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May 21, 2021

Executive Secretary
North Dakota Public Service
Commission
State Capitol Building
Bismarck, ND 58505

Re: Cost of Gas Adjustment (COG)
Rate 88
Case No. PU-21-010

Great Plains Natural Gas Co. (Great Plains), a Division of Montana-Dakota Utilities Co., herewith electronically submits a waiver request to the Gas Cost Reconciliation (GCR).

Section 4 of Great Plains' Cost of Gas – Natural Gas Rate 88 Tariff references the Gas Cost Reconciliation calculation to be performed annually effective in June of each year and references the time and manner of filing. Great Plains is requesting a waiver to these provisions as a result of the significant natural gas price increase due to the cold weather event in February 2021. As such, Great Plains requests Commission approval to implement a change to the GCR effective of July 1, 2021, with an extended timeframe of recovery over twenty-three months. This timeframe would reconcile with the expected GCR filing to be made and implemented June 1, 2023. This extended timeframe would allow for a mitigated impact to customers while also allowing recovery of costs incurred by Great Plains. Great Plains asserts this will benefit its customers and is in the public interest.

The provided Attachment A demonstrates Great Plains' current under-recovered gas cost balance as of April 30, 2021 and incorporates the extended recovery timeline through May 31, 2023 to help mitigate the impact to customers.

If you have questions regarding this filing, please contact me at (701) 222-7855 or travis.jacobson@mdu.com

Sincerely,

s/ Travis R. Jacobson

Travis R. Jacobson
Director of Regulatory Affairs

**GREAT PLAINS NATURAL GAS CO.
GAS COST RECONCILIATION ADJUSTMENT
APPLICABLE TO NORTH DAKOTA
FIRM
TO BE EFFECTIVE JULY 1, 2021 THROUGH MAY 31, 2023**

(Over)/under recovered gas costs @ April 30, 2021: \$593,350

Less projected recovery from rates already established:

	Volume	Rate	Amount
May	8,100	\$0.0000	\$0

Additional recovery required \$593,350

Projected sales volumes (dk)

July 2021	4,900	
August	4,900	
September	6,500	
October	19,500	
November	34,200	
December	49,100	
January 2022	54,900	
February	45,600	
March	36,700	
April	20,700	
May	8,200	
June	4,800	
July	5,000	
August	5,000	
September	6,600	
October	19,600	
November	34,400	
December	49,400	
January 2023	55,200	
February	45,800	
March	36,900	
April	20,900	
May	8,200	
Total		<u>577,000</u>

Total gas cost reconciliation adjustment
to be effective July 1, 2021 through May 31, 2023. \$1.0283

**GREAT PLAINS NATURAL GAS CO.
GAS COST RECONCILIATION ADJUSTMENT
APPLICABLE TO NORTH DAKOTA
INTERRUPTIBLE
TO BE EFFECTIVE JULY 1, 2021 THROUGH MAY 31, 2023**

(Over)/under recovered gas costs @ April 30, 2021: \$1,569,371

Less projected recovery from rates already established:

	Volume	Rate	Amount
May	53,800	\$0.0000	\$0

Additional recovery required \$1,569,371

Projected sales volumes (dk)

July 2021	46,700	
August	39,900	
September	31,900	
October	51,600	
November	74,300	
December	88,200	
January 2022	87,900	
February	77,100	
March	73,800	
April	64,400	
May	53,800	
June	49,900	
July	46,700	
August	39,900	
September	31,900	
October	51,600	
November	74,300	
December	88,200	
January 2023	87,700	
February	77,100	
March	73,800	
April	64,400	
May	53,800	
Total		<u>1,428,900</u>

Total gas cost reconciliation adjustment
to be effective July 1, 2021 through May 31, 2023. \$1.0983