

Revised Decision Alternatives for Staff Briefing Papers in Docket No. 13-617 – MERC's Compliance Filing

1. Authorize MERC to implement its final rates from the Commission October 28, 2014 Order on April 1, 2015; or
2. Authorize MERC to implement its final rates from the Commission October 28, 2014 Order on some other date, for example, May 1, 2015.

Department Recommendations

3. Require MERC to resubmit the CIP tracker account Order requirements (Schedule F) for the entire interim rate period within 10 days after the actual date final rates become effective and separately reflect the following adjustments:
 - a) include the entire interim period, currently projected to end March 31, 2015; and
 - b) for the revised Northshore Mining CIP calculations; and
 - c) for the CIP under-recovery caused by the initial interim period CCRC factor being lower than the revised CIP CCRC factor of \$0.02248 for the entire interim period, currently projected to end March 31, 2015; and
4. Approve MERC's refund plan; and
5. Require MERC to submit, within 10 days of the completion of the refund for all of its customers, a compliance filing that separately shows the actual refunds and interest paid by rate class including supporting calculations.

Additional PUC Staff Recommendations

6. Require MERC in future rate cases to file its rate and revenue schedules both with and without the base cost of gas revenues. or
7. Do not require MERC in future rate cases to file its rate and revenue schedules both with and without the base cost of gas revenues.
8. Require MERC in future rate case filings, to file its proposed CIP applicable Distribution Rates at a level high enough to cover the proposed CCRC factor. or
9. Do not require MERC in future rate case filings, to file its proposed CIP applicable Distribution Rates at a level high enough to cover the proposed CCRC factor.
10. Require MERC to engage an independent third party auditor to review its customer billing system to ensure that all CIP charges are applied in accordance with its tariff. or
11. Require MERC to file additional *Comments* in this proceeding that provide a detailed explanation of the steps MERC took when it reviewed the billing system. or

12. Do not require MERC to engage an independent third party auditor to review its customer billing system to ensure that all CIP charges are applied in accordance with its tariff. Do not require MERC to file additional *Comments* in this proceeding that provides a detailed explanation of the steps MERC took when it reviewed the billing system.
13. Approve MERC's suggestion and allow MERC to make the revised Northshore calculation adjustments in its "MERC CIP Tracker instead of the Department's recommendation to require MERC to make the additional adjustments in its MERC-PNG CIP tracker account and its MERC-Consolidated CIP tracker account.
14. Determine that the Iowa LDC is CIP and GAP applicable.
 - a. MERC is responsible, pursuant to the Commission "Billing Error Rule," for any over/under collections that occurred because MERC did not correctly bill the CCRA and GAP factors. Require MERC to reflect the CCRA impact in its compliance filing with the other CIP tracker adjustments; or
 - b. MERC is not responsible for any over/under collection that occurred because MERC did not correctly bill the CCRA and GAP factors.
15. Determine that the Iowa LDC is CIP and GAP exempt.
16. Require MERC to provide detailed *Comments* describing any Minn. Statutes, Minn. Rules, or any tariff provisions that would support a conclusion that the Iowa LDC is CIP and GAP exempt (including under Rate Schedule GS-1) within 30 days after the Order is issued. This would include a detailed discussion on:
 - a. any proposed tariff revisions; and
 - b. how to treat any under-collection of CCRA and GAP charges from the Iowa LDC' since the inception of service to this customer, and
17. Request the Department to provide comments in response to MERC's filing within 30 days of the filing date.