

December 18, 2024

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

RE: Comments of the Minnesota Department of Commerce
Docket No. G022/M-24-236

Dear Mr. Seuffert:

On December 9, 2024 Greater Minnesota Gas (GMG) filed a letter in the current proceeding, which indicates that the Company will withdraw its request to approve the Natural Gas Supply Agreement if the Commission chooses Decision Option 7, which would remove the \$8/Dth price cap.

While the Minnesota Department of Commerce (Department) does not change its position about statutory compliance with Minn. Stat. § 216B.2427, subd. 4, the Department presents three new decision options that are statutorily compliant:

7A: GMG may modify its Tariff, Interconnection Agreement, and Natural Gas Supply Agreement, as necessary, to require that the Company curtail NG supply when the average Ventura and Demarc daily index price is above \$8.42/Dth.

7B: GMG may modify its Tariff, Interconnection Agreement, and Natural Gas Supply Agreement, as necessary, to require that all NG be transported by the Company when the average Ventura and Demarc daily index price is above \$8.42/Dth.

7C: GMG may purchase NG at an average Ventura and Demarc daily index price above \$8.42/Dth, with the understanding that the Company is not entitled to cost recovery for these transactions.

Sincerely,

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

CERTIFICATE OF SERVICE

I, Marcella Emeott, hereby certify that I have this day served copies of the following document on the attached list of persons by electronic filing, 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. G022/M-24-236

Dated this **18th** day of **December 2024**

/s/Marcella Emeott

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	24-236M-24-236
2	Robin	Burke	rburke@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	24-236M-24-236
3	Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	24-236M-24-236
4	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	24-236M-24-236
5	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	24-236M-24-236
6	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	24-236M-24-236
7	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	24-236M-24-236
8	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	24-236M-24-236
9	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	24-236M-24-236