GREATER MINNESOTA GAS

1900 Cardinal Lane
Faribault, MN 55021
Toll Free: (888) 931-3411
www.greatermngas.com

May 30, 2025

VIA ELECTRONIC FILING

Mr. William Seuffert
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. Seuffert:

Attached hereto, please find Greater Minnesota Gas, Inc.'s Amended Petition for Change in Contract Demand Entitlement for 2025-2026 Heating Season 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

AMENDED PETITION

OVERVIEW

Greater Minnesota Gas, Inc. ("GMG") submits this Amended Petition to the Minnesota Public Utilities Commission ("Commission") to notify the Commission of a change in contract demand entitlement for the 2025-2026 heating season and, more specifically, to note the inclusion of additional firm capacity beginning June 1, 2025. GMG plans to include the rate impact of the additional capacity in GMG's Purchased Gas Adjustments beginning June 1, 2025; and it included the impact of the initially identified additional capacity of April 1, 2025, as set forth in GMG's Petition for Change Contract Demand Entitlement filed on March 31, 2025.

GMG remains committed to ensuring that it secures sufficient capacity to serve its firm customers throughout the heating season while simultaneously safeguarding its ratepayers from paying unduly high amounts for maintaining its reserve. In keeping with its regular practice, GMG employed a combined analytical framework methodology to assess its contract demand entitlement needs that has proven to be sound and to result in appropriate protection for GMG's customers, both in terms of supply and price. As a result of its typical approach to portfolio management and the Department's and Commission's prior requests that GMG seek additional capacity, GMG remains vigilant in seeking opportunities to secure it and GMG was able to secure additional capacity beginning in April 2025, as noted in its initial Petition, as well as additional capacity beginning in June 2025 as discussed herein.

Mere days prior to submitting this Amended Petition, GMG was notified that a shipper turned back capacity on Northern Natural Gas ("Northern"), and it was offered to GMG. As a result, GMG was able to secure the capacity at a much lower cost than it would pay by participating in an open season to secure additional capacity. Therefore, GMG has added 1,000 dekatherms per day of capacity on Northern and 300 dekatherms per day of SMS, both beginning June 1, 2025. GMG recognizes that the additional capacity will increase its reserve margin for the 2025-2026 heating season significantly, and that it will do so to a level that is higher than what the

Commission generally expects. However, when the totality of the circumstances is considered, adding the available capacity now will best serve GMG's rate payers over the long term.

GMG essentially has two primary avenues to secure capacity to serve growth due to customer additions over the next two years. First, GMG can participate in a Northern open season for new capacity, which it has done, having requested 1,000 dekatherms of capacity as part of Northern's 2027 open season, which capacity will be available in November 2027. The current state of that open season request is that Northern is calculating the incremental rates for that expansion. If the rates are above current rates to which GMG committed, GMG has the right to withdraw from the open season. If the rates are at market rates, GMG will participate in the open season and have the option to keep the open season capacity and this capacity or to permanently release some of the capacity if it is not needed. Unfortunately, participation in open seasons when Northern expands is often met with uncertainty. For example, the last capacity that GMG added resulting from a Northern expansion was from its Northern Lights expansion. That capacity finally became available one year later than originally planned due to federal regulatory delays incurred by Northern. Similarly, expansion projects can generate rates that are higher than the standard tariffed rates.

GMG's second option is to take capacity released from an existing shipper at Northern's tariffed rates, as it has done with capacity that will be available on June 1st. GMG believes that this is a better option for its ratepayers, as expansion projects on Northern have all generated higher than tariffed rates in recent years. Additionally, even when bidding on available capacity, GMG has no guarantee of a capacity award. Earlier this year, 300 dekatherms of capacity became available on Northern's auction bulletin board. GMG submitted a bid and was awarded 60 dekatherms of the capacity, which is the additional capacity reflected in GMG's original Petition. With respect to the June 1st capacity, GMG does not have the uncertainty borne of participating in the Northern auction queue, because the shipper is releasing the capacity directly to the Company and GMG will receive the full 1,000 dekatherms for its customers. GMG was an attractive option for the releasing shipper because it was willing to take the capacity on June 1 and was also willing to take the 300 of SMS. That additional SMS will simply offset some of GMG's planned addition of SMS as reflected in its initial Petition, so the total addition of 500 dekatherms of SMS remains consistent therewith. Notably, in months when GMG is not using the additional capacity, it will likely release the capacity on a recallable basis, which helps to offset the cost of acquiring the capacity. While GMG recognizes that, at first blush, adding additional capacity on June 1st may not appear to make sense, it is important to remember that GMG cannot predict whether release capacity will be available in the future, nor can it predict the cost for capacity in future Northern Open Season requests. Securing the capacity now, while it is available, at rates that are likely lower than future Open Season rates, protects GMG's rate payers over the long term and is in accordance with GMG's historical approach to portfolio management.

GMG still anticipates that it will informally review its projections, demand entitlement, and reserve margin immediately prior to the heating season to ensure that adequate capacity will be available to meet projected peak day demand and design day conditions; but, given the additional

capacity being acquired in June, it is extremely unlikely that an additional adjustment of its contract demand request will be necessary in the fall of 2025.

Minnesota Rule 7825.2910 Subp. 2 requires GMG to assess four areas when requesting a change in demand entitlement, namely: the factors contributing to the need for changing demand; GMG's design day demand analysis; a summary of GMG's customers' winter and summer usage for all customer classes; and a description of GMG's design day gas supply from all sources under its proposed level. This Amended Petition addresses each of the requisite areas based on GMG's analysis of its current customer usage and patterns, the impact of GMG's current and anticipated growth on the 2025-2026 heating season, and forecasting the size and expected load of new and recently acquired customers.

DISCUSSION

A review of GMG's demand entitlement filings in recent years shows both those that included substantial changes as a direct result of the Company's growth and, more recently, slower growth; however, all reflected minimal rate impact due to utilization of GMG's balanced supply portfolio and proactive actions to protect its customers. In recent history, GMG has successfully addressed both a narrow reserve margin and the uncertainty of predictive modeling for conversion customers by adjusting its reserve margin accordingly. GMG's proactive portfolio management and its increased customer base coupled to prevent adverse rate impacts on GMG's ratepayers despite GMG purchasing increased reserve capability. GMG has continued to leverage its growth and portfolio management to successfully employ purchasing strategies that increased its reserve capability without resulting in a substantial rate impact, even during the uncertainty and price spikes related to weather events and inflationary impacts. GMG's reserve margin has consistently been sufficient to ensure that its customers' needs were satisfied through the duration of the heating season, including on unseasonably cold days and during severe weather events. GMG's supply portfolio changes assured and will continue to assure reliable firm supply for its customer base. Similarly, GMG's holistic and proactive approach to securing capacity when it becomes available at reasonable rates supports those assurances and promotes price stability during unplanned events. GMG's additional capacity as reflected herein continues to serve those ends, and the June 1st capacity dovetails nicely with GMG's philosophy in that regard.

GMG's analysis of its needs for the 2025-2026 heating season is based on its projected demand requirements and its portfolio changes. GMG again employed a combination of analytical tools to balance the competing components of maintaining a sufficient reserve and maintaining reasonable customer rates in assessing its demand entitlement needs for the 2025-2026 heating season. By combining statistical regression analysis based on its existing customer data, a separate mathematical analysis, projected growth information, and budget year analysis, GMG's current proposed demand entitlement is again soundly supported by the underlying data, attached hereto and incorporated by reference.

GMG seeks an adjustment of its total demand entitlement as follows:

Entitlement for 2024-2025 (Dth)	Proposed Entitlement for 2024-2025 (Dth)	Entitlement Change (Dth)	% Change From Previous Year
20,108	21,168	1,060	5.27%

1. **GMG's Proposed Demand Entitlement Reflects Growth in Its Portfolio, Anticipated Customer Needs, and Assurance of Its Ability to Maintain an Adequate Reserve Margin Throughout the Heating Season Without Substantially Impacting Customer Rates.**

An increase in demand entitlement is requested by GMG to enable it to continue to secure sufficient reserve to meet its customers' needs. GMG's reserve margins over the last several years have satisfactorily balanced the necessity of a sufficient reserve margin with protection for its ratepayers from an unreasonable reserve cost. The Department previously noted that the OES generally uses a gauge of five percent to determine the appropriateness of a company's reserve margin; and the Commission's order in Docket No. G022/M-20-391 requires GMG to maintain a minimum reserve margin of 5% on a go-forward basis for the heating seasons. Historically, the Commission has approved higher reserve margins for GMG based on the totality of the circumstances. GMG agrees that utilizing a conservative approach when allocating a reserve margin is appropriate. GMG believes that maintaining its reserve margin at a conservative level continues to be prudent. GMG has once again utilized its portfolio in a manner that allows its reserve margin to be maintained without undue cost burdening its ratepayers, as well as allowing it to leverage proactive opportunities to protect its ratepayers in the long-term. Similarly, the addition of the new capacity – both that initially identified and that giving rise to this Amended Petition – will allow GMG to continue to do so. GMG's proposed demand entitlement results in a nominal increase in demand costs and, thus, in customer rates, but the impact is not substantial on individual customers. GMG's newly proposed reserve margin for the 2025-2026 heating season is 17.31%; and, as explained herein, it provides additional long-term stability for GMG's customers.

GMG's predictive modeling calculations reflect a need for a change in its design day entitlement. The table below summarizes GMG's most recent design day and reserve calculations:

Planned Customer Base for 2025-2026 Heating Season	
Design Day Requirement (Attachment A, Page 2 of 8, line 10)	18,045
Reserve Margin of 17.31%	3,123
Design Day Requirement With 17.31% Reserve Margin	21,168

GMG recognizes that its Design Day Requirement differs from that submitted in its initial Petition. Since that Petition was filed in March, the customer data employed in GMG's analysis went through February 2025. However, for this Amended Petition, GMG was able to include customer data through March 2025, thus giving rise to the changed requirement. The ultimate

objective of a design day analysis is to forecast anticipated firm customer demand at design temperatures to predict the necessary level of firm resources to sufficiently serve customers in the unlikely event that design day weather occurs. To meet that objective but still balance it against the desire to protect ratepayers from paying for too much reserve, an increase in GMG's contract demand entitlement is appropriate.

2. GMG's Design Day Analysis Ensures Viable Forecasting Given Available Customer Data and Appropriate Predictive Information.

GMG's current design day projection is based on a two-stage process whereby it analyzed two separate econometric models to forecast its supply needs for the 2025-2026 heating season: one based on statistical regression, and one based solely on mathematics without interpretation. Consistent with previous Commission directives and Department requests, GMG employed both a regression model separating residential and commercial customers' needs and a mathematical model in its design day analysis. GMG incorporated three years of heating season data into its regression analysis.[1]

Statistical Regression Analysis Based on Historic Data

For its statistical modeling, GMG employed an ordinary least square regression analysis methodology to predict peak day demand, as it has done for many years. As discussed herein, GMG ultimately relied on a regression based on the bulk of three heating seasons of data. GMG believes that its complete analysis provides a result that will adequately protect GMG's customers should design day weather conditions occur. GMG's regression analysis is predicated on a 90-heating-degree day as its basis, based on an average design day temperature of -25°F. GMG's design day forecast for its existing customers for the 2025-2026 heating season is based on 18,045 dekatherms, which is a decrease of 873 dekatherms from GMG's 2024-2025 design day requirements. The derivation of the separated class regression design day forecast can be seen in Attachment A, Pages 2 through 5 of 8.

Attachment A details the regression analysis calculations upon which GMG's contract demand entitlement petition is based, insofar as it relates to its existing customers and quantitative historical data. In conducting its least square regression analysis, GMG employed the following methodology:

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[1]. GMG did not incorporate November usage data into its regression analysis in order to provide the most meaningful result for purposes of predictive demand entitlement modeling. GMG generally has a substantial amount of grain drying use in November and the grain drying load is unpredictable from year to year. Incorporating the grain drying load into its regression would skew the analysis in such a way that it would result in modeling suggesting that a much higher entitlement and reserve would be necessary to protect customers throughout the heating season. That would ultimately result in an unreasonable burden on customer rates by requiring them to pay for far too much reserve than what is needed as a practical matter.

Data is provided for residential customers and for commercial customers. Each analysis was completed in the same fashion, by using historical firm sales volume data and actual temperature data for the heating season periods from December 2022 through March 2025 for the reasons discussed above. The firm sales volume data was correlated to geographic weather data for each of GMG's three service territories, separating regression data for its northern, central, and southern districts.

Employing widely accepted statistical analysis, a linear equation was derived from the linear regression model that was used to calculate the design day usage per customer. For each regression group, the forecasted number of firm customers for the 2025-2026 heating seasons was then multiplied by the design day usage per customer to derive the design day requirements.

The linear regression models the linear relationship between heating degree day data and firm customer natural gas usage by fitting a linear equation to observed data. The linear regression line has an equation of the form:

$$\boldsymbol{Y = a + b\,X}$$

Where X (Heating Degree Days) is the explanatory variable and Y (Firm Sales Volume) is the dependent variable. The slope of the line is b, and a is the intercept (Firm Non-Temp Sensitive Volume).

The strength of the linear association is quantified by the correlation coefficient. The correlation coefficient takes a positive value between 0 and 1, with 1 indicating perfect correlation (all points would lay along a straight line in this case). A correlation value close to 0 indicates no association between the variables. The formula for computing the correlation coefficient is given by:

$$r = \frac{1}{n-1} \Sigma \left(\frac{x - \overline{x}}{s_x} \right) \left(\frac{y - \overline{y}}{s_y} \right)$$

The reliance on accepted statistical modeling methodology to obtain quantitative data for forecasting purposes is intended to mitigate discrepancies between actual resource utilization and planned supply needs. Hence, GMG has attempted to secure all available information to gauge likely customer sendout during a design day weather occurrence.

GMG attempts to adequately predict growth; however, it does use a conservative approach. Nonetheless, as GMG's prior demand entitlement submissions have demonstrated, GMG's design day modeling, taken in its entirety, has been appropriate. Empirical evidence suggests that, when GMG brings natural gas to a previously unserved area, many new customers ultimately avail themselves of the benefits that come with converting to gas use. Hence, sometimes actual throughput exceeds forecasted needs. However, when weather is unseasonably

warm and/or propane prices are low and/or there are significant public concerns about the economy and inflation, new customers wait longer to convert to natural gas usage. Conversely, when the weather is very cold, customer usage patterns can be erratic and may vary from traditional usage patterns. Since such anomalies are unpredictable, they, too, can impact actual throughput. Such phenomena support GMG's continued use of its proven approach.
To provide a well-rounded analysis and as previously recommended by the Department, GMG also utilized a mutually exclusive mathematical analysis based on actual throughput for its all-time peak use per customer sendout, which occurred on a day which was very near to design day conditions, as a separate modeling tool for a second stage in its design day analysis, which appears below.

Mathematical Analysis Based on All-Time Peak Use Per Customer

GMG's all-time peak day usage of 1.585 dekatherms per customer occurred on January 29, 2019. GMG applied a mathematical analysis that shows an estimated peak day requirement based on GMG's all-time high peak day usage and 2025-2026 customer additions, as shown below.

Mathematical Peak Day Analysis	
	All-Time Peak Use Per Customer
Actual Peak Day Throughput for All-Time Peak Day Use Per Customer (1/29/2019)	13,323
/ Customer Count on Peak Day	8,501
= Use Per Customer on Peak Day	1.567
x Adjustment for 90 HDD	90/89
Estimated Peak Day Usage Per Customer if 90 HDD	1.585
Additional Customers	
x Total Anticipated Customer Count	11,614
= Total Projected Peak Day Requirement	18,406
Proposed Contract Demend Entitlement	21,168
Reserve Margin	2,762
Reserve Margin %	15.00%

A pure mathematical analysis based on GMG's all-time peak day use suggests that, in the extraordinary event that historical peak day usage conditions occur during the 2025-2026 heating season, GMG will have a sufficient reserve margin. GMG's all-time peak use per customer is a less anomalous indicator than others because the actual weather conditions were nearly identical to design day conditions; hence, the use per customer is likely a more accurate indicator. That is precisely the rationale for GMG's use of multiple analytical frameworks when calculating its contract demand. Both the mathematical analysis based on empirical data from prior customer

use on peak days and regression models that factor in weather conditions and customer use patterns support GMG's proposed contract demand entitlement. Additionally, GMG notes that it anticipates a lower peak day usage per customer in the coming heating season because, since GMG's peak usage date was reached, the bulk of GMG's new customers have been and are anticipated to be primarily residential for the coming year. GMG's proposal optimally balances between securing sufficient reserve for the 2025-2026 heating season, acquiring additional permanent capacity at a cost-effective rate, and protecting customers from unnecessary rate impacts.

3. The Summary of Winter Versus Summer Usage for All GMG Customer Classes Supports a Change in Demand Entitlement.

A summary of GMG's customer usage for both the winter and summer seasons is provided below, broken down by customer class. The summary is based on usage for the twelve-month period ending December 31, 2024.[2]

Seasonal Customer Usage by Class (Dth)			
	Winter	**Summer**	**Total**
Residential - Firm	586,215	215,458	801,674
Commercial - Firm	26,017	10,919	36,936
Industrial - Firm	229,419	103,897	333,316
Flexible Rate - Firm	0	0	0
Total Firm	*841,651*	*330,274*	*1,171,925*
Agricultural - Interruptible	*30,680*	*26,812*	*57,492*
Industrial - Interruptible	17,976	23,369	41,345
Flexible Rate - Interruptible	0	0	0
Total Interruptible	*17,976*	*23,369*	*41,345*
Total	890,307	380,455	1,270,762

GMG's proposed change in its contract demand entitlement will continue to ensure sufficient supply and reliability for its customers throughout the heating season. GMG's contract arrangements secure supply for both the summer months and the winter months to sufficiently serve its firm customer base throughout the year. GMG's proposal strikes the ideal balance for both cost and efficiency protections for its customers.

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[2]. GMG notes that previous demand entitlement dockets filed during the second half of the year incorporated data for the twelve-month period ending June 30th of the filing year. However, since this Amended Petition is being submitted prior to June 30th, GMG utilized seasonal customer usage data for the 2024 calendar year.

4. The Anticipated Design Day Gas Supply is in the Best Interest of Ratepayers Because it Provides for an Adequate Reserve Margin While Minimizing the Rate Impact.

GMG recognizes that the primary concerns of the Commission and the Department regarding natural gas distribution companies are sufficient assurance of reliability and reasonable rates for customers. It is critical that GMG be fully prepared to provide enough firm supply to meet its customers' needs; and, given GMG's size, long-term planning is vital if it is to meet that objective. To assure that it can meet all of its customers' needs throughout the year, GMG's proposal provides a balanced portfolio based on an integrated system now and into the future. To that end, GMG has secured a variety of gas supply sources. In keeping with its continued commitment to act in its customers' best interests, GMG was able to advance its portfolio development by securing additional suitable long-term capacity. GMG's use of proactive, cost-effective options contributes to its ability to protect its customers from potentially volatile and increased gas costs.

A summary of GMG's demand profile shows the changes in GMG's supply sources, as compared to the supply sources for the two previous heating seasons, as seen in Attachment B. GMG is primarily served by the Northern Natural Gas and Viking Gas Transmission pipeline systems. Attachment C identifies the contracts GMG holds with its sources and it also specifically notes proposed change to its contracts for the 2025-2026 heating season and the corresponding change in contract demand costs. As illustrated by Attachment C, GMG was able to secure additional permanent capacity from Northern Natural Gas at cost-effective rates. The result is improved capacity and rates for GMG's customers over the long-term. GMG respectfully requests that the Commission approve inclusion of the associated demand entitlement costs effective April 1, 2025, and June 1, 2025, respectively. GMG will incorporate the charges in its PGA pending Commission approval.

GMG's supply contract scheme is designed so that gas can be delivered to alternate points and can be used elsewhere in GMG's integrated system, if necessary, at any given time. Thus, GMG could move supply throughout its service area on a day-to-day basis as market demand and supply options dictate. Similarly, if GMG does not plan to use all of its available capacity, it can release capacity on a recallable basis.

Attachment D provides a summary of the rate impact on firm customers including the contract changes as of April 1, 2025 and the total impact of all additional capacity as of June 1, 2025. It demonstrates that GMG's customers will experience a small increase in cost due to GMG's supply portfolio changes; however, the change does not result in a substantial impact. The lack of a discernable adverse impact on customer rates resulting from the increased demand entitlement further supports its approval.

REQUEST FOR COMMISSION ACTION

GMG's proposed change in contract demand entitlement serves the best interests of its customers. As the supporting information demonstrates, GMG coordinated its gas-supply planning for the 2025-2026 heating season alongside consideration of previous Department and Commission concerns and recommendations and its broader corporate planning. GMG's proposal strikes the appropriate balance between assuring physical reliability with sufficient supply to serve all customers now and into the future if design day weather occurs with minimizing the rate impact of maintaining a sufficient reserve on GMG customers. Therefore, GMG respectfully requests that the Commission approve its Amended Petition for Change in Contract Demand Entitlement for the 2025-2026 heating season.

Dated: May 30, 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
Design Day Regression Analysis Background Information

	Number of Sales Firm Customers			Design Day Requirement			Total Entitlement + Storage + Peak Shaving			Reserve Margin
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Heating Season	Number of Customers	Change from Pervious Year	% Change from Previous Year	Design Day (Dth)	Change from Pervious Year	% Change from Previous Year	Total Entitlement (Dth) 1/	Change from Pervious Year	% Change from Previous Year	% of Reserve Margin [(7)-(4)]/(4)]
2025-2026(Estimate)	11,614	500	4.62%	18,045	-873	-4.61%	21,168	1,060	5.27%	17.31%
2024-2025(3/31/25)	11,114	303	2.80%	18,918	1,846	10.81%	20,108	1,000	5.23%	6.29%
2023-2024 (2/29/2024)	10,811	397	3.81%	17,072	1,105	6.92%	19,108	1,500	8.52%	11.93%
2022-2023 (1/31/2023)	10,414	443	4.44%	15,967	610	3.97%	17,608	0	0.00%	10.28%
2021-2022 (2/2022)	9,971	453	4.76%	15,357	298	1.98%	17,608	2,000	12.81%	14.66%
2020-2021 (2/14/21)	9,518	455	5.02%	15,059	815	5.72%	15,608	333	2.18%	3.65%
2019-2020 (2/13/20)	9,063	562	6.61%	14,244	1,540	12.12%	15,275	1,166	8.26%	7.24%
2018-2019 (1/29/19)	8,501	591	7.47%	12,704	755	6.32%	14,109	1,500	11.90%	11.06%
2017-2018 (12/31/17)	7,910	532	7.21%	11,949	1,131	10.45%	12,609	-750	-5.61%	5.52%
2016-2017 (1/31/17)	7,378	735	11.06%	10,818	-308	-2.77%	13,359	850	6.80%	23.49%
2015-2016 (1/31/16)	6,643	791	13.52%	11,126	2,157	24.05%	12,509	2,850	29.51%	12.43%
2014-2015 (2/28/15)	5,852	547	10.31%	8,969	904	11.21%	9,659	300	3.21%	7.69%
2013-2014 (1/31/14)	5,305	531	11.12%	8,065	3,101	62.47%	9,359	4,150	79.67%	16.04%
2012-2013	4,774	558	13.24%	4,964	273	5.83%	5,209	165	3.27%	4.94%
2011-2012	4,216	319	8.19%	4,691	241	5.41%	5,044	0	0.00%	7.54%
2010-2011	3,897	175	4.70%	4,450	796	21.79%	5,044	500	11.00%	13.35%
2009-2010	3,722	162	4.55%	3,654	-628	-14.67%	4,544	300	7.07%	24.36%
2008-2009	3,560	182	5.39%	4,282	566	15.23%	4,244	244	6.10%	-0.89%
2007-2008	3,378	170	5.30%	3,716	166	4.68%	4,000	350	9.59%	7.64%
2006-2007	3,208	237	7.98%	3,550	750	26.79%	3,650	350	10.61%	2.82%
2005-2006	2,971	290	10.82%	2,800	255	10.02%	3,300	300	10.00%	17.86%
2004-2005	2,681	336	14.33%	2,545	545	27.25%	3,000	600	25.00%	17.88%
2003-2004	2,345	181	8.36%	2,000	-200	-9.09%	2,400	-200	-7.69%	20.00%
2002-2003	2,164	300	16.09%	2,200	400	22.22%	2,600	400	18.18%	18.18%
2001-2002	1,864	301	19.26%	1,800	400	28.57%	2,200	500	29.41%	22.22%
2000-2001	1,563	393	33.59%	1,400	300	27.27%	1,700	300	21.43%	21.43%
1999-2000	1,170	279	31.31%	1,100	250	29.41%	1,400	150	12.00%	27.27%
1998-1999	891	289	48.01%	850	350	70.00%	1,250	750	150.00%	47.06%
1997-1998	602	339	128.90%	500	200	66.67%	500	200	66.67%	0.00%
1996-1997	263	263		300			300			
Average per Year:	5,245	387	15.61%	7,436	612	16.76%	8,282	720	18.63%	13.77%

	Firm Peak Day Send out						
	(11)	(12)	(13)	(14)	(15)	(16)	(17)
Heating Season	Firm Peak Day Send out (Dth)	Change from Pervious Year	% Change from Previous Year	Excess per Customer [(7)-(4)]/(1)	Design Day per Customer (4)/(1)	Entitlement per Customer (7)/(1)	Peak Day Send out per Customer (11)/(1)
2025-2026(Estimate)	*Unknown*			0.269	1.5537	1.8226	*Unknown*
2024-2025(1/20/25)	*15,139*	2,128	16.36%	0.107	1.7022	1.8092	1.3622
2023-2024 (1/13/24)	13,011	-756	-5.49%	0.188	1.5791	1.7675	1.2035
2022-2023 (12/22/22)	13,767	1,156	9.17%	0.158	1.5332	1.6908	1.3220
2021-2022 (1/6/22)	12,611	288	2.34%	0.226	1.5402	1.7659	1.2648
2020-2021 (2/14/21)	12,323	634	5.42%	0.058	1.5822	1.6398	1.2947
2019-2020 (2/13/20)	11,689	-1,634	-12.26%	0.114	1.5717	1.6854	1.2897
2018-2019 (1/29/19)	13,323	2,963	28.60%	0.165	1.4944	1.6597	1.5672
2017-2018 (12/31/17)	10,360	1,114	12.05%	0.083	1.5106	1.5941	1.3097
2016-2017 (1/5/17)	9,246	-249	-2.62%	0.344	1.4663	1.8107	1.2532
2015-2016 (1/17/16)	9,495	1,126	13.45%	0.208	1.6748	1.8830	1.4293
2014-2015 (2/18/15)	8,369	489	6.21%	0.118	1.5326	1.6505	1.4301
2013-2014 (1/6/14)	7,880	2,855	56.82%	0.244	1.5203	1.7642	1.4854
2012-2013	5,025	1,368	37.41%	0.051	1.0398	1.0911	1.0526
2011-2012	3,657	-248	-6.35%	0.084	1.1126	1.1964	0.8674
2010-2011	3,905	251	6.87%	0.152	1.1419	1.2943	1.0021
2009-2010	3,654	-374	-9.29%	0.239	0.9817	1.2208	0.9817
2008-2009	4,028	-72	-1.76%	-0.011	1.2028	1.1921	1.1315
2007-2008	4,100	550	15.49%	0.084	1.1001	1.1841	1.2137
2006-2007	3,550	738	26.24%	0.031	1.1066	1.1378	1.1066
2005-2006	2,812	285	11.28%	0.168	0.9424	1.1107	0.9465
2004-2005	2,527	185	7.90%	0.170	0.9493	1.1190	0.9426
2003-2004	2,342	587	33.45%	0.171	0.8529	1.0235	0.9987
2002-2003	1,755	747	74.11%	0.185	1.0166	1.2015	0.8110
2001-2002	1,008	-180	-15.15%	0.215	0.9657	1.1803	0.5408
2000-2001	1,188	291	32.44%	0.192	0.8957	1.0877	0.7601
1999-2000	897	95	11.85%	0.256	0.9402	1.1966	0.7667
1998-1999	802	397	98.02%	0.449	0.9540	1.4029	0.9001
1997-1998	405	233	135.47%	-	0.8306	0.8306	0.6728
1996-1997	172	172					
Average per Year:	6,388	535	21.00%	0.159	1.2407	1.3997	1.1038

Notes:
1/ Total Entitlement = Total Contract Entitlement - Non-Recallable Capacity Release

Greater Minnesota Gas, Inc.
Design Day: Heating Season 2025 - 2026
Derivation of Design Day Use Per Customer
Total Company

Linear Regression Analysis Period: December 2022 thru March 2025

Line No.	Customer Type	Weather Area	Non- Heat Sensitive (Y Intercept)	Use Per HDD (Slope)	Design HDD	Estimated Design Dths	Regression Coefficient	Equation
1	Residential	All Areas	220.74	106.67	90	9,821	0.9283	Y Inter + Slope x Design HDD = Estimated Design Dth
2	Firm Commercial	All Areas	69.97	66.60	90	6,064	0.9349	
			290.71	173.27				
3				**Total Design Dths**		**15,885**		Line 1 + Line 2
4				**Estimated Interruptible Load**		**0**		
5				**Net Design Dths**		**15,885**		Line 3 - Line 4
6				**Customer Count 3/31/2025**		**11,114**		
7				**Design Dths/Customer**		**1.4293**		Line 5 / Line 6
8				**Actual Results Design Dths/Customer**		**1.5537**		
9				**Estimated Firm Customers for 2025/2026**		**11,614**		
10				**Design Dths 2025/2026**		**18,045**		Line 8 x Line 9

Greater Minnesota Gas, Inc.
Design Day: Heating Season 2025 - 2026
Derivation of Design Day Use Per Residential Customer
Southern District

Linear Regression Analysis Period: December 2022 thru March 2025

Line No.	Customer Type	Weather Area	Non- Heat Sensitive (Y Intercept)	Use Per HDD (Slope)	Design HDD	Estimated Design Dths	Regression Coefficient	Equation
1	Residential	Southern MN	-140.80	81.67	90	7,210	0.9284	Y Inter + Slope x Design HDD = Estimated Design Dth
2	Firm Commercial	Southern MN	-49.85	31.61	90	2,795	0.9197	
			-190.64	113.28				
3				**Total Design Dths**		**10,005**		Line 1 + Line 2
4				**Estimated Interruptible Load**		**0**		
5				**Net Design Dths**		**10,005**		Line 3 - Line 4
6				**Customer Count 3/31/2025**		**8,046**		
7				**Design Dths/Customer**		**1.2434**		Line 5 / Line 6
8				**Actual Results Design Dths/Customer**		**1.5537**		
9				**Estimated Firm Customers for 2025/2026**		**8,379**		
10				**Design Dths 2025/2026**		**13,018**		Line 8 x Line 9

Greater Minnesota Gas, Inc.
Design Day: Heating Season 2025 - 2026
Derivation of Design Day Use Per Residential Customer
Central District

Linear Regression Analysis Period: December 2022 thru March 2025

Line No.	Customer Type	Weather Area	Non- Heat Sensitive (Y Intercept)	Use Per HDD (Slope)	Design HDD	Estimated Design Dths	Regression Coefficient	Equation
1	Residential	Central MN	53.68	7.44	90	723	0.9145	Y Inter + Slope x Design HDD = Estimated Design Dth
2	Firm Commercial	Central MN	240.10	21.29	90	2,156	0.8942	
			293.77	28.72				
3				**Total Design Dths**		**2,879**		Line 1 + Line 2
4				**Estimated Interruptible Load**		**0**		
5				**Net Design Dths**		**2,879**		Line 3 - Line 4
6				**Customer Count 3/31/2025**		**1,077**		
7				**Design Dths/Customer**		**2.6732**		Line 5 / Line 6
8				**Actual Results Design Dths/Customer**		**1.5537**		
9				**Estimated Firm Customers for 2025/2026**		**1,089**		
10				**Design Dths 2025/2026**		**1,692**		Line 8 x Line 9

Greater Minnesota Gas, Inc.
Design Day: Heating Season 2025 - 2026
Derivation of Design Day Use Per Residential Customer
Northern District

Linear Regression Analysis Period: December 2022 thru March 2025

Line No.	Customer Type	Weather Area	Non- Heat Sensitive (Y Intercept)	Use Per HDD (Slope)	Design HDD	Estimated Design Dths	Regression Coefficient	Equation
1	Residential	Northern MN	-60.16	20.68	90	1,801	0.9120	Y Inter + Slope x Design HDD = Estimated Design Dth
2	Firm Commercial	Northern MN	-35.06	4.53	90	372	0.8364	
			-95.22	25.21				
3				**Total Design Dths**		**2,173**		Line 1 + Line 2
4				**Estimated Interruptible Load**		**0**		
5				**Net Design Dths**		**2,173**		Line 3 - Line 4
6				**Customer Count 3/31/2025**		**1,991**		
7				**Design Dths/Customer**		**1.0916**		Line 5 / Line 6
8				**Actual Results Design Dths/Customer**		**1.5537**		
9				**Estimated Firm Customers for 2025/2026**		**2,146**		
10				**Design Dths 2025/2026**		**3,334**		Line 8 x Line 9

Greater Minnesota Gas, Inc.
Peak Day Analysis

Line No.	Description	Design Day Calculation	Peak Day 2024-25	Peak Day 2023-24	Peak Day 2022-2023	Peak Day 2021-2022	Peak Day 2020 - 21	Peak Day 2019 - 20	Peak Day 2018 - 19	Peak Day 2017 - 18
1	Date of Peak Day		1/20/2025	1/13/2024	12/22/2022	1/6/2022	2/14/2021	2/13/2020	1/29/2019	12/31/2017
2	Day of the Week		Monday	Saturday	Thursday	Thursday	Sunday	Thursday	Tuesday	Sunday
3	Total Throughput (Dth)	18045	15139	13011	13767	12611	12323	11689	13323	10360
4	Interruptible Customer Usage (Dth)	0	15	479	735	0	0	0	0	0
5	Firm Transportation Usage (Dth)	0	0	0	0	0	0	0	0	0
6	Firm Sales Throughput (Dth)	18045	15124	12532	13032	12611	12323	11689	13323	10360
7	Average Actual Gas Day Temperature (Deg. F)	-25	-12	4	-7	-3	-14	-10	-24	-10
8	Heating Degree Days (HDD) 65 degree base	90	77	61	72	68	79	75	89	75
9	Non-HDD Sensitive Base (Dth)	291	291	494	243	243	500	333	208	839
10	Total HDD Sensitive Firm Throughput (Dth)	17754	14833	12038	12789	12368	11823	11356	13115	9521
11	Actual Firm Peak Day Dth/HDD (Dth)	197	193	197	178	182	150	151	147	127
12	Base + (Actual Dth/HDD * HDDs) (Dth)	18045	15124	12532	13032	12611	12323	11689	13323	10360
13	Peak Month Firm Customers	11614	11102	10811	10414	9946	9518	9063	8501	7910
14	Peak Day Use per Firm Customer	1.554	1.362	1.159	1.251	1.268	1.295	1.290	1.567	1.310

Greater Minnesota Gas, Inc.
Residential Peak Day Analysis

Line No.	Description	Design Day Calculation	Peak Day 2024-2025	Peak Day 2023-24	Peak Day 2022-23	Peak Day 2021-22	Peak Day 2020 - 21	Peak Day 2019 - 20	Peak Day 2018 - 19	Peak Day 2017 - 18
1	Date of Peak Day		1/20/2025	1/13/2024	12/22/2022	1/6/2022	2/14/2021	2/13/2020	1/29/2019	12/31/2017
2	Day of the Week		Monday	Saturday	Thursday	Thursday	Sunday	Thursday	Tuesday	Sunday
3	Total Throughput (Dth)	9821	9371	8115	8477	7802	7044	7052	7481	5776
4	Interruptible Customer Usage (Dth)	0	0	0	0	0	0	0	0	0
5	Firm Transportation Usage (Dth)	0	0	0	0	0	0	0	0	0
6	Firm Sales Throughput (Dth)	9821	9371	8115	8477	7802	7044	7052	7481	5776
7	Average Actual Gas Day Temperature (Deg. F)	-25	-12	4	-7	-3	-14	-10	-24	-10
8	Heating Degree Days (HDD) 65 degree base	90	77	61	72	68	79	75	89	75
9	Non-HDD Sensitive Base (Dth)	221	221	303	110	113	311	134	-43	343
10	Total HDD Sensitive Firm Throughput (Dth)	9600	9150	7812	8367	7689	6733	6918	7524	5433
11	Actual Firm Peak Day Dth/HDD (Dth)	107	119	128	116	113	85	92	85	72
12	Base + (Actual Dth/HDD * HDDs) (Dth)	9821	9371	8115	8477	7802	7044	7052	7481	5776
13	Peak Month Firm Residential Customers	10406	9931	9695	9395	9018	8660	8229	7726	7187
14	Peak Day Use per Residential Customer	0.944	0.944	0.837	0.902	0.865	0.813	0.857	0.968	0.804

Greater Minnesota Gas, Inc.
Firm Commercial Peak Day Analysis

Line No.	Description	Design Day Calculation	Peak Day 2024-25	Peak Day 2023-24	Peak Day 2022 - 23	Peak Day 2021 - 22	Peak Day 2020 - 21	Peak Day 2019 - 20	Peak Day 2018 - 19	Peak Day 2017 - 18
1	Date of Peak Day		1/20/2025	1/13/2024	12/22/2022	1/6/2022	2/14/2021	2/13/2020	1/29/2019	12/31/2017
2	Day of the Week		Monday	Saturday	Thursday	Thursday	Sunday	Thursday	Tuesday	Sunday
3	Total Throughput (Dth)	6064	5768	4827	5290	4809	4637	4637	5842	4584
4	Interruptible Customer Usage (Dth)	0	15	479	735	0	0	0	0	0
5	Firm Transportation Usage (Dth)	0	0	0	0	0	0	0	0	0
6	Firm Sales Throughput (Dth)	6064	5753	4348	4555	4809	4637	4637	5842	4584
7	Average Actual Gas Day Temperature (Deg. F)	-25	-12	4	-7	-3	-14	-10	-24	-10
8	Heating Degree Days (HDD) 65 degree base	90	77	61	72	68	79	75	89	75
9	Non-HDD Sensitive Base (Dth)	70	70	191	133	187	189	222	252	495
10	Total HDD Sensitive Firm Throughput (Dth)	5994	5683	4157	4422	4622	4448	4415	5590	4089
11	Actual Firm Peak Day Dth/HDD (Dth)	67	74	68	61	68	56	59	63	55
12	Base + (Actual Dth/HDD * HDDs) (Dth)	6064	5753	4348	4555	4809	4637	4637	5842	4584
13	Peak Month Firm Customers	1188	1163	1089	1003	946	894	939	775	723
14	Peak Day Use per Firm Commercial Customer	5.105	4.946	3.993	4.541	5.084	5.187	4.938	7.538	6.340

ATTACHMENT B
Demand Profile and Supply Comparison

2023 - 2024 Heating Season	Quantity (Dth)	Change in Quantity (Dth)
TF 12 (Nov. - Oct.)	210	-
TFX-7 (Oct. - Apr.)	665	-
TFX-5 (Nov. - Mar.)	6,344	-
TFX-5 (Nov. - Mar.)	90	-
TF 12 (Nov. - Oct.)	500	-
TF 12 (Nov. - Oct.)	500	-
TFX-5 (Nov. - Mar.)	349	-
TF 12 (Nov. - Oct.)	817	-
TF 12 (Nov. - Oct.)	333	-
TFX-5 (Nov. - Mar.)	1,000	-
TF 12 (Oct. - Sept.)	1,000	1,000
TF 12 (Nov. - Oct.)	500	500
FT-A Viking	1,400	-
FT-A Viking	1,200	-
FT-A Capacity Release - Non-recallable	-	-
FT-A Viking	2,200	-
FT-A Viking	1,000	-
FT-A Viking	1,000	-
SMS	3,500	-
Heating Season Total Capacity	19,108	1,500
Non-Heating Season Total Capacity	10,660	1,500
Total Entitlement @ Peak	19,108	1,500
Total Annual Transportation	-	-
Total Season Transportation	19,108	1,500
Total Percent Summer Vs. Winter	55.8%	
Total Percent Seasonal	100.0%	

2024 - 2025 Heating Season	Quantity (Dth)	Change in Quantity (Dth)
TF 12 (Nov. - Oct.)	210	-
TFX-7 (Oct. - Apr.)	665	-
TFX-5 (Nov. - Mar.)	6,344	-
TFX-5 (Nov. - Mar.)	90	-
TF 12 (Nov. - Oct.)	500	-
TF 12 (Nov. - Oct.)	500	-
TFX-5 (Nov. - Mar.)	349	-
TF 12 (Nov. - Oct.)	817	-
TF 12 (Nov. - Oct.)	333	-
TFX-5 (Nov. - Mar.)	1,000	-
TF 12 (Oct. - Sept.)	1,000	-
TF 12 (Nov. - Oct.)	500	-
TF 12 (Nov. - Oct.)	1,000	1,000
FT-A Viking	1,400	-
FT-A Viking	1,200	-
FT-A Capacity Release - Non-recallable	-	-
FT-A Viking	2,200	-
FT-A Viking	1,000	-
FT-A Viking	1,000	-
SMS	3,500	-
Heating Season Total Capacity	20,108	1,000
Non-Heating Season Total Capacity	11,660	1,000
Total Entitlement @ Peak	20,108	1,000
Total Annual Transportation	-	-
Total Season Transportation	20,108	1,000
Total Percent Summer Vs. Winter	58.0%	
Total Percent Seasonal	100.0%	

2025 - 2026 Heating Season	Quantity (Dth)	Change in Quantity (Dth)
TF 12 (Nov. - Oct.)	210	-
TFX-7 (Oct. - Apr.)	665	-
TFX-5 (Nov. - Mar.)	6,344	-
TFX-5 (Nov. - Mar.)	90	-
TF 12 (Nov. - Oct.)	500	-
TF 12 (Nov. - Oct.)	500	-
TFX-5 (Nov. - Mar.)	349	-
TF 12 (Nov. - Oct.)	817	-
TF 12 (Nov. - Oct.)	333	-
TFX-5 (Nov. - Mar.)	1,000	-
TF 12 (Oct. - Sept.)	1,000	-
TF 12 (Nov. - Oct.)	500	-
TF 12 (Nov. - Oct.)	1,000	-
TF 12 (Apr. - Mar.)	60	60
TF 12 (Apr. - Mar.)	1,000	1,000
FT-A Viking	1,400	-
FT-A Viking	1,200	-
FT-A Capacity Release - Non-recallable	-	-
FT-A Viking	2,200	-
FT-A Viking	1,000	-
FT-A Viking	1,000	-
SMS	4,000	**500**
Heating Season Total Capacity	21,168	1,060
Non-Heating Season Total Capacity	12,720	1,060
Total Entitlement @ Peak	21,168	1,060
Total Annual Transportation	-	-
Total Season Transportation	21,168	1,060
Total Percent Summer Vs. Winter	60.1%	
Total Percent Seasonal	100.0%	

ATTACHMENT C
Contract Entitlement Changes as of April 1, 2025, and June 1, 2025

Greater Minnesota Gas, Inc.
Natural Gas Contract Summary
Contract Entitlement Changes as of June, 2025

Contract Entitlements 2025-2026

Contract No.	Service Type	Rate Schedule	Months	Entitlement (Dth)	Expiration Date
102985	NNG Firm Throughput	TFX - 5	Nov-Mar	3,000	3/31/2027
102985	NNG Firm Throughput	TFX - 5	Nov-Mar	500	3/31/2028
102985	NNG Firm Throughput	TFX - 5	Nov-Mar	500	3/31/2029
102985	NNG Firm Throughput	TFX - 5	Nov-Mar	2,100	3/31/2030
102985	NNG Firm Throughput	TFX - 5	Nov-Mar	244	3/31/2030
121534	NNG Firm Throughput	TFX - 7	Oct-Apr	665	10/31/2030
135921	NNG Firm Throughput	TF - 12	Oct-Sep	181	10/31/2027
135921	NNG Firm Throughput	TF - 12	Oct-Sep	29	10/31/2027
135921	NNG Firm Throughput	TFX - 5	Nov-Mar	90	10/31/2027
135921	NNG Firm Throughput	TF - 12	Oct-Sep	500	10/31/2029
135921	NNG Firm Throughput	TF - 12	Apr-Mar	500	10/31/2027
135921	NNG Firm Throughput	TFX - 5	Nov-Mar	349	10/31/2027
135921	NNG Firm Throughput	TF - 12	Nov-Oct	817	10/31/2027
135921	NNG Firm Throughput	TF - 12	Nov-Oct	333	10/31/2040
120835	NNG Firm Throughput	TFX - 5	Nov-Mar	1,000	3/31/2026 **
142063	NNG Firm Throughput	TF - 12	Oct-Sept	1,000	10/31/2030
135921	NNG Firm Throughput	TF - 12	Nov-Oct	500	10/31/2029
140995	NNG Firm Throughput	TF - 12	Nov-Oct	1,000	10/31/2029
AFO216	Viking Forward Haul	FT-A	Nov-Oct	1,400	10/31/2028
AFO220	Viking Forward Haul	FT-A	Nov-Oct	1,200	1/31/2026 **
AFO300	Viking Forward Haul	FT-A	Nov-Oct	2,200	11/30/2027
AFO299	Viking Forward Haul	FT-A	Nov-Oct	1,000	10/31/2028
AFO445	Viking Forward Haul	FT-A	Nov-Oct	1,000	1/31/2027
		2025-26 Heating Season Total Capacity		20,108	
		2025-26 Design Day Demand		18,045	
		Reserve Margin		2,063	11.43%

Proposed Contract Entitlement Changes for 2025-26

Start Date	Contract No.	Service Type	Rate Schedule	Months	Entitlement (Dth)	Expiration Date
4/1/2025	140995	NNG Firm Throughput	TF - 12	Apr - Mar	60	3/31/2028
6/1/2025	144851	NNG Firm Throughput	TF - 12	Apr - Mar	1,000	3/31/2029
					1,060	
			2025-26 Heating Season Total Capacity		21,168	
			2025-26 Design Day Demand		18,045	
			Reserve Margin		3,123	17.31%

Proposed Change in Contract Demand Costs

Contract No.	Rate Schedule	Volume Dth / Day	No. of Months	Monthly Demand Rates	Total Annual Cost
140995	TF - 12	60	5	$ 25.799	$ 7,739.70
140995	TF - 12	60	7	$ 9.676	$ 4,063.92
144851	TF - 12 Base Summer	576	7	$ 9.676	$ 39,013.63
144851	TF - 12 Base Winter	576	5	$ 17.417	$ 50,160.96
144851	TF - 12 Variable Summer	424	7	$ 9.676	$ 28,718.37
144851	TF - 12 Variable Winter	424	5	$ 23.609	$ 50,051.08
					$ 179,747.66

**The contracts with 2026 expiration dates will be rolled over and will continue, because GMG has the contractual ability to do so.

ATTACHMENT D
Rate Impact of Proposed Contract Demand Entitlement as of April 1, 2025

Greater Minnesota Gas, Inc.
Contract Demand Entitlement Filing
Rate Impact - April 1, 2025

	Annualized Impact									
Residential	Last Rate Case 1/	Last Demand Change 2/	Current PGA w/o Demand Entitlement Change (March 1, 2025)	Proposed Demand Entitlement Change	Change from Last Rate Case	% Change from Last Rate Case	Change from Last Demand Change	% Change from Last Demand Change	Change from Most Recent PGA	% Change from Most Recent PGA
Commodity Cost of Gas (WACOG)	$ 3.8529	$ 3.9447	$ 3.9501	$ 3.9501	$ 0.10	2.52%	$ 0.0054	0.14%	$ -	0.00%
Demand Cost of Gas	$ 1.7063	$ 1.6963	$ 1.6963	$ 1.7044	$ (0.0019)	-0.11%	$ 0.0081	0.48%	$ 0.0081	0.48%
Total Cost of Gas	$ 5.5592	$ 5.6410	$ 5.6464	$ 5.6545	$ 0.0953	1.72%	$ 0.0135	0.24%	$ 0.0081	0.14%
Average Annual Usage (Dth)	**85.8**	85.8	85.8	85.8						
Average Annual Total Cost of Gas	$ 476.98	$ 484.00	$ 484.46	$ 485.16	$ 8.18	1.72%	$ 1.16	0.24%	$ 0.69	0.14%

	Annualized Impact									
Commercial & Industrial Firm	Last Rate Case 1/	Last Demand Change 2/	Current PGA w/o Demand Entitlement Change (March 1, 2025)	Proposed Demand Entitlement Change	Change from Last Rate Case	% Change from Last Rate Case	Change from Last Demand Change	% Change from Last Demand Change	Change from Most Recent PGA	% Change from Most Recent PGA
Commodity Cost of Gas (WACOG)	$ 3.8529	$ 3.9447	$ 3.9501	$ 3.9501	$ 0.10	2.52%	$ 0.0054	0.14%	$ -	0.00%
Demand Cost of Gas	$ 1.7063	$ 1.6963	$ 1.6963	$ 1.7044	$ (0.00)	-0.11%	$ 0.0081	0.48%	$ 0.0081	0.48%
Total Cost of Gas	$ 5.5592	$ 5.6410	$ 5.6464	$ 5.6545	$ 0.10	1.72%	$ 0.0135	0.24%	$ 0.0081	0.14%
Average Annual Usage (Dth)	**826.7**	826.7	826.7	826.7						
Average Annual Total Cost of Gas	$ 4,595.77	$ 4,663.45	$ 4,667.91	$ 4,674.59	$ 78.83	1.72%	$ 11.14	0.24%	$ 6.68	0.14%

Notes:

1/ Docket Nos. G022/GR-24-350 & G022/GR-24-351

2/ Docket No. G022/M-24-339

ATTACHMENT D
Total Rate Impact of Proposed Contract Demand Entitlement as of June 1, 2025 (as compared to March 2025)

Greater Minnesota Gas, Inc.
Contract Demand Entitlement Filing

Rate Impact - June 1, 2025

	Annualized Impact									
Residential	Last Rate Case 1/	Last Demand Change 2/	Current PGA w/o Demand Entitlement Change (March 1, 2025)	Proposed Demand Entitlement Change	Change from Last Rate Case	% Change from Last Rate Case	Change from Last Demand Change	% Change from Last Demand Change	Change from Most Recent PGA	% Change from Most Recent PGA
Commodity Cost of Gas (WACOG)	$ 3.8529	$ 3.9447	$ 3.9501	$ 3.9501	$ 0.0972	2.52%	$ 0.0054	0.14%	$ -	0.00%
Demand Cost of Gas	$ 1.7063	$ 1.6963	$ 1.6963	$ 1.8194	$ 0.1131	6.63%	$ 0.1231	7.25%	$ 0.1231	7.25%
Total Cost of Gas	$ 5.5592	$ 5.6410	$ 5.6464	$ 5.7695	$ 0.2103	3.78%	$ 0.1285	2.28%	$ 0.1231	2.18%
Average Annual Usage (Dth)	**85.8**	85.8	85.8	85.8						
Average Annual Total Cost of Gas	$ 476.98	$ 484.00	$ 484.46	$ 495.02	$ 18.05	3.78%	$ 11.02	2.28%	$ 10.56	2.18%

	Annualized Impact									
Commercial & Industrial Firm	Last Rate Case 1/	Last Demand Change 2/	Current PGA w/o Demand Entitlement Change (March 1, 2025)	Proposed Demand Entitlement Change	Change from Last Rate Case	% Change from Last Rate Case	Change from Last Demand Change	% Change from Last Demand Change	Change from Most Recent PGA	% Change from Most Recent PGA
Commodity Cost of Gas (WACOG)	$ 3.8529	$ 3.9447	$ 3.9501	$ 3.9501	$ 0.0972	2.52%	$ 0.0054	0.14%	$ -	0.00%
Demand Cost of Gas	$ 1.7063	$ 1.6963	$ 1.6963	$ 1.8194	$ 0.1131	6.63%	$ 0.1231	7.25%	$ 0.1231	7.25%
Total Cost of Gas	$ 5.5592	$ 5.6410	$ 5.6464	$ 5.7695	$ 0.2103	3.78%	$ 0.1285	2.28%	$ 0.1231	2.18%
Average Annual Usage (Dth)	**826.7**	826.7	826.7	826.7						
Average Annual Total Cost of Gas	$ 4,595.77	$ 4,663.45	$ 4,667.91	$ 4,769.65	$ 173.88	3.78%	$ 106.20	2.28%	$ 101.73	2.18%

Notes:

1/ Docket Nos. G022/GR-24-350 & G022/GR-24-351

2/ Docket No. G022/M-24-339

Greater Minnesota Gas, Inc
Purchased Gas Adjustment (PGA) Calculation

Effective date of implementation: Natural Gas usage on and after **March 1, 2025**

Change in cost of gas due to an estimated decrease in the market price of natural gas from February 2025.

This PGA is based on the following Gas Tariffs for Northern Natural Gas and Viking Natural Gas:

Source: NNG Tariffs in effect 10/1/11	Source: Viking Gas Trasmission Tariffs in effect 02/01/2024
21st Revised Sheet No. 50	v.56.0.0 superseding v.55.0.0
Issued 5/18/23 - Effective 05/01/23	Issued: 01/31/2024
24th Revised Sheet No. 51	Effective: 02/01/2024
Issued 5/18/23 - Effective 05/01/23	
7th Revised Sheet No. 55	
Issued 5/18/23 - Effective 05/01/23	

I. Greater Minnesota Gas, Inc - Base Cost of Gas
Approved in Docket No. G022/GR-24-351 on 12/11/2024

				Rate / CCF	
All Customer Sales Rate Classes - Demand			**Total Cost**	**Firm**	**Interruptible**
	Viking Contracts		$ 458,592	$ 0.031579	
	NNG Contracts		$ 2,019,281	$ 0.139049	
			$ -	$ -	
			$ -	$ -	
	Total Capacity Cost		$ 2,477,873		
Rate Case 2024 Firm Sales Service Volume - CCF		14,522,130			
Demand Base Cost of Gas				$ 0.170627	$ -
All Customer Sales Rate Classes - Commodity					
All Classes Commodity Cost			$ 6,473,172		
Rate Case Total Sales Service Volume - CCF		16,800,739			
Commodity Base Cost of Gas/CCF				$ 0.385291	$ 0.385291
Total Base Cost of Gas/CCF			**$ 8,951,044**	**$ 0.555918**	**$ 0.385291**

Annual Sales Volume - 2024 Rate Case Sales Service Volume - CCF

Sales Service Volume - CCF	14,522,130
Interruptible Service Volume - CCF	2,278,609

II. Greater Minnesota Gas, Inc - Current Cost of Gas Effective March 1, 2025

Commodity Cost of Gas	**$0.39501**	**WACOG**

III. Annual Sales Volume - 2024-2025 Budget (September - August) **16,826,677**

Sales Service Volume - CCF	14,607,049
Interruptible Service Volume - CCF	2,219,628

IV. Greater Minnesota Gas, Inc.'s -- Current Cost of Gas Effective March 1, 2025

All Customer Sales Rate Classes	**MCF**	**Months**	**Tariff Rate**	**Total Cost**	**Firm**	**Interruptible**	**Ag**
Viking Zone 1	1,000	12	$ 5.62	$ 67,440	$ 0.004617		
Viking Zone 1	1,400	12	$ 5.62	$ 94,416	$ 0.006464		
Viking Zone 1	1,200	12	$ 5.62	$ 80,928	$ 0.005540		
Viking Zone 1	2,200	12	$ 5.62	$ 148,368	$ 0.010157		
Viking Zone 1	1,000	12	$ 5.62	$ 67,440	$ 0.004617		
TFX - 5	6,344	5	$ 25.80	$ 818,344	$ 0.056024		
TF - 12	1,027	5	$ 20.73	$ 106,433	$ 0.007286		
TF - 12	1,027	7	$ 9.68	$ 69,561	$ 0.004762		
TF - 12	232	5	$ 17.42	$ 20,204	$ 0.001383		
TF - 12	268	5	$ 23.61	$ 31,636	$ 0.002166		
TF - 12	500	7	$ 9.68	$ 33,866	$ 0.002318		
TF - 12	232	5	$ 17.42	$ 20,204	$ 0.001383		
TF - 12	268	5	$ 23.61	$ 31,636	$ 0.002166		
TF - 12	500	7	$ 9.68	$ 33,866	$ 0.002318		
TF - 12	1,000	5	$ 25.80	$ 128,995	$ 0.008831		
TF - 12	1,000	7	$ 9.68	$ 67,732	$ 0.004637		
TF - 12	833	7	$ 9.68	$ 56,421	$ 0.003863		
TF - 12	655	5	$ 17.42	$ 57,041	$ 0.003905		
TF - 12	178	5	$ 23.61	$ 21,012	$ 0.001438		
TFX - 5	1,000	12	$ 19.84	$ 238,056	$ 0.016297		
TFX - 5	1,000	5	$ 25.80	$ 128,995	$ 0.008831		
TF - 5	439	5	$ 25.80	$ 56,629	$ 0.003877		
TFX - 7	665	5	$ 25.80	$ 85,782	$ 0.005873		
TFX - 7	665	2	$ 9.68	$ 12,869	$ 0.000881		
Current Demand Cost of Gas				$ 2,477,873	$ 0.169634	$ -	$ -
Current Commodity Cost of Gas/CCF	% of Total	73%		$ 6,646,706	$0.395010	$0.395010	$0.395010
Total Cost of Gas/CCF				**$ 9,124,578**	**$ 0.564644**	**$ 0.395010**	**$ 0.395010**

Summary of Cost
All Customer Sales Rate Classes

	FIRM SALES				AGRICULTURAL INTERRUPTIBLE				GENERAL INTERRUPTIBLE			
	Total Demand	**Total Commodity**	**True Up**	**Total**	**Total Demand**	**Total Commodity**	**True Up**	**Total**	**Total Demand**	**Total Commodity**	**True Up**	**Total**
1) Base Rate	$ 0.170627	$ 0.385291	$ -	**$ 0.555918**	$ -	$ 0.385291	$ -	**$ 0.385291**	$ -	$ 0.385291	$ -	**$ 0.385291**
2) Prior PGA	$ (0.000993)	$ 0.050619	$ 0.019080	**$ 0.068706**	$ -	$ 0.050619	$ (0.002180)	**$ 0.048439**	$ -	$ 0.050619	$(0.012210)	**$ 0.038409**
3) Current Adj	$ -	$ (0.040900)	$ -	**$ (0.040900)**	$ -	$ (0.040900)	$ -	**$(0.040900)**	$ -	$ (0.040900)	$ -	**$(0.040900)**
4) PGA Billed (2+3)	$ (0.000993)	$ 0.009719	$ 0.019080	**$ 0.027806**	$ -	$ 0.009719	$ (0.002180)	**$ 0.007539**	$ -	$ 0.009719	$(0.012210)	**$(0.002491)**
5) Average Cost of Gas	$ 0.169634	$ 0.395010	$ 0.019080	**$ 0.583724**	$ -	$ 0.395010	$ (0.002180)	**$ 0.392830**	$ -	$ 0.395010	$(0.012210)	**$ 0.382800**

	Prior Cumulative Adjustments	Demand & Commodity Cost	True-Up Adjustment Factor	Current PGA Adjustment
All Firm Sales Rate Classes (/CCF)	$ 0.049626	$ (0.040900)	$ 0.019080	**$ 0.027806**
Ag Inter. Sales Rate Classes (/CCF)	$ 0.050619	$ (0.040900)	$ (0.002180)	**$ 0.007539**
Gen. Inter. Sales Rate Classes (/CCF)	$ 0.050619	$ (0.040900)	$ (0.012210)	**$ (0.002491)**

March 1, 2025	**Tariff Rate Designation**	**Non-Gas Commodity Margin**	**Commodity Cost**	**Demand Other PGA Exp**	**Total Cost of Gas**	**True Up Factor**	**Total Billing Rate**
Residential	RS1	$ 0.441646	$ 0.395010	$ 0.169634	$ 0.564644	$ 0.019080	**$ 1.025370**
Small Commercial CS1	SCS1	$ 0.423646	$ 0.395010	$ 0.169634	$ 0.564644	$ 0.019080	**$ 1.007370**
Commercial CS1	CS1	$ 0.393646	$ 0.395010	$ 0.169634	$ 0.564644	$ 0.019080	**$ 0.977370**
Commercial/Industrial MS1	MS1	$ 0.373646	$ 0.395010	$ 0.169634	$ 0.564644	$ 0.019080	**$ 0.957370**
Commercial/Industrial LS1	LS1	$ 0.358646	$ 0.395010	$ 0.169634	$ 0.564644	$ 0.019080	**$ 0.942370**
Agricultural - Interruptible	AG1	$ 0.228626	$ 0.395010	$ -	$ 0.395010	$ (0.002180)	**$ 0.621456**
General Interruptible	IND1	$ 0.248626	$ 0.395010	$ -	$ 0.395010	$ (0.012210)	**$ 0.631426**

Estimated Gas Volumes March 1,900,000 CCF

FOR ILLUSTRATIVE PURPOSES ONLY – as of March 1, 2025

Greater Minnesota Gas, Inc
Purchased Gas Adjustment (PGA) Calculation

Effective date of implementation: Natural Gas usage on and after **March 1, 2025**

Change in cost of gas due to an estimated decrease in the market price of natural gas from February 2025.

This PGA is based on the following Gas Tariffs for Northern Natural Gas and Viking Natural Gas:

Source: NNG Tariffs in effect 10/1/11	Source: Viking Gas Trasmission Tariffs in effect 02/01/2024
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Issued 5/18/23 - Effective 05/01/23	Issued: 01/31/2024
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Issued 5/18/23 - Effective 05/01/23	
7th Revised Sheet No. 55	
Issued 5/18/23 - Effective 05/01/23	

I. Greater Minnesota Gas, Inc - Base Cost of Gas
Approved in Docket No. G022/GR-24-351 on 12/11/2024

				Rate / CCF	
All Customer Sales Rate Classes - Demand		**Total Cost**	**Firm**	**Interruptible**
	Viking Contracts	$ 458,592	$ 0.031579	
	NNG Contracts	$ 2,019,281	$ 0.139049	
		$ -	$ -	
		$ -	$ -	
	Total Capacity Cost	$ 2,477,873		
Rate Case 2024 Firm Sales Service Volume - CCF	14,522,130			
Demand Base Cost of Gas			$ 0.170627	$ -
All Customer Sales Rate Classes - Commodity				
All Classes Commodity Cost		$ 6,473,172		
Rate Case Total Sales Service Volume - CCF	16,800,739			
Commodity Base Cost of Gas/CCF			$ 0.385291	$ 0.385291
Total Base Cost of Gas/CCF		**$ 8,951,044**	**$ 0.555918**	**$ 0.385291**

Annual Sales Volume - 2024 Rate Case Sales Service Volume - CCF

Sales Service Volume - CCF	14,522,130
Interruptible Service Volume - CCF	2,278,609

II. Greater Minnesota Gas, Inc - Current Cost of Gas Effective March 1, 2025

Commodity Cost of Gas	**$0.39501**	**WACOG**

III. Annual Sales Volume - 2024-2025 Budget (September - August) **16,826,677**

Sales Service Volume - CCF	14,607,049
Interruptible Service Volume - CCF	2,219,628

IV. Greater Minnesota Gas, Inc.'s -- Current Cost of Gas Effective March 1, 2025

All Customer Sales Rate Classes	**MCF**	**Months**	**Tariff Rate**	**Total Cost**	**Firm**	**Interruptible**	**Ag**
Viking Zone 1	1,000	12	$ 5.62	$ 67,440	$ 0.004617		
Viking Zone 1	1,400	12	$ 5.62	$ 94,416	$ 0.006464		
Viking Zone 1	1,200	12	$ 5.62	$ 80,928	$ 0.005540		
Viking Zone 1	2,200	12	$ 5.62	$ 148,368	$ 0.010157		
Viking Zone 1	1,000	12	$ 5.62	$ 67,440	$ 0.004617		
TFX - 5	6,344	5	$ 25.80	$ 818,344	$ 0.056024		
TF - 12	1,027	5	$ 20.73	$ 106,433	$ 0.007286		
TF - 12	1,027	7	$ 9.68	$ 69,561	$ 0.004762		
TF - 12	232	5	$ 17.42	$ 20,204	$ 0.001383		
TF - 12	268	5	$ 23.61	$ 31,636	$ 0.002166		
TF - 12	500	7	$ 9.68	$ 33,866	$ 0.002318		
TF - 12	232	5	$ 17.42	$ 20,204	$ 0.001383		
TF - 12	268	5	$ 23.61	$ 31,636	$ 0.002166		
TF - 12	500	7	$ 9.68	$ 33,866	$ 0.002318		
TF - 12	1,000	5	$ 25.80	$ 128,995	$ 0.008831		
TF - 12	1,000	7	$ 9.68	$ 67,732	$ 0.004637		
TF - 12	833	7	$ 9.68	$ 56,421	$ 0.003863		
TF - 12	655	5	$ 17.42	$ 57,041	$ 0.003905		
TF - 12	178	5	$ 23.61	$ 21,012	$ 0.001438		
TF - 12	1,000	12	$ 19.84	$ 238,056	$ 0.016297		
TFX - 5	1,000	5	$ 25.80	$ 128,995	$ 0.008831		
TF - 5	439	5	$ 25.80	$ 56,629	$ 0.003877		
TFX - 7	665	5	$ 25.80	$ 85,782	$ 0.005873		
TFX - 7	665	2	$ 9.68	$ 12,869	$ 0.000881		
TF 12 (Apr. - Mar.)	60	5	$ 25.80	$ 7,740	$ 0.000530		
TF 12 (Apr. - Mar.)	60	7	$ 9.68	$ 4,064	$ 0.000278		
TF 12 (Apr. - Mar.)	576	5	$ 17.42	$ 50,161	$ 0.003434		
TF 12 (Apr. - Mar.)	576	7	$ 9.68	$ 39,014	$ 0.002671		
TF 12 (Apr. - Mar.)	424	5	$ 23.61	$ 50,051	$ 0.003427		
TF 12 (Apr. - Mar.)	424	7	$ 9.68	$ 28,718	$ 0.001966		
Current Demand Cost of Gas				$ 2,657,620	$ 0.181940	$ -	$ -
Current Commodity Cost of Gas/CCF	% of Total	71%		$ 6,646,706	$0.395010	$0.395010	$0.395010
Total Cost of Gas/CCF				**$ 9,304,326**	**$ 0.576950**	**$ 0.395010**	**$ 0.395010**

FOR ILLUSTRATIVE PURPOSES ONLY

Summary of Cost
All Customer Sales Rate Classes

	FIRM SALES				AGRICULTURAL INTERRUPTIBLE				GENERAL INTERRUPTIBLE			
	Total Demand	**Total Commodity**	**True Up**	**Total**	**Total Demand**	**Total Commodity**	**True Up**	**Total**	**Total Demand**	**Total Commodity**	**True Up**	**Total**
1) Base Rate	$ 0.170627	$ 0.385291	$ -	**$ 0.555918**	$ -	$ 0.385291	$ -	**$ 0.385291**	$ -	$ 0.385291	$ -	**$ 0.385291**
2) Prior PGA	$ (0.000993)	$ 0.050619	$ 0.019080	**$ 0.068706**	$ -	$ 0.050619	$ (0.002180)	**$ 0.048439**	$ -	$ 0.050619	$ (0.012210)	**$ 0.038409**
3) Current Adj	$ 0.012306	$ (0.040900)	$ -	**$ (0.028594)**	$ -	$ (0.040900)	$ -	**$ (0.040900)**	$ -	$ (0.040900)	$ -	**$ (0.040900)**
4) PGA Billed (2+3)	$ 0.011313	$ 0.009719	$ 0.019080	**$ 0.040112**	$ -	$ 0.009719	$ (0.002180)	**$ 0.007539**	$ -	$ 0.009719	$ (0.012210)	**$ (0.002491)**
5) Average Cost of Gas	$ 0.181940	$ 0.395010	$ 0.019080	**$ 0.596030**	$ -	$ 0.395010	$ (0.002180)	**$ 0.392830**	$ -	$ 0.395010	$ (0.012210)	**$ 0.382800**

	Prior Cumulative Adjustments	Demand & Commodity Cost	True-Up Adjustment Factor	Current PGA Adjustment
All Firm Sales Rate Classes (/CCF)	$ 0.049626	$ (0.028594)	$ 0.019080	**$ 0.040112**
Ag Inter. Sales Rate Classes (/CCF)	$ 0.050619	$ (0.040900)	$ (0.002180)	**$ 0.007539**
Gen. Inter. Sales Rate Classes (/CCF)	$ 0.050619	$ (0.040900)	$ (0.012210)	**$ (0.002491)**

March 1, 2025	**Tariff Rate Designation**	**Non-Gas Commodity Margin**	**Commodity Cost**	**Demand Other PGA Exp**	**Total Cost of Gas**	**True Up Factor**	**Total Billing Rate**
Residential	RS1	$ 0.441646	$ 0.395010	$ 0.181940	$ 0.576950	$ 0.019080	**$ 1.037676**
Small Commercial CS1	SCS1	$ 0.423646	$ 0.395010	$ 0.181940	$ 0.576950	$ 0.019080	**$ 1.019676**
Commercial CS1	CS1	$ 0.393646	$ 0.395010	$ 0.181940	$ 0.576950	$ 0.019080	**$ 0.989676**
Commercial/Industrial MS1	MS1	$ 0.373646	$ 0.395010	$ 0.181940	$ 0.576950	$ 0.019080	**$ 0.969676**
Commercial/Industrial LS1	LS1	$ 0.358646	$ 0.395010	$ 0.181940	$ 0.576950	$ 0.019080	**$ 0.954676**
Agricultural - Interruptible	AG1	$ 0.228626	$ 0.395010	$ -	$ 0.395010	$ (0.002180)	**$ 0.621456**
General Interruptible	IND1	$ 0.248626	$ 0.395010	$ -	$ 0.395010	$ (0.012210)	**$ 0.631426**

Estimated Gas Volumes March 1,900,000 CCF

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 Amended Petition for Change in Contract Demand Entitlement for 2025-2026 Heating Season
Docket No. G022/M-25-70

filed this 30th of May, 2025.

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

Official Service List
Docket G022/M-25-70

Last Name	First Name	Email	Organization/Agency	Agency	Delivery Method	View Trade Secret	Service List Name
Anderson	Kristine	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		Electronic Service	No	M-25-70
Burke	Robin	rburke@greatermngas.com	Greater Minnesota Gas, Inc.		Electronic Service	No	M-25-70
Chilson	Cody	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC		Electronic Service	No	M-25-70
Commerce Attorneys	Generic	commerce.attorneys@ag.state.mn.us	Office of the Attorney General - Department of Commerce		Electronic Service	Yes	M-25-70
Ferguson	Sharon	sharon.ferguson@state.mn.us	Department of Commerce		Electronic Service	No	M-25-70
Kupser	Nicolle	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		Electronic Service	No	M-25-70
Palmer	Greg	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		Electronic Service	No	M-25-70
Residential Utilities Division	Generic Notice	residential.utilities@ag.state.mn.us	Office of the Attorney General - Residential Utilities Division		Electronic Service	Yes	M-25-70
Seuffert	Will	will.seuffert@state.mn.us	Public Utilities Commission		Electronic Service	Yes	M-25-70