

September 6, 2024

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: Matter of a Commission Investigation into Gas Utility Resource Planning, Docket No. G008,G002,G011/CI-23-117 and G999/CI-21-565

Dear Mr. Seuffert,

We appreciate the opportunity to comment on the resource planning requirements for Minnesota's three largest gas utilities. This letter represents the views of seven local government agencies within Xcel Energy or CenterPoint Energy's natural gas service territory.

The integration of local climate goals will result in successful and equitable planning for the future of natural gas in our communities. Many local governments lack the capacity and expertise to engage in regulatory proceedings. These decisions have long-term implications for our residents, businesses, organizations, and municipal operations—intentional engagement by utilities with government agencies is necessary to have these local voices heard.

The undersigned government agencies propose a new decision option as an alternative to decision options 6, 7, 8, 37, 38, 98 and 99 as outlined in the Staff Briefing Papers filed August 29, 2024, Document ID 20248-209872-01.

New local government decision option:

Natural gas utilities shall work with local government agencies to:

1. Consider local climate goals in resource plans and provide a narrative discussion of how resource plans impact those goals.
2. Collaborate with local governments with adopted climate goals to prioritize greenhouse gas reduction investments and pilots when possible.
3. Actively include local government representatives in resource planning stakeholder engagement to discuss community-specific concerns. Gas utilities will provide a narrative description of its government engagement activities and a summary of how input is or is not incorporated into final decisions.
4. Align gas infrastructure projects with approved community capital improvement plans. Plans will include a narrative description of how utilities will coordinate with government representatives.

We appreciate your consideration of this recommendation.

/s/ Marisa Bayer
Sustainability Manager
City of Edina

/s/ Jennifer Fierce
Sustainability Coordinator
City of Eden Prairie

/s/ Mikala Larson
Sustainability Coordinator
City of Hopkins

/s/ Patrick Hanlon
Deputy Commissioner
Sustainability, Healthy Homes,
and Environment
Health Department
City of Minneapolis

/s/ Rachel Lindholm
Sustainability Coordinator
City of Richfield

/s/ Russ Stark
Chief Resilience Officer
City of Saint Paul

/s/ Emily Ziring, CEM
Sustainability Manager
City of St. Louis Park