

705 West Fir Ave.

Mailing Address:  
P.O. Box 176  
Fergus Falls, MN 56538-0176  
1-877-267-4764

June 14, 2021

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-21-217  
Reply Comments to the Comments of the Minnesota Department of Commerce,  
Division of Energy Resources

Dear Mr. Seuffert:

Great Plains Natural Gas Co. (Great Plains), a Division of Montana-Dakota Utilities Co., herewith electronically files its Reply Comments to the Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) filed on June 4, 2021.

In its comments the Department recommends that the Commission accept the 2020 Gas Affordability Plan (GAP) report submitted by Great Plains. The Department also recommends discontinuing the following reporting requirements of the Commission's May 12, 2008 *Order* in Docket No. G004/M-07-1235:

- Point 2, which stipulates that Great Plains provide in its annual GAP reports "...an evaluation of the assumed GAP participation rate of five percent in light of actual participation in the Program."
- Point 3, which stipulates that Great Plains provide in its annual GAP reports "...the actual annual average cost per participant for the Program, and...a discussion concerning any deviation of the actual annual average cost per participant compared to the assumed average annual cost per participant of \$555."
- Point 4, "...the Company's conclusion regarding the reported evaluation data, together with the Company proposal concerning the GAP on a going forward basis."

Point 4 of the Commission's May 22, 2017 Order Approving Periodic Gas Affordability Program Evaluations and Requiring Further Action in Docket No. G004/M-16-495 (Company's 2016 GAP Report) required Great Plains to revise its GAP reporting to

reflect GAP performance based on one-hundred percent of customers enrolled in both LIHEAP and GAP and one-hundred percent of customers only enrolled in LIHEAP, replacing the Company's previous approach to GAP reporting metrics. The Company also participated in the stakeholder workgroup, as ordered in Point 6 of the May 22, 2017 Order, that ultimately resulted in a Commission-approved streamlined annual GAP reporting form developed by the Department. This is the same reporting form under which Great Plains continues to report, as it has in prior years since approval of the streamlined report, the annual reporting requirements applicable to all utilities with a GAP.

Great Plains agrees with the Department's comments and recommendations and requests that the Commission issue an Order accepting Great Plains 2020 GAP report.

If you have any questions regarding this filing, please contact Travis R. Jacobson at (701) 222-7855, or Brian Meloy, at (612) 335-1451.

Sincerely,

*/s/ Travis R. Jacobson*

Travis R. Jacobson  
Director of Regulatory Affairs