

December 8, 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, Division of Energy Resources  
Docket Nos. G999/CI-21-135 and G004/M-21-235

Dear Ms. Bergman:

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

*In the Matter of a Commission Investigation into the Impact of Severe Weather in  
February 2021 on Impacted Minnesota Natural Gas Utilities and Customers*

*In the Matter of a Petition by Great Plains Natural Gas Co., a Division of Montana-  
Dakota Utilities Co., for Approval of Rule Variances to Recover High Natural Gas  
Costs from February 2021*

Great Plains filed its 2025 annual compliance filing in this proceeding on August 1, 2025.

The Department recommends the Minnesota Public Utilities Commission **approve with a modification** Great Plain's 2025 annual compliance filing and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. Sydnie Lieb  
Assistant Commissioner of Energy Regulatory Analysis

JK/ad  
Attachment



## Before the Minnesota Public Utilities Commission

### Comments of the Minnesota Department of Commerce

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Docket Nos. G999/CI-21-135 and G004/M-21-235

#### I. INTRODUCTION

The Minnesota Department of Commerce, Energy Division (Department) provides comments on Great Plains Natural Gas Co.'s (Great Plains, GPNG, or the Company) annual compliance filing submitted August 1, 2025, for these two dockets. These two dockets can be thought of as two aspects of the Minnesota Public Utilities Commission's (Commission, MPUC) response to the costs associated with the February 2021 Pricing Event (PE). Docket No. G004/M-21-235 focused primarily on the recovery of the costs resulting from the February 2021 Pricing Event.<sup>1</sup> Docket No. G999/CI-21-135 was more concerned with GPNG's efforts to improve its ability to mitigate the risk of short-term price spikes on a forward-looking basis.

Great Plain's 2025 annual compliance filing (ACF) was less complicated than its 2024 ACF. Natural gas wholesale prices across Minnesota and the Upper Midwest over the 2025-2026 heating season did not demonstrate the short-term price volatility experienced during the January 2024 pricing events. Thus, GPNG didn't have to comply with the additional reporting requirements regarding rapid price increases included in the Commission's 2024 ACF Order which was issued June 2, 2025, and superseded those included in the Minnesota Public Utilities Commission's (Commission) February 17<sup>th</sup>, 2023, Order.<sup>2,3</sup>

The Company did provide information regarding the reporting requirements the Commission listed in in those two orders.

The Commission issued a Notice of Comment (NOC) for GPNG's 2025 ACF on August 11<sup>th</sup>, 2025.

The Commission included the following questions in the NOC:

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<sup>1</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Great Plains Natural Gas Co., a Division of Montana-Dakota Utilities for Rule Variances to Recover High Natural Gas Costs from February 2021*, MPUC, Order, August 30, 2021, Docket Nos. G999/CI-21-135 and G004/M-21-235, (eDockets) [20218-177548-04](#), issued August 30, 2021 (hereinafter "August 30<sup>th</sup> Order").

<sup>2</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Great Plains Natural Gas Co., a Division of Montana-Dakota Utilities for Rule Variances to Recover High Natural Gas Costs from February 2021*, MPUC, Order, February 17, 2023, Docket Nos. G999/CI-21-135 and G004/M-21-235, (eDockets) [20232-193249-01](#), issued February 17, 2023, at Order Pts. 3-11 (hereinafter "February 17<sup>th</sup> Order").

<sup>3</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Great Plains Natural Gas Co., a Division of Montana-Dakota Utilities for Rule Variances to Recover High Natural Gas Costs from February 2021*, MPUC, Order, February 17, 2023, Docket Nos. G999/CI-21-135 and G004/M-21-235, (eDockets) [20256-219485-01](#), issued June 2, 2025, at Order Pts. 5-7 (hereinafter "June 2<sup>nd</sup> Order").

- Does the natural gas utilities annual compliance filings comply with the February 2023 and June 2025 Commission’s Orders?
- Are Great Plains’ conclusions of its voluntary conservation report reasonable?
- Are the gas utilities’ reports regarding interruptible customer compliance and incorporation of curtailment calls reasonable?
- Are the gas utilities’ reports regarding hedging, procurement and customer communication strategies achieving reasonable savings for ratepayers?
- Should the compliance filings be accepted and approved?
- Should the Commission make any changes to future compliance filing requirements?
- Are there other issues or concerns related to this matter?

## II. PROCEDURAL BACKGROUND

February 12 through 22, 2021	A combination of significant disruptions in natural gas supply combined with a sharp rise in natural gas demand, led to an extraordinary increase in natural gas spot market prices in Minnesota. The effects of the price spike were amplified by the closure of the wholesale natural gas markets for the three-day Presidents Day holiday weekend (February 2021 Pricing Event).
August 30, 2021	The Commission issued its ORDER GRANTING VARIANCES AND AUTHORIZING MODIFIED COST RECOVERY SUBJECT TO PRUDENCE REVIEW, AND NOTICE OF AND ORDER FOR HEARING. <sup>4</sup>
October 19, 2022	The Commission issued its ORDER DISALLOWING CERTAIN NATURAL GAS COSTS AND REQUIRING FURTHER ACTION. <sup>5</sup>
February 17, 2023	The Commission issued its ORDER REQUIRING ACTIONS TO MITIGATE IMPACTS FROM FUTURE NATURAL GAS PRICE SPIKES, SETTING FILING REQUIREMENTS, AND INITIATING A PROCEEDING TO ESTABLISH GAS RESOURCE PLANNING REQUIREMENTS. <sup>6</sup>
August 1, 2023	GPNG filed its 2023 ACF. <sup>7</sup>

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<sup>4</sup> August 30<sup>th</sup> Order, (eDockets) [20218-177548-04](#).

<sup>5</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Great Plains Natural Gas Co., a Division of Montana-Dakota Utilities for Rule Variances to Recover High Natural Gas Costs from February 2021*, MPUC, Order, October 19, 2022, Docket Nos. G999/CI-21-135 and G004/M-21-235, (eDockets) [202210-189968-01](#).

<sup>6</sup> February 17<sup>th</sup> Order, (eDockets) [20232-193249-01](#).

<sup>7</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Great Plains Natural Gas Co., a Division of Montana-Dakota Utilities for Rule Variances to Recover High Natural Gas Costs from February 2021*, Great Plains Natural Gas, Compliance, August 1, 2023, Docket Nos. G999/CI-21-135 and G004/M-21-235, (eDockets) [20238-197907-01](#), (hereinafter “2023 ACF”).

November 1, 2023	The Department provided comments on Great Plains 2023 ACF. <sup>8</sup>
January 26, 2024	Great Plains submitted a compliance filing on the cost impacts on gas commodity purchases due to extreme market conditions between January 12 <sup>th</sup> and 16 <sup>th</sup> , 2024. <sup>9</sup>
April 1, 2024	Great Plains filed its final quarterly compliance and tracking filing for the surcharge recovery. <sup>10</sup>
July 30, 2024	The Commission issued an order accepting and approving the Company's 2023 ACF. <sup>11</sup>
August 1, 2024	The Company filed its 2024 ACF. <sup>12</sup>
August 29, 2024	The Commission issued a Notice of Comment period for Great Plains' 2024 ACF. <sup>13</sup>
August 30, 2024	Great Plains filed its Annual True-up Report covering June 2023-2024. <sup>14</sup>

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<sup>8</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Great Plains Natural Gas Co., a Division of Montana-Dakota Utilities for Rule Variances to Recover High Natural Gas Costs from February 2021*, Department, Comments, November 1, 2023, Docket Nos. G999/CI-21-135 and G004/M-21-235, (eDockets) [202311-200161-03-01](#), (hereinafter "2023 Department Comments").

<sup>9</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Great Plains Natural Gas Co., a Division of Montana-Dakota Utilities for Rule Variances to Recover High Natural Gas Costs from February 2021*, Great Plains, Compliance, January 26, 2024, Docket Nos. G999/CI-21-135 and G004/M-21-235, (eDockets) [20241-202743-01](#), (hereinafter "January 2024 Price Spike Filing").

<sup>10</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Great Plains Natural Gas Co., a Division of Montana-Dakota Utilities for Rule Variances to Recover High Natural Gas Costs from February 2021*, Great Plains, Compliance, April 1, 2024, Docket Nos. G999/CI-21-135 and G004/M-21-235, (eDockets) [20244-204816-01](#), (hereinafter "April 2024 Surcharge Recovery Filing").

<sup>11</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Great Plains Natural Gas Co., a Division of Montana-Dakota Utilities for Rule Variances to Recover High Natural Gas Costs from February 2021*, MPUC, Order, July 30, 2024, Docket Nos. G999/CI-21-135 and G004/M-21-235, (eDockets) [20247-209084-02](#), (hereinafter "Order Approving 2023 ACF").

<sup>12</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Great Plains Natural Gas Co., a Division of Montana-Dakota Utilities for Rule Variances to Recover High Natural Gas Costs from February 2021*, Great Plains Natural Gas, Compliance, August 1, 2024, Docket Nos. G999/CI-21-135 and G004/M-21-235, (eDockets) [20248-209166-02](#), (hereinafter "2024 ACF").

<sup>13</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Great Plains Natural Gas Co., a Division of Montana-Dakota Utilities for Rule Variances to Recover High Natural Gas Costs from February 2021*, MPUC, Notice, August 29, 2024, Docket Nos. G999/CI-21-135 and G004/M-21-235, (eDockets) [20248-209854-01](#), (hereinafter "2024 Commission Notice").

<sup>14</sup> *In the Matter of the Review of the 2023-2024 Annual Automatic Adjustment (AAA) Reports and Annual Purchased Gas Adjustment (PGA) True-up Filings, and In the Matter of the Petition of Great Plains Natural Gas Co.'s 2023-2024 Annual True-up Report*, Great Plains, Petition, August 30, 2024, Docket Nos. G999/CI-24-138 and G004/M-24-301, (eDockets) [20248-209913-01](#), (hereinafter "2023-2024 PGA Filing").

December 2-4, 2024	The Department, the Office of the Attorney General Residential Utilities Division (OAG-RUD), and the Citizens Utility Board of Minnesota (CUB) provided comments on GPNG's 2024 ACF. <sup>15, 16</sup>
December 12, 2024	Great Plains and the Citizens Utility Board of Minnesota (CUB) provided reply comments. <sup>17, 18</sup>
March 4, 2025	The Commission issued an Order accepting and approving the Company's 20203-2024 PGA True-up filing. <sup>19</sup>
June 2, 2025	The Commission issued an order accepting and approving the Company's 2024 ACF. <sup>20</sup>
August 1, 2025	The Company filed its 2025 ACF. <sup>21</sup>
August 11, 2025	The Commission issued a Notice of Comment period for Great Plains' 2025 ACF. <sup>22</sup>

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<sup>15</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Great Plains Natural Gas Co., a Division of Montana-Dakota Utilities for Rule Variances to Recover High Natural Gas Costs from February 2021*, OAG-RUD, Comments, December 2, 2024, Docket Nos. G999/CI-21-135 and G004/M-21-235, (eDockets) [20248-209854-01](#), (hereinafter "OAG-RUD 2024 Comments").

<sup>16</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Great Plains Natural Gas Co., a Division of Montana-Dakota Utilities for Rule Variances to Recover High Natural Gas Costs from February 2021*, Department, Comments, December 4, 2024, Docket Nos. G999/CI-21-135 and G004/M-21-235, (eDockets) [202412-212719-01](#), (hereinafter "Department 2024 Comments").

<sup>17</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Great Plains Natural Gas Co., a Division of Montana-Dakota Utilities for Rule Variances to Recover High Natural Gas Costs from February 2021*, Great Plains Natural Gas, Reply Comments, December 12, 2024, Docket Nos. G999/CI-21-135 and G004/M-21-235, (eDockets) [202412-212931-01](#), (hereinafter "2024 GPNG Reply Comments").

<sup>18</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Great Plains Natural Gas Co., a Division of Montana-Dakota Utilities for Rule Variances to Recover High Natural Gas Costs from February 2021*, CUB, Reply Comments, December 12, 2024, Docket Nos. G999/CI-21-135 and G004/M-21-235, (eDockets) [202412-212947-02](#), (hereinafter "2024 CUB Reply Comments").

<sup>19</sup> *In the Matter of the Review of the 2023-2024 Annual Automatic Adjustment (AAA) Reports and Annual Purchased Gas Adjustment (PGA) True-up Filings, and In the Matter of the Petition of Great Plains Natural Gas Co.'s 2023-2024 Annual True-up Report*, Great Plains, Petition, August 30, 2024, Docket Nos. G999/CI-24-138 and G004/M-24-301, (eDockets) [20253-216035-01](#), (hereinafter "Order Approving 2023- 2024 PGA Filing").

<sup>20</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Great Plains Natural Gas Co., a Division of Montana-Dakota Utilities for Rule Variances to Recover High Natural Gas Costs from February 2021*, MPUC, Order, June 2, 2025, Docket Nos. G999/CI-21-135 and G004/M-21-235, (eDockets) [20256-2190485-01](#), (hereinafter "Order Approving 2024 ACF").

<sup>21</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Great Plains Natural Gas Co., a Division of Montana-Dakota Utilities for Rule Variances to Recover High Natural Gas Costs from February 2021*, Great Plains Natural Gas, Compliance, August 1, 2025, Docket Nos. G999/CI-21-135 and G004/M-21-235, (eDockets) [20258-221639-01](#), (hereinafter "2025 ACF").

<sup>22</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Great Plains Natural Gas Co., a Division of Montana-Dakota Utilities for Rule Variances to Recover High Natural Gas Costs from February 2021*, MPUC, Notice, August 11, 2025, Docket Nos. G999/CI-21-135 and G004/M-21-235, (eDockets) [20258-221932-01](#), (hereinafter "2025 Commission Notice").

### III. DEPARTMENT ANALYSIS

The focus of the Department's analysis are based on the Commission's questions included in its NOC. In addition, the Department reconciles the information in the Company's 2025 ACF with the ACF reporting requirements included in the Commission's February 17<sup>th</sup> and June 2<sup>nd</sup> Orders.

#### A. RESPONSES TO COMMISSION'S QUESTIONS

The Department provides its responses to the Commission's questions follow in the order presented in the NOC.

*A.1 Does the natural gas utilities annual compliance filings comply with the Commission's Orders?*

The Department concludes that Great Plains' 2025 Annual Compliance Filing complies with all of the reporting requirements included in the Commission's Orders related to this proceeding.

*A.2 Are Great Plains' conclusions of its voluntary conservation report reasonable?*

The report on voluntary conservation research Great Plains commissioned appears sound. Regarding the reasonableness of the Company's discussions about its monitoring of interruptible customer compliance and incorporation of curtailment calls, the Company's discussion also appears reasonable. As for the Company's discussion regarding the reasonableness of a voluntary conservation program, the Department recommends the Commission approve Great Plains 2025 ACF with the modification identified in Section C.2 which would require Great Plain to file an additional analysis in its 2026 ACF.

*A.3 Are the gas utilities' reports regarding interruptible customer compliance and incorporation of curtailment calls reasonable?*

The Department's review suggests Great Plains' reports regarding interruptible customer compliance and incorporation of curtailment calls are reasonable.

*A.4 Are the natural gas utilities' reports regarding hedging, procurement and customer communication strategies achieving reasonable savings for ratepayers*

The Department's review suggests that Great Plains procurement and communications strategies are providing value and achieving reasonable potential savings to ratepayers.

*A.5 Should the compliance filings be accepted and approved?*

The Department recommends the Commission accept and approve Great Plains' 2025 ACF but include the Department's recommendation from section C.2. regarding the additional analysis associated with any voluntary conservation program.

*A.6 Should the Commission make any changes to future compliance filing requirements?*

The Department didn't identify any future changes but will defer on making a recommendation to Commission until it has the opportunity review comments from other parties.

*A.7 Are there other issues or concerns related to this matter?*

The Department didn't identify any additional issues or concerns related to this matter.

**B. SUMMARY OF CHANGES IN GREAT PLAINS' GAS PRACTICES COMMENTS**

*B.1 Background and Organization*

In a Notice of Comment issued on August 23, 2022, the Commission asked the four affected gas utilities to respond to the two following topics:

- Each impacted natural gas utility is required to review its gas contracting, purchasing, hedging, storage, peak-shaving, interruptible, customer communications and other relevant practices and, by September 15, 2022, file a plan in its respective docket and in CI-21-135 on how it will improve or modify its practices to protect ratepayers from extraordinary natural gas price spikes in the future.
- As part of its plan, each utility shall identify the general timeframe in which it will implement the modifications, and, if the proposed change requires modification of tariff, proposed tariff language.<sup>23</sup>

In its comments responding to that NOC, Great Plains listed three supply-side and two demand-related modifications it used to help mitigate short-term price spikes.

*B.2 Procurement Practices*

As the term suggests, procurement practices focus on contract-related supply options which include baseload, storage and swing-supply/daily purchases and include.

1) Gas Supply Planning –

- a. Baseload - the Company increased its peak winter-month Base Supply during the 2021-2022 Heating Season and planned to purchase Base Supply at a rate of 80% of its

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<sup>23</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Great Plains Natural Gas Co., a Division of Montana-Dakota Utilities for Rule Variances to Recover High Natural Gas Costs from February 2021*, MPUC, Notice, August 23, 2022, Docket Nos. G999/CI-21-135 and G004/M-21-235, (eDockets) [20228-188522-05](#), (hereinafter "2022 Commission Notice").

weather normalized demand. Prior to the February 2021 pricing event, Great Plains' percentage of Base Supply was 50% to 60%.

- b. Storage – the Company modified its storage protocols to using storage more as a price mitigation tool, rather than as an operations tool.
  - c. Day/Spot – the increase in Base Supply and increased flexibility for storage has lowered Great Plains use of this market.
- 2) Hedging – Great Plains had not identified a cost-effective financial hedging strategy that would mitigate exposure to the spot market or daily index prices.
  - 3) Peak Shaving – GPNG's service area is such that the construction of peak shaving facilities is not cost-effective. The Company did have some small peak shaving facilities historically; however, they were retired about a decade ago.

From an economic perspective, the Department would classify those three categories as being related to the supply of natural gas.

### *B.3 Economic Curtailment/Customer Communications*

GNPG identified two demand-related changes:

- 1) Economic Curtailment - the Company developed a proposal in conjunction with the three other rate-regulated gas utilities.
- 2) Customer Communications – Great Plains was evaluating the potential of appeals to customers for voluntary conservation during price spikes and may opt to use this alternative at some point in the future.<sup>24</sup>

These modified practices then formed the basis for the ACF reporting requirements included in the Commission February 17<sup>th</sup> Order.<sup>25</sup>

## *C. ANALYSIS*

### *C.1 Supply-Related Changes*

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<sup>24</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of Great Plains Natural Gas Co., a Division of Montana-Dakota Utilities for Rule Variances to Recover High Natural Gas Costs from February 2021*, Great Plains, Comments, September 15, 2022, Docket Nos. G999/CI-21-135 and G004/M-21-235, (eDockets) [20229-189123-01](#), (hereinafter "Great Plains September 2022 Comments").

<sup>25</sup> A Department review of the Commission Order Points relevant to Great Plains annual compliance filing included #2, #3, #4, #5, #6, #7, #8, and #11.

The Department combined its summary of the Company’s 2023 and 2024 ACF’s since the Commission has approved both filings and discusses the Company’s 2025 ACF separately.

*C.1.1. Gas Supply Planning*

*a. 2023 and 2024 ACFs*

In the Department’s 2024 Comments, it provided the following table listing the percentage of purchases for daily, monthly and stored natural gas for 2020 through 2024.

The changes identified in the table – a much lower percentage of natural gas purchased in the daily market, and a much higher percentage purchased in the monthly market and increases in storage (both of which mitigate short-term price spike risk) is clear.

**Table 1 – Comparison of Forecasted Purchases for the 2020-2021 through 2024-2025 Winter Heating Seasons (%)<sup>26</sup>**

<b>Purchases</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
<b>Daily</b>	47.9%	16.6%	15.4%	6.8%	12.1%
<b>Monthly</b>	44.4%	75.7%	77.1%	85.1%	77.9%
<b>Storage</b>	7.7%	7.7%	7.5%	8.0%	10.1%
<b>Total System Purchases</b>	100.0%	100.0%	100.0%	100.0%	100.0%

*b. 2025 ACF*

*i. Gas Supply Planning and Purchases*

In its 2025 ACF, the Company stated that it had increased its monthly (base supply) purchases to approximately 80 percent during the 2024-2025 winter season.<sup>27</sup>

Order Point 6 the Commission’s February 17<sup>th</sup> Order requires affected utilities to incorporate a greater degree of baseload purchases to reduce reliance on daily spot-market gas.

Hence, the Department concludes the Company is purchasing more baseload gas, consistent with the Commission’s directive and that Great Plains has fulfilled that reporting requirement in its 2025 ACF.

*C.1.2. Storage and Peak Shaving*

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<sup>26</sup> The categories termed “Monthly” and “Daily” are equivalent to “Baseload” and “Spot”.

<sup>27</sup> 2025 ACF, p.2.

Order Point 7 of the Commission’s February 17<sup>th</sup> Order addressed the topic of Great Plains “exploring modifications to storage inventory management that could preserve withdrawal capabilities for later in the winter”.

*a. 2023 and 2024 ACFs*

The Company explained in its January 2024 Price Spike Filing that in the aftermath of the February 2021 pricing event, it had modified its storage plan to preserve storage for use only if there is exposure to high prices or withdrawal schedule must be started to complete storage cycling.<sup>28</sup>

In its Order Approving 2023 ACF, the Commission also required Great Plains to “evaluate the storage service options provided by the interstate pipelines that serve them to determine which storage service option is most appropriate for their situation”.<sup>29</sup>

Great Plains provided this analysis in its 2024 ACF and identified its preferred option.<sup>30</sup>

*b. 2025 ACF*

The Company stated the following regarding storage inventory management:

. . . This storage inventory is now planned for use only when foreseeable pricing events may occur in lieu of taking swing supplies or participating in a high spot market. Gas is strategically held for use only during potential events or until such a date when withdrawals must be taken to cycle gas out of storage. . .<sup>31</sup>

The Department concludes the Company modified its storage inventory management in a consistent manner relative to the Commission’s directive and that Great Plains has fulfilled that reporting requirement in its 2025 ACF.

Great Plains also revisited to the different storage service options Northern Natural Gas (NNG) offers to its customers which it had discussed at length in its 2024 ACF<sup>32</sup> and reiterated its reasoning for selecting the Gas-in-Place (GIP) option.<sup>33</sup>

The Department also recommends the Commission find that Great Plains has complied with the reporting requirements included in Order Point 7 of the Commission’s February 17<sup>th</sup> Order.

*C.1.3. Supply Reserve Margin*

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<sup>28</sup> January 2026 Price Spike Filing, p. 2.

<sup>29</sup> Order Approving 2023 ACF, Order Pt 2.

<sup>30</sup> 2024 ACF p. 2-4.

<sup>31</sup> 2025 ACF, p. 2.

<sup>32</sup> These NNG storage services are also known as Firm Defined Delivery (FDD).

<sup>33</sup> 2025 ACF, p. 2.

Order Point 8 of the Commission’s February 17<sup>th</sup> Order addressed the topic of Great Plains “committing to improve its supply reserve margin to minimize these quantities and explain the level of supply reserve margins in the future”.<sup>34</sup>

*a. 2023 and 2024 ACFs*

Great Plains discussed the topic, noting that it is evaluating its demand forecasts and customer consumption continually.

*b. 2025 ACF*

The Company provided a discussion of the topic, referencing the same items as in its previous annual ACFs.

To the Department’s knowledge, the only avenue for improving GNPG’s reserve margin would be to significantly improve its demand forecasts. Given the Company’s customer make-up and size, this would be a difficult task to perform. Hence, the Department concludes the Company complied with this reporting requirement.

*C.1.4. Hedging Gas Prices via Financial Instruments*

Order Points 5 and 10 of the February 17<sup>th</sup> Order reference this topic. Order Point 5 requires the Company to “explore the availability and cost of contracting, hedging, and supply options for better protection against price spikes”. Order Point 10 is more concerned with any forward-looking gas planning or hedging filings.<sup>35</sup>

*a. 2023 and 2024 ACFs*

Both Great Plains 2023 and 2024 ACF’s included discussions of the Company’s efforts to identify financial hedging instruments that could benefit its ratepayers. In both documents, GPNG stated it had not implemented a financial hedging program due to the lack of financial hedging products that would be cost-effective.<sup>36, 37</sup>

*b. 2025 ACF*

The Company stated in its August 1, 2025, annual compliance filing

Great Plains continues to seek intra-month hedging products from its portfolio of suppliers but has yet to fine a cost-effective product. As a small and highly localized utility, Great Plains has neither the risk tolerance to absorb nor portfolio diversity to mitigate short-duration price spikes through complex hedging strategies.<sup>38</sup>

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<sup>34</sup> February 17<sup>th</sup> Order.

<sup>35</sup> *Ibid.*

<sup>36</sup> 2023 ACF, p. 2.

<sup>37</sup> 2024 ACF, p. 1.

<sup>38</sup> 2025 ACF, p. 1.

Given that the Commission approved the Company's 2023 and 2024 ACFs, the Department concludes the Company's efforts to comply with Order Point 5 in its 2025 ACF is adequate and Great Plains has complied with this reporting requirement. Order Point 10 is not yet relevant to GPNG as it is not proposing to initiate new financial hedging or gas planning programs.

### *C.2. Demand-Related Changes*

This category of tools for short-term price-spike mitigation rests on the concept that customers will either formally (through a tariffed-offering from the utility) or informally (through public appeals or other measures) restrict their usage of natural gas during periods when short-term price spikes occur.

#### *C.2.1. Research Regarding Customer Responses to Conservation Calls*

Order Point 11 of the February 17<sup>th</sup> Order requires the Company to: "design plans that study customer responses to conservation calls."<sup>39</sup>

##### *a. 2023 and 2024 ACFs*

Both Great Plains 2023 and 2024 ACF's included a discussion of the Company's existing practices for interrupting and curtailing customers on its interruptible customers. The 2023 ACF stated that GPNG was planning to retain a consultant to develop a survey for its residential and firm commercial customers.<sup>40</sup>

The 2024 ACF stated the Company had retained a consultant and the consultant had launched residential and commercial surveys during the summer of 2024.<sup>41</sup> The Company provided a copy of the consultant's report in a response to an information request (IR) in late November 2024 and stated it was in the process of reviewing the report.<sup>42</sup>

In its comments regarding GPNG's 2024 ACF, the Department recommended the Commission require GPNG to summarize the consultant's report in its 2025 annual compliance filing.<sup>43</sup> The Commission included this requirement in Order Point 5 of its June 2<sup>nd</sup> Order.

##### *b. 2025 ACF*

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<sup>39</sup> February 17th Order.

<sup>40</sup> 2023 ACF, p. 3.

<sup>41</sup> 2024 ACF, p. 5.

<sup>42</sup> Department 2024 Comments, Attachment A.

<sup>43</sup> *Ibid*, p. 17.

The Company did provide a summary of the consultant's report as well as a copy in its annual compliance filing submitted on August 1, 2025.<sup>44</sup> Hence, the Department concludes the Company has complied with the reporting requirement contained in Order Point 5.

The Department also notes that Great Plains conclusion regarding that report was that GPNG "is not comfortable maintaining safe and reliable service through a voluntary conservation program".<sup>45</sup>

After providing some summary statistics regarding the residential and commercial customer surveys in its 2025 ACF Great Plains stated:

. . . the results of this survey do not support further pursuit of using voluntary conservation by firm customers to offset natural gas purchases. A voluntary conservation program for firm customers lacks the structure required to effectively and confidently manage consumer consumption. . . . A survey cannot reasonably measure the impact of customer fatigue, particularly in the cold climate served by Great Plains. The Company also has concerns that short-term conservation benefits would negate as customers' load increased when thermostat settings return to normal levels. Because of these concerns, Great Plains is not comfortable maintaining safe and reliable service through a voluntary conservation program.<sup>46</sup>

The Department drafted an IR in response to this passage. Department IR #72 asked: "Did Great Plains identify some sort of threshold for the development of a voluntary conservation program for firm customers above which it would pursue a voluntary conservation program before GDS completed its study?"

The Company's response was no.

IR #72 also asked: "Currently, is there any level or combination of customer responses to conservation calls that would result in Great Plains pursuing a voluntary conservation program for its firm customers?"

The Company responded:

As stated in the response to Order Point No . 5, Great Plains appreciates its customers' willingness to consider short-term curtailments; however, the results of this survey do not support further pursuit of using voluntary conservation by firm customers to offset natural gas purchases. A voluntary conservation program for firm customers lacks the structure required to effectively and confidently manage consumer consumption.<sup>47</sup>

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<sup>44</sup> 2025 ACF, p. 4-5, Attachment A.

<sup>45</sup> *Ibid.* p.5.

<sup>46</sup> 2025 ACF, p. 5.

<sup>47</sup> See Attachment DOC-1-C, IR #72.

The Company's response to IR #72 is consistent with the Department's understanding of a natural gas local distribution (LDC) utility's perspective that considers the operational and financial ramifications of such an offering on the LDC's stakeholders. Operationally, a voluntary conservation program would increase the Company's risk of pipeline imbalance penalties and potentially increase the quantities or prices at which Great Plains would need to either purchase or sell already purchased natural gas at the market price. Those costs would usually be borne by ratepayers, but from the Company's perspective, there is always the prudence (disallowance) risk associated with such an effort. Financially, the existence of a voluntary program could also result in a decreased amount of gross margin for the utility if its ratepayers do respond in such a manner as to lower the amount of annual throughput.

The Department believes that an analysis that includes examples of several potential financial/operational outcomes of voluntary conservation program for firm customers under different scenarios would be useful to both the Commission and interested parties. An analysis of several different scenarios that could arise and the magnitude of the financial and operational effects on Great Plains and its ratepayers could potentially resolve the issue of what constitutes a reasonable expectation regarding the potential operational and financial results of the implementation of a voluntary conservation program for firm customers.

The Department recommends the Commission require Great Plains to prepare and file this type of analysis in its 2026 annual compliance filing.

*C.2.2. Curtailment Process Improvements for Economic and Reliability Purposes and Improvement of Interruptible Customer Compliance Efforts*

*a. 2024 ACF*

The OAG-RUD also filed comments and provided recommendations in response to Great Plains 2024 ACF. Specifically, the OAG-RUD recommended the Commission should require that going forward, as part of the annual August 1 price spike mitigation reports, the gas utilities report on how they are (1) improving incorporation of curtailment calls into their gas supply planning processes for both reliability and economic purposes; and (2) improving interruptible-customer compliance with curtailment issues.<sup>48</sup>

CUB submitted reply comments supporting OAG-RUD's recommendations.

In its June 2<sup>nd</sup> Order, the Commission included OAG-RUD's recommendations as Order Points 6, and 7.<sup>49</sup>

*b. 2025 ACF*

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<sup>48</sup> OAG-RUD 2024 Comments, p. 23.

<sup>49</sup> June 2<sup>nd</sup> Order at Order Pt 5.

Regarding the reporting requirements resulting from the Commission's June 2<sup>nd</sup> Order at Order Points 6 and 7, the Company provided some additional information regarding both these topics. The Company stated that its processes allow consumption information and a requirement that interruptible customers recognize they understand the curtailment notification. In addition, the Great Plains noted records are kept regarding customer compliance with the curtailments and customers are contacted directly if needed. The Company also included information regarding the improvement of interruptible customer compliance and concluded by stating that "the absence of noncompliance suggests that no improvement efforts are required at this time".<sup>50</sup>

From the Department's perspective, the information the Company provided regarding those processes is helpful. Great Plains didn't initiate any conservation calls during the 2024-2025 winter season, so there is no information that would allow the Department to evaluate the Company's performance relative to these reporting requirements.<sup>51</sup>

The Department concludes the Company complied with the two Order Points/reporting requirements.

The basis for this conclusion is Great Plains has made efforts in these processes, but the Department cannot evaluate the reasonableness of those efforts if the program hasn't been utilized. Hence, the Department defaults to a conclusion that GPNG's efforts are adequate/reasonable given current information.

*C.3 Reporting Obligations from February 17<sup>th</sup> Order and Order Approving 2023 ACF Not Required for Future ACFs*

*a. Reporting obligations from February 17<sup>th</sup> Order discontinued*

In its reply comments in response to Great Plains' 2024 ACF, CUB recommended requiring the Gas Utilities to continue the reporting obligations initially outlined in Order Points 3, 5-11 and 14-15 of its February 17<sup>th</sup> Order.<sup>52</sup>

Order Point 8 of the Commission's June 2<sup>nd</sup> Order requires the Company to continue the reporting obligations outlined in ordering paragraphs 3, 5-11 and 14-15 of the Commission's February 17, 2023, Order in its future compliance filings.<sup>53</sup>

Thus, the Department concludes that Great Plains was not required to comply with the requirements included in Order Points 1, 2, 4, 12, 13, 16, 17 and 18 of the February 17<sup>th</sup> Order.

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<sup>50</sup> 2025 ACF at p. 5-6.

<sup>51</sup> See Attachment DOC-3.

<sup>52</sup> 2024 CUB Reply Comments, p. 3.

<sup>53</sup> June 2 at Order Pt. 8.

The 2024 ACF Order, the Commission's second order effected by Order Point 8 only included two Order Points. Order Point 1 approved CenterPoint's, Great Plains', MERC's and Xcel's 2023 ACFs. Order Point 2 included the following reporting requirement "evaluate the storage service options provided by the interstate pipelines that serve them to determine which storage service option is most appropriate for their situation".<sup>54</sup>

The Department notes that Great Plains was not required to provide additional information in its 2025 ACF in response to Order Point 2.

Hence, the Department concludes that Great Plains was not required to resubmit or provide additional information regarding its selection of storage service options in its 2025 ACF or any future ACF and the Department has no further comments on this issue.

This ends the Department's review of the Commission's reporting requirements for Great Plains 2025 annual compliance filing in this proceeding.<sup>55</sup> The Department also notes that Department Exhibit No. 1 summarizes the historical and current Commission approved reporting requirements for Great Plains. Department Exhibit No. 1 also provides a citation as to where the Department addressed that order point in its Comments.

*D. REASONABLENESS OF GPNG'S EFFORTS TO MITIGATE THE RISK OF SHORT-TERM NATURAL GAS PRICE SPIKES*

Three of the topics the Commission identified in its 2025 NOC include the term "reasonable".<sup>56, 57</sup> An internet search using the term "reasonableness meaning in law" resulted in the following description:

In legal terms, reasonableness refers to behavior or decisions that align with what an average, prudent person would consider fair or appropriate in a similar situation. It serves as a standard for assessing the fairness and justifiability of actions or decisions, often used in determining liability and conduct in various legal contexts. Essentially, it means doing what a reasonable person would do under the circumstances, ensuring the parties act sensibly and not excessively demanding or harmful.<sup>58</sup>

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<sup>54</sup> Order Approving 2023 ACF.

<sup>55</sup> The Department is not commenting on the topics covered by those Order Points not included in Order Point 8 but included in the February 17<sup>th</sup> Order. Those topics include: 1) Rejection of the economic trigger for interruptible customer curtailment; 2) Updates to existing interruptible tariffs; 3) Participation in the North American Standards Board (NAESB) focused on efforts to improve the force majeure language in the NAESB standard contract; 3) CenterPoint and Xcel-specific reporting requirement regarding peak-shaving decisions, and 4) The finding that natural gas integrated resource planning is in the public interest for CenterPoint Energy of Minnesota, Minnesota Energy Resources Corporation, and Xcel Energy.

<sup>56</sup> 2025 Commission Notice, p. 2.

<sup>57</sup> The three topics refer to GPNG's conclusions regarding the results of its voluntary conservation report, its interruptible customer compliance and curtailment calls, and its strategies for achieving reasonable savings for ratepayers via its hedging, procurement and customer communications processes.

<sup>58</sup> See "[reasonableness meaning in law](#)" search results using Microsoft Copilot and Edge.

The Department's interpretation of this term is that the result of the process changes the Commission required the Company or the Company chose to perform should result in Great Plains acquiring natural gas at prices below those the Company paid for natural gas during the Winter Storm Uri Pricing Event.

*D.1 Reasonableness of GPNG's Hedging, Procurement and Customer Communication Strategies for Achieving Reasonable Savings for Ratepayers, Interruptible Customer Compliance and Incorporation of Curtailment Calls, and Conclusions of Its Voluntary Conservation Report*

*D.1.1. Prices for Natural Gas Purchased during the 2024-2025 Winter Season*

As noted in the Introduction, Great Plains didn't purchase any natural gas during the 2024-2025 winter season that met the Commission's threshold criterion of exceeding five times the gas commodity cost included in the Company's current monthly PGA.<sup>59, 60</sup> Hence, there was no data produced during the 2024-2025 heating season that would allow the Department to estimate the reasonableness of the Company's efforts for this period.

However, Great Plains did experience natural gas prices that met the Commission's threshold criterion of exceeding five times the gas commodity cost included in the Company's monthly PGA during the 2023-2024 heating season.<sup>61</sup>

Fortunately, the weather conditions and the corresponding effects on the supply of natural gas to Minnesota were not as severe during January 2024 Pricing Event as was experienced during the Winter Storm Uri PE.

*D.1.2 Comparison of the Price of Natural Gas Delivered During the January 2024 and February 2021 Pricing Events*

The Company's efforts to mitigate short-term price risk resulted in much lower outlay for gas costs related to the February 2024 PE compared to the January 2021 PE. Table 2 provides that comparison.

**Table 2 – Comparison of Great Plains' Gas Commodity Costs for the February 2021 and January 2024 Pricing Events<sup>62</sup>**

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<sup>59</sup> June 2<sup>nd</sup> Order, at Order Pt 9.

<sup>60</sup> 2025 ACF, p. 1.

<sup>61</sup> January 2024 Price Spike Filing, p. 2.

<sup>62</sup> Department 2024 Comments, p. 13.

Event	Cost/Recovery Mechanism	Amount (\$)	% of Feb 2021 PE Costs
<b>Feb. 2021 PE</b>			
	AAA	\$ 1,624,509	12.9%
	Extraordinary Gas Costs	\$ 10,983,792	87.1%
	Total	\$ 12,608,301	100.0%
<b>Jan. 2024 PE</b>			
	Dailiy Gas Cost greater than 5x PGA	\$ 778,800	6.2%

A comparative analysis of the Company’s efforts compared to that of two of the other three Minnesota rate-regulated gas utilities requesting recovery of high gas costs associated with the January 2021 may also be of value. Table 3 (following page) provides that comparison.<sup>63</sup>

Only MERC demonstrated a lower percentage of costs when comparing the different companies specific gas commodity costs from the February 2021 and January 2024 than Great Plains. The Department included the total costs for each of the pricing events in Table 3 to illustrate the magnitude of the costs associated with the two events.

**Table 3 – Comparison of Great Plains’ Gas Commodity Costs for the February 2021 and January 2024 Pricing Events to CenterPoint, and MERC’s Gas Commodity Costs**

Company	Event	Description	Amount (\$)	% of Feb 2021 PE Costs
<b>Great Plains</b>	Feb. 2021	Total	\$ 12,608,301	NA
	Jan. 2024	Gas Cost greater than 5x PGA	\$ 778,880	6.18%
<b>MERC</b>	Feb. 2021	Total	\$ 75,601,407	NA
	Jan. 2024	Gas Cost greater than 5x PGA	\$ 285,832	0.38%
<b>CenterPoint</b>	Feb. 2021	Total	\$ 466,100,182	NA
	Jan. 2024	Gas Cost greater than 5x PGA	\$ 46,975,064	10.08%
<b>Feb 2021 Total</b>			\$ 554,309,890	
<b>Jan 2024 Total</b>			\$ 48,039,776	8.67%

The Department also asked Great Plains whether it had initiated any significant modifications to the various processes it had used to achieve this result during the 2024 PE in a several information requests (IRs) for the 2025-2026 heating season.<sup>64</sup> The Company’s response to each of those IRs was that it had not modified those processes.<sup>65</sup>

<sup>63</sup> Xcel classified the information in Table 3 as **Trade Secret**. Hence, the Department didn’t include it.

<sup>64</sup> See Attachment DOC-1-C.

<sup>65</sup> *Ibid.* Responses to IRs 66-71 and 73-74.

The combination of the results of the 2024 February PE and the Company's statements that it has not changed its processes for the 2025-2026 heating season support a conclusion that Great Plains' efforts relative to its hedging, procurement and custom communication strategies are reasonable.

As part of its review of GPNG's 2024-2025 winter season results, the Department also asked an IR #63 in which it requested Great Plains to stress-test the 2024-2025 supply portfolio using gas prices and weather conditions like those experienced during the February 2021 PE. The Department believed an analysis of those factors would be useful as a point of comparison for the differences between the two pricing events.<sup>66</sup>

Great Plains did develop a preliminary cost analysis and then provided a list of reasons why the two pricing events could not be compared.

Regarding the comparison of the Company's price mitigation efforts during January 2024 PE, Great Plains noted:

Assuming a 4-day event at similar rates and design day supply requirements, Great Plains would be exposed to \$8.7 million to provide firm service to firm customers during such event.<sup>67</sup>

The result of GPNG's analysis with lower estimated costs in 2024 compared to 2021 provides further support for a conclusion that Great Plains' efforts relative to its hedging, procurement and custom communication strategies are reasonable.

#### *D.2. Reasonableness of GPNG's Interruptible Customer Compliance and Incorporation of Curtailment Calls*

The Department reviewed the Company's discussion of this topic in a previous section and concluded it met the Commission's reporting requirements. From the Department's perspective, the Company's interruptible customer compliance and incorporation of curtailment calls appear reasonable.

#### *D.3. Reasonableness of GPNG's Conclusions of Its Voluntary Conservation Report*

The Department previously recommended the Commission accept GPNG's Voluntary Conservation Report. The Department didn't identify any significant flaws during its brief review of that document. The Department considers Great Plains' response to IR 72 in which the Department asked if the Company identified some sort of threshold for the development of a voluntary conservation program for firm customers prior to GDS completing its report and to which GPNG simply replied "no" to be concerning.

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<sup>66</sup> See Attachment DOC-2-C.

<sup>67</sup> *Ibid.*

The response suggests that there is no scenario under which Great Plains would support the development of this sort of program. If that is truly the case, then the Department would like to see the analysis that Company uses to support this position. The Department posits that the Company's position that it would not pursue a voluntary conservation program under any circumstance in the absence of any analytical support could be considered unreasonable given the absence of analytical support. This conclusion is the basis for the Department recommendation that the Commission require GPNG to provide this type of analysis in its 2026 ACF in Section C.2.

*E. EXTRAORDINARY GAS COST-RECOVERY AND MISCELLANEOUS*

*Recovery of Extraordinary Gas Costs*

The Department concluded that Great Plains has been provided an option for completed cost recovery of the Winter Strom Uri costs in its 2024 ACF comments and has no further comments on this topic.<sup>68</sup>

**IV. RECOMMENDATIONS**

Based on analysis of Great Plains' 2025 ACF and the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the headings/subheadings of Section III subparts A, B, C, D and E.

*A. TOPICS OPEN FOR COMMENT*

The Department:

- A.1 - concludes Great Plains' 2025 ACF complies with the relevant Commission Orders in this proceeding.
- A.2 – concludes Great Plains recommendations regarding its voluntary conservation report as reasonable but requests the Commission approve the Department's recommendation in section C.2 for further study of this issue.
- A.3/A.4 – concludes Great Plains reports regarding hedging, procurement and customer communication strategies are achieving reasonable savings for ratepayers.
- A.5 – recommends the Commission approve Great Plains 2025 ACF with the modification identified in Section C.2.
- A.6 – did not identify any required additional changes to future compliance filing requirements.
- A.7 – did not identify any other issues or concerns related to this matter.

*B. SUMMARY OF GREAT PLAINS' GAS PRACTICES COMMENTS*

The Department has no recommendations for this section.

*C. ANALYSIS*

The Department:

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<sup>68</sup> Department 2024 Comments, p. 17.

- C.1. – recommends the Commission find Great Plains complied with the following reporting requirements in the following sections.
  - C.1.1. – Gas Supply Planning
  - C.1.2. – Storage and Peak Shaving
  - C.1.3. – Supply Reserve Margin
  - C.1.4. – Hedging and Financial Instruments
- C.2. – recommends the Commission approve Great Plains efforts regarding its Interruptible Customer Compliance and Incorporation of Curtailment Calls as well as its Voluntary Conservation Report and require Great Plains to perform an analysis that includes examples of several that includes examples of several potential financial/operational outcomes of voluntary conservation program for firm customers under different scenarios in its 2026 ACF.
- C.3 – The Department has no recommendations for this sub-section.

*D. REASONABLENESS OF GPNG'S EFFORTS TO MITIGATE PRICE SPIKES*

The Department:

- D.1. – recommends the Commission find GPNG's efforts regarding the topics discussed in this section reasonable:
- D.2. - recommends approval of Great Plains efforts regarding Interruptible Customer Compliance and Incorporation of Curtailment Calls.
- D.3. – recommends:
  - *Approval of the Voluntary Conservation Report, but not of Great Plains conclusions.*
  - *Requiring GPNG to an provide additional analysis discussed in Section C.2 in the Company's 2026 ACF .*

*E. EXTRAORDINARY GAS COST RECOVERY*

The Department has no recommendations regarding this section.

Attachments

<b>Title</b>	<b>Description</b>	<b>Topic</b>
DOC-1-C	Department IRs 66-74	GPNG's responses to IRs asked in response to 2025 ACF
DOC-2-C	Department IR 63	GPNG's response to IR 63 asked in response to 2024 ACF
DOC-3-C	Email from Great Plains Staff, December 3, 2025	Email confirming GPNG did not curtail its interruptible customers for economic or reliability purposes during the 2024-2025 winter season.

Exhibits

<b>Title</b>	<b>Description</b>	<b>Topic</b>
Exhibit DOC-1-C	Summary of Past and Current Reporting Requirements	Summary of February 17th Order and June 2nd Order Reporting Requirements



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

**Docket Number:** G004/M-21-235  
**Requested From:** Travis Jacobson, VP/Regulatory Affairs  
Great Plains Natural Gas  
**Type of Inquiry:** General

Nonpublic  Public  
**Date of Request:** 10/28/2025  
**Response Due:** 11/07/2025

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

**Assigned Analyst(s):** John Kundert  
**Email Address(es):** john.kundert@state.mn.us  
**Phone Number(s):** 651-539-1740

**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:** 66  
**Topic:** Processes for Providing Protection Against Price Spikes  
**Reference(s):** August 1, 2025, Annual Compliance Filing, page 1

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**Request:**

1. Has the Company made any significant changes to its processes for providing protection for ratepayers against short-term price spikes over the past 12 months?
2. If applicable, please provide the rationale for those changes and include estimates of the costs and benefits of that effort to ratepayers.

**Response:**

1. Since Winter Storm Uri, Great Plains has modified its approach to contracting base supply, day/spot supply, and has increased its base supply, thereby reducing exposure to potentially volatile day/spot market pricing. However, Great Plains has not made any significant changes to its processes in the past 12 months.
2. Not applicable.

---

To be completed by responder

Response Date: November 7, 2025  
Response by: Travis R. Jacobson  
Email Address: [travis.jacobson@mdu.com](mailto: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-21-235

**Requested From:** Travis Jacobson, VP/Regulatory Affairs  
Great Plains Natural Gas

**Type of Inquiry:** General

Nonpublic  Public

**Date of Request:** 10/28/2025

**Response Due:** 11/07/2025

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

**Assigned Analyst(s):** John Kundert

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

**Phone Number(s):** 651-539-1740

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**Request Number:** 67  
**Topic:** Financial Hedging  
**Reference(s):** August 1, 2025, Annual Compliance Filing, page 1

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**Request:**

1. Has the Company made any significant changes to its processes for hedging some portion of its winter heating season supply using financial instruments over the past 12 months?
2. If applicable, please provide the rationale for those changes and include estimates of the costs and benefits of that effort to ratepayers.

**Response:**

1. Great Plains does not engage in a hedging program.
2. Not applicable.

---

To be completed by responder

Response Date: November 7, 2025

Response by: Travis R. Jacobson

Email Address: [travis.jacobson@mdu.com](mailto:travis.jacobson@mdu.com)

Phone Number: (701) 222-7855



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

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**Request Number:** 68  
**Topic:** Incorporating a Greater Degree of Baseload Purchases  
**Reference(s):** August 1, 2025, Annual Compliance Filing, page 2

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**Request:**

1. Has the Company made any significant changes to its processes for incorporating more baseload purchases into its winter season supply over the past 12 months?
2. If applicable, please provide the rationale for those changes and include estimates of the costs and benefits of that effort to ratepayers.

**Response:**

1. Since Winter Storm Uri, Great Plains has increased its base supply, but has not made any significant changes in the past 12 months.
2. Not applicable.

---

To be completed by responder

Response Date: November 7, 2025

Response by: Travis R. Jacobson

Email Address: [travis.jacobson@mdu.com](mailto:travis.jacobson@mdu.com)

Phone Number: (701) 222-7855



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**Assigned Analyst(s):** John Kundert

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

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**Request Number:** 69  
**Topic:** Modifications to Storage Inventory Management  
**Reference(s):** August 1, 2025, Annual Compliance Filing, page 2

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**Request:**

1. Has the Company made any significant modifications to its storage inventory management processes relative its winter season supply over the past 12 months?
2. If applicable, please provide the rationale for those changes and include estimates of the costs and benefits of that effort to ratepayers.

**Response:**

1. Great Plains continues to utilize its full storage capacity, but has not made any significant changes in the past 12 months.
2. Not applicable.

---

To be completed by responder

Response Date: November 7, 2025

Response by: Travis R. Jacobson

Email Address: [travis.jacobson@mdu.com](mailto:travis.jacobson@mdu.com)

Phone Number: (701) 222-7855



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**Assigned Analyst(s):** John Kundert

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---

**Request Number:** 70

**Topic:** Supply Reserve Margin Minimization Processes

**Reference(s):** August 1, 2025, Annual Compliance Filing, page 3

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**Request:**

1. Has the Company made any significant modifications improvements regarding its efforts to minimize its supply reserve margin over the past 12 months?
2. If applicable, please provide the rationale for those changes and include estimates of the costs and benefits of that effort to ratepayers.

**Response:**

1. Great Plains continually evaluates forecasted load based on the current temperature forecasts up to the time of scheduling deliveries. However, Great Plains has not made any significant changes to this process in the past 12 months.
2. Not applicable.

---

To be completed by responder

Response Date: November 7, 2025

Response by: Travis R. Jacobson

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---

**Request Number:** 71  
**Topic:** Geographic Diversity of Supply  
**Reference(s):** August 1, 2025, Annual Compliance Filing, page 3

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**Request:**

1. Has the Company made any significant changes to its process for increasing the geographic diversity of supply over the past 12 months?
2. If applicable, please provide the rationale for those changes and include estimates of the costs and benefits of that effort to ratepayers.

**Response:**

1. Through structured and long-term transportation contracts with Viking Gas Transmission and Northern Natural Gas, Great Plains is able to take advantage of its access to diverse supply receipts at six locations, but has not made any significant changes in the past 12 months.
2. Not applicable.

---

To be completed by responder

Response Date: November 7, 2025  
Response by: Travis R. Jacobson  
Email Address: [travis.jacobson@mdu.com](mailto: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-21-235

**Requested From:** Travis Jacobson, VP/Regulatory Affairs  
Great Plains Natural Gas

Nonpublic  Public

**Date of Request:** 10/28/2025

**Response Due:** 11/07/2025

**Type of Inquiry:** General

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

**Assigned Analyst(s):** John Kundert

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

**Phone Number(s):** 651-539-1740

**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:** 72  
**Topic:** Customer Responses to Conservation Calls and Summary of Consultant's Report - Great Plains Cold Weather Event Survey  
**Reference(s):** August 1, 2025, Annual Compliance Filing, pages 4-5 and Attachment A

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**Request:**

1. In the summary of the consultant's report, the Company states the survey results don't support the development of a voluntary conservation program for firm customers.
  - a. Did Great Plains identify some sort of threshold for the development of a voluntary conservation program for firm customers above which it would pursue a voluntary conservation program before GDS completed its study?
    - i. If so, please provide this information.
  - b. Currently, is there any level or combination of customer responses to conservation calls that would result in Great Plains pursuing a voluntary conservation program for its firm customers?
2. Is Great Plains planning to perform additional studies regarding customer responses to conservation calls?
3. If applicable, please describe the goal research.

**Response:**

1.
  - a. No.
  - b. As stated in the response to Order Point No. 5, Great Plains appreciates its customers' willingness to consider short-term curtailments; however, the results of this survey do not support further pursuit of using voluntary conservation by firm customers to offset natural gas purchases. A voluntary conservation program for firm customers lacks the structure required to effectively and confidently manage consumer consumption.

---

To be completed by responder

Response Date: November 7, 2025

Response by: Travis R. Jacobson

Email Address: [travis.jacobson@mdu.com](mailto:travis.jacobson@mdu.com)

Phone Number: (701) 222-7855



2. Not at this time.
3. Not applicable.

---

To be completed by responder

Response Date: November 7, 2025  
Response by: Travis R. Jacobson  
Email Address: [travis.jacobson@mdu.com](mailto: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-21-235  
**Requested From:** Travis Jacobson, VP/Regulatory Affairs  
Great Plains Natural Gas  
**Type of Inquiry:** General

Nonpublic  Public  
**Date of Request:** 10/28/2025  
**Response Due:** 11/07/2025

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

**Assigned Analyst(s):** John Kundert  
**Email Address(es):** john.kundert@state.mn.us  
**Phone Number(s):** 651-539-1740

**ADDITIONAL INSTRUCTIONS:**

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---

**Request Number:** 73  
**Topic:** Interruptible Customer Curtailment for Reliability and Economic Purposes  
**Reference(s):** August 1, 2025, Annual Compliance Filing, page 5

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**Request:**

1. Has the Company made any significant changes or improvements to its processes for increasing the use of customer curtailments during price spikes into their gas supply planning processes for both reliability and economic purposes over the past 12 months?
2. If applicable, please provide the rationale for those changes and include estimates of the costs and benefits of that effort to ratepayers.

**Response:**

1. Great Plains has not had the need to increase the use of customer curtailments in the past 12 months. Great Plains plans to address this in greater detail in the Company's next general rate case.
2. Not applicable.

---

To be completed by responder

Response Date: November 7, 2025  
Response by: Travis R. Jacobson  
Email Address: [travis.jacobson@mdu.com](mailto: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-21-235

**Requested From:** Travis Jacobson, VP/Regulatory Affairs  
Great Plains Natural Gas

**Type of Inquiry:** General

Nonpublic  Public

**Date of Request:** 10/28/2025

**Response Due:** 11/07/2025

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

**Assigned Analyst(s):** John Kundert

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

**Phone Number(s):** 651-539-1740

**ADDITIONAL INSTRUCTIONS:**

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---

**Request Number:** 74  
**Topic:** Pipeline Capacity Contracts  
**Reference(s):** None

---

**Request:**

1. Has the Company made any significant changes or improvements to its processes for using its transportation capacity on interstate or in-state pipelines (gas purchased during the heating season using different contract terms) to mitigate the risk of short-term price spikes over the past 12 months?
2. If applicable, please provide the rationale for those changes and include estimates of the costs and benefits of that effort to ratepayers.

**Response:**

1. Great Plains has not made any significant changes to its pipeline capacity contracts in the past 12 months as shown in the DEQ Informational Update in Docket No. G-004/M-25-71.
2. Not applicable.

---

To be completed by responder

Response Date: November 7, 2025

Response by: Travis R. Jacobson

Email Address: [travis.jacobson@mdu.com](mailto: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-21-235

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

**Type of Inquiry:** General

Nonpublic  Public

**Date of Request:** 11/12/2024

**Response Due:** 11/22/2024

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

**Assigned Analyst(s):** John Kundert

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

**Phone Number(s):** 651-539-1740

**ADDITIONAL INSTRUCTIONS:**

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**Request Number:** 63  
**Topic:** Winter Storm Uri Stress Test  
**Reference(s):** Docket No. G999/CI-23-117 CUB Integrated Resource Planning Proposal, filed October 24, 2023, at page 33.

---

**Request:**

In the filing listed, the Citizens Utilities Board recommended that the Gas Utilities stress test the resource portfolios performance and costs with, at a minimum, the following condition;

1. A winter storm screening: an analysis that tests portfolios during the conditions and gas prices like those experienced during Winter Storm Uri.
2. Please provide an analysis that tests the Company's January 2024 supply portfolio using the weather conditions and gas prices like those experienced during Winter Storm Uri.

**Response:**

1. Great Plains contracts such that storage withdrawal plan plus base supply equals 80%<sup>5</sup> of normalized demand. The Company has determined that the exposure between this level of base and the design day firm need is approximately 12,000 dk/day. Great Plains 2024-2025 Swing contracts<sup>6</sup> are weighted 2/3 against Ventura and 1/3 to Demarc. The weighted average Ventura/Demarc rate for February 2021 was \$180.22/dk. Assuming a 4-day event at similar rates and design day supply requirements, Great Plains would be exposed to \$8.7 million to provide firm service to firm customers during such event.
2. Winter Storm Uri occurred during the month of February. Great Plains cannot effectively compare February pricing dynamics to a January 2024 (or any January) portfolio analog for three reasons.

---

<sup>5</sup> Contracting to higher levels of base supply exposes Great Plains to oversupply conditions as experienced during the 2023-2024 heating season.

<sup>6</sup> Swing contracts required to ensure supply is available to serve firm customers.

---

To be completed by responder

Response Date: 11/22/2024

Response by: Travis R. Jacobson

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-21-235

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

**Type of Inquiry:** General

Nonpublic  Public

**Date of Request:** 11/12/2024

**Response Due:** 11/22/2024

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

**Assigned Analyst(s):** John Kundert

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

**Phone Number(s):** 651-539-1740

**ADDITIONAL INSTRUCTIONS:**

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- 
- a. January 2024's normal daily normal delivery is higher than February's normal deliveries. This reduces the amount of base supply contracted in February, both for Great Plains and the general marketplace. Reduced base supply causes larger day market exposure in the event of design day conditions.
  - b. Market conditions entering January 2024 were materially different than February 2021. Entering February 2021, the heating season's NNG-Ventura monthly index averaged \$0.25/dk more than the daily average index. Entering January 2024, the heating season's NNG-Ventura monthly index averaged \$0.70/dk more than the daily average index.
  - c. Since Winter Storm Uri, Great Plains has avoided significant withdrawals during the month of January (unless prices dictate otherwise), to maintain maximum storage withdrawals through mid-February. This strategy changes the base supply position significantly between January and February.

---

To be completed by responder

Response Date: 11/22/2024

Response by: Travis R. Jacobson

Email Address: travis.jacobson@mdu.com

Phone Number: (701) 222-7855

**From:** [Jacobson, Travis](#)  
**To:** [Kundert, John \(COMM\)](#)  
**Subject:** RE: 21-235 Annual Compliance Filing - Informal Question  
**Date:** Wednesday, December 3, 2025 2:46:06 PM  
**Attachments:** [image001.png](#)

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John

I checked and we did not curtail any interruptible customers for reliability or economic reasons during the 2024-2025 heating season.

Travis

---

**From:** Kundert, John (COMM) [john.kundert@state.mn.us](mailto:john.kundert@state.mn.us)  
**Sent:** Wednesday, December 3, 2025 12:25 PM  
**To:** Jacobson, Travis <[travis.jacobson@mdu.com](mailto:travis.jacobson@mdu.com)>  
**Subject:** 21-235 Annual Compliance Filing - Informal Question

**\*\* WARNING: EXTERNAL SENDER. NEVER click links or open attachments without positive sender verification of purpose. DO NOT provide your user ID or password on sites or forms linked from this email. \*\***

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Hi Travis –

I am trying to finish up my comments on Great Plains 2025 annual compliance filing for this docket. I have a question regarding the 2024-2025 winter season. Did Great Plains curtail its interruptible customers for reliability or economic reasons at any point last winter?

Thanks.

John Kundert  
Financial Analyst  
651-539-1740  
[mn.gov/commerce](http://mn.gov/commerce)  
Minnesota Department of Commerce

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



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-Great Plains Natural Gas

Order	Date	Order Point	Topic/Action	Action	Current Status	Great Plains Complied?	DOC Comments Citation
February 17th Order	2/17/2023						
		1	Trigger for Economic Curtailment	Denied	Removed in 2025 ACF Order	Not Applicable (NA)	page 14, footnote 52
		2	Update Existing Interruptible Tariffs	Approved	Removed in 2025 ACF Order	NA	page 14, footnote 52
		3	Fourteen day compliance filing for high gas prices	Approved	Modified in 2025 ACF Order	NA	pages 1 and 16
		4	NAESB - changing force majeure language	Approved	Discontinued in 2025 ACF Order	NA	page 14, footnote 52
		5	Price spike mitigation using contracting, hedging, and supply options	Approved	Active	Yes	page 7 - 10
		6	Incorporation of Additional Baseload Purchases	Approved	Active	Yes	page 8
		7	Storage Inventory Modifications	Approved	Active	Y	pages 8-9
		8	Supply Reserve Margin	Approved	Active	Yes	pages 10
		9	Supply Diversity	Approved	Active - but in Demand Entitlement (DE)	See Docket G004/M-21-71	NA
		10	Forecasted Supply Mixes	Approved	Active - but in DE or Planning	See Docket G004/M-21-71	NA
		11	Research on Customer Responses to Conservation Calls	Approved	Active	Yes	page 11-13
		12	CenterPoint-only reporting requirement on peak-shaving	Approved	Not relevant to Great Plains	NA	NA
		13	Xcel Energy only reporting requirement on peak-shaving	Approved	Not relevant to Great Plains	NA	NA
		14	CPE and Xcel-only reporting requirement on economic dispatch of peak-shaving resources	Approved	Not relevant to Great Plains	NA	NA
		15	Annual compliance filing requirement	Approved	Still required	Yes	procedural
		16	Gas IRP process approved for MERC, CPE and Xcel	Approved	Not relevant to Great Plains/Discontinued in 2025 ACF Order	NA	page 14, footnote 52
		17	Gas IRP budget requirement	Approved	Discontinued in 2025 ACF Order	NA	NA
		18	Procedural	Approved	Still required	Yes	procedural
2023 Compliance	7/30/2024						
		1	Accepting and approving 2023 compliance filings	Approved	Active	Yes	NA
		2	Storage Service Option Evaluations	Approved	Active	Yes	NA
2024 Compliance	6/2/2025						
		1	CenterPoint 2024 ACF	Approved	Not relevant to Great Plains	NA	NA
		2	Great Plains 2024 ACF	Approved	Active	Yes	procedural
		3	MERC 2024 ACF	Approved	Not relevant to Great Plains	NA	NA
		4	Xcel 2024 ACF	Approved	Not relevant to Great Plains	NA	NA
		5	Great Plains report on voluntary conservation and summary	Approved	Active	Yes, but also requesting add'l analysis	page 11-13
		6	Curtailment process improvements for economic and reliability purposes	Approved	Active	Yes	pages 13-14
		7	Interruptible customer compliance with curtailment orders	Approved	Active	Yes	pages 13-14
		8	Procedural	Approved	Identification of Active Reporting Requirements	Yes	pages 14-15
		9	Procedural	Approved	Modification of Reporting Times for Price Spike Event	Yes	pages 1 and 16
		10	Procedural	Approved	ACF - Still required	Yes	2025 ACF

## **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. G999/CI-21-135 and G004/M-21-235**

Dated this **8<sup>th</sup>** day of **December 2025**

**/s/Sharon Ferguson**

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2	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-135Official Service List
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6	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 St. Paul MN, 55101 United States	Electronic Service		No	21-135Official Service List
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9	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	21-135Official Service List
10	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	21-135Official Service List
11	Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
12	Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-135Official Service List
13	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	21-135Official Service List

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15	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	21-135Official Service List
16	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	21-135Official Service List
17	Brian	Edstrom	briane@cupminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	21-135Official Service List
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#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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28	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	21-135Official Service List
29	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	21-135Official Service List
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34	Nicole	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-135Official Service List
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38	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	21-135Official Service List
39	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
40	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	21-135Official Service List
41	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	21-135Official Service List
42	Sarah	Mead	sarah.mead@wecenergygroup.com	MERC		null null, null United States	Electronic Service		No	21-135Official Service List
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46	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
47	Stacey	Murphree	stacey.murphree@centerpointenergy.com	CenterPoint Energy Minnesota Gas			Electronic Service		No	21-135Official Service List
48	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
49	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	21-135Official Service List
50	Carol A.	Overland	overland@legalectric.org	Legaelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	21-135Official Service List
51	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-135Official Service List
52	Lisa	Peterson	lisa.r.peterson@xcelenergy.com			414 Nicollet Mall FL 7 Minneapolis MN, 55401 United States	Electronic Service		No	21-135Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
53	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	21-135Official Service List
54	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	21-135Official Service List
55	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	21-135Official Service List
56	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
57	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	21-135Official Service List
58	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	21-135Official Service List
59	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	21-135Official Service List
60	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
61	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
62	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	21-135Official Service List
63	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
64	Kent	Sulem	ksulem@mmua.org			3131 Fernbrook Ln N Ste 200 Plymouth MN, 55447-5337 United States	Electronic Service		No	21-135Official Service List
65	Casey	Whelan	cwhelan@kinectenergy.com	Kinect Energy Group		605 Highway 169 N Ste 1200 Plymouth	Electronic Service		No	21-135Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55441 United States				
66	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
67	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	21-135Official Service List
68	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		Yes	21-235Official
2	James H.	Barkley	james.barkley@bakerbotts.com	Baker Botts		910 Louisiana Street Houston TX, 77002-4995 United States	Electronic Service		Yes	21-235Official
3	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 St. Paul MN, 55101 United States	Electronic Service		No	21-235Official
4	Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		Yes	21-235Official
5	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	21-235Official
6	Barbara	Case	barbara.case@state.mn.us		Office of Administrative Hearings	600 N. Robert St. St. Paul MN, 55101 United States	Electronic Service		No	21-235Official
7	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	21-235Official
8	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	21-235Official
9	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	21-235Official
10	Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY		401 Nicollet Mall FL 8 Minneapolis MN, 55401 United States	Electronic Service		Yes	21-235Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
11	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	21-235Official
12	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 United States	Electronic Service		Yes	21-235Official
13	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		Yes	21-235Official
14	Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		Yes	21-235Official
15	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		Yes	21-235Official
16	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	21-235Official
17	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	21-235Official
18	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-235Official
19	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	21-235Official
20	Lisa	Peterson	lisa.r.peterson@xcelenergy.com			414 Nicollet Mall FL 7 Minneapolis MN, 55401 United States	Electronic Service		No	21-235Official
21	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee	Electronic Service		Yes	21-235Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						WI, 53203 United States				
22	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	21-235Official
23	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		Yes	21-235Official
24	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	21-235Official
25	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		Yes	21-235Official
26	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	21-235Official
27	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	21-235Official
28	Michael A.	Yuffee	michael.yuffee@bakerbotts.com	Baker Botts		700 K St NW Washington DC, 20001 United States	Electronic Service		Yes	21-235Official