

October 3, 2013

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G011/M-13-670

Dear Dr. Haar:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

A request by Minnesota Energy Resources Corporation (MERC or the Company) for approval by the Minnesota Public Utilities Commission (Commission) of a change in demand entitlement for its customers served off of the Northern Natural Gas Company (NNG) system effective in the Purchased Gas Adjustment (PGA) on November 1, 2013.

The filing was submitted on August 1, 2013. The petitioner is:

Gregory J. Walters
Minnesota Energy Resources Corporation
3460 Technology Drive NW
Rochester, MN 55901

Based on its investigation, the Department recommends that the Commission:

- **allow** MERC to recover storage gas costs through the commodity portion of the PGA, rather than the demand portion;
- **accept** MERC-NNG's peak-day analysis with the caveat that the Department cannot fully verify the results of MERC's analysis as mentioned herein;
- **accept** MERC-NNG's proposed level of demand entitlement; and
- **allow** the proposed recovery of associated demand costs effective November 1, 2013.

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The Department requests that MERC confirm in Reply Comments, the change in TFX5 Max and Discount demand levels. The Department requests that MERC explain in Reply Comments the differences in FDD storage contract reservation and capacity amounts shown in DOC Attachment 1.

The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ MICHELLE ST. PIERRE
Financial Analyst

/s/ SACHIN SHAH
Rates Analyst

MS/SS/ja
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
 MINNESOTA DEPARTMENT OF COMMERCE
 DIVISION OF ENERGY RESOURCES

DOCKET NO. G011/M-13-670

I. SUMMARY OF COMPANY'S PROPOSAL

Pursuant to Minnesota Rules 7825.2910, subpart 2, Minnesota Energy Resources Corporation-(MERC or the Company) filed a change in demand entitlement petition (Petition) on August 1, 2013 for its customers served off of the Northern Natural Gas Co. (NNG) system.¹ In its Petition, MERC requested that the Minnesota Public Utilities Commission (Commission) accept the following changes in the Company's overall level of contracted capacity.²

Table 1

The Company's Proposed Total Entitlement Changes	
Type of Entitlement	Proposed Changes: increase (decrease) (Dkt) ³
TF 12 Base and Variable	763
TF5	(763)
TFX5 (Max Rate)	199
TFX5 (Discount Rate)	(199)
NNG Zone Gas Daily Delivery (GDD) Call Option	20,000
Total Entitlement Net Change	20,000

¹ In its July 1, 2013 rearrangement/consolidation of its four Purchased Gas Adjustment (PGA) systems, MERC named the PGA for the NNG customers "MERC-NNG." MERC's other PGA systems were combined and named "MERC-Consolidated." On August 1, 2013, MERC filed a demand entitlement request for MERC-Consolidated in Docket No. G011/M-13-669.

² MERC noted in its August 1, 2013 cover letter that any updated information will be provided with its November 1, 2013 filing.

³ Dekatherms (Dkt).

MERC proposed to increase the 12-month capacity by 763 Dkt, reduce the five-month capacity by the same amount and purchase a NNG Zone GDD Call Option of 20,000.⁴ MERC indicated that the demand entitlement increased primarily due to purchasing a NNG Zone Delivery Call Option (20,000 Dkt) which was not part of the petition in 2012/13.⁵

Further, the Minnesota Department of Commerce, Division of Energy Resources (Department or DOC) compared MERC-NNG's Attachment 4, page 2 to MERC-NNG's August 2013 PGA⁶ and found that MERC increased TFX5 (5-month) at the maximum rate from 57,172 to 57,371 Dkt or by 199 Dkt and reduced TFX5 at the discount rate from 1,999 to 1,800 Dkt or by 199 Dkt. The Department recommends that MERC confirm in Reply Comments, the change in TFX5 Max and Discount demand levels since there was no discussion in the Petition.

The net change to the design-day capacity is an increase of 20,000 Dkt. As discussed further below, MERC's projected 2013-2014 design-day requirements (overall needs of its firm customers on a design day) increased by 19,995 Dkt (or approximately 8.85 percent) from the previous year.

MERC stated that it "proposes no change in TFX Apr. and TFX Oct. and no change in Firm Deferred Delivery (FDD storage) in other pipeline entitlements that are not included in peak day deliverability."⁷ However, it appears that MERC made changes to its FDD storage contracts.⁸ See DOC Attachment 1, page 2, last column. The Department requests that MERC explain in Reply Comments the differences in FDD storage contract reservation and capacity amounts shown in DOC Attachment 1, page 2.

The Department does not oppose any of MERC's proposed changes. In discussions with Company personnel on October 1, 2013, the Department understands that updated information will be provided by MERC on or about November 1, 2013. Thus, the Department will discuss the effect of the proposed demand changes on rates in subsequent Response Comments.

⁴ The NNG Zone GDD Call Option is discussed further in MERC's March 22, 2012 Reply Comments in Docket No. G011/M-11-1084. The call option is a delivered service, meaning MERC's supplier uses their own firm NNG transportation to deliver supply to MERC's Zone EF delivery point when called on. Thus, the Department does not consider the NNG Zone GDD call option a financial hedge.

⁵ Petition page 2. The Department notes that there are no page numbers on the Petition.

⁶ Docket No. G011/AA-13-662.

⁷ Petition, page 15.

⁸ For years prior to 2013-14, the Department notes that MERC's Attachment 10 shows only MERC-PNG's NNG entitlement levels rather than MERC's combined NNG levels. Moreover, the Company provided no schedule that added together the previous NNG entitlement levels for MERC-PNG and MERC-NMU to arrive at the Company's proposed MERC-NNG system levels. The Department prepared Attachment 1 to show the detail for prior years for MERC-PNG's and MERC-NMU's NNG system entitlement levels as well as totals for the combined NNG system levels.

II. THE DEPARTMENT'S ANALYSIS OF THE COMPANY'S PROPOSAL

The Department analyzed the following components of the Company's request:

- storage costs allocated to commodity costs;
- changes to capacity;
- design-day requirement; and
- reserve margin.

A. STORAGE COSTS

The Department has advocated in several recent demand entitlement filings⁹ that demand costs associated with storage contracts be recovered through the commodity portion of the PGA since all customers, not just firm customers, benefit from stored gas. The Commission has not yet determined whether storage-related costs are more appropriately recovered through the commodity or through the demand portion of MERC's PGAs.

The Department notes that the Commission allowed CenterPoint Energy to allocate a portion of its storage costs to commodity costs in CenterPoint Energy's PGA.¹⁰ Similarly, the Department recommends that the Commission allow MERC to recover storage gas costs through the commodity portion of the PGA, rather than the demand portion.

While the Department has been recommending this rate design change since MERC's 2007 demand entitlement dockets, the Department is aware that it would be problematic to implement such changes retroactively; as a result, the Department recommends that the Commission address this question of rate design and implement the change on a going-forward basis.

B. MERC'S PROPOSED CHANGES

1. Capacity

As indicated in DOC Attachments 1 and 2, the Company proposed to increase its total entitlement level in Dkt as follows:

⁹ See the Commission's February 6, 2008 Order in Docket No. E,G999/AA-06-1208, for more background.

¹⁰ See the Commission's February 28, 2012 Order in Docket No. G008/M-07-561.

Table 2

Previous Entitlement (Dkt)	Proposed Entitlement (Dkt)	Entitlement Changes (Dkt)	Change From Previous Year (%)¹¹
233,485	253,485	20,000	8.57%

As indicated in the current filing, MERC purchased a NNG Zone Delivery Call Option of 20,000 Dkt. As discussed below, the design day increased by 19,995 Dkt. As also discussed below, MERC-NNG's reserve margin is reasonable. Therefore, the Department concludes that MERC-NNG's proposed level of demand entitlement is reasonable and recommends acceptance of the proposed level of capacity.

2. *Design-Day Requirement*

As indicated in DOC Attachment 2, the Company proposed to increase its total design day in Dkt as follows:

Table 3

Previous Design Day (Dkt)	Proposed Design Day (Dkt)	Design Day Changes (Dkt)	Change From Previous Year (%)
225,883	245,878	19,995	8.85%

MERC provided significant discussion regarding its design-day calculation. The Department notes that the Company's design-day analysis is similar to the process that it has used in prior demand entitlement filings. MERC once again explored the use of additional weather variables in its review of other design-day regression models but did not use the variables in the Company's final design-day analysis. The Department does not oppose MERC's evaluation of other weather determinants in its efforts to produce the most robust design-day estimates possible; however, the Department notes that some of these additional data were taken from a proprietary source as was discussed in the Department's January 3rd, 10th, and March 12th, 2012 *Comments* in Docket Nos. G011/M-11-1082, G011/M-11-1083, and G011/M-11-1084 respectively. When a utility uses proprietary data in its analysis, the Department cannot fully verify that the results of the analysis are correct.

In addition, the issue of autocorrelation was discussed in the Department's March 4th, 2013 *Comments* in Docket Nos. G011/M-12-1192, G011/M-12-1193, G011/M-12-1194 and G011/M-12-1195 wherein the Department requested that, in future demand entitlement filings, MERC

¹¹ The Department combined MERC's historical NNG data in DOC Attachment 2 beginning with the fiscal year 2006-07.

check the regression models it ultimately uses for autocorrelation and correct the model if autocorrelation is present. The Department notes that MERC corrected its models for autocorrelation in the present docket.

The Department recommends that the Commission accept MERC-NNG's peak-day analysis with the caveat that the Department cannot fully verify the results of MERC's analysis as mentioned above.

3. Reserve Margin

As indicated in DOC Attachment 2, the proposed reserve margin is 3.09 percent or 7,607 Dkt as follows:

Table 4

Total Entitlement (Dkt)	Design-day Estimate (Dkt)	Difference (Dkt)	Reserve Margin %	% Change From Previous Year
253,485	245,878	7,607	3.09%	-0.28%

The proposed reserve margin of 3.09 percent represents a decrease of 0.28 percent over last year's reserve margin of 3.37 percent.¹² Generally, a reserve margin up to five percent is not unreasonable. Based on this information and the Department's analysis of the Company's design-day analysis, the Department concludes that the reserve margin appears to be reasonable at this time.

The proposed changes in the Petition would increase demand costs by an insignificant amount. Therefore, the Department recommends that the Commission allow the proposed recovery of demand costs effective November 1, 2013.

III. THE DEPARTMENT'S RECOMMENDATIONS

Based on its investigation, the Department recommends that the Commission:

- allow MERC to recover storage gas costs through the commodity portion of the PGA, rather than the demand portion;
- accept MERC-NNG's peak-day analysis with the caveat that the Department cannot fully verify the results of MERC's analysis as mentioned above;
- accept MERC-NNG's proposed level of demand entitlement; and
- allow the proposed recovery of associated demand costs effective November 1, 2013.

¹² MERC's Attachment 3.

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Analysts assigned: Michelle St. Pierre/Sachin Shah

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The Department requests that MERC confirm in Reply Comments, the change in TFX5 Max and Discount demand levels. The Department requests that MERC explain in Reply Comments the differences in FDD storage contract reservation and capacity amounts shown in DOC Attachment 1.

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DOC Attachment 1
 MERC-NING

	10-1168		10-1166		11-1088		12-558		12-559		12-1193		12-1195		13-670		
	GS	NMU	GS	NMU	GS	NMU	GS	NMU	GS	NMU	GS	NMU	GS	NMU	Total	Change	
NNG Design Day	194,588	23,615	211,182	23,778	234,960	234,960	211,182	23,778	234,960	211,182	23,778	234,960	200,785	25,003	225,788	245,878	20,090
Customer Requirements moving to Transportation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Adjusted NNG Design Day	194,588	23,615	211,182	23,778	234,960	234,960	211,182	23,778	234,960	211,182	23,778	234,960	200,785	25,003	225,788	245,878	20,090
Adjusted NNG Design Day Percentages	89.18%	10.82%	89.88%	10.12%	100.00%	100.00%	89.88%	10.12%	100.00%	89.88%	10.12%	100.00%	88.93%	11.07%	100.00%	100.00%	20,090
Total NNG Design Day Capacity	233,627	23,615	221,436	23,778	245,214	245,214	221,436	23,778	245,214	221,436	23,778	245,214	208,007	25,003	233,010	253,485	20,475
Total NMU Design Day Capacity		23,615		23,778		23,778		57,969		57,969				25,003			
Less: NGPL adjusted for nonrecalable releases	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N/A	N/A
Less: Wind	2,500	0	2,500	0	2,500	2,500	2,500	0	2,500	2,500	0	2,500	2,500	0	2,500	N/A	N/A
Less: LS Power	25,951	3,149	29,100	0	29,100	29,100	29,100	0	29,100	29,100	0	29,100	910	0	910	N/A	N/A
Less: Northwestern Energy (Ortonville)	0	0	910	0	910	910	910	0	910	910	0	910	910	0	910	N/A	N/A
Less: Chicago delivery to Viking	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N/A	N/A
Less: TFX(5)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N/A	N/A
Less: TFX(5)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N/A	N/A
Less: TFX(5)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N/A	N/A
Less: Contract Demand Units	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N/A	N/A
Total Design Day Capacity (excluding direct assignment)	205,176	50,379	255,555	47,556	267,402	301,613	219,846	81,767	301,613	219,846	81,767	301,613	206,417	50,006	256,423	N/A	N/A
Factors for All Winter Capacity	80.29%	19.71%	82.22%	17.78%	100.00%	100.00%	72.89%	27.11%	100.00%	72.89%	27.11%	100.00%	60.50%	19.50%	100.00%	N/A	N/A
Entitlements in PGA																	
TFX12B	34,875	4,232	42,396	4,774	47,170	47,170	42,396	4,774	47,170	42,396	4,774	47,170	41,156	6,014	47,170	47,044	(126)
TFX12V	32,290	3,919	36,209	2,848	28,146	28,146	25,298	2,848	28,146	25,298	2,848	28,146	25,820	2,326	28,146	29,035	889
net change	28,785	3,493	32,278	3,267	32,278	32,278	29,011	3,267	32,278	29,011	3,267	32,278	28,704	3,574	32,278	31,515	(763)
TFX5	9,651	1,171	10,822	1,095	10,822	10,822	9,727	1,095	10,822	9,727	1,095	10,822	9,624	1,198	10,822	10,822	0
TFX(5) (112486)	51,163	6,208	57,371	5,806	57,169	57,169	51,383	5,806	57,189	51,383	5,806	57,189	50,819	6,370	57,189	57,371	182
TFX(5) (112661)	5,351	649	6,000	5,393	6,000	6,000	5,393	607	6,000	5,393	607	6,000	5,336	664	6,000	6,000	0
TFX(5) (112486)	1,605	195	1,800	182	1,982	1,982	1,800	182	1,982	1,800	182	1,982	1,800	182	1,982	1,800	(182)
TFX(5) (12-V)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
TFX12 (111866)	1,144	139	1,283	130	1,283	1,283	1,153	130	1,283	1,153	130	1,283	1,141	142	1,283	1,283	0
TFX12 (111866)	7,376	895	8,271	837	8,271	8,271	7,434	837	8,271	7,434	837	8,271	7,355	916	8,271	8,271	0
TFX5 (111866)	22,306	2,707	25,013	2,531	25,013	25,013	22,482	2,531	25,013	22,482	2,531	25,013	22,243	2,770	25,013	25,013	0
Total Entitlements in PGA	194,546	23,608	218,154	22,077	218,154	218,154	196,077	22,077	218,154	196,077	22,077	218,154	193,998	24,156	218,154	218,154	0
Entitlements in PGA (NNG)																	
Wind	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
LS Power	2,500	0	2,500	0	2,500	2,500	2,500	0	2,500	2,500	0	2,500	2,500	0	2,500	2,500	0
Northwestern Energy (Ortonville)	25,951	3,149	29,100	0	29,100	29,100	29,100	0	29,100	29,100	0	29,100	910	0	910	910	0
NNG Zone GDD Call Option	0	0	0	0	0	0	11,235	1,265	12,500	11,235	1,265	12,500	0	0	0	20,000	20,000
TFX7 chg to TFX12 (111866)*	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	10,631	1,290	11,921	1,206	11,921	11,921	10,715	1,206	11,921	10,715	1,206	11,921	10,601	1,320	11,921	11,921	0
Total Capacity before Peak Shaving	39,082	4,439	43,521	2,471	27,831	27,831	25,360	2,471	27,831	25,360	2,471	27,831	24,011	3,820	27,831	35,331	20,000
LP Peak Shaving	233,628	28,047	261,675	24,548	245,985	245,985	221,437	24,548	245,985	221,437	24,548	245,985	208,009	25,476	233,485	253,485	20,000
Total Design Day Capacity w/o Contract Demand	233,628	28,047	261,675	24,548	245,985	245,985	221,437	24,548	245,985	221,437	24,548	245,985	208,009	25,476	233,485	253,485	20,000
Total Transp. (with TFX Offpeak less LSP)	207,677	24,898	232,575	23,778	234,960	234,960	221,437	23,778	234,960	221,437	23,778	234,960	208,009	25,476	233,485	253,485	20,000
Total Annual Transportation	67,165	8,151	75,316	7,622	75,316	75,316	67,694	7,622	75,316	67,694	7,622	75,316	66,976	8,340	75,316	111,786	36,470
Total Seasonal Transportation	62,696	6,395	69,091	5,960	69,091	69,091	53,293	5,960	59,273	53,293	5,960	59,273	52,747	6,526	59,273	141,689	82,426
Total Percent Seasonal	22.6%	22.8%	24.1%	24.4%	24.4%	24.4%	24.1%	24.4%	24.4%	24.1%	24.4%	24.4%	25.4%	25.6%	25.6%	55.9%	1
LS Power as % of Total DD Capacity	11.1%	11.2%	11.2%	11.2%	11.2%	11.2%	11.1%	11.2%	11.2%	11.1%	11.2%	11.2%	11.1%	11.2%	11.2%	0.0%	0
Reserve Margin	20.06%	18.77%	20.06%	18.77%	20.06%	20.06%	18.77%	18.77%	20.06%	18.77%	18.77%	20.06%	18.77%	18.99%	20.06%	3.09%	0
Total Design Day Capacity w/ contract demand	233,628	28,047	261,675	24,548	245,985	245,985	221,437	24,548	245,985	221,437	24,548	245,985	208,009	25,476	233,485	253,485	20,000
Factors	89.18%	10.82%	89.88%	10.12%	100.00%	100.00%	89.88%	10.12%	100.00%	89.88%	10.12%	100.00%	86.93%	11.07%	100.00%	100.00%	0

* Source: MERC's Aths. 10 and 12.
 **The DOC notes that these figures are different by 17 units from the PGA.

	10-1168		10-1166		11-1084		11-1088		12-558		12-1193		12-1195		13-670	
	PNG	GS	NIMU	GS	PNG	GS	NIMU	GS	PNG	GS	PNG	GS	NIMU	GS	Total	Change
Other Storage levels not included in Peak Day Deliverability.																
TFX Oct	1,784		216	2,000	1,798	202	202	2,000	1,798	202	1,779	221	2,000	2,000	2,000	0
TFX Apr	1,784		216	2,000	1,798	202	2,000	1,798	202	1,779	221	2,000	2,000	2,000	2,000	0
FDD Storage reservation (112490)	67,273		8,184	75,437	67,803	7,634	75,437	67,803	7,634	67,803	8,354	76,157	75,437	75,437	(720)	
FDD Storage capacity MSQ 1/	3,878,642		470,684	4,349,326	3,909,172	440,149	4,349,321	3,909,172	440,149	3,867,692	481,629	4,349,321	869,864	869,864	(3,479,457)	
FDD Storage reservation (113704)	0		0	0	0	0	0	0	0	3,085	384	3,469	5,550	5,550	2,081	
FDD Storage capacity MSQ 2/	0		0	0	0	0	0	0	0	179,755	20,245	200,000	64,000	64,000	(136,000)	
FDD Storage reservation (118215)	6,187		751	6,938	6,236	702	6,938	6,236	702	4,935	1,441	6,376	13,008	13,008	6,632	
FDD Storage capacity MSQ 3/	356,700		43,301	400,002	359,510	40,491	400,001	359,510	40,491	57,838	83,072	140,910	150,000	150,000	9,090	
FDD Storage reservation (118657)	4,949		601	5,550	4,988	562	5,550	4,988	562	133,390	615	134,005	3,468	3,468	(130,537)	
FDD Storage capacity MSQ 4/	285,370		34,630	320,000	287,615	32,385	320,000	287,615	32,385	284,565	35,435	320,000	40,000	40,000	(280,000)	
FDD Storage reservation total										209,213	10,794	220,007	97,463	97,463	(122,544)	
FDD Storage capacity total										4,387,945	622,286	5,010,231	1,123,864	1,123,864	(3,886,367)	
SMS	20,226		2,454	22,680	20,385	2,295	22,680	20,385	2,295	20,168	2,512	22,680	22,680	22,680	0	
Bison/NBPL (FT0003 & T8673F)	44,589		5,411	50,000	44,940	5,060	50,000	44,940	5,060	44,463	5,537	50,000	50,000	50,000	0	
AECO Storage	0		665,043	665,043	0	666,223	666,223	666,223	666,223	0	648,265	648,265	648,265	648,265	0	
1/ Cycled Volumes =	775,728		94,137	869,865	781,834	88,030	869,864	781,834	88,030	773,538	96,326	869,864	869,864	869,864	0	
2/ Cycled Volumes =	0		0	0	0	0	0	0	0	35,571	4,429	40,000	40,000	40,000	0	
3/ Cycled Volumes =	71,342		8,668	80,000	71,904	8,096	80,000	71,904	8,096	11,568	16,610	28,178	28,178	28,178	0	
4/ Cycled Volumes =	57,074		6,926	64,000	57,523	6,477	64,000	57,523	6,477	56,913	7,087	64,000	64,000	64,000	0	

Heating Season	Number of Firm Customers				Design Day Requirement				Total Entitlement + Peak Shaving				Reserve Margin (10)
	(1) No. of Design Day Customers	(2) Change from Previous Year	(3) % Change From Previous Year	(4) Design Day (Mcf)	(5) Change from Previous Year	(6) % Change From Previous Year	(7) Total Entitlement (Mcf)*	(8) Change from Previous Year	(9) % Change From Previous Year	(10) % of Reserve Margin [(7)-(4)]/(4)			
2013-2014	178,578	1,641	0.93%	245,878	19,995	8.85%	253,485	20,000	8.57%	3.09%			
2012-2013	176,937	1,696	0.97%	225,883	(9,172)	-3.90%	233,485	-12,500	-5.08%	3.37%			
2011-2012	175,241	-786	-0.45%	235,055	16,842	7.72%	245,985	-15,690	-6.00%	4.65%			
2010-2011	176,027	799	0.46%	218,213	(9,827)	-4.31%	261,675	7,000	2.75%	19.92%			
2009-2010	175,228	1,266	0.73%	228,040	(19,148)	-7.75%	254,675	4,227	1.69%	11.68%			
2008-2009	173,962	1,846	1.07%	247,188	23,434	10.47%	250,448	0	0.00%	1.32%			
2007-2008	172,116	7,063	4.28%	223,754	1,635	0.74%	250,448	2036	0.82%	11.93%			
2006-2007	165,053			222,119			248,412			11.84%			
Average:			1.14%			1.69%			0.39%	8.47%			

Columns (1) and (4) were provided by MERC in Attachment 1, page 3.

Firm Peak Day Sendout

Heating Season	(11) Number of Peak Day Customers	(12) Firm Peak Day Sendout (Mcf)	(13) Change from Previous Year	(14) % Change From Previous Year	(15) Excess/Def. per Cust. [(7)-(4)]/(1)	(16) Design Day per Customer (4)/(1)	(17) Entitlement per Customer (7)/(1)	(18) Peak Day Sendout per PD Customer (12)/(11)**
2012-2013	176937	unknown	#VALUE!	#VALUE!	0.04	1.28	1.32	#VALUE!
2011-2012	175,241	unknown	#VALUE!	#VALUE!	0.06	1.34	1.40	#VALUE!
2010-2011	176,027	unknown	#VALUE!	#VALUE!	0.25	1.24	1.49	#VALUE!
2009-2010	175,228	unknown	#VALUE!	#VALUE!	0.15	1.30	1.45	#VALUE!
2008-2009	173,962	unknown	#VALUE!	#VALUE!	0.02	1.42	1.44	#VALUE!
2007-2008	172,116	unknown	#VALUE!	#VALUE!	0.16	1.30	1.46	#VALUE!
2006-2007	165,053	unknown	#VALUE!	#VALUE!	0.16	1.35	1.51	#VALUE!
Average:				#VALUE!	0.11	1.33	1.44	#VALUE!

* MERC-PNG NNG added to MERC-NMU NNG areas from DOC's prior Attachment 2 for each company.

** The number of design day customers are used when the number of firm peak day customers is unknown (18=19).

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Comments**

Docket No. G011/M-13-670

Dated this 3rd day of **October, 2013**

/s/Sharon Ferguson

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