



**Minnesota Energy Resources**

**An Integrys Energy Group Company**

1995 Rahnclyff Court, Suite 200

Eagan, MN 55122

[www.minnesotaenergyresources.com](http://www.minnesotaenergyresources.com)

May 28, 2015

**VIA ELECTRONIC FILING**

Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
St. Paul, MN 55101

Re: Minnesota Energy Resources Corporation Petition for Approval of 2014 Conservation Improvement Program Tracker Account, Demand Side Management Financial Incentive, and Conservation Cost Recovery Adjustment, Docket No. G011/M-15-420, MERC Correction to Conservation Cost Recovery Adjustment Calculation

Dear Mr. Wolf:

Minnesota Energy Resources Corporation (MERC or the Company) submits this filing to amend the proposed Conservation Cost Recovery Adjustment (CCRA) calculation filed on May 1, 2015, in this docket.

In the May 1 filing, MERC filed a Petition for approval of its 2014 Conservation Improvement Program (CIP) Tracker Account, 2014 Demand Side Management (DSM) Financial Incentive, and a revised CCRA factor to be effective January 1, 2016. After that filing was submitted, MERC identified errors in the amount of Conservation Cost Recovery Charge (CCRC) recoveries credited to the tracker for October 2014 through March 2015. MERC adjusted the CIP tracker to correct for this error in April 2015.

Additionally, MERC has completed the refund of the PNG CCRA over-collection, which required a slight adjustment to the tracker balance in April 2015. Our projected 2015 tracker balance has changed as a result of these adjustments, and MERC submits this letter and revised Attachment C to correct the CCRA proposed for approval effective January 1, 2016. The April 2015 tracker adjustments are discussed below.

First, MERC has adjusted the 2015 tracker to account for an error in the amount of CCRC recovery included for October 2014 through March 2015. Because MERC's CCRC factor is fully embedded in the distribution charge MERC calculates the total monthly CCRC revenue by multiplying the CIP-applicable monthly sales volumes by the applicable CCRC rate. Beginning in October 2014, a number of CIP-exempt customers were transferred to new CIP-exempt rate codes, which caused MERC to over-report the amount of CCRC revenue actually collected from customers. All CIP-applicable and CIP-exempt customers were billed correctly during this period; only the tracker entry was incorrect. MERC has corrected this error with an adjustment in April 2015 of



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\$2,116,257.91 -- the amount of revenue overstated for the period October 2014 through March 2015 plus an adjustment to correct the carrying charge so that the tracker account would accurately reflect the current CIP expense as though the error had not occurred. Attachment 1 to this filing is MERC's updated 2015 CIP tracker through April 2015 and Attachment 2 shows the detailed calculation of the adjustment amount. Public and nonpublic versions of Attachment 1 are included with this filing as separate attachments. The nonpublic version of Attachment 1 contains customer information that is not generally known to, and not readily ascertained by vendors and competitors of MERC, who could obtain economic value from its disclosure. The nonpublic version of Attachment 1 contains data which qualifies as "Trade Secret Data" pursuant to Minnesota Statutes section 13.37, Subdivision 1(b).

The second tracker adjustment was necessary to complete the PNG refund. On September 15, 2014, MERC submitted a Compliance Filing in Docket No. G011/M-14-369, informing the Commission that in August 2014 MERC determined that the MERC-PNG tracker account had reached a negative balance of approximately \$1.8 million. MERC has now completed refunding the PNG customers for the CCRA amount over-collected. With interest, MERC refunded a total of \$1,964,069 to these customers in November and December 2014. In April 2015, a final true-up adjustment was made to close out the refund of the over-collection balance. This adjustment of \$10,663 is reflected in Attachment 1 to this filing.

MERC has recalculated its proposed CCRA to take into account the adjustments made to the tracker in April 2015. Attachment 3 to this filing shows the revised calculation of MERC's proposed CCRA factor, which MERC has requested to implement effective January 1, 2016.

Please contact me at (651) 322-8965 if you have any questions.

Sincerely,

/s/ Amber S. Lee

Amber S. Lee  
Regulatory and Legislative Affairs Manager  
Minnesota Energy Resources Corporation

Attachment 1 Filed Separately as Public and Nonpublic

MERC

One-Time Adjustment for CCRC CIP Exempt Rate Code Error

Minnesota Energy Resources Corporation

Attachment 2

Docket No. G011/M-15-420

Month	CIP Exempt Volumes In Error (Therms)	CCRC	One-Time Adjustment CCRC	Monthly Carrying Charge %	Months to Accrue	One-Time Adj. Carrying Charge	Total CCRC + Carry Charge
Oct-14	8,732,752	\$ 0.02448	\$ 213,777.77	0.6523%	7	\$ 9,761.18	\$ 223,538.95
Nov-14	10,603,731	\$ 0.02448	\$ 259,579.33	0.6523%	6	\$ 10,159.29	\$ 269,738.62
Dec-14	11,803,251	\$ 0.02448	\$ 288,943.58	0.6523%	5	\$ 9,423.77	\$ 298,367.36
Jan-15	19,683,003	\$ 0.02448	\$ 481,839.91	0.1957%	4	\$ 3,772.32	\$ 485,612.24
Feb-15	19,244,754	\$ 0.02448	\$ 471,111.58	0.1957%	3	\$ 2,766.25	\$ 473,877.83
Mar-15	16,380,953	\$ 0.02448	\$ 401,005.73	0.1957%	2	\$ 1,569.74	\$ 402,575.47
	<u>86,448,444</u>		<u>\$ 2,116,257.91</u>			<u>\$ 37,452.55</u>	<u>\$ 2,153,710.46</u>

Increase to  
Tracker Balance  
Recorded in  
April 2015

Increase to  
Tracker Balance  
Recorded in  
April 2015

MERC Revised CCRA Calculation

Proposed Effective Date: January 1, 2016

Forecasted beginning balance (January 1, 2016)	\$ (125,173.68) <sup>1</sup>
Proposed Expenditures (January 2016-December 2016)	\$11,500,000.00 <sup>2</sup>
Forecasted 2014 Incentive (to be approved in 2015)	\$2,093,158
Forecasted 2015 Incentive (to be approved in 2016) <sup>3</sup>	\$2,393,887
Less forecasted CCRC recovery (January 2016-December 2016)	\$ 12,279,555.00
Projected Carrying Charges for 2016	\$(95,419.60)
Forecasted December 2016 Balance	\$3,486,896.72
Forecasted Gas Sales (January 2016-December 2016)	409,045,784 therms
CCRA= \$/therm beginning January 1, 2016	\$0.00852/therm

<sup>1</sup> This estimate does not account for the proposed 2014 DSM financial incentive.

<sup>2</sup> MERC's approved budget for 2015 in the Department of Commerce's decision of April 30, 2013 in Docket No. G007,G011/CIP-12-548 was \$9,880,403. Because MERC has acquired Interstate Power and Light's ("IPL") Minnesota natural gas operations and IPL customers have been converted to MERC, including MERC's CIP, MERC is planning to propose to increase the budget for 2015. The actual amount of the budget adjustment proposal has not yet been finalized, however, based on available information, MERC has initially estimated a revised 2015 budget of \$11,099,999 to account for the transitioned IPL customers. For purposes of the CCRA calculation, MERC used an approximation of \$11,500,000 for 2016 CIP expense. The actual budget proposal will be filed for approval on June 1, 2015.

<sup>3</sup> From MERC's January 30, 2015 Compliance Filing, 2015 Financial Incentive Proposal in Docket Nos. E,G999/CI-08-133; G011/M-14-84.

AFFIDAVIT OF SERVICE

STATE OF MINNESOTA            )  
  ) ss  
COUNTY OF HENNEPIN        )

Kristin M. Stastny hereby certifies that on the 28th day of May, 2015, on behalf of Minnesota Energy Resources Corporation (MERC) she electronically filed a true and correct copy of the attached Letter on [www.edockets.state.mn.us](http://www.edockets.state.mn.us). Said documents were also served via U.S. mail and electronic service as designated on the attached service list.

/s/ Kristin M. Stastny  
Kristin M. Stastny

Subscribed and sworn to before me  
This 28th Day of May, 2015.

/s/ Alice Jaworski  
Notary Public, State of Minnesota

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