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April 18, 2024

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

**RE: In the Matter of Great Plains' Petition for Approval of Renewable Natural Gas Producer Access and Interconnection Service Rate 87
Reply Comments to Department's Response Comments
Docket No. G004/M-24-73**

Dear Mr. Seuffert:

Great Plains Natural Gas Co. (Great Plains or the Company), a Division of Montana-Dakota Utilities Co., herewith electronically submits the Company's Reply Comments to the Response Comments of the Department of Commerce, Division of Energy Resources (Department) filed on April 4, 2024 regarding the Company's March 22, 2024 Reply Comments in the Company's Petition for Approval of Renewable Natural Gas Producer Access and Interconnection Service Rate 87 (Rate 87).

In the Department's April 4 Response Comments, the Department recommended approval of the Company's Petition, subject to the modifications and conditions outlined therein. Following are the Company's responses to each of the Department's recommendations and/or modifications outlined on page 10:

- 1) ***Revise the language on the Tariff to specify the Maintenance Fee is composed of two components, Routine and Extraordinary. Also include whether the components are estimated for the year ahead and revised annually or charged every month with no estimated value for the year.*** Great Plains will revise the tariff to reflect the Department's recommendation to identify that there are two components to the Maintenance Fee: (1) Routine which will be specified in the RNG Producer Access and Maintenance Agreement and updated annually to reflect actual costs and (2) Extraordinary that will be billed in full following the occurrence of any such costs incurred.
- 2) ***Include the suggested text to the Nomination and Balance Requirements section of the Tariff.*** Great Plains will include the text proposed in 9) of the

Company's March 22 Reply Comments regarding Daily Nominations Requirement.

- 3) ***Present appropriate text for a section specifying the term of the Interconnect Agreement to be included in the agreement and revised the Term Section on the Access and Maintenance Agreement to be consistent with the minimum twelve-month duration requirements stated in the tariff.*** Great Plains will include a terms provision in both agreements noting at least a minimum term of twelve months consistent with the minimum term's duration provision of the proposed tariff but whose actual term may exceed the minimum term as mutually agreed to by the parties. The terms will be specified in the agreements.
- 4) ***Present appropriate text modifying Paragraph 2 of the Interconnect Agreement to protect the Company (thus ratepayers) from potential negative balances.*** Great Plains will modify Paragraph 2 of the Interconnect Agreement to include "[a]ny balance remaining at the time the Agreement is terminated shall be due and paid to Great Plains at the time of termination" prior to the last sentence of Paragraph 2 to protect the Company and ratepayers from any potential negative balances.
- 5) ***Exclude the "Access Fee" clause from the Access and Maintenance Agreement.*** Great Plains will exclude "Access Fee" from Paragraph 5 of the Access and Maintenance Agreement as agreed to in 8) of the Company's March 22 Reply Comments.
- 6) ***Direct Great Plains to consider exploring the possibility or requiring different quality standards for different RNG sources, considering the trade-off between imposing the same quality standards across all possibly sources being potentially too restrictive versus the gain obtained from higher quality standards being more beneficial to the Company's obligation to ensure the integrity, safety and reliability of its system.*** Great Plains believes there are significant challenges with allowing different quality standards depending on the RNG source and therefore continue to believe that all RNG sources be held to the same quality requirements if interconnecting to the Company's distribution system.
- 7) ***Comply with quality reporting requirements as set forth in Order Point 4 of the Commission's January 26, 2021 Order in Docket No. G004/M-20-434.*** As noted in 10) of Great Plains' March 22 Reply Comments, the Company will comply with the requirements set forth in Order Point 4 of the Commission's January 26, 2021 Order in Docket No. G004/M-20-434as
- 8) ***Comply with Order Points 10, excluding points E, F, and G and 11, excluding points E and F of the Commission's January 26, 2021 approving CenterPoint's RNG Interconnection process in Docket No. G008/M-20-434.***

As noted in 11) of Great Plains' March 22 Reply Comments, the Company will comply with the order points outlined in the Department's recommendation. Great Plains also requests that D of Order Point 11 also be excluded from the Company's reporting as information being required under D would also be that of the RNG producers and not information that Company would have available to it and therefore administratively burdensome to provide.

- 9) ***Comply with Order Point 8 of the Commission's January 26, 2021 approving CenterPoint's RNG interconnection process in Docket No. G008/M-20-434.*** The Company will comply with Order Point 8 of the Commission's January 26, 2021 approving CenterPoint's RNG interconnection process in Docket No. G008/M-20-434 if an affiliate of Great Plains becomes involved in an RNG interconnection project in Minnesota.
- 10) ***Track all of the actual costs separately for each and all RNG supplier that the Company interconnects and the total RNG received by each RNG supplier in dekatherms, identifying these costs using appropriate FERC accounts, sub accounts and/or FERC account equivalents and Great Plains charted accounts and/or sub-accounts.*** As noted in 6) of the Company's March 22 Reply Comments, Great Plains will separately track all costs associated an RNG interconnection. The Company also agrees to separately track the total RNG received by each RNG supplier.

Great Plains appreciates the Department's Response Comments on the Company's March 22 Reply Comments and requests Commission approval reflecting the changes outlined under the "Additional Comments" section of the Company's March 22 Reply Comments and those agreed to herein.

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

Sincerely,

/s/ Travis R. Jacobson

Travis R. Jacobson
Director of Regulatory Affairs

cc: Kristin Stastny
Service List