

June 6, 2022

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

RE: **Letter of the Minnesota Department of Commerce, Division of Energy Resources**
Docket Nos. G999/AA-19-401, G011/AA-19-517, G999/AA-20-172, and G011/AA-20-655.

Dear Mr. Seuffert:

The Minnesota Department of Commerce, Division of Energy Resources (Department) reviewed Minnesota Energy Resources Corporation's (MERC or the Company) May 6, 2022 Reply Comments for the fiscal year (FYE) 2019 and 2020 natural gas Annual Automatic Adjustment (AAA) reports/true ups. Responsive to the Department's request, MERC's Reply Comments explained that differences in presentation, not miscalculations, caused the apparent discrepancies the Department noticed between the Daily Deliver Variance Charges (DDVCs)/other penalty charges reported in the Company's AAA filings and in its responses to Department information requests. MERC indicated it correctly accounted for its DDVCs/other penalty charges in both its 2019 and 2020 AAA reports/true ups, as the Department-noted presentation differences do not impact the Company's accounting for these charges. The Department appreciates MERC providing this explanation and we raise no further issues with the Company's 2019 and 2020 AAA reports/true ups.

With respect to the MERC Northern Natural Gas (MERC-NNG) system, the Department recommends the Minnesota Public Utilities Commission (Commission):

- Accept MERC-NNG's FYE19 true up in Docket No. G011/AA-19-517.
- Allow MERC-NNG to implement its true up, shown in Department Attachment G8 of the Department's April 26, 2022 AAA Report in Docket No. G999/AA-19-401.
- Accept MERC-NNG's FYE20 true up in Docket No. G011/AA-20-655.
- Allow MERC-NNG to implement its true up, shown in Department Attachment G8 of the Department's April 26, 2022 AAA Report in Docket No. G999/AA-20-172.

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Except for the updated recommendations detailed above, all other Department recommendations in Docket Nos. G999/AA-19-401 and G999/AA-20-172 remain the same.

Sincerely,

/s/ GEMMA MILTICH
Financial Analyst, CPA

GM/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
Letter**

**Docket No. G999/AA-19-401, G011/AA-19-517, G999/AA-20-172, and
G011/AA-20-655**

Dated this 6th day of June 2022

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.& Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_19-401_AA-19-401
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-401_AA-19-401
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_19-401_AA-19-401
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_19-401_AA-19-401
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_19-401_AA-19-401
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_19-401_AA-19-401
Lisa	Peterson	lisa.r.peterson@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-401_AA-19-401
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_19-401_AA-19-401
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-401_AA-19-401
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Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-655_AA-20-655
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Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	Yes	OFF_SL_20-655_AA-20-655
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