



Minnesota Energy Resources Corporation
2685 145th Street West
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www.minnesotaenergyresources.com

January 10, 2019

**PUBLIC DOCUMENT –TRADE SECRET
DATA HAS BEEN EXCISED**

VIA ELECTRONIC FILING

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101

Re: Reply Comments of Minnesota Energy Resources Corporation

In the Matter Minnesota Energy Resources Corporation's Petition for
Approval of a Change in Demand Entitlement for its NNG System,
Docket No. G011/M-18-526

In the Matter Minnesota Energy Resources Corporation's Petition for
Approval of a Change in Demand Entitlement for its Consolidated
System, Docket No. G011/M-18-527

Dear Mr. Wolf:

On December 31, 2018, the Department of Commerce, Division of Energy Resources (the "Department") filed Comments in the above-referenced dockets in response to Minnesota Energy Resources Corporation's ("MERC's" or the "Company's") Petitions for Approval of 2018-2019 Demand Entitlements for its Consolidated and Northern Natural Gas ("NNG") purchased gas adjustment ("PGA") systems. In its Comments, the Department recommended that the Minnesota Public Utilities Commission (the "Commission") accept MERC's proposed levels of demand entitlement and allow the Company to recover the associated costs through the monthly PGA effective November 1, 2018. Additionally, the Department requested that MERC provide the following additional information in Reply Comments:

- A detailed explanation of how the Company conducts planning at the town border station ("TBS") level, as well as what steps it takes to maintain reliability and to correct instances where consumption exceeds the MDQ; and
- The number of electric generators served, annual Dths consumed from 2014 – 2018, the TBS identifier for each customer, and the tariff under which each takes service.

Finally, with respect to NNG, the Department noted that the October 2018 rates included in MERC's Attachment 4 do not match the demand charge per therm included in MERC's October 2018 PGA and therefore provided a corrected cost comparison in Attachment 3 to its Comments.

MERC thanks the Department for its review and Comments and submits these Reply Comments to respond to the Department's requests for additional information.

Town Border Station Level Planning

First, with respect to the Department's request that MERC provide an explanation of how the Company conducts planning at the TBS level, MERC responds by noting that the Company does peak day planning at a system-wide level to ensure adequate transportation capacity and supply. At the TBS level, there are two considerations for planning: (1) physical TBS capacity and (2) contractual TBS capacity.

Physical TBS capacity is determined by pipeline pressure, distribution system pressure, and the physical size of the components at the TBS. Physical capacity issues are identified by MERC engineering and operations through a combination of historical performance and forecasted load additions. If MERC-owned components are the limiting factor at a TBS, the Company can address the shortfall with equipment replacement and distribution system investments. If the ability of the pipeline to provide adequate pressure to a TBS is the issue, then a pipeline project is often necessary (for example, with the Rochester Natural Gas Expansion Project, where NNG needed to undertake improvements to the interstate pipeline system).

Contractual TBS capacity can be related to physical capacity where a TBS is fully subscribed. In other cases, the physical system may be able to meet the peak load at a TBS, but the pipeline contract may not accurately reflect the utility's peak load. MERC gas supply does a high level review of TBSs where shortfalls may be present and then works with the appropriate pipeline to determine if capacity is available to be moved to the location or if system upgrades are required.

Electric Generation

Second, with respect to the Department's request that MERC provide the number of electric generators served, annual usage of those customers from 2014-2018, the TBS serving each customer, and tariff under which those customer takes service, MERC provides this information in Attachment A to these Reply Comments. The nonpublic version of Attachment A contains trade secret information that is not

Mr. Daniel P. Wolf
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generally known to and not readily ascertainable by vendors or competitors of MERC, who could obtain economic value from its disclosure. MERC maintains this information as secret.

It should be noted that the Commission approved MERC's proposal to establish Electric Generation customer classes in its December 26, 2018, Findings of Fact, Conclusions, and Order in Docket No. G011/GR-17-563. Those customer classes are interruptible and applicable to any customer using more than 50 percent of annual volumes for electric generation. Nomination of Firm/Interruptible service will remain available to Electric Generation customers.

Cost Comparison to October PGA

Finally, with respect to the revised cost comparison included in the Department's Attachment 3 to its Comments on the NNG Demand Entitlement, MERC notes that the Department's revised rates do not accurately capture MERC's October 2018 PGA rates as they do not reflect the revised base cost of gas rates or sales as approved in Docket No. G011/MR-17-564. The October PGA rates reflected in MERC's Attachment 4 inadvertently included the Annual Cost Adjustment ("ACA") factor, which accounts for the mismatch between the Company's filed PGA rates and the rates reflected in MERC's Attachment 4, Page 1. A revised Attachment 4, Page 1, excluding the ACA Factor, is included as Attachment B to these Reply Comments.

Please contact me at (920) 433-2926 if you have any questions regarding the information in this filing. Thank you for your attention to this matter.

Sincerely yours,



Seth DeMerritt
Senior Project Specialist
Minnesota Energy Resources Corporation

Enclosure
cc: Service List

PUBLIC DOCUMENT - TRADE SECRET DATA HAS BEEN EXCISED

[TRADE SECRET DATA BEGINS...

Customer No.	Account	Name	TBS Name	Annual Dekatherm Usage						
				Offering	Class	2014	2015	2016	2017	2018
1				MERC000009	Commercial Gas >1500 Therms	208	187	171	189	248
2				MERC000022	Commercial Large Volume Interruptible	207	665	1,521	521	562
3				MERC000022	Commercial Large Volume Interruptible	329	323	1,845	926	970
4				MERC000022	Commercial Large Volume Interruptible	1,047	791	874	709	759
5				MERC000022	Commercial Large Volume Interruptible	5,470	5,710	5,965	4,120	1,343
6				MERC000054	Transport Large Volume Interruptible CIP Exempt	85,472	398,195	448,197	286,785	373,921
7				MERC000059	SLVJ CIP Exempt Electric Power Generation	1,926,013	2,588,834	3,651,341	2,721,397	3,107,535
							2,018,746	2,994,705	4,109,914	3,014,647
Note: All listed customers are on the NNG PGA.										...TRADE SECRET DATA ENDS]

Note: All listed customers are on the NNG PGA.

...TRADE SECRET DATA ENDS]

Attachment_B

Attachment 4
Page 1 of 2

MINNESOTA ENERGY RESOURCES - NNG
RATE IMPACT OF THE PROPOSED DEMAND CHANGE
NOVEMBER 1, 2018

All costs in \$/Dth	Base Cost of Gas G011/MR-17-564 Jan 1, 2018	Demand Charge Oct 1, 2017	Demand Charge Demand Filing Nov 1, 2017	Most Recent PGA Oct 1, 2018	Proposed Effective Nov 1, 2018	Result of Proposed Change			
						Change from Last Rate Case	Change from Nov 1, 2017 Demand Filing	Change from Last PGA %	Change from Last PGA \$
1) General Service Residential: Avg. Annual Use: 88 Dth									
Commodity Cost	\$3.7406	\$3.2257	\$3.0201	\$3.4787	\$3.7371	(\$0.0035)	\$0.7170	7.43%	\$0.2584
Demand Cost	\$0.9361	\$0.9288	\$0.9328	\$0.9367	\$1.1467	\$0.2106	\$0.2139	22.42%	\$0.2100
Commodity Margin	\$2.6284	\$2.4116	\$2.4116	\$2.5727	\$2.5727	(\$0.0557)	\$0.1611	0.00%	\$0.0000
Total Cost of Gas	\$7.3051	\$6.5661	\$6.3645	\$6.9881	\$7.4565	\$0.1514	\$1.0920	6.70%	\$0.4684
Avg Annual Cost	\$642.85	\$577.82	\$560.08	\$614.95	\$656.17	\$13.33	\$96.10	6.70%	\$41.22
Effect of proposed commodity change on average annual bills:									\$22.74
Effect of proposed demand change on average annual bills:									\$18.48
2) Small Vol. Interruptible: Avg. Annual Use: 5,110 Dth									
Commodity Cost	\$3.7406	\$3.2257	\$3.0201	\$3.4787	\$3.7371	(\$0.0035)	\$0.7170	7.43%	\$0.2584
Demand Cost									
Commodity Margin	\$1.0616	\$0.9740	\$0.9740	\$1.0391	\$1.0391	(\$0.0225)	\$0.0651	0.00%	\$0.0000
Total Cost of Gas	\$4.8022	\$4.1997	\$3.9941	\$4.5178	\$4.7762	(\$0.0260)	\$0.7821	5.72%	\$0.2584
Avg Annual Cost	\$24,539.24	\$21,460.47	\$20,409.85	\$23,085.96	\$24,406.38	(\$132.86)	\$3,996.53	5.72%	\$1,320.42
Effect of proposed commodity change on average annual bills:									\$1,320.42
Effect of proposed demand change on average annual bills:									\$0.00
3) Large Vol. Interruptible: Avg. Annual Use: 16,150 Dth									
Commodity Cost	\$3.7406	\$3.2257	\$3.0201	\$3.4787	\$3.7371	(\$0.0035)	\$0.7170	7.43%	\$0.2584
Demand Cost									
Commodity Margin	\$0.5808	\$0.5329	\$0.5329	\$0.5685	\$0.5685	(\$0.0123)	\$0.0356	0.00%	\$0.0000
Total Cost of Gas	\$4.3214	\$3.7586	\$3.5530	\$4.0472	\$4.3056	(\$0.0158)	\$0.7526	6.38%	\$0.2584
Avg Annual Cost	\$69,790.61	\$60,701.39	\$57,380.95	\$65,362.28	\$69,535.44	(\$255.17)	\$12,154.49	6.38%	\$4,173.16
Effect of proposed commodity change on average annual bills:									\$4,173.16
Effect of proposed demand change on average annual bills:									\$0.00
4) Small Vol. Firm: Avg. Annual Use: 5,110 Dth									
Commodity Cost	\$3.7406	\$3.2257	\$3.0201	\$3.4787	\$3.7371	(\$0.0035)	\$0.7170	7.43%	\$0.2584
Demand Cost	\$28.0830	\$27.8640	\$27.9840	\$2.8101	\$34.4019	\$0.0000	\$6.4179	1124.22%	\$31.5918
Commodity Margin	\$1.0616	\$0.9740	\$0.9740	\$1.0391	\$1.0391	(\$0.0225)	\$0.0651	0.00%	\$0.0000
Demand Margin	\$3.2697	\$3.0000	\$3.0000	\$3.1449	\$3.1449	\$3.1449	\$0.1449	0.00%	\$0.0000
Total Cost of Gas	\$4.8022	\$4.1997	\$3.9941	\$4.5178	\$4.7762	(\$0.0260)	\$0.7821	5.72%	\$0.2584
Total Demand Cost	\$31.3527	\$30.8640	\$30.9840	\$5.9550	\$37.5468	\$6.1941	\$6.5628	530.51%	\$31.5918
Avg Annual Cost	\$25,323.06	\$22,232.07	\$21,184.45	\$23,234.83	\$25,345.05	\$21.99	\$4,160.60	9.08%	\$2,110.22
Effect of proposed commodity change on average annual bills:									\$1,320.42
Effect of proposed demand change on average annual bills:									\$789.79
5) Large Vol. Firm: Avg. Annual Use: 16,150 Dth									
Commodity Cost	\$3.7406	\$3.2257	\$3.0201	\$3.4787	\$3.7371	(\$0.0035)	\$0.7170	7.43%	\$0.2584
Demand Cost	\$28.0830	\$27.8640	\$27.9840	\$2.8101	\$34.4019	\$6.3189	\$6.4179	1124.22%	\$31.5918
Commodity Margin	\$0.5808	\$0.5329	\$0.5329	\$0.5685	\$0.5685	(\$0.0123)	\$0.0356	0.00%	\$0.0000
Demand Margin	\$3.2697	\$3.0000	\$3.0000	\$3.1449	\$3.1449	\$0.0000	\$0.1449	0.00%	\$0.0000
Total Cost of Gas	\$4.3214	\$3.7586	\$3.5530	\$4.0472	\$4.3056	(\$0.0158)	\$0.7526	6.38%	\$0.2584
Total Demand Cost	\$31.3527	\$30.8640	\$30.9840	\$5.9550	\$37.5468	\$37.5468	\$6.5628	530.51%	\$31.5918
Avg Annual Cost	\$72,142.06	\$63,016.19	\$59,704.75	\$65,808.91	\$72,351.45	\$2,560.84	\$12,646.70	9.94%	\$6,542.54
Effect of proposed commodity change on average annual bills:									\$4,173.16
Effect of proposed demand change on average annual bills:									\$2,369.38

Note: Average Annual Average based on NNG Annual Automatic Adjustment Report in Docket No. E, G999/AA-17-493
Note: Rates do not include the ACA adjustment.

In the Matter of the Petition of Minnesota
Energy Resources Corporation for
Approval of a Change in Demand
Entitlement for its Consolidated System

Docket No. G011/M-18-527

In the Matter Minnesota Energy Resources
Corporation's Petition for Approval of a
Change in Demand Entitlement for its
NNG System

Docket No. G011/M-18-526

CERTIFICATE OF SERVICE

I, Kristin M. Stastny, hereby certify that on the 10th day of January, 2019, on behalf of Minnesota Energy Resources Corporation (MERC) I electronically filed a true and correct copy of the enclosed Reply Comments 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 10th day of January, 2019.

/s/ Kristin M. Stastny
Kristin M. Stastny

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