



1900 Cardinal Lane  
Faribault, MN 55021  
Toll Free: (888) 931-3411  
Fax (507) 665-2588  
[www.greatermngas.com](http://www.greatermngas.com)

April 25, 2025

**VIA ELECTRONIC FILING**

Mr. Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, Minnesota 55101-2147

Re: Letter in Lieu of Comments  
Monthly Residential Customer Status Reports  
Docket No. G022/M-25-02

Dear Mr. Seuffert:

Greater Minnesota Gas, Inc. (GMG) respectfully submits this Letter in Lieu of Comments in above-referenced docket.

As noted in GMG's previous letter accompanying its filings in this docket, GMG acknowledges that it did not timely file its weekly and monthly reports in Dockets 24-02 and 25-02 and that the reports were seriously delinquent. While not making excuses for its filing deficiencies, GMG did attempt to provide a high-level explanation of circumstances that contributed to the late filings. Regardless of the cause of GMG's nonperformance, the fact that it occurred cannot be changed, GMG accepts responsibility for it, and the delinquent reports have been submitted. GMG apologizes for its compliance failure and any inconvenience caused by it.

GMG has instituted new procedures for gathering and maintaining the underlying report data, report preparation, and filing moving forward in an effort to assure timely compliance in the future. Responsibility for preparing the report data previously fell on one person and GMG has involved more people and established preparation, filing, and tracking practices for the reports. Two members of the customer service team have been tasked with extracting and compiling the data that feeds into the reports, and with preparing the report. Those two individuals handle GMG's energy assistance, accounts receivable, payment arrangements, disconnection determinations, and community action agency relationships. Both of those individuals, as well as their immediate team lead, have been specifically retrained in all aspects of the reporting requirements and how to acquire and maintain the necessary data. Training emphasized ensuring that the data is correct, that there is continuity across the data reported, completeness, timeliness, and compliance with the related rules and regulations. The importance of thinking about the data from a broad perspective was highlighted, such that the individuals were encouraged to not just rely on the information generated from a report but to also look at the report results and compare them to other known information such as disconnection records, financial data, information

discussed in periodic meetings regarding related data, etc., to also provide a common-sense consideration of report accuracy and completeness.

Those individuals, working together and with the oversight of their team lead, will provide the completed reports, including access to all of the supporting data, to two people on GMG's leadership team (their group manager and the corporate attorney) by a monthly deadline that allows one week for review of the reports and any necessary changes to be made. That five-person team constitutes approximately 1/3 of GMG's total daily in-office personnel. The monthly deadlines have been pre-populated on the electronic calendars of all five individuals so that, if the report and data have not been made available, the rest of the team is alerted and can remedy it. Thereafter, the individual responsible for filing the report in edockets will provide confirmation to the rest of the five-person team that the report has been filed on or before the morning that the report is due, which provides an electronic alert that the filing task has been completed. If such confirmation has not been provided by mid-day, all other members of the five-person group have been charged with inquiring and intervening to assure that the report is filed before the end of the day that it is due.

GMG believes that having multiple individuals involved in acquiring and maintaining the underlying data as well as responsibility for report preparation will provide internal accountability and depth of knowledge. Additionally, by assigning that responsibility to individuals who handle related areas of the business, the information is more meaningful to them and it will be more likely to be noticed by them if something appears to be off about the data, since they work with and report on data in related areas in various other aspects of their jobs. Similarly, having three levels of personnel involved in the preparing, reviewing, filing, and confirming filing of the reports provides safeguards at multiple stages in the process. GMG is confident that its internal changes will assure compliance in the future.

Thank you for your assistance. Please do not hesitate to contact me should you have any questions or concerns or if you require additional information. My direct dial number is (507) 209-2110 and my email address is [kanderson@greatermngas.com](mailto:kanderson@greatermngas.com).

Sincerely,

GREATER MINNESOTA GAS, INC.

/s/

Kristine A. Anderson  
Corporate Attorney