

NOTICE OF COMMENT PERIOD

Issued: January 31, 2024

In the Matter of Great Plains' Natural Gas Co.'s Petition for Approval of a New Rate Schedule "Renewable Natural Gas Producer Access and Interconnection Service Rate 87"

PUC Docket Number(s): **G004/M-24-73**

Comment Period: Initial comment period closes March 8, 2024 at 4:30pm

Reply comment period closes March 22, 2024 at 4:30pm

Comments received after the close of the comment period may or may not be considered by the Commission.

Issue: Should the Commission approve, modify, or reject Great Plains' Natural Gas Co.'s new rate schedule for RNG producers?

Topic(s) Open for Comment:

- Should the Commission approve, modify, or reject Great Plains' new rate schedule, "Renewable Natural Gas Producer Access and Interconnection Service Rate 87"?
- How should the Commission consider Great Plains' proposal within the context of other renewable natural gas (RNG)-related dockets?¹
- How should the Commission consider Great Plains' proposal within the context of statewide greenhouse gas reduction goals, as stated in Minn. Stat §216H.02 Subd. 1?
- How should the Commission consider lessons learned from other dockets, such as Docket No. G999/CI-21-566 regarding Lifecycle Greenhouse Gas Emissions Accounting for natural gas innovation plans under Minn. Stat. § 216B.2427, to assess Great Plains' petition?
- How should the Commission consider Great Plains' proposal in the context of the evolving RNG market nationally?
- Has Great Plains appropriately discussed its plans to maximize the benefits of the Inflation Reduction Act (IRA) and the IRA's impact on the utility's planning assumptions pursuant to

¹ For example, CenterPoint Energy's RNG Interconnection Tariff in Docket G008/M-20-434, Minnesota Energy Resource Corporation's RNG Interconnection Tariff in Docket G011/M-23-489, CenterPoint Energy's Natural Gas Innovation Act petition in Docket G008/M-23-215, and Xcel Energy's Natural Gas Innovation Act petition in Docket G002/M-23-518. Staff notes that, as of its compliance filing on January 31, 2023, CenterPoint has not facilitated a successful RNG interconnection since approval of their petition in 2021, citing a longer-than-expected interconnection process.

Order Point 1 of the Commission’s September 12, 2023 Order in Docket No. E,G-999/CI-22-624?

- Are there other issues or concerns related to this matter?

Background

Great Plains Natural Gas Co. (“Great Plains”) is a natural gas utility serving approximately 22,400 Minnesota customers. On January 12, 2024, Great Plains filed a petition for approval of a new rate schedule, “Renewable Natural Gas Producer Access and Interconnection Service Rate 87.” In this petition, Great Plains seeks to implement a new tariff for producers of renewable natural gas (RNG) who wish to interconnect to Great Plains’ gas distribution system.

The Company does not include the specifics of its commodity purchase plans in its petition, nor does it provide its proposed interconnection agreement, but focuses on the fee-based cost to the RNG producers to interconnect, including an Access Fee, Access Commodity Charge, and Maintenance Fee. In the petition, Great Plains states that the RNG producer will pay for any interconnection costs, including valves, meters, and gas quality measurement, which will therefore exclude the interconnection costs from its rate base. Great Plains has stated that they are responding to the desire of local RNG producers to interconnect to its distribution system, and that further development of this process may help the state advance its environmental goals.

Staff notes that Great Plains is one of several Minnesota gas utilities currently seeking to interconnect RNG with their distribution systems, and that RNG-related issues are being discussed in other dockets currently before the Commission as noted in the footnote above. Staff requests parties consider how RNG is used by Minnesota distribution gas utilities broadly when assessing Great Plains’ application.

Filing Requirements: Utilities, telecommunications carriers, official parties, and state agencies are **required** to efile documents using the Commission’s electronic filing system (eFiling). All parties, participants, and interested persons are encouraged to use eFiling at:

<https://www.edockets.state.mn.us/EFiling>

Submit Public Comments:

Online: <https://mn.gov/puc/get-involved/public-comments/>, and follow the instructions.

Email: consumer.puc@state.mn.us

U.S. Mail: Consumer Affairs Office
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul MN 55101

Full Case Record: See all documents filed in this matter on the Commission's website at: mn.gov/puc/edockets, select *Go to eDockets Project Database*, enter the year (24) and the docket number (73), and select *Search*.

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Questions about this docket or Commission process and procedure? Contact Commission staff, Sophie Nikitas, at sophie.nikitas@state.mn.us or 651-539-1062.

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To request this document in another format such as large print or audio, call 651-296-0406 (voice). Consumers with a hearing or speech impairment may call using their preferred Telecommunications Relay Service or email consumer.puc@state.mn.us for assistance.

CERTIFICATE OF SERVICE

I, Mai Choua Xiong, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

Minnesota Public Utilities Commission NOTICE OF COMMENT PERIOD

Docket Number **G004/M-24-73**

Dated this 31st day of January, 2024

/s/ Mai Choua Xiong

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Patrick	Serfass	info@americanbiogasCouncil.org	American Biogas Council	1211 Connecticut Ave NW Ste 650 Washington, DC 20036	Electronic Service	No	OFF_SL_21-565_Official Service List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-434_Official Service List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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	Yes	OFF_SL_20-434_Official Service List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Matthew	Tomich	tomich@energy-vision.org	Energy Vision	138 E 13th St New York, NY 10003	Electronic Service	No	OFF_SL_20-434_Official Service List
Jessica	Tritsch	jessica.tritsch@sierraclub.org	Sierra Club	2327 E Franklin Ave Minneapolis, MN 55406	Electronic Service	No	OFF_SL_20-434_Official Service List
Sam	Wade	sam@rngcoalition.com	Coalition for Renewable Natural Gas	1017 L Street #513 Sacramento, CA 95814	Electronic Service	No	OFF_SL_20-434_Official Service List

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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	Yes	OFF_SL_23-489_M-23-489
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Joylyn C	Hoffman Malueg	Joylyn.hoffmanmalueg@wecenergrygroup.com	Minnesota Energy Resources	2685 145th St W Rosemount, MN 55068	Electronic Service	No	OFF_SL_23-489_M-23-489
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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	Yes	OFF_SL_23-489_M-23-489
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Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_23-489_M-23-489
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Wendy	Merrill	wendy.merrill@millelacsband.com	Mille Lacs Band of Ojibwe	N/A	Electronic Service	No	SPL_SL__Tribal Government Contacts
Valentina	Mgeni	Valentina.Mgeni@piic.org	Prairie Island Indian Community	Prairie Island Indian Community 5636 Sturgeon Lake Road Welch, MN 55089	Electronic Service	No	SPL_SL__Tribal Government Contacts
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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