

December 2, 2024

PUBLIC DOCUMENT

Will Seuffert
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **PUBLIC** Comments of the Minnesota Department of Commerce
Docket Nos. G999/CI-21-135 and G011/CI-21-611

Dear Mr. Seuffert:

Attached are the **PUBLIC** comments of the Minnesota Department of Commerce (Department) in the following matter:

In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers

In the Matter of a Petition Minnesota Energy Resource Corporation to Recover February 2021 Natural Gas Market Costs

The annual compliance filing for 2024 was filed by Minnesota Energy Resources Corporation (MERC) on August 1, 2024.

The Department recommends the Minnesota Public Utilities Commission **accept and approve** MERC's 2024 Annual Compliance Filing and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Peter Wyckoff, Ph.D.
Deputy Commissioner, Division of Energy Resources

JK/ar
Attachment



Before the Minnesota Public Utilities Commission

PUBLIC Comments of the Minnesota Department of Commerce

Docket Nos. G999/CI-21-135 and G011/M-21-611

I. INTRODUCTION

The Minnesota Department of Commerce, Energy Division (Department) appreciates the opportunity to provide comments on Minnesota Energy Resources Corporation's (MERC, the Company) annual compliance filing submitted August 1, 2024, for these two dockets. These two dockets can be thought of as two aspects of the Commission's response to the costs associated with the February 2021 Pricing Event (PE). Docket no. G011/CI-21-611 focused primarily on the recovery of the costs resulting from the February 2021 Pricing Event. Docket no. G999/CI-21-135 was more concerned with MERC's efforts to improve its ability to mitigate the risk of price spikes on a forward-looking basis.¹

MERC's 2024 Annual Compliance Filing (ACF) introduced a new twist compared to the Company's 2023 ACF. Natural gas wholesale prices spiked across Minnesota and the Upper Midwest on January 13th through the 16th 2024 (January 2024 Pricing Event). This event triggered a reporting requirement that was included in the Commission's February 17th, 2023, Order related to rapid price increases.²

The Company estimated its weighted average cost of gas (WACOG) for its Consolidated (CON) system to be \$2.582/Dth in its January 2024 Purchase Gas Adjustment (PGA) filing.³ MERC paid \$16.215/Dth for 3,000 Dth/day at Emerson for daily gas during the January 2024 pricing event and \$16.295/Dth for daily gas at the Centra-Spruce location between January 13th and 16th.⁴ The average cost of gas for those two transactions was \$16.240/Dth and was 6.3 times higher than the Company's monthly PGA estimate.

¹ The Commission requirement for annual compliance filings for these two dockets was included in its ORDER REQUIRING ACTIONS TO MITIGATE IMPACTS FROM FUTURE NATURAL GAS PRICES SPIKE, SETTING FILING REQUIREMENTS AND INITIATING A PROCEEDING TO ESTABLISH GAS RESOURCE PLANNING REQUIREMENTS, issued February 17, 2023, at Order pt. 15 (February 17th Order).

² Ibid at Order Pt. 3. If a gas utility in this docket pays prices on the daily spot market that exceed five times the average price of gas in the utility's filed purchased-gas adjustment for the current month when the gas was purchased, the utility shall make a filing to the Commission within 14 days identifying: A. Its costs for procuring gas for Minnesota customers while gas prices were inflated above this amount, B. What actions the utility took to account for or mitigate those costs, and C. Justifications for why its actions were prudent.

³ MERC's service area is divided into two systems, the Northern Natural Gas (NNG) system and the Consolidated system (CON). The NNG system serves customers in southern and central Minnesota. The CON system serves customers in northern Minnesota.

⁴ Compliance filing, January 26, 2024, at p 2.

MERC made that filing on January 26, 2024. Perhaps the most interesting aspect of MERC's January 2024 Compliance filing was the statement "there were no daily purchases on the MERC NNG system".⁵ The Department will review this development in a later section.

The Commission identified several reporting requirements to be included in each utility's annual compliance filings. For clarity, the Department separated those reporting requirements into two timeframes, short-term (up to 5 years) and long-term (beyond 5 years). The Department then further divided those reporting requirements into those related to the supply and those related to the demand of natural gas respectively for the different time periods.

The short-term supply related reporting requirements are primarily focused on the review of operational changes to the gas supply function that could provide ratepayers with better protection against short-term price spikes.⁶ The topics included are: 1) Availability and cost of contracting, hedging, and supply options to mitigate the risk of short-term price spikes; 2) Utilization of baseload purchases; 3) Optimization of Company-owned and third-party storage facilities; 4) Optimization of peak shaving facilities; 5) Potential for improvement of interstate pipeline supplier diversity; and 6) A monthly forecast of the upcoming winter heating season which includes demand minimum, average and maximum load requirements and the Company's planned mix of baseload, spot supply and storage by day.⁷ The short-term demand-related reporting requirements include: 1) Development of interruptible tariffs that contain an economic curtailment provision; and 2) Research and development concerning voluntary conservation efforts directed at the general public.⁸

The Commission didn't identify any long-term supply or demand reporting requirements. Rather, the Commission initiated a Gas Integrated Resource Plan (IRP) process that combined long term supply and demand issues.⁹

Regarding the questions included in the Commission's Notice of Comment in this proceeding, they include the following:

- Does the natural gas utilities annual compliance filings comply with the Commission's Orders?
- Should the compliance filings be accepted and approved?
- Should the Commission make any changes to future compliance filing requirements?
- Are there other issues or concerns related to this matter?

⁵ January 2024 Compliance filing filed January 26, 2024, at p. 2.

⁶ Ibid at Order Pts. 5, 6, 7, 11, 12, and 14.

⁷ Topics 5 and 6 are to be filed in a company's demand entitlement and annual hedging filings respectively.

⁸ Ibid at Order Pt. 2 and 11.

⁹ Ibid at Order Pt. 16.

II. PROCEDURAL BACKGROUND¹⁰

February 12 through 22, 2021	A combination of significant disruptions in natural gas supply combined with a sharp rise in natural gas demand, led to an extraordinary increase in natural gas spot market prices in Minnesota. The effects of the price spike were amplified by the closure of the wholesale natural gas markets for the three-day Presidents Day holiday weekend (February 2021 Pricing Event).
February 23, 2021	The Commission held a Planning Meeting regarding the recent pricing event (PE) and authorized an investigation in Docket No. G008/CI-21-135.
March 2, 2021	The Commission issued an Order Opening Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers in Docket No. G999/CI-21-135.
March 10, 2021	The Commission issued a request for initial filings and notice of comments period with an initial date of April 9, 2021, in Docket No. G999/M-21-135.
March 22 through July 19, 2021	The Commission solicited comments from affected utilities and interested parties on the procedural, cost-recovery and policy issues identified in the wake of the February 2021 PE.
August 30, 2021	The Commission issued its ORDER GRANTING VARIANCES AND AUTHORIZING MODIFIED COST RECOVERY SUBJECT TO PRUDENCE REVIEW, AND NOTICE OF AND ORDER FOR HEARING. This Order created Docket No. G011/CI-21-611.
September 20, 2021, through May 24, 2022	The Office of Administrative Hearings (OAH) held a contested case hearing on the issue and provided its report on findings of fact, conclusions of law and recommendation.
October 19, 2022	The Commission issued its ORDER DISALLOWING CERTAIN NATURAL GAS COSTS AND REQUIRING FURTHER ACTION.
February 17, 2023	The Commission issued its ORDER REQUIRING ACTIONS TO MITIGATE IMPACTS FROM FUTURE NATURAL GAS PRICE SPIKES, SETTING FILING REQUIREMENTS, AND INITIATING A PROCEEDING TO ESTABLISH GAS RESOURCE PLANNING REQUIREMENTS.
August 1, 2023, through July 30, 2024	MERC filed its 2023 ACF. The Department provided comments on that filing. The Commission issued an order accepting and approving the Company's 2023 Annual Compliance Filing.

¹⁰ Attachment 1 provides a more detailed procedural background for this proceeding. The Department truncated this section of its comments for editorial purposes. This proceeding has been active for three and a half years and included a contested case hearing with four utilities and numerous interested parties participating. A complete table delineating the procedural background would take several pages.

January 26, 2024	MERC submitted a compliance filing on the cost impacts due to extreme market conditions.
August 2024	MERC filed its 2024 ACF. The Commission issued a notice of comment period for MERC's 2024 Annual Compliance Filing.

III. DEPARTMENT ANALYSIS

The Department's analysis begins with its responses to the Commission's questions included in its Notice of Comment (NOC) in this proceeding dated August 29, 2024. Next, the Department summarizes MERC's Initial Comments (IC) filing. This filing discussed the Company's plans for modifying its internal processes to mitigate the risk of short-term price spikes. That filing and those made by the other affected gas utilities along with the filings and comments from the various parties in the proceeding formed the basis for the Commission's reporting requirements required in MERC's annual compliance filing.¹¹

Next, the Department reconciles the information in the Company's 2024 ACF with the ACF reporting requirements included in the Commission February 17, 2023, Order. The Department summarizes an analysis MERC completed that attempted to estimate the value of MERC's efforts to mitigate the short-term price spike resulting from the January 2024 PE relative to the Company's efforts during the February 2021 PE.

A. RESPONSES TO COMMISSION'S QUESTIONS

The Department provides its responses to the Commission's questions follow in the order presented in the NOC.

A.1. Does the natural gas utilities annual compliance filings comply with the Commission's Orders?

The Department concludes that MERC's 2024 Annual Compliance Filing complies with the Commission's Orders related to this proceeding.

A.2. Should the compliance filings be accepted and approved?

The Department recommends the Commission accept and approve MERC's 2024 ACF.

A.3. Should the Commission make any changes to future compliance filing requirements?

The Department did not identify any changes that it recommends the Commission implement regarding future compliance filing requirements.

¹¹ MERC's IC was filed on September 15, 2022, in this proceeding.

A.4. Are there other issues or concerns related to this matter?

The Department did not identify any issues or concerns at this time.

B. SUMMARY OF XCEL'S GAS PRACTICES COMMENTS

During its review of the prudence of the four utilities seeking the recovery of extraordinary gas costs in August 2022, the Commission required the gas utilities to file a plan that addressed the question of how those same utilities were modifying their practices to protect ratepayers from future extraordinary gas prices spikes.¹²

MERC listed six supply-side and three demand-related modifications it had implemented since the February 2021 PE.¹³

B.1. Modifications Implemented since the February 2021 PE

The supply-related changes included:

- 1) Gas contracting – the Company issued a Request for Proposals (RFP) for call options priced at the First of Month index rather than daily pricing. MERC noted this product would provide it with the ability to call on gas supplies when needed without the having exposure to the daily market prices. Unfortunately, the Company didn't receive any cost-effective bids for the requested product.
- 2) Gas Purchasing – MERC has added baseload supply priced at FOM index and decreased planned daily purchases thereby reducing its exposure to the daily market.
- 3) Storage – the Company increased its ANR storage by 5,000 Dth/day and continues searching for other potential storage options.
- 4) Hedging – MERC continues to use financial futures and call options, while simultaneously researching new products or services that could help mitigate hedge price risk.
- 5) Transportation tariff modifications – tailoring the Company's imbalance penalties such that they are consistent with the imbalance penalties included in the interstate pipelines' tariffs.
- 6) Market reform - advocating for changes to the North American Energy Standards Board (NAESB) standard contract for gas purchasing;

¹² See Commission Notice of Comments issued August 23, 2022, in Docket Nos. G999/CI-21-135, G008/M-21-138, G004/M-21-235, G002/CI-21-610 and G011/CI-21-611.

¹³ MERC IC at p. 2-5

The demand-related changes included:

- 1) A continuation of the Communication Plan it filed on November 1, 2021, in this proceeding.¹⁴
- 2) An economic curtailment proposal the Company formulated with the three other rate-regulated gas utilities.¹⁵
- 3) Improvements to its daily forecasting protocols for transportation customers, in part by reclassifying its largest electric generation customer.

These modified practices then formed the basis for the ACF reporting requirements.

B.2. Natural Gas IRP

The Company discussed Gas IRP in some detail. Given the amount of attention the Commission has given this process over the year or two, the Department doesn't see much value in summarizing MERC's discussion of this topic in this proceeding.

C. UPDATE ON MERC'S EFFORTS TO MITIGATE THE RISK OF SHORT-TERM NATURAL GAS PRICE SPIKES

The Department reconciles the Commission's ACF reporting requirements with the information the Company included in its 2024 ACF filed August 1, 2024. The Department then reviews the Company's performance during the January 2024 Pricing Event to determine if MERC's modifications to lower ratepayers' risk from short-term price spikes has been successful.

C.1. Gas Contracting

Consistent with the discussion in its Initial Comments, MERC noted that it had continued to pursue the use of call options priced at the first-of-month (FOM) index, not daily pricing. This financial instrument provides the Company with the flexibility to call on gas supplies when needed, minimizing the exposure to the volatility of the daily market. MERC noted that it had had some success in negotiating what it called "Supply Call Options" for the 2024-2025 heating season.

The Department asked in IR #85 how the Company modified its gas supply processes to be able to avoid purchasing any daily natural gas on NNG during the January 2024 Pricing Event.¹⁶ The Company responded:

For the 2023-2024 winter heating season, MERC issued several requests for proposals (RFPs) as part of an Asset Management Agreement (AMA) that includes capacity releases as well as call options that have traditionally been based on daily prices but were requested to be based on first-of-

¹⁴ *Ibid* at p. 6. The Company noted the difficulties associated with voluntary conservation efforts during price spikes.

¹⁵ *Ibid* at p. 5 – 6.

¹⁶ Attachment 2 includes Department IR #85 and the Company's response.

month pricing. Despite there being minimal interest by counterparties to offer FOM calls in past years, MERC was able to execute an agreement that includes FOM call supply at several different Northern Border Pipeline and Northern Natural Gas interconnects. The other RFP was at a different supply basin (NNG Ventura) which resulted in no suppliers submitting responses.

In this instance, MERC managed to mitigate the risk of short-term price spikes on NNG cost-effectively. That result is one the Department would like to see generalized to all Minnesota's gas utilities.

Unfortunately, it is the Department's impression that the Company's ability to secure these FOM call options was due to the decentralized nature of the wholesale natural gas market and system and perhaps some contract anomalies. Hence, the Department doesn't believe that MERC's approach can be generalized and used by other gas utilities serving Minnesota. The lack of responses to the Company's RFP for the same product for the NNG-Ventura supply basis appears to support this conclusion.

As noted earlier, MERC has similar agreements in place for the current heating season (2024-2025) so its ratepayers served by NNG will continue to have that protection from short-term price spikes for another heating season.

C.1.1. Geographic Diversity of Supply

The Department asked about this topic in Department IR #78 requesting a narrative that discussed the Company efforts since the February 2021 PE.¹⁷ MERC responded:

MERC ensures that it procures its gas supply at the locations that are identified as the primary receipt location on their transportation service agreements (aka capacity). This is to maximize the reliability of gas deliveries, as using capacity at a location other than the contractual primary locations will likely result in some gas not being delivered. The other opportunity that would allow for more geographic diversity is for when new pipeline capacity purchases are made. Since 2021, MERC has made several capacity purchases to meet its peak day requirements.

MERC then listed transportation service agreements in its response.

¹⁷ Attachment 3 includes Department IR #78 as well as the Company's response.

C.1.2. Pipeline Transportation Capacity

The Department in IR #82 asked about the Company's efforts to use transportation capacity on interstate or in-state pipelines to mitigate the risk of short-term price spikes during the winter heating season.¹⁸ The Company explained:

There have not been any meaningful options to utilize the Company's transportation capacity on the interstate pipelines differently to mitigate the risk of short-term price spikes. Further, the pipelines have not offered any service changes that could allow for the transportation capacity to be used any differently to mitigate the risk of short-term prices.

The Department included this discussion to highlight the minimal actions the interstate pipelines have offered to help their customers mitigate the risk of short-term price spikes.

C.2. Gas Purchasing

Department IR #79 asked for the Company's annual winter supply plans by PGA area beginning in the 2020-2021 through the 2024-2025 heating seasons.

Charts 1 through 3 (following pages) summarize MERC's winter heating season procurement strategies for 2020-2021 through 2024-2025 in percentage terms for daily, monthly and storage gas supplies. Chart 1 provides the information for the Company's NNG PGA area. Chart 2 provides the same information for MERC's Consolidated PGA area. Chart 3 provides a total Company perspective.

MERC purchased a little over 25% of its winter needs via daily gas supply for the 2020-2021 heating season. After the February 2021 PE, the Company began to lower that percentage to lessen its exposure to price spikes in the daily market. For the 2024-2025, MERC forecasted it would only purchase around 10% of its winter heating season needs via daily contracts. The percentage of the winter heating season requirements purchased by way of monthly contracts increased during this same period from 34% to 51% for the same reasons the percentage of the daily contracts sourced declined. The percentage of the winter heating season needs supplied by storage remained constant, declining from 40% to 39%. The difficulty of securing new storage facilities likely contributed to this result.

¹⁸ Attachment 4 includes Department IR #82 as well as the Company's response.

Chart 1 - Comparison of Forecasted Purchases for 2020-2021 through 2024-2025 Winter Heating Seasons for its NNG System¹⁹

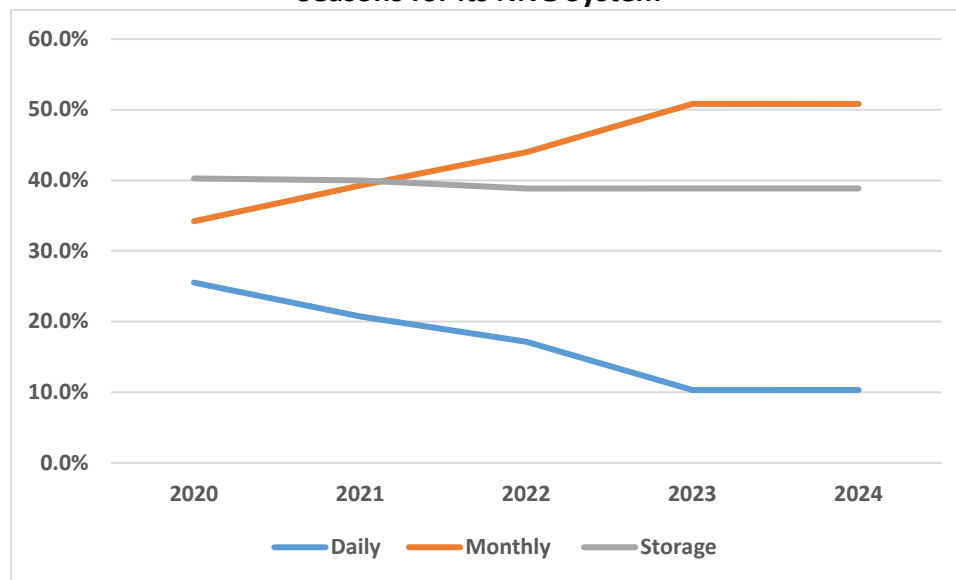


Chart 2 (following page) compares 2020-2021 through 2024-2025 winter heating season plans for MERC's Consolidated PGA area.

Chart 2 demonstrates a similar pattern to Chart 1. MERC planned to purchase 32% of its winter heating season supply via the daily market during the 2020-2021 heating season. That percentage has declined each year since then. For the upcoming 2024-2025 season, the Company planned to purchase approximately 14% of its needs for the CON system using daily contracts. The percentage of monthly contracts increased from a little more than 32% in 2020-2021 to almost 52% for the upcoming heating season (2024-2025). Storage increased from around 26% during the 2020-2021 season to almost 35% for the upcoming 2024-2025 heating season. MERC was able to secure additional storage for this portion of its service area through a contract for 5,000 Dth of incremental storage delivery from ANR-S.²⁰

¹⁹ Attachment 5 includes Department IR #79 as well as the Company's response.

²⁰ Initial Comments filed September 15, 2022, at p. 4.

Chart 2 - Comparison of Forecasted Purchases for 2020-2021 through 2024-2025 Winter Heating Seasons for its Consolidated System²¹

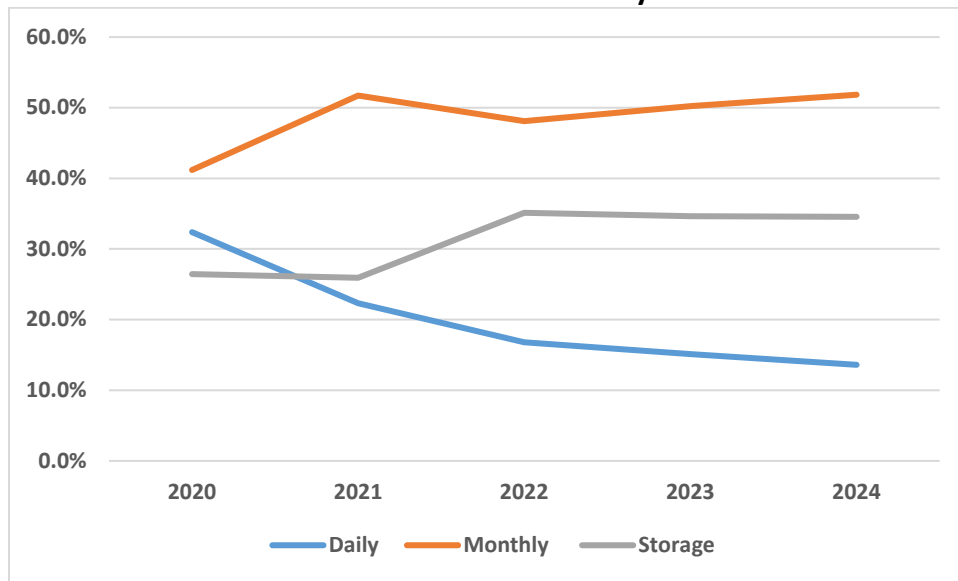
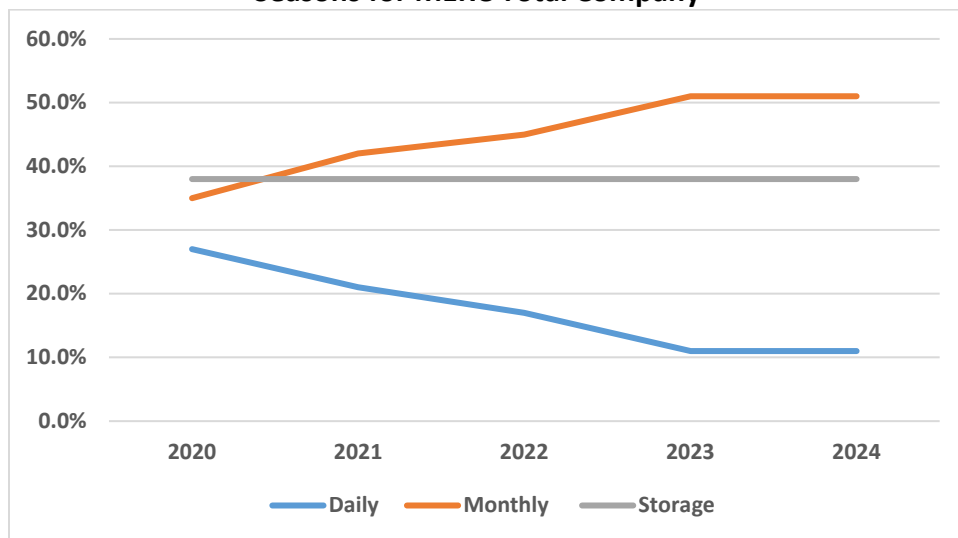


Chart 3 compares 2020-2021 through 2024-2025 winter heating season plans for MERC's entire service area.

Chart 3 - Comparison of Forecasted Purchases for 2020-2021 through 2024-2025 Winter Heating Seasons for MERC Total Company²²



This chart also demonstrates a decrease in daily contracts and increase in monthly contracts and storage remains constant during that five-year period.

²¹ See Attachment 5.

²² 2024 ACF, filed August 1, 2024, at p. 6.

Order Point 6 of the Commission's February 17, 2023, Order requires affected utilities to discuss plans to incorporate more baseload purchases. The Department concludes that MERC has complied with that reporting requirement.

C.3. Storage

Order Point 7 of the Commission's February 17, 2023, Order addressed the topic of MERC "exploring modifications to storage inventory management that could preserve withdrawal capabilities for later in the winter". MERC provided a detailed discussion of its reasoning for using NNG's Three-Step Firm Deferred Delivery (FDD) Service Withdrawal Option in its 2024 ACF of its NNG-served service area.²³ The Department found this passage interesting.

Prior to the 2022-2023 winter, MERC explored options for greater withdrawal capabilities for later in the winter. MERC reviewed the NNG tariffs for storage service and was able to amend its firm storage contract to go from a 4-step storage service to a 3-step storage service. In a 4-step storage service, which MERC had during the 2020-2021 winter, MERC's maximum storage withdrawal capability drops by 23% on February 1, and then drops again on March 1 by another 25%. A 3-step storage service does not reduce its maximum storage withdrawal capability until February 15, extending MERC's full withdrawal rights, which covers MERC for the highest statistical chance of realizing a peak demand day.

The Department considers MERC's approach to be reasonable. During a conference call with the Company in October 2024, the Department asked about MERC's efforts to expand third-party underground storage volumes. The Company responded that it continues efforts to secure additional third-party storage.

The Department notes MERC's efforts and concludes the Company complied with the reporting requirement in the Commission's February 17, 2023, Order at Order Point 7.

C.4. Hedging

Regarding hedging, MERC's most recent filing on this topic was in Docket no. G011/M-20-833. The Commission approved the Company's filing while requiring several reporting requirements. The rule variances necessary to allow the Company to continue its hedging program were approved and this approval will lapse on June 30, 2025.²⁴ MERC's hedging program is consistent with Xcel's and

²³ 2024 Annual Compliance filing filed August 1, 2024, at p. 6.

²⁴ Commission Order dated April 9, 2021, in Docket No. G011/20-833.

CenterPoint's. The Company didn't report any significant changes in any of the compliance filings it submitted during the past several months.

The Department concludes that the Company has complied with Order point #5 in its 2024 ACF.

C.5. Transportation Tariff Modifications

While the Company didn't reference transportation tariff modifications, it did note that it notified its transportation customers well in advance of the January 2024 PE, reminding them of their requirements per the Company's tariff. MERC also was in contact with the marketer for several of the Company's large transportation customers regarding the nominations on behalf of those customers. This helped MERC manage its Supply Reserve Margin.²⁵

C.6. Market Reform – Modifications to the North American Energy Standard Board's (NAESB) Gas Purchasing Contract

This reporting requirement is included in Order Point 4. MERC pursued beneficial reforms to the document but was unsuccessful in its efforts.²⁶ Specifically, a weighted vote by NAESB's participants rejected a proposal sponsored by MERC and several other participants. The Department notes MERC's efforts and concludes the Company complied with the reporting requirement in the Commission's February 17, 2023, Order at Order Point 4.

C.7. Other Reporting Requirements – Peak Shaving, Supply Mix across Different Load and Weather Conditions

MERC doesn't have specific reporting requirements regarding peak shaving, unlike CenterPoint and Xcel. This absence of reporting requirements is reasonable since MERC doesn't have any peaking facilities in Minnesota. That situation could change, however, since the Company noted in its 2024 ACF that it had identified the Farmington area as a potential site for a new peak shaving facility. The Company discussed this possibility in its most recent Contract Demand Entitlement filing for its NNG service area.²⁷ In IR #81, the Department also asked about this topic, particularly about cost estimates and location. The Company explained it had not developed a cost estimate as MERC is currently scoping the project.²⁸

The Department notes MERC's efforts in developing a peak-shaving facility in Minnesota. This reporting requirement may become applicable at some point in the future.

²⁵ Compliance filing submitted January 26, 2024 at p. 3.

²⁶ 2024 ACF, filed August 1, 2024, at p. 3.

²⁷ Docket No. G011/M-23-359.

²⁸ Attachment 6 includes Department IR #81 and MERC's response.

Order Point #10 of the February 17, 2023, Order addresses supply across different load and weather conditions. MERC didn't provide any information on this topic in its 2024 ACF. That is likely because the reporting requirement is tied to a gas utility's "relevant annual, forward-looking gas planning or hedging filing". The Commission doesn't currently require MERC to make that type of filing annually. Once it does, the Department assumes MERC will provide that information in that filing or in its upcoming hedging filing.

C.8. Update on Customer Communications

The February 17, 2023, Order addresses this topic at Order point #11. The Department notes that MERC did make a compliance filing on this topic on November 1, 2021, consistent with the Commission's August 30, 2021, Order Granting Variances and Authorizing Modified Cost Recovery Subject to Prudence Review and Notice of and Order for Hearing (the "August 2021 Order").²⁹ The Company developed protocols for customer outreach using multiple means of communication. MERC also completed a study on the topic of how customers responded to call for voluntary conservation. The study concluded that a high percentage of residential customers were willing to lower their thermostats at the Company's request during periods of high gas prices. Commercial and Industrial customers were not as willing to voluntarily conserve. MERC's conclusion was that a call for conservation of C&I firm sales customers "may not achieve a significant reduction in natural gas usage."³⁰

The Company didn't initiate a call for voluntary conservation during the January 2024 PE. MERC explained its reasoning as the following:

MERC's exposure to price increases in the daily market during January 11 to January 18, 2024, were limited to the Consolidated Purchased Gas Adjustment (PGA) and the amount of needed daily purchases on the Consolidated system were minimal. As such, the Company did not classify the event as requiring a call for conservation from customers, nor did the Company classify the event as requiring a call for economic curtailment of interruptible customers per Section 5 of MERC's Commission-approved tariffs.

C.9. Interruptible Customers Curtailment

MERC participated in the Joint Utilities Economic Dispatch Proposal (EDP) that was filed on September 15, 2022. The Commission rejected the Joint Utilities EDP in its February 17, 2023, Order at Order point #1. The Commission then included a requirement that all the affected utilities file updates to

²⁹ Docket Nos. G999/CI-21-135 and G011/CI-21-611.

³⁰ 2024 ACF, filed August 1, 2024, at p. 9.

their existing interruptible tariffs to address economic interruptions at Order point #2. The Commission also noted the affected utilities could also propose new or alternative interruptible tariffs.³¹

It is the Department's understanding that the Company will update its interruptible tariffs in its next general rate case. It is also the Department's understanding that MERC has not completely complied with the Commission's reporting requirement on this topic, but functionally the Company is using gas commodity prices as an input into its protocol for curtailing interruptible customers.

Turning to the January 2024 PE, MERC noted that it didn't initiate interruptible curtailment for economic purposes.

Department information request #77 asked the Company for an estimate of the avoided gas costs if MERC had elected to curtail its interruptible customers during the January 2024 PE. The Company's response was:

MERC's decision not to economically curtail was due to the market prices being in the \$4-\$7/Dth range at Emerson at the time the decision was needed to be made to conduct daily spot purchases (which was by 8:15 a.m. the day before the flow date) which is below the price (\$20/Dth) at which MERC would consider economically curtailing interruptible.

MERC also noted the holiday weekend required it to purchase gas for the following Saturday through Tuesday (January 13th-17th) and to have purchased that gas by 8:15 a.m. on Friday January 12th. Given the timing of events, the Company estimated the actual avoided gas costs associated with curtailing its interruptible customers during the January 2024 PE to be \$0. MERC did include a theoretical estimate of avoided gas costs in its response as well. That amount was equal to \$141,292.³²

The Company's success in mitigating short-term price risk in the daily market for natural gas for both its NNG and Consolidated PGA areas allowed it the flexibility not to have to curtail interruptible customers for economic purposes during the January 2024 PE.

While the Department understands the economic reasoning for the Company not curtailing its interruptible customers in this case, there is also a process argument that suggests the more often a gas utility curtails its customers, the more accustomed the customers will become to being curtailed. MERC missed an opportunity to reinforce that mechanism by not curtailing any interruptible customers during the January 2024 PE.

³¹ February 17, 2023, Order at Order Pt. 2.

³² Attachment 7 includes Department IR #77 as well as the Company's response. The Department also notes that the Office of the Attorney General's Residential Utilities Division (OAG-RUD) in OAG IR #13 in Docket no. G999/CI-21-135 asked a series of questions regarding the specifics of the Company's interruptible program during the January 2024 PE. That IR is included as Attachment 8 to the Department's Comments.

C.10. Supply Margin Reserve

This issue was initially discussed in the Direct Testimony of Matthew J. King from GDS Associates on behalf of the Department.³³ Mr. King noted that it is a typical practice for a gas utility to hold sufficient firm transportation rights and local resources to meet the utility's usage on the historically coldest day it has recorded and the corresponding forecasted demand on its distribution system. The difference between the supply and demand is defined as the Supply Reserve Margin. In its February 17, 2023, Order, the Commission included a requirement that utilities focus on improving their supply reserve margin efforts to minimize those quantities.

MERC discussed its efforts to develop a more accurate forecast in its transportation customers in its IC.³⁴ The Company had had some issues with that forecast during the February 2021 PE which affected its supply reserve margin. The Company discussed this topic in its 2024 ACF revisiting its earlier discussion about the improvements to the transportation forecast.³⁵ The small amount of extra gas commodity costs MERC incurred during the January 2024 PE suggests that the Company's efforts to improve its supply reserve margin have been successful.

The Department notes the Company's efforts and concludes MERC complied with the reporting requirement in the Commission's February 17, 2023, Order at Order Point 8.

C.11. Gas IRP Update

The Department didn't identify any specific information regarding this topic in the Company's 2024 ACF. The Company had discussed this topic in Initial Comments.³⁶ MERC suggested pursuing that issue in Docket No. G999/CI-21-565, also known as "the future of gas" docket.

D. COMPARISON OF MERC'S RESPONSES TO THE JANUARY 2024 AND FEBRUARY 2021 PRICING EVENTS

D.1. Gas Delivered During the January 2024 Pricing Event - Volumes and Prices

In response to the reporting requirement in the Commission's February 17, 2023 Order at Order point 3.A, MERC listed two purchases the Company had made during the January 2024 PE that met the Commission's threshold criterion of exceeding five times the gas commodity cost included in the Company's current monthly PGA.³⁷ The Department's preliminary estimate of total costs MERC

³³ Direct Testimony of Matthew J. King – Revised, Docket No. G002/CI-21-610, filed February 14, 2022, at p. 17.

³⁴ Initial Comments, September 15, 2022, at p.7.

³⁵ 2024 ACF, filed August 1, 2024, at p. 8.

³⁶ IC filing submitted September 15, 2022, at p. 10 -11.

³⁷ Compliance filing in Docket No. G011/CI-21-611, filed January 26, at p. 2.

incurred during the four-day event for contracts that met the “five times” criterion is \$285,832 and the total volume purchased is 17,600 Dths. The Company verified the Department’s estimated cost in its response to Department IR #88.³⁸

The two contracts MERC noted in its January 26, 2024, Compliance filing was:

- A Supply Call Option for 3,000 Dth/day for January 13th through the 17th at \$16.215/Dth at the Emerson hub to flow to the Viking pipeline to MERC’s Consolidated PGA service area.
- A Supply Call Option for 1,400 Dth/day for January 13th through the 17th at \$16.295/Dth at the Centra-Spruce location to flow to the Centra pipeline on the Company’s Consolidated PGA service area.³⁹

The Company also noted that both contracts were priced on the Platt’s Gas Daily Midpoint Gas Daily Emerson Viking GL index.

The results of MERC’s efforts to mitigate short-term price spike during the January 2024 PE relative to its efforts during the February 2021 PE are notable. Table 1 summarizes this information.

Table 1 – Comparison of MERC’s Gas Commodity Costs for the February 2021 and January 2024 Pricing Events

Event	Cost/Recovery Mechanism	Amount (\$)	Percentage Feb 2021 PE Costs (%)
Feb. 2021 PE			
	AAA	\$ 13,625,525	18.0%
	Extraordinary Gas Costs	\$ 61,975,882	82.0%
	Total	\$ 75,601,407	100.0%
Jan. 2024 PE			
	Dailiy Gas Cost greater than 5x PGA	\$ 285,832	0.378%

While the Department recognizes the February 2021 and January 2024 pricing events were far from identical, and that company-specific differences in the location of interstate pipeline interconnections and numerous other factors influence the costs, the difference in the magnitude of the costs for the two events is notable.

³⁸ Attachment 9 includes Department IR #88 and the Company’s response.

³⁹ See January 26, 2024, compliance filing at p. 2.

Table 2 provides some additional context regarding the magnitude of the February 2021 and the January 2024 pricing events on Minnesota ratepayers served by the three of the four affected companies.⁴⁰

Table 2 – Comparison of MERC’s Gas Commodity Costs for the February 2021 and January 2024 Pricing Events to CenterPoint, and Great Plains Natural Gas’ Gas Commodity Costs

Company	Event	Description	Amount (\$)	% of Feb 2021 PE Costs
Great Plains	Feb. 2021	Total	\$ 12,608,301	NA
	Jan. 2024	Gas Cost greater than 5x PGA	\$ 778,880	6.18%
MERC	Feb. 2021	Total	\$ 75,601,407	NA
	Jan. 2024	Gas Cost greater than 5x PGA	\$ 285,832	0.38%
CenterPoint	Feb. 2021	Total	\$ 466,100,182	NA
	Jan. 2024	Gas Cost greater than 5x PGA	\$ 46,975,064	10.08%
Feb 2021 Total			\$ 554,309,890	
Jan 2024 Total			\$ 48,039,776	8.67%

The Company’s efforts to mitigate short-term price risk during the January 2024 PE were impressive. Given the somewhat fluid nature of the wholesale natural gas market, the Department hopes that MERC will be able to secure an adequate quantity of Supply Call Options to mitigate this risk in the future.

D.2. Stress Test Analysis

Department IR #86 referenced a filing in the Gas IRP proceeding that included the following description of an analysis the intervenor thought necessary: “stress test the resource portfolios performance and costs with, at a minimum, the following conditions:

- 1) A winter storm screening: an analysis that tests portfolios during the conditions and gas prices like those experienced during Winter Storm Uri (February 2021 PE)”.⁴¹

The Department asked the Company to complete this analysis using MERC’s 2024 supply portfolio, gas prices and weather conditions like those experienced during the February 2021 PE. The Department believed an analysis of those factors would be useful as a point of comparison for the differences between the two pricing events.

MERC did complete that analysis.⁴² The Company considered three difference scenarios using historical information from the February 2021 PE:

⁴⁰ Xcel’s information is classified as **TRADE SECRET**.

⁴¹ Docket No. G999/CI-23-117, Citizens Utility Board Integrated Resource Planning Proposal, filed October 24, 2023, at p. 33.

⁴² The Department also asked CenterPoint, Xcel, and Great Plains to perform this same analysis. All three companies declined for various reasons.

- a) Highest Price Scenario – The highest indices occurred on February 17th. A comparison of the 2021 portfolio versus the January 2024 portfolio using this information calculated a decrease in costs of \$13,603,903.
- b) Coldest Day Scenario – the coldest day in MERC’s service territory was February 13th. A comparison of the 2021 portfolio versus the January 2024 portfolio using this information calculated a decrease in costs of \$15,118,417.
- c) 2024 Design Day Scenario – This scenario was a combination of the highest prices and the Company Design Day demand. A comparison of the 2021 portfolio versus the January 2024 portfolio using this information calculated a decrease in costs of \$15,830,851.⁴³

The Department’s conclusion after reviewing this analysis is that MERC’s January 2024 portfolio relied more on storage and baseload purchases and much less on spot or daily gas purchases than they did in the Company’s February 2021 portfolio. These differences would have resulted in cost savings around \$13 to \$16 million in the February 2021 PE for ratepayers if similar conditions to the February 2021 pricing event would have occurred in January 2024.

Both those changes are consistent with the Commission’s directives in these dockets and provided benefits to ratepayers in the January 2024 PE.

The Department notes that it was required to use previously submitted information provided in this proceeding to develop an analysis of the cost savings resulting from changes to the gas purchasing portfolios for CenterPoint and Xcel due to those companies unwillingness to complete the analysis requested in Department IR #86. The Department didn’t perform that analysis in this docket due to MERC’s completing the requested analysis.

D.3. Curtailment of Interruptible Customers and Voluntary Conservation Efforts

The Department reviewed MERC’s efforts regarding these two topics in a previous section. The Department does note that MERC didn’t curtail interruptible customers or initiated a customer communication effort during the January 2024 PE.

E. EXTRAORDINARY GAS COST-RECOVERY AND MISCELLANEOUS

E.1. Recovery of Extraordinary Gas Costs

The Department provided an update on the Company’s efforts to recover the Extraordinary Gas Costs (EGCs) resulting from the February 2021 PE in its comments on MERC’s 2023 ACF. The Department thought it wise to include a similar update for the Company’s 2024 ACF.

⁴³ **TRADE SECRET** of Attachment 10 includes additional detail on the actual calculations regarding MERC’s response to Department IR #86..

On April 1, 2024, MERC filed its quarterly report related to the recovery of costs associated with February gas market conditions. In Attachment A of that filing, the Company noted that it had recovered \$61,166,064 of the Commission approved amount of \$61,975,882 of Extraordinary Gas Costs in this docket. The under-recovery balance for this account was \$809,818. The Company also stated that consistent with its tariff, MERC would seek approval from the Commission of that under-recovered balance via the Annual Automatic Adjustment (AAA) Report that was to be filed September 1, 2024.

In Department IR #87 the Department asked if MERC had requested recovery of the \$809,818 under-recovery in the 2024 AAA Report.⁴⁴ The Company confirmed that it had.⁴⁵

The Department has no concerns relative to this matter. MERC's proposal appears to be consistent with the Commission's directions. Assuming the Company's 2024 AAA is approved with that cost included in the PGA True-up, the Company will have completely recovered the gas commodity costs resulting from the February 2021 pricing event.

E.2. Recovery of January 2024 PE Gas Costs

The Department assumes that MERC will propose to recover the \$285,832 of additional gas commodity costs incurred during the January 2024 pricing event in the Company's September 2024 AAA Report as well. The basis for this conclusion is that MERC has not requested a variance to the PGA rules that would allow it to employ an approach like that which it used for the February 2021 PE.

IV. RECOMMENDATIONS

Based on analysis of MERC's 2024 ACF and the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

A. RESPONSE TO COMMISSION QUESTIONS

The Department recommends the Commission:

- A.1. - conclude MERC's 2024 ACF complies with the Commission's Orders in this proceeding.
- A.2. – accept and approve MERC's 2024 ACF.
- A.3. – not make any changes to future compliance filing requirements.
- A.4 – conclude no issues or concerns at this time.

B. SUMMARY OF MERC'S GAS PRACTICES COMMENTS

⁴⁴ Docket No. G999/AA-24-138.

⁴⁵ Attachment 11 contains a copy of Department IR #87 and MERC's response.

The Department has no recommendations regarding this section.

*C. UPDATE ON MERC'S EFFORTS TO MITIGATE THE RISK OF SHORT-TERM
NATURAL GAS PRICE SPIKES*

The Department recommends the Commission accept the Company's 2024 Annual Compliance filing as being compliance with the Commission's reporting requirements regarding that filing included in its February 17, 2023, Order.

*D. COMPARISON OF MERC'S RESPONSES TO THE JANUARY 2024 AND
FEBRUARY 2021 PRICING EVENTS*

The Department notes that its comparison of the Company's purchasing strategies during the two pricing events suggests that changes to MERC's contracting and purchasing strategies, including supply call options, as well as increased use of storage products, mitigated some of the short-term risk of price spikes.

The Department has no recommendations regarding this section.

E. EXTRAORDINARY GAS COST RECOVERY AND MISCELLANEOUS

The Department has no recommendations regarding this section.

ATTACHMENTS

Attachment 1 – Detailed Procedural Background for Docket No. G011/CI-21-611

February 12 through 22, 2021	A combination of significant disruptions in natural gas supply combined with a sharp rise in natural gas demand, led to an extraordinary increase in natural gas spot market prices in Minnesota. The effects of the price spike were amplified by the closure of the wholesale natural gas markets for the three-day Presidents Day holiday weekend (February 2021 Pricing Event) .
February 19, 2021	CenterPoint filed a letter with the Commission in Docket No. G008/M-21-138 noting the severity of its gas cost under-recovery and indicating a concern that the existing Annual Automatic Adjustment (AAA) might be inadequate to address an under-recovery of this magnitude.
February 23, 2021	The Commission held a Planning Meeting regarding the February 2021 Pricing Event (PE) and authorized an investigation into the PE in Docket No. G999/CI-21-135.
March 2, 2021	The Commission issued an Order Opening Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers in Docket No. G999/CI-21-135.
March 10, 2021	The Commission issued a request for initial filings and notice of comments period with an initial date of April 9, 2021, in Docket No. G008/M-21-135.
May 13, 2021	The Commission discussed procedural issues regarding the two dockets at its weekly Agenda Meeting.
May 19, 2021	The Commission issued a notice of comment period which included questions related to the prudence and potential recovery of costs associated with the February 2021 PE.
May 20, 2021	MERC filed reply comments to Commission Notice dated April 1, 2021. Many other parties filed reply comments as well.
June 9, 2021	The OAG-RUD filed a letter requesting an extension for filing comments until July 8, 2021 in response to the Commission's May 19, 2021 notice of comment.
June 14, 2021	The Commission issued a notice of extension variance for comments on prudence but maintaining previous comment periods for other topics until July 6, 2021.
July 6 - 16, 2021	CUB/ECC, CenterPoint, City of Minneapolis (Minneapolis) and OAG-RUD filed comments. The Gas Utilities (CenterPoint, Great Plains, MERC and Xcel) filed joint comments in response to the Commission's May 10 th NOC.
July 19, 2021	MERC, CUB/ECC, the Department, the Gas Utilities, the Suburban Rate Authority (SRA), and Minneapolis filed reply comments.

August 2, 2021	OAG-RUD filed a letter correcting the disallowances it had proposed.
August 30, 2021	The Commission issued its ORDER GRANTING VARIANCES AND AUTHORIZING MODIFIED COST RECOVERY SUBJECT TO PRUDENCE REVIEW, AND NOTICE OF AND ORDER FOR HEARING. This Order created Docket No. G002/CI-21-611.
September 20, 2021	The OAH issued its first prehearing Order.
October 22, 2021	CenterPoint, Xcel, and the Joint Gas Utilities filed direct testimony.
November 1, 2021	CPE, Great Plains, MERC and Xcel filed a joint communication plan compliance filing.
December 22, 2021	CUB, the Department, and OAG-RUD filed direct testimony.
January 21, 2022	CenterPoint, Xcel and the Joint Utilities filed rebuttal testimony.
February 11, 2022	CUB, the Department and OAG-RUD filed surrebuttal testimony.
February 17, 18, and 23, 2022	OAH held evidentiary hearings.
March 15, 2022	CenterPoint, CUB, the Department, the Joint Utilities, and OAG-RUD filed briefs.
March 25, 2022	CenterPoint, the Department and OAG-RUD filed reply briefs.
May 24, 2022	OAH filed its report on findings of fact, conclusions of law and recommendation.
June 3 and 6 2022	CPE, CUB, the Department, LIUNA/Minnesota/North Dakota and Minneapolis filed exceptions to the Administrative Law Judges Report
August 23, 2022	The MPUC issued a notice of comment on forward-looking issues.
September 15, 2022	Joint Commenters filed comments.
October 14, 2022	CUB, the Department and the OAG-RUD filed reply comments.
October 19, 2022	The Commission issued its ORDER ADOPTING SETTLEMENT in this docket. The Commission also issued a second order that day - ORDER DISALLOWING CERTAIN NATURAL GAS COSTS AND REQUIRING FURTHER ACTION.
February 17, 2023	The Commission issued its ORDER REQUIRING ACTIONS TO MITIGATE IMPACTS FROM FUTURE NATURAL GAS PRICE SPIKES, SETTING FILING REQUIREMENTS, AND INITIATING A PROCEEDING TO ESTABLISH GAS RESOURCE PLANNING REQUIREMENTS.
August 1, 2023	MERC filed its 2023 annual compliance filing.
October 6, 2023	Commission issued a notice of comments on MERC's annual compliance filing.
November 1, 2023	The Department filed comments.
November 13, 2023	MERC filed reply comments.
January 26, 2024	MERC filed compliance on cost impacts due to extreme market conditions.
March 28, 2024	Commission approved MERC's 2023 compliance filing.

July 30, 2024

Commission issued order accepting and approving MERC's 2023 Annual Compliance Filing.

August 1, 2024

MERC filed its 2024 Annual Compliance Filing (ACF).

August 29, 2024

Commission issued a notice of comment period for MERC's 2024 ACF.



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G011/CI-21-611

Requested From: Joylyn Hoffman-Maleug, MERC

Type of Inquiry: General

☐ Nonpublic ☒ Public

Date of Request: 11/1/2024

Response Due: 11/12/2024

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): John Kundert

Email Address(es): john.kundert@state.mn.us

Phone Number(s): 651-539-1740

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number:	85
Topic:	Estimate of extraordinary gas costs for January 2024 pricing event
Reference(s):	None

Request:

1. Did MERC purchase any gas on NNG during the January 2024 pricing event that met the Commission's definition of "Extraordinary Gas Costs" developed for this proceeding?
2. If not, please explain how the Company modified its gas supply processes to be able to avoid purchasing for any natural gas gas on NNG during the January 2024 pricing event.
3. Did MERC purchase any gas on the Centra, Great Lakes or Viking pipelines during the January 2024 pricing event that met the Commission's definition of "Extraordinary Gas Costs" developed for this proceeding?
4. What was the total cost of daily gas purchased on those three pipelines during the January 2024 pricing event?

MERC Response:

1. No.
2. For the 2023-2024 winter heating season, MERC issued several requests for proposal ("RFPs") as part of an Asset Management Agreement ("AMA") that includes capacity releases and call options that have traditionally been based on daily prices, but were requested to be based on first-of-month ("FOM") pricing. Despite there being minimal interest by counterparties to offer FOM call products in past years, MERC was able to execute an agreement that includes FOM call supply at several Northern Border Pipeline and Northern Natural Gas interconnects. The other RFP was at a different supply basin (NNG Ventura) which resulted in no suppliers submitting responses. MERC will continue to explore physical products that contribute to protecting customers from daily price spikes.

To be completed by responder

Response Date: 11/12/2024

Response by: Joshua J Fieber

Email Address: Joshua.fieber@wecenergygroup.com

Phone Number: 920-433-1805



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Additionally, since the 2020-2021 winter season, MERC has increased its baseload volumes in an effort to minimize its exposure to daily prices. Further protection from daily prices will be attained with the re-contracting of a monthly-priced supply call. While MERC has been successful in reducing the exposure to daily prices, it continues to look at variations of supply mix that minimize exposure to daily prices while also contracting for a volume of supply that ensures adequate, reliable supply to meet the Company's demand. Overall, MERC has been consistently able to reduce its exposure to daily prices, as can be seen in the below table:

MERC Total Supply Mix	2020-21	2021-22	2022-23	2023-24	2024-25
Daily Priced	27%	21%	17%	11%	11%
Monthly Priced	35%	42%	45%	51%	51%
Storage	38%	38%	38%	38%	38%

Additionally, MERC converted its NNG Storage Service from a 3-Step service to 4-Step service. By doing this MERC, was allowed (in February) to max withdraw gas during the first half of the month at the same max withdrawal rate as November through January, but then a lesser max withdrawal rate during the second half of February. Whereas in the 3-Step Service, the max daily withdrawal rate for the full month of February is set at a level less than the November through January rate but above max withdrawal rate than the second half of February in the 4-Step Service. A 4-Step service gives MERC a higher rate of withdrawal during the first of half February when the chances of an extreme cold condition is more likely to occur. See the below tables for 3-Step vs 4-Step Services withdrawal rights (listed under the header "Daily Maximum Withdrawal (FDQ)").

To be completed by responder

Response Date: 11/12/2024

Response by: Joshua J Fieber

Email Address: Joshua.fieber@wecenergygroup.com

Phone Number: 920-433-1805



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3-Step Service

Withdrawal Period		
Period	Daily Maximum Withdrawal FDQ	Daily Maximum Injection FDQ
November	104,402	24,184
December	104,402	24,184
January	104,402	24,184
February	80,642	24,184
March	54,721	24,184
April	32,401	12,092
May	Overrun (Interruptible)	Overrun (Interruptible)

4-Step Service

Withdrawal Period		
Period	Daily Maximum Withdrawal FDQ	Daily Maximum Injection FDQ
November	104,402	24,184
December	104,402	24,184
January	104,402	24,184
February 1-14	104,402	24,184
February 15-28	54,721	24,184
March	54,721	24,184
April	32,401	12,092
May	Overrun (Interruptible)	Overrun (Interruptible)

Lastly, MERC was able to enhance its forecasting practice by isolating the large electric generation demand from the overall system demand. This allows for less uncertainty of Transportation deliveries and the impact of the electric generation demand. Eliminating this variability allows MERC to better align supplies to demand forecasts and minimize the potential need to purchase daily priced gas during price spike periods.

- In its August 30, 2021 Order in the above-referenced docket, the Commission stated “The Commission....finds it reasonable to define extraordinary costs for purposes of these dockets as the margin between \$20/Dth and the actual average daily price experienced by the utilities during the February Event.” MERC understands this as being the Commission’s definition of extraordinary costs. MERC paid \$16.215/Dth for 3,000 Dth/day of gas at the Emerson hub to flow to the Viking pipeline on the Consolidated system, and paid \$16.295/Dth for 1,400 Dth/day at the Centra-Spruce location to flow to the Centra pipeline on the Consolidated System. Both of these purchases were below \$20/Dth.

To be completed by responder

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-
4. Total cost of daily purchases on the three pipelines of Centra, Great Lakes and Viking was \$214,374 during January 13th, 14th and 15th. The cost of daily purchases on the NNG pipeline during the January 2024 price event was \$0.

To be completed by responder

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Request Number:	78
Topic:	Geographic Diversity of Supply
Reference(s):	None

Request:

1. Please provide a narrative that explains the Company's efforts since 2021 to increase the geographic diversity of its gas supply contracting and purchasing efforts.
2. If applicable, please include estimates of the costs and benefits of that effort to ratepayers.

MERC Response:

1. MERC ensures that it procures its gas supply at the locations that are identified as the primary receipt location on their transportation service agreements (aka capacity). This is to maximize the reliability of gas deliveries, as using capacity at a location other than the contractual primary locations will likely result in some gas not being delivered.

The other opportunity that would allow for more geographic diversity is for when new pipeline capacity purchases are made. Since 2021, MERC has made several capacity purchases to meet its peak day requirements. Below is a summary of each of those instances:

- a) 2021 Centra Pipeline: Increased contracted volumes from 9,600 dth/day to 9,800 dth/day. There is currently not another liquid location that would provide another reliable supply source for the incremental capacity.
- b) 2022 Viking Pipeline: Increased contracted volumes from 1,500 dth/day to 2,600 dth/day. This was at the Chisago receipt location, which provides some diversity from the large majority of the supply being sourced from Emerson, which is a supply basin that primarily gets gas sourced from Canada.

To be completed by responder

Response Date: 11/12/2024

Response by: Joshua J Fieber

Email Address: Joshua.fieber@wecenergygroup.com

Phone Number: 920-433-1805



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Information Request

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-
- c) 2022 Centra Pipeline: Increased contracted volumes from 9,800 dth/day to 9,900 dth/day. There is currently not another liquid location that would provide another reliable supply source for the incremental capacity.
 - d) 2023 NNG Pipeline: Capacity purchase of 1,709 dth/day via the Ventura North Generally Available Open Season. The NNG Ventura North Generally Available Open Season only allowed for Ventura as the receipt location, therefore there were no other available options presented when bidding into the Open Season.
 - e) 2023 Viking Pipeline: Capacity purchase of 3,100 dth/day via a Viking Open Season. Viking Gas Transmission's Open Season limited the receipt point of the capacity to only the Emerson location, therefore no other options were available.
 - f) 2024 Centra Pipeline: Increase of contracted volumes from 9,900 dth/day to 10,108 dth/day. There is currently not another liquid location that would provide another reliable supply source for the incremental capacity.
 - g) 2024 Great Lakes Gas Transmission: Capacity purchase of 2,202 dth/day via a GLGT Open Season. GLGT's Open Season limited the receipt point of the capacity to only the Emerson location, therefore no other options were available.
 - h) 2024 NNG Pipeline: Two capacity purchases totaling 4,777 dth/day via two NNG Open Seasons. 4,000 dth/day was purchased as part of the 2024 Ventura North Generally Available Open Season, which only allowed for a receipt location of Ventura. The remaining 777 dth/day purchase was via the 2024 West Leg Generally Available Open Season that only allowed for a receipt location of NBPL/NNG Welcome.
2. None of the above capacity purchases had options for considering alternate supply locations, due to the pipeline locations. All purchases were done at the Tariff Rates with the benefits to MERC customers being realized by providing adequate peak day plus reserve margin entitlement.

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Request Number:	82
Topic:	Pipeline Capacity Contracts
Reference(s):	None

Request:

1. Please provide a narrative that explains the Company's efforts since 2021 to use its transportation capacity on interstate or in-state pipelines (gas purchased during the heating season using different contract terms) to mitigate the risk of short-term price spikes.
2. Please include an estimate of the costs and benefits of the Company's effort referenced in (1) to ratepayers.

MERC Response:

1. There have not been any meaningful options to utilize the Company's transportation capacity on the interstate pipelines differently to mitigate the risk of short-term price spikes. Further, the pipelines have not offered any service changes that could allow for the transportation capacity to be used any differently to mitigate the risk of short-term price spikes.
2. n/a

To be completed by responder

Response Date: 11/12/2024

Response by: Joshua J Fieber

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Requested From: Joylyn Hoffman-Maleug, MERC
Type of Inquiry: General

☐ Nonpublic ☒ Public
Date of Request: 11/1/2024
Response Due: 11/12/2024

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): John Kundert
Email Address(es): john.kundert@state.mn.us
Phone Number(s): 651-539-1740

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 79
Topic: Annual Winter Season Supply Plan by PGA Area
Reference(s): Customer Protection Plan filed September 15, 2022, at p. 3. August 1, 2024 Compliance filing at p. 6

Request:

1. Please complete the following tables 1 and 2.

Table 1 – NNG PGA Area

NNG		2020-2021		2021- 2022		2022-2023		2023-2024		2024-2025	
		Winter Plan		Winter Plan		Winter Plan		Winter Plan		Winter Plan	
Line No.	Purchases	Dth	Percent	Dth	Percent	Dth	Percent	Dth	Percent	Dth	Percent
1.	Daily	71,661	25.5%	58,635	20.7%	50,000	17%				
2.	Monthly	96,060	34.2%	111,000	39.3%	128,000	44%				
3.	Storage	113,075	40.3%	113,075	40.0%	113,075	39%				
4.	Total System Purchases	280,796	100%	282,710	100%	291,075	100%				
5.	Transport (3rd Party)	-		-		-	-	-	-	-	-
6.	Total System Supply	280,796		282,710		291,075	-	-	-	-	-

(Continued on next page)

To be completed by responder

Response Date: 11/12/2024
Response by: Joshua J Fieber
Email Address: Joshua.fieber@wecenergygroup.com
Phone Number: 920-433-1805



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G011/CI-21-611
Requested From: Joylyn Hoffman-Maleug, MERC
Type of Inquiry: General

☐ Nonpublic ☒ Public
Date of Request: 11/1/2024
Response Due: 11/12/2024

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Table 2 – CON PGA Area

CON		2020-2021		2021-2022		2022-2023		2023-2024		2024-2025	
		Winter Plan		Winter Plan		Winter Plan		Winter Plan		Winter Plan	
Line N	Purchases	DTH	Percent	DTH	Percent	DTH	Percent	DTH	Percent	DTH	Percent
1.	Daily	18,481	32.4%	13,000	22.3%	9,600	17%				
2.	Monthly	23,500	41.2%	30,100	51.7%	27,500	48%				
3.	Storage	15,084	26.4%	15,084	25.9%	20,086	35%				
4.	Total System Purchases	57,065	100%	58,184	100%	57,186	100%				
5.	Transport (3rd Party)	-		-		-		-		-	
6.	Total System Supply	57,065		58,184		57,186		-		-	

MERC Response:

To be completed by responder

Response Date: 11/12/2024
Response by: Joshua J Fieber
Email Address: Joshua.fieber@wecenergygroup.com
Phone Number: 920-433-1805



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NNG		2020-2021		2021-2022		2022-2023		2023-2024		2024-2025	
		Winter Plan		Winter Plan		Winter Plan		Winter Plan		Winter Plan	
Line No.	Purchases	Dth	Percent	Dth	Percent	Dth	Percent	Dth	Percent	Dth	Percent
1.	Daily	71,661	25.5%	58,635	20.7%	50,000	17%	30,000	10.3%	30,000	10.3%
2.	Monthly	96,060	34.2%	111,000	39.3%	128,000	44%	147,900	50.8%	147,883	50.8%
3.	Storage	113,075	40.3%	113,075	40.0%	113,075	39%	113,075	38.9%	113,075	38.9%
4.	Total System Purchases	280,796	100%	282,710	100.0%	291,075	100%	290,975	100.0%	290,958	100%
5.	Transport ^{1/} (3rd Party)	200,266		208,652		205,604		201,110		201,110	
6.	Total System Supply	481,062		491,362		496,679		492,085		492,068	

1/: Winter's 2020-24 Transport volumes are the observed actual Transport volumes. Winter 2024-25 Volumes reference Winter 2023-2024 Transport Volumes.

CON		2020-2021		2021-2022		2022-2023		2023-2024		2024-2025	
		Winter Plan		Winter Plan		Winter Plan		Winter Plan		Winter Plan	
Line No.	Purchases	Dth	Percent	Dth	Percent	Dth	Percent	Dth	Percent	Dth	Percent
1.	Daily	18,481	32.4%	13,000	22.3%	9,600	17%	8,800	15.1%	7,900	13.6%
2.	Monthly	23,500	41.2%	30,100	51.7%	27,500	48%	29,200	50.2%	30,110	51.8%
3.	Storage	15,084	26.4%	15,084	25.9%	20,086	35%	20,127	34.6%	20,072	34.6%
4.	Total System Purchases	57,065	100%	58,184	100.0%	57,186	100%	58,127	100.0%	58,082	100%
5.	Transport ^{1/} (3rd Party)	35,495		39,077		37,749		35,660		35,660	
6.	Total System Supply	92,560		97,261		94,935		93,787		93,742	

1/: Winter's 2020-24 Transport volumes are the observed actual Transport volumes. Winter 2024-25 Volumes reference Winter 2023-2024 Transport Volumes.

To be completed by responder

Response Date: 11/12/2024
Response by: Joshua J Fieber
Email Address: Joshua.fieber@wecenergygroup.com
Phone Number: 920-433-1805



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G011/CI-21-611

Requested From: Joylyn Hoffman-Maleug, MERC

Type of Inquiry: General

☐ Nonpublic ☒ Public

Date of Request: 11/1/2024

Response Due: 11/12/2024

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): John Kundert

Email Address(es): john.kundert@state.mn.us

Phone Number(s): 651-539-1740

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Request Number:	81
Topic:	Peak Shaving
Reference(s):	2024 Annual Compliance Filing, filed August 1, 2024, at p.6.

Request:

1. Does the Company have a preliminary cost estimate or estimates for the potential peak shaving facility that would be located near Farmington, Minnesota?
2. What would be the likeliest in-service date for that facility?

MERC Response:

1. MERC is in the planning stages of scoping out the size and capabilities of a potential peak shaving facility. There is currently not a cost estimate known until the final size and capabilities have been determined.
2. There is currently no planned in-service date as MERC is still in the process of scoping out a potential project.

To be completed by responder

Response Date: 11/12/2024

Response by: Joshua J Fieber

Email Address: Joshua.fieber@wecenergygroup.com

Phone Number: 920-433-1805



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G011/CI-21-611

Requested From: Joylyn Hoffman-Maleug, MERC

Type of Inquiry: General

☐ Nonpublic ☒ Public

Date of Request: 11/1/2024

Response Due: 11/12/2024

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): John Kundert

Email Address(es): john.kundert@state.mn.us

Phone Number(s): 651-539-1740

ADDITIONAL INSTRUCTIONS:

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Request Number: 77
Topic: Interruptible Customer Curtailment
Reference(s): January 26 Compliance Filing, page 2

Request:

The Company stated:

“MERC paid \$16.215/Dth for 3,000 Dth/day of gas at the Emerson hub to flow to the Viking pipeline on the Consolidated system. MERC also paid \$16.295/Dth for 1,400 Dth/day at the Centra-Spruce location to flow to the Centra pipeline on the Consolidated System.”

1. What is the weighted average cost of gas when those two purchases are combined?
2. Assuming the weighted average cost of gas is approximately \$16.240/Dth., please provide an estimate of the avoided gas costs that would have occurred if MERC’s had curtailed the interruptible customers on the CON system on January 14th, 15, and 16th.

MERC Response:

1. The weighted average cost of gas (“WACOG”) when the two purchases are combined is \$16.2405/Dth.
2. MERC’s decision not to economically curtail was due to the market prices being in the \$4-\$7 range at Emerson at the time the decision was needed to be made to conduct daily spot purchases (which was by 8:15 a.m. the

To be completed by responder

Response Date: 11/12/2024

Response by: Joshua J Fieber

Email Address: Joshua.fieber@wecenergygroup.com

Phone Number: 920-433-1805



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G011/CI-21-611

Requested From: Joylyn Hoffman-Maleug, MERC

Type of Inquiry: General

☐ Nonpublic ☒ Public

Date of Request: 11/1/2024

Response Due: 11/12/2024

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): John Kundert

Email Address(es): john.kundert@state.mn.us

Phone Number(s): 651-539-1740

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day before the flow date), which is below the price (\$20 / dth) in which MERC would consider economically curtailing interruptible.¹

If MERC requested interruptible customers to curtail 100% of their load over the January 14th, 15th and 16th period, it would not have impacted the volumes MERC purchased on the daily spot market due to MERC being required to make that purchase decision by 8:15 a.m. the day before. Therefore, in actuality, the avoided gas costs would be \$0.

When mathematically computing reducing MERC's interruptible customer load over the January 14th, 15th, and 16th period to zero (i.e. 100% curtailment and assuming customers comply 100% for the entire time period), assuming MERC was able to forecast their load with 100% accuracy to the customers' actual usage, the decreased load would have resulted in a decrease in purchases down (from 4,400 dth/day) to 1,500 dth/day. The 2,900 dth/day reduction in purchases, based on the WACOG of \$16.2405/dth provided in 1) above, amounts to \$141,292.

¹ In its August 30, 2021 Order in the above-referenced docket, the Commission stated "The Commission....finds it reasonable to define extraordinary costs for purposes of these dockets as the margin between \$20/Dth and the actual average daily price experienced by the utilities during the February Event."

To be completed by responder

Response Date: 11/12/2024

Response by: Joshua J Fieber

Email Address: Joshua.fieber@wecenergygroup.com

Phone Number: 920-433-1805

OAG No. MERC-013

**State of Minnesota
Office of the Attorney General
Utility Information Request**

*In the Matter of the Commission MPUC Docket No. G-999/CI-21-135
Investigation into the Impact of Severe
Weather in 2021 on Impacted Minnesota
Natural Gas Utilities and Customers*

Requested from: Minnesota Energy
Resources Corporation

Requested by: Katherine Hinderlie **Date of Request:** August 8, 2024
Due Date: August 20, 2024

Reference: Minnesota Energy Resources Corporation August 1, 2024 Compliance Filing in
Docket No. G-999/CI-21-135

Request:

- A. State whether the utility called on its interruptible customers to curtail at any point during gas days January 11 through January 18, 2024;
- B. If the response to part A above is affirmative, state the following:
 - 1. The specific dates and times the curtailment order(s) was effective;
 - 2. For each curtailment order, the length of the curtailment order.
 - 3. For each curtailment order, the number of interruptible customers asked to curtail;
 - 4. For each curtailment order, the number of interruptible customers that complied with the curtailment order; and
 - 5. For each curtailment order, the approximate amount of avoided purchases of daily spot gas due to the curtailment order provided in both Dekatherms and dollar amounts.
- C. If the response to part B above is negative, explain why it was prudent for the utility to not call a curtailment order in light of the facts known at the time during the period of January 11 through January 18, 2024.

MERC Response:

- A. MERC did not call on its interruptible customers to curtail at any point during gas days January 11 through January 18, 2024.

Response by: Joshua Fieber
Title: Manager Gas Supply
Department: Gas Supply
Telephone: 920-433-1805
Email: Joshua.fieber@wecenergygroup.com

B. Not Applicable

- C. Due to the holiday weekend, forecasting for gas days January 13 - January 16 needed to occur on Friday, January 12, as the natural gas market was trading for the holiday and the Supply Call contracts required notification of execution by 8:15 a.m. on January 12. The forecast showed that MERC had a need to purchase additional gas to meet customer requirements and sufficient supply reserve margin to manage forecast changes for the 4 day holiday weekend. As the table below shows, the 4,400 Dth/day of Supply Call gas was needed for each day of the January 13-16 period.

MERC Consolidated	Saturday	Sunday	Monday	Tuesday
	1/13/2024	1/14/2024	1/15/2024	1/16/2024
Daily Forecast (Dth)	75,943	77,481	77,481	77,481
Reserve Margin (Dth)	4,236	2,860	1,941	946
Reserve Margin (%)	6%	4%	3%	1%

While participation in the daily gas price market is avoided as much as possible, reliability is MERC's number one obligation and priority. Although price was a consideration in MERC's final decision to purchase in the daily market, MERC's market information at the time of making the decision at 8:15 a.m. was that the Emerson hub was trading in the \$4-\$7 range, which was in line with historical pricing. MERC was surprised with the ultimate index price being as high as it was, which was the highest index price for that supply hub in approximately 10 years.

At the time that purchasing decisions were being made, there was no indication of supply disruptions impacting deliveries of supply, which would be a cause for calling a curtailment of interruptible customers (i.e. if supply disruptions were anticipated). When considering the price of gas as a cause for a curtailment order (i.e. an economic curtailment), at the time MERC was making its purchase decisions, the indications of gas prices were well under what the published index price ended up being and well below the price point where an economic curtailment would have been reasonable. Given those two factors, it was prudent to not call a curtailment.

Response by: Joshua Fieber
Title: Manager Gas Supply
Department: Gas Supply
Telephone: 920-433-1805
Email: Joshua.fieber@wecenergygroup.com



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G011/CI-21-611

Requested From: Joylyn Hoffman-Maleug, MERC

Type of Inquiry: General

☐ Nonpublic ☒ Public

Date of Request: 11/1/2024

Response Due: 11/12/2024

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): John Kundert

Email Address(es): john.kundert@state.mn.us

Phone Number(s): 651-539-1740

ADDITIONAL INSTRUCTIONS:

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Request Number:	88
Topic:	Gas Costs associated with daily contracts resulting from January 2024 pricing event on MERC's CON PGA service area
Reference(s):	January 26 Compliance Filing, page 2

Request:

How is MERC planning on recovering the costs of the daily contracts it identified in its January 26, 2024 Compliance filing?

MERC Response:

Please see MERC's August 30, 2024 filing for Consolidated's 2023-2024 Annual Automatic Adjustment ("AAA") Report in Docket No. G999/AA-24-138. As provided in the January 26, 2024 filing made by MERC, the Company incurred \$285,832 in daily spot market gas costs on the CON PGA system during January 13 – 16, 2024. MERC has included the \$285,832 in the 2023-2024 AAA Report and did not treat it differently from other gas purchase costs. The \$285,832 daily spot market gas costs represent 1.6% of Total Purchased Gas Costs for the Consolidated PGA as shown in Schedule C & D of the 2023-2024 AAA Report filed by the Company on August 30, 2024 in Docket G999/AA-24-138.

To be completed by responder

Response Date: 11/12/2024

Response by: Joylyn Hoffman Malueg

Email Address: Joylyn.hoffmanmalueg@wecenergygroup.com

Phone Number: 414-221-4208

PUBLIC – TRADE SECRET DATA HAS BEEN EXCISED



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G011/CI-21-611

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Request Number:	86
Topic:	Winter Storm Uri Stress Test
Reference(s):	Docket No. G999/CI-23-117 CUB Integrated Resource Planning Proposal, filed October 24, 2023, at page 33.

Request:

In the filing listed, the Citizens Utilities Board recommended that the Gas Utilities stress test the resource portfolios performance and costs with, at a minimum, the following condition;

1. A winter storm screening: an analysis that tests portfolios during the conditions and gas prices similar to those experienced during Winter Storm Uri.
2. Please provide an analysis that tests the Company's January 2024 supply portfolio using the weather conditions and gas prices like those experienced during Winter Storm Uri.

MERC Response:

1. MERC ran three separate analyses that can be seen via the attached file "MERC_DOC IR 86-Attachment 1.xls". Here's a brief explanation of the scenarios:
 - a) Highest Price Scenario (from Storm Uri February 2021 event) – During Storm Uri, the highest indices occurred on February 17th. A comparison of the 2021 portfolio versus the January 2024 portfolio was performed using the February 17th prices and demand.
 - b) Coldest Day Scenario (from Storm Uri February 2021 event) – During Storm Uri, the coldest temps for MERC occurred on February 13th. A comparison of the 2021 portfolio versus the January 2024 portfolio was performed using the February 13th prices and demand.
 - c) 2024 Design Day Scenario – A comparison of the 2021 portfolio versus the January 2024 portfolio was performed using the 2024 Design Day demand and the highest Storm Uri prices.

To be completed by responder

Response Date: 11/12/2024

Response by: Joshua J Fieber

Email Address: Joshua.fieber@wecenergygroup.com

Phone Number: 920-433-1805

PUBLIC – TRADE SECRET DATA HAS BEEN EXCISED



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-
2. See the file attached "MERC_DOC IR 86-Attachment 1.xls" for details of the analysis. Row 38 of the attached file represents the decrease in costs related to the changes to the portfolio along with other actions taken since Storm Uri (see MERC's response to DOC IR 85 for explanation of significant actions taken). A summary to the three scenarios described above in 1) above are:
 - a. Highest Price Scenario – Decrease in costs of \$13,603,903.
 - b. Coldest Day Scenario – Decrease in costs of \$15,118,417.
 - c. 2024 Design Day Scenario – Decrease in costs of \$15,830,851.

The nonpublic version attachment "MERC_DOC IR 86 – Attachment 1.XLS" contains trade secret information that is not generally known to and not readily ascertainable by vendors or competitors of MERC, who could obtain economic value from its disclosure. MERC maintains this information as secret. Accordingly, this information qualifies as "Trade Secret Data" pursuant to Minnesota Statutes section 13.37, subdivision 1(b).

To be completed by responder

Response Date: 11/12/2024

Response by: Joshua J Fieber

Email Address: Joshua.fieber@wecenergygroup.com

Phone Number: 920-433-1805

PUBLIC DOCUMENT - TRADE SECRET DATA HAS BEEN EXCISED

Highest Price Scenario (from Uri) - 2/17/21

MERC NNG	Volume (Dth)	Wacog (\$/Dth)	Total Cost (\$)	Actual Sendout	Transport	Sales
	[TRADE SECRET BEGINS....]					
Storage WD						
Term Baseload (Front-of-Month Index)						
Physical Forward Start Option (Gas Daily Daily Index)						
Spot Purchase (Gas Daily Daily Index)						
Total						
	...TRADE SECRET ENDS]					

MERC Consolidated	Volume (Dth)	Wacog (\$/Dth)	Total Cost (\$)	Actual Sendout	Transport	Sales
	[TRADE SECRET BEGINS....]					
Storage WD						
Term Baseload (Front-of-Month Index)						
Physical Forward Start Option (Gas Daily Daily Index)						
Spot Purchase (Gas Daily Daily Index)						
Total						
...TRADE SECRET ENDS]						

2021 Price and Demand Forecast with 2024 Portfolio

MERC NNG	Volume (Dth)	Wacog (\$/Dth)	Total Cost (\$)	Actual Sendout	Transport	Sales
Storage WD	[TRADE SECRET BEGINS....]					
Front-of-Month Priced Supply (Baseload + Call)						
Physical Forward Start Option (Gas Daily Daily Index)						
Spot Purchase (Gas Daily Daily Index)						
Total	...TRADE SECRET ENDS]					

MERC Consolidated	Volume (Dth)	Wacog (\$/Dth)	Total Cost (\$)	Actual Sendout	Transport	Sales
Storage WD	TRADE SECRET BEGINS....					
Term Baseload (Front-of-Month Index)						
Physical Forward Start Option (Gas Daily Daily Index)						
Spot Purchase (Gas Daily Daily Index)						
Total						

[TRADE SECRET BEGINS....]
NNG Cost Difference
Cons Cost Difference
Total MERC Cost Difference
...TRADE SECRET ENDS]

Coldest Day Scenario (from Uri) - 2/13/21

MERC NNG	Volume (Dth)	Wacog (\$/Dth)	Total Cost (\$)	Actual Sendout	Transport	Sales
	[TRADE SECRET BEGINS....]					
Storage WD						
Term Baseload (Front-of-Month Index)						
Physical Forward Start Option (Gas Daily Daily Index)						
Spot Purchase (Gas Daily Daily Index)						
Total						
...TRADE SECRET ENDS]						

MERC Consolidated	Volume (Dth)	Wacog (\$/Dth)	Total Cost (\$)	Actual Sendout	Transport	Sales
Storage WD	[TRADE SECRET BEGINS....					
Term Baseload (Front-of-Month Index)						
Physical Forward Start Option (Gas Daily Daily Index)						
Spot Purchase (Gas Daily Daily Index)						
Total	...TRADE SECRET ENDS]					

2021 Price and Demand Forecast with 2024 Portfolio

MERC NNG		Volume (Dth)	Wacog (\$/Dth)	Total Cost (\$)	Actual Sendout	Transport	Sales + 5% Reserve
Storage WD		[TRADE SECRET BEGINS....]					
Front-of-Month Priced Supply (Baseload + Call)							
Physical Forward Start Option (Gas Daily Daily Index)							
Spot Purchase (Gas Daily Daily Index)							
Total		...TRADE SECRET ENDS]					

MERC Consolidated	Volume (Dth)	Wacog (\$/Dth)	Total Cost (\$)	Actual Sendout	Transport	Sales + 5% Reserve
[TRADE SECRET BEGINS....]						
Storage WD						
Term Baseload (Front-of-Month Index)						
Physical Forward Start Option (Gas Daily Daily Index)						
Spot Purchase (Gas Daily Daily Index)						
Total						

[TRADE SECRET BEGINS....]
NNG Cost Difference
Cons Cost Difference
Total MERC Cost Difference
...TRADE SECRET ENDS]

2024 Design Day with 2021 Portfolio and Highest Uri Price

MERC NNG	Volume (Dth)	Wacog (\$/Dth)	Total Cost (\$)	Actual Sendout	Transport	Sales
Storage WD	[TRADE SECRET BEGINS...]					
Term Baseload (Front-of-Month Index)						
Physical Forward Start Option (Gas Daily Daily Index)						
Spot Purchase (Gas Daily Daily Index)						
Total						
...TRADE SECRET ENDS]						

MERC Consolidated	Volume (Dth)	Wacog (\$/Dth)	Total Cost (\$)	Actual Sendout	Transport	Sales
[TRADE SECRET BEGINS...						
Storage WD						
Front-of-Month Priced Supply (Baseload + Call)						
Physical Forward Start Option (Gas Daily Daily Index)						
Spot Purchase (Gas Daily Daily Index)						
Total						
...TRADE SECRET ENDS]						

2024 Design Day Forecast with 2024 Portfolio and Highest Uri Prices

MERC NNG		Volume (Dth)	Wacog (\$/Dth)	Total Cost (\$)	Actual Sendout	Transport	Sales
Storage WD		[TRADE SECRET BEGINS....]					
Front-of-Month Priced Supply (Baseload + Call)							
Physical Forward Start Option (Gas Daily Daily Index)							
Spot Purchase (Gas Daily Daily Index)							
Total							
		...TRADE SECRET ENDS]					

MERC Consolidated	Volume (Dth)	Wacog (\$/Dth)	Total Cost (\$)	Actual Sendout	Transport	Sales
Storage WD	[TRADE SECRET BEGINS...]					
Front-of-Month Priced Supply (Baseload + Call)						
Physical Forward Start Option (Gas Daily Daily Index)						
Spot Purchase (Gas Daily Daily Index)						
Total						

[TRADE SECRET BEGINS....]
NNG Cost Difference
Cons Cost Difference
Total MERC Cost Difference
...TRADE SECRET ENDS]



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G011/CI-21-611

Requested From: Joylyn Hoffman-Maleug, MERC

Type of Inquiry: General

☐ Nonpublic ☒ Public

Date of Request: 11/1/2024

Response Due: 11/12/2024

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): John Kundert

Email Address(es): john.kundert@state.mn.us

Phone Number(s): 651-539-1740

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 87

Topic: Extraordinary Gas Cost Recovery

Reference(s): *In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions*, Docket No. G011/CI-21-611, Order Adopting Settlement Agreement (Oct. 19, 2022) Order Point 5. Docket No. G999/AA-24-138, MERC Initial Filing, submitted August 30, 2024.

Request:

1. Order Point 5 states: MERC must incorporate any remaining true-up into its next annual automatic AAA.
 - a. Does the \$809,818 identified as the SWCR under-recovery roll-in the remaining true-up from the Company's efforts to recover the Extraordinary Gas Costs the Commission approved for MERC that were the result of the price spike caused by Winter Storm Uri?

MERC Response:

Yes, \$809,818 is the under-recovered February 2021 Storm Uri Extraordinary Gas Costs at the end of the 27-month recovery period, which ended November 30, 2023. The \$809,818 under-recovery represents 1.3% of the total February 2021 Storm Uri Extraordinary Gas Costs of \$61,975,882.¹

Please see MERC's August 30, 2024 filing for NNG's 2023-2024 Annual Automatic Adjustment Report in Docket No. G999/AA-24-138.

In Docket No. G999/CI-21-135, the Commission ordered that "[a]ny remaining true-up be addressed in MERC's next annual AAA report filed after the end of the extraordinary costs' recovery period." Given that MERC's extraordinary gas cost recovery period ended November 30, 2023, and consistent with the Commission's decision, MERC incorporated

¹ Total February 13-17, 2021 Extraordinary Gas Costs for MERC were \$64,975,882, but via the Commission-approved Settlement Agreement, the Company agreed to reduce Extraordinary Gas Costs by \$3,000,000 to \$61,975,882.

To be completed by responder

Response Date: 11/12/2024

Response by: Joylyn Hoffman Malueg

Email Address: Joylyn.hoffmanmalueg@wecenergygroup.com

Phone Number: 414-221-4208



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G011/CI-21-611

Requested From: Joylyn Hoffman-Maleug, MERC

Type of Inquiry: General

☐ Nonpublic ☒ Public

Date of Request: 11/1/2024

Response Due: 11/12/2024

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): John Kundert

Email Address(es): john.kundert@state.mn.us

Phone Number(s): 651-539-1740

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

the under-recovered balance of \$809,818 in the Annual Automatic Adjustment true-up filed on August 30, 2024, in Docket No. G011/AA-24-138.

To be completed by responder

Response Date: 11/12/2024

Response by: Joylyn Hoffman Malueg

Email Address: Joylyn.hoffmanmalueg@wecenergygroup.com

Phone Number: 414-221-4208

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
Public Comments**

Docket No. G999/CI-21-135 and G011/CI-21-611

Dated this 3rd day of **December 2024**

/s/Sharon Ferguson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP		50 S 6th St Ste 1500 Minneapolis MN, 55402-1498 United States	Electronic Service		No	21-135Official Service List
2	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-135Official Service List
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6	Mike	Boughner	michael.l.boughner@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	21-135Official Service List
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8	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	21-135Official Service List
9	Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
10	Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-135Official Service List
11	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	21-135Official Service List
12	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	21-135Official Service List
13	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	21-135Official Service List

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28	Alan	Jenkins	aj@jenkinsattlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	21-135Official Service List
29	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
30	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
31	Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
32	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-135Official Service List
33	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	21-135Official Service List
34	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	21-135Official Service List
35	Amy	Liberkowsky	amy.a.liberkowsky@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	21-135Official Service List
36	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	21-135Official Service List
37	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
38	Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	21-135Official Service List
39	Sarah	Mead	sarah.mead@wecenergygroup.com	MERC		null null, null United States	Electronic Service		No	21-135Official Service List
40	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General -	Bremer Tower, Suite 1400	Electronic Service		No	21-135Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
					Residential Utilities Division	445 Minnesota Street St Paul MN, 55101-2131 United States				Service List
41	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	21-135Official Service List
42	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	21-135Official Service List
43	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
44	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
45	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	21-135Official Service List
46	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	21-135Official Service List
47	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-135Official Service List
48	Lisa	Peterson	lisa.r.peterson@xcelenergy.com			414 Nicollet Mall FL 7 Minneapolis MN, 55401 United States	Electronic Service		No	21-135Official Service List
49	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	21-135Official Service List
50	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	21-135Official Service List
51	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	21-135Official Service List
52	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
53	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney	Suite 1400 445	Electronic Service		No	21-135Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
					General - Residential Utilities Division	Minnesota Street St. Paul MN, 55101-2131 United States				Service List
54	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States	Electronic Service		No	21-135Official Service List
55	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	21-135Official Service List
56	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	21-135Official Service List
57	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	21-135Official Service List
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59	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
60	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	21-135Official Service List
61	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
62	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
63	Kent	Sulem	ksulem@mmua.org			3131 Fernbrook Ln N Ste 200 Plymouth MN, 55447-5337 United States	Electronic Service		No	21-135Official Service List
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65	Casey	Whelan	cwhelan@kinectenergy.com	Kinect Energy Group		605 Highway 169 N Ste 1200 Plymouth MN, 55441 United States	Electronic Service		No	21-135Official Service List

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67	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	21-135Official Service List
68	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List

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4	Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		Yes	21-611Official Service List
5	Jocelyn	Bremer	jocelyn.bremer@minneapolismn.gov	City of Minneapolis		350 S Fifth St Ste 210 Minneapolis MN, 55415 United States	Electronic Service		No	21-611Official Service List
6	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	21-611Official Service List
7	Barbara	Case	barbara.case@state.mn.us		Office of Administrative Hearings	600 N. Robert St. St. Paul MN, 55101 United States	Electronic Service		No	21-611Official Service List
8	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	21-611Official Service List
9	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	21-611Official Service List
10	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	21-611Official Service List
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#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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14	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 United States	Electronic Service		Yes	21-611Official Service List
15	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	21-611Official Service List
16	Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		Yes	21-611Official Service List
17	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	21-611Official Service List
18	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	21-611Official Service List
19	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	21-611Official Service List
20	David	Moeller	dmoeller@allte.com	Minnesota Power			Electronic Service		No	21-611Official Service List
21	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-611Official Service List
22	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351	Electronic Service		No	21-611Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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34	Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine		225 S 6th St Ste 3500 Capella Tower Minneapolis MN, 55402-4629 United States	Electronic Service		No	21-611Official Service List
35	Michael A.	Yuffee	michael.yuffee@bakerbotts.com	Baker Botts		700 K St NW Washington DC, 20001 United States	Electronic Service		Yes	21-611Official Service List