



*A Division of Montana-Dakota Utilities Co.*

705 West Fir Avenue  
Mailing Address: PO Box 176  
Fergus Falls, MN 56538-0176  
1-877-267-4764  
www.gpng.com

October 10, 2025

Ms. Sasha Bergman  
Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
St. Paul, MN 55101-2147

**Re: Reply Comments in the Matter of a Commission Review of Utility  
Performance Incentives for Energy Conservation  
Docket No. E,G999/CI-08-133**

Dear Ms. Bergman,

Great Plains Natural Gas Co. (Great Plains), a Division of Montana-Dakota Utilities Co., herewith electronically submits its Reply Comments to the Minnesota Public Utilities Commission (Commission) in response to the Joint Reply Comments filed September 15, 2025, filed in the Matter of a Commission Review of Utility Performance Incentives for Energy Conservation.

Great Plains supports the Joint Commenters proposal to approve a 2027-2029 Shared Savings DSM Financial Incentive Mechanism. Great Plains' agrees with the recommendation to the changes proposed for the insulation and air sealing first-year energy savings to use utility-specific program potential values to set the threshold and goal rather than a utility-wide metric. Great Plains would have challenges meeting the achievement threshold and goal as originally proposed.

Great Plains appreciates the opportunity to provide these comments on the joint proposal by the Department, CEE, and Fresh Energy to modify the Shared Savings DSM Financial Incentive Mechanism for implementation during the 2027-2029 Triennial period.

If you have any questions regarding this filing, please contact me 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  
Service List