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December 31, 2015

VIA ELECTRONIC FILING

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

Re: **Proposal for Revised Reporting Metric Regarding Service Extensions for Annual Service Quality Reporting**
Docket No. _____

Dear Mr. Wolf:

Attached hereto, please find a Greater Minnesota Gas, Inc.'s Proposal for Revised Reporting Metric Regarding Service Extensions for Annual Service Quality Reporting for filing in a new docket.

All individuals identified on the attached service list have been electronically served with the same.

Thank you for your assistance. Please do not hesitate to contact me should you have any questions or concerns or if you require additional information. My direct dial number is (507) 665-8657 and my email address is kanderson@greatermngas.com.

Sincerely,

GREATER MINNESOTA GAS, INC.

/s/

Kristine A. Anderson

Enclosure

cc: Service List

CERTIFICATE OF SERVICE

I, Kristine Anderson, hereby certify that I have this day served a true and correct copy of the following document to all persons at the addresses indicated on the attached list by electronic filing, electronic mail, or by depositing the same enveloped with postage paid in the United States Mail at Le Sueur, Minnesota:

**Greater Minnesota Gas, Inc.'s Proposal for
Revised Reporting Metric Regarding Service Extensions
for Annual Service Quality Reporting
Docket No. _____**

filed this 31st day of December, 2015.

/s/ Kristine A. Anderson
Kristine A. Anderson, Esq.
Corporate Attorney
Greater Minnesota Gas, Inc.

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2015
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.	202 S. Main Street Le Sueur, MN 56058	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2015
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2015
Brian	Gardow	bgardow@greatermngas.com	Greater Minnesota Gas, Inc.	PO Box 68 Le Sueur, MN 56058	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2015
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.	202 South Main Street P.O. Box 68 Le Sueur, MN 56058	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2015
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2015
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.	PO Box 68 202 South Main Street Le Sueur, MN 56058	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2015
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2015
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2015

STATE OF MINNESOTA

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
John Tuma	Commissioner
Betsy Wergin	Commissioner

MPUC Docket No. _____

**PROPOSAL FOR REVISED REPORTING
METRIC REGARDING SERVICE EXTENSIONS
FOR ANNUAL SERVICE QUALITY REPORTING**

OVERVIEW

Greater Minnesota Gas, Inc. (“GMG”) submits this filing to the Minnesota Public Utilities Commission (“Commission”) to propose a new metric for the service extension response time component of its Annual Gas Service Quality Report. Pursuant to the Commission’s Order in Docket No. G-022/M-14-964, GMG is required to propose such a new metric and was directed to file the proposal in a new docket number. GMG respectfully requests that the Commission approve its proposed service extension response time metric for reporting beginning with its Annual Service Quality Report for 2015.

In the preparation of its new metric proposal, GMG reviewed information from other states, the records in historical Annual Service Quality dockets for GMG and other Minnesota natural gas providers, notes from various discussions about the issue with Department staff and Commission staff, and information submitted in GMG’s current open docket regarding its 2014 Annual Service Quality Report: namely, Docket No. G-022/M-15-434.

As the Commission is aware, GMG provides a unique model for providing safe, reliable, accessible, and affordable gas to unserved and/or underserved areas of rural Minnesota that previously went without natural gas. Hence, GMG’s service model is unlike the service models of the other regulated natural gas providers in Minnesota. As a result of GMG’s main extension approach, GMG’s service extension data does not match the reporting metric historically requested by the Department in a manner consistent with the other natural gas providers.

STATUTORY AND RULE REQUIREMENTS

Minnesota Statute § 216B.029 requires that service quality standards for a distribution utility must include service extension response time. For purposes of reviewing whether the standard was met, Minnesota Rule 7826.1600 requires that regulated utilities report on service extension response times including the number of customers requesting service to a location not previously served by the utility and the intervals between the date that the service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service; and, the number of customers requesting service to a location previously served by the utility but not served at the time of the request, and the interval of the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service. No definitions or clarifying information are provided in any statutory or administrative rule framework.

Interestingly, the statutory framework contemplates the notion that not all distribution utilities are identical, noting that minimum performance standards developed under the statute must treat similarly situated distribution systems similarly, but must also recognize differing characteristics of system design and hardware. Minn. Stat. § 216B.029, Subd. 1(c) (2015).

DEPARTMENT AND COMMISSION REQUIREMENTS

The Commission developed annual service quality reporting requirements to alert it to customer service and consumer protection issues and to give it the tools necessary to monitor, protect, and maintain service quality by natural gas companies. (Order, Docket No. G-999/CI-09-409, August 26, 2010, p. 4.) The goal of the Department is to employ broad-based statistical reporting metrics in order to engage in comparative review across regulated utilities. In fact, the annual service quality reporting requirement was borne out of OES's desire to shift from assessing each utility's service quality individually to conducting review based on the use of baseline data and simultaneous review. (See Order, Docket No. G-999/CI-09-409, August 26, 2010, p. 2.) However, neither the statute nor the rule requires that all utilities be compared to one another. Rather, the goal of service quality reporting is to ensure that a utility's customers are receiving satisfactory service from a utility. The Commission endorsed reporting requirements because they enable Commission to monitor the quality of service of each utility's distribution system over time and across its service area" in order to "facilitate the Commission's ability to identify concerns that threaten the quality of service provided to ratepayers." (Order, Docket No. G-999/CI-09-409, August 26, 2010, p. 4.)

In various dockets considering a variety of issues, both the Commission and the Department that GMG is unique among Minnesota's gas distribution system in a number of ways, including its service model. With specific respect to the service extension data component of annual service quality reporting, Commission staff recently noted that, "the evolution of GMG's service territory is much different than a company such as CPE or any of the large gas distribution companies"; and, that based on GMG's construction and sales model, the requested metric does

not conform perfectly with reportable data for GMG as there is no clearly defined request interval to report.

COLLATERAL REPORTING INFORMATION

GMG reviewed annual service quality reporting discussions for the other Minnesota natural gas utilities with specific respect to service extension interval reporting. That survey indicated that, even with the uniform service extension metric, companies include slightly different data. However, all of the companies appear to only include data regarding individual premises requests for service, either new or renewed, for gas service in or adjacent to already existing gas main. It does not appear that the other natural gas utilities have supplied any information regarding requests they receive for extending natural gas service to an entirely new geographic area, which are most often denied outright.

GMG also reviewed service quality reporting requirements in other states as it prepared the proposal contained herein. Unfortunately, it did not identify any reporting standards that might be instructive for purposes of developing a reporting metric that is analogous to GMG's business model.

GMG invited discussion regarding service extension reporting metric changes with Department staff. However, staff indicated that it felt that it made more sense for GMG to propose an alternate reporting metric and then the Department could consider and comment on it.

PROPOSED NEW SERVICE EXTENSION REPORTING

As GMG noted in its Annual Service Quality Report for 2014, GMG respects the necessity for Commission oversight of each utility's quality standards, and GMG has done everything that it can to be responsive to that. Therefore, GMG proposes that it provide service extension data as follows:

- Number of new geographical areas served during a calendar year.
- Number of new geographical areas that were promised service during a calendar year but did not ultimately receive service, along with explanatory information as to why service was not extended.
- Number of new on-main customers served during a calendar year.
- Number of on-main customers who requested but were denied service during a calendar year, along with explanatory information as to why service was not extended.
- Number of customers requesting service to a location previously served by the utility but not served at the time of the request, along with the service extension interval.
- Number of complaints specifically related to delays in extending service, along with explanatory information regarding the nature of the delay and resolution.

GMG believes that its proposed metric allows for oversight with regard to timely service extension in a manner that is measurable given GMG's business model. It allows the Commission to examine whether GMG is meeting its commitments to extend service; to monitor, protect, and maintain service quality by GMG; and, to be alerted to customer service and consumer protection issues. Consequently, it serves all of the functions that the service quality reporting standards were created to address.

REQUEST FOR COMMISSION ACTION

GMG appreciates the Commission's consideration of its proposed reporting metrics for service extension data in its Annual Service Quality Reports. GMG respectfully requests that the Commission approve use of proposed reporting metrics beginning with its Annual Service Quality Report for 2015.

Dated: December 31, 2015

Respectfully submitted,

/s/

Kristine A. Anderson
Corporate Attorney
Greater Minnesota Gas, Inc.
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Le Sueur, MN 56068
Phone: 888-931-3411