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May 7, 2020

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 East Seventh Place, Suite 350
St. Paul, MN 55101-2147

RE: Docket No. G004/M-20-395
Reply Comments to the Comments of the Minnesota Department of Commerce, Division
of Energy Resources

Dear Mr. Seuffert:

Great Plains Natural Gas Co. (Great Plains), a Division of Montana-Dakota Utilities Co., herewith electronically files its Reply Comments to the Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) filed on April 30, 2020.

In its comments regarding the 2019 Gas Affordability Report submitted by Great Plains, the Department recommends that the Commission accept the Company's report and approve Great Plains' request to adjust its Gas Affordability Program (GAP) surcharge rate and correspondingly increase its annual GAP budget, with the understanding that the administrative costs included in the tracker reflect actual administrative costs incurred, up to the 5% limit set by Minnesota Statutes 216B.16, subd. 15.

Great Plains agrees with the Department's recommendations. Great Plains confirms that only actual administrative costs, up to the 5% limit set by Minnesota Statutes 216B.16, subd. 15 are included in the tracker. Great Plains' only charges the fee paid to its 3rd party administrator, the Salvation Army, to the GAP tracker which is less than 5% of the total program costs.

Great Plains also clarifies, in response to the Department's comments at page 4, it has fully complied with the Commission's September 28, 2018 Order regarding disconnection rate reporting and that the Company's disconnection rates included in its 2019 GAP report reflect non-LIHEAP residential customers only and not non-LIHEAP firm (including C&I) customers.

If you have any questions regarding this filing, please contact Travis R. Jacobson at (701) 222-7855, or Brian Meloy, at (612) 335-1451.

Sincerely,

/s/ Travis R. Jacobson

Travis R. Jacobson
Director of Regulatory Affairs