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Laura Demman
President, Northern Natural Gas and
Kern River Gas Transmission

May 18, 2023

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

Re: Northern Natural Gas Company, 2023 Northern Lights Expansion, Docket No.
CP22-138-000

Dear Secretary Bose:

I am writing to respectfully request the prompt issuance of a certificate order in the above-referenced Northern Lights Expansion project. The Northern Lights Expansion needs to be in-service by November 1, 2023, to meet heating load growth requirements for residents and businesses in Minnesota and Wisconsin. To ensure the necessary interstate pipeline capacity is in place to meet the incremental requirements of 50,889 Dth/day, Northern must receive a certificate order no later than May 26, 2023.

The estimated total cost of the 2023 Northern Lights Expansion project currently before the Commission is \$48.7 million. The project serves ten distinct customers, nine of which are local distribution companies regulated by the Public Service Commission of Wisconsin and/or Minnesota Public Utilities Commission. Each of these regulated customers either received pre-approval for the additional capacity from their state commission or is addressing a need for additional peak day capacity as a result of a state commission-approved gas supply planning process.

Northern's application requested approval by February 16, 2023. Northern engaged with the Commission's staff to develop the schedule for the application, to proactively address concerns and to respond to all issues. All landowner concerns have been resolved. The Final Environmental Impact Statement was issued March 10, 2023. Notably, no landowner has protested the project, and Northern has acquired all property interests required for the construction and operation of the project facilities.

This project requires multiple horizontal directional drills (HDDs). Six of the HDDs on three different pipelines, require work in the Blanding turtle habitat and is therefore subject to a hard stop date of October 1, 2023, imposed by the Minnesota Department of Natural Resources. The HDDs are expected to take a minimum of 60 days; this does not account for delays due to weather or complications with the HDD. A delay in receipt of the certificate order and the notice to proceed with construction will jeopardize Northern's ability to complete the necessary HDDs resulting in failure to complete the project on time and meet the contracted November 1, 2023, in-service date.

Northern's application has been actively supported by customers whose service is to commence November 1, 2023, and who have each executed firm transportation agreements. Northern respectfully requests the Commission's prompt action to issue an order no later than May 26, 2023, so that the necessary construction can begin without delay. Even with a certificate issued by May 26, 2023, Northern will need to request relief from the Commission's presumptive stay rule.

I appreciate the efforts of the Commission and its staff. I am available at your convenience either in person or via telephone to answer any questions the Commission may have.

Respectfully,

A handwritten signature in black ink that reads "Laura Demman". The signature is written in a cursive, flowing style.

Laura Demman
President

cc: Chairman Willie L. Phillips
Commissioner James Danly
Commissioner Allison Clements
Commissioner Mark C. Christie
All parties