

June 7, 2019

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

RE: **Response Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G004/M-19-280

Dear Mr. Wolf:

Attached are the Response Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Compliance Filing of Great Plains Natural Gas Co. – *Gas Service Quality Annual Report*

The Department continues to recommend that the Minnesota Public Utilities Commission (Commission) **accept** the gas service quality annual report submitted by Great Plains Natural Gas Co. The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ GEMMA MILTICH
Financial Analyst

GM/ja
Attachment



Before the Minnesota Public Utilities Commission

Response Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. G004/M-19-280

I. INTRODUCTION

On April 24, 2019, Great Plains Natural Gas Company (Great Plains or the Company) filed its annual gas service quality report (Report) for 2018 with the Minnesota Public Utilities Commission (Commission). Annual service quality reports provide the Commission with an opportunity to review the utility's service quality metrics and determine whether the utility is meeting the relevant service quality standards.

After reviewing the Company's Report, the Minnesota Department of Commerce, Division of Energy Resources (Department) filed its initial Comments in the current docket on May 23, 2019. The Department recommended that the Commission (1) accept Great Plains' Report and (2) continue to require Great Plains to report its distribution system performance measures as outlined in item 3 in the Commission *Order* for Docket No. G004/M-18-286, issued April 12, 2019. The Department also recommended that Great Plains provide in its Reply Comments (1) an explanation or additional context around the reported number of 2018 gas line damage incidents and (2) confirmation of the accuracy of the number of gas line damage incidents and service interruptions for 2017 and 2018. Great Plains filed its Reply Comments on May 31, 2019 and provided the information recommended in the Department's initial Comments.

II. DEPARTMENT ANALYSIS

The Department thanks Great Plains for providing the additional information as requested, and, upon review of this information, the Department is satisfied with the Company's explanations and revised data. The following sections A and B discuss the information provided by the Company in its Reply Comments and highlight updates to select service quality data.

A. GREAT PLAINS' EXPLANATION FOR THE NUMBER OF 2018 GAS LINE DAMAGE INCIDENTS

The Department noted in its initial Comments that Great Plains reported just 14 damage incidents caused by factors outside the Company's control for 2018; this number is significantly lower than the corresponding data in all prior years documented. In addition, the *total* number of gas line damage incidents reported in 2018 was the lowest of all years documented. The Company explained on page 1 of its Reply Comments that the reduction in the number of gas line damage incidents reported for 2018 could be a result of Great Plains' efforts to work with contractors to prevent damages. According to the Company, educating contractors on the best approach to excavating the Great Plains' PVC pipeline system has been a component of the Company's efforts to reduce gas line damages. While this explanation may not necessarily

account for the low number of gas line damage incidents caused by factors *outside* of Great Plains' control (i.e. damages not caused by Company employees or contractors), the Department appreciates the Company's response and has no further inquiries on this matter.

B. ACCURACY OF 2017 AND 2018 GAS LINE DAMAGE INCIDENT AND SERVICE INTERRUPTION DATA

The Department's initial Comments observed that in both 2017 and 2018, Great Plains reported identical numbers for gas service interruptions and gas line damages. These reported figures would indicate that for 2017 and 2018, every gas line damage incident caused a service interruption, and every service interruption was caused by gas line damage. However, in earlier years (2011 - 2016), the number of gas line damage incidents and service interruptions do not perfectly align with one another. At the request of the Department, Great Plains reviewed its 2017 and 2018 gas service interruption and gas line damage information to verify whether the relevant data was accurately reported for the two years. Great Plains discovered that (1) the Company's 2017 gas service interruption and gas line damage data was reported incorrectly and (2) the Company's 2018 gas service interruptions were reported incorrectly.

Attachment A to the Company's Reply Comments documents the corrected gas service interruption and gas line damage information for 2017 and 2018, as applicable. Based on the revised data provided by Great Plains, the Department has modified the corresponding Tables 9 and 10 that were included in its initial Comments. Please see the following updated Tables.

The following Table 9 of the Department's initial Comments¹ outlined the Company's reported gas line damage information.

Table 9: Damaged Gas Lines for Great Plains

Calendar Year	Number of Gas Lines Damaged:			Miles of Gas Line Operated in Minnesota	Damage Incidents per 100 Miles of Gas Line
	Caused by Great Plains (A)	Caused by Factors Outside of Great Plains' Control (B)	Total (A + B)		
2011	2	28	30	507	5.92
2012	14	54	68	522	13.03
2013	9	32	41	515	7.96
2014	5	33	38	519	7.32
2015	11	37	48	524	9.16
2016	8	30	38	522	7.28
2017	10	24	34	522	6.51
2018	14	14	28	536	5.22

¹ See Department's Comments in Docket No. G004/M-19-280 at page 11.

Using the corrected gas line damage information provided by Great Plains, the Department has revised the 2017 data in the following Table 9.

REVISED Table 9: Damaged Gas Lines for Great Plains

Calendar Year	Number of Gas Lines Damaged:			Miles of Gas Line Operated in Minnesota	Damage Incidents per 100 Miles of Gas Line
	Caused by Great Plains (A)	Caused by Factors Outside of Great Plains' Control (B)	Total (A + B)		
2011	2	28	30	507	5.92
2012	14	54	68	522	13.03
2013	9	32	41	515	7.96
2014	5	33	38	519	7.32
2015	11	37	48	524	9.16
2016	8	30	38	522	7.28
2017	13	21	34	522	6.51
2018	14	14	28	536	5.22

The following Table 10 of the Department's initial Comments² provides details around the Company's reported gas service interruptions.

Table 10: Service Interruptions for Great Plains

Calendar Year	Number of Service Interruptions:			Total Number of Customers Affected	Average Duration of Interruption in Minutes
	Caused by Great Plains (A)	Caused by Factors Outside of Great Plains' Control (B)	Total (A + B)		
2011	22	3	25	113	190
2012	13	35	48	115	200
2013	7	22	29	221	347
2014	3	26	29	123	1,064
2015	9	25	34	250	2,080
2016	6	32	38	213	996
2017	10	24	34	146	674
2018	14	14	28	252	135

Using the corrected gas service interruption information provided by Great Plains, the Department has revised the 2017 and 2018 data in the following Table 10. Additionally, it has come to the Department's attention that in its initial Comments, the Department used a mix of average and total figures to calculate the average interruption duration for the years

² See Department's Comments in Docket No. G004/M-19-280 at page 12.

documented. The Department has therefore corrected each data point in the last column of Table 10.

REVISED Table 10: Service Interruptions for Great Plains

Calendar Year	Number of Service Interruptions:			Total Number of Customers Affected	Average Duration of Interruption in Minutes
	Caused by Great Plains (A)	Caused by Factors Outside of Great Plains' Control (B)	Total (A + B)		
2011	22	3	25	113	146
2012	13	35	48	115	222
2013	7	22	29	221	308
2014	3	26	29	123	330
2015	9	25	34	250	551
2016	6	32	38	213	236
2017	12	18	30	146	180
2018	8	11	19	252	166

III. DEPARTMENT CONCLUSIONS AND RECOMMENDATIONS

Based on its review, the Department continues to conclude that the Company has met all the applicable reporting requirements and recommends that the Commission accept Great Plains' 2018 Annual Service Quality Report.

The Department also continues to recommend that the Commission continue to require Great Plains to report its distribution system performance measures as outlined in item 3 in the Commission *Order* for Docket No. G004/M-18-286, issued April 12, 2019, as follows:

- a. the utility's filing under 49 CFR 192.1007 (e): integrity management plan performance measures; monitoring results; and evaluation of effectiveness in a manner to establish a baseline for ongoing reporting.
- b. a summary of any [2019] emergency response violations cited by MNOPS along with a description of the violation and remediation in each circumstance.
- c. the number of violation letters received by the utility from MNOPS during the year in question.
- d. a discussion of how to provide ongoing monitoring and metrics towards the deployment of Excess Flow Valves and manual service line shutoff valves pursuant to the Commission's order in Docket No. G-999/CI-18-41.

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
Response Comments**

Docket No. G004/M-19-280

Dated this 7th day of June 2019

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck, ND 585014092	Electronic Service	No	OFF_SL_19-280_M-19-280
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_19-280_M-19-280
Ian	Dobson	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_19-280_M-19-280
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_19-280_M-19-280
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_19-280_M-19-280