



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

June 20, 2024

***Via eFiling***

Ms. Debbie-Anne Reese, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

Re: Letter Order Pursuant to § 375.307  
Northern Natural Gas Company

Docket No. CP24-60-000

Dear Ms. Reese:

Northern Natural Gas Company (Northern) hereby submits for filing with the Federal Energy Regulatory Commission (FERC) in the above-referenced docket Northern's response to the data request issued by FERC staff June 13, 2024. FERC's request and Northern's response is attached.

Any questions regarding the filing should be directed to the undersigned at (402) 398-7138.

Respectfully submitted,

/signed/ Donna Martens

Donna Martens  
Senior Regulatory Analyst

cc: Parties of record

Northern Natural Gas Company  
Data Response Form For Docket No. CP24-60-000  
Northern Lights 2025 Expansion

Requesting Party: FERC  
Reference No: FERC-DR4-01  
Requester's Name: Marsha K. Palazzi  
Subject: Exhibit N - ROE

**Data Request 1:**

**Instructions for any spreadsheets to be provided in response to this data request:** All workpapers must be submitted, with formulas, in spreadsheet format acceptable under the Commission's eFiling rules, such as Microsoft Excel. All spreadsheets must contain all the formulas necessary to calculate the requested rates. If the spreadsheets use macros, functions or other techniques to perform iterative functions, Northern should provide an explanation of the macros or functions used, where they are located, and how to initiate those functions. All macros and functions should not be set at a default state to run upon opening the spreadsheet. All formulas, variables and results should be visible and not hidden. The spreadsheets should not use security features that prevent copying, modification, or printing – although Northern may provide separate spreadsheets that do have these features activated. The spreadsheets should not contain any links to sources outside the spreadsheet document. Northern should provide a version for presentation purposes, such as in PDF.

Provide justification for Northern's proposed return on equity (ROE) of 12 percent as listed in Exhibit N. Please state whether the ROE used is the last stated and approved ROE and, if so, also provide the docket number and/or cite to the order where it was approved.

**Response:**

The 12% rate of return on equity (ROE) is based on the 13.42% pre-tax rate of return agreed to in Article I, page 4 of Northern's Stipulation and Agreement of Settlement for its RP03-398 and RP04-155 rate case proceedings filed March 25, 2005, and approved by the Commission June 20, 2005. Subsequently, the Commission accepted Northern's use of a 12% ROE. On its September 11, 2013, Order on Rehearing and Compliance in Docket No. RP11-2061, the Commission accepted Northern's request to use the 12% ROE, based on the 13.42% pre-tax rate of return reflected in the 2005 Settlement, in the calculation of the appropriate percentage to use under the no-profit method with respect to the reservation charge credits Northern should provide during force majeure outages. Northern's most recent rate case settlements in Docket Nos. RP19-1353 and RP22-1033 did not stipulate an allowed return on equity. Therefore, Northern used its last approved stipulated ROE of 12% to develop the cost of service calculation reflected in the Exhibit N to this filing.

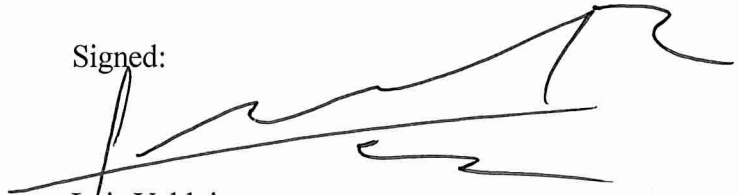
**VERIFICATION**

**STATE OF NEBRASKA**            )

**COUNTY OF DOUGLAS**        )

Luis Valdvia, being duly sworn, on oath, states that he is Manager, Rates and Tariffs, for Northern Natural Gas and is duly authorized to make this affidavit; that he has read the foregoing Data Response of such Company and is familiar with the contents thereof; that all the facts therein are true and correct to the best of his knowledge, information and belief.

Signed:



Luis Valdvia  
Manager, Rates and Tariffs

**SUBSCRIBED AND SWORN TO**, before me, this *20<sup>th</sup>* day of June 2024.



Notary Public in and for  
Douglas County, Nebraska

My commission expires:



## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated this 20 day of June 2024.



Donna Martens  
Senior Regulatory Analyst  
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