

October 21, 2016

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

**RE: Response Comments of the Minnesota Department of Commerce, Division of Energy Resources**

Docket Nos. G999/AA-15-612, G004/AA-15-794, G001/AA-15-796, G022/AA-15-797, G008/AA-15-800, G011/AA-15-801, G011/AA-15-802, G011/AA-15-803, G002/AA-15-809

Dear Mr. Wolf:

This letter serves as the Response Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Review of 2014-2015 Annual Automatic Adjustment (AAA) Reports and Natural Gas Utilities' 2014-2015 Purchased Gas Adjustment (PGA) True-Up Filings

On July 1, 2016, the Department filed its Review of the 2014-2015 AAA Reports with the Minnesota Public Utilities Commission (Commission).

On July 11, 2016, MERC submitted its Reply Comments, providing additional information requested by the Department regarding how the Company could achieve more accurate recovery of Bison and Northern Border Pipeline costs on a going-forward basis.

MERC stated that Orders issued in Docket Nos. G007/M-10-116 and G011/M-10-1168 (Demand Entitlement filings for 2010) approved shifting the future recovery of Bison and Northern Border Pipeline costs from the demand rate factor to the commodity rate factor effective with the February 2015 monthly PGA filing. The Orders also approved shifting the recovery of the Bison and Northern Border Pipeline costs for the entire June through July AAA period in the then-upcoming AAA filing (MERC's 2014-2015 AAA Report). This shift created a one-time over-recovery of approximately \$9,000,000 of demand costs and a similar one-time under-recovery of commodity costs. MERC stated that it hopes the discrepancy will be alleviated going forward.

MERC also stated that its Consolidated PGA was not affected by this shift of costs, as the Bison and Northern Border Pipeline costs are allocated entirely to its NNG PGA.

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The Department appreciates the additional information provided by MERC in its Reply Comments and concludes that the Company provided a reasonable discussion regarding future recovery of Bison and Northern Border Pipeline costs. The Department will continue to monitor this issue in future AAA filings to ensure that the shift in costs does not continue to result in large over- or under-recoveries.

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

Sincerely,

/s/ ANGELA BYRNE  
Financial Analyst  
651-539-1820

/s/ MICHAEL RYAN  
Rates Analyst  
651-539-1807

AB/MR/ja

## CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce  
Response to Reply Comments**

**Docket No. G999/AA-15-612; G004/AA-15-794; G001/AA-15-796; G022/AA-15-797; G008/AA-15-800; G011/AA-15-801; G011/AA-15-802; G011/AA-15-803; and G002/AA-15-809**

Dated this 21<sup>st</sup> day of October 2016

**/s/Sharon Ferguson**

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