March 11, 2021

Agenda Item 1

In the Matter of Greater Minnesota Gas, Inc.'s Petition for Change in Contract Demand Entitlement for the 2020-2021 Heating Season

Docket No. G022/M-20-391

Chair Sieben proposes the following additional decision option 3.a.

Decision Options

- 1. Accept Greater Minnesota Gas' proposed entitlement level and resulting reserve margin. (Department)
- Allow Greater Minnesota Gas to recover demand costs associated with the Company's entitlements through the monthly Purchased Gas Adjustment effective April 1, 2020. (Department)
- 3. Require Greater Minnesota Gas to consider, to the extent cost effective options are available, purchasing additional entitlements for the 2020-2021 and future heating seasons. (Department, as modified by Staff)

<u>Or</u>

- 3.a. Require Greater Minnesota Gas to maintain a minimum reserve margin of 5% on a going-forward basis for the heating seasons; or fully explain any decision to use a less than 5% reserve margin.
- 4. Require Greater Minnesota Gas to include the following in future demand entitlement filings: (Department)
 - Use a constant annual average residential usage estimate based on weather normalized sales for the purpose of estimating customer rate impact;
 - Perform separate regression analyses by service area, using area-specific weather stations;
 - Estimate its design day using data from at least 3 heating seasons when appropriate. If the results of these calculations are not acceptable, the Department recommends that the Company fully explain its decision to use a shorter estimation period in its initial filing; and

•	Maintain, on a going-forward basis, a two-part design-day process involving both regression analysis and mathematical analysis based on the Company's historical all-time peak-day send-out.