GREATER MINNESOTA GAS

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September 5, 2025

VIA ELECTRONIC FILING

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

Re: Petition for Change in Contract Demand Entitlement
Docket No. G022/M-25-70

Dear Mr. Bull:

Attached hereto, please find Greater Minnesota Gas, Inc.'s Reply Comments for filing in the above-referenced docket.

All individuals identified on the attached service list have been electronically served with the same.

Thank you for your assistance. Please do not hesitate to contact me should you have any questions or concerns or if you require additional information. My direct dial number is (507) 209-2110 and my email address is kanderson@greatermngas.com.

Sincerely,

GREATER MINNESOTA GAS, INC.

/s/
Kristine A. Anderson
Corporate Attorney

Enclosure
cc: Service List

STATE OF MINNESOTA

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie Sieben	Chair
Hwikwon Ham	Commissioner
Audrey Partridge	Commissioner
Joe Sullivan	Commissioner
John Tuma	Commissioner

MPUC Docket No. G022/M-25-70

PETITION FOR CHANGE IN CONTRACT DEMAND ENTITLEMENT FOR 2025-2026 HEATING SEASON

REPLY COMMENTS

OVERVIEW

Greater Minnesota Gas, Inc. ("GMG") submitted a Petition to the Minnesota Public Utilities Commission ("Commission") requesting approval of its proposed contract demand entitlement for the 2025-2026 heating season on March 31, 2025; and it submitted an Amended Petition on May 30, 2025. The Amended Petition requested that the Commission approve GMG's proposed demand entitlement change which will enable it to provide sufficient safe, reliable, natural gas service to its customers throughout the heating season. On August 28, 2025, the Minnesota Department of Commerce, Division of Energy Resources ("Department") filed Comments of the Minnesota Department of Commerce Division of Energy Resources ("Comments") in response to GMG's Amended Petition. This submission constitutes GMG's Reply to the Department's Comments.

ISSUE SUMMARY

In its Comments, the Department analyzed both GMG's initial Petition and its Amended Petition, making several observations. GMG appreciates the Department's observations and the opportunity to supplement the record in this matter. The Company recognizes that the Department has some questions about its proposed entitlement and addresses them herein. GMG addresses the Department's requests for additional information herein and hopes that it clarifies GMG's proposed contract demand entitlement; hence, the Company provides the following:

- Discussion regarding GMG's proposed overall demand entitlement level, as discussed in Section A of the Comments;
- Analysis of the cost of GMG's 1,000 dekatherm addition reflected in its Amended Petition, as discussed in Section C of the Comments; and,
- Brief discussion of how GMG's sales forecasting methodology does consider any electrification and decarbonization efforts of its customers.

DISCUSSION IN REPLY

GMG appreciates the opportunity to add clarity to the record for consideration of its Amended Petition adding to its contract demand entitlement for the 2025-2026 heating season. GMG is confident that it has secured sufficient capacity to provide reliable firm service to its customers even in the unlikely event of peak day conditions; and, while GMG recognizes that its proposed reserve margin for the coming heating season is higher than normal, GMG remains confident that the totality of the circumstances demonstrates that securing the additional capacity serves the best interests of GMG's customers. GMG believes its proposal provides a balanced approach to meet mutual GMG, Department, and Commission goals while ensuring that GMG's customers are sufficiently protected at reasonable rates.

The Department requested that GMG review its analysis and provide certain additional discussion and information related thereto, and the Department set forth its requests for additional information using corresponding subheadings that appeared in Section III of its Comments. For ease of reference, GMG will incorporate the same references herein.

1. GMG's Proposed Overall Demand Entitlement Level is Both Reasonable and Appropriate, Even Considering the Ongoing Northern Natural Gas Rate Case.

The Department requested that GMG review its analysis and provide certain additional discussion and information related thereto, and the Department set forth its requests for additional information using corresponding subheadings that appeared in Section III of its Comments.

Initially, referring to its discussion in Section III.A.1.2, the Department asked GMG to review its estimate regarding the incremental expense of the additional 500 Dth of SMS, 300 Dth of which is based on a 12-month contract that began June 1st, and that GMG identify when it intends to take service for the remaining 200 Dth of SMS. For the sake of clarity, GMG confirms that the 200 Dth of SMS is for a five-month period from November through March, beginning in November, 2025.

GMG appreciates the Department's review of the SMS incremental expense issue and thanks it for the opportunity to elucidate the record, as facts have evolved since GMG's earlier submissions. The Department's analysis of the SMS expense is correct. SMS provides GMG with an alternative to purchasing swing gas, and SMS is recovered in the commodity component of GMG's purchased gas adjustment ("PGA").

Additionally, referencing its discussion in Sections IIIA.2.1 and 2.2, the Department asked GMG to identify any changes in rates to its existing agreements that are included in its 2025-2026 demand entitlement. GMG did not incorporate any rate changes to its existing agreements in its Amended Petition because, at the time of filing, no rate case had been filed. In July of 2025, Northern Natural Gas ("NNG") submitted a filing to the Federal Energy Regulatory Commission ("FERC") seeking approval of a rate increase of between 85% to 93%, depending on implementation of proposed tariff changes. Hence, the Department also asked GMG to discuss the information that it received from NNG regarding its proposed rate increase and the estimated impact thereof.

GMG's active participation in the NNG rate case occurs through its membership in the Midwest Region Gas Task Force ("MRGTF"), which is comprised of several small regional gas utilities that share the expense of intervening in federal rate cases brought by the interstate pipeline companies. By collaborating through MRGTF, GMG and its other members have a stronger voice and considerably lower legal expenses for the rate case due to their shared nature, which directly benefits GMG's ratepayers and provides an avenue for GMG to try to protect the ratepayers' interests. As a result of its participation in MRGTF, GMG is actively engaged in the NNG rate case and settlement discussions. While GMG appreciates the Department's, and likely the Commission's, interest in the potential impact of NNG's rate case, GMG respectfully submits that any informal settlement discussions that the rate case parties have engaged in are confidential and GMG is not at liberty to disclose the content of the information that it, and other parties, have received from NNG. That said, the history of NNG's relatively frequent rate cases demonstrates that final rates are often considerably lower than those initially requested by NNG. For example, in 2022 NNG sought a 121% rate increase, but the result of settlement was a 32.5% rate increase. FERC's formal settlement discussion process will begin on September 11, 2025, and GMG is hopeful that the result of those discussions will be similar to the last Northern rate case. However, it is impossible to know what the final rates will be, just as it is equally impossible to estimate their likely impact.

2. GMG's Customers Will Not Be Unduly Harmed by Its Proposed Reserve Margin and They Will Benefit From the Additional Capacity that GMG Secured.

In its analysis of GMG's proposed reserve margin, and specifically with respect to the prudence of GMG securing the additional 1,000 Dth of capacity as of June 1st, the Department scrutinized both GMG's historic growth pattern and whether it makes sense to incur costs for additional capacity at this time. The Department stated that it needed additional information to assess the reasonableness of GMG's proposed entitlement and, referring to its discussion in Section III.C.1.2 of its Comments, the Department asked GMG to provide analysis of the costs associated with the additional 1,000 Dth of capacity over time.

At the outset, it is important to note that GMG tried to secure alternate capacity for the 2025-2026 heating season, but it was not successful in doing so. Without at least a portion of the additional 1,000 Dth, which was released capacity, there was a possibility that GMG could have fallen short of the five percent reserve margin required by the Department, particularly if there are severe weather conditions. GMG, a small distribution utility without substantial bargaining power, has learned from experience that relying on the hopeful notion that it can simply obtain incremental capacity from year to year is not a reliable means to maintain compliance with the required reserve margin.

GMG appreciates the Department proposing a framework for measuring the prudence of security additional capacity. In the illustrations discussed below, GMG reflected the worst-case scenario for rate impacts from NNG's rate case by using the full amount of the proposed increase in the interest of being conservative. Of course, the final base cost may be lower if NNG's final rates are less than those proposed, and the ability to release unused capacity on a recallable basis will likely also help offset the cost, but for purposes of a prudence analysis, GMG felt the conservative approach was most appropriate.

The table in Attachment A presents four scenarios, each of which is adjusted for the time value of money to determine a Net Present Value ("NPV"), based on paying for capacity through October, 2032. GMG applied an eight percent discount rate for purposes of the NPV calculation. The first scenario shows the impact of the 1,000 Dth purchase using NNG's current rates. The resulting NPV is $886,772. The second scenario illustrates the rates for the same amount of capacity from the Northern Lights project, which assumes that the CIAC would be paid in December 2025, and the rates would begin in November 2027, with a resulting NPV of $2,241,970. Hence, by securing 1,000 Dth of released capacity, GMG saved its ratepayers $1,355,198 in present value terms.

Similarly, the third scenario shown in Attachment A illustrates the impact of the 1,000 Dth purchase using current NNG rates for 2025 and NNG's proposed rates beginning in 2026, with a resulting NPV of $1,800,799. Finally, the fourth scenario provides the comparison for Northern Lights capacity based on NNG's proposed rates, with a resulting NPV of $2,867,368. That comparison also shows a savings for ratepayers in the amount of $1,066,570 in present value terms.

As review of the comparisons shows, under NNG's current rates, it would take nearly ten years without any capacity release credits to offset the cost of the Northern Lights CIAC. As the Department and the Commission are aware, GMG is relatively aggressive in releasing capacity on a recallable basis. Continuing that path seems likely and will ultimately reduce the cost to ratepayers but, no one can predict whether there will be and/or the impact of capacity releases, so GMG has not factored any such savings into its analysis herein.

Opportunities like that occasioned by the released capacity that allowed GMG to secure the additional 1,000 Dth are infrequent for GMG and, to continue managing its portfolio and provide long-term rate stability for its customers, GMG took the capacity when it was available. Even though it might not all be needed for some time, the Company would have been foolish to let it pass. While the Department's discussion of and table showing GMG's annual customer growth reflects a decrease in recent growth patterns, GMG respectfully submits that the hard numbers do not tell the entire story. The five-year period analyzed includes pandemic years, post-pandemic economic uncertainty, periods of high inflation, and periods of warm weather. Historically, GMG has seen increased demand for bringing gas to unserved areas following cold winters, periods of high costs for alternate fuels, and during times when economic circumstances are more settled. Additionally, since GMG's projects are relatively small, they often come together quickly, often moving from inquiry through design and construction within one year.

History demonstrates that unexpected projects have often resulted in dramatic growth for GMG, making it anomalous among Minnesota's fully regulated gas companies. Each time GMG has the opportunity to secure additional capacity, it considers such an opportunity in the balance of both rate impacts and the potential need for the capacity over the long term to assure that its ratepayers have safe, reliable, affordable natural gas service when they need it most. GMG maintains that securing the additional 1,000 Dth of capacity was both a prudent decision and a wise one.

3. GMG's Sales Forecasting Will Capture the Impact of Any Electrification and/or Decarbonization Efforts Made by Its Customers.

While the Department did not request that GMG provide additional information regarding the impact of electrification and decarbonization efforts, the Comments included a discussion of GMG's responses to assorted information requests regarding the matter. GMG takes this opportunity to clarify that, while it did not specifically adjust its regression analysis, design day forecasts, or sales forecasting to account for electrification and decarbonization efforts, the Company's forecasting process will account for changes in natural gas that may occur from its customers' efforts in that regard. By its very nature, GMG's design day forecasting is predicated on actual use per actual degree day. Hence, to the extent that there are changes in natural gas use that occur from customers' use of heat pumps, efficient appliances, conservation efforts, and similar endeavors, those impacts will show up in the amount of natural gas actually used by GMG's customers. Ergo, they will, necessarily, naturally be accounted for in GMG's design day forecasting. GMG further respectfully posits that continuing to predicate its design day analysis on actual use will provide more accurate information regarding the impacts of electrification and decarbonization than artificially predicting the anticipated impacts when the Company has no real way of knowing what efficiency measures its customers are taking.

REQUEST FOR COMMISSION ACTION

GMG's proposed contract demand entitlement is reasonable and will benefit the interests of GMG's customers, both existing and new. While, at first blush, its reserve margin may appear high, the totality of the circumstances demonstrates the prudence of GMG's proposal. Hence, GMG respectfully requests that the Commission approve its Amended Petition for Change in Contract Demand Entitlement for the 2025-2026 heating season.

Dated: September 5, 2025

Respectfully submitted,
/s/
Kristine A. Anderson
Corporate Attorney
Greater Minnesota Gas, Inc.
1900 Cardinal Lane
Faribault, MN 55021
Phone: 507-209-2110

ATTACHMENT A
Net Present Value Impact of Additional Capacity

Discount Rate
8.0%

1,000 Dth Purchase — Using Current Rates

	Year	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Total	NPV	Formula
Jun 25 - Oct 25	0								$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	**$ 48,380**	$ 48,380	=P8/((1+$R$4)^B8)
Nov 25 - Oct 26	1	$ 18,660	$ 18,660	$ 18,660	$ 18,660	$ 18,660	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	**$ 161,032**	$ 149,104	=P9/((1+$R$4)^B9)
Nov 26 - Oct 27	2	$ 18,660	$ 18,660	$ 18,660	$ 18,660	$ 18,660	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	**$ 161,032**	$ 138,059	=P10/((1+$R$4)^B10)
Nov 27 - Oct 28	3	$ 18,660	$ 18,660	$ 18,660	$ 18,660	$ 18,660	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	**$ 161,032**	$ 127,832	=P11/((1+$R$4)^B11)
Nov 28 - Oct 29	4	$ 18,660	$ 18,660	$ 18,660	$ 18,660	$ 18,660	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	**$ 161,032**	$ 118,363	=P12/((1+$R$4)^B12)
Nov 29 - Oct 30	5	$ 18,660	$ 18,660	$ 18,660	$ 18,660	$ 18,660	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	**$ 161,032**	$ 109,596	=P13/((1+$R$4)^B13)
Nov 30 - Oct 31	6	$ 18,660	$ 18,660	$ 18,660	$ 18,660	$ 18,660	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	**$ 161,032**	$ 101,477	=P14/((1+$R$4)^B14)
Nov 31 - Oct 32	7	$ 18,660	$ 18,660	$ 18,660	$ 18,660	$ 18,660	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	**$ 161,032**	$ 93,961	=P15/((1+$R$4)^B15)
															$ 886,772	

Northern Lights — Using Current Rates

	Year	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Total	NPV	Formula
Jun 25 - Oct 25	0	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	**$ -**	$ -	
Nov 25 - Oct 26	1	$ -	$1,826,000	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	**$ 1,826,000**	$1,690,741	=P21/((1+$R$4)^B21)
Nov 26 - Oct 27	2	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	**$ -**	$ -	=P22/((1+$R$4)^B22)
Nov 27 - Oct 28	3	$ 18,660	$ 18,660	$ 18,660	$ 18,660	$ 18,660	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	**$ 161,032**	$ 127,832	=P23/((1+$R$4)^B23)
Nov 28 - Oct 29	4	$ 18,660	$ 18,660	$ 18,660	$ 18,660	$ 18,660	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	**$ 161,032**	$ 118,363	=P24/((1+$R$4)^B24)
Nov 29 - Oct 30	5	$ 18,660	$ 18,660	$ 18,660	$ 18,660	$ 18,660	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	**$ 161,032**	$ 109,596	=P25/((1+$R$4)^B25)
Nov 30 - Oct 31	6	$ 18,660	$ 18,660	$ 18,660	$ 18,660	$ 18,660	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	**$ 161,032**	$ 101,477	=P26/((1+$R$4)^B26)
Nov 31 - Oct 32	7	$ 18,660	$ 18,660	$ 18,660	$ 18,660	$ 18,660	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	**$ 161,032**	$ 93,961	=P27/((1+$R$4)^B27)
															$2,241,970	

Difference (Northern Lights less 1,000 Dth Purchase) with current rates **$1,355,198**

1,000 Dth Purchase — Using Northern Natural Gas Rate Increase

	Year	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Total	NPV	Formula
Jun 25 - Oct 25	0								$ 9,676	$ 9,676	$ 9,676	$ 9,676	$ 9,676	**$ 48,380**	$ 48,380	=P35/((1+$R$4)^B35)
Nov 25 - Oct 26	1	$ 23,609	$ 23,609	$ 43,682	$ 43,682	$ 43,682	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	**$ 303,585**	$ 281,097	=P36/((1+$R$4)^B36)
Nov 26 - Oct 27	2	$ 43,682	$ 43,682	$ 43,682	$ 43,682	$ 43,682	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	**$ 343,731**	$ 294,694	=P37/((1+$R$4)^B37)
Nov 27 - Oct 28	3	$ 43,682	$ 43,682	$ 43,682	$ 43,682	$ 43,682	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	**$ 343,731**	$ 272,865	=P38/((1+$R$4)^B38)
Nov 28 - Oct 29	4	$ 43,682	$ 43,682	$ 43,682	$ 43,682	$ 43,682	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	**$ 343,731**	$ 252,653	=P39/((1+$R$4)^B39)
Nov 29 - Oct 30	5	$ 43,682	$ 43,682	$ 43,682	$ 43,682	$ 43,682	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	**$ 343,731**	$ 233,938	=P40/((1+$R$4)^B40)
Nov 30 - Oct 31	6	$ 43,682	$ 43,682	$ 43,682	$ 43,682	$ 43,682	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	**$ 343,731**	$ 216,609	=P41/((1+$R$4)^B41)
Nov 31 - Oct 32	7	$ 43,682	$ 43,682	$ 43,682	$ 43,682	$ 43,682	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	**$ 343,731**	$ 200,564	=P42/((1+$R$4)^B42)
															$1,800,799	

*2025 calculations at current rates, 2026 and beyond at proposed T12 Variable Rates

Northern Lights — Using Northern Natural Gas Rate Increase

	Year	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Total	NPV	Formula
Jun 25 - Oct 25	0	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	**$ -**	$ -	
Nov 25 - Oct 26	1	$ -	$1,826,000	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	**$ 1,826,000**	$1,690,741	=P49/((1+$R$4)^B49)
Nov 26 - Oct 27	2	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	**$ -**	$ -	=P50/((1+$R$4)^B50)
Nov 27 - Oct 28	3	$ 43,682	$ 43,682	$ 43,682	$ 43,682	$ 43,682	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	**$ 343,731**	$ 272,865	=P51/((1+$R$4)^B51)
Nov 28 - Oct 29	4	$ 43,682	$ 43,682	$ 43,682	$ 43,682	$ 43,682	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	**$ 343,731**	$ 252,653	=P52/((1+$R$4)^B52)
Nov 29 - Oct 30	5	$ 43,682	$ 43,682	$ 43,682	$ 43,682	$ 43,682	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	**$ 343,731**	$ 233,938	=P53/((1+$R$4)^B53)
Nov 30 - Oct 31	6	$ 43,682	$ 43,682	$ 43,682	$ 43,682	$ 43,682	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	**$ 343,731**	$ 216,609	=P54/((1+$R$4)^B54)
Nov 31 - Oct 32	7	$ 43,682	$ 43,682	$ 43,682	$ 43,682	$ 43,682	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	$ 17,903	**$ 343,731**	$ 200,564	=P55/((1+$R$4)^B55)
															$2,867,368	

*CIAC paid in December 2026 to NNG.

*Rates used are proposed T12 Variable Rates

Difference (Northern Lights less 1,000 Dth Purchase) with NNG proposed rates **$1,066,570**

NOTE: In the Formula references, the "P" refers to the Total column for the respective row, the "$R$4" refers to the cell that reflects the discount rate of 8%, and the "B" refers to the Year column for the respetive row.

CERTIFICATE OF SERVICE

I, Kristine Anderson, hereby certify that I have this day served a true and correct copy of the following document to all persons at the addresses indicated on the attached list by electronic filing and service or by depositing the same enveloped with postage paid in the United States Mail at Faribault, Minnesota, each as shown on the attached list:

Greater Minnesota Gas, Inc.'s Reply Comments
Docket No. G022/M-25-70

filed this 5th of September, 2025.

/s/ Kristine A. Anderson
Kristine A. Anderson, Esq.
Corporate Attorney
Greater Minnesota Gas, Inc.

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	M-25-70
2	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-70
3	Robin	Burke	rburke@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	M-25-70
4	Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	M-25-70
5	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-70
6	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	M-25-70
7	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	M-25-70
8	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	M-25-70
9	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	M-25-70