



*A Division of Montana-Dakota Utilities Co.*

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November 27, 2024

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

**Re: Additional Informational Update Filing on Great Plains' 2024 Demand Entitlement Filing  
Docket No. G004/M-24-234**

Dear Mr. Seuffert:

Great Plains Natural Gas Co. (Great Plains), a Division of Montana-Dakota Utilities Co. (Montana-Dakota), herewith electronically submits an additional informational update filing to the June 28, 2024 Demand Entitlement filing (June 28 DEQ), pursuant to Minnesota Rule 7825.2910, Subpart 2, in the above referenced docket.

The demand changes proposed in the June 28 DEQ assumed the Wahpeton Expansion Project<sup>1</sup> (Project) with an in-service date of November 1, 2024. Because of weather delays, the project was not completed by the proposed date, therefore Great Plains filed an informational update on October 31, 2024 to discuss changes since that filing. With the Project completion, and an in-service date of December 1, 2024, Great Plains is filing an additional informational update which reflects the Wahpeton, North Dakota customers transition from Great Plains' integrated gas system to Montana-Dakota's integrated gas system effective December 1, 2024, and updates to the June 28 DEQ filing.

**Capacity Releases**

In the June 28 DEQ filing, Great Plains' proposed demand profile included a VGT capacity release of 8,291 dk/day for five months to defray the cost of currently subscribed excess capacity by an estimated \$232,977 per year. As discussed in the October 31, 2024 informational update, the Company's plan regarding capacity releases has changed because of the delay in the Project.

Consistent with the April 27, 2020 Order in Docket No. G004/M-19-430, Great Plains provides information regarding its efforts to release capacity. Great Plains foresees no challenges to the successful release of Viking Gas Transmission (VGT) Zone 1-1 capacity. However, the releases will not be uniformly released between November 2024 and October 2025.

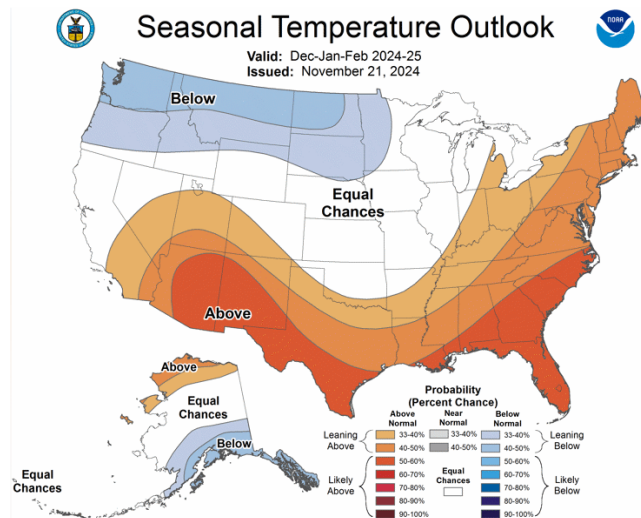
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<sup>1</sup> FERC Docket No. CP22-466.

Great Plains released a total of 9,000 dk/day for November 2024. The weighted average capacity release credit was \$15.30/dk/month, or \$137,700. The following paragraphs describe the Company's rational for the capacity releases.

Prior to securing required incremental December base supply, Great Plains had a total of 363,599 dk secured for delivery (11,729 dk/day). The calculated normalized delivery requirement for December will be 548,653 dk<sup>2</sup>. Great Plains targets base supply at 80-85% of normalized demand which required an incremental purchase of 75,323 dk to 102,756 dk (between 2,400 to 3,300 dk/day).

Great Plains considered the *Seasonal Temperature Outlook* as reported by NOAA and has elected to purchase 3,300 dk/day (85% of normal load) for December 2024. Two thousand dk/day of this amount must be purchased at locations indexed to either NNG-Demarc or NNG-Ventura to align supply and demand via transportation contracts. This purchase will have no impact on this discussion of demand entitlement.



Great Plains had the option of purchasing the remaining 1,300 dk/day of base supply from either VGT-Emerson or NNG-Ventura. Prices offered were:

Table 1

Location	Total Quantity (dk)	Rate	Cost
Marshall (Ventura)	40,300	\$4.18/dk	\$168,454
Emerson	40,300	\$2.52/dk	\$101,556
		<b>Savings</b>	<b>\$66,898</b>

Great Plains elected to hold and use the equivalent 1,300 dk/day of capacity and capture the \$66,898<sup>3</sup> gas commodity savings.

<sup>2</sup> Now excluding requirements for Wahpeton, ND customers.

<sup>3</sup> Equivalent to \$51.46/dk/month capacity release, which is greater than the value of the capacity in the release market.

Great Plains has released its remaining excess capacity of 7,000 dk/day for \$30.32/dk/month, netting a credit of \$212,240 for the month of December 2024. This provides a season-to-date total savings to customers of \$416,838. While the Company has defrayed more than the amount noted in the June 28 DEQ, it will continue to maximize this asset to the benefit of the customer for the remainder of the 2024-2025 heating season.

### **Updated Demand Costs**

In the June 28 DEQ filing, Great Plains proposed to release the amount of FT-A capacity on VGT of 8,291 dk due to the completed Wahpeton Expansion Projected, at an estimated price of \$5.62 per dk. With the project completion effective December 1, 2024, the released amount of FT-A capacity on VGT will be 7,000 dk/day, at an average price of \$30.32 per dk.

After incorporating the changes mentioned above, the 2024-2025 heating season capacity reserve is 11.9%, as shown in Exhibit A, which is an increase of 4.1% from Great Plains' proposed reserve margin in the June 28 DEQ filing.

Demand costs to be effective December 1, 2024 are reflected in Table 2 below:

Table 2  
Updated Demand Costs

Interstate Pipelines	Dk/Day	Rates	Months	Demand Cost
<u>Viking Firm</u>				
FT-A - Zone 1-1 (Cat. 3)	8,000	\$5.6200	12	\$539,520
FT-A - Zone 1-1 (Cat. 3)	5,000	5.6200	12	337,200
FT-A - Seasonal (Cat. 3)	2,000	5.6200	5	56,200
FT-A - Zone 1-1 (Cat. 3)	5,000	5.6200	12	337,200
FT-A - Zone 1-1 (Cat. 3)	3,291	5.6200	12	221,945
FT-A - Capacity Release	(7,000)	30.3200	5	(1,061,200)
<u>Northern Natural Firm</u>				
TFX - Summer	13,000	\$9.6760	7	\$880,516
TFX - Winter	13,000	25.7990	5	1,676,935
TFX Seasonal (November - March)	2,000	25.7990	5	257,990
TF12 Base - Summer	5,703	9.6760	7	386,276
TF12 Base - Winter	5,703	17.4170	5	496,646
TF12 Variable - Summer	5,242	9.6760	7	355,051
TF12 Variable - Winter	5,242	23.6090	5	618,792
TFX - Winter	5,200	25.7990	5	670,774
TFX - Annual (Summer Rate)	3,000	9.6760	7	203,196
TFX - Annual (Winter Rate)	3,000	25.7990	5	386,985
FDD-1 Reservation	4,640	3.2345	12	180,097
Interruptible Demand Credit				(400,760)
Total Demand Charges				\$6,143,363

The annual updated demand change is an increase of \$0.2840 per dk from rates effective November 1, 2024, as shown on Exhibit C. Please see Table 3 for the annual demand rate impacts, effective December 1, 2024, and reflecting the changes noted above.

Table 3  
Annual Demand Rate Impacts

Effective date	Residential Customer (81.2 dk)	Total Change Residential	Firm General Service (436.0 dk)	Total Change Firm General Service
November 1, 2024	\$158.74		\$852.34	
Change due to update	\$23.06	14.50%	\$123.82	14.50%
December 1, 2024	\$181.80		\$976.16	

In support of updating Docket No. G004/M-24-234, Great Plains has updated the following exhibits to show the impact of the changes listed above.

Exhibit A – Design Day Capacity  
Exhibit B – Demand Profile  
Exhibit C – Rate Impacts  
Exhibit D – Demand Entitlement Analysis

Per the Department's request in its Response Comments to Docket No. G004/M-15-645, dated August 31, 2016, Great Plains has included a red-lined version of the exhibits as Exhibit E.

Please contact me at (701) 222-7855 or [travis.jacobson@mdu.com](mailto:travis.jacobson@mdu.com), or Kristin Stastny at (612) 977-8656 if you have any questions regarding this filing.

Sincerely,

*/s/ Travis R. Jacobson*

Travis R. Jacobson  
Director of Regulatory Affairs

cc: Kristin Stastny

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

	Customer Factors 1/			Design HDD 2/	Customers 3/	Projected Customers 4/	Peak/ Customer	Projected Peak	L&UA 5/	Projected Design	Proposed Capacity	Reserve
	Dk/Day	Dk/DD	RSqr					Day (Dk)				
<u>Viking Firm</u>												
Crookston	0.05056	0.01424	0.99592	96	2,645	2,647	1.41760	3,743	26	3,769		
North 4	0.05296	0.01440	0.99576	91	7,461	7,495	1.36336	10,189	71	10,260		
Total					10,106	10,142		13,932	97	14,029		
Northern Natural Firm	0.05089	0.01673	0.99602	83	12,195	12,188	1.43948	17,526	123	17,649		
Grand Total					22,301	22,330		31,458	220	31,678	35,436	11.9%

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

2/ Design Heating Degree Days Base 60 degrees F.

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

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

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

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

<b><u>Demand Profile (Dk)</u></b>	<b><u>Authorized Amount</u></b>	<b><u>Proposed Change</u></b>	<b><u>Proposed Amount</u></b>	<b><u>Contract Length</u></b>	<b><u>Expiration Date</u></b>
<u>Viking</u>					
FT-A - Zone 1-1 (Cat. 3)	8,000	0	8,000	5 years	10/31/2027
FT-A - Zone 1-1 (Cat. 3)	5,000	0	5,000	5 years	10/31/2027
FT-A - Seasonal (Cat. 3)	2,000	0	2,000	5 years	10/31/2027
FT-A - Zone 1-1 (Cat. 3)	5,000	0	5,000	5 years	10/31/2028
FT-A - Zone 1-1 (Cat. 3)	3,291	0	3,291	10 years	10/31/2032
FT-A - Capacity Release	(4,291)	(2,709)	(7,000)	5 months	3/31/2025
Total	19,000	(2,709)	16,291		
<u>Northern Natural</u>					
TF12 Base (Summer and Winter)	3,531	2,172	5,703	5 years	10/31/2029
TF12 Variable (Summer and Winter)	4,004	1,238	5,242	5 years	10/31/2029
TF5 (November - March)	3,410	(3,410)	0	5 years	10/31/2029
TFX Seasonal (November - March)	5,200	0	5,200	5 years	10/31/2026
TFX (Annual)	2,000	0	2,000	5 years	10/31/2026
TFX (Annual)	1,000	0	1,000	2.5 years	3/31/2025
Total	19,145	0	19,145		
Demand Profile Total	38,145	(2,709)	35,436		
<u>Supplemental Capacity</u>					
TFX Seasonal (November - March)	2,000	0	2,000	5 years	10/31/2026
TFX (Annual)	13,000	0	13,000	5 years	3/31/2029
Total	15,000	0	15,000		
Total Transmission Capacity	53,145	(2,709)	50,436		
<u>Storage</u>					
FDD-1 Reservation	4,640	0	4,640	4 years	5/31/2028
Heating Season Total Capacity:	38,145	(2,709)	35,436		
Non-Heating Season Total Capacity:	31,826	3,410	35,236		
Forecasted Heating Season Design Day:	34,975	(3,297)	31,678		
Estimated Non-Heating Season Design Day:	19,194	(1,793)	17,401		
Heating Season Capacity: Surplus/(Shortage)	3,170	588	3,758		
Non-Heating Season Capacity: Surplus/(Shortage)	12,632	5,203	17,835		

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

2022-2023 Heating Season G004/M-22-310	Quantity (Dk)	2023-2024 Heating Season G004/M-23-262	Quantity (Dk)	2024-2025 Heating Season G004/M-24-234	Quantity (Dk)	Difference
FT-A (Cat. 3) (12 months)	8,000	FT-A (Cat. 3) (12 months)	8,000	FT-A (Cat. 3) (12 months)	8,000	0
FT-A (Cat. 3) (12 months)	10,000	FT-A (Cat. 3) (12 months)	10,000	FT-A (Cat. 3) (12 months)	10,000	0
FT-A (Cat. 3) (November - March)	2,000	FT-A (Cat. 3) (November - March)	2,000	FT-A (Cat. 3) (November - March)	2,000	0
FT-A (Cat. 3) (12 months)	3,291	FT-A (Cat. 3) (12 months)	3,291	FT-A (Cat. 3) (12 months)	3,291	0
FT-A Capacity Release	(4,291)	FT-A Capacity Release	(4,291)	FT-A Capacity Release	(7,000)	(2,709)
TFX (12 months) 1/	13,000	TFX (12 months) 1/	13,000	TFX (12 months) 1/	13,000	0
TFX (November - March) 1/	2,000	TFX (November - March) 1/	2,000	TFX (November - March) 1/	2,000	0
TF12 Base	4,128	TF12 Base	3,531	TF12 Base	5,703	2,172
TF12 Variable	3,407	TF12 Variable	4,004	TF12 Variable	5,242	1,238
TF5 (November- March)	3,410	TF5 (November- March)	3,410	TF5 (November- March)	0	(3,410)
TFX (November - March)	5,200	TFX (November - March)	5,200	TFX (November - March)	5,200	0
TFX (Annual)	2,000	TFX (Annual)	2,000	TFX (Annual)	2,000	0
TFX (Annual)	1,000	TFX (Annual)	1,000	TFX (Annual)	1,000	0
FDD-1 Reservation 1/	4,640	FDD-1 Reservation 1/	4,640	FDD-1 Reservation 1/	4,640	0
Heating Season Total Capacity	38,145	Heating Season Total Capacity	38,145	Heating Season Total Capacity	35,436	(2,709)
Non-Heating Season Total Capacity	31,826	Non-Heating Season Total Capacity	31,826	Non-Heating Season Total Capacity	35,236	3,410
Total Entitlement	38,145	Total Entitlement	38,145	Total Entitlement	35,436	(2,709)
Total Annual Transportation	31,826	Total Annual Transportation	31,826	Total Annual Transportation	35,236	3,410
Total Season Transportation	6,319	Total Season Transportation	6,319	Total Season Transportation	200	(6,119)
Percent TF-5	31.16%	Percent TF-5	31.16%	Percent TF-5	0.00%	-31.16%
Total Percent Seasonal	16.57%	Total Percent Seasonal	16.57%	Total Percent Seasonal	0.56%	-16.01%

1/ Does not impact demand profile.

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

Exhibit C  
Page 1 of 1

	Last Rate Case 1/	Last Demand Change 2/	Current Rates 3/	December 2024 Proposed 4/	% Change from		Change from
					Last Rate Case	Last Demand Change	Current Rates
<b>Residential Gas Service</b>							
Commodity Cost of Gas	\$2.23370	\$3.24790	\$2.61090	\$3.44290	54.1%	6.0%	\$0.83200
GCR 5/	(0.06280)	0.04290	0.72300	0.72300	-1251.3%	1585.3%	0.00000
Demand Cost of Gas	1.45680	1.82250	1.95490	2.23890	53.7%	22.8%	0.28400
Commodity Margin 1/	3.01710	3.01710	3.01710	3.01710	0.0%	0.0%	0.00000
CCRA 6/	(0.05970)	(0.00960)	(0.00960)	0.02020	-133.8%	-310.4%	0.02980
GAP 7/	0.02295	0.03399	0.05218	0.05218	127.4%	53.5%	0.00000
GUIC 8/	0.30410	0.21460	0.46420	0.46420	52.6%	116.3%	0.00000
RDM and MSC 9/	(0.31120)	(0.30100)	(0.49220)	(0.49220)	58.2%	63.5%	0.00000
Gas Event Surcharge 10/	0.00000	0.91670	0.00000	0.00000	N/A	-100.0%	0.00000
Total Rate	\$6.60095	\$8.98509	\$8.32048	\$9.46628	43.4%	5.4%	\$1.14580
Average Annual Usage (Dk)	81.2	81.2	81.2	81.2			
Average Annual Cost of Gas	\$536.00	\$729.59	\$675.62	\$768.66	43.4%	5.4%	\$93.04
<b>Firm General Service</b>							
Commodity Cost of Gas	\$2.23370	\$3.24790	\$2.61090	\$3.44290	54.1%	6.0%	\$0.83200
GCR 5/	(0.06280)	0.04290	0.72300	0.72300	-1251.3%	1585.3%	0.00000
Demand Cost of Gas	1.45680	1.82250	1.95490	2.23890	53.7%	22.8%	0.28400
Commodity Margin 1/	2.46850	2.46850	2.46850	2.46850	0.0%	0.0%	0.00000
CCRA 6/	(0.05970)	(0.00960)	(0.00960)	0.02020	-133.8%	-310.4%	0.02980
GAP 7/	0.02295	0.03399	0.05218	0.05218	127.4%	53.5%	0.00000
GUIC 8/	0.18030	0.18160	0.33660	0.33660	86.7%	85.4%	0.00000
RDM and MSC 9/	(0.19810)	(0.23490)	(0.35340)	(0.35340)	78.4%	50.4%	0.00000
Gas Event Surcharge 10/	0.00000	0.91670	0.00000	0.00000	N/A	-100.0%	0.00000
Total Rate	\$6.04165	\$8.46959	\$7.78308	\$8.92888	47.8%	5.4%	\$1.14580
Average Annual Usage (Dk)	436.0	436.0	436.0	436.0			
Average Annual Cost of Gas	\$2,634.16	\$3,692.74	\$3,393.42	\$3,892.99	47.8%	5.4%	\$499.57
<b>Customer Class</b>							
	Commodity Change		Demand Change		Total Change		Avg. Annual
	(\$/dk)	(Percent)	(\$/dk)	(Percent)	(\$/dk)	(Percent)	Bill Change
Residential Gas Service	\$0.8320	31.9%	\$0.2840	14.5%	\$1.1458	13.8%	\$93.04
Firm General Service	0.8320	31.9%	0.2840	14.5%	1.1458	14.7%	499.57

- 1/ Effective with service rendered on and after April 1, 2021 in Docket No. G004/GR-19-511.  
2/ Demand in Docket No. G004/M-23-262, effective November 1, 2023.  
3/ Most recently filed PGA: November 2024.  
4/ Includes seasonal capacity release of 7,000 dk and Minnesota normalized volumes.  
5/ Effective with service rendered on and after September 1, 2024 in Docket No. G004/AA-24-301.  
6/ Current rates effective with service rendered on and after October 1, 2023 in Docket No. G004/M-23-186. Proposed Rates effective with service rendered on and after December 1, 2024, in Docket No. G004-M-24-44.  
7/ Effective with service rendered on and after September 1, 2024 in Docket No. G004/M-24-37.  
8/ Effective with service rendered on and after October 1, 2024 in Docket No. G004/M-24-170.  
9/ Effective with service rendered on and after July 1, 2024, the Revenue Decoupling Mechanism rates only include the MSC component and is now identified on customers' bills as Margin Sharing Credit. - Docket No. G004/M-24-199.  
10/ Effective with service rendered on and after September 1, 2021 for 27 months in Docket Nos. G999/CI-21-135 and G004/M-21-235.

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



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

Heating Season	Number of Firm Customers			Design Day Requirement			Total Entitlement + Storage + Peak Shaving			
	(1) Number of Customers	(2) Change From Previous Year	(3) % Change From Previous Year	(4) Design Day (Dk)	(5) Change From Previous Year	(6) % Change From Previous Year	(7) Total Entitlement (Dk)	(8) Change From Previous Year	(9) % Change From Previous Year	(10) % of Reserve Margin [(7)-(4)]/(4)
2024-2025 1/	22,330	(2,375)	-9.61%	31,678	(3,297)	-9.43%	35,436	(2,709)	-7.10%	11.86%
2023-2024	24,705	(85)	-0.34%	34,975	(184)	-0.52%	38,145	0	0.00%	9.06%
2022-2023	24,790	72	0.29%	35,159	761	2.21%	38,145	(1,000)	-2.55%	8.49%
2021-2022	24,718	293	1.20%	34,398	476	1.40%	39,145	2,000	5.38%	13.80%
2020-2021	24,425	109	0.45%	33,922	(144)	-0.42%	37,145	200	0.54%	9.50%
2019-2020	24,316	76	0.31%	34,066	392	1.16%	36,945	1,400	3.94%	8.45%
2018-2019	24,240	243	1.01%	33,674	941	2.87%	35,545	1,100	3.19%	5.56%
2017-2018	23,997	184	0.77%	32,733	335	1.03%	34,445	200	0.58%	5.23%
Annual Average			<u>-0.74%</u>			<u>-0.21%</u>			<u>0.50%</u>	<u>8.99%</u>

Heating Season	Firm Peak Day Sendout			(14) Excess Per Customer [(7)-(4)]/(1)	(15) Design Day per Customer (4)/(1)	(16) Entitlement per Customer (7)/(1)	(17) Peak Day Sendout per Customer (11)/(1)
	(11) Firm Peak Day Sendout (Dk)	(12) Change From Previous Year	(13) % Change From Previous Year				
2024-2025 1/				0.1683	1.4186	1.5869	
2023-2024	30,083	(603)	-1.97%	0.1283	1.4157	1.5440	1.2177
2022-2023	30,686	808	2.70%	0.1205	1.4183	1.5387	1.2378
2021-2022	29,878	(1,367)	-4.38%	0.1920	1.3916	1.5837	1.2088
2020-2021	31,245	2,794	9.82%	0.1320	1.3888	1.5208	1.2792
2019-2020	28,451	(1,869)	-6.16%	0.1184	1.4010	1.5194	1.1701
2018-2019	30,320	1,679	5.86%	0.0772	1.3892	1.4664	1.2508
2017-2018	28,641	112	0.39%	0.0713	1.3640	1.4354	1.1935
Annual Average			<u>0.89%</u>	<u>0.1260</u>	<u>1.3984</u>	<u>1.5244</u>	<u>1.2226</u>

1/ Excludes Wahpeton, North Dakota customers.

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

Heating Season	Number of Firm Customers			Design Day Requirement			Total Entitlement + Storage + Peak Shaving			
	(1) Number of Customers	(2) Change From Previous Year	(3) % Change From Previous Year	(4) Design Day (Dk)	(5) Change From Previous Year	(6) % Change From Previous Year	(7) Total Entitlement (Dk)	(8) Change From Previous Year	(9) % Change From Previous Year	(10) % of Reserve Margin $[(7)-(4))/(4)$
2024-2025	22,330	(9)	-0.04%	31,678	94	0.30%	35,436	991	2.88%	11.86%
2023-2024	22,339			31,584			34,445			9.06%

Heating Season	Firm Peak Day Sendout			(14) Excess Per Customer $[(7)-(4))/(1)$	(15) Design Day per Customer $(4)/(1)$	(16) Entitlement per Customer $(7)/(1)$	(17) Peak Day Sendout per Customer $(11)/(1)$
	(11) Firm Peak Day Sendout (Dk)	(12) Change From Previous Year	(13) % Change From Previous Year				
2024-2025				0.1683	1.4186	1.5869	
2023-2024	27,031			0.1281	1.4139	1.5419	0.8264

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

	Customer Factors 1/			Design HDD 2/	Customers 3/	Projected Customers 4/	Peak/ Customer	Projected Peak Day (Dk)	L&UA 5/	Projected Design	Proposed Capacity	Reserve
	Dk/Day	Dk/DD	RSqr									
<u>Viking Firm</u>												
Crookston	0.05056	0.01424	0.99592	96	2,645	2,647	1.41760	3,743	26	3,769		
North 4	0.05296	0.01440	0.99576	91	7,461	7,495	1.36336	10,189	71	10,260		
Total					10,106	10,142		13,932	97	14,029		
Northern Natural Firm	0.05089	0.01673	0.99602	83	12,195	12,188	1.43948	17,526	123	17,649		
Grand Total					22,301	22,330		31,458	220	31,678	34,145 35,436	7.8% 11.09%

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

2/ Design Heating Degree Days Base 60 degrees F.

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

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

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

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

<b><u>Demand Profile (Dk)</u></b>	<b>Authorized Amount</b>	<b>Proposed Change</b>	<b>Proposed Amount</b>	<b>Contract Length</b>	<b>Expiration Date</b>
<u>Viking</u>					
FT-A - Zone 1-1 (Cat. 3)	8,000	0	8,000	5 years	10/31/2027
FT-A - Zone 1-1 (Cat. 3)	5,000	0	5,000	5 years	10/31/2027
FT-A - Seasonal (Cat. 3)	2,000	0	2,000	5 years	10/31/2027
FT-A - Zone 1-1 (Cat. 3)	5,000	0	5,000	5 years	10/31/2028
FT-A - Zone 1-1 (Cat. 3)	3,291	0	3,291	10 years	10/31/2032
FT-A - Capacity Release	(4,291)	(4,000) (2709)	(8,291) (7,000)	5 months	3/31/2025
Total	19,000	(4,000) (2709)	15,000 16,291		
<u>Northern Natural</u>					
TF12 Base (Summer and Winter)	3,531	1,598 2,172	5,129 5,703	5 years	10/31/2029
TF12 Variable (Summer and Winter)	4,004	1,812 1,238	5,816 5,242	5 years	10/31/2029
TF5 (November - March)	3,410	(3,410)	0	5 years	10/31/2029
TFX Seasonal (November - March)	5,200	0	5,200	5 years	10/31/2026
TFX (Annual)	2,000	0	2,000	5 years	10/31/2026
TFX (Annual)	1,000	0	1,000	2.5 years	3/31/2025
Total	19,145	0	19,145		
Demand Profile Total	38,145	(4,000) (2709)	34,145 35,436		
<u>Supplemental Capacity</u>					
TFX Seasonal (November - March)	2,000	0	2,000	5 years	10/31/2026
TFX (Annual)	13,000	0	13,000	5 years	3/31/2029
Total	15,000	0	15,000		
Total Transmission Capacity	53,145	(4,000) (2709)	49,145 50,436		
<u>Storage</u>					
FDD-1 Reservation	4,640	0	4,640	4 years	5/31/2028
Heating Season Total Capacity:	38,145	(4,000) (2709)	34,145 35,436		
Non-Heating Season Total Capacity:	31,826	3,410	35,236		
Forecasted Heating Season Design Day:	34,975	(3,297)	31,678		
Estimated Non-Heating Season Design Day:	19,194	(1,793)	17,401		
Heating Season Capacity: Surplus/(Shortage)	3,170	(703) 588	2,467 3,758		
Non-Heating Season Capacity: Surplus/(Shortage)	12,632	5,203	17,835		

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

2022-2023 Heating Season G004/M-22-310	Quantity (Dk)	2023-2024 Heating Season G004/M-23-262	Quantity (Dk)	2024-2025 Heating Season G004/M-24-234	Quantity (Dk)	Difference
FT-A (Cat. 3) (12 months)	8,000	FT-A (Cat. 3) (12 months)	8,000	FT-A (Cat. 3) (12 months)	8,000	0
FT-A (Cat. 3) (12 months)	10,000	FT-A (Cat. 3) (12 months)	10,000	FT-A (Cat. 3) (12 months)	10,000	0
FT-A (Cat. 3) (November - March)	2,000	FT-A (Cat. 3) (November - March)	2,000	FT-A (Cat. 3) (November - March)	2,000	0
FT-A (Cat. 3) (12 months)	3,291	FT-A (Cat. 3) (12 months)	3,291	FT-A (Cat. 3) (12 months)	3,291	0
FT-A Capacity Release	(4,291)	FT-A Capacity Release	(4,291)	FT-A Capacity Release	<del>(8,291)</del> (7,000)	<del>(4,000)</del> (2,709)
TFX (12 months) 1/	13,000	TFX (12 months) 1/	13,000	TFX (12 months) 1/	13,000	0
TFX (November - March) 1/	2,000	TFX (November - March) 1/	2,000	TFX (November - March) 1/	2,000	0
TF12 Base	4,128	TF12 Base	3,531	TF12 Base	<del>5,129</del> 5,703	<del>1,598</del> 2,172
TF12 Variable	3,407	TF12 Variable	4,004	TF12 Variable	<del>5,816</del> 5,242	<del>1,812</del> 1,238
TF5 (November- March)	3,410	TF5 (November- March)	3,410	TF5 (November- March)	0	(3,410)
TFX (November - March)	5,200	TFX (November - March)	5,200	TFX (November - March)	5,200	0
TFX (Annual)	2,000	TFX (Annual)	2,000	TFX (Annual)	2,000	0
TFX (Annual)	1,000	TFX (Annual)	1,000	TFX (Annual)	1,000	0
FDD-1 Reservation 1/	4,640	FDD-1 Reservation 1/	4,640	FDD-1 Reservation 1/	4,640	0
Heating Season Total Capacity	38,145	Heating Season Total Capacity	38,145	Heating Season Total Capacity	<del>34,145</del> 35,436	<del>(4,000)</del> (2,709)
Non-Heating Season Total Capacity	31,826	Non-Heating Season Total Capacity	31,826	Non-Heating Season Total Capacity	35,236	3,410
Total Entitlement	38,145	Total Entitlement	38,145	Total Entitlement	<del>34,145</del> 35,436	<del>(4,000)</del> (2,709)
Total Annual Transportation	31,826	Total Annual Transportation	31,826	Total Annual Transportation	35,236	3,410
Total Season Transportation	6,319	Total Season Transportation	6,319	Total Season Transportation	<del>(1,094)</del> 200	<del>(7,410)</del> (6,119)
Percent TF-5	31.16%	Percent TF-5	31.16%	Percent TF-5	0.00%	-31.16%
Total Percent Seasonal	16.57%	Total Percent Seasonal	16.57%	Total Percent Seasonal	<del>-3.20%</del> 0.56%	<del>-19.77%</del> -16.01%

1/ Does not impact demand profile.

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

Exhibit E  
Page 4 of 6

	Last Rate	Last Demand	Current	December 2024	% Change from				Change from		
	Case 1/	Change 2/	Rates 3/	Proposed 4/	Last Rate	Last Demand	Current	Current			
					Case	Change	Rates	Rates			
<b>Residential Gas Service</b>											
Commodity Cost of Gas	\$2.23370	\$3.24790	\$2.46170	\$2.46170	\$3.44290	-3.2%	54.1%	-33.4%	6.0%	31.9%	\$0.00000
GCR 5/	(0.06280)	0.04290	0.04290	0.04290	0.72300	-168.3%	-1251.3%	0.0%	1585.3%	0.0%	0.00000
Demand Cost of Gas	1.45680	1.82250	2.09450	2.52220	2.23890	73.1%	53.7%	38.4%	22.8%	14.5%	0.42770
Commodity Margin 1/	3.01710	3.01710	3.01710		3.01710		0.0%		0.0%	0.0%	0.00000
CCRA 6/	(0.05970)	(0.00960)	(0.00960)	(0.00960)	0.02020	-83.9%	-133.8%	0.0%	-310.4%	-310.4%	0.00000
GAP 7/	0.02295	0.03399	0.03399	0.03399	0.05218	48.1%	127.4%	0.0%	53.5%	0.0%	0.00000
GUIC 8/	0.30410	0.21460	0.21460	0.21460	0.46420	-29.4%	52.6%	0.0%	116.3%	0.0%	0.00000
RDM and MSC 9/	(0.31120)	(0.30100)	(0.49220)		(0.49220)		58.2%		63.5%	0.0%	0.00000
Gas Event Surcharge 10/	0.00000	0.91670	0.00000		0.00000		N/A		-100.0%	N/A	0.00000
Total Rate	\$6.60095	\$8.98509	\$7.06299	\$7.49069	\$9.46628	13.5%	43.4%	-16.6%	5.4%	13.8%	\$0.42770
Average Annual Usage (Dk)	81.2	81.2	81.2		81.2						
Average Annual Cost of Gas	\$536.00	\$729.59	\$573.51	\$608.24	\$768.66	13.5%	43.4%	-16.6%	5.4%	13.8%	\$34.73
<b>Firm General Service</b>											
Commodity Cost of Gas	\$2.23370	\$3.24790	\$2.46170	\$2.46170	\$3.44290	-3.2%	54.1%	-33.4%	6.0%	31.9%	\$0.00000
GCR 5/	(0.06280)	0.04290	0.04290	0.04290	0.72300	-168.3%	-1251.3%	0.0%	1585.3%	0.0%	0.00000
Demand Cost of Gas	1.45680	1.82250	2.09450	2.52220	2.23890	73.1%	53.7%	38.4%	22.8%	14.5%	0.42770
Commodity Margin 1/	2.46850	2.46850	2.46850		2.46850		0.0%		0.0%	0.0%	0.00000
CCRA 6/	(0.05970)	(0.00960)	(0.00960)	(0.00960)	0.02020	-83.9%	-133.8%	0.0%	-310.4%	-310.4%	0.00000
GAP 7/	0.02295	0.03399	0.03399	0.03399	0.05218	48.1%	127.4%	0.0%	53.5%	0.0%	0.00000
GUIC 8/	0.18030	0.18160	0.18160	0.18160	0.33660	0.7%	86.7%	0.0%	85.4%	0.0%	0.00000
RDM and MSC 9/	(0.19810)	(0.23490)	(0.35340)		(0.35340)		78.4%		50.4%	0.0%	0.00000
Gas Event Surcharge 10/	0.00000	0.91670	0.00000		0.00000		N/A		-100.0%	N/A	0.00000
Total Rate	\$6.04165	\$8.46959	\$6.62019	\$7.04789	\$8.92888	16.7%	47.8%	-16.8%	5.4%	14.7%	\$0.42770
Average Annual Usage (Dk)	436.0	436.0	436.0		436.0						
Average Annual Cost of Gas	\$2,634.16	\$3,692.74	\$2,886.40	\$3,072.88	\$3,892.99	16.7%	47.8%	-16.8%	5.4%	14.7%	\$186.48
	Commodity Change		Demand Change		Total Change		Avg. Annual				
<b>Customer Class</b>	(\$/dk)	(Percent)	(\$/dk)	(Percent)	(\$/dk)	(Percent)	Bill Change				
Residential Gas Service	\$0.0000	0.0%	\$0.4277	20.4%	\$0.4277	6.1%	\$34.73				
Firm General Service	0.0000	0.0%	0.4277	20.4%	0.4277	6.5%	186.48				

1/ Effective with service rendered on and after April 1, 2021 in Docket No. G004/GR-19-511.

2/ Demand in Docket No. G004/M-23-262, effective November 1, 2023.

3/ Most recently filed PGA: July 2024. November 2024.

4/ Includes seasonal capacity release of 8,291-dk and Minnesota normalized volumes. 7,000 dk and Minnesota normalized volumes.

5/ Effective with service rendered on and after September 1, 2023 in Docket No. G004/AA-23-381. 2024 in Docket No. G004/AA-24-301.

6/ Current rates effective with service rendered on and after October 1, 2023 in Docket No. G004/M-23-186. Proposed Rates effective with service rendered on and after December 1, 2024, in Docket No. G004-M-24-44.

7/ Effective with service rendered on and after October 1, 2023 in Docket No. G004/M-23-83. September 1, 2024 in Docket No. G004/M24-37.

8/ Effective with service rendered on and after October 1, 2023 in Docket No. G004/M-23-164. 2024 in Docket No. G004/M-24-170.

9/ Effective with service rendered on and after July 1, 2024, the Revenue Decoupling Mechanism rates only include the MSC component and is now identified on customers' bills as Margin Sharing Credit. - Docket No. G004/M-24-199.

10/ Effective with service rendered on and after September 1, 2021 for 27 months in Docket Nos. G999/CI-21-135 and G004/M-21-235.

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

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

Heating Season	Number of Firm Customers			Design Day Requirement			Total Entitlement + Storage + Peak Shaving							
	(1) Number of Customers	(2) Change From Previous Year	(3) % Change From Previous Year	(4) Design Day (Dk)	(5) Change From Previous Year	(6) % Change From Previous Year	(7) Total Entitlement (Dk)	(8) Change From Previous Year	(9) % Change From Previous Year	(10) % of Reserve Margin [(7)-(4)]/(4)				
2024-2025 1/	22,330	(2,375)	-9.61%	31,678	(3,297)	-9.43%	34,145	35,436	(4,000)	(2,709)	-10.49%	-7.1%	7.79%	11.86%
2023-2024	24,705	(85)	-0.34%	34,975	(184)	-0.52%	38,145		0		0.00%			9.06%
2022-2023	24,790	72	0.29%	35,159	761	2.21%	38,145		(1,000)		-2.55%			8.49%
2021-2022	24,718	293	1.20%	34,398	476	1.40%	39,145		2,000		5.38%			13.80%
2020-2021	24,425	109	0.45%	33,922	(144)	-0.42%	37,145		200		0.54%			9.50%
2019-2020	24,316	76	0.31%	34,066	392	1.16%	36,945		1,400		3.94%			8.45%
2018-2019	24,240	243	1.01%	33,674	941	2.87%	35,545		1,100		3.19%			5.56%
2017-2018	23,997	184	0.77%	32,733	335	1.03%	34,445		200		0.58%			5.23%
Annual Average			-0.74%			-0.21%					0.07%	0.50%	8.49%	8.99%

Heating Season	Firm Peak Day Sendout			(14) Excess Per Customer [(7)-(4)]/(1)	(15) Design Day per Customer (4)/(1)	(16) Entitlement per Customer (7)/(1)	(17) Peak Day Sendout per Customer (11)/(1)
	(11) Firm Peak Day Sendout (Dk)	(12) Change From Previous Year	(13) % Change From Previous Year				
2024-2025 1/				0.1105	0.1683	1.4186	1.5294 1.5869
2023-2024	30,083	(603)	-1.97%	0.1283	1.4157	1.5440	1.2177
2022-2023	30,686	808	2.70%	0.1205	1.4183	1.5387	1.2378
2021-2022	29,878	(1,367)	-4.38%	0.1920	1.3916	1.5837	1.2088
2020-2021	31,245	2,794	9.82%	0.1320	1.3888	1.5208	1.2792
2019-2020	28,451	(1,869)	-6.16%	0.1184	1.4010	1.5194	1.1701
2018-2019	30,320	1,679	5.86%	0.0772	1.3892	1.4664	1.2508
2017-2018	28,641	112	0.39%	0.0713	1.3640	1.4354	1.1935
Annual Average			0.89%	0.1188	0.1260	1.3984	1.5172 1.5244

1/ Excludes Wahpeton, North Dakota customers.

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

Heating Season	Number of Firm Customers			Design Day Requirement			Total Entitlement + Storage + Peak Shaving							
	(1) Number of Customers	(2) Change From Previous Year	(3) % Change From Previous Year	(4) Design Day (Dk)	(5) Change From Previous Year	(6) % Change From Previous Year	(7) Total Entitlement (Dk)		(8) Change From Previous Year		(9) % Change From Previous Year		(10) % of Reserve Margin [(7)-(4))/(4)	
2024-2025	22,330	(9)	-0.04%	31,678	94	0.30%	<del>34,145</del>	35,436	<del>(300)</del>	991	<del>-0.87%</del>	2.88%	<del>7.70%</del>	11.86%
2023-2024	22,339			31,584				34,445						9.06%
Heating Season	Firm Peak Day Sendout			(14) Excess Per Customer [(7)-(4))/(1)	(15) Design Day per Customer (4)/(1)	(16) Entitlement per Customer (7)/(1)	(17) Peak Day Sendout per Customer (11)/(1)							
	(11) Firm Peak Day Sendout (Dk)	(12) Change From Previous Year	(13) % Change From Previous Year											
2024-2025				<del>0.1105</del>	0.1683	<del>1.5291</del>	1.5869							
2023-2024	27,031			0.1281	1.4139	1.5419	0.8264							