

June 29, 2015

Daniel P. Wolf
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-15-420

Dear Mr. Wolf:

Attached are *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 of the Company's 2014 Natural Gas Conservation Improvement Program Tracker Account, Including a Proposed 2014 Demand Side Management Financial Incentive and a revised Conservation Cost Recovery Adjustment (*Petition*).

The *Petition* was filed on May 1, 2015 by:

Jim Phillippo
Program Manager, Energy Efficiency Programs
Minnesota Energy Resources Corporation
1995 Rahncliff Court, Suite 200
Eagan, MN, 55122

The Department recommends that the Commission **approve the Company's petition with modifications**. The Department is available to answer any questions that the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ MICHAEL N. ZAJICEK
Rates Analyst

MNZ/ja
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET No. G011/M-15-420

I. SUMMARY OF THE UTILITY'S PROPOSAL

On May 1, 2015, Minnesota Energy Resources Corporation (MERC or the Company) submitted its annual Conservation Improvement Program (CIP) report (*Petition*) for 2014 with the Minnesota Public Utilities Commission (Commission) in Docket No. G011/M-15-420. The *Petition* contains the following sections:

- proposed recoveries and expenditures in the Company's natural gas (gas) CIP tracker accounts during 2014,
- proposed change in the Company's currently approved gas Conservation Cost Recovery Adjustment (CCRA), and
- request for approval of a proposed gas DSM financial incentive of \$2,093,158 for 2014.

The Company also filed its 2014 CIP Status Report (*Status Report*). The *Status Report* is intended to fulfill the requirements of the Minnesota Department of Commerce, Division of Energy Resources' (Department) annual CIP reporting rules contained in Minnesota Rules part 7690.0500. Since the Company's *Status Report* does not require Commission approval, this portion of the *Petition* has been assigned to a separate docket.¹

MERC consolidated its MERC-NMU and MERC-PNG tracker accounts and rolled over the remaining balances into a single consolidated account effective January 1, 2015. In MERC-PNG's and MERC-NMU's 2012 DSM financial incentive, CIP tracker account, and CCRA filings, the Commission ordered the Company to submit schedules of all adjustments made to arrive at the 2013 tracker balance.² These adjustments include repayment of CIP expenses by customers who were incorrectly treated as CIP-exempt. Another case of a customer being incorrectly treated as CIP-exempt was discovered during MERC's 2013 rate case (Docket No. G011/GR-13-617) and has been addressed in this filing.

¹ See Docket No. G011/CIP-12-548.02

² See Docket Nos. G011/M-13-369 and G007/M-13-370.

II. THE DEPARTMENT'S ANALYSIS

The Department's analysis of MERC's *Petition* is provided below in the following sections:

- in Section II.A, MERC's proposed 2014 gas DSM financial incentive;
- in Section II.B, MERC's proposed 2014 gas CIP tracker accounts;
- in Section II.C, MERC's proposed CCRA;
- in Section II.D, a review of MERC's gas DSM and CIP activities for the period 2009 through 2014; and
- in Section II.E, a review of MERC's filed conservation cost repayment and adjustment schedule;

A. MERC'S PROPOSED GAS DSM FINANCIAL INCENTIVE FOR 2014

1. *Background and Summary of MERC's Proposed Gas 2014 DSM Financial Incentive*

The Shared Savings DSM financial incentive plan was approved by the Commission in Docket No. E,G999/CI-08-133 on January 27, 2010. On December 20, 2012 the Commission issued its *Order Adopting Modifications to Shared Savings Demand Side Management Financial Incentives* (Modification Order). The Shared Savings approach emphasizes a 1.5 percent energy savings goal, and ties the incentive earned by the utility to pursuit of the 1.5 percent savings goal. The incentive mechanism sets a specific dollar amount per unit of energy saved that each utility will earn at energy savings equal to 1.5 percent of annual non-CIP-exempt retail sales. That dollar amount is referred to as the incentive calibration. The higher the calibration, the higher the incentive will be at all energy savings levels after the threshold. Specifically, each electric utility's incentive is calibrated so that when the utility achieves energy savings equal to 1.5 percent of retail sales, electric utilities will earn an incentive equal to \$0.07 per kWh saved and gas utilities will earn \$9 per thousand cubic feet (Mcf) saved. The Commission's Modification Order stated, in part:

The Commission hereby adopts the Department's proposal for the continuation of the new shared savings financial incentive with the following:

- A. A threshold set at half of the utility's average achievements from 2007 to 2011 for utilities with triennial CIPs beginning in 2013, removing both the maximum and minimum achievements, or at 0.4 percent of retail sales, whichever is lowest. For utilities with triennial Conservation Improvement Programs beginning in 2014, the threshold shall be set at half of the utility's average achievements from 2008 to 2012, removing both the maximum and minimum

- achievements, or at 0.4 percent of retail sales, whichever is lowest.
- B. The calibration at 1.5 percent of retail sales for each utility set as follows: (1) \$9.00 per Mcf for natural gas utilities, and (2) \$0.07 per kWh for electric utilities.
 - C. A utility may not modify its incentive to correct for non-linear benefits.
 - D. The incentive shall be capped at 20 percent of net benefits for all utilities except for Minnesota Power. The Commission will defer a decision on the application of the 20 percent cap of net benefits for Minnesota Power until 2013 to allow for the consideration of updated avoided cost information for this utility.
 - E. The existing cap of 125 percent of a utility's 1.5 percent calibration level for the electric utilities (\$0.0875 per kWh) and a cap of 125 percent of the 1.0 percent target calibration for gas utilities (\$6.875) per Mcf are continued.
 - F. The percentage of net benefits to be awarded to each utility at different energy savings levels will be set at the beginning of each year.
 - G. The CIP-Exempt Class shall not be allocated costs for the new shared savings incentive. Sales to the CIP-Exempt Class shall not be included in the calculation of utility energy savings goals.
 - H. If a utility elects not to include a third-party CIP project, the utility cannot change its election until the beginning of subsequent years.
 - I. If a utility elects to include a third-party project, the project's net benefits and savings will be included in calculation of the percentage of net benefits awarded at specific energy savings levels (calculated before the CIP year begins) and in the post CIP year calculations of net benefits and energy savings achieved and incentive awarded. In any case, the energy savings will count toward the 1.5 percent savings goal.
 - J. The energy savings, costs, and benefits of modifications to non-third-party projects will be included in the calculation of a utility's DSM incentive, but will not change the percent of net benefits awarded at different energy savings levels.
 - K. The costs of any mandated, non-third-party projects (e.g., Next Generation Energy Act assessment, University of Minnesota Institute for Renewable Energy and the Environment costs) shall be excluded from the calculation of net benefits awarded at specific energy savings levels (calculated before the CIP year begins) and in the post-CIP

- year calculations of net benefits and energy savings achieved and incentive awarded.
- L. Costs, energy savings, and energy production from Electric Utility Infrastructure Projects (EUIC), solar installation and biomethane purchases shall not be included in energy savings for DSM financial incentive purposes.
 - M. The Department shall file a recommendation with the Commission on the application of a net benefits cap for Minnesota Power's incentive by October 1, 2013. The recommendation should be filed in Docket No. E,G-999/CI-08-133.
 - N. No adjustment will be made at this time to the calibration of the incentive mechanism for utilities that have Commission-approved decoupling mechanisms.
 - O. The new shared savings DSM incentive shall be in operation for the length of each utility's triennial CIP plan.

Further, the Commission approved a net benefits cap of 30 percent for Minnesota Power on November 19, 2013.

With respect to net benefits, MERC provided in its *Petition* the benefit/cost results of the revenue requirements test associated with the Company's 2014 gas CIP. According to the Company, this test results in \$15,081,932 of net benefits from CIP activities in 2014. MERC also stated that its CIP activities achieved energy savings in 2014 of 369,068 million cubic feet (MCF) of natural gas. Based on the terms and conditions of its approved DSM incentive plan, MERC requested approval of a DSM financial incentive of \$2,093,158.

2. *The Department's Review of MERC's Proposed 2014 Gas DSM Financial Incentive*

The Department's CIP Engineering Staff review of the demand and energy savings that underpin MERC's proposed 2014 DSM financial incentive is on-going.³ In all likelihood, it will not be completed before the fall of 2015. This lag between the Company's request for recovery of the incentive and completion of the Department CIP Engineering Staff review is a recurring phenomenon. In its review of MERC's 2013 DSM financial incentive filings, the Department compensated for this lag by simply assuming MERC's claimed energy savings for 2013 were correct as filed and planned to make, in the instant docket, any adjustments approved by the Deputy Commissioner of the Department. However, the Deputy Commissioner accepted MERC's 2013 Status Report without any adjustments⁴ and thus none need to be made in the instant docket.

³ Docket No. G011/CIP-12-548.02

⁴ Docket Nos. G011/CIP-09-800.03 and G007/CIP-09-803.03 on November 11, 2013.

As was done last year, the Department's analysis assumes that MERC's claimed 2014 energy savings are correct as filed. If the Deputy Commissioner of the Department subsequently approves changes to MERC's energy savings claims that impact either recovery of CIP budgets or levels of Shared Savings DSM financial incentives, those changes can be incorporated in the Company's 2015 filing that will be made May 1, 2016.

MERC's reported gas energy savings level is 369,068 MCF in the Company's 2014 *Status Report*. The Department used the 369,068 MCF energy savings in its review in this docket.

3. *The DOC's Overall Recommendation Concerning MERC's 2014 DSM Financial Incentive*

The Department recommends that the Commission approve MERC's proposed 2014 gas DSM financial incentive of \$2,093,158 to be included in the Company's gas CIP tracker account no sooner than the issue date of the Commission's *Order* in the present docket.

B. *MERC'S 2014 GAS CIP TRACKER ACCOUNT*

In its *Petition*, MERC provided a report on its 2014 recoveries and expenditures in the Company's three CIP tracker accounts: MERC-NMU, MERC-PNG, and the consolidated MERC tracker accounts. As of January 1, 2015, these accounts have been consolidated into one consolidated tracker account with final balances from the other accounts rolled into it.

1. *MERC-NMU's and MERC-PNG's 2014 Tracker Accounts*

Table 1 below provides a summary of activity in MERC-NMU's CIP tracker account during 2014.

Table 1: Summary of MERC-NMU's CIP Tracker Account Activity in 2014

<u>Description</u>	<u>Time Period</u>	<u>Amount</u>
Beginning Balance	January 1, 2014	(\$276,954.95)
CIP Expenses	January 1 through December 31, 2014	0 ⁵
Carrying Charges	January 1 through December 31, 2014	(\$35,349.83)
Recoveries	January 1 through December 31, 2014	(\$0)
Ending Balance	31-Dec-14	(\$312,304.78)

As noted in the Department's September 2, 2014 comments in Docket No. G011/M-14-369, in its December 13, 2013 Order in Docket No. M-13-370, the Commission ordered MERC-NMU to suspend the collection of MERC-NMU's CCRA once the balance reached zero. On May 12, 2014, MERC filed a compliance filing noting that the MERC-NMU tracker balance reached zero prior to the Commission's Order taking effect, but the Company

⁵ 2013 CIP expenses are allocated to the consolidated tracker account.

mistakenly continued to charge MERC-NMU customers the CCRA through April 2014. On August 12, 2014, the Company filed a letter detailing the MERC-NMU CCRA customer refund. As the refund covered the over-collected CCRA revenues from 2014, the refund did not impact the December 31, 2013 CIP Tracker Account balance.⁶ This value, plus carrying charges, was rolled into the Consolidated Tracker Account as of January 1, 2015.

MERC-PNG's 2014 CIP tracker account activity is summarized in Table 2 below.

Table 2: Summary of MERC-PNG's CIP Tracker Account Activity in 2014

<u>Description</u>	<u>Time Period</u>	<u>Amount</u>
Beginning Balance	January 1, 2013	\$12,182,461.84
CIP Expenses	January 1 through December 31, 2014	0 ⁷
Carrying Charges	January 1 through December 31, 2014	(\$49,331.05)
Past Recoveries ⁸	January 1 through December 31, 2014	(\$3,040,917.12)
Recoveries	January 1 through December 31, 2014	(\$8,588,103.61)
Carrying Charges for Northshore Adjustment		(\$555,695.00)
Ending Balance	31-Dec-14	(\$51,584.94)

In its December 13, 2013 Order in Docket No. M-13-369, the Commission ordered MERC-PNG to suspend the collection of MERC-PNG's CCRA once the balance reached zero. In August 2014, MERC determined that the MERC-PNG tracker account reached a negative balance of approximately \$1.8 million as a result of collections during 2014 and MERC's credit to the CIP tracker for the uncollected Conservation Cost Recovery Charge (CCRC) and CCRA amounts attributed to Northshore Mining from July 2006 through December 2013, before Northshore Mining's CIP exemption was effective. On September 15, 2014 MERC made a compliance filing to inform the Commission that it had stopped collecting the CCRA from MERC-PNG customers and to propose to refund non-exempt MERC-PNG customers the entire over-collection amount in the MERC-PNG tracker. On May 28, 2015 MERC submitted a filing stating that the Company had completed the refund of the PNG CCRA over-collection, which resulted in a slight adjustment to the tracker balance in April 2015. Further adjustments to the CIP tracker due to this refund are reflected in November and December of the 2014 tracker. The ending balance was rolled into the Consolidated Tracker Account as of January 1, 2015.

⁶ The January 1, 2014 beginning balance shown in Table 1 is the same as the December 31, 2013 ending balance reported and approved in Docket No. G011/M-14-369.

⁷ CIP expenses are allocated to the consolidated tracker account.

⁸ "Past Recoveries" refers to the CIP expense repayments and adjustments ordered by the Commission in Docket Nos. G011/M-10-407 and G007,011/GR-10-977. See Section E of these comments for a discussion of the CIP expense repayments and adjustments.

2. *Consolidation of MERC-PNG and MERC-NMU CIP Tracker Account Balances*

All 2014 CIP expenses were recorded in MERC’s consolidated CIP tracker account. Effective January 1, 2015 MERC consolidated the MERC-NMU and MERC-PNG tracker accounts into a single consolidated account, rolling the remaining balances into a single account balance.

Table 3 summarizes the consolidated CIP tracker account activity for 2014.

Table 3: Summary of MERC’s Consolidated Tracker Account Activity in 2014

<u>Description</u>	<u>Time Period</u>	<u>Amount</u>
Beginning Balance	January 1, 2014	\$2,598,585.17
CIP Expenses	January 1 through December 31, 2014	\$7,360,832.07
Carrying Charges	January 1 through December 31, 2014	(\$69,663.59)
2013 DSM Financial Incentive		\$2,492,730.00
CIP Recoveries	January 1 through December 31, 2014	(\$11,548,289.72)
Past Recoveries		(\$341,515.00)
Carrying Charges for Northshore Adjustment		(\$13,366.00)
Ending Balance	31-Dec-14	\$ 479,312.93

The Department reviewed MERC’s 2014 CIP tracker accounts and recommends that the Commission approve the MERC 2014 CIP tracker account activity summarized in Tables 1 through 3.

C. *MERC’S PROPOSED CONSOLIDATED CCRA*

In its *Petition*, MERC initially requested approval of a consolidated CCRA of \$0.00243 per therm, however MERC noted an error in its calculation and submitted an updated filing on May 28, 2016 requesting approval of a consolidated CCRA of \$0.00852 per therm, effective with the January 2016 billing month. MERC’s updated consolidated CCRA calculation is summarized in Table 4 below.

Table 4: MERC's Updated Calculation of its Proposed CCRA

Description	Amount
Forecasted Consolidated CIP Tracker Account Balance as of January 1, 2016	(\$125,173.68)
CIP Approved Spending Levels for 12 Months beginning January 2016	\$11,500,000.00
Requested 2014 DSM Financial Incentive ⁹	\$2,093,158
Requested 2015 DSM Financial Incentive ¹⁰	\$2,393,887
CIP Cost Recovery via Base Rates – January-December 2015	(\$12,279,555.00)
Projected Carrying Charges for 2016	(\$95,419.60)
Forecasted December 2016 Balance	\$3,486,896.72
Projected Annual Therm Sales for 2015	409,045,784
Proposed CCRA (\$/Therm)	\$0.00852

While reviewing MERC's calculation of its proposed CCRA the Department discovered an error in how the Company calculated its carrying charges. Rather than having carrying charges be based off the total monthly tracker balance and including those carrying charges in the next month's balance, the Company instead based its carrying charges on the tracker balance minus the cumulative monthly carrying charges. Essentially, MERC has been maintaining two trackers in the account, one that tracked the balance without carry charges, and another that tracked carrying charges based off the first. This resulted in MERC incorrectly calculating carrying charges because the Company did not base its carrying charges on the monthly tracker balance, but instead based them on the tracker balance minus past carrying charges. The Department recommends that MERC correct this practice going forward.

Using data supplied by MERC the Department calculated a corrected CCRA of \$0.00865 per therm, as summarized in Table 5 below. While calculating the corrected CCRA the Department also corrected the carrying charge calculation for the 2015 tracker, resulting in a January 1, 2016 balance that is \$6,554.92 higher than the Company's calculated balance.

⁹ Based on previous DSM Financial Incentives MERC expects that its requested 2014 DSM Financial Incentive, if approved, would not be credited to the tracker until 2016.

¹⁰ The Company is attempting to catch up to a more normal DSM Financial Incentive schedule after years of being behind.

Table 5: Department's Calculation of MERC's CCRA¹¹

<u>Description</u>	<u>Amount</u>
Forecasted Consolidated CIP Tracker Account Balance as of January 1, 2016	(\$118,618.76)
CIP Approved Spending Levels for 12 Months beginning January 2016	\$11,500,000.00
Requested 2014 DSM Financial Incentive ¹²	\$2,093,158
Requested 2015 DSM Financial Incentive	\$2,393,887
CIP Cost Recovery via Base Rates – January-December 2015	(\$12,279,555.00)
Projected Carrying Charges for 2016	(\$52,585.81)
Forecasted December 2016 Balance	\$3,536,285.43
Projected Annual Therm Sales for 2015	409,045,784
Proposed CCRA (\$/Therm)	\$0.00865

Table 6 below compares the Department's calculated CCRA of \$0.00865 per therm in the present docket with current MERC-PNG and MERC-NMU CCRA's.

Table 6: Comparison of MERC's Existing and Proposed CCRA's

<u>Company</u>	<u>Current CCRA</u>	<u>Proposed MERC Consolidated CCRA</u>	<u>Percent Change</u>
MERC Consolidated CCRA	\$0.00554	\$0.00865	56%

As indicated in Table 6, the revised gas CCRA represents a 56 percent increase from the current CCRA rate charge to MERC customers. The Department recommends that the Commission approve a CCRA of \$0.00865 per therm for all of MERC's customer classes, to be effective January 1, 2016 or on the first billing cycle in the next full month after Commission approval, whichever is later. The Company should submit, within 10 days of the issue date of the *Order* in the present docket, a compliance filing with the relevant tariff sheets and necessary calculations that comply with the Commission's determinations.

With respect to customer notification, the Department recommends that the Commission require MERC to include the following bill message in the billing month immediately following the date of the *Order* in the present docket. This message is included on page 11 of MERC's *Petition*.

Effective January 1, 2016, a CCRA (conservation cost recovery adjustment) has been included on your bill. The CCRA is an annual adjustment to true-up under-recovery or over-recovery of CIP (conservation improvement program) expenses. Effective January 1, 2016, the CCRA rate will be \$0.00865 per therm.

¹¹ See DOC Trade Secret Attachment 1 for the calculation of the Revised CCRA.

¹² Based on previous DSM Financial Incentives MERC expects that its requested 2014 DSM Financial Incentive achievements, if approved, would not be credited to the tracker until 2016.

In the event that the Commission does not issue an order on MERC's CCRA before January 1, 2016, MERC should revise the bill message with the correct effective date.

D. REVIEW OF MERC'S GAS DSM AND CIP ACTIVITIES (2009-2014)

In Table 7 below, the Department presents a historical comparison of MERC's gas DSM and CIP activities for the period 2009 through 2014. Data for years 2009 through 2013 include both MERC-NMU and MERC-PNG's combined results to make the comparison with the 2014 consolidated MERC's data relevant.

Table 7: History of MERC's CIP Achievements, Expenditures, and Incentives

	2009	2010	2011	2012	2013	2014 ¹³
DSM Financial Incentive	\$572,288	\$2,322,658	\$2,587,948	\$2,729,531	\$2,492,730	\$2,093,158
Incentive as a % of CIP Expenditures	18%	31%	33%	27%	29%	28%
Carrying Charges	\$ 396,940	\$ 616,967	\$ 592,929	\$ 496,537	\$ 424,887	(\$154,344) ¹⁴
Carrying Charges as a % of CIP Expenditures	13%	8%	8%	5%	5%	(2%)
Year-End Tracker Balances	\$ 8,183,421	\$12,686,756	\$10,086,519	\$11,633,350	\$14,781,047	\$115,423
CIP Expenditures (as reported in status report)	\$ 3,122,758	\$7,549,257	\$ 7,870,823	\$ 9,951,018	\$ 8,630,283	\$7,360,832
Achieved Energy Savings (Mcf)	133,570	449,441	457,747	534,596	424,827	369,068
Average Cost per Mcf Saved	\$ 23.38	\$ 16.80	\$ 17.19	\$ 18.61	\$ 20.31	\$ 19.94

As indicated in Table 7, compared to 2013, MERC's 2014:

- proposed incentive level is lower;
- energy savings are lower;
- combined year-end tracker balance is lower;
- combined carrying charges are substantially low and in the customers favor;¹⁵ and
- average cost per unit of energy saved is lower.

¹³ The DSM financial incentive, CIP expenditures, and CIP tracker account balances for 2014 listed in Table 7 are proposed by MERC in the present docket. The 2014 carrying charges and year-end tracker balances include MERC-NMU, MERC-PNG, and consolidated MERC tracker accounts; the 2014 CIP expenditures, DSM financial incentives, and achieved energy savings are credited to the consolidated MERC.

¹⁴ Parentheses indicate the Company owes ratepayers for previous over-recoveries.

¹⁵ Carrying charges are considered lower than the previous year if a utility's customers are paying less in interest on CIP funds that have not yet been collected.

E. CONSERVATION COST REPAYMENTS AND ADJUSTMENTS

In the Commission's December 13, 2013 Order in Docket No. G011/M-13-369, the Commission directed MERC to file conservation cost repayment and adjustment schedules, starting with the CIP tracker balance used in the G011/M-10-407 docket and all adjustments made to arrive at the tracker balance included in its then upcoming May 1, 2014 petition. The required adjustments came from two dockets:

- 1) In Docket No. G011/M-10-407, the Commission issued an order suspending MERC-PNG's collection of the CCRA from specific large customers. While the CCRA was suspended many of these large customers received CIP exemptions; a few customers were either denied CIP exemptions or did not apply for a CIP exemption. When the Commission ended the CCRA suspension, the Commission concluded that customers who did not receive a CIP exemption should repay their suspended CCRA amounts on non-onerous terms.
- 2) In Docket No. G007,011/GR-10-977, the Commission required MERC to credit the CIP tracker accounts for the uncollected CCRC revenues from three customers that were incorrectly treated as CIP exempt from the time MERC acquired Aquila in 2006.

In the Company's 2013 CIP Tracker filing (Docket No. G011/M-14-369), MERC filed the CIP tracker adjustment schedule in Attachment E. After reviewing Attachment E the Department concluded that the Company complied with the Commission's Order in filing the conservation cost tracker account schedules

The Department notes that another customer that was incorrectly treated as CIP exempt was discovered during MERC's 2013 rate case proceeding (Docket No. G011/GR-13-617). It was determined that CCRA amounts were not collected for Northshore Mining from July 2006 through December 2013, before Northshore Mining's CIP exemption was effective January 1, 2014. This amounted to approximately \$3.4 million, including carrying charges. This value was recovered in June of 2014. The Department concludes that the Company has correctly addressed the issue.

III. THE DEPARTMENT'S RECOMMENDATIONS

Based on the analysis provided above, the Department recommends that the Commission:

- 1) approve MERC's 2014 DSM financial incentive of \$2,093,158 to be included in the Company's CIP tracker account no sooner than the issue date of the Commission's *Order* in the present docket;
- 2) approve MERC's 2014 CIP tracker account activities as summarized in Tables 1, 2, and 3 above;

- 3) approve the revised gas CCRA of \$0.00865 per therm for all of MERCs Minnesota customer classes, to be effective January 1, 2016, or on the first billing cycle in the next full month after Commission approval, whichever is later. The approval is conditioned on the Company submitting, within 10 days of the issue date of the *Order* in the present docket, a compliance filing with the relevant tariff sheets and necessary calculations that comply with the Commission's determinations; and
- 4) require MERC to include the following bill message (with the appropriate date) following the date of the *Order* in the present docket, or January 1, 2016, whichever is later:

Effective [insert date], a CCRA (conservation cost recovery adjustment) has been included on your bill. The CCRA is an annual adjustment to true-up under-recovery or over-recovery of CIP (conservation improvement program) expenses. Effective [insert date], the CCRA rate will be \$0.00865 per therm.

Finally, the Department recommends that MERC correct its method for calculating carrying charges going forward.

/ja

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-15-420

Dated this 29th day of June 2015

/s/Sharon Ferguson

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