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November 15, 2022

Will Seuffert
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 Application of Minnesota Energy Resources Corporation for
Authority to Increase Rates for Natural Gas Service in Minnesota
Docket No. G011/GR-22-504
Reply Comments of Minnesota Energy Resources Corporation

Dear Mr. Seuffert:

On November 1, 2022, Minnesota Energy Resources Corporation ("MERC" or the "Company") filed the above-referenced rate case, requesting a base rate increase and implementation of interim rates effective January 1, 2023. On November 4, 2022, the Minnesota Public Utilities Commission ("Commission") issued a Notice of Comment Period on Completeness and Procedures in the above-referenced docket, requesting initial comments by November 10 and reply comments by November 15 on the following topics:

1. Whether MERC's application complies with the filing requirements of Minn. Stat. §216B.16, Minnesota Rules Parts 7825.3100 to 7825.4400, and relevant Commission Orders, and
2. Whether this matter should be sent to the Office of Administrative Hearings ("OAH") for a contested case hearing and if so, what should be the scope of the hearing?

On November 10, 2022, the Department of Commerce, Division of Energy Resources ("Department") filed comments recommending that the Commission accept MERC's filing as substantially complete and refer this matter to OAH for a contested case proceeding. The Department further recommended the scope of the contested case proceeding should include, but not be limited to, the following issues:

1. Is MERC's proposed test-year revenue increase reasonable?
2. Has MERC appropriately ensured that costs proposed to be paid by ratepayers pertain only to regulated utility costs?
3. Are MERC's proposed capital structure, cost of capital, and return on equity reasonable?
4. Is MERC's proposed rate design reasonable?

MERC appreciates the Department's review and agrees with the Department's recommendations.

On November 10, 2022, the Minnesota Office of the Attorney General, Residential Utilities Division ("OAG") also filed comments. The OAG's comments do not address the issues set forth in the Commission's Notice, but instead raise an entirely different issue with respect to the

Company's interim rate proposal.¹ The OAG acknowledges that interim rates are generally set by formula in accordance with Minnesota Statutes, as reflected in MERC's petition for interim rates, but argues the Commission may depart from that formula if it finds "exigent circumstances" to do so.² The OAG recommends that the Commission find exigent circumstances to deviate from the statutory formula and require a 50 percent reduction in MERC's requested interim rates for the residential class.

To support that exigent circumstances exist to reduce interim rates for the residential class, the OAG cites to the impacts of the COVID-19 pandemic, inflation, the increasing cost of natural gas commodity, and the impacts of the extraordinary gas costs incurred to provide service to customers in February 2021.³ However, OAG does not provide necessary context for its commentary on inflation, gas costs, or the pandemic, and does not recognize other factual circumstances (in addition to the statutory formula) that specifically support the Company's interim rate request. In addition, the OAG does not cite any basis for the amount of its recommended 50 percent reduction. Reducing MERC's interim rates as proposed by the OAG would deny the Company the opportunity to recover its cost of service for the test year. Further, other considerations support approval of the Company's interim rates as proposed and are relevant to assess the impact of the interim rate increase in this case.

First, MERC has not filed a general rate increase request in five years – since 2017. This contrasts with the 2021 interim rate orders relied upon by the OAG where the Commission found exigent circumstances to support a reduction to residential interim rates. For example, the 2021 CenterPoint rate case relied on by the OAG was the third general rate increase filed by CenterPoint in the same period (2017, 2019, and 2021). MERC has successfully delayed a rate case for several years, despite the impacts of inflation on its cost of service (as discussed in more detail below), thereby containing customers' base rates and making interim and final rate recovery in this case particularly important.

Second, the OAG ignores that a meaningful portion of the interim rate increase for MERC is attributable to MERC rolling its current Natural Gas Extension Project ("NGEP") and Gas Utility Infrastructure Cost ("GUIC") riders into base rates with interim rates, consistent with the Commission's directives in the Company's rider dockets.⁴ Because the costs related to the

¹ Minn. Stat. §216B.16, subd. 3(a) provides "The Commission shall order the interim rate schedule ex parte without a public hearing." In accordance with statutory directive, the Commission should not consider the OAG's comments on this topic. However, MERC responds to the OAG's comments to address why the OAG's recommendations are also substantively inappropriate.

² OAG Comments at 1.

³ OAG Comments at 1-3. The OAG also cites to the Commission's orders finding exigent circumstances to reduce interim rates for CenterPoint, Xcel electric, and Minnesota Power. See *In the Matter of the Application by CenterPoint Energy Res. Corp. d/b/a CenterPoint Energy Minn. Gas for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G008/GR-21-435, Order Setting Interim Rates (Dec. 20, 2021); *In the Matter of the Application of Northern States Power Co. d/b/a Xcel Energy for Authority to Increase Rates for Electric Service in the State of Minnesota*, Docket No. E002/GR-21-630, Order Setting Interim Rates at 7 (Dec. 23, 2021); *In the Matter of the Application by Minnesota Power for Authority to Increase Rates for Electric Service in Minnesota*, Docket No. E015/GR-21-335, Order Setting Interim Rates at 5 (Dec. 30, 2021).

⁴ Over 20 percent of MERC's interim rate increase (approximately \$7.5 million) is attributable to the roll in of the NGEP and GUIC riders. Because customers are already paying those costs through a different

GUIC and NGEF riders are already being recovered through Commission-approved rider surcharge rates, rolling those costs into base rates while setting the rider surcharges to zero will not increase customer bills. This fact is important to keep in mind when evaluating the impact to residential customers and when trying to draw comparisons to other utilities.

Third, Minnesota Statutes protect customers by requiring that interim rates be subject to refund with interest in the event the Company collects more than it would have collected in final rates. Should the Commission set interim rates lower than final rates, the Company has little, if any, recourse to recover the incremental costs incurred during the months-long regulatory process.

Further, the OAG's reasons for proposing an interim rate reduction do not warrant a finding of exigent circumstances. With respect to gas costs, the OAG's Comments incorrectly state that MERC customers are being impacted by the recovery of the approximately \$65 million of extraordinary costs incurred to serve customers during the February 2021 market price spike.⁵ Importantly, MERC entered into a settlement that included the OAG, as well as the Department and the Citizens Utility Board ("CUB"), which included an adjustment to extraordinary gas cost recovery of \$3 million, reducing the overall costs recovered from customers.⁶ Perhaps more importantly, in reaching that settlement, the parties, including the OAG, acknowledged that the \$3 million adjustment was supported by substantial evidence, was in the public interest, and ameliorated the burden on ratepayers of the extraordinary gas costs.⁷ The Commission approved the settlement by Order Adopting Settlement Agreement dated October 19, 2022, concurring with the OAG, Department, and CUB that "the settlement achieves a reasonable reduction in cost recovery while simultaneously enabling the Company to recover a meaningful portion of its costs."⁸

In addition, on November 4, 2022, MERC filed revised Severe Weather Cost Recovery Surcharge rates incorporating the \$3 million adjustment to the benefit of our customers, and proposed an expedited effective date of December 1, 2022, to enable customers to see the benefit of the reduced rates as quickly as possible.⁹

Apart from the February 2021 Event, it is important to note that while gas commodity market costs are currently higher than in recent years, prices are in line with those experienced over the

mechanism currently (the rider surcharge rates), the roll in of those riders does not result in an incremental increase to customer bills.

⁵ OAG Comments at 2.

⁶ Thus, the OAG's request for a reduction in interim rates states an incorrect amount of February 2021 extraordinary gas costs to be recovered from customers. *In the Matter of the Petition of Minn. Energy Res. Corp. for Approval of a Recovery Process for Cost Impacts Due to Feb. Extreme Gas Mkt. Conditions*, Docket No. G011/CI-21-611, Offer of Settlement at 2 (Aug. 10, 2022).

⁷ *In the Matter of the Petition of Minn. Energy Res. Corp. for Approval of a Recovery Process for Cost Impacts Due to Feb. Extreme Gas Mkt. Conditions*, Docket No. G011/CI-21-611, Order Adopting Settlement Agreement at 11 (Oct. 19, 2022).

⁸ *Id.*

⁹ *In the Matter of the Petition of Minn. Energy Res. Corp. for Approval of a Recovery Process for Cost Impacts Due to Feb. Extreme Gas Mkt. Conditions*, Docket No. G011/CI-21-611, Compliance Filing – Severe Weather Cost Recovery Surcharge Tariff and Rates Proposed Effective December 1, 2022 (Nov. 4, 2022).

past twenty years,¹⁰ and MERC does not earn any margins on these costs; rather, gas commodity costs are recovered with no markup and reflect the actual prices the Company must pay to procure the natural gas commodity for its customers. Current gas prices are not at extraordinary levels, and do not warrant a finding of exigent circumstances that should be based on conditions that “bespeak[] urgency or emergency.”¹¹

The OAG also cites to the COVID-19 pandemic as a basis for finding exigent circumstances to reduce residential interim rates, but outside of inflation and gas prices does not state why the pandemic itself currently warrants a finding of exigent circumstances. In accordance with the Commission’s Order in Docket No. E,G999/CI-20-375, MERC’s Commission-approved COVID-19 transition plan to resume pre-pandemic collections activities was implemented in June 2021 and the transition period ended April 30, 2022 – over six months ago.¹² Since the expiration of utilities’ transition plans, MERC has continued to use established mechanisms, including the Cold Weather Rule and MERC’s Gas Affordability Program to address any lingering effects the pandemic may continue to have on customers.

Finally, the OAG suggests inflation is a basis for reducing the Company’s interim rates for the residential class. However, the same inflationary pressures that OAG cites as creating exigent circumstances with respect to residential customers are also affecting MERC’s cost to provide safe, reliable service to customers and are driving the need for MERC’s requested rate relief.¹³

While there is insufficient basis to reduce interim rates for residential customers under the circumstances, even if exigent circumstances existed with respect to the residential class, the OAG’s proposal of a 50 percent reduction to the residential interim rate increase is unreasonable and unsupported.

With respect to CenterPoint, the Commission found exigent circumstances to limit CenterPoint’s interim rate increase for residential customers to “the level that CenterPoint proposed as part of its alternative interim-rate plan” based on the Company’s voluntary proposal to limit its rate increase.¹⁴ Similarly, for Xcel electric, the Commission found exigent circumstances to limit Xcel’s interim rate increase for residential customers “to \$79.85 million—the level that Xcel Energy proposed as part of its alternative interim rate plan” based on Xcel’s voluntary

¹⁰ Prior to 2010, natural gas commodity prices experienced substantial volatility, with monthly gas commodity prices at NNG-Ventura significantly higher than current market pricing.

¹¹ *In re the Application of Peoples Natural Gas Co. for Authority to Increase Rates for Gas Utility Service in Minn.*, 389 N.W.2d 903, 907 (Minn. 1986).

¹² *In the Matter of an Inquiry into Actions by Electric and Natural Gas Utilities in Light of the COVID-19 Pandemic Emergency*, Docket No. E,G999/CI-20-375, Order Adopting Broad Transition Plan Proposal, Suspending Negative Reporting, and Establishing Notice and Communication Requirements (May 26, 2021).

¹³ See Direct Testimony of Richard F. Stasik at 7 (noting the Compound Average Growth Rate of inflation since MERC’s last rate case is 4.25 percent).

¹⁴ *In the Matter of the Application by CenterPoint Energy Res. Corp. d/b/a CenterPoint Energy Minn. Gas for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G008/GR-21-435, Order Setting Interim Rates at 5 (Dec. 20, 2021) (“Weighing in favor of a rate increase is the statutory formula for interim rates, and the utility’s professed need for additional revenues. Yet this same utility voluntarily proposed a rate stabilization plan in lieu of the rate case—a plan whereby CenterPoint would increase rates by only \$39.659 million, or 3.9%.”).

proposal.¹⁵ Finally, with respect to Minnesota Power, the Commission found exigent circumstances to limit Minnesota Power's interim rate increase for residential customers to the level proposed by Minnesota Power.¹⁶ In contrast, MERC has not proposed an alternative interim rate plan. As such, OAG's citations to these cases neither support application of exigent circumstances to MERC nearly a year later, nor a reduction in residential interim rates at the level OAG proposes.

Further, as illustrated by the table below, the magnitude of the arbitrary reduction the OAG proposes to MERC's residential interim rates is significantly greater than the level approved by the Commission in any of the cases cited or filed in 2021. The OAG provides no justification for its proposal of such a significant (50 percent) reduction with respect to MERC's residential interim rate increase, particularly in light of the factors described above that serve to mitigate the overall bill impacts for MERC's customers.

| Utility/Docket | Proposed Interim Rates | Proposed by OAG for MERC/ Commission Approved Interim Rates | % Reduction |
|---|------------------------|---|-------------|
| MERC – Docket No. G011/GR-22-504 | \$36.9M | \$25.1M ** (**OAG Proposed) | 32% |
| CenterPoint – Docket No. G008/GR-21-435 | \$51.8M | \$42.4M | 18% |
| Xcel Electric – Docket No. E002/GR-21-630 | \$288.3M | \$247.1M | 14% |
| Minnesota Power – Docket No. E015/GR-21-335 | \$87.3M | \$79.4M | 9% |
| Xcel Gas – Docket No. G002/GR-21-678 | \$24.9M | \$24.9M | 0% |

¹⁵ *In the Matter of the Application of Northern States Power Co. d/b/a Xcel Energy for Authority to Increase Rates for Electric Service in the State of Minnesota*, Docket No. E002/GR-21-630, Order Setting Interim Rates at 7 (Dec. 23, 2021) ("The Commission finds that limiting the increase in incremental rates for the residential class to \$79.85 million—the level that Xcel Energy proposed as part of its alternative interim rate plan—will provide needed, immediate relief, and will result in just and reasonable rates.").

¹⁶ *In the Matter of the Application by Minnesota Power for Authority to Increase Rates for Electric Service in Minnesota*, Docket No. E015/GR-21-335, Order Setting Interim Rates at 5 (Dec. 30, 2021) ("Weighing in favor of a rate increase is the statutory formula for interim rates, and the utility's professed need for additional revenues. Yet this same utility volunteered to reduce the rate increase for residential customers to 7.11%.").

Mr. Will Seuffert
November 15, 2022
Page 6

MERC appreciates the opportunity to provide these Reply Comments and supports the Department's recommendations as discussed above. For the reasons outlined in these Reply Comments, the OAG's proposal to reduce the Company's interim rates for residential customers by 50 percent is not supported. The Company respectfully requests that the Commission approve the Company's interim rates as proposed. In the event the Commission determines exigent circumstances necessitate a reduction to the interim rate increase for the residential class, the level of reduction proposed by the OAG is unreasonably high and without support or justification.

Please contact me at (414) 221-3685 or Richard.Stasik@wecenergygroup.com if you have any questions regarding the information in this filing. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rich F. Stasik", with a stylized flourish at the end.

Richard F. Stasik
Director– State Regulatory Affairs
Minnesota Energy Resources Corporation

cc: Service List

In the Matter of the Application of Minnesota Energy
Resources Corporation for Authority to Increase
Rates for Natural Gas Service in Minnesota

Docket No. G011/GR-22-504

CERTIFICATE OF SERVICE

I, Kristin M. Stastny, hereby certify that on the 15th day of November, 2022, 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 list.

Dated this 15th day of November, 2022.

/s/ Kristin M. Stastny
Kristin M. Stastny

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