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September 6, 2019

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

**Re: Request to Modify Request to Implement Revised GUIC Adjustment Factors  
Docket No. G004/M-19-273**

Dear Mr. Wolf:

Great Plains Natural Gas Co. (Great Plains), a Division of Montana-Dakota Utilities Co., filed with the Minnesota Public Utilities Commission (Commission) its True-Up Report for 2018, 2019 Revenue Requirement and Revised Adjustment Factors under its Gas Utility Infrastructure Costs (GUIC) Tariff on April 15, 2019 (April 15 filing) in the above reference docket. The April 15 Filing presented 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. Great Plains requested that the GUIC adjustment rates be made effective October 1, 2019.<sup>1</sup>

However, Great Plains plans to file a general natural gas rate case with a revenue requirement based on a projected 2020 test period on or about September 27, 2019. This general rate case filing will include the GUIC projects for 2019 referenced above as well as the projected 2020 PVC replacement projects that would have been included in the 2020 GUIC filing. In light of the timing of Great Plains' general rate case filing, Great Plains now requests that the Commission approve the 2019 GUIC projects and the associated revenue requirement for those projects as submitted in the Company's April 15 filing. However, the Company requests that the Commission suspend the GUIC adjustment rate coincident with the implementation of interim rates in the upcoming natural gas rate case. Great Plains will be requesting to implement interim rates on January 1, 2020 so that the implementation of interim rates corresponds to the

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<sup>1</sup> The Minnesota Department of Commerce, Division of Energy Resources' (Department) initial comments on Great Plains April 15 Filing are due on September 13, 2019.

start of the test year.<sup>2</sup> This would have the effect of moving the GUIC costs as of December 31, 2019 into interim rates effective January 1, 2020. The suspension of a rate adjustment under the GUIC at the same time interim rates in the upcoming rate case are implemented will ensure that there is no overlap in recovery of the GUIC projects and provide a logical means of moving the GUIC projects through 2020 into base retail rates as part of the rate case.

Finally, Great Plains proposes to true-up for the 2019 revenue requirement and to defer the true-up balance to the subsequent GUIC filing, to be submitted in April 2020, in lieu of a rate adjustment October 1, 2019.

Great Plains has discussed this proposal with the Department and believes this direction is consistent with past practice.

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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<sup>2</sup> The Commission approved a similar request to delay the interim rate implementation until January 1, which is beyond the 60-day requirement under Minn. Stat. § 216B.16, Subd. 3(a) in Great Plains' last natural gas rate case Docket No. G-004/GR15-879.