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October 9, 2019

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: Proposed Tariff Change to CCRA
Docket No. _____

Dear Mr. Wolf:

Attached hereto, please find Greater Minnesota Gas, Inc.'s Gas Petition for Tariff Change to CCRA, along with the requisite Summary of Filing, for filing in a new docket.

All individuals identified on the attached service list have been electronically served with the same.

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) 209-2110 and my email address is kanderson@greatermngas.com.

Sincerely,

GREATER MINNESOTA GAS, INC.

/s/
Kristine A. Anderson
Corporate Attorney

Enclosure

cc: Service List

CERTIFICATE OF SERVICE

I, Kristine Anderson, hereby certify that I have this day served a true and correct copy of the following document to all persons at the addresses indicated on the attached list by electronic filing, electronic mail, or by depositing the same enveloped with postage paid in the United States Mail at Faribault, Minnesota:

**Greater Minnesota Gas, Inc.'s Petition for
Tariff Change to CCRA and Summary of Filing
Docket No. _____**

filed this 9th of October, 2019.

/s/ Kristine A. Anderson
Kristine A. Anderson, Esq.
Corporate Attorney
Greater Minnesota Gas, Inc.

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.	1900 Cardinal Lane P.O Box 798 Faribault, MN 55021	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2019
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2019
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2019
Brian	Gardow	bgardow@greatermngas.com	Greater Minnesota Gas, Inc.	PO Box 68 Le Sueur, MN 56058	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2019
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.	202 South Main Street P.O. Box 68 Le Sueur, MN 56058	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2019
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.	PO Box 68 202 South Main Street Le Sueur, MN 56058	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2019
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	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2019
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2019

**STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

Katie Sieben
Dan Lipschultz
Valerie Means
Matt Schuerger
John Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

Docket No. _____

In the Matter of Greater Minnesota
Gas, Inc.'s Conservation Improvement
Program Conservation Cost Recovery
Adjustment Tariff Change

SUMMARY OF FILING

Please take notice that on October 9, 2019, Greater Minnesota Gas, Inc. (GMG) filed a Petition for Tariff Change to CCRA with the Minnesota Public Utilities Commission pursuant to Commission Rules. The Petition seeks to reduce GMG's Conservation Cost Recovery Adjustment from \$0.18 per Dth to \$0.03 per Dth effective January 1, 2020..

Dated: October 9, 2019

Respectfully submitted,

/s/ Kristine A. Anderson
Kristine A. Anderson
Corporate Attorney
Greater Minnesota Gas, Inc.
202 S. Main Street
Le Sueur, MN 56068
Phone: 888-931-3411

**STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

Katie Sieben
Dan Lipschultz
Valerie Means
Matt Schuerger
John Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

Docket No. _____

In the Matter of Greater Minnesota
Gas, Inc.'s Conservation Improvement
Program Conservation Cost Recovery
Adjustment Tariff Change

**PETITION FOR
TARIFF CHANGE TO CCRA**

Greater Minnesota Gas, Inc. (GMG), hereby submits a proposed revision of its Conservation Improvement Program Cost Recovery tariff provisions (CIP Rider). This proposal provides a timeline and proposed reduction in GMG's Conservation Cost Recovery Adjustment (CCRA) contained in its tariff provisions.

SUMMARY OF FILING

Pursuant to Minnesota Rule Part 7829.1300, Subpart 1, a one-paragraph summary of this filing, sufficient to apprise potentially interested parties of its nature and general content, accompanies this Petition.

SERVICE ON REQUIRED AND INTERESTED PARTIES

Pursuant to Minnesota Rule Part 7829.1300, Subpart 2, GMG served a copy of this Report on the Residential Utilities Division of the Office of the Attorney General. Pursuant to Minnesota Rule Part 7825.2840, GMG served the Summary of Filing and Notice of Availability of Report on all parties reflected on the accompanying Certificate of Service and Service List.

GENERAL FILING INFORMATION

Pursuant to Minnesota Rule Part 7829.1300, Subpart 3, the following specific content is provided:

A. Name, Address and Telephone Number of the Utility

Greater Minnesota Gas, Inc.
1900 Cardinal Lane
P.O. Box 798
Faribault, MN 55021
Telephone: (888) 931-3411

B. Name, Address and Telephone Number of the Attorney for Utility

Kristine A. Anderson
Corporate Attorney
Greater Minnesota Gas, Inc.
1900 Cardinal Lane
P.O. Box 798
Faribault, MN 55021
Telephone: (888) 931-3411

C. Date of Filing and Proposed Effective Date of Rate Change

Date Filed: October 9, 2019
Proposed Effective Date: January 1, 2020

D. Statute Controlling Time Frame for Processing Filing

Minn. Stat. § 216B.16, subd. 1, permits a utility to place a rate change into effect subsequent to 60 days' notice to the Commission, unless the rate change is suspended under Minn. Stat. 216B.16, subd. 2. Further, Minn. Stat. § 216B.16, subd. 6b and subd. 6c allow public utilities to file rate schedules providing for annual recovery of actual conservation costs and approved incentives. Under Minn. R. 7829.0100, subp. 11, this Petition constitutes a miscellaneous filing because no determination of the Company's general revenue requirements is necessary. Minn. R. 7829.1400, subp. 1, permits initial comments on miscellaneous filings to be made within 30 days of filing and reply comments 10 days thereafter.

E. Utility Employee Responsible for this Filing (and Signature):

/s/ Kristine A. Anderson
Kristine A. Anderson, Esq.
Corporate Attorney

DISCUSSION

GMG sought to add a CIP Rider to its tariff beginning January 1, 2017. The Commission approved implementation of a CCRA with a beginning rate of \$0.18 per Dth. That amount was determined to be appropriate for GMG to recover its CIP costs and its existing tracker shortfall. GMG agreed that it would leave that rate in place, and would not seek carrying charges, for a period of three years.

Since GMG has recovered its shortfall and the CCRA has remained consistent for three years, GMG proposes that its CCRA be reduced beginning in 2020. Thereafter, consistent with the Commission's directive, GMG will file annual tracker information and seek any necessary CCRA rate changes to assure that the CCRA is reasonable and appropriate for both GMG and its ratepayers.

GMG's CIP tracker activity and anticipated balance as of December 31, 2019 is attached as Exhibit A. GMG's projected tracker based on its currently approved CIP plan and its proposed decrease to the CCRA is attached as Exhibit B. GMG's proposed tariff language, attached

hereto as Exhibit C, reflects an adjusted CCRA of \$0.03 per Dth. GMG respectfully requests Commission approval to implement the new rate as of January 1, 2020.

REQUEST FOR COMMISSION ACTION

GMG recognizes that Minnesota encourages energy efficiency and that it plays an important role in encouraging its customers to maximize their energy efficiency efforts. GMG believes that this proposal is a balanced one that, by matching conservation expenses with recovery, takes into consideration the needs of both consumers and the utility. Hence, GMG respectfully requests that the Commission approve the proposed change to its CIP Rider reflecting a CCRA of \$0.03 per Dth effective January 1, 2020 as reflected on the attached proposed tariff sheets.

Dated: October 9, 2019

Respectfully submitted,

/s/ Kristine A. Anderson
Kristine A. Anderson
Corporate Attorney
Greater Minnesota Gas, Inc.
202 S. Main Street
Le Sueur, MN 56068
Phone: 888-931-3411

Exhibit A
CIP Tracker through December 31, 2019

Greater Minnesota Gas														
CIP Tracker and Balance														
2017 (CCRA set to 0.18)														
		Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Annual
	Expenses	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Summary
1	Beginning Balance- Under/(Over) Recovered	270,706	240,993	206,121	177,724	177,756	164,782	161,198	157,390	151,234	151,670	150,298	108,542	270,706
2	CIP Expenses	20,526	6,700	6,650	23,733	2,500	6,107	3,452	5,375	10,973	15,329	8,085	50,834	160,264
3	Financial Incentive													
4	Additional Adjustments													
5	Total Balance, Expenses, Adjustments, Incentive (Lines 1+2+3+4)	291,232	247,693	212,771	201,457	180,256	170,889	164,650	162,765	162,207	166,999	158,383	159,376	430,970
	Recoveries													
6	Total Sales (MCF)	236,977	194,773	165,377	110,403	71,363	44,143	33,106	52,458	48,065	78,211	231,928	250,495	1,517,299
7	CIP-Exempt Sales (MCF)	9,961	6,920	7,009	3,303	1,441	351	298	355	448	2,743	6,710	10,620	50,159
8	Total CIP-Applicable Sales (MCF) (Line 6 - Line 7)	227,016	187,853	158,368	107,100	69,922	43,792	32,808	52,103	47,617	75,468	225,218	239,875	1,467,140
9	Base Rate (CCRC) (\$/Dth)	0.0413	0.0413	0.0413	0.0413	0.0413	0.0413	0.0413	0.0413	0.0413	0.0413	0.0413	0.0413	
10	Base Rate (CCRC) Recovery (\$) (Line 8*Line 9)	(9,376)	(7,758)	(6,541)	(4,423)	(2,888)	(1,809)	(1,355)	(2,152)	(1,967)	(3,117)	(9,302)	(9,907)	(60,593)
11	Adjustment Factor (CCRA) (\$/Dth)	0.18	0.18	0.18	0.18	0.18	0.18	0.18	0.18	0.18	0.18	0.18	0.18	
12	Adjustment Factor (CCRA) Recovery (\$) (Line 8 * Line 11)	(40,863)	(33,814)	(28,506)	(19,278)	(12,586)	(7,883)	(5,905)	(9,379)	(8,571)	(13,584)	(40,539)	(43,178)	(264,085)
13	Total Recoveries (\$) (Lines 10 + 12)	(50,239)	(41,572)	(35,047)	(23,701)	(15,474)	(9,691)	(7,260)	(11,530)	(10,538)	(16,701)	(49,841)	(53,084)	(324,678)
	Carrying Charges													
14	Sub-Balance (\$) (Lines 5 + 13)	240,993	206,121	177,724	177,756	164,782	161,198	157,390	151,234	151,670	150,298	108,542	106,292	106,292
15	Carrying Charge Rate													
16	Carrying Charges (\$) (Line 14 * Line 15)													
17	Ending Tracker Balance (\$) - Under/(Over) Recovered (Lines 14 + 16)	240,993	206,121	177,724	177,756	164,782	161,198	157,390	151,234	151,670	150,298	108,542	106,292	106,292

Greater Minnesota Gas														
CIP Tracker and Balance														
2018														
		Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Annual
	Expenses	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Summary
1	Beginning Balance- Under/(Over) Recovered	106,292	59,370	20,150	(6,480)	(33,048)	(40,250)	(44,553)	(40,584)	(42,440)	(39,922)	(48,710)	(79,134)	106,292
2	CIP Expenses	15,506	14,328	11,122	10,287	9,357	6,326	11,807	8,027	15,596	24,778	18,956	42,949	189,039
3	Financial Incentive													
4	Additional Adjustments													
5	Total Balance, Expenses, Adjustments, Incentive (Lines 1+2+3+4)	121,798	73,698	31,272	3,807	(23,691)	(33,924)	(32,746)	(32,557)	(26,844)	(15,144)	(29,754)	(36,185)	295,331
	Recoveries													
6	Total Sales (MCF)	293,473	252,310	177,869	172,125	75,573	48,444	35,737	44,981	59,982	156,105	231,438	248,873	1,796,910
7	CIP-Exempt Sales (MCF)	11,376	10,341	7,275	5,587	748	412	319	325	883	4,429	8,301	9,331	59,327
8	Total CIP-Applicable Sales (MCF) (Line 6 - Line 7)	282,097	241,969	170,594	166,538	74,825	48,032	35,418	44,656	59,099	151,676	223,137	239,542	1,737,583
9	Base Rate (CCRC) (\$/Dth)	0.0413	0.0413	0.0413	0.0413	0.0413	0.0413	0.0413	0.0413	0.0413	0.0413	0.0413	0.0413	
10	Base Rate (CCRC) Recovery (\$) (Line 8*Line 9)	(11,651)	(9,993)	(7,046)	(6,878)	(3,090)	(1,984)	(1,463)	(1,844)	(2,441)	(6,264)	(9,216)	(9,893)	(71,762)
11	Adjustment Factor (CCRA) (\$/Dth)	0.18	0.18	0.18	0.18	0.18	0.18	0.18	0.18	0.18	0.18	0.18	0.18	
12	Adjustment Factor (CCRA) Recovery (\$) (Line 8 * Line 11)	(50,777)	(43,554)	(30,707)	(29,977)	(13,469)	(8,646)	(6,375)	(8,038)	(10,638)	(27,302)	(40,165)	(43,118)	(312,765)
13	Total Recoveries (\$) (Lines 10 + 12)	(62,428)	(53,548)	(37,752)	(36,855)	(16,559)	(10,629)	(7,838)	(9,882)	(13,079)	(33,566)	(49,380)	(53,011)	(384,527)
	Carrying Charges													
14	Sub-Balance (\$) (Lines 5 + 13)	59,370	20,150	(6,480)	(33,048)	(40,250)	(44,553)	(40,584)	(42,440)	(39,922)	(48,710)	(79,134)	(89,196)	(89,196)
15	Carrying Charge Rate													
16	Carrying Charges (\$) (Line 14 * Line 15)													
17	Ending Tracker Balance (\$) - Under/(Over) Recovered (Lines 14 + 16)	59,370	20,150	(6,480)	(33,048)	(40,250)	(44,553)	(40,584)	(42,440)	(39,922)	(48,710)	(79,134)	(89,196)	(89,196)

Greater Minnesota Gas														
CIP Tracker and Balance														
2019														
		Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Annual
	Expenses	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Projected	Projected	Projected	Projected	Projected	Summary
1	Beginning Balance- Under/(Over) Recovered	(89,196)	(79,414)	(127,725)	(163,405)	(178,764)	(182,586)	(174,223)	(177,777)	(181,629)	(176,587)	(180,356)	(205,616)	(89,196)
2	CIP Expenses	67,972	17,302	16,859	17,365	16,036	19,685	4,457	5,000	15,000	25,000	19,000	43,000	266,676
3	Financial Incentive													
4	Additional Adjustments													
5	Total Balance, Expenses, Adjustments, Incentive (Lines 1+2+3+4)	(21,224)	(62,112)	(110,866)	(146,040)	(162,728)	(162,901)	(169,766)	(172,777)	(166,629)	(151,587)	(161,356)	(162,616)	177,480
	Recoveries													
6	Total Sales (MCF)	275,550	308,021	245,892	152,450	91,923	51,627	36,522	40,300	45,900	134,400	208,300	259,300	1,850,185
7	CIP-Exempt Sales (MCF)	12,605	11,529	8,485	4,577	2,189	464	324	300	900	4,400	8,300	9,300	63,373
8	Total CIP-Applicable Sales (MCF) (Line 6 - Line 7)	262,945	296,492	237,407	147,873	89,734	51,163	36,198	40,000	45,000	130,000	200,000	250,000	1,786,812
9	Base Rate (CCRC) (\$/Dth)	0.0413	0.0413	0.0413	0.0413	0.0413	0.0413	0.0413	0.0413	0.0413	0.0413	0.0413	0.0413	
10	Base Rate (CCRC) Recovery (\$) (Line 8*Line 9)	(10,860)	(12,245)	(9,805)	(6,107)	(3,706)	(2,113)	(1,495)	(1,652)	(1,859)	(5,369)	(8,260)	(10,325)	(73,795)
11	Adjustment Factor (CCRA) (\$/Dth)	0.18	0.18	0.18	0.18	0.18	0.18	0.18	0.18	0.18	0.18	0.18	0.18	
12	Adjustment Factor (CCRA) Recovery (\$) (Line 8 * Line 11)	(47,330)	(53,369)	(42,733)	(26,617)	(16,152)	(9,209)	(6,516)	(7,200)	(8,100)	(23,400)	(36,000)	(45,000)	(321,626)
13	Total Recoveries (\$) (Lines 10 + 12)	(58,190)	(65,614)	(52,538)	(32,724)	(19,858)	(11,322)	(8,011)	(8,852)	(9,959)	(28,769)	(44,260)	(55,325)	(395,421)
	Carrying Charges													
14	Sub-Balance (\$) (Lines 5 + 13)	(79,414)	(127,725)	(163,405)	(178,764)	(182,586)	(174,223)	(177,777)	(181,629)	(176,587)	(180,356)	(205,616)	(217,941)	(217,941)
15	Carrying Charge Rate													
16	Carrying Charges (\$) (Line 14 * Line 15)													
17	Ending Tracker Balance (\$) - Under/(Over) Recovered (Lines 14 + 16)	(79,414)	(127,725)	(163,405)	(178,764)	(182,586)	(174,223)	(177,777)	(181,629)	(176,587)	(180,356)	(205,616)	(217,941)	(217,941)

Exhibit B
Projected CIP Tracker for 2020-21 at Adjusted Rate

		2020	2021
	Expenses	Projected	Projected
1	Beginning Balance- Under/(Over) Recovered	(217,941)	(84,779)
2	CIP Expenses	260,000	260,000
3	Financial Incentive		
4	Additional Adjustments		
5	Total Balance, Expenses, Adjustments, Incentive (Lines 1+2+3+4)	42,059	175,221
	Recoveries		
6	Total Sales (MCF)	1,844,956	1,845,000
7	CIP-Exempt Sales (MCF)	66,023	66,000
8	Total CIP-Applicable Sales (MCF) (Line 6 - Line 7)	1,778,933	1,779,000
9	Base Rate (CCRC) (\$/Dth)	0.0413	0.0413
10	Base Rate (CCRC) Recovery (\$) (Line 8*Line 9)	(73,470)	(73,473)
11	Adjustment Factor (CCRA) (\$/Dth)	0.0300	0.0300
12	Adjustment Factor (CCRA) Recovery (\$) (Line 8 * Line 11)	(53,368)	(53,370)
13	Total Recoveries (\$) (Lines 10 + 12)	(126,838)	(126,843)
	Carrying Charges		
14	Sub-Balance (\$) (Lines 5 + 13)	(84,779)	48,378
15	Carrying Charge Rate		
16	Carrying Charges (\$) (Line 14 * Line 15)		
17	Ending Tracker Balance (\$) - Under/(Over) Recovered (Lines 14 + 16)	(84,779)	48,378

EXHIBIT C
Proposed Tariff Revision

Conservation Improvement Program Adjustment Rider (Continued)

Section V
1st Revised Sheet No. 27

Recoverable Conservation Improvement Expense shall be the incremental Conservation Improvement Program costs, including approved incentives, not recovered through base rates as estimated for a designated period. The initial implementation of this rider will also reflect 2016 projected CIP expenditures as approved by the Director of the Office of Energy Security. The Program costs shall be recovered from customer class using the current sales forecast.

The applicable rate that will be assessed to all non-CIP exempt customers in each rate class is:

Base Charge	Adjustment
CCRC (included in distribution charge)	CIP Adjustment Factor
<u>\$0.0413 / Dth</u>	<u>\$0.03 / Dth</u>

For each designated twelve (12) month period, an annual reconciliation will be determined based upon actual annual conservation costs incurred by GMG compared with annual conservation costs recovered from volumes of gas sold. The annual cost recovered is the product of the total unit rate used in calculating the CIP during the twelve (12) month period and the applicable gas sales volumes during the period when each of the total unit rates were in effect. The difference between actual cost and recovered cost will be used in calculating the annual CIP Adjustment Factor for the next twelve (12) month period. The CIPR factor will be applied to customers' billings for the designated period and will be in effect for a twelve (12) month period. Any under or over-recovery due to the CIP Adjustment Factor will be included in the calculation of the CIP Adjustment Factor for the following period in order to collect from or return to customers the under or over-recovered amount.

Date Filed: October 9, 2019
By: Greg Palmer, President & CEO

Effective Date: January 1, 2020

Docket No. G022/M-19-_____

Order Date: _____

Conservation Improvement Program Adjustment Rider (Continued)

Section V

Revised Sheet No. 27

1st

Recoverable Conservation Improvement Expense shall be the incremental Conservation Improvement Program costs, including approved incentives, not recovered through base rates as estimated for a designated period. The initial implementation of this rider will also reflect 2016 projected CIP expenditures as approved by the Director of the Office of Energy Security. The Program costs shall be recovered from customer class using the current sales forecast.

The applicable rate that will be assessed to all non-CIP exempt customers in each rate class is:

Base Charge	Adjustment
CCRC (included in	CIP Adjustment
<u>distribution charge)</u>	<u>Factor</u>
\$0.0413 / Dth	\$0. 4803 / Dth

For each designated twelve (12) month period, an annual reconciliation will be determined based upon actual annual conservation costs incurred by GMG compared with annual conservation costs recovered from volumes of gas sold. The annual cost recovered is the product of the total unit rate used in calculating the CIP during the twelve (12) month period and the applicable gas sales volumes during the period when each of the total unit rates were in effect. The difference between actual cost and recovered cost will be used in calculating the annual CIP Adjustment Factor for the next twelve (12) month period. The CIPR factor will be applied to customers' billings for the designated period and will be in effect for a twelve (12) month period. Any under or over-recovery due to the CIP Adjustment Factor will be included in the calculation of the CIP Adjustment Factor for the following period in order to collect from or return to customers the under or over-recovered amount.

Date Filed: ~~January 12, 2017~~ October 9, 2019
By: Greg Palmer, President & CEO

Effective Date: January 1, ~~2017~~ 2020

Docket No. G022/M-~~16-49419-~~_____

Order Date: ~~January 5, 2017~~_____