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July 13, 2017

**VIA ELECTRONIC FILING**

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

RE: Gas Affordability Program Annual Report for 2016  
Docket No. G022/M-17/234

Dear Mr. Wolf:

Greater Minnesota Gas, Inc. ("GMG") filed its P216 Gas Affordability Program Annual Report on March 30, 2017. The Minnesota Department of Commerce, Division of Energy Resources ("the Department") filed its Comments on June 26, 2017. This letter serves as GMG's Reply, in lieu of filing Reply Comments.

GMG appreciates the Department's recommendation that the Commission approve its request because GMG complied with all filing requirements. The Department noted in its Comments that GMG performed one mathematical equation using a different denominator from the other utilities and requested that GMG utilize the same equation format. As set forth in GMG's Annual Report, GMG had 77 LIHEAP customers during 2016, of which 18 participate in GAP at some point during the year. That means that 59 customers were non-GAP LIHEAP customers. GMG's Annual Report noted that 5 non-GAP LIHEAP customers were disconnected. The Department's Comments requested that GMG use the non-GAP LIHEAP customers (59) as the denominator to determine the rate of customer disconnection, rather than using the total firm customers as was contained in the report. Therefore, GMG submits that the rate of disconnection for non-GAP LIHEAP customers is 5/59 using non-GAP LIHEAP customers as the denominator, or approximately 8%.

Thank you. Please do not hesitate to contact me should there be any questions or concerns.

Sincerely,

**GREATER MINNESOTA GAS, INC.**

/s/

Kristine A. Anderson  
Corporate Attorney

Enclosure  
cc: Service List