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October 3, 2025

Sasha Bergman  
Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
St. Paul, MN 55101

**VIA ELECTRONIC FILING**

Re: In the Matter of the Annual Service Quality Report for Minnesota Energy Resources Corporation for 2024  
Docket No. G011/M-25-34

**Reply Comments of Minnesota Energy Resources Corporation**

Dear Ms. Bergman

On May 1, 2025, Minnesota Energy Resources Corporation (“MERC” or the “Company”) filed its 2024 Gas Service Quality Report in the above-referenced docket. On September 23, 2025, the Minnesota Department of Commerce, Division of Energy Resources (the “Department”) filed Comments in the above-referenced docket concluding MERC provided all required information and recommending that the Minnesota Public Utilities Commission (“Commission”) accept MERC’s 2024 Annual Service Quality Report.

MERC thanks the Department for its review and is in agreement regarding the Department’s recommendation that the Commission accept MERC’s 2024 Gas Service Quality Report.

MERC submits these Reply Comments to provide corrections to the data referenced in the Department’s September 23, 2025 Comments. These corrections reflect both previously filed corrections submitted by the Company in its annual Gas Service Quality Reporting dockets and corrections to the formulas, data, or labeling reported in the Department’s summary tables in order to accurately reflect the data as reported in MERC’s annual Gas Service Quality Report.

First, with respect to meter reading, the Department’s Table 2 at page 5 incorrectly reports the number of meters and number of meters read by MERC for 2023. The average # of meters in 2023 was 252,878, and the average number of monthly meters read by MERC in 2023 was 242,277.<sup>1</sup> These corrections also impact the 10-year

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<sup>1</sup> Table 2 in the Department’s Comments on MERC’s 2023 Gas Service Quality Report filed last year on September 20, 2024 in Docket No. G011/M-24-34 reflected the correct values for 2023 average number of meters, and average number of meters read by MERC of 252,878 and 242,277, respectively.

average, % change from 10-year average, and the % change from 2023 as reflected in the Department’s Table 2. MERC provides a corrected version of the Department’s Table 2 below, with corrected values shown in red font.

**Department Table 2 with MERC’s Corrections**

Calendar Year	Avg. # of Meters	# of Meters Read - MERC	% of Meters Read - MERC	# of Meters Read by Customers	% of Meters Read by Customers
2023	<b>252,878</b>	<b>242,277</b>	95.81%	7	<0.01%
10-yr Avg.	<b>239,081</b>	<b>229,718</b>	96.00%	917	0.42%
2024	255,334	247,392	96.89%	62	<0.01%
% Chg. From 10-yr Avg.	6.8%	<b>7.7%</b>	0.9%	-93.2%	NA
% Chg. From 2023	<b>1.0%</b>	<b>2.1%</b>	1.1%	785.7%	0.0%

Second, with respect to 2024 data in Table 2A of the Department’s Comments, which reports MERC’s annual number of meters not read for 6-12 months and over 12 months, the value provided for 2024 incorrectly added together the data the Company reported “without farm taps” and “with farm taps” in Attachment 3 to MERC’s 2024 Gas Service Quality Report. The data reported in Attachment 3 “with farm taps” is already inclusive of all customers (i.e., both farm tap and non-farm tap customers). The correct value for 2024 should be 1,947 for the annual total # not read in 6-12 months and 42 for the # not read in >12 months. These corrections also impact the % change from 10-year average and the % change from 2023 as reflected in the Department’s Table 2A. MERC provides a corrected version of the Department’s Table 2A below, with corrected values shown in red font.

**Department Table 2A with MERC’s Corrections**

Calendar Year	# of Meters Unread for 6-12 Months	# of Meters Unread for More than 12 months
2023	2,530	73
10-yr Avg.	3,019	102
2024	<b>1,947</b>	<b>42</b>
% Chg. From 10-yr Avg.	<b>-35.5%</b>	<b>-58.7%</b>
% Chg. From 2023	<b>-23.0%</b>	<b>-42.5%</b>

As noted in MERC’s Gas Service Quality Report and the Department’s Comments, the meter number figures in Table 2A are the sum totals of the number of unread meters

reported for each month in the reporting year and the totals double count meters that remain in an unread status over multiple months.<sup>2</sup>

Third, Table 2C in the Department’s Comments is labeled “Farm Tap Meter Reading Information by Year,” but 2024 reflects data reported for all customers, including both farm-tap and non-farm tap customers. To compute the data for farm-tap only customers, one would need to take the MERC 2024 Gas Service Quality Report Attachment 3 data “with farm taps” and subtract the values “without farm taps.” MERC provides a corrected version of the Department’s Table 2C below. MERC will relabel the data shown in Attachment 3 of its Annual Gas Service Quality Report going forward, such that it is clear what data is being shown; i.e., Meter Reading for Non-Farm Tap customers and Meter Reading for Total MERC (with farm taps).

**Department Table 2C with MERC’s Corrections**

<b>Calendar Year</b>	<b># of Farm Taps</b>	<b># of Customer Read Farm Taps</b>	<b># of Meters Unread for 6-12 Months</b>	<b># of Meters Unread for More than 12 months</b>
2023	1,748	6,759	2,122	68
Prior Average	1,804	7,741	2,059	37
2024	<b>1,667</b>	<b>6,069</b>	<b>1,922</b>	<b>40</b>
% Chg. From Prior Avg.	<b>-7.6%</b>	<b>-21.6%</b>	<b>-6.7%</b>	<b>8.1%</b>
% Chg. From 2023	<b>-4.6%</b>	<b>-10.2%</b>	<b>-9.4%</b>	<b>-41.2%</b>

Fourth, with respect to reporting on customer disconnections, as explained in MERC’s 2024 Gas Service Quality Report and in prior reports:

For data reported prior to 2015, MERC reported the % of customers restored within 24 hours based on those restored within 24 hours of entering a payment plan. In accordance with the Commission’s March 8, 2021 Order Adopting Reports and Requiring Filings in Docket No. E,G999/CI-20-375, MERC now reports using the approved Residential Customer Status Report as the number of customers whose service was restored within 24 hours of initial disconnection. MERC has restated the % of customers restored within 24 hours from 2015 forward based on the number of customers whose

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<sup>2</sup> See Department Comments at 6, note 17. For example, if MERC reported 100 meters unread for 6-12 months in January and February, the sum total of unread meters for those two months would be 200 meters (100 + 100); if February’s unread meter count (100 meters) includes 25 of the same meters that were included in January’s unread meter count, then the 200-meter sum total would recognize these 25 meters twice.

service was restored within 24 hours of initial disconnection. As a result of the modification in reporting, *comparisons cannot be made between current reporting and data reported prior to 2015.*<sup>3</sup>

As a result, the 10-year average for the percentage of disconnections restored in less than 24 hours in Table 3 in the Department's Comments does not reflect an accurate 10-year average.

Additionally, the values reported in the Department's Table 3 for 2015-2019 for the percentage restored in less than 24 hours and for 2016 disconnections are not accurate. MERC provided corrected reporting for these metrics and years in its October 4, 2024 Reply Comments, Attachment R-1, filed in Docket No. G011/M-24-34. These corrected values were also reflected in Table 3 in MERC's 2024 Gas Service Quality Report filed in this docket, and MERC provides a corrected version of the Department's Table 3 below.

**Department Table 3 with MERC's Corrections**

Calendar Year	# of Disconnection Notices Mailed	# of CWR Requests	% of CWR Requests Granted	# of Involuntary Disconnections	% of Inv. Disconnections Restored <24 Hours
2014	87,069	7,014	100%	6,801	88%
2015	71,061	8,748	100%	5,393	n/a
2016	2,690	4,649	100%	<b>632</b>	<b>0.79%</b>
2017	37,208	8,751	100%	1,744	<b>1.83%</b>
2018	58,151	10,014	100%	3,438	<b>1.75%</b>
2019	55,276	8,693	100%	4,961	<b>0.89%</b>
2020	15,805	1,433	100%	338	26%
2021	7,684	414	100%	812	0%
2022	34,262	1,963	100%	4,427	0.29%
2023	61,729	3,361	100%	5,155	4.48%
10-yr Avg.	43,093	<b>5,504</b>	100%	<b>3,370</b>	<b>4.50%</b>
2024	46,572	1,907	100%	3,882	8.63%
% Chg. From 10-yr Avg.	8.07%	<b>-65.4%</b>	0.0%	<b>15.2%</b>	<b>91.6%</b>
% Chg. From 2023	-24.6%	-43.3%	0.0%	-24.7%	93%

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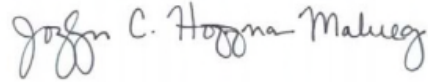
\*\* 8-year average for % of Involuntary Disconnections Restored < 24 Hours (2016-2023)

<sup>3</sup> MERC 2024 Gas Service Quality Report at 6, note 13 (emphasis added).

Ms. Sasha Bergman  
October 3, 2025  
Page 5

Please contact me at (414) 221-4208 or [Joylyn.HoffmanMalueg@wecenergygroup.com](mailto:Joylyn.HoffmanMalueg@wecenergygroup.com) if you have any questions regarding the information in this filing. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink that reads "Joylyn C. Hoffman Malueg". The signature is written in a cursive style with a large initial 'J' and 'M'.

Joylyn C. Hoffman Malueg  
Senior Project Specialist  
Minnesota Energy Resources Corporation

cc: Service List

In the Matter of the Annual Service Quality  
Report of Minnesota Energy Resources  
Corporation for 2024

Docket No. G011/M-25-34

**CERTIFICATE OF SERVICE**

I, Kristin M. Stastny, hereby certify that on the 3rd day of October, 2025 on behalf of Minnesota Energy Resources Corporation (MERC), I electronically filed a true and correct copy of the enclosed Reply Comments on [www.edockets.state.mn.us](http://www.edockets.state.mn.us). This filing was also served via U.S. mail and electronic service as designated on the attached service list.

Dated this 3rd day of October, 2025.

/s/ Kristin M. Stastny

Kristin M. Stastny

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2	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		Yes	M-25-34
3	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-34
4	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-34
5	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	M-25-34
6	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	M-25-34
7	Joylyn C	Hoffman Malueg	joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources		2685 145th St W Rosemount MN, 55068 United States	Electronic Service		No	M-25-34
8	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-34
9	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	M-25-34
10	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	M-25-34
11	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-34

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12	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	M-25-34
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14	Tina E	Wuyts	tina.wuyts@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		PO Box 19001 700 N Adams St Green Bay WI, 54307-9001 United States	Electronic Service		No	M-25-34