

From: [MN_PUC_PublicAdvisor](#)
To: [Staff, CAO \(PUC\)](#)
Cc: [Hoena, Paula \(PUC\)](#); [MN_PUC_PublicAdvisor](#); [Bergman, Sasha \(PUC\)](#); [Dornfeld, Tera C \(PUC\)](#); [Nikitas, Sophie \(She/Her/Hers\) \(PUC\)](#); [MacCallum, Casey \(He/Him/His\) \(PUC\)](#)
Subject: RE: Docket G-999/CI-21-565
Date: Tuesday, May 26, 2026 3:25:34 PM
Attachments: [image001.png](#)
[MN_PUC Nat Gas expansion.doc](#)

Hello,

I just talked to Tera, and she suggested the attached letter be filed in the docket (Docket G-999/CI-21-565) as a late comment.

Thanks,

Craig

From: Dave Wager <dave@mnpropane.org>
Sent: Tuesday, May 26, 2026 3:10 PM
To: Bergman, Sasha (PUC) <Sasha.Bergman@state.mn.us>
Cc: Hoena, Paula (PUC) <paula.hoena@state.mn.us>; MN_PUC_PublicAdvisor <publicadvisor.puc@state.mn.us>
Subject: Docket G-999/CI-21-565

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Good afternoon,

Please accept the attached letter in regards to the Docket G-999/CI-21-565 for consideration.

I understand that this is close to the hearing date, but the information provided may benefit the commission members in their decision making process.

Thank you,

Dave Wager

Executive Director

rd

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May 26, 2026

Re: Docket No. G-999/CI-21-565 – Evaluation of Minnesota’s Natural Gas Regulatory Framework

Dear Commission Members:

Thank you for the opportunity to provide comments regarding Minnesota’s ongoing evaluation of its natural gas regulatory framework and future energy infrastructure policies.

As Minnesota continues to pursue a balanced and practical energy transition, it is important that policymakers preserve a diverse portfolio of reliable, affordable, and lower-emission energy options capable of meeting the state’s unique climate and consumer needs. Propane plays an important role in that portfolio today and will continue to do so well into the future.

Reliable Energy for Minnesota’s Climate

Minnesota experiences some of the most severe winter weather conditions in the nation. During periods of prolonged extreme cold, energy reliability is not optional — it is essential for public safety, business continuity, agricultural operations, and household stability.

Propane has a long and proven history of providing dependable heating and energy service throughout Minnesota, particularly in rural, agricultural, and hard-to-serve areas where resiliency and reliability are critically important. Propane systems continue operating during electric outages and peak-demand events and provide consumers with an important source of energy security during emergencies.

Supporting a Diverse and Balanced Energy Future

Minnesota’s future energy system will require multiple technologies and energy sources working together to ensure reliability, affordability, and resiliency. Propane should continue to be recognized as an important part of that balanced approach.

Modern propane applications provide high-efficiency heating, water heating, agricultural drying, backup power generation, transportation fuel options, and emerging renewable propane opportunities. These technologies can complement electrification efforts while helping maintain energy system reliability during periods of high demand or grid stress.

Importantly, propane infrastructure offers flexibility that aligns well with a changing energy landscape. Propane storage systems are modular, portable, and recoverable assets that can be relocated, upgraded, or removed as community energy needs evolve over time.

Protecting Consumers from Long-Term Infrastructure Risk

As Minnesota evaluates future infrastructure investment policies, it is important to carefully consider the long-term financial implications of expanding permanent utility distribution systems during a period of significant energy transition.

Large-scale investments in fixed underground infrastructure may create future financial obligations for ratepayers if portions of those systems become underutilized as technologies, regulations, and consumer preferences evolve.

Propane infrastructure provides a lower-risk alternative in many applications because it does not require permanent underground utility expansion. Propane tanks and associated equipment can simply be removed or repurposed without leaving behind stranded infrastructure assets or imposing long-term recovery costs on future customers.

This flexibility helps protect consumers while allowing communities and homeowners to adapt to future energy developments more efficiently and affordably.

Fairness and Transparency in Energy Infrastructure Investment

As the Commission evaluates future infrastructure policies, it is important to maintain fairness and transparency across Minnesota's energy marketplace.

Unlike utility infrastructure expansion models that distribute system investment costs across a broader ratepayer base, propane infrastructure is generally funded directly through private investment and customer-specific service arrangements. Propane providers do not rely on statewide ratepayer recovery mechanisms to finance distribution infrastructure expansion or long-term asset recovery.

This model creates a direct relationship between infrastructure investment, customer choice, and market accountability. Consumers are able to evaluate energy options based on actual service costs and performance without transferring future financial obligations onto other utility customers.

Maintaining fair and competitive energy markets will help encourage innovation, infrastructure efficiency, and responsible long-term investment decisions while protecting Minnesota consumers from unnecessary future cost burdens.

Affordability and Consumer Value

Energy affordability remains one of the most important considerations for Minnesota households and businesses. Propane continues to provide competitive value for consumers, particularly when

considering the full cost of infrastructure, system expansion, maintenance obligations, and long-term ratepayer exposure.

In many applications, propane can effectively and affordably provide the same heating performance and reliability consumers expect while avoiding the need for significant infrastructure expansion costs. Consumers also benefit from the flexibility and market competition associated with portable fuel systems and independent energy providers.

Maintaining a diverse energy marketplace helps support innovation, consumer choice, and long-term affordability across Minnesota's energy economy.

Conclusion

Minnesota's energy future should prioritize reliability, affordability, resiliency, and responsible long-term infrastructure planning. Propane is uniquely positioned to support those goals while providing consumers and communities with flexible, dependable, and lower-risk energy solutions.

We appreciate the Commission's thoughtful consideration of these important issues and encourage continued policies that support a balanced, consumer-focused energy framework capable of meeting Minnesota's evolving energy needs.

Respectfully submitted,

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