



**Douglas J. Law**  
Associate General Counsel  
Douglas.Law@blackhillscorp.com

1731 Windhoek Drive  
Lincoln, NE 68512  
P: 402.221.2635

January 31, 2025

Ret. Colonel Thomas Golden  
Executive Director  
Nebraska Public Service Commission  
1200 N Street, Suite 300  
Lincoln, NE 68508

Re: *Black Hills Nebraska Gas, LLC d/b/a Black Hills Energy*  
*Petition to Eliminate Semi-Annual Filing*  
*Voluntary Renewable Natural Gas Program Commission Docket No. NG-117*

Dear Ret. Col. Golden:

Enclosed for filing is a Motion to Eliminate Semi-Annual Filing for Voluntary Renewable Natural Gas and Carbon Offset Program (Green Forward Program).

Respectfully submitted,

*/s/ Douglas J. Law*

Douglas J. Law, Bar #19436  
Associate General Counsel

DL:ce

cc: [psc.naturalgas@nebraska.gov](mailto:psc.naturalgas@nebraska.gov)  
Chris Dibbern  
Brooke Bassell-Herman  
Jonathan Smith

**BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION**

IN THE MATTER OF THE PETITION OF BLACK HILLS NEBRASKA GAS, LLC d/b/a BLACK HILLS ENERGY FOR ELIMINATION OF SEMI-ANNUAL FILING IN VOLUNTARY RENEWABLE NATURAL GAS AND CARBON OFFSET PROGRAM )  
Docket No. NG-117

**MOTION FOR ELIMINATION OF SEMI-ANNUAL FILING**

Black Hills Nebraska Gas, LLC, d/b/a Black Hills Energy (“Black Hills Energy” or the “Company”), by its undersigned attorney, and pursuant to applicable Nebraska statutes and Commission rules and regulations, submits this Motion to amend filing requirements within Voluntary Renewable Natural Gas and Carbon Offset Program (“Green Forward Program”), as approved by the Commission on December 13, 2022, Docket No. NG-117 (“Green Forward Order”).

In support of this Motion, the Company states as follows:

1. The Commission approved Black Hills Energy’s application for the Green Forward Program in the above-captioned proceeding on December 13, 2022. The Green Forward Program is a four-year pilot program with an effective date of January 1, 2023, through December 31, 2026.
2. The Commission’s Green Forward Order also required Semi-Annual reports as recommended in the Public Advocate Report. The Green Forward Program was a new program, and the Commission ordered reports to be filed twice annually. The Commission further ordered Black Hills Energy’s Green Forward reports to include, among other items, (a) the status of the Green Forward Program, (b) customer participation, (c) Green Forward Program expenses, and

(d) Green Forward Program investments. The Commission understands that the Green Forward occurs annually Program may not provide positive revenues for several years.

3. Black Hills Energy complied with the order and submitted a semi-annual report since the program's inception. Based on this collective experience of the Parties to the Green Forward Program proceeding, and like the annual filing requirement in other states in which the Green Forward Program has been approved, Black Hills Energy now proposes that the Commission revise its prior action and require only one annual report. The data needed to calculate emissions addressed is dependent upon the verification and retirement of environmental attributes on behalf of the participants, which only occurs annually and must be completed by June per our supply agreement. To that end, Black Hills Energy proposes that the Commission require an annual report for the Green Forward Program on or before July 31<sup>st</sup> of each year during the remaining years of the Green Forward Program.

4. Black Hills Energy is willing and commits to providing an informational status report for its Green Forward Program at its January Commission Application No. NG-101 meeting. However, the content of that report would only include basic updates of the Green Forward Program. For example, that informal status report would provide the current number of customers, number of units enrolled and other basic Green Forward Program facts.

5. The Annual Green Forward Program report would contain the information included in Green Forward Program reports filed by Black Hills Energy.

6. Based on the reasoning above, Black Hills Energy requests the Commission to formally modify its current semi-annual Green Forward Program reporting requirement by eliminating the requirement of filing reports twice each year. Black Hills Energy respectfully moves that the Commission only require an annual filing to be submitted by July 31<sup>st</sup> of each year.

WHEREFORE, the Company requests that the Nebraska Public Service Commission approve elimination of semi-annual filing and allow the Company to submit an annual Green Forward Program report by July 31<sup>st</sup> of each year.

**Date: January 31, 2025**

Respectfully submitted,

*/s/ Douglas J. Law*

**Douglas J. Law, NE Bar #19436**

Associate General Counsel

Black Hills Energy

1731 Windhoek Drive

Lincoln, NE 68512

[douglas.law@blackhillscorp.com](mailto:douglas.law@blackhillscorp.com)

Counsel for Black Hills Nebraska Gas, LLC  
d/b/a Black Hills Energy

## Certificate of Service

The undersigned hereby certifies that a copy of the foregoing was served by e-mail on the 31<sup>st</sup> day of January, 2025, upon the following individuals:

Nichole Mulcahy <a href="mailto:Nichole.mulcahy@nebraska.gov">Nichole.mulcahy@nebraska.gov</a>	Deena Ackerman <a href="mailto:Deena.ackerman@nebraska.gov">Deena.ackerman@nebraska.gov</a> E-filing: <a href="mailto:psc.naturalgas@nebraska.gov">psc.naturalgas@nebraska.gov</a>
Chris Dibbern <a href="mailto:Dibbernlaw@gmail.com">Dibbernlaw@gmail.com</a>	Donna Mullinax <a href="mailto:dmullinax@bluerigdecs.com">dmullinax@bluerigdecs.com</a>
Jonathan Smith <a href="mailto:Jonathan.smith@gmail.com">Jonathan.smith@gmail.com</a>	

### Respondent

By: */s/ Douglas J. Law*

Douglas J. Law, #19436  
Black Hills Energy  
Associate General Counsel  
1731 Windhoek Drive  
Lincoln, NE 68512  
Tel: (402) 221-2635  
[douglas.law@blackhillscorp.com](mailto:douglas.law@blackhillscorp.com)

**Attorney for Black Hills Nebraska Gas, LLC  
d/b/a Black Hills Energy**