

705 West Fir Ave.  
Mailing Address:  
P.O. Box 176  
Fergus Falls, MN 56538-0176  
1-877-267-4764

July 10, 2020

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

RE: Docket No. G004/M-20-448  
Reply Comments to the Comments of the  
Minnesota Department of Commerce, Division of  
Energy Resources

Dear Mr. Seuffert:

Great Plains Natural Gas Co. (Great Plains), a Division of Montana-Dakota Utilities Co., herewith submits its Reply Comments to the Comments of the Staff of the Department of Commerce (Department) filed on July 1, 2020, regarding Great Plains' 2019 Conservation Improvement Program (CIP) Tracker and Shared Savings Demand Side Management Incentive Report.

Great Plains appreciates the Department's thorough review of the CIP Tracker and agrees with the Department's recommendation and requests that the Deputy Commissioner approve its 2019 CIP Status Report. However, as noted in Great Plains' April 30, 2020 filing, Great Plains prepared this filing with certain assumptions regarding the implementation of the CCRA, including the CCRC rate change proposed in the pending general rate case (Docket No. GR-19-511), and therefore does not agree with Staff's recommendation to remove the CCRC rate change and include an updated tariff with a January 1, 2021 effective date in its Reply Comments.

While Great Plains can appreciate the Department's concerns regarding the tariff, the Company continues to propose the simultaneous implementation of both the new CCRA and the CCRC rates. Great Plains proposes to submit the same Conservation Improvement Program Adjustment Clause tariff in both dockets' compliance filings<sup>1</sup>, noting both dockets and the effective date on the tariff sheet. While the Company's assumptions in this docket included a January 1, 2021 effective date for both the CCRA and final rates in the Company's rate case, if final rates are effective prior to January 1, 2021, the Company proposes the new CCRA rate also be effective at that time.

Great Plains agrees to include a bill message on customers' bills and agrees with the Department's proposed bill message with the exception of the phrase "as shown in the Resource Adjustment above," which should be removed from the bill message proposed by

---

<sup>1</sup> The general rate case Docket No. GR-19-511 and this Docket M-20-448.

the Department as the CCRA is now referred to as "CCRA Factor" on customers' bills. The bill message will be included on customers' bills the month the rate is implemented.

If you have any questions regarding this filing, please contact me at (701) 222-7855, or Brian M. Meloy, at (612) 335-1451.

Sincerely,

*/s/ Travis R. Jacobson*

Travis R. Jacobson  
Director of Regulatory Affairs

cc: Brian Meloy  
Service List