



1900 Cardinal Lane | P.O. Box 798
Faribault, MN 55021
Toll Free: (888) 931-3411
Fax (507) 665-2588
www.greatermngas.com

March 31, 2020

VIA ELECTRONIC FILING

Mr. William Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Gas Affordability Program Annual Report for 2019
Docket No. _____

Dear Mr. Seuffert:

Attached hereto, please find Greater Minnesota Gas, Inc.'s Gas Affordability Program Annual Report for 2019 for filing in a new docket.

All individuals identified on the attached service list have been electronically served with the same.

Thank you for your assistance. Please do not hesitate to contact me should you have any questions or concerns or if you require additional information. My direct dial number is (507) 209-2110 and my email address is kanderson@greatermngas.com.

Sincerely,

GREATER MINNESOTA GAS, INC.

/s/
Kristine A. Anderson
Corporate Attorney

Enclosure

cc: Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._GAP Service List
Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._GAP Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._GAP Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._GAP Service List
Brian	Gardow	bgardow@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._GAP Service List
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._GAP Service List
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._GAP Service List
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._GAP Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._GAP Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._GAP Service List

**STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

Katie Sieben
Valerie Means
Matt Schuerger
Joseph Sullivan
John Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

Docket No. _____

Greater Minnesota Gas, Inc.'s
Gas Affordability Program
Annual Report for 2019

SUMMARY OF FILING

Please take notice that on March 31, 2020, Greater Minnesota Gas, Inc. ("GMG") filed the annual report for its gas affordability program with the Minnesota Public Utilities Commission. The filing does not contain any proposed rate impact.

Dated: March 31, 2020

/s/ Kristine A. Anderson
Kristine A. Anderson
Corporate Attorney
Greater Minnesota Gas, Inc.
1900 Cardinal Lane
P.O. Box 798
Phone: 888-931-3411

STATE OF MINNESOTA

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie Sieben
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MPUC Docket No. _____

**Greater Minnesota Gas, Inc.’s
Gas Affordability Program
Annual Report for 2019**

**ANNUAL GAS
AFFORDABILITY PROGRAM
REPORT FOR 2019**

Greater Minnesota Gas, Inc. (“GMG”) hereby submits its Annual Gas Affordability Program (“GAP”) Report for the period ending December 31, 2019. GMG previously provided its annual GAP reports subject to modified reporting requirements which applied through the Annual Report for 2015. During 2015, the Minnesota Public Utilities Commission (“Commission”) approved a change to GMG’s GAP and its reporting requirements. This marks GMG’s fourth annual report incorporating the revised reporting requirements. GMG partnered with the Energy Cents Coalition (“ECC”) as a third-party administrator to assist with its GAP; and, as a result GMG’s currently operating GAP and reporting requirements are more closely aligned with the programs of other natural gas providers. Pursuant to the Commission’s November 26, 2014 Order, GMG submits this Annual Report as a miscellaneous tariff filing in a new docket.

SUMMARY OF FILING

Pursuant to Minnesota Rule Part 7829.1300, Subpart 1, a one-paragraph summary of this filing, sufficient to apprise potentially interested parties of its nature and general content, accompanies this filing.

SERVICE ON REQUIRED AND INTERESTED PARTIES

Pursuant to Minnesota Rule Part 7829.1300, Subpart 2, GMG served a copy of this Report on the Residential Utilities Division of the Office of the Attorney General. Pursuant to Minnesota Rule Part 7825.2840, GMG served the Summary of Filing on all parties reflected on the accompanying Certificate of Service and Service List.

GENERAL FILING INFORMATION

Pursuant to Minnesota Rule Part 7829.1300, the following specific content is provided:

A. Name, Address and Telephone Number of the Utility

Greater Minnesota Gas, Inc.
1900 Cardinal Lane
P.O. Box 798
Faribault, Minnesota 55021
Telephone: (888) 931-3411

B. Name, Address and Telephone Number of the Attorney for Utility

Kristine A. Anderson
Corporate Attorney
Greater Minnesota Gas, Inc.
1900 Cardinal Lane
P.O. Box 798
Faribault, Minnesota 55021
Phone: 888-931-3411

C. Date of Filing and Proposed Effective Date of Rate Change

Date Filed: March 31, 2020
Proposed Effective Date: N/A; filing does not include a rate change

D. Statute Controlling Time Frame for Processing Filing

Greater Minnesota Gas, Inc. is unaware of any statute that controls the time frame for processing this filing by the Commission.

E. Utility Employee Responsible for this Filing (and Signature):

/s/ Kristine A. Anderson
Kristine A. Anderson, Esq.
Corporate Attorney

PROGRAM BACKGROUND

GMG's Gas Affordability Program is available to its residential customers who qualify for the Low Income Home Energy Assistance Program ("LIHEAP"), stipulate to a defined monthly payment plan, and make timely payments pursuant to the schedule. GMG's GAP was developed to serve qualified low-income residential natural gas customers by implementing an affordability-based bill credit and an arrearage forgiveness credit for those participants that successfully complete the program.

GMG's GAP participants are eligible for an affordability bill credit which was determined as one-twelfth of the difference between the estimate of the participant's annual gas bill and 4% of the participant's household income, calculated pursuant to GMG's tariff provisions. GMG's GAP participants who had an arrearage balance when they entered the program were also eligible for an arrearage forgiveness credit that was determined as an amount that would retire the customer's pre-program arrears over a period of up to 24 months, calculated pursuant to GMG's tariff provisions. Credit calculations were performed by ECC.

As part of GMG's commitment to improve its GAP and its effort to increase GAP participation, GMG substantially marketed its GAP to all of its customers with additional targeted marketing to at-risk customers. GMG's website contains information about both LIHEAP and GAP. The page provides information about both programs along with links to additional program information and application materials. GMG sent energy assistance awareness letters to certain targeted customers, including each customer that was currently receiving LIHEAP, those customers that previously received LIHEAP, and others. When GMG was notified new LIHEAP recipients, GMG reached out to each one with information regarding GAP. When any GMG residential customer receives written notice regarding possible disconnection, LIHEAP and GAP information is included. Moreover, GMG's customer service team makes phone calls to customers facing disconnection and discusses LIHEAP and GAP during those calls. Additionally, GMG reached out to churches and community organizations throughout its service territory, including via many face-to-face meetings, with a request that they also make their members and local residents aware of energy assistance and GAP programs by sharing information in their bulletins and through other means.

Administratively, ECC is responsible for receiving applications from potential GAP participants, determining eligibility, calculating GAP payment and credit amounts, sending out notification letters, and provision of some of the statistics required for regulatory purposes. GMG's personnel handles all billing and related processing; making calls to GAP participants who are approved for the program, who miss a monthly payment, who are in jeopardy of removal from the program for non-compliance, and to answer any GAP questions; and regulatory reporting.

ANNUAL REPORTING INFORMATION

The requisite statistical information regarding GMG's GAP for 2019 is found below:

- *Average annual affordability benefit received per GAP customer:* \$339.84 (\$28.32 per month)
- *Average annual arrearage forgiveness benefit received per GAP customer:* \$21.12 (\$1.76 per month). If the calculation is limited to only those GAP participants that had a past due balance, the average annual arrearage forgiveness benefit was \$105.60 (\$8.80 per month).
- *Percentage of LIHEAP customers that participated in GAP:* GMG had 108 customers that received LIHEAP during the 2019 calendar year, of which 29 participated in GAP at

some point throughout the year. Therefore, approximately 26.9% of GMG's customers that received LIHEAP funds participated in GAP during 2019.

- *Disconnection rates for GAP participants, non-GAP LIHEAP customers, and non-LIHEAP customers (all firm customers including commercial and industrial):*
 - Total number of firm customers that were disconnected: GMG disconnected 17 customers during 2019, which represents approximately 0.002% of its 9,006 firm customers as of December, 2019.
 - Total number of GAP participants that were disconnected: GMG did not disconnect any GAP participants in 2019; therefore, GAP participant disconnections represented 0% of GMG's firm customers as of December, 2019.
 - Total number of non-GAP LIHEAP customers that were disconnected: GMG did not disconnect any customers who received LIHEAP but who did not participate in GAP during 2019; therefore, the resulting disconnection rate for non-GAP LIHEAP customers was 0%.
 - Total number of non-LIHEAP firm customers that were disconnected: GMG disconnected 17 customers who did not receive LIHEAP during 2019, which represents approximately 0.002% of its firm customers as of December, 2019.

- *Number of GAP participants enrolled as of year-end: 25*

- *Number of GAP participants enrolled and receiving benefits at some time during the year: 29*

- *Annual program budget:* GMG's annual GAP budget is capped at \$20,000 for all estimated program costs.

- *Actual program revenue:* GMG did not have any GAP revenue for 2019, as it did not collect a rate-affordability surcharge during the year.

- *Actual program cost:* GMG's actual program cost for 2019 was approximately \$14,287. The actual cost includes a combination of GAP credits, outsourcing costs, GMG's internal administration costs, and regulatory charges including those related to regulatory review and approval of GAP reports.

- *GAP tracker balance as of year-end:* GMG has not instituted a tracker for the purpose of comparison and collection of actual program costs. Pursuant to GMG's tariff provisions, recovery of program costs will not begin until after the 2017 program year or at such time thereafter as regulatory approval is received. Nonetheless, GMG has historically kept an unofficial tracker that identified the GAP credits given since the inception of the GAP program. Consistent with its new GAP requirements and plan, GMG included the GAP credits given but also began adding all program costs including administrative and regulatory costs in its unofficial tracker. As of December 31, 2019, the tracker balance was \$49,577. GMG anticipates that its formal tracker will be instituted when regulatory

approval is received for the addition of a rate-affordability surcharge and that the tracker components will be identified and approved simultaneously therewith.

- *GAP rate-affordability surcharge (\$/therm) (after implementation):* \$0.00. GMG has not instituted a GAP rate-affordability surcharge at this time; and, pursuant to its tariff provisions, it may now consider proposing a surcharge. GMG has not yet made that determination.

The substantial changes in the marketing, content, and administration of GMG's GAP embody the commitment it made to improve and reshape its GAP. Although there has been little improvement in the actual number of GAP participants, GMG remains hopeful that its continued efforts will result in increased awareness and use of its GAP by qualifying customers.

CONCLUSION

GMG respectfully submits this Annual Report summarizing its GAP for the year ending December 31, 2019 in accordance with the requirements of its program and the Commission.

Dated: March 31, 2020

Respectfully submitted,
/s/
Kristine A. Anderson
Corporate Attorney
Greater Minnesota Gas, Inc.
1900 Cardinal Lane
P.O. Box 798
Faribault, MN 55021