

202 S. Main Street Le Sueur, MN 56058 Toll Free: (888) 931-3411 Fax (507) 665-2588 www.greatermngas.com

October 27, 2016

VIA ELECTRONIC FILING

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

RE: Petition for Change in Contract Demand Entitlement

Docket No. G022/M-16-522

Dear Mr. Wolf:

In its Petition filed previously in this docket, Greater Minnesota Gas, Inc. ("GMG") indicated that it intended to file an informational letter near November 1st identifying whether it proposed any changes to its original demand entitlement request. GMG is amending its request as discussed herein.

GMG has determined that it will not contract for the proposed incremental 350 dekatherms of daily capacity (Viking Forward Haul FT-Zone 1) that was contemplated in GMG's Petition herein. As of the writing of this letter, GMG is approximately 135 customers short of its goal for the year. The primary factor in the customer shortage is that Otter Tail County delayed a highway construction project; and, as a result, GMG's main extension to approximately 200 customers along the highway construction route is being delayed until next year when Otter Tail County expects to complete the highway project. Although GMG continues to sign up new customers, GMG expects that it will finish the year short of its goal, given the highway project delay.

Hence, GMG revised its demand entitlement request and now seeks an increase in total demand entitlement as follows:

Previous Entitlement	Revised Proposed Entitlement 2016-17 (Dth)	Entitlement Changes (Dth)	% Change From Previous Year
12,509	13,009	500	4.0%



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GMG revised its design day analysis based on its revised customer numbers; and, the slight shortfall in new customers resulted in a slightly decreased design day requirement. The table below shows GMG's revised design day and reserve calculations:

Planned Customer Base										
Revised Design Day Requirement	12,364	Dth								
Reserve Margin at 5.2%	645	Dth								
Design Day Requirement With 5.2% Reserve Margin	13,009	Dth								

For illustrative purposes, a revised Demand Profile and Supply Comparison, originally contained in Attachment B of GMG's Petition, is included below:

Revised Demand Profile and Supply Comparison

2015 - 2016 Heating Season	Quantity	Change in		2016 - 2017 Heating Season	Quantity	Change in
	(Dth)	Quantity (Dth)			(Dth)	Quantity (Dth)
TF 12 (Nov Oct.)	210	-		TF 12 (Nov Oct.)	210	-
TFX-7 (Oct Apr.)	665	-		TFX-7 (Oct Apr.)	665	-
TFX-5 (Nov Mar.)	6,344	-		TFX-5 (Nov Mar.)	6,344	-
TFX-5 (Nov Mar.)	90	-		TFX-5 (Nov Mar.)	90	-
(4) Viking Forward Haul/Emerson	1,400	-	(4)	Viking Forward Haul/Emerson	1,400	-
(5) Viking Forward Haul/Emerson	1,200	-	(5)	Viking Forward Haul/Emerson	1,200	-
FT-A Capacity Release - Non-recallable	2,600	2,600		FT-A Capacity Release - Non-recallable	2,600	-
(6) Delivery Contract	-	(950)				
			(7)	TF 12 (Nov Oct.)	500	500
(2) Viking Zone 1	2,000		(2)	Viking Zone 1	2,000	-
(3) TFX-1 (Purchased Oct. 2014)	1,000		(3)	TFX-1 (Purchased Oct. 2014)	1,000	
SMS	2,000	-		SMS	2,000	-
Heating Season Total Capacity	12,509	1,650		Heating Season Total Capacity	13,009	500
Non-Heating Season Total Capacity	210	-		Non-Heating Season Total Capacity	210	-
Total Entitlement @ Peak	12,509	1,650		Total Entitlement @ Peak	13,009	500
Total Annual Transportation	-	-		Total Annual Transportation	-	-
Total Season Transportation	12,509	1,650		Total Season Transportation	13,009	500
Total Percent Summer Vs. Winter	1.7%			Total Percent Summer Vs. Winter	1.6%	
Total Percent Seasonal	100.0%			Total Percent Seasonal	100.0%	

Notes:							
1/ Only items in bold affect capacity entit	ement level.						
2/ Transport only. Does not increase peak	day entitlem	ent.					
3/ 1,000 Dth of TFX purchased for October	, 2014 only to	repla	ace capacity loss due to Viking's Force Ma	ajeur. Does n	ot affect peak d	ay en	titlement.
4/ 1,400 Dth disrupted in October, 2014 or	nly due to Vik	ing F	orce Majeur				
5/ 1,200 Dth of FT-A purchased during Vik	ing open sea	son b	eginning February 1, 2015.				
6/ Company has contract for supply delive	red to TBS. N	lo der	nand Charges are applicable, but the 950D	th's are avail	able on peak da	y.	
7/ Company has secured 500 DKT of release	se capacity i	n Nor	thern Natural Gas Zone E-F effective July	1, 2016. The	capacity is pern	nanat	ely releasedto GMG and non recallable.
The capacity was available at Northern's	s existing tari	ff rate					



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GMG's revised request results in a drop in the proposed change in contract demand cost from the initially proposed total annual change of \$63,822.02 to a revised total annual change of \$45,465.50. As the revised illustrative PGA attached hereto demonstrates, the revised demand entitlement request continues to result in a rate decrease for GMG's customers.

Since the revised demand entitlement request will continue to provide for adequate supply to protect GMG's customers, along with slightly reducing customer rates, it strikes the best possible balance. Hence, GMG respectfully requests that the Commission approve its revised demand entitlement request.

GMG also takes this opportunity to advise the Commission regarding the service type change for one of its customers that GMG identified in its letter submitted in lieu of reply comments. GMG's largest customer receives retail service at some locations and transportation service at others. Recently, the customer transitioned some additional locations from retail to transportation service. The customer determined that the transition made sense for itself in terms of its own broader corporate plan in order to provide the customer with more contract flexibility. GMG and the customer developed a plan to provide for one year of recallable capacity release equal to the customer's proportionate amount of GMG's demand entitlement capacity. GMG believes that it is not prudent to permanently give up capacity; but, by providing capacity release on a recallable basis for one year with the customer paying the full rate, GMG's other customers are not jeopardized by the change. The mere fact of the transition does not impact GMG's current contract demand entitlement request; however, in the interest of transparency, GMG discussed the matter with Commission and Department staff and advises the Commission of the same.

All individuals identified on the attached service list have been electronically served with a copy of this letter. 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) 665-8657 and my email address is kanderson@greatermngas.com.

Sincerely,

GREATER MINNESOTA GAS, INC. /s/
Kristine A. Anderson
Corporate Attorney

cc: Service List

FOR ILLUSTRATIVE PURPOSES ONLY

Purchased Gas Adjustment (PGA) Calculation	Greater Minnesota Gas, Inc.									
The PAIR is based on the bisology Northern Natural Gas Tarells:		alculation								
This FPA is based on the following National Control Natural Class Tardills: **CREAM*** CHAPTA** **Execute** CHAPT	ruichaseu Gas Aujustillent (FGA) C	aicuiation								
### Class Sheet No. 50 ### Class Sheet No. 5	Effective date of implementation:	Natural gas us	age on and after	November 1, 2016						
### Class Sheet No. 50 ### Class Sheet No. 5	This PGA is based on the following Northern Na	tural Gas Tariffs:		This PGA is based on	the following Viking	Gas Transmi	ssion Co. Tariffs:			
Effective - 4/174										
Sile Research Color Colo	Issued: 1/31/14			Issued: 11/14/14						
Basuel 120914	Effective: 4/1/14			Effective: 01/01/1	5					
Effective: 00160315 Recited Shart No. 55 Recited Color Sol 14 Centerine: 001614 Recited Shart No. 50214 Recited	8th Revised Sheet No. 51									
1st Resides Shear No. 55	Issued: 12/04/14									
Bissuer (20114	Effective: 01/06/2015									
Effective 9/01/4	1st Revised Sheet No. 55									
Control Minnesots Gais, Rin State Coal of Gais	Issued: 6/30/14									
All Customer Sales Rate Classes - Demand MCE x. Months x. Turff Rate Equals Fame CCF Fame Internetible Fame CCF Fame Fame CCF Fame Fame CCF Fame Fa	Effective: 9/30/14									
All Customer Sales Rate Classes - Demand MCE x. Months x. Turff Rate Equals Fame CCF Fame Internetible Fame CCF Fame Fame CCF Fame Fame CCF Fame Fa										
All Customer Sales Rate Classes - Demand TEX. 7 300 7 \$5.6830 11,954 \$0.002773 \$0.002723 \$0.000528 \$0.000000 \$0.0000000 \$0.0000000000		of Gas			November 1	I, 2010				
IFK-7										
SASS Demand	All Customer Sales Rate Classes - Demand								Interruptible	
SMS Demand 50 7 \$2,1800 763 \$3,000077										
1,300 8 \$2,1900 22,672 \$0,005088										
Total Capacity Cost Rate Case 2009 Firm Sales Service Volume - CCF 4,303,890 S.089229 \$0,000000		SMS Demand								
Rate Case 2009 Firm Sales Service Volume - CCF			1,300	8	\$2.1800		22,672	\$0.005268		
Rate Clase 2009 Firm Sales Service Volume - CCF		Total Capacity C	Cost				\$356,916			
Demand Base Cost of Gas / CCF Subsect Su				V-I 205	4 000 05					
All Customer Sales Rate Classes - Commodity Rate Case Total Sales Service Volume - CCF Commodity Base Cost of Gas/CCF Rate Case Total Sales Service Volume - CCF Commodity Base Cost of Gas/CCF A1,775,650 S1,160,098 S1,160,098 S1,160,098 S1,160,098 S1,160,098 S1,160,098 S1,160,098 S1,160,098 S1,160,098 S1,1775,650 S1,					4,303,890			\$0.082929	\$0.000000	
All Classes Commodity Sales Service Volume - CCF Commodity Base Cost of Gas/CCF Sales Service Volume - CCF Sales Service V			loot or odo / oor					\$0.002020	ţ0.00000	
Rate Case Total Sales Service Volume - CCF	All Customer Sales Rate Classes - Commod		modity				\$ 2.808.142			
Commodity Base Cost of Gas/CCF \$3,165,058 \$3,050913 \$0,588013 \$0,588				olume - CCF	4.775.650		<u> </u>			
Annual Sales Volume - 2009 Rate Case Sales Service Volume - CCF Sales Service Volume - CCF Interruptible Service Volume - CCF III. Greater Minnesota Gas, Inc. Rates - Current Cost of Gas Effective Commodity Cost of Gas					1,170,000			\$0.588013	\$0.588013	
Annual Sales Volume - 2009 Rate Case Sales Service Volume - CCF Seles Senice Volume - CCF Interruptible Service Volume - CCF III. Greater Minnesota Gas, Inc. Rates - Current Cost of Gas Effective Commodity Cost of Gas III. Annual Sales Volume - 2016-2017 Budget (September - August) Adjusted for growth in sales for 2016-2017 Sales Senice Volume - CCF Interruptible Service Volume - CCF Interruptible Service Volume - CCF All Customer Sales Rate Classes Viking Zone 1 1,000 12 1,000 12 1,000 12 1,000 12 1,000 12 1,000 13 1,000 10 10 10 10 10 10 10 10		Total Base Cost	of Gas/CCE				\$3 165 058	\$0.670942	\$0.588013	
Sales Service Volume - CCF		Total base cost of cas/col				-	\$3,103,038	\$0.070942	\$0.366013	
Interruptible Service Volume - CCF	Annual Sales Volume - 2009 Rate Case Sale	s Service Volum	ne - CCF		4,775,650					
III. Greater Minnesota Gas, Inc. Rates - Current Cost of Gas Effective November 1, 2016 S0.290300 WACOG	Sales Service Volume - CCF			4,303,890						
III. Annual Sales Volume - 2016-2017 Budget (September - August) Adjusted for growth in sales for 2016-2017	Interruptible Service Volume - CCF			471,760						
III. Annual Sales Volume - 2016-2017 Sales Service Volume - CCF 12,201,500 Interruptible Service Volume - CCF Interruptible Service Volume - CC	II. Greater Minnesota Gas. Inc. Rates - Curre	ent Cost of Gas E	ffective		Nover	nber 1. 2016				
III. Annual Sales Volume - 2016-2017 Budget (September - August) Adjusted for growth in sales for 2016-2017 12,201,500 1,528,500	,					,				
Sales Service Volume - CCF		Commodity Cos	t of Gas				\$0.290300 V	/ACOG		
Sales Service Volume - CCF			L August) Adjusted	d for growth in sales	13 730 000					
Interruptible Service Volume - CCF				12 201 500	10,700,000					
MCF										
MCF										
All Customer Sales Rate Classes	IV. Greater Minnesota Gas, Inc.'s - Current	Cost of Gas Effec	tive		Nover	mber 1, 2016			Poto/CCF	
Viking Zone 1 2,000 12 \$4.3706 \$104,894 \$0.008597 Viking Zone 1 1,400 12 \$4.3706 \$73,426 \$0.006018 Viking Zone 1 1,200 12 \$4.3706 \$62,937 \$0.005158 TFX - 5 6,344 5 \$15.1530 \$480,653 \$0.039393 TF - 12 181 5 \$10,2300 \$9,258 \$0.000759 TF - 12 181 7 \$5.6830 \$7,200 \$0.000590 TF - 12 29 5 \$10,2300 \$1,483 \$0.000122 TF - 12 29 7 \$5.6830 \$1,154 \$0.000095 TF - 5 90 5 \$15.1530 \$6,819 \$0.00059 TFX - 7 665 5 \$15.1530 \$6,819 \$0.00059 TFX - 7 665 5 \$15.1530 \$0.384 \$0.004129 TFX - 7 665 2 \$5.6830 \$7,558 \$0.000619 FT-A 2,600 12 \$5.	All Customer Sales Pata Classes		MCE	v Montho	v Tariff Poto		Faualc	Firm		Gen Inter
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Current Commodity Cost of Gas/CCF % of Total 79% \$3,985,819 \$0.290300 \$0.290300 \$0.290300		IF - 12	500	/	\$5.6830		\$19,891	\$0.001630		
		Current Demand	Cost of Gas				\$1,030,302	\$0.084441	\$0.000000	\$0.00000
		Current Commod	dity Cost of Gas/	CCF	% of Total	79%	\$3,985,819	\$0.290300	\$0.290300	\$0.29030
		Total Cost of Ga					\$5,016,121	\$0.374741	\$0.290300	\$0.29030

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Summary of Cost												
All Customer Sales Rate Classes (/CCF)												
•												
		Fi	rm Sales			Agricultura	I Interruptible			General Ir	nterruptible	
	Total	Total			Total	Total		Total Total				
	Demand	Commodity	True-up	Total	Demand	Commodity	True-up	Total	Demand	Commodity	True-up	Total
1) Base Rate	\$0.082929	\$0.588013	\$0.000000	\$0.670942	\$0.000000	\$0.588013	\$0.000000	\$0.588013	\$0.000000	\$0.588013	\$0.000000	\$0.588013
2) Prior PGA	\$0.008465	(\$0.387713)	(\$0.004770)	(\$0.384018)	\$0.000000	(\$0.387713)	\$0.021340	(\$0.366373)	\$0.000000	(\$0.387713)	\$0.000400	(\$0.387313
3) Current Adj	(\$0.008008)	(\$0.005030)	\$0.000000	(\$0.013038)	\$0.000000	(\$0.005030)	\$0.000000	(\$0.005030)	\$0.000000	(\$0.005030)	\$0.000000	(\$0.005030
4) PGA Billed (2+3)	\$0.000457	(\$0.392743)	(\$0.004770)	(\$0.397056)	\$0.000000	(\$0.392743)	\$0.021340	(\$0.371403)	\$0.000000	(\$0.392743)	\$0.000400	(\$0.392343
5) Average Cost of Gas	\$0.083386	\$0.195270	(\$0.004770)	\$0.273886	\$0.000000	\$0.195270	\$0.021340	\$0.216610	\$0.000000	\$0.195270	\$0.000400	\$0.195670
	Prior Cumulative Adjustments	Demand & Commodity Change Filed Herein	True-up Adjustment Factor Change Eff. September 1, 2014 (G022/AA-14)	Current PGA Adjustment								
All Firm Sales Rate Classes (/CCF)	(\$0.379248)	(\$0.013038)	(\$0.004770)	(\$0.397056)								
Ag Inter. Sales Rate Classes (/CCF)	(\$0.387713)	(\$0.005030)	\$0.021340	(\$0.371403)								
Gen. Inter. Sales Rate Classes (/CCF)	(\$0.387713)	(\$0.005030)	\$0.000400	(\$0.392343)								
		1	2	3	4	5	7					
November 1, 2016	Tariff	Non-gas	Commodity	Demand	Total Cost	True-up	Total					
	Rate	Commodity	Cost	Other PGA	of Gas	Factor	Billing					
	Designation	Margin	(\$/CCF)	Expenses	(\$/CCF)	(\$/CCF)	Rate					
Rate Class		(\$/CCF)	(4: 2 2: 7	(\$/CCF)	(2)+(3)+(4)	(0.22.)	(\$/CCF)					
Residential	RS1	\$0.444330	\$0.195270	\$0.083386	\$0.278656	(\$0.004770)	\$0.718216					
Small Commercial CS1	SCS1	\$0.426330	\$0.195270	\$0.083386	\$0.278656	(\$0.004770)	\$0.700216					
Commercial CS1	CS1	\$0.396330	\$0.195270	\$0.083386	\$0.278656	(\$0.004770)	\$0.670216					
Commercial/Industrial MS1	MS1	\$0.376330	\$0.195270	\$0.083386	\$0.278656	(\$0.004770)	\$0.650216					
Commercial/Industrial LS1	LS1	\$0.361330	\$0.195270	\$0.083386	\$0.278656	(\$0.004770)	\$0.635216					
Agricultural - Interruptible	AG1	\$0.231310	\$0.195270	\$0.000000	\$0.195270	\$0.021340	\$0.447920					
General Interruptible	IND1	\$0.251310	\$0.195270	\$0.000000	\$0.195270	\$0.000400	\$0.446980					
General Interruptible - Flex	IND1 - FL	\$0.030000	\$0.195270	\$0.000000	\$0.195270	\$0.000400	\$0.225670					