



A Division of Montana-Dakota Utilities Co.

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March 31, 2025

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 East Seventh Place, Suite 350
St. Paul, MN 55101-2147

**RE: Docket No. E,G-999/PR-25-2
In the Matter of Cold Weather Reports (CWR) – Regulated Gas and
Electric Companies**

Dear Mr. Seuffert:

Great Plains Natural Gas Co. (Great Plains), a Division of Montana-Dakota Utilities Co., herewith electronically files its Initial Comments to the February 28, 2025 Notice of Comment Period on Cold Weather Rule Reports for Regulated Gas and Electric Companies (February 28 Notice) in the above referenced docket.

In the February 28 Notice, the Minnesota Public Utilities Commission (Commission) requested regulated gas and electric utility companies respond to requests made in the January 31, 2025 Joint Comments (January 31 Joint Comments) of the Citizens Utility Board of Minnesota (CUB) and the Legal Service Advocacy Project (LSAP) regarding the Recent Utility Cold Weather Rule Data filed in Docket No. E,G-999/PR-24-2.

Great Plains provides the following comments in response to the Topics for Utilities outlined in the February 28 Notice:

Per Appendix A, Request #1, would your utility submit a compliance filing in the instant docket detailing its current policies and practices on disconnections, service deposits, and payment agreements?

Yes, Great Plains would submit a compliance filing in the above referenced instant docket regarding its current policies and practices on disconnection, service deposits, and payment agreements if so ordered by the Commission.

Per Appendix A, Request #2, would your utility display its disconnection, service deposit, and payment agreement policies and practices on your

website, and explain those procedures in clear, easy-to-understand language?

Yes, Great Plains would post the Company's disconnection, service deposits, and payment agreement policies and practices on its website if so ordered by the Commission.

Per Appendix A, Request #3, would your utility post the mock language from CUB and LSAP on its website?

- a. Under Minnesota law, Great Plains Natural Gas Co. customers are entitled to a payment agreement for the payment of overdue bills. This payment agreement must consider a customer's financial circumstances and any extenuating circumstances of the household.**
- b. If the payment agreement terms offered are not affordable to you, or if your household is facing financial or extenuating circumstances, you should contact a Great Plains Natural Gas Co. customers account representative at 877-267-4764 or customerservice@gpng.com.**
- c. If you are unable to reach a mutually agreeable arrangement with a customer account representative, you may appeal the decision with the Minnesota Public Utilities Commission's Consumer Affairs Office. The Consumer Affairs Office can be contacted at 651-296-0406 or 800-657-3782, or by email at consumer.puc@state.mn.us.**

Yes, Great Plains would post the language outlined above as recommended by CUB and LSAP if so ordered by the Commission.

As CUB and LSAP have only recommended the actions listed in Appendix A, and these action have not been Ordered by the Commission, if your utility would not voluntarily comply with the Requests 1-3, please discuss why doing so is unfeasible or inappropriate.

Great Plains' Customer Experience Team members work diligently with customers that are past due and those who are at risk of disconnection by providing the customer with energy assistance information and/or working with customers to set up a payment arrangement to prevent disconnection. Information regarding assistance programs is also provided on the Company's website <https://www.gpng.com/customer-services/assistance-programs/> which also includes links to the Minnesota Cold Weather Rules and the Commission's Customer Service and Billing Rules.

While posting the above outlined information regarding Company policies and the mock language is not unfeasible or inappropriate, Great Plains believes that the language suggested by CUB and LSAP in Request #3 is the most clear and concise method of presenting information to customers on a customer's ability to enter into a payment arrangement where they can successfully make the monthly payments and avoid disconnection as well as contact information for both the Company and

Consumer Affairs Office. Any additional information posted on processes or practices of the Company's may only further frustrate a customer looking for information on what to do when they are past due on their account and looking for direction on options available to them.

As Recommendations 1-3 were brought forward by CUB and LSAP in a Cold Weather docket, the Company believes a Commission order regarding the providing of such information via a compliance filing for Request #1 and the posting of information for customers to meet Requests 2 and/or 3 is appropriate and would complete the process.

If you have any questions regarding this filing, please contact me at (701) 222-7855 or Kristin Stastny at (612) 977-8656.

Sincerely,

/s/ Travis R. Jacobson

Travis R. Jacobson
Vice President of Regulatory Affairs

cc: Kristin Stastny