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December 22, 2020

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

RE: In the Matter of a Petition by Great Plains Natural Gas Co., a Division of

Montana-Dakota Utilities Co., for Authority to Increase Natural Gas Rates in

Minnesota

PUC Docket No. G004/GR-19-511 OAH Docket No. 65-2500-36528

and

CIP Tracker and Demand Side Management Incentive

PUC Docket No. G004/M-20-448

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 Minnesota Department of Commerce, Division of Energy Resources (Department) filed on December 15, 2020. The Department's comments respond to Great Plains' November 12, 2020 Compliance Filing submitted pursuant to the Minnesota Public Utilities Commission's (Commission) October 26, 2020 Findings of Fact, Conclusions of Law and Order issued in Docket No. G004/GR-19-511.

Great Plains agrees with the Department's recommendation that the Commission approve the Compliance Filing. Consistent with the Department's recommendation, Great Plains also agrees to file a compliance filing within ten days after final rates become effective resubmitting its CIP tracker account for the period in which interim rates were in effect.

Great Plains also notes that on November 10, 2020, the Company filed a Compliance Filing in accordance with Commission's November 4 Order approving Great Plains' 2019 Conservation Improvement Program Status Report and CIP Tracker and Demand Side Management Incentive (Docket No. G004/M-20-448). In its CIP Compliance Filing, Great Plains included tariff sheets to be effective with service rendered on and after January 1, 2021

However, the Company now recognizes that its CIP Compliance Filing in Docket No. G004/M-20-448 should be made simultaneously with the Final Compliance Filing in Docket No. G004/GR-19-511. Therefore, Great Plains clarifies that the tariff submitted in its November 10, 2020 CIP Compliance Filing will be resubmitted simultaneously with the Final Compliance Filing in Docket No. G004/GR-19-511 and the tariff submitted November 10, 2020 will not be placed into effect with service rendered on and after January 1, 2021. Rather, the tariff will become effective simultaneously with final rates in Great Plains' general rate case in Docket No. G004/GR-19-511.

If you have any questions regarding this filing, please contact me at (701) 222-7856, or Brian Meloy at (612) 335-1451.

Sincerely,

/s/ Travis R. Jacobson

Travis R. Jacobson Director of Regulatory Affairs

cc: Service List Brian Meloy