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May 1, 2020

**VIA ELECTRONIC FILING**

Mr. Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, Minnesota 55101-2147

Re: Petition for Approval of 2019 Conservation Improvement Program Tracker Account  
and Conservation Cost Recovery Adjustment Factor  
Docket No. G022/M-20-\_\_\_\_\_

Dear Mr. Seuffert:

Attached hereto, please find Greater Minnesota Gas, Inc.'s Gas Petition for Approval of 2019 Conservation Improvement Program Tracker Account and Conservation Cost Recovery Adjustment Factor for filing in a new docket. A Summary of Filing is also filed herewith.

All individuals identified on the attached service list have been electronically served with the same.

Thank you for your assistance. Please do not hesitate to contact me should you have any questions or concerns or if you require additional information. My direct dial number is (507) 209-2110 and my email address is kanderson@greatermngas.com.

Sincerely,

GREATER MINNESOTA GAS, INC.

/s/  
Kristine A. Anderson  
Corporate Attorney

Enclosure

cc: Service List

# CERTIFICATE OF SERVICE

I, Kristine Anderson, hereby certify that I have this day served a true and correct copy of the following document to all persons at the addresses indicated on the attached list by electronic filing, electronic mail, or by depositing the same enveloped with postage paid in the United States Mail at Faribault, Minnesota:

**Petition for Approval of 2019 Conservation Improvement Program Tracker Account and  
Conservation Cost Recovery Adjustment Factor  
Docket No. G022/M-20-\_\_\_\_\_**

filed this 1<sup>st</sup> day of May, 2020.

/s/ Kristine A. Anderson  
Kristine A. Anderson, Esq.  
Corporate Attorney  
Greater Minnesota Gas, Inc.

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2020
Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2020
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2020
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2020
Brian	Gardow	bgardow@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2020
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2020
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2020
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2020
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2020

**STATE OF MINNESOTA  
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

Katie Sieben  
Valerie Means  
Matt Schuenger  
Joseph Sullivan  
John Tuma

Chair  
Commissioner  
Commissioner  
Commissioner  
Commissioner

Docket No. G022/M-20-\_\_\_\_\_

In the Matter of Greater Minnesota  
Gas, Inc.'s Petition for Approval of  
2019 Conservation Improvement Program  
Tracker Account and Conservation Cost  
Recovery Adjustment

**SUMMARY OF FILING**

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Please take notice that on May 1, 2020, Greater Minnesota Gas, Inc. (GMG) filed a Petition for Approval of 2019 Conservation Improvement Program Tracker Account and Conservation Cost Recovery Adjustment Factor with the Minnesota Public Utilities Commission pursuant to Commission Rules. The Petition seeks to leave GMG's Conservation Cost Recovery Adjustment at \$0.00 per Dth.

Dated: May 1, 2020

Respectfully submitted,

/s/ Kristine A. Anderson  
Kristine A. Anderson  
Corporate Attorney  
Greater Minnesota Gas, Inc.  
1900 Cardinal Lane  
P.O. Box 798  
Faribault, MN 55021  
Phone: 888-931-3411

**STATE OF MINNESOTA  
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

Katie Sieben  
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Docket No. G022/M-20-\_\_\_\_\_

In the Matter of Greater Minnesota  
Gas, Inc.'s Petition for Approval of  
2019 Conservation Improvement Program  
Tracker Account and Conservation Cost  
Recovery Adjustment

**PETITION FOR APPROVAL OF  
2019 CIP TRACKER AND CCRA**

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Greater Minnesota Gas, Inc. (GMG), hereby submits its 2019 Conservation Improvement Program Tracker Account information; and, it proposes to leave its Conservation Cost Recovery Adjustment (CCRA) set at \$0.00 per Dth.

**SUMMARY OF FILING**

Pursuant to Minnesota Rule Part 7829.1300, Subpart 1, a one-paragraph summary of this filing, sufficient to apprise potentially interested parties of its nature and general content, accompanies this Petition.

**SERVICE ON REQUIRED AND INTERESTED PARTIES**

Pursuant to Minnesota Rule Part 7829.1300, Subpart 2, GMG served a copy of this Report on the Residential Utilities Division of the Office of the Attorney General. Pursuant to Minnesota Rule Part 7825.2840, GMG served the Summary of Filing and Notice of Availability of Report on all parties reflected on the accompanying Certificate of Service and Service List.

**GENERAL FILING INFORMATION**

Pursuant to Minnesota Rule Part 7829.1300, Subpart 3, the following specific content is provided:

**A. Name, Address and Telephone Number of the Utility**

Greater Minnesota Gas, Inc.  
1900 Cardinal Lane  
P.O. Box 798  
Faribault, MN 55021  
Telephone: (888) 931-3411

**B. Name, Address and Telephone Number of the Attorney for Utility**

Kristine A. Anderson  
Corporate Attorney  
Greater Minnesota Gas, Inc.  
1900 Cardinal Lane  
P.O. Box 798  
Faribault, MN 55021  
Telephone: (888) 931-3411

**C. Date of Filing and Proposed Effective Date of Rate Change**

Date Filed: May 1, 2020  
Proposed Effective Date: No change is requested

**D. Statute Controlling Time Frame for Processing Filing**

Minn. Stat. § 216B.16, subd. 1, permits a utility to place a rate change into effect subsequent to 60 days' notice to the Commission, unless the rate change is suspended under Minn. Stat. 216B.16, subd. 2. Further, Minn. Stat. § 216B.16, subd. 6b and subd. 6c allow public utilities to file rate schedules providing for annual recovery of actual conservation costs and approved incentives. Under Minn. R. 7829.0100, subp. 11, this Petition constitutes a miscellaneous filing because no determination of the Company's general revenue requirements is necessary. Minn. R. 7829.1400, subp. 1, permits initial comments on miscellaneous filings to be made within 30 days of filing and reply comments 10 days thereafter.

**E. Utility Employee Responsible for this Filing (and Signature):**

/s/ Kristine A. Anderson  
Kristine A. Anderson, Esq.  
Corporate Attorney

**DISCUSSION**

GMG received guidance from the Commission regarding its CCRA in Docket No. G022/M-19-633 wherein the Commission ordered that GMG's CCRA be set at \$0.00 effective January 1, 2020 as a result of GMG's over-recovery of CIP expenses. At that time, the Commission considered GMG's 2019 tracker information that included its projected year-end tracker balance.

GMG's CIP tracker activity and actual balance as of December 31, 2019 is reflected in Attachment A. Since the tracker reflects an over-recovery at year end, GMG does not propose any change to its CCRA and recommends leaving it set at \$0.00 per Dth.

**REQUEST FOR COMMISSION ACTION**

GMG respectfully requests that the Commission approve its 2019 Conservation Improvement Program Tracker Account and its proposal to leave its Conservation Cost Recovery Adjustment (CCRA) set at \$0.00 per Dth.

Dated: May 1, 2020

Respectfully submitted,

/s/ Kristine A. Anderson  
Kristine A. Anderson  
Corporate Attorney  
Greater Minnesota Gas, Inc.  
1900 Cardinal Lane  
P.O. Box 798  
Faribault, MN 55021  
Phone: 888-931-3411

# ATTACHMENT A

Greater Minnesota Gas  
CIP Tracker and Balance  
2019

	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Annual
<u>Expenses</u>	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Summary
1 Beginning Balance- Under/(Over) Recovered	(89,196)	(79,414)	(127,725)	(163,405)	(178,764)	(182,586)	(174,223)	(177,777)	(177,325)	(157,737)	(167,612)	(212,650)	(89,196)
2 CIP Expenses	67,972	17,302	16,859	17,365	16,036	19,685	4,457	9,816	31,263	15,751	21,885	22,756	261,147
3 Financial Incentive													
4 Additional Adjustments													
5 <b>Total Balance, Expenses, Adjustments, Incentive (Lines 1+2+3+4)</b>	<b>(21,224)</b>	<b>(62,112)</b>	<b>(110,866)</b>	<b>(146,040)</b>	<b>(162,728)</b>	<b>(162,901)</b>	<b>(169,766)</b>	<b>(167,961)</b>	<b>(146,062)</b>	<b>(141,986)</b>	<b>(145,727)</b>	<b>(189,894)</b>	<b>171,951</b>
<b><u>Recoveries</u></b>													
6 Total Sales (MCF)	275,550	308,021	245,892	152,450	91,923	51,627	36,522	42,700	53,252	120,886	311,737	273,221	1,963,781
7 CIP-Exempt Sales (MCF)	12,605	11,529	8,485	4,577	2,189	464	324	386	495	5,091	9,327	11,897	67,369
8 Total CIP-Applicable Sales (MCF) (Line 6 - Line 7)	262,945	296,492	237,407	147,873	89,734	51,163	36,198	42,314	52,757	115,795	302,410	261,324	1,896,412
9 Base Rate (CCRC) (\$/Dth)	0.0413	0.0413	0.0413	0.0413	0.0413	0.0413	0.0413	0.0413	0.0413	0.0413	0.0413	0.0413	
10 Base Rate (CCRC) Recovery (\$) (Line 8*Line 9)	(10,860)	(12,245)	(9,805)	(6,107)	(3,706)	(2,113)	(1,495)	(1,748)	(2,179)	(4,782)	(12,490)	(10,793)	(78,322)
11 Adjustment Factor (CCRA) (\$/Dth)	0.18	0.18	0.18	0.18	0.18	0.18	0.18	0.18	0.18	0.18	0.18	0.18	
12 Adjustment Factor (CCRA) Recovery (\$) (Line 8 * Line 11)	(47,330)	(53,369)	(42,733)	(26,617)	(16,152)	(9,209)	(6,516)	(7,617)	(9,496)	(20,843)	(54,434)	(47,038)	(341,354)
13 <b>Total Recoveries (\$)</b> (Lines 10 + 12)	<b>(58,190)</b>	<b>(65,614)</b>	<b>(52,538)</b>	<b>(32,724)</b>	<b>(19,858)</b>	<b>(11,322)</b>	<b>(8,011)</b>	<b>(9,364)</b>	<b>(11,675)</b>	<b>(25,625)</b>	<b>(66,923)</b>	<b>(57,831)</b>	<b>(419,676)</b>
<b><u>Carrying Charges</u></b>													
14 <b>Sub-Balance (\$)</b> (Lines 5 + 13)	(79,414)	(127,725)	(163,405)	(178,764)	(182,586)	(174,223)	(177,777)	(177,325)	(157,737)	(167,612)	(212,650)	(247,725)	<b>(247,725)</b>
15 Carrying Charge Rate													
16 Carrying Charges (\$) (Line 14 * Line 15)													
17 <b>Ending Tracker Balance (\$)</b> - Under/(Over) Recovered (Lines 14 + 16)	<b>(79,414)</b>	<b>(127,725)</b>	<b>(163,405)</b>	<b>(178,764)</b>	<b>(182,586)</b>	<b>(174,223)</b>	<b>(177,777)</b>	<b>(177,325)</b>	<b>(157,737)</b>	<b>(167,612)</b>	<b>(212,650)</b>	<b>(247,725)</b>	<b>(247,725)</b>