Pursuant to C.R.S. § 40-3-104(1)(c)(I)(D) and Rule 1207(b), Black Hills/Colorado Gas Utility Company, Inc., d/b/a Black Hills Energy (“BHCOG” or the “Company”), by its undersigned attorney, requests that the Commission enter an Order approving an alternative form of notice that will apply to Advice Letter No. 598. In support of the relief requested, BHCOG states as follows:

1. On December 28, 2018, the Company filed Advice Letter No. 598 to amend the tariffs for the Black Hills Energy Assistance Program (“BHEAP”), the Company’s low-income energy assistance program in its Colo. P.U.C. No. 3-Gas Tariff. The proposed tariff amendments serve three purposes: 1) update the BHEAP Funding Fees as discussed in Advice Letter No. 598; 2) update Federal Poverty Levels for the BHEAP Benefit Cycle commencing October 1, 2018; and 3) incorporate a housekeeping edit which does not affect the program.

2. By this Motion, BHCOG seeks Commission approval to provide more efficient and cost-effective alternative notice of its proposed tariff amendments.

3. Specifically, BHCOG seeks Commission authorization to use the following form of alternative notice:
a. Filing with the Commission, and keeping open for inspection, Advice Letter No. 598, which amends its low-income assistance program in its Colo. P.U.C. No. 3-Gas Tariff;

b. Posting on the website for Black Hills Energy Advice Letter No. 598 and all attachments, for sixty (60) days beginning within one week after the filing of Advice Letter No. 598;

c. Printing a message on each applicable customer’s bill which reads “We filed to increase rates under our low income program tariff effective February 1, 2019. For details, call 888-890-5554 or visit blackhillsenergy.com/filings.” The bill message will provide the website URL for the Customer Notice and Advice No. 598 and its accompanying attachments, and a toll-free phone number for assistance, beginning within one week after the filing of Advice Letter No. 598; and,

d. Publishing the customer notice one time in the Denver Post, a newspaper of general circulation for the service territory.

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 publications 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, BHCOG respectfully requests that the Commission approve the
alternative form of notice for the proposed tariff changes to its Colo. P.U.C. No. 3-Gas Tariff as
set forth in this Motion.

Date: December 28, 2018

Respectfully submitted,

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