## STATE OF MINNESOTA BEFORE THE PUBLIC UTILITIES COMMISSION

Katie Sieben Chair
Joseph K. Sullivan Vice-Chair
Valerie Means Commissioner
Matt Schuerger Commissioner
John Tuma Commissioner

In the Matter of a Petition of Minnesota Energy Resources Corporation for Approval of Farm Tap Customer-Owned Fuel Line Replacement Plan, Tariff Amendments, and Deferred Accounting DOCKET NO. G-011/M-17-409

COMMENTS OF THE OFFICE OF THE ATTORNEY GENERAL

#### **INTRODUCTION**

The Office of the Attorney General—Residential Utilities Division ("OAG") respectfully submits the following Comments in response to the Notice of Extended Comment Period issued on August 26, 2020 in the above-entitled matter. The purpose of these Comments is to demonstrate that the Commission should allow Minnesota Energy Resources Corporation ("MERC" or "Company") to require ratepayers to pay to replace farm taps for *all* affected customers, except for a modest fee in lieu of a contribution in aid of construction ("CIAC"). Requiring this fee from farm tap customers will ensure that MERC's ratepayers only pay to replace farm taps for customers that intend to use them.

#### I. BACKGROUND

On May 19, 2017, MERC filed a Farm Tap Customer Owned Fuel Line Replacement Plan ("2017 Petition") with the Commission. The 2017 Petition outlined the history of farm tap customers in MERC's service territory. Starting more than 85 years ago, Northern Natural Gas ("NNG") offered to allow customers access to the interstate pipeline in exchange for the

easements necessary to build the pipeline.<sup>1</sup> Landowners installed the fuel lines to access the taps installed by NNG, resulting in a variety of mapping techniques and materials used in these farm taps.<sup>2</sup> In 1987, NNG executed a thirty-year agreement with Peoples Natural Gas Company ("Peoples"), whereby Peoples provided limited services, including meter reading and odorization, to farm tap customers.<sup>3</sup> In 2006, after a series of mergers and acquisitions, MERC assumed Peoples' duties under the agreement with NNG.<sup>4</sup> While MERC was not a party to the original agreement, it has agreed to continue providing farm tap service on a month-to-month basis until a final decision is issued in this proceeding.<sup>5</sup> Farm tap customers have not received the same services as general service customers, but they have paid general service rates and thus contributed to rate base.<sup>6</sup>

MERC indicated that, due to safety concerns with the current arrangement, it would rather discontinue farm tap service than continue providing it under the status quo.<sup>7</sup> In the 2017 Petition, MERC proposed to resolve this issue by replacing all of the farm taps with companyowned main and service lines at an estimated cost of \$45 million.<sup>8</sup> Concerned about the impact on MERC's other ratepayers, the OAG filed comments recommending that the Commission consider alternative solutions before approving the project.<sup>9</sup>

On December 30, 2019, MERC filed its Report on Farm Tap Planning and Design Phase and Phase II Procedural Proposal ("Proposal"). In the Proposal, MERC explored several alternatives to replacing farm taps with Company-owned infrastructure, including alternatives

<sup>&</sup>lt;sup>1</sup> 2017 Petition at 5.

<sup>&</sup>lt;sup>2</sup> *Id.* at 5.

<sup>&</sup>lt;sup>3</sup> *Id*. at 5–8.

<sup>&</sup>lt;sup>4</sup> *Id*. at 6.

<sup>&</sup>lt;sup>5</sup> *Id*. at 9.

<sup>&</sup>lt;sup>6</sup> *Id*. at 21.

<sup>7</sup> *Id*. at 21.

<sup>8</sup> *Id.* at 22–27.

<sup>&</sup>lt;sup>9</sup> OAG Comments at 10–12 (Sept. 18, 2017).

suggested in the OAG Comments.<sup>10</sup> MERC concluded that replacing the farm taps was the most prudent course of action.<sup>11</sup> After the initial planning phase, MERC now believes that replacing all farm taps would cost \$46.6 million.<sup>12</sup> MERC now proposes only to replace farm taps for customers located within one mile of MERC's distribution system, which would reduce the project cost to \$7.1 million but only continue service to 14 percent of the farm tap customers.<sup>13</sup> Customers that are more than a mile from MERC's distribution system would need to make a prohibitively large CIAC to maintain their farm tap.<sup>14</sup>

#### II. ANALYSIS

To allow farm tap customers to keep receiving service, and to recognize their historical contributions to MERC's base rates, the Commission should allow MERC to recover from all ratepayers the cost of replacing all farm taps with Company-owned infrastructure for all farm tap customers. Farm tap customers should, however, pay a modest fee in lieu of a CIAC to ensure that MERC's ratepayers only pay for farm tap customers who actually intend to use the new infrastructure.

## A. THE COMMISSION SHOULD ALLOW MERC TO REPLACE THE FARM TAPS FOR ALL AFFECTED CUSTOMERS AND RECOVER COSTS FROM ALL CUSTOMERS.

Replacing farm taps with company-owned equipment for farm tap customers that want to continue receiving natural gas service, and having the whole system pay for the cost of doing so, is the most reasonable option. While the OAG understands that controlling rates for MERC's other customers was the underlying motivation for limiting its proposal to customers located within one mile of the Company's distribution system, excluding the remainder of the farm tap

<sup>&</sup>lt;sup>10</sup> Proposal at 8–12.

<sup>&</sup>lt;sup>11</sup> *Id.* at 12–16.

<sup>&</sup>lt;sup>12</sup> *Id*. at 6.

<sup>&</sup>lt;sup>13</sup> *Id.* at 13–14.

<sup>&</sup>lt;sup>14</sup> *Id.* at 14.

customers would not be an equitable outcome for those customers. As MERC has noted, despite not causing the same costs as general service customers, farm tap customers have historically paid general service rates. It would be unjust for the system now not to pay for the necessary upgrades to provide safe and reliable service to farm tap customers.

While the price tag is substantial, the unique situation presented here justifies incurring these costs. The Company estimates that replacing all farm taps would increase its revenue requirement by more than \$5 million per year. The impact to an average residential ratepayer for the total project would be \$16 per year, or \$1.33 per month. The OAG does not take this kind of rate impact to residential ratepayers lightly. That said, a rate increase of less than \$2 per month for residential customers is reasonable if it means that 1,550 customers who have contributed to base rates for several decades get to continue receiving natural gas service. Accordingly, the Commission should accept MERC's proposal to socialize the farm tap replacement costs, and expand it to include all farm tap customers.

# B. THE COMMISSION SHOULD REQUIRE A MODEST CONTRIBUTION FROM FARM TAP CUSTOMERS TO ENSURE THAT RATEPAYERS ONLY PAY FOR FARM TAP CUSTOMERS WHO WILL ACTUALLY USE NATURAL GAS SERVICE.

The Commission should require any farm tap customer wishing to continue receiving natural gas service to make a modest \$500 contribution to the replacement project. While this may seem inconsistent with the recommendation that the costs of the replacement project should be socialized, it would be an important protection for existing ratepayers because it would reduce unnecessary projects and lower overall costs.

<sup>16</sup> *Id*.

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<sup>&</sup>lt;sup>15</sup> See MERC Response to Department IR No. 45 (attached hereto as Exhibit A).

Depending on the methodology used to calculate the CIAC, the average contribution for a farm tap customer would be \$39,601.<sup>17</sup> By contributing \$500, these customers would be paying less than two percent of this cost. The purpose of this contribution, however, would not be to fund a meaningful portion of the project costs. Rather, requiring this contribution would protect other ratepayers by ensuring that they only pay replacement costs for farm tap customers who value their natural gas service and intend to continue using it.

During the planning and design phase of this project, MERC experienced significant disinterest on the part of some farm tap customers. 18 When trying to study the feasibility of this project, MERC had to send three rounds of letters and reduce its target sample size due to a lack of response, ultimately needing to contact 520 customers just to find 275 who were willing to participate. 19 If the low response rate reflects a lack of interest in receiving natural gas service, moving forward with the replacement project would risk spending millions of dollars on natural gas infrastructure for customers who do not value it. Asking farm tap customers to contribute less than two percent of the extension costs is a fair way to make sure that these upgrades only go to customers who are actually invested in receiving natural gas service.

Finally, while the purpose of the \$500-per-customer contribution is not to recoup a significant portion of the project costs, the contributions should be used to offset the ultimate revenue-requirement impact of the replacement project costs.

#### **CONCLUSION**

It is important that farm tap customers be able to continue receiving safe and reliable natural gas service. For this reason, and in recognition of these customers' historical

<sup>&</sup>lt;sup>17</sup> Proposal at 20.

<sup>&</sup>lt;sup>18</sup> *Id.* at 3.

<sup>&</sup>lt;sup>19</sup> *Id*. at 4–5.

contribution to base rates, the costs of their replacement projects should be socialized, save for a modest \$500 contribution in lieu of a CIAC.

Dated: September 14, 2020 Respectfully submitted,

KEITH ELLISON Attorney General State of Minnesota

#### /s/ Peter G. Scholtz

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ATTORNEYS FOR OFFICE OF THE ATTORNEY GENERAL—RESIDENTIAL UTILITIES DIVISION



#### Minnesota Department of Commerce 85 7th Place East | Suite 280 | St. Paul, MN 55101 Information Request

Docket Number: G011/M-17-409□ Nonpublic⊠ PublicRequested From: Minnesota Energy Resources CorpDate of Request: 4/27/2020Type of Inquiry: GeneralResponse Due: 5/7/2020

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Michael Zajicek, Dorothy Morrissey

Email Address(es): michael.zajicek@state.mn.us; dorothy.morrissey@state.mn.us

Phone Number(s): 651.539.1830; 651.539.1797

#### **ADDITIONAL INSTRUCTIONS:**

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 45

Topic: Billing Impacts
Reference(s): Petition Pages 17-18

#### Request:

Please provide a spreadsheet showing the percent increase for an average customer's bills, both monthly and yearly, for all customer classes and for both the replacement of all farm tap lines and MERC's proposal.

Response: Please see attached spreadsheet. These estimates do not include gas costs.

			Prop	osed	А	nnual		onthly
		Ra	te/Therm	\$/Customer	Avg Bill	% Increase	Avg Bill	% Increase
Residential		\$	0.00360	\$ 3	\$ 720	0.4%	\$ 60	0.4%
Class 1-2 Firm (Sales and Transport)		\$	0.00216	\$ 10	\$ 3,081	0.3%	\$ 257	0.3%
Class 1-2 Interruptible (Sales and Transpo	rt), Class 1-2 Ag Grain Dryer, and Class 1 Power Gen	\$	0.00216	\$ 92	\$ 18,676	0.5%	\$ 1,556	0.5%
Class 3-4 Firm (Sales and Transport)		\$	0.00036	\$ 60	\$ 96,406	0.1%	\$ 8,034	0.1%
Class 3-4 Interruptible (Sales and Transpo	rt) and Class 3-4 Ag Grain Dryer	\$	0.00036	\$ 203	\$ 91,761	0.2%	\$ 7,647	0.2%
Class 5, FLEX, Transport for Resale, and C	Class 2 Power Gen	\$	0.00036	\$ 1,566	\$ 76,551	2.0%	\$ 6,379	2.0%
Direct Connect		\$	-	\$ -				
			Total Rep	lacement	А	nnual	M	onthly
		Ra	te/Therm	\$/Customer	Avg Bill	% Increase	Avg Bill	% Increase
Residential		\$	0.01821	\$ 16	\$ 720	2.2%	\$ 60	2.2%
Class 1-2 Firm (Sales and Transport)		\$	0.01094	\$ 49	\$ 3,081	1.6%	\$ 257	1.6%
Class 1-2 Interruptible (Sales and Transpo	rt), Class 1-2 Ag Grain Dryer, and Class 1 Power Gen	\$	0.01094	\$ 465	\$ 18,676	2.5%	\$ 1,556	2.5%
Class 3-4 Firm (Sales and Transport)		\$	0.00184	\$ 305	\$ 96,406	0.3%	\$ 8,034	0.3%
Class 3-4 Interruptible (Sales and Transpo	rt) and Class 3-4 Ag Grain Dryer	\$	0.00184	\$ 1,036	\$ 91,761	1.1%	\$ 7,647	1.1%
Class 5, FLEX, Transport for Resale, and C	class 2 Power Gen	\$	0.00184	\$ 8,003	\$ 76,551	10.5%	\$ 6,379	10.5%
Direct Connect		\$	-	\$ -				

To be completed by responder

Response Date: May 7, 2020

Response by: Mary Wolter, Director Gas Regulatory Planning & Policy

Email Address: mary.wolter@wecenergygroup.com

Phone Number: (414) 221-2374

#### Support for DOC-45

#### 2020 Revenue Requirement for GUIC Rider - Farm Tap Phase II, Year 6

#### Description

#### Residential

Class 1-2 Firm (Sales and Transport)

Class 1-2 Interruptible (Sales and Transport), Class 1-2 Ag Grain Dryer, and Class 1 Power Gen

Class 3-4 Firm (Sales and Transport)

Class 3-4 Interruptible (Sales and Transport) and Class 3-4 Ag Grain Dryer

Class 5, FLEX, Transport for Resale, and Class 2 Power Gen

**Direct Connect** 

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Class 1-2 Firm (Sales and Transport)

Class 1-2 Interruptible (Sales and Transport), Class 1-2 Ag Grain Dryer, and Class 1 Power Gen

Class 3-4 Firm (Sales and Transport)

Class 3-4 Interruptible (Sales and Transport) and Class 3-4 Ag Grain Dryer

Class 5, FLEX, Transport for Resale, and Class 2 Power Gen

**Direct Connect** 

	Prop	osec	ı		Aı	nnual		М	onthly
Ra	te/Therm	\$/	Customer (	-	Avg Bill	% Increase	Α	vg Bill	% Increase
\$	0.00360	\$	3	\$	720	0.4%	\$	60	0.4%
\$	0.00216	\$	10	\$	3,081	0.3%	\$	257	0.3%
\$	0.00216	\$	92	\$	18,676	0.5%	\$	1,556	0.5%
\$	0.00036	\$	60	\$	96,406	0.1%	\$	8,034	0.1%
\$	0.00036	\$	203	\$	91,761	0.2%	\$	7,647	0.2%
\$	0.00036	\$	1,566	\$	76,551	2.0%	\$	6,379	2.0%
\$	-	\$	-						

		Total Rep	lace	ment		Aı	nnual		М	onthly
	Rate	e/Therm	\$/	'Customer	1	Avg Bill	% Increase	Α	vg Bill	% Increase
ſ	\$	0.01821	\$	16	\$	720	2.2%	\$	60	2.2%
	\$	0.01094	\$	49	\$	3,081	1.6%	\$	257	1.6%
	\$	0.01094	\$	465	\$	18,676	2.5%	\$	1,556	2.5%
	\$	0.00184	\$	305	\$	96,406	0.3%	\$	8,034	0.3%
	\$	0.00184	\$	1,036	\$	91,761	1.1%	\$	7,647	1.1%
	\$	0.00184	\$	8,003	\$	76,551	10.5%	\$	6,379	10.5%
	\$	-	\$	-						

												MN Jurisdi	ction Only				
Line	Description	Reference	2018	Rate Case	For	ecasted Year		Increment	eal Co	sete	D	ata Casa An	portionment		Full Repla	ocomo	int
1	Depreciation Expense	See Note 1	ć	nate case	ć	1.000.000	\$	1,000,000	tai Ct	7313		1,000,000	portioninent	Ś	1,000,000	aceine	ant.
2	Property Tax, Other Incremental O&M Expens		Ś		č	1,000,000	Ś	1,000,000			Ś	1,000,000		Ś	1,000,000		
-	Property Tax, Other Incremental Odivi Expens	ne.	,	-	,	-	,	-			,	-		,	-		
3	Rate Base	13-Month Average Net Plant Value	\$	-	\$	43,700,000	\$	43,700,000			\$ .	43,700,000		\$	43,700,000		
4	ADIT Proration Adjustment		\$		\$	-	\$	-				-	_		-		
5	Adjusted Rate Base	13-Month Average Net Plant Value	\$	-	\$	43,700,000	\$	43,700,000				43,700,000			43,700,000		
6	Rate of Return	Commission Authorized 2018 Rate Case						6.6971%				6.6971%			6.6971%		
7	Earnings on Rate Base	Line 5 x Line 6					\$	2,926,633			\$	2,926,633		\$	2,926,633		
8	Gross Revenue Conversion Factor	2018 Rate Case Adjusted for Tax Reform						1.402				1.402	_		1.402		
9	Return on Rate Base	Line 7 x Line 8					\$	4,103,139			\$	4,103,139	_	\$	4,103,139		
10													_				
11	Total Revenue Requirement	Line 1 + Line 2 + Line 9					\$	5,103,139			\$	5,103,139	_	\$	5,103,139		
12																	
13	Offsetting Project Revenue	See Note 2					\$	46,499			\$	46,499		\$	46,499		
14													_				
15	2020 Annual Revenue Deficiency	Line 11 less line 13					\$	5,056,640				5,056,640			5,056,640		
16													=				
17	Total Therms - MN Jurisdictional	See Note 3						771,153,868			7.	71,153,868			771,153,868		
18																	
19	Average Per Therm Increase	Line 17 / Line 19					\$	0.00656			\$	0.00656		\$	0.00656		
							F	Rate/Therm	\$/	Customer	Ra	te/Therm	\$/Customer	F	tate/Therm	\$/C	ustomer
20	Residential						\$	0.00656	\$	6	\$	0.01692	\$ 15	\$	0.01821	\$	16
21	Class 1-2 Firm (Sales and Transport)						\$	0.00656	\$	29	\$	0.01163	\$ 52	\$	0.01094	\$	49
22	Class 1-2 Interruptible (Sales and Transport)	, Class 1-2 Ag Grain Dryer, and Class 1 Power	Gen				\$	0.00656	\$	59	\$	0.00147	\$ 63	\$	0.01094	\$	465
23	Class 3-4 Firm (Sales and Transport)						\$	0.00656	\$	5,114	\$	0.01163	\$ 1,928	\$	0.00184	\$	305
24	Class 3-4 Interruptible (Sales and Transport)	and Class 3-4 Ag Grain Dryer					\$	0.00656	\$	3,691	\$	0.00147	\$ 827	\$	0.00184	\$	1,036
25	Class 5, FLEX, Transport for Resale, and Cla	ss 2 Power Gen					\$	0.00656	\$	28,521	\$	0.00147	\$ 6,394	\$	0.00184	\$	8,003
26	Direct Connect						\$	0.00656	\$	214,867	\$	0.00147	\$ 48,169	\$		\$	100
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- 1 Assumes a depreciation rate of 0.025
- 2 This represents incremental customers and sales growth of 100 customers @ Farm Tap Residential Rate of \$9.50/month plus 1615 therms/year @ \$0.21733.
  - Potentially an additional 240 customers could be added, but that assumes 100% participation regardless of cost an unlikely outcome.
- The costs to serve the projected additional 100 customers, net of excess footage charges and customer contributions, are not included in the project revenue requirement.

  3 Projected 2020 sales per MERC's 2018 filed rate case data in Docket No. G011/GR-17-563

Minnesota Energy Resources Corporation Docket No. G011/M-19-\_\_\_ Exhibit B 2020 NGEP Revenue Deficiency Calculation

### Estimated Project Costs: \$ 46,557,719

						0.025		
	Can	ital Inv	Δνσ	Capital	Do	preciation	Na	t Capital
Year 0	Сар	0	Av8	0	De	0	IVC	c capital 0
Year 1	\$	9,311,544	\$	4,655,772	\$	116,394	\$	9,195,150
Year 2	\$	9,311,544	\$	13,850,921	\$	346,273	\$	18,160,420
Year 3	\$	9,311,544	\$	22,816,192	\$	570,405	\$	26,901,559
Year 4	\$	9,311,544	\$	31,557,331	\$	788,933	\$	35,424,170
Year 5	Ś	9,311,544	\$	40,079,942	\$	1,001,999	\$	43,733,715
Year 6	-	0	\$	43,733,715	\$	1,093,343	\$	42,640,372
Year 7		0	\$	42,640,372	\$	1,066,009	Ś	41,574,363
Year 8		0	\$	41,574,363	\$	1,039,359	\$	40,535,004
Year 9		0	\$	40,535,004	\$	1,013,375	\$	39,521,629
Year 10		0	\$	39,521,629	\$	988,041	\$	38,533,588
Year 11		0	\$	38,533,588	\$	963,340	\$	37,570,248
Year 12		0	\$	37,570,248	\$	939,256	\$	36,630,992
Year 13		0	\$	36,630,992	\$	915,775	\$	35,715,217
Year 14		0	\$	35,715,217	\$	892,880	\$	34,822,337
Year 15		0	\$	34,822,337	\$	870,558	\$	33,951,778
Year 16		0	\$	33,951,778	\$	848,794	\$	33,102,984
Year 17		0	\$	33,102,984	\$	827,575	\$	32,275,409
Year 18		0	\$	32,275,409	\$	806,885	\$	31,468,524
Year 19		0	\$	31,468,524	\$	786,713	\$	30,681,811
Year 20		0	\$	30,681,811	Ś	767,045	Ś	29,914,766
Year 21		0	\$	29,914,766	\$	747,869	\$	29,166,897
						,		., ,
		_						
Year 22		0	\$	29,166,897	\$	729,172	\$	28,437,724
Year 23		0	\$	28,437,724	\$	710,943	\$	27,726,781
Year 24		0	\$	27,726,781	\$	693,170	\$	27,033,612
Year 25		0	\$	27,033,612	\$	675,840	\$	26,357,771
Year 26		0	\$	26,357,771	\$	658,944	\$	25,698,827
Year 27		0	\$	25,698,827	\$	642,471	\$	25,056,356
Year 28		0	\$	25,056,356	\$	626,409	\$	24,429,947
Year 29		0	\$	24,429,947	\$	610,749	\$	23,819,199
Year 30		0		23,819,199	\$	595,480	\$	23,223,719
Year 31			\$	23,223,719	\$	580,593	\$	22,643,126
Year 32 Year 33		0	\$	22,643,126	\$	566,078	\$	22,077,048
Year 34		0	\$	22,077,048	\$	551,926	\$	21,525,121
Year 35		0	\$	21,525,121	\$	538,128	\$	20,986,993
Year 36		0	\$	20,986,993	\$	524,675 511,558	\$	20,462,319 19,950,761
Year 37		0	\$	19,950,761	\$	498,769	\$	19,451,992
Year 38		0	\$	19,451,992	\$	486,300	\$	18,965,692
		0	\$		\$		\$	
Year 39 Year 40		0	\$	18,965,692 18,491,550	\$	474,142 462,289	\$	18,491,550 18,029,261
Year 41		0	\$	18,029,261	\$	450,732	\$	17,578,529
Year 41 Year 42		0	\$	18,029,261	\$	450,732	\$	17,578,529
Year 43		0	\$	17,139,066	\$	439,463	\$	16,710,589
Year 44		0	ŝ	16,710,589	ŝ	428,477	ŝ	16,292,825
Year 45		0	\$	16,292,825	\$	407,321	\$	15,885,504
.ca 43		U	Ļ	10,232,023	ب	407,321	پ	

Revenue Requirement: \$ 5,056,640

				Ra	te Case Appo	rtio	nment 1	
	Therm Sales	Customer Count	Revenue Apportionment	Аp	Initial portionment	Ra	ate/Therm	\$ /Customer
Residential	186,792,651	212,647	62.5%	\$	3,160,400	\$	0.01692	\$ 14.86
Firm Sales	102,149,802	22,042	23.5%	\$	1,188,310	\$	0.01163	\$ 53.91
Interruptible Sales	36,992,703	467 _	3.5%	\$	176,982	\$	0.00478	\$ 378.98
Transport	124,600,988	153	_	\$	148,593	\$	0.00119	\$ 971.20
Class 5, FLEX, Trans for Resale	58,473,904	21	10.5%	\$	69,733	\$	0.00119	\$ 3,320.63
Direct Connect	262,143,820	8 _		\$	312,621	\$	0.00119	\$ 39,077.57
Michigan Mines	n/a	n/a			n/a		n/a	
	771,153,868	235,338		\$	5,056,640			

				Rat	te Case Appo	ortion	ment 2						Option	1							Optio	n 2			
			Revenue		Initial		_			_				_				_				_			
	Therm Sales		Apportionment	App	ortionment		e/Therm	. \$/	Customer	Re	distribute	App		Rai	e/Therm	\$/0	Customer	Re	distribute	App	ortionment	ка	te/Therm	\$/	Customer
Residential	186,792,651	212,647	62.5%	\$	3,160,400		0.01692	\$	14.86			\$	3,400,932	\$	0.01821	\$	16.00			\$	3,400,932	\$	0.01821	\$	16.00
Class 1-2 Firm (Sales and Transport)	98,170,103	22,018	23.5%	\$	1,142,015	\$	0.01163	\$	51.85			\$	1,228,931	\$	0.01252	\$	55.82			\$	1,073,976	\$	0.01094	\$	48.78
Class 3-4 Firm (Sales and Transport) Class 1-2 Interruptible (Sales and	3,979,699	24 _	23.370	\$	46,296	\$	0.01163	\$	1,928.50			\$	49,819	\$	0.01252	\$	2,076.08			\$	7,306	\$	0.00184	\$	305.11
Transport), Class 1-2 Ag Grain Dryer,																									
and Class 1 Power Gen Class 3-4 Interruptible (Sales and	18,718,087	440	_	\$	27,480	\$	0.00147	\$	62.54			\$	32,063	\$	0.00171	\$	72.75			\$	204,775	\$	0.01094	\$	465.40
Transport) and Class 3-4 Ag Grain			14.0%																						
Dryer	101,308,314	180		\$	148,730	\$	0.00147	\$	827.35			\$	173,533	\$	0.00171	\$	962.43			\$	185,989	\$	0.00184	\$	1,035.60
Class 5, FLEX, Transport for Resale,																									
and Class 2 Power Gen	100,041,194	23		\$	146,869	\$	0.00147	\$	6,393.94			\$	171,363	\$	0.00171	\$	7,437.85			\$	183,663	\$	0.00184	\$	8,003.30
Direct Connect	262,143,820	8 _		\$	384,851	\$	0.00147	\$	48,168.93	\$	(384,851)	\$	-	\$	-	\$	-	\$	(384,851)	\$	-	\$	-	\$	-
Michigan Mines	n/a	n/a			n/a		n/a				n/a		n/a		n/a				n/a		n/a		n/a		
- -	771,153,868	235,340		\$	5,056,640	-				\$	(384,851)	\$	5,056,640					\$	(384,851)	\$	5,056,640	-			

#### **Proposed**

Customer Class	posed Rider surcharge	Average nual Cost	Total \$	% of 2020 revenue requirement
Residential	\$ 0.01821	\$ 16	\$ 3,400,932	67.3%
Class 1-2 Firm (Sales and Transport)	\$ 0.01094	\$ 49	\$ 1,073,976	21.2%
Class 1-2 Interruptible (Sales and Transport), Class 1-2 Ag Grain Dryer, and Class 1 Power Gen	\$ 0.01094	\$ 465	\$ 204,775	4.0%
Class 3-4 Firm (Sales and Transport)	\$ 0.00184	\$ 305	\$ 7,306	0.1%
Class 3-4 Interruptible (Sales and Transport) and Class 3-4 Ag Grain Dryer	\$ 0.00184	\$ 1,036	\$ 185,989	3.7%
Class 5, FLEX, Transport for Resale, and Class 2 Power Gen	\$ 0.00184	\$ 8,003	\$ 183,663	3.6%
Direct Connect	\$ -	\$ -	\$ -	0.0%
Total			\$ 5,056,640	100%

#### NOTES

#### REVENUE APPORTIONMENT (EXCLUDING COST OF GAS) - Docket G011/GR-17-563

	Revenue Apportionment
Residential	62.50%
Firm Sales	23.50%
nterruptible Sales	3.50%
Fransport	10.50%
	100.00%

#### SALES BY CLASS

	2018 Forecast*	2020 Forecast	2018 Customer <u>Count</u>	2020 Customer <u>Count</u>
Residential	183,783,848	186,792,651	210,331	212,647
Firm Sales				
Class 1	9,082,832	9,369,628	9,093	9,345
Class 2	88,430,255	88,800,475	13,003	12,672.33
Class 3	3,963,107	3,979,699	24	24
Class 4	-	-		
Class 5	-			
	101,476,194	102,149,802	22,120	22,042
Interruptible & Joint Sales				
Class 1	400,646	400,875	42	42
Class 2	15,846,069	15,855,124	366	359 **
Class 3	17,218,410	17,228,250	63	63
Class 4	3,506,450	3,508,454	3	3
Class 5	-	-		
•	36,971,575	36,992,703	474	467
Firm Transport	-	-	-	-
Interruptible & Joint Transport				
Class 1	-	-	-	-
Class 2	2,382,624	2,462,087	39	39
Class 3	56,768,957	58,662,264	103	100 **
Class 4	21,202,228	21,909,346	14	14
Class 5	37,430,900	38,679,262	14	14
Power Generation	40,225,718	41,567,290	2	2
FLEX & Trans for Resale	19,155,776	19,794,642	7	7
Direct Connect**	253,683,205	262,143,820	8	8
Total Transport	430,849,408	445,218,712	187	184
Sales Forecast	753,081,025	771,153,868	233,112	235,340

Minnesota Energy Resources Corporation Docket No. G011/M-19-\_\_\_ Exhibit B 2020 NGEP Revenue Deficiency Calculation

Revenue (excluding gas) (\$)   Revenue (excluding gas) (\$)   Requirement (excluding gas) (\$)
(\$) (\$) (excluding gas (%))  Residential 68,043,217 70,038,600 62.5  Firm Sales 26,187,473 26,254,563 23.5  Interruptible Sales 3,843,986 3,860,043 3.5
Residential 68,043,217 70,038,600 62.5 Firm Sales 26,187,473 26,254,563 23.5 Interruptible Sales 3,843,986 3,860,043 3.5
Residential         68,043,217         70,038,600         62.5           Firm Sales         26,187,473         26,254,563         23.5           Interruptible Sales         3,843,986         3,860,043         3.5
Firm Sales 26,187,473 26,254,563 23.5 Interruptible Sales 3,843,986 3,860,043 3.5
Interruptible Sales 3,843,986 3,860,043 3.5
Sales 3,843,986 3,860,043 3.5
Transport 9,111,319 11,774,733 10.5
Total 107,185,995 111,927,939 100%

Docket G011/GR17-563 Final Order dated 12-26-2018

<sup>\*</sup> Docket G011/GR-17-563 per "Attachment A\_Commission\_Rate\_Design.xlsx"

\*\*Based on 2018 Actual Sales per OAG-40 in the 2019 GUIC Rider Docket No. G011/M-19-281

\*\*\*Adjusted by a total of 10 in order to match forecasted total customer count for 2020 of 235,340 customers.

											MN Jurisdi	tion Only			
					Fore	ecasted Year									
Line	Description	Reference	2018	Rate Case		6		Increment	al Costs			portionment		Propo	sed
1	Depreciation Expense	See Note 1	\$	-	\$	200,000	\$	200,000		\$	200,000		\$	200,000	
2	Property Tax, Other Incremental O&M Expe	ense	\$	-	\$	-	\$	-		\$	-		\$	-	
3	Rate Base	13-Month Average Net Plant Value	\$	_	\$	9,000,000	\$	9,000,000		\$	9,000,000		\$	9,000,000	
4	ADIT Proration Adjustment		\$	-	\$	-	\$	-			-			-	
5	Adjusted Rate Base	13-Month Average Net Plant Value	\$	-	\$	9,000,000	\$	9,000,000			9,000,000			9,000,000	
6	Rate of Return	Commission Authorized 2018 Rate Case						6.6971%			6.6971%			6.6971%	
7	Earnings on Rate Base	Line 5 x Line 6					\$	602,739		\$	602,739		\$	602,739	
8	Gross Revenue Conversion Factor	2018 Rate Case Adjusted for Tax Reform						1.402			1.402			1.402	
9	Return on Rate Base	Line 7 x Line 8					\$	845,040		\$	845,040		\$	845,040	
10															
11	Total Revenue Requirement	Line 1 + Line 2 + Line 9					\$	1,045,040		\$	1,045,040		\$	1,045,040	
12															
13	Offsetting Project Revenue	See Note 2					\$	46,499		\$	46,499		\$	46,499	
14															
15	2020 Annual Revenue Deficiency	Line 11 less line 13					\$	998,541			998,541			998,541	
16															
17	Total Therms - MN Jurisdictional	See Note 3					_ 7	771,153,868		_ 7	71,153,868		_ 7	71,153,868	
18															
19	Average Per Therm Increase	Line 17 / Line 19					\$	0.00129		\$	0.00129		\$	0.00129	
							Ra	ate/Therm	\$/Customer	R	ate/Therm	\$/Customer	Ra	te/Therm	\$/Customer
20	Residential						\$	0.00129	\$ 1	. \$	0.00334	\$ 3	\$	0.00360	\$ 3
21	Class 1-2 Firm (Sales and Transport)						\$	0.00129	\$ 6	\$	0.00230	\$ 10	\$	0.00216	\$ 10
22	Class 1-2 Interruptible (Sales and Transpo	ort), Class 1-2 Ag Grain Dryer, and Class 1 Powe	r Gen				\$	0.00129	\$ 12	\$	0.00029	\$ 12	\$	0.00216	\$ 92
23	Class 3-4 Firm (Sales and Transport)						\$	0.00129	\$ 1,010	\$	0.00230	\$ 381	\$	0.00036	\$ 60
24	Class 3-4 Interruptible (Sales and Transpo	ort) and Class 3-4 Ag Grain Dryer					\$	0.00129	\$ 729	\$	0.00029	\$ 163	\$	0.00036	\$ 203
25	Class 5, FLEX, Transport for Resale, and	Class 2 Power Gen					\$	0.00129	\$ 5,632	\$	0.00029	\$ 1,261	\$	0.00036	\$ 1,566
26	Direct Connect						\$	0.00129	\$ 42,430	\$	0.00029	\$ 9,503	\$	-	\$ -

#### Notes

- 1 Assumes a depreciation rate of 0.025
- 2 This represents incremental customers and sales growth of 100 customers @ Farm Tap Residential Rate of \$9.50/month plus 1615 therms/year @ \$0.21733.

  Potentially an additional 240 customers could be added, but that assumes 100% participation regardless of cost an unlikely outcome.
- The costs to serve the projected additional 100 customers, net of excess footage charges and customer contributions, are not included in the project revenue requirement.
- 3 Projected 2020 sales per MERC's 2018 filed rate case data in Docket No. G011/GR-17-563

#### stimated Project Costs: \$ 9,622,045

						0.035		
					_	0.025		
V 0	Cap	ital Inv 0		g Capital	υe	preciation	Net	t Capital
Year 0				0		0		0
Year 1	\$	1,924,409	\$	962,205	\$	24,055	\$	1,900,354
Year 2	\$	1,924,409	\$	2,862,558	\$	71,564	\$	3,753,199
Year 3	\$	1,924,409	\$		\$	117,885	\$	5,559,723
Year 4	\$	1,924,409	\$	6,521,927	\$	163,048	\$	7,321,084
Year 5	\$	1,924,409		8,283,288	\$	207,082	\$	9,038,410
Year 6		0	\$		\$	225,960	\$	8,812,450
Year 7		0	\$		\$	220,311	\$	8,592,139
Year 8		0	\$		\$	214,803	\$	8,377,335
Year 9		0	\$	8,377,335	\$	209,433	\$	8,167,902
Year 10		0	\$	8,167,902	\$	204,198	\$	7,963,705
Year 11		0	\$	7,963,705	\$	199,093	\$	7,764,612
Year 12		0	\$		\$	194,115	\$	7,570,497
Year 13		0	\$	7,570,497	\$	189,262	\$	7,381,234
Year 14		0	\$	7,381,234	\$	184,531	\$	7,196,703
Year 15		0	\$	7,196,703	\$	179,918	\$	7,016,786
Year 16		0	\$	7,016,786	\$	175,420	\$	6,841,366
Year 17		0	\$	6,841,366	\$	171,034	\$	6,670,332
Year 18		0	\$	6,670,332	\$	166,758	\$	6,503,574
Year 19		0	\$		\$	162,589	\$	6,340,984
Year 20		0	\$		\$	158,525	\$	6,182,460
Year 21		0	\$	6,182,460	\$	154,561	\$	6,027,898
V 22			,	6 027 000	_	450.007	,	E 077 204
Year 22		0	\$	6,027,898	\$	150,697	\$	5,877,201
Year 23		0	\$		\$	146,930	\$	5,730,271
Year 24		0	\$		\$	143,257	\$	5,587,014
Year 25		0	\$		\$	139,675	\$	5,447,339
Year 26		0	\$		\$	136,183	\$	5,311,155
Year 27		0	\$	5,311,155	\$	132,779	\$	5,178,376
Year 28		0	\$		\$	129,459	\$	5,048,917
Year 29		0	\$		\$	126,223	\$	4,922,694
Year 30		0	\$		\$	123,067	\$	4,799,627
Year 31		0	\$		\$	119,991	\$	4,679,636
Year 32		0			\$	116,991	\$	4,562,645
Year 33		0	\$		\$	114,066	\$	4,448,579
Year 34		0	\$		\$	111,214	\$	4,337,364
Year 35		0	\$		\$	108,434	\$	4,228,930
Year 36		0	\$		\$	105,723	\$	4,123,207
Year 37		0	\$		\$	103,080	\$	4,020,127
Year 38		0	\$		\$	100,503	\$	3,919,624
Year 39		0	\$		\$	97,991	\$	3,821,633
Year 40		0	\$		\$	95,541	\$	3,726,092
Year 41		0	\$		\$	93,152	\$	3,632,940
Year 42		0	\$		\$	90,823	\$	3,542,116
Year 43		0	\$		\$	88,553	\$	3,453,564
Year 44		0	\$		\$	86,339	\$	3,367,224
Year 45		0	\$	3,367,224	\$	84,181	\$	3,283,044

Revenue Requirement: \$ 998,541

				Ra	te Case Appo	ortio	nment 1		
	Therm Sales	Customer Count	Revenue Apportionment	App	Initial portionment	Ra	ate/Therm	\$/	Customer
Residential	186,792,651	212,647	62.5%	\$	624,088	\$	0.00334	\$	2.93
Firm Sales	102,149,802	22,042	23.5%	\$	234,657	\$	0.00230	\$	10.65
Interruptible Sales	36,992,703	467	3.5%	\$	34,949	\$	0.00094	\$	74.84
Transport	124,600,988	153	_	\$	29,343	\$	0.00024	\$	191.78
Class 5, FLEX, Trans for Resale	58,473,904	21	10.5%	\$	13,770	\$	0.00024	\$	655.73
Direct Connect	262,143,820	8 –		\$	61,734	\$	0.00024	\$	7,716.70
Michigan Mines	n/a	n/a			n/a		n/a		
	771,153,868	235,338		\$	998,541	-			

				Rate Case A			Rate Case Apportionment 2				Option 1								Option 2						
			Revenue		Initial																				
	Therm Sales		Apportionment	Appo	ortionment	Rat	e/Therm	Customer	Re	distribute	App	ortionment	Ra	te/Therm	\$/0	Customer	Re	distribute	Appo	rtionment		te/Therm	\$	/Customer	
Residential	186,792,651	212,647	62.5%	\$	624,088	\$	0.00334	\$ 2.93			\$	671,586	\$	0.00360	\$	3.16			\$	671,586	\$	0.00360	\$	3.16	
Class 1-2 Firm (Sales and Transport)	98,170,103	22,018	23.5%	\$	225,515	\$	0.00230	\$ 10.25			\$	242,679	\$	0.00247	\$	11.01			\$	212,079	\$	0.00216	\$	9.63	
Class 3-4 Firm (Sales and Transport)	3,979,699	24	23.370	\$	9,142	\$	0.00230	\$ 381.39			\$	9,838	\$	0.00247	\$	409.58			\$	1,443	\$	0.00036	\$	59.70	
Class 1-2 Interruptible (Sales and																									
Transport), Class 1-2 Ag Grain Dryer,																									
and Class 1 Power Gen	18,718,087	440		\$	5,426	\$	0.00029	\$ 12.34			\$	6,331	\$	0.00034	\$	14.46			\$	40,437	\$	0.00216	\$	91.89	
Class 3-4 Interruptible (Sales and		}	_																						
Transport) and Class 3-4 Ag Grain			14.0%																						
Dryer	101,308,314	180		\$	29,370	\$	0.00029	\$ 163.22			\$	34,268	\$	0.00034	\$	191.36			\$	36,728	\$	0.00036	\$	202.62	
Class 5, FLEX, Transport for Resale,																									
and Class 2 Power Gen	100,041,194	23		\$	29,003	\$	0.00029	\$ 1,261.39			\$	33,839	\$	0.00034	\$	1,478.87			\$	36,268	\$	0.00036	\$	1,565.86	
Direct Connect	262,143,820	8		\$	75,997	\$	0.00029	\$ 9,502.71	\$	(75,997)	\$	-	\$	-	\$	-	\$	(75,997)	\$	-	\$	-	\$	-	
Michigan Mines	n/a	n/a			n/a		n/a			n/a		n/a		n/a				n/a		n/a		n/a			
- -	771,153,868	235,340		\$	998,541				\$	(75,997)	\$	998,541					\$	(75,997)	\$	998,541	_				

#### Proposed:

Customer Class	posed Rider surcharge	Average inual Cost	Total \$	% of 2020 revenue requirement
Residential	\$ 0.00360	\$ 3	\$ 671,586	67.3%
Class 1-2 Firm (Sales and Transport)	\$ 0.00216	\$ 10	\$ 212,079	21.2%
Class 1-2 Interruptible (Sales and Transport), Class 1-2 Ag Grain Dryer, and Class 1 Power Gen	\$ 0.00216	\$ 92	\$ 40,437	4.0%
Class 3-4 Firm (Sales and Transport)	\$ 0.00036	\$ 60	\$ 1,443	0.1%
Class 3-4 Interruptible (Sales and Transport) and Class 3-4 Ag Grain Dryer	\$ 0.00036	\$ 203	\$ 36,728	3.7%
Class 5, FLEX, Transport for Resale, and Class 2 Power Gen	\$ 0.00036	\$ 1,566	\$ 36,268	3.6%
Direct Connect	\$ -	\$ -	\$ -	0.0%
Total			\$ 998,541	100%

#### NOTES

#### REVENUE APPORTIONMENT (EXCLUDING COST OF GAS) - Docket G011/GR-17-563

	Revenue Apportionment
Residential	62.50%
Firm Sales	23.50%
nterruptible Sales	3.50%
Fransport	10.50%
	100.00%

#### SALES BY CLASS

	2018 Forecast*	2020 Forecast	2018 Customer <u>Count</u>	2020 Customer <u>Count</u>
Residential	183,783,848	186,792,651	210,331	212,647
Firm Sales				
Class 1	9,082,832	9,369,628	9,093	9,345
Class 2	88,430,255	88,800,475	13,003	12,672.33
Class 3	3,963,107	3,979,699	24	24
Class 4	-	-		
Class 5	-			
	101,476,194	102,149,802	22,120	22,042
Interruptible & Joint Sales				
Class 1	400,646	400,875	42	42
Class 2	15,846,069	15,855,124	366	359 **
Class 3	17,218,410	17,228,250	63	63
Class 4	3,506,450	3,508,454	3	3
Class 5	-	-		
•	36,971,575	36,992,703	474	467
Firm Transport	-	-	-	-
Interruptible & Joint Transport				
Class 1	-	-	-	-
Class 2	2,382,624	2,462,087	39	39
Class 3	56,768,957	58,662,264	103	100 **
Class 4	21,202,228	21,909,346	14	14
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Total Transport	430,849,408	445,218,712	187	184
Sales Forecast	753,081,025	771,153,868	233,112	235,340

Minnesota Energy Resources Corporation Docket No. G011/M-19-\_\_\_ Exhibit B 2020 NGEP Revenue Deficiency Calculation

Revenue (excluding gas) (\$)   Revenue (excluding gas) (\$)   Requirement (excluding gas) (\$)
(\$) (\$) (excluding gas (%))  Residential 68,043,217 70,038,600 62.5  Firm Sales 26,187,473 26,254,563 23.5  Interruptible Sales 3,843,986 3,860,043 3.5
Residential 68,043,217 70,038,600 62.5 Firm Sales 26,187,473 26,254,563 23.5 Interruptible Sales 3,843,986 3,860,043 3.5
Residential         68,043,217         70,038,600         62.5           Firm Sales         26,187,473         26,254,563         23.5           Interruptible Sales         3,843,986         3,860,043         3.5
Firm Sales 26,187,473 26,254,563 23.5 Interruptible Sales 3,843,986 3,860,043 3.5
Interruptible Sales 3,843,986 3,860,043 3.5
Sales 3,843,986 3,860,043 3.5
Transport 9,111,319 11,774,733 10.5
Total 107,185,995 111,927,939 100%

Docket G011/GR17-563 Final Order dated 12-26-2018

<sup>\*</sup> Docket G011/GR-17-563 per "Attachment A\_Commission\_Rate\_Design.xlsx"

\*\*Based on 2018 Actual Sales per OAG-40 in the 2019 GUIC Rider Docket No. G011/M-19-281

\*\*\*Adjusted by a total of 10 in order to match forecasted total customer count for 2020 of 235,340 customers.

#### MERC

#### SUMG MERC Fcst201703

Unito Thorms

Calendar Sales	Jan 2020	Feb 2020	March 2020	April 2020	May 2020	Jun 2020	July 2020	Aug 2020	Sept 2020	Oct 2020	Nov 2020	Dec 2020	Total	
NNG-MERC														
Residential Cal	28,498,787	24,458,138	19,385,542	11,295,418	5,841,088	2,168,814	1,394,468	1,574,207	3,958,279	10,426,843	17,199,027	25,616,492	151,817,103	
SC&I Cal	1,443,711	1,273,809	903,996	455,981	224,967	69.298	36,470	44,089	145,239	419.891	707.341	1,171,320	6.896.112	
LC&I Cal	12.268.515	10,608,346	8,522,391	5,199,002	2,960,313	1,453,805	1,136,207	1,209,441	2,184,390	4,829,450	7,593,737	11,028,723	68,994,320	
Joint Cal	23,595	23,621	20.096	14.935	11,710	7,407	4,214	4,320	5,738	9,585	10,299	15,294	150,814	
Interruptible Cal	3,849,418	3,391,593	2.816.348	1.899.856	1.282.492	867.042	779.458	799,653	1,068,516	1,797,944	2,560,253	3,507,520	24,620,093	
Transport Cal	46,992,360	45,576,140	43,778,034	40,889,669	38,944,232	37.637.289	37,369,394	37,439,639	38,289,103	40,589,403	42,989,795	45,975,897	496.470.955	
Company Use Cal	14,257	14,519	12,803	9,732	5,676	3,361	2,258	2,179	2,527	4,313	7,186	11,155	89,966	
Total NNG-MERC	93,090,643	85,346,166	75,439,210	59,764,593	49,270,478	42,207,016	40,722,469	41,073,528	45,653,792	58,077,429	71,067,638	87,326,401	749,039,363	749,039,363
Consolidated-MERC														
Residential Cal	4.998.204	4,288,381	3,456,355	2.087.827	1,105,997	336,472	77,814	157,865	719.335	1,905,921	3,051,496	4,502,020	26,687,687	
SC&I Cal	460.026	392.123	312.482	181.473	87.465	13.779	-11.000	-3.350	50.394	163,984	273.643	412.471	2.333.490	
LC&I Cal	3.613.298	3.238.629	2.608.577	1.678.001	1.021.808	539.842	427.664	413.985	531,918	1.131.502	1.884.995	2.983.853	20.074.072	
Joint Cal	38.499	33.970	28.674	20.023	13.808	8.949	7.311	7.808	11.328	18.766	25.936	35.006	250.078	
Interruptible Cal	1,326,829	1,184,907	1.018.878	746.586	551.437	398.689	347.389	363.226	474,288	708,772	934,825	1,220,731	9,276,557	
Transport Cal	6.955.452	6.828.245	6.632.784	6.209.525	5,365,016	5.023.344	5,017,687	5,012,164	5.006.268	5.386.485	5,379,957	5.868.522	68.685.449	
	23.150	23.241	21.253	17.143	13.458	10.178	8.156	7,766	8,584	11.457	15.262	20.071		
Company Use Cal								5,959,464					179,719	107 107 050
Total Consolidated-MERC	17,415,458	15,989,496	14,079,003	10,940,578	8,158,989	6,331,253	5,875,021	5,959,464	6,802,115	9,326,887	11,566,114	15,042,674	127,487,052	127,487,052
ABL-MERC														
Residential Cal	1,599,117	1,367,160	1,076,115	613,689	302,146	92,643	48,835	59,124	194,651	562,035	946,402	1,425,944	8,287,861	
SC&I Cal	25,150	21,719	17,404	10,522	5,884	2,761	2,103	2,256	4,280	9,773	15,517	22,657	140,026	
LC&I Cal	355,139	343,469	328,807	305,445	289,709	279,119	276,887	277,401	284,255	302,848	322,279	346,424	3,711,782	
Joint Cal														
Interruptible Cal	369,535	332,624	286,246	212,357	162,584	129,089	122,028	123,656	145,332	204,141	265,599	341,970	2,695,161	
Transport Cal	195,945	190,992	184,769	174,855	168,176	163,681	162,734	162,952	165,861	173,752	181,999	192,246	2,117,962	
Company Use Cal													0	
Total ABL-MERC	2,544,886	2,255,964	1,893,341	1,316,868	928,499	667,293	612,587	625,389	794,379	1,252,549	1,731,796	2,329,241	16,952,792	16,952,792
Total-MERC														
Residential Cal	35,096,108	30,113,679	23,918,012	13.996.934	7,249,231	2,597,929	1,521,117	1,791,196	4,872,265	12,894,799	21,196,925	31,544,456	186,792,651	
SC&I Cal	1,928,887	1,687,651	1,233,882	647,976	318,316	85,838	27,573	42,995	199,913	593,648	996,501	1,606,448	9,369,628	
LC&I Cal	16.236.952	14,190,444	11.459.775	7.182.448	4.271.830	2.272.766	1.840.758	1.900.827	3.000.563	6.263.800	9.801.011	14,359,000	92.780.174	
Joint Cal	62.094	57.591	48.770	34.958	25.518	16.356	11.525	12.128	17.066	28.351	36.235	50.300	400.892	
Interruptible Cal	5.545.782	4.909.124	4.121.472	2.858.799	1.996.513	1.394.820	1,248,875	1.286.535	1,688,136	28,351	30,235	5.070.221	36.591.811	
Transport Cal	54,143,757 37.407	52,595,377 37,760	50,595,587	47,274,049	44,477,424 19.134	42,824,314 13.539	42,549,815	42,614,755	43,461,232	46,149,640	48,551,751 22,448	52,036,665 31,226	567,274,366	
Company Use Cal Total-MERC Calendar Sales	113.050.987	103.591.626	34,056 91,411,554	26,875 72.022.039	58.357.966	49.205.562	10,414 47.210.077	9,945	11,111 53.250.286	15,770 68.656.865	84.365.548	104.698.316	269,685 893,479,207	893.479.207
				, , , , , , , , , , , , , , , , , , , ,		., .,,,,,	, .,,	7		,				
Total MERC Losses (2.00%)	2,261,020	2,071,833	1,828,231	1,440,441	1,167,159	984,111	944,202	953,168	1,065,006	1,373,137	1,687,311	2,093,966	17,869,584	17,869,585
Total MERC Inc. Compuse, Transp and losses	115,312,007	105,663,459	93,239,785	73,462,480	59,525,125	50,189,673	48,154,279	48,611,549	54,315,292	70,030,002	86,052,859	106,792,282	911,348,791	911,348,792
Test to verify Billed + Unbilled = Calendar Sales	113.050.987	103.591.626	91.411.554	72.022.039	58.357.966	49.205.562	47.210.077	47.658.381	53.250.286	68.656.865	84.365.548	104.698.316	893.479.207	893.479.207
reat to verify billed + Oribilled - Calendar Sales	113,050,987	103,591,626	91,411,554	72,022,039	0 0	49,205,562	47,210,077	47,658,381	53,250,286	08,000,800	84,365,548	104,698,316	093,479,207	035,473,207
													s: Company Use	-269,685
												Less	s: MI Jurisdiction	-122,055,654
														771,153,868

Customer Count	January	February	March	April	Ma	y Jun	e Ju	ıly A	ugust	September	October	November	December	
MERC CONSOL GS RES	30	),822 31	),845	30,869	30,893	30,916	30,939	30,963	30,986	31,008	31,031	31,053	31,076	30,950
MERC CONSOL GS SCI	2	2,290	,292	2,294	2,296	2,298	2,300	2,301	2,303	2,305	2,306	2,308	2,309	2,300
MERC CONSOL GS LCI	3	3,185	,185	3,185	3,185	3,184	3,184	3,184	3,184	3,184	3,183	3,183	3,183	3,184
MERC CONSOL INTERRUPTIBLE		60	60	59	59	59	58	58	58	58	57	57	57	58
MERC CONSOL JOINT		4	4	4	4	4	4	4	4	4	۱ 4	. 4	4	4
MERC CONSOL TRANSPORT		52	52	52	52	52	52	52	52	51	. 51	. 51	. 51	52
MERC NNG GS RES	171	1,817 17:	,830	171,894	171,986	172,054	172,149	172,212	172,321	172,455	172,518	172,654	172,738	172,219
MERC NNG GS SCI	6	5,976	,982	6,989	6,995	7,001	7,007	7,013	7,019	7,024	7,030	7,035	7,040	7,009
NNG GS LCI	8	3,734	3,729	8,724	8,719	8,715	8,710	8,707	8,703	8,700	8,697	8,694	8,691	8,710
MERC NNG INTERRUPTIBLE		360	360	359	359	359	359	359	359	359	358	358	358	359
MERC NNG JOINT		3	3	3	3	3	3	3	3	3	3	3	3	3
MERC NNG TRANSPORT		134	134	134	134	134	134	134	134	134	134	134	134	134
ABL Residential _Customer	g	9,474	,475	9,475	9,476	9,477	9,477	9,478	9,479	9,480	9,480	9,481	9,482	9,478
ABL SC&I_Customer		36	36	36	36	36	36	36	36	36	36	36	36	36
ABL LC&I_Customer		802	802	802	802	802	802	802	802	802	! 802	802	802	802
ABL Interruptible _Customer		37	37	37	37	37	35	35	35	35	37	36	36	36
Transport_Customer		5	5	5	5	5	5	5	5	5	5 5	. 5	5	5

235,340

#### 2018 MERC Gas Rate Design

Current MERC Customer Class	Proposed MERC Customer Class	Bill Counts	Annual Usage (Therms)	Daily Firm Capacity (Therms)		PGAC Revenues (\$)	Revenues Proposed Ra (\$)		Gas Cost (\$/Therm)	Customer Count	Annual Usage (Therms)	Monthly Usage (Therms)	Monthly DFC (Therms)
GS-NNG Residential Sales GS-NNG Residential Farm-Tap Sales	NNG SALES GS-NNG Residential Sales GS-NNG Residential Farm-Tap Sales	2,028,328 16,774	147,236,758 2,257,698		s s	67,781,914 1,039,354			\$0.46036 \$0.46036	169,027 1,398	871 1,615	73 135	0
GS-NNG SC&I Sales	C&I FIRM Class 1	80,349	6,397,577		\$	2,945,189	\$ 5,814	,995 \$0.46036	\$0.46036	6,696	955	80	0
GS-NNG SC&I Sales GS-NNG SC&I Sales	Agriculture Grain Dryer - Class 1 GS-NNG C&I Farm-Tap Class 1	12 1,439	159 275,134		S S	73 126,661		634 \$0.46036 ,783 \$0.46036	\$0.46036 \$0.46036	1 120	159 2,294	13 191	0
GS-INING SCAL Sales	GS-NNG Carrann-Tap Class T	1,439	275,134		3	120,001	φ 213	,763 \$0.40030	\$0.40036	120	2,294	191	
GS-NNG LC&I Sales GS-NNG LC&I Sales	C&I FIRM Class 2 C&I FIRM Class 3	105,654 208	62,766,433 2.882.958		\$ \$	28,895,155 1,327,199			\$0.46036 \$0.46036	8,805 17	7,129 166.325	594 13.860	0
GS-NNG LC&I Sales	Power Generating Unit - Class 1	24	2,396		\$	1,103	\$ 2	,421 \$0.46036	\$0.46036	2	1,198	100	0
GS-NNG LC&I Sales GS-NNG LC&I Sales	Agriculture Grain Dryer - Class 1 GS-NNG C&I Farm-Tap Class 2	24 2,423	7,552 3,043,620		S	3,477 1,401,161		,535 \$0.46036 ,259 \$0.46036	\$0.46036 \$0.46036	2 202	3,776 15,074	315 1,256	0
									,				
SVI-NNG Sales SVI-NNG Sales	C&I INT Class 2 C&I INT Class 3	2,856 387	9,250,562 5,055,493		\$ \$	3,392,459 1,854,001	\$ 4,487 \$ 2,395		\$0.36673 \$0.36673	238 32	38,868 156,759	3,239 13,063	0
SVI-NNG Sales	Agriculture Grain Dryer - Class 1	156	136,341		\$	50,000	\$ 74	,681 \$0.36673	\$0.36673	13	10,488	874	0
SVI-NNG Sales	Agriculture Grain Dryer - Class 2	252	782,362		\$	286,916	\$ 362	,018 \$0.36673	\$0.36673	21	37,255	3,105	0
LVI-NNG Sales	C&I INT Class 2	129	512,638		\$	188,000			\$0.36673	11	47,687	3,974	
LVI-NNG Sales LVI-NNG Sales	C&I INT Class 3 Power Generating Unit - Class 1	239 60	7,533,481 163,361		S S	2,762,753 59,909		,328 \$0.36673 ,869 \$0.36673	\$0.36673 \$0.36673	20 5	378,250 32,672	31,521 2,723	0
LVI-NNG Sales	Agriculture Grain Dryer - Class 1	84	38,638		\$	14,170		,954 \$0.36673	\$0.36673	7	5,520	460	0
LVI-NNG Sales	Agriculture Grain Dryer - Class 2	192	1,128,883		\$	413,995	\$ 514	,639 \$0.36673	\$0.36673	16	70,555	5,880	0
SVJ-NNG Sales	C&I JOINT Class 2	36	150,483	11,400	\$	55,187	\$ 94	,438 \$0.36673	\$0.36673	3	50,161	4,180	317
GS-CONSOLIDATED Residential Sales	CONSOLIDATED SALES GS-CONSOLIDATED Residential Sales	365,171	26,112,678		\$	9,471,852	\$ 19,387	,152 \$0.36273	\$0.36273	30,431	858	72	0
GS-CONSOLIDATED SC&I Sales	C&I FIRM Class 1	26,860	2,271,799		\$	824,050			\$0.36273	2,238	1,015	85	0
GS-CONSOLIDATED SC&I Sales	Agriculture Grain Dryer - Class 1	36	6,678		\$	2,422	\$ 4	,907 \$0.36273	\$0.36273	3	2,226	186	0
GS-CONSOLIDATED LC&I Sales	C&I FIRM Class 2	38,408	19,466,788		\$	7,061,188			\$0.36273	3,201	6,082	507	0
GS-CONSOLIDATED LC&I Sales GS-CONSOLIDATED LC&I Sales	C&I FIRM Class 3 Agriculture Grain Dryer - Class 1	54 24	523,378 5,613		\$ \$	189,845 2,036		,931 \$0.36273 ,843 \$0.36273	\$0.36273 \$0.36273	5 2	116,306 2,807	9,692 234	0
SVI-CONSOLIDATED Sales	C&I INT Class 2	604	2,895,430		s	832,320	\$ 1,162	,160 \$0.28746	\$0.28746	50	57,525	4,794	0
SVI-CONSOLIDATED Gales	C&I INT Class 3	86	1,620,081		\$	465,708		,045 \$0.28746	\$0.28746	7	226,058	18,838	ő
SVI-CONSOLIDATED Sales SVI-CONSOLIDATED Sales	Agriculture Grain Dryer - Class 1 Agriculture Grain Dryer - Class 2	12 12	7,987 20,706		S	2,296 5,952		,870 \$0.28746 ,180 \$0.28746	\$0.28746 \$0.28746	1	7,987 20,706	666 1,726	0
LVI-CONSOLIDATED Sales	C&I INT Class 2 C&I INT Class 3	20 20	30,753 1,171,613		S S	8,840 336,792		,955 \$0.28746 ,844 \$0.28746	\$0.28746 \$0.28746	2	18,452 702,968	1,538 58.581	0
LVI-CONSOLIDATED Sales	C&I INT Class 4	39	3,506,450		\$	1,007,964			\$0.28746	3	1,078,908	89,909	0
SVJ-CONSOLIDATED Sales	C&I JOINT Class 2	48	253,802	13,200	s	72,958	\$ 127	,008 \$0.28746	\$0.28746	4	63,451	5,288	275
GS-ALBERT LEA NNG Residential Sales	ALBERT LEA-NNG SALES GS-ALBERT LEA NNG Residential Sales	113,698	8,176,714		\$	3,764,232	\$ 6,862	,867 \$0.46036	\$0.46036	9,475	863	72	0
GS-ALBERT LEA NNG SC&I Sales	C&I FIRM Class 1	463	138,322		s	63,678	\$ 102	,790 \$0.46036	\$0.46036	39	3,585	299	0
GS-ALBERT LEA NNG LC&I Sales	C&I FIRM Class 2	9,539	3,153,414		\$	1,451,706			\$0.46036	795	3,967	331	0
GS-ALBERT LEA NNG LC&I Sales	C&I FIRM Class 3	22	556,771		\$	256,315	\$ 329	,280 \$0.46036	\$0.46036	2	303,693	25,308	0
SVI-ALBERT LEA NNG Sales	C&I INT Class 2	146	474,383		\$	173,970		,128 \$0.36673	\$0.36673	12	38,990	3,249	0
SVI-ALBERT LEA NNG Sales SVI-ALBERT LEA NNG Sales	C&I INT Class 3 Agriculture Grain Dryer - Class 1	16 68	813,756 31,921		S S	298,429 11.706		,993 \$0.36673 .901 \$0.36673	\$0.36673 \$0.36673	1	610,317 5.633	50,860 469	0
SVI-ALBERT LEA NNG Sales	Agriculture Grain Dryer - Class 1	12	34,502		\$	,		,005 \$0.36673	\$0.36673	1	34,502	2,875	0
LVI-ALBERT LEA NNG Sales	C&I INT Class 2	82	311,565		\$	114,260	\$ 150	,518 \$0.36673	\$0.36673	7	45,595	3,800	0
LVI-ALBERT LEA NNG Sales	C&I INT Class 3	10	1,023,986		\$	375,526		,974 \$0.36673	\$0.36673	1	1,228,783	102,399	0
	NNG TRANSPORT												
SVI-NNG Transport SVI-NNG Transport	C&I INT Class 3 C&I INT Class 4	157 47	1,539,532 1,276,029					,987 ,288		13 4	117,671 325.795	9,806 27,150	0
•										·			
LVI-NNG Transport - CIP Applicable LVI-NNG Transport - CIP Applicable	C&I INT Class 3 C&I INT Class 4	338 59	20,563,868 10,621,799				\$ 2,050 \$ 532			28 5	730,078 2,160,366	60,840 180,031	0
LVI-NNG Transport - CIP Applicable	Agriculture Grain Dryer - Class 3	12	1,604,084				\$ 97	,779		1	1,604,084	133,674	0
SVJ-NNG Transport	C&I JOINT Class 2	182	752,266	70,774				,095		15	49,600	4,133	389
SVJ-NNG Transport SVJ-NNG Transport	C&I JOINT Class 3 Agriculture Grain Dryer - Class 2	155 12	2,266,216 58,040	213,206 5,460				,936 ,560		13 1	175,449 58,040	14,621 4,837	1,376 455
LVJ-NNG Transport - CIP Applicable	C&I JOINT Class 2	23	19.546	797				,059		2	10.198	850	35
LVJ-NNG Transport - CIP Applicable	C&I JOINT Class 3	232	10,440,253	425,680			\$ 1,443	,109		19	540,013	45,001	1,835
LVJ-NNG Transport - CIP Applicable	C&I JOINT Class 4	23 0	2,954,976	120,483			\$ 157	,199		2	1,541,727	128,477	5,238

LVJ-NNG Transport - CIP Exempt	C&I JOINT Class 5 - CIP Exempt	24	24,813,170	552,000	\$	137,479	2	12,406,585	1,033,882	23,000
SLVI-NNG Transport-CIP Exempt	C&I INT Class 5 - CIP Exempt	169	223,134,374		\$	1,085,832	14	15,843,861	1,320,322	0
SLVI-NNG Transport-CIP Applicable	C&I INT Class 4	24	2,103,500		\$	109,492	2	1,051,750	87,646	0
SLVJ-NNG Transport-CIP Exempt	Power Generating Unit - Class 2 CIP Exempt	24	40,225,718	4,298,400	\$	302,060	2	20,112,859	1,676,072	179,100
Transport for Resale LVJ-NNG Flex Transport (Cust "A") LVJ-NNG Flex Transport (Cust "B") LVJ-NNG Flex Transport (Cust "C") LVJ-NNG Flex Transport (Cust "C") LVJ-NNG Flex Transport (Cust "E") LVJ-NNG Flex Transport (Cust "F") LVJ-NNG Flex Transport (Cust "F") LVJ-NNG Flex Transport (Cust "G")	Transport for Resale LVJ-NNG Flex Transport (Cust "A") LVI-NNG Flex Transport (Cust "B") LVI-NNG Flex Transport (Cust "C") LVI-NNG Flex Transport (Cust "D") LVJ-NNG Flex Transport (Cust "E") LVJ-NNG Flex Transport (Cust "F") LVJ-NNG Flex Transport (Cust "F") LVJ-NNG Flex Transport (Cust "G")	12 12 12 36 12	206,679 5,824,816 7,473,350 4,563,375 1,087,556	72,000 144,000 90,000	\$ \$ \$ \$ \$ \$ \$ \$	19,757 209,360 - - 120,289 184,223 47,350	1 1 0 0 0 0 1 3	206,679 5,824,816 0 0 7,473,350 1,521,125 1,087,556	17,223 485,401 0 0 0 622,779 126,760 90,630	0 10,250 0 0 0 6,000 4,000 7,500
SVI-CONSOLIDATED Transport	CONSOLIDATED TRANSPORT C&I INT Class 2	59	283,437		\$	41,133	5	57,648	4,804	0
SVI-CONSOLIDATED Transport	C&I INT Class 3	73	830,679		\$	101,519	6	136,550	11,379	0
LVI-CONSOLIDATED Transport LVI-CONSOLIDATED Transport	C&I INT Class 3 C&I INT Class 4	68 13	3,580,918 4,245,924		\$ \$	359,924 209,136	6 1	631,927 3,919,314	52,661 326,610	0
SVJ-CONSOLIDATED Transport SVJ-CONSOLIDATED Transport	C&I JOINT Class 2 C&I JOINT Class 3	197 18	1,269,335 423,959	119,820 40,020	\$ \$	401,297 81,765	16 2	77,320 282,639	6,443 23,553	608 2,223
LVJ-CONSOLIDATED Transport	C&I JOINT Class 3	131	13,402,164	410,040	\$	1,677,208	11	1,227,679	102,307	3,130
SLVJ-CONSOLIDATED Transport-CIP Exempt	C&I INT Class 5 - CIP Exempt	72	43,166,561	1,436,400	\$	266,734	6	7,194,427	599,536	19,950
SVI-ALBERT LEA Transport	ALBERT LEA-NNG TRANSPORT C&I INT Class 3	24	356,506		\$	41,261	2	178,253	14,854	0
LVI-ALBERT LEA Transport	C&I INT Class 3	24	1,760,778		\$	174,006	2	880,389	73,366	0
	Residential Residential Farm Tap Class 1 Class 1 Farm Tap Class 1 Ag Class 2 Farm Tap Class 2 Farm Tap Class 2 Parm Tap Class 2 Ag Class 2 - Int Class 3 - Inter Class 3 - Interr Class 4 - Interr Class 4 - Interr Class 4 - Interr Class 5 - Interr Power Generating 1 Power Generating 2 FLEX & Transport for Resale	2,507,197 16,774 107,672 1,439 416 153,601 2,423 480 4,382 2,84 12 1,978 205 265 84 24 84 2,797,320	181,526,150 2,257,698 8,807,698 8,807,698 275,134 234,889 85,386,635 3,043,620 2,024,493 16,204,200 3,963,107 1,604,084 72,383,283 24,708,678 291,114,105 165,757 40,225,718 19,155,776	0 0 0 0 0 0 0 0 5,460 215,991 0 0 1,088,946 120,483 1,988,400 4,298,400 429,000	\$ 81,017,998 \$ 1,039,354 \$ \$ 3,832,916 \$ \$ 1,6661 \$ \$ 16,661 \$ \$ 74,465 \$ 1,461,161 \$ \$ 719,516 \$ \$ 4,837,994 \$ \$ 1,773,359 \$ \$ 1,007,964 \$ \$ 1,007,964 \$ \$ \$ 1,007,964 \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	149,647,915 1,756,042 7,730,813 213,783 135,326 58,713,719 2,023,259 918,402 7,213,121 2,313,744 97,779 14,425,023 2,269,465 1,490,045 81,290 302,060 580,978	208,933 1,398 8,973 1200 202 40 365 24 11 165 17 22 7 2 7			
	i Otai	2,131,320	100,001,025	0,140,000	φ 135,405,314 \$	243,312,165	233,112			

**Opt Out** 338,813,173

September 14, 2020

Mr. Will Seuffert Executive Secretary Minnesota Public Utilities Commission 121 7<sup>th</sup> Place East, Suite 350 St. Paul, MN 55101

Re: In the Matter of a Petition of Minnesota Energy Resources Corporation for Approval of Farm Tap Customer-Owned Fuel Line Replacement Plan, Tariff Amendments, and Deferred Accounting MPUC Docket No. G-011/M-17-409

Dear Mr. Seuffert:

Enclosed and e-filed in the above-referenced matter please find Comments of the Minnesota Office of the Attorney General—Residential Utilities Division.

By copy of this letter all parties have been served. A Certificate of Service is also enclosed.

Sincerely,

/s/ Peter G. Scholtz

PETER G. SCHOLTZ Assistant Attorney General

(651) 757-1473 (Voice) (651) 296-9663 (Fax) peter.scholtz@ag.state.mn.us

Enclosure

**CERTIFICATE OF SERVICE** 

Re: In the Matter of a Petition of Minnesota Energy Resources Corporation for

Approval of Farm Tap Customer-Owned Fuel Line Replacement Plan, Tariff

Amendments, and Deferred Accounting MPUC Docket No. G-011/M-17-409

I, JUDY SIGAL, hereby certify that on the 14th day of September, 2020, I e-filed with

eDockets Comments of the Minnesota Office of the Attorney General—Residential Utilities

Division and served a true and correct copy of the same upon all parties listed on the attached

service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and

deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

/s/ Judy Sigal

JUDY SIGAL

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Ahern	ahern.michael@dorsey.co	Dorsey & Whitney, LLP	50 S 6th St Ste 1500	Electronic Service	No	OFF_SL_17-409_M-17-409
		E		Minneapolis, MN 554021498			
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400	Electronic Service	Yes	OFF_SL_17-409_M-17-409
				St. Paul, MN 55101			
Sharon	Ferguson	sharon.ferguson@state.mn	Department of Commerce	85 7th Place E Ste 280	Electronic Service	No	OFF_SL_17-409_M-17-409
				Saint Paul, MN 551012198			
Daryll	Fuentes	dfuentes@usg.com	USG Corporation	550 W Adams St	Electronic Service	No	OFF_SL_17-409_M-17-409
				Chicago, IL 60661			
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600	Electronic Service	No	OFF_SL_17-409_M-17-409
				Minneapolis, MN 55402			
Andrew	Moratzka	andrew.moratzka@stoel.co	Stoel Rives LLP	33 South Sixth St Ste 4200	Electronic Service	No	OFF_SL_17-409_M-17-409
				Minneapolis, MN 55402			
Catherine	Phillips	Catherine.Phillips@wecene Minnesota Energy	Minnesota Energy Resources	231 West Michigan St	Electronic Service	No	OFF_SL_17-409_M-17-409
				Milwaukee, WI 53203			
J. Gregory	Porter	greg.porter@nngco.com	Northern Natural Gas Company	1111 South 103rd St	Electronic Service	No.	OFF_SL_17-409_M-17-409
				Omaha, NE 68124			
Generic Notice	Residential Utilities Division residential.utilities@ag.stat		Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_17-409_M-17-409
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				Saint Paul, MN 55101			

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Colleen	Sipiorski	Colleen.Sipiorski@wecener gygroup.com	Minnesota Energy Resources Corporation	700 North Adams St Green Bay, WI 54307	Electronic Service	No	OFF_SL_17-409_M-17-409
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Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_17-409_M-17-409
Магу	Wolter	mary.wolter@wecenergygr oup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_17-409_M-17-409