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November 4, 2021

Mr. Steve Kahl, Executive Secretary
North Dakota Public Service Commission
600 E. Boulevard Ave., Dept. 480
Bismarck, ND 58505-0480

RE: Application for Certificate of Public Convenience and Necessity
Dakota Natural Gas, LLC

Dear Mr. Kahl:

Enclosed herewith, please find Dakota Natural Gas, LLC's (DNG's) Application for a Certificate of Public Convenience and Necessity, submitted pursuant to N.D. Admin. Code § 49-03.1-01. The Application seeks such a Certificate to allow DNG to construct and operate the facilities described therein to provide natural gas service to the Portland, North Dakota area.

Please note that there are two versions of the document; namely, one that is redacted for public viewing and one that includes a non-public attachment containing trade secret information. The trade secret version is so marked. Ergo, DNG's Application for Trade Secret Protection is also enclosed, seeking protection for certain information appended to the Request as Attachments C and D along with a sealed envelope containing the protected Attachments.

DNG respectfully requests that the Commission consider the Application; that it give notice of an opportunity to request a hearing to interested parties and, if no hearing is requested within twenty days, that it waive the hearing in accordance with N.D.C.C. § 49-03.1-05; and, that it enter an Order approving DNG's Application and issue a Certificate of Public Convenience and Necessity authorizing DNG to construct and operate the natural gas distribution facilities at issue in the Application.

DNG respectfully requests that the Commission consider a reduced filing fee in light of the fact that this is a small extension of existing distribution facilities in the neighboring community and will not have any rate impact on DNG's existing customers; or, in the alternative, that the Commission consider a reduced filing fee initially, subject to submission of an additional filing fee if a hearing is requested.

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.



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Mr. S. Kahl
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Sincerely,

DAKOTA NATURAL GAS, LLC

s/
Kristine A. Anderson
Corporate Attorney (Minnesota) & Regulatory Affairs

Enclosure

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF NORTH DAKOTA**

Julie Fedorchak
Randy Christmann
Brian Kroshus

Chair
Commissioner
Commissioner

Case No. _____

**In the Matter of the Application of
Dakota Natural Gas, LLC for a
Certificate of Public Convenience
and Necessity to Construct and
Operate a Natural Gas Distribution
Line to Serve the City of Portland,
North Dakota**

**APPLICATION FOR
CERTIFICATE OF
PUBLIC CONVENIENCE
AND NECESSITY**

***PUBLIC DOCUMENT:
TRADE SECRET DATA EXCISED***

Dakota Natural Gas, LLC (DNG), respectfully requests that the North Dakota Public Service Commission (Commission) grant a Certificate of Public Convenience and Necessity pursuant to N.D.C.C. Ch. 49-03.1-01 for DNG to construct and operate the facilities described herein to provide natural gas service to some residents in the City of Portland, North Dakota and its environs.

OVERVIEW

DNG extended natural gas service to the communities of Hillsboro and Mayville North Dakota and their environs in 2021. DNG received inquiries about whether it could extend its distribution line to service the Portland community. Following a market study of the Portland community and an assessment of DNG's capacity, DNG determined that it is feasible to extend its existing distribution line to serve Portland area residents with natural gas.

In order to provide the requested service, DNG will need to extend its distribution pipeline that currently serves the Mayville area. A map of the proposed distribution line extension is appended hereto as Attachment A. DNG proposes construction of a pipeline described as follows:

DNG will fuse onto the end of the existing Mayville distribution system and add approximately 6.9 miles of additional distribution system pipe using 4" and 2" HDPE pipe.

DNG's timeline for construction of the line is subject to the requisite regulatory processes and DNG's goal is to secure regulatory approvals as soon as possible, with construction beginning early in 2022 and in-service occurring for the beginning of the 2022-2023 heating season. Hence, DNG hereby respectfully requests that the Commission determine that public

convenience and necessity requires or will require such construction and operation and issue a Certificate of Public Convenience and Necessity to DNG for the City of Portland and its environs.

GENERAL FILING INFORMATION

N.D.C.C. Ch. 49-03.1-03 requires DNG to provide certain information in its Application. Each of the requisite areas is addressed below.

A. Name, Address and Telephone Number of the Applicant

Dakota Natural Gas, LLC
1900 Cardinal Lane
P.O. Box 798
Faribault, Minnesota 55021
Telephone: (888) 933-9743

B. Applicant Business Authorization

Applicant is a limited liability company organized under the laws of North Dakota. As a public utility, it is subject to the jurisdiction of and regulation by the Commission pursuant to Title 49 of the North Dakota Century Code. DNG's current Certificate of Good Standing and Certificate of Organization issued by the North Dakota Secretary of State, as well as its Articles of Organization, are appended hereto as Attachment B.

C. Financial Statements

DNG is a relatively new company, with its first project having been put into service in late 2020 and its second project having been put into service for the current heating season. As such, it does not have sufficient financial information to provide alone at this time. Hence, a financial statement for DNG is appended hereto as Attachment C; and, a financial statement for the parent of the family of companies to which DNG belongs is appended hereto as Attachment D. **NON-PUBLIC ATTACHMENTS — CONTAINS TRADE SECRET DATA.** *DNG's and Greater Minnesota Synergy, Inc.'s (GMS) complete, audited financial statements for 2020 are included in the documents appended hereto prepared by Boeckermann Grafstrom Mayer, Certified Public Accountants, entitled "Dakota Natural Gas, LLC Financial Statements For the Years Ended December 31, 2020 and 2019", appended in Attachment C, and "Greater Minnesota Synergy, Inc. and Subsidiaries Consolidated Financial Statements For the Years Ended December 31, 2020 and 2019", appended in Attachment D. DNG respectfully requests that the content of the appended financial statements and notes be treated as protected data because the information was supplied by DNG; DNG and the entire GMS family of companies are privately held and their financial information is not publicly available; DNG and the entire family of GMS companies have taken reasonable efforts to maintain its secrecy by redacting it from public view and protecting private financial from non-organization*

individuals; and, DNG and the GMS family of companies derive independent economic value from its private financial information not being known by competitors, suppliers, and/or other members of the public who could obtain economic value from its use and whose use of the information could deleteriously impact DNG and the GMS family of companies.

D. Service to be Offered

DNG seeks authorization to construct, operate, and maintain a natural gas distribution system for the purpose of providing the benefits of natural gas to parts of the currently unserved area of Portland, North Dakota and its environs. DNG intends to operate pursuant to its existing tariff, including rates and service provisions; and, DNG contemporaneously submitted a proposed tariff modification to add the City of Portland service areas. DNG will not provide any distribution services until the requisite approvals have been received from the Commission.

E. Area to be Served

A map of the proposed distribution system extension is appended hereto as Attachment A. DNG anticipates serving the Portland community and its environs along the line. DNG anticipates that approximately 123 residential, commercial, and industrial customers will take service within the first three years of the line's operation.

F. Other Public Utilities Providing Similar Service in the Area

Portland, North Dakota area is not currently served by any other natural gas provider. No other natural gas public utility will be affected by the construction and operation of the proposed natural gas distribution system.

G. Franchise Authority

The City of Portland has awarded a natural gas franchise to DNG to provide gas to customers within the City.

DISCUSSION AND ANALYSIS

A utility must obtain a certificate of public convenience and necessity from the Commission prior to beginning construction or operation of a natural gas distribution system. N.D.C.C. § 49-03.1-01. Upon an application for such a certificate, the Commission considers the need for service; the fitness and ability of the applicant to provide service; the effect on other public utilities providing service; the adequacy of the proposed service; and, the technical, financial, and managerial ability of the applicant to provide service. N.D.C.C. § 49-03.1-04.

In the instant case, the need for service is indisputable. While many people living in urban areas or communities close to natural gas pipelines take the availability of natural gas service for

granted, those communities that are unserved lack access to an essential service to their detriment. Currently, residents and business in the Portland area are unable to avail themselves of the benefits of natural gas service and are forced to rely on alternate heating sources such as propane, coal, electricity, and wood. Portland has agricultural operations, businesses, and local residents that will benefit from access to safe, reliable, and affordable natural gas. Bringing natural gas to the area will enhance the ability of Portland and its environs to compete in a new and changing economy, just as Portland's immediate neighbor, Mayville, can now do. The presence of natural gas is a benefit to attracting, creating, and maintaining commercial and industrial anchors, bringing a competitive advantage to the area. Lower energy costs for residents and commercial competitiveness will all serve to increase the area's prosperity. The issuance of a natural gas franchise for DNG by the City of Portland provides empirical evidence of community interest in and the need for natural gas service, thereby demonstrating that the public interest will be fostered by DNG's proposed project.

Since the Portland community is currently unserved by natural gas, DNG's proposed distribution system will not have any effect on other public utilities. Further, because DNG plans to provide new service to the Portland area and is willing to provide service to any interested party along the line pursuant to its service requirements and tariff, DNG's proposed service is adequate.

Although DNG is a relatively new company, it is part of a family of companies with a well-developed history and reputation for expanding gas to rural, unserved areas. DNG's initial projects in the Drayton, Hillsboro, and Mayville, North Dakota areas proceeded as expected. DNG has established service centers staffed by dedicated technicians in both Drayton and Hillsboro, North Dakota. The technicians operating out of the Hillsboro service center will provide emergency response for the Portland area, which will be augmented by DNG's Drayton staff. The family of companies to which DNG belongs has an excellent knowledge base that DNG will continue to leverage in order to provide the same exceptional operational and customer service that its Minnesota family of companies provides. With safety and operational excellence as the companies' top priorities, DNG is fit and able to provide responsive, exemplary service to the Portland area. Since it is led and operated by the same personnel as its Minnesota family of companies, DNG has the technical, financial, and managerial ability to provide service.

DNG has live telephone answering 24 hours per day, 7 days per week available to handle any customer issues. DNG does not use automated "phone tree" call management technology. Issues of an emergency nature will be dispatched to local technical personnel for immediate response. Issues of a non-emergency nature will be handled as expeditiously as possible with the goal of providing exceptional customer service. The GMS family of companies has a proven history of providing excellent customer service and technical and safety response service; and, the same standards are applied to DNG. The GMS family of companies are also members of the American Gas Association which has a larger mutual aid agreement with other natural gas companies that can be used to respond to larger emergencies.

DNG's live staff speaks with customers any time they call. In the event that a call is received during normal business hours, customer care representatives do everything they can to answer each customer's questions and address any concerns during the initial phone call. To the extent

that a customer care representative is not able to provide a response, the representative obtains all necessary information, researches and communicates with internal staff, and reaches out to the customer with the answer. In the event that a non-emergency customer call is received outside of normal business hours, answering staff will take a detailed message and a customer care representative will respond at the first available opportunity during business hours.

Any time an emergency call is received, a dedicated technician is dispatched to the scene. A complete dispatch message, including all emergency information, is sent to the technician being dispatched. The responding technician arrives on scene as quickly as possible and works through an industry-prescribed series of steps to identify and address the emergency situation. Additionally, when the emergency call is received, DNG's customer care personnel provide the caller with safety instructions and use a series of scripted emergency response questions and answers to ensure that complete information is both obtained and shared.

REQEUST FOR COMMISSION ACTION

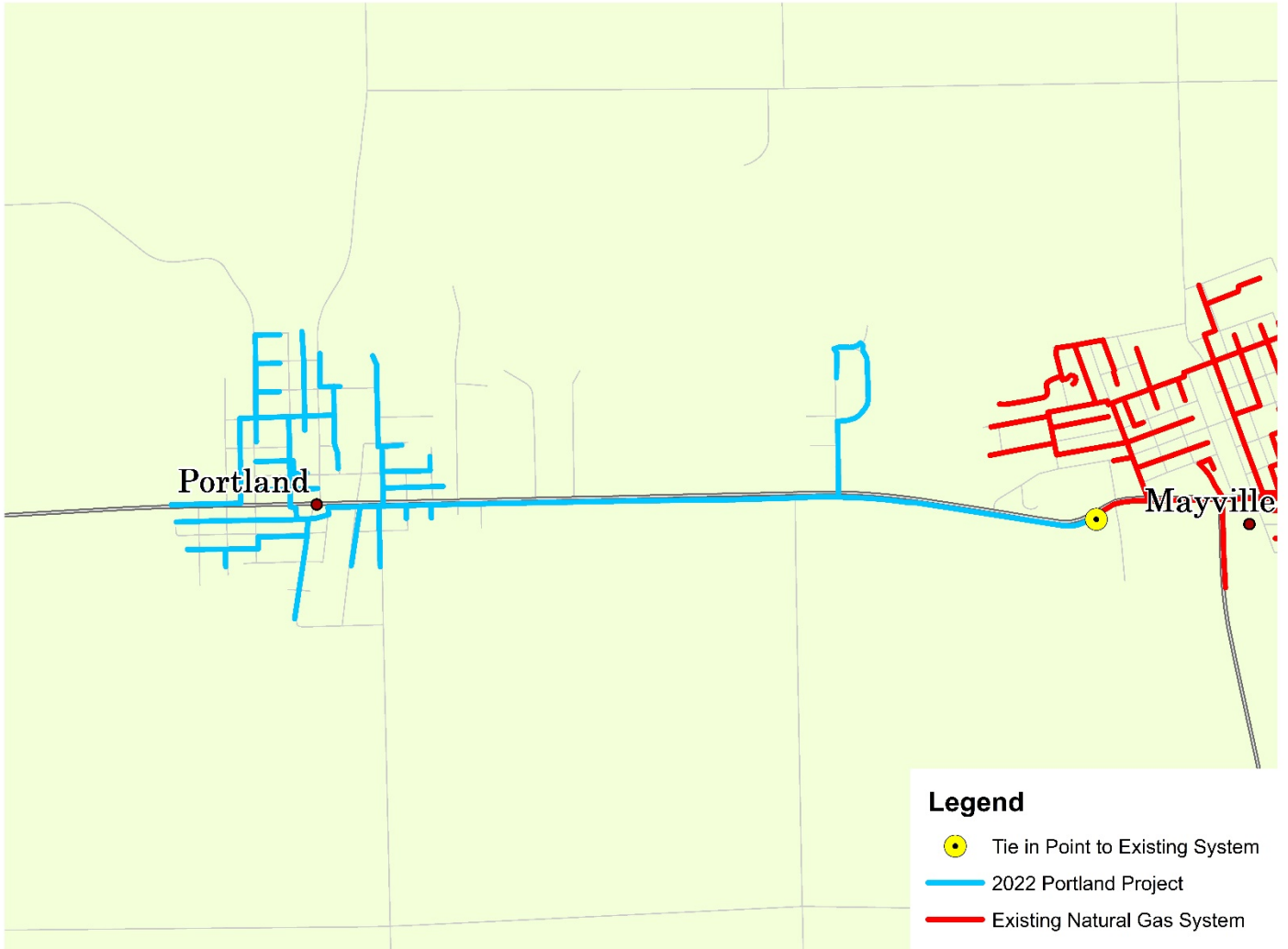
DNG is confident that the proposed project serves the public interest and is soundly planned. The proposed distribution system will deliver immeasurable benefits to the Trail County area that would not otherwise be available to it. Therefore, DNG respectfully requests that the Commission give notice of an opportunity to request a hearing to interested parties and, if no hearing is requested within twenty days, that it waive the hearing in accordance with N.D.C.C. § 49-03.1-05; and, that it enter an Order approving DNG's Application and issue a Certificate of Public Convenience and Necessity at its earliest available opportunity authorizing DNG to construct and operate natural gas distribution facilities necessary to serve the Portland, North Dakota area and its environs.

Dated: November 4, 2021

Respectfully submitted,

Kristine A. Anderson
Corporate Attorney (Minnesota) and Regulatory Affairs
Dakota Natural Gas, LLC
1900 Cardinal Lane
P.O. Box 798
Faribault, MN 55021
(888) 933-9743
Direct: 507-209-2110

ATTACHMENT A
Map



State of North Dakota

SECRETARY OF STATE



CERTIFICATE OF ORGANIZATION OF

DAKOTA NATURAL GAS, LLC
Secretary of State ID#: 45,372,300

The undersigned, as Secretary of State of the State of North Dakota, hereby certifies that Articles of Organization for

DAKOTA NATURAL GAS, LLC
duly signed and executed pursuant to the provisions governing a North Dakota LIMITED LIABILITY COMPANY, have been received in this office and are found to conform to law.

ACCORDINGLY the undersigned, as such Secretary of State, and by virtue of the authority vested in him by law, hereby issues this Certificate of Organization to

DAKOTA NATURAL GAS, LLC

Effective date of organization: June 25, 2018

Issued: June 25, 2018

A handwritten signature in cursive script, reading "Alvin A. Jaeger".

Alvin A. Jaeger
Secretary of State

45,372,30
1653002

**ARTICLES OF ORGANIZATION OF
DAKOTA NATURAL GAS, LLC**

Pursuant to North Dakota Century Code, Chapter 10-32.1, the Uniform Limited Liability Company Act (the "Act"), the undersigned organizer, being a natural person 18 years of age or older, hereby adopts the following Articles of Organization:

**ARTICLE I
Name and Principal Office**

The name of this Limited Liability Company is Dakota Natural Gas, LLC. The principal executive office of the Company is 202 South Main Street, P.O. Box 68, Le Sueur, Minnesota 56058.

45 6/25/18

**ARTICLE II
Registered Office**

The Company's commercial registered agent in North Dakota is MMRA LLC, ~~120 West Sweet Avenue, Suite 9, Bismarck, North Dakota 58504.~~

**ARTICLE III
Effective Date**

The Company shall be effective at the time that the Company's Certificate of Organization is issued by the Secretary of State.

**ARTICLE IV
Duration**

Unless dissolved earlier according to law, the existence of the Company shall be perpetual.

**ARTICLE V
Purpose**

The Company shall exist for any general lawful business purpose.


**ARTICLE VI
Organizer**

The name and address of the organizer of the Company is Kristine Anderson, 202 South Main Street, P.O. Box 68, Le Sueur, Minnesota 56058.

I, the above-named organizer, have read the foregoing Articles of Organization, know the contents thereof, and believe the statements made therein to be true. I further authorize the Secretary of State to correct Article 2 if not correctly reflected. I understand that if I make a false statement in this document, I may be subject to criminal penalties.

11/1/18 30, 2018
Date

Kristine Anderson
Kristine A. Anderson
202 South Main Street
P.O. Box 68
Le Sueur, MN 56068
(507) 665-8657
kanderson@greatermngas.com

NORTH DAKOTA
Filed 6/25 2018
Alvin D. ...
Secretary of State


State of North Dakota SECRETARY OF STATE



Certificate of Good Standing of DAKOTA NATURAL GAS, LLC

SOS Control ID#: 0000170040

Certificate #: 020802520

The undersigned, as Secretary of State of the state of North Dakota, hereby certifies that, according to the records of this office,

DAKOTA NATURAL GAS, LLC

a Limited Liability Company - Business - Domestic was formed under the laws of NORTH DAKOTA and filed with this office effective June 25, 2018. This entity has, as of the date set forth below, complied with all applicable North Dakota laws.

ACCORDINGLY, the undersigned, as such Secretary of State, and by virtue of the authority vested in him by law, hereby issues this Certificate of Good Standing.

DATE: October 19, 2021

A handwritten signature in black ink, appearing to read "Alvin A. Jaeger".

Alvin A. Jaeger
Secretary of State

**Entire Attachment is Submitted
Under Trade Secret Protection**

Dakota Natural Gas, LLC
FINANCIAL STATEMENTS
For the Years Ended
December 31, 2020 and 2019

**Entire Attachment is Submitted
Under Trade Secret Protection**

**Greater Minnesota Synergy, Inc.
and Subsidiaries**

CONSOLIDATED FINANCIAL STATEMENTS

**For the Years Ended
December 31, 2020 and 2019**