



Minnesota Energy Resources Corporation
2685 145th Street West
Rosemount, MN 55068
www.minnesotaenergyresources.com

August 19, 2024

Mr. Will Seuffert
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 Petition of Minnesota Energy Resources Corporation for Approval of the 2023 Conservation Improvement Program/Energy Conservation and Optimization Tracker Account, Demand-Side Management Financial Incentive, and Conservation Cost Recovery Adjustment Factor

Docket No. G011/M-24-46

Reply Comments of Minnesota Energy Resources Corporation

Dear Mr. Seuffert:

On August 1, 2024, the Minnesota Department of Commerce, Division of Energy Resources (the "Department") filed Comments in the above-referenced docket recommending approval of Minnesota Energy Resources Corporation's ("MERC" or the "Company") Petition and requesting that the Company provide additional information in Reply Comments. The Department requested the MERC provide the following in its reply comments:

1. An estimate of the average residential customer bill impact for 2025 with the proposed CCRA rate of \$0.01221 per therm; and
2. An updated 2025 December forecasted ending balance incorporating the proposed CCRA rate of \$0.01221 per therm.

The Department also requested that in future years, the Company provide the CIP tracker in an Excel spreadsheet with all formula intact.

The Department also recommended that the Commission take the following action:

1. Approve a DSM financial incentive of \$1,494,587 to be included in the Company' tracker account no sooner than the issue date of the Commission's Order in the instant docket;
2. Approve MERC's 2023 CIP tracker account activities with an ending balance of (\$3,070,173.82);
3. Approve the revised gas CCRA of \$0.01221 per therm for all of MERC's Minnesota customer classes, effective January 1, 2025, or the first billing cycle in the month following the issue date of the Commission's Order in the instant docket, whichever is later; and

4. Approve MERC's customer notification message that reads as follows; and:

Effective January 1, 2025, the CCRA (conservation cost recovery adjustment) has been revised to \$0.01221 per therm. The CCRA is an annual adjustment to true-up under-recovery or over-recovery of CIP (conservation improvement program) expenses.

5. Require MERC to submit a compliance filing with tariff sheets including all necessary calculations within 10 days of the Commission's order in this Docket.

MERC thanks the Department for its review and analysis and is in agreement regarding the Department's recommendations. MERC submits these Reply Comments to respond to the Department's requests for additional information.

First, the Department requested MERC provide an estimate of the average residential customer bill impact with the proposed CCRA rate. Please see Table 1 below. The incremental bill impact of the new CCRA rate is \$8.31 annually for an average residential customer using 780 therms.

Table 1. Estimated Bill Impacts for Average Residential Customer

2023 Average Annual Usage (Therms)	2025 Proposed CCRA Surcharge Rate	Average Annual Bill Impact	Total Average Annual Bill (Excluding Gas Costs)	Average Annual Bill Impact of the CCRA Surcharge as a % of Total Bill (Excluding Gas Costs)
780	\$0.01221	\$9.52	\$401.90	2.37%

2023 Average Annual Usage (Therms)	Currently Approved 2024 CCRA Surcharge Rate	Average Annual Bill Impact	Total Average Annual Bill (Excluding Gas Costs)	Average Annual Bill Impact of the CCRA Surcharge as a % of Total Bill (Excluding Gas Costs)
780	\$0.00155	\$1.21	\$393.59	0.31%

Second, the Department requested that MERC provide an updated 2025 December forecasted ending balance incorporating the proposed CCRA rate. Attachment A to these Reply Comments provides the requested CCRA calculation workpaper reflecting the updated 2025

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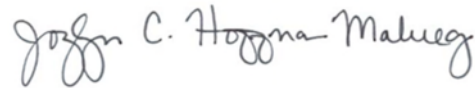
December forecasted ending balance incorporating the proposed CCRA rate of \$0.01221 effective January 1, 2025.

Lastly, MERC agrees to the Department's request to provide the CIP tracker in an Excel spreadsheet in future years.

Based on the foregoing, MERC respectfully requests that the Commission approve its 2023 DSM financial incentive, 2023 CIP tracker account activity, and revised CCRA rate of \$0.01221 per therm, consistent with the Department's recommendations.

Please contact me at (414) 221-4208 if you have any questions regarding this filing.

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
Project Specialist 3
Minnesota Energy Resources Corporation

Enclosure
cc: Service Lists

MERC
CCRA Calculation
**** REVISED to Incorporate the Proposed 2025 CCRA Surcharge ****
To Be Effective January 1, 2025

Forecasted beginning balance (January 1, 2025)	\$ (519,021)
Forecasted Expenditures (January 2025-December 2025)	\$ 15,394,988
2023 Incentive (to be approved in 2024)	\$ 1,494,587
Forecasted 2024 Incentive (based on current approved 2024)	\$ 1,216,044
Less forecasted CCRC & CCRA recovery (January 2025-December 2025)	\$ 17,592,876
Projected carrying charges for 2025	\$ 4,937
Forecasted December 2025 Balance	\$ (1,341)
Forecasted gas sales (January 2025-December 2025) Therms	428,050,511
	\$ -

** Note that incorporating the proposed CCRA rate of \$0.01221, effective January 1, 2025, into the CCRA calculation should equate a \$0 Forecasted December 2025 Balance. The (\$1,341) Forecasted December 2025 Balance shown is attributable to rounding.

In the Matter of the Petition of Minnesota
Energy Resources Corporation for Approval
of the 2023 Conservation Improvement
Program/Energy Conservation and
Optimization Tracker Account, Demand-Side
Management Financial Incentive, and
Conservation Cost Recovery Adjustment
Factor

Docket No. G011/M-24-46

CERTIFICATE OF SERVICE

I, Kristin M. Stastny, hereby certify that on the 19th day of August, 2024, 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. Said documents were also served via U.S. mail and electronic service as designated on the attached service lists.

Dated this 19th day of August, 2024.

/s/ Kristin M. Stastny
Kristin M. Stastny

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company	PO Box 351 200 1st St SE Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_24-46_M-24-46
Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_24-46_M-24-46
William	Black	bblack@mmua.org	MMUA	Suite 200 3131 Fernbrook Lane North Plymouth, MN 55447	Electronic Service	No	OFF_SL_24-46_M-24-46
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	60 S 6th St Ste 1500 Minneapolis, MN 55402-4400	Electronic Service	No	OFF_SL_24-46_M-24-46
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_24-46_M-24-46
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-46_M-24-46
George	Crocker	gwillc@nawo.org	North American Water Office	5093 Keats Avenue Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_24-46_M-24-46
Patrick	Deal	pdeal@mnchamber.com	Minnesota Chamber of Commerce	400 Robert St N Ste 1500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_24-46_M-24-46
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400 Plymouth, MN 554475142	Electronic Service	No	OFF_SL_24-46_M-24-46
Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.	7701 France Ave S Ste 600 Edina, MN 55435	Electronic Service	No	OFF_SL_24-46_M-24-46

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Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_24-46_M-24-46
Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_24-46_M-24-46
Jeffrey	Haase	jhaase@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_24-46_M-24-46
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Martin	Lepak	Martin.Lepak@aeoa.org	Arrowhead Economic Opportunity	702 S 3rd Ave Virginia, MN 55792	Electronic Service	No	OFF_SL_24-46_M-24-46
Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission	1902 6th Ave E Hibbing, MN 55746	Electronic Service	No	OFF_SL_24-46_M-24-46

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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_24-46_M-24-46

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Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.	7701 France Ave S Ste 600 Edina, MN 55435	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

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Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Jeffrey	Haase	jhaase@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S Virginia, MN 55792	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas	N/A	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Tina	Koecher	tkoecher@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Martin	Lepak	Martin.Lepak@aeoa.org	Arrowhead Economic Opportunity	702 S 3rd Ave Virginia, MN 55792	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission	1902 6th Ave E Hibbing, MN 55746	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company	4902 N Biltmore Ln PO Box 77007 Madison, WI 537071007	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

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Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Audrey	Partridge	apartridge@mncee.org	Center for Energy and Environment	212 3rd Ave. N. Suite 560 Minneapolis, MN 55401	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Bill	Poppert	info@technologycos.com	Technology North	2433 Highwood Ave St. Paul, MN 55119	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024-9583	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative	1717 E Interstate Ave Bismarck, ND 58501	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST

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Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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