



202 S. Main Street  
Le Sueur, MN 56058  
Toll Free: (888) 931-3411  
Fax (507) 665-2588  
www.greatermngas.com

December 13, 2018

**VIA ELECTRONIC FILING**

Mr. Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, Minnesota 55101-2147

RE: Annual Automatic Adjustment and True-Up Reports for 2017  
Docket Nos. G999/AA-17-493 and G022/AA-17-630

Dear Mr. Wolf:

Greater Minnesota Gas, Inc. ("GMG") filed its 2017 Annual Automatic Adjustment and True-Up Reports for 2017 on August 24, 2017. The Minnesota Department of Commerce, Division of Energy Resources ("the Department") filed its Comments on December 4, 2018. This letter serves as GMG's Reply, provided in lieu of filing Reply Comments.

GMG appreciates the Department's recommendation that the Commission accept GMG's FYE17 true-up report and allow it to implement the true-up as shown in its AAA report. In addition to its recommendation that the reports be accepted, the Department requested in its Comments that GMG provide additional discussion regarding whether and how the underlying issues that lead to the negative LUF in 2016 have been fully resolved.

GMG has resolved the underlying factors that resulted in the 2016 negative LUF. Automatic meter reading technology has been installed at all of the poultry operations that GMG serves so that meters can be read remotely without the need to enter a biohazard zone. Any future occurrence of a negative LUF will be either due to the slight fluctuations in the level of unbilled sales existing on June 30 each year or new factors that currently do not exist.

Thank you. Please do not hesitate to contact me should there be any questions or concerns.

Sincerely,

GREATER MINNESOTA GAS, INC.

/s/

Kristine A. Anderson  
Corporate Attorney

cc: Service Lists