

June 30, 2026

Sasha Bergman
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Minnesota Department of Commerce – Additional Information/Recommendation
Docket No. G999/PR-25-15

Dear Ms. Bergman,

On April 15, 2026, the Minnesota Department of Commerce (Department) filed comments in the following matter:

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

In the Matter of a Petition by United Natural Gas for a Small Gas Utility Franchise Exemption

In the Matter of a Petition by Lake Region Energy Services for a Small Gas Utility Franchise Exemption

In the Matter of a Petition by Dooley's Natural Gas I for a Small Gas Utility Franchise Exemption

In the Matter of a Petition by Dooley's Natural Gas II for a Small Gas Utility Franchise Exemption

In the Matter of a Petition by Paul Bunyan Natural Gas for a Small Gas Utility Franchise Exemption

In the Matter of a Petition by the Northwest Utilities: (Northwest Natural Gas LLC, Northwest Natural Gas of Murray County LLC, Gorman's Inc. for a Small Gas Utility Franchise Exemption

The Department's comments were filed in response to a Notice of Comment issued by the Minnesota Public Utilities Commission (Commission) on March 2, 2026.¹

Commission staff's review of those comments noted that the Department hadn't included a company-specific review of the different Exempt Small Gas Utilities (ESGUs) compliance efforts regarding changes to their respective tariffs.

¹ *In the Matter of a Petition by Dooley's Natural Gas I for a Small Gas Utility Franchise Exemption*, Minnesota Department of Commerce, April 15, 2026, Docket No. G999/PR-15, (eDockets) [20264-230462-01](#) (hereinafter "Department Comments").

The Department apologizes for this oversight, and this letter serves as the Department's response/analysis to the compliance-related issue identified. This review addresses the ESGU's compliance efforts regarding maintaining a current tariff in the same order as the Department used in its April 15, 2026, comments.

1. Dooley's Natural Gas I LLC and Dooley's Natural Gas II LLC

Dooley's I and II completed rate/tariff reviews in 2024, which triggered this compliance-related requirement. Those reviews resulted in an increase in the Delivery or volumetric component of base rates for all customer classes. Both Dooley's I and II appear to have identical rate design and rates so the increases occurred for both entities.^{2,3}

Dooley's I and II's filings included tariff updates in both red-lined and clean formats in Attachment C of their respective filings. They included the following sections of the tariffs:

- a) For Dooley's Natural Gas I LLC only,
 - a. Section II Service Area which separated Cities and Townships into different categories.
 - b. Section XXX – Terms and Conditions – Definitions, Extraordinary Events.
- b) For both LLCs,
 - a. Sections V through IX which update the rates for each of Dooley's rate schedules.
 - b. Section IX which updated the winter construction charges for the Large Agricultural Drying Sales Service rate schedule.
 - c. Section XXX – Terms and Conditions - Fees and Charges, Other Fees and Charges, Billing, Service, Disconnections and Reconnections, and Billing.^{4,5}

The Department reviewed the language in each of the sections listed above as part of its review and concluded that Dooley's updated tariffs comply with the Commission's current requirements. Thus, the Department recommends Commission approval of Dooley's Natural Gas I LLC and Dooley's Natural Gas II LLC's proposed tariffs.

² *In the Matter of a Petition by Dooley's Natural Gas I for a Small Gas Utility Franchise Exemption*, Dooley's Natural Gas, April 30, 2025, Docket No. G999/PR-15, (eDockets) [20254-218362-01](#) (hereinafter "Dooley's I 2024 ACF"). This document was also filed in the original docket, Docket No. G6915/M-13-672.

³ *In the Matter of a Petition by Dooley's Natural Gas II for a Small Gas Utility Franchise Exemption*, Dooley's Natural Gas, April 30, 2025, Docket No. G999/PR-15, (eDockets) [20254-218363-01](#) (hereinafter "Dooley's II 2024 ACF"). This document was also filed in the original docket, Docket No. G6915/M-16-756.

⁴ Dooley's I 2024 ACF, Attachment C.

⁵ Dooley's II 2024 ACF, Attachment C.

2. Lakes Community Co-op

Lakes Community Co-op noted in its annual compliance filing (ACF) that it had not initiated or completed any changes to its rate book in 2024.⁶ Hence, no discussion on this topic is warranted and the Department recommends Commission approval of Lakes Community Co-op's tariff.

3. Lake Region Energy Services

Lake Region Energy Services noted in its 2024 annual compliance filing that it had not initiated or completed any changes to its rate book in 2024.⁷ Thus, no discussion on this topic is warranted and the Department recommends Commission approval of Lake Region Energy Service's tariff.

4. Northwest Utilities (Northwest)

Northwest noted in its 2024 ACF that it had not initiated or completed any changes to its rate book in 2024.⁸ In response to information request 6 Northwest noted that it had updated its subsidiaries tariffs to incorporate its policies related to budget billing plans, payment arrangements and under-charge repayment. Northwest also noted this change was consistent with Minn. Stat. § 216B.098.⁹ The Department appreciates Northwest's efforts in this regard and concludes its subsidiaries' tariffs are in compliance with the Commission's requirements. Hence, the Department recommends Commission approval of Northwest Utilities subsidiaries' tariffs.

5. Paul Bunyan Natural Gas LLC (Paul Bunyan)

Paul Bunyan noted in the Company's 2024 ACF that it had not initiated or completed any changes to its rate book in 2024.¹⁰ In response to information request 5 Paul Bunyan noted that it had updated its tariff to incorporate its policies related to budget billing plans, payment arrangements and under-charge repayment. Paul Bunyan also noted this change was consistent with Minn. Stat. § 216B.098.¹¹ The Department also appreciates Paul Bunyan's efforts in this regard and concludes its tariff is in compliance with the Commission's requirements. Thus, the Department recommends Commission approval of Paul Bunyan's tariff.

⁶ *In the Matter of a Petition by Lakes Community Co-op for a Small Gas Utility Franchise Exemption*, Lakes Community Co-op, May 5, 2025, Docket No. G999/PR-15, (eDockets) [20255-218582-02](#).

⁷ *In the Matter of a Petition by Lake Region Energy Services for a Small Gas Utility Franchise Exemption*, Lake Region Energy Services, April 29, 2025, Docket No. G999/PR-15, (eDockets) [20254-218297-01](#).

⁸ *In the Matter of a Petition by the Northwest Utilities: (Northwest Natural Gas LLC, Northwest Natural Gas of Murray County LLC, Gorman's Inc. for a Small Gas Utility Franchise Exemption*, Northwest Utilities, May 1, 2025, Docket No. G999/PR-15, (eDockets) [20255-218465-01](#).

⁹ See Department Comments Attachment 4 .

¹⁰ *In the Matter of a Petition by Paul Bunyan Natural Gas for a Small Gas Utility Franchise Exemption*, Paul Bunyan Natural Gas, February 24, 2026, Docket No. G999/PR-15, (eDockets) [20262-228556-01](#).

¹¹ See Department Comments Attachment 5.

6. *United Natural Gas LLC (United)*

United noted in its 2024 annual compliance filing that it had not initiated or completed any changes to its rate book in 2024.¹² Hence, no discussion on this topic is warranted and the Department recommends Commission approval of United Natural Gas' tariff.

This concludes the Department's review of the tariff provisions included in the different ESGU's 2024 ACFs.

The Department also notes that it apologizes for this oversight, continues to recommend approval of each of seven ESGU's 2024 ACFs and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

JK/ad

¹² *In the Matter of a Petition by United Natural Gas for a Small Gas Utility Franchise Exemption*, United Natural Gas, May 1, 2025, Docket No. G999/PR-15, (eDockets) [20255-218450-01](#).

CERTIFICATE OF SERVICE

I, Nicole Westling, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Letter**

Docket No. G999/PR-25-15

Dated 30th day of **June 2026**

/s/Nicole Westling

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	County	Administrator		Nicollet County Administrator		501 S Minnesota Ave St Peter MN, 56082 United States	Paper Service		No	Official 25-15
2	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	Official 25-15
3	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-15
4	David	Blomseth	davidb@communitycoops.com	Lakes Community Coop		PO Box 329 14583 Hwy 10 W Lake Park MN, 56554 United States	Paper Service		No	Official 25-15
5	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-15
6	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 600 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-15
7	Joel	Dahlgren	joel.dahlgren@ufcmn.com	United Farmers Cooperative		PO Box 461 Winthrop MN, 55396 United States	Paper Service		No	Official 25-15
8	Randy	Dooley	rdooley@dooleypetro.com	Dooley's Natural Gas, LLC		3101 3rd Ave SW Willmar MN, 56201 United States	Electronic Service		No	Official 25-15
9	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	Official 25-15
10	Ryan D	Fullerton	r.fullerton@pemlaw.com	Pemberton, Sorlie, Rufer & Kershner		110 North Mill St Fergus Falls MN, 56537 United States	Electronic Service		No	Official 25-15
11	Mike	Gorham	mike@nwgas.com	Gorham's Inc dba Northwest Gas		1608 NW 4th St Grand Rapids MN, 55744 United States	Electronic Service		No	Official 25-15
12	Jessica	Halvorson	jhalvor@arvig.net	Wambach & Hanson Law Office, P.C.		PO Box 340 Mahnomon MN, 56557 United States	Electronic Service		No	Official 25-15

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
13	Elroy E.	Hanson	ehanson@arvig.net	Wambach & Hanson Law Office PC		304 N Main St PO Box 340 Mahnomon MN, 56557 United States	Electronic Service		No	Official 25-15
14	Ashley	Harrison	ashley.harrison@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Dr NW Cass Lake MN, 56633 United States	Electronic Service		No	Official 25-15
15	Gregory	Hauptert	ghauptert@parthenonagency.com	Sobalvarro & Hauptert		3601 18th St. S. Ste 105 St. Cloud MN, 56301 United States	Electronic Service		No	Official 25-15
16	Steven C	Jones	cityadmin@hcinet.net	City of Clara City		215 First St NW PO Box 560 Clara City MN, 56222 United States	Paper Service		No	Official 25-15
17	Clark	Kaml	clark.kaml@gmail.com	CDK Consulting, LLC		2624 Mistwood Court Grand Forks ND, 58201 United States	Electronic Service		No	Official 25-15
18	Tony	Kammerlander	tony.kammerlander@ufcmn.com	United Natural Gas		PO Box 461 Winthrop MN, 55396 United States	Electronic Service		No	Official 25-15
19	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	Official 25-15
20	Cheryl	Landsteiner	cheri@nwnngas.com	Northwest Natural Gas LLC		314 Main St NE PO Box 721 Mapleton MN, 56065 United States	Electronic Service		No	Official 25-15
21	Robert L	Larsen	robert.larsen@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Paper Service		No	Official 25-15
22	Bruce	Nelson	tbnelson@loretel.net	Lakes Community Coop		PO Box 329 14583 Hwy 10 W Lake Park MN, 56554 United States	Electronic Service		No	Official 25-15
23	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	Official 25-15

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
24	Brian	Pendleton				PO Box 308 39527 Reservation Hwy 1 Morton MN, 56270 United States	Paper Service		No	Official 25-15
25	Al	Poehler	ctclerk@comcast.net	City of Courtland		300 Railroad St Courtland MN, 56021 United States	Electronic Service		No	Official 25-15
26	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	Official 25-15
27	Darren	Saffert	lafoityclerk@gmail.com	City of Lafayette		700 Ninth St PO BOX 375 Lafayette MN, 56054 United States	Electronic Service		No	Official 25-15
28	Nizhoni	Smith	nizhoni.smith@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	Official 25-15
29	Rachel	Sorrentino	rachel@nwgas.com	Northwest Gas		801 Twelve Oaks Center Dr Ste 815B Wayzata MN, 55391 United States	Electronic Service		No	Official 25-15
30	J. Richard	Stermer	rstermer@stermerlaw.com	Stermer & Sellner, Chtd.		102 Parkway Drive P.O. Box 514 Montevideo MN, 56265 United States	Electronic Service		No	Official 25-15
31	Tim	Thompson	tthompson@lrec.coop	Lake Region Electric Cooperative		PO Box 643 1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	Official 25-15