

January 30, 2026

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

**RE: Letter and Errata from the Minnesota Department of Commerce, Division of Energy Resources (Department) regarding Great Plains Natural Gas Co.'s Petition for Approval of Changes in Contract Demand Entitlement for the 2025-2026 Winter Heating Season**  
Docket No. G004/M-25-71

Dear Ms. Bergman:

On January 28, 2026, the Minnesota Public Utilities Commission (Commission), filed Briefing Papers<sup>1</sup> in the above referenced docket for a Commission Agenda Meeting<sup>2</sup> scheduled to be held on February 5, 2026.

The Department is providing this letter in response to Commission staff comments addressed on page 16 of the Briefing Papers. Specifically, the Commission addresses the following concerns:<sup>3</sup>

- ... Great Plains is proposing an increase in its overall design day compared to 2024–2025. The Department noted a 2.88% increase for Viking supply and a 3.07% overall increase in Great Plains' design day. However, Staff calculated the percent increase as 1.28% for Viking and 0.68% overall for Great Plains, based on use of the appropriate denominator.
- With respect to total demand entitlement quantity, Staff notes that, based on Great Plains' supplemental filing in the 2024-2025 proceeding and the Commission's Order approving the Company's demand entitlement for the prior year, the authorized quantity for the 2024-2025 period is 35,436 Dth/day. Accordingly, the Company's proposed demand entitlement of 34,436 Dth/day for the 2025–2026 period represents a *decrease* of 1,000 Dth/day [footnotes redacted].

Each concern is addressed individually by the Department below.

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<sup>1</sup> *In the Matter of Great Plains Natural Gas Company's Demand Entitlement Filing*, Minnesota Public Utilities Commission, Briefing Papers, January 28, 2026, Docket No. G004/M-25-71, eDocket No. [20261-227487-01](#) (hereinafter "Briefing Papers").

<sup>2</sup> *In the Matter of Great Plains Natural Gas Company's Demand Entitlement Filing*, Minnesota Public Utilities Commission, Notice of Commission Meeting, January 23, 2026, Docket No. G004/M-25-71, eDocket No. [20261-227182-01](#).

<sup>3</sup> Briefing Papers at 16.

A. Design Day Increase from 2024-2025 to 2025-2026 Heating Seasons

The Department appreciates the Commission identifying its mathematical error in Table 2 of the Initial Comments.<sup>4</sup> The Department reviewed the calculations included in the original Table 2 and agrees with the updated information provided in the Briefing Papers . **CORRECTED Table 2** replaces Table 2 that was included in the Department’s Comments.

**CORRECTED Table 2: Great Plains’ Design-Day Levels<sup>5</sup>**

<b>Pipeline &amp; Area</b>	<b>Previous Design-day (Dth/day)</b>	<b>Proposed Design-day (Dth/day)</b>	<b>Change (Dth/day)</b>	<b>Percent Change</b>
Crookston	3,769	3,836	67	1.78%
North-4	10,260	10,373	113	1.10%
<b>Total Viking</b>	<b>14,029</b>	<b>14,209</b>	<b>180</b>	<b>1.28%</b>
South District				
<b>Total NNG</b>	<b>17,649</b>	<b>17,683</b>	<b>34</b>	<b>0.19%</b>
<b>Grand Total</b>	<b>31,678</b>	<b>31,892</b>	<b>214</b>	<b>0.68%</b>

B. Reconciliation of the Great Plains 2025-2026 Demand Entitlement Included in the Current Docket and that was Approved in the G004/24-234 Docket

The Department reviewed Great Plains’ proposed 2024-2025 Demand Entitlements in its 2024-2025 DE filing and notes the following:

- In the Petition, GPNL identified its 2024-2025 total demand entitlement as 38,145 Dk/Day. This estimate assumed Great Plains would execute an additional 4,000 Dk/day of winter-season capacity releases on Viking Gas Transmission (VGT) for the entire 2024-2025 five-month winter heating season for a total of 8,291 Dk/Day of VGT capacity released. This increase in the amount of capacity release on VGT resulted in a net proposed demand entitlement of 34,145 Dk/day.<sup>6</sup>
- In its first Informational Update filing, Great Plains explained that due to delays in construction, the in-service date for the distribution facilities that would allow the load for Wahpeton North Dakota to be served by supply originating in North Dakota would be delayed from November 1 to December 1, 2024. The Company decided to manage

<sup>4</sup> *In the Matter of Great Plains Natural Gas Company’s Demand Entitlement Filing*, Minnesota Department of Commerce, Comments, October 2, 2025, Docket No. G004/M-25-71, eDocket No. [202510-223523-01](#) (hereinafter “Initial Comments”).

<sup>5</sup> The Department created the table from data provided in the demand entitlement filing for Petition Exhibit A.

<sup>6</sup> *In the Matter of Great Plains Natural Gas Company’s Demand Entitlement Filing*, Company, Initial Petition, June 28, 2024, Docket No. G004/M-24-234, eDocket No. [20246-208068-01](#), Exhibit B, page 1 (hereinafter “24-234 Petition”).

the risk associated with this delay by executing monthly capacity release agreements, rather than pursue term agreements for its excess capacity on Viking. This allowed GPNG to release 9,000 Dk/day of capacity on Viking in November 2024 instead of the 8,000 Dk/day estimate it included in the 24-234 Petition. This adjustment resulted in GPNG's November 2024 Demand Entitlement being 33,436 Dk/day for the month of November 2024 rather than the 34,145 Dk/day identified in the 24-234 Petition.<sup>7</sup>

- In its second Informational filing, Great Plains explained that due to weather and operational concerns, it had decided to release only 7,000 Dk/day for December 2024. This adjustment resulted in GPNG's December 2024 Demand Entitlement being 35,436 Dk/day rather than the 34,145 Dk/day identified in the Petition.<sup>8</sup>
- The Department filed its Response to Reply Comments on December 20, 2024. The Department identified the 2024-2025 Demand Entitlement as being 35,436 Dk/day.<sup>9</sup>
- In its third Informational filing, the Company provided information that it had released 8,000 Dk/day of capacity on VGT for the months of January, February and March 2025. These monthly adjustments resulted in GPNG's January, February and March 2025 monthly Demand Entitlements being 34,436 Dk/day. The Company also included an averaging calculation to determine the average amount of capacity released by month for the 2024-2025 Heating season. That average was equal to 34,436 Dk/Day rather than the 34,145 Dk/day identified in the 24-234 Petition.<sup>10</sup>
- Commission Staff submitted briefing papers on May 07, 2025. Staff identified GPNG's 2024-2025 Demand Entitlement as 35,436 Dk/day, consistent with the figure included in the Department's Response to Reply Comments.<sup>11</sup>

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<sup>7</sup> *In the Matter of Great Plains Natural Gas Company's Demand Entitlement Filing*, Company, Informational Update, October 31, 2024, Docket No. G004/M-24-234, eDocket No. [202410-2211495-01](#), Exhibit B, page 1 (hereinafter "First Informational Update").

<sup>8</sup> *In the Matter of Great Plains Natural Gas Company's Demand Entitlement Filing*, Company, Informational Update, November 27, 2024, Docket No. G004/M-24-234, eDocket No. [202411-212513-01](#), Exhibit B, page 1 (hereinafter "Second Informational Update").

<sup>9</sup> *In the Matter of Great Plains Natural Gas Company's Demand Entitlement Filing*, Minnesota Department of Commerce, Response to Reply Comments, December 20, 2024, Docket No. G004/M-24-234, eDocket No. [202412-213275-01](#), page 6.

<sup>10</sup> *In the Matter of Great Plains Natural Gas Company's Demand Entitlement Filing*, Company, Additional Informational Update, November 27, 2024, Docket No. G004/M-24-234, eDocket No. [20253-216303-01](#), page 2 (hereinafter "Third Informational Update").

<sup>11</sup> *In the Matter of Great Plains Natural Gas Co.'s Petition for Approval of Changes in Contract Demand Entitlements for the 2024-2025 Winter Heating Season*, Commission, Briefing Papers, May 7, 2025, Docket No. G-004/M-24-234, eDocket No. [20255-218537-01](#), page 9.

- The Commission met on May 15, 2025 and approve the Petition. The Order was issued on May 19, 2025.<sup>12</sup> The Order approved Great Plains 2024-2025 Demand Entitlement as being the amount amended by Great Plains in its supplemental filing.
- In its Petition in the current docket, Great Plains identified its 2024-2025 and 2025-2026 Demand Entitlements as being 34,436 Dk/Day.<sup>13</sup>
- The Department recommended approval of the Company's proposed 2025-2026 Demand Entitlement.<sup>14</sup>

The Department appreciated Commission Staff's identification of the apparent discrepancy between the Department's 2024-2025 recommended Demand Entitlement in the 24-234 Docket of 35,436 Dk/Day and its recommended Demand Entitlement of 34,436 Dk/Day in this docket. The Department apologizes for not having highlighted the information included in Great Plains March 12, 2025, Informational Update to the Commission previously.

The Department hopes that this explanation has allayed Commission Staff's concern regarding this matter. The Department also notes that it contacted the Company regarding this issue and it appears that the Department and the Company have the same understanding of the course of events. Hence, the Department believes it has provided a reconciliation of the 1,000 Dk/Day difference Commission Staff identified in the Briefing Papers and will not modify any of its existing submissions in this docket.

If the Commission believes a compliance filing from Great Plains is necessary to resolve this issue, the Department does not oppose that requirement.

The Department is available to answer any question the Commission may have in this matter.

Sincerely,

/s/ Sydnie Lieb, Ph.D.  
Assistant Commissioner, Office of Regulatory Analysis

JK/AU/ad

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<sup>12</sup> *In the Matter of Great Plains Natural Gas Co.'s Petition for Approval of Changes in Contract Demand Entitlements for the 2024-2025 Winter Heating Season*, Commission, Order, May 19, 2025, Docket No. G-004/M-24-234, eDocket No. [20255-219059-01](#).

<sup>13</sup> *In the Matter of Great Plains Natural Gas Co.'s Petition for Approval of Changes in Contract Demand Entitlements for the 2025-2026 Winter Heating Season*, Great Plains, Petition, July 1, 2025, Docket No. G-004/M-25-71, eDocket No. [20257-220585-01](#), Exhibit B page 1, (hereinafter "25-71 Petition").

<sup>14</sup> *In the Matter of Great Plains Natural Gas Company's Demand Entitlement Filing*, Department, Response to Reply Comments, December 20, 2025, Docket No. G004/M-25-71, eDocket No. [202511-225005-01](#), page 5.

**Comments Department Attachment 1  
 Docket No. G004/M-24-234  
 Great Plains Demand Entitlement Historical and Current Proposal**

<b>Heating Season</b>	<b>2023-2024</b>	<b>2024-2025</b>			
<b>Contract Type</b>	<b>Quantity (Mcf)</b>	<b>June Filing Quantity (Mcf)</b>	<b>October Filing Quantity (Mcf)</b>	<b>November Filing Quantity (Mcf)</b>	<b>March 2025 Filing Quantity (Mcf)</b>
<u>VGT</u>					
FT-A (12-month)	21,291	21,291	21,291	21,291	21,291
FT-A (5-month)	2,000	2,000	2,000	2,000	2,000
BP (5-month)	-	-	-	-	-
<b>Total Entitlement</b>	<b>23,291</b>	<b>23,291</b>	<b>23,291</b>	<b>23,291</b>	<b>23,291</b>
Seasonal Capacity Release	(4,291)	(8,291)	(9,000)	(7,000)	(8,000)
<b>Net VGT Entitlement</b>	<b>19,000</b>	<b>15,000</b>	<b>14,291</b>	<b>16,291</b>	<b>15,291</b>
<u>NNG</u>					
TFX (12-month)*	3,000	3,000	3,000	3,000	3,000
TFX (5-month)	5,200	5,200	5,200	5,200	5,200
TF12B	3,531	5,129	5,129	5,129	5,129
TF12V	4,004	5,816	5,816	5,816	5,816
TF5	3,410	-	-	-	-
TFX (Capacity Release)	-	-	-	-	-
<b>Total NNG</b>	<b>19,145</b>	<b>19,145</b>	<b>19,145</b>	<b>19,145</b>	<b>19,145</b>
<b>Total Entitlement</b>	<b>38,145</b>	<b>34,145</b>	<b>33,436</b>	<b>35,436</b>	<b>34,436</b>

Source: Great Plains Exhibit B

## **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  
Letter**

**Docket No. G004/M-25-71**

Dated this **30<sup>th</sup>** day of **January 2026**

**/s/Sharon Ferguson**

<b>First # Name</b>	<b>Last Name</b>	<b>Email</b>	<b>Organization</b>	<b>Agency</b>	<b>Address</b>	<b>Delivery Method</b>	<b>Alternate Delivery Method</b>	<b>View Trade Secret</b>	<b>Service List Name</b>	
1	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	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