

September 2, 2025

Mike Bull
Acting Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce
Docket No. G011/M-25-69

Dear Mr. Seuffert:

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

*In the Matter of Minnesota Energy Resources Corp.'s Petition for Approval
of a Change in Demand Entitlement for its Consolidated System*

The Petition was filed by the Minnesota Energy Resources Corporation (MERC or the Company) on August 1, 2025.

The Department will provide its final recommendations to the Minnesota Public Utilities Commission (Commission) after the Company files its Reply Comments and its November 3, 2025 Update. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ Dr. Sydnie Lieb
Assistant Commissioner of Regulatory Analysis

SS/ad
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. G011/M-25-69

I. INTRODUCTION

The Minnesota Department of Commerce, Division of Energy Resources (Department) provides its initial comments on the Demand Entitlement Filing (Petition) of Minnesota Energy Resources Corporation (MERC or the Company) for its Consolidated System in Docket No. G011/M-24-269.¹ Pursuant to Minn. R. 7825.2910, subp. 2, MERC filed a petition to request changes in the levels of demand for natural gas pipeline capacity (Petition) for its customers served off the Consolidated Purchased Gas Adjustment (PGA) system (MERC-Consolidated) on August 1, 2025 with the Minnesota Public Utilities Commission (Commission or PUC). MERC-Consolidated serves customers located along three pipelines: Great Lakes Gas Transmission (Great Lakes or GLGT), Viking Gas Transmission Co. (Viking or VGT), and Centra Minnesota Pipelines (Centra). MERC requested that the Commission approve changes in the Company's recovery of the overall level of contracted capacity.

II. PROCEDURAL BACKGROUND

The Department outlines the relevant procedural history as follows.

February 4, 2015	The Commission issued its Order in Docket Nos. G011/M-12-1192, G011/M-12-1193, G011/M-12-1194, G011/M-12-1195, the Commission stated in part the following: "Required MERC to check its regression models for autocorrelation and correct the model if autocorrelation is present by removing the autocorrelation from the model." ²
February 17, 2023	The Commission issued its <i>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</i> . Ordering Paragraphs 9 and 10 stated the following: 9. In future contract demand entitlement filings, the gas utilities in this docket shall discuss how changes to their pipeline capacity affect their supply diversity and, if pipeline capacity comes at a cost premium but increases supply diversity,

¹ Minnesota Energy Resources Corporation, Petition, August 1, 2025, (eDockets) [20258-221696-01](#), (hereinafter "Petition").

² *In the Matter of a Petition by Minnesota Energy Resources Corporation (MERC-PNG Great Lakes Gas Transmission (GLGT), MERC – PNG Northern Natural Gas (NNG), MERC-PNG Viking, and MERC-NMU) for Approval of Changes in Contract Demand Entitlements for the 2012-2013 Heating Season Supply Plan effective November 1, 2012*, Order, February 4, 2015, Docket Nos. G 011/M-12-1192; G-011/M-12-1193; G-011/M-12-1194; G-011/M-12-1195, (eDockets) [20152-107016-04](#) at 2, (hereinafter "February 4, 2015 Order").

provide a meaningful cost/benefit discussion of the tradeoff, including a comparison with the least-cost capacity option.

10. Each gas utility in this docket shall include in its relevant annual, forward-looking gas planning or hedging filings:

- A. Its expected supply mixes across different load and weather conditions throughout each month of the upcoming winter season;
- B. The forecasted minimum, average, and maximum day load requirements; and
- C. The expected mix of baseload, storage and spot supply on those days.

August 1, 2025

The Company submits its Petition in the current proceeding, requesting a change to the Company's demand entitlements pursuant to Minn. R. 7829.2910, subp. 2.³

III. DEPARTMENT ANALYSIS

The Department provides an analysis for the Company's Petition that includes the following areas:

- Summary of proposed changes;
- Changes to Capacity and non-capacity items;
- The design-day requirements;
- The reserve margin;
- The PGA cost recovery proposal;
- Commission Orders in Docket No. G999/CI-21-135 and G011/CI-21-611; and
- ANR Pipeline (ANRP) Company's and GLGT's Rate Cases at Federal Energy Regulatory Commission (FERC).

A. SUMMARY OF PROPOSED CHANGES

MERC proposes to increase its total design-day requirement by 1,058 dekatherms (Dth) to 58,794 Dth/day. The Company currently has design day capacity of 64,429 Dth/day on its MERC-Consolidated system. In terms of capacity, MERC proposed to increase its current design-day deliverability of 64,429 Dth/day approved for the last heating season, by 235 Dth to 64,664 Dth/day for the 2025-2026 heating

³ [Minn. R. 7825.2910, subp. 2](#)

season. This increase results in an estimated reserve margin of approximately 9.98%. MERC also proposes changes to its non-design-day deliverable contracts such as storage contracts.⁴

MERC's proposed entitlement changes results in an estimated increase in demand costs for residential customers of \$0.0590 per Dth, 6.64 percent, or approximately \$5.09 per year compared to the rates included in the Company's July 2025 PGA.⁵

MERC also requests that the Commission allow recovery of the associated demand costs in the Company's monthly PGA effective November 1, 2025.⁶

B. CHANGES TO CAPACITY AND NON-CAPACITY ITEMS

B.1. Capacity Contracts

As an initial matter, the Department confirms that, as required by the Commission's Order Point 9⁷ of its April 28, 2016 Order that MERC provided separate data on its summer and winter demand entitlements.⁸

As noted in Table 1, and indicated in Department Attachment 1, the Company proposes changes to its overall entitlement level. MERC makes changes to its Centra pipeline amounts by acquiring additional capacity in the amount of 235 Dth/day. Based on its reserve margin analyses in Section III.D below, the Department concludes that MERC's proposed level of demand entitlement is appropriate and is likely sufficient to ensure firm reliability on a peak day.⁹

Table 1: MERC's Consolidated Total Entitlement Levels

Filing	Previous Entitlement (Dth)	Proposed Entitlement (Dth)	Entitlement Changes (Dth)	Change From Previous Year (%)
August 1, 2025	64,429	64,664	235	0.36 %

B.2. Changes to Non-Capacity Items

MERC notes that both of its ANR pipeline transportation service (ANRP) and its ANR Storage services (ANRS) contracts have been extended through March 31, 2028.¹⁰ The Company proposes to increase its storage from 1,003,600 Dth to 1,004,700 Dth, which is a change of 1,100 Dth, or 0.11 percent. The

⁴ Petition, Attachment C at 5-6.

⁵ Petition Attachment 4.

⁶ Petition, Attachment C at 1, and 8.

⁷ Order Point 9 states, "Required MERC to separate its summer and winter demand entitlements as reflected in Attachment 4 of its petitions, rather than combining the data as reflected on Attachment 3 of its petitions." April 28, 2016 Order at 2.

⁸ Petition Attachment 3.

⁹ *Id.* See also, Petition, Attachment C at 5.

¹⁰ *Id.* at 5-6.

Company noted that small changes to storage volumes and rates will occur each year as a result of annual fuel rate changes.¹¹

C. DESIGN-DAY REQUIREMENTS

The Company proposes to increase its total design-day in Dth as follows. Table 2 shows MERC's consolidated design-day levels.

Table 2: MERC-Consolidated Design-Day Levels

Filing	Previous Design Day (Dth)	Proposed Design Day (Dth)	Design Day Changes (Dth)	Change From Previous Year (%)
Centra	9,626	9,850	224	2.33%
Great Lakes	30,245	30,489	244	0.81%
Viking	17,865	18,455	590	3.30%
Total Consolidated	57,736	58,794	1,058	1.83%

MERC states the following:¹²

The Consolidated Design-Day requirement has increased by 1,058 dekatherms (dth) since November 1, 2024. This represents a 1.83% increase in Design-Day requirement over the 2024-2025 heating season.

For the Demand Entitlement filing effective November 1, 2025, the total Design-Day requirement for MERC Consolidated is 58,794 dth (Attachment 1). The difference between the total Design-Day requirement and total Design Day capacity results in a 9.98% reserve margin (Attachment 3).

MERC uses a similar approach to last year's filing for its design-day analysis. As a result of MERC's telemetry program, which makes it possible for all interruptible customers to have daily metered data, the Company no longer has to estimate interruptible customers' peak-day impact for the customers served on the MERC-Consolidated system.

MERC's 2025-2026 Design-Day Regression analysis utilizes daily telemetry data for all the MERC-Consolidated customers. MERC obtained the daily large volume transportation, interruptible and joint interruptible customer's volumes by pipeline and weather station (Data A). In addition MERC obtained the daily small volume interruptible customer's volumes by pipeline and weather station (Data B). MERC calculated the daily firm volumes by subtracting both Data A and Data B from the total throughput volumes.

¹¹ *Id.* See also, Petition Attachments 4, 7, and 8.

¹² Petition, Attachment C at 2-3.

In addition, MERC makes some adjustments to its data—for example the regression analysis for the MERC-Consolidated system. In its Petition MERC states the following:¹³

Review daily total metered throughput, Data A, and Data B and identify missing or bad reads, and to the extent possible, fix missing or bad reads. To the extent that the data could not be fixed, it was not included in the regressions.

In its Petition, MERC also states the following:¹⁴

Identify the coldest Adjusted Heating Degree Day (AHDD) since January 1996 for each weather station. Note, this is a change in practice from prior analysis that used a rolling 20-year period. The change was included because many weather stations experienced historically cold weather in the January/February 1996 time period and without inclusion of that additional data from January/February 1996, AHDD were materially lower and not reflective of MERC's capacity needs.

To the Department's knowledge, MERC's prior design-day analyses have relied on the coldest days from 1996. In any event, the Department agrees with MERC that it would not be acceptable to use a rolling 20-year weather period in the design-day calculations when planning for the Company's capacity needs in meeting the design-day. The 20-year weather period may not necessarily reflect the coldest days that need to be planned for.

MERC's design-day analysis, as described in the Petition¹⁵, is similar to what was used by the Company in recent demand entitlement filings. The Company's design-day analysis is based on Ordinary Least Squares (OLS) regression and daily heating season (i.e., December, January, February) data over the period from December 2022 to February 2025.

Since MERC's Consolidated PGA service area serves customers on three separate pipelines and separate parts of Minnesota, the Company conducted four separate regression models for the various parts of the Consolidated-PGA area. MERC used Adjusted Heating Degree Days (AHDD) and various other determinants (e.g., month, day of the week, holiday) to estimate daily heating season consumption for each weather station area. The Department reviewed each of MERC's design-day regression models, and concluded that the signs of the determinant coefficients are appropriate and reasonable.

During the 2018-2019 heating season, MERC's service area, and the entire state of Minnesota, experienced a cold weather outbreak in late January and early February. This cold weather event marked the coldest conditions since the 1995-1996 heating season, and the Company included

¹³ Petition, Attachment 12 at page 3.

¹⁴ *Ibid.*

¹⁵ Petition, Attachment 12.

information and a discussion regarding this event in its Petition.¹⁶ On an AHDD basis, the cold weather event during the 2018-2019 heating season was the coldest weather on record for some of MERC's Consolidated PGA system weather stations (Table 3).

Table 3: Coldest Weather Conditions

<u>Station</u>	<u>Date</u>	<u>Avg. Temp (F)</u>	<u>Avg. Wind Speed (mph)</u>	<u>HDD65</u>	<u>AHDD65</u>	<u>AHDD65- 1</u>
Bemidji*	1/29/2019	-32	14	97	110	84
Cloquet*	1/29/2019	-24	16	89	103	74
Fargo*	1/18/1996	-16	34	81	109	85
International Falls*	2/2/1996	-34	8	99	107	107
Minneapolis	1/29/2019	-20	17	85	100	71
Rochester	1/29/2019	-20	21	85	104	76
Worthington	1/29/2019	-20	21	85	103	81
Ortonville	1/29/2019	-23	14	88	101	77

* Consolidated PGA weather station.

In previous demand entitlement filings, the Company's planning objective was based on the coldest day, defined as the highest AHDD, for each of MERC's regional regression models. Beginning with the 2019 demand entitlement filing (covering the 2019-2020 heating season), the Company considered the day prior to the coldest day (AHDD65-1) when determining whether a specific date represents the planning objective for a weather station. MERC provides the following explanation in its Petition:¹⁷

While the January 2019 cold weather outbreak was significant, it was not considered to be as severe as the weather conditions experienced in 1996. With the exception of Worthington, the 1996 weather conditions overall were colder when considering both the current day and the prior day weather conditions.

As a result, the following planning objective data for the various weather stations were used in the Company's design-day analysis.

¹⁶ Petition, Attachment 12, at pages 4-5.

¹⁷ *Id.*

Table 4: MERC Planning Objective Data

<u>Station</u>	<u>Date</u>	<u>Avg. Temp (F)</u>	<u>Avg. Wind Speed (mph)</u>	<u>HDD65</u>	<u>AHDD65</u>	<u>AHDD65- 1</u>
Bemidji*	2/1/1996	-34	8	99	107	94
Cloquet*	2/2/1996	-31	7	96	103	100
Fargo*	1/18/1996	-16	34	81	109	85
International Falls*	2/2/1996	-34	8	99	107	107
Minneapolis	2/2/1996	-25	8	90	97	92
Rochester	2/2/1996	-27	10	92	101	94
Worthington	1/29/2019	-20	21	85	103	81
Ortonville	1/14/2009	-21	11	86	95	86

* Consolidated PGA weather station.

As shown in Table 4, for each of the regression models MERC’s planning objective did not occur during the data period (2022 through 2025); as such, the Company adjusted the results to approximate usage at the planning objective. The Company’s combined regression analyses resulted in a design-day estimate of 55,263 Dth/day. However, as explained in MERC’s filing, the Company modified the analysis such that the ultimate design-day estimate was based on a higher throughput estimate that factors in a volume risk adjustment.¹⁸ This adjustment resulted in a calculated design-day estimate of 58,794 Dth/day, which is 1,058 Dth/day greater than the design-day estimate in last year’s demand entitlement filing. The Company states that volume risk adjustments were incorporated into the forecast to provide a confidence level that the daily metered load under design conditions would not exceed the daily metered regression estimate.¹⁹ In other words, the volume risk adjustment is meant to modify the results to ensure a bias toward reliability since this adjustment places the design-day estimate at the top end of expected design-day conditions based on the regressions. This post-regression adjustment is similar to adjustments the Company used in previous demand entitlement filings. The Department reviewed MERC’s analysis and was able to replicate the Company’s results.

In addition, the Company tried to estimate firm peak day estimates for each of its gate stations. The Commission’s April 28, 2016, Order in Docket Nos. G011/M-15-722, G011/M-15-723, and G011/M-15-724, at Order point 10, stated in part the following:²⁰

Required MERC to verify its regression analysis results in future demand entitlement filings to ensure the results are consistent with the underlying theory the analysis attempts to explain.

¹⁸ Petition, Attachment 12.

¹⁹ Petition, Attachment 12 at page 6.

²⁰ April 28, 2016 Order at 2.

In its Petition, MERC states the following:²¹

Order Point 10 of the Commission’s April 28, 2016, Order in Docket No. G011/M-15-723 required that MERC verify its regression analysis results in future demand entitlement filings to ensure the results are consistent with the underlying theory the analysis attempts to explain. MERC has carefully reviewed the results of its regression analysis and verified that the results are consistent with the underlying theory the analysis attempts to explain. Please see MERC’s May 31, 2016, compliance filing in Docket Nos. G011/M-15-722, G011/M-15 723, and G011/M-15-724 for further discussion of this issue.

Thus, MERC complied with the Commission’s April 28, 2016, Order described above.

The Department notes that MERC appropriately corrected its models for autocorrelation, as required by the Commission’s February 4, 2015 Order, wherein the Commission required that, in its future demand entitlement filings, MERC check the regression models it ultimately uses for autocorrelation and correct the model if autocorrelation is present.²²

Given the fact that MERC must plan for its design-day, the Department concludes that MERC’s approach is not unreasonable. As a result, the Department recommends that the Commission approve the Company’s peak-day analysis.

D. PROPOSED RESERVE MARGIN

As indicated in Department Attachment 1, the proposed reserve margin is 5,870 Dth, or 9.98%, as shown in Table 5.

Table 5: MERC-Consolidated Reserve Margin

Pipeline	Total Entitlement (Dth)	Design-day Estimate (Dth)	Difference (Dth)	Reserve Margin %	Percentage Point Change From Previous Year²³
Centra	10,343	9,850	493	5.01%	0.00%
Great Lakes	33,530	30,489	3,041	9.97%	(0.89)%
Viking	20,791	18,455	2,336	12.66%	(3.72)%
Total Consolidated	64,664	58,794	5,870	9.98%	(1.61)%

The proposed reserve margin of 9.98% represents a decrease of 1.61 percentage points as compared to last year’s reserve margin of 11.59%.²⁴ The decrease in the reserve margin is driven by an increase in

²¹ Petition, Attachment 12 at pages 10-11.

²² February 4, 2015 Order at 2.

²³ For the 2024-2025 heating season, the reserve margins were as follows: Centra – 5.01%; Great Lakes – 10.86%; Viking – 16.38%; and Total – Consolidated – 11.59%.

²⁴ Petition Attachment 3.

capacity on the Centra pipeline coupled with increases in design-day estimates for MERC-Consolidated customers located along all three pipeline areas.

Based on the Department's review of MERC's historic design-day data and regression results, the Department concludes that MERC's reserve margin is acceptable.

E. THE COMPANY'S PGA COST RECOVERY PROPOSAL

In its Attachment 4 of the Petition, MERC compares its July 2025 PGA to MERC's projected November 2025 PGA rates to highlight the changes in demand costs. According to MERC's calculations, the Company's demand entitlement proposal would result in the following annual demand cost impacts:

- Annual bill increase of \$5.09 related to demand costs, or approximately 6.64 percent, for the average General Service customer consuming 86 dekatherms annually.
- Annual bill increase of \$40.97 related to demand costs, or approximately 6.64 percent, for the average Large Commercial and Industrial customer consuming 694 dekatherms annually; and.
- No demand cost impacts related to MERC's Consolidated interruptible rate classes.²⁵

The Company will provide updated costs in its November 2025 Update and the Department will provide its recommendations after the Company files its Update.

F. COMMISSION ORDERS IN DOCKET NO G999/CI-21-135 AND G011/CI-21-611

Ordering Paragraphs 9 and 10 of the Commission's February 17, 2023 Order state the following:

9. In future contract demand entitlement filings, the gas utilities in this docket shall discuss how changes to their pipeline capacity affect their supply diversity and, if pipeline capacity comes at a cost premium but increases supply diversity, provide a meaningful cost/benefit discussion of the tradeoff, including a comparison with the least-cost capacity option.
10. Each gas utility in this docket shall include in its relevant annual, forward-looking gas planning or hedging filings:

- A. Its expected supply mixes across different load and weather conditions throughout each month of the upcoming winter season;
- B. The forecasted minimum, average, and maximum day load requirements; and

²⁵ Petition, Attachment 4.

- C. The expected mix of baseload, storage, and spot supply on those days.²⁶

In its Petition, the Company provides the required information.²⁷ MERC states:

The acquired incremental capacity discussed above did not impact MERC's supply diversity, as the Company increased its capacity with supply to be sourced at the Spruce supply basin, which is the only supply option on Centra Pipeline.²⁸

Regarding compliance with paragraph 10, the Company states that it provided the requested information in its Attachment 6 using the three prior years data. MERC states the following:

Attachment 6, page 3, provides this information for the November 2025 through March 2026 period. All load estimates are based on the previous three years observed data, except for the December through February months, in which the Design Day (i.e. Peak Day) was used to represent the maximum load. While three years of historical data provide a reasonable estimate, conditions can deviate and provide load requirements different from those in the past.²⁹

The Department concludes that MERC complied with the February 17, 2023 Order. In addition, after reviewing the information provided by MERC, the Department concludes that MERC's explanations regarding its compliance with the Ordering paragraphs 9 and 10 are acceptable. However, the prudence of the natural gas costs inferred above, and actions taken by MERC to minimize those costs will be evaluated in a future proceeding when MERC files its annual automatic adjustment report and true up filing on September 1, 2026.

G. ANRP AND GLGT RATE CASES AT FERC

On April 1, 2025 ANRP filed a rate case at FERC in Docket No. RP25-806 and proposed increases in their rates.³⁰ The rates are effective November 1, 2025 subject to refund. On April 30, 2025 GLGT filed a rate case at FERC in Docket No. RP25-855 and proposed increases in their rates. The rates for both pipelines are effective November 1, 2025, subject to refund. In its Petition the Company stated the following:³¹

Additionally, MERC notes that ANR Pipeline filed a Section 4 rate case in Docket No. RP25-806 and Great Lakes Gas Transmission filed a Section 4 rate case in Docket No. RP25- 855, with the Federal Energy Regulatory Commission ("FERC") on April 1, 2025 and April 30, 2025, respectively.

²⁶ February 17, 2023 Order at 23.

²⁷ Petition at 5, 7-8, and Attachment 6 at 3.

²⁸ *Id.*, at 5.

²⁹ *Id.*, at 8.

³⁰ Petition, Attachment C at 6.

³¹ *Ibid.*

Both rate case petitions requested that rates to go into effect on November 1, 2025. Since the result of the rate case is unknown at this time, MERC has held rates at current levels for determining its demand rate in this proceeding. In accordance with Minn. R. 7825.2910, MERC will reflect actual rate increases in its monthly PGA filing when those rates go into effect.

The Department recommends that MERC provide an update regarding the above rate cases, including the projected impacts—for example, on demand costs and on its efforts in the FERC proceedings and the results of those efforts—in its November update.

IV. DEPARTMENT RECOMMENDATIONS

The Department recommends approval of the Company's Design-Day Analysis, but withholds its final recommendations for the remainder of the Company's Petition until after the Company files its Reply Comments and files its update in November 2025.

Department Attachment 1
Docket No. G011/M-25-69
MERC Consolidated Demand Entitlement Analysis

	Number of Firm Customers			Design-Day Requirement			Total Entitlement Plus Peak Shaving			Reserve Margin	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
Heating Season	Number of Customers	Change from Previous Year	% Change From Previous Year	Design Day (Dth)	Change from Previous Year	% Change From Previous Year	Total Design-Day Capacity (Dth)	Change from Previous Year	% Change From Previous Year	Reserve (7) - (4)	% Reserve [(7)-(4)]/(4)
2025-2026	37,868	(30)	-0.08%	58,794	1,058	1.83%	64,664	235	0.36%	5,870	9.98%
2024-2025	37,898	470	1.26%	57,736	588	1.03%	64,429	2,410	3.89%	6,693	11.59%
2023-2024	37,428	(150)	-0.40%	57,148	185	0.32%	62,019	2,000	3.33%	4,871	8.52%
2022-2023	37,578	427	1.15%	56,963	560	0.99%	60,019	1,170	1.99%	3,056	5.36%
2021-2022	37,151	571	1.56%	56,403	(662)	-1.16%	58,849	200	0.34%	2,446	4.34%
2020-2021	36,580	599	1.66%	57,065	283	0.50%	58,649	700	1.21%	1,584	2.78%
2019-2020	35,981	328	0.92%	56,782	312	0.55%	57,949	0	0.00%	1,167	2.06%
2018-2019	35,653	(312)	-0.87%	56,470	204	0.36%	57,949	0	0.00%	1,479	2.62%
2017-2018	35,965	466	1.31%	56,266	738	1.33%	57,949	3,050	5.56%	1,683	2.99%
2016-2017	35,499	700	2.01%	55,528	2,453	4.62%	54,899	(550)	-0.99%	(629)	-1.13%
2015-2016	34,799	402	1.17%	53,075	4,369	8.97%	55,449	3,990	7.75%	2,374	4.47%
2014-2015	34,397	390	1.15%	48,706	(1,342)	-2.68%	51,459	(1,500)	-2.83%	2,753	5.65%
2013-2014	34,007	377	1.12%	50,048	(2,241)	-4.29%	52,959	(2,000)	-3.64%	2,911	5.82%
2012-2013	33,630			52,289			54,959				
Average			0.92%			0.95%			1.31%		5.00%

	Firm Peak-Day Sendout			Per Customer Metrics			
	(12)	(13)	(14)	(15)	(16)	(17)	(18)
Heating Season	Firm Peak-Day Sendout (Dth)	Change from Previous Year	% Change From Previous Year	Excess per Customer [(7) - (4)]/(1)	Design Day per Customer (4)/(1)	Entitlement per Customer (7)/(1)	Peak-Day Send per Customer (12)/(1)
2025-2026	unknown			0.1550	1.5526	1.7076	unknown
2024-2025	52,834	6,645	14.39%	0.1766	1.5235	1.7001	1.3941
2023-2024	46,189	(130)	-0.28%	0.1301	1.5269	1.6570	1.2341
2022-2023	46,319	276	0.60%	0.0813	1.5159	1.5972	1.2326
2021-2022	46,043	(4,880)	-9.58%	0.0658	1.5182	1.5840	1.2393
2020-2021	50,923	6,963	15.84%	0.0433	1.5600	1.6033	1.3921
2019-2020	43,960	(9,693)	-18.07%	0.0324	1.5781	1.6105	1.2218
2018-2019	53,653	7,215	15.54%	0.0415	1.5839	1.6254	1.5049
2017-2018	46,438	(2,358)	-4.83%	0.0468	1.5645	1.6113	1.2912
2016-2017	48,796	6,117	14.33%	-0.0177	1.5642	1.5465	1.3746
2015-2016	42,679	(3,072)	-6.71%	0.0682	1.5252	1.5934	1.2264
2014-2015	45,751	6,845	17.59%	0.0800	1.4160	1.4960	1.3301
2013-2014	38,906			0.0856	1.4717	1.5573	1.1441
Average			3.53%	0.0761	1.5308	1.6069	1.2988

Source: MERC's Attachment 1, 3 and 7.

CERTIFICATE OF SERVICE

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

Minnesota Department of Commerce
Comments

Docket No. G011/M-25-69

Dated this **2nd** day of **September 2025**

/s/Nicole Westling

#	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	M-25-69
2	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-69
3	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	M-25-69
4	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	M-25-69
5	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	M-25-69
6	Joylyn C	Hoffman Malueg	joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources		2685 145th St W Rosemount MN, 55068 United States	Electronic Service		No	M-25-69
7	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-69
8	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	M-25-69
9	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	M-25-69

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10	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-69
11	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	M-25-69
12	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	M-25-69
13	Tina E	Wuyts	tina.wuyts@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		PO Box 19001 700 N Adams St Green Bay WI, 54307-9001 United States	Electronic Service		No	M-25-69