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May 31, 2019

Mr. Dan Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 East Seventh Place, Suite 350
St. Paul, MN 55101

RE: **Gas Affordability Program Evaluation Report**
Docket No. G004/M-19-_____

Dear Mr. Wolf:

Great Plains Natural Gas Co. ("Great Plains"), a Division of MDU Resources Group, Inc. herewith electronically files its Gas Affordability Program Evaluation Report ("Report").

If you have any questions regarding this filing, please contact me at (701) 222-7856, or Brian Meloy at (612) 335-1451.

Sincerely,

/s/ Tamie Aberle

Tamie A. Aberle
Director of Regulatory Affairs

cc: Brian Meloy
Service List

recommendations regarding GAP. On May 22, 2018 the stakeholder report was filed with the Commission. The utilities did not suggest changes to the GAP, however proposed the use of a streamlined format for annual reporting using a form developed by the Department. On September 28, 2018 the Commission issued an Order accepting the Utilities Stakeholder report as filed and adopting the use of a streamlined reporting format for annual reports using the form developed by the Department. The streamlined reporting format was implemented in Great Plains 2018 GAP report filed with the Commission on March 29, 2019 in Docket No. G004/M-19-247.

I.

GREAT PLAINS' GAP

Great Plains' GAP is available to those customers who (1) have been qualified and receive assistance from the Low-Income Home Energy Assistance Program ("LIHEAP"); (2) agree to be placed on a levelized payment plan; and (3) agree to a reasonable payment schedule.² Consistent with the requirements of Minn. Stat. § 216B.16, Subd. 15, the GAP is designed to assist qualified low-income residential customers to manage and pay their natural gas bills through the establishment of an affordability bill credit and arrearage forgiveness in certain circumstances.

Great Plains' Affordability Component consists of a bill credit available to Qualified Customers to help offset the costs of natural gas service. The bill credit is equal to one-twelfth of the difference between Great Plains' estimate of the Qualified Customer's annual gas bill and 4% of the Qualified Customer's household income as provided by the Qualified Customer to Great Plains.

² Great Plains' GAP is set forth in Section 5 of its Tariff. See <http://www.gpng.com/rates-services/rates-tariffs/>.

The Arrearage Forgiveness Component of Great Plains' GAP consists of a monthly credit that is applied each month after receipt of the Qualified Customer's payment. The credit is designed to retire arrears over a period of up to twenty-four months, with Great Plains matching the Qualifying Customer's contribution to retiring arrears.

Great Plains continues to submit annual GAP compliance reports to the Commission by March 31 of each program year. The Program Year 2018 report was filed with the Minnesota PUC on March 29, 2019 in Docket No. G004/M-19-247

II. PROGRAM EVALUATION

Great Plains evaluation report builds on the data presented in its annual GAP reports submitted by March 31, of each year, and is consistent with the requirements of Minn. Stat. § 216B.16, Subd. 15, by addressing the effect of the GAP on the percentage of income that participating households devote to energy bills; service disconnections; and customer payment frequency, utility collection costs, arrearage level, number of customers in arrears, and bad debt. As noted, this evaluation focuses on Program Years 2016-2018. The reporting form submitted in Great Plains' compliance report for 2018 (Docket No. G004/M-19-247) is also provided here as Exhibit A as the reporting form provides a concise review of the 2016-2018 program years.

A. GAP Participation (2016-2018)

Effective with program year 2015 The Salvation Army began administering Great Plains GAP Program. Great Plains submitted a compliance filing on January 16, 2015, advising the Commission of this change in Docket No. G004/M-07-1235.

In conjunction with The Salvation Army, in 2015 Great Plains took steps to increase outreach efforts and the GAP application was posted to both the Company's and The Salvation Army's websites. Great Plains also sent a direct mailing promoting GAP to all

customers that received LIHEAP assistance during the previous heating season year including a letter explaining the program, an application form, a GAP brochure, and a return mailing envelope addressed to The Salvation Army. Great Plains promoted the availability of GAP to customers calling with credit concerns or those inquiring about or applying for Cold Weather Rule protection. Many GAP applications received were in response to direct mailings by the Company. In particular, a review of the source of the applications based on a coding system used to track applications indicated that the majority of the GAP applications were in response to the letters Great Plains sends directly to customers qualifying for LIHEAP in the prior season (approximately 95% in 2016, 94% in 2017 and 64% in 2018) with the source of the remaining percentage of the applications submitted through the third party Administrator, Administrator's website or Great Plains' website.

Table 1 below provides an overview of GAP and LIHEAP participants and annual program expenditures. As shown, GAP participation increased significantly in 2018. This increase is attributable to a change made in 2018; wherein starting GAP program year 2018 Great Plains considered all LIHEAP or other assistance funds as customer payments.

Table 1

	2016	2017	2018	As Shown on Exhibit A
GAP Applications	355	330	408	
% LIHEAP customer that participated in GAP	3%	4%	18%	Sections 3 and 4
GAP Participants	48	57	238	
Amount Expended ^{1/}	\$7,299	\$8,027	\$40,529	

^{1/} Includes Third Party Administrative Fee

This change allowed:

- 1) More applicants to qualify for the program and not be removed from the program for not making each monthly payment or missing two monthly payments in a row because of the credit balance typically carried once the LIHEAP payment is applied.
- 2) More customers to qualify for the arrear's forgiveness when previously their LIHEAP funds may have paid their arrears balance owing at the time of application and therefore disqualifying customer for that portion of the program.

Total credits awarded to GAP participants in 2016-2018 totaled, \$4,549, \$5,277 and \$37,778.85 respectively. Great Plains paid an administrative fee of \$2,750 to The Salvation Army in program years 2016-2018. As shown on Exhibit A, Section 3, Line 21 Great Plains reinstated the GAP adjustment charge at \$0.01393 per dekatherm (Dk), effective with service rendered on and after June 1, 2017. Exhibit A, Section 3, Line 23 shows the GAP tracker balance as of end of program years 2016-2018. Great Plains collected \$40,998.33 from January through December 2018 for GAP under the surcharge. Great Plains also received a \$10,000 donation from Otter Tail Power Co. (Otter Tail). This donation was the result of Otter Tail's requirement in Docket No. E017/M-17-257 to deposit \$10,000 into an account devoted to funding a low-income program. Otter Tail chose Great Plains' GAP Program to assist its gas customers with funding for the GAP program to meet this requirement.

Great Plains continues with outreach efforts to promote GAP. As in previous years Great Plains provided a separate mailing regarding GAP to all customers that had received LIHEAP benefits during the previous heating season. A GAP bill stuffer was also provided to all customers during the months of October through April. Finally, Great Plains

coordinated with low-income agencies to provide information regarding Great Plains' GAP when applying for heating assistance.

Great Plains cannot definitively determine if the GAP program lowered the percentage of income participants devote to energy bills as Great Plains does not have access to participants' income information. However, the affordability and arrears forgiveness portion of GAP provide bill credits that reduce GAP participants' energy costs from what they would have had to pay for their monthly energy bill if they did not participate in the program. If participants income stays the same, and energy costs are reduced, Great Plains believes the statutory requirement to lower the percentage of income participants devote to energy bills has been met.

B. Financial Review (2016-2018).

Sections 5, 6, 7 and 9 of Exhibit A provides a review of the impacts the program has had upon customer payment frequency, disconnections, arrears, and impact on customer payment history.

As indicated in Exhibit A, participation in GAP appears to have a positive impact on customer payment history, disconnection rates, dollar amount of arrears, and an impact on payment frequency.

C. Cost-effectiveness

Great Plains' Tariff requires a financial evaluation to measure GAP cost-effectiveness analysis from a ratepayer perspective as part of its Program Report to determine whether there is a net benefit or a net cost to ratepayers for the GAP.³ Table 2 below represents the financial analysis of GAP:

³ To the extent necessary, Great Plains requests a waiver of the requirement in its Tariff to provide a discounted cash flow ("DCF") evaluating GAP cost-effectiveness. The Commission grants waivers where, as here, strict enforcement of the Tariff would impose an unnecessary burden on Great Plains. As noted above,

Table 2

GAP Costs	2016	2017	2018
Affordability Component	\$4,358	\$3,994	\$30,299
Arrears Forgiveness	191	1,283	7,479
Administrative Costs – Internal 1/	5,510	6,552	25,457
Administrative Costs – Third Party	2,750	2,750	2,750
Total GAP Costs	\$12,808	\$14,579	\$65,986
GAP Savings	2016	2017	2018
Write Offs	\$916	\$743	\$11,992
Service			
Disconnections/Reconnections	519	704	3,170
Collection Activities	112	136	564
Total GAP Savings	\$1,547	\$1,583	\$15,726
Net Cost to Ratepayers	\$11,261	\$12,996	\$50,260

1/ Costs are estimated based on employee time and not recovered through the GAP charge.

Based on the evaluation of results and a cost-effectiveness review, while there are benefits resulting from the GAP, the costs associated with the program continue to outweigh the benefits. However, Great Plains recognizes that there may be a societal benefit that overrides cost-effectiveness and as Ordered Great Plains will continue its GAP.

D. GAP Surcharge

1. Level of Surcharge

As previously stated, Great Plains re-instated a GAP surcharge of \$0.01393 per dekatherm effective June 1, 2017. Since reinstating the GAP surcharge June 1, 2017 Great Plains has collected a total of \$10,353.77 in 2017 and \$40,998.33 in 2018 and distributed total funds of \$4,548.67 in 2016, \$5,277.23 in 2017 and \$37,778.85 in 2018 as GAP participant benefits either as arrear's forgiveness credits or affordability credits. Great Plains has paid its Third Party Administer an annual fee of \$2,750.

a traditional DCF analysis is not necessary to evaluate the cost-effectiveness of Great Plains' GAP. In addition, Great Plains' allocation of internal resources support the GAP. In June 2017 the GAP surcharge was re-instated at \$0.01393 per dekatherm, and in 2018 the dollars collected closely matched the dollars distributed in program year 2018. In this respect, granting a waiver in this circumstance will not adversely affect the public interest or conflict with any standards imposed by law.

2. Assessment of GAP Surcharge

Great Plains proposes to continue with the GAP surcharge currently in place of \$0.01393 per dekatherm. In the evaluation of the GAP surcharge for this filing, Great Plains updated the assumed participation percentage rate from 10% to 15% rate due to the changes made in qualifying applicants into GAP during program year 2018. Updating the participation rate to 15% results in participants in future years at around 228 customers per year.

Great Plains left the estimated benefit per participant at \$210 for this filing. This results in a total GAP budget \$50,000. Estimated 2019 firm sales of 2,699,591 dk would equate to a GAP surcharge of \$0.01852 DK which is higher than the current surcharge of \$0.01393. However, the GAP tracker balance at the end of program year 2018 was \$27,373.75 and therefore a change in the surcharge rate is not proposed at this time. Great Plains will continue to evaluate the budget on an annual basis and the appropriate surcharge with any changes proposed in a future request.

Great Plains proposes to continue to fund GAP by assessing the surcharge to firm customers (residential and firm general service). The average annual GAP cost to a residential customer is approximately \$1.20 or an average monthly GAP cost of \$.010. A firm general service customer's annual GAP cost is approximately \$6.30 or an average monthly GAP cost of \$0.53.

III. CONCLUSION

Great Plains respectfully requests that the Commission accept this Report in compliance with the Commission's May 22, 2017 Order and approve the GAP surcharge to remain at the current level of \$0.01393 per dekatherm. Great Plains' Exhibit B, reflects the proposed updated tariff sheets:

- Original Sheet No. 5-120 - Affordability Component paragraph, last sentence, remove the verbiage that energy assistance sums will be applied to arrears first and then applied to current bill.
- 3rd Revised Sheet No. 5-122 Evaluation paragraph, update the years applicable for the next evaluation period and due date of next evaluation report.

Dated: May 31, 2019

Respectfully Submitted,

/s/ Tamie Aberle

Tamie Aberle
Director of Regulatory Affairs
Great Plains Natural Gas Co.
a Division of MDU Resources Group, Inc.
400 N. 4th Street
Bismarck, ND 58501

EXHIBIT A

**GREAT PLAINS NATURAL GAS CO.
GAS AFFORDABILITY REPORTING 2018**

Information as required and approved in September 28, 2018 Order-Docket No. G-004/M-16-495

Section Lines		2016	2017	2018
1	Program Dates and Status:			
1	Date program started	1/1/2016	1/1/2017	1/1/2018
2	Program effective date	1/1/2016	1/1/2017	1/1/2018
3	Date next evaluation report due	5/31/2019	5/31/2019	5/31/2019
4	Date last evaluation completed	6/1/2016	6/1/2016	6/1/2016
5	Last evaluation docket number	G-004/M-16-495	G-004/M-16-495	G-004/M-16-495
6	Status of program (pilot or permanent)	Pilot	Pilot	Permanent
7	Date pilot program ends, if applicable		5/22/2017	N/A
8	Date of last Evaluation Order	11/26/2014	5/22/2017	5/22/2017
9	Program administrator	The Salvation Army	The Salvation Army	The Salvation Army
2	Participant benefits			
10	Description of affordability benefit - maximum payment as % of household income	4%	4%	4%
11	Description of arrearage forgiveness benefit - repayment period	Up to 24 Months	Up to 24 Months	Up to 24 Months
12	Average annual income per participant	\$10,761	\$14,599	\$13,900
13	Average annual bill per participant	\$595	\$500	\$642
14	Average arrearage balance per participant	\$165	\$103	\$138
15	Average annual affordability benefit per participant	\$99	\$111	\$171
16	Average annual arrearage forgiveness benefit per customer	\$32	\$32	\$56
17	Average total benefit per participant	\$95	\$93	\$159
3	Cost and Cost Recovery			
18	Annual budget	\$50,000.00	\$50,000.00	\$50,000.00
19	Actual revenue 2018 see explanation at page 7 of report.	\$0.00	\$10,353.77	\$50,998.33
20	Annual cost	\$7,298.67	\$8,027.23	\$40,528.85
21	Surcharge (\$/decatherm)	\$0.00000	\$0.01393	\$0.01393
22	Annual cost of surcharge for average residential customer who uses 900 therms (90 decatherms) of gas per year. Surcharge effective 6/1/2017.	\$0.00	\$0.73	\$1.25
23	Tracker balance as of year-end.	\$14,577.73	\$16,904.27	\$27,373.75
4	Participation			
24	% of LIHEAP customers that participated in GAP	3%	4%	18%
25	Number of participants enrolled as of year-end	28	37	170
26	Number of participants enrolled and receiving benefits at some time during the year	48	57	238
27	Whether a waiting list occurred at any time during the year	No	No	No
28	If so, the number of customers on the waiting list and for how long	N/A	N/A	N/A

**GREAT PLAINS NATURAL GAS CO.
GAS AFFORDABILITY REPORTING 2018**

Information as required and approved in September 28, 2018 Order-Docket No. G-004/M-16-495

5	Impact on disconnect rates	2016	2017	2018
	Disconnection rates - non GAP LIHEAP baseline			
29	GAP participants	4%	5%	4%
30	Non-GAP LIHEAP customers	11%	12%	14%
31	Non-LIHEAP residential customers	3%	3%	4%
	Disconnection rates - pre-program baseline	2016	2017	2018
32	GAP participant cohort	4%	5%	4%
33	GAP participants cohort before they were enrolled in GAP	6%	0%	1%
6	Impact on payment frequency	2016	2017	2018
	Dollars paid ÷ by dollars requested			
	Non-GAP LIHEAP Baseline			
34	GAP participants	Not Available 1/	Not Available 1/	56%
35	Non-GAP LIHEAP customers	Not Available 1/	Not Available 1/	30%
36	Non-LIHEAP residential customers	Not Available 1/	Not Available 1/	94%
	Pre-Program Baseline	2016	2017	2018
37	GAP participants cohort	Not Available 1/	Not Available 1/	56%
38	GAP participant cohort before they were enrolled in GAP	Not Available 1/	Not Available 1/	40%
7	Number of payment made ÷ number of payments requested	2016	2017	2018
	Non-GAP LIHEAP baseline			
39	GAP participants	70%	76%	52%
40	Non-GAP LIHEAP customers	37%	44%	43%
41	Non-LIHEAP residential customers	Not Available 1/	Not Available 1/	86%
	Pre-Program Baseline			
42	GAP participants cohort	70%	76%	52%
43	GAP participant cohort before they were enrolled in GAP	68%	43%	41%
8	Impact on arrears	2016	2017	2018
	% Customers in arrears			
	Non-GAP baseline			
44	GAP participants	10%	26%	20%
45	Non-GAP LIHEAP customers	22%	22%	23%
46	Non-LIHEAP residential customers	15%	14%	15%
	Pre-Program baseline	2016	2017	2018
47	GAP participant cohort	10%	26%	20%
48	GAP participant cohort before they were enrolled in GAP	38%	30%	48%

**GREAT PLAINS NATURAL GAS CO.
GAS AFFORDABILITY REPORTING 2018**

Information as required and approved in September 28, 2018 Order-Docket No. G-004/M-16-495

9	Dollar amount of arrears			
	%Change in dollar amount of arrears (non-GAP LIHEAP baseline)	2016	2017	2018
49	GAP participants	-62%	-23%	35%
50	Non-GAP LIHEAP customers	-49%	-12%	155%
51	Non-LIHEAP residential customers	-6%	18%	34%
	Dollar amount of arrears (pre-program baseline)	2016	2017	2018
52	GAP participants cohort	133.41	\$102.58	\$138.37
53	GAP participant cohort before they were enrolled in GAP	112.78	\$310.00	\$212.77
10	Complaints	2016	2017	2018
54	Number of complaints	0	0	0
55	Nature of complaints	N/A	N/A	N/A
11	Retention	2016	2017	2018
56	GAP participant retention rate	58%	65%	71%
12	Impact on collection activity	2016	2017	2018
57	Brief description of effect of GAP on collection activity	Reduced collections by increasing pymts	Reduced collections by increasing pymts	Reduced collections by increasing pymts
13	Coordination with other programs	2016	2017	2018
58	Page(s) of report where coordination efforts described	Report filed March 31, 2017 pages 13-15 and 17	Report filed on April 2, 2018, Attachment A, page 10	Report filed on March 29, 2019, Attachment A, page 11.

1/ Fields identified above as not available in years 2016-2017. Analysis in prior reporting was not completed for the complete groups, and the data was based on a sample size in these years. The 2018 data is based on the total customers in each group GAP, Non-GAP/LIHEAP, and Non-GAP/Non-LIHEAP.

EXHIBIT B



GREAT PLAINS NATURAL GAS CO.

A Division of Montana-Dakota Utilities Co.

State of Minnesota Gas Rate Schedule – MNPUC Volume 2

Section No. 5
1st Revised Sheet No. 5-120
Canceling Original Sheet No. 5-120

GAS AFFORDABILITY PROGRAM

Availability:

Available to residential customers who have been qualified and receive assistance from the Low Income Home Energy Assistance Program (“LIHEAP”) during the federal fiscal year (“Program Year”). Further, such customers must agree to be placed on a levelized payment plan and must also agree to a payment schedule as described below to be considered a “Qualified Customer”.

Description and Rate Impact for Qualifying Customers:

The Gas Affordability Program (GAP) shall meet the conditions of Minnesota Statutes, Chapter 216B.16, Subd.15 on low income programs. The GAP has two components: 1) Affordability, and 2) Arrearage Forgiveness. Great Plains, or an agent of Great Plains, will review current billing and consumption information, approved LIHEAP benefits and household income information as submitted to Great Plains to determine a Qualified Customer’s payment schedule amount. A Qualified Customer’s payment schedule shall include both payment of the customer’s current month’s bill (which reflects one-twelfth the levelized payment plan), after inclusion of the affordability bill credit, and payment of a portion of the Qualified Customer’s pre-program arrears.

Affordability Component:

The Affordability component consists of a bill credit determined as one-twelfth of the difference between Great Plains’ estimate of the Qualified Customer’s annual gas bill and 4% of the Qualified Customer’s household income as provided by the Qualified Customer to Great Plains. This bill credit is a GAP cost that will be included in the Tracker.

The Affordability Component shall be calculated as follows:

1. Calculate four percent of the participant’s income and add any available LIHEAP funds not applied to arrears to determine the affordability payment.
2. Sum the participant’s annual usage and determine participant’s average annual bill.
3. Subtract the participant’s affordability payment from the average monthly bill to determine the affordability credit amount.

Arrearage Forgiveness Component:

The Arrearage Forgiveness component consists of a monthly credit that will be applied each month after receipt of the Qualified Customer’s payment. The credit will be designed to retire pre-program arrears over a period of up to 24 months,

Date Filed: May 31, 2019

Effective Date:

Issued By: Tamie A. Aberle
Director-Regulatory Affairs

Docket No.:



GREAT PLAINS NATURAL GAS CO.

A Division of Montana-Dakota Utilities Co.

State of Minnesota Gas Rate Schedule – MNPUC Volume 2

Section No. 5

3rd Revised Sheet No. 5-122

Cancelling 2nd Revised Sheet No. 5-122

GAS AFFORDABILITY PROGRAM

administrative costs included in the tracker (except start-up related costs) included in the tracker to 5% of total GAP costs. Administrative costs will include, but are not limited to, the costs to inform customers of the GAP and costs to process and implement enrollments.

Great Plains shall recover the GAP costs in a separate Delivery Charge applicable to all customers receiving firm service under Residential Gas Service and Firm General Service Rate Schedules at a rate of \$0.01393 per dk.

A tracking mechanism ("Tracker") will be established to provide for recovery of all actual GAP costs as compared to the recovery of GAP costs through rates. Great Plains will track and defer GAP costs with regulatory approval. Carrying charges at a rate equal to the authorized rate of return of 7.032% established in Docket No. G004/GR-15-879 shall be applied to the balance and recovered. The prudence of the GAP costs are subject to a regulatory review. Great Plains may petition the Commission to adjust this rate in order to true up the GAP balance in the Tracker in its next general rate case.

Evaluation:

The GAP shall be evaluated for the years 2019 through 2021 with an evaluation filed with the Commission by May 31, 2022.

Annual reports to be submitted by March 31 of each year will include the effect of the GAP on customer payment frequency, payment amount, arrearage level and number of customers in arrears, service disconnections, retention rates, customer complaints and utility customer collection activity. The annual reports may also include information about customer satisfaction with the GAP.

The financial evaluation will include a discounted cash flow of the GAP cost-effectiveness analysis from a ratepayer perspective comparing the 1) total GAP costs, which includes the Affordability component, Arrearage Forgiveness component and total company incurred administration costs, to 2) the total net savings including cost reductions on utility functions such as the impact of the GAP on write-offs, service disconnections and reconnections and collections

Date Filed: May 31, 2019

Effective Date:

Issued By: Tamie A. Aberle
Director-Regulatory Affairs

Docket No.:

Tariffs Reflecting Proposed Changes



GREAT PLAINS NATURAL GAS CO.

A Division of MDU Resources Group, Inc. Montana-Dakota Utilities Co.

State of Minnesota Gas Rate Schedule – MNPUC Volume 2

Section No. 5
Original Sheet No. 5-120

GAS AFFORDABILITY PROGRAM

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The Affordability component consists of a bill credit determined as one-twelfth of the difference between Great Plains’ estimate of the Qualified Customer’s annual gas bill and 4% of the Qualified Customer’s household income as provided by the Qualified Customer to Great Plains. This bill credit is a GAP cost that will be included in the Tracker. ~~Any energy assistance sums not applied to arrears will be applied to a Qualified Customer’s current bill.~~

The Affordability Component shall be calculated as follows:

1. Calculate four percent of the participant’s income and add any available LIHEAP funds not applied to arrears to determine the affordability payment.
2. Sum the participant’s annual usage and determine participant’s average annual bill.
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Date Filed: November 19, 2012

Effective Date: November 19, 2012

Issued By: Tamie A. Aberle
Director-Regulatory Affairs

Docket No.: E,G999/CI-11-1149



GREAT PLAINS NATURAL GAS CO.

A Division of MDU Resources Group, Inc. Montana-Dakota Utilities Co.

State of Minnesota Gas Rate Schedule – MNPUC Volume 2

Section No. 5

2nd Revised Sheet No. 5-122

Cancelling 1st Revised Sheet No. 5-122

GAS AFFORDABILITY PROGRAM

administrative costs included in the tracker (except start-up related costs) included in the tracker to 5% of total GAP costs. Administrative costs will include, but are not limited to, the costs to inform customers of the GAP and costs to process and implement enrollments.

Great Plains shall recover the GAP costs in a separate Delivery Charge applicable to all customers receiving firm service under Residential Gas Service and Firm General Service Rate Schedules at a rate of \$0.01393 per dk.

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The financial evaluation will include a discounted cash flow of the GAP cost-effectiveness analysis from a ratepayer perspective comparing the 1) total GAP costs, which includes the Affordability component, Arrearage Forgiveness component and total company incurred administration costs, to 2) the total net savings including cost reductions on utility functions such as the impact of the GAP on write-offs, service disconnections and reconnections and collections

Date Filed: June 1, 2017

Effective Date: Service rendered on and after June 1, 2017

Issued By: Tamie A. Aberle
Director-Regulatory Affairs

Docket No.: G004/M-16-495