



1900 Cardinal Lane
Faribault, MN 55021
Toll Free: (888) 931-3411
www.greatermngas.com

June 5, 2024

VIA ELECTRONIC FILING

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

Re: In the Matter of Greater Minnesota Gas, Inc.'s Petition for Approval of 2023 Energy Conservation and Optimization Program Tracker Account and Proposed Conservation Cost Recovery Adjustment
Docket No. G-022/M-24-_____

Dear Mr. Seuffert:

Attached hereto, please find Greater Minnesota Gas, Inc.'s Petition for Approval of 2023 Energy Conservation and Optimization Program Tracker Account and Proposed Conservation Cost Recovery Adjustment for filing in a new docket. A copy of the proposed tariff sheet is included as is a redlined comparison.

Pursuant to Minn. Rule 7829.1300, subp. 2, GMG has served a copy of this filing on the Office of Attorney General – Residential Utilities Division. A summary notice of the filing will be provided to other parties pursuant to Minn. Rules 7825.2840 and 7829.1300, subp. 2. All individuals on the attached service list have been electronically served as appropriate.

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) 209-2110 and my email address is kanderson@greatermngas.com.

Sincerely,

GREATER MINNESOTA GAS, INC.

/s/

Kristine A. Anderson
Corporate Attorney

Enclosures
cc: Service List

**STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

Katie Sieben
Hwikwon Ham
Valerie Means
Joe Sullivan
John Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

Docket No. G022/M-24-_____

In the Matter of Greater Minnesota
Gas, Inc.'s Petition for Approval of
2023 Energy Conservation and Optimization
Program Tracker Account and Proposed Conservation
Cost Recovery Adjustment

SUMMARY OF FILING

Please take notice that on June 5, 2024, Greater Minnesota Gas, Inc. (GMG) filed a Petition for Approval of 2023 Conservation Improvement Program Tracker Account and Conservation Cost Recovery Adjustment Factor with the Minnesota Public Utilities Commission. The Petition seeks to set GMG's Conservation Cost Recovery Adjustment at \$0.4407 per Dth, effective on the first day of the month following approval.

Dated: June 5, 2024

Respectfully submitted,

/s/ Kristine A. Anderson
Kristine A. Anderson
Corporate Attorney
Greater Minnesota Gas, Inc.
1900 Cardinal Lane
Faribault, MN 55021
Phone: 507-209-2110

**STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

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Docket No. G022/M-24-_____

In the Matter of Greater Minnesota
Gas, Inc.'s Petition for Approval of
2023 Energy Conservation and Optimization
Program Tracker Account and Proposed Conservation
Cost Recovery Adjustment

**PETITION FOR APPROVAL OF
2023 ECO TRACKER AND
PROPOSED CCRA ADJUSTMENT**

Greater Minnesota Gas, Inc. (GMG), hereby submits its 2023 Energy Conservation and Optimization Program, formerly known as its Conservation Improvement Program, Tracker Account information; and it proposes to adjust its Conservation Cost Recovery Adjustment (CCRA) to \$0.4407 per dekatherm (Dth), effective on the first day of the month following approval.

SUMMARY OF FILING

Pursuant to Minnesota Rule Part 7829.1300, Subpart 1, a one-paragraph summary of this filing, sufficient to apprise potentially interested parties of its nature and general content, accompanies this Petition.

SERVICE ON REQUIRED AND INTERESTED PARTIES

Pursuant to Minnesota Rule Part 7829.1300, Subpart 2, GMG served a copy of this filing on the Residential Utilities Division of the Office of the Attorney General. Pursuant to Minnesota Rule Part 7825.2840, GMG served the Summary of Filing on all parties reflected on the accompanying Certificate of Service and Service List.

GENERAL FILING INFORMATION

Pursuant to Minnesota Rule Part 7829.1300, Subpart 3, the following specific content is provided:

A. Name, Address and Telephone Number of the Utility

Greater Minnesota Gas, Inc.
1900 Cardinal Lane
Faribault, MN 55021
Telephone: (888) 931-3411

B. Name, Address and Telephone Number of the Attorney for Utility

Kristine A. Anderson
Corporate Attorney
Greater Minnesota Gas, Inc.
1900 Cardinal Lane
Faribault, MN 55021
Telephone: (507) 209-2110

C. Date of Filing and Proposed Effective Date of Rate Change

Date Filed: June 5, 2024
Proposed Effective Date: First day of month following approval

D. Statute Controlling Time Frame for Processing Filing

Minn. Stat. § 216B.16, subd. 1, permits a utility to place a rate change into effect subsequent to 60 days' notice to the Commission, unless the rate change is suspended under Minn. Stat. 216B.16, subd. 2. Further, Minn. Stat. § 216B.16, subd. 6b and subd. 6c allow public utilities to file rate schedules providing for annual recovery of actual conservation costs and approved incentives. Under Minn. R. 7829.0100, subp. 11, this Petition constitutes a miscellaneous filing because no determination of the Company's general revenue requirements is necessary. Minn. R. 7829.1400, subp. 1, permits initial comments on miscellaneous filings to be made within 30 days of filing and reply comments 10 days thereafter.

E. Utility Employee Responsible for this Filing (and Signature):

/s/ Kristine A. Anderson
Kristine A. Anderson, Esq.
Corporate Attorney

DISCUSSION

GMG's proposed CCRA herein is predicated on a forward-looking calculation to target as close to a \$0.00 Tracker balance at the end of 2025 as possible. While, at first glance, GMG's proposed CCRA appears to be dramatic, GMG notes that the anticipated rate impact on residential bills is relatively insubstantial at approximately \$1.73 per month.

GMG will update the previously-approved bill message language for inclusion with bills in the month immediately following issuance of an Order in the instant docket and will notify customers that:

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.

GMG's ECO Tracker activity and actual balance as of December 31, 2023, is reflected in Attachment A, which demonstrates that GMG's CIP Tracker balance as of that date was under-recovered by \$415,344. Similarly, GMG's projected Tracker balance as of December 31, 2024, which assumes implementation of the adjusted CCRA in September 2024, is set forth in Attachment B; and, the projected balance demonstrates a likelihood of being under-recovered by \$350,414 at the end of 2024. Finally, GMG's projected Tracker balance as of December 31, 2025, which takes its proposed CCRA adjustment into account, is illustrated in Attachment C and projects a year-end balance of a \$19 under-recovery. Since that meets the goal of the Department's preferred calculation methodology by bringing the balance very near to \$0.00 at year-end, GMG proposes that its CCRA be set at \$0.4407 per Dth, effective on the first day of the month following approval. A proposed revised tariff sheet, along with a redline showing the change, is appended hereto as Attachment D. Since CIP expenditures for June through December 2024 and for all of 2025 are merely projected based on GMG's triennial budget, it is possible that the actual Tracker balance at the end of 2024 could vary significantly from projections. GMG will submit an updated Tracker identifying actual expenditures for 2024 and, if appropriate, will request adjustment of its CCRA at that time.

GMG acknowledges that it has been remiss not seeking annual CCRA adjustments based on its actual spending and trackers, as the CCRA increase may have been more incremental. Nevertheless, significantly warmer weather than normal which reduced sales and, therefore, recovery, and increases in required ECO spending combined to result in a quickly escalating unexpected level of under-recovery. GMG has implemented new processes for maintaining and reviewing the Tracker and does not anticipate future lags in Tracker and CCRA reviews.

REQUEST FOR COMMISSION ACTION

GMG respectfully requests that the Commission approve its 2023 ECO Program Tracker Account and, similarly, that it approve GMG's proposal to set its Conservation Cost Recovery Adjustment (CCRA) at \$0.4407 per Dth, effective on the first day of the month following approval.

Dated: June 5, 2024

Respectfully submitted,

/s/ Kristine A. Anderson
Kristine A. Anderson
Corporate Attorney
Greater Minnesota Gas, Inc.
1900 Cardinal Lane
Faribault, MN 55021
Phone: 507-209-2110

Attachment A
2023 ECO Tracker Balance

[illegible]

Attachment B

2024 Projected ECO Tracker Balance

[illegible]

Attachment C
2025 Projected ECO Tracker Balance

[illegible]

Conservation Improvement Program Adjustment Rider (Continued)

Section V
3rd Revised Sheet No. 27

Recoverable Conservation Improvement Expense shall be the incremental Conservation Improvement Program costs, including approved incentives, not recovered through base rates as estimated for a designated period. The Program costs shall be recovered from customer class using the current sales forecast.

The applicable rate that will be assessed to all non-CIP exempt customers in each rate class is:

Base Charge	Adjustment
CCRC (included in	CIP Adjustment
<u>distribution charge)</u>	<u>Factor</u>
\$0.0413 / Dth	\$0.4407 / Dth

For each designated twelve (12) month period, an annual reconciliation will be determined based upon actual annual conservation costs incurred by GMG compared with annual conservation costs recovered from volumes of gas sold. The annual cost recovered is the product of the total unit rate used in calculating the CIP during the twelve (12) month period and the applicable gas sales volumes during the period when each of the total unit rates were in effect. The difference between actual cost and recovered cost will be used in calculating the annual CIP Adjustment Factor for the next twelve (12) month period. The CIPR factor will be applied to customers' billings for the designated period and will be in effect for a twelve (12) month period. Any under or over-recovery due to the CIP Adjustment Factor will be included in the calculation of the CIP Adjustment Factor for the following period in order to collect from or return to customers the under or over-recovered amount.

Date Filed: June 5, 2024
By: Cody Chilson, President

Effective Date: _____

Docket No. G022/M-24-_____

Order Date: _____

Conservation Improvement Program Adjustment Rider (Continued)

Section V
~~2nd~~-~~3rd~~ Revised Sheet

No. 27

Recoverable Conservation Improvement Expense shall be the incremental Conservation Improvement Program costs, including approved incentives, not recovered through base rates as estimated for a designated period. The Program costs shall be recovered from customer class using the current sales forecast.

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Base Charge	Adjustment
CCRC (included in distribution charge)	CIP Adjustment Factor
\$0.0413 / Dth	\$0. 1965-4407 / Dth

For each designated twelve (12) month period, an annual reconciliation will be determined based upon actual annual conservation costs incurred by GMG compared with annual conservation costs recovered from volumes of gas sold. The annual cost recovered is the product of the total unit rate used in calculating the CIP during the twelve (12) month period and the applicable gas sales volumes during the period when each of the total unit rates were in effect. The difference between actual cost and recovered cost will be used in calculating the annual CIP Adjustment Factor for the next twelve (12) month period. The CIPR factor will be applied to customers' billings for the designated period and will be in effect for a twelve (12) month period. Any under or over-recovery due to the CIP Adjustment Factor will be included in the calculation of the CIP Adjustment Factor for the following period in order to collect from or return to customers the under or over-recovered amount.

Date Filed: ~~October 22, 2021~~ June 5, 2024
By: Cody Chilson, President

Effective Date: January 1, 2022

Docket No. G022/M-~~21-30624-~~

Order Date: ~~October 22, 2021~~

CERTIFICATE OF SERVICE

I, Kristine Anderson, hereby certify that I have this day served a true and correct copy of the following document to all persons at the addresses indicated on the attached list by electronic filing and service or by depositing the same enveloped with postage paid in the United States Mail at Faribault, Minnesota, each as shown on the attached list:

**Greater Minnesota Gas, Inc.'s Petition for Approval of 2023
Energy Conservation and Optimization Program Tracker Account
and Proposed Conservation Cost Recovery Adjustment**

Docket No. G-022/M-24-_____

filed this 5th day of June, 2024.

/s/ Kristine A. Anderson
Kristine A. Anderson, Esq.
Corporate Attorney
Greater Minnesota Gas, Inc.

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2024
Robin	Burke	rburke@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2024
Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2024
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2024
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2024
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2024
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2024
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2024
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2024