

December 8, 2025

Sasha Bergman
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 Nos. G999/CI-21-135 and G011/CI-21-611

Dear Ms. Bergman:

Attached are the comments of the Minnesota Department of Commerce (Department) in the following matter:

*In the Matter of a Commission Investigation into the Impact of Severe Weather in
February 2021 on Impacted Minnesota Natural Gas Utilities and Customers*

*In the Matter of a Petition of Minnesota Energy Resources Corporation for
Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas
Market Conditions*

Minnesota Energy Resources Corporation (MERC) filed its 2025 annual compliance filing in this proceeding on August 1, 2025.

The Department recommends the Minnesota Public Utilities Commission **approve** MERC's 2025 annual compliance filing and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

AU/JK/ad
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket Nos. G999/CI-21-135 and G011/CI-21-611

I. INTRODUCTION

The Minnesota Department of Commerce, Energy Division (Department) provides comments on Minnesota Energy Resources Corporation's (MERC or the Company) annual compliance filing submitted August 1, 2025, for these two dockets. These two dockets can be thought of as two aspects of the Minnesota Public Utilities Commission's (Commission, MPUC) response to the costs associated with the natural gas market's February 2021 Pricing Event (PE) during Winter Storm Uri. Docket No. G011/CI-21-611 focused primarily on the recovery of the costs resulting from the February 2021 Pricing Event.¹ Docket No. G999/CI-21-135 was more concerned with MERC's efforts to improve its ability to mitigate the risk of short-term price spikes on a forward-looking basis.

MERC's 2025 annual compliance filing (ACF) was less complicated than its 2024 ACF. Natural gas wholesale prices across Minnesota and the Upper Midwest during the 2024-2025 heating season did not demonstrate the short-term price volatility experienced during the January 2024 pricing event. Thus, MERC didn't have to comply with the additional reporting requirements regarding rapid gas price increases included in the Commission's 2024 ACF Order which superseded those included in the Minnesota Public Utilities Commission's (Commission) February 17th, 2023, Order.^{2,3}

The Company did provide information regarding the ten active reporting requirements the Commission listed in in those two Orders.

The Commission issued a Notice of Comment (NOC) for MERC's 2025 ACF on August 11th, 2025.

¹ *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions*, MPUC, Order, August 30, 2021, Docket Nos. G999/CI-21-135 and G011/CI-21-611, (eDockets) [20218-177548-04](#), issued August 30, 2021 (hereinafter "August 30th Order").

² *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions*, MPUC, Order, February 17, 2023, Docket Nos. G999/CI-21-135 and G011/CI-21-611, (eDockets) [20232-193249-04](#), issued February 17, 2023, at Order Pts. 3-11 (hereinafter "February 17th Order").

³ *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions*, MPUC, Order, February 17, 2023, Docket Nos. G999/CI-21-135 and G011/CI-21-611, (eDockets) [20256-219485-01](#), issued June 2, 2025, at Order Pts. 5-7 (hereinafter "June 2nd Order").

The Commission included the following questions in the NOC:

- Does the natural gas utilities annual compliance filings comply with the February 2023 and June 2025 Commission’s Orders?
- Are Great Plains’ conclusions of its voluntary conservation report reasonable?
- Are the gas utilities’ reports regarding interruptible customer compliance and incorporation of curtailment calls reasonable?
- Are the gas utilities’ reports regarding hedging, procurement and customer communication strategies achieving reasonable savings for ratepayers?
- Should the compliance filings be accepted and approved?
- Should the Commission make any changes to future compliance filing requirements?
- Are there other issues or concerns related to this matter?

II. PROCEDURAL BACKGROUND

February 12 through 22, 2021	A combination of significant disruptions in natural gas supply combined with a sharp rise in natural gas demand, led to an extraordinary increase in natural gas spot market prices in Minnesota. The effects of the price spike were amplified by the closure of the wholesale natural gas markets for the three-day Presidents Day holiday weekend (February 2021 Pricing Event).
August 30, 2021	The Commission issued its ORDER GRANTING VARIANCES AND AUTHORIZING MODIFIED COST RECOVERY SUBJECT TO PRUDENCE REVIEW, AND NOTICE OF AND ORDER FOR HEARING. ⁴
October 19, 2022	The Commission issued its ORDER DISALLOWING CERTAIN NATURAL GAS COSTS AND REQUIRING FURTHER ACTION. ⁵
February 17, 2023	The Commission issued its ORDER REQUIRING ACTIONS TO MITIGATE IMPACTS FROM FUTURE NATURAL GAS PRICE SPIKES, SETTING FILING REQUIREMENTS, AND INITIATING A PROCEEDING TO ESTABLISH GAS RESOURCE PLANNING REQUIREMENTS. ⁶
August 1, 2023	MERC filed its 2023 ACF. ⁷

⁴ August 30th Order, (eDockets) [20218-177548-04](#).

⁵ *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions*, MPUC, Order, October 19, 2022, Docket Nos. G999/CI-21-135 and G011/CI-21-611, (eDockets) [202210-189970-01](#).

⁶ February 17th Order, (eDockets) [20232-193249-04](#).

⁷ *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Minnesota Energy Resources Corporation for*

November 1, 2023	The Department provided comments on MERC's 2023 ACF. ⁸
January 26, 2024	MERC submitted a compliance filing on the cost impacts due to extreme market conditions. ⁹
April 1, 2024	MERC filed its final quarterly compliance and tracking filing for the surcharge recovery. ¹⁰
July 30, 2024	The Commission issued an order accepting and approving the Company's 2023 ACF. ¹¹
August 1, 2024	The Company filed its 2024 ACF. ¹²
August 29, 2024	The Commission issued a Notice of Comment period for MERC's 2024 ACF. ¹³

Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions, MERC, Compliance, August 1, 2023, Docket Nos. G999/CI-21-135 and G011/CI-21-611, (eDockets) [20238-197916-01](#), (hereinafter "2023 ACF").

⁸ *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions*, Department, Comments, November 1, 2023, Docket Nos. G999/CI-21-135 and G011/CI-21-611, (eDockets) [202311-200161-02](#), (hereinafter "2023 Department Comments").

⁹ *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions*, MERC, Compliance, January 26, 2024, Docket Nos. G999/CI-21-135 and G011/CI-21-611, (eDockets) [20241-202729-01](#), (hereinafter "January 2024 Price Spike Filing").

¹⁰ *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions*, MERC, Compliance, April 1, 2024, Docket Nos. G999/CI-21-135 and G011/CI-21-611, (eDockets) [20244-204868-01](#), (hereinafter "April 2024 Surcharge Recovery Filing").

¹¹ *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions*, MPUC, Order, July 30, 2024, Docket Nos. G999/CI-21-135 and G011/CI-21-611, (eDockets) [20247-209084-04](#), (hereinafter "Order Approving 2023 ACF").

¹² *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions*, MERC, Compliance, August 1, 2024, Docket Nos. G999/CI-21-135 and G011/CI-21-611, (eDockets) [20248-209178-01](#), (hereinafter "2024 ACF").

¹³ *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions*, MPUC, Notice, August 29, 2024, Docket Nos. G999/CI-21-135 and G011/CI-21-611, (eDockets) [20248-209854-05](#), (hereinafter "2024 Commission Notice").

December 2-3, 2024	The Department and the Office of the Attorney General Residential Utilities Division (OAG-RUD) provided comments on MERC's 2024 ACF. ¹⁴ 15
December 12, 2024	MERC and the Citizens Utility Board of Minnesota (CUB) provided reply comments. ^{16, 17}
March 4, 2025	The Commission issued an Order accepting and approving the Company's 2023-2024 PGA True-up filing. ¹⁸
June 2, 2025	The Commission issued an order accepting and approving the Company's 2024 ACF. ¹⁹
August 1, 2025	The Company filed its 2025 ACF. ²⁰
August 11, 2025	The Commission issued a Notice of Comment period for MERC's 2025 ACF. ²¹

¹⁴ *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions*, OAG-RUD, Comments, December 2, 2024, Docket Nos. G999/CI-21-135 and G011/CI-21-611, (eDockets) [202412-212596-02](#), (hereinafter "OAG-RUD 2024 Comments").

¹⁵ *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions*, Department, Comments, December 3, 2024, Docket Nos. G999/CI-21-135 and G011/CI-21-611, (eDockets) [202412-212654-02](#), (hereinafter "Department 2024 Comments").

¹⁶ *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions*, MERC, Reply Comments, December 12, 2024, Docket Nos. G999/CI-21-135 and G011/CI-21-611, (eDockets) [202412-212953-01](#), (hereinafter "2024 MERC Reply Comments").

¹⁷ *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions*, CUB, Reply Comments, December 12, 2024, Docket Nos. G999/CI-21-135 and G011/CI-21-611, (eDockets) [202412-212947-02](#), (hereinafter "2024 CUB Reply Comments").

¹⁸ *In the Matter of the Review of the 2023-2024 Annual Automatic Adjustment (AAA) Reports and Annual Purchased Gas Adjustment (PGA) True-up Filings and In the Matter of Minnesota Energy Resources Corp.'s Consolidated System 2023-2024 Annual True-Up Report*, MPUC, Order, March 4, 2025, Docket Nos. G999/AA-24-138 and G011/AA-24-286, (eDockets) [20253-216035-01](#), (hereinafter "Order Approving 2023- 2024 PGA Filing").

¹⁹ *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Minnesota Energy Resources Corp. For Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions*, MPUC, Order, June 2, 2025, Docket Nos. G999/CI-21-135 and G011/CI-21-611, (eDockets) [20256-2190485-01](#), (hereinafter "Order Approving 2024 ACF").

²⁰ *In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions*, Minnesota Energy Resources Corporation, Compliance, August 1, 2025, Docket Nos. G999/CI-21-135 and G011/CI-21-611, (eDockets) [20258-221647-01](#), (hereinafter "2025 ACF").

²¹ *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Minnesota Energy Resources Corporation for*

III. DEPARTMENT ANALYSIS

The focus of the Department's analysis are based on the Commission's questions included in its NOC. In addition, the Department reconciles the information in the Company's 2025 ACF with the ACF reporting requirements included in the Commission's February 17 and June 2 Orders.

A. RESPONSES TO COMMISSION'S QUESTIONS

The Department provides its responses to the Commission's questions follow in the order presented in the NOC.

A.1. *Does the natural gas utilities annual compliance filings comply with the Commission's Orders?*

The Department concludes that MERC's 2025 Annual Compliance Filing complies with all the reporting requirements included in the Commission's Orders related to this proceeding.

A.2. *Are Great Plains' conclusions of its voluntary conservation report reasonable?*

The topic is not relevant to MERC's filing, but will be addressed in the Department's Great Plains comments.

A.3. *Are the gas utilities' reports regarding interruptible customer compliance and incorporation of curtailment calls reasonable?*

The Department's review suggests that MERC's reports regarding interruptible customer compliance and incorporation of curtailment calls are reasonable.

A.4. *Are the natural gas utilities' reports regarding hedging, procurement and customer communication strategies achieving reasonable savings for ratepayers?*

The Department's review suggests that MERC's procurement and communications strategies are providing value and achieving reasonable potential savings to ratepayers.

A.5. *Should the compliance filings be accepted and approved?*

The Department recommends the Commission accept and approve MERC's 2025 ACF.

A.6. *Should the Commission make any changes to future compliance filing requirements?*

The Department didn't identify any future changes but will defer on making a recommendation to Commission until it has the opportunity review comments from other parties.

A.7. Are there other issues or concerns related to this matter?

The Department did not identify any issues or concerns at this time.

B. SUMMARY OF CHANGES IN MERC'S OPERATIONAL PRACTICES

B.1. Process Improvements Implemented since the February 2021 PE

In a Notice of Comment issued on August 23, 2022, the Commission asked the four affected gas utilities to respond to the two following topics:

- Each impacted natural gas utility is required to review its gas contracting, purchasing, hedging, storage, peak-shaving, interruptible, customer communications and other relevant practices and, by September 15, 2022, file a plan in its respective docket and in CI-21-135 on how it will improve or modify its practices to protect ratepayers from extraordinary natural gas price spikes in the future.
- As part of its plan, each utility shall identify the general timeframe in which it will implement the modifications, and, if the proposed change requires modification of tariff, proposed tariff language.²²

In its comments responding to the 2022 Commission Notice, MERC listed five supply-side and three demand-related modifications it used to help mitigate short-term price spikes.

B.2. Procurement Practices

The procurement or supply-related changes included:

- 1) Gas contracting – the Company issued a Request for Proposals (RFP) for call options priced at the First of Month index rather than daily pricing. MERC noted this product would provide it with the ability to call on gas supplies when needed without the having exposure to the daily market prices. Unfortunately, the Company didn't receive any cost-effective bids for the requested product.
- 2) Gas Purchasing – MERC has added baseload supply priced at FOM index and decreased planned daily purchases thereby reducing its exposure to the daily market.
- 3) Storage – the Company increased its ANR storage by 5,000 Dth/day and continues searching for other potential storage options.

²² *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions*, MPUC, Notice, August 23, 2022, Docket Nos. G999/CI-21-135 and G011/CI-21-611, (eDockets) [20228-188522-03](#), (hereinafter "2022 Commission Notice").

- 4) Hedging – MERC continues to use financial futures and call options, while simultaneously researching new products or services that could help mitigate hedge price risk.
- 5) Transportation tariff modifications – tailoring the Company’s imbalance penalties such that they are consistent with the imbalance penalties included in the interstate pipelines’ tariffs.

B.3. Customer Communications

MERC identified three customer communications or demand-related changes:

- 1) A continuation of the Communication Plan it filed on November 1, 2021²³, in this proceeding.²⁴
- 2) An economic curtailment proposal the Company formulated with the three other rate-regulated gas utilities.²⁵
- 3) Improvements to its daily forecasting protocols for transportation customers, in part by reclassifying its largest electric generation customer.

These modified practices then formed the basis for the annual compliance filing reporting requirements included in the Commission’s February 17th Order. The Department’s analysis separates the Commission’s current reporting requirements into those two general categories.

C. ANALYSIS

The Department combined its summary of the Company’s 2023 and 2024 ACF’s since the Commission has approved both filings and discusses the Company’s 2025 ACF separately.

C.1. Supply Side Issues

C.1.1. Gas Contracting & Purchasing

a. 2023 and 2024 ACFs

MERC explained that it contracted for 30 percent more baseload volumes for the 2022-2023 heating season than it did for the 2020-2021 heating season. MERC noted that it had continued to pursue the use of call options priced at the first-of-month (FOM) index, not daily pricing. This financial instrument provides the Company with the flexibility to call on gas supplies when needed, minimizing the exposure to the volatility of the daily market. MERC noted that it had some success in negotiating what it called “Supply Call Options” for the 2024-2025 heating season.

²³ MERC’s 2025 ACF says the Communications Plan was filed with the Commission on August 30, 2021, when it was actually filed November 1, 2021.

²⁴ *Ibid* at p. 8. The Company noted the difficulties associated with voluntary conservation efforts during price spikes.

²⁵ *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions*, MERC, Comments, September 15, 2022, Docket Nos. G999/CI-21-135 and G011/CI-21-611, (eDockets) [20229-189120-03](#) (hereinafter “September 2022 Joint Comments”).

MERC purchased a little over 25% of its winter needs via daily gas supply for the 2020-2021 heating season. After the February 2021 PE, the Company began to lower that percentage to lessen its exposure to price spikes in the daily market. For the 2024-2025, MERC forecasted it would only purchase around 10% of its winter heating season needs via daily contracts. The percentage of the winter heating season requirements purchased by way of monthly contracts increased during this same period from 34% to 51% for the same reasons the percentage of the daily contracts sourced declined. The percentage of the winter heating season needs supplied by storage remained constant, declining from 40% to 39%. The difficulty of securing new storage facilities likely contributed to this result.

b. 2025 ACF

i. Order Points 5 and 6 of the February 17th Order²⁶

In its 2025 ACF, the Company stated that it had increased its monthly (base supply) purchases by 20 percent during the 2024-2025 winter season, as compared to 2020-2021.²⁷

The Company's 2025 ACF provided the following table listing the percentage of purchases for daily, monthly and stored natural gas for 2020 through 2025.

Table 1 – Comparison of Forecasted Purchases for the 2020-2021 through 2025-2026 Winter Heating Seasons (%)^{28,29}

Purchases	2020	2021	2022	2023	2024	2025
Daily	27%	21%	17%	11%	11%	7%
Monthly	35%	42%	45%	51%	51%	55%
Storage	38%	38%	38%	38%	38%	37%
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

The changes identified in the table – a much lower percentage of natural gas purchased in the daily market, and a much higher percentage purchased in the monthly market (which mitigates short-term price spike risk) is clear.

²⁶ These two Order Points are the following: 5. The gas utilities in this docket shall continue exploring the availability and cost of contracting , hedging and supply options that would provide better protection against price spikes and 6. The gas utilities in this docket shall consider variations to, and explain their plans to, incorporate a greater degree of baseload purchases.

²⁷ 2025 ACF, p.6.

²⁸ The categories termed “Monthly” and “Daily” are equivalent to “Baseload” and “Spot”.

²⁹ The Department notes 2021 and 2025 total to 101% and 99%, assuming due to rounding by MERC.

Hence, the Department concludes the Company has modified its contracting and supply options and is also purchasing more baseload gas, consistent with the Commission's directive in Order Points 5 and 6 of the February 17th Order. Hence, the Department concludes MERC has complied with those two reporting requirements.

C.1.2. Storage

Order Point 7 of the Commission's February 17th Order addressed the topic of MERC "exploring modifications to storage inventory management that could preserve withdrawal capabilities for later in the winter".

a. 2023 and 2024 ACFs

In its 2024 ACF MERC provided a detailed discussion of its reasoning for using NNG's Three-Step Firm Deferred Delivery (FDD) Service Withdrawal Option of its NNG-served service area.³⁰

Prior to the 2022-2023 winter, MERC explored options for greater withdrawal capabilities for later in the winter. MERC reviewed the NNG tariffs for storage service and was able to amend its firm storage contract to go from a 4-step storage service to a 3-step storage service. In a 4-step storage service, which MERC had during the 2020-2021 winter, MERC's maximum storage withdrawal capability drops by 23% on February 1, and then drops again on March 1 by another 25%. A 3-step storage service does not reduce its maximum storage withdrawal capability until February 15, extending MERC's full withdrawal rights, which covers MERC for the highest statistical chance of realizing a peak demand day.

During a conference call with the Company in October 2024, the Department asked about MERC's efforts to expand third-party underground storage volumes. The Company responded that it continued its efforts to secure additional third-party storage.

b. 2025 ACF

The Company stated the following regarding storage inventory management:

MERC was able to come to an agreement with a counterparty to acquire its NNG storage service on a permanent basis, beginning in the 2023-2024 heating season. Prior to that, MERC negotiated this storage capacity via short-term capacity releases. MERC's acquiring the storage capacity on a

³⁰ 2024 ACF, at p. 7. The Company was responding to a reporting requirement included in Order Point 2 of the Commission's July 30th Order that has since been discontinued.

permanent basis protects the storage rights for the benefit of customers long-term.³¹

MERC continues to seek out additional storage options to incorporate into its gas supply portfolio on NNG and/or other Consolidated PGA systems.³²

The Department notes MERC's efforts and concludes the Company complied with the reporting requirement in the Commission's February 17, 2023, Order at Order Point 7.

C.1.3. Supply Reserve Margin

Order Point 8 of the Commission's February 17th Order addressed the topic of MERC "committing to improve its supply reserve margin to minimize these quantities and explain the level of supply reserve margins in the future".³³

a. 2023 and 2024 ACFs

MERC discussed its efforts to develop a more accurate forecast for its transportation customers. The Company had some issues with that forecast during the February 2021 PE which affected its supply reserve margin. The Company discussed this topic in its 2024 ACF revisiting its earlier discussion about the improvements to the transportation forecast. The small amount of extra gas commodity costs MERC incurred during the January 2024 PE suggests that the Company's efforts to improve its supply reserve margin have been successful.

b. 2025 ACF

The Company provided a discussion of the topic, referencing the same items as in its previous annual ACFs.

The Department notes the Company's efforts and concludes MERC complied with the reporting requirement in the Commission's February 17, 2023, Order at Order Point 8.

C.1.4. Hedging Gas Prices via Financial Instruments

Order Points 5 and 10 of the February 17th Order reference this topic. Order Point 5 requires the Company to "explore the availability and cost of contracting, hedging, and supply options for better protection against price spikes". Order Point 10 is more concerned with any forward-looking gas planning or hedging filings.³⁴

³¹ 2025 ACF, p. 7.

³² *Ibid.*

³³ February 17th Order.

³⁴ *Ibid.*

a. 2023 and 2024 ACFs

Regarding hedging, MERC's most recent filing on this topic, at the time was in Docket no. G011/M-20-833. The Commission approved the Company's filing while requiring several reporting requirements. The rule variances necessary to allow the Company to continue its hedging program were approved and this approval lapsed on June 30, 2025. On November 19, 2024, MERC filed a petition in Docket No. G011/M-24-388 for an extension of the rule variances necessary to allow the Company to continue its hedging program. The Commission approved the variance on March 18, 2025 and the rule variance will stay in effect until June 30, 2029. MERC's hedging program is consistent with Xcel's and CenterPoint's. The Company didn't report any significant changes in any of the compliance filings it submitted during the past several months prior to the 2024 ACF.

b. 2025 ACF

MERC did not report any significant changes in its 2025 ACF regarding hedging activities. The Company stated:

MERC's hedging strategy covers approximately 30 percent of normal expected winter volumes through financial instruments – approximately 10 percent futures and 20 percent options. While prices have been relatively stable the past few years, forward winter prices remain high resulting in the strike price of purchased call options to be high as well.

MERC will continue to utilize financial futures and financial call options, as part of its hedging portfolio. MERC also continues to review the availability of other products... that could be implemented to help hedge against winter price spikes.³⁵

The Department concludes that the Company has complied with hedging component of Order Point #5 from the Commission's February 17th Order in its 2025 ACF. Order Point 10 is not addressed by MERC in the 2025 ACF because MERC provides this information in its demand entitlement dockets.

C.1.5. Peak Shaving

MERC doesn't have specific reporting requirements regarding peak shaving, unlike CenterPoint and Xcel. This absence of reporting requirements is reasonable since MERC doesn't have any peaking facilities in Minnesota. That situation could change, however, since the Company noted in its 2024 and 2025 ACF that it had identified the Farmington area as a potential site for a new peak shaving facility. The Company discussed this possibility in its most recent Contract Demand Entitlement filing for its NNG service area.³⁶

³⁵ 2025 ACF, p. 4-5.

³⁶ Docket No. G011/M-25-68.

The Department notes that its reporting requirement may become applicable at some point in the future.

C.2. Demand-Related Changes

C.2.1. Market Research regarding Customer Responses to Conservation Calls

Order Point 11 of the February 17th Order requires the Company to: “design plans that study customer responses to conservation calls.”³⁷

a. 2023 and 2024 ACFs

Both of MERC’s 2023 and 2024 ACFs included a discussion of the Company’s existing practices for interrupting and curtailing its interruptible customers. The 2023 ACF stated the plan to call only commercial and industrial (C&I) customers regarding curtailments or conservation efforts. Residential customers would be contacted via different communications channels. MERC noted limited call center resources were responsible for this decision. MERC also noted it is designing a study to determine C&I customers’ reaction to conservation calls and the potential effects of those changes on its gas supply.

The 2024 ACF reported the results of the study concluded a high percentage of residential customers were willing to lower their thermostats at the Company’s request during periods of high gas prices. C&I customers were not as willing to voluntarily conserve. MERC’s conclusion was that a call for conservation of C&I firm sales customers “may not achieve a significant reduction in natural gas usage.”³⁸

The OAG-RUD also filed comments and provided recommendations in response to MERC’s 2024 ACF. Specifically, the OAG-RUD recommended the Commission should require that going forward, as part of the annual August 1 price spike mitigation reports, the gas utilities report on how they are (1) improving incorporation of curtailment calls into their gas supply planning processes for both reliability and economic purposes; and (2) improving interruptible-customer compliance with curtailment issues.³⁹

CUB then submitted reply comments supporting OAG-RUD’s recommendations. CUB also included an additional recommendation requiring the Gas Utilities to continue the reporting obligations initially outlined in Order Points 3, 5-11 and 14-15 of its February 17th Order.⁴⁰

³⁷ February 17th Order.

³⁸ 2024 ACF, at p. 9.

³⁹ OAG-RUD 2024 Comments, p. 23.

⁴⁰ 2024 CUB Reply Comments, p. 3.

In its June 2nd Order, the Commission included all of OAG-RUD and CUB's recommendations at Order Points 6, 7, and 8.⁴¹

b. 2025 ACF

The Company reiterated the results of the survey conducted in 2024 stating that C&I customers are willing to conserve however, these customers are dependent upon natural gas for their business and production activities. Therefore, a call for conservation of C&I customers may not achieve a significant reduction in natural gas usage.⁴²

MERC still has its Gas Price Spike Customer Communications Plan in place; hence, the Department concludes the Company has complied with this reporting requirement.

Regarding the reporting requirements resulting from the Commission's June 2nd Order at Order Points 6 and 7, the Company provided some additional information regarding both these topics. The Company describes its processes for determining a price spike that would result in curtailment calls. In addition, MERC noted an annual letter is sent out to customers that communicates expectations of curtailment obligations, its customer notification system is tested annually, and ensures open communication channels with customers.

From the Department's perspective, the information the Company provided is sufficient to conclude MERC has complied with the requirements of those two order points. As noted previously, the OAG-RUD proposed the recommendations that resulted in Order Points 6 and 7. CUB supported those same recommendations and proposed the recommendation that resulted in Order Point 8 in the 2024 ACF review. Hence, the Department notes that its interpretation of the effort or detail associated with those reporting requirements may differ from OAG-RUD and CUB.

C.2.2. Curtailment Process Improvements for Economic and Reliability Purposes

Order Point 6 of the Commission's June 2nd Order requires the Company to use the circumstances of the event, the prevailing winter, and the status of its fuel inventory to inform its peak-shaving dispatch decisions.⁴³

As noted above, the Company describes its processes for determining a price spike that would result in curtailment calls. This process includes performing a design day forecast, followed by assessing several variables such as pipeline declarations, anticipated supply cuts, and market prices when potential for severe weather is known. MERC states the following:

⁴¹ June 2nd Order at Order Pt 5.

⁴² 2025 ACF, at p. 8.

⁴³ June 2nd Order, Order Pt. 6.

If the market is showing indications of a price spike [footnote redacted], MERC would also strongly consider implementing curtailment calls for economic purposes to interruptible system sales customers to help mitigate, or potentially eliminate, the need to make daily-priced purchases.⁴⁴

Hence, the Department concludes the Company complied with the reporting requirement.

C.2.3. Interruptible Customer Compliance with Curtailment Orders

Order Point 7 of the Commission's June 2nd Order requires the Company to report, in future August compliance filings, on how they are improving interruptible customer compliance with curtailment orders.⁴⁵

As previously stated, MERC sends out an annual letter to customers that communicates expectations of curtailment obligations, its customer notification system is tested annually, and ensures open communication channels with customers.⁴⁶

Hence, the Department concludes the Company complied with the reporting requirement.

C.3. Procedural Update

C.3.1. Reporting Obligations Not Required for Future ACFs

The Commission June 2, Order approved only some of the reporting requirements included in the two prior Orders relevant to this discussion. Specifically, the Commission approved the reporting requirements included in Ordering Points 3, 5-11 and 14-15 of the Commission's February 17, 2023, Order in its future compliance filings.⁴⁷

C.3.2. Reporting obligations from February 17th Order discontinued

Order Points 1, 2, 4, 12, 13, 16, 17 and 18 were discontinued. Department Exhibit No. 1 identifies those reporting requirements or procedural obligations that were discontinued.

C.3.3. Reporting obligation from Order Approving 2023 ACF discontinued

⁴⁴ 2025 ACF, at p. 9.

⁴⁵ June 2nd Order, Order Pt. 7.

⁴⁶ 2025 ACF, at p. 9.

⁴⁷ June 2nd Order, Order Pt. 8.

The Order Approving 2023 ACFs only contained two Order Points. Both were discontinued.

C.3.4. Gas IRP Update

The Department didn't identify any specific information regarding this topic in the Company's 2025 ACF. The Company had discussed this topic in Initial Comments.⁴⁸ MERC suggested pursuing that issue in Docket No. G999/CI-21-565, also known as "the future of gas" docket. MERC is participating in that proceeding and will file a Gas IRP at some point.

This ends the Department's review of the Commission's reporting requirements for MERC's 2025 annual compliance filing in this proceeding.⁴⁹ The Department also notes that Department Exhibit No. 1 summarizes the historical and current Commission approved reporting requirements for MERC. Department Exhibit No. 1 also provides a citation as to where the Department addressed that order point in its Comments.

D. REASONABLENESS OF MERC'S EFFORTS TO MITIGATE THE RISK OF SHORT-TERM NATURAL GAS PRICE SPIKES

Three of the topics the Commission identified in its 2025 NOC include the term "reasonable".^{50, 51} An internet search using the term "reasonableness meaning in law" resulted in the following description:

In legal terms, reasonableness refers to behavior or decisions that align with what an average, prudent person would consider fair or appropriate in a similar situation. It serves as a standard for assessing the fairness and justifiability of actions or decisions, often used in determining liability and conduct in various legal contexts. Essentially, it means doing what a reasonable person would do under the circumstances, ensuring the parties act sensibly and not excessively demanding or harmful.⁵²

The Department's interpretation of this term is that the result of the process changes the Commission required the Company or the Company chose to perform should result in MERC acquiring natural gas at prices below those the Company paid for natural gas during the Winter Storm Uri Pricing Event.

⁴⁸ Initial Comments filing submitted September 15, 2022, at p. 10 -11.

⁴⁹ The Department is not commenting on the topics covered by those Order Points not included in Order Point 8 but included in the February 17th Order. Those topics include: 1) Rejection of the economic trigger for interruptible customer curtailment; 2) Updates to existing interruptible tariffs; 3) Participation in the North American Standards Board (NAESB) focused on efforts to improve the force majeure language in the NAESB standard contract; and 4) CenterPoint and Xcel-specific reporting requirement regarding peak-shaving decisions.

⁵⁰ 2025 Commission Notice, p. 2.

⁵¹ The two topics relevant to MERC refer to its interruptible customer compliance and curtailment calls and its strategies for achieving reasonable savings for ratepayers via its hedging, procurement and customer communications processes.

⁵² See "[reasonableness meaning in law](#)" search results using Microsoft Copilot and Edge.

D.1. Reasonableness of MERC’s Hedging, Procurement and Customer Communication Strategies for Achieving Reasonable Savings for Ratepayers and Interruptible Customer Compliance and Incorporation of Curtailment Calls

D.1.1. Prices for Natural Gas Purchased during the 2024-2025 Winter Season

As noted in the Introduction, MERC didn’t purchase any natural gas during the 2024-2025 winter season that met the Commission’s threshold criterion of exceeding five times the gas commodity cost included in the Company’s current monthly PGA.^{53, 54}

Hence, there was no data produced during the 2024-2025 heating season that would allow the Department to estimate the reasonableness of the Company’s efforts for this period.

However, MERC did experience natural gas prices that met the Commission’s threshold criterion of exceeding five times the gas commodity cost included in the Company’s current monthly PGA during the 2023-2024 heating season.⁵⁵

Fortunately, the weather conditions and the corresponding effects on the supply of natural gas to Minnesota were not as severe during January 2024 Pricing Event as was experienced during the Winter Storm Uri PE.

D.1.2. Price of Gas Delivered During the January 2024 Pricing Event

The Company’s efforts to mitigate short-term price risk resulted in much lower outlay for gas costs related to the February 2024 PE compared to the January 2021 PE. Table 2 provides that comparison.

Table 2 – Comparison of MERC’s Gas Commodity Costs for the February 2021 and January 2024 Pricing Events⁵⁶

Event	Cost/Recovery Mechanism	Amount (\$)	Percentage Feb 2021 PE Cost (%)
Feb. 2021 PE			
	AAA	\$ 13,625,525	18.0%
	Extraordinary Gas Costs	\$ 61,975,993	82.0%
	Total	\$ 75,601,407	100.0%
Jan. 2024 PE			
	Daily Gas Cost Greater than 5x PGA	\$ 285,832	0.378%

⁵³ June 2nd Order, at Order Pt 9.

⁵⁴ 2025 ACF, p. 2.

⁵⁵ January 2024 Price Spike Filing, p. 2.

⁵⁶ Department 2024 Comments , p. 16.

A comparative analysis of the Company’s efforts compared to that of two of the other three Minnesota rate-regulated gas utilities requesting recovery of high gas costs associated with the January 2021 may also be of value. Table 3 provides that comparison.⁵⁷

The Department included the total costs for each of the pricing events in Table 3 to illustrate the magnitude of the costs associated with the two events. MERC incurred very few extra gas costs during the 2024 PE. That result suggests the Company’s efforts were reasonable.

Table 3 – Comparison of MERC’s Gas Commodity Costs for the February 2021 and January 2024 Pricing Events to CenterPoint, and Great Plains Natural Gas’ Gas Commodity Costs

Company	Event	Description	Amount (\$)	% of Feb 2021 PE Costs
Great Plains	Feb. 2021	Total	\$ 12,608,301	NA
	Jan. 2024	Gas Cost greater than 5x PGA	\$ 778,880	6.18%
MERC	Feb. 2021	Total	\$ 75,601,407	NA
	Jan. 2024	Gas Cost greater than 5x PGA	\$ 285,832	0.38%
CenterPoint	Feb. 2021	Total	\$ 466,100,182	NA
	Jan. 2024	Gas Cost greater than 5x PGA	\$ 46,975,064	10.08%
Feb 2021 Total			\$ 554,309,890	
Jan 2024 Total			\$ 48,039,776	8.67%

The Department also asked MERC whether it had initiated any significant modifications to the various processes it had used to achieve this result during the 2024 PE in several information requests (IRs) for the 2025-2026 heating season.⁵⁸ The Company’s response to each of those IRs was that it had not modified those processes.⁵⁹

The combination of the results of the 2024 February PE and the Company’s statements that it has not changed its processes for the 2025-2026 heating season support a conclusion that MERC’s efforts relative to its hedging, procurement and custom communication strategies are reasonable.

D.1.3. Reasonableness of MERC’s Interruptible Customer Compliance and Incorporation of Curtailment Calls

The Department discussed CPE’s efforts to comply with the Commission’s requirements regarding the Company’s Interruptible Customer Compliance and Incorporation of Curtailment Calls earlier in this document and concluded that a lack of data prevented the development of any analysis. By default, the Department concluded the Company had complied with the Commission’s reporting requirements. The Department adopts a similar stance regarding this question. CenterPoint has made efforts in these areas. The Department cannot evaluate the reasonableness of those efforts if the program hasn’t been

⁵⁷ Xcel classified the information in Table 3 as **Trade Secret**. Hence, the Department didn’t include it.

⁵⁸ See Attachment DOC-1-C .

⁵⁹ *Ibid.* Responses to IRs 89-94 and 96-97.

utilized. Hence, the Department defaults to a conclusion that CPE's efforts are reasonable given current information.

E. EXTRAORDINARY GAS COST-RECOVERY

E.1. Recovery of Extraordinary Gas Costs

On April 1, 2024, MERC filed its final quarterly report related to the recovery of costs associated with February 2021 gas market conditions. The combined under-recovery balance for this account was \$809,818.⁶⁰ The Company also stated that it would seek approval from the Commission of that under-recovered balance via the Annual Automatic Adjustment (AAA) Report that was to be filed September 1, 2024, consistent with past Commission Orders.⁶¹

In Department IR #98 the Department asked if MERC had completely recovered the \$809,818 under-recovery in the 2024 AAA Report.⁶² The Company confirmed that it had.⁶³

The Commission approved the Company's 2024 PGA True-up on March 4, 2025.⁶⁴ The Department concludes that MERC has been provided an option for complete cost recovery of the Winter Strom Uri costs and has no further comment or recommendation.

IV. RECOMMENDATIONS

Based on analysis of MERC's 2025 ACF and the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

A. RESPONSE TO COMMISSION QUESTIONS

The Department:

- A.1. - concludes MERC's 2025 ACF complies with the Commission's Orders in this proceeding.
- A.2. – this topic is not relevant to MERC.
- A.3. – concludes the reports regarding interruptible customer compliance and incorporation of curtailment calls in MERC's 2025 ACF are reasonable.
- A.4. – concludes the information regarding hedging, procurement and customer communication in MERC's 2025 ACF are reasonable.

⁶⁰ April 2024 Surcharge Recovery Filing, p. 2.

⁶¹ August 30th Order, Order Pt. 6.

⁶² Docket No. G999/AA-24-138.

⁶³ See Attachment DOC-2-C.

⁶⁴ Order Approving 2023-2024 PGA Filing, Order Pt. 7.

- A.5 – recommends the Commission approve MERC’s 2025 ACF for these two dockets and not require additional reporting requirements related to other issues or concerns related to this matter.⁶⁵
- A.6 – did not identify any required additional changes to future compliance filing requirements but will defer making a recommendation until it can review other party’s comments.
- A.7 – did not identify any issues or concerns at this time.

B. SUMMARY OF MERC’S GAS PRACTICES COMMENTS

The Department has no recommendations for this section.

C. ANALYSIS

The Department:

- C.1. – recommends the Commission find MERC complied with the relevant reporting requirements reviewed in the following sections:
 - C.1.1. – *Gas Contracting and Purchasing.*
 - C.1.2. – *Storage.*
 - C.1.3 – *Supply Reserve Margin.*
 - C.1.4 – *Hedging Gas Prices via Financial Instruments.*
 - C1.5 – *Peak-Shaving.*
- C.2 – recommends the Commission find MERC complied with the relevant reporting requirements reviewed in the following sections:
 - C.2.1 – *Market Research.*
 - C.2.2 – *Interruptible Curtailment Calls.*
 - C.2.3 – *Interruptible Customer Compliance.*

D. REASONABLENESS OF MERC’S EFFORTS TO MITIGATE THE RISK OF SHORT-TERM NATURAL GAS PRICE SPIKES

- D.1.2 – recommends the Commission find MERC’s efforts reasonable and approve.
- D.1.3. – recommends the Commission find MERC’s efforts reasonable and approve.

E. STATUS OF MERC’S EXTRAORDINARY GAS COST RECOVERY

The Department has no recommendations regarding this section.

⁶⁵ The Department’s recommendations for A.5 and A.6 are conditional. If other interested parties identify additional changes or issues or concerns, the Department reserves the right to modify those recommendations.

Attachments

Title	Description	Topic
DOC-1-C	Department IRs 89-97	MERC's responses to IRs asked in response to 2025 ACF
DOC-2-C	Department IR 98	MERC's response to IR 98 asked in response to extraordinary gas cost recovery

Exhibits

Title	Description	Topic
Exhibit DOC-1-C	Summary of Past and Current Reporting Requirements	Summary of February 17th Order, July 30th Order and June 2nd Order Reporting Requirements



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G011/CI-21-611
Requested From: Joylyn Hoffman-Maleug, MERC
Type of Inquiry: General

Nonpublic Public
Date of Request: 10/27/2025
Response Due: 11/06/2025

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): John Kundert
Email Address(es): john.kundert@state.mn.us
Phone Number(s): 651-539-1740

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 89
Topic: Processes for Providing Protection Against Price Spikes
Reference(s): August 1, 2025, Annual Compliance Filing, page 3

Topic, page: Processes for Providing Protection Against Price Spikes Reference(s): August 1, 2025, Annual Compliance Filing, page 3

Request:

-
1. Has the Company made any significant changes to its processes for providing protection for ratepayers against short-term price spikes over the past 12 months?
 2. If applicable, please provide the rationale for those changes and include estimates of the costs and benefits of that effort to ratepayers.

MERC Response:

1. MERC has continued their processes for providing protection for ratepayers against short-term price spikes, with no significant changes over the past 12 months. Please see MERC's August 1, 2025 Compliance filing in Docket No. G011/CI-21-611, pages 3 – 5 for information on modifications and/or improvements historically made to MERC's gas contracting, purchasing, hedging, storage, peak shaving and other relevant practices, along with practices conducted in the 2025-2026 winter heating season.
2. n/a

To be completed by responder

Response Date: 11/6/2025
Response by: Josh Fieber
Email Address: Joshua.fieber@wecenergygroup.com
Phone Number: 920-433-1805



Docket Number: G011/CI-21-611
Requested From: Joylyn Hoffman-Maleug, MERC
Type of Inquiry: General

Nonpublic Public
Date of Request: 10/27/2025
Response Due: 11/06/2025

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Assigned Analyst(s): John Kundert
Email Address(es): john.kundert@state.mn.us
Phone Number(s): 651-539-1740

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Request Number: 90
Topic: Financial Hedging
Reference(s): August 1, 2025, Annual Compliance Filing, page 4

Request:

1. Has the Company made any significant changes to its processes for hedging some portion of its winter heating season supply using financial instruments over the past 12 months?
2. If applicable, please provide the rationale for those changes and include estimates of the costs and benefits of that effort to ratepayers.

MERC Response:

1. In March 2025, MERC received approval by the Minnesota Public Utilities Commission in Docket No. G011/M-24-388 for extension of rule variances to recover costs of financial instruments through the Purchase Gas Adjustment (PGA). In that filing, MERC provided support in the continuation of using Financial Futures and Financial Calls for up to 30 percent of its total projected heating season sales volume for the combined MERC system each year. Given this was an extension of the previously approved program, MERC has not had any significant changes to its processes for hedging some portion of its winter heating season supply using financial instruments over the past 12 months.

Please see MERC's August 1, 2025 Compliance filing in Docket No. G011/CI-21-611, pages 4 – 5 for information on MERC's hedging practices. Additionally, per the Commission's April 9, 2021 Order in Docket No. G011/M-20-833, MERC provides a full post-mortem analysis of its hedged volumes for the preceding heating season compared to other hedging strategies and the prevailing market prices strategy in each Annual Automatic Adjustment Report filed with the Commission.

2. n/a

To be completed by responder

Response Date: 11/6/2025
Response by: Josh Fieber
Email Address: Joshua.fieber@wecenergygroup.com
Phone Number: 920-433-1805



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G011/CI-21-611

Requested From: Joylyn Hoffman-Maleug, MERC

Type of Inquiry: General

Nonpublic Public

Date of Request: 10/27/2025

Response Due: 11/06/2025

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): John Kundert

Email Address(es): john.kundert@state.mn.us

Phone Number(s): 651-539-1740

ADDITIONAL INSTRUCTIONS:

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Request Number: 91

Topic: Incorporating a Greater Degree of Baseload Purchases

Reference(s): August 1, 2025, Annual Compliance Filing, page 6

Topic: Incorporating a Greater Degree of Baseload Purchases

Request:

1. Has the Company made any significant changes to its processes for incorporating more baseload purchases into its winter season supply over the past 12 months?
2. If applicable, please provide the rationale for those changes and include estimates of the costs and benefits of that effort to ratepayers.

MERC Response:

1. MERC has not made any significant changes to its processes for incorporating more baseload purchases into its winter season supply over the past 12 months. MERC has continued its process of considering and soliciting for products priced off of First of Month (FOM) prices versus daily prices. MERC has maintained its level of baseload purchases in order to not overbuy to MERCs total projected heating season sales volume, but has been successful in contracting for other products priced off of FOM prices versus daily prices. Please see MERC's August 1, 2025 Compliance filing in Docket No. G011/CI-21-611, page 6 per the table, this allowed for MERC to further reduce its exposure to daily prices on a design day.

2. n/a

To be completed by responder

Response Date: 11/6/2025

Response by: Josh Fieber

Email Address: Joshua.fieber@wecenergygroup.com

Phone Number: 920-433-1805

Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G011/CI-21-611
Requested From: Joylyn Hoffman-Maleug, MERC
Type of Inquiry: General

Nonpublic Public
Date of Request: 10/27/2025
Response Due: 11/06/2025

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Assigned Analyst(s): John Kundert
Email Address(es): john.kundert@state.mn.us
Phone Number(s): 651-539-1740

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Request Number: 92
Topic: Modifications to Storage Inventory Management
Reference(s): August 1, 2025, Annual Compliance Filing, page 6

Request:

1. Has the Company made any significant modifications to its storage inventory management processes relative to its winter season supply over the past 12 months?
2. If applicable, please provide the rationale for those changes and include estimates of the costs and benefits of that effort to ratepayers.

MERC Response:

1. MERC has not made any significant modifications to its storage inventory management processes relative to its winter season supply over the past 12 months. Please see MERC's August 1, 2025 Compliance filing in Docket No. G011/CI-21-611, pages 6 – 7 for information on modifications historically made to MERC's storage inventory management processes, along with practices conducted in the 2025-2026 winter heating season.
2. n/a

To be completed by responder

Response Date: 11/6/2025
Response by: Josh Feiber
Email Address: Joshua.fieber@wecenergygroup.com
Phone Number: 920-433-1805



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G011/CI-21-611

Requested From: Joylyn Hoffman-Maleug, MERC

Type of Inquiry: General

Nonpublic Public

Date of Request: 10/27/2025

Response Due: 11/06/2025

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Assigned Analyst(s): John Kundert

Email Address(es): john.kundert@state.mn.us

Phone Number(s): 651-539-1740

ADDITIONAL INSTRUCTIONS:

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Request Number: 93
Topic: Supply Reserve Margin Minimization Processes
Reference(s): August 1, 2025, Annual Compliance Filing, page 6

Request:

1. Has the Company made any significant modifications improvements regarding its efforts to minimize its supply reserve margin over the past 12 months?
2. If applicable, please provide the rationale for those changes and include estimates of the costs and benefits of that effort to ratepayers.

MERC Response:

1. MERC has not made any significant modifications to its supply reserve margin over the past 12 months. Please see MERC's August 1, 2025 Compliance filing in Docket No. G011/CI-21-611, page 7 for information on improvements historically made to MERC's supply reserve margin practices.

2. n/a

To be completed by responder

Response Date: 11/6/2025

Response by: Josh Fieber

Email Address: Joshua.fieber@wecenergygroup.com

Phone Number: 920-433-1805



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G011/CI-21-611

Requested From: Joylyn Hoffman-Maleug, MERC

Type of Inquiry: General

Nonpublic Public

Date of Request: 10/27/2025

Response Due: 11/06/2025

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Assigned Analyst(s): John Kundert

Email Address(es): john.kundert@state.mn.us

Phone Number(s): 651-539-1740

ADDITIONAL INSTRUCTIONS:

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Request Number: 94

Topic: Geographic Diversity of Supply

Reference(s): August 1, 2025, Annual Compliance Filing, page 3-4

Request:

1. Has the Company made any significant changes to its process for increasing the geographic diversity of supply over the past 12 months?
2. If applicable, please provide the rationale for those changes and include estimates of the costs and benefits of that effort to ratepayers.

MERC Response:

1. MERC has not made any significant changes to its process for increasing the geographic diversity of supply over the past 12 months. Consistent with the Commission's February 17, 2023 Order Point 9 language, MERC provides information on supply diversity in its Demand Entitlement dockets. MERC's 2025 Demand Entitlement filings have been made in Docket Nos. G011/M-25-68 and G011/M-25-69.
2. n/a

To be completed by responder

Response Date: 11/6/2025

Response by: Josh Fieber

Email Address: Joshua.fieber@wecenergygroup.com

Phone Number: 920-433-1805



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G011/CI-21-611

Requested From: Joylyn Hoffman-Maleug, MERC

Type of Inquiry: General

Nonpublic Public

Date of Request: 10/27/2025

Response Due: 11/06/2025

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Assigned Analyst(s): John Kundert

Email Address(es): john.kundert@state.mn.us

Phone Number(s): 651-539-1740

ADDITIONAL INSTRUCTIONS:

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Request Number: 95

Topic: Customer Responses to Conservation Calls

Reference(s): August 1, 2025, Annual Compliance Filing, page 8

Request:

1. Has the Company performed any research related to customer responses to conservation calls over the past 12 months?
2. If applicable, please describe those efforts and the effects of the research that has been completed on MERC's various processes and protocols.
3. Is MERC planning to perform additional studies regarding customer responses to conservation calls?
4. If applicable, please describe the goal research.

MERC Response:

1. The Company has not performed any research related to customer responses to conservation calls over the past 12 months.
2. n/a
3. Based on the Company's Gas Price Spike Customer Communications Plan filed in Docket Nos. G999/CI-21-135 and G011/CI-21-611, MERC will conduct customer outreach for conservation during gas price spike events. In the event the Company implements its Gas Price Spike Customer Communications Plan in the future, the Company will review models of our expected gas usage without conservation and compare that to what the actual usage was during a conservation call.
4. This type of study may provide the Company the ability to analyze the impacts of customer reaction to the conservation call, and associated impact on customer usage. If a customer call for conservation should occur, the Company will report our findings in the applicable August 1 compliance filing.

To be completed by responder

Response Date: 11/6/2025

Response by: Joylyn Hoffman Malueg

Email Address: Joylyn.hoffmanmalueg@wecenergygroup.com

Phone Number: 414-221-4208



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G011/CI-21-611

Requested From: Joylyn Hoffman-Maleug, MERC

Type of Inquiry: General

Nonpublic Public

Date of Request: 10/27/2025

Response Due: 11/06/2025

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Email Address(es): john.kundert@state.mn.us

Phone Number(s): 651-539-1740

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Request Number: 96

Topic: Interruptible Customer Curtailment for Reliability and Economic Purposes

Reference(s): August 1, 2025, Annual Compliance Filing, pages 8-9

Request:

1. Has the Company made any significant changes or improvements to its processes for increasing the use of customer curtailments during price spikes into their gas supply planning processes for both reliability and economic purposes over the past 12 months?
2. If applicable, please provide the rationale for those changes and include estimates of the costs and benefits of that effort to ratepayers.

MERC Response:

1. MERC has not made significant changes to its processes for the use of customer curtailments during price spikes events. As explained in MERC's August 1, 2025 Compliance filing in Docket No. G011/CI-21-611, pages 8-9, MERC has an identified process in place that it will continue to use in identifying, and executing, during future price spike events.
2. n/a

To be completed by responder

Response Date: 11/6/2025

Response by: Josh Fieber

Email Address: Joshua.fieber@wecenergygroup.com

Phone Number: 920-433-1805



Minnesota Department of Commerce
 85 7th Place East | Suite 280 | St. Paul, MN 55101
 Information Request

Docket Number: G011/CI-21-611

Requested From: Joylyn Hoffman-Maleug, MERC

Type of Inquiry: General

Nonpublic Public

Date of Request: 10/27/2025

Response Due: 11/06/2025

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): John Kundert

Email Address(es): john.kundert@state.mn.us

Phone Number(s): 651-539-1740

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 97
Topic: Pipeline Capacity Contracts
Reference(s): None

Request:

1. Has the Company made any significant changes or improvements to its processes for using its transportation capacity on interstate or in-state pipelines (gas purchased during the heating season using different contract terms) to mitigate the risk of short-term price spikes over the past 12 months?
2. If applicable, please provide the rationale for those changes and include estimates of the costs and benefits of that effort to ratepayers.

MERC Response:

1. MERC's process is to continuously monitor the pipelines for changes to their tariffs and services which may provide opportunities for improvements that could mitigate impacts of price spikes. To date, there has been no such opportunities. As such, MERC has not made significant changes or improvements to its processes for using its transportation capacity to mitigate the risk of short-term price spikes over the past 12 months. Price spike events typically require near-full capacity utilization of MERC's transportation capacity, and on such days, MERC needs to use the capacity on the specific path, from the primary gate station MERC receives gas, to the primary gate stations it is delivering gas to, to retain its firm rights. This is critical during severe cold events and/or price spike events to maintain reliable delivery of gas.
2. n/a

To be completed by responder

Response Date: 11/6/2025

Response by: Josh Fieber

Email Address: Joshua.fieber@wecenergygroup.com

Phone Number: 920-433-1805



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Assigned Analyst(s): John Kundert

Email Address(es): john.kundert@state.mn.us

Phone Number(s): 651-539-1740

ADDITIONAL INSTRUCTIONS:

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Request Number: 98

Topic: Extraordinary Gas Cost Recovery

Reference(s): *In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions, Docket No. G011/CI-21-611, Order Adopting Settlement Agreement (Oct 19, 2022) Order Point 5. Docket No. G999/AA 24-138, MERC Initial Filing, submitted August 30, 2024.*

Request:

1. Has MERC completely recovered the extraordinary gas costs resulting from approved by the Commission related to Winter Storm Uri?

MERC Response:

1. Yes. As of December 2023, MERC collected \$61,166,064 of the \$61,975,882 extraordinary gas costs via the Commission authorized Severe Weather Cost Recovery surcharge. Per the Commission's October 19, 2022 decision in Docket No. G011/CI-21-611, the difference, an under-collection of \$809,818, was addressed by incorporation into the 2023-2024 Annual Automatic Adjustment ("AAA") Report's gas true-up factor, as filed on August 30, 2024 in Docket No. G999/AA-24-138. The Commission approved MERC's 2023-2024 AAA Report on March 4, 2025. The 2023-2024 AAA Report gas true-up factor was recovered from customers over the time period of September 1, 2024 through August 31, 2025, making recovery of the total \$61,975,882 extraordinary gas costs complete.

To be completed by responder

Response Date: 11/6/2025

Response by: Joylyn Hoffman Malueg

Email Address: Joylyn.hoffmanmalueg@wecenergygroup.com

Phone Number: 414-221-4208

Order	Date	Order Point	Topic/Action	Action	Current Status	MERC Complied?	DOC Comments Citation
February 17th Order	2/17/2023						
		1	Trigger for Economic Curtailment	Denied	Removed in 2025 ACF Order	Not Applicable (NA)	Order Pt. 8 of June 2 Order
		2	Update Existing Interruptible Tariffs	Approved	Removed in 2025 ACF Order	NA	Order Pt. 8 of June 2 Order
		3	14 day compliance filing for high gas prices	Approved	Procedural	NA	Order Pt. 9 of June 2 Order
		4	NAESB - changing force majeure language	Approved	Removed in 2025 ACF Order	NA	Order Pt. 8 of June 2 Order
		5	Price spike mitigation using contracting, hedging, and supply options	Approved	Active	Yes	pages 7-12
		6	Additional Baseload Purchases	Approved	Active	Yes	pages 7-9
		7	Storage Inventory Modifications	Approved	Active	Yes	pages 9-10
		8	Supply Reserve Margin	Approved	Active	Yes	page 10
		9	Supply Diversity	Approved	Active - in Demand Entitlement (DE) filing	See Dockets G011/M-25-68 & G011/25-69	NA
		10	Forecasted Supply Mixes	Approved	Active - but in DE or Planning	See Dockets G011/M-25-68 & G011/ 25-69	NA
		11	Research on Customer Responses to Conservation Calls	Approved	Active	Yes	pages 12-13
		12	CPE-only peak-shaving requirement	Approved	Removed in 2025 ACF Order	NA	NA
		13	Xcel-only peak-shaving requirement.	Approved	Removed in 2025 ACF Order	NA	NA
		14	CPE and Xcel-only requirement economic dispatch/peak-shaving resources	Approved	Not relevant to MERC.	NA	NA
		15	Annual compliance filing requirement	Approved	Procedural	Yes	procedural
		16	Gas IRP process approved for MERC, CPE and Xcel	Approved	Discontinued in 2025 ACF Order	NA	Order Pt. 8 of June 2 Order
		17	Gas IRP budget requirement	Approved	Discontinued in 2025 ACF Order	NA	Order Pt. 8 of June 2 Order
		18	Procedural	Approved	Procedural	Yes	procedural
2023 Compliance	7/30/2024						
		1	Accepting and approving 2023 compliance filings	Approved	Discontinued in 2025 ACF Order	NA	NA
		2	Storage Service Option Evaluations	Approved	Discontinued in 2025 ACF Order	NA	NA
2024 Compliance	6/2/2025						
		1	CenterPoint 2024 ACF	Approved	Not relevant to MERC	NA	NA
		2	Great Plains 2024 ACF	Approved	Not relevant to MERC	Yes	NA
		3	MERC 2024 ACF	Approved	Active	NA	procedural
		4	Xcel 2024 ACF	Approved	Not relevant to MERC	NA	NA
		5	Great Plains report on voluntary conservation	Approved	Not relevant to MERC	NA	NA
		6	Curtailment process improvements for economic and reliability purposes	Approved	Active	Yes	pages 13-14
		7	Interruptible customer compliance with curtailment orders	Approved	Active	Yes	page 14
		8	Identification of Active Reporting Requirements	Approved	Procedural	Yes	See February 17th Order Order Pts. 1-4, 12, 16 and 17 above.
		9	Modification of Reporting Times for Price Spike Event	Approved	Procedural	Yes	procedural
		10	ACF - Still required	Approved	Procedural	Yes	2025 ACF

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. G999/CI-21-135 and G011/CI-21-611

Dated this **8th** day of **December 2025**

/s/Sharon Ferguson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP		50 S 6th St Ste 1500 Minneapolis MN, 55402-1498 United States	Electronic Service		No	21-135Official Service List
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4	Christina	Benning	christina.benning@centerpointenergy.com	CenterPoint Energy Minnesota Gas			Electronic Service		No	21-135Official Service List
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7	Mike	Boughner	michael.l.boughner@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	21-135Official Service List
8	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	21-135Official Service List
9	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	21-135Official Service List
10	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	21-135Official Service List
11	Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
12	Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-135Official Service List
13	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	21-135Official Service List

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15	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	21-135Official Service List
16	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	21-135Official Service List
17	Brian	Edstrom	briane@cupminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	21-135Official Service List
18	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	21-135Official Service List
19	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	21-135Official Service List
20	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	21-135Official Service List
21	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	21-135Official Service List
22	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	21-135Official Service List
23	Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY		401 Nicollet Mall FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	21-135Official Service List
24	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	21-135Official Service List
25	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	21-135Official Service List
26	Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	21-135Official Service List

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28	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	21-135Official Service List
29	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	21-135Official Service List
30	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	21-135Official Service List
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34	Nicole	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-135Official Service List
35	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	21-135Official Service List
36	Annie	Levenson Falk	annief@cbminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	21-135Official Service List
37	Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	21-135Official Service List
38	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	21-135Official Service List
39	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List

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41	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	21-135Official Service List
42	Sarah	Mead	sarah.mead@wecenergygroup.com	MERC		null null, null United States	Electronic Service		No	21-135Official Service List
43	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	21-135Official Service List
44	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	21-135Official Service List
45	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	21-135Official Service List
46	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
47	Stacey	Murphree	stacey.murphree@centerpointenergy.com	CenterPoint Energy Minnesota Gas			Electronic Service		No	21-135Official Service List
48	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
49	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	21-135Official Service List
50	Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	21-135Official Service List
51	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-135Official Service List
52	Lisa	Peterson	lisa.r.peterson@xcelenergy.com			414 Nicollet Mall FL 7 Minneapolis MN, 55401 United States	Electronic Service		No	21-135Official Service List

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53	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	21-135Official Service List
54	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	21-135Official Service List
55	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	21-135Official Service List
56	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
57	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	21-135Official Service List
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59	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	21-135Official Service List
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63	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
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68	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List

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5	Jocelyn	Bremer	jocelyn.bremer@minneapolismn.gov	City of Minneapolis		350 S Fifth St Ste 210 Minneapolis MN, 55415 United States	Electronic Service		No	21-611Official Service List
6	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	21-611Official Service List
7	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	21-611Official Service List
8	Barbara	Case	barbara.case@state.mn.us		Office of Administrative Hearings	600 N. Robert St. St. Paul MN, 55101 United States	Electronic Service		No	21-611Official Service List
9	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	21-611Official Service List
10	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	21-611Official Service List

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12	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	21-611Official Service List
13	Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY		401 Nicollet Mall FL 8 Minneapolis MN, 55401 United States	Electronic Service		Yes	21-611Official Service List
14	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	21-611Official Service List
15	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 United States	Electronic Service		Yes	21-611Official Service List
16	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	21-611Official Service List
17	Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		Yes	21-611Official Service List
18	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	21-611Official Service List
19	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	21-611Official Service List
20	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	21-611Official Service List
21	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	21-611Official Service List

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22	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-611Official Service List
23	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	21-611Official Service List
24	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	21-611Official Service List
25	Lisa	Peterson	lisa.r.peterson@xcelenergy.com			414 Nicollet Mall FL 7 Minneapolis MN, 55401 United States	Electronic Service		No	21-611Official Service List
26	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	21-611Official Service List
27	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	21-611Official Service List
28	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		Yes	21-611Official Service List
29	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	21-611Official Service List
30	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-611Official Service List
31	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	21-611Official Service List
32	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis	Electronic Service		No	21-611Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55402 United States				
33	Michael A.	Yuffee	michael.yuffee@bakerbotts.com	Baker Botts		700 K St NW Washington DC, 20001 United States	Electronic Service		Yes	21-611Official Service List