

January 8, 2019

Via Electronic Filing

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

Re: In the Matter of the Application of Great Plains Natural Gas Co. for a Pipeline Routing Permit for the Fergus Falls Pipeline Replacement Project in Otter Tail County, Minnesota, Docket No.: G-004/GP-16-685

Reply Comments of Great Plains Natural Gas Co.

Dear Mr. Wolf:

Pursuant to the Minnesota Public Utilities Commission's ("Commission") December 21, 2018 Notice of Comment Period, Great Plains Natural Gas Co. ("Great Plains"), a Division of Montana-Dakota Utilities Co., respectfully files its Reply Comments in response to the Minnesota Department of Commerce's January 4, 2019 Initial Comments. In its Comments, the Department highlights comments received by Minnesota Department of Natural Resources ("DNR") and ultimately recommends that the Commission accept Great Plains' Certificate of Completion of the Fergus Falls Pipeline Replacement Project ("Project") upon Great Plains providing confirmation that "landowners affected by Project construction activities have signed releases indicating that the right-of-way on their property has been restored to the conditions that existed before construction."

Great Plains hereby confirms that it has received such releases from private landowners affected by the Project (primarily related to crop damage and de-compaction). In addition to the private landowners, Great Plains confirms that it has restored all road rights-of-way (e.g., Deerfield Drive maintenance and re-gravel Weyren Road) impacted by the Project.

Finally, a substantial portion of the Project route runs through the Fergus Falls Wildlife Management Area ("WMA"), which is owned and managed by the DNR. As the Department notes in its Comments, DNR has indicated that "the Commission should accepted the certificate of completion, but it should be acknowledged that there is minimal fence work yet to be completed." Great Plains agrees with DNR. As DNR notes, the fencing work was suspended due to weather constraints in the fall. Great Plains will work with DNR to ensure the fencing is complete as soon as possible this spring.

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Great Plains appreciates the work of the Commission, Department and DNR on this important Project. Please do not hesitate to contact me with any questions or concerns.

Respectfully submitted,

/s/ Brian M. Meloy

Brian M. Meloy

Attorney for Great Plains Natural Gas Co.

STATE OF MINNESOTA BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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| In the Matter of Great Plains Natural |) | MPUC Docket No. G004/GP-16-685 |
| Gas Co.'s Application for a Gas |) | |
| Pipeline Routing Permit for the Fergus |) | CERTIFICATE OF SERVICE |
| Falls Pipeline Replacement Project |) | |
| |) | |

The undersigned hereby certifies that true and correct copies of the Reply Comments of Great Plains Natural Gas Co. has been served on this day by e-filing/e-serving to the following:

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Dated this 8th day of January, 2019

/s/ Dylan M. Stanek
Dylan M. Stanek