



July 31, 2025

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VIA EFILING

Mr. Mike Bull
Interim Executive Secretary
Minnesota Public Utilities Commission
350 Metro Square Building
121 Seventh Place East
St. Paul, MN 55101

Re: *In the Matter of the Application of Greater Minnesota Gas, Inc. for Authority to Increase Rates for Natural Gas Utility Service in Minnesota*
MPUC Docket No. G-022/GR-24-350

Dear Mr. Bull:

Greater Minnesota Gas, Inc. (GMG or Company) appreciates the thorough and reasoned analysis contained in Administrative Law Judge (ALJ) Jessica Palmer-Denig's Summary of Public Testimony, Findings of Fact, Conclusions of Law and Recommendation issued July 11, 2025 in the above-referenced docket (ALJ Report).¹ GMG supports ALJ Palmer-Denig's factual findings and legal conclusions, which are consistent with the law and the record. Due to the comprehensive analysis in the ALJ Report, GMG has no exceptions but respectfully submits this filing pursuant to the Minnesota Public Utilities Commission's (Commission) Notice of Schedule for Filing Exceptions to the ALJ Report² with respect to the Department's recommended adjustments to GMG's class cost of service study (CCOSS) in future rate cases, on which the ALJ offered no specific recommendation.

The ALJ appropriately determined that GMG demonstrated the reasonableness of its revised CCOSS that the Company provided in rebuttal testimony.³ While the ALJ did not make any recommendation as to whether the Commission should adopt the Department's proposed future CCOSS recommendations, she accurately determined, based on the record, that the proposed recommendations would likely require that GMG hire an outside CCOSS expert or consultant, add additional personnel, and pay for licenses for CCOSS modeling software.⁴ The ALJ correctly

¹ SUMMARY OF PUBLIC TESTIMONY, FINDINGS OF FACT, CONCLUSIONS OF LAW AND RECOMMENDATION (July 11, 2025) (eDocket No. 20257-220864-01) (hereinafter ALJ Report).

² Notice of Schedule for Filing Exceptions to the ALJ Report (July 14, 2025) (eDocket No. 20257-220918-01).

³ ALJ Report at ¶ 324.

⁴ See *Id.* at ¶ 323.

found that implementing the proposed recommendations would require significant resources and expenses that would ultimately be borne by GMG's ratepayers.⁵

Indeed, even assuming that GMG could retain a CCOSS consultant, or obtain the necessary modeling software, and/or hire and train a new employee capable of making the proposed changes to the Company's CCOSS for a very conservative estimate of \$50,000, that would result in a significant per customer cost of approximately \$4.50, based on GMG's current customer count.⁶ Such an expenditure for GMG would be the equivalent of CenterPoint Energy Minnesota Gas spending approximately \$4.1 million on CCOSS studies – an amount that would no doubt be deemed an imprudent use of customer resources.⁷

GMG thanks Judge Palmer-Denig for her work in this proceeding and agrees with her findings and conclusions. Therefore, the Company recommends that the Commission adopt the ALJ Report in its entirety, and continues to request that the Commission reject the Department's proposed recommended adjustments to GMG's CCOSS in future rate cases. In addition, given the confusion in this record regarding GMG's compliance with prior Commission rate case orders, despite the Commission's finding that the current filing was complete, GMG also respectfully requests that the Commission's final order in this case supersede any prior rate case orders and clearly articulate any filing requirements for the Company's next rate case.

If you have any questions regarding this matter, please feel free to contact me at eswanson@winthrop.com. This document has been filed in the eDocket system and served on the attached service list. Also enclosed is our affidavit of service.

Very truly yours,

WINTHROP & WEINSTINE, P.A.

/s/ Eric F. Swanson

Eric F. Swanson

Enclosures

Cc: Service List

40066718v2

⁵ *Id.*

⁶ \$50,000/11,172 customers = \$4.48/customer.

⁷ CenterPoint Energy Minnesota Gas serves over 920,000 Minnesota customers. \$4.48 x 920,000 = \$4,121,600. *See In the Matter of the Petition by CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G-008/GR-23-173, Letter of CenterPoint Energy Minnesota Gas (Feb. 28, 2025).

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION
121 Seventh Place East, Suite 350
St. Paul, Minnesota 55101-2147

In the Matter of the Application of Greater
Minnesota Gas, Inc. for Authority to Increase
Rates for Natural Gas Utility Service in
Minnesota

OAH Docket No. 71-2500-40492
MPUC Docket No. G-022/GR-24-350

AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)
) ss.
COUNTY OF WASHINGTON)

Mary G. Holly, of the City of Lake Elmo, County of Washington, the State of Minnesota,
being first duly sworn, deposes and says that on the 31st day of July, 2025, she served the
attached **Exceptions** to all said persons on the attached Service List, true and correct copies
thereof, by eFiling.

/s/ Mary G. Holly
MARY G. HOLLY

Subscribed and sworn to before me this
31st day of July, 2025.

/s/ Rachel M. Tillemans
Notary Public

My Commission Expires: January 31, 2027

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
11	Amrit	Hundal	amrit.hundal@ag.state.mn.us		Office of the Attorney General - Department of Commerce		Electronic Service		No	24-350Official CC Service List
12	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	24-350Official CC Service List
13	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	24-350Official CC Service List
14	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		Yes	24-350Official CC Service List
15	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		No	24-350Official CC Service List
16	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	24-350Official CC Service List
17	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	24-350Official CC Service List