



*A Division of Montana-Dakota Utilities Co.*

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September 9, 2025

Mr. Mike Bull  
Deputy Executive Secretary  
Minnesota Public Utilities Commission  
121 East Seventh Place, Suite 350  
St. Paul, MN 55101-2147

RE: In the Matter of a Commission Evaluation of Changes to Natural Gas Utility  
Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction  
Goals - Supplemental Comments  
Docket No. G999/CI-21-565

Dear Mr. Bull:

Great Plains Natural Gas Co. (Great Plains), a Division of Montana-Dakota Utilities Co., herewith electronically files its Supplemental Comments in the above referenced docket.

On May 5, 2025, the Minnesota Public Utilities Commission (Commission) issued a Notice of Comment Period requesting comments be filed in the above referenced docket addressing the issue of “[w]hat action(s), if any, should the Commission take to modify existing gas line extension policies for rate regulated gas utilities”.

On July 8, 2025, several parties submitted written comments, with some specifically addressing the topics outlined above and others a more general discussion and/or recommendations surrounding future actions the Commission should consider on gas utilities’ extension policies when considering Minnesota’s greenhouse gas emission reduction goals enacted by the Minnesota Legislature in 2021.

On August 8, 2025, several parties, including Great Plains, submitted reply comments. Some commentors specifically addressed issues discussed in the July 8 comments, while others voiced their continued support and position from earlier comments.

Following the August 8 comments, Great Plains continues to support no modifications to the Company’s line extension policies within the immediate docket. Any modifications to a gas utility’s line extension policy, along with the topics and policy questions required in Docket No. G999/CI-90-563, should continue to be presented and addressed within a utility rate case. This current forum best acknowledges each utility’s individual service area and circumstances while also providing the Commission with additional information through the topics and policy questions required by

Commission order to ensure existing customers are not harmed by new customers being added to the gas distribution system. Additionally, this forum provides the opportunity to validate that each gas utility is administering its extension policy in accordance with their approved tariff while also meeting any Commission's objectives.

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  
Vice President of Regulatory Affairs

cc: Kristin Stastny