

January 20, 2021

PUBLIC DOCUMENT

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

RE: PUBLIC Supplemental Comments of the Minnesota Department of Commerce, Division of Energy Resources
Docket No. G-022, G-008/C-20-795

Dear Mr. Seuffert:

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

Formal Complaint and Petition for Relief by Greater Minnesota Gas, Inc. Against CenterPoint Energy Resources Corp. d/b/a/ CenterPoint Energy Minnesota Gas.

On October 1, 2020, the Minnesota Public Utilities Commission (Commission) issued a *Notice of Comment Period* seeking comment on whether the Commission has jurisdiction over the subject matter, whether it is in the public interest for the Commission to investigate, and if so, what procedures should be used, and whether the principles set forth in the Commission's September 19, 2018 Order in Docket G999/CI-17-499 (17-499 Order) have been met. Initial comments were filed on November 6, 2020; reply comments were due November 16, 2020.

The Department recommended that the Commission continue to investigate the complaint while narrowing its focus to three customers that are disputed in its Comments and Reply Comments. The Department prepared these Supplemental Comments to provide the Commission with additional information on the status of those three customers relative to the principles identified in the 17-499 Order.

The Department recommends the Commission dismiss the complaint after completing this review.

The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ JOHN KUNDERT
Financial Analyst

MS/ar
Attachment

Before the Minnesota Public Utilities Commission

PUBLIC Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. G-022, G-008/C-20-795

I. PROCEDURAL HISTORY

On October 19, 2020, Greater Minnesota Gas, Inc. (GMG) submitted to the Minnesota Public Utilities Commission (Commission) a formal complaint (Complaint) against CenterPoint Energy Minnesota Gas (CenterPoint). The Complaint alleges that CenterPoint plans to extend natural gas service to several premises that are currently or were receiving natural gas service from GMG, and one new commercial premise (TriFecta Truck Stop). GMG alleges that CenterPoint's actions are inconsistent with the provisions of Minn. Stat. § 216B.01 and the Commission Order in Docket No G999/CI-17-499 (17-499 Order) regarding unnecessary duplication of facilities to serve another utility's existing customers.¹ GMG also posits that it has the exclusive right to provide natural gas service to all the premises that it is currently serving or has formerly served.

On October 20, 2020 CenterPoint filed a letter responding to GMG's Complaint. CenterPoint concluded that current Minnesota Statutes and the Commission's 17-499 Order allows CenterPoint to serve the new commercial premise (TriFecta Truck Stop). CenterPoint indicated that a decision as to which utility should serve 3625 Hoffman Road, one of the premises that GMG has served in the past, is not yet ripe, since neither utility has received an application for service and no facilities to serve the customer have been constructed since GMG cut and capped the existing service line in October 2020.² Finally, CenterPoint indicated that it will cease construction associated with extending service to existing buildings along 192nd Lane that are currently being served by GMG (buildings owned by Web Construction and a residence). CenterPoint asked that GMG withdraw its Complaint.

On October 23, 2020, the Commission issued a *Notice of Comment Period*. The Notice provided for an initial comment period that closed on November 6, 2020 as well as a Reply Comment period that closes November 16, 2020.

On November 5, 2020 the Department filed comments recommending that the Commission investigate the Complaint and be guided by the framework provided by the Commission's 17-499 Order. The Department was particularly interested in the location of CenterPoint's existing facilities in the disputed area and the potential for the duplication of facilities that might result from either utility serving the customers in question.

¹ ORDER ADOPTING STANDARDS GOVERNING COMPETITION AMONG NATURAL GAS UTILITIES issued September 19, 2018 in Docket No. G999/CI-17-499.

² See Attachment 10.

On November 6, 2020 CenterPoint filed its comments and recommended that the Commission dismiss the Complaint. CenterPoint also included a significant amount of information in its comments on the location of its existing facilities in the affected area. CenterPoint designated all of this information concerning the location of its existing facilities as trade secret.

Also, on November 6, GMG filed its comments and recommended that the Commission investigate and use the framework identified in the Commission's 17-499 Order.

On November 16:

- the Department filed reply comments recommending that the Commission continue to investigate the complaint while narrowing its focus to three proposed facilities that are disputed.
- GMG filed Reply Comments requesting that the Commission continue to investigate this matter using an informal process to develop the record.
- CenterPoint Energy submitted that further investigation in this matter is unnecessary under the framework of the 17-499 Order and would not serve the public interest.

II. ANALYSIS

As noted in the Department's November 5, 2020 comments, the Commission's 17-499 Order delineated an approach for determining whether a utility is duplicating a second utility's facilities.³

- Determining whether a utility is duplicating the facilities of another will be based on the nature, size and physical proximity of the new facilities relative to the other utility's existing infrastructure, as well as the extent to which the existing facilities need to be expanded to serve the customer.
- To establish that its duplication of existing facilities is necessary, a utility must show that (a) customer cannot obtain the natural gas service they need from the utility with the existing facilities; or (b) such duplication furthers the public interest based on (i) the needs of the customers who would be served by the utility extending service; (ii) the incremental capital expenditures associated with duplicating the existing facilities compared to any incremental capital expenditures needed to expand the existing facilities to serve the customers in question; (iii) any safety concerns associated with constructing and operating duplicative facilities; and (v) any other factors showing that the duplication would advance the public interest in adequate, reliable and economical access to natural gas service.

The Department reviewed the 17-499 Order's requirements relative to the three affected customers respectively.

³ ORDER at page 11.

1. *Web Construction – 192nd Lane*

a. Duplication of Facilities Overview

GMG requested that the Commission issue “an order declaring that, under the circumstances, GMG has the exclusive right to provide natural gas service to the customers on 192nd Lane, Mankato.”⁴ GMG explained in the Complaint that it served three meters in the Web Construction “complex” located on 192nd Lane in Mankato.

- A construction “shop” at 56644 192nd Lane:
- A second construction shop at 56644 192nd Lane, and
- A residence at 56698 192nd Lane, Mankato.

In Exhibit A to the Complaint GMG also included a locate request for natural gas service that would be provided to a new structure, another “shop,” at 56698 192nd Lane.^{5, 6} GMG did not contest the provision of natural gas service to the new structure specifically in the Complaint. However, its request regarding the Commission issuing “an order providing for an exclusive right to provide natural gas service” appears to include this new facility as well.

CenterPoint stated in its Comments dated October 20, 2020 at page 3: “Therefore, CenterPoint Energy will halt construction to the accounts served by GMG on 192nd Lane. . .” [Emphasis added.]

CenterPoint’s decision results in only one meter/premise on 192nd Lane now being disputed, the new structure (shop) under construction at 56698 192nd Lane. GMG also referenced this meter/premise as being disputed in its Reply Comments dated November 16, 2020 at page 3.

GMG provided information in the Complaint that identified its facilities on 192nd Lane in detail. GMG also stated in the Complaint that it had been serving customers on 192nd Lane since 2003.

CenterPoint also provided information regarding its existing facilities in the area in Trade Secret Exhibit E of the Company’s November 6, 2020 comments.⁷ Information included in **TRADE SECRET** Exhibit E of those November 6, 2020 Comments suggests CenterPoint had installed distribution main on 192nd Lane as early as 1974 and had replaced that main and extended its natural gas distribution network on 568th Ave in **[TRADE SECRET DATA HAS BEEN EXCISED]**. CenterPoint is also currently serving a customer at **[TRADE SECRET DATA HAS BEEN EXCISED]**. The information CenterPoint provided suggests that any “duplication of facilities” had already occurred before GMG filed the instant Complaint as CenterPoint had facilities on 192nd Lane and was serving a customer there prior to GMG’s installation of facilities in 2003. Hence, GMG’s position that it is the sole purveyor of natural gas service on 192nd Lane is not consistent with the information provided.

⁴ GMG Complaint dated October 11, 2020 at page 11.

⁵ This new shop represents a fourth meter in the Web Construction complex.

⁶ See Attachment 1 for a copy of this map.

⁷ **TRADE SECRET** Attachment 2 contains a copy this map.

Regarding the Commission's requirement that the duplication of facilities should consider "the nature, size and physical proximity of the new facilities relative to the other utility's existing infrastructure, as well as the extent to which the existing facilities need to be expanded to serve the customer" the Department asked in information request no. 4 that CenterPoint provide any "analysis that supports the economic expansion of CenterPoint's distribution system to this customer."

In its response CenterPoint provided the economic feasibility analysis it developed as part of its analysis regarding the extension of service to the new structure (shop) under construction at 56698 192nd Lane. That analysis identified the installation of **[TRADE SECRET DATA HAS BEEN EXCISED]**. CenterPoint's cost estimate for the entire installation was **[TRADE SECRET DATA HAS BEEN EXCISED]**. Given CenterPoint's expected annual revenue provided by the new customer and the calculation for determining the project economic feasibility included in CenterPoint's tariff, the customer was **[TRADE SECRET DATA HAS BEEN EXCISED]** an additional contribution in aid of construction (CIAC).^{8,9}

The Department asked the same question to GMG in Department information request no. 1. GMG replied:

Since GMG was not approached about the facility, GMG does not have such an analysis. However, since GMG does have main facilities directly in from of the Web Construction and Williams parcels, to the extent that the facility is being built near the other Web/Williams buildings, GMG would not have to incur any cost to serve the facility other than a standard service installation.¹⁰

It appears given the information provided that either GMG or CenterPoint can serve the new facility at 56698 192nd Lane cost effectively.

b. Public Interest Considerations

The second bullet point in the Commission's 17-499 Order focuses more on this topic. The Commission recognized that if the duplication of facilities would advance the public interest in adequate, reliable and economical access to natural gas service, then it might make sense to do so.

The Department developed a bill comparison that compared the annual cost of gas service for the new Web Construction facility for the historical time period from July 2019 through June 2020.¹¹ Assuming an identical level of usage, the customer's annual bill using CenterPoint was **[TRADE SECRET DATA HAS BEEN EXCISED]**. The customer's annual bill using GMG would have been **[TRADE SECRET DATA HAS BEEN EXCISED]**. This annual difference of **[TRADE SECRET DATA HAS BEEN EXCISED]** between the two

⁸ **TRADE SECRET** Attachment 3 contains CenterPoint feasibility analysis for this customer.

⁹ CenterPoint's process for calculating the economic feasibility of extending service is found in Section VI, Third Revised Pages 4 through 7. The Department has included a copy of that section of CenterPoint's tariff as Attachment 4.

¹⁰ Attachment 5 contains a copy of GMG's response to Department information request no. 1.

¹¹ The Department selected this historical time period as an example to remove any risk associated with forecasted prices.

companies equals a **[TRADE SECRET DATA HAS BEEN EXCISED]** percent difference in the annual bills for the time period in question.¹² That represents a strong incentive for a customer to take service from CenterPoint if the two utilities are competing for the same small commercial customers. That was the situation here as well.

GMG did cite a safety concern relative to CenterPoint serving the 4 properties identified on 192nd Lane in its Complaint at page 7 noting that “if there is a gas leak in the area, it will be difficult to determine whether that leak is coming from a pipeline owned by GMG or CenterPoint”. The Department did not pursue this concern given that CenterPoint and GMG both serve customers on 192nd Lane. Hence, that risk is not incremental, rather it is pre-existing. If the Commission decides to pursue that question, it may want to ask GMG to provide additional information on this issue.

Given the balance of the information provided, the Department concludes that both utilities could serve the customer cost-effectively and the customer exercised his/her ability to choose the natural gas service provider that could provide service most economically from the customer’s perspective. The Department recommends that Commission dismiss this component of GMG’s Complaint.

2. Customer Premise at 3625 Hoffman Road, Mankato

GMG also requested that the Commission issue “an order declaring that, under the circumstances, GMG has the exclusive right to provide natural gas service . . . to the property located at 3625 Hoffman Road, Mankato.”¹³

a. Duplication of Facilities Overview

GMG identified its facilities that served 3625 Hoffman Road in detail in Exhibit E of its Complaint.¹⁴ GMG stated in the Complaint that it had been serving this residential customer since 2001. GMG also stated that a new owner bought the property in early 2020. This same new owner notified GMG that it had plans to build a new memory care facility on that parcel at some point. In early October 2019 that same new owner requested that GMG cut and cap the existing gas line, thereby terminating GMG’s service to the property and creating a situation in which no natural gas local distribution company is currently serving the property.¹⁵

¹² **TRADE SECRET** Attachment 6 contains this bill comparison.

¹³ GMG Complaint dated October 11, 2020 at page 11.

¹⁴ Attachment 7 contains a copy of this map.

¹⁵ *Id* at page 6.

GMG states in the Complaint:

“GMG’s existing pipeline and associated facilities are sufficient to meet – and have met – the natural gas demands of its existing customers. GMG expected that it would continue to provide natural gas to the existing customers, based on having provided natural gas to them for many years.”

CenterPoint also provided information regarding its existing facilities in the area in Trade Secret Exhibits C and D of the Company’s November 6, 2020 comments. Information included in **TRADE SECRET** Exhibit C of those November 6, 2020 Comments suggests CenterPoint had installed distribution main on that section of Hoffman Road in **[TRADE SECRET DATA HAS BEEN EXCISED]**.¹⁶ The information CenterPoint provided suggests that any “duplication of facilities” had already occurred several years before GMG filed the instant Complaint. Thus, GMG’s position that it is the sole purveyor of natural gas service on this section of Hoffman Road is not consistent with the information provided.

Regarding the Commission’s requirement that the duplication of facilities should consider “the nature, size and physical proximity of the new facilities relative to the other utility’s existing infrastructure, as well as the extent to which the existing facilities need to be expanded to serve the customer” the Department asked in information request no. 5 (b) that CenterPoint provide any “analysis that supports the economic expansion of CenterPoint’s distribution system to this customer.”

In its response CenterPoint stated: “No analysis has been performed to support expansion of CenterPoint Energy’s system to this potential customer.”

In Department information request no. 5 (a) the Department asked that CenterPoint provide “copy of any signed service agreement between the owners of this new facility and CenterPoint. If a service agreement has not been signed yet, when does CenterPoint anticipate that one will be signed?”

In its response CenterPoint stated: “No service agreement has been signed between the owners of the new facility and CenterPoint Energy. CenterPoint Energy does not have information on when if ever a service agreement will be signed.”¹⁷

In Department information request no. 5 (c) the Department asked that CenterPoint to provide “any and all work order(s) associated with the construction of the distribution facilities necessary to serve this customer.”

In its response CenterPoint stated: “There are no work orders associated with expansion of service to this potential customer.”

¹⁶ **TRADE SECRET** Attachment 8 contains a copy of this map.

¹⁷ Attachment 9 contains a copy of CenterPoint’s response to Department information request no. 5.

In information request no. 2(a) the Department asked GMG to “provide the analysis that supports the economic expansion of GMG’s distribution system to this customer. GMG responded:

Since GMG already provides service to the current owner (which will also own the memory care building, at the residence to the property, GMG does not need to expand its distribution system to serve the customer. Based on the facility design, a slight change to the service line and meter set and location may be required, but GMG would not incur any expenses beyond that.

In information request no. 2(b) the Department asked GMG about the status. GMG responded:

GMG has cut and capped the line at the customer’s request. GMG believes that the existing house may have already been demolished or that demolition is in progress to prepare for imminent construction of the owner/customer’s replacement building on the same site.”¹⁸

Thus, the owners at 3625 Hoffman Road do not have natural gas service currently. This would allow them to be classified as a new customer for either GMG or CenterPoint. And given the potential change in the size of the facility and potential load, this seems appropriate. This new customer will then be able to exercise customer choice in selecting their new natural gas service provided and GMG and CenterPoint will have the opportunity to compete for that facility’s business if it is built.

Thus, the Department concludes that given the information provided that either GMG or CenterPoint can serve the new potential memory-care facility at 3526 Hoffman Road without significant duplication of facilities.

b. Public Interest Considerations

In the 17-499 Order, the Commission recognized that if the duplication of facilities would advance the public interest in adequate, reliable and economical access to natural gas service, then it might make sense to do so. The lack of information regarding this potential customer’s load and choice of service natural gas provider make this review somewhat more “hypothetical”. That said, the customer will have the choice between two natural gas service providers and will be able to be select the service provider that provides the best bundle of natural gas related services that customer requires.

The Department concludes that both utilities could serve the potential customer cost-effectively and the potential customer should have the ability to choose the natural gas service provider that can provide service the most attractive bundle of services from the customer’s perspective. The Department recommends that Commission dismiss this component of GMG’s Complaint.

¹⁸ Attachment 10 contains a copy of GMG’s response to Department information request no. 2.

3. *Trifecta Truck Stop 3010 Adams St. Mankato*

GMG did not request a specific Commission action regarding this customer in the Complaint. Rather, GMG questioned the “legitimacy of the main extensions” CenterPoint might be proposing to serve the Trifecta Truck Stop (Truckstop) in its Reply Comments at page 4 and asked that the Department review CenterPoint’s proposal to serve this customer. GMG also noted that it had existing facilities in close proximity to the Truckstop and by extension, its cost of providing service would be lower than CenterPoint’s.

a. Duplication of Facilities Overview

GMG provided information in the Complaint that identified its facilities in proximity to the Truckstop in detail in Exhibit D of the Complaint.¹⁹

CenterPoint also provided information regarding its existing facilities in the area in **TRADE SECRET** Exhibits A and B of the Company’s November 6, 2020 comments. Information included in **TRADE SECRET** Exhibit A of those November 6, 2020 Comments suggests CenterPoint had installed distribution main on Adams Street in **[TRADE SECRET DATA HAS BEEN EXCISED]**.²⁰ While CenterPoint’s facilities were at some distance from the Truckstop’s location, it did have facilities in the area.

Regarding the Commission’s requirement that the duplication of facilities should consider “the nature, size and physical proximity of the new facilities relative to the other utility’s existing infrastructure, as well as the extent to which the existing facilities need to be expanded to serve the customer” the Department asked in information request no. 6 that CenterPoint provide any “analysis that supports the economic expansion of CenterPoint’s distribution system to this customer.”

In its response CenterPoint provided the economic feasibility analysis it developed as part of its analysis regarding the extension of service to the Truckstop. That analysis identified the installation of **[TRADE SECRET DATA HAS BEEN EXCISED]**. CenterPoint’s cost estimate for the entire installation was **[TRADE SECRET DATA HAS BEEN EXCISED]**. Given CenterPoint’s expected annual revenue provided by the new customer and the calculation for determining the project economic feasibility included in CenterPoint’s tariff, the customer was **[TRADE SECRET DATA HAS BEEN EXCISED]** an additional contribution in aid of construction (CIAC).^{21,22}

The Department asked the same question to GMG in Department information request no. 3.

¹⁹ Attachment 11 contains a copy of this map.

²⁰ **TRADE SECRET** Attachment 12 contains a copy of this map.

²¹ **TRADE SECRET** Attachment 13 contains CenterPoint feasibility analysis for this customer.

²² CenterPoint’s process for calculating the economic feasibility of extending service is found in Section VI, Third Revised Pages 4 through 7. The Department has included a copy of that section of CenterPoint’s tariff as Attachment 4.

GMG replied:

GMG has existing main across the street from the customer; hence, GMG does not need to expand its distribution system to serve the customer. GMG would simply need to install a long-side served line to the customer. When Jerry Williams of Web Construction originally advised GMG that it would be selected to provide the natural gas service to the customer, GMG's readily available main was a large part of the customer's reasoning, as there would be no need to wait for or contribute cost to a main extension.²³

It appears given the information provided that either GMG or CenterPoint can serve the Truckstop cost effectively from the utility's perspective.

b. Public Interest Considerations

The second bullet point in the Commission's 17-499 Order focuses more on this topic. In the second bullet point in the 17-499 Order, the Commission recognized that if the duplication of facilities would advance the public interest in adequate, reliable and economical access to natural gas service, then it might make sense to do so.

The Department developed an annual bill comparison that compared the cost of firm sales gas service for the Truckstop assuming the historical time period from July 2019 through June 2020. Assuming an identical level of usage, the customer's annual bill using CenterPoint was **[TRADE SECRET DATA HAS BEEN EXCISED]**. The customer's annual bill using GMG would have been **[TRADE SECRET DATA HAS BEEN EXCISED]**. This annual difference of **[TRADE SECRET DATA HAS BEEN EXCISED]** between the two companies equals a **[TRADE SECRET DATA HAS BEEN EXCISED]** percent difference in the annual bills for the time period in question.²⁴ That represents a strong incentive for a customer to take service from CenterPoint if the two utilities are competing for the same small firm commercial customer. That was the situation here as well.

Given the balance of the information provided, the Department concludes that both utilities could serve the customer cost-effectively and the customer exercised his/her ability to choose the natural gas service provider that could provide service most economically from the customer's perspective. The Department recommends that Commission dismiss this component of GMG's Complaint.

²³ A copy of GMG's response to Department information request no. 3 is included in Attachment 14.

²⁴ **TRADE SECRET** Attachment 15 contains this bill comparison.

4. *Summary*

The Department proposed the use of a cost-benefit analysis in Docket No. G999/CI-17-499 that considered the following perspectives:

- The competed-for customer,
- The ratepayers of the preferred utility, and
- The shareholders of the customer's preferred utility,
- The ratepayers of the non-preferred utility.
- The shareholders of the non-preferred utility,

The Department's bill comparison analysis identified significant financial benefits for the two customers that currently have service agreements with CenterPoint (Web Construction Shop at 56698 192nd Lane and the Trifecta Truck Stop) relative to taking that same service from GMG. The Department's review of CenterPoint's economic analysis for extending service to those same two customers determined that the extensions made to provide service to those customers were consistent with CenterPoint's tariff. Thus, the Department concludes that CenterPoint's other ratepayers were not financially harmed by the addition of those two new customers. CenterPoint's shareholders also benefited from the addition future income the two new customers will provide.

GMG's ratepayers did not benefit from the addition of those two new customers, nor did its shareholders.

III. **RECOMMENDATIONS**

The Department recommends that the Commission dismiss the Complaint. The Department's review determined that either GMG or CenterPoint could serve the two customers in question cost-effectively. Thus, no potential for duplication of facilities existed. Web Construction and the Trifecta Truck Stop exercised their respective right to choose which natural gas local distribution company should serve them consistent with Commission policy and the requirements included in the 17-499 Order.

The Department also concludes that the third customer identified in the Complaint at 3625 Hoffman Road, Mankato faces a similar situation and should be allowed to choose its natural gas service provider if construction at that site commences.

/ar

Gopher State One Call Locate Request

NEW
 Ticket Number: 202881935 Old Ticket:
 By: webusr9 Source: WEB
 Type: NORMAL Date: 10/14/2020 10:50 AM
 Send To: GRMNGS01 Sequence: 14

Company Information

MICHELS PIPELINE Type: CONTRACTOR
 14450 NORTHDALE
 ROGERS, MN 55374

Caller: TIM CARLSON Caller Phone: (763) 428-3554
 Contact: MIKE JAMES Contact Phone: (612) 363-6702
 Company Phone: (763) 428-3554 Company Fax:
 Company Email: tcarlson@michels.us

Work Information

State: MN Work Date: 10/16/2020 12:00 PM
 County: BLUE EARTH Done For: CENTERPOINT ENERGY
 Place: RAPIDAN TWP
 Street: 5669B 192ND LN
 Intersection: 568TH AVE
 Type of Work: GAS MAIN & SERVICES
 Explosives: No Tunnel/Bore: Yes
 Right of Way: Yes Duration: 3 WEEKS
 Area Marked: Yes

Remarks Information

THIS IS A NEW SHOP. MARK 25FT EACH SIDE OF FLAGGED ROUTE FROM EAST SIDE OF SHOP TO 192 LANE

Link To Map_LINK for GRMNGS01: <https://mn.itic.occinc.com/957R-72N-Q04-AA7>

Facility Operators

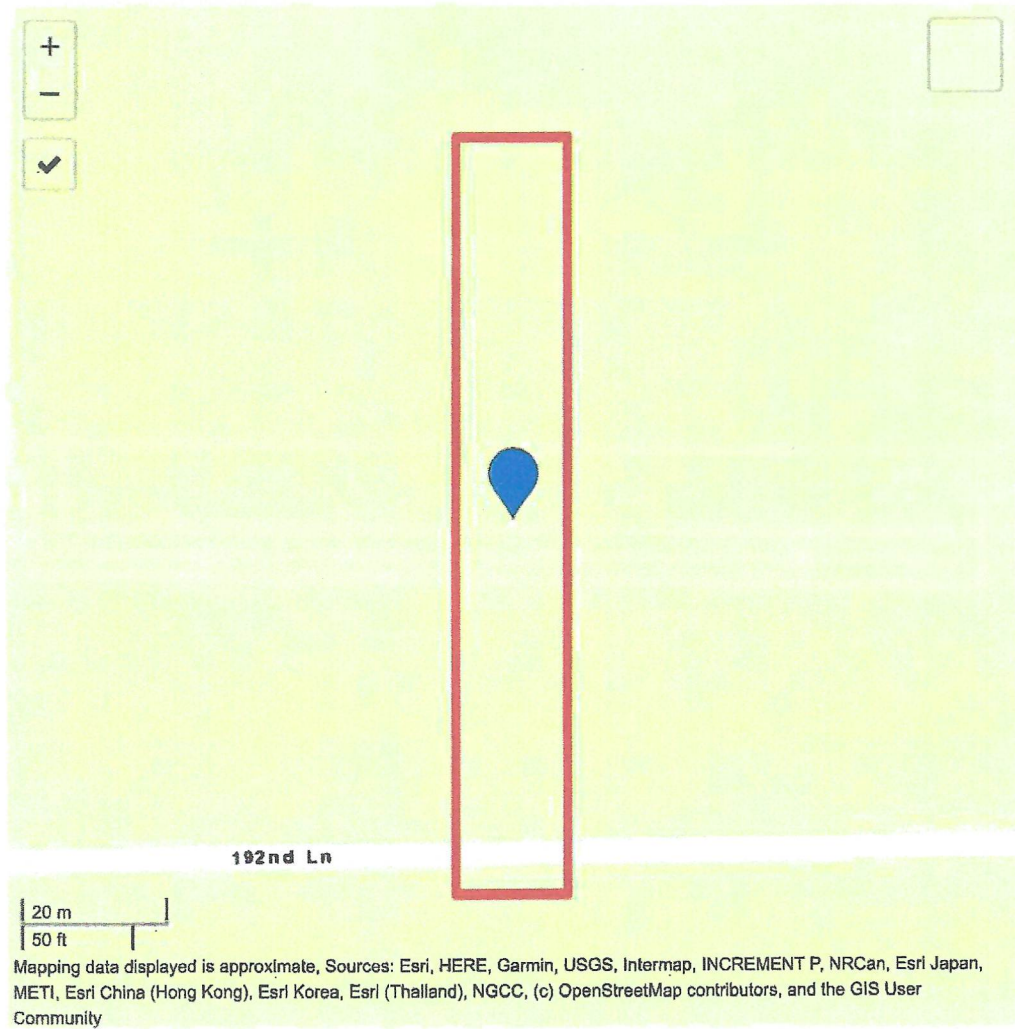
Code	Name	Phone Number
GRMNGS01	GREATER MINNESOTA GAS	(888) 931-3411
MDAMLD02	ENTERPRISE PRODUCTS OPERATING	(877) 243-2255
MINGAS04	CENTER POINT ENERGY	(608) 223-2014
MNKCTT01	CONSOLIDATED COMMUNICATIONS I	(800) 778-9140
NNGAS05	NORTHERN NATURAL GAS	(507) 728-8281
XCEL02	XCEL ENERGY	(800) 848-7558

Location

Number of Excavation Locations: 1
 Coordinates for each location:
 Loc 1 : NW Lat: 44.102093 Lon: -94.014998 SE Lat: 44.101186 Lon: -94.014808
 T 107N R 27W S 1 Q NE T 107N R 27W S 1 Q NW T 107N R 27W S 1 Q SE
 T 107N R 27W S 1 Q SW

Location Coordinates

Latitude	Longitude	Latitude	Longitude	Latitude	Longitude
Location 1					
(44.1012547,	-94.0148082)	(44.1011861,	-94.0148082)	(44.1011861,	-94.0149986)
(44.1020251,	-94.0149986)	(44.1020937,	-94.0149986)	(44.1020937,	-94.0148082)



Mapping data displayed is approximate. Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

6

[TRADE SECRET DATA HAS BEEN EXCISED]

Capital Costs

Main line installation costs

Line size and type:	Footage:	Directional bore? (Type 2 used most)	
2" Plastic	550		Total main cost:

Service line installation costs

Line size and type:	Footage:	Directional bore? (Type 2 used most)	
1 1/4" Plastic	250		
Total footage:	620		Total service line cost:

Meter installation costs

Meter type:	Number of sets:	Per-unit cost:	Max CFH @ 2#	
	250		400	Total meter cost:
				Total project costs:

Economic Feasibility Analysis

Expected Annual Consumption (Therms):

Delivery charge (per therm):

Customer charge (annual total):

Estimated Annual Margin

Cost of service factor:

Allowable investment

Tax Gross Up

Grossed Up Customer Contribution



4.00 GAS MAINS

CenterPoint Energy will install mains under the following guidelines and conditions:

4.01 Gas Main Design and Ownership

CenterPoint Energy will determine the location, size, kind and type of all gas mains, and the method and manner of installation.

All gas mains are the property of CenterPoint Energy. No building, structure or slab shall be constructed over a gas main without CenterPoint Energy's prior written consent.

4.02 Location of Gas Mains

Gas mains will normally be installed in streets or alleys which have been dedicated as a public way, or in dedicated utility easements, all of which will be graded to within six (6) inches, if required, of a permanent established elevation.

Gas mains will not be installed on private property unless CenterPoint Energy deems it necessary and desirable to do so and all necessary easements are obtained.

4.03 Permits

All permits, or blanket approvals, as may be required, must be issued to CenterPoint Energy prior to installation of gas mains.

4.04 Economic Feasibility

CenterPoint Energy will apply the general principle that the rendering of gas service to the applicant shall be economically feasible so that the cost of extending such service will not have an undue burden on other customers. In determining whether the expenditure for gas service is economically feasible, CenterPoint Energy shall take into consideration the total cost of serving the applicant and the expected revenue from the applicant.

Once CenterPoint Energy waives any additional customer charges for main and service extensions, CenterPoint Energy cannot at any point recover those charges from ratepayers.

4.04 Economic Feasibility (Continued)
 Cost Justification Formula

All Commercial/Industrial main line extension projects and service line extension projects will be justified using the following formula:

Allowable Investment	=	Est. Annual Gas Margin	Divided by	Cost of Service Factor
<hr/>				
COST OF SERVICE FACTOR		I/C FIRM		DUAL FUEL
		13.31%		16.59%

Estimated annual gas margin is the annual basic charge plus the delivery charge per therm less the conservation cost recovery charge (CCRC) per therm multiplied by estimated annual sales.

$$\text{Cost of Service Factor} = \frac{\text{Annual costs incurred as a percentage of the original investment}}{\text{Net investment balance as a percentage of the original investment}}$$

The following Cost of Service Factors will be updated annually using the calculation above:

- Commercial/Industrial New Installation
- Dual Fuel New Installation

Original investment is the cost incurred to add a new firm or interruptible commercial/industrial customer.

The costs incurred include depreciation, property taxes and pre-tax rate of return. Depreciation is based on the rates from the most recent filed depreciation study. Property taxes are based on the actual rate for the previous year. The pre-tax rate of return is based on the capital structure approved in the most recent rate case.

The net investment balance is the balance of the original investment less accumulated depreciation and accumulated deferred income taxes. Tax depreciation rates used to calculate accumulated deferred income taxes are from the most recent applicable depreciation tables issued by the Internal Revenue Service. This factor is calculated at the 5th year for firm customers and the 1st year for interruptible customers.

Federal and state tax rates used in the calculation are the current statutory rates for Minnesota utilities.

4.05 Expense of Installation - Gas Mains

If in the opinion of CenterPoint Energy, gas service is not now, nor ever will be, economically feasible, CenterPoint Energy will make an estimate of the cost of the project and the extension will nevertheless be made only if the applicant pays a non-refundable contribution-in-aid-of-construction to CenterPoint Energy for the portion of the capital expenditure and annual operating costs not justified by the annual revenue.

The applicant may pay the contribution in equal monthly installments over a period not to exceed ninety (90) days interest free.

4.05 Expense of Installation - Gas Mains (Continued)

CenterPoint Energy may install gas mains without charge to service residential, commercial or industrial users where it deems the anticipated revenue is sufficient to warrant such installation or in other cases where CenterPoint Energy determines the conditions justify such installation.

CenterPoint Energy may in its discretion install gas mains without charge to areas where water and sanitary sewer mains are in place.

When the gas main line is installed between November 1 and April 1, inclusive, because the requirements set forth by CenterPoint Energy to complete installation during normal construction were not met or because the customer's property, or the streets leading thereto, are not ready to receive the pipe, such work may be subject to a fixed winter construction charge. (See Section VI, Part 15.01 on page 41.) Winter construction will not be undertaken by CenterPoint Energy where prohibited by law or where it is not practical or prudent to install gas service pipe during the winter season.

4.06 Advance for Construction Requirements

If the installation of a gas main is expected to be supported by future annual revenues, CenterPoint Energy shall require the applicant to make a refundable cash advance or provide a Letter of Credit for construction of main extension from the gas main in excess of 150 ft. of gas main allowance per residential structure using gas for primary space heating, calculated at \$3.00 per foot for each foot of gas main in excess of the allowance. The advance must be received before construction begins.

4.06 Advance for Construction Requirements (Continued)

Advances for residential gas main extensions are refundable without interest for a period of up to three (3) years from the date of completion of the main extension as additional customers are connected to the particular main extension for which the advance was made. For each such additional customer connected to the main extension within the three year period, CenterPoint Energy will refund semi-annually based upon the customer footage allowance and the cost per foot of main effective the year the main extension was installed.

The total amount refunded shall not exceed the amount of the original advance and any remaining balance at the end of three (3) years becomes a non-refundable contribution-in-aid of construction.



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G022, G008/C-20-795

Requested From: Kristine A. Anderson, Greater Minnesota Gas

Type of Inquiry: General

Nonpublic Public

Date of Request: 11/13/20

Response Due: 11/23/20

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): John Kundert

Email Address(es): john.kundert@state.mn.us

Phone Number(s): 651-600-1182

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 1
Topic: Web Construction New Warehouse on 192nd Lane, Mankato
Reference(s): Complaint, page 4

Request:

- a. Did Web Construction ever contact GMG regarding the extension of natural gas service to its proposed new warehouse located on 192nd Lane, Mankato?
- b. If so, please provide the analysis that supports the economic expansion of GMG's distribution system to this customer.
- c. What is the current status of this facility?

GMG'S RESPONSE:

- a. *Web Construction did not contact GMG regarding its proposed new warehouse located on 192nd Lane, Mankato. While GMG does not know the specific address of the new warehouse, based on property records and what GMG has been able to glean, GMG believes that the facility is being constructed on a parcel that already has GMG service to another Web Construction and/or Williams building.*
- b. *Since GMG was not approached about the facility, GMG does not have such analysis. However, since GMG does have main facilities directly in front of the Web Construction and Williams parcels, to the extent that the facility is being built near the other Web/Williams buildings, GMG would not have to incur any cost to serve the facility other than a standard service installation.*
- c. *GMG believes that the building is under construction.*

To be completed by responder

Response Date: November 16, 2020
Response by: Kristine Anderson
Email Address: kanderson@greatermngas.com
Phone Number: 507-209-2110

CNP SMALL COMMERCIAL FIRM SALES B BILL

Month	Customer Charge (\$/Month)	Non-gas Delivery Charge (\$/Dth.)	Decoupling Adjustment (\$/Dth.)	Gas Affordability (GAP) (\$/Dth.)	Interim Volumetric Surcharge (\$/Dth.)	Commodity Cost (\$/Dth.) (1)	Demand (\$/Dth.)(2)	True-Up Factor (\$/Dth.)	Total Effective Rate (\$/Dth.)	Average Customer Use (Dth./Month)(3)	Total Monthly Bill (\$/Month)
											[TRADE SECRET BEGINS]
Jul-19	\$ 21.0000	\$ 1.7529	\$ (0.1190)	\$ 0.0441	\$ -	\$ 2.0580	\$ 0.8722	\$ 0.3620	\$ 4.9702		
Aug-19	\$ 21.0000	\$ 1.7529	\$ (0.1190)	\$ 0.0441	\$ -	\$ 2.0580	\$ 0.8722	\$ 0.3620	\$ 4.9702		
Sep-19	\$ 21.0000	\$ 1.7529	\$ (0.1190)	\$ -	\$ -	\$ 1.9537	\$ 0.8722	\$ 0.0134	\$ 4.4732		
Oct-19	\$ 21.0000	\$ 1.7529	\$ (0.1046)	\$ -	\$ -	\$ 2.0567	\$ 0.9684	\$ 0.0134	\$ 4.6868		
Nov-19	\$ 21.0000	\$ 1.7664	\$ (0.1046)	\$ -	\$ -	\$ 2.8744	\$ 0.8726	\$ 0.0134	\$ 5.4222		
Dec-19	\$ 21.0000	\$ 1.7664	\$ (0.1046)	\$ -	\$ -	\$ 3.2624	\$ 0.8180	\$ 0.0134	\$ 5.7556		
Jan-20	\$ 23.8000	\$ 1.7664	\$ (0.1046)	\$ -	\$ 0.2341	\$ 3.0697	\$ 0.9127	\$ 0.0134	\$ 5.8917		
Feb-20	\$ 23.8000	\$ 1.7664	\$ (0.1046)	\$ -	\$ 0.2341	\$ 2.6001	\$ 1.4585	\$ 0.0134	\$ 5.9679		
Mar-20	\$ 23.8000	\$ 1.7664	\$ (0.1046)	\$ -	\$ 0.2341	\$ 2.1136	\$ 1.0804	\$ 0.0134	\$ 5.1033		
Apr-20	\$ 23.8000	\$ 1.7664	\$ (0.1046)	\$ -	\$ 0.2341	\$ 1.5151	\$ 1.5046	\$ 0.0134	\$ 4.9290		
May-20	\$ 23.8000	\$ 1.7664	\$ (0.1046)	\$ -	\$ 0.2341	\$ 1.8217	\$ 1.5046	\$ 0.0134	\$ 5.2356		
Jun-20	\$ 23.8000	\$ 1.7664	\$ (0.1046)	\$ -	\$ 0.2341	\$ 1.7088	\$ 1.1513	\$ 0.0134	\$ 4.7694		
											[TRADE SECRET ENDS]
											Total Annual Bill (\$/yr.) \$ 18,065.47

(1) Copied from CNP's monthly PGA filings

(2) Copied from CNP's monthly PGA filings

(3) Hybrid estimate of annual Small Firm Commercial customer usage

GMG SMALL FIRM COMMERCIAL BILL

Month	Customer Charge (\$/Month)	Non-gas Delivery Charge (\$/Dth.)	Gas Affordability (GAP) (\$/Dth.)	Commodity Cost (\$/Dth.) (1)	Demand (\$/Dth.)(2)	True-Up Factor (\$/Dth.)	Total Effective Rate (\$/Dth.)	Average Customer Use (Dth./Month)(3)	Total Monthly Bill (\$/Month)
									[TRADE SECRET BEGINS]
Jul-19	\$ 40.0000	\$ 3.9365	\$ -	\$ 2.1514	\$ 0.7922	\$ 0.1076	\$ 6.9877		
Aug-19	\$ 40.0000	\$ 3.9365	\$ -	\$ 2.2107	\$ 0.7922	\$ 0.1076	\$ 7.0470		
Sep-19	\$ 40.0000	\$ 3.9365	\$ -	\$ 2.1489	\$ 0.7922	\$ (0.0926)	\$ 6.7850		
Oct-19	\$ 40.0000	\$ 3.9365	\$ -	\$ 2.2384	\$ 0.7922	\$ (0.0926)	\$ 6.8745		
Nov-19	\$ 40.0000	\$ 3.9365	\$ -	\$ 2.7734	\$ 0.8794	\$ (0.0926)	\$ 7.4967		
Dec-19	\$ 40.0000	\$ 3.9365	\$ -	\$ 3.0830	\$ 0.8794	\$ (0.0926)	\$ 7.8063		
Jan-20	\$ 40.0000	\$ 3.9365	\$ -	\$ 3.0540	\$ 1.3773	\$ (0.0926)	\$ 8.2752		
Feb-20	\$ 40.0000	\$ 3.9365	\$ -	\$ 2.9824	\$ 1.3773	\$ (0.0926)	\$ 8.2036		
Mar-20	\$ 40.0000	\$ 3.9365	\$ -	\$ 3.1828	\$ 1.3297	\$ (0.0926)	\$ 8.3564		
Apr-20	\$ 40.0000	\$ 3.9365	\$ -	\$ 1.8182	\$ 1.3491	\$ (0.0926)	\$ 7.0112		
May-20	\$ 40.0000	\$ 3.9365	\$ -	\$ 2.6345	\$ 1.3491	\$ (0.0926)	\$ 7.8275		
Jun-20	\$ 40.0000	\$ 3.9365	\$ -	\$ 2.6272	\$ 1.0578	\$ (0.0926)	\$ 7.5289		

[TRADE SECRET ENDS]

Total Annual Bill (\$/yr.) \$ 26,099.87

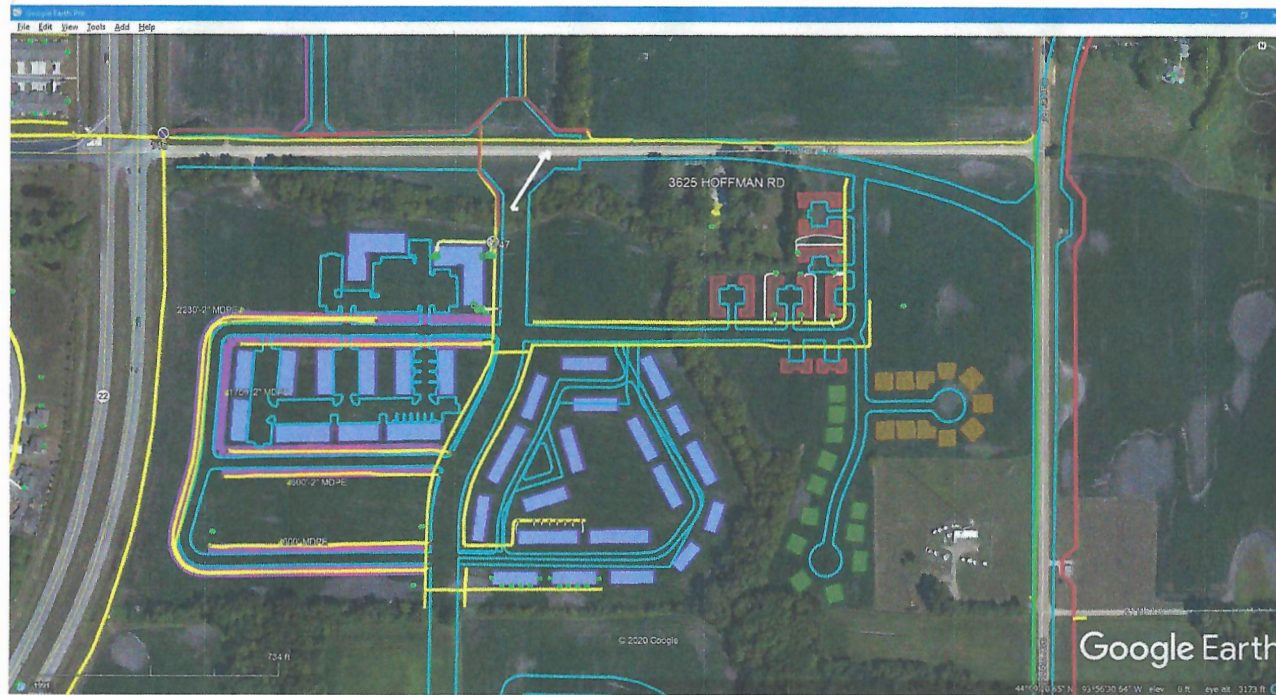
(1) Copied from GMG's monthly PGA filings

(2) Copied from GMG's monthly PGA filings

(3) Hybrid estimate of annual Small Firm Commercial customer usage



EXHIBIT E



Existing Customer 3625 Hoffman Road shown in upper right quadrant.

Yellow and red lines show GMG facilities.

Purple and red buildings are currently served by GMG.

Green and orange buildings are planned development that has been awarded to GMG.

CenterPoint presumably intends to parallel GMG's facilities running on the north side of Hoffman Road.



[TRADE SECRET DATA HAS BEEN EXCISED]

State of Minnesota
Minnesota Department of Commerce

Utility Information Request

Docket Number: G-022, G-008/C-20-795 - GMG Complaint Date of Request: 11/13/2020

Requested From: CenterPoint Energy Minnesota Gas

Response Due: 11/23/2020

Analyst Requesting Information: John Kundert

Type of Inquiry: Other

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
DOC 005	<p data-bbox="459 683 1284 757">Topic: Memory Care Facility located at 3625 Hoffman Road, Mankato Reference(s): Page 2</p> <p data-bbox="459 790 1345 1032">b. Please provide a copy of the signed service agreement between the owners of this new facility and CenterPoint. If a service agreement has not been signed yet, when does CenterPoint anticipate one will be signed? c. Please provide the analysis that supports the economic expansion of CenterPoint's distribution system to this customer. d. Provide any and all work order(s) associated with the construction of the distribution facilities necessary to serve this customer.</p> <p data-bbox="459 1066 587 1099">Response:</p> <p data-bbox="459 1133 1345 1234">b. No service agreement has been signed between the owners of the new facility and CenterPoint Energy. CenterPoint Energy does not have information on when if ever a service agreement will be signed.</p> <p data-bbox="459 1267 1345 1339">c. No analysis has been performed to support expansion of CenterPoint Energy's system to this potential customer.</p> <p data-bbox="459 1373 1345 1440">d. There are no work orders associated with expansion of service to this potential customer.</p>

Response By: Erica Larson
Title: Senior Analyst, Regulatory & Rates
Department: Mng Smr Reg Svc Rev Req
Telephone: 612-321-4334



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G022, G008/C-20-795

Requested From: Kristine A. Anderson, Greater Minnesota Gas

Type of Inquiry: General

Nonpublic Public

Date of Request: 11/13/20

Response Due: 11/23/20

SEND RESPONSE VIA **EMAIL TO:** Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): John Kundert

Email Address(es): john.kundert@state.mn.us

Phone Number(s): 651-600-1182

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 2
Topic: Memory Care Facility located at 3625 Hoffman Road, Mankato
Reference(s): Complaint, Page 6

Request:

- a. Please provide the analysis that supports the economic expansion of GMG's distribution system to this customer.
- b. What is the status of this facility?

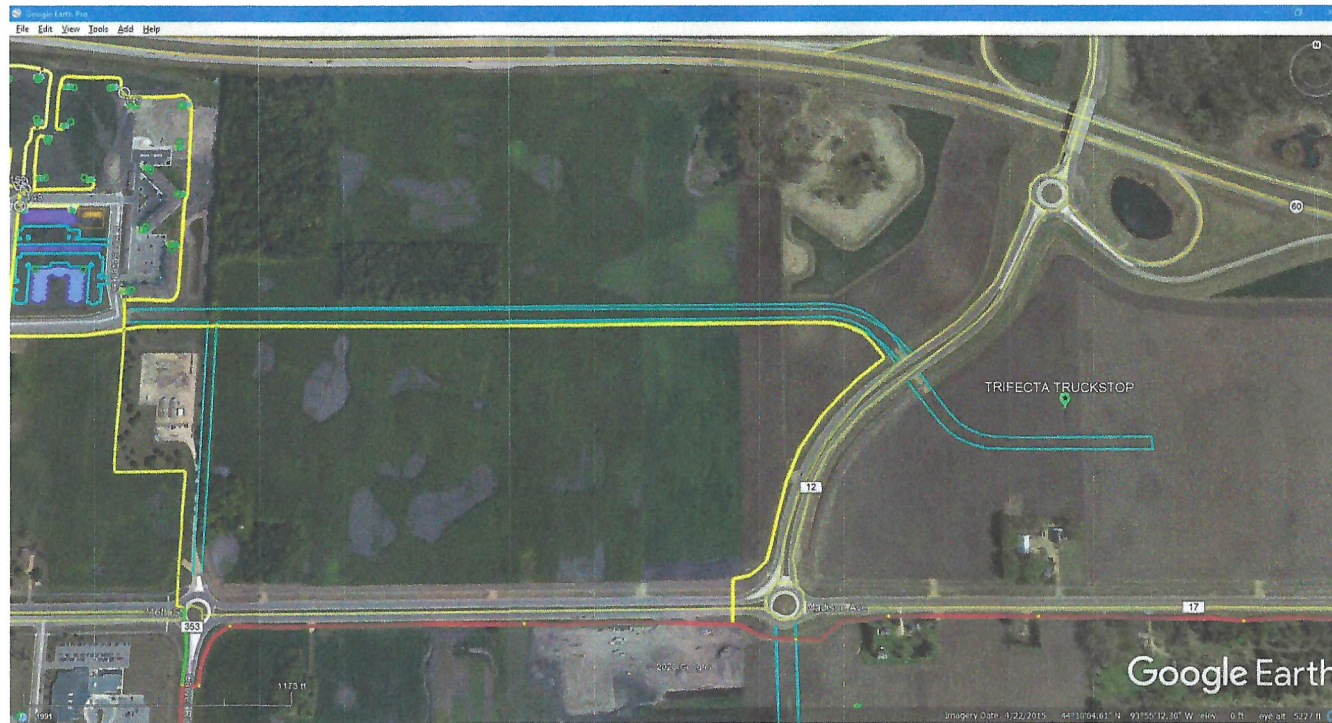
GMG'S RESPONSE:

- a. *Since GMG already provides service to the current owner (which will also own the memory care building) at the residence on the property, GMG does not need to expand its distribution system to serve the customer. Based on the facility design, a slight change to the service line and meter set and location may be required, but GMG would not incur any expenses beyond that.*
- b. *GMG has cut and capped the line at the customer's request. GMG believes that the existing house may have already been demolished or that demolition is in progress to prepare for imminent construction of the owner/customer's replacement building on the same site.*

To be completed by responder

Response Date: November 16, 2020
Response by: Kristine Anderson
Email Address: kanderson@greatermngas.com
Phone Number: 507-209-2110

EXHIBIT D



Trifecta Truck Stop on mid-right side.
Yellow and red lines show GMG facilities.
Purple buildings are currently served by GMG.
CenterPoint presumably intends to parallel GMG's facilities running on the south side of Adams across the middle of the map.



[TRADE SECRET DATA HAS BEEN EXCISED]

Capital Costs

Main line installation costs

Line size and type:	Footage:	Directional bore? (Type 2 used most)	Main installation cost:
3" Plastic	4369		
3" Plastic	1400	Type 2	DB Cty Rd 12
			Total main cost:

Service line installation costs

Line size and type:	Footage:	Directional bore? (Type 2 used most)	
1 1/4" Plastic	105		Store
1 1/4" Plastic	105		Car wash
Total footage:	620 5979		Total service line cost:

Meter installation costs

Meter type:	Number of sets:	Per-unit cost:	Max CFH @ 2#
5M	425		5600 955
			Total meter cost:
			Total project costs:

Economic Feasibility Analysis

Expected Annual Consumption (Therms):
 Delivery charge (per therm):
 Customer charge (annual total, all cust.):
 Estimated Annual Margin
 Cost of service factor:
Allowable investment

Tax Gross Up

Grossed Up Customer Contribution



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G022, G008/C-20-795

Requested From: Kristine A. Anderson, Greater Minnesota Gas

Type of Inquiry: General

Nonpublic Public

Date of Request: 11/13/20

Response Due: 11/23/20

SEND RESPONSE VIA **EMAIL** TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): John Kundert

Email Address(es): john.kundert@state.mn.us

Phone Number(s): 651-600-1182

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 3
Topic: TriFecta Truck Stop
Reference(s): Complaint, Page 5

Request:

- a. Please provide the analysis that supports the economic expansion of GMG's distribution system to this customer.
- b. What is the status of this facility?

RESPONSE:

- a. *GMG has existing main across the street from the customer; hence, GMG does not need to expand its distribution system to serve the customer. GMG would simply need to install a long-side service line to the customer. When Jerry Williams of Web Construction originally advised GMG that it would be selected to provide the natural gas service to the customer, GMG's readily available main was a large part of the customer's reasoning, as there would be no need to wait for or contribute cost to a main extension.*
- b. *GMG believes that construction of the truck stop has not started.*

To be completed by responder

Response Date: November 16, 2020
Response by: Kristine Anderson
Email Address: kanderson@greatermngas.com
Phone Number: 507-209-2110

CNP COMMERCIAL BILL

Month	Customer Charge (\$/month)	Non-gas Delivery Charge (\$/Dth.)	Decoupling Adjustment (\$/Dth.)	Gas Affordability (GAP)(\$/Dth.)	Interim Volumetric Surcharge (\$/Dth.)	Commodity Cost (\$/Dth.)(1)	Demand (\$/Dth.)(2)	True-Up Factor (\$/Dth.)	Total Effective Rate (\$/Dth.)	Average Customer Use (Dth./Month) (3)	Total Monthly Bill (\$)
Jul-19	\$ 95.0000	\$ 1.5795	\$ (0.1152)	\$ 0.0441	\$ -	\$ 2.0580	\$ 0.8722	\$ 0.3620	\$ 4.8006		[TRADE SECRET BEGINS]
Aug-19	\$ 95.0000	\$ 1.5795	\$ (0.1152)	\$ 0.0441	\$ -	\$ 2.0580	\$ 0.8722	\$ 0.3620	\$ 4.8006		
Sep-19	\$ 95.0000	\$ 1.5795	\$ (0.1279)	\$ -	\$ -	\$ 1.9537	\$ 0.8722	\$ 0.0134	\$ 4.2909		
Oct-19	\$ 95.0000	\$ 1.5930	\$ (0.1279)	\$ -	\$ -	\$ 2.0567	\$ 0.9684	\$ 0.0134	\$ 4.5036		
Nov-19	\$ 95.0000	\$ 1.5930	\$ (0.1279)	\$ -	\$ -	\$ 2.8744	\$ 0.8726	\$ 0.0134	\$ 5.2255		
Dec-19	\$ 95.0000	\$ 1.5930	\$ (0.1279)	\$ -	\$ -	\$ 3.2624	\$ 0.8180	\$ 0.0134	\$ 5.5589		
Jan-20	\$ 95.0000	\$ 1.5930	\$ (0.1279)	\$ -	\$ 0.2103	\$ 3.0697	\$ 0.9127	\$ 0.0134	\$ 5.6712		
Feb-20	\$ 95.0000	\$ 1.5930	\$ (0.1279)	\$ -	\$ 0.2103	\$ 2.6001	\$ 1.4585	\$ 0.0134	\$ 5.7474		
Mar-20	\$ 95.0000	\$ 1.5930	\$ (0.1279)	\$ -	\$ 0.2103	\$ 2.1136	\$ 1.0804	\$ 0.0134	\$ 4.8828		
Apr-20	\$ 95.0000	\$ 1.5930	\$ (0.1279)	\$ -	\$ 0.2103	\$ 1.5151	\$ 1.5046	\$ 0.0134	\$ 4.7085		
May-20	\$ 95.0000	\$ 1.5930	\$ (0.1279)	\$ -	\$ 0.2103	\$ 1.8217	\$ 1.5046	\$ 0.0134	\$ 5.0151		
Jun-20	\$ 95.0000	\$ 1.5930	\$ (0.1279)	\$ -	\$ 0.2103	\$ 1.7088	\$ 1.1513	\$ 0.0134	\$ 4.5489		

[TRADE SECRET ENDS]

Total Annual Bill (\$/yr) \$ 277,312.21

- (1) Copied from CNP's monthly PGA filings
- (2) Copied from CNP's monthly PGA filings
- (3) Hybrid estimate of Trifecta Truck Stop annual customer usage

GMG COMMERCIAL BILL

Month	Customer Charge \$/month)	Non-gas Delivery Charge (\$/Dth.)	Gas Affordability (GAP)(\$/Dth.)	Commodity Cost (\$/Dth.)(1)	Demand (\$/Dth.)(2)	True-Up Factor (\$/Dth.)	Total Effective Rate (\$/Dth.)	Average Customer Use (Dth./Mont h) (3)	Total Monthly Bill (\$)
									[TRADE SECRET BEGINS]
Jul-19	\$ 400.0000	\$ 3.5865	\$ -	\$ 2.1514	\$ 0.7922	\$ 0.1076	\$ 6.6377		
Aug-19	\$ 400.0000	\$ 3.5865	\$ -	\$ 2.2107	\$ 0.7922	\$ 0.1076	\$ 6.6970		
Sep-19	\$ 400.0000	\$ 3.5865	\$ -	\$ 2.1489	\$ 0.7922	\$ (0.0926)	\$ 6.4350		
Oct-19	\$ 400.0000	\$ 3.5865	\$ -	\$ 2.2384	\$ 0.7922	\$ (0.0926)	\$ 6.5245		
Nov-19	\$ 400.0000	\$ 3.5865	\$ -	\$ 2.7734	\$ 0.8794	\$ (0.0926)	\$ 7.1467		
Dec-19	\$ 400.0000	\$ 3.5865	\$ -	\$ 3.0830	\$ 0.8794	\$ (0.0926)	\$ 7.4563		
Jan-20	\$ 400.0000	\$ 3.5865	\$ -	\$ 3.0540	\$ 1.3773	\$ (0.0926)	\$ 7.9252		
Feb-20	\$ 400.0000	\$ 3.5865	\$ -	\$ 2.9824	\$ 1.3773	\$ (0.0926)	\$ 7.8536		
Mar-20	\$ 400.0000	\$ 3.5865	\$ -	\$ 3.1828	\$ 1.3297	\$ (0.0926)	\$ 8.0064		
Apr-20	\$ 400.0000	\$ 3.5865	\$ -	\$ 1.8182	\$ 1.3491	\$ (0.0926)	\$ 6.6612		
May-20	\$ 400.0000	\$ 3.5865	\$ -	\$ 2.6342	\$ 1.3491	\$ (0.0926)	\$ 7.4772		
Jun-20	\$ 400.0000	\$ 3.5865	\$ -	\$ 2.6272	\$ 1.0578	\$ (0.0926)	\$ 7.1789		

[TRADE SECRET ENDS]

Total Annual Bill (\$/yr) \$ 400,888.85

(1) Copied from GMG's monthly PGA filings

(2) Copied from GMG's monthly PGA filings

(3) Hybrid estimate of Trifecta Truck Stop annual customer usage

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, 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
Public Supplemental Comments**

Docket No. G022, G008/C-20-795

Dated this **20th** day of **January 2021**

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-795_Official
Brenda A.	Bjorklund	brenda.bjorklund@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-795_Official
Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-795_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-795_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_20-795_Official
Brian	Gardow	bgardow@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-795_Official
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-795_Official
Amber	Lee	Amber.Lee@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-795_Official
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-795_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-795_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-795_Official