



Northern Natural Gas
P.O. Box 3330
Omaha, NE 68103-0330
402 398-7200

July 30, 2024

Via eFiling

Ms. Debbie-Anne Reese, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: Letter Order Pursuant to § 375.307 and Response to Land Stewardship Project
Scoping Comments
Northern Natural Gas Company
Docket No. CP24-60-000

Dear Ms. Reese:

Northern Natural Gas (Northern) hereby submits for filing with the Federal Energy Regulatory Commission (FERC) in the above-referenced docket Northern's responses to the data request issued by FERC staff July 25, 2024. FERC's requests and Northern's responses are attached.

Northern also is filing its response to the Scoping Comments filed by Land Stewardship Project on April 25, 2024, in Docket No. CP24-60-000¹. The capacity created by the Northern Lights 2025 Expansion Project is not needed to produce or ship factory farm gas and is not in any way related to factory farm gas. The primary receipt point of the service being provided by the expansion projects is at an interconnect with another interstate natural gas pipeline and not a producer of factory farm gas. Attached are responses from each of the project participants confirming that the incremental capacity that this project provides will be used to meet the residential and commercial growth needs of the project participants and is not associated with factory farm gas.

Any questions regarding the filing should be directed to the undersigned at (402) 398-7138.

Respectfully submitted,

/signed/ Donna Martens

Donna Martens
Senior Regulatory Analyst

cc: Parties of Record

¹ Scoping Comments of Land Stewardship Project, Docket No. CP24-60-000, Document Accession # 20240425-5177 (filed April 25, 2024) ("Scoping Comments").

Northern Natural Gas Company
Data Response Form For Docket No. CP24-60-000
Northern Lights 2025 Expansion

Requesting Party: FERC
Reference No: FERC-DR6-01
Requester's Name: Marsha K. Palazzi, Director, Division
of Pipeline Regulation
Subject: Cost-based Recourse Rates

Instructions for any spreadsheets to be provided in response to this data request: All workpapers must be submitted, with formulas, in spreadsheet format acceptable under the Commission's eFiling rules, such as Microsoft Excel. All spreadsheets must contain all the formulas necessary to calculate the requested rates. If the spreadsheets use macros, functions, or other techniques to perform iterative functions, Northern should provide an explanation of the macros or functions used, where they are located, and how to initiate those functions. All macros and functions should not be set at a default state to run upon opening the spreadsheet. All formulas, variables and results should be visible and not hidden. The spreadsheets should not use security features that prevent copying, modification, or printing – although Northern may provide separate spreadsheets that do have these features activated. The spreadsheets should not contain any links to sources outside the spreadsheet document. Northern should provide a version for presentation purposes, such as in PDF.

In its May 1 data response, Northern included discount adjustments when calculating the incremental cost-based rate for the Northern Lights 2025 Expansion. Please recalculate the cost-based recourse rates without discount adjustments for the Northern Lights 2025 Expansion.

Data Request 1:

In its May 1 data response, Northern included discount adjustments when calculating the incremental cost-based rate for the Northern Lights 2025 Expansion. Please recalculate the cost-based recourse rates without discount adjustments for the Northern Lights 2025 Expansion.

Response:

Please see attached; as requested a PDF and Microsoft Excel version are attached. The Excel file is separately attached at the end of the data response.

Posted: 07/30/2024

Responsibility: Luis Valdivia

Northern Natural Gas Company
Docket No. CP24-60-000
Northern Lights 2025 Expansion Project
Response to FERC Staff Data Request No.1 dated July 25, 2024

1. In its May 1 data response, Northern included discount adjustments when calculating the incremental cost-based rate for the Northern Lights 2025 Expansion. Please recalculate the cost-based recourse rates without discount adjustments for the Northern Lights 2025 Expansion.

Line No.	Particulars (a)	Reference (b)	Annual Monthly Units (c) Year 1 and 2	Tier Relationship Factors (d)	Year 1 (e)
1	Estimated Fixed Costs	Exhibit N, Page 1, Line 2			\$ 8,309,625
2	Discount Credit	Response to Staff Data Request No. 5			\$ -
3	First Year Net Estimated Fixed Costs	Lines 1 + 2			<u>\$ 8,309,625</u>
4	TFX Summer 1/	Response to Staff Data Request 5	270,627	0.7500	202,970
5	TFX Winter 1/	Response to Staff Data Request 5	<u>230,320</u>	<u>2.0000</u>	<u>460,640</u>
6	Annual Monthly TFX Reservation Billing Units (Dth)	Lines 4 + 5	500,947		<u>663,610</u>
7	Base Incremental Unit Rate	Line 3/Line 6			<u>\$ 12.522</u>
8	TFX Incremental Summer Reservation Rate	Line 7*column(d),Line 4			\$ 9.391
9	TFX Incremental Winter Reservation Rate	Line 7*column(d),Line 5			<u>\$ 25.044</u>
10	TFX Average Monthly Maximum Reservaton Rate per Dth				<u>\$ 16.588</u>

1/ With the removal of the discount credit, the number of annual monthly units available for rate design is adjusted to include all winter and summer units reflected in line 16 of Northern's response to FERC Staff data request No. 5 dated April 17, 2024.

Northern Natural Gas Company
Data Response Form For Docket No. CP24-60-000
Northern Lights 2025 Expansion

Requesting Party: FERC
Reference No: FERC-DR6-02
Requester's Name: Marsha K. Palazzi, Director, Division
of Pipeline Regulation
Subject: Tier Relationship Factors

Data Request 2:

Please explain the Tier Relationship Factors used in question 2, column d, lines 4 and 5 of Northern's May 1 data response.

Response: Consistent with Commission regulations, Northern uses Tier Relationship Factors to design its peak (winter) and off-peak (summer) Market Area reservation rates. The difference in developing peak/off-peak rates and a uniform daily rate is that instead of dividing the annual revenue requirement by 365 to obtain a daily rate, different daily rates are developed for peak and off-peak periods. Northern's currently effective Tier Relationship Factors are found in Sheet No. 206 of the General Terms and Conditions of Northern's Tariff.

Posted: 07/30/2024

Responsibility: Luis Valdivia

VERIFICATION

STATE OF NEBRASKA)

COUNTY OF DOUGLAS)

Luis Valdvia, being duly sworn, on oath, states that he is Manager, Rates and Tariffs, for Northern Natural Gas and is duly authorized to make this affidavit; that he has read the foregoing Data Response of such Company and is familiar with the contents thereof; that all the facts therein are true and correct to the best of his knowledge, information and belief.

Signed:



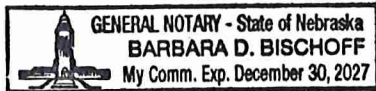
Luis Valdvia
Manager, Rates and Tariffs

SUBSCRIBED AND SWORN TO, before me, this *30* day of July 2024.

Barbara D. Bischoff

Notary Public in and for
Douglas County, Nebraska

My commission expires:



CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated this 30th day of July 2024.



Donna Martens
Senior Regulatory Analyst
P.O. Box 3330
Omaha, Nebraska 68103-0330
Telephone: (402) 398-7103

Customer Comments

Factory Farm Gas

**Northern Lights 2025 Expansion Project
Scoping Comments of Land Stewardship Project
Response of CenterPoint Energy**

CenterPoint Energy, Inc., headquartered in Houston, Texas, is a domestic energy delivery company that includes electric transmission & distribution, natural gas distribution and energy services operations. CenterPoint Energy holds a utility footprint in the proposed Northern Lights 2025 project area. CenterPoint participated in Northern Lights 2025 to serve multiple classes of customers including residential, commercial, schools and manufacturing. The capacity will be used to ensure that CenterPoint has the capacity entitlement to provide its customers with safe and reliable service. The Northern Lights 2025 capacity will not be used to ship factory farm gas. The Northern Lights 2025 capacity will be used to meet residential, commercial and manufacturing growth needs and has nothing to do with RNG supply.

1. Does CenterPoint, or any other shipper identified in Northern Natural Gas's application, require the additional capacity this Project would provide to ship factory-farm gas? CenterPoint does not need additional capacity to ship factory-farm gas.
2. To what extent do CenterPoint's, or any other entity's, plans to produce, acquire, ship, and/or sell factory-farm gas depend upon the approval of the Project?
Project approval in no way impacts CenterPoint's plans to acquire or ship factory-farm gas.
3. What and where are the sources of any factory-farm gas that would be shipped using the additional capacity provided by the Project? Not applicable.
4. Do the factory farms that would produce any factory-farm gas to be shipped using the additional capacity provided by the Project already have anaerobic digesters?
Not applicable.
 - If so, do those factory farms intend to produce or upgrade additional factory-farm gas to be shipped using the additional capacity provided by the Project.
 - If not, what kinds of digesters do those factory farms intend to install?

How will those digesters be financed? Do those factory farms intend to participate in any subsidy programs, such as California's Low-Carbon Fuel Standard?

5. What manure-management methods do the factory farms that would produce the factory-farm gas to be shipped using the additional capacity provided by the Project use now, and what methods do they intend to use if the Project is constructed? Not applicable.
6. Regarding the factory farms that would produce the factory-farm gas to be shipped using the additional capacity provided by the Project, what herd sizes do they project over the next ten years, both with and without the Project? How much revenue per animal do those factory farms project over the next ten years, both with and without the Project? Not applicable.
7. What measures would be in place to detect and mitigate methane leakage from any digesters that would produce factory-farm gas to be shipped using the additional capacity provided by the Project? Not applicable.
8. What feedstock or feedstocks will such digesters use to produce any factory-farm gas to be shipped using the additional capacity provided by the Project? Not applicable.
9. How will the digestate associated with the production of factory-farm gas to be shipped using the additional capacity provided by the Project be disposed of? Will it undergo solid-liquid separation? Will it be composted? Will it be used as fertilizer? If it will be used as fertilizer, where and under what conditions? Not applicable.
10. What systems are in place to detect and mitigate ammonia and nitrous oxide emissions from the digestate created by the production of factory-farm gas that would be shipped using the additional capacity provided by the Project? Not applicable.
11. What systems are in place to detect and mitigate unsafe levels of heavy metals in the digestate created by the production of factory-farm gas that would be shipped using the additional capacity provided by the Project? If that digestate is to be used as fertilizer, what systems are in place to detect and mitigate unsafe levels of heavy metals in the soil and in plants grown in that soil? Not applicable.
12. What measures will be in place to ensure that digestate created as a byproduct of the production of factory-farm gas that would be shipped using the additional capacity supplied by the Project and applied to agricultural fields will not contaminate nearby watersheds? Not applicable.

Dated: 7/25/24

A handwritten signature in black ink, appearing to read "Kristal Dippucio", written over a horizontal line. The signature is stylized and includes a large circular flourish at the end.

Kristal Dippucio
Manager Gas Supply
CenterPoint Energy
713-207-5965
Kristal.d.dippuccio@centerpointenergy.com

**Northern Lights 2025 Expansion Project
Scoping Comments of Land Stewardship Project
Shipper Response**

Northern States Power Company, a Minnesota corporation and Northern States Power Company, a Wisconsin corporation (NSP Companies) will utilize the Northern Lights 2025 project capacity to meet the projected Design Day requirements of our firm retail natural gas customers, which includes residential and commercial loads. The incremental capacity is necessary to efficiently and reliably meet the demands of our customers.

1. Does CenterPoint, or any other shipper identified in Northern Natural Gas's application, require the additional capacity this Project would provide to ship factory-farm gas?

The NSP Companies do not need additional capacity from the project to ship farm gas.

2. To what extent do CenterPoint's, or any other entity's, plans to produce, acquire, ship, and/or sell factory-farm gas depend upon the approval of the Project?

Project approval has no impact on the NSP Companies plans to related to farm gas.

3. What and where are the sources of any factory-farm gas that would be shipped using the additional capacity provided by the Project? **Not applicable.**

4. Do the factory farms that would produce any factory-farm gas to be shipped using the additional capacity provided by the Project already have anaerobic digesters? **Not applicable.**

- If so, do those factory farms intend to produce or upgrade additional factory-farm gas to be shipped using the additional capacity provided by the Project.
- If not, what kinds of digesters do those factory farms intend to install? How will those digesters be financed? Do those factory farms intend to participate in any subsidy programs, such as California's Low-Carbon Fuel Standard?

5. What manure-management methods do the factory farms that would produce the factory-farm gas to be shipped using the additional capacity provided by the Project use now, and what methods do they intend to use if the Project is constructed? **Not applicable.**

6. Regarding the factory farms that would produce the factory-farm gas to be shipped using the additional capacity provided by the Project, what herd sizes do they project over the next ten years, both with and without the Project? How much revenue per animal do those factory farms project over the next ten years, both with and without the Project? [Not applicable.](#)
7. What measures would be in place to detect and mitigate methane leakage from any digesters that would produce factory-farm gas to be shipped using the additional capacity provided by the Project? [Not applicable.](#)
8. What feedstock or feedstocks will such digesters use to produce any factory-farm gas to be shipped using the additional capacity provided by the Project? [Not applicable.](#)
9. How will the digestate associated with the production of factory-farm gas to be shipped using the additional capacity provided by the Project be disposed of? Will it undergo solid-liquid separation? Will it be composted? Will it be used as fertilizer? If it will be used as fertilizer, where and under what conditions? [Not applicable.](#)
10. What systems are in place to detect and mitigate ammonia and nitrous oxide emissions from the digestate created by the production of factory-farm gas that would be shipped using the additional capacity provided by the Project? [Not applicable.](#)
11. What systems are in place to detect and mitigate unsafe levels of heavy metals in the digestate created by the production of factory-farm gas that would be shipped using the additional capacity provided by the Project? If that digestate is to be used as fertilizer, what systems are in place to detect and mitigate unsafe levels of heavy metals in the soil and in plants grown in that soil? [Not applicable.](#)
12. What measures will be in place to ensure that digestate created as a byproduct of the production of factory-farm gas that would be shipped using the additional capacity supplied by the Project and applied to agricultural fields will not contaminate nearby watersheds? [Not applicable.](#)

Dated: June 13, 2024

A handwritten signature in black ink, appearing to read 'J. Holstein', is written over a light gray rectangular background.

Shipper Contact Name: Justin Holstein
Title: Manager, Gas Resource Planning
Phone: 303-571-2750
Email: justin.holstein@xcelenergy.com

**Northern Lights 2025 Expansion Project
Scoping Comments of Land Stewardship Project
Shipper Response**

Wisconsin Gas LLC (Wisconsin Gas) is a wholly owned subsidiary of WEC Energy Group, Inc. and provides natural gas distribution service in the state of Wisconsin. We Energies is the trade name of Wisconsin Gas along with Wisconsin Electric Power Co. Their headquarters are located in Milwaukee, Wisconsin.

Wisconsin Gas is a participant in the Northern Lights 2025 Expansion Project to serve residential, commercial and industrial customers within multiple Town Border Stations. Major industries served include real estate, restaurants, governmental, food products, and metals manufacturing.

Wisconsin Gas received approval from the Public Service Commission of Wisconsin to contract for the capacity requested in the Northern Lights 2025 Expansion Project.

1. Does CenterPoint, or any other shipper identified in Northern Natural Gas's application, require the additional capacity this Project would provide to ship factory-farm gas? Shipper does not need additional capacity to ship factory-farm gas.
2. To what extent do CenterPoint's, or any other entity's, plans to produce, acquire, ship, and/or sell factory-farm gas depend upon the approval of the Project? Project approval in no way impacts shippers plans to acquire or ship factory-farm gas.
3. What and where are the sources of any factory-farm gas that would be shipped using the additional capacity provided by the Project? Not applicable.
4. Do the factory farms that would produce any factory-farm gas to be shipped using the additional capacity provided by the Project already have anaerobic digesters? Not applicable.
 - If so, do those factory farms intend to produce or upgrade additional factory-farm gas to be shipped using the additional capacity provided

by the Project.

- If not, what kinds of digesters do those factory farms intend to install? How will those digesters be financed? Do those factory farms intend to participate in any subsidy programs, such as California's Low-Carbon Fuel Standard?
5. What manure-management methods do the factory farms that would produce the factory-farm gas to be shipped using the additional capacity provided by the Project use now, and what methods do they intend to use if the Project is constructed? **Not applicable.**
 6. Regarding the factory farms that would produce the factory-farm gas to be shipped using the additional capacity provided by the Project, what herd sizes do they project over the next ten years, both with and without the Project? How much revenue per animal do those factory farms project over the next ten years, both with and without the Project? **Not applicable.**
 7. What measures would be in place to detect and mitigate methane leakage from any digesters that would produce factory-farm gas to be shipped using the additional capacity provided by the Project? **Not applicable.**
 8. What feedstock or feedstocks will such digesters use to produce any factory-farm gas to be shipped using the additional capacity provided by the Project? **Not applicable.**
 9. How will the digestate associated with the production of factory-farm gas to be shipped using the additional capacity provided by the Project be disposed of? Will it undergo solid-liquid separation? Will it be composted? Will it be used as fertilizer? If it will be used as fertilizer, where and under what conditions? **Not applicable.**
 10. What systems are in place to detect and mitigate ammonia and nitrous oxide emissions from the digestate created by the production of factory-farm gas that would be shipped using the additional capacity provided by the Project? **Not applicable.**
 11. What systems are in place to detect and mitigate unsafe levels of heavy metals in the digestate created by the production of factory-farm gas that would be shipped using the additional capacity provided by the Project? If that digestate is to be used as fertilizer, what systems are in place to detect and mitigate unsafe levels of heavy metals in the soil and in plants grown in that soil? **Not applicable.**
 12. What measures will be in place to ensure that digestate created as a byproduct of the production of factory-farm gas that would be shipped using the additional capacity supplied by the Project and applied to agricultural fields will not contaminate nearby watersheds? **Not applicable.**

Dated: 6/20/2024

Emily VandenAvond

Shipper Contact Name: Emily VandenAvond

Title: Manager Planning and Contracts

Phone: 414-221-2386

Email:

Emily.VandenAvond@wecenergygroup.com


**Northern Lights 2025 Expansion Project
Scoping Comments of Land Stewardship Project
Shipper Response**

Midwest Natural Gas is a natural gas public utility regulated by the Public Service Commission of Wisconsin. Midwest Natural Gas was started in July 1964 and today distributes natural gas to over 19,000 customers throughout several communities in western Wisconsin. Midwest Natural Gas is committed to providing safe, clean, and reliable energy in the form of natural gas to its many customers at an affordable price. Midwest Natural Gas is made up of 22 employees operating 626 miles of main in 8 counties of western Wisconsin.

1. Does CenterPoint, or any other shipper identified in Northern Natural Gas's application, require the additional capacity this Project would provide to ship factory-farm gas? **Shipper does not need additional capacity to ship factory-farm gas.**
2. To what extent do CenterPoint's, or any other entity's, plans to produce, acquire, ship, and/or sell factory-farm gas depend upon the approval of the Project? **Not applicable. Shipper does not have plans to produce, acquire, ship and/or sell factory-farm gas.**
3. What and where are the sources of any factory-farm gas that would be shipped using the additional capacity provided by the Project? **Not applicable.**
4. Do the factory farms that would produce any factory-farm gas to be shipped using the additional capacity provided by the Project already have anaerobic digesters? **Not applicable.**
 - If so, do those factory farms intend to produce or upgrade additional factory-farm gas to be shipped using the additional capacity provided by the Project.
 - If not, what kinds of digesters do those factory farms intend to install? How will those digesters be financed? Do those factory farms intend to participate in any subsidy programs, such as California's Low-Carbon Fuel Standard?
5. What manure-management methods do the factory farms that would produce the factory-farm gas to be shipped using the additional capacity provided by the Project use now, and what methods do they intend to use if the Project is constructed? **Not applicable.**

6. Regarding the factory farms that would produce the factory-farm gas to be shipped using the additional capacity provided by the Project, what herd sizes do they project over the next ten years, both with and without the Project? How much revenue per animal do those factory farms project over the next ten years, both with and without the Project? [Not applicable.](#)
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12. What measures will be in place to ensure that digestate created as a byproduct of the production of factory-farm gas that would be shipped using the additional capacity supplied by the Project and applied to agricultural fields will not contaminate nearby watersheds? [Not applicable.](#)

Dated: 7/11/24



Shipper: Midwest Natural Gas Company
Contact Name: Aaron Welsh
Title: General Manager
Phone: 608-781-1011 Ext 228
Email: aaronw@midwestnaturalgas.com