



414 Nicollet Mall  
Minneapolis, Minnesota 55401-1993

November 21, 2018

—Via Electronic Filing—

Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, Minnesota 55101

RE: INFORMATION REQUEST RESPONSES  
2017 ANNUAL SERVICE QUALITY REPORT  
DOCKET NO. G002/M-18-316

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits responses to the Minnesota Public Utilities Commission's Information Requests 1 through 6.

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document, and served copies on all parties on the attached service list. If you have any questions regarding this filing, please contact me at (612) 330-2889 or [pamela.k.gibbs@xcelenergy.com](mailto:pamela.k.gibbs@xcelenergy.com).

Sincerely,

/s/

PAMELA K. GIBBS  
REGULATORY AFFAIRS CASE SPECIALIST

c: Service List

- Not Public Document – Not For Public Disclosure  
 Public Document – Not Public Data Has Been Excised  
 Public Document

Xcel Energy

Docket No.: G002/M-18-316

Response To: MN Public Utilities Information Request No. 1  
Commission

Requestor: Marc Fournier

Date Received: October 12, 2018

---

Question:

Please provide an analysis of whether any of the following reports or data would enhance the Commission's evaluation of the company's level of service quality:

- a. The data required under Title 49 Code of Federal Regulations §192.1007 (e):

Performance measures developed from an established baseline to evaluate the effectiveness of a company's Integrity Management (IM) program. These performance measures include the following:

- (i) Number of hazardous leaks either eliminated or repaired as required by § 192.703(c) of this subchapter (or total number of leaks if all leaks are repaired when found), categorized by cause;
- (ii) Number of excavation damages;
- (iii) Number of excavation tickets (receipt of information by the underground facility operator from the notification center);
- (iv) Total number of leaks either eliminated or repaired, categorized by cause;
- (v) Number of hazardous leaks either eliminated or repaired as required by § 192.703(c) (or total number of leaks if all leaks are repaired when found), categorized by material; and

- (vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the operator's IM program in controlling each identified threat.
  
- b. A summary of any 2017 emergency response violations cited by MNOPS along with a description of the violation and remediation in each circumstance; and
  
- c. The number of violation letters your company has received from MnOPS during the year in question.

Response:

The categories of data for which the Commission has asked the Company to provide an analysis in this Information Request relate primarily to natural gas pipeline safety and specifically, attributes of a utility's integrity management program, rather than utility service quality. Under Minn. Stat. Sections 299J.01, *et seq.*, the Minnesota Office of Pipeline Safety (MNOPS) is responsible for the regulation of gas pipeline safety in Minnesota. Additionally, "by agreement with the United States Secretary of Transportation," MNOPS acts "as agent for the United States Secretary of Transportation to implement the federal Hazardous Liquid Pipeline Safety Act," the "federal Natural Gas Pipeline Safety Act," and "federal pipeline safety regulations with respect to interstate pipelines located within this state." The Company also reports to the federal Pipeline and Hazardous Materials Safety Administration (PHMSA) with respect to issues of pipeline safety.

Although elements of pipeline safety intersect with service quality – and both are squarely in the public interest – we believe the two are fundamentally different topics. The Commission recognized this previously in approving our natural gas emergency response performance threshold in our Quality of Service (QSP) tariff saying, "Further, while public safety is paramount and trumps most other factors in the public interest equation, public safety is the primary responsibility of the Minnesota Office of Pipeline Safety, not this Commission."<sup>1</sup> Subsequent to this, the Commission initiated a proceeding that established a comprehensive set of service quality reporting for all Minnesota natural gas utilities. This reporting included some service quality indicators that overlapped with pipeline safety, but these were limited to emergency

---

<sup>1</sup> See ORDER APPROVING MODIFIED GAS EMERGENCY RESPONSE STANDARD, DETAILING REPORTING REQUIREMENTS, AND REQUESTING COLLABORATIVE EFFORT TO DEVELOP TRANSPARENT REPORTING STANDARDS at page 4, Docket No. E,G002/CI-02-2034 (May 6, 2008),

response performance and contemporaneous reports regarding natural gas issues as they occur on the system.<sup>2</sup>

Notwithstanding that some pipeline safety data also relates to service quality, we believe the categories of data identified in this Information Request generally are not good and clear indicators of service quality. Additionally, they require knowledge of MNOPS and other gas safety- and operational-related protocols for proper context.

- a. The metrics outlined in Title 49 CFR §192.1007(e) are specifically designed to measure performance and evaluate the effectiveness of the Company's Natural Gas Distribution Integrity Management Program. The majority of these metrics are reported annually on the Gas Distribution Department of Transportation (DOT) annual report required by 49 C.F.R. §191.11.

This data is important from a safety and integrity management standpoint. It tracks how many leaks were discovered and repaired on the Company's system, categorized by both cause and pipe material. The data, however, requires substantial context for interpretation—even within the safety and integrity management paradigm. For example, it is important to understand how and why the Company categorizes and prioritizes types of leaks, how the Company surveys its system, and what is included in each category of leak cause.

That said, we already provide a portion of this information in our Annual Natural Gas Service Quality Report each May 1 that relates to service quality – namely, the numbers of excavation damages to which we respond. We view our response to these incidents as a component of our overall gas emergency response performance. We also could supplement this information with the total number of facility locating requests that we receive. We view this data as both safety-related and an aspect of our service, because we are being asked to respond to perform facility locates in the name of public safety.

The remaining items however, do not meaningfully inform customer service quality. Although we could provide the data outlined in 49 C.F.R. §192.1007(e) in our May 1 Annual Report, it is operational data that we believe is not meaningful to an assessment of the Company's service quality.

- b. The Company provides its natural gas emergency response performance in both its May 1 Annual Service Quality Report and its May 1 QSP Tariff Annual Report. MNOPS emergency response violations relate to operational and MNOPS protocols rather than service quality. From a service-quality

---

<sup>2</sup> See ORDER SETTING REPORTING REQUIREMENTS, *In the Matter of a Commission Investigation Into Gas Utility Service Quality Standards*, Docket No. G999/CI-09-409 (August 26, 2010).

perspective, the relevant information about all MNOPS reportable events is captured in the log of Major Events provided in our May 1 Annual Service Quality Report. (See the log of Major Events provided as Attachment M in our most recent annual report in Docket No. G002/M-18-316). There, the Company reports on a number of major events, including how many customers were affected, what actions the Company took to respond to the events, how long gas was off, etc. We believe including additional information regarding MNOPS protocols will not enhance the analysis of the Company's service quality related to these events and may distract from the relevant data. However, we are open to providing copies of any reports that are in a closed status for informational purposes.

In 2017, the Company received one citation, which related to an event on August 4, 2017, in which 19 people in Hamburg, MN were evacuated due to a natural gas pipeline leak at 3:30 p.m. The Company was on site managing the situation when the fire department arrived at 4:06 p.m. At that time, the fire department, rather than the Company, contacted the MNOPS Duty Officer (MDO) to inform MNOPS of the evacuation. MNOPS issued an emergency response violation citation because the Company is required to contact the MDO immediately when 10 or more people are evacuated in an emergency response situation. For remediation of this violation, the Company informed MNOPS that it had included the MNOPS Reportable Event Policy in its Pipeline Compliance & Standards Manual and provided MNOPS with a copy of the manual. On October 6, 2017, we received a letter from MNOPS declaring that the case was closed.

As this demonstrates, the issuance of, and Company response to, emergency response violations addresses operational procedures and MNOPS protocols, and is not directly related to service quality. However, as we have noted we are open to providing these for informational purposes as part of our May 1 annual service quality reports once they are in a closed status.

- c. MNOPS violation letters relate to safety rather than service quality. MNOPS violation letters are typically triggered by a MNOPS inspection, damage that occurred in the field, or a complaint from an excavator. MNOPS conducts a variety of inspections including construction sites and our control center.

Upon receipt of a MNOPS violation letter, the Company is given a set amount of time (determined by MNOPS) to provide a response outlining a remediation plan or other steps taken to remediate the violation. MNOPS closes these items with either a letter or a verbal notification. Annually, Company staff meets with MNOPS to review the incidents that occurred in the previous year

and their disposition. Because violation letters also relate specifically to pipeline safety rather than service quality, we do not believe it is appropriate to include them in the annual service quality report.

The Commission already has a robust and comprehensive set of natural gas service quality reporting requirements – and the Company additionally reports another view of its gas emergency response performance under its QSP tariff. Should the Commission disagree with our assessment regarding these safety-focused aspects of our natural gas service, we are, of course, happy to provide any of this data. For the reasons noted above, however, we believe it generally would not enhance the evaluation of the Company’s level of service quality.

---

Preparer: Ray Gardner / Christopher Akins / Lisa Kallberg  
Title: Director / Manager Gas Stds / Principal Gas Stds Consultant  
Department: Gas Integrity Management Programs  
Telephone: 303-571-3904 / 303-571-3298 / 651-229-2282  
Date: November 21, 2018

- Not Public Document – Not For Public Disclosure  
 Public Document – Not Public Data Has Been Excised  
 Public Document

Xcel Energy

Docket No.: G002/M-18-316

Response To: MN Public Utilities Information Request No. 2  
Commission

Requestor: Marc Fournier

Date Received: October 12, 2018

---

Question:

Please identify any other PHMSA and MnOPS reporting requirements not presently collected by the Commission that gas utilities might suggest as being useful in order to give the Commission a fuller picture of a gas utility's service quality performance. This may include reporting required by 49 CFR Part 191 such as the Incident Report required by §191.9 and the Annual Report required by §191.11

Response:

As noted in our response to MPUC Information Request No. 1, and as their names suggest, the federal Pipeline and Hazardous Materials Safety Administration (PHMSA) and Minnesota Office of Pipeline Safety (MNOPS) primarily are concerned with pipeline safety, not utility service quality. The reports the Company submits to PHMSA and MNOPS, similarly, concern safety rather than service quality. As a result, we do not believe the information covered in those reports—and that is not already being provided to the Commission in our annual service quality report—would assist the Commission in assessing a gas utility's service quality performance.

Notwithstanding the foregoing, we identify the following list of PHMSA and MNOPS reports that are not currently included in our annual gas service quality filing. We do not believe, however, that these reports would enhance the Commission's analysis of service quality.

**PHMSA Reports** (Submitted to both PHMSA and MNOPS)

- DOT Annual Gas Distribution Report (§191.11). Includes general system and safety information for only the Minnesota natural gas distribution system.
- DOT Annual Gas Transmission Report (§191.17). Includes general system and safety information for both the Minnesota natural gas transmission system and the South Dakota transmission line serving the Angus Anson plant.

- The following incident reports are triggered by specific qualifying events as defined in §191.3. The Company has not had a qualifying event that required such a report since 2010.
  - Gas Distribution Incident Reports (§191.9)
  - Gas Transmission Incident Reports (§191.15)
- Safety Related Condition Reports (§191.23). Safety-related condition report for distribution and transmission lines. The Company has not had a qualifying event triggering this report.
- Distribution Systems: Mechanical Fitting Failure Reports (§191.12) Annual safety report on mechanical fittings that is uploaded on the PHMSA website with a copy sent to MNOPS.

### **MNOPS Reports**

- MNOPS Quarterly Damage Report: Report used by MNOPS to evaluate the effectiveness of Minnesota's damage prevention laws.

---

Preparer: Ray Gardner / Lisa Kallberg  
Title: Director, Gas Integrity Management Program / Principal Gas Standards  
Department: Gas Engineering / Gas Standards  
Telephone: 303-571-3904 / 651-229-2282  
Date: November 21, 2018



- Not Public Document – Not For Public Disclosure  
 Public Document – Not Public Data Has Been Excised  
 Public Document

Xcel Energy

Docket No.: G002/M-18-316

Response To: MN Public Utilities Information Request No. 3  
Commission

Requestor: Marc Fournier

Date Received: October 12, 2018

---

Question:

Please provide your company's standard customer service window for customer premise visits (when the customer's presence is required).

Response:

We do not have a standard "customer service window" for customer premise visits, when the customer's presence is required. Rather, we will contact the customer and the customer selects the date and time that works best for them. If our field crew needs to gain access to the premise and no one is home, we leave a door tag asking the customer to call to arrange a time when the customer is available. Thus, we perform the premise visit at the customer's convenience. The services listed below are examples of when the customer's presence is required:

- Meter Turn-On
  - Meter Unlock
  - Meter Checking
  - Meter Validating/Testing
  - Requested Re-light
- 

Preparer: Daniel Connoy / Marc Loken

Title: Operations Mgr / Operations Mgr

Department: St Paul Gas Operations / St Cloud Gas Operations

Telephone: 651-229-2356 / 320-980-1162

Date: November 21, 2018

- Not Public Document – Not For Public Disclosure  
 Public Document – Not Public Data Has Been Excised  
 Public Document

Xcel Energy

Docket No.: G002/M-18-316

Response To: MN Public Utilities Information Request No. 4  
Commission

Requestor: Marc Fournier

Date Received: October 12, 2018

---

Question:

Please provide the rationale for the length of your customer service window for customer premise visits (when the customer's presence is required).

Response:

We schedule customer premise visits at the customer's convenience, as described in our response to MPUC Information Request No. 3.

---

Preparer: Daniel Connoy / Marc Loken

Title: Operations Mgr / Operations Mgr

Department: St Paul Gas Operations / St Cloud Gas Operations

Telephone: 651-229-2356 / 320-980-1162

Date: November 21, 2018

- Not Public Document – Not For Public Disclosure  
 Public Document – Not Public Data Has Been Excised  
 Public Document

Xcel Energy

Docket No.: G002/M-18-316

Response To: MN Public Utilities Information Request No. 5  
Commission

Requestor: Marc Fournier

Date Received: October 12, 2018

---

Question:

If your company's customer service window for customer premise visits (when the customer's presence is required) is greater than four hours, are there other utilities or businesses that give customers a service window greater than four hours?

Response:

We schedule customer premise visits at the customer's convenience, as described in our response to MPUC Information Request No. 3.

---

Preparer: Daniel Connoy / Marc Loken

Title: Operations Mgr / Operations Mgr

Department: St Paul Gas Operations / St Cloud Gas Operations

Telephone: 651-229-2356 / 320-980-1162

Date: November 21, 2018

- Not Public Document – Not For Public Disclosure  
 Public Document – Not Public Data Has Been Excised  
 Public Document

Xcel Energy

Docket No.: G002/M-18-316

Response To: MN Public Utilities Information Request No. 6  
Commission

Requestor: Marc Fournier

Date Received: October 12, 2018

---

Question:

If your company has a customer service window for customer premise visits (when the customer's presence is required) greater than four hours, is it possible or practical for the company to narrow the window to two or four hours?

Response:

We schedule customer premise visits at the customer's convenience as described in our response to MPUC Information Request No. 3.

---

Preparer: Daniel Connoy / Marc Loken

Title: Operations Mgr / Operations Mgr

Department: St Paul Gas Operations / St Cloud Gas Operations

Telephone: 651-229-2356 / 320-980-1162

Date: November 21, 2018

**CERTIFICATE OF SERVICE**

I, Lynnette Sweet, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

**DOCKET Nos. G002/M-18-316**

Dated this 21<sup>st</sup> day of November 2018

/s/

---

Lynnette Sweet

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_18-316_M-18-316
Ryan	Barlow	Ryan.Barlow@ag.state.mn.us	Office of the Attorney General-RUD	445 Minnesota Street Bremer Tower, Suite 1400 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_18-316_M-18-316
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd.  St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_18-316_M-18-316
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-316_M-18-316
Corey	Conover	corey.conover@minneapolismn.gov	Minneapolis City Attorney	350 S. Fifth Street City Hall, Room 210 Minneapolis, MN 554022453	Electronic Service	No	OFF_SL_18-316_M-18-316
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_18-316_M-18-316
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_18-316_M-18-316
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_18-316_M-18-316
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St  Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_18-316_M-18-316
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_18-316_M-18-316

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Annete	Henkel	mui@mnuilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_18-316_M-18-316
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue  St. Paul, MN 55130	Electronic Service	No	OFF_SL_18-316_M-18-316
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street  St. Paul, MN 551012134	Electronic Service	No	OFF_SL_18-316_M-18-316
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-316_M-18-316
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-316_M-18-316
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-316_M-18-316
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_18-316_M-18-316
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620  St. Paul, MN 551640620	Electronic Service	No	OFF_SL_18-316_M-18-316
Peter	Madsen	peter.madsen@ag.state.mn.us	Office of the Attorney General-DOC	Bremer Tower, Suite 1800 445 Minnesota Street St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_18-316_M-18-316
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_18-316_M-18-316

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_18-316_M-18-316
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-316_M-18-316
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_18-316_M-18-316
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-316_M-18-316
Zeviel	Simpser	zsimpser@briggs.com	Briggs and Morgan PA	2200 IDS Center80 South Eighth Street  Minneapolis, MN 554022157	Electronic Service	No	OFF_SL_18-316_M-18-316
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-316_M-18-316
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-316_M-18-316
Cam	Winton	cwinton@mnchamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_18-316_M-18-316
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_18-316_M-18-316