



705 West Fir Ave.
PO Box 176
Fergus Falls, MN 56538-0176
1-877-267-4764

March 31, 2016

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

RE: *Petition for Approval of Great Plains Natural Gas Co. Annual Gas Affordability Program Report, Docket No. G004/M-16-_____*

Dear Mr. Wolf:

Great Plains Natural Gas Co. (Great Plains), a Division of MDU Resources Group, Inc., herewith electronically files its Calendar Year 2015 Gas Affordability Program (GAP) Report in compliance with the Minnesota Public Utilities Commission's Order issued in Docket No. G-004/M-15-306. The Commission Order issued on November 26, 2014, directed future annual GAP filings and reports be filed as miscellaneous tariff filings under Minn. R. 7829.1300 *et seq.*, which will assign new docket numbers for each filing.

If you have any questions regarding this filing, please contact me at (701) 222-7856, or Brian Meloy, Stinson Leonard Street, LLP, 150 South Fifth Street, Suite 2300, Minneapolis, MN 55402, (612) 335-1451.

Sincerely,

/s/ Tamie Aberle

Tamie A. Aberle
Director of Regulatory Affairs

STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
Betsy L. Wergin	Vice Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
John Tuma	Commissioner

In the Matter of the Petition of Great)	
Plains Natural Gas Co.'s Gas for)	Docket No. G004/M-16-_____
Approval of the 2015 Gas Affordability)	
Program Report)	
)	

SUMMARY OF FILING

Great Plains Natural Gas Co., (Great Plains) a Division of MDU Resources Group Inc. submits this Petition for approval of the 2015 Gas Affordability Program (GAP) Report in compliance with Minnesota Statute § 216B.16, Subd. 15 and Orders issued by the Minnesota Public Utilities Commissions in Docket Nos. G-004/M-07-1235 and G-004/M-15-306. Great Plains respectfully requests that the Commission accept its 2015 Gas Affordability Program Report as in compliance with its directives.

STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
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In the Matter of the Petition of Great
Plains Natural Gas Co.'s Gas for
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Program Report)
)
) Docket No. G004/M-16-_____
)
)
)

**PETITION FOR APPROVAL OF GREAT PLAINS NATURAL GAS CO.'S GAS
AFFORDABILITY PROGRAM REPORT PROGRAM YEAR 2015**

I. INTRODUCTION AND SUMMARY

Great Plains Natural Gas Co. (Great Plains) a Division of MDU Resources Group Inc. hereby submits this Petition to the Minnesota Public Utilities Commission (Commission) for approval of Great Plains' Gas Affordability Program Report for calendar year 2015 pursuant to Minnesota Statute § 216B.16, Subd. 15 and Orders issued by the Commissions in Docket No. G-004/M-07-1235 and G-004/M-15-306.

II. BACKGROUND

Great Plains' Gas Affordability Program (GAP) was approved by the Commission in Docket No. G004/M/07-1235 by Order issued on May 12, 2008 and Order issued on September 29, 2015 in Docket No. G-004/M-15-306 extending GAP through program year 2016. 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. The GAP is designed to assist qualified low-income residential customers manage and pay their natural gas bills through the establishment of a new 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 percent of the Qualified Customer's household income as provided by the Qualified Customer to Great Plains.¹ The LIHEAP benefit received by the customer is also considered in determining applicability of the Affordability component.

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. Any energy assistance payments not applied to arrears will be applied to a Qualified Customer's current bill.²

¹ Pursuant to the Commission's Order issued in G-004/M-10-322 on September 30, 2010, Great Plains was authorized to lower the income threshold to qualify for the Affordability Component to 4 percent. Effective with applications received for Program Year 2011, the 4 percent income threshold was utilized to determine if a customer qualifies for the Affordability Component.

² Great Plains maintains service and suspends collection activities to Qualified Customers if they continue to make payments under their payment schedule. If a Qualified Customer fails to pay two consecutive monthly payments in full under the Program, they are terminated from the Program and subject to Great Plains' regular collection practices, including the possibility of disconnection.

Through Program Year 2010, Great Plains administered its own GAP, while working actively with community action partnership agencies. This required Great Plains to review current billing and consumption information, approved LIHEAP benefits and household income information submitted to Great Plains to determine a Qualified Customer's payment schedule amount.³ Effective with Program Year 2011, Great Plains entered into an agreement with West Central MN Communities Action, Inc. (West Central) to serve as the third-party administrator of its GAP. The Commission approved West Central as the third-party administrator of Great Plains' GAP by Order dated March 30, 2011. In November 2014, Great Plains' signed an agreement with The Salvation Army, Roseville, Minnesota to administer Great Plains' GAP for program year 2015. Great Plains advised the Commission of this change in its compliance filing submitted on January 16, 2015 in Docket No. G-004/M-07-1235.

III. GENERAL FILING INFORMATION

Pursuant to Minn. Rules Part 7825.1300, Subpart 3, Great Plains provides the following general information:

Utility:	Great Plains Natural Gas Co. A Division of MDU Resources Group, Inc.
Company's Attorney:	Brian M. Meloy Stinson Leonard Street 150 South 5 th Street, Suite 2300 Minneapolis, MN 55402 Telephone: 612-335-1451

³ A Qualified Customer's payment schedule includes 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 Customers pre-program arrears.

Date of Filing	March 31, 2016
Proposed Effective Date	May 31, 2016
Controlling Statute for Time in Processing the Filing	NA
Utility personnel authorizing the filing and to whom copies of correspondence, pleadings and notices should be sent	Tamie A. Aberle Director of Regulatory Affairs Great Plains Natural Gas Co. 400 North 4 th Street Bismarck, ND 58501

IV. DESCRIPTION OF FILING

A. Petitioner

Great Plains is a Minnesota public utility as defined in Minn. Stat. § 216B.02, Subd. 4 and operates as a Division of MDU Resources Group Inc. Great Plains is engaged in business as a natural gas local distribution company serving 18 communities in Minnesota and one community in North Dakota. Great Plains currently provides natural gas utility service to approximately 21,221 Minnesota customers and 2,191 customers in North Dakota.

B. Annual GAP Reporting Requirements

In its May 12 Order approving Great Plains' GAP, the Commission directed Great Plains to provide the following information in its annual GAP Reports:

- (1) An evaluation of the assumed GAP participation rate of five percent in light of actual participation in the Program;
- (2) The actual annual average cost per participant for the Program, and to provide a discussion concerning any deviation of the actual annual average cost per participant compared to the assumed average annual cost per participant of \$555; and
- (3) The Company's conclusion regarding the reported evaluation data, together with the Company proposal concerning the GAP on a going forward basis.

Subsequently, in its November 18 Order, the Commission required all gas utilities to file additional data in their annual GAP Reports, including:⁴

- A. *Customer Payment Frequency:* A comparison of the payment frequency for customers in GAP to payment frequency before they were enrolled in GAP, plus a comparison of the payment frequency for GAP participants to the payment frequency for LIHEAP grant recipients. Great Plains was allowed to provide data based on a random sample of ten percent of their GAP customers and an equal number of LIHEAP customers.
- B. *Disconnection:* The percentage of GAP customers disconnected compared to the percentage of all firm customers disconnected, in addition, a comparison of the percentage of GAP customers disconnected to the percentage of disconnected LIHEAP customers that do not participate in GAP.
- C. *Payment Amount:* The average annual and monthly bill credit amount in the utility's annual GAP reports. In addition, a comparison of these amounts to the average GAP participant's annual and average monthly bill and arrearage amount.

⁴ Great Plains' GAP Tariff similarly requires Great Plains to provide information regarding "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."

- D. *Customer Payment History:* The number of GAP participants that paid their bills in full each month before and during their participation in the GAP. In addition, information about the number of customers that made partial or no payments. Great Plains was allowed to provide data based on a random sample of ten percent of their GAP customers.
- E. *Arrearage level:* the change in the arrearage level for the average GAP customer compared to the LIHEAP customers that are not enrolled in the GAP and the arrearage level for all of the utility's residential customers. Great Plains was allowed to provide data based on a random sample of ten percent of their GAP customers and an equal number of LIHEAP customers.
- F. *Coordination with the other available low-income bill payment assistance and conservation resources:* information relating to how each utility has coordinated its GAP with other available low income and conservation resources naming the agencies the utility has coordinated with, how the utility has communicated with those agencies during the year, the content of those communications, and what was accomplished in terms of coordination.

With respect to reporting requirements A, D, and E above, the Commission required Great Plains to randomly sample 10 percent of its GAP customers (and, where comparison to a larger group of its customers is required, to sample an equal number of the utility's other customers).

In its September 22, 2010 *Order Accepting Gas Affordability Programs Reports, Deferring Action on Another, and Requiring Further Action*, the Commission directed all gas utilities to provide information on GAP complaints in their annual GAP Reports.

In its December 29, 2011 *Order Accepting Gas Affordability Programs Reports and Requiring Further Action*, the Commission directed all gas utilities to implement an application processing goal, assess periodically whether the use of their third-party administrator is the most effective and efficient arrangement, require the third-party administrator to make the GAP application available on their web site, provide

reminders to GAP participants when payments are missed and cross-promote GAP with other programs.

In its September 25, 2013 Order, the Commission required the gas utilities to include a summary schedule with their annual gas affordability filing that included detailed information ranging from the average annual affordability benefit received per customer to the GAP tracker balance as of year-end.

In its November 26, 2014 Order, the Commission directed Great Plains to continue to file annual GAP compliance reports by March 31 of each year, and to include the following information in its next report:

- An update on the number of customers enrolled and participating in the program.
- An update on Great Plains' negotiations with potential alternative administrators for its gas affordability program, and the associated benefits and costs.
- Outreach methods that Great Plains has employed, or could employ, to increase participation in the program.

In its September 29, 2015 Order, the Commission directed Great Plains to:

- 1) Explain why the Company does not assess the GAP surcharge against Interruptible Sales and Transportation Customers.
- 2) Provide a proposal evaluating cost allocation methods for its GAP program.
- 3) The recalculated surcharge for various alternatives if Interruptible Sales and Transportation Customers were included.

In compliance with the Commission's directives, Great Plains provides its Calendar Year 2015 Gas Affordability Program Report covering the period January 1, 2015 through December 31, 2015. Great Plains addresses the requirements of each of the seven Commission Orders in turn.

V. 2015 ANNUAL GAP REPORT

A. May 12, 2008 Order Reporting Requirements.

1. An evaluation of the assumed GAP participation rate.

In calendar year 2015, Great Plains received 438 GAP applications representing an increase of 4 percent from calendar year 2014, while LIHEAP Applications filed in 2015 for Great Plains' customers decreased 11.65 percent from 2014 LIHEAP applications. Of the 438 applications received, 215 qualified for the GAP by virtue of their eligibility for LIHEAP and 179 customers were ultimately enrolled in GAP – qualifying for an affordability credit and/or arrearage forgiveness credit. A contributing factor of applicants not qualifying for GAP in 2015 is associated with the lower cost of gas that contributes to the lower annual gas bill and 4% of qualified customer's household income. Customers exceeding this limit did not qualify for the affordability component of the program. In program year 2015 after application of the LIHEAP benefits customers did not have an arrears balance outstanding and therefore would not qualify for the arrearage forgiveness portion of the program. Qualifying applicants not eligible for the affordability credit or the arrearage forgiveness credit entered into a payment plan.

The number of GAP participants qualifying for benefits under GAP represents 1 percent of the Company's total residential customers, and 11 percent of the customers qualifying for LIHEAP. A review of the source of the applications based on a coding system used to track applications indicates the majority of the responses (95 percent) were in response to the letters Great Plains sent directly to customers qualifying for LIHEAP in the prior season, 2.2 percent of the applications were distributed by the

third party administrator, 1.4 percent printed from the 3rd party administrators website with the source of the remaining 1.4 percent of the submitted applications being Great Plains' website.

2. Actual annual average cost per participant.

Great Plains collected \$0 from customers for GAP funding for the period January 1, 2015 through December 31, 2015 as authorized by the Commission⁵. Bill credits and arrearage forgiveness amounts totaling \$37,677.76 were issued to participating customers during program year 2015, and actual program costs in program year was \$40,427.76 (inclusive of the \$37,677.76 issued to customers).

This is an increase of approximately 26 percent from the amount of GAP credits and arrearage forgiveness dollars expended in 2014. The actual 2015 average cost per participant, qualifying for credits under the Program was \$210.49 compared to the original assumed average annual cost per participant of \$555. This difference may be attributed primarily to the number of customers that do not enter the program with arrears, the number of customers that continue to exceed the current household income requirement and lower gas costs.

In program year 2015, 41 percent of customers applying for GAP had an arrears balance at the time of application (prior to applying LIHEAP funds) compared to 22 percent of customers with an arrears balance coming into program year 2014. The total arrears balance owing after applying LIHEAP funds for qualified customers in 2015 program year equaled \$9,594.68 for 53 accounts compared to an arrears

⁵ The GAP surcharge was set to \$0.0 per dk effective with service rendered on and after October 19, 2012 pursuant to the Commission's Order issued on October 15, 2012. Great Plains was authorized to continue the GAP program in the Order issued on November 26, 2014, granting a two year extension of Great Plains' pilot Gas Affordability Program until December 31, 2016, and authorizing Great Plains to continue the GAP surcharge of \$0.0 per dk through the end of the 2016 program year.

balance owing of \$19,732.38 associated with the 97 accounts in program year 2014. The average annual arrearage forgiveness benefit received per customer was \$57.74 in the 2015 program year compared to \$60.87 in program year 2014. Great Plains had 28 customers that were enrolled in the program that stopped making the required payments, 17 customers that moved and 1 customer that declined and therefore were dropped from the GAP 2015 program resulting in 133 customers enrolled in the program at the end of program year 2015. The Salvation Army was operating as Great Plains' third party administrator in program year 2015 and program promotions continue in order to increase participation and help ensure that available funds are provided to Qualified Customers.

Finally, the GAP fund balance as at end of program year 2015 was \$21,876.40. Based on the level of participation and program year 2015 GAP expenditures, if the GAP continues beyond 2016, a change in the GAP surcharge of \$0.0 per dk will be necessary. Great Plains will address this issue when it files its GAP evaluation in June 2016. With respect to timing, Great Plains will request that any Commission Order directing or authorizing the continuation of the GAP beyond 2016 be issued prior to the fall of 2016 to ensure that Great Plains is in a position to adequately promote the program for the 2016-2017 winter heating season.

3. Company's conclusion regarding the reported evaluation data.

Great Plains implemented a number of significant changes to its GAP beginning in late 2010, including (1) lowering the income threshold to qualify for the Affordability Component from 6 percent to 4 percent; (2) working with the Commission's Consumer Affairs Office (CAO) in developing and implementing a comprehensive GAP outreach

plan and refining the GAP application; and (3) negotiation of an agreement to have West Central act as a third-party administrator of Great Plains' GAP beginning in 2011.⁶ Program year 2015 remained in line with the number of customers that enrolled in GAP compared to program year 2014 which had shown an increase in participants from 2013 and showed an increase in the benefit to customers in the affordability credit and a slight decrease in benefit to customers in the arrears forgiveness plan. Great Plains selected The Salvation Army as the third party administrator for program years 2015 and 2016 and along with The Salvation Army, Great Plains will continue to promote GAP.

B. November 18, 2009 Order Reporting Requirements.

1. Customer Payment Frequency

Great Plains looked at a random sample of ten percent of the 179 customers enrolled in GAP in 2015. The random sample of 18 customers was compared to a random sample of the same number of customer qualifying for LIHEAP, but not participating in GAP.

As a means of measuring the payment frequency of the two customer groups, the number of payments was compared to the number of bills issued during the period January 1, 2015 through the end of 2015. The results from the program year 2015 random sample indicate that the number of payment occurrences as a percentage of bills issued for the GAP participant group was 72 percent. The number of payment

⁶ Under the Agreement, West Central, with support from the Minnesota Office of Energy Programs, will: (a) actively inform LIHEAP applicants of the Company's GAP and the potential benefits of the program; (b) determine customer GAP eligibility based upon Great Plains' Commission-approved GAP Tariff, (c) work with customers to establish monthly bill and the applicable monthly GAP credit; (d) transmit information regarding monthly average bill amount and applicable credit to Great Plains; (e) promote the GAP in conjunction with Great Plains, and (f) provide customer support to customers regarding GAP.

occurrences as a percentage of bills issued for the LIHEAP group not participating in GAP was 61 percent for the same time period, indicating a benefit associated with GAP.

2. Disconnection

A review of customer accounts disconnected because of non-payment in 2015 revealed that a total of 819 accounts were disconnected for non-payment and included 14 customers receiving GAP credits and 274 customers receiving LIHEAP within the calendar year. LIHEAP accounts were not disconnected at the time when LIHEAP benefits were available. The percentage of GAP customers disconnected as compared to the total customers disconnected was 7.8 percent. The percentage of LIHEAP customers not participating in GAP disconnected compared to the number of all firm customers disconnected was 19 percent indicating a benefit associated with GAP.

3. Payment Amount

The total funds disbursed in 2015 totaled \$37,677.76 for an average annual benefit of \$210.49 per participant qualifying for a credit or arrearage forgiveness. The average GAP participant's annual natural gas bill was \$803.30 or \$66.94 per month on average.

4. Customer Payment History

Based on the sample of GAP participants, approximately 72 percent of the sample group paid their monthly bill in full while participating in GAP. In contrast, 61 percent of sample group of Applicants that qualified for LIHEAP but not GAP in current program year paid their bill in full monthly in program year 2015.

5. Arrearage Level

Based on the sample data, four of the 2015 GAP participants were in arrears averaging \$36.20 as of December 2015 as compared to average arrears per accounts as of December 2015 for all other customers at \$89. LIHEAP customers in the 2014-2015 season not participating in GAP had an average outstanding debt of \$187 as of December 31, 2015. The results indicate a benefit associated with GAP.

6. Coordination with other available low-income bill payment assistance and conservation resources

Great Plains regularly coordinates with the following agencies providing bill payment assistance in the Great Plains' service area.

- Tri-Valley Opportunity Council, Inc.
- West Central Minnesota Communities Actions, Inc.
- Prairie Five Community Action Council, Inc.
- Western Community Action Partnership
- Mahube-Otwa Community Action Partnership, Inc.
- Renville County Energy Assistance Program

As noted above, Great Plains entered into an agreement with West Central to serve as the third-party administrator of its GAP beginning in 2011. Effective with program year 2015 The Salvation Army began serving as Great Plains' third-party administrator of GAP. Great Plains also continues to work with each of the other agencies providing assistance in its service territory to ensure customers are aware of the GAP by advising the agencies of the availability of the program via written and oral communication and providing GAP application forms to the agencies to provide to

Great Plains customers. Such applications were submitted to The Salvation Army, who coordinated with Great Plains and the various agencies. Great Plains believes that the coordination with these agencies continues to promote the awareness of and interest in the GAP.

C. September 22, 2010 Order Reporting Requirements.

1. GAP Complaints

Pursuant to the Commission's Order issued on September 22, 2010, Great Plains reports that no complaints were received from the Commission and only one customer contacting the Call Center asked to speak to a Supervisor regarding their concern about making a GAP payment in a timely manner.

D. December 29, 2011 Order Reporting Requirements.

1. Application Processing Goal

Great Plains has implemented a goal of processing ninety-five percent of all complete gas affordability program applications within thirty days of receipt and in calendar year 2015 all applications were processed within 30 days of receipt.

2. Third-Party Administrator Evaluation

Great Plains' changed its GAP administrator for program year 2015 in an attempt to garner more interest in the program and take advantage of the expanded capabilities of The Salvation Army.

3. GAP Application Availability

The Salvation Army, Great Plains' third party administrator in program year 2015, did make the GAP application available electronically on their website. Great

Plains also provides information on its website regarding the program as well as the application form.

4. Reminder After Missed Payment

Great Plains called its GAP customers after one missed payment as a reminder of the payment requirements for the program. However, twenty-eight customers were removed from GAP due to failure to make their scheduled payments.

5. Cross Promotion of Gap

Great Plains has included information regarding GAP on its website and in bill inserts along with bill payment and conversation program information. Great Plains' credit representatives are promoting GAP when working with Great Plains customers regarding credit situations. Great Plains will continue to look for ways to inform customers of the availability of the program.

E. September 25, 2013 Order Reporting Requirements.

In its September 25, 2013 Order, the Commission required the gas utilities to include a summary schedule with their annual gas affordability filing that included the following information:

	<u>2015 Program Year</u>
1.) Average annual affordability benefit received per customer.	\$217.44
2.) Average annual arrearage forgiveness benefit received per customers.	\$57.74
3.) Percentage of LIHEAP customer that participated in GAP.	11.22%
4.) Disconnection rates:	
a.) Of GAP customers	7.82%
b.) Of LIHEAP-non GAP customers	19.34%
c.) Non-LIHEAP (All firm customer including C&I)	2.70%
5.) Number of GAP participants enrolled as of year-end.	133
6.) Number of GAP Participants enrolled and receiving benefits at some time during the year.	174
7.) Annual program budget.	\$50,000

8.) Actual program revenue.	\$0
9.) Actual program costs.	\$40,427.76
10.) GAP tracker balance as of year-end	\$21,876.40
11.) GAP rate-affordability surcharge (\$/therm).	\$0

F. November 26, 2014 Order Reporting Requirements.

1. Within 10 days, submit revised tariff sheets continuing Great Plains' pilot gas affordability program for an additional two years.

Great Plains submitted the required compliance tariff sheets as shown in the acknowledgement of compliance submission receipt dated February 3, 2015.

2. Make an informational filing notifying the Commission if Great Plains changes its program administrator or makes a significant change in its outreach program.

In Great Plains' January 16, 2015 filing, the Company advised the Commission that The Salvation Army of Roseville, MN will be the third party administer of GAP starting in program year 2015.

3. Continue to file annual GAP compliance reports by March 31 of each year, and include the following information in its next report:
 - a. An update on the number of customers enrolled and participating in the program.

Great Plains enrolled a total of 179 customers in GAP for program year 2015. At the end of program year 2015 Great Plains had 133 customers enrolled in GAP.

- b. An update on Great Plains' negotiations with potential alternative administrators for its gas affordability program, and the associated benefits and costs.

Great Plains advised the Commission in the January 16, 2015 filing that Great Plains signed a contract with The Salvation Army of Roseville, MN to administer GAP for program year 2015. To date, Salvation Army is processing all applications for Great Plains' GAP in a timely manner, have posted the GAP application on their website and are promoting and fielding applications and calls regarding GAP for application year 2015 and will continue through program year 2016.

- c. Outreach methods that Great Plains has employed, or could employ, to increase participation in the program.

Great Plains outreach efforts include: Direct mailing to all customers that received heating assistance in previous heating season, posting of application on Great Plains and third party administrator websites, billing inserts to customers advising of GAP running monthly throughout the winter season, providing information regarding where to apply and contact information for questions. Information and applications forms were also provided to all energy assistance agencies in Great Plains' service territory and Great Plains has adopted the practice to discuss GAP with customers that apply for the Cold Weather Rule protection.

4. File an evaluation report by June 1, 2016. Great Plains will file the required evaluation report by June 1, 2016.

G. September 29, 2015 Order Reporting Requirements.

- 1.) Explain why the Company does not assess the GAP surcharge against Interruptible Sales and Transportation Customers
- 2.) Provide a proposal evaluating cost allocation methods for its GAP program
- 3.) The recalculated surcharge for various alternatives if Interruptible Sales and Transportation Customers were included.

Currently, Great Plains is not assessing a surcharge to any customer's to fund the Gas Affordability Program. The GAP surcharge was set to \$0.0 per dk effective with service rendered on and after October 19, 2012 pursuant to the Commission's Order issued on October 15, 2012. Great Plains was authorized to continue the GAP program in the Order issued on November 26, 2014, granting a two year extension of Great Plains' pilot Gas Affordability Program until December 31, 2016, and authorizing Great Plains to continue the GAP surcharge of \$0.0 per dk through the end of the 2016 program year. The November 26, 2014 Order also directed Great Plains to file an Evaluation Report by June 1, 2016. Great Plains is proposing to address the Commission's three September 29, 2015 Order Reporting Requirements in the June 2016 Evaluation Report.

VI. The Proposal

Great Plains respectfully requests that the Commission accept its 2015

Calendar Year Gas Affordability Program Report as in compliance with its May 12, 2008, November 18, 2009, September 12, 2010, December 29, 2011, October 5, 2012, September 25, 2013 and November 26, 2014 Orders issued in Docket No. G-004/M-07-1235, and allow Great Plains to address the information requirements issued In Order dated September 29, 2015 in Docket No. G-004/M-15-306 in the upcoming evaluation report filing requirement due on June 1, 2016.

Dated: March 31, 2016

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