



February 28, 2020

## -VIA ELECTRONIC FILING-

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

RE: PETITION AND COMPLIANCE FILING STATE ENERGY POLICY RIDER DOCKET NO. G002/M-20-\_\_\_\_

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Petition for approval of an updated natural gas State Energy Policy (SEP) Rider rate factor and the annual SEP compliance filing.

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document, and served copies on the parties on the attached service lists.

If you have any questions regarding this filing please contact Martha Hoschmiller at martha.e.hoschmiller@xcelenergy.com or (612) 330-5973, or me at (612) 330-7681 or lisa.r.peterson@xcelenergy.com.

Sincerely,

/s/

LISA R. PETERSON MANAGER, REGULATORY ANALYSIS

Enclosures

c: Service List

# STATE OF MINNESOTA BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie Sieben Chair Valerie Means Commissioner Matthew Schuerger Commissioner John Tuma Commissioner

IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY FOR APPROVAL OF A MODIFICATION TO OUR NATURAL GAS SEP TARIFF, UPDATED SEP RATE FACTOR, AND SEP COMPLIANCE FILING DOCKET NO. G002/M-20-\_\_\_

PETITION AND COMPLIANCE FILING

## **OVERVIEW**

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Petition requesting approval of an updated natural gas State Energy Policy (SEP) Rider rate factor, our Annual SEP compliance filing, and our proposed customer notice and tariff update.

We submit this report pursuant to the Commission's April 6, 2004 Order in Docket No. E,G002/M-03-1544, which established the SEP Rider and requires the Company to submit an annual SEP compliance report on March 1 of each year. The Commission's more recent August 24, 2017 Order in Docket No. G002/M-17-174 reiterated the requirement to file an annual SEP compliance report on March 1.

We propose to decrease the natural gas SEP Rider rate factor to \$0.000943 per therm to recover approximately \$0.9 million net revenue requirements for the 12-month period of July 2019 – June 2020. If approved as proposed, average natural gas residential customers using 70.33 therms per month would pay approximately \$0.80 per year, compared to \$0.99 under the current rate.

We submit this filing in accordance with the following statutory and rule provisions:

- Minn. Stat. § 216B.16, Subd. 1 (Rate Change Notice)
- Minn. Stat. § 216B.62, Subd. 3b. (Assessment for Department Regional and National Duties)
- Minn. R. 7829.1300 (Miscellaneous Tariff Filings)

• Minn. R. 7829.0100 (Definitions)

## I. SUMMARY OF FILING

Pursuant to Minn. R. 7829.1300, subp. 1, a one-paragraph summary of the filing accompanies this Petition.

## II. SERVICE ON OTHER PARTIES

Pursuant to Minn. R. 7829.1300, subp. 2, Xcel Energy has served a summary of the filing on all parties on the Xcel Energy miscellaneous natural gas service list and the service list from our 2019 SEP Rider filing.<sup>1</sup>

#### III. GENERAL FILING INFORMATION

Pursuant to Minn. R. 7829.1300, subp. 3, the Company provides the following information.

## A. Name, Address, and Telephone Number of Utility

Northern States Power Company, doing business as Xcel Energy 414 Nicollet Mall Minneapolis, MN 55401 (612) 330-5500

## B. Name, Address, and Telephone Number of Utility Attorney

Mara K. Ascheman Senior Attorney Xcel Energy Services Inc. 414 Nicollet Mall, 401 - 8<sup>th</sup> Floor Minneapolis, MN 55401 (612) 215-4605

## C. Date of Filing and Proposed Effective Date of Rates

The date of this filing is February 28, 2020. The Company proposes the updated natural gas SEP Rider rate factor be included in the Resource Adjustment line on the Company's retail natural gas billing rates effective July 1, 2020, after the conclusion of

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<sup>&</sup>lt;sup>1</sup> Docket No. G002/M-19-200

the July 1, 2019-June 30, 2020 SEP test period in compliance with Order Point No. 4 of the Commission's December 21, 2018 Order in Docket No. G002/M-18-184.

## D. Statutes Controlling Schedule for Processing the Filing

This filing falls within the definition of a "Miscellaneous Filing" under Minn. R. 7829.0100, subp. 11, because no determination of Xcel Energy's general revenue requirement is necessary. Pursuant to Minn. R. 7829.1400, initial comments on a miscellaneous filing are due within 30 days of filing, with replies due 10 days thereafter.

## E. Utility Employee Responsible for Filing

Lisa R. Peterson Manager, Regulatory Analysis Xcel Energy Services Inc. 414 Nicollet Mall, 401 - 7<sup>th</sup> Floor Minneapolis, Minnesota 55401 (612) 330-7681

## IV. MISCELLANEOUS INFORMATION

Pursuant to Minn. R. 7829.0700, subp. 2, Xcel Energy requests that the following persons be placed on the Commission's official service list for this matter:

Mara K. Ascheman

Lynnette Sweet

Regulatory Administrator

Xcel Energy

414 Nicollet Mall, 401 - 8<sup>th</sup> Floor

Minneapolis, Minnesota 55401

mara.k.ascheman@xcelenergy.com

Lynnette Sweet

Regulatory Administrator

Xcel Energy

414 Nicollet Mall, 401 - 7<sup>th</sup> Floor

Minneapolis, Minnesota 55401

regulatory.records@xcelenergy.com

Any information requests in this proceeding should be submitted to Ms. Sweet at the Regulatory Records email address above.

## V. DESCRIPTION AND PURPOSE OF FILING

## A. Background

The Commission first established the SEP Rider mechanism and approved recovery of eligible expenses in its April 6, 2004 Order in Docket No. E,G002/M-03-1544. Since that time, electric SEP expenses have moved into base rates. There are two

types of natural gas-related expenses currently authorized for recovery in the SEP Rider per Minnesota statutes and Commission Orders: Assessment for Department Regional and National Duties (ADRND) and Cast Iron Pipe Replacement Project expenses (also referred to as Greenhouse Gas Infrastructure costs). These two expense types are discussed in detail below. As described below, the Cast Iron Pipe Replacement Project expenses relate to a capital project that was completed several years ago. Accordingly, no new costs (only the continued recovery of the revenue requirements for the existing project and modest costs related to ADRND) are proposed to be recovered through the SEP Rider, per the Commission's August 24, 2017 Order in Docket No. G002/M-17-174.

The Commission's August 24, 2017 Order requires the Company's annual March 1 compliance filing to contain:

- the actual and forecasted information needed to determine any true-up amount to be recovered from or returned to ratepayers as a result of the operation of the SEP Rider;
- amounts anticipated to be incurred and including any true-up amounts for the operation of the SEP Rider during the current year; and
- a comparison between actual and budgeted monthly costs in its future SEP Rider filings, including a discussion of reasons for deviations from budgeted amounts (both higher and lower).

The following attachments meet the specified requirements:

Attachment	Description
Attachment A1	Proposed revision to the tariff sheet.
Attachment A2	Our SEP projected net revenue requirements for the 12 month period July
	2019 through June 2020 and rate factor applicable to all natural gas
	customers, including demand billed Commercial and Industrial customers,
	under this rider.
Attachment B	SEP Tracker
Attachment C	A comparison by month for the past twelve months of actual natural gas
	revenue requirements and revenue collections versus forecasted revenue
	requirements and revenue collections.
Attachment D1	Detailed Assessment for Department Regional and National Duties expenses.
Attachment D2	Detailed Cast Iron Pipe Replacement Project revenue requirements.
Attachment D3	Cast Iron Pipe Replacement Project O&M credit.
Attachment D4	Revenue collections (Actual and Forecast).
Attachment E	Base assumptions used to calculate the cast iron pipe revenue requirements.
Attachment F	Bridge Schedule from our most recent natural gas rate case, reflecting the
	2010 test year, as filed.
Attachment G	Description of revenue requirements categories.
Attachment H	Summary report to the EPA on Greenhouse Gas Emissions

## B. SEP Eligible Expenses

The Commission's August 24, 2017 Order<sup>2</sup> allowed the Company to continue to recover two types of expenses through the natural gas SEP Rider: Assessment for Department Regional and National Duties and Cast Iron Pipe Replacement Project expenses. These expense types are discussed below.

## 1. Assessment for Department Regional and National Duties (ADRND)

ADRND costs are related to the expenses incurred by the Minnesota Department of Commerce, Division of Energy Resources, for services to the Commission and the public on reliability issues and other proceedings, analyses, or projects.

The April 6, 2004 Order approved recovery of Reliability Administrator (RA) expenses through the SEP Rider. The original statute authorizing the Reliability Administrator (Minn. Stat. § 216C.052, Subd. 2) was repealed by 2011 Minn. Laws Ch. 97 § 34. In the same legislative session, Minn. Stat. § 216B.62, Subd. 3b. was passed, authorizing the ADRND through June 30, 2015. The 2017 legislative session extended the ADRND through June 30, 2018. The 2019 legislative session extended the ADRND through June 30, 2021. ADRND expenses are shown in Attachment D1.

## 2. Cast Iron Pipe Replacement Project

The Commission first approved recovery of the Cast Iron Pipe Replacement Project costs through the SEP Rider under Minn. Stat. § 216B.1637 (Recovery of Certain Greenhouse Gas Infrastructure Costs) in its November 25, 2008 Order in Docket No. E,G002/M-08-261. After all of the Cast Iron Pipe Replacement Project costs were incurred, approved for rider recovery, and placed in-service, this statute was repealed. Currently the SEP Rider is recovering the revenue requirements for projects constructed and costs incurred before the statute was repealed in July 2013. Since the project is no longer incurring new costs, we anticipate proposing the remaining depreciation expenses for the project be moved into base rates at the time the Company next files a natural gas rate case.

The November 25, 2008 Order required that we credit through the SEP Rider any proceeds received from the sale of carbon offsets or credits associated with the Cast Iron Pipe Replacement Project. To date we have made no such sales.

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<sup>&</sup>lt;sup>2</sup> Docket No. G002/M-17-174

## VI. 2019-2020 SEP REVENUE REQUIREMENTS AND PROPOSED RATE FACTOR

Order Point No. 4 of the Commission's December 21, 2018 Order in Docket No. G002/M-18-184 requires the Company to file future SEP Rider filings using a historical test period. However, the SEP Rider is unique because nearly all of the costs relate to a completed capital project, and therefore the revenue requirement decreases annually as the project continues to depreciate. As a result, we have calculated the updated natural gas SEP rate factor based on the July 1, 2019-June 30, 2020 test period, and request that the updated rate factor not be effective until July 1, 2020 once the test period is complete. The net revenue requirement for the historic test period consists of three components, the project-specific revenue requirements, the projected under collection for the plan year, and the actual over-collection from the prior historical test period. The Company's proposal decreases the SEP rate factor compared to the current SEP Rider rate factor.

We provide an overview of the 2019-2020 SEP Rider revenue requirement calculations below. Attachment G provides additional descriptions of the SEP Rider revenue requirement categories.

In this Petition, we have updated the attachments we provide to better reflect the change to using a historical test period. On Attachment A2, the components that make up the net revenue to be collected are broken out between the ongoing revenue requirement of the projects and the amount of over/under collection that is included in the current rate being requested. On Attachment B, a separate calculation of the actual over/under collection for the prior test period is being provided along with a separate calculation of the test period revenue requirements and projected over- or under-collection for the test period. These attachment updates should provide greater transparency into the components that make up the net revenue requirement in the test period.

## A. Natural Gas SEP Rider Tracker Balance

Our proposed updated natural gas SEP Rider rate factor compared to the current rate factor approved in Docket No. G002/M-19-200 is as follows:

Table 1 Proposed Rate Factor												
	2018-2019	2019-2020										
Gas	Approved*	Proposed										
Revenue Requirement	\$1,385,679	\$1,328,831										
Projected Under/(Over) Collection	(\$118,742)	\$18,661										
Prior Year Actual Under/(Over) Collection	\$34,86 <u>3</u>	<u>(\$411,879)</u>										
Net Revenue Requirement	<b>\$1,301,800</b>	<u>\$935,613</u>										
Rate/Therm	\$0.001173	\$0.000943										

<sup>\*</sup>Revenue requirement restated to break out prior year under-collection (\$1,385,679 + 34,863 = \$1,420,542)

If approved as proposed, an average natural gas residential customer using 70.33 therms per month<sup>3</sup> would pay approximately \$0.80 per year, compared to \$0.99 currently, based on July 2020-June 2021 forecasted sales. We discuss the specific inputs to the natural gas rate factor calculations below.

A summary of 2019-2020 SEP Rider actual and forecasted costs proposed for recovery and the calculation of our proposed natural gas SEP Rider rate factor compared to the current rate are follows:

Table 2 SEP Costs and Rate Factor													
2018-2019 2019-2020													
Gas	Approved	Proposed**	Difference										
ADRND	\$7,089	\$26,931	\$19,842										
Cast Iron	\$1,450,900	\$1,374,210	\$(76,690)										
Cast Iron O&M Credit	(\$72,310)	(\$72,310)	-										
Test Period (Over)/Under	(\$118,742)	\$18,661	\$137,403										
Prior Year Actual (Over)/Under	\$34,863	<u>(\$411,879)</u>	<u>\$(446,742)</u>										
Revenue Requirement	\$1,301,800	\$935,613	\$(366,187)										
Therm Sales*	1,109,497,520	992,590,020	(116,907,500)										
Factor	\$0.001173	\$0.000943	\$(0.000231)										

<sup>\*</sup>The Sales Forecast information in Table 2 is annualized to provide a comparison of our projected factor and our approved factor.

The monthly breakdown of our natural gas SEP Rider costs, projected revenues, prior year actual over-collection, and current year projected under-collection is provided in

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<sup>\*\*</sup>The 2019-2020 proposed revenue requirement includes 6 months of actuals and 6 months of forecast.

<sup>&</sup>lt;sup>3</sup> 844 therms per year

Attachment B.<sup>4</sup> In addition, we provide the projected revenue collections based on the gas sales forecast (July 2020 through June 2021) as Attachment D4 to this filing.<sup>5</sup> These attachments provide period transactions, as well as beginning and ending Tracker balances, as specified in the Commission's September 23, 2010 Order in Docket No. E,G002/M-10-210.

We provide as Attachment F to this filing, the Bridge Schedule from our most recent natural gas rate case, reflecting the 2010 test year. Please refer to Attachment F, column (5), page 1 of 3, which shows that the SEP rate base was removed from the test year rate base; Attachment F, column (5), page 2 of 3, shows that the SEP revenues and expenses were removed from the test year operating income. The costs and revenues included in the natural gas SEP rider revenue requirements are not included for recovery under any other tariff rate or base rate.

For a breakdown of the actual ADRND costs, please see Attachment D1.

## B. Natural Gas Cast Iron Pipe Replacement Project

We completed the Cast Iron Pipe Replacement Project in 2012, replacing 25 miles of cast iron pipe, though revenue requirements continue until the capitalized costs are fully depreciated. No additional cast iron renewal is planned. The June 3, 2013 Order in Docket No. E002/M-13-161 discontinued reporting requirements associated with specific cast iron replacement projects.

The Minnesota jurisdictional total revenue requirements associated with this project for the 2019-2020 SEP Rider rate factor is approximately \$1.4 million. See Attachment D2 for the detailed calculation of the Cast Iron Pipe Replacement Project revenue requirements. Attachment E shows the base assumptions used to calculate the cast iron pipe revenue requirements.

## C. O&M Credit Calculation

The September 23, 2010 Order<sup>6</sup> requires that we adjust our O&M credit in this filing to reflect the outcome of our natural gas rate case in Docket No. G002/GR-09-1153.

We provide the calculation of the O&M credit calculation as Attachment D3 to this filing. Consistent with our 2012 filing and subsequent filings, we have credited the

<sup>&</sup>lt;sup>4</sup> Includes interdepartmental sales.

<sup>&</sup>lt;sup>5</sup> Summer 2019 sales forecast.

<sup>&</sup>lt;sup>6</sup> Docket No. E,G002/M-10-210

overall O&M level to reflect the portion of cast iron pipe replaced through the 2010 test year as that amount is reflected in base rates.

#### D. Rate of Return

Order Point No. 5 of the August 24, 2017 Order<sup>7</sup> requires the Company to use the capital structure authorized in the Company's 2013 electric rate case (Docket No. E002/GR-13-868) to calculate the SEP Rider revenue requirement. Attachment E – Base Assumptions – shows the 2017 and 2018 capital structure as approved in the 2013 electric rate case. We have used this capital structure to calculate the revenue requirements for the 2019-2020 SEP Rider. We note that the table at the bottom of page 5 of the August 24, 2017 Order misstates the long-term debt approved in the 2013 rate case. We have used 45.61 percent as approved in the rate case instead of the 45.01 percent shown on the table in the Order, in compliance with Order Point No. 5.

Order Point No. 5 also requires that the Company use a 9.04 percent Return on Equity (ROE) to calculate the SEP Rider revenue requirement, which is the ROE recommended by the Department in the Company's Gas Utility Infrastructure Cost (GUIC) Rider in Docket No. G002/M-16-891 and later approved in the Commission's February 8, 2018 Order. We have used the 9.04 ROE to calculate the SEP Rider revenue requirements for the 2019-2020 SEP Rider. See Attachment E.

Beginning with January 2018, the 21 percent federal tax rate was incorporated into all SEP Rider revenue requirement calculations.

## E. Accumulated Deferred Income Taxes (ADIT)

Order Point No. 3 of the August 24, 2017 Order<sup>8</sup> states that the Company shall not prorate its ADIT in the SEP Rider. As the Company discussed in our 2018 SEP Rider Petition, whenever a given rate is set, the months prior to that date can be treated as actuals, without proration.<sup>9</sup> Since we propose to implement a new rate factor July 1, 2020 after the test period ends on June 30, 2020, the revenue requirement calculation excludes proration for the 2019-2020 SEP months.

<sup>&</sup>lt;sup>7</sup> Docket No. G002/M-17-174

<sup>&</sup>lt;sup>8</sup> Docket No. G002/M-17-174

 $<sup>^{9}</sup>$  See the Company's March 1, 2018 Petition in Docket No. G002/M-18-184 and the referenced IRS Private Letter Ruling (PLR) #201717008.

## F. Proposed Tariff and Customer Notice

Our proposed SEP Rider tariff provides that the SEP rate factor be included on each natural gas customer's monthly bill effective July 1, 2020, which is done as part of the Resource Adjustment line on monthly bill statements.

We provide as Attachment A1 to this filing proposed changes to our Natural Gas Rate Book, Section No. 5, 17<sup>th</sup> Revised Sheet No. 63 in both redline and clean versions.

We will submit a compliance filing in this docket containing the final updated natural gas SEP Rider rate factor calculations and corresponding tariff pages within 10 days of receiving the Commission's Order approving this Petition.

We propose to implement the following bill message, effective the first month the updated natural gas SEP Rider rate factor takes effect, notifying customers of the change in their monthly bills:

We have updated the Resource Adjustment line item on your bill to reflect changes in the State Energy Policy (SEP) portion of the Resource Adjustment, which recovers the costs for cast iron pipe replacement and to support Minnesota's interests in energy decisions made at the regional and national levels. The natural gas SEP portion of the Resource Adjustment decreased to \$0.000943 per therm.

In compliance with Order Point No. 10 of the August 24, 2017 Order<sup>10</sup>, the proposed customer notice reflects the customer notice approved in the last SEP proceeding, Docket No. G002/M-19-200.<sup>11</sup> We will work with Commission Staff regarding this proposed customer notice in advance of implementation.

#### VII. SEP COMPLIANCE INFORMATION AND TRUE-UP

## A. Over/Under Collection Adjustment

The actual over-recovered amount included in the 2019-2020 SEP Rider Tracker is \$411,879. This is based on the actual revenue collections July 2018 through June 2019. Projected under-recovered costs are estimated based on actual revenue

<sup>&</sup>lt;sup>10</sup> Docket No. G002/M-17-174

<sup>&</sup>lt;sup>11</sup> The Commission did not take specific action on the customer notice language in the July 19, 2019 Order, but adopted the recommendations of the Department of Commerce. Therefore the customer notice was implemented with the Department of Commerce's recommended language reflecting the purpose of the ADRND cost and updating the final rate approved.

collections July 2019 through December 2019, and forecasted revenue collections (forecasted sales times current factor) for January 2020 through June 2020. To calculate the proposed rate factor, the 2019-2020 SEP Rider revenue requirements are combined with the actual over-collections and projected under-collections.

Please see Attachment B for the supporting calculations.

## B. Budget Deviations

The August 24, 2017 Order requires that we provide a comparison between actual and budgeted monthly costs, including a discussion of reasons for deviations from budgeted amounts (both higher and lower). See Attachment C for the comparison by month for the past twelve months (January 2019 – December 2019) of actual natural gas costs (revenue requirements) to the budgeted (forecast) costs excluding carryover balances. Specific deviations are explained below.

Two main factors contributed to the differences between the 2019 monthly actuals and budgeted natural gas costs. First, the ADRND costs were \$20,058 higher than forecasted. These costs were excluded from the 2019 budget because the state legislature did not have approved funding of the ADRND at the time the forecast was developed. Second, cast iron pipe replacement costs were \$39,058 less than forecasted due primarily to lower property tax rates compared to the forecasted rates. In summary, total actual costs for the past twelve months were \$19,001 lower than forecasted:

Tabl	le 3
Budget Deviations	for Past 12 Months
ADRND	\$20,058
Cast Iron	<u>(\$39,058)</u>
Net variance	(\$19,001)

In this same twelve-month period, revenue collections were \$343,329 higher than forecasted. Actual sales levels were higher than the sales used to create the 2018-19 SEP rate, contributing to the increased revenue collection.

#### VIII. CARBON OFFSETS

Order Point No. 1.B of the November 25, 2008 Order requires the Company to report and credit the SEP Tracker with any proceeds received from the sale of carbon offsets or credits associated with the Cast Iron Pipe Replacement project.

We have not sold any carbon offsets or credits for greenhouse gas emissions associated with the natural gas project under the SEP Rider to-date. As a result, there are no carbon offsets and/or credits to report, nor are there proceeds to credit to the SEP Rider tracker account.

In 2012, we began to report annually to the U.S. Environmental Protection Agency (EPA) on greenhouse gas emissions for all types of natural gas pipe material.<sup>12</sup> In previous SEP proceedings, we committed to provide this report as an attachment in future SEP Petitions. Because we submit the data to the EPA website via electronic form, we include as Attachment H the summary report print-out of the Company's data for 2018 as reported to the EPA in March 2019.

#### **CONCLUSION**

We respectfully request that the Commission approve our updated natural gas SEP Rider rate factor as proposed in this Petition, our annual SEP compliance filing, and our proposed customer notice and tariff update.

Dated: February 28, 2020

Respectfully submitted by:

Northern States Power Company

<sup>&</sup>lt;sup>12</sup> 40 C.F.R. Part 98, Subparts A and W, provide the regulatory framework for the Greenhouse Gas (GHG) Reporting Program (November 10, 2010). The GHG calculation methodologies used in the rule generally include the use of engineering estimates, emissions modeling software, and emission factors, or, when other methods are not feasible, direct measurement of emissions. The established emission factor for cast iron main is 27.67 scf/hour/mile.

# STATE OF MINNESOTA BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie Sieben Chair

Valerie Means Commissioner
Matthew Schuerger Commissioner
John Tuma Commissioner

IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY FOR APPROVAL OF A MODIFICATION TO OUR NATURAL GAS SEP TARIFF, UPDATED SEP RATE FACTOR, AND SEP COMPLIANCE FILING DOCKET NO. G002/M-20-\_\_\_

PETITION AND COMPLIANCE REPORT

#### **SUMMARY**

Please take notice that on February 28, 2020, Northern States Power Company, doing business as Xcel Energy, filed with the Minnesota Public Utilities Commission a Petition for approval of an updated natural gas State Energy Policy (SEP) Rider rate factor, pursuant to Minn. Stat. §§ 216B.16, subd. 1 and 216B.62 subd. 3b, Minn. R. 7829.1300 and 7829.0100, and previous Commission Orders in our SEP Rider filings. The Petition includes the Company's annual SEP compliance filing.

## State Energy Policy Rider Petition Attachment Table of Contents

#### **SEP Tariff Sheets and Rate**

Attachment A1 – Tariff

Attachment A2 – Rate Factor

## Cost Recovery and SEP Rate Calculations

Attachment B – Tracker

Attachment C – Budget Deviation Analysis

#### Gas Tracker Detail

Attachment D1 - Tracker Detail - Assessment of Department Regional and National Duties

Attachment D2 – Tracker Detail – Cast Iron Pipe Replacement Revenue Requirement

Attachment D3 – Tracker Detail – Cast Iron Pipe O&M Credit

Attachment D4 – Tracker Detail – Revenue Collections

## Compliance

Attachment E – Base Assumptions – Cast Iron Pipe

Attachment F – Rate Case Bridge Schedule

Attachment G – Revenue Requirement Category Descriptions

Attachment H – Reporting to the U.S. Environmental Protection Agency re. Greenhouse Gas Emissions

Docket No. G002/M-20-\_\_\_\_ Petition Attachment A1 Page 1 of 4

## Redline

#### MINNESOTA GAS RATE BOOK - MPUC NO. 2

#### STATE ENERGY POLICY RATE RIDER

Section No. 5

16th17th Revised Sheet No.

63

R

#### **APPLICATION**

Applicable to bills for gas service provided under the Company's retail rate schedules.

#### **DETERMINATION OF CHARGES UNDER THIS RIDER**

Customer bills under this rate will include the specific charges listed below.

#### **RIDER**

There shall be included on each customer's monthly bill a State Energy Policy Rate Rider which shall be the applicable State Energy Policy Rate Rider factor multiplied by the customer's monthly therm gas consumption.

#### **DETERMINATION OF STATE ENERGY POLICY RATE FACTOR**

The applicable State Energy Policy Rate Rider shall be the quotient obtained by dividing the annual State Energy Policy Tracker amount by the annual forecasted therm sales. The factor may be adjusted annually with approval of the Minnesota Public Utilities Commission.

Residential \$0.001173\0.000943 per therm

Commercial \$0.001173\0.000943 per therm

#### Recoverable State Energy Policy Rate Expense

All costs appropriately charged to the State Energy Policy Tracker account shall be eligible for recovery through this Rider, and all revenues received from the State Energy Policy adjustment portion of the Resource Adjustment shall be credited to the State Energy Policy Tracker account.

Date Filed: 03-01-1902-28-20 By: Christopher B. Clark Effective Date: 08-01-19

President, Northern States Power Company, a Minnesota corporation

Docket No. G002/M-<del>19-20020-</del> Order Date: <del>07-19-19</del>

Docket No. G002/M-20-Petition Attachment A1 Page 3 of 4

## Clean

#### MINNESOTA GAS RATE BOOK - MPUC NO. 2

#### STATE ENERGY POLICY RATE RIDER

Section No. 5 17th Revised Sheet No. 63

R

#### **APPLICATION**

Applicable to bills for gas service provided under the Company's retail rate schedules.

#### **DETERMINATION OF CHARGES UNDER THIS RIDER**

Customer bills under this rate will include the specific charges listed below.

#### **RIDER**

There shall be included on each customer's monthly bill a State Energy Policy Rate Rider which shall be the applicable State Energy Policy Rate Rider factor multiplied by the customer's monthly therm gas consumption.

#### **DETERMINATION OF STATE ENERGY POLICY RATE FACTOR**

The applicable State Energy Policy Rate Rider shall be the quotient obtained by dividing the annual State Energy Policy Tracker amount by the annual forecasted therm sales. The factor may be adjusted annually with approval of the Minnesota Public Utilities Commission.

Residential \$0.000943 per therm Commercial \$0.000943 per therm

#### Recoverable State Energy Policy Rate Expense

All costs appropriately charged to the State Energy Policy Tracker account shall be eligible for recovery through this Rider, and all revenues received from the State Energy Policy adjustment portion of the Resource Adjustment shall be credited to the State Energy Policy Tracker account.

Date Filed: 02-28-20 By: Christopher B. Clark Effective Date:

President, Northern States Power Company, a Minnesota corporation

Docket No. G002/M-20- Order Date:

Gas Rate Factor												
	note		Ordered (5)		Rate Year		Projected					
Revenue Requirement Test Period			<u>2018-2019</u>		2019-2020		<u>2020-2021</u>					
Test Year Project Revenue Requirement	1	\$	1,420,542	\$	1,328,831	\$	1,291,235					
Projected Under/(Over) Collection	2	\$	(118,742)	\$	18,661	\$	355,222					
Prior Year Actual Under/(Over) Collection	3	\$	-	\$	(411,879)	\$	(393,218)					
Net Revenues to be Collected		\$	1,301,800	\$	935,613	\$	1,253,240					
Therms for Rate			1,109,497,520		992,590,020							
Gas Rate/therm			0.001173		0.000943							
Implemented Rate/therm			0.001173		0.000943							
Residential bill impact / Month	4	\$	0.08	\$	0.07							
Residential bill impact / Year	4	\$	0.99	\$	0.80							

#### Notes:

- (1) Revenue requirement on Cast Iron Pipe Replacement Projects, and net O&M costs.
- (2) Estimated Current Rider year under/(over) collection.
- (3) Prior Rider years actual under/(over) collection plus carbon offset credits, if any.
- (4) Assumes 844 therms per year which equates to 70.33 therms per month.
- (5) See Docket No. G002/M-19-200; Rate effective August 1, 2019.

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Annual True-Up Calculation	Reference	Carryo	er	Jul-18	Aug-18		Sep-18	Oct-18	Nov-18	1	Dec-18	Ja	an-19	Feb-19	Mar-19	Apr-19	9	May-19		Jun-19	Tot	tal - 18/19	Annual
	Attachment	Balane	e	Actual	Actual		Actual	Actual	Actual		Actual	Α	ctual	Actual	Actual	Actua	1	Actual		Actual	1	Actual	True-Up
ADRND (1)	D1		\$	-	S -	\$	-	ş -	\$ -	\$	7,088	\$	-	ş -	\$ -	\$	-	S -	s	6,873	\$	13,961	
Cast Iron	D2		\$	122,354	\$ 122,089	9 \$	121,824	\$ 121,559	\$ 121,294	s	121,029	\$	117,524	\$ 117,263	\$ 117,001	\$ 116,	739	\$ 116,478	s	116,216	\$	1,431,370	
Cast Iron O&M Credit	D3		\$	(6,026)	\$ (6,020	6) \$	(6,026)	\$ (6,026)	\$ (6,026)	) \$	(6,026)	\$	(6,026)	\$ (6,026)	\$ (6,026)	\$ (6,	026)	\$ (6,026)	\$	(6,026)	\$	(72,310)	
Project Revenue Requirements			\$	116,328	\$ 116,063	3 \$	115,798	\$ 115,533	\$ 115,268	S	122,092	\$	111,498	\$ 111,237	\$ 110,975	\$ 110,	714	\$ 110,452	\$	117,063	\$	1,373,022	
Carryover from Prev Yr (2)		\$ 34,	363 \$	2,905	\$ 2,90	5 \$	2,905	\$ 2,905	\$ 2,905	\$	2,905	\$	2,905	\$ 2,905	\$ 2,905	\$ 2,	905	\$ 2,905	s	2,905	\$	34,863	
Carbon Offset Payments (3)		\$	- \$	-	S -	s	-	\$ -	\$ -	s	-	\$	-	\$ -	\$ -	S	-	Ş -	s	-	\$	-	
Net Projected Revenue Collections			\$	119,233	\$ 118,96	8 \$	118,703	\$ 118,438	\$ 118,173	s	124,997	\$	114,404	\$ 114,142	\$ 113,880	\$ 113,	619	\$ 113,357	\$	119,969	\$	1,407,885	\$ 1,407,885
Actual Revenue Collections (4)	D4		\$	91,840	\$ 85,253	2 \$	69,296	\$ 73,778	\$ 114,719	s	170,880	\$	222,843	\$ 272,117	\$ 274,429	\$ 205,	131	\$ 133,796	s	105,681	\$	1,819,763	\$ 1,819,763
Actual Net Under/(Over) Collection (5)			_																				\$ (411,879)

Revenue Needs - Current Year Calculation (6)	Reference	Carryover	Ju	1-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Total - 19/20	Net Revenue
	Attachment	Balance	Ac	tual	Actual	Actual	Actual	Actual	Actual	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Requirement
ADRND (1)	D1		\$	- :	\$ -	\$ 6,592	\$ -	\$ -	\$ 6,592	\$ -	\$ -	\$ 6,873	S -	s -	\$ 6,873	\$ 26,931	
Cast Iron	D2		\$	115,955	\$ 115,693	\$ 115,431	\$ 115,170	\$ 114,908	\$ 114,646	\$ 114,387	\$ 114,126	\$ 113,865	\$ 113,604	\$ 113,343	\$ 113,082	\$ 1,374,210	
Cast Iron O&M Credit	D3		\$	(6,026)	\$ (6,026)	\$ (6,026)	\$ (6,026)	\$ (6,026)	\$ (6,026)	\$ (6,026)	\$ (6,026)	\$ (6,026)	\$ (6,026)	\$ (6,026)	\$ (6,026)	\$ (72,310)	
Project Revenue Requirements			\$	109,929	\$ 109,667	\$ 115,998	\$ 109,144	\$ 108,882	\$ 115,213	\$ 108,361	\$ 108,100	\$ 114,712	\$ 107,578	\$ 107,317	\$ 113,929	\$ 1,328,831	\$ 1,328,831
Actual/Forecasted Revenue Collections (4)	D4		ş	119,030	\$ 92,507	\$ 68,228	\$ 95,499	\$ 107,674	\$ 173,573	\$ 186,037	\$ 149,627	\$ 127,764	\$ 78,085	\$ 59,214	\$ 52,931	\$ 1,310,170	
Current Year Projected Under/(Over) collection			\$	(9,101)	\$ 17,160	\$ 47,770	\$ 13,645	\$ 1,208	\$ (58,360)	\$ (77,676)	\$ (41,527)	\$ (13,052)	\$ 29,493	\$ 48,103	\$ 60,998	\$ 18,661	\$ 18,661
Prior Year Actual Under/(Over) collection (7)		\$ (411,879)															\$ (411,879)
Current Year Carbon Offset Payments (3)		\$ -															\$ -
Net Revenue Requirement for Test Period R	ate (8)																\$ 935.613

Projected Revenue Needs	Attachment		Jul-2	0	Aug-20	Sep-2	0	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Total - 20/21	Net Revenue
			Foreca	ast	Forecast	Foreca	st	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Requirement
ADRND (1)	D1		\$	- 8	-	\$ 6	,592	\$ -	\$ -	\$ 6,592	S -	S -	\$ 6,873	\$ -	\$ -	\$ 6,873	\$ 26,931	
Cast Iron	D2		\$ 112	2,821	112,559	\$ 112	,298	\$ 112,037	\$ 111,776	\$ 111,51	\$ 111,254	\$ 110,993	\$ 110,732	\$ 110,471	\$ 110,210	\$ 109,948	\$ 1,336,614	
Cast Iron O&M Credit	D3		\$ (6	5,026) \$	(6,026)	\$ (6.	,026)	\$ (6,026)	\$ (6,026)	\$ (6,020	\$ (6,026)	\$ (6,026)	\$ (6,026)	\$ (6,026)	\$ (6,026)	\$ (6,026)	\$ (72,310)	
Project Revenue Requirements			\$ 106	5,795	106,534	\$ 112	,865	\$ 106,011	\$ 105,750	\$ 112,082	\$ 105,228	\$ 104,967	\$ 111,579	\$ 104,445	\$ 104,184	\$ 110,796	\$ 1,291,235	\$ 1,291,235
Forecasted Revenue Collections (4)	D4		<b>\$</b> 53	3,454 \$	52,234	\$ 38.	,275	\$ 59,432	\$ 90,179	\$ 131,41	\$ 148,658	\$ 116,488	\$ 103,617	\$ 62,838	\$ 42,520	\$ 36,904	\$ 936,012	
Current Under/(Over) Collection			\$ 53	3,341 \$	54,299	\$ 74	,590	\$ 46,580	\$ 15,571	\$ (19,332	\$ (43,430)	\$ (11,521)	\$ 7,962	\$ 41,607	\$ 61,664	\$ 73,891	\$ 355,222	\$ 355,222
Prior Year Actual Under/(Over) collection		\$ (393,218)																\$ (393,218)
Current Year Carbon Offset Payments (3)		s -																\$ (333,210) \$ -
Net Revenue Requirement for Test Period Rate (	8)																	\$ 1,253,240

#### Notes

- (1) ADRND actual expenses are for invoiced amounts or forecasted levels based on prior actuals.
- (2) The Carryover from Previous Year is the balance (Revenue Requirements minus Revenue Collections) from the preceeding year, and included as part of the Revenue Requirement under the previous Projected Test Year method.
- (3) The Company does not forecast any carbon offset payments related to the natural gas cast iron pipe replacement project.
- (4) Revenue Collections are actual through December 2019 and forecasts thereafter.
- (5) Balance is the amount (over) under collected or the difference between the actual revenue requirements and the amount of actual revenue received from customers under this Rider. This will be refunded to/or collected from customers by decreasing or increasing to revenue needs in the current petition.
- (6) The revenue requirement upon which the rate to be used for the 2020/2021 plan year is being based on the historical 2019/2020 plan year costs.
- (7) Represents the annual true-up of the prior year actuals that will flow through to customers in the current SEP factor calculation. (Prior year over collection reduces the proposed SEP factor, prior year under collection increases the proposed SEP factor.)
- (8) Represents the net Revenue Requirement amount upon which the SEP factor will be based. It consists of the SEP project revenue requirements, allowable O&M costs, O&M credits, prior rider year true-up of over or under collections based on actuals revenues and expenses and Carbon offset payments.

#### State Energy Policy (SEP) Rider Comparison by month of actual revenue requirements versus as ordered revenue requirements

Docket No. G002/M-20-\_\_\_ 2020 SEP Compliance Attachment C Page 1 of 1

#### Gas Tracker

			2018-2019 SI	EP Period			2019-2020 SEP Period							
	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19		
	<b>Projected</b>	Projected	<b>Projected</b>	Projected	Total									
Natural Gas Revenue Requirements (calculation from Docket 19-200 as filed)	114,754	114,492	114,230	113,969	113,707	113,445	113,184	112,922	112,660	112,399	112,137	111,875	1,359,773	
	Jan-19 <u>Actual</u>	Feb-19 <u>Actual</u>	Mar-19 <u>Actual</u>	Apr-19 <u>Actual</u>	May-19 <u>Actual</u>	Jun-19 <u>Actual</u>	Jul-19 <u>Actual</u>	Aug-19 <u>Actual</u>	Sep-19 <u>Actual</u>	Oct-19 <u>Actual</u>	Nov-19 <u>Actual</u>	Dec-19 <u>Actual</u>	Total	
Natural Gas Revenue Requirements	111,498	111,237	110,975	110,714	110,452	117,063	109,929	109,667	115,998	109,144	108,882	115,213	1,340,773	
Variance Ordered vs.														
actual-Gas Revenue Requirements	3,255	3,255	3,255	3,255	3,255	-3,618	3,255	3,255	-3,338	3,255	3,255	-3,338	19,001	

			2018-2019 S	EP Period					2019-2020 S	EP Period	2019-2020 SEP Period							
	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19						
	<b>Projected</b>	Total																
Natural Gas Revenue (calculation from Docket 19-200 as filed)	255,706	196,994	179,702	125,313	88,505	87,297	72,126	74,067	57,029	96,680	122,016	171,743	1,527,179					
	Jan-19 <b>Actual</b>	Feb-19 <b>Actual</b>	Mar-19 <b>Actual</b>	Apr-19 <b>Actual</b>	May-19 <b>Actual</b>	Jun-19 <b>Actual</b>	Jul-19 <b>Actual</b>	Aug-19 <b>Actual</b>	Sep-19 <b>Actual</b>	Oct-19 <u>Actual</u>	Nov-19 <u>Actual</u>	Dec-19 <u>Actual</u>	Total					
Natural Gas Revenue	222,843	272,117	274,429	205,131	133,796	105,681	119,030	92,507	68,228	95,499	107,674	173,573	1,870,508					
Variance Forecast vs.																		
actual-Gas Revenues	32,863	-75,122	-94,727	-79,818	-45,291	-18,384	-46,904	-18,441	-11,199	1,181	14,342	-1,829	-343,329					

Net Result -362,329

The revenue requirements data has been adjusted to exclude the carryover balance to better compare the monthly actual costs to the equivalent forecasted costs.

Gas Tracker Detail												
ADRND												
		AD	ORND Invoice									
Jul-18	Actual	\$	-									
Aug-18	Actual	\$	-									
Sep-18	Actual	\$	-									
Oct-18	Actual	\$	-									
Nov-18	Actual	\$	-									
Dec-18	Actual	\$	7,088									
Jan-19	Actual	\$	-									
Feb-19	Actual	\$	-									
Mar-19	Actual	\$	-									
Apr-19	Actual	\$	_									
May-19	Actual	\$	-									
Jun-19	Actual	\$	6,873									
Plan Year Total		\$	13,961									
Jul-19	Actual	\$	-									
Aug-19	Actual	\$	-									
Sep-19	Actual	\$	6,592									
Oct-19	Actual	\$	-									
Nov-19	Actual	\$	_									
Dec-19	Actual	\$	6,592									
Jan-20	Actual	\$	-									
Feb-20	Actual	\$	-									
Mar-20	Actual	\$	6,873									
Apr-20	Actual	\$	-									
May-20	Actual	\$	-									
Jun-20	Actual	\$	6,873									
Plan Year Total		\$	26,931									
Jul-20	Actual	\$	-									
Aug-20	Actual	\$	-									
Sep-20	Actual	\$	6,592									
Oct-20	Actual	\$										
Nov-20	Actual	\$	-									
Dec-20	Actual	\$	6,592									
Jan-21	Actual	\$	-									
Feb-21	Actual	\$	-									
Mar-21	Actual	\$	6,873									
Apr-21	Actual	\$	-									
May-21	Actual	\$										
Jun-21	Actual	\$	6,873									
Plan Year Total		\$	26,931									

				(	Gas Track	er Detail							
		Cas	st Iron Pip	pe Replac	ement Re	venue Re	quiremen	nt by Mon	th				
	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Annual-18/19
Rate Base Plus CWIP Ending Balance	0	0	0	0	0	0	0	0	0	0	0	0	0
Plus Plant In-Service	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108
Less Book Depreciation Reserve	2,485,100	2,514,353	2,543,605	2,572,858	2,602,111	2,631,364	2,660,617	2,689,869	2,719,122	2,748,375	2,777,628	2,806,881	2,806,881
Less Accum Deferred Taxes	946,944	953,597	960,249	966,902	973,555	980,207	986,404	992,602	998,799	1,004,996	1,011,193	1,017,390	1,017,390
Less Excess Deferred Taxes	407,903	407,903	407,903	407,903	407,903	407,903	407,903	407,903	407,903	407,903	407,903	407,903	407,903
End Of Month Rate Base	9,896,162	9,860,256	9,824,351	9,788,445	9,752,540	9,716,634	9,681,184	9,645,734	9,610,284	9,574,834	9,539,385	9,503,935	9,503,935
Average Rate Base (BOM/EOM)	9,914,114	9,878,209	9,842,303	9,806,398	9,770,492	9,734,587	9,698,909	9,663,459	9,628,009	9,592,559	9,557,110	9,521,660	9,717,317
Calculation of Return													
Plus Debt Return	18,093	18,028	17,962	17,897	17,831	17,766	17,701	17,636	17,571	17,506	17,442	17,377	212,809
Plus Equity Return Total Return	39,243	39,101	38,959	38,817	38,675	38,533	38,392	38,251	38,111	37,971	37,830	37,690	461,573
I otal Return	57,337	57,129	56,921	56,714	56,506	56,298	56,092	55,887	55,682	55,477	55,272	55,067	674,382
Income Statement Items													
Plus Property Taxes	20,137	20,137	20,137	20,137	20,137	20,137	16,890	16,890	16,890	16,890	16,890	16,890	222,163
Plus Book Depreciation	29,253	29,253	29,253	29,253	29,253	29,253	29,253	29,253	29,253	29,253	29,253	29,253	351,034
Plus Deferred Taxes Plus Excess Deferred Taxes Flowback	6,653	6,653	6,653 0	6,653	6,653 0	6,653 0	6,197 0	6,197 0	6,197 0	6,197 0	6,197 0	6,197	77,099
Plus Current Taxes	8,975	8,917	8,860	8,803	8,745	8,688	9,092	9,036	8,979	8,923	8,866	8,809	106,693
Total Income Statement Expense	65,017	64,960	64,903	64,845	64,788	64,731	61,432	61,376	61,319	61,262	61,206	61,149	756,988
Total Revenue Requirements	122,354	122,089	121,824	121,559	121,294	121,029	117,524	117,263	117,001	116,739	116,478	116,216	1,431,370
Jurisdictional Revenue Requirement	122,354	122,089	121,824	121,559	121,294	121,029	117,524	117,263	117,001	116,739	116,478	116,216	1,431,370
	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Annual-19/20
Rate Base	Jui-17	11ug-19	5cp-13	OCI-17	1404-17	1200-19	Jan-20	1 00-20	19141-2U	14p1-20	111ay-20	Jun-20	- 11111uat-17/20
Plus CWIP Ending Balance	0	0	0	0	0	0	0	0	0	0	0	0	0
Plus Plant In-Service	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108
Less Book Depreciation Reserve	2,836,134	2,865,386	2,894,639	2,923,892	2,953,145	2,982,398	3,011,651	3,040,903	3,070,156	3,099,409	3,128,662	3,157,915	3,157,915
Less Accum Deferred Taxes	1,023,587	1,029,784	1,035,981	1,042,178	1,048,375	1,054,572	1,060,701	1,066,830	1,072,959	1,079,088	1,085,216	1,091,345	1,091,345
Less Excess Deferred Taxes	407,903	407,903	407,903	407,903	407,903	407,903	407,903	407,903	407,903	407,903	407,903	407,903	407,903
End Of Month Rate Base	9,468,485	9,433,035	9,397,585	9,362,135	9,326,685	9,291,235	9,255,854	9,220,472	9,185,090	9,149,709	9,114,327	9,078,946	9,078,946
Average Rate Base (BOM/EOM)	9,486,210	9,450,760	9,415,310	9,379,860	9,344,410	9,308,960	9,273,544	9,238,163	9,202,781	9,167,400	9,132,018	9,096,636	9,291,338
Calculation of Return													
Plus Debt Return	17,312	17,248	17,183	17,118	17,054	16,989	16,924	16,860	16,795	16,731	16,666	16,601	203,480
Plus Equity Return Total Return	37,550 54,862	37,409 54,657	37,269 54,452	37,129 54,247	36,988 54,042	36,848 53,837	36,708 53,632	36,568 53,427	36,428 53,223	36,288 53,018	36,148 52,814	36,008 52,609	441,339 644,819
	· 1,00 <u>-</u>	- 1,000	- 1,10=	- ·, <u>-</u> · ·	~ .,	,	******	***, ***	,	00,010	v=,	v=,···	0.,,0
Income Statement Items													
Plus Property Taxes	16,890	16,890	16,890	16,890	16,890	16,890	16,890	16,890	16,890	16,890	16,890	16,890	202,679
Plus Book Depreciation	29,253	29,253	29,253	29,253	29,253	29,253	29,253	29,253	29,253	29,253	29,253	29,253	351,034
Plus Deferred Taxes	6,197	6,197	6,197	6,197	6,197	6,197	6,129	6,129	6,129	6,129	6,129	6,129	73,955
Plus Excess Deferred Taxes Flowback Plus Current Taxes	0 8,753	0 8,696	0 8,640	0 8,583	0 8,526	0 8,470	8,484	8,427	8,371	0 8,314	8,258	8,201	101,723
Total Income Statement Expense	61,093	61,036	60,979	60,923	60,866	60,810	60,755	60,699	60,642	60,586	60,529	8,201	729,391
Total Revenue Requirements	115,955	115,693	115,431	115,170	114,908	114,646	114,387	114,126	113,865	113,604	113,343	113,082	1,374,210
Jurisdictional Revenue Requirement	115,955	115,693	115,431	115,170	114,908	114,646	114,387	114,126	113,865	113,604	113,343	113,082	1,374,210
	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Annual-20/21
Rate Base	Jui-20	- rug-20	0cp 20	04720	1101-20	1500-20	J 21			14p1-21	y-21	Jun-21	
Plus CWIP Ending Balance	0	0	0	0	0	0	0	0	0	0	0	0	0
Plus Plant In-Service	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108
Less Book Depreciation Reserve	3,187,167	3,216,420	3,245,673	3,274,926	3,304,179	3,333,432	3,362,684	3,391,937	3,421,190	3,450,443	3,479,696	3,508,949	3,508,949
Less Accum Deferred Taxes Less Excess Deferred Taxes	1,097,474 407,903	1,103,603 407,903	1,109,732	1,115,860 407,903	1,121,989 407,903	1,128,118	1,134,245 407,903	1,140,373	1,146,501 407,903	1,152,628	1,158,756	1,164,883	1,164,883
End Of Month Rate Base	9,043,564	9,008,182	407,903 8,972,801	8,937,419	8,902,037	407,903 8,866,656	8,831,275	407,903 8,795,895	8,760,515	407,903 8,725,134	407,903 8,689,754	407,903 8,654,374	407,903 8,654,374
Average Rate Base (BOM/EOM)	9,061,255	9,025,873	8,990,491	8,955,110	8,919,728	8,884,347	8,848,966	8,813,585	8,778,205	8,742,824	8,707,444	8,672,064	8,866,658
Calculation of Return													
Plus Debt Return	16,537	16,472	16,408	16,343	16,279	16,214	16,149	16,085	16,020	15,956	15,891	15,827	194,180
Plus Equity Return	35,867	35,727	35,587	35,447	35,307	35,167	35,027	34,887	34,747	34,607	34,467	34,327	421,166
Total Return	52,404	52,200	51,995	51,790	51,586	51,381	51,177	50,972	50,767	50,563	50,358	50,153	615,346
Income Statement Items													
Plus Property Taxes	16,890	16,890	16,890	16,890	16,890	16,890	16,890	16,890	16,890	16,890	16,890	16,890	202,679
Plus Book Depreciation	29,253	29,253	29,253	29,253	29,253	29,253	29,253	29,253	29,253	29,253	29,253	29,253	351,034
Plus Deferred Taxes	6,129	6,129	6,129	6,129	6,129	6,129	6,128	6,128	6,128	6,128	6,128	6,128	73,538
Plus Excess Deferred Taxes Flowback	0	0	0	0	0	0	0	0	0	0	0	0	0
Plus Current Taxes	8,145	8,088	8,032	7,975	7,919	7,862	7,807	7,751	7,694	7,638	7,581	7,525	94,017
Total Income Statement Expense	60,416	60,360	60,303	60,247	60,190	60,134	60,077	60,021	59,964	59,908	59,851	59,795	721,268
Total Revenue Requirements	112,821	112,559	112,298	112,037	111,776	111,515	111,254	110,993	110,732	110,471	110,210	109,948	1,336,614
Jurisdictional Revenue Requirement	112,821	112,559	112,298	112,037	111,776	111,515	111,254	110,993	110,732	110,471	110,210	109,948	1,336,614

Notes

Updates to 2018 balances included in Docket No. G002/M-19-200 result from Composite Tax rate and Property Tax rate updates effective 1/1/2019.

		Gas Tracl	ker 10 Yea	r Summa	ry					
Cast Iron Pipe Replacement Revenue Requirement by Year (July - June)										
	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21
Rate Base										
Plus CWIP Ending Balance	0	0	0	0	0	0	0	0	0	0
Plus Plant In-Service	10,782,150	13,736,109	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108	13,736,108
Less Book Depreciation Reserve	367,414	700,678	1,051,711	1,402,745	1,753,779	2,104,813	2,455,847	2,806,881	3,157,915	3,508,949
Less Accum Deferred Taxes	296,641	531,982	747,645	936,573	1,100,544	1,242,429	940,291	1,017,390	1,091,345	1,164,883
Less Excess Deferred Taxes							407,903	407,903	407,903	407,903
End Of Month Rate Base	10,118,095	12,503,449	11,936,752	11,396,790	10,881,785	10,388,867	9,932,067	9,503,935	9,078,946	8,654,374
Average Rate Base (BOM/EOM)	8,400,586	12,097,994	12,216,681	11,663,507	11,136,312	10,632,779	10,153,984	9,717,317	9,291,338	8,866,658
Calculation of Return										
Plus Debt Return	233,763	303,346	278,611	261,249	248,916	234,997	222,372	212,809	203,480	194,180
Plus Equity Return	446,979	642,934	649,295	621,089	591,901	564,075	482,314	461,573	441,339	421,166
Total Return	680,742	946,280	927,907	882,338	840,817	799,072	704,686	674,382	644,819	615,346
Income Statement Items										
Plus Property Taxes	117,456	228,825	288,830	279,257	267,922	255,880	243,974	222,163	202,679	202,679
Plus Book Depreciation	226,174	333,264	351,034	351,034	351,034	351,034	351,034	351,034	351,034	351,034
Plus Deferred Taxes	179,317	235,341	215,663	188,928	163,971	141,884	105,766	77,099	73,955	73,538
Plus Excess Deferred Taxes Flowback	0	0	0	0	0	0	0	0	0	0
Plus Current Taxes	132,542	213,293	237,495	244,716	249,811	253,034	159,840	106,693	101,723	94,017
Total Income Statement Expense	655,489	1,010,722	1,093,022	1,063,935	1,032,738	1,001,832	860,613	756,988	729,391	721,268
Total Revenue Requirements	1,336,231	1,957,002	2,020,928	1,946,272	1,873,555	1,800,904	1,565,300	1,431,370	1,374,210	1,336,614
MN Jurisdictional Revenue Requirement	1,336,231	1,957,002	2,020,928	1,946,272	1,873,555	1,800,904	1,565,300	1,431,370	1,374,210	1,336,614

#### Notes

Updates to 2018 balances included in Docket No. G002/M-19-200 result from Composite Tax, and Property Tax rates.

## Gas Tracker Detail Cast Iron O&M Credit

	Part A: Derivation of the Annual Credit Amount	
1	Overall O&M Expenses (1)	\$ 39,980,000
2	Total Gas Distribution Main in Minnesota (miles)	8,864
3	Average Test Year O&M Expenses per Mile of Gas Distribution Main (Line 1/Line 2)	\$ 4,510
4	Potential Percentage Reduction in O&M Expenses Associated with Gas Cast Iron (2)	93.48%
5	Potential O&M Expense Associated with Gas Cast Iron Pipe to be Replaced per Mile (Line 3*Line 4)	\$ 4,216
6	Gas Cast Iron Pipe to be Replaced (miles)	25
7	Potential Annual O&M Expenses Reduction due to Gas Cast Iron Replacement (Line 5*Line 6)	\$ 105,408
	Part B: Derivation of the Recovery in Base Rates	
8	Miles replaced in 2009	5.0
9	Miles replaced in 2010	5.7
10	Total Miles reflected in reduced O&M in base rates (Line 8 + Line 9*50%)	7.9
11	Expense Reduction per line mile (Line 5)	\$ 4,216
12	Annual Credit reflected in base rates (Line 10*Line 11)	\$ 33,098
	Part C: Derivation of SEP Rider Credit	
13	Miles to be replaced in 2010	5.7
14	Miles to be replaced in 2011	7.6
15	Miles to be replaced in 2012	6.7
16	Total Miles included in SEP O&M Credit (Lines 13*50% + Line 14 + Line 15)	17.2
17	Expense Reduction per line mile (Line 5)	\$ 4,216
18	SEP O&M Credit (Line 16*Line 17)	\$ 72,310
	Part D: Reconciliation	
19	Credit reflected in base rates (Line 12)	\$ 33,098
20	SEP O&M Credit in 2012 (Line 18)	\$ 72,310
21	Potential Expense Reduction (Line 7) = Recovery in Base Rates (Line 12) + 2012 Credit (18)	\$ 105,408

#### Notes:

<sup>(1)</sup> Docket No. G002/GR-09-1153

<sup>(2)</sup> Average of 0.28571 leaks per mile associated with the gas cast iron minus an average of 0.01986 leaks per mile for overall gas distribution system piping. (0.28571-0.01986)/0.28571=93.48%. As of 2012, all east iron had been removed and the leak rate cannot be reported. The average leak rate for the overall system was 0.01421 leaks/mile. The O&M credit approved in Docket No. E,G002/M-13-161 is assumed in 2013 and beyond, since all replacement work has been completed.

## Gas Tracker Detail

## Revenue Collections (SEP Rider Fiscal Period July - June)

Actual Revenues Through December 2019 and Forecast Revenues (Therm Sales \* Gas Factor) through June 2021

2018 Rider Year		Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Total-18/19
		Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	
Revenue Collections	\$	91,840 \$	85,252 \$	69,296 \$	73,778 \$	114,719	\$ 170,880	\$ 222,843 \$	272,117 \$	274,429 \$	205,131 \$	133,796	\$ 105,681	1,819,763
2019 Rider Year		Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Total-19/20
		Actual	Actual	Actual	Actual	Actual	Actual	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	
Forecast Sale	:s							158,599,555	127,559,590	108,920,903	66,568,749	50,480,593	45,124,676	557,254,067
Ra	te							0.001173	0.001173	0.001173	0.001173	0.001173	0.001173	
Revenue Collections	\$	119,030 \$	92,507 \$	68,228 \$	95,499 \$	107,674	\$ 173,573	\$ 186,037 \$	149,627 \$	127,764 \$	78,085 \$	59,214	\$ 52,931	1,310,170
2020 Rider Year		Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Total-20/21
		Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	
Forecast Sale	es .	56,684,722	55,391,820	40,588,465	63,023,954	95,630,160	139,357,507	157,643,860	123,528,971	109,879,704	66,635,829	45,090,122	39,134,908	992,590,020
Ra	te	0.000943	0.000943	0.000943	0.000943	0.000943	0.000943	0.000943	0.000943	0.000943	0.000943	0.000943	0.000943	
Revenue Collections	\$	53,454 \$	52,234 \$	38,275 \$	59,432 \$	90,179	\$ 131,414	\$ 148,658 \$	116,488 \$	103,617 \$	62,838 \$	42,520	\$ 36,904	936,012

## Base Assumptions - Gas Cast Iron Pipe

Capital Structure		2018 *			2019 *		2020 *			
	Percent	Cost	Weighted Cost	Percent	Cost	Weighted Cost	Percent	Cost	Weighted Cost	
Long Term Debt %	45.61%	4.71%	2.15%	45.61%	4.71%	2.15%	45.61%	4.71%	2.15%	
Short Term Debt %	1.89%	1.91%	0.04%	1.89%	1.91%	0.04%	1.89%	1.91%	0.04%	
Preferred Stock %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Common Stock %	52.50%	9.04%	4.75%	52.50%	9.04%	4.75%	52.50%	9.04%	4.75%	
	100.00%		6.94%	100.00%		6.94%	100.00%		6.94%	

Income Tax Rates										
		2018	2019	2020		2018	2019	2020		
Income Tax Rates	MN Jur	9.8000%	9.8000%	9.8000%	Federal	21.0000%	21.0000%	21.0000%		
MN Composite Income Tax Rate	MN Jur	28.7420%	28.7420%	28.7420%	MN Co	28.1344%	28.1092%	28.1092%		

Property Tax Rates				
		2018	2019	2020
Property Tax Rate = Goodhue	100.00 % Taxable	1.662%	1.418%	1.418%
Property Tax Rate = Ramsey	100.00 % Taxable	1.798%	1.506%	1.506%
Property Tax Rate = Rice	100.00 % Taxable	1.586%	1.296%	1.296%
Property Tax Rate = Stearns	100.00 % Taxable	1.716%	1.426%	1.426%
Property Tax Rate = Washington	100.00 % Taxable	1.588%	1.332%	1.332%
Property Tax Rate = Winona	100.00 % Taxable	1.443%	1.230%	1.230%

State of MN Allocator			
Gas Distribution		Minnesota	
	Total	Company	Minnesota
Direct Assigned - Minnesota	100.000%	100.000%	100.000%

Northern States Power Company, a Minnesota corporation Gas Operations - State of Minnesota RATE BASE SCHEDULES RATE BASE ADJUSTMENT SCHEDULES 2010 Unadjusted Test Year versus 2010 Adjusted Test Year (\$000's) Docket No. G002/GR-09-1153 Exhibit\_\_\_(AEH-1), Schedule 3A Page 1 of 3

SEP

Line			Gas	Rate Case	Rate Case	Rate Case	Rider	New Area	Income	
	Description	Unadjusted	Storage			Adjustment			Statement	Adjusted
			(1)	(2)	(3)	(4)	(5)	(6)	(7)	
	Gas Plant as Booked									
1	Production	\$15,537								\$15,537
2	Storage	\$30,880								\$30,880
3	Transmission	\$63,410								\$63,410
4	Distribution	\$739,803		(\$2,366)	(\$82)	(\$105)	(\$3,261)			\$733,991
5	General	\$33,543								\$33,543
6	Common	\$62,221								\$62,221
7	TBT Investment	\$0							_	\$0
8	TOTAL Utility Plant in Service	\$945,395		(\$2,366)	(\$82)	(\$105)	(\$3,261)	\$0		\$939,582
	Reserve for Depreciation									
9	Production	\$11,942								\$11,942
10	Storage	\$23,142								\$23,142
11	Transmission	\$24,423								\$24,423
12	Distribution	\$333,684		(\$465)	(\$10)	(\$2)	(\$48)	(\$1,036)		\$332,123
13	General	\$12,567								\$12,567
14	Common	\$41,876							_	\$41,876
15	TOTAL Reserve for Depreciation	\$447,634		(\$465)	(\$10)	(\$2)	(\$48)	(\$1,036)		\$446,074
	Net Utility Plant in Service									
16	Production	\$3,595								\$3,595
17	Storage	\$7,738								\$7,738
18	Transmission	\$38,987								\$38,987
19	Distribution	\$406,119		(\$1,901)	(\$72)	(\$103)	(\$3,213)	\$1,036		\$401,867
20	General	\$20,976								\$20,976
21	Common	\$20,345								\$20,345
22	TBT Investment	\$0							_	\$0
23	Net Utility Plant in Service	\$497,760		(\$1,901)	(\$72)	(\$103)	(\$3,213)	\$1,036		\$493,508
24	Utility Plant Held for Future Use	\$0								\$0
25	Construction Work in Progress	\$4,337								\$4,337
26	Less: Accumulated Deferred Income Taxe	\$92,687		(\$473)	(\$4)	(\$1)	(\$52)	(\$26)		\$92,132
27	Cash Working Capital	(\$4,321)							\$379	(\$3,942)
	Other Rate Base Items:									
28	Materials and Supplies	\$1,037								\$1,037
29	Gas In Storage	\$40,566	\$2,133							\$42,699
30	Non-Plant Assets & Liabilities	(\$9,805)								(\$9,805)
31	Prepayments	\$5,651								\$5,651
32	Customer Advances	(\$1,653)								(\$1,653)
33	Other Working Capital	\$897								\$897
34	Total Other Rate Base Items	\$36,693	\$2,133	\$0	\$0	\$0	\$0	\$0	\$0	\$38,826
35	Total Average Rate Base	\$441,783	\$2,133	(\$1,428)	(\$69)	(\$102)	(\$3,161)	\$1,062	\$379	\$440,597

Projected CIAC 2004 CIAC 2007 CIAC 2010

Northern States Power Company, a Minnesota corporation Gas Operations - State of Minnesota INCOME STATEMENT SCHEDULES INCOME STATEMENT ADJUSTMENT SCHEDULES 2010 Unadjusted Test Year versus 2010 Adjusted Test Year (5000's)

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Line	Description	2010 Unadjusted(1)	Projected Gas Storage Adjustment 1	CIAC 2004 Rate Case Adjustment 2	CIAC 2007 Rate Case Adjustment 3	CIAC 2010 Rate Case Adjustment 4	SEP Rider Adjustment 5	New Area Surcharge Adjustment 6	Charitable Contributions Adjustment 7	Interest on Customer Deposits Adjustment 8	Advertising Adjustment 9	Professional & Association Dues Adjustment 10
	Operating Revenues											
1	Retail	\$580,760					(\$269)					
2	Weather Impact Net Margin Adjustment	0										
3	Interdepartmental & Transportation	9,050										
5	Other Operating Gross Earnings Tax	5,382										
	Total Operating Revenues	\$595,192	\$0	\$0	\$0	\$0	(\$269)	\$0	\$0	\$0	\$0	\$0
		*****	**	**	-	**	(4-0-)	**	**	**	**	**
	Expenses Operating Expenses:											
7	Purchased Gas	\$426.919										
8	Other Production	4,305										
9	Transmission	1,261										
10	Distribution	28,447										
11	Customer Accounting	15,700										
12	Customer Service & Information	14,896							450	40	(05.4)	(0)
13	Administrative & General	17,213							153	16	(254)	(2)
14 15	Sales, Econ Dvlp & Other Total Operating Expenses	\$508,787	\$0	\$0	\$0	\$0	\$0	\$0	\$153	\$16	(19)	(\$2)
	Total Operating Expenses		\$0						\$153	\$16	(\$273)	(\$2)
16 17	Depreciation Amortizations	\$32,877 (99)		(\$72)	(\$3)	(\$3)	(\$70) 99	\$128				
17	Amortizations	(99)					99					
	Taxes:											
18	Property	\$12,798					(\$22)					
19	Gross Earnings	0										
20	Deferred Income Tax & ITC	2,764	(07)	6	(1)	(1)	(70)	(52)	(00)	(7)	***	
21 22	Federal & State Income Tax	6,511	(27)	42	3	4	(4)	(13)	(63)	(7)	113	1
23	Payroll & Other Total Taxes	1,946 \$24,019	(\$27)	\$48	\$2	\$3	(\$96)	(\$65)	(\$63)	(\$7)	\$113	\$1
24	Total Expenses	\$565,584	(\$27)	(\$24)	(\$1)	(\$0)	(\$67)	\$63	\$90	\$9	(\$160)	(\$1)
25	Allowance for Funds Used During Construction	\$414	.,	. ,	.,,	,	,	•	•			***
	-											
26	Total Operating Income	\$30,022	\$27	\$24	\$1	\$0	(\$202)	(\$63)	(\$90)	(\$9)	\$160	\$1
	Revenue Requirement											
27	Total Rate Base	\$441,783	\$2,133	(\$1,428)	(\$69)	(\$102)	(\$3,161)	\$1,062	\$0	\$0	\$0	\$0
28	Require Operating Inc (RB * Req Return)		\$2,133 \$188	(\$1,426)				\$1,062	\$0 \$0	\$0	\$0 \$0	\$0
29	Operating Income	\$38,877 \$30,022	\$27	(\$126) \$24	(\$6) \$1	(\$9) \$0	(\$278) (\$202)	(\$63)	(\$90)	(\$9)	\$160	\$0 \$1
30	Operating Income Deficiency	\$8,855	\$161	(\$150)	(\$7)		(\$202)	\$156	\$90	\$9	(\$160)	(\$1)
	Revenue Requirement	\$15,103	\$275	(\$256)	(\$12)	(\$9) (\$16)	(\$130)	\$266	\$153	\$16	(\$273)	(\$2)
31	Nevenue Requirement	\$13,103	\$213	(\$250)	(\$12)	(\$10)	(ψ130)	\$200	ψ133	ΨΙΟ	(ψ213)	(92)
Coh	lule M Items	42,771		(58)	(5)	(0)	(240)					
	dditions	136		(56)	(5)	(6)	(240)					
	Base Adjustment	441,783	2,133	(1,428)	(69)	(102)	(3,161)	1,062				
	of Debt	3.03%	3.03%	3.03%	3.03%	3.03%	3.03%	3.03%	3.03%	3.03%	3.03%	3.03%
Tax R		0.4137	0.4137	0.4137	0.4137	0.4137	0.4137	0.4137	0.4137	0.4137	0.4137	0.4137
Calcu	lation of Federal And State Income Tax											
	Operating Revenue	595,192	0	0	0	0	(269)	0	0	0	0	0
	Less Operating Expenses	508,787	0	0	0	0	(269)	0	153 (153)	16 (16)	(273) 273	(2)
	Operating Income before Adjustments Additions to Income	86,405 136	0	0	0	0	(269)	0	(153)	(16)	0	0
	Deductions from Income	57,416	0	(58)	(5)	(6)	(163)	0	0	0	0	0
	Debt Synchronization	13,386	65	(43)	(2)	(3)	(96)	32	0	ő	ő	ŏ
	Operating Income After Adjustments	15,739	(65)	101	7	9	(10)	(32)	(153)	(16)	273	2
	Federal & State Income Tax	6,511	(27)	42	3	4	(4)	(13)	(63)	(7)	113	1

Northern States Power Company, a Minnesota corporation Gas Operations - State of Minnesota INCOME STATEMENT SCHEDULES INCOME STATEMENT ADJUSTMENT SCHEDULES 2010 Unadjusted Test Year versus 2010 Adjusted Test Year (\$000's)

Docket No. G002/GR-09-1153 Exhibit\_\_\_(AEH-1), Schedule 3A Page 3 of 3

Line	Description	Incentive Compensation Adjustment 11	Employee Expense Adjustment 12	2009 Wage Increase Adjustment 13	Gas Affordability Program Adjustment 14	CIP Adjustment 15	CIP Incentive Bonus Removal 16	Economic Development Adjustment 17	Rate Case Expense Amortization 18	CWC 19	2010 Adjusted(1)
1	Operating Revenues Retail					(9,286)					\$571,205
2	Weather Impact Net Margin Adjustment Interdepartmental & Transportation					(3,200)					9,050
4	Other Operating						(1,027)				4,355
5 6	Gross Earnings Tax Total Operating Revenues	\$0	\$0	\$0	\$0	(\$9,286)	(\$1,027)	\$0	\$0	\$0	\$584,610
	<u>Expenses</u>										
7 8 9 10 11	Operating Expenses: Purchased Gas Other Production Transmission Distribution Customer Accounting				(20)						\$426,919 4,305 1,261 28,447 15,680
12 13	Customer Service & Information Administrative & General	(625)	(108)	236		(9,286)					5,610 16,629
14 15	Sales, Econ Dvlp & Other Total Operating Expenses	(\$625)	(\$108)	\$236	(\$20)	(\$9,286)	\$0	<u>3</u> \$3	\$0	\$0	31 \$498,882
16 17	Depreciation Amortizations	(4020)	(\$100)	4200	(\$20)	(40,200)	Ų	Ų	532	Ų.	\$32,857 532
	Taxes:										
18 19	Property Gross Earnings										\$12,776 0
20 21 22	Deferred Income Tax & ITC Federal & State Income Tax Payroll & Other	259	45	(98)	8	0	(425)	(1)	(220)	(5)	2,646 6,122 1,946
23	Total Taxes	\$259	\$45	(\$98)	\$8	\$0	(\$425)	(\$1)	(\$220)	(\$5)	\$23,490
24	Total Expenses	(\$366)	(\$63)	\$138	(\$12)	(\$9,286)	(\$425)	\$2	\$312	(\$5)	\$555,761
25	Allowance for Funds Used During Construction										\$414
26	Total Operating Income	\$366	\$63	(\$138)	\$12	\$0	(\$602)	(\$2)	(\$312)	\$5	\$29,263
	Revenue Requirement										
27 28	Total Rate Base Require Operating Inc (RB * Req Return)	\$0 \$0	\$0 \$0	\$0 \$0	\$0 \$0	\$0 \$0	\$0 \$0	\$0 \$0	\$0 \$0	\$379 \$33	\$440,597 \$38,773
29	Operating Income	\$366	\$63	(\$138)	\$12	\$0	(\$602)	(\$2)	(\$312)	\$5	\$29,263
30 31	Operating Income Deficiency  Revenue Requirement	(\$366) (\$625)	(\$63) (\$108)	\$138 \$236	(\$12) (\$20)	\$0 \$0	\$602 \$1,027	\$2 \$3	\$312 \$532	\$28 \$48	\$9,510 \$16,220
	dule M Items	-	-	-	-	-	-	-	-	-	-
	Additions Base Adjustment	-	-	-			-		-	379	440,597
Cost	of Debt	3.03%	3.03%	3.03%	3.03%	3.03%	3.03%	3.03%	3.03%	3.03%	3.03%
Tax F	Rate	0.4137	0.4137	0.4137	0.4137	0.4137	0.4137	0.4137	0.4137	0.4137	0.4137
Calcu	ulation of Federal And State Income Tax Operating Revenue Less Operating Expenses Operating Income before Adjustments Additions to Income	0 (625) 625 0	0 (108) 108 0	236 (236) 0	0 (20) 20 0	(9,286) (9,286) 0	(1,027) 0 (1,027) 0	0 3 (3) 0	0 0 0	0 0 0	584,610 498,882 85,728 0
	Deductions from Income Debt Synchronization	0	0	0	0	0	0	0	532 0	0 11	14,722 13,350
	Operating Income After Adjustments Federal & State Income Tax	625 259	108 45	(236) (98)	20 8	0	(1,027) (425)	(3) (1)	(532) (220)	(11) (5)	57,656 6,122

Docket No. G002/M-20-\_\_\_ 2020 SEP Petition Attachment G Page 1 of 3

## Revenue Requirements Category Descriptions

This attachment explains the three categories (Rate Base, Calculation of Return and Income Statement Items) and each component of these categories used to determine the Revenue Requirement. The calculation of the Revenue Requirement for the Cast Iron Pipe Replacement project is shown on Attachment D2.

## I. Rate Base

The following section explains each component of the Rate Base category and the rationale for including or excluding the cost.

Plant in Service - This is an addition to rate base. This category reflects the original cost of gas plant that has been put into service. In the specific case of the annual 2019-2020 test period plant in service for the natural gas Cast Iron Pipe Replacement project, the \$13,736,108 shown on Attachment D2 of this filing reflects the dollar value portion of the project in service as of June 30, 2020. Standard ratemaking methodology calls for the inclusion of this item in the determination of rate base.

**Book Depreciation Reserve -** This is a reduction to rate base. It reflects the accumulated recovery of the amount invested in plant in service. In the specific case of the 2019-2020 test period, book depreciation reserve for the natural gas Cast Iron Pipe Replacement project, the \$3,157,915 shown on Attachment D2 of this filing reflects the amount of the plant in service that has been recovered as of June 30, 2020, which results in a decrease to rate base. Standard ratemaking methodology calls for the inclusion of this credit balance (contra-asset) as a reduction in the determination of rate base.

Accumulated Deferred Taxes - This is a reduction to rate base. It reflects the tax timing differences between book and tax depreciation lives and other non-plant book/tax timing differences, multiplied by the tax rate. Over the life of an asset, the Accumulated Deferred Tax is zero. In the specific case of the 2019-2020 test period accumulated deferred taxes for the natural gas Cast Iron Pipe Replacement project, the \$1,091,345 shown on Attachment D2 of this filing reflects the accumulation of tax timing differences between book and tax depreciation through June 2020, which results in a decrease to rate base. Standard ratemaking methodology calls for the inclusion of this timing-related credit balance (contra-asset) as a reduction in the determination of rate base.

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Excess Accumulated Deferred Taxes – This is a reduction to rate base and resulted from the Tax Cut and Jobs Act (TCJA) legislation that changed the Federal Income Tax rate from 35% to 21% effective January 1, 2018. This balance represents the level of Accumulated Deferred Income Taxes that need to be returned to rate payers as a result of the tax rate change. Separation of this ratepayer liability from the deferred income tax liability to the government was made effective December 2017. The TCJA's normalization requirements require utilities to return the excess Deferred Income Taxes to ratepayers over the remaining life of the underlying asset using the Average Rate Assumption Method. In the specific case of the 2019-2020 test period excess deferred taxes for the natural gas Cast Iron Pipe Replacement project, the \$407,903 shown on Attachment D2 of this filing reflects the excess accumulated deferred tax that will be flowed back to customers as of June 2020, which results in a decrease to rate base. Standard ratemaking methodology calls for the inclusion of this timing-related credit balance (contra-asset) as a reduction in the determination of rate base.

## II. Calculation of Return

The following section explains both components of the Calculation of Return category. Note that for both items below, standard ratemaking methodology calls for the inclusion of these items in the calculation of revenue requirements.

**Debt Return -** This category reflects the return the Company is allowed in order to recover its weighted cost of debt for financing its capital investments. In the specific case of the annual 2019-2020 test period, the debt return for the natural gas Cast Iron Pipe Replacement project, the \$203,480 shown on Attachment D2 of this filing reflect the amount of debt return the Company is allowed based on the overall weighted cost of debt.

**Equity Return -** This category reflects the return the Company is allowed in order to recover its weighted cost of equity for financing its capital investments. In the specific case of the annual 2019-2020 test period, the equity return for the natural gas Cast Iron Pipe Replacement project, the \$441,339 shown on Attachment D2 of this filing reflect the amount of return on equity the Company is allowed based on the overall weighted cost of equity.<sup>1</sup>

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<sup>&</sup>lt;sup>1</sup> In the August 24, 2017 Order in Docket No. G002/M-17-174, we were ordered to use the return on equity approved in the Gas Utility Infrastructure Cost (GUIC) Rider (Docket No. G002/M-16-891) and the weighted cost of debt approved in the 2013 electric rate case (Docket No. E002/GR-13-868).

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#### III. Income Statement Items

The following section explains each component of the Income Statement Items category. Note that for each item below, standard ratemaking methodology calls for the inclusion of these items in the calculation of revenue requirements.

Property Taxes - This category reflects the estimated property taxes billed from local taxing authorities that the Company must pay based on the original cost of the Company's assets. Property taxes accrued are based on the original cost at December 31 from the prior year, and then are paid the following year. In the specific case of the annual 2019-2020 test period property tax amount for the natural gas Cast Iron Pipe Replacement project, the \$202,679 shown on Attachment D2 of this filing reflect one half of the amount of property taxes the Company is anticipating to accrue in calendar year 2019 for the plant in service as of December 31, 2019, plus one-half of calendar year 2020. We reflect one-half of each year, since the 2019-2020 SEP test period is split evenly across both calendar years.

**Book Depreciation -** This category reflects the monthly/annual depreciation expense that is accumulated in the book depreciation reserve defined in part a) subsection ii). In the specific case of the annual 2019-2020 test period, book depreciation for the natural gas Cast Iron Pipe Replacement project, the \$351,034 shown on Attachment D2 reflect the amount of plant in service that is being recovered through depreciation expense from July 2019 - June 2020 and included in the annual revenue requirement.

**Deferred Taxes -** This category reflects the monthly/annual deferred tax expense that is accumulated in the accumulated deferred reserve defined in part a) subsection iii). In the specific case of the annual 2019-2020 test period, deferred taxes for the natural gas Cast Iron Pipe Replacement project, the \$73,955 shown on Attachment D2 reflect the July 2019 - June 2020 tax timing difference when book expense differs from tax expense and is included in the annual revenue requirement.

**Current Taxes -** This category reflects the current income taxes the Company is anticipated to pay based on its taxable income. In the specific case of the annual 2019-2020 test period, current taxes for the natural gas Cast Iron Pipe Replacement project, the \$101,723 shown on Attachment D2 reflect the amount of current income taxes the Company is anticipating to pay as a result of the taxable income being generated by the Cast Iron Pipe Replacement project.

**GHG Summary Report** 

#### **Certification Statement:**

The designated representative or alternate designated representative must sign (i.e., agree to) this certification statement. If you are an agent and you click on "SUBMIT", you are not agreeing to the certification statement, but are submitting the certification statement on behalf of the designated representative or alternate designated representative who is agreeing to the certification statement. An agent is only authorized to make the electronic submission on behalf of the designated representative, not to sign (i.e., agree to) the certification statement.

Facility Name: Northern States Power Company, A Minnesota Corporation

Facility Identifier: 524615 Facility Reporting Year: 2018

Facility Location:

Address: 414 Nicollet Mall

City: Minneapolis State: MN

Postal Code: 55401

#### **Facility Site Details:**

CO2 equivalent emissions from facility subparts C-II, SS, and TT (metric tons): 55,895.5 CO2 equivalent emissions from supplier subparts LL-QQ (metric tons): 3,954,310.7 Biogenic CO2 emissions from facility subparts C-II, SS, and TT (metric tons): 0

Cogeneration Unit Emissions Indicator: N GHG Report Start Date: 2018-01-01 GHG Report End Date: 2018-12-31

**Description of Changes to Calculation Methodology:** 

Plant Code Indicator: N Primary NAICS Code: 221210 Second Primary NAICS Code:

#### **Parent Company Details:**

Parent Company Name: XCEL ENERGY

Address: 414 Nicollet Mall, Minneapolis, MN 55401

Percent Ownership Interest: 100

## **Subpart W: Petroleum and Natural Gas Systems**

#### **Gas Information Details**

Gas Name	Carbon Dioxide
<b>Gas Quantity</b>	999.2 (Metric Tons)
Own Result?	

Gas Name	Methane		
<b>Gas Quantity</b>	2,195.85	(Metric	Tons)
Own Result?			

Gas Name	Nitrous Oxide	
Gas Quantity	0 (Metric Tons)	
Own Result?		

#### SubpartWSummaryDetails:

Industry Segment Number	8
Industry Segment Name	Natural gas distribution [98.230(a)(8)]
Total Reported CO2 Emissions (mt CO2)	999.2

## GHG Summary Report

Total CO2e Emissions (mt CO2e)	55895.3
Total Reported CH4 Emissions (mt CH4)	2195.85
Total Reported N2O Emissions (mt N2O)	0.000

## SubpartWSourceReportingFormRowDetails:

SubpartWSourceReportingFormRowDetails:		
Source Reporting Form	Onshore Production [98.236(aa)(1)]	
Required for Selected Industry Segment	No	
Source Reporting Form	Facility Overview [98.236(aa)(2-11)]	
Required for Selected Industry Segment	Yes	
Source Reporting Form	Natural Gas Pneumatic Devices [98.236(b)]	
Required for Selected Industry Segment	No	
Total Reported CO2 Emissions (mt CO2)	0.0	
Total Reported CH4 Emissions (mt CH4)	0.00	
Source Reporting Form	Natural Gas Driven Pneumatic Pumps [98.236(c)]	
Required for Selected Industry Segment	No	
Total Reported CO2 Emissions (mt CO2)	0.0	
Total Reported CH4 Emissions (mt CH4)	0.00	
Source Reporting Form	Acid Gas Removal Units [98.236(d)]	
Required for Selected Industry Segment	No	
Total Reported CO2 Emissions (mt CO2)	0.0	
Source Reporting Form	Dehydrators [98.236(e)]	
Required for Selected Industry Segment	No	
Total Reported CO2 Emissions (mt CO2)	0.0	
Total Reported CH4 Emissions (mt CH4)	0.00	
Total Reported N2O Emissions (mt N2O)	0.000	
Source Reporting Form	Well Venting for Liquids Unloading [98.236(f)]	
Required for Selected Industry Segment	No	
Total Reported CO2 Emissions (mt CO2)	0.0	
Total Reported CH4 Emissions (mt CH4)	0.00	
Source Reporting Form	Completions and Workovers with Hydraulic Fracturing [98.236(g)]	
Required for Selected Industry Segment	No	
Total Reported CO2 Emissions (mt CO2)	0.0	
Total Reported CH4 Emissions (mt CH4)	0.00	
Total Reported N2O Emissions (mt N2O)	0.000	
Source Reporting Form	Completions and Workovers without Hydraulic Fracturing [98.236(h)]	
Required for Selected Industry Segment	No	
Total Reported CO2 Emissions (mt CO2)	0.0	
Total Reported CH4 Emissions (mt CH4)	0.00	
Total Reported N2O Emissions (mt N2O)	0.000	
Source Reporting Form	Blowdown Vent Stacks [98.236(i)]	
Required for Selected Industry Segment	No	
Total Reported CO2 Emissions (mt CO2)	0.0	
Total Reported CH4 Emissions (mt CH4)	0.00	
Source Reporting Form	Atmospheric Storage Tanks [98.236(j)]	
Required for Selected Industry Segment	No	
Total Reported CO2 Emissions (mt CO2)	0.0	
Total Reported CH4 Emissions (mt CH4)	0.00	

Total Reported N2O Emissions (mt N2O)	0.000
Source Reporting Form	Transmission Storage Tanks [98.236(k)]
Required for Selected Industry Segment	No
Total Reported CO2 Emissions (mt CO2)	0.0
Total Reported CH4 Emissions (mt CH4)	0.00
Total Reported N2O Emissions (mt N2O)	0.000
Source Reporting Form	Well Testing [98.236(I)]
Required for Selected Industry Segment	No
Total Reported CO2 Emissions (mt CO2)	0.0
Total Reported CH4 Emissions (mt CH4)	0.00
Total Reported N2O Emissions (mt N2O)	0.000
Source Reporting Form	Associated Gas Venting and Flaring [98.236(m)]
Required for Selected Industry Segment	No
Total Reported CO2 Emissions (mt CO2)	0.0
Total Reported CH4 Emissions (mt CH4)	0.00
Total Reported N2O Emissions (mt N2O)	0.000
Source Reporting Form	Flare Stacks [98.236(n)]
Required for Selected Industry Segment	No No
Total Reported CO2 Emissions (mt CO2)	0.0
Total Reported CH4 Emissions (mt CH4)	0.00
Total Reported N2O Emissions (mt N2O)	0.000
Source Reporting Form	Centrifugal Compressors [98.236(o)]
Required for Selected Industry Segment	No
Total Reported CO2 Emissions (mt CO2)	0.0
Total Reported CH4 Emissions (mt CH4)	0.00
Total Reported N2O Emissions (mt N2O)	0.000
Source Reporting Form	Reciprocating Compressors [98.236(p)] No
Required for Selected Industry Segment	
Total Reported CO2 Emissions (mt CO2)	0.0
Total Reported CH4 Emissions (mt CH4)	0.00
Total Reported N2O Emissions (mt N2O)	0.000
Source Reporting Form	Equipment Leaks Surveys and Population Counts [98.236(q,r)]
Required for Selected Industry Segment	Yes
Total Reported CO2 Emissions (mt CO2)	66.2
Total Reported CH4 Emissions (mt CH4)	2195.85
Source Reporting Form	Offshore Petroleum and Natural Gas Production [98.236(s)]
Required for Selected Industry Segment	No
Total Reported CO2 Emissions (mt CO2)	0.0
Total Reported CH4 Emissions (mt CH4)	0.00
Total Reported N2O Emissions (mt N2O)	0.000
Source Reporting Form	Enhanced Oil Recovery Injection Pumps [98.236(w)]
Required for Selected Industry Segment	No
Total Reported CO2 Emissions (mt CO2)	0.0
Source Reporting Form	Enhanced Oil Recovery Hydrocarbon Liquids [98.236(x)]
Required for Selected Industry Segment	No
Total Reported CO2 Emissions (mt CO2)	0.0
, , ,	Combustion Equipment at Onshore

Source Reporting Form	Petroleum and Natural Gas Production Facilities, Onshore Petroleum and Natural Gas Gathering and Boosting Facilities, and Natural gas Distribution Facilities [98.236(z)]
Required for Selected Industry Segment	Yes
Total Reported CO2 Emissions (mt CO2)	933.0
Total Reported CH4 Emissions (mt CH4)	0.00
Total Reported N2O Emissions (mt N2O)	0.000

# FacilityOverviewDetails:

FacilityOverviewNaturalGasDistributionRowDetails:

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Quantity of natural gas received at all custody transfer stations in the calendar year (thousand standard cubic feet) [98.236(aa)(9)(i)]	109120901
Quantity of natural gas withdrawn from in-system storage in the calendar year (thousand standard cubic feet) [98.236(aa)(9)(ii)]	338120
Quantity of natural gas added to in-system storage in the calendar year (thousand standard cubic feet) [98.236(aa)(9)(iii)]	
Quantity of natural gas delivered to end users (thousand standard cubic feet) [98.236(aa)(9)(iv)]	112951344
Quantity of natural gas transferred to third parties such as other LDCs or pipelines (thousand standard cubic feet) [98.236(aa)(9)(v)]	0
Quantity of natural gas consumed by the LDC for operational purposes (thousand standard cubic feet) [98.236(aa)(9)(vi)]	46663
Estimated quantity of gas stolen in the calendar year (thousand standard cubic feet) [98.236(aa)(9)(vii)]	29726.168

Other Emissions From Equipment Leaks Details:

other Emissions Formedalpment Estates of the second	
mt CO2	66.2
mt CH4	2195.85
Did this facility use leak surveys to calculate emissions from equipment leaks in accordance with 98.232 [per 98.236(q)]?	Yes
Did this facility use population counts to calculate emissions from equipment leaks in accordance with 98.232 [per 98.236(r)]?	Yes
Were missing data procedures used for any parameters to calculate GHG emissions? [98.235]	No
Number of complete equipment leak surveys performed during the calendar year [98.236(q)(1)(i)]	1
For Natural gas distribution facilities conducting multi-year surveys, number of years in the leak survey cycle [98.236(q)(1)(ii)]	1
Optical gas imaging instrument as specified in §60.18 [98.234(a)(1)]	No
Method 21 [98.234(a)(2)]	Yes
Infrared laser beam illuminated instrument [98.234(a)(3)]	No
Acoustic leak detection device [98.234(a)(5)]	No
Optical gas imaging instrument as specified in §60.5397a [98.234(a)(6)]	No
Method 21 as specified in §60.5397a [98.234(a)(7)]	No

Total number of above grade T-D transfer stations surveyed in the calendar year [98.236(q)(3)(i)]	43
Number of meter/regulator runs at above grade T-D transfer stations surveyed in the calendar year, CountMR,y [98.236(q)(3)(ii)]	56
Average time meter/regulator runs surveyed in calendar year were operational, Average of calendar year Tw,y (hours) [98.236(q)(3)(iii)]	8760
Number of above grade T-D transfer stations surveyed in current leak survey cycle [98.236(q)(3)(iv)]	43
Number of meter/regulator runs at above grade T-D transfer stations surveyed in current leak survey cycle, Sum of CountMR,y [98.236(q)(3)(v)]	56
Average time that meter/regulator runs surveyed in the current leak survey cycle were operational, Average of current survey Tw,y (hours) [98.236(q)(3)(vi)]	8760
Meter/regulator run CO2 emission factor based on all surveyed T-D transfer stations in current leak cycle, Average of current survey EFS,MR,i (standard cubic feet per operational hour of all meter/regulator runs) [98.236(q)(3)(vii)]	0.00539
Meter/regulator run CH4 emission factor based on all surveyed T-D transfer stations in current leak cycle, Average of current survey EFS,MR,i (standard cubic feet per operational hour of all meter/regulator runs) [98.236(q)(3)(viii)]	
Does the facility perform equipment leak surveys across a multiple year leak survey cycle (Yes/No) [98.236(q)(3)(ix)]	No
Number of above grade T-D transfer stations at the facility [98.236(r)(2)(i)]	43
Number of above grade metering-regulating stations that are not T-D transfer stations [98.236(r)(2)(ii)]	206
Total number of meter/regulator runs at above grade metering-regulating stations that are not above grade T-D transfer stations, CountMR [98.236(r)(2)(iii)]	279
Average estimated time that each meter/regulator run at above grade metering-regulating stations that are not above grade T-D transfer stations was operational in the calendar year, Tw,avg (hours) [98.236(r)(2)(iv)]	8760
Annual CO2 emissions from above grade metering-regulating stations that are not above grade T-D transfer stations (mt CO2) $[98.236(r)(2)(v)(A)]$	0.6934246
Annual CH4 emissions from above grade metering-regulating stations that are not above grade T-D transfer stations (mt CH4) [98.236(r)(2)(v)(B)]	23.0102875

#### GasDistributionEmissionsFactorsRowDetails:

GasDistributionemissionsractorskowdetails.	
Component Type [98.236(q)(2)(i)]	Transmission-Distribution Transfer Station Components, Gas Service - Connector
Total number of surveyed component type identified as leaking, xp $[98.236(q)(2)(ii)]$	0
Average time the surveyed components are assumed to be leaking and operational, Tp,z (hours) [98.236(q)(2)(iii)]	0
CO2 Emissions (surveyed components identified as leaking only) (mt CO2) [98.236(q)(2)(iv)]	0
CH4 Emissions (surveyed components identified as leaking only) (mt CH4) [98.236(q)(2)(v)]	0
	Transmission-Distribution Transfer Station

Component Type [98.236(q)(2)(i)]	Components, Gas Service - Block Valve
Total number of surveyed component type identified as leaking, xp [98.236(q)(2)(ii)]	1
Average time the surveyed components are assumed to be leaking and operational, Tp,z (hours) [98.236(q)(2)(iii)]	8760
CO2 Emissions (surveyed components identified as leaking only) (mt CO2) [98.236(q)(2)(iv)]	0.0028232
CH4 Emissions (surveyed components identified as leaking only) (mt CH4) [98.236(q)(2)(v)]	0.0936829
Component Type [98.236(q)(2)(i)]	Transmission-Distribution Transfer Station Components, Gas Service - Control Valve
Total number of surveyed component type identified as leaking, xp [98.236(q)(2)(ii)]	
Average time the surveyed components are assumed to be leaking and operational, Tp,z (hours) [98.236(q)(2)(iii)]	0
CO2 Emissions (surveyed components identified as leaking only) (mt CO2) [98.236(q)(2)(iv)]	0
CH4 Emissions (surveyed components identified as leaking only) (mt CH4) [98.236(q)(2)(v)]	0
Component Type [98.236(q)(2)(i)]	Transmission-Distribution Transfer Station Components, Gas Service - Pressure Relief Valve
Total number of surveyed component type identified as leaking, xp [98.236(q)(2)(ii)]	
Average time the surveyed components are assumed to be leaking and operational, Tp,z (hours) [98.236(q)(2)(iii)]	0
CO2 Emissions (surveyed components identified as leaking only) (mt CO2) [98.236(q)(2)(iv)]	0
CH4 Emissions (surveyed components identified as leaking only) (mt CH4) [98.236(q)(2)(v)]	0
Component Type [98.236(q)(2)(i)]	Transmission-Distribution Transfer Station Components, Gas Service - Orifice Meter
Total number of surveyed component type identified as leaking, xp [98.236(q)(2)(ii)]	
Average time the surveyed components are assumed to be leaking and operational, Tp,z (hours) [98.236(q)(2)(iii)]	0
CO2 Emissions (surveyed components identified as leaking only) (mt CO2) [98.236(q)(2)(iv)]	0
CH4 Emissions (surveyed components identified as leaking only) (mt CH4) [98.236(q)(2)(v)]	0
Component Type [98.236(q)(2)(i)]	Transmission-Distribution Transfer Station Components, Gas Service - Regulator
Total number of surveyed component type identified as leaking, xp [98.236(q)(2)(ii)]	
Average time the surveyed components are assumed to be leaking and operational, Tp,z (hours) [98.236(q)(2)(iii)]	8760
CO2 Emissions (surveyed components identified as leaking only) (mt CO2) [98.236(q)(2)(iv)]	0.0039129
CH4 Emissions (surveyed components identified as leaking only) (mt CH4) [98.236(q)(2)(v)]	0.1298442
Component Type [98.236(q)(2)(i)]	Transmission-Distribution Transfer Station Components, Gas Service - Open-ended line
Total number of surveyed component type identified as leaking, xp [98.236(q)(2)(ii)]	1
Average time the surveyed components are assumed to be leaking	

and operational, Tp,z (hours) [98.236(q)(2)(iii)]	8760
CO2 Emissions (surveyed components identified as leaking only) (mt CO2) [98.236(q)(2)(iv)]	0.1324459
CH4 Emissions (surveyed components identified as leaking only) (mt CH4) [98.236(q)(2)(v)]	4.3950252

#### Gas Distribution TDE stimating Emissions Row Details:

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Emission Source Type (Eq. W-32A) [98.232] [98.233(r)(1)]	Below Grade T-D Station, Gas Service, Inlet Pressure > 300 psig
Total number of emission source type, Counte [98.236(r)(1)(ii)]	0
Average estimated time that the emission source type was operational in the calendar year, Te (hours) [98.236(r)(1)(iii)]	8760
CO2 Emissions (mt CO2) [98.236(r)(1)(iv)]	0
CH4 Emissions (mt CH4) [98.236(r)(1)(v)]	0
Emission Source Type (Eq. W-32A) [98.232] [98.233(r)(1)]	Below Grade T-D Station, Gas Service, Inlet Pressure 100 to 300 psig
Total number of emission source type, Counte [98.236(r)(1)(ii)]	6
Average estimated time that the emission source type was operational in the calendar year, Te (hours) [98.236(r)(1)(iii)]	8760
CO2 Emissions (mt CO2) [98.236(r)(1)(iv)]	0.0060822
CH4 Emissions (mt CH4) [98.236(r)(1)(v)]	0.2018304
Emission Source Type (Eq. W-32A) [98.232] [98.233(r)(1)]	Below Grade T-D Station, Gas Service, Inlet Pressure < 100 psig
Total number of emission source type, Counte [98.236(r)(1)(ii)]	0
Average estimated time that the emission source type was operational in the calendar year, Te (hours) [98.236(r)(1)(iii)]	8760
CO2 Emissions (mt CO2) [98.236(r)(1)(iv)]	0
CH4 Emissions (mt CH4) [98.236(r)(1)(v)]	0

#### GasDistributionMREstimatingEmissionsRowDetails:

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Emission Source Type (Eq. W-32A) [98.232] [98.233(r)(1)]	Below Grade M-R Station, Gas Service, Inlet Pressure > 300 psig
Total number of emission source type, Counte [98.236(r)(1)(ii)]	0
Average estimated time that the emission source type was operational in the calendar year, Te (hours) [98.236(r)(1)(iii)]	8760
CO2 Emissions (mt CO2) [98.236(r)(1)(iv)]	0
CH4 Emissions (mt CH4) [98.236(r)(1)(v)]	0
Emission Source Type (Eq. W-32A) [98.232] [98.233(r)(1)]	Below Grade M-R Station, Gas Service, Inlet Pressure 100 to 300 psig
Total number of emission source type, Counte [98.236(r)(1)(ii)]	35
Average estimated time that the emission source type was operational in the calendar year, Te (hours) [98.236(r)(1)(iii)]	8760
CO2 Emissions (mt CO2) [98.236(r)(1)(iv)]	0.0354798
CH4 Emissions (mt CH4) [98.236(r)(1)(v)]	1.177344
Emission Source Type (Eq. W-32A) [98.232] [98.233(r)(1)]	Below Grade M-R Station, Gas Service, Inlet Pressure < 100 psig
Total number of emission source type, Counte [98.236(r)(1)(ii)]	29
Average estimated time that the emission source type was operational in the calendar year, Te (hours) [98.236(r)(1)(iii)]	8760
CO2 Emissions (mt CO2) [98.236(r)(1)(iv)]	0.0146988
CH4 Emissions (mt CH4) [98.236(r)(1)(v)]	0.4877568

# Main Gas Distribution Estimating Emissions Row Details:

Emission Source Type (Eq. W-32A) [98.232] [98.233(r)(1)]	Distribution Mains, Gas Service - Unprotected Steel
Total number of emission source type, Counte [98.236(r)(1)(ii)]	71.2
Average estimated time that the emission source type was operational in the calendar year, Te (hours) [98.236(r)(1)(iii)]	8760
CO2 Emissions (mt CO2) [98.236(r)(1)(iv)]	4.5
CH4 Emissions (mt CH4) [98.236(r)(1)(v)]	150.65
Emission Source Type (Eq. W-32A) [98.232] [98.233(r)(1)]	Distribution Mains, Gas Service - Protected Steel
Total number of emission source type, Counte [98.236(r)(1)(ii)]	857.4
Average estimated time that the emission source type was operational in the calendar year, Te (hours) [98.236(r)(1)(iii)]	8760
CO2 Emissions (mt CO2) [98.236(r)(1)(iv)]	1.521017
CH4 Emissions (mt CH4) [98.236(r)(1)(v)]	50.4727373
Emission Source Type (Eq. W-32A) [98.232] [98.233(r)(1)]	Distribution Mains, Gas Service - Plastic
Total number of emission source type, Counte [98.236(r)(1)(ii)]	8449.8
Average estimated time that the emission source type was operational in the calendar year, Te (hours) [98.236(r)(1)(iii)]	8760
CO2 Emissions (mt CO2) [98.236(r)(1)(iv)]	48.3957705
CH4 Emissions (mt CH4) [98.236(r)(1)(v)]	1605.9433006
Emission Source Type (Eq. W-32A) [98.232] [98.233(r)(1)]	Distribution Mains, Gas Service - Cast Iron
Total number of emission source type, Counte [98.236(r)(1)(ii)]	0
Average estimated time that the emission source type was operational in the calendar year, Te (hours) [98.236(r)(1)(iii)]	8760
CO2 Emissions (mt CO2) [98.236(r)(1)(iv)]	0
CH4 Emissions (mt CH4) [98.236(r)(1)(v)]	0

#### ServicesGasDistributionEstimatingEmissionsRowDetails:

services das distribution estimating en il ssions kow details.	
Emission Source Type (Eq. W-32A) [98.232] [98.233(r)(1)]	Distribution Services, Gas Service - Unprotected Steel
Total number of emission source type, Counte [98.236(r)(1)(ii)]	8176
Average estimated time that the emission source type was operational in the calendar year, Te (hours) [98.236(r)(1)(iii)]	8760
CO2 Emissions (mt CO2) [98.236(r)(1)(iv)]	7.9
CH4 Emissions (mt CH4) [98.236(r)(1)(v)]	261.28
Emission Source Type (Eq. W-32A) [98.232] [98.233(r)(1)]	Distribution Services, Gas Service - Protected Steel
Total number of emission source type, Counte [98.236(r)(1)(ii)]	6888
Average estimated time that the emission source type was operational in the calendar year, Te (hours) [98.236(r)(1)(iii)]	8760
CO2 Emissions (mt CO2) [98.236(r)(1)(iv)]	0.6982415
CH4 Emissions (mt CH4) [98.236(r)(1)(v)]	23.1701299
Emission Source Type (Eq. W-32A) [98.232] [98.233(r)(1)]	Distribution Services, Gas Service - Plastic
Total number of emission source type, Counte [98.236(r)(1)(ii)]	423367
Average estimated time that the emission source type was operational in the calendar year, Te (hours) [98.236(r)(1)(iii)]	8760
CO2 Emissions (mt CO2) [98.236(r)(1)(iv)]	2.1458509
CH4 Emissions (mt CH4) [98.236(r)(1)(v)]	71.2069425
Emission Source Type (Eq. W-32A) [98.232] [98.233(r)(1)]	Distribution Services, Gas Service - Copper
Total number of emission source type, Counte [98.236(r)(1)(ii)]	719

Average estimated time that the emission source type was operational in the calendar year, Te (hours) [98.236(r)(1)(iii)]	8760
CO2 Emissions (mt CO2) [98.236(r)(1)(iv)]	0.1093283
CH4 Emissions (mt CH4) [98.236(r)(1)(v)]	3.6279014

#### CombustionEmissionsDetails:

mt CO2	933.0
mt CH4	0.00
mt N2O	0.000
Does the Facility have combustion units subject to reporting under 98.232?	Yes
Were missing data procedures used for any parameters to calculate GHG emissions? [98.235]	No
Are there external fuel combustion units with a rated heat capacity less than or equal to 5 mmBtu/hr? [98.236(z)(1)(i)]	Yes
Are there internal fuel combustion units that are not compressor-drivers, with a rated heat capacity less than or equal to 1 mmBtu/hr? [98.236(z)(1)(i)]	No
Total number of combustion units meeting 98.236(z)(1) descriptions	6
Are there external fuel combustion units with a rated heat capacity greater than 5 mmBtu/hr? [98.236(z)(2)(i)]	Yes
Are there internal fuel combustion units that are not compressor-drivers, with a rated heat capacity greater than 1 mmBtu/hr? [98.236(z)(2)(i)]	No
Are there Internal fuel combustion units of any heat capacity that are compressor-drivers? [98.236(z)(2)(i)]	No

#### LargeCombustionUnitEmissionsRowDetails:

Type of combustion unit [98.236(z)(2)(i)]	External fuel combustion units with a rated heat capacity greater than 5 mmBtu/hr
Type of fuel combusted [98.236(z)(2)(ii)]	Natural gas (pipeline quality)
Quantity of fuel combusted in calendar year [98.236(z)(2)(iii)]	17144
Unit of measure [98.236(z)(2)(iii)	thousand standard cubic feet
CO2 Emissions (mt CO2) [98.236(z)(2)(iv)]	933
CH4 Emissions (mt CH4) [98.236(z)(2)(v)]	0
N2O Emissions (mt N2O) [98.236(z)(2)(vi)]	0

# Subpart NN: Suppliers of Natural Gas and Natural Gas Liquids

#### **Gas Information Details**

Gas Name	Gas Quantity	Own Result?
Carbon Dioxide	3954310.7 (Metric Tons)	

# US State or Territory Covered MN

Name	Value		Times Substituted
AnnualVolumeGasReceived	109120901	(Mscf)	0
Industry Standard for Volu	me:		

ANSI standard
Other Industry Standard for Volume:

Name	Value	Times Substituted
AnnualVolumeGasStored	380728 (Mscf)	0

Name	Value	Times Substituted
<b>AnnualVolumeLNGforDelivery</b>	338120 (Mscf)	0

Name	Value	Times Substituted
AnnualVolumeGasfromStorageforDelivery	0 (Mscf)	0

Name	Value	Times Substituted
AnnualVolumeGasDeliveredtoOtherLDC/Pipe	0 (Mscf)	0

Name	Value	Times Substituted
AnnualVolumeGasBypassedCityGate	0 (Mscf)	0

Name	Value	Own Result?
NN1CO2MassTotal	5940493.8 (Metric Tons)	N

Name	Value	Own Result?
NN3CO2MassTotal	0 (Metric Tons)	Ν

Name	Value	Own Result?
NN4CO2MassTotal	1983865.2 (Metric Tons)	N

Name	Value	Own Result?
NN5aCO2MassTotal	2317.9 (Metric Tons)	N

Name	Value	Own Result?
NN5bCO2MassTotal	0 (Metric Tons)	N

# NN1 Equation Details:

Name	Value	Times Substituted
DevelopedHHV	1.026 (MMBtu/Mscf)	

Name	Value	Times Substituted
DevelopedEF	53.06 (kg CO2/MMBtu)	

Industry Standard for HHV: Other Industry Standard for HHV:

Industry Standard for EF: Other Industry Standard for EF:

# NN3 Equation Details:

Name	Value	Times Substituted
DevelopedEF	0.0544 (MT CO2/Mscf)	

Industry Standard for EF:

#### NN4 Equation Details:

Name	Value	Times Substituted
DevelopedEF	0.0544 (MT CO2/Mscf)	

#### Industry Standard for EF:

#### NN5a Equation Details:

Name	Value	Times Substituted
DevelopedEF	0.0544 (MT CO2/Ms	cf)

Industry Standard for EF:

#### NN5b Equation Details:

Name	Value	Times Substituted
DevelopedEF	0.0544 (MT CO2/Mscf)	

Industry Standard for EF:

Large End-User Details

Name: St Paul Park Refining Co LLC

Address: 360 3rd Ave W, Saint Paul Park, MN, 55071

Meter Number: 0033120162, 000013080128

EIA Number:

Total quantity of natural gas reported is the total quantity delivered to: Specific meter located at the

facility

Name	Value	
AnnualVolumeGasDeliveredtoMeter	597220	(Mscf)

Name: Mom Brands Company LLC

Address: 705 5th St W, Northfield, MN, 55057

Meter Number: 711058, 10011686

EIA Number:

Total quantity of natural gas reported is the total quantity delivered to: Large end-user's facility

Name	Value	
AnnualVolumeGasDeliveredtoMeter	688140	(Mscf)

Name: Gerdeau Ameristeel US Inc - MN

Address: 1678 Red Rock Road, St. Paul, MN, 55119

Meter Number: 1460104

EIA Number:

Total quantity of natural gas reported is the total quantity delivered to: Specific meter located at the

facility

Name	Value	
AnnualVolumeGasDeliveredtoMeter	4204980.9	(Mscf)

Name: Waldorf Corporation/Rock-Tenn

Address: 2241 Wabash Ave, St. Paul, MN, 55114

Meter Number: 477095, 00000684668

EIA Number:

Total quantity of natural gas reported is the total quantity delivered to: Large end-user's facility

Name	Value
AnnualVolumeGasDeliveredtoMeter	2667902 (Mscf)

Name: American Crystal Sugar - EGF

Address: 1000 Business Highway 2, East Grand Forks, MN, 56721

Meter Number: 684836, 000000520587

EIA Number:

Total quantity of natural gas reported is the total quantity delivered to: Large end-user's facility

Name	Value
AnnualVolumeGasDeliveredtoMeter	1259147.7 (Mscf)

Name: 3M - MN

Address: 2400 Conway St, Maplewood, MN, 55119

Meter Number: 1316947

EIA Number:

Total quantity of natural gas reported is the total quantity delivered to: Specific meter located at the

facility.

Name	Value
AnnualVolumeGasDeliveredtoMeter	1652906 (Mscf)

Name: District Energy of St Paul

Address: 76 Kellogg Blvd, St. Paul, MN, 55102

Meter Number: 000000296621

EIA Number:

Total quantity of natural gas reported is the total quantity delivered to: Specific meter located at the

facility

Name Value
AnnualVolumeGasDeliveredtoMeter 610104.7 (Mscf)

Name: University of Minnesota

Address: 1952 Commonwealth Ave, Falcon Heights, MN, 55108

Meter Number: 457488, 628573

EIA Number:

Total quantity of natural gas reported is the total quantity delivered to: Large end-user's facility

Name	Value	
AnnualVolumeGasDeliveredtoMeter	516518	(Mscf)

Name: High Bridge Combined Cycle Plant

Address: 155 Randolph Ave, St. Paul, MN, 55102

Meter Number: 925955, 684727

EIA Number: 1912

Total quantity of natural gas reported is the total quantity delivered to: Large end-user's facility

Name	Value	
AnnualVolumeGasDeliveredtoMeter	14886640	(Mscf)

Name: Black Dog Cedar Lake Control

Address: 1400 Black Dog Rd, Burnsville, MN, 55379

Meter Number: 17H009887

EIA Number:

Total quantity of natural gas reported is the total quantity delivered to: Specific meter located at the

facility

Name	Value	
AnnualVolumeGasDeliveredtoMeter	7084407	(Mscf)

Name: Blue Lake Plant

Address: 1200 70th St S, Shakopee, MN, 55379

Meter Number: 3980

EIA Number:

Total quantity of natural gas reported is the total quantity delivered to: Specific meter located at the

facility

Name	Value	
AnnualVolumeGasDeliveredtoMeter	1051088	(Mscf)

Name: American Crystal Sugar

Address: 2500 11th St N, Moorhead, MN, 56560

Meter Number: 0000A7055003

EIA Number:

Total quantity of natural gas reported is the total quantity delivered to: Specific meter located at the

facility

Name	Value	
AnnualVolumeGasDeliveredtoMeter	653063.2	(Mscf)

Name: St Paul Cogeneration CHP

Address: 76 Kellogg Blvd, St Paul, MN, 55102

Meter Number: 000000960257

EIA Number:

Total quantity of natural gas reported is the total quantity delivered to: Specific meter located at the

facility

Name	Value	
AnnualVolumeGasDeliveredtoMeter	595992.4	(Mscf)

#### NG Delivery Details

Name: Residential consumers

Name	Value	
VolumeofNaturalGas	39229258	(Mscf)

Name: Commercial consumers

Name	Value
VolumeofNaturalGas	22989032 (Mscf)

Name: Industrial consumers

Name	Value				
VolumeofNaturalGas	25917146	(Mscf)			

Name: Electricity generating facilities

Name	Value				
VolumeofNaturalGas	24815908	(Mscf)			

# **CERTIFICATE OF SERVICE**

- I, Paget Pengelly, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.
  - <u>xx</u> by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota
  - xx electronic filing

# DOCKET NO. G002/M-19-200 Miscellaneous Natural Gas Service List

Dated this 28th day of February 2020

/s/		
Paget Pengelly		

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth,  MN  558022191	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd.  St, Louis,  MO 63119-2044	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
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	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Sharon	Ferguson	sharon.ferguson@state.mn .us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Edward	Garvey	edward.garvey@AESLcons ulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Todd J.	Guerrero	todd.guerrero@kutakrock.c om	Kutak Rock LLP	Suite 1750 220 South Sixth Stree Minneapolis, MN 554021425	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Michael	Норре	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Linda	Jensen	linda.s.jensen@ag.state.m n.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Johnson	Rick.Johnson@lawmoss.co m	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Michael	Krikava	mkrikava@taftlaw.com	TAFT Stettinius & Hollister, LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Peder	Larson	plarson@larkinhoffman.co m	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Andrew	Moratzka	andrew.moratzka@stoel.co m	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
David	Niles	david.niles@avantenergy.c om	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas

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Richard	Savelkoul	rsavelkoul@martinsquires.c om	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul,  MN  55101	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
James M	Strommen	jstrommen@kennedy- graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470  Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Lynnette	Sweet	Regulatory.records@xcele nergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_19-200_M-19-200
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_19-200_M-19-200
Mara	Ascheman	mara.k.ascheman@xcelen ergy.com	Xcel Energy	414 Nicollet Mall FI 5  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-200_M-19-200
James J.	Bertrand	james.bertrand@stinson.co m	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-200_M-19-200
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St, Louis, MO 63119-2044	Electronic Service	No	OFF_SL_19-200_M-19-200
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_19-200_M-19-200
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_19-200_M-19-200
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_19-200_M-19-200
Edward	Garvey	edward.garvey@AESLcons ulting.com	AESL Consulting	32 Lawton St  Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_19-200_M-19-200
Todd J.	Guerrero	todd.guerrero@kutakrock.c om	Kutak Rock LLP	Suite 1750 220 South Sixth Stree Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_19-200_M-19-200

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_19-200_M-19-200
Michael	Норре	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Electronic Service	No	OFF_SL_19-200_M-19-200
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave.  Marathon, FL 33050	Electronic Service	No	OFF_SL_19-200_M-19-200
Linda	Jensen	linda.s.jensen@ag.state.m n.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	No	OFF_SL_19-200_M-19-200
Richard	Johnson	Rick.Johnson@lawmoss.co m	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-200_M-19-200
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-200_M-19-200
Mark J.	Kaufman	mkaufman@ibewlocal949.o rg	IBEW Local Union 949	12908 Nicollet Avenue South  Burnsville, MN 55337	Electronic Service	No	OFF_SL_19-200_M-19-200
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln  St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_19-200_M-19-200
Michael	Krikava	mkrikava@taftlaw.com	TAFT Stettinius & Hollister, LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-200_M-19-200

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Douglas	Larson	dlarson@dakotaelectric.co m	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_19-200_M-19-200
Peder	Larson	plarson@larkinhoffman.co m	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_19-200_M-19-200
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	No	OFF_SL_19-200_M-19-200
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_19-200_M-19-200
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_19-200_M-19-200
Andrew	Moratzka	andrew.moratzka@stoel.co m	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-200_M-19-200
David	Niles	david.niles@avantenergy.c om	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-200_M-19-200
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-200_M-19-200
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-200_M-19-200
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_19-200_M-19-200

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ken	Smith	ken.smith@districtenergy.c om	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-200_M-19-200
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Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_19-200_M-19-200
Lynnette	Sweet	Regulatory.records@xcele nergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-200_M-19-200
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-200_M-19-200