

1900 Cardinal Lane Faribault, MN 55021 Toll Free: (888) 931-3411 www.greatermngas.com

November 1, 2024

VIA ELECTRONIC FILING

Mr. Will Seuffert Executive Secretary Minnesota Public Utilities Commission 121 7th Place East, Suite 350 St. Paul, MN 55101-2147

Re: In the Matter of the Application of Greater Minnesota Gas, Inc. for Authority to

Increase Rates for Natural Gas Utility Service in Minnesota

Docket No. G-022/GR-24-350

SOME SCHEDULES — CONTAIN TRADE SECRET DATA

Dear Mr. Seuffert:

Pursuant to Minnesota Statutes Chapter 216B, Greater Minnesota Gas, Inc. ("GMG") hereby submits for filing materials related to its Application for Authority to Increase Natural Gas Rates ("Application"). The Application, consisting of Volumes 1 through 3, includes a Notice of Change in Rates, the rate schedules which contain the changes in rates, the testimony, exhibits, schedules supporting the changed rates, and the information required by the Commission's rules for changes in rates (Minnesota Rules, Parts 7825.3100-7825.4600), as well as compliance items ordered by the Commission in prior proceedings. Also enclosed, please find GMG's Petition for Interim Rates with supporting schedules and interim tariffs, all of which is contained in Volume 4 of the documents submitted herewith.

The Test Year for the rate filing is the year ending December 31, 2025. The return on equity for the rate proposal is 10.00%, which is consistent with the currently authorized return for GMG.

As the evidence in support of the Application indicates, GMG's operations are efficient and costeffective. All information presented in support of the Application is based upon the financial condition of GMG's operations as a stand-alone distribution utility.

GMG has a long-standing commitment to providing reliable, customer-oriented service at reasonable rates. This general rate increase will enable GMG to fulfill its continuing commitment to its customers while maintaining GMG's financial health under changing market conditions and increased operating costs. The proposed changes reflect uniform increases across customer classes, maintaining GMG's currently approved rate design. The proposed rates will generate sufficient revenues to allow GMG to earn a fair and reasonable return on the investment required to meet customer needs and expectations. Without the proposed rate



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changes, GMG will incur a projected revenue deficiency of \$1,422,431 in the test year ending December 31, 2025.

All notices, orders, correspondence and communications concerning this filing should be addressed to:

Cody J. Chilson, President Greater Minnesota Gas, Inc. 1900 Cardinal Lane Faribault, MN 55021 888-931-3411

and to GMG's attorneys:

Kristine Anderson, Esq. Greater Minnesota Gas, Inc. 1900 Cardinal Lane Faribault, MN 55021 507-209-2110

Eric F. Swanson, Esq. Winthrop & Weinstein, P.A 225 South 6th Street, Suite 3500 Minneapolis, MN 55402 612-604-6400

Please note that certain portions of the documents in Volume 3 contain non-public trade secret data and GMG respectfully requests that the material remain protected from public view. Accordingly, GMG submits both public and non-public versions of Volume 3 herewith. Relevant pages containing non-public trade secret information are marked as such and public versions, in which the trade secret information has been excised, are also submitted herewith. GMG maintains that the trade secret information meets the statutory criteria for protection because the information is supplied by GMG; GMG makes extensive efforts to maintain the secrecy of the information and does not make the information available outside of GMG except to other parties involved in contracts and requisite regulatory agencies; GMG derives independent economic value from the information not being generally known to the public and competitors. If publicly released, this information would have economic value to GMG's suppliers or competitors, to the detriment of GMG and its customers. Therefore, GMG respectfully requests that such non-public trade secret information not be disclosed to any other party without prior notification to, and the written consent of, GMG.



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All individuals on the attached service list have been served as appropriate.

Thank you for your assistance. Please do not hesitate to contact me should you have any questions or concerns or if you require additional information. My direct dial number is (507) 209-2110 and my email address is kanderson@greatermngas.com

Sincerely,

GREATER MINNESOTA GAS, INC.

/s/Kristine A. Anderson Corporate Attorney

Enclosures

cc: Service List