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January 11, 2017

VIA ELECTRONIC FILING

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

Re: Petition for Approval of Firm Transportation Agreement
Docket No. PL6580/M-16-1026

Dear Mr. Wolf:

Greater Minnesota Transmission, LLC (“GMT”) filed its Petition for Approval of a Firm Gas Transportation Agreement on December 7, 2016. The Minnesota Department of Commerce, Division of Energy Resources (“the Department”) filed its Comments on January 6, 2017. This letter serves as GMT’s Reply, submitted in lieu of filing Reply Comments.

GMT appreciates the Department’s carefully considered analysis and its recommendation that the Commission approve the Agreement. GMT agrees to include the UNG project in its annual load utilization factor report, as recommended by the Department.

As the Department noted, GMT and United Natural Gas, LLC (“UNG”) previously partnered in a similar agreement to bring gas to the Lafayette and Courtland areas; and, in a tangential docket, UNG was granted a small gas utility exemption. The Department requested that either GMT or UNG address the impact of the instant agreement, if any, on UNG’s exemption in reply comments. GMT respectfully notes that, since UNG is not a party to the docket, it would not be submitting reply comments. GMT communicated with UNG and has been advised that UNG intends to file a request to extend its exemption to cover the area in question in this agreement. GMT also respectfully submits that, given the Commission’s prior discussions, the Commission would not be inclined to consider the issue of whether UNG intends to seek (or would be granted) extension of its exemption in this docket;¹ and, that Commission consideration can proceed without regard to the status of any prospective filing by UNG.

¹ . A question related to UNG’s prospective exemption application was raised by Commission staff in preparation for the Commission’s consideration of a similar transportation agreement in Docket No. PL6580/M-15-1041. While GMT, the Department, and Commission Staff then provided information about the exemption-related question in that docket, the Commission ultimately indicated during its agenda meeting discussion that questions related to UNG’s prospective exemption application were not relevant to the transportation agreement docket at issue.



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GMT submits that no additional issues require discussion prior to the Commission's consideration. Furthermore, GMT respectfully requests that the matter be placed on the earliest available Commission agenda.

Thank you for your consideration. Please do not hesitate to contact me should there be any questions or concerns.

Sincerely,

GREATER MINNESOTA TRANSMISSION, LLC

/s/

Kristine A. Anderson
Corporate Attorney

cc: Service List