



July 10, 2020

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VIA E-FILING

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101

**Re: In the Matter of an Inquiry into the Financial Effects of COVID-19 on Natural Gas and Electric Utilities
PUC Docket Number: E,G-999/CI-20-425**

**In the Matter of the Petition of the Minnesota Rate Regulated Electric and Gas Utilities¹ for Authorization to Track Expenses Resulting From the Effects of COVID-19 and Record and Defer Such Expenses into a Regulatory Asset
PUC Docket Number: E,G-999/M-20-427**

Dear Mr. Seuffert:

The Minnesota Large Industrial Group (“MLIG”) submits this brief letter comment in the above-mentioned dockets pursuant to the Minnesota Public Utilities Commission’s (the “Commission”) May 20, 2020, Notice of Comment Period (“Notice”).² The Notice seeks comments on several different issues including: (1) proper accounting methodologies; (2) clear identification of costs and revenues; (3) additional Commission actions; (4) quarterly reporting guidelines; (5) additional conditions or caveats for granting of authority to establish regulatory assets; (6) more information on the financial effects of COVID-19 on the utilities; and (7) other issues or concerns.³ MLIG is grateful to the Commission for soliciting feedback from stakeholders on these topics. However, MLIG, like various other stakeholders in this proceeding, remains concerned about the Commission’s general approval of the Utilities’ request for deferred accounting prior to receiving stakeholder comments and without an understanding of the scope or amount of costs deferred. To be sure, the topics open for comment indicate that the Commission itself understands that various refinements must be made.

¹ In their petition, the Minnesota Rate-Regulated Electric and Gas Utilities (the “Utilities”) are identified as being, in alphabetical order: CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, Dakota Electric Association, Great Plains Natural Gas Co., Greater Minnesota Gas, Inc., Minnesota Energy Resources Corporation, Minnesota Power, Northern States Power Company d/b/a Xcel Energy and Otter Tail Power.

² Notice of Comment Period (May 20, 2020) (eDocket No. 20205-163339-02 or 20205-163339-01).

³ *Id.*

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Though MLIG appreciates the Commission's attempt to now seek stakeholder feedback, MLIG notes that there is insufficient information for stakeholders to use to craft specific recommendations beyond the general authority for deferred accounting. For example, it is not clear whether the Utilities are seeking some form of *de facto* decoupling mechanism under part 3.3 of Attachment A.⁴ Nor has any specificity on the amount of expenses been provided. As such, MLIG stresses that it will be imperative for the Commission to carefully evaluate the merits of any specific utility request for cost recovery through thorough stakeholder feedback.

Due to concerns about the precedent set in these dockets, MLIG reserves the right, with or without comment period, to submit comments on any utility-specific proposal pertaining to the Commission's allowance of deferred accounting of COVID-19-related expenses. Such comments may be filed by MLIG in its entirety or by one of the utility-specific large power customer groups of which MLIG members are also part of (*i.e.*, the Large Power Intervenors, the Xcel Large Industrials, or the Super Large Gas Intervenors).

By copy of this letter, all parties have been served. A Certificate of Service is also attached.

Very truly yours,

Stoel Rives LLP

/s/ Andrew P. Moratzka

Andrew P. Moratzka

APM:cal
Attachments

cc: Service Lists

107267013.4 0064592-00007

⁴ See Joint Petitioners' Comments Attachment A (June 10, 2020) (eDocket No. 20206-163858-02).

CERTIFICATE OF SERVICE

I, Cheryl Long, hereby certify that I have this day served a true and correct copy of the following document(s) to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States Mail at Minneapolis, Minnesota.

LETTER COMMENT OF THE MINNESOTA LARGE INDUSTRIAL GROUP

In the Matter of an Inquiry into the Financial
Effects of COVID-19 on Natural Gas and
Electric Utilities
PUC Docket Number: E,G-999/CI-20-425

In the Matter of the Petition of the Minnesota
Rate Regulated Electric and Gas Utilities for
Authorization to Track Expenses Resulting
From the Effects of COVID-19 and Record
and Defer Such Expenses into a Regulatory
Asset
PUC Docket Number: E,G-999/M-20-427

Dated this 10th day of July, 2020.

/s/ Cheryl Long
Cheryl Long

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