

**STATE OF MINNESOTA  
BEFORE THE PUBLIC UTILITIES COMMISSION**

Katie Sieben	Chair
Joseph K. Sullivan	Vice-Chair
Valerie Means	Commissioner
Matt Schuerger	Commissioner
John Tuma	Commissioner

In the Matter of a Petition of Minnesota  
Energy Resources Corporation for Approval of  
Farm Tap Customer-Owned Fuel Line  
Replacement Plan, Tariff Amendments, and  
Deferred Accounting

DOCKET NO. G-011/M-17-409

**COMMENTS OF THE OFFICE OF  
THE ATTORNEY GENERAL**

**INTRODUCTION**

The Office of the Attorney General—Residential Utilities Division (“OAG”) respectfully submits the following Comments in response to the Notice of Extended Comment Period issued on August 26, 2020 in the above-entitled matter. The purpose of these Comments is to demonstrate that the Commission should allow Minnesota Energy Resources Corporation (“MERC” or “Company”) to require ratepayers to pay to replace farm taps for *all* affected customers, except for a modest fee in lieu of a contribution in aid of construction (“CIAC”). Requiring this fee from farm tap customers will ensure that MERC’s ratepayers only pay to replace farm taps for customers that intend to use them.

**I. BACKGROUND**

On May 19, 2017, MERC filed a Farm Tap Customer Owned Fuel Line Replacement Plan (“2017 Petition”) with the Commission. The 2017 Petition outlined the history of farm tap customers in MERC’s service territory. Starting more than 85 years ago, Northern Natural Gas (“NNG”) offered to allow customers access to the interstate pipeline in exchange for the

easements necessary to build the pipeline.<sup>1</sup> Landowners installed the fuel lines to access the taps installed by NNG, resulting in a variety of mapping techniques and materials used in these farm taps.<sup>2</sup> In 1987, NNG executed a thirty-year agreement with Peoples Natural Gas Company (“Peoples”), whereby Peoples provided limited services, including meter reading and odorization, to farm tap customers.<sup>3</sup> In 2006, after a series of mergers and acquisitions, MERC assumed Peoples’ duties under the agreement with NNG.<sup>4</sup> While MERC was not a party to the original agreement, it has agreed to continue providing farm tap service on a month-to-month basis until a final decision is issued in this proceeding.<sup>5</sup> Farm tap customers have not received the same services as general service customers, but they have paid general service rates and thus contributed to rate base.<sup>6</sup>

MERC indicated that, due to safety concerns with the current arrangement, it would rather discontinue farm tap service than continue providing it under the status quo.<sup>7</sup> In the 2017 Petition, MERC proposed to resolve this issue by replacing all of the farm taps with company-owned main and service lines at an estimated cost of \$45 million.<sup>8</sup> Concerned about the impact on MERC’s other ratepayers, the OAG filed comments recommending that the Commission consider alternative solutions before approving the project.<sup>9</sup>

On December 30, 2019, MERC filed its Report on Farm Tap Planning and Design Phase and Phase II Procedural Proposal (“Proposal”). In the Proposal, MERC explored several alternatives to replacing farm taps with Company-owned infrastructure, including alternatives

---

<sup>1</sup> 2017 Petition at 5.

<sup>2</sup> *Id.* at 5.

<sup>3</sup> *Id.* at 5–8.

<sup>4</sup> *Id.* at 6.

<sup>5</sup> *Id.* at 9.

<sup>6</sup> *Id.* at 21.

<sup>7</sup> *Id.* at 22.

<sup>8</sup> *Id.* at 22–27.

<sup>9</sup> OAG Comments at 10–12 (Sept. 18, 2017).

suggested in the OAG Comments.<sup>10</sup> MERC concluded that replacing the farm taps was the most prudent course of action.<sup>11</sup> After the initial planning phase, MERC now believes that replacing all farm taps would cost \$46.6 million.<sup>12</sup> MERC now proposes only to replace farm taps for customers located within one mile of MERC's distribution system, which would reduce the project cost to \$7.1 million but only continue service to 14 percent of the farm tap customers.<sup>13</sup> Customers that are more than a mile from MERC's distribution system would need to make a prohibitively large CIAC to maintain their farm tap.<sup>14</sup>

## II. ANALYSIS

To allow farm tap customers to keep receiving service, and to recognize their historical contributions to MERC's base rates, the Commission should allow MERC to recover from all ratepayers the cost of replacing all farm taps with Company-owned infrastructure for all farm tap customers. Farm tap customers should, however, pay a modest fee in lieu of a CIAC to ensure that MERC's ratepayers only pay for farm tap customers who actually intend to use the new infrastructure.

### A. THE COMMISSION SHOULD ALLOW MERC TO REPLACE THE FARM TAPS FOR ALL AFFECTED CUSTOMERS AND RECOVER COSTS FROM ALL CUSTOMERS.

Replacing farm taps with company-owned equipment for farm tap customers that want to continue receiving natural gas service, and having the whole system pay for the cost of doing so, is the most reasonable option. While the OAG understands that controlling rates for MERC's other customers was the underlying motivation for limiting its proposal to customers located within one mile of the Company's distribution system, excluding the remainder of the farm tap

---

<sup>10</sup> Proposal at 8–12.

<sup>11</sup> *Id.* at 12–16.

<sup>12</sup> *Id.* at 6.

<sup>13</sup> *Id.* at 13–14.

<sup>14</sup> *Id.* at 14.

customers would not be an equitable outcome for those customers. As MERC has noted, despite not causing the same costs as general service customers, farm tap customers have historically paid general service rates. It would be unjust for the system now not to pay for the necessary upgrades to provide safe and reliable service to farm tap customers.

While the price tag is substantial, the unique situation presented here justifies incurring these costs. The Company estimates that replacing all farm taps would increase its revenue requirement by more than \$5 million per year.<sup>15</sup> The impact to an average residential ratepayer for the total project would be \$16 per year, or \$1.33 per month.<sup>16</sup> The OAG does not take this kind of rate impact to residential ratepayers lightly. That said, a rate increase of less than \$2 per month for residential customers is reasonable if it means that 1,550 customers who have contributed to base rates for several decades get to continue receiving natural gas service. Accordingly, the Commission should accept MERC's proposal to socialize the farm tap replacement costs, and expand it to include all farm tap customers.

**B. THE COMMISSION SHOULD REQUIRE A MODEST CONTRIBUTION FROM FARM TAP CUSTOMERS TO ENSURE THAT RATEPAYERS ONLY PAY FOR FARM TAP CUSTOMERS WHO WILL ACTUALLY USE NATURAL GAS SERVICE.**

The Commission should require any farm tap customer wishing to continue receiving natural gas service to make a modest \$500 contribution to the replacement project. While this may seem inconsistent with the recommendation that the costs of the replacement project should be socialized, it would be an important protection for existing ratepayers because it would reduce unnecessary projects and lower overall costs.

---

<sup>15</sup> See MERC Response to Department IR No. 45 (attached hereto as Exhibit A).

<sup>16</sup> *Id.*

Depending on the methodology used to calculate the CIAC, the average contribution for a farm tap customer would be \$39,601.<sup>17</sup> By contributing \$500, these customers would be paying less than two percent of this cost. The purpose of this contribution, however, would not be to fund a meaningful portion of the project costs. Rather, requiring this contribution would protect other ratepayers by ensuring that they only pay replacement costs for farm tap customers who value their natural gas service and intend to continue using it.

During the planning and design phase of this project, MERC experienced significant disinterest on the part of some farm tap customers.<sup>18</sup> When trying to study the feasibility of this project, MERC had to send three rounds of letters and reduce its target sample size due to a lack of response, ultimately needing to contact 520 customers just to find 275 who were willing to participate.<sup>19</sup> If the low response rate reflects a lack of interest in receiving natural gas service, moving forward with the replacement project would risk spending millions of dollars on natural gas infrastructure for customers who do not value it. Asking farm tap customers to contribute less than two percent of the extension costs is a fair way to make sure that these upgrades only go to customers who are actually invested in receiving natural gas service.

Finally, while the purpose of the \$500-per-customer contribution is not to recoup a significant portion of the project costs, the contributions should be used to offset the ultimate revenue-requirement impact of the replacement project costs.

## CONCLUSION

It is important that farm tap customers be able to continue receiving safe and reliable natural gas service. For this reason, and in recognition of these customers' historical

---

<sup>17</sup> Proposal at 20.

<sup>18</sup> *Id.* at 3.

<sup>19</sup> *Id.* at 4–5.

contribution to base rates, the costs of their replacement projects should be socialized, save for a modest \$500 contribution in lieu of a CIAC.

Dated: September 14, 2020

Respectfully submitted,

KEITH ELLISON  
Attorney General  
State of Minnesota

/s/ Peter G. Scholtz

PETER G. SCHOLTZ  
Assistant Attorney General  
Atty. Reg. No. 0389936

445 Minnesota Street, Suite 1400  
St. Paul, Minnesota 55101-2131  
(651) 757-1473 (Voice)  
(651) 296-9663 (Fax)  
[peter.scholtz@ag.state.mn.us](mailto:peter.scholtz@ag.state.mn.us)

ATTORNEYS FOR OFFICE OF THE  
ATTORNEY GENERAL—RESIDENTIAL  
UTILITIES DIVISION



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

**Docket Number:** G011/M-17-409  
**Requested From:** Minnesota Energy Resources Corp  
**Type of Inquiry:** General

Nonpublic  Public  
**Date of Request:** 4/27/2020  
**Response Due:** 5/7/2020

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

**Assigned Analyst(s):** Michael Zajicek, Dorothy Morrissey  
**Email Address(es):** michael.zajicek@state.mn.us; dorothy.morrissey@state.mn.us  
**Phone Number(s):** 651.539.1830; 651.539.1797

**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:** 45  
**Topic:** Billing Impacts  
**Reference(s):** Petition Pages 17-18

---

**Request:**

Please provide a spreadsheet showing the percent increase for an average customer's bills, both monthly and yearly, for all customer classes and for both the replacement of all farm tap lines and MERC's proposal.

**Response:** Please see attached spreadsheet. These estimates do not include gas costs.

	Proposed		Annual		Monthly	
	Rate/Therm	\$/Customer	Avg Bill	% Increase	Avg Bill	% Increase
Residential	\$ 0.00360	\$ 3	\$ 720	0.4%	\$ 60	0.4%
Class 1-2 Firm (Sales and Transport)	\$ 0.00216	\$ 10	\$ 3,081	0.3%	\$ 257	0.3%
Class 1-2 Interruptible (Sales and Transport), Class 1-2 Ag Grain Dryer, and Class 1 Power Gen	\$ 0.00216	\$ 92	\$ 18,676	0.5%	\$ 1,556	0.5%
Class 3-4 Firm (Sales and Transport)	\$ 0.00036	\$ 60	\$ 96,406	0.1%	\$ 8,034	0.1%
Class 3-4 Interruptible (Sales and Transport) and Class 3-4 Ag Grain Dryer	\$ 0.00036	\$ 203	\$ 91,761	0.2%	\$ 7,647	0.2%
Class 5, FLEX, Transport for Resale, and Class 2 Power Gen	\$ 0.00036	\$ 1,566	\$ 76,551	2.0%	\$ 6,379	2.0%
Direct Connect	\$ -	\$ -				
	Total Replacement		Annual		Monthly	
	Rate/Therm	\$/Customer	Avg Bill	% Increase	Avg Bill	% Increase
Residential	\$ 0.01821	\$ 16	\$ 720	2.2%	\$ 60	2.2%
Class 1-2 Firm (Sales and Transport)	\$ 0.01094	\$ 49	\$ 3,081	1.6%	\$ 257	1.6%
Class 1-2 Interruptible (Sales and Transport), Class 1-2 Ag Grain Dryer, and Class 1 Power Gen	\$ 0.01094	\$ 465	\$ 18,676	2.5%	\$ 1,556	2.5%
Class 3-4 Firm (Sales and Transport)	\$ 0.00184	\$ 305	\$ 96,406	0.3%	\$ 8,034	0.3%
Class 3-4 Interruptible (Sales and Transport) and Class 3-4 Ag Grain Dryer	\$ 0.00184	\$ 1,036	\$ 91,761	1.1%	\$ 7,647	1.1%
Class 5, FLEX, Transport for Resale, and Class 2 Power Gen	\$ 0.00184	\$ 8,003	\$ 76,551	10.5%	\$ 6,379	10.5%
Direct Connect	\$ -	\$ -				

To be completed by responder

**Response Date:** May 7, 2020  
**Response by:** Mary Wolter, Director Gas Regulatory Planning & Policy  
**Email Address:** mary.wolter@weenergygroup.com  
**Phone Number:** (414) 221-2374

Support for DOC-45

**2020 Revenue Requirement for GUIC Rider - Farm Tap Phase II, Year 6**

**Description**

Residential  
Class 1-2 Firm (Sales and Transport)  
Class 1-2 Interruptible (Sales and Transport), Class 1-2 Ag Grain Dryer, and Class 1 Power Gen  
Class 3-4 Firm (Sales and Transport)  
Class 3-4 Interruptible (Sales and Transport) and Class 3-4 Ag Grain Dryer  
Class 5, FLEX, Transport for Resale, and Class 2 Power Gen  
Direct Connect

Proposed		Annual		Monthly	
Rate/Therm	\$/Customer	Avg Bill	% Increase	Avg Bill	% Increase
\$ 0.00360	\$ 3	\$ 720	0.4%	\$ 60	0.4%
\$ 0.00216	\$ 10	\$ 3,081	0.3%	\$ 257	0.3%
\$ 0.00216	\$ 92	\$ 18,676	0.5%	\$ 1,556	0.5%
\$ 0.00036	\$ 60	\$ 96,406	0.1%	\$ 8,034	0.1%
\$ 0.00036	\$ 203	\$ 91,761	0.2%	\$ 7,647	0.2%
\$ 0.00036	\$ 1,566	\$ 76,551	2.0%	\$ 6,379	2.0%
\$ -	\$ -				

Residential  
Class 1-2 Firm (Sales and Transport)  
Class 1-2 Interruptible (Sales and Transport), Class 1-2 Ag Grain Dryer, and Class 1 Power Gen  
Class 3-4 Firm (Sales and Transport)  
Class 3-4 Interruptible (Sales and Transport) and Class 3-4 Ag Grain Dryer  
Class 5, FLEX, Transport for Resale, and Class 2 Power Gen  
Direct Connect

Total Replacement		Annual		Monthly	
Rate/Therm	\$/Customer	Avg Bill	% Increase	Avg Bill	% Increase
\$ 0.01821	\$ 16	\$ 720	2.2%	\$ 60	2.2%
\$ 0.01094	\$ 49	\$ 3,081	1.6%	\$ 257	1.6%
\$ 0.01094	\$ 465	\$ 18,676	2.5%	\$ 1,556	2.5%
\$ 0.00184	\$ 305	\$ 96,406	0.3%	\$ 8,034	0.3%
\$ 0.00184	\$ 1,036	\$ 91,761	1.1%	\$ 7,647	1.1%
\$ 0.00184	\$ 8,003	\$ 76,551	10.5%	\$ 6,379	10.5%
\$ -	\$ -				



2020 Revenue Requirement for GUIC Rider - Farm Tap Phase II, Year 6

Line	Description	Reference	Forecasted Year		MN Jurisdiction Only					
			2018 Rate Case	6	Incremental Costs		Rate Case Apportionment		Full Replacement	
1	Depreciation Expense	See Note 1	\$ -	\$ 1,000,000	\$ 1,000,000		\$ 1,000,000		\$ 1,000,000	
2	Property Tax, Other Incremental O&M Expense		\$ -	\$ -	\$ -		\$ -		\$ -	
3	Rate Base	13-Month Average Net Plant Value	\$ -	\$ 43,700,000	\$ 43,700,000		\$ 43,700,000		\$ 43,700,000	
4	ADIT Proration Adjustment		\$ -	\$ -	\$ -		\$ -		\$ -	
5	Adjusted Rate Base	13-Month Average Net Plant Value	\$ -	\$ 43,700,000	\$ 43,700,000		\$ 43,700,000		\$ 43,700,000	
6	Rate of Return	Commission Authorized 2018 Rate Case			6.6971%		6.6971%		6.6971%	
7	Earnings on Rate Base	Line 5 x Line 6			\$ 2,926,633		\$ 2,926,633		\$ 2,926,633	
8	Gross Revenue Conversion Factor	2018 Rate Case Adjusted for Tax Reform			1.402		1.402		1.402	
9	Return on Rate Base	Line 7 x Line 8			\$ 4,103,139		\$ 4,103,139		\$ 4,103,139	
10										
11	Total Revenue Requirement	Line 1 + Line 2 + Line 9			\$ 5,103,139		\$ 5,103,139		\$ 5,103,139	
12										
13	Offsetting Project Revenue	See Note 2			\$ 46,499		\$ 46,499		\$ 46,499	
14										
15	2020 Annual Revenue Deficiency	Line 11 less line 13			\$ 5,056,640		\$ 5,056,640		\$ 5,056,640	
16										
17	Total Therms - MN Jurisdictional	See Note 3			771,153,868		771,153,868		771,153,868	
18										
19	Average Per Therm Increase	Line 17 / Line 19			\$ 0.00656		\$ 0.00656		\$ 0.00656	
20	Residential				Rate/Therm	\$/Customer	Rate/Therm	\$/Customer	Rate/Therm	\$/Customer
21	Class 1-2 Firm (Sales and Transport)				\$ 0.00656	\$ 6	\$ 0.01692	\$ 15	\$ 0.01821	\$ 16
22	Class 1-2 Interruptible (Sales and Transport), Class 1-2 Ag Grain Dryer, and Class 1 Power Gen				\$ 0.00656	\$ 29	\$ 0.01163	\$ 52	\$ 0.01094	\$ 49
23	Class 3-4 Firm (Sales and Transport)				\$ 0.00656	\$ 59	\$ 0.00147	\$ 63	\$ 0.01094	\$ 465
24	Class 3-4 Interruptible (Sales and Transport) and Class 3-4 Ag Grain Dryer				\$ 0.00656	\$ 5,114	\$ 0.01163	\$ 1,928	\$ 0.00184	\$ 305
25	Class 5, FLEX, Transport for Resale, and Class 2 Power Gen				\$ 0.00656	\$ 3,691	\$ 0.00147	\$ 827	\$ 0.00184	\$ 1,036
26	Direct Connect				\$ 0.00656	\$ 28,521	\$ 0.00147	\$ 6,394	\$ 0.00184	\$ 8,003
					\$ 0.00656	\$ 214,867	\$ 0.00147	\$ 48,169	\$ -	\$ -

Estimated Project Costs:  
**\$ 46,557,719**

	Capital Inv	Avg Capital	Depreciation	Net Capital
Year 0	0	0	0	0
Year 1	\$ 9,311,544	\$ 4,655,772	\$ 116,394	\$ 9,195,150
Year 2	\$ 9,311,544	\$ 13,850,921	\$ 346,273	\$ 18,160,420
Year 3	\$ 9,311,544	\$ 22,816,192	\$ 570,405	\$ 26,901,559
Year 4	\$ 9,311,544	\$ 31,557,331	\$ 788,933	\$ 35,424,170
Year 5	\$ 9,311,544	\$ 40,079,942	\$ 1,001,999	\$ 43,733,715
Year 6	0	\$ 43,733,715	\$ 1,093,343	\$ 42,640,372
Year 7	0	\$ 42,640,372	\$ 1,066,009	\$ 41,574,363
Year 8	0	\$ 41,574,363	\$ 1,039,359	\$ 40,535,004
Year 9	0	\$ 40,535,004	\$ 1,013,375	\$ 39,521,629
Year 10	0	\$ 39,521,629	\$ 988,041	\$ 38,533,588
Year 11	0	\$ 38,533,588	\$ 963,340	\$ 37,570,248
Year 12	0	\$ 37,570,248	\$ 939,256	\$ 36,630,992
Year 13	0	\$ 36,630,992	\$ 915,775	\$ 35,715,217
Year 14	0	\$ 35,715,217	\$ 892,880	\$ 34,822,337
Year 15	0	\$ 34,822,337	\$ 870,558	\$ 33,951,778
Year 16	0	\$ 33,951,778	\$ 848,794	\$ 33,102,984
Year 17	0	\$ 33,102,984	\$ 827,575	\$ 32,275,409
Year 18	0	\$ 32,275,409	\$ 806,885	\$ 31,468,524
Year 19	0	\$ 31,468,524	\$ 786,713	\$ 30,681,811
Year 20	0	\$ 30,681,811	\$ 767,045	\$ 29,914,766
Year 21	0	\$ 29,914,766	\$ 747,869	\$ 29,166,897
Year 22	0	\$ 29,166,897	\$ 729,172	\$ 28,437,724
Year 23	0	\$ 28,437,724	\$ 710,943	\$ 27,726,781
Year 24	0	\$ 27,726,781	\$ 693,170	\$ 27,033,612
Year 25	0	\$ 27,033,612	\$ 675,840	\$ 26,357,771
Year 26	0	\$ 26,357,771	\$ 658,944	\$ 25,698,827
Year 27	0	\$ 25,698,827	\$ 642,471	\$ 25,056,356
Year 28	0	\$ 25,056,356	\$ 626,409	\$ 24,429,947
Year 29	0	\$ 24,429,947	\$ 610,749	\$ 23,819,199
Year 30	0	\$ 23,819,199	\$ 595,480	\$ 23,223,719
Year 31	0	\$ 23,223,719	\$ 580,593	\$ 22,643,126
Year 32	0	\$ 22,643,126	\$ 566,078	\$ 22,077,048
Year 33	0	\$ 22,077,048	\$ 551,926	\$ 21,525,121
Year 34	0	\$ 21,525,121	\$ 538,128	\$ 20,986,993
Year 35	0	\$ 20,986,993	\$ 524,675	\$ 20,462,319
Year 36	0	\$ 20,462,319	\$ 511,558	\$ 19,950,761
Year 37	0	\$ 19,950,761	\$ 498,769	\$ 19,451,992
Year 38	0	\$ 19,451,992	\$ 486,300	\$ 18,965,692
Year 39	0	\$ 18,965,692	\$ 474,142	\$ 18,491,550
Year 40	0	\$ 18,491,550	\$ 462,289	\$ 18,029,261
Year 41	0	\$ 18,029,261	\$ 450,732	\$ 17,578,529
Year 42	0	\$ 17,578,529	\$ 439,463	\$ 17,139,066
Year 43	0	\$ 17,139,066	\$ 428,477	\$ 16,710,589
Year 44	0	\$ 16,710,589	\$ 417,765	\$ 16,292,825
Year 45	0	\$ 16,292,825	\$ 407,321	\$ 15,885,504

Notes

- Assumes a depreciation rate of 0.025
- This represents incremental customers and sales growth of 100 customers @ Farm Tap Residential Rate of \$9.50/month plus 1615 therms/year @ \$0.21733. Potentially an additional 240 customers could be added, but that assumes 100% participation regardless of cost - an unlikely outcome. The costs to serve the projected additional 100 customers, net of excess footage charges and customer contributions, are not included in the project revenue requirement.
- Projected 2020 sales per MERC's 2018 filed rate case data in Docket No. G011/GR-17-563

2020 Revenue Requirement for GUIC Rider - Farm Tap Phase II, Year 6

Revenue Requirement: \$ 5,056,640

Rate Case Apportionment 1						
	Therm Sales	Customer Count	Revenue Apportionment	Initial Apportionment	Rate/Therm	\$/Customer
Residential	186,792,651	212,647	62.5%	\$ 3,160,400	\$ 0.01692	\$ 14.86
Firm Sales	102,149,802	22,042	23.5%	\$ 1,188,310	\$ 0.01163	\$ 53.91
Interruptible Sales	36,992,703	467	3.5%	\$ 176,982	\$ 0.00478	\$ 378.98
Transport	124,600,988	153	10.5%	\$ 148,593	\$ 0.00119	\$ 971.20
Class 5, FLEX, Trans for Resale	58,473,904	21		\$ 69,733	\$ 0.00119	\$ 3,320.63
Direct Connect	262,143,820	8		\$ 312,621	\$ 0.00119	\$ 39,077.57
Michigan Mines	n/a	n/a		n/a	n/a	
	<u>771,153,868</u>	<u>235,338</u>		<u>\$ 5,056,640</u>		

Rate Case Apportionment 2				Option 1				Option 2						
	Therm Sales	Customer Count	Revenue Apportionment	Initial Apportionment	Rate/Therm	\$/Customer	Redistribute	Apportionment	Rate/Therm	\$/Customer	Redistribute	Apportionment	Rate/Therm	\$/Customer
Residential	186,792,651	212,647	62.5%	\$ 3,160,400	\$ 0.01692	\$ 14.86		\$ 3,400,932	\$ 0.01821	\$ 16.00		\$ 3,400,932	\$ 0.01821	\$ 16.00
Class 1-2 Firm (Sales and Transport)	98,170,103	22,018	23.5%	\$ 1,142,015	\$ 0.01163	\$ 51.85		\$ 1,228,931	\$ 0.01252	\$ 55.82		\$ 1,073,976	\$ 0.01094	\$ 48.78
Class 3-4 Firm (Sales and Transport)	3,979,699	24		\$ 46,296	\$ 0.01163	\$ 1,928.50		\$ 49,819	\$ 0.01252	\$ 2,076.08		\$ 7,306	\$ 0.00184	\$ 305.11
Class 1-2 Interruptible (Sales and Transport), Class 1-2 Ag Grain Dryer, and Class 1 Power Gen	18,718,087	440	14.0%	\$ 27,480	\$ 0.00147	\$ 62.54		\$ 32,063	\$ 0.00171	\$ 72.75		\$ 204,775	\$ 0.01094	\$ 465.40
Class 3-4 Interruptible (Sales and Transport) and Class 3-4 Ag Grain Dryer	101,308,314	180		\$ 148,730	\$ 0.00147	\$ 827.35		\$ 173,533	\$ 0.00171	\$ 962.43		\$ 185,989	\$ 0.00184	\$ 1,035.60
Class 5, FLEX, Transport for Resale, and Class 2 Power Gen	100,041,194	23		\$ 146,869	\$ 0.00147	\$ 6,393.94		\$ 171,363	\$ 0.00171	\$ 7,437.85		\$ 183,663	\$ 0.00184	\$ 8,003.30
Direct Connect	262,143,820	8		\$ 384,851	\$ 0.00147	\$ 48,168.93	\$ (384,851)	\$ -	\$ -	\$ -	\$ (384,851)	\$ -	\$ -	\$ -
Michigan Mines	n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a	n/a	
	<u>771,153,868</u>	<u>235,340</u>		<u>\$ 5,056,640</u>			<u>\$ (384,851)</u>	<u>\$ 5,056,640</u>			<u>\$ (384,851)</u>	<u>\$ 5,056,640</u>		

Proposed:

Customer Class	Proposed Rider Surcharge	Average Annual Cost	Total \$	% of 2020 revenue requirement
Residential	\$ 0.01821	\$ 16	\$ 3,400,932	67.3%
Class 1-2 Firm (Sales and Transport)	\$ 0.01094	\$ 49	\$ 1,073,976	21.2%
Class 1-2 Interruptible (Sales and Transport), Class 1-2 Ag Grain Dryer, and Class 1 Power Gen	\$ 0.01094	\$ 465	\$ 204,775	4.0%
Class 3-4 Firm (Sales and Transport)	\$ 0.00184	\$ 305	\$ 7,306	0.1%
Class 3-4 Interruptible (Sales and Transport) and Class 3-4 Ag Grain Dryer	\$ 0.00184	\$ 1,036	\$ 185,989	3.7%
Class 5, FLEX, Transport for Resale, and Class 2 Power Gen	\$ 0.00184	\$ 8,003	\$ 183,663	3.6%
Direct Connect	\$ -	\$ -	\$ -	0.0%
<b>Total</b>			<b>\$ 5,056,640</b>	<b>100%</b>

**NOTES**

**REVENUE APPORTIONMENT (EXCLUDING COST OF GAS) - Docket G011/GR-17-563**

	Revenue Apportionment
Residential	62.50%
Firm Sales	23.50%
Interruptible Sales	3.50%
Transport	10.50%
	<u>100.00%</u>

**SALES BY CLASS**

	2018 Forecast*	2020 Forecast	2018 Customer Count	2020 Customer Count
<b>Residential</b>	183,783,848	186,792,651	210,331	212,647
<b>Firm Sales</b>				
Class 1	9,082,832	9,369,628	9,093	9,345
Class 2	88,430,255	88,800,475	13,003	12,672.33
Class 3	3,963,107	3,979,699	24	24
Class 4	-	-	-	-
Class 5	-	-	-	-
	<u>101,476,194</u>	<u>102,149,802</u>	<u>22,120</u>	<u>22,042</u>
<b>Interruptible &amp; Joint Sales</b>				
Class 1	400,646	400,875	42	42
Class 2	15,846,069	15,855,124	366	359 ***
Class 3	17,218,410	17,228,250	63	63
Class 4	3,506,450	3,508,454	3	3
Class 5	-	-	-	-
	<u>36,971,575</u>	<u>36,992,703</u>	<u>474</u>	<u>467</u>
<b>Firm Transport</b>	-	-	-	-
<b>Interruptible &amp; Joint Transport</b>				
Class 1	-	-	-	-
Class 2	2,382,624	2,462,087	39	39
Class 3	56,768,957	58,662,264	103	100 ***
Class 4	21,202,228	21,909,346	14	14
Class 5	37,430,900	38,679,262	14	14
Power Generation	40,225,718	41,567,290	2	2
FLEX & Trans for Resale	19,155,776	19,794,642	7	7
Direct Connect**	253,683,205	262,143,820	8	8
<b>Total Transport</b>	<u>430,849,408</u>	<u>445,218,712</u>	<u>187</u>	<u>184</u>
<b>Sales Forecast</b>	<u><u>753,081,025</u></u>	<u><u>771,153,868</u></u>	<u><u>233,112</u></u>	<u><u>235,340</u></u>

	Current Revenue (excluding gas) (\$)	OAG's Proposed Revenue (excluding gas) (\$)	Percent of Revenue Requirement (excluding gas) (%)
Residential	68,043,217	70,038,600	62.5
Firm Sales	26,187,473	26,254,563	23.5
Interruptible Sales	3,843,986	3,860,043	3.5
Transport	9,111,319	11,774,733	10.5
<b>Total</b>	<u>107,185,995</u>	<u>111,927,939</u>	<u>100%</u>

--

\* Docket G011/GR-17-563 per "Attachment A\_Commission\_Rate\_Design.xlsx"

\*\*Based on 2018 Actual Sales per OAG-40 in the 2019 GUIC Rider Docket No. G011/M-19-281

\*\*\*Adjusted by a total of 10 in order to match forecasted total customer count for 2020 of 235,340 customers.

2020 Revenue Requirement for GUIC Rider - Farm Tap Phase II, Year 6

Line	Description	Reference	Forecasted Year		MN Jurisdiction Only						
			2018 Rate Case	6	Incremental Costs		Rate Case Apportionment		Proposed		
1	Depreciation Expense	See Note 1	\$ -	\$ 200,000	\$ 200,000		\$ 200,000		\$ 200,000		
2	Property Tax, Other Incremental O&M Expense		\$ -	\$ -	\$ -		\$ -		\$ -		
3	Rate Base	13-Month Average Net Plant Value	\$ -	\$ 9,000,000	\$ 9,000,000		\$ 9,000,000		\$ 9,000,000		
4	ADIT Proration Adjustment		\$ -	\$ -	\$ -		\$ -		\$ -		
5	Adjusted Rate Base	13-Month Average Net Plant Value	\$ -	\$ 9,000,000	\$ 9,000,000		9,000,000		9,000,000		
6	Rate of Return	Commission Authorized 2018 Rate Case			6.6971%		6.6971%		6.6971%		
7	Earnings on Rate Base	Line 5 x Line 6			\$ 602,739		\$ 602,739		\$ 602,739		
8	Gross Revenue Conversion Factor	2018 Rate Case Adjusted for Tax Reform			1.402		1.402		1.402		
9	Return on Rate Base	Line 7 x Line 8			\$ 845,040		\$ 845,040		\$ 845,040		
10											
11	Total Revenue Requirement	Line 1 + Line 2 + Line 9			\$ 1,045,040		\$ 1,045,040		\$ 1,045,040		
12											
13	Offsetting Project Revenue	See Note 2			\$ 46,499		\$ 46,499		\$ 46,499		
14											
15	2020 Annual Revenue Deficiency	Line 11 less line 13			\$ 998,541		998,541		998,541		
16											
17	Total Therms - MN Jurisdictional	See Note 3			771,153,868		771,153,868		771,153,868		
18											
19	Average Per Therm Increase	Line 17 / Line 19			\$ 0.00129		\$ 0.00129		\$ 0.00129		
					Rate/Therm	\$/Customer	Rate/Therm	\$/Customer	Rate/Therm	\$/Customer	
20	Residential				\$ 0.00129	\$ 1	\$ 0.00334	\$ 3	\$ 0.00360	\$ 3	
21	Class 1-2 Firm (Sales and Transport)				\$ 0.00129	\$ 6	\$ 0.00230	\$ 10	\$ 0.00216	\$ 10	
22	Class 1-2 Interruptible (Sales and Transport), Class 1-2 Ag Grain Dryer, and Class 1 Power Gen				\$ 0.00129	\$ 12	\$ 0.00029	\$ 12	\$ 0.00216	\$ 92	
23	Class 3-4 Firm (Sales and Transport)				\$ 0.00129	\$ 1,010	\$ 0.00230	\$ 381	\$ 0.00036	\$ 60	
24	Class 3-4 Interruptible (Sales and Transport) and Class 3-4 Ag Grain Dryer				\$ 0.00129	\$ 729	\$ 0.00029	\$ 163	\$ 0.00036	\$ 203	
25	Class 5, FLEX, Transport for Resale, and Class 2 Power Gen				\$ 0.00129	\$ 5,632	\$ 0.00029	\$ 1,261	\$ 0.00036	\$ 1,566	
26	Direct Connect				\$ 0.00129	\$ 42,430	\$ 0.00029	\$ 9,503	\$ -	\$ -	

Estimated Project Costs:  
\$ 9,622,045

	Capital Inv	Avg Capital	Depreciation	Net Capital
Year 0	0	0	0	0
Year 1	\$ 1,924,409	\$ 962,205	\$ 24,055	\$ 1,900,354
Year 2	\$ 1,924,409	\$ 2,862,558	\$ 71,564	\$ 3,753,199
Year 3	\$ 1,924,409	\$ 4,715,403	\$ 117,885	\$ 5,559,723
Year 4	\$ 1,924,409	\$ 6,521,927	\$ 163,048	\$ 7,321,084
Year 5	\$ 1,924,409	\$ 8,283,288	\$ 207,082	\$ 9,038,410
Year 6	0	\$ 9,038,410	\$ 225,960	\$ 8,812,450
Year 7	0	\$ 8,812,450	\$ 220,311	\$ 8,592,139
Year 8	0	\$ 8,592,139	\$ 214,803	\$ 8,377,335
Year 9	0	\$ 8,377,335	\$ 209,433	\$ 8,167,902
Year 10	0	\$ 8,167,902	\$ 204,198	\$ 7,963,705
Year 11	0	\$ 7,963,705	\$ 199,093	\$ 7,764,612
Year 12	0	\$ 7,764,612	\$ 194,115	\$ 7,570,497
Year 13	0	\$ 7,570,497	\$ 189,262	\$ 7,381,234
Year 14	0	\$ 7,381,234	\$ 184,531	\$ 7,196,703
Year 15	0	\$ 7,196,703	\$ 179,918	\$ 7,016,786
Year 16	0	\$ 7,016,786	\$ 175,420	\$ 6,841,366
Year 17	0	\$ 6,841,366	\$ 171,034	\$ 6,670,332
Year 18	0	\$ 6,670,332	\$ 166,758	\$ 6,503,574
Year 19	0	\$ 6,503,574	\$ 162,589	\$ 6,340,984
Year 20	0	\$ 6,340,984	\$ 158,525	\$ 6,182,460
Year 21	0	\$ 6,182,460	\$ 154,561	\$ 6,027,898
Year 22	0	\$ 6,027,898	\$ 150,697	\$ 5,877,201
Year 23	0	\$ 5,877,201	\$ 146,930	\$ 5,730,271
Year 24	0	\$ 5,730,271	\$ 143,257	\$ 5,587,014
Year 25	0	\$ 5,587,014	\$ 139,675	\$ 5,447,339
Year 26	0	\$ 5,447,339	\$ 136,183	\$ 5,311,155
Year 27	0	\$ 5,311,155	\$ 132,779	\$ 5,178,376
Year 28	0	\$ 5,178,376	\$ 129,459	\$ 5,048,917
Year 29	0	\$ 5,048,917	\$ 126,223	\$ 4,922,694
Year 30	0	\$ 4,922,694	\$ 123,067	\$ 4,799,627
Year 31	0	\$ 4,799,627	\$ 119,991	\$ 4,679,636
Year 32	0	\$ 4,679,636	\$ 116,991	\$ 4,562,645
Year 33	0	\$ 4,562,645	\$ 114,066	\$ 4,448,579
Year 34	0	\$ 4,448,579	\$ 111,214	\$ 4,337,364
Year 35	0	\$ 4,337,364	\$ 108,434	\$ 4,228,930
Year 36	0	\$ 4,228,930	\$ 105,723	\$ 4,123,207
Year 37	0	\$ 4,123,207	\$ 103,080	\$ 4,020,127
Year 38	0	\$ 4,020,127	\$ 100,503	\$ 3,919,624
Year 39	0	\$ 3,919,624	\$ 97,991	\$ 3,821,633
Year 40	0	\$ 3,821,633	\$ 95,541	\$ 3,726,092
Year 41	0	\$ 3,726,092	\$ 93,152	\$ 3,632,940
Year 42	0	\$ 3,632,940	\$ 90,823	\$ 3,542,116
Year 43	0	\$ 3,542,116	\$ 88,553	\$ 3,453,564
Year 44	0	\$ 3,453,564	\$ 86,339	\$ 3,367,224
Year 45	0	\$ 3,367,224	\$ 84,181	\$ 3,283,044

- Notes
- Assumes a depreciation rate of 0.025
  - This represents incremental customers and sales growth of 100 customers @ Farm Tap Residential Rate of \$9.50/month plus 1615 therms/year @ \$0.21733. Potentially an additional 240 customers could be added, but that assumes 100% participation regardless of cost - an unlikely outcome. The costs to serve the projected additional 100 customers, net of excess footage charges and customer contributions, are not included in the project revenue requirement.
  - Projected 2020 sales per MERC's 2018 filed rate case data in Docket No. G011/GR-17-563

2020 Revenue Requirement for GUIC Rider - Farm Tap Phase II, Year 6

Revenue Requirement: \$ 998,541

	Therm Sales	Customer Count	Rate Case Apportionment 1			
			Revenue Apportionment	Initial Apportionment	Rate/Therm	\$/Customer
Residential	186,792,651	212,647	62.5%	\$ 624,088	\$ 0.00334	\$ 2.93
Firm Sales	102,149,802	22,042	23.5%	\$ 234,657	\$ 0.00230	\$ 10.65
Interruptible Sales	36,992,703	467	3.5%	\$ 34,949	\$ 0.00094	\$ 74.84
Transport	124,600,988	153	10.5%	\$ 29,343	\$ 0.00024	\$ 191.78
Class 5, FLEX, Trans for Resale	58,473,904	21		\$ 13,770	\$ 0.00024	\$ 655.73
Direct Connect	262,143,820	8		\$ 61,734	\$ 0.00024	\$ 7,716.70
Michigan Mines	n/a	n/a	n/a	n/a		
	<u>771,153,868</u>	<u>235,338</u>		<u>\$ 998,541</u>		

	Therm Sales	Customer Count	Rate Case Apportionment 2				Option 1				Option 2			
			Revenue Apportionment	Initial Apportionment	Rate/Therm	\$/Customer	Redistribute	Apportionment	Rate/Therm	\$/Customer	Redistribute	Apportionment	Rate/Therm	\$/Customer
Residential	186,792,651	212,647	62.5%	\$ 624,088	\$ 0.00334	\$ 2.93	\$ 671,586	\$ 0.00360	\$ 3.16	\$ 671,586	\$ 0.00360	\$ 3.16		
Class 1-2 Firm (Sales and Transport)	98,170,103	22,018	23.5%	\$ 225,515	\$ 0.00230	\$ 10.25	\$ 242,679	\$ 0.00247	\$ 11.01	\$ 212,079	\$ 0.00216	\$ 9.63		
Class 3-4 Firm (Sales and Transport)	3,979,699	24		\$ 9,142	\$ 0.00230	\$ 381.39	\$ 9,838	\$ 0.00247	\$ 409.58	\$ 1,443	\$ 0.00036	\$ 59.70		
Class 1-2 Interruptible (Sales and Transport), Class 1-2 Ag Grain Dryer, and Class 1 Power Gen	18,718,087	440		\$ 5,426	\$ 0.00029	\$ 12.34	\$ 6,331	\$ 0.00034	\$ 14.46	\$ 40,437	\$ 0.00216	\$ 91.89		
Class 3-4 Interruptible (Sales and Transport) and Class 3-4 Ag Grain Dryer	101,308,314	180	14.0%	\$ 29,370	\$ 0.00029	\$ 163.22	\$ 34,268	\$ 0.00034	\$ 191.36	\$ 36,728	\$ 0.00036	\$ 202.62		
Class 5, FLEX, Transport for Resale, and Class 2 Power Gen	100,041,194	23		\$ 29,003	\$ 0.00029	\$ 1,261.39	\$ 33,839	\$ 0.00034	\$ 1,478.87	\$ 36,268	\$ 0.00036	\$ 1,565.86		
Direct Connect	262,143,820	8		\$ 75,997	\$ 0.00029	\$ 9,502.71	\$ (75,997)	\$ -	\$ -	\$ (75,997)	\$ -	\$ -		
Michigan Mines	n/a	n/a	n/a	n/a	n/a		n/a	n/a		n/a	n/a			
	<u>771,153,868</u>	<u>235,340</u>		<u>\$ 998,541</u>			<u>\$ (75,997)</u>	<u>\$ 998,541</u>		<u>\$ (75,997)</u>	<u>\$ 998,541</u>			

Proposed:

Customer Class	Proposed Rider Surcharge	Average Annual Cost	Total \$	% of 2020 revenue requirement
Residential	\$ 0.00360	\$ 3	\$ 671,586	67.3%
Class 1-2 Firm (Sales and Transport)	\$ 0.00216	\$ 10	\$ 212,079	21.2%
Class 1-2 Interruptible (Sales and Transport), Class 1-2 Ag Grain Dryer, and Class 1 Power Gen	\$ 0.00216	\$ 92	\$ 40,437	4.0%
Class 3-4 Firm (Sales and Transport)	\$ 0.00036	\$ 60	\$ 1,443	0.1%
Class 3-4 Interruptible (Sales and Transport) and Class 3-4 Ag Grain Dryer	\$ 0.00036	\$ 203	\$ 36,728	3.7%
Class 5, FLEX, Transport for Resale, and Class 2 Power Gen	\$ 0.00036	\$ 1,566	\$ 36,268	3.6%
Direct Connect	\$ -	\$ -	\$ -	0.0%
<b>Total</b>			<b>\$ 998,541</b>	<b>100%</b>

**NOTES**

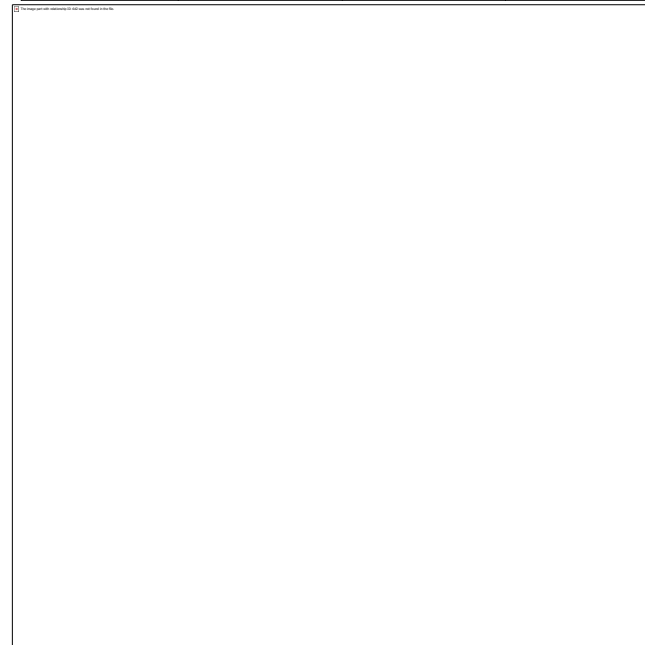
**REVENUE APPORTIONMENT (EXCLUDING COST OF GAS) - Docket G011/GR-17-563**

	Revenue Apportionment
Residential	62.50%
Firm Sales	23.50%
Interruptible Sales	3.50%
Transport	10.50%
	<u>100.00%</u>

**SALES BY CLASS**

	2018 Forecast*	2020 Forecast	2018 Customer Count	2020 Customer Count
<b>Residential</b>	183,783,848	186,792,651	210,331	212,647
<b>Firm Sales</b>				
Class 1	9,082,832	9,369,628	9,093	9,345
Class 2	88,430,255	88,800,475	13,003	12,672.33
Class 3	3,963,107	3,979,699	24	24
Class 4	-	-	-	-
Class 5	-	-	-	-
	<u>101,476,194</u>	<u>102,149,802</u>	<u>22,120</u>	<u>22,042</u>
<b>Interruptible &amp; Joint Sales</b>				
Class 1	400,646	400,875	42	42
Class 2	15,846,069	15,855,124	366	359 ***
Class 3	17,218,410	17,228,250	63	63
Class 4	3,506,450	3,508,454	3	3
Class 5	-	-	-	-
	<u>36,971,575</u>	<u>36,992,703</u>	<u>474</u>	<u>467</u>
<b>Firm Transport</b>	-	-	-	-
<b>Interruptible &amp; Joint Transport</b>				
Class 1	-	-	-	-
Class 2	2,382,624	2,462,087	39	39
Class 3	56,768,957	58,662,264	103	100 ***
Class 4	21,202,228	21,909,346	14	14
Class 5	37,430,900	38,679,262	14	14
Power Generation	40,225,718	41,567,290	2	2
FLEX & Trans for Resale	19,155,776	19,794,642	7	7
Direct Connect**	253,683,205	262,143,820	8	8
<b>Total Transport</b>	<u>430,849,408</u>	<u>445,218,712</u>	<u>187</u>	<u>184</u>
<b>Sales Forecast</b>	<u><u>753,081,025</u></u>	<u><u>771,153,868</u></u>	<u><u>233,112</u></u>	<u><u>235,340</u></u>

	Current Revenue (excluding gas) (\$)	OAG's Proposed Revenue (excluding gas) (\$)	Percent of Revenue Requirement (excluding gas) (%)
Residential	68,043,217	70,038,600	62.5
Firm Sales	26,187,473	26,254,563	23.5
Interruptible Sales	3,843,986	3,860,043	3.5
Transport	9,111,319	11,774,733	10.5
<b>Total</b>	<u>107,185,995</u>	<u>111,927,939</u>	<u>100%</u>



\* Docket G011/GR-17-563 per "Attachment A\_Commission\_Rate\_Design.xlsx"

\*\*Based on 2018 Actual Sales per OAG-40 in the 2019 GUC Rider Docket No. G011/M-19-281

\*\*\*Adjusted by a total of 10 in order to match forecasted total customer count for 2020 of 235,340 customers.







LVJ-NNG Transport - CIP Exempt	C&I JOINT Class 5 - CIP Exempt	24	24,813,170	552,000	\$	137,479	2	12,406,585	1,033,882	23,000
SLVI-NNG Transport-CIP Exempt	C&I INT Class 5 - CIP Exempt	169	223,134,374		\$	1,085,832	14	15,843,861	1,320,322	0
SLVI-NNG Transport-CIP Applicable	C&I INT Class 4	24	2,103,500		\$	109,492	2	1,051,750	87,646	0
SLVJ-NNG Transport-CIP Exempt	Power Generating Unit - Class 2 CIP Exempt	24	40,225,718	4,298,400	\$	302,060	2	20,112,859	1,676,072	179,100
Transport for Resale	Transport for Resale	12	206,679		\$	19,757	1	206,679	17,223	0
LVJ-NNG Flex Transport (Cust "A")	LVJ-NNG Flex Transport (Cust "A")	12	5,824,816	123,000	\$	209,360	1	5,824,816	485,401	10,250
LVI-NNG Flex Transport (Cust "B")	LVI-NNG Flex Transport (Cust "B")				\$	-	0	0	0	0
LVI-NNG Flex Transport (Cust "C")	LVI-NNG Flex Transport (Cust "C")				\$	-	0	0	0	0
LVI-NNG Flex Transport (Cust "D")	LVI-NNG Flex Transport (Cust "D")				\$	-	0	0	0	0
LVJ-NNG Flex Transport (Cust "E")	LVJ-NNG Flex Transport (Cust "E")	12	7,473,350	72,000	\$	120,289	1	7,473,350	622,779	6,000
LVJ-NNG Flex Transport (Cust "F")	LVJ-NNG Flex Transport (Cust "F")	36	4,563,375	144,000	\$	184,223	3	1,521,125	126,760	4,000
LVJ-NNG Flex Transport (Cust "G")	LVJ-NNG Flex Transport (Cust "G")	12	1,087,556	90,000	\$	47,350	1	1,087,556	90,630	7,500
<b>CONSOLIDATED TRANSPORT</b>										
SVI-CONSOLIDATED Transport	C&I INT Class 2	59	283,437		\$	41,133	5	57,648	4,804	0
SVI-CONSOLIDATED Transport	C&I INT Class 3	73	830,679		\$	101,519	6	136,550	11,379	0
LVI-CONSOLIDATED Transport	C&I INT Class 3	68	3,580,918		\$	359,924	6	631,927	52,661	0
LVI-CONSOLIDATED Transport	C&I INT Class 4	13	4,245,924		\$	209,136	1	3,919,314	326,610	0
SVJ-CONSOLIDATED Transport	C&I JOINT Class 2	197	1,269,335	119,820	\$	401,297	16	77,320	6,443	608
SVJ-CONSOLIDATED Transport	C&I JOINT Class 3	18	423,959	40,020	\$	81,765	2	282,639	23,553	2,223
LVJ-CONSOLIDATED Transport	C&I JOINT Class 3	131	13,402,164	410,040	\$	1,677,208	11	1,227,679	102,307	3,130
SLVJ-CONSOLIDATED Transport-CIP Exempt	C&I INT Class 5 - CIP Exempt	72	43,166,561	1,436,400	\$	266,734	6	7,194,427	599,536	19,950
<b>ALBERT LEA-NNG TRANSPORT</b>										
SVI-ALBERT LEA Transport	C&I INT Class 3	24	356,506		\$	41,261	2	178,253	14,854	0
LVI-ALBERT LEA Transport	C&I INT Class 3	24	1,760,778		\$	174,006	2	880,389	73,366	0
<b>Residential</b>		2,507,197	181,526,150	0	\$	81,017,998	\$	149,647,915		208,933
<b>Residential Farm Tap</b>		16,774	2,257,698	0	\$	1,039,354	\$	1,756,042		1,398
<b>Class 1</b>		107,672	8,807,698	0	\$	3,832,916	\$	7,730,813		8,973
<b>Class 1 Farm Tap</b>		1,439	275,134	0	\$	126,661	\$	213,783		120
<b>Class 1 Ag</b>		416	234,889	0	\$	86,181	\$	135,326		35
<b>Class 2 - FIRM</b>		153,601	85,386,635	0	\$	37,408,049	\$	58,713,719		12,801
<b>Class 2 Farm Tap</b>		2,423	3,043,620	0	\$	1,401,161	\$	2,023,259		202
<b>Class 2 Ag</b>		480	2,024,493	5,460	\$	719,516	\$	918,402		40
<b>Class 2 - Int</b>		4,382	16,204,200	215,991	\$	4,837,994	\$	7,213,121		365
<b>Class 3 - FIRM</b>		284	3,963,107	0	\$	1,773,359	\$	2,313,744		24
<b>Class 3 Ag</b>		12	1,604,084	0	\$	-	\$	97,779		1
<b>Class 3 - Interr</b>		1,978	72,383,283	1,088,946	\$	6,093,210	\$	14,425,023		165
<b>Class 4 - Interr</b>		205	24,708,678	120,483	\$	1,007,964	\$	2,269,465		17
<b>Class 5 - Interr</b>		265	291,114,105	1,988,400	\$	-	\$	1,490,045		22
<b>Power Generating 1</b>		84	165,757	0	\$	61,012	\$	81,290		7
<b>Power Generating 2</b>		24	40,225,718	4,298,400	\$	-	\$	302,060		2
<b>FLEX &amp; Transport for Resale</b>		84	19,155,776	429,000	\$	-	\$	580,978		7
<b>Total</b>		<b>2,797,320</b>	<b>753,081,025</b>	<b>8,146,680</b>	<b>\$</b>	<b>139,405,374</b>	<b>\$</b>	<b>249,912,765</b>		<b>233,112</b>

Opt Out

338,813,173



The Office of  
**Minnesota Attorney General Keith Ellison**  
helping people afford their lives and live with dignity and respect • [www.ag.state.mn.us](http://www.ag.state.mn.us)

September 14, 2020

Mr. Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

**Re: *In the Matter of a Petition of Minnesota Energy Resources Corporation for Approval of Farm Tap Customer-Owned Fuel Line Replacement Plan, Tariff Amendments, and Deferred Accounting***  
**MPUC Docket No. G-011/M-17-409**

Dear Mr. Seuffert:

Enclosed and e-filed in the above-referenced matter please find Comments of the Minnesota Office of the Attorney General—Residential Utilities Division.

By copy of this letter all parties have been served. A Certificate of Service is also enclosed.

Sincerely,

/s/ **Peter G. Scholtz**

---

PETER G. SCHOLTZ

Assistant Attorney General

(651) 757-1473 (Voice)

(651) 296-9663 (Fax)

[peter.scholtz@ag.state.mn.us](mailto:peter.scholtz@ag.state.mn.us)

Enclosure

**CERTIFICATE OF SERVICE**

**Re: *In the Matter of a Petition of Minnesota Energy Resources Corporation for Approval of Farm Tap Customer-Owned Fuel Line Replacement Plan, Tariff Amendments, and Deferred Accounting***  
**MPUC Docket No. G-011/M-17-409**

I, JUDY SIGAL, hereby certify that on the 14th day of September, 2020, I e-filed with eDockets *Comments of the Minnesota Office of the Attorney General—Residential Utilities Division* and served a true and correct copy of the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

*/s/ Judy Sigal*  
\_\_\_\_\_  
JUDY SIGAL

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_17-409_M-17-409
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_17-409_M-17-409
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_17-409_M-17-409
Daryll	Fuentes	dfuentes@usg.com	USG Corporation	550 W Adams St Chicago, IL 60661	Electronic Service	No	OFF_SL_17-409_M-17-409
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-409_M-17-409
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-409_M-17-409
Catherine	Phillips	Catherine.Phillips@weceenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_17-409_M-17-409
J. Gregory	Porter	greg.porter@nngco.com	Northern Natural Gas Company	1111 South 103rd St Omaha, NE 68124	Electronic Service	No	OFF_SL_17-409_M-17-409
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_17-409_M-17-409
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_17-409_M-17-409

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Colleen	Sipiorski	Colleen.Sipiorski@wecenergygroup.com	Minnesota Energy Resources Corporation	700 North Adams St Green Bay, WI 54307	Electronic Service	No	OFF_SL_17-409_M-17-409
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-409_M-17-409
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_17-409_M-17-409
Mary	Wolter	mary.wolter@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_17-409_M-17-409