MINNESOTA DEPARTMENT OF COMMERCE

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September 20, 2016

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. G022/M-16-522

Dear Mr. Wolf:

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

> A Request by Greater Minnesota Gas, Inc. (Greater Minnesota or the Company) for Approval by the Minnesota Public Utilities Commission (Commission) of a Change in Contract Demand Entitlement Units Effective November 1, 2016.

The filing was submitted on June 15, 2016. The petitioner is:

> Kristine A. Anderson
> Corporate Attorney
> Greater Minnesota Gas, Inc.
> 202 South Main Street, P.O. Box 68
> Le Sueur, Minnesota 56058

The Department recommends that the Commission:

- Approve Greater Minnesota's proposed level of demand entitlements, subject to any possible changes in anticipated entitlements between the filing of these *Comments* and November 1, 2016, as shown in the Company's *Petition*; and
- Allow Greater Minnesota to recover associated demand costs, subject to any possible changes in anticipated entitlements between the filing of these *Comments* and November 1, 2016, through the monthly Purchased Gas Adjustment effective November 1, 2016.

The Department also recommends that the Commission require Greater Minnesota to provide additional information in future demand entitlement filings, as detailed in the body of these *Comments*, and that Greater Minnesota make a supplemental filing in this docket on, or about, November 1, 2016 detailing final costs.

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

Sincerely,

/s/ ADAM J. HEINEN
Rates Analyst
651-539-1825

AJH/ja
Attachment

MINNESOTA DEPARTMENT OF COMMERCE

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE MINNESOTA DEPARTMENT OF COMMERCE, DIVISION OF ENERGY RESOURCES

DOCKET NO. G022/M-16-522

I. BACKGROUND

Pursuant to Minnesota Rules 7825.2910, subpart 2, Greater Minnesota Gas, Inc. (Greater Minnesota or the Company) filed a *Petition for Approval of Changes in Contract Demand Entitlements* (*Petition*) on June 15, 2016 with the Minnesota Public Utilities Commission (Commission). The Company proposed that the changes in its demand entitlements be effective on November 1, 2016. The Commission required the Company to file its next demand entitlement filings by August 1, 2014 in Ordering Point No. 3 of its April 25, 2014 *Order* in Docket No. G022/M-13-730. Since then, Greater Minnesota has consistently filed its annual demand entitlement filings by August 1 of each year.

In its *Petition*, Greater Minnesota requested that the Commission accept the following changes in the Company's overall level of contracted capacity.

Greater Minnesota's Proposed Total Entitlement Changes	
Type of Entitlement	**Proposed Changes Increase (decrease) (Dekatherms (Dth))[1]**
TF-12	500
Viking Forward Haul (FT-Zone 1)	350

The Company's proposal would increase the Company's proposed design-day (winter) capacity by 850 Dth/day from 12,509 Dth/day to 13,359 Dth/day.

The Company did not add capacity specifically for non-peak periods (*e.g.,* summer months); however, the contracts that Greater Minnesota added are 12-month contracts, meaning these volumes are available for the entire calendar year, and the Company can call on these volumes to serve both peak and non-peak demand.

[1] Dekatherms (Dth).

The Department discusses the various effects of the entitlement changes on the Company's rates for different customer classes below; however, Greater Minnesota's proposal would increase capacity and decrease demand rates for residential heating customers by $4.18 for customers using 68 Dth per year.[2] This average consumption number appears somewhat small but appears driven by lower actual usage in the previous year as Greater Minnesota has varied this number in previous demand entitlement filings. The Company may wish to investigate basing this number of weather normalized sales figures in future demand entitlement filings.

The Company described the factors contributing to the need for changing the level of demand entitlements as follows:

- Insure that the Company has sufficient reserve to meet its customers' need;
- Account for growth on the system; and
- Account for changes in the design-day calculation method.

The Department reviews Greater Minnesota's *Petition* in greater detail below.

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

The Department's analysis of the Company's request includes the following sections:

- the proposed overall demand entitlement level;
- the design-day requirement;
- the reserve margin; and
- the Purchased Gas Adjustment (PGA) cost recovery proposal.

A. THE COMPANY'S DEMAND ENTITLEMENT LEVEL

1. Proposed Overall Demand Entitlement Level

As indicated in DOC Attachment 2, the Company proposed to increase its total entitlement level in Dth as follows:

Previous Entitlement (Dth)	Proposed Entitlement (Dth)	Entitlement Changes (Dth)	% Change From Previous Year
12,509	13,359	850	6.80

[2] The Department notes that Greater Minnesota used an average residential customer consumption figure of 94 Dth per year in its last demand entitlement filing.

The Department analyzes below the proposed changes, the proposed design-day requirement, and proposed reserve margin. The Department concludes that the Company's proposed recovery of overall demand costs is reasonable.

2. Design-Day Requirement

In past demand entitlement filings, Greater Minnesota employed a two-part design-day process to calculate its peak day sendout. In last year's demand entitlement filing, the Department identified potential concerns with the Company's peak-day regression analysis and recommended that Greater Minnesota address these going-forward. Specifically, the Department recommended that the Company maintain, on a going-forward basis, a two-part design-day process involving both regression analysis and mathematical analysis based on the Company's historical all-time peak day sendout until such time that Greater Minnesota has sufficient historical load data beyond the 2012-2013 heating season; and that the Company explore segregating its linear regression modeling into two components for large and smaller firm customers.

The Department reviewed the Company's *Petition* and concludes that Greater Minnesota continued to use a two-stage estimation process; however, the regression analysis and assumptions used by the Company are different than previous demand entitlement filings.

First, Greater Minnesota modified its weather data assumptions. In previous filings, the Company used Ordinary Least Squares (OLS) regression to calculate the projected design day for Greater Minnesota's service territory using four separate regression models, one for each area the Company serves (Mankato, Faribault, Shakopee, and Swanville), assuming area-specific weather parameters and Town Border Station (TBS) data. However, since Greater Minnesota now has service territory spread out over many TBSs in different parts of the state, the Company used weather data from Minneapolis, which Greater Minnesota stated is a methodology similar to that used by other, larger, utilities in Minnesota.

Second, the Company's OLS regression only uses data from the 2015-2016 heating season, specifically the months of January, February, and March. In last year's demand entitlement filing, Greater Minnesota used data from the four previous heating seasons to estimate peak-day usage. In the instant *Petition*, Greater Minnesota explained that it began its analysis by using data from the previous three heating seasons; however, when reviewing the results of this analysis the Company concluded that the results were too low and may put customers at risk during a peak-day situation. The Company surmised that the low estimates may be related to the fact that larger customers were added over the last two years and the longer term regression analysis was skewed downward; in other words, the longer estimation period did not properly account for these new, larger customers. In response, Greater Minnesota conducted the three-month regression analysis. The Company stated that this approach is appropriate because it relies on the most recent data available and most accurately reflects actual customer usage from current customers. In addition, Greater Minnesota explained that it did not include data from the first two months of the

2015-2016 heating season because they were abnormally warm and could put ratepayers at risk if weather during the 2016-2017 heating is seasonable.

Third, in response to the Department's recommendation to explore separate regression models for smaller and larger firm customers, Greater Minnesota calculated its design-day in this proceeding based on separate residential customer and commercial customer regression models. In previous filings, the Company used four separate regression models, one for each area the Company serves (Mankato, Faribault, Shakopee, and Swanville), based on total firm usage.

After reviewing the changes made to Greater Minnesota's design-day methodology, the Department has identified concerns with these changes; however, these concerns are not significant at this time and can be addressed in future demand entitlement filings. First, the Department is concerned with the length of the estimation period used by Greater Minnesota. The Department appreciates the Company's explanation for why it employed a shorter estimation period, and understands Greater Minnesota's decision in light of the under-estimation issues identified in previous demand entitlement filings, but a three-month estimation period may not be sufficient to ensure fully robust peak-day estimates. However, as discussed in greater detail below, the Department concludes that Greater Minnesota likely has sufficient entitlements, at this time, to serve firm customers on a Commission-prescribed peak day (90 Heating Degree Days (HDD)). In addition, the Company's reasons for using a shorter timeframe, older data not including usage by new commercial customers, will likely diminish, or disappear, in future demand entitlement filings. The Department recommends that Greater Minnesota continue to estimate its design day with data from multiple heating seasons when appropriate. If the results of these calculations are not acceptable, the Department recommends that the Company fully explain its decision to use a shorter estimation period in its initial filing.

Second, Greater Minnesota's use of Minneapolis weather data may not be entirely appropriate for the Company's system. The Department's current understanding is that the Greater Minnesota system is generally comprised of two distinct service areas: its "historical" area located in Southcentral Minnesota in the St. Peter Area, and its "newer" area located generally in Central Minnesota along the Viking Natural Gas Pipeline. Given the Company's decision to use separate residential and commercial regression models, and potential data availability issues for the separate service areas, the Department concludes that the use of Minneapolis weather data is acceptable at this time. However, in the future, as additional consumption data are collected, the Department recommends that Greater Minnesota explore the use of separate regression analyses by service area, using area-specific weather. The Department is available to work with Greater Minnesota to identify appropriate weather stations.

The Department reviewed the results of this year's design-day analysis, compared these results to last year's demand entitlement filing, and also reviewed Greater Minnesota's discussion and support for its changes in design-day analysis. The Company's analysis used

in this filing resulted in higher estimated peak-day consumption compared to Greater Minnesota's previous design-day method. This increase in estimated peak-day consumption is not unexpected given the shorter, recent timeframe used to estimate demand and it is also, potentially, encouraging given the Department's extensive discussion in its June 2, 2015 *Comments* in Docket No. G022/M-15-285 (15-285 Docket). In those *Comments*, the Department analyzed historical consumption data and observed that Greater Minnesota's peak day estimates exhibited a trend, over time, of under-estimating consumption, which may place firm ratepayers at risk in the event on an all-time peak day. The Department concluded in the 15-285 Docket that this under-estimation bias was likely driven by a shift in the Company's firm customer base from primarily residential (lower use per customer) to a more diversified customer base including greater numbers of larger commercial customers (higher use per customer). Therefore, the higher peak demand, based on separate residential and commercial regression models, calculated by the Company in this proceeding likely helped alleviate some of the under-estimation concerns discussed by the Department in the 15-285 Docket.

In addition to linear regression, it is also possible to estimate peak-day consumption using a mathematical analysis. In the instance where the design-day regression methodology is changed, as occurred in this docket, the use of a mathematical analysis as an accuracy check is important. The mathematical analysis uses firm use per customer on an all-time peak day multiplied by the projected number of firm customers. As with any method of estimation, there are pros and cons to the mathematical approach. This method is simple, easy to calculate, and is based on an actual, historical events. However, since it is based on an actual event, temperatures on the all-time peak day might not correspond with an exceptionally cold day. Further, if the all-time peak day happened years in the past, consumption on a present peak day may not be the same due to changes in technology and other factors affecting energy use. Given that Greater Minnesota's all-time peak day happened during the last heating season (2015-2016 heating season), the mathematical approach is acceptable since consumption characteristics are likely similar to what will be expected during the 2016-2017 heating season.

Using the use-per-customer mathematical analysis on Greater Minnesota's all-time peak day (1.429 Dth/customer), the Company's projected firm customer count during the 2015-2016 heating season, and an escalation to account for the fact that Greater Minnesota's all-time peak day occurred on a day 17 Heating Degree Days (HDD) warmer than a Commission-prescribed peak day of 90 HDD, the mathematical approach results in an estimated design-day of 13,185 Dth/day, which is 621 Dth/day, or 4.9 percent, greater than Greater Minnesota's estimated result based on its regression analysis. The result using the mathematical method is also 174 Dth/day less than the proposed total entitlement procured by the Company, which suggests that the Company has sufficient entitlements to serve firm customers.

Based on its analysis, the Department concludes that Greater Minnesota's design-day analysis is acceptable at this time and will likely result in sufficient entitlements to serve firm customers on a peak day. As noted above, the Department does have concerns with the Company's analysis but concludes that these concerns are not significant at this time. To the extent possible, the Department will work with Greater Minnesota to address these concerns on a going forward basis.

4. Reserve Margin

As indicated in DOC Attachment 2, the reserve margin, as proposed by the Company, is as follows:

Total Entitlement (Dth)	Design-day Estimate (Dth)	Difference (Dth)	Reserve Margin %	% Change From Previous Year[3]
13,359	12,564	795	6.30%	(1.39)%

The figures in the above table include design-day estimates from the Company's two customer-type (*i.e.,* customer class) regression models. The reserve margin is necessary since it provides an extra cushion which helps ensure firm reliability on a peak day; however, carrying too great a reserve margin results in customers paying higher demand costs than are necessary to provide reasonable service.

The Department has generally used a 5 percent reserve margin as an indicator of an adequate reserve margin, and the Company proposed a reserve margin that is above 5 percent. However; for Greater Minnesota, the Department has recommended, in previous demand entitlement filings, that the Commission accept higher reserve margins given the system dynamics, the higher level of growth experienced by this utility, and the fact that Greater Minnesota is a small utility with limited operational history. Further, as shown at Page 6 of the Company's initial filing, when the mathematical approach is used to estimate design-day consumption the estimate results in a reserve margin of approximately 1.3 percent. Given these reserve margin calculations and the discussion and conclusions in the previous section of these *Comments*, the Department concludes that the Company's proposed reserve margin is acceptable in this proceeding.

5. The Company's PGA Cost Recovery Proposal

The demand entitlement amounts listed in DOC Attachment 1 represent the demand entitlements for which the Company's firm customers will pay. In Attachment D Page 1 of 5 to its *Petition*, the Company compared its June 2016 Purchased Gas Adjustment (PGA), assuming no demand entitlement changes, to its expected November 2016 PGA with the

[3] As shown on DOC Attachment 2, the Company's average reserve margin since 1996 is 13.07 percent.

Company's proposed changes as a means of calculating the bill impact of its proposed changes. According to the Company, Greater Minnesota's demand entitlement proposal would result in the following annual rate impacts:

- Annual bill decrease of $4.18, or approximately 2.14 percent, for the average Residential customer consuming 68.0 Dth annually; and
- Annual bill decrease of $202.02, or approximately 2.14 percent, for the average Commercial and Industrial Firm customer consuming 3,286.5 Dth annually.

Subject to possible changes in anticipated entitlements between now and November 1, 2016, the Department recommends that the Commission allow recovery of associated demand costs effective November 1, 2016. Given the possibility of changes in final entitlements, and costs, the Department also recommends that Greater Minnesota make a supplemental filing on November 1, 2016 with final demand costs.

III. THE DOC'S RECOMMENDATIONS

The Department recommends that the Commission:

- Approve Greater Minnesota's proposed level of demand entitlements, subject to any possible changes in anticipated entitlements between the filing of these *Comments* and November 1, 2016, as shown in the Company's *Petition*; and
- Allow Greater Minnesota to recover associated demand costs, subject to any possible changes in anticipated entitlements between the filing of these *Comments* and November 1, 2016, through the monthly Purchased Gas Adjustment effective November 1, 2016.

The Department also recommends that the Commission require Greater Minnesota to undertake the following in future demand entitlement filings:

- Estimate its design day using data from multiple heating seasons when appropriate. If the results of these calculations are not acceptable, the Department recommends that the Company fully explain its decision to use a shorter estimation period in its initial filing;
- In the future, as additional consumption data are collection, Greater Minnesota should explore the use of separate regression analyses by service area, using area-specific weather; and
- maintain, on a going-forward basis, a two-part design-day process involving both regression analysis and mathematical analysis based on the Company's historical all-time peak-day sendout.

Given the possibility of changes in final entitlements, and costs, the Department also recommends that the Commission require Greater Minnesota to make a supplemental filing on, or about, November 1, 2016 detailing final demand entitlements and costs.

/ja

DOC Attachment 1
Details of Greater Minnesota Gas's Demand Entitlements Historical and Current Proposal

2013-2014 Heating Season (Initial)	Quantity (Mcf)	Change in Quantity
TF-7 (Apr.-Oct.)	0	0
TF12 (Nov.-Oct.)	630	420
TFX-5 (Nov.-Mar.)	270	180
TFX-5 (Nov.-Mar.)	6,844	500
Viking Zone 1	2,000	0
Delivery Contract	950	0
TFX (Apr. and Oct.)	665	0
Viking Forward Haul	0	0
TF5 (Nov.-Mar.)	0	0
TFX (Nov.-Mar.)	0	(665)
SMS	1,300	0
Total Demand Entitlement	9,359	2,280
Total Transportation	11,359	(200)
Total Annual Transportation		0
Total Seasonal Transport	9,359	2,280
Percent Annual on Greater Minnesota System	0.00%	0.00%
Percent Seasonal on Greater Minnesota System	82.39%	20.98%

2013-2014 Heating Season (Final)	Quantity (Mcf)	Change in Quantity
TF-7 (Apr.-Oct.)	0	0
TF12 (Nov.-Oct.)	210	(420)
TFX-5 (Nov.-Mar.)	0	(270)
TFX-5 (Nov.-Mar.)	6,344	(500)
Viking Zone 1	2,000	0
Delivery Contract	950	0
TFX (Apr. and Oct.)	665	0
Viking Forward Haul	0	0
TF5 (Nov.-Mar.)	90	90
Viking Forward Haul/Emerson	1,300	1,300
SMS	1,300	0
Total Demand Entitlement	9,559	200
Total Transportation	11,559	200
Total Annual Transportation		0
Total Seasonal Transport	9,559	200
Percent Annual on Greater Minnesota System	0.00%	0.00%
Percent Seasonal on Greater Minnesota System	82.70%	0.30%

2014-2015 Heating Season (November-January)	Quantity (Mcf)	Change in Quantity
TF-7 (Apr.-Oct.)	0	0
TF12 (Nov.-Oct.)	210	0
TFX-5 (Nov.-Mar.)	0	0
TFX-5 (Nov.-Mar.)	6,344	0
Viking Zone 1	2,000	0
Delivery Contract	950	0
TFX (Apr. and Oct.)	665	0
Viking Forward Haul	0	0
TF5 (Nov.-Mar.)	90	0
Viking Forward Haul/Emerson	1,400	100
SMS	2,000	700
Total Demand Entitlement	9,659	100
Total Transportation	11,659	100
Total Annual Transportation		0
Total Seasonal Transport	11,659	2,100
Percent Annual on Greater Minnesota System	0.00%	0.00%
Percent Seasonal on Greater Minnesota System	100.00%	17.30%

2014-2015 Heating Season (February-March)	Quantity (Mcf)	Change in Quantity
TF-7 (Apr.-Oct.)	0	0
TF12 (Nov.-Oct.)	210	0
TFX-5 (Nov.-Mar.)	0	0
TFX-5 (Nov.-Mar.)	6,344	0
Viking Zone 1	2,000	0
Delivery Contract	950	0
TFX (Apr. and Oct.)	665	0
Viking Forward Haul	1,200	1,200
TF5 (Nov.-Mar.)	90	0
Viking Forward Haul/Emerson	1,400	0
SMS	2,000	0
Total Demand Entitlement	10,859	1,200
Total Transportation	12,859	1,200
Total Annual Transportation		0
Total Seasonal Transport	12,859	1,200
Percent Annual on Greater Minnesota System	0.00%	0.00%
Percent Seasonal on Greater Minnesota System	100.00%	0.00%

2015-2016 Heating Season	Quantity (Mcf)	Change in Quantity
TF-7 (Apr.-Oct.)	0	0
TF12 (Nov.-Oct.)	210	0
TFX-5 (Nov.-Mar.)	0	0
TFX-5 (Nov.-Mar.)	6,344	0
Viking Zone 1	2,000	0
Delivery Contract	0	(950)
Non-Recallable Capacity Release	2,600	2,600
TFX (Apr. and Oct.)	665	0
Viking Forward Haul	1,200	0
TF5 (Nov.-Mar.)	90	0
Viking Forward Haul/Emerson	1,400	0
SMS	2,000	0
Total Demand Entitlement	12,509	1,650
Total Transportation	14,509	1,650
Total Annual Transportation		0
Total Seasonal Transport	14,509	1,650
Percent Annual on Greater Minnesota System	0.00%	0.00%
Percent Seasonal on Greater Minnesota System	100.00%	0.00%

2015-2016 Heating Season	Quantity (Mcf)	Change in Quantity
TF-7 (Apr.-Oct.)	0	0
TF12 (Nov.-Oct.)	710	500
TFX-5 (Nov.-Mar.)	0	0
TFX-5 (Nov.-Mar.)	6,344	0
Viking Zone 1	2,000	0
Delivery Contract	0	0
Non-Recallable Capacity Release	2,600	0
TFX (Apr. and Oct.)	665	0
Viking Forward Haul	1,550	350
TF5 (Nov.-Mar.)	90	0
Viking Forward Haul/Emerson	1,400	0
SMS	2,000	0
Total Demand Entitlement	13,359	850
Total Transportation	15,359	850
Total Annual Transportation		0
Total Seasonal Transport	15,359	850
Percent Annual on Greater Minnesota System	0.00%	0.00%
Percent Seasonal on Greater Minnesota System	100.00%	0.00%

DOC Attachment 2
Details of Greater Minnesota Gas's Demand Entitlements Historical and Current Proposal

	Number of Firm Customers			Design Day Requirement			Total Entitlement ÷ Peak Shaving ÷ Peak Shaving			Reserve Margin
	(1)	(2)	(3)	(4)	(5)	(6)	2013-2014 Heating Season	(8)	(9)	(10)
Heating Season	Number of Design Day Customers	Change from Previous Year	% Change From Previous Year	Design Day (Mcf)	Change from Previous Year	% Change From Previous Year	Total Entitlement (Mcf)	Change from Previous Year	% Change From Previous Year	% of Reserve Margin [(7)-(4)]/(4)
2016-2017	7482	839	12.63%	12564	1,438	12.92%	13359	850	6.80%	6.33%
2015-2016	6,643	791	13.52%	11126	2,157	24.05%	12,509	2,850	29.51%	12.43%
2014-2015	5,852	547	10.31%	8,969	52	0.58%	9,659	100	1.05%	7.69%
2013-2014	5,305	531	11.12%	8,917	3,953	79.63%	9,559	4,350	83.51%	7.20%
2012-2013	4,774	558	13.24%	4,964	514	11.55%	5,209	165	3.27%	4.94%
2011-2012	4,216	296	7.55%	4,450	0	0.00%	5,044	0	0.00%	13.35%
2010-2011	3,920	198	5.32%	4,450	239	5.68%	5,044	500	11.00%	13.35%
2009-2010	3,722	162	4.55%	4,211	(71)	-1.66%	4,544	300	7.07%	7.91%
2008-2009	3,560	182	5.39%	4,282	566	15.23%	4,244	244	6.10%	-0.89%
2007-2008	3,378	170	5.30%	3,716	166	4.68%	4,000	350	9.59%	7.64%
2006-2007	3,208	237	7.98%	3,550	583	19.65%	3,650	350	10.61%	2.82%
2005-2006	2,971	290	10.82%	2,967	270	10.01%	3,300	300	10.00%	11.22%
2004-2005	2,681	336	14.33%	2,697	697	34.85%	3,000	600	25.00%	11.23%
2003-2004	2,345	181	8.36%	2,000	(200)	-9.09%	2,400	(200)	-7.69%	20.00%
2002-2003	2,164	300	16.09%	2,200	400	22.22%	2,600	400	18.18%	18.18%
2001-2002	1,864	301	19.26%	1,800	400	28.57%	2,200	500	29.41%	22.22%
2000-2001	1,563	393	33.59%	1,400	300	27.27%	1,700	300	21.43%	21.43%
1999-2000	1,170	279	31.31%	1,100	250	29.41%	1,400	150	12.00%	27.27%
1998-1999	891	289	48.01%	850	350	70.00%	1,250	750	150.00%	47.06%
1997-1998	602	339	128.90%	500	200	66.67%	500	200	66.67%	0.00%
1996-1997	263	263		300	300		300	300		
Average Change Per Year:			20.38%			22.61%			24.67%	13.07%

Firm Peak Day Sendout

Heating Season *	(11) Firm Peak Day Send out (Mcf)	Change from Previous Year	% Change From Previous Year	Excess per Customer [(7) - (4)]/(1)	Design Day per Customer (4)/(1)	Entitlement per DD Customer (7)/(1)	Peak Day Sendout per DD Customer (11)/(1)
2016-2017				0.1063	1.6792	1.7855	
2015-2016	9495	1,126	13.45%	0.2082	1.6748	1.8830	1.4293
2014-2015	8369	489	6.21%	0.1179	1.5326	1.6505	1.4301
2013-2014	7,880	2,855	56.82%	0.1210	1.6809	1.8019	1.4854
2012-2013	5,025	1,368	37.41%	0.0513	1.0398	1.0911	1.0526
2011-2012	3,657	(248)	-6.35%	0.1409	1.0555	1.1964	0.8674
2010-2011	3,905	251	6.87%	0.1515	1.1352	1.2867	0.9962
2009-2010	3,654	(374)	-9.29%	0.0895	1.1314	1.2208	0.9817
2008-2009	4,028	(72)	-1.76%	(0.0107)	1.2028	1.1921	1.1315
2007-2008	4,100	550	15.49%	0.0841	1.1001	1.1841	1.2137
2006-2007	3,550	738	26.24%	0.0312	1.1066	1.1378	1.1066
2005-2006	2,812	285	11.28%	0.1121	0.9987	1.1107	0.9465
2004-2005	2,527	185	7.90%	0.1130	1.0060	1.1190	0.9426
2003-2004	2,342	587	33.45%	0.1706	0.8529	1.0235	0.9987
2002-2003	1,755	747	74.11%	0.1848	1.0166	1.2015	0.8110
2001-2002	1,008	(180)	-15.15%	0.2146	0.9657	1.1803	0.5408
2000-2001	1,188	291	32.44%	0.1919	0.8957	1.0877	0.7601
1999-2000	897	95	11.85%	0.2564	0.9402	1.1966	0.7667
1998-1999	802	397	98.02%	0.4489	0.9540	1.4029	0.9001
1997-1998	405	233	135.47%	0.0000	0.8306	0.8306	0.6728
1996-1997	172	172		0.0000	1.1407	1.1407	0.6540
Average Change Per Year:			28.13%	0.1325	1.1400	1.2725	0.9844

CERTIFICATE OF SERVICE

I, Linda Chavez, hereby certify that I have this day served copies of the following document on the attached list of persons by electronic filing, 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 Nos. **G022/M-16-522**

Dated this **20th** day of **September, 2016**.

/s/Linda Chavez

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