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March 31, 2021

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

**RE: *Petition for Approval of Great Plains Natural Gas Co. Annual Gas Affordability Program Report, Docket No. G004/M-21-\_\_\_\_\_***

Dear Mr. Seuffert:

Great Plains Natural Gas Co. (Great Plains), a Division of Montana-Dakota Utilities Co., herewith electronically files its Calendar Year 2020 Gas Affordability Program (GAP) Report in compliance with Minnesota Statute § 216B.16, Subd. 15 and the Commission's July 25, 2016 Order in G-004/M-16-that directed the Company to continue to file a compliance report by March 31 of each year.

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

Sincerely,

*/s/ Travis R. Jacobson*

Travis R. Jacobson  
Director of Regulatory Affairs

STATE OF MINNESOTA  
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie Sieben	Chair
Joseph Sullivan	Vice-Chair
Valerie Means	Commissioner
John Tuma	Commissioner
Matt Schuerger	Commissioner

In the Matter of the Petition of Great Plains Natural Gas Co., a Division of Montana-Dakota Utilities Co., for Approval of the 2020 Gas Affordability Program Report and Updated GAP Surcharge	)	)	)	)	)
			Docket No. G004/M-21-_____		

**SUMMARY OF FILING**

Great Plains Natural Gas Co. (Great Plains), a Division of Montana-Dakota Utilities Co., hereby submits this Petition for approval of the Company's 2020 Gas Affordability Program (GAP) Report in compliance with Minnesota Statute § 216B.16, Subd. 15 and Orders issued by the Minnesota Public Utilities Commission (Commission) in Docket Nos. G-004/M-07-1235, G-004/M-15-306, G-004/M-16-275, G-004/M-17-254, G-004/M-18-248, G-004/M-19-247 and G004/M-20-395. Great Plains respectfully requests that the Commission accept its 2020 Gas Affordability Program Report as being in compliance with its directives.

STATE OF MINNESOTA  
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie Sieben	Chair
Joseph Sullivan	Vice-Chair
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)  
) Docket No. G004/M-21-\_\_\_\_\_  
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**PETITION FOR APPROVAL OF GREAT PLAINS NATURAL GAS CO.'S GAS AFFORDABILITY PROGRAM REPORT FOR PROGRAM YEAR 2020**

**I. INTRODUCTION AND SUMMARY**

Great Plains Natural Gas Co. (Great Plains), a Division of Montana-Dakota Utilities Co., hereby submits this Petition to the Minnesota Public Utilities Commission (Commission) for approval of the Company's Gas Affordability Program Report for calendar year 2020 pursuant to Minnesota Statute § 216B.16, Subd. 15 and Orders issued by the Commissions in Docket Nos. G-004/M-07-1235, G-004/M-15-306, G-004/M-16-275, G-004/M-17-254, G-004/M-18-248, G-004/M-19-247 and G004/M-20-395.

**II. BACKGROUND**

Great Plains' Gas Affordability Program (GAP) was approved by the Commission in Docket No. G004/M-07-1235 by Order issued on May 12, 2008 and Order issued on September 29, 2015 in Docket No. G-004/M-15-306 extending GAP through program year

2016. In Docket No. G-004/M-16-275 the Commission ordered Great Plains to continue to file a compliance report by March 31 of each year and program evaluations periodically.

On June 1, 2016 Great Plains filed its Gas Affordability Program Evaluation Report in Docket No. G-004/M-16-495. On July 27, 2016, the Commission issued its *Order Extending Expiration Date of Gas Affordability Programs* extending the termination date of Great Plains' GAP to June 30, 2017. On May 22, 2017, the Commission issued an Order in Docket No. G-004/M-16-495 requiring Great Plains to start reporting its GAP performance based on one-hundred percent of the customers enrolled in both LIHEAP and GAP and one-hundred percent of the customers only enrolled in LIHEAP<sup>1</sup>. The Commission also approved the Company's request to reinstate a GAP surcharge at a rate of \$0.01393 per dekatherm effective with service rendered on June 1, 2017. The Commission approved the Company's request in its May 22, 2017 Order.

On June 20, 2018, Great Plains' 2017 GAP report was approved by the Commission in Docket No. G-004/M-18-248. On August 19, 2019, Great Plains' 2018 GAP report was approved by the Commission in Docket No. G-004/M-19-247. The \$0.01393 GAP surcharge was approved to continue at its current rate in the Commission's January 17, 2020 Order on Great Plains' Evaluation Report in Docket No. G-004/M-19-366. The Commission also determined that Great Plains' GAP programs should continue with no expiration date.

On March 31, 2020, Great Plains filed its 2019 GAP report which included a request to increase its GAP funding to \$70,000 annually and increase GAP surcharge to \$0.02295 per Dk. The Commission approved Great Plains' 2019 GAP Report, including the \$70,000

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<sup>1</sup> Great Plains was previously reporting several GAP metrics based on a sample of customers enrolled in LIHEAP and/or GAP as applicable pursuant to the Commission's Order issued in Docket No. G-004/M-07-1235.

annual funding and GAP surcharge rate of \$0.02295 per Dk on November 5, 2020 in Docket No. G004/M-20-395. On November 9, 2020, the Company submitted its Compliance Filing pursuant to the Commission's November 5, 2020 Order, noting an effective date of December 1, 2020 for the new GAP surcharge rate.

In Docket No. G-004/M-16-495 the Commission required Great Plains, Xcel Energy and CenterPoint Energy and the Department to participate in a stakeholder working group to discuss Gas Affordability Programs and whether changes should be made to the programs. Utilities, third party administrators and the Department convened to discuss and make recommendations regarding GAP. On May 22, 2018 the stakeholder report was filed with the Commission. The utilities did not suggest changes to the GAP, however proposed the use of a streamlined format for annual reporting using a form developed by the Department. On September 28, 2018 the Commission issued an Order accepting the Utilities Stakeholder report as filed and adopting the use of a streamlined reporting format for annual reports using the form developed by the Department.

Great Plains' GAP is available to those customers who (1) have been qualified and receive assistance from the Low-Income Home Energy Assistance Program (LIHEAP); (2) agree to be placed on a levelized payment plan; and (3) agree to a reasonable payment schedule. The GAP is designed to assist qualified low-income residential customers to manage and pay their natural gas bills through the establishment of a new affordability bill credit and arrearage forgiveness in certain circumstances.

The Affordability Component consists of a bill credit available to Qualified Customers to help offset the costs of natural gas service. The bill credit is equal to one-twelfth of the difference between the Company's estimate of the Qualified Customer's annual gas bill and

4 percent of the Qualified Customer's household income as provided by the Qualified Customer to Great Plains.<sup>2</sup>

The Arrearage Forgiveness Component of Great Plains' GAP consists of a monthly credit that is applied each month after receipt of the Qualified Customer's payment. The credit is designed to retire arrears over a period of up to twenty-four months, with Great Plains matching the Qualifying Customer's contribution to retiring arrears.

Through Program Year 2010, Great Plains administered its own GAP, while working actively with community action partnership agencies. This required Great Plains to review current billing and consumption information, approved LIHEAP benefits and household income information submitted to Great Plains to determine a Qualified Customer's payment schedule amount.<sup>3</sup> Effective with Program Year 2011, Great Plains entered into an agreement with West Central MN Communities Action, Inc. (West Central) to serve as the third-party administrator of its GAP. The Commission approved West Central as the third-party administrator of Great Plains' GAP by Order dated March 30, 2011. In November 2014, Great Plains signed an agreement with The Salvation Army, Roseville, Minnesota to administer Great Plains' GAP. Great Plains advised the Commission of this change in its compliance filing submitted on January 16, 2015 in Docket No. G-004/M-07-1235. In October 2020, Great Plains renewed its agreement with The Salvation Army to include the

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<sup>2</sup> Pursuant to the Commission's Order issued in G-004/M-10-322 on September 30, 2010, Great Plains was authorized to lower the income threshold to qualify for the Affordability Component to 4 percent. Effective with applications received for Program Year 2011, the 4 percent income threshold was utilized to determine if a customer qualifies for the Affordability Component.

<sup>3</sup> A Qualified Customer's payment schedule includes both payment of the customer's current month's bill (which reflects one-twelfth the levelized payment plan), after inclusion of the affordability bill credit, and payment of a portion of the Qualified Customers pre-program arrears.

updated \$70,000 annual funding approved by the Commission starting with the 2021 GAP program year.

**III. GENERAL FILING INFORMATION**

Pursuant to Minn. Rules Part 7825.1300, Subpart 3, Great Plains provides the following general information:

Utility:	Great Plains Natural Gas Co. A Division of Montana-Dakota Utilities Co.
Company's Attorney:	Brian M. Meloy Stinson LLP 50 South Sixth Street, Suite 2600 Minneapolis, MN 55402-1540 Telephone: 612-335-1451
Date of Filing	March 31, 2021
Proposed Effective Date	May 31, 2021
Controlling Statute for Time in Processing the Filing	NA
Utility personnel authorizing the filing and to whom copies of correspondence, pleadings and notices should be sent	Travis R. Jacobson Director of Regulatory Affairs Great Plains Natural Gas Co. 400 North 4 <sup>th</sup> Street Bismarck, ND 58501

**IV. DESCRIPTION OF FILING**

**A. Petitioner**

Great Plains is a Minnesota public utility as defined in Minn. Stat. § 216B.02, Subd. 4 and operates as a Division of Montana-Dakota Utilities Co. Great Plains is engaged in business as a natural gas local distribution company serving 18 communities in Minnesota and one community in North Dakota. Great Plains currently provides natural gas utility

service to approximately 22,324 Minnesota customers and 2,320 customers in North Dakota.

In compliance with the Commission's directives, Great Plains provides its Calendar Year 2020 Gas Affordability Program Report covering the period January 1, 2020 through December 31, 2020. The streamlined reporting format approved in the Commission's September 28, 2018 Order in Docket No. G-004/M-16-495 is provided as Attachment A.

**V. 2020 ANNUAL GAP REPORT**

Please see Attachment A for the following information for reporting years 2018-2020.

**1. Program Dates and Status (Lines 1-9)**

Great Plains' GAP is approved on a permanent basis and continues to be administered by The Salvation Army in Roseville, MN. Great Plains will be filing its next Evaluation Report for GAP by May 31, 2022.

**2. Participant Benefits (Lines 10-17)**

As noted previously, the maximum payment as a percentage of household income is set to 4% and the repayment period for the arrearage forgiveness program is set at twenty-four months. The average annual income per GAP participant was \$13,502 in 2020 and the average annual bill was \$708. This compares to \$14,477 and \$735 in 2019. This difference in the average annual bill was primarily driven by warmer weather. The average arrearage balance per participant was \$60 in 2020.

The average affordability benefit was \$232 and the average annual arrearage forgiveness benefit per customer was \$83 resulting in an average total benefit per participant of \$227. GAP customers' average annual affordability benefit and the average total benefit increased in program year 2020 from the average benefit received in 2019 by 7% and 4%,



respectively. GAP customers' average arrearage forgiveness benefits per customer decreased 3% in program year 2020 from the average arrearage forgiveness in program year 2019.

### **3. Cost and Cost Recovery (Lines 18-23)**

Great Plains' annual budget for GAP was \$50,000 for program year 2020. Revenue collected from January through December 2020 under the Commission authorized GAP rates was \$39,702.46.

Great Plains dispersed \$50,194.87 for affordability and arrears credits and paid a third-party administrative fee of \$2,750. The tracker balance as of year-end 2020 is a negative \$19,249.06.

The annual cost of the surcharge for an average residential customer who used 90 dekatherms of gas per year increased to \$1.32 for Program Year 2020. This reflects the surcharge of \$0.01393 that was effective for the months of January through November and the updated surcharge of \$0.02295 that was applicable to the month of December only as authorized in Docket No. G004/M-20-395.

In the Company's 2019 GAP Annual Report, Great Plains requested Commission approval to increase its GAP funding to \$70,000 annually with an increase in the GAP surcharge of \$0.00902 for a GAP surcharge rate of \$0.02295 per dk. On November 5, 2020, the Commission approved the Company's request to increase the Company's GAP budget and surcharge rate in Docket No. G004/M-20-395 by Commission Order issued on November 5, 2020. The new GAP surcharge rate was implemented December 1, 2020. Great Plains anticipates recovering the deficit that occurred in the 2020 GAP Program year in the GAP 2021 Program year.

#### **4. Participation (Lines 24-28)**

Factors contributing to the number of applicants not qualifying for GAP in 2020 include:

- 1) Either denied LIHEAP or LIHEAP application was never submitted by the customer.
- 2) Customers applying for program but not qualifying for an arrears forgiveness or affordability credit.

Qualifying applicants not eligible for the affordability credit or the arrearage forgiveness credit were offered the option to enter a levelized payment plan. In 2020, Great Plains continued the process of contacting customers that received LIHEAP benefits effective October 1, 2019 and were identified as being in arrears to encourage them to apply for GAP. Throughout the year, Great Plains also re-evaluated customers that had previously submitted a 2020 GAP application, however, did not qualify for the arrears benefits at the time of application. Those customers were contacted and advised that they could qualify for the arrears credit and were eligible to enroll in the program.

In calendar year 2020, Great Plains received 329 GAP applications representing a decrease of 35 percent from calendar year 2019, while LIHEAP applications submitted in 2020 for Great Plains' customers decreased 10 percent from the number of LIHEAP applications received in 2019. Some of the decrease from calendar year 2019 can be attributed to a delay in approval of LIHEAP applications which, in turn, will cause a delay in GAP application approvals as LIHEAP approval is a qualifier for GAP participation. The Company understands measures have been implemented to address the delay in LIHEAP application approvals.

Of the 329 applications received, 224 customers were ultimately enrolled in GAP qualifying for an affordability credit and/or arrearage forgiveness credit. A significant change made when evaluating applications starting with the 2018 GAP program and continuing through 2020 was that all LIHEAP or other assistance funds were considered customer payments.

This change allowed:

- 1) More applicants to qualify for the program and not be removed from the program for not making each monthly payment or missing two monthly payments in a row because of the credit balance typically carried once the LIHEAP payment is applied.
- 2) It also qualified customers for the arrears forgiveness when previously the customers' LIHEAP funds may have paid their arrears balance owing at the time of application and therefore disqualifying customers from that portion of the program.

As shown on Attachment A, Line 24 the number of LIHEAP customers that participated in GAP in 2020 was again 19 percent in 2020, the same percentage as in 2019. Great Plains retained customers in GAP in 2020 at a percentage of 84%, compared to 78% in 2019. Great Plains did not have a waiting list to participant in GAP during program year 2020.

#### **5. Impact on Disconnect Rates (Lines 29-33)**

Great Plains suspended disconnections in March of 2020 due to the COVID-19 pandemic in response to Minnesota Governor Tim Walz's Emergency Executive Order 20-01 issued on March 13, 2020 whereby a peacetime emergency was declared in order to protect Minnesotans from COVID-19. The State of Minnesota remains under the peacetime emergency order at the time of this report. As the end of the Cold Weather Rule period

extended into the start of the Governor's peacetime emergency, which remains in effect to date, there were no residential disconnections due to non-payment in the state of Minnesota in calendar year 2020. As such, there is no impact on disconnection rates to include in this 2020 GAP Program year report.

**6. Impact on Payment Frequency-Dollars Paid Divided by Dollars Requested (Lines 34-38).**

GAP participants paid a larger percentage of the dollars requested as compared to the Non-GAP/LIHEAP customer group. The Non-GAP/Non-LIHEAP Residential customers paid the greatest percentage of dollars requested. Overall, each customer group had lower frequency of payments than in 2019, primarily due to the COVID-19 pandemic. When evaluating the 2020 GAP participants dollars paid to dollars requested before they were enrolled in GAP shows an improvement when enrolled in GAP, not as significant as results in 2019 GAP, which would be explained by the COVID-19 pandemic.

**7. Number of Payments Made Divided by the Number of Payments Requested (Lines 39-43).**

GAP participants made a higher percentage of the payments requested as compared to the Non-GAP/LIHEAP group. The Non-GAP, Non-LIHEAP Residential group made the highest percentage of payments requested of these three groups. Enrolling in GAP also shows that when customers are enrolled in the program they make a higher percentage of payments requested than those in LIHEAP but not participating in GAP.

**8. Impact on Arrears (Lines 44-48)**

The GAP participant group had a lower number of accounts with an arrears balance of 13 percent as compared to the Non-GAP LIHEAP group at 24 percent. Non-GAP/Non-

LIHEAP customers had the lowest percentage of accounts in arrears. When comparing the average debt amount of each group in arrears, GAP participants average arrears balance was \$59.86, Non-GAP LIHEAP group was \$151.34, and Non-GAP, Non-LIHEAP Residential customers average arrears balance owing was \$176.76. Thirty-seven percent of the 2020 GAP participants coming into the program had an arrears balance, compared with thirteen percent at year end.

**9. Dollar Amount of Arrears % Change (Lines 49-53)**

The Non-GAP/Non-LIHEAP customers experienced an increase in the average dollar amount of arrears balance owing. The GAP participants experienced a decrease in the average dollar amount of arrears balance owing. Lines 52-53 show that GAP participants had an average arrears balance of \$116.24 prior to their enrollment in GAP and \$59.86 at the end of December 2020.

**10. Type and number of customer complaints (Lines 54-55)**

Great Plains did not receive any customer complaints regarding the GAP program in 2020.

**11. Retention (Line 56)**

The retention rate for GAP participants in program year 2020 was 84%. This can be attributed to the program change made in 2018 and 2019 that considered LIHEAP payments as customer payments.

**12. Impact on collection activity (Lines 57)**

As demonstrated in prior program years and current program year, Great Plains customers that participate in GAP have a lower than average arrears balance owing which has a positive impact on collection activity by reducing the need for such activities. A Great

Plains' consumer specialist works daily with the Company's credit representatives to identify customers whose accounts are in a collection status, who qualified for LIHEAP in the current heating season and who currently are not enrolled in the current year's GAP. Great Plains reaches out to this group of customers to promote and educate customers to advise about the program and how to apply.

### **13. Coordination with other programs (Line 58)**

Great Plains coordinates and communicates with all agencies providing bill payment assistance in its service territory. The goal is to provide all necessary materials and training to these agencies, so they are knowledgeable and willing to promote GAP to all Great Plains customers, resulting in more GAP participants. Great Plains has established a good working relationship with other agencies in Great Plains' service territory which was again evident as case workers for all assistance agencies did contact Great Plains to advise that they had discussed GAP with customers specifically those applying for crisis assistance as well as apply for heating assistance.

Great Plains' outreach efforts include: direct mailing to all customers that received heating assistance in previous heating seasons, posting of the application on Great Plains' and third-party administrator's websites, and billing inserts to customers advising of GAP. Inserts are included with monthly bills throughout the winter season, providing information regarding where to apply and contact information for questions. Information and applications forms were also provided to all energy assistance agencies in Great Plains' service territory and Great Plains has adopted the practice to discuss GAP with customers that apply for the Cold Weather Rule protection.

## **VI. Overall Evaluation**

In Docket No. G-004/M-20-395, Great Plains requested to increase its annual funding of GAP to \$70,000 and to increase its surcharge rate to \$0.02295 per dk, due to increased participation in its GAP in 2019. The Commission approved Great Plains' request in its Order issued November 5, 2020 with the new surcharge rate implemented December 1, 2020. With only one month of the GAP year reflected in revenues collected under the GAP surcharge, the Company anticipates a reduction in the under-recovered balance in the 2021.

The COVID-19 pandemic has also impacted aspects of the reportable sections of the annual GAP report. Applications for LIHEAP assistance and for the Company's GAP has decreased in 2020 compared to 2019, with a reduction of 10% and 35% respectively. All three groups, GAP participants, Non-GAP LIHEAP customers, and Non-LIHEAP residential customers have also seen a reduction of payment frequency. It is possible that without the threat of disconnection due to non-pay there is a lesser sense of urgency for customers to pay their utility bills. The Company anticipates when collection activities resume there will be a corresponding increase in the requests for energy assistance options by the Company's customers.

In discussions with the Company's Consumer Specialist and the local agencies that process LIHEAP applications in Great Plains' Minnesota service territory, there is a lag in agency response to process these application due to high demand and customers who are not fully completing the needed paperwork, which further delays the process as the local agency works with the customer to obtain the needed paperwork to be approved for LIHEAP. The Company believes this lag has had a corresponding effect on the number of customers participating in GAP.

**VII. The Proposal**

Great Plains respectfully requests that the Commission accept its 2020 Calendar Year Gas Affordability Program Report.

**Dated: March 31, 2021**

**Respectfully Submitted,**

*/s/ Travis R. Jacobson*

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Travis R. Jacobson  
Director of Regulatory Affairs  
Great Plains Natural Gas Co.  
a Division of Montana-Dakota Utilities Co.  
400 N. 4<sup>th</sup> Street  
Bismarck, ND 58501



GREAT PLAINS NATURAL GAS CO.  
GAS AFFORDABILITY REPORTING 2020

Information as required and approved in September 28, 2018 Order-Docket No. G-004/M-16-495

Section	Lines	2018	2019	2020
<b>1</b>	<b>Program Dates and Status:</b>			
	1 Date program started	1/1/2018	1/1/2019	1/1/2020
	2 Program effective date	1/1/2018	1/1/2019	1/1/2020
	3 Date next evaluation report due	5/31/2019	5/31/2022	5/31/2022
	4 Date last evaluation completed	6/1/2016	5/31/2019	5/31/2019
	5 Last evaluation docket number	G-004/M-16-495	G-004/M-19-366	G-004/M-19-366
	6 Status of program (pilot or permanent)	Permanent	Permanent	Permanent
	7 Date pilot program ends, if applicable	N/A	N/A	N/A
	8 Date of last Evaluation Order	5/22/2017	1/17/2020	1/17/2020
	9 Program administrator	The Salvation Army	The Salvation Army	The Salvation Army
<b>2</b>	<b>Participant benefits</b>			
	10 Description of affordability benefit - maximum payment as % of household income	4%	4%	4%
	11 Description of arrearage forgiveness benefit - repayment period	Up to 24 Months	Up to 24 Months	Up to 24 Months
	12 Average annual income per participant	\$13,900	\$14,477	\$13,502
	13 Average annual bill per participant	\$642	\$735	\$708
	14 Average arrearage balance per participant	\$138	\$178	\$60
	15 Average annual affordability benefit per participant	\$171	\$216	\$232
	16 Average annual arrearage forgiveness benefit per customer	\$56	\$86	\$83
	17 Average total benefit per participant	\$159	\$218	\$227
<b>3</b>	<b>Cost and Cost Recovery</b>			
	18 Annual budget	\$50,000.00	\$50,000.00	\$50,000.00
	19 Actual revenue 2020 see explanation at page 7 of report.	\$50,998.33	\$41,426.65	\$38,702.46
	20 Annual cost	\$40,528.85	\$73,807.05	\$52,944.87
	21 Surcharge (\$/decatherm)	\$0.01393	\$0.01393	\$0.01393
	22 Annual cost of surcharge for average residential customer who uses 900 therms (90 decatherms) of gas per year. Surcharge effective 1/17/2020.	\$1.25	\$1.25	\$1.32
	23 Tracker balance as of year-end.	\$27,373.75	(\$5,006.65)	(\$19,249.06)
<b>4</b>	<b>Participation</b>			
	24 % of LIHEAP customers that participated in GAP	18%	19%	19%
	25 Number of participants enrolled as of year-end	170	250	189
	26 Number of participants enrolled and receiving benefits at some time during the year	238	322	224
	27 Whether a waiting list occurred at any time during the year	No	No	No
	28 If so, the number of customers on the waiting list and for how long	N/A	N/A	N/A

GREAT PLAINS NATURAL GAS CO.  
GAS AFFORDABILITY REPORTING 2020

Information as required and approved in September 28, 2018 Order-Docket No. G-004/M-16-495

Section	Lines	2018	2019	2020	
5	<b>Impact on disconnect rates</b>				
	<b>Disconnection rates - non GAP LIHEAP baseline</b>				
	29 GAP participants	4%	2%	0%	
	30 Non-GAP LIHEAP customers	14%	14%	0%	
	31 Non-LIHEAP residential customers	4%	3%	0%	
	<b>Disconnection rates - pre-program baseline</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	
	32 GAP participant cohort	4%	2%	0%	
	33 GAP participants cohort before they were enrolled in GAP	1%	2%	1%	
	6	<b>Impact on payment frequency</b>			
		<b>Dollars paid ÷ by dollars requested</b>			
<b>Non-GAP LIHEAP Baseline</b>					
34 GAP participants		56%	64%	59%	
35 Non-GAP LIHEAP customers		30%	26%	21%	
36 Non-LIHEAP residential customers		94%	100%	79%	
<b>Pre-Program Baseline</b>		<b>2018</b>	<b>2019</b>	<b>2020</b>	
37 GAP participants cohort		56%	64%	59%	
38 GAP participant cohort before they were enrolled in GAP		40%	32%	42%	
7		<b>Number of payment made ÷ number of payments requested</b>			
	<b>Non-GAP LIHEAP baseline</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	
	39 GAP participants	52%	56%	54%	
	40 Non-GAP LIHEAP customers	43%	33%	38%	
	41 Non-LIHEAP residential customers	86%	79%	82%	
	<b>Pre-Program Baseline</b>				
	42 GAP participants cohort	52%	56%	54%	
	43 GAP participant cohort before they were enrolled in GAP	41%	42%	43%	
	8	<b>Impact on arrears</b>			
		<b>% Customers in arrears</b>			
<b>Non-GAP baseline</b>		<b>2018</b>	<b>2019</b>	<b>2020</b>	
44 GAP participants		20%	17%	13%	
45 Non-GAP LIHEAP customers		23%	23%	24%	
46 Non-LIHEAP residential customers		15%	11%	10%	
<b>Pre-Program baseline</b>		<b>2018</b>	<b>2019</b>	<b>2020</b>	
47 GAP participant cohort		20%	17%	13%	
48 GAP participant cohort before they were enrolled in GAP	48%	58%	37%		

GREAT PLAINS NATURAL GAS CO.  
GAS AFFORDABILITY REPORTING 2020

Information as required and approved in September 28, 2018 Order-Docket No. G-004/M-16-495

Section	Lines	2018	2019	2020
9	Dollar amount of arrears			
	%Change in dollar amount of arrears (non-GAP LIHEAP baseline)	2018	2019	2020
	49 GAP participants	35%	6%	-66%
	50 Non-GAP LIHEAP customers	155%	-50%	0%
	51 Non-LIHEAP residential customers	34%	28%	36%
10	Dollar amount of arrears (pre-program baseline)	2018	2019	2020
	52 GAP participants cohort	\$138.37	\$177.76	\$59.86
	53 GAP participant cohort before they were enrolled in GAP	\$212.77	\$258.70	\$116.24
11	Complaints	2018	2019	2020
	54 Number of complaints	0	1	0
	55 Nature of complaints	N/A	Monthly Payments	N/A
12	Retention	2018	2019	2020
	56 GAP participant retention rate	71%	78%	84%
13	Impact on collection activity	2018	2019	2020
	57 Brief description of effect of GAP on collection activity	Reduced collections by increasing pymts	Reduced collections by increasing pymts	Reduced collections by increasing pymts
13	Coordination with other programs	2018	2019	2020
	58 Page(s) of report where coordination efforts described	Report filed on March 29, 2019, Attachment A, page 11.	Report filed on March 31, 2020, Page 11.	Report filed on March 31, 2021, Page 11.