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March 18, 2022

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

Re: Docket 21-693

Dear Mr. Seuffert:

This letter provides the reply comments of Paul Bunyan Natural Gas (PBNG) to Mr. John Kundert's comments of January 21, 2022 on the above referenced docket.

Regarding the three questions posed in Mr. Kundert's comments:

- There were no municipally approved rate changes in 2021, and none were proposed.
- During the Cold Weather Rule months, all customers receive the same notice. The Company does use a modified notice during the months not covered by the Cold Weather Rule. We also modify the language used in the notice for specific circumstances, such as availability of COVID-19 relief funds. An example from last summer is included with this filing.
- The customer count information provided was indeed based on the number of customers.

A map of PBNG's current service territory is included with this filing. The lines shown in blue are existing mains and those shown in dashed pink are planned for construction this summer.

PBNG has begun tracking customer complaints in accordance with Minnesota Rule 7820.0400. The process is currently a manual one, but we are also working with our billing software vendor to determine whether our existing system can be modified to capture and provide reporting on customer complaints.

In addition, at Mr. Kundert's request, we offer our response to the comments filed by the Leech Lake Band of Ojibwe Tribal Employment Rights Office (TERO). While we respect the Band's right to seek compliance with their TERO laws, we do not believe such compliance affects our eligibility for ESGU status. We therefore request that, if the Commission does grant ESGU status to PBNG, our ESGU status will not be contingent upon any express or implied agreement to compliance with TERO laws.

Sincerely,

Rachel Sorrentino  
Chief Manager