

April 15, 2026

Sasha Bergman
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. G999/PR-25-15

Dear Ms. Bergman,

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

In the Matter of a Petition by Lakes Community Co-op for a Small Gas Utility Franchise Exemption

In the Matter of a Petition by United Natural Gas for a Small Gas Utility Franchise Exemption

In the Matter of a Petition by Lake Region Energy Services for a Small Gas Utility Franchise Exemption

In the Matter of a Petition by Dooley's Natural Gas I for a Small Gas Utility Franchise Exemption

In the Matter of a Petition by Dooley's Natural Gas II for a Small Gas Utility Franchise Exemption

In the Matter of a Petition by Paul Bunyan Natural Gas for a Small Gas Utility Franchise Exemption

In the Matter of a Petition by the Northwest Utilities: (Northwest Natural Gas LLC, Northwest Natural Gas of Murray County LLC, Gorman's Inc. for a Small Gas Utility Franchise Exemption

The seven exempt small gas utilities filed their respective 2025 annual compliance filings between April 29, 2025, and February 24, 2026.

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

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

JK/ad
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. G999/PR-25-15

I. INTRODUCTION

Minnesota Statute 216B.02 subd. 4 allows small natural gas companies that meet certain criteria to be exempted from rate regulation by the Minnesota Public Utilities Commission, (Commission, MPUC).

Instead of being rate regulated by the Commission, these “Exempt Small Gas Utilities” (ESGUs) request via a petition to be exempt from Commission rate-regulation, which allows them to be rate-regulated by the municipality that executed and manages the franchise agreement with the ESGU.

The Commission has approved exemptions for seven ESGU in seven separate dockets beginning in 2013 and ending in 2022. In 2023, the Commission combined the ESGU’s annual compliance filings into one periodic reporting (PR) docket with the recurring docket number of G999/PR-##-15. Each of the ESGU’s is required to file an annual compliance filing (ACF) on May 1 of each year.

II. PROCEDURAL BACKGROUND

April 29, 2025	Lake Region Energy Services filed its 2025 ACF. ¹
April 30, 2025	Dooley’s Natural Gas LLC and Dooley’s Natural Gas II LLC filed their respective 2025 annual compliance filings. ^{2, 3}
May 1, 2025	The Northwest Utilities and United Natural Gas LLC filed their respective 2025 ACFs. ^{4, 5}

¹ *In the Matter of a Petition by Lake Region Energy Services for a Small Gas Utility Franchise Exemption*, Compliance, May 1, 2025, Docket No. G999/PR-25-15 (eDockets) [20254-218297-01](#) (hereinafter “LRES 2025 Compliance”).

² *In the Matter of a Petition by Dooley’s Natural Gas I LLC for a Small Gas Utility Franchise Exemption*, Compliance, May 1, 2025, Docket No. G999/PR-25-15 (eDockets) [20254-218862-01](#) (hereinafter “Dooley’s Natural Gas I 2025 Compliance”).

³ *In the Matter of a Petition by Dooley’s Natural Gas II LLC for a Small Gas Utility Franchise Exemption*, Compliance, May 1, 2025, Docket No. G999/PR-25-15 (eDockets) [20254-218863-01](#) (hereinafter “Dooley’s Natural Gas II 2025 Compliance”).

⁴ *In the Matter of a Petition by The Northwest Utilities: (Northwest Natural Gas LLC, Northwest Natural Gas of Murray County LLC, Gormans Inc.) for a Small Gas Utility Franchise Exemption*, Compliance, May 1, 2025, Docket No. G999/PR-25-15 (eDockets) [20255-218465-01](#) (hereinafter “Northwest Utilities’ Natural Gas 2025 Compliance”).

⁵ *In the Matter of a Petition by United Natural Gas LLC for a Small Gas Utility Franchise Exemption*, Compliance, May 1, 2025, Docket No. G999/PR-25-15 (eDockets) [20255-218450-01](#) (hereinafter “United Natural Gas 2025 Compliance”).

May 5, 2025	Lakes Community Cooperative filed its 2025 ACF in two separate submittals. ^{6, 7}
February 24, 2026	Paul Bunyan Natural Gas LLC filed its 2025 annual compliance filing. ⁸
March 2, 2026	The Commission issued a Notice of Comment period. ⁹

The Commission identified the following issue for this proceeding in its Notice of Comment (NOC).

Should the Minnesota Public Utilities Commission (Commission) accept the compliance filings for the 2024 reporting year submitted by Lakes Community Co-op, United Natural Gas LLC, Lake Region Energy Services, Inc., Dooley's Natural Gas I, LLC, Dooley's Natural Gas II, LLC, Paul Bunyan Natural Gas and The Northwest Utilities: (Northwest Natural Gas LLC, Northwest Natural Gas of Murray County LLC and Gorman's Inc.)?

The Commission also identified the following topics open for comment:

- Have the small gas utilities complied with the Commission's November 9, 2018, Order?
- Are there other issues or concerns related to this matter?

III. DEPARTMENT ANALYSIS

A. INTRODUCTION/RESPONSE TO COMMISSION QUESTIONS

A.1. Procedural Context

The Department initially responds to the one issue and two topics the Commission identified in its NOC. Subsequently, the Department reviews the information provided or acquired relative to each of the ESGUs 2025 annual compliance filings for the 2024 reporting year.

⁶ *In the Matter of a Petition by Lakes Community Co-op for a Small Gas Utility Franchise Exemption, Compliance*, May 5, 2025, Docket No. G999/PR-25-15 (eDockets) [20255-218852-01](#) (hereinafter "Lakes Community Cooperative 2025 Compliance – Meter Count").

⁷ *In the Matter of a Petition by Lakes Community Co-op for a Small Gas Utility Franchise Exemption, Compliance*, May 5, 2025, Docket No. G999/PR-25-15 (eDockets) [20255-218852-02](#) (hereinafter "Lakes Community Cooperative 2025 Compliance").

⁸ *In the Matter of a Petition by Paul Bunyan Natural Gas LLC for a Small Gas Utility Franchise Exemption, Compliance*, February 24, 2026, Docket No. G999/PR-25-15 (eDockets) [20262-228556-01](#) (hereinafter "Paul Bunyan Natural Gas 2025 Compliance").

⁹ *In the Matter of Petitions by Dooley's Natural Gas, Lakes Community Co-op, Lake Region Energy Services, Northwest Utilities, Paul Bunyan Natural Gas and United Natural Gas for Small Gas Utility Franchise Exemptions, Notice*, March 2, 2026, Docket No. G999/PR-25-15 (eDockets) [20263-228843-01](#) (hereinafter "NOC").

A.2. Adequacy of the Different Exempt Small Gas Utilities' 2025 Annual Compliance Filings

After reviewing the different exempt small gas utilities 2025 ACF's and the additional information provided in response to discovery, the Department concludes that all seven of the exempt small gas utilities have provided an adequate level of information to approve their respective 2025 ACFs. The Department does note that the Commission modified certain reporting requirements in its ORDER APPROVING 2021 COMPLIANCE FILINGS AND ADOPTING FUTURE FILING REQUIREMENTS, issued on September 7, 2021, the Commission added three additional reporting requirements to ESGUs annual compliance filings.^{10, 11}

The Department focused its efforts on ensuring compliance with those three reporting requirements in its review of the 2025 ACFs.¹²

A.3. Compliance with Reporting Requirements included in the Commission's November 9, 2018, Order

The Department recommends the Commission approve the 2025 annual compliance filings of each of the seven ESGUs listed:

- Dooley's Natural Gas I LLC and Dooley's Natural Gas II LLC,
- Lakes Community Co-op,
- Lake Region Energy Services,
- The Northwest Utilities, Inc.,

¹⁰ *In the Matter of a Petition by Dooley's Natural Gas LLC for a Small Gas Utility Franchise Exemption*, PUC Order, September 7, 2021, Docket No. G6915/M-13-672 at Order Points 2 through 4 (eDockets) [20219-177733-04](#) (hereinafter "September 7, 2021 Order"). The September 7, 2021, Order also applies to: Docket Nos: G6956/M-15-856, G6960/M-16-214, G6977/M-17-186, G6977/M-17-829 and G6915/M-16-756

¹¹ These three additional reporting requirements were: 1) Future small gas utility franchise annual compliance filings shall provide copies of the utilities' tariffs reflecting the legislatively mandated extension of the Cold Weather Rule period to October 1 to April 30 for residential customers, as well as copies of any updated cold weather disconnection notices. 2) All small gas utilities must continue to comply with Minn. Stat. § 216B.16, subd. 12(b), which states: "The public utility shall file with the commission and the department all initial and subsequent changes in rates, tariffs, and contracts for service outside the municipality at least 30 days in advance of implementation." 3) Future small gas utility franchise annual compliance filings shall provide updated total customer counts for all municipal franchises, the number of customers served under each municipal franchise, and the number of customers served outside of each municipality's border that the utility claims are incidental

¹² These included: 1) Updated customer counts, plus a statement that the utility does not discriminate between in-muni/out-muni customers, and if it does, why; 2) Any municipality-approved rate changes that occurred in the prior year and when these changes went into effect. All small gas utilities must comply with Minn. Stat. § 216B.16, subd. 12(b), which states "The public utility shall file with the commission and the department all initial and subsequent changes in rates, tariffs, and contracts for service outside the municipality at least 30 days in advance of implementation."; 3) All changes to its tariff book in redlined and final revised tariff form; 4) A copy of its cold weather disconnection notice sent to the customers, including how the notice was communicated and date communicated (Minn. Stat. § 216B.096, Minnesota's Cold Weather Rule); 5) A copy of its notice form sent to customers who are in arrears, pursuant to the utility's obligation under Minn. Stat. § 216B.098 – Minnesota's Residential Customer Protections, along with any policy not clearly identified in the tariffs regarding budget billing plans, payment arrangements, and under-charge repayment, and 6) A copy of any utility disconnection reports served to any of the municipalities as required by Minn. Stat. § 216B.0976 – Minnesota's Notice to Cities of Utility Disconnection;

- Paul Bunyan Natural Gas LLC., and
- United Natural Gas LLC.

A.4. Other Issues or Concerns related to this Matter?

The Department's review didn't identify any other issues or concerns related to this matter in the exempt small gas utilities 2025 annual compliance filings.

B. ESGU 2025 ANNUAL COMPLIANCE FILINGS – INDIVIDUAL COMPANY REVIEWS

B.1. Dooley's Natural Gas I LLC and Dooley's Natural Gas II LLC

Dooley's Natural Gas I LLC (Dooley's) was the first small gas utility that requested exempt status from the Commission in 2013. Dooley's then requested a second exemption in 2017 for its Dooley's II Natural LLC subsidiary.¹³ The combined entity is the second largest of the six ESGUs.

The Department identified two questions regarding Dooley's 2025 compliance and issued information request (IR) 1. The Department asked Dooley's: 1) to verify customer numbers were based on the number of customers and not meter-count and 2) to provide the information required in Order Point 4 of the Commission's September 7, 2021, Order.

Table 1 summarizes the information provided in Dooley's Natural Gas I & II's respective 2025 compliance filings and its response to IR 1.

¹³ The Department notes that it combines the information for the two Dooley's ESGU's into one entity for this review.

Table 1 – Combined Dooley’s Natural Gas LLC Compliance Filing Checklist – Calendar Year 2024

Requirement	Information Provided?	Notes/Comments
1. Updated Customer Count (CC).	Yes	Response to IR 1 subpart a.
2. CC reflects number of customers served, not the number of meters installed	Yes	Response to IR 1 subpart a.
3. CC provided for each municipal franchise	Yes	Response to IR 1 subpart b.
4. CC provides the number of municipal and non-municipal customers by municipality	Yes	Response to IR 1 subpart b.
5. Non-discrimination statement or explanation	Yes	Included in the ACF.
6. List of municipality-approved rate/tariff changes in redlined and final form	Yes	Rate increase and or changes in 2024. Clean and red-lined rate book/tariff included in the ACF.
7. Copy of cold weather disconnection notice sent to customers	No	Provided updated form in filing.
8. Date and delivery method for cold weather disconnection notice	Yes	September 10, 2025, email or U.S. mail.
9. Copies of any utility disconnection reports served to any of the municipalities required by statute	Yes	Not providing municipalities utility disconnection reports as municipalities have not requested them. ¹⁴
10. Updated customer past due/arrearage forms	Yes	Provided in filing.
11. Copy of any policy not included in tariff related to budget billing plans, payment arrangements and under-charge repayment.	Yes	Not Applicable – all the information listed is included in the terms and conditions section of Dooley’s rate books and was included in the ACFs.

After reviewing the response to IR 1, the Department concludes Dooley’s complied with the relevant reporting requirements from the Commission’s November 9, 2018, and September 21, 2021, Orders and recommends the Commission approve Dooley’s 2025 compliance filing.¹⁵

B.2. Lakes Community Co-op

Lakes Community Coop (LCC) serves approximately 1,900 customers with a service area located in northwest Minnesota.

The Department identified two questions after reviewing LCC’s 2025 compliance and meter count and issued information request 2, sub-parts 3 and 4 regarding those questions. The Department asked Lakes Community Coop: 1) to verify customer numbers were based on the number of customers and not meter-count and 2) to provide the information required in Order Point 4 of the Commission’s September 7, 2021, Order.

¹⁴ Stated “As per statute since none of the municipalities request notice of disconnection, we currently are not sending any notices to them.”

¹⁵ Attachment 1 includes IR 1, Dooley’s response and an email from Dooley’s regarding the status of information on policies related to budget billing, plans, payment arrangements and under-charge repayment in its tariff.

Table 2 summarizes the information provided in Lakes Community Co-op’s 2025 ACF and its response to IR 2.

Table 2– Lakes Community Co-op Compliance Filing Checklist – Calendar Year 2024

Requirement	Information Provided?	Notes/Comments
1. Updated CC.	Yes	Response to IR 2 subpart a.
2. CC reflects number of customers served, not the number of meters installed	Yes	Response to IR 2 subpart a.
3. CC provided for each municipal franchise	Yes	Response to IR 2 subpart b.
4. CC will provide the number of municipal and incidental (non-municipal) customers by municipality	Yes	Response to IR 2 subpart b.
5. Non-discrimination statement or explanation	Yes	Included in ACF
6. List of municipality-approved rate/tariff changes in redlined and final form	Yes	No changes to base rates in 2024 – included in ACF.
7. Copy of cold weather disconnection notice sent to customers	Yes	No change to information provided in previous ACF, information included in ACF
8. Date and delivery method for cold weather disconnection notice	Yes	August 2, 2025
9. Copies of any utility disconnection reports served to any of the municipalities required by statute	Yes	Not providing municipalities utility disconnection reports as municipalities have not requested them. ¹⁶
10. Updated customer past due/arrearage forms	Yes	Unchanged since last compliance filing – included in ACF
11. Copy of any policy not included in tariff related to budget billing plans, payment arrangements and under-charge repayment.	Yes	April 10 email from LCC staff.

The Department concludes that Lakes Community Co-ops’ compliance filing, when supplemented by its response to Department IR 2, fulfills the reporting requirements included in the Commission’s November 9, 2018, and September 7, 2021, Orders.¹⁷

B.3. Lake Region Energy Services Inc.

Lake Region Energy Services (LRES) serves around 1,100 customers with a service area in west central Minnesota.

¹⁶ Stated “As per statute since none of the municipalities request notice of disconnection, we currently are not sending any notices to them.”

¹⁷ Attachment 2 includes IR 2, LCC’s response and an email from LCC regarding the status of information on policies related to budget billing, plans, payment arrangements and under-charge repayment in its tariff.

The Department identified five questions regarding LRES’s 2025 compliance and issued information request 3, sub-parts 3 and 4 regarding those questions. The Department asked LRES: 1) to verify customer numbers were based on the number of customers and not meter-count, 2) to provide the information required in Order Point 4 of the Commission’s September 7, 2021 Order, 3) to provide documentation by the four municipalities served by LRES for changes to the base cost of gas and delivery charges, 4) the date the changes to the base cost of gas and the delivery charges occurred, and 5) the change in LRES’s base rates due to these changes.

Table 3 summarizes Lake Region Energy Services’ 2025 ACF and its response to IR 3.

Table 3– Lake Region Energy Services LLC Compliance Filing Checklist – Calendar Year 2024

Requirement	Information Provided?	Notes/Comments
1. Updated Customer Count.	Yes	Included in ACF.
2. Customer count reflects number of customers served, not the number of meters installed.	Yes	Response to IR 3 subpart a.
3. Customer Count provided for all municipal franchises,	Yes	Response to IR 3 subpart b.
4. Customer count will provide the number of municipal and incidental (non-municipal) customers by municipality.	Yes	Response to IR 3 subpart b.
5. Non-discrimination statement or explanation	Yes	Included in ACF
6. List of municipality-approved rate/tariff changes in redlined and final form	Yes	No changes to base rates in 2024 – included in ACF.
7. Copy of cold weather disconnection notice sent to customers	Yes	Provided updated form in ACF.
8. Date and delivery method for cold weather disconnection notice	Yes	September 2025 Newsletter
9. Copies of any utility disconnection reports served to any of the municipalities required by statute	Yes	Unchanged since last compliance filing – included in ACF.
10. Updated customer past due/arrearage forms	Yes	Unchanged since last compliance filing – included in ACF
11. Copy of any policy not included in tariff related to budget billing plans, payment arrangements and under-charge repayment.	Yes	Not Applicable – all the information listed is included in the terms and conditions section of LCC’s rate book.

The Department concludes that LRES’ compliance filing, when supplemented by its response to Department information request 3, fulfills the reporting requirements included in the Commission’s November 9, 2018, and September 7, 2021, Orders.¹⁸

¹⁸ Attachment 3 includes IR, LRES’ response and emails from LRES regarding the status of information on policies related to budget billing, plans, payment arrangements and under-charge repayment in its tariff.

B.4. Northwest Utilities Inc.

Northwest Utilities (Northwest) is the largest of the exempt small gas utilities. It has three operating subsidiaries: 1) Northwest Natural Gas, LLC; 2) Northwest Natural Gas of Murray County, Inc., and 3) Northwest Natural Gas of Cass County LLC). Northwest's 2025 compliance filing provided almost all the Commission-required information listed earlier.

The Department only identified two questions regarding compliance with the requirements of the Cold Weather Rule (CWR) information in Northwest's filing and issued information request 6, sub-part A regarding those questions. The Department asked Northwest: 1) to verify that the method it uses to notify its customers of the Cold Weather Rule's (CWR) provisions, and 2) to identify any policies related to budget billing, payment arrangements and under-charge payments. Northwest identified its method for contacting its customer regarding the CWR notice which is the United States Postal Service (USPS) or by email. Northwest also modified its proposed tariff to include that information.

Regarding the policies not included in tariff. Northwest modified its tariff to include a section of payment arrangements consistent with Minn. Stat. 216B.098.

Information request 6, subpart B asked Northwest to verify that its customer numbers were based on the number of customers and not meter-count. Northwest verified that it used number of customers and not meter counts for its reporting.

Table 4 summarizes the information for the three LLCs that are the operating subsidiaries of Northwest Utilities.

Table 4 – Northwest Utilities 2025 Compliance Filing Checklist – Calendar Year 2024

Requirement	Information Provided?	Notes/Comments
1. Updated Customer Count.	Yes	Provided in ACF.
2. Customer count reflects number of customers served, not the number of meters installed.	Yes	Response to IR 6 subpart B.1.
3. Customer Count provided for all municipal franchises,	Yes	Provided in ACF.
4. Customer count will provide the number of municipal and incidental (non-municipal) customers by municipality.	Yes	Provided in ACF.
5. Non-discrimination statement or explanation	Yes	Unchanged – provided in ACF
6. List of municipality-approved rate/tariff changes in redlined and final form	Yes	No rate changes or tariff changes in 2024 – provided in ACF
7. Copy of cold weather disconnection notice sent to customers	Yes	Provided form in ACF.
8. Date and delivery method for cold weather disconnection notice	Yes	September billing cycle – included in ACF
9. Copies of any utility disconnection reports served to any of the municipalities required by statute	Yes	Unchanged since last compliance filing – included in ACF.
10. Updated customer past due/arrearage forms	Yes	Unchanged since last compliance filing – included in ACF.
11. Copy of any policy not included in tariff related to budget billing plans, payment arrangements and under-charge repayment.	Yes	Response to IR 6 subpart A.2. – Northwest’s subsidiaries all modified their tariffs to incorporate this information.

After reviewing the responses to IR 6, the Department concludes Northwest complied with the relevant reporting requirements from the Commission’s November 9, 2018, and September 21, 2021, Orders and recommends the Commission approve Northwest’s 2025 compliance filing.¹⁹

B.5. Paul Bunyan Natural Gas LLC

Paul Bunyan Natural Gas LLC (Paul Bunyan or PBNG) is the newest exempt small gas utility. The Commission approved Paul Bunyan’s request to be classified as an ESGU in its ORDER APPROVING PETITION AND SETTING REQUIREMENTS dated December 5, 2022. In that ORDER, the Commission required Paul Bunyan LLC to report annually on the same information as the other ESGUs. The Department identified two questions regarding compliance with the requirements of the Cold Weather Rule (CWR) information in Paul Bunyan’s 2025 ACF and issued information request 5, sub-part A regarding those questions. The Department asked : 1) to verify the method PBNG uses to notify its customers of the Cold Weather Rule’s (CWR) provisions, and 2) to identify any policies related to

¹⁹ Attachment 4 includes IR 6 and Northwest Utilities’ responses.

budget billing, payment arrangements and under-charge payments. Paul Bunyan identified its method for contacting its customer regarding the CWR notice is the United States Postal Service (USPS) or by email. PBNG also modified its proposed tariff to include that information.

Regarding the policies not included in tariff. Paul Bunyan modified its tariff to include a section of payment arrangements consistent with Minn. Stat. 216B.098.

Information request 5, subpart B asked Paul Bunyan to verify that its customer numbers were based on the number of customers and not meter-count. PBNG verified it used number of customers and not meter counts for its reporting.

Table 5 summarizes Paul Bunyan Natural Gas 2025 compliance filing.

Table 5 – Paul Bunyan Natural Gas, LLC Compliance Filing Checklist – Calendar Year 2024

Requirement	Information Provided?	Notes/Comments
1. Updated Customer Count.	Yes	Included in ACF
2. Customer count reflects number of customers served, not the number of meters installed.	Yes	Response to IR 5 subpart A.1
3. Customer Count provided for all municipal franchises,	Yes	Response to IR 5 subpart A.1
4. Customer count will provide the number of municipal and incidental (non-municipal) customers by municipality.	Yes	Response to IR 5 subpart A.1
5. Non-discrimination statement or explanation	Yes	Unchanged - included in ACF
6. List of municipality-approved rate/tariff changes in redlined and final form	Yes	No rate changes or tariff changes in 2024 – included in ACF
7. Copy of cold weather disconnection notice sent to customers	Yes	Provided form in ACF
8. Date and delivery method for cold weather disconnection notice	Yes	September billing cycle – included in ACF
9. Copies of any utility disconnection reports served to any of the municipalities required by statute	Yes	Unchanged since last compliance filing
10. Updated customer past due/arrearage forms	Yes	Unchanged since last compliance filing
11. Copy of any policy not included in tariff related to budget billing plans, payment arrangements and under-charge repayment.	Yes	Response to IR 5 subpart A.2. – Paul Bunyan Natural Gas modified its tariff to incorporate this information.

After reviewing the responses to IR 5 and its 2025 ACF, the Department concludes Paul Bunyan Natural Gas LLC has complied with the relevant reporting requirements from the Commission’s November 9,

2018, and September 21, 2021, Orders and recommends the Commission approve Paul Bunyan Natural Gas LLC’s 2025 compliance filing.²⁰

B.6. United Natural Gas LLC

United Natural Gas LLC (United or UNG) is the smallest exempt small gas utility in Minnesota, serving between 600 and 700 customers. It is part of Central United Cooperative based in Winthrop, Minnesota.

The Department identified two questions regarding UNG’s 2025 compliance and issued IR 4 regarding those questions. The Department asked United: 1) to verify customer numbers were based on the number of customers and not meter-count and 2) to provide the information required in Order Point 4 of the Commission’s September 7, 2021, Order. United provided the requested information in its response to IR 4.²¹

Table 6 summarizes United Natural Gas’s 2025 compliance filing.

Table 6 – United Natural Gas’s Compliance Filing Checklist – Calendar Year 2024

Requirement	Information Provided?	Notes/Comments
1. Updated Customer Count.	Yes	Customer count by community served
2. Customer count reflects number of customers served, not the number of meters installed.	NA	Response to IR 4 subpart A.1
3. Customer Count provided for all municipal franchises,	NA	Response to IR 4 subpart A.1
4. Customer count will provide the number of municipal and incidental (non-municipal) customers by municipality.	Yes	Response to IR 4 subpart A.1
5. Non-discrimination statement or explanation	Yes	Included in ACF
6. List of municipality-approved rate/tariff changes in redlined and final form	Yes	No rate changes or changes to tariff provisions in 2024 or 2025 – included in ACF
7. Copy of cold weather disconnection notice sent to customers	No	Provided updated form in filing.
8. Date and delivery method for cold weather disconnection notice	Yes	September 1, 2025, U.S. mail.
9. Copies of any utility disconnection reports served to any of the municipalities required by statute	Yes	UNG stated that it had not disconnected any customers in 2024 or 2025. -included in ACF.
10. Updated customer past due/arrearage forms	Yes	
11. Copy of any policy not included in tariff related to budget billing plans, payment arrangements and under-charge repayment.	Yes	United stated all budget billing, payment arrangements and under-charge repayment included in tariff.

²⁰ Attachment 5 includes IR 5 and Paul Bunyan’s response..

²¹ Attachment 6 includes IR 6 and UNG’s response.

The Department concludes United Natural Gas complied with the Order's requirements for Docket No. G6960/M-16-214 for 2025.

C. ESGU CUSTOMER NUMBERS

The Commission requires the ESGU's to provide customer numbers in their annual compliance filings. The Department historically has summarized that information and calculates the annual change in the number of customers served by the ESGUs and the annual percentage change in the number of customers. The number of customers served by all the ESGU' increased by 0.1 percent from December 2023 to December 2024 according to the data provided in their respective 2025 ACFs.²² The same figure for the change in the total number of customers served between December 2022 and December 2023 was 5.3 percent. This suggests the rate of customer growth for the ESGU's in total slowed significantly from 2022-2023 to 2023-2024.

The average annual change for the ESGUs from 2020 through 2024 was 4.7 percent. This is a high average annual growth rate for a natural gas utility when compared to the annual rates of growth for Minnesota's four fully rate regulated natural gas utilities. The Department will monitor this situation on an ongoing basis.

The Department notes that not all the ESGU's provided information on the number of customers served outside of each municipality's border that the utility claims are incidental. Initially, Commission staff historically were the party most interested in the break-down of customers between non-incidental and incidental. If the Commission or its staff want to receive this information from all the ESGUs in subsequent compliance filings, the Commission may want to remind the ESGU's of this reporting requirement in its Order regarding the 2026 compliance filings.

IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of IRs 1 through 6 and the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

A. INTRODUCTION TO COMMISSION'S ISSUE AND TOPICS QUESTIONS AND RESPONSES THE DEPARTMENT HAS NO RECOMMENDATIONS FOR THIS SECTION .

- A.1. The Department has no recommendations for this section .
- A.2. The Department concludes that Dooley's Natural Gas LLC, Dooley's Natural Gas I LLC, Lakes Community Co-op, Lake Region Energy Services, Northwest Utilities, Paul Bunyan Natural Gas LLC and United Natural Gas LLC, have provided sufficient and necessary information to forward a recommendation to the Commission.

²² Department analysis included in Attachment 7.

- A.3. The Department recommends that the Commission find that Dooley’s Natural Gas LLC, Dolley’s Natural Gas I LLC, Lakes Community Co-op, Lake Region Energy Services, Northwest Utilities, Paul Bunyan Natural Gas LLC and United Natural Gas LLC complied with the necessary reporting requirements included in the Commission’s November 9, 2018, Order and approve their respective 2025 ACFs.

B. ESGU 2025 ANNUAL COMPLIANCE FILINGS – INDIVIDUAL COMPANY REVIEWS

- B.1. Dooley’s Natural Gas I LLC and Dooley’s Natural Gas II LLC – The Department recommends that the Commission approve the company’s two 2025 annual compliance filings.
- B.2. Lakes Community Co-op - The Department recommends the Commission approve the co-op’s 2025 annual compliance filing.
- B.3. Lake Region Energy Services Inc. - The Department recommends that the Commission approve the company’s 2025 annual compliance filing.
- B.4. The Northwest Utilities, Inc. - The Department recommends that the Commission approve the company’s 2025 annual compliance filing.
- B.5. Paul Bunyan Natural Gas LLC - The Department recommends that the Commission approve the company’s 2025 annual compliance filing.
- B.6. United Natural Gas LLC - The Department recommends the Commission approve the company’s 2025 annual compliance filing.

C. ESGU CUSTOMER NUMBERS – SUMMARY ANALYSIS

- C.1. - The Department has no recommendations for this section

Attachments

Title	Description	Topic
1	IR 1/Dooley's Natural Gas response	Reporting Requirements
2	IR 2/Lakes Community response	Reporting Requirements
3	IR 3/LRES response	Reporting Requirements
4	IR 6/Northwest Utilities response	Reporting Requirements
5	IR 5/Paul Bunyan Natural Gas	Reporting Requirements
6	IR 4/United Natural Gas	Reporting Requirements
7	ESGU Customer Growth 2020-2024	Analysis



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G999/PR-25-15

Nonpublic Public

Requested From: Nathan DeLeeuw, General Manager, Dooley's Natural Gas LLC

Date of Request: 3/19/2026

Type of Inquiry: General Response

Due: 3/30/2026

SEND RESPONSE VIA **EMAIL** TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): John Kundert

Email Address(es): john.kundert@state.mn.us

Phone Number(s): 651-600-1182

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 1
Topic: Updated Customer Counts for Dooley's Natural Gas I and II
Reference(s): April 29, 2025 compliance filings in Docket Nos. G6915/M-13-672 and G6915/M-16-756

Request:

In its Order dated September 7, 2021, at Order Points 3 and 4, the Minnesota Public Utilities Commission clarified the updated customer count reporting requirement it had included in its previous Order dated November 9, 2018 regarding these dockets.

3. Future small gas utility franchise annual compliance filings shall provide customer counts reflecting the number of persons or businesses served (i.e. customers) rather than a customer count based on the number of meters.
4. Future small gas utility franchise annual compliance filings shall provide the following: updated total customer counts for all municipal franchises, the number of customers served under each municipal franchise, and the number of customers served outside of each municipality's border that the utility claims are incidental.

Given these clarifications,

- a) Are the updated customer counts in the 2025 compliance filings for Dooley's I and II based on the number of customers or the number of meters?
- b) Please provide the information listed in Order Point 4 for all the municipalities with existing franchise agreements listed in Dooley's I and Dooley's II rate books/tariffs.

To be completed by responder

Response Date: April 1, 2026

Response by: Nathan DeLeeuw

Email Address: ndeleeuw@dooleypetro.com

Phone Number: 320-403-4275



RE: Response to Information on Docket Number: G999/PR-25-15 Dated 3-19-2026

Request Number: 1

Topic: Updated Customer Counts for Dooley's Natural Gas I and II

Reference(s): April 29, 2025 compliance filings in Docket Nos. G6915/M-13-672 and G6915/M-16-756

a) Are the updated customer counts in the 2025 compliance filings for Dooley's I and II based on the number of customers or the number of meters?

Response: The customer counts supplied in the filing on April 29, 2025, were based on the number of meters. These counts have been updated by the number of customer premises and have been attached.

b) Please provide the information listed in Order Point 4 for all the municipalities with existing franchise agreements listed in Dooley's I and Dooley's II rate books/tariffs.

Response: The customer counts supplied in the filing on April 29, 2025, have been updated and listed per municipal franchise along with incidental use outside of a municipality. These updates are attached.

If there are any questions or if additional actions are needed, please contact me via email or by calling 320-235-2466.

Sincerely,

Nathan DeLeeuw
General Manager
Dooley's Natural Gas

Dooleys Natural Gas, LLC
Annual Reporting: Docket No. 13-672

Customer Count by Municipality	<u>December 31, 2024</u>
Blomkest	60
Clara City	531
Maynard	140
Prinsburg	219
Raymond	295
Roseland	31
Svea	35
Total Municipal Customer Count	1,311
Incidental	93

Dooleys Natural Gas II, LLC Annual Reporting: Docket No. 16-756

Customer Count by Municipality	<u>December 31, 2024</u>
Belgrade	220
Brooten	194
Total Municipal Customer Count	414
Incidental	77

From: Kundert, John (COMM) <john.kundert@state.mn.us>
Sent: Thursday, April 2, 2026 9:22 AM
To: Nate DeLeeuw <NDeleeuw@dooleypetro.com>
Subject: RE: Information Request for Docket Number: G999/PR-25-15

Hi Nate –

Thanks for the response. It includes the information I requested. I also have one more question for you unfortunately. Does Dooley's I or II's tariffs no include all of the Company's policies related to budget billing plans, payment arrangements and under-charge repayment? I wouldn't think so, but I have to ask.

John Kundert Financial Analyst 651-539-1740
mn.gov/commerce
Minnesota Department of Commerce

Morning John,

Yes, all that information is included in the terms and conditions sections of each of the rate books.

Let me know if you need anything else!

Thanks,

Nate

Meter Count and Location

Town	Meters in town	Customers	Incidental Meters	Customers
Beltrami	24	22	4	4
Fertile	173	159	13	11
Fisher	98	92	6	4
Gary	100	84	15	9
Mahnomen	322	252	45	39
Red Lake Falls	274	240	15	11
Twin Valley	226	197	20	16
Waubun	74	59	1	1
Totals	1291	1105	119	95

Total meters Total Customers

28	26
186	170
104	96
115	93
367	291
289	251
246	213
75	60

1410	1200
-------------	-------------

From: [Jake Swiers](#)
To: [MN_COMM_UTILITY_Discovery](#)
Cc: [Kundert, John \(COMM\)](#)
Subject: Updated customer counts for Lakes Community Coop
Date: Friday, April 10, 2026 10:21:02 AM
Attachments: [Meter Counts 2025.pdf](#)

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Please see the attached info.

Docket # G999/PR-25-15

Request #2

Respondent name and title: Jake Swiers- Energy Manager

No other changes have been made to our rate book or tariff policy.

Thank you,

Jake Swiers

Lakes Community Cooperative



Lakes Community Cooperative



Request Number: 2
Topic: Updated Customer Counts for Lakes Community Coop
Reference(s): May 5, 2025 compliance filings in Docket Nos. G999/PR-25-15 and G6956/M-15-856

Request:

In its Order dated September 7, 2021, at Order Points 3 and 4, the Minnesota Public Utilities Commission clarified the updated customer count reporting requirement it had included in its previous Order dated November 9, 2018 regarding these dockets.

3. Future small gas utility franchise annual compliance filings shall provide customer counts reflecting the number of persons or businesses served (i.e. customers) rather than a customer count based on the number of meters.
4. Future small gas utility franchise annual compliance filings shall provide the following: updated total customer counts for all municipal franchises, the number of customers served under each municipal franchise, and the number of customers served outside of each municipality's border that the utility claims are incidental.

Given these clarifications,

- a) Lakes Community Coop identifies the number of customers as of 12/31/2024 as being 1,165, which is consistent with the Commission's reporting requirement. The additional data provided includes Meter Count and Location for determining the number of incidental and municipal customer counts in the 2025 compliance filing and lists 1363 meters.
- b) Please provide the information listed in Order Point 4 for all the municipalities with existing franchise agreements listed in Lakes Community Coop's rate book for the number of customers, not meters.

March 30, 2026

Via Email: Utility.Discovery@state.mn.us

Minnesota Department of Commerce
Attn: John Kundert
85 7th Place East, Suite 280
St. Paul, MN 55101
also via email: john.kundert@state.mn.us

RE: Lake Region Energy Services, Inc.
Small Gas Utility Franchise Exemption
Responses To Information Requests Dated March 19, 2026
Docket No. 25-15

Lake Region Energy Services, Inc. (“LRES”) submitted two Petitions for Small Gas Utility Exemption pursuant to Minn. Stat. § 216B.16, Subd. 12(b) concerning the municipalities of Deer Creek and Parkers Prairie [Docket No. G-6977/M-17-186] and Dent and Miliona [Docket No. G-6977/M-17-829] on March 6, 2017 and November 30, 2017, respectively. The Commission granted these Petitions, after hearings, by subsequent orders dated July 28, 2017 and March 29, 2018.

On March 19, 2026, the Minnesota Department of Commerce issued an Information Request to LRES. Attached hereto please find LRES’s responses to the request and the information requested therein.

Should the Department have any additional questions or requests for LRES, please do not hesitate to contact the undersigned.

Sincerely,



Chad R. Felstul, No. 0345684
Ryan D. Fullerton, No. 0398363
Pemberton Law, P.L.L.P.
110 North Mill Street
Fergus Falls, Minnesota 56537
Telephone: (218) 736-5493
Email: c.felstul@pemplaw.com
r.fullerton@pemplaw.com

**State of Minnesota
Public Utilities Commission**

Department Of Commerce Information Request

Docket Numbers: G-999/PR-25-15; G-6977/M-17-186; & G-6977/M-17-829 **Date of Request:** March 19, 2026

Company: Lake Region Energy Services, LLC **Response Due:** March 30, 2026

RE: Updated Customer Counts For Lake Region Energy Services;
Reference To: April 29, 2025 Compliance Filings In Docket Nos.: G-999/PR-25-15;
G-6977/M-17-186; & G-6977/M-17-829

Assigned Analyst: John Kundert

Type of Inquiry: General Response

REQUEST

In its Order dated September 7, 2021, at Order Points 3 and 4, the Minnesota Public Utilities Commission (Commission) clarified the updated customer count reporting requirement it had included in its previous Order dated November 9, 2018 regarding these dockets.

3. Future small gas utility franchise annual compliance filings shall provide customer counts reflecting the number of persons or businesses served (i.e. customers) rather than a customer count based on the number of meters.
4. Future small gas utility franchise annual compliance filings shall provide the following: updated total customer counts for all municipal franchises, the number of customers served under each municipal franchise, and the number of customers served outside of each municipality's border that the utility claims are incidental.

Given these clarifications,

- a) Lake Region Energy Services (LRES) provided the number of customers by customer class as of 1/31/2025 in its 2025 compliance filing. Please verify that the information in the table provided is based on customers, not meters.
- b) Please provided the information listed in Order Point 4 for all the municipalities with existing franchise agreements listed in LRES's rate book.
- c) Please provide documentation supporting LRES's statement that representatives of

each of the municipalities served by LRES (Dent, Miltona, Parkers Prairie, and Deer Creek) have approved adjustments to the base cost of natural gas and delivery charges.

- d) When did the proposed changes to the base cost of natural gas and delivery charges become effective.
- e) What is the forecasted change in LRES’s revenue from base rates due to these changes?

RESPONSE

LRES provides the following responses to the request. For your convenience, LRES will address each sub-part to the request in turn:

- a) **Lake Region Energy Services (LRES) provided the number of customers by customer class as of 1/31/2025 in its 2025 compliance filing. Please verify that the information in the table provided is based on customers, not meters.**

LRES verifies that the referenced compliance filing referred to customer count by actual customers, not meters.

In its 2026 annual compliance filing and in all subsequent compliance filings, LRES will include continuing certification that its customer count is by customer, and not by meter.

- b) **Please provided the information listed in Order Point 4 for all the municipalities with existing franchise agreements listed in LRES’s rate book.**

LRES customer counts, divided between customers within each municipality, and customers incidental to municipal service, are as follows:

Total Customers By Location	2025 Year End
Municipal – Dent	69
Municipal – Miltona	149
Municipal – Parkers Prairie	169
Municipal – Deer Creek	57
Incidental (rural) (all other customers)	795

In its 2026 compliance filing and in all subsequent filings, LRES will include updated customer counts in the manner set forth above, in addition to its customer count by customer class.

- c) Please provide documentation supporting LRES’s statement that representatives of each of the municipalities served by LRES (Dent, Miltona, Parkers Prairie, and Deer Creek) have approved adjustments to the base cost of natural gas and delivery charges.**

The oversight bodies for each municipality approved the rate book as amended April 3, 2025¹ on the following dates: The effective date for each was June 1, 2025. Please see Attachment 1, attached hereto.

LRES’s franchise agreements with each municipality create oversight bodies comprised of representatives from LRES and each municipality, which must approve changes to the LRES rate book, including changes to rates or fees. The Council for each of the four municipalities served by LRES has appointed that city’s mayor to serve as its representative. These LRES and municipality representative generally keep in routine contact, and usually confer at least once per year.

- d) When did the proposed changes to the base cost of natural gas and delivery charges become effective?**

LRES’s rate book, as amended April 3, 2025, was effective as of June 1, 2025. See Attachment 1, attached hereto.

LRES notes that its rate book was amended as of December 2, 2025 approved by each municipality representative. Documentation of each approval will be filed with LRES’s 2026 annual compliance filing. LRES will include documentation of each municipality’s approval in its 2026 compliance filing and in future compliance filings as applicable.

- e) What is the forecasted change in LRES’s revenue from base rates due to these changes?**

As to the amendment to base rates effective June 1, 2025, LRES projected no additional revenue. The base cost of gas increased by the same amount that delivery charges decreased. The per-therm price paid by customers remained the same.

As to the amendment described above in subpart (d), as approved by each municipality, LRES again expects no additional revenue. This is because, again, the base cost of gas increases by the same amount that delivery charges decreased. LRES notes that the base cost of gas is a pass-through cost necessary to LRES’s continued operation.

[The remainder of this page is intentionally left blank.]

¹ The “as amended” date refers to the date the proposed amendment(s) were made and proposed—not when they were approved by the municipalities or became effective

Dated: March 30, 2026

Respectfully submitted,



Dylan Aafedt
Vice President, Business Solutions
Lake Region Energy Services, Inc.
1401 South Broadway
Pelican Rapids, MN 56572



Chad R. Felstul, No. 0345684
Ryan D. Fullerton, No. 0398363
Pemberton Law, P.L.L.P.
110 North Mill Street
Fergus Falls, Minnesota 56537
Telephone: (218) 736-5493
Email: c.felstul@pemplaw.com
r.fullerton@pemplaw.com

ATTACHMENT 1

Municipality Commission Approvals For 2025 Rate Book Amendment

**RESOLUTION OF THE COMMISSIONERS
OF THE
DENT UTILITIES BOARD**

Approving Rate Book as Amended April 3, 2025

The Commissioners of the Dent Utilities Board (also known as the Dent Natural Gas Commission), having convened at the request of one or more Commissioners on April 11, 2025, adopts the following resolutions as formal action of the Commission, which are hereby recorded in writing.

RECITALS

WHEREAS, Lake Region Energy Services, Inc. (“**LRES**”) has been granted a franchise by the City Council for the City of Dent (“**City**”) to construct and operate natural gas facilities and to operate a natural gas utility for the benefit of public and private customers within each City and surrounding areas; and

WHEREAS, the provisions of said City Ordinance establish a Commission comprised of one (1) representative appointed by the City and two (2) representatives appointed by LRES, which has the sole authority to regulate gas retail rates within the City (“**Commission**”); and

WHEREAS, the City has duly appointed Dawn Boyne as its representative to serve on the Commission, and LRES has duly appointed Dan Husted and Dylan Aafedt as its representatives to serve on the Commission, and each undersigned Commissioner represents that he or she has not resigned said appointment or otherwise been removed or suspended and has lawful authority to serve on the Commission; and

WHEREAS, the Commission has convened at the request of at least one Commissioner to discuss the affairs of the Commission, to review the LRES Rate Book, and to take other appropriate action; and

WHEREAS, the Commissioners have determined it to be in the best interests of the City, and the public and private natural gas customers therein, to amend the LRES Rate Book as shown in the attached Exhibit A attached hereto and incorporated herein; and

WHEREAS, the Commissioners have determined that it is in the best interest of the Commission that a designated Commissioner serve as the Secretary of the Commission, so that meeting minutes and resolutions of the Commission may be taken and made available to the City Council and to the LRES Board of Directors, as required by the Commission.

NOW, THEREFORE, BE IT:

RESOLVED, that the proposed Rate Book modifications contained within the attached Exhibit A are hereby adopted and approved and shall be effective as of June 1, 2025, which is no less than thirty (30) days from the date of this Resolution.

FURTHER RESOLVED, that Commissioner Dylan Aafedt is hereby designated as the Secretary of the Commission and shall record meeting minutes for all formal meetings of the Commissioners in which Commission business is discussed.

FURTHER RESOLVED, that the said meeting minutes and all formal resolutions of this Commission shall be recorded in writing and shall be made available to the City, and any resident thereof, and LRES, and any officer or director thereof, upon written request made to the Commission or to any Commissioner.

FURTHER RESOLVED, that the Commissioner appointed by the City shall make all formal resolutions of this Commission available to the City Council, and that the Secretary of the Commission shall make all formal resolutions of this Commission available to the LRES Board of Directors.

EFFECTIVE DATE OF RESOLUTIONS

RESOLVED, that the effective date of the aforesaid resolutions shall be the date on which the last of the undersigned executes this instrument.

IN WITNESS WHEREOF, the undersigned, the duly appointed Commissioners of the Dent Natural Gas Commission, hereby certify that the foregoing resolutions of the Commissioners of the Commission were adopted at a meeting of the Commissioners, at which all Commissioners were present and duly authorized to take such action, and that such action was taken on and as of the stated Effective Date.


Dawn Boyne (Apr 21, 2025 13:26 CDT)

Mayor of Dent
Commissioner (City)

Dated: 04/21/2025


Dan Husted (Apr 30, 2025 08:51 CDT)

Dan Husted
Commissioner (LRES)

Dated: 04/30/2025


Dylan Aafedt

Dylan Aafedt
Commissioner (LRES)

Dated: 04/29/2025

**RESOLUTION OF THE COMMISSIONERS
OF THE
MILTONA UTILITIES BOARD**

Approving Rate Book as Amended April 3, 2025

The Commissioners of the Miltona Utilities Board (also known as the Miltona Natural Gas Commission) adopts the following resolutions as formal action of the Commission, which are hereby recorded in writing.

RECITALS

WHEREAS, Lake Region Energy Services, Inc. (“**LRES**”) has been granted a franchise by the City Council for the City of Miltona (“**City**”) to construct and operate natural gas facilities and to operate a natural gas utility for the benefit of public and private customers within each City and surrounding areas; and

WHEREAS, the provisions of said City Ordinance establish a Commission comprised of one (1) representative appointed by the City and two (2) representatives appointed by LRES, which has the sole authority to regulate gas retail rates within the City (“**Commission**”); and

WHEREAS, the City has duly appointed Alan Bettermann as its representative to serve on the Commission, and LRES has duly appointed Dan Husted and Dylan Aafedt as its representatives to serve on the Commission, and each undersigned Commissioner represents that he or she has not resigned said appointment or otherwise been removed or suspended and has lawful authority to serve on the Commission; and

WHEREAS, the Commission has convened at the request of at least one Commissioner to discuss the affairs of the Commission, to review the LRES Rate Book, and to take other appropriate action; and

WHEREAS, the Commissioners have determined it to be in the best interests of the City, and the public and private natural gas customers therein, to amend the LRES Rate Book as shown in the attached Exhibit A attached hereto and incorporated herein; and

WHEREAS, the Commissioners have determined that it is in the best interest of the Commission that a designated Commissioner serve as the Secretary of the Commission, so that meeting minutes and resolutions of the Commission may be taken and made available to the City Council and to the LRES Board of Directors, as required by the Commission.

NOW, THEREFORE, BE IT:

RESOLVED, that the proposed Rate Book modifications contained within the attached Exhibit A are hereby adopted and approved and shall be effective as of June 1, 2025, which is no less than thirty (30) days from the date of this Resolution.

FURTHER RESOLVED, that Commissioner Dylan Aafedt is hereby designated as the Secretary of the Commission and shall record meeting minutes for all formal meetings of the Commissioners in which Commission business is discussed.


FURTHER RESOLVED, that the said meeting minutes and all formal resolutions of this Commission shall be recorded in writing and shall be made available to the City, and any resident thereof, and LRES, and any officer or director thereof, upon written request made to the Commission or to any Commissioner.

FURTHER RESOLVED, that the Commissioner appointed by the City shall make all formal resolutions of this Commission available to the City Council, and that the Secretary of the Commission shall make all formal resolutions of this Commission available to the LRES Board of Directors.

EFFECTIVE DATE OF RESOLUTIONS

RESOLVED, that the effective date of the aforesaid resolutions shall be the date on which the last of the undersigned executes this instrument.

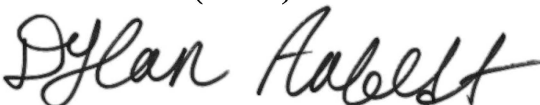
IN WITNESS WHEREOF, the undersigned, the duly appointed Commissioners of the Dent Natural Gas Commission, hereby certify that the foregoing resolutions of the Commissioners of the Commission were adopted at a meeting of the Commissioners, at which all Commissioners were present and duly authorized to take such action, and that such action was taken on and as of the stated Effective Date.


Alan Bettermann (May 15, 2025 22:42 CDT)
Mayor of Miltona
Commissioner (City)

Dated: 05/15/2025


Dan Husted (May 16, 2025 09:00 CDT)
Dan Husted
Commissioner (LRES)

Dated: 05/16/2025


Dylan Aafedt
Dylan Aafedt
Commissioner (LRES)

Dated: 05/16/2025

**RESOLUTION OF THE COMMISSIONERS
OF THE
PARKERS PRAIRIE UTILITIES BOARD**

Approving Rate Book as Amended April 3, 2025

The Commissioners of the Parkers Prairie Utilities Board (also known as the Parkers Prairie Natural Gas Commission), adopts the following resolutions as formal action of the Commission, which are hereby recorded in writing.

RECITALS

WHEREAS, Lake Region Energy Services, Inc. (“**LRES**”) has been granted a franchise by the City Council for the City of Parkers Prairie (“**City**”) to construct and operate natural gas facilities and to operate a natural gas utility for the benefit of public and private customers within each City and surrounding areas; and

WHEREAS, the provisions of said City Ordinance establish a Commission comprised of one (1) representative appointed by the City and two (2) representatives appointed by LRES, which has the sole authority to regulate gas retail rates within the City (“**Commission**”); and

WHEREAS, the City has duly appointed Kevin Birkholz as its representative to serve on the Commission, and LRES has duly appointed Dan Husted and Dylan Aafedt as its representatives to serve on the Commission, and each undersigned Commissioner represents that he or she has not resigned said appointment or otherwise been removed or suspended and has lawful authority to serve on the Commission; and

WHEREAS, the Commission has convened at the request of at least one Commissioner to discuss the affairs of the Commission, to review the LRES Rate Book, and to take other appropriate action; and

WHEREAS, the Commissioners have determined it to be in the best interests of the City, and the public and private natural gas customers therein, to amend the LRES Rate Book as shown in the attached Exhibit A attached hereto and incorporated herein; and

WHEREAS, the Commissioners have determined that it is in the best interest of the Commission that a designated Commissioner serve as the Secretary of the Commission, so that meeting minutes and resolutions of the Commission may be taken and made available to the City Council and to the LRES Board of Directors, as required by the Commission.

NOW, THEREFORE, BE IT:

RESOLVED, that the proposed Rate Book modifications contained within the attached Exhibit A are hereby adopted and approved and shall be effective as of June 1, 2025, which is no less than thirty (30) days from the date of this Resolution.

FURTHER RESOLVED, that Commissioner Dylan Aafedt is hereby designated as the Secretary of the Commission and shall record meeting minutes for all formal meetings of the Commissioners in which Commission business is discussed.

FURTHER RESOLVED, that the said meeting minutes and all formal resolutions of this Commission shall be recorded in writing and shall be made available to the City, and any resident thereof, and LRES, and any officer or director thereof, upon written request made to the Commission or to any Commissioner.

FURTHER RESOLVED, that the Commissioner appointed by the City shall make all formal resolutions of this Commission available to the City Council, and that the Secretary of the Commission shall make all formal resolutions of this Commission available to the LRES Board of Directors.

EFFECTIVE DATE OF RESOLUTIONS

RESOLVED, that the effective date of the aforesaid resolutions shall be the date on which the last of the undersigned executes this instrument.

IN WITNESS WHEREOF, the undersigned, the duly appointed Commissioners of the Parkers Prairie Natural Gas Commission, hereby certify that the foregoing resolutions of the Commissioners of the Commission were adopted at a meeting of the Commissioners, at which all Commissioners were present and duly authorized to take such action, and that such action was taken on and as of the stated Effective Date.

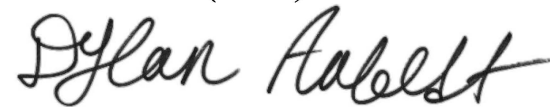
 (Apr 28, 2025 13:37 CDT)

Mayor of Parkers Prairie
Commissioner (City)



Dan Husted (Apr 30, 2025 08:49 CDT)

Dan Husted
Commissioner (LRES)



Dylan Aafedt
Commissioner (LRES)

Dated: 04/28/2025

Dated: 04/30/2025

Dated: 04/29/2025

**RESOLUTION OF THE COMMISSIONERS
OF THE
DEER CREEK UTILITIES BOARD**

Approving Rate Book as Amended April 3, 2025

The Commissioners of the Deer Creek Utilities Board (also known as the Deer Creek Natural Gas Commission), having convened at the request of one or more Commissioners on April 17, 2025, adopts the following resolutions as formal action of the Commission, which are hereby recorded in writing.

RECITALS

WHEREAS, Lake Region Energy Services, Inc. (“LRES”) has been granted a franchise by the City Council for the City of Deer Creek (“City”) to construct and operate natural gas facilities and to operate a natural gas utility for the benefit of public and private customers within each City and surrounding areas; and

WHEREAS, the provisions of said City Ordinance establish a Commission comprised of one (1) representative appointed by the City and two (2) representatives appointed by LRES, which has the sole authority to regulate gas retail rates within the City (“Commission”); and

WHEREAS, the City has duly appointed Troy Beiswenger as its representative to serve on the Commission, and LRES has duly appointed Dan Husted and Dylan Aafedt as its representatives to serve on the Commission, and each undersigned Commissioner represents that he or she has not resigned said appointment or otherwise been removed or suspended and has lawful authority to serve on the Commission; and

WHEREAS, the Commission has convened at the request of at least one Commissioner to discuss the affairs of the Commission, to review the LRES Rate Book, and to take other appropriate action; and

WHEREAS, the Commissioners have determined it to be in the best interests of the City, and the public and private natural gas customers therein, to amend the LRES Rate Book as shown in the attached Exhibit A attached hereto and incorporated herein; and

WHEREAS, the Commissioners have determined that it is in the best interest of the Commission that a designated Commissioner serve as the Secretary of the Commission, so that meeting minutes and resolutions of the Commission may be taken and made available to the City Council and to the LRES Board of Directors, as required by the Commission.

NOW, THEREFORE, BE IT:

RESOLVED, that the proposed Rate Book modifications contained within the attached Exhibit A are hereby adopted and approved and shall be effective as of June 1, 2025, which is no less than thirty (30) days from the date of this Resolution.

FURTHER RESOLVED, that Commissioner Dylan Aafedt is hereby designated as the Secretary of the Commission and shall record meeting minutes for all formal meetings of the Commissioners in which Commission business is discussed.


FURTHER RESOLVED, that the said meeting minutes and all formal resolutions of this Commission shall be recorded in writing and shall be made available to the City, and any resident thereof, and LRES, and any officer or director thereof, upon written request made to the Commission or to any Commissioner.

FURTHER RESOLVED, that the Commissioner appointed by the City shall make all formal resolutions of this Commission available to the City Council, and that the Secretary of the Commission shall make all formal resolutions of this Commission available to the LRES Board of Directors.

EFFECTIVE DATE OF RESOLUTIONS

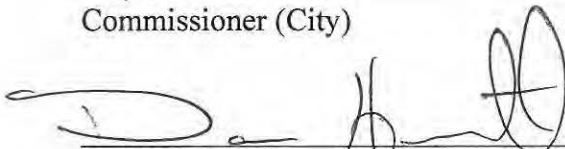
RESOLVED, that the effective date of the aforesaid resolutions shall be the date on which the last of the undersigned executes this instrument.

IN WITNESS WHEREOF, the undersigned, the duly appointed Commissioners of the Deer Creek Natural Gas Commission, hereby certify that the foregoing resolutions of the Commissioners of the Commission were adopted at a meeting of the Commissioners, at which all Commissioners were present and duly authorized to take such action, and that such action was taken on and as of the stated Effective Date.




Mayor of Deer Creek
Commissioner (City)

Dated: 4/17/25



Dan Husted
Commissioner (LRES)

Dated: 4/30/25



Dylan Aafedt
Commissioner (LRES)

Dated: 04/19/2025

From: [Ryan Fullerton](#)
To: [Kundert, John \(COMM\)](#)
Cc: [Kirby Nelson](#); [Casey Carlson](#); [Tracy Chaput](#)
Subject: RE: LRES Response To Information Requests
Date: Wednesday, April 8, 2026 3:18:33 PM
Attachments: [image002.png](#)
[RE LRES 2022 and 2023 Compliance Filings - Docket Nos. G6977M-17-186 and G6077M-17-829 .msg](#)

John,

Thanks for your patience in us getting back to you. I have reviewed these questions with LRES, and the responses are as follows:

1. That is correct, the mailer was sent around January 5, 2025 and paperless customers received it around the same time. Please note that we recognized the mailing date as we were preparing this year's compliance filing, and LRES does intend to send the cold weather language prior to Oct. 1. We also note that LRES has a cold weather page on its website: <https://lakeregionenergy.com/my-account/cold-weather-rule/>. Finally, LRES has not disconnected any residential customer during the cold weather months at any time since its inception.
2. No, LRES does not have policies except as stated in the rate book. As we have previously noted, LRES is a subsidiary of LREC and so in the past, LRES has referenced related LREC policies covering budget billing plans, payment arrangements, and under-charge arrangements. Those are LREC policies 604, 607, and 608. These are not strictly applicable to LRES as they are LREC policies, but when customers of LRES do contact LRES seeking information or accommodations on these topics, LRES staff will refer to the LREC policy for guidance.

I am attaching our comments on this subject which date back to 2024, for reference. Note that LRES is reviewing these policies and will determine which might be appropriate for inclusion into the rate book and which are better left as reference material.

I hope this helps—please let me know if you need any additional information.

Thanks!

Ryan

From: Kundert, John (COMM) <john.kundert@state.mn.us>
Sent: Tuesday, March 31, 2026 2:15 PM
To: Ryan Fullerton <r.fullerton@pemplaw.com>
Cc: Kirby Nelson <Kirby.Nelson@pemplaw.com>; Casey Carlson <c.carlson@pemplaw.com>; Tracy Chaput <t.chaput@pemplaw.com>

Subject: RE: LRES Response To Information Requests

Hi Ryan –

I reviewed LRES' responses to the discovery. It all looks fine. I do have a couple of minor follow-up questions however. 1) When was the LRES newsletter included Attachment C mailed/emailed to customers? My guess is January, but that is only a guess. 2) Does LRES currently have any policy not included in tariff related to budget billing plans, payment arrangements and under-charge repayment? I think we have covered this topic in earlier compliance filings, but I thought I had better ask again.

Regards,

John Kundert

Financial Analyst

651-539-1740

mn.gov/commerce

Minnesota Department of Commerce

85 7th Place East, Suite 280 | Saint Paul, MN 55101



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From: Ryan Fullerton <r.fullerton@pemplaw.com>

Sent: Monday, March 30, 2026 3:14 PM

To: MN_COMM_Utility Discovery <utility.discovery@state.mn.us>; Kundert, John (COMM)

<john.kundert@state.mn.us>

Cc: Kirby Nelson <Kirby.Nelson@pemplaw.com>; Casey Carlson <c.carlson@pemplaw.com>; Tracy Chaput <t.chaput@pemplaw.com>

Subject: LRES Response To Information Requests

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Operations Center.

Mr. Kundert,

Attached is Lake Region Energy Services's response to the information requests dated March 19, 2026.

Please let me know if you have any questions.

Thanks,

Ryan



Ryan D. Fullerton, Attorney
Pemberton Law, P.L.L.P.
110 North Mill Street
Fergus Falls, MN 56537
218-736-5493
r.fullerton@pemlaw.com

****Attorney Client Privileged Document****

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Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G999/PR-25-15

Requested From: Rachel Sorrentino, Managing Director, Northwest Utilities

Type of Inquiry: General

Nonpublic Public

Date of Request: 3/19/2026

Response Due: 3/30/2026

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): John Kundert

Email Address(es): john.kundert@state.mn.us

Phone Number(s): 651-600-1182

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number:	6
Topic:	Cold Weather Rule Compliance and Updated Customer Counts for Northwest Natural Gas LLC, Northwest Natural Gas of Murray County, Inc. and Northwest Natural Gas of Cass County
Reference(s):	May 1, 2025 compliance filing in Docket No. G999/PR-25-15

Request:

- A. In its Order dated November 9, 2021, at Order Points 3.D and 3.F, the Minnesota Public Utilities Commission required exempt small gas utilities to provide the following information in their respective annual compliance report.
 - D. A copy of the cold weather disconnection notice sent to customers, including how the notice was communicated and date communicated (Minn. Stat. § 216B.096, Minnesota's Cold Weather Rule).
 - F. A copy of its notice form sent to customers who are in arrears pursuant to the utility's obligation under Minn. Stat. § 216B.098 – Minnesota's Residential Customer Protections, along with any policy not clearly identified in the tariffs regarding budget billing plans, payment arrangements, and under-charge repayment.
- A.1 Beginning with Order Point 3.D, the Company provided almost all the information required except for the method of communication to customers regarding the CWR. Does Northwest Utilities use the United States Postal Service to deliver this information or does it also use different method of communication like email or both?

(Continued on next page)

Response: We utilize the USPS for new customer packets, monthly bills and Notice of Proposed Disconnection and the Cold Weather Rule. We also include a copy for those who are paperless statements.

To be completed by responder

Response Date: 03/25/26

Response by: Cheri Landsteiner

Email Address: cheri@nwnogas.com

Phone Number: 507-524-4103



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G999/PR-25-15

Requested From: Rachel Sorrentino, Managing Director, Northwest Utilities

Type of Inquiry: General

Nonpublic Public

Date of Request: 3/19/2026

Response Due: 3/30/2026

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): John Kundert

Email Address(es): john.kundert@state.mn.us

Phone Number(s): 651-600-1182

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

A.2 Does the Company have any policies that are not clearly identified in the tariffs regarding budget billing plans, payment arrangements, and under-charge payments?

Response:

We have added the following to our compliance filing to cover items in question:

PAYMENT ARRANGEMENTS

In compliance with Minn. Stat 216B.098, the Company shall offer payment arrangements for the payment of arrears and undercharges. Payment arrangements will consider a customer's financial circumstances and any extenuating circumstances of the household. No additional service deposit will be charged as a consideration to continue service to a customer who has entered and is reasonably on time under an accepted payment arrangement.

The Company shall offer a payment agreement to customers who have been undercharged if no culpable conduct by the customer or resident of the customer's household caused the undercharge. The agreement will cover a period equal to the time over which the undercharge occurred or a different time that is mutually agreeable to the customer and the Company. No interest or delinquency fee will be charged as part of an undercharge agreement under this section.

BUDGET BILLING PLAN

Our Budget Plan is a 12-month program in which you Budget Plan payments begin in August and runs through the following July. Each following year, your August bill will be adjusted to your new budget payment amount. If your account was previously on the Budget Plan and has a balance remaining (either owing or credit), your new budget amount will be increased or decreased accordingly. Northwest Gas calculates your budget plan amount based on the past consumption of natural gas, projected natural gas prices and normal weather conditions. By averaging your natural gas payments over several months, the Budget Plan help you avoid the payment peaks caused by cold winter weather. Customers with up-to-date accounts are eligible to enroll in the Budget Plan. If joining after the August start of the program, payment amounts will be prorated over the remaining months of the program year. Periodically we will review your payment amount and make necessary changes based on current weather and natural gas price. Payments are due in full each month by the due date. If the account is two months behind in payments, the account will be removed from the plan. The customer has the option to cancel the plan at any time. Upon cancellation the Budget Plan balance will be applied to your account.

To be completed by responder

Response Date: 03/25/2026

Response by: Cheri Landsteiner

Email Address: cheri@nwingas.com

Phone Number: 507-524-4103



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G999/PR-25-15

Requested From: Rachel Sorrentino, Managing Director, Northwest Utilities

Type of Inquiry: General

Nonpublic Public

Date of Request: 3/19/2026

Response Due: 3/30/2026

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): John Kundert

Email Address(es): john.kundert@state.mn.us

Phone Number(s): 651-600-1182

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number:	##
Topic:	Cold Weather Rule Compliance and Updated Customer Counts for Northwest Natural Gas LLC, Northwest Natural Gas of Murray County, Inc. and Northwest Natural Gas of Cass County
Reference(s):	May 1, 2025 compliance filings in Docket Nos. G999/PR-25-15

Request:

- B. In its Order dated September 7, 2021, at Order Point 3, the Minnesota Public Utilities Commission clarified the updated customer count reporting requirement it had included in its previous Order dated November 9, 2018 regarding these dockets.
3. Future small gas utility franchise annual compliance filings shall provide customer counts reflecting the number of persons or businesses served (i.e. customers) rather than a customer count based on the number of meters.

Given these clarifications,

- B.1 Please verify that the updated customer counts in the 2025 compliance filings for the entities list based on the number of customers or the number of meters?

Response:

We have always used customer counts when reporting.

To be completed by responder

Response Date: 03/25/26

Response by: Cheri Landsteiner

Email Address: cheri@nwnogas.com

Phone Number: 507-524-4103



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G999/PR-25-15

Requested From: Rachel Sorrentino, Paul Bunyan Natural Gas

Type of Inquiry: General

Nonpublic Public

Date of Request: 3/19/2026

Response Due: 3/30/2026

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): John Kundert

Email Address(es): john.kundert@state.mn.us

Phone Number(s): 651-600-1182

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 5

Topic: Cold Weather Rule Communication Method and Policies relating to Budget Billing, Payment Arrangements and Under-Charge Payments

Reference(s): February 24, 2026, compliance filing in Docket No. G999/PR-25-15

Request:

1. In its Order dated November 9, 2021, at Order Points 3.D and 3.F, the Minnesota Public Utilities Commission required exempt small gas utilities to provide the following information in their respective annual compliance report.
 - D. A copy of the cold weather disconnection notice sent to customers, including how the notice was communicated and date communicated (Minn. Stat. § 216B.096, Minnesota's Cold Weather Rule).
 - F. A copy of its notice form sent to customers who are in arrears pursuant to the utility's obligation under Minn. Stat. § 216B.098 – Minnesota's Residential Customer Protections, along with any policy not clearly identified in the tariffs regarding budget billing plans, payment arrangements, and under-charge repayment.
- a) Beginning with Order Point 3.D, the Company provided almost all the information required except for the method of communication to customers regarding the CWR. Does Paul Bunyan Natural Gas use the United States Postal Service to deliver this information, or does it also use different method of communication like email or both?
- b) Does the Company have any policies that are not clearly identified in the tariffs regarding budget billing plans, payment arrangements, and under-charge payments?

To be completed by responder

Response Date: 03/25/2026

Response by: Cheri Landsteiner

Email Address: cheri@nwn gas.com

Phone Number: 507-524-4103



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G999/PR-25-15

Requested From: Rachel Sorrentino, Paul Bunyan Natural Gas

Type of Inquiry: General

Nonpublic Public

Date of Request: 3/19/2026

Response Due: 3/30/2026

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): John Kundert

Email Address(es): john.kundert@state.mn.us

Phone Number(s): 651-600-1182

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Response: We utilize the USPS for new customer packets, monthly bills and Notice of Proposed Disconnection and the Cold Weather Rule. We also include a copy for those who are paperless statements.

PAYMENT ARRANGEMENTS In compliance with Minn. Stat 216B.098, the Company shall offer payment arrangements for the payment of arrears and undercharges. Payment arrangements will consider a customer's financial circumstances and any extenuating circumstances of the household. No additional service deposit will be charged as a consideration to continue service to a customer who has entered and is reasonably on time under an accepted payment arrangement.

The Company shall offer a payment agreement to customers who have been undercharged if no culpable conduct by the customer or resident of the customer's household caused the undercharge. The agreement will cover a period equal to the time over which the undercharge occurred or a different time that is mutually agreeable to the customer and the Company. No interest or delinquency fee will be charged as part of an undercharge agreement under this section.

BUDGET BILLING PLAN Our Budget Plan is a 12-month program in which you Budget Plan payments begin in August and runs through the following July. Each following year, your August bill will be adjusted to your new budget payment amount. If your account was previously on the Budget Plan and has a balance remaining (either owing or credit), your new budget amount will be increased or decreased accordingly.

Paul Bunyan Natural Gas calculates your budget plan amount based on the past consumption of natural gas, projected natural gas prices and normal weather conditions. By averaging your natural gas payments over several months, the Budget Plan helps you avoid the payment peaks caused by cold winter weather. Customers with up-to-date accounts are eligible to enroll in the Budget Plan. If joining after the August start of the program, payment amounts will be prorated over the remaining months of the program year. Periodically we will review your payment amount and make necessary changes based on current weather and natural gas price. Payments are due in full each month by the due date. If the account is two months behind in payments, the account will be removed from the plan. The customer has the option to cancel the plan at any time. Upon cancellation the Budget Plan balance will be applied to your account.

To be completed by responder

Response Date: 03/25/2026

Response by: Cheri Landsteiner

Email Address: cheri@nwnrgas.com

Phone Number: 507-524-4103



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G999/PR-25-15

Requested From: Rachel Sorrentino, Paul Bunyan Natural Gas

Type of Inquiry: General

Nonpublic Public

Date of Request: 3/19/2026

Response Due: 3/30/2026

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): John Kundert

Email Address(es): john.kundert@state.mn.us

Phone Number(s): 651-600-1182

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number:	##
Topic:	Updated Customer Counts for Paul Bunyan Natural Gas
Reference(s):	February 24, 2026 compliance filing in Docket Nos. G999/PR-25-15

Request:

2. In its Order dated September 7, 2021, at Order Point 3, the Minnesota Public Utilities Commission clarified the updated customer count reporting requirement it had included in its previous Order dated November 9, 2018 regarding these dockets.
3. Future small gas utility franchise annual compliance filings shall provide customer counts reflecting the number of persons or businesses served (i.e. customers) rather than a customer count based on the number of meters.

Given these clarifications,

- a) Please verify that the updated customer counts in the 2025 compliance filings for the entities list based on the number of customers or the number of meters?

Response:

We have always reported the number of customers.

To be completed by responder

Response Date: 03/25/2026

Response by: Cheri Landsteiner

Email Address: cheri@nwingas.com

Phone Number: 507-524-4103

- A. Number of meters
- B.

Customer Type	Total Number of Customers
Projections	
<u>Courtland</u>	-
Residential	193
Large Commercial	5
Small Commercial	32
Interruptible	0
<u>Lafayette</u>	-
Residential	140
Large Commercial	3
Small Commercial	24
Interruptible	1
<u>Non Municipality (Incidental)</u>	-
Residential	104
Large Commercial	33
Small Commercial	5
Interruptible	23
Total Customers on Project	563

1. Dooley's I LLC & Dooley's II LLC (Docket Nos. G6915/M-13-672 and G6915/M-16-756)																		
		Calendar Year					Annual Nominal Change					Annual Percentage Change					% Change	% Ann. Avg.
Customer Class		2020	2021	2022	2023	2024	20-21	21-22	22-23	23-24	2020-2021	2021-2022	2022-2023	2023-2024	2020-2024	2020-2024		
Total		1,909	1,911	1,925	1,935	1,939	2	14	10	4	0.1%	0.7%	0.5%	0.2%	1.8%	0.4%		
2. Lake Region Energy Services (Docket Nos. G6977/M-17-186 and G6977/M-17-829)																		
		Calendar Year					Annual Nominal Change					Annual Percentage Change					% Change	% Ann. Avg.
Customer Class		2020	2021	2022	2023	2024	20-21	21-22	22-23	23-24	2020-2021	2021-2022	2022-2023	2023-2024	2020-2024	2020-2024		
Total		781	1,017	1,139	1,177	1,116	236	122	38	(61)	30.2%	12.0%	3.3%	-5.2%	42.9%	10.7%		
3. Lakes Community Coops (Docket No. G6956/M-15-856)																		
		Calendar Year					Annual Nominal Change					Annual Percentage Change					% Change	% Ann. Avg.
Customer Class		2020	2021	2022	2023	2024	20-21	21-22	22-23	23-24	2020-2021	2021-2022	2022-2023	2023-2024	2020-2024	2020-2024		
Total		1,029	1,123	1,101	1,320	1,363	94	-22	219	43	9.1%	-2.0%	21.3%	3.8%	32.5%	8.1%		
4. Northwest Utilities (Docket No. G6278, G6279, G6280/CI-18-770)																		
		Calendar Year					Annual Nominal Change					Annual Percentage Change					% Change	% Ann. Avg.
Customer Class		2020	2021	2022	2023	2024	20-21	21-22	22-23	23-24	2020-2021	2021-2022	2022-2023	2023-2024	2020-2024	2020-2024		
Total		4,805	4,971	4,968	4,995	4,958	166	(3)	27	(37)	3.5%	-0.1%	0.5%	-0.7%	3.2%	0.8%		
5. Paul Bunyan LLC (Docket No, G7066/EX-21-693)																		
		Calendar Year					Annual Nominal Change					Annual Percentage Change					% Change	% Ann. Avg.
Customer Class		2020	2021	2022	2023	2024	20-21	21-22	22-23	23-24	2020-2021	2021-2022	2022-2023	2023-2024	2020-2024	2020-2024		
Total		0	0	574	645	667	0	574	71	22	NA	NA	12%	3%	16.2%	8.1%		
6. United Natural Gas (Docket No. G6960/M-16-214)																		
		Calendar Year					Annual Nominal Change					Annual Percentage Change					% Change	% Ann. Avg.
Customer Class		2020	2021	2022	2023	2024	20-21	21-22	22-23	23-24	2020-2021	2021-2022	2022-2023	2023-2024	2020-2024	2020-2024		
Total		516	527	539	555	563	11	12	16	8	2.1%	2.3%	3.0%	1.4%	9.1%	2.3%		
7. Total Number of ESGU Customers by Year																		
		Calendar Year					Annual Nominal Change					Annual Percentage Change					% Change	% Ann. Avg.
Customer Class		2020	2021	2022	2023	2024	20-21	21-22	22-23	23-24	2020-2021	2021-2022	2022-2023	2023-2024	2020-2024	2020-2024		
Total		10,069	10,672	11,347	11,947	11,959	603	675	600	12	6.0%	6.3%	5.3%	0.1%	18.8%	4.7%		

Attachments

Title	Description	Topic
1	IR 1/Dooley's Natural Gas response	Reporting Requirements
2	IR 2/Lakes Community response	Reporting Requirements
3	IR 3/LRES response	Reporting Requirements
4	IR 6/Northwest Utilities response	Reporting Requirements
5	IR 5/Paul Bunyan Natural Gas	Reporting Requirements
6	IR 4/United Natural Gas	Reporting Requirements
7	ESGU Customer Growth 2020-2024	Analysis

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of people 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. G999/PR-25-15

Dated this 15th day of **April 2026**

/s/Sharon Ferguson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	County	Administrator		Nicollet County Administrator		501 S Minnesota Ave St Peter MN, 56082 United States	Paper Service		No	Official 25-15
2	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	Official 25-15
3	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-15
4	David	Blomseth	davidb@communitycoops.com	Lakes Community Coop		PO Box 329 14583 Hwy 10 W Lake Park MN, 56554 United States	Electronic Service		No	Official 25-15
5	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-15
6	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	Official 25-15
7	Joel	Dahlgren	joel.dahlgren@ufcmn.com	United Farmers Cooperative		PO Box 461 Winthrop MN, 55396 United States	Electronic Service		No	Official 25-15
8	Randy	Dooley	rdooley@dooleypetro.com	Dooley's Natural Gas, LLC		3101 3rd Ave SW Willmar MN, 56201 United States	Electronic Service		No	Official 25-15
9	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	Official 25-15
10	Ryan D	Fullerton	r.fullerton@pemplaw.com	Pemberton, Sorlie, Rufer & Kershner		110 North Mill St Fergus Falls MN, 56537 United States	Electronic Service		No	Official 25-15
11	Mike	Gorham	mike@nwgas.com	Gorham's Inc dba Northwest Gas		1608 NW 4th St Grand Rapids MN, 55744 United States	Electronic Service		No	Official 25-15
12	Jessica	Halvorson	jhalvor@arvig.net	Wambach & Hanson Law Office, P.C.		PO Box 340 Mahnomen MN, 56557 United States	Electronic Service		No	Official 25-15
13	Elroy E.	Hanson	ehanson@arvig.net	Wambach & Hanson Law Office PC		304 N Main St PO Box 340 Mahnomen MN, 56557 United States	Electronic Service		No	Official 25-15
14	Ashley	Harrison	ashley.harrison@llojbwe.net	Leech Lake Band of Ojibwe		190 Sailstar Dr NW Cass Lake MN, 56633 United States	Electronic Service		No	Official 25-15

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
15	Gregory	Hauptert	ghauptert@parthenonagency.com	Sobalvarro & Hauptert		3601 18th St. S. Ste 105 St. Cloud MN, 56301 United States	Electronic Service		No	Official 25-15
16	Steven C	Jones	cityadmin@hcinet.net	City of Clara City		215 First St NW PO Box 560 Clara City MN, 56222 United States	Electronic Service		No	Official 25-15
17	Clark	Kaml	clark.kaml@gmail.com	CDK Consulting, LLC		2624 Mistwood Court Grand Forks ND, 58201 United States	Electronic Service		No	Official 25-15
18	Tony	Kammerlander	tony.kammerlander@ufcmn.com	United Natural Gas		PO Box 461 Winthrop MN, 55396 United States	Electronic Service		No	Official 25-15
19	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	Official 25-15
20	Cheryl	Landsteiner	cheri@nwgas.com	Northwest Natural Gas LLC		314 Main St NE PO Box 721 Mapleton MN, 56065 United States	Electronic Service		No	Official 25-15
21	Robert L	Larsen	robert.larsen@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	Official 25-15
22	Bruce	Nelson	tbnelson@loretel.net	Lakes Community Coop		PO Box 329 14583 Hwy 10 W Lake Park MN, 56554 United States	Electronic Service		No	Official 25-15
23	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	Official 25-15
24	Brian	Pendleton				PO Box 308 39527 Reservation Hwy 1 Morton MN, 56270 United States	Paper Service		No	Official 25-15
25	Al	Poehler	ctclerk@comcast.net	City of Courtland		300 Railroad St Courtland MN, 56021 United States	Electronic Service		No	Official 25-15
26	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	Official 25-15
27	Darren	Saffert	lafcityclerk@gmail.com	City of Lafayette		700 Ninth St PO BOX 375	Electronic Service		No	Official 25-15

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Lafayette MN, 56054 United States				
28	Nizhoni	Smith	nizhoni.smith@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	Official 25-15
29	Rachel	Sorrentino	rachel@nwgas.com	Northwest Gas		801 Twelve Oaks Center Dr Ste 815B Wayzata MN, 55391 United States	Electronic Service		No	Official 25-15
30	J. Richard	Stermer	rstermer@stermerlaw.com	Stermer & Sellner, Chtd.		102 Parkway Drive P.O. Box 514 Montevideo MN, 56265 United States	Electronic Service		No	Official 25-15
31	Tim	Thompson	tthompson@lrec.coop	Lake Region Electric Cooperative		PO Box 643 1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	Official 25-15