

October 14, 2022

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket Nos. G999/M-21-135, G008/M-21-138, G004/M-21-235, G002/CI-21-610, and G011/CI-21-611

Dear Mr. Seuffert:

Attached are the Comments of the Minnesota Department of Commerce, Division of Energy Resources in the following matter:

*In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers*

The attached Comments include analysis and recommendations both from Department analysts and the Department's consultant in this proceeding, GDS Associates, Inc.

Sincerely,

/s/ NANCY CAMPBELL

/s/ STEPHEN RAKOW  
Public Utilities Analyst Coordinators

NC/SR/ja  
Attachment



## Before the Minnesota Public Utilities Commission

---

### Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. G999/M-21-135, et al.

#### I. INTRODUCTION

The extreme arctic weather event that occurred in February 2021 (Feb-21 Event) had a profound economic impact on Minnesota gas ratepayers. CenterPoint Energy Minnesota Gas (CNP), Xcel Energy (Xcel), Minnesota Energy Resources Corporation (MERC), and Great Plains Natural Gas Co. (Great Plains) (collectively the Gas Utilities) maintained reliable service to customers but at an extreme cost. The Minnesota Department of Commerce (the Department) extensively participated in the Minnesota Public Utilities Commission (Commission) investigative docket into the event and the prudence of the actions taken by the Gas Utilities to reasonably limit extraordinary costs. A prudence investigation requires a backward-looking assessment of reasonable action based on knowledge available at the time. With that review complete, the Commission has pivoted to a forward-looking investigation of how the Gas Utilities can modify their practices to mitigate the negative outcomes of a similar event in the future.

The most recent EIA winter outlook predicts higher prices, more volatility, and low inventory<sup>1</sup>. The Department appreciates the Commission pursuing a forward looking proceeding to mitigate the impacts of these high prices and keep heating bills affordable for Minnesota ratepayers.

The Department is providing comments related to all the topics raised by the Commission in the following sections which are structured in alignment with the Commission's list of topics. The Department's comments are based on its extensive participation and review of the Feb-21 Event as well as the Gas Utilities' comments that were filed on September 15, 2022. The next section provides comments on the list of gas supply and planning topics for each of the Gas Utilities which includes contracting, purchasing, hedging, storage, interruptible customers, peak-shaving, and customer communications. The subsequent sections separately discuss the other items in the Commission's order, namely integrated resource planning, Performance-Based Gas Purchasing Plans, and the Natural Gas Innovation Act.

---

<sup>1</sup> U.S. Energy Information Administration (EIA) Winter Fuels Outlook, accessed October 13, 2022 at [https://www.eia.gov/outlooks/steo/special/winter/2022\\_Winter\\_Fuels.pdf](https://www.eia.gov/outlooks/steo/special/winter/2022_Winter_Fuels.pdf).

## **II. GAS SUPPLY AND PLANNING**

The Commission provided an apt list of gas supply and planning topics that are material to risk mitigation of a spike in daily spot prices of natural gas. As noted, the Department's comments are based on its extensive review of the Feb-21 Event and the Gas Utilities' comments on these topics filed on September 15, 2022.

### **A. GAS SUPPLY CONTRACTING**

In their comments, the Gas Utilities explain that they generally contract for natural gas supply pursuant to industry-standard contracts that are generally defined by the North American Energy Standards Board (NAESB). The Gas Utilities contend that they have been unsuccessful in altering their gas supply contracts or acquiring new contracts that would reasonably protect against a spot price spike. The Department appreciates that the Gas Utilities are actors in a broader market without unilateral control over all its aspects. Furthermore, spot price spikes reflect a risk that is inherently challenging to mitigate perfectly. The Department recommends that the Gas Utilities should continue to pursue and explore non-standard contracting options that could provide greater protection against daily price spikes. To the extent those options come at a cost premium (as they likely would), the benefit of reduced risk or greater price certainty must exceed the associated cost premium.

As noted by the Gas Utilities, NAESB has recently convened a Gas / Electric Harmonization Forum that is meeting to discuss reforms to both the gas and electric industries. The Department recommends the Gas Utilities participate in this and other relevant efforts to track and pursue reforms that would be beneficial to their customers. One possible reform item would be improvements to the force majeure language in the standard NAESB contract. Although gas supply cuts or failures were not a major issue for the Gas Utilities in the Feb-21 Event, they represent a supply uncertainty and risk going forward. A beneficial improvement would be improving the force majeure language to provide greater supply commitment and certainty during extreme cold events.

### **B. GAS PURCHASING**

There are multiple sub-topics within gas purchasing that merit discussion. Baseload purchases, diversity of supply, and supply reserve margin are discussed separately below.

#### **1. Baseload Purchases**

Each of the Gas Utilities described purchasing a greater portion of its overall supply needs with baseload. The Department supports this practice and, in the prudence review, had noted that greater levels of baseload were possible for each Gas Utility. Higher volume baseload purchases directly offset the required volume of spot or daily purchases, which represent the portion of gas supply exposed to the risk of a short-term price spike. Baseload can be purchased at a monthly index (FOM) or at an

otherwise agreed upon fixed price. Going into a month, the Gas Utilities cannot be certain whether the baseload price will result in higher or lower than the average price of spot or daily gas for that month. However, the potential premium comes with the benefit of assurance that the Gas Utility avoids excessive costs associated with a price spike on the additional volume supplied via baseload.

As discussed at length in the prudence investigation, the Gas Utilities cannot meet an unlimited portion of their needs with baseload gas. There are operational limits to how much gas the Gas Utilities can take each day and complete reliance on a single form of supply would not be reasonable. However, the prudence review revealed that the Gas Utilities were generally purchasing baseload to meet their expected monthly minimum load. The Gas Utilities can manage a baseload supply that exceeds load requirements on a small number of days in a month by injecting into storage, selling back to the market, or otherwise utilizing flexibility that their pipeline contracts afford on warmer days. The Department supports the Gas Utilities incorporating a greater degree of baseload purchases to mitigate spot price spike exposure.

## *2. Xcel Baseload Procurement and Forecasting*

Whereas CNP, MERC, and GP described definite plans or actions to incorporate greater amounts of baseload purchases, Xcel's description of its plans is vague. Xcel states that it purchases most of its winter baseload over the summer but did not describe what those efforts have amounted to in increased baseload for the upcoming winter (2022-2023). Xcel stated it anticipated buying the same level of baseload as it did for last winter (2021-2022) which was approximately 12% more than in the winter of 2020-21, during which the Feb-21 Event occurred. In the prudence review, the Department had serious concerns with Xcel's forecasting of its minimum load and its level of baseload procurement. Xcel's lack of a commitment to procuring additional baseload and its description of numerous obstacles that may limit it from doing so are concerning, especially in light of the other Gas Utilities ability to make such commitments. In the prudence review, the Department recommended a disallowance based on Xcel under-procuring baseload for February 2021 by 12.6%. This recommendation was conservatively premised on Xcel's actual procurement level which was beneath its forecasted minimum load for the month. Xcel's minimum load forecasted also appeared biased too low. On a prospective basis with the Feb-21 Event in the record, it remains unclear if Xcel is procuring a reasonable amount of baseload. It similarly remains unclear if Xcel is reasonably forecasting minimum load, which is an important factor in procuring baseload.

## *3. Supply Diversity*

During the Feb-21 Event, prices spiked to various degrees across the pricing hubs relevant to the Minnesota Gas Utilities. Most notably, Canadian gas supply priced at the Emerson hub was much less expensive than supply priced at the more southern hubs of Ventura and Demarc. Consistent with its position in the prudence review, the Department understands that supply diversity is connected to long-term pipeline capacity positions. Nevertheless, there broadly exists some capability for the Gas

Utilities to adjust their supply diversity given their existing pipeline capacity, and the Department supports the Gas Utilities doing so. For example, CNP explains that it is exploring changes to pricing locations for existing contracts and is blending baseload and daily purchases between locations. Over the longer term (i.e., after the upcoming heating season as part of the Gas Utilities' regular, ongoing capacity planning), the Department recommends the Gas Utilities include supply diversity as one of many considerations taken when reviewing, modifying, or expanding their pipeline capacity. As a part of their Contract Demand Entitlement filings, the Department recommends the Gas Utilities discuss how changes to their pipeline capacity affect their supply diversity. If pipeline capacity comes at a cost premium but increases supply diversity, the Gas Utilities should provide a meaningful cost / benefit discussion of the tradeoff including a comparison with the least-cost capacity option.

#### *4. Supply Reserve Margin*

Despite being a significant topic in the prudence review, none of the Gas Utilities discussed their practices related to their supply reserve margins. A supply reserve margin reflects the practice of intentionally acquiring gas supply at a level slightly higher than forecasted load requirements for a particular day. A supply reserve margin is utilized to manage the risk, and avoid the associated costs, of inadequate supply caused by forecast uncertainty and supply failures. Although the Department recognizes the general practice of carrying a supply reserve margin, the Department disagrees with the Gas Utilities' position that a supply reserve margin defied after-the-fact explanation or quantification and that a reasonable supply reserve margin could be as large as 30%.

The Department does not seek to require a prescriptive supply reserve margin position on the Gas Utilities. Nevertheless, the Gas Utilities' practices related to a supply reserve margin are directly relevant to spot price spike exposure. A supply reserve margin inherently imposes incremental supply requirements on top of load requirements. On the margin and especially on very cold days, this supply requirement is procured at daily spot prices. Procuring 10% to 30% supply reserve margins when such quantities cannot be justified or explained should not be an acceptable practice. The Department recommends the Gas Utilities commit to improving their supply reserve margin practices to minimize these quantities to the greatest extent possible and be prepared to explain the level of their supply reserve margins in the future.

#### *C. Hedging*

In their comments, the Gas Utilities describe their hedging programs, which involve acquiring hedges such that a defined level of price certainty is achieved for the upcoming winter. The Gas Utilities' hedging programs and underlying financial hedges are designed to provide price protection against consistent upward movement in market prices. Indeed, the hedges that the Gas Utilities acquired in prior years should provide protection and benefit in light of the marked increase in the gas market over the past roughly two years. However, these hedges are not designed to protect against a transient price spike and did not shield customers during the Feb-21 Event. The Department understands that

hedges that would be effective for spot price spikes have been generally unavailable or prohibitively expensive but supports the Gas Utilities continuing to explore for future opportunities.

The Gas Utilities' hedging programs should continue to be evaluated in their existing, ongoing processes. The Feb-21 Event highlighted that a defined level of price certainty over an entire season does not translate to the same degree of price certainty on a particular peak day. As a continued reflection of this dynamic, the Department recommends the Gas Utilities expand their relevant annual, forward-looking gas planning or hedging filings to illustrate their expected supply mix across different load and weather conditions throughout the winter. Specifically, the Gas Utilities should provide, for each month of the upcoming winter season, the forecasted minimum, average, and maximum day load requirements and the expected mix of baseload, storage, and spot supply on those days. This information will complement the Gas Utilities overall hedging percentage targets with the exposure to spot prices on a daily basis throughout the winter months.

#### *D. STORAGE*

The Department understands that additional storage is not readily available for the Gas Utilities because existing storage in the region is fully subscribed. While additional storage could provide a greater ability to mitigate winter spot price spike exposure, it also represents a significant long-term, fixed expense that must be borne by customers. Adding significant storage capacity would be a major decision that would need to be fully evaluated under the Commission's existing processes. Mitigation of spot price spikes is only one benefit of storage additions, and as such, should not be considered in isolation during these decisions. Other factors, including other associated benefits in combination with spot price mitigation and the operational needs of the Gas Utilities would need to justify the fixed cost investment.

Given the difficulty and expense of acquiring additional storage, the Department's focus is on the Gas Utilities maximizing the use of their existing storage. An important lesson from the Feb-21 Event is that the Gas Utilities (and potentially the broader market) are more exposed to a spot price spike because storage capability has eroded by the later winter. Generally speaking, storage is most effective when inventory levels are full going into the winter. As storage inventories are withdrawn, the maximum daily usage of storage ratchets down. In the winter of 2020-21, the Gas Utilities' storage withdrawal limits were reduced by the time of the Feb-21 Event. Late February appears to be particularly problematic because the potential for extreme cold weather is still relatively high. In its comments, Great Plains provided discussion of changes to its storage withdrawals throughout the winter to maintain greater withdrawal capability for the later part of the season. The Department understands that storage is an operational tool and that storage contracts have certain requirements that storage inventories be drawn down by the end of the winter. Given those factors, the Department recommends the other Gas Utilities explain if there are modifications to storage inventory management that could preserve withdrawal capabilities for the later winter and the ramifications of such a strategy.

1. *CNP Waterville Storage*

CNP proposes to incorporate an additional 10% of storage withdrawals from Waterville into its daily purchasing plans. The Department supports this general approach which is in concert with its conclusions from the prudence review. There the Department's review showed that CNP frequently withdrew above the 50,000 Dth/day notional maximum limit from Waterville. CNP should utilize its discretion in planning for quantities above Waterville's maximum limit when it believes it will be able to achieve those withdrawals. Further, CNP proposes to take these steps with Waterville according to the economic trigger (discussed below). The discussion below is pertinent to the limited nature of this approach. In line with the above general discussion on acquisition of additional storage, the Department supports CNP exploring the acquisition of additional deliverability for Waterville and potential expansion.

E. *INTERRUPTIBLE CUSTOMERS*

For both the peak shaving facilities and interruptible customers, the Gas Utilities have jointly proposed an economic trigger which is discussed next before other interruptible customer issues.

1. *Economic Trigger*

As the Gas Utilities correctly describe, their proposed economic trigger is only useful in avoiding impacts for price spikes that extend to a second natural gas trading day. The proposed economic trigger amounts to waiting for a price spike to occur and then reacting based on the assumption the price spike will continue for subsequent days. Utilizing curtailments and peak shaving in a purely reactive fashion following the occurrence of a price spike severely limits the usefulness of their mitigation potential.

To be clear, if a price spike does persist for more than one trading day, then a reactive action is warranted and necessary. This view was the basis of the Department's recommendations that the Gas Utilities should have done more during the Feb-21 Event, specifically during trading on February 16, 2021 for the following gas day after the full magnitude of the price spike that began with trading on February 12, 2021 was clear. The Feb-21 Event also illustrates that the majority of the economic impact was incurred based on purchases made on the first trading day of the Feb-21 Event. Although that price spike was unprecedented, its occurrence means the Gas Utilities should be on alert for another large price spike in the future.

There are other lessons from the Feb-21 Event that are germane to the economic trigger. As touched on above, a late winter Event holds particular risk because of a likelihood that in February, the Gas Utilities load and purchasing requirements are still relatively high, but storage withdrawal capabilities are also likely to have already been reduced. More significantly, the structure of the natural gas supply market imposes increased risk and volatility for weekends and holiday weekends. The economic harm

from the Feb-21 Event was multiplied because it occurred over President's Day weekend. Correspondingly, the economic harm that the Gas Utilities had the potential to avoid was also multiplied. That is, any peak shaving, curtailment, or other efforts taken by the Gas Utilities to mitigate that, or any future weekend or holiday weekend price spike, only requires action to be focused on the peak load day to then reduce ratable purchases by an equivalent volume for each day over the course of the entire weekend.

The Department understands that a spot price spike cannot be perfectly forecasted in advance and is not guaranteed to have occurred until after the Gas Utilities' purchases have already been made. However, the Gas Utilities are regular and sophisticated actors in the market and are well suited to gauge the risk and volatility in the market that would lead to a high likelihood of a price spike occurring. The Gas Utilities are expected to use their market knowledge to anticipate the risk of a price spike and respond proactively when the market is highly volatile. As a part of this proactive behavior, the Gas Utilities should use lessons learned from the Feb-21 Event including the risk of weekends, extreme cold weather in the late winter, and extreme cold weather that covers a large portion and / or southern portion of the country.

The Department notes that a simple, robotic economic trigger that would provide better protection and benefit for ratepayers. However, the inherent nature of a price spike does not lend itself to a prescriptive trigger. A price spike is sudden and transient. If a price spike is expected to extend beyond a single trading day, then the Gas Utilities trigger can be used as a guide for mitigating economic harm. However, the Gas Utilities should not reflexively react to a price spike if it has clearly passed and will not continue. A price spike may very well only persist for a single trading day, or the first trading day may dominate the economic consequences as was the case with the Feb-21 Event. Accordingly, the Gas Utilities need to proactively trigger economic action with the understanding that there is a reasonable probability of a price spike but one is not guaranteed to occur. Neither the Department nor the Commission can prescribe the details of the Gas Utilities' day-to-day operations. Rather, the Gas Utilities maintain the burden to act prudently such that customers only pay for reasonably incurred costs. The proposed economic trigger should not be justification for the Gas Utilities failing to take other reasonable actions to protect customers in future events.

## *2. Other Interruptible Customer Issues*

The Department supports the Gas Utilities pursuing strategic curtailment to mitigate spot price risk. Xcel, MERC, and GP's comments each suggest that they intend to curtail all of their interruptible customers for economic purposes. In contrast, CNP identified specific classes of customers that it would curtail for economic purposes. In the near term, the Department supports the concept of focusing (to the extent possible) economic curtailments on the interruptible customer classes that are the best candidates for economic curtailments. This approach is in concert with the Department's recommendation from the prudence review which was based on a partial curtailment targeted at the customers the Gas Utilities had the most comfort and experience with curtailing. This approach has the



benefit of lessening the impact of economic curtailments on interruptible customers while also allowing the Gas Utilities to retain a portion of their curtailment to manage unforeseen circumstances.

In the longer term, the Department recommends that the Gas Utilities explore the development of new interruptible service offerings that are designed to allow for a reasonable degree of economic curtailments by the Gas Utilities. It is reasonable for the Gas Utilities to utilize their existing offerings for economic purposes this winter, but it may be beneficial to design new offerings based on the Gas Utilities' experience with economic curtailments or the greater flexibility those might provide. Certain customers may prefer to pay more for service that is interrupted less and only for reliability purposes (but still not firm service), but other customers may be interested in paying less for service that is flexible for further interruptions for economic purposes as well.

#### *F. PEAK SHAVING*

Similar to storage, new or expanded peak shaving facilities would represent a significant decision with capital investment requirements. Any such pursuit should be fully vetted under the Commission's existing processes and reduction of price spike risk would only be one benefit that would need to be stacked with others to justify a project. CNP and Xcel both have existing peak shaving facilities, so the maximization of those assets is the Department's focus.

The Gas Utilities are proposing to apply the same economic trigger to economic curtailment of interruptible customers and peak shaving. Thus, the discussion in the previous section related to the economic trigger is equally applicable to peak shaving.

Both CNP and Xcel propose to limit economic dispatch of their peak shaving facilities to their Liquefied Natural Gas (LNG) facilities and not their propane facilities. This is in alignment with the Department's recommendations from the prudence review, and the Department agrees. The LNG facilities are better situated to be used economically due to their greater flexibility and fuel inventory.

CNP states that it is pursuing winter liquefaction at its LNG plant. The upside of this capability would be that the LNG plant could be refilled during the winter in off peak times. The result would be greater flexibility and aggressiveness for economic dispatching based on an ability to refill fuel during the winter. In contrast to this investigation, Xcel states it is unable to refill its LNG plant during the heating season. There is potential value in winter liquefaction that should be explored by both CNP and Xcel.

##### *1. CNP*

CNP proposes to begin economic dispatch of its peak shaving facilities for the upcoming winter with certain limitations. Specifically, it proposes to limit dispatch 25% of the daily capability of its LNG plant and only do so after January 20. CNP does not justify either of these strict, bright-line limitations and also discusses relevant factors that make them inappropriate. For example, in the Feb-21 Event, CNP

found itself in mid-February without having dispatched its peak shaving facilities. The relative lateness in the winter and effectively full fuel inventory meant that CNP could be assured its LNG plant would have fuel in the unlikely event of an even later winter Design Day. If CNP were to find itself in similar circumstances this winter, it should not rigidly impose a 25% LNG limit. Generally, CNP should use the circumstances of the event, the prevailing winter, and the status of its fuel inventory to inform its dispatch decision. In an attachment, CNP describes that it is evaluating development of a probabilistic model to weigh the tradeoff of LNG fuel inventory versus the probability of subsequent Design Day events. The Department agrees that the correct analysis is to weigh the remaining inventory of LNG fuel versus the probability for subsequent Design Day conditions that would require LNG dispatch for reliability. LNG fuel needs to be available for use on Design Day conditions if those manifest. If a fully developed model cannot be developed prior to this winter, the basic tradeoff can still be evaluated and acted upon.

## *2. Xcel*

Xcel proposes to use potentially the entire capability of its LNG facility for economic dispatch but not until the winter of 2023-24. Xcel states that it has been limited on filling its LNG facility over the summer, implying that its inventory level will be too limited to allow for economic dispatch this winter. Based on Xcel's description, it is unclear what the fuel inventory position of the LNG plant will be or the specific circumstances surrounding any fuel inventory limitations. Besides the lack of clarity pertaining to why Xcel cannot begin economic dispatch this winter, the same tradeoff of fuel inventory versus the probability of future Design Day events applies for Xcel as it does for CNP. If Xcel finds itself in the late winter with significant unused LNG fuel and the prospect of price spike, economic dispatch is likely warranted.

## *G. CUSTOMER COMMUNICATIONS*

The Gas Utilities present a range of limited to no changes with respect to customer communications. CNP and MERC describe their ongoing, regular customer communication campaigns but states it will not explore economic conservation requests further. They argue that such requests should be reserved for emergency situations. Xcel explains that it will make economic conservation requests in accordance with its November 1, 2021 filing whenever the economic trigger (discussed above in Section II.E.1) is reached. GP states that it may make economic conservation requests of its customers. All of the Gas Utilities explain that the response of an economic conservation request would be difficult to gauge in advance in order to avoid purchasing spot gas. Nevertheless, the Department agrees with Xcel's approach of engaging in economic conservation requests in anticipation of extreme spot price spikes and studying customer responses. If such requests manifest, then the Gas Utilities can learn to anticipate customer's responses and potentially translate that anticipation into avoided spot gas purchases.

### **III. INTEGRATED RESOURCE PLANNING; STATUTORY OR RULE CHANGES TO PROTECT FUTURE PRICE SPIKES**

#### **A. GAS INTEGRATED RESOURCE PLANNING (IRP)**

Each utility in their September 15 filing commented on the idea of Gas IRP. Since each utility made similar arguments, the Department focuses on CNP's comments and provides a response. CNP states that IRP is:

a planning strategy and process that evaluates and compares resources and infrastructure that can be used to meet natural gas system needs over a defined period into the future.<sup>2</sup>

The Department agrees with this characterization.

CNP also notes that the idea of a Gas IRP operates similarly to other existing processes:

"In many ways, the Company's annual Gas Procurement Plan operates similarly to an IRP in that it shows the Company's estimated load forecast, and the capacity and supply resources that will be used to meet that need for the upcoming heating season."

In addition, CNP stated that:

"the Commission also regulates the Company's:

- procurement of transportation capacity and storage in demand entitlement proceed
- procurement of commodity in monthly purchase gas adjustment and annual automatic adjustment proceedings;
- capital investments for integrity, public improvement, and new growth in rate recovery proceedings, new area surcharge and natural gas extension project and certificate of need proceedings; and
- service quality in annual quality of service reports"<sup>3</sup>

---

<sup>2</sup> CenterPoint September 15 comments at 22.

<sup>3</sup> CenterPoint comments at 22-23.

CenterPoint further observes that very few jurisdictions use IRP for natural gas utilities. The Department agrees that a Gas IRP would largely duplicate other existing dockets.

Finally, CNP notes the differences in the gas and electric industries:

“Significant differences between the gas and electric utility industries limit the applicability of the well-developed electric utility IRP process to natural gas utility planning. These differences include lack of vertical integration, shorter planning horizons, and a focus on supply procurement and distribution system expansion rather than generation capacity expansion.”<sup>4</sup>

Significantly, CenterPoint also points out that the main purpose of an IRP is not to prevent price spikes but to evaluate customer needs and alternatives over a longer planning horizon under a range of circumstances.

The Department agrees with CNP’s description of the differences in the industries, and recommends that the Commission not pursue the concept of a Gas IRP as a tool to prevent against future price spikes.

#### ***B. STATUTORY OR RULE CHANGES TO PREVENT FUTURE PRICE SPIKES***

The Gas Utilities jointly noted that they supported legislation adopting a sales tax exemption for the February Market Event for residential heating customers, but it did not pass in the 2022 Legislative Session.

The Gas Utilities also stated that they reviewed existing statutes and rules, focusing especially on the AAA and PGA rules, but do not recommend any changes.

The Department does not have any recommendations independent of the Gas Utilities at this time.

#### **IV. PERFORMANCE BASED GAS PURCHASING PLAN, MINN. STAT. §216B.167**

Each of the utilities commented on the possibility of filing a plan pursuant to this statute. The Department will not repeat each of the utilities’ comments here, but notes that the utilities generally did not see many opportunities to pursue plans under this statute given the dynamics of today’s natural gas industry. CNP, for example, observes that there would be “challenge[s]” with gas purchasing incentive mechanisms given the nature of most natural gas commodity purchases, and

---

<sup>4</sup> CenterPoint comments at 23.

further explains that the jurisdictions that implemented pilot programs ultimately returned to pass-through cost recovery mechanisms.<sup>5</sup>

The Department generally agrees with the utilities that because the statute was passed in the 1990s, the statute may not reflect the current nature of the natural gas industry. How the statute is structured and its goals may need a refreshed look. However, if the Commission believes there is an opportunity to structure an incentive plan under this statute, the Department will participate in any proceeding initiated by the Commission.

#### **V. NATURAL GAS INNOVATION ACT (MINN. STAT. §§216B.2427 AND 216B.2428)**

The Commission's August 23, 2022 notice required each impacted gas utility to review its gas contracting, purchasing, hedging, storage, peak-shaving, interruptible, customer communications, and other relevant practices to improve or modify its practices to protect ratepayers from extraordinary natural gas price spikes in the future. The scope of this docket and utilities' comments filed September 15 have focused on practices related to the acquisition and use of fuel resources to mitigate extreme changes in fuel resource prices.

Innovation plans under NGIA and examination of regulatory changes under the Future of Gas docket focus on GHG emission reductions in the natural gas utility sector. Specifically, innovation plans center around development and deployment of alternative fuel resources to displace conventional natural gas. To the extent that the fuel resource practices highlighted in 21-135 impact efforts to displace conventional natural gas via utility innovation plans, or vice versa, some overlap between the two dockets might exist. For example, on page 22 of its Sept 15 comments CenterPoint hypothesized a scenario where renewable natural gas developed under an innovation plan might be stored to supplement supplies during a pricing event. While 21-135 and innovation plans focus on fuel resources, the scope of the Future of Gas docket contemplates any regulatory and policy changes that could further gas utility participation in reducing GHG emissions, including policies and practices related to infrastructure, cost recovery, fuel resources, and more. The Commission's August 23, 2022 notice mentioned gas integrated resource planning as a means of protecting customers from future price spikes, and some utilities proposed discussing this policy in the Future of Gas docket. Conceptually, the Future of Gas proceeding would be an appropriate venue to discuss the pros and cons of gas integrated resource plans.

Provided that actions taken in 21-135 do not limit the type of fuel resource that can be deployed under the utility practices highlighted in the Commission's August 23, 2022 notice, for example by requiring that it be conventional natural gas, the Department sees little risk in limiting innovation plans under NGIA or the Future of Gas docket through actions taken in 21-135. In fact, actions taken in 21-135

---

<sup>5</sup> CenterPoint September 15, 2022 filing at 9-10.

could further development of ideas explored in the Future of Gas docket focused on reducing GHG emissions. For example, transitioning utility practices to incorporate economic thresholds in addition to reliability thresholds could create space for further consideration of the cost of GHG emissions in utility practices.

## **VI. RECOMMENDATIONS**

The Department thanks the Commission for the opportunity to comment on these important issues, and makes the following summary recommendations based on its analysis:

1. *Overall: When ordering any specific action from the Gas Utilities' to better mitigate price spikes, the Department recommends that the Commission emphasize that such action does not relieve the Gas Utilities from demonstrating prudence. Prudence reviews remain a key tool in ensuring that the Gas Utilities are providing safe, reliable, and affordable service. While any changes ordered as a result of this docket may be relevant to a prudence determination, the Gas Utilities will continue to have the burden of establishing their actions were prudent to recover gas cost.*
2. *Gas Contracting: The Department recommends the Gas Utilities participate in NAESB's Gas/Electric Harmonization Forum and other relevant efforts to track and pursue beneficial reforms, such as improving the force majeure language in the NAESB standard contract. The Department also recommends the Gas Utilities continue to explore the availability and cost of contracting, hedging, and supply options that would provide better protection against price spikes.*
3. *Gas Purchasing:*
  - a. *Baseload purchases: The Department supports CNP's, MERC's, and GP's plans to incorporate a greater degree of baseload purchases to mitigate spot price spike exposure. The Department recommends that Xcel propose a plan to incorporate a greater degree of baseload purchases similar those proposed by the other Gas Utilities.*
  - b. *Supply Diversity: As a part of their Contract Demand Entitlement filings, the Gas Utilities should discuss how changes to their pipeline capacity affect their supply diversity. If pipeline capacity comes at a cost premium but increases supply diversity, the Gas Utilities should provide a meaningful cost / benefit discussion of the tradeoff including a comparison with the least-cost capacity option.*
  - c. *Supply Reserve Margin: The Gas Utilities should commit to improving their supply reserve margin practices to minimize these quantities to the greatest extent possible and be prepared to explain the level of their supply reserve margins in the future.*
4. *Hedging: The Department recommends that the Gas Utilities' relevant annual, forward-looking gas planning or hedging filings be expanded to better illustrate their expected supply mix across different load and weather conditions throughout the winter. Specifically, to complement their overall hedging percentage targets, the Gas Utilities should provide, for*

*each month of the upcoming winter season, the forecasted minimum, average, and maximum day load requirements and the expected mix of baseload, storage, and spot supply on those days.*

5. *Economic Trigger: The inherent nature of a price spike does not lend itself to a prescriptive trigger. The Gas Utilities need to proactively trigger economic action with the understanding that there is a reasonable probability of a price spike but one is not guaranteed to occur. Neither the Department nor the Commission can prescribe the details of the Gas Utilities' day-to-day operations. Rather, the Gas Utilities maintain the burden to act prudently such that customers only pay for reasonably incurred costs. The proposed economic trigger should not be justification for the Gas Utilities failing to take other reasonable actions to protect customers in future events.*
6. *Storage:*
  - a. *All Gas Utilities: Any pursuit of new or expanded peak shaving facilities should be fully vetted under the Commission's existing processes and reduction of price spike risk would only be one benefit that would need to be stacked with others to justify a project.*
  - b. *CNP, MERC, and Xcel: Great Plains discussed changes to its storage withdrawals throughout the winter to maintain greater withdrawal capability for the later part of the season. CNP, MERC, and Xcel should similarly propose potential modifications to storage inventory management that could preserve withdrawal capabilities for the later winter.*
  - c. *CNP: The Department supports CNP's general proposal to incorporate an additional 10% of storage withdrawals from Waterville into its daily purchasing plans when it believes that additional withdrawal will be available but notes that the use of the economic trigger is limited in nature. The Department supports CNP exploring the acquisition of additional deliverability for Waterville and potential expansion.*
7. *Interruptible Customers: For the upcoming heating season, the Department supports the concept of focusing (to the extent possible) economic curtailments on the interruptible customer classes that are the best candidates for economic curtailments, as described by CNP. For future heating seasons, the Gas Utilities should explore the development of new interruptible service offerings that are designed to allow for a reasonable degree of economic curtailments by the Gas Utilities.*
8. *Peak Shaving:*
  - a. *All Gas Utilities: Any pursuit of new or expanded peak shaving facilities should be fully vetted under the Commission's existing processes and reduction of price spike risk would only be one benefit that would need to be stacked with others to justify a project.*
  - b. *CNP: The Department does not believe that CNP has justified its strict limits of economic peak shaving dispatch to after January 20 and only 25% of daily capability of its LNG plant. Generally, CNP should use the circumstances of the event, the prevailing winter, and the status of its fuel inventory to inform its dispatch decision.*

*The Department supports CNP's development of a probabilistic model to weigh the tradeoff of LNG fuel inventory versus the probability of subsequent Design Day events. If a fully developed model cannot be developed prior to this winter, however, the basic tradeoff should still be evaluated and acted upon.*

- c. Xcel: The Department has concerns about Xcel's description of its limited ability to fill its LNG facilities this summer and its implication that the inventory level will be too limited to allow for economic dispatch this winter. Xcel should provide more specific information about the fuel inventory position of the LNG plant. Like CNP, Xcel should use the circumstances of the event, the prevailing winter, and the status of its fuel inventory to inform its dispatch decision.*
- 9. Customer Communications: The Department agrees with Xcel's approach of engaging in economic conservation requests in anticipation of extreme spot price spikes and studying customer responses. MERC, CNP, and GP should design plans to similarly study customer responses to conservation calls.*
- 10. Gas IRPs: The Department recommends the Commission not pursue the concept of a Gas IRP as a tool to prevent against future price spikes.*
- 11. Performance Based Gas Purchasing Plan, Minn. Stat. §216B.167: The Department does not recommend any particular action under this statute but will participate in a proceeding if initiated by the Commission.*
- 12. Natural Gas Innovation Act: The Department does not have any specific recommendations in this docket related to the NGIA.*



## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce**  
**Comments**

**Docket No. G999/CI-21-135, G008/M-21-138, G004/M-21-235, G002/M-21-610, and G011/M-21-611**

Dated this 14<sup>th</sup> day of **October 2022**

**/s/Sharon Ferguson**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mara	Ascheman	mara.k.ascheman@xcelen ergy.com	Xcel Energy	414 Nicollet Mall Fl 5  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-135_Official Service List
James J.	Bertrand	james.bertrand@stinson.co m	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_Official Service List
Brenda A.	Bjorklund	brenda.bjorklund@centerp ointenergy.com	CenterPoint Energy	505 Nicollet Mall  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_Official Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DGC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-135_Official Service List
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_Official Service List
Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-135_Official Service List
Catherine	Fair	catherine@energycents.org	Energy CENTS Coalition	823 E 7th St  St Paul, MN 55106	Electronic Service	No	OFF_SL_21-135_Official Service List
Sharon	Ferguson	sharon.ferguson@state.mn .us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-135_Official Service List
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-135_Official Service List
Matthew B	Harris	matt.b.harris@xcelenergy.c om	XCEL ENERGY	401 Nicollet Mall FL 8  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-135_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-135_Official Service List
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St  Bismarck, ND 58501	Electronic Service	No	OFF_SL_21-135_Official Service List
Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_Official Service List
Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360  St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-135_Official Service List
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-135_Official Service List
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_21-135_Official Service List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_21-135_Official Service List
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_Official Service List
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351  Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_21-135_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lisa	Peterson	lisa.r.peterson@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-135_Official Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-135_Official Service List
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_Official Service List
Peter	Scholtz	peter.scholtz@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota Street St. Paul, MN 55101-2131	Electronic Service	No	OFF_SL_21-135_Official Service List
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_21-135_Official Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-135_Official Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_21-135_Official Service List
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_Official Service List
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_21-135_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_Official Service List
James M	Strommen	jstrommen@kennedy- graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_Official Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-135_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jorge	Alonso	jorge.alonso@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-138_Official Service List
Mara	Ascheman	mara.k.ascheman@xcelen ergy.com	Xcel Energy	414 Nicollet Mall Fl 5  Minneapolis, MN 55401	Electronic Service	Yes	OFF_SL_21-138_Official Service List
James H.	Barkley	james.barkley@bakerbotts. com	Baker Botts	910 Louisiana Street  Houston, TX 77002-4995	Electronic Service	No	OFF_SL_21-138_Official Service List
James J.	Bertrand	james.bertrand@stinson.co m	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official Service List
Brenda A.	Bjorklund	brenda.bjorklund@centerp ointenergy.com	CenterPoint Energy	505 Nicollet Mall  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official Service List
Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-138_Official Service List
Barbara	Case	barbara.case@state.mn.us	Office of Administrative Hearings	600 N. Robert St.  St. Paul, Mn. 55101	Electronic Service	No	OFF_SL_21-138_Official Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-138_Official Service List
Richard	Dornfeld	Richard.Dornfeld@ag.state .mn.us	Office of the Attorney General-DOC	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul, Minnesota 55101	Electronic Service	No	OFF_SL_21-138_Official Service List
Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-138_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Catherine	Fair	catherine@energycents.org	Energy CENTS Coalition	823 E 7th St  St Paul, MN 55106	Electronic Service	No	OFF_SL_21-138_Official Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-138_Official Service List
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-138_Official Service List
Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY	401 Nicollet Mall FL 8  Minneapolis, MN 55401	Electronic Service	Yes	OFF_SL_21-138_Official Service List
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-138_Official Service List
Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official Service List
Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota St Suite 1400 St. Paul, MN 55101-2134	Electronic Service	No	OFF_SL_21-138_Official Service List
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St  Bismarck, ND 58501	Electronic Service	No	OFF_SL_21-138_Official Service List
Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official Service List
Andrew	Larson	andrew.m.larson@state.mn.us	Public Utilities Commission	121 7th Place E., #350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-138_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360  St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-138_Official Service List
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-138_Official Service List
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_21-138_Official Service List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_21-138_Official Service List
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official Service List
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351  Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_21-138_Official Service List
Jessica	Palmer Denig	jessica.palmer-Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	No	OFF_SL_21-138_Official Service List
Lisa	Peterson	lisa.r.peterson@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-138_Official Service List
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St  Milwaukee, WI 53203	Electronic Service	Yes	OFF_SL_21-138_Official Service List



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-138_Official Service List
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official Service List
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_21-138_Official Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-138_Official Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190  Richfield, MN 55423	Electronic Service	Yes	OFF_SL_21-138_Official Service List
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official Service List
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321  Milwaukee, WI 53203	Electronic Service	No	OFF_SL_21-138_Official Service List
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official Service List
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-138_Official Service List
James	Worlobah	james.worlobah@state.mn. us	Public Utilities Commission	121 7th Place E, Suite 350  St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-138_Official Service List
Michael A.	Yuffee	michael.yuffee@bakerbotts .com	Baker Botts	700 K St NW  Washington, DC 20001	Electronic Service	No	OFF_SL_21-138_Official Service List

[illegible]

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-235_Official
Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-235_Official
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St  Bismarck, ND 58501	Electronic Service	Yes	OFF_SL_21-235_Official
Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-235_Official
Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-235_Official
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-235_Official
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_21-235_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-235_Official
Jessica	Palmer Denig	jessica.palmer-Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	No	OFF_SL_21-235_Official
Lisa	Peterson	lisa.r.peterson@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-235_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	Yes	OFF_SL_21-235_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-235_Official
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-235_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-235_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_21-235_Official
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-235_Official
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_21-235_Official
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-235_Official
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-235_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	Yes	OFF_SL_21-235_Official
Michael A.	Yuffee	michael.yuffee@bakerbotts.com	Baker Botts	700 K St NW  Washington, DC 20001	Electronic Service	Yes	OFF_SL_21-235_Official

[illegible]

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Catherine	Fair	catherine@energycents.org	Energy CENTS Coalition	823 E 7th St  St Paul, MN 55106	Electronic Service	No	OFF_SL_21-610_Official Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-610_Official Service List
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-610_Official Service List
Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY	401 Nicollet Mall FL 8  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-610_Official Service List
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-610_Official Service List
Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-610_Official Service List
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St  Bismarck, ND 58501	Electronic Service	No	OFF_SL_21-610_Official Service List
Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-610_Official Service List
Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360  St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-610_Official Service List
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-610_Official Service List



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_21-610_Official Service List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_21-610_Official Service List
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-610_Official Service List
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351  Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_21-610_Official Service List
Jessica	Palmer Denig	jessica.palmer-Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	No	OFF_SL_21-610_Official Service List
Lisa	Peterson	lisa.r.peterson@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-610_Official Service List
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St  Milwaukee, WI 53203	Electronic Service	Yes	OFF_SL_21-610_Official Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-610_Official Service List
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-610_Official Service List
Peter	Scholtz	peter.scholtz@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota Street St. Paul, MN 55101-2131	Electronic Service	No	OFF_SL_21-610_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_21-610_Official Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-610_Official Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190  Richfield, MN 55423	Electronic Service	Yes	OFF_SL_21-610_Official Service List
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-610_Official Service List
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321  Milwaukee, WI 53203	Electronic Service	No	OFF_SL_21-610_Official Service List
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-610_Official Service List
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-610_Official Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-610_Official Service List
Michael A.	Yuffee	michael.yuffee@bakerbotts.com	Baker Botts	700 K St NW  Washington, DC 20001	Electronic Service	Yes	OFF_SL_21-610_Official Service List

[illegible]

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Catherine	Fair	catherine@energycents.org	Energy CENTS Coalition	823 E 7th St  St Paul, MN 55106	Electronic Service	No	OFF_SL_21-611_Official Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-611_Official Service List
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-611_Official Service List
Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY	401 Nicollet Mall FL 8  Minneapolis, MN 55401	Electronic Service	Yes	OFF_SL_21-611_Official Service List
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-611_Official Service List
Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-611_Official Service List
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St  Bismarck, ND 58501	Electronic Service	No	OFF_SL_21-611_Official Service List
Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-611_Official Service List
Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360  St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-611_Official Service List
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-611_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_21-611_Official Service List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_21-611_Official Service List
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-611_Official Service List
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351  Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_21-611_Official Service List
Jessica	Palmer Denig	jessica.palmer-Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	No	OFF_SL_21-611_Official Service List
Lisa	Peterson	lisa.r.peterson@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-611_Official Service List
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St  Milwaukee, WI 53203	Electronic Service	No	OFF_SL_21-611_Official Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-611_Official Service List
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-611_Official Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-611_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190  Richfield, MN 55423	Electronic Service	Yes	OFF_SL_21-611_Official Service List
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-611_Official Service List
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321  Milwaukee, WI 53203	Electronic Service	No	OFF_SL_21-611_Official Service List
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-611_Official Service List
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-611_Official Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-611_Official Service List
Michael A.	Yuffee	michael.yuffee@bakerbotts.com	Baker Botts	700 K St NW  Washington, DC 20001	Electronic Service	Yes	OFF_SL_21-611_Official Service List