



Minnesota Energy Resources Corporation
2685 145th Street West
Rosemount, MN 55068
www.minnesotaenergyresources.com

August 21, 2025

Mr. Mike Bull
Acting Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101

VIA ELECTRONIC FILING

Re: In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of the 2024 Energy Conservation and Optimization Tracker Account, Demand-Side Management Financial Incentive, and Conservation Cost Recovery Adjustment Factor

Docket No. G011/M-25-46

Reply Comments of Minnesota Energy Resources Corporation

Dear Mr. Seuffert:

On August 14, 2025, the Minnesota Department of Commerce, Division of Energy Resources (the "Department") filed Comments in the above-referenced docket recommending approval of Minnesota Energy Resources Corporation's ("MERC" or the "Company") Petition. In particular, the Department recommended the Commission take the following action:

- A.1. Approve a DSM financial incentive of \$998,125 for 2024 ECO activities;
- A.2. Approve MERC's 2024 ECO tracker account, as summarized in Table 3 above, resulting in a December 31, 2024 tracker balance of \$50,592;
- A.3. Approve a Conservation Cost Recovery Adjustment of \$0.00638 per therm to be effective January 1, 2026, or the first month following the Commission's Order in this proceeding;
- A.4. Approve the Company's proposed bill message in the billing month immediately following the date of the Commission's Order:

Effective January 1, 2026, the CCRA (conservation cost recovery adjustment) has been revised to \$0.00638 per therm. The CCRA is an annual adjustment to true-up under-recovery or over-recovery of CIP (conservation improvement program) expenses.

- A.5. Require MERC to submit a compliance filing within 10 days of the issue date of the Order in the present docket with revised tariff sheets reflecting the Commission's determinations in this matter.

MERC thanks the Department for its review and analysis and is in agreement regarding the Department's recommendations with one minor clarification, that the new CCRA rate be

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effective January 1, 2026 or the first billing cycle in the month following the issue date of the Commission's order in this docket, whichever is later. As reflected in the Petition, MERC calculates its revised CCRA rate based on an effective period of January 1 through December 31, such that the current CCRA rate will remain in effect through the end of 2025, and the new rate would be implemented effective January 1, 2026.

Based on the foregoing, MERC respectfully requests that the Commission approve its 2024 DSM financial incentive, 2024 ECO tracker account activity, and revised CCRA rate of \$0.00638 per therm, consistent with the Department's recommendations and clarification above.

Please contact me at (414) 221-4208 if you have any questions regarding this filing.

Sincerely,

A handwritten signature in dark ink, reading "Joylyn C. Hoffman Malueg". The signature is fluid and cursive, with the first name "Joylyn" being the most prominent.

Joylyn C. Hoffman Malueg
Senior Project Specialist
Minnesota Energy Resources Corporation

cc: Service Lists

In the Matter of the Petition of Minnesota
Energy Resources Corporation for Approval
of the 2024 Energy Conservation and
Optimization Tracker Account, Demand-Side
Management Financial Incentive, and
Conservation Cost Recovery Adjustment
Factor

Docket No. G011/M-25-46

CERTIFICATE OF SERVICE

I, Kristin M. Stastny, hereby certify that on the 21st day of August, 2025, on behalf of Minnesota Energy Resources Corporation (MERC), I electronically filed a true and correct copy of the enclosed 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 lists.

Dated this 21st day of August, 2025.

/s/ Kristin M. Stastny
Kristin M. Stastny

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Julie	Ambach	juliea@cmmmpa.org	Shakopee Public Utilities		255 Sarazin St Shakopee MN, 55379 United States	Electronic Service		No	M-25-46
2	Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company		PO Box 351 200 1st St SE Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	M-25-46
3	Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-46
4	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	M-25-46
5	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-46
6	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	M-25-46
7	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-25-46
8	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	M-25-46
9	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-25-46
10	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	M-25-46

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12	Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.		823 E 7th St St. Paul MN, 55106 United States	Electronic Service		No	M-25-46
13	Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.		2377 Union Lake Trl Northfield MN, 55057 United States	Electronic Service		No	M-25-46
14	Melissa S	Feine	melissa.feine@semcac.org	SEMCAC		PO Box 549 204 S Elm St Rushford MN, 55971 United States	Electronic Service		No	M-25-46
15	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-25-46
16	Karolanne	Foley	karolanne.foley@dairylandpower.com	Dairyland Power Cooperative		PO Box 817 La Crosse WI, 54602-0817 United States	Electronic Service		No	M-25-46
17	Tyler	Glewwe	tyler.glewwe@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-46
18	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	M-25-46
19	Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-46
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22	Joylyn C	Hoffman Malueg	joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources		2685 145th St W Rosemount MN, 55068 United States	Electronic Service		No	M-25-46
23	Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency		702 3rd Ave S Virginia MN, 55792 United States	Electronic Service		No	M-25-46
24	Martin	Kapsch	martin.kapsch@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-46
25	Deborah	Knoll	dknoll@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-46
26	Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas		null null, null United States	Electronic Service		No	M-25-46
27	Tina	Koecher	tkoecher@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	M-25-46
28	Martin	Lepak	martin.lepak@aeoa.org	Arrowhead Economic Opportunity		702 S 3rd Ave Virginia MN, 55792 United States	Electronic Service		No	M-25-46
29	Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission		1902 6th Ave E Hibbing MN, 55746 United States	Electronic Service		No	M-25-46
30	Josh	Mason	jmason@rpu.org	Rochester Public Utilities		4000 E River Rd NE Rochester MN, 55906 United States	Electronic Service		No	M-25-46
31	Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company		4902 N Biltmore Ln PO Box 77007 Madison WI, 53707-1007 United States	Electronic Service		No	M-25-46
32	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	M-25-46
33	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-46
34	Carl	Nelson	cnelson@mncee.org	Center for Energy and		212 3rd Ave N Ste 560	Electronic Service		No	M-25-46

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				Environment		Minneapolis MN, 55401 United States				
35	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	M-25-46
36	Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	M-25-46
37	Bill	Poppert	info@technologycos.com	Technology North		2433 Highwood Ave St. Paul MN, 55119 United States	Electronic Service		No	M-25-46
38	Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024-9583 United States	Electronic Service		No	M-25-46
39	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-25-46
40	Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		No	M-25-46
41	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	M-25-46
42	Rick	Sisk	rsisk@trccompanies.com	Lockheed Martin		1000 Clark Ave, St. Louis MO, 63102 United States	Electronic Service		No	M-25-46
43	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	M-25-46
44	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617	Electronic Service		No	M-25-46

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45	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-46
46	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-25-46
47	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-46
48	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	M-25-46
49	Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-46
50	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	M-25-46

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2	Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company		PO Box 351 200 1st St SE Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
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14	Melissa S	Feine	melissa.feine@semcac.org	SEMCAC		PO Box 549 204 S Elm St Rushford MN, 55971 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
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44	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
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