



LORI SWANSON
ATTORNEY GENERAL

STATE OF MINNESOTA

OFFICE OF THE ATTORNEY GENERAL

SUITE 1400
445 MINNESOTA STREET
ST. PAUL, MN 55101-2131
TELEPHONE: (651) 296-7575

July 22, 2015

Mr. Daniel Wolf, Executive Secretary
Minnesota Public Utilities Commission
350 Metro Square Building
121 7th Place East
St. Paul, MN 55101-2147

**Re: In the Matter of the 2013-2014 Annual Automatic Adjustment Reports
Docket No. G999/AA-14-580**

Dear Mr. Wolf:

The Office of the Attorney General—Residential Utilities and Antitrust Division (“OAG”) submits this letter in response to the Notice of Supplemental Response Comment Period issued on July 9, 2015. In its June 26, 2015 Comments, the OAG stated that it is important to develop a metric to measure the performance of interruptible customers during curtailments. In particular, the OAG identified that the analytical method used to measure curtailment performance in the Department’s May 5, 2015 Review¹ could be improved to provide a more critical assessment of curtailment performance. To begin that process, the OAG suggested that utilities provide information comparing the amount of gas that utilities expect to interrupt with the amount of gas that is actually interrupted. This comparison could provide useful information for the Commission to review curtailment performance for both utilities and interruptible customers.

The Department has also requested additional information from utilities in future Automatic Annual Adjustment Reports. After reviewing the Department’s response and discussing the matter with the Department, the OAG agrees that the information requested by the Department is a reasonable starting point for improving curtailment performance metrics. While the data requested in the OAG’s June 26, 2015 Comments would allow additional analysis beyond what the Department has requested, the information requested by the Department will allow parties to begin making improvements in the way curtailment performance is reviewed.

¹ Department of Commerce Review of the 2013-2014 Annual Automatic Adjustment Reports, Docket No. AA-14-580, at 61 (May 5, 2015).

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The frequency of non-compliance with curtailment is an important issue that the Commission should monitor closely, and improving the metrics used to measure curtailment performance is a necessary step toward that goal. For that reason, the Commission should ensure that the information utilities have agreed to produce is used to improve the analysis of curtailment performance in future AAA reviews.

Respectfully submitted,

LORI SWANSON

Attorney General
State of Minnesota

s/ Ryan Barlow

RYAN P. BARLOW

Assistant Attorney General

Atty. Reg. No. 0393534

445 Minnesota Street, Suite 1400

St. Paul, Minnesota 55101-2131

(651) 757-1473 (Voice)

(651) 297-7206 (TTY)

ATTORNEYS FOR OFFICE OF THE
ATTORNEY GENERAL-RESIDENTIAL
UTILITIES AND ANTITRUST DIVISION

AFFIDAVIT OF SERVICE

**RE: In the Matter of the 2013-2014 Annual Automatic Adjustment Reports
Docket No. G999/AA-14-580**

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

I hereby state that on July 22, 2015, I filed with eDockets a letter from the *Office of the Attorney General - Residential Utilities and Antitrust Division* and served the same upon all parties listed on the attached service list by email, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

s/ Judy Sigal
Judy Sigal

Subscribed and sworn to before me
this 22nd day of July, 2015.

s/ Patricia Jotblad
Notary Public

My Commission expires: January 31, 2020.

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck, ND 585014092	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_14-580_G999-AA-14-580
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.	202 S. Main Street Le Sueur, MN 56058	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	800 LaSalle Avenue P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
Michael	Greiveldinger	michaelgreiveldinger@alliantenergy.com	Interstate Power and Light Company	4902 N. Biltmore Lane Madison, WI 53718	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.	202 South Main Street P.O. Box 68 Le Sueur, MN 56058	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
Amber	Lee	ASLee@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	2665 145th St W Rosemount, MN 55068	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
Paul J.	Lehman	paul.lehman@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_14-580_G999-AA-14-580
SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_14-580_G999- AA-14-580