



85 7th Place East, Suite 500, St. Paul, MN 55101-2198
main: 651.296.4026 tty: 651.296.2860 fax: 651.297.7891
www.commerce.state.mn.us

September 21, 2009

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

RE: **Supplemental Comments of the Minnesota Office of Energy Security**
Docket No. G007/M-08-1329

Dear Dr. Haar:

On August 12, 2009, Minnesota Energy Resources Corporation-NMU (MERC-NMU or Company) submitted its *Response Comments* to the Minnesota Office of Energy Security's (OES) June 17, 2009 *Response Comments* related to MERC-NMU's demand entitlement filing. Based on its review, the OES concludes that a response to MERC-NMU's *Response Comments* is necessary to establish a complete record in this matter. As such, the OES requests that that Minnesota Public Utilities Commission (Commission) accept these *Supplemental Comments* to MERC-NMU's *Response Comments*.

Based on its review of MERC-NMU's *Response Comments*, the OES recommends that the Commission:

- **approve** MERC-NMU's demand entitlement level without endorsing its design-day study analysis subject to the Commission's decision in the pending G007/M-07-1402 docket;
- **approve** MERC-NMU's proposed cost recovery proposal submitted on August 12, 2009, as modified by the OES, which moves FDD storage costs to the commodity cost recovery portion of the Purchased Gas Adjustment (PGA);
- **require** MERC-NMU to provide additional evidence supporting the estimative power of its design-day study in its next demand entitlement filing; and
- **require** MERC-NMU to refund to its ratepayers, through the true up factor, the difference between its proposed cost recovery proposal submitted on August 12, 2009 and MERC-NMU's cost recovery proposal submitted on November 5, 2008 and charged in its rates to its customers through the PGA since November 1, 2008.

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

Sincerely,

/s/ ADAM JOHN HEINEN
Rates Analyst
651-296-6329

AJH/ja
Attachment



BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

SUPPLEMENTAL COMMENTS OF THE
MINNESOTA OFFICE OF ENERGY SECURITY

DOCKET NOS. G007/M-08-1329

I. BACKGROUND

The following rounds of comments have been submitted to the Minnesota Public Utilities Commission (Commission) in Minnesota Energy Resources Corporation-NMU's (MERC-NMU or Company) 2008-2009 demand entitlement filing:

- November 1, 2008, MERC-NMU's initial *Petition*;
- November 5, 2008, MERC-NMU's *Supplement*;
- March 4, 2009, Minnesota Office of Energy Security's (OES) *Comments*;
- March 30, 2009, MERC-NMU's *Reply Comments*;
- June 17, 2009, OES's *Response Comments*;
- August 12, 2009, MERC-NMU's *Response Comments*; and
- September 21, 2009, OES's *Supplemental Comments*.

In its August 12, 2009 *Response Comments*, MERC-NMU provided additional information and responded to concerns raised by the OES in its June 17, 2009 *Response Comments*. The OES requested additional information to allow the OES to assess the reasonableness of MERC-NMU's proposal. The OES discusses the Company's responses below.

II. THE OES'S RESPONSE TO MERC-NMU'S AUGUST 12, 2009 RESPONSE COMMENTS

In its August 12, 2009 *Response Comments*, MERC-NMU responded to the OES's discussions of MERC-NMU's Design-Day Methodology, Peak-Day Weather Assumptions, the Purchased Gas Adjustment (PGA) system performance during the 2008-2009 Heating Season, and its Treatment of FDD Storage Costs. These topics are discussed in greater detail, separately, below.

A. *DESIGN-DAY METHODOLOGY*

In terms of its Design-Day Methodology, MERC-NMU provided additional discussion in its *Response Comments* about the Commission's decision in the Company's most recent rate case, Docket No. G007,011/GR-08-835, to approve MERC-NMU's proposal that all interruptible and transportation customers be required to install telemetry equipment. The Company states that the use of telemetry equipment by all of its interruptible and transportation customers will provide it with more detailed data which will make its future design-day calculations more realistic. MERC-NMU also states that it agrees that a meeting with the OES would be helpful to discuss further the Company's design-day methodology. Based on this information, the OES agrees to work with the Company to arrange a meeting in the near future.

B. *PEAK-DAY WEATHER ASSUMPTIONS*

In its August 12, 2009 *Response Comments*, MERC-NMU responds to the OES's discussion of Commission Staff's concern with the use of wind adjusted heating degree days (HDDs) as was discussed in Docket No. G022/M-07-1142. In its response, MERC-NMU states that through its regression analysis, it has been its experience that there is a stronger correlation between wind adjusted HDDs and natural gas consumption compared to regular HDDs and natural gas consumption. According to MERC-NMU, this stronger correlation leads the Company to believe that wind adjusted HDDs are a better indicator of customer consumption. This correlation may be due to a variety of factors, such as draftiness in buildings. Based on this evidence, the Company states that it is willing to further discuss this issue in a meeting with the OES and Commission Staff. After reviewing the discussion provided by MERC-NMU, the OES believes that a meeting would be reasonable and agrees to work with the Company and Commission Staff to arrange a meeting in the near future.

C. *PGA SYSTEM PERFORMANCE DURING THE 2008-2009 HEATING SEASON*

In its June 17, 2009 *Response Comments*, the OES raised concerns related to MERC-NMU's PGA system performance during the 2008-2009 heating season. In particular, the OES noted two areas of concern about system performance during the 2008-2009 heating season. First, based on its analysis, the OES noted that there was significantly more natural gas use on the Company's system than anticipated on days during the past heating season that had temperatures warmer than the Commission's peak-day standard. This information indicates that MERC-NMU may not have had sufficient capacity to serve firm customers if conditions had reached the Commission's prescribed peak-day standard. Second, based on its review of the Company's *Reply Comments*, the OES was unclear as to whether MERC-NMU had access to different options from Northern Natural Gas (Northern) to serve firm customers on a peak day.

In its August 12, 2009 *Response Comments*, MERC-NMU states, in response to the OES's first area of concern, that the Company has the capability to call transportation customers to reduce their gas use to their Maximum Daily Quantity (MDQ) to maintain necessary operational

integrity. In terms of the OES's second area of concern, MERC-NMU states that it has the ability to purchase delivered services at various citygates. In addition, the Company states that it is willing to discuss reasonable changes to its design-day forecast methodology, including the estimative power of its design day study, as requested in the OES's *Comments* and *Response Comments*. Related to the OES's request for additional documentation of the "estimative power of its design-day study," MERC-NMU also requests clarification on the specific metrics or measures, including formats and calculations, that the OES is requesting as part of this discussion, and, as such, the Company believes that it would be helpful to meet with the OES to further discuss MERC-NMU's design-day methodology.

Based on its review of MERC-NMU's August 12, 2009 *Response Comments*, the OES remains concerned about MERC-NMU's ability to serve firm customer on a peak-day. However, given the commitments laid out by the Company in its *Response Comments*, the OES is confident that the MERC-NMU is committed to serving its firm customers on a peak day. Considering the lack of system reliability issues during the previous heating season, the OES concludes that the Company has reasonably addressed this issue in this docket but agrees with the Company that it is necessary to discuss this issue soon. In terms of a meeting to further discuss MERC-NMU's design-day methodology, the OES agrees that some clarification of its requests would be helpful and will work with the Company to arrange a meeting in the near future.

D. TREATMENT OF FDD STORAGE COSTS

In its June 17, 2009 *Response Comments* the OES stated that it was unable to replicate MERC-NMU's demand cost recovery figure (using the firm sales figure in the Company's original filing) provided in its March 30, 2009 *Reply Comments* related to the shifting of FDD Storage Costs from the demand to commodity cost recovery portion of the PGA. In its August 12, 2009 *Response Comments*, MERC-NMU states that it provided a revised Attachment 4, page 1 of 2, and a revised Attachment 7, in its March 30, 2009 *Reply Comments*, that showed the effects of moving the FDD storage costs from the demand cost to the commodity cost recovery portion of the PGA. However, after reviewing the OES's June 17, 2009 *Response Comments*, MERC-NMU noticed that it failed to provide a revised page 2 of its Attachment 4 provided in its *Reply Comments*. In response to this oversight, the Company provides in its August 12, 2009 *Response Comments*, a fully revised Attachment 4 and exhibits supporting its calculations and the effects of moving FDD Storage Costs to the commodity cost recovery portion of the PGA. MERC-NMU also notes that the Commission has not approved the shifting of FDD costs from the demand recovery to the commodity cost recovery portion of the PGA. The Company further states that if the Commission does approve this shift, the Company, OES, and Commission Staff should work together to develop a process which will credit General Service customers for the collection of FDD Storage Costs through the demand recovery portion of the PGA.

Based on its review of the supporting information provided in MERC-NMU's *Response Comments*, and using the new total demand sales number of 5,464,591 Mcf calculated in Docket No. G007,011/MR-08-836, the OES is able to replicate the Company's demand cost recovery figure that includes the shift of FDD Storage Costs from the demand to commodity cost recovery portion of the monthly PGA. However, while reviewing MERC-NMU's calculation of cost relating to its FDD storage contracts, the OES observed that these costs were calculated using an unknown sales figure. Using the same technique applied by the Company in its companion MERC-PNG Northern filing (Docket No. G011/M-08-1328), the OES and the Company determined these costs using the new total firm sales figure of 6,677,305 Mcf presented in Docket No. G007,011/MR-08-836. This calculation results in a different FDD storage cost estimate, which is presented in OES Attachment S-2. Given these changes in cost calculation, the OES presents a modified cost recovery proposal below.

The OES acknowledges the Company's request for a discussion about a process to credit customers for the shift in the recovery of FDD Storage Costs from the demand to commodity cost recovery portion of the PGA, if approved by the Commission. The OES notes, however, that such discussion should be limited to the calculation of the refund rather than a discussion as to whether a refund is appropriate. Minnesota Rule 7825.2700 (Purchase Gas Charges, Automatic Adjustment), allows regulated utilities the ability to true-up costs at the end of the fiscal year. Given the existing true-up structure, the OES would not object to MERC-NMU moving the costs related to FDD storage from demand cost recovery to commodity cost recovery, with appropriate notation, subject to the annual true-up.

III. THE OES'S REQUEST THAT MERC-NMU UPDATE ITS BASE GAS COST OF GAS TO REFLECT CHANGES TO ITS FT0011 CONTRACT

In its previous comments, the OES requested that MERC-NMU remove all costs and volumes related to the FT0011 contract from its latest update, and any other future updates, to the base cost of gas dated January 27, 2009, and to submit a revised base cost of gas calculation as part of its rate case compliance filing. On September 20, 2009, MERC-NMU filed its rate case compliance filing in Docket No. G007,011/GR-08-835. Since MERC-NMU has made this compliance filing, this requirement is no longer relevant. However, the OES will review the compliance filing for this information and will provide comments on the base cost of gas in its rate case compliance filing comments and in the miscellaneous tariff filing for MERC-NMU new base cost of gas figure.

IV. THE OES'S MODIFIED COST RECOVERY PROPOSAL

As discussed in the OES's June 17, 2009 *Response Comments*, the PGA cost recovery proposed by the OES includes the shifting of FDD Storage Costs from the demand to commodity cost recovery portion of the PGA. In addition, as originally noted in the OES's *Response Comments*, the bill impacts detailed below differ from the calculations in the Company's exhibits and

attachments to its August 12, 2009 *Response Comments* because the OES holds the weighted average cost of gas constant, so as to isolate the increases in total gas costs associated solely with the demand cost of gas. The OES's bill impacts are presented in Table S-1 below.

Table S-1 OES's Modified PGA Cost Recovery Proposal Monthly Rate Impact Compared to October 2008 PGA							
Customer Class	Commodity Change (\$/Mcf)	Commodity Change (Percent)	Demand Change (\$/Mcf)	Demand Change (Percent)	Total Change (\$/Mcf)	Total Change (Percent)	Effect on Annual Bill
General Service	\$(0.0536)	(0.80)	\$0.0302	3.06	\$(0.0234)	(0.24)	\$(3.34)
Large General Service	\$(0.0536)	(0.80)	\$0.0302	3.06	\$(0.0234)	(0.24)	\$(159.94)
Small Vol. Interruptible	\$(0.0536)	(0.80)	\$0.0000	0.00	\$(0.0536)	(0.71)	\$(427.60)
Large Vol. Interruptible	\$(0.0536)	(0.80)	\$0.0000	0.00	\$(0.0536)	(0.77)	\$(2,059.39)

Note: The changes in commodity costs presented in Table S-1 are the result of a decrease in MERC-NMU's FDD Storage levels and cost contracts.

As shown above, and in OES Attachment S-1, the OES's demand entitlement analysis results in the following estimated annual bill impacts:

- a decrease of approximately \$3.34, or 0.24 percent, for an average General Service customer who consumes 143 Mcf annually;
- a decrease of approximately \$159.94, or 0.24 percent, for an average Large General Service customer who consumes 6,838 Mcf annually;
- a decrease of approximately \$427.60, or 0.71 percent, for an average Small Volume Interruptible customer who consumes 7,982 Mcf annually; and
- a decrease of approximately \$2,059.39, or 0.77 percent, for an average Large Volume Interruptible customer who consumes 38,443 annually.

IV. OES RECOMMENDATIONS AND CONCLUSIONS

Based on its review of MERC-NMU's *Response Comments*, the OES recommends that the Commission:

- approve MERC-NMU's demand entitlement level without endorsing its design-day study analysis subject to the Commission's decision in the pending G007/M-07-1402 docket;

- approve MERC-NMU's proposed cost recovery proposal submitted on August 12, 2009, as modified by the OES, which moves FDD storage costs to the commodity cost recovery portion of the Purchased Gas Adjustment (PGA);
- require MERC-NMU to provide additional evidence supporting the estimative power of its design-day study in its next demand entitlement filing; and
 - require MERC-NMU to refund to its ratepayers, through the true-up factor, the difference between its proposed cost recovery proposal submitted on August 12, 2009 and MERC-NMU's cost recovery proposal submitted on November 5, 2008 and charged in its rates to its customers through the PGA since November 1, 2008.

/ja

OES Attachment S-1
Effect of MERC-NMU's Proposed Demand Entitlement Changes as Modified by the OES

	Last Rate Case	Last Demand Filing	October PGA 2008	October PGA with Proposed Demand Changes	% Change from Last Rate Case	% Change from Last Demand Filing	% Change from Oct. PGA	\$ Change from Oct. PGA
General Service	GR-03-1372	M-07-1402						
Commodity Cost	\$2.3640	\$6.9558	\$6.6836	\$6.6300	180.46%	-4.68%	-0.80%	(\$0.0536)
Demand Cost	\$1.3009	\$0.9923	\$0.9859	\$1.0161	-21.89%	2.40%	3.06%	\$0.0302
Margin	\$1.9411	\$1.9411	\$1.9411	\$1.9411	0.00%	0.00%	0.00%	\$0.0000
Total Cost of Gas	\$5.6060	\$9.8892	\$9.6106	\$9.5872	71.02%	-3.05%	-0.24%	(\$0.0234)
Average Annual Use	143	143	143	143				
Average Annual Cost of Gas	\$801.66	\$1,414.15	\$1,374.31	\$1,370.97	71.02%	-3.05%	-0.24%	(\$3.34)

	Last Rate Case	Last Demand Filing	October PGA 2008	October PGA with Proposed Demand Changes	% Change from Last Rate Case	% Change from Last Demand Filing	% Change from Oct. PGA	\$ Change from Oct. PGA
Large General Service	GR-03-1372	M-07-1402						
Commodity Cost	\$2.3640	\$6.9558	\$6.6836	\$6.6300	180.46%	-4.68%	-0.80%	(\$0.0536)
Demand Cost	\$1.3009	\$0.9923	\$0.9859	\$1.0161	-21.89%	2.40%	3.06%	\$0.0302
Margin	\$1.9411	\$1.9411	\$1.9411	\$1.9411	0.00%	0.00%	0.00%	\$0.0000
Total Cost of Gas	\$5.6060	\$9.8892	\$9.6106	\$9.5872	71.02%	-3.05%	-0.24%	(\$0.0234)
Average Annual Use	6,838	6,838	6,838	6,838				
Average Annual Cost of Gas	\$38,333.83	\$67,622.08	\$65,717.15	\$65,557.21	71.02%	-3.05%	-0.24%	(\$159.94)

	Last Rate Case	Last Demand Filing	October PGA 2008	October PGA with Proposed Demand Changes	% Change from Last Rate Case	% Change from Last Demand Filing	% Change from Oct. PGA	\$ Change from Oct. PGA
SV Interruptible Service	GR-03-1372	M-07-1402						
Commodity Cost	\$2.3640	\$6.9558	\$6.6836	\$6.6300	180.46%	-4.68%	-0.80%	(\$0.0536)
Commodity Margin	\$0.8500	\$0.8500	\$0.8500	\$0.8500	0.00%	0.00%	0.00%	\$0.0000
Total Cost of Gas	\$3.2140	\$7.8058	\$7.5336	\$7.4800	132.73%	-4.17%	-0.71%	(\$0.0536)
Average Annual Use	7,982	7,982	7,982	7,982				
Average Annual Cost of Gas	\$25,654.15	\$62,305.90	\$60,132.96	\$59,705.36	132.73%	-4.17%	-0.71%	(\$427.60)

	Last Rate Case	Last Demand Filing	October PGA 2008	October PGA with Proposed Demand Changes	% Change from Last Rate Case	% Change from Last Demand Filing	% Change from Oct. PGA	\$ Change from Oct. PGA
LV Interruptible Service	GR-03-1372	M-07-1402						
Commodity Cost	\$2.3640	\$6.9558	\$6.6836	\$6.6300	180.46%	-4.68%	-0.80%	(\$0.0536)
Commodity Margin	\$0.2850	\$0.2850	\$0.2850	\$0.2850	0.00%	0.00%	0.00%	\$0.0000
Total Cost of Gas	\$2.6490	\$7.2408	\$6.9686	\$6.9150	161.04%	-4.50%	-0.77%	(\$0.0536)
Average Annual Use	38,443	38,443	38,443	38,443				
Average Annual Cost of Gas	\$101,835.51	\$278,358.07	\$267,892.74	\$265,833.35	161.04%	-4.50%	-0.77%	(\$2,059.39)

October Change Summary	Commodity Change \$/Mcf	Commodity Change %	Demand Change \$/Mcf	Demand Change %	Total Change \$/Mcf	Total Change %	Average Annual Change
General Service	(\$0.0536)	-0.80%	\$0.0302	3.06%	(\$0.0234)	-0.24%	(\$3.34)
Large General Service	(\$0.0536)	-0.80%	\$0.0302	3.06%	(\$0.0234)	-0.24%	(\$159.94)
SV Interruptible Service	(\$0.0536)	-0.80%	\$0.0000	0.00%	(\$0.0536)	-0.71%	(\$427.60)
LV Interruptible Service	(\$0.0536)	-0.80%	\$0.0000	0.00%	(\$0.0536)	-0.77%	(\$2,059.39)

Note: The October commodity cost figure of \$6.6836 includes \$0.10577 in costs related to storage contracts per the Company's supplemental comments filed on April 7, 2008 in Docket No. G007/M-07-1402.

Note: The November commodity cost figure of \$6.6300 includes \$0.05222 in costs related to storage contracts per the Company's supplemental comments filed on April 7, 2008 in Docket No. G007/M-07-1402.

OES Attachment S-2
MERC-NMU's Rate Impact Analysis as Modified by the OES

	Entitlements	Rate	Multiplied by	Total Annual Cost	Per Mcf	Tariff No./contract
NNG Pipeline						
TF 12 B	2,653	\$7.5776	12	\$241,240.47	\$0.04415	Sheet No. 50
TF 12 V	6,643	\$9.0926	12	\$724,825.70	\$0.13264	Sheet No. 50
TF 5	5,451	\$15.1530	5	\$412,995.02	\$0.07558	Sheet No. 50
TFX 5	6,139	\$15.1530	5	\$465,121.34	\$0.08512	Sheet No. 50
LS Power	2,777	\$4.3463	3	\$36,209.03	\$0.00663	
TFX-Offpeak (Apr/Oct)	0	\$2.4333	1	\$0.00	\$0.00000	Contract
TFX-Offpeak (Apr/Oct)	0	\$5.6170	1	\$0.00	\$0.00000	Contract
TFX-Offpeak (Apr/Oct)	0	\$5.6170	7	\$0.00	\$0.00000	Contract
TFX-Offpeak (May-Sept)	0	\$5.6170	5	\$0.00	\$0.00000	Contract
Peak Capacity	0	\$4.5600	5	\$0.00	\$0.00000	Sheet Nos. 50 & 51
NNG Demand				\$1,880,391.55	\$0.34410	
NNG 3-Party demand						
Call Options Premium	0	\$0.0000	1	\$0.00	\$0.00000	Contract
Upstream Demand (Storage) Costs						
Great Lakes	0	\$3.4580	12	\$0.00	\$0.00000	Sheet 4
FDD-Storage Res	7,128	\$1.7140	12	\$146,608.70	\$0.02196	Sheet No. 55
FDD-Storage Cycle Vol	82,188	\$0.3567	5	\$146,582.30	\$0.02195	Sheet No. 55
FDD LS	328	\$1.7140	12	\$6,746.30	\$0.00101	
FDD LS	3,779	\$0.3567	5	\$6,739.85	\$0.00101	
FDD-Reservation	524	\$3.3157	12	\$20,849.12	\$0.00312	
FDD-Storage Cycle	6,047	\$0.6901	5	\$20,865.17	\$0.00312	
Nexen Storage Capacity	0	\$0.5683	1	\$0.00	\$0.00000	Contract
NGPL	0	\$0.4908	1	\$0.00	\$0.00000	Contract
NNG Storage				\$348,391.45	\$0.05218	
Viking Pipeline						
FTA	7,966	\$3.4671	12	\$331,427.02	\$0.06065	Viking Sheet No. 5B
FT-A Zone 1-1 Backhaul	5,902	\$3.7671	5	\$111,167.12	\$0.02034	Viking Sheet No. 5D
NNG TF12 Chisago (112495)	926	\$7.5776	12	\$84,202.29	\$0.01541	Sheet No. 50
NNG TF5 Chisago (112486)	2,089	\$15.1530	5	\$158,273.09	\$0.02896	
NNG TFX5 Chisago (112495)	563	\$15.1530	5	\$42,655.70	\$0.00781	Sheet No. 50
NNG TFX12 Chisago (112486)	2,324	\$9.6288	12	\$268,527.97	\$0.04914	
DDS	0	\$1.0000	12	\$0.00	\$0.00000	Viking Sheet No. 5H
Tenaska PSO	0	\$1.0500	1	\$0.00	\$0.00000	Contract
VGT Demand				\$996,253.19	\$0.18231	
GLGT Pipeline						
FT-0016	10,130	\$3.4580	12	\$420,354.48	\$0.07692	GLGT Sheet 4
FT-0155-12	1,178	\$3.4580	12	\$48,882.29	\$0.00895	
FT-0155-5	2,138	\$3.4580	5	\$36,966.02	\$0.00676	GLGT Sheet 4
T	4,000	\$3.4580	12	\$165,984.00	\$0.03037	
Tenaska PSO	0	\$1.0500	1	\$0.00	\$0.00000	Contract
Nexen Storage	0	\$0.5683	1	\$0.00	\$0.00000	
GLGT Demand				\$672,186.79	\$0.12301	
CENTRA Pipeline						
CENTRA Transmission (\$cdn/103M3)		\$166.3160				
Centra Transmission	9,858	\$4.5328	12	\$536,212.11	\$0.09812	Sheet 1 (N.E.B.)
CENTRA-Boise	0	\$13.5000	4	\$0.00	\$0.00000	Contract
Tenaska PSO	0	\$0.0000	1	\$0.00	\$0.00000	Contract
Union Balancing	9,858	\$0.4565	12	\$54,002.12	\$0.00988	Contract
Centra MN Pipelines	9,858	\$1.2311	12	\$145,634.21	\$0.02665	Sheet 4
Centra Demand				\$735,848.44	\$0.13466	
Exchange and Balancing Agreements						
Nexen Exchange	684,604	\$1.7700	1	\$1,211,749.08	\$0.22175	Contract
Tenaska PSO	0	\$2.0035	1	\$0.00	\$0.00000	
SMS	2,143	\$2.1800	12	\$56,060.88	\$0.01026	
Total Exchange and Balancing				\$1,267,809.96	\$0.23200	
TOTAL DEMAND				\$5,552,489.93	\$1.01609	
TOTAL STORAGE (Calculated as Commodity)				\$348,391.45	\$0.05218	

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, 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 Office of Energy Security
Supplemental Comments**

Docket No. G007/M-08-1329

Dated this 21st day of **September, 2009**

/s/Sharon Ferguson

Service List Name	First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret
OFF_SL_08-1329_1	Burl W.	Haar	burl.haar@state.mn.us	MN Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes
OFF_SL_08-1329_1	Gregory J.	Walters	gjwalters@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	P.O. Box 6538 Rochester, MN 559036538	Paper Service	No
OFF_SL_08-1329_1	John	Lindell	agorud.ecf@state.mn.us	OAG-RUD	900 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No
OFF_SL_08-1329_1	Julia	Anderson	Julia.Anderson@state.mn.us	MN Office Of The Attorney General	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	No
OFF_SL_08-1329_1	Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	Suite 1500 50 South Sixth Street Minneapolis, MN 554021498	Paper Service	No
OFF_SL_08-1329_1	Sharon	Ferguson	sharon.ferguson@state.mn.us	MN Department Of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	Yes