

MICHAEL J. AHERN
(612) 340-2881
FAX (612) 340-2643
ahern.michael@dorsey.com

November 1, 2012

VIA ELECTRONIC FILING

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101

Re: In the Matter of the Petition of Minnesota Energy Resources Corporation
(MERC)–PNG for Approval of a Change in Demand Entitlement for its Great
Lakes Gas Transmission (GLGT) System;
Docket No. G011/M-12-____

Dear Dr. Haar:

In accordance with Minnesota Rule 7825.2910, subpart 2, please find the public and nonpublic versions of Minnesota Energy Resources Corporation's (MERC) request to change demand entitlement.

Please note that Attachments 5 and 9 contain financial information with independent economic value that is not generally known to, and not readily ascertainable by, competitors of MERC, who could obtain economic value from its disclosure. MERC maintains this information as secret. Accordingly this data qualifies as trade secret data as defined in Minn. Stat. § 13.37, subd. 1(b), and MERC requests that the data be treated as trade secret information.

In accordance with Minnesota Rule 7825.2910, subpart 3, a Notice of Availability has been sent to all intervenors in the Company's previous two rate cases.

Please feel free to contact me at (612) 340-2881 if you have any questions regarding this matter.

Sincerely yours,

/s/ Michael J. Ahern

Michael J. Ahern

cc: Service List

November 1, 2012

To: Service List

RE: Minnesota Energy Resources Corporation-PNG Petition for Approval of Change in Demand Entitlement

Notice of Availability

Please take notice that Minnesota Energy Resources Corporation-PNG has filed a petition with the Minnesota Public Utilities Commission for approval of a change in demand entitlement.

To obtain copies, or if you have any questions, please contact:

Gregory J. Walters
Minnesota Energy Resources Corporation
3460 Technology Drive NW
Rochester, MN 55901
507-529-5100.

Please note that this filing is also available through the eDockets system maintained by the Minnesota Department of Commerce and the Minnesota Public Utilities Commission. You can access this document by going to eDockets through the websites of the Department of Commerce or the Public Utilities Commission or going to the eDockets homepage at:

<https://www.edockets.state.mn.us/EFiling/home.jsp>

Once on the eDockets homepage, this document can be accessed through the Search Documents link and by entering the date of the filing.

STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger
J. Dennis O'Brien
David C. Boyd
Phyllis A. Reha
Betsy Wergin

Chair
Commissioner
Commissioner
Commissioner
Commissioner

In the Matter of the Petition of Minnesota)
Energy Resources Corporation – PNG)
for Approval of a Change in Demand)
Entitlement for its Great Lakes Gas)
Transmission System)

Docket No. _____

SUMMARY OF FILING

Pursuant to Minnesota Rule 7825.2910, subpart 2 (Filing Upon Change in Demand), Minnesota Energy Resources Corporation-PNG (MERC or the Company), hereby petitions the Minnesota Public Utilities Commission (Commission) for approval of changes in demand entitlements for MERC-PNG's customers served off of the Great Lakes Gas Transmission (GLGT) System. MERC requests that the Commission approve the requested changes to be recovered in the Purchased Gas Adjustment (PGA) effective on November 1, 2012.

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| | | |
|--|---|------------------|
| In the Matter of the Petition of Minnesota |) | |
| Energy Resources Corporation – PNG |) | |
| for Approval of a Change in Demand |) | Docket No. _____ |
| Entitlement for its Great Lakes Gas |) | |
| Transmission System |) | |

FILING UPON CHANGE IN DEMAND

Pursuant to Minnesota Rule 7825.2910, subpart 2 (Filing Upon Change in Demand), Minnesota Energy Resources Corporation-PNG (MERC or the Company), hereby petitions the Minnesota Public Utilities Commission (Commission) for approval of changes in demand entitlements for MERC-PNG's customers served off of the Great Lakes Gas Transmission (GLGT) system. MERC requests that the Commission approve the requested changes to be recovered in the Purchased Gas Adjustment (PGA) effective on November 1, 2012.

This filing includes the following attachments:

- | | |
|----------------------|---|
| Attachment 1: | Notice of Availability. |
| Attachment 2: | One paragraph summary of the filing in accordance with Minn. R. 7829.1300, subp. 1. |
| Attachment 3: | Petition for Change in Demand with Attachments. |
| Attachment 4: | Affidavit of Service and Service List. |

The following information is provided in accordance with Minn. R. 7829.1300:

1. Summary of Filing

Pursuant to Minn. R. 7829.1300, subp. 1, a one-paragraph summary of the filing is attached.

2. Service

Pursuant to Minn. R. 7829.1300, subp. 2, MERC has served a copy of this filing on the Department of Commerce and the Office of the Attorney General – Residential Utilities Division. The summary of the filing has been served on all parties on the attached service list. Additionally, pursuant to Minn. R. 7825.2910, subp. 3, a Notice of Availability has been sent to all intervenors in the Company's previous two rate cases.

3. General Filing Information

A. Name, Address, and Telephone Number of the Utility

Minnesota Energy Resources Corporation
2665 145th Street West
Box 455
Rosemount, MN 55068-0455
(651) 322-8901

B. Name, Address, and Telephone Number of Attorney for the Utility

Michael J. Ahern
Dorsey & Whitney LLP
50 S. Sixth Street, Suite 1500
Minneapolis, MN 55402-1498
(612) 340-2881

C. Date of the Filing and Proposed Effective Date

Date of filing: November 1, 2012
Proposed Effective Date: November 1, 2012

D. Statute Controlling Schedule for Processing the Filing

Minnesota Statutes and related rules do not provide an explicit time frame for action by the Commission. Under Minn. R. 7829.1400, initial comments are due within 30 days of filing, with reply comments due 10 days thereafter.

E. Utility Employee Responsible for the Filing

Gregory J. Walters
3460 Technology Drive NW
Rochester, MN 55901
(507) 529-5100

If additional information is required, please contact Michael J. Ahern at: (612) 340-2881.

DATED: November 1, 2012

Respectfully Submitted,

DORSEY & WHITNEY LLP

By: /s/ Michael J. Ahern

Michael J. Ahern
Suite 1500, 50 South Sixth Street
Minneapolis, MN 55402-1498
Telephone: (612) 340-2600

Attorney for Minnesota Energy
Resources Corporation

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger
J. Dennis O'Brien
David C. Boyd
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Chair
Commissioner
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Commissioner

In the Matter of the Petition of Minnesota)
Energy Resources Corporation – PNG)
for Approval of a Change in Demand) Docket No. _____
Entitlement for its Great Lakes Gas)
Transmission System)

PETITION FOR CHANGE IN DEMAND

I. INTRODUCTION

Pursuant to Minnesota Rule 7825.2910, subpart 2 (Filing Upon Change in Demand), Minnesota Energy Resources Corporation - PNG (MERC or the Company), a division of Integrys Energy Group, Inc. (TEG), hereby petitions the Minnesota Public Utilities Commission (Commission) for approval of changes in demand entitlements for MERC-PNG's customers served off of the Great Lakes Gas Transmission (GLGT or Great Lakes) system. MERC requests that the Commission approve the requested changes to be recovered in the Purchased Gas Adjustment (PGA) effective on November 1, 2012.

II. DISCUSSION

A. MERC's PNG-GLGT Design Day Requirements

MERC's 2012-2013 PNG-GLGT design day requirements increased 699 Mcf (or approximately 7.51 percent) from 9,304 Mcf to 10,003 Mcf.

**Table 1: MERC's Proposed Reserve Margins
For the 2012-2013 Heating Season
GLGT PNG**

| | Reserve Margin 2012-2013 Heating Season | Reserve Margin 2011-2012 Heating Season | Change |
|----------|---|---|--------|
| GLGT-PNG | 2.09% | 9.08% | -6.99% |

As shown in Table 1 and Attachment 3, MERC's proposed system wide reserve margin for PNG-GLGT for the 2012-2013 heating season is positive.

For the Demand Entitlement filing effective November 1, 2012, the total Design Day requirement for PNG-GLGT is 10,003 Dth as calculated in Attachment 1, page 2 and Attachment 3.

For the Demand Entitlement filing effective November 1, 2012, the total Design Day capacity for PNG-GLGT, is 10,212 Dth as calculated in Attachment 3.

The difference between the total Design Day requirement and total Design Day capacity results in a 2.09% positive reserve margin.

B. Forecast Methodology for MERC Demand Entitlement Nov. 1, 2012

Peakday

Purpose

Gather data and perform analysis used in the "Petition for Change in Demand" for Minnesota Energy Resources Corporation – PNG and Minnesota Energy Resources Corporation – NMU for "Approval of a Change in Demand Entitlement" to be sent to the Minnesota Public Utilities Commission, otherwise known as the "MERC Demand Entitlement Filings".

Background

MERC is composed of two service areas:

1. PNG - Peoples Natural Gas
2. NMU - Northern Minnesota Utility

Which are served by four pipelines:

3. VGT - Viking Gas Transmission system (serves both PNG and NMU)
4. NNG- Northern Natural Gas pipeline (serves both PNG and NMU)
5. GLGT - Great Lakes Gas Transmission pipeline (serves both PNG and NMU)
6. Centra - Centra pipeline (serves NMU)

Four Petitions for Change in Demand are filed (one for each of PGA):

- A. PNG customers served off of VGT = PNG-VGT
- B. PNG customers served off of GLGT = PNG-GLGT
- C. PNG customers served off of NNG = PNG-NNG
- D. All NMU customers - served off NNG, GLGT, VGT & Centra = NMU

Weather data is obtained from the following weather stations:

1. International Falls
2. Bemidji
3. Cloquet
4. Fargo
5. Minneapolis
6. Rochester
7. Worthington
8. Ortonville

For analytical purposes, data is subdivided, analyzed and regressed by the following demand areas:

| | Demand Area (Service Area / Pipeline) | PGAC | Weather Station(s) |
|----|--|-------------|--|
| 1 | NMU-Centra | NMU | International Falls |
| 2 | NMU-GLGT * | NMU | Bemidji & Cloquet |
| 3 | NMU-NNG | NMU | Cloquet |
| 4 | NMU-VGT * | NMU | Fargo |
| 5 | NMU-GLGT&VGT* | NMU | Bemidji |
| 6 | PNG-GLGT | PNG-GLGT | Bemidji |
| 7a | PNG-NNG – All except Ortonville | PNG-NNG | Minneapolis, Rochester, Cloquet & Worthington |
| 7b | PNG-NNG – Ortonville Only | PNG-NNG | Ortonville |
| 8 | PNG-VGT | PNG-VGT | Fargo |

* Thief River Falls is included only in NMU-GLGT&VGT

Analytical Approach

Summary

1. Obtain daily weather data for each weather station as shown in Attachment 13
2. Obtain daily total throughput volumes by pipeline
3. Perform total throughput peak day regressions
4. Subtract interruptible, transport, and joint interruptible expected peak day load volumes based on monthly billing data
5. Add back Daily Firm Capacity (DFC) customer selections
6. Apply sales forecast growth rates

Detail

The Peak Day Forecasting Team (the Team) followed a data-driven approach for the MERC Peak Day Forecast. Since the forecast is for a peak day, the best daily data available is required to provide the best estimate. Theoretically, the peak day regression should be performed using daily net firm load by service area, pipeline, and weather station. A review of the data available indicated that the two best daily data sources are the daily weather data by weather station and the daily throughput data by Town Border Station (TBS) and pipeline meter. (Some pipeline meters are dedicated to a TBS, and some are dedicated to individual customers.)

Most of the interruptible, transportation, and joint interruptible data available is from monthly billing record excerpts provided by ADS/Vertex, an external vendor that has been providing billing services to MERC-PNG and MERC-NMU.

The Team followed an approach generally consistent with the one used last year that would:

- Make the best use of the best available data; and
- Isolate the effects the monthly billing cycle data has on the Peak Day forecast so that the new process can be easily updated as better data is available.

The Peak Day Process consisted of:

- I. Data Preparation
- II. Regression Generation of Net Daily Metered Volumes
- III. Volume Risk Adjustments
- IV. Adjusting the Regression Results to a Firm peak day estimate

I. The **Data Preparation** Steps consisted of:

- Identify the coldest Adjusted Heating Degree Day (AHDD65) in the last 20 years for each weather station.
- Determine the most recent three years of December through February daily total metered throughput for each of the demand areas by weather station.
- Subtract the daily pipeline meter readings for all non-firm customers with daily pipeline meter readings available for all three December through February years from the total throughput for each demand area and weather station. Use the resulting net daily metered volumes for regressions. Examples of non-firm customer meter readings subtracted from the demand area total daily throughputs are paper mills, direct-connects, taconites, and off-system end users. (See “Adjusting the Regression Results to a Firm Peak Day Estimate” below.)
- Determine how to map the monthly billing data to the demand areas.

Each daily weather station data file was searched to find the coldest Adjusted Heating Degree Day (AHDD65) in the last 20 years. This 1-in-20 approach is consistent with prior years. The results are provided in the following table:

| <u>Station</u> | <u>Date</u> | <u>Avg. Temp</u> | <u>Avg. Wind</u> | <u>HDD65</u> | <u>AHDD65</u> |
|------------------------|-------------|----------------------|----------------------|--------------|---------------|
| Bemidji | 2/1/1996 | -34 | 8 | 99 | 107 |
| Cloquet | 2/2/1996 | -31 | 7 | 96 | 103 |
| Fargo | 1/18/1996 | -16 | 34 | 81 | 109 |
| International Falls | 2/2/1996 | -34 | 8 | 99 | 107 |
| Minneapolis | 2/2/1996 | -25 | 8 | 90 | 97 |
| Rochester | 2/2/1996 | -27 | 10 | 92 | 101 |
| Worthington | 1/18/1996 | -8 | 32 | 73 | 96 |
| Ortonville | 1/14/2009 | -21 | 11 | 86 | 96 |

The daily throughput data was provided by pipeline and meter, with each meter on each pipeline mapped to one of the weather stations shown in the above chart. Each meter was also designated as either PNG or NMU. As noted above, some of the meters represented a TBS. Some meters were dedicated to a customer who is not a firm service customer of either PNG or NMU. For example, certain transportation, interruptible, direct-connect, and taconite customers have their own meter, but are not counted as firm service customers.

In a more nearly ideal world, the Team would have also had daily telemetered data from each interruptible, transportation, and joint interruptible customer mapped to each of the demand areas and related weather stations. This was the case for a handful of paper mills, direct-connects, taconites, and off-system end users. The rest of the interruptible, transportation, and joint interruptible data was available based on monthly billing cycle data that introduces billing lag, meter read lag (not all meters were read every month, resulting in billing cycle estimates and reversals), and other potential errors into their volumes.

Similar to the process used the prior year, the Team generated regressions of the daily throughput data available less the known daily meter readings for non-firm customers and adjusted those regressions for the estimated peak day impact of the other non-firm customers who do not have daily readings. This approach was used because it introduced much less error into the data and regressions than trying to guess how to allocate monthly billing cycle data to daily when the load factors and relative temperature sensitivity of the non-daily-metered customers was not known. Using only the daily metered data for the regressions makes the best use of the best data available and provides insights into the total daily metered load that could be active on a peak day even if supply access at the non-firm pipeline meters were shut off.

II. The **Regression Generation of Net Daily Metered Volumes** consisted of:

- For each of the Demand Areas (Service Area / Pipeline):
 1. Gather the net daily metered volumes and weather station data including AHDD65.¹
 2. If more than one weather station is represented in a given demand area, weight each weather station's AHDD65 by the total December through February metered volumes attributable to that weather station.
 3. Add indicator variables for day-type and month. Day-type variables are used to isolate load that changes by day of the week, such as commercial or industrial customers who may change their consumption on weekends when they run fewer

¹ Temperature and weather data was obtained from Weather Bank/DTN via TherMaxx then converted to HDD65 and AHDD65 in an Excel spreadsheet by MERC – Gas Supply. Temperature and wind data is 24-hour average based on the 9am to 9am gas day.

shifts. Month indicator variables are used to isolate load that changes based on winter month, such as businesses that are open extra hours in December and resume normal operating hours in January.

4. Perform ordinary least squares linear regressions for the 3-year time frame using the AHDD65 weather variable and the significant indicator variables.
5. Summarize the Baseload and Use/AHDD65 from each regression.
6. Calculate a point estimate from each regression based on the baseload value plus the Use/AHDD65 coefficient times the coldest AHDD65 in 20 years (volume weighted if using more than one weather station in a single Demand Area).

III. Volume Risk Adjustments

Volume risk adjustments were incorporated into the forecast to provide a confidence level that the daily metered load under design conditions would not exceed the daily metered regression estimate. An appropriate volume risk adjustment was determined for each regression group by multiplying the standard error of each regression analysis (sigma) by a factor needed to attain a desired confidence level. The desired confidence level chosen was 97.5%.

IV. Adjusting the Regression Results to a Firm Peak Day Estimate consisted of:

A. Subtract interruptible, transport, and joint interruptible expected peak day load volumes based on monthly billing data

In order to determine firm peak day load, volumes contained in the daily pipeline meter readings for interruptible, joint interruptible and transportation customers needed to be isolated and removed. While it would have been ideal to have daily billing data for all customers, most

of the interruptible, transportation, and joint interruptible data was, in most cases, only available from monthly billing records². An unfortunate, but unavoidable consequence was that this data was based on monthly billing cycles that introduce billing lag, meter read lag (not all meters were read every month, resulting in billing cycle estimates and reversals), and other potential errors into their volumes.

A database of volumes billed for all customers from the prior winter was obtained. The database contained detail by customer class³, calendar month, (service) area, city, location, zip code and responsibility center. The billing database was provided by ADS/Vertex, an outside firm that has been providing billing services to MERC. Sales and Revenue Forecasting had previously adjusted the billing data to properly fit the appropriate calendar month of consumption by apportioning billed volumes, i.e., for a bill covering February 15 to March 15, volumes were split evenly between February and March.

Volumes for the interruptible, transportation and joint interruptible customer classes (INTER, TRANS and JINTER classes) needed to be mapped to the appropriate regression demand area, and were then summed. This billing data included consumption that was billed, but not included in the daily metered volumes for several large specific customers (paper mills, direct-connects, taconites, and off-system end users), and therefore needed to be removed from the gross interruptible, transportation and joint interruptible totals. Such customers were identified, mapped to the demand areas, summed and subtracted from the interruptible, transportation and joint interruptible customer classes totals. The following peak demand estimation method based

² Individual daily volumes were available for a handful of paper mills, direct-connects, taconites, and off-system end users.

³ Transportation, Interruptible, Joint Interruptible, Residential, Large Commercial & Industrial and Small Commercial & Industrial.

on the highest monthly total from the prior winter was then used to calculate the amount to subtract from the results of the data regressions for each demand area:

The MERC-PNG and MERC-NMU tariff General Rules, Regulations, Terms, and Conditions
Section 1.N “Maximum Daily Quantity (MDQ)” on 1st Revised Sheet No. 8.04:

N. Maximum Daily Quantity (MDQ):

The amount calculated by dividing the volumes consumed by a particular customer during the highest historical peak month of usage for that customer by twenty (20).

Company will estimate a peak month for new customers. A Maximum Daily Quantity may also be established through direct measurement or other means (i.e. estimating the peak day requirements after installation of new processing equipment or more energy efficient heating systems) if approved by [the] Company.

B. Add back Daily Firm Capacity (DFC) customer selections

While interruptible, joint interruptible and transportation customer volumes were removed (as described above), in order to determine firm peak day load, daily firm capacity selections needed to be added back. The Sales and Revenue Forecasting department provided historical monthly DFC data for the “joint interruptible” customers from the prior winter that showed the volume that each customer has selected to receive as firm service from MERC each month. Based on direction from MERC Gas Supply, the Small Volume Joint Firm / Interruptible customers who were relying on MERC to provide peak day firm supply were identified and their the daily firm capacity volumes were summed by month for each demand area. The total volumes were then added back to the adjusted regression results.

C. Apply Sales Forecast Growth Rates

The throughput volumes used in the data regressions were from the last three winters and needed to be adjusted to properly forecast the next year. The Revenue Forecasting Department provided a growth rate for each demand area, which were then applied to the adjusted regression results.

Demand Area / (Service Area / Pipeline) Regression Notes

A. Interruptible, Transportation and Joint Interruptible

NMU-GLGT = Paper Mills

NMU-VGT = Lamb Weston

PNG-NNG = Taconites / Direct Connects

PNG-NNG = OSEU (End Users)

B. Daily Firm Capacity

PNG-VGT

PNG-GLGT

PNG-NNG

Daily Design Day Estimate to Actual Comparison

In the 2007 demand entitlement dockets, MERC agreed to include a daily estimate utilizing the design day model which is calculated in Attachment 10. The daily estimate is compared to actual consumption. The actual volumes are total through-put which includes

interruptible and transportation volumes that are located behind MERC citygates. This does not include any transportation volumes that are directly connected with NNG pipeline. The Design Day model only calculates firm volumes. MERC does not forecast on a daily/monthly basis utilizing the Design Day model. The Design Day model is utilized to calculate the theoretical peak day. The calculated base load natural gas usage at zero heating degree days is 379 Dth which includes interruptible and transportation volumes. Since daily volume consumption is not available for all interruptible and transportation customers, MERC is not able to determine an exact number to deduct from the 379 Dth to determine the firm base load natural gas consumption at zero (0) HDD.

Average Customer Counts

In the 2007 demand entitlement dockets, MERC agreed to include average customer counts which is provided in Attachment 11.

C. MERC's Specific GLGT Proposed Demand-Related Changes

There are two types of demand entitlement changes. The first type is design day deliverability, which, in this case, MERC is proposing no change in the firm transportation capacity actually available to MERC-PNG-GLGT customers during winter peak periods. The second type does not affect design day deliverability levels, but alters the capacity portfolio and the PGA costs recovered from customers.

1. Design Day Deliverability Changes

As shown in Attachment 6, MERC-PNG-GLGT proposes an increase of 63 Dth in design day deliverability for the upcoming heating season.

2. Other Demand Entitlement Changes

PNG-GLGT contracts and utilizes natural gas supplies from AECO Storage. To deliver the supply from storage to MERC-NMU's markets, MERC entered in an AECO/Emerson swap. MERC sells gas at the storage point (AECO) to a supplier and MERC buys an equivalent volume at Emerson/Spruce, which MERC then transports to its PNG-GLGT, PNG-VGT and NMU (GLGT, VGT and Centra) customers. The swap alleviated the need to contract for firm transport on TransCanada Pipeline (TCPL) to transport the gas from AECO to Emerson/Spruce.

D. Financial Option Units and Premiums

- i. MERC entered into New York Mercantile Exchange (NYMEX) financial Call Options for the upcoming 2012-2013 winter (November through March). Please see Attachment 5.
- ii. Total premium cost to enter into the financial Call Options on behalf of MERC's firm customers amounted to \$46,103 for the 2012-2013 winter. Please see Attachment 5.
- iii. MERC entered into 20 contracts (10,000/contract) or 200,000. Total premium per contract is approximately \$0.2305. Please see Attachment 5.
- iv. Please see Attachment 5 for the various contract dates.
- v. Please see Attachment 5 for the various contract prices.
- vi. MERC entered into 16 futures contracts (10,000/contract) or 160,000.
- vii. MERC believes a diversified portfolio approach towards hedging is in the best interest of MERC's firm customers. MERC implemented a 40%

fixed price (storage and futures contracts), 30% financial call options and 30% market based prices, assuming normal weather. A dollar-cost-averaging approach is utilized in purchasing the hedging portfolio.

Although this hedging strategy will most likely not provide the lowest priced supply, it does meet MERC's stated objectives of providing reliable and reasonably priced natural gas and mitigates natural gas price volatility.

Please see Attachment 9, page 1 of 2.

E. Gas Supply.

The PNG-GLGT 2012-2013 Winter Portfolio Plan - Minnesota Energy Resources Corporation for GLGT gas supply purchases for the Hedging Plan is in Attachment 9, page 2. This Attachment includes the projected sales number by month for the November 2012 through March 2013 period as well as the planned physical fixed price, financial call options and storage and/or exchange volumes by month.

F. Price Volatility

MERC's hedging strategy as described in section 2.(D).(vii.) provides the opportunity to ensure MERC customers are seventy percent (70%) hedged assuming normal winter volumes. The 70% hedged is accomplished by 40% of normal winter volumes hedged by a fixed price, which is comprised of storage and physical fixed price purchases. MERC is projecting the weighted average cost of gas (WACOG) for futures contracts of natural gas to be approximately \$3.3965. Please see Attachment 12, page 1 of 3. MERC is projecting the AECO Storage for PNG-GLGT to be approximately \$2.1432. This is an estimate based upon the purchases in October but since this filing is being made before the accounting is closed for October, this estimate may change.

Please see Attachment 12, page 2 of 3. The remaining 30% of the 70% is hedged by financial call options. MERC purchased call options at an average strike price of \$3.6315, which means if NYMEX contract(s) settle above that price, the options are exercised and MERC customers' gas cost is capped at the average strike price. Please see Attachment 12, page 3 of 3. Since financial options are paper only MERC purchases physical index supply to back the financial call options. MERC projects the gas costs to be approximately \$3.32 for 70% of normal winter volumes assuming that the NYMEX prices are above the average strike price plus the physical index basis spread. If the NYMEX prices are below the average strike price, the average natural gas cost for 70% of the normal winter volumes will be lower. The remaining 30% of normal winter volumes are purchased at index or market prices. All numbers reflected are natural gas costs only and do not include any transportation, storage, hedge premium or margin costs.

G. PGA Cost Recovery

MERC proposes to begin recovering the costs associated with the change in demand-related costs in its monthly PGA effective November 1, 2012. Rate impacts associated with this change can be found on Attachment 4, pages 1 and 2, and on page 1 of Attachment 7. MERC has also calculated the rate impact of moving the cost recovery of Storage contracts from the demand cost recovery portion of the monthly PGA to the commodity cost recovery portion of the monthly PGA. Attachment 4, pages 3 and 4, and Attachment 7, page 2, illustrate the rate impact created by this shift in cost recovery.

H. Impacts of Telemetry

Based on the requirement that all interruptible and transportation customers on MERC's system must have telemetry, this has led to some customers switching from

interruptible to firm. On the PNG-GLGT, there have been two (2) customers that switched from interruptible to firm service. The switching occurred between October 31, 2011 through December 7, 2011. Since MERC's peak day analysis is based on December through February volumes for the three previous winters, for the most part, these volumes aren't represented in MERC's design day analysis. MERC projected the impact on firm requirements by projecting peak day volumes for the customers that switched. The projected peak day was calculated by taking actual peak day and dividing the volume by twenty (20). MERC is projecting an increase in design day of 254 Mcf. Assuming the projected peak day is accurate, MERC may potentially have a negative reserve margin.

II. CONCLUSION

Based upon the foregoing, MERC respectfully requests the Minnesota Public Utilities Commission grant the demand changes requested herein effective November 1, 2012. If any further information, clarification, or substantiation is required to support this filing please advise.

DATED: November 1, 2012

Respectfully Submitted,

DORSEY & WHITNEY LLP

By s/
Michael J. Ahern
Suite 1500, 50 South Sixth Street
Minneapolis, MN 55402-1498
Telephone: (612) 340-2600

Attorney for Minnesota Energy
Resources Corporation

AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)
) ss
COUNTY OF HENNEPIN)

Amber S. Lee hereby certifies that on the 1st day of October, 2012, on behalf of Minnesota Energy Resources Corporation (MERC) she electronically filed a true and correct copy of the Petition on 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/ Amber S. Lee
Amber S. Lee

Subscribed and sworn to before me
this 1st day of October, 2012.

/s/ Paula Bjorkman
Notary Public, State of Minnesota

[illegible]

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|--|--|---|--------------------|-------------------|---|
| Andrew | Moratzka | apm@mcmlaw.com | Mackall, Crounse and Moore | 1400 AT&T Tower 901 Marquette Ave Minneapolis, MN 55402 | Paper Service | No | GEN_SL_Minnesota Energy Resources Corporation_General Service List |
| Eric | Swanson | eswanson@winthrop.com | Winthrop Weinstine | 225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629 | Electronic Service | No | GEN_SL_Minnesota Energy Resources Corporation_General Service List |
| Gregory | Walters | gjwalters@minnesotaenergyresources.com | Minnesota Energy Resources Corporation | 3460 Technology Dr. NW Rochester, MN 55901 | Paper Service | No | GEN_SL_Minnesota Energy Resources Corporation_General Service List |

PUBLIC DOCUMENT - TRADE SECRET DATA HAS BEEN EXCISED

Attachment 1
Page 1 of 3

MINNESOTA ENERGY RESOURCES
DESIGN-DAY DEMAND SUMMARY
NOVEMBER 1, 2012

GLGT

| | | |
|---|-----------|----------|
| Design Day Requirement | | 10003 |
| Total Entitlement on Peak Day(excl. Peak Shaving) | | 10212 |
| Firm Peak Day Actual Sendout -Non Coincidental | (Jan. 19) | 7644 |
| Firm Annual Throughput - Minnesota | | 890142.5 |
| No. of Firm Customers | | 6053 |
| DPS Load Factor Calculation | | 0.319041 |

MINNESOTA ENERGY RESOURCES - PNG
MINNESOTA DESIGN DAY REQUIREMENTS
NOVEMBER 1, 2012
GLGT

| Pipeline Group | Nov11-Mar 1/20 Customer Count | Design DDD | Regression Factors Intercept | Slope | Regressior Total Footnote 1 | Regressior Adjustmen Footnote 2 | 1/20 Requi Regressior Footnote 3 | Nov11-Mar 12 Avg. Customer Growth | Total |
|----------------|-------------------------------|------------|------------------------------|-------|-----------------------------|---------------------------------|----------------------------------|-----------------------------------|-------|
| PEAK | 6053 | 107 | 410 | 97 | 10756 | 753 | 10003 | 0 | 10003 |
| Total | 6053 | | | | | | | | 10003 |
| OFF PEAK | 6053 | 57 | 410 | 97 | 5922 | 193 | 5729 | 0 | 5729 |
| Total | 6053 | | | | | | | | 5729 |

Footnote 1 Regression Total is based on total through-put data.

Footnote 2 Regression Adjustment subtracts out Interruptible, Transportation and Joint Interruptible volumes and adds Firm Joint volumes.

Footnote 3 Total equals Regression Total minus Regression Adjustment.

*All the requirments are adjusted by customer growth

MINNESOTA ENERGY RESOURCES
DESIGN-DAY DEMAND PER CUSTOMER
NOVEMBER 1, 2012

| Heating Season | No. of Firm Customers | GLGT | |
|-------------------|-----------------------------|-------------------------------|-----------------------------|
| | | Design Day Requirements | MMBtus /Customer /Day |
| 12/13 | 6053 | 10003 | 1.652569 |
| 11/12 | 6041 | 9304 | 1.540142 |
| 10/11 | 6053 | 9440 | 1.559557 |
| 09/10 | 6068 | 10802 | 1.780158 |
| 08/09 | 5874 | 10299 | 1.75332 |
| 07/08 | 5816 | 9550 | 1.642022 |
| 06/07 | 5747 | 9543 | 1.660519 |
| 05/06 | 5679 | 9510 | 1.674591 |
| 04/05 | 5514 | 9449 | 1.713638 |

MINNESOTA ENERGY RESOURCES
SUMMER/WINTER USAGE - Mcf
PROJECTED 12 MONTHS ENDING JUNE 2013
GLGT

| Class | Summer Apr-Oct | Winter Nov-Mar | Total |
|-------|-------------------|-------------------|----------|
| GS | 246220.8 | 616095 | 862315.8 |
| SVI | 3741.2 | 15389.4 | 19130.6 |
| SVJ | 5441.8 | 22384.9 | 27826.7 |
| Total | 255403.8 | 653869.3 | 909273.1 |

Source: Calendar data from SUMG MERCFcst201204(4-26-12).xlsx

MINNESOTA ENERGY RESOURCES
ENTITLEMENT LEVELS
PROPOSED TO BE EFFECTIVE NOVEMBER 1, 2012
GLGT

| Type of Capacity or Entitlement | Current Amount Mcf or MMBtu | Proposed Change Mcf or MMBtu | Proposed Amount Mcf or MMBtu |
|---|--------------------------------------|---------------------------------------|---------------------------------------|
| FT0016 | 3899 | 24 | 3923 |
| FT0155(12) | 1386 | 8 | 1394 |
| FT0155(5) | 1400 | 9 | 1409 |
| FT15782 | 3464 | 22 | 3486 |
| Heating Season Total | 10149 | 63 | 10212 |
| Non-Heating Season Total | 8749 | 54 | 8803 |
| Total Entitlement | 10149 | 63 | 10212 |
| Heating Season Forecasted Design Day | 9304 | | 10003 |
| Non-Heating Season Forecasted Design Day | 5547 | | 5729 |
| Heating Season Capacity Surplus/Shortage | 845 | | 209 |
| Non-Heating Season Capacity Surplus/Shortage | 3202 | | 3074 |
| Reserve Margin | 0.090821 | | 0.020894 |

MINNESOTA ENERGY RESOURCES - PNG
RATE IMPACT OF THE PROPOSED DEMAND CHANGE
NOVEMBER 1, 2012

| All costs in \$/MMBtu | GLGT | | | | Current Proposal Effective Nov. 1, 2012 | Result of Proposed Change | | | |
|--------------------------|----------------------------------|--------------------------------|-------------------------------|---------|--|---------------------------|------------------|----------|-----------|
| | Last Base | Demand Change | Last | Most | | Change | Change | Change | Change |
| | Cost of | | Demand | Recent | | from | from | from | from |
| | Gas | | Change | PGA | | Last | Last | Last | Last |
| | G007, G01 MR10-978 Feb. 11 | G011- M-11-XXX Oct. 11** | G011- M-12-XXX Mar. 12^ | Oct. 12 | | Rate Case | Demand Change | PGA % | PGA \$ |

| | | | | | | | | | |
|--|----------|----------|----------|---------|----------|----------|----------|----------|----------|
| 1) General Service - Residential: Avg. Annual Use: | | | | | 84 Mcf | | | | |
| Commodity Cost | 5.5117 | 3.7221 | 3.4742 | 3.2221 | 3.288713 | -0.40332 | -0.05339 | 0.020674 | 0.066613 |
| Demand Cost | 0.7701 | 0.8421 | 0.6791 | 0.7288 | 0.781124 | 0.014315 | 0.150234 | 0.071795 | 0.052324 |
| Commodity Margin | 1.7746 | 1.7746 | 1.7746 | 1.7746 | 1.7746 | 0 | 0 | 0 | 0 |
| Total Cost of Gas | 8.0564 | 6.3388 | 5.9279 | 5.7255 | 5.844437 | -0.27456 | -0.01408 | 0.020773 | 0.118937 |
| Avg Annual Cost | 676.7376 | 532.4592 | 497.9436 | 480.942 | 490.9327 | -0.27456 | -0.01408 | 0.020773 | 9.990739 |
| Effect of proposed commodity change on average annual bills: | | | | | | | | | 5.595521 |
| Effect of proposed demand change on average annual bills: | | | | | | | | | 4.395219 |

| | | | | | | | | | |
|--|---------|----------|---------|----------|----------|----------|----------|----------|----------|
| 2) Small Vol. Interruptible: Avg. Annual Use: | | | | | 2896 Mcf | | | | |
| Commodity Cost | 5.5117 | 3.7221 | 3.4742 | 3.2221 | 3.288713 | -0.40332 | -0.05339 | 0.020674 | 0.066613 |
| Demand Cost | | | | | | | | | |
| Commodity Margin | 1.1681 | 1.1681 | 1.1681 | 1.1681 | 1.1681 | 0 | 0 | 0 | 0 |
| Total Cost of Gas | 6.6798 | 4.8902 | 4.6423 | 4.3902 | 4.456813 | -0.33279 | -0.03996 | 0.015173 | 0.066613 |
| Avg Annual Cost | 19344.7 | 14162.02 | 13444.1 | 12714.02 | 12906.93 | -0.33279 | -0.03996 | 0.015173 | 192.9122 |
| Effect of proposed commodity change on average annual bills: | | | | | | | | | 192.9122 |
| Effect of proposed demand change on average annual bills: | | | | | | | | | 0 |

| | | | | | | | | | |
|--|----------|----------|----------|----------|----------|----------|----------|----------|----------|
| 3) Small Vol. Firm: Avg. Annual Use: | | | | | 4964 Mcf | | | | |
| Avg, Annual CD units: | | | | | 50 | | | | |
| Commodity Cost | 5.5117 | 3.7221 | 3.4742 | 3.2221 | 3.288713 | -0.40332 | -0.05339 | 0.020674 | 0.066613 |
| Demand Cost | 5.2429 | 3.458 | 3.458 | 3.458 | 3.458 | -0.34044 | 0 | 0 | 0 |
| Commodity Margin | 1.1681 | 1.1681 | 1.1681 | 1.1681 | 1.1681 | 0 | 0 | 0 | 0 |
| Demand Margin | 1.8 | 1.8 | 1.8 | 1.8 | 1.8 | 0 | 0 | 0 | 0 |
| Total Cost of Gas | 6.6798 | 4.8902 | 4.6423 | 4.3902 | 4.456813 | -0.33279 | -0.03996 | 0.015173 | 0.066613 |
| Total Demand Cost | 7.0429 | 5.258 | 5.258 | 5.258 | 5.258 | -0.25343 | 0 | 0 | 0 |
| Avg Annual Cost | 33510.67 | 24537.85 | 23307.28 | 22055.85 | 22386.52 | -0.33196 | -0.03951 | 0.014992 | 330.6686 |
| Effect of proposed commodity change on average annual bills: | | | | | | | | | 330.6686 |
| Effect of proposed demand change on average annual bills: | | | | | | | | | 0 |

Note: Average Annual Average based on PNG Annual Automatic Adjustment Report in Docket No. E, G999/AA-11-793

*As submitted in Docket No. G007,011/MR-10-978; to coincide with implementation of interim rates in Docket No. G007,011/MR-10-977

**\$/Mcf rates do not include refunds/charges issued via October 2011 PGA per Docket Nos. G-007,011/M-11-154 & FERC Docket RP11-1781

^\$/Mcf Demand Cost rate reflects adjustment to Annual Demand Volumes made on March 1, 2012

MINNESOTA ENERGY RESOURCES - PNG
 CALCULATION OF PURCHASED GAS ADJUSTMENT (PGA)
 Great Lakes Current Cost of Gas

GLGT

41214 CURRENT

II. GREAT LAKES GAS TRANSMISSION'S RATES -- CURRENT COST OF GAS EFFECTIVE

Commodity From Schedule D

0.32457 /therm

III. ANNUAL SALES --

Total Annual Sales

10762470 therms

Firm Annual Sales (GS-5)

8130783 therms

IV. PNG'S -- CURRENT COST OF GAS EFFECTIVE

41214 CURRENT

| | | Monthly | | Rate \$/Dth | Contract | |
|---|----------------------|-------------|--------|-------------------|----------|----------|
| | | Entitlement | Months | | Cost | \$/therm |
| A. GS-5 | FT Wester FT0016 | 3923 | 12 | 3.458 = | 162789 | 0.020021 |
| | FT Wester FT0155 | 1394 | 12 | 3.458 = | 57845 | 0.007114 |
| | FT Wester FT0155 | 1409 | 5 | 3.458 = | 24362 | 0.002996 |
| | FT Wester FT15782 | 3486 | 12 | 3.458 = | 144655 | 0.017791 |
| | Niska Storage (AECO) | 175982.2 | 1 | 0.954824 = | 168032 | 0.020666 |
| | AECO/Emerson Swap | 175982.8 | 1 | 0.439998 = | 77432 | 0.009523 |
| | Total Demand Cost | | | | 635115 | 0.078112 |
| GS-5 Firm Annual Sales in therms | | | | | 8130783 | |
| Current Demand Cost of Gas \$/therm | | | | | | 0.078112 |
| Current T-17 Commodity Cost of Gas | | | | | | 0.32457 |
| Call Option Premium | | | | 46292.98 10762470 | | 0.004301 |
| GS-5 Total Current Commodity Cost of Gas \$/therm | | | | | | 0.328871 |
| Current Total Cost of Gas \$/therm | | | | | | 0.406984 |
| B. SVI-5 Current Commodity Cost of Gas \$/therm | | | | | | 0.328871 |
| C. SJ-5 Current Demand Cost of Gas \$/therm | | | | | | 0.3458 |
| Current Commodity Cost of Gas \$/therm | | | | | | 0.328871 |
| D. LVI-5 Current Commodity Cost of Gas \$/therm | | | | | | 0.328871 |

Rate Impacts (Illustrates FDD storage contract costs shifted from Demand costs to Commodity costs)
MINNESOTA ENERGY RESOURCES - PNG
RATE IMPACT OF THE PROPOSED DEMAND CHANGE
NOVEMBER 1, 2012

| All costs in \$/MMBtu | GLGT | | | | Current Proposal Effective Nov. 1, 2012 | Result of Proposed Change | | | |
|--|------------------------------------|--------------------------------|-------------------------------|----------|--|---------------------------|----------|----------|----------|
| | Last Base | Demand Change | Last | Most | | Change | Change | Change | Change |
| | Cost of | | Demand | Recent | | from | from | from | from |
| | Gas | | Change | PGA** | | Last | Last | Last | Last |
| | G007, G011- MR10-978 Feb. 11 | G011- M-11-XXX Oct. 11** | G011- M-12-XXX Mar. 12^ | Oct. 12 | | Rate | Demand | PGA | PGA |
| | | | | | | Case | Change | % | \$ |
| 1) General Service-Residential Avg. Annual Use: 84 Mcf | | | | | | | | | |
| Commodity Cost | 5.5117 | 3.7221 | 3.4742 | 3.2221 | 3.516787 | -0.36194 | 0.012258 | 0.091458 | 0.294687 |
| Demand Cost | 0.7701 | 0.8421 | 0.6791 | 0.7288 | 0.479229 | -0.37771 | -0.29432 | -0.34244 | -0.24957 |
| Commodity Margin | 1.7746 | 1.7746 | 1.7746 | 1.7746 | 1.7746 | 0 | 0 | 0 | 0 |
| Total Cost of Gas | 8.0564 | 6.3388 | 5.9279 | 5.7255 | 5.770617 | -0.28372 | -0.02653 | 0.00788 | 0.045117 |
| Avg Annual Cost | 676.7376 | 532.4592 | 497.9436 | 480.942 | 484.7318 | -0.28372 | -0.02653 | 0.00788 | 3.789807 |
| Effect of proposed commodity change on average annual bills: | | | | | | | | | 24.75374 |
| Effect of proposed demand change on average annual bills: | | | | | | | | | -20.9639 |
| 2) Small Vol. Interruptible: Avg. Annual Use: 2896 Mcf | | | | | | | | | |
| Commodity Cost | 5.5117 | 3.7221 | 3.4742 | 3.2221 | 3.516787 | -0.36194 | 0.012258 | 0.091458 | 0.294687 |
| Demand Cost | | | | | | | | | |
| Commodity Margin | 1.1681 | 1.1681 | 1.1681 | 1.1681 | 1.1681 | 0 | 0 | 0 | 0 |
| Total Cost of Gas | 6.6798 | 4.8902 | 4.6423 | 4.3902 | 4.684887 | -0.29865 | 0.009174 | 0.067124 | 0.294687 |
| Avg Annual Cost | 19344.7 | 14162.02 | 13444.1 | 12714.02 | 13567.43 | -0.29865 | 0.009174 | 0.067124 | 853.4147 |
| Effect of proposed commodity change on average annual bills: | | | | | | | | | 853.4147 |
| Effect of proposed demand change on average annual bills: | | | | | | | | | 0 |
| 3) Small Vol. Firm: Avg. Annual Use: 4964 Mcf | | | | | | | | | |
| | Avg, Annual CD units: 50 | | | | | | | | |
| Commodity Cost | 5.5117 | 3.7221 | 3.4742 | 3.2221 | 3.516787 | -0.36194 | 0.012258 | 0.091458 | 0.294687 |
| Demand Cost | 5.2429 | 3.458 | 3.458 | 3.458 | 3.458 | -0.34044 | 0 | 0 | 0 |
| Commodity Margin | 1.1681 | 1.1681 | 1.1681 | 1.1681 | 1.1681 | 0 | 0 | 0 | 0 |
| Demand Margin | 1.8 | 1.8 | 1.8 | 1.8 | 1.8 | 0 | 0 | 0 | 0 |
| Total Cost of Gas | 6.6798 | 4.8902 | 4.6423 | 4.3902 | 4.684887 | -0.29865 | 0.009174 | 0.067124 | 0.294687 |
| Total Demand Cost | 7.0429 | 5.258 | 5.258 | 5.258 | 5.258 | -0.25343 | 0 | 0 | 0 |
| Avg Annual Cost | 33510.67 | 24537.85 | 23307.28 | 22055.85 | 23518.68 | -0.29817 | 0.00907 | 0.066324 | 1462.828 |
| Effect of proposed commodity change on average annual bills: | | | | | | | | | 1462.828 |
| Effect of proposed demand change on average annual bills: | | | | | | | | | 0 |

Note: Average Annual Average based on PNG Annual Automatic Adjustment Report in Docket No. E, G999/AA-11-793

*As submitted in Docket No. G007,011/MR-10-978; to coincide with implementation of interim rates in Docket No. G007,011/MR-10-977

**\$/Mcf rates do not include refunds/charges issued via October 2011 PGA per Docket Nos. G-007,011/M-11-154 & FERC Docket RP11-1781

^\$/Mcf Demand Cost rate reflects adjustment to Annual Demand Volumes made on March 1, 2012

Rate Impacts (Illustrates FDD storage contract costs shifted from Demand costs to Commodity) Page 4 of 4

MINNESOTA ENERGY RESOURCES - PNG

CALCULATION OF PURCHASED GAS ADJUSTMENT (PGA)

GLGT

Great Lakes Current Cost of Gas

41214 CURRENT

II. GREAT LAKES GAS TRANSMISSION'S RATES -- CURRENT COST OF GAS EFFECTIVE

Commodity From Schedule D

0.32457 /therm

III. ANNUAL SALES --

Total Annual Sales

10762470 therms

Firm Annual Sales (GS-5)

8130783 therms

IV. PNG'S -- CURRENT COST OF GAS EFFECTIVE

41214 CURRENT

| | | Monthly | | Contract | | | |
|---|--------------------|-------------|----------|-------------|----------|----------|----------|
| | | Entitlement | Months | Rate \$/Dth | Cost | \$/therm | |
| A. GS-5 | FT Western FT0016 | 3923 | 12 | 3.458 = | 162789 | 0.020021 | |
| | FT Western FT0155 | 1394 | 12 | 3.458 = | 57845 | 0.007114 | |
| | FT Western FT0155 | 1409 | 5 | 3.458 = | 24362 | 0.002996 | |
| | FT Western FT15782 | 3486 | 12 | 3.458 = | 144655 | 0.017791 | |
| | | | | = | 0 | 0 | |
| Total Demand Cost | | | | | 389651 | 0.047923 | |
| Niska Storage (AECO) 175982.2 | | 0 | 0 | 0 = | 0 | 0 | |
| AECO/Emerson Swap 175982.8 | | 0 | 0 | 0 = | 0 | 0 | |
| | | | | | 0 | 0 | |
| GS-5 Firm Annual Sales in therms | | | | | 8130783 | | 0.047923 |
| Current Demand Cost of Gas \$/therm | | | | | | 0.047923 | |
| Current T-17 Commodity Cost of Gas | | | | | | 0.32457 | |
| Call Option Premium | | | | | 10762470 | 46292.98 | 0.004301 |
| Niska Storage (AECO) 175982.2 | | 1 | 0.954824 | 10762470 | 168032 | 0.015613 | |
| AECO/Emerson Swap 175982.8 | | 1 | 0.439998 | 10762470 | 77432 | 0.007195 | |
| GS-5 Total Current Commodity Cost of Gas \$/therm | | | | | | 0.351679 | 0.351679 |
| Current Total Cost of Gas \$/therm | | | | | | 0.399602 | |
| B. SVI-5 Current Commodity Cost of Gas \$/therm | | | | | | 0.351679 | |
| C. SJ-5 Current Demand Cost of Gas \$/therm | | | | | | 0.3458 | |
| Current Commodity Cost of Gas \$/therm | | | | | | 0.351679 | |
| D. LVI-5 Current Commodity Cost of Gas \$/therm | | | | | | 0.351679 | |

MINNESOTA ENERGY RESOURCES - PNG-GLGT
Financial Options
Heating Season 2012-2013

[TRADE SECRET DATA BEGINS

Units - Gas Daily Peaker Packages (Physical)

| November Contract Date | Daily Volume | December Contract Date | Daily Volume | January Contract Date | Daily Volume | February Contract Date | Daily Volume | March Contract Date | Daily Volume | Daily Total | Term Total |
|------------------------------|-----------------|------------------------------|-----------------|-----------------------------|-----------------|------------------------------|-----------------|---------------------------|-----------------|----------------|---------------|
| | | | | | | | | | | 0 | 0 |

Premium - Gas Daily Peaker (Monthly Cost)

| November Option Premium | Premium Cost | December Option Premium | Premium Cost | January Option Premium | Premium Cost | February Option Premium | Premium Cost | March Option Premium | Premium Cost | Total Option Premium | Premium Cost |
|-------------------------------|-----------------|-------------------------------|-----------------|------------------------------|-----------------|-------------------------------|-----------------|----------------------------|-----------------|----------------------------|-----------------|
| | | | | | | | | | | 0 | 0 |

Units - Futures (Daily Volume)

| November Contract Date | Daily Volume | December Contract Date | Daily Volume | January Contract Date | Daily Volume | February Contract Date | Daily Volume | March Contract Date | Daily Volume | Daily Total | Term Total |
|------------------------------|-----------------|------------------------------|-----------------|-----------------------------|-----------------|------------------------------|-----------------|---------------------------|-----------------|----------------|---------------|
| 1 | | | | | | | | | | | |
| 2 | | | | | | | | | | | |
| 3 | | | | | | | | | | | |
| 4 | | | | | | | | | | | |
| 5 | | | | | | | | | | | |
| 6 | | | | | | | | | | | |
| 7 | | | | | | | | | | | |
| 8 | | | | | | | | | | | |
| 9 | | | | | | | | | | | |
| 10 | | | | | | | | | | | |

| | | | | | | | |
|-------|-------------------|------------------|-------------------|-------------------|-------------------|----------|--------|
| Total | 999.9999 30000 | 967.742 30000 | 1290.323 40000 | 1071.429 30000 | 967.7419 30000 | 5297.235 | 160000 |
|-------|-------------------|------------------|-------------------|-------------------|-------------------|----------|--------|

Units - Call Options (Daily Volume)

| November Contract Date | Daily Volume | December Contract Date | Daily Volume | January Contract Date | Daily Volume | February Contract Date | Daily Volume | March Contract Date | Daily Volume | Daily Total | Term Total |
|------------------------------|-----------------|------------------------------|-----------------|-----------------------------|-----------------|------------------------------|-----------------|---------------------------|-----------------|----------------|---------------|
| 1 | | | | | | | | | | | |
| 2 | | | | | | | | | | | |
| 3 | | | | | | | | | | | |
| 4 | | | | | | | | | | | |
| 5 | | | | | | | | | | | |
| 6 | | | | | | | | | | | |
| 7 | | | | | | | | | | | |

| | | | | | | | |
|-------|---------------|-------------------|-------------------|-------------------|------------------|---------|--------|
| Total | 1000 30000 | 1612.903 50000 | 1612.903 50000 | 1428.571 40000 | 967.742 30000 | 6622.12 | 200000 |
|-------|---------------|-------------------|-------------------|-------------------|------------------|---------|--------|

Premium - Call Option (Monthly Cost)

| November Option Premium | Premium Cost | December Option Premium | Premium Cost | January Option Premium | Premium Cost | February Option Premium | Premium Cost | March Option Premium | Premium Cost | Total Option Premium | Premium Cost |
|-------------------------------|-----------------|-------------------------------|-----------------|------------------------------|-----------------|-------------------------------|-----------------|----------------------------|-----------------|----------------------------|-----------------|
| 1 | | | | | | | | | | | |
| 2 | | | | | | | | | | | |
| 3 | | | | | | | | | | | |
| 4 | | | | | | | | | | | |
| 5 | | | | | | | | | | | |
| 6 | | | | | | | | | | | |
| 7 | | | | | | | | | | | |

| | | | | | | | | | | | | |
|-------|--------|----------|-------|------|--------|----------|--------|----------|--------|----------|--------|----------|
| Total | 0.1659 | 4975.826 | 0.191 | 9550 | 0.2373 | 11866.67 | 0.2807 | 11229.16 | 0.2827 | 8481.207 | 0.2305 | 46102.86 |
|-------|--------|----------|-------|------|--------|----------|--------|----------|--------|----------|--------|----------|

Units - Collar Floor (put)
No Puts were purchased.

TRADE SECRET DATA ENDS]

MINNESOTA ENERGY RESOURCES - PNG

| 2009-10 | | 2010-11 | |
|--------------------------|------|--------------------------|------|
| G011/M-09 Quantity (Mcf) | | G011/M-10 Quantity (Mcf) | |
| FT0017 | 4105 | FT0017 | 4105 |
| FT0075 | 1973 | FT0075 | 1973 |
| FT0155 | 2422 | FT0155 | 2422 |
| FT0155 | 1500 | FT0155 | 1500 |
| FT0011 | 0 | FT0011 | 0 |
| FT8466 | 500 | FT8466 | 1500 |
| Total Design | | Total Design | |
| 10500 | | 11500 | |
| Total GL T | | Total GL T | |
| 10500 | | 11500 | |
| Total Trans | | Total Trans | |
| 10500 | | 11500 | |
| Total Seasonal | | Total Seasonal | |
| 1500 | | 1500 | |
| Percent Seasonal | | Percent Seasonal | |
| 0.142857 | | 0.130435 | |
| 2011-12 | | 2012-13 | |
| G011/M-11 Quantity (Mcf) | | G011/M-12 Quantity (Mcf) | |
| FT0016 | 3899 | FT0016 | 3923 |
| FT0075 | 0 | FT0075 | 0 |
| FT0155 | 1386 | FT0155 | 1394 |
| FT0155 | 1400 | FT0155 | 1409 |
| FT0011 | 0 | FT0011 | 0 |
| FT8466 | 0 | FT8466 | 0 |
| FT15782 | 3464 | FT15782 | 3486 |
| Total Design | | Total Design | |
| 10149 | | 10212 | |
| Total GL T | | Total GL T | |
| 10149 | | 10212 | |
| Total Trans | | Total Trans | |
| 10149 | | 10212 | |
| Total Seasonal | | Total Seasonal | |
| 1400 | | 1409 | |
| Percent Seasonal | | Percent Seasonal | |
| 0.137945 | | 0.137975 | |
| | | 3.03E-05 | |

MINNESOTA ENERGY RESOURCES - PNG

| | Base Cost Change | Last Dema Change | Most Rece PGA | Nov 1/12 P w/ Propose | % Change From Last | % Change From Last | % Change From Last | \$ Change From Last |
|------------|---------------------|---------------------|------------------|--------------------------|-----------------------|-----------------------|-----------------------|------------------------|
| General Se | G011/MR1 | Mar. 12^ | Oct. 12 | Demand C | Rate Case | Demand Fi | PGA | PGA |
| Commodity | 5.5117 | 3.4742 | 3.2221 | 3.288713 | -0.40332 | -0.05339 | 0.020674 | 0.066613 |
| Demand C | 0.7701 | 0.6791 | 0.7288 | 0.781124 | 0.014315 | 0.150234 | 0.071795 | 0.052324 |
| Commodity | 1.7746 | 1.7746 | 1.7746 | 1.7746 | 0 | 0 | 0 | 0 |
| Total Reco | 8.0564 | 5.9279 | 5.7255 | 5.844437 | -0.27456 | -0.01408 | 0.020773 | 0.118937 |
| Average Ai | 84 | 84 | 84 | 84 | | | | |
| Average Ai | 676.7376 | 497.9436 | 480.942 | 490.9327 | -0.27456 | -0.01408 | 0.020773 | 9.990739 |

| | Base Cost Change | Last Dema Change | Most Rece PGA | Nov 1/12 P w/ Propose | % Change From Last | % Change From Last | % Change From Last | \$ Change From Last |
|--------------------|---------------------|---------------------|------------------|--------------------------|-----------------------|-----------------------|-----------------------|------------------------|
| Small Volu | G011/MR1 | Mar. 12^ | Oct. 12 | Demand C | Rate Case | Demand Fi | PGA | PGA |
| Commodity | 5.5117 | 3.4742 | 3.2221 | 3.288713 | -0.40332 | -0.05339 | 0.020674 | 0.066613 |
| Demand Cost of Gas | | | | | 0 | 0 | 0 | 0 |
| Commodity | 1.1681 | 1.1681 | 1.1681 | 1.1681 | 0 | 0 | 0 | 0 |
| Total Reco | 6.6798 | 4.6423 | 4.3902 | 4.456813 | -0.33279 | -0.03996 | 0.015173 | 0.066613 |
| Average Ai | 2896 | 2896 | 2896 | 2896 | | | | |
| Average Ai | 19344.7 | 13444.1 | 12714.02 | 12906.93 | -0.33279 | -0.03996 | 0.015173 | 192.9122 |

| | Base Cost Change | Last Dema Change | Most Rece PGA | Nov 1/12 P w/ Propose | % Change From Last | % Change From Last | % Change From Last | \$ Change From Last |
|------------|---------------------|---------------------|------------------|--------------------------|-----------------------|-----------------------|-----------------------|------------------------|
| Small Volu | G011/MR1 | Mar. 12^ | Oct. 12 | Demand C | Rate Case | Demand Fi | PGA | PGA |
| Commodity | 5.5117 | 3.4742 | 3.2221 | 3.288713 | -0.40332 | -0.05339 | 0.020674 | 0.066613 |
| Demand C | 5.2429 | 3.458 | 3.458 | 3.458 | -0.34044 | 0 | 0 | 0 |
| Commodity | 1.1681 | 1.1681 | 1.1681 | 1.1681 | 0 | 0 | 0 | 0 |
| Demand M | 1.8 | 1.8 | 1.8 | 1.8 | 0 | 0 | 0 | 0 |
| Total Comi | 6.6798 | 4.6423 | 4.3902 | 4.456813 | -0.33279 | -0.03996 | 0.015173 | 0.066613 |
| Total Dem: | 7.0429 | 5.258 | 5.258 | 5.258 | -0.25343 | 0 | 0 | 0 |
| Total Reco | 27.4454 | 19.8006 | 19.2964 | 19.42963 | -0.29206 | -0.01874 | 0.006904 | 0.133227 |
| Average Ai | 4964 | 4964 | 4964 | 4964 | | | | |
| Average Ai | 50 | 50 | 50 | 50 | | | | |
| Average Ai | 33510.67 | 23307.28 | 22055.85 | 22386.52 | -0.33196 | -0.03951 | 0.014992 | 330.6686 |

| | Commodity Change | Commodity Change | Demand Change | Demand Change | Total Change | Total Change |
|------------|---------------------|---------------------|------------------|------------------|-----------------|-----------------|
| Summary | (\$/Mcf) | (%) | (\$/Mcf) | (%) | (\$/Mcf) | (%) |
| General Se | 0.066613 | 0.020674 | 0.052324 | 0.071795 | 0.118937 | 0.020773 |
| Small Volu | 0.066613 | 0.020674 | 0 | 0 | 0.066613 | 0.015173 |
| Small/Larg | 0.066613 | 0 | 0 | 0 | 0.133227 | 0.006904 |

* Average Annual Bill amount does not include customer charges.

^\$/Mcf Demand Cost rate reflects adjustment to Annual Demand Volumes made on March 1, 2012

Rate Impacts (Illustrates FDD storage contract costs shifted from Demand costs to Commodity) Page 1 of 2
MINNESOTA ENERGY RESOURCES - PNG

| | Base Cost Change | Last Dema Change | Most Rece PGA | Nov 1/12 P w/ Proposed Demand C | % Change From Last Rate Case | % Change From Last Demand Fi | % Change From Last PGA | \$ Change From Last PGA |
|------------|---------------------|---------------------|------------------|---------------------------------------|------------------------------------|------------------------------------|------------------------------|-------------------------------|
| General Se | G011/MR1 | Mar. 12^ | Oct. 12 | | | | | |
| Commodity | 5.5117 | 3.4742 | 3.2221 | 3.516787 | -0.36194 | 0.012258 | 0.091458 | 0.294687 |
| Demand C | 0.7701 | 0.6791 | 0.7288 | 0.479229 | -0.37771 | -0.29432 | -0.34244 | -0.24957 |
| Commodity | 1.7746 | 1.7746 | 1.7746 | 1.7746 | 0 | 0 | 0 | 0 |
| Total Reco | 8.0564 | 5.9279 | 5.7255 | 5.770617 | -0.28372 | -0.02653 | 0.00788 | 0.045117 |
| Average Ai | 84 | 84 | 84 | 84 | | | | |
| Average Ai | 676.7376 | 497.9436 | 480.942 | 484.7318 | -0.28372 | -0.02653 | 0.00788 | 3.789807 |

| | Base Cost Change | Last Dema Change | Most Rece PGA | Nov 1/12 P w/ Proposed Demand C | % Change From Last Rate Case | % Change From Last Demand Fi | % Change From Last PGA | \$ Change From Last PGA |
|--------------------|---------------------|---------------------|------------------|---------------------------------------|------------------------------------|------------------------------------|------------------------------|-------------------------------|
| Small Volu | G011/MR1 | Mar. 12^ | Oct. 12 | | | | | |
| Commodity | 5.5117 | 3.4742 | 3.2221 | 3.516787 | -0.36194 | 0.012258 | 0.091458 | 0.294687 |
| Demand Cost of Gas | | | | | 0 | 0 | 0 | 0 |
| Commodity | 1.1681 | 1.1681 | 1.1681 | 1.1681 | 0 | 0 | 0 | 0 |
| Total Reco | 6.6798 | 4.6423 | 4.3902 | 4.684887 | -0.29865 | 0.009174 | 0.067124 | 0.294687 |
| Average Ai | 2896 | 2896 | 2896 | 2896 | | | | |
| Average Ai | 19344.7 | 13444.1 | 12714.02 | 13567.43 | -0.29865 | 0.009174 | 0.067124 | 853.4147 |

| | Base Cost Change | Last Dema Change | Most Rece PGA | Nov 1/12 P w/ Proposed Demand C | % Change From Last Rate Case | % Change From Last Demand Fi | % Change From Last PGA | \$ Change From Last PGA |
|------------|---------------------|---------------------|------------------|---------------------------------------|------------------------------------|------------------------------------|------------------------------|-------------------------------|
| Small Volu | G011/MR1 | Mar. 12^ | Oct. 12 | | | | | |
| Commodity | 5.5117 | 3.4742 | 3.2221 | 3.516787 | -0.36194 | 0.012258 | 0.091458 | 0.294687 |
| Demand C | 5.2429 | 3.458 | 3.458 | 3.458 | -0.34044 | 0 | 0 | 0 |
| Commodity | 1.1681 | 1.1681 | 1.1681 | 1.1681 | 0 | 0 | 0 | 0 |
| Demand M | 1.8 | 1.8 | 1.8 | 1.8 | 0 | 0 | 0 | 0 |
| Total Comi | 6.6798 | 4.6423 | 4.3902 | 4.684887 | -0.29865 | 0.009174 | 0.067124 | 0.294687 |
| Total Dem: | 7.0429 | 5.258 | 5.258 | 5.258 | -0.25343 | 0 | 0 | 0 |
| Total Reco | 27.4454 | 19.8006 | 19.2964 | 19.88577 | -0.27544 | 0.004302 | 0.030543 | 0.589375 |
| Average Ai | 4964 | 4964 | 4964 | 4964 | | | | |
| Average Ai | 50 | 50 | 50 | 50 | | | | |
| Average Ai | 33510.67 | 23307.28 | 22055.85 | 23518.68 | -0.29817 | 0.00907 | 0.066324 | 1462.828 |

| | Commodity Change | Commodity Change | Demand Change | Demand Change | Total Change | Total Change |
|------------|---------------------|---------------------|------------------|------------------|-----------------|-----------------|
| Summary | (\$/Mcf) | (%) | (\$/Mcf) | (%) | (\$/Mcf) | (%) |
| General Se | 0.294687 | 0.091458 | -0.24957 | -0.34244 | 0.045117 | 0.00788 |
| Small Volu | 0.294687 | 0.091458 | 0 | 0 | 0.294687 | 0.067124 |
| Small/Larg | 0.294687 | 0 | 0 | 0 | 0.589375 | 0.030543 |

* Average Annual Bill amount does not include customer charges.

^\$/Mcf Demand Cost rate reflects adjustment to Annual Demand Volumes made on March 1, 2012

MINNESOTA ENERGY RESOURCES - PNG

GLGT

Peoples Great Lakes -- Current Cost of Gas Effective

| | Oct. 2012 Entitlement | Nov. 2012 Entitlement | Entitlement Change | Months | Oct. 2012 Rate | Oct. 2012 Total Annu | Nov. 2012 Total Annu | Total Annual Cost Change |
|------------|--------------------------|--------------------------|-----------------------|--------|-------------------|-------------------------|-------------------------|-----------------------------|
| T-17 Dema | 3899 | 3923 | 24 | 12 | 3.458 | 161792.9 | 162788.8 | 995.904 |
| FT-075- R | 0 | 0 | 0 | 12 | 3.458 | 0 | 0 | 0 |
| FT-155 (12 | 1386 | 1394 | 8 | 12 | 3.458 | 57513.46 | 57845.42 | 331.968 |
| FT-155 (5) | 1400 | 1409 | 9 | 5 | 3.458 | 24206 | 24361.61 | 155.61 |
| FT-8466 | 0 | 0 | 0 | 12 | 3.458 | 0 | 0 | 0 |
| FT-15782 | 3464 | 3486 | 22 | 12 | 3.458 | 143742.1 | 144655.1 | 912.912 |
| Niska Stor | 147196 | 175982.2 | 28786.25 | 1 | 0.954824 | 140547.2 | 168032 | 27484.79 |
| AECO/Em | 147197 | 175982.8 | 28785.8 | 1 | 0.439998 | 64767.32 | 77432 | 12664.68 |
| | | | | | | 592569 | 635114.9 | 42545.86 |

PUBLIC DOCUMENT - TRADE SECRET DATA HAS BEEN EXCISED

Attachment 9
Page 1 of 3

MINNESOTA ENERGY RESOURCES - PNG
12/13 Winter Portfolio Plan - MERC GLGT-PNG Hedging Plan
[TRADE SECRET DATA BEGINS

PUBLIC DOCUMENT - TRADE SECRET DATA HAS BEEN EXCISED

[TRADE SECRET DATA ENDS

PUBLIC DOCUMENT - TRADE SECRET DATA HAS BEEN EXCISED

Attachment 9
Page 2 of 3

MINNESOTA ENERGY RESOURCES
GLGT WINTER PLAN (PNG)
NOVEMBER, 2012 THROUGH MARCH, 2013
[TRADE SECRET DATA BEGINS

| PHYSICAL FIXED PR | Trigger | Trigger | | Daily Volumes | | | | | Monthly |
|-------------------|---------|-----------|---------------|---------------|-----|-----|-----|-----|---------|
| Deal # | Locked | Exercised | Receipt Point | Nov | Dec | Jan | Feb | Mar | Total |

175982.2

TRADE SECRET DATA ENDS]

PUBLIC DOCUMENT - TRADE SECRET DATA HAS BEEN EXCISED

Attachment 10
GLGT

MINNESOTA ENERGY RESOURCES - PNG

Daily Total Throughput Data - July 1, 2011 through June 30, 2012

| | | | | |
|-------|----------|----------|----------|-----------|
| | | | Base | 410 |
| | | | Variable | 97 |
| | 1 | 1 | Actual | |
| | Bemidji | Weighted | Total | Estimated |
| | Adjusted | Adjusted | Through- | Through- |
| Date | HDD | HDD | Put * | Put |
| 40725 | 0 | 0 | 594 | 410 |
| 40726 | 4.28 | 4.28 | 565 | 825.16 |
| 40727 | 0 | 0 | 542 | 410 |
| 40728 | 0 | 0 | 544 | 410 |
| 40729 | 1.07 | 1.07 | 616 | 513.79 |
| 40730 | 0 | 0 | 589 | 410 |
| 40731 | 0 | 0 | 601 | 410 |
| 40732 | 0 | 0 | 558 | 410 |
| 40733 | 0 | 0 | 524 | 410 |
| 40734 | 0 | 0 | 546 | 410 |
| 40735 | 3.27 | 3.27 | 652 | 727.19 |
| 40736 | 8.4 | 8.4 | 655 | 1224.8 |
| 40737 | 1.09 | 1.09 | 652 | 515.73 |
| 40738 | 3.33 | 3.33 | 657 | 733.01 |
| 40739 | 0 | 0 | 565 | 410 |
| 40740 | 0 | 0 | 512 | 410 |
| 40741 | 0 | 0 | 514 | 410 |
| 40742 | 0 | 0 | 537 | 410 |
| 40743 | 0 | 0 | 591 | 410 |
| 40744 | 0 | 0 | 571 | 410 |
| 40745 | 0 | 0 | 610 | 410 |
| 40746 | 0 | 0 | 611 | 410 |
| 40747 | 3.21 | 3.21 | 582 | 721.37 |
| 40748 | 0 | 0 | 573 | 410 |
| 40749 | 1.07 | 1.07 | 625 | 513.79 |
| 40750 | 0 | 0 | 617 | 410 |
| 40751 | 0 | 0 | 620 | 410 |
| 40752 | 0 | 0 | 624 | 410 |
| 40753 | 0 | 0 | 583 | 410 |
| 40754 | 0 | 0 | 546 | 410 |
| 40755 | 0 | 0 | 552 | 410 |
| 40756 | 0 | 0 | 585 | 410 |
| 40757 | 0 | 0 | 632 | 410 |
| 40758 | 0 | 0 | 595 | 410 |
| 40759 | 0 | 0 | 585 | 410 |
| 40760 | 0 | 0 | 565 | 410 |
| 40761 | 0 | 0 | 565 | 410 |
| 40762 | 0 | 0 | 578 | 410 |
| 40763 | 0 | 0 | 648 | 410 |

| | | | | |
|-------|-------|-------|------|---------|
| 40764 | 7.7 | 7.7 | 686 | 1156.9 |
| 40765 | 0 | 0 | 644 | 410 |
| 40766 | 0 | 0 | 613 | 410 |
| 40767 | 2.06 | 2.06 | 610 | 609.82 |
| 40768 | 1.02 | 1.02 | 569 | 508.94 |
| 40769 | 0 | 0 | 564 | 410 |
| 40770 | 0 | 0 | 609 | 410 |
| 40771 | 0 | 0 | 590 | 410 |
| 40772 | 0 | 0 | 565 | 410 |
| 40773 | 0 | 0 | 613 | 410 |
| 40774 | 6.48 | 6.48 | 665 | 1038.56 |
| 40775 | 7.35 | 7.35 | 612 | 1122.95 |
| 40776 | 4.16 | 4.16 | 567 | 813.52 |
| 40777 | 0 | 0 | 650 | 410 |
| 40778 | 0 | 0 | 587 | 410 |
| 40779 | 2.24 | 2.24 | 564 | 627.28 |
| 40780 | 0 | 0 | 646 | 410 |
| 40781 | 4.36 | 4.36 | 657 | 832.92 |
| 40782 | 6.12 | 6.12 | 612 | 1003.64 |
| 40783 | 1.04 | 1.04 | 629 | 510.88 |
| 40784 | 0 | 0 | 658 | 410 |
| 40785 | 0 | 0 | 684 | 410 |
| 40786 | 0 | 0 | 683 | 410 |
| 40787 | 0 | 0 | 694 | 410 |
| 40788 | 5.2 | 5.2 | 679 | 914.4 |
| 40789 | 12.54 | 12.54 | 706 | 1626.38 |
| 40790 | 16.8 | 16.8 | 751 | 2039.6 |
| 40791 | 11.55 | 11.55 | 768 | 1530.35 |
| 40792 | 6.42 | 6.42 | 729 | 1032.74 |
| 40793 | 4.08 | 4.08 | 683 | 805.76 |
| 40794 | 0 | 0 | 697 | 410 |
| 40795 | 0 | 0 | 660 | 410 |
| 40796 | 0 | 0 | 641 | 410 |
| 40797 | 0 | 0 | 642 | 410 |
| 40798 | 10.17 | 10.17 | 789 | 1396.49 |
| 40799 | 19.04 | 19.04 | 1081 | 2256.88 |
| 40800 | 28.34 | 28.34 | 1683 | 3158.98 |
| 40801 | 23.69 | 23.69 | 1482 | 2707.93 |
| 40802 | 19.8 | 19.8 | 1280 | 2330.6 |
| 40803 | 18.24 | 18.24 | 1104 | 2179.28 |
| 40804 | 18.02 | 18.02 | 1097 | 2157.94 |
| 40805 | 8.64 | 8.64 | 876 | 1248.08 |
| 40806 | 15.26 | 15.26 | 1148 | 1890.22 |
| 40807 | 28.6 | 28.6 | 1627 | 3184.2 |
| 40808 | 24.72 | 24.72 | 1526 | 2807.84 |
| 40809 | 18.9 | 18.9 | 1196 | 2243.3 |
| 40810 | 18.72 | 18.72 | 1075 | 2225.84 |
| 40811 | 19.08 | 19.08 | 1064 | 2260.76 |
| 40812 | 14.28 | 14.28 | 1001 | 1795.16 |
| 40813 | 9.09 | 9.09 | 909 | 1291.73 |
| 40814 | 2.2 | 2.2 | 772 | 623.4 |
| 40815 | 18.08 | 18.08 | 1223 | 2163.76 |

| | | | | |
|-------|-------|-------|------|---------|
| 40816 | 21.4 | 21.4 | 1347 | 2485.8 |
| 40817 | 14.56 | 14.56 | 1085 | 1822.32 |
| 40818 | 4.2 | 4.2 | 830 | 817.4 |
| 40819 | 0 | 0 | 781 | 410 |
| 40820 | 0 | 0 | 761 | 410 |
| 40821 | 0 | 0 | 754 | 410 |
| 40822 | 0 | 0 | 737 | 410 |
| 40823 | 0 | 0 | 715 | 410 |
| 40824 | 11.66 | 11.66 | 784 | 1541.02 |
| 40825 | 13.08 | 13.08 | 957 | 1678.76 |
| 40826 | 11 | 11 | 974 | 1477 |
| 40827 | 7.49 | 7.49 | 834 | 1136.53 |
| 40828 | 14.04 | 14.04 | 1006 | 1771.88 |
| 40829 | 23.73 | 23.73 | 1540 | 2711.81 |
| 40830 | 29 | 29 | 1778 | 3223 |
| 40831 | 25.3 | 25.3 | 1669 | 2864.1 |
| 40832 | 30 | 30 | 2079 | 3320 |
| 40833 | 27.84 | 27.84 | 2305 | 3110.48 |
| 40834 | 33.17 | 33.17 | 2913 | 3627.49 |
| 40835 | 36.4 | 36.4 | 2885 | 3940.8 |
| 40836 | 29.87 | 29.87 | 2670 | 3307.39 |
| 40837 | 26.5 | 26.5 | 2148 | 2980.5 |
| 40838 | 22.26 | 22.26 | 1728 | 2569.22 |
| 40839 | 28.62 | 28.62 | 2262 | 3186.14 |
| 40840 | 27.81 | 27.81 | 2284 | 3107.57 |
| 40841 | 27.54 | 27.54 | 2591 | 3081.38 |
| 40842 | 27.81 | 27.81 | 2510 | 3107.57 |
| 40843 | 29.58 | 29.58 | 2750 | 3279.26 |
| 40844 | 35.31 | 35.31 | 2780 | 3835.07 |
| 40845 | 32.1 | 32.1 | 2331 | 3523.7 |
| 40846 | 29.4 | 29.4 | 2398 | 3261.8 |
| 40847 | 28.34 | 28.34 | 2293 | 3158.98 |
| 40848 | 30.24 | 30.24 | 2631 | 3343.28 |
| 40849 | 34.98 | 34.98 | 3093 | 3803.06 |
| 40850 | 28.34 | 28.34 | 2725 | 3158.98 |
| 40851 | 24.36 | 24.36 | 2422 | 2772.92 |
| 40852 | 23 | 23 | 1952 | 2641 |
| 40853 | 30.42 | 30.42 | 3088 | 3360.74 |
| 40854 | 40.28 | 40.28 | 3759 | 4317.16 |
| 40855 | 34.32 | 34.32 | 3166 | 3739.04 |
| 40856 | 39.1 | 39.1 | 3627 | 4202.7 |
| 40857 | 39.96 | 39.96 | 3764 | 4286.12 |
| 40858 | 31.5 | 31.5 | 2976 | 3465.5 |
| 40859 | 27.56 | 27.56 | 2489 | 3083.32 |
| 40860 | 36.72 | 36.72 | 3450 | 3971.84 |
| 40861 | 36.38 | 36.38 | 3348 | 3938.86 |
| 40862 | 42.9 | 42.9 | 4169 | 4571.3 |
| 40863 | 56.5 | 56.5 | 5235 | 5890.5 |
| 40864 | 52.43 | 52.43 | 4756 | 5495.71 |
| 40865 | 44.94 | 44.94 | 4567 | 4769.18 |
| 40866 | 56.16 | 56.16 | 5449 | 5857.52 |
| 40867 | 53.04 | 53.04 | 5360 | 5554.88 |

| | | | | |
|-------|-------|-------|------|---------|
| 40868 | 49.22 | 49.22 | 4373 | 5184.34 |
| 40869 | 36.38 | 36.38 | 3738 | 3938.86 |
| 40870 | 27.82 | 27.82 | 2835 | 3108.54 |
| 40871 | 27.04 | 27.04 | 2853 | 3032.88 |
| 40872 | 31.03 | 31.03 | 2981 | 3419.91 |
| 40873 | 39.9 | 39.9 | 3866 | 4280.3 |
| 40874 | 43.87 | 43.87 | 4330 | 4665.39 |
| 40875 | 41.04 | 41.04 | 4141 | 4390.88 |
| 40876 | 43.86 | 43.86 | 4060 | 4664.42 |
| 40877 | 46.01 | 46.01 | 4395 | 4872.97 |
| 40878 | 52.92 | 52.92 | 5485 | 5543.24 |
| 40879 | 41.44 | 41.44 | 4520 | 4429.68 |
| 40880 | 47.52 | 47.52 | 4825 | 5019.44 |
| 40881 | 57.24 | 57.24 | 5617 | 5962.28 |
| 40882 | 65.92 | 65.92 | 7026 | 6804.24 |
| 40883 | 56.61 | 56.61 | 5411 | 5901.17 |
| 40884 | 50.4 | 50.4 | 5293 | 5298.8 |
| 40885 | 66.6 | 66.6 | 6896 | 6870.2 |
| 40886 | 62.06 | 62.06 | 6584 | 6429.82 |
| 40887 | 45.15 | 45.15 | 4421 | 4789.55 |
| 40888 | 36.72 | 36.72 | 4066 | 3971.84 |
| 40889 | 45.32 | 45.32 | 4753 | 4806.04 |
| 40890 | 38.52 | 38.52 | 3923 | 4146.44 |
| 40891 | 41.8 | 41.8 | 4118 | 4464.6 |
| 40892 | 56.61 | 56.61 | 5982 | 5901.17 |
| 40893 | 51.5 | 51.5 | 5561 | 5405.5 |
| 40894 | 48.15 | 48.15 | 4855 | 5080.55 |
| 40895 | 35.84 | 35.84 | 3927 | 3886.48 |
| 40896 | 49.68 | 49.68 | 5207 | 5228.96 |
| 40897 | 41.04 | 41.04 | 4233 | 4390.88 |
| 40898 | 47.3 | 47.3 | 4888 | 4998.1 |
| 40899 | 47.7 | 47.7 | 4982 | 5036.9 |
| 40900 | 49.68 | 49.68 | 4862 | 5228.96 |
| 40901 | 47.46 | 47.46 | 3932 | 5013.62 |
| 40902 | 36.3 | 36.3 | 3802 | 3931.1 |
| 40903 | 39.78 | 39.78 | 4028 | 4268.66 |
| 40904 | 55.12 | 55.12 | 5494 | 5756.64 |
| 40905 | 46.2 | 46.2 | 4427 | 4891.4 |
| 40906 | 46.35 | 46.35 | 4719 | 4905.95 |
| 40907 | 45.76 | 45.76 | 4622 | 4848.72 |
| 40908 | 41.81 | 41.81 | 4326 | 4465.57 |
| 40909 | 64.13 | 64.13 | 6025 | 6630.61 |
| 40910 | 60.99 | 60.99 | 6346 | 6326.03 |
| 40911 | 49.05 | 49.05 | 5150 | 5167.85 |
| 40912 | 40.8 | 40.8 | 4327 | 4367.6 |
| 40913 | 31.32 | 31.32 | 3346 | 3448.04 |
| 40914 | 41.44 | 41.44 | 4219 | 4429.68 |
| 40915 | 43.68 | 43.68 | 4316 | 4646.96 |
| 40916 | 39.24 | 39.24 | 3802 | 4216.28 |
| 40917 | 37.1 | 37.1 | 3687 | 4008.7 |
| 40918 | 37.45 | 37.45 | 3600 | 4042.65 |
| 40919 | 65.55 | 65.55 | 6773 | 6768.35 |

| | | | | |
|-------|-------|-------|------|---------|
| 40920 | 67.58 | 67.58 | 7160 | 6965.26 |
| 40921 | 63.24 | 63.24 | 6935 | 6544.28 |
| 40922 | 52.5 | 52.5 | 5519 | 5502.5 |
| 40923 | 51.06 | 51.06 | 4946 | 5362.82 |
| 40924 | 73.03 | 73.03 | 7028 | 7493.91 |
| 40925 | 77.04 | 77.04 | 8060 | 7882.88 |
| 40926 | 82.84 | 82.84 | 9008 | 8445.48 |
| 40927 | 81.62 | 81.62 | 8752 | 8327.14 |
| 40928 | 72.8 | 72.8 | 7941 | 7471.6 |
| 40929 | 61.05 | 61.05 | 6511 | 6331.85 |
| 40930 | 46.2 | 46.2 | 5227 | 4891.4 |
| 40931 | 55.5 | 55.5 | 5975 | 5793.5 |
| 40932 | 47.84 | 47.84 | 5284 | 5050.48 |
| 40933 | 43.29 | 43.29 | 4672 | 4609.13 |
| 40934 | 47.96 | 47.96 | 4923 | 5062.12 |
| 40935 | 49.72 | 49.72 | 5169 | 5232.84 |
| 40936 | 64.38 | 64.38 | 6124 | 6654.86 |
| 40937 | 64.2 | 64.2 | 6097 | 6637.4 |
| 40938 | 45.58 | 45.58 | 4775 | 4831.26 |
| 40939 | 40.33 | 40.33 | 4564 | 4322.01 |
| 40940 | 41.6 | 41.6 | 4213 | 4445.2 |
| 40941 | 40.4 | 40.4 | 4490 | 4328.8 |
| 40942 | 45.45 | 45.45 | 4770 | 4818.65 |
| 40943 | 48.15 | 48.15 | 4410 | 5080.55 |
| 40944 | 39.59 | 39.59 | 3905 | 4250.23 |
| 40945 | 57.2 | 57.2 | 5432 | 5958.4 |
| 40946 | 59.36 | 59.36 | 6243 | 6167.92 |
| 40947 | 50.6 | 50.6 | 5291 | 5318.2 |
| 40948 | 62.7 | 62.7 | 6625 | 6491.9 |
| 40949 | 76.16 | 76.16 | 7983 | 7797.52 |
| 40950 | 72.6 | 72.6 | 7264 | 7452.2 |
| 40951 | 53.55 | 53.55 | 5947 | 5604.35 |
| 40952 | 53.04 | 53.04 | 5569 | 5554.88 |
| 40953 | 43.26 | 43.26 | 4281 | 4606.22 |
| 40954 | 41.04 | 41.04 | 4381 | 4390.88 |
| 40955 | 42.4 | 42.4 | 4524 | 4522.8 |
| 40956 | 53 | 53 | 5111 | 5551 |
| 40957 | 48.41 | 48.41 | 4710 | 5105.77 |
| 40958 | 42.9 | 42.9 | 3800 | 4571.3 |
| 40959 | 38.5 | 38.5 | 4107 | 4144.5 |
| 40960 | 44.85 | 44.85 | 4691 | 4760.45 |
| 40961 | 52 | 52 | 4881 | 5454 |
| 40962 | 50.29 | 50.29 | 4704 | 5288.13 |
| 40963 | 68.32 | 68.32 | 6193 | 7037.04 |
| 40964 | 58.86 | 58.86 | 5182 | 6119.42 |
| 40965 | 55.5 | 55.5 | 5257 | 5793.5 |
| 40966 | 52.5 | 52.5 | 5141 | 5502.5 |
| 40967 | 45.2 | 45.2 | 4462 | 4794.4 |
| 40968 | 37.8 | 37.8 | 4220 | 4076.6 |
| 40969 | 40.28 | 40.28 | 3828 | 4317.16 |
| 40970 | 46.2 | 46.2 | 4413 | 4891.4 |
| 40971 | 65.72 | 65.72 | 5708 | 6784.84 |

| | | | | |
|-------|-------|-------|------|---------|
| 40972 | 57.68 | 57.68 | 5361 | 6004.96 |
| 40973 | 47.3 | 47.3 | 4485 | 4998.1 |
| 40974 | 31.32 | 31.32 | 3312 | 3448.04 |
| 40975 | 51.06 | 51.06 | 5069 | 5362.82 |
| 40976 | 58.76 | 58.76 | 5812 | 6109.72 |
| 40977 | 39.6 | 39.6 | 4890 | 4251.2 |
| 40978 | 23.92 | 23.92 | 2525 | 2730.24 |
| 40979 | 20.9 | 20.9 | 2201 | 2437.3 |
| 40980 | 29.16 | 29.16 | 2967 | 3238.52 |
| 40981 | 18.87 | 18.87 | 2072 | 2240.39 |
| 40982 | 25.2 | 25.2 | 2417 | 2854.4 |
| 40983 | 21 | 21 | 2471 | 2447 |
| 40984 | 2.2 | 2.2 | 1266 | 623.4 |
| 40985 | 9.72 | 9.72 | 1056 | 1352.84 |
| 40986 | 2.28 | 2.28 | 1034 | 631.16 |
| 40987 | 7.7 | 7.7 | 1104 | 1156.9 |
| 40988 | 19.95 | 19.95 | 1838 | 2345.15 |
| 40989 | 18.72 | 18.72 | 1702 | 2225.84 |
| 40990 | 11.66 | 11.66 | 1515 | 1541.02 |
| 40991 | 11.44 | 11.44 | 1364 | 1519.68 |
| 40992 | 24.64 | 24.64 | 2415 | 2800.08 |
| 40993 | 35.52 | 35.52 | 3112 | 3855.44 |
| 40994 | 21.6 | 21.6 | 3479 | 2505.2 |
| 40995 | 24.15 | 24.15 | 2792 | 2752.55 |
| 40996 | 34.98 | 34.98 | 3260 | 3803.06 |
| 40997 | 33.17 | 33.17 | 3589 | 3627.49 |
| 40998 | 26.4 | 26.4 | 2715 | 2970.8 |
| 40999 | 16.05 | 16.05 | 1858 | 1966.85 |
| 41000 | 14.43 | 14.43 | 1586 | 1809.71 |
| 41001 | 22.68 | 22.68 | 2389 | 2609.96 |
| 41002 | 26.78 | 26.78 | 2258 | 3007.66 |
| 41003 | 23.1 | 23.1 | 2003 | 2650.7 |
| 41004 | 22.2 | 22.2 | 2131 | 2563.4 |
| 41005 | 27.84 | 27.84 | 1700 | 3110.48 |
| 41006 | 27.6 | 27.6 | 2507 | 3087.2 |
| 41007 | 42.94 | 42.94 | 2606 | 4575.18 |
| 41008 | 42.51 | 42.51 | 4284 | 4533.47 |
| 41009 | 36.05 | 36.05 | 3950 | 3906.85 |
| 41010 | 28.08 | 28.08 | 2779 | 3133.76 |
| 41011 | 23.52 | 23.52 | 1918 | 2691.44 |
| 41012 | 13.32 | 13.32 | 2401 | 1702.04 |
| 41013 | 25.76 | 25.76 | 1370 | 2908.72 |
| 41014 | 34.41 | 34.41 | 2939 | 3747.77 |
| 41015 | 30.24 | 30.24 | 3406 | 3343.28 |
| 41016 | 26.75 | 26.75 | 2060 | 3004.75 |
| 41017 | 27.04 | 27.04 | 2602 | 3032.88 |
| 41018 | 26 | 26 | 2187 | 2932 |
| 41019 | 30.8 | 30.8 | 1910 | 3397.6 |
| 41020 | 24.96 | 24.96 | 2841 | 2831.12 |
| 41021 | 19.95 | 19.95 | 2283 | 2345.15 |
| 41022 | 14.84 | 14.84 | 1709 | 1849.48 |
| 41023 | 14.43 | 14.43 | 1242 | 1809.71 |

| | | | | |
|-------|-------|-------|------|---------|
| 41024 | 27 | 27 | 1639 | 3029 |
| 41025 | 25.76 | 25.76 | 2125 | 2908.72 |
| 41026 | 22.6 | 22.6 | 2201 | 2602.2 |
| 41027 | 17.76 | 17.76 | 1795 | 2132.72 |
| 41028 | 12.96 | 12.96 | 1487 | 1667.12 |
| 41029 | 17.28 | 17.28 | 1329 | 2086.16 |
| 41030 | 6.36 | 6.36 | 1370 | 1026.92 |
| 41031 | 10.6 | 10.6 | 1051 | 1438.2 |
| 41032 | 19.8 | 19.8 | 1159 | 2330.6 |
| 41033 | 15.12 | 15.12 | 1418 | 1876.64 |
| 41034 | 15.75 | 15.75 | 1020 | 1937.75 |
| 41035 | 17.76 | 17.76 | 1242 | 2132.72 |
| 41036 | 23.76 | 23.76 | 1265 | 2714.72 |
| 41037 | 17.51 | 17.51 | 1499 | 2108.47 |
| 41038 | 7.7 | 7.7 | 1071 | 1156.9 |
| 41039 | 19.21 | 19.21 | 833 | 2273.37 |
| 41040 | 16.2 | 16.2 | 1239 | 1981.4 |
| 41041 | 2.22 | 2.22 | 825 | 625.34 |
| 41042 | 3.12 | 3.12 | 731 | 712.64 |
| 41043 | 19.21 | 19.21 | 690 | 2273.37 |
| 41044 | 17.85 | 17.85 | 1039 | 2141.45 |
| 41045 | 0 | 0 | 836 | 410 |
| 41046 | 0 | 0 | 731 | 410 |
| 41047 | 6.78 | 6.78 | 631 | 1067.66 |
| 41048 | 15.26 | 15.26 | 764 | 1890.22 |
| 41049 | 13.52 | 13.52 | 972 | 1721.44 |
| 41050 | 0 | 0 | 745 | 410 |
| 41051 | 6.54 | 6.54 | 685 | 1044.38 |
| 41052 | 12.48 | 12.48 | 799 | 1620.56 |
| 41053 | 17.44 | 17.44 | 962 | 2101.68 |
| 41054 | 18.53 | 18.53 | 1089 | 2207.41 |
| 41055 | 9.81 | 9.81 | 942 | 1361.57 |
| 41056 | 10.9 | 10.9 | 797 | 1467.3 |
| 41057 | 23.31 | 23.31 | 928 | 2671.07 |
| 41058 | 19.57 | 19.57 | 1421 | 2308.29 |
| 41059 | 16.16 | 16.16 | 1192 | 1977.52 |
| 41060 | 13.26 | 13.26 | 954 | 1696.22 |
| 41061 | 10.4 | 10.4 | 778 | 1418.8 |
| 41062 | 8.24 | 8.24 | 638 | 1209.28 |
| 41063 | 2.12 | 2.12 | 904 | 615.64 |
| 41064 | 2.06 | 2.06 | 663 | 609.82 |
| 41065 | 0 | 0 | 657 | 410 |
| 41066 | 0 | 0 | 641 | 410 |
| 41067 | 0 | 0 | 629 | 410 |
| 41068 | 0 | 0 | 595 | 410 |
| 41069 | 0 | 0 | 534 | 410 |
| 41070 | 16.1 | 16.1 | 611 | 1971.7 |
| 41071 | 15.26 | 15.26 | 934 | 1890.22 |
| 41072 | 2.24 | 2.24 | 720 | 627.28 |
| 41073 | 2.2 | 2.2 | 621 | 623.4 |
| 41074 | 0 | 0 | 776 | 410 |
| 41075 | 2.16 | 2.16 | 682 | 619.52 |

| | | | | |
|-------|------|------|-----|---------|
| 41076 | 3.27 | 3.27 | 631 | 727.19 |
| 41077 | 0 | 0 | 617 | 410 |
| 41078 | 6.36 | 6.36 | 643 | 1026.92 |
| 41079 | 6.42 | 6.42 | 751 | 1032.74 |
| 41080 | 5.5 | 5.5 | 750 | 943.5 |
| 41081 | 6.24 | 6.24 | 733 | 1015.28 |
| 41082 | 4.2 | 4.2 | 665 | 817.4 |
| 41083 | 3.18 | 3.18 | 629 | 718.46 |
| 41084 | 5.3 | 5.3 | 626 | 924.1 |
| 41085 | 0 | 0 | 633 | 410 |
| 41086 | 0 | 0 | 644 | 410 |
| 41087 | 0 | 0 | 662 | 410 |
| 41088 | 0 | 0 | 652 | 410 |
| 41089 | 0 | 0 | 621 | 410 |
| 41090 | 0 | 0 | 582 | 410 |

| | | | | |
|--------|---------|---------|--------|---------|
| Totals | 9028.98 | 9028.98 | 918040 | 1025871 |
|--------|---------|---------|--------|---------|

* Volumes include interruptible and transportation volumes except for transportation volumes that are not located behind MERC citygates.

** Design Model numbers are used to calculate firm volumes only

MINNESOTA ENERGY RESOURCES - PNG
Customer Counts by PGAC Class - July 1, 2011 through June 30, 2012

| | Tariff | 40725 | 40757 | 40789 | 40821 | 40853 | 40885 | 40917 | 40949 | 40982 | 41014 | 41046 | 41078 |
|------------|------------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|
| Rate | Rate | Average | Average | Average | Average | Average | Average | Average | Average | Average | Average | Average | Average |
| Class | Designatio | Customers | Customers | Customers | Customers | Customers | Customers | Customers | Customers | Customers | Customers | Customers | Customers |
| Residentia | MN006 | 4890 | 4829 | 4772 | 4825 | 4938 | 5030 | 5046 | 5069 | 5091 | 5077 | 5099 | 5034 |
| Residentia | MN005 | 35 | 34 | 33 | 33 | 35 | 35 | 35 | 35 | 35 | 35 | 34 | 34 |
| Commerci | MN052/07 | 449 | 443 | 440 | 443 | 445 | 464 | 461 | 456 | 466 | 471 | 507 | 505 |
| Commerci | MN062/07 | 514 | 509 | 509 | 508 | 517 | 519 | 520 | 526 | 523 | 522 | 481 | 477 |
| SV-Joint | MN2D706 | 5 | 5 | 5 | 5 | 5 | 5 | 3 | 3 | 3 | 3 | 3 | 3 |
| SV-Interru | MN127 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 |
| Transport | MN709/83I | 4 | 3 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 |
| Total | | 5902 | 5828 | 5768 | 5823 | 5949 | 6062 | 6074 | 6098 | 6127 | 6117 | 6133 | 6062 |

Futures Contracts WACOG

GLGT

| 41223 | | | | 30 | | | | 41249 | | | | 31 | | | | 40549 | | | | 31 | | | | | |
|-------|-----------|----------|----------|---------|----------|-----------|----------|-----------|----------|----------|---------|----------|-----------|----------|-----------|----------|----------|---------|----------|-----------|----------|--------|-------|-------|-----------|
| PLGT | Financial | Purchase | Total | | Index | Over/(Und | Purchase | Financial | Purchase | Total | | Index | Over/(Und | Purchase | Financial | Purchase | Total | | Index | Over/(Und | Purchase | Total | | Index | Over/(Und |
| Date | Volume | Price | Cost | Indexes | Cost | Market | Date | Volume | Price | Cost | Indexes | Cost | Market | Date | Volume | Price | Cost | Indexes | Cost | Market | Date | Volume | Price | Cost | Market |
| 41054 | 4239.129 | 2.996 | 12700.43 | 3.776 | 16006.95 | -3306.52 | 41058 | 5915.494 | 3.176 | 18787.61 | 4.088 | 24182.54 | -5394.93 | 41059 | 824.7426 | 3.264 | 2691.96 | 4.1895 | 3455.259 | -763.299 | | | | | |
| 41054 | 6300.434 | 2.997 | 4886.411 | 3.776 | 6165.519 | -1270.11 | 41089 | 4225.353 | 3.329 | 14066.2 | 4.088 | 1723.24 | -3027.04 | 05/30/12 | 1639.485 | 3.265 | 5385.568 | 4.1895 | 6910.518 | -1524.95 | | | | | |
| 41088 | 5890.566 | 3.017 | 17708.48 | 3.776 | 22163.48 | -4475.1 | 41089 | 1690.142 | 3.331 | 5629.862 | 4.088 | 6908.299 | -1278.44 | 05/30/12 | 5360.824 | 3.266 | 17598.45 | 4.1895 | 22459.17 | -4954.92 | | | | | |
| 41121 | 4891.305 | 3.313 | 16204.89 | 3.776 | 18469.57 | -1264.61 | 41120 | 5915.494 | 3.6 | 21295.78 | 4.088 | 1782.54 | -2886.76 | 41088 | 824.7426 | 3.425 | 2824.743 | 4.1895 | 3455.259 | -630.516 | | | | | |
| 41121 | 652.173 | 3.314 | 2161.301 | 3.776 | 2462.605 | -301.304 | 41143 | 4647.886 | 3.288 | 15282.25 | 4.088 | 19000.56 | -3718.31 | 41088 | 3298.97 | 3.427 | 11305.57 | 4.1895 | 13821.04 | -2515.46 | | | | | |
| 41136 | 4565.217 | 2.988 | 13640.87 | 3.776 | 17238.26 | -3597.39 | 41172 | 4225.353 | 3.248 | 17323.95 | 4.088 | 17273.24 | -3549.3 | 41088 | 3298.97 | 3.428 | 11308.87 | 4.1895 | 13821.04 | -2512.17 | | | | | |
| 41173 | 4239.129 | 3.065 | 12992.93 | 3.776 | 16006.95 | -1044.02 | 41205 | 3380.28 | 3.863 | 13058.02 | 4.088 | 13818.59 | -760.563 | 41117 | 7013.309 | 3.573 | 25047.83 | 4.1895 | 29369.69 | -4321.86 | | | | | |
| 41190 | 3913.044 | 3.408 | 13335.65 | 3.776 | 14777.65 | -3110.12 | | | | | | | | 41144 | 6597.938 | 3.426 | 22604.53 | 4.1895 | 27642.06 | -5037.53 | | | | | |
| | | | | | | | | | | | | | | 41171 | 5773.195 | 3.39 | 19571.13 | 4.1895 | 24186.8 | -4615.67 | | | | | |
| | | | | | | | | | | | | | | 41207 | 5360.824 | 3.904 | 20928.66 | 4.1895 | 22459.17 | -1530.52 | | | | | |

| | | | | | | | | | | | | |
|-------|-------|----------|--------|----------|-------|----------|--------|----------|-------|----------|--------|----------|
| Total | 30000 | 93630.97 | 113280 | -19649 | 30000 | 101843.7 | 122640 | -20796.3 | 40000 | 139177.3 | 167580 | -28402.7 |
| WACOG | | 3.121033 | 3.776 | -0.65497 | | 3.394789 | 4.088 | -0.69321 | | 3.479433 | 4.1895 | -0.71007 |

| 41316 | | | | | | 41339 | | | | | | 41351 | | | | | | 41363 | | | | | |
|---------------|-----------------|----------------|------------|------------|---------------------|---------------|-----------------|----------------|------------|------------|---------------------|---------------|-----------------|----------------|------------|------------|---------------------|---------------|-----------------|----------------|------------|------------|---------------------|
| Purchase Date | Physical Volume | Purchase Price | Total Cost | Index Cost | Over/(Under) Market | Purchase Date | Physical Volume | Purchase Price | Total Cost | Index Cost | Over/(Under) Market | Purchase Date | Physical Volume | Purchase Price | Total Cost | Index Cost | Over/(Under) Market | Purchase Date | Physical Volume | Purchase Price | Total Cost | Index Cost | Over/(Under) Market |
| 41058 | 6600 | 3.34 | 22044 | 4.1825 | 27604.5 | -5560.5 | 41059 | 2608.697 | 3.258 | 8499.133 | 4.0675 | 10610.87 | -2111.74 | 20188.06 | 3.20601 | 84723.14 | 4.054878 | 81860.13 | -17137 | | | | |
| 41089 | 6000008 | 3.484 | 2090.403 | 4.1825 | 2509.503 | -419.101 | 41059 | 2602.868 | 3.26 | 10630.43 | 4.0675 | 13263.58 | -2633.15 | 11366.14 | 3.260474 | 37059.01 | 4.057082 | 46113.36 | -9054.35 | | | | |
| 41089 | 6000 | 3.485 | 20910 | 4.1825 | 25095 | -4185 | 41087 | 5869.565 | 3.461 | 20314.56 | 4.0675 | 23874.45 | -3558.89 | 24790.1 | 3.310651 | 82071.36 | 4.054095 | 100501.4 | -18430 | | | | |
| 41109 | 6000008 | 3.526 | 2115.603 | 4.1825 | 2509.503 | -393.901 | 41116 | 5543.479 | 3.612 | 20023.05 | 4.0675 | 22548.1 | -2525.05 | 17775.02 | 3.514148 | 62464.07 | 4.03065 | 71164.97 | -8700.91 | | | | |
| 41109 | 6000 | 3.528 | 21168 | 4.1825 | 25095 | -3927 | 41145 | 4891.304 | 3.362 | 16444.56 | 4.0675 | 19895.38 | -3450.81 | 19490.33 | 3.404851 | 66361.68 | 4.118287 | 80274.58 | -13912.9 | | | | |
| 41138 | 6000008 | 3.405 | 2043.003 | 4.1825 | 2509.503 | -466.501 | 41170 | 4239.129 | 3.416 | 14480.87 | 4.0675 | 17242.66 | -2761.79 | 16928.67 | 3.260596 | 5917.55 | 4.021858 | 68084.7 | -12821.1 | | | | |
| 41138 | 4200 | 3.406 | 14305.2 | 4.1825 | 17566.5 | -3261.3 | 41207 | 3586.957 | 3.882 | 13924.57 | 4.0675 | 14589.95 | -665.381 | 22416.68 | 3.538819 | 79320.58 | 4.075166 | 91351.68 | -12023.1 | | | | |
| 41169 | 3000.01 | 3.46 | 10380 | 4.1825 | 12547.51 | -2167.5 | | | | | | | | 13510.98 | 3.428336 | 46320.19 | 4.068188 | 54965.22 | -8645.03 | | | | |
| 41204 | 2400 | 3.926 | 9422.402 | 4.1825 | 10038 | -615.6 | | | | | | | | 8173.196 | 3.547393 | 28993.53 | 4.187445 | 34224.8 | -5231.27 | | | | |
| | | | | | | | | | | | | | | 5360.824 | 3.904 | 20928.66 | 4.1895 | 22459.17 | -1530.52 | | | | |

| | | | | | | | | | | | | |
|-------|-------|----------|--------|----------|-------|----------|--------|----------|--------|----------|---------|---------|
| Total | 30000 | 104478.6 | 125475 | -20996.4 | 30000 | 104317.2 | 122025 | -17707.8 | 160000 | 543447.7 | 651000 | -107552 |
| WACOG | | 3.48262 | 4.1825 | -0.69988 | | 3.477239 | 4.0675 | -0.59026 | | 3.396548 | 4.06875 | -0.6722 |

MINNESOTA ENERGY RESOURCES - PNG
Projected Storage Cost - November 2012 through March 2013

| Month/ Year | K#118657 NNG Storage | Storage K#123780 LS Power | Storage K#123781 LS Power | Total NNG Storage | WACOG | | | K#118657 NNG Storage Cost | K#123780 NNG Storage Cost | K#123781 NNG Storage Cost | Total NNG Storage Cost | GLGT/VGT | | |
|----------------|----------------------------|------------------------------------|------------------------------------|-------------------------|---------------------------------------|---------------------------------------|---------------------------------------|------------------------------------|------------------------------------|------------------------------------|---------------------------------|--------------------------------|--------------------|------------------------------------|
| | | | | | Projected K#118657 NNG WACOG | Projected K#123780 NNG WACOG | Projected K#123781 NNG WACOG | | | | | GLGT/VGT Centra AECO Sto | Centra AECO Sto | GLGT/VGT Centra AECO Storage |
| 41219 | 455259 | 73125 | 19500 | 547884 | 2.8422 | 2.8422 | 2.8422 | 1293937 | 207835.9 | 55422.9 | 1557196 | 85290 | 2.1432 | 182793.5 |
| 41250 | 1143984 | 183750 | 49000 | 1376734 | 2.8422 | 2.8422 | 2.8422 | 3251431 | 522254.3 | 139267.8 | 3912953 | 231756 | 2.1432 | 496699.5 |
| 41282 | 1143984 | 183750 | 49000 | 1376734 | 2.8422 | 2.8422 | 2.8422 | 3251431 | 522254.3 | 139267.8 | 3912953 | 231756 | 2.1432 | 496699.5 |
| 41314 | 1143984 | 183750 | 49000 | 1376734 | 2.8422 | 2.8422 | 2.8422 | 3251431 | 522254.3 | 139267.8 | 3912953 | 209328 | 2.1432 | 448631.8 |
| 41343 | 455259 | 73125 | 19500 | 547884 | 2.8422 | 2.8422 | 2.8422 | 1293937 | 207835.9 | 55422.9 | 1557196 | 96379 | 2.1432 | 206559.5 |
| Total | 4342470 | 697500 | 186000 | 5225970 | 2.8422 | 2.8422 | 79.85619 | 12342168 | 1982435 | 528649.2 | 14853252 | 854509 | 2.1432 | 1831384 |

| Month/ Year | NNG Storage Volume | NNG Indexes Price | NNG Indexes Cost | AECO Storage Volume | Emerson Indexes Price | Emerson Indexes Cost | Total AECO Sto Volumes | Total AECO Sto WACOG | Total AECO Sto Cost | Total AECO Sto WACOG | Total Emerson Cost |
|--|--------------------------|-------------------------|------------------------|---------------------------|-----------------------------|----------------------------|---------------------------------|----------------------------|---------------------------|----------------------------|--------------------------|
| 41219 | 547884 | 3.6435 | 1996215 | 85290 | 3.776 | 322055 | 85290 | 2.1432 | 182793.5 | 3.776 | 322055 |
| 41250 | 1376734 | 3.983 | 5483532 | 231756 | 4.088 | 947418.5 | 231756 | 2.1432 | 496699.5 | 4.088 | 947418.5 |
| 41282 | 1376734 | 4.0745 | 5609503 | 231756 | 4.1895 | 970941.8 | 231756 | 2.1432 | 496699.5 | 4.1895 | 970941.8 |
| 41314 | 1376734 | 4.07 | 5603307 | 209328 | 4.1825 | 875514.4 | 209328 | 2.1432 | 448631.8 | 4.1825 | 875514.4 |
| 41343 | 547884 | 3.99 | 2186057 | 96379 | 4.0675 | 392021.6 | 96379 | 2.1432 | 206559.5 | 4.0675 | 392021.6 |
| Total | 5225970 | 3.995165 | 20878614 | 854509 | 4.105224 | 3507951 | 854509 | 2.1432 | 1831384 | 4.105224 | 3507951 |
| Max NNG Storage (Storage plan withdrawals through April) | | | | | 5225970 | 5619321 | 10/31/11 Storage Balance - NNG | 5619321 | 1 | 5225970 | |
| Max AECO Storage | | | | | 854509 | | 10/31/11 Storage Balance - AECO | 947820 | | | |

| Month/ Year | K#118657 NNG Storage | Storage K#123780 LS Power | Storage K#123781 LS Power | Total NNG Storage | NNG PNG Volumes | NNG NMU Volumes | NNG Total Volumes | Projected K#118657 NNG WACOG | Projected K#123780 NNG WACOG | Projected K#123781 NNG WACOG | WACOG NNG Cost | WACOG NNG Cost | WACOG NNG Cost | NNG Indexes Price | NNG Index Cost | NNG Index Cost | NNG Index Cost |
|----------------|----------------------------|------------------------------------|------------------------------------|-------------------------|-----------------------|-----------------------|-------------------------|---------------------------------------|---------------------------------------|---------------------------------------|----------------------|----------------------|----------------------|-------------------------|----------------------|----------------------|----------------------|
| | | | | | | | | | | | | | | | | | |
| 41219 | 455259 | 73125 | 19500 | 547884 | 487213.2 | 60670.82 | 547884 | 2.8422 | 2.8422 | 2.8422 | 1384757 | 172438.6 | 1557196 | 3.6435 | 1775161 | 221054.1 | 1996215 |
| 41250 | 1143984 | 183750 | 49000 | 1376734 | 1224279 | 152454.9 | 1376734 | 2.8422 | 2.8422 | 2.8422 | 3479646 | 433307.2 | 3912953 | 3.983 | 4876304 | 607227.7 | 5483532 |
| 41282 | 1143984 | 183750 | 49000 | 1376734 | 1224279 | 152454.9 | 1376734 | 2.8422 | 2.8422 | 2.8422 | 3479646 | 433307.2 | 3912953 | 4.0745 | 4988325 | 621177.4 | 5609503 |
| 41314 | 1143984 | 183750 | 49000 | 1376734 | 1224279 | 152454.9 | 1376734 | 2.8422 | 2.8422 | 2.8422 | 3479646 | 433307.2 | 3912953 | 4.07 | 4982816 | 620491.3 | 5603307 |
| 41343 | 455259 | 73125 | 19500 | 547884 | 487213.2 | 60670.82 | 547884 | 2.8422 | 2.8422 | 2.8422 | 1384757 | 172438.6 | 1557196 | 3.99 | 1943981 | 242076.6 | 2186057 |
| Total | 4342470 | 697500 | 186000 | 5225970 | 4647264 | 578706.3 | 5225970 | 2.8422 | 2.8422 | 2.8422 | 13208453 | 1644799 | 14853252 | 3.995165 | 18566587 | 2312027 | 20878614 |

| Month/ Year | AECO Storage | GLGT PNG Volumes | GLGT NMU Volumes | VGT PNG Volumes | VGT NMU Volumes | Centra NMU Volumes | Total AECO Sto Volumes | Projected Emerson Index Price | GLGT PNG Cost | GLGT NMU Cost | VGT PNG Cost | VGT NMU Cost | Centra NMU Cost | Total AECO Storage Cost |
|----------------|-----------------|------------------------|------------------------|-----------------------|-----------------------|--------------------------|------------------------------|--|---------------------|---------------------|--------------------|--------------------|-----------------------|----------------------------------|
| | | | | | | | | | | | | | | |
| 41219 | 85290 | 12351.49 | 24049.04 | 12434.87 | 19722.89 | 16745.71 | 85304 | 2.1432 | 26471.72 | 51541.9 | 26650.42 | 42270.09 | 35889.41 | 182823.5 |
| 41250 | 231756 | 33192.83 | 64628.27 | 33416.9 | 53002.37 | 45001.64 | 229242 | 2.1432 | 71138.87 | 138511.3 | 71619.09 | 113594.7 | 96447.52 | 491311.5 |
| 41282 | 231756 | 33192.83 | 64628.27 | 33416.9 | 53002.37 | 45001.64 | 229242 | 2.1432 | 71138.87 | 138511.3 | 71619.09 | 113594.7 | 96447.52 | 491311.5 |
| 41314 | 209328 | 31051.33 | 60458.65 | 31260.94 | 49582.81 | 42098.27 | 214452 | 2.1432 | 66549.2 | 129575 | 66998.45 | 106265.9 | 90225.02 | 459613.5 |
| 41343 | 96379 | 13950.16 | 27161.74 | 14044.33 | 22275.64 | 18913.13 | 96345 | 2.1432 | 29897.99 | 58213.03 | 30099.81 | 47741.16 | 40534.61 | 206486.6 |
| Total | 854509 | 123738.6 | 240926 | 124573.9 | 197586.1 | 167760.4 | 854585 | 2.143391 | 265196.6 | 516352.5 | 266986.9 | 423466.5 | 359544.1 | 1831547 |

| Month/ Year | AECO Storage | GLGT PNG Volumes | GLGT NMU Volumes | VGT PNG Volumes | VGT NMU Volumes | Centra NMU Volumes | Total AECO Storage Volumes | Projected Emerson Index Price | GLGT PNG Cost | GLGT NMU Cost | VGT PNG Cost | VGT NMU Cost | Centra NMU Cost | Total AECO Storage Cost |
|----------------|-----------------|------------------------|------------------------|-----------------------|-----------------------|--------------------------|-------------------------------------|--|---------------------|---------------------|--------------------|--------------------|-----------------------|----------------------------------|
| | | | | | | | | | | | | | | |
| 41219 | 85290 | 12351.49 | 24049.04 | 12434.87 | 19722.89 | 16745.71 | 85304 | 3.776 | 46639.24 | 90809.17 | 46954.08 | 74473.62 | 63231.8 | 322107.9 |
| 41250 | 231756 | 33192.83 | 64628.27 | 33416.9 | 53002.37 | 45001.64 | 229242 | 4.088 | 135692.3 | 264200.4 | 136608.3 | 216673.7 | 183966.7 | 937141.3 |
| 41282 | 231756 | 33192.83 | 64628.27 | 33416.9 | 53002.37 | 45001.64 | 229242 | 4.1895 | 139061.3 | 270760.1 | 140000.1 | 222053.4 | 188534.4 | 960409.4 |
| 41314 | 209328 | 31051.33 | 60458.65 | 31260.94 | 49582.81 | 42098.27 | 214452 | 4.1825 | 129872.2 | 252868.3 | 130748.9 | 207380.1 | 176076 | 896945.5 |
| 41343 | 96379 | 13950.16 | 27161.74 | 14044.33 | 22275.64 | 18913.13 | 96345 | 4.0675 | 56742.28 | 110480.4 | 57125.32 | 90606.18 | 76929.15 | 391883.3 |
| Total | 854509 | 123738.6 | 240926 | 124573.9 | 197586.1 | 167760.4 | 854585 | 4.105852 | 508007.3 | 989118.3 | 511436.7 | 811187 | 688738.1 | 3508487 |

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