

July 8, 2015

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G004/M-15-566

Dear Mr. Wolf:

Attached are the Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Petition of Great Plains Natural Gas Co. for Approval of a New Consumer
Billing Statement Form

The Petition was filed on September 2, 2014 by:

Tamie A. Aberle
Director of Regulatory Affairs
Great Plains Natural Gas Co.
P.O. Box 176
Fergus Falls, MN 56538-0176
(218) 736-6935

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve** the Petition.

The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ LAURA B. OTIS
Rates Analyst
651-539-1828

LBO/lt
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET No. G004/M-15-566

I. BACKGROUND

Great Plains Natural Gas Co. (Great Plains or the Company) recently revamped its consumer billing statement in conjunction with the conversion to a new customer billing system that occurred in February 2015. The new consumer billing statement form was approved by the Commission on December 1, 2014 in Docket No. G004/M-14-782.

II. SUMMARY OF GREAT PLAINS' REQUEST

On June 8, 2015 Great Plains submitted a petition (Petition) to the Minnesota Public Utilities Commission (Commission) for approval to modify its consumer billing statement contained in its Natural Gas Tariff. Specifically, Great Plains requested that the Commission approve the following changes:

- Addition of information for the Online payment option on the back side of the billing statement;
- Revised language regarding past due dates; and
- Addition of the town name, state, and zip code of the address where customer inquiries or complaints may be sent.

III. DEPARTMENT'S ANALYSIS OF GREAT PLAINS' REQUEST

Petitions for changes to the tariff pages related to the standard customer bill form are governed by Minnesota Rules 7829.1300, 7820.0200 and 7820.3500. Great Plains states in the Petition that it will continue to meet the requirements under Minnesota Rules with the billing form revised as requested.

Minnesota Rules 7829.1300

MN Rules 7829.1300 sets out the rule requirements for miscellaneous tariff and price list filings, such as the Petition. The Department has reviewed the Petition and found that Great Plains complied with the requirements laid out in the rule.

Minnesota Rules 7820.0200

This rule describes the information that a utility is responsible for providing to its customers. The subpart of this rule that pertains to the customer billing form is subpart C.1, which requires that the utility include the following on its billing statement:

“Register any inquiry or complaint at ...” (and list the address and telephone number of the utility, designating where the customer may initiate an inquiry or a complaint, or a concise statement as to where such information can be obtained).

The Company’s request will adjust this part of the billing form by adding the city, state, and zip code to the address that is currently provided as part of the above statement. The Department recommends that this change be approved, as it enhances the customers’ ability to effectively communicate with the Company and is in compliance with the rule cited.

Minnesota Rules 7820.3500

MN Rules 7820.3500 governs utility billing content by setting out a list of information that must be provided in customer billing statements. Great Plains does not intend to change any of the information required under the rule criteria.

Other Changes

Great Plains has requested that it be allowed to change the language on the back of its billing form regarding customer due dates. This change will remove language specific to the number of days within which a customer’s bill is due and replace it with language stating that the customer's bill is past due if not paid by the due date shown on the front of the billing statement. The Department supports this request.

Finally, Great Plains has requested that it be allowed to add information regarding its new online bill pay option. The Company expects to have this service available in September 2015. This change will alert customers to this new option and provide instructions on how to access the new service. The Department supports Great Plains’ request to add this information to the customer bill form.

The Department notes that, to the extent Great Plains’ online bill pay option involves customer agreements, Great Plains may be required to obtain Commission approval before implementing the online bill pay option. See Minnesota Statutes, section 216B.05, subd. 2.

IV. CONCLUSIONS AND RECOMMENDATIONS

The Department has reviewed the modifications to the customer billing statement proposed by Great Plains in the Petition. The Department concludes that the modifications comply with Minnesota Rules and are reasonable.

The Department recommends that the Commission approve Great Plains' Petition.

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CERTIFICATE OF SERVICE

I, Sharon Ferguson, 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-15-566

Dated this 8th day of July 2015

/s/Sharon Ferguson

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|--------------------------------|------------------------------------|--|--------------------|-------------------|------------------------|
| Tamie A. | Aberle | tamie.aberle@mdu.com | Great Plains Natural Gas Co. | 400 North Fourth Street Bismarck, ND 585014092 | Electronic Service | No | OFF_SL_15-566_M-15-566 |
| Julia | Anderson | Julia.Anderson@ag.state.mn.us | Office of the Attorney General-DOC | 1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134 | Electronic Service | Yes | OFF_SL_15-566_M-15-566 |
| Sharon | Ferguson | sharon.ferguson@state.mn.us | Department of Commerce | 85 7th Place E Ste 500 Saint Paul, MN 551012198 | Electronic Service | No | OFF_SL_15-566_M-15-566 |
| John | Lindell | agorud.ecf@ag.state.mn.us | Office of the Attorney General-RUD | 1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130 | Electronic Service | Yes | OFF_SL_15-566_M-15-566 |
| Brian | Meloy | brian.meloy@stinsonleonard.com | Stinson, Leonard, Street LLP | 150 S 5th St Ste 2300 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_15-566_M-15-566 |
| Daniel P | Wolf | dan.wolf@state.mn.us | Public Utilities Commission | 121 7th Place East Suite 350 St. Paul, MN 551012147 | Electronic Service | Yes | OFF_SL_15-566_M-15-566 |