

July 13, 2015

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

RE: **Response Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E015/M-15-80

Dear Mr. Wolf:

Attached are the Response Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Minnesota Power's Conservation Improvement Program Consolidated Filing (*Petition*).

The *Petition* was filed on April 1, 2015 by:

Tina S. Koecher
Manager, Customer Solutions
Minnesota Power
30 West Superior Street
Duluth, MN 55802

The Department recommends approval of the *Petition* with conditions. The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ JOHN KUNDERT
Financial Analyst

JK/lt
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET No. E015/M-15-80

I. SUMMARY OF THE UTILITY'S PROPOSAL

On April 1, 2015, Minnesota Power (MP or the Company) submitted its annual Conservation Improvement Program (CIP) report (*Report* or *Petition*) for 2014 with the Minnesota Public Utilities Commission (Commission) in Docket No. E-015/M-15-80. The *Petition* contains the following sections:

- proposed recoveries and expenditures in the Company's CIP tracker account during 2014;
- proposed Conservation Program Adjustment (CPA) for 2015/2016, and;
- request for approval of a proposed Demand Side Management (DSM) financial incentive of \$6,237,702.

The Department filed its initial Comments on June 15, 2015. In our Comments, the Department recommended that the Commission:

- approve Minnesota Power's 2014 CIP Tracker Account Activity;
- approve an incentive of \$6,237,702 for Minnesota Power's 2014 CIP achievements; and
- grant MP a variance to Minn. Rules part 7820.3500 and 7825.2600 to permit the Company to continue combining the CPA with the Fuel Clause Adjustment on customer bills.

Minnesota Power agreed with these three Department recommendations in its Reply Comments filed on June 25, 2015.

The Department also requested in its comments that the Company provide some additional analyses in its Reply Comments regarding the impact of a carrying charge on the CIP tracker account set equal to the Company's short-term cost of debt from its most recent general

rate case as compared to the current carrying charge which is the Company's average weighted cost of capital (WACC) from its most recent general rate case. The Department also asked MP to provide an estimate of the CPA using a fiscal year (July through June) approach in lieu of its current calendar year approach. The Company provided both these analyses in its Reply Comments. The Department discusses the Company's analyses below.

II. DEPARTMENT ANALYSIS

A. CARRYING CHARGE COSTS

The results for the change in the carrying charge assuming a fiscal year approach were somewhat surprising; the forecasted total carrying charge for the twelve month period using the Company's WACC was (\$20,019) while the same estimate using Otter Tail Power Company's short-term cost of debt as a proxy was (\$18,085)¹.

While the (\$1,934) difference in the annual forecasted carrying charge appears to be *de minimus* in this instance, the lower cost for carrying charges is likely to reduce costs for ratepayers in other scenarios. Thus, the Department continues to recommend that the Commission require MP to use a carrying charge based on the Company's short-term cost of debt, just like the Commission has been approving for other investor-owned utilities.

Although Minnesota Power did not include short term debt in its capital structure in its most recent rate case, the Department notes that MP has a multi-year credit facility (Agreement) in place that serves as the vehicle for the Company to borrow funds on a short-term basis (*i.e.* the functional equivalent of the Company's short-term cost of debt). The Department recommends that Minnesota Power use the appropriate forecasted interest rate under this Agreement as its short-term cost of debt in its calculation of the carrying charge on the CIP Tracker Balance.

A. ESTIMATE OF THE CPA USING A FISCAL YEAR

DOC Table 1 below includes the information that Minnesota Power included in Table 2 of its Reply Comments concerning its estimated CPA using a fiscal rather than a calendar year.

¹ According to MP, its capital structure from its most recent general rate proceeding did not include any short-term debt, so it adopted the cost of debt from Otter Tail Power Company's most recent rate case as a proxy for this analysis.

DOC Table 1 – Re-creation of Table 2 from MP’s Reply Comments dated June 25, 2015

Description	Jan 2015 – Jun 2015	Jul 2015 – Jun 2016
CIP Tracker Account Balance at the end of the prior period	(\$1,116,332)	(\$5,831,076)
Financial Incentive for 2014		\$6,237,702
CIP expenditures for the forecast period	\$3,572,710	\$7,226,530
CIP cost recovery through base rates for the forecasted period	(\$2,433,568)	(\$4,821,805)
CIP cost recovery through the current CPA	(\$5,746,636)	\$0
Carrying Charges	(\$107,249)	To Be Determined
Recoverable Tracker Balance	(\$5,831,076)	\$2,811,351
kWh sales subject to CIP	1,677,849,875	3,288,036,510
Proposed CPA/kWh (approximate)		\$0.000855

The Department appreciates MP’s inclusion of this analysis in its Reply Comments. The Department believes that this approach to calculating the Company’s CPA is preferable to its current approach because it uses a mid-year CIP tracker balance instead of the prior-year end balance as a starting point. This should provide the Commission with an additional three months of actuals of CIP cost recovery (January through March) and thus the estimate of the CIP tracker balance at the time the new CPA will become effective should be more accurate.

One potential issue with MP’s approach, however, is that it does not adjust the CPA to recognize the likelihood of MP being awarded a shared savings DSM financial incentive for its CIP achievements. MP has generally booked its shared savings incentives in the latter half of the calendar year for the previous year’s results. One could argue that it is appropriate to include an adjustment of this type given the “matching principal” for revenues and expenses often cited by accountants.

DOC Table 2 below includes this adjustment and calculates a CPA using an adjusted Recoverable Tracker Balance for the July 2015 through June 2016 timeframe.

DOC Table 2 – CPA Adjusted to Account for Recovery of 100% of Forecasted 2015 CIP Incentive

Description	Jan 2015 – Jun 2015	Jul 2015 – Jun 2016
CIP Tracker Account Balance at the end of the prior period	(\$1,116,332)	(\$5,831,076)
Financial Incentive for 2014		\$6,237,702
CIP expenditures for the forecast period	\$3,572,710	\$7,226,530
CIP cost recovery through base rates for the forecasted period	(\$2,433,568)	(\$4,821,805)
CIP cost recovery through the current CPA	(\$5,746,636)	\$0
Adjustment for Forecasted 2015 CIP Incentive (100%)		\$3,377,991
Carrying Charges	(\$107,249)	To Be Determined
Recoverable Tracker Balance	(\$5,831,076)	\$6,189,342
kWh sales subject to CIP	1,677,849,875	3,288,036,510
Proposed CPA/kWh (approximate)		\$0.001882

To further assess the reasonableness of including a forecasted CIP incentive in the calculation of the fiscal-year CPA, the Department compared past forecasted incentive values with the incentives actually awarded to assess the risk of eroding the accuracy of the forecasted tracker balance.

DOC Table 3 summarizes the Company's forecasted and approved CIP incentives from 2010 through 2014. The Company's approved incentive for that five year period was 57 percent higher than the forecasted incentive on average. This historical information would suggest that an adjustment equal to the Company's forecasted incentive would be a conservative adjustment.

DOC Table 3 – Comparison of Forecasted to Actual CIP Incentives – 2010 through 2014

Year	Forecasted Incentive	Incentive Approved	Nominal Difference	Percentage Difference
2010	\$4,505,583	\$6,806,612	\$2,301,029	51%
2011	\$4,909,125	\$7,772,785	\$2,863,660	58%
2012	\$5,035,007	\$7,105,410	\$2,070,403	41%
2013	\$5,507,355	\$8,733,448	\$3,226,093	59%
2014	\$3,380,424	\$6,237,702	\$2,857,278	84%
Total	\$23,337,494	\$36,655,957	\$13,318,463	
Average	\$4,667,499	\$7,331,191	\$2,663,592	57%

Consequently, the Department recommends that the Commission require MP to develop its 2015-2016 CPA using a fiscal year approach and to use the method delineated in DOC Table 2 for the CPA that would be effective in the latter half of 2015 and the first half of 2016.

B. RESIDENTIAL BILL IMPACTS

DOC Table 4 compares the current and proposed CPAs that have been developed to date in this docket and their incremental impact on a residential customer's bill.

DOC Table 4 – Comparison of Current and Proposed CPAs – July 2015 to June 2016

Description	Current	Petition	Reply	Response – 100% of Forecasted Incentive
CPA \$/kWh	\$0.003425	\$0.002334	\$0.000855	\$0.001880
% Change	NA	(32%)	(75%)	(45%)
Bill Impact \$/Mon	\$2.57	\$1.75	\$0.64	\$1.41
Residential Nominal Incremental Bill Impact \$/Mon	NA	(\$0.82)	(\$1.93)	(\$1.16)
Residential Incremental Bill Impact (%)*	NA	(1.04%)	(2.44%)	(1.47%)

* Assumes average residential bill is \$79.00/month.

The incremental effect of the Department's recommended approach on residential customer bills is a decrease of 1.47 percent or \$1.16/month.

III. THE DEPARTMENT'S RECOMMENDATIONS

Based on the analysis provided in our June 15, 2015 comments and our analysis above, the Department recommends the Commission:

1. approve Minnesota Power's 2014 CIP tracker account, as summarized in Table 1 of the Department's Corrected Comments filed July 8, 2015;
2. approve a Shared Savings DSM financial incentive of \$6,237,702 for Minnesota Power's 2014 CIP achievements;
3. require Minnesota Power to calculate the carrying charge on its CIP tracker account using the appropriate forecasted interest rate under its multi-year credit facility as its short-term cost of debt;
4. grant Minnesota Power a variance to Minnesota Rules part 7820.3500 (K) and a variance to Minnesota Rules part 7825.2600 for one year after the issue date of the Commission's *Order* in the present docket;

5. require Minnesota Power to calculate its CPA using the information included in DOC Table 2 of these comments as a basis for the time period July 2015 through June 2016 and to divide that estimated recoverable tracker balance by the appropriate CIP-eligible kilo-watt hour sales for the time period during which the 2015-2016 CPA would remain effective; and
6. require Minnesota Power to submit a compliance filing, within 10 days of the issue date of the Order in the present docket, with revised tariff sheets reflecting the Commission's determinations in this matter.

/lt

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
Response Comments**

Docket No. E015/M-15-80

Dated this 13th day of July 2015

/s/Sharon Ferguson

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