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-16-652

Dear Mr. Wolf:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) 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 Northern Natural Gas-Albert Lea (NNG-ABL) 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

The Department requests that MERC provide additional information in reply comments or if possible in the November 1, 2016 update. The Department will offer additional comments and recommendations in subsequent response comments after it has reviewed the additional information.

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

MINNESOTA DEPARTMENT OF COMMERCE

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE MINNESOTA DEPARTMENT OF COMMERCE DIVISION OF ENERGY RESOURCES

DOCKET NO. G011/M-16-652

I. SUMMARY OF COMPANY'S PROPOSAL

Effective May 1, 2015, Minnesota Energy Resources Corporation (MERC or the Company) acquired Interstate Power & Light Company's (IPL) Minnesota natural gas operations and customers. The Minnesota Public Utilities Commission (Commission) required MERC to maintain the transitioned customers on a separate Purchased Gas Adjustment (PGA) until MERC's next rate case.[1] MERC named the PGA for the transitioned customers "Northern Natural Gas-Albert Lea" (NNG-ABL).

Pursuant to Minn. R. 7825.2910, subpart 2, MERC filed a change in demand (capacity) entitlement petition (Petition) on August 1, 2016 for its customers served off of the NNG-ABL PGA system.[2] In its Petition, MERC requested no changes in the level of contracted capacity.

Using a similar design-day calculation methodology as has been used in the past, MERC proposed to decrease its total design day by 2.06 percent.

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

The Minnesota Department of Commerce, Division of Energy Resources' (Department or DOC) analysis of the Company's request includes the:

- changes to capacity;
- design-day requirement;

[1] See the Commission's December 8, 2014 *Order Approving Sale Subject to Conditions* in Docket No. G-001, G011/PA-14-107.

[2] 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." On August 1, 2016, MERC filed a demand entitlement request for MERC-Consolidated in Docket No. G011/M-16-651 and MERC-NNG in Docket No. G011/M-16-650.

- reserve margin; and
- PGA cost recovery proposal.

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.[3]

As indicated in DOC Attachments 1 and 2, the Company proposed to keep its total entitlement level in Dth[4] the same as the prior year as follows:

Table 1: MERC's NNG-ABL Total Entitlement Levels

Filing	Previous Entitlement (Dth)	Proposed Entitlement (Dth)	Entitlement Changes (Dth)	Change From Previous Year (%)
August 1, 2016	14,190	14,190	0	0%

In addition to reviewing the proposed changes in demand, the Department also reviews other changes in non-capacity items in the demand change filings.[5] As in last year's filing, MERC was assigned 350,000 Dth[6] of Northern Natural Gas (NNG) Firm Deferred Delivery (FDD) storage and related reservation of 6,071 Dth from IPL. MERC also took assignment of 1,700 Dth of NNG's System Management Service (SMS) which provides additional tolerances for shippers, beyond the allowed five-percent tolerance.[7] MERC's proposed level of demand entitlement appears reasonable, but the Department will provide final recommendations after reviewing the Company's November 1, 2016 update.

2. Design-Day Requirement

Table 2 and DOC Attachment 2 present MERC's proposed design day levels in Dth as filed on August, 1 2016 as follows:

[3] See MERC Attachment 3.
[4] Dekatherms
[5] Minnesota Rule 7825.2910, subp. 2, requires that gas utilities file for a change to increase or decrease demand.
[6] This is the five-month Maximum Storage Quantity (70,000 Dth/month x 5 months).
[7] Storage and SMS costs are charged in the commodity portion of the PGA.

Table 2: MERC's NNG-ABL Design Day Levels

Filing	Previous Design Day (Dth)	Proposed Design Day (Dth)	Design Day Changes (Dth)	Change From Previous Year (%)
August 1, 2016	13,813	13,528	(285)	(2.06)%

MERC provided significant discussion regarding its design-day calculation. The Department notes that the Company's design-day analysis is similar to the process that it has used in prior demand entitlement filings. However, it is slightly different compared to what MERC used in its other two demand entitlement filings in Docket Nos. G011/M-16-651 (MERC-Consolidated) and G011/M-16-650 (MERC-NNG). In all the dockets MERC did regressions by interstate pipeline and weather stations. However, in MERC-ABL, the regression reflected one pipeline (NNG) and the Rochester weather station mentioned below. In addition, in these other dockets, MERC was able to use daily metered data for all interruptible customers as a result of MERC's telemetry program,[8] while telemetry data is not widely available for MERC's NNG-ABL interruptible customers.

In the Petition, pages 8 and 9, MERC in part stated the following:

> In order to determine firm peak day load, volumes contained in the daily pipeline meter readings for interruptible and transportation customers needed to be isolated and removed. While it would have been ideal to have daily billing data for all customers, interruptible was only available from monthly billing records. An unfortunate, but unavoidable consequence was that this data was based on monthly billing cycles that introduce billing lag, meter read lag (not all meters were read every month resulting in billing cycle estimates and reversals), and other potential errors into their volumes. In addition, this data was only through December 2014 and after May 2015. Interruptible volumes were calculated by dividing the volumes consumed during the highest historical peak month of usage from this past winter (*i.e.*, December 2015 – February 2016) for that customer group by twenty (20) to determine the Maximum Daily Quantity ("MDQ") for that customer group.
>
> Daily data for transportation load is currently available; however, daily transportation data was only available after May 2015. The transportation volumes were calculated by finding the highest historic daily usage from this past winter (*i.e.*, December 2015 – February 2016) for that customer group.

[8] See the Department's *October 15, 2015 Comments* in Docket No. G011/M-15-723 and Docket No. G011/M-15-722.

Thus, as a result of the data issues described above, MERC used the average estimated interruptible and transportation load from this past winter to back out[9] from its design day estimates. This approach seems acceptable given the constraints in data availability.

Regarding the use of weather station data in its peak-day analysis, MERC indicated that, consistent with its approach in previous years, the Company searched eight daily weather station data files[10] to identify the coldest Adjusted Heating Degree Day (AHDD65) in the last 20 years at each weather station. MERC used the data from the Rochester weather station (shown below) in its design-day calculation for NNG-ABL:

Station	Date	Avg. Temp	Avg. Wind	HDD65	AHDD65
Rochester	2/2/1996	-27	10	92	101

In the Department's December 31, 2015 Comments in Docket No. G011/M-15-724, at pages 4-5, the Department discussed how the Albert Lea Town Border Station (TBS) experienced the vast majority of the throughput used to serve MERC's (formerly IPL's) customers. In the Commission's April 28, 2016 Order in Docket Nos. G011/M-15-722, G011/M-15-723, and G011/M-15-724, Order Point 6 stated the following:

> Accepted MERC-NNG-Albert Lea's peak-day analysis with the following caveat: Required MERC to fully justify its selection of the Rochester weather station as opposed to Albert Lea in its Design Day calculation in its next NNG-Albert Lea demand entitlement petition; and

Even though MERC requested no changes in the level of contracted capacity, the Department recommends that MERC provide the justification of its selection of the Rochester weather station in its *Reply Comments*, and thus comply with the Commission's Order referenced above. In addition, the Department requests that as part of its justification, MERC redo its design-day regression analysis with Albert Lea weather data and provide the results concurrently with its *Reply Comments*.

The Commission's April 28, 2016 Order 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.

[9] See MERC's Attachment 1, page 2 of 3.
[10] The eight weather stations were International Falls, Bemidji, Cloquet, Fargo, Minneapolis, Rochester, Worthington, and Ortonville.

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 stated the following, in part:

> With respect to the MERC-Albert Lea PGA, the increase in Design Day requirements of 898 Dth/day from the 2014-2015 demand entitlement submitted by Interstate Power and Light and the 2015-2016 demand entitlement submitted by MERC was based in part on the differences in methodology between MERC's peak day analysis and the peak day analysis that had been conducted by Interstate Power and Light. The 2014- 2015 Albert Lea Peak Day analysis was conducted by Interstate Power and Light with the results presented in Docket No. G001/M-14-560. The 2015-2016 Peak Day Demand forecast was conducted by MERC. The process used by MERC included 1) Obtaining daily weather and throughput volume data; 2) Performing total throughput peak day regressions; 3) Subtracting interruptible and transport expected peak day load volumes based on monthly billing data; and 4) Applying the sales forecast growth rates. This approach was used because it introduced much less error into the data and regressions than trying to guess how to allocate monthly billing cycle data to daily when the load factors and relative temperature sensitivity of the non-daily-metered customers was not known. Using only the daily metered data for the regressions makes the best use of the best data available and provides insights into the total daily metered load that could be active on a peak day even if supply access at the non-firm pipeline meters were shut off.

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 observes 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 future demand entitlement filings, MERC check the regression models it ultimately uses for autocorrelation and correct the model if autocorrelation is present.

Thus, the Department recommends that the Commission withhold acceptance of MERC NNG-ABL's peak-day analysis until MERC provides justification for the use of the Rochester weather station data as required by the Commission's April 28, 2016 Order mentioned herein.

3. Reserve Margin

Table 3 and DOC Attachment 2 present MERC's proposed reserve margin in Dth as filed on August 1, 2016 as follows:

Table 3: MERC's NNG-ABL Reserve Margin

Filing	Total Entitlement (Dth)	Design-day Estimate (Dth)	Difference (Dth)	Reserve Margin %	Percentage Point Change From Previous Year
August 1, 2016	14,190	13,528	(285)	4.89%	2.16%

The proposed reserve margin of 4.89 percent represents an increase of 2.16 percentage points over last year's reserve margin of 2.73 percent.

B. THE COMPANY'S PGA COST RECOVERY PROPOSAL

The Company's demand entitlement proposal would result in the following annual demand cost impacts:[11]

- Annual bill increase of $0.00 related to demand costs for the average General Service customer consuming 89 Dth annually;
- no demand cost impacts related to MERC-ABL's Large General Service and interruptible rate classes.

III. THE DEPARTMENT'S RECOMMENDATIONS

The Department will provide its recommendations to the Commission in Response Comments, after MERC files Reply Comments. The Department recommends that MERC provide, in its Reply Comments, the justification of its selection of data from the Rochester weather station in NNG-ABL's peak-day analysis, and thus comply with the Commission's Order referenced above. In addition, the Department requests that as part of its justification, MERC redo its design-day regression analysis with Albert Lea weather data and provide the results concurrently with its Reply Comments.

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[11] Attachment 11, page 1.

Department Attachment 1
Docket No. G011/M-16-652
MERC NNG-Albert Lea Demand Entitlement Historical and Current Proposal

			Proposed 8/1/16			
Contract Type	2014-2015 Quantity (Mcf)	2015-2016 Quantity (Mcf)	2016-2017 Quantity (Mcf)	Change in Quantity (Mcf)	Change in Capacity (%)	Change in Design Day (%)
TF12B	1,393	3,904	3,904	0		
TF12V	8,020	5,489	5,489	0		
TF5	4,006	3,997	3,997	0		
TFX12	0	0	0	0		
TFX(5)	800	800	800	0		
Total Entitlement	**14,219**	**14,190**	**14,190**	**0**	**0.00%**	**-2.06%**
Total Annual Transportation	**9,413**	**9,393**	**9,393**	**0**	**0.00%**	
Total Winter Only Transport	**4,806**	**4,797**	**4,797**	**0**	**0.00%**	
Percent of Winter Only Capacity	33.80%	33.81%	33.81%			

Source: MERC's Attachments 3 & 7

Department Attachment 2
Docket No. G011/M-16-652
MERC NNG-Albert Lea 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	10,734	44	0.41%	13,528	(285)	-2.06%	14,190	0	0.00%	662	4.89%
2015-2016	10,690	0	0.00%	13,813	898	6.95%	14,190	(29)	-0.20%	377	2.73%
2014-2015	10,690	14	0.13%	12,915	(120)	-0.92%	14,219	0	0.00%	1,304	10.10%
2013-2014	10,676	68	0.64%	13,035	(407)	-3.03%	14,219	0	0.00%	1,184	9.08%
2012-2013	10,608	(41)	-0.39%	13,442	515	3.98%	14,219	(3,271)	-18.70%	777	5.78%
2011-2012	10,649	66	0.62%	12,927	(3,767)	-22.56%	17,490	0	0.00%	4,563	35.30%
2010-2011	10,583			16,694			17,490			796	4.77%
Average			0.24%			-2.94%			-3.15%		10.38%

	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			0.0617	1.2603	1.3220	unknown
2015-2016	10,733	16	0.15%	0.0353	1.2921	1.3274	1.0040
2014-2015	10,717	(513)	-4.57%	0.1220	1.2081	1.3301	1.0025
2013-2014	11,230	1,318	13.30%	0.1109	1.2210	1.3319	1.0519
2012-2013	9,912	1,500	17.83%	0.0732	1.2672	1.3404	0.9344
2011-2012	8,412	(1,830)	-17.87%	0.4285	1.2139	1.6424	0.7899
2010-2011	10,242			0.0752	1.5774	1.6527	0.9678
Average			1.77%	0.1295	1.2914	1.4210	0.9584

Source: MERC's Attachment 1

Department Attachment 3
Docket No. G011/M-16-652
MERC NNG-Albert Lea 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	$3.6168	$2.8063	$2.9425	$2.8971	-19.90%	3.24%	-1.54%	($0.0454)
Demand Cost	$1.0379	$0.9194	$1.0379	$1.0379	0.00%	12.89%	0.00%	$0.0000
Commodity Margin	$2.3980	$2.1806	$2.3980	$2.3980	0.00%	9.97%	0.00%	$0.0000
Total Cost of Gas	$7.0527	$5.9063	$6.3784	$6.3330	-10.20%	7.22%	-0.71%	($0.0454)
Average Annual Use	89	89	89	89				
Average Annual Cost of Gas*	$627.69	$525.66	$567.68	$563.64	-10.20%	7.22%	-0.71%	($4.04)

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	$3.6168	$2.8063	$2.9425	$2.8971	-19.90%	3.24%	-1.54%	($0.0454)
Demand Cost	$1.0379	$0.9194	$1.0379	$1.0379	0.00%	12.89%	0.00%	$0.0000
Commodity Margin	$1.8232	$1.6579	$1.8232	$1.8232	0.00%	9.97%	0.00%	$0.0000
Total Cost of Gas	$6.4779	$5.3836	$5.8036	$5.7582	-11.11%	6.96%	-0.78%	($0.0454)
Average Annual Use	897	897	897	897				
Average Annual Cost of Gas*	$5,810.68	$4,829.09	$5,205.83	$5,165.11	-11.11%	6.96%	-0.78%	($40.72)

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	$3.6168	$2.8063	$2.9425	$2.8971	-19.90%	3.24%	-1.54%	($0.0454)
Commodity Margin	$0.9336	$0.8490	$0.9336	$0.9336	0.00%	9.96%	0.00%	$0.0000
Total Cost of Gas	$4.5504	$3.6553	$3.8761	$3.8307	-15.82%	4.80%	-1.17%	($0.0454)
Average Annual Use	5,543	5,543	5,543	5,543				
Average Annual Cost of Gas*	$25,222.87	$20,261.33	$21,485.22	$21,233.57	-15.82%	4.80%	-1.17%	($251.65)

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	$3.6168	$2.8063	$2.9425	$2.8971	-19.90%	3.24%	-1.54%	($0.0454)
Commodity Margin	$0.5007	$0.4553	$0.5007	$0.5007	0.00%	9.97%	0.00%	$0.0000
Total Cost of Gas	$4.1175	$3.2616	$3.4432	$3.3978	-17.48%	4.18%	-1.32%	($0.0454)
Average Annual Use	42,000	42,000	42,000	42,000				
Average Annual Cost of Gas*	$172,935.00	$136,987.20	$144,614.40	$142,707.60	-17.48%	4.18%	-1.32%	($1,906.80)

Change Summary	Commodity Change $/Mcf	Demand Change $/Mcf	Total Monthly Change $/Mcf	Total Monthly Change %	Average Annual Change
General Service	($0.0454)	$0.0000	($0.0454)	-0.71%	($4.04)
Large General Service	($0.0454)	$0.0000	($0.0454)	-0.78%	($40.72)
SV Interruptible Service	($0.0454)	$0.0000	($0.0454)	-1.17%	($251.65)
LV Interruptible Service	($0.0454)	$0.0000	($0.0454)	-1.32%	($1,906.80)

* Average Annual Bill amount does not include customer charges.

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-16-652

Dated this 28th day of October 2016

/s/Sharon Ferguson

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