

October 2, 2025

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

RE: Comments of the Minnesota Department of Commerce
Docket No. G004/M-25-71

Dear Ms. Bergman:

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

Demand Entitlement Filing.

The Petition was filed by Great Plains Natural Gas Company on July 1, 2025.

The Department **requests additional information and clarification regarding Great Plains Natural Gas' Proposed Overall Demand Entitlement Quantities and Rates** as described herein and will provide its final recommendations to the Minnesota Public Utilities Commission (Commission) after Great Plains Natural Gas files its Reply Comments and Supplemental Informational Filing. The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

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

AU/JK/ad
Attachment



COMMERCE DEPARTMENT

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. G004/M-25-71

I. INTRODUCTION

The Minnesota Department of Commerce, Division of Energy Resources (Department) provides its comments on the Demand Entitlement Filing (Petition) of Great Plains Natural Gas Company (GP, Great Plains, or the Company) in Docket No. G004/M-25-71.¹ Pursuant to Minn. R. 7825.2910, Subp. 2,² Great Plains filed a petition on July 1, 2025, with the Minnesota Public Utilities Commission (Commission) requesting no changes in the overall levels of demand³ for natural gas pipeline capacity.

The Department provides its initial recommendations below and will provide its final recommendations upon review of the Company's Reply Comments and Supplemental Informational Filing.⁴

II. PROCEDURAL BACKGROUND

July 1, 2025 GP submitted its Petition requesting a change in its 2025-2026 Demand Entitlement.

Minn. R. 7825.2910, Subp. 2 requires a natural gas utility to file a petition requesting a change in demand.⁵

¹ *In the Matter of Great Plains Natural Gas Company's Demand Entitlement Filing*, Great Plains Natural Gas Company, Demand Entitlement Filing, July 1, 2025, Docket No. G004/M-25-71, (eDocket No. [20257-220585-01](#)) (hereinafter "Petition").

² Minn. R. 7825.2910, Subp. 2: "Filing upon a change in demand. Gas utilities shall file for a change in demand to increase or decrease demand, to redistribute demand percentages among classes, or to exchange one form of demand for another."

³ Also called entitlement, capacity, or transportation on the pipeline.

⁴ All four of the rate-regulated natural gas distribution utilities make a filing like Great Plains Supplemental Informational Filing during this period. The filing includes information related to NNG's TF Base and TF Variable Allocation, the Company's final proposed rates and the rate impacts of those rates on an average customer in several of the Company's firm sales customer classes.

⁵ [Minn. R. 7825.2910, Subp. 2](#): “Filing upon a change in demand. Gas utilities shall file for a change in demand to increase or decrease demand, to redistribute demand percentages among classes, or to exchange one form of demand for another.”

III. DEPARTMENT ANALYSIS

A. SUMMARY

Great Plains' proposal relative to its demand for pipeline capacity to serve its Minnesota-jurisdictional customers is to increase its design day estimated demand by 214 Dekatherms (Dth or Dk) per day from 31,678 Dth/day⁶ to 31,892 Dth/day.⁷

The Company is not proposing to terminate any existing contracts with either of the two interstate pipelines that has existing contracts with, those being Northern Natural Gas Interstate Pipeline (Northern or NNG) and Viking Gas Transmission Company (Viking or VGT).⁸ Great Plains' proposal relative to its contracted supply of firm pipeline capacity is to maintain the current amount of 34,436 Dth/day.⁹

Great Plains is also requesting that the Commission accept the Company's proposal to release the capacity for 8,000 Dekatherm (Dth) on Viking for the duration of the winter heating season.¹⁰ Approval of this proposed capacity release on VGT would result in GPNG incorporating this decrease in available winter season capacity on Viking thereby constraining the Company's ability to serve firm customers who receive delivery from the Viking pipeline. The Department also notes that the Company's proposed winter season firm capacity for GPNG's service area served by VGT for the 2025-2026 heating season is identical to the firm winter season pipeline capacity GPNG purchased for the 2024-2025 heating season.¹¹

The Company's initial estimate of the proposed changes in its supply-side resources will result in total demand costs from all source systems of approximately \$6,642,117.¹² This represents an increase of \$518,461/year from the July 2024 Purchased Gas Adjustment (PGA) filing.¹³ On a percentage basis, Great Plains estimates it will increase a residential customer's annual bill 8.7% and a commercial customer's annual bill 9.3%.¹⁴

The Company's initial estimate of its overall 2025-2026 heating season reserve margin is 7.98%.¹⁵

⁶ Petition Exhibit B at 1.

⁷ The Company provided a revised design-day requirement of 31,892 Dth/day in the Petition at 1 and Exhibit A.

⁸ Great Plains also contracts with NNG for interstate pipeline services. For the area of the Company's system that was previously known as the South District, Great Plains proposed no changes to its overall NNG capacity.

⁹ Petition Exhibit B.

¹⁰ Great Plains has made similar proposals for the past several years and the Commission has approved them.

¹¹ Petition, Exhibit B.

¹² Petition Table 1 at 4.

¹³ *In the Matter of the 2024 Monthly PGA and Energy Cost Adjustment*, Great Plains Natural Gas Company, Purchased Gas Cost Adjustment (PGA) July 2024, June 27, 2024, Docket No. G004/AA-24-61, ([eDocket No. 20246-208007-01](#)).

¹⁴ Great Plains estimated that its proposal would cause an increase in rates of \$0.7505/Dth, which results in an increase for residential customers of approximately \$60.94 per year, assuming an annual usage of 81.2 Dth, and an increase for firm general service customers of approximately \$327.22 per year, assuming an annual usage of 436 Dth. See Petition Exhibit C.

¹⁵ Petition at 3 and Exhibit A.

Great Plains requested that the Commission allow recovery of the associated demand costs in the Company's monthly PGA effective November 1, 2025.

The Department's analysis of the Company's request includes the following areas:

- The proposed demand entitlement level;
- The design-day requirement, including a discussion of GP's efforts to recognize the effects of electrification/decarbonization into its design-day estimate and sales forecast;
- Great Plain's proposed reserve margin;
- The Company's PGA cost recovery proposal; and
- Compliance with reporting requirements in previous commission orders concerning the Company's annual demand entitlement filing.

B. PROPOSED DEMAND ENTITLEMENT LEVEL

As noted previously, Great Plains contracts for firm capacity for its sales customers with two interstate pipelines to transport the natural gas it purchases on its customers' behalf to those same customers – Northern and Viking.

B.1. Firm Pipeline Capacity - Current Agreements

B.1.1 Northern Natural Gas

Regarding NNG capacity, Great Plains stated in its initial filing, as it has in prior years, that NNG's reallocation of TF12 base and TF12 variable services is not known until the November update and that the changes are typically not significant.¹⁶ The reallocation changes are in accordance with NNG's tariff approved by the Federal Energy Regulatory Commission (FERC).¹⁷ According to information Great Plains provided in prior demand entitlement dockets, there is no deliverability difference between TF12 base and TF12 variable services, as both are firm throughput services, but TF12 base service is less expensive than TF12 variable service. Great Plains will provide this update in the Supplemental Informational Filing which the Company submits at the end of October or in the first few days of November (Informational Update).

B.1.2 Viking Gas Transmission Company

Great Plains' current agreements with Viking are:

- Two 5-year FT-A annual contracts for 8,000 and 5,000 dekatherms respectively that will expire on October 31, 2027.¹⁸

¹⁶ Petition at 4.

¹⁷ Under its Federal Energy Regulatory Commission (FERC) approved tariff, NNG is allowed to adjust a utility's assigned level of contracted capacity based on the utility's usage of its NNG-based capacity over the previous five-month period (May through September).

¹⁸ Petition Exhibit B.

- A 5-year FT-A seasonal contract for 2,000 Dth/day that will also expire October 31, 2027.¹⁹
- A 5-year FT-A annual contract with VGT for 5,000 Dth/day effective November 1, 2018.²⁰
 - The Company extended that contract which will expire on October 31, 2028.
- A 10-year FT-A annual contract with VGT for 3,291 Dth/day effective November 1, 2022, which will expire on October 31, 2032.²¹
- Great Plains intends to release the combined excess VGT FT-A capacity of 8,000 Dth/day for the 2025-2026 heating season.²²

B.2 Proposed Quantity Changes

Table 1 below provides a comparison of the Company's current and proposed overall level of entitlements.

Table 1: A Comparison of Great Plains' Current and Proposed Entitlements

Pipeline	Current Entitlement (Dth/day)	Proposed Entitlement (Dth/day)	Change (Dth/day)	Percent Change
VGT	15,291	15,291	0	0.00%
NNG	19,145	19,145	0	0.00%
Total	34,436	34,436	0	0.00%

As indicated in Table 1 and in Department Exhibit 1, the Company's proposal would result in no changes to the overall demand entitlement level for the 2025-2026 winter season when compared to the 2024-2025 winter season.

C. DESIGN-DAY REQUIREMENT

As indicated in Table 2 below and Department Exhibit 2, the Company proposed to increase its total design day demand estimate in Dth as follows:

¹⁹ *Id.*

²⁰ *In the Matter of Great Plains Natural Gas Co., a Division of MDU Resources Group Inc.'s (Great Plains) Demand Entitlement Filing*, Great Plains Natural Gas Company, Informational Update Filing, October 31, 2018, Docket No. G004/M-18-454, (eDocket No. [201810-147475-01](#)).

²¹ *In the matter of Great Plains Natural Gas Co. 2022-2023 Heating Season Demand Entitlement Filing*, Great Plains Natural Gas Company, Demand Entitlement Filing, June 30, 2022, Docket No. G004/M-22-310, (eDocket No. [20226-187089-01](#).)

²² Petition at 3.

Table 2: Great Plains' Design-Day Levels²³

Pipeline & Area	Previous Design-day (Dth/day)	Proposed Design-day (Dth/day)	Change (Dth/day)	Percent Change
Crookston	3,769	3,836	67	1.78%
North-4	10,260	10,373	113	1.10%
Total Viking	14,029	14,209	180	2.88%
South District				
Total NNG	17,649	17,683	34	0.19%
Grand Total	31,678	31,892	214	3.07%

As shown on Petition Exhibit A, Great Plains calculated a projected design-day requirement of 31,892 Dth/day. This projection consists of 14,029 Dth/day for firm customers receiving natural gas from city gates interconnecting with VGT and 17,683 Dth/day for those firm customers receiving natural gas from city gates interconnecting with NNG.

C.1 Regression Analysis

The Company used the same basic design-day method in this docket that the Commission has accepted in Great Plains' demand entitlement dockets since Docket No. G004/M-03-303. In previous demand entitlement proceedings, the Department and Commission Staff expressed concerns that Great Plains' design-day method might under-estimate the need for natural gas on a peak day for the South District and the North District.²⁴ In response to these concerns, the Commission ordered the Company and the Department to work cooperatively on developing a design-day analysis that would address the concerns raised by the Department.²⁵ Subsequently, Great Plains submitted a Compliance Filing on June 27, 2012 in Docket No. G004/M-10-1164. In that Compliance Filing, Great Plains provided additional discussion and analysis regarding its design-day method using different scenarios (i.e., as filed 36 months, 36 winter months only, 60 winter months only) as requested by the Department. The Department concluded that, "As noted above, despite these concerns, the Department believes that the Company's design-day analysis does not appear to produce unreasonable results."²⁶ The Commission agreed with the Department's conclusion that, while concerns about sample size and

²³ The Department created the table from data provided in the demand entitlement filing for Petition Exhibit A.

²⁴ The Department's concerns on this issue are discussed in detail in the following documents:

- the Department's July 2, 2008 Comments in Docket No. G004/M-07-1401, (eDocket No. [5317726](#));
- the Department's July 31, 2009 Comments in Docket No. G004/M-08-1306 (eDocket No. [20097-40360-01](#)); and
- the Department's February 5, 2010 Comments in Docket No. G004/M-09-1262 (eDocket No. [20102-46847-01](#)). Commission Staff's concerns are discussed in detail in their September 9, 2010 Briefing Papers (eDocket No. [20109-54247-03](#)), which were contemporaneously submitted in each of these three dockets.

²⁵ See Ordering Paragraph No. 2 of the Commission's September 30, 2010 Order in Docket Nos. G004/M-07-1401, G004/M-08-1306, and G004/M-09-1262 (eDocket No. [20109-55024-02](#)).

²⁶ The Department's concerns on this issue are discussed in detail in the following documents: The Department's March 18, 2013 Comments in Docket No. G004/M-12-740 (eDocket No. [20133-84795-01](#)) and the Department's August 19, 2013 Comments in Docket No. G004/M-13-566 (eDocket No. [20138-90392-01](#)).

changing weather patterns still exist, the Company's design-day methodology was acceptable because its results were not unreasonable.

The Commission's June 8, 2017, Order in Docket No. G004/M-16-557 stated the following: "Required Great Plains, in its future demand entitlement filings, to check the regression models it ultimately uses for autocorrelation, and correct the models if autocorrelation is present."²⁷

In its Petition, Great Plains stated the following:

Great Plains has a long history of successfully serving its customers gas requirements in a safe, reliable, and economical fashion. The Company believes its regressions are accurate, can be relied upon for forecasting demand requirements, and the resulting design day peak capacity requirements are not unreasonable. Great Plains serves approximately 22,400 Minnesota customers and is intimately familiar with its customer's gas usage, conservation, and growth characteristics.

...Great Plains continues to monitor its data and regression models for the presence of autocorrelation and whether it has statistical significance to the projected design day requirement, as agreed to in Docket No. G004/M-17-521. While studies indicate autocorrelation is present, its effects are immaterial and Great Plains continues to support its current methodology, previously approved, as the modeling produces reasonable results.²⁸

The Department appreciates Great Plains' discussion of autocorrelation described above. The Department has previously discussed the issue of autocorrelation and its potential impact and will not repeat that discussion here.²⁹

As noted above, Great Plains partially complied with the Commission's June 8, 2017, Order by checking its models for autocorrelation. However, Great Plains did not correct the models for autocorrelation.

The Department corrected the models for autocorrelation and makes the following observations:

- Great Plains' projected design-day is 31,892 Dth/day. After correcting for autocorrelation, the projected design-day changed to 31,254 Dth/day, or approximately by -638 Dth, which is a -2% change.³⁰

²⁷ *In the Matter of Great Plains Natural Gas Company's 2016-2017 Winter Heating Season Demand*, Minnesota Public Utilities Commission, Order, June 8, 2017, Docket No. G004/M-16-557, (eDocket No. [20176-132654-01](#)), at 1 (hereinafter "June 8, 2017 Order").

²⁸ Petition at 1-2.

²⁹ See the Department's August 27, 2015 Comments in Docket No. G004/M-15-645 at 4-5 (eDocket No. [20158-113575-01](#)), November 10, 2016 Response Comments in Docket No. G004/M-16-557 at 8 (eDocket No. [201611-126436-01](#)), and the Department's November 29, 2017 Comments in Docket No. G004/M-17-521 at 4-8 (eDocket No. [201711-137776-01](#)).

³⁰ Attachment DOC-1 includes the Company's response to DOC Information Request (IR) No. 17.

- Great Plains must plan for its design-day.
- Interstate pipeline capacity contracts are usually subscribed to for relatively long durations, for example 10 years. Great Plains signed a 10-year contract with NNG for an annual TFX service, and with VGT for an annual FT-A service, as discussed in greater detail below.
- Capacity is usually added in larger “chunks” and for example, not specifically to account for the -638 Dth entitlement difference.
- The Company’s reserve margin will help to address the -638 Dth entitlement difference.

In addition, Great Plains has previously agreed to continue monitoring its data and models for autocorrelation. The Department appreciates Great Plains’ prior agreement to monitor its data and models. As a result, based on all the above information, the Department concludes that Great Plains’ models can be used by Great Plains in planning for its design day.

Consistent with prior analyses presented by the Department in Docket Nos. G004/M-11-1075, G004/M-12-740, and G011/M-13-566, the Department used two methods to gauge the reasonableness of the Company’s design-day amounts for Great Plains’ consolidated system (previously known as the South District and the North District): 1) using data from the previous five heating seasons; and 2) using data from the heating season with the overall greatest peak send out per firm customer that occurred before the previous five heating seasons.³¹

C.1.1 Consolidated System (North and South District)

The Department multiplied the peak send out per firm customer for the 2024-2025 heating season of 1.3272 Dth, which is the highest peak send out per firm customer in the previous five heating seasons, by the expected number of firm customers for the 2025-2026 heating season of 22,439 to arrive at an estimated design-day amount of 29,781 Dth/day. This amount is 2,111 Dth/day less than the Company’s proposed design-day level of 31,892 Dth/day.

Thus, using the method based on the highest firm peak send out data for the previous five heating seasons, Great Plains appears to have a sufficient level of entitlements for the 2025-2026 heating season for its system.

In past demand entitlement filings, the South District’s 1995-1996 heating season represented the highest peak send out per firm customer in the previous 30 heating seasons. Whereas for the North District, the 1999-2000 heating season represented the highest peak send out per firm customer in the previous 30 heating seasons.

The Department also calculated an estimated design-day amount using data from the 1999-2000 heating season, which represents the highest peak send out per firm customer in the previous 30 heating seasons for Great Plains’ system. Specifically, the Department multiplied the peak send out per firm customer for the 1999-2000 heating season of 1.5322 Dth (historical North District number) by the

³¹ The data used by the Department is taken from Exhibit D of the Petition and prior demand entitlement filings.

expected number of firm customers for the 2025-2026 heating season of 22,439 to arrive at an estimated design-day amount of 34,381 Dth. This amount is 2,489 Dth more than the Company's proposed design-day level of 31,892 Dth/day.

Given the previous system configuration, the Department also calculated an estimated design-day amount using data from the 1995-1996 heating season, which represents the second highest peak send out per firm customer in the previous 30 heating seasons for Great Plains' system. Specifically, the Department multiplied the peak send out per firm customer for the 1995-1996 heating season of 1.5197 Dth (historical South District number) by the expected number of firm customers for the 2025-2026 heating season of 22,439 to arrive at an estimated design-day amount of 34,101 Dth. This amount is 2,209 Dth more than the Company's proposed design-day level of 31,892 Dth/day.

C.2 Reasonableness of GP's Design-Day Analysis

As noted above, when the all-time peak-day send out numbers are analyzed, it appears that Great Plains may not have sufficient capacity to serve firm customers on a Commission design-day. However, in its 2010 demand entitlement proceeding, Great Plains stated that the peak-day use-per-customer figures during past heating seasons are no longer appropriate metrics because of the many changes (e.g., the movement of firm customers to interruptible service, customer losses due to natural disasters, customer growth and losses, energy conservation) that have occurred since 1995, resulting in steadily declining use per customer. In that same proceeding, the Department observed that, in general, Great Plains' assertions about changes in use per customer over time appear to be plausible and should be reflected in estimates of use per customer.

During the 2020-2021 heating season, Great Plains' service territory experienced a cold weather event. Great Plains had a peak send out of 31,245 Dth, which was also below Great Plains' estimated design-day of 33,922 Dth.

During the 2018-2019 heating season, Great Plains' service territory experienced a cold weather event. Great Plains had a peak send out of 30,320 Dth that year, which was also below Great Plains' estimated design-day of 33,674 Dth. The extreme weather in the 2013-2014 heating season offers further insight in evaluating the Company's design-day estimate. Great Plains experienced an outage in January 2014 when the TransCanada pipeline, which supplied gas to the VGT exploded. Great Plains also experienced extremely cold weather during the months of January through March 2014. Despite these challenges, the peak send out during the 2013-2014 heating season of 27,693 Dth was below Great Plains' estimated design-day of 29,433 Dth.

In addition, Great Plains had the second highest peak send out in recent history of 30,686 Dth in the 2022-2023 heating season, which was also below Great Plains' estimated design-day of 35,159 Dth.

Based on all the above discussion, the Department recommends that the Commission accept the Company's same proposed design-day method for its system.

D. EFFECTS OF ELECTRIFICATION-DECARBONIZATION ON GREAT PLAINS 2025-2026 HEATING SEASON DESIGN DAY

During the Commission's review of CenterPoint Energy of Minnesota's (CenterPoint, CPE) 2024-2025 demand entitlement filing, (Docket No. G008/M-24-146) at a Commission Agenda meeting on June 17th, 2025 Commissioners asked CenterPoint Energy representatives and Department staff several questions related to the design day regression analyses and annual sales forecast used in that filing.³² Commissioner's questions focused on CenterPoint Energy's efforts to incorporate the effects of electrification and/or decarbonization efforts in its design day analysis, specifically on the design day regression analyses and the annual sales forecast.

In response to Commissioner's questions and concerns, the Department developed information requests that requested specific information regarding those two topics. The Department issued modified versions of those information requests to Great Plains in this docket to begin to collect information on this topic.³³ The Company responded to each of those information requests on August 21, 2025.

Information request 6 asked if the Company had incorporated any process for estimating the effects of electric heat pumps on its 2025-2026 design day estimates for the residential customer class. The Company responded:

Great Plains does not have a process in place to estimate the installations or effects of heat pumps or other electrification technologies for any class of customers. Therefore, Great Plains is not incorporating an analysis or adjustment for electrification technologies in its design day calculations. The main reason being that Great Plains has a small service territory mainly located in rural areas.

The Company has very low growth rate and has not seen any significant demand changes from customers relating to electrification.³⁴

Information request no. 7 asked a similar question regarding heat pump use for firm commercial customers. Information request no. 8's focus was on non-heat pump electrification technologies for residential customers. Information request no. 9 asked Great Plains about the effects of electrification technologies for firm commercial customers in its 2025-2026 design day calculations. Information request no. 10 focused on the impacts of electrification technologies on the firm industrial customer class in the Company's 2025-2026 design day analysis. Information request 11 asked if the Company had incorporated any process for estimating the effects of electric heat pumps on its 2025-2026 forecasted monthly sales for the residential customer class. Information request no. 12 asked a similar question regarding non-heat pump use for residential customers on the sales forecast. IR 13's focus was on electrification technologies for firm commercial customers on the sales forecast. IR 14 asked

³² [Webcast](#), PUC Agenda Meeting, at 2:58-8:40, June 17, 2024.

³³ The Department issued IRs 1 through 18 on August 11, 2025. IRs 6 through 16 were related to this question.

³⁴ Attachment DOC-2 includes the Company's response to DOC Information Request No. 6.

Great Plains about the effects of electrification technologies for firm industrial customers on its 2025-2026 sales forecast. IR 15 asked if Great Plains had analyzed statistical approaches other than its existing regression models that would allow Great Plains to incorporate the effects of electrification technologies on its annual forecasted design day and forecasted monthly sales.

The Company's response to information requests nos. 7 through 15 all referred to the response to information request no. 6.³⁵ No additional detail was provided in each individual response.

IR 16 asked about agreements with electric utilities to share interstate pipeline capacity during extreme weather events. Specifically, the Department asked if the Company had identified any electric utilities in Minnesota with whom it would be beneficial to share interstate pipeline capacity during extreme weather events and whether Great Plains had initiated conversations with those electric utilities.

Great Plains' response notes it has not identified any such utilities and has not engaged in such discussions.³⁶

The Department's review of the potential effects of electrification/decarbonization relative to GPNG's 2025-2026 design day suggests that no adjustment to decrease the Company's estimate should be made given the information the Company has provided. The Department has no additional comments or recommendation regarding this topic. As Department notes that these issues could be addressed in either the Commission's Gas Integrated Resource Plan proceedings (Docket No. G008, G002, G011/CI-23-117), or the Commission's Investigation into the Future of Gas (Docket No. G999/CI-21-565).

E. PROPOSED RESERVE MARGIN

Reserve margin is defined as the percentage by which the Company's demand entitlement exceeds its forecasted design day. Table 4 provides the reserve margin calculation for 2019 through 2026.

Table 4: Great Plains' Reserve Margin 2019 through 2026 (Percent)

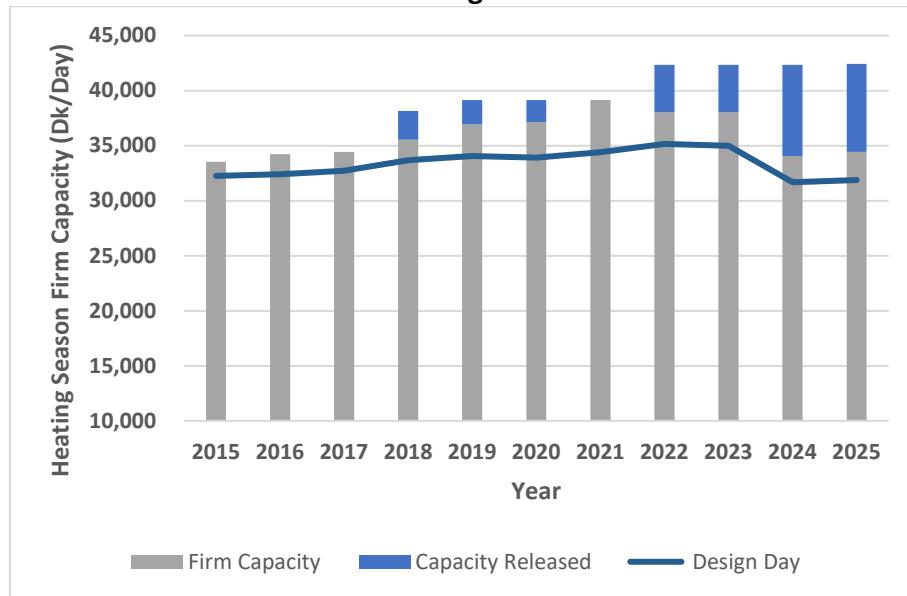
Heating Season	Design Day (Dth/day) (a)	Total Entitlement (Dth/day) (b)	Reserve Margin (c) = (b-a)/a
2019-2020	34,066	36,945	8.45%
2020-2021	33,922	37,145	9.50%
2021-2022	34,398	39,145	13.80%
2022-2023	35,159	38,145	8.49%
2023-2024	34,975	38,145	9.03%
2024-2025	31,678	34,145	7.79%
2025-2026	31,892	34,436	7.98%

³⁵ Attachment DOC-3 includes the Company's responses to IRs Nos. 7 through 15.

³⁶ Attachment DOC-4 includes the Company's response to DOC IR No. 16.

The Department begins its review of the proposed demand entitlements for the 2025-2026 heating season with a comparison of the historical forecasted demand (design day) and overall demand entitlements (supply). Hence, Chart 1 illustrates the relationship between Great Plains' heating season firm capacity, capacity release, and design-day since 2015.

Chart 1 – Heating Season Firm Capacity, Capacity Release and Design Day 2015-2016 through 2025-2026 Heating Seasons³⁷



As shown on Petition Exhibit A, Great Plain's design day estimate for the 2025-2026 heating season is 31,892 Dk/day. That design day estimate is consistent with the 2024 – 2025 heating season, which was lower than every annual design day estimate since the 2015 – 2016 heating season. The transfer of the Wahpeton load from Great Plains to Montana-Dakota Utilities in the 2024 – 2025 season caused a significant decrease in Great Plains' design day.

The Company's strategy for supply since 2022 appears to be that Great Plains will purchase more firm pipeline capacity than it needs to serve its design day and then resells or releases some portion of that capacity for the heating season. It has used capacity release to lower its firm heating season capacity for the past three years.³⁸ GPNG contracts for this "extra" capacity entirely or almost entirely on Viking.

Great Plains explained that VGT's supply/demand situation and its rates for year-round firm capacity are such that the Company has been able to generate more revenue from that "extra" capacity over

³⁷ See Department Exhibit 2.

³⁸ The Company sold 2,600, 2,200 and 2,000 Dk/day via capacity release for the 2018-2019 through 2020-2021 heating seasons, respectively. Great Plains did not use the capacity release option for the 2021-2022 heating season and then restarted in the 2022-2023 heating season, releasing 4,291 Dk/day for the 2022-2023 and 2023-2024 heating seasons, as well as 8,000 Dk/day for the 2024-2025 heating season. The Company proposed to release 8,000 Dk/day for the 2025-2026 heating season.

the five-month heating season via capacity release than the cost of year-round capacity under Viking's tariffed rate. The income resulting from the capacity release sale minus the year-round cost of the capacity under tariffed rates is credited to ratepayers.³⁹ In the 2024-2025 heating season, the Company released 8,000 Dk/day of VGT capacity and earned a total credit of \$745,345.⁴⁰

Table 5 summarizes this information.

Table 5 – Great Plains Capacity Releases during the Winter Season Months, Revenue, Costs and Net Benefit to Ratepayers by year – 2022 – 2025⁴¹

Year	Amount of Capacity Released (Dks.) (a)	VGT tariffed rate (\$/Dk) (b)	Cost of VGT Capacity Released (\$/yr) ⁴² (c)	Avg Winter Season Capacity Release Rate (\$/Dk.) (d)	Total Winter Season Capacity Release Revenue (Nov - Mar) ⁴³ (e)	Net Benefit to Ratepayers (\$/yr) ⁴⁴ (f)
2022	4,291	\$3.806	\$195,979	\$13.594	\$291,657	\$95,679
2023	4,291	\$3.806	\$195,979	\$16.476	\$353,484	\$157,505
2024	8,000	\$5.620	\$559,145	\$18.633	\$745,300	\$186,155
3 Yr Avg	5,527	\$4.60	\$305,137	\$17.098	\$472,528	\$167,390
2025	8,000	\$5.620	\$539,520	\$17.098	\$683,914	\$144,394

Great Plains' strategy of purchasing extra capacity on Viking to resell during the winter season between 2022 and 2024 resulted in a credit to the Company's ratepayers of \$466,449.⁴⁵

For the 2025-2026 heating season, VGT's higher rate for firm capacity (\$5.62 vs. \$3.806) lowers the forecasted amount of the credit such that it is less than the three-year average (\$144,394 vs. \$167,390).

The Department also notes that Great Plains' request to maintain the contracts for more than 8,000 Dth/day of firm pipeline capacity which the Company doesn't need to serve its design day in this docket is very uncommon. The fact that GPNG also pledges to sell that "extra" capacity via capacity

³⁹ Income = Revenue – Expenses. In this instance, the revenue term in the equation is equal to the revenue generated from the winter season capacity release sales minus the expense or cost resulting from maintaining this capacity under VGT's tariffed rates for the entire year.

⁴⁰ Petition at 3.

⁴¹ All the information in Table 5 was taken from Great Plains' annual demand entitlement filings or updates except for the calculation of cost of VGT capacity released, total winter season capacity release revenue (Nov-May), and calculation of the net benefit to ratepayers. The Department's estimated capacity release rate for the 2025-2026 heating season is the average of the previous of three years. Calculation: (\$472,528/5,527 dk)/5 months = \$17.098 dk/month.

⁴² (a x b x 12) = c

⁴³ (a x d x 5) = e

⁴⁴ (e – c) = f

⁴⁵ Calculation: (\$95,679 + \$157,505 + \$213,265 = \$466,449).

release for the entire 2025-2026 winter season is also unusual compared to other rate-regulated natural gas distribution utilities.

The Department discussed this point in its comments in the Company's 2024-2025 filing at length.⁴⁶

The Department is providing these comments in early October 2025, without knowing the results of GP's effort to sell the 8,000 Dk via capacity release. Given this timing of events, the Department will not recommend a change to the Company's proposal to release the 8,000 Dk of capacity for the 2025-2026 heating season. Instead, the Department will wait to see what the Company's forecasted capacity release rate for the 2025-2026 heating season is. That information has been included historically in the Company's Informational Update.

While the Company's strategy of crediting the benefits of the capacity release sale during the winter season is beneficial for its ratepayers, Great Plains approach lessens the importance of the Company's proposed reserve margin to 7.98%. The concept of a reserve margin is that it provides the Commission and other interested parties an estimate of operational risk of consumer demand exceeding the Company's estimated design-day. Given Great Plains ability to select the amount of capacity it chooses to release, the Company has discretion as to the size of its reserve margin.⁴⁷

The Company's proposed reserve margin appears acceptable and is within the historical range in which the Company has operated since the 2006-2007 heating season.⁴⁸

The Department concludes the Company likely has sufficient capacity to ensure firm reliability on a peak day. As discussed above, if the actual peak day send out per customer that occurred during the 2024-2025 heating season is representative of conditions that may occur during a future -25°F for 24-hours peak day, then the effective design-day figure may be lower than estimated, resulting in a greater effective reserve margin.

The Department will however, defer making a recommendation on Great Plains' proposed reserve margin until it has had the opportunity to review additional information GPNG will provide in its Reply Comments and Informational Update.

⁴⁶ *In the Matter of Great Plains Natural Gas Co. for Approval of Changes in Contract Demand Entitlements for the 2024-2025 Winter Heating Season*, Department of Commerce, Comments and Response Comments, October 18, 2024, December 20, 2024 Docket No. G004/M-24-234, (eDockets. [202410-211132-01](#) and [202412-213275-01](#)), at 10 and at 7 (hereinafter "2024 Petition – Department Comments").

⁴⁷ The Department notes that it has previously provided a detailed discussion and update on the reserve margin discussion in its November 29, 2017, Comments in Docket No. G004/M-17-521 (eDockets [201711-137046-01](#)) and in its August 29, 2018, Comments (eDockets [20188-146093-01](#)) and August 1, 2019, Supplemental Comments (eDockets [20198-154884-01](#)) in Docket No. G004/M-18-454.

⁴⁸ See Department Exhibit 2.

F. THE COMPANY'S PGA COST-RECOVERY PROPOSAL

The demand entitlement amounts listed above, and, in the Company's, Petition represent the demand entitlements for which Great Plains' firm customers would pay. In its Petition, the Company used its July 2025 PGA to compare its proposed changes. Great Plains presented an analysis indicating that the Company's demand entitlement proposal would result in the following estimated annual rate impacts for customers:⁴⁹

- An annual bill increase of \$60.94 or approximately 8.7 percent, for the average residential customer consuming 81.2 Dth annually; and
- An annual bill increase of \$327.22 or approximately 9.3 percent, for the average firm general service customer consuming 436 Dth annually.

The bill impacts described above should be considered estimates and relate solely to changes in demand cost and are based on the demand data and information provided by the Company. They also assume Great Plains receives Viking's tariffed rate for the winter season capacity the Company has offered through VGT's capacity release service and that the rate increase NNG has proposed is approved by FERC. Both of those assumptions are conservative in that they push rates higher.

Regarding GPNG's use of VGT's tariff rate to estimate the credit to ratepayers resulting from the sale of excess capacity on Viking during the winter season, the Department notes the supply of firm pipeline capacity is constrained due to a few factors. Yet, the demand for natural gas in Minnesota and surrounding states continues to grow. In general, all pipelines in the Upper Midwest are fully subscribed and any firm/party that wants additional capacity is going to have to pay a rate that is higher than the current tariffed rates.⁵⁰

In addition, existing pipelines are filing to increase their existing tariffed rates. For example, on July 1, 2025, NNG filed a Section 4 rate case with FERC in Docket RP25-989. Northern proposed an increase to recover costs incurred from asset modernization efforts, stating that it had \$1.1 billion of investments in its pipeline system which have not yet been included in rates. NNG's proposal included increases to Northern's Market Rates of 85 percent. Northern also proposed a 48 percent increase in its storage reservation and capacity rates. The rates will be effective January 1, 2026, subject to refund.⁵¹ When asked what the impact on a residential customer bill would be assuming FERC agrees to a 35% increase across the board for NNG in IR 18, the Company calculated an increase of \$72 per year using

⁴⁹ Petition Exhibit C.

⁵⁰ The long-term option in this situation is to bid on additional capacity an existing pipeline is willing to construct, which usually requires a large Contribution in Aid of Construction (CIAC). The short-term option is to bid on capacity in the capacity release market.

⁵¹ See Attachment DOC-5.

90 Dk/year.⁵² The Department selected the 35 percent increase since FERC approved a similar increase in Northern's most recent FERC rate case.

The Department requests that Great Plains discuss the information it has received from NNG regarding the proposed rate changes and provide an estimate of the impact of the proposed increases on GPNG's average customer by class in its Reply Comments.

The Department will provide a recommendation once it has had the opportunity to review information the Company will provide in Reply Comments and its Informational Update regarding the current status of NNG's 2025 FERC rate case.

G. COMPLIANCE WITH REPORTING REQUIREMENTS INCLUDED IN COMMISSION ORDERS

G.1 Compliance with the February 17, 2023, Order

The February 17, 2023, Orders in Docket No. G004/M-21-135 and G004/M-21-235 established the following requirement for demand entitlement filings in Order Point 9 of:

In future contract demand entitlement filings, the gas utilities in this docket shall discuss how changes to their pipeline capacity affect their supply diversity and, if pipeline capacity comes at a cost premium but increases supply diversity, provide a meaningful cost/benefit discussion of the tradeoff, including a comparison with the least-cost capacity option.

The Company responds with the following in the Petition:

Pursuant to proceedings, hearings, and filings, Great Plains maintains a regionally diverse portfolio making nearly equal purchases from all three of its major trading locations. With that in mind, Great Plains has increased its monthly use of VGT capacity.

...

This increase of utilization does not strictly relate to either base or spot purchases. It does, however, demonstrate that Great Plains recognizes that opportunities for less expensive supply can be found at Emerson versus other locations.⁵³

The Department concludes that the Commission's requirement regarding supply diversity was met and requests that the Company continue to include the required information in its demand entitlement

⁵² Attachment DOC-6 includes the Company's response to DOC Information Request No. 18.

⁵³ Petition at 7.

filings. If no changes to pipeline capacity impact supply diversity, then the Company should confirm this in the filing.

G.2 Compliance with the November 26, 2024, Order

Order Point 2 of the November 26, 2024, Order in Docket Nos. G004/M-22-310 and G004/M-23-262 required the Company in its 2025-2026 demand entitlement filings, to provide additional information for the new VGT FT-A 10-year contract⁵⁴. The requirements of Order Point 2 are as follows:

Regarding the Company's New VGT FT-A 10 Year Contract in the demand entitlement filings for the 2025-2026 heating season the Company not only provide updates on Customer #4, but also, given its excess capacity situation, explain in detail as follows:

- Whether the Company can turn this VGT-FT-A 3,291 Dth/day capacity back with no penalty, or will it incur penalties from Viking.
- Whether the Company cannot rollover and not renew some of the expiring 2027 FT-A capacity.
- Whether the Company can decrease its excess capacity.
- How much of the capacity has been utilized to take advantage of the price differentials between Emerson and Ventura between November 1, 2022, and demand entitlement filings for the 2025-2026 heating season; and,
- How much delivery capacity on NNG has been reallocated to NNG connected communities because of using the new VGT FT-A contract, between November 1, 2022, to the demand entitlement filings for the 2025-2026 heating season.

The Company complied with the Commission Order by providing the following details in the Petition:

- a. Provide updates on Customer #4.

Customer #4 has elected to relocate outside of Minnesota.⁵⁵

- b. Given excess capacity, explain in detail whether the Company can return this VGT-FT-A 3,291 dk/day capacity back with no penalty.

The Company cannot turn back capacity without penalty.⁵⁶

- c. Given excess capacity, explain in detail whether the Company cannot rollover and not renew some of the expiring 2027 FT-A capacity.

⁵⁴ Contract effective November 1, 2022, through October 31, 2032.

⁵⁵ Petition at 5.

⁵⁶ *Id.*

The Company could choose to forego the renewal of any expiring capacity in the future.⁵⁷

- d. Given excess capacity, explain in detail whether the Company can decrease its excess capacity.

The Company does decrease its excess transportation capacity via capacity release mechanisms offered by VGT. This practice has proven to be successful for several years.⁵⁸

- e. Given excess capacity, explain in detail how much of the capacity has been utilized to take advantage of the price differentials between Emerson and Ventura between November 1, 2022, and demand entitlement filings for the 2025-2026 heating season.

A total of 524,285 dk has been scheduled using the contract since November 1, 2022. The coinciding Emerson purchases may otherwise have been executed at Ventura.⁵⁹

- f. Given excess capacity, explain in detail how much delivery capacity on NNG has been reallocated to NNG connected communities because of using the new VGT FT-A contract between November 1, 2022, to the demand entitlement filings for the 2025-2026 heating season.

None of the “supplemental” capacity has been reallocated to become NNG delivery since November 1, 2022. NNG quoted the cost to be \$5.3 million to allow for such reallocation. According to the Company, the cost is “unduly prohibitive at this time”.⁶⁰

The Department concludes that the Commission’s requirement was met.

G.3 Compliance with the May 19, 2025, Order

Order Point 5 of the May 19, 2025, Order in Docket No. G004/M-24-234 required the Company in its 2025-2026 demand entitlement filings, to provide the additional information for the 5,000 dk/day contract.⁶¹ Those requirements along with the Company’s responses are as follows:

- a. Whether the Company can turn the VGT-FT-A 5,000 dk/day capacity back with no penalty, or whether will it incur penalties from Viking.

The Company cannot turn back the capacity without penalty.⁶²

- b. Whether the Company cannot rollover and not renew some of the expiring 2027 FT-A capacity.

⁵⁷ *Id.*

⁵⁸ *Id.*

⁵⁹ *Id.*

⁶⁰ *Id.*

⁶¹ Contract renewed effective November 1, 2023, through October 31, 2028.

⁶² Petition at 6.

The Company could choose to forego the renewal of any expiring capacity in the future.⁶³

- c. Whether the Company can decrease its excess capacity.

The Company decreases its excess transportation capacity via capacity release mechanisms offered by VGT. This practice has proven to be successful for several years.⁶⁴

The Department concludes that the Commission's reporting requirements have been met.

IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of Great Plains' 2025-2026 heating season demand entitlement petition and the information in the record, the Department has prepared preliminary recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above. The Department will provide its final recommendations to the Minnesota Public Utilities Commission after Great Plains files its Reply Comments and Informational Update.

A. SUMMARY

- The Department has no recommendations regarding this section.

B. PROPOSED DEMAND ENTITLEMENT LEVEL

- The Department will defer making a recommendation on Great Plains' proposed demand entitlement as well as its proposal to release 8,000 Dth via capacity release for the entire winter season on Viking for the 2025-2026 heating season until it has had the opportunity to review additional information GPNG will provide in its Reply Comments and Informational Update.

C. DESIGN-DAY REQUIREMENT

- The Department recommends the Commission accept the Company's design day estimate for 2025-2026 heating season without adjusting for the effects of electrification or decarbonization.

D. EFFECTS OF ELECTRIFICATION-DECARBONIZATION ON GREAT PLAINS 2025-2026 HEATING SEASON DESIGN DAY

- The Department has no recommendations regarding this section.

⁶³ *Id.*

⁶⁴ *Id.*

E. PROPOSED RESERVE MARGIN

- The Department will defer making a recommendation on Great Plains' proposed reserve margin until it has had the opportunity to review additional information GPNG will provide in its Reply Comments and Informational Update.

F. THE COMPANY'S PGA COST-RECOVERY PROPOSAL

- The Department requests the Company discuss the information it has received from Northern Natural Gas regarding the proposed rates changes resulting from NNG's 2025 FERC rate case.

G. COMPLIANCE WITH REPORTING REQUIREMENTS INCLUDED IN COMMISSION ORDERS

- The Department recommends the Commission find that Great Plains has complied with the reporting requirements included in the Commission's various orders regarding demand entitlement.

Attachments

Title	Description	Topic
DOC-1	DOC IR No. 17/Company response	Design Day Auto-Correlation Calculation
DOC-2	DOC IR No. 6/Company response	Decarbonization/Electrification
DOC-3	DOC IR Nos. 7-15/Company responses	Decarbonization/Electrification
DOC-4	DOC IR No. 16/Company response	Sharing of Firm Pipeline Capacity during Emergencies
DOC-5	Section 4 Rate Case Filing Northern Natural Gas Customer Call - June 16, 2025	NNG 2025 Section 4 Rate Case Customer Presentation
DOC-6	DOC IR No. 18/Company's response	NNG Rate Case Scenario

Exhibits

Title	Description	Topics
Department Exhibit 1	Demand Entitlement Historical and Current Proposal	Historical Information 2015-2016 through 2025-2026
Department Exhibit 2	Demand Entitlement Analysis	Summary information on Number of Customers, Design Day, Demand Entitlement, Reserve Margin, Firm Peak Day Sendout, Per Customer Metrics



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

Docket Number: G004/M-25-71

Nonpublic Public

Requested From: Travis R. Jacobson, Great Plains Natural Gas

Date of Request: 8/11/2025

Type of Inquiry: Financial

Response Due: 8/21/2025

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

Assigned Analyst(s): John Kundert, Ashley Uphus

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

Phone Number(s): 651-539-1740, 651-539-1787

ADDITIONAL INSTRUCTIONS:

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Request Number: 17

Topic: Design Day Model

Reference(s): Auto-correlation in model Petition at 2.

Request:

1. Please identify the frequency and distribution of the auto-correlation in the regression model.
2. Please provide the analysis that demonstrates that the effects of auto-correlation in the model are not material.

Response:

1. Auto-correlation can be found seasonally for periods of 3 to 4 months.
2. Please see the attached Microsoft Excel file Response No. 17 Attachment A. The table below is the summary of results noting that a correction for autocorrelation only represents a 2% change to design day requirement.

Adjusted																
Area	Rate	Custom ers	Base	Variable 1 (HD60)	Variable 2 (as applicable)	Variable 3 (as applicable)	Variable 4 (as applicable)	Design HD60	Demand	L&U	Delivery Requirement	Durbin, Watson	Hypothesis	Additional Variable(s)	Variance	Variance %
Crookston	C60	2,351	0.023169956	0.010308304	-0.033378743	-0.023450788		97	2,272	16	2,288	1.91	Do not reject	Jun-Jul, Jan-Mar 24	(76)	-3%
Crookston	C70	311	0.27141184	0.045983611	-0.103134948	0.120291628		97	1,477	10	1,487	1.76	Do not reject	Sep-Nov 21, Jan-Mar 24	(6)	0%
North 4	N60	6,499	0.02305515	0.009551724	-0.011475728	0.0179754		90	5,779	40	5,819	1.87	Do not reject	Oct 22 - Apr 23	(71)	-1%
North 4	N70	1,001	0.266667473	0.046525317	-0.127982018	-0.133773453		90	4,196	29	4,226	1.77	Do not reject	Oct-Dec	(103)	-2%
South	S60	10,420	0.018151209	0.0105656837	-0.010504082	-0.015493933		82	8,938	63	9,001	1.76	Do not reject	Jan-Apr 22, Dec 23 - Feb 24	(163)	-2%
South	S70	1,799	0.250277153	0.053192227	-0.103853654			82	8,110	57	8,167	2.13	Do not reject	Oct-Nov	(147)	-2%
Totals										34,110	239	34,349			(584)	-2%

To be completed by responder

Response Date: August 21, 2025

Response by: Travis Jacobson, Vice President of Regulatory Affairs

Email Address: travis.jacobson@mdu.com

Phone Number: 701.222.7855



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Request Number: 6

Topic: Effect of electric heat pumps on Great Plains' 2025 design day calculation for the residential class

Reference(s): N/A

Request:

1. Please provide a narrative that explains GPNG's process or protocol for estimating the effects of the number of electric heat pumps that are being installed on its 2025-2026 residential design day calculation.
2. Please explain GPNG's process for identifying which GPNG residential customers have installed electric heat pumps.
3. Please provide the analysis the Company performed to determine its approach for incorporating the effects of the penetration of electric heat pumps in its 2025-2026 residential design day calculations.
4. What other approaches (for incorporating the effects of the penetration of non-heat pump electrification technologies) did GPNG consider but not use? Please explain in detail.
5. Did the Company include any adjustment(s) to its 2025-2026 design day calculations to incorporate the impacts of residential electric heat pumps?
6. If so, please explain the adjustments and provide the analysis.

Response:

Great Plains does not have a process in place to estimate the installations or effects of heat pumps or other electrification technologies for any class of customers. Therefore, Great Plains is not incorporating an analysis or adjustment for electrification technologies in its design day calculations. The main reason being that Great Plains has a small service territory mainly located in rural areas.

To be completed by responder

Response Date: August 21, 2025

Response by: Travis Jacobson, Vice President of Regulatory Affairs

Email Address: travis.jacobson@mdu.com

Phone Number: 701.222.7855



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Response Number 6 continued:

The Company has a very low growth rate and has not seen any significant demand changes from customers relating to electrification.

To be completed by responder

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Request Number: 7

Topic: Effect of electric heat pumps on GPNG's 2025 design day calculation for the other firm classes

Reference(s): N/A

Request:

1. Please provide a narrative that explains GPNG's process or protocol for estimating the effects of the number of electric heat pump that are being installed on its 2025-2026 design day calculations for the remaining firm customer classes.
2. Please explain GPNG's process for identifying which GPNG customers from the remaining firm customer classes have installed electric heat pumps.
3. Please provide the analysis the Company performed to determine its approaches for incorporating the effects of the penetration of electric heat pumps in its 2025-2026 design day calculations for the remaining firm customer classes.
4. What other approaches (for incorporating the effects of the penetration of non-heat pump electrification technologies) did GPNG consider but not use? Please explain in detail.
5. Did the Company include any adjustment(s) to its 2025-2026 design day calculations for the other firm customer classes to recognize the impacts of electric heat pumps?
6. If so, please explain the adjustments and provide the analysis.

Response:

Please refer to Response Number 6.

To be completed by responder

Response Date: August 21, 2025

Response by: Travis Jacobson, Vice President of Regulatory Affairs

Email Address: travis.jacobson@mdu.com

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Request Number: 8

Topic: Effects of non-heat pump electrification technologies on GPNG's 2025-2026 residential design day calculation

Reference(s): N/A

Request:

1. Please provide a narrative that explains GPNG's process or protocol for estimating the effects of the installation of non-heat pump electrification technologies that are being installed for use by GPNG's residential customers and the forecasted effects of non-heat pump electrification technologies on the Company's 2025-2026 residential design day calculations.
2. Please explain GPNG's process for identifying which residential customers have installed non-heat pump electrification technologies.
3. Please provide the analysis the Company performed to determine its approach for incorporating the effects of the penetration of non-heat pump electrification technologies in its 2025-2026 residential design day calculations.
4. What other approaches (for incorporating the effects of the penetration of non-heat pump electrification technologies) did GPNG consider but not use? Please explain in detail.
5. Did the Company include any adjustments to its 2025-2026 residential design day calculations to incorporate the impacts of these non-heat pump electrification technologies?
6. If so, please explain the adjustments and provide this analysis.

Response:

Please refer to Response Number 6.

To be completed by responder

Response Date: August 21, 2025

Response by: Travis Jacobson, Vice President of Regulatory Affairs

Email Address: travis.jacobson@mdu.com

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Type of Inquiry: Financial

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Request Number: 9

Topic: Effects of electrification technologies on the firm commercial customer classes in GPNG's 2025-2026 design day calculations

Reference(s): N/A

Request:

1. Has GPNG identified any electrification technologies currently in use in its service area that displace the use of natural gas technology and the effect of those electrification technologies on the 2025-2026 firm commercial design day calculations? Please explain in detail.
2. Provide a narrative that delineates the Company's process of data collection and analysis for the different electrification technologies identified for the firm commercial classes.
3. Please provide the analysis the Company performed to determine its approach for incorporating the effects of the penetration of forms of electrification technologies in its 2025-2026 firm commercial customer classes design day calculations.
4. What other approaches (for incorporating the effects of the penetration of electrification technologies) did GPNG consider but not use? Please explain in detail.
5. Did the Company include any adjustments to its 2025-2026 firm commercial design day calculations to incorporate the impacts of these electrification technologies?
6. If so, please explain the adjustments and provide this analysis.

Response:

Please refer to Response Number 6.

To be completed by responder

Response Date: August 21, 2025

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Request Number: 10

Topic: Effects of electrification technologies on the firm industrial customer classes in GPNG's 2025-2026 design day calculations

Reference(s): N/A

Request:

1. Has GPNG identified any electrification technologies currently that affect the 2025-2026 design day calculations for the firm industrial customer classes? Please explain in detail.
2. Provide a narrative that delineates the Company's process of data collection and analysis for the different electrification technologies identified for the firm industrial customer classes.
3. Please provide the analysis the Company performed to determine its approach for incorporating the effects of the penetration of forms of electrification technologies in its 2025-2026 firm industrial customer classes design day calculations.
4. What other approaches (for incorporating the effects of the penetration of electrification technologies) did GPNG consider but not use? Please explain in detail.
5. Did the Company include any adjustments to its 2025-2026 firm industrial design day calculations to incorporate the impacts of these electrification technologies?
6. If so, please explain the adjustments provide this analysis.

Response:

Please refer to Response Number 6.

To be completed by responder

Response Date: August 21, 2025

Response by: Travis Jacobson, Vice President of Regulatory Affairs

Email Address: travis.jacobson@mdu.com

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

Assigned Analyst(s): John Kundert, Ashley Uphus

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

Phone Number(s): 651-539-1740, 651-539-1787

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: 11

Topic: Effects of electric heat pumps on GPNG's 2025-2026 heating season on forecasted residential monthly sales

Reference(s): N/A

Request:

1. Please provide a narrative that explains GPNG's process or protocol for estimating the effects of the number of electric heat pumps that are being installed in its service area on its 2025-2026 heating season residential forecasted monthly sales.
2. Please provide the analysis the Company performed to determine its approach for incorporating the effects of the penetration of electric heat pumps in its 2025-2026 heating season residential forecasted monthly sales.
3. What other approaches (for incorporating the effects of the penetration of electric heat pumps) did GPNG consider but not use? Please explain in detail.
4. Did the Company include any adjustments to its 2025-2026 heating season residential forecasted monthly sales to incorporate the impacts of electric heat pumps?
5. If so, please explain the adjustments and provide this analysis.

Response:

Please refer to Response Number 6.

To be completed by responder

Response Date: August 21, 2025

Response by: Travis Jacobson, Vice President of Regulatory Affairs

Email Address: travis.jacobson@mdu.com

Phone Number: 701.222.7855



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

Docket Number: G004/M-25-71

Nonpublic Public

Requested From: Travis R. Jacobson, Great Plains Natural Gas

Date of Request: 8/11/2025

Type of Inquiry: Financial

Response Due: 8/21/2025

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

Assigned Analyst(s): John Kundert, Ashley Uphus

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

Phone Number(s): 651-539-1740, 651-539-1787

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: 12

Topic: Effects of non-heat pump electrification technologies on GPNG's 2025-2026 heating season residential forecasted monthly sales

Reference(s): N/A

Request:

1. Please provide a narrative that explains GPNG's process or protocol for estimating the effects of the installation of non-heat pump electrification technologies that are being installed for use by residential customers and the effects this change has on the Company's 2025-2026 heating season residential forecasted monthly sales.
2. Please provide the analysis the Company performed to determine its approach for incorporating the effects of the penetration of non-heat pump electrification technologies in its 2025-2026 heating season residential forecasted monthly sales.
3. What other approaches (for incorporating the effects of the installation of non-heat pump electrification technologies) did GPNG consider but not use? Please explain in detail.
4. Did the Company include any adjustments to its 2025-2026 heating season residential monthly sales to incorporate the impacts of these non-heat pump forms of electrification?
5. If so, please explain the adjustments and provide this analysis.

Response:

Please refer to Response Number 6.

To be completed by responder

Response Date: August 21, 2025

Response by: Travis Jacobson, Vice President of Regulatory Affairs

Email Address: travis.jacobson@mdu.com

Phone Number: 701.222.7855



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

Docket Number: G004/M-25-71

Nonpublic Public

Requested From: Travis R. Jacobson, Great Plains Natural Gas

Date of Request: 8/11/2025

Type of Inquiry: Financial

Response Due: 8/21/2025

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

Assigned Analyst(s): John Kundert, Ashley Uphus

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

Phone Number(s): 651-539-1740, 651-539-1787

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: 13

Topic: Effects of electrification technologies used by the commercial class on 2025-2026 heating season commercial monthly sales forecast

Reference(s): N/A

Request:

1. Has GPNG identified any electrification technologies currently in use in its service area that effect the Company's 2025-2026 heating season commercial forecasted monthly sales?
2. Please provide the analysis the Company performed to determine its approach for incorporating the effects of the penetration of electrification technologies in its 2025-2026 heating season commercial monthly sales calculation.
3. What other approaches (for incorporating the effects of electrification technologies) did GPNG consider but not use? Please explain in detail.
4. Did the Company include any adjustments to its 2025-2026 heating season commercial forecasted monthly sales to incorporate the impacts of these different electrification technologies?
5. If so, please explain the adjustments and provide this analysis.

Response:

Please refer to Response Number 6.

To be completed by responder

Response Date: August 21, 2025

Response by: Travis Jacobson, Vice President of Regulatory Affairs

Email Address: travis.jacobson@mdu.com

Phone Number: 701.222.7855



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

Docket Number: G004/M-25-71

Nonpublic Public

Requested From: Travis R. Jacobson, Great Plains Natural Gas

Date of Request: 8/11/2025

Type of Inquiry: Financial

Response Due: 8/21/2025

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

Assigned Analyst(s): John Kundert, Ashley Uphus

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

Phone Number(s): 651-539-1740, 651-539-1787

ADDITIONAL INSTRUCTIONS:

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Request Number: 14

Topic: Effects of electrification technologies used by the industrial customer class on 2025-2026 heating season industrial monthly sales forecast

Reference(s): N/A

Request:

1. Has GPNG identified any electrification technologies currently in use in its service area that affect the Company's 2025-2026 heating season industrial forecasted monthly sales?
2. Please provide the analysis the Company performed to determine its approach for incorporating the effects of the penetration of forms of electrification technologies in its 2025-2026 industrial monthly sales calculation.
3. What other approaches (for incorporating the effects of electrification technologies) did GPNG consider but not use? Please explain in detail.
4. Did the Company include any adjustments to its 2025-2026 heating season industrial forecasted monthly sales to incorporate the impacts of these electrification technologies?
5. If so, please explain the adjustments and provide this analysis.

Response:

Please refer to Response Number 6.

To be completed by responder

Response Date: August 21, 2025

Response by: Travis Jacobson, Vice President of Regulatory Affairs

Email Address: travis.jacobson@mdu.com

Phone Number: 701.222.7855



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

Docket Number: G004/M-25-71

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Requested From: Travis R. Jacobson, Great Plains Natural Gas

Date of Request: 8/11/2025

Type of Inquiry: Financial

Response Due: 8/21/2025

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Assigned Analyst(s): John Kundert, Ashley Uphus

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

Phone Number(s): 651-539-1740, 651-539-1787

ADDITIONAL INSTRUCTIONS:

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Request Number: 15

Topic: Analysis of different statistical approaches to existing regression models that allow for the incorporation of electrification technologies

Reference(s): N/A

Request:

1. Has GPNG analyzed statistical approaches other than its existing regression models that would allow GPNG to incorporate the effects of electrification technologies on its annual forecasted design day and forecasted monthly sales?
2. If so, please explain the statistical approaches and provide the analysis.

Response:

1. No. Please refer to Response Number 6.
2. Not applicable.

To be completed by responder

Response Date: August 21, 2025

Response by: Travis Jacobson, Vice President of Regulatory Affairs

Email Address: travis.jacobson@mdu.com

Phone Number: 701.222.7855



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

Docket Number: G004/M-25-71

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Requested From: Travis R. Jacobson, Great Plains Natural Gas

Date of Request: 8/11/2025

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Response Due: 8/21/2025

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Assigned Analyst(s): John Kundert, Ashley Uphus

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Phone Number(s): 651-539-1740, 651-539-1787

ADDITIONAL INSTRUCTIONS:

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Request Number: 16

Topic: Agreements with electric utilities to share interstate pipeline capacity during extreme weather events

Reference(s): N/A

Request:

1. Has GPNG identified any electric utilities in Minnesota with whom it would be beneficial to share interstate pipeline capacity during extreme weather events?
2. Has GPNG initiated discussions regarding such an agreement with any electric utilities in Minnesota?

Response:

1. No.
2. No.

To be completed by responder

Response Date: August 21, 2025

Response by: Travis Jacobson, Vice President of Regulatory Affairs

Email Address: travis.jacobson@mdu.com

Phone Number: 701.222.7855



Section 4 Rate Case Filing Northern Natural Gas Customer Call

June 16, 2025





Why is Northern Filing a Rate Case?

- Northern Natural Gas is filing this rate case due to the significant capital being invested in its pipeline system to comply with pipeline safety requirements and maintain reliability of its service to customers
- Northern's last section 4 rate case was filed July 1, 2022, in Docket No. RP22-1033, and was settled in 2023, with a Commission order approving the settlement September 7, 2023
- Northern is in the midst of a generational capital investment program to update and modernize its pipeline system
 - Northern's first pipeline began serving customers in 1930, with significant expansions in the 1940s through 1960s
 - The A-line, which is the original pipeline installed, is in the process of being abandoned (628 miles abandoned through 2025, with another 106 miles to be abandoned in 2027)
 - Other vintage pipeline and obsolete compressor units that are no longer serviced by the original manufacturer are being replaced



Asset Modernization Activity

- Northern began discussions as early as 2014 with its customers to advise of the need to modernize its pipeline system; however, Northern was unsuccessful in achieving a consensus for an asset modernization tracker
- By the end of 2034, Northern anticipates having invested \$4.5 billion in asset modernization since the program began. Northern will have invested \$2 billion by the end of 2025
- More recently, since the last rate case, and estimated through the end of 2025, Northern will have invested \$1.6 billion in asset modernization and maintenance capital that is not recovered in current rates, driving an approximately \$1.1 billion increase to rate base (27% increase from the last case)
- Northern has discussed potential interest in a pre-filed settlement with several customers to determine whether a pre-filed settlement with customers could be achieved. Feedback from these discussions, however, was not positive
- Due to continued asset modernization investment, another rate case is likely to be required within the next few years unless depreciation rates are increased to offset the investment



Section 4 Filing – Abbreviated Timeline

- Northern will file the rate case on July 1, 2025





Rate Base as of December 31, 2025

- Due primarily to asset modernization and other maintenance capital investment, Northern's rate base will have increased by \$1.1 billion since Northern's last rate case
- Northern's capital expenditures have significantly outpaced annual depreciation expense

Rate Base Items	RP25- Dec-25	Dec-22
[a] (In millions)	[b]	[c]
Gross Plant In Service	\$ 8,115.8	\$ 6,629.6
Accumulated Depreciation, Depletion & Amortization	<u>(1,849.9)</u>	<u>(1,541.9)</u>
Net Plant In Service	6,265.9	5,087.7
Regulatory Assets and Liabilities	(286.8)	(324.7)
Materials, Supplies and Prepayments	126.6	73.8
Accumulated Deferred Taxes	<u>(865.2)</u>	<u>(713.6)</u>
Total Rate Base	\$ 5,240.5	\$ 4,123.2
	Increase	\$ 1,117.3
	Percentage Change	27%



Increase in Cost of Service Driven Largely by Maintenance and Asset Modernization Capital

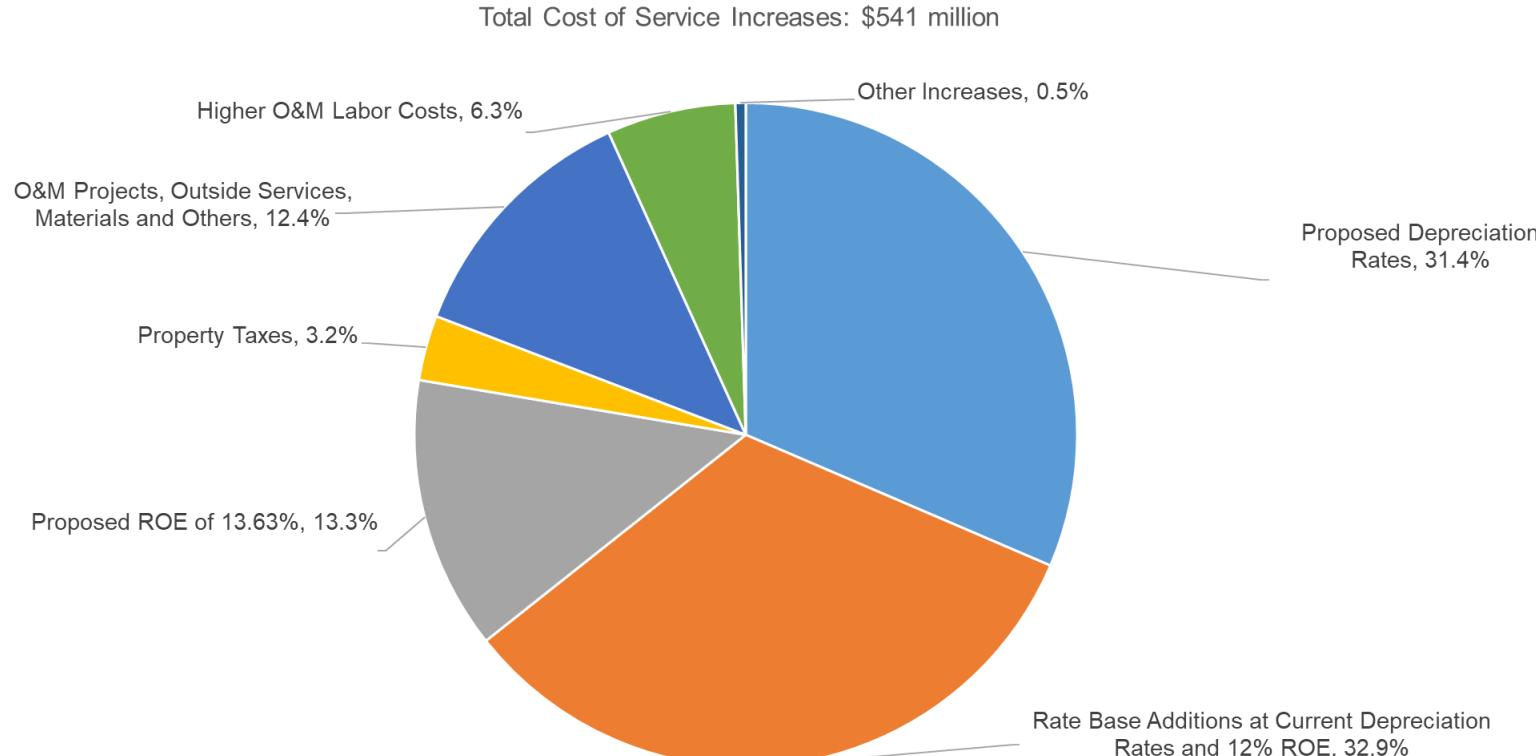
Highlights:

- The increased rate base due to increased capital investment accounts for \$195 million of the increase in cost of service
 - Asset modernization and other maintenance capital investment is estimated to account for \$176 million of the increase. Proposed depreciation rate increase accounts for \$170 million
- Proposed return on equity increase from 12% to 13.63% equals \$72 million

Particulars	RP25-COS Filing	2022 COS 45 Day Filing	Change	
[a] (In millions)	[b]	[c]	[d]	
O&M/A&G Expenses	\$ 430.9	\$ 329.8	\$ 101.0	\$46m O&M projects, \$34m O&M labor, \$21m Others (outside services, materials, others)
Depreciation and Negative Salvage Expense	407.8	192.0	215.9	\$170m increased depreciation and negative salvage rates \$46m plant additions
After-Tax Return	534.9	378.9	156.0	
Income Taxes Return and Taxes	<u>156.9</u> 691.8	<u>108.4</u> 487.2	<u>48.5</u> 204.5	\$132m increased rate base \$72m proposed 13.63% ROE
Property Taxes	91.0	73.8	17.2	Plant additions
Other	(7.2)	(9.6)	2.4	
Total Cost of Service	\$ 1,614.3	\$ 1,073.3	\$ 541.0	



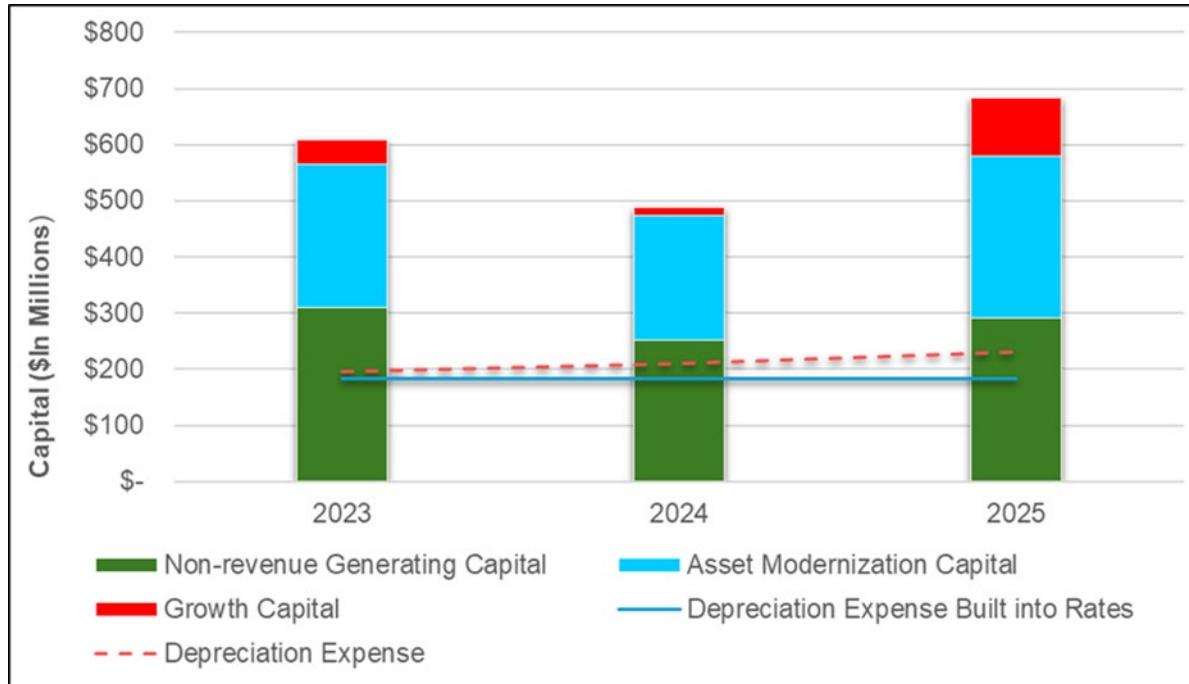
Cost of Service Increases



Maintenance and Asset Modernization Investments vs Depreciation



- Annual asset modernization and other maintenance capital investments continue to outpace annual depreciation expense built into existing rates



Capitalization and Return as of December 31, 2025

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- Northern's capital structure is consistent with that authorized by FERC
 - Equity percentage is lower than recent pipeline filings that are generally at 65% or higher
- Northern's cost of capital is lower than the industry average, and the proposed ROE of 13.63% is lower than recently filed returns that are in excess of 14.0%
- Northern's A2/A- credit ratings are the highest among interstate natural gas pipelines
- Northern's overall cost of its long-term debt is 4.51%

Capitalization Items	Capitalization at Dec 31, 2025		Capitalization Percentage	Rate	Rate of Return
	[a]	[b] (In millions)			
Debt Capital	\$ 2,100.0		37.56%	4.51%	1.70%
Common Stock Equity	\$ 3,491.3		62.44%	13.63%	8.51%
Total Capitalization	\$ 5,591.3		100.00%		10.21%
Total Rate Base					\$ 5,240.5
After-Tax Return Allowance					
Interest Expense					\$ 88.9
Equity Return					446.0
Total After-Tax Return					\$ 534.9

Book Depreciation and Negative Salvage Rates



- Northern is filing increased depreciation and negative salvage rates
 - An increase to depreciation rates to reflect an economic life of 28 years versus a current depreciable life of 40 years for transmission assets
 - An increase to existing negative salvage rates for transmission facilities
 - New negative salvage rates for underground and LNG storage facilities

Plant Category 1/	2023 Settlement		RP25-	
	Dep Rates	NS Rates	Dep Rates	NS Rates
[a]	[b]	[c]	[d]	[e]
Underground Storage	1.25%	0.00%	3.27%	0.75%
LNG Storage	2.95%	0.00%	2.81%	0.83%
Transmission	2.49%	0.10%	3.66%	1.16%

1/ Includes plant categories for which depreciation rate changes are being proposed

Base Case and Prospective Pro Forma Case Changes to Rate Schedules



- For the Base Case
 - Rates designed consistent with principles underlying the 2020 and 2023 Settlement rates
- For the Prospective Pro Forma Case
 - Northern is proposing a change in rate design to system-wide reservation rates
 - Northern is proposing to implement two postage stamp commodity rates for the Field Area; one for transportation within the current Mileage Indicator Districts 1-7 (Section 1) and a second for transportation within the current Mileage Indicator Districts 8-16B (Section 2)
 - Northern is proposing to discontinue Small Customer benefits that are not available to other shippers, including GS-T service

Base Case: Rates for Transmission and Storage Services



Transmission Rates	Transmission Rates						Storage Rates	Storage Rates			
	Winter			Summer				Current Rates	Proposed Rates	Percentage Change	
	Current Rates	Proposed Rates	Percentage Change	Current Rates	Proposed Rates	Percentage Change					
Reservation Rates											
Market Area							FDD Capacity	\$ 0.6731	\$ 0.9991	48%	
TF12 Base	\$17.417	\$ 32.225	85%	\$ 9.676	\$ 17.903	85%		\$ 3.2345	\$ 4.8003	48%	
TF12 Variable	\$23.609	\$ 43.682	85%	\$ 9.676	\$ 17.903	85%		\$ 0.0232	\$ 0.0228	-2%	
TF5	\$25.799	\$ 47.740	85%	\$ 9.676	\$ 17.903	85%		\$ 0.1624	\$ 0.2412	48%	
TFX	\$25.799	\$ 47.740	85%	\$ 9.676	\$ 17.903	85%					
Field Area											
TFX	\$13.476	\$ 30.925	129%	\$ 7.485	\$ 17.180	130%					
SMS	\$4.2550	\$ 7.8726	85%	\$4.2550	\$ 7.8726	85%					
Commodity Rates											
Market Area							FDD Reservation	\$ 0.6731	\$ 0.9991	48%	
TF/TFX Firm	\$0.0260	\$ 0.0228	-12%	\$0.0260	\$ 0.0228	-12%		\$ 3.2345	\$ 4.8003	48%	
TI	\$0.8742	\$ 1.5932	82%	\$0.3441	\$ 0.6117	78%		\$ 0.0232	\$ 0.0228	-2%	
GS-T	\$1.2001	\$ 2.1952	83%	\$1.2001	\$ 2.1952	83%		\$ 0.1624	\$ 0.2412	48%	
Field Area											
TFX Firm (Rate/100 miles)	\$0.0103	\$ 0.0082	-21%	\$0.0103	\$ 0.0082	-21%					
TI (Rate/100 miles)	\$0.2203	\$ 0.3935	79%	\$0.1269	\$ 0.2223	75%					
GS-T	\$0.8740	\$ 1.9652	125%	\$0.8740	\$ 1.9652	125%					
SMS	\$0.0208	\$ 0.0208	0%	\$0.0208	\$ 0.0208	0%					

Pro Forma Case: Rates for Transmission Services

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DOC-5
Page 13 of 15



Transmission Rates	Transmission Rates						
	Winter			Summer			
Current Rates	Proposed Rates	Percentage Change	Current Rates	Proposed Rates	Percentage Change		
Reservation Rates							
TF12 Base	\$ 17.417	\$ 33.588	93%	\$ 9.676	\$ 18.660	93%	
TF12 Variable	\$ 23.609	\$ 45.530	93%	\$ 9.676	\$ 18.660	93%	
TF5	\$ 25.799	\$ 49.760	93%				
TFX 1/	\$ 25.799	\$ 49.760	93%	\$ 9.676	\$ 18.660	93%	
SMS	\$ 4.2550	\$ 8.2056	93%	\$ 4.2550	\$ 8.2056	93%	
Commodity Rates							
Section 3 (Market)							
TF/TFX Firm	\$ 0.0260	\$ 0.0220	-16%	\$ 0.0260	\$ 0.0220	-16%	
TI	\$ 0.8742	\$ 1.6588	90%	\$ 0.3441	\$ 0.6358	85%	
Section 2 (Field - Midcontinent)							
TF/TFX Firm 2/	\$ 0.0103	\$ 0.0205	na	\$ 0.0103	\$ 0.0205	na	
TI 2/	\$ 0.2203	\$ 1.6573	na	\$ 0.1269	\$ 0.6343	na	
Section 1 (Field - Permian)			na				
TF/TFX Firm 2/	\$ 0.0103	\$ 0.0205		\$ 0.0103	\$ 0.0205		
TI 2/	\$ 0.2203	\$ 1.6573	na	\$ 0.1269	\$ 0.6343	na	
SMS	\$ 0.0208	\$ 0.0208	na	\$ 0.0208	\$ 0.0208	na	

1/ TFX percentage increase as compared to the current TFX Market Area reservation rate.

2/ Northern's current Field Area commodity rates are designed on a per 100 miles basis. Northern proposes to implement two postage stamp commodity rates in the Field Area; one for transportation within the current MIDs 1-7 (Section 1) and a second for transportation within the current MIDs 8-16B (Section 2).

Additional Information Found on Northern's Website

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Page 14 of 15



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Date Requested: Jun 12 2025 2:41 PM

- [2025 Maintenance Capital Projection - Customer Call](#)
- [Asset Modernization Presentation -- 2024 Update](#)
- [Maintenance Capital Plan -- April 2025](#)
- [Asset Modernization Report -- End of 2024](#)
- [Maintenance Capital Plan -- April 2024](#)
- [Asset Modernization Report -- December 2023](#)
- [Maintenance Capital Update -- December 2023](#)
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Regulatory / Regulatory And Rate Proceeding Documents

Date Requested: Jun 12 2025 2:45 PM

Customer Communications

This section contains links to customer communications regarding the Section 4 rate case Northern plans to file on July 1, 2025.

[Customer Call - Section 4 Filing Overview](#)

Miscellaneous Regulatory Documents

This section contains links to information regarding miscellaneous regulatory documents.

No Information to Display

If you have any questions or need assistance regarding this site, please call your marketing representative.





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

Docket Number: G004/M-25-71

Nonpublic Public

Requested From: Travis R. Jacobson, Great Plains Natural Gas

Date of Request: 8/11/2025

Type of Inquiry: Financial

Response Due: 8/21/2025

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Request Number: 18

Topic: NNG FERC Rate Case filed July 1, 2025

Reference(s): Petition at 3.

Request:

1. Please provide an update as to the status of this proceeding.
2. Is Great Plains participating in this proceeding?
What would be the impact on a residential customer bill assuming FERC agrees to a 35% across the board increase for NNG?

Response:

1. Northern Natural Gas's (NNG) recently filed rate case is in preliminary proceedings with settlement discussions ongoing.
2. Great Plains is participating in these proceedings through joint representation of small utilities and municipalities. Great Plains' analysis shows that a 35% increase in NNG's rates would represent a \$72/year increase for a residential customer using 90 dk/year.

To be completed by responder

Response Date: August 21, 2025

Response by: Travis Jacobson, Vice President of Regulatory Affairs

Email Address: travis.jacobson@mdu.com

Phone Number: 701.222.7855

Department Exhibit 1
Docket No. G004/M-25-71
Great Plains Demand Entitlement Historical and Current Proposal

Contract Type	Proposed As of 7/1/25												
	2015-2016 Quantity (Mcf)	2016-2017 Quantity (Mcf)	2017-2018 Quantity (Mcf)	2018-2019 Quantity (Mcf)	2019-2020 Quantity (Mcf)	2020-2021 Quantity (Mcf)	2021-2022 Quantity (Mcf)	2022-2023 Quantity (Mcf)	2023-2024 Quantity (Mcf)	2024-2025 Quantity (Mcf)	2025-2026 Quantity (Mcf)	Change in Quantity (Mcf)	Change in Capacity (%)
<u>VGT</u>													
FT-A (12-month)	13,000	13,000	13,000	18,000	18,000	18,000	18,000	21,291	21,291	21,291	21,291	-	-
FT-A (5-month)	2,700	3,400	2,000	2,000	2,000	2,000	2,000	2,000	2,000	2,000	2,000	-	-
BP (5-month)	-	-	1,600	-	-	-	-	-	-	-	-	-	-
Seasonal Capacity Release				(2,600)	(2,200)	(2,000)	-	(4,291)	(4,291)	(8,000)	(8,000)	-	-
Total VGT	15,700	16,400	16,600	17,400	17,800	18,000	20,000	19,000	19,000	15,291	15,291	-	-
<u>NNG</u>													
TFX (12-month)*	2,000	2,000	700	1,000	2,000	2,000	3,000	3,000	3,000	3,000	3,000	-	-
TFX (5-month)	6,200	6,200	6,200	6,200	6,200	6,200	5,200	5,200	5,200	5,200	5,200	-	-
TF12B	4,604	5,421	4,854	3,819	3,921	4,036	3,653	4,128	3,531	5,703	5,703	-	-
TF12V	2,931	2,114	2,681	3,716	3,614	3,499	3,882	3,407	4,004	5,242	5,242	-	-
TF5	3,410	3,410	3,410	3,410	3,410	3,410	3,410	3,410	-	-	-	-	-
TFX (Capacity Release)	(1,300)	(1,300)	-	-	-	-	-	-	-	-	-	-	-
Total NNG	17,845	17,845	17,845	18,145	19,145	-	-						
Total Entitlement	33,545	34,245	34,445	35,545	36,945	37,145	39,145	38,145	38,145	34,436	34,436	0.00%	-9.43%
Total Annual Transportation	22,535	22,535	21,235	26,535	27,535	27,535	28,535	31,826	31,826	35,236	35,236	0.00%	
Total Winter Only Transport	11,010	11,710	13,210	9,010	9,410	9,610	10,610	6,319	6,319	(800)	(800)	0.00%	
Percent of Winter Only Capacity	32.82%	34.19%	38.35%	25.35%	25.47%	25.87%	27.10%	16.57%	16.57%	-2.32%	-2.32%		

Source: Great Plains Exhibit B

Department Exhibit 2
Docket No. G004/M-25-71
Great Plains Demand Entitlement Analysis*

	Number of Firm Customers			Design-Day Requirement			Total Entitlement Plus Peak Shaving			Reserve Margin	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
Heating Season	Number of Customers	Change from Previous Year	% Change From Previous Year	Design Day (Dth)	Change from Previous Year	% Change From Previous Year	Total Design-Day Capacity (Dth)	Change from Previous Year	% Change From Previous Year	Reserve (7) - (4)	% Reserve [(7)-(4)]/(4)
2025-2026	22,439	109	0.49%	31,892	214	0.68%	34,436	291	0.85%	2,544	7.98%
2024-2025	22,330	(2,375)	-9.61%	31,678	(3,297)	-9.43%	34,145	(4,000)	-10.49%	2,467	7.79%
2023-2024	24,705	(85)	-0.34%	34,975	(184)	-0.52%	38,145	0	0.00%	3,170	9.06%
2022-2023	24,790	72	0.29%	35,159	760	2.21%	38,145	(1,000)	-2.55%	2,986	8.49%
2021-2022	24,718	293	1.20%	34,399	477	1.41%	39,145	2,000	5.38%	4,746	13.80%
2020-2021	24,425	109	0.45%	33,922	(144)	-0.42%	37,145	200	0.54%	3,223	9.50%
2019-2020	24,316	76	0.31%	34,066	392	1.16%	36,945	1,400	3.94%	2,879	8.45%
2018-2019	24,240	243	1.01%	33,674	941	2.87%	35,545	1,100	3.19%	1,871	5.56%
2017-2018	23,997	184	0.77%	32,733	335	1.03%	34,445	200	0.58%	1,712	5.23%
2016-2017	23,813	(69)	-0.29%	32,398	131	0.41%	34,245	700	2.09%	1,847	5.70%
2015-2016	23,882	358	1.52%	32,267	1,143	3.67%	33,545	900	2.76%	1,278	3.96%
2014-2015	23,524	296	1.27%	31,124	1,691	5.75%	32,645	2,000	6.53%	1,521	4.89%
2013-2014	23,228	290	1.26%	29,433	339	1.17%	30,645	0	0.00%	1,212	4.12%
2012-2013	22,938	164	0.72%	29,094	158	0.55%	30,645	159	0.52%	1,551	5.33%
2011-2012	22,774	40	0.18%	28,936	(393)	-1.34%	30,486	(1,380)	-4.33%	1,550	5.36%
2010-2011	22,734	(2)	-0.01%	29,329	(515)	-1.73%	31,866	(1,170)	-3.54%	2,537	8.65%
2009-2010	22,736	85	0.38%	29,844	119	0.40%	33,036	(1,170)	-3.42%	3,192	10.70%
2008-2009	22,651	49	0.22%	29,725	(714)	-2.35%	34,206	0	0.00%	4,481	15.07%
2007-2008	22,602	1	0.00%	30,439	(406)	-1.32%	34,206	0	0.00%	3,767	12.38%
2006-2007	22,601			30,845			34,206			3,361	10.90%
Average		-0.04%			0.20%				0.07%		8.15%

Heating Season	Firm Peak-Day Sendout			Per Customer Metrics			
	(12)	(13)	(14)	(15)	(16)	(17)	(18)
	Firm Peak-Day Sendout (Dth)	Change from Previous Year	% Change From Previous Year	Excess per Customer [(7) - (4)]/(1)	Design Day per Customer (4)/(1)	Entitlement per Customer (7)/(1)	Peak-Day Send per Customer (12)/(1)
2025-2026	unknown			0.1134	1.4213	1.5346	unknown
2024-2025	29,636	(447)	-1.49%	0.1105	1.4186	1.5291	1.3272
2023-2024	30,083	(603)	-1.97%	0.1283	1.4157	1.5440	1.2177
2022-2023	30,686	808	2.70%	0.1205	1.4183	1.5387	1.2378
2021-2022	29,878	(1,367)	-4.38%	0.1920	1.3917	1.5837	1.2088
2020-2021	31,245	2,794	9.82%	0.1320	1.3888	1.5208	1.2792
2019-2020	28,451	(1,869)	-6.16%	0.1184	1.4010	1.5194	1.1701
2018-2019	30,320	1,679	5.86%	0.0772	1.3892	1.4664	1.2508
2017-2018	28,641	112	0.39%	0.0713	1.3640	1.4354	1.1935
2016-2017	28,529	1,283	4.71%	0.0776	1.3605	1.4381	1.1980
2015-2016	27,246	(1,853)	-6.37%	0.0535	1.3511	1.4046	1.1409
2014-2015	29,099	1,406	5.08%	0.0647	1.3231	1.3877	1.2370
2013-2014	27,693	3,471	14.33%	0.0522	1.2671	1.3193	1.1922
2012-2013	24,222	5,513	29.47%	0.0676	1.2684	1.3360	1.0560
2011-2012	18,709	(4,269)	-18.58%	0.0681	1.2706	1.3386	0.8215
2010-2011	22,978	1,442	6.70%	0.1116	1.2901	1.4017	1.0107
2009-2010	21,536	(1,731)	-7.44%	0.1404	1.3126	1.4530	0.9472
2008-2009	23,267	540	2.38%	0.1978	1.3123	1.5101	1.0272
2007-2008	22,727	852	3.89%	0.1667	1.3467	1.5134	1.0055
2006-2007	21,875			0.1487	1.3648	1.5135	0.9679
Average		2.38%		0.1105	1.3502	1.4607	1.1201

*The Petition is the ninth in which the Company's South District and North District were combined based on the ruling in Docket No. G004/GR-15-879. The Department combined the districts for comparison.

Source: Great Plains Exhibit D

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce

Comments

Docket No. G004/M-25-71

Dated this 2nd day of October 2025

/s/Sharon Ferguson

First #	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Sasha Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		Yes	M-25-71
2	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	M-25-71
3	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	M-25-71
4	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	M-25-71
5	Travis Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	M-25-71
6	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	M-25-71
7	Kristin Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	M-25-71