

Staff Briefing Papers

Meeting Date July 9, 2026

Agenda Item 1*

Company Lakes Community Co-op
United Natural Gas, LLC
Lake Regional Energy Services
Dooley's Natural Gas I, LLC
Dooley's Natural Gas II, LLC
Paul Bunyan Natural Gas, LLC
Northwest Natural Gas LLC

Docket Nos. **G999/PR-25-15**

In the Matter of a Petition of Lakes Community Co-op for an Exemption for Small Gas Utility Franchise

In the Matter of a Petition of United Natural Gas, LLC for Exemption for Small Gas Utility

In the Matter of an Exemption for Small Gas Utility Franchise – Lake Region Energy Services, Cities of Dent, Miltona, Deer Creek and Parkers Prairie, MN

In the Matter of an Exemption for Small Gas Utility Franchise – Dooley's Natural Gas - Cities of Clara City, Maynard, Raymond, Prinsburg and Blomkest, MN

In the Matter of an Exemption for Small Gas Utility Franchise – Dooley's Natural Gas II - Cities of Belgrade and Brooten, MN

In the Matter of an Exemption for Small Gas Utility Franchise – Paul Bunyan Natural Gas LLC – City of Walker

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The attached materials are work papers of the Commission Staff. They are intended for use by the Public Utilities Commission and are based upon information already in the record unless noted otherwise.

In the Matter of an Exemption for Small Gas Utility Franchise – Northwest Natural Gas LLC (Gorham’s Inc., Northwest Natural Gas, LLC, Northwest Natural Gas of Murray County, Inc., and Northwest Natural Gas of Cass County LLC)

Issue	Should the Commission approve the annual compliance filings from Lakes Community Co-op, United Natural Gas, LLC, Lake Region Energy Services, Dooley’s Natural Gas I, LLC, Dooley’s Natural Gas II, LLC, Paul Bunyan Natural Gas LLC, and The Northwest Utilities ?		
Staff	Andrew Larson	Andrew.m.larson@state.mn.us	651-201-2259



Relevant Documents

Date

Lake Region Energy Services, Inc. – Compliance Filings	April 29, 2025
Dooley’s Natural Gas, LLC – Compliance Filing & Nat Gas Rate Book	April 30, 2025
Dooley’s Natural Gas II, LLC – Compliance Filing & Nat Gas Rate Book	April 30, 2025
United Natural Gas, LLC – Compliance Filings	May 1, 2025
Northwest Natural Gas LLC	May 1, 2025
Lakes Community Co-op – Compliance Filing	May 5, 2025
Lakes Community Co-op – Meter Count	May 5, 2025
Paul Bunyan Natural Gas LLC	February 24, 2026
Department of Commerce-DER – Comments	April 15, 2026
Department of Commerce-DER – Letter	June 30, 2026

I. Background

Lakes Community Co-op, United Natural Gas LLC, Lake Region Energy Services Inc., Dooley's Natural Gas LLC, Dooley's Natural Gas II LLC, Paul Buyan Natural Gas LLC, and Northwest Natural Gas LLC received Commission approval and confirmation of their small gas utility franchise exemptions, pursuant to Minn. Stat. §216B.16, Subd. 12.¹ This exemption allows small gas providers to provide natural gas service to customers located in municipalities and nearby incidental loads without being subject to Commission rate regulation. Instead of Commission oversight, governance is provided by the municipalities.

On November 9, 2018, the Commission issued its Order Determining Compliance with Commission Orders and Establishing Filing Requirements, in the original five dockets, which required a uniform compliance filing from each of the exempt small gas utilities by May 1, 2019.² The compliance filings were required to include:

- Updated customer counts with a statement that the utility doesn't discriminate between customers that are located inside or outside the municipality, and if it does, why;
- Any municipality-approved rate changes that occurred in the prior year and when these changes went into effect;
- All changes to the tariff book in redlined and final revised form;
- A copy of the Cold Weather Rule disconnection notice sent to all customers, including how the notice was communicated and the date sent;
- A copy of any utility disconnection reports served to any municipalities; and
- A copy of the notice form sent to customers in arrears with any policy not clearly identified in the tariff regarding budget billing plans, payment arrangements, and under-charge repayment.

In its November 9, 2018 Order, the Commission also stated that after submitting their May 1, 2019 compliance filings:

Each year thereafter, all small gas utilities will be required to provide any updates to the data filed for 2019. If there are no changes to the data submitted in the 2019 report, the small gas utility shall file a letter saying there are no changes.³

¹ Minn. Stat. §216B.16, Subd. 12. **Exemption for small gas utility franchise.**

(<https://www.revisor.mn.gov/statutes/cite/216B.16#stat.216B.16.12>)

² G-6956/M-15-856, G-6960/M-16-214, G-6977/M-17-186, G-6915/M-13-672 & G-6915/M-16-756 Commission Order Determining Compliance with Commission Orders and Establishing Filing Requirements, November 9, 2018.

³ G-6956/M-15-856, G-6960/M-16-214, G-6977/M-17-186, G-6915/M-13-672 & G-6915/M-16-756 Commission Order Determining Compliance with Commission Orders and Establishing Filing Requirements, November 9, 2018, p. 4.

On October 7, 2019, the Commission issued an Order, in these dockets,⁴ in which it agreed with and adopted the recommendations of the Department of Commerce to approve the compliance filings.

On March 10, 2021, the Commission issued an Order, in these dockets,⁵ approving the 2020 Compliance Filings, following the February 25, 2021 agenda meeting.

On September 7, 2021, the Commission issued an Order, in these dockets, approving the 2021 Compliance Filings, following the August 26, 2021 agenda meeting.⁶ The Commission required small gas utilities to provide the additional information noted below:

- Future small gas utility franchise annual compliance filings shall provide copies of the utilities' tariffs reflecting the legislatively mandated extension of the Cold Weather Rule period to October 1 to April 30 for residential customers, as well as copies of any updated cold weather disconnection notices. All small gas utilities must continue to comply with Minn. Stat. § 216B.16, subp. 12(b), which states: "The public utility shall file with the commission and the department all initial and subsequent changes in rates, tariffs, and contracts for service outside the municipality at least 30 days in advance of implementation."
- Future small gas utility franchise annual compliance filings shall provide customer counts reflecting the number of persons or businesses served (i.e., customers) rather than a customer count based on the number of meters.
- Future small gas utility franchise annual compliance filings shall provide the following: updated total customer counts for all municipal franchises, the number of customers served under each municipal franchise, and the number of customers served outside of each municipality's border that the utility claims are incidental.

On August 25, 2025, the Commission issued an Order, in these dockets,⁷ approving the 2022 and 2023 Compliance Filings.

⁴ G-6956/M-15-856, G-6960/M-16-214, G-6977/M-17-186, G-6915/M-13-672 & G-6915/M-16-756 Commission Order Determining Compliance with Commission Orders and Establishing Filing Requirements, October 7, 2019 p. 1.

⁵ G-6956/M-15-856, G-6960/M-16-214, G-6977/M-17-186, G-6977/M-17-829, G-6915/M-13-672 & G-6915/M-16-756 Commission Order Determining Compliance with Commission Orders and Establishing Filing Requirements, March 10, 2021, p. 2.

⁶ G-6956/M-15-856, G-6960/M-16-214, G-6977/M-17-186, G-6977/M-17-829, G-6915/M-13-672 & G-6915/M-16-756 Commission Order Approving 2021 Compliance Filings and Adopting Future Filing Requirements, September 7, 2021, p. 4.

⁷ G-6956/M-15-856, G-6960/M-16-214, G-6977/M-17-186, G-6977/M-17-829, G-6915/M-13-672, G-6915/M-16-756, G-7066/EX-21-693, G-6278,6279,6280/CI-18-770, and G-999/PR-24-15 Commission Order Determining Compliance with Commission Orders and Establishing Filing Requirements, August 25, 2025, p. 1.

II. Compliance Filings

Staff reviewed the Companies' 2024 compliance filings to determine if they were consistent with the requirements contained in the Commission's Orders. Staff organized these comments using a standardized checklist.

A. Lakes Community Co-op (G-999/PR-25-15)

Lakes Community Co-op supplies natural gas service to Mahnomen, Twin Valley, Fertile, Beltrami, Red Lake Falls, Gary, Waubun, and Fisher and incidental customers.

Table 1 summarizes Community Co-ops' 2024 compliance filing and ensuing communications:

Table 1: Lakes Community Co-op 2024 Compliance Filing Checklist⁸

Requirement	Information Included	Notes/Comments
<i>Customer count</i>	Yes	Customer count is 1,363 as of December 31, 2024.
<i>Non-discrimination statement or explanation</i>	Yes	No discrimination between in-municipality and out-municipality customers with rates the same for both.
<i>List of municipality-approved rate changes</i>	Yes	There were no rate changes for 2024.
<i>Copy of Cold Weather Rule disconnection notice</i>	Yes	No change to Cold Weather Rule disconnection notice. Copy included.
<i>Date and delivery method of Cold Weather Rule disconnection notice</i>	Yes	Notice was mailed to all customers on August 2, 2024.
<i>Copies of any utility disconnection reports served to any of the municipalities required by statute</i>	Yes	No municipalities requested notice of disconnection.
<i>Copy of customer past due/arrearage forms</i>	Yes	No change to past due notice. Copy included.
<i>Copy of any policy not included in tariffs related to budget billing plans, payment arrangements, and under-charge repayments</i>	Yes	See April 10 email from LCC staff to the Department.

⁸ G-999/PR-25-15 Community Co-ops of Lake Park compliance filing, May 5, 2025.

B. United Natural Gas (G-999/PR-25-15)

UNG supplies natural gas service to Windom, Courtland, and Lafayette and incidental customers.

Table 2 summarizes United Natural Gas' 2024 compliance filing:

Table 2: UNG 2024 Compliance Filing Checklist⁹

<i>Requirement</i>	<i>Information Included</i>	<i>Notes/Comments</i>
<i>Customer count</i>	Yes	Customer count is 563 as of December 31, 2024.
<i>Non-discrimination statement or explanation</i>	Yes	All customers treated equally, and rates apply to customers within and outside a municipality.
<i>List of municipality-approved rate changes</i>	Yes	No rate changes in 2024.
<i>Copy of Cold Weather Rule disconnection notice</i>	Yes	No change to Cold Weather Rule disconnection notice. Copy included.
<i>Date and delivery method of Cold Weather Rule disconnection notice</i>	Yes	Notice was mailed to all customers with September 1, 2024 billing statement.
<i>Copies of any utility disconnection reports served to any of the municipalities required by statute</i>	Yes	No customers were disconnected in 2024
<i>Copy of customer past due/arrearage forms</i>	Yes	No change to past due notice. Past Due Letter and Secure Pay Plan mailed to customers in arrears. Copy included.
<i>Copy of any policy not included in tariffs related to budget billing plans, payment arrangements, and under-charge repayments</i>	Yes	No tariff book changes in 2024.

⁹ G-999/PR-25-15 United Natural Gas compliance filing, May 1, 2025.

C. Lake Region Energy Services (G-999/PR-25-15)

LRES supplies natural gas service to Parkers Prairie, Deer Creek, Dent, Little McDonald Lake, Miliona, and Lake Miliona and incidental customers.

Table 3 summarizes Lake Region Energy Services' 2024 compliance filing:

Table 3: LRES 2024 Compliance Filing Checklist¹⁰

Requirement	Information Included	Notes/Comments
Customer count	Yes	Customer count is 1,116 as of January 1, 2025.
Non-discrimination statement or explanation	Yes	No discrimination between customers within and outside municipalities. Rates differ between classes but are uniform within each class.
List of municipality-approved rate changes	Yes	Unchanged since last compliance filing.
Copy of Cold Weather Rule disconnection notice	Yes	No change to Cold Weather Rule disconnection notice. Copy included.
Date and delivery method of Cold Weather Rule disconnection notice	Yes	Notice was mailed to all customers with September 1, 2024 billing statement.
Copies of any utility disconnection reports served to any of the municipalities required by statute	Yes	No municipalities requested notice of disconnection.
Copy of customer past due/arrears forms	Yes	No change to past due notice. Copy included.
Copy of any policy not included in tariffs related to budget billing plans, payment arrangements, and under-charge repayments	Yes	none

¹⁰ G-999/PR-25-15 Lake Region Energy Services compliance filing, April 29, 2025.

D. Dooley's Natural Gas, LLC (G-999/PR-25-15)

Dooley's Natural Gas, LLC supplies natural gas service to the Cities of Clara City, Maynard, Raymond, Prinsburg and Blomkest, and incidental customers.

Table 4 summarizes Dooley's Natural Gas, LLC 2024 compliance filing:

Table 4: Dooley's Natural Gas, LLC 2024 Compliance Filing Checklist¹¹

Requirement	Information Included	Notes/Comments																																				
Customer count	Yes	Customer count is 1,433 as of December 31, 2024.																																				
Non-discrimination statement or explanation	Yes	No discrimination in rate design or customer service/policy between customers within and outside municipalities.																																				
List of municipality-approved rate changes	Yes	<p>New rates (per Therm) effective June 1, 2024</p> <p>Delivery Rates (Per Therm)</p> <table border="1"> <thead> <tr> <th></th> <th>Previous</th> <th>New</th> </tr> </thead> <tbody> <tr> <td>Residential</td> <td>\$ 0.4311</td> <td>\$ 0.5311</td> </tr> <tr> <td>Commercial</td> <td>\$ 0.4311</td> <td>\$ 0.5311</td> </tr> <tr> <td>Industrial</td> <td>\$ 0.3674</td> <td>\$ 0.4674</td> </tr> <tr> <td>Ag. Heating</td> <td>\$ 0.3114</td> <td>\$ 0.4114</td> </tr> <tr> <td>Ag. Drying</td> <td>\$ 0.3331</td> <td>\$ 0.4331</td> </tr> </tbody> </table> <p>Customer Monthly Meter Charge</p> <table border="1"> <thead> <tr> <th></th> <th>Previous</th> <th>New</th> </tr> </thead> <tbody> <tr> <td>Residential</td> <td>\$ 9.00</td> <td>\$ 9.00</td> </tr> <tr> <td>Commercial</td> <td>\$ 15.00</td> <td>\$ 15.00</td> </tr> <tr> <td>Industrial</td> <td>\$ 28.30</td> <td>\$ 28.30</td> </tr> <tr> <td>Ag. Heating</td> <td>\$ 90.00</td> <td>\$ 90.00</td> </tr> <tr> <td>Ag. Drying</td> <td>\$ 90.00</td> <td>\$ 90.00</td> </tr> </tbody> </table>		Previous	New	Residential	\$ 0.4311	\$ 0.5311	Commercial	\$ 0.4311	\$ 0.5311	Industrial	\$ 0.3674	\$ 0.4674	Ag. Heating	\$ 0.3114	\$ 0.4114	Ag. Drying	\$ 0.3331	\$ 0.4331		Previous	New	Residential	\$ 9.00	\$ 9.00	Commercial	\$ 15.00	\$ 15.00	Industrial	\$ 28.30	\$ 28.30	Ag. Heating	\$ 90.00	\$ 90.00	Ag. Drying	\$ 90.00	\$ 90.00
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Copy of Cold Weather Rule disconnection notice	Yes	No change to Cold Weather Rule disconnection notice. Copy included.																																				
Date and delivery method of Cold Weather Rule disconnection notice	Yes	Notice was mailed or emailed with August 2024 customer billing on September 10, 2024.																																				
Copies of any utility disconnection reports served to any of the municipalities required by statute	Yes	No municipalities requested notice of disconnection.																																				
Copy of customer past due/arrears forms	Yes	No changes to past due notice. Copy included.																																				
Copy of any policy not included in tariffs related to	Yes	No changes to tariffs.																																				

¹¹ G-999/PR-25-15 Dooley's Natural Gas compliance filing, April 30, 2025.

<i>budget billing plans, payment arrangements, and under-charge repayments</i>		
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E. Dooley's Natural Gas II, LLC (G-999/PR-25-15)

Dooley's Natural Gas II, LLC supplies natural gas service the Cities of Belgrade and Brooten and incidental customers.

Table 5 summarizes Dooley's Natural Gas II, LLC 2024 compliance filing:

Table 5: Dooley's II 2024 Compliance Filing Checklist¹²

<i>Requirement</i>	<i>Information Included</i>	<i>Notes/Comments</i>																																				
<i>Customer count</i>	Yes	Customer count is 506 as of December 31, 2024.																																				
<i>Non-discrimination statement or explanation</i>	Yes	No discrimination in rate design or customer service/policy between customers within and outside municipalities.																																				
<i>List of municipality-approved rate changes</i>	Yes	<p>New rates (per Therm) effective June 1, 2024</p> <p>Delivery Rates (Per Therm)</p> <table> <thead> <tr> <th></th> <th>Previous</th> <th>New</th> </tr> </thead> <tbody> <tr> <td>Residential</td> <td>\$ 0.4311</td> <td>\$ 0.5311</td> </tr> <tr> <td>Commercial</td> <td>\$ 0.4311</td> <td>\$ 0.5311</td> </tr> <tr> <td>Industrial</td> <td>\$ 0.3674</td> <td>\$ 0.4674</td> </tr> <tr> <td>Ag. Heating</td> <td>\$ 0.3114</td> <td>\$ 0.4114</td> </tr> <tr> <td>Ag. Drying</td> <td>\$ 0.3331</td> <td>\$ 0.4331</td> </tr> </tbody> </table> <p>Customer Monthly Meter Charge</p> <table> <thead> <tr> <th></th> <th>Previous</th> <th>New</th> </tr> </thead> <tbody> <tr> <td>Residential</td> <td>\$ 9.00</td> <td>\$ 9.00</td> </tr> <tr> <td>Commercial</td> <td>\$ 15.00</td> <td>\$ 15.00</td> </tr> <tr> <td>Industrial</td> <td>\$ 28.30</td> <td>\$ 28.30</td> </tr> <tr> <td>Ag. Heating</td> <td>\$ 90.00</td> <td>\$ 90.00</td> </tr> <tr> <td>Ag. Drying</td> <td>\$ 90.00</td> <td>\$ 90.00</td> </tr> </tbody> </table>		Previous	New	Residential	\$ 0.4311	\$ 0.5311	Commercial	\$ 0.4311	\$ 0.5311	Industrial	\$ 0.3674	\$ 0.4674	Ag. Heating	\$ 0.3114	\$ 0.4114	Ag. Drying	\$ 0.3331	\$ 0.4331		Previous	New	Residential	\$ 9.00	\$ 9.00	Commercial	\$ 15.00	\$ 15.00	Industrial	\$ 28.30	\$ 28.30	Ag. Heating	\$ 90.00	\$ 90.00	Ag. Drying	\$ 90.00	\$ 90.00
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<i>Copy of Cold Weather Rule disconnection notice</i>	Yes	No change to Cold Weather Rule disconnection notice. Copy included.																																				
<i>Date and delivery method of Cold Weather Rule disconnection notice</i>	Yes	Notice was mailed or emailed with August 2024 customer billing on September 10, 2024.																																				
<i>Copies of any utility disconnection reports served to any of the</i>	Yes	No municipalities requested notice of disconnection.																																				

¹² G-999/PR-25-15 Dooley's II compliance filings, April 30, 2025.

<i>municipalities required by statute</i>		
<i>Copy of customer past due/arrearage forms</i>	Yes	No changes to past due notice. Copy included.
<i>Copy of any policy not included in tariffs related to budget billing plans, payment arrangements, and under-charge repayments</i>	Yes	No changes to tariffs.

F. Paul Bunyan Natural Gas LLC (G-999/PR-25-15)

Paul Bunyan Natural Gas supplies natural gas service to the City of Walker and incidental customers in Shingobee Township.

Table 6 summarizes Paul Bunyan Natural Gas LLC 2024 compliance filing:

Table 6: Paul Bunyan LLC 2024 Compliance Filing Checklist¹³

Requirement	Information Included	Notes/Comments
<i>Customer count</i>	Yes	Customer count is 667 as of December 31, 2024.
<i>Non-discrimination statement or explanation</i>	Yes	No discrimination in rate design or customer service/policy between customers within and outside municipalities.
<i>List of municipality-approved rate changes</i>	Yes	No rate changes in 2024.
<i>Copy of Cold Weather Rule disconnection notice</i>	Yes	No change to Cold Weather Rule disconnection notice. Copy included.
<i>Date and delivery method of Cold Weather Rule disconnection notice</i>	Yes	Notice was mailed or emailed with September 2024 customer bill.
<i>Copies of any utility disconnection reports served to any of the municipalities required by statute</i>	Yes	No municipalities requested notice of disconnection.
<i>Copy of customer past due/arrearage forms</i>	Yes	No changes to past due notice. Copy included.
<i>Copy of any policy not included in tariffs related to budget billing plans, payment arrangements,</i>	Yes	No changes to tariffs.

¹³ G-999/PR-25-15 Paul Bunyan LLC compliance filings, February 24, 2026.

<i>and under-charge repayments</i>		
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G. The Northwest Utilities (G-999/PR-25-15)

Northwest Natural Gas consists of Northwest Natural Gas LLC, Northwest Natural Gas of Murray County LLC, and Gorhams, Inc.

Table 6 summarizes The Northwest Utilities 2024 compliance filing:

Table 7: The Northwest Utilities 2024 Compliance Filing Checklist¹⁴

<i>Requirement</i>	<i>Information Included</i>	<i>Notes/Comments</i>
<i>Customer count</i>	Yes	Customer count is 4,958 as of December 31, 2024.
<i>Non-discrimination statement or explanation</i>	Yes	No discrimination in rate design or customer service/policy between customers within and outside municipalities.
<i>List of municipality-approved rate changes</i>	Yes	No rate changes in 2024.
<i>Copy of Cold Weather Rule disconnection notice</i>	Yes	No change to Cold Weather Rule disconnection notice. Copy included.
<i>Date and delivery method of Cold Weather Rule disconnection notice</i>	Yes	Notice was mailed in September 2024 customer bill. Copy included.
<i>Copies of any utility disconnection reports served to any of the municipalities required by statute</i>	Yes	No municipalities requested notice of disconnection.
<i>Copy of customer past due/arrearage forms</i>	Yes	No changes to past due notice. Copy included.
<i>Copy of any policy not included in tariffs related to budget billing plans, payment arrangements, and under-charge repayments</i>	Yes	No changes to tariffs.

¹⁴ G-999/PR-25-15 The Northwest Utilities compliance filings, May 1, 2025.

III. Parties' Comments

The Minnesota Department of Commerce, Division of Energy Regulation (Department) commented in the docket on April 15, 2026. The Department analyzed the compliance filings in the seven dockets and included an attachment with customer counts for all small gas exempt utilities. The Department recommended that the Commission approve the small exempt gas utilities' 2024 compliance filings but noted that only The Northwest Utilities provided information on the number of customers served outside of each municipality's border that the utility claims are incidental. In response to Department information requests, the other six exempt small gas utilities provided this information.

The Department filed a letter dated June 30, 2026 in which it provided additional commentary on rate/tariff review for each exempt small gas utility. The Department continued to recommend Commission approval of each utilities' compliance filings.

IV. Staff Analysis

The total number of customers served by these companies in 2024 was 11,959. The total number of customers in 2023 was 11,947, which is a 0.1 percent increase.

Staff concludes that Lakes Community Co-op, United Natural Gas, Lake Region Energy Services, Dooley's, Dooley's II, Paul Bunyan, and The Northwest Utilities have complied with the Commission's 2018 Order establishing filing requirements and recommends that the 2024 compliance filings be accepted.

V. Decision Options

1. Approve the compliance filings from Lakes Community Co-op, United Natural Gas, LLC, Lake Region Energy Services Inc., Dooley's Natural Gas, LLC, Dooley's Natural Gas II, LLC, Paul Bunyan Natural Gas LLC, and The Northwest Utilities. *[Department]*
2. Do not approve the compliance filings from Lakes Community Co-op, United Natural Gas, LLC, Lake Region Energy Services Inc., Dooley's Natural Gas, LLC, Dooley's Natural Gas II, LLC, Paul Bunyan Natural Gas LLC, and The Northwest Utilities.