

July 28, 2015

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

RE: **Response Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G004/M-15-422

Dear Mr. Wolf:

Attached are the Response Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department), in the following matter:

Great Plains Natural Gas Co.'s Petition for Approval of its CIP Tracker and Demand Side Management Incentive.

The Department recommends **approval, with modifications**, and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ CRAIG ADDONIZIO
Financial Analyst

CA/lt
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

RESPONSE COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET No. G004/M-15-422

I. INTRODUCTION AND BACKGROUND

On May 1, 2015, Great Plains Natural Gas Co., a Division of MDU Resources Group, Inc. (Great Plains or the Company), submitted a petition (Petition) to the Minnesota Public Utilities Commission (Commission) containing the Company's

- 2014 Conservation Improvement Program (CIP) Status Report for the period January 1, 2014 through December 31, 2014,
- 2014 CIP Tracker filing, and
- Demand Side Management (DSM) Incentive for the period January 1, 2014 through December 31, 2014.

On July 1, 2015, the Department filed Comments in which it concluded that Great Plains' Petition was largely reasonable, but noted that the Company has a large custom project that is expected to be placed in service in the fall of 2015, and that the expenses associated with this project were not reflected in the Company's proposed Conservation Cost Recovery Adjustment (CCRA). Omitting the project's expenses from the proposed CCRA calculations would create the potential for significant under-recovery during the period the proposed CCRA is expected to be in effect (September 1, 2015 through August 31, 2016). The Department requested that the Company explain in Reply Comments whether it would be appropriate to reflect the expected costs for this custom project in its proposed CCRA.

On July 15, 2015, the Company filed Reply Comments that addressed the Department's request.

II. DEPARTMENT ANALYSIS

A. LARGE CUSTOM PROJECT

In its Reply Comments, the Company stated that, after review, it has determined that the large custom project referenced in the Department's Comments is very likely to be completed during 2015, and concluded that it is reasonable to reflect the anticipated expenses of the project in the proposed CCRA. Great Plains' updated its CCRA calculation to reflect an estimate of \$115,200 in costs for the custom project. The updated calculations were provided with the Company's Reply Comments in Revised Attachment E.

As shown in Revised Attachment E, as a result of reflecting the custom project, the Company's proposed CCRA has risen from \$0.0011 per dekatherm (Dth) to \$0.0225 per Dth. Table 1 provides a summary of Great Plains' calculation of its revised proposed CCRA.

Table 1
Calculation of Revised Proposed CCRA

Description	Amount
CIP Tracker Account Balance as of Jan.1, 2015	(49,755)
Actual and Estimated CIP Expenses Jan. - Aug. 2015	487,754
Actual and Estimated Carrying Charges Jan. - Aug. 2015	(374)
Proposed 2014 DSM Financial Incentive	42,180
Estimated CIP Cost Recovery via Base Rates Jan. - Aug. 2015	(88,392)
Estimated CIP Cost Recovery via Existing CCRA Jan. - Aug. 2015	(270,556)
Estimated CIP Tracker Account Balance as of Aug. 31, 2015	120,857
Projected Sales Sept. 2015 - Aug. 2016 (Dth)	5,365,800
Proposed CCRA (\$/Dth)	<u>0.0225</u>

Source: Reply Comments, Revised Attachment E

Table 2 provides a summary of the expected bill impact the revised proposed CCRA will have for an average residential customer.

Table 2
Change in CCRA and Bill Impact

	CCRC (\$/Dth)	CCRA (\$/Dth)	Total (\$/Dth)	Avg. Annual Residential Consumption (Dth)	Avg. Annual CIP Cost (\$)
Current Rate	0.0259	0.0747	0.1006	78	7.85
Proposed Rate	<u>0.0259</u>	<u>0.0225</u>	<u>0.0484</u>	78	<u>3.78</u>
Change (\$)	-	(0.0522)	(0.0522)		(4.07)
Change (%)	0%	-70%	-52%		-52%

Source: Reply Comments, Revised Attachment E

As shown, the revised proposed CCRA is 70 percent less than the current CCRA, and the amount paid by an average residential customer for CIP costs during the year is expected to be approximately \$4.07 less under the revised proposed CCRA than it would be under the current CCRA.

The Department concludes that Great Plains' revised proposed CCRA of \$0.0225 per Dth is reasonable.

B. RECOMMENDATION REGARDING CARRYING CHARGE INTEREST RATE

As discussed in the in the Department's Comments, the Commission's December 17, 2014 Order in Great Plains' last CIP Docket, Docket No. G004/M-14-358 (the 2014 CIP Docket), required Great Plains to begin using the two-year U.S. Treasury Bond rate as of October 29, 2014 to calculate carrying charges on its CIP tracker balance. Prior to the 2014 CIP Docket, Great Plains, similar to other utilities, had been using the allowed rate of return from its most recent rate case to calculate carrying charges. The Commission has recently started requiring utilities to use their short-term costs of debt to calculate carrying charges on tracker balances, rather than full allowed rates of return.¹ Great Plains did not have any short-term debt in its last rate case, and thus did not establish a cost of short-term debt, and the two-year U.S. Treasury bond rate was used as a substitute.

In its Comments, the Department noted that the Commission's Order in the 2014 CIP Docket specified the rate to be used in the instant Docket, but did not address the rate to be used for carrying charges in future petitions. The Department therefore recommended that the Commission require Great Plains, in future petitions for approval of its CIP Tracker and demand side management incentive, to update the interest rate used to calculate carrying charges to reflect the two-year U.S. Treasury bond interest rate as of the time the Company is preparing the petition.

¹ See, for example, Docket No. E017/M-14-201.

In the course of preparing these Response Comments, the Department realized that it may have been the Commission's intention in the 2014 CIP Docket to set the interest rate at the specified level, and leave that interest rate in place until either (a) the Commission establishes a short-term cost of debt for the Company in a rate case, or (b) the two-year U.S. Treasury Bond rate as of October 29, 2014 becomes unreasonable for some other reason (e.g., interest rates change dramatically), in which case Great Plains could propose an adjustment.

The Department would not object to leaving the interest rate for carrying charges unchanged if this was the Commission's intention, however, the Department maintains its recommendation from its Comments that the Commission require Great Plains to update the interest rate annually. From the perspective of ratepayers, the difference between the two options is likely to be quite small. Additionally, the Department's recommendation eliminates some judgement regarding whether an adjustment might be necessary in a future petition, particularly if Great Plains does not establish a short-term cost of debt in a rate case for many years.

III. CONCLUSION AND RECOMMENDATIONS

Based on its analysis, the Department concludes that Great Plains' proposal is reasonable, and recommends that the Commission:

- 1) approve Great Plains' 2014 financial incentive of \$42,180 to be included in the Company's CIP tracker no sooner than the issue date of the Commission's Order in the present docket;
- 2) approve the CIP tracker activity and end of 2014 tracker balance as shown in Table 1 of the Department's July 1, 2015 Comments;
- 3) approve Great Plains' revised proposed CCRA of \$0.0225 per Dth for all customer classes and require that the CCRA approved by the Commission be effective in the billing month immediately following the issue date of the Order in the present docket, conditioned on the Company submitting, within 10 days of the Order, a compliance filing with the relevant tariff sheets and necessary calculations that comply with the Commission's determinations;
- 4) require Great Plains, in future petitions for approval of its CIP Tracker and demand side management incentive, to update the interest rate used to calculate carrying charges to reflect the two-year U.S. Treasury bond interest rate as of the time the Company is preparing the petition;

- 5) require Great Plains to include the following bill message in the billing month immediately following the date of the Order in the present docket:

Great Plains recovers the costs changes in its energy conservation programs from the base established in 2007 through a Conservation Cost Recovery Adjustment (CCRA) subject to MN Public Utilities Commission approval. A CCRA of \$0.0225 per dk as shown in the Resource Adjustment above is effective. Learn more about reducing your energy use by visiting our website at www.gpng.com or calling us at 1-877-267-4764.

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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**

Docket No. G004/M-15-422

Dated this 28th day of July 2015

/s/Sharon Ferguson

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