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October 30, 2020

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

Re: Docket No. G004/M-20-562
Informational Update Filing on Great Plains' 2020 Demand Entitlement Filing

Dear Mr. Seuffert:

Great Plains Natural Gas Co. (Great Plains), a Division of Montana-Dakota Utilities Co., submitted its Demand Entitlement Filing on July 1, 2020 (July 1 DEQ) in the above referenced docket.

Capacity Releases:

Great Plains' proposed demand profile included two capacity releases: 2,000 dk on Viking Gas Transmission (VGT) and 900 dk on Northern Natural Gas (NNG). Great Plains has proposed these capacity releases to defray the cost of currently subscribed excess capacity.

Pursuant to the April 27, 2020 in Docket No. G004/M-19-430, the Company has provided information regarding its efforts to release capacity. Great Plains utilized the electronic bulletin boards in its marketing efforts for the respective suppliers to post the proposed capacity releases for bids during October 2020. The 2,000 dk capacity release on VGT has been contracted to a purchaser at a rate of \$3.9200 per dk for the period November 2020 through March 2021. The 900 dk capacity release on NNG received no bids. Great Plains will continue to post this release to NNG's electronic bulletin board throughout the heating season in the hopes of a purchaser placing a bid. The NNG capacity release would impact Great Plains' reserve margin from its currently proposed 9.5% to 6.8%, a decrease of approximately 28%.

The only impediment Great Plains has encountered to release the excess capacity is the lack of buyer bids on NNG's electronic bulletin board. Please see the Updated Demand Costs section for further discussion on the impact of the changes to the capacity releases that Great Plains has included in its proposed demand entitlement profile.

TF12 Reallocation:

As stated in the July 1 DEQ filing, Great Plains agreed to update the Commission on the allocation of NNG TF12 Base and TF12 Variable in place for the 2020 - 2021 season. Great Plains was informed that NNG is increasing the TF12 Base by 115 dk to 4,036 dk per day, while decreasing the TF12 Variable by 115 dk to 3,499 dk per day. This new allocation will be effective November 1, 2020.

Table 1
TF12 Changes to Initial Filing

	Initial Filing (Dk)	Change (Dk)	Update (Dk)
TF12 Base	3,921	115	4,036
TF12 Variable	3,614	(115)	3,499

Updated Demand Costs:

At the time the July 1 DEQ filing was prepared, Great Plains proposed to lower the amount of FT-A capacity released on VGT by 200 Dk from 2,200 Dk to 2,000 Dk at an estimated rate of \$0.9000 per dk. Great Plains' Gas Supply Department was able to secure a contract for the 2,000 Dk/day capacity release via a bidder on VGT's electronic bulletin board for the period of November 2020 through March 2021 at a rate of \$3.9200 per Dk per month.

Great Plains also proposed in its July 1 DEQ filing to release 900 Dk/day of currently contracted NNG capacity. This capacity release has not been secured with a purchaser at this time; however, Great Plains will continue to post this release on NNG's electronic bulletin board in the hopes of securing a deal with a purchaser. Great Plains has excluded this release in its proposed demand entitlement, but should this 900 Dk/day of capacity release be executed, it will place Great Plains' demand entitlement quantity at the original level represented in the July 1 filing to which an update will be provided.

After incorporating the changes mentioned above, the 2020 - 2021 heating season capacity reserve is 9.5%, which is above Great Plains' proposed reserve margin of 6.8% from the July 1 DEQ filing.

Despite the Company's inability to obtain a bidder for its NNG capacity release, the total cost of demand is \$26,137 less than that presented in the July 1 filing. The demand costs to be effective November 1, 2020 are reflected in Table 2, below:

Table 2
Updated Demand Costs

Interstate Pipelines	Volumes Dk/day	Rates \$	Months	Demand Costs \$
<u>VGT</u>				
FT-A - Zone 1-1 (Cat. 3)	8,000	\$3.8060	12	\$365,376
FT-A - Zone 1-1 (Cat. 3)	5,000	3.8060	12	228,360
FT-A Seasonal (Cat. 3)	2,000	3.8060	5	38,060
FT-A - Zone 1-1 (Cat. 3)	5,000	3.8060	12	228,360
FT-A - Capacity Release	(2,000)	3.9200	5	(39,200)
<u>NNG</u>				
TFX - Summer	13,000	7.3030	7	664,573
TFX - Winter	13,000	19.4710	5	1,265,615
TFX Seasonal (November - March)	2,000	19.4710	5	194,710
TF12 Base - Summer	4,036	7.3030	7	206,324
TF12 Base - Winter	4,036	13.1450	5	265,266
TF12 Variable - Summer	3,499	7.3030	7	178,872
TF12 Variable - Winter	3,499	17.8180	5	311,726
TF5	3,410	19.4710	5	331,981
TFX - Winter	5,200	19.4710	5	506,246
TFX - Annual (Summer Rate)	2,000	7.3030	7	102,242
TFX - Annual (Winter Rate)	2,000	19.4710	5	194,710
TFX Negotiated Contract - Winter	1,000	26.8918	5	134,459
FDD-1 Reservation	4,640	2.8624	12	159,378
Interruptible Demand Credit				(697,086)
Total Demand Charges				\$4,639,972

The annual updated demand effect is an increase of \$0.0042 per dk as shown on Exhibit C. Please see Table 3 below for the annual demand rate impacts, as effective October 1, 2020 and reflecting the changes noted above.

Table 3
Annual Demand Rate Impacts

Effective date	Residential Customer (77.9 Dk)	Total Change Res	Firm General Service (434.4 Dk)	Total Change FGS
October 1, 2020	\$113.48		\$632.83	
Change due to update	\$0.33	0.3%	\$1.83	0.3%
November 1, 2020	\$113.81		\$634.66	

Great Plains' analysis indicates that the portfolio in place for the 2020-2021 heating season will allow the Company to adequately serve customers.

In support of updating Docket No. G004/M-20-562, Great Plains has updated the following exhibits to show the impact of the changes listed above.

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

Per the Department's request in its Response Comments to Docket No. G004/M-15-645, dated August 31, 2016, Great Plains has included a red-line version of the Exhibits. Please see Exhibit E.

If you have any questions regarding this filing, please contact me at (701) 222-7855 or Brian M. Meloy, at (612) 335-1451.

Sincerely,

/s/ Travis R. Jacobson

Travis R. Jacobson
Director of Regulatory Affairs

cc: Brian M. Meloy

**GREAT PLAINS NATURAL GAS CO.
DEMAND ENTITLEMENT FILING 2020 - 2021 HEATING SEASON
DESIGN DAY - NOVEMBER 2020
-UPDATE-**

Pipeline	Customer Factors 1/		Design HDD 2/	No. of Customers 3/	Projected Customers 4/	Peak/ Customer	Projected Peak Day (dk)	L&UA 5/	Projected Design	Proposed Capacity	Reserve
	Dk/day	Dk/DD									
VGT											
Crookston	0.04450	0.01403	0.99575	2,595	2,622	1.39138	3,647	26	3,673		
North 4	0.05371	0.01393	0.99845	7,294	7,342	1.32134	9,706	68	9,774		
Wahpeton	0.06995	0.01417	0.99818	2,275	2,285	1.35942	3,107	22	3,129		
Total VGT				<u>12,164</u>	<u>12,249</u>		<u>16,460</u>	<u>116</u>	<u>16,576</u>		
NNG											
	0.05198	0.01642	0.99750	12,117	12,176	1.41484	17,225	121	17,346		
Total				<u>24,281</u>	<u>24,425</u>		<u>33,685</u>	<u>237</u>	<u>33,922</u>	<u>37,145</u>	<u>9.5%</u>

1/ Use per customer factors based on regression analysis for the 36 months ending March 2020.

2/ Design Heating Degree Days Base 60 degrees F.

3/ Reflects monthly average for December 2019 - February 2020.

4/ Customer growth is based on regression analysis for the 36 months ending March 2020 with composite growth rates of: Crookston = 1.04%, North = 0.66%, Wahpeton = 0.44%, South = 0.59%.

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

GREAT PLAINS NATURAL GAS CO.
DEMAND ENTITLEMENT FILING 2020 - 2021 HEATING SEASON
DEMAND PROFILE EFFECTIVE NOVEMBER 1, 2020
-UPDATE-

<u>Type of Capacity or Entitlement</u>	<u>Authorized Amount</u>	<u>Proposed Change</u>	<u>Proposed Amount</u>	<u>Contract Length</u>	<u>Expiration Date</u>
<u>Demand Profile (dk) 1/</u>					
<u>VGT</u>					
FT-A - Zone 1-1 (Cat. 3)	8,000	0	8,000	5 years	10/31/2022
FT-A - Zone 1-1 (Cat. 3)	5,000	0	5,000	5 years	10/31/2022
FT-A Seasonal - Zone 1-1 (Cat. 3)	2,000	0	2,000	5 years	10/31/2022
FT-A - Zone 1-1 (Cat. 3)	5,000	0	5,000	5 years	10/31/2023
FT-A - Capacity Release	(2,200)	200	(2,000)	5 months	3/31/2021
<u>NNG</u>					
TF12 Base (Summer & Winter)	3,921	115	4,036	5 years	10/31/2024
TF12 Variable (Summer & Winter)	3,614	(115)	3,499	5 years	10/31/2024
TF5 (November - March)	3,410	0	3,410	5 years	10/31/2024
TFX Negotiated (November - March)	1,000	0	1,000	10.5 years	3/31/2025
TFX Seasonal (November - March)	5,200	0	5,200	5 years	10/31/2024
TFX (Annual)	2,000	0	2,000	10 years	10/31/2025
Subtotal	36,945	200	37,145		
<u>Supplemental Capacity</u>					
TFX Seasonal (November - March)	2,000	0	2,000	5 years	10/31/2024
TFX (Annual)	13,000	0	13,000	11.5 years	3/31/2024
<u>Storage</u>					
FDD-1 Reservation	4,640	0	4,640	5 years	5/31/2024
Heating Season Total Capacity:	36,945	200	37,145		
Non-Heating Season Total Capacity:	27,535	0	27,535		
Forecasted Heating Season Design Day:	34,066	(144)	33,922		
Estimated Non-Heating Season Design Day:	18,460	192	18,652		
Heating Season Capacity: Surplus/(Shortage)	2,879	344	3,223		
Non-Heating Season Capacity: Surplus/(Shortage)	9,075	(192)	8,883		

1/ Minnesota communities plus Wahpeton, ND.

**GREAT PLAINS NATURAL GAS CO.
DEMAND PROFILE
-UPDATE-**

2018-2019 Heating Season G004/M-18-454	Quantity (dk)	2019-2020 Heating Season G004/M-19-430	Quantity (dk)	2020-2021 Heating Season G004/M-20-562	Quantity (dk)	Difference
FT-A (Cat. 3) (12 months)	8,000	FT-A (Cat. 3) (12 months)	8,000	FT-A (Cat. 3) (12 months)	8,000	0
FT-A (Cat. 3) (12 months)	10,000	FT-A (Cat. 3) (12 months)	10,000	FT-A (Cat. 3) (12 months)	10,000	0
FT-A (Cat. 3) (November - March)	2,000	FT-A (Cat. 3) (November - March)	2,000	FT-A (Cat. 3) (November - March)	2,000	0
FT-A (November - March)	-	FT-A (November - March)	-	FT-A (November - March)	-	0
FT-A - Capacity Release	(2,600)	FT-A - Capacity Release	(2,200)	FT-A - Capacity Release	(2,000)	200
TFX (12 months) 1/	13,000	TFX (12 months) 1/	13,000	TFX (12 months) 1/	13,000	0
TFX (November - March) 1/	2,000	TFX (November - March) 1/	2,000	TFX (November - March) 1/	2,000	0
TF-12 Base	3,819	TF-12 Base	3,921	TF-12 Base	4,036	115
TF-12 Variable	3,716	TF-12 Variable	3,614	TF-12 Variable	3,499	(115)
TF-5 (November- March)	3,410	TF-5 (November- March)	3,410	TF-5 (November- March)	3,410	0
TFX (November - March)	5,200	TFX (November - March)	5,200	TFX (November - March)	5,200	0
TFX - Negotiated (November - March)	1,000	TFX - Negotiated (November - March)	1,000	TFX - Negotiated (November - March)	1,000	0
TFX (Annual) 2/	2,000	TFX (Annual)	2,000	TFX (Annual)	2,000	0
TFX - Capacity Release	-	TFX - Capacity Release	-	TFX - Capacity Release	-	0
FDD-1 Reservation 1/	4,640	FDD-1 Reservation 1/	4,640	FDD-1 Reservation 1/	4,640	0
Heating Season Total Capacity 3/	35,545	Heating Season Total Capacity	36,945	Heating Season Total Capacity	37,145	200
Non-Heating Season Total Capacity	27,535	Non-Heating Season Total Capacity	27,535	Non-Heating Season Total Capacity	27,535	0
Total Entitlement 3/	35,545	Total Entitlement	36,945	Total Entitlement	37,145	200
Total Annual Transportation 3/	26,535	Total Annual Transportation	27,535	Total Annual Transportation	27,535	0
Total Season Transportation	9,010	Total Season Transportation	9,410	Total Season Transportation	9,610	200
Percent TF-5	31.16%	Percent TF-5	31.16%	Percent TF-5	31.16%	0.00%
Total Percent Seasonal	25.35%	Total Percent Seasonal	25.47%	Total Percent Seasonal	25.87%	0.40%

1/ Does not impact demand profile.

2/ Demand profile includes 1,000 dk: Remaining 1,000 dk used to deliver gas to Viking interconnect at Chisago for 1,000 dk FT-A (12 Months) 'back-haul' contract to Vergas, MN.

3/ Includes 1,000 dk of total 2,000 dk from TFX (Annual) contract for capacity and demand profile calculation.

**GREAT PLAINS NATURAL GAS CO.
RATE EFFECT OF PROPOSED DEMAND - NOVEMBER 1, 2020
NORTH DISTRICT
-UPDATE-**

	Last Rate	Last Demand	October 2020	November 2020	Last Rate	% Change from		Change from
	Case 1/ \$2.53010	Change 2/ (0.23440)	Rates 3/ (0.06280)	Proposed 4/ \$3.02100	Case 19.4%	Last Demand Change	October 2020 Rates	October 2020 Rates
Residential								
Commodity Cost of Gas	\$2.53010	\$2.43770	\$2.01710	\$3.02100	19.4%	23.9%	49.8%	\$1.00390
GCR 5/	0.07620	(0.23440)	(0.06280)	(0.06280)	-182.4%	-73.2%	0.0%	0.00000
Demand Cost of Gas	1.18900	1.26730	1.45680	1.46100	22.9%	15.3%	0.3%	0.00420
Commodity Margin 6/	1.65450	1.65450	1.65450	1.65450	0.0%	0.0%	0.0%	0.00000
CCRA 7/	0.21250	(0.03370)	(0.03370)	(0.03370)	-115.9%	0.0%	0.0%	0.00000
GAP 8/		0.01393	0.01393	0.01393	N/A	0.0%	0.0%	0.00000
GUIC 9/		0.24940	0.30410	0.30410	N/A	21.9%	0.0%	0.00000
RDM 10/		(0.38160)	(0.20380)	(0.20380)	N/A	-46.6%	0.0%	0.00000
Total Rate	\$5.66230	\$4.97313	\$5.14613	\$6.15423	8.7%	23.7%	19.6%	\$1.00810
Average Annual Usage (dk)	77.9	77.9	77.9	77.9				
Average Annual Cost of Gas	\$441.09	\$387.41	\$400.88	\$479.41	8.7%	23.7%	19.6%	\$78.54
Firm General Service								
Commodity Cost of Gas	\$2.53010	\$2.43770	\$2.01710	\$3.02100	19.4%	23.9%	49.8%	\$1.00390
GCR 5/	0.07620	(0.23440)	(0.06280)	(0.06280)	-182.4%	-73.2%	0.0%	0.00000
Demand Cost of Gas	1.18900	1.26730	1.45680	1.46100	22.9%	15.3%	0.3%	0.00420
Commodity Margin 6/	1.31930	1.31930	1.31930	1.31930	0.0%	0.0%	0.0%	0.00000
CCRA 7/	0.21250	(0.03370)	(0.03370)	(0.03370)	-115.9%	0.0%	0.0%	0.00000
GAP 8/		0.01393	0.01393	0.01393	N/A	0.0%	0.0%	0.00000
GUIC 9/		0.17920	0.18030	0.18030	N/A	0.6%	0.0%	0.00000
RDM 10/		(0.23120)	(0.12440)	(0.12440)	N/A	-46.2%	0.0%	0.00000
Total Rate	\$5.32710	\$4.71813	\$4.76653	\$5.77463	8.4%	22.4%	21.1%	\$1.00810
Average Annual Usage (dk)	434.4	434.4	434.4	434.4				
Average Annual Cost of Gas	\$2,314.09	\$2,049.56	\$2,070.58	\$2,508.50	8.4%	22.4%	21.1%	\$437.91
Customer Class								
Residential	\$1.0039	49.8%	\$0.0042	0.3%	\$1.0081	19.6%	\$78.54	
Firm General Service	1.0039	49.8%	0.0042	0.3%	1.0081	21.1%	\$437.91	

1/ Consolidated Base Cost of Gas effective July 1, 2017 in update to Docket No. G004/MR-16-834. Commodity margin effective May 1, 2019 in Docket No. E,G-999/CI-17-895.
2/ Demand in Docket No. G004/M-19-430, effective November 1, 2019.
3/ Most recently filed PGA: October 2020.
4/ Includes seasonal capacity release of 2,000 Dk.
5/ GCR rate of \$0.0762 (effective September 1, 2018 - Docket No. G004/AA-18-374); GCR rate of (\$0.2344).
6/ Includes CCRC of \$0.0556 (effective January 1, 2017 - Docket No. G004/GR-15-879).
7/ CCRA of \$0.2125 (effective January 1, 2017 - Docket No. G004/M-16-384); CCRA rate of (\$0.0337) (effective August 1, 2019 - Docket No. G004/M-19-273).
8/ Effective with service rendered on and after June 1, 2017 - Docket No. G004/M-16-495.
9/ Effective with service rendered on and after March 1, 2019 - Docket No. G004/M-18-282 and October 1, 2020 - Docket No. G004/M-20-422.
10/ Effective with service rendered on and after April 1, 2019 - Docket No. G004/GR-15-879; April 1, 2020 - Docket No. G004/M-20-335.

**GREAT PLAINS NATURAL GAS CO.
RATE EFFECT OF PROPOSED DEMAND - NOVEMBER 1, 2020
SOUTH DISTRICT
-UPDATE-**

	Last Rate	Last Demand	October 2020	November 2020	Last Rate	% Change from		Change from
	Case 1/ \$	Change 2/ \$	Rates 3/ \$	Proposed 4/ \$	Case	Last Demand	October 2020	October 2020
						Change	Rates	Rates
Residential								
Commodity Cost of Gas	\$2.53010	\$2.43770	\$2.01710	\$3.02100	19.4%	23.9%	49.8%	\$1.00390
GCR 5/	0.16270	(0.23440)	(0.06280)	(0.06280)	-138.6%	-73.2%	0.0%	0.00000
Demand Cost of Gas	1.18900	1.26730	1.45680	1.46100	22.9%	15.3%	0.3%	0.00420
Commodity Margin 6/	1.65450	1.65450	1.65450	1.65450	0.0%	0.0%	0.0%	0.00000
CCRA 7/	0.21250	(0.03370)	(0.03370)	(0.03370)	-115.9%	0.0%	0.0%	0.00000
GAP 8/		0.01393	0.01393	0.01393	N/A	0.0%	0.0%	0.00000
GUIC 9/		0.24940	0.30410	0.30410	N/A	21.9%	0.0%	0.00000
RDM 10/		(0.30500)	(0.20470)	(0.20470)	N/A	-32.9%	0.0%	0.00000
Total Rate	\$5.74880	\$5.04973	\$5.14523	\$6.15333	7.0%	21.9%	19.6%	\$1.00810
Average Annual Usage (dk)	77.9	77.9	77.9	77.9				
Average Annual Cost of Gas	\$447.83	\$393.37	\$400.81	\$479.34	7.0%	21.9%	19.6%	\$78.54
Firm General Service								
Commodity Cost of Gas	\$2.53010	\$2.43770	\$2.01710	\$3.02100	19.4%	23.9%	49.8%	\$1.00390
GCR 5/	0.16270	(0.23440)	(0.06280)	(0.06280)	-138.6%	-73.2%	0.0%	0.00000
Demand Cost of Gas	1.18900	1.26730	1.45680	1.46100	22.9%	15.3%	0.3%	0.00420
Commodity Margin 6/	1.31930	1.31930	1.31930	1.31930	0.0%	0.0%	0.0%	0.00000
CCRA 7/	0.21250	(0.03370)	(0.03370)	(0.03370)	-115.9%	0.0%	0.0%	0.00000
GAP 8/		0.01393	0.01393	0.01393	N/A	0.0%	0.0%	0.00000
GUIC 9/		0.17920	0.18030	0.18030	N/A	0.6%	0.0%	0.00000
RDM 10/		(0.07420)	0.00900	0.00900	N/A	-112.1%	0.0%	0.00000
Total Rate	\$5.41360	\$4.87513	\$4.89993	\$5.90803	9.1%	21.2%	20.6%	\$1.00810
Average Annual Usage (dk)	434.4	434.4	434.4	434.4				
Average Annual Cost of Gas	\$2,351.67	\$2,117.76	\$2,128.53	\$2,566.45	9.1%	21.2%	20.6%	\$437.91
Customer Class								
Residential	\$1.0039	49.8%	\$0.0042	0.3%	\$1.0081	19.6%	Avg. Annual	Bill Change
Firm General Service	1.0039	49.8%	0.0042	0.3%	1.0081	20.6%		\$437.91

- 1/ Consolidated Base Cost of Gas effective July 1, 2017 in update to Docket No. G004/MR-16-834. Commodity margin effective May 1, 2019 in Docket No. E,G-999/CI-17-895.
- 2/ Demand in Docket No. G004/M-19-430, effective November 1, 2019.
- 3/ Most recently filed PGA: October 2020.
- 4/ Includes seasonal capacity release of 2,000 Dk.
- 5/ GCR rate of \$0.0762 (effective September 1, 2018 - Docket No. G004/AA-18-374); GCR rate of (\$0.2344).
- 6/ Includes CCRC of \$0.0556 (effective January 1, 2017 - Docket No. G004/GR-15-879).
- 7/ CCRA of \$0.2125 (effective January 1, 2017 - Docket No. G004/M-16-384); CCRA rate of (\$0.0337) (effective August 1, 2019 - Docket No. G004/M-19-273).
- 8/ Effective with service rendered on and after June 1, 2017 - Docket No. G004/M-16-495.
- 9/ Effective with service rendered on and after March 1, 2019 - Docket No. G004/M-18-282 and October 1, 2020 - Docket No. G004/M-20-422.
- 10/ Effective with service rendered on and after April 1, 2019 - Docket No. G004/GR-15-879; April 1, 2020 - Docket No. G004/M-20-335.

**GREAT PLAINS NATURAL GAS CO.
DEMAND ENTITLEMENT ANALYSIS
-UPDATE-**

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)
2020-2021	24,425	109	0.45%	33,922	(144)	-0.42%	37,145	200	0.54%	9.50%
2019-2020	24,316	76	0.31%	34,066	392	1.16%	36,945	1,400	3.94%	8.45%
2018-2019	24,240	243	1.01%	33,674	941	2.87%	35,545	1,100	3.19%	5.56%
2017-2018	23,997	184	0.77%	32,733	335	1.03%	34,445	200	0.58%	5.23%
Annual Average			0.64%			1.16%			2.06%	7.19%

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	(12) Change From Previous Year	(13) % Change From Previous Year				
2020-2021	28,451	(1,869)	-6.16%	0.1320	1.3888	1.5208	1.1701
2019-2020	30,320	1,679	5.86%	0.1184	1.4010	1.5194	1.2508
2018-2019	28,641	112	0.39%	0.0772	1.3892	1.4664	1.1935
Annual Average			0.03%	0.0997	1.3858	1.4855	1.2048

**GREAT PLAINS NATURAL GAS CO.
DEMAND ENTITLEMENT FILING 2020 - 2021 HEATING SEASON
DESIGN DAY - NOVEMBER 2020
-UPDATE-**

Pipeline	Customer Factors 1/		Design HDD 2/	No. of Customers 3/	Projected Customers 4/	Peak/ Customer	Projected Peak Day (dk)	L&UA 5/	Projected Design	Proposed Capacity	Reserve
	Dk/day	Dk/DD									
VGT											
Crookston	0.04450	0.01403	0.99575	2,595	2,622	1.39138	3,647	26	3,673		
North 4	0.05371	0.01393	0.99845	7,294	7,342	1.32134	9,706	68	9,774		
Wahpeton	0.06995	0.01417	0.99818	2,275	2,285	1.35942	3,107	22	3,129		
Total VGT				<u>12,164</u>	<u>12,249</u>		<u>16,460</u>	<u>116</u>	<u>16,576</u>		
NNG											
	0.05198	0.01642	0.99750	12,117	12,176	1.41484	17,225	121	17,346		
Total				<u>24,281</u>	<u>24,425</u>		<u>33,685</u>	<u>237</u>	<u>33,922</u>	<u>36,245</u>	<u>6.8%</u> 9.5%

1/ Use per customer factors based on regression analysis for the 36 months ending March 2020.

2/ Design Heating Degree Days Base 60 degrees F.

3/ Reflects monthly average for December 2019 - February 2020.

4/ Customer growth is based on regression analysis for the 36 months ending March 2020 with composite growth rates of: Crookston = 1.04%, North = 0.66%, Wahpeton = 0.44%, South = 0.59%.

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

GREAT PLAINS NATURAL GAS CO.
DEMAND ENTITLEMENT FILING 2020 - 2021 HEATING SEASON
DEMAND PROFILE EFFECTIVE NOVEMBER 1, 2020
-UPDATE-

<u>Type of Capacity or Entitlement</u>	<u>Authorized Amount</u>	<u>Proposed Change</u>	<u>Proposed Amount</u>	<u>Contract Length</u>	<u>Expiration Date</u>
<u>Demand Profile (dk) 1/</u>					
<u>VGT</u>					
FT-A - Zone 1-1 (Cat. 3)	8,000	0	8,000	5 years	10/31/2022
FT-A - Zone 1-1 (Cat. 3)	5,000	0	5,000	5 years	10/31/2022
FT-A Seasonal - Zone 1-1 (Cat. 3)	2,000	0	2,000	5 years	10/31/2022
FT-A - Zone 1-1 (Cat. 3)	5,000	0	5,000	5 years	10/31/2023
FT-A - Capacity Release	(2,200)	200	(2,000)	5 months	3/31/2021
<u>NNG</u>					
TF12 Base (Summer & Winter)	3,921	0 115	3,921 4,036	5 years	10/31/2024
TF12 Variable (Summer & Winter)	3,614	0 (115)	3,614 3,499	5 years	10/31/2024
TF5 (November - March)	3,410	0	3,410	5 years	10/31/2024
TFX Negotiated (November - March)	1,000	0	1,000	10.5 years	3/31/2025
TFX Seasonal (November - March)	5,200	0	5,200	5 years	10/31/2024
TFX (Annual)	2,000	0	2,000	10 years	10/31/2025
TFX - Capacity Release	0	(900)	(900)	5 months	3/31/2021
Subtotal	<u>36,945</u>	<u>(700) 200</u>	<u>36,245 37,145</u>		
<u>Supplemental Capacity</u>					
TFX Seasonal (November - March)	2,000	0	2,000	5 years	10/31/2024
TFX (Annual)	13,000	0	13,000	11.5 years	3/31/2024
<u>Storage</u>					
FDD-1 Reservation	4,640	0	4,640	5 years	5/31/2024
Heating Season Total Capacity:	36,945	(700) 200	36,245 37,145		
Non-Heating Season Total Capacity:	27,535	0	27,535		
Forecasted Heating Season Design Day:	34,066	(144)	33,922		
Estimated Non-Heating Season Design Day:	18,460	192	18,652		
Heating Season Capacity: Surplus/(Shortage)	2,879	(556) 344	2,323 3,223		
Non-Heating Season Capacity: Surplus/(Shortage)	9,075	(192)	8,883		

1/ Minnesota communities plus Wahpeton, ND.

**GREAT PLAINS NATURAL GAS CO.
DEMAND PROFILE
-UPDATE-**

2018-2019 Heating Season G004/M-18-454	Quantity (dk)	2019-2020 Heating Season G004/M-19-430	Quantity (dk)	2020-2021 Heating Season G004/M-20-562	Quantity (dk)	Difference
FT-A (Cat. 3) (12 months)	8,000	FT-A (Cat. 3) (12 months)	8,000	FT-A (Cat. 3) (12 months)	8,000	0
FT-A (Cat. 3) (12 months)	10,000	FT-A (Cat. 3) (12 months)	10,000	FT-A (Cat. 3) (12 months)	10,000	0
FT-A (Cat. 3) (November - March)	2,000	FT-A (Cat. 3) (November - March)	2,000	FT-A (Cat. 3) (November - March)	2,000	0
FT-A (November - March)	-	FT-A (November - March)	-	FT-A (November - March)	-	0
FT-A - Capacity Release	(2,600)	FT-A - Capacity Release	(2,200)	FT-A - Capacity Release	(2,000)	200
TFX (12 months) 1/	13,000	TFX (12 months) 1/	13,000	TFX (12 months) 1/	13,000	0
TFX (November - March) 1/	2,000	TFX (November - March) 1/	2,000	TFX (November - March) 1/	2,000	0
TF-12 Base	3,819	TF-12 Base	3,921	TF-12 Base	3,924	115
TF-12 Variable	3,716	TF-12 Variable	3,614	TF-12 Variable	3,644	(115)
TF-5 (November- March)	3,410	TF-5 (November- March)	3,410	TF-5 (November- March)	3,410	0
TFX (November - March)	5,200	TFX (November - March)	5,200	TFX (November - March)	5,200	0
TFX - Negotiated (November - March)	1,000	TFX - Negotiated (November - March)	1,000	TFX - Negotiated (November - March)	1,000	0
TFX (Annual) 2/	2,000	TFX (Annual)	2,000	TFX (Annual)	2,000	0
TFX - Capacity Release	-	TFX - Capacity Release	-	TFX - Capacity Release	(900)	(900)
FDD-1 Reservation 1/	4,640	FDD-1 Reservation 1/	4,640	FDD-1 Reservation 1/	4,640	0
Heating Season Total Capacity 3/	35,545	Heating Season Total Capacity	36,945	Heating Season Total Capacity	36,245	(700)
Non-Heating Season Total Capacity	27,535	Non-Heating Season Total Capacity	27,535	Non-Heating Season Total Capacity	27,535	0
Total Entitlement 3/	35,545	Total Entitlement	36,945	Total Entitlement	36,245	(700)
Total Annual Transportation 3/	26,535	Total Annual Transportation	27,535	Total Annual Transportation	27,535	0
Total Season Transportation	9,010	Total Season Transportation	9,410	Total Season Transportation	8,740	(700)
Percent TF-5	31.16%	Percent TF-5	31.16%	Percent TF-5	31.16%	0.00%
Total Percent Seasonal	25.35%	Total Percent Seasonal	25.47%	Total Percent Seasonal	24.03%	-1.44%

1/ Does not impact demand profile.

2/ Demand profile includes 1,000 dk: Remaining 1,000 dk used to deliver gas to Viking interconnect at Chisago for 1,000 dk FT-A (12 Months) 'back-haul' contract to Vergas, MN.

3/ Includes 1,000 dk of total 2,000 dk from TFX (Annual) contract for capacity and demand profile calculation.

GREAT PLAINS NATURAL GAS CO.
RATE EFFECT OF PROPOSED DEMAND - NOVEMBER 1, 2020
NORTH DISTRICT
-UPDATE-

	Last Rate		Last Demand		July 2020 Rates-3/		November 2020 Proposed 4/		Last Rate Case		% Change from Last Demand Change		Change from July 2020 Rates	
	Case 1/		Change 2/		Rates-3/		Proposed 4/		Case				July 2020 Rates	
Residential														
Commodity Cost of Gas	\$2.53010	\$2.43770	\$2.43770	\$1.70340	\$1.70340	4.70340-3.02100	4.70340-3.02100	4.70340-3.02100	-32.7%-19.4%	-30.1%-23.9%	0.0%	\$0.00000		
GCR 5/	0.07620	(0.23440)	(0.23440)	(0.23440)	(0.23440)	(0.06280)	(0.23440)	(0.06280)	-407.6%-182.4%	0.00%-73.2%	0.0%	0.00000		
Demand Cost of Gas	1.18900	1.26730	1.26730	1.45680	1.45680	1.46240	1.46100	1.46240	23.0% 22.9%	15.4% 15.3%	0.4%	0.00560		
Commodity Margin 6/	1.65450	1.65450	1.65450	1.65450	1.65450	1.65450	1.65450	1.65450	0.0%	0.0%	0.0%	0.00000		
CCRA 7/	0.21250	(0.03370)	(0.03370)	(0.03370)	(0.03370)	(0.03370)	(0.03370)	(0.03370)	-115.9%	0.0%	0.0%	0.00000		
GAP 8/		0.01393	0.01393	0.01393	0.01393	0.01393	0.01393	0.01393	N/A	0.0%	0.0%	0.00000		
GUIC 9/		0.24940	0.24940	0.00000	0.00000	0.18030	0.18030	0.18030	N/A	-100.0% 21.9%	N/A	0.00000		
RDM 10/		(0.38160)	(0.38160)	(0.20380)	(0.20380)	(0.20380)	(0.20380)	(0.20380)	N/A	-46.6%	0.0%	0.00000		
Total Rate	\$5.66230	\$4.97313	\$4.97313	\$4.35643	\$4.35643	4.36203	6.15423	4.36203	-23.0% 8.7%	-12.3%-23.7%	0.1%	\$0.00560		
Average Annual Usage (dk)	77.9	77.9	77.9	77.9	77.9	77.9	77.9	77.9						
Average Annual Cost of Gas	\$441.09	\$387.41	\$387.41	\$339.37	\$339.37	339.80	479.41	339.80	-23.0% 8.7%	-12.3%-23.7%	0.1%	\$0.44		
Firm General Service														
Commodity Cost of Gas	\$2.53010	\$2.43770	\$2.43770	\$1.70340	\$1.70340	4.70340-3.02100	4.70340-3.02100	4.70340-3.02100	-32.7%-19.4%	-30.1%-23.9%	0.0%	\$0.00000		
GCR 5/	0.07620	(0.23440)	(0.23440)	(0.23440)	(0.23440)	(0.06280)	(0.23440)	(0.06280)	-407.6%-182.4%	0.00%-73.2%	0.0%	0.00000		
Demand Cost of Gas	1.18900	1.26730	1.26730	1.45680	1.45680	1.46240	1.46100	1.46240	23.0% 22.9%	15.4% 15.3%	0.4%	0.00560		
Commodity Margin 6/	1.31930	1.31930	1.31930	1.31930	1.31930	1.31930	1.31930	1.31930	0.0%	0.0%	0.0%	0.00000		
CCRA 7/	0.21250	(0.03370)	(0.03370)	(0.03370)	(0.03370)	(0.03370)	(0.03370)	(0.03370)	-115.9%	0.0%	0.0%	0.00000		
GAP 8/		0.01393	0.01393	0.01393	0.01393	0.01393	0.01393	0.01393	N/A	0.0%	0.0%	0.00000		
GUIC 9/		0.17920	0.17920	0.00000	0.00000	0.18030	0.18030	0.18030	N/A	-100.0% 0.06%	N/A	0.00000		
RDM 10/		(0.23120)	(0.23120)	(0.12440)	(0.12440)	(0.12440)	(0.12440)	(0.12440)	N/A	-46.2%	0.0%	0.00000		
Total Rate	\$5.32710	\$4.71813	\$4.71813	\$4.10663	\$4.10663	4.10623	5.77463	4.10623	-22.9% 8.4%	-13.0%-22.4%	0.1%	\$0.00560		
Average Annual Usage (dk)	434.4	434.4	434.4	434.4	434.4	434.4	434.4	434.4						
Average Annual Cost of Gas	\$2,314.09	\$2,049.56	\$2,049.56	\$1,781.34	\$1,781.34	1,783.75	2,508.50	1,783.75	-22.9% 8.4%	-13.0%-22.4%	0.1%	\$2.43		
Customer Class														
Residential	\$0.0000	0.0%	0.0%	\$0.0056	\$0.0056	0.4%	0.4%	0.4%	\$0.0056	0.1%	\$0.44			
Firm General Service	0.0000	0.0%	0.0%	0.0056	0.0056	0.4%	0.4%	0.4%	0.0056	0.1%	\$2.43			

1/ Consolidated Base Cost of Gas effective July 1, 2017 in update to Docket No. G004/MR-16-834. Commodity margin effective May 1, 2019 in Docket No. E,G-999/CJ-17-895.

2/ Demand in Docket No. G004/M-19-430, effective November 1, 2019.

3/ Most recently filed PGA: October 2020.

4/ Includes seasonal capacity release of 2,000 Dk.

5/ GCR rate of \$0.0762 (effective September 1, 2018 - Docket No. G004/AA-18-374); GCR rate of (\$0.2344).

6/ Includes CCRC of \$0.0556 (effective January 1, 2017 - Docket No. G004/GR-15-879).

7/ CCRA of \$0.2125 (effective January 1, 2017 - Docket No. G004/M-16-384); CCRA rate of (\$0.0337) (effective August 1, 2019 - Docket No. G004/M-19-273).

8/ Effective with service rendered on and after June 1, 2017 - Docket No. G004/M-16-495.

9/ Effective with service rendered on and after March 1, 2019 - Docket No. G004/M-18-282 and October 1, 2020 - Docket No. G004/M-20-422.

10/ Effective with service rendered on and after April 1, 2019 - Docket No. G004/GR-15-879; April 1, 2020 - Docket No. G004/M-20-335.

GREAT PLAINS NATURAL GAS CO.
RATE EFFECT OF PROPOSED DEMAND - NOVEMBER 1, 2020
SOUTH DISTRICT
-UPDATE-

	Last Rate Case 1/	Last Demand Change 2/	July 2020 Rates 3/	November 2020 Proposed 4/	Last Rate Case	% Change from		Change from July 2020 Rates
						Last Demand Change	July 2020 Rates	
Residential								
Commodity Cost of Gas	\$2.53010	\$2.43770	\$1.70340	4.70340-3.02100	-32.7%-19.4%	-30.1%-23.9%	\$0.00000	
GCR 5/	0.16270	(0.23440)	(0.23440)	(0.23440) (0.06280)	-244.1% -138.6%	0.00% -73.2%	0.00000	
Demand Cost of Gas	1.18900	1.26730	4.45680	4.46240 1.46100	23.0% 22.9%	45.4% 15.3%	0.00560	
Commodity Margin 6/	1.65450	1.65450	4.65450	1.65450	0.0%	0.0%	0.00000	
CCRA 7/	0.21250	(0.03370)	(0.03370)	(0.03370)	-115.9%	0.0%	0.00000	
GAP 8/		0.01393	0.01393	0.01393	N/A	0.0%	0.00000	
GUIC 9/		0.24940	0.00000	0.00000 0.30410	N/A	-100.0% 21.9%	0.00000	
RDM 10/		(0.30500)	(0.20470)	(0.20470)	N/A	-32.9%	0.00000	
Total Rate	\$5.74880	\$5.04973	\$4.35553	4.36203 6.15333	-24.1% 7.0%	-13.6%-21.9%	\$0.00560	
Average Annual Usage (dk)	77.9	77.9	77.9	77.9				
Average Annual Cost of Gas	\$447.83	\$393.37	\$339.30	339.73-479.34	-24.1% 7.0%	-13.6%-21.9%	\$0.44	
Firm General Service								
Commodity Cost of Gas	\$2.53010	\$2.43770	\$1.70340	4.70340-3.02100	-32.7%-19.4%	-30.1%-23.9%	\$0.00000	
GCR 5/	0.16270	(0.23440)	(0.23440)	(0.23440) (0.06280)	-244.1% -138.6%	0.00% -73.2%	0.00000	
Demand Cost of Gas	1.18900	1.26730	4.45680	4.46240 1.46100	23.0% 22.9%	45.4% 15.3%	0.00560	
Commodity Margin 6/	1.31930	1.31930	4.31930	1.31930	0.0%	0.0%	0.00000	
CCRA 7/	0.21250	(0.03370)	(0.03370)	(0.03370)	-115.9%	0.0%	0.00000	
GAP 8/		0.01393	0.01393	0.01393	N/A	0.0%	0.00000	
GUIC 9/		0.17920	0.00000	0.00000 0.18030	N/A	-100.0% 0.6%	0.00000	
RDM 10/		(0.07420)	0.00000	0.00900	N/A	-112.1%	0.00000	
Total Rate	\$5.41360	\$4.87513	\$4.23403	4.23963 5.90803	-21.7% 9.1%	-13.0%-21.2%	\$0.00560	
Average Annual Usage (dk)	434.4	434.4	434.4	434.4				
Average Annual Cost of Gas	\$2,351.67	\$2,117.76	\$1,839.26	1,844.70-2,566.45	-21.7% 9.1%	-13.0%-21.2%	\$2.43	

Customer Class	Commodity Change		Demand Change		Total Change		Avg. Annual Bill Change
	(\$/dk)	(Percent)	(\$/dk)	(Percent)	(\$/dk)	(Percent)	
Residential	\$0.0000	0.0%	\$0.0056	0.4%	\$0.0056	0.1%	\$0.44
Firm General Service	0.0000	0.0%	0.0056	0.4%	0.0056	0.1%	\$2.43

- 1/ Consolidated Base Cost of Gas effective July 1, 2017 in update to Docket No. G004/MR-16-834. Commodity margin effective May 1, 2019 in Docket No. E,G-999/CI-17-895.
- 2/ Demand in Docket No. G004/M-19-430, effective November 1, 2019.
- 3/ Most recently filed PGA: October 2020.
- 4/ Includes seasonal capacity release of 2,000 Dk.
- 5/ GCR rate of \$0.0762 (effective September 1, 2018 - Docket No. G004/AA-18-374); GCR rate of (\$0.2344).
- 6/ Includes CCRC of \$0.0556 (effective January 1, 2017 - Docket No. G004/GR-15-879).
- 7/ CCRA of \$0.2125 (effective January 1, 2017 - Docket No. G004/M-16-384); CCRA rate of (\$0.0337) (effective August 1, 2019 - Docket No. G004/M-19-273).
- 8/ Effective with service rendered on and after June 1, 2017 - Docket No. G004/M-16-495.
- 9/ Effective with service rendered on and after March 1, 2019 - Docket No. G004/M-18-282 and October 1, 2020 - Docket No. G004/M-20-422.
- 10/ Effective with service rendered on and after April 1, 2019 - Docket No. G004/GR-15-879; April 1, 2020 - Docket No. G004/M-20-335.

**GREAT PLAINS NATURAL GAS CO.
DEMAND ENTITLEMENT ANALYSIS
-UPDATE-**

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)
2020-2021	24,425	109	0.45%	33,922	(144)	-0.42%	36,245	(700)	-1.89%	6.85%
2019-2020	24,316	76	0.31%	34,066	392	1.16%	36,945	1,400	3.94%	8.45%
2018-2019	24,240	243	1.01%	33,674	941	2.87%	35,545	1,100	3.19%	5.56%
2017-2018	23,997	184	0.77%	32,733	335	1.03%	34,445	200	0.58%	5.23%
Annual Average			0.64%			1.16%			1.46%	6.52%

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	(12) Change From Previous Year	(13) % Change From Previous Year				
2020-2021	28,451	(1,869)	-6.16%	-0.0954	1.3888	4.4839	1.5208
2019-2020	30,320	1,679	5.86%	0.1184	1.4010	1.5194	1.1701
2018-2019	28,641	112	0.39%	0.0772	1.3892	1.4664	1.2508
2017-2018				0.0713	1.3640	1.4354	1.1935
Annual Average			0.03%	0.0905	1.3858	4.4763	1.4855