

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

Katie Sieben	Chair
Joseph K. Sullivan	Vice Chair
Hwikwon Ham	Commissioner
Audrey Partridge	Commissioner
John Tuma	Commissioner

In the Matter of Cold Weather Reports
(CWR) – Regulated Gas & Electric
Companies

DOCKET NO. E, G-999/PR-25-02

**SUPPLEMENTAL COMMENTS OF THE
OFFICE OF THE ATTORNEY GENERAL—
RESIDENTIAL UTILITIES DIVISION**

INTRODUCTION

The Office of the Attorney General—Residential Utilities Division (RUD) respectfully submits the following Supplemental Comments in response to the Reply Comments of the Citizens Utility Board (CUB) and the Legal Services Advocacy Project (LSAP) filed on April 18, 2025. CUB and LSAP informed the Commission that Greater Minnesota Gas (GMG) had not filed any of the statutorily¹ required disconnection reporting information in over a year and recommended that the Commission refer this matter to the Office of the Attorney General for appropriate legal action.² GMG subsequently late-filed the reporting information for 2024 and through April 25, 2025 on April 28, 2025.³

RUD writes these Supplemental Comments to provide guidance to the Commission if it wishes to take action on GMG’s statutory violations. When the Commission finds that a utility knowingly and intentionally violated any provision of Chapter 216B of the Minnesota Statutes,

¹ Minn. Stat. § 216B.091; Minn. Stat. § 216B.096

² Reply Comments of Reply Comments of the Citizens Utility Board and the Legal Services Advocacy Project at 9-10 (Apr. 18, 2025) (“CUB/LSAP Reply Comments”).

³ Docket No. E, G-999/PR-24-02, Document IDs 20254-218188-01 through -44 (Apr. 28, 2025); Docket No. E, G-999/PR-25-02, Document IDs 20254-218189-01 through -21 (Apr. 28, 2025).

the utility is subject to a fine of \$100 to \$1000 for each violation.⁴ If the Commission finds GMG knowingly and intentionally committed such violations, the fines could be pursued in Ramsey County court by the Office of the Attorney General.⁵

BACKGROUND

Minnesota law requires that all regulated utilities “file a report each week” during the Cold Weather Rule (CWR) period, which runs from October 1 to April 30 each year.⁶ In these CWR reports, utilities must inform the Commission of the number of “heating service customers that are or remain disconnected from service for nonpayment” and the number of heating service customers who are reconnected each week.⁷ The required reports are a standardized Excel spreadsheet with a running tally, as shown in Figure 1.

Figure 1: GMG Weekly CWR Report for the Week Ending 2/28/2025⁸

File this form separately each week as required. Then, provide all weeks for a given month when making monthly filing.

Utility Heating Service Customers*

All Utilities (starting October 1)

Week ending date	Utility	Total # Customers Currently Disconnected for non-payment	# Customers Involuntarily Disconnected for non-payment This Week, Natural Gas	# Customers Involuntarily Disconnected for non-payment This Week, Electric	# Customers Reconnected This Week**
1/3/2025	GMG	7	0	N/A	0
1/10/2025	GMG	7	0	N/A	0
1/17/2025	GMG	7	1	N/A	1
1/24/2025	GMG	7	1	N/A	1
1/31/2025	GMG	7	0	N/A	0
2/7/2025	GMG	6	0	N/A	1
2/14/2025	GMG	5	0	N/A	1
2/21/2025	GMG	5	0	N/A	0
2/28/2025	GMG	5	0	N/A	0

⁴ Minn. Stat. § 216B.57; 216B.59.

⁵ Minn. Stat. § 216B.61; 216B.64.

⁶ Minn. Stat. § 216B.096, subd. 11.

⁷ *Id.* Utilities are not obligated to file weekly CWR reports if there are no disconnected heating service customers. *Id.*

⁸ Docket No. E, G-999/PR-25-02, Document ID 20254-218189-12 (April 28, 2025).

In addition, public utilities must file a report every month of the year with more specific data regarding residential customers. These reports include more specific information regarding affordability, including the number and total amount of accounts past due, average customer past due amounts, and various metrics regarding disconnections and disconnection notices.⁹ During the CWR period, utilities must report even more data regarding disconnections.¹⁰ These reports must be filed within 45 days of the end of the month for which data is being reported.¹¹

Greater Minnesota Gas frequently fails to comply with these requirements. As CUB and LSAP observed, GMG did not file any of these reports for over a year, failing to report on any of the time period from January 1, 2024 through April 25, 2025 until April 28, 2025.¹² This includes a failure to file at least 45 weekly reports for the weeks from January 1, 2024 through April 18, 2025, and 14 monthly reports.¹³ On April 28, GMG filed all of its missed weekly reports for the weeks from January 1, 2024 through April 25, 2025, and all of its missed monthly reports for the months from January 2024 through February 2025.¹⁴ With its back-filed reports, GMG filed a letter stating that it did not anticipate future delays in filing reports, but as of the filing of these supplemental comments, GMG has not filed its weekly report for the final week of April 2025.

After GMG's April 28, 2025 filing, RUD promptly sent information requests seeking further details on the allegations in GMG's filing letter.¹⁵ GMG failed to provide any responses by

⁹ Minn. Stat. § 216B.091(a).

¹⁰ Minn. Stat. § 216B.091(b).

¹¹ Minn. Stat. § 216B.091(c).

¹² See Docket No. E, G-999/PR-24-02, Document IDs 20254-218188-01 through -44 (Apr. 28, 2025); Docket No. E, G-999/PR-25-02, Document IDs 20254-218189-01 through -21 (Apr. 28, 2025).

¹³ *Id.* Because monthly reports must be filed within 45 days of the end of the month for which the data is being reported, the March 2025 report was not late and April 2025 has not ended.

¹⁴ Docket No. E, G-999/PR-24-02, Document IDs 20254-218188-01 through -44 (Apr. 28, 2025); Docket No. E, G-999/PR-25-02, Document IDs 20254-218189-01 through -21 (Apr. 28, 2025).

¹⁵ RUD Information Request 001 (April 30, 2025), attached hereto as Attachment A.

the May 12, 2025 due date.¹⁶ RUD then promptly sent a letter asking GMG to provide its responses by noon on May 14, as RUD wished to include GMG's responses in these supplemental comments.¹⁷ GMG responded by this second deadline with objections and an explanation of what it planned to do moving forward, but no responses to any of the questions asked.¹⁸

GMG's failure to comply with Minnesota statute actually goes back further. For example, in Docket PR-23-02, where GMG's last reports were filed prior to April 28, 2025, GMG did not file its October and November 2023 monthly reports nor any of its weekly CWR reports from October 2023 through December 2023 until February 2024.¹⁹ Similarly, GMG did not file its monthly reports from March 2023 through August 2023 nor any of its April 2023 weekly reports until October 2023.²⁰ Its monthly reports from January and February 2023 were timely filed, but of the weekly reports from January 2023 through March 2023,²¹ only its reports for the weeks of January 21²² and March 25²³ were filed before the following week had lapsed.

These filings are required by statute, and there is no statutory exemption that authorizes GMG to file its reports in the way that it has.

¹⁶ Letter Re: Failure to Respond to Information Request 001 (May 13, 2025), attached hereto as Attachment B.

¹⁷ *Id.*

¹⁸ GMG Response to Information Request 001 (May 14, 2025), attached hereto as Attachment C.

¹⁹ Docket No. G-022/PR-23-02, Document IDs 20242-203094-01 through -10 (Feb. 05, 2024); 20242-203095-01 through -06 (Feb. 05, 2024).

²⁰ 202310-199962-01 through -10 (Oct. 30, 2023); 202310-200023-01 through -02 (Oct. 30, 2023).

²¹ 20233-194421-01 through -04 (March 31, 2023); 20233-194108-02 through -04 (March 20, 2023); 20232-193347-01 through -03 (Feb. 22, 2023); 20231-192476-01 (Jan. 24, 2023); 20231-192379-01 through -02 (Jan. 20, 2023).

²² Docket No. G-022/PR-23-02, Document ID 20231-192476-01. This report was filed on January 24, 2023.

²³ Docket No. G-022/PR-23-02, Document ID 20233-194421-04. This report was filed on March 31, 2023.

ANALYSIS

Greater Minnesota Gas repeatedly and continuously violated two different statutes for the entirety of 2024 and through April 2025. Because these statutes are long-standing law and GMG previously filed the required reports, there is sufficient evidence for the Commission to conclude that GMG's failure to file the reports was knowing and intentional. If the Commission finds that the violations were knowing and intentional, the statute provides for GMG to be fined between \$100 and \$1000 for each violation. The Commission has authority to assess this penalty, and the Office of the Attorney General can pursue collection of the penalties in district court.

I. THERE IS SUFFICIENT EVIDENCE FOR THE COMMISSION TO FIND THAT GMG KNOWINGLY AND INTENTIONALLY VIOLATED MINN. STAT. § 216B.091 AND MINN. STAT. § 216B.096, SUBD. 11.

Minnesota law provides:

Any person who knowingly and intentionally violates any provision of Laws 1974, chapter 429...is subject to a penalty of not less than \$100 nor more than \$1,000 for each violation.²⁴

Thus, the Commission is tasked with determining two questions: first, whether GMG violated any provisions of Chapter 216B²⁵ and, if so, how many times;²⁶ and second, whether the violations were "knowing and intentional." There is sufficient evidence to find that GMG violated provisions of 216B at least 60 times and that the violations were knowing and intentional.

GMG did not file the weekly CWR reports required by 216B.096, subdivision 11 or the monthly reports required by Minn. Stat. § 216B.091. It violated the former provision each time a

²⁴ Minn. Stat. § 216B.57.

²⁵ "Laws 1974, chapter 429" was codified as Minnesota Laws, chapter 216B.

²⁶ Each violation of Chapter 216B is "a separate and distinct offense." Minn. Stat. § 216B.59. Penalties are cumulative. Minn. Stat. § 216B.60.

week or more lapsed since its last weekly filing,²⁷ and violated the latter each time 45 days lapsed since the end of the month for which the report was required.²⁸ GMG does not dispute that it failed to make these filings or that the filings are required by law.²⁹ Additionally, eDockets is a government record that demonstrates when GMG did and did not file the required reports. This record shows that, since the beginning of 2024, of the 45 reports GMG was required by to file “each week” of the CWP period, only the report for the week of April 25, 2025³⁰ was filed before the following week had lapsed.³¹ In the same time period, GMG failed to timely file 14³² of the 15 monthly reports it was required to file. There is thus sufficient evidence to find that GMG committed 45 violations of Minn. Stat. § 216B.096, subdivision 11 and 14 violations of Minn. Stat. § 216B.091 between January 1, 2024 and April 25, 2025. Because GMG has also failed to file the last April weekly report as of the filing of these supplemental comments, the number of violations of Minn. Stat. § 216B.096 is now 46, for a total of 60 violations of Chapter 216B.³³

There is also sufficient evidence to find that these violations were knowing and intentional. GMG is a regulated utility. All regulated utilities are subject to the provisions of Chapter 216B. A

²⁷ 216B.096, subdivision 11 states “a utility must file a report each week between October 15 and the end of the cold weather period,” so a weekly report is on time only if it is filed before the next week has lapsed.

²⁸ Minn. Stat. § 216B.091(c).

²⁹ Docket Nos. E, G-999/PR-25-02 and E, G-999/PR-24-02, Filing Letter (Apr. 28, 2025).

³⁰ Docket No. E, G-999/PR-25-02, Document IDs 20254-218189-21 (Apr. 28, 2025).

³¹ See Docket No. E, G-999/PR-24-02, Document IDs 20254-218188-01 through -04, -06 through -09, -11 through -15, -18 through -21, -23, -29 through -32, -34 through -38, -40 through -43 (Apr. 28, 2025); Docket No. E, G-999/PR-25-02, Document IDs 20254-218189-03 through -07; -09 through -12; -14 through -20 (Apr. 28, 2025).

³² Docket No. E, G-999/PR-24-02, Document IDs 20254-218188-05, -10, -16, -17, -22, -24 through -28, -33, -39 (Apr. 28, 2025); Docket No. E, G-999/PR-25-02, Document IDs 20254-218189-02, -08 (Apr. 28, 2025).

³³ See Minn. Stat. § 216B.59 (“Every violation of the provisions of [Chapter 216B]...is a separate and distinct offense[.]”); see also Minn. Stat. § 216B.60 (“All penalties accruing under [Chapter 216B] shall be cumulative[.]”).

violation of Chapter 216B is “knowing and intentional” when a utility knows that it has performed an act or omission and intended to perform that act or omission, and the act or omission violates Chapter 216B.³⁴ The utility does not need to know that the act or omission is a violation of the law nor does it need to intend to violate the law.³⁵

GMG filed CWR reports and monthly reports prior to January 1, 2024, demonstrating that it knew that it was filing the reports immediately before it ceased to file them.³⁶ GMG acknowledges in its April 28, 2025 letter that the 59 reports between January 1, 2024 and April 28, 2025 were not timely filed, again showing knowledge of its failure to comply with Chapter 216B.³⁷ Given GMG’s April 28 acknowledgement of its failure to file the reports, the Commission would be justified in concluding that GMG also knew that it failed to timely file its report for the last week of April 2025.

There is also sufficient evidence for the Commission to find that GMG intentionally did not file the reports. GMG states in its filing letter that it “realized” in late 2024 that the employee charged with “maintaining” the relevant data “had not done so correctly.”³⁸ This statement says nothing of the employee responsible for *filing* the data. GMG’s Chief Executive Officer recently stated that “GMG has one part of one position among its 25 employees – its Corporate Attorney – responsible for its regulatory work.”³⁹ Every weekly report filed by GMG for the period running

³⁴ See *In re Minnesota Dept. of Commerce for Com’n Action Against AT&T*, 759 N.W.2d 242, 249-250 (Minn. App. 2009). Although this is a telecom case, the “knowing and intentional” standard is the same in Chapter 237 as in Chapter 216B. See Minn. Stat. § 237.461, subd. 2.

³⁵ See *Id.*

³⁶ See Docket No. E, G-999/PR-23-02.

³⁷ Docket Nos. E, G-999/PR-25-02 and E, G-999/PR-24-02, Filing Letter (April 28, 2025) (“Now that GMG has a new system in place for compiling the reports, it does not anticipate future problems or delays in submission of the reports.”).

³⁸ Docket No. G-022/PR-25-02, Filing Letter (Apr. 28, 2025)

³⁹ Docket No. G-022/GR-24-350, Rebuttal of Gregory Palmer at 6 (Mar. 24, 2025).

from January 1, 2023 through December 31, 2023 indicates that it was authored and “last modified by” GMG’s corporate attorney.⁴⁰ The monthly reports in the same time period were all “last modified by” GMG’s corporate attorney.⁴¹ The reports filed 14 months later, on April 28, 2025, have the same “last modified by” information⁴² and were filed by GMG’s corporate attorney.⁴³ In between that time, on August 1, 2024, GMG made a compliance filing confirming it paid participant compensation in Docket No. PR-24-02, which was also signed by its corporate attorney.⁴⁴ The Commission could find that making this filing in the docket while at the same time failing to file any of the required reports in the same docket demonstrates an intent not to file the reports. To summarize, the only employee responsible for GMG’s regulatory work is the high-level employee who modifies its required reports (both before and after the 14 months without any filings) and files them, and who made a participant compensation filing in the CWR docket during the 14-month reporting hiatus. This is sufficient evidence to find the failure to file the reports constituted knowing and intentional violations of Chapter 216B.

Furthermore, if GMG did not know the number of disconnected customers it had for the 2024 or 2025 CWR periods, or if it was unable to input those numbers into the weekly Excel

⁴⁰ Docket No. G-022/PR-23-02, Document IDs 20242-203094-04 through -10 (Feb. 05, 2024); 20242-203095-01 through -06 (Feb. 05, 2024); 202310-199962-01 through -05 (Oct. 30, 2023); 20233-194421-01 through -04 (March 31, 2023); 20233-194108-02 through -04 (March 20, 2023); 20232-193347-01 through -03 (Feb. 22, 2023); 20231-192476-01 (Jan. 24, 2023); 20231-192379-01 through -02 (Jan. 20, 2023). The reports are Excel spreadsheets that can be downloaded from eDockets. To view the document information, open the Excel spreadsheet, click “File” and then click on “Info.”

⁴¹ Docket No. G-022/PR-23-02, Document IDs 20242-203094-01 through -03 (Feb. 5, 2024); 202310-199962-06 through -10 (Oct. 30, 2023); 202310-200023-01 through -02 (Oct. 30, 2023); 20233-194108-01 (March 20, 2023); 20232-193346-01 (Feb. 22, 2023).

⁴² Docket No. G-022/PR-24-2, Document IDs 20254-218188-01 through -43 (Apr. 28, 2025).

⁴³ eDockets Service Email of April 28, 2025, attached hereto as Attachment D.

⁴⁴ Docket No. E, G-999/PR-24-02, Confirmation of Payment of Participant Compensation (Aug. 1, 2024).

spreadsheet, it could have filed notices regarding those facts along with updates on the actions GMG was taking to remedy them. The same goes for its monthly reports. Instead, GMG was chronically late in filing the reports throughout 2023, ceased reporting entirely for over a year, and then filed over a year's worth of reports 10 days after CUB and LSAP observed the lack of compliance in a filing in the Cold Weather Rule docket, and 17 days after a witness for the Office of the Attorney General made the same observation in surrebuttal testimony in Greater Minnesota Gas's rate case.⁴⁵

II. GMG'S EXPLANATIONS FOR ITS FAILURE TO FILE FALL SHORT.

The explanations GMG proffered in its April 28, 2025 letter do not account for all of the violations. The letter states that "In late 2024, GMG realized that the employee maintaining the report data had not done so correctly" and that the efforts to "rebuild" the data were "complicated" by a change in billing software in 2024 that required extra effort to "extract the necessary data."⁴⁶ This does not tell the Commission how late in 2024 this discovery was made, and does not explain the failure to file the reports before "late 2024." Furthermore, the weekly reports are a one-page Excel spreadsheet that lists the total number of disconnected customers, number of new disconnections, and number of reconnections – GMG could have manually input this information into its weekly reports. If GMG was unable to see these three numbers and put them into an Excel spreadsheet for over a year, that raises the question of why GMG did not inform the Commission that it lacked the ability to access basic information about its own operations and perform some basic requirements of its business.

⁴⁵ Docket No. G-022/GR-24-350, Surrebuttal Testimony of Chad Stevenson at 25 (Apr. 11, 2025).

⁴⁶ Docket No. G-022/PR-25-02, Filing Letter (Apr. 28, 2025).

RUD asked GMG for further details regarding the allegations in GMG’s filing letter, but GMG failed to timely respond.⁴⁷ After RUD asked a second time,⁴⁸ GMG responded with objections to RUD’s information request, stating that “Regardless of the cause of GMG’s nonperformance...GMG accepts responsibility for it.”⁴⁹ GMG also provided a description of changes to internal processes it planned to make to improve the accuracy⁵⁰ and timeliness⁵¹ of its reports. GMG did not provide any explanations regarding the 60 violations themselves, and it is not clear what GMG meant by “accept[ing] responsibility for them.” This failure to respond further supports a conclusion that GMG’s violations of statutory reporting requirements were because GMG simply chose not to comply—i.e., that the violations were knowing and intentional.

There is no dispute as to whether GMG violated the reporting requirements of Minn. Stat. § 216B.091 and Minn. Stat. § 216B.096, subdivision 11. The Commission will need to make a determination as to whether GMG “knowingly and intentionally” failed to file the required reports. As laid out above, there is sufficient evidence for the Commission to make such a finding.

III. IF THE COMMISSION FINDS THAT GMG COMMITTED KNOWING AND INTENTIONAL VIOLATIONS OF CHAPTER 216B, THE COMMISSION COULD REFER THE MATTER TO THE ATTORNEY GENERAL.

Upon finding that GMG knowingly and intentionally violated Chapter 216B, the Commission could refer the matter to the Attorney General to seek monetary penalties. Minn. Stat. § 216B.57 provides:

Any person who knowingly and intentionally violates any provision of [Chapter 216B]...is subject to a penalty of not less than \$100 nor more than \$1,000 for each violation.

⁴⁷ Attachment A; Attachment B.

⁴⁸ Attachment B.

⁴⁹ Attachment C at 1.

⁵⁰ *Id.* at 2-3.

⁵¹ *Id.* at 3.

Penalties under this provision are cumulative.⁵² Actions to recover penalties under Chapter 216B proceed in district court.⁵³ The Attorney General has authority to commence actions to collect such penalties.⁵⁴ Accordingly, if the Commission finds that GMG knowingly and intentionally violated Chapter 216B by not filing the required reports, it may refer the matter to the Attorney General to pursue monetary penalties of between \$100 and \$1000 for each violation.

CONCLUSION

GMG violated two different provisions of Chapter 216B for over a year. RUD does not take a position on whether GMG's violations were knowing and intentional. RUD does, however, observe that there is sufficient evidence in the record for the Commission to find that the violations were knowing and intentional. The Commission should evaluate the record and make appropriate findings. If the Commission finds that GMG's violations were knowing and intentional, it can refer the matter to the Office of the Attorney General to seek monetary penalties.

Dated: May 14, 2025

Respectfully submitted,

KEITH ELLISON
Attorney General
State of Minnesota

/s/ Joey Cherney

JOEY CHERNEY
Assistant Attorney General
Atty. Reg. No. 0403219

445 Minnesota Street, Suite 600
St. Paul, Minnesota 55101-2131
(651) 300-7569 (Voice)
(651) 296-9663 (Fax)
Joey.Cherney@ag.state.mn.us

⁵² Minn. Stat. § 216B.60.

⁵³ Minn. Stat. § 216B.61.

⁵⁴ Minn. Stat. § 216B.64.

ATTORNEYS FOR MINNESOTA OFFICE
OF THE ATTORNEY GENERAL—
RESIDENTIAL UTILITIES DIVISION

OAG No. 001

**State of Minnesota
Office of the Attorney General
Utility Information Request**

In the Matter of Cold Weather Rule Reports **MPUC Docket Nos.**

E, G-999/PR-25-02
E, G-999/PR-24-02

Requested from: Greater Minnesota Gas

Requested by: OAG RUD

Date of Request:

April 30, 2025

Due Date:

May 12, 2024

Reference: GMG's April 28, 2025 Filing Letter

Request:

All requests refer to the time period beginning January 1, 2023 through the present.

1. Name the employee responsible for maintaining the report data, the date on which they were hired, and the date on which they left GMG.
2. Describe the job duties of the employee responsible for maintaining the report data.
3. Explain what "maintaining the report data" means, including all actions and activities involved in "maintaining the report data."
4. State the date on which GMG discovered that this employee had not maintained the report data correctly.
5. Describe how the employee did not maintain the report data correctly.
6. Provide all communications sent or received by GMG staff regarding the failure to maintain the report data correctly.
7. Describe all actions and activities involved in "rebuilding the data."
8. Name all employees who engaged in "rebuilding the data."
9. State the date on which GMG changed its billing software.
10. Explain how the change in billing software prevented GMG from knowing the number of disconnections it had each week of the Cold Weather Rule period.

Response by _____

Title _____

Department _____

Telephone _____

Email _____

11. Explain how the change in billing software prevented GMG from knowing all other information required to be reported by Minn. Stat. § 216B.091 and 216B.096, subd. 11.
12. Describe all actions and activities involved in “work[ing] with [GMG’s] software vendor support personnel to develop tools to extract the necessary data for the reports.”
13. Describe all tools developed in this way.
14. Provide all communications sent or received by GMG staff regarding the development of these tools.
15. Provide all communications sent or received by GMG staff regarding the ability or inability to extract the necessary data for the reports.
16. Provide all communications sent or received by GMG staff regarding the ability or inability to report information required by Minn. Stat. § 216B.091 and 216B.096, subd. 11.
17. Describe all actions and activities involved in “compil[ing] and cross-check[ing] the data to ensure its accuracy,” including, but not limited to, how the data was compiled and what the data was cross-checked against.

Any responsive documents must be provided in their unlocked native format with all formulas and links intact.

Response by _____
Title _____
Department _____
Telephone _____
Email _____



The Office of
Minnesota Attorney General Keith Ellison
helping people afford their lives and live with dignity, safety, and respect • www.ag.state.mn.us

April 30, 2025

Kristine Anderson
kanderson@greatermngas.com

VIA E-MAIL

**Re: *In the Matter of Cold Weather Rule Reports*
MPUC Docket E, G-999/PR-25-02**

Dear Ms. Anderson:

Enclosed please find the *Office of the Attorney General—Residential Utilities Division's Information Request No. 001* in the above-entitled matter.

Provide responses by email to utilityinfo@ag.state.mn.us, or by any alternative method of service agreed upon by the OAG in writing in this matter. If service of an information request response is accomplished through a data-sharing platform, notify utilityinfo@ag.state.mn.us when a response is available and list the responses that are being posted. Items that cannot be sent via email or posted in a data-sharing platform, may be mailed to the attention of Judy Sigal at the following address: 445 Minnesota Street, Suite 1100, St. Paul, MN 55101.

Please direct any questions regarding the enclosed request(s) to me at the number below.

By copy of this letter, we have served all parties requesting service. A Certificate of Service is also enclosed.

Sincerely,

/s/ **Joey Cherney**

JOEY CHERNEY

Assistant Attorney General

(651) 300-7569 (Voice)

(651) 296-9663 (Fax)

Joey.Cherney@ag.state.mn.us

CERTIFICATE OF SERVICE

Re: *In the Matter of Cold Weather Rule Reports*
MPUC Docket: E, G-999/PR-25-02

I, JUDY SIGAL, hereby certify that on the 30th day of April, 2025, I served a true and correct copy of the *Office of the Attorney General—Residential Utilities Division’s Information Request No. 001* upon all parties listed below by e-mail and/or electronic submission.

Kristine Anderson	kanderson@greatermngas.com
-------------------	----------------------------

/s/ Judy Sigal
JUDY SIGAL



The Office of
Minnesota Attorney General Keith Ellison
helping people afford their lives and live with dignity, safety, and respect • www.ag.state.mn.us

May 13, 2025

Ms. Kristine Anderson
Corporate Attorney
Greater Minnesota Gas
1900 Cardinal Lane
Faribault, MN 55021

VIA E-MAIL AND U.S MAIL

Re: Failure to Respond to Information Request 001
In the Matter of Cold Weather Reports – Regulated Gas and Electric Companies
Docket No. E, G-999/PR-25-02

Dear Ms. Anderson:

Greater Minnesota Gas has failed to timely respond to any of the questions contained in Information Request 001, which our office served upon you on April 30, 2025. Responses were due yesterday, May 12, 2025, by 4:30 p.m. The Office of the Attorney General—Residential Utilities Division requires your responses no later than 12:00 p.m. tomorrow, May 14, 2025. If this is not possible, please call me at the number below to discuss when I can expect GMG's responses.

Sincerely,

/s/ **Joey Cherney**

JOEY CHERNEY

Assistant Attorney General

(651) 300-7569 (Voice)

(651) 296-9663 (Fax)

Joey.cherney@ag.state.mn.us

AFFIDAVIT OF SERVICE

Re: Failure to Respond to Information Request 001
In the Matter of Cold Weather Reports – Regulated Gas and Electric Companies
Docket No. E, G-999/PR-25-02

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

I, JUDY SIGAL, hereby state that on the 13th day of May, 2025, I served a ***Letter of the Office of the Attorney General—Residential Utilities Division*** upon all parties listed below by electronic mail and U.S. Postal Service with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

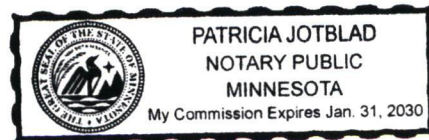
Ms. Kristine Anderson
Corporate Attorney
Greater Minnesota Gas
1900 Cardinal Lane
Faribault, MN 55021
kanderson@greatermngas.com


Judy Sigal

Subscribed and sworn to before me
This 13th day of May, 2025.


Notary Public

My Commission expires: January 31, 2030.



OAG No. 001

**State of Minnesota
Office of the Attorney General
Utility Information Request**

In the Matter of Cold Weather Rule **MPUC Docket Nos.**
Reports

E, G-999/PR-25-02
E, G-999/PR-24-02

Requested from: Greater Minnesota Gas

Requested by: OAG RUD

Date of Request:

April 30, 2025

Due Date:

May 12, 2024

Reference: GMG's April 28, 2025 Filing Letter

Request:

All requests refer to the time period beginning January 1, 2023 through the present.

1. Name the employee responsible for maintaining the report data, the date on which they were hired, and the date on which they left GMG.
2. Describe the job duties of the employee responsible for maintaining the report data.
3. Explain what "maintaining the report data" means, including all actions and activities involved in "maintaining the report data."
4. State the date on which GMG discovered that this employee had not maintained the report data correctly.
5. Describe how the employee did not maintain the report data correctly.
6. Provide all communications sent or received by GMG staff regarding the failure to maintain the report data correctly.
7. Describe all actions and activities involved in "rebuilding the data."
8. Name all employees who engaged in "rebuilding the data."
9. State the date on which GMG changed its billing software.
10. Explain how the change in billing software prevented GMG from knowing the number of disconnections it had each week of the Cold Weather Rule period.

Response by Kristine Anderson

Title Corporate Attorney

Department Legal & Regulatory

Telephone 507-209-2110

Email kanderson@greatermngas.com

11. Explain how the change in billing software prevented GMG from knowing all other information required to be reported by Minn. Stat. § 216B.091 and 216B.096, subd. 11.
12. Describe all actions and activities involved in “work[ing] with [GMG’s] software vendor support personnel to develop tools to extract the necessary data for the reports.”
13. Describe all tools developed in this way.
14. Provide all communications sent or received by GMG staff regarding the development of these tools.
15. Provide all communications sent or received by GMG staff regarding the ability or inability to extract the necessary data for the reports.
16. Provide all communications sent or received by GMG staff regarding the ability or inability to report information required by Minn. Stat. § 216B.091 and 216B.096, subd. 11.
17. Describe all actions and activities involved in “compil[ing] and cross-check[ing] the data to ensure its accuracy,” including, but not limited to, how the data was compiled and what the data was cross-checked against.

Any responsive documents must be provided in their unlocked native format with all formulas and links intact.

GMG RESPONSE:

GMG objects to this Information Request 001 on the grounds that the requested information is not relevant, that the Information Request is unduly burdensome, that the Information Request is vague, and that the Information Request is overbroad. Without waiving and subject to the foregoing objections, GMG states the following:

GMG acknowledges that it did not timely file its weekly and monthly reports in Dockets 24-02 and 25-02 and that the reports were seriously delinquent. While not making excuses for its filing deficiencies, GMG did attempt to provide a high-level explanation of circumstances that contributed to the late filings. Regardless of the cause of GMG’s nonperformance, the fact that it occurred cannot be changed, GMG accepts responsibility for it, and the delinquent reports have been submitted. GMG apologizes for its compliance failure and any inconvenience caused by it.

GMG has instituted new procedures for gathering and maintaining the underlying report data, report preparation, and filing moving forward in an effort to assure timely compliance in the future. Responsibility for preparing the report data previously fell on one person and GMG has involved more people and established preparation, filing, and tracking practices for the reports.

Response by Kristine Anderson
Title Corporate Attorney
Department Legal & Regulatory
Telephone 507-209-2110
Email kanderson@greatermngas.com

Two members of the customer service team have been tasked with extracting and compiling the data that feeds into the reports, and with preparing the report. Those two individuals handle GMG's energy assistance, accounts receivable, payment arrangements, disconnection determinations, and community action agency relationships. Both of those individuals, as well as their immediate team lead, have been specifically retrained in all aspects of the reporting requirements and how to acquire and maintain the necessary data. Training emphasized ensuring that the data is correct, that there is continuity across the data reported, completeness, timeliness, and compliance with the related rules and regulations. The importance of thinking about the data from a broad perspective was highlighted, such that the individuals were encouraged to not just rely on the information generated from a report but to also look at the report results and compare them to other known information such as disconnection records, financial data, information discussed in periodic meetings regarding related data, etc., to also provide a common-sense consideration of report accuracy and completeness.

Those individuals, working together and with the oversight of their team lead, will provide the completed reports, including access to all of the supporting data, to two people on GMG's leadership team (their group manager and the corporate attorney) by a monthly deadline that allows one week for review of the reports and any necessary changes to be made. That five-person team constitutes approximately 1/3 of GMG's total daily in-office personnel. The monthly deadlines have been pre-populated on the electronic calendars of all five individuals so that, if the report and data have not been made available, the rest of the team is alerted and can remedy it. Thereafter, the individual responsible for filing the report in edockets will provide confirmation to the rest of the five-person team that the report has been filed on or before the morning that the report is due, which provides an electronic alert that the filing task has been completed. If such confirmation has not been provided by mid-day, all other members of the five-person group have been charged with inquiring and intervening to assure that the report is filed before the end of the day that it is due.

GMG believes that having multiple individuals involved in acquiring and maintaining the underlying data as well as responsibility for report preparation will provide internal accountability and depth of knowledge. Additionally, by assigning that responsibility to individuals who handle related areas of the business, the information is more meaningful to them and it will be more likely to be noticed by them if something appears to be off about the data, since they work with and report on data in related areas in various other aspects of their jobs. Similarly, having three levels of personnel involved in the preparing, reviewing, filing, and confirming filing of the reports provides safeguards at multiple stages in the process. GMG is confident that its internal changes will assure compliance in the future.

Response by Kristine Anderson
Title Corporate Attorney
Department Legal & Regulatory
Telephone 507-209-2110
Email kanderson@greatermngas.com

From: eservice.admin@state.mn.us
To: [Residential Utilities PUC Service](#)
Subject: Official Document Service 24-2 Greater Minnesota Gas
Date: Monday, April 28, 2025 8:33:15 AM

Official Service

You have elected to receive electronic service in the following matter. This notification represents official service of document(s) below.

Submission #: [20254-218188](#)

Received Date: 04/28/2025 08:33 AM

On Behalf Of: Greater Minnesota Gas

Filer Name: Kristine Anderson

Dockets

Docket #: 24-2

Description: Cold Weather Reports CWR - Regulated Gas & Electric Companies.

Type: Periodic Reports

Documents

File: Monthly Residential Customer Status Report - February 2024.xlsx

Classification: Public

Type: Report

Date: April 25, 2025

Additional Info:

File: Weekly Customer Status Report - October 25, 2024.xlsx

Classification: Public

Type: Report

Date: April 25, 2025

Additional Info:

From: eservice.admin@state.mn.us
To: [Residential Utilities PUC Service](#)
Subject: Official Document Service 25-2 Greater Minnesota Gas
Date: Monday, April 28, 2025 8:45:36 AM

Official Service

You have elected to receive electronic service in the following matter. This notification represents official service of document(s) below.

Submission #: [20254-218189](#)

Received Date: 04/28/2025 08:45 AM

On Behalf Of: Greater Minnesota Gas

Filer Name: Kristine Anderson

Dockets

Docket #: 25-2

Description: Cold Weather Reports CWR - Regulated Gas & Electric Companies.

Type: Periodic Reports

Documents

File: Weekly Customer Status Report - April 4, 2025.xlsx

Classification: Public

Type: Report

Date: April 25, 2025

Additional Info:

File: Weekly Customer Status Report - February 14, 2025.xlsx

Classification: Public

Type: Report

Date: April 25, 2025

Additional Info:
