



Minnesota Energy Resources Corporation
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July 12, 2021

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 2020 Conservation Improvement Program Tracker Account, Demand-Side Management Financial Incentive, and Conservation Cost Recovery Adjustment Factor
Docket No. G011/M-21-307**

Reply Comments of Minnesota Energy Resources Corporation

Dear Mr. Seuffert:

On June 30, 2021, the Minnesota Department of Commerce, Division of Energy Resources (the "Department") filed Comments in the above-referenced docket requesting that Minnesota Energy Resources Corporation ("MERC" or the "Company") submit reply comments addressing a discrepancy between the forecasted December 2022 balance of \$207,703 listed on pages 9 and 10 of the Company's petition and a forecasted balance of \$208,227 in Attachment C, used to calculate the proposed conservation cost recovery adjustment ("CCRA") rate to be implemented January 1, 2022.

Pending resolution of the identified discrepancy, the Department recommends that the Commission:

1. Approve MERC's 2020 DSM financial incentive of \$1,345,674 to be included in the Company's CIP tracker account no sooner than the issue date of the Commission's Order in the instant docket;
2. Approve MERC's 2020 CIP tracker account activities as summarized in Table 1 of the Department's Comments;
3. Approve the revised gas CCRA of \$0.00046 per therm for all of MERC's Minnesota customer classes, to be effective no sooner than the issue date of the Commission's Order in the instant docket. The approval is conditioned upon the Company submitting a compliance filing with the relevant tariff sheets and necessary calculations that comply with the Commission's determinations within 10 days of the issue date of the Order; and
4. Require MERC to include the following bill message (with the appropriate date) following the date of the Order in the instant docket:

Effective January 1, 2022, the CCRA (conservation cost recovery adjustment) has been revised to \$0.00046 per therm. The CCRA is an annual adjustment to true-up under-recovery or over-recovery of CIP (conservation improvement program) expenses.

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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 discrepancy identified by the Department with respect to the December 2022 forecasted CIP tracker balance.

The \$208,227 forecasted December 2022 tracker balance reflected in Table 2 of the Department's Comments and Attachment C of the Company's Petition, is the correct forecasted balance. Therefore, the calculated CCRA rate of \$0.00046 per therm as shown in Attachment C is also correct.

The \$207,703 referenced in MERC's Petition at pages 9 and 10 was based on a previous calculation of the Company's 2020 CIP incentive, which was subsequently revised to account for corrections to the Company's net benefits calculation. MERC inadvertently failed to update the narrative Petition to reflect the resulting corrected December 2022 forecasted tracker balance of \$208,227. The three adjustments to the net benefits calculation were (1) to exclude net benefits from the low-income sector in accordance with Minn. Stat. §216B.241, subd. 7; (2) to remove Next Generation Energy Act ("NGEA") assessments from CIP expenditures, and (3) to calculate benefits for Home Energy Reports using the full measured savings with a one-year lifetime in accordance with the Department's average savings method guidance. Again, MERC confirms that Attachments B (BENCOST model and 2020 Incentive) and C (CCRA calculation) reflect correct inputs and calculations. The Company apologizes for the discrepancy in the numbers reported in its Petition.

Based on the foregoing, MERC respectfully requests that the Commission approve its 2020 DSM financial incentive, 2020 CIP tracker account activity, and revised CCRA rate of \$0.00046 per therm, consistent with the Department's recommendations.

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

Sincerely,



Joylyn C. Hoffman Malueg
Project Specialist 3
Minnesota Energy Resources Corporation

cc: Service Lists

In the Matter of the Petition of Minnesota
Energy Resources Corporation for
Approval of 2020 Conservation
Improvement Program Tracker Account,
Demand-Side Management Financial
Incentive, and Conservation Cost
Recovery Adjustment Factor

Docket No. G011/M-21-307

CERTIFICATE OF SERVICE

I, Kristin M. Stastny, hereby certify that on the 12th day of July, 2021, 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 12th day of July, 2021.

/s/ Kristin M. Stastny
Kristin M. Stastny

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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_21-307_M-21-307
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