

December 20, 2024

Will Seuffert
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Response Comments of the Minnesota Department of Commerce
Docket No. G004/M-24-234

Dear Mr. Seuffert:

Attached are the comments of the Minnesota Department of Commerce (Department) in the following matter:

*In the Matter of Great Plains Natural Gas Company's Demand Entitlement Filing
(Petition).*

The Petition was filed by Great Plains Natural Gas Company (Great Plains, the Company) on June 28, 2024.

The Department recommends the Minnesota Public Utilities Commission (Commission):

- Accept the Company's proposed level of demand entitlement; and
- Allow Great Plains to recover associated demand costs through the monthly PGA effective December 1, 2024 subject to the following reporting requirements for the Company's 2025-2026 Demand Entitlement filing:
 - whether the company can turn this VGT-FT-A 5,000 dth/day capacity back with no penalty, or whether will it 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.

The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Peter Wyckoff, Ph.D.
Deputy Commissioner, Division of Energy Resources

JK/DT/ar
Attachment

Before the Minnesota Public Utilities Commission

Response Comments of the Minnesota Department of Commerce

Docket No. G004/M-24-234

I. INTRODUCTION

The Minnesota Department of Commerce, Division of Energy Resources (Department) provides its response to reply comments in Docket No. G004/M-24-234, the Demand Entitlement Filing (Petition) of Great Plains Natural Gas Company (Great Plains, or the Company).

II. PROCEDURAL BACKGROUND

- | | |
|------------------|---|
| June 28, 2024 | Great Plains filed a petition requesting changes in the overall levels of demand for natural gas pipeline capacity. ¹ |
| October 18, 2024 | The Department filed initial comments recommending the Commission: 1) Accept the Company's design day estimate for 2024-2025 heating season. 2) Approve Great Plains' proposal to release 8,291 dth via capacity release on Viking for the 2024-2025 heating season. 3) Require the Company in its 2025-2026 Demand Entitlement filing to provide specific information for the 5,000 dth/day contract Great Plains included as part of its capacity release efforts for the 2024-2025 heating season. The Department also asked for additional information on the Company's Firm General Service Rate Schedule 70. ² |
| October 31, 2024 | The Company filed an <i>Informational Update</i> (Update #1) which showed the demand entitlement volumes and costs that would be charged to ratepayers effective November 1, 2024. Great Plains stated in Update #1 that the WBI Wahpeton Project's (Project) in-service date had been delayed from November 1 to December 1, 2024 and the Company had been required to continue to include the Wahpeton load in its design day calculation and the corresponding demand entitlement calculation. ³ |

¹ *In the Matter of Great Plains Natural Gas Company's Demand Entitlement Filing*, Great Plains Natural Gas Company, Demand Entitlement Filing, June 28, 2024, Docket No. G004/M-24-234, (eDockets) [20246-208068-01](#), (hereinafter "Initial Filing").

² *In the Matter of Great Plains Natural Gas Company's Demand Entitlement Filing*, Minnesota Department of Commerce, Comments, October 18, 2024, (eDockets) [202410-211132-01](#), (hereinafter "DER Comments").

³ *In the Matter of Great Plains Natural Gas Company's Demand Entitlement Filing*, Great Plains Natural Gas Company, Informational Update, October 31, 2024, (eDockets) [202410-211495-01](#), (hereinafter Update #1).

November 6, 2024 Great Plains filed its *Reply Comments* agreeing with the Department’s assessment that the Company’s design-day is acceptable and agreeing with the Department’s recommendations.⁴

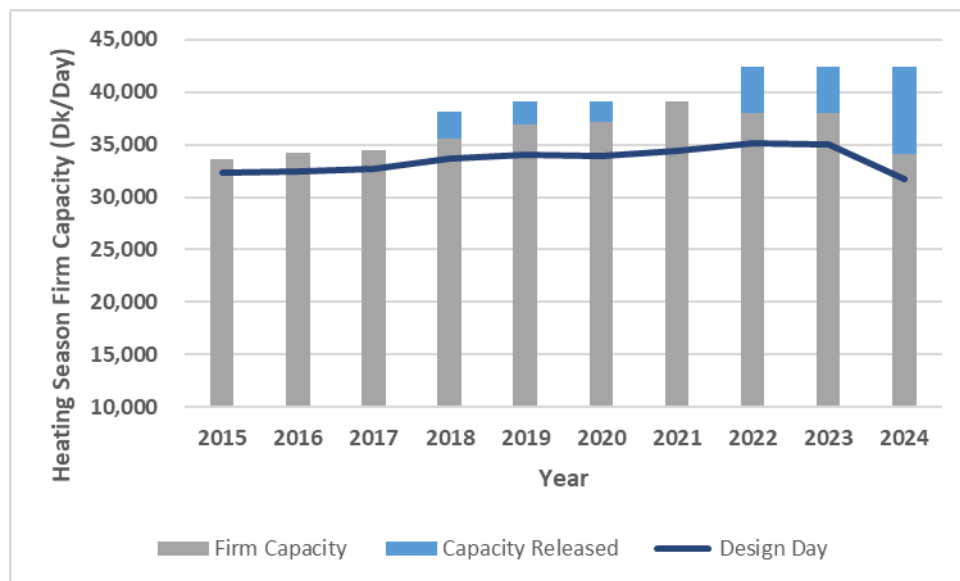
November 27, 2024 Great Plains filed an *Additional Informational Update Filing* (Update #2) in which the Company stated that the Project’s in-service date was December 1, 2024. Great Plains also provided updated supply and demand information and costs that would be effective December 1, 2024.⁵

III. DEPARTMENT ANALYSIS

A. PROPOSED OVERALL DEMAND ENTITLEMENT LEVEL

In its initial comments, the Department included Chart 1, illustrating Great Plains’ heating season forecasted demand (design-day estimate) and its approved proposed supply (demand entitlements). The Department again provides Chart 1 as a starting point for the discussion of additional information Great Plains provided in the three filings it has made since the Department filed its comments.

Chart 1: Heating Season Firm Capacity, Capacity Release, and Design-Day 2015-2016 through 2024-2025



DER Comments at 10.

⁴ *In the Matter of Great Plains Natural Gas Company’s Demand Entitlement Filing*, Great Plains Natural Gas Company, Reply Comments, November 6, 2024, (eDockets) [202411-211674-01](#), (hereinafter “Reply Comments”).

⁵ *In the Matter of Great Plains Natural Gas Company’s Demand Entitlement Filing*, Great Plains Natural Gas Company, Additional Informational Update Filing, November 27, 2024, (eDockets) [202411-212513-01](#) (hereinafter “Update #2”).

The Department also stated in its comments.

As noted in Table 1, Great Plain's design day estimate for the 2024-2025 heating season is 31,678 dth/day. That design day estimate is lower than every annual design day estimate since the 2015 – 2016 heating season. The transfer of the Wahpeton load from Great Plains to Montana-Dakota Utilities represents a significant decrease in Great Plains' design day. Described in economic terms, Great Plains' maximum demand decreased by 9.4% in one year. [Emphasis added.]⁶

This permanent decrease in the Company's design-day informed the Department's review of the filing.

A.1. Informational Update filed October 31, 2024

Update #1 discussed three topics: the delay to the Wahpeton Project in-service date, the adjustments to supply and demand necessary to compensate for this delay, and the effect on rates.

A.1.1. Wahpeton Project Delayed In-Service Date and Accompanying Adjustments

Great Plains noted in its October 31, 2024 update that weather-related delays changed the in-service date for the Project from November 1 to December 1, 2024.⁷ The Company had assumed throughout the filing process that the Project would meet the November 1 deadline and had removed the Wahpeton-related load from its calculations for both the demand and supply components of this filing for the month of November 2024. On the demand side, Great Plains stated that the addition of the Wahpeton firm load of 3,300 dth/day would contribute to the Company's demand costs until the Project-related load was transferred to Montana-Dakota's integrated gas system.⁸

This additional demand required Great Plains to adjust its demand entitlement. The Company modified its proposal such that it will now execute monthly variable capacity releases on Viking Gas Transmission Pipeline (Viking, VGT) rather than offering 8,291 dth/day of firm capacity release on Viking for the entire heating season. This change will allow the Company to provide service to Wahpeton on a month-by-month basis until the Project is in-service. Great Plains noted in Update #1 that it had released 9,000 dth/day of firm capacity for the month of November 2024 at the rate of \$15.30 Dth/day.⁹ Chart 2 summarizes the Company's design day, heating season firm capacity and proposed capacity release for November 2024.

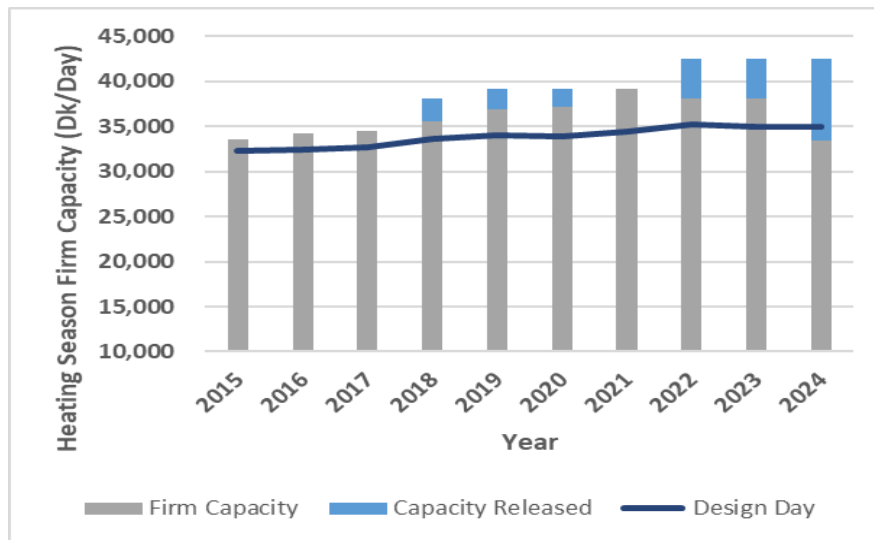
⁶ DER Comments at 10.

⁷ Update #1 at 2.

⁸ *Id.*

⁹ *Id.*

Chart 2: Heating Season Firm Capacity, Capacity Release, and Design-Day 2015-2016 through November 2024



The proposed changes for November 2024 summarized in Chart 2 increase the Company’s demand and decreased the amount of excess firm capacity it holds. While this strategy may not be feasible for an entire heating season, it is not unreasonable given an unseasonably warm fall and only a one-month contract period.

A.1.2. Northern Natural Gas (NNG) TF Base and TF Variable Allocation

The Company also noted NNG provided information to Great Plains regarding the Company’s final allocation of TF Base and TF Variable entitlements.¹⁰ The TF12 Base allocation increased 574 Dth to 5,703 dth/day and the TF12 Variable allocation decreased by the corresponding amount to 5,242 dth/day. The impact of the changes to the TF12 allocations on the Company’s annual demand cost was a decrease of \$0.1396/Dth.

Great Plains also provided updated exhibits reflecting the proposed changes in Update #1. That information identified a decrease of a residential customer’s annual demand costs of 6.7 percent compared to the Company’s rates effective September 1, 2024.¹¹ Compared to its Initial Filing, residential customer annual demand costs are 22.5 percent lower.¹²

¹⁰ *Id.*

¹¹ Update #1 at 3.

¹² Initial Filing Exhibit C, demand cost of \$2.5222/Dth applied to the average residential customer demand of 81.2 Dth equals \$204.80. Update #1 at 3, annual residential demand cost \$158.74. $\$158.74 - \$204.80 = -\$46.06$. $-\$46.06 / \$204.80 = -22.5\%$.

A.2. Reply Comments

Great Plains provided in reply comments the additional information requested by the Department regarding its Firm General Service Rate Schedule 70.¹³ The Company also agreed to provide the information the Department requested on the 5,000 Dth/day contract that was included as part of Great Plains's capacity release efforts for the 2024-2025 heating season.¹⁴

Great Plains also noted that it would provide information on the various recommendations included in the Department's response to reply and supplemental comments for two prior Great Plains contract demand entitlement filings in Docket Nos. G004/M-22-130 and G004/M-23-262.¹⁵

A.3. Informational Update filed November 27, 2024

Update #2 included two topics—a status report on the Project and updated demand costs for the balance of the gas year.

A.3.1. Wahpeton Project In-Service Date

Great Plains noted the Project's in-service date of December 1, 2024 and that it had released excess capacity of 7,000 Dth/day in Viking for December 2024 at an average rate of \$30.32, resulting in a credit of \$212,240 for that month.¹⁶ The Company also noted that it would continue to release excess capacity monthly for the remainder of the heating season.¹⁷ Chart 3, below, summarizes those proposed changes to the Company design-day, December 2024 through March 2025 firm capacity, and capacity release.

Demand decreased 3,300 Dth/day due to the removal of the Wahpeton load. Supply remained constant, but the amount of excess capacity offered via the capacity release program in December decreased to 7,000 Dth as compared to 9,000 Dth in November. The December 2024 supply/demand balance returned to the standard relationship where the amount of firm supply is greater than the design day.

¹³ Reply Comments at 1.

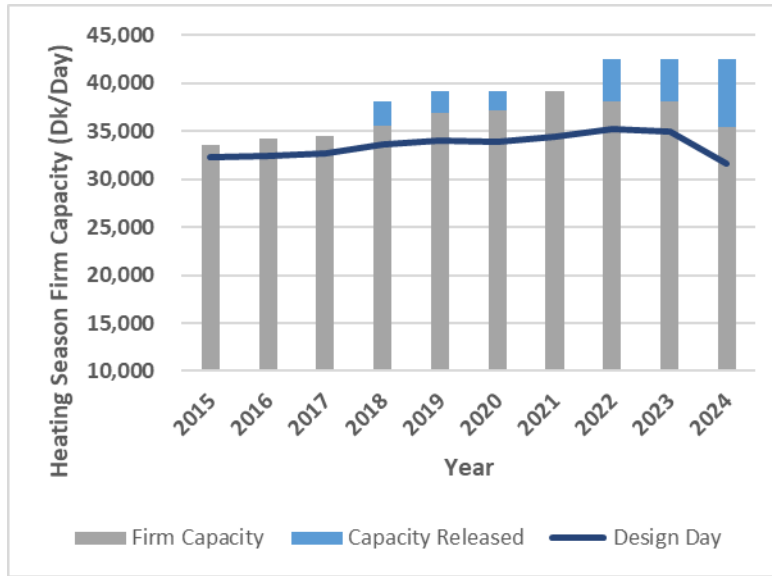
¹⁴ *Id.* That information includes: 1) whether Great Plains can turn this VGT-FT-A 5,000 dth/day of capacity back with no penalty, or whether it will incur penalties from Viking; 2) whether the Company cannot rollover and not renew some of the expiring 2027 FT-A capacity; and 3) whether Great Plains can decrease its excess capacity.

¹⁵ Reply Comments at 2.

¹⁶ Update #2 at 3.

¹⁷ Update #2 at 1.

Chart 3: Heating Season Firm Capacity, Capacity Release, and Design-Day 2015-2016 through December 2024



The Department provides revised summary tables for Great Plains’ proposed entitlements and reserve margins, corresponding to Table 2 and Table 4 from the Department’s initial comments. The Department has also updated Attachments 1 and 2 from its Initial Comments based on the information provided by the Company in Update #2. The updated Attachments 1 and 2 are submitted with these response comments.

Department Table 1, below, provides an updated comparison of the Company’s current and proposed overall level of entitlements. The Company’s overall level of entitlements decrease by 2,709 Dth/day, corresponding to the increased capacity release from 4,291 Dth/day to 7,000 Dth/day.¹⁸

Table 1: A Comparison of Great Plains’ Current and Proposed Entitlements

Pipeline	Current Entitlement (Dth/day)	Proposed Entitlement (Dth/day)	Change (Dth/day)	Percent Change
VGT	19,000	16,291	(2,709)	-14.26%
NNG	19,145	19,145	0	0.00%
Total	38,145	35,436	(2,709)	-7.10%

Update #2 Exhibit B.

¹⁸ Update #2 Exhibit B at 1.

The Department provides Table 2, below, with the updated reserve margin through the 2024-2025 heating season.

Table 2: Great Plains' Reserve Margin 2019 through 2025 (Percent)

Heating Season	Design Day (Dth/day) (a)	Total Entitlement (Dth/day) (b)	Reserve Margin (c) = (b-a)/a
2019-2020	34,066	36,945	8.45%
2020-2021	33,922	37,145	9.50%
2021-2022	34,398	39,145	13.80%
2022-2023	35,159	38,145	8.49%
2023-2024	34,975	38,145	9.03%
2024-2025	31,678	35,436	11.86%

Update #2 Exhibit D.

While on the high end of its historical norms, the proposed reserve margin of 11.86 percent remains within the bounds in which Great Plains has operated since the 2006-2007 heating season.¹⁹ The Department concludes the Company likely has sufficient capacity to ensure firm reliability on a peak day. As discussed above, the Department has requested the Company provide additional information in its 2025-2026 demand entitlement filing to ensure that its supply and demand are reasonably balanced.

A.3.2. Updated Demand Costs

Great Plains' updated demand change represents an increase of \$0.2840/Dth from rates effective November 1, 2024, which is an increase of 14.50 percent in a Residential customer's annual demand cost.²⁰ This somewhat large percentage increase is the result of the removal of the Wahpeton load in the calculation of the rates effective December 1st. However, the updated rates reflect lower annual demand costs than those proposed in the Initial Filing. In its Initial Filing, Great Plains anticipated annual demand costs for an average residential customer of \$204.80,²¹ while in Update #2 the annual demand costs are \$181.80,²² reflecting a decrease of \$23.00 or 11.2 percent.

The Company also increased its estimate value of the capacity release credit from \$232,977 in the Initial Filing²³ to \$1,061,200²⁴ in Update #2. In its Initial Filing, Great Plains assumed the capacity release would receive the tariffed rate. The favorable market rates received for the capacity release drove the increased credit, equaling an increase in the credit of \$828,233 or 355 percent.

¹⁹ See updated Department Attachment 2.

²⁰ Update #2 at 4.

²¹ Initial Filing Exhibit C, demand cost of \$2.5222/Dth applied to the average residential customer demand of 81.2 Dth equals \$204.80.

²² Update #2 at 4.

²³ Initial Filing at 4.

²⁴ Update #2 at 3.

Great Plains estimated its November 1, 2024 demand rate as \$2.52220 in its Initial Filing.²⁵ The Company proposes a December 1, 2024 demand rate of \$2.23890 in Update #2.²⁶ After removing the effects of the changes in demand and supply as well as the addition of more timely information on the capacity release market, the Department concludes that the proposed December 1, 2024 demand rate is reasonable and recommends approval.

The Department noted in its comments that it would reserve judgement on the wisdom of Great Plains ratepayers incurring the cost of maintaining the additional 8,291 Dth of firm capacity on Viking the Company was proposing to release for the winter heating season.²⁷ The Company's current estimate of the market value of that capacity is \$30.32/Dth while the cost of that capacity to Great Plains' ratepayers is \$5.62/Dth, which is VGT's tariffed rate. The Department recognizes that the Company's forecast of the market value for firm heating season capacity on Viking was correct and Great Plains ratepayers benefited in November and December 2024 financially from that strategy. Hence, the Department will not pursue this issue further in this docket.

IV. DEPARTMENT RECOMMENDATIONS

Based on its review and analysis of the information in the record, the Department has prepared recommendations, which are provided below.

- Accept the Company's proposed level of demand entitlement; and
- Allow Great Plains to recover associated demand costs through the monthly PGA effective December 1, 2024 subject to the following reporting requirements for the Company's 2025-2026 Demand Entitlement filing:
 - whether the company can turn this VGT-FT-A 5,000 dth/day capacity back with no penalty, or whether will it 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.

²⁵ Initial Filing, Exhibit C at 1.

²⁶ Update #2, Exhibit C at 1.

²⁷ DER Comments at 18.

Attachments

Response Comments Department Attachment 1
Docket No. G004/M-24-234
Great Plains Demand Entitlement Historical and Current Proposal

Contract Type	2015-2016 Quantity (Mcf)	2016-2017 Quantity (Mcf)	2017-2018 Quantity (Mcf)	2018-2019 Quantity (Mcf)	2019-2020 Quantity (Mcf)	2020-2021 Quantity (Mcf)	2021-2022 Quantity (Mcf)	2022-2023 Quantity (Mcf)	2023-2024 Quantity (Mcf)	Proposed As of 11/27/24			
										2024-2025 Quantity (Mcf)	Change in Quantity (Mcf)	Change in Capacity (%)	Change in Design Day (%)
VGT													
FT-A (12-month)	13,000	13,000	13,000	18,000	18,000	18,000	18,000	21,291	21,291	21,291	-		
FT-A (5-month)	2,700	3,400	2,000	2,000	2,000	2,000	2,000	2,000	2,000	2,000	-		
BP (5-month)	-	-	1,600	-	-	-	-	-	-	-	-		
Seasonal Capacity Release				(2,600)	(2,200)	(2,000)	-	(4,291)	(4,291)	(7,000)	(2,709)		
Total VGT	15,700	16,400	16,600	17,400	17,800	18,000	20,000	19,000	19,000	16,291	(2,709)		
NNG													
TFX (12-month)*	2,000	2,000	700	1,000	2,000	2,000	3,000	3,000	3,000	3,000	-		
TFX (5-month)	6,200	6,200	6,200	6,200	6,200	6,200	5,200	5,200	5,200	5,200	-		
TF12B	4,604	5,421	4,854	3,819	3,921	4,036	3,653	4,128	3,531	5,703	2,172		
TF12V	2,931	2,114	2,681	3,716	3,614	3,499	3,882	3,407	4,004	5,242	1,238		
TF5	3,410	3,410	3,410	3,410	3,410	3,410	3,410	3,410	3,410	-	(3,410)		
TFX (Capacity Release)	(1,300)	(1,300)	-	-	-	-	-	-	-	-	-		
Total NNG	17,845	17,845	17,845	18,145	19,145	19,145	19,145	19,145	19,145	19,145	-		
Total Entitlement	33,545	34,245	34,445	35,545	36,945	37,145	39,145	38,145	38,145	35,436	(2,709)	-7.10%	-9.43%
Total Annual Transportation	22,535	22,535	21,235	26,535	27,535	27,535	28,535	31,826	31,826	35,236	3,410	10.71%	
Total Winter Only Transport	11,010	11,710	13,210	9,010	9,410	9,610	10,610	6,319	6,319	200	(6,119)	-96.83%	
Percent of Winter Only Capacity	32.82%	34.19%	38.35%	25.35%	25.47%	25.87%	27.10%	16.57%	16.57%	0.56%			

Source: Great Plains Exhibit B

Response Comments Department Attachment 2
Docket No. G004/M-24-234
Great Plains Demand Entitlement Analysis*

	Number of Firm Customers			Design-Day Requirement			Total Entitlement Plus Peak Shaving			Reserve Margin	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
Heating Season	Number of Customers	Change from Previous Year	% Change From Previous Year	Design Day (Dth)	Change from Previous Year	% Change From Previous Year	Total Design-Day Capacity (Dth)	Change from Previous Year	% Change From Previous Year	Reserve (7) - (4)	% Reserve $[(7)-(4)]/(4)$
2024-2025	22,330	(2,375)	-9.61%	31,678	(3,297)	-9.43%	35,436	(2,709)	-7.10%	3,758	11.86%
2023-2024	24,705	(85)	-0.34%	34,975	(184)	-0.52%	38,145	0	0.00%	3,170	9.06%
2022-2023	24,790	72	0.29%	35,159	760	2.21%	38,145	(1,000)	-2.55%	2,986	8.49%
2021-2022	24,718	293	1.20%	34,399	477	1.41%	39,145	2,000	5.38%	4,746	13.80%
2020-2021	24,425	109	0.45%	33,922	(144)	-0.42%	37,145	200	0.54%	3,223	9.50%
2019-2020	24,316	76	0.31%	34,066	392	1.16%	36,945	1,400	3.94%	2,879	8.45%
2018-2019	24,240	243	1.01%	33,674	941	2.87%	35,545	1,100	3.19%	1,871	5.56%
2017-2018	23,997	184	0.77%	32,733	335	1.03%	34,445	200	0.58%	1,712	5.23%
2016-2017	23,813	(69)	-0.29%	32,398	131	0.41%	34,245	700	2.09%	1,847	5.70%
2015-2016	23,882	358	1.52%	32,267	1,143	3.67%	33,545	900	2.76%	1,278	3.96%
2014-2015	23,524	296	1.27%	31,124	1,691	5.75%	32,645	2,000	6.53%	1,521	4.89%
2013-2014	23,228	290	1.26%	29,433	339	1.17%	30,645	0	0.00%	1,212	4.12%
2012-2013	22,938	164	0.72%	29,094	158	0.55%	30,645	159	0.52%	1,551	5.33%
2011-2012	22,774	40	0.18%	28,936	(393)	-1.34%	30,486	(1,380)	-4.33%	1,550	5.36%
2010-2011	22,734	(2)	-0.01%	29,329	(515)	-1.73%	31,866	(1,170)	-3.54%	2,537	8.65%
2009-2010	22,736	85	0.38%	29,844	119	0.40%	33,036	(1,170)	-3.42%	3,192	10.70%
2008-2009	22,651	49	0.22%	29,725	(714)	-2.35%	34,206	0	0.00%	4,481	15.07%
2007-2008	22,602	1	0.00%	30,439	(406)	-1.32%	34,206	0	0.00%	3,767	12.38%
2006-2007	22,601			30,845			34,206			3,361	10.90%
Average			-0.04%			0.20%			0.25%		8.37%

	Firm Peak-Day Sendout			Per Customer Metrics			
	(12)	(13)	(14)	(15)	(16)	(17)	(18)
Heating Season	Firm Peak-Day Sendout (Dth)	Change from Previous Year	% Change From Previous Year	Excess per Customer $[(7) - (4)]/(1)$	Design Day per Customer (4)/(1)	Entitlement per Customer (7)/(1)	Peak-Day Send per Customer (12)/(1)
2024-2025	unknown			0.1683	1.4186	1.5869	unknown
2023-2024	30,083	(603)	-1.97%	0.1283	1.4157	1.5440	1.2177
2022-2023	30,686	808	2.70%	0.1205	1.4183	1.5387	1.2378
2021-2022	29,878	(1,367)	-4.38%	0.1920	1.3917	1.5837	1.2088
2020-2021	31,245	2,794	9.82%	0.1320	1.3888	1.5208	1.2792
2019-2020	28,451	(1,869)	-6.16%	0.1184	1.4010	1.5194	1.1701
2018-2019	30,320	1,679	5.86%	0.0772	1.3892	1.4664	1.2508
2017-2018	28,641	112	0.39%	0.0713	1.3640	1.4354	1.1935
2016-2017	28,529	1,283	4.71%	0.0776	1.3605	1.4381	1.1980
2015-2016	27,246	(1,853)	-6.37%	0.0535	1.3511	1.4046	1.1409
2014-2015	29,099	1,406	5.08%	0.0647	1.3231	1.3877	1.2370
2013-2014	27,693	3,471	14.33%	0.0522	1.2671	1.3193	1.1922
2012-2013	24,222	5,513	29.47%	0.0676	1.2684	1.3360	1.0560
2011-2012	18,709	(4,269)	-18.58%	0.0681	1.2706	1.3386	0.8215
2010-2011	22,978	1,442	6.70%	0.1116	1.2901	1.4017	1.0107
2009-2010	21,536	(1,731)	-7.44%	0.1404	1.3126	1.4530	0.9472
2008-2009	23,267	540	2.38%	0.1978	1.3123	1.5101	1.0272
2007-2008	22,727	852	3.89%	0.1667	1.3467	1.5134	1.0055
2006-2007	21,875			0.1487	1.3648	1.5135	0.9679
Average			2.38%	0.1135	1.3502	1.4638	1.1201

*The Petition is the eighth in which the Company's South District and North District were combined based on the ruling in Docket No. G004/GR-15-879. The Department combined the districts for comparison.

CERTIFICATE OF SERVICE

I, Nicole Westling, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce

Comments

Docket No. G004/M-24-234

Dated this **20th** day of **December 2024**

/s/Nicole Westling

First #	Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	24-234M-24-234
2	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	24-234M-24-234
3	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		Yes	24-234M-24-234
4	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	24-234M-24-234
5	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	24-234M-24-234
6	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	24-234M-24-234