



A Division of Montana-Dakota Utilities Co.

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September 29, 2025

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

**RE: Docket No. E,G-999/PR-25-2
In the Matter of Cold Weather Reports (CWR) – Regulated Gas and
Electric Companies – Compliance Filing**

Dear Ms. Bergman:

Great Plains Natural Gas Co. (Great Plains), a Division of Montana-Dakota Utilities Co., herewith electronically submits its compliance filing pursuant to the Minnesota Public Utilities Commission's Order dated August 28, 2025 (August 28 Order) in the above referenced docket.

In compliance with Order Point 1 of the August 28 Order, Great Plains is providing the Company's current policies and practices on disconnections, service deposits, and payment agreements in Attachment A. The Company will comply with Order Point 3 and file in Docket No. E,G-999/PR-YR-2 in the event these policies and practices are updated in the future.

Regarding Order Points 4 and 7 of the August 28 Order, Great Plains does not currently require service deposits to restore service or down payments to start a payment arrangement as reported in its Residential Customer Status Report each month.

The Company is currently reviewing its communication material surrounding disconnections and payment arrangements and will submit any customer-facing material to the CAO for review and approval in compliance with Order Point 5 and 6 of the August 28 Order. Following approval from the CAO, the Company will post the approved language on the Company's website and in printed disconnection communication materials.

Lastly, Great Plains will provide a discussion in its next Gas Service Quality report in 2026 regarding disconnections due to a landlord's failure to pay, consistent with the requirements in Minn. R. 7820.1400 and how the Company has implemented

the statutorily required consideration of both financial and extenuating circumstances for payment agreements during CWR and non-CWR months.

If you have any questions regarding this filing, please contact me at (701) 222-7855 or Kristin Stastny at (612) 977-8656.

Sincerely,

/s/ Travis R. Jacobson

Travis R. Jacobson
Vice President of Regulatory Affairs

cc: Kristin Stastny

**Great Plains Natural Gas Co.
Summary of Disconnection, Service Deposit, and Payment Arrangement
Practices and Policies in Minnesota
September 2025**

Collections and Disconnection Process

Great Plains actively engages with customers to avoid disconnection by working with customers who are unable to pay their full past due balance by setting up a payment arrangement that works for them and providing contact information for energy assistance in various forms of contact including phone, email reminders (if opted in to receive), bill inserts and the Company's website.

A residential account enters the collections process once a customer's past due balance reaches \$25 and has aged at least 36 days. When an account meets this debt criteria, Great Plains' billing system directs accounts that are not deemed a significant risk to a low or medium risk path. Weighted factors such as the age of the debt, the number of days since the last payment, the amount of the payment and how long the customer has been in service are used to determine risk. An account is then given a behavior score for the account each time the account is reviewed for collections. Additional factors, such as an account not having phone contact information, if the customer has arrears on multiple accounts under their name, or if payment in the last 60 days was returned for non-sufficient funds can adjust the score or collection path.

Customer accounts entering the low-risk path receive an automated call reminding customers of their past due balance and to make a payment. If an account is moved or starts at medium risk, an automated call will be placed and a reminder letter mailed to the customer. Accounts entering the high-risk path will follow the Company's normal collection process which includes automated calls, appropriate letters of disconnection based on the season and an agent-led call prior to scheduling disconnection. If the customer does not make payment or calls in to set up a payment arrangement, the customer will be mailed a disconnection notice 10 days prior to disconnection during the non-Cold Weather Rule period of May 1 through September 30 and 15 days during the Cold Weather Rule period of October 1 through April 30.

The Company follows the Cold Weather Rules outlined in Minn. Stat. 216B.096.

Service Deposits

Great Plains does not require service deposits to start service.

Payment Arrangements

Great Plains understands that circumstances can make it difficult for customers to make payment on their billing. The Company offers payment arrangements that are based on a customer's unique circumstances to avoid disconnection and to pay down past due balances.

Customers have a number of self-service options to establish a payment plan and avoid disconnection including logging into the Company's Online Account Services, utilizing the IVR system when calling into the Company's customer service line, visiting with a Customer Service Representative, or making a request through email or chat. Customers who contact the Company regarding their past due balance are also advised of energy assistance options that may be available to them based on their financial situation.

Once a payment plan is established, any collection or disconnection process is stopped. If a customer fails to make their scheduled payment, the Company attempts an agent-led outbound call to re-establish payment terms. If no payment or arrangement is received, the collections or disconnection process restarts.

Following the Cold Weather Rules (CWR) outlined in Minn. Stat. 216B.096, Great Plains offers Cold Weather Rule protection for residential customers from October 1st through April 30th. A disconnected due to non-payment customer or a customer that has received a disconnection notice that requests CWR protection will be entered into a payment arrangement to have their service turned back on. If a satisfactory agreement between the customer and Company cannot be reached, the customer is eligible to file an appeal with the Minnesota Public Utilities Commission. The Commission will determine if the customer appeal is accepted and, upon acceptance, will determine an acceptable payment arrangement.