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December 20, 2018

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: In the Matter of a Commission Investigation into Parameters for Competition among Natural Gas Utilities Involving Duplication of Facilities and Use of Promotional Incentives and Other Payments
Docket No. G999/CI-17-499

Dear Mr. Wolf:

The Commission issued a Notice of Comment Period on December 4, 2018 in the above-referenced docket, specifically in response to Greater Minnesota Gas, Inc.'s (GMG) letter inviting the Commission to clarify its September 19, 2018 Order herein. This letter serves as GMG's initial Comment in response to the Commission's Notice. The Commission posed two topics as being open for comment: whether GMG's letter constitutes a complaint within the meaning of the Commission's Order; and, whether the Commission should clarify its Order as requested in GMG's letter. GMG will address each in turn.

GMG's November 28, 2018 Letter Is Not a Complaint Within the Meaning of the Commission's Order.

GMG did not intend that its letter would constitute a complaint against CenterPoint, either formal or otherwise, as contemplated in Ordering Paragraph 2 of the Commission's Order herein. GMG is not seeking dispute resolution by the Commission, nor was GMG suggesting that CenterPoint should be forced to halt its construction activities until the Commission issues an order. GMG believes that the situation illustrated that there can be confusion in how the Order is interpreted and simply asked for clarification about the precise meaning of the Order so that all utilities interpret it uniformly to preclude future disputes.

GMG Respectfully Requests that the Commission Clarify its Order to Prevent Future Confusion.

As GMG explained in its letter, the language of the Order only expressly prohibits a regulated utility from extending natural gas service to a customer that is already being served by another regulated utility. However, the spirit of the Order and some language in the Order suggest that the Commission intended that its Order would prohibit extension of natural gas service to a



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potential customer that could be served by another utility's existing facilities unless the existing utility does not seek to serve the new customer or duplication of facilities would be otherwise necessary.

GMG understood the Order to prohibit a utility from constructing a parallel main to another utility – no dual-maining on the same street at all. That understanding has informed how GMG has responded to potential customers about its ability to provide service in areas where it is not the only natural gas provider. GMG simply wants to understand the precise meaning of the Order so that it is clear for future planning purposes.

GMG believes that the natural gas utilities and the public would benefit from clarification of whether the Order only prohibits duplication of facilities to serve existing customers currently being served by another utility; whether it prohibits construction of parallel mains to serve prospective customers that could be realistically served by another utility's existing infrastructure; any specific circumstances under which parallel main construction is appropriate (such as system reinforcement); etc..

Uniform interpretation, application, and enforcement of an Order such as the one in question is important for ratepayers and utilities. Hence, GMG believes that clarification would be beneficial. Thus, GMG respectfully requests that the Commission clarify its Order issued herein.

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) 665-8657 and my email address is kanderson@greatermngas.com.

All individuals identified on the official service list have been electronically served with a copy of this letter.

Sincerely,

GREATER MINNESOTA GAS, INC.

/s/

Kristine A. Anderson
Corporate Attorney

Enclosure

cc: Service List