



A Division of Montana-Dakota Utilities Co.

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June 28, 2024

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

**RE: Docket No. G004/M-24-____
Demand Entitlement Filing**

Dear Mr. Seuffert:

Great Plains Natural Gas Co. (Great Plains), a Division of Montana-Dakota Utilities Co. (Montana-Dakota), herewith electronically submits its Demand Entitlement Filing pursuant to Minnesota Rule 7825.2910, Subpart 2 for the 2024-2025 winter heating season.

As shown on Exhibit B, Great Plains is proposing a net decrease of 4,000 dk per day from its current Demand Entitlement Quantity. Great Plains plans to release 8,291 dk per day on Viking Gas Transmission (VGT) capacity as fully described below. The additional release is due to the WBI Energy Transmission Pipeline Project (Wahpeton Expansion Project) completion, which results in Wahpeton, North Dakota customers no longer taking service through Great Plains' system as of November 1, 2024.

In support of the filing, Great Plains has attached the following exhibits:

Exhibit A – Design Day Capacity Requirements
Exhibit B – Capacity Portfolio and Capacity Release
Exhibit C – Rate Impacts
Exhibit D – Demand Entitlement Analysis

Design Day Capacity Requirements

In compliance with the determinations made in Docket No. G004/M-03-303 and its Agreement with the Department, Great Plains performed a regression analysis using 36 months of history in its design day methodology. This produces an estimate of the design day demand for firm gas service and supports the required pipeline capacity levels. Due to the different weather patterns in its service area, Great Plains performed individual regression analyses for Marshall, Crookston, and Fergus Falls, Minnesota. The calculations are consistent with the design day methodologies accepted by the

Commission in previous Dockets¹. Great Plains continues to monitor its data and regression models for the presence of autocorrelation and whether it has statistical significance to the projected design day requirement, as agreed to in Docket No. G004/M-17-521. While studies indicate autocorrelation is present, its effects are immaterial and Great Plains continues to support its current methodology, as previously approved, as the modeling produces reasonable results.

As shown on Exhibit A, Great Plains has calculated a projected design day requirement of 31,678 dk/day. This projection consists of 14,029 dk/day for firm customers receiving natural gas from city gates interconnecting with VGT and 17,649 dk/day for those firm customers receiving natural gas from city gates interconnecting with Northern Natural Gas (NNG).

Great Plains has a long history of successfully serving its customers' gas requirements in a safe, reliable, and economical fashion. The Company believes its regressions are accurate, can be relied upon for forecasting demand requirements, and the resulting design day peak capacity requirements are not unreasonable. Great Plains serves approximately 22,300 Minnesota customers and is intimately familiar with its customer's gas usage, conservation, and growth characteristics.

Capacity Portfolio

Current

Transmission capacity currently subscribed to and effective November 1, 2023, totals 53,145 dk/day. Within this value, 38,145 dk/day directly interconnects to Great Plains' city gates. The remaining 15,000 Dk/day has been contracted such that natural gas may be purchased from markets located on upstream transmission pipelines that do not interconnect with Great Plains' city gates. This is referred to as supplemental capacity.

Currently subscribed transmission capacity that directly interconnects with Great Plains' city gates includes 19,000 dk/day on VGT to serve the city gates of Crookston, MN and communities located on Great Plains' transmission lateral located between Vergas, MN and Wahpeton, ND. These contracts consist of 17,000 dk/day of annual capacity and 2,000 dk/day of seasonal (November-March) capacity.

The currently held VGT capacity has the option to be sourced by 15,000 dk/day of supplemental capacity on NNG's transmission system. The supplemental capacity on NNG consists of 13,000 dk/day of annual capacity and 2,000 dk/day of seasonal

¹ Docket No. G004/M-13-566: Order dated January 9, 2014, Docket No. G004/M-14-563: Order dated August 11, 2015, Docket No. G004/M-15-645: Order dated June 8, 2017, Docket No. G004/M-16-557: Order dated June 8, 2017; Docket No. G004/M-17-521: Order dated May 15, 2018, Docket No. G004/M-19-430: Order dated April 27, 2020, Docket No. G004/M-20-562: Order dated April 27, 2021, and Docket No. G004/M-21-522: Order dated July 12, 2023.

capacity. Specifically, natural gas is purchased from market locations on NNG's transmission system (typically NNG-Ventura), transported to a NNG/VGT interconnect (Chisago), and subsequently transported to Great Plains' city gates interconnecting with VGT.

To provide transmission service to Great Plains' communities interconnecting with NNG, Great Plains currently holds contracts for a maximum delivery quantity (MDQ) of 19,145 dk/day. Of this quantity, 10,535 dk/day is under annual subscription while 8,610 dk/day is under seasonal (November-March) subscription. This capacity directly connects three market locations to all Great Plains' city gates interconnecting with NNG's transmission system.

Proposed

Great Plains proposes to release 8,291 dk per day of VGT capacity for the 2024-2025 heating season. Great Plains intends to again release 4,291 dk per day of VGT capacity for the 2024-2025 heating season. Great Plains intends to release an additional 4,000 dk per day of VGT capacity due to the completion of the Wahpeton Expansion Project. This project results in Wahpeton customers no longer taking service through Great Plains' system as of November 1, 2024. Great Plains also proposes to amend the TF5 (Nov-Mar), a seasonal contract, to the annual TF12 Base and TF12 Variable contracts on NNG. Great Plains does not intend to release any capacity on NNG recognizing that load has grown such that the reserve margin is at an acceptable level of 8.5 percent. The Company will update the Commission regarding the final capacity released by November 1, 2024.

The arrangement of supplying VGT city gates from NNG market locations provides a robust and reliable source of natural gas for Great Plains' customers. The proposed portfolio equitably and evenly distributes capacity such that city gates interconnecting with either available transmission company have appropriate levels of transmission capacity.

As shown on Exhibit A, these actions will yield a consolidated reserve margin of 7.8 percent for Great Plains' customers. During the 2023-2024 heating season natural gas prices have stabilized to become consistent with historical norms. Great Plains continues to see interest for natural gas throughout its service territory and anticipates additional growth of this clean burning fuel. Great Plains will continue to monitor customer growth and related changes in demand, as well as any effects of conservation.

Exhibit B, page 2, shows the consolidated demand profile history for the 2022-2023, 2023-2024, and the proposed 2024-2025 heating seasons.

Capacity Releases

In the instant docket, Great Plains proposes to release excess capacity for the upcoming 2024-2025 heating season of 8,291 dk/day on VGT. This release is shown in Exhibit B. For the 2023-2024 heating season, Great Plains was successful in releasing 4,291 dk/day on VGT.

In 2022 Great Plains contracted for an additional capacity of 3,291 dk per day on VGT to provide firm service to an incremental large volume customer load for the 2022-2023 heating season in Docket No. G004/M-22-310. Customer 1 and 3 took service in Summer of 2022. Customer 2 relocated to another state in 2022. Customer 4 will not be taking service Fall of 2024 and at this time it is uncertain if the customer will be taking service in 2025. Therefore, Great Plains is proposing to release the full contracted capacity of 3,291 dk per day on VGT for the 2024-2025 heating season.

At this time, Great Plains has not encountered impediments to efforts being made to release the excess capacity on VGT. Great Plains will fully explain any impediments it may encounter in the supplemental demand entitlement filing.

Rate Impacts

Table 1: Proposed Demand Costs

Interstate Pipelines				
	Dk/Day	Rates	Months	Demand Cost
<u>Viking Firm</u>				
FT-A - Zone 1-1 (Cat. 3)	8,000	\$5.6200	12	\$539,520
FT-A - Zone 1-1 (Cat. 3)	5,000	5.6200	12	337,200
FT-A - Seasonal (Cat. 3)	2,000	5.6200	5	56,200
FT-A - Zone 1-1 (Cat. 3)	5,000	5.6200	12	337,200
FT-A - Zone 1-1 (Cat. 3)	3,291	5.6200	12	221,945
FT-A - Capacity Release	(8,291)	5.6200	5	(232,977)
<u>Northern Natural Firm</u>				
TFX - Summer	13,000	\$9.6760	7	\$880,516
TFX - Winter	13,000	25.7990	5	1,676,935
TFX Seasonal (November - March)	2,000	25.7990	5	257,990
TF12 Base - Summer	5,129	9.6760	7	347,397
TF12 Base - Winter	5,129	17.4170	5	446,659
TF12 Variable - Summer	5,816	9.6760	7	393,929
TF12 Variable - Winter	5,816	23.6090	5	686,550
TFX - Winter	5,200	25.7990	5	670,774
TFX - Annual (Summer Rate)	3,000	9.6760	7	203,196
TFX - Annual (Winter Rate)	3,000	25.7990	5	386,985
FDD-1 Reservation	4,640	3.2345	12	180,097
Interruptible Demand Credit				(\$469,665)
Total Demand Charges				\$6,920,451

Pursuant to NNG’s FERC tariff, NNG adjusts the MDQ associated with the TF12 Base and TF12 Variable effective November 1 of each year, based on the amount of capacity used during the preceding May – September period. Currently, the adjustment is pending; however, the change is typically insignificant. The change in the TF12 Base and TF12 Variable will be available by November 1, 2024, and Great Plains will provide a report to the Commission regarding the amount of the TF12 Base and TF12 Variable in place for the 2024-2025 heating season at that time.

Great Plains currently has 38,145 dk per day in demand capacity, of which 3,700 dk per day is allocated to Wahpeton, North Dakota. The Company intends to serve Wahpeton, North Dakota customers via Montana-Dakota’s integrated gas system upon completion of the Wahpeton Expansion Project on November 1, 2024. Therefore, Great Plains is proposing to release an additional 4,000 dk per day from its current Demand Entitlement Quantity. This change results in an increase in total demand charges as a result of several things:

1. The exclusion of Wahpeton, North Dakota customers from the firm normalized dk evaluation;
2. A lower Interruptible Demand Credit as a result of the Wahpeton, North Dakota customers exclusion from the interruptible normalized dk evaluation; and
3. The inclusion of capacity releases at the current tariff rate when previous capacity releases has resulted in a favorable pricing scenario.

Exhibit C shows the impacts to customers due to the capacity changes discussed above. There is an increase of 20.4 percent in the demand component cost for residential and firm general customers based on the proposed capacity levels and current pricing from the rates in effect in July 2024.

The total customer impact of the updated demand profile compared to rates effective July 2024 is an increase of \$0.4277 per dk. The proposed demand cost of gas is increasing \$0.4277 per dk due to the removal of Wahpeton volumes but offset by the updated capacity release define above. Please see Table 2 below for the annual rate impacts reflecting the capacity and prices noted in Table 1 above.

Table 2: Proposed Demand Cost Impacts

Filing Date	Residential Customer (81.2 Dk)	Total Change Residential (%)	Firm General Customer (436.0 Dk)	Total Change Firm General (%)
July 1, 2024	\$34.73	6.1	\$186.48	6.5

Demand Entitlement Analysis

Exhibit D reflects the upcoming 2024-2025 heating season for the design day requirement, total entitlement and peak day design, and entitlement and firm send out per customer.

WBI Energy Transmission Pipeline Project-Update

On May 27, 2022, WBI Energy filed an application with FERC in Docket No. CP22-466 on the Wahpeton Expansion Project that will extend service to Wahpeton, North Dakota, and nearby communities.

On October 19, 2023 the Federal Energy Regulatory Commission (FERC) approved the WBI Energy Transmission Pipeline Project.

Currently, Great Plains expects the pipeline to be in service on November 1, 2024 and will result in Wahpeton customers being served by Montana-Dakota's integrated gas system. The existing Great Plains' system, including storage, will then be solely serving Minnesota customers. This results in an additional capacity release of 4,000 dk per day of VGT capacity of the proposed 8,291 dk per day of VGT capacity to be released for the 2024-2025 heating season. The additional capacity release is reasonable based on Wahpeton's capacity of 3,700 dk per day of VGT capacity for the 2023-2024 heating season.

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

Sincerely,

/s/ Travis R. Jacobson

Travis R. Jacobson
Director of Regulatory Affairs

cc: Kristin Stastny

**GREAT PLAINS NATURAL GAS CO.
DEMAND ENTITLEMENT FILING
DESIGN DAY - HEATING SEASON
EFFECTIVE NOVEMBER 1, 2024**

<u>Viking Firm</u>	<u>Customer Factors 1/</u>		<u>Design HDD 2/</u>	<u>Customers 3/</u>	<u>Projected Customers 4/</u>	<u>Peak/ Customer</u>	<u>Projected Peak Day (Dk)</u>	<u>L&UA 5/</u>	<u>Projected Design</u>	<u>Proposed Capacity</u>	<u>Reserve</u>
	<u>Dk/Day</u>	<u>Dk/DD</u>	<u>RSqr</u>								
Crookston	0.05056	0.01424	0.99592	2,645	2,647	1.41760	3,743	26	3,769		
North 4	0.05296	0.01440	0.99576	7,461	7,495	1.36336	10,189	71	10,260		
Total				10,106	10,142		13,932	97	14,029		
Northern Natural Firm	0.05089	0.01673	0.99602	12,195	12,188	1.43948	17,526	123	17,649		
Grand Total				22,301	22,330		31,458	220	31,678	34,145	7.8%

1/ Use per customer factors based on regression analysis for the 36 months ending March 2024.

2/ Design Heating Degree Days Base 60 degrees F.

3/ Reflects monthly average for December 2023 - February 2024.

4/ Customer growth is based on regression analysis for the 36 months ending March 2024 with composite growth rates of: Crookston = 0.07%, North = 0.46%, and South = -0.06%.

5/ Lost and Unaccounted for Gas percentage of 0.7%.

**GREAT PLAINS NATURAL GAS CO.
DEMAND ENTITLEMENT FILING
DEMAND PROFILE
EFFECTIVE NOVEMBER 1, 2024**

<u>Demand Profile (Dk)</u>	<u>Authorized Amount</u>	<u>Proposed Change</u>	<u>Proposed Amount</u>	<u>Contract Length</u>	<u>Expiration Date</u>
<u>Viking</u>					
FT-A - Zone 1-1 (Cat. 3)	8,000	0	8,000	5 years	10/31/2027
FT-A - Zone 1-1 (Cat. 3)	5,000	0	5,000	5 years	10/31/2027
FT-A - Seasonal (Cat. 3)	2,000	0	2,000	5 years	10/31/2027
FT-A - Zone 1-1 (Cat. 3)	5,000	0	5,000	5 years	10/31/2028
FT-A - Zone 1-1 (Cat. 3)	3,291	0	3,291	10 years	10/31/2032
FT-A - Capacity Release	(4,291)	(4,000)	(8,291)	5 months	3/31/2025
Total	<u>19,000</u>	<u>(4,000)</u>	<u>15,000</u>		
<u>Northern Natural</u>					
TF12 Base (Summer and Winter)	3,531	1,598	5,129	5 years	10/31/2029
TF12 Variable (Summer and Winter)	4,004	1,812	5,816	5 years	10/31/2029
TF5 (November - March)	3,410	(3,410)	0	5 years	10/31/2029
TFX Seasonal (November - March)	5,200	0	5,200	5 years	10/31/2026
TFX (Annual)	2,000	0	2,000	5 years	10/31/2026
TFX (Annual)	1,000	0	1,000	2.5 years	3/31/2025
Total	<u>19,145</u>	<u>0</u>	<u>19,145</u>		
Demand Profile Total	<u>38,145</u>	<u>(4,000)</u>	<u>34,145</u>		
<u>Supplemental Capacity</u>					
TFX Seasonal (November - March)	2,000	0	2,000	5 years	10/31/2026
TFX (Annual)	13,000	0	13,000	5 years	3/31/2029
Total	<u>15,000</u>	<u>0</u>	<u>15,000</u>		
Total Transmission Capacity	<u>53,145</u>	<u>(4,000)</u>	<u>49,145</u>		
<u>Storage</u>					
FDD-1 Reservation	4,640	0	4,640	4 years	5/31/2028
Heating Season Total Capacity:	38,145	(4,000)	34,145		
Non-Heating Season Total Capacity:	31,826	3,410	35,236		
Forecasted Heating Season Design Day:	34,975	(3,297)	31,678		
Estimated Non-Heating Season Design Day:	19,194	(1,793)	17,401		
Heating Season Capacity: Surplus/(Shortage)	3,170	(703)	2,467		
Non-Heating Season Capacity: Surplus/(Shortage)	12,632	5,203	17,835		

**GREAT PLAINS NATURAL GAS CO.
DEMAND ENTITLEMENT FILING
3 YEAR DEMAND PROFILE**

2022-2023 Heating Season G004/M-22-310	Quantity (Dk)	2023-2024 Heating Season G004/M-23-262	Quantity (Dk)	2024-2025 Heating Season G004/M-24-	Quantity (Dk)	Difference
FT-A (Cat. 3) (12 months)	8,000	FT-A (Cat. 3) (12 months)	8,000	FT-A (Cat. 3) (12 months)	8,000	0
FT-A (Cat. 3) (12 months)	10,000	FT-A (Cat. 3) (12 months)	10,000	FT-A (Cat. 3) (12 months)	10,000	0
FT-A (Cat. 3) (November - March)	2,000	FT-A (Cat. 3) (November - March)	2,000	FT-A (Cat. 3) (November - March)	2,000	0
FT-A (Cat. 3) (12 months)	3,291	FT-A (Cat. 3) (12 months)	3,291	FT-A (Cat. 3) (12 months)	3,291	0
FT-A Capacity Release	(4,291)	FT-A Capacity Release	(4,291)	FT-A Capacity Release	(8,291)	(4,000)
TFX (12 months) 1/	13,000	TFX (12 months) 1/	13,000	TFX (12 months) 1/	13,000	0
TFX (November - March) 1/	2,000	TFX (November - March) 1/	2,000	TFX (November - March) 1/	2,000	0
TF12 Base	4,128	TF12 Base	3,531	TF12 Base	5,129	1,598
TF12 Variable	3,407	TF12 Variable	4,004	TF12 Variable	5,816	1,812
TF5 (November- March)	3,410	TF5 (November- March)	3,410	TF5 (November- March)	0	(3,410)
TFX (November - March)	5,200	TFX (November - March)	5,200	TFX (November - March)	5,200	0
TFX (Annual)	2,000	TFX (Annual)	2,000	TFX (Annual)	2,000	0
TFX (Annual)	1,000	TFX (Annual)	1,000	TFX (Annual)	1,000	0
FDD-1 Reservation 1/	4,640	FDD-1 Reservation 1/	4,640	FDD-1 Reservation 1/	4,640	0
Heating Season Total Capacity	38,145	Heating Season Total Capacity	38,145	Heating Season Total Capacity	34,145	(4,000)
Non-Heating Season Total Capacity	31,826	Non-Heating Season Total Capacity	31,826	Non-Heating Season Total Capacity	35,236	3,410
Total Entitlement	38,145	Total Entitlement	38,145	Total Entitlement	34,145	(4,000)
Total Annual Transportation	31,826	Total Annual Transportation	31,826	Total Annual Transportation	35,236	3,410
Total Season Transportation	6,319	Total Season Transportation	6,319	Total Season Transportation	(1,091)	(7,410)
Percent TF-5	31.16%	Percent TF-5	31.16%	Percent TF-5	0.00%	-31.16%
Total Percent Seasonal	16.57%	Total Percent Seasonal	16.57%	Total Percent Seasonal	-3.20%	-19.77%

1/ Does not impact demand profile.

**GREAT PLAINS NATURAL GAS CO.
DEMAND ENTITLEMENT FILING
RATE EFFECT OF PROPOSED DEMAND - NOVEMBER 1, 2024**

Exhibit C
Page 1 of 1

	Last Rate Case 1/	Last Demand Change 2/	Current Rates 3/	Proposed 4/	% Change from		Change from	
					Last Rate Case	Last Demand Change	Current Rates	Current Rates
<u>Residential Gas Service</u>								
Commodity Cost of Gas	\$2.23370	\$3.24790	\$2.16170	\$2.16170	-3.2%	-33.4%	0.0%	\$0.00000
GCR 5/	(0.06280)	0.04290	0.04290	0.04290	-168.3%	0.0%	0.0%	0.00000
Demand Cost of Gas	1.45680	1.82250	2.09450	2.52220	73.1%	38.4%	20.4%	0.42770
Commodity Margin 1/	3.01710	3.01710	3.01710	3.01710	0.0%	0.0%	0.0%	0.00000
CCRA 6/	(0.05970)	(0.00960)	(0.00960)	(0.00960)	-83.9%	0.0%	0.0%	0.00000
GAP 7/	0.02295	0.03399	0.03399	0.03399	48.1%	0.0%	0.0%	0.00000
GUIC 8/	0.30410	0.21460	0.21460	0.21460	-29.4%	0.0%	0.0%	0.00000
RDM and MSC 9/	(0.31120)	(0.30100)	(0.49220)	(0.49220)	58.2%	63.5%	0.0%	0.00000
Gas Event Surcharge 10/	0.00000	0.91670	0.00000	0.00000	N/A	-100.0%	N/A	0.00000
Total Rate	\$6.60095	\$8.98509	\$7.06299	\$7.49069	13.5%	-16.6%	6.1%	\$0.42770
Average Annual Usage (Dk)	81.2	81.2	81.2	81.2				
Average Annual Cost of Gas	\$536.00	\$729.59	\$573.51	\$608.24	13.5%	-16.6%	6.1%	\$34.73
<u>Firm General Service</u>								
Commodity Cost of Gas	\$2.23370	\$3.24790	\$2.16170	\$2.16170	-3.2%	-33.4%	0.0%	\$0.00000
GCR 5/	(0.06280)	0.04290	0.04290	0.04290	-168.3%	0.0%	0.0%	0.00000
Demand Cost of Gas	1.45680	1.82250	2.09450	2.52220	73.1%	38.4%	20.4%	0.42770
Commodity Margin 1/	2.46850	2.46850	2.46850	2.46850	0.0%	0.0%	0.0%	0.00000
CCRA 6/	(0.05970)	(0.00960)	(0.00960)	(0.00960)	-83.9%	0.0%	0.0%	0.00000
GAP 7/	0.02295	0.03399	0.03399	0.03399	48.1%	0.0%	0.0%	0.00000
GUIC 8/	0.18030	0.18160	0.18160	0.18160	0.7%	0.0%	0.0%	0.00000
RDM and MSC 9/	(0.19810)	(0.23490)	(0.35340)	(0.35340)	78.4%	50.4%	0.0%	0.00000
Gas Event Surcharge 10/	0.00000	0.91670	0.00000	0.00000	N/A	-100.0%	N/A	0.00000
Total Rate	\$6.04165	\$8.46959	\$6.62019	\$7.04789	16.7%	-16.8%	6.5%	\$0.42770
Average Annual Usage (Dk)	436.0	436.0	436.0	436.0				
Average Annual Cost of Gas	\$2,634.16	\$3,692.74	\$2,886.40	\$3,072.88	16.7%	-16.8%	6.5%	\$186.48
<u>Customer Class</u>	Commodity Change		Demand Change		Total Change		Avg. Annual	
	(\$/Dk)	(Percent)	(\$/Dk)	(Percent)	(\$/Dk)	(Percent)	Bill Change	
Residential Gas Service	\$0.0000	0.0%	\$0.4277	20.4%	\$0.4277	6.1%	\$34.73	
Firm General Service	0.0000	0.0%	0.4277	20.4%	0.4277	6.5%	186.48	

- 1/ Effective with service rendered on and after April 1, 2021 in Docket No. G004/GR-19-511.
2/ Demand in Docket No. G004/M-23-262, effective November 1, 2023.
3/ Most recently filed PGA: July 2024.
4/ Includes seasonal capacity release of 8,291 Dk and Minnesota normalized volumes.
5/ Effective with service rendered on and after September 1, 2023 in Docket No. G004/AA-23-381.
6/ Effective with service rendered on and after October 1, 2023 in Docket No. G004/M-23-186.
7/ Effective with service rendered on and after October 1, 2023 in Docket No. G004/M-23-83.
8/ Effective with service rendered on and after October 1, 2023 in Docket No. G004/M-23-161.
9/ Effective with service rendered on and after July 1, 2024, the Revenue Decoupling Mechanism rates only include the MSC component and is now identified on customers' bills as Margin Sharing Credit. - Docket No. G004/M-24-199.
10/ Effective with service rendered on and after September 1, 2021 for 27 months in Docket Nos. G999/CI-21-135 and G004/M-21-235.

	Firm Gas Sales Service (Rates 60 and 70)	Interruptible Gas Sales Service (Rates 71, 73, and 85)
September 1, 2021	\$1.57860 per dk	\$0.58250 per dk
November 1, 2021	\$0.63142 per dk	\$0.23298 per dk
April 1, 2022	\$1.57860 per dk	\$0.58250 per dk
November 1, 2022	\$0.63142 per dk	\$0.23298 per dk
December 1, 2022	\$1.26280 per dk	\$0.46600 per dk
March 1, 2023	\$0.91670 per dk	\$0.62700 per dk
April 1, 2023	\$2.29175 per dk	\$1.56750 per dk
November 1, 2023	\$0.91670 per dk	\$0.62700 per dk
December 1, 2023	\$0.00000 per dk	\$0.00000 per dk

**GREAT PLAINS NATURAL GAS CO.
DEMAND ENTITLEMENT FILING
DEMAND ENTITLEMENT ANALYSIS**

Heating Season	Number of Firm Customers			Design Day Requirement			Total Entitlement + Storage + Peak Shaving			
	(1) Number of Customers	(2) Change From Previous Year	(3) % Change From Previous Year	(4) Design Day (Dk)	(5) Change From Previous Year	(6) % Change From Previous Year	(7) Total Entitlement (Dk)	(8) Change From Previous Year	(9) % Change From Previous Year	(10) % of Reserve Margin [(7)-(4)]/(4)
2024-2025 a/	22,330	(2,375)	-9.61%	31,678	(3,297)	-9.43%	34,145	(4,000)	-10.49%	7.79%
2023-2024	24,705	(85)	-0.34%	34,975	(184)	-0.52%	38,145	0	0.00%	9.06%
2022-2023	24,790	72	0.29%	35,159	761	2.21%	38,145	(1,000)	-2.55%	8.49%
2021-2022	24,718	293	1.20%	34,398	476	1.40%	39,145	2,000	5.38%	13.80%
2020-2021	24,425	109	0.45%	33,922	(144)	-0.42%	37,145	200	0.54%	9.50%
2019-2020	24,316	76	0.31%	34,066	392	1.16%	36,945	1,400	3.94%	8.45%
2018-2019	24,240	243	1.01%	33,674	941	2.87%	35,545	1,100	3.19%	5.56%
2017-2018	23,997	184	0.77%	32,733	335	1.03%	34,445	200	0.58%	5.23%
Annual Average			-0.74%			-0.21%			0.07%	8.49%

Heating Season	Firm Peak Day Sendout			(14) Excess Per Customer [(7)-(4)]/(1)	(15) Design Day per Customer (4)/(1)	(16) Entitlement per Customer (7)/(1)	(17) Peak Day Sendout per Customer (11)/(1)
	(11) Firm Peak Day Sendout (Dk)	(12) Change From Previous Year	(13) % Change From Previous Year				
2024-2025 a/							
2023-2024	30,083	(603)	-1.97%	0.1105	1.4186	1.5291	
2022-2023	30,686	808	2.70%	0.1283	1.4157	1.5440	1.2177
2021-2022	29,878	(1,367)	-4.38%	0.1205	1.4183	1.5387	1.2378
2020-2021	31,245	2,794	9.82%	0.1920	1.3916	1.5837	1.2088
2019-2020	28,451	(1,869)	-6.16%	0.1320	1.3888	1.5208	1.2792
2018-2019	30,320	1,679	5.86%	0.1184	1.4010	1.5194	1.1701
2017-2018	28,641	112	0.39%	0.0772	1.3892	1.4664	1.2508
Annual Average			0.89%	0.0713	1.3640	1.4354	1.1935
				0.1188	1.3984	1.5172	1.2226

a/ Excludes Wahpeton, North Dakota customers.

**GREAT PLAINS NATURAL GAS CO.
DEMAND ENTITLEMENT FILING
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ONLY MINNESOTA**

Heating Season	Number of Firm Customers			Design Day Requirement			Total Entitlement + Storage + Peak Shaving			
	(1) Number of Customers	(2) Change From Previous Year	(3) % Change From Previous Year	(4) Design Day (Dk)	(5) Change From Previous Year	(6) % Change From Previous Year	(7) Total Entitlement (Dk)	(8) Change From Previous Year	(9) % Change From Previous Year	(10) % of Reserve Margin [(7)-(4)]/(4)
2024-2025	22,330	(9)	-0.04%	31,678	94	0.30%	34,145	(300)	-0.87%	7.79%
2023-2024	22,339			31,584			34,445			9.06%
Firm Peak Day Sendout										
Heating Season	(11) Firm Peak Day Sendout (Dk)	(12) Change From Previous Year	(13) % Change From Previous Year	(14) Excess Per Customer [(7)-(4)]/(1)	(15) Design Day per Customer (4)/(1)	(16) Entitlement per Customer (7)/(1)	(17) Peak Day Sendout per Customer (11)/(1)			
2024-2025	27,031			0.1105	1.4186	1.5291	0.8264			
2023-2024				0.1281	1.4139	1.5419				