BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

PROCEEDING NO. 19AL - 0184G

IN THE MATTER OF ADVICE LETTER NO. 602 OF BLACK HILLS COLORADO GAS, INC. D/B/A BLACK HILLS ENERGY FOR APPROVAL OF ITS ANNUAL GAS DEMAND SIDE MANAGEMENT COST ADJUSTMENT TO TAKE EFFECT ON JULY 1, 2019.

MOTION FOR APPROVAL OF ALTERNATIVE FORM OF NOTICE

Pursuant to C.R.S. § 40-3-104(1)(c)(I)(D) and Rule 1207(b), Black Hills Colorado Gas, Inc. (successor in interest to Black Hills/Colorado Gas Utility Company, Inc. (“BHCOG”)) (“BH Colorado Gas” or the “Company”), by its undersigned attorney, requests that the Commission enter an Order approving an alternative form of notice that will apply to the tariff changes in the Gas Demand Side Management Cost Adjustment (“G-DSMCA”) that BH Colorado Gas seeks to implement pursuant to BHCOG Advice Letter No. 602 including approval of its annual Gas Demand Side Management Cost Adjustment to Take Effect on July 1, 2019. BH Colorado Gas 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, BHCOG states as follows:

1. On April 1, 2019, the Company filed Advice Letter No. 602 affecting applicable residential and non-residential customers pursuant to its tariffs on file with the Commission. BH Colorado Gas is requesting approval of BHCOG’s revised annual G-DSMCA to take effect on July 1, 2019 for a period of 3 months until new rates are implemented in the Company’s ongoing rate case proceeding, Proceeding No. 19AL-0075G.
2. By this Motion, BH Colorado Gas seeks Commission approval to provide alternative notice of its Advice Letter No. 602.

3. Specifically, BH Colorado Gas seeks Commission authorization to use the following form of alternative notice:

   a. Filing with the Commission, and keeping open for inspection, Advice Letter No. 602;

   b. Posting on the website for BHCOCG: (1) a Customer Notice attached hereto, which is also attached to Advice Letter No. 602 as Schedule 8 (“Customer Notice”) and (2) Advice Letter No. 602 and its accompanying schedules, for sixty (60) days beginning within one week after the filing of Advice Letter No. 602;

   c. Printing a message on each applicable customer’s bill providing the website URL for the Customer Notice and Advice Letter No. 602 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. 602. The bill message reads:

   We’ve filed to amend the DSMCA effective July 1. If approved, the average residential monthly bill will increase by $.85 or 1.61%. The average small commercial monthly bill will decrease by $4.70 or 5.46% if approved. For details, 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 twenty (20) days of the date of this Motion.
4. 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.

5. 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, BH Colorado Gas respectfully requests that the Commission approve the alternative form of notice set forth in this Motion that applies to the tariff changes in the G-DSMCA that BHC OG seeks to implement pursuant to Advice Letter No. 602.
Date: April 8, 2019

Respectfully submitted,

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

I hereby certify that on this 8th day of April 2019 the foregoing MOTION FOR APPROVAL OF ALTERNATIVE FORM OF NOTICE was E-filed and served through the Commission E-filings System.

/s/ Blair Wetzel