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January 3, 2010

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 Office of Energy Security**
Docket Nos. G011/M-10-1168, G011/M-10-407, G007/M-10-409

Dear Dr. Haar:

Attached are the comments of the Minnesota Office of Energy Security (OES) in the following matter:

> A request by Minnesota Energy Resources Corporation--PNG (MERC, MERC-PNG or Company) for approval by the Minnesota Public Utilities Commission (Commission) of a change in demand units for its Northern Natural Gas (Northern) Purchased Gas Adjustment (PGA) Transmission System effective November 1, 2010.

The filing was submitted on November 1, 2010. The petitioner is:

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

The OES cannot recommend approval of MERC's petition at this time. At a minimum, the OES recommends that the Commission disallow MERC's implementation of charging customers for 12,525 Dkt/day of demand costs, amounting to a disallowance of approximately $896,367.

In addition, due to the related issue of the bill impacts on MERC's customers raised in MERC's petition for approval of its 2009 Conservation Improvement Program (CIP) Tracker Account, demand-side management (DSM) financial incentive and CIP Adjustment Factor, the OES files these comments in the companion dockets noted above and recommends that the effects of MERC's proposal in the instant docket be explored further in the investigation recommended in the CIP dockets.

The OES recommends that MERC-PNG provide the following information in its *Reply Comments*:

- daily New York Mercantile Exchange (NYMEX) closing prices at the Henry Hub and basis spreads for the Rockies (using the CIG Rocky Mountain price or some other applicable Rocky Mountain regional hub), Ventura Hub, and Demarcation for each forward contract over the period from January 1, 2008 to August 21, 2008;
- daily volatility measures for the points detailed in the previous bullet point for each forward contract over the period from January 1, 2008 to August 21, 2008;
- a full explanation detailing whether MERC investigated procuring other sources of gas to diversify its supply portfolio;
- a detailed analysis of contract prices available for alternate demand contracts over the period from January 1, 2008 to August 21, 2008;
- a full list and explanation, including demand and commodity prices and price differences from the Bison contract, of all alternate contracts that MERC considered as alternatives to the Bison contract;
- a full explanation detailing whether MERC's design-day analysis produces reasonable estimates; and
- a full explanation detailing the reasonableness of MERC's reserve margin and procured entitlement level.

The OES will provide its recommendations after reviewing this information and is available to answer any questions that the Commission may have.

Sincerely,

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

AJH/jl
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA OFFICE OF ENERGY SECURITY

DOCKET NOS. G011/M-10-1168, G011/M-10-407
AND G007/M-10-409

I. SUMMARY OF COMPANY'S PROPOSAL AND OVERVIEW OF OES'S ANALYSIS

Pursuant to Minnesota Rules 7825.2910, subpart 2, Minnesota Energy Resources Corporation--PNG (MERC, MERC-PNG, or Company) filed a change in demand entitlement petition (*Petition)* on November 1, 2010. In its *Petition*, MERC requests that the Minnesota Public Utilities Commission (Commission) accept the following changes in the Company's overall level of contracted capacity.

The Company's Proposed Total Entitlement Changes	
Type of Entitlement	**Proposed Changes: Increase (Decrease) (Dkt)[1]**
TF-12 Base and Variable	7,361
TF5	(834)
TFX-12	(2,397)
TFX-5	(1,143)
LS Power Peaking	(424)

The Company's proposal would increase the Company's proposed design-day (winter) capacity by 2,563 Dkt.

The Minnesota Office of Energy Security (OES) discusses the various effects on the Company's rates for different customer classes below; however, the OES notes that MERC's proposal would have a significant effect on MERC's firm-service customers. For example, MERC-PNG's proposal would increase demand rates for residential heating customers by $0.6264 per Mcf or approximately $62.64 per year for residential customers using 100 Mcf. According to the Company, this amount represents a 60.45 percent increase in demand costs over those charged in

[1] Dekatherms (Dkt).

the October 2010 Purchased Gas Adjustment (PGA) filing.[2] Similarly, Small Volume Firm and Large Volume Firm customers would face significant increases in the amounts they pay for contracted demand.

Since this proposal causes a significant increase in costs and associated bill impacts that, as discussed below, MERC has not shown to be reasonable, and since bill impacts is the main issue raised in MERC's companion CIP dockets (Docket Nos. G011/M-10-407 and G007/M-10-409), the OES files these comments in the CIP dockets to allow for a more thorough review of these related issues.

MERC requests that the Commission allow recovery of the associated demand costs in its monthly MERC-PNG PGA effective November 1, 2010. However, the OES cannot recommend recovery of all of these costs at this time. As discussed further below, the Commission may wish to disallow, at a minimum, MERC's implementation of 12,525 Dkt/day or approximately $896,367 in costs.

The Company describes the factors contributing to the need for changing demand entitlements as follows:[3]

- an allocation of 7,000 Dkt of TF-12 capacity that had historically been allocated to MERC-NMU and MERC-PNG Viking being allocated, instead, to MERC-NMU and MERC-PNG Northern and because: 1) this capacity had rarely been used on the Viking system and 2) this reallocation would better align costs with the customers who benefit from the contract; and

- a change in the allocation process used to apportion capacity associated with the LS Power contract. This capacity is now allocated based upon the forecasted design day as presented in the Company's Attachment 5.

The OES appreciates the explanations provided by MERC in its *Petition*; however, the OES has some concerns associated with the 7,000 Dkt of capacity as it relates to the Company's reserve margin. The OES's concerns regarding the reserve margin are discussed in greater detail in Section II (D) below.

The Company also proposed changes to non-capacity items in the November 2010 PGA compared to the October 2010 PGA as follows:

- contracted for 44,589 Dkt/day of capacity on the Bison Pipeline (Bison) which then delivers these volumes into Northern Border Pipeline (NBPL). This arrangement allows MERC to access gas supplies in the Rocky Mountain region;[4]

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[2] MERC *Petition*, Attachment 11, Page 1 of 2.
[3] *Petition*, pages 2 and 3.
[4] This agreement, and the specifics associated with the Bison Project are discussed in greater detail in Docket No. G007,011/M-08-698.

- decreased the amount of volumes associated with its TFX April and TFX October contracts; and

- increased the amount of volumes associated with its Firm Deferred Delivery (FDD) (storage) contracts.

The OES has two concerns associated with the changes listed above. First, the OES has serious concerns associated with the Company's Bison and NBPL contracts. These concerns are discussed in Section II (B) below.

Second, in terms of MERC's FDD contracts, the OES notes that MERC includes these costs solely in the demand portion of the PGA. It has been the OES's position since the Company's 2008-2009 demand entitlement filing (Docket No. G011/M-08-1328) that these costs should be included in the commodity portion of the PGA, which is charged to firm and interruptible customers, rather than the demand portion, which is charged only to firm customers, since all ratepayers benefit from storage gas. MERC includes attachments calculating costs when these FDD contracts are booked in the commodity portion of the PGA.[5] Since this issue has been thoroughly discussed in the previous two demand entitlement filings, the OES does not provide additional discussion here and maintains its recommendations in the previous demand entitlement filings regarding FDD storage costs.[6]

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

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

- the proposed overall demand entitlement level;
- MERC's Bison Contract;
- the design-day requirement;
- the reserve margin; and
- the PGA cost recovery proposal.

A. PROPOSED OVERALL DEMAND ENTITLEMENT LEVEL

As indicated in OES Attachment 1, the Company requests approval to increase its total entitlement level in Dkt as follows:

Previous Entitlement (Dkt)	Proposed Entitlement (Dkt)	Entitlement Changes (Dkt)	% Change From Previous Year
231,064	233,627	2,563	1.11

[5] *Petition*, Attachment 4, pages 4 through 6 and Attachment 11, page 2 of 2.
[6] Docket Nos. G011/M-08-1328 and G011/M-09-1283.

The OES analyzes below the proposed changes, the proposed design-day requirement, and the proposed reserve margin. Based on the information available at this time, the OES concludes that MERC-PNG has not shown its proposed recovery of demand costs to be reasonable. As discussed further below, the OES has concerns associated with MERC's reserve margin and whether the procured amount of capacity is reasonable.

B. BISON CONTRACT

In its *Petition*, MERC proposes to begin recovering costs associated with its Bison Contract. The Bison Contract allows the Company (through an interconnection with NBPL) to source natural gas supplies from the Rocky Mountain region (specifically in the Powder River Basin of Wyoming) and then deliver these volumes to the Ventura, IA Hub for eventual delivery to MERC's Minnesota customers. The Company's plan to access Rocky Mountain gas was first brought to the attention of the OES and Commission when MERC made a filing on June 11, 2008 in Docket No. G007,011/M-08-698. In that docket, MERC provided a detailed explanation of the Bison Pipeline Project and further discussed that the Company had the opportunity to secure gas supplies, through an open season, on the Bison Pipeline. The Company explained that dynamics in the natural gas market were changing and that it was necessary to diversify MERC's supply portfolio.

At the time of the June 11, 2008 filing, MERC contracted for approximately 62 percent of its Northern winter capacity from Canadian sources and, under the Bison Contract, MERC would be able to bring this percentage down to approximately 40 percent, which would reduce the Company's reliance upon Canadian gas. The Company saw this scenario as attractive since Rocky Mountain gas was historically cheaper than other gas supplies. Further, natural gas markets in Canada were being affected by proposed royalties legislation in the Canadian province of Alberta (where the majority of Canadian gas is sourced), an appreciating Canadian Dollar, and decreasing supply levels.

The issue of pre-approving MERC's open season went before the Commission on August 21, 2008; ultimately, the Commission did not take action on the Company's proposal, since the Commission does not generally pre-approve utilities' cost recovery for pipeline contracts. In its August 1, 2008 *Comments*, the OES expressed support for MERC's plan since the information MERC provided at that time indicated that total delivered costs would have been under $10 per Mcf. Specifically, MERC provided Exhibit 6 showing estimated "Total Bison Costs" with delivered costs on a yearly basis, through 2018, of approximately $9.00 per Dkt, including total transportation fees of just under $1.00 per Dkt. For ease of reference, the OES attaches MERC's Exhibit 6 to these comments as OES Attachment 2.

However, MERC now indicates that the Company expected costs in 2008 to be roughly what MERC now proposes to recover in its monthly PGA, which is nearly $25 per Dkt. That is, despite how Exhibit 6 portrays the information about the cost of the Bison project, MERC states that the information referred to daily transportation fees, rather than the monthly per-Dkt costs typically used for demand costs in PGAs. Therefore, when the OES observed that transportation fees were just under $1.00 per Dkt, the OES assumed that this amount would be comparable to how demand costs are presented in the monthly PGA.

If the OES had been aware that total demand fees, including NBPL costs, would have been nearly $25 per Dkt, which is approximately $10 a Dkt greater than Northern's most expensive seasonal reservation fee, the OES would not have supported MERC's decision unless MERC was able to show that this cost was likely to be less expensive than other alternatives, including alternatives from Northern. While the OES agrees that supply diversification is an important goal, this goal should not be pursued at any costs since ratepayers bear the costs of these contracts.

To show the overall effects of MERC's proposed changes, the OES provides the table below, comparing the costs MERC filed in its October and November 2010 PGAs:

Company/Category	October, 2010 $/Therm	November, 2010 $/Therm	Difference $/Therm
Viking			
Demand	**$0.09994**	**$0.08815**	**($0.0118)**
Commodity	$0.37865	$0.37283	($0.0058)
Total	$0.47859	$0.46098	($0.0176)
NNG			
Demand	**$0.10362**	**$0.16626**	**$0.0626**
Commodity	$0.39286	$0.40598	$0.0131
Total	$0.49648	$0.57224	$0.0758
NMU			
Demand	**$0.10218**	**$0.12669**	**$0.0245**
Commodity	$0.38331	$0.38341	$0.0001
Total	0.48549	$0.51010	$0.0246
Great Lakes			
Demand	**$0.0761**	**$0.0842**	**$0.0081**
Commodity	$0.3775	$0.3685	($0.0090)
Total	$0.4536	$0.4527	($0.0010)

The costs for Viking decrease since MERC proposes to reallocate demand costs away from these customers. The OES notes that the appropriateness of the re-allocation of these demand costs, in terms of firm reliability, are discussed in greater detail in the OES's Viking PGA system demand entitlement filing in Docket No. G011/M-10-1169. In terms of this re-allocation's impact on Northern system demand costs, the OES includes these costs in the disallowance calculation in Section II (D) below.

Further, as indicated in the table above, under MERC's proposal, the current demand costs for MERC-PNG's Northern system being charged to customers are significantly higher than other demand costs charged by MERC in its monthly PGA. However, the possibility exists that commodity costs secured in the Rocky Mountains may be lower than in Canada or the Mid-Continent (*e.g.,* Kansas, Texas), which means that total ratepayer costs may be comparable. While the information above does not suggest such a trade-off, current costs do not show whether MERC's decision to enter into the Bison Contract was reasonable or prudent. Rather, it is necessary to examine the information available to the Company when it made this decision during the spring of 2008.

General economic conditions and natural gas market dynamics are markedly different today than they were in early 2008. At the time of MERC's filing, natural gas prices were significantly higher than current commodity prices; further, commodity gas prices were steadily rising in the early part of 2008, bringing volatility into the market. In addition, as noted by the Company in its filing, and in Staff's August 14, 2008 *Briefing Papers*, the basis point spread between Ventura and the Rockies was quite large, thus making Rockies sourced gas more attractive at that time.

However, subsequent to MERC's Bison filing, general economic conditions and natural gas market dynamics changed dramatically. In terms of the natural gas market, commodity gas prices have decreased significantly, the supply decreases in Canada have abated, and the basis spreads between Rockies gas and Ventura have become much smaller. Nonetheless, at this time, the information in this demand entitlement filing and the information provided by MERC in the Bison docket do not make it clear whether the costs associated with the Bison contract were prudent at the time they were entered into. The information above suggests that the costs are not reasonable. Given the above discussion, the OES recommends that MERC provide the following in its *Reply Comments*:

- daily New York Mercantile Exchange (NYMEX) closing prices at the Henry Hub and basis spreads for the Rockies (using the CIG Rocky Mountain price or some other applicable Rocky Mountain regional hub), Ventura Hub, and Demarcation for each forward contract over the period from January 1, 2008 to August 21, 2008;
- daily volatility measures for the points detailed in the previous bullet point for each forward contract over the period from January 1, 2008 to August 21, 2008;
- a full explanation detailing whether MERC investigated procuring other sources of gas to diversify its supply portfolio;
- a detailed analysis of contract prices available for alternate demand contracts in 2008; and
- a full list and explanation, including demand and commodity prices and price differences from the Bison contract, of all alternate contracts that MERC considered as alternatives to the Bison contract.

C. DESIGN-DAY REQUIREMENT

The Company used the same basic design-day study as in its previous demand entitlement filing.[7] The OES analyzed this proposal based on peak-day levels from previous periods along

[7] See Docket No. G011/M-09-1284.

with changes since that time. The OES concludes that MERC's design-day study and accompanying entitlements appear to ensure sufficient capacity to serve firm demand on a peak day.

However, as discussed in Sub-section D below, MERC's reserve margin is quite high, suggesting that the demand costs are too high. An abnormally high reserve margin raises the possibility that the Company's design-day methodology does not produce reasonable estimates. Given this concern, the OES withholds any recommendation regarding MERC's design-day analysis until the Company provides a full explanation in its *Reply Comments* detailing whether its design-day approach produces reasonable estimates.

D. RESERVE MARGIN

As indicated in OES Attachment 1, the reserve margin is as follows:

Total Entitlement (Dkt)	Design-day Estimate (Dkt)	Difference (Dkt)	Reserve Margin %	% Change From Previous Year
233,627	194,598	39,029	20.06	6.44

MERC-PNG's reserve margin of more than 20 percent is much higher than the 5 percent level the OES generally considers to be reasonable. MERC has not shown why it is reasonable for the reserve margin to be so much higher than 5 percent, nor why it is reasonable to increase the Company's reserve margin significantly from previous levels; as shown on OES Attachment 1, the Company's average reserve margin since 1991-1992 has been 2.12 percent. The main concern associated with a utility carrying an excessive reserve margin is that it subjects ratepayers to paying rates that are unreasonably high.

To bring MERC's Northern PGA system reserve margin to the five percent threshold, the total entitlement level would need to be decreased by 29,299 Dkt/day to a total of 204,328 Dkt/day. However, the OES notes that in its June 7, 2010 *Response Comments* in Docket No. G011/M-09-1284, the OES stated that a 13.62 percent reserve margin was acceptable for MERC's Northern PGA system based on cost savings associated with the LS Power contract over more expensive Northern entitlements. Using the 13.62 percent reserve margin, for MERC to bring its entitlements levels within this reserve margin, it would need to decrease its total entitlements by 12,525 Dkt/day to a total amount of 221,102 Dkt/day.

Unless MERC can support charging its customers for costs higher than this amount, the OES recommends that the Commission not allow MERC to recover the costs of these demand volumes, resulting in a disallowance of approximately $896,367 (OES Attachment 3). The OES arrives at this figure based on each individual contract's percentage amount of MERC's total entitlement level.[8] For example, if a TFX-5 contract was 5 percent of the total entitlement level,

[8] The OES notes that, in terms of calculating the percentage, it only considers contracts that are used to serve need on a peak day. Therefore, the Bison contract, shoulder month specific, and other non-heating season specific contracts are not included in this calculation.

then approximately 626 Dkt/day of the 12,525 Dkt/day difference is allocated to this contract. The OES recommends that MERC fully explain, in its *Reply Comments*, the reasonableness of its proposed reserve margin and procured entitlement level.

E. THE COMPANY'S PGA COST RECOVERY PROPOSAL

The demand entitlement amounts listed in MERC's Attachment 5 represent the demand entitlements for which the Company's firm customers would pay under MERC's proposal. In its *Petition*, the Company compares its October 2010 PGA to its November 2010 PGA (the Company's Attachment 11, page 1 of 2). The Company's demand entitlement proposal would result in the following annual rate impacts:[9]

- annual bill increase of $78.22, or approximately 60.45 percent, for the average General Service customer consuming 125 Dkt annually;

- annual bill increase of $34.93, or approximately 14.93 percent, for the average Small Volume Firm customer consuming 25 Dkt annually of contracted demand; and

- annual bill increase of $104.80, or approximately 14.93 percent, for the average Large Volume Firm customer consuming 75 Dkt annually of contracted demand.

Given the issues associated MERC's Bison Contract and reserve margin, the OES cannot recommend approval of MERC's proposal. The OES will review MERC's response to the OES's concerns and provide subsequent recommendations.

III. THE OES'S RECOMMENDATIONS

The OES cannot recommend approval of MERC's demand entitlement filing. At a minimum, the OES recommends that the Commission disallow MERC to charge customers for 12,525 Dkt/day of demand costs, amounting to a disallowance of approximately $896,367. The OES also recommends that MERC provide the following in its *Reply Comments*:

- daily New York Mercantile Exchange (NYMEX) closing prices at the Henry Hub and basis spreads for the Rockies (using the CIG Rocky Mountain price or some other applicable Rocky Mountain regional hub), Ventura Hub, and Demarcation for each forward contract over the period from January 1, 2008 to August 21, 2008;
- daily volatility measures for the points detailed in the previous bullet point for each forward contract over the period from January 1, 2008 to August 21, 2008;
- a full explanation detailing whether MERC investigated procuring other sources of gas to diversify its supply portfolio;

[9] These annual bill impacts are based on the Company's allocation of FDD Storage contracts to the demand portion of the PGA and not the commodity portion of the PGA as advocated by the OES.

- a detailed analysis of contract prices available for alternate demand contracts over the period from January 1, 2008 to August 21, 2008;
- a full list and explanation, including demand and commodity prices and price differences from the Bison contract, of all alternate contracts that MERC considered as alternatives to the Bison contract;
- a full explanation detailing whether MERC's design-day analysis produces reasonable estimates; and
- a full explanation detailing the reasonableness of MERC's reserve margin and procured entitlement level.

/jl

OES Attachment 1
Demand Entitlement Analysis
MERC-PNG's Northern Customers
As Proposed by MERC-PNG

	Number of Firm Customers			**Design Day Requirement**			**Total Entitlement + Peak Shaving**			**Reserve Margin**
Heating Season	(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)
2010-2011	158,298	628	0.40%	194,598	(8,762)	-4.31%	233,627	2,563	1.11%	20.06%
2009-2010	157,670	697	0.44%	203,360	(22,037)	-9.78%	231,064	4,279	1.89%	13.62%
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:			2.13%			1.50%			2.57%	2.12%

OES Attachment 1
Demand Entitlement Analysis
MERC-PNG's Northern Customers
As Proposed by MERC-PNG

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)
2010-2011	unknown	unknown			0.2466	1.2293	1.4759	unknown	unknown
2009-2010	158,298	151,937	(24,288)	-13.78%	0.1757	1.2898	1.4655	0.9598	1.0040
2008-2009	157,951	176,225	(6,584)	-3.60%	0.0088	1.4359	1.4447	1.1157	1.0062
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:				1.59%	0.0232	1.4132	1.4420	1.1901	1.1984

* 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.

Exhibit 6

Year	Total Annual Contracted Volumes	Total Projected Bison Delivered Cost	Total Projected Bison Delivered Unit Cost	Total Projected POM Delivered Cost	Total Projected POM Delivered Unit Cost	Total Projected Ventura Delivered Cost	Total Projected Ventura Delivered Unit Cost
2010	3,050,000	$ 27,999,458	$ 9.1802	$ 31,328,321	$ 10.2716	$ 31,450,675	$ 10.3117
2011	18,250,000	$ 166,966,790	$ 9.1489	$ 181,354,388	$ 9.9372	$ 178,669,125	$ 9.7901
2012	18,300,000	$ 163,998,700	$ 8.9617	$ 180,034,546	$ 9.8380	$ 175,999,300	$ 9.6174
2013	18,250,000	$ 161,691,159	$ 8.8598	$ 178,700,593	$ 9.7918	$ 174,229,125	$ 9.5468
2014	18,250,000	$ 161,300,694	$ 8.8384	$ 178,307,648	$ 9.7703	$ 173,847,625	$ 9.5259
2015	18,250,000	$ 162,495,374	$ 8.9039	$ 179,509,916	$ 9.8362	$ 175,014,875	$ 9.5899
2016	18,300,000	$ 164,575,698	$ 8.9932	$ 181,665,808	$ 9.9271	$ 177,116,800	$ 9.6785
2017	18,250,000	$ 166,217,332	$ 9.1078	$ 183,255,511	$ 10.0414	$ 178,651,375	$ 9.7891
2018	18,250,000	$ 168,895,320	$ 9.2545	$ 185,950,506	$ 10.1891	$ 181,267,875	$ 9.9325
Total	149,150,000	$ 1,344,140,526	$ 9.0120	$ 1,480,107,236	$ 9.9236	$ 1,446,246,775	$ 9.6966

Gas Cost Savings compared to Ventura $ (0.6846)

OES Disallowance Calculation							
Total Proposed Volume Amount	Total Proposed Deliverability	Percentage of Total Deliverability [(A)/(B)]	Volumes above 5 Percent Reserve Margin	(Column C) *(Column D)	Months	Contract Cost	Total Cost [(E)*(F)*(G)]
A	B	C	D	E	F	G	H
29675.00	233627.00	12.70%	12,525	1,591	12.00	$7.5776	$144,663.29
32290.00	233627.00	13.82%	12,525	1,731	12.00	$9.0926	$188,882.66
28785.00	233627.00	12.32%	12,525	1,543	5.00	$15.1530	$116,920.20
5200.00	233627.00	2.23%	12,525	279	12.00	$6.4818	$21,683.78
5351.00	233627.00	2.29%	12,525	287	5.00	$4.5600	$6,540.70
9651.00	233627.00	4.13%	12,525	517	12.00	$9.6288	$59,783.38
51163.00	233627.00	21.90%	12,525	2,743	5.00	$15.1530	$207,816.17
1605.00	233627.00	0.69%	12,525	86	5.00	$7.6050	$3,271.89
1144.00	233627.00	0.49%	12,525	61	12.00	$4.8640	$3,579.77
7376.00	233627.00	3.16%	12,525	395	12.00	$5.4720	$25,965.87
10631.00	233627.00	4.55%	12,525	570	12.00	$2.2192	$15,177.72
338.00	233627.00	0.14%	12,525	18	5.00	$4.8640	$440.69
2180.00	233627.00	0.93%	12,525	117	5.00	$5.4720	$3,197.62
19788.00	233627.00	8.47%	12,525	1,061	5.00	$15.1392	$80,302.59
25951.00	233627.00	11.11%	12,525	1,391	3.00	$4.3463	$18,140.52
2500.00	233627.00	1.07%	12,525	134	12.00	$0.0000	$0.00
233,628		100.00%					**$896,366.86**

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 Office of Energy Security
Comments

Docket No. G011/M-10-1168, G011/M-10-407 and G007/M-10-409

Dated this **3rd o**f **January**, **2011**

/s/Sharon Ferguson

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
John	Hulse		Swift & Company	1770 Promontory Circle Greeley, CO 806349038	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
Jack	Kegel		MMUA	Suite 400 3025 Harbor Lane North Plymouth, MN 554475142	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
Douglas D.	Kranich	N/A	Norbord Minnesota O.S.B.	4409 Northwood Rd NW Solway, MN 56678	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
David	Kyto	djkyto@integrysgroup.com	Integrys Business Support	700 North Adams P.O. Box 19001 Green Bay, WI 543079001	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
James D.	Larson		Avant Energy Services	200 S 6th St Ste 300 Minneapolis, MN 55402	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
Matthew	Leach	N/A	Otter Tail Energy Services Company	215 South Cascade Street Fergus Falls, MN 56538-0496	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
Robert S	Lee	RSL@MCMLAW.COM	Mackall Crounse & Moore Law Offices	1400 AT&T Tower 901 Marquette Ave Minneapolis, MN 554022859	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
John	Lindell	agorud.ecf@state.mn.us	Office of the Attorney General-RUD	900 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No	SPL_SL_10-409_Potentially Interested Parties

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Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	No	SPL_SL_10-409_Potentially Interested Parties
Michael	Loeffler		Northern Natural Gas Co.	CORP HQ, 714 1111 So. 103rd Street Omaha, NE 681241000	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
William M.	Mahlum	wmahlum@mahlumlaw.com	Mahlum & Associates	937 Summit Avenue St. Paul, MN 551053032	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
Thomas R.	Maus		Energy Associates, Inc.	254 Highway 33 North Cloquet, MN 557209403	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
Mike	McClone	N/A	Heat Share - Salvation Army	1031 Payne Avenue St. Paul, MN 55101-3840	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
Brian	Meloy	brian.meloy@leonard.com	Leonard, Street & Deinard	150 S 5th St Ste 2300 Minneapolis, MN 55402	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
Martin	Moody	mmoody@mn-mesb.org	Metro Emergency Services Board	2099 University Ave W Ste 201 St Paul, MN 55104-3431	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
Andrew	Moratzka	apm@mcmlaw.com	Mackall, Crounse and Moore	1400 AT&T Tower 901 Marquette Ave Minneapolis, MN 55402	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
Rick	Mummert	N/A	POET Biorefining Glenville	15300 - 780th Ave. Albert Lea, MN 56007	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties

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Diane E.	Nordstrom		Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
Edward	O'Connell	N/A	Otter Tail Energy Services Company	224 E. Washington Fergus Falls, MN 56583	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
Jeff	Sande		Bemidji State University	Box 1 Deputy Hall 1500 Birchmont Drive Bemidji, MN 566012699	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
Dan	Schroeder	N/A	US Energy Services, Inc.	1000 Superior Blvd., Suite 201 Wayzata, MN 55391	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
Ann	Seha	seha.ann@dorsey.com	Dorsey & Whitney	Suite 1500 50 South Sixth Street Minneapolis, MN 554021498	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
Bride	Seifert	bseifert@mnchamber.com	MN Chamber of Commerce	400 Robert St. N. #1500 St. Paul, MN 55101-2098	Electronic Service	No	SPL_SL_10-409_Potentially Interested Parties
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	Ste 122 9100 W Bloomington Frwy Bloomington, MN 55431	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
David	Shawn		Virgina Power Energy Marketing, Inc.	Dominion Energy Clearinghouse 5000 Dominion Boulevard Glen Allen, VA 23060	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
Andrew J.	Shea		McGrann Shea Anderson Carnival	Straughn & Lamb, Chartered 800 Nicollet Mall, Suite 2600 Minneapolis, MN 554027035	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties

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Sarah	Sorenson	kerbeshian.sarah@dorsey.com	Dorsey Whitney	50 South Sixth Street, Suite 1500 Minneapolis, MN 554021498	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
Byron E.	Starns	byron.starns@leonard.com	Leonard Street and Deinard	150 South 5th Street Suite 2300 Minneapolis, MN 55402	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
Mark	Straub		Cornerstone Energy	Suite 200 12120 Port Grace Blvd. La Vista, NE 68128	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	SPL_SL_10-409_Potentially Interested Parties
James R.	Talcott		Northern Natural Gas Company	1111 South 103rd Street Omaha, NE 68124	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
Laurance R.	Waldoch		Lindquist & Vennum	4200 IDS Center 80 South 8th Street Minneapolis, MN 554022274	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
Gregory	Walters	gjwalters@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	3460 Technology Dr. NW Rochester, MN 55901	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
Keith	Weigel		AARP	Suite 1200 30 E. Seventh Street St. Paul, MN 55101	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
Casey	Whelan		U.S. Energy Services, Inc.	Suite 1200 605 Highway 169 North Minneapolis, MN 554416531	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties
James P.	Zakoura		Smithyman & Zakoura Chartered	750 Commerce Plaza II 7400 West 110th Street Overland Park, KS 662102362	Paper Service	No	SPL_SL_10-409_Potentially Interested Parties