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April 28, 2021

Mr. Mike Hybl
Executive Director
Nebraska Public Service Commission
1200 N Street, Suite 300
Lincoln, NE 68508

Re: Application No. NG-109
Response to the Public Advocate Review of Interim Refund Plan
Black Hills Nebraska Gas, LLC d/b/a Black Hills Energy

Dear Mr. Hybl;

Black Hills Nebraska Gas, LLC d/b/a Black Hills Energy (“BH Nebraska Gas”) has reviewed the Public Advocate’s pleading reviewing the BH Nebraska Gas Interim Rate Refund Plan and submits the attached Response.

If there are any questions or concerns with either the form or content of this response, please let me know.

Respectfully submitted,

/s/ Douglas J. Law, #19436

Douglas J. Law
Associate General Counsel

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF NEBRASKA**

**IN THE MATTER OF THE APPLICATION)
OF BLACK HILLS NEBRASKA GAS, LLC,)
D/B/A BLACK HILLS ENERGY, RAPID)
CITY, SOUTH DAKOTA, SEEKING) **Commission Application No. NG-109**
APPROVAL OF A GENERAL RATE)
INCREASE)**

**RESPONSE OF BLACK HILLS NEBRASKA GAS, LLC
D/B/A BLACK HILLS ENERGY TO
THE REVIEW OF THE INTERIM RATE REFUND PLAN BY
THE NEBRASKA PUBLIC ADVOCATE**

COMES NOW, Black Hills Nebraska Gas, LLC d/b/a Black Hills Energy, ("BH Nebraska Gas" or the "Company") hereby files this Response to the Public Advocate's filing reviewing the BH Nebraska Gas Interim Rate Refund Plan. BH Nebraska Gas appreciates the thorough investigation, review, and analysis conducted by the Public Advocate.

BH Nebraska Gas's Response

BH Nebraska Gas has no response other than the following confirmation and clarification to the Public Advocate's recommendations found on Page 7 of the Public Advocate's filing:

- 1) BH Nebraska Gas agrees that undistributed refunds for customers who cannot be located will be held for 12 months and credited to **all** GCA customers and not to just residential GCA customers; and
- 2) **Customer Notice Clarification:** The Public Advocate's second recommendation on Page 7 of the report is to expand the customer notice regarding the refund. Specifically, the Public Advocate recommends that the notice to state as follows:

"The second modification is that the Communication notice to be included with customer bills should be modified to be more specific. Blue Ridge suggests this revised language: "As part of the regulatory rate review approved by the Nebraska Public Service Commission on January 26, each customer will receive an individual, one-time rate refund credited to their June 2021 bill. The

refund represents the difference between the final rates and the interim rates in place during the period from September 1, 2020, through February 28, 2021. For more details, visit blackhillsenergy.com/reliableNE.”

Unfortunately, the BH Nebraska Gas billing information system will not accommodate that many characters for the customer notice. Accordingly, BH Nebraska Gas states that the following notice will be provided instead:

“The Nebraska Public Service Commission approved a one-time rate refund for the difference between current service rates and interim rates in place during the period from September 1, 2020 through February 28, 2021. For more details, visit blackhillsenergy.com/reliableNE.”

BH Nebraska Gas’s understanding is that the shorter version of the customer notice is acceptable to the Public Advocate. A copy of the BH Nebraska Gas internal bill message request form is attached as Exhibit “A”.

Given the Public Advocate’s review of the Interim Rate Refund Plan, BH Nebraska Gas does not believe that any further evidentiary hearing or workshop is needed regarding the Interim Rate Refund Plan.

Dated this 28th day of April, 2021.

Respectfully submitted,

BLACK HILLS NEBRASKA GAS, LLC
D/B/A BLACK HILLS ENERGY

[/s/ Douglas J. Law](#)

Douglas J. Law #19436

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ATTORNEY FOR BH NEBRASKA GAS
D/B/A BLACK HILLS ENERGY

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of April 2021 the foregoing RESPONSE OF BLACK HILLS NEBRASKA GAS, LLC D/B/A BLACK HILLS ENERGY TO THE REVIEW OF THE INTERIM REFUND PLAN BY THE PUBLIC ADVOCATE was served electronically on the following at the email address shown below:

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Christina Ellis
Christina Ellis



Bill Communication Request Form

Please complete the following fields

Requested form of communication		Bill Message
Description		Rate Change
Type		Customer Information
Project number:		Insert Weight:
When the communication should run Assume communication will be ran starting with billing cycle 1 through 20 for the month indicated.	Specify Month(s) June 2021 Specify if Other Than Bill Cycles 1 – 20 (Used by Soft Tables) Start Date (Used by Soft Tables) End Date	
Customers to receive (Mark all that apply)	<input type="checkbox"/> ALL CUSTOMERS <input type="checkbox"/> Residential - Include Appliance Repair <input type="checkbox"/> Residential - Appliance Repair Only <input type="checkbox"/> Residential - Exclude Appliance Repair <input type="checkbox"/> Commercial	<input type="checkbox"/> Industrial <input type="checkbox"/> Specific Rate (Add Comments) <input type="checkbox"/> Specific Area (Add Comments) <input type="checkbox"/> Specific City (Add Comments) <input checked="" type="checkbox"/> Other (Add Comments)
*Additional comments (Must complete if Specific Rate, Specific Area, Specific City or Other is selected): exclude non-jursidictional		
Division to receive		
<input type="checkbox"/> All Black Hills Energy <input type="checkbox"/> Colorado Electric (WC) <input type="checkbox"/> Colorado Gas (PC) <input type="checkbox"/> Iowa Gas (PI) <input type="checkbox"/> Kansas Gas (PK) <input checked="" type="checkbox"/> Nebraska Gas (NE) <input type="checkbox"/> NW Wyoming Gas (CC)	<input type="checkbox"/> Arkansas Gas (GA) <input type="checkbox"/> Colorado Gas Distribution (GC) <input checked="" type="checkbox"/> Nebraska Gas Distribution (GN) <input type="checkbox"/> Wyoming Gas Distribution (GW) <input type="checkbox"/> Wyoming Electric & Gas Cheyenne <input type="checkbox"/> Wyoming Electric Cheyenne (CL) <input type="checkbox"/> Wyoming Gas Cheyenne (CG) <input type="checkbox"/> Wyoming Gas Cheyenne (CG)	<input type="checkbox"/> All Legacy BHP <input type="checkbox"/> South Dakota Electric (BP) <input type="checkbox"/> Montana Electric (BT) <input type="checkbox"/> Wyoming Electric BHP (BW)
BILL MESSAGE - Please enter text of communication. (Note: Bill Message text limited to six lines with 50 characters per line including spaces, and hyphenation of words is not allowed.) The Nebraska Public Service Commission approved a one-time rate refund for the difference between current service rates and interim rates in place during the period from Sept. 1, 2020, through Feb. 28, 2021. For more details, visit blackhillsenergy.com/reliableNE .		