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August 4, 2021

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

RE: Docket No. G004/M-21-217  
Supplemental Reply Comments to the Supplemental Comments of the  
Minnesota Department of Commerce, Division of Energy Resources

Dear Mr. Seuffert:

Great Plains Natural Gas Co. (Great Plains), a Division of Montana-Dakota Utilities Co., herewith electronically files its Supplemental Reply Comments to the Supplemental Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) filed on July 21, 2021.

In its Supplemental Comments, the Department recommends that the Commission accept the 2020 Gas Affordability Plan (GAP) report submitted by Great Plains and that in the future annual GAP report to be filed in March of 2022 that Great Plains be required to report on observations of any unusual GAP enrollment trends that could be caused by pandemic-related factors.

The Department also recommends discontinuing the following reporting requirements of the Commission's May 12, 2008 *Order* in Docket No. G004/M-07-1235:

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

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

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

Sincerely,

*/s/ Travis R. Jacobson*

Travis R. Jacobson  
Director of Regulatory Affairs