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September 15, 2014

**VIA ELECTRONIC FILING**

**PUBLIC DOCUMENT- TRADE SECRET  
DATA HAS BEEN REDACTED**

Dr. Burl W. Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
St. Paul, MN 55101-2147

Re: In the Matter of a Request by Minnesota Energy Resources Corporation-PNG for Approval of the Company's 2012 CIP Tracker Account, 2012 Financial Incentive, and CCRA, Docket No. G-011/M-13-369

Petition for Approval of Minnesota Energy Resources (MERC) 2013 Consolidated CIP Tracker Account, DSM Financial Incentive, and Conservation Cost Recovery Adjustment (CCRA), Docket No. G011/M-14-369

**Minnesota Energy Resources Corporation (MERC) Compliance Filing**

Dear Dr. Haar:

On December 13, 2013, the Minnesota Public Utilities Commission entered Orders Approving 2010-2012 DSM Financial Incentives, 2012 CIP Tracker Account, and 2012 CCRA in the above referenced docket. The Commission approved a Conservation Cost Recovery Adjustment (CCRA) \$0.0420 for MERC-PNG but required that MERC suspend the CCRA factor collection when the MERC-PNG tracker balance reached zero. The Commission's Order also required that MERC file a compliance filing in this docket notifying the Commission of the suspension. In accordance with the Commission's Orders, MERC submits this Compliance Filing notifying the Commission that it has suspended collection of the CCRA factor for MERC-PNG customers.

On May 1, 2014 MERC filed its Petition for Approval of MERC's 2013 Consolidated CIP Tracker Account, DSM Financial Incentive, and Conservation Cost Recovery Adjustment (CCRA) in Docket No. G011/M-14-369. In August 2014, MERC determined that the MERC-PNG tracker account reached a negative balance of approximately \$1.8 million as a result of collections during 2014 and MERC's credit to the CIP tracker for the uncollected Conservation Cost Recovery Charge (CCRC) and CCRA amounts attributable to Northshore Mining from July 2006 through December 2013, before Northshore Mining's CIP exemption was effective January 1, 2014 (approximately \$3.4 million, including carrying costs). See Attachment A, 2014 PNG CIP Tracker, updated through August 31, 2014.

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To correct the over-collection, MERC proposes to refund non-exempt MERC-PNG customers the entire over-collection amount in the MERC-PNG tracker. For the customers that were billed in September, we will refund the exact amount they were billed. We will then refund the remaining balance using a pro rata method based on percentage of sales volumes billed in June, July and August, plus carrying charges. We anticipate the final bill credits will be included with the November bills and we will submit a compliance filing summarizing the refund upon completion.

The nonpublic version of the filing contains trade secret information. Specifically, customer account information that is not generally known to, and not readily ascertainable by vendors and competitors of MERC, who could obtain economic value from its disclosure. MERC maintains this information as secret. Accordingly the attached document contains data which qualifies as "Trade Secret Data" pursuant to Minnesota Statutes Section 13.37 Subdivision 1(b).

Please contact me at 612-340-2881 if you have any questions regarding the information in this filing. Thank you for your attention to this matter.

Sincerely yours,

/s/ Michael J. Ahern

Michael J. Ahern

cc: Service List

[TRADE SECRET DATA BEGINS...

	2013 Ending Balance	Jan-14	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Sep-14	Oct-14	Nov-14	Dec-14	2014 Total
Beginning Balace														
1. (excl. carry cost)		9,682,273.95	7,303,737.37	4,911,568.90	2,766,008.12	1,328,208.84	321,288.31	(3,020,621.89)	(3,390,742.93)	(3,761,629.85)	(3,761,629.85)	(3,761,629.85)	(3,761,629.85)	
2. Recoveries		2,338,354.37	2,351,986.27	2,105,378.56	1,397,617.07	966,738.32	504,375.69	367,649.48	370,886.92	-	-	-	-	10,402,986.68
Past recoveries:														
2.a. 3M														
2.b. PM Window														
2.c. Spectro Alloys														
2.d. Toro Company														
2.e. NorthShore Mining														
3. Incentives														
Sub Balance (excl. carry costs)														
4. (Line 1+2-3+4)	9,682,273.95	7,303,737.37	4,911,568.90	2,766,008.12	1,328,208.84	321,288.31	(3,020,621.89)	(3,390,742.93)	(3,761,629.85)	(3,761,629.85)	(3,761,629.85)	(3,761,629.85)	(3,761,629.85)	
CCRA Exemption included in balance <sup>3</sup>		184,731.46	164,698.77	149,422.70										
Ending Balance Subject to Carry Cost (Line 4-5)		7,119,005.91	4,746,870.13	2,616,585.42	1,328,208.84	321,288.31	(3,020,621.89)	(3,390,742.93)	(3,761,629.85)	(3,761,629.85)	(3,761,629.85)	(3,761,629.85)	(3,761,629.85)	
Monthly Carry Cost <sup>2</sup> (Line 6 x .00652)		46,415.92	30,949.59	17,060.14	8,659.92	2,094.80	(19,694.45)	(22,107.64)	(24,525.83)					38,852.44
Carry cost on NorthShore Mining														
7.a. Adjustment							(555,695.00)							
8. Cumulative Carry Cost	2,500,187.89	2,546,603.81	2,577,553.40	2,594,613.54	2,603,273.46	2,605,368.26	2,029,978.81	2,007,871.16	1,983,345.33	1,983,345.33	1,983,345.33	1,983,345.33	1,983,345.33	
Ending Balance (Line 4+8)	<u>12,182,461.84</u>	<u>9,850,341.18</u>	<u>7,489,122.30</u>	<u>5,360,621.66</u>	<u>3,931,482.30</u>	<u>2,926,656.57</u>	<u>(990,643.08)</u>	<u>(1,382,871.76)</u>	<u>(1,778,284.51)</u>	<u>(1,778,284.51)</u>	<u>(1,778,284.51)</u>	<u>(1,778,284.51)</u>	<u>(1,778,284.51)</u>	

...TRADE SECRET DATA ENDS]

<sup>2</sup> Carry Cost charge set at Rate of Return of 7.8275% as approved by the Commission in Docket No. G007,011/GR-10-977

<sup>3</sup> Per the January 24, 2011 Commission Order in Docket G-011/M-10-407

	9865509.069
	-347549.927
	1113882.784
	7506874.57
	5418930.935
	-426065.0549
	-496318.7124
	49795.66622
	-716409.4752
	7130605.181
	4,206,202.75

AFFIDAVIT OF SERVICE

STATE OF MINNESOTA            )  
  ) ss  
COUNTY OF HENNEPIN        )

Kristin M. Stastny hereby certifies that on the 15th day of September, 2014, on behalf of Minnesota Energy Resources Corporation (MERC) she electronically filed a true and correct copy of the enclosed Compliance Filing 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 15th day of September, 2014.

/s/ Alice Jaworski  
Notary Public, State of Minnesota

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
George	Agriesti	gagriesti@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	OFF_SL_13-369_M-13-369
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500  Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_13-369_M-13-369
Arnie	Anderson	ArnieAnderson@MinnCAP.org	Minnesota Community Action Partnership	MCIT Building 100 Empire Drive, Suite 202  St. Paul, MN 55103	Paper Service	No	OFF_SL_13-369_M-13-369
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_13-369_M-13-369
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Executive	Director	N/A	Sustainable Resources Center	1081 10th Ave SE  Minneapolis, MN 55414	Paper Service	No	OFF_SL_13-369_M-13-369
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Daryll	Fuentes	N/A	USG	550 W. Adams Street  Chicago, IL 60661	Paper Service	No	OFF_SL_13-369_M-13-369
Lara V	Greden	N/A	The Weidt Group	5800 Baker Rd  Minnetonka, MN 55345	Paper Service	No	OFF_SL_13-369_M-13-369

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Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S  Virginia, MN 55792	Electronic Service	No	OFF_SL_13-369_M-13-369
Larry	Johnston	lw.johnston@smmpa.org	SMMPA	500 1st Ave SW  Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_13-369_M-13-369

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Joel	Johnson	joel@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N  Maple Grove, MN 55369	Electronic Service	No	OFF_SL_14-369_M-14-369
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Kim	Pederson	kpederson@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_14-369_M-14-369
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Bruce	Sayler	bruces@connexusenergy.com	Connexus Energy	14601 Ramsey Boulevard  Ransey, MN 55303	Electronic Service	No	OFF_SL_14-369_M-14-369
Kristin	Stastny	stastny.kristin@dorsey.com	Dorsey & Whitney LLP	50 South 6th Street Suite 1500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-369_M-14-369
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Gregory	Walters	gjwalters@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	3460 Technology Dr. NW  Rochester, MN 55901	Electronic Service	No	OFF_SL_14-369_M-14-369

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George	Agriesti	gagriesti@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Julie Rae	Ambach	jambach@shakopeeutilities.com	Shakopee Public Utilities	255 Sarazin St  Shakopee, MN 55379	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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Pat	Green	N/A	N Energy Dev	City Hall 401 E 21st St Hibbing, MN 55746	Paper Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Stephan	Gunn	sgunn@appliedenergygroup.com	Applied Energy Group	1941 Pike Ln  De Pere, WI 54115	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Tony	Hainault	anthony.hainault@co.henn epin.mn.us	Hennepin County DES	701 4th Ave S Ste 700  Minneapolis, MN 55415-1842	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Patty	Hanson	phanson@rpu.org	Rochester Public Utilities	4000 E River Rd NE  Rochester, MN 55906	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Norm	Harold	N/A	NKS Consulting	5591 E 180th St  Prior Lake, MN 55372	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jared	Hendricks	hendricksj@owatonnautiliti es.com	Owatonna Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Holly	Hinman	holly.r.hinman@xcelenergy .com	Xcel Energy	414 Nicollet Mall, 6th Floor  Minneapolis, MN 55401	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Karolanne	Hoffman	kmh@dairy.net.com	Dairyland Power Cooperative	PO Box 817  La Crosse, WI 54602-0817	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Randy	Hoffman	rhoffman@eastriver.coop	East River Electric Power Coop	121 SE 1st St PO Box 227 Madison, SD 57042	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Tom	Holt	tholt@eastriver.coop	East River Electric Power Coop., Inc.	PO Box 227  Madison, SD 57042	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Michael	Hoy	mhoy@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024-9583	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

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Anne	Hunt	anne.hunt@ci.stpaul.mn.us	City of Saint Paul	390 City Hall 15 West Kellogg Boulevard  Saint Paul, MN 55102	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Eric	Jensen	ejensen@iwla.org	Izaak Walton League of America	Suite 202 1619 Dayton Avenue St. Paul, MN 55104	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Joel	Johnson	joel@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N  Maple Grove, MN 55369	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Paula	Johnson	paulajohnson@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__CIP SPECIAL SERVICE LIST
Dave	Johnson	N/A	Community Action of Minneapolis	2104 Park Ave S  Minneapolis, MN 55404	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S  Virginia, MN 55792	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Larry	Johnston	lw.johnston@smmpa.org	SMMPA	500 1st Ave SW  Rochester, MN 55902-3303	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Deborah	Knoll	dknoll@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Tina	Koecher	tkoecher@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Kelly	Lady	kellyl@austinutilities.com	Austin Utilities	400 4th St NE  Austin, MN 55912	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST



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Martin	Lepak	N/A	Arrowhead Economic Opportunity	702 S 3rd Ave  Virginia, MN 55792	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Allan	Lian	alian@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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__CIP SPECIAL SERVICE LIST
Nick	Mark	nick.mark@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave  Minneapolis, MN 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company	4902 N Biltmore Ln PO Box 77007 Madison, WI 537071007	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
John	McWilliams	jmm@dairy.net	Dairyland Power Cooperative	3200 East Ave SPO Box 817  La Crosse, WI 54601-7227	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Brian	Meloy	brian.meloy@stinsonleonard.com	Stinson, Leonard, Street LLP	150 S 5th St Ste 2300  Minneapolis, MN 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

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Gary	Myers	garym@hpuc.com	Hibbing Public Utilities	1902 E 6th Ave  Hibbing, MN 55746	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Susan K	Nathan	snathan@appliedenergygroup.com	Applied Energy Group	2215 NE 107th Ter  Kansas City, MO 64155-8513	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560  Minneapolis, MN 55401	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Gary	Olson		Product Recovery, Inc.	2605 E Cliff Rd  Burnsville, MN 55337	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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__CIP SPECIAL SERVICE LIST
Audrey	Peer	audrey.peer@centerpointenergy.com	CenterPoint Energy	800 Lasalle Avenue - 14th Floor  Minneapolis, Minnesota 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Lisa	Pickard	lpickard@minnkota.com	Minnkota Power Cooperative	1822 Mill Rd PO Box 13200 Grand Forks, ND 582083200	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Bill	Poppert		Technology North	2433 Highwood Ave  St. Paul, MN 55119	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Cindy	Schweitzer Rott	cindy.schweitzer@clearesult.com	CLEARResult's	S12637A Merrilee Rd.  Spring Green, WI 53588	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Tom	Smilanich		Passive Concepts	228 6th Ave N  South St. Paul, MN 55075	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

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Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd  St. Paul, MN 55102	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Leo	Steidel	N/A	The Weidt Group	5800 Baker Rd  Minnetonka, MN 55345	Paper Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
John	Steinhoff		Resource Solutions, Inc.	318 Kensington Drive  Madison, WI 53704	Paper Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Richard	Szydlowski	rszydlowski@mncee.org	Center for Energy & Environment	212 3rd Ave N Ste 560  Minneapolis, MN 55401-1459	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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Lisa	Wilson	lisa.wilson@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2  Superior, WI 54880	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE  Cedar Rapids, IA 52401	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST