



Minnesota Energy Resources Corporation
2685 145th Street West
Rosemount, MN 55068
www.minnesotaenergyresources.com

December 12, 2018

**PUBLIC DOCUMENT
TRADE SECRET DATA HAS BEEN
EXCISED**

VIA ELECTRONIC FILING

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

Re: Reply Comments of Minnesota Energy Resources Corporation, 2016-2017 Annual Automatic Adjustment Reports and Purchased Gas Adjustment True-Up Filings

Docket Nos. G999/AA-17-493, G011/AA-17-654, G011/AA-17-655, and G011/AA-17-656

Dear Mr. Wolf:

On December 4, 2018, The Minnesota Department of Commerce, Division of Energy Resources (the "Department") submitted its annual report in the above-referenced dockets regarding Minnesota Energy Resources Corporation's ("MERC's" or the "Company's") Annual Automatic Adjustment ("AAA") and purchased gas adjustment ("PGA") True-Up Filings. Within this report the Department recommends the Commission:

- accept MERC-NNG's FYE17 true-up filing in Docket No. G011/AA-17-656;
- allow MERC-NNG to implement its true-up, as shown in Department Attachment G8 of the FYE17 AAA Report;
- accept MERC-CON's FYE17 true-up filing in Docket No. G011/AA-17-655;
- allow MERC-Consolidated to implement its true-up, as shown in Department Attachment G9 of the FYE17 AAA Report; and
- accept MERC-AL's FYE17 true-up filing in Docket No. G011/AA-17-654 as informational.

The Department further requests that MERC provide additional information. In particular, the Department requests that MERC provide in its Reply Comments a discussion of the treatment of its gas losses due to damages for each PGA system and that in future AAA filings, MERC provide totals for Schedule Q, Third Party Damage.

MERC thanks the Department for its analysis and review and appreciates the Department's recommendation that the Commission accept the AAA reports and approve implementation of the true-up rates. MERC submits these Reply Comments to respond to the Department's requests for additional information.¹

First, with respect to the Department's request that the Company provide a discussion of the treatment of gas losses due to damages for each PGA system, MERC notes that in instances where gas losses occur due to damage, MERC bills lost gas charges to the party responsible for damages. Any revenue collected from those third parties are netted against the commodity cost, thereby reducing the overall gas costs for the AAA period. For the 2016-2017 gas year, the following amounts were credited to the commodity costs:

PGA	\$ Amount Credited to Commodity
NNG	\$9,533.45
Albert Lea	\$1,943.67
Consolidated	\$2,853.85

Second, with respect to Schedule Q, MERC is including revised Schedules Q with the total gas losses and amounts billed summed as attachments to this filing. MERC will ensure that Schedule Q includes totals for future AAA filings. The nonpublic version of these revised Schedules Q contain trade secret information that is not generally known to and not readily ascertainable by vendors or competitors of MERC, who could obtain economic value from its disclosure. MERC maintains this information as secret.

Please contact me at (920) 433-2926 if you have any questions regarding the information in this filing. Thank you for your attention to this matter.

Sincerely,

/s/ Seth DeMerritt

Seth DeMerritt
Senior Project Specialist
Minnesota Energy Resources Corporation

Enclosure
cc: Service List

¹ Additionally, MERC notes that the information contained in Table G15 on page 46 of the Department's Report contained an error with respect to the MERC-Consolidated annual customer charges. This error was a result of an incorrect formula in the spreadsheet provided in response to Department Information Request No. 1. MERC has submitted a correction to the Department.

MINNESOTA ENERGY RESOURCES - NNG

Schedule Q

Third Party Damage Bills July 2016- June 2017

[TRADE SECRET DATA BEGINS...

Page 1 of 1

Customer	Date of Damage	Gas Loss Dths	Gas Loss Billed
	8/16/2016	2.86	\$ 10.35
	8/2/2016	0.44	\$ 1.64
	10/29/2016	0.21	\$ 0.81
	11/3/2016	9.80	\$ 39.50
	11/7/2016	6.16	\$ 24.84
	3/23/2017	41.88	\$ 164.86
	9/26/2016	167.43	\$ 642.18
	9/13/2016	24.41	\$ 103.91
	11/2/2016	5.37	\$ 21.62
	2/13/2017	151.28	\$ 667.63
	7/29/2016	12.40	\$ 45.29
	9/20/2016	111.60	\$ 475.16
	8/18/2016	7.35	\$ 27.39
	10/12/2016	42.92	\$ 185.20
	8/15/2016	2.15	\$ 7.99
	10/21/2016	213.75	\$ 910.08
	11/6/2016	1.89	\$ 7.60
	9/14/2016	8.04	\$ 34.23
	10/6/2016	4.02	\$ 17.35
	9/2/2016	9.06	\$ 34.75
	7/25/2016	3.69	\$ 13.48
	9/9/2016	3.28	\$ 13.97
	10/27/2016	16.48	\$ 64.59
	1/25/2017	26.94	\$ 131.94
	7/29/2016	81.48	\$ 330.27
	8/3/2016	150.04	\$ 559.08
	8/3/2016	5.28	\$ 19.67
	12/8/2016	0.60	\$ 2.59
	12/6/2016	103.39	\$ 446.64
	12/21/2016	138.84	\$ 600.05
	10/31/2016	75.11	\$ 324.11
	10/31/2016	2.89	\$ 12.47
	7/26/2016	3.69	\$ 13.48
	8/2/2016	1.85	\$ 6.87
	8/8/2016	44.28	\$ 160.52
	8/18/2016	9.86	\$ 35.73
	11/29/2016	1.85	\$ 7.44
	11/15/2016	24.12	\$ 97.21
	9/27/2016	9.84	\$ 41.90
	9/27/2016	8.04	\$ 34.23
	9/27/2016	12.40	\$ 52.80
	7/8/2016	21.68	\$ 79.18
	12/7/2016	29.52	\$ 127.58
	7/25/2016	280.46	\$ 1,024.24
	9/21/2016	41.25	\$ 175.63
	10/24/2016	87.32	\$ 376.79
	2/8/2017	24.92	\$ 109.99
	9/26/2016	2.46	\$ 10.47
	8/25/2016	6.11	\$ 22.13
	7/26/2016	5.73	\$ 20.93
	7/27/2016	4.96	\$ 20.11
	8/26/2016	5.10	\$ 19.00
	7/26/2016	4.36	\$ 17.65
	8/25/2016	4.02	\$ 15.42
	9/30/2016	223.20	\$ 950.32
	1/10/2017	41.23	\$ 172.59

2,329.29 \$ 9,533.45

...TRADE SECRET DATA ENDS]

MINNESOTA ENERGY RESOURCES - CON

Schedule Q

Third Party Damage Bills July 2016- June 2017

[TRADE SECRET DATA BEGINS...

Page 1 of 1

Customer	Date of Damage	Gas Loss Dths	Gas Loss Billed
[REDACTED]	10/17/2016	16.08	\$ 63.02
	8/24/2016	6.94	\$ 25.14
	11/28/2016	1.45	\$ 5.52
	8/2/2016	23.21	\$ 84.12
	7/3/2016	18.60	\$ 75.40
	7/22/2016	4.65	\$ 18.85
	8/22/2016	16.08	\$ 58.29
	12/20/2016	314.82	\$ 1,203.05
	10/20/2016	2.15	\$ 8.41
	11/26/2016	15.50	\$ 57.40
	9/7/2016	1.85	\$ 7.08
	8/2/2016	10.12	\$ 36.67
	9/9/2016	35.96	\$ 137.93
	10/14/2016	5.36	\$ 21.01
	11/29/2016	267.84	\$ 991.89
	8/3/2016	9.38	\$ 34.00
	11/2/2016	5.99	\$ 22.16
	9/14/2016	1.02	\$ 3.91

757.00	\$	2,853.85
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...TRADE SECRET DATA ENDS]

MINNESOTA ENERGY RESOURCES - AL

Schedule Q

Third Party Damage Bills July 2016- June 2017

[TRADE SECRET DATA BEGINS...

Page 1 of 1

Customer	Date of Damage	Gas Loss Dths	Gas Loss Billed
	11/19/2016	1.37	\$ 5.51
	8/15/2016	9.92	\$ 35.96
	8/28/2016	66.96	\$ 242.74
	8/2/2016	188.48	\$ 683.26
	8/5/2016	3.72	\$ 13.49
	12/30/2016	208.32	\$ 900.34
	8/24/2016	6.82	\$ 24.72
	9/20/2016	8.06	\$ 30.91
	8/9/2016	1.86	\$ 6.74

495.51

1,943.67

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2016-2017 Annual Automatic Adjustment
Reports and Gas Utility PGA True-Up
Filings

Docket Nos. G999/AA-17-493, G011/AA-
17-654, G011/AA-17-655, and G011/AA-
17-656

CERTIFICATE OF SERVICE

I, Kristin M. Stastny, hereby certify that on the 12th of December, 2018, on behalf of Minnesota Energy Resources Corporation (MERC), I electronically filed a true and correct copy of the enclosed Reply Comments on www.edockets.state.mn.us. Said documents were also served via U.S. mail and electronic service as designated on the attached service list.

Dated this 12th day of December, 2018.

/s/ Kristin M. Stastny
Kristin M. Stastny

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck, ND 585014092	Electronic Service	No	OFF_SL_17-493_AA-17-493
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.	202 S. Main Street Le Sueur, MN 56058	Electronic Service	No	OFF_SL_17-493_AA-17-493
Steven	Clay	Steven.Clay@CenterPointEnergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-493_AA-17-493
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_17-493_AA-17-493
Seth	DeMerritt	ssdemerritt@integrysgroup.com	MERC (Holding)	700 North Adams P.O. Box 19001 Green Bay, WI 543079001	Electronic Service	No	OFF_SL_17-493_AA-17-493
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_17-493_AA-17-493
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_17-493_AA-17-493
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_17-493_AA-17-493
Brian	Gardow	bgardow@greatermngas.com	Greater Minnesota Gas, Inc.	PO Box 68 Le Sueur, MN 56058	Electronic Service	No	OFF_SL_17-493_AA-17-493
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.	202 South Main Street P.O. Box 68 Le Sueur, MN 56058	Electronic Service	No	OFF_SL_17-493_AA-17-493

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.	PO Box 68 202 South Main Street Le Sueur, MN 56058	Electronic Service	No	OFF_SL_17-493_AA-17-493
Lisa	Peterson	lisa.r.peterson@xcelenergy.com		Xcel Energy 414 Nicollet Mall - 7th Minneapolis, MN 55401	Electronic Service Floor	No	OFF_SL_17-493_AA-17-493
Catherine	Phillips	catherine.phillips@we-energies.com	We Energies	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_17-493_AA-17-493
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-493_AA-17-493
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_17-493_AA-17-493
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_17-493_AA-17-493
Mary	Wolter	mary.wolter@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_17-493_AA-17-493

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_17-654_AA-17-654
Michael	Auger	N/A	U S Energy Services, Inc.	Suite 1200 605 Highway 169 N Minneapolis, MN 554416531	Paper Service	No	OFF_SL_17-654_AA-17-654
Elizabeth	Brama	ebrama@briggs.com	Briggs and Morgan	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-654_AA-17-654
Jeanne	Cochran	Jeanne.Cochran@state.mn.us	Office of Administrative Hearings	P.O. Box 64620 St. Paul, MN 55164-0620	Electronic Service	No	OFF_SL_17-654_AA-17-654
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_17-654_AA-17-654
Seth	DeMerritt	ssdemerritt@integrysgroup.com	MERC (Holding)	700 North Adams P.O. Box 19001 Green Bay, WI 543079001	Electronic Service	No	OFF_SL_17-654_AA-17-654
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_17-654_AA-17-654
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Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_17-654_AA-17-654
Daryll	Fuentes	dfuentes@usg.com	USG Corporation	550 W Adams St Chicago, IL 60661	Electronic Service	No	OFF_SL_17-654_AA-17-654

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Robert	Harding	robert.harding@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-654_AA-17-654
Kimberly	Hellwig	kimberly.hellwig@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-654_AA-17-654
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	No	OFF_SL_17-654_AA-17-654
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-654_AA-17-654
Peter	Madsen	peter.madsen@ag.state.mn.us	Office of the Attorney General-DOC	Bremer Tower, Suite 1800 445 Minnesota Street St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_17-654_AA-17-654
Brian	Meloy	brian.meloy@stinson.com	Stinson, Leonard, Street LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-654_AA-17-654
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_17-654_AA-17-654
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-654_AA-17-654
Catherine	Phillips	catherine.phillips@we-energies.com	We Energies	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_17-654_AA-17-654

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-654_AA-17-654
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_17-654_AA-17-654
Colleen	Sipiorski	ctsipiorski@integrysgroup.com	Minnesota Energy Resources Corporation	700 North Adams Street Green Bay, WI 54307	Electronic Service	No	OFF_SL_17-654_AA-17-654
Kristin	Stastny	kstastny@briggs.com	Briggs and Morgan, P.A.	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-654_AA-17-654
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_17-654_AA-17-654
Casey	Whelan	cwhelan@usenergyservices.com	U.S. Energy Services, Inc.	605 Highway 169 N Ste 1200 Plymouth, MN 55441	Electronic Service	No	OFF_SL_17-654_AA-17-654
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_17-654_AA-17-654
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Elizabeth	Brama	ebrama@briggs.com	Briggs and Morgan	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-655_AA-17-655
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Darcy	Fabrizius	Darcy.fabrizius@constellation.com	Constellation Energy	N21 W23340 Ridgeview Pkwy Waukesha, WI 53188	Electronic Service	No	OFF_SL_17-656_AA-17-656
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_17-656_AA-17-656
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