

July 14, 2014

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G004/M-14-358

Dear Dr. Haar:

Attached are the *Comments* of the Minnesota Department of Commerce, Division of Energy Resources (Department), in the following matter:

Great Plains Natural Gas Co.'s, A Division of MDU Resources Group, Inc. (Great Plains or the Company), Request for Approval of its Proposed 2013 Conservation Improvement Program Tracker Account, Including a Proposed Conservation Cost Recovery Adjustment (CCRA) and a Proposed Demand Side Management (DSM) Financial Incentive for 2013 (*Petition*).

The *Petition* was filed on April 30, 2014 by:

Tamie A. Aberle
Director of Regulatory Affairs
Great Plains Natural Gas Co.,
A Division of MDU Resources Group, Inc.
400 North Fourth Street
Bismarck, North Dakota 58501

As discussed in the attached *Comments*, the Department recommends that the Minnesota Public Utilities Commission (Commission) **approve** Great Plains' *Petition* and **discontinue** allowing the recovery of carrying charges for under or over recovered balances in Great Plains' CIP tracker account. The Department is available to answer any questions that the Commission may have in this matter.

Sincerely,

/s/ MICHAEL ZAJICEK
Rates Analyst

MNZ/lt
Attachment



BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE MINNESOTA DEPARTMENT OF COMMERCE DIVISION OF ENERGY RESOURCES

DOCKET No. G004/M-14-358

I. SUMMARY OF THE UTILITY'S PROPOSAL

On April 30, 2014, Great Plains Natural Gas Co., a Division of MDU Resources Group, Inc. (Great Plains or the Company), submitted a filing with the Minnesota Public Utilities Commission (Commission) containing the Company's 2013 Conservation Improvement Program (CIP) Status Report for the period of January 1, 2013 through December 31, 2013, its 2013 CIP Tracker filing, and its Demand Side Management (DSM) Incentive for the period of January 1, 2013 through December 31, 2013 (*Petition*). In its *Petition*, Great Plains included:

- a proposed DSM financial incentive of \$24,137 for 2013;
- a report of proposed recoveries and expenditures in its CIP tracker account during 2013; and
- a proposed decrease in its currently approved Conservation Cost Recovery Adjustment (CCRA).

The Minnesota Department of Commerce, Division of Energy Resources (Department or DOC) provides its analysis and recommendations below.

II. THE DEPARTMENT'S ANALYSIS

The Department's analysis of Great Plains' *Petition* is provided below in the following sections:

- in Section II.A, Great Plains' proposed 2013 DSM financial incentive;
- in Section II.B, Great Plains' proposed 2013 CIP tracker account;
- in Section II.C, Great Plains' proposed CCRA;
- in Section II.D, a review of Great Plains' DSM and CIP activities for the period 2009 through 2013;
- in Section II.E, a recommendation to standardize CCRA effective dates.

A. *GREAT PLAINS' PROPOSED 2013 DSM FINANCIAL INCENTIVE*

1. *Background and Summary of Great Plains' Proposed 2013 DSM Financial Incentive*

Under the revised shared savings DSM financial incentive plan approved by the Commission,¹ Great Plains may request Commission approval of a performance bonus based on the percent of net benefits that the Company achieves under its approved gas CIP. The plan links the incentive to the Company's performance in achieving cost effective conservation.

With respect to net benefits, Great Plains provided in its *Petition* the benefit/cost results of the revenue requirements test associated with the Company's 2013 CIP. According to the Company, this test resulted in \$561,328 of net benefits from CIP activities in 2013.² Great Plains also stated that its CIP activities achieved energy savings in 2013 of 14,969 dekatherms (Dth). Based on the terms and conditions of its approved DSM incentive plan, Great Plains requested approval of a 2013 DSM financial incentive of \$24,137.

2. *The Department's Review of Great Plains' Proposed 2013 Gas DSM Financial Incentive*

The Department's CIP Engineering Staff review of the demand and energy savings that underpin Great Plains' proposed 2013 DSM financial incentive is on-going. In all likelihood, it will not be completed before the fall of 2014. This lag between the Company's request for recovery of the incentive and completion of the Department CIP Engineering Staff review is a recurring phenomenon. In its review of Great Plains' 2012 DSM financial incentive filing,³ the Department compensated for this lag by simply assuming Great Plains' claimed energy savings for 2012 were correct as filed and planned to make, in the instant docket, any adjustments approved by the Deputy Commissioner of the Department. However, the Deputy Commissioner accepted Great Plains' 2013 Status Report without any adjustments⁴ and thus none need to be made in the instant docket.

As was done last year, the Department's analysis assumes that Great Plains' claimed 2013 energy savings are correct as filed. If the Deputy Commissioner of the Department subsequently approves changes to Great Plains' energy savings claims that impact either recovery of CIP budgets or levels of Shared Savings DSM financial incentives, those changes can be incorporated in the Company's 2014 filing that will be made April 30, 2015.

Great Plains' reported gas energy savings level is 14,969 Dth, in the Company's 2013 *Petition*. The Department used the 14,969 Dth energy savings in its review in this docket.

¹ See Docket No. E,G999/CI-08-133.

² See Attachment C of the Company's *Petition*.

³ Docket No. G004/M-13-334

⁴ Docket No. G004/CIP-09-649.03

According to Attachment G of Great Plains' *Petition*, the Company receives approximately 0.016 percent of the net benefits created by its 2013 CIP investments for every 0.1 percent of sales saved above 0.1 percent. Great Plains estimated that it achieved energy savings of 26.6 percent of its non-CIP-exempt retail sales goals. Thus, Great Plains' 2013 DSM financial incentive is 4.29997 percent of the \$561,328 net benefits achieved for an incentive amount of \$24,137. Consequently, the Department recommends approval of an incentive of \$24,137 for Great Plains' 2013 CIP achievements.

3. The DOC's Overall Recommendation Concerning Great Plains' 2013 DSM Financial Incentive

The Department recommends that the Commission approve Great Plains' proposed 2013 DSM financial incentive of \$24,137 to be included in the Company's CIP tracker account no sooner than the issue date of the Commission's *Order* in the present docket.

B. GREAT PLAINS' 2013 CIP TRACKER ACCOUNT

In its *Petition*, Great Plains requested approval of its report on recoveries and expenditures in the Company's CIP tracker account during 2013. Table 1 provides a summary of activity in Great Plains' tracker account during 2013.

Table 1: A Summary of Great Plains' CIP Tracker Account Activity in 2013⁵

Description	Time Period	Amount
Beginning Balance	January 1, 2013	\$369,299
CIP Expenses	January 1 through December 31, 2013	\$531,263
Carrying Charges	January 1 through December 31, 2013	\$27,097
Base Rate Recovery	January 1 through December 31, 2013	(\$146,977)
CCRA Recovery	January 1 through December 31, 2013	(\$383,300)
Ending Balance	December 31, 2013	\$397,382

4. The Department's Overall Recommendations Concerning the 2013 CIP Tracker Account

The Department recommends that the Commission approve the Company's 2013 CIP tracker account, as provided in the Company's *Petition* and summarized in Table 1 above.

C. CONSERVATION COST RECOVERY ADJUSTMENT

Minnesota law states in relevant part that the Commission "may permit a public utility to file rate schedules for annual recovery of the cost of energy conservation improvements."⁶ This annual CIP recovery mechanism is the previously introduced CCRA.

⁵ See Attachment F of the *Petition* for more detailed information concerning the Company's 2013 CIP tracker account.

⁶ See Minn. Stat. §216B.16, subd. 6b(c).

In its *Petition*, Great Plains requested approval of a revised CCRA of \$0.0747 per Dth.⁷ Table 2 below provides a summary of Great Plains' calculation of its proposed CCRA.

Table 2: Summary of Great Plains' Calculation of its Proposed CCRA

Description	Amount
CIP Tracker Account Balance as of December 31, 2013	\$397,382
Actual and Estimated CIP Expenses - January - August 2014	\$414,183
Actual and Estimated Carrying Charges - January - August 2014	\$15,154
Actual and Estimated Recoveries - January - August 2014	(\$468,021)
Estimated CIP Tracker Account Balance as of September 1, 2014	\$358,698
Proposed 2013 DSM Financial Incentive	\$24,137
Total Estimated CIP Tracker Account Balance as of September 1, 2014	\$382,835
Projected Sales less CIP-exempt Sales (Dth) ⁸	5,124,900
Proposed CCRA (\$/Dth)	\$0.0747

Great Plains stated that its CIP-exempt customer's throughput is not included in the projected throughput of 5,124,900 Dth.⁹ Great Plains used the Company's estimated sales (less sales attributable to the CIP-exempt customer) for the period in which the CCRA is proposed to be in effect.

Table 3 below compares the Company's proposed 2014/2015 CCRA of \$0.0747 per Dth in the present docket with the Company's current CCRA of \$0.1023 per Dth, which was approved by the Commission in the Company's 2012 CIP tracker account proceeding.

Table 3: Comparison of Great Plains' Current and Proposed CCRAs for All Customer Classes

Current CCRA (\$/Dth)	Proposed CCRA (\$/Dth)	Change (\$/Dth)	Percent Change
\$0.1023	\$0.0747	(\$0.0276)	(27%)

As indicated in Table 3, Great Plains' proposed 2014/2015 CCRA represents an approximately 27 percent decrease from the Company's current CCRA. A primary reason for the Company's proposed rate decrease is a decrease in the 2013 DSM incentive compared to the 2012 DSM incentive due to a decrease in energy savings in 2013.

The Department recommends that the Commission approve Great Plains' proposed CCRA of \$0.0747 per Dth for all customer classes, as shown in Table 2 above. The Department also recommends that the Commission require the rate to be effective on the first billing cycle in the next full month after Commission approval, conditioned on the Company submitting, within 10 days of the issue date of the *Order* in the present docket, a compliance filing with

⁷ See Attachment F of the Company's *Petition*.

⁸ Projected Dth throughput September 2014 through August 2015 (rather than test year sales) pursuant to Docket No. G004/M-12-439. Excludes CIP-exempt customer Dth throughput.

⁹ See footnote 1 on page 1 of Attachment F of the *Petition*. The customer, Green Plains Otter Tail LLC, had its CIP exemption petition granted by the DOC on December 20, 2012 in Docket No. G004/CIP-12-439.

the relevant tariff sheets and necessary calculations that comply with the Commission’s determinations.

With respect to customer notification, Great Plains proposed to update the relevant tariff sheet with the approved CCRA on the Company’s website upon approval by the Commission. Although this proposal would provide some degree of notification, the Department recommends that a message be included on customers’ bills to provide better notification of the change in the approved CCRA. Specifically, the Department recommends that the Commission require Great Plains to include the following bill message in the billing month immediately following the date of the *Order* in the present docket.

Great Plains recovers the costs changes in its energy conservation programs from the base established in 2007 through a Conservation Cost Recovery Adjustment (CCRA) subject to MN Public Utilities Commission approval. A CCRA of \$0.0747 per dk as shown in the Resource Adjustment above is effective. Learn more about reducing your energy use by visiting our website at www.gpng.com or calling us at 1-877-267-4764.

D. REVIEW OF GREAT PLAINS’ DSM AND CIP ACTIVITIES (2009-2013)

In Table 5 below, the Department presents a historical comparison of Great Plains’ DSM and CIP activities during the period 2009 through 2013. Table 5 provides an indication of how the Company’s DSM financial incentives, carrying charges, year-end tracker balances, reported CIP expenditures, and reported energy savings have changed during that period.

Table 5: History of Great Plains’ DSM and CIP Activities (2009 – 2013)

	2009	2010	2011	2012	2013 ¹⁰
DSM Financial Incentive	\$0	\$18,915	\$37,707	\$114,763	\$24,137
Incentive as % of CIP Expenditures	0%	4.4%	10.2%	28.6%	4.5%
Carrying Charges	\$1,756	(\$7,527)	\$10,979	\$24,008	\$27,097
Carrying Charges as % of CIP Expenditures	0.94%	(1.76%)	2.96%	5.98%	5.1%
Year-End Tracker Balance	(\$47,723)	\$52,659	\$324,636	\$369,299	\$397,382
Year-End Tracker Balance as % of CIP Expenditures	(25.6%)	12.3%	87.6%	91.9%	74.8%
CIP Expenditures	\$186,584	\$427,847	\$370,570	\$401,694	\$531,263
Achieved Energy Savings (Dth)	7,975	17,426	24,604	41,509	14,969
Average Cost per Dth Saved	\$23.40	\$24.55	\$15.06	\$9.68	\$35.49

¹⁰ The DSM financial incentive, carrying charges, CIP expenditures, and year-end tracker balance for 2013 reflect Great Plains’ proposals. See Section II.A and Section II.B above.

As indicated in Table 5, Great Plains' 2013:

- proposed DSM Financial Incentive is approximately one-fifth the size of the Company's 2012 incentive;
- carrying charges are higher than in 2012;
- year-end tracker balance is higher than in 2012;
- CIP expenditures are approximately 1.3 times higher than its 2012 expenditures; and
- Average cost per Dth saved is much higher than in previous years.

The Department notes that Great Plains' 2013 CIP expenditures reflect the inclusion of the incentives for both 2011 and 2012.

In the past few years the Department has been working with utilities and the Commission to minimize carrying charges. As can be seen in Table 5 Great Plains' carry charges have been growing over the last few years to a current high of \$27,097 in 2013. As a percent of total CIP expenses, Great Plains' carrying charges have increased in recent years and can be costly to customers.

The Department notes that carrying charges were first approved as part of Minnesota utilities' CIP tracker accounting in the early 1990s. One of the purposes of carrying charges, and allowing timely recovery through a CIP tracker account, was to provide utilities an incentive to invest in energy conservation by ensuring that they not only recovered all conservation costs incurred in a timely manner, but that they also received a carrying charge on uncollected balances. At that time financial incentives for conservation were de minimis.

Now, however, the Commission provides large financial incentives for utility investments in CIP (Great Plains' DSM financial incentives totaled \$171,385 for 2010-2012). Rather than continue to calculate carrying charges on positive or negative monthly tracker account balances, the Department recommends that the Commission eliminate carrying charges. The Department concludes that it is reasonable to disallow carrying charges beginning in the month after the Commission issues its Order in this Docket.

In the event that the Commission decides not to discontinue Great Plains' CIP carrying charges, then the Department recommends that the Commission disallow carrying charges on Great Plains' financial incentive. The Minnesota Chamber of Commerce (the Chamber) made this recommendation for Otter Tail Power Company in the Chamber's May 30, 2014 Comments (see Docket No. E017/M-14-201). The Chamber argued that carrying costs should not be charged "since the utility is not incurring any risk in receiving the incentive nor are dollars being held up to pay for the CIP expenditures." The Department agrees with the Chamber that paying carrying costs on CIP financial incentives is not needed and recommends that Great Plains remove its incentive when calculating carrying charges. The Department anticipates that removing Great Plains' DSM financial incentive may reduce carrying charges to such an extent as to virtually eliminate carrying charges.

The Department recommends that the Commission eliminate carrying charges on under- or over-recovered CIP balances. In the event that the Commission decides not to eliminate carrying charges on the entire CIP balance, the Department recommends that the Commission not allow carrying charges on Great Plains' CIP financial incentive.

E. STANDARDIZING INCENTIVE FILINGS

In an attempt to standardize DSM financial incentive and CCRA filings the Department is recommending in other filings that:

1. utilities should record any DSM financial incentives awarded during the calendar year of the tracker filing in question;
2. based on experience from previous CCRA filings, utilities should calculate their proposed CCRA rate assuming that the rate will be implemented in November or later of the filing year; and
3. utilities should include its next estimated DSM financial incentive in the CCRA calculation to minimize fluctuations in the tracker account balance when the next incentive is awarded;¹¹ and
4. utilities should use the projected therm sales for the period the proposed CCRA will be effective, not the projected sales for the calendar year.

Great Plains has requested a CCRA start date of September in this filing, which has not always been possible due to the timing of the CCRA approvals. Thus requiring Great Plains to estimate its new CCRA rate based on a November implementation date may result in a more accurate CCRA. Great Plains has been consistent in recording any DSM financial incentives awarded during the calendar year, in including their estimated DSM financial incentive in the CCRA calculation, and in using projected sales for the period the proposed CCRA will be effective. Therefore, these recommendations are listed here for standardization purposes and are not a request for the Company to change its methods.

III. THE DEPARTMENT'S RECOMMENDATIONS

The Department recommends that the Commission:

- 1) approve Great Plains' proposed 2013 DSM financial incentive of \$24,137 to be included in the Company's CIP tracker account no sooner than the issue date of the Commission's *Order* in the present docket;
- 2) approve the Company's 2013 CIP tracker account, as provided in the Company's *Petition* and summarized in Table 1 above;

¹¹ This concern would be mitigated should the Commission decide to eliminate carrying charges completely or eliminate the application of carrying charges on the financial incentives.

- 3) approve Great Plains' proposed CCRA of \$0.0747 per Dth for all customer classes and require that the CCRA approved by the Commission be effective in the billing month immediately following the issue date of the *Order* in the present docket, conditioned on the Company submitting, within 10 days of the *Order*, a compliance filing with the relevant tariff sheets and necessary calculations that comply with the Commission's determinations;
- 4) discontinue approving carrying charges for under or over recovered balances in Great Plains' CIP tracker account beginning in the month after the Commission issues its *Order* in this Docket;
- 5) in the event that the Commission continues to allow the application of carrying charges to the over and under recovery of CIP tracker accounts, disallow application of the carrying charge to the Company's financial incentive; and
- 6) require Great Plains to include the following bill message in the billing month immediately following the date of the *Order* in the present docket:

Great Plains recovers the cost changes in its energy conservation programs from the base established in 2007 in Minnesota through a Conservation Cost Recovery Adjustment (CCRA) subject to MN Public Utilities Commission approval. A CCRA of \$0.0747 per dk as shown in the Resource Adjustment above is effective. Learn more about reducing your energy use by visiting our website at www.gpng.com or calling us at 1-877-267-4764.

/lt

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
Comments**

Docket No. G004/M-14-358

Dated this 14th day of July 2014

/s/Sharon Ferguson

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Gary	Olson		Product Recovery, Inc.	2605 E Cliff Rd Burnsville, MN 55337	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Kim	Pederson	kpederson@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Audrey	Peer	audrey.peer@centerpointenergy.com	CenterPoint Energy	800 Lasalle Avenue - 14th Floor Minneapolis, Minnesota 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Lisa	Pickard	lpickard@minnkota.com	Minnkota Power Cooperative	1822 Mill Rd PO Box 13200 Grand Forks, ND 582083200	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Bill	Poppert		Technology North	2433 Highwood Ave St. Paul, MN 55119	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Cindy	Schweitzer Rott	cindy.schweitzer@clearesult.com	CLEARResult's	S12637A Merrilee Rd. Spring Green, WI 53588	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Tom	Smilanich		Passive Concepts	228 6th Ave N South St. Paul, MN 55075	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

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John	Steinhoff		Resource Solutions, Inc.	318 Kensington Drive Madison, WI 53704	Paper Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST