MINNESOTA DEPARTMENT OF COMMERCE

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July 31, 2014

Burl W. Haar
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, Division of Energy Resources**
Docket No. G001/M-14-560

Dear Dr. Haar:

Attached are the *Comments* of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

> A request by Interstate Power and Light Company (Interstate, IPL, or the Company) for approval by the Minnesota Public Utilities Commission (Commission) of a change in demand entitlement units effective November 1, 2014.

The filing was submitted on July 1, 2014. The petitioners are:

Paula N. Johnson
Senior Attorney—Regulatory
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The Department recommends that the Commission **approve** Interstate's proposed level of demand entitlement and **allow** IPL to recover associated demand costs through the monthly Purchased Gas Adjustment effective November 1, 2014.

The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ ADAM J. HEINEN
Rates Analyst
651-539-1825

AJH/ja
Attachment

MINNESOTA DEPARTMENT OF COMMERCE

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE MINNESOTA DEPARTMENT OF COMMERCE DIVISION OF ENERGY RESOURCES

DOCKET NO. G001/M-14-560

I. SUMMARY OF THE COMPANY'S PROPOSAL

Pursuant to Minnesota Rules 7825.2910, subpart 2, on July 1, 2014 Interstate Power and Light Company (Interstate, IPL, or the Company) filed a proposal to change its demand entitlements (*Petition)* effective November 1, 2014.

Interstate does not propose changes to the overall level of entitlements in this *Petition*. The Company stated that the contributing factor for the filing is the revision in demand levels related to changes in IPL's contract with Northern Natural Gas (Northern). The Company did not explicitly note it in the filing, but it appears that the revision in volumes is related to the Northern TF-12 split that may occur at a later date; as such, Interstate anticipates making a supplemental filing on, or about, November 1, 2014. It is important to note that if a TF-12 split revision occurs, it will only impact how these associated volumes are billed, and will have no impact on the overall level of demand entitlements.

Even though Interstate does not propose changes in its total entitlement level, the Company's proposal does include an updated design-day analysis, which results in a change in the projected design day. The Company's proposal would decrease the Company's proposed design-day level by 120 Dekatherms (Dkt)/day from 13,035 Dkt/day to 12,915 Dkt/day. The total entitlement level of 14,219 Dkt/day remains unchanged from the level approved in last year's demand entitlement filing.[1]

Since the Company does not propose a change in overall entitlement levels, and the potential TF-12 split remains unresolved, there is no request for a change in rates to customer classes at this time. The Minnesota Department of Commerce, Division of Energy Resources (Department) will discuss any proposed rate changes, if applicable, after Interstate makes its supplemental filing on, or about, November 1, 2014.

[1] February 5, 2014 *Order* in Docket No. G001/M-13-579.

II. THE DEPARTMENT'S ANALYSIS OF THE COMPANY'S PROPOSAL

The Department's analysis of the Company's request includes the following sections:

- the proposed overall demand entitlement level;
- the design-day requirement;
- the reserve margin; and
- the PGA cost recovery proposal.

A. THE COMPANY'S DEMAND ENTITLEMENT LEVEL

1. Proposed Overall Demand Entitlement Level

As indicated in Department Attachment 1, the Company did not propose changes to its overall entitlement level compared to last heating season's total entitlement level.

Previous Entitlement (Dkt/day)	Proposed Entitlement (Dkt/day)	Entitlement Changes (Dkt/day)	% Change From Previous Year
14,219	14,219	0	0%

The Department analyzes below the proposed design day requirement and the proposed reserve margin. The Department also concludes that the Company's proposed recovery of overall demand costs is reasonable.

2. Design-Day Requirement

Interstate used a design-day that is largely identical to what it used in its previous demand entitlement filing. The Department identified two minor changes, beyond updated data, that IPL made to its design-day regression analysis. First, the Company included a wind variable in its regression analysis; and, second, IPL included a dummy variable for November 2009.

The Department reviewed the design-day calculations and it appears that the wind variable has a minimal impact on the design-day calculation. In addition, the Department notes that a wind variable, wind adjusted heating degree days (HDD), or wind chill are included in the design-day regression analyses of other regulated gas utilities in Minnesota; as such, the Department does not have an issue with the inclusion of a wind variable. In terms of the November 2009 dummy variable, IPL stated that this was included in the regression analysis to account for an unusually high amount of grain drying. The November 2009 data points exhibit unexpectedly high consumption at low HDDs. Since the Company's design day assumes no impact from grain drying, IPL determined that it was reasonable to account for

these unusual circumstances. The Department concludes that the use of a November 2009 dummy variable is appropriate.

The Company also included additional calculations which tie the reserve margin to the statistical results from the design-day analysis. This additional analysis was in response to a Department request in Docket No. G001/12-737 and was used by Interstate in last year's demand entitlement filing. The Department appreciates that the Company included this additional information in its *Petition*.

Interstate calculated its design day using historical daily heating season weather and throughput data over the period from November 2009 to March 2014. As previously noted, Interstate also included a dummy variable for November 2009 to account for unusually high amount of grain drying. Interstate did not include holidays, weekends, and days with average temperatures warmer than 50°F (15 HDD) in its daily data. The Company stated in its *Petition* that it did not include these days in its analysis because they are unlikely to represent a peak-day event. In addition, IPL stated in its April 1, 2013 *Supplemental Filing* in Docket No. G001/M-12-737 that since its analysis is cross-sectional in nature (*i.e.,* each data point is independent) including these omitted dates is not necessary for the statistical integrity of the analysis. Although there is likely some relationship between weather and usage on a day-over-day basis (*i.e.,* cold spells), these relationships likely are not that great; as such, the Company's decision to undertake a cross-sectional analysis is not inappropriate.

Interstate filed its supporting data, design-day regression equations, and design-day calculations concurrent to its *Petition*. Included in the design-day calculations is a full derivation of how the Company calculated interruptible sales. Interstate must estimate interruptible sales because the interstate pipelines (*e.g.,* Northern) do not collect daily data on a per-class basis, and the Company's interruptible customers are not required to have telemetering. Interstate estimated natural gas use by interruptible customers at peak periods using the following steps:

1. Subtract from total peak-month use the interruptible transport load to obtain peak-month sales data.
2. Subtract from peak-month sales data the estimated non-weather use by interruptible customers, based on the average daily summer (non-heat) usage by interruptible customers, multiplied by the number of days in the peak month.
3. Estimate the weather-sensitive load of interruptible customers by subtracting the non-weather use by interruptible customers (estimated in step 2) from total use by interruptible customers in the peak month and dividing this weather-sensitive load by the number of heating degree days in the peak month. This calculation results in an estimate of the heating-related load of interruptible customers per degree day.

4. Multiply the heating-related load of interruptible customers per degree day obtained in step 3 by the design-day heating degree days and subtract this amount from the amount in step 2. This calculation results in the peak-month use by firm sales customers. These values are limited to values greater than or equal to zero.

Interstate's current design-day analysis resulted in a slight decrease (120 Dkt/day) in peak-day estimates compared to its last design-day analysis. Based on the information in DOC Attachment 2, Interstate's current peak-day forecast resulted in a figure that is less than the peak-day sendout during the 2003-2004 heating season. Generally, this result would elicit serious concerns regarding a utility's ability to serve firm customers on a peak day; however, Interstate's historical peak-day sendout amounts included usage by interruptible customers,[2] which resulted in an over-estimation of the amount of entitlements necessary to serve firm customers on a peak day.

It is also important to note that weather conditions during the most recent heating season (2013-2014 heating season) were extreme and saw the coldest conditions experienced during the last 20 years. In fact, based on the raw data provided by IPL, it appears that weather conditions on January 6, 2014 represented the coldest average weather conditions over a 24-hour period in the last 20 years, which would represent design-day conditions. The Company reported total firm throughput of 11,230 Dkt/day on the peak day which was 1,805 Dkt/day less than the estimated design-day throughput for the 2013-2014 heating season of 13,035 Dkt/day. Although the peak firm sendout occurred on a day with temperatures warmer than 90 HDD, actual peak throughput was below the estimated design-day, not inclusive of the reserve margin (when the reserve margin is included, IPL had 14,219 Dkt/day of entitlements available), which shows that Interstate procured sufficient entitlements to serve firm need during the past heating season.

Based on its review and IPL's system performance during the last heating season, the Department concludes that Interstate's design-day analysis likely estimates sufficient capacity to serve firm need on a peak day.

3. Reserve Margin

As indicated in Department Attachment 2, Interstate's proposed reserve margin is as follows:

[2] Interstate began reporting only firm peak day consumption with its 2011-2012 demand entitlement filing in Docket No. G001/M-11-1066.

Total Entitlement (Dkt/day)	Design-day Estimate (Dkt/day)	Difference (Dkt/day)	Reserve Margin %	% Change From Previous Year[3]
14,219	12,915	1,304	10.10	1.02

As a result of the small decrease in Interstate's estimated design-day throughput and maintaining the same level of total entitlements, the Company's estimated design-day reserve margin increased from 9.08 percent to 10.10 percent. This is a further increase in the reserve margin over earlier years and brings the reserve margin above what has historically been the 5 percent reserve margin objective. As noted in earlier demand entitlement filings, the 5 percent reserve margin threshold is subjective because it is based on the operational circumstances for a different utility. As such, the Department concluded, in Docket No. G001/M-12-737, that a more appropriate reserve margin would be one that is related to Interstate's operational characteristics and tied to the Company's own design-day analysis. Therefore, the Department requested, that the Company examine methods that would tie the reserve margin with its statistical analysis. Subsequently, Interstate provided calculations that attempt to tie its reserve margin to its design-day analysis in its *Petition*.

In its *Petition*, the Company tied the reserve margin to its design-day analysis by using the standard deviation of the design-day model residuals and a confidence interval determinant. This is the same approach that was used in Interstate's 2013-2014 heating season demand entitlement filing.[4]

The Department compared Interstate's proposed entitlement level with the level that would be produced by using the Company's method for tying the reserve margin to the regression results. The figures are not the same, which shows that the Company's proposed reserve margin is not tied explicitly to the results of the design-day analysis. The Company's proposed total entitlement level, 14,219 Dkt/day, is 150 Dkt/day more than the 14,069 Dkt/day which would result from the 95 percent confidence interval analysis conducted by Interstate. Despite this difference, the Department does not believe the difference is significant or greatly impacts firm reliability for three reasons. First, the difference between the values is approximately 1 percent, which is small and likely within the forecasting error for the regression model. Second, the procured total entitlement value and the model-estimated entitlement levels are both greater than the Company's design-day estimate, which is Interstate's projection of use on a peak day; as such, Interstate's proposed entitlement level, 14,219 Dkt/day, ensures a greater level of security on a peak day than the regression-estimated level. Third, the difference in values may be related to how Northern sells entitlements. Northern sells entitlements in package amounts (*e.g.,* 200

[3] As shown in DOC Attachment 2, the Company's average reserve margin since 1994 is 10.44 percent.
[4] An in-depth discussion of this analysis was included in the Department's August 23, 2013 *Comments* in Docket No. G001/M-13-579.

Dkt/day, 300 Dkt/day) so it is possible that Interstate decided to use the higher entitlement level because the Company had signed contracts with Northern and was unable to turn back capacity or wanted to maintain entitlement levels in preparation for future growth.

The Company also provided data showing that an interruptible customer shifted to firm service in May 2014, which means that Interstate must take this into account when using historical data in estimating peak-day throughput. Based on the monthly usage data for this customer in Attachment C of the *Petition*, it appears that this former interruptible customer will likely use between 90 and 110 Dkt/day on a peak day. Further, as noted earlier in these *Comments*, Interstate's peak sendout, which occurred during the last heating season, happened on a day with an average temperature of 86 HDD. The peak day is typically modeled after the highest firm sendout in the history of the system, or in the past 20 years; however, the Department has, historically, used the 90 HDD figure as a planning objective. Since the Company's peak day sendout occurred at 86 HDD, the possibility exists that consumption would be even greater at 90 HDD. Therefore, the Department substituted the 90 HDD value into IPL's design-day regression analysis. The equation yielded an estimated throughput figure of 13,330 Dkt/day.[5] When the estimated 90 HDD design-day number is added to estimated consumption by the former interruptible customer, the Department calculates an estimated design-day of approximately 13,430 Dkt/day, which is still below the proposed total entitlement level of 14,219 Dkt/day.

Based on its review of Interstate's reserve margin method, the Department concludes that the Company's reserve margin is reasonable in this proceeding. The Department continues to encourage IPL to provide, in future demand entitlement filings, its analysis tying the reserve margin to the Company's design-day analysis to serve as a check on the appropriateness of its proposed reserve margin.

B. THE COMPANY'S PGA COST RECOVERY PROPOSAL

The demand entitlement amounts listed in DOC Attachment 1 represent the demand entitlements for which the Company's firm customers would pay. In its *Petition*, the Company compared its proposed November 2014 Purchased Gas Adjustment (PGA) changes to its July 2014 PGA as a means of highlighting its changes.[6] As noted above, and

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[5] This figure is based on the coefficient values provided in Attachment A, Page 4 of 8, in the Company's *Petition*. The estimated value is calculated using this equation:

$$15{,}606 = (0.06781+(0.01495*90)+(0.00557*7))*10{,}746$$

This equation assumes total system throughput, which is inclusive of interruptible consumption. When the Company's estimated interruptible consumption of 2,276 Dkt/day is removed, it results in estimated firm throughput of 13,330 Dkt/day.

[6] Interstate Attachment A, Pages 6 and 7 of 8. Please note that Interstate does not vary its commodity cost of gas in its comparison.

in the Company's *Petition*, Interstate did not propose changes to its total entitlement levels; therefore, there is no change in annual bills, related to demand costs, for the Company's ratepayers. There may, however, be changes related to re-allocation of TF-12 service, but this will not be known until Interstate makes its supplemental filing on, or about, November 1, 2014. The Department will provide further comments, if appropriate, at that time.

III. THE DOC'S RECOMMENDATIONS

The Department recommends that the Commission:

- approve Interstate's proposed level of demand entitlement; and
- allow IPL to recover associated demand costs through the monthly Purchased Gas Adjustment effective November 1, 2014.

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Minnesota Department of Commerce, Division of Energy Resources
Interstate's Minnesota System Demand Entitlements: Historical and Current Proposal
Docket No. G001/M-14-560
DOC Attachment 1

Interstate Power and Light (Gas Utility) Proposed Entitlements

2010-2011 Heating Season G001/M-10-1155	Quantity (Mcf)	Difference
TF-12 Base	**4,020**	**(246)**
TF-12 Variable	**7,494**	**246**
TF-5	**5,176**	**0**
TFX	**800**	**0**
LP Peak Shaving	**0**	**0**
FDD	5,984	0
FDD - Capacity	68,992	0
TFF	0	0
SMS	1,676	0
SBA	0	0
Total Design-Day Capacity	**17,490**	**0**
Total Transportation	17,490	0
Total Peak Shaving Capacity	0	0
Total Annual Transportation	11,514	0
Total Season Transportation	5,976	0
Peak Shaving as % of Total Capacity	0.0%	0.0%
Annual Transportation as % of Total Capacity	65.8%	0.0%
Seasonal Transportation as % of Total Capacity	34.2%	0.0%
Seasonal Transportation as % of Total Transportation	34.2%	0.0%

2011-2012 Heating Season G001/M-11-1066	Quantity (Mcf	Difference
TF-12 Base	**4,234**	**214**
TF-12 Variable	**7,447**	**(47)**
TF-5	**5,009**	**(167)**
TFX	**800**	**0**
LP Peak Shaving	**0**	**0**
FDD	5,984	0
FDD - Capacity	68,992	0
TFF	0	0
SMS	1,676	0
SBA	0	0
Total Design-Day Capacity	**17,490**	**0**
Total Transportation	17,490	0
Total Peak Shaving Capacity	0	0
Total Annual Transportation	11,681	167
Total Season Transportation	5,809	(167)
Peak Shaving as % of Total Capacity	0.0%	0.0%
Annual Transportation as % of Total Capacity	66.8%	1.0%
Seasonal Transportation as % of Total Capacity	33.2%	-1.0%
Seasonal Transportation as % of Total Transportation	33.2%	-1.0%

2012-2013 Heating Season–Revised G001/M-12-737	Quantity (Mcf)	Difference
TF-12 Base	**3,377**	**(857)**
TF-12 Variable	**6,036**	**(1,411)**
TF-5	**4,006**	**(1,003)**
TFX	**800**	**0**
LP Peak Shaving	**0**	**0**
FDD	5,984	0
FDD - Capacity	68,992	0
TFF	0	0
SMS	1,676	0
SBA	0	0
Total Design-Day Capacity	**14,219**	**(3,271)**
Total Transportation	14,219	(3,271)
Total Peak Shaving Capacity	0	0
Total Annual Transportation	9,413	(2,268)
Total Season Transportation	4,806	(1,003)
Peak Shaving as % of Total Capacity	0.0%	0.0%
Annual Transportation as % of Total Capacity	66.2%	-0.6%
Seasonal Transportation as % of Total Capacity	33.8%	0.6%
Seasonal Transportation as % of Total Transportation	33.8%	0.6%

2013-2014 Heating Season G001/M-13-579	Quantity (Mcf)	Difference
TF-12 Base	**3,377**	**0**
TF-12 Variable	**6,036**	**0**
TF-5	**4,006**	**0**
TFX	**800**	**0**
LP Peak Shaving	**0**	**0**
FDD	5,984	0
FDD - Capacity	68,992	0
TFF	0	0
SMS	1,676	0
SBA	0	0
Total Design-Day Capacity	**14,219**	**0**
Total Transportation	14,219	0
Total Peak Shaving Capacity	0	0
Total Annual Transportation	9,413	0
Total Season Transportation	4,806	0
Peak Shaving as % of Total Capacity	0.0%	0.0%
Annual Transportation as % of Total Capacity	66.2%	0.0%
Seasonal Transportation as % of Total Capacity	33.8%	0.0%
Seasonal Transportation as % of Total Transportation	33.8%	0.0%

2014-2015 Heating Season G001/M-14-560	Quantity (Mcf	Difference
TF-12 Base	**1,393**	**(1,984)**
TF-12 Variable	**8,020**	**1,984**
TF-5	**4,006**	**0**
TFX	**800**	**0**
LP Peak Shaving	**0**	**0**
FDD	6,008	24
FDD - Capacity	69,272	280
TFF	0	0
SMS	1,682	6
SBA	0	0
Total Design-Day Capacity	**14,219**	**0**
Total Transportation	14,219	0
Total Peak Shaving Capacity	0	0
Total Annual Transportation	9,413	0
Total Season Transportation	4,806	0
Peak Shaving as % of Total Capacity	0.0%	0.0%
Annual Transportation as % of Total Capacity	66.2%	0.0%
Seasonal Transportation as % of Total Capacity	33.8%	0.0%
Seasonal Transportation as % of Total Transportation	33.8%	0.0%

Note: Only items in bold (transportation services and peak shaving capacity) affect the total entitlement level.

Minnesota Department of Commerce, Division of Energy Resources
Interstate's Minnesota System Demand Entitlement Analysis
Docket No. G001/M-14-560

DOC Attachment 2

Interstate Power and Light (Gas Utility)

	Number of Firm Customers			Design Day Requirement			Total Entitlement + On-line Storage + Peak Shaving			Reserve Margin
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Heating Season	Number of Customers	Change from Previous Year	% Change From Previous Year	Design Day (Mcf)	Change from Previous Year	% Change From Previous Year	Total Entitlemen (Mcf)	Change from Previous Year	% Change From Previous Year	% of Reserve Margin [(7)-(4)]/(4)
2014-2015	10,690	14	0.13%	12,915	(120)	-0.92%	14,219	0	0.00%	10.10%
2013-2014	10,676	68	0.64%	13,035	(407)	-3.03%	14,219	0	0.00%	9.08%
2012-2013	10,608	(41)	-0.39%	13,442	515	3.98%	14,219	(3,271)	-18.70%	5.78%
2011-2012	10,649	66	0.62%	12,927	(3,767)	-22.56%	17,490	0	0.00%	35.30%
2010-2011	10,583	0	0.00%	16,694	133	0.80%	17,490	0	0.00%	4.77%
2009-2010	10,583	(23)	-0.22%	16,561	(150)	-0.90%	17,490	0	0.00%	5.61%
2008-2009	10,606	8	0.08%	16,711	(18)	-0.11%	17,490	0	0.00%	4.66%
2007-2008	10,598	10	0.09%	16,729	94	0.57%	17,490	0	0.00%	4.55%
2006-2007	10,588	95	0.91%	16,635	22	0.13%	17,490	0	0.00%	5.14%
2005-2006	10,493	9	0.09%	16,613	377	2.32%	17,490	(530)	-2.94%	5.28%
2004-2005	10,484	(55)	-0.52%	16,236	(829)	-4.86%	18,020	(120)	-0.66%	10.99%
2003-2004	10,539	74	0.71%	17,065	125	0.74%	18,140	239	1.34%	6.30%
2002-2003	10,465	72	0.69%	16,940	111	0.66%	17,901	250	1.42%	5.67%
2001-2002	10,393	83	0.81%	16,829	(7)	-0.04%	17,651	800	4.75%	4.88%
2000-2001	10,310	91	0.89%	16,836	496	3.04%	16,851	632	3.90%	0.09%
1999-2000	10,219	(138)	-1.33%	16,340	(1,013)	-5.84%	16,219	(4,555)	-21.93%	-0.74%
1998-1999	10,357	68	0.66%	17,353	158	0.92%	20,774	0	0.00%	19.71%
1997-1998	10,289	68	0.67%	17,195	157	0.92%	20,774	0	0.00%	20.81%
1996-1997	10,221	68	0.67%	17,038	157	0.93%	20,774	0	0.00%	21.93%
1995-1996	10,153	232	2.34%	16,881	(1,416)	-7.74%	20,774	(500)	-2.35%	23.06%
1994-1995	9,921			18,297			21,274			16.27%
Average Per Year:	10,449	38	0.38%	16,156	(269)	-1.55%	17,648	(353)	-1.76%	10.44%

Firm Peak Day Sendout

	(11)	(12)	(13)	(14)	(15)	(16)	(17)
Heating Season	Firm Peak Day Sendout (Mcf)	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 Sendout per Customer (11)/(1)
2014-2015		n/a	n/a	0.1220	1.2081	1.3301	n/a
2013-2014	11,230	1,318	13.30%	0.1109	1.2210	1.3319	1.0519
2012-2013	9,912	1,500	17.83%	0.0732	1.2672	1.3404	0.9344
2011-2012	8,412	(1,830)	-17.87%	0.4285	1.2139	1.6424	0.7899
2010-2011	10,242	(1,731)	-14.46%	0.0752	1.5774	1.6527	0.9678
2009-2010	11,973	(563)	-4.49%	0.0878	1.5649	1.6527	1.1313
2008-2009	12,536	1,664	15.31%	0.0734	1.5756	1.6491	1.1820
2007-2008	10,872	(714)	-6.16%	0.0718	1.5785	1.6503	1.0259
2006-2007	11,586	(465)	-3.86%	0.0808	1.5711	1.6519	1.0943
2005-2006	12,051	12	0.10%	0.0836	1.5832	1.6668	1.1485
2004-2005	12,039	(1,960)	-14.00%	0.1702	1.5486	1.7188	1.1483
2003-2004	13,999	1,673	13.57%	0.1020	1.6192	1.7212	1.3283
2002-2003	12,326	1,453	13.36%	0.0918	1.6187	1.7106	1.1778
2001-2002	10,873	(4,203)	-27.88%	0.0791	1.6193	1.6984	1.0462
2000-2001	15,076	1,692	12.64%	0.0015	1.6330	1.6344	1.4623
1999-2000	13,384	(2,202)	-14.13%	(0.0118)	1.5990	1.5871	1.3097
1998-1999	15,586	2,230	16.70%	0.3303	1.6755	2.0058	1.5049
1997-1998	13,356	(695)	-4.95%	0.3478	1.6712	2.0190	1.2981
1996-1997	14,051	(1,719)	-10.90%	0.3655	1.6670	2.0325	1.3747
1995-1996	15,770	(56)	-0.35%	0.3834	1.6627	2.0461	1.5532
1994-1995	15,826			0.3001	1.8443	2.1443	1.5952
Average Per Year:	12,555	(242)	-0.85%	0.1603	1.5485	1.7089	1.2062

Note: Interstate discontinued peak-shaving on its system after the 1998-1999 demand entitlement. The inclusion of peak-shaving in Interstate's total entitlement levels contributes to the large reserve margins prior to the 1999-2000 heating season.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, 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. **G001/M-14-560**

Dated this 31st day of July 2014

/s/Sharon Ferguson

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