

October 10, 2013

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 Department of Commerce, Division of Energy Resources**  
Docket No. G011/GR-13-617

Dear Dr. Haar:

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

In the Matter of the Application of Minnesota Energy Resources Corporation for Authority to Increase Rates for Natural Gas Service in Minnesota.

The Petition was filed on September 30, 2013 by:

Barbara A. Nick  
President  
Minnesota Energy Resources Corporation  
2665 145<sup>th</sup> Street West  
Box 455  
Rosemount, MN 55068

The Department recommends that the Commission:

- accept Minnesota Energy Resources Corporation's petition as substantially complete; and
- refer this matter to the Office of Administrative Hearings for a contested case proceeding.

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

Sincerely,

/s/ MICHELLE ST. PIERRE  
Financial Analyst

MS/ja  
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE  
MINNESOTA DEPARTMENT OF COMMERCE  
DIVISION OF ENERGY RESOURCES

DOCKET No. G011/GR-13-617

**I. OVERVIEW**

On October 2, 2013, the Minnesota Public Utilities Commission (Commission) issued a *Notice of Comment Period on Completeness and Procedures* (Notice) in the general rate case petition (Petition) filed on September 30, 2013 by Minnesota Energy Resources Corporation (MERC or the Company). Topics open for comment are whether MERC's application complies with the filing requirements of Minnesota Statutes §216B.16, Minnesota Rules parts 7825.3100 to 7825.4400, and relevant Commission Orders. The Notice also indicates that comments are appropriate on whether this matter should be sent to the Office of Administrative Hearings for a contested case hearing and if so, the scope of the hearing. The Minnesota Department of Commerce, Division of Energy Resources (Department or DOC) submits the following Comments, pursuant to the Commission's October 2, 2013 Notice.

**II. DEPARTMENT ANALYSIS**

The Department conducted a review of the contents of MERC's Petition to verify the Company's compliance with:

- statutory requirements (Minnesota Statutes §216B.16);
- Commission's rules governing filing requirements for rate changes (Minnesota Rules parts 7825.3100 to 7825.4400);
- Commission's general rate case Policy Statements dated June 14, 1982;
- Commission Orders pursuant to MERC's most recent general rate cases (Docket Nos. G007,011/GR-08-835 and G007,011/GR-10-977); and

- Commission Orders in various dockets that may affect this rate proceeding.

Similar to MERC's last general rate case, in Volume 1 of the Petition, MERC prepared a *Filing Requirement Compliance Table* that lists rate case filing requirements that apply to the Company. The table describes the filing requirement and generally identifies the location in the Petition where each compliance item is addressed. At the end of this table, MERC has also included for reference a list of Order requirements that no longer apply with an explanation of how the requirements were addressed. The Department notes that the Company chose calendar year 2012 for the most recent fiscal year, calendar year 2013 for the projected year, and calendar year 2014 for the proposed test year.

Based on its review, the Department concludes that MERC's filing substantially fulfills the filing requirements. The Department emphasizes that its review at this stage of the proceeding relates to whether the Company's Petition provided at least some information on the issues, rather than the merits of the information provided in the Petition. As such, issues can be and will be further developed in information requests. Accordingly, the Department recommends that the Commission accept the Petition and refer this matter to the Office of Administrative Hearings for a contested case proceeding. The scope of the contested case proceedings should include the following issues, as well as other issues raised by parties relevant to the Company's proposed rate increase:

- 1) Is MERC's proposed test-year revenue increase reasonable?
- 2) Has MERC appropriately ensured that costs proposed to be paid by ratepayers pertain only to regulated utility costs?
- 3) Are MERC's proposed capital structure, cost of capital, and return on equity reasonable?
- 4) Is MERC's proposed rate design reasonable?

### **III. DEPARTMENT RECOMMENDATIONS**

The Department recommends that the Commission:

- accept MERC's Petition as complete; and
- refer this matter to the Office of Administrative Hearings for a contested case proceeding.

/ja

## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce  
Comments**

**Docket No. G011/GR-13-617**

Dated this 10<sup>th</sup> day of **October, 2013**

**/s/Sharon Ferguson**

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Robert	Lee	N/A	Mackall, Crouse & Moore, PLC	1400 AT&T Tower 901 Marquette Avenue Minneapolis, MN 55402	Paper Service	No	SPL_SL_13- 617_Interested Parties
Martin	Lepak	N/A	Arrowhead Economic Opportunity	702 S 3rd Ave  Virginia, MN 55792	Paper Service	No	SPL_SL_13- 617_Interested Parties



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Allan	Lian	alian@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	SPL_SL_13- 617_Interested Parties
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No	SPL_SL_13- 617_Interested Parties
Michael	Loeffler	mike.loeffler@nngco.com	Northern Natural Gas Co.	CORP HQ, 714 1111 So. 103rd Street Omaha, NE 681241000	Electronic Service	No	SPL_SL_13- 617_Interested Parties
William M.	Mahlum	wmahlum@mahlumlaw.com	Mahlum & Associates	937 Summit Avenue  St. Paul, MN 551053032	Electronic Service	No	SPL_SL_13- 617_Interested Parties
Nick	Mark	nick.mark@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave  Minneapolis, MN 55402	Electronic Service	No	SPL_SL_13- 617_Interested Parties
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Paper Service	No	SPL_SL_13- 617_Interested Parties
Samuel	Mason	smason@beltramelectric.com	Beltrami Electric Cooperative, Inc.	4111 Technology Dr. NW PO Box 488 Bemidji, MN 56619-0488	Electronic Service	No	SPL_SL_13- 617_Interested Parties
Thomas R.	Maus		Energy Associates, Inc.	254 Highway 33 North  Cloquet, MN 557209403	Paper Service	No	SPL_SL_13- 617_Interested Parties
Scot	McClure		Interstate Power And Light Company	4902 N Biltmore Ln PO Box 77007 Madison, WI 537071007	Paper Service	No	SPL_SL_13- 617_Interested Parties
Tom	McDougall	N/A	The Weidt Group	5800 Baker Rd  Minnetonka, MN 55345	Paper Service	No	SPL_SL_13- 617_Interested Parties

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Mike	McGlone	N/A	Heat Share - Salvation Army	2445 Prior Avenue Roseville, MN 55113	Paper Service	No	SPL_SL_13-617_Interested Parties
John	McWilliams	jmm@dairy.net	Dairyland Power Cooperative	3200 East Ave SPO Box 817 La Crosse, WI 54601-7227	Electronic Service	No	SPL_SL_13-617_Interested Parties
Brian	Meloy	brian.meloy@leonard.com	Leonard, Street & Deinard	150 S 5th St Ste 2300 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_13-617_Interested Parties
Karen	Moe	karenmoe@minncap.org	MN Community Action Partnership	100 Empire Drive Suite 202 SAINT PAUL, Minnesota 55103	Electronic Service	No	SPL_SL_13-617_Interested Parties
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	SPL_SL_13-617_Interested Parties
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_13-617_Interested Parties
Gary	Myers	garym@hpuc.com	Hibbing Public Utilities	1902 E 6th Ave Hibbing, MN 55746	Paper Service	No	SPL_SL_13-617_Interested Parties
Susan K	Nathan	snathan@appliedenergygroup.com	Applied Energy Group	2215 NE 107th Ter Kansas City, MO 64155-8513	Electronic Service	No	SPL_SL_13-617_Interested Parties
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	SPL_SL_13-617_Interested Parties
Robert	Nevitt		Energy Conservatory	2801 21st Avenue South Minneapolis, MN 55407	Paper Service	No	SPL_SL_13-617_Interested Parties

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Barbara	Nick	N/A	Minnesota Energy Resources Corporation	2665 145th Street PO Box 455 Rosemount, MN 55068-0455	Paper Service	No	SPL_SL_13- 617_Interested Parties
Diane E.	Nordstrom	Diane.Nordstrom@state.mn.us	Office of Administrative Hearings	PO Box 64620  St. Paul, MN 551640620	Electronic Service	No	SPL_SL_13- 617_Interested Parties
Gary	Olson		Product Recovery, Inc.	2605 E Cliff Rd  Burnsville, MN 55337	Paper Service	No	SPL_SL_13- 617_Interested Parties
Kim	Pederson	kpederson@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	SPL_SL_13- 617_Interested Parties
Audrey	Peer	audrey.peer@centerpointenergy.com	CenterPoint Energy	800 Lasalle Avenue - 14th Floor  Minneapolis, Minnesota 55402	Electronic Service	No	SPL_SL_13- 617_Interested Parties
James	Phillippo	jophillippo@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	PO Box 19001  Green Bay, WI 54307-9001	Electronic Service	No	SPL_SL_13- 617_Interested Parties
Lisa	Pickard	lpickard@minnkota.com	Minnkota Power Cooperative	1822 Mill Rd PO Box 13200 Grand Forks, ND 582083200	Electronic Service	No	SPL_SL_13- 617_Interested Parties
Bill	Poppert		Technology North	2433 Highwood Ave  St. Paul, MN 55119	Paper Service	No	SPL_SL_13- 617_Interested Parties
Kent	Ragsdale	kentragdale@alliantenergy.com	Alliant Energy-Interstate Power and Light Company	P.O. Box 351 200 First Street, SE Cedar Rapids, IA 524060351	Electronic Service	No	SPL_SL_13- 617_Interested Parties
Michael	Sachse	N/A	Opower	1515 N Courthouse Rd FL 8  Arlington, VA 22201	Paper Service	No	SPL_SL_13- 617_Interested Parties

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Jeff	Sande		Bemidji State University	Box 1 Deputy Hall 1500 Birchmont Drive Bemidji, MN 566012699	Paper Service	No	SPL_SL_13- 617_Interested Parties
Bruce	Sayler	bruces@connexusenergy.com	Connexus Energy	14601 Ramsey Boulevard  Ransey, MN 55303	Electronic Service	No	SPL_SL_13- 617_Interested Parties
Cindy	Schweitzer Rott	cindy.schweitzer@clearesult.com	CLEAResult's	S12637A Merrilee Rd.  Spring Green, WI 53588	Electronic Service	No	SPL_SL_13- 617_Interested Parties
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	Ste 122 9100 W Bloomington Frwy Bloomington, MN 55431	Electronic Service	No	SPL_SL_13- 617_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_13- 617_Interested Parties
Tom	Smilanich		Passive Concepts	228 6th Ave N  South St. Paul, MN 55075	Paper Service	No	SPL_SL_13- 617_Interested Parties
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd  St. Paul, MN 55102	Electronic Service	No	SPL_SL_13- 617_Interested Parties
Sara	Smith	sara.smith@metc.state.mn.us	Metropolitan Council	390 Robert St N  St. Paul, MN 55101-1805	Electronic Service	No	SPL_SL_13- 617_Interested Parties
Steve	Sorenson	N/A	Constellation Energy	1202 Wilson Avenue  Cloquet, MN 55720	Paper Service	No	SPL_SL_13- 617_Interested Parties
Byron E.	Starns	byron.starns@leonard.com	Leonard Street and Deinard	150 South 5th Street Suite 2300 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_13- 617_Interested Parties

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Kristin	Stastny	stastny.kristin@dorsey.com	Dorsey & Whitney LLP	50 South 6th Street Suite 1500 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_13- 617_Interested Parties
Leo	Steidel	N/A	The Weidt Group	5800 Baker Rd  Minnetonka, MN 55345	Paper Service	No	SPL_SL_13- 617_Interested Parties
John	Steinhoff		Resource Solutions, Inc.	318 Kensington Drive  Madison, WI 53704	Paper Service	No	SPL_SL_13- 617_Interested Parties
Sheldon	Strom		Center For Energy And Environment	212 3rd Ave N Ste 560  Minneapolis, MN 554011459	Paper Service	No	SPL_SL_13- 617_Interested Parties
Dale	Sullivan	N/A	Ramsey Action Programs	3315 Labore Rd  Vadnais Heights, MN 55110	Paper Service	No	SPL_SL_13- 617_Interested Parties
Deb	Sundin	deb.sundin@xcelenergy.com	Xcel Energy	414 Nicollet Mall  Minneapolis, MN 55401	Electronic Service	No	SPL_SL_13- 617_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_13- 617_Interested Parties
Richard	Szydlowski	N/A	Center for Energy & Environment	212 3rd Ave N Ste 560  Minneapolis, MN 55401-1459	Paper Service	No	SPL_SL_13- 617_Interested Parties
SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_13- 617_Interested Parties
Steve	Tomac	N/A	Basin Electric Power Cooperative	1717 E Interstate Ave  Bismarck, ND 58501	Paper Service	No	SPL_SL_13- 617_Interested Parties

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Laurance R.	Waldoch		Lindquist & Vennum	4200 IDS Center 80 South 8th Street Minneapolis, MN 554022274	Paper Service	No	SPL_SL_13- 617_Interested Parties
Robert	Walsh	bwalsh@mnvalleyrec.com	Minnesota Valley Coop Light and Power	PO Box 248 501 S 1st St Montevideo, MN 56265	Electronic Service	No	SPL_SL_13- 617_Interested Parties
Gregory	Walters	gjwalters@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	3460 Technology Dr. NW  Rochester, MN 55901	Electronic Service	No	SPL_SL_13- 617_Interested Parties
Rebecca	Wentler	N/A	Otter Tail Power Company	215 S Cascade St  Fergus Falls, MN 56538-0496	Paper Service	No	SPL_SL_13- 617_Interested Parties
Casey	Whelan		U.S. Energy Services, Inc.	Suite 1200 605 Highway 169 North Minneapolis, MN 554416531	Paper Service	No	SPL_SL_13- 617_Interested Parties
Lisa	Wilson	lisa.wilson@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2  Superior, WI 54880	Electronic Service	No	SPL_SL_13- 617_Interested Parties
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE  Cedar Rapids, IA 52401	Electronic Service	No	SPL_SL_13- 617_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_13- 617_Interested Parties