STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION

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IN THE MATTER OF A COMMISSION INVESTIGATION INTO THE IMPACT OF SEVERE WEATHER IN FEBRUARY 2021 ON IMPACTED MINNESOTA NATURAL GAS UTILITIES AND CUSTOMERS	MPUC Docket No. G-999/CI-21-135
IN THE MATTER OF THE PETITION OF CENTERPOINT ENERGY FOR APPROVAL OF A RECOVERY PROCESS FOR COST IMPACTS DUE TO FEBRUARY EXTREME GAS MARKET CONDITIONS	MPUC Docket No. G008/M-21-138
IN THE MATTER OF THE PETITION BY GREAT PLAINS NATURAL GAS CO., A DIVISION OF MONTANA-DAKOTA UTILITIES CO., FOR APPROVAL OF RULE VARIANCES TO RECOVER HIGH NATURAL GAS COSTS FROM FEBRUARY 2021	MPUC Docket No. G004/M-21-235
IN THE MATTER OF A PETITION OF NORTHERN STATES POWER COMPANY D/B/A XCEL ENERGY TO RECOVER FEBRUARY 2021 NATURAL GAS COSTS	MPUC Docket No. G002/CI-21-610
IN THE MATTER OF THE PETITION OF MINNESOTA ENERGY RESOURCES CORPORATION FOR APPROVAL OF A RECOVERY PROCESS FOR COST IMPACTS DUE TO FEBRUARY EXTREME GAS MARKET CONDITIONS	MPUC Docket No. G011/CI-21-611

Initial Comments of the Citizens Utility Board of Minnesota

I. INTRODUCTION

At a hearing held on August 11, 2022, the Minnesota Public Utilities Commission (the "Commission") ordered four of Minnesota's rate-regulated natural gas utilities—CenterPoint Energy Resources Corp. ("CenterPoint"); Northern States Power Company d/b/a Xcel Energy ("Xcel"); Minnesota Energy Resources Corporation ("MERC"); and Great Plains Natural Gas Co. ("Great Plains" and, collectively with CenterPoint, MERC, and Xcel, the "Gas Utilities")—to each file a plan "on how it will improve or modify its practices to protect ratepayers from extraordinary natural gas price spikes in the future."[1] Subsequently, on August 23, 2022, the Commission issued a Notice of Comment Period in the above-referenced dockets clarifying what it expected the Gas Utilities to include in their submitted plans. Specifically, the Commission requested utility plans and comments on the following (among other) details:

- A plan describing how each Company will improve or modify practices related to interruptible tariffs, peak-shaving, and storage dispatch, including updates to tariff language as necessary.

- Identification of "any statutory or rule changes that could be implemented to protect ratepayers from future price spikes."

- An analysis of whether utilities considered "filing a plan pursuant to Minn. Stat. § 216B.167 (Performance-Based Gas Purchasing Plan)," including why each utility is "not using the statute if they have chosen not to proceed with such a plan."

- Identification of "how integrated resource planning could facilitate ratepayer protection from price spikes."[2]

The Citizens Utility Board of Minnesota ("CUB" "we" "our" "us"), with the assistance of its outside expert, Strategen Consulting, LLC,[3] submits these comments in response to the Gas Utilities' filings. We do not address every aspect of the utilities' filings in these comments; rather, we focus on those areas that we believe most warrant near-term action by the Commission. In summary, CUB recommends the following;

1. The Commission should prioritize solutions that do not require new, long-term investments.

2. The Commission should reject the bright-line economic trigger proposed in the Joint Utilities' filing as a means of determining when it is appropriate to utilize curtailments, peak-shaving resources, and storage to address future price spikes.

    a. The Commission should create an economic threshold that triggers a filing and review of utility actions to determine prudence during a pricing event.

    b. The Commission should order each of the Gas Utilities to develop two interruptible tariffs—one tariff focused on economic curtailments and the other focused on reliability curtailments—for inclusion in each Gas Utility's next rate case.

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[1] *See* Minnesota Public Utilities Commission, Recorded Webcast of August 11, 2022 Hearing, available at https://minnesotapuc.granicus.com/MediaPlayer.php?view_id=2&clip_id=1768 (as of the date of this filing, the Commission's order following this August 11, 2022 hearing has yet to be published).

[2] *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers*, MPUC, Notice of Comment Period, Docket No. G-999/CI-21-135 (August 23, 2022) ("Notice of Comment Period") at 2.

[3] Strategen Consulting, LLC, a California firm, is comprised of a team of well-respected leaders with technical, regulatory, product and organizational expertise in energy markets who have decades of experience working closely with consumer advocates, governments, utilities, research institutions, technology providers, project developers, and large energy users to evaluate, analyze, and implement strong regulatory and policy strategies.

   c. The Commission should direct each Gas Utility that currently owns peaking facilities (Xcel and CenterPoint) to refile in these dockets more dynamic proposals that recognize that calling on peaking resources depends on the economic and situational context of the utility and the market.

3. The Commission should order the Gas Utilities to work with stakeholders to propose in their September 2023 AAA filings a risk-sharing mechanism that would incentivize the utilities to minimize exposure to future gas price spikes.

4. The Commission should require Minnesota's natural gas utilities to file integrated resource plans and should open a new docket seeking input on the procedure and content of those plans.

5. The Commission should not open a separate docket to assess the Gas Utilities' hedging strategies without first considering whether a simpler risk-sharing mechanism is more likely to protect ratepayers in the event of future price spikes. If the Commission does open a separate docket to assess the Gas Utilities' hedging strategies, it should authorize the Department to engage an outside expert to help build the record in that docket.

II. ANALYSIS

A. <u>The Commission should prioritize solutions that do not require new, long-term investments.</u>

As a preliminary matter, CUB's recommendations are informed by a strong preference that the Gas Utilities focus on solutions that do not require new, long-term investments unless and until the Gas Utilities are required to file transparent, long-term planning that is subject to the scrutiny of intervening parties and, ultimately, Commission approval.

Historically, consumption of natural gas has seen steady growth,[4] supporting the continued build-out of a utility system that is heavily dependent on large capital investments. However, indications suggest that distribution gas system growth may soon slow. The U.S. Energy Information Administration projects that residential gas demand will shrink between 2022 and 2050, and that domestic, non-industrial demand overall will grow very slowly, due primarily to increased efficiency in space heating.[5] It is possible that demand could shrink more quickly. Natural gas costs are higher today than at any point since the fracking boom,[6] further encouraging conservation efforts and hastening the emerging cost parity of electrification alternatives for homes and businesses. Conservation and electrification incentives in the Inflation Reduction Act may further speed demand reductions. Additionally, the gas system could be subject to future greenhouse gas regulations, and it may be necessary to reduce natural gas usage to achieve climate goals, including Minnesota's statutory greenhouse gas reduction goal.[7]

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[4] U.S. Energy Information Administration, Natural Gas Data (last visited Oct. 13, 2022), available at https://www.eia.gov/dnav/ng/hist/na1490_smn_2a.htm.
[5] U.S. Energy Information Administration, Annual Energy Outlook 2022 (last visited Oct. 13, 2022), available at https://www.eia.gov/outlooks/aeo/production/sub-topic-03.php.
[6] U.S. Energy Information Administration, Henry Hub Natural Gas Spot Price (last visited Oct. 13, 2022), available at https://www.eia.gov/dnav/ng/hist/rngwhhdm.htm.
[7] Minn. Stat. § 216H.02.

These factors bring a new level of uncertainty to the future of the natural gas distribution system. It is possible that investments made to meet today's peak demands may not be needed in the future. Infrastructure investments are often decades-long propositions. If demand no longer grows at the same rate, or if it shrinks, rates will need to increase to pay for those investments, further incentivizing conservation and electrification, and so on. If such a scenario were to arise, it would have potentially catastrophic effects on those customers least able to make the investments needed to leave the gas system. To be clear, CUB is not projecting such a future. However, even if projections of a gas utility "death spiral" [8] do not come to pass, signs of flat or even contracting demand indicate new risks for utility investments.

For this reason, CUB recommends that, if possible, the Gas Utilities avoid new, large-scale investments until those investments can be informed by transparent, long-term planning.

B. <u>The Commission should reject the bright-line economic trigger proposed in the Joint Utilities' filing as a means of determining when it is appropriate to utilize curtailments, peak-shaving resources, and storage to address price spikes.</u>

The Joint Utilities propose the following economic trigger (which the Gas Utilities then each incorporate into their individual filings) as a proposed means for determining when the utility will engage in economic curtailments; dispatch peaking resources; and/or withdraw gas from storage in response to extreme pricing events:

> *The prior gas day (or multiple days in the case of weekends and holidays) settled Gas Daily index price at [any of the identified pricing hub(s) where the utility would purchase daily supplies]:*
>
> *1. is greater than or equal to $50.00 per Dth; and*
> *2. is greater than or equal to five times the weighted average cost of gas forecast for the month at issue in the utility's filed PGA for that month.*[9]

The pricing hubs referenced would be Ventura, Demarcation ("Demarc"), or Viking-Emerson for CenterPoint;[10] Ventura and Emerson-Viking GL for MERC Consolidated;[11] and Ventura or Demarc for MERC NNG[12] and Xcel.[13] In addition to price-based curtailments, Xcel and CenterPoint propose to

[8] *See, e.g.*, Michael E. Webber, "Energy Blog: Are Gas utilities About to Enter a Death Spiral?" asme.org (Sept. 8, 2022), available at https://www.asme.org/topics-resources/content/energy-blog-are-gas-utilities-about-to-enter-a-death-spiral; Canary Media, "The Future of Natural Gas" (Dec. 9, 2021), available at https://www.canarymedia.com/podcasts/catalyst-with-shayle-kann/catalyst-podcast-the-future-of-natural-gas.

[9] *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers*, Gas Utilities' Joint Comments, Docket No. G-999/CI-21-135 (Sept. 15, 2022) ("Gas Utilities Joint Comments") at 3.

[10] *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers*, CenterPoint Comments, Docket No. G-999/CI-21-135 (Sept. 15, 2022) ("CenterPoint Comments") at 8.

[11] *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers*, MERC Comments, Docket No. G-999/CI-21-135 (Sept. 15, 2022) ("MERC Comments") at 5.

[12] MERC Comments at 5.

[13] *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers*, Xcel Comments, Docket No. G-999/CI-21-135 (Sept. 15, 2022) ("Xcel Comments") at 15.

apply the same economic trigger for peaking plant dispatch. CenterPoint also proposes to apply the trigger to its incremental storage withdrawals, as described below.

CUB has high-level concerns about the objective trigger the Joint Utilities have proposed. As discussed in more detail below, we strongly disagree that using a bright-line, objective threshold is an appropriate means of determining when utilities should take action to mitigate ratepayer harm associated with price spike events. As the Minnesota Department of Commerce ("the Department") noted in its Arguments and Exceptions to the ALJ Reports filed in these dockets:

> The Gas Utilities must operate their businesses prudently. This means applying their technical expertise and industry experience to changing market and weather conditions to deliver safe and reliable service at just and reasonable rates. Acting prudently requires constant reassessment as facts and circumstances change.

Relying on a bright-line trigger such as that proposed by the Joint Utilities removes rather than enhances the utilities' ability and obligation to apply their technical expertise and industry experience to changing market and weather conditions to balance safety, reliability, and affordability under variable conditions. Future price spike events may, and likely will, look different than that which occurred in February 2021. Utilities should not be bound by bright-line objective metrics that cannot possibly account for all variables, nor should they be permitted to justify potentially imprudent decisions by basing them on a bright-line threshold without considering the totality of the circumstances. This general objection to the Joint Utilities' proposed bright-line trigger informs and underlies our more specific comments and recommendations below.

i. The Commission should create an economic threshold that triggers a filing and review of utility actions to determine prudence during a pricing event.

In contrast to the Joint Utilities' proposal, we recommend that the Commission adopt a filing and review requirement if prices exceed a certain threshold. If market prices exceed a certain threshold, the utility would make a filing to the Commission identifying its costs, what actions the utility took in response to the costs, and justifications for why its actions were prudent. Parties reviewing this filing could, if warranted, then recommend that the Commission order a prudence review of those costs, or the Commission could order such review on its own initiative. If the Commission calls for such a review, the cost of gas above the threshold should not be collected from customers until the utility has demonstrated prudent action. As we will explain in greater detail below, triggering this threshold does not predetermine what actions the utility should have taken – that is context specific. The filing requirement does not imply the utility should have, or should not have, called upon any specific resource. The purpose of this filing is to create an automatic process for review when prices reach a certain threshold.

We are open to discussing the exact threshold price. However, for purposes of discussion, we propose the Commission adopt $20/Dth, which was the cost it considered to be "extraordinary" during its review of the 2021 Winter Storm Uri costs.

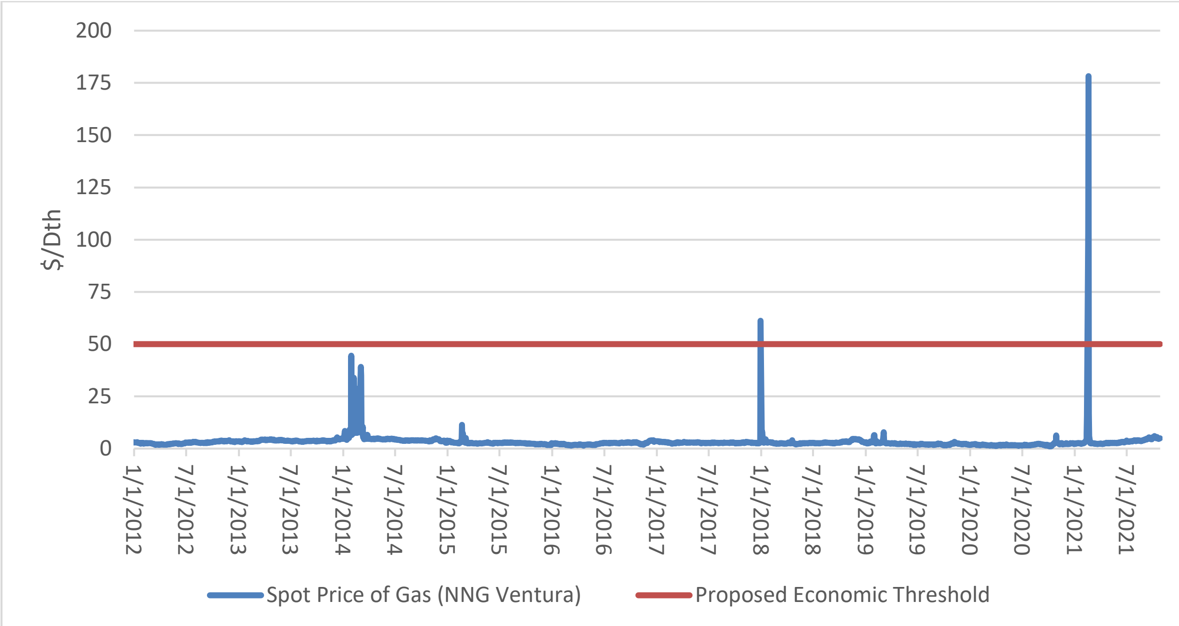
ii. Interruptible Tariffs

Each utility proposes to modify its interruptible tariffs in order to apply the above trigger to determine when to exercise economic curtailments. First, CUB wishes to make clear that a tariff modification is not immediately necessary to ensure the Gas Utilities utilize curtailment to help mitigate ratepayer harm associated with any extreme price spike events that occur in the 2022-2023 heating season. The disallowances previously ordered in these dockets are indicative of the Commission's determination that the utilities are accountable for acting prudently to help protect ratepayers from financial harm in future price spike events—including by calling for price-based curtailments when doing so reasonably balances the utility's responsibility for providing safe, reliable, and affordable gas service. In determining that CenterPoint and Great Plains[14] both acted imprudently by *not* calling for economic curtailments during the February Event, the Commission rejected these utilities' arguments that utilities are unable to exercise economic curtailments just because existing tariff language does not expressly "provide for" this action. (As CUB has consistently argued throughout these proceedings, none of the utilities' interruptible tariffs expressly allow *or* prohibit economic curtailments; rather, the tariffs afford the utilities broad discretion to call for curtailments.) We recognize that additional edits to interruptible tariffs may be helpful to provide clarity on when and how economic curtailments are exercised; however, in the near-term, tariff revisions should not be treated as a prerequisite to the utilities exercising economic curtailments (if the totality of the circumstances call for such an action) during the 2022-2023 heating season and beyond.

Second, CUB is concerned that the Joint Utilities' proposed tariff revisions do not sufficiently distinguish between economic and reliability-based curtailments, thus failing to enhance ratepayer protections in future price spike events. As illustrated in Figure 1 below, the proposed economic threshold of $50/Dth would have been triggered on only two occasions over the previous decade. One such occasion is the February Event at issue in the current docket. The only other occasion is the extreme cold event that occurred around the 2017/2018 New Year holiday. In both cases, spiking gas prices coincided with, and were partially caused by, disruptions in gas supply, which also threatened reliability.

[14] CUB, the Department, and OAG reached a settlement with MERC prior to the August 4, 2022 hearing, meaning the Commission did not reach a formal finding regarding MERC's curtailment of interruptible customers during the February Event. However, Commissioner questions and comments during the hearing—and the findings they reached with respect to other utilities' curtailments practices—strongly suggest that a majority of Commissioners did not accept MERC's position that it acted prudently when not calling for curtailments during the February Event.

Figure 1: Spot Price of Gas (NNG Ventura) vs. Proposed Economic Threshold, 2012-2021



The Gas Utilities have not sufficiently explained the significance or usefulness of the proposed economic threshold. In response to an information request asking the utilities explain how they developed the threshold, the Joint Utilities only generally responded that the threshold meets the Commission's directive while ensuring these resources are available to "ensure continuous and reliable service to customers."[15] The Gas Utilities did not provide any quantitative analysis, or even a detailed narrative explanation, as to why $50/Dth is more appropriate than an alternative such as $20/Dth, which the Commission identified as an extraordinary cost in Docket No. G999/CI-21-135. A specific, unreasonably high economic trigger blurs the lines between economic and reliability events due to their correlation at high prices. Such a tariff may also shield the utilities from clear performance evaluations when calling economic and reliability benefits — a problem that exists currently. Most worrisome, an unreasonably high economic trigger may not be reached until far after utilities should have known to call for economic curtailments.

For example, in the current dockets, CUB Witness Cebulko noted that spot prices on February 10 and 11, 2021, prior to the long weekend, had reached the 98th percentile at Emerson, Demarc, and Ventura as compared to the past five years of spot prices at each respective hub.[16] At Ventura, this translates to $7.245/Dth and $15.613/Dth on February 10 and 11, respectively.[17] The utilities had also been warned of tightening pipeline supply conditions and that the worst of the storm was yet to come.[18] Under the utilities' proposed threshold, however, the utilities could argue that, even at a substantially higher price of up to $49/Dth, and under the same reliability conditions that existed in February 2021, they would be shielded from responsibility to curtail customers given that the economic threshold had not been triggered. In contrast, the Commission's cost disallowances due to failure to curtail were

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[15] Joint Utilities' Response to CUB Information Request 01 ("CUB IR-01"), enclosed as Attachment A.
[16] *See, e.g.*, *In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery Process for Cost Impacts due to February Extreme Gas Market Conditions*, Citizens Utility Board of Minnesota, Brad Cebulko Direct Testimony (Dec. 22, 20210) ("Cebulko Direct") at 20.
[17] S&P Capital IQ Pro Historical Spot Natural Gas Index.
[18] Cebulko Direct at 20.

based not on a specific threshold, but rather on what the utilities knew or should have known about the totality of the circumstances that existed at the time.[19] Tariff adjustments should *clarify,* not obscure, the distinction between when and why curtailments are called for reliability reasons versus economic reasons. With this in mind, CUB recommends that the Commission order the utilities to propose two distinct tariffs to reflect the value of each type of interruption.

Under CUB's proposed framework, the economic interruption tariff should have a non-binding economic threshold that may depend or vary, for instance, on the time of year within the heating season or the availability of other resources, among other potential factors. (See the subsequent section on peaking plants, below). Importantly, the threshold should be a "soft" threshold, meaning that it does not preclude the utility from curtailing at a lower threshold if deemed prudent based on the totality of the circumstances. Rather, if prices reach the threshold, it would trigger the filing requirement described above. The economic trigger should also be substantially lower than that currently proposed by the Joint Utilities.

Finally, CenterPoint proposes to limit the number of times that a customer can be curtailed for economic reasons to five 24-hour gas days during each heating season (November 1-March 31) and proposes no limit for the number of days that customers can be curtailed for other reasons.[20] (MERC and Xcel did not propose to limit the number of days that a customer can be curtailed.) In addition, under CenterPoint's proposal, "[c]ustomers who are called to, and do, curtail when the above pricing conditions occur will not be subject to extraordinary cost-recovery surcharges if any such surcharges are established to recover the cost of daily spot gas or swing gas purchased during the period the economic curtailment was in effect." Customers who fail to curtail when requested to do so will not be granted this surcharge waiver.[21] We are not opposed to limiting the number of times an economic curtailment can be exercised per heating season. However, whether "five 24-hour gas days during each heating season" is the appropriate limitation may depend on the specific details of each Gas Utility's economic tariff. We are also not opposed to excluding customers who are called to, and do, curtail under an economic tariff from any extraordinary cost-recovery surcharges, so long as customers that do not heed calls for economic curtailment remain subject to those charges and any penalties otherwise imposed under the applicable tariff.

Table 1 below summarizes CUB's proposed framework.

Table 1: CUB's Proposed Framework for Interruptible Tariffs

	Economic Tariff	**Reliability Tariff**
Frequency of Calls	Triggered more frequently (often prior to reliability trigger)	Triggered less frequently (often following economic trigger)
Discount Level	Provides higher rate discount than reliability tariff	Provides lower rate discount than provided by current tariff
Information on Threshold	Soft/non-binding threshold (for instance, may adjust based on time	Soft/non-binding threshold (for instance, may adjust based on time occurring during

[19] *See* Minnesota Public Utilities Commission, Recorded Webcast of August 11, 2022 Hearing, available at https://minnesotapuc.granicus.com/MediaPlayer.php?view_id=2&clip_id=1768 (as of the date of this filing, the Commission's order following this August 11, 2022 hearing has yet to be published).
[20] CenterPoint Comments at 12-13.
[21] CenterPoint Comments at 13.

	occurring during heating season, etc.) triggers filing requirement; threshold should be lower than currently proposed and informed by analysis of historical and forecasted spot prices; threshold should not preclude curtailment at lower threshold given totality of circumstances	heating season, availability of other resources, etc.); threshold triggers filing requirement but does not preclude curtailment at lower threshold given totality of circumstances
Filing Requirements	Reaching threshold triggers utility notice filing requirement, which may prompt parties to request a prudence review. If Commission orders prudence review, cost of gas above threshold will not be collected from any customers until the utility has demonstrated prudent action	Reaching threshold triggers utility notice filing requirement, which may prompt parties to request a prudence review. If Commission orders prudence review, cost of gas above threshold will not be collected from any customers until the utility has demonstrated prudent action
Additional Information	Consumer protection provision that economic triggers are not called more than a certain number of times per heating season.	Consumer protection provision that economic triggers are not called more than a certain number of times per heating season.

Given that each rate discount will be specific to each utility and will impact revenue, the Commission should require each utility to propose two tariffs that separate the value of economic and reliability-based curtailment, respectively, in the next rate case. Each proposal should also include a plan for transitioning to the new tariffs, including a customer education component.

iii. Peaking Plants

Those utilities that currently own peaking plants (Xcel and CenterPoint) propose to apply the same economic trigger discussed above to determine when to dispatch peaking resources to address price spikes.

Xcel proposes to apply the economic trigger to dispatch its Wescott plant up to its maximum deliverable capacity of 156,000 Dth/day, depending on inventory, beginning in the 2023-2024 heating season.[22] Because work was done on the plant's liquefaction equipment during the summer of 2022, Xcel does not expect sufficient time to liquefy the inventory of LNG needed to economically dispatch during the 2022-2023 heating season.[23] Although Xcel has both LNG and propane plants, Xcel focused its proposal on its LNG plant because its propane plants have smaller daily withdrawal capacities and are subject to greater uncertainty in the price and timing of replacement fuels.[24] Xcel believes that it is important to use the same economic trigger for curtailment and peaking plant dispatch because "interruptible customers do not pay for [Xcel's] peaking plants… If the triggers differ, [Xcel] would need to reallocate costs to ensure different classes of customers are fairly paying for the infrastructure they

[22] Xcel Comments at 15.
[23] Xcel Comments at 15.
[24] Xcel Comments at 16.

use."[25] (Conversely, CenterPoint confirms that it does allocate peak shaving facilities to all customers, both firm and interruptible.[26])

CenterPoint proposes to apply the same economic trigger to dispatch up to 25 percent (18,000 Dth/day) of the utility's total daily LNG capacity.[27] CenterPoint justified its relatively conservative approach by arguing that it balances reliability with the mitigation of price spike impacts.[28] CenterPoint does not explain how it arrived at a 25% limit rather than a different percentage limit. CenterPoint proposes to begin dispatching peaking plants for economic reasons after January 20th annually "to ensure that peak shaving supplies are available to meet customer requirements through December and the early part of January, when design day weather is statistically more likely to occur with greater frequency."[29]

Again, CUB wishes to make clear that the disallowances previously ordered in these dockets are indicative of the Commission's determination that the Gas Utilities are not practically or legally prohibited from dispatching peaking resources to mitigate harm associated with extreme pricing events. We do not believe that the Commission ordering the Gas Utilities to use peaking resources in this way is necessary as a prerequisite to the Gas Utilities dispatching peaking resources in the 2022-2023 heating season (and beyond) to address price spikes that may occur, so long as the utility prudently determines that such an action balances the utility's responsibility for providing safe, reliable, and affordable gas service.

In general, CUB is again concerned about the utilities' proposal to draw a bright line for the economic dispatching of peaking plants, as it does not take into account the external environment or the utility's specific situation. The threshold for calling on any resource, particularly peaking resources, should consider the external situation of the utility and may differ from the threshold for calling on curtailment. Further, peaking plants and interruptible tariffs are different resources, and should thus be treated differently. Interruption is a demand-side resource that impacts a customer's use of gas; the frequency and scale of calling on customer curtailment must thus be considered and managed. Peaking resources are supply-side resources that do not impact demand; however, it is vital that peaking resources remain available throughout the duration of the heating season to ensure reliability.

For instance, as indicated by CenterPoint's proposal to hold peaking resources until January 20 for economic dispatch, there should be a higher threshold for dispatching peaking plants early in the heating season to ensure that the utility has sufficient resources to meet peak needs later on in the season. The utility may be justified in a more conservative threshold in the early part of the winter but may be willing to call upon its peaking resources at a comparatively much lower cost of gas in March if resource reserves are still abundant. Given that the decision to dispatch peaking resources changes based on each utility's respective environment and resource portfolio throughout the heating season, it is inappropriate for the utilities to establish a single threshold that ignores this critical context.

[25] Xcel Comments at 17.
[26] CenterPoint Response to CUB Information Request 01 ("CUB IR-01"), enclosed as Attachment B.
[27] CenterPoint Comments at 10.
[28] CenterPoint Response to CUB Information Request 02 ("CUB IR-02"), enclosed as Attachment C.
[29] CenterPoint Comments at 10.

CUB appreciates that CenterPoint's comments acknowledge that calling on peaking resources is context-specific. Unfortunately, its proposal to initiative peak shaving for economic reasons following January 20 is also too rigid. It would not be reasonable for CenterPoint to claim, for example, that it should not dispatch any peaking resources for economic reasons should spot prices exceed $100/Dth on January 15. Although a higher economic threshold may be warranted earlier in the heating season, ruling out economic dispatch at any price is not.

Moreover, the utilities' proposal for a single threshold that applies to interruptions and all peak shaving resources ignores the concept of economically dispatching resources to manage costs for customers. Each resource, whether it is an economic curtailment program, a reliability-only curtailment program, a propane-air peak shaving plant, or an LNG plant, will have its own fixed and variable costs. The utilities' proposed economic threshold does not recognize that certain resources will be less expensive to operate and would save customers money, nor does it consider how certain resources may be better situated to meet a specific need.

CUB recommends that the Commission direct each utility that currently owns peaking facilities (Xcel and CenterPoint) to refile in the present dockets (as applicable to the filing utility) more dynamic proposals that recognize that calling on peaking resources depends on the economic and situational context of the utility and the market." As in the case of interruptible tariffs, the Gas utilities should be required to demonstrate prudency to recover costs above the economic threshold. Such a requirement would not—and should not—prevent the Gas Utilities from dispatching peaking resources at or below the threshold if such action is prudent. In the interim, it is clear that peaking resources can be dispatched for economic reasons and that CenterPoint and Xcel are responsible for prudently managing their peak-shaving operations to balance cost and risk for customers.

iv. Storage

CenterPoint proposes to apply the same economic trigger to withdraw up to 5,000 Dth/day of incremental storage above the current planned operational maximum from its Waterville facility, for a total daily planned withdrawal of up to 55,000 Dth/day.[30] CenterPoint notes the possibility that conditions may not allow the implementation of plans to increase storage withdrawals, as the ability to exceed 50,000 Dth/day in storage deliveries depends on storage field pressures and NNG pipeline conditions outside of the utility's control.[31]

Again, CUB wishes to make clear that the disallowances previously ordered in these dockets are indicative of the Commission's determination that the utilities are not practically or legally prohibited from withdrawing gas from storage to mitigate harm associated with extreme pricing events, so long as doing so prudently balances the utility's obligation to provide safe, reliable, and affordable service. (Though, we also acknowledge that utilities must consider pipeline imbalance penalties, storage contracts, and other factors when determining whether and when to withdraw gas from storage.) We do not believe an objective, bright-line trigger, such as that proposed by the Joint Utilities, is alone an appropriate mechanism to determine whether and when to withdraw gas from storage. Rather, the Gas Utilities should consider the totality of the circumstances when determining whether, when, and how much gas to withdraw from storage. We do not believe Commission action is necessary at this stage as a prerequisite to the Gas Utilities taking this action.

[30] CenterPoint Comments at 9.
[31] CenterPoint Comments at 9-10.

C. <u>The Commission should order the utilities to work with stakeholders to propose a risk-sharing mechanism in their September 2023 AAA filings that would incentivize utilities to minimize exposure to future gas price spikes.</u>

In addition to requiring that utilities identify any statutory or rule changes that could protect ratepayers from future gas price spikes, the Commission required each utility to analyze whether it considered "filing a plan pursuant to Minn. Stat. § 216B.167 (Performance-Based Gas Purchasing Plan)," including why the utility is "not using the statute if they have chosen not to proceed with such a plan."[32] According to § 216B.167, a Performance-Based Gas Purchasing Plan should provide "incentives for the utility to achieve lower natural gas costs than would have been achieved in the absence of the plan…by linking financial rewards and penalties to natural gas costs." Actual natural gas costs should be measured against "benchmarks [that] reflect relevant market conditions and represent reasonable and achievable natural gas costs in Minnesota for the term of the plan."[33] In addition, the plan should include a sharing mechanism "through which the utility shares with its customers the difference between actual natural gas costs and the plan's benchmark costs during the term of the plan."[34]

According to the Joint Utilities, "[t]he Gas Utilities do not believe that changes to the AAA or PGA rules are needed at this time, nor have the Gas Utilities identified any specific rule changes at this time that would help to protect customers from daily gas price spikes.[35] To the extent the Commission disagrees, the Gas Utilities request that the Commission engage in a robust process as it did the last time rule changes were considered, especially considering all of the other policy discussions about natural gas regulation (e.g., the Natural Gas Innovation Act; the Future of Gas docket) currently pending."[36]

Regarding § 216B.167, CenterPoint and MERC each stated that, because "there are a number of factors that impact the market price of gas supplies, all of which are outside the control of the Gas Utilities," the companies have continued to use the PGA mechanism because it "provides greater flexibility for the Compan[ies] to react to market conditions and opportunities to meet customer needs" while ensuring that each company "procures reasonably priced natural gas supplies in light of market conditions and customer needs."[37] Xcel claims that it did not propose a Performance-Based Gas Purchasing Plan because the Company "had difficulty identifying benchmarks that would provide more protection to customers than the existing PGA rules." Xcel claims that it would be willing to participate in further discussions on the topic, but that "such a mechanism would likely take a long time to develop well."[38]

CUB disagrees that the Annual Automatic Adjustment ("AAA") or Purchased Gas Adjustment ("PGA") rules provide sufficient protection to customers and that no changes are needed. As CUB Witness Nelson testified in the current dockets' prudency review process, the PGA and AAA processes may reduce regulatory lag for utilities and conserve utility and public resources. However, these same

[32] Notice of Comment Period at 2.
[33] Minn. Stat. § 216B.167
[34] Minn. Stat. § 216B.167.
[35] Gas Utilities Joint Comments at 6.
[36] Gas Utilities' Joint Comments at 6.
[37] CenterPoint Comments at 25; See also, MERC Comments at 11.
[38] Xcel Comments at 26.

mechanisms also reduce the utility's incentive to control costs and enable utilities to pass all risk to ratepayers. As explained by Witness Nelson:

> Under traditional regulation, utilities are incented to minimize costs between rate cases, because they cannot increase rates. The PGA is an exception. The PGA allows utilities to change the rate charged to customers monthly and pass through these costs without a rate case. Because the PGA allows the utility to pass through costs to ratepayers between rate cases, it reduces the utility's incentive to control and manage fuel costs. The reduced incentive to control and manage fuel costs impacts utility decision making…
>
> Adjustment mechanisms can provide a disincentive for efficient management of fuel and natural gas costs because they largely remove the risk of higher fuel costs and variability from the utility and place it with ratepayers. Because natural gas utility fuel costs are pass-throughs to customers, and the utility can adjust its baseline and recovery on a relatively frequent basis, the structure of the mechanism provides a relatively weaker incentive to the utility to proactively engage in economic dispatch of available resources or otherwise avoid unnecessary costs that the utility anticipates will be recoverable from their customers. The mechanism incentivizes the utility to minimize risk and ensure quick cost recovery. Said another way, adjustment mechanisms incent a least-risk path for the utility, which is unlikely to result in a reasonable balance of risk and cost for the ratepayer.[39]

It is becoming increasingly apparent[40] that it is not reasonable for gas utilities to pass 100 percent of gas costs to customers, particularly given that, although the spot price of gas may itself be outside of the Gas Utilities' control, procurement, operational, and hedging decisions that impact the costs passed to customers are not. Utilities have a variety of options at their disposal for reducing the total costs passed to customers through the PGA, including interruptible tariffs, dispatching storage and/or peaking plants, revising financial and physical hedging practices, modifying alternative fuel (hydrogen, RNG) strategies, and/or investing in non-pipeline alternatives such as energy efficiency or electrification, which are less susceptible to gas price volatility given the greater diversity in electric supply.

As recognized in § 216B.167 and by regulators in several jurisdictions, including Minnesota, one option for addressing these perverse economic incentives is to introduce risk sharing mechanisms such as dead bands or sharing bands.[41] As Witness Nelson testified:

> A dead band provides bounds within which cost variations are absorbed by the utility, whether positive or negative. A sharing band provides bounds within which customers and the utility will share any variance in costs at a specified sharing split. Sharing bands can be symmetrical

[39] See, e.g, *In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery Process for Cost Impacts due to February Extreme Gas Market Conditions*, Citizens Utility Board of Minnesota, Ron Nelson Direct Testimony (Dec. 22, 20210) ("Nelson Direct") at 14-16.

[40] See, e.g., Frank Jossi "Natural gas prices are rising: That's worse news for ratepayers than utilities," Energy News Network (Oct. 12, 2022), available at https://energynews.us/2022/10/12/natural-gas-prices-are-rising-thats-worse-news-for-ratepayers-than-utilities/.

[41] See, e.g., Fuel and Purchased Power Survey Results, Wyoming Office of Consumer Advocate (September 23, 2015), available at https://pubs.naruc.org/pub/4AA28D50-2354-D714-5149-B773EFC3EFEF; "A Hard Look at Incentive Mechanisms for Natural Gas Procurement," The National Regulatory Research Institute (November 2006), available at https://pubs.naruc.org/pub/FA864044-E284-E4FD-A64D-DC5E0CED7D02.

or asymmetrical. Some states have also implemented sharing splits between utilities and customers.[42] A sharing split specifies the division of certain costs between the utility and customers. Sharing splits have ranged from 80-20 to 98-2 (customer-utility).[43]

The modification of adjustment mechanisms via addition of dead bands, sharing bands, and sharing splits provides an incentive for utilities to balance cost and risk by establishing a level of risk sharing between the utility and customers rather than passing on all cost variations to customers.[44]

Another option for risk sharing is to allocate a fixed percentage of fuel costs to the utility. For example, rather than a 100 percent pass-through of gas costs, the Commission could move towards a model that more fairly shares risk by allocating 97-98 percent of gas cost fluctuations to customers and the remaining 2-3 percent to the utility. Although 2-3 percent may appear minimal, the risk to the utility should be sufficient to align the utility's financial incentives with its customers. The risk sharing element can be capped at an appropriate annual dollar amount to protect the utility from significant unanticipated increases in gas prices while still incenting reduction in exposure to price volatility.

In Minnesota, there is precedent for regulators addressing the perverse economic incentives created by adjustment mechanisms in the electricity sector. In 2017, after years of debate on the topic, the Commission adopted changes to the Fuel Clause Adjustment (FCA)—the PGA's counterpart in the electricity sector—in order to "more equitably balance the interests of a utility and its ratepayers…permit more effective prudence review of fuel costs, better protect consumers from potentially unreasonable rates, and increase clarity of anticipated fuel costs, enhancing a customer's ability to make meaningful choices about energy usage."[45] In its Order, the Commission set recovery of the utility's fuel costs on an annual, rather than monthly basis, required utilities to publish monthly fuel rates in advance of each year, and ordered the utilities to demonstrate the prudence of costs before allowing recovery of under collections.[46]

Although a risk sharing mechanism would undoubtedly benefit ratepayers by incenting utilities to control costs and minimize exposure to price spikes, developing a specific risk-sharing mechanism may require time and negotiation among parties. As demonstrated, multiple options exist that would incentivize utilities to reasonably balance cost and risk. The Commission should order the Gas Utilities to propose a risk-sharing mechanism in their September 2023 AAA filings that would incentivize utilities to minimize exposure to future gas price spikes. Three months prior to the AAA filing, the Gas Utilities should jointly convene stakeholders—including but not limited to the Attorney General's office, Department of Commerce, and Citizens Utility Board—to discuss each Gas Utilities' draft proposal prior to filing. <u>The Gas Utilities should provide their respective draft proposals to stakeholders in advance of convening the parties.</u> Through a series of workshop meetings, the parties

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[42] Settlement Stipulation, Washington PUC Docket No. UE-011595, and Order No. 99-272, Oregon PUC Docket No. UM 903 (April 19,1999), and Order No. 30715, Idaho PUC Case No. IPC-E-08-19 (January 9,2009); Final Decision and Order No. 35545, Hawaii PUC Docket No. 2016-0382 (June 22, 2018) and Order No. 99-272, Oregon PUC Docket No. UM 903 (April 19, 1999).
[43] Settlement Stipulation, Washington PUC Docket No. UE-011595, and Order No. 99-272, Oregon PUC Docket No. UM 903 (April 19,1999), and Order No. 30715, Idaho PUC Case No. IPC-E-08-19 (January 9, 2009).
[44] Nelson Direct at 16-17.
[45] I*n the Matter of an Investigation into the Appropriateness of Electric Energy Cost Adjustments*, MPUC, Order Approving New Annual Fuel Clause Adjustment Requirements and Setting Filing Requirements, Docket No. E-999/CI-03-802 (December 19, 2017) at 8.
[46] *Id.*

will work to collaboratively develop a risk-sharing mechanism to be presented by each Gas Utility in its AAA. If the parties are unable to come to an agreement prior to the filing deadline, the Commission will at least benefit from a more well-informed set of intervenors who can help identify key decision points for the Commission.

D. The Commission should require Minnesota's natural gas utilities to file integrated resource plans and should open a new docket seeking input on the procedure and content of those plans.

i. *The purpose of a Gas IRP*

In testimony filed in the contested case proceeding arising from the present dockets, CUB witness Nelson testified that, because Minnesota's gas utilities are not currently required to file integrated resource plans ("IRPs"), the Commission, intervenors in Commission proceedings, and the public "lack transparency into the utilities' internal resource plans."[47] As Mr. Nelson further testified:

> An IRP is a public planning process. It is an opportunity for the utility to explain its planning and operations to the public, interested stakeholders, and the Commission. Most of the key issues that have percolated into [the contested case arising from the present dockets] would be addressed in an IRP. For example, in an IRP, a utility could test the robustness of various supply- and demand-side resource portfolios against various design days or price spikes. [...] Other topics that would be discussed in an IRP include the value of demand-side resource towards meeting design day conditions, the costs and benefits of various supply basins, and capacity options for meeting load growth, such as additional pipeline capacity, storage, or peaking facilities.
>
> An IRP won't prevent another price spike, but robust, public planning puts the utility, the Commission, and community into a better position to mitigate the impact to customers of those price spikes.

CUB strongly agrees with the points Mr. Nelson raised in this testimony.

CenterPoint and MERC argue that IRPs would take significant time and resources to develop and would be unlikely to reduce exposure to gas price volatility in the near-term.[48] Both utilities also suggest that an IRP could be considered as a potential option under the Commission's broader evaluation of regulatory and policy changes needed to meet state emissions reduction goals under the docket established by the Natural Gas Innovation Act (G-999/CI-21-565, the "Future of Gas docket").[49] CenterPoint argues further that: (1) very few jurisdictions use IRPs for natural gas planning, (2) "[s]ignificant differences between the gas and electric utility industries limit the applicability of the well-developed electric utility IRP process to natural gas utility planning,"[50] and (3) "[i]n many ways, the Company's annual Gas Procurement Plan operates similarly to an IRP."[51]

[47] Nelson Direct at 42.
[48] MERC Comments at 10; CenterPoint Comments at 23.
[49] CenterPoint Comments at 23-24; MERC Comments at 10-11.
[50] CenterPoint Comments at 23.
[51] CenterPoint Comments at 22.

Xcel similarly points to several dockets addressing gas policy questions (Future of Gas, Natural Gas Innovation Act, Energy Conservation and Optimization Act, and other proceedings).[52] Xcel also highlights the resource planning-related information available through the Contract Demand Entitlements filing, while acknowledging that this filing "does not contain all of the information commonly contained in a resource plan, like conservation programs, demand side resources and a longer-term look at the Company's expected demand and supply." Because "[t]hese components…will be informed by the policy dockets and discussions the Commission is about to undertake in this docket," Xcel "recommends that a broader discussion about integrated resource planning be move [sic] to one of the other policy dockets for further development."[53]

Finally, MERC's comments appear to indicate a misunderstanding of the purpose of an IRP. MERC writes:

> Gas supply procurement decisions generally must be made on a very short timeframe, with contracts awarded within a matter of minutes to days of bids being received in order to lock in offered pricing and other terms. Market volatility and changes in market product offerings also makes long-term planning for natural gas commodity difficult.[54]

We disagree with several aspects of the Gas Utilities comments on gas IRPs. First, although some elements of an IRP are captured in other dockets, these dockets do not capture the full IRP process, nor the full value that an IRP can provide. Indeed, the fact that elements of gas utility planning are included in so many different dockets underscores the need to ensure that planning is thorough and is consistent across proceedings. Second, an IRP is concerned with the long-term decision making of the utility, not its day-to-day operations. An IRP focuses on assessing costs and risks of various portfolios of resources under numerous environments. It is less focused on specific contracts and more on the costs and risks of various supply basins, transportation pipelines, and physical and financial hedging strategies. In contrast, the utilities' planning currently occurs throughout various dockets (including the Contract Demand Entitlements Filings) which focus only on short-term needs, or internally at each company. Third, though Xcel asserts that few jurisdictions require gas IRPs, such a requirement is not unprecedented. As discussed below, long-standing gas IRP requirements that exist in at least three U.S. states could serve as a model for how such a requirement could be adopted in Minnesota.

Considering the uncertainty about the future, including the potential for extreme weather events, an IRP allows stakeholders to test a range of futures to better understand the relative value of a resource portfolio. Each scenario in an IRP includes various assumptions about future circumstances that are not under the utility's control, such as fuel prices, demand, technology costs, and policy changes. Typically, a utility will conduct a range of sensitivities. Each sensitivity represents a variation of the base scenario in which a single assumption or variable is modified to quantify the importance of that assumption. An IRP thus not only serves as a long-term planning tool but as a centralized process for documenting a utility's assumptions.

An IRP would help inform which resource, or resources, would best serve the needs of the utility to meet future energy needs. For example, the Gas Utilities in this docket have acknowledged that

[52] Xcel Comments at 23.
[53] Xcel Comments at 25.
[54] Merc Comments at 10-11.

increasing storage options will require the "expansion of storage and pipeline facilities at significant cost."[55] Evaluating whether long-term, cost intensive additions of storage or other resources are reasonable necessitates an IRP process that identifies and assesses the needs of the gas system. An IRP could also help the utility identify which future portfolio of resources minimizes the risk of extreme pricing events. Through the IRP, the utility must develop inputs, assumptions, and methodologies on its future load forecast, future climate, energy prices, cost of demand- and supply-side resources, and expected environmental policy. The Commission, stakeholders, and the utility can then review, contest, and/or use the IRP's analysis to enhance the record of other proceedings. For example, a major component of the IRP is the utility's load forecast, which is also a critical input in a utility rate case and other proceedings. Through an IRP, the utility must justify its methodology and data and provide stakeholders with an opportunity to suggest improvements or present alternative data. The IRP will also include load sensitivities that identify the costs and risks to the utility if the load deviates from the utility's assumption. This type of information will help inform the Commission decision-making during proceedings such as a prudence determination. It would also inform some of the considerations under discussion in the present docket, such as whether new investments in storage or peaking facilities are warranted.

CUB recommends that the Commission (1) require Minnesota's natural gas utilities to file integrated resource plans and (2) open a new docket seeking input on the procedure and content of in those plans. In its order in the instant comment period, the Commission should establish a deadline for utility filings proposing the process, timeline, and content of a natural gas IRP. The Commission should provide the utilities and stakeholders opportunities for comments and reply comments on these proposals, then issue an order setting the timeline, process, and requirements for gas IRPs. CUB recommends that this docket be separate from the Future of Gas docket, which addresses too many other important issues to provide dedicated time and space for a nuanced and action-oriented conversation on this important issue.

ii. *Proposed components of a Gas IRP*

Although CUB believes a separate comment period is needed to fully address the content of an IRP, we want to take this opportunity to identify common components of a gas IRP. It may be helpful to examine the IRP process in states that require natural gas resource plans. The Pacific Northwest states of Washington, Oregon, and Idaho have had natural gas IRPs for more than 20 years.[56] Like their electric counterparts, the natural gas utilities typically file IRPs every two years. Although the IRP is shaped by the individual utility and its planning environment, the content of the IRPs across the utilities are largely aligned. Figure 2, below, is from the Oregon-based Northwest Natural Gas Company's 2018 Integrated Resource Plan and describes the utility's planning process.[57] We think that this figure is illustrative of the key components of an IRP. After walking through each of the core steps, we will discuss additional components of an IRP that the Commission may wish to adopt.

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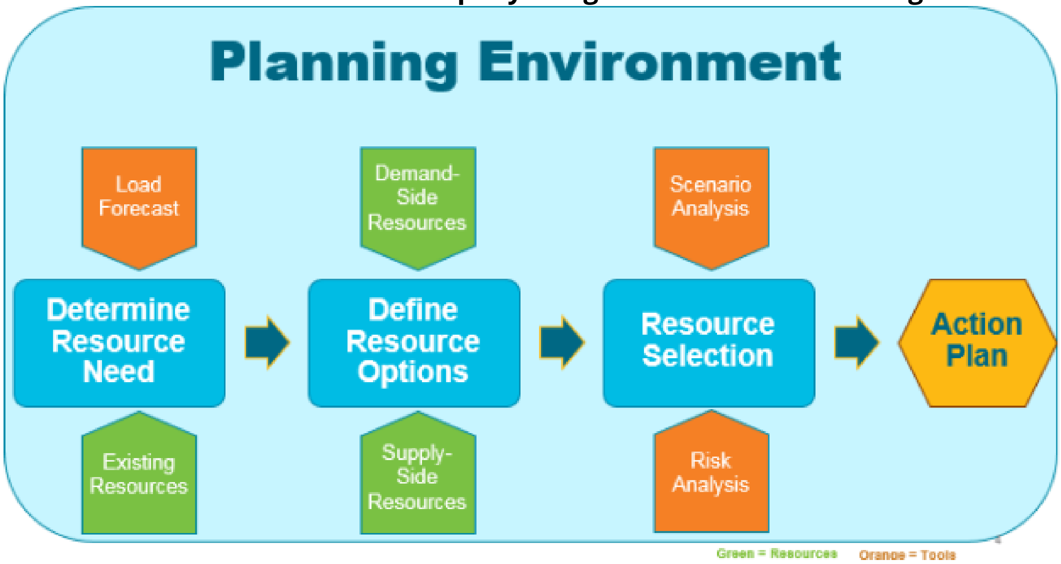
[55] CenterPoint Comments at 16.

[56] Avista Natural Gas IRP is available at https://www.myavista.com/about-us/integrated-resource-planning; Cascade Natural Gas IRP is available at https://www.cngc.com/rates-services/rates-tariffs/washington-integrated-resource-plan/, Northwest Natural Gas IRP is available at https://www.nwnatural.com/about-us/rates-and-regulations/resource-planning, and Puget Sound Energy Gas IRP is available at https://www.pse.com/IRP.

[57] *See* NW Natural 2018 Integrated Resource Plan, Executive Summary at 1.2 (2018).

Figure 2: Northwest Natural Gas Company Integrated Resource Planning Process



Northwest Natural Gas begins its IRP by describing its planning environment, including economic outlooks, current and future environmental policies, and the state of the energy markets. In this section, the utility discusses the risks and uncertainties it faces as it is developing its portfolio of resources, assessing the impacts of environmental policy and market forces. For example, a utility may seek to answer questions such as: "Are Minnesota, the federal government, or other states passing energy legislation that will either increase/decrease the price of conventional gas or create a new market for alternative fuels? What is required from Minnesota's natural gas sector to comply with state or federal greenhouse gas laws and regulations? Is there a general economic trend, such as rising inflation and interest rates, that may indicate a looming change in the economic situation? If yes, how could that impact the utility and its customers' demand?" The assessment of the utility's planning environment is important for contextualizing the utility's inputs and assumptions used throughout the IRP.

The utility then determines its resources over the planning horizon by analyzing the ability of its existing resource portfolio to meet its load forecast needs. During this initial stage, the utility and stakeholders closely examine the utility's load forecast assumptions and methodology over the planning horizon. Key components include the load and customer forecast, use-per-customer by class assumptions, and the utility's planning standard (e.g., peak day forecast energy planning standard and capacity planning standard).

In the second step, the utility examines the commercially available demand- and supply-side resources. The utility transparently displays and discusses its assumptions about the cost, feasibility, and value of each resource, including energy efficiency measures. For some resources, such as energy efficiency or peak shaving facilities, the utility may have significant control over the timing and placement of the resource. For other resources, such as new inter-state transportation pipelines, the utility may not have significant control over the project. This section of the IRP provides quantitative and qualitative analysis of the utility's role and relative control over each resource.

The third step is the utility's scenario and sensitivity analysis. As neither the utility nor anyone else has perfect foresight, the utility must use scenario and sensitivity analysis to test a range of futures. In the case of Northwest Natural, the utility uses SENDOUT for its upstream analysis[58] and Synergi Gas™ for its distribution system planning[59] as its two most important planning tools. The utility will typically model a range of scenarios and sensitivities to identify least-cost, least-risk portfolios under various futures. For example, a natural gas utility can test the trade-off of various resources to reduce costs to customers during certain events, like price spikes or extreme weather events. Alternatively, the utility can identify the least-cost, least-risk portfolios if load growth or natural gas prices are greater, or less than, anticipated, and identify which resources are consistently chosen across the futures. Unlike vertically integrated utilities which typically have significant control over all the resources in its portfolio, a natural gas utility often has less control over new transportation pipelines. Scenario analysis can help identify the optimal portfolio of resources based on these uncertainties and help identify risk mitigation strategies.

In the final step, the utility should identify its near-term (i.e., five year) action plan of the specific steps that it will take to ensure that it is meeting customers' energy needs and complying with Commission and state policy at the lowest reasonable cost.

There are additional components of an IRP, in addition to the basic components identified above, that the Commission can also request the utility to conduct. These include:

- An avoided cost estimate and explanation that details the value streams of the avoided cost (e.g., avoided energy, avoided capacity, avoided emissions, non-energy benefits, etc.).
- Distribution system analysis that identifies key segments of the distribution system that will need to be upgraded in the near future. This is important analysis for identifying non-pipeline alternatives that can be used for delaying, deferring, or reducing planned distribution pipe upgrades.
- A public process is key to any successful IRP. One way to ensure that the utility is responsive to its stakeholders is to require the utility to include a summary of stakeholder feedback and the utility's response to that feedback.

In summary, we propose that the contents of a gas IRP should include the following:

I. Discussion of planning environment
    a. Economic and demographic conditions
    b. Environmental policy
    c. New technologies
II. Load forecast
    a. Customer forecast by class
    b. Use-per-customer by class
    c. Planning standard
        i. Peak day forecast
        ii. Energy planning standard

[58] *See* NW Natural 2018 Integrated Resource Plan at 1.2 (2018).
[59] *Id*. at 8.2.

iii. Capacity planning standard

d. Assessment of current portfolio to meet load forecast.

III. Assessment of commercially available demand-side resources

IV. Assessment of commercially available supply-side resources

V. Portfolio selection and analysis

a. Scenarios and sensitivities

VI. Action Plan

a. Identification of specific actions that utility will take (1-5 years) (e.g., how much demand- and supply-side resources are procured.

Other topics to include

VII. Avoided costs

VIII. Distribution system analysis

IX. Summary of public process

E. The Commission should not open a separate docket to assess the Gas Utilities hedging strategies without first considering whether a simpler risk-sharing mechanism is more likely to protect ratepayers in the event of future price spikes.

CenterPoint, Xcel and MERC have each noted they have made, and/or intend to consider, adjustments to their respective hedging plans to account for lessons learned during the February Event.[60] However, Xcel raises important policy considerations as to whether and what adjustments are cost effective. Xcel notes that, as gas prices have increased, its existing, approved, budget for hedging instruments covers less than it once did.[61] However, Xcel also notes that if it increases its hedging budget, that could cause hedging costs to increase for ratepayers. Xcel suggests that these public policy considerations warrant a separate, expedited regulatory process to obtain feedback from stakeholders and the Commission.

While we appreciate and share Xcel's concerns about the policy matters and financial implications of revising its hedging strategy, we are hesitant to support an additional regulatory proceeding to address these issues. First, we believe there are more concrete steps the Commission and Gas Utilities could and should take to implement risk-sharing mechanisms (as discussed above) that incent utilities to ensure their gas purchasing decisions are as cost-effective as possible. We would prefer to see those strategies implemented before the Commission engages in a complex regulatory review of financial hedging strategies.

That said, if the Commission believes a deeper review of the Gas Utilities' hedging strategies is warranted, we are doubtful that a separate, expedited proceeding on hedging will be productive unless non-utility parties are able to engage experts in financial hedging to more meaningfully participate. CUB lacks this expertise internally, though we are evaluating whether we can engage an expert to assist us in that process, should it occur. We understand the Department, Office of the Attorney General and other organizations may have internal experts that can assist in building a

[60] See, e.g., CenterPoint Comments at 21; MERC Comments at 5; Xcel Comments at 10.
[61] Xcel Comments at 10.

record in such a proceeding. That said, if the Commission is moving towards opening a separate proceeding to address hedging, we recommend that the Commission authorize the Department to engage an outside expert for this purpose.

III. CONCLUSION

We appreciate the Commission's consideration of these comments. In summary, CUB proposes the following recommendations:

1. The Commission should prioritize solutions that do not require new, long-term investments.

2. The Commission should reject the objective economic trigger proposed in the Joint Utilities' filing as a means of determining when it is appropriate to utilize curtailments, peak-shaving resources, and storage to address future price spikes.

    a. The Commission should create an economic threshold that triggers a filing and review of utility actions to determine prudence during a pricing event.

    b. The Commission should order each of the Gas Utilities to develop two interruptible tariffs—one tariff focused on economic curtailments and the other focused on reliability curtailments—for inclusion in each Gas Utility's next rate case.

    c. The Commission should direct each Gas Utility that currently owns peaking facilities (Xcel and CenterPoint) to refile in these dockets more dynamic proposals that recognize that calling on peaking resources depends on the economic and situational context of the utility and the market.

3. The Commission should order the Gas Utilities to work with stakeholders to propose in their September 2023 AAA filings a risk-sharing mechanism that would incentivize utilities to minimize exposure to future gas price spikes.

4. The Commission should require Minnesota's natural gas utilities to file integrated resource plans and should open a new docket seeking input on the procedure and content of those plans.

5. The Commission should not open a separate docket to assess the Gas Utilities' hedging strategies without first considering whether a simpler risk-sharing mechanism is more likely to protect ratepayers in the event of future price spikes. If the Commission does open a separate docket to assess the Gas Utilities' hedging strategies, it should authorize the Department to engage an outside expert to help build the record in that docket.

Sincerely, October 14, 2022

/s/ Annie Levenson-Falk
Annie Levenson-Falk
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cc: Service Lists

Citizens Utility Board of Minnesota
Information Requests

Date of Request: September 30, 2022

Requested By: Brian Edstrom
briane@cubminnesota.org

Requested From: Joint Utilities

Request Due: October 12, 2022

February 2021 Natural Gas Price Investigation **Docket No. 21-135**

Where applicable, provide your answers in a live, unlocked spreadsheet with all links and formula intact. If the calculations or data origins are not obvious/labeled, provide a narrative explanation.

Reference the September 15, 2022 Comments filed by the Joint Utilities in Docket No. 21-135:

1. As stated in the Joint Utilities' Comments, the economic trigger would take effect when gas daily index prices are "greater than or equal to $50.00 per Dth" <u>and</u> are "greater than or equal to five times the weighted average cost of gas forecast for the month at issue in the utility's filed PGA for that month" (Joint Utilities' Comments at 3). Please explain how the Joint Utilities arrived at the specific economic trigger and why it is reasonable.

2. Did the Joint Utilities consider any other specific economic trigger thresholds (other than that identified in Question 1)? If yes, please describe the threshold and explain why the Joint Utilities did not adopt that proposal. If no, please explain this answer too.

<u>Joint Utilities Response</u>

1. The proposed economic trigger was selected to address the Commission's directive to "develop a plan to improve or modify its practices to protect ratepayers from extraordinary natural gas price spikes in the future." The economic trigger is intended to be responsive to the Commission's directive while also recognizing the need to have resources such as storage, peak shaving, and interruptible curtailments available to ensure continuous and reliable service to customers. By planning to dispatch resources in advance of a gas day in response to high natural gas prices, those tools will not be available to respond to distribution issues, interstate pipeline constraints, or supply cuts that may arise over the course of the gas day. As a result, the relatively high economic trigger thresholds were selected, also recognizing the price-based triggers represent an operational approach that has not been taken before, and recognizing the current market environment, including the dramatic increase in market prices for natural gas.

2. The Joint Utilities also considered that the Commission, in Docket No. G999/CI-21-135, found it reasonable for purposes of evaluating the February 2021 gas cost recovery, to define extraordinary costs as recommended by the Department as the margin between $20/Dth and the actual average price experienced by the utilities during the February Event. *See* Docket No. G999/CI-21-135 et al. Order Granting Variances and Authorizing Modified Cost Recovery Subject to Prudence Review, and Notice of and Order for Hearing at 11-12 (Aug. 30, 2021). However, as

discussed above, the Joint Utilities concluded that a $50/Dth trigger along with the five times the weighted average cost of gas trigger provided an appropriate definition to be used for future extraordinary price spike events in light of current natural gas market conditions and the need to balance the use of available resources to reliably meet customer needs with the mitigation of price spike impacts.

State of Minnesota
Citizens Utility Board of Minnesota

Utility Information Request

Docket Number: G-999/CI-21-135 - Gas Costs Investigation   Date of Request: 9/30/2022
Requested From: CenterPoint Energy Minnesota Gas   Response Due: 10/12/2022

Analyst Requesting Information: Brian Edstrom

Type of Inquiry: Other

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
CUB-01 (2022)	Where applicable, provide your answers in a live, unlocked spreadsheet with all links and formula intact. If the calculations or data origins are not obvious/labeled, provide a narrative explanation. Reference the September 15, 2022 comments filed made by the Joint Utilities, Xcel, and CenterPoint in Docket No. 21-135: According to Xcel's filing, "interruptible customers do not pay for the Company's peaking plants." (Xcel 9/15/2022 filing at 17). Please confirm whether this is also true for CenterPoint's interruptible customers. **Response:** No. Plant and operations and maintenance ("O&M") costs related to CenterPoint Energy's ("CenterPoint Energy" or "Company") peak shaving facilities are allocated in the Company's Class Cost of Service Study ("CCOSS") used in the design of base rates. As discussed in the Direct Testimony of Mr. Ralph Zarumba in Docket No. G008/GR-21-435, CenterPoint Energy's production cost of service is associated with facilities that operate as peaking resources to meet the Company's peak demand requirements. Therefore, the cost of these facilities and related O&M expenses are allocated to rate classes using a design day demand allocation method (the Relative Demand Assessment ("RDA")). Using this approach, costs are allocated to both firm and interruptible customer classes.

Response By: Seth DeMerritt
Title: Manager, Regulatory & Rates
Department: Regulatory Portfolio Management MN
Telephone: 612-321-4423

State of Minnesota
Citizens Utility Board of Minnesota

Utility Information Request

Docket Number: G-999/CI-21-135 - Gas Costs Investigation Date of Request: 9/30/2022
Requested From: CenterPoint Energy Minnesota Gas Response Due: 10/12/2022

Analyst Requesting Information: Brian Edstrom

Type of Inquiry: Other

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
CUB-02 (2022)	Where applicable, provide your answers in a live, unlocked spreadsheet with all links and formula intact. If the calculations or data origins are not obvious/labeled, provide a narrative explanation. Reference the September 15, 2022 comments filed made by the Joint Utilities, Xcel, and CenterPoint in Docket No. 21-135: Xcel has proposed to dispatch up to 100% of its maximum deliverable LNG capacity (156,000 Dth/day) in response to high natural gas prices. CenterPoint has proposed plans to dispatch only 25% (18,000 Dth/day) of the Company's total LNG capacity in response to high natural gas prices. Please explain how the Company chose this number. Why is the Company's more conservative approach (compared to Xcel) reasonable? **Response:** CenterPoint Energy's ("CenterPoint Energy" or "Company") proposal provides a reasonable balance between using LNG to potentially mitigate the impacts of future extraordinary gas price spikes and maintaining the Company's limited LNG capacity and inventory to ensure we are able to address reliability and meet design day customer requirements. The Company does not believe it would be reasonable to plan to fully dispatch 100% of LNG capacity in response to a price spike because such action would leave the Company no LNG capacity remaining to manage issues such as loss of supply or a large change in weather from forecast. Based on consideration of the potential duration of a price spike event, the probability that such event could coincide with cold weather, and the fact that dispatch of LNG in response to price is a change in the Company's prior practice and therefore, untested,

Response By: John Heer
Title: Director, Storage & Supply Planning
Department: Gas Control & Peak Shaving
Telephone: 612-321-4345

CenterPoint Energy concluded that planning to dispatch up to 25% of its LNG capability in response to the proposed price triggers appropriately balances our ability to reliably meet customer needs with the mitigation of price spike impacts.

Notably, CenterPoint Energy has proposed a number of potential modifications related to its use of peak shaving to respond to natural gas prices. The modification referenced in this request is the Company's proposal for implementation upon Minnesota Public Utilities Commission ("Commission") order, potentially as soon as the upcoming heating season. The Company also outlined further modifications that could be implemented beyond the upcoming heating season to potentially provide for greater dispatch of LNG in response to natural gas pricing.

Upon Commission order, CenterPoint Energy would begin planning for economic dispatch of a portion of daily LNG capacity during the upcoming heating season. More specifically, if directed by the Commission, the Company has proposed to plan for the dispatch of up to 25 percent (18,000 Dth/day) of the total daily LNG capacity beginning after January 20 if the two-prong price trigger occurs. CenterPoint Energy is proposing to apply this price-based trigger after January 20 to ensure that peak shaving supplies are available to meet customer requirements through December and the early part of January, when design day weather is statistically more likely to occur with greater frequency.

Beyond the upcoming heating season, CenterPoint Energy is evaluating potential upgrades to the LNG plant's liquefaction system to allow for reliable liquefaction and refilling of storage through the winter months. These upgrades could be undertaken in 2023 to potentially be available for the 2023-2024 heating season and would provide the ability to replace some stored LNG as it is used over the course of the winter. Allowing for refill of the LNG storage throughout the winter would help to mitigate the risk of utilizing some LNG supplies to respond to pricing events because the Company would be able to add to storage to improve availability later in the season. It is important to keep in mind, however, that the rate of liquefaction is limited to 5,000 Dth/day, meaning it takes over two weeks to replace a single day of LNG dispatch at full capacity. Running liquefaction in the winter months would also reduce the daily output capacity.

CenterPoint Energy is also studying the feasibility of upgrading its LNG system to increase output to help meet expected additional customer peak demand beginning in 2025. Currently, the LNG facility is rated at a vaporization output of 72,000 Dth/day. Preliminary engineering analysis shows that the vaporization output of the LNG plant could be increased to 90,000 Dth/day with the addition of pump capability and replacement of the LNG vaporizers and supporting equipment. Evaluation of these potential upgrades is ongoing.

Xcel proposed the following with respect to its use of peak shaving in response to price:

> Starting at the beginning of the 2023-2024 heating season, the Company expects to use LNG stored in its Wescott facility in situations where the price of gas reaches extraordinary levels, like they did over Presidents Day weekend, *while maintaining sufficient inventory to meet Design Day and operational requirements*. The Company proposes to operate Wescott, *up to* its maximum deliverable capacity (i.e., 156,000 Dth/day), *within the sole discretion of the Company* when the following triggers, proposed by the Gas Utilities in their September 15, 2022 filing, have been met. (Emphasis added.)

Importantly, Xcel's proposal, like CenterPoint Energy's, appears to be structured to ensure peak shaving is maintained to meet design day and operational requirements. Xcel has proposed to retain discretion to ensure any amounts dispatched in response to the price trigger appropriately balance the need to retain inventory to ensure reliability. CenterPoint Energy's proposal also appropriately accounts for the need to ensure peak shaving availability to address design day, reliability, and operational requirements by initially – during the upcoming heating season, before additional upgrades can be completed – planning for only a portion of daily LNG capacity to be used to respond to prices after the coldest part of the heating season has passed.

As detailed in Xcel's filing, "use of the facility for economic dispatch in the event the triggers have been met will depend on the level of LNG inventory at the time of the event... . The Company will, first and foremost, maintain inventory levels that support the system during a design day event or other operational needs." Xcel also notes that the "[t] iming of any potential price mitigation event will be a key factor in the decision to dispatch the plant for price mitigation purposes... . As we move through the winter season, the probabilities of such [reliability] events change and may free more inventory for price mitigation."

Xcel's proposal appears to be consistent with CenterPoint Energy's short term proposal to dispatch a portion of its LNG capacity (while reserving some LNG to meet operational and reliability needs) after the highest risk of design day weather conditions has passed (i.e., after January 20). The Company's short term proposal to dispatch up to 25 percent of daily LNG capacity in response to the price trigger is reasonable because this appropriately balances providing some level of price mitigation (subject to the limitations described in detail in the Company's filing) with ensuring the preservation of peak shaving to address reliability and operational needs.

As noted above, CenterPoint Energy's LNG plant is rated at a vaporization output of 72,000 Dth/day, which is the maximum amount of LNG that can be dispatched over the course of a 24-hour gas day. To contextualize the daily capacity of the LNG plant, an average daily temperature drop of five degrees from forecast would result in an increase to customer load requirements of more than the maximum daily capacity of the LNG plant. Committing to dispatch this peaking resource on a planned basis to reduce spot gas purchases reduces the volumes that are available during the gas day to address short-term needs, meaning those supplies are no longer available to respond to distribution issues, interstate pipeline constraints, or supply cuts that arise during the gas day, and could result in the loss of service to our system.

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STATE OF MINNESOTA
BEFORE THE PUBLIC UTILITIES COMMISSION

In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers	MPUC Docket No. G-999/CI-21-135
In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions	MPUC Docket No. G008/M-21-138
In the Matter of the Petition by Great Plains Natural Gas Co., a Division of Montana-Dakota Utilities Co., for Approval of Rule Variances to Recover High Natural Gas Costs from February 2021	MPUC Docket No. G004/M-21-235
In the Matter of a Petition of Northern States Power Company d/b/a Xcel Energy to Recover February 2021 Natural Gas Costs	MPUC Docket No. G002/CI-21-610
In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions	MPUC Docket No. G011/CI-21-611

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CERTIFICATE OF SERVICE

I, Brian Edstrom, hereby certify that I have served a true and correct copy of the following documents to all persons at the addresses indicated on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

1. Initial Comments of the Citizens Utility Board of Minnesota

Dated this 14th day of October, 2022.

/s/ Brian Edstrom
Brian Edstrom
Senior Regulatory Advocate
Citizens Utility Board of Minnesota
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cc: Service Lists:
G-999/CI-21-135
G008/M-21-138
G004/M-21-235
G002/CI-21-610
G011/CI-21-611

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