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August 1, 2025

**VIA ELECTRONIC FILING**

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

Re: In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers  
Docket No. G-999/CI-21-135

In Matter of the Petition of Minnesota Energy Resources Corporation for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions Docket No. G011/CI-21-611

**Minnesota Energy Resources Corporation Compliance Filing**

Dear Mr. Bull:

Minnesota Energy Resources Corporation (“MERC” or the “Company”) submits this Compliance Filing pursuant to the Minnesota Public Utilities Commission’s (the “Commission”) February 17, 2023, Order Requiring Actions to Mitigate Impacts from Future Natural Gas Spikes, Setting Filing Requirements, and Initiating a Proceeding to Establish Gas Resource Planning Requirements (the “February 2023 Order”) in the above-referenced dockets, and June 2, 2025, Order Approving Filings and Requiring Notification of Pricing Event (the “June 2025 Order”) in the above-referenced dockets.

The February 2023 Order requires MERC to make an annual compliance filing by August 1st of each year “that details its recent efforts [in its natural gas supply procurement practices] and addresses parties’ recommendations made in this proceeding.”<sup>1</sup> MERC provides updates addressing parties’ recommendations below.

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<sup>1</sup> February 2023 Order Point 15: By August 1 of each year, each gas utility in this docket must make an annual compliance filing that details its recent efforts and addresses parties’ recommendations made in this proceeding.

The Commission's Order Points 2, 9 and 10<sup>2</sup> from the February 2023 Order are not addressed in this filing. The information for these Order Points have been, or will be, provided by the Company in other dockets, such as rate cases and demand entitlement filings.

The June 2025 Order requires MERC to provide additional reporting requirements in future August 1st compliance filings, and to continue reporting on February 2023 Order Points 3, 5-11, and 14-15 in future August 1st compliance filings.<sup>3</sup> MERC provides updates on the additional reporting requirements below. Additionally, the Commission's June 2025 Order at Order Point 9, modified Order Point 3 from the February 2023 Order, which MERC has updated in the reporting requirements below.

***February 2023 Order Point 3. If a gas utility in this docket pays prices on the daily spot market that exceed five times the average prices of gas in the utility's filed purchased-gas adjustment for the current month when the gas was purchased, the utility shall make a filing to the Commission within 14 days following the last day of the price event identifying its costs for procuring gas for Minnesota customers while gas prices were inflated above this amount, what actions the utility took to account for or mitigate those costs, and justifications for why its actions were prudent.***

MERC did not pay prices on the daily spot market that exceeded five times the average prices of the Company's filed purchased gas adjustment ("PGA") for the current month when gas was purchased.

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<sup>2</sup> February 2023 Order Point 2: No later than its next rate case, each gas utility in this docket shall update its existing interruptible tariffs to ensure customers understand the possibility of economic interruptions and propose new or alternative interruptible tariffs that include additional economic curtailment provisions that could protect the system from future price spikes. Accordingly, MERC will provide this information no later than its next general rate case filing.

February 2023 Order Point 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. Consistent with the Order Point language, MERC provides this information in its Demand Entitlement dockets.

February 2023 Order Point 10: Each gas utility in this docket shall include in its relevant annual, forward-looking gas planning or hedging filings: its expected supply mixes across different load and weather conditions throughout each month of the upcoming winter season, the forecasted minimum, average, and maximum day load requirements, the expected mix of baseload, storage, and spot supply on those days. MERC provides this information in its Demand Entitlement dockets.

<sup>3</sup> The June 2025 Order, at Order Point 8, relieved the Gas Utilities of future reporting on February 2023 Order Point 4, which required "the gas utilities in this docket shall participate in the North American Energy Standards Board Gas/Electric Harmonization Forum and other relevant efforts to track and pursue beneficial reforms, such as improving the force majeure language in the NAESB standard contract." The February 2023 Order Point 14 does not apply to MERC, and February 2023 Order Point 15 requires each gas utility to make this August 1st compliance filing.

***February 2023 Order Point 5. The gas utilities in this docket shall continue exploring the availability and cost of contracting, hedging, and supply options that would provide better protection against price spikes.***

The Company has reviewed its gas contracting, purchasing, hedging, storage, peak-shaving,<sup>4</sup> and other relevant practices and implemented the following improvements and modifications to its practices to provide additional protection to customers from extraordinary natural gas spikes in the future.

Gas Contracting

In 2022 and 2023, MERC participated in the North American Energy Standards Board (NAESB) Gas/Electric Harmonization Forum. Despite a set of recommendations for consideration to the stake holders, no consensus occurred. As a result, no meaningful changes to these contracts has occurred. MERC will continue to monitor and participate in future actions on this topic.

MERC relies on NAESB contracts with its suppliers. These agreements provide contract protection consistent with industry standards. MERC did not identify any modifications that could be reasonably or cost-beneficially incorporated into these agreements at this time, but will continue to evaluate whether any contract modifications could be incorporated in the future.

For all gas supply purchases that have a term of one month or greater, a request for proposal (“RFP”) letter and bid form are sent to all suppliers that have an executed NAESB agreement with MERC. MERC continuously seeks opportunities to solicit additional suppliers in order to increase diversity of its natural gas supply for customers. The RFP letter describes the products, locations, price indices (e.g., first-of-month (“FOM”)<sup>5</sup>, Gas Daily Daily (“GDD”)<sup>6</sup>, etc.). MERC requests suppliers submit bids by a

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<sup>4</sup> MERC does not have peak shaving resources available but, as discussed below, has undertaken a further evaluation regarding the feasibility of incorporating peak shaving resources into the Company’s distribution system.

<sup>5</sup> Index that is published by Platts’ Inside FERC (“Inside FERC”) or Natural Gas Intelligence (“NGI”) publications. The FOM index represents the average of reported fixed-price deals over the last five business days of the month for delivery of gas the following month. The FOM index is typically published on the first business day of the month in which the index is representing the flow of gas. The index represents a “market average price.” There is a specific index for each trading hub with liquid transactions.

<sup>6</sup> Index that is published by S&P Global’s Platts (“Platts”). Platts Gas Daily indices are based upon trade data reported to Platts by market participants and the Intercontinental Exchange for natural gas transactions. The indices are calculated using detailed transaction level data from these participants. Platts editors screen the data for outliers that may be further examined and potentially removed. A volume weighted average is then calculated from the remaining set of data. The daily price index represents the average of reported fixed-price deals for next day delivery and is typically distributed the

specific date and time. All bids are analyzed to maximize customer value based on reliability, need, supply diversity, price, term, location, and quantity before contracts are awarded.

In recent winter heating seasons, MERC has issued RFPs to roughly 60 suppliers, seeking bids on over 30 products. As part of this process, MERC issued RFPs to obtain information as to availability and pricing for additional products that could provide greater protection for customers against the impacts of future price spikes. For example, MERC requested bids on call options priced at the FOM index in addition to those priced off of daily pricing. Such a product provides the Company with flexibility to call on gas supplies when needed, minimizing the exposure to the volatility of the daily market. Since the winter of 2020-2021, MERC had received only a small number of bids / quotes for this specific type of product, which have been quite costly and therefore not beneficial to customers. MERC will continued to request this product

For the 2025-2026 winter heating season, MERC issued several RFPs as part of an Asset Management Agreement (“AMA”) that includes capacity releases and call options that have traditionally been based on daily prices, but were requested to be based on FOM. Despite there being minimal interest in FOM call products in past years, MERC was able to execute two agreements that includes FOM call supply at several Northern Border Pipeline and Northern Natural Gas interconnects, for the 2025-2026 winter heating season. These significantly reduce the risk of daily price spikes. MERC will continue to solicit these products as well as explore other physical products that contribute to protecting customers from daily price spikes.

### Hedging

MERC’s purpose with respect to hedging is to mitigate price volatility for a portion of MERC’s supply at a cost that still allows the Company to provide reasonably priced natural gas.

MERC’s hedging activities are subject to significant oversight, regular review, and Commission requirements designed to enable the Company to utilize effective hedging tools to mitigate expected price volatility risk while recognizing that such instruments come at a cost to customers (the premium paid to acquire the instruments). The Commission has authorized the Company to hedge “contingent upon MERC only using financial hedging instruments for risk hedging on behalf of ratepayers and not for speculation.”<sup>7</sup> Approval of hedging is limited to specified hedging instruments, subject

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night before the day gas is to flow (for weekends and holidays, there is one index set on the last business day prior to the group of non-business days to which the index is applicable).

<sup>7</sup> *In the Matter of the Petition of Minnesota Energy Resources Corporation for Extension of Rule Variances to Recover the Costs of Financial Instruments through the Purchased Gas Adjustment*, Docket

to a cap of 30 percent of MERC's total projected heating season sales volumes, and subject to various review and reporting requirements.

MERC's hedging strategy covers approximately 30 percent of normal expected winter volumes through financial instruments – approximately 10 percent futures and 20 percent options. While prices have been relatively stable the past few years, forward winter prices remain high resulting in the strike price of purchased call options to be high as well.

MERC will continue to utilize financial futures and financial call options, as part of its hedging portfolio. MERC also continues to review the availability of other products (for example, summer-priced winter delivery supply, incremental storage, etc.) that could be implemented to help hedge against winter price spikes. MERC routinely explores available financial and physical products to provide protection from price and deliverability risks, and will continue to evaluate whether products that may be offered in the future could provide additional protection for customers from future extraordinary price increases.

### Peak Shaving

MERC has been reviewing the feasibility of including peak shaving as part of its gas supply portfolio. The Company determined that it would not be feasible to incorporate peak shaving resources at most locations on the Company's distribution system due to limitations on customer demand and limitations for moving peak shaving supplies to other areas of the distribution system. While the Rochester area might have sufficient customer demand to support peak shaving, because MERC continues to have excess capacity reserve margins for pipeline capacity serving Rochester, the addition of peak shaving is not needed at this time. MERC has identified that the Farmington area is in need of increased deliverability of supply. Peak Shaving has been explored as part of the solution to the forecasted need but due to cost and operational restrictions, has been deemed infeasible. The Company intends to provide more in depth information on this finding in its August 1, 2025 Demand Entitlement Filing for its NNG System to the Commission.

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No. G011/M-20-833, Order (Apr. 9, 2021) (agreeing with and adopting the recommendations of the Department attached to and incorporated into the Order, including the recommending that "MERC only use financial instruments for risk hedging on behalf of ratepayers and not for speculation").

**February 2023 Order Point 6. The gas utilities in this docket shall consider variations to, and explain their plans to, incorporate a greater degree of baseload purchases.**

Since the 2020-2021 winter season, MERC has increased its baseload volumes in an effort to minimize its exposure to daily prices. MERC contracted for roughly 20 percent more baseload in 2025-2026 than in 2020-2021.

Further protection from daily prices has been attained with contracting for monthly-priced supply calls as part of AMAs, beginning in 2023-2024, and increasing in percentage for the upcoming 2025-2026 winter heating season.

Overall, MERC has been consistently able to reduce its exposure to daily prices, as can be seen in the below table, which represents the percentage of gas by supply type, on a design day:

MERC Total Supply Mix	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26
Daily Priced	27%	21%	17%	11%	11%	7%
Monthly Priced	35%	42%	45%	51%	51%	55%
Storage	38%	38%	38%	38%	38%	37%

While MERC has been successful in reducing the exposure to daily prices, it continues to look at variations of supply mix that minimize exposure to daily prices while also contracting for a volume of supply that ensures adequate, reliable supply to meet the Company's demand.

**February 2023 Order Point 7. The gas utilities in this docket shall explore modifications to storage inventory management that could preserve withdrawal capabilities for later in the winter.**

MERC utilizes storage to provide natural gas deliverability during periods of high demand and for operational flexibility in balancing the system. In addition to operational benefits, storage provides a physical price hedge for customers by reducing the amount of gas purchased in the winter and by purchasing in the summer for delivery at a later date.

MERC has pipeline storage contracts with ANR Pipeline Company ("ANR") and NNG. The ANR storage is only deliverable to the Company's Consolidated PGA system, while the NNG storage is only deliverable to customers served by MERC's NNG PGA system.

On the Consolidated PGA system, MERC increased its ANR storage by 5,000 Dth/day, effective April 1, 2022.<sup>8</sup> MERC's ANR storage contract is a ratcheted service and provides for a maximum storage quantity of 1,004,700 Dth and a maximum daily withdrawal of 20,094 Dth/day.<sup>9</sup>

On the NNG PGA system, NNG's contracted storage capacity is currently fully subscribed. If additional storage becomes available, MERC will evaluate the viability and cost-effectiveness for customers within the gas supply portfolio.

MERC was able to come to an agreement with a counterparty to acquire its NNG storage service on a permanent basis, beginning in the 2023-24 heating season. Prior to that, MERC negotiated this storage capacity via short-term capacity releases. MERC's acquiring the storage capacity on a permanent basis protects the storage rights for the benefit of customers long-term.

MERC continues to look for other potential storage options that could be incorporated into the Company's gas supply portfolio to serve customers at a reasonable cost on the NNG or Consolidated PGA systems.

***February 2023 Order Point 8. The gas utilities in this docket shall commit to improving their supply reserve margin practices to minimize these quantities to the greatest extent reasonable and be prepared to explain the level of their supply reserve margins in the future.***

MERC was able to enhance its forecasting practice by isolating the large electric generation demand from the overall system demand. This allows for less uncertainty of Transportation deliveries and of the impact of the electric generation demand. Eliminating this variability allows MERC to better align supplies to demand forecasts and minimize the potential purchase of daily priced gas during price spike periods.

There are, of course, other variables that come into play for daily operation concerns. Pipeline deliverability issues, production problems, and freeze-offs are just a few items that may be present on severe weather days, and are considered when determining the daily supply reserve margin.

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<sup>8</sup> See *Minnesota Energy Resources Corporation's Petition for Approval of a Change in Demand Entitlement for its Consolidated System*, Docket No. G011/M-22-423 (Aug. 1, 2022).

<sup>9</sup> A ratchet is when the withdrawal rights are reduced from the maximum storage withdrawal capability based on either volume or date.

***February 2023 Order Point 11. The gas utilities in this docket shall design plans that study customer responses to conservation calls.***

In accordance with Order Point 11<sup>10</sup>, MERC conducted a survey in 2024 of firm system sales commercial and industrial (“C&I”) customers’ reaction to conservation calls. The survey confirmed the situational trend and usage pattern of C&I customers; while C&I firm system sales customers were very willing to reduce their usage via reducing their thermostat, far fewer C&I customers were willing to reduce energy usage attributable to production or business activities. While C&I customers would be willing to conserve, these customers are dependent upon natural gas usage for their business and production activities, therefore a call for conservation of C&I firm system sales customers may not achieve a significant reduction in natural gas usage.

The Company continues to have in place a Gas Price Spike Customer Communications Plan. The details of that Communications Plan was filed with the Commission on August 30, 2021 in Docket Nos. G999/CI-21-135 and G011/CI-21-611.

MERC notes that voluntary conservation requests have significant limitations in terms of gas supply planning and cost mitigation, especially under circumstances similar to those experienced during Winter Storm Uri in February 2021. For example, if MERC reduced its daily gas purchases and ended up short, pipeline penalties could significantly exceed avoided gas costs.

***June 2025 Order Point 6. The gas utilities must include in future August compliance filings a report on how they are improving incorporation of curtailment calls into their gas supply planning processes for both reliability and economic purposes.***

Prior to each winter season, MERC performs a design day forecast for its interruptible customers, by pipeline region. As potential for severe weather comes into view, MERC assesses several variables including pipeline declarations, anticipated or communicated supply cuts, national and local weather, and market prices among other variables.

MERC’s daily gas supply planning begins the early morning on the day prior to the day of gas flow, with a total system forecast, including transportation customers, firm sales customers, and interruptible sales customers. MERC considers how much gas supply the transportation customers are expected to bring into MERC’s system in order to derive the system’s remaining supply needs.

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<sup>10</sup> *February Order Point 11: The gas utilities in this docket shall design plans that study customer responses to conservation calls.*

If the forecast results in a determination that incremental daily priced supply is needed, MERC has until 8:15 a.m. on that day (i.e. the day *prior* to the gas flowing, which is by 8:15 a.m. on a Friday for the Saturday through Monday time period, or Saturday through Tuesday when there is a Monday holiday) to decide if it will execute any of its daily supply calls. As part of that evaluation, MERC considers market prices at the supply basin(s) from which gas would be procured. If the market is showing indications of a price spike<sup>11</sup>, MERC would also strongly consider implementing curtailment calls for economic purposes to interruptible system sales customers to help mitigate, or potentially eliminate, the need to make daily-priced purchases.

At any point in time, if there are reliability concerns as a result of supply cuts or disruptions occurring from the interstate pipelines, or system pressure issues, MERC evaluates the impact that a curtailment call would have on the situation, based on the information MERC has at that time. If a curtailment will help the reliability concern, MERC will issue a curtailment call to interruptible system sales customers (and potentially interruptible transportation customers) for reliability purposes.

***June 2025 Order Point 7. The gas utilities must report, in future August compliance filings, on how they are improving interruptible customer compliance with curtailment orders.***

The Company communicates expectations around curtailment obligations to interruptible customers in the form of an annual letter, to which interruptible customers verify that they understand the terms and conditions of interruptible service, and confirm their key personnel's contact information. MERC also conducts an annual test of its Customer Notification System ("CNS") to verify the interruptible customers contact information is correct and the system is operating properly.

The Company also ensures there are open communication channels with interruptible customers, especially in instances where interruptible customers are no longer eligible for interruptible service. For example, MERC has had instances where interruptible customers remove their standby facilities and/or no longer have the ability to adhere to curtailment calls and incorrectly remain on interruptible service. In these instances, MERC ensures that the customer is promptly removed from interruptible service and placed on the proper rate schedule.

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<sup>11</sup> The Company notes that assessing price signals at that point in time can be challenging as there is significant price uncertainty during severe weather periods and prices become more certain later in the morning after 8:15 a.m.

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MERC does not have concerns with its interruptible customers complying with curtailment calls, nor has recent data analyzed by MERC shown that the Company's interruptible customers do not comply with those curtailments when they occur. The Company has not had any situations of curtailment noncompliance from interruptible customers in the past five years. The Company views its current processes and communications with interruptible customers regarding curtailment expectations to be effective and a contributing factor in customer compliance.

DATED August 1, 2025

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Richard F. Stasik".

Richard F. Stasik  
Director—State Regulatory Affairs

cc: Service List

In the Matter of a Commission Investigation  
into the Impact of Severe Weather in February  
2021 on Impacted Minnesota Natural Gas  
Utilities and Customers

Docket No. G-999/CI-21-135

CERTIFICATE OF SERVICE

I, Colleen T. Sipiorski, hereby certify that on the 1st day of August, 2025, on behalf of Minnesota Energy Resources Corporation (MERC), I electronically filed Compliance Filing of Minnesota Energy Resources Corporation on [www.edockets.state.mn.us](http://www.edockets.state.mn.us). Said documents were also served via U.S. mail and electronic service as designated on the attached service list.

Dated this 1st day of August, 2025

/s/ Colleen T. Sipiorski

Colleen T. Sipiorski

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