

MICHAEL J. AHERN
PARTNER
(612) 340-2881
FAX (612) 340-2643
ahern.michael@dorsey.com

April 16, 2015

Mr. Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
Metro Square – Suite 350
212 7th Place East
St. Paul, MN 55101-2147

**Re: Petition of Minnesota Energy Resources Corporation to Modify Its Main and Service Extension Model and Amend Its Extension Tariffs
Docket No. G011/M-15-165
Reply Comments**

Dear Mr. Wolf:

On April 15, 2015, the Minnesota Department of Commerce, Division of Energy Resources (the Department) filed Comments on Minnesota Energy Resources Corporation's (MERC) Petition to Modify its Main and Service Extension Model and Amend its Extension Tariffs. MERC thanks the Department for its thorough review and comments and agrees with the Department's recommendations that the Commission approve MERC's proposal including:

1. revised and updated Customer Extension Model and related assumptions to be used to determine whether customer contributions in aid of construction (CIAC) are required to support natural gas extension projects; and,
2. amended tariffs to remove the step-by-step input and assumption details used by MERC in conducting the Customer Extension Model, replacing it with a general description of the revised extension model.

In light of the Department's recommendations that the Commission approve MERC's petition as submitted, MERC respectfully requests that the Commission schedule this matter for decision as soon as possible so that the Company can implement the new Customer Extension Model this year.

Please contact me at 612-340-2881 if you have any questions regarding this matter.

Sincerely,

/s/ Michael J. Ahern

Michael J. Ahern

AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)
) ss
COUNTY OF HENNEPIN)

Kristin M. Stastny hereby certifies that on the 16th day of April, 2015, on behalf of Minnesota Energy Resources Corporation (MERC) she electronically filed a true and correct copy of the attached Reply Comments on www.edockets.state.mn.us. Said documents were also served via U.S. mail and electronic service as designated on the attached service list.

/s/ Kristin M. Stastny _____
Kristin M. Stastny

Subscribed and sworn to before me
This 16th Day of April, 2015.

/s/ Alice Jaworski
Notary Public, State of Minnesota

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_15-165_M-15-165
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_15-165_M-15-165
Michael	Bradley	mike.bradley@lawmoss.com	Moss & Barnett	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-165_M-15-165
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_15-165_M-15-165
Daryll	Fuentes	dfuentes@usg.com	USG Corporation	550 W Adams St Chicago, IL 60661	Electronic Service	No	OFF_SL_15-165_M-15-165
David G.	Kult	dgkult@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	2665 145th St. NW Rosemount, MN 55068	Electronic Service	Yes	OFF_SL_15-165_M-15-165
Amber	Lee	ASLee@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	2665 145th Street West Rosemount, MN 55068	Electronic Service	Yes	OFF_SL_15-165_M-15-165
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_15-165_M-15-165
Brian	Meloy	brian.meloy@stinsonleonard.com	Stinson, Leonard, Street LLP	150 S 5th St Ste 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-165_M-15-165
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-165_M-15-165
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_15-165_M-15-165

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_15-165_M-15-165