



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

October 9, 2020

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

VIA ELECTRONIC FILING

**Re: In the Matter of the Petition of Minnesota Energy Resources Corporation
for a Variance and Notice of Refund Plan for Viking Gas Transmission
Pipeline Refund
Docket No. G011/M-20-702**

Dear Mr. Seuffert:

On September 1, 2020, Minnesota Energy Resources Corporation ("MERC" or the "Company") filed a Petition with the Minnesota Public Utilities Commission ("Commission") requesting approval of a variance from Minnesota Rule 7825.2700, subp. 8 and a notice of its refund plan to allow MERC to return a pipeline refund received from Viking Gas Transmission ("VGT") to customers in the MERC-Consolidated purchased gas adjustment ("PGA") area through the monthly PGA in the month of November 2020, or as soon as the Commission approves the variance request.

On October 1, 2020, the Minnesota Department of Commerce, Division of Energy Resources (the "Department") filed Comments addressing the Company's Petition. In its Comments, the Department recommends the following:

- Require MERC to accrue interest on the un-refunded amounts including the continued application of the appropriate prime rate interest rate until the balance of the VGT refund is fully refunded;
- Require MERC to report on the status of the refund in its 2021 True-up filing filed in September 2021;
- Approve a variance to Minnesota Rules part 7825.2700, subpart 8, to allow the Company to return the proposed refunds to customers via the Company CON-PGA in the earliest month possible rather than as customer bill credits.

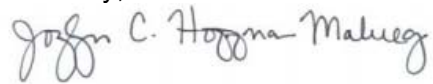
MERC thanks the Department for their review and submits these Reply Comments in response to the Department's recommendations. At this time, MERC is in agreement with the Department in their recommendations, and all issues between the Company and the Department are resolved.

Based upon the Department's recommendations, MERC requests that the Commission approve the Company's petition to allow implementation of the refund, as proposed, as soon as possible.

Mr. Will Seuffert
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Please contact me at (414) 221-4208 if you have any questions. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in dark ink, reading "Joylyn C. Hoffman Malueg". The signature is written in a cursive style with a large, stylized initial "J".

Joylyn Hoffman Malueg
Project Specialist 3
Minnesota Energy Resources Corporation

Enclosures
cc: Service List

In the Matter of the Request of Minnesota
Energy Resources Corporation for a Variance
and Notice of Refund Plan for Viking Gas
Transmission Pipeline Refund

Docket No. G011/M-20-702

CERTIFICATE OF SERVICE

I, Colleen T. Sipiorski, hereby certify that on the 9th day of October, 2020, 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 9th day of October, 2020.

/s/ Colleen T. Sipiorski
Colleen T. Sipiorski

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_20-702_M-20-702
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-702_M-20-702
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_20-702_M-20-702
Daryll	Fuentes	dfuentes@usg.com	USG Corporation	550 W Adams St Chicago, IL 60661	Electronic Service	No	OFF_SL_20-702_M-20-702
Joylyn C	Hoffman Malueg	Joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources	2685 145th St W Rosemount, MN 55068	Electronic Service	Yes	OFF_SL_20-702_M-20-702
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-702_M-20-702
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-702_M-20-702
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	Yes	OFF_SL_20-702_M-20-702
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_20-702_M-20-702
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-702_M-20-702

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-702_M-20-702
Colleen	Sipiorski	Colleen.Sipiorski@wecenergygroup.com	Minnesota Energy Resources Corporation	700 North Adams St Green Bay, WI 54307	Electronic Service	Yes	OFF_SL_20-702_M-20-702
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_20-702_M-20-702
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_20-702_M-20-702
Mary	Wolter	mary.wolter@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St Milwaukee, WI 53203	Electronic Service	Yes	OFF_SL_20-702_M-20-702
Tina E	Wuyts	tina.wuyts@wecenergygroup.com	Minnesota Energy Resources Corporation	PO Box 19001 700 N Adams St Green Bay, WI 54307-9001	Electronic Service	Yes	OFF_SL_20-702_M-20-702