

August 30, 2019

PUBLIC DOCUMENT

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

RE: Request to Accept Corrections to the Comments of the Minnesota Department of Commerce, Division of Energy Resources
Docket No. G011/M-19-282

Dear Mr. Wolf:

The Minnesota Department of Commerce, Division of Energy Resources (Department) respectfully requests that the Minnesota Public Utilities Commission (Commission) accept corrections to its PUBLIC and TRADE SECRET comments filed on August 23, 2019. The corrections, referenced by Comments section and page numbers, are offered in redline below.

In Section III.B.2.a, page 17:

Therefore, the Department recommends that the Commission require MERC to reduce its estimated cost amount included in its 2020 GUIC for this project work ~~by to~~ \$1.25 million, [...]

In Section III.C.4, page 22:

MERC stated that some recent IRS Private Letter Rulings (PLRs) indicated that rider true-ups cannot reverse the effects of ADIT proration. As a result, MERC proposes not only to prorate its original forecasted ADIT balance for true-up purposes but also to reflect an additional ~~proration of adjustment to~~ reflect account for the 13-month average of the difference between its forecasted non-prorated ADIT balance and its actual non-prorated ADIT balance.

In Section IV, page 27:

Require the estimated cost amount included in its 2020 test-year for the Stop Valve Survey project to be ~~decreased by~~ set to \$1.25 million.

The Department provides these corrections for clarity and apologizes for any inconvenience and is available to answer any questions that the Commission may have.

Sincerely,

/s/ DOROTHY MORRISSEY
Financial Analyst

DM/ar

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 – REQUEST TO ACCEPT CORRECTIONS TO COMMENTS

Docket Nos. **G011/M-19-282**

Dated this **30th** day of **August, 2019**.

/s/Linda Chavez

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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-282_M-19-282
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-282_M-19-282
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Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_19-282_M-19-282
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