

October 26, 2016

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Response Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G022/M-16-494

Dear Mr. Wolf:

Attached are *Response Comments* of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Greater Minnesota Gas, Inc.'s Conservation Improvement Program Request for Cost Recovery (*Petition*)

The *Petition* was filed on June 1, 2016 by:

Kristine A. Anderson
Corporate Attorney
Greater Minnesota Gas, Inc.
202 S. Main Street
Le Sueur, MN 56068
(888) 931-3411

As discussed in greater detail in the attached *Response Comments*, the Department recommends that the Minnesota Public Utilities Commission (Commission) **approve the Greater Minnesota Gas, Inc.'s *Petition* with modifications**. The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ DANIELLE WINNER
Rates Analyst

DW/ja
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

RESPONSE COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET No. G022/M-16-494

I. BACKGROUND AND SUMMARY

On June 1, 2016, Greater Minnesota Gas, Inc. (GMG or the Company) submitted a filing in the present docket entitled *Conservation Improvement Program Request for Cost Recovery (Petition)* to the Minnesota Public Utilities Commission (Commission). The Company's *Petition* included:

- A request to enact a Conservation Adjustment, also called a Conservation Cost Recovery Adjustment (CCRA); and
- A proposed CCRA of \$0.18/decatherm (Dth).

The Minnesota Department of Commerce, Division of Energy Resources (Department) submitted initial comments on August 31, 2016, and requested that the Company:

- confirm that NGEA (Next Generation Energy Act) assessments for the full and correct amount were included in the 2015 CIP (Conservation Improvement Program) tracker; and
- provide a proposed customer notification.

The Department also proposed to recommend, upon receipt of the above information, the following to the Commission:

- 1) approve Greater Minnesota Gas's 2015 CIP tracker account activities as summarized in Table 2 in the Department's August 31, 2016 *Comments*;
- 2) require Greater Minnesota Gas to provide monthly data in all future CIP tracker/CCRA filings;
- 3) approve the proposed CCRA of \$0.18/Dth for all of Greater Minnesota Gas's Minnesota customer classes, to be effective January 1, 2017, or on the first billing cycle in the next full month after Commission approval, whichever is

later. The approval is conditioned on the Company submitting, within 10 days of the issue date of the *Order* in the present docket, a compliance filing with the relevant tariff sheets and necessary calculations that comply with the Commission's determinations; and

- 4) require the Company to submit annual CIP tracker and CCRA filings by May 1.

The Company submitted *Reply Comments* on September 9, 2016. In those *Reply Comments*, the Company noted that NGEA Assessments had not been included in the Company's initial figures. The Company provided an updated table that included NGEA assessments, but noted that it did not change the amount of the requested CCRA. The Company also clarified information regarding the Company's intent to request a financial incentive in future years, and also clarified that it does not currently have any CIP-exempt customers. Finally, the Company was not opposed to the recommendations of the Department, and agreed to implement the recommended changes in future years. On September 14, 2016, the Company submitted a final proposed customer notification.

II. DEPARTMENT CONCLUSIONS AND RECOMMENDATIONS

The Department concludes that all issues have been resolved, and recommends that the Commission:

- 1) approve Greater Minnesota Gas's 2015 CIP tracker account activities as summarized in Table 2 of the Department's August 31, 2016 Comments;
- 2) require Greater Minnesota Gas to provide monthly data in all future CIP tracker/CCRA filings;
- 3) approve the proposed CCRA of \$0.18/Dth for all of Greater Minnesota Gas's Minnesota customer classes, to be effective January 1, 2017, or on the first billing cycle in the next full month after Commission approval, whichever is later. The approval is conditioned on the Company submitting, within 10 days of the issue date of the *Order* in the present docket, a compliance filing with the relevant tariff sheets and necessary calculations that comply with the Commission's determinations; and
- 4) require the Company to submit annual CIP tracker and CCRA filings by May 1.

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
Response Comments**

Docket No. G022/M-16-494

Dated this 26th day of October 2016

/s/Sharon Ferguson

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