

Direct Testimony and Schedules
Jared J. Peccarelli

Before the Minnesota Public Utilities Commission
State of Minnesota

In the Matter of the Application of Minnesota Energy Resources Corporation for
Authority to Increase Rates for Natural Gas Service in Minnesota

Docket No. G011/GR-22-504

Exhibit _____ (JJP-D)

**Sales Forecast, Fixed Charge Forecast, and
Weather Normalization of Sales**

November 1, 2022

TABLE OF CONTENTS

	Page
I. INTRODUCTION AND QUALIFICATIONS.....	1
II. PURPOSE OF TESTIMONY AND COMPLIANCE REQUIREMENTS	4
III. CONSULTATION WITH THE DEPARTMENT.....	8
IV. PROPOSED SALES FORECAST	17
V. DEVELOPMENT OF WEATHER DATA.....	26
VI. WEATHER NORMALIZATION MODELS AND METHODOLOGY	29
VII. CUSTOMER CHARGE COUNTS.....	30
VIII. FIRM/INTERRUPTIBLE FIRM SALES FORECAST.....	30
IX. FORECAST RESULTS AND CONCLUSIONS.....	31

1 **I. INTRODUCTION AND QUALIFICATIONS**

2 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

3 A. My name is Jared J. Peccarelli. My business address is 231 W. Michigan Street,
4 Milwaukee, WI 53203.

5
6 Q. BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR POSITION?

7 A. I am employed by WEC Business Services LLC, a wholly-owned subsidiary of
8 WEC Energy Group, Inc. (“WEC”), in the role of Manager – Sales Forecasting in
9 the Finance department supporting Minnesota Energy Resources Corporation
10 (“MERC”) and other regulated wholly-owned utility subsidiaries of WEC.

11
12 Q. FOR WHOM ARE YOU PROVIDING TESTIMONY?

13 A. I am providing testimony on behalf of MERC.

14
15 Q. PLEASE DESCRIBE YOUR EDUCATIONAL, PROFESSIONAL, AND UTILITY
16 BACKGROUND.

17 A. I received both a Bachelor of Science degree in Computer Science and a Master
18 of Business Administration degree with a finance concentration from the
19 University of Wisconsin – Milwaukee. In addition, I have completed all
20 coursework required for a Master of Science degree in Applied Economics from
21 Marquette University in Milwaukee, Wisconsin. I was hired by Wisconsin Electric
22 (a subsidiary of WEC) in November 2002 and worked in various roles in several
23 departments prior to my current position. I joined the Sales Forecasting team in

1 Finance as a Principal Analyst in 2014 and have developed or assisted in the
2 development of long-term electric and natural gas sales forecasts for all of the
3 WEC utility subsidiaries since then. I am currently responsible for overseeing the
4 development of the long-term sales forecasts for all of the electric, natural gas,
5 and steam utility subsidiaries of WEC, including MERC.
6

7 Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE ANY REGULATORY
8 AGENCY?

9 A. Yes. I submitted testimony concerning sales forecasting in general rate
10 proceedings on behalf of Wisconsin Electric, Wisconsin Gas, and Wisconsin
11 Public Service Corporation before the Public Service Commission of Wisconsin
12 in dockets 05-UR-110, 05-UR-109, 6690-UR-127, and 6690-UR-126. I have also
13 submitted natural gas sales forecasting testimony on behalf of Michigan Gas
14 Utilities Corporation in general rate case proceedings and gas cost recovery
15 filings before the Michigan Public Service Commission and on behalf of North
16 Shore Gas Company in general rate case proceedings before the Illinois
17 Commerce Commission. Additionally, I submitted testimony pertaining to the
18 electric sales and peak demand forecast methodology on behalf of Upper
19 Michigan Energy Resources Corporation with respect to its Integrated Resource
20 Planning filing before the Michigan Public Service Commission in Case No. U-
21 21081.
22

1 Q: ARE YOU SPONSORING ANY EXHIBITS IN CONNECTION WITH YOUR
2 TESTIMONY IN THIS PROCEEDING?

3 A. Yes, I am sponsoring Exhibit ____ (JJP-D), Schedules 1 through 4 which consists
4 of the following:

- 5 • Schedule 1 provides the 2021 Historic Year, the 2022 Projected Year,
6 and the 2023 Proposed Test Year, including weather normalization,
7 growth, and monthly schedules for sales;
- 8 • Schedule 2 shows the 2021 Historic Year, the 2022 Projected Year, and
9 the 2023 Proposed Test Year annual fixed charge counts, monthly
10 average fixed charge counts, and year-end fixed charge counts;
- 11 • Schedule 3 shows the 2021 Historic Year, the 2022 Projected Year, and
12 the 2023 Proposed Test Year Firm Sales for Firm/Interruptible¹
13 Customers; and
- 14 • Schedule 4 links the sales data between the revenue deficiency
15 calculation, Class Cost of Service Study (“CCOSS”), and the rate design
16 model.

17
18 Exhibit ____ (JJP-D), Schedules 1 through 3 include the forecast and historical
19 data for each customer class by MERC’s two Purchased Gas Adjustment
20 (“PGA”) areas: MERC-NNG and MERC-Consolidated.

¹ Customers taking service on the Firm/Interruptible rate schedules have the ability to nominate a portion of their load as firm with the remainder of their load served as interruptible. Schedule 3 shows the firm sales forecasted for the customers on the Firm/Interruptible rate schedules. The Firm/Interruptible rate schedules for system sales customers are referred to as “Joint” on Schedule 3.

1
2 Q. WERE THESE EXHIBITS PREPARED BY YOU OR UNDER YOUR DIRECTION
3 AND SUPERVISION?

4 A. Yes, they were.

5

6 **II. PURPOSE OF TESTIMONY AND COMPLIANCE REQUIREMENTS**

7 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

8 A. The purpose of my Direct Testimony is to provide an explanation of the
9 methodology used to develop and to support MERC's sales forecast for the 2023
10 Test Year.

11

12 Q. DOES MERC HAVE ANY COMPLIANCE REQUIREMENTS RELATED TO THE
13 SALES FORECAST THAT YOU ADDRESS IN THIS PROCEEDING?

14 A. Yes, the Minnesota Public Utilities Commission (the "Commission") has issued
15 orders requiring that MERC:

16 1) Prepare a summary spreadsheet that links together its test year sales
17 and revenue estimates, the class cost of service study ("CCOSS") and
18 its rate design schedules;²

19 2) Provide a spreadsheet that fully links together all raw data to the most
20 detailed information available and in a format that enables the full

² *In the Matter of the Application of Minnesota Energy Resources Corporation for Authority to Increase Rates for Natural Gas Service in Minnesota*, Docket No. G007,011/GR-08-835, Order After Reconsideration (September 14, 2009); *In the Matter of a Petition by Minnesota Energy Resources Corporation for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G011/GR-13-617, Findings of Fact, Conclusions, and Order at 63 (October 28, 2014).

- 1 replication of MERC’s process that the Company uses to calculate the
2 input data it uses in its test-year sales analysis;³
- 3 3) Provide a bridging schedule that fully links together old and new billing
4 systems, and demonstrates that there is no difference between the two
5 billing systems, in the event the Company updates, modifies, or changes
6 its billing system;⁴
- 7 4) Provide any, and all, data used for its sales forecast 30 days in advance
8 of its next general rate case;⁵
- 9 5) Provide detailed information sufficient to allow for replication of any and
10 all Company-derived forecast variables;⁶ and
- 11 6) Work with the Department of Commerce, Division of Energy Resources
12 (the “Department”) to address comments and concerns raised regarding
13 MERC’s forecast methodology in Docket No. G011/GR-17-563 (“2017
14 Rate Case”).⁷

³ *In the Matter of a Petition by Minnesota Energy Resources Corporation for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G011/GR-13-617, Findings of Fact, Conclusions, and Order at 63 (October 28, 2014).

⁴ *Id.*

⁵ *Id.* In Docket No. G011/GR-15-736, MERC also agreed to confirm in future forecast pre-filings that all relevant data files are provided to the Department.

⁶ *Id.*

⁷ *In the Matter of the Application of Minnesota Energy Resources Corporation for Authority to Increase Rates for Natural Gas Service in Minnesota*, Docket No. G011/GR-17-563, Findings of Fact, Summary of Public Testimony, Conclusions of Law, and Recommendations at ¶ 502 (Sept. 21, 2018). These findings, which were incorporated into the Commission’s final order, provide:

Beginning at least six months before MERC files its next rate case, MERC and the Department should work on the following forecasting-related issues:

- (1) whether MERC’s forecasting models have appropriate signs on the independent variables chosen by MERC;
- (2) use of actual weighted Heating Degree Days;
- (3) avoiding use of predicted residential customer counts as an independent variable in the Small C&I customer count model;
- (4) reducing misallocation or “ad hoc adjustments” of customer classifications between the Small C&I class (a decoupled class) and the Large C&I class (a non-decoupled class);
- (5) implementing improvements to transportation models; and,

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20

In the 2017 Rate Case, the Commission adopted the recommendation of the Administrative Law Judge to remove certain reporting requirements from Docket No. G011/GR-10-977 related to MERC’s forecasting, but to continue the requirement that MERC provide a bridging schedule that fully links together old and new billing systems, and demonstrates that there is no difference between the two billing systems, in the event the Company updates, modifies, or changes its billing system.⁸

Q. HAS MERC COMPLIED WITH THESE REQUIREMENTS?

A. Yes. MERC is addressing each of the above compliance requirements in this case as follows:

- 1) The spreadsheet required in the first requirement above, per Docket Nos. G007,011/GR-08-835 and G011/GR-13-617, is provided as Exhibit __ (JJP-D), Schedule 4 to my Direct Testimony.
- 2) The second Commission requirement above—a spreadsheet that fully links together all raw data to the most detailed information available and in a format that enables the full replication of MERC’s process used to calculate the input data it uses in its test-year sales analysis—was provided with MERC’s forecast pre-filing on September 30, 2022 in this docket.

(6) resolving data integrity issues, including those related to the Small C&I and Large C&I customer classes and the unavailability of historical data.
⁸ *In the Matter of the Application of Minnesota Energy Resources Corporation for Authority to Increase Rates for Natural Gas Service in Minnesota*, Docket No. G011/GR-17-563, Findings of Fact, Conclusions, and Order at 49, Order Point 19 (Dec. 26, 2018).

- 1 3) The third Commission requirement above does not apply in this case because
2 historical data from only one billing system was used to prepare the Test Year
3 forecast.⁹
- 4 4) In compliance with item four, MERC filed its test year sales forecast data on
5 September 30, 2022—more than 30 days in advance of this filing.¹⁰
- 6 5) MERC’s sales forecast pre-filing submitted in this docket on September 30,
7 2022 also provides detailed information to allow for replication of all
8 Company-derived forecast variables, in compliance with item five above.
- 9 6) In compliance with item six above, MERC had discussions with the
10 Department on March 20, 2019, April 17, 2020, and May 13, 2022,¹¹
11 regarding MERC’s forecasting methodology as described in Section II of my
12 testimony, below.
- 13
- 14

⁹ As noted above, the requirement to provide a bridging schedule that fully links together old and new billing systems, and demonstrates that there is no difference between the two billing systems applies only in the event the Company updates, modifies, or changes its billing system. *In the Matter of a Petition by Minnesota Energy Resources Corporation for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G011/GR-13-617, Findings of Fact, Conclusions, and Order at 63 (October 28, 2014). This compliance requirement was addressed in MERC’s last rate case, Docket No. G011/GR-17-563, in the Direct Testimony of Mr. Seth DeMerritt, with respect to MERC’s implementation of the Improved Customer Experience (“ICE”) billing system. In this proceeding, the requirement is not triggered because MERC has not modified its billing systems since its last rate case and historical data from only one billing system was used to prepare the test year forecast.

¹⁰ In accordance with the Commission’s Order in Docket No. G011/GR-15-736, MERC confirmed that all relevant data files were provided to the Department through eService, electronic mail, and delivered on a CD.

¹¹ MERC reached out to the Department in spring 2021 to hold annual discussions. The Department determined that with MERC not filing a rate case in 2021, an annual discussion was not warranted.

1 Q. CAN YOU SUMMARIZE THE RESULTS OF THE SUMMARY SPREADSHEET
2 COMPARING THE SALES FORECAST TO THE CCOSS AND THE RATE
3 DESIGN?

4 A. Yes. Exhibit ____ (JJP-D), Schedule 4 compares the MERC Minnesota sales and
5 fixed charge counts between what was generated by the sales forecast to what
6 was used in the CCOSS and the rate design model. Exhibit ____ (JJP-D),
7 Schedule 4 also compares the revenues generated in the rate design model to
8 those used in the CCOSS. In all instances, the values tie. It should be noted
9 that the values on Exhibit ____ (JJP-D), Schedule 4 only identify the units
10 associated with MERC's Minnesota customers, and that the sales forecast was
11 done at a Corporate MERC level. Therefore, the Michigan sales and fixed
12 charge counts are identified in Exhibit ____ (JJP-D), Schedules 1 through 3, but
13 do not flow through to the revenue deficiency calculation.

14

15 **III. CONSULTATION WITH THE DEPARTMENT**

16 Q. WHAT ITEMS DID YOU DISCUSS WITH THE DEPARTMENT WITH RESPECT
17 TO MERC'S FORECAST?

18 A. MERC met with the Department to discuss the concerns raised by the
19 Department with respect to MERC's forecast in the 2017 Rate Case and to
20 attempt to reach resolution regarding those issues for purposes of MERC's
21 forecast in this case. MERC also asked for general input and feedback and
22 provided an overview of its anticipated forecast methodology. In particular,
23 MERC and the Department discussed (1) whether MERC's forecasting models

1 have appropriate signs on the independent variables chosen by MERC; (2) use
2 of actual weighted Heating Degree Days (“HDDs”); (3) avoiding predicted
3 residential customer counts as an independent variable in the Small Commercial
4 and Industrial (“Small C&I”) customer count model; (4) reducing misallocation or
5 “ad hoc adjustments” of customer classifications between the Small C&I class (a
6 decoupled class) and the Large Commercial and Industrial (“Large C&I”) class (a
7 non-decoupled class); (5) implementing improvements to the transportation
8 models; and (6) resolving data integrity issues, including those related to the
9 Small C&I and Large C&I customer classes and the unavailability of historical
10 data.

11
12 Q. WHAT DID MERC AND THE DEPARTMENT DISCUSS WITH RESPECT TO
13 MERC'S FORECASTING MODELS HAVING APPROPRIATE SIGNS ON THE
14 INDEPENDENT VARIABLES CHOSEN?

15 A. MERC agreed that it would evaluate the signs of the estimated coefficients from
16 the models and, if necessary, be prepared to explain why any coefficient does
17 not have the expected sign.

18
19 Q. HAS MERC REVIEWED THE SIGNS OF THE INDEPENDENT VARIABLES
20 USED IN ITS MODELS TO CONFIRM THE COEFFICIENTS HAVE THE
21 EXPECTED SIGN?

22 A. Yes, MERC reviewed the independent variables for all models to confirm that the
23 signs of the coefficients are consistent with MERC's expectations.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

Q. WHAT DID MERC AND THE DEPARTMENT DISCUSS WITH RESPECT TO THE USE OF ACTUAL WEIGHTED HEATING DEGREE DAYS?

A. MERC confirmed with the Department that the Company would only use actual weather data in its regression models. In preparing the 2023 Test Year sales forecast, the historical time series used in the regression models only contained actual sales and actual weighted heating degree days. No weather normalized historical data were used in the regression models.

Q. WHAT DID MERC AND THE DEPARTMENT DISCUSS REGARDING AVOIDANCE OF PREDICTED RESIDENTIAL CUSTOMER COUNTS AS AN INDEPENDENT VARIABLE IN THE SMALL C&I CUSTOMER COUNT MODEL?

A. In the Company's 2017 Rate Case, the Department expressed concern with MERC's use of a predicted residential customer variable as an independent variable in its Small C&I customer class regression model, because the independent variable requires another layer of forecasting. The Department noted that the increase in Small C&I customers may be directly impacted, in general, by the economy as opposed to increases in residential customers.

MERC and the Department discussed the use of alternative independent variables, such as demographic variables, to address the Department's identified concerns. MERC agreed that it would evaluate the use of such demographic variables in place of using residential customer counts as an independent

1 variable in its Small C&I customer count model. As discussed below, MERC has
2 incorporated a county-level population variable representing the Company's
3 service territory in the C&I customer count model, and is not using a predicted
4 residential customer variable in the C&I model. The demographic variables
5 incorporated into the customer count regression models explain, or are strongly
6 correlated with, the change in historical actual customer counts.

7
8 MERC believes that using independent variables that represent the theoretical
9 drivers of customer growth is the best approach and, based on discussion,
10 MERC understands that the Department concurs with this approach. MERC also
11 recognizes that there may be limitations with respect to the actual and forecasted
12 demographic data available, which could lead to unreasonable or less than
13 satisfactory model results. For example, due to the more heterogeneous make-
14 up of the C&I classes (as compared to the Residential class), available
15 demographic variables may not be strongly correlated with historical actual
16 customer counts. While MERC did not encounter issues with the proposed
17 demographic variable included in the customer count models in this filing,
18 limitations of available data may necessitate or support the use of a different
19 variable or modeling approach in the future, including using highly correlated
20 residential customer class customer counts as a substitute. In the event MERC
21 makes such a change in the future, MERC will provide testimony supporting the
22 use of such variable.

23

1 Q. WHAT DID MERC AND THE DEPARTMENT DISCUSS REGARDING
2 REDUCTION OF MISALLOCATION OR “AD HOC ADJUSTMENTS” OF
3 CUSTOMER CLASSIFICATIONS BETWEEN THE SMALL C&I AND THE
4 LARGE C&I CLASSES?

5 A. In the Company’s 2017 Rate Case, the Department expressed concern that
6 MERC’s C&I customers were not being classified correctly and that their
7 historical usage was not captured in the appropriate class. In discussions with
8 the Department, MERC noted that this issue had been addressed with the
9 establishment of the new C&I classes in MERC’s 2017 Rate Case and the
10 elimination of any decoupling associated with C&I customers. MERC also noted
11 that the same billing system was utilized before and after the new rate classes
12 went into effect in mid-2019. The C&I sales and customer count forecasts for
13 classes 1-3 use tariff level billing data to develop allocations to the rate schedule
14 level.

15
16 Additionally, as part of the Company’s 2017 Rate Case, MERC established an
17 annual review process to ensure customers are assigned to the appropriate rate
18 class or are reassigned based on their actual usage. In particular, MERC’s tariff
19 sheet 8.39 provides for an annual review of all firm and interruptible commercial
20 and industrial customer accounts to ensure customer annual usage is within the
21 usage requirements of the specified rate schedule. As discussed in the 2017
22 Rate Case, the inclusion of a +/- ten percent band in the annual review mitigates
23 against frequent switching for customers on the cusp of two classes. As

1 described in the Direct Testimony of Company witness Ms. Joylyn Hoffman
2 Malueg, MERC has reported each year on the results of its annual customer
3 reviews, which have resulted in a very small percentage of customers being
4 reassigned based on review of customer usage.

5
6 Q. DO MERC'S C&I FORECASTS ACCURATELY REFLECT HOW CUSTOMERS
7 MAY MOVE FROM ONE CLASS TO ANOTHER BASED ON USAGE AND THE
8 APPROVED ANNUAL REVIEW PROCESS?

9 A. Yes, by using actual tariff level billing data and conducting consistent annual
10 evaluations of customer usage and customer class assignments, the regression
11 models accurately capture customer movement between customer classes
12 based on the results of the annual evaluations.

13
14 Q. HAS MERC APPLIED ANY AD HOC ADJUSTMENTS TO THE SALES
15 FORECAST IN THIS CASE?

16 A. No, there were not any ad hoc adjustments made to the sales and customer
17 count forecasts.

18
19 Q. DID MERC AND THE DEPARTMENT DISCUSS ANY OTHER ISSUES OR
20 CONCERNS WITH RESPECT TO ENSURING DATA INTEGRITY?

21 A. As already discussed above, in MERC's 2017 Rate Case, the Department raised
22 concerns regarding the reassignment of customers in the Small and Large C&I
23 classes. MERC and the Department discussed this issue, as described above.

1 MERC also worked with revenue accounting to correct any instances of negative
2 sales in the monthly historical data series used to forecast test year sales.

3
4 Q. WHAT DID MERC AND THE DEPARTMENT DISCUSS REGARDING
5 IMPLEMENTATION OF IMPROVEMENTS TO THE TRANSPORTATION
6 MODELS?

7 A. In MERC's 2017 Rate Case, the Department expressed concerns with MERC's
8 transportation forecast under-estimating transportation sales volumes. In
9 discussions with the Department, MERC indicated that the Company was
10 planning to forecast its largest customers individually to address the
11 Department's identified concerns with previous transportation forecasting. The
12 Department also asked about MERC's plans to forecast sales to large transport
13 customers that experienced decreases in historical usage due to temporary
14 idling. As described in greater detail in Section IV of my testimony, MERC
15 considered the impact of any historical periods when idling or production declines
16 were present during the preparation of the 2023 Test Year forecast. This
17 approach ensured that the forecasts accurately reflect projected customer usage
18 in the future absent undue influence from historical temporary production
19 declines or idling.

20
21
22

1 Q. HOW DO THE CHANGES IMPLEMENTED FOR MERC'S TRANSPORTATION
2 FORECAST ADDRESS THE DEPARTMENT'S PREVIOUS CONCERNS?

3 A. The 2023 Test Year sales forecast methodology was revised to improve the
4 accuracy and transparency of the transportation customer class sales forecast.
5 Previously, the transportation customer class sales forecast was based on a
6 regression model for the entire class by PGA. The first change consisted of
7 dividing the transportation customer class into two groups: 1) small transportation
8 customers; and 2) large transportation customers. The second step entailed
9 forecasting the small transportation customers in aggregate using a regression
10 model while the large transportation customers, including the taconite mines,
11 were forecasted individually. There are several benefits to using this revised
12 approach. First, the total sales to the transportation customer class are highly
13 concentrated among a relatively small number of large customers. Forecasting
14 the largest customers on an individual basis enabled the inclusion of customer-
15 specific trends and intelligence. Second, the small transportation and large
16 transportation groups have unique usage patterns. For instance, the usage
17 profile of a taconite mine customer (large customer) is likely to be very different
18 from the usage profile of a school (small customer). The revised forecasting
19 methodology enables these two groups of customers to be modeled more
20 accurately based on their usage patterns.

21

22

1 Q. DID MERC AND THE DEPARTMENT DISCUSS ANY ADDITIONAL ITEMS
2 WITH RESPECT TO MERC'S FORECAST?

3 A. Yes, MERC answered additional general questions from the Department
4 regarding the Company's anticipated sales forecasting methodology and
5 approach and anticipated rate case filing.
6

7 Q. WHAT DO YOU CONCLUDE REGARDING THE ISSUES THE DEPARTMENT
8 RAISED IN MERC'S LAST RATE CASE?

9 A. I conclude that MERC and the Department worked together to address each of
10 the issues and concerns the Department raised with respect to MERC's sales
11 forecast in the Company's last rate case. As described in greater detail below,
12 MERC's sales forecasting methodology for the 2023 Test Year is reasonable,
13 fully supported, and has incorporated feedback from the Department based on
14 various continued discussions over the years since MERC's 2017 Rate Case.
15

16 Q. DOES MERC HAVE A POSITION ON THE CONTINUATION OF THE
17 REQUIRED MEETINGS WITH THE DEPARTMENT?

18 A. Yes, MERC has found the discussions with the Department to be constructive
19 and beneficial with respect to the concerns raised in the 2017 Rate Case and
20 described above. MERC supports continuing these discussions in the future if
21 new issues arise in this or other dockets. Absent any new issues, however,
22 MERC respectfully requests elimination of the requirement for the Company to
23 meet with the department six months in advance of filing a general rate case.

1 The Company would intend to continue to engage with the Department on any
2 specific issues or concerns that arise in the future.

3
4 **IV. PROPOSED SALES FORECAST**

5 Q. PLEASE EXPLAIN THE METHODOLOGY USED TO DEVELOP MERC'S 2023
6 TEST YEAR GAS SALES FORECAST.

7 A. MERC'S 2023 test year sales forecast was developed using several methods
8 including: 1) Ordinary Least Squares ("OLS") regression models; 2) individual
9 customer forecasts; and 3) rate schedule level forecasts. The details of each of
10 these methodologies are discussed below. The resulting 2023 Test Year sales
11 forecast is attached to my testimony as Exhibit ____ (JJP-D), Schedule 1.

12
13 Q. HOW DOES THE FORECASTING METHODOLOGY USED IN THIS FILING
14 COMPARE TO THE METHODOLOGY USED IN MERC'S LAST RATE CASE?

15 A. MERC used the OLS regression methodology for all of its forecast models in the
16 2017 Rate Case. Forecasts were conducted based on MERC's three PGA
17 systems at the revenue class level within each PGA, namely, Residential, Small
18 C&I, Large C&I, Joint, Interruptible, Transport, and Company Use. As noted
19 above and discussed in greater detail later in my Direct Testimony, while the
20 Company continued to use OLS regression models for a number of its customer
21 class forecasts, the Company has refined the regression modeling. Additionally,
22 MERC has utilized individual customer forecasts and rate schedule forecasts for
23 some classes. Individual and rate schedule level forecasts allow for customers

1 and rate schedules less impacted by trend variables to be developed separately.
2 They also ensure that customer-specific information is included within the
3 forecast and that usage anomalies do not impact forecasts.
4

5 Q. PLEASE EXPLAIN IN DETAIL THE METHODOLOGY USED TO PREPARE
6 MERC'S 2023 TEST YEAR GAS SALES FORECAST.

7 A. 1) OLS Regression Models

8 The OLS regression models were estimated in MetrixND.¹² The forecasts were
9 developed with monthly historical calendar data through May 2022. The normal
10 weather variable, HDDs, was based on a rolling 20 year average (2002 through
11 2021) for MERC's two PGA areas: MERC-NNG (7,231 HDD) and MERC-
12 Consolidated (8,624 HDD). The historical time series used in the regression
13 models only contained actual weighted HDDs. No weather normalized historical
14 data was used in the regression models. The forecasts developed through OLS
15 methodology were:

- 16 • Residential,
- 17 • Commercial and Industrial Classes 1-3 ("Firm C&I"),
- 18 • Interruptible Classes 2-4,
- 19 • Firm/Interruptible¹³ ("F/I") Class 2, and
- 20 • Transportation Classes 2-4 ("Small Transport").

21

¹² MetrixND is a statistical software package developed by Itron.

¹³ Formerly referred to as "Joint."

1 Residential sales were forecasted using a combination of average use per
2 customer and customer count models. The results of both models were
3 multiplied together to develop the test year sales forecast. The Residential
4 forecast also includes Residential Farm Tap customers. The historical forecast
5 period used within the Residential regression model was January 2018 through
6 May 2022.

7
8 Firm C&I was forecasted using a combination of average use per customer and
9 customer count models. The results of both models were multiplied together to
10 develop the test year sales forecast. The historical forecast period used within
11 the regression model was July 2019 through May 2022. Firm C&I only includes
12 customers that have firm sales (*i.e.*, no interruptible sales) and there are no
13 customers in Firm C&I Classes 4 through 5 in the historical period or the test
14 year.

15
16 Interruptible Classes 2 through 4 and F/I Class 2 were forecasted in aggregate
17 using an OLS model projecting sales. The projected sales were then allocated to
18 the individual rate schedules (*i.e.*, Interruptible Classes 2 through 4 and F/I Class
19 2). The historical forecast period used within the regression model was
20 September 2019 through May 2022. Interruptible Classes 2 through 4 only
21 include interruptible sales (*i.e.*, no firm sales) and F/I Class 2 includes customers
22 that have both firm and interruptible sales. An OLS model was used to forecast
23 customer counts for the Interruptible Classes 2 through 4 in aggregate (however,

1 the customer count forecast for F/I Class 2 was based on historical actual
2 customer counts as of May 2022 because there were fewer than 10 customers in
3 the class and no changes in customer counts expected in the test year). The
4 projected customer counts were then allocated to individual rate schedules. The
5 historical forecast period used within the regression model was November 2020
6 through May 2022. There are no customers in Interruptible Classes 1 and 5 or
7 F/I Classes 1 or 3 through 5 in the historical period or test year.

8
9 Small Transport was forecasted using sales and customer count models. The
10 historical forecast period used within the regression models was January 2016
11 through May 2022 for sales and January 2018 through May 2022 for customer
12 counts. Small Transport includes firm and interruptible sales for Transport
13 Classes 2 through 4 excluding Transport Class 2 CIP Exempt, Transport Power
14 Generation, Transport Flex, and Transport Taconite, which were individually
15 forecasted. There are no customers in Transport Class 1 in the historical period
16 or test year forecast.

17
18 The inputs to the OLS methodology included economic and demographic
19 variables, weather variables, binary variables, and time trend variables. The
20 forecasting models also incorporated various seasonal and autoregressive
21 components where needed to correct for seasonality¹⁴ and serial correlation¹⁵ in

¹⁴ Characteristic of time series data which data experiences regular and predictable changes that recur every calendar year.

¹⁵ Relationship between a variable's current value given its past values.

1 the data patterns. The OLS forecast period was from June 2022 through 2027,
 2 with 2023 being the test year for this rate case. The estimated average use per
 3 customer (“AvgUse”) regression specification using the OLS construct is:

$$\text{AvgUse}_t = \beta_0 + \beta_1 \text{HDD65}_t + \beta_2 X_t + \varepsilon_t$$

4
 5 Where β_1 and β_2 represent independent variables as described in table below.

6

<u>MERC</u>		
<u>Customer Group</u>	<u>Dependent Variable</u>	<u>Independent Variables</u>
Residential	Residential Average Use	Weather – HDD65 Residential NG Furnace Intensity Gas Price Autoregressive – AR(1) ¹⁶ Moving Average – MA (1) ¹⁷
Residential	Residential Customers	MN Population (Weighted by County) Autoregressive – AR(1) Moving Average – MA (1)
Commercial and Industrial (Class 1-3)	Commercial and Industrial (Class 1-3) Average Use	Weather – HDD65 Commercial and Industrial Heat Intensity Gas Price Autoregressive – AR(1)
Commercial and Industrial (Class 1-3)	Commercial and Industrial (Class 1-3) Customers	MN Population (Weighted by County) Binary Jan, Feb, Mar, Apr, May, Jun, Jul, Aug, Sep, Oct, Nov Autoregressive – AR(1) Moving Average – MA (1) Moving Average – MA (2)

¹⁶ Autoregressive model (“AR”): This model relates the dependent variable (for example, sales) to its own historical values. An autoregressive process is one whose behavior is determined by its own past values, plus an unpredictable shock.

¹⁷ Moving Average model (“MA”): This forecasting method is the average of the last “m” observations. It is useful for time series with a slowly changing mean. That is, a moving average model is conceptually a linear regression of the current value of the series against previous (unobserved) white noise error terms or random shocks.

<u>MERC</u>		
<u>Customer Group</u>	<u>Dependent Variable</u>	<u>Independent Variables</u>
Interruptible (Class 2-4) and F/I Class 2	Interruptible (Class 2-4) and F/I Class 2 Sales	Weather – HDD65 Binary – Bill_Corr_Bin (Dec 2019)
Interruptible (Class 2-4)	Interruptible (Class 2-4) Customers	Binary – Jan, Feb, Mar, Apr, May, Jun, Jul, Aug, Sep, Oct, Nov Autoregressive – AR(1)
Transportation (Small Transport)	Transportation (Small Transport) Sales	Constant Weather – HDD65 GSP_Manufacturing_Baseline Autoregressive – AR(1)
Transportation (Small Transport)	Transportation (Small Transport) Customers	MN Population (Weighted by County) Binary – Jan, Feb, Mar, Apr, May, Jun, Jul, Aug, Sep, Oct, Nov Autoregressive – AR(1) Autoregressive – AR(2) Autoregressive – AR(3) Moving Average – MA (1)

1
2
3
4
5
6
7
8
9
10

The OLS models' results were evaluated through various methods to judge goodness of fit and significance. Within each model, the adjusted R² value was used to evaluate the overall goodness of fit of the model. The T-Statistics, F-Statistics, and P-Values were judged for reasonableness and significance on a model-by-model basis. Also, each dependent variables' coefficient was evaluated to verify that the signs are in the correct direction and are reasonably sized. Finally, the Durbin Watson Statistic, which is a test for autocorrelation in a regression model's output, was also verified in each model.

1 2) Individual Customer Forecasts

2 The forecasts developed through individual forecast methodology were:

- 3 • Commercial and Industrial-IA rate schedule;
- 4 • Interruptible Power Generation; and
- 5 • Transport Class 5, Transport Class 2 CIP Exempt, Transport Power
- 6 Generation, Transport Flex, and Transport Taconite (“Large Transport”).

7

8 The Commercial and Industrial IA and Interruptible Power Generation rate

9 schedule forecasts were prepared at the individual customer level using historical

10 growth rates. The historical growth rates were derived from historical actual

11 sales for the period April 2020 through May 2022. The growth rates were then

12 multiplied by historical actual sales from the most recent 12-month period.

13 MERC believes that for these customer groups, recent history is most

14 representative of projected future use in the test year and the Company does not

15 have any customer-specific intelligence that would indicate otherwise. The

16 customer count forecasts were based on the most recent historical observation

17 (May 2022) and held constant due to no expected change to customer counts in

18 the test year.

19

20 The Large Transportation forecast was developed on a customer level basis,

21 taking into account historical usage (January 2019 through June 2022) and

22 customer intelligence. The customer count forecast was held constant based on

23 the most recent historical observation (June 2022), which is consistent with

1 customer intelligence.¹⁸ There were three unique methods used to forecast the
2 Taconite Mine customers to address the temporary idling or production declines
3 in the second and third quarter of 2020 due to the pandemic and incorporate
4 customer-specific intelligence:

- 5 1) The first method was the default method and based on actual sales
6 from January 2021 through May 2022;
- 7 2) The second method applied to one customer and was based on actual
8 sales from July 2019 through June 2022; and
- 9 3) The third method applied to one customer which was temporarily idled
10 at the time that the forecast was prepared. The 2023 Test Year
11 forecast assumed a restart date based on information available to
12 MERC.

14 3) Rate Schedule Level Forecasts

15 The forecasts developed through rate schedule level forecast methodology were:

- 16 • Commercial and Industrial – Farm Tap and
- 17 • Interruptible – Ag Grain Dryers.

18
19 The Commercial and Industrial Farm Tap and Interruptible Ag Grain Dryer rate
20 schedule forecasts were prepared at the individual customer level using historical
21 growth rates. The historical growth rates were derived from historical actual

¹⁸ MERC assumed no changes in the number of Large Transportation customers due to the absence of a projection of customer switching into and out of the transportation rate schedules.

1 sales for the period April 2020 through May 2022. The growth rates were then
2 multiplied by historical actual sales from the most recent 12-month period.
3 MERC believes that recent history is most representative of projected future use
4 in the test year for these customer classes and does not have any customer-
5 specific intelligence that would indicate otherwise. The customer count forecasts
6 were based on the most recent historical observation (May 2022) and held
7 constant due to no expected changes in the test year. Using actual customer
8 counts as of May 2022 is reasonable because, as discussed in the Direct
9 Testimony of Ms. Joylyn Hoffman Malueg, no new Farm Tap customers are
10 being added to MERC's system, and farm tap service offerings are closed for
11 new customers. Additionally, for the Ag Grain Dryer classes, the assumption of
12 constant customer counts is appropriate because these are small and unique
13 classes of customers that are not affected by the demographic trends driving the
14 customer growth in C&I classes 1–3.

15
16 Q. WERE THE 2021 HISTORIC SALES USED IN THIS FILING WEATHER
17 NORMALIZED?

18 A. Yes, the actual calendar sales for 2021 used in this filing and shown in Exhibit
19 ____ (JJP-D), Schedule 1 are weather normalized based on the methodologies
20 described below.

21
22

1 Q. DID MERC MAKE ANY EXOGENOUS, OR POST REGRESSION,
2 ADJUSTMENT TO THE SALES OR CUSTOMER COUNT MODEL OUTPUTS?

3 A. No.

4

5 **V. DEVELOPMENT OF WEATHER DATA**

6 Q. ARE THE WEATHER STATIONS USED TO CALCULATE MERC'S SALES
7 FORECAST IN THIS PROCEEDING THE SAME AS THOSE USED IN MERC'S
8 LAST RATE CASE?

9 A. Yes, they are the same weather stations used in the 2017 Rate Case.

10

11 Q. DID MERC USE THE SAME PROCESS TO DEVELOP THE ACTUAL
12 WEATHER USED IN THE OLS REGRESSION MODELS IN THIS CASE AS
13 THE COMPANY'S 2017 RATE CASE?

14 A. Yes. MERC utilized the same process to develop the historical actual weather
15 used in the OLS regression models in this case as it did in the Company's 2017
16 Rate Case. As described below, MERC used a "virtual weather station," which is
17 a composite of multiple weather stations located in or near MERC's service
18 territory. The actual weather for each of these weather stations was weighted
19 based on the number of customers associated with each weather station. The
20 weightings from the 2017 Rate Case, as shown in the table below, were used in
21 the OLS regression models for the 2023 Test Year with respect to historical
22 actual weather. As described below, updated weightings were used to calculate
23 the normal weather in this filing.

Weather Station	Consolidated	NNG	Total
BMJ-Bemidji	37.6%	1.5%	7.1%
COQ-Cloquet	23.7%	9.5%	11.7%
FGO-Fargo	14.1%	0.0%	2.2%
INL-International Falls	24.5%	0.0%	3.8%
MSP-Minneapolis	0.1%	31.0%	26.3%
ROC-Rochester	0.0%	46.6%	39.3%
OTG-Worthington	0.0%	11.4%	9.6%
Total	100%	100%	100%

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18

Q. PLEASE EXPLAIN HOW THE 2023 TEST YEAR NORMAL WEATHER USED IN THE OLS REGRESSION MODELS WAS DEVELOPED.

A. DTN provided the raw weather data for seven regional weather stations (Bemidji, Cloquet, Fargo, International Falls, Minneapolis, Rochester, and Worthington). The data from the individual weather stations was then weighted to create variables for “virtual weather stations” that are representative of the overall weather for MERC’s two PGAs: MERC-Consolidated and MERC-NNG. The weather stations used for MERC-Consolidated were Bemidji, Cloquet, Fargo, International Falls, Minneapolis, Rochester, and Worthington. The weather stations used for MERC-NNG were Bemidji, Cloquet, Minneapolis, Rochester, and Worthington.

The weightings were developed by first determining the number of Residential and Commercial and Industrial (“C&I”) firm customers MERC had, by zip code, as of January 2022. Each zip code was then assigned to a weather station based on proximity. Once the assignments were made, the weightings were calculated by taking the number of customers assigned to each weather station

1 divided by the total number of customers. The resulting weightings are reflected
2 in the following table:

Weather Station	Consolidated¹⁹	NNG	Total
BMJ-Bemidji	38.1%	1.5%	7.1%
COQ-Cloquet	23.1%	9.5%	11.6%
FGO-Fargo	14.8%	0.0%	2.3%
INL-International Falls	23.8%	0.0%	3.6%
MSP-Minneapolis	0.1%	31.7%	26.9%
ROC-Rochester	0.1%	46.5%	39.4%
OTG-Worthington	0.1%	10.8%	9.1%
Total	100%	100%	100%

3
4 Actual degree days were calculated by summing the hourly temperatures each
5 day by weather station. Next, the daily average temperature was calculated for
6 each weather station, and the number of HDDs (using 65 °F as the base) was
7 determined. Finally, the weighting factors were applied to the HDD data for each
8 day and weather station.

9
10 The normal HDDs were calculated by summing the normal hourly temperatures
11 each day by weather station, based on the 20-year average weather from 2002
12 through 2021. Next, the normal daily average temperature was calculated for
13 each weather station, and the number of HDDs (using 65 °F as the base) was
14 determined. Finally, the weighting factors were applied to the Normal HDD data
15 for each day and weather station.

16

¹⁹ The total for Consolidated as reflected in this summary table is equal to 100.1% due to rounding. Actual total weather station weightings for Consolidated equal 100%.

1 **VI. WEATHER NORMALIZATION MODELS AND METHODOLOGY**

2 Q. PLEASE EXPLAIN THE PROCEDURE USED TO DEVELOP THE WEATHER
3 NORMALIZED ADJUSTMENT TO SALES.

4 A. Normal weather was defined as the average daily temperature over the 20-year
5 period from 2002 through 2021. As discussed earlier, this results in 7,231 HDDs
6 for MERC-NNG and 8,624 HDDs for MERC-Consolidated. The weather
7 normalized sales are based on a mathematical model that multiplies the daily
8 average actual sales of July and August of the previous year by the number of
9 days in the month to determine the total base load sales. The total base load
10 sales are then subtracted from actual monthly sales, resulting in weather
11 sensitive sales. The weather sensitive sales are then divided by actual HDDs to
12 give the weather sensitive use per HDD. The final total weather normalized
13 sales are equal to weather sensitive use per HDD multiplied by the normal HDDs
14 for that month, plus total base load sales. The final weather sensitive sales plus
15 base load sales will equal actual sales if the weather adjustment is zero.

16
17 Q. DID MERC USE THIS PROCEDURE IN ITS LAST RATE CASE?

18 A. Yes, MERC used the same method in the 2017 Rate Case.

19

20

21

1 **VII. CUSTOMER CHARGE COUNTS**

2 Q. PLEASE EXPLAIN THE PROCEDURES USED TO DEVELOP CUSTOMER
3 CHARGE COUNTS FOR THE 2023 TEST YEAR.

4 A. The customer charge counts are based on the results of the customer count
5 models discussed previously with an exception for one Transport Flex customer.
6 The Transport Flex customer receives three customer charges for one forecasted
7 customer based on its billing and metering configuration, but is only charged one
8 monthly administrative fee.

9
10 **VIII. FIRM/INTERRUPTIBLE FIRM SALES FORECAST**

11 Q. PLEASE EXPLAIN HOW THE FIRM SALES TO CUSTOMERS TAKING
12 SERVICE ON THE FIRM/INTERRUPTIBLE RATE SCHEDULES WERE
13 DEVELOPED FOR THE TEST YEAR.

14 A. Customers taking service on the Firm/Interruptible rate schedules have the ability
15 to nominate a portion of their load as firm with the remainder of their load served
16 as interruptible. The 2023 Test Year firm sales for the Firm/Interruptible rate
17 schedules are shown in Exhibit ____ (JJP-D), Schedule 3. The firm sales were
18 estimated using a two-step process. First, total sales for each of the
19 Firm/Interruptible rate schedules was projected or allocated, with total sales
20 defined as the sum of firm and interruptible sales. Second, the total sales were
21 divided into firm and interruptible sales by rate schedule based on the historical
22 relationship between firm and interruptible sales by rate schedule using actual
23 sales from 2021.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

IX. FORECAST RESULTS AND CONCLUSIONS

Q. IN YOUR OPINION, DOES THE SALES FORECAST METHODOLOGY THAT YOU FOLLOWED PROVIDE A REASONABLE BASIS FOR ESTABLISHING RATES IN THIS CASE?

A. Yes, the sales forecast methodology presented provides a reasonable estimate of proposed test year sales.

Q. IN YOUR OPINION, DOES THE SALES FORECAST PROVIDE A REASONABLE BASIS FOR ESTABLISHING RATES IN THIS CASE?

A. Yes, the sales forecast is a reasonable estimate of the proposed test year sales based on the information known and available at the time the forecast was prepared and is a reasonable basis for establishing rates in this proceeding.

Q. HOW DOES THE SALES FORECAST FOR MERC'S 2023 TEST YEAR COMPARE TO THE FORECAST APPROVED IN MERC'S LAST RATE CASE?

A. The sales variances shown below are represented as annual compound growth rates ("ACGR"). Residential sales for the 2023 Test Year are projected to be higher than the forecast approved in MERC's last rate case by 0.7%. Commercial and Industrial sales for the 2023 Test Year are projected to be higher than the forecast approved in MERC's last rate case by 3.1%. Combined sales to Interruptible and Firm/Interruptible system sales customers for the 2023 Test Year are projected to be lower than the forecast approved in MERC's last

1 rate case by 5.7%. Total System sales for the 2023 Test Year are projected to
2 be higher than the forecast approved in MERC's last rate case by 0.9%.

3 Transportation sales for the 2023 Test Year are projected to be higher than the
4 forecast approved in MERC's last rate case by 4.6%. Total throughput for the
5 2023 Test Year is projected to be higher than the forecast approved in MERC's
6 last rate case by 3.1%.

7
8 Q. HOW DOES THE SALES FORECAST FOR MERC'S 2023 TEST YEAR
9 COMPARE TO ACTUAL SALES IN THE HISTORIC YEAR 2021?

10 A. The sales variances described below are based on sales for the Minnesota
11 jurisdiction only and represented as ACGRs. Residential sales for the 2023 Test
12 Year are 1.7% higher than 2021 weather-normalized sales. Commercial and
13 Industrial sales for the 2023 Test Year are 2.8% higher than 2021 weather-
14 normalized sales. Combined sales to Interruptible and Firm/Interruptible system
15 sales customers for the 2023 Test Year are 4.0% higher than 2021 weather-
16 normalized sales. Total system sales for the 2023 Test Year are 2.3% higher
17 than 2021 weather-normalized sales. Transportation sales for the 2023 Test
18 Year are 0.5% lower than 2021 weather-normalized sales. Total throughput for
19 the 2023 Test Year is projected to be higher than 2021 weather-normalized sales
20 by 0.6%.

21
22 Q. DOES THIS CONCLUDE YOUR TESTIMONY ON THE SALES FORECAST?

23 A. Yes, it does.

**Minnesota Energy Resources Corporation
 Proposed Test Year Throughput and Adjustments
 For the 12 Months Ending, December 31, 2023**

<u>Line</u>	<u>Rate Class</u> (col. 1)	2021 Historical Throughput (Therms) (col. 2)	2021 Weather Normalization (Therms) (col. 3)	Historical Adjusted Throughput (Therms) (col. 4)	2022 Growth (Therms) (col. 5)	2022 Forecast Throughput (Therms) (col. 6)	2023 Growth (Therms) (col. 7)	2023 Forecast Throughput (Therms) (col. 8)
1	Residential	177,234,202	6,898,011	184,132,213	22,321,179	206,453,392	(16,033,339)	190,420,054
<u>C&I General Service Rate</u>								
6	Class 1	7,752,806	184,427	7,937,233	2,921,482	10,858,715	(2,120,091)	8,738,625
	Class 2	92,237,848	2,194,197	94,432,045	15,206,254	109,638,299	(10,118,470)	99,519,830
	Class 3	9,313,620	221,557	9,535,177	863,324	10,398,501	(432,100)	9,966,401
14	Total C&I General Service	<u>109,304,274</u>	<u>2,600,181</u>	<u>111,904,455</u>	<u>18,991,061</u>	<u>130,895,516</u>	<u>(12,670,661)</u>	<u>118,224,855</u>
<u>Interruptible & Joint</u>								
15	Interruptible	25,114,268		25,114,268	2,230,659	27,344,927	(131,716)	27,213,211
22	Joint	336,111		336,111	(66,724)	269,387	56,733	326,119
23	Total Interruptible & Joint	<u>25,450,379</u>	<u>0</u>	<u>25,450,379</u>	<u>2,163,935</u>	<u>27,614,314</u>	<u>(74,983)</u>	<u>27,539,331</u>
24	Transportation	544,435,241		544,435,241	1,706,789	546,142,030	(6,737,546)	539,404,484
32	Total MERC-Minnesota	<u>856,424,096</u>	<u>9,498,192</u>	<u>865,922,288</u>	<u>45,182,964</u>	<u>911,105,252</u>	<u>(35,516,529)</u>	<u>875,588,723</u>
34	Company Use	297,793				319,938		309,126
37	Gas Loss and Unaccounted For	17,397,089				(38,619,192)		19,301,778
38	Sales Company Use + Lost Gas Total MERC	<u>874,118,977</u>				<u>872,805,999</u>		<u>895,199,627</u>

* Excludes sales data for Michigan taconites

**Minnesota Energy Resources Corporation
Proposed Weather Normalized Volumes & Revenues
For the 12 Months Ending, December 31, 2021**

<u>Line</u>	<u>Rate Class</u> (col. 1)	2021 <u>Weather Normalized</u> <u>Therms</u> (col. 2)	<u>Distribution</u> <u>Charge</u> (col. 3)	2021 <u>Weather</u> <u>Normalized</u> <u>Revenues</u> (col. 4)
<u>Residential Rate</u>				
1	Residential-NNG	5,891,885	\$ 0.24686	\$ 1,454,471
2	Residential-Consolidated	1,006,126	\$ 0.24686	\$ 248,372
4	Total Residential	<u>6,898,011</u>		<u>\$ 1,702,843</u>
<u>C&I General Service Rate</u>				
	NNG Class 1	138,930	\$ 0.22251	\$ 30,913
	Consolidated Class 1	45,498	\$ 0.22251	\$ 10,124
	NNG Class 2	1,707,730	\$ 0.16857	\$ 287,872
	Consolidated Class 2	486,467	\$ 0.16857	\$ 82,004
	NNG Class 3	183,094	\$ 0.12453	\$ 22,801
	Consolidated Class 3	38,463	\$ 0.12453	\$ 4,790
	Total C&I General Service	<u>2,600,181</u>		<u>\$ 438,503</u>
<u>Interruptible & Joint</u>				
14	Interruptible-NNG			\$ -
15	Joint-NNG			\$ -
16	Interruptible-Consolidated			\$ -
17	Joint-Consolidated			\$ -
20	Total Interruptible & Joint	<u>0</u>		<u>\$ -</u>
<u>Transportation</u>				
21	Peak Sales-NNG (Nov-Mar)			\$ -
22	Off Peak Sales-NNG (Apr-Oct)			\$ -
23	Peak Sales-Consolidated (Nov-Mar)			\$ -
24	Off Peak Sales-Consolidated (Apr-Oct)			\$ -
27	Total Transportation	<u>0</u>		<u>\$ -</u>
<u>Summary</u>				
28	MERC-NNG Total	7,921,638		1,796,057
29	MERC-Consolidated Total	<u>1,576,554</u>		<u>345,290</u>
31	Total MERC-Minnesota	<u>9,498,192</u>		<u>2,141,346</u>

Minnesota Energy Resources Corporation
Actual Year Calendar Sales
For the 12 Months Ending, December 31, 2021

All Units in Therms

Table with columns: Calendar, Jan-21, Feb-21, Mar-21, Apr-21, May-21, Jun-21, Jul-21, Aug-21, Sep-21, Oct-21, Nov-21, Dec-21, Total. Rows include categories like NNG SALES, CONSOLIDATED SALES, NNG TRANSPORT, CONSOLIDATED TRANSPORT, and Company Use Gas.

**Minnesota Energy Resources Corporation
Proposed Test Year Fixed Charge Counts
For the 12 Months Ending, December 31, 2023**

<u>Line</u>	<u>Rate Class</u> (col. 1)	Fixed Charge Counts 2021 Total Annual <u>Per Books</u> (col. 2)	2022 <u>Growth</u> (col. 3)	Fixed Charge Counts <u>2022 Forecast</u> (col. 4)	2023 <u>Growth</u> (col. 5)	Fixed Charge Counts <u>2023 Forecast</u> (col. 6)
	<u>Residential Rate</u>					
1	Residential	2,654,038	16,904	2,670,942	6,499	2,677,441
	<u>C&I General Service Rate</u>					
6	Class 1	118,693	1,647	120,340	(830)	119,510
	Class 2	161,540	(658)	160,883	1,508	162,391
13	Class 3	817	(45)	772	31	804
14	Total C&I General Service	<u>281,051</u>	<u>944</u>	<u>281,995</u>	<u>710</u>	<u>282,705</u>
	<u>Interruptible & Joint</u>					
15	Interruptible	5,446	(279)	5,167	(201)	4,966
16	Joint	62	(2)	60	-	60
23	Total Interruptible & Joint	<u>5,509</u>	<u>(282)</u>	<u>5,227</u>	<u>(201)</u>	<u>5,026</u>
	<u>Transportation</u>					
24	Transportation	3,266	(182)	3,084	(87)	2,998
31	Total MERC-Minnesota	<u>2,943,864</u>	<u>17,385</u>	<u>2,961,249</u>	<u>6,921</u>	<u>2,968,170</u>

* Excludes fixed charge counts for Michigan taconites

Minnesota Energy Resources Corporation
Actual Year Fixed Charge Count Including Additional Meters
For the 12 Months Ending, December 31, 2021

	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Total	Average
NNG SALES														
[NNG] General Service Residential	189,161	186,313	186,346	187,847	187,353	188,083	189,839	187,803	187,632	188,025	188,138	190,082	2,256,622	188,052
[NNG] Farm Tap Residential	1,279	1,091	1,430	1,259	1,230	1,319	1,283	1,252	1,256	1,264	1,017	1,426	15,106	1,259
[NNG] General Service Class 1	7,535	7,382	7,407	7,550	7,451	7,459	7,470	7,396	7,392	7,486	7,621	7,781	89,929	7,494
[NNG] General Service Class 2	10,243	9,996	10,067	10,127	10,075	10,077	10,178	10,071	10,020	10,031	9,836	10,033	120,754	10,063
[NNG] General Service Class 3	52	49	49	49	51	49	49	53	49	61	52	52	614	51
[NNG] Farm Tap Class 1	106	89	124	105	93	117	103	107	105	118	90	139	1,294	108
[NNG] Farm Tap Class 2	229	214	237	220	226	232	229	221	235	219	194	232	2,687	224
[NNG] Farm Tap Class 3	4	3	5	4	4	3	5	3	5	2	2	2	42	4
[NNG] Interruptible Class 2	182	174	176	174	149	160	148	201	141	183	182	172	2,042	170
[NNG] Interruptible Class 3	49	49	50	50	46	51	39	62	48	44	53	52	593	49
[NNG] Agricultural Grain Dryer Class 1	64	57	58	62	59	56	53	66	59	71	92	86	783	65
[NNG] Agricultural Grain Dryer Class 2	92	82	97	93	80	81	82	99	118	75	68	53	1,020	85
[NNG] Agricultural Grain Dryer Class 3	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[NNG] Firm/Interruptible Class 2	2	2	2	2	1	2	3	2	1	1	1	1	20	2
[NNG] Electric Generation Class 1	8	10	9	10	9	7	7	12	8	9	10	8	106	9
[NNG] Electric Generation Class 2	1	1	1	1	-	-	-	-	-	-	-	-	4	0.33
CONSOLIDATED SALES														
[Cons] General Service Residential	32,070	31,642	31,461	31,822	31,697	31,871	32,547	31,635	31,704	31,725	31,760	32,376	382,310	31,859
[Cons] General Service Class 1	2,293	2,274	2,292	2,264	2,278	2,277	2,310	2,263	2,275	2,276	2,312	2,356	27,470	2,289
[Cons] General Service Class 2	3,223	3,145	3,155	3,199	3,162	3,168	3,240	3,168	3,166	3,155	3,141	3,177	38,099	3,175
[Cons] General Service Class 3	13	13	13	13	13	13	10	17	15	15	16	10	161	13
[Cons] Interruptible Class 2	46	46	48	46	44	39	39	43	49	44	44	53	541	45
[Cons] Interruptible Class 3	10	9	12	10	10	13	8	9	8	11	6	10	116	10
[Cons] Interruptible Class 4	1	3	1	2	3	1	3	2	2	2	2	2	24	2
[Cons] Agricultural Grain Dryer Class 1	6	6	6	7	6	6	5	7	6	6	8	14	83	7
[Cons] Agricultural Grain Dryer Class 2	9	8	9	9	8	11	9	9	11	9	6	9	108	9
[Cons] Firm/Interruptible Class 2	2	4	3	3	4	2	3	3	4	5	4	5	42	4
[Cons] Electric Generation Class 1	2	2	2	1	1	1	1	1	1	1	1	1	15	1
NNG TRANSPORT														
[NNG] Transport Class 2 (Firm)	33	32	32	32	32	32	32	31	33	32	35	37	393	33
[NNG] Transport Class 2 (Interruptible)	20	21	21	21	21	21	21	21	21	21	16	26	251	21
[NNG] Transport Class 3 (Firm)	28	28	28	28	28	28	28	27	29	28	20	30	330	28
[NNG] Transport Class 3 (Interruptible)	38	39	40	39	38	38	39	40	40	38	39	40	468	39
[NNG] Transport Class 4 (Firm)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[NNG] Transport Class 4 (Interruptible)	7	7	7	7	7	7	7	7	7	7	7	7	84	7
[NNG] Transport Class 5 (Interruptible)	3	3	3	3	3	3	3	3	3	3	3	3	36	3
[NNG] Transport Class 5 CIP Exempt (Firm)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[NNG] Transport Class 5 CIP Exempt (Interruptible)	12	12	12	12	12	12	12	12	12	12	12	12	144	12
[NNG] Firm/Interruptible Class 2 Transport	6	6	6	6	6	6	6	6	6	6	6	6	72	6
[NNG] Firm/Interruptible Class 3 Transport	19	19	19	19	19	19	19	19	19	19	19	19	228	19
[NNG] Firm/Interruptible Class 4 Transport	2	2	2	2	2	2	2	2	2	2	2	2	24	2
[NNG] Firm/Interruptible Class 5 Transport	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[NNG] Firm/Interruptible Class 5 Transport CIP Exempt	5	5	5	5	5	5	5	5	5	5	5	5	60	5
[NNG] Transport Electric Generation Class 2 (Interruptible)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[NNG] Transport Electric Generation Class 2 CIP Exempt (Firm)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[NNG] Transport Electric Generation Class 2 CIP Exempt (Interruptible)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[NNG] Transport Resale	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[NNG] Transport Flex (Cust A)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[NNG] Transport Flex (Cust F)	3	3	3	3	3	3	3	3	3	3	3	3	36	3
[NNG] Transport Flex (Cust G)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
CONSOLIDATED TRANSPORT														
[Cons] Transport Class 2 (Firm)	35	34	34	34	34	34	34	34	34	34	35	35	411	34
[Cons] Transport Class 2 (Interruptible)	7	7	7	7	7	7	7	7	7	7	7	7	84	7
[Cons] Transport Class 2 CIP Exempt (Firm)	-	-	-	-	-	-	-	-	-	-	1	1	2	0
[Cons] Transport Class 3 (Firm)	19	19	19	19	19	19	19	19	19	19	18	18	226	19
[Cons] Transport Class 3 (Interruptible)	14	14	14	14	14	14	13	15	14	14	13	14	167	14
[Cons] Transport Class 4 (Firm)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[Cons] Transport Class 4 (Interruptible)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[Cons] Transport Class 5 (Interruptible)	2	2	2	2	2	2	2	2	2	2	2	2	24	2
[Cons] Transport Class 5 CIP Exempt (Firm)	5	5	5	5	5	5	5	5	5	5	4	4	58	5
[Cons] Firm/Interruptible Class 3 Transport	2	2	2	2	2	2	2	2	2	2	2	2	24	2
[Cons] Firm/Interruptible Class 5 Transport CIP Exempt	1	1	1	1	1	1	1	1	1	1	1	1	12	1
Taconite Mines (Michigan)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
Total MERC	246,957	242,936	243,335	245,203	244,326	245,370	247,936	244,779	244,588	245,111	244,917	248,418	2,943,876	245,323
Michigan	1	1	1	1	1	1	1	1	1	1	1	1	12	1
Minnesota	246,956	242,935	243,334	245,202	244,325	245,369	247,935	244,778	244,587	245,110	244,916	248,417	2,943,864	245,322

Minnesota Energy Resources Corporation
Projected Fixed Charge Count Including Additional Meters
For the 12 Months Ending, December 31, 2022

	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	Total	Average
NNG SALES														
[NNG] General Service Residential	191,211	189,074	189,384	189,447	189,676	188,178	188,255	188,336	188,420	188,506	188,594	188,685	2,267,766	188,981
[NNG] Farm Tap Residential	1,073	1,251	1,305	1,240	1,351	1,240	1,240	1,240	1,240	1,240	1,240	1,240	14,900	1,242
[NNG] General Service Class 1	7,866	7,739	7,686	7,720	7,731	7,477	7,461	7,451	7,472	7,521	7,544	7,555	91,224	7,602
[NNG] General Service Class 2	9,995	10,041	9,909	9,928	9,930	10,040	10,018	10,005	10,033	10,099	10,130	10,145	120,273	10,023
[NNG] General Service Class 3	52	34	52	53	53	51	51	51	51	51	52	52	602	50
[NNG] Farm Tap Class 1	94	118	119	106	119	114	114	114	114	114	114	114	1,354	113
[NNG] Farm Tap Class 2	201	211	210	202	218	211	211	211	211	211	211	211	2,519	210
[NNG] Farm Tap Class 3	2	1	1	4	2	2	2	2	2	2	2	2	24	2
[NNG] Interruptible Class 2	166	163	167	157	170	163	162	163	161	160	160	158	1,950	162
[NNG] Interruptible Class 3	45	45	46	43	44	46	46	46	46	45	45	45	542	45
[NNG] Agricultural Grain Dryer Class 1	70	73	85	72	79	76	76	76	76	76	76	76	911	76
[NNG] Agricultural Grain Dryer Class 2	79	67	74	60	72	64	64	64	64	64	64	64	801	67
[NNG] Agricultural Grain Dryer Class 3	1	1	1	1	1	-	1	2	3	4	5	6	26	2
[NNG] Firm/Interruptible Class 2	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[NNG] Electric Generation Class 1	7	8	10	6	9	9	9	9	9	9	9	9	103	9
[NNG] Electric Generation Class 2	-	-	-	-	-	-	-	-	-	-	-	-	-	-
CONSOLIDATED SALES														
[Cons] General Service Residential	32,961	32,006	31,989	32,095	32,113	32,402	32,415	32,429	32,444	32,458	32,474	32,489	388,276	32,356
[Cons] General Service Class 1	2,387	2,345	2,299	2,352	2,348	2,284	2,279	2,276	2,282	2,297	2,304	2,308	27,762	2,313
[Cons] General Service Class 2	3,231	3,164	3,144	3,162	3,155	3,168	3,161	3,157	3,166	3,186	3,196	3,201	38,090	3,174
[Cons] General Service Class 3	8	11	11	11	11	13	13	13	13	13	13	14	146	12
[Cons] Interruptible Class 2	41	46	39	44	46	43	42	43	42	42	42	41	510	43
[Cons] Interruptible Class 3	11	9	9	9	9	8	8	8	8	8	8	8	101	8
[Cons] Interruptible Class 4	2	2	2	2	2	2	2	2	2	2	2	2	24	2
[Cons] Agricultural Grain Dryer Class 1	9	9	8	9	8	9	9	9	9	9	9	9	106	9
[Cons] Agricultural Grain Dryer Class 2	4	8	5	8	6	7	7	7	7	7	7	7	81	7
[Cons] Firm/Interruptible Class 2	4	4	4	4	4	4	4	4	4	4	4	4	48	4
[Cons] Electric Generation Class 1	1	1	1	1	1	1	1	1	1	1	1	1	12	1
NNG TRANSPORT														
[NNG] Transport Class 2 (Firm)	37	37	36	35	37	30	30	30	31	31	33	32	400	33
[NNG] Transport Class 2 (Interruptible)	21	21	21	21	21	19	19	19	20	20	21	21	243	20
[NNG] Transport Class 3 (Firm)	26	26	26	26	26	22	21	21	22	22	24	23	286	24
[NNG] Transport Class 3 (Interruptible)	39	40	41	39	40	36	35	35	36	37	39	38	455	38
[NNG] Transport Class 4 (Firm)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[NNG] Transport Class 4 (Interruptible)	7	7	7	7	7	6	6	6	7	7	7	7	81	7
[NNG] Transport Class 5 (Interruptible)	3	3	3	3	3	4	4	4	4	4	4	4	43	4
[NNG] Transport Class 5 CIP Exempt (Firm)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[NNG] Transport Class 5 CIP Exempt (Interruptible)	12	12	12	11	11	6	6	6	6	6	6	6	100	8
[NNG] Firm/Interruptible Class 2 Transport	6	6	6	6	6	6	5	5	6	6	6	6	70	6
[NNG] Firm/Interruptible Class 3 Transport	19	19	19	19	19	17	16	16	17	17	18	18	213	18
[NNG] Firm/Interruptible Class 4 Transport	2	2	2	2	2	2	2	2	2	2	2	2	23	2
[NNG] Firm/Interruptible Class 5 Transport	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[NNG] Firm/Interruptible Class 5 Transport CIP Exempt	5	5	5	5	5	5	5	5	5	5	5	5	60	5
[NNG] Transport Electric Generation Class 2 (Interruptible)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[NNG] Transport Electric Generation Class 2 CIP Exempt (Firm)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[NNG] Transport Electric Generation Class 2 CIP Exempt (Interruptible)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[NNG] Transport Resale	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[NNG] Transport Flex (Cust A)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[NNG] Transport Flex (Cust F)	3	3	3	3	3	3	3	3	3	3	3	3	36	3
[NNG] Transport Flex (Cust G)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
CONSOLIDATED TRANSPORT														
[Cons] Transport Class 2 (Firm)	35	35	35	35	35	32	31	31	32	32	34	33	400	33
[Cons] Transport Class 2 (Interruptible)	7	7	7	7	7	6	6	6	7	7	7	7	81	7
[Cons] Transport Class 2 CIP Exempt (Firm)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[Cons] Transport Class 3 (Firm)	18	18	18	18	18	16	15	15	16	16	17	16	201	17
[Cons] Transport Class 3 (Interruptible)	15	14	14	14	14	13	13	13	13	13	14	14	163	14
[Cons] Transport Class 4 (Firm)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[Cons] Transport Class 4 (Interruptible)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[Cons] Transport Class 5 (Interruptible)	2	2	2	2	2	2	2	2	2	2	2	2	17	2
[Cons] Transport Class 5 CIP Exempt (Firm)	4	4	4	4	4	2	2	2	2	2	2	2	34	3
[Cons] Firm/Interruptible Class 3 Transport	2	2	2	2	2	2	2	2	2	2	2	2	23	2
[Cons] Firm/Interruptible Class 5 Transport CIP Exempt	1	1	1	1	1	1	1	1	1	1	1	1	12	1
Taconite Mines (Michigan)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
Total MERC														
	249,799	246,711	246,840	247,011	247,434	245,854	245,889	245,955	246,122	246,377	246,567	246,700	2,961,261	246,772
Michigan														
	1	1	1	1	1	1	1	1	1	1	1	1	12	1
Minnesota														
	249,798	246,710	246,839	247,010	247,433	245,853	245,888	245,954	246,121	246,376	246,566	246,699	2,961,249	246,771

Minnesota Energy Resources Corporation
Proposed Test Year Fixed Charge Count Including Additional Meters
For the 12 Months Ending, December 31, 2023

	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Total	Average
NNG SALES														
[NNG] General Service Residential	188,778	188,868	188,959	189,054	189,148	189,243	189,336	189,430	189,522	189,613	189,703	189,791	2,271,446	189,287
[NNG] Farm Tap Residential	1,240	1,240	1,240	1,240	1,240	1,240	1,240	1,240	1,240	1,240	1,240	1,240	14,880	1,240
[NNG] General Service Class 1	7,563	7,558	7,550	7,538	7,525	7,514	7,500	7,491	7,513	7,562	7,586	7,598	90,499	7,542
[NNG] General Service Class 2	10,155	10,149	10,138	10,122	10,104	10,090	10,071	10,059	10,089	10,155	10,186	10,202	121,519	10,127
[NNG] General Service Class 3	52	52	52	51	51	51	51	51	51	52	52	52	618	51
[NNG] Farm Tap Class 1	114	114	114	114	114	114	114	114	114	114	114	114	1,368	114
[NNG] Farm Tap Class 2	211	211	211	211	211	211	211	211	211	211	211	211	2,532	211
[NNG] Farm Tap Class 3	2	2	2	2	2	2	2	2	2	2	2	2	24	2
[NNG] Interruptible Class 2	158	157	156	156	156	155	153	154	152	152	152	150	1,852	154
[NNG] Interruptible Class 3	45	44	44	44	44	44	44	44	43	43	43	43	525	44
[NNG] Agricultural Grain Dryer Class 1	76	76	76	76	76	76	76	76	76	76	76	76	912	76
[NNG] Agricultural Grain Dryer Class 2	64	64	64	64	64	64	64	64	64	64	64	64	768	64
[NNG] Agricultural Grain Dryer Class 3	-	-	-	-	-	-	-	-	-	-	-	-	-	-
[NNG] Firm/Interruptible Class 2	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[NNG] Electric Generation Class 1	9	9	9	9	9	9	9	9	9	9	9	9	108	9
[NNG] Electric Generation Class 2	-	-	-	-	-	-	-	-	-	-	-	-	-	-
CONSOLIDATED SALES														
[Cons] General Service Residential	32,505	32,521	32,536	32,553	32,569	32,585	32,601	32,618	32,633	32,649	32,664	32,680	391,115	32,593
[Cons] General Service Class 1	2,310	2,309	2,306	2,303	2,299	2,295	2,291	2,288	2,295	2,310	2,317	2,321	27,644	2,304
[Cons] General Service Class 2	3,204	3,202	3,199	3,193	3,188	3,183	3,177	3,174	3,183	3,204	3,214	3,219	38,340	3,195
[Cons] General Service Class 3	14	14	14	13	13	13	13	13	13	14	14	14	162	13
[Cons] Interruptible Class 2	41	41	41	41	41	41	40	40	40	40	40	39	484	40
[Cons] Interruptible Class 3	8	8	8	8	8	7	7	7	7	7	7	7	89	7
[Cons] Interruptible Class 4	2	2	2	2	2	2	2	2	2	2	2	2	24	2
[Cons] Agricultural Grain Dryer Class 1	9	9	9	9	9	9	9	9	9	9	9	9	108	9
[Cons] Agricultural Grain Dryer Class 2	7	7	7	7	7	7	7	7	7	7	7	7	84	7
[Cons] Firm/Interruptible Class 2	4	4	4	4	4	4	4	4	4	4	4	4	48	4
[Cons] Electric Generation Class 1	1	1	1	1	1	1	1	1	1	1	1	1	12	1
NNG TRANSPORT														
[NNG] Transport Class 2 (Firm)	32	32	31	33	32	31	31	31	31	32	34	33	383	32
[NNG] Transport Class 2 (Interruptible)	20	20	20	21	21	20	19	19	20	20	22	21	244	20
[NNG] Transport Class 3 (Firm)	23	23	22	23	23	22	22	22	23	23	24	24	274	23
[NNG] Transport Class 3 (Interruptible)	38	38	37	38	38	37	36	36	37	38	40	39	450	38
[NNG] Transport Class 4 (Firm)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[NNG] Transport Class 4 (Interruptible)	7	7	7	7	7	7	6	6	7	7	7	7	81	7
[NNG] Transport Class 5 (Interruptible)	4	4	4	4	4	4	4	4	4	4	4	4	48	4
[NNG] Transport Class 5 CIP Exempt (Firm)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[NNG] Transport Class 5 CIP Exempt (Interruptible)	6	6	6	6	6	6	6	6	6	6	6	6	72	6
[NNG] Firm/Interruptible Class 2 Transport	6	6	6	6	6	6	6	6	6	6	6	6	70	6
[NNG] Firm/Interruptible Class 3 Transport	17	17	17	18	18	17	17	17	17	17	18	18	208	17
[NNG] Firm/Interruptible Class 4 Transport	2	2	2	2	2	2	2	2	2	2	2	2	23	2
[NNG] Firm/Interruptible Class 5 Transport	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[NNG] Firm/Interruptible Class 5 Transport CIP Exempt	5	5	5	5	5	5	5	5	5	5	5	5	60	5
[NNG] Transport Electric Generation Class 2 (Interruptible)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[NNG] Transport Electric Generation Class 2 CIP Exempt (Firm)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[NNG] Transport Electric Generation Class 2 CIP Exempt (Interruptible)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[NNG] Transport Resale	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[NNG] Transport Flex (Cust A)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[NNG] Transport Flex (Cust F)	3	3	3	3	3	3	3	3	3	3	3	3	36	3
[NNG] Transport Flex (Cust G)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
CONSOLIDATED TRANSPORT														
[Cons] Transport Class 2 (Firm)	33	33	32	34	34	32	32	32	32	33	35	34	396	33
[Cons] Transport Class 2 (Interruptible)	7	7	7	7	7	7	6	6	7	7	7	7	81	7
[Cons] Transport Class 2 CIP Exempt (Firm)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[Cons] Transport Class 3 (Firm)	16	16	16	17	17	16	16	16	16	16	17	17	195	16
[Cons] Transport Class 3 (Interruptible)	14	14	13	14	14	13	13	13	13	14	14	14	162	14
[Cons] Transport Class 4 (Firm)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[Cons] Transport Class 4 (Interruptible)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[Cons] Transport Class 5 (Interruptible)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
[Cons] Transport Class 5 CIP Exempt (Firm)	2	2	2	2	2	2	2	2	2	2	2	2	24	2
[Cons] Firm/Interruptible Class 3 Transport	2	2	2	2	2	2	2	2	2	2	2	2	23	2
[Cons] Firm/Interruptible Class 5 Transport CIP Exempt	1	1	1	1	1	1	1	1	1	1	1	1	12	1
Taconite Mines (Michigan)	1	1	1	1	1	1	1	1	1	1	1	1	12	1
Total MERC	246,824	246,914	246,989	247,071	247,141	247,209	247,268	247,352	247,530	247,791	247,982	248,113	2,968,182	247,347
Michigan	1	1	1	1	1	1	1	1	1	1	1	1	12	1
Minnesota	246,823	246,913	246,988	247,070	247,140	247,208	247,267	247,351	247,529	247,790	247,981	248,112	2,968,170	247,346

Minnesota Energy Resources Corporation
Proposed Test Year Firm Sales for Firm/ Interruptible Customers
For the 12 Months Ending, December 31, 2023

<u>Line</u>	<u>Rate Class</u> (col. 1)	Firm/ Interruptible Firm Sales 2021 Total Annual Per Books (col. 2)	2022 Growth (col. 3)	Firm/ Interruptible Firm Sales 2022 Forecast (col. 4)	2023 Growth (col. 5)	Firm/ Interruptible Firm Sales 2023 Forecast (col. 6)
<u>Residential Rate</u>						
1	Residential	-	-	-	-	-
<u>C&I General Service Rate</u>						
6	Class 1	-	-	-	-	-
	Class 2	-	-	-	-	-
13	Class 3	-	-	-	-	-
14	Total C&I General Service	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>Interruptible & Joint</u>						
15	Interruptible	-	-	-	-	-
16	Joint	191,899	(8,202)	183,697	6,723	190,420
23	Total Interruptible & Joint	<u>191,899</u>	<u>(8,202)</u>	<u>183,697</u>	<u>6,723</u>	<u>190,420</u>
<u>Transportation</u>						
24	Transportation	43,495,892	(379,734)	43,116,158	(9,175)	43,106,983
31	Total MERC-Minnesota	<u>43,687,791</u>	<u>(387,936)</u>	<u>43,299,855</u>	<u>(2,452)</u>	<u>43,297,403</u>

Minnesota Energy Resources Corporation
Actual Year Firm Sales for Firm/ Interruptible Customers
For the 12 Months Ending, December 31, 2021

	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Total
NNG SALES													
[NNG] General Service Residential													-
[NNG] Farm Tap Residential													-
[NNG] General Service Class 1													-
[NNG] General Service Class 2													-
[NNG] General Service Class 3													-
[NNG] Farm Tap Class 1													-
[NNG] Farm Tap Class 2													-
[NNG] Farm Tap Class 3													-
[NNG] Interruptible Class 2													-
[NNG] Interruptible Class 3													-
[NNG] Agricultural Grain Dryer Class 1													-
[NNG] Agricultural Grain Dryer Class 2													-
[NNG] Agricultural Grain Dryer Class 3													-
[NNG] Firm/Interruptible Class 2	7,253	9,136	7,252	6,366	2,637	5,352	4,082	2,535	2,284	2,441	2,585	2,906	54,829
[NNG] Electric Generation Class 1													-
[NNG] Electric Generation Class 2													-
CONSOLIDATED SALES													
[Cons] General Service Residential													-
[Cons] General Service Class 1													-
[Cons] General Service Class 2													-
[Cons] General Service Class 3													-
[Cons] Interruptible Class 2													-
[Cons] Interruptible Class 3													-
[Cons] Interruptible Class 4													-
[Cons] Agricultural Grain Dryer Class 1													-
[Cons] Agricultural Grain Dryer Class 2													-
[Cons] Firm/Interruptible Class 2	17,905	17,126	16,563	12,691	13,250	3,657	3,229	3,003	4,221	7,126	14,902	23,396	137,070
[Cons] Electric Generation Class 1													-
NNG TRANSPORT													
[NNG] Transport Class 2 (Firm)													-
[NNG] Transport Class 2 (Interruptible)													-
[NNG] Transport Class 3 (Firm)													-
[NNG] Transport Class 3 (Interruptible)													-
[NNG] Transport Class 4 (Firm)													-
[NNG] Transport Class 4 (Interruptible)													-
[NNG] Transport Class 5 (Interruptible)													-
[NNG] Transport Class 5 CIP Exempt (Firm)													-
[NNG] Transport Class 5 CIP Exempt (Interruptible)													-
[NNG] Firm/Interruptible Class 2 Transport	4,216	4,210	4,210	4,210	4,210	4,210	4,210	4,210	4,210	4,210	4,210	4,210	50,526
[NNG] Firm/Interruptible Class 3 Transport	104,500	104,500	104,500	104,500	104,500	104,500	104,500	104,500	104,500	104,500	104,500	104,500	1,254,000
[NNG] Firm/Interruptible Class 4 Transport	191,500	191,500	191,500	191,500	191,500	191,500	191,500	191,500	191,500	191,500	191,500	191,500	2,298,000
[NNG] Firm/Interruptible Class 5 Transport	15,500	15,500	15,500	15,500	15,500	15,500	15,500	15,500	15,500	15,500	15,500	15,500	186,000
[NNG] Firm/Interruptible Class 5 Transport CIP Exempt	2,118,000	2,118,000	2,118,000	2,118,000	2,118,000	2,118,000	2,118,000	2,118,000	2,118,000	2,118,000	2,118,000	2,118,000	25,416,000
[NNG] Transport Electric Generation Class 2 (Interruptible)													-
[NNG] Transport Electric Generation Class 2 CIP Exempt (Firm)													-
[NNG] Transport Electric Generation Class 2 CIP Exempt (Interruptible)													-
[NNG] Transport Resale													-
[NNG] Transport Flex (Cust A)	429,500	427,135	418,000	481,500	442,000	447,500	368,000	441,000	468,500	468,500	512,000	494,500	5,398,135
[NNG] Transport Flex (Cust F)	254,911	251,974	216,688	218,635	222,526	253,130	319,698	239,232	179,295	247,453	209,199	213,091	2,825,833
[NNG] Transport Flex (Cust G)	93,512	100,519	105,867	76,675	73,782	65,818	73,212	43,869	47,627	54,564	52,958	70,995	859,398
CONSOLIDATED TRANSPORT													
[Cons] Transport Class 2 (Firm)													-
[Cons] Transport Class 2 (Interruptible)													-
[Cons] Transport Class 2 CIP Exempt (Firm)													-
[Cons] Transport Class 3 (Firm)													-
[Cons] Transport Class 3 (Interruptible)													-
[Cons] Transport Class 4 (Firm)													-
[Cons] Transport Class 4 (Interruptible)													-
[Cons] Transport Class 5 (Interruptible)													-
[Cons] Transport Class 5 CIP Exempt (Firm)													-
[Cons] Firm/Interruptible Class 3 Transport	11,000	11,000	11,000	11,000	11,000	11,000	11,000	11,000	11,000	11,000	11,000	11,000	132,000
[Cons] Firm/Interruptible Class 5 Transport CIP Exempt	423,000	423,000	423,000	423,000	423,000	423,000	423,000	423,000	423,000	423,000	423,000	423,000	5,076,000
Taconite Mines (Michigan)													
													-
Total MERC	3,670,797	3,673,601	3,632,080	3,663,578	3,621,905	3,643,168	3,635,931	3,597,350	3,569,637	3,647,794	3,659,354	3,672,598	43,687,791

Minnesota Energy Resources Corporation
Projected Firm Sales for Firm/ Interruptible Customers
For the 12 Months Ending, December 31, 2022

	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	Total
NNG SALES													
[NNG] General Service Residential													-
[NNG] Farm Tap Residential													-
[NNG] General Service Class 1													-
[NNG] General Service Class 2													-
[NNG] General Service Class 3													-
[NNG] Farm Tap Class 1													-
[NNG] Farm Tap Class 2													-
[NNG] Farm Tap Class 3													-
[NNG] Interruptible Class 2													-
[NNG] Interruptible Class 3													-
[NNG] Agricultural Grain Dryer Class 1													-
[NNG] Agricultural Grain Dryer Class 2													-
[NNG] Agricultural Grain Dryer Class 3													-
[NNG] Firm/Interruptible Class 2	3,181	2,648	2,767	2,582	2,378	4,649	5,269	4,454	3,196	1,616	1,702	2,389	36,830
[NNG] Electric Generation Class 1													-
[NNG] Electric Generation Class 2													-
CONSOLIDATED SALES													
[Cons] General Service Residential													-
[Cons] General Service Class 1													-
[Cons] General Service Class 2													-
[Cons] General Service Class 3													-
[Cons] Interruptible Class 2													-
[Cons] Interruptible Class 3													-
[Cons] Interruptible Class 4													-
[Cons] Agricultural Grain Dryer Class 1													-
[Cons] Agricultural Grain Dryer Class 2													-
[Cons] Firm/Interruptible Class 2	22,245	15,155	21,653	18,088	13,338	4,916	4,168	5,277	5,906	7,075	9,812	19,236	146,867
[Cons] Electric Generation Class 1													-
NNG TRANSPORT													
[NNG] Transport Class 2 (Firm)													-
[NNG] Transport Class 2 (Interruptible)													-
[NNG] Transport Class 3 (Firm)													-
[NNG] Transport Class 3 (Interruptible)													-
[NNG] Transport Class 4 (Firm)													-
[NNG] Transport Class 4 (Interruptible)													-
[NNG] Transport Class 5 (Interruptible)													-
[NNG] Transport Class 5 CIP Exempt (Firm)													-
[NNG] Transport Class 5 CIP Exempt (Interruptible)													-
[NNG] Firm/Interruptible Class 2 Transport	4,210	4,210	4,210	4,210	4,210	9,015	14,125	10,062	11,397	8,937	10,171	4,569	89,325
[NNG] Firm/Interruptible Class 3 Transport	104,500	104,500	104,500	104,500	104,500	120,033	150,881	156,322	154,805	198,472	195,693	163,909	1,662,616
[NNG] Firm/Interruptible Class 4 Transport	191,500	191,500	191,500	191,500	191,500	230,196	285,377	288,765	313,379	362,427	329,499	379,429	3,146,571
[NNG] Firm/Interruptible Class 5 Transport	15,500	15,500	15,500	15,500	15,500	14,300	16,086	13,223	13,176	13,563	19,765	16,204	183,818
[NNG] Firm/Interruptible Class 5 Transport CIP Exempt	2,118,000	2,118,000	2,118,000	2,118,000	2,118,000	2,021,220	2,017,613	2,036,595	1,925,961	2,179,005	2,013,943	1,929,099	24,713,438
[NNG] Transport Electric Generation Class 2 (Interruptible)													-
[NNG] Transport Electric Generation Class 2 CIP Exempt (Firm)													-
[NNG] Transport Electric Generation Class 2 CIP Exempt (Interruptible)													-
[NNG] Transport Resale													-
[NNG] Transport Flex (Cust A)	460,500	325,500	300,500	314,000	393,000	289,567	320,728	352,824	313,437	334,987	242,382	242,190	3,889,616
[NNG] Transport Flex (Cust F)	254,663	241,183	209,899	216,242	239,160	242,538	211,016	277,333	236,590	269,378	223,097	212,968	2,834,066
[NNG] Transport Flex (Cust G)	142,500	218,500	208,000	186,000	135,500	51,212	55,087	57,509	48,351	71,621	73,342	79,182	1,326,805
CONSOLIDATED TRANSPORT													
[Cons] Transport Class 2 (Firm)													-
[Cons] Transport Class 2 (Interruptible)													-
[Cons] Transport Class 2 CIP Exempt (Firm)													-
[Cons] Transport Class 3 (Firm)													-
[Cons] Transport Class 3 (Interruptible)													-
[Cons] Transport Class 4 (Firm)													-
[Cons] Transport Class 4 (Interruptible)													-
[Cons] Transport Class 5 (Interruptible)													-
[Cons] Transport Class 5 CIP Exempt (Firm)													-
[Cons] Firm/Interruptible Class 3 Transport	11,000	11,000	11,000	11,000	11,000	8,140	8,732	11,294	12,613	12,313	6,785	3,213	118,089
[Cons] Firm/Interruptible Class 5 Transport CIP Exempt	423,000	423,000	423,000	423,000	423,000	423,389	412,128	446,749	413,304	501,374	490,250	349,620	5,151,814
Taconite Mines (Michigan)	-	-	-	-	-	-	-	-	-	-	-	-	-
Total MERC	3,750,828	3,670,725	3,610,559	3,604,654	3,651,119	3,419,209	3,501,245	3,660,444	3,452,151	3,960,807	3,616,480	3,402,050	43,299,855

Minnesota Energy Resources Corporation
Proposed Test Year Firm Sales for Firm/ Interruptible Customers
For the 12 Months Ending, December 31, 2023

	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Total
NNG SALES													
[NNG] General Service Residential													-
[NNG] Farm Tap Residential													-
[NNG] General Service Class 1													-
[NNG] General Service Class 2													-
[NNG] General Service Class 3													-
[NNG] Farm Tap Class 1													-
[NNG] Farm Tap Class 2													-
[NNG] Farm Tap Class 3													-
[NNG] Interruptible Class 2													-
[NNG] Interruptible Class 3													-
[NNG] Agricultural Grain Dryer Class 1													-
[NNG] Agricultural Grain Dryer Class 2													-
[NNG] Agricultural Grain Dryer Class 3													-
[NNG] Firm/Interruptible Class 2	8,215	6,897	7,136	6,708	5,326	4,744	5,376	4,545	3,261	1,649	1,737	2,438	58,032
[NNG] Electric Generation Class 1													-
[NNG] Electric Generation Class 2													-
CONSOLIDATED SALES													
[Cons] General Service Residential													-
[Cons] General Service Class 1													-
[Cons] General Service Class 2													-
[Cons] General Service Class 3													-
[Cons] Interruptible Class 2													-
[Cons] Interruptible Class 3													-
[Cons] Interruptible Class 4													-
[Cons] Agricultural Grain Dryer Class 1													-
[Cons] Agricultural Grain Dryer Class 2													-
[Cons] Firm/Interruptible Class 2	11,032	11,032	11,032	11,032	11,032	11,032	11,032	11,032	11,032	11,032	11,032	11,032	132,388
[Cons] Electric Generation Class 1													-
NNG TRANSPORT													
[NNG] Transport Class 2 (Firm)													-
[NNG] Transport Class 2 (Interruptible)													-
[NNG] Transport Class 3 (Firm)													-
[NNG] Transport Class 3 (Interruptible)													-
[NNG] Transport Class 4 (Firm)													-
[NNG] Transport Class 4 (Interruptible)													-
[NNG] Transport Class 5 (Interruptible)													-
[NNG] Transport Class 5 CIP Exempt (Firm)													-
[NNG] Transport Class 5 CIP Exempt (Interruptible)													-
[NNG] Firm/Interruptible Class 2 Transport	7,627	4,593	3,600	3,565	4,084	9,705	14,926	10,484	11,770	9,179	10,430	4,686	94,649
[NNG] Firm/Interruptible Class 3 Transport	147,613	130,092	116,946	131,055	135,507	129,223	159,434	162,882	159,878	203,852	200,687	168,094	1,845,264
[NNG] Firm/Interruptible Class 4 Transport	265,965	209,494	211,097	218,756	240,595	247,821	301,554	300,883	323,647	372,250	337,909	293,324	3,323,294
[NNG] Firm/Interruptible Class 5 Transport	14,861	13,457	16,703	16,519	13,907	14,333	16,286	13,340	13,385	13,397	20,005	16,287	182,482
[NNG] Firm/Interruptible Class 5 Transport CIP Exempt	2,141,891	1,971,703	2,538,253	1,823,523	2,233,184	2,066,643	2,126,667	2,161,902	1,821,033	2,239,319	2,086,085	2,090,232	25,300,436
[NNG] Transport Electric Generation Class 2 (Interruptible)													-
[NNG] Transport Electric Generation Class 2 CIP Exempt (Firm)													-
[NNG] Transport Electric Generation Class 2 CIP Exempt (Interruptible)													-
[NNG] Transport Resale													-
[NNG] Transport Flex (Cust A)	285,025	227,620	216,196	286,044	218,791	289,567	320,728	352,824	313,437	334,987	242,382	242,190	3,329,793
[NNG] Transport Flex (Cust F)	264,493	235,809	221,205	176,200	212,529	235,614	225,912	253,033	229,820	263,498	219,367	215,041	2,752,520
[NNG] Transport Flex (Cust G)	114,098	109,509	90,376	70,119	56,125	47,736	37,721	47,214	49,181	66,432	82,021	93,021	863,553
CONSOLIDATED TRANSPORT													
[Cons] Transport Class 2 (Firm)													-
[Cons] Transport Class 2 (Interruptible)													-
[Cons] Transport Class 2 CIP Exempt (Firm)													-
[Cons] Transport Class 3 (Firm)													-
[Cons] Transport Class 3 (Interruptible)													-
[Cons] Transport Class 4 (Firm)													-
[Cons] Transport Class 4 (Interruptible)													-
[Cons] Transport Class 5 (Interruptible)													-
[Cons] Transport Class 5 CIP Exempt (Firm)													-
[Cons] Firm/Interruptible Class 3 Transport	3,594	3,855	2,745	3,199	3,623	8,764	9,227	11,768	13,026	12,647	6,958	3,295	82,701
[Cons] Firm/Interruptible Class 5 Transport CIP Exempt	540,494	437,824	455,442	366,516	322,242	422,483	440,397	486,520	389,935	505,646	554,966	409,825	5,332,289
Taconite Mines (Michigan)													-
Total MERC	3,804,910	3,361,885	3,890,732	3,113,237	3,456,945	3,487,664	3,669,260	3,816,428	3,339,405	4,033,889	3,773,579	3,549,468	43,297,403

Minnesota Jurisdiction Only

	Forecast Models	CCOSS	Rate Design
Sales (Firm and Interruptible)	875,588,723	875,588,723	875,588,723
Fixed Charge Counts	2,968,170	2,968,170	2,968,170
Revenues on Current Tariffs		\$ 406,983,975.35	\$ 406,983,975.52

*The Forecast Models are done inclusive of the Michigan Taconite Mines, but the associated values with those customers are excluded from the revenue deficiency.