

**BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION**

IN THE MATTER OF THE APPLICATION OF )  
BLACK HILLS NEBRASKA GAS, LLC d/b/a )  
BLACK HILLS ENERGY FOR ELIMINATION OF )  
THE SEMI-ANNUAL FILING IN VOLUNTARY )  
RENEWABLE NATURAL GAS AND CARBON )  
OFFSET PROGRAMS )  
)

Application No. NG-117

**COMMENTS OF THE PUBLIC ADVOCATE**

Comes now the Nebraska Public Advocate, Chris Dibbern. The Public Advocate, pursuant to Neb. Rev. Stat. §66-1831 (reissue 2018), is authorized to intervene in any proceedings before the Commission concerning the legality and reasonable of rates, charges, and practices of jurisdictional utilities and has reviewed the Docket No. NG-117 regarding the Voluntary Renewable Natural Gas and Carbon Offset program. The Public Advocate approves of the flexibility of this program and a path forward for a cleaner energy future.

In the August 12, 2022, filing as part of the Program, Black Hills sought approval of deferred accounting treatment of record and defer the revenues and the expenses associated with the Program to ensure that only program participants pay for the costs of the Program and to ensure Black Hills Fully recovers the costs of the Program from only those customers who participate. The participants are voluntary participants of the program. The program became available in January 2023, and is a multi year pilot program running through 2026. The Public Advocate also would suggest the company report the number of non jurisdictional accounts, commercial and industrial, in Nebraska signed up for the program, if offered to them.

The Public Advocate agrees that the Company should be allowed to file an annual report for the Green Forward Program on or before July 31 of each year during the remaining years of the Program, in lieu of twice a year as the original order required. The Annual report shall include customer participation, a full financial summary, and the program status updates on compliance and marketing.

The Company also offered to give a briefing every six months (semi-annual) as an update of the Nebraska Public Service Commission quarterly status NG-101 meeting and answer questions regarding the program. By piloting this program a study should be conducted of the customers interest and actual enrollment and issue findings and conclusions at the end of the study.

DATED this 6th day of February 2025.

PUBLIC ADVOCATE

By: Chris Dibbern  
Chris Dibbern, #17286

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing Public Advocate's Questions was served electronically on this 6th day of February 2025, upon the following:

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*Chris Dibbern*

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