



Minnesota Energy Resources

An Integrys Energy Group Company

1995 Rahnclyff Court, Suite 200

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www.minnesotaenergyresources.com

July 9, 2015

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

RE: Petition for Approval of Minnesota Energy Resources (MERC) 2014 CIP Tracker Account, DSM Financial Incentive, and Conservation Cost Recovery Adjustment (CCRA), Docket No. G-011/M-15-420

MERC Reply Comments

Dear Mr. Wolf:

On June 29, 2015, the Department of Commerce, Division of Energy Resources ("Department") filed Comments recommending that the Minnesota Public Utilities Commission ("Commission") approve Minnesota Energy Resources Corporation's ("MERC") Petition for Approval of 2013 Conservation Improvement Program Tracker Account, Demand Side Management Financial Incentive, and revised Conservation Cost Recovery Adjustment ("Petition"), with modification. Specifically, the Department recommended that the Commission:

- 1) Approve MERC's 2014 DSM financial incentive of \$2,093,158 to be included in the Company's CIP tracker account no sooner than the issue date of the Commission's Order;
- 2) Approve MERC's 2014 CIP tracker account activities as summarized in the Department's Comments;
- 3) Approve the revised gas CCRA of \$0.00865 per therm for all of MERC's Minnesota customer classes, to be effective January 1, 2016, or on the first billing cycle in the next full month after Commission approval, whichever is later. The approval is conditioned on the Company submitting, within 10 days of the issue date of the Order, a compliance filing with the relevant tariff sheets and necessary calculations that comply with the Commission's determinations
- 4) Require MERC to include the following bill message (with the appropriate date) following the date of the Order, or January 1, 2016, whichever is later:



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Effective [insert date], a CCRA (conservation cost recovery adjustment) has been included on your bill. The CCRA is an annual adjustment to true-up under-recovery or over-recovery of CIP (conservation improvement program) expenses. Effective [insert date], the CCRA rate will be \$0.000865 per therm.

- 5) Require MERC to correct its method for calculating carrying charges going forward. Specifically, the Department indicated that MERC had been incorrectly calculating carrying charges because the Company did not base its carrying charges on the monthly tracker balance, but instead based them on the tracker balance minus past carrying charges.

MERC would like to thank the Department for its review in this matter. MERC is in agreement with the Department's recommendations, including the Department's recommended adjustment to MERC's revised CCRA factor and recommendation that MERC revise its methodology for calculating carrying charges going forward.

Please contact me at (651) 322-8965 if you have any questions.

Sincerely,

/s/ Amber S. Lee_____

Amber S. Lee
Regulatory and Legislative Affairs Manager
Minnesota Energy Resources Corporation

cc: Service Lists

AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)
) ss
COUNTY OF HENNEPIN)

Kristin M. Stastny hereby certifies that on the 9th day of July, 2015, on behalf of Minnesota Energy Resources Corporation (MERC) she electronically filed a true and correct copy of the attached 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.

/s/ Kristin M. Stastny
Kristin M. Stastny

Subscribed and sworn to before me
This 9th Day of July, 2015.

/s/ Alice Jaworski
Notary Public, State of Minnesota

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