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February 29, 2024

Advice Letter No. 43

Public Utilities Commission of the State of Colorado Attn: Rebecca White, Director 1560 Broadway, Suite 250 Denver, CO 80202

The accompanying tariff sheets issued by Black Hills Colorado Gas, Inc. d/b/a Black Hills Energy ("BHCG" or "Company") are sent to you for filing in compliance with the requirements of the Public Utilities Law and the applicable rules of the Public Utilities Commission of the State of Colorado ("Commission"), including Rules 4110, 4602(a), 4603, and 4604. The following tariff sheets are attached:

## COLORADO P.U.C. NO. 1

Colorado P.U.C Sheet Number	Title of Sheet	Cancels Colorado P.U.C. Sheet Number
21st Revised Sheet No. 13	Statement of Rates	20th Revised Sheet No. 13
	Rate Schedule Sheet	
	Gas Sales Rates	
24th Revised Sheet No. 14	Statement of Rates	23 <sup>rd</sup> Revised Sheet No. 14
	Rate Schedule Sheet	
	Gas Sales Rates	
23rd Revised Sheet No. 15	Statement of Rates	22nd Revised Sheet No. 15
	Rate Schedule Sheet	
	Gas Sales Rates	
21st Revised Sheet No. 16	Statement of Rates	20th Revised Sheet No. 16
	Rate Schedule Sheet	
	Gas Sales Rates	
23rd Revised Sheet No. 17	Statement of Rates	22nd Revised Sheet No. 17
	Rate Schedule Sheet	
	Gas Sales Rates	
23rd Revised Sheet No. 18	Statement of Rates	22nd Revised Sheet No. 18
	Rate Schedule Sheet	
	Gas Sales Rates	

Colorado P.U.C Sheet Number	Title of Sheet	Cancels Colorado P.U.C. Sheet Number
21st Revised Sheet No. 19	Statement of Rates Rate Schedule Sheet Gas Sales Rates	20th Revised Sheet No. 19
23rd Revised Sheet No. 20	Statement of Rates Rate Schedule Sheet Gas Sales Rates	22nd Revised Sheet No. 20
23rd Revised Sheet No. 21	Statement of Rates Rate Schedule Sheet Gas Sales Rates	22nd Revised Sheet No. 21
23rd Revised Sheet No. 22	Statement of Rates Rate Schedule Sheet Gas Sales Rates	22nd Revised Sheet No. 22
21st Revised Sheet No. 23	Statement of Rates Rate Schedule Sheet Gas Sales Rates	20th Revised Sheet No. 23
23rd Revised Sheet No. 24	Statement of Rates Rate Schedule Sheet Gas Sales Rates	22nd Revised Sheet No. 24
23rd Revised Sheet No. 25	Statement of Rates Rate Schedule Sheet Gas Sales Rates	22nd Revised Sheet No. 25
11th Revised Sheet No. 30	Statement of Rates Rate Schedule Sheet Gas Transportation Service Rates	10th Revised Sheet No. 30
10th Revised Sheet No. 65	Gas Rate Adjustments Gas Cost Adjustment ("GCA") (Continued)	9th Revised Sheet No. 65

The principal purpose of this filing is to modify the Company's Gas Cost Adjustment ("GCA") rates in order to recover deferred GCA costs and forecasted quarterly GCA costs effective April 1, 2024. The GCA rate will decrease for customers located in the Central GCA region, Western Slope GCA region, and Western Slope with Storage GCA region, while the GCA rate will increase for customers located in the North/Southwest GCA region. Additionally, the GT-1 Rate Adjustment applicable to the Central GCA region Distribution Transportation Service Rate Schedule will be modified to \$0.00100 per therm. Through this Advice Letter, BHCG requests authorization to reset the GCA rates to reflect the changes to the upstream demand and gas commodity costs and to adjust the deferred gas cost. Deferred costs through December 31, 2023, have been included in calculation of GCA rates.

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The tariff revisions, if they were to go into effect on April 1, 2024, would result in annualized GCA recoveries of \$119,551,481 compared to the annualized GCA recoveries of \$157,444,807 recovered through current GCA rates. The proposed resulting aggregate change to the GCA rates are:

GCA Region	Current GCA \$/Therm	Proposed GCA \$/Therm	Increase / (Decrease)
Central	\$0.44697	\$0.37179	(\$0.07518)
North/Southwest	\$0.56861	\$0.57328	\$0.00467
Western Slope (without storage)	\$1.00600	\$0.67497	(\$0.33103)
Western Slope (with storage)	\$1.08853	\$0.75435	(\$0.33418)

If approved, the proposed GCA would supersede BHCG's currently effective GCA, implemented in Proceeding No. 23AL-0588G. The change in revenue resulting from the proposed GCA is an overall annual decrease of (\$37,893,326) as compared to forecasted revenues with the current GCA rate in effect. In establishing the forecasted commodity and upstream GCA rate component, the Company has included three months of forecasted gas costs and usage from April 2024 to June 2024. In establishing the deferred cost GCA component, the deferred gas costs have been amortized over a 12-month period. As demonstrated in the table below, the \$43 million annual total gas cost decrease, which is attributable to a decrease in current gas cost forecasts compared to those used for the currently effective GCA, is partially offset by a \$5.2 million increase in deferred gas costs compared to those used in the previous GCA filing, resulting in a (\$37,893,326) decrease in annualized revenues.

GCA Region	Increase / Decrease	Change in Revenue
Central	Decrease	(\$7,669,650)
North/Southwest	Decrease	(\$3,042)
Western Slope (Without Storage)	Decrease	(\$20,394,748)
Western Slope (With Storage)	Decrease	(\$9,825,886)
<b>Total Revenue Impact</b>	Decrease	(\$37,893,326)
Total Gas Costs	Decrease	(\$43,057,105)
Total Deferred Gas Costs	Increase	\$5,163,779
<b>Total Revenue Impact</b>	Decrease	(\$37,893,326)

## **FACTORS FOR CHANGED RATES**

The decreases are almost entirely driven by a decrease in forecasted commodity prices (~\$4/Dth in the previous filing to ~\$2/Dth in the current filing). While the commodity costs in the N/SW GCA region also decreased, this was offset by the upstream costs remaining relatively flat while Dth significantly decreased.

The deferred activity by GCA Region found at GCA Confidential Attachment No. 3 is as follows:

GCA Region	Beginning Deferred Balance – September 30, 2023	Total Deferred Gas Cost – October 1, 2023 – December 31, 2023	Ending Deferred Balance – Period Ending December 31, 2023
Central	(\$6,606,785)	\$1,311,378	(\$5,295,407)
North/Southwest	(\$2,054,055)	\$664,542	(\$1,389,513)
Western Slope (without storage)	\$11,355,755	\$2,748,111	\$14,103,866
Western Slope (with storage)	(\$294,253)	\$440,104	\$145,851

The resulting Deferred Gas Cost Rates per Dth as detailed on GCA Attachment No. 1 are as follows:

GCA Rate Area	Current Total Surcharge Rate per Dth	Proposed Total Surcharge Rate per Dth	Change in Surcharge Rate per Dth
Central	(\$0.6426)	(\$0.5143)	\$0.1283
North/Southwest	(\$0.6414)	(\$0.4376)	\$0.2038
Western Slope (without storage)	\$1.2571	\$1.5669	\$0.3098
Western Slope (with storage)	\$1.1562	\$1.6171	\$0.4609

The resulting total forecasted gas costs per Dth as detailed on GCA Attachment No. 1 are as follows:

GCA Rate Area	Current Total Gas Cost – per Dth	Proposed Total Gas Cost – per Dth	Change in Total Gas Cost – per Dth
Central	\$5.1123	\$4.2322	(\$0.8801)
North/Southwest	\$6.3275	\$6.1704	(\$0.1571)
Western Slope (without storage)	\$8.8029	\$5.1828	(\$3.6201)
Western Slope (with storage)	\$9.7291	\$5.9264	(\$3.8027)

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BHCG proposes to pass on the proposed GCA rate changes effective with volumes taken on and after April 1, 2024.

In support of this advice letter, the Company submits and incorporates the following attachments:

- a. <u>GCA Attachment No. 1 GCA Summary</u>. This attachment contains the summary of the GCA, including illustrations of impacts on present and proposed revenues and customers and the percentage change in the total bill for the average customer.
- b. <u>Confidential GCA Attachment No. 2 Current Gas Cost Calculation</u>. This attachment contains the Current Gas Cost Calculation and provides month-by-month information with respect to Forecasted Gas Commodity Costs, Forecasted Gas Purchase Quantities, Forecasted Market Prices, Forecasted Upstream Service Cost and Forecasted Sales Gas Quantity.
- c. <u>Confidential GCA Attachment No. 3 Deferred Gas Cost Calculation</u>. This attachment contains the Deferred Gas Cost Calculation and provides month-by-month information detailing the activity in Account No. 191, Interest on Under- or Over-Recovery for the period ending December 31, 2023.
- d. GCA Attachment No. 4 Current Tariffs. This attachment provides the current Tariff Sheet Nos. 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 30, and 65 which show the GCA components and the GT-1 Rate Adjustment currently in effect.
- e. <u>Confidential GCA Attachment No. 5 Forecasted Gas Transportation Demand.</u> This attachment presents the current calculation of the rate applicable to the Central GCA Region Distribution Transportation Service Rate Schedule (Rate Schedule GT-1) for natural gas service, in an amount per therm sufficient to provide recovery of certain upstream capacity costs. The calculation includes a forecast of Transportation demand for the Central GCA Region for the months April 2024 through June 2024. This GCA Attachment No. 5 is not applicable to the North/Southwest and Western Slope GCA Regions.
- f. GCA Attachment No. 6 Current Gas Cost Allocations. BHCG provides gas service in multiple geographically distinct service areas. As the gas distributed in each service territory is sourced from different supply areas, and delivered through different pipeline transmission and storage facilities, BHCG separately accounts for, and calculates a separate Gas Cost Adjustment to recover the upstream gas supply costs and delivery costs incurred to provide service in each of the service territories. In accordance with its currently effective and approved tariff, BHCG calculates its projected and actual commodity costs within each service area on an area-wide basis, resulting in an equal Gas Cost Adjustment assessed on all volumes delivered to sales service customers within each service area, regardless of service classification. Therefore, the requirement for this attachment is not applicable to BHCG in accordance with Rule 4604(g) of the Commission's Gas Rules.

- g. <u>GCA Attachment No. 7 Notice of Rate Change</u>. This attachment provides a copy of BHCG's customer notice regarding the rate change.
- h. <u>GCA Attachment No. 8 Components of Delivered Gas Cost.</u> This attachment lists the Components of Delivered Gas Costs by rate class.
- i. GCA Attachment No. 9 Proposed Tariffs. This attachment contains the proposed Tariff Sheet Nos. 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 30, and 65 which reflect the proposed changes to the rates and tariffs.
- j. <u>Attachment No. 10 Storm Uri Deferred Balances</u>. This attachment provides the Account 191 Balances for Storm Uri by Region and was previously included in the Company's quarterly Account 191 balance filing in Proceeding No. 98M-346G.
- k. <u>Attachment No. 11 Rate Trend Report</u>. This attachment includes the rate trend history by residential customer classes, inclusive of proposed changes to the GCA rates in the instant filing.

This filing will be noticed pursuant to the requirements of the Colorado Public Utilities Law. Concurrently with this filing, the Company is filing a Motion for Alternative Form of Notice referencing the customer notice provided in Attachment 7 – Notice of Rate Change. The Motion requests Commission approval for four methods of providing the Customer Notice to all customers. First, the Company will file with the Commission and keep open for public inspection the new schedules. Second, the Customer Notice will be published in *The Denver Post*. Third, the Company will post the Customer Notice, this advice letter and accompanying tariff sheets on the Company's website. Fourth, a bill message will notify applicable customers of the website posting and provide both the URL link and a toll-free phone number for assistance. The bill message will run for one full cycle.

Please send copies of all notices, pleadings, correspondence, and other documents regarding this filing to the undersigned.

Sincerely,

**BLACK HILLS ENERGY** 

/s/ Matthew J. Christofferson

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