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June 28, 2013

Dr. Burl Haar
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

Re: Demand Entitlement Filing
Docket No. G004/M-13-____

Dear Dr. Haar:

Great Plains Natural Gas Co. (Great Plains), a Division of MDU Resources Group, Inc., herewith electronically submits its Demand Entitlement Filing pursuant to Minnesota Rule 7825.2910, Subpart 2 for the 2013-2014 winter heating season.

Great Plains is requesting to change its demand portfolio to reflect the reallocation of the TF12 contract from Northern Natural Gas Co. (Northern), as shown on Exhibit A. Great Plains requests that changes in the capacity be effective November 1, 2013, which corresponds with the effective date of Northern's TF12 Base and Variable capacity reallocation.¹

In support of the filing Great Plains has attached the following exhibits:

- Exhibit A – Demand Profile
- Exhibit B – Design Day Capacity
- Exhibit C – Rate Impacts
- Exhibit D – Demand Entitlement Analysis

Exhibit A - Demand Profile

In the North District, Great Plains has contracted for 5,000 dk per day of forward haul on the Viking system with the receipt point of Emerson and 10,000 per day of back haul capacity, which, when combined is sufficient to meet the estimated peak day demand. The North District capacity for the 2013-2014 heating season will be the same as the 2012-2013 heating season, and Great Plains projects a 6.1 percent reserve for the upcoming heating season.

¹ Great Plains is submitting its filing at this time in light of the Department's recommendation in its February 2, 2012 Comments in Docket No. G004/M-11-1075 and March 18, 2013 Comments in Docket No. G004/M-12-740 that Great Plains file its annual demand entitlement filings by July 1 each year going forward.

In the South District, pursuant to Northern's FERC tariff, Northern adjusts each TF12 contract between TF12 Base and TF12 Variable effective November 1 of each year, based on the amount of capacity used during the preceding May – September period. At this time, the amount of the adjustment is not yet known, however, the change is normally not significant and there is no deliverability difference between the TF12 Base and TF12 Variable entitlement. The change in the TF12 Base and TF12 Variable will be known by November 1, 2013. With the exception of the TF12 base and variable capacity, Great Plains will retain its existing firm transportation contracts, which total 15,645 dk of capacity and projects a 2.3 percent reserve for the upcoming heating season.

Great Plains has converted its FT-A, Zone 1-2 contract of 4,500 dk, which is utilized in both the North District and South District, to FT-A, Zone 1-1, as a result of the expiration of the long term transportation contract which expired November 1, 2012.

Great Plains' analyses indicate that it will have adequate capacity to serve its firm service customers in the 2013-2014 heating season. Prior to the heating season, Great Plains will review the reserve margins to ensure adequate capacity is available to meet the projected peak day demand. The options available include balancing the reserve capacity of the North and South Districts or contracting for monthly gate station deliveries from marketers on the Northern Natural and/or Viking pipeline systems.

Finally, pages 2 and 3 of Exhibit A show the demand profile history for the 2011-2012, 2012-2013 and proposed 2013-2014 heating seasons.

Exhibit B – Design Day Capacity

In support of its proposed demand profile, Great Plains has provided its design day calculations for the North District and South District in Exhibit B.

On June 27, 2012, Great Plains filed its Compliance Filing pursuant to the Commission's Order in Docket Nos. G004/M-07-1401, G004/M-08-1306, G004/M-9-1262, and G004/M-10-1164. In its Order, the Commission required Great Plains to develop a design day forecast methodology that addressed the concerns of the Department that were raised in the referenced dockets. Great Plains worked with the Department to review its design day methodology and potentially develop a new design day forecast methodology. Great Plains and the Department ultimately concluded that Great Plains' current design day methodology did not produce unreasonable results and Great Plains should continue to use its methodology for determining design day demand.

In compliance with the determinations made in Docket No. G004/M-03-303 and its Agreement with the Department, Great Plains performed a regression analysis using 36 months of history in its design day methodology. This produces an estimate of the design day demand for firm gas service and supports the required pipeline capacity levels. Due to the different weather patterns in its service area, Great Plains performed regressions for the South District, Crookston and Fergus Falls areas in the North District, and Wahpeton, North Dakota. Based on the study and Great Plains' proposed capacity levels, Great Plains is anticipating a reserve

margin of 6.1 percent in the North District and 2.3 percent in the South District. This level of reserve margin is consistent with the Commission's directive in its September 30, 2010 Order in Docket No. G004/M-09-1262 that Great Plains reduce its reserve margin to approximately 5 percent in the North District and South District. Great Plains' proposed reserve levels comply with the Commission's directive.

Future Changes

The current abundance of supply, with the economic energy source natural gas provides, is bringing about the conversion of users of alternate fuels to natural gas as the desired form of energy. Great Plains has seen a renewed interest for natural gas throughout its service territory and anticipates additional growth of this reasonably priced clean burning fuel. Great Plains will continue to monitor customer growth and related increase in demand as well as the offsetting effect of conservation.

Exhibit C – Rate Impacts

Exhibit C shows the impacts to customers due to the capacity changes discussed above. There are no projected changes in rates from the rates in effect in June 2013.

Exhibit D – Demand Entitlement Analysis

Exhibit D reflects the historical design day requirement, total entitlement and peak day design, entitlement and firm sendout per customer for the 1995-1996 to the 2013-2014 heating seasons.

Other

As Great Plains described in previous Demand Entitlement filings, its actual and verifiable use per customer has been declining over the years. Great Plains has posited that such decline is largely a result of conservation efforts and could also be impacted by new construction in its service territory. Great Plains reasonably assumed that new construction could be a contributor to the declining use per customer on the basis that new construction likely results in installation of more energy efficient appliances, better insulation and other efficiencies.

In the Department's Comments in Docket No. G004/M-09-1262, the Department recommended that Great Plains compare actual usage for new construction to usage for older construction for both its North and South Districts. The Department subsequently reiterated its request in its Comments in Docket No. G004/M-12-740. In its Reply Comments dated March 18, 2013, Great Plains indicated that it was working on its analysis and proposed to submit its findings in this DEQ filing.

Since it filed its March 18, 2013 Comments, Great Plains has continued to explore different ways of identifying and developing a reliable method to determine, on a comparable basis, the usage at a newly constructed home versus an older constructed home. To date, Great Plains

has been unable to find a way to accurately quantify the differing types of consumption due to the number of variables and lack of data related to the variables.

In particular, in order to develop a valid comparison of gas usage between new and older constructed homes, there are several variables that need to be taken into consideration. Such variables include:

- (1) Identifying what constitutes new construction, e.g., a house less than 5 years old? 10 years?
- (2) The relative sizes (square feet) of the new versus older houses that would be compared. Is it reasonable to assume, for instance, that newly constructed homes have more square feet than older homes and thus more space heating needs? Is so, how, are older and newer homes compared?
- (3) The type of usage, i.e., space heating, water heating, fireplace, cooking, other appliances, or standby service.

Great Plains' customer records do not contain this information and Company personnel were unable to develop a cost effective study that would produce reliable/informative data absent this information. As a result, despite its efforts Great Plains has found it infeasible to isolate the component the declining use per customer resulting from improved building design. Notwithstanding this fact, Great Plains remains open to suggestions regarding how such a study could be completed, but is concerned that any conclusions would be speculative.

Importantly, however, we do know from actual data that Great Plains' use per customer has been declining over the years, and the efficiency in newer constructed houses is likely one of the factors that has contributed to the continuing declining use. Other factors also contribute to declining use per customer, including appliance efficiencies and Great Plains' Conservation Improvement Plan. While isolating how each factor contributed to this decline may be useful, Great Plains has not been able to determine how such an analysis would be undertaken in a reliable and cost effective manner.

If you have any questions regarding this filing, please contact me at (701) 222-7854, or Brian M. Meloy, at (612) 335-1451.

Sincerely,

/s/ Rita A. Mulkern

Rita A. Mulkern
Director of Regulatory Affairs

cc: Brian M. Meloy

**GREAT PLAINS NATURAL GAS CO.
DEMAND ENTITLEMENT FILING 2013 - 2014 HEATING SEASON
DEMAND PROFILE EFFECTIVE NOVEMBER 1, 2013**

<u>Type of Capacity or Entitlement</u>	<u>Current Amount</u>	<u>Proposed Change</u>	<u>Proposed Amount</u>	<u>Contract Length</u>	<u>Expiration Date</u>
<u>Demand Profile for South District (dk):</u>					
TF12 Base (Summer & Winter) 1/	5,644	0	5,644	5 years	10/31/14
TF12 Variable (Summer & Winter) 1/	1,891	0	1,891	5 years	10/31/14
TF5 (November - March) 1/	3,410	0	3,410	5 years	10/31/14
TFX Seasonal (November - March)	4,700	0	4,700	5 years	10/31/14
Subtotal	<u>15,645</u>	<u>0</u>	<u>15,645</u>		
FT-A - Zone 1-1 (April - October)	500	4,500	5,000	1 Year	10/31/14
FT-A - Zone 1-2 (April - October)	4,500	(4,500)	0	1 Year	
SMS	2,500	0	2,500	5 Years	10/31/14
FDD-1 Reservation	4,640	0	4,640	5 Years	5/31/16
Heating Season Total Capacity:	15,645	0	15,645		
Non-Heating Season Total Capacity:	7,535	0	7,535		
Forecasted Heating Season Design Day:	14,850	443	15,293		
Estimated Non-Heating Season Design Day:	7,879	319	8,198		
Heating Season Capacity: Surplus/(Shortage)	795	(443)	352		
Non-Heating Season Capacity: Surplus/(Shortage)	(344)	(319)	(663)		
<u>Demand Profile for North District (dk) 2/</u>					
FT-A (Backhaul)	8,000	0	8,000	5 Years	10/31/17
FT-A - Zone 1-1 (November - March)	500	4,500	5,000	1 Year	10/31/14
FT-A - Zone 1-2 (November - March)	4,500	(4,500)	0	1 Year	
TFX Seasonal (November - March)	2,000	0	2,000	20 Years	10/31/14
Subtotal	<u>15,000</u>	<u>0</u>	<u>15,000</u>		
FT-A Seasonal (November - March) 3/	2,000	0	2,000	2 Years	10/31/14
LMS Demand	2,500	0	2,500	1 Year	10/31/14
TFX (Annual)	13,000	0	13,000	11.5 Years	3/31/24
Heating Season Total Capacity:	15,000	0	15,000		
Non-Heating Season Total Capacity:	8,000	0	8,000		
Forecasted Heating Season Design Day:	14,095	45	14,140		
Estimated Non-Heating Season Design Day:	8,179	(122)	8,057		
Heating Season Capacity: Surplus/(Shortage)	905	(45)	860		
Non-Heating Season Capacity: Surplus/(Shortage)	(179)	122	(57)		

1/ Effective November 1, 2013.

2/ Minnesota North District communities plus Wahpeton, ND.

3/ Northern Natural North Branch Backhaul.

**GREAT PLAINS NATURAL GAS CO.
DEMAND PROFILE
NORTH DISTRICT**

2010-2011 Heating Season G004/M-11-1075		2012-2013 Heating Season G004/M-12-740		2013-2014 Heating Season G004/M-13-		Difference
	Quantity (dk)		Quantity (dk)		Quantity (dk)	
FT-A (12 months)	7,841	FT-A (12 months)	8,000	FT-A (12 months)	8,000	0
FT-A (November through March)	5,000	FT-A (November through March)	5,000	FT-A (November through March)	5,000	0
TFX (November through March)	2,000	TFX (November through March)	2,000	TFX (November through March)	2,000	0
		TFX (12 months)	13,000	TFX (12 months)	13,000	0
FT-A (November through March)	2,000	FT-A (November through March)	2,000	FT-A (November through March)	2,000	0
LMS Demand	2,500	LMS Demand	2,500	LMS Demand	2,500	0
Brokered Reservation Charge (Emerson)	13,015	Brokered Reservation Charge (Emerson)		Brokered Reservation Charge (Emerson)		0
Heating Season Total Capacity	14,841	Heating Season Total Capacity	15,000	Heating Season Total Capacity	15,000	0
Non-Heating Season Total Capacity	7,841	Non-Heating Season Total Capacity	8,000	Non-Heating Season Total Capacity	8,000	0
Total Entitlement (Including Peak Shaving)	14,841	Total Entitlement (Including Peak Shaving)	15,000	Total Entitlement (Including Peak Shaving)	15,000	0
Total Annual Transportation	7,841	Total Annual Transportation	8,000	Total Annual Transportation	8,000	0
Total Season Transportation	7,000	Total Season Transportation	7,000	Total Season Transportation	7,000	0
Total Percent Seasonal	47.17%	Total Percent Seasonal	46.67%	Total Percent Seasonal	46.67%	0.00%

**GREAT PLAINS NATURAL GAS CO.
DEMAND PROFILE
SOUTH DISTRICT**

2011-2012 Heating Season G004/M-11-1075		2012-2013 Heating Season G004/M-12-740		2012-2013 Heating Season G004/M-13-		Difference
	Quantity (dk)		Quantity (dk)		Quantity (dk)	
TF-12 Base	5,644	TF-12 Base	5,644	TF-12 Base	5,644	0
TF-12 Variable	1,891	TF-12 Variable	1,891	TF-12 Variable	1,891	0
FT-A (April through October)	5,000	FT-A (April through October)	5,000	FT-A (April through October)	5,000	0
TF-5 (November through March)	3,410	TF-5 (November through March)	3,410	TF-5 (November through March)	3,410	0
TFX (November through March)	4,700	TFX (November through March)	4,700	TFX (November through March)	4,700	0
Peak Shaving	0	Peak Shaving	0	Peak Shaving	-	0
SMS	2,500	SMS	2,500	SMS	2,500	0
FDD-1 Reservation	4,640	FDD-1 Reservation	4,640	FDD-1 Reservation	4,640	0
Heating Season Total Capacity	15,645	Heating Season Total Capacity	15,645	Heating Season Total Capacity	15,645	0
Non-Heating Season Total Capacity	12,535	Non-Heating Season Total Capacity	12,535	Non-Heating Season Total Capacity	12,535	0
Total Entitlement (Including Peak Shaving)	15,645	Total Entitlement (Including Peak Shaving)	15,645	Total Entitlement (Including Peak Shaving)	15,645	0
Total Annual Transportation	7,535	Total Annual Transportation	7,535	Total Annual Transportation	7,535	0
Total Season Transportation	8,110	Total Season Transportation	8,110	Total Season Transportation	8,110	0
Percent TF-5	31.16%	Percent TF-5	31.16%	Percent TF-5	31.16%	0.00%
Total Percent Seasonal	51.84%	Total Percent Seasonal	51.84%	Total Percent Seasonal	51.84%	0.00%

**GREAT PLAINS NATURAL GAS CO.
DEMAND ENTITLEMENT FILING 2013 - 2014 HEATING SEASON
DESIGN DAY - NOVEMBER 2013**

Area	Customer Factors 1/			Design HDD 2/	No. of Customers 3/	Projected Customers 4/	Peak/ Customer	Projected Peak Day (dk)	L&UA 5/	Projected Design	Capacity	Reserve
	Dk/day	Dk/DD	RSqr									
Crookston	0.04434	0.01230	0.98252	96	2,439	2,463	1.22514	3,018	21	3,039		
North 4	0.06051	0.01253	0.90847	91	6,884	6,976	1.20074	8,376	59	8,435		
Wahpeton	0.09583	0.01254	0.91174	91	2,109	2,140	1.23697	2,647	19	2,666		
Total North District					11,432	11,579		14,041	99	14,140	15,000	6.1%
South 13	0.04866	0.01512	0.98795	83	11,576	11,649	1.30362	15,186	107	15,293	15,645	2.3%
Total					23,008	23,228		29,227	206	29,433	30,645	4.1%

1/ Use per customer factors based on regression analysis for the 36 months ending March 2013.

2/ Design Heating Degree Days Base 60 degrees F.

3/ Reflects monthly average December 2012 - February 2013

4/ Customer growth is based on regression analysis for the 36 months ending March 2013 with composite growth rates of, Crookston = 1.00%, North = 1.33%, Wahpeton = 1.48%, South = 0.63%.

5/ Lost and Unaccounted for Gas percentage of 0.7%.

**GREAT PLAINS NATURAL GAS CO.
RATE EFFECT OF PROPOSED DEMAND - NOVEMBER 1, 2013
NORTH DISTRICT**

	Last Rate Case 1/	Last Demand Change 2/	June 2013 PGA 3/	Proposed 4/	% Change from		June 2013 PGA	Change from June 2013 PGA
					Last Rate Case	Last Demand Change		
Residential								
Commodity Cost of Gas	\$5.6571	\$3.7057	\$4.1878	\$4.1878	-26.0%	13.0%	0.0%	\$0.0000
Demand Cost of Gas	1.9635	1.5409	1.5380	1.5200	-22.6%	-1.4%	-1.2%	(0.0180)
Commodity Margin 5/	1.7671	1.7486	1.7583	1.7583	-0.5%	0.6%	0.0%	0.0000
Total Rate	9.3877	6.9952	7.4841	7.4661	-20.5%	6.7%	-0.2%	(0.0180)
Average Annual Usage (dk)	103.8	103.8	103.8	103.8				
Average Annual Cost of Gas	\$974.44	\$726.10	\$776.85	\$774.98	-20.5%	6.7%	-0.2%	(\$1.87)
Firm General Service								
Commodity Cost of Gas	\$5.6571	\$3.7057	\$4.1878	\$4.1878	-26.0%	13.0%	0.0%	\$0.0000
Demand Cost of Gas	1.9635	1.5409	1.5380	1.5200	-22.6%	-1.4%	-1.2%	(0.0180)
Commodity Margin	1.4471	1.4350	1.4447	1.4447	-0.2%	0.7%	0.0%	0.0000
Total Rate	9.0677	6.6816	7.1705	7.1525	-21.1%	7.0%	-0.3%	(0.0180)
Average Annual Usage (dk)	375.7	375.7	375.7	375.7				
Average Annual Cost of Gas	\$3,406.73	\$2,510.28	\$2,693.96	\$2,687.19	-21.1%	7.0%	-0.3%	(\$6.77)
Customer Class	Commodity Change		Demand Change		Total Change		Average Annual Bill Change	
	(\$/dk)	(Percent)	(\$/dk)	(Percent)	(\$/dk)	(Percent)		
Residential	\$0.0000	0.0%	(\$0.0180)	-1.2%	(\$0.0180)	-0.2%	(\$1.87)	
Firm General Service	0.0000	0.0%	(0.0180)	-1.2%	(0.0180)	-0.3%	(6.77)	

- 1/ Base Cost of Gas Effective January 2007 in Docket No. G004/MR-06-1141.
2/ Demand in Docket No. G004/M-12-740, effective November 1, 2012.
3/ June 2013 PGA.
4/ Proposed in this docket, G004/M-13-____ effective November 1, 2013.
5/ Includes CCRA and GAP.

**GREAT PLAINS NATURAL GAS CO.
RATE EFFECT OF PROPOSED DEMAND - NOVEMBER 1, 2013
SOUTH DISTRICT**

	Last Rate Case 1/	Last Demand Change 2/	June 2013 PGA 3/	Proposed 4/	% Change from			Change from June 2013 PGA
					Last Rate Case	Last Demand Change	June 2012 PGA	
<u>Residential</u>								
Commodity Cost of Gas	\$5.9550	\$3.6672	\$4.1569	\$4.1569	-30.2%	13.4%	0.0%	\$0.0000
Demand Cost of Gas	1.2338	1.1906	1.2030	1.1760	-4.7%	-1.2%	-2.2%	(0.0270)
Commodity Margin 5/	1.4279	1.3646	1.3743	1.3743	-3.8%	0.7%	0.0%	0.0000
Total Rate	8.6167	6.2224	6.7342	6.7072	-22.2%	7.8%	-0.4%	(0.0270)
Average Annual Usage (dk)	88.2	88.2	88.2	88.2				
Average Annual Cost of Gas	\$759.99	\$548.82	\$593.96	\$591.58	-22.2%	7.8%	-0.4%	(2.3800)
<u>Firm General Service</u>								
Commodity Cost of Gas	\$5.9550	\$3.6672	\$4.1569	\$4.1569	-30.2%	13.4%	0.0%	0.0000
Demand Cost of Gas	1.2338	1.1906	1.2030	1.1760	-4.7%	-1.2%	-2.2%	(0.0270)
Commodity Margin	1.1775	1.1168	1.1265	1.1265	-4.3%	0.9%	0.0%	0.0000
Total Rate	8.3663	5.9746	6.4864	6.4594	-22.8%	8.1%	-0.4%	(0.0270)
Average Annual Usage (dk)	340.9	340.9	340.9	340.9				
Average Annual Cost of Gas	\$2,852.07	\$2,036.74	\$2,211.21	\$2,202.01	-22.8%	8.1%	-0.4%	(9.2000)
<u>Customer Class</u>								
	Commodity Change		Demand Change		Total Change		Average Annual	
	(\$/dk)	(Percent)	(\$/dk)	(Percent)	(\$/dk)	(Percent)	Bill Change	
Residential	\$0.0000	0.0%	(\$0.0270)	-2.2%	(\$0.0270)	-0.4%	(\$2.3800)	
Firm General Service	0.0000	0.0%	(0.0270)	-2.2%	(0.0270)	-0.4%	(9.2000)	

- 1/ Base Cost of Gas Effective January 2007 in Docket No. G004/MR-06-1141.
2/ Demand in Docket No. G004/M-11-740, effective November 1, 2012.
3/ June 2013 PGA.
4/ Proposed in this docket, G004/M-13-____ effective November 1, 2013.
5/ Includes CCRA and GAP.

**GREAT PLAINS NATURAL GAS CO.
DEMAND ENTITLEMENT ANALYSIS
NORTH DISTRICT**

Heating Season	Number of Firm Customers			Design Day Requirement			Total Entitlement + Storage + Peak Shaving			
	(1) Number of Customers	(2) Change From Previous Year	(3) % Change From Previous Year	(4) Design Day (dk)	(5) Change From Previous Year	(6) % Change From Previous Year	(7) Total Entitlement (dk)	(8) Change From Previous Year	(9) % Change From Previous Year	(10) % of Reserve Margin [(7)-(4)]/(4)
2013-2014	11,579	172	1.51%	14,140	(104)	-0.73%	15,000	0	0.00%	6.08%
2012-2013	11,407	177	1.58%	14,244	176	1.25%	15,000	159	1.07%	5.31%
2011-2012	11,230	48	0.43%	14,068	(96)	-0.68%	14,841	(1,000)	-6.31%	5.49%
2010-2011	11,182	(12)	-0.11%	14,164	(248)	-1.72%	15,841	0	0.00%	11.84%
2009-2010	11,194	8	0.07%	14,412	(37)	-0.26%	15,841	(1,000)	-5.94%	9.92%
2008-2009	11,186	41	0.37%	14,449	(413)	-2.78%	16,841	0	0.00%	16.55%
2007-2008	11,145	28	0.25%	14,862	(289)	-1.91%	16,841	0	0.00%	13.32%
2006-2007	11,117	(64)	-0.57%	15,151	(673)	-4.25%	16,841	0	0.00%	11.15%
2005-2006	11,181	81	0.73%	15,824	(49)	-0.31%	16,841	0	0.00%	6.43%
2004-2005	11,100	25	0.23%	15,873	(121)	-0.76%	16,841	0	0.00%	6.10%
2003-2004 1/	11,075	2,375	27.30%	15,994	2,559	19.05%	16,841	4,154	32.74%	5.30%
2002-2003	8,700	180	2.11%	13,435	(1,231)	-8.39%	12,687	(2,780)	-17.97%	-5.57%
2001-2002	8,520	19	0.22%	14,666	212	1.47%	15,467	0	0.00%	5.46%
2000-2001	8,501	304	3.71%	14,454	0	0.00%	15,467	0	0.00%	7.01%
1999-2000	8,197	82	1.01%	14,454	618	4.47%	15,467	0	0.00%	7.01%
1998-1999	8,115	227	2.88%	13,836	244	1.80%	15,467	0	0.00%	11.79%
1997-1998	7,888	215	2.80%	13,592	2,415	21.61%	15,467	3,950	34.30%	13.79%
1996-1997	7,673	267	3.61%	11,177	379	3.51%	11,517	1,459	14.51%	3.04%
1995-1996	7,406			10,798			10,058			-6.85%
Annual Average			2.67%			1.74%			2.91%	7.01%

Heating Season	Firm Peak Day Sendout			(14) Excess Per Customer [(7)-(4)]/(1)	(15) Design Day per Customer (4)/(1)	(16) Entitlement per Customer (7)/(1)	(17) Peak Day Sendout per Customer (11)/(1)
	(11) Firm Peak Day Sendout (dk)	(12) Change From Previous Year	(13) % Change From Previous Year				
2013-2014				0.0743	1.2212	1.2954	
2012-2013	11,706	3,265	38.68%	0.0663	1.2487	1.3150	1.0262
2011-2012	8,441	(2,617)	-23.67%	0.0688	1.2527	1.3215	0.7516
2010-2011	11,058	2,134	23.91%	0.1500	1.2667	1.4167	0.9889
2009-2010	8,924	(769)	-7.93%	0.1277	1.2875	1.4151	0.7972
2008-2009	9,693	(348)	-3.47%	0.2138	1.2917	1.5055	0.8665
2007-2008	10,041	451	4.70%	0.1776	1.3335	1.5111	0.9009
2006-2007	9,590	43	0.45%	0.1520	1.3629	1.5149	0.8626
2005-2006	9,547	(923)	-8.82%	0.0910	1.4153	1.5062	0.8539
2004-2005	10,470	(942)	-8.25%	0.0872	1.4300	1.5172	0.9432
2003-2004	11,412	1,606	16.38%	0.0765	1.4442	1.5206	1.0304
2002-2003	9,806	(3,572)	-26.70%	(0.0860)	1.5443	1.4583	1.1271
2001-2002	13,378	1,699	14.55%	0.0940	1.7214	1.8154	1.5702
2000-2001	11,679	(1,699)	-12.70%	0.1192	1.7003	1.8194	1.3738
1999-2000	13,378	2,196	19.64%	0.1236	1.7633	1.8869	1.6321
1998-1999	11,182	(748)	-6.27%	0.2010	1.7050	1.9060	1.3779
1997-1998	11,930	267	2.29%	0.2377	1.7231	1.9608	1.5124
1996-1997	11,663	551	4.96%	0.0443	1.4567	1.5010	1.5200
1995-1996	11,112			(0.0999)	1.4580	1.3581	1.5004
Annual Average			1.63%	0.1010	1.4540	1.5550	1.1464

1/ Crookston was consolidated with the North District in 2003.

**GREAT PLAINS NATURAL GAS CO.
DEMAND ENTITLEMENT ANALYSIS
SOUTH DISTRICT**

Heating Season	Number of Firm Customers			Design Day Requirement			Total Entitlement + Storage + Peak Shaving			
	(1) Number of Customers	(2) Change From Previous Year	(3) % Change From Previous Year	(4) Design Day (dk)	(5) Change From Previous Year	(6) % Change From Previous Year	(7) Total Entitlement (dk)	(8) Change From Previous Year	(9) % Change From Previous Year	(10) % of Reserve Margin [(7)-(4)]/(4)
2013-2014	11,649	118	1.02%	15,293	443	2.98%	15,645	0	0.00%	2.30%
2012-2013	11,531	(13)	-0.11%	14,850	(18)	-0.12%	15,645	0	0.00%	5.35%
2011-2012	11,544	(8)	-0.07%	14,868	(297)	-1.96%	15,645	(380)	-2.37%	5.23%
2010-2011	11,552	10	0.09%	15,165	(267)	-1.73%	16,025	(1,170)	-6.80%	5.67%
2009-2010	11,542	77	0.67%	15,432	156	1.02%	17,195	(170)	-0.98%	11.42%
2008-2009	11,465	8	0.07%	15,276	(301)	-1.93%	17,365	0	0.00%	13.68%
2007-2008	11,457	(27)	-0.24%	15,577	(117)	-0.75%	17,365	0	0.00%	11.48%
2006-2007	11,484	(224)	-1.91%	15,694	(699)	-4.26%	17,365	0	0.00%	10.65%
2005-2006	11,708	(92)	-0.78%	16,393	(336)	-2.01%	17,365	0	0.00%	5.93%
2004-2005	11,800	60	0.51%	16,729	92	0.55%	17,365	0	0.00%	3.80%
2003-2004	11,740	40	0.34%	16,637	(413)	-2.42%	17,365	0	0.00%	4.38%
2002-2003	11,700	76	0.65%	17,050	(2,058)	-10.77%	17,365	(2,600)	-13.02%	1.85%
2001-2002	11,624	189	1.65%	19,108	7	0.04%	19,965	0	0.00%	4.49%
2000-2001	11,435	(41)	-0.36%	19,101	0	0.00%	19,965	0	0.00%	4.52%
1999-2000	11,476	280	2.50%	19,101	340	1.81%	19,965	0	0.00%	4.52%
1998-1999	11,196	(25)	-0.22%	18,761	374	2.03%	19,965	0	0.00%	6.42%
1997-1998	11,221	306	2.80%	18,387	431	2.40%	19,965	2,000	11.13%	8.58%
1996-1997	10,915	235	2.20%	17,956	353	2.01%	17,965	1,008	5.94%	0.05%
1995-1996	10,680			17,603			16,957			-3.67%
Annual Average			0.49%			-0.73%			-0.34%	5.61%

Heating Season	Firm Peak Day Sendout			(14)	(15)	(16)	(17)
	(11) Firm Peak Day Sendout (dk)	(12) Change From Previous Year	(13) % Change From Previous Year	Excess Per Customer [(7)-(4)]/(1)	Design Day per Customer (4)/(1)	Entitlement per Customer (7)/(1)	Peak Day Sendout per Customer (11)/(1)
2013-2014				0.0302	1.3128	1.3430	
2012-2013	12,516	2,248	21.89%	0.0689	1.2878	1.3568	1.0854
2011-2012	10,268	(1,652)	-13.86%	0.0673	1.2879	1.3552	0.8895
2010-2011	11,920	(692)	-5.49%	0.0744	1.3128	1.3872	1.0319
2009-2010	12,612	(962)	-7.09%	0.1527	1.3370	1.4898	1.0927
2008-2009	13,574	888	7.00%	0.1822	1.3324	1.5146	1.1840
2007-2008	12,686	401	3.26%	0.1561	1.3596	1.5157	1.1073
2006-2007	12,285	(789)	-6.03%	0.1455	1.3666	1.5121	1.0697
2005-2006	13,074	(996)	-7.08%	0.0830	1.4002	1.4832	1.1167
2004-2005	14,070	(626)	-4.26%	0.0539	1.4177	1.4716	1.1924
2003-2004	14,696	425	2.98%	0.0620	1.4171	1.4791	1.2518
2002-2003	14,271	2,151	17.75%	0.0269	1.4573	1.4842	1.2197
2001-2002	12,120	(2,724)	-18.35%	0.0737	1.6438	1.7176	1.0427
2000-2001	14,844	(1,921)	-11.46%	0.0756	1.6704	1.7460	1.2981
1999-2000	16,765	828	5.20%	0.0753	1.6644	1.7397	1.4609
1998-1999	15,937	(133)	-0.83%	0.1075	1.6757	1.7832	1.4235
1997-1998	16,070	115	0.72%	0.1406	1.6386	1.7793	1.4321
1996-1997	15,955	(418)	-2.55%	0.0008	1.6451	1.6459	1.4617
1995-1996	16,373			(0.0605)	1.6482	1.5877	1.5331
Annual Average			-1.07%	0.0798	1.4671	1.5469	1.2163