



A Division of Montana-Dakota Utilities Co.

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July 1, 2025

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 East Seventh Place, Suite 350
St. Paul, MN 55101-2147

**Re: Docket No. G-004/M-25-71
Demand Entitlement Filing**

Dear Mr. Seuffert:

Great Plains Natural Gas Co. (Great Plains), a Division of Montana-Dakota Utilities Co. (Montana-Dakota), herewith electronically submits its Demand Entitlement Filing pursuant to Minnesota Rule 7825.2910, Subpart 2 for the 2025-2026 winter heating season.

In support of the filing, Great Plains has attached the following exhibits:

Exhibit A – Design Day Capacity Requirements
Exhibit B – Capacity Portfolio and Capacity Release
Exhibit C – Rate Impacts
Exhibit D – Demand Entitlement Analysis

Design Day Capacity Requirements

As shown in Exhibit A, Great Plains has calculated a design day requirement for 31,892 dk/day of firm transportation capacity. This requirement consists of 14,209 dk/day capacity for city gate delivery via Viking Gas Transmission (VGT) and 17,683 dk/day capacity for city gate delivery via Northern Natural Gas (NNG).

In compliance with the determinations made in Docket No. G-004/M-03-303 and its Agreement with the Department, Great Plains performed a regression analysis using 36 months of history in its design day methodology. This produces an estimate of the design day demand requirement and supports the required pipeline capacity levels.

Great Plains has a long history of successfully serving its customers' gas requirements in a safe, reliable, and economical fashion. The Company believes its regressions are accurate, can be relied upon for forecasting demand requirements, and the resulting design day peak capacity requirements are reasonable. Great Plains serves

approximately 22,400 Minnesota customers and is intimately familiar with its customer's gas usage, conservation, and growth characteristics.

Due to the different weather patterns in its service area, Great Plains performed individual regression analyses for Marshall, Crookston, and Fergus Falls, Minnesota. The calculations are consistent with the design day methodologies accepted by the Commission in the most recent Docket¹.

Great Plains continues to monitor its data and regression models for the presence of autocorrelation and whether it has statistical significance to the projected design day requirement, as agreed to in Docket No. G-004/M-17-521. While studies indicate autocorrelation is present, its effects are immaterial and Great Plains continues to support its current methodology, as previously approved, as the modeling produces reasonable results.

Capacity Portfolio

As shown in Exhibit B, Great Plains is proposing no change from its currently effective Demand Entitlement Quantity. Great Plains plans to release 8,000 dk per day on VGT capacity as described below.

Great Plains' firm transportation service portfolio includes a total maximum delivery quantity (MDQ) of 57,436 dk/day. This includes 42,436 dk/day that may be delivered directly to Great Plains' city gates and 15,000 dk/day of supplemental capacity used to transport from supply market to demand market².

VGT

Great Plains holds 23,291 dk/day of delivery capacity on VGT to serve the city gates of Crookston, MN and communities located on Great Plains' transmission lateral located between Vergas, MN and Breckenridge, MN. These contracts consist of 21,291 dk/day of annual capacity and 2,000 dk/day of seasonal (November-March) capacity.

NNG

Great Plains' holds 19,145 dk/day of delivery capacity on NNG to serve the 13 communities in Southwest Minnesota. These contracts consist of 13,945 dk/day of annual capacity and 5,200 dk/day of seasonal (November-March) capacity.

¹ Docket No. G-004/M-24-234.

² Supplemental capacity transports natural gas from the Northern Border Pipeline/NNG pipeline interconnect at Ventura to the NNG/VGT interconnect at Chisago. Any deliveries made against these contracts must simultaneously be received against a VGT agreement.

Great Plains' holds 15,000 dk/day of the previously described supplemental capacity Southwest Minnesota. These contracts consist of 13,000 dk/day of annual capacity and 2,000 dk/day of seasonal (November-March) capacity.

The arrangement of supplying VGT city gates from NNG market locations provides a robust, reliable, and diverse source of natural gas for Great Plains' customers. The proposed portfolio equitably and evenly distributes capacity such that city gates interconnecting with either available transmission company have appropriate levels of transmission capacity.

Capacity Release

In this current docket, Great Plains proposes to release 8,000 dk per day of VGT capacity for the 2025-2026 heating season, as shown in Exhibit B. Great Plains does not intend to release any capacity on NNG, recognizing that load has grown such that the reserve margin is 7.98 percent. The Company will update the Commission regarding the final capacity released in the supplemental demand entitlement filing (supplemental filing) on October 31, 2025.

Contracts for release have been strategically selected to ensure Great Plains can maintain diversity of supply sources throughout the heating season. Great Plains targets equal base and spot purchase exposure to Emerson, Ventura, and Demarc indexes.

Great Plains successfully released VGT capacity during the 2024-2025 heating season. The amount released changed from month-to-month due to dynamic needs of the now complete Wahpeton Expansion Project³. Last heating season's release earned a total credit of \$745,345.

At this time, Great Plains has not encountered impediments to efforts being made to release the excess capacity on VGT. Great Plains will fully explain any impediments it may encounter in the supplemental filing. Great Plains will also consider additional capacity release opportunities during non-peak heating seasons seeking to further minimize customer demand costs.

Rate Impacts

The single largest rate impact for this upcoming heating season will likely be NNG's recently announced rate case⁴. NNG seeks recovery of costs incurred from asset modernization efforts.

³ FERC Docket No. CP22-466.

⁴ NNG filed on July 1, 2025. Rates effective January 1, 2026. Great Plains will update with known changes in subsequent filings.

Table 1: Proposed Demand Costs

Interstate Pipelines				
	Dk/Day	Rates	Months	Demand Cost
<u>Viking Firm</u>				
FT-A - Zone 1-1 (Cat. 3)	8,000	\$5.6200	12	\$539,520
FT-A - Zone 1-1 (Cat. 3)	5,000	5.6200	12	337,200
FT-A - Seasonal (Cat. 3)	2,000	5.6200	5	56,200
FT-A - Zone 1-1 (Cat. 3)	5,000	5.6200	12	337,200
FT-A - Zone 1-1 (Cat. 3)	3,291	5.6200	12	221,945
FT-A - Capacity Release	(8,000)	6.3250	12	(607,200)
<u>Northern Natural Firm</u>				
TFX - Summer	13,000	\$9.6760	7	\$880,516
TFX - Winter	13,000	25.7990	5	1,676,935
TFX Seasonal (November - March)	2,000	25.7990	5	257,990
TF12 Base - Summer	5,703	9.6760	7	386,276
TF12 Base - Winter	5,703	17.4170	5	496,646
TF12 Variable - Summer	5,242	9.6760	7	355,051
TF12 Variable - Winter	5,242	23.6090	5	618,792
TFX - Winter	7,200	25.7990	5	928,764
TFX - Annual (Summer Rate)	3,000	9.6760	7	203,196
TFX - Annual (Winter Rate)	1,000	25.7990	5	128,995
FDD-1 Reservation	4,640	3.2345	12	180,097
Interruptible Demand Credit				(\$356,006)
Total Demand Charges				\$6,642,117

Pursuant to NNG's FERC tariff, NNG adjusts the MDQ associated with the TF12 Base and TF12 Variable effective November 1st of each year, based on the amount of capacity used during the preceding May through September period. Currently, the adjustment is pending; however, the change is typically insignificant. The change in the TF12 Base and TF12 Variable will be available by November 1, 2025, and Great Plains will provide a report to the Commission regarding the amount of the TF12 Base and TF12 Variable in place for the 2025-2026 heating season at that time.

Exhibit C shows the impact to customers due to the capacity changes discussed above. There is an increase of 46.5 percent in the demand component cost for residential and firm general customers based on the proposed capacity levels and current pricing from the rates in effect in July 2025.

The total customer impact of the updated demand profile compared to rates effective July 2025 is an increase of \$0.7505 per dk. This increase in the proposed demand cost of gas per dk is primarily due to the change in the proposed capacity releases on the Viking contracts. Please see Table 2 below for the annual rate impacts reflecting the capacity and prices noted in Table 1 above.

Table 2: Proposed Demand Cost Impacts

Filing Date	Residential Customer (81.2 dk)	Total Change Residential (%)	Firm General Customer (436.0 dk)	Total Change Firm General (%)
July 1, 2025	\$60.94	8.7	\$327.22	9.3

Demand Entitlement Analysis

Exhibit D reflects the upcoming 2025-2026 heating season for the design day requirement, total entitlement and peak day design, and entitlement and firm send out per customer.

Ordered Responses

MN PUC Ordered Requirements to include in the 2025-2026 DEQ filing:

Orders from Docket No. G-004/M-22-310/ Docket No. G-004/M-23-262
Referring to New VGT FT-A 10-year contract⁵

1. Provide updates on Customer #4.

Response: Customer #4, as referenced in the noted dockets, has elected to relocate outside of Minnesota.

2. Given excess capacity explain in detail:
 - a. Whether the Company can return this VGT-FT-A 3,291 dk/day capacity back with no penalty.

Response: No, the Company cannot turn back this capacity without penalty.

- b. Whether the Company cannot rollover and not renew some of the expiring 2027 FT-A capacity.

Response: Great Plains could choose to forego the renewal of any expiring capacity in the future.

- c. Whether the Company can decrease its excess capacity.

Response: Great Plains does decrease its excess transportation capacity via capacity release mechanisms offered by VGT. This practice has proven successful for several years.

⁵ AF0505 – Effective November 1, 2022 through October 31, 2032.

- d. How much of the capacity has been utilized to take advantage of the price differentials between Emerson and Ventura between November 1, 2022 and demand entitlement filings for the 2025-2026 heating season.

Response: Records show that a total of 524,285 dk has been scheduled using contract AF0505 since November 1, 2022. The coinciding Emerson purchases may otherwise have been executed at Ventura.

- e. How much delivery capacity on NNG has been reallocated to NNG connected communities because of using the new VGT FT-A contract between November 1, 2022, to the demand entitlement filings for the 2025-2026 heat season.

Response: None of the “supplemental” capacity has been reallocated to become NNG delivery since November 1, 2022. NNG quoted the cost to be approximately \$5.3 million to allow for such reallocation. This cost is unduly prohibitive at this time.

Orders from Docket No. G-004/M-24-234 Decision Options on May 15th Agenda meeting.

Referring to New VGT FT-A 10-year contract⁶

1. Require Great Plains to provide the following information for the 5,000 dk/day contract
 - a. Whether the company can turn the VGT-FT-A 5,000 dk/day capacity back with no penalty, or whether it will incur penalties from Viking.

Response: No, the Company cannot turn back this capacity without penalty.

- b. Whether the Company cannot rollover and not renew some of the expiring 2027 FT-A capacity.

Response: Great Plains could choose to forego the renewal of any expiring capacity in the future.

- c. Whether the Company can decrease its excess capacity.

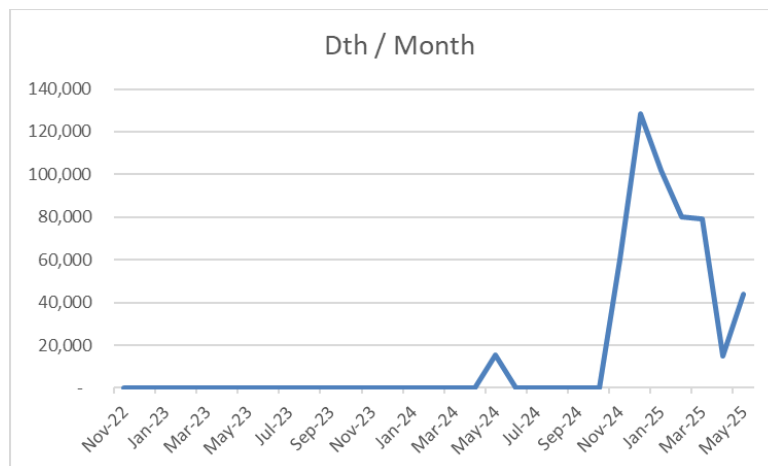
Response: Great Plains does decrease its excess transportation capacity via capacity release mechanisms offered by VGT. This practice has proven successful for several years.

⁶ AF0339 – Effective November 1, 2018 through October 31, 2023, renewed effective November 1, 2023 through October 31, 2028.

Orders from Docket No. G-004/M-21-135 and 21-235.

1. Require Great Plains in future demand entitlement filings to provide compliance information with Commission February 17, 2023 Order, Order Point 9, Docket No. 21-135 and 21-235. The February 17, 2023 Order established the following requirement for demand entitlement filings in Order Point 9:
 - a. In future contract demand entitlement filings, the gas utilities in this docket shall discuss how changes to their pipeline capacity affect their supply diversity and, if pipeline capacity comes at a cost premium but increases supply diversity, provide a meaningful cost/benefit discussion of the tradeoff, including a comparison with the least-cost capacity option.

Response: Pursuant to proceedings, hearings, and filings, Great Plains maintains a regionally diverse portfolio making nearly equal purchases from all three of its major trading locations. With that in mind, Great Plains has increased its monthly use of VGT capacity. For example, the following table displays use of AF0505 since November 2022.



This increase of utilization does not strictly relate to either base or spot purchases. It does, however, demonstrate that Great Plains recognizes that opportunities for less expensive supply can be found at Emerson versus other locations.

Summary

During the 2024-2025 heating season natural gas prices were generally stable and consistent with historical norms. Great Plains continues to see interest in natural gas throughout its service territory and anticipates additional growth of this clean burning fuel. Great Plains will continue to monitor customer growth and related changes in demand, as well as any effects of conservation.

If you have any questions regarding this study, please contact me at (701) 222-7855, or Kristin Stastny at (612) 977-8656.

Sincerely,

/s/ Travis R. Jacobson

Travis R. Jacobson
Vice President Regulatory Affairs

cc: Kristin Stastny

**GREAT PLAINS NATURAL GAS CO.
DEMAND ENTITLEMENT FILING
DESIGN DAY - HEATING SEASON
EFFECTIVE NOVEMBER 1, 2025**

	Customer Factors 1/			Design HDD 2/	Customers 3/	Projected Customers 4/	Peak/ Customer	Projected Peak	L&UA 5/	Projected	Proposed Capacity	Reserve
	dk/Day	dk/DD	RSqr					Day (dk)		Design		
<u>Viking Firm</u>												
Crookston	0.04942	0.01438	0.99435	96	2,663	2,670	1.42990	3,809	27	3,836		
North 4	0.05031	0.01451	0.99486	91	7,507	7,536	1.37072	10,301	72	10,373		
Total					10,170	10,206		14,110	99	14,209		
Northern Natural Firm	0.04917	0.01672	0.99600	83	12,224	12,233	1.43693	17,560	123	17,683		
Grand Total					22,394	22,439		31,670	222	31,892	34,436	7.98%

1/ Use per customer factors based on regression analysis for the 36 months ending March 2025.

2/ Design Heating Degree Days Base 60 degrees F.

3/ Reflects monthly average for December 2024 - February 2025.

4/ Customer growth is based on regression analysis for the 36 months ending March 2025 with composite growth rates of: Crookston = 0.27%, North = 0.39%, and South = 0.07%.

5/ Lost and Unaccounted for Gas percentage of 0.7%.

**GREAT PLAINS NATURAL GAS CO.
DEMAND ENTITLEMENT FILING
DEMAND PROFILE
EFFECTIVE NOVEMBER 1, 2025**

<u>Demand Profile (dk)</u>	<u>Authorized Amount</u>	<u>Proposed Change</u>	<u>Proposed Amount</u>	<u>Contract Length</u>	<u>Expiration Date</u>
<u>Viking</u>					
FT-A - Zone 1-1 (Cat. 3)	8,000	0	8,000	5 years	10/31/2027
FT-A - Zone 1-1 (Cat. 3)	5,000	0	5,000	5 years	10/31/2027
FT-A - Seasonal (Cat. 3)	2,000	0	2,000	5 years	10/31/2027
FT-A - Zone 1-1 (Cat. 3)	5,000	0	5,000	5 years	10/31/2028
FT-A - Zone 1-1 (Cat. 3)	3,291	0	3,291	10 years	10/31/2032
FT-A - Capacity Release	(8,000)	0	(8,000)	12 months	10/31/2026
Total	15,291	0	15,291		
<u>Northern Natural</u>					
TF12 Base (Summer and Winter)	5,703	0	5,703	5 years	10/31/2029
TF12 Variable (Summer and Winter)	5,242	0	5,242	5 years	10/31/2029
TFX Seasonal (November - March)	5,200	0	5,200	5 years	10/31/2026
TFX (Annual)	2,000	0	2,000	5 years	10/31/2026
TFX (Annual)	1,000	0	1,000	6 years	3/31/2030
Total	19,145	0	19,145		
Demand Profile Total	34,436	0	34,436		
<u>Supplemental Capacity</u>					
TFX Seasonal (November - March)	2,000	0	2,000	5 years	10/31/2026
TFX (Annual)	13,000	0	13,000	5 years	3/31/2029
Total	15,000	0	15,000		
Total Transmission Capacity	49,436	0	49,436		
<u>Storage</u>					
FDD-1 Reservation	4,640	0	4,640	4 years	5/31/2028
Heating Season Total Capacity:	34,436	0	34,436		
Non-Heating Season Total Capacity:	35,236	0	35,236		
Forecasted Heating Season Design Day:	31,678	214	31,892		
Estimated Non-Heating Season Design Day:	17,401	99	17,500		
Heating Season Capacity: Surplus/(Shortage)	2,758	(214)	2,544		
Non-Heating Season Capacity: Surplus/(Shortage)	17,835	(99)	17,736		

**GREAT PLAINS NATURAL GAS CO.
DEMAND ENTITLEMENT FILING
3 YEAR DEMAND PROFILE**

2023-2024 Heating Season G004/M-23-262	Quantity (dk)	2024-2025 Heating Season G004/M-24-234	Quantity (dk)	2025-2026 Heating Season G004/M-25-71	Quantity (dk)	Difference
FT-A (Cat. 3) (12 months)	8,000	FT-A (Cat. 3) (12 months)	8,000	FT-A (Cat. 3) (12 months)	8,000	0
FT-A (Cat. 3) (12 months)	10,000	FT-A (Cat. 3) (12 months)	10,000	FT-A (Cat. 3) (12 months)	10,000	0
FT-A (Cat. 3) (November - March)	2,000	FT-A (Cat. 3) (November - March)	2,000	FT-A (Cat. 3) (November - March)	2,000	0
FT-A (Cat. 3) (12 months)	3,291	FT-A (Cat. 3) (12 months)	3,291	FT-A (Cat. 3) (12 months)	3,291	0
FT-A Capacity Release	(4,291)	FT-A Capacity Release	(8,000)	FT-A Capacity Release	(8,000)	0
TFX (12 months) 1/	13,000	TFX (12 months) 1/	13,000	TFX (12 months) 1/	13,000	0
TFX (November - March) 1/	2,000	TFX (November - March) 1/	2,000	TFX (November - March) 1/	2,000	0
TF12 Base	3,531	TF12 Base	5,703	TF12 Base	5,703	0
TF12 Variable	4,004	TF12 Variable	5,242	TF12 Variable	5,242	0
TF5 (November- March)	3,410	TF5 (November- March)	0	TF5 (November- March)	0	0
TFX (November - March)	5,200	TFX (November - March)	5,200	TFX (November - March)	5,200	0
TFX (Annual)	2,000	TFX (Annual)	2,000	TFX (Annual)	2,000	0
TFX (Annual)	1,000	TFX (Annual)	1,000	TFX (Annual)	1,000	0
FDD-1 Reservation 1/	4,640	FDD-1 Reservation 1/	4,640	FDD-1 Reservation 1/	4,640	0
Heating Season Total Capacity	38,145	Heating Season Total Capacity	34,436	Heating Season Total Capacity	34,436	0
Non-Heating Season Total Capacity	31,826	Non-Heating Season Total Capacity	35,236	Non-Heating Season Total Capacity	35,236	0
Total Entitlement	38,145	Total Entitlement	34,436	Total Entitlement	34,436	0
Total Annual Transportation	31,826	Total Annual Transportation	35,236	Total Annual Transportation	35,236	0
Total Season Transportation	6,319	Total Season Transportation	(800)	Total Season Transportation	(800)	0
Percent TF-5	31.16%	Percent TF-5	0.00%	Percent TF-5	0.00%	0.00%
Total Percent Seasonal	16.57%	Total Percent Seasonal	-2.32%	Total Percent Seasonal	-2.32%	0.00%

1/ Does not impact demand profile.

GREAT PLAINS NATURAL GAS CO.
DEMAND ENTITLEMENT FILING
RATE EFFECT OF PROPOSED DEMAND - NOVEMBER 1, 2025

Exhibit C
Page 1 of 1

	Last Rate Case 1/	Last Demand Change 2/	Current Rates 3/	Proposed 4/	% Change from		Change from
					Last Rate Case	Last Demand Change	Current Rates
							Current Rates
Residential Gas Service							
Commodity Cost of Gas	\$2.23370	\$3.28800	\$3.16110	\$3.16110	41.5%	-3.9%	0.0%
GCR 5/	(0.06280)	0.72300	0.72300	0.72300	-1251.3%	0.0%	0.0%
Demand Cost of Gas	1.45680	2.34260	1.61330	2.36380	62.3%	0.9%	46.5%
Commodity Margin 1/	3.01710	3.01710	3.01710	3.01710	0.0%	0.0%	0.0%
CCRA 6/	(0.05970)	0.02020	0.02020	0.02020	-133.8%	0.0%	0.0%
GAP 7/	0.02295	0.05218	0.05218	0.05218	127.4%	0.0%	0.0%
GUIC 8/	0.30410	0.46420	0.46420	0.46420	52.6%	0.0%	0.0%
RDM and MSC 9/	(0.31120)	(0.49220)	(0.40050)	(0.40050)	28.7%	-18.6%	0.0%
Total Rate	\$6.60095	\$9.41508	\$8.65058	\$9.40108	42.4%	-0.1%	8.7%
Average Annual Usage (dk)	81.2	81.2	81.2	81.2			
Average Annual Cost of Gas	\$536.00	\$764.50	\$702.43	\$763.37	42.4%	-0.1%	8.7%
							\$60.94
Firm General Service							
Commodity Cost of Gas	\$2.23370	\$3.28800	\$3.16110	\$3.16110	41.5%	-3.9%	0.0%
GCR 5/	(0.06280)	0.72300	0.72300	0.72300	-1251.3%	0.0%	0.0%
Demand Cost of Gas	1.45680	2.34260	1.61330	2.36380	62.3%	0.9%	46.5%
Commodity Margin 1/	2.46850	2.46850	2.46850	2.46850	0.0%	0.0%	0.0%
CCRA 6/	(0.05970)	0.02020	0.02020	0.02020	-133.8%	0.0%	0.0%
GAP 7/	0.02295	0.05218	0.05218	0.05218	127.4%	0.0%	0.0%
GUIC 8/	0.18030	0.33660	0.33660	0.33660	86.7%	0.0%	0.0%
RDM and MSC 9/	(0.19810)	(0.35340)	(0.28050)	(0.28050)	41.6%	-20.6%	0.0%
Total Rate	\$6.04165	\$8.87768	\$8.09438	\$8.84488	46.4%	-0.4%	9.3%
Average Annual Usage (dk)	436.0	436.0	436.0	436.0			
Average Annual Cost of Gas	\$2,634.16	\$3,870.67	\$3,529.15	\$3,856.37	46.4%	-0.4%	9.3%
							\$327.22
Customer Class							
	Commodity Change		Demand Change		Total Change		Avg. Annual
	(\$/dk)	(Percent)	(\$/dk)	(Percent)	(\$/dk)	(Percent)	Bill Change
Residential Gas Service	\$0.0000	0.0%	\$0.7505	46.5%	\$0.7505	8.7%	\$60.94
Firm General Service	0.0000	0.0%	0.7505	46.5%	0.7505	9.3%	327.22

1/ Effective with service rendered on and after April 1, 2021 in Docket No. G004/GR-19-511.

2/ Demand in Docket No. G004/M-24-234, effective March 12, 2025.

3/ Most recently filed PGA: July 2025.

4/ Includes seasonal capacity release of 8,000 dk and Minnesota normalized volumes.

5/ Effective with service rendered on and after September 1, 2024 in Docket No. G004/AA-24-301.

6/ Current rates effective with service rendered on and after December 1, 2024 in Docket No. G004/M-24-44. Proposed Rates effective with service rendered on and after November 1, 2025, in Docket No. G004-M-25-71.

7/ Effective with service rendered on and after September 1, 2024 in Docket No. G004/M-24-37.

8/ Effective with service rendered on and after October 1, 2024 in Docket No. G004/M-24-170.

9/ Effective with service rendered on and after July 1, 2025, the Revenue Decoupling Mechanism rates only include the MSC component and is now identified on customers' bills as Margin Sharing Credit. - Docket No. G004/M-25-231.

**GREAT PLAINS NATURAL GAS CO.
DEMAND ENTITLEMENT FILING
DEMAND ENTITLEMENT ANALYSIS
MINNESOTA**

Heating Season	Number of Firm Customers			Design Day Requirement			Total Entitlement + Storage + Peak Shaving			
	(1) Number of Customers	(2) Change From Previous Year	(3) % Change From Previous Year	(4) Design Day (dk)	(5) Change From Previous Year	(6) % Change From Previous Year	(7) Total Entitlement (dk)	(8) Change From Previous Year	(9) % Change From Previous Year	(10) % of Reserve Margin [(7)-(4)]/(4)
2025-2026	22,439	109	0.49%	31,892	214	0.68%	34,436	291	0.85%	7.98%
2024-2025	22,330			31,678			34,145			7.79%
Annual Average			<u>0.49%</u>			<u>0.68%</u>			<u>0.85%</u>	<u>7.89%</u>

Heating Season	Firm Peak Day Sendout			(14) Excess Per Customer [(7)-(4)]/(1)	(15) Design Day per Customer (4)/(1)	(16) Entitlement per Customer (7)/(1)	(17) Peak Day Sendout per Customer (11)/(1)
	(11) Firm Peak Day Sendout (dk)	(12) Change From Previous Year	(13) % Change From Previous Year				
2025-2026				0.1134	1.4213	1.5346	
2024-2025	29,636			0.1105	1.4186	1.5291	1.3272
Annual Average			<u>0.00%</u>	<u>0.1120</u>	<u>1.4200</u>	<u>1.5319</u>	<u>1.3272</u>