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December 31, 2012

Burl W. Haar Executive Secretary Minnesota Public Utilities Commission 121 7th Place East, Suite 350 St. Paul, Minnesota, 55101-2147

RE: Comments of Minnesota Department of Commerce, Division of Energy Resources Docket No. G004/D-12-565

Dear Dr. Haar:

Attached are the Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Great Plains Natural Gas' Five-Year Depreciation Study.

The petition was filed on June 1, 2012 by:

Rita A. Mulkern Regulatory Affairs Manager Great Plains Natural Gas Company 705 West First Avenue P.O. Box 176 Fergus Falls, MN 56538-0176

The Department requests that Great Plains Natural Gas Co. provide additional information in reply comments and will make a recommendation to the Minnesota Public Utilities Commission (Commission) after it reviews this information. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ CRAIG ADDONIZIO Financial Analyst

CA/jl Attachment

Summary of Great Plains Natural Gas' Current and Proposed Depreciation Parameters

No. of the part					Curren	r and r r	Current and Froposed Depreciation Farameters	reciation r a	ameters							
Michael Registration Cornel Proposed Difference Diff	Account		Lowa	Curve	Ave	age Service L	ife	Averag	e Remaining Li	fe fe		Gross Salvage			ost of Remova	
Standard Representation Standard Represe	No.	Account Name	Current	Proposed	1 +-1	Proposed	Difference	Current	Proposed I	Afference	Ситтепт	Proposed	Difference	Current	Proposed	Difference
Standard Element	Deprectable.	Accounts														
Decidication control	900	,	4 10	ç	30	o	v	1.5	1.50	(0000)	7000	2000 OF	10.00%	%00 O	%00.0	,
Particular Procession Particular Particu	303,00	The Temperature	5.15 7.01	20,	3 4	2 5	્ર	0.41	1.49	(199)	%000	10.00%	10.00%	-10.00%	%00.0	10.00%
Patient Chief	320.00	Orber Gas Production	8	1.5	25.	2 6	£ 4	2.49	1.32	61.13	%00'0	10.00%	10.00%	0.00%	%00.0	
Proposition Maternal State S	365.20	Rights of Wav	R2.5	R2.5	20	20	: '	22.54	21.90	(0.64)	0.00%	0.00%	,	0.00%	%00'0	
Action Right Size Figure Controls R2 2	367.00	Transmission Mains	22	2	20	20		16,91	12.70	(4.21)	%00.0	%00'0	,	-20,00%	-20.00%	•
Andread and Cathodis Protection R3 R5 22 23 24 348 (0.36) 0.00% 0.00% - 0.00%<	367.40-42	Railroad, River & Highway Crossings	12	Ź	04	40		22.09	21.45	(0.64)	0.00%	0.00%	•	-20.00%	-20.00%	
Victorial Protection Till Sign Sign Sign Sign Sign Sign Sign Sign	367.45	Anodes and Cathodic Protection	2	122	25	23		9.21	8.58	(0.63)	0.00%	%00'0	,	-20.00%	-20.00%	,
61 Time & Stall Figure 81 81 91 <td>367.50</td> <td>Valves</td> <td>ສ</td> <td>2</td> <td>40</td> <td>4</td> <td>,</td> <td>6,20</td> <td>5.84</td> <td>(0.36)</td> <td>0.00%</td> <td>0.00%</td> <td>ı</td> <td>-20.00%</td> <td>-20.00%</td> <td>•</td>	367.50	Valves	ສ	2	40	4	,	6,20	5.84	(0.36)	0.00%	0.00%	ı	-20.00%	-20.00%	•
Right of Ways Right of	367.6061	Farm & Side Taps	R4	R4	30	30	•	8.10	7.51	(0.59)	%00'0	%00.0		-20.00%	-20.00%	•
Righter of Name Righter of	369,00	Meas & Reg Station Equipment	.R2	RI	35	35	,	19.63	28.83	9.20	%00.0	0.00%		~2.00%	-5.00%	,
Distant Mass & Rag Station Structures S15 S15 S15 S15 S15 S15 S109 Action Mass & Rag Station Structures S10 S1	374.20	Rights of Way	R2.5	R2.5	50	20	ł	29.24	28.47	(0.77)	%00.0	%00.0		%00.0	0.00%	•
Steach Mainta R4 R5 54 (1) 27.98 31.02 30.04	375.00	Distr, Meas & Reg Station Structures	81.5	\$1.5	85	82		14.29	24.24	9,95	0.00%	0.00%		~2.00%	-5.00%	•
Postatic Ministry SS R4 50 45 145 51,45 50,054 50,054 - 50,054 - 50,054 - 50,054 - 50,054 - 50,054 - 50,054 - 55,004	376,00	Steel Mains	R4	22	55	54	E	27.98	31.02	3.04	%00'0	0,00%		-55.00%	-55.00%	į
Valuesis Merics PLAS PARTY LLS RLS	376.10	Plastic Mains	S6	R4	30	45	15	19,38	34.30	14.92	0.00%	0.00%		-55.00%	-55.00%	į
50 Velves R13 R2 47	376.11	Plastic Mains - PVC	Ľ	n/a	45	n/a	n/a	7.44	7.50	90.0	0.00%	0.00%		-55,00%	-55.00%	r
50 Audiotise Prevention R1 R1 40 40 - 21.76 7.10 6.05 0.00% - 5.55.00% Audode and Chordie Prevention R3 R3 2.5 - - 1.11 1.85 (0.57) 0.00% - 5.55.00% Pipellin Markers and Chordie Prevention R3 R3 2.0 - - 2.11 1.85 (0.57) 0.00% - 5.55.00% Mean & Page Station Equip-Cloreral R4 R4 2.0 2.0 - 2.15 0.00% 0.00% - 5.55.00% Stead Services Stead Services R4 2.0	376.20	Valves	R2.5	S	47	47	,	33,41	31.88	(1.53)	%00'0	%00.0		-55.00%	-55.00%	1
Anode and Cathodic Perspection R3 R3 2.5 - 7.56 7.39 6.75 0.00% 0.00% - 5.55 00% Molas & Page and Cathodic Perspection R3 R4 3.5 4.0 - 1.248 10.55 0.00% 0.00% - - 15.00% Molas & Page Station Equip-General R4 R4 3.5 4.0 - 1.248 10.56 (1.52) 0.00% 0.00% - <td< td=""><td>376,28-,50</td><td>Railroad, River & Highway Crossings</td><td>R</td><td>. RI</td><td>40</td><td>40</td><td></td><td>21.76</td><td>21.10</td><td>(0.66)</td><td>%00'0</td><td>%00.0</td><td></td><td>-55,00%</td><td>-55.00%</td><td>•</td></td<>	376,28-,50	Railroad, River & Highway Crossings	R	. RI	40	40		21.76	21.10	(0.66)	%00'0	%00.0		-55,00%	-55.00%	•
Pigatistic Activations R3 R3 20 2 11 11 15 0.00% 0.00% -5 5.50% Meas & Rag Station Equip-General R4 R4 84 30 4 5 134 10.50 0.00% -0.00% -5 5.50% Steed Station Equip-City Gete R4 R4 84 30 4 5 134 16.20 0.00% 0.00% -7.50% Steed Station Equip-City Gete R4 R4 R4 18 1.85 0.00 0.00% 0.00% -7.50% Plastic Services PVC R4 R4 1.8 1.8 1.55 0.00% 0.00% -7.50% Plastic Services PVC R4 1.8 1.0 1.6 1.55 0.00% 0.00% -7.50% Anodes an Cettodic Protection R4 1.0 1.0 1.0 1.5 1.7 0.00% -7.50% 1.50% Means an Cettodic Protection R5 1.0 1.0	376.55	Anodes and Cathodic Protection	83	2	25	25	,	7.96	7.39	(0.57)	%00'0	0.00%		-55.00%	-55.00%	,
Mease & Pag Station Equip-General RA 35 40 5 11248 10.956 (1.53) 0.00% - 1.5	376.56	Pipeline Markers	ß	ຊ	20	50	,	2.11	1.85	(0.26)	%00'0	%00.0		-55.00%	-55.00%	•
Name & Rag Station Equip-City Gate R4 R4 30 30 - 1314 1629 315 0.00% 0.00% - 2.00% 0.00% - 2.00% 0.00% - 2.00% 0.00% - 2.00% 0.00% - 2.00% 0.00% - 2.00% 0.00% - 2.00% 0.00% - 2.00% 0.00% - 2.00% 0.00% - 2.00% 0.00% 0.00% - 2.00% 0.00% 0.00% - 2.00% 0.00% 0.00% - 2.00% 0.00% 0.00% - 2.00% 0.00% - 2.00% 0.00% 0.00% - 2.00% 0.00% 0.00% - 2.00% 0.00% - 2.00% 0.00% 0.00% - 2.00% 0.00% 0.00% - 2.00% 0.00% 0.00% - 2.00% 0.00% 0.00% - 2.00% 0.00% - 2.00% 0.00%	378.00	Meas & Reg Station Equip-General	B	R4	35	40	ν,	12.48	10,96	(1.52)	0.00%	%00.0		-15.00%	-15.00%	,
State Services	379,00	Meas & Reg Station Equip-City Gate	R 4	R4	30	30	•	13,14	16.29	3.15	%00'0	0.00%		-2.00%	-2.00%	•
Pictai: Services-PVC	380.00	Steel Services	R2	22	43	38	છ	20.09	16.30	(3.79)	%00.0	%00.0	•	~75.00%	-75.00%	3
Piestic Services - PVC	380.10	Plastic Services	Z	RS	29	37	•	15.85	23,34	7.49	0.00%	%00.0	,	-75.00%	-75.00%	
Anodes and Cathodic Protection R3 R3 R3 R3 R3 R3 R3 R	380.11	Plastic Services - PVC	R4	n/a	30	n/a	п/а	1.55	7.50	5.95	0.00%	0.00%	,	-75.00%	-75.00%	
Meters R25 n/a 40 n/a n/a 1384 9.30 (1386) 0.00% 15.00%	380.55	Anodes and Cathodic Protection	83	22	25	25	,	3.05	2.74	(0.31)	%00.0	%00'0		-75.00%	-75.00%	
House Regulators S4	381.00	Meters	R2.5	n/a	40	11/3	n/a	23.15	9.30	(13.86)	0.00%	%00:0		-15.00%	-15.00%	
Industrial Meas, & Reg. Station Equipment	383.00	House Regulators	\$8	n/a	40	n/a	n/a	19.86	9.30	(10.57)	0.00%	%00'0	•	0.00%	%00'0	•
Cathodic Protection Equipment R3 R3 25 25 -	385.00	Industrial Meas. & Reg. Station Equipment	\$2	\$4	9	40	•	15.11	14,22	(0.89)	%00'0	%00'0	•	0,00%	0.00%	
Other Equipment R3 R3 30 30 - 847 787 (0.60) 0.00% - 0.00% Office Equipment S0.5 R3 70 45 (2.5) 16,58 36,60 19,62 0.00% - 0.00% Leasthold Improvements R4	387,10	Cathodic Protection Equipment	R3	2	52	25	•	15.15	14.29	(0.86)	%00.0	0.00%	,	%00.0	%00.0	
Communication Equipment SO.5 R.3 70 45 (25) 16.98 36.60 19.62 0.00% 0.00	387.20	Other Equipment	2	2	30	30		8.47	7.87	(09 0)	0.00%	%00'0	,	%00.0	0.00%	
Leasehold Improvements R4 R5 R2 R1 R2 R1 R2 R1 R2 R1 R2 R1 R2 R1 R2 R2<	390.0001	General Structures & Improvements	S0.5	ß	70	45	(25)	16.98	36,60	19.62	%00'0	%00'0	•	0.00%	0.00%	
Trailers Trailers R2 R1 13 12 (1) 5.01 6.21 1.20 0.00% 0.00% 0.00% 0.00% 0.00% Transportation Equipment R3 L2 8 7 (1) 4.21 3.91 (0.30) 20.00% 20.00% 0.00% 0.00% Zable Accounts Computer & Equipment Communication Equipment Communication Equipment Communication Equipment Communication Equipment Communication Equipment Communication Equipment Computer & Compu	390.02	Leasehold Improvements	R4	R4	10	10		0.97	0,73	(0.24)	0.00%	0.00%	s	0.00%	0.00%	
Transportation Equipment R3 L2 8 7 (1) 421 3.91 (0.30) 20.00% 20.00% - 0.00%	392.10	Trailers	23	R	13	12	Ξ	5.01	6.21	1.20	0.00%	%00.0		%00.0	0.00%	
Power Operated Equipment L1 L0 8 8 - 5.38 6.13 0.75 25.00% - 0.00% Zable Accounts Office Furniture & Equipment Computer & Equipment 16 16 1 - 0.00% 0.00% 0.00% Other Computer & Equipment 5 5 - 0.00% 0.00% - 0.00% Online Furniture & Equipment 20 20 20 - 0.00% 0.00% - 0.00% Online Furniture & Equipment 20 20 - - 0.00% - 0.00% - 0.00% Online Furniture & Equipment 20 20 - - 0.00% 0.00% - 0.00% Tools, Shop & Garage Equipment 18 18 - - 0.00% - 0.00% Miscellaneous Equipment 25 25 - 0.00% - 0.00% Annumication Equipment 25 25	392,20	Transportation Equipment	22	ដ	∞	7	Ξ	4.21	3.91	(0:30)	20.00%	20,00%		%00'0	0.00%	•
16 16 16 16 16 16 100% 0.00%	396.00	Power Operated Equipment	5	ន	œ	œ	,	5.38	6,13	0.75	25.00%	25.00%	•	0.00%	0.00%	1
Office Furniture & Equipment 16 16 - - 0.00% 0.00% - 0.00% Computer & Electronic Equipment 5 5 - 0.00% - 0.00% - 0.00% Other Computer Equipment 20 20 - 0 - 0.00% - 0.00% Tools, Shop & Garage Equipment 18 18 - 0 0.00% - 0.00% Miscellaneous Equipment 25 25 - 0.00% - 0.00%	Amortizable	Accounts				•										
Office Furniture & Equipment Office Furniture & Equipment Office Furniture & Equipment Office Furniture & Equipment Office Computer Equipment S 5 - 0.00% Office Computer Equipment S 5 - 0.00% Office Computer Equipment Office Furniture &					ì						0.0002	70000	,	7000	%00.0	
Computer & Electronic Equipment 4 4 4 4 5 5 6.00% 7.00% 6.00% 7.00% 6.00% 7.00% 6.00% 7.00% 6.00% 7.00% 6.00% 7.00% <	391,10	Office Furniture & Equipment			9 ,	۹ ۰					0.00%	0.00%	1 1	%000	%000	
Other Computer Equipment Tools, Shop & Garage Equipment Communication Equipment Miscellaneous Equipment 25 25 - 0.00%	391.30	Computer & Electronic Equipment			, ,	+ •					2000	0.000	ı	%000	%00.0	
Tools, Snop & Variage Equipment	391,50	Uther Computer Equipment			n 6	n 6					7,000	2000	•	%00.0	%000	
Communication Equipment	394.00	Tools, Shop & Garage Equipment			07 :	70					2000	78000		76000	0.00%	
Miscellaneous Equipment Cooks	397.00	Communication Equipment			2 18	e i					0.00%	2,00,0		0.00%	%00.0	,
	398.00	Miscellaneous Equipment			67	6.2					0,0070	. 0.00.0	ı	2/22:2	2000	

Source: Great Plains' 2011 and 2012 Depreciation Studies

Docket No. G004/D-12-565 Department Attachment 2 Page 1 of 3

State of Minnesota DEPARTMENT OF COMMERCE DIVISION OF ENERGY RESOURCES

Docket Num	aber: G004/D-12-565	Date of Request: October 23, 2012
Requested Fi	rom: Rita A. Mulkern	Response Due: November 2, 2012
Analyst Requ	uesting Information: Craig Addonizio	
Type of Inqu	iry: [X] Financial [] Rate [] Engineering [] Fore [] Cost of Service [] CIP	of Return [] Rate Design casting [] Conservation [] Other:
If you feel yo	our responses are trade secret or privileged, p	lease indicate this on your response.
Request No.		
8	Reference: Accounts 305 and 311 Gross	Salvage and Cost of Removal
	 consultants (AUS Consultants) discuss and 311 and refer to peak shaving proper be disconnected and removed by 2013 a. Is the referenced peak shaving propert discussed in Docket No. G004/M-11-shaving facility. b. Please identify the plant in service and the referenced peak shaving facility. c. Please explain Great Plains' reasons for explain how Great Plains' determined (10% and 0%, respectively, for both A Response: 	y the retired Marshall propane peaking facility, as .075? If not, please identify the referenced peak reserve balances as of 12/31/2011 associated with or expecting positive salvage from these facilities and the gross salvage and cost of removal percentages ecounts).
	a. The referenced plant is the Marshall p	ropane peaking facility, however there was also peaking facility remaining as of December 31, 2011
Response b	by: Rita A. Mulkern	List sources of information:
Tit	le: Director of Regulatory Affairs	
Departmen	nt: Regulatory Affairs	
Telephon	ne: (701)222-7854	

Docket No. G004/D-12-565 Department Attachment 2 Page 2 of 3

- and some small amounts related to other retired propane plants. Great Plains received approval in Docket No. G004/M-10-1164 to retire the Montevideo facility and authority in Docket No. G004/PA-11-1108 to sell the facility, but the retirement of the Montevideo facility was not complete by December 31, 2011.
- b. Please see Attachment A.
- c. The Company has no specific experience relative to gross salvage or cost of removal for Account 305-Structures and Improvements. Relative to Account 311-Liquified Propane Equipment the Company historically has achieved a modest 2.3 % gross salvage and approximately 1% cost of removal related to interim retirements of this property class. Given that the property is now at the end of its useful service life it is anticipated that there will be even less opportunity to achieve potential gross salvage, hence the 0 percent gross salvage. Conversely, the removal of the properties will result in the Company expending a modest amount of funds to physical demolish the facilities and restore the sites. It may be that the Company will expend greater amounts to complete such tasks. At the present time there specific bids or project cost estimates.

Response by:	Rita A. Mulkern	List sources of information:
Title:	Director of Regulatory Affairs	
Department:	Regulatory Affairs	
Telephone:	(701)222-7854	

GREAT PLAINS NATURAL GAS CO. PROPANE PLANT DECEMBER 31, 2012

	Total	Marshall	Montevideo	Redwood Falls	Other 1/
Plant in service					
305	\$282,998	\$204,699	\$78,298	\$0	\$0
311	415,125	268,230	146,896	0	0
320	4,970	3,413	1,557	0	0
Total	\$703,093	\$476,342	\$226,751	\$0	\$0
Accumulatd reserve]		·			
305	(\$227,227)	(\$177,421)	(\$58,716)	\$9,650	(\$740)
311	(408,148)	(269,279)	(147,969)	(4,319)	13,419
320	(4,960)	(3,415)	(1,558)	0	13_
Total	(\$640,335)	(\$450,115)	(\$208,243)	\$5,331	\$12,692
Net Plant					
305	\$55,771	\$27,278	\$19,582	\$9,650	(\$740)
311	6,977	(1,049)	(1,073)	(4,319)	13,419
320	10	(2)	(1)	0	13
Total	\$62,758	\$26,227	\$18,508	\$5,331	\$12,692

^{1/} Reserve remaining on other retired propane plants.

Docket No. G004/D-12-565 Department Attachment 3 Page 1 of 2

State of Minnesota DEPARTMENT OF COMMERCE DIVISION OF ENERGY RESOURCES

Docket Nu	mber: G004/D-12-565	Date of Request: October 23, 2012
Requested	From: Rita A. Mulkern	Response Due: November 2, 2012
Analyst Re	questing Information: Craig Addo	nizio
Type of Inc	[]Engineering []Cost of Service	
Request No.		
	Company's expectation that the program for PVC pipe. a. Please provide a detailed replacement schedule, est is already underway. b. Please explain why Great program and set an average effect. Response: a-b As of December 31, 2011 service. During 2012 the Mains. Based upon the or property would be replaced referenced in the deprecial years period results in an not a specific requirement.	aining life of 7.5 years for Account 376.11 based on the Minnesota Office of Pipeline Safety may require a replacement description of Great Plains' replacement program including a imated costs, etc., and explain whether the replacement program Plains' feels that it is appropriate to implement a replacement ge remaining life based on safety regulations that are not yet in Company will have replaced approximately 10.4 miles of PVC ngoing replacement level (147.6/10.4), the current PVC Mains and within 14 plus years, well within the estimated 15 years attion study report. The total replacement of the property over a 15 average remaining replacement period of 7.5 years. While there is to replace PVC due to pipeline safety standards it is uncertain periods. The issues for the Company are that the property class
Response	e by: Rita A. Mulkern	List sources of information:
Ţ	itle: <u>Director of Regulatory Affairs</u>	
Departn	nent: Regulatory Affairs	
Teleph	one: (701)222-7854	

Docket No. G004/D-12-565 Department Attachment 3 Page 2 of 2

includes no locating wire, thus it is an operations issue as it takes more time to locate the pipe, and it is very difficult getting replacement parts such as stopping equipment and taps.

Response by:	Rita A. Mulkern	List sources of information:
Title:	Director of Regulatory Affairs	
Department:	Regulatory Affairs	
Telephone:	(701)222-7854	

Docket No. G004/D-12-565 Department Attachment 4 Page 1 of 2

State of Minnesota DEPARTMENT OF COMMERCE DIVISION OF ENERGY RESOURCES

Docket Nu	mber: G004/D-12-565 Date of Request: October 23, 2012
Requested	From: Rita A. Mulkern Response Due: November 2, 2012
Analyst Re	questing Information: Craig Addonizio
Type of Inc	quiry: [X] Financial [] Rate of Return [] Rate Design [] Engineering [] Forecasting [] Conservation [] Cost of Service [] CIP [] Other:
If you feel	your responses are trade secret or privileged, please indicate this on your response.
Request No.	
13	Reference: Account 380.11 Replacement Program
	Great Plains is proposing a remaining life of 7.5 years for Account 380.11 based on the Company's expectation that the Minnesota Office of Pipeline Safety may require a replacement program for PVC pipe.
	a. Please provide a detailed description of Great Plains' replacement program including a replacement schedule, estimated costs, etc., and explain whether the replacement program is already underway.
	b. Please explain why Great Plains feels that it is appropriate to implement a replacement program and set an average remaining life based on safety regulations that are not yet in effect.
	Response: a-b. As of December 31, 2011 the Company had 8,318 PVC Services in service. During 2012 the Company will have replaced approximately 475 and anticipate replacing 550 PVC services in the foreseeable future. Replacing 550 services per year on an ongoing basis (8,318/550) would result in the current PVC Services property being replaced within approximately 15 years—the estimated 15 years referenced in the depreciation study report. The total replacement of the property over a 15 years period results in an average remaining replacement period of 7.5 years. While there is not a specific requirement to replace PVC
Response	e by: Rita A. Mulkern List sources of information:
Ţ	Title: Director of Regulatory Affairs
Departn	nent: Regulatory Affairs
Teleph	one: (701)222-7854

Docket No. G004/D-12-565 Department Attachment 4 Page 2 of 2

due to pipeline safety standards it is uncertain what will occur in future period. The issue for the Company is the fact that the property class includes no locating wire, thus it is an operations issue as it takes more time to locate the pipe and and it is very difficult getting replacement parts such as stopping equipment and taps.

Response by:	Rita A. Mulkern	List sources of information:
Title:	Director of Regulatory Affairs	
Department:	Regulatory Affairs	
Telephone:	(701)222-7854	

Docket No. G004/D-12-565 Department Attachment 5 Page 1 of 1

State of Minnesota DEPARTMENT OF COMMERCE DIVISION OF ENERGY RESOURCES

Docket Number	: G004/D-12-565	Date of Request: Octobe	r 23, 2012
Requested From	n: Rita A. Mulkern	Response Due: Novem	ber 2, 2012
Analyst Reques	ting Information: Craig Addonizi	o ·	
Type of Inquiry	[]Engineering [Rate of Return Rate Design Conservation Other:	ı
If you feel your	responses are trade secret or priv	ileged, please indicate this on your respon	se.
Request No.			
18 I	Reference: Account 390.00 Struc	tures and Improvements	
H H T t	Please explain the basis for the properties. The Company had a variety of busineratory that were no longer needed the Company has now consolidated limited number of facilities remain accordingly, at the end of the currence meaningful value associated with the	tts from Account 390 have averaged 55% goosed 0% gross salvage rate. ness/office/service structures located through and Great Plains was successful in selling d and/or eliminated all such facilities. The ming that it will need to continue to utilize intly properties' useful life there will be little disposal of these structures. Furthermore pany will continue to use the site through the structure of the site structure o	ghout its service these buildings. Company has only for service. e, if any, e, there is a
Response by:	Rita A. Mulkern	List sources of information:	
Title:	Director of Regulatory Affairs		
Department:	Regulatory Affairs		
Telephone:	(701)222-7854		

Docket No. G004/D-12-565 Department Attachment 6 Page 1 of 1

State of Minnesota DEPARTMENT OF COMMERCE DIVISION OF ENERGY RESOURCES

Docket Number	:: G004/D-12-565 Date of Request: October 23, 2012
Requested From	n: Rita A. Mulkern Response Due: November 2, 2012
Analyst Reques	ting Information: Craig Addonizio
Type of Inquiry	[X] Financial [] Rate of Return [] Rate Design [] Engineering [] Forecasting [] Conservation [] Other:
If you feel your	responses are trade secret or privileged, please indicate this on your response.
Request No.	
3 1	Reference: Table 5-391.3
	Table 5-391.3 shows that vintage 2008 property has a Remaining Amount to be Amortized of \$7,098.36 and a Remaining Amortization Period of 0.44 years. An Annual Amortization Amount of \$16,062.84 is then calculated by dividing the Remaining Amount to be Amortized by the Remaining Amount to Period: \$7,098.36 / 0.44 years = \$16,062.84 Please confirm that the Annual Amortization Amount should be capped at the Remaining Amount to be Amortized and therefore should be \$7,089.36, not \$16,062.84. Response: The amortization will only be recorded for the applicable remaining amortization portion of the year.
Response by:	Rita A. Mulkern List sources of information:
Title:	Director of Regulatory Affairs
Department:	Regulatory Affairs
Telephone:	(701)222-7854

CERTIFICATE OF SERVICE

I, Linda Chavez, hereby certify that I have this day served copies of the following document on the attached list of persons by electronic filing, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

MINNESOTA DEPARTMENT OF COMMERCE- COMMENTS

Docket No.	G004/D-12-565
Dated this 31	th day of December, 2012
/s/Linda Chav	/ez

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@ag.state.m n.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_12-565_D-12-565
Sharon	Ferguson	sharon.ferguson@state.mn .us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_12-565_D-12-565
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_12-565_D-12-565
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_12-565_D-12-565
Rita	Mulkern	rita.mulkern@mdu.com	Great Plains Natural Gas	400 N. 4th Street Bismarck, ND 58501	Paper Service	No	OFF_SL_12-565_D-12-565