



414 Nicollet Mall
Minneapolis, MN 55401

October 14, 2019

—Via Electronic Filing—

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: REPLY COMMENTS
CHANGES IN CONTRACT DEMAND ENTITLEMENTS
DOCKET NO. G002/M-19-498

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits this Reply to the October 3, 2019 Comments of the Minnesota Department of Commerce, Division of Energy Resources in the above referenced docket.

We appreciate the Department's thorough review of the Company's Contract Demand Entitlements Petition. In this Reply, we provide responses to the Comments of the Department.

REPLY

A. Northern Natural Gas & Viking Gas Rate Changes

We appreciate and agree with the Department's concerns regarding the implementation of the proposed rates filed in Northern Natural Gas Company and Viking Gas Transmission's respective rate cases. As the Department notes, each pipeline's proposed rates have been suspended by the Federal Energy Regulatory Commission to be effective January 1, 2020. As such, we will provide two expected costs with our supplemental filing; one detailing the costs at current rates effective November 1, 2019 through December 31, 2019, and another to be effective on the implementation of the pipelines' proposed rates effective January 1, 2020 and going forward.

B. Great Lakes Gas Transmission

The Department asked that we clarify the effective and expiration dates of the Great Lakes Gas Transmission agreements. We confirm the Department's general understanding of the Great Lakes Gas Transmission contracts; we consolidated three contracts with Great LakesGas Transmission into the renewal of two contracts for one-year terms each. The contract consolidation and the renewals are effective April 1, 2020 with an expiration of March 31, 2021. The original effective date of the agreements was April 1, 2019 resulting in a two-year term, when including the renewal period.

CONCLUSION

We appreciate the opportunity to submit our Reply to the Department's Comments. We provided additional information in response to the questions raised by the Department. We will submit our annual supplement on or before November 1, 2019.

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service list.

Please contact me at (612) 330-7681 or lisa.r.peterson@xcelenergy.com or Jennifer Roesler at (612) 330-1925 or jennifer.roesler@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

LISA PETERSON
MANAGER, REGULATORY ANALYSIS

c: Service List

CERTIFICATE OF SERVICE

I, Jim Erickson, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx 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-19-498

Dated this 14th day of October 2019

/s/

Jim Erickson
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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