

August 8, 2019

**VIA ELECTRONIC FILING**

Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 East Seventh Place, Suite 350  
St. Paul, MN 55101

RE: Lake Region Energy Services, Inc.  
Petition for Small Gas Utility Franchise Exemption  
Docket No. G6977/M-17-186  
Petition Filing Date: March 6, 2017

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**COMMENTS OF LAKE REGION ENERGY SERVICES, INC.**

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**I. Background**

Lake Region Energy Services, Inc. (“LRES”) submitted a Petition for Exemption for Small Gas Utility on March 6, 2017 (the “Petition”). The Commission issued its Order dated July 28, 2017, granting the requests of LRES set forth in the Petition. The Commission subsequently set forth a uniform set of annual compliance filing requirements in its Order dated November 9, 2018. Due to a one-time filing issue, LRES submitted its 2019 Annual Compliance Report on May 6, 2019 rather than the May 1, 2019 intended filing date.

The Commission issued a Notice of Comment Period on July 5, 2019, requesting comment on the following issue:

Should the Minnesota Public Utilities Commission (Commission) accept the compliance filings submitted by Community Co-Ops of Lake Park, United Natural Gas, LLC, Lake Region Energy Services, Inc., Dooley’s Natural Gas, LLC, and Dooley’s Natural Gas II, LLC?

The Commission further identified two topics open for comment: (1) whether the small gas utilities have complied with the Commission’s November 9, 2018 Order; and (2) whether there are any other issues or concerns related to this matter.

## **II. LRES Comments**

LRES submits its comments only in relation to the May 6, 2019 compliance filing submitted by LRES in Docket G-6977/M-17-186.

In its May 6, 2019 Annual Compliance Report, LRES materially complied with the requirements established by the Commission in its November 9, 2018 Order. LRES therefore respectfully requests that the Commission accept its compliance filing. LRES believes that the requirements set forth in the Commission's November 9, 2018 Order are reasonable and appropriate and has no further comment on the compliance filing requirements.

LRES notes that in its 2019 Annual Compliance Report, it is indicated that LRES's rate book was last approved on February 21, 2019. To clarify, these proposed changes have not yet been implemented. LRES expects to meet with each municipality this fall. Any proposed rate book modifications will be implemented only after proper municipal input as defined by municipal ordinance, and will be compliant with Minn. Stat. § 216B.16, subd. 12(b) and with other applicable law. LRES has no further comments or topics to bring to the Commission's attention at this time.

Should any questions or concerns arise following the submission of these Comments, please do not hesitate to contact the undersigned.

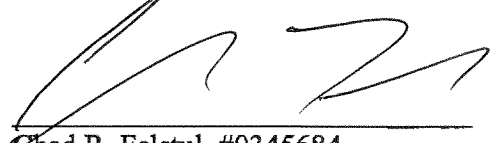
[Separate Signature Page Attached]

Dated: August 8, 2019



Tim Thompson, CEO  
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Respectfully submitted,



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