



**Minnesota Energy Resources**

**An Integrys Energy Group Company**

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May 15, 2015

**VIA ELECTRONIC FILING**

Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
St. Paul, MN 55101

Re: Reply Comments — Minnesota Department of Commerce, Division of Energy Resources Review of 2013-2014 Annual Automatic Adjustment Reports Docket No. G999/AA-14-580 and Natural Gas Utilities' 2013-2014 Purchased Gas Adjustment (PGA) True-Up Filings, Docket Nos. G011/AA-14-754 and G011/AA-14-755

Dear Mr. Wolf:

Minnesota Energy Resources Corporation (MERC or the Company) submits these Reply Comments in response to the Comments filed by the Department of Commerce, Division of Energy Resources (Department) on May 5, 2015.

The Department, in its comments, concluded that MERC-Consolidated's (MERC-CON) and MERC-NNG's FYE14 annual automatic adjustment reports (FYE14 AAA Reports) are complete with respect to Minnesota Rules 7825.2390 through 7825.2920 and recommended that the Commission (1) accept MERC-NNG's true-up filing in Docket No. G011/AA-14-755, (2) allow MERC-NNG to implement its true-up, as shown in Department Attachment G8, (3) accept MERC-Consolidated's true-up filing in Docket No. G011/AA-14-754, (4) allow MERC-Consolidated to implement its true-up, as shown in Department Attachment G9, (5) require MERC to request that its auditor include as part of the true-up audit, the allocations between PGA systems, and (6) require that MERC's future meter testing reports provide the meter testing results on a calendar year basis starting with the year 2014. Additionally, the Department recommended that MERC respond in Reply Comments with its recovery proposals for the GLGT metering and Deer River errors and whether variances are necessary. The Department also requested that all natural gas utilities respond in Reply Comments to certain issues raised in the Department's comments.

MERC appreciates the Department's review and agrees with the Department's recommendations that the Commission (1) accept MERC-NNG's true-up filing in Docket No. G011/AA-14-755, (2) allow MERC-NNG to implement its true-up, as shown in Department Attachment G8, (3) accept MERC-Consolidated's true-up filing in Docket No. G011/AA-14-754, and (4) allow MERC-Consolidated to implement its true-up, as



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shown in Department Attachment G9. MERC responds to each of the Department's other recommendations and requests for additional information below.

### **A. Auditor Review of Cost Allocations**

The Department has recommended that the Commission require that MERC request its auditor include, as part of the true-up audit, the allocations between PGA systems. MERC agrees to request that its auditor review the cost allocations between PGAs for future true-up filings and address any concerns regarding cost-allocations in the audit report to be filed with the AAA report.

### **B. Curtailment Enforcement**

In its comments, the Department raised concern with respect to curtailment enforcement and non-compliance with curtailment orders by interruptible customers. The Department noted that during the unusually cold 2013-2014 winter some interruptible customers repeatedly failed to comply with curtailments. To address this problem, the Department recommended that all utility tariffs contain a provision that allows utilities to discontinue service or revoke a customer's interruptible-class status if the customer habitually fails to comply with curtailments. The Department also recommended that the penalty for non-compliance with curtailments be raised to \$5.00 per therm and be cumulative with incremental costs of non-compliance. The Department requested that the utilities discuss these proposals in Reply Comments and provide discussion on the following questions:

1. What anticipated effects would the above recommended change to tariff language have on the utilities' demand entitlements?
2. When should a utility remove a customer from interruptible service? Immediately? The following November 1? A different date?
3. What notice, if any, is required from the utility to give to a customer before moving the customer to a different rate class? If none is required, how should notice be given?
4. What are the specific triggers for a utility to remove a customer from interruptible service? Unauthorized usage over a pre-determined amount of dekatherms? A percentage of winter sales? Non-compliance with called curtailments more than once?
5. How long would a customer be excluded from interruptible service before it could be reinstated into that rate class?
6. What amount should be charged to be reinstated and what types of costs would be included in the charge?



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As the Department noted in its comments, MERC's tariff sheet No. 8.26 authorizes MERC to disconnect service for willful or continued failure of an interruptible customer to comply with curtailment orders issued by the Company. While MERC would also support a tariff provision to allow the Company to move non-compliant interruptible customers to firm service under appropriate circumstances, such tariff provision would need to provide enough flexibility to allow the Company to evaluate the impacts of transitioning the customer to firm service on a case-by-case basis. The specific circumstances of each case of non-compliance by an interruptible customer would need to be examined and MERC would need to fully evaluate whether sufficient firm capacity would be available to move any particular customer from interruptible to firm service before action could be taken to effectuate the transfer. Additionally, MERC believes that increasing the monetary penalty for non-compliance with curtailment orders to \$5.00 per therm as proposed by the Department would help to drive compliance with curtailment notices.

MERC provides responses to the specific questions raised by the Department below:

### **1. Impact On MERC's Demand Entitlements**

As discussed above, the Department, in its comments, recommended that all utility tariffs have the same provision recently adopted by Xcel Energy, which gives the utilities the right to revoke interruptible customer class status from habitually non-compliant interruptible customers by discontinuing service or moving the customer to firm service. Specifically, Xcel Energy's proposed tariff provision provides:

An interruptible customer's unauthorized use of gas during an interruption is a breach of the terms of service. Xcel Energy reserves the right to discontinue service for such unauthorized use of gas and/or move non-compliant customers to a different rate class. If an interruptible customer's service is reconnected following a breach of service or unauthorized use of gas, the customer will reimburse the company for the cost of reconnection.

The effects of moving non-compliant interruptible customers to firm service would need to be ascertained on a case-by-case basis for purposes of determining potential impacts on MERC's demand entitlements. For instance, the location of the customer and the quantity of natural gas the customer uses would be relevant to determining the demand entitlement impacts. Additionally, the availability of upstream and downstream capacity would be relevant and would need to be evaluated on a case-by-case basis before a customer could be transferred to firm service. Because a case-by-case evaluation would be necessary before a non-compliant interruptible customer could be moved to firm service, MERC believes it is important to allow flexibility in the tariff provision for the Company to evaluate the feasibility of moving the customer to firm service. The tariff language approved for Xcel Energy, which "reserves the right to discontinue service for such unauthorized use of gas and/or move non-compliant



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customers to a different rate class” would provide sufficient discretion for MERC to evaluate each case.

### **2. When Should a Customer be Removed from Interruptible Service?**

The Department recommended that non-compliant interruptible customers be evaluated by the utility after each heating season. The Department also recommended that utilities remove habitually non-compliant customers on the November 1 following the customer’s non-compliance.

While MERC would support the ability to move a customer from interruptible to firm at our discretion and based on a case-by-case review of the practicability of doing so, we could never do it immediately because of the review we would need to undertake in order to determine whether sufficient capacity is available.

### **3. Notice Required to Move a Customer to Another Rate Class**

MERC believes notice to customers is required before a customer may be moved to a different rate class. MERC believes 10-days’ notice to customers prior to moving the customer to another rate class would be sufficient in most cases.

### **4. Triggers to Move Customers to a Different Rate Class**

The Department proposed that an interruptible customer be removed if the customer meets one of two removal requirements. Under the Department’s proposal, an interruptible customer would be removed from interruptible service if the customer exceeded a certain volumetric threshold during a curtailment, or the customer failed to comply with more than one curtailment.

MERC agrees that failure to comply with more than one curtailment should be a trigger for the utility to evaluate moving the customer to a different rate class. As discussed above, the utility would still need to maintain flexibility to determine the feasibility of moving a customer to firm service on a case-by-case basis. The Company believes the Department’s recommendation of using a volumetric threshold as a trigger would be difficult to monitor.

### **5. Length of Exclusion from Interruptible Service**

The Department proposed that customers that are removed from interruptible service be removed for a minimum of one year (November 1 – October 31). MERC believes the length of exclusion from interruptible service would necessarily depend on the circumstances of each customer, and we request flexibility in the timeline of exclusion.



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## **6. Charges for Reinstatement of Interruptible Service**

The Department recommended that as a condition for reinstating interruptible service, the customer should be responsible for all reconnection costs. The Department also stated that, for utilities that require a back-up system as a condition of service, reconnection costs should include the utility's costs for physically inspecting and testing the customer's back-up system.

MERC agrees that a customer who has been disconnected for non-compliance with curtailment orders should be responsible for all reconnection costs, however, MERC does not accept responsibility to inspect and test the customer's back-up fuel system and instead would propose to require customers to provide a certification that their back-up system is operational and sufficient to meet their needs in the event service is interrupted.

### **C. Curtailment Penalties**

The Department stated that to avoid habitual non-compliance with curtailments, the proper incentives needed to be established to encourage compliance with curtailments. Ideally, the Department stated, the costs and penalties for non-compliance would remove any economic incentive to violate a curtailment. The Department concluded that, at a minimum, any penalty needed to ensure that firm customers are made whole. To realize these objectives, the Department proposed that the penalty for non-compliance be \$5.00 per therm plus incremental costs of supplying gas to the non-compliant customer, i.e., delivery charges and, if applicable, pipeline penalties. Specifically, the Department recommended the following tariff language:

If a customer fails to discontinue use of gas when (or within one hour of being) requested to do so, the customer will be deemed to have taken Unauthorized Gas. The penalty for unauthorized use of gas will be: the prevailing delivery charge, plus the highest incremental supply cost for the day, plus \$5.00 per therm.

The Department requested that utilities provide discussion in Reply Comments on the suggested \$5.00 per therm penalty and tariff language.

MERC supports the Department's proposal to increase the penalty to \$5.00 per therm and believes this change would be successful in further reducing unauthorized use of gas during curtailment events. Additionally, while MERC generally agrees with the Department's proposed tariff language, the one-hour time limit may prove difficult to enforce.

### **D. MERC's Transportation-for-Resale Tariff**

The Department also recommended that MERC update its Transportation-for-Resale tariff to clarify that the end-use customers for this service are firm customers and cannot be interrupted. MERC's current Transportation-for-Resale tariff, Sheet No. 6.40,



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provides that “the customer is responsible for purchasing its own entitlement units, e.g., Daily Firm Capacity, etc. The customer is also responsible for overrun penalties, balancing charges, and any out of balance penalties incurred from its transportation of gas by its pipeline suppliers.” The Department suggested the use of “Daily Firm Capacity” in the current tariff language implies that this tariff includes interruptible service and also that the tariff should be revised to specify an entitlement level. MERC proposes to include a request to modify its Transportation-for-Resale tariff in its next rate case to address the concerns raised by the Department. MERC is currently planning to file its next rate case in 2015 and believes a rate case is the most appropriate venue for the Commission to evaluate and approve changes to this tariff.

### **E. Recovery Proposals for GLGT Metering & Deer River Errors**

The Department also analyzed the LUF gas percentages reported by utilities. MERC informed the Department that the Company had identified billing errors that caused the LUF numbers provided in the FYE14 AAA report to be lower than they should have been. Accordingly, MERC revised the Company’s LUF gas calculation for FYE 2014.

The first billing error resulted from a defective flow meter owned by GLGT, which inaccurately measured the amount of gas GLGT supplied to MERC. The second billing error arose because MERC incorrectly assigned approximately 460 gas customer accounts in Deer River to the MERC-NNG PGA that should have been assigned to the MERC-CON PGA. In a November filing, MERC informed the Commission that the Deer River customers would be corrected in MERC’s 2015 true-up.

In the Department’s report, it noted that the Billing Error Rule, Minn. R. 7820.4000, appeared to apply to these billing errors. Accordingly, the Department asked that MERC respond in Reply Comments with recovery proposals for the GLGT metering and Deer River errors. The Department also recommended that MERC state in Reply Comments whether variances to the billing errors rule are necessary. MERC responds as follows:

#### **1. GLGT Metering Error**

After the submittal of its 2014 true-up reports, MERC was notified by GLGT in early September 2014 that their meter at the Grand Rapids, Minnesota, Town Border Station (“TBS”) was incorrectly measuring natural gas flow. GLGT calculated an adjustment amount of 163,143 Dths for the time period of February 2014 through July 2014. GLGT corrected the measurement error by adjusting the balancing volume MERC owed to GLGT by 163,143 Dths on the August 2014 Balancing Statement issued to MERC. MERC treated this imbalance amount owed to GLGT as it treats other imbalances on the GLGT pipeline by adjusting pipeline nominations in future months. In other words, MERC adjusted future nominations downward to adjust for the increased imbalance amount of 163,143 Dths caused by GLGT’s faulty TBS meter. The GLGT metering error only affected MERC-CON PGA system customers. MERC was temporarily not charged for this amount of gas until GLGT issued an invoice to MERC in



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September 2014 that included the 163,143 Dths of “unmetered” gas in the August 2014 month-end imbalance amount. The August 2014 adjusted month-end imbalance amount was included in MERC-CON PGA system August 2014 monthly gas costs and will be accounted for as such in MERC’s 2015 annual true-up.

Minnesota Rule 7820.4000, the Natural Gas Utility Billing Errors Rule, requires that when a customer has been undercharged as a result of incorrect reading of the meter, incorrect application of a rate schedule, incorrect connection of the meter, application of an incorrect multiplier or constant, or other similar reasons, the utility shall calculate the difference between the amount collected for service rendered and the amount the utility should have collected for the period beginning one year before the date of discovery. If the recalculated bills indicate that the amount due the utility exceeds \$10, the utility may bill the customer for the amount due. Because the error was made by GLGT and MERC properly passed through the charged natural gas costs to customers, there is no *billing* error that would require a variance from the natural gas billing error rules, Minn. R. 7820.4000.

Nevertheless, if the Commission believes a variance to Minn. R. 7820.4000 or Minn. R. 7825.2700 is required in order to correct the error through the 2015 true-up, MERC meets the requirements for a variance in order to account for this error in the 2015 true-up. Minnesota Rule 7829.3200 provides that the Commission shall grant a variance to its rules when it determines that the following requirements are met:

- A. Enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule;
- B. Granting the variance would not adversely affect the public interest; and
- C. Granting the variance would not conflict with standards imposed by law.

All of these requirements are met here. First, to the extent strict enforcement would be inconsistent with MERC’s proposal as outlined above, such enforcement of the applicable rules would impose an excessive burden on MERC and would require MERC to incur significant and unreasonable costs. Second, the public interest would not be adversely affected by granting the variance. To the contrary, granting the variance would benefit the public interest by correcting an error and correctly assigning costs to MERC’s customers. Finally, MERC is not aware of any legal standards that would be violated by granting a variance in this case.

## 2. Deer River PGA System Assignment Error

After the submittal of its 2014 true-up reports, MERC discovered that approximately 460 gas customer accounts in the Deer River, MN area were incorrectly assigned to the MERC-NNG PGA system from July 2013 to October 2014. Customers in the Deer River area were incorrectly billed MERC-NNG PGA system monthly gas cost rate factors but should have been billed MERC-CON PGA system gas cost rate factors. The incorrect assignment of PGA systems caused these customers in Deer River to be over charged for the cost of gas. This also caused revenues associated with



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approximately 843,100 therms of gas to be incorrectly included in the 2014 annual true-up for the MERC-NNG PGA system. Conversely, the error caused the revenues associated with the approximately 843,100 therms of gas to be incorrectly excluded from the 2014 annual true-up for the MERC-CON PGA system.

MERC issued refunds, via a credit on April 2015 customer bills, to MERC customers in the Deer River area that had been over charged for the cost of gas. The total amount of the refunds issued, inclusive of interest pursuant to the Natural Gas Utility Billing Errors Rule (Minn. R. 7820.4000), was approximately \$81,000. Because the process used to refund Deer River customers complied with the requirements of the Natural Gas Utility Billing Errors Rule, Minn. R. 7820.4000, no variance from that rule was necessary to complete the refund.

Additionally, MERC proposes to correct the overstatement of gas cost revenues applied to the MERC-NNG PGA system and the understatement of gas cost revenues applied to the MERC-CON PGA system in MERC's 2014 annual true-up by adjusting the FYE15 true-up beginning balances used in the calculation of the FYE15 Gas Cost True-up Factors as follows:

- MERC-NNG General Service (GS): An amount of \$487,878.99 will be added to the“(Over)/Under Recovery to be (Credited)/Surcharged” amount reported on line 7, page 1 of 3, in the 2013-2014 MERC-NNG annual true-up report and entered as “2013-2014 Gas Costs to be Recovered” amount on line 1, page 1 of 3, in the upcoming September 2015 filing of the MERC-NNG annual true-up report.
- MERC-NNG Interruptible/Joint Commodity (SVI/LVI): An amount of \$39,645.12 will be added to the“(Over)/Under Recovery to be (Credited)/Surcharged” amount reported on line 7, page 1 of 3, in the 2013-2014 MERC-NNG annual true-up report and entered as “2013-2014 Gas Costs to be Recovered” amount on line 1, page 1 of 3, in the upcoming September 2015 filing of the MERC-NNG annual true-up report.
- MERC-CON General Service (GS): An amount of (\$407,178.83) will be added to the“(Over)/Under Recovery to be (Credited)/Surcharged” amount reported on line 7, page 1 of 3, in the 2013-2014 MERC-CON annual true-up report and entered as “2013-2014 Gas Costs to be Recovered” amount on line 1, page 1 of 3, in the upcoming September 2015 filing of the MERC-CON annual true-up report.
- MERC-CON Interruptible/Joint Commodity (SVI/LVI): An amount of (\$39,452.91) will be added to the“(Over)/Under Recovery to be (Credited)/Surcharged” amount reported on line 7, page 1 of 3, in the 2013-2014 MERC-CON annual true-up report and entered as “2013-2014 Gas Costs to be Recovered” amount on line 1, page 1 of 3, in the upcoming September 2015 filing of the MERC-CON annual true-up report.

This proposal likely will require a variance from Minnesota Rule 7825.2700, Subpart 7, which requires that a true-up address only costs and credits arising within the





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relevant reporting year. MERC meets the requirements for a variance from this rule in order to adjust its FYE15 true-up beginning balances as described above. As noted above, Minnesota Rule 7929.3200 provides that the Commission shall grant a variance to its rules when it determines that the following requirements are met:

- A. Enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule;
- B. Granting the variance would not adversely affect the public interest; and
- C. Granting the variance would not conflict with standards imposed by law.

All of these requirements are met here. First, strict enforcement of Rule 7825.2700 would burden MERC's customers because there would be an incorrect assignment of revenues such that customers would not be paying the correct gas cost charges. Further, it would not be practicable to make the correction in the current true-up period. The proposal outlined above is also more transparent because all corrections will be included in the true-up. Second, the public interest would not be adversely affected by granting the variance. To the contrary, granting the variance would benefit the public interest by correcting an error in assignment of revenues. Finally, MERC is not aware of any legal standards that would be violated by granting a variance in this case.

### **F. Reporting Contractor Main Strikes and Meter Testing**

In its comments, the Department also recommended that the Commission require that all the utilities total the gas costs in its report and also provide the allocation of the gas costs credited to each class in its true up of commodity costs. MERC does not object to that recommendation.

Regarding meter testing, MERC stated:

MERC has made one change to the timing of its meter testing program that has affected the number of meters tested during the AAA period. During this period MERC tested 876 meters as part of its meter testing program. Of those meters tested 816 (93%) tested between 98% and 102% accurate which is within the range of acceptable accuracy, 42 meters (4%) tested greater than 102% accurate, 14 meters (2%) tested less than 98% accurate and 4 meters (less than 1%) had no test due to the meter being damaged. In last year's AAA, MERC reported a total of 2,292 meters tested. The difference in total number of meters tested is attributable to the fact that MERC tested a substantial amount of meters in the first half of 2013. This year, however, we shifted our timing so that our tests for March through July are currently underway. We have made no other modifications to the meter testing program and we expect to test the same number of meters (approximately) in the calendar year 2014 as 2013, but we are not able to provide the results of those tests in this AAA period.



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In its comments, the Department indicated that while it did not object to MERC's change in the timing of the meter tests, it recommended that the Commission require MERC's future meter testing reports to provide the meter testing results on a calendar-year basis starting with year 2014. MERC agrees to provide future meter testing results on a calendar-year basis.

**G. Hedging**

Regarding hedging, the Department, in its analysis, concluded accomplished its intended purpose of providing reasonable price protection on a portion of its winter gas supplies, based on the information the company had at the time it executed its hedges. The Department recommends that each utility that hedges (including physical and financial) continue to provide a post-mortem analysis, in a format similar to what was provided in this docket, in subsequent AAA filings. MERC agrees that it will continue to provide a post-mortem analysis, in a format similar to what was provided in this docket, in subsequent AAA filings.

Please contact me at (651) 322-8965 if you have any questions.

Sincerely,

/s/ Amber S. Lee

Amber S. Lee  
Regulatory and Legislative Affairs Manager  
Minnesota Energy Resources Corporation

AFFIDAVIT OF SERVICE

STATE OF MINNESOTA            )  
  ) ss  
COUNTY OF HENNEPIN        )

Kristin M. Stastny hereby certifies that on the 15th day of May, 2015, on behalf of Minnesota Energy Resources Corporation (MERC) she electronically filed a true and correct copy of the attached Reply Comments on [www.edockets.state.mn.us](http://www.edockets.state.mn.us). Said documents were also served via U.S. mail and electronic service as designated on the attached service list.

/s/ Kristin M. Stastny  
Kristin M. Stastny

Subscribed and sworn to before me  
This 15th Day of May, 2015.

/s/ Alice Jaworski  
Notary Public, State of Minnesota

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