

December 22, 2025

Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

**RE: Comments of the Minnesota Department of Commerce
Docket No. G022/M-25-405**

Dear Ms. Bergman:

Attached are the comments of the Minnesota Department of Commerce (Department) in the following matter:

*Greater Minnesota Gas, Inc.'s Petition for Reduction to Conservation Cost
Recovery Adjustment Factor (Petition)*

The Petition was filed by Greater Minnesota Gas on October 31, 2025.

The Department recommends that the Minnesota Public Utilities Commission (Commission) approve Greater Minnesota Gas' Petition. The Department is available to answer any questions that the Commission may have in this matter.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

AZ/ad
Attachments



Before the Minnesota Public Utilities Commission
Comments of the Minnesota Department of Commerce

Docket No. G022/M-25-405

I. INTRODUCTION

On October 31, 2025, Greater Minnesota Gas (GMG or the Company) submitted its Petition with the Commission in docket number G022/M-25-405. In its Petition, the Company requests that the Commission approve:

- A Conservation Cost Recovery Adjustment (CCRA) of \$0.2545/Dth, to be effective on January 1, 2026.

II. PROCEDURAL BACKGROUND

October 31, 2025	The Company submitted its Petition with the Commission.
December 2, 2025	The Department filed a request for variance extension, requesting an additional 21 days to complete its analysis and file comments.
December 2, 2025	The Commission granted the request for extension.

III. DEPARTMENT ANALYSIS

The Department’s analysis of the Company’s Petition is provided below in the following sections:

- A. Commission’s Order from the Previous Year
- B. Proposed Conservation Cost Recovery Adjustment

A. COMMISSION’S ORDER FROM THE PREVIOUS YEAR

On November 8, 2024, the Commission issued its Order approving GMG’s Energy Conservation and Optimization Program Tracker Account and Proposed Conservation Cost Recovery Adjustment,¹ with the following determinations:

¹ See Commission’s November 8, 2024, Order in Docket No. G-022/M-24-45.

1. Approved Greater Minnesota Gas' 2021, 2022, and 2023 Energy Conservation and Optimization (ECO) tracker account with a December 31, 2023 tracker balance of \$415,344.
2. Approved a Conservation Cost Recovery Adjustment of \$0.4407/Dth to be effective on the first billing cycle of the month following the Commission's Order.
3. Approved Greater Minnesota Gas' proposed bill message that reads as follows:

Effective _____, 2024, your bill will include an adjusted Conservation Cost Recovery Adjustment (CCRA). The Minnesota Public Utilities Commission approved the CCRA on _____, 2024. The CCRA is necessary and allowed by law to fund the state mandated Energy Conservation and Optimization Program. The CCRA is \$0.04407 per therm, or \$0.4407 per dekatherm, of natural gas that you use. If you have questions, please contact us at 1-888-931-3411 or www.greatermngas.com. Thank you.

4. Required Greater Minnesota Gas to submit a compliance filing within 10 days of the issue date of the Order in the present docket, with revised tariff sheets reflecting the Commission's determinations in this matter.

B. PROPOSED CONSERVATION COST RECOVERY ADJUSTMENT

Minnesota Statutes 2016B.16., Subd. 6b(c) states that the Commission "may permit a public utility to file rate schedules providing for annual recovery of the costs of energy conservation improvements." This ECO recovery mechanism is generally referred to as the Conservation Cost Recovery Adjustment (CCRA).

B.1. CCRA Proposal

The Company's current CCRA factor was approved by the Commission on November 8, 2024, to be effective on the first billing cycle of the month following the Commission's Order.²

² See Commission's November 8, 2024, Order in Docket No. G-022/M-24-45.

In the Petition, the Company proposes to change the CCRA factor to \$0.2545 per Dth (representing a \$0.1862 per Dth decrease) effective January 1, 2026.³

If the proposed rate were to be effective beginning January 1, 2026, the Company’s year-end 2026 tracker balance would be \$154, as shown in Table 1. Table 1 also provides details behind the Company’s calculation of its proposed CCRA rate of \$0.2545 per Dth.

Table 1. Calculation of the Company’s Proposed CCRA Rate⁴

Line	Description	Time Period	Amount
1	Beginning Balance	January 1, 2026	\$71,572
2	ECO Expenses	January 2026-December 2026	\$520,050
3	2024 DSM Financial Incentive	Approved in 2025 for 2024 Activities	\$0
4	2025 DSM Financial Incentive	Approved in 2026 for 2025 Activities	\$0
5	Carrying Charges	January 2026-December 2026	\$0
6	ECO Expenses Subtotal [Line 1 + Line 2 + Line 3 + Line 4 + Line 5]	January 2026-December 2026	\$591,622
7	CCRC Recovery	January 2026-December 2026	\$82,582
8	Remaining Amount to be Recovered Through CCRA [Line 6 - Line 7]	January 2026-December 2026	\$509,040
9	Projected Sales (Dth)	January 2026-December 2026	1,999,554
10	Proposed CCRA Rate (\$/Dth) [Line 8/Line 9]	Effective January 1, 2026	\$0.2545
11	Forecasted Balance	December 31, 2026	\$154

The CCRA would ideally be set at a rate that brings the Company’s ECO tracker balance as close to zero as possible. Doing so avoids significant over or under recovery of ECO costs by the Company, thus minimizing carrying charges and stabilizing CCRA rates.

Reviewing the data in Attachments, A, B, and C of the Petition, the Department concludes the proposed CCRA factor will bring the ECO tracker closer to zero by the end of 2026 and therefore is reasonable.

The Department reviewed the calculation of the Company’s proposed CCRA rate of \$0.2545 per Dth and concludes it is accurate. The Department recommends the Commission approve the proposed CCRA of \$0.2545 per Dth to be effective January 1, 2026.

³ Petition, Page 3.

⁴ Data in Table 1 retrieved from Petition, Attachment A, B, and C.

B.2. Customer Notification Method for the CCRA Proposal

In addition to updating the relevant tariff sheet, the Department recommends that the Commission approve the Company's proposed bill message, as follows:

Effective January 1, 2026, your bill will include a reduced Conservation Cost Recovery Adjustment (CCRA). GMG has requested approval of the reduction by the Minnesota Public Utilities Commission. In the event that the Commission approves a different CCRA amount, the CCRA will be trued up consistent with the Commission's Order. The CCRA is necessary and allowed by law to fund the state-mandated Energy Conservation and Optimization Program. The CCRA is \$0.02545 per therm, or \$0.2545 per dekatherm, of natural gas that you use. If you have questions, please contact us at 1-888-931-3411 or www.greatermngas.com. Thank you.

IV. DEPARTMENT RECOMMENDATIONS

The Department reviewed the Company's Petition and concluded that it is generally reasonable. Based on analysis of the Petition and the information in the record, the Department has prepared recommendations, which are provided below. The Department is available to answer any questions the Commission may have.

A. RECOMMENDATIONS TO THE COMMISSION

- A.1. Approve a Conservation Cost Recovery Adjustment rate of \$0.2545 per Dth to be effective January 1, 2026.
- A.2. Approve the Company's proposed bill message:

Effective January 1, 2026, your bill will include a reduced Conservation Cost Recovery Adjustment (CCRA). GMG has requested approval of the reduction by the Minnesota Public Utilities Commission. In the event that the Commission approves a different CCRA amount, the CCRA will be trued up consistent with the Commission's Order. The CCRA is necessary and allowed by law to fund the state-mandated Energy Conservation and Optimization Program. The CCRA is \$0.02545 per therm, or \$0.2545 per dekatherm, of natural gas that you use. If you have questions, please contact us at 1-888-931-3411 or www.greatermngas.com. Thank you.
- A.3. Required Greater Minnesota Gas to submit a compliance filing within 10 days of the issue date of the Order in the present docket, with revised tariff sheets reflecting the Commission's determinations in this matter.

CERTIFICATE OF SERVICE

I, Nicole Westling, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Comments**

Docket No. G022/M-25-405

Dated this **22nd** day of **December 2025**

/s/Nicole Westling

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Julie	Ambach	juliea@cmmmpa.org	Shakopee Public Utilities		255 Sarazin St Shakopee MN, 55379 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
2	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
3	Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company		PO Box 351 200 1st St SE Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
4	Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
5	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-405 Also serve ECO SPECIAL service list
6	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
7	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
8	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
9	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-405 Also serve ECO SPECIAL service list
10	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
11	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department	445 Minnesota Street Suite 1400	Electronic Service		Yes	M-25-405 Also serve ECO SPECIAL

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
					of Commerce	St. Paul MN, 55101 United States				service list
12	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
13	Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.		7701 France Ave S Ste 600 Edina MN, 55435 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
14	Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.		823 E 7th St St. Paul MN, 55106 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
15	Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.		2377 Union Lake Trl Northfield MN, 55057 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
16	Melissa S	Feine	melissa.feine@semcac.org	SEMCAC		PO Box 549 204 S Elm St Rushford MN, 55971 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
17	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
18	Karolanne	Foley	karolanne.foley@dairylandpower.com	Dairyland Power Cooperative		PO Box 817 La Crosse WI, 54602-0817 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
19	Tyler	Glewwe	tyler.glewwe@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
20	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
21	Jason	Grenier	kgrenier@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
22	Jeffrey	Haase	jhaase@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
23	Joe	Hoffman	ja.hoffman@smmpa.org	SMPMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
24	Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency		702 3rd Ave S Virginia MN, 55792 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
25	Martin	Kapsch	martin.kapsch@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
26	Deborah	Knoll	dknoll@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
27	Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas		null null, null United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
28	Tina	Koecher	tkoecher@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
29	Martin	Lepak	martin.lepak@aeoa.org	Arrowhead Economic Opportunity		702 S 3rd Ave Virginia MN, 55792 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
30	Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission		1902 6th Ave E Hibbing MN, 55746 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
31	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
32	Josh	Mason	jmason@rpu.org	Rochester Public Utilities		4000 E River Rd NE Rochester MN, 55906 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
33	Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company		4902 N Biltmore Ln PO Box 77007 Madison WI, 53707-1007 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
34	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	M-25-405 Also serve ECO SPECIAL

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
										service list
35	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
36	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
37	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
38	Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
39	Bill	Poppert	info@technologycos.com	Technology North		2433 Highwood Ave St. Paul MN, 55119 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
40	Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024-9583 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
41	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	M-25-405 Also serve ECO SPECIAL service list
42	Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
43	Laura	Silver	laura.silver@state.mn.us		Department of Commerce	85 7th Place E, Suite 500 St. Paul MN, 55101 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
44	Rick	Sisk	rsisk@trccompanies.com	Lockheed Martin		1000 Clark Ave. St. Louis MO, 63102 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
45	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
46	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
47	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
48	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
49	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
50	Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list
51	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	M-25-405 Also serve ECO SPECIAL service list