

July 2, 2018

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

RE: **Minnesota Department of Commerce, Division of Energy Resources Response**
Docket No. E001, 115, 140, 105, 139, 124, 126, 145, 132, 114, 6521, 142, 143/PA-14-322

Dear Mr. Wolf:

The Minnesota Department of Commerce, Division of Energy Resources (Department or the DOC) provides this letter in response to Southern Minnesota Energy Cooperative's (SMEC, Cooperative) Reply Comments dated June 8, 2018 in this docket.

The Department requested that SMEC provide some additional information regarding "the potential for mitigating the proposed 5 percent increases identified for Freeborn Mower and Steele Waseca in the final year of the Transition Period". The Cooperative responded to the Department's request by explaining that the information provided for Steel-Waseca's proposed 2020 rate increase included in its response to Department Information Request no. 67 was incorrect. The Cooperative provided corrected information, which indicates that Steele-Waseca's proposed average increase in year 1 of the Transition Period decreased from 5.31% to 5.0%. SMEC also noted that Steele-Waseca's proposed total two-year increase in base rates of 10.25 percent is still below the 13.80 percent increase in costs identified for the former Interstate Power & Light's (IPL) service territory in Steele-Waseca's Class Cost of Service Study (CCOSS).

SMEC also provided an updated estimate of the impact of the removal of the 2 mill per kilowatt hour credit currently being applied to the Power Cost Adjustment (PCA) for residential customers.¹ The Cooperative further noted that, even after considering the effect of the removal on base rates, the overall two-year increase in an average bill for a residential customer would be 12.06 percent, which is less than the 13.80 percent increase identified in Steele-Waseca's CCOSS.

The Department appreciates SMEC's efforts to provide this corrected information and notes that it considers Steele Waseca's proposed rate increases are supported by this additional information.

¹ This updated figure is equal to \$1.59 per month. As noted in our previous comments, SMEC proposed the 2 mil adjustment in the initial filing in this proceeding.

As to Freeborn Mower (FM), SMEC noted that FM had agreed to cap its increase in base rates over the two-year Transition Period to the 8.82 percent increase identified in its CCOSS. From the Department’s calculations, it appears that the second year increase in base rates will be equal to 3.34 percent.² The overall two-year increase including the effect of the removal of the 2 mill per kilowatt-hour credit will be 10.61 percent with 7.09 percent occurring in the first year and 2.6 percent in the second year. While this increase is still significant, the Department notes that it is somewhat less than the 12.37 percent increase that FM proposed originally. Moreover, the proposed 8.82 percent increase in base rates is consistent with the results of FM’s CCOSS for the cost increase identified as being necessary for revenues to equal costs in the FM’s former IPL service territory. Table 1 summarizes this information on a percentage basis.

Table 1 – Comparison of Freeborn Mower Residential Class Average Bill Increases for Remaining 2 Years of Transition Period (%)

Description	Initial	Current	Difference
Year 1 Increase	5.31%	5.31%	Not applicable
Year 2 Increase	5.00%	3.34%	-1.66%
Total Base Rate Increase	10.57%	8.82%	-1.75%
Removal of 2 mil Credit	1.79%	1.79%	Not applicable
Total Increase in Average Bill over 2 Year Period	12.36%	10.61%	-1.75%

Table 2 provides the same information on a nominal basis.

Table 2 – Comparison of Freeborn Mower Residential Class Average Bill Increases for Remaining 2 Years of Transition Period (\$/month)³

Description	Initial	Current	Difference
Year 1 Increase	\$3.92	\$3.92	Not applicable
Year 2 Increase	\$3.89	\$2.60	-\$1.29
Total Base Rate Increase	\$7.81	\$6.52	-\$1.29
Removal of 2 mil Credit	\$1.32	\$1.32	Not applicable
Total Increase in Average Bill over 2 Year Period	\$9.13	\$7.84	-\$1.29

² This calculation assumes that FM’s first year average increase in base rates remains at 5.31 percent.

³ Freeborn Mower’s average monthly residential bill under current rates is \$73.88.

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The Department continues to recommend that the Commission find that SMEC **complied** with the Commission's Order dated June 15, 2015 in this proceeding. Given the additional information provided in SMEC's Reply Comments, the Department also recommends that the Commission find that the SMEC Member Cooperatives' Class Cost of Service Studies **support** the proposed rate changes.

The Department is available to answer any questions that the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ JOHN KUNDERT
Financial Analyst

/s/ ANGELA BRYNE
Financial Analyst

/s/ STEPHEN COLLINS
Rates Analyst

JK/AB/SC/ja
Attachment

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 to Reply Comments**

**Docket No. E001, 115, 140, 105, 139, 124, 126, 145, 132, 114, 6521, 142,
143/PA-14-322**

Dated this 2nd day of July 2018

/s/Sharon Ferguson

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