MINNESOTA DEPARTMENT OF COMMERCE

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October 28, 2016

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G011/M-16-651

Dear Dr. Wolf:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department or DOC) in the following matter:

> A Request by Minnesota Energy Resources Corporation (MERC or the Company) for Approval of a Change in Demand Entitlement for its Customers Served off of the Consolidated System Effective in the Purchased Gas Adjustment (PGA) on November 1, 2016.

The filing was submitted on August 1, 2016. The petitioner is:

> Amber S. Lee
> Minnesota Energy Resources Corporation
> 1995 Rahncliff Court, Suite 200
> Eagan, MN 55122

MERC did not anticipate all its purchases at the time of the filing. The actual capacity purchases or reductions on the Centra, Great Lakes, and Viking pipelines, will have a significant impact on the total entitlement and reserve margins; therefore, the Department provides the attached preliminary assessment of MERC's filing and will provide final recommendations after reviewing the Company's November 1, 2016 update.

The Department is available to answer any questions that the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ MICHAEL RYAN
Rates Analyst

/s/ SACHIN SHAH
Rates Analyst

MR/SS/lt
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET NO. G011/M-16-651

I. SUMMARY OF COMPANY'S PROPOSAL

Pursuant to Minnesota Rules 7825.2910, subpart 2, Minnesota Energy Resources Corporation (MERC or the Company) filed a change in demand entitlement petition (Petition) on August 1, 2016 for its customers served off of the Consolidated Purchased Gas Adjustment (PGA) system.[1] MERC-Consolidated serves customers located along three pipelines: Great Lakes Gas Transmission (Great Lakes or GLGT), Viking Gas Transmission Co. (Viking or VGT), and Centra Minnesota Pipelines (Centra). As shown in Table 1, MERC requested that the Minnesota Public Utilities Commission (Commission) approve the following changes in the Company's level of contracted capacity:[2]

Table 1: The Company's Proposed Total Entitlement Changes

Type of Entitlement	Proposed Changes: increase (decrease) (Dth)[3]
Great Lakes FT Western Zone (5 months)	(3,300)
Viking FT-A Zone 1-1 (5 months)	(1,000)
Total Entitlement Net Change	**(4,300)**

MERC's filing included decreases in capacity entitlement on both Great Lakes and Viking, which result in a negative reserve margin. In other words, the Company does not have enough natural gas pipeline capacity to cover a design day. To address the negative reserve margin, MERC stated that the plan is to contract for additional

[1] In its December 21, 2012 Order in Docket No. G007,011/GR-10-977, the Commission approved consolidation of MERC's four PGA systems effective July 1, 2013. MERC named the PGA for the Northern Natural Gas customers "MERC-NNG." At the time, MERC's only other PGA system was named "MERC-Consolidated." Effective May 1, 2015, MERC acquired Interstate Power & Light Company's Minnesota natural gas operations and customers. The Commission required MERC to maintain the transitioned customers on a separate PGA until MERC's next rate case. MERC named the PGA for the transitioned customers "MERC NNG-Albert Lea." On August 1, 2016, MERC filed a demand entitlement request for MERC-NNG in Docket No. G011/M-16-650 and MERC NNG-Albert Lea in Docket No. G011/M-16-652.

[2] MERC noted in its August cover letter that any updated information would be provided with the Company's November 1, 2016 filing.

[3] Dekatherms.

capacity to ensure a positive reserve margin between the date of the Petition, August 1st, and the updated filing on November 1, 2016. The Company anticipated that it will contract for approximately 5,000 Dth of pipeline capacity on Centra, Viking, and Great Lakes.[4]

MERC-Consolidated has gas storage with AECO, located in Calgary, Canada. To deliver the supply from storage to the MERC-Consolidated customers, MERC enters into a swap where MERC sells gas at the AECO storage point to a supplier and buys an equivalent volume at Emerson/Spruce, which MERC then transports to its customers. According to MERC, the swap substitutes the need to contract for firm transport on the TransCanada pipeline (TCPL) to transport the gas from AECO to Emerson/Spruce.[5] The AECO/Emerson Swap and AECO storage capacity volume remain the same as the prior year as indicated on MERC's Attachments 7 and 8.

The Petition indicated an increase to Union Balancing for 2016-2017. According to MERC's Attachment 8, the entitlement was anticipated to increase by 5,547 Dth /day at no cost to the Company. Based on the Department's follow-up conversations with the Company, the Petition reflects an error as to Union Balancing. The volume will not increase (*i.e.*, there will be no change to Union Balancing year-over-year).

Finally, MERC provided the information on financial instruments required by the Commission's May 28, 2015 Order in Docket No. G011/M-15-231.

Given that the Company plans to contract for additional pipeline capacity, the Department cannot gauge the reasonableness of the Company's requested entitlement for the 2016-17 winter season. The Department will provide a recommendation once the November 1, 2016 update is provided.

II. THE DEPARTMENT'S ANALYSIS OF THE COMPANY'S PROPOSAL

The Department's analysis of the Company's request includes the changes to:

- capacity;
- design-day requirements;
- reserve margins; and
- PGA cost recovery.

[4] Petition, page 14.
[5] *Id.*

A. MERC'S PROPOSED CHANGES

1. Capacity

As an initial matter, the Department confirms that, as required by the Commission's Order Point 9 of its April 28, 2016 Order in Docket Nos. G011/M-15-722, G011/M-15-723, and G011/M-15-724, MERC provided separate data on its summer and winter demand entitlements.[6]

As indicated in Table 2 below and DOC Attachments 1 and 2, MERC proposed to decrease its total entitlement level by 4,300 Dth as follows:

Table 2: MERC's Consolidated Total Entitlement Levels

August 1, 2016 Filing	2015-6 Entitlement (Dth)	2016-7 Entitlement (Dth)	Entitlement Changes (Dth)	Change From Previous Year (%)
Centra	9,100	9,100	0	0.00%
Great Lakes	29,758	26,458	(3,300)	(11.09)%
Viking	16,591	15,591	(1,000)	(6.03)%
Total Consolidated	55,449	51,149	(4,300)	(7.75)%

As discussed below, the design-day requirement increased by 2,453 Dth and exceeds MERC's contracted entitlement. MERC stated that the plan is to contract for additional capacity to ensure a positive reserve margin between the date of the Petition, August 1st, and the updated filing on November 1, 2016. Therefore, the Department concludes that MERC-Consolidated's proposed level of demand entitlement must be reviewed once the final contracts are known.

2. Design-Day Requirements

As provided in Table 3 below and DOC Attachment 2, MERC proposed to increase its total design day by 2,453 Dth as follows:

Table 3: MERC's Consolidated Design Day Levels

August 1, 2016 Filing	2015-6 Design Day (Dth)	2016-7 Design Day (Dth)	Design Day Changes (Dth)	Change From Previous Year (%)
Centra	8,674	9,132	458	5.28%
Great Lakes	28,543	29,808	1,265	4.43%
Viking	15,858	16,588	730	4.60%
Total Consolidated	53,075	55,528	2,453	4.62%

[6] See MERC Attachment 3.

MERC used a similar approach to what it used in last year's filing for its design-day analysis. As a result of MERC's telemetry program making it possible for all interruptible customers to have daily metered data, the Company no longer has to estimate their peak-day impact. Instead, MERC obtains the daily large volume transportation, interruptible and joint interruptible volumes by pipeline and weather station (Data A). In addition, MERC obtains the daily small volume interruptible volumes by pipeline and weather station (Data B). MERC calculates the daily firm volumes by subtracting both Data A and Data B from the total throughput volumes.

In its Petition, MERC indicated that it made some adjustments to its data (for example, for the GLGT pipeline, certain adjustments were made for the Bemidji and Cloquet regression analyses). MERC listed the steps followed in preparing the data for its design-day analysis, including:[7]

> Review daily total metered throughput, Data A, and Data B and identify missing or bad reads, and to the extent possible, fix missing or bad reads. To the extent that the data could not be fixed, we did not include it in our regressions.

The Department concludes that MERC's approach to its design-day analysis, as outlined on pages 3-12 of its Petition, appears reasonable.

The Commission's *April 28, 2016 Order* in Docket Nos. G011/M-15-722, G011/M-15-723, and G011/M-15-724, at Order point 12, stated the following:

> Required MERC to explain the reasons that its Demand Day requirements increased over its last 2014-2015 demand entitlements petition for its MERC-Consolidated (Centra Pipeline) and MERC-Albert Lea PGA in a compliance filing within 30 days of the order.

In its May 31, 2016 Compliance Filing in Docket Nos. G011/M-15-722, G011/M-15-723, and G011/M-15-724, at pages 4-5 the Company, in part, stated the following:

> MERC provides the following explanation for why its Demand Day requirements increased for MERC-Consolidated Centra Pipeline:
>
> In MERC's 2014-2015 demand entitlement petition, the small volume transportation, interruptible, and joint interruptible volumes by pipeline and by weather station was calculated by dividing the volumes consumed by a particular customer group during the highest historical peak month of usage for that customer group by twenty (20) to determine the Maximum Daily

[7] Petition at page 6.

> Quantity ("MDQ") for that customer group. In this case, 89,727 Dth in December 2013 divided by 20 for an MDQ of 4,486 Dth/day for Centra. In MERC's 2015-2016 demand entitlement petition, MERC ran two regressions. The first regression did not remove the small volume transportation, interruptible, and joint interruptible volumes by pipeline and by weather station. This regression resulted in design peak day estimate of 11,690 Dth/day. The second regression removed the small volume transportation, interruptible, and joint interruptible volumes by pipeline and by weather station. This regression resulted in a design peak day estimate of 8,788 Dth/day for Centra. Therefore, the difference between the two regressions could be used as an estimate of the small volume transportation, interruptible, and joint interruptible volumes by pipeline and by weather station. In this case, the difference equals an MDQ of 2,902 Dth/day.
>
> The decrease of 1,584 Dth/day from 2014-2015 to 2015-2016 (4,486 – 2,902 = 1,584) is the main reason why there was an increase in the design peak day estimate of 1,546 Dth/day. The remaining difference is due to two other factors: new data being used in our regressions from telemetry and new adjustments being made to our regressions due to an updated sales forecast.

The Department notes that the Company's detailed explanation above of the reasons for the increases in the design-day requirements from its previous petition is reasonable. Thus, the Department concludes that MERC complied with the Commission's *April 28, 2016 Order.*

The Department notes that MERC appropriately corrected its models for autocorrelation, as required by the Commission's February 4, 2015 Order in Docket Nos. G011/M-12-1192, G011/M-12-1193, G011/M-12-1194, and G011/M-12-1195 wherein the Commission required that, in its future demand entitlement filings, MERC check the regression models it ultimately uses for autocorrelation and correct the model if autocorrelation is present.

The Department recommends that the Commission accept MERC-Consolidated's peak-day analysis.

3. Reserve Margins

As shown in Table 4 below and DOC Attachment 2, the currently anticipated reserve margins for each area and the total MERC-Consolidated PGA are as follows:

Table 4: MERC's Consolidated Reserve Margin

August 1, 2016 Filing	Total Entitlement (Dth)	Design-day Estimate (Dth)	Difference (Dth)	2016 Reserve Margin %	2015 Reserve Margin %	Percentage Point Change From Previous Year
Centra	9,100	9,132	(32)	(0.35)%	4.91%	(5.26)%
Great Lakes	26,458	29,808	3,350	(11.24)%	4.26%	(15.50)%
Viking	15,591	16,588	(997)	(6.01)%	4.62%	(10.63)%
Total Consolidated	51,149	55,528	(4,379)	(7.89)%	4.47%	(12.36)%

The reserve margins listed in the table above are negative for all three pipelines. Negative reserve margins would put MERC's customers in danger of not receiving natural gas if any of the three consolidated pipelines experience a peak design day in the 2016-17 winter season. The Company has indicated that the plan is to contract for additional capacity to ensure a positive reserve margin before November 1, 2016 and to provide the information in an additional filing.

The Department requests that in the Company's November 1, 2016 updated filing, MERC provide its actual capacity purchases/reductions on the Centra, Great Lakes, and Viking pipelines.

The Department will provide a final recommendation regarding the MERC-Consolidated reserve margin after reviewing MERC's November 1, 2016 update.

B. THE COMPANY'S PGA COST RECOVERY PROPOSAL

In its Petition, the Company compared its July 2016 PGA to its projected November 2016 PGA rates to highlight the changes in demand costs (see DOC Attachment 3).[8] The Company's entitlement levels reflected in the Petition would result in the following annual demand cost impacts:

- Annual bill decrease of $6.25 related to demand costs, or approximately 9.67 percent, for the average General Service-Residential customer consuming 87 Dth annually;

- Annual bill decrease of $57.44 related to demand costs, or approximately 9.67 percent, for the average Large General Service customer consuming 800 Dth annually;

- no demand cost impacts related to MERC-Consolidated's interruptible rate classes.

[8] MERC has similar information in its Attachments 4 and 7 but the annual usage for all classes does not agree between the two attachments. Further, on Attachment 4, page 2, the new level of Viking demand is not shown. Thus, the demand rate is understated by $0.00003/Dth. DOC Attachment 3 corrects this error.

Please note the demand costs for November 2016 will increase when the Company adds the approximately 5,000 Dth of additional pipeline capacity to address the negative reserve margins.

III. THE DEPARTMENT'S RECOMMENDATIONS

The Department recommends that the Commission accept MERC's peak-day analysis.

Since MERC did not anticipate all its purchases at the time of the filing, the Department will provide its final recommendations after reviewing the Company's November 1, 2016 updated filing.

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Department Attachment 1
Docket No. G011/M-16-651
MERC Consolidated Demand Entitlement Historical and Current Proposal

		Historical Demand Entitlements			Proposed 8/1/16			
Great Lakes Gas Transmisssion	**Contract #**	2013-2014 Quantity (Mcf)	2014-2015 Quantity (Mcf)	2015-2016 Quantity (Mcf)	2016-2017 Quantity (Mcf)	Change in Quantity (Mcf)	Change in Capacity (%)	Change in Design Day (%)
FT Western Zone annual	FT0016	10,130	10,130	10,130	10,130	0		
FT Western Zone annual	FT15782	9,000	9,000	9,000	9,000	0		
FT Western Zone (12) annual	FT17891 (12)	3,600	3,600	3,600	3,600	0		
FT Western Zone (5) winter	FT17891 (5)	3,638	3,638	3,728	3,728	0		
FT Western Zone (5) winter	FTXXXXX (5)	0	0	3,300	0	(3,300)		
Total Great Lakes		**26,368**	**26,368**	**29,758**	**26,458**	**(3,300)**	**-11.09%**	**4.43%**
Viking Gas Transmission								
FT-A Zone 1 - 1 annual	AF0012	12,493	12,493	12,493	12,493	0		
FT-A Zone 1 - 1 winter	AF0209	1,098	1,098	1,098	1,098	0		
FT-A Zone 1 - 1 annual	AF0102	2,000	2,000	2,000	2,000	0		
FA-A Zone 1 - 1 annual	AFXXXX	1,500	0	1,000	0	(1,000)		
Total Viking		**17,091**	**15,591**	**16,591**	**15,591**	**(1,000)**	**-6.03%**	**4.60%**
Centra Transmission Holding/Centra Mn Pipelines								
Centra FT - 1 annual		9,500	9,500	9,100	9,100	0		
Total Centra		**9,500**	**9,500**	**9,100**	**9,100**	**0**	**0.00%**	**5.28%**
Total Entitlement		**52,959**	**51,459**	**55,449**	**51,149**	**(4,300)**	**-7.75%**	**4.62%**
Total Annual Transportation		**48,223**	**46,723**	**47,323**	**46,323**	**(1,000)**	**-2.11%**	
Total Winter Only Transport		**4,736**	**4,736**	**8,126**	**4,826**	**(3,300)**	**-40.61%**	
Percent of Winter Only Capacity		8.94%	9.20%	14.65%	9.44%			

Source: MERC's Attachments 3 & 7

Department Attachment 2
Docket No. G011/M-16-651
MERC Consolidated Demand Entitlement Analysis

	Number of Firm Customers			Design-Day Requirement			Total Entitlement Plus Peak Shaving			Reserve Margin	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
Heating Season	Number of Customers	Change from Previous Year	% Change From Previous Year	Design Day (Dth)	Change from Previous Year	% Change From Previous Year	Total Design-Day Capacity (Dth)	Change from Previous Year	% Change From Previous Year	Reserve (7) - (4)	% Reserve [(7)-(4)]/(4)
2016-2017	35,499	700	2.01%	55,528	2,453	4.62%	51,149	(4,300)	-7.75%	(4,379)	-7.89%
2015-2016	34,799	402	1.17%	53,075	4,369	8.97%	55,449	3,990	7.75%	2,374	4.47%
2014-2015	34,397	390	1.15%	48,706	(1,342)	-2.68%	51,459	(1,500)	-2.83%	2,753	5.65%
2013-2014	34,007	377	1.12%	50,048	(2,241)	-4.29%	52,959	(2,000)	-3.64%	2,911	5.82%
2012-2013	33,630			52,289			54,959				
Average			1.36%			1.66%			-1.62%		2.01%

	Firm Peak-Day Sendout			Per Customer Metrics			
	(12)	(13)	(14)	(15)	(16)	(17)	(18)
Heating Season	Firm Peak-Day Sendout (Dth)	Change from Previous Year	% Change From Previous Year	Excess per Customer [(7) - (4)]/(1)	Design Day per Customer (4)/(1)	Entitlement per Customer (7)/(1)	Peak-Day Send per Customer (12)/(1)
2016-2017	unknown			-0.1234	1.5642	1.4409	unknown
2015-2016	42,679	(3,072)	-6.71%	0.0682	1.5252	1.5934	1.2264
2014-2015	45,751	6,845	17.59%	0.0800	1.4160	1.4960	1.3301
2013-2014	38,906			0.0856	1.4717	1.5573	1.1441
Average			17.59%	0.0780	1.4710	1.5489	1.2371

Source: MERC's Attachment 1

Department Attachment 3
Docket No. G011/M-16-651
MERC Consolidated Rate Impacts

General Service-Residential	Base Cost of Gas Change G011/MR-15-748 1/1/16	Last Demand Change 11/1/2015	Most Recent PGA 7/1/2016	Proposed Demand Changes 11/1/2016	% Change From Last Base Cost of Gas Change	% Change From Last Demand Filing	% Change From Last PGA	$ Change From Last PGA
Commodity Cost	$3.8521	$3.1294	$3.1645	$3.0993	-19.54%	-0.96%	-2.06%	($0.0652)
Demand Cost	$0.7996	$0.8006	$0.7422	$0.6704	-16.16%	-16.26%	-9.67%	($0.0718)
Commodity Margin	$2.3980	$2.1806	$2.3980	$2.3980	0.00%	9.97%	0.00%	$0.0000
Total Cost of Gas	$7.0497	$6.1106	$6.3047	$6.1677	-12.51%	0.93%	-2.17%	($0.1370)
Average Annual Use	87	87	87	87				
Average Annual Cost of Gas*	$613.32	$531.62	$548.51	$536.59	-12.51%	0.93%	-2.17%	($11.92)

Large General Service	Base Cost of Gas Change G011/MR-15-748 1/1/16	Last Demand Change 11/1/2015	Most Recent PGA 7/1/2016	Proposed Demand Changes 11/1/2016	% Change From Last Base Cost of Gas Change	% Change From Last Demand Filing	% Change From Last PGA	$ Change From Last PGA
Commodity Cost	$3.8521	$3.1294	$3.1645	$3.0993	-19.54%	-0.96%	-2.06%	($0.0652)
Demand Cost	$0.7996	$0.8006	$0.7422	$0.6704	-16.16%	-16.26%	-9.67%	($0.0718)
Commodity Margin	$1.8232	$1.6579	$1.8232	$1.8232	0.00%	9.97%	0.00%	$0.0000
Total Cost of Gas	$6.4749	$5.5879	$5.7299	$5.5929	-13.62%	0.09%	-2.39%	($0.1370)
Average Annual Use	800	800	800	800				
Average Annual Cost of Gas*	$5,179.92	$4,470.32	$4,583.92	$4,474.32	-13.62%	0.09%	-2.39%	($109.60)

SV Interruptible Service	Base Cost of Gas Change G011/MR-15-748 1/1/16	Last Demand Change 11/1/2015	Most Recent PGA 7/1/2016	Proposed Demand Changes 11/1/2016	% Change From Last Base Cost of Gas Change	% Change From Last Demand Filing	% Change From Last PGA	$ Change From Last PGA
Commodity Cost	$3.8521	$3.1294	$3.1645	$3.0993	-19.54%	-0.96%	-2.06%	($0.0652)
Commodity Margin	$0.9336	$0.8490	$0.9336	$0.9336	0.00%	9.96%	0.00%	$0.0000
Total Cost of Gas	$4.7857	$3.9784	$4.0981	$4.0329	-15.73%	1.37%	-1.59%	($0.0652)
Average Annual Use	5,914	5,914	5,914	5,914				
Average Annual Cost of Gas*	$28,302.63	$23,528.26	$24,236.16	$23,850.57	-15.73%	1.37%	-1.59%	($385.59)

LV Interruptible Service	Base Cost of Gas Change G011/MR-15-748 1/1/16	Last Demand Change 11/1/2015	Most Recent PGA 7/1/2016	Proposed Demand Changes 11/1/2016	% Change From Last Base Cost of Gas Change	% Change From Last Demand Filing	% Change From Last PGA	$ Change From Last PGA
Commodity Cost	$3.8521	$3.1294	$3.1645	$3.0993	-19.54%	-0.96%	-2.06%	($0.0652)
Commodity Margin	$0.5007	$0.4553	$0.5007	$0.5007	0.00%	9.97%	0.00%	$0.0000
Total Cost of Gas	$4.3528	$3.5847	$3.6652	$3.6000	-17.29%	0.43%	-1.78%	($0.0652)
Average Annual Use	70,770	70,770	70,770	70,770				
Average Annual Cost of Gas*	$308,047.66	$253,689.22	$259,386.20	$254,772.00	-17.29%	0.43%	-1.78%	($4,614.20)

Change Summary	Commodity Change $/Mcf	Demand Change $/Mcf	Total Monthly Change $/Mcf	Total Monthly Change %	Average Annual Change
General Service	($0.0652)	($0.0718)	($0.1370)	-2.17%	($11.92)
Large General Service	($0.0652)	($0.0718)	($0.1370)	-2.39%	($109.60)
SV Interruptible Service	($0.0652)	$0.0000	($0.0652)	-1.59%	($385.59)
LV Interruptible Service	($0.0652)	$0.0000	($0.0652)	-1.78%	($4,614.20)

* Average Annual Bill amount does not include customer charges.

Prepared by the Minnesota Department of Commerce

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
Comments

Docket No. G011/M-16-651

Dated this 28th day of October 2016

/s/Sharon Ferguson

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