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April 15, 2019

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

**Re: Gas Utility Infrastructure Cost Adjustment Tariff
True-up Report for 2018, 2019 Revenue Requirement and Revised
Adjustment Factors
Docket No. G004/M-19-____.**

Dear Mr. Wolf:

Great Plains Natural Gas Co. (Great Plains), a Division of Montana-Dakota Utilities Co., herewith electronically submits its Annual Report and Petition for approval of recovery of updated Gas Utility Infrastructure Costs (GUIC) under its GUIC Adjustment Tariff for 2019. The annual report presents the projected 2019 revenue requirement to be recovered through the GUIC, including a true-up of the prior year's revenue requirement with actual costs and recoveries for the period ending December 31, 2018, actual recoveries for January – March 2019 and projected recoveries through September 2019.

GUIC Costs and Recoveries

2017 Revenue Requirement	\$395,916
2018 Revenue Requirement	780,496
Less: Actual Recoveries (Nov 2017 – Dec 2018)	<u>571,363</u>
Under/(Over) Recovery – Dec 2018	\$605,049
Less: Recoveries (Jan 2019 – Sept 2019)	<u>404,444</u>
Subtotal – GUIC Under Recovery	\$200,605
2019 Projected Revenue Requirement	<u>1,071,716</u>
Total Required Recovery - Oct 2019 to Sep 2020	<u><u>\$1,272,321</u></u>

The Company proposes the following rates to be effective October 1, 2019.

	<u>Proposed Rate</u>	<u>Current Rate</u>	<u>Change</u>
<u>Sales:</u>			
Residential	\$0.4221	\$0.2494	\$0.1727
Firm General	\$0.3104	\$0.1792	\$0.1312
Small Interruptible	\$0.2063	\$0.1519	\$0.0544
Large Interruptible	\$0.1683	\$0.1103	\$0.0580
 <u>Transportation:</u>			
Small Interruptible	\$0.0731	\$0.0791	(\$0.0060)
Large Interruptible	\$0.0601	\$0.0105	\$0.0496

Great Plains respectfully requests this filing be accepted as being in full compliance with the filing requirements of this Commission and that the Commission approve the Annual Report and Petition as consistent with the public interest.

If you have any questions regarding this filing, please contact me at (701) 222-7856 or Brian Meloy, at (612) 335-1451.

Sincerely,

/s/ Tamie A. Aberle

Tamie Aberle
Director of Regulatory Affairs

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STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Dan Lipschultz	Commissioner – Vice Chair
Matthew Schuerger	Commissioner
Katie J. Sieben	Commissioner
John A. Tuma	Commissioner

In the Matter of the Petition of Great Plains)
Natural Gas Co., a Division of Montana-)
Dakota Utilities Co., for Approval of a Gas) Docket No. G004/M-19-____
Utility Infrastructure Cost Adjustment True-)
up Report for 2018, 2019 Revenue)
Requirement and Revised Adjustment)
Factors)

SUMMARY OF FILING

Great Plains Natural Gas Co., (Great Plains) a Division of Montana-Dakota Utilities Co., established a Gas Utility Infrastructure Cost (GUIC) adjustment tariff in 2017 pursuant to Minn. Stat. § 216B.1635. Great Plains now submits a Petition for approval of the True-Up Report for 2018 reflecting a net under-recovered balance of \$200,605 and a 2019 revenue requirement of \$1,071,716 for a total of \$1,272,321 to be recovered effective with service rendered on and after October 1, 2019.

STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Dan Lipschultz	Commissioner – Vice Chair
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Utility Infrastructure Cost Adjustment True-)
up Report for 2018, 2019 Revenue)
Requirement and Revised Adjustment)
Factors)

PETITION

I. INTRODUCTION AND SUMMARY

Great Plains Natural Gas Co., (Great Plains) a Division of Montana-Dakota Utilities Co., established a Gas Utility Infrastructure Cost (GUIC) adjustment tariff in 2017 pursuant to Minn. Stat. § 216B.1635. Great Plains hereby petitions the Minnesota Public Utilities Commission (Commission) for approval of the annual update to its Gas Utility Infrastructure Cost (GUIC) tariff adjustment to be effective with service rendered on and after October 1, 2019¹. Exhibit A lists the matrix of information required by Minnesota Statute § 216B.1635 and identifies where the required information is contained in the filing.

As discussed below, Great Plains' authorized GUIC tariff allows Great Plains to continue to recover costs and expenses that will be incurred to comply with federal

¹ The effective date is consistent with the timing outlined in the GUIC tariff and the process changes as authorized in the Minnesota Public Utilities Commission Order issued March 21, 2018 in Docket No. G004/M-17-858.

regulations, specifically costs associated with the Distribution Integrity Management Program (DIMP). Great Plains respectfully requests to recover a 2019 revenue requirement of \$1,071,716 and a true up of the under recovery of \$200,605 of costs and expenses associated with the authorized 2018 PVC pipe mains and services replacement projects and projected 2019 expenditures for PVC mains and services replacements in its Minnesota communities. There are no operation and maintenance expenses associated with the projects.

II. BACKGROUND

Minnesota Statute § 216B.1635 allows utilities to seek rider recovery of gas utility infrastructure costs. Gas utility infrastructure costs are those that are not included in the gas utility's rate base in its most recent general rate case, and that are incurred in projects involving: (1) the replacement of natural gas facilities required by road construction or other public work by or on behalf of a government agency or (2) the replacement or modification of existing facilities required by a federal or state agency, including surveys, assessments, reassessment, and other work necessary to determine the need for replacement or modification of existing infrastructure.

In December of 2003, PHMSA published the Transmission Integrity Management Rule or the "TIMP Rule" (49 C.F.R. 192, Subpart O). The TIMP Rule specifies how operators must identify, prioritize, assess, evaluate, repair, and validate the safety and integrity of its transmission pipelines that could affect High Consequence Areas or "HCAs". HCAs are highly populated buildings or outdoor areas of population. As required by the rule, Great Plains implemented its TIMP program in December of 2004.

Since its inception, several revisions have been made to the program. The latest revision (Rev. 4) was made in September of 2013. Great Plains' TIMP program consists of Fifteen Sections along with three associated appendices.

In December 2006, the President signed into law the Pipeline Inspection, Protection, Enforcement and Safety Act or the "PIPES Act". As a result of the PIPES Act, PHMSA's regulatory and enforcement authority was strengthened. The PIPES Act also mandates PHMSA to prescribe minimum standards for pipeline safety and integrity management programs for distribution pipelines. As a result, the law requires operators of distribution pipelines to continually identify and assess risks on their distribution systems to remediate conditions that present a potential threat to the integrity of their pipeline system. Operators must also monitor the program's effectiveness.

As prescribed in the PIPES Act, PHMSA published the Integrity Management Program for Gas Distribution Pipelines Rule or the "DIMP Rule" (49 CFR Part 192, Subpart P) in December of 2009. DIMP requires operators to know the make-up of their distribution system along with the written development of a distribution pipeline safety and integrity management program. The objective of the plan is to develop a model to assist in determining which areas of the gas distribution system to focus operation, maintenance and repair efforts and resources due to known or predicted threats to the distribution system. As required by the rule, Great Plains implemented their DIMP program and is currently operating under the latest revision effective in March of 2014.

On December 21, 2016, Great Plains proposed a GUIC rider to recover costs incurred to comply with federal regulations that set standards governing the safety, reliability, and integrity of natural gas distribution assets and infrastructure. Great

Plains' DIMP program identified two capital projects for replacing polyvinyl chloride (PVC) pipe mains and services throughout the Company's service territory. In that filing, Great Plains proposed to recover the costs following the rate design approved by the Commission in the Company's most recent general rate case, excluding flexible rate customers. These customers are subject to competition and are therefore price-sensitive, meaning that changes in rates could persuade them to leave the system and obtain service elsewhere.

On October 6, 2017, the Commission issued an Order in Docket No. G004/M-16-1066 approving Great Plains' tracker and true-up mechanism as filed. On December 8, 2017, Great Plains' filed an Informational Update to request a change in the filing date from December 1 to April 15, to include a true-up calculation covering the twelve months ending December 31 of each year and rates to be effective 150 days following the date of filing. The Commission issued an Order approving the process changes on March 21, 2018. On April 13, 2018, Great Plains filed the update to the GUIC rider to true up costs through 2017, project 2018 costs, and apply revenues collected and projected through September 2018. The Commission issued an Order approving the update to the GUIC on February 12, 2019.

Exhibit B provides an overview of the replacement projects along with details of each capital project.

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 Montana-Dakota Utilities Co.
Company's Attorneys:	Brian M. Meloy Stinson Leonard Street LLP 50 South Sixth Street, Suite 2600 Minneapolis, MN 55402 Telephone: 612-335-1451
Date of Filing	April 15, 2019
Proposed Effective Date	October 1, 2019
Controlling Statute for Time in Processing the Filing	Minnesota Statute §216B.1635 does not establish a time for processing.
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 Montana-Dakota Utilities Co. Great Plains is engaged in business as a natural gas local distribution company serving 18 communities in Minnesota and one in North Dakota. Great Plains currently provides natural gas utility service to approximately 22,000 customers in Minnesota and approximately 2,300 customers in North Dakota.

B. The GUIC Adjustment Tariff and True-Up Mechanism

Great Plains is proposing to update its gas utility infrastructure cost (GUIC) adjustment tariff and implement a GUIC adjustment to be effective with service rendered on and after October 1, 2019 in accordance with the terms of the Gas

Utility Infrastructure Cost Adjustment tariff. The updated tariff is provided in Exhibit C.

The calculation of the revenue requirement to be recovered through the GUIC is shown on Exhibit D and includes the authorized return on investment, depreciation, ad valorem taxes and income taxes related to the projects. The rate of return is that authorized in Docket No. G004/GR-15-879 effective January 1, 2017.

The Company's filing does not include an adjustment related to the infrastructure being replaced under its replacement program nor does it include the associated cost of removal. The mains and services are accounted for as mass assets which does not maintain the accumulated reserve for individual sections of pipe. Therefore, upon retirement of mains and service, the original cost of plant in service is removed and applied to the accumulated reserve balance with no resulting change in rate base. The Company's experience has indicated that there is no salvage value associated with PVC mains and services which have been removed.

With respect to the 2017 Tax Cuts and Jobs Act (TCJA), Great Plains recalculated Accumulated Deferred Income Taxes (ADIT) for its existing GUIC assets as of December 31, 2018, but since accelerated tax depreciation still exceeds book depreciation for those assets, the Company concluded that no ADIT refund was warranted at this time. Great Plains will amortize and return excess ADIT in any future period in which the book depreciation exceeds tax depreciation in a manner consistent with the Commission's decision in Docket No. E,G-999/CI-17-895.

In order to maintain compliance with the Internal Revenue Service normalization rules for rates based on forecasted costs, Great Plains continues to apply the

proration methodology for deferred income taxes in a manner consistent with the methodology underlying the rates approved by the Commission in the prior year's GUIC in Docket No. G004/M-18-282.

Exhibit E is the proposed GUIC adjustment proposed to be effective with service rendered on and after October 1, 2019. The total GUIC adjustment amount of \$1,272,321 will be allocated to the rate classes (residential, firm general, small interruptible and large interruptible sales and transportation excluding the flexed transportation service agreements) based on the non-gas revenues authorized in Docket No. G004/GR-15-879.

The allocated revenue requirement was then divided by projected dk volumes for the period October 2019 – September 2020 to arrive at the adjustment per dk, with the proposed GUIC adjustment shown in the table below.

	Proposed Rate	Current Rate	Change
<u>Sales:</u>			
Residential	\$0.4221	\$0.2494	\$0.1727
Firm General	\$0.3104	\$0.1792	\$0.1312
Small Interruptible	\$0.2063	\$0.1519	\$0.0544
Large Interruptible	\$0.1683	\$0.1103	\$0.0580
<u>Transportation:</u>			
Small Interruptible	\$0.0731	\$0.0791	(\$0.0060)
Large Interruptible	\$0.0601	\$0.0105	\$0.0496

A copy of the customer notice bill insert has been provided in Exhibit G.

V. THE GUIC ADJUSTMENT IS IN THE PUBLIC INTEREST

The GUIC adjustment is in the public interest as it fully complies with the

requirements of Minn. Stat. § 216B.1635 in reflecting prudently incurred costs. The replacement of facilities for safety and reliability purposes benefits customers, as does the avoidance of a general rate case and the adjustment is consistent with the revenue allocation authorized in the last rate case (Docket No. G004/GR-15-879).

VI. FILING COMPLIANCE

The list of requirements set forth in Minn. Stat. §216B.1635 and Great Plains compliance with the requirements is contained in Exhibit A.

VII. CONCLUSION

Based on all of the information provided in this Petition, Great Plains respectfully requests that the Commission approve the Gas Utility Infrastructure Cost adjustment tariff and authorize the GUIC adjustment as set forth on Exhibit C effective with service rendered on and after October 1, 2019.

Respectfully submitted,

Great Plains Natural Gas Co.,
A Division of Montana-Dakota Utilities Co.

By: */s/ Tamie A. Aberle*

Tamie A. Aberle
Director of Regulatory Affairs

INFORMATION REQUIRED BY MINNESOTA PUBLIC UTILITIES
MINNESOTA STATUTE §216B.1635

<u>Minnesota Statute</u>	<u>Information Requested</u>	<u>Section and page of Application</u>
216B.1635 Subp. 2	<p>Gas Infrastructure Filing A public utility submitting a petition to recover gas infrastructure costs under this section must submit to the commission, the department, and interested parties a gas infrastructure project plan report and a petition for rate recovery of only incremental costs associated with projects under subdivision 1, paragraph (c). The report and petition must be made at least 150 days in advance of implementation of the rate schedule, provided that the rate schedule will not be implemented until the petition is approved by the commission pursuant to subdivision 5. The report must be for a forecast period of one year.</p>	Application
Subp. 3	<p>Gas infrastructure project plan report The gas infrastructure project plan report required to be filed under subdivision 2 shall include all pertinent information and supporting data on each proposed project including, but not limited to, project description and scope, estimated project costs, and project in-service date.</p>	Exhibit B
Subp. 4	<p>Cost recovery petition for utility's facilities Notwithstanding any other provision of this chapter, the commission may approve a rate schedule for the automatic annual adjustment of charges for gas utility infrastructure costs net of revenues under this section, including a rate of return, income taxes on the rate of return, incremental property taxes, incremental depreciation expense, and any incremental operation and maintenance costs. A gas utility's petition for approval of a rate schedule to recover gas utility infrastructure costs outside of a general rate case under section <u>216B.16</u> is subject to the following:</p>	

INFORMATION REQUIRED BY MINNESOTA PUBLIC UTILITIES
MINNESOTA STATUTE §216B.1635

<u>Minnesota Statute</u>	<u>Information Requested</u>	<u>Section and page of Application</u>
	(1) a gas utility may submit a filing under this section no more than once per year; and	
	(2) a gas utility must file sufficient information to satisfy the commission regarding the proposed GUIC. The information includes, but is not limited to:	
	(i) the information required to be included in the gas infrastructure project plan report under subdivision 3;	Exhibit B
	(ii) the government entity ordering or requiring the gas utility project and the purpose for which the project is undertaken;	Exhibit B
	(iii) a description of the estimated costs and salvage value, if any, associated with the existing infrastructure replaced or modified as a result of the project;	Exhibit B
	(iv) a comparison of the utility's estimated costs included in the gas infrastructure project plan and the actual costs incurred, including a description of the utility's efforts to ensure the costs of the facilities are reasonable and prudently incurred;	Exhibit B
	(v) calculations to establish that the rate adjustment is consistent with the terms of the rate schedule, including the proposed rate design and an explanation of why the proposed rate design is in the public interest;	Exhibit E and Exhibit F
	(vi) the magnitude and timing of any known future gas utility projects that the utility may seek to recover under this section;	Exhibit B
	(vii) the magnitude of GUIC in relation to the gas utility's base revenue as approved by the commission in the gas utility's most recent general rate case, exclusive of gas purchase costs and transportation charges;	Exhibit F

INFORMATION REQUIRED BY MINNESOTA PUBLIC UTILITIES
MINNESOTA STATUTE §216B.1635

<u>Minnesota Statute</u>	<u>Information Requested</u>	<u>Section and page of Application</u>
(viii)	the magnitude of GUIC in relation to the gas utility's capital expenditures since its most recent general rate case; and	Exhibit F
(ix)	the amount of time since the utility last filed a general rate case and the utility's reasons for seeking recovery outside of a general rate case.	Exhibit F
Subp. 6	Rate of return The return on investment for the rate adjustment shall be at the level approved by the commission in the public utility's last general rate case, unless the commission determines that a different rate of return is in the public interest.	Exhibit D

**GREAT PLAINS NATURAL GAS CO.
GAS UTILITY INFRASTRUCTURE COST ADJUSTMENT
PROJECT DETAIL**

TIMP Overview

Great Plains' TIMP plan assesses the integrity of transmission pipelines by the following criteria: High Consequence Areas (HCAs), threat and risk assessment. The integrity plan encompasses this information into three plans; the baseline assessment plan, direct assessment plan and remediation plan.

Once the pipeline has a baseline, there needs to be continuing evaluation of the pipeline integrity based on existing threats and new threats to the pipeline. The performance of the pipeline and assessment is updated periodically.

Great Plains TIMP plan requires the Company to conduct a direct assessment of its transmission line located in high consequence areas. Due to location of the transmission line and results of the Company's assessment, a remediation action is necessary to relocate the pipeline and eliminate the high consequence area.

TIMP Projects

Great Plains has no TIMP projects forecasted for 2019. Two projects were included in Great Plains most recent rate case, Docket No. G004/GR-15-879. The projects reflected in the filing were to replace the 6" transmission line in Fergus Falls, which is a HCA and to install pig launchers/receivers at both ends of the replaced line section.

DIMP Overview

Great Plains' DIMP model assesses nine different threat categories: Corrosion,

Natural Forces, Equipment Failure, Excavation, Incorrect Operation, Joint Failure, Outside Force, Missing Values, and Other, all equally weighted.

A detailed geographical information system (GIS) map, with every piece or component that makes up the gas distribution system, both above and below ground, and with as much information about each piece as is available is used as the basis of the model. Scores for various factors were determined by a group of subject matter experts including office engineers, field engineers and field technicians.

The model sets a 50 foot by 50 foot grid to analyze all components. Each grid is then analyzed by nine individual sub-models with up to 150 calculations in each sub-model. This in turn produces a very comprehensive look at the entire system. In Minnesota, 4.49 million feet of pipe was analyzed with approximately 870,000 calculations to support the risk model.

The results obtained from the DIMP modeling are consistent with what was expected by the Company's subject matter experts. The top three risks identified by the DIMP model for Great Plains were:

1. Excavation Damage (driven by PVC)
2. Material Failure (driven by PVC)
3. Corrosion (driven by older vintage steel systems)

The DIMP results are used as an operational tool to aid in directing resources to reduce pipeline risks. The results are consistently analyzed to determine accelerated actions to the pipeline so that changes to resource planning and budgeting can be made to carry out the reduction in risks from pipeline threats.

DIMP Projects

Great Plains previously included in its GUIC the actual cost of 2016 and 2017 projects, and projected costs of 2018 projects, submitted in Docket No. G004/M-18-282. Great Plains has two capital budget projects that are includable in the GUIC; replacing PVC pipe mains and services in its Minnesota communities. The two funding projects and associated amounts for 2016, 2017 and 2018, as well as the projected 2019 costs are shown below. The costs include the capital costs of replacing the mains and services as there is no salvage associated with the PVC mains and services. In future years, it is expected approximately \$3 million will be spent annually in continuing the PVC replacement throughout the system.

	Actual 2016	Actual 2017	Actual 2018	Projected 2019
Replace PVC mains	\$956,526	\$1,710,848	\$1,276,861	\$1,412,140
Replace PVC services	883,018	1,166,692	810,197	1,176,785
Total capital expenditure	\$1,839,544	\$2,877,540	\$2,087,058	\$2,588,925

Great Plains ensures that the costs of the projects are reasonable through 1) using a competitive bidding process with multiple contractors on larger projects and 2) closely watching costs to stay within the budgeted amounts or determine why expenditures were different from the budget. Overall, the projected expenditures are relatively stable over time.

The actual 2016 and 2017 GUIC project costs compared to the projections for the corresponding years were compared in Exhibit B of Docket No. G004/M-18-282 with the variances explained. In 2018, mains and services were replaced in Clarkfield and Pelican Rapids. At the end of 2018, approximately 45% of total mains and 55% of total services planned to be replaced has been completed. A comparison of year end costs

for the work completed in 2018, as included in this update filing, is compared to the 2018 estimated costs from the costs projected in Docket No. G004/M-18-282 below.

	2018 Actual	2018 Estimated As Filed	Variance	% Capital Variance
Replace PVC mains	\$1,276,861	\$1,275,000	\$1,861	0.15%
Replace PVC services	810,197	1,054,000	(243,803)	-23.13%
Total capital expenditure	\$2,087,058	\$2,329,000	(\$241,942)	-10.39%
Mains (feet)	50,706 1/	40,650	10,056	24.74%
Number of Services	439 1/	389	50	12.85%

1/ 2018 Actual Mains and Services by location:

Pelican Rapids	28,909	182
Clarkfield	21,797	257

The list of planned PVC replacements is shown below. Great Plains is requesting an update to the GUIC rates to continue the recovery of the 2016, 2017 and 2018 projects, as well as include recovery for the projected 2019 projects.

Year	Location	Budget 2/	
		Mains	Services
2019	Pelican Rapids	10,042	147
	Montevideo	39,270	564

2/ Based on Request for Proposal.

The 2019 projects identified are being bid through a Request for Proposal (RFP) process. The bid process will be finalized in April. The costs and footages shown above are based on the quantities in the RFP.

Exhibit C



GREAT PLAINS NATURAL GAS CO.

A Division of Montana-Dakota Utilities Co.

State of Minnesota Gas Rate Schedule – MNPUC Volume 2

Section No. 5
2nd Revised Sheet No. 5-131
Canceling 1st Revised Sheet No. 5-131

GAS UTILITY INFRASTRUCTURE COST ADJUSTMENT

twelve months ending December 31. The amount may be an under recovery or (over) recovery.

- b. The resulting balance is divided by the projected annual dk sales and transportation volumes.
- 3. When the Company files its next general rate case, all project costs shall be removed from the GUIC tracker and included in base rates. Only the true-up component (remaining GUIC tracker balance) shall remain in the GUIC Rider to be either collected or refunded to customers over a subsequent period.
- 4. The current GUIC adjustment for each rate class is (excluding flexible rate contracts):

	Adjustment Per Dk
<u>Sales</u>	
Residential	\$0.4221
Firm General	0.3104
Small Interruptible	0.2063
Large Interruptible	0.1683
<u>Transportation</u>	
Small Interruptible	0.0731
Large Interruptible	0.0601

Date Filed: April 15, 2019

Effective Date:

Issued By: Tamie A. Aberle
Director – Regulatory Affairs

Docket No.:



GREAT PLAINS NATURAL GAS CO.

A Division of Montana-Dakota Utilities Co.

State of Minnesota Gas Rate Schedule – MNPUC Volume 2

Section No. 5
1st Revised Sheet No. 5-131
Canceling Original Sheet No. 5-131

GAS UTILITY INFRASTRUCTURE COST ADJUSTMENT

twelve months ending December 31. The amount may be an under recovery or (over) recovery.

- b. The resulting balance is divided by the projected annual dk sales and transportation volumes.
- 3. When the Company files its next general rate case, all project costs shall be removed from the GUIC tracker and included in base rates. Only the true-up component (remaining GUIC tracker balance) shall remain in the GUIC Rider to be either collected or refunded to customers over a subsequent period.
- 4. The current GUIC adjustment for each rate class is (excluding flexible rate contracts):

	Adjustment Per Dk
<u>Sales</u>	
Residential	\$0.2494 0.4221
Firm General	0.1792 0.3104
Small Interruptible	0.1519 0.2063
Large Interruptible	0.1103 0.1683
<u>Transportation</u>	
Small Interruptible	0.0791 0.0731
Large Interruptible	0.0105 0.0601

Date Filed:	February 15, 2019	Effective Date:	Service rendered on and after March 1, 2019
Issued By:	Tamie A. Aberle Director – Regulatory Affairs	Docket No.:	G004/M-18-282

**GREAT PLAINS NATURAL GAS CO.
GUIC REVENUE REQUIREMENT
OVERALL REVENUE REQUIREMENT**

GUIC Costs and Recoveries

2017 Revenue Requirement	\$395,916	1/
2018 Revenue Requirement - True Up	<u>780,496</u>	2/
	\$1,176,412	
Actual Recoveries (Nov 2017 - Dec 2018)	<u>(\$571,363)</u>	
Under/(Over) Recovery - December 2018	\$605,049	
Estimated Recoveries (Jan 2019 - Sept 2019)	<u>(404,444)</u>	
Subtotal - GUIC Under Recovery	\$200,605	
2019 Revenue Requirement	<u>\$1,071,716</u>	2/
Total Required Recovery - Oct 2019 - Sep 2020	<u><u>\$1,272,321</u></u>	

1/ Docket No. G004/M-18-282, Exhibit D, page 1.

2/ Exhibit D, page 2.

**GREAT PLAINS NATURAL GAS CO.
GUIC REVENUE REQUIREMENT
ACTUAL 2018
FOR TRUE UP**

	<u>Total</u>	<u>Mains 1/</u>	<u>Services 2/</u>
Depreciation Expense	\$185,605	\$96,972	\$88,633
Ad Valorem Taxes	121,114	70,207	50,907
Return	374,273	215,945	158,328
Income Taxes	(124,826)	(69,208)	(55,618)
Gross up for Taxes	224,330	126,618	97,712
Total	<u>\$780,496</u>	<u>\$440,534</u>	<u>\$339,962</u>
Total Plant Dec 2016	\$1,839,544	\$956,526 3/	\$883,018 4/
Total Plant Dec 2017	2,877,540	1,710,848 5/	1,166,692 6/
Plant Investment	2,087,058	1,276,861 7/	810,197 8/
Total Plant Dec 2018	<u>\$6,804,142</u>	<u>\$3,944,235</u>	<u>\$2,859,907</u>

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PROJECTED 2019

	<u>Total</u>	<u>Mains 5/</u>	<u>Services 6/</u>
Depreciation Expense	\$259,294	\$136,482	\$122,812
Ad Valorem Taxes	167,197	95,343	71,854
Return	509,712	294,650	215,062
Income Taxes	(172,520)	(95,497)	(77,023)
Gross up for Taxes	308,033	173,836	134,197
Total	<u>\$1,071,716</u>	<u>\$604,814</u>	<u>\$466,902</u>
Total Plant Dec 2018	\$6,804,142	\$3,944,235	\$2,859,907
Plant Investment	2,588,925	1,412,140 7/	1,176,785 7/
Total Plant Projected 2019	<u>\$9,393,067</u>	<u>\$5,356,375</u>	<u>\$4,036,692</u>

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GREAT PLAINS NATURAL GAS CO.
 GUIC PLANT ADDITIONS - MAINS
 2018 REVENUE REQUIREMENT

	2018 TRUE UP												
	January	February	March	April	May	June	July	August	September	October	November	December	
Mains													
Plant in Service	2,667,374	2,667,612	2,669,191	2,669,191	2,669,191	2,997,757	3,224,027	3,595,369	3,809,010	3,865,683	3,914,131	3,944,235	
Accumulated Reserve	44,415	51,328	58,242	65,160	72,078	78,996	86,765	95,121	104,439	114,311	124,330	134,474	
ADIT	57,474	60,259	62,763	64,996	66,947	68,625	70,022	71,138	71,982	72,545	72,836	72,845	
Rate Base	2,565,485	2,556,025	2,548,186	2,539,035	2,530,166	2,850,136	3,067,240	3,429,110	3,632,589	3,678,827	3,716,965	3,736,916	
	Total												
Return @ 7.032% 1/	215,945	15,034	14,978	14,932	14,879	14,827	16,702	17,974	20,095	21,287	21,558	21,781	21,898
Expenses													
O&M	\$0												
Depreciation	96,972	6,913	6,913	6,914	6,918	6,918	6,918	7,769	8,356	9,318	9,872	10,019	10,144
Ad Valorem Taxes	70,207	3,957	3,957	3,960	3,960	3,960	4,447	4,783	5,334	5,650	5,734	5,806	18,659
Total Expenses	167,179	10,870	10,870	10,874	10,878	10,878	11,365	12,552	13,690	14,968	15,606	15,825	28,803
Income before taxes	(167,179)	(10,870)	(10,870)	(10,874)	(10,878)	(10,878)	(11,365)	(12,552)	(13,690)	(14,968)	(15,606)	(15,825)	(28,803)
Interest expense	73,610	5,125	5,106	5,090	5,072	5,054	5,693	6,127	6,850	7,256	7,348	7,425	7,464
	(240,789)	(15,995)	(15,976)	(15,964)	(15,950)	(15,932)	(17,058)	(18,679)	(20,540)	(22,224)	(22,954)	(23,250)	(36,267)
Income Taxes	69,208	4,597	4,592	4,588	4,584	4,579	4,903	5,369	5,904	6,388	6,597	6,683	10,424
Operating Income	(97,971)	(6,273)	(6,278)	(6,286)	(6,294)	(6,299)	(6,462)	(7,183)	(7,786)	(8,580)	(9,009)	(9,142)	(18,379)
Revenue Requirement	\$440,534	\$29,901	\$29,830	\$29,776	\$29,713	\$29,647	\$32,507	\$35,304	\$39,127	\$41,914	\$42,896	\$43,396	\$56,523

1/ Authorized in Docket No. G004/GR-15-879.

GREAT PLAINS NATURAL GAS CO.
 GUIC PLANT ADDITIONS - SERVICES
 2018 REVENUE REQUIREMENT

Services	2018 TRUE UP												
	January	February	March	April	May	June	July	August	September	October	November	December	
Plant in Service	2,049,710	2,053,325	2,055,229	2,056,050	2,056,050	2,198,879	2,355,655	2,618,248	2,727,964	2,787,898	2,833,370	2,859,907	
Accumulated Reserve	49,181	55,706	62,243	68,786	75,331	81,876	88,876	96,375	104,710	113,394	122,269	131,289	
ADIT	42,390	44,101	45,639	47,010	48,209	49,239	50,098	50,784	51,302	51,648	51,826	51,832	
Rate Base	1,958,139	1,953,518	1,947,347	1,940,254	1,932,510	2,067,764	2,216,681	2,471,089	2,571,952	2,622,856	2,659,275	2,676,786	
	<u>Total</u>												
Return @ 7.032% 1/	158,328	11,475	11,448	11,411	11,370	11,325	12,117	12,990	14,481	15,072	15,370	15,583	15,686
Expenses													
O&M	0												
Depreciation	88,633	6,525	6,525	6,537	6,543	6,545	6,545	7,000	7,499	8,335	8,684	8,875	9,020
Ad Valorem Taxes	50,907	3,041	3,046	3,049	3,050	3,050	3,262	3,495	3,884	4,047	4,136	4,203	12,644
Total Expenses	139,540	9,566	9,571	9,586	9,593	9,595	9,807	10,495	11,383	12,382	12,820	13,078	21,664
Income before taxes	(139,540)	(9,566)	(9,571)	(9,586)	(9,593)	(9,595)	(9,807)	(10,495)	(11,383)	(12,382)	(12,820)	(13,078)	(21,664)
Interest expense	53,968	3,911	3,902	3,890	3,876	3,860	4,130	4,428	4,936	5,137	5,239	5,312	5,347
	(193,508)	(13,477)	(13,473)	(13,476)	(13,469)	(13,455)	(13,937)	(14,923)	(16,319)	(17,519)	(18,059)	(18,390)	(27,011)
Income Taxes	55,618	3,874	3,872	3,873	3,871	3,867	4,006	4,289	4,690	5,035	5,191	5,286	7,764
Operating Income	(83,922)	(5,692)	(5,699)	(5,713)	(5,722)	(5,728)	(5,801)	(6,206)	(6,693)	(7,347)	(7,629)	(7,792)	(13,900)
Revenue Requirement	\$339,962	\$24,091	\$24,063	\$24,031	\$23,886	\$23,931	\$25,145	\$26,939	\$29,715	\$31,462	\$32,276	\$32,803	\$41,520

1/ Authorized in Docket No. G004/GR-15-879.

GREAT PLAINS NATURAL GAS CO.
 GUIC PLANT ADDITIONS - MAINS
 2019 REVENUE REQUIREMENT

Mains	2019 PROJECTED												
	January	February	March	April	May	June	July	August	September	October	November	December	
Plant in Service	3,945,676	3,947,117	3,948,558	4,020,606	4,135,883	4,308,798	4,481,713	4,683,447	4,899,591	5,101,325	5,245,421	5,356,375	
Accumulated Reserve	144,696	154,922	165,151	175,384	185,804	196,523	207,690	219,305	231,443	244,141	257,362	270,956	
ADIT	98,176	101,839	105,134	108,069	110,634	112,841	114,679	116,147	117,257	117,997	118,379	118,391	
Rate Base	3,702,804	3,690,356	3,678,273	3,737,153	3,839,445	3,999,434	4,159,344	4,347,995	4,550,891	4,739,187	4,869,680	4,967,028	
	Total												
Return @ 7.032% 1/	294,650	21,698	21,625	21,555	21,900	22,499	23,437	24,374	25,479	26,668	27,772	28,536	29,107
Expenses													
O&M	\$0												
Depreciation	136,482	10,222	10,226	10,229	10,233	10,420	10,719	11,167	11,615	12,138	12,698	13,221	13,594
Ad Valorem Taxes	95,343	5,853	5,855	5,857	5,964	6,135	6,392	6,648	6,947	7,268	7,567	7,781	23,076
Total Expenses	231,825	16,075	16,081	16,086	16,197	16,555	17,111	17,815	18,562	19,406	20,265	21,002	36,670
Income before taxes	(231,825)	(16,075)	(16,081)	(16,086)	(16,197)	(16,555)	(17,111)	(17,815)	(18,562)	(19,406)	(20,265)	(21,002)	(36,670)
Interest expense	100,436	7,396	7,371	7,347	7,465	7,669	7,989	8,308	8,685	9,090	9,467	9,727	9,922
	(332,261)	(23,471)	(23,452)	(23,433)	(23,662)	(24,224)	(25,100)	(26,123)	(27,247)	(28,496)	(29,732)	(30,729)	(46,592)
Income Taxes	95,497	6,746	6,741	6,735	6,801	6,962	7,214	7,508	7,831	8,190	8,546	8,832	13,391
Operating Income	(136,328)	(9,329)	(9,340)	(9,351)	(9,396)	(9,593)	(9,897)	(10,307)	(10,731)	(11,216)	(11,719)	(12,170)	(23,279)
Revenue Requirement	\$604,814	\$43,542	\$43,455	\$43,372	\$43,919	\$45,036	\$46,779	\$48,670	\$50,815	\$53,165	\$55,420	\$57,125	\$73,516

1/ Authorized in Docket No. G004/GR-15-879.

**GREAT PLAINS NATURAL GAS CO.
GUIC PLANT ADDITIONS - SERVICES
2019 REVENUE REQUIREMENT**

Services	2019 PROJECTED												
	January	February	March	April	May	June	July	August	September	October	November	December	
Plant in Service	2,861,108	2,862,309	2,863,510	2,923,550	3,019,614	3,163,710	3,307,806	3,475,918	3,656,038	3,824,150	3,944,230	4,036,692	
Accumulated Reserve	140,393	149,501	158,555	167,612	176,861	186,415	196,428	206,900	217,907	229,487	241,603	254,101	
ADIT	67,486	69,825	71,928	73,802	75,440	76,850	78,024	78,961	79,669	80,142	80,386	80,393	
Rate Base	2,653,229	2,642,983	2,633,027	2,682,136	2,767,313	2,900,445	3,033,354	3,190,057	3,358,462	3,514,521	3,622,241	3,702,198	
	Total												
Return @ 7.032% 1/	215,062	15,548	15,488	15,430	15,717	16,216	16,997	17,775	18,694	19,681	20,595	21,226	21,695
Expenses													
O&M	0												
Depreciation	122,812	9,104	9,108	9,054	9,057	9,249	9,554	10,013	10,472	11,007	11,580	12,116	12,498
Ad Valorem Taxes	71,854	4,245	4,247	4,248	4,337	4,480	4,694	4,907	5,157	5,424	5,673	5,851	18,591
Total Expenses	194,666	13,349	13,355	13,302	13,394	13,729	14,248	14,920	15,629	16,431	17,253	17,967	31,089
Income before taxes	(194,666)	(13,349)	(13,355)	(13,302)	(13,394)	(13,729)	(14,248)	(14,920)	(15,629)	(16,431)	(17,253)	(17,967)	(31,089)
Interest expense	73,308	5,300	5,279	5,259	5,358	5,528	5,794	6,059	6,372	6,709	7,020	7,235	7,395
	(267,974)	(18,649)	(18,634)	(18,561)	(18,752)	(19,257)	(20,042)	(20,979)	(22,001)	(23,140)	(24,273)	(25,202)	(38,484)
Income Taxes	77,023	5,360	5,356	5,335	5,390	5,535	5,760	6,030	6,324	6,651	6,977	7,244	11,061
Operating Income	(117,643)	(7,989)	(7,999)	(7,967)	(8,004)	(8,194)	(8,488)	(8,890)	(9,305)	(9,780)	(10,276)	(10,723)	(20,028)
Revenue Requirement	\$466,902	\$33,031	\$32,961	\$32,834	\$33,289	\$34,256	\$35,764	\$37,420	\$39,292	\$41,344	\$43,323	\$44,836	\$58,552

1/ Authorized in Docket No. G004/GR-15-879.

GREAT PLAINS NATURAL GAS CO.
 GUIC PLANT ADDITIONS - MAINS
 2016 ADDITIONS - 2018 GUIC

	2018												
	Total	January	February	March	April	May	June	July	August	September	October	November	December
Replace PVC Main Expenditures	\$0												
Close to Plant (cumulative)	956,526	956,526	956,526	956,526	956,526	956,526	956,526	956,526	956,526	956,526	956,526	956,526	956,526
Depreciation	29,748	2,479	2,479	2,479	2,479	2,479	2,479	2,479	2,479	2,479	2,479	2,479	2,479
Accumulated Reserve	61,118	33,849	36,328	38,807	41,286	43,765	46,244	48,723	51,202	53,681	56,160	58,639	61,118
ADIT - see page 14 1/	34,971	31,179	31,866	32,484	33,035	33,516	33,930	34,275	34,550	34,758	34,897	34,969	34,971
Net Plant	\$860,437	\$891,498	\$888,332	\$885,235	\$882,205	\$879,245	\$876,352	\$873,528	\$870,774	\$868,087	\$865,469	\$862,918	\$860,437
Ad Valorem Taxes	\$17,026	1,419	1,419	1,419	1,419	1,419	1,419	1,419	1,419	1,419	1,419	1,419	1,417

GREAT PLAINS NATURAL GAS CO.
 GUIC PLANT ADDITIONS - MAINS
 2016 ADDITIONS - 2019 GUIC

	PROJECTED 2019												
	Total	January	February	March	April	May	June	July	August	September	October	November	December
Replace PVC Main Expenditures	\$0												
Close to Plant (cumulative)	956,526	956,526	956,526	956,526	956,526	956,526	956,526	956,526	956,526	956,526	956,526	956,526	956,526
Depreciation	29,748	2,479	2,479	2,479	2,479	2,479	2,479	2,479	2,479	2,479	2,479	2,479	2,479
Accumulated Reserve	90,866	63,597	66,076	68,555	71,034	73,513	75,992	78,471	80,950	83,429	85,908	88,387	90,866
ADIT - see page 14 1/	44,143	40,880	41,471	42,003	42,477	42,891	43,247	43,544	43,781	43,960	44,079	44,141	44,143
Net Plant	\$821,517	\$852,049	\$848,979	\$845,968	\$843,015	\$840,122	\$837,287	\$834,511	\$831,795	\$829,137	\$826,539	\$823,998	\$821,517
Ad Valorem Taxes	\$17,026	1,419	1,419	1,419	1,419	1,419	1,419	1,419	1,419	1,419	1,419	1,419	1,417

1/ Balances based on monthly proration methodology.

GREAT PLAINS NATURAL GAS CO.
 GUIC PLANT ADDITIONS - SERVICES
 2016 ADDITIONS - 2018 GUIC

	2018												
	Total	January	February	March	April	May	June	July	August	September	October	November	December
Replace PVC Services													
Expenditures	\$0												
Close to Plant (cumulative)	883,018	883,018	883,018	883,018	883,018	883,018	883,018	883,018	883,018	883,018	883,018	883,018	883,018
Depreciation	33,732	2,811	2,811	2,811	2,811	2,811	2,811	2,811	2,811	2,811	2,811	2,811	2,811
Accumulated Reserve	71,190	40,269	43,080	45,891	48,702	51,513	54,324	57,135	59,946	62,757	65,568	68,379	71,190
ADIT - see page 14 1/	27,933	25,128	25,636	26,093	26,500	26,856	27,162	27,417	27,621	27,775	27,878	27,931	27,933
Net Plant	\$783,895	\$817,621	\$814,302	\$811,034	\$807,816	\$804,649	\$801,532	\$798,466	\$795,451	\$792,486	\$789,572	\$786,708	\$783,895
Ad Valorem Taxes	\$15,718	1,310	1,310	1,310	1,310	1,310	1,310	1,310	1,310	1,310	1,310	1,310	1,308

GREAT PLAINS NATURAL GAS CO.
 GUIC PLANT ADDITIONS - SERVICES
 2016 ADDITIONS - 2019 GUIC

	PROJECTED 2019												
	Total	January	February	March	April	May	June	July	August	September	October	November	December
Replace PVC Services													
Expenditures	\$0												
Close to Plant (cumulative)	883,018	883,018	883,018	883,018	883,018	883,018	883,018	883,018	883,018	883,018	883,018	883,018	883,018
Depreciation	33,732	2,811	2,811	2,811	2,811	2,811	2,811	2,811	2,811	2,811	2,811	2,811	2,811
Accumulated Reserve	104,922	74,001	76,812	79,623	82,434	85,245	88,056	90,867	93,678	96,489	99,300	102,111	104,922
ADIT - see page 14 1/	34,599	32,283	32,703	33,080	33,416	33,710	33,963	34,174	34,342	34,469	34,554	34,598	34,599
Net Plant	\$743,497	\$776,734	\$773,503	\$770,315	\$767,168	\$764,063	\$760,999	\$757,977	\$754,998	\$752,060	\$749,164	\$746,309	\$743,497
Ad Valorem Taxes	\$15,718	1,310	1,310	1,310	1,310	1,310	1,310	1,310	1,310	1,310	1,310	1,310	1,308

1/ Balances based on monthly proration methodology.

**GREAT PLAINS NATURAL GAS CO.
GUIC PLANT ADDITIONS - MAINS
2017 ADDITIONS - GUIC 2018**

	2018												
	Total	January	February	March	April	May	June	July	August	September	October	November	December
Replace PVC Main													
Expenditures	\$0												
Close to Plant (cumulative)	\$1,710,848	1,710,848	1,710,848	1,710,848	1,710,848	1,710,848	1,710,848	1,710,848	1,710,848	1,710,848	1,710,848	1,710,848	1,710,848
Depreciation	53,208	4,434	4,434	4,434	4,434	4,434	4,434	4,434	4,434	4,434	4,434	4,434	4,434
Accumulated Reserve	59,340	10,566	15,000	19,434	23,868	28,302	32,736	37,170	41,604	46,038	50,472	54,906	59,340
ADIT - see page 15 1/	\$33,366	25,551	26,967	28,240	29,375	30,367	31,220	31,930	32,498	32,927	33,213	33,361	33,366
Net Plant	\$1,618,142	1,674,731	1,668,881	1,663,174	1,657,605	1,652,179	1,646,892	1,641,748	1,636,746	1,631,883	1,627,163	1,622,581	1,618,142
Ad Valorem Taxes	\$30,453	2,538	2,538	2,538	2,538	2,538	2,538	2,538	2,538	2,538	2,538	2,538	2,535

**GREAT PLAINS NATURAL GAS CO.
GUIC PLANT ADDITIONS - MAINS
2017 ADDITIONS - GUIC 2019**

	PROJECTED 2019												
	Total	January	February	March	April	May	June	July	August	September	October	November	December
Replace PVC Main													
Expenditures	\$0												
Close to Plant (cumulative)	\$1,710,848	1,710,848	1,710,848	1,710,848	1,710,848	1,710,848	1,710,848	1,710,848	1,710,848	1,710,848	1,710,848	1,710,848	1,710,848
Depreciation	53,208	4,434	4,434	4,434	4,434	4,434	4,434	4,434	4,434	4,434	4,434	4,434	4,434
Accumulated Reserve	112,548	63,774	68,208	72,642	77,076	81,510	85,944	90,378	94,812	99,246	103,680	108,114	112,548
ADIT - see page 15 1/	\$52,338	45,552	46,782	47,888	48,873	49,734	50,475	51,092	51,585	51,958	52,206	52,334	52,338
Net Plant	\$1,545,962	1,601,522	1,595,858	1,590,318	1,584,899	1,579,604	1,574,429	1,569,378	1,564,451	1,559,644	1,554,962	1,550,400	1,545,962
Ad Valorem Taxes	\$30,453	2,538	2,538	2,538	2,538	2,538	2,538	2,538	2,538	2,538	2,538	2,538	2,535

1/ Balances based on monthly proration methodology.

**GREAT PLAINS NATURAL GAS CO.
GUIC PLANT ADDITIONS - SERVICES
2017 ADDITIONS - GUIC 2018**

	2018												
	Total	January	February	March	April	May	June	July	August	September	October	November	December
Replace PVC Services													
Expenditures	\$0												
Close to Plant (cumulative)	\$1,166,692	1,166,692	1,166,692	1,166,692	1,166,692	1,166,692	1,166,692	1,166,692	1,166,692	1,166,692	1,166,692	1,166,692	1,166,692
Depreciation	44,568	3,714	3,714	3,714	3,714	3,714	3,714	3,714	3,714	3,714	3,714	3,714	3,714
Accumulated Reserve	49,766	8,912	12,626	16,340	20,054	23,768	27,482	31,196	34,910	38,624	42,338	46,052	49,766
ADIT - see page 15 1/	\$21,229	16,821	17,620	18,338	18,978	19,538	20,019	20,420	20,740	20,982	21,143	21,226	21,229
Net Plant	\$1,095,697	1,140,959	1,136,446	1,132,014	1,127,660	1,123,386	1,119,191	1,115,076	1,111,042	1,107,086	1,103,211	1,099,414	1,095,697
Ad Valorem Taxes	\$20,767	1,731	1,731	1,731	1,731	1,731	1,731	1,731	1,731	1,731	1,731	1,731	1,726

**GREAT PLAINS NATURAL GAS CO.
GUIC PLANT ADDITIONS - SERVICES
2017 ADDITIONS - GUIC 2019**

	PROJECTED 2019												
	Total	January	February	March	April	May	June	July	August	September	October	November	December
Replace PVC Services													
Expenditures	\$0												
Close to Plant (cumulative)	\$1,166,692	1,166,692	1,166,692	1,166,692	1,166,692	1,166,692	1,166,692	1,166,692	1,166,692	1,166,692	1,166,692	1,166,692	1,166,692
Depreciation	43,988	3,714	3,714	3,656	3,656	3,656	3,656	3,656	3,656	3,656	3,656	3,656	3,656
Accumulated Reserve	93,754	53,480	57,194	60,850	64,506	68,162	71,818	75,474	79,130	82,786	86,442	90,098	93,754
ADIT - see page 15 1/	\$31,861	28,092	28,775	29,389	29,936	30,414	30,826	31,169	31,443	31,650	31,788	31,859	31,861
Net Plant	\$1,041,077	1,085,120	1,080,723	1,076,453	1,072,250	1,068,116	1,064,048	1,060,049	1,056,119	1,052,256	1,048,462	1,044,735	1,041,077
Ad Valorem Taxes	\$20,767	1,731	1,731	1,731	1,731	1,731	1,731	1,731	1,731	1,731	1,731	1,731	1,726

1/ Balances based on monthly proration methodology.

**GREAT PLAINS NATURAL GAS CO.
GUIC PLANT ADDITIONS - MAINS
2018 ADDITIONS - ACTUAL 2018 TRUE UP**

	2018												
	Total	January	February	March	April	May	June	July	August	September	October	November	December
Replace PVC Main Expenditures	\$1,209,429	\$0	\$521	\$2,371	\$755	\$73,683	\$295,415	\$185,660	\$377,379	\$138,420	\$56,673	\$48,448	\$30,104
Close to Plant (cumulative)	1,276,861	0	238	1,817	1,817	1,817	330,383	556,653	927,995	1,141,636	1,198,309	1,246,757	1,276,861
Depreciation	14,016	0	0	1	5	5	5	856	1,443	2,405	2,959	3,106	3,231
Accumulated Reserve	14,016	0	0	1	6	11	16	872	2,315	4,720	7,679	10,785	14,016
ADIT- see page 16 1/	\$4,508	744	1,426	2,039	2,586	3,064	3,475	3,817	4,090	4,297	4,435	4,506	4,508
Net Plant	\$1,258,337	(\$744)	(\$1,188)	(\$223)	(\$775)	(\$1,258)	\$326,892	\$551,964	\$921,590	\$1,132,619	\$1,186,195	\$1,231,466	\$1,258,337
Ad Valorem Taxes	\$22,728	\$0	\$0	\$3	\$3	\$3	\$490	\$826	\$1,377	\$1,693	\$1,777	\$1,849	\$14,707

**GREAT PLAINS NATURAL GAS CO.
GUIC PLANT ADDITIONS - MAINS
2018 ADDITIONS - 2019 GUIC**

	PROJECTED 2019												
	Total	January	February	March	April	May	June	July	August	September	October	November	December
Replace PVC Main Expenditures	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Close to Plant (cumulative)	1,276,861	1,276,861	1,276,861	1,276,861	1,276,861	1,276,861	1,276,861	1,276,861	1,276,861	1,276,861	1,276,861	1,276,861	1,276,861
Depreciation	39,708	3,309	3,309	3,309	3,309	3,309	3,309	3,309	3,309	3,309	3,309	3,309	3,309
Accumulated Reserve	53,724	17,325	20,634	23,943	27,252	30,561	33,870	37,179	40,488	43,797	47,106	50,415	53,724
ADIT- see page 16 1/	\$16,721	10,888	11,945	12,896	13,743	14,483	15,120	15,650	16,074	16,394	16,608	16,718	16,721
Net Plant	\$1,206,416	\$1,248,648	\$1,244,282	\$1,240,022	\$1,235,866	\$1,231,817	\$1,227,871	\$1,224,032	\$1,220,299	\$1,216,670	\$1,213,147	\$1,209,728	\$1,206,416
Ad Valorem Taxes	\$22,728	\$1,894	\$1,894	\$1,894	\$1,894	\$1,894	\$1,894	\$1,894	\$1,894	\$1,894	\$1,894	\$1,894	\$1,894

1/ Balances based on monthly proration methodology.

GREAT PLAINS NATURAL GAS CO.
 GUIC PLANT ADDITIONS - SERVICES
 2018 ADDITIONS - ACTUAL 2018 TRUE UP

	2018												
	Total	January	February	March	April	May	June	July	August	September	October	November	December
Replace PVC Services													
Expenditures	\$804,583	\$0	\$3,615	\$2,367	\$1,112	\$6,252	\$158,902	\$138,525	\$288,408	\$73,459	\$59,934	\$45,472	\$26,537
Close to Plant (cumulative)	810,197	0	3,615	5,519	6,340	6,340	149,169	305,945	568,538	678,254	738,188	783,660	810,197
Depreciation	10,333	0	0	12	18	20	20	475	974	1,810	2,159	2,350	2,495
Accumulated Reserve	10,333	0	0	12	30	50	70	545	1,519	3,329	5,488	7,838	10,333
ADIT- see page 16 1/	\$2,670	441	845	1,208	1,532	1,815	2,058	2,261	2,423	2,545	2,627	2,669	2,670
Net Plant	\$797,194	(\$441)	\$2,770	\$4,299	\$4,778	\$4,475	\$147,041	\$303,139	\$564,596	\$672,380	\$730,073	\$773,153	\$797,194
Ad Valorem Taxes	\$14,422	\$0	\$5	\$8	\$9	\$9	\$221	\$454	\$843	\$1,006	\$1,095	\$1,162	\$9,610

GREAT PLAINS NATURAL GAS CO.
 GUIC PLANT ADDITIONS - SERVICES
 2018 ADDITIONS - 2019 GUIC

	PROJECTED 2019												
	Total	January	February	March	April	May	June	July	August	September	October	November	December
Replace PVC Services													
Expenditures	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Close to Plant (cumulative)	810,197	810,197	810,197	810,197	810,197	810,197	810,197	810,197	810,197	810,197	810,197	810,197	810,197
Depreciation	30,948	2,579	2,579	2,579	2,579	2,579	2,579	2,579	2,579	2,579	2,579	2,579	2,579
Accumulated Reserve	41,281	12,912	15,491	18,070	20,649	23,228	25,807	28,386	30,965	33,544	36,123	38,702	41,281
ADIT- see page 16 1/	\$9,430	6,368	6,923	7,422	7,867	8,256	8,590	8,868	9,090	9,258	9,370	9,428	9,430
Net Plant	\$759,486	\$790,917	\$787,783	\$784,705	\$781,681	\$778,713	\$775,800	\$772,943	\$770,142	\$767,395	\$764,704	\$762,067	\$759,486
Ad Valorem Taxes	\$14,422	\$1,202	\$1,202	\$1,202	\$1,202	\$1,202	\$1,202	\$1,202	\$1,202	\$1,202	\$1,202	\$1,202	\$1,200

1/ Balances based on monthly proration methodology.

GREAT PLAINS NATURAL GAS CO.
GUIC PLANT ADDITIONS - MAINS
2019 ADDITIONS - PROJECTED

	PROJECTED 2019												
	Total	January	February	March	April	May	June	July	August	September	October	November	December
Replace PVC Main Expenditures	\$1,412,140	\$1,441	\$1,441	\$1,441	\$72,048	\$115,277	\$172,915	\$172,915	\$201,734	\$216,144	\$201,734	\$144,096	\$110,954
Close to Plant (cumulative)	1,412,140	1,441	2,882	4,323	76,371	191,648	364,563	537,478	739,212	955,356	1,157,090	1,301,186	1,412,140
Depreciation	13,818	0	4	7	11	198	497	945	1,393	1,916	2,476	2,999	3,372
Accumulated Reserve	13,818	0	4	11	22	220	717	1,662	3,055	4,971	7,447	10,446	13,818
ADIT- see page 17 1/	\$5,189	856	1,641	2,347	2,976	3,526	3,999	4,393	4,707	4,945	5,104	5,186	5,189
Net Plant	\$1,393,133	\$585	\$1,237	\$1,965	\$73,373	\$187,902	\$359,847	\$531,423	\$731,450	\$945,440	\$1,144,539	\$1,285,554	\$1,393,133
Ad Valorem Taxes	\$25,136	\$2	\$4	\$6	\$113	\$284	\$541	\$797	\$1,096	\$1,417	\$1,716	\$1,930	\$17,230

GREAT PLAINS NATURAL GAS CO.
GUIC PLANT ADDITIONS - SERVICES
2019 ADDITIONS - PROJECTED

	PROJECTED 2019												
	Total	January	February	March	April	May	June	July	August	September	October	November	December
Replace PVC Services Expenditures	\$1,176,785	\$1,201	\$1,201	\$1,201	\$60,040	\$96,064	\$144,096	\$144,096	\$168,112	\$180,120	\$168,112	\$120,080	\$92,462
Close to Plant (cumulative)	1,176,785	1,201	2,402	3,603	63,643	159,707	303,803	447,899	616,011	796,131	964,243	1,084,323	1,176,785
Depreciation	14,144	0	4	8	11	203	508	967	1,426	1,961	2,534	3,070	3,452
Accumulated Reserve	14,144	0	4	12	23	226	734	1,701	3,127	5,088	7,622	10,692	14,144
ADIT- see page 17 1/	\$4,503	743	1,424	2,037	2,583	3,060	3,471	3,813	4,086	4,292	4,430	4,501	4,503
Net Plant	\$1,158,138	\$458	\$974	\$1,554	\$61,037	\$156,421	\$299,598	\$442,385	\$608,798	\$786,751	\$952,191	\$1,069,130	\$1,158,138
Ad Valorem Taxes	\$20,947	\$2	\$4	\$5	\$94	\$237	\$451	\$664	\$914	\$1,181	\$1,430	\$1,608	\$14,357

1/ Balances based on monthly proration methodology.

**GREAT PLAINS NATURAL GAS CO.
GUIC PLANT ADDITIONS - MAINS AND SERVICE
DEFERRED TAXES CALCULATION
GAS UTILITY - MINNESOTA
2016 ADDITIONS**

2016 Plant additions - 2018 GUIC

Month	Weighting for Projection	Mains			Service		
		Monthly Increments	Balance/ Increments	Balance	Monthly Increments	Balance/ Increments	Balance
December 2017	100.00%			\$30,429			\$24,574
January 2018	91.78%	\$817	\$750	31,179	\$604	\$554	25,128
February	84.11%	817	687	31,866	604	508	25,636
March	75.62%	817	618	32,484	604	457	26,093
April	67.40%	817	551	33,035	604	407	26,500
May	58.90%	817	481	33,516	604	356	26,856
June	50.68%	817	414	33,930	604	306	27,162
July	42.19%	817	345	34,275	604	255	27,417
August	33.70%	817	275	34,550	604	204	27,621
September	25.48%	817	208	34,758	604	154	27,775
October	16.99%	817	139	34,897	604	103	27,878
November	8.77%	817	72	34,969	604	53	27,931
December	0.27%	819	2	34,971	607	2	27,933
Total		9,806	4,542		7,251	3,359	

Mains	
<u>2018 GUIC</u>	
Year end Plant Bal.:	\$956,526
Tax Depreciation Rate:	6.6770%
	63,867
Book Depreciation:	29,748
Remainder:	34,119
Income Tax Rate:	28.7420%
Deferred Income Tax:	\$9,806
Monthly Increment:	\$817

Services	
<u>2018 GUIC</u>	
Year end Plant Bal.:	\$883,018
Tax Depreciation Rate:	6.6770%
	58,959
Book Depreciation:	33,732
Remainder:	25,227
Income Tax Rate:	28.7420%
Deferred Income Tax:	\$7,251
Monthly Increment:	\$604

2016 Plant additions - 2019 GUIC

Month	Weighting for Projection	Mains			Service		
		Monthly Increments	Balance/ Increments	Balance	Monthly Increments	Balance/ Increments	Balance
December 2018	100.00%			\$40,235			\$31,825
January 2019	91.78%	\$703	\$645	40,880	\$499	\$458	32,283
February	84.11%	703	591	41,471	499	420	32,703
March	75.62%	703	532	42,003	499	377	33,080
April	67.40%	703	474	42,477	499	336	33,416
May	58.90%	703	414	42,891	499	294	33,710
June	50.68%	703	356	43,247	499	253	33,963
July	42.19%	703	297	43,544	499	211	34,174
August	33.70%	703	237	43,781	499	168	34,342
September	25.48%	703	179	43,960	499	127	34,469
October	16.99%	703	119	44,079	499	85	34,554
November	8.77%	703	62	44,141	499	44	34,598
December	0.27%	699	2	44,143	493	1	34,599
Total		8,432	3,908		5,982	2,774	

Mains	
<u>2019 GUIC</u>	
Year end Plant Bal.:	\$956,526
Tax Depreciation Rate:	6.1770%
	59,085
Book Depreciation:	29,748
Remainder:	29,337
Income Tax Rate:	28.7420%
Deferred Income Tax:	\$8,432
Monthly Increment:	\$703

Services	
<u>2019 GUIC</u>	
Year end Plant Bal.:	\$883,018
Tax Depreciation Rate:	6.1770%
	54,544
Book Depreciation:	33,732
Remainder:	20,812
Income Tax Rate:	28.7420%
Deferred Income Tax:	\$5,982
Monthly Increment:	\$499

**GREAT PLAINS NATURAL GAS CO.
GUIC PLANT ADDITIONS - MAINS AND SERVICE
DEFERRED TAXES CALCULATION
GAS UTILITY - MINNESOTA
2017 ADDITIONS**

2017 Plant additions - 2018 GUIC

Month	Weighting for Projection	Mains			Service		
		Monthly Increments	Balance/ Increments	Balance	Monthly Increments	Balance/ Increments	Balance
December 2017	100.00%			\$24,005			\$15,949
January 2018	91.78%	\$1,684	\$1,546	25,551	\$950	\$872	16,821
February	84.11%	1,684	1,416	26,967	950	799	17,620
March	75.62%	1,684	1,273	28,240	950	718	18,338
April	67.40%	1,684	1,135	29,375	950	640	18,978
May	58.90%	1,684	992	30,367	950	560	19,538
June	50.68%	1,684	853	31,220	950	481	20,019
July	42.19%	1,684	710	31,930	950	401	20,420
August	33.70%	1,684	568	32,498	950	320	20,740
September	25.48%	1,684	429	32,927	950	242	20,982
October	16.99%	1,684	286	33,213	950	161	21,143
November	8.77%	1,684	148	33,361	950	83	21,226
December	0.27%	1,681	5	33,366	948	3	21,229
Total		20,205	9,361		11,398	5,280	

	<u>Mains</u> 2018 GUIC		<u>Service</u> 2018 GUIC
Year end Plant Bal.:	\$1,710,848	Year end Plant Bal.:	\$1,166,692
Tax Depreciation Rate:	7.2190%	Tax Depreciation Rate:	7.2190%
	123,506		84,223
Book Depreciation:	53,208	Book Depreciation:	44,568
Remainder:	70,298	Remainder:	39,655
Income Tax Rate:	28.7420%	Income Tax Rate:	28.7420%
Deferred Income Tax:	\$20,205	Deferred Income Tax:	\$11,398
Monthly Increment:	\$1,684	Monthly Increment:	\$950

2017 Plant additions - 2019 GUIC

Month	Weighting for Projection	Mains			Service		
		Monthly Increments	Balance/ Increments	Balance	Monthly Increments	Balance/ Increments	Balance
December 2017	100.00%			44,210			27,347
January 2018	91.78%	1,462	1,342	45,552	812	745	28,092
February	84.11%	1,462	1,230	46,782	812	683	28,775
March	75.62%	1,462	1,106	47,888	812	614	29,389
April	67.40%	1,462	985	48,873	812	547	29,936
May	58.90%	1,462	861	49,734	812	478	30,414
June	50.68%	1,462	741	50,475	812	412	30,826
July	42.19%	1,462	617	51,092	812	343	31,169
August	33.70%	1,462	493	51,585	812	274	31,443
September	25.48%	1,462	373	51,958	812	207	31,650
October	16.99%	1,462	248	52,206	812	138	31,788
November	8.77%	1,462	128	52,334	812	71	31,859
December	0.27%	1,458	4	52,338	815	2	31,861
Total		17,540	8,128		9,747	4,514	

	<u>Mains</u> 2019 GUIC		<u>Service</u> 2019 GUIC
Year end Plant Bal.:	\$1,710,848	Year end Plant Bal.:	\$1,166,692
Tax Depreciation Rate:	6.6770%	Tax Depreciation Rate:	6.6770%
	114,233		77,900
Book Depreciation:	53,208	Book Depreciation:	43,988
Remainder:	61,025	Remainder:	33,912
Income Tax Rate:	28.7420%	Income Tax Rate:	28.7420%
Deferred Income Tax:	17,540	Deferred Income Tax:	9,747
Monthly Increment:	1,462	Monthly Increment:	812

**GREAT PLAINS NATURAL GAS CO.
GUIC PLANT ADDITIONS - MAINS AND SERVICE
DEFERRED TAXES CALCULATION
GAS UTILITY - MINNESOTA
2018 ADDITIONS**

2018 Plant additions - 2018 GUIC

Month	Weighting for Projection	Mains			Service		
		Monthly Increments	Balance/ Increments	Balance	Monthly Increments	Balance/ Increments	Balance
December 2017	100.00%			\$0			\$0
January 2018	91.78%	\$811	\$744	744	\$480	\$441	441
February	84.11%	811	682	1,426	480	404	845
March	75.62%	811	613	2,039	480	363	1,208
April	67.40%	811	547	2,586	480	324	1,532
May	58.90%	811	478	3,064	480	283	1,815
June	50.68%	811	411	3,475	480	243	2,058
July	42.19%	811	342	3,817	480	203	2,261
August	33.70%	811	273	4,090	480	162	2,423
September	25.48%	811	207	4,297	480	122	2,545
October	16.99%	811	138	4,435	480	82	2,627
November	8.77%	811	71	4,506	480	42	2,669
December	0.27%	813	2	4,508	482	1	2,670
Total		9,734	4,508		5,762	2,670	

	<u>Mains</u> 2018 GUIC		<u>Service</u> 2018 GUIC
Year end Plant Bal.:	\$1,276,861	Year end Plant Bal.:	\$810,197
Tax Depreciation Rate:	3.7500%	Tax Depreciation Rate:	3.7500%
	47,882		30,382
Book Depreciation:	14,016	Book Depreciation:	10,333
Remainder:	33,866	Remainder:	20,049
Income Tax Rate:	28.7420%	Income Tax Rate:	28.7420%
Deferred Income Tax:	\$9,734	Deferred Income Tax:	\$5,762
Monthly Increment:	\$811	Monthly Increment:	\$480

2018 Plant additions - 2019 GUIC

Month	Weighting for Projection	Mains			Service		
		Monthly Increments	Balance/ Increments	Balance	Monthly Increments	Balance/ Increments	Balance
December 2017	100.00%			\$9,734			\$5,762
January 2018	91.78%	\$1,257	\$1,154	10,888	\$660	\$606	6,368
February	84.11%	1,257	1,057	11,945	660	555	6,923
March	75.62%	1,257	951	12,896	660	499	7,422
April	67.40%	1,257	847	13,743	660	445	7,867
May	58.90%	1,257	740	14,483	660	389	8,256
June	50.68%	1,257	637	15,120	660	334	8,590
July	42.19%	1,257	530	15,650	660	278	8,868
August	33.70%	1,257	424	16,074	660	222	9,090
September	25.48%	1,257	320	16,394	660	168	9,258
October	16.99%	1,257	214	16,608	660	112	9,370
November	8.77%	1,257	110	16,718	660	58	9,428
December	0.27%	1,254	3	16,721	656	2	9,430
Total		15,081	6,987		7,916	3,668	

	<u>Mains</u> 2019 GUIC		<u>Service</u> 2019 GUIC
Year end Plant Bal.:	\$1,276,861	Year end Plant Bal.:	\$810,197
Tax Depreciation Rate:	7.2190%	Tax Depreciation Rate:	7.2190%
	92,177		58,488
Book Depreciation:	39,708	Book Depreciation:	30,948
Remainder:	52,469	Remainder:	27,540
Income Tax Rate:	28.7420%	Income Tax Rate:	28.7420%
Deferred Income Tax:	\$15,081	Deferred Income Tax:	\$7,916
Monthly Increment:	\$1,257	Monthly Increment:	\$660

GREAT PLAINS NATURAL GAS CO.
GUIC PLANT ADDITIONS - MAINS AND SERVICE
DEFERRED TAXES CALCULATION
GAS UTILITY - MINNESOTA
PROJECTED 2019 ADDITIONS

2019 Plant additions

Month	Weighting for Projection	Monthly Increments	Balance/ Increments	Balance	Monthly Increments	Balance/ Increments	Balance
December 2018	100.00%			\$0			\$0
January 2019	91.78%	\$933	\$856	856	\$810	\$743	743
February	84.11%	933	785	1,641	810	681	1,424
March	75.62%	933	706	2,347	810	613	2,037
April	67.40%	933	629	2,976	810	546	2,583
May	58.90%	933	550	3,526	810	477	3,060
June	50.68%	933	473	3,999	810	411	3,471
July	42.19%	933	394	4,393	810	342	3,813
August	33.70%	933	314	4,707	810	273	4,086
September	25.48%	933	238	4,945	810	206	4,292
October	16.99%	933	159	5,104	810	138	4,430
November	8.77%	933	82	5,186	810	71	4,501
December	0.27%	929	3	5,189	804	2	4,503
Total		\$11,192	\$5,189		\$9,714	\$4,503	

	2019 Yr 1		2019 Yr 1
Year end Plant Bal.:	\$1,412,140	Year end Plant Bal.:	\$1,176,785
Tax Depreciation Rate:	3.7500%	Tax Depreciation Rate:	3.7500%
	52,955		44,129
Book Depreciation:	14,016	Book Depreciation:	10,333
Remainder:	38,939	Remainder:	33,796
Income Tax Rate:	28.74%	Income Tax Rate:	28.74%
Deferred Income Tax:	\$11,192	Deferred Income Tax:	\$9,714
Monthly Increment:	\$933	Monthly Increment:	\$810

GREAT PLAINS NATURAL GAS CO.
AVERAGE UTILITY CAPITAL STRUCTURE
AUTHORIZED - MINNESOTA

	<u>Balance</u>	<u>Ratio</u>	<u>Cost</u>	<u>Required Return</u>	
<u>Authorized 2016</u> 1/					
Long Term Debt	\$555,451,153	41.712%	5.492%	2.291%	
Short Term Debt	87,302,622	6.556%	1.610%	0.106%	2.397%
Preferred Stock	15,258,600	1.146%	4.562%	0.052%	
Common Equity	673,616,423	50.586%	9.060%	4.583%	
Total	<u>\$1,331,628,798</u>	<u>100.000%</u>		<u>7.032%</u>	

1/ Authorized in Docket No. G004/GR-15-879.

**GREAT PLAINS NATURAL GAS CO.
ALLOCATION OF GUIC BASED ON
AUTHORIZED REVENUE ALLOCATION
PROJECTED 2019**

	<u>Authorized 1/ Rev. Alloc</u>	<u>%</u>	<u>2017 and 2018 GUIC Rev. Req.</u>	<u>GUIC Recovery</u>	<u>GUIC Net Under-Recovery</u>	<u>2019 GUIC Projected Rev. Req.</u>	<u>GUIC Necessary Recovery</u>	<u>Projected Dk 2/</u>	<u>Proposed Per Dk</u>
Residential									
North	\$2,184,051	24.2038%	\$284,735			\$259,397			
South	2,126,981	23.5714%	277,297			252,618			
Total	<u>4,311,032</u>	<u>47.7752%</u>	<u>\$562,032</u>	<u>(\$452,238)</u>	<u>\$109,794</u>	<u>\$512,015</u>	<u>\$621,809</u>	<u>1,473,058</u>	<u>\$0.4221</u>
Firm General									
North	1,245,547	13.8032%	\$162,383			\$147,931			
South	1,494,511	16.5623%	194,841			177,501			
Total	<u>2,740,058</u>	<u>30.3655%</u>	<u>\$357,224</u>	<u>(\$291,894)</u>	<u>\$65,330</u>	<u>\$325,432</u>	<u>\$390,762</u>	<u>1,258,819</u>	<u>0.3104</u>
Small IT Sales									
North	540,099	5.9854%	\$70,413			\$64,146			
South	549,521	6.0898%	71,641			65,265			
Total	<u>1,089,620</u>	<u>12.0752%</u>	<u>\$142,054</u>	<u>(\$114,188)</u>	<u>\$27,866</u>	<u>\$129,411</u>	<u>\$157,277</u>	<u>762,424</u>	<u>0.2063</u>
Large IT Sales									
North	344,558	3.8184%	\$44,920			\$40,922			
South	27,707	0.3071%	3,613			3,291			
Total	<u>372,265</u>	<u>4.1255%</u>	<u>\$48,533</u>	<u>(\$44,660)</u>	<u>\$3,873</u>	<u>\$44,213</u>	<u>\$48,086</u>	<u>285,776</u>	<u>0.1683</u>
Small IT Transportation									
North	49,538	0.5490%	\$6,459			\$5,884			
South	32,152	0.3563%	4,192			3,819			
Total	<u>81,690</u>	<u>0.9053%</u>	<u>\$10,651</u>	<u>(\$13,118)</u>	<u>(\$2,467)</u>	<u>\$9,703</u>	<u>\$7,236</u>	<u>98,986</u>	<u>0.0731</u>
Large IT Transportation									
North Flex	745,730		\$0			\$0			
North & South	428,919	4.7533%	55,918			50,942		784,983	0.0601
South Flex	118,913		0			0			
Total	<u>1,293,562</u>	<u>4.7533%</u>	<u>55,918</u>	<u>(59,709)</u>	<u>(\$3,791)</u>	<u>50,942</u>	<u>\$47,151</u>	<u>784,983</u>	<u>0.0601</u>
Total	<u>\$9,888,227</u>	<u>100.0000%</u>	<u>\$1,176,412</u>	<u>(\$975,807)</u>	<u>\$200,605</u>	<u>\$1,071,716</u>	<u>\$1,272,321</u>	<u>4,664,046</u>	<u>\$0.2728</u>
			<u>3/</u>	<u>3/</u>	<u>3/</u>	<u>3/</u>	<u>3/</u>		
Excluding Flex	\$9,023,584								

1/ Docket No. G004/GR-15-879, Final Order Compliance Filing, Exhibit 3b, p. 1.
2/ Projected dk for the period October 2019-September 2020 for non-flex classes.
3/ Exhibit D, page 1.

**GREAT PLAINS NATURAL GAS CO.
GAS UTILITY INFRASTRUCTURE COST ADJUSTMENT
INFORMATION REQUIRED PURSUANT TO
MINN. STAT. §216b.1635 SUBP. 4**

(2)(vii) The magnitude of GUIC in relation to the gas utility's base revenue as approved by the commission in the gas utility's most recent general rate case, exclusive of gas purchase costs and transportation charges

Authorized margin - Docket no. G004/GR-15-879	\$9,888,227
GUIC Revenue Requirement	\$1,079,318
% of margin	10.9%

(2)(viii) The magnitude of GUIC in relation to the gas utility's capital expenditures since its most recent general rate case

	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>
Capital Expenditures	1,839,544	2,877,540	2,087,058	2,588,925
Capital expenditures - rate case 1/	3,844,559			
% of rate case expenditures	47.8%	74.8%	54.3%	67.3%

1/ Docket No. G004/GR-15-879.

(2)(ix) The amount of time since the utility last filed a general rate case and the utility's reasons for seeking recovery outside of a general rate case.

The last general rate case was filed September 30, 2015 in Docket No. G004/GR-15-879 using a projected 2016 test period. The final order was issued September 6, 2016 with final rates effective January 1, 2017.

The capital investments included in this filing were not reflected in the most recent rate case and therefore are eligible for recovery under the statute. Great Plains will delay filing a rate case and the costs associated with filing a general rate case through the use of a GUIC tariff and adjustment, especially when the amount sought, while critical to Great Plains, is not a significant increase to customers.

**Gas Utility Infrastructure Cost Adjustment
Rate Effective October 1, 2019**

On April 15, 2019, Great Plains Natural Gas Co. (Great Plains) filed with the Minnesota Public Service Commission (MNPUC) to update its Gas Utility Infrastructure Cost (GUIC) tariff, which allows Great Plains to recover the cost of infrastructure investments mandated by federal and state agencies associated with Great Plains' pipeline integrity and safety programs such as the cost of assessments, modifications and replacement of natural gas facilities that are not included in the base rate. The GUIC was initially approved by the MNPUC on October 6, 2017.

The per dekatherm adjustment charge approved in the GUIC filing is shown by customer class in the table below. The GUIC is reflected as a separate line item on your monthly gas service statement and will be effective with service rendered on or after October 1, 2019.

	<u>Rate per Dekatherm (Dk)</u>
<u>Sales</u>	
Residential	\$0.4221
Firm General	\$0.3104
Small Interruptible	\$0.2063
Large Interruptible	\$0.1683
<u>Transportation (excluding flexible rate contracts)</u>	
Small Interruptible	\$0.0731
Large Interruptible	\$0.0601

Questions? Contact us at 1-877-267-4764.