

October 26, 2015

Daniel P. Wolf
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. G022/M-15-851

Dear Mr. Wolf:

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

Greater Minnesota Gas Inc.'s (GMG, the Company) Miscellaneous Filing of Tariff Changes in Compliance with the Commission's Order in Docket No. G022/AA-14-728 and its Directive in Docket No. G022/M-15-315.

The filing was submitted on September 24, 2015. The petitioner is:

Kristine A. Anderson
Corporate Attorney
Greater Minnesota Gas Company, Inc.
202 South Main Street
Le Sueur, Minnesota 56058

The Department recommends that the Minnesota Public Utilities Commission (Commission):

- acknowledge that GMG complied with the 14-728 and 15-315 Orders;
- approve the section of GMG's proposed tariff related to the curtailment penalty; and
- take no action on the section of GMG's proposed tariff related to the Company's Gas Affordability Program tariff.

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

Sincerely,

/s/ ANGELA BYRNE
Financial Analyst
651-539-1820

AB/ja
Attachment



BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET No. E022/M-15-851

I. BACKGROUND

On September 24, 2015, Greater Minnesota Gas, Inc. (GMG or the Company) filed a *Petition* with the Minnesota Public Utilities Commission (Commission) to revise its tariff in compliance with the Commission's Orders in Docket Nos. G022/AA-14-728 and G022/M-15-315.

Docket No. G022/AA-14-728 (Docket 14-728) addressed GMG's Annual Automatic Adjustment (AAA) Reports and the Company's 2013-2014 True-Up Filing. This docket came before the Commission at its August 6, 2015 agenda meeting, and the Commission issued its Order on August 24, 2015 (14-728 Order).

Docket No. G022/M-15-315 (Docket 15-315) addressed GMG's 2014 Annual Gas Affordability Program (GAP) Compliance Report. This docket was heard by the Commission at its September 17, 2015 agenda meeting, and the Commission issued its Order on September 29, 2015 (15-315 Order).

The Minnesota Department of Commerce, Division of Energy Resources (Department) provides its analysis of the *Petition* below.

II. DEPARTMENT ANALYSIS

A. COMPLIANCE WITH DOCKET 14-728

In its 14-728 Order, the Commission required GMG to make a miscellaneous filing in a new docket within 30 days of the Order to update the Company's tariff to include a \$5.00-per-therm curtailment penalty.

GMG provided both red-lined and clean versions of its revised tariff, Section V, Sheet No. 14, updating its curtailment penalty from \$1.00 per therm to \$5.00 per therm, as ordered by the Commission. The Department concludes that GMG has complied with the 14-728 Order and recommends that the Commission approve the Company's proposed change.

B. COMPLIANCE WITH DOCKET 15-315

In its 15-315 Order dated September 29, 2015, the Commission ordered GMG to,

- extend its pilot GAP program for a period of one year (until December 31, 2016); and
- file an updated tariff, within 10 days of the date of the order, to reflect the revised term of the Program.

GMG provided both red-lined and clean versions of its revised tariff, Section V, Sheet Nos. 21-23, extending its GAP pilot through December 31, 2016.

The Department notes that on September 25, 2015, GMG submitted a miscellaneous filing proposing a substantial change to its GAP tariff in Docket No. G022/M-15-855 (Docket 15-855). It appears that the tariff revisions proposed in Docket 15-855 supersede the revisions provided in this docket, since the Company is requesting that the Commission approve this new program beginning January 1, 2016. The Department filed its Comments in Docket 15-855 on October 16, 2015 recommending approval of GMG's proposed tariff, with only a minor clarifying edit.

The Department concludes that the Company has complied with the Commission's Order in Docket 15-315, however the Department recommends that the Commission take no action in approving these related tariff sheets, and merely acknowledge that GMG complied with its 15-315 Order.

III. RECOMMENDATIONS

Based on its review, the Department recommends that the Commission,

- acknowledge that GMG complied with the 14-728 and 15-315 Orders;
- approve the section of GMG's proposed tariff related to the curtailment penalty; and
- take no action on the section of GMG's proposed tariff related to the Company's GAP tariff.

/ja

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. G022/M-15-851

Dated this 26th day of October 2015

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.	202 S. Main Street Le Sueur, MN 56058	Electronic Service	No	OFF_SL_15-851_M-15-851
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