

February 24, 2016

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

RE: **Reply Comments of the Minnesota Department of Commerce,
Division of Energy Resources**
Docket Nos. E999/AA-14-579 and E015/M-15-875

Dear Mr. Wolf:

In the interests of addressing concerns raised by Minnesota Power (MP or the Company) and in light of the Company's recognition of its inadvertent disclosure of trade secret data, the Minnesota Department of Commerce, Division of Energy Resources (DOC or the Department) refiles the public version of its December 14, 2015 Reply Comments and has removed the original version of that document from eDockets.

As stated in these comments, the goal is to ensure that MP's ratepayers receive the credits as soon as possible. The Department appreciates the Company's efforts in obtaining these credits.

Sincerely,

/s/ KATE O'CONNELL
Manager

/s/ SAMIR OUANES
Rate Analyst

KO/SO/lt
Attachment

December 14, 2015

PUBLIC DOCUMENT

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

RE: **PUBLIC Reply Comments of the Minnesota Department of Commerce,
Division of Energy Resources**
Docket Nos. E999/AA-14-579 and E015/M-15-875

Dear Mr. Wolf:

On September 30, 2015, Minnesota Power (MP or the Company) submitted a petition (Petition) requesting that the Minnesota Public Utilities Commission (Commission) approve Minnesota Power's proposed allocation of a settlement payment to the customers who were affected by service issues during the periods of October 2013-February 2014 and July 2014-November 2014.

On October 19, 2015, MP requested an extension of time to provide responses to the Minnesota Department of Commerce, Division of Energy Resources (DOC or the Department) Information Requests 1-7 on or before October 30, 2015.

To ensure a prompt recovery of the settlement payment by MP's customers, the Department filed its initial comments (Comments) on the October 30, 2015 comment deadline with the understanding that MP would complete the record through reply comments as requested through discovery and in the Comments. As discussed further in the Comments, the Department identified several issues with MP's initial filing, including but not limited to:

- MP did not provide documentation identifying the amount received and when it was received.
- MP did not provide the narrative and documentation to show that the amount received in the negotiated settlement is reasonable.
- MP did not provide a narrative fully discussing and quantifying any and all potential trade-offs that may have been needed to obtain the settlement payment, including but not limited to possibly (or potentially) less favorable terms for **[TRADE SECRET DATA HAS BEEN EXCISED]**.
- MP did not provide a narrative fully explaining and guiding the reader through the process used by MP to calculate the WPPI Credit Amount, and fully justifying why the WPPI Credit Amount and the process MP used to calculate this amount are reasonable.

- The Company used data from MP's last rate case in 2009 (2009 Rate Case, Docket No. E015/GR-09-1151), which is inconsistent with the way MP's customers were actually overcharged as a result of "the service issues."¹
- MP proposes for the credit to Magnetation Plant IV (Magnetation), to be taken out of the Other Retail Credit Amount instead of the Large Power Credit Amount. The Department does not object to Magnetation receiving a fair share of the refund, but MP's proposal would unfairly require only ratepayers who are not in the Large Power class to give up a portion of their share of the refund for Magnetation.
- MP's proposal is inconsistent with the Company's calculation in its annual automatic adjustment (AAA) reports of its monthly "Fuel Cost Recovery" from its retail customers, which are adjusted by specific customer class cost factors (E8760 allocation factors).
- MP's proposal to allocate the Large Power Credit Amount based on "firm kWh," instead of the actual retail kWh sales that were the basis of MP's fuel cost recovery, would not provide refunds to ratepayers commensurate to the amounts of electricity they used during this time.

In light of the issues raised above, and based on the information available by the October 30, 2015 deadline, the Department recalculated the proposed Wholesale, Large Power and Other Retail Credit Amounts with actual kWh data used by MP to calculate its monthly fuel cost recovery during the relevant time periods when these customers were overcharged as a result of "the service issues."² The Department provided a clear identification of the formulas used and the source of the data in Attachment 2 of the Comments.

Based on the limited amount of information provided by MP in the record, the Department recommended that the Commission deny MP's proposed refund method and require MP to credit the Wholesale Credit Amount of [TRADE SECRET DATA HAS BEEN EXCISED] to its Wholesale customers according to the Company's proposed method on page 4 of 5 of MP's Attachment A and to flow through the Fuel Clause Adjustment (FCA) the Credit Amount of [TRADE SECRET DATA HAS BEEN EXCISED].³

In addition, the Department included two alternative refund options for the Commission's consideration and requested MP to fully discuss each of the three options in reply comments to help support the Commission's decision making process.⁴

On November 13, 2015, MP filed reply comments (MP Reply Comments).

The Department discusses below in turn each of the issues raised by MP Reply Comments.

¹ Source: Comments at 4.

² Source: Comments at 5-6.

³ The Department's initial calculation of the recommended Retail and Wholesale Credit Amounts are discussed on pages 4-5 of the Comments.

⁴ Source: Section II.5 of the Comments; the three refund methods are summarized for ease of reference as Attachment 1 to these reply comments.

- A. *DID MP PROVIDE IN REPLY COMMENTS A NARRATIVE AND DOCUMENTATION SHOWING THAT THE AMOUNT RECEIVED IN THE NEGOTIATED SETTLEMENT IS REASONABLE OR, AT A MINIMUM, DOCUMENTATION IDENTIFYING THE AMOUNT RECEIVED AND WHEN IT WAS RECEIVED?*

No. Instead, the Company stated that:⁵

A separate settlement agreement does not exist related to the negotiated settlement. The negotiated settlement was part of the newly negotiated contract with the coal transportation provider. Through the contract negotiation process, Minnesota Power attempted to recoup 100% of the impact to its customers. At the beginning of the negotiation process the coal transportation provider countered with no payment at all. Through months of negotiations, the parties settled on the final amount of [TRADE SECRET DATA EXCISED].

As noted in Minnesota Power's response to IR 23, Attachment 1 in Docket AA-14-579 and related Reply Comments to the same docket, due to the confidential nature of the contract, the coal transportation provider did not consent to Minnesota Power disclosing for filing a copy of the contract to the Department. However, the coal transportation provider [sic] did consent to an in-camera review of that contract by the Department upon its request. The coal transportation provider has reiterated its consent to an *in-camera* review upon the Department's request.

The Department notes that the FYE14 AAA proceeding (14-579) to which MP refers, on page 16 of in its August 26, 2015 Reply Comments, the Department stated:

Because MP did not provide a copy of its contract with BNSF, the Department was unable to refer to the contract for guidance on this issue. Thus, the Department cannot conclude that MP fully met its burden of proof to show that the rates MP charged to its ratepayers were reasonable.

That is, the Department could not conclude in that proceeding that MP met its burden of proof to show that the rates charged to its ratepayers during the July 2013-June 2014 period of the FYE14 AAA were reasonable, in part because of MP's unwillingness to provide a complete copy of its rail transportation contract. Further, in MP's October 2, 2015 Reply Comments, MP offered to provide only an in-camera review of a *redacted* copy of the Agreement⁶

⁵ Source: MP Reply Comments at 1-2.

⁶ MP's October 2, 2015 Reply Comments in the FYE14 AAA docket stated on page 1 of 2 of MP's response to DOC Information Request 23 "BNSF will consent to an in camera review by a representative of the Minnesota

The issue of the reasonableness of the rates that MP charged to its ratepayers during the July 2013 through June 2014 time period is not at issue in the instant docket; that matter is in the FYE14 AAA docket. While the Department cannot verify that the amount of the refund is the amount that MP asserts, it is important to refund as soon as possible MP's customers their share of the full settlement amount of the [TRADE SECRET DATA HAS BEEN EXCISED] that MP claims it received from the coal transportation provider. Thus, the Department takes Minnesota Power at its word that the asserted amount of the refund is correct.

B. DID MP PROVIDE A NARRATIVE IN REPLY COMMENTS FULLY DISCUSSING AND QUANTIFYING ANY AND ALL POTENTIAL TRADE-OFFS THAT MAY HAVE BEEN NEEDED TO OBTAIN THE SETTLEMENT PAYMENT, INCLUDING BUT NOT LIMITED TO POSSIBLY (OR POTENTIALLY) LESS FAVORABLE TERMS FOR [TRADE SECRET DATA HAS BEEN EXCISED]?

No. MP simply referenced an attachment in another docket, the FYE15 AAA docket (15-611):⁷

In regards to the Department's inquiry as to "potential trade-offs that were needed to obtain the settlement payment, including but not limited to possibly (or potentially) less favorable terms for the agreement, Minnesota Power references Docket AA-15-611 Attachment No. 1 – Fuel and Energy Source Procurement, under the Minnesota Power's Coal & Transportation Procurement Strategy section.

The Department notes that the above-referenced attachment does not include the requested narrative. Nonetheless, as noted above, since the goal is for the refund to be provided to MP's ratepayers as soon as possible, the Department does not pursue this issue at this time.

C. DID MP EXPLAIN HOW THE WPPI CREDIT AMOUNT WAS CALCULATED?

Yes. MP stated that the allocation of the [TRADE SECRET DATA HAS BEEN EXCISED] was based on each party's share of the total replacement energy costs incurred as the result of the events.⁸

The Department notes that MP has previously explained that WPPI needed to receive a portion of the [TRADE SECRET DATA HAS BEEN EXCISED] amount "due to their partial ownership in Boswell Unit 4."⁹

Department of Commerce of a redacted version of the Agreement provided by BNSF at an office of your choosing in Minneapolis or St. Paul." [Emphasis added]

⁷ Source: MP Reply Comments at 2.

⁸ Source: MP Reply Comments at 2.

⁹ Source: MP's September 30, 2015 comments at 4.

The Department does not object to this allocation, and notes that the Company identified “a slight error after further review of the allocation calculation.”¹⁰ MP’s revised allocation of the [TRADE SECRET DATA HAS BEEN EXCISED] increases WPPI Credit Amount from [TRADE SECRET DATA HAS BEEN EXCISED] and decreases by about 0.25 percent the remaining amount (Credit Amount) to be allocated to MP’s customers from [TRADE SECRET DATA HAS BEEN EXCISED].

Using the same methodology discussed in the Comments at 5-6, the Department revised its calculation of the Wholesale, Large Power and Other Retail Credit Amounts as a result of MP’s correction of the Credit Amount:

Credit Amount	Initial DOC	Revised DOC	% change
Residential	[TRADE SECRET DATA HAS BEEN EXCISED]	[TRADE SECRET DATA HAS BEEN EXCISED]	-0.25%
General Service			-0.25%
Large Light & Power			-0.25%
Large Power			-0.25%
Municipal Pumping			-0.25%
Lighting			-0.25%
Retail Credit Amount			-0.25%
Other Retail Amount			-0.25%
Wholesale Amount			-0.25%
Total Credit Amount			-0.25%

D. *DID MP PROVIDE A NARRATIVE FULLY EXPLAINING IN LAYMAN’S TERMS WHAT THE CONCEPT OF “FIRM KWH” REPRESENTS AND/OR MEASURES, AND FULLY JUSTIFYING WHY IT IS REASONABLE TO USE “FIRM KWH” SALES IN THE CALCULATION OF THE AMOUNTS TO BE CREDITED TO INDIVIDUAL LARGE POWER CUSTOMERS, INSTEAD OF THE ACTUAL RETAIL KWH SALES THAT WERE THE BASIS OF MP’S FUEL COST RECOVERY?*

MP provided the following narrative:¹¹

Under normal circumstances, and without any corrections to billing units after the AAA filings are made, these two definitions are the same. In the event that billing corrections need to be made after the AAA filing is submitted, differences can occur.

Attachment 2 reconciles the monthly kWh sales as shown in the AAA filings to the firm kWh used in Minnesota Power’s allocation methodology as originally filed in this docket.

¹⁰ Source: MP’s September 30, 2015 comments at 4.

¹¹ Source: MP Reply Comments at 3.

Since the kWh originally shown in the AAA filings are not the kWh that the customers ultimately paid fuel costs on, Minnesota Power recommends the usage of the adjusted kWh as the basis for the allocation of the Credit Amount between customer classes.

The Department is not aware that MP filed any supplemental filing in the relevant AAA dockets (FYE14 AAA at 14-579 and FYE15 AAA at 15-611) to identify and correct the “billing corrections” that the Company indicated it needed to do in the instant proceeding. Further, the records in the Company’s FYE14 AAA and the FYE15 AAA reports do not show that MP discussed and corrected these “billing corrections.”

Referring to the two alternative refund methods discussed in Section II.5 of the Comments and summarized for ease of reference in Attachment 1, if the Commission opts for either Method 2 (Direct Credit to Affected Customers) or Method 3 (Direct Credit to Wholesale customers and Large Power customers and FCA Credit for MP’s Other customers), the Department still recommends that the allocation of the Credit Amount between retail customer classes be based on the actual kWh retail sales by class that were used by MP in its FYE14 and FYE15 AAA reports to calculate “the revenues collected from customers for energy delivered” in compliance with Minnesota Rules Part 7825.2810, subpart 1.

E. DID MP OPPOSE METHOD 1 (FCA METHOD) OR METHOD 2 (DIRECT CREDIT TO AFFECTED CUSTOMERS) AND, IF SO, DID MP FULLY DISCUSS AND JUSTIFY ITS OPPOSITION IN REPLY COMMENTS, INCLUDING WHY ANY IDENTIFIED ISSUES WITH METHOD 1 CANNOT BE ALLEVIATED?¹²

No. Therefore, the Department concludes that MP does not oppose the Department’s recommendation to deny MP’s proposed refund method and require MP to credit the Wholesale Credit Amount **[TRADE SECRET DATA HAS BEEN EXCISED]** to its Wholesale customers according to the Company’s proposed method on page 4 of 5 of MP’s Attachment A, and to flow through the Fuel Clause Adjustment (FCA) the Credit Amount of **[TRADE SECRET DATA HAS BEEN EXCISED]**.¹³

The Department notes that MP offered a “compromise methodology,” but given that MP did not offer any argument opposing the Department recommendation, and did not provide support for its “compromise methodology,” the Department stands by its recommendation above.¹⁴

¹² Attachment 1 to these reply comments summarizes the alternative credit methods added to the record in the Comments at 7-10 for the Commission’s consideration.

¹³ This is the same refund method recommended by the Departments in the Comments, with an adjustment to the Credit Amount.

¹⁴ The only support offered for the “compromise methodology” was as follows: “Attachment 3 shows the utilization of the reconciled kWh as discussed above to allocate the Credit Amount between customer classes.” Source: MP Reply Comments at 3.

Based on the discussion above and the record to date, the Department recommends that the Commission require MP to credit the Department's calculated Wholesale Credit Amount **[TRADE SECRET DATA HAS BEEN EXCISED]** to its Wholesale customers according to the Company's proposed method on page 4 of 5 of MP's Attachment A, and to flow through the FCA the Retail Credit Amount of **[TRADE SECRET DATA HAS BEEN EXCISED]**. The Department notes that this is the retail credit method that was proposed by Xcel Energy and approved by the Commission in a recent refund filing in Docket No.E002/M-14-614.

Given that both MP and the Department have had sufficient opportunity to vet the issues in this docket and the Department's concern that the customer refund should be provided as soon as possible, the Department respectfully recommends that no further comments be provided in this matter. The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ SAMIR OUANES
Public Utilities Rates Analyst

SO/lt

Attachment 1

I. Method 1: FCA Method

Under Method 1, MP should:

- credit the Wholesale Credit Amount to its Wholesale customers according to the Company's proposed method on page 4 of 5 of MP's Attachment A; and
- either credit through the FCA the Retail Credit Amount in the first month following the Commission's Order in this matter, or in equal monthly credits over a reasonably short period.

II. Method 2: Direct Credit to Affected Customers

Method 2.a: Use of FCA kWhs

Under Method 2.a, MP should:

- credit the Wholesale Credit Amount to its Wholesale customers according to the Company's proposed method on page 4 of 5 of MP's Attachment A; and
- allocate the Credit Amount of each retail customer class as calculated above by the Department to individual customers based on their contribution to the total (FCA) energy sales for their respective classes for the impacted billing months.

Method 2.b: Use of "Firm kWhs"

Under Method 2.b, MP should:

- credit the Wholesale Credit Amount to its Wholesale customers according to the Company's proposed method on page 4 of 5 of MP's Attachment A; and
- allocate the Credit Amount of each retail customer class as calculated above by the Department to individual customers based on their contribution to the total "firm" energy sales for their respective classes for the impacted billing months.

III. Method 3: Direct Credit to Wholesale and Large Power Customers and FCA Credit for Other Retail Customers

Method 3.a: Use of FCA kWhs

Under Method 3.a, MP should:

- credit the Wholesale Credit Amount to its Wholesale customers according to the Company's proposed method on page 4 of 5 of MP's Attachment A;
- allocate the Large Power Credit Amount as calculated above by the Department to individual Large Power customers based on their contribution to the total (FCA) energy sales for their respective classes for the impacted billing months; and

- provide to each of its other retail customer classes the corresponding Department-calculated class Credit Amount through the FCA.

Method 3.b: Use of “firm kWhs”

Under Method 3.b, MP should:

- credit the Wholesale Credit Amount to its Wholesale customers according to the Company’s proposed method on page 4 of 5 of MP’s Attachment A;
- allocate the Large Power Credit Amount as calculated above by the Department to individual Large Power customers based on their contribution to the total “firm” energy sales for their respective classes for the impacted billing months; and
- provide to each of its other retail customer classes the corresponding Department-calculated class Credit Amount through the FCA.

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
Reply Comments**

Docket No. E999/AA-14-579 and E015/M-15-875

Dated this 24th day of February 2016

/s/Sharon Ferguson

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