

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

PROCEEDING NO. 21AL - _____G

IN THE MATTER OF ADVICE LETTER NO. 8 OF BLACK HILLS COLORADO GAS, INC. D/B/A BLACK HILLS ENERGY FOR APPROVAL OF ITS ANNUAL DEMAND SIDE MANAGEMENT COST ADJUSTMENT TO TAKE EFFECT ON JULY 1, 2021.

MOTION FOR ALTERNATIVE FORM OF NOTICE

Pursuant to C.R.S. § 40-3-104(1)(c)(I)(E) and Rule 1207(b), Black Hills Colorado Gas, Inc. (“BHCG” or the “Company”), by its undersigned attorney, respectfully requests that the Colorado Public Utilities Commission (“Commission”) enter an Order approving an alternative form of notice that will apply to the tariff changes in the Demand Side Management Cost Adjustment (“DSMCA”) that BHCG seeks to implement pursuant to Advice Letter No. 8 including approval of its annual Demand Side Management Cost Adjustment to take effect on July 1, 2021. BHCG also asserts that conferral is not required for this Motion according to Commission Rule 1400(a)(I), and that responses to this Motion are not allowed according to Commission Rule 1207(b). In support of the relief requested, BHCG states as follows:

1. On May 27, 2021, the Company filed Advice Letter No. 8 to amend its DSMCA calculation inputs and tariff language on Tariff Sheet Nos. 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, and 53 of its Colorado P.U.C. No. 1 Tariff. The proposed tariff amendments will increase the DSMCA rate beginning July 1, 2021.

2. By this Motion, BHCG seeks Commission approval to provide alternative notice of its Advice Letter No. 8.

3. Specifically, BHCG seeks Commission authorization to use the following forms of alternative notice:

- a. Filing with the Commission and keeping open for public inspection new schedules stating plainly the changes to be made in the schedules then in force and the time when the changes will go into effect in Advice Letter No. 8;
- b. Posting on BHCG's website: (1) a Customer Notice attached to Advice Letter No. 8 as Appendix 11 ("Customer Notice") and (2) Advice Letter No. 8 and its accompanying schedules, for sixty (60) days beginning within one week after the filing of Advice Letter No. 8;
- c. Printing a message on each applicable customer's bill providing the website URL for the Customer Notice and Advice Letter No. 8 and its accompanying schedules, as well as a toll-free phone number for assistance, beginning within one week after the filing of Advice Letter No. 8. The bill message reads:

We have filed to modify DSMCA rates effective July 1. If approved, the average monthly bill will increase \$0.08-\$10.46, or 0.10%-2.09%, depending on the base rate area, GCA region, and customer class. For more information, call 888-890-5554 or visit www.blackhillsenergy.com/filings.

- d. Publishing the Customer Notice, with size dimensions of four columns width and 11 inches height, in *The Denver Post*, a newspaper of general circulation for the service territory. Due to the expense, and the other methods of conveying notice to customers as set forth herein, the Customer Notice will be published on one occasion, within ten (10) days of the date of this Motion.

4. In order to properly inform customers regarding the rate change, the Company would like to use the forms of noticing described above. The Company believes that through noticing customers via bill messages, legal notice publication, and the required website posting, the Company will be able to reach all customers in the service territory in an affordable and efficient manner. In the event the Commission denies this Motion, and determines that additional

notice is required, the Company will provide additional notice consistent with the Commission's order.

5. The Company plans to go forward with this alternative form of notice. The Company would like to avoid incurring "time and materials" expense for printing customer bill inserts, where such expense includes both Company employees and third-party vendors. In the event the Commission denies this Motion, and determines that additional notice is required, the Company will provide additional notice consistent with the Commission's order.

6. There is good cause for the alternative form of notice requested by this Motion. A bill message, unlike a bill insert, provides more visibility to the customer because it is presented on the first page of the bill, where the customer looks for the dollar amount due and the payment deadline. The website posting will provide the required information regarding the amended tariff to the general public. The toll-free phone number provided in the bill message will give customers a second option to learn more about the amended tariff if they cannot access the internet for the Company's website. The newspaper publication will provide accessible and timely notice across the Company's entire service territory. These alternative forms of notice are expeditious and economic for the Company's customers.

WHEREFORE, for the reasons set forth herein, BHCG respectfully requests an order from the Commission authorizing the alternative forms of notice, as more particularly defined herein and such additional relief as the Commission deems necessary.

Date: May 27, 2021

Respectfully submitted,

By: /s/ Emanuel T. Cocian
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CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of May 2021 the foregoing **MOTION FOR ALTERNATIVE FORM OF NOTICE** was E-filed and served through the Commission E-filings System.

/s/ Elaine Hegler