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March 13, 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. G011/M-08-1328

Dear Dr. Haar:

Attached to these *Supplemental Comments* are Attachments 1 and 2 that were inadvertently omitted from the Minnesota Office of Energy Security's (OES) March 4, 2009 *Comments* related to Minnesota Energy Resources Corporation's Northern Pipeline system annual demand entitlement filing (Docket No. G011/M-08-1328). The OES apologizes for any inconvenience this may have caused.

Sincerely,

/s/ ADAM J. HEINEN
Rates Analyst
(651)-296-6329

AJH/ja
Attachment

OES Attachment 1
Allocation and Direct Assignment
of MERC-PNG's Northern Demand Entitlements
As Proposed by MERC

As Proposed G011/M-08-1328	M-06-1535 MERC MN GS	M-07-1405 MERC MN GS	M-08-1328 MERC MN GS	Proposed Change
Design Day (excludes CD units)	200,484	202,263	225,397	1,779
Customer Requirements moving to Transportation 2005-6				
Adjusted Design Day	200,484	202,263	225,397	1,779
Total Entitlement Capacity (includes non-recallable capacity)	227,526	226,785	226,785	0
Less: Windom	2,500	2,500	2,500	0
Less: LS Power	29,100	26,323	26,323	0
Less: TF12B	42,170	43,858	29,906	(13,952)
Less: TF5	36,772	29,619	26,827	(2,792)
Less: TFX(5)	73,190	90,130	90,130	0
Less: Contract Demand Units	0	0	0	0
Total Design Day Capacity (excluding direct assignments)	195,926	197,962	197,962	0
<u>Allocated Entitlements in PGA</u>				
Windom	2,500	2,500	2,500	0
TF12B	42,170	43,858	29,906	(13,952)
TF12V	34,070	15,946	32,690	16,744
TF5	36,772	29,619	26,827	(2,792)
TFX12 (112486)	9,724	9,724	9,724	0
TFX(5) (112486)	73,190	56,554	56,554	0
TFX12 (111866)	0	8,685	8,685	0
TFX5 (111866)	0	33,576	33,576	0
LS Power	0	26,323	26,323	0
Total Allocated Entitlements in PGA	198,426	226,785	226,785	0
<u>Direct Assigned Entitlements in PGA</u>				
Windom	2,500	2,500	2,500	0
LS Power	29,100	26,323	26,323	0
TFX (October)	0	2,000	2,000	0
TFX (April)	0	2,000	2,000	0
TFX(7)	0	0	0	0
TFX(5)	0	0	0	0
Total Direct Assignments	31,600	32,823	32,823	0
Total Capacity before Peak Shaving 1/	230,026	259,608	259,608	0
LP Peak Shaving	0	0	0	0
Total Design Day Capacity w/o Contract Demand	227,526	259,608	259,608	0
Total Annual Transportation	88,464	80,713	83,505	2,792
Total Seasonal Transportation	139,062	146,072	143,280	(2,792)
Total Percent Seasonal	61.1%	56.3%	55.2%	-1.08%
LS Power as % of Total DD Capacity	12.8%	11.6%	11.6%	0.00%
Reserve Margin	13.49%	28.35%	15.18%	-13.17%
<u>Direct Assigned Demand Not in PGA</u>				
TF-12-B Contract Demand	0	0		0
Total Design Day Capacity w/ contract demand	227,526	259,608	259,608	0
<u>Other Entitlements not included in Peak Day Deliverability</u>				
TFX Oct	2,000	2,000	2,000	0
TFX Apr	0	2,000	2,000	0
TFX7 (111866)	0	10,837	10,837	0
FDD Storage reservation	69,094	73,022	76,476	3,454
FDD Storage capacity 2/	4,349,321	4,210,037	4,246,258	36,221
Tenaska PSO New	188,000	170,237	0	(170,237)
SMS	22,680	20,537	20,537	0

1/ Volumes include entitlements allocated to NMU

2/ Cycled Volumes = 845,629

OES Attachment 2
Demand Entitlement Analysis
MERC-PNG's Northern Customers
As Proposed by MERC

Heating Season	Number of Firm Customers			Design Day Requirement			Total Entitlement + Peak Shaving			Reserve Margin (10) % of Reserve Margin [(7)-(4)]/(4)
	(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	
2008-2009	156,973	1,063	0.68%	225,397	23,134	11.44%	226,785	0	0.00%	0.62%
2007-2008	155,910	6,861	4.60%	202,263	1,779	0.89%	226,785	(741)	-0.33%	12.12%
2006-2007	149,049	741	0.50%	200,484	463	0.23%	227,526	17,399	8.28%	13.49%
2005-2006	148,308	4,412	3.07%	200,021	(7,813)	-3.76%	210,127	(9,857)	-4.48%	5.05%
2004-2005	143,896	3,191	2.27%	207,834	9,313	4.69%	219,984	13,844	6.72%	5.85%
2003-2004	140,705	3,957	2.89%	198,521	3,042	1.56%	206,140	(5,537)	-2.62%	3.84%
2002-2003	136,748	4,156	3.13%	195,479	(1,007)	-0.51%	211,677	13,282	6.69%	8.29%
2001-2002	132,592	2,844	2.19%	196,486	1,522	0.78%	198,395	0	0.00%	0.97%
2000-2001	129,748	3,446	2.73%	194,964	5,146	2.71%	198,395	7,195	3.76%	1.76%
1999-2000	126,302	3,619	2.95%	189,818	5,336	2.89%	191,200	3,425	1.82%	0.73%
1998-1999	122,683	3,102	2.59%	184,482	4,634	2.58%	187,775	6,709	3.71%	1.78%
1997-1998	119,581	700	0.59%	179,848	10,952	6.48%	181,066	27,179	17.66%	0.68%
1996-1997	118,881	2,942	2.54%	168,896	19,064	12.72%	153,887	12,792	9.07%	-8.89%
1995-1996	115,939	2,061	1.81%	149,832	(12,357)	-7.62%	141,095	0	0.00%	-5.83%
1994-1995	113,878	3,886	3.53%	162,189	5,252	3.35%	141,095	0	0.00%	-13.01%
1993-1994	109,992	2,588	2.41%	156,937	3,693	2.41%	141,095	(3,685)	-2.55%	-10.09%
1992-1993	107,404	2,705	2.58%	153,244	3,859	2.58%	144,780	0	0.00%	-5.52%
1991-1992	104,699	731	0.70%	149,385	1,043	0.70%	144,780	907	0.63%	-3.08%
1990-1991	103,968			148,342			143,873			
Average:			2.32%			2.45%			2.69%	0.49%

OES Attachment 2
Demand Entitlement Analysis
MERC-PNG's Northern Customers
As Proposed by MERC

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)****	(19) Peak Day Sendout per DD Customer (12)/(1)
2008-2009	unknown	unknown			0.0088	1.4359	1.4447	unknown	unknown
2007-2008	156,973	182,809	21,626	13.42%	0.1573	1.2973	1.4546	1.1646	1.0068
2006-2007	155,910	161,183	(22,248)	-12.13%	0.1814	1.3451	1.5265	1.0338	1.0814
2005-2006	148,308	183,431	24,083	15.11%	0.0681	1.3487	1.4168	1.2368	1.2368
2004-2005	148,242	159,348	(7,019)	-4.22%	0.0844	1.4443	1.5288	1.0749	1.1074
2003-2004	143,830	166,367	7,044	4.42%	0.0541	1.4109	1.4651	1.1567	1.1824
2002-2003	140,705	159,323	17,247	12.14%	0.1185	1.4295	1.5479	1.1323	1.1651
2001-2002	137,259	142,076	(22,028)	-13.42%	0.0144	1.4819	1.4963	1.0351	1.0715
2000-2001	132,247	164,104	21,769	15.29%	0.0264	1.5026	1.5291	1.2409	1.2648
1999-2000	131,538	142,335	(13,628)	-8.74%	0.0109	1.5029	1.5138	1.0821	1.1269
1998-1999	127,014	155,963	7,292	4.90%	0.0268	1.5037	1.5306	1.2279	1.2713
1997-1998 *	122,683	148,671	(13,962)	-8.58%	0.0102	1.5040	1.5142	1.2118	1.2433
1996-1997	119,581	162,633	(13,299)	-7.56%	-0.1263	1.4207	1.2945	1.3600	1.3680
1995-1996 **	118,881	175,932	39,122	28.60%	-0.0754	1.2923	1.2170	1.4799	1.5175
1994-1995	116,296	136,810	(27,074)	-16.52%	-0.1852	1.4242	1.2390	1.1764	1.2014
1993-1994	unknown	163,884	35,896	28.05%	-0.1440	1.4268	1.2828	1.4900	1.4900
1992-1993	unknown	127,988	7,396	6.13%	-0.0788	1.4268	1.3480	1.1917	1.1917
1991-1992	unknown	120,592	(12,451)	-9.36%	-0.0440	1.4268	1.3828	1.1518	1.1518
1990-1991	unknown	133,043			-0.0430		1.3838	1.2797	1.2797
Average:			2.80%		0.0034	1.4313	1.4388	1.2070	1.2199

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Attachment 2
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* The Firm Peak Day Sendout and all related amounts in columns 13, 14, and 18 for all years prior to 1997-98 have been corrected.

** The calculated historic average of "Design-Day per Customer" excludes the 1995-96 design-day per customer projection of 1.2923 Mcf/day which, as discussed in Docket No. G011/M-95-1145, was incorrectly calculated.

*** The total entitlement for 2002-2003 includes the 7,410 Mcf/day of entitlement permanently released to Cornerstone.

**** The number of design day customers are used when the number of firm peak day customers is unknown.

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. **G011/M-08-1328**

Dated this **13th** day of **March, 2009**.

/s/Sharon Ferguson

G011/M-08-1328

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