



Northern Natural Gas Company
P.O. Box 3330
Omaha, NE 68103-0330
402 398-7200

April 29, 2022

Via eFiling

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: Northern Natural Gas Company
Northern Lights 2023 Expansion
Docket No. CP22-138-000
Supplemental Document – Customer Support Letter

Dear Ms. Bose:

Northern Natural Gas (Northern) submits for filing with the Federal Energy Regulatory Commission in the above-referenced docket the attached supplemental customer support letter from Midwest Natural Gas, Inc. Northern is filing on behalf of Midwest Natural Gas.

Any questions regarding this filing should be directed to the undersigned at (402) 398-7103.

Respectfully submitted,

/signed/ Michael T. Loeffler

Michael T. Loeffler, senior director, certificates

Cc: Parties of Record

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Northern Natural Gas, application for a certificate of public need and necessity, Northern Lights 2023 Project))))	Docket No. CP22-138-000
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**COMMENTS OF MIDWEST NATURAL GAS, INC.
IN SUPPORT OF APPLICATION OF NORTHERN NATURAL GAS
FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY**

Pursuant to Rule 214 of the Federal Energy Regulatory Commission’s (FERC or the Commission) Rules of Practice and Procedure, Midwest Natural Gas, Inc. (Midwest) respectfully provides the following comments in support of the application of Northern Natural Gas for a certificate of public convenience and necessity from the Commission for the proposed Northern Lights 2023 Project as submitted in the above-captioned docket.

I. BACKGROUND

On March 25, 2022, Northern Natural Gas (Northern) filed an application for public convenience and necessity for its Northern Lights 2023 Project. As explained in Northern’s application, Northern proposes to own, construct, and operate certain facilities, as described in its application. The facilities were designed to provide needed incremental capacity by November 1, 2023, to its customers in its Market Area.

Midwest supported and participated in the open season held by Northern in 2021 for the project. Accordingly, the Northern Lights 2023 Project is a market-driven project designed to meet incremental growth needs to serve our customers. Midwest has executed an agreement with Northern to transport the natural gas necessary to meet these growth needs.

II. COMMENTS IN SUPPORT

Midwest Natural Gas receives natural gas transportation service from Northern. Midwest Natural Gas participated in the open season held in 2021 soliciting firm throughput service commencing on or after November 1, 2023, to certain delivery points in Northern's Market Area. Following the open season, Midwest Natural Gas executed a long-term contract with Northern for natural gas transportation. The open season resulted in the Northern Lights 2023 project. Midwest Natural Gas has contracted for capacity on Northern's system through the Northern Lights 2023 project. The Public Service Commission of Wisconsin approved the purchase of this important incremental capacity by letter order dated December 16, 2021, Docket No. 3670-GP-2021.

It is no overstatement to say that the natural gas capacity that will be delivered by Northern by the facilities supported by this project are a critical component of our gas planning. Midwest has approximately 19,000 customers. 96.2% of our customers are firm (3.8% are interruptible). 90% of our customers are residential and use natural gas for heating, hot water and cooking. 10% of our customers are commercial. Our commercial customers generally fall into the following categories: schools, hospitals, nursing homes, agricultural and light commercial. They use natural gas to heat their businesses and run their manufacturing equipment. Based on the configuration of heating systems, water tanks and manufacturing equipment, natural gas is the only resource that can economically be utilized. We require the incremental capacity to ensure the company has access to sufficient capacity to cover the anticipated peak demand of our natural gas customers. Midwest Natural Gas requires the level of natural gas deliveries that will be supplied by the Northern Lights 2023 project to ensure we meet our growth obligations to our residential, firm commercial and business customers.

Midwest has very limited options in terms of which pipelines it can purchase firm transportation capacity from. NNG is the only pipeline that Midwest is directly connected to. NNG provides over 90% of the firm transportation capacity Midwest needs to serve the peak day load of its firm customers. Given the location of Midwest's distribution system and how it is laid out (spread out over four laterals that are many miles apart), other pipelines are not interested in building pipeline capacity to serve the natural gas requirements in this region. Some of the larger areas of Midwest's distribution system are growing at the fastest rate in the state of Wisconsin. If other pipelines aren't interested in building infrastructure to our service territory and our system is growing, NNG's Northern Lights 2023 Open Season project is Midwest's only means to serve its customers.

Midwest respectfully submits these comments in support of Northern's Project and asks the Commission to expeditiously review and approve the Northern Lights 2023 Project. Midwest also urges the Commission to grant the certificate of convenience and necessity no later than February 16, 2023, so that Northern may complete construction of the Project facilities by our contracted date of November 1, 2023.

Dated: April 29, 2022

Respectfully submitted,

Paul J. Senty

Midwest Natural Gas, Inc.
Paul J. Senty, President