COMMERCE DEPARTMENT

August 29, 2018 **PUBLIC DOCUMENT**

Mr. Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **PUBLIC Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. PL6580/M-18-465

Dear Mr. Wolf:

Attached are the **PUBLIC** Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

> A Petition by Greater Minnesota Transmission, LLC for Approval by the Minnesota Public Utilities Commission of a Firm Gas Transportation Agreement (Agreement) with Northwest Natural Gas of Cass County, LLC, Inc.

The Petition was submitted on July 5, 2018. The petitioner is:

> Kristine A. Anderson
> Corporate Attorney
> Greater Minnesota Transmission, Inc.
> 202 South Main Street, P.O. Box 68
> Le Sueur, Minnesota 56058

The Department recommends approval of the Agreement, pending resolution of the regulatory status of Northwest Natural Gas of Cass County, LLC, Inc.

The Department is available to answer any questions that the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ JOHN KUNDERT
Financial Analyst
651-539-1740

/s/ ADAM HEINEN
Rates Analyst
651-539-1825

JK/AH/ja
Attachment

COMMERCE DEPARTMENT

Before the Minnesota Public Utilities Commission

Public Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. PL6580/M-18-465

I. BACKGROUND

On July 5, 2018, Greater Minnesota Transmission, LLC (GMT or the Company) filed a *Petition for Approval of Firm Gas Transportation Agreement* (Petition) with the Minnesota Public Utilities Commission (Commission). The *Firm Transportation Agreement Between Greater Minnesota Transmission, L.L.C. and Northwest Natural Gas of Cass County, L.L.C.* (Agreement) sets forth the terms and conditions of service, including rate design and rates, between GMT and Northwest Natural Gas of Cass County, LLC, Inc. (NNGCC) to provide natural gas service to the community of Walker, Minnesota. The planned project governed by the Agreement involves the construction of 15.1 miles of new transmission line from Great Lakes Gas Transmission's (Great Lakes) Cass Lake Town Border Station (TBS) to a NNGCC receipt point near Walker, Minnesota.

Under the terms of the Agreement, NNGCC would purchase its own natural gas and arrange transport to the Cass Lake TBS with Great Lakes and GMT. From the Cass Lake TBS, GMT would accept delivery of NNGCC's natural gas and transport it to the agreed-upon interconnection. The Agreement allows for the transport of up to **[TRADE SECRET DATA HAS BEEN EXCISED]** Dekatherms (Dth) per day at a minimum operating pressure of **[TRADE SECRET DATA HAS BEEN EXCISED]** pounds per square inch (psi) over a **[TRADE SECRET DATA HAS BEEN EXCISED]** term.

The Agreement contains a standard rate structure for an intrastate pipeline. The rate negotiated by GMT and NNGCC involves a monthly demand charge of **[TRADE SECRET DATA HAS BEEN EXCISED]** and a volumetric charge of **[TRADE SECRET DATA HAS BEEN EXCISED]**.

The Minnesota Department of Commerce, Division of Energy Resources (Department) provides its analysis of the Petition below. As is standard in this sort of filing, the Department's financial analysis focuses primarily on the petitioner, GMT.

The Department also provides a discussion of GMT's counter-party under the Agreement, NNGCC. Consistent with past practice, the Department gathered publically available

information regarding NNGCC with an emphasis on that entity's current regulatory status in Minnesota. The Department discusses NNGCC and its regulatory status separately below.

II. ANALYSIS

The Department's analysis includes the following sections: 1) the statutory requirements of an intrastate natural gas pipeline; 2) cost recovery associated with the Agreement, and 3) NNGCC's regulatory status.

A. REQUIREMENTS OF MINNESOTA STATUTES AND RULES

Minn. Stat. § 216B.045, subd. 1 states:

> For the purposes of this section "intrastate pipeline" means a pipeline wholly within the state of Minnesota which transports or delivers natural gas received from another person at a point inside or at the border of the state, which is delivered at a point within the state to another, provided that all the natural gas is consumed within the state. An intrastate pipeline does not include a pipeline owned or operated by a public utility, unless a public utility files a petition requesting that a pipeline or a portion of a pipeline be classified as an intrastate pipeline and the commission approves the petition.

Because the project involves an intrastate pipeline, GMT must comply with the provisions of Minn. Stat. § 216B.045. The Department notes that GMT is not a public utility since it does not furnish retail natural gas service. As such, the Company is not subject to the same Minnesota Rules as regulated distribution companies such as Xcel Energy or CenterPoint Energy. The Commission has not promulgated rules applicable to intrastate pipelines under Minnesota Statute § 216B.045; as such, there appear to be no Minnesota Rules that specifically apply to GMT's provision of intrastate wholesale transportation service.

Minnesota Statute § 216B.045 requires that an owner of an intrastate pipeline provide service under the following three conditions:

- Contract at rates that are just and reasonable and do not unreasonably discriminate among customers receiving like or contemporaneous services (Minnesota Statute § 216B.045, subd. 2);
- Offer services by contract on an open access, nondiscriminatory basis (Minnesota Statute § 216B.045, subd. 3); and
- Obtain Commission approval for each contract to be effective (Minnesota Statute § 216B.045, subd. 4).

The Department separately discusses these statutory requirements below.

1. Contract at Reasonable Rates

The Agreement contains standard language and rate design. As noted in the filing, Minnesota Statute § 216B.03 states:

> Rates shall not be unreasonably preferential, unreasonably prejudicial, or discriminatory, but shall be sufficient, equitable, and consistent in the application to a class of customers.

The Department notes that, under most circumstances, a reasonable rate could be defined as being a rate based on a utility's cost of service. This reasonableness check is generally associated with the review of retail rate regulated utilities. In certain instances, however, a reasonable rate may be a rate that is negotiated as part of an arm's length transaction. GMT incorporated this latter argument in its filing. In simple terms, one could find the rates in this Agreement reasonable because all parties involved have agreed to those rates through the negotiating process. The Department is generally agreeable to the Company's reasoning in this Petition because it is consistent with past practice. Specifically, the proposed cost-recovery mechanism for the pipeline-related costs associated with this project is similar to other intrastate pipeline projects previously proposed by the Company.[1]

Despite the negotiated rate, it is necessary to review the various assumptions made by GMT to determine whether those assumptions are reasonable. Although this project is not fully analogous to a retail utility project, the Department believes it is important that the rates and forecasted revenue generated under the Agreement is reviewed to ensure that it is crafted in a way that provides reasonable benefit to NNGCC while still allowing GMT an opportunity to earn an acceptable return.

2. Obligation to Offer Service

As previously noted, GMT is required to offer services by contract on an open-access, non-discriminatory basis. GMT stated in the Petition that since it would willingly enter into negotiations with other similarly situated private entities to discuss similar cooperative agreements that would serve the public interest in other respective communities, there is no discriminatory element to the Agreement and GMT has complied with its statutory obligation to offer its terms on an open-access basis. In addition, the terms and conditions contained in the Agreement are substantially similar to those approved by the Commission in previous

[1] Docket Nos. PL6580/M-06-1063; PL6580/M-13-91; PL6580/M-13-94; PL6580/M-14-386; G022/M-14-342; PL6580/M-14-1056; PL6580/M-15-967; and PL6580/M-15-968 among others.

similar GMT filings. Consequently, the Department concludes that the Company offers service on an open-access, non-discriminatory basis.

Based on its analysis, the Department concludes that GMT is offering its services by contract on an open-access, non-discriminatory basis which appears unlikely to unreasonably discriminate among customers receiving like services.

3. Approval of the Agreement

NNGCC and GMT signed the Agreement on June 27, 2018. The Company submitted the Agreement to the Commission for approval on July 5, 2018. Subject to regulatory approval,[2] GMT will begin providing service beginning the later of (i) September 1, 2019 or (ii) the date when the Company has completed the construction of all necessary facilities to effectuate the transportation of gas. Since the Agreement is subject to Commission approval, the Department concludes that the proposed effective date is not inconsistent with Minnesota Statutes.

B. FINANCIAL ANALYSIS

The Department's primary criterion for review in a filing of this type is that the project is financially viable from GMT's perspective. Since GMT owns, and operates, several other intrastate pipeline projects, it is necessary to verify whether construction of the project may have a negative impact on the Company's overall financial health and, potentially, the operation of other pipelines.

While the rates NNGCP has agreed to as part of the Agreement are also a concern for the Department, the fact that Minn. Statute § 216B.045, subd. 5 allows for a complaint process before the Commission lessens the Department's rate-related concerns over the long-term.

The Department reviewed the assumptions, and calculations used by the Company in its financial analysis of the project. If the project is constructed and operates in accordance with the assumptions in the model, GMT will earn an average of **[TRADE SECRET DATA HAS BEEN EXCISED]** percent return on equity over the term of the Agreement.

[2] See Section 7.0 of the Agreement.

1. Contingencies Evaluated

The Department's analysis evaluates three scenarios relative to the project's capital costs and volumetric revenues. The threshold for these scenarios is a change in either factor that might result in GMT no longer complying with the interest coverage ratio included in the loan agreement that financed the project. Given the information included in its financial analysis, the Department inferred that GMT's loan agreement requires GMT to maintain a Fixed Charge Coverage Ratio of at least **[TRADE SECRET DATA HAS BEEN EXCISED]** for the project.[3] By extension, the Department's analysis also assumed that the Company would be able to amend or renegotiate that loan agreement if one of those contingencies identified in the scenarios actually occurred.

The Department also included an additional descriptor in its contingency analysis in this docket -- annual load utilization factor. Annual load utilization factor is a useful metric for this type of analysis in that it allows the Commission to identify the impact of the different scenarios at an operational level.

Scenario 1 attempted to quantify the risk GMT assumed under the Agreement related to changes in throughput. It quantified the maximum amount of decrease in the forecasted volumetric revenue that GMT could experience and remain in compliance with the Fixed Charge Coverage Ratio requirement.

GMT's Base Case assumes **[TRADE SECRET DATA HAS BEEN EXCISED]** in annual volumetric revenue which results in a **[TRADE SECRET DATA HAS BEEN EXCISED]** annual load utilization factor in the first year of operation. GMT's Base Case also assumes an average annual increase in commodity revenue of **[TRADE SECRET DATA HAS BEEN EXCISED]** during the first **[TRADE SECRET DATA HAS BEEN EXCISED]** years of the Agreement. The Department used Excel's Goal Seek function to determine the annual volumetric revenue GMT would need to recover in order to remain in compliance with the minimum required Fixed Charge Coverage Ratio.[4] The Department's analysis identified **[TRADE SECRET DATA HAS BEEN EXCISED]** as the minimum amount of annual volumetric revenue GMT would need to recover in order to remain in compliance with its loan covenant in the first year of the Agreement. **TRADE SECRET** Table 1 summarizes this information.

3 The Fixed Charge Coverage Ratio is defined in GMT's financial model as the annual Earnings before Interest, Taxes, Depreciation and Amortization (EBITDA) divided by the annual loan payment. In GMT's case, the fixed Charge Coverage Ratio can be affected by a variance from forecasted revenues and/or operating expenses or both.
4 This Fixed Charge Coverage Ratio has been consistent in GMT's financial models included in Docket Nos. PL6580/M-14-1056; PL6580/M-15-967; and PL6580/M-15-968.

TRADE SECRET Table 1 – Comparison of Forecasted Annual Volumetric Revenue Estimated in the Base Case and Scenario 1, the Fixed Charge Ratio and the Annual Load Utilization Factor

Description	Base Case w/o Contingency	Scenario 1	Variance	Percentage Change
Volumetric revenue ($/yr)	**[TRADE SECRET DATA HAS BEEN EXCISED]**			
Fixed Charge Coverage Ratio				
Annual Load Utilization Factor				

The information contained in Table 1 suggests that GMT could withstand a significant decrease in throughput-related revenue and remain in compliance with its loan agreement, *ceteris paribus*. As to the minimum percentage rate of increase GMT could withstand under the Agreement under the first, **[TRADE SECRET DATA HAS BEEN EXCISED]** years of the Agreement, the Department's average annual percentage increase was **[TRADE SECRET DATA HAS BEEN EXCISED].**

Scenario 2 relates to the risk associated with GMT's ability to forecast its capital costs correctly while remaining in compliance with the Fixed Charge Coverage Ratio requirement. GMT's Base Case assumes **[TRADE SECRET DATA HAS BEEN EXCISED]** in capital costs and a contingency of **[TRADE SECRET DATA HAS BEEN EXCISED]** for a total investment plus contingency of **[TRADE SECRET DATA HAS BEEN EXCISED]**. It also assumes a **[TRADE SECRET DATA HAS BEEN EXCISED]** debt equity ratio that results in **[TRADE SECRET DATA HAS BEEN EXCISED]** of equity and **[TRADE SECRET DATA HAS BEEN EXCISED]** in debt. The Department estimates that GMT's current capital cost estimate (excluding the **[TRADE SECRET DATA HAS BEEN EXCISED]** contingency) could increase by **[TRADE SECRET DATA HAS BEEN EXCISED]** and the Company would remain in compliance with its loan covenant. This information is summarized in **TRADE SECRET** Table 2.

TRADE SECRET Table 2 – Comparison of Forecasted Capital Costs in the Base Case and Scenario 2, the Fixed Charge Ratio and the Annual Load Utilization Factor

Description	Base Case w/o Contingency	Scenario 2	Variance	Percentage Change
Capital Costs with Current Contingency	**[TRADE SECRET DATA HAS BEEN EXCISED]**			
Fixed Charge Coverage Ratio				
Annual Load Utilization Factor				

A **[TRADE SECRET DATA HAS BEEN EXCISED]** increase in the project's capital costs would represent a significant increase in capital costs for a project of this type. The analysis in Table 2 assumes that GMT's annual loan payment would not increase (*i.e.,* GMT would fund the cost over-run in excess of the current **[TRADE SECRET DATA HAS BEEN EXCISED]** contingency with equity). Therefore, it appears that GMT has a reasonable buffer in terms of potential increases in capital costs before it would be in violation of the loan agreement.

Scenario 3 attempted to identify the combined effects of higher-than-forecasted capital costs and lower-than-forecasted volumetric revenues. The Department iterated around a **[TRADE SECRET DATA HAS BEEN EXCISED]** benchmark (capital cost increase or volumetric revenue decrease) for this scenario. The result was an increase of **[TRADE SECRET DATA HAS BEEN EXCISED]** in capital costs and a **[TRADE SECRET DATA HAS BEEN EXCISED]** decrease in volumetric costs in the first year of the project. The latter change also lowered the annual load utilization factor from **[TRADE SECRET DATA HAS BEEN EXCISED]** to **[TRADE SECRET DATA HAS BEEN EXCISED]**. **TRADE SECRET** Table 3 summarizes this information.

TRADE SECRET Table 3 – Comparison of Changes in Capital Costs and Volumetric Revenue in the Base Case and Scenario 3, the Fixed Charge Ratio and the Annual Load Utilization Factor

Description	Base Case w/o Contingency	Scenario 3	Variance	Percentage Change
Capital Costs ($)	**[TRADE SECRET DATA HAS BEEN EXCISED]**			
Volumetric Revenue ($/yr)				
Fixed Charge Coverage Ratio				
Annual Load Utilization Factor				

The project can withstand a combination of an increase of **[TRADE SECRET DATA HAS BEEN EXCISED]** in its capital costs and a decrease of **[TRADE SECRET DATA HAS BEEN EXCISED]** in its initial annual volumetric revenue before violating its loan agreement, all other things being equal.

TRADE SECRET Table 4 is intended to provide a context for the annual load utilization factor estimates included in Tables 1 through 3. **TRADE SECRET** Table 4 shows the projected and actual 2017 annual load utilization factors for four earlier GMT pipeline-related dockets (14-1056, 15-967, 15-968 and 15-1041).[5]

TRADE SECRET Table 4 – Comparison of Forecasted and 2017 Actual Annual Load Utilization Factors in Selected GMT Dockets

Docket No.	Forecasted Annual Load Utilization Factor	Actual 2016 Annual Load Utilization Factor
14-1056	**[TRADE SECRET DATA HAS BEEN EXCISED]**	
15-967		
15-968		
15-1041		

[5] The Commission required GMT "to file an annual letter stating the Co-op's annual load utilization factor separately for each pipeline" in its Order dated May 26, 2015 in Docket No. PL6580/M-14-1056. GMT filed that information for calendar year 2017 on January 12, 2018.

The forecasted annual load utilization factor included in the instant docket (18-465) is lower than the forecasted annual load factors for the four dockets listed. The Company's forecasted annual load utilization factor does not appear to be unreasonable given this comparison. As to the actual load factors in 2017 for these four intrastate pipelines, GMT's forecasted annual load factor in this proceeding **[TRADE SECRET DATA HAS BEEN EXCISED]** is significantly lower than 1 of the 4 actual annual load factors listed in Table 4 and close to two of the remaining annual load factors.

As a result, the Department concludes that if the project is developed as planned, GMT's ability to serve other customers and projects is unlikely to be negatively impacted. Thus, the Department's financial analysis of the Agreement finds that it is appropriate.

In most instances, the Department's financial review would form an adequate basis for recommending approval of the filing. In this instance, clarity as to NNGCC's regulatory status should be resolved prior to Commission approval of an Agreement that would enable NNGCC to increase the number of customers it serves.

III. NORTHWEST NATURAL GAS OF CASS COUNTY - REGULATORY ANALYSIS

As noted above, GMT proposes to construct a transmission pipeline to Walker, Minnesota where NNGCC would then provide retail natural gas service. Given this information, the Department conducted an additional analysis regarding NNGCC and its current regulatory position.

To the Department's knowledge, NNGCC has not received an exemption from state regulation to provide natural gas service to retail customers in Cass County as a local distribution company. This is somewhat troubling in that, based on information filed in Docket No. E,G999/PR-17-19, NNGCC[6] reported 1,478 total customers for 2016 in the annual reports submitted pursuant to Minnesota Statutes, section 216C.17, subd. 1 and Minnesota Rules Chapter 7610.[7]

Minnesota Statutes Chapter 216B, which includes provisions addressing the ability of a small gas utility to seek and obtain exemption from state regulation, includes two references to gas utility size. Minnesota Statutes § 216B.02, subd. 4 defines public utility for regulatory purposes including a provision exempting entities that serve less than 650 customers within a city

[6] The utility name listed on the REIS report was "Gorham's Inc dba Northwest Gas of Cass County." The Department notes that the utility name listed in eDockets is Northwest Gas Cass Lake.
[7] Docket No. E,G999/PR-17-19
.

pursuant to a franchise agreement. Minnesota Statute § 216B.12, subd. 12 provides additional requirements regarding small gas utility exemptions and states the following in relevant part:

> (a) A municipality may file with the commission a resolution of its governing body requesting exemption from the provisions of this section for a public utility that is under a franchise with the municipality to supply natural, manufactured, or mixed gas and that serves 650 or fewer customers in the municipality as long as the public utility serves no more than a total of 5,000 customers.
> (b) The commission shall grant an exemption from this section for that portion of a public utility's business that is requested by each municipality it serves. Furthermore, the commission shall also grant the public utility an exemption from this section for any service provided outside of a municipality's border that is considered by the commission to be incidental. The public utility shall file with the commission and the department all initial and subsequent changes in rates, tariffs, and contracts for service outside the municipality at least 30 days in advance of implementation.
> (c) However, the commission shall require the utility to adopt the commission's policies and procedures governing disconnection during cold weather. The utility shall annually submit a copy of its municipally approved rates to the commission.

Given NNGCC's customer count, and the wording of Minnesota Statutes, it appears that NNGCC may meet the requirements of a small gas utility exemption. However, the Department notes the following:

- NNGCC has not requested a small gas utility exemption.
- No municipality has filed a resolution requesting exemption for NNGCC; and
- The Department cannot confirm NNGCC's compliance with the Cold Weather Rule (CWR) provisions because the Department was unable to locate any CWR reports submitted by NNGCC.

Without this information, the Department cannot determine whether NNGCC is operating appropriately within the requirements of Minnesota Statutes Chapter 216B.

Beyond the question of whether NNGCC might qualify for exemption from state regulation if it were to request such an exemption, the Department's research identified some additional issues regarding NNGCC's operations relative to two other Northwest Natural Gas companies, Northwest Natural Gas LLC (NWGLLC) and Northwest Natural Gas of Murray County, LLC (NWGMC).

While NGWLLC, NWGMC, and NNGCC are apparently different legal entities, the Department's research suggests that they may be considered to function as one utility from an operational perspective. Beyond sharing similar names, the Department observed that these three entities;

- share the same logo (Department Attachment 1);
- reference the same service territory (Department Attachment 2);
- may have related ownership (as referenced in an interview with NNGCC's confirmed owner) (Department Attachment 3), and;
- likely have a unified billing system (Department Attachment 4).[8]

Further, the Department observed that customers for NWGLLC and NWGMC can pay their natural gas bills directly at NNGCC's offices in Grand Rapids (Department Attachment 5).

Given that the three Northwest Natural Gas companies may be one utility from certain operational perspectives, it may be reasonable to question whether a combined entity (NWGLLC, NNGCC and NWGMC) would have a sufficient number of customers to broach the 5,000 customer limit for exemption identified in Minnesota Statute § 216B.12, subd. 2(a).

Table 5 below provides the most recently reported customer counts for each of the Northwest Natural Gas utilities. The combined customer count exceeds 5,000 customers.

Table 5: Total Estimated Combined Customer Count

Affiliate Utility	Customer Count
Northwest Natural Gas, Cass County*	1,478
Northwest Natural Gas, LLC	2,046
Northwest Natural Gas, Murray County	1,483
Total Customer Count	5,007

* At the time of this filing, NNGCC has not filed its 2017 Minnesota Rules Chapter 7610 data in Docket No. E,G999/PR-18-19. 2016 customer data is provided. Department Attachment 6.

If the Northwest Natural Gas utilities were considered a single utility, that utility would not be eligible for an exemption and would be subject to full rate regulation by the Commission.

Commission approval of the Agreement would likely result in an increase in NNGCC's customer count. It is not known how many customers NNGCC expects to serve within Walker, or how many the utility already serves in other municipalities. Therefore, approval of the Agreement should not be granted until NNGCC's regulatory status is resolved to the Commission's satisfaction.

[8] In terms of the billing system, the Department notes that the online billpay options for NNGCC, NWGLLC, and NWGMC all go to the same web address and have the same phone and email contact information.

IV. RECOMMENDATIONS

The Department recommends approval of the Agreement, pending resolution of NNGCC's regulatory status to the Commission's satisfaction.

/ja

218.326.3495

Northwest Gas Company

About Us

The company which now operates as Northwest Gas in northern Minnesota had its origin in the operations of Kanabec Hardware, located in Mora, MN. Kanabec Hardware was established following WW I by Frank Gorham and Kleo McIlhargey and one of their lines was the sale of propane-fired home space heaters and the delivery of propane cylinders to fuel them. These cylinders were filled at a facility in Little Falls cooperatively owned by a group of Our Own Hardware store owners. Following WW II Bob and Jack Gorham (sons of Frank) returned from the armed services and pursued the continued growth of the propane operation, which now became known as Gorhams' Gas ("the Company"). Gorhams', Inc., a Minnesota corporation, was formed to hold the gas operations. Gorhams', Inc. built its first propane bulk plant in Mora in 1952 and commenced installing propane tanks and making bulk propane deliveries to customers.

While continuing to grow organically, the propane operation also was expanded by the acquisition of neighboring propane delivery operations. Following the purchase of Northwest Natural Gas in Milaca, MN (despite the name, a propane delivery operation) the entire company was re-branded as Northwest LP Gas. During the early 1960s natural gas came to East Central Minnesota, causing the loss of propane customers to natural gas in the towns newly served by natural gas utilities. Company management successfully pursued a franchise and built their first pipeline distribution system in Ogilvie, MN. Unfortunately, the town's largest gas consumer, a creamery, ceased operations just as the gas distribution system was being built. The loss of this customer resulted in project economics which did not allow the serving natural gas transmission company, Northern Natural Gas, to extend its transmission line to Ogilvie. Company management then built a new propane bulk plant to serve the Ogilvie town system with propane gas. This operation was branded Northwest Natural Gas.

Over the next decade the Company built two more town propane distribution pipelines, added numerous resort or development propane distribution pipelines and continued to add customers to its trucked propane delivery operations both by organic growth and by acquisition. Mike Gorham joined the Company in 1981 and continued both the acquisition of trucked propane operations (Grand Rapids in 1985) and pipeline propane distribution systems.

Beginning in 1990, Company management involved in strategic planning began to explore the practicability of installing natural gas pipeline distribution systems in towns not yet served with natural gas. Following the determination that the economics were favorable for natural gas pipeline distribution systems serving some of these towns the Company, through an affiliate, decided to initiate natural gas service in Ogilvie, where the Company already owned and operated a propane pipeline gas distribution system. New natural gas systems were built (also by affiliated companies) in Henderson in 1992 and in Mapleton, Minnesota Lake, Vernon Center and Good Thunder in 1993. In 1994 a natural gas distribution system was built to serve Slayton, Fulda, Dovray, Avoca and Currie.

Also during the early 1990s, the Company sold two of its propane pipeline town systems and one of its large development systems to Minnegasco (now Centerpoint Energy). These sales were necessitated by Minnegasco's expansion plans enveloping formerly propane territories.

In 1997, most of Gorhams', Inc.'s owners elected to sell their interest in that company. Mike Gorham decided to maintain his ownership, so a sale of the southern Gorhams', Inc. assets (all of the propane assets except for Grand Rapids) was made to an outside buyer, the departing owners were cashed out and Mike Gorham became the sole owner of Gorhams', Inc.

During the summer of 1998 Gorhams', Inc. built a natural gas distribution system in Cass Lake which it has owned and operated since. In 2012 Gorhams', Inc. commenced build-out of a natural gas distribution system serving the extreme southwest portion of the City of Grand Rapids and the extreme northwest portion of Harris Township. In addition Gorhams', Inc. operates and maintains five northern Minnesota natural gas or propane pipeline systems for other owners.

Currently Gorhams', Inc. doing business as Northwest Gas owns a trucked propane delivery operation based in Grand Rapids, the natural gas pipeline distribution systems in Cass Lake and southwest Grand Rapids and several propane pipeline distribution systems at Grand Rapids area resorts and developments and serving the southeast extremes of Bigfork. Northwest Gas operates and maintains natural gas distribution systems owned by the cities of Clarissa, Eagle Bend and Cohasset, the State of Minnesota-owned gas systems serving Fort Ripley (natural gas with a propane backup) and Thistledew Camp (a propane system) and provides limited support services to the City of Randall for their natural gas distribution system. Northwest Gas also operates and maintains a direct-connect natural gas pipeline for Minnesota Power at its Boswell generation facility in Cohasset.

 1608 NW 4th Street Grand Rapids, MN 55744
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Navigation

NORTHWEST GAS

Making Natural Gas Available to Rural Communities of Minnesota

Welcome!

In existence since 1991, Northwest Natural Gas began in the town of Ogilvie, MN with members of the Gorham family; Mike, Pat, Jon, Julie Gorham Freeman and Laurie Gorham Ardner. In 2015 & 2016, several members of the next generation have started to become involved. Additional members now include Rachel Gorham Sorrentino, Neil Gorham, Angela Gorham, Lisa Freeman and Bruce Freeman.

In 1992, service was expanded to the Henderson area and in 1993 to the Maple River area. Northwest Natural Gas' headquarters was built in Mapleton in 1993. During the summer of 1993 pipeline was installed to feed the towns of Vernon Center, Good Thunder, Mapleton and Minnesota Lake. In 1994, the towns of Avoca, Currie, Dovray, Fulda and Slayton of Murray County were added. The town of Cass Lake was added in 1999, and in 2008, the City of Bingham Lake in Cottonwood County. 2012 brought the start of several expansions in the Harris & Blackberry Townships in the Grand Rapids Area, with more expansion planned in the near future.

Northwest Natural Gas now employs six full-time and three part-time employees. As a family-owned entity, Northwest Natural Gas continues to serve its residential and commercial customers with the best of service.

Meet Our Staff

See The Communities We Serve

About Us

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In 1997, most of Gorhams', Inc.'s owners elected to sell their interest in that company. Mike Gorham decided to maintain his ownership, so a sale of the southern Gorhams', Inc. assets (all of the propane assets except for Grand Rapids) was made to an outside buyer, the departing owners were cashed out and Mike Gorham became the sole owner of Gorhams', Inc.

During the summer of 1998 Gorhams', Inc. built a natural gas distribution system in Cass Lake which it has owned and operated since. In 2012 Gorhams', Inc. commenced build-out of a natural gas distribution system serving the extreme southwest portion of the City of Grand Rapids and the extreme northwest portion of Harris Township. In addition Gorhams', Inc. operates and maintains five northern Minnesota natural gas or propane pipeline systems for other owners.

Currently Gorhams', Inc. doing business as Northwest Gas owns a trucked propane delivery operation based in Grand Rapids, the natural gas pipeline distribution systems in Cass Lake and southwest Grand Rapids and several propane pipeline distribution systems at Grand Rapids area resorts and developments and serving the southeast extremes of Bigfork. Northwest Gas operates and maintains natural gas distribution systems owned by the cities of Clarissa, Eagle Bend and Cohasset, the State of Minnesota-owned gas systems serving Fort Ripley (natural gas with a propane backup) and Thistledew Camp (a propane system) and provides limited support services to the City of Randall for their natural gas distribution system. Northwest Gas also operates and maintains a direct-connect natural gas pipeline for Minnesota Power at its Boswell generation facility in Cohasset.

 1608 NW 4th Street Grand Rapids, MN 55744
• Phone(218) 326-3495 • Fax(218) 999-5495

Navigation

NORTHWEST GAS

Making Natural Gas Available to Rural Communities of Minnesota

Communities Served

Avoca
Bingham Lake
Cass Lake
Currie
Dovray
Fulda
Good Thunder
Grand Rapids
Henderson
Mapleton
Minnesota Lake
Ogilvie
Slayton
Vernon Center

RED indicates locations with our Convenient Payment Boxes

Navigation

NORTHWEST GAS

Making Natural Gas Available to Rural Communities of Minnesota

Welcome!

In existence since 1991, Northwest Natural Gas began in the town of Ogilvie, MN with members of the Gorham family; Mike, Pat, Jon, Julie Gorham Freeman and Laurie Gorham Ardner. In 2015 & 2016, several members of the next generation have started to become involved. Additional members now include Rachel Gorham Sorrentino, Neil Gorham, Angela Gorham, Lisa Freeman and Bruce Freeman.

In 1992, service was expanded to the Henderson area and in 1993 to the Maple River area. Northwest Natural Gas' headquarters was built in Mapleton in 1993. During the summer of 1993 pipeline was installed to feed the towns of Vernon Center, Good Thunder, Mapleton and Minnesota Lake. In 1994, the towns of Avoca, Currie, Dovray, Fulda and Slayton of Murray County were added. The town of Cass Lake was added in 1999, and in 2008, the City of Bingham Lake in Cottonwood County. 2012 brought the start of several expansions in the Harris & Blackberry Townships in the Grand Rapids Area, with more expansion planned in the near future.

Northwest Natural Gas now employs six full-time and three part-time employees. As a family-owned entity, Northwest Natural Gas continues to serve its residential and commercial customers with the best of service.

Meet Our Staff

See The Communities We Serve

Piping with natural gas increases revenue for propane marketers

September 9, 2016 By James Guyette

It's not necessarily considered going over to the dark side if you also provide natural gas service to your customers. Several operations commonly associated with the propane industry have successfully ventured into the natural gas business.

"We're a very small company, but it works for us. And if we can do it, anybody can," says Mike Sheehan at **Sheehan's LP Gas Co.** in Bird Island, Minn.

"It's absolutely the best thing I ever did," he adds. "We complain a lot about the natural gas companies coming in to steal our customers. Well, we can get into it too: If you can lay pipe, you can do this."

Minnesota propane retailer Northwest Gas also supplies natural gas to 14 small towns. Customer tank-swapping issues motivated the company to diversify.

Sheehan's propane and natural gas accounts are equal at 900 apiece, with one being selected as the customer's energy source of choice. The units of measurement differ – LP gas' gallons versus natural gas' cubic feet, but "they use about the same amount of energy, whether it's natural gas or propane," he says.

An in-house-trained crew of five handles the trenching, piping and connecting tasks, made easier by the use of flexible plastic pipe materials.

"In propane, you have to buy a tank and a truck. With natural gas, you just need the piping and you need to read the meter each month," Sheehan says. "We as propane retailers have an advantage because you can pick up the propane tank and use it somewhere else, so you have an advantage that no one else has, and we still get to keep the customer."

Neighborhoods transitioning from rural to semi-rural tend to present the most promising prospects when larger and better-funded natural gas entities are building out their piping networks into previously unconnected locales.

"If you have a big utility that is expanding their mains into your territory, you can see where the closest line is to tap into, and then you can start selling natural gas," Sheehan says.

Such was the case back in 1969 when Mike's dad, Fabian "Fabe" Sheehan, was helming the family business. Eager to modernize by getting on the gas grid, Bird Island's mayor asked Fabe about making a foray into natural gas for the good of the community. Son Mike was concurrently attending the Southern Technical Institute in Georgia, studying the gas industry, and it just so happened that Mike's class project was to engineer a municipal natural gas distribution system.

"So I designed the Bird Island distribution system for the class," Mike says. "I got an 'A' in the course, and we adopted my plan for our business."

Making the stretch

This Northwest Gas equipment is used for gas pressure reduction and odorization.

In Grand Rapids, Minn., another propane retailer is offering natural gas to some of its customers.

Product pricing is a key element when marketing the fuels.

"This year it's much more competitive," Gorham says. "You have to save people money or they won't hook up."

Prior to laying any pipe, you should have several hundred to a thousand customers lined up and ready to tie in, according to Gorham, citing the benefits of moving into developing communities that are easing onto the natural gas grid.

"The big companies don't build small systems" branching off their main mains, he says. "There's a reason that these leftovers are left over" for propane-oriented proprietors to pursue as an added source of revenue.

"The pipes are there, and we'll build the connecting pipe," Gorham says, harkening back to when Northwest Gas entered the natural gas arena in 1992. "I decided that I didn't want to be 100 percent propane by the year 2000. We had 20 to 30 years of pipeline-laying experience, we already knew how to do it, and it wasn't that big of a stretch."

The natural gas proposition

This Northwest Gas photo shows a gas-fired waterbath line heater installed to heat the system gas.

Offering natural gas is a highly location-specific proposition dependent on several factors, such as having a suitable natural gas-welcoming population density or a large commercial customer that's already awaiting your services, according to consultant Casey Whelan, vice president of strategic initiatives at **U.S. Energy Services**.

"You need to be reasonably close to a pipeline as a source for gas, and you really have to understand the potential customer base," he says. "Find out the propensity of the customer to convert. The starting price tag is always in excess of a million dollars, and that's why you need to have the load to offset that capital cost."

Obtaining official permissions can be a challenge, as well. Minnesota's utilities commission environment allows for regulatory controls at the local level. Other jurisdictions might be fundamentally geared toward working with giant utilities or otherwise prone to creating hurdles for smaller enterprises.

"Some states make it easy and some make it difficult – not necessarily on purpose. It varies across the board," says consultant Tom Jaenicke of **Warm Thoughts Communications**.

"It depends on the regulatory atmosphere in your state; it all depends upon the local regulatory scene," he adds. "You have a lot of hoops to jump through, but it's all scalable depending on the size of the system you want to build."

A Coriolis meter installed in the high-pressure piping coming from the transmission line measures incoming gas.

It remains unclear as to exactly how many propane-centric businesses are additionally offering natural gas, but it appears LP gas bona fides remain intact, even if propane retailers have taken that natural gas path.

"Our largest member, AmeriGas, is also in the natural gas business," he notes, adding, "[But] I've heard of no big trend among our membership to do that."

Referring to baseline natural gas pipeline construction cost of about $1 million per mile, Petrash says, "It's a tough one to crack, in that a natural gas network is pretty darned expensive. In places with tough geography, it's even more expensive."

The fight for fairness

Natural gas has been a hot topic among leaders at the national and state levels of the propane industry, but for reasons that they believe create an uneven playing field for propane marketers. Natural gas utilities are using state legislatures and public utility commissions to help their businesses expand into propane country unfairly, the propane industry says. According to the National Propane Gas Association (NPGA), there were about 40 proposals across the country last year to use taxpayer money or existing ratepayers to subsidize the cost of this expansion. NPGA held an educational session on the topic at this year's Propane Expo in Nashville, Tenn.

This article is tagged with amerigas, LP gas, Mike Gorham, Mike Sheehan, national propane gas association, natural gas, Northwest Gas, NPGA, Sheehan's LP Gas Co., U.S. Energy Services, Warm Thoughts Communications and posted in Current Issue

Digital Edition

LPGas TOP RETAILERS

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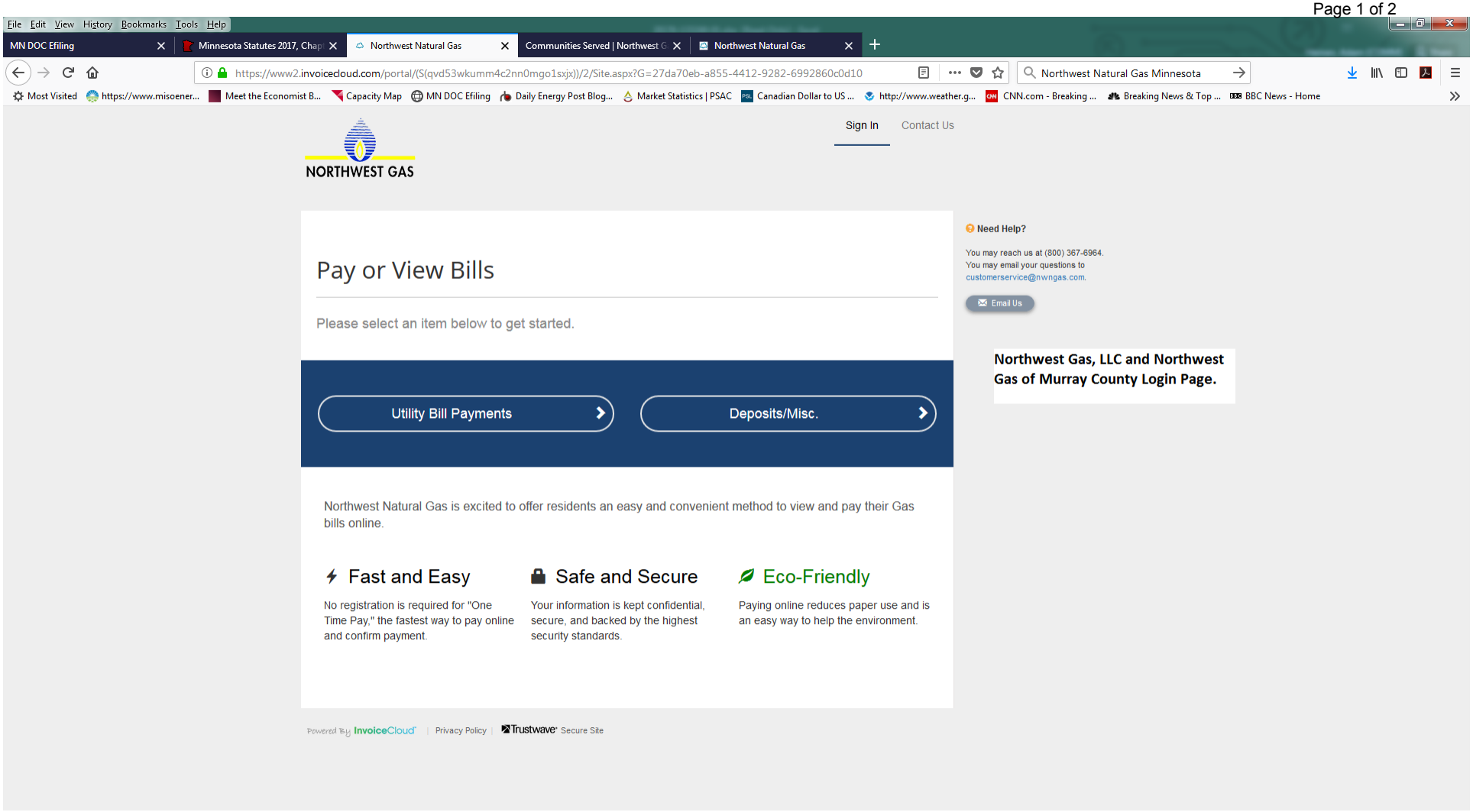
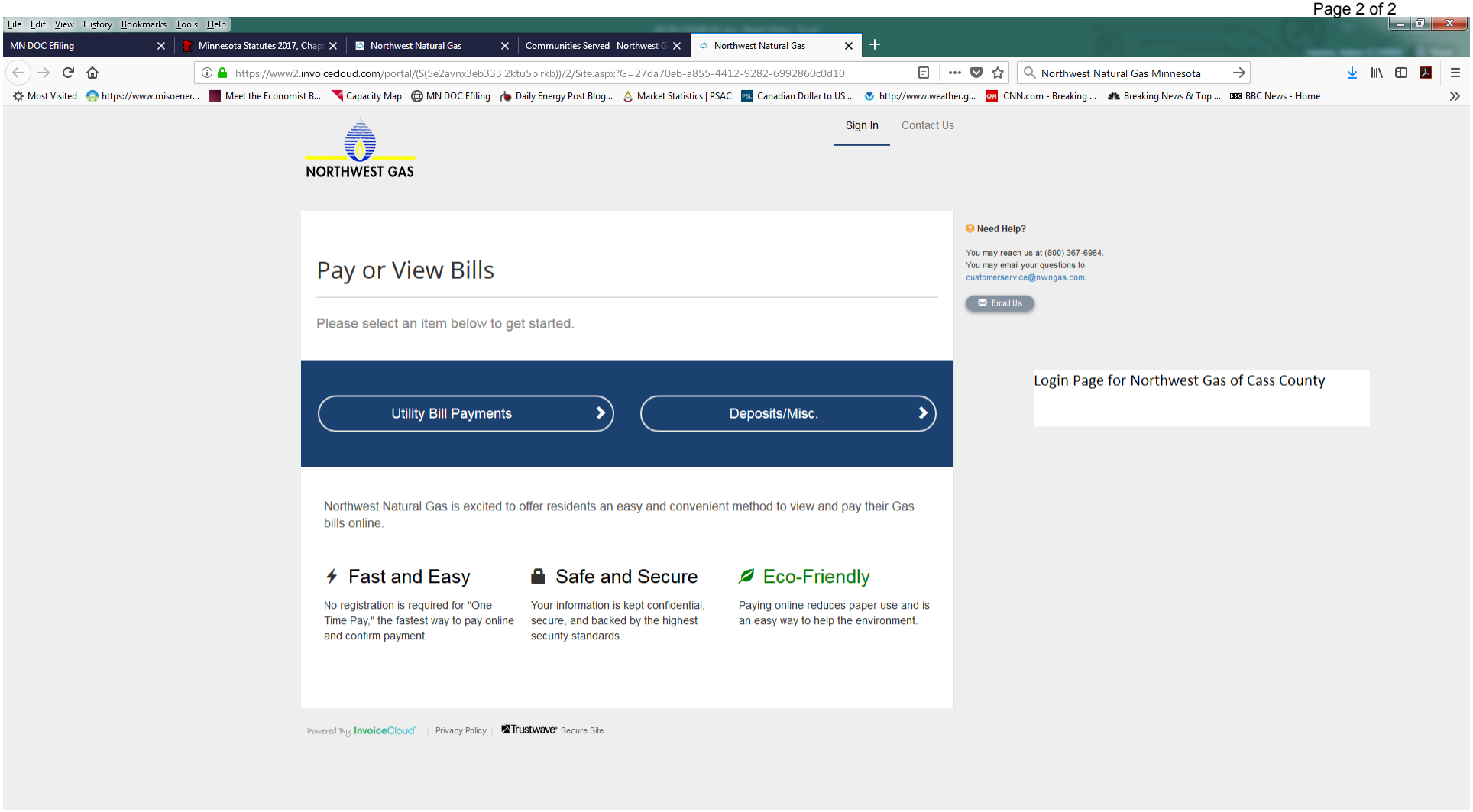


Northwest Gas, LLC and Northwest Gas of Murray County Login Page.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NORTHWEST GAS

Making Natural Gas Available to Rural Communities of Minnesota

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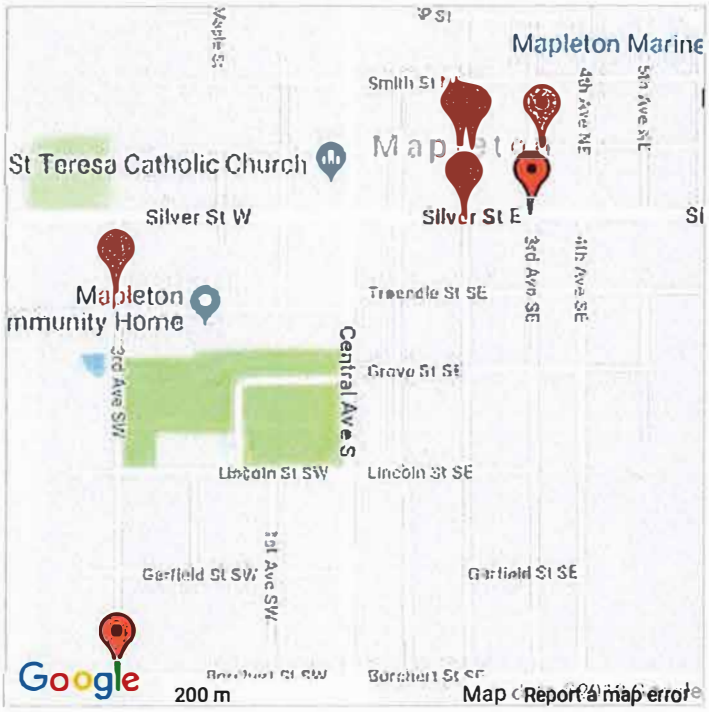
314 Main Street, NE
Mapleton, MN 56065
507-524-4103
http://nwngas.com



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Larry's Used Cars & Body Shop
112 3rd Street SW

Cass Lake
Teal's Super Value
604 Lyle Chrisholm Drive NW

Currie
Currie City Hall
801 3rd Street

Dovray
Dovray Community Center
260 Woodman Avenue

Fulda
Fulda City Hall
102 3rd Street. NE

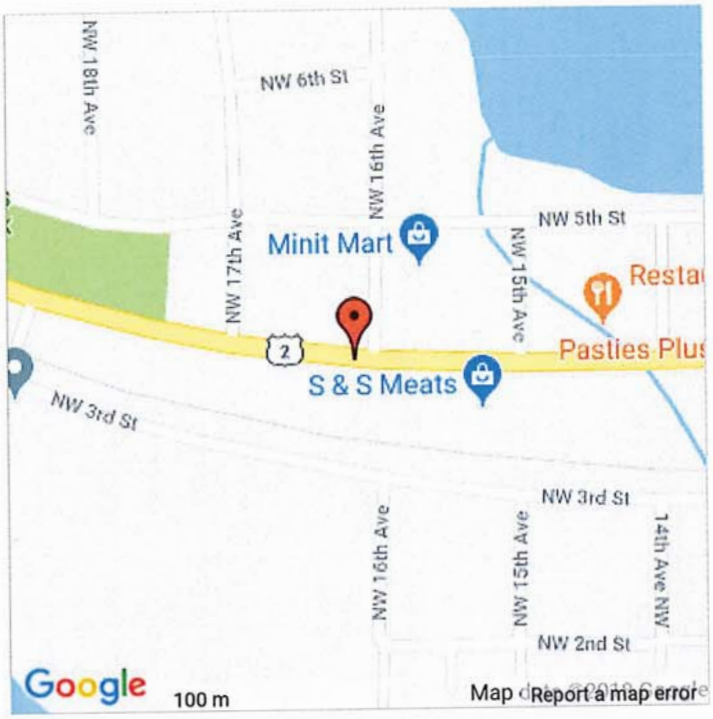
Henderson
Wagar's Store
422 Main Street

Ogilvie
Double J. Café
300 Highway 23 W

Slayton
Jim's Market
2525 20th Street

Grand Rapids

Northwest LP Gas
1608 NW 4th Street



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MINNESOTA NATURAL GAS UTILITY INFORMATION REPORTING

7610.0914 SALES BY CUSTOMER CATEGORY

Subpart 1. Sales of 3,000,000 Mcf or more. Utilities with annual Minnesota sales during the last calendar year of 3,000,000 Mcf or greater shall provide historic and forecast data on sales to ultimate customers and the number of customers during the last calendar year, the present year, and the subsequent first through fifth, tenth and 15th years for:

A. residential firm sales;
B. commercial firm sales;
C. commercial interruptible sales;
D. industrial firm sales;
E. industrial interruptible sales; and
F. total annual gas consumed in Minnesota, which is the sum of items A to E.

Subpart 2. Sales of less than 3,000,000 Mcf.
Utilities with annual Minnesota sales during the last calendar year of less than 3,000,000 Mcf shall provide data on sales to ultimate customers and the number of customers for the categories listed in

NOTE: The table below should be filled in only by utilities with annual Minnesota sales during the last calendar year of less than 3,000,000 Mcf. Do not include gas company use.

7610.0914, SUBPART 2. SALES BY CUSTOMER CATEGORY

It is recognized that there may be circumstances in which the data entered by the utility is more appropriate or accurate than the value in the corresponding automatically-calculated cell. If the value in the automatically-calculated cell does not match the value that your utility entered, please provide an explanation in the Comments area at the bottom of the worksheet.

	Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 7 CALC	
2016	Residential Firm	Commercial Firm	Commercial Interruptible	Industrial Firm	Industrial Interruptible	Electricity Generation	Total	CALCULATED Total	CALCULATED from Basic Forecast Past Year
No. of customers (at year's end)	1,322	146		10			1,478	1,478	
Mcf Sales *	56,043	32,270		37,659			125,972	125,972	0
Mcf Transportation**								0	0

* Total should equal Column 1, of the Content of Annual Report - Basic Forecast and Current Data (In Mcf) for the past year.

** Transportation refers to natural gas transported through a gas utility's distribution system but bought by customers from sources other than the gas utility.
Total should equal the sum of columns 2 and 3 of the Content of Annual Report - Basic Forecast and Current Data (In Mcf) for the past year.

COMMENTS

MINNESOTA NATURAL GAS UTILITY INFORMATION REPORTING

7610.0914 SALES BY CUSTOMER CATEGORY

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A. residential firm sales;
B. commercial firm sales;
C. commercial interruptible sales;
D. industrial firm sales;
E. industrial interruptible sales; and
F. total annual gas consumed in Minnesota, which is the sum of items A to E.

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NOTE: The table below should be filled in only by utilities with annual Minnesota sales during the last calendar year of less than 3,000,000 Mcf. Do not include gas company use.

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	Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 7 CALC	
2017	Residential Firm	Commercial Firm	Commercial Interruptible	Industrial Firm	Industrial Interruptible	Electricity Generation	Total	CALCULATED Total	CALCULATED from Basic Forecast Past Year
No. of customers (at year's end)	1,265	201	0	0	17	0	1,483	1,483	
Mcf Sales *	80,137	55,720	0	0	52,597	0	188,454	188,454	#REF!
Mcf Transportation**	0	0	0	0	0	0	0	0	#REF!

* Total should equal Column 1, of the Content of Annual Report - Basic Forecast and Current Data (In Mcf) for the past year.

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COMMENTS

MINNESOTA NATURAL GAS UTILITY INFORMATION REPORTING

7610.0914 SALES BY CUSTOMER CATEGORY

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A. residential firm sales;
B. commercial firm sales;
C. commercial interruptible sales;
D. industrial firm sales;
E. industrial interruptible sales; and
F. total annual gas consumed in Minnesota, which is the sum of items A to E.

Subpart 2. Sales of less than 3,000,000 Mcf.
Utilities with annual Minnesota sales during the last calendar year of less than 3,000,000 Mcf shall provide data on sales to ultimate customers and the number of customers for the categories listed in

NOTE: The table below should be filled in only by utilities with annual Minnesota sales during the last calendar year of less than 3,000,000 Mcf. Do not include gas company use.

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	Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 7 CALC	
2017	Residential Firm	Commercial Firm	Commercial Interruptible	Industrial Firm	Industrial Interruptible	Electricity Generation	Total	CALCULATED Total	CALCULATED from Basic Forecast Past Year
No. of customers (at year's end)	1,805	216	0	2	23	0	2,046	2,046	
Mcf Sales *	116,961	41,183	0	27,568	60,467	0	246,179	246,179	#REF!
Mcf Transportation**	0	0	0	0	0	0	0	0	#REF!

* Total should equal Column 1, of the Content of Annual Report - Basic Forecast and Current Data (In Mcf) for the past year.

** Transportation refers to natural gas transported through a gas utility's distribution system but bought by customers from sources other than the gas utility.
Total should equal the sum of columns 2 and 3 of the Content of Annual Report - Basic Forecast and Current Data (In Mcf) for the past year.

COMMENTS

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
Public Comments

Docket No. PL6580/M-18-465

Dated this 29th day of August 2018

/s/Sharon Ferguson

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.	202 S. Main Street Le Sueur, MN 56058	Electronic Service	No	OFF_SL_18-465_M-18-465
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-465_M-18-465
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_18-465_M-18-465
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_18-465_M-18-465
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Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.	202 South Main Street P.O. Box 68 Le Sueur, MN 56058	Electronic Service	No	OFF_SL_18-465_M-18-465
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.	PO Box 68 202 South Main Street Le Sueur, MN 56058	Electronic Service	No	OFF_SL_18-465_M-18-465
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_18-465_M-18-465