



*A Division of Montana-Dakota Utilities Co.*

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June 5, 2025

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-25-37  
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 Reply Comments to the Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) filed on May 22, 2025.

In comments regarding the 2024 GAP Annual Report submitted by Great Plains on March 31, 2025 in the above referenced docket, the Department outlined the following recommendations to the Commission:

- C.1.3. – Acceptance of Great Plains' 2024 annual GAP report.
- C.2.1 – Require all utilities to annually publish definitions and explanations of methodology for tracker items, all items in the outcome spreadsheet and all other attachments. The definitions and methodological explanations should be in a separate attachment and the methodological explanations should be sufficient for the Department to recreate all statistics in all attachments. Sufficient explanations may include any necessary equations.
- D.2 – Great Plains must develop a proposal for an auto-enrollment program in its next annual GAP report. Great Plains should include in its proposal:
  - Monthly tracker that lists expected funds, costs and balances for the first five-years of auto-enrollment;
  - Expected monthly spending, number of GAP participants, and percent of participants who leave or are removed from the program each month;
  - Explanation of the assumptions made in calculating these estimates.

- Great Plains be given the opportunity to comment on this proposal after the filing of CenterPoint's annual report and more information is available on LIHEAP funding at the federal level.

Great Plains appreciates the Department's review and agrees with the recommendation that the Commission accept the Company's 2024 annual GAP report and is amenable to including an attachment starting with next year's annual GAP report providing definitions and explanations regarding tracker items as requested by the Department in C.2.1.

Great Plains has previously expressed concerns with implementing automatic enrollment of customers in GAP<sup>1</sup> citing concerns surrounding technical feasibility, ability to administer such an expanded program, cost increases and impact to customers. Today, the Company's internal administration of GAP is largely a manual process performed by a Consumer Specialist. Implementation of an automatic enrollment program would therefore be a significant undertaking requiring information technology, accounting and credit-related resources in order to effectively implement automatic enrollment in GAP following approval of a proposed plan. The Company appreciates the Department's recommendation to provide additional comments regarding auto-enrollment of customers in its GAP following the Company's review of CenterPoint's annual GAP report.

If you have any questions regarding this filing, please contact me at (701) 222-7855 or Kristin Stastny at (612) 977-8656.

Sincerely,

**/s/ Travis R. Jacobson**

Travis R. Jacobson  
Vice President of Regulatory Affairs

cc: Kristin Stastny

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<sup>1</sup> Docket No. G0004/M-22-255 - Great Plains' Gas Affordability Program Evaluation Report for 2019 – 2021 Utility Response for Comments to Minnesota Public Utilities Commission's August 15, 2022 Notice of Comment Period November 17, 2022 filing pages 7 through 9.