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Information Request No. 4

Docket No.: G-011/M-17-409
Response To: MPUC Data Requests
Requestor: Jason Bonnett (MPUC)
Date Received: May 20, 2021

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Please describe how Northern Natural Gas Company will address situations described in the Phase II Procedural Proposal in which MERC discontinues its services to a Minnesota farm tap customer under easement to NNG. We reference Northern Natural Gas Company’s statement in its September 14, 2017 Comments that there has always been a local utility serving as the retail provider. Was Northern Natural Gas Company, or its predecessor InterNorth, initially considered the retail provider for farm tap customers and was this service jurisdictional to the FERC or the MNPUC? How will that continue if MERC is allowed to discontinue its service as described in the Phase II Procedural Proposal?

Northern Natural Gas Response:

See the Northern 2017 Comments filed in this docket and the above response to PUC Request No. 3.

Prior to InterNorth’s sale of Peoples Natural Gas to UtiliCorp in 1985, Peoples provided the retail gas distribution service to farm tap customers. Although Peoples and Northern were affiliates, Northern owned the interstate pipeline, tap, and associated facilities. Northern delivered natural gas to the pipeline delivery point - the point of interconnection between Northern facilities and the facilities immediately downstream of the Northern-owned facilities. The utility (gas distribution company) or the enduser/farm tap customer owned all facilities downstream of the pipeline delivery point. The service provided upstream of the pipeline delivery point fell under FERC jurisdiction. Peoples provided the utility service downstream of the pipeline delivery point. Peoples Natural Gas was regulated by the Minnesota Public Utilities Commission.

Continuation of service downstream of Northern’s delivery point, is an issue subject to MPUC jurisdiction. Northern owns no facilities and provides no service downstream of Northern’s delivery point. As such, whether gas service is continued is a matter properly between the MPUC, MERC and the customers receiving service. Should the MPUC allow MERC to discontinue gas service, unless another provider of utility service replaces MERC, the farm tap customer would not receive natural gas distribution service. To the extent retail service is provided by MERC or another utility, Northern stands ready and able to provide the required interstate transportation service to the pipeline delivery point.

Preparer: Greg Porter
Title: Assistant General Counsel
Telephone: 402.398.7406
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