

September 9, 2019

Mr. Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
Saint Paul, Minnesota 55101-2147

**RE: Letter from the Minnesota Department of Commerce, Division of Energy Resources regarding Greater Minnesota Gas' 2018 Annual Service Quality Report**  
Docket No. G022/M-19-304

Dear Mr. Wolf:

The Minnesota Department of Commerce, Division of Energy Resources (Department) provides the following *Letter* regarding Greater Minnesota Gas' (Greater Minnesota or the Company) *2018 Annual Service Quality Report* (Report) filed with the Minnesota Public Utilities Commission (Commission) on May 1, 2019. In its June 17, 2019 *Comments*, the Department withheld final recommendation pending the provision of additional information in *Reply Comments*. In particular, the Department requested that the Company provide:

- Clarification of the identical data provided in the October and November 2018 Cold Weather Rule (CWR) Reports and, if one of the monthly CWR Reports was reported in error, the Company should refile the corrected corresponding report in Docket No. E,G999/PR-18-2; and
- Clarification of whether the long service extension time for an interruptible customer in July was the result of a construction delay on the part of the customer. If not, please provide a detailed discussion of why this delay occurred.

Greater Minnesota responded to the Department's request for additional discussion and provided clarifying information in *Reply Comments* filed on June 25, 2019. The Company also responded to comments filed by the Office of the Attorney General (OAG) on June 17, 2019. Greater Minnesota also supplemented the record with additional information regarding topics pursuant to the Commission's Order in Docket No. G022/M-18-314.

In terms of the identical data provided in the October and November 2018 CWR Reports, Greater Minnesota stated that its November 2018 CWR report contained an inadvertent error. The Company stated that it reviewed the November 2018 report, along with historical data, and confirmed that the October 2018 report is accurate but the November 2018 CWR report is incorrect. Greater Minnesota submitted a corrected November 2018 CWR report as Attachment A to its *Reply Comments* and submitted the corrected report in Docket No. E,G999/PR-18-2. The Department reviewed these data and confirms that it has been updated. The Department does not have additional discussion on this matter.

The Company also provided additional discussion and clarification regarding the long service extension time for an interruptible customer in July 2018 that the Department noted in its *Comments*. Greater Minnesota clarified that the customer in question placed an early order for a service line for a grain drying facility. The Company stated that the customer did not require gas service until October 2018; as such, the customer and Greater Minnesota agreed that the Company would install the service line at some point during the summer when the Company's service crew was in the area. Greater Minnesota stated that the customer was satisfied with the time required to extend service. Based on the explanation provided by the Company, the Department concludes that the length of time to extend service was reasonable, and the Department does not have additional comment on this matter.

The Commission issued its *Order* in Greater Minnesota's 2017 Annual Service Quality Report on April 12, 2019.<sup>1</sup> In this *Order*, the Commission required Greater Minnesota to provide in the 2018 Report various information regarding its integrity management plan, various emergency response information provided to the Minnesota Office of Pipeline Safety (MnOPS), and a discussion of its deployment of Excess Flow Valves (EFV) pursuant to the Commission's *Order* in Docket No. G999/CI-18-41. In its *Reply Comments*, Greater Minnesota explained that the order was issued at the same time it was preparing its 2018 Report; therefore, the Company provided the required information in its *Reply Comments*. Greater Minnesota provided its integrity management plan performance information filed under 49 CFR 192.1007(e) in Attachment B to its *Reply Comments*. The Company explained that it initially reported 23 damage incidences in its Pipeline and Hazardous Materials Safety Administration (PHMSA) report, but filed an amendment reducing the number of incidences to 21 because two incidences were related to rodent damage.<sup>2</sup> Greater Minnesota also noted that it did not have emergency response violations cited by MnOPS or violation letters during 2018.

In terms of EFV monitoring and deployment metrics, the Company stated that it appreciated the opportunity to discuss this topic, but it noted that its affected customer numbers are negligible compared to other utilities. Greater Minnesota believes that those larger utilities are better suited to developing meaningful EFV metrics. Greater Minnesota noted that it currently has EFVs installed on approximately half of its services. The Department appreciates Greater Minnesota's discussion regarding EFVs and does not offer additional comment regarding the Company's position. Based on Greater Minnesota's discussion, the Department assumes that the Company will accept any metrics proposed by the larger gas utilities.

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<sup>1</sup> Docket No. G022/M-18-314.

<sup>2</sup> The Department notes that Greater Minnesota discussed these incidences of rodent damage in its initial Report in this docket.

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Based on the Department's analysis of the 2018 Report and the Company's *Reply Comments*, the Department recommends that the Commission accept Greater Minnesota's 2018 Report.

The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ ADAM J. HEINEN  
Rates Analyst

AJH/ja

## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce  
Letter**

**Docket No. G022/M-19-304**

Dated this **9<sup>th</sup>** day of **September 2019**

**/s/Sharon Ferguson**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.	202 S. Main Street  Le Sueur, MN 56058	Electronic Service	No	OFF_SL_19-304_M-19-304
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_19-304_M-19-304
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_19-304_M-19-304
Brian	Gardow	bgardow@greatermngas.com	Greater Minnesota Gas, Inc.	PO Box 68  Le Sueur, MN 56058	Electronic Service	No	OFF_SL_19-304_M-19-304
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.	202 South Main Street P.O. Box 68 Le Sueur, MN 56058	Electronic Service	No	OFF_SL_19-304_M-19-304
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.	PO Box 68 202 South Main Street Le Sueur, MN 56058	Electronic Service	No	OFF_SL_19-304_M-19-304
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-304_M-19-304
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_19-304_M-19-304