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December 8, 2020

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

RE: Reply Comments to the Department of Commerce

In the Matter of Great Plains' Refund Plan for Northern Natural Gas and Viking

Gas Transmission Pipelines and Request for a Rule Variance

Docket No. G004/M-20-813

Dear Mr. Seuffert:

Great Plains Natural Gas Co. (Great Plains), a Division of Montana-Dakota Utilities Co., herewith electronically submits its Reply Comments to the Comments of the Department of Commerce, Division of Energy Resources (Department) filed on December 3, 2020, regarding Great Plains' Refund Plan for Northern Natural Gas and Viking Gas Transmission Pipelines and Request for a Rule Variance.

The Department recommends approval of Great Plains' refund plan, variance to calculate refund amount using four months of actual usage, and for the Commission to require Great Plains to report status of the refund after it is completed.

Great Plains agrees with these recommendations of the Department. Great Plains will submit a compliance filing after the completion of the refund with information relating to amounts returned by bill credits, issuance of checks and any un-refunded monies.

As discussed in the original filing on November 4, 2020, the refund plan is a result of the two pipeline companies' interim rates which were a component of Great Plains' cost of gas rates and therefore have no impact on Great Plains' distribution rates or services. The amounts to be refunded based on consumption by customer classes is as follows:

	Rate per ak
Residential (N/S 60)	\$0.4044
Firm General Service (N/S 70)	\$0.4044
Small Interruptible Sales & Transportation (N/S 71 and 81)	\$0.2343
Large Interruptible Sales & Transportation (N/S 82 and 85)	\$0.2343

The attorney that represents Great Plains on this matter is:

Brian Meloy Stinson LLP 50 South Sixth Street, Suite 2600 Minneapolis, MN 55402 (612)335-1451

If you have any questions regarding this filing, please contact Travis R. Jacobson at (701) 222-7855, or Brian Meloy.

Sincerely,

/s/Travis R. Jacobson

Travis R. Jacobson Director of Regulatory Affairs

cc: Brian Meloy Service List