



CITIZENS UTILITY BOARD

Empowering Minnesota Consumers

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December 7, 2022

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

VIA ELECTRONIC FILING

Re: *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.: G-008/M-21-138**

***In the Matter of the Petition by Great Plains Natural Gas Co. for Approval of Rule Variances to Recover High Natural Gas Costs from February 2021*, MPUC Docket No.: G-004/M-21-235**

***In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy to Recover February 2021 Natural Gas Costs*, MPUC Docket No. G-002/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. G-011/CI-21-611**

Dear Mr. Seuffert:

CUB offers the following alternate decision options for consideration during Agenda Item 4 of the December 8, 2022 Commission Hearing. Specifically, we propose a new Decision Option, 2A, and modifications to existing Decision Option 11 included in the briefing papers. These decision options reflect recommendations CUB included in the comments we filed on October 14, 2022 in these dockets.

CUB Decision Alternatives

2A. Order each Gas Utility to, within sixty days following the occurrence of the below triggering event, make a notice filing to the Commission identifying its costs for procuring gas for Minnesota customers while gas prices were inflated, what actions the utility took to account for or mitigate those costs, and justifications for why its actions were prudent.

Notice filing triggering event

The gas day (or multiple days in the case of weekends and holidays) settled Gas Daily index price at any pricing hub where the utility purchased daily supplies to serve its Minnesota customers is greater than or equal to \$20.00 per Dth. (CUB)

11. Order Gas Utilities to ~~explore the development of~~ develop for inclusion in their next rate case new interruptible service offerings that are designed to allow for a reasonable degree of economic curtailments in future heating seasons. (DOC, CUB)

Sincerely,

/s/ Brian Edstrom

Brian Edstrom

Senior Regulatory Advocate

Citizens Utility Board of Minnesota

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cc: Service Lists