



Minnesota Energy Resources Corporation
2685 145th Street West
Rosemount, MN 55068
www.minnesotaenergyresources.com

September 1, 2020

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101

VIA ELECTRONIC FILING

Re: Minnesota Energy Resources Corporation – Consolidated's 2020 True-up Filing
Docket No. G011/AA-20-656

Dear Mr. Seuffert:

Minnesota Energy Resources Corporation – Consolidated ("MERC" or the "Company") submits to the Minnesota Public Utilities Commission its natural gas true-up report for the gas year ended June 30, 2020, in accordance with Minnesota Rule 7825.2910, subpart 4. Through this filing, MERC also requests that the Commission approve the Company's proposal to account for the over- and under-recoveries for the period January 1, 2020, through June 30, 2020, associated with Viking Gas Transmission's ("Viking") change in rates through this true-up adjustment. In particular, MERC requests that the Commission authorize the Company to adjust for the difference between the final Viking rates approved effective January 1, 2020, and previously approved rates for the period January 1, 2020, through June 30, 2020, to be returned to customers through the annual true-up factors effective September 1, 2020. While this proposal is consistent with the true-up adjustment computation as set forth in Minn. R. 7825.2700, subp. 7,¹ and does not require any prior-period adjustments, if the Commission concludes that any rule variances are required to effectuate the proposed adjustment, MERC's proposal meets the requirements for such variances under Minn. R. 7829.3200.

Viking filed a rate case with the Federal Energy Regulatory Commission ("FERC") on June 28, 2019, proposing an increase to its transportation rates. On July 31, 2019, FERC issued an order accepting Viking's filing, suspending rates, and approving implementation of the proposed increase to rates effective January 1, 2020, subject to refund based on final approved rates. On July 1, 2020, FERC approved a settlement with rates effective as of March 1, 2020, and required refunds for rates collected from January 1, 2020, through February 29, 2020. MERC did not make an adjustment to the monthly purchased gas adjustment ("PGA") filings incorporating the January 1, 2020, increase to Viking gas cost rates or the March 1, 2020, reduction to Viking gas cost rates. As a result, MERC-Consolidated customers were under-

¹ The true-up amount is the difference between the commodity and demand gas revenues by class collected by the utility and the actual commodity-delivered gas cost and demand-delivered gas cost by class incurred by the utility during the year. The true-up adjustment must be computed annually for each class by dividing the true-up amount by the forecasted sales volumes and applied to billings during the next 12-month period beginning on September 1 each year, provided that the adjustment has been filed under part 7825.2910, subpart 3.

charged for actual Viking gas costs incurred January through February 2020² and over-charged for Viking gas costs incurred for the period March through June 2020.³ As outlined in this filing, MERC proposes to true-up for the difference between the actual Viking rates and the rates that were billed through the monthly PGA through the true-up adjustment effective September 1, 2020, and requests that the Commission vary applicable rules in order to include these adjustments to the true-up.

As discussed in this filing, the impact of this true-up adjustment to account for actual Viking rates is small—approximately \$23,000—with an average rate impact of \$0.63 per customer. Requiring MERC to account for this adjustment through individual customer bill credits would impose an excessive burden, requiring significant system programming and administrative expense. Allowing MERC to incorporate this adjustment in the true-up ensures customers are refunded for amounts collected in excess of actual gas costs, in accordance with the Commission's PGA rules, and is consistent with the public interest.

A notice of availability of this filing has been sent to all intervenors in the Company's previous two rate cases. Please contact me at (414) 221-4208 if you have any questions regarding the information in this filing. Thank you for your attention to this matter.

Sincerely,



Joylyn C. Hoffman Malueg
Project Specialist 3
Minnesota Energy Resources Corporation

Enclosures
cc: Service List

² The difference between the rates charged in January and February and the final approved settlement rates was refunded to MERC through a refund issued by Viking in August, 2020. MERC proposes to return those refunded amounts to customers through the monthly PGA and is submitting a separate filing to address those refunds. This true-up incorporates the rates actually billed and paid for in January and February Viking gas costs.

³ MERC has adjusted the final Viking rates effective November 1, 2020, so will include additional adjustments for the period July 1, 2020, through October 31, 2020 in the Company's 2020-2021 Annual Automatic Adjustment and True-up Report to be filed September 1, 2021.

September 1, 2020

To: Service List

RE: Minnesota Energy Resources Corporation – Consolidated's True-up Filing

Notice of Availability

Please take notice that Minnesota Energy Resources Corporation-Consolidated has filed with the Minnesota Public Utilities Commission the following report: Minnesota Rule 7825.2910, Subpart 4 – Annual True-up Filing.

To obtain copies, or if you have any questions, please contact:

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Project Specialist 3
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Please note that this filing is also available through the eDockets system maintained by the Minnesota Department of Commerce and the Minnesota Public Utilities Commission. You can access this document by going to eDockets through the websites of the Department of Commerce or the Public Utilities Commission or going to the eDockets homepage at:

<https://www.edockets.state.mn.us/EFiling/edockets/searchDocuments.do?method=showeDocketsSearch&showEdocket=true&userType=public>

Once on the eDockets homepage, this document can be accessed through the Search Documents link and by entering the docket number 20-656.

**STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

**Katie J. Sieben
Valerie Means
Matthew Schuerger
Joseph K. Sullivan
John A. Tuma**

**Chair
Commissioner
Commissioner
Commissioner
Commissioner**

In the Matter of the Annual True-up Filing of
Minnesota Energy Resources Corporation –
Consolidated

TRUE-UP FILING

Docket No. G011/AA-20-656

SUMMARY OF FILING

Pursuant to Minnesota Rule 7825.2910, subpart 4, Minnesota Energy Resources Corporation – Consolidated submitted its Annual True-up Filing to the Minnesota Public Utilities Commission. The filing is presented fairly in accordance with the previously-stated rules and was prepared under our internal controls and processes.

The True-up Filing includes the following information:

- A. a schedule showing the calculation of the true-up factors;
- B. a schedule showing the prior period gas cost true-up factor recovery; and
- C. a schedule showing the volume projection for the next true-up period.

**STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

**Katie J. Sieben
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In the Matter of the Annual True-up Filing of
Minnesota Energy Resources Corporation –
Consolidated

TRUE-UP FILING

Docket No. G011/AA-20-656

INTRODUCTION

Minnesota Energy Resources Corporation (“MERC”) submits to the Minnesota Public Utilities Commission (the “Commission”) the attached True-up Filing for the MERC-Consolidated purchased gas adjustment (“PGA”) required by Minn. R. 7825.2910, subp. 4.

The following information is provided in accordance with Minn. R. 7829.1300, subp. 3:

I. Summary of Filing

Pursuant to Minn. R. 7829.1300, subp. 1, a one-paragraph summary of the filing is attached.

II. Service

Pursuant to Minn. R. 7829.1300, subp. 2, MERC has served a copy of this filing on the Department of Commerce, Division of Energy Resources (“Department”) and the Office of the Attorney General – Residential Utilities Division (“OAG”). A notice of availability and summary of the filing has been served on MERC’s general service list and all intervenors in the Company’s previous two general rate cases.

III. General Filing Information

A. Name, Address, and Telephone Number of Filing Party

Minnesota Energy Resources Corporation
2685 145th Street West
Rosemount, MN 55068
(651) 322-8901

B. Name, Address, Electronic Address, and Telephone Number of Attorney for the Filing Party

Kristin M. Stastny
Taft Stettinius & Hollister LLP
2200 IDS Center
80 South 8th Street
Minneapolis, MN 55402
KStastny@Taftlaw.com
(612) 977-8656

C. Date of the Filing and Date Proposed Change Will Take Effect

Date of filing: September 1, 2020
Proposed Effective Date: September 1, 2020

D. Statute Controlling Schedule for Processing the Filing

No statute establishes a schedule for processing this filing. Under Minn. R. 7829.1400, initial comments are due within 30 days of filing, with reply comments due 10 days thereafter.

E. Signature, Electronic Address, and Title of Utility Employee Responsible for the Filing



Joylyn C. Hoffman Malueg
Project Specialist 3
joylyn.hoffmanmalueg@wecenergygroup.com
2685 145th Street West
Rosemount, MN 55068
(414) 221-4208

IV. Description and Purpose of Filing

Minnesota Rule 7825.2910, subpart 4 requires gas utilities to file and implement on September 1 of each year the true-up adjustment computed under Minn. R. 7825.2700, subp. 7,

for the previous year commencing July 1 and ending June 30. This True-up Filing includes the following information:

- A. a schedule showing the calculation of the true-up factors;
- B. a schedule showing the prior period gas cost true-up factor recovery; and
- C. a schedule showing the volume projection for the next true-up period.

MERC also requests that the Commission approve the Company's proposal to account for the over- and under-recoveries for the period January 1, 2020, through June 30, 2020, associated with Viking Gas Transmission's ("Viking") change in rates, to be included in the true-up adjustment effective September 1, 2020. MERC has included in the true-up calculation reflected in the attached schedules the difference between the revenues by class collected and the actual delivered gas cost by class incurred with respect to the Viking rates approved by the Federal Energy Regulatory Commission ("FERC") for implementation effective January 1, 2020, and March 1, 2020.

Viking filed a rate case with FERC on June 28, 2019, proposing an increase to its transportation rates. On July 31, 2019, FERC issued an order accepting Viking's filing, suspending rates, and approving implementation of proposed increase to rates effective January 1, 2020, subject to refund based on final approved rates. On July 1, 2020, FERC approved a settlement with rates effective as of March 1, 2020, and required refunds for rates collected from January 1, 2020, through February 29, 2020. MERC did not make an adjustment to the monthly purchased gas adjustment ("PGA") filings incorporating the January 1, 2020, increase to Viking gas cost rates or the March 1, 2020, reduction to Viking gas cost rates. As a result, MERC-Consolidated customers were under-charged for actual Viking gas costs incurred January through February 2020 and over-charged for Viking gas costs incurred for the period March through June 2020. MERC has included the difference between the actual Viking rates and the rates that were billed through the monthly PGA in the true-up calculation, as reflected in the attached schedules, and proposes to include this adjustment in the true-up adjustment

effective September 1, 2020. While this proposal is consistent with the true-up adjustment computation as set forth in Minn. R. 7825.2700, subp. 7,⁴ and does not require any prior-period adjustments, if the Commission concludes that any rule variances are required to effectuate the proposed adjustment, MERC's proposal meets the requirements for such variances under Minn. R. 7829.3200, as discussed below.

MERC has incorporated the change in Viking interstate pipeline costs in the Company's Petition for Approval of a Change in Demand Entitlement for its Consolidated System in Docket No. G011/M-20-636 effective November 1, 2020. Through this true-up filing, MERC has incorporated the true-up for actual Viking purchase gas costs, encompassing the time period of January 1, 2020, through June 30, 2020, based on the Viking rates in effect during this period. The difference between the rates charged in January and February and the final approved settlement rates was refunded to MERC through a refund issued by Viking in August, 2020. MERC proposes to return those refunded amounts to customers through the monthly PGA and is submitting a separate filing to address those refunds.⁵ This true-up incorporates the rates actually billed and paid in January and February Viking gas costs. Additionally, MERC will

⁴ The true-up amount is the difference between the commodity and demand gas revenues by class collected by the utility and the actual commodity-delivered gas cost and demand-delivered gas cost by class incurred by the utility during the year. The true-up adjustment must be computed annually for each class by dividing the true-up amount by the forecasted sales volumes and applied to billings during the next 12-month period beginning on September 1 each year, provided that the adjustment has been filed under Minnesota Rule 7825.2910, subpart 3.

⁵ Minnesota Rule 7825.2700, subpart 8 requires:

Refunds and interest on the refunds, that are received from the suppliers or transporters of purchased gas and attributable to the cost of gas previously sold, must be annually refunded by credits to bills, except that cumulative refund amounts equal to or greater than \$5 per customer must be refunded within 90 days from the date the refund is received from a supplier or transporter. Refunds must be allocated to customer classes in proportion to previously charged costs of purchased gas. Within classes, the refund amount per unit must be applied to bills on the basis of individual 12-month usage. The utility shall add interest to the unrefunded balance at the prime interest rate.

MERC is submitting a separate filing proposing to return that refunded amount through the monthly PGA rather than through individual customer bill credits.

include adjustments for the period July 1, 2020, through October 31, 2020, in the Company's 2020-2021 Annual Automatic Adjustment and True-up Report to be filed September 1, 2021.

As shown in Table 1, below, MERC-Consolidated has computed the impacts of the Viking gas costs collected via the contract rate within the PGA compared to the FERC-approved rates for the time period of January 1, 2020, through June 30, 2020. The total over-collection for the period January 1, 2020, through June 30, 2020, is \$22,860, which is equal to approximately \$0.63 per customer on the MERC-Consolidated PGA. These adjustments are included in the attached true-up schedule calculations.

Table 1. Over/(Under) Collection from Viking Gas Transmission Rate Change and Customer Impacts

	PGA Charged Rate	Viking FERC Approved 1/1/20 Rate	Viking FERC Approved 3/1/20 Rate	Cumulative Difference (Under)/ Over Charged	Average MERC- CON Customer Count	Average Impact Per Customer
January 2020	\$75,000	\$79,500		(\$4,500)	36,698	(\$0.12)
February 2020	\$75,000	\$79,500		(\$9,000)	36,698	(\$0.25)
March 2020	\$75,000		\$66,000	\$ -	36,698	\$ -
April 2020	\$63,500		\$55,880	\$7,620	36,698	\$0.21
May 2020	\$63,500		\$55,880	\$15,240	36,698	\$0.42
June 2020	\$63,500		\$55,880	\$ 22,860	36,698	\$0.63
Total 2019-2020 Gas Year	\$415,500	\$159,000	\$233,640	\$22,860		\$0.63

While MERC's true-up of actual Viking gas costs is consistent with the true-up adjustment computation as set forth in Minn. R. 7825.2700, subp. 7;⁶ does not require any adjustments outside of the current annual automatic adjustment period ending June 30, 2020; and does not constitute a billing error under Minn. R. 7820.4000⁷ or an error in adjustment

⁶ The true-up amount is the difference between the commodity and demand gas revenues by class collected by the utility and the actual commodity-delivered gas cost and demand-delivered gas cost by class incurred by the utility during the year. The true-up adjustment must be computed annually for each class by dividing the true-up amount by the forecasted sales volumes and applied to billings during the next 12-month period beginning on September 1 each year, provided that the adjustment has been filed under Minnesota Rule 7825.2910, subpart 3.

⁷ Minnesota Rule 7820.4000, subpart 1 provides that "[w]hen a customer has been overcharged or undercharged as a result of incorrect reading of the meter, incorrect application of rate schedule, incorrect connection of the meter, application of an incorrect multiplier or constant or other similar reasons, the

under Minnesota Rules 7825.2920, subpart 2⁸; if the Commission concludes that rule variances are required to effectuate the proposed adjustment, MERC's proposal meets the requirements for such variances under Minn. R. 7829.3200.⁹

Minnesota Rule 7829.3200 provides that the Commission shall grant a variance to its rules when it determines that the following requirements are met:

- A. enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule;
- B. granting the variance would not adversely affect the public interest; and
- C. granting the variance would not conflict with standards imposed by law.

Each of these requirements is met under the circumstances.

1. *Excessive Burden*

First, enforcement of applicable rules to prevent MERC from incorporating the over-collected Viking rates in the true-up calculation would impose an excessive burden upon MERC and its ratepayers by delaying the refund of these amounts to customers based on actual gas costs incurred. Allowing the Company to incorporate these rate adjustments for the current gas year into the true-up calculation ensures customers are refunded for any amounts collected in excess of actual Viking gas costs incurred to provide service. Further, addressing these

amount of the overcharge shall be refunded to the customer or the amount of the undercharge may be billed to the customer as detailed in subparts 2 through 4." With respect to the Viking rates, MERC did charge the correct rates in accordance with filed PGAs.

⁸ Minnesota Rule 7825.2920, subpart 2 provides that "errors made in adjustment must be refunded by check or credits to bills to the consumer in an amount not to exceed the amount of the error plus interest computed at the prime rate upon the order of the commission if (1) the order is served within 90 days after the receipt of the filing defined in part 7825.2900 or 7825.2910 or at the end of the next major rate proceeding, whichever is later, and (2) the amount of the error is greater than five percent of the corrected adjustment charge." This provision is inapplicable as the difference between the billed rates and cost of gas for this period is less than five percent of the corrected adjustment charge.

⁹ Notably, the Commission has previously granted variances to Minn. R. 7825.2910, Minn. R. 7825.2700, Minn. R. 7825.2920, and Minn. R. 7820.4000 in cases where utilities propose to correct for allocation, cost, or assignment errors or adjustments. For example, in Docket Nos. G999/AA-14-580, G011/AA-14-754 and G011/AA-14-755, MERC requested and was granted variances to address two prior-period errors that were identified. *In the Matter of the Review of the 2013-2014 Annual Automatic Adjustment Reports and Annual Purchased Gas Adjustment True-up Filings*, Docket No. G999/AA-14-580, ORDER ACCEPTING GAS UTILITIES' ANNUAL AUTOMATIC ADJUSTMENT REPORTS AND 2013-2014 TRUE-UP PROPOSALS AND SETTING FURTHER REQUIREMENTS at 4-6 (Aug. 24, 2015) (Order also filed in Docket Nos. G011/AA-14-754 and G011/AA-14-755).

adjustments through the true-up adjustment rather than through individual customer bill credits is consistent with the stated purpose of the automatic adjustment rules, which is to enable gas utilities to adjust rates to reflect changes in the cost of energy delivered to customers from those costs authorized by the Commission in the utility's most recent general rate case.¹⁰ Requiring individual bill credits for these adjustments would be administratively difficult and would result in insignificant bill impacts in the majority of cases subject to rounding errors. The impact of this true-up adjustment to account for actual Viking rates is small—approximately \$23,000—with an average rate impact of \$0.63 per customer. Requiring MERC to account for this adjustment through individual customer bill credits would impose an excessive burden, requiring significant system programming and administrative expense. MERC's proposal ensures that General Service and Firm/Interruptible sales customers are appropriately refunded for Viking gas costs collected in excess of actual costs incurred and would avoid the confusion and potential for errors associated with the calculation and application of credits to individual accounts.

2. Public Interest

Second, granting a variance would not adversely affect the public interest. Allowing MERC to incorporate this adjustment in the true-up ensures customers are refunded for amounts collected in excess of actual gas costs, in accordance with the Commission's PGA rules, and is consistent with the public interest.

3. No Conflict with Law

Finally, granting any necessary variances would not conflict with standards imposed by law. MERC is not aware of any laws that would be violated by the Commission's approval of the proposal to address this change in Viking rates.

¹⁰ Minn. R. 7825.2390.

CONCLUSION

MERC respectfully requests that the Commission approve the Annual True-up as filed, including the Company's proposal to account for actual Viking gas costs for the period January 1, 2020, through June 30, 2020, and approve any rule variances necessary to implement these adjustments.

DATED: September 1, 2020

Respectfully submitted,

MINNESOTA ENERGY RESOURCES
CORPORATION

By: /s/ Joylyn C. Hoffman Malueg
Joylyn C. Hoffman Malueg
2685 145th Street West
Rosemount, MN 55068
Telephone: (414) 221-4208

MERC-Consolidated

<p>ANNUAL TRUE-UP REPORT MINNESOTA RULE 7825.2910</p>

SEPTEMBER 1, 2020

Summary of Schedules

Schedule True-up, Page 1 of 3

This schedule shows the prior period gas costs incurred and recovered. The 2018-2019 gas costs to be recovered as shown on line 1 are the numbers currently pending approval by the Commission in Docket No. G011/AA-19-401 on the Minnesota Energy Resources Corporation-Consolidated (“MERC-Consolidated”) system.

This schedule also shows the current period July 2019 through June 2020 gas costs incurred compared to recovery and the current period (over)/under recovery on the MERC-Consolidated Purchased Gas Adjustment (“PGA”) system as identified in the Annual Automatic Adjustment Report filed concurrently in Docket No. G999/AA-20-172.

Line 7 shows the (over)/under recovery for both the prior period and the current period.

Line 8 shows the projected sales for the 12 months ended August 31, 2021, used for calculating the true-up factors.

Line 9 shows the true-up factor per therm by class calculated for MERC-Consolidated which will be in effect as of September 1, 2020.

Schedule True-up, Page 2 of 3

This schedule shows the prior period gas cost true-up factor recovery for the 12 months ended June 2020.

Schedule True-up, Page 3 of 3

The final section on this schedule shows the calculation of the MERC-Consolidated PGA system sales projection for the period September 2020 through August 2021 used in the calculation of the 2019-2020 true-up factors as shown on Schedule True-up, Page 1 of 3.

MINNESOTA ENERGY RESOURCES - Consolidated

12 MONTHS ENDED JUNE 2020

GAS COST TRUE-UP TO BE APPLIED FOR A 12 MONTH PERIOD BEGINNING SEPTEMBER 1, 2020

True-up

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8/16/2020

Line					
No.	Description	GS	Commodity Interruptible F/I	Demand F/I	TOTAL

True-up of Prior Period Gas Cost Recovery

ACA

1.	2018-2019 Gas Cost to be Recovered ¹	(\$1,392,852)	\$97,966	(\$0)	(\$1,294,886)
2	Gas Costs Recovered thru True-up 7/1/19 - 6/30/20	(\$1,485,130)	\$80,282	(\$0)	(\$1,404,848)
3	(Over)/Under Recovery Carried Forward	\$92,278	\$17,684	(\$0)	\$109,962

True-up of Current Period Gas Costs Jul 19 - Jun 20

PGA

4	2019-2020 Gas Costs Incurred	\$15,860,109	\$1,509,476	\$17,182	\$17,386,768
5	2019-2020 Gas Costs Recovered	\$17,024,798	\$1,539,699	\$17,182	\$18,581,679
6	(Over)/Under Recovery	(\$1,164,689)	(\$30,222)	\$0	(\$1,194,911)

Calculation of 2019-2020 Gas Cost Adj. Factor - ACA

7	(Over)/Under Recovery to be (Credited)/Surcharge	(\$1,072,411)	(\$12,538)	(\$0)	(\$1,084,949)
8	Projected therm Sales for 12 Months Sept 20 - Aug 21	54,153,429	9,714,046	6,960	63,867,475
9	2020 - 2021 Gas Cost True-Up Factor per therm, Sept 20 - Aug 21	(\$0.01980)	(\$0.00129)	(\$0.00000)	

1 This is the (Over)/Under Recovery to be (Credited)/Surcharge reported on line 7, page 1 of 3 of the MERC-Consolidated true-up filing in docket #G011/AA-19-401.

Note: Due to rounding and other considerations, the total amounts reported may not aggregate in total for the month and/or year.

MINNESOTA ENERGY RESOURCES - Consolidated

12 MONTHS ENDED JUNE 2020

Prior Period Gas Cost True-up Factor Recovery - ACA Recovery

True-up

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Class	Prior Period Adjustment	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Total
CON Dth														
GS	0	81,151	74,432	97,291	256,352	544,789	769,033	968,361	825,013	765,540	535,415	308,519	134,047	5,359,943
Interruptible & F/I-Comm	0	13,714	13,804	16,168	20,282	51,411	114,788	93,982	99,579	92,734	69,680	49,583	25,516	661,240
F/I-Dem		58	58	58	58	58	58	58	58	58	58	58	58	696
Total CON Dth	0	94,923	88,294	113,517	276,692	596,259	883,879	1,062,400	924,650	858,332	605,153	358,161	159,621	6,021,879
CON ACA Factors														
GS		0.2053	0.2053	(0.2915)	(0.2915)	(0.2915)	(0.2915)	(0.2915)	(0.2915)	(0.2915)	(0.2915)	(0.2915)	(0.2915)	
Interruptible & F/I-Comm		0.3036	0.3036	0.1135	0.1135	0.1135	0.1135	0.1135	0.1135	0.1135	0.1135	0.1135	0.1135	
F/I-Dem		(0.0001)	(0.0001)	(0.0002)	(0.0002)	(0.0002)	(0.0002)	(0.0002)	(0.0002)	(0.0002)	(0.0002)	(0.0002)	(0.0002)	
True-up \$														
GS	\$0	\$16,660	\$15,281	(\$28,360)	(\$74,727)	(\$158,806)	(\$224,173)	(\$282,277)	(\$240,491)	(\$223,155)	(\$156,073)	(\$89,933)	(\$39,075)	(\$1,485,130)
Interruptible & F/I-Comm	\$0	\$4,163	\$4,191	\$1,835	\$2,302	\$5,835	\$13,028	\$10,667	\$11,302	\$10,525	\$7,909	\$5,628	\$2,896	\$80,282
F/I-Dem		(\$0.01)	(\$0.01)	(\$0.01)	(\$0.01)	(\$0.01)	(\$0.01)	(\$0.01)	(\$0.01)	(\$0.01)	(\$0.01)	(\$0.01)	(\$0.01)	(\$0)
Total \$	\$0	\$20,824	\$19,472	(\$26,525)	(\$72,425)	(\$152,971)	(\$211,145)	(\$271,610)	(\$229,189)	(\$212,630)	(\$148,165)	(\$84,306)	(\$36,179)	(\$1,404,848)

Note: Due to rounding and other considerations, the total amounts reported may not aggregate in total for the month and/or year.

MINNESOTA ENERGY RESOURCES - Consolidated

True-up

Page 3 of 3

8/16/2020

SALES PROJECTION FOR SEPTEMBER '20 THROUGH AUGUST '21*

Dths

Class	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	12 months Total
GS	183,704	258,121	487,085	757,363	1,048,712	895,972	690,628	400,472	238,613	159,195	145,393	150,085	5,415,343
Interruptible	43,923	62,609	144,318	125,205	129,686	90,844	120,311	40,667	94,224	14,633	36,690	42,281	945,393
Firm/Interruptible	1,209	1,723	3,971	3,445	3,568	2,500	3,310	1,119	2,593	403	1,010	1,163	26,012
Total	<u>228,836</u>	<u>322,453</u>	<u>635,374</u>	<u>886,012</u>	<u>1,181,966</u>	<u>989,316</u>	<u>814,249</u>	<u>442,258</u>	<u>335,430</u>	<u>174,231</u>	<u>183,093</u>	<u>193,529</u>	<u>6,386,747</u>

Note: Due to rounding and other considerations, the total amounts reported may not aggregate in total for the month and/or year.

In the Matter of the Annual Automatic
Adjustment Report of Minnesota Energy
Resources Corporation, MERC-NNG and
MERC-Consolidated

Docket No. G011/AA-20-656

CERTIFICATE OF SERVICE

I, Colleen T. Sipiorski, hereby certify that on the 1st day of September, 2020, on behalf of Minnesota Energy Resources Corporation ("MERC"), I electronically filed a true and correct copy of the enclosed Annual Automatic Adjustment Report of MERC – Consolidated 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 1st day of September, 2020.

/s/ Colleen T. Sipiorski
Colleen T. Sipiorski

[illegible]

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lisa	Peterson	lisa.r.peterson@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-172_AA-20-172
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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_20-172_AA-20-172
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Andrew	Sudbury	Andrew.Sudbury@CenterPointEnergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall PO Box 59038 Minneapolis, MN 55459-0038	Electronic Service	No	OFF_SL_20-172_AA-20-172
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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	No	GEN_SL_Minnesota Energy Resources Corporation (HOLDING)_2019-2020 MERC AAA True Up
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