MINNESOTA DEPARTMENT OF COMMERCE

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November 10, 2016

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Response Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G004/M-16-557

Dear Mr. Wolf:

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

> Demand Entitlement Filing (*Petition*) submitted by Great Plains Natural Gas Co., a Division of MDU Resources Group, Inc. (Great Plains or the Company), to the Minnesota Public Utilities Commission (Commission).

The *Reply Comments* were submitted on October 31, 2016 by:

> Tamie A. Aberle
> Director of Regulatory Affairs
> Great Plains Natural Gas Co., A Division of MDU Resources Group, Inc.
> 400 North 4th Street
> Bismarck, North Dakota 58501-4092

In its August 31, 2016 *Comments*, the Department requested that Great Plains provide additional information in *Reply Comments* and the November 1st update. Upon review of the additional information provided by Great Plains, the Department recommends that the Commission **accept** the Company's proposed level of demand entitlement and allow Xcel to recover associated demand costs through the monthly Purchased Gas Adjustment (PGA) effective November 1, 2016.

The Department is available to answer any questions that the Commission may have in this matter.

Sincerely,

/s/ MICHAEL RYAN
Rates Analyst

/s/ SACHIN SHAH
Rates Analyst

MR/SS/ja
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

RESPONSE COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET NO. G004/M-16-557

I. BACKGROUND SUMMARY

Pursuant to Minnesota Rules part 7825.2910, subpart 2, Great Plains Natural Gas Co., a Division of MDU Resources Group, Inc. (Great Plains or the Company), filed a petition on June 30, 2016 with the Minnesota Public Utilities Commission (Commission) to change the levels of demand for the Company's South District and North District (*Petition*).[1] Of note, the Commission's Order issued September 6, 2016 in Docket No. G004/GR-15-879 approved Great Plains' request to implement a consolidated base cost of gas and purchased gas adjustment (PGA) beginning July 1, 2017 and implement the process of consolidation during the two years following the implementation of the general rate increase.

On August 31, 2016, the Minnesota Department of Commerce, Division of Energy Resources (Department or DOC) filed *Comments* requesting that the Company provide *Reply Comments* on the following:

- further detail from the Company regarding the reasonableness of the 10-year TFX contract for the South District;
- reconciliation and explanation for all the historical data discrepancies between the Company's 2015 Petition and the instant *Petition*; and
- detailed explanation of how the Company manages its non-heating season capacity.

On September 23, 2016, the Company responded to the Department's request in *Reply Comments*. The Company also filed an *Information Update Filing* on October 31, 2016 to provide the final level of pipeline capacity actually purchased for the upcoming winter. Due

[1] Great Plains' South District includes the following Minnesota communities: Belleview, Boyd, Clarkfield, Danube, Dawson, Echo, Granite Falls, Marshall, Montevideo, Redwood Falls, Renville, Sacred Heart, and Wood Lake. Great Plains' North District includes the following Minnesota communities: Breckenridge, Crookston, Fergus Falls, Pelican Rapids, and Vergas.

to the nature of the natural gas heating season being the five-month period beginning November and going through March, the Company has the ability to secure capacity up until November 1st each year. The demand entitlement levels reported in the original *Petition* were proposed as of June and were not the final level of pipeline capacity actually purchased. Therefore the update was required.

In Section II below, the Department's analysis of the *Petition*, *Reply Comments* and *Information Update Filing* for the South District and the North District includes the following areas:

- the proposed overall demand entitlement levels;
- the design-day requirements;
- the reserve margins; and
- the PGA cost recovery proposals.

II. THE DEPARTMENT'S ANALYSIS OF GREAT PLAINS' PROPOSAL

A. PROPOSED OVERALL DEMAND ENTITLEMENT LEVELS

1. South District

For the South District, Great Plains stated in the original *Petition* that Northern Natural Gas' (NNG or Northern) reallocation of TF-12B and TF-12V services were not known at the time and that the changes would be updated once NNG notified the Company. Effective November 1, 2016, the Company was informed that TF-12B would be increasing by 817 Dekatherms (Dk or Dth) and TF-12V would be decreasing by 817 Dk. The adjustment is in accordance with NNG's tariff approved by the Federal Energy Regulatory Commission (FERC).[2] According to Great Plains in prior demand entitlement dockets, there is no deliverability difference between TF-12B and TF-12V services, but TF-12B service is less expensive than TF-12V service.

Also, the Company reported that the South District entitlement will increase by 300 Dk for November through March. The increase is due to Great Plains being unable to release the full 1,300 Dk originally planned for the heating season. The Company stated that it was only able to find a buyer for 1,000 Dk. Great Plains also stated that it will continue to search for a market to release the excess 300 Dk for December 1, 2016 through March 31, 2017.

Table 1 below provides a comparison of the Company's current and proposed overall level of entitlements for the South District.

[2] Under its federally approved tariff, NNG is allowed to adjust a utility's assigned level of contracted capacity, based on the utility's usage of its NNG-based capacity over the previous five-month period (May through September).

Table 1: A Comparison of Great Plains' Current and Proposed Entitlements for the South District

Current Entitlement (dk/day)	Proposed Entitlement (dk/day)	Change (dk/day)	Percent Change
17,845	18,145	300	1.68%

As indicated in Table 1, the Company's proposal would result in a slight increase of 1.68% to the overall demand entitlement level for the South District compared to the current entitlement level. Great Plains estimated a small increase in demand charges to South District residential customers of approximately $0.0017 per dk, or 0.1 percent, from the May 2016 PGA.[3]

Please note that the current and proposed entitlements above include capacity release. The Company's long-term entitlement is 19,145 Dk/day for the South District beyond the upcoming 2016-2017 heating season without the 1,000 Dk/day capacity release option.

As discussed in Docket No. G004/M-15-645, Great Plains entered into a 10-year TFX annual contract with NNG for 2,000 Dk/day effective November 1, 2015. In its *Reply Comments*, to the Department's August 31, 2016 *Response Comments* in Docket No. G004/M-15-645 (Docket 15-645) Great Plains attempted to address its new TFX 12-month 2,000 Dth/day annual 10-year contract. The Department addressed the issue of Great Plains new TFX 12-month 2,000 Dth/day annual 10-year contract identified in Docket 15-645 through *Supplemental Response Comments* filed in Docket 15-645. To summarize, the Department concluded that the new 2,000 Dth/day of NNG's TFX capacity may be reasonable since:

- There is no valid alternative such as a propane-air peak shaving facility;
- Great Plains' peak-day send out has been increasing over the last three heating seasons;
- Future weather cannot be forecasted accurately and with precision;
- NNG is fully subscribed and will not sell capacity in a "just-in-time" fashion; rather, capacity must be added in larger "chunks;"
- Great Plains must plan for its design day; and
- Consolidation of the Company's PGA districts could result in changes to Great Plains' current and future capacity arrangements.

2. *North District*

Table 2 below provides a comparison of the Company's current and proposed overall level of entitlements for the North District.

[3] Typically, the most recent PGA prior to the *Petition* is used. In this case there was no change to South District PGA in June 2016, so the May 2016 value was extended to the month of June.

Table 2: A Comparison of Great Plains' Current and Proposed Entitlements for the North District

Current Entitlement (dk/day)	Proposed Entitlement (dk/day)	Change (dk/day)	Percent Change
15,700	16,400	700	4.46%

As indicated in Table 2, the Company's proposal would result in an increase in the overall demand entitlement level for the North District compared to the current entitlement level. Great Plains estimated a slight decrease in demand charges to North District customers of approximately $0.0143 per dk, or 0.9 percent, from the June 2016 PGA.

The Department requested that the Company provide information on how it manages non-heating season capacity. Great Plains responded in the September 23, 2016 *Reply Comments* as follows:[4]

> Great Plains is able to meet its non-heating season capacity by obtaining gas in the day market to meet the peak day demand on a day-by-day basis should the need arise.
>
> The Viking system has adequate backhaul transportation capacity available from the Chisago interconnect with Northern Natural to allow daily flow from this point. Great Plains has firm capacity on Northern's system to ensure the gas will flow on a firm contract to the Chisago interconnect. In response to the Department's observation on page 2 of its Response Comments, Great Plains could seek additional capacity through the release capacity market; however, the Company would then be paying for this additional capacity every day regardless if the capacity is needed or not. By using the backhaul capacity that is available in the day market Great Plains only pays for this capacity on the day(s) it is required. Although unlikely, exceeding contracted capacity would be concentrated in the months of April and October and Great Plains has not acquired additional capacity to meet firm customers' demand during the past five years.

Finally, as noted above, the two PGA districts will be combined effective July 1, 2017.[5] The Company stated in *Reply Comments* that no non-heating season capacity shortfall exists under the Company's current capacity arrangements once the PGA districts are combined.

[4] Great Plains September 23, 2016 *Reply Comments* at pages 4-5.
[5] Docket No. G004/GR-15-879, Commission's Order dated September 6, 2016

The Department agrees that Great Plains can meet its non-heating season capacity by obtaining gas in the day market on a day-by-day basis, if the need arises. The Department appreciates Great Plains' clarification that it could use "the backhaul capacity that is available in the day market and that Great Plains only pays for this capacity on the day(s) it is required." Thus, Great Plains' clarification and explanation above for how it manages its non-heating season capacity are reasonable.

The Department analyzes below the proposed changes, the proposed design-day requirements, and the proposed reserve margins for the South District and the North District.

B. DESIGN-DAY REQUIREMENTS

The Department offers below additional discussion on the Company's design-day requirements in response to the Company's *Reply Comments* and the reconciliation and explanations the Company provided on the historical data differences.

1. Historical Data Differences

In its August 31, 2016 *Comments*, the Department stated the following:[6]:

> While reviewing the data for the Company's design-day analysis, the Department noticed differences in the historical data that was used by the Company in its regression models. The Company did mention that there were differences in the data in its email correspondence, included as DOC Attachment 1. The Company stated the following:
>
> > .. I would like to point out that the volumes and customers used in this file do have slight differences than the data used in the prior year's file from February 2015 and forward. The reason is tied to the new billing system that was implemented that same month. There were some data issues (clean up from transition to the new system, data location, etc.) that took a bit of time to work through. Other than that I think you will find the data to be very similar to what has been provided in the past.
>
> However, the data differences cannot be characterized as "slight differences."

[6] See the Department's August 31, 2016 Comments in Docket No. G004/M-16-557, at pages 4-5.

Please see Tables 3 and 4 in the Department's August 31, 2016 *Comments*[7] that illustrate the discrepancies for the month of March 2015 as an example. However, the Department noted more than just customer numbers and volume discrepancies, as quoted below:

> In addition to discrepancies in the billing data from February 2015 forward, the actual historical billing period weather data has changed between Great Plains' 2015 Petition and the current *Petition*. For example, for Wahpeton in May 2013, the Company's 2015 Petition shows 106 degree days whereas data in the instant docket indicates 551.99 degree days. The Company attributed the "slight differences" mentioned above to "the implementation of the new billing system." The Department observes that last year's filing (2015 Petition) was filed by Great Plains on July 1, 2015, after the "new billing system" had already been implemented. Thus, it's unclear why there are differences in historical data between the instant docket and the 2015 Petition. The Department requests that Great Plains clarify and explain all the historical data differences between the 2015 Petition and the 2016 *Petition*. DOC Attachment 2 consists of a copy of the Department's Information Request No. 1, which highlights the data discrepancies in question. As a result, the Department will offer its analyses and recommendations on Great Plains design day in the Department's subsequent Response Comments.

In the Company's September 23, 2016 *Reply Comments*, Great Plains stated the following:[8]

> In its Response Comments submitted in Docket No. G004/M-16-557, the Department requested that Great Plains address the reconciliation and explanation for all the historical data discrepancies between the Company's 2015 Petition (Docket No. G004/M-15-645) and the Company's 2016 Petition (Docket No. G004/M-16-557). Since the Department filed its Comments, Great Plains addressed the noted data discrepancies in response to an Information Request provided to the Department on September 8, 2016. A copy of the Company's response to the Information Request is included as Attachment C.
>
> As noted in the Company's attached Response, there were differences in the data provided in Docket Nos. M-15-645 and M-16-557; however, the overall results using the most recent

[7] Id at pages 5-6.
[8] See Great Plains September 23rd, 2016 *Reply Comments* at page 4.

> data produced similar results in Docket No. M-15-645 and there are no changes to any information provided in Docket No. M-16-557. Overall, each District had sufficient capacity to serve all firm customers during the 2015-2016 heating season and the reserve margin was very close to the Commission recommended reserve margin of 5 percent.

In its response to DOC Information Request No. 1, (attached to Great Plains' September 23, 2016 *Reply Comments* as Attachment C), the Company further stated the following:

> … During the period between the filing Docket Nos. 15-645 and 16-557, the Company implemented a change in the analysis of customer usage from a billing period basis to a calendar month basis. The Company has determined there is a better correlation between customer consumption and degree days under this method. The change was made possible due to the implementation of Great Plains' new customer information system and the detail of the information available.
>
> The difference in decatherms in the shoulder month of March 2015 as noted above does appear to be significant but on an annual basis will produce similar results. Again, this is related to a shift from billing period to calendar month. The degree days for Wahpeton in May 2013 was an error in Docket No. 15-645 and was corrected in this Docket.
>
> Because the differences between the two Dockets previously mentioned are primarily the result of a change of the base data used in the regression analysis, a meaningful reconciliation cannot be performed as the data has a different basis. Please see the attached Excel file titled Response No. 1 Attachment A. The file includes customer counts, billed Dth and weather data. There are three sections: information included in Docket No. M 16-557, information included in Docket No. M-15-645 and the variance between the two submissions.

The Department makes the following observations below with regards to the historical data differences between the *2015 Petition* in Docket No. 15-645 and the current *Petition*.

(a) 2015 Petition Peak Day Analysis in Docket No. 15-645.

Given that the Company has implemented a change in the basis of the data used in the peak-day analysis, the Department makes the following observations:

- The Company went from using billing month data to calendar month data, as a result of its new billing system;
- the Company cannot perform a reconciliation as it stated above;
- the Company used the newer data and re-evaluated its 2015 peak day analysis and obtained overall results that produced similar results in Docket No. M-15-645;
- the initial projected design-day was 32,267 Dth, which changed to 32,008 Dth with the use of the calendar month data;
- the 2015-2016 heating season is over; and
- the Department appreciates Great Plains correction of the historical weather data for Wahpeton.

As a result of all of the above observations, the Department recommended acceptance of the Company's peak-day analysis in Docket No. 15-645. On a going-forward basis, the Department expects that the data that the Company will use will be consistent (i.e., the consumption data will reflect calendar month data) once the Company has accumulated a minimum 36 months' worth of data under the new billing system.

Thus, the Department evaluates below the Company's peak-day analysis based on the Company's calendar and billing month data submitted in Docket No. 16-557.

(b) 2016 Petition Peak-Day Analysis in Docket No. 16-557.

The Company used the same basic design-day method in this docket that the Commission has previously accepted.[9] In addition, Great Plains' regression models [Crookston and North 4 rate 60 (residential)] had autocorrelation present in the regression analysis. The presence of autocorrelation in an Ordinary Least Squares (OLS) regression analysis implies that the errors are not independent of each other. This would violate one of the basic assumptions in typical regression analysis which is that one normally assumes that the errors are all independent of one another. Hence, the presence of autocorrelation would affect the validity of the statistical tests that are typically applicable to OLS regression analysis such as, for example, the coefficient of determination ("R-squared") test statistic, and the t-statistic. When forecasting with an OLS regression model, absence of autocorrelation between the errors is very important. Thus, the Department requests that in its future demand entitlement filings, Great Plains check the regression models it ultimately uses for autocorrelation and correct the models if autocorrelation is present.

Consistent with prior analyses presented by the DOC in Docket Nos. G004/M-11-1075, G004/M-12-740, and G011/M-13-566, the Department used two methods to gauge the reasonableness of the Company's design-day amounts for the South District and the North District: 1) using data from the previous five heating seasons; and 2) using data from the

[9] See the Department's August 31, 2016 *Comments* in the instant docket at pages 4-5 and the August 27, 2015 *Comments* in Docket No. 15-645 at pages 4-7.

heating season with the overall greatest peak sendout per firm customer that occurred before the previous five heating seasons.[10]

2. South District

For the South District, the Department multiplied the peak sendout per firm customer for the 2015-2016 heating season of 1.2943 Dth, which is the highest peak sendout per firm customer in the previous five heating seasons, by the expected number of firm customers for the 2016-2017 heating season of 11,959 to arrive at an estimated design-day amount of 15,479 Dth/day. This amount is 1,363 Dth/day less than the Company's proposed design-day level of 16,842 Dth/day.

Thus, using the method based on the highest firm peak sendout data for the previous five heating seasons, Great Plains appears to have a sufficient level of entitlements for the 2016-2017 heating season for the South District.

The Department also calculated an estimated design-day amount using data from the 1995-1996 heating season, which represents the highest peak sendout per firm customer in the South District in the previous 20 heating seasons. Specifically, the Department multiplied the peak sendout per firm customer for the 1995-1996 heating season of 1.5331 dk by the expected number of firm customers for the 2016-2017 heating season of 11,959 to arrive at an estimated design-day amount of 18,334 dk. This amount is 1,492 Dth more than the Company's proposed design-day level of 16,842 Dth/day. The Department addresses this situation further in Section II.B.3 below.

3. North District

For the North District, the Department multiplied the peak sendout per firm customer for the 2014-2015 heating season of 1.1871 dk, which is the highest peak sendout per firm customer in the previous five heating seasons, by the expected number of firm customers for the 2016-2017 heating season of 11,854 to arrive at an estimated design-day amount of 14,072 Dth. This amount is 1,484 Dth less than the Company's proposed design-day level of 15,556 Dth/day. Thus, using the method based on the highest firm peak sendout data for the previous five heating seasons, Great Plains appears to have sufficient level of entitlements for the 2016-2017 heating season for the North District.

As was done for the South District, the Department also used data from the 1999-2000 heating season, which represents the highest peak sendout per firm customer in the North District in the previous 20 heating seasons. Specifically, the Department multiplied the peak sendout per firm customer for the 1999-2000 heating season of 1.6321 Dth by the expected number of firm customers for the 2016-2017 heating season of 11,854 to arrive at an estimated design-day amount of 19,347 Dth. This amount is 3,791 Dth more than the Company's proposed design-day level of 15,556 Dth/day.

[10] The data used by the Department is taken from Exhibit D of the Company's *Petition*.

4. Reasonableness of Great Plains' Design-Day Analyses

As noted above, when the all-time peak-day sendout is analyzed, it appears that Great Plains may not have sufficient capacity to serve firm customers, for each of its districts, on a Commission design-day. However, in its 2010 demand entitlement proceeding, Great Plains stated that the peak-day use-per-customer figures during past heating seasons are no longer appropriate metrics because of the many changes (*e.g.,* the movement of firm customers to interruptible service, customer losses due to natural disasters, customer growth and losses, energy conservation) that have occurred since 1995, resulting in a steadily declining use per customer. In that same proceeding, the Department observed that, in general, Great Plains' assertions about changes in use per customer over time appear to be plausible and should be reflected in estimates of use per customer.

The extreme weather in the 2013-2014 heating season offers further insight into reliance on the all-time versus the 5-year peak-day sendout to evaluate the Company's design-day estimate. Great Plains experienced an outage in January 2014 when the TransCanada pipeline, which supplied gas to the Viking Gas Transmission Company that serves Great Plains' customers in the North District, exploded. Further, Great Plains experienced some extremely cold weather during the months of January through March 2014.[11] Despite these challenges, the peak sendout of 13,236 Dth was below Great Plains' estimated design-day of 14,140 Dth and the Company appears to have had sufficient levels of entitlements.

In addition, Great Plains had an even greater peak sendout of 13,868 Dth in the 2014-2015 heating season, which was also below Great Plains' estimated design-day of 14,812 Dth. Once again, the Company appeared to have had sufficient levels of entitlements.

As noted above, the Commission in its January 9, 2014 *Order* in Docket No. G004/M-13-566, accepted the Company's proposed design-day method for the South and North District, as recommended by the Department.

The Department recommends that the Commission accept the Company's same proposed design-day method for the South District and the North District.

C. PROPOSED RESERVE MARGINS

In the Company's 2007, 2008, and 2009 demand entitlement proceedings, the Commission stated the following:

> Great Plains shall reduce its reserve margin in Docket No. G-004/M-09-1262 to approximately five percent or explain why it is not reasonable to do so.[12]

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[11] See pages 3 through 5 of the Company's August 29, 2014 Filing in Docket No. E,G999/AA-14-580.
[12] *See* Ordering Paragraph No. 4 of the Commission's September 30, 2010 *Order* in Docket Nos. G004/M-07-1401, G004/M-08-1306, and G004/M-09-1262.

Table 5 below compares Great Plains' authorized and proposed reserve margins for the South District and the North District.

Table 5: Great Plains' Authorized Reserve Margins for the 2014-2015 Heating Season and Proposed Reserve Margins for the 2015-2016 Heating Season

District	2014-2015 Reserve Margin[13]	Proposed Reserve Margin	Proposed Reserve Margin without Capacity Release
South	5.9%	7.7%	13.7%
North	1.9%	5.4%	5.4%
Total	**4.0%**	**6.6%**	**9.7%**

The increases to the proposed reserve margin for both districts are driven by entitlement increases.

1. *South District*

As indicated in Section II.A above, Great Plains was unable to release the full 1,300 Dk/day originally proposed in June and conducted during the 2014-2015 heating season for the South District. If the Company is able to release an additional 300 Dk between December 1, 2016 and March 31, 2017, it will drop the reserve margin to 6.0%.

Without the capacity release, the Company's winter entitlement is 19,145 Dk/day resulting in a reserve margin of 13.7%. The Company indicated that it will also attempt to release an additional 300 Dk if possible between December 1, 2016 and March 31, 2017.

2. *North District*

The proposed reserve margin increase for the North District was driven by the ability of the Company to contract for seasonal contracts to get the reserve margin above 5%. In the 2014-2015 season, Great Plains had planned to obtain a reserve margin between 5-6%, but was unable to procure enough winter capacity.

As noted above the proposed reserve margin for both districts are driven by entitlement increases. The South District is most heavily impacted by the additional 2,000 Dth/day NNG contract added beginning November 1, 2015. In Docket 15-645 the Department provided detailed evaluation and a mixed justification for the procurement of this new contract, but ultimately concluded that the contract is not unreasonable. Based on this understanding, the Department recommends that the Commission approve the reserve margins.

[13] Great Plains *Update*, October 29, 2015, Docket No. G004/M-15-645

D. THE COMPANY'S PGA COST RECOVERY PROPOSAL

The demand entitlement amounts listed above and in the Company's *Petition* represent the demand entitlements for which Great Plains' firm customers would pay. In its *Petition*, the Company used its May 2016 PGA to compare its proposed changes for its South District and June 2016 for its North District.[14] Great Plains presented an analysis indicating that the Company's demand entitlement proposal would result in the following estimated annual rate impacts for customers in the South District:

- an annual bill increase of $0.15 or approximately 0.1 percent, for the average residential customer consuming 88.2 dk annually; and
- an annual bill increase of $0.60 or approximately 0.1 percent, for the average firm general service customer consuming 340.9 dk annually.

Great Plains also presented an analysis indicating that the Company's demand entitlement proposal would result in the following estimated annual rate impacts for customers in the North District:

- an annual bill decrease of $1.48 or approximately 0.9 percent, for the average residential customer consuming 103.8 dk annually; and
- an annual bill decrease of $5.37, or approximately 0.9 percent, for the average firm general service customer consuming 375.7 dk annually.

III. THE DEPARTMENT'S RECOMMENDATIONS

In the instant *Petition,* Great Plains' analysis produces results that are acceptable for planning for the design-day. Therefore, the Department recommends that the Commission:

- accept the Company's proposed design-day method for the South District and the North District;

- require Great Plains, in its future demand entitlement filings, to check the regression models it ultimately uses for autocorrelation, and correct the models if autocorrelation is present; and

- approve Great Plains proposed level of demand entitlement and proposed recovery of associated demand costs effective November 1, 2016.

/ja

[14] *See* Exhibit C of the Company's *Update*, dated October 31, 2016.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Response Comments

Docket No. G004/M-16-557

Dated this 10th day of November 2016

/s/Sharon Ferguson

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