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August 19, 2009

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Response Comments of the Minnesota Office of Energy Security**
Docket No. G011/M-08-1330 and G007,011/MR-08-836

Dear Dr. Haar:

On March 30, 2009, Minnesota Energy Resources Corporation-PNG (MERC-PNG or the Company) submitted its *Reply Comments* in response to the Minnesota Office of Energy Security's (OES) March 4, 2009 *Comments* related to MERC-PNG's Great Lakes Gas Transmission, L.P. (Great Lakes) Purchased Gas Adjustment (PGA) system demand entitlement filing. Based on its review, the OES concludes that a response to MERC-PNG's *Reply Comments* is necessary to establish a complete record in this matter. As such, the OES requests that the Minnesota Public Utilities Commission (Commission) accept these *Response Comments* to MERC-PNG's Great Lakes PGA system *Reply Comments*.

Based on its review of MERC-PNG's *Reply Comments*, the OES recommends that the Commission:

- **approve** the Great Lakes PGA system demand entitlement level without endorsing its design-day study analysis, subject to the Commission's pending decisions regarding the Contracted Demand (CD) units in Docket No. G011/M-07-1404;

- **approve** the PGA recovery of costs associated with the Company's proposed demand entitlement level effective November 1, 2008, subject to the Commission's pending decisions regarding the CD units in Docket No. G011/M-07-1404;

- **require** MERC-PNG to provide additional evidence supporting the estimative power of its design-day study in its next demand entitlement filing;

- **require** MERC-PNG to provide in its future demand entitlement filings the individual PGA system specific number of joint customers (sales versus transportation) who elect to take firm service, and identify the associated interstate pipeline contracts and units of contracted demand from the Company for each month during the intervening twelve month period between filings;

- **require** MERC-PNG to remove all costs and volumes related to the FT0011 contract from its latest update, and any other future updates, to the base cost of gas dated January 27, 2009, and to submit the revised base cost of gas calculation as part of its rate case compliance filing.

The OES is available to answer any questions the Commission may have.

Sincerely,

/s/ SACHIN SHAH
Rates Analyst

SS/ja
Attachment

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BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

RESPONSE COMMENTS OF THE
MINNESOTA OFFICE OF ENERGY SECURITY

DOCKET NO. G011/M-08-1330 AND G007,011/MR-08-836

I. BACKGROUND

The following rounds of comments have been submitted to the Minnesota Public Utilities Commission (Commission) in Minnesota Energy Resources Corporation-PNG's (MERC, MERC-PNG or the Company) Great Lakes Gas Transmission, L.P. (Great Lakes) Purchased Gas Adjustment (PGA) system 2008-2009 demand entitlement filing:

- November 3, 2008, MERC-PNG's initial *Petition*;
- November 5, 2008, MERC-PNG's *Supplement*;
- March 4, 2009, Minnesota Office of Energy Security's (OES) *Comments*;
- March 30, 2009, MERC-PNG's *Reply Comments*;
- August 12, 2009, MERC-PNG's *Replacement Attachments;* and
- August 19, 2009, OES's *Response Comments*.

In its March 30, 2009 *Reply Comments*, MERC-PNG provided additional information and responded to concerns raised by the OES in its March 4, 2009 *Comments*. The OES requested additional information to allow the OES to assess the reasonableness of MERC-PNG's proposal.

On August 12, 2009, the Company submitted a complete Attachment 4 that replaces the original attachment filed in the Company's initial *Petition* and also provides information that was inadvertently excluded from MERC-PNG's November 5, 2008 *Supplement*. The Company states that it recently realized that when MERC-PNG had submitted the revised attachments in its November 5, 2008 *Supplement* (that included revisions to MERC-PNG's Attachment 4, page 1 of 2, and Attachment 7), the Company failed to submit revised Attachment 4, page 2 of 2, that included actual (rather than estimated) costs. The OES notes that the actual demand costs submitted on August 12, 2009 match the actual demand costs submitted in MERC-PNG's

November 5, 2008 *Supplement* and as a result will not affect the OES's analysis regarding the Purchased Gas Adjustment (PGA) recovery proposal and OES Attachments 3 and 4 submitted in the OES's March 4, 2009 *Comments*.

The OES discusses the Company's responses below.

II. THE OES'S RESPONSE TO MERC-PNG'S MARCH 30, 2009 *REPLY COMMENTS*

A. MERC'S EXPLANATION OF ITS DESIGN-DAY RESULTS FOR ITS PGA SYSTEM AND THE COMPANY'S CALCULATION OF ITS 2007-2008 HEATING SEASON DESIGN-DAY REQUIREMENT USING ITS CURRENT DESIGN-DAY METHODOLOGY

In its March 4, 2009 *Comments*, the OES recommended that MERC provide an explanation of why its current design-day analysis showed an increase in design-day volumes for its Minnesota Energy Resources Corporation - Northern Minnesota Utilities (MERC-NMU), MERC-PNG Northern Natural Gas (Northern), and MERC-PNG Great Lakes PGA systems and a decrease in design-day volumes for its MERC-PNG Viking Gas Transmission Co., (Viking) PGA system. In addition, the OES also recommended that MERC-PNG re-calculate its design-day requirement for the 2007-2008 heating season using its current design-day methodology.

In its *Reply Comments*, MERC-PNG states that when examining its new design-day methodology it is important to look at the total number of values estimated by its regression analysis and not just its firm throughput estimates. In support of this statement, the Company used its current design-day methodology to estimate total system throughput for the 2007-2008 heating season. When using its current methodology for the 2007-2008 heating season, MERC-PNG was able to produce total throughput estimates that are comparable to the same estimates for the 2008-2009 heating season.[1] MERC-PNG then explains that the difference between its old design-day methodology and its current methodology is the Company's treatment of transport and interruptible sales volumes.

However, in an effort to respond to the OES's original questions, MERC-PNG states that the necessary data to estimate previous design-days with its current design-day analysis is unavailable and, as such, the Company is unable to address why there were significant differences in the design-day changes between PGA systems and fully compare the design-day estimates for both heating seasons. MERC-PNG produces a design-day estimate for the 2007-2008 heating season using its current design-day methodology; however, given the data issues expressed by the Company, there is not complete support in this docket for the Company's analysis. Ideally, MERC-PNG should initiate a new design-day methodology when the Company has the ability to test the new approach against previous results and weather conditions. Given

1 These results are presented in the table at the top of page 2 in MERC-PNG's March 30, 2009 Reply Comments.

the large changes in design-day estimates, the OES is concerned that firm system performance may be hindered on a peak-day. However, the OES notes, as discussed both in our original *Comments* in this docket, and below, that:

1. MERC-PNG's new method appears to have merit in terms of providing a more realistic estimate of use by interruptible customers on peak days;
2. MERC-PNG's system appeared to perform adequately in the past year; and
3. OES agrees with MERC-PNG that it would be helpful to continue to talk about the Company's method, as discussed further below.

B. OES'S REQUEST FOR INFORMATION RELATED TO MERC-PNG'S CONTRACT DEMAND (CD) UNITS

In its March 4, 2009 *Comments*, the OES recommended that MERC-PNG identify separately, by service and interstate pipeline contracts, the amount of CD units included in the proposed design-day and peak-day entitlement levels along with the previous entitlement levels as shown in OES Attachments 1 and 2.

In its *Reply Comments,* MERC-PNG states that it does not separately contract for contracted demand by service or interstate pipeline contract. MERC-PNG then refers to its rate case testimony filed on the issue of CD units in Docket No. G007,011/GR-08-835 (08-835 Docket). In the 08-835 Docket, the Company states that although MERC-PNG includes CD volumes in its firm volumes to calculate the peak-day requirements, the Company does not separately plan for firm CD capacity in its purchase of firm pipeline capacity. In its *Reply Comments*, MERC-PNG states that the specific period of time for which a joint customer takes contracted firm service from the Company can vary based on the initial contracted term or the cancellation of a contract upon 90 days notice. MERC-PNG further states that because of this variability of firm contracted demand by joint customers, the Company does not purchase firm pipeline capacity specifically to serve the contracted demand capacity of joint rate customers; nor does the Company allocate a specific amount of firm capacity to meet CD volumes. The Company concludes that because of the historically small volume of firm CD capacity, MERC-PNG serves firm contracted demand needs out of its reserve margin. As stated in the March 4, 2009 OES *Comments*, the issue of CD units is currently pending before the Commission in Docket No. G011/M-07-1404.

C. OES'S REQUEST FOR INFORMATION RELATED TO WHETHER THE COMPANY HAD SUFFICIENT CAPACITY AVAILABLE FOR FIRM CUSTOMERS DURING THE COLD SPELLS EXPERIENCED IN DECEMBER 2008 AND JANUARY 2009

In its March 4, 2009 *Comments*, the OES noted that MERC-PNG's Great Lakes service territory had no peak shaving ability or available storage, and, as such, the OES recommended that the Company provide information on whether the Company had sufficient capacity available for firm customers during the cold spells experienced in December 2008 and January 2009. In response, MERC-PNG provided the requested information and included a discussion of its system performance during the cold spell from January 12, through 16, 2009. In its *Reply Comments*, the Company states that during the coldest weather experienced during 2009, MERC-PNG had adequate nominated capacity to meet system requirements and that at no point during the heating season did the Company have to fully use its firm entitlement capacity.

Based on its review of the Company's table filed on March 30, 2009, the OES notes that while examining the peak-day data provided in the table, on several occasions during January 2009 it appears that the Company's total system nominations may not have been sufficient to meet total system usage. The Company states that the reason nominated capacity to meet total system requirements was less than actual usage was due to working off a long imbalance, which means there was more gas nominated by MERC-PNG and third party(s) than had been previously consumed, and Great Lakes, an interstate natural gas pipeline company, requires MERC-PNG to work off this long imbalance.

Because this data contains both firm and interruptible customer information, it is not possible to determine whether there were any difficulties serving firm customers. However, the OES notes that MERC-PNG states on page 4 of its *Reply Comments* that "MERC did not fully utilize all of its firm capacity on any of the days." Further, third-party nominated volumes make up a significant amount of total nominated volumes, which suggests that interruptible load was available on the system at levels which, had there been a need for interruptions for reliability reasons, would have prevented any need to interrupt firm customers. Thus, it appears that the Company has sufficient firm demand volumes in the 2008-2009 heating season to meet the needs of its firm customers.

The OES notes, however, that the Company used significantly more natural gas than anticipated on days during the past heating season that had temperatures warmer than the Commission's peak-day standard. The OES is also concerned that the Company did not provide usage data that was specific to each of its PGA systems. Without these PGA system specific data, or at the minimum estimates, the OES is unable to determine whether MERC-PNG's Great Lakes PGA system would have adequate firm entitlements on a Commission prescribed peak-day.

In MERC-PNG's companion docket for MERC-PNG's Northern PGA system, Docket No.G011/M-08-1328, the Company was able to offer several options to serve firm load, if needed next heating season. However, it is not clear whether such options would be available to serve MERC-PNG's Great Lakes PGA system firm customers. The OES recommends that the Company be prepared to indicate to the Commission whether these tools could be used to serve MERC-PNG's Great Lakes PGA system customers. Finally, the OES notes that MERC-PNG's change in its method to estimate peak use by interruptible customers implies that MERC-PNG would be able to make greater use of interruption, if needed, for reliability purposes for firm customers.

Based on the information in the table on page 4 of the Company's *Reply Comments,* and MERC-PNG's inability to fully compare its design-day estimates against previous heating seasons as discussed in Section II, Subsection A, the OES now recommends that the Commission approve

MERC-PNG's Great Lakes PGA system demand entitlement level without endorsing its design-day study analysis. Although the OES believes that MERC-PNG's current design-day methodology may have advantages over its previous estimation technique, the OES still has concerns about the design-day study's ability to estimate peak-day sendout and it recommends that the Commission require the Company to provide additional evidence supporting the estimative power of its design-day study in its next demand entitlement filing.

Further, to address concerns about MERC-PNG's ability to meet the needs of its firm customers on the Great Lakes system, the OES recommends that the Company be prepared to indicate to the Commission all of the tools that could be used to serve firm customers on MERC-PNG's Great Lakes PGA system.

D. OES REQUEST FOR INFORMATION AND RECONCILIATION RELATED TO MERC-PNG'S DAILY FIRM CAPACITY (DFC) CUSTOMER SELECTIONS

In its initial *Petition*, MERC-PNG stated that it used daily firm capacity (DFC) data from 59 customers in its firm peak-day calculations. In the 08-835 docket, in the Direct Testimony and Exhibits of Company Witness Gregory J. Walters, Exhibit GJW-1, Schedule 12, MERC-PNG showed approximately 24 joint sales customers in the test year and, as such, the OES recommended that MERC-PNG provide a reconciliation and explanation for the differences in the customer data in its *Reply Comments*. In its *Reply Comments*, MERC-PNG states that it believes the OES incorrectly interpreted Exhibit GJW-1, Schedule 12. The Company further states that Schedule 12 shows that there were six small volume joint (SJ-5) customers and four large volume joint (LJ-5) customers taking service off of the Great Lakes interstate pipeline, in addition to transportation customers that were not distinguished by pipeline at the time of MERC-PNG's rate case filing.

In its *Reply Comments*, MERC-PNG states that it currently has seven joint rate customers taking service off of the Great Lakes pipeline; six are small volume joint (SJ-5) customers and one is a large volume customer, and that it used the seven joint customers' data in the calculation of the firm peak-day estimates for MERC-PNG's Great Lakes PGA system. MERC-PNG also states that the number of sales versus transport customers is not static, as customers may move from sales to transportation service and vice versa. The Company further states that MERC-PNG did not use the 59 customers' DFC data as these are joint customers on the entire MERC system, including both MERC-PNG and MERC-NMU. In its July 8, 2008 *Response Comments* in Docket No. G011/M-07-1404 (07-1404 Docket), the Company stated the following:

> To insure that firm customers are not negatively impacted by the purchase of excessive amounts of contracted demand capacity, each request for contracted demand capacity is reviewed by the company prior to approval. The purchase of contracted demand capacity not only give the joint customer access to firm gas supply but it also gives the joint customer access to firm distribution system service. If the Company does not have the capability to

> provide the joint customer with both firm supply service and firm distribution service, then the request for firm contracted demand capacity would be denied.

MERC-PNG has previously explained that it does not secure firm volumes specifically for these joint-rate customers and that historically volumes associated with joint-rate customers have been so low that the capacity needed to serve these customers has come out of the reserve margin (which is calculated for all firm customers). While the 2008-2009 heating season is over, the OES recommends that the Commission require the Company to provide, in its future demand entitlement filings, the individual PGA system specific number of joint customers (sales versus transportation) who elect to take firm service, and identify the units of contracted demand from the Company for each month during the intervening twelve (12) month period between filings.

In the OES's March 4, 2009 *Comments*, the OES recommended withholding approval, pending further clarification by MERC-PNG, of the Great Lakes PGA system demand entitlement level, subject to the Commission's pending decisions regarding the CD units in Docket Nos. G011/M-07-1404 and G007,011/GR-08-835. The OES notes on June 29, 2009 that the Commission recently issued its *Findings of Fact, Conclusions of Law, and Order* in Docket No. G007,011/GR-08-835. At the time of these *Response Comments*, the Commission has not issued an *Order* in MERC-PNG's Viking PGA system 2007-2008 heating season demand entitlement filing, Docket No. G011/M-07-1404.

E. MERC-PNG'S FUTURE PGA AND DEMAND ENTITLEMENT FILINGS

In its March 4, 2009 *Comments*, the OES noted that MERC-PNG has been using the 2000 rate case volumes in its monthly PGA reports from at least September 2008 and prior periods.[2] In its *Comments*, the OES stated that it expected MERC-PNG, after the end of the general rate case in the 08-835 Docket, to comply with Minnesota Rules including Minnesota Rule 7825.2700, subpart 5, and Minnesota rule 7825.2400, subpart 3, in the Company's future PGA and demand entitlement filings. In response, MERC-PNG agreed to compute the demand adjustment using the test-year demand volumes for three years after the end of the Company's general rate case test year (*i.e.*, for 2009 through 2011). After that time MERC-PNG agreed to compute the demand adjustment on the basis of the annual demand volume as defined in Minnesota Rule 7825.2400, subpart 3, in its future PGA and demand entitlement filings.

[2] On May 11, 2001, the Commission issued its *Order Modifying and Accepting Settlement* (May 11, 2001 Order) in Aquila Networks-NMU's and Aquila Networks-PNG's general rate case in Docket No. G007,011/GR-00-951. In its June 1, 2006 *Order Approving Sale Subject to Conditions*, (Docket No. G007,011/PA-05-1676) the Commission approved Aquila Inc.'s (Aquila) sales of its two divisions operating in Minnesota, Aquila Networks-PNG and Aquila Networks-NMU to Minnesota Energy Resources Corporation (MERC), a subsidiary of WPS Resources Corporation. MERC has two divisions: MERC-PNG and MERC-NMU.

F. OES'S REQUEST FOR INFORMATION RELATED TO MERC-PNG'S PROPOSED CHANGES IN DEMAND TYPES

MERC-PNG indicated in its original *Petition* that it would increase the Company's pending total design-day capacity (total entitlement) by 500 Mcf/day. In the OES's March 4, 2009 *Comments*, the OES stated that the proposed increase in total entitlement was caused by an increase of 500 Mcf/day in the Company's FT8466 12-month service.

The Company did not provide detailed explanations in its filing to support the specific proposed demand changes; therefore, the OES recommended that MERC-PNG provide a detailed explanation for the change in entitlement levels in its *Reply Comments*. In response, MERC-PNG explained in greater detail how there was an increase in its FT8466 12-month capacity. As part of the Company's detailed explanation, MERC-PNG states that, based on its design day study using the one (1) in twenty (20) year occurrence, MERC-PNG's methodology resulted in a design day requirement of 10,299 Mcf/day. MERC-PNG had previously allocated 10,000 Mcf/day of the Great Lakes interstate pipeline capacity to meet the design day of 9,550 Mcf/day during the 2007-2008 heating season. However, based on MERC-PNG's methodology, the 2008-2009 heating season entitlement level of 10,299 Mcf/day, when compared to its previously allocated amount of 10,000 Mcf/day, would have resulted in a negative reserve margin if MERC-PNG had not proposed any changes. As a result, MERC-PNG increased the FT8466 capacity by 500 Mcf/day to meet the current design-day requirement resulting in a positive reserve margin of 1.95 percent. Based on the above detailed response, the OES appreciates MERC-PNG's clarification and, as a result, the OES does not have any further concerns related to MERC-PNG's proposed specific changes in entitlement levels.

G. MERC-PNG'S TREATMENT OF ITS FT0011 CONTRACT IN DOCKET NO. G007,011/MR-08-836 (BASE COST OF GAS FILING)

In its March 4, 2009 *Comments*, the OES noted that MERC-PNG had terminated its FT0011 contract and refunded any related costs to its ratepayers; however, based on an examination of the total volumes in the base cost of gas calculation, the OES observed that volumes (423 Mcf/day of capacity) related to this contract were included in the base cost of gas calculation. Given this observation, the OES recommended that the Commission require MERC, in its final compliance in Docket No. G007,011/MR-08-836, to remove all volumes related to the FT0011 contract from its final base cost of gas calculations.

In its *Reply Comments*, MERC-PNG explains that at the time it filed its initial base cost of gas filing, the OES and Company were in dispute over whether the volumes associated with the FT0011 contract were appropriate for recovery or not. However, after this initial filing was made, the Company agreed to discontinue recovery and refund these charges. MERC-PNG explains that it made additional filings in this docket and it acknowledges that these base cost of gas calculations include costs and volumes associated with the FT0011 contract.[3] Further, the Company states that the annual costs in the base cost of gas filing associated with the FT0011 contract account for approximately $30,500 of total annual gas costs for the Great Lakes PGA system. When this amount is compared to MERC-PNG's annual sales projection of 10,886,930 therms, it translates into a per therm cost of ($0.00280).

Therefore, the OES recommends that the Commission require, as proposed by MERC-PNG, to remove all costs and volumes related to the FT0011 contract from its latest update, and any future updates, to the base cost of gas dated January 27, 2009, and to submit the revised base cost of gas calculation as part of its rate case compliance filing.

H. OES'S REQUEST FOR INFORMATION RELATED TO MERC-PNG'S PROPOSED CHANGE IN NEXEN STORAGE EXCHANGE AGREEMENT

MERC-PNG indicated in its original *Petition* that it would decrease the Company's pending Nexen Exchange Agreement on its Great Lakes PGA system by 13,251 units. In the OES's March 4, 2009 *Comments*, the OES stated that the Nexen Storage Exchange agreement allows MERC-PNG to give gas to a third party during the summer at an agreed-upon delivery point and the gas is re-delivered by the same third party at an agreed-upon delivery point during the winter.

The Company did not provide detailed explanations in its filing to support the specific proposed demand changes to its portfolio of other services; therefore, the OES recommended that MERC-PNG provide a detailed explanation to its portfolio of other services in its *Reply Comments*. In response, MERC-PNG explained how the Company allocated the Nexen Exchange Agreement between MERC-PNG and MERC-NMU on the Great Lakes PGA system, the Viking PGA system, and Centra pipeline based upon normal winter requirements. Based on the above response, the OES appreciates MERC-PNG's clarification and, as a result, the OES does not have any further concerns related to MERC-PNG's proposed specific changes to its portfolio of other services.

I. OES'S REQUEST FOR INFORMATION RELATED TO MERC-PNG'S RESERVE MARGIN

In its March 4, 2009 *Comments*, the OES stated that MERC-PNG's Great Lakes PGA system does not have peak shaving or storage and that customers on this system may be more susceptible to service issues during a peak-day situation if the design-day estimates are incorrect. Additionally, in its March 4, 2009 *Comments*, the OES also stated that peak shaving and storage facilities provide additional natural gas supplies on peak days; for those systems that lack such facilities it may be appropriate to maintain larger reserve margins and that the OES would review MERC-PNG's *Reply Comments* for further information on this topic.

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3 MERC-PNG filed updated base cost of gas values on September 19, 2008; October 29, 2008; December 22, 2008; and January 27, 2009 in Docket No. G007,011/MR-08-836.

In its *Reply Comments,* MERC-PNG states that MERC believes that its reserve margin is appropriate, and it agrees to monitor this issue going forward and would value the opportunity to meet with the OES to discuss the peak day methodology. The OES agrees that such a meeting would likely be helpful. The OES notes that Commission Staff may wish to attend this meeting as well.

J. OES'S REQUEST FOR INFORMATION RELATED TO MERC-PNG'S SALES GROWTH RATE

In its initial *Petition*, MERC-PNG stated that it estimated sales growth in its current demand entitlement filing using a different technique than it had in previous demand entitlement filings. The Company did not provide the data necessary to replicate these growth rates and, as such, the OES recommended that MERC-PNG provide these growth rate data in its *Reply Comments*. In its *Reply Comments*, MERC-PNG provided this sales growth rate information, and the assumptions necessary to replicate its sales growth rates, and, after reviewing these data, the OES concludes that MERC-PNG's sales growth rate estimates are adequate.

III. OES RECOMMENDATIONS AND CONCLUSIONS

Based on its review of MERC-PNG's *Reply Comments*, the OES recommends that the Commission:

- approve MERC-PNG's Great Lakes PGA system demand entitlement level without endorsing its design-day study analysis subject to the Commission's decisions in the pending G007/M-07-1404 docket;
- approve the PGA recovery of costs associated with the Company's proposed demand entitlement level effective November 1, 2008, and subject to the Commission's pending decisions regarding the CD units in Docket No. G011/M-07-1404,
- require MERC-PNG to provide additional evidence supporting the estimative power of its design-day study in its next demand entitlement filing;
- require MERC-PNG to provide in its future demand entitlement filings the individual PGA system specific number of joint customers (sales versus transportation) who elect to take firm service, and identify the associated interstate pipeline contracts and units of contracted demand from the Company for each moth during the intervening 12-month period between filings; and
- require MERC-PNG to remove all costs and volumes related to the FT0011 contract from its latest update, and any other future updates, to the base cost of gas dated January 27, 2009, and to submit the revised base cost of gas calculation as part of its rate case compliance filing.

/ja

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, 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 Office of Energy Security
Reply Comments

Docket No. G011/M-08-1330 and G007,011/MR-08-836

Dated this **19th** day of **August**, **2009**

/s/Sharon Ferguson

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