



414 Nicollet Mall  
Minneapolis, MN 55401

January 13, 2025

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

—Via Electronic Filing—

RE: REPLY COMMENTS  
2025 GAS UTILITY INFRASTRUCTURE COST RIDER  
DOCKET NO. G002/M-24-369

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission (Commission) this Reply to the January 2, 2025 Comments of the Department of Commerce, Division of Energy Resources (Department) regarding our 2025 Gas Utility Infrastructure Cost (GUIC) Rider Petition filed October 31, 2024 in the above-noted docket.

We appreciate the Department's review of our 2025 GUIC Rider Petition and their recommendation that the Commission approve our proposal. We agree with the Department's recommendation that we provide a compliance filing in the present docket, based on Commission decisions, within 10 days of Commission Order, including electronic files with formulae intact of the revenue requirement and corresponding rate factor schedules. We also commit to submitting a compliance filing upon the implementation of final rates in Docket No. G002/GR-23-413<sup>1</sup> detailing the impacts on the Company's GUIC Rider for GUIC projects rolled into base rates and updating the revenue apportionment allocators, prior to implementation of the 2025 GUIC Rider factors on March 1, 2026.

The Department noted that in previous years the Company provided the bill impact for three factors, but in this docket the Company only provided the impact of the current factors (2023) and the impact of the proposed factors (2025). They also noted that they were unable to verify the Company's impact of the current factors. In our Petition, we had inadvertently calculated the current year impacts using a blended

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<sup>1</sup> *In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Natural Gas Service in Minnesota*, Docket No. G002/GR-23-413.

GUIC factor average from 2022 and 2023 instead of the 2023 GUIC factor. We apologize for any confusion caused. Please see the table below for a revised version of Petition Table 11, including the impact for the factors for 2023, 2024, and 2025. Our calculations are consistent with the Department's estimated bill impacts in Table 9 of their January 2, 2025 Comments.

### Monthly Residential Bill Impacts

	Impact of Current Factors <sup>2</sup>	Impact of 2024 Approved Factors <sup>3</sup>	Impact of 2025 Proposed Factors
Monthly Bill Impact	\$2.88	\$1.99	\$3.21
Incremental Bill Impact Change as % of Total Bill		-31.06%	61.93%

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. If you have any questions regarding this filing, please contact Brandon Kirschner at [brandon.m.kirschner@xcelenergy.com](mailto:brandon.m.kirschner@xcelenergy.com).

SINCERELY,

/s/

LISA R. PETERSON  
DIRECTOR, REGULATORY PRICING & ANALYSIS

Encl  
c: Service List

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<sup>2</sup> Factors approved in Docket No. G002/M-22-578

<sup>3</sup> Factors approved in Docket No. G002/M-23-457

## **CERTIFICATE OF SERVICE**

I, Joshua DePauw, hereby certify that I have this day served copies or summaries of the foregoing documents on the attached list(s) of persons.

xx by depositing a true and correct copy thereof, properly enveloped  
with postage paid in the United States Mail at Minneapolis, Minnesota

or

xx electronic filing

**Docket No. G002/M-24-369**

Dated this 13th day of January 2025

/s/

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Joshua DePauw  
Regulatory Administrator

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		Yes	24-369M-24-369
2	Katherine	Arnold	katherine.arnold@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	24-369M-24-369
3	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		No	24-369M-24-369
4	Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	24-369M-24-369
5	Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	24-369M-24-369
6	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-369M-24-369
7	Robert S.	Carney, Jr.				4232 Colfax Ave. S. Minneapolis MN, 55409 United States	Paper Service		No	24-369M-24-369
8	Olivia	Carroll	oliviac@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St W1360 St. Paul MN, 55101 United States	Electronic Service		No	24-369M-24-369
9	Joey	Cherney	joey.cherney@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota Street STE 1800 Saint Paul MN, 55101 United States	Electronic Service		No	24-369M-24-369
10	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	24-369M-24-369
11	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	24-369M-24-369
12	Riley	Conlin	riley.conlin@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall, 401 8th Floor Minneapolis MN, 55401 United States	Electronic Service		No	24-369M-24-369
13	Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of		332 Minnesota St	Electronic Service		No	24-369M-24-369





#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
37	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	24-369M-24-369
38	Kimberly	Middendorf	kimberly.middendorf@state.mn.us		Office of Administrative Hearings	PO Box 64620 600 Robert St N Saint Paul MN, 55164-0620 United States	Electronic Service		No	24-369M-24-369
39	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	24-369M-24-369
40	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-369M-24-369
41	Travis	Murray	travis.murray@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Ste 1400 Saint Paul MN, 55101 United States	Electronic Service		No	24-369M-24-369
42	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24-369M-24-369
43	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	24-369M-24-369
44	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	24-369M-24-369
45	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	24-369M-24-369
46	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	24-369M-24-369
47	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	24-369M-24-369
48	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	24-369M-24-369
49	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential	Suite 1400 445 Minnesota Street	Electronic Service		No	24-369M-24-369

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
					Utilities Division	St. Paul MN, 55101-2131 United States				
50	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States	Electronic Service		Yes	24-369M-24-369
51	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	24-369M-24-369
52	Janet	Shaddix Eling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	24-369M-24-369
53	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	24-369M-24-369
54	Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine		225 S 6th St Ste 3500 Capella Tower Minneapolis MN, 55402-4629 United States	Electronic Service		No	24-369M-24-369
55	Suzanne	Todnem	suzanne.todnem@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		Yes	24-369M-24-369
56	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	24-369M-24-369
57	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	24-369M-24-369