

MICHAEL J. AHERN Partner (612) 340-2881 FAX (612) 340-2643 ahern.michael@dorsey.com

August 26, 2014

VIA ELECTRONIC MAIL

COMPLIANCE FILING

Burl W. Haar Executive Secretary Minnesota Public Utilities Commission 121 Seventh Place East, Suite 350 St. Paul, MN 55101

> Re: In the Matter of the Application of Minnesota Energy Resources Corporation for Authority to Increase Rates for Natural Gas Service in Minnesota MPUC Docket No. G-011/GR-13-617 OAH Docket No. 8-2500-31126

Dear Dr. Haar:

On August 25, 2014, Minnesota Energy Resources Corporation ("MERC") filed revised schedules including revised rate base, income statement, and revenue requirement summary, a schedule of the class revenue allocations and all billing determinants, and bridge schedules, that reflect the test year revenue requirement and rate design recommended by the Administrative Law Judge in his August 12, 2014 Findings of Fact, Summary of Public Testimony, Conclusions of Law and Recommendation in the above matter. It was brought to MERC's attention that a number on Page 3 of Schedule A, Revised Financial Schedules, was unreadable. MERC is therefore refiling a new version of Attachment A that is fully readable. Additionally, the Department of Commerce, Division of Energy Resources requested that MERC file its updated bad debt expense calculation based on the recommendations of the ALJ. This calculation is attached as Attachment D.

Please contact me at 612-340-2881 if you have any questions regarding this matter.

Sincerely yours,

/s/ Michael J. Ahern____

Michael J. Ahern

cc: Service List

ATTACHMENT A

Minnnesota Energy Resources Corporation Docket No. G011/GR-13-617 OAH Docket No. 8-2500-31126 Attachment A Page 1 of 8

MERC Revenue Requirements Summary Test Year Ending December 31, 2014

Line No.	Description	MERC's Filing	ALJ 8/12/2014
		(a)	(b)
1	Average Rate Base	\$198,314,568	\$191,993,874
2	Rate of Return After Adjustments	8.0092%	7.5262%
3	Required Operating Income	\$15,883,387	\$14,449,843
4	Operating Income	\$7,557,332	\$14,585,561
5	Income Deficiency	\$8,326,055	(\$135,718)
6	Gross Revenue Conversion Factor	1.7040	1.7040
7	Gross Revenue Deficiency	\$14,187,597	(\$231,264)
8	Change from Petitioner's Filing		(\$14,418,861)

MERC Rate Base Summary Test Year Ending December 31, 2014

Line		MERC	ALJ	ALJ
No.	Description	Filing	Adjustments	Position
		(a)	(b)	(C)
	PLANT IN SERVICE			
1	Energy	\$999,429	\$0	\$999,429
2	Transmission	\$6,833,452	\$0	\$6,833,452
3	Distribution	\$368,477,466	\$0	\$368,477,466
4	Customer	\$5,206,114	\$0	\$5,206,114
5	Total Plant In Service	\$381,516,461	\$0	\$381,516,461
	RESERVE FOR DEPRECIATION			
6	Energy	\$326,488	\$0	\$326,488
7	Transmission	\$3,072,997	\$0	\$3,072,997
8	Distribution	\$164,797,536	\$0	\$164,797,536
9	Customer	\$1,700,703	\$0	\$1,700,703
10	Total Reserve For Depreciation	\$169,897,724	\$0	\$169,897,724
	NET PLANT IN SERVICE			
11	Energy	\$672,941	\$0	\$672,941
12	Transmission	\$3,760,455	\$0	\$3,760,455
13	Distribution	\$203,679,930	\$0	\$203,679,930
14	Customer	\$3,505,411	\$0	\$3,505,411
15	Total Net Plant In Service	\$211,618,737	\$0	\$211,618,737
16	Construction Work in Progress	\$0	\$0	\$0
17	LESS: Customer Advances	\$0	\$0	\$0
18	LESS: Accumulated Deferred Income Taxes	\$36,631,519	\$0	\$36,631,519
10	Working Capital:		¢500.000	
19	Cash Working Capital	(\$3,908,368)	\$592,238	(\$3,316,130)
20	Deferred Taxes Other than Plant, M&S	(\$3,140,462)	\$4,834,648	\$1,694,186
21	Non-Utility Adjustment	(\$1,530,328)	\$0 (#0.000)	(\$1,530,328)
22	Plant Adjustment	(\$29,112)	(\$6,633)	(\$35,745)
23	Total Working Capital	(\$8,608,270)	\$5,420,253	(\$3,188,017)
24	Materials and Supplies	\$279,572	\$0	\$279,572
24 25	Gas Storage	\$12,013,242	\$853,699	\$12,866,941
25 26	Regulatory Assets/Liabilities	\$19,642,806	(\$12,594,646)	\$7,048,160
20 27	Subtotal	\$31,935,620	(\$12,594,646)	\$20,194,673
21	Jubiolal	φ31,333,020	$(\psi^{+}, 740, 347)$	Ψ20,134,073
28	TOTAL AVERAGE RATE BASE	\$198,314,568	(\$6,320,694)	\$191,993,874

Minnnesota Energy Resources Corporation Docket No. G011/GR-13-617 OAH Docket No. 8-2500-31126 Attachment A Page 3 of 8

MERC Rate Base Adjustments Test Year Ending December 31, 2014

PLANT IN SERVICE (a) (b) (c) (d) (e) (f) 1 Energy Transmission 3 Distribution 4 Customer \$ <th>Line No.</th> <th>Description</th> <th>Service Extensions</th> <th>Reg Assets and Liab</th> <th>Unamortized Rate Case Expense</th> <th>Gas Storage</th> <th>CWC</th> <th>ALJ Total Adjustments</th>	Line No.	Description	Service Extensions	Reg Assets and Liab	Unamortized Rate Case Expense	Gas Storage	CWC	ALJ Total Adjustments
1 Energy 2 Transmission 3 Distribution 4 Customer 5 Total Plant In Service 8 Distribution 9 Customer 10 Total Plant In Service 9 Customer 10 Total Reserve For Depreciation 9 Customer 10 Total Reserve For Depreciation 11 Energy 12 Transmission 13 Distribution 9 Customer 11 Energy 12 Transmission 13 Distribution 14 Customer 15 Total Plant In Service 16 Construction Work in Progress 17 LESS: Accumulated Deferred Income Taxes Working Capital S4,294,542 19 Cash Working Capital 19 Cash Working Capital 10 Total Working Capital 11 S6,633) 12 Plant Adjustment 13 Distruction lintere		·	(a)	(b)	(c)	(d)	(e)	(f)
2 Transmission 3 Distribution 4 Customer 5 Total Plant In Service 8 S0 8 Distribution 9 Customer 10 Total Reserve For Depreciation 9 Customer 10 Total Reserve For Depreciation 9 Customer 10 Total Reserve For Depreciation 11 Energy 12 Transmission 13 Distribution 9 Customer 10 Total Reserve For Depreciation 10 Total Reserve For Depreciation 11 Energy 11 Energy 12 Transmission 13 Distribution 14 Customer 15 Total Net Plant In Service 15 Total Net Plant In Service 16 Construction Work in Progress 17 LESS: Accumulated Deferred Income Taxes Working Capital \$4,294,542 19 Cash Working Capital 1								\$ 0
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6 Energy 7 Transmission 8 Distribution 9 Customer 10 Total Reserve For Depreciation 10 Total Reserve For Depreciation 11 Energy 12 Transmission 13 Distribution 14 Energy 15 Total Net Plant In Service 15 Total Net Plant In Service 16 Construction Work in Progress 17 LESS: Customer Advances 18 LESS: Accumulated Deferred Income Taxes Working Capital: \$4,294,542 19 Cash Working Capital 20 Deferred Taxes Other than Plant, M&S \$4,294,542 \$540,106 21 Non-Utility Adjustment 22 Plant Adjustment 23 Total Working Capital 24 Materials and Supplies 25 Gas Storage 26 Regulatory Assets/Liabilities 27 Subtotal			\$0	\$0	\$0	\$0	\$0	\$0
7 Transmission 8 Distribution 9 Customer 10 Total Reserve For Depreciation 10 Total Reserve For Depreciation 11 Energy 12 Transmission 13 Distribution 14 Energy 15 Total Net Plant In Service 16 Construction Work in Progress 17 LESS: Customer Advances 18 LESS: Accumulated Deferred Income Taxes Working Capital \$4,294,542 19 Cash Working Capital 20 Plant Adjustment 21 Plant Adjustment 22 Plant Adjustment 23 Total Working Capital 24 Materials and Supplies 25 Gas Storage 26 Regulatory Assets/Liabilities 27 Subtotal		RESERVE FOR DEPRECIATION						
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16 Construction Work in Progress 17 LESS: Customer Advances 18 LESS: Accumulated Deferred Income Taxes 19 Cash Working Capital 10 Deferred Taxes Other than Plant, M&S 21 Non-Utility Adjustment 22 Plant Adjustment 23 Total Working Capital 24 Materials and Supplies 25 Gas Storage 26 Regulatory Assets/Liabilities 27 Subtotal					\$U \$0			\$0 \$0
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27 Subtotal \$0 (\$11,281,942) (\$1,312,704) \$853,699 \$0 (\$11,74	26							(\$12,594,646)
	27	Subtotal	\$0			\$853,699	\$0	(\$11,740,947)
28 TOTAL AVERAGE RATE BASE (\$6,633) (\$6,987,400) (\$772,598) \$853,699 \$592,238 (\$6,32	28	TOTAL AVERAGE RATE BASE	(\$6,633)	(\$6,987,400)	(\$772,598)	\$853,699	\$592,238	(\$6,320,694)

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MERC Operating Income Summary Test Year Ending December 31, 2014

Line		MERC	ALJ	ALJ
No.	Description	Filing	Adjustments	Position
		(a)	(b)	(c)
	UTILITY OPERATING REVENUES			
1	Natural Gas Revenue	\$257,186,462	\$50,235,577	\$307,422,039
2	Late Payment Revenue	\$525,000	\$0	\$525,000
3	Other Revenue	\$234,470	\$51,493	\$285,963
4	Total Operating Revenues	\$257,945,932	\$50,287,070	\$308,233,002
	UTILITY EXPENSES	•		
5	Cost of Gas	\$173,412,058	\$38,873,289	\$212,285,347
6	Production	\$10,636	\$0	\$10,636
7	Gas Supply	\$704,365	\$0	\$704,365
8	Transmission	\$94,181	\$0	\$94,181
9	Distribution	\$17,894,619	(\$165,000)	\$17,729,619
10	Customer Accounts	\$11,801,783	(\$45,702)	\$11,756,081
11	Customer Services	\$927,914	\$0	\$927,914
12	Sales	\$0	\$0	\$0
13	Administrative & General	\$15,998,503	(\$861,800)	\$15,136,703
14	Subtotal Operating Expenses	\$220,844,059	\$37,800,787	\$258,644,846
	-			
15	Depreciation	\$9,347,278	\$0	\$9,347,278
16	Amortization	\$9,656,957	\$464,978	\$10,121,935
17	Taxes Other Than Income	\$8,896,360	(\$118,260)	\$8,778,100
18	Other Interest Expense	\$935		\$935
19	Subtotal	\$27,901,530	\$346,718	\$28,248,248
	-			
20	Federal Income Taxes 31.602%	\$1,839,225	\$3,836,345	\$5,675,570
21	State Income Taxes 9.708%	(\$296,377)	\$1,178,509	\$882,132
22	Michigan State Tax	\$1,384		\$1,384
23	Subtotal Income Taxes	\$1,544,232	\$5,014,854	\$6,559,086
24	Tax Effect of Interest Synchronization	\$98,779	\$96,482	\$195,261
25	Total Income Taxes	\$1,643,011	\$5,111,336	\$6,754,347
	-	· · · ·		
26	Total Operating Expenses	\$250,388,600	\$43,258,841	\$293,647,441
27	Adjusted Net Operating Income	\$7,557,332	\$7,028,229	\$14,585,561

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MERC Operating Income Adjustments Test Year Ending December 31, 2014

Line No.	Description	Post Retirement Expense	Pension Expense	Sales Forecast	Property Taxes	CIP Amortization	CIP Revenues	Uncollectible Expense	Executive Incentive	Miscellaneous Revenues		Charitable Contributions	Travel and Entertainment	Corporate Aircraft	Mapping Project	ICE Deferral	Interest Sync	ALJ Adjustments
110.	Description	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(I)	(m)	(n)	(o)	(p)	(q)
	UTILITY OPERATING REVENUES																	
1	Natural Gas Revenue			\$40,839,155			\$9,396,422											\$50,235,577
2	Late Payment Revenue																	\$0
3	Other Revenue	^	^	A 40 000 455	^	^	* *****	* 2	^	\$51,493	* 2	^	^	^	^	^	^	\$51,493
4	Total Operating Revenues	\$0	\$0	\$40,839,155	\$0	\$0	\$9,396,422	\$0	\$0	\$51,493	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$50,287,070
	UTILITY EXPENSES																	
5	Cost of Gas			\$38,873,289														\$38,873,289
6	Production																	\$0
7	Gas Supply																	\$0
8	Transmission																	\$0
9	Distribution														(\$165,000)			(\$165,000)
10	Customer Accounts							\$276,524								(\$322,226)		(\$45,702)
11	Customer Services																	\$0
12	Sales																	\$0
13	Administrative & General	(\$140,720)	(\$668,392)						(\$27,857)			(\$16,105)	(\$7,770)	(\$956)				(\$861,800)
14	Subtotal Operating Expenses	(\$140,720)	(\$668,392)	\$38,873,289	\$0	\$0	\$0	\$276,524	(\$27,857)	\$0	\$0	(\$16,105)	(\$7,770)	(\$956)	(\$165,000)	(\$322,226)	\$0	\$37,800,787
15	Depreciation																	\$0
16	Amortization					\$475,941					(\$10,963)							\$464,978
17	Taxes Other Than Income				(\$118.260)	Ф 11 0,0 11					(\$10,000)							(\$118,260)
18	Subtotal	\$0	\$0	\$0	(\$118,260)	\$475,941	\$0	\$0	\$0	\$0	(\$10,963)	\$0	\$0	\$0	\$0	\$0	\$0	\$346,718
40	Fadaral la sana Tauna 04 00001	¢ 4 4 470	\$011.0CT	\$004 OF 2	¢07.070	(0450 407)	\$0.000 45T	(007.007)	* 0.000	¢40.070	¢0.405	A E 000	0 455	\$000	*50.4.10	\$101.0CC	.	*** ****
19	Federal Income Taxes 31.602%	\$44,470	\$211,225	\$621,253		(\$150,407)		(\$87,387)	\$8,803	\$16,273	\$3,465	\$5,090	\$2,455	\$302	\$52,143	\$101,830	\$0	\$3,836,345
20	State Income Taxes 9.708%	\$13,661	\$64,887	\$190,846	\$11,481	(\$46,204)	\$912,205	(\$26,845)	\$2,704	\$4,999	\$1,064	\$1,563	\$754	\$93	\$16,018	\$31,282	\$0	\$1,178,509
21	Michigan State Tax	()(\$070 440	\$040,000	¢ 40.050	(\$400.044)	\$0,004,000	(\$444.000)	¢44.500	¢04.070	¢ 4 500	* 0.050	\$0.010	¢005	¢00.400	¢400.440	* 0	\$0
22	Subtotal Income Taxes Tax Effect of Interest Synchronizatio	\$58,131	\$276,113	\$812,099	\$48,853	(\$196,611)	\$3,881,662	(\$114,232)	\$11,508	\$21,272	\$4,529	\$6,653	\$3,210	\$395	\$68,162	\$133,112	\$0 \$96.482	\$5,014,854 \$96,482
23 24	Total Income Taxes	\$58,131	\$276,113	\$812.099	\$48.853	(\$100.011)	\$3.881.662	(\$114.232)	\$11.508	\$21,272	\$4,529	\$6.653	\$3,210	\$395	\$68,162	\$133.112	\$96,482 \$96,482	\$90,482
24	TULAI INCOME TAXES	400, IST	φ∠10,113	⊅ 01∠,099	40,053	(JI0,081¢)	φ3,881,862	(\$114,232)	80c,11¢	⊅∠1,∠1 2	 φ4,529	\$C0,0¢	\$3,21U	\$ 382	300,102	φ133,11Z	⊅90,40 Ζ	90,111,000
25	Total Operating Expenses	(\$82,589)	(\$392,279)	\$39,685,388	(\$69,407)	\$279,330	\$3,881,662	\$162,292	(\$16,349)	\$21,272	(\$6,434)	(\$9,452)	(\$4,560)	(\$561)	(\$96,839)	(\$189,114)	\$96,482	\$43,258,841
26	Adjusted Net Operating Income	\$82,589	\$392,279	\$1,153,767	\$69,407	(\$279,330)	\$5,514,760	(\$162,292)	\$16,349	\$30,221	\$6,434	\$9,452	\$4,560	\$561	\$96,839	\$189,114	(\$96,482)	\$7,028,229
													•					

() = Reduction.

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MERC Interest Synchronization Adjustment Test Year Ending December 31, 2014

1		MERC's Filing	ALJ Position	ALJ Adjustment
Line No.	-	(a)	(b)	(c)
1	Rate Base	\$198,314,568	\$191,993,874	(\$6,320,694)
2	Weighted Cost of Short- & Long-term Debt	2.6008%	2.6008%	
3	MERC-MN Interest	\$5,157,779	\$4,993,390	
4	Interest included in income tax accruals	\$5,326,082	\$5,326,082	
5	Additional interest allowed (denied)	(\$168,303)	(\$332,692)	
6	Tax effect of interest allowed (denied)	\$98,779	\$195,261	\$96,482

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MERC Cash Working Capital (CWC) Adjustment Test Year Ending December 31, 2014

Line No. Description	MERC Filing Test Year Expense	ALJ Expense Adjustments	ALJ Adjusted Expenses	ALJ Expense per day using 365 days per Year	ALJ # of Lead Days	ALJ # of Lag Days	ALJ Net Lag Days	ALJ Net lag dollars	MERC Direct Net lag dollars	CWC Adj. MERC
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)
Operating Expense:										
1 Purchase Gas Expense	\$173,412,058	\$38,873,289	\$212,285,347	\$581,604	44.3	40.2	4.1	\$2,384,575	\$1,928,190	\$456,385
2 Internal Payroll Excluding Incentive	\$13,056,431	(\$320,265)	\$12,736,166	\$34,894	44.3	13.0	31.3	\$1,092,170	\$1,117,461	(\$25,291)
3 Payroll Taxes	\$1,589,788		\$1,589,788	\$4,356	44.3	14.0	30.3	\$131,974	\$131,710	
4 MERC Internal Incentive Plan	\$688,744	(\$15,061)	\$673,683	\$1,846	44.3	248.5	-204.2	(\$376,894)	(\$385,398)	\$8,504
5 O&M Expense Paid to Affiliates except Interest ex	\$24,902,143		\$24,902,143	\$68,225	44.3	35.2	9.1	\$620,848	\$617,446	\$3,402
6 Other O&M Expense	\$8,810,073	(\$737,176)	\$8,072,897	\$22,118	44.3	30.0	14.3	\$316,281	\$344,160	(\$27,879)
7 Total CWC Deficit (Available)	\$222,459,237	\$37,800,787	\$260,260,024	\$713,041				\$4,168,954	\$3,753,569	\$415,121
8 Operating Expense in MERC's income statement	\$222,433,847									
9 Difference amount allocated to MI in rate case	\$25,390									
10 Property Tax	\$7,314,733	(\$118,260)	\$7,196,473	\$19,716	44.3	409.3	-365.0	(\$7,196,473)	(\$7,314,733)	\$118,260
11 State Income Tax	\$1,186,701	(\$327,056)	\$859,645	\$2,355	44.3	54.3	-10.0	(\$23,552)	(\$32,678)	\$9,126
12 Federal Income Tax	\$6,663,789	(\$1,061,291)	\$5,602,498	\$15,349	44.3	62.0	-17.7	(\$271,683)	(\$322,332)	\$50,649
13 Total Income Taxes	\$7,850,490		\$6,462,144			Total Income & P	roperty Taxes	(\$7,491,708)	(\$7,669,743)	\$178,035
14 Net CWC (Available) Deficit								(\$3,322,754)	(\$3,916,174)	\$593,420
15 MN Allocator								99.8007%	99.8007%	99.8007%
16 MERC MN								(\$3,316,131)	(\$3,908,368)	\$592,238

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MERC Cash Working Capital Workpaper Test Year Ending December 31, 2014 Rebuttal

Line No. 1 2 3	Description Internal Payroll Excluding Incentive MERC Internal Incentive Plan All Other O&M Expense	DOC Direct O&M Expenses (a) \$14,646,219 \$688,744 \$33,712,216	% of Total (b) 29.86% 1.40% 68.73%
4	Total	\$49,047,179	100.00%
		MERC Rebuttal Expense Adjustments	
5	Production	\$0	
6	Gas Supply	\$0	
7	Transmission	\$0	
8	Distribution	(\$165,000)	
9	Customer Accounts	(\$45,702)	
10	Customer Services	\$0	
11	Sales	\$0	
12	Administrative & General	(\$861,800)	
13	Total	(\$1,072,502)	
14 15 16 17	Internal Payroll Excluding Incentive MERC Internal Incentive Plan All Other O&M Expense Total	(\$320,265) (\$15,061) (\$737,176) (\$1,072,502)	

ATTACHMENT D

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Minnesota Energy Resources Corporation

	201	4 Uncollectik	ole Expense			
Line			2011	2012	2013	2011-2013
No.			Actual	Actual	Actual	Average
1	Uncollectible Expense	\$	1,984,374	\$ 1,313,501	\$ 1,481,318	\$ 1,593,064
2	Tariffed Revenues	\$	255,269,107	\$ 200,736,162	\$ 269,448,208	\$ 241,817,826
3	% of Tariffed Revenues		0.777365%	0.654342%	0.549760%	0.658787%
4						
5	Intial Filing					\$ 257,186,462
6	Updated Sales (Margin)					\$ 1,965,866
7	Updated Base Cost of Gas					\$ 38,873,289
8	Proposed Increase					\$ 12,000,000
9	Total Revenues					\$ 310,025,617
10						
11	Test Year Uncollectible Expense (Line 3 * Line 9)					\$ 2,042,408

AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)) ss COUNTY OF HENNEPIN)

Kristin M. Stastny hereby certifies that on the 26th day of August, 2014, on behalf of Minnesota Energy Resources Corporation (MERC) she electronically filed a true and correct copy of MERC's Compliance Filing – Revised Schedules on <u>www.edockets.state.mn.us</u>. Said document was also served via U.S. mail and electronic service as designated on the attached service list.

<u>/s/ Kristin M. Stastny</u> Kristin M. Stastny

Subscribed and sworn to before me this 26th Day of August, 2014.

<u>/s/ Alice Jaworski</u> Notary Public, State of Minnesota

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