



414 Nicollet Mall  
Minneapolis, Minnesota 55401

March 30, 2020

**--Via Electronic Filing--**

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

RE: COMPLIANCE FILING  
COMMISSION INVESTIGATION INTO EXCESS FLOW VALVES  
DOCKET NO. G-999/CI-18-41

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits this filing in compliance with the Minnesota Public Utilities Commission's July 31, 2019 Order regarding Order Point 4 in the above-referenced docket.

Pursuant to Minn. Stat. §216.17, subd. 3, we have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on all parties on the attached service list. Please contact Pamela Gibbs @ [pamela.k.gibbs@xcelenergy.com](mailto:pamela.k.gibbs@xcelenergy.com) or (612) 330-2889; or Lisa Peterson at [lisa.r.peterson@xcelenergy.com](mailto:lisa.r.peterson@xcelenergy.com) or 612-330-7681 if you have any questions regarding this filing.

Sincerely,

/s/

LISA PETERSON  
MANAGER, REGULATORY ANALYSIS

Enclosures  
c: Service List

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF A COMMISSION  
INVESTIGATION INTO NATURAL GAS  
UTILITIES' PRACTICES FOR INSTALLATION  
OF EXCESS FLOW VALVES AND OTHER  
SIMILAR GAS SAFETY EQUIPMENT

DOCKET NO. G999/CI-18-41

**COMPLIANCE FILING**

## INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits this filing in compliance with the Minnesota Public Utilities Commission's July 31, 2019 ORDER regarding Order Point 4 in the above-referenced docket.

Order Point 4 requires the Company to submit an annual compliance report describing our progress toward complying with Ordering Paragraphs 7a-c from the Commission's August 20, 2018 Order. Ordering Paragraphs 7a-c require the following:

- **Ordering Paragraph 7a** – Identify all the following customers within our service territory that do not already have EFVs and are not within an area that will be upgraded by 2025:
  - K-12 public districts;
  - K-12 non-public schools;
  - Public and private universities and colleges;
  - Hospitals; and
  - Multi-unit residential and nursing facilities.
- **Ordering Paragraph 7b** – Establish and file a plan to have face-to-face meetings with the decision-maker of the customers identified in Ordering Paragraph 7a, eligible under the federal standard for EFVs regarding the purpose of EFV and manual service line shutoff valves, installation policies, and estimated costs.
- **Ordering Paragraph 7c** – Utilities may propose another method for limiting visits to non-public schools, universities and colleges, and multi-unit residential

and nursing facilities based on a size metric. Utilities may also propose a recovery mechanism for the additional requirements of the required communication plans.

Below we provide an update on our progress on complying with the Commission’s Ordering Paragraphs. We also provide a discussion of our vision for future compliance filings in this docket.

## COMPLIANCE FILING

### A. Ordering Paragraph 7a – Identifying Customers

As we noted in our December 18, 2018 Compliance Filing in this docket, we provide service to approximately 1,900 locations that did not already have an EFV or manual shut-off valve installed and were a type of customer listing in Ordering Paragraph 7a. Table 1 below shows these customers, broken down by location type and customer relationship.

**Table 1**

Location Type	Managed Accounts	BSC-Managed	Non-Managed	Total
Child Day Care Services	0	53	37	90
Colleges, Universities, and Professional Schools	65	1	2	68
Junior Colleges	6	0	0	6
Elementary and Secondary Schools	121	63	20	204
Continuing Care Retirement Communities and Assisted Living Facilities for the Elderly	13	46	15	74
Skilled Nursing Care Facilities	7	32	12	51
General Medical and Surgical Hospitals	12	0	1	13
Lessors of Real Estate (Multi-Unit Residential)	80	1,037	254	1,371
Totals	304	1,228	338	1,877

## **Ordering Paragraph 7b – Communication Plan**

Our communication plan, as approved by the Commission in their July 31, 2019 Order, was a mixture of communication efforts, depending on (1) the existing relationship between the customer and the Company and (2) the type of customer.

For our managed account customers, which are customers that Company representatives meet with on a regular basis, the Company's committed to including a discussion about EFVs and/or manual shut-off curb valves in our regular customer meetings or at industry meetings. In addition, we also included schools, universities, colleges, and hospitals that are non-managed accounts, in our face-to-face meeting list. Existing Company personnel has been tasked with meeting with each customer on the list. This has allowed us to cover our largest customers at minimal additional costs.

We started discussions regarding EFVs with customers in face-to-face meetings in the fall of 2019. In total, our current face-to-face meeting list includes about 190 customers. As of this filing date, we have met with 117 of these customers. Of the customers we have met with so far, 36 have expressed an interest in learning more about these safety valves. These customers were directed to our Builders Call Line specialists for more information and potential next steps. For those customers who choose to have a valve installed, scheduling of the installations would occur when the construction season begins in the spring. Prior to the outbreak of the COVID-19 pandemic, we projected that we'd be able to complete the remaining face-to-face meetings by June 2020. We still project that we will be able to communicate with the remaining customers in this category by the end of June 2020. However, with the COVID-19 pandemic curtailing in-person meetings, we anticipate that most, if not all, of these contacts will take place via phone calls.

For our BSC-managed and non-managed customers, we communicated information about EFVs and manual service shut-off valves via letter. The letter provided detailed information about each customer's right to request an EFV or manual service shut-off valve, the process for making a request, and other relevant information. In addition, we created a call script for our call center representatives, which provided additional information related to EFVs and manual shut-off valves in case customers called for additional information.

The letter campaign was completed in August 2019. In total, we sent letters to about 1,700 customers. We have received approximately ten calls from customers who received letters asking further questions about valve installations. None of these

customers have expressed an interest in pursuing the installation of an EFV or curb valve.

## **B. Ordering Paragraph 7c – Cost Recovery**

We have incurred a small amount of costs to facilitate our communication plan. The costs are related to printing, mailing, and postage for letters to customers, along with the cost of printing materials for our face-to-face meetings with customers. The total costs of these activities were less than \$2,000. We do not expect to incur any significant costs going forward to finish our communication plan. Due to the small amount of costs that the Company has incurred to communicate with customers, we do not plan to request cost recovery of these costs.

## **C. Other EFV Reporting**

The reporting requirements for this annual compliance filing are primarily geared towards our communication plan for EFVs and manual shut-off valves. As we have described above, our initial communication plan is nearly complete. We note that we will be reporting statistics related to EFV and manual shut-off valves in our Gas Service Quality Annual Reports. As discussed in our December 6, 2019 Compliance Filing filed in Docket No. G002/M-19-305, our future Gas Service Quality Annual Reports will include information about the number of customers suitable for EFV installations, number of installations, number of customers who requested installation, percentage of suitable customers with EFVs and number of customers unsuitable for EFVs. Similar information will be provided for manual shut-off valves. We expect to file our next Gas Service Quality annual report on May 1, 2020.

## **CONCLUSION**

The Company respectfully submits this compliance filing to provide the Commission with an update on our progress toward complying with the Commission's order related to our communication plan for the EFV and manual shut-off valve installations.

Dated: March 30, 2020

Northern States Power Company

## 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.        G999/CI-18-41**

Dated this 30<sup>th</sup> day of March 2020

/s/

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Lynnette Sweet  
Regulatory Administrator

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_18-41_Official
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_18-41_Official
David	Blomseth	davidb@communitycoops.com	Community Co-ops of Lake Park	PO Box 329 14583 Hwy 10 W Lake Park, MN 56554	Electronic Service	No	OFF_SL_18-41_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-41_Official
Randy	Dooley	rdooley@dooleypetro.com	Dooley's Natural Gas LLC	3101 3rd Ave SW  Willmar, MN 56201	Electronic Service	No	OFF_SL_18-41_Official
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400  Plymouth, MN 554475142	Electronic Service	No	OFF_SL_18-41_Official
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_18-41_Official
Mike	Gorham	mike@nwgas.com	Northwest Gas of Cass County L.L.C.	1608 NW 4th St  Grand Rapids, MN 55744	Electronic Service	No	OFF_SL_18-41_Official
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St  Bismarck, ND 58501	Electronic Service	No	OFF_SL_18-41_Official
Jack	Kegel	jkegel@mmua.org	MMUA	3025 Harbor Lane N Suite 400  Plymouth, MN 55447-5142	Electronic Service	No	OFF_SL_18-41_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Allen	Krug	allen.krug@xcelenergy.com	Xcel Energy	414 Nicollet Mall-7th fl  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-41_Official
Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-41_Official
Douglas	Lund	doug.lund@ufcmn.com	United Natural Gas, LLC	705 E. 4th Street PO Box 461 Winthrop, MN 55396	Electronic Service	No	OFF_SL_18-41_Official
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-41_Official
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_18-41_Official
Catherine	Phillips	catherine.phillips@we-energies.com	We Energies	231 West Michigan St  Milwaukee, WI 53203	Electronic Service	No	OFF_SL_18-41_Official
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_18-41_Official
Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-41_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-41_Official
Rachel	Sorrentino	rachel@nwgas.com	Northwest Gas	1608 NW 4th St  Grand Rapids, MN 55744	Electronic Service	No	OFF_SL_18-41_Official



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-41_Official
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-41_Official
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-41_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_18-41_Official
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-41_Official
Tim	Thompson	tthompson@lrec.coop	Lake Region Electric Cooperative	PO Box 643 1401 South Broadway Pelican Rapids, MN 56572	Electronic Service	No	OFF_SL_18-41_Official
Teresa	Wenninger	teresa.wenninger@ufcmn.com	United Farmers Cooperative	PO Box 461 Winthrop, MN 55396	Electronic Service	No	OFF_SL_18-41_Official
Mary	Wolter	mary.wolter@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_18-41_Official