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March 4, 2009

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
Saint Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Office of Energy Security**
Docket No. G011/M-08-1328

Dear Dr. Haar:

Attached are the *Comments* of the Minnesota Office of Energy Security (OES) in the following matter:

A request (*Petition*) by Minnesota Energy Resources Corporation-PNG (MERC-PNG or Company) for approval by the Minnesota Public Utilities Commission (Commission) of a change in demand entitlements on the Northern Natural Gas Co. (Northern) Purchased Gas Adjustment (PGA) system.

The *Petition* was filed on November 1, 2008 by:

Gregory J. Walters
Regulatory and Legislative Affairs Manager
Minnesota Energy Resources Corporation
519 1st Avenue SW
Rochester, MN 55902

Based on its review of MERC-PNG's *Petition*, the OES **withholds** any recommendation on MERC-PNG's total peak day entitlement level proposal until such time that MERC-PNG provides sufficient evidence supporting its total entitlement level proposal. In addition, the OES also **withholds** any recommendation on MERC-PNG's PGA cost recovery proposal until such time that the Company provides sufficient evidence supporting its demand cost calculations and overall cost recovery proposal.

Based on its review, the OES also recommends that MERC-PNG provide the following in its *Reply Comments*:

- a detailed explanation of why its current peak day and design-day requirement calculation approach for its MERC-PNG Northern PGA system, MERC-PNG Great Lakes PGA system, and MERC-NMU PGA system show an increase in the design-day requirement while the same approach results in a decrease in design-day requirements for its MERC-PNG Viking PGA system;

- a re-calculation of the design-day requirement in last year's demand entitlement filing, Docket No. G007/M-07-1405, using MERC-PNG's current design-day methodology;
- data related to the sales volumes the Company uses to estimate its growth rate including any, and all, models and assumptions necessary to replicate the growth rate;
- a full discussion of how the Company handles farm tap customers and whether MERC-PNG classifies farm taps as firm or non-firm customers;
- a full discussion of MERC-PNG's firm system performance during the two recent cold weather events;
- a full discussion of MERC-PNG's interruptible customer tariffs and whether interruptions during the recent cold weather events occurred according to the Company's tariffs;
- the dates that peak usage occurred during each month in the 2008-2009 heating season;
- daily Heating Degree Days and Adjusted Heating Degree Days for each day during the 2008-2009 heating season;
- total daily system throughput for each day during the 2008-2009 heating season;
- total Daily Firm Capacity (DFC) throughput volumes for each day during the 2008-2009 heating season;
- a full discussion of why its total entitlement per customer estimate, that is somewhat less than its all-time peak day sendout per customer, is sufficient to ensure system reliability on a Commission prescribed peak day of -25°F for 24 hours;
- a full explanation of all discrepancies in MERC-PNG *Petition* including, but not limited to, an explanation of why these discrepancies occurred, and which volumes are appropriate to include in the demand entitlement analysis;
- a full discussion of why MERC-PNG continues to recover FDD storage costs through the demand cost recovery portion of the PGA rather than the commodity cost recovery portion; and
- updated exhibits and attachments that show the effects of moving all storage costs to the commodity cost recovery portion of the monthly PGA.

The OES intends to review this information and provide its final recommendations in subsequent comments and is available to answer any questions that the Commission may have.

Sincerely,

/s/ ADAM J. HEINEN
Rates Analyst
651-296-6329

AJH/ja
Attachment



BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA OFFICE OF ENERGY SECURITY

DOCKET NO. G011/M-08-1328

I. SUMMARY OF MERC-NNG'S PROPOSAL

Pursuant to Minnesota Rule 7825.2910, subpart 2 (Filing Upon Change in Demand), on November 1, 2008, Minnesota Energy Resources Corporation-PNG (MERC-PNG or Company), submitted a demand entitlement filing (*Petition*) for its Northern Natural Gas Co. (Northern) Purchased Gas Adjustment (PGA) system.¹ In its *Petition*, MERC-PNG requests the Minnesota Public Utilities Commission's (Commission) approval to change its demand entitlement level. MERC-PNG also requests that the Commission approve the requested changes to be recovered in the PGA effective November 1, 2008.

On November 5, 2008, MERC-PNG submitted revised attachments reflecting corrected information for its Attachment 4, page 1, and Attachment 11. MERC-PNG stated that it had not updated the proposed commodity and demand costs and the revised attachments should replace those in the *Petition*.

II. THE OES'S ANALYSIS OF MERC-PNG'S PROPOSAL

The Minnesota Office of Energy Security (OES) reviewed MERC-PNG's proposed design-day requirement, proposed demand entitlement, and resulting reserve margin. Additionally, the OES compared this year's amounts with previous years' amounts. The OES's analysis of the Company's request includes three parts:

¹ On November 1, 2008, MERC-PNG filed demand entitlement petitions for the 2008-2009 heating season for its Viking Gas Transmission Co. system customers in Docket No. G011/M-08-1331 and for its Great Lakes Transmission, L.P. system customers in Docket No. G011/M-08-1330. In addition, on November 1, 2008, MERC-NMU submitted a request to change demand entitlements in Docket No. G007/M-08-1329.

- MERC-PNG's design-day study;
- demand entitlement analysis; and
- the specific proposed demand entitlement changes.

A. *MERC-PNG'S DESIGN-DAY STUDY*

In its *Petition*, MERC-PNG provides a discussion of the design-day model it uses to determine its design-day requirement. In this discussion, MERC-PNG explains that it uses a design-day process that is different than the methodology that it used in its previous demand entitlement filings. The primary differences between the Company's current and previous design-day process are the data streams it uses and the Company's modified treatment of non-firm customers. In addition, MERC-PNG also discusses smaller adjustments that it makes to its design-day calculations.

In previous demand entitlement filings, MERC-PNG used approximately five heating seasons of data in its design-day regression models, while it uses three heating seasons of data in its current design-day study. Decreases in the amount of data can cause estimative issues that decrease the significance of a regression model; however, MERC-PNG states on pages 9 and 10 of its *Petition* that after examining daily data from three, four, and five heating seasons, it determined that three heating seasons of data provided the best results.

In response to an informal information request in MERC-PNG's 2008-2009 Viking PGA system demand entitlement filing (Docket No. G011/M-08-1331), the Company provided the raw data, various regression model results, and an explanation of the techniques it used to calculate the design-day studies and requirements for each of MERC-PNG's three PGA systems and MERC-NMU's PGA system. In this explanation of the changes in its design-day method, the Company indicates that the large changes in its design-day requirement were due to its new technique that more accurately estimates natural gas usage by interruptible customers during peak periods. Specifically, the Company changed its previous assumption that interruptible customers use the same amount of natural gas every day to a more realistic assumption that natural gas use by interruptible customers varies depending on daily circumstances. Since the design-day requirement estimate is intended to project firm peak day natural gas usage, it is important that interruptible peak day usage is estimated as accurately as possible, since this amount is subtracted from total system throughput.

It is also important to note that when using the same design-day calculation methodology, the Company proposes significant increases in its design-day requirement for its MERC-PNG Northern PGA system, MERC-PNG Great Lakes PGA, and for its MERC-NMU PGA system, while at the same time the Company proposes a significant decrease in the design-day requirement for its MERC-PNG Viking PGA system. Given this occurrence, the OES requests that MERC-PNG provide in its *Reply Comments* a detailed explanation of why its current peak day and design-day requirement calculation approach for its MERC-PNG Northern PGA system,

MERC-PNG Great Lakes PGA system, and MERC-NMU PGA system show an increase in the design-day requirement and the same approach results in a decrease in design-day requirements for its MERC-PNG Viking PGA system.

In its discussion in the *Petition* of its design-day requirement changes, MERC-PNG states that estimating peak day interruptible usage is difficult. The OES agrees with the Company that it is difficult to know with certainty the amount of natural gas used by interruptible customers; therefore, it is necessary to determine whether MERC-PNG's design-day study changes ensure reliable firm customer peak day service. In an effort to validate the Company's modified design-day methodology, the OES recommends that MERC-PNG provide in its *Reply Comments* a recalculation of the design-day requirement in last year's demand entitlement filing, Docket No. G011/M-07-1405, using MERC-PNG's current design-day methodology. This information will help confirm whether the Company's revised method ensures reliable peak day firm service.

As mentioned earlier, MERC-PNG has modified its treatment of non-firm customers in this demand entitlement filing. In previous demand entitlement filings, MERC-PNG estimated daily non-firm usage, and then used the remaining usage amounts (firm usage) to estimate its design-day requirement level. Its current method is different than its old approach in that the Company estimates its design-day requirement, and then uses historical non-firm usage, and telemetry data when available, to remove interruptible volumes from its design-day requirement. After reviewing this approach, the OES believes it may more accurately reflect the amount of natural gas used by interruptible customers on peak days and may decrease variability in design-day estimates. As such, the OES does not dispute the use of this technique.

MERC-PNG also makes smaller adjustments to its design-day calculations. The first of these smaller adjustments is the calculation of its sales growth rates. In previous demand entitlement filings, MERC-PNG used changes in forecasted design-day customer numbers as a proxy for its sales growth rates. In this docket, MERC-PNG instead uses forecasted changes in sales volumes to estimate its growth rate. The Company does not provide these forecasted volumes in its *Petition*; therefore, the OES recommends that MERC-PNG provide these data in its *Reply Comments*, along with any, and all, models, data, and assumptions necessary to replicate the growth rate.

The second smaller adjustment MERC-PNG undertakes relates to its treatment of farm taps. MERC-PNG does not provide a discussion of these changes and, as such, the OES recommends that the Company provide in its *Reply Comments* a full discussion of the changes to the design-day related to these customers and whether MERC-PNG classifies farm taps as firm or non-firm customers.

At the date these *Comments* were filed, MERC-PNG's service territory has experienced two extreme cold weather events during the current heating season, one during December 2008 and one during January 2009. Considering the recent cold weather and the changes in design-day

calculations, the OES recommends that MERC-PNG provide the following in its *Reply Comments*:

- a full discussion of MERC-PNG's firm system performance during the two recent cold weather events during the current heating season;
- a full discussion of MERC-PNG's interruptible customer tariffs and whether interruptions during the recent cold weather events occurred according to the Company's tariffs;
- the dates that peak usage occurred during each month in the 2008-2009 heating season;
- daily Heating Degree Days and Adjusted Heating Degree Days for each day during the 2008-2009 heating season;
- total daily system throughput for each day during the 2008-2009 heating season; and
- total Daily Firm Capacity (DFC) throughput volumes for each day during the 2008-2009 heating season.

B. DEMAND ENTITLEMENT ANALYSIS

1. Design-Day Requirement

The OES investigated MERC-PNG's historical peak day sendout per customer information. OES Attachment 2 shows that the MERC-PNG all-time peak day sendout per design-day customer was 1.5175 Mcf/day during the 1995-1996 heating season.²

As indicated in Columns 4, 5, and 6 of OES Attachment 2, MERC-PNG's proposed design-day requirement increases 23,134 Mcf/day (approximately 11.44 percent) from 202,263 Mcf/day in the 2007-2008 heating season to 225,397 Mcf/day in the 2008-2009 heating season. This proposed change is in the range of percentage changes over the past 18 years: -7.62 percent to 12.72 percent. It is important to note that this is the second largest increase in design-day requirement during this period and is 8.99 percent greater than the average change in design-day requirement of 2.45 percent experienced over the past 18 years.

2. Peak-Day Sendout

As shown in Columns 12, 13, and 14 of OES Attachment 2, MERC-PNG's firm peak day sendout for the 2007-2008 heating season was 182,809 Mcf/day, which is an increase of 21,626 Mcf/day (or approximately 13.42 percent) over the 2006-2007 heating season. The sendout per customer was 1.1646 Mcf per customer, as shown in OES Attachment 2, column 18. The

² Peak day sendout per design-day customer is defined as the usage on a peak day in terms of customer numbers projected prior to the heating season.

Company's proposed design-day requirement increase of 23,134 Mcf/day results in an anticipated design-day per customer of 1.4359 Mcf/day, which is in the range of design-day per customer estimates over the previous 18 years of 1.2923 Mcf/day to 1.5040 Mcf/day and is approximately 0.32 percent higher than the average design-day per customer of 1.4313 Mcf/day.

Further, while the estimated total entitlement per forecasted design-day customer of 1.4447 Mcf/day is slightly greater than the 18-year average entitlement per customer of 1.4388 Mcf/day, it is within the historical range of 1.2170 Mcf/day and 1.5479 Mcf/day. Nonetheless, compared to the all-time peak day sendout per design-day customer of 1.5175 Mcf/day, MERC-PNG's current proposal of 1.4447 Mcf/day is smaller, which indicates that the Company's proposal may not ensure system reliability on a peak day. Therefore, the OES recommends that MERC-PNG provide in its *Reply Comments* a full discussion of why its total entitlement per customer estimate, that is somewhat less than its all-time peak day sendout per customer, is sufficient to ensure system reliability on a Commission prescribed peak day of -25°F for 24 hours.

3. *Entitlement Level and Reserve Margin*

Unlike its design-day proposal, MERC-PNG does not propose an increase in its total entitlement level. The Company indicates in its Attachment 3 that it proposes to keep its total entitlement level constant at 226,785 Mcf/day. As discussed in Section C, the entitlement level changes that MERC-PNG proposes in this docket relate to the movement of volumes among different natural gas contracts.

4. *Conclusion*

Based on its demand entitlement analysis, the OES withholds recommendations on MERC-PNG's proposed design-day requirement, entitlement level, and resulting reserve margin until such time that the Company provides the information discussed above. After reviewing MERC-PNG's *Reply Comments*, the OES expects to provide final recommendations to the Commission on these matters.

C. MERC-PNG'S SPECIFIC PROPOSED DEMAND ENTITLEMENT CHANGES

There are two types of demand entitlement changes. The first type is design-day deliverability which affects the amount, or allocation, of transportation contracts available to MERC-PNG customers during the winter peak period. The second type does not affect design-day deliverability levels, but alters the capacity portfolio and the PGA costs recovered from customers.

1. *Design-Day Deliverability Changes*

As shown in OES Attachment 1 and MERC-PNG Attachment 3, the Company does not propose a change in its total entitlement level. However, MERC-PNG does propose changes in the

allocation of volumes among different delivery contracts. MERC-PNG's proposed changes in portfolio allocation are identified below in Table 1:

Table 1: MERC-PNG's Proposed Changes to its Design-Day Capacity Portfolio	
Capacity Entitlement	Proposed Change Increase/(Decrease)
TF 12B and TF12V	2,792 Mcf/day
TF5	(2,792) Mcf/day
TFX12	10,837 Mcf/day
TFX5	(10,837) Mcf/day
Total Overall Change	0 Mcf/Day

Based on an examination of MERC-PNG's attachments and PGA cost recovery proposal, the OES notes that the above re-allocations are incorrect. Based on its review of MERC-PNG's other attachments, its cost recovery proposal, and information presented in the Company's last demand entitlement filing, the OES presents the following changes below as the appropriate measure of MERC-PNG's re-allocation proposal:

Table 2: MERC-PNG's Proposed Changes to its Design-Day Capacity Portfolio as modified by the OES	
Capacity Entitlement	Proposed Change Increase/(Decrease)
TF12B	(13,952) Mcf/day
TF12V	16,744 Mcf/day
TF5	(2,792) Mcf/day
Total Overall Change	0 Mcf/day

The only difference involves the 10,837 Mcf/day that MERC-PNG states relates to its TFX12 and TFX5 contracts. Based on its review, the OES believes that this entitlement level corresponds to MERC-PNG's TFX7 contract, which is a non-heating season contract that does not affect the total peak day entitlement level. The OES arrives at this conclusion by examining information in the previous demand entitlement filing, the Company's current cost recovery proposal, and Attachment 5 in MERC-PNG's *Petition*. In both of the Company's previous demand entitlement filing, and in its current cost proposal, MERC-PNG lists its TFX7 contract as having a total volume amount of 10,837 Mcf/day.³

Based on the issues discussed above, the OES withholds any recommendation on MERC-PNG's total peak day entitlement level proposal until such time that MERC-PNG provides sufficient evidence supporting its total entitlement level proposal. Therefore, the OES recommends that MERC-PNG provide a full explanation in its *Reply Comments* of all discrepancies in MERC-

³ In addition, when examining its current Attachment 5, if the 10,837 Mcf/day volumes associated with MERC-PNG's TFX7 contract is removed from the TFX12 contract, it equals the same amount for the TFX12 contract as is found in the Company's cost recovery proposal in its Attachment 4. In addition, the OES notes that the total volumes associated with MERC-PNG's TFX5 contract are the same between the Company's cost proposal in its Attachment 4 and the volumes stated in its Attachment 5.

PNG *Petition* including, but not limited to, an explanation of why these discrepancies occurred, and which volumes are appropriate to include in the demand entitlement analysis.

2. *Other Demand Entitlement Changes*

As shown in MERC-PNG Attachment 10 and OES Attachment 1, MERC-PNG proposes to change other pipeline entitlements that are not included in peak-day deliverability. As shown in OES Attachment 1, and Table 3 below, MERC-PNG proposes the following changes to its portfolio of other services.

Other Services	Proposed Change Increase/(Decrease)
FDD Storage Reservation	3,454 Mcf/day
FDD Storage Capacity	36,221 Mcf/day
Tenaska PSO	(170,237) Mcf/day

Based on its review of these other pipeline entitlements, the OES has some concerns with MERC-PNG's cost recovery proposal. After reviewing MERC-PNG's cost recovery proposal provided in its Attachment 4, the OES believes that the Company is treating the cost recovery of its FDD (Firm Deferred Delivery) storage contracts inappropriately. Specifically, Firm Deferred Delivery are storage contracts that allow a utility to withdraw, or inject, natural gas into storage without any prior notice to the pipeline or storage company.

In its March 7, 2008 *Supplemental Comments* in Docket No. G011/M-07-1405, MERC-PNG concluded that it was appropriate to recover storage costs through the commodity costs charged to all customers rather than in demand costs charged only to firm customers since all customers, not just firm customers, benefit from natural gas storage.⁴ In the current docket, when total demand costs are detailed, it is clear that FDD costs are included in these traditional demand costs in the PGA and not the commodity portion of the PGA as recommended by MERC-PNG in Docket No. G011/M-07-1405. This cost recovery proposal contradicts MERC-PNG's statement on pages 4 and 5 of its July 14, 2008 *Reply Comments* in Docket No. G011/M-07-1405 where the Company requests a date of July 1, 2008 to shift these storage costs to the commodity portion of the PGA. The OES also notes that an investigation of MERC-PNG's July 2008 through October 2008 PGAs shows that MERC-PNG has continued recovering FDD storage costs in the demand cost recovery portion of the PGA rather than the commodity cost recovery portion of the monthly PGA. Therefore, the OES recommends that MERC-PNG provide the following in its *Reply Comments*:

⁴ Purchased gas costs passed through the monthly PGAs to customers are classified as either demand-delivered gas costs (demand costs) or commodity-delivered gas costs (commodity costs). Generally, demand costs are recovered from only firm sales service customers and commodity costs are recovered from both firm and interruptible sales service customers. However, both firm and interruptible sales customers use storage gas and both classes receive the benefit of the possible hedge against winter price increases resulting from the use of storage gas.

- a full discussion of why it continues to recover the FDD storage costs through the demand cost recovery portion of the PGA rather than commodity cost recovery portion; and
- updated exhibits and attachments that show the effects of moving the FDD storage costs to the commodity cost recovery portion of the monthly PGA.

3. *PGA Cost Recovery*

MERC-PNG proposes to begin recovering the costs associated with its change in demand costs in the monthly PGA effective November 1, 2008. However, based on an examination of MERC-PNG's cost recovery proposal submitted in its *Petition*, and revised spreadsheets filed on November 5, 2008, the OES notes that the estimated demand costs are not the same. MERC-PNG did not provide support for the change in demand costs with its revised spreadsheets and, as such, the OES is not able to complete its analysis. Therefore, the OES withholds any recommendation on MERC-PNG's PGA cost recovery proposal until such time that MERC-PNG provides sufficient evidence supporting its demand cost changes and cost recovery proposal.

III. CONCLUSIONS AND RECOMMENDATIONS

Based on its review of MERC-PNG's *Petition*, the OES withholds any recommendation on MERC-PNG's total peak day entitlement level proposal until such time that MERC-PNG provides sufficient evidence supporting its total entitlement level proposal. In addition, the OES also withholds any recommendation on MERC-PNG's PGA cost recovery proposal until such time that the Company provides sufficient evidence supporting its demand cost calculations and overall cost recovery proposal.

Based on its review, the OES also recommends that MERC-PNG provide the following in its *Reply Comments*:

- a detailed explanation of why its current peak day and design-day requirement calculation approach for its MERC-PNG Northern PGA system, MERC-PNG Great Lakes PGA system, and MERC-NMU PGA system show an increase in the design-day requirement while the same approach results in a decrease in design-day requirements for its MERC-PNG Viking PGA system;
- a re-calculation of the design-day requirement in last year's demand entitlement filing, Docket No. G007/M-07-1405, using MERC-PNG's current design-day methodology;
- data related to the sales volumes the Company uses to estimate its growth rate including any, and all, models and assumptions necessary to replicate the growth rate;
- a full discussion of how the Company handles farm tap customers and whether MERC-PNG classifies farm taps as firm or non-firm customers;

- a full discussion of MERC-PNG's firm system performance during the two recent cold weather events;
- a full discussion of MERC-PNG's interruptible customer tariffs and whether interruptions during the recent cold weather events occurred according to the Company's tariffs;
- the dates that peak usage occurred during each month in the 2008-2009 heating season;
- daily Heating Degree Days and Adjusted Heating Degree Days for each day during the 2008-2009 heating season;
- total daily system throughput for each day during the 2008-2009 heating season;
- total Daily Firm Capacity (DFC) throughput volumes for each day during the 2008-2009 heating season;
- a full discussion of why its total entitlement per customer estimate, that is somewhat less than its all-time peak day sendout per customer, is sufficient to ensure system reliability on a Commission prescribed peak day of -25°F for 24 hours;
- a full explanation of all discrepancies in MERC-PNG *Petition* including, but not limited to, an explanation of why these discrepancies occurred, and which volumes are appropriate to include in the demand entitlement analysis;
- a full discussion of why MERC-PNG continues to recover FDD storage costs through the demand cost recovery portion of the PGA rather than the commodity cost recovery portion; and
- updated exhibits and attachments that show the effects of moving all storage costs to the commodity cost recovery portion of the monthly PGA.

/ja

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