

September 28, 2017

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-16-524, G022/AA-16-715, G004/AA-16-719, G002/AA-16-725, G008/AA-16-730, G011/AA-16-732, G011/AA-16-733, G011/AA-16-734

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 the 2015-2016 Annual Automatic Adjustment (AAA) Reports and Natural Gas Utilities' 2015-2016 Purchased Gas Adjustment (PGA) True-Up Filings

On August 11, 2017, the Department filed its Review of the 2015-2016 AAA Reports with the Minnesota Public Utilities Commission (Commission).

On August 16, 2017, Greater Minnesota Gas (GMG) submitted its Reply Comments, providing additional information requested by the Department regarding the Company's "found" gas, or negative Lost and Unaccounted for Gas (LUF). GMG stated that the negative LUF was a result of two main factors:

- An increase in estimated meter reads at the Company's many poultry farm customers at the height of the avian flu quarantine procedures during 2015; and
- Incorrect interstate pipeline metering in GMG's new St. Clair service area.

The Department appreciates the additional information provided by GMG. It appears that the Company's negative LUF is not related to an issue with its reconciliation and true-up process and should not result in ongoing negative LUF.

On August 21 2017, Minnesota Energy Resources Corporation (MERC) submitted its Reply Comments providing additional information regarding the delay in filing its 2015-2016 AAA and True-Up Reports. MERC stated that it frequently engages with its auditors, and that it has modified its monthly

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reconciliation process of gas purchases based on the auditors' recommendation. The Company also stated that it was encouraged by the progress made as of the date of its Reply comments on its 2016-2017 audit. MERC indeed filed its 2016-2017 AAA and True-Up Reports on time in Docket No. G999/AA-17-493. The Department appreciates the additional information provided by MERC.

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-16-524, G022/AA-16-715, G004/AA-16-719, G002/AA-16-725, G008/AA-16-730, G011/AA-16-732, G011/AA-16-733, and G011/AA-16-734**

Dated this 26<sup>th</sup> day of September 2017

**/s/Sharon Ferguson**

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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_16-524_AA-16-524
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Daryll	Fuentes	dfuentes@usg.com	USG Corporation	550 W Adams St  Chicago, IL 60661	Electronic Service	No	OFF_SL_16-733_AA-16-733

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