



*A Division of Montana-Dakota Utilities Co.*

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December 30, 2024

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

**Re: Reply Comments to the Response Comments of the Minnesota Department of  
Commerce, Division of Energy Resources  
Docket No. G004/M-24-234**

Dear Mr. Seuffert:

Great Plains Natural Gas Co. (Great Plains, Company), a Division of Montana-Dakota Utilities Co., herewith electronically files its Reply Comments to the Response Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) filed on December 20, 2024 in the above referenced docket.

The Department recommends accepting Great Plains' proposed level of demand entitlement and allowing the Company to recover the associated demand costs through the monthly Purchased Gas Adjustment effective December 1, 2024 subject to the Department's reporting requirements for the Company's 2025-2026 Demand Entitlement filing.

Great Plains agrees with the Department's recommendation and will also comply with the Department's request below in the demand entitlement filings for the 2025-2026 heating season to provide:

- whether the Company can turn this VGT-FT-A 5,000 dk/day capacity back with no penalty, or whether it will incur penalties from Viking;
- whether the Company cannot rollover and not renew some of the expiring 2027 FT-A capacity; and,
- whether the Company can decrease its excess capacity.

Please contact me at (701) 222-7855 or [travis.jacobson@mdu.com](mailto:travis.jacobson@mdu.com), or Kristin Stastny at (612) 977-8656 with any questions regarding this filing.

Sincerely,

*/s/ Travis R. Jacobson*

Travis R. Jacobson  
Director of Regulatory Affairs

cc: Kristin Stastny