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August 25, 2025

Mr. Mike Bull  
Acting Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
Saint Paul, MN 55101

**Re:** Comments of the Minnesota Blue Flame Gas Association  
Docket No. G-999/CI-21-565 – Evaluation of Minnesota’s Natural Gas Regulatory Framework

Dear Mr. Bull:

On behalf of the Minnesota Blue Flame Gas Association (MBFGA), we appreciate the opportunity to comment on the above-referenced docket. Our association represents a broad coalition of natural gas utilities, suppliers, and stakeholders committed to ensuring Minnesotans have access to safe, affordable, and reliable energy.

We respectfully submit our concerns regarding proposals to eliminate Minnesota’s natural gas line extension allowances.

### **Minnesota’s Cold Climate Requires Reliable Heating**

Minnesota winters are among the harshest in the nation, with long periods of extreme cold. Natural gas provides dependable and immediate heating capacity when it is needed most. While we recognize the state’s decarbonization goals, we believe it is imperative that regulatory policies acknowledge the unique realities of Minnesota’s climate. Any reduction in access to reliable heating sources would put households and businesses at risk during critical winter months.

### **Importance of Customer Choice and Fuel-Neutral Policies**

We support energy policies that are fuel-neutral and that preserve customer choice. Minnesotans should be able to decide which heating source best serves their families, businesses, and budgets. Eliminating line extension allowances would effectively limit this choice, particularly for new homeowners, small businesses, and communities seeking growth opportunities. A balanced energy framework that allows multiple technologies to compete fairly will provide better long-term outcomes for consumers and the state.

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## Equity and Affordability Considerations

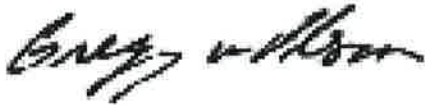
Line extension allowances are a long-standing mechanism to ensure equitable access to utility service. Removing these allowances would shift significant upfront costs to new customers, creating barriers to access for households and small businesses, especially in rural and growing communities. The first alternative for most homeowners facing more expensive natural gas connection costs will be propane. Maintaining the current policy helps ensure that the benefits of utility service are broadly shared, without creating affordability challenges for those seeking service connections.

## Recommendation

For these reasons, MBFGA urges the Commission to **retain the current natural gas line extension allowance policy**. This approach maintains affordability and equity, supports customer choice, and ensures Minnesotans continue to have reliable heating options that are essential in our cold climate.

We thank the Commission for its thoughtful evaluation of these important issues and respectfully request that any reforms to Minnesota's natural gas regulatory framework carefully preserve the reliability, affordability, and choice that Minnesotans depend upon.

Respectfully submitted,



Greg Olson  
President  
MN Blue Flame Gas Association