



Minnesota Energy Resources Corporation
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January 13, 2020

VIA ELECTRONIC FILING

Ryan Barlow
Acting Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101

Re: Reply Comments of Minnesota Energy Resources Corporation

In the Matter Minnesota Energy Resources Corporation's Petition for Approval of a Change in Demand Entitlement for its Consolidated System, Docket No. G011/M-19-497

In the Matter Minnesota Energy Resources Corporation's Petition for Approval of a Change in Demand Entitlement for its NNG System, Docket No. G011/M-19-496

Dear Mr. Barlow:

On January 3, 2020, the Department of Commerce, Division of Energy Resources (the "Department") filed Comments in the above-referenced dockets recommending that the Minnesota Public Utilities Commission (the "Commission"):

- Accept Minnesota Energy Resources Corporation's ("MERC's") proposed level of demand entitlement for the Northern Natural Gas ("NNG") purchased gas adjustment ("PGA") area;
- Allow MERC to recover associated demand costs for the NNG PGA area through the monthly PGA effective November 1, 2019; and
- Approve recovery of MERC's demand costs for the Consolidated PGA through the monthly PGA effective November 1, 2019.

With respect to MERC's Consolidated PGA area, the Department requested that MERC provide reply comments addressing the negative reserve margin for its Viking Gas Transmission ("VGT") pipeline and in particular, discuss whether the Company believes procurement of additional capacity is necessary and whether short-term capacity options are available on the VGT system in the event that consumption may exceed total procured capacity.

MERC thanks the Department for its thorough review and provides the following Reply Comments in response to the Department's request for additional information with respect to the VGT reserve margin.

The Department correctly points out that MERC has a negative reserve margin on VGT. The following table provides the capacity, design day forecast, and reserve margin specifically for VGT.

	Capacity (dth) 2019-2020 Heating Season	Design Day (dth) 2019-2020 Heating Season	Reserve Margin
VGT	17,091	17,293	-1.17%

MERC has 202 dth/day less capacity than the forecast design day for the load served by VGT in the 2019-2020 heating season (-1.17% reserve margin). Due to the small volume of this shortfall, along with uncertainty about future rate structure as VGT goes through a rate case, MERC has determined that the most appropriate course of action is to use delivered gas supply to meet this need during the 2019-2020 heating season. If design day weather is forecast, MERC will be able to proactively purchase delivered supply at one or more of its VGT points to ensure it is able to meet its peak day requirements. The use of delivered supply in instances such as this provides a high level of flexibility for MERC, without the long term obligation of a transport contract. The purchase of delivered supply, if necessary, will not impact MERC's contracted demand entitlements but will ensure MERC is able to meet its peak day requirements.

Prior to the 2020-2021 heating season, the VGT rate case will be concluded. MERC will pursue either a term purchase of delivered natural gas or additional pipeline transport capacity for the 2020-2021 heating season to provide additional certainty of supply.

MERC requests that the Commission accept the proposed level of demand entitlements for MERC-NNG and MERC-Consolidated and allow MERC to recover associated costs through the monthly PGA effective November 1, 2019.

Please contact me at (414) 221-4208 if you have any questions regarding the information in this filing. Thank you for your attention to this matter.

Sincerely yours,

/s/Joylyn Hoffman Malueg
Joylyn Hoffman Malueg
Project Specialist 3
Minnesota Energy Resources Corporation

cc: Service Lists

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CERTIFICATE OF SERVICE

I, Kristin M. Stastny, hereby certify that on the 13th day of January, 2020, 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 lists.

Dated this 13th day of January, 2020.

/s/ Kristin M. Stastny
Kristin M. Stastny

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