

September 16, 2024

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce**
Docket No. G004/M-24-32

Dear Mr. Seuffert:

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

2023 Annual Gas Service Quality Report (Report) submitted by Great Plains Natural Gas Co. (Great Plains or the Company).

Great Plains filed the report on May 1, 2024.

The Department recommends the Minnesota Public Utilities Commission (Commission) **accept Great Plains' report**. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

MBK/ar
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. G004/M-24-32

I. INTRODUCTION

On April 16, 2009, The Minnesota Public Utilities Commission (Commission) opened an investigation into natural gas service quality standards and requested comments from the Minnesota Department of Commerce, Division of Energy Resources (Department) and all Minnesota regulated natural gas utilities in Docket No. G999/CI-09-409. The Order dated January 18, 2011 required Great Plains Natural Gas Company (Great Plains or the Company) to begin submitting annual service quality reports in May 2011. Subsequent orders revised and updated the reporting requirements.

The Commission established a Natural Gas Service Quality Working Group (NGWG) in Docket No. G002, G022, G004, G011, G008/CI-22-548 to develop and refine future reporting requirements for natural gas utilities. The [Order](#) in this docket adopted the NGWG's recommendations and authorized the Executive Secretary to establish a comprehensive list of current gas service quality reporting requirements which all gas utilities shall work from in future reporting. This list was documented in the February 2, 2024 [Notice of Gas Service Quality Reporting Requirements](#).

Great Plains filed its 2023 annual service quality report (Report) on May 1, 2024.

The Commission issued a Notice of Comment Period on May 15, 2024.

II. SUMMARY OF REPORT AND DEPARTMENT ANALYSIS

The Department reviewed Great Plains' 2023 Report to assess compliance with the reporting requirements established by the Commission. The Department used information from past annual reports to facilitate identification of issues and trends regarding Great Plains' performance.

The Department provides responses to the Commission's questions and a summary of the Department's review of Great Plains' 2023 Report.

A. RESPONSE TO COMMISSION QUESTIONS

1. *Should the Commission accept CenterPoint, GMG, Great Plains, MERC, and Xcel Energy's 2023 Annual Gas Service Quality Reports?*

Based on its review of Great Plains' 2023 *Annual Natural Gas Service Quality Report*, the Department recommends the Commission accept the 2023 Report.

2. *Are there other issues or concerns related to this matter?*

The Department also recommends that the Commission find that Great Plains has completed their excess flow valve (EFV) and manual shut-off valve outreach pursuant to the Commission's July 31, 2019 Order in Docket No. G999/CI-18-41.

B. *REPORT ANALYSIS*

As referenced in the introduction, the reporting requirements are summarized in the February 2, 2024 [Notice of Gas Service Quality Reporting Requirements](#) in Docket No. G004/CI-22-548 along with references to the original Commission orders establishing the requirements. The January 18, 2011 [Order](#) in Docket No. G999/CI-09-409 set many of Great Plains' initial reporting requirements, in alignment with the electric utilities' reporting requirements as documented in Minnesota Rules 7826. The Department includes links to those rules where referenced by the Commission's orders regarding reporting requirements for gas utilities.

1. *Call Center Response Time*

The Orders in Docket Nos. G999/CI-09-409¹ and G004/M-11-363² established the reporting requirements for natural gas providers' call center response time. Gas utilities are required to report the percent of calls answered within 20 seconds and the average time to answer an incoming call. The call center response time requirements were designed based on [Minnesota Rules 7826.1200](#) for electric utilities which states that utilities shall answer 80% of calls during business hours within 20 seconds.

¹ The Docket No. G999/CI-09-409, [Order dated January 18, 2011](#) established the initial reporting requirements for Great Plains and Greater Minnesota Gas.

² Docket No. G004/M-11-363 [Order dated March 6, 2012](#).

Table 1: Call Center Response Times for Great Plains³

Year	Avg Answer Speed (Seconds)	# of calls	12 Mo. Avg
2014	18	30,466	88%
2015	12	25,810	83%
2016	12	21,924	83%
2017	19	27,924	85%
2018	13	22,979	86%
2019	3	23,805	82%
2020	4	21,281	84%
2021	6	28,349	97%
2022	10	43,978	97%
2023	8	44,118	98%
10-Year Average	11	29,032	88%

Table 1 above shows that Great Plains has consistently answered greater than 80% of its calls within 20 seconds. Great Plains reported a significant call volume increase in 2022, which the Company explained was the result of the new ability to track Interactive Voice Response (IVR) calls starting in mid-January 2022.⁴ The 2023 call volume was comparable to the 2022 call volume.

Through a Department Information Request (IR) response, the Company provided the 2022 and 2023 figures for IVR and agent-handled calls. In both 2022 and 2023, 47% of the reported calls were IVR calls. When excluding IVR calls, 96% of calls were answered within 20 seconds in 2023.⁵

The Department concludes that the Company met the service quality standard and reporting requirements for call center data.

2. *Meter Reading Performance* ([Minn R. 7826.1400](#))

The following information is required for reporting on meter-reading performance by customer class for each month:

- A. The number and percentage of customer meters read by utility personnel;
- B. The number and percentage of customer meters self-read by customers;
- C. The number and percentage of customer meters that have not been read by utility personnel for periods of six to 12 months and for period of longer than 12 months, and an explanation as to why they have not been read; and
- D. Data on monthly meter-reading staffing levels, by work center or geographical area.

³ Petition, page 1 and Schedule 1.

⁴ Docket No. G004/M-23-78 [Initial Filing](#), page 1.

⁵ Department Attachment 1 (Company response to Department IR 1).

Great Plains provided detailed meter-reading information, including information on its monthly meter-reading staffing levels. Table 2 summarizes Great Plains’ meter-reading statistics.

Table 2: Meter-Reading Performance 2014 – 2023⁶

	Percent Read by Company	Percent Read by Customer	Average Number of Meter Reading Personnel
2014	99.91%	0.09%	10
2015	99.86%	0.07%	6
2016	99.97%	0.00%	3
2017	99.98%	0.00%	3
2018	99.98%	0.00%	3
2019	99.98%	0.00%	3
2020	99.99%	0.00%	3
2021	99.99%	0.00%	3
2022	99.98%	0.00%	3
2023	99.98%	0.00%	3
10-Year Average	99.96%	0.02%	4

All Great Plains’ meters are equipped with automated meter reading (AMR), and 99.98% of reads in 2023 were done via the AMR system. The remaining 0.02% of meter reads were estimated by the system, primarily when no meter data was retrievable by the fixed network system or handheld device.⁷ The Company has not had any meters not read for a period of six months or greater in the last ten years.

Meter-reading staffing was stable in 2023, with two meter-readers in the north geographical area, and one in the south.

The Department concludes the Company met the meter reading reporting requirements for 2023.

3. *Involuntary Service Disconnection Data* ([Minn R. 7826.1500](#))

The Docket No. G999/CI-09-409 Order required the Company to provide the involuntary disconnections data it reports under Minn. Stat. § 216B.091 and § 216B.096 (Cold Weather Rule reports) with its annual service quality report.⁸ Table 3 summarizes Great Plains’ residential customer disconnection statistics:

⁶ Petition, page 1 and Schedule 2.

⁷ Petition, page 1.

⁸ Per the Order in Docket No. G999/CI-09-409, Annual Service Quality Reports include the CWR data on involuntary service disconnections that the Company submits via Dockets E,G999/PR-YY-02 where YY references the last two digits of the year being reported (e.g. G999/PR-22-02 for 2022).

Table 3: Residential Customer Involuntary Disconnect Information⁹

	Received Disconnect Notice	CWR Protection			Disconnected Involuntarily	Restored within 24 Hours		Restored by Entering Payment Plan
		Sought	Granted	% Granted		Count	%	
2014	18,711	10	10	100%	1,227	34 ¹⁰	2.77%	10
2015	8,432	18	18	100%	819	0	0%	18
2016	9,732	12	12	100%	649	0	0%	12
2017	9,375	16	16	100%	743	0	0%	16
2018	9,491	18	18	100%	836	0	0%	18
2019	9,337	43	43	100%	862	0	0%	43
2020 ¹¹	1,755	0	0	NA	0	0	NA	0
2021	2,831	14	14	100%	407	26	6.39%	16
2022	4,571	21	21	100%	481	48	8.26%	18
2023	4,215	19	19	100%	672	43	6.40%	43
10-Yr Avg	7,845	17	17	100%	680	15	2.38%	19

In 2023, the Company sent 4,215 disconnection notices and disconnected 672 residential customers for non-payment. Great Plains has consistently granted 100% of cold weather rule protection requests. In response to a Department IR, the Company indicated that in 2023 31% of disconnections were reconnected within 60 days in 2023: 6.4% within 24 hours, 14.9% in 2- 30 days, and 9.7% in 31 – 60 days.¹²

The Company had unusually high disconnect notices and involuntary disconnections in 2014. If 2014 is excluded, then 2023’s number of involuntary disconnects (672) exceeds the recent average (619 for 2015 – 2023). There was a disconnection moratorium during the early part of the COVID-19 pandemic, which led to the lower-than-average disconnection figures in 2020 and 2021. The increase in disconnections in 2021 and 2022 was anticipated as utilities began disconnecting customers again, but the Department will continue to monitor this figure in future reports.

The Department concludes that the Company provided the required reporting for involuntary disconnections.

⁹ Petition, page 2 and Schedule 3 and Department Attachment 2 (Company response to Department IR 2 including a partial update to Schedule 3). Historic data on number of customers restored within 24 hours and restored by entering a payment plan retrieved from the Department Attachment 2.

¹⁰ Department Attachment 3 (email response from the Company including a revised response to Department IR 2).

¹¹ Note that there was a disconnection moratorium in place from March 2020 – August 2021 (during the early part of the COVID-19 pandemic). See Docket E, G999/CI-20-375.

¹² Department Attachment 4 (Company Response to Department IR 3).

4. *Service Extension Requests* ([Minn. R. 7826.1600](#))

The following information is required for reporting on service extension request response times by customer class and calendar month:

- A. The number of customers requesting service to a location not previously served by the utility and the intervals between 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; and
- B. 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 intervals between 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.

Additionally, utilities also shall report the types of extension requests, such as requests for reconnection after disconnection from nonpayment, for locations previously served and not previously served.

Table 4 below summarizes Great Plains' 2023 service extension request data for new service extensions requests.

Table 4: 2023 New Service Extension Requests¹³

	Residential		Commercial	
	# of Installations	Avg Days to Complete	# of Installations	Avg Days to Complete
2014 – 2018 Avg	121	27.2	29	29.1
2019 – 2023 Avg	100	47.2	23	46.2
2023 Actual	73	54.8	25	65.2

For new service extensions to locations not previously served, the Company has been taking an increasing number of days to complete the extensions while the number of installations has decreased over the last ten years. The Company stated that it does not track the date the property is ready for the service installation, so the report reflects the time from completion of the service line installation to the date the meter was installed upon request from the customer. Great Plains stated that the lag time from service line install to meter install is dependent on the customer making the request, and once requested, meters are typically set within 1-2 days of the request.¹⁴ The Company has not been able to identify any specific cause for the increase in the number of days to complete new service extension requests, nor has there been any changes to how the Company tracks the timing of new service extensions.¹⁵

¹³ Petition, Schedule 4.

¹⁴ Petition, page 2.

¹⁵ Department Attachment 3 (email response from the Company).

For renewed service extensions to locations previously served, the Company has consistently taken an average of approximately 1 day to complete the extension for both residential and commercial customers. In 2023, there were 655 residential and 120 commercial service extensions for locations previously served, which is down from the ten-year average of 1,081 residential and 191 commercial extensions. Great Plains' service extension data provided in Schedule 4 excludes reconnection of service to customers disconnected by the Company for non-payment of service.¹⁶

The Department concludes the Company met the service extension request reporting requirements in 2023.

5. *Customer Deposits*

The reporting requirements for customer deposits were updated by the [Order](#) in Docket No. G004/CI-22-548.

Great Plains does not require a deposit as a condition of receiving new service in 2023. The Company did not provide deposit collection policy updates or policy change rationale as the Company stated that there was no change to this policy in 2023. The Company did not require deposits in the last ten years.¹⁷

The Department concludes the Company met the customer deposit reporting requirement for 2023.

6. *Customer Complaints* ([Minn. R. 7826.2000](#))

The gas utility reporting requirements for customer complaints are as described in Minnesota Rules [7826.2000](#) and [7820.0500](#). The reporting on customer complaints must include the following information by customer class and calendar month:

- A. The number of complaints received;
- B. The number and percentage of complaints alleging billing errors, inaccurate metering, wrongful disconnection, high bills, inadequate service, and the number involving service-extension intervals, service-restoration intervals, and any other identifiable subject matter involved in 5% or more of customer complaints;
- C. The number and percentage of complaints resolved upon initial inquiry, within 10 days, and longer than 10 days;
- D. The number and percentage of complaints resolved by taking: the action the customer requested, a mutually agreed upon compromise, providing the customer with information that demonstrates the grieved situation is not within the utility's control, or refusing to take the action requested by the customer; and
- E. The number of complaints forwarded to the utility by the Commission's Consumer Affairs Office (CAO) for further investigation and action.

¹⁶ Petition, page 2.

¹⁷ Petition, page 3.

Additionally, utilities are required to provide the information noted in Minnesota Rules 7820.0500 which Great Plains provided in Schedule 6, pages 7-8 of its Petition.

Great Plains has provided data on customer complaints that were escalated to a supervisor for resolution in addition to a breakdown of all calls (by category and resolution) in Schedule 6. The Department provides a summary of Great Plains’ escalated customer complaint data below.

Table 5a: Escalated Customer Complaints for Great Plains (2014 – 2023)¹⁸

Year	Number of Complaints	# Forwarded by CAO	% Same Day Resolution	% Resolved by Taking Customer-Requested Action	Top Complaint	
					Category ¹⁹	%
2014	21	2	86%	0%	Service Restoration Intervals	29%
2015	28	0	96%	4%	Billing Error	29%
2016	10	0	100%	0%	Billing Error	30%
2017	16	0	75%	0%	Billing Error & Payment Arrangements (tie)	25% each
2018	22	1	91%	0%	Wrongful Disconnection	41%
2019	28	1	89%	4%	Wrongful Disconnection	36%
2020	8	0	100%	0%	Billing Error	63%
2021	12	3	100%	8%	Service Restoration Intervals	42%
2022	8	4	100%	25%	Wrongful Disconnection	38%
2023	25	2	100%	16%	Billing Error	32%
10-Year Average	18	1	97.9%	10.6%		

The number of escalated complaints has fluctuated year-over-year without a clear trend, but in 2023 the Company had 25 escalated complaints, including two which were forwarded by the Commission’s CAO. Both figures are higher than the ten-year average. The top category for escalated complaints in 2023 was billing error which was followed by other (28%), and a tie between wrongful disconnection and inadequate service (12% each).

All escalated complaints were resolved the same day they were escalated, with 16% resolved by taking the customer-requested action. Historically, most complaints (61.8% 10-year average) have been resolved by demonstrating that the company doesn’t have control of the situation, and this was also the most common resolution in 2023 (44%).

¹⁸ Petition, Schedule 6 pages 1-4.

¹⁹ Table 5a excludes “Other” as the top complaint category in favor of the top descriptive complaint category. “Other” was the top complaint category in 2014 (tie), 2015 (tie), and 2017.

Table 5b: Customer Calls by Complaint Category and Resolution Method for Great Plains (2014 – 2023)²⁰

Year	Total Calls ²¹	Calls for Detailed Categories ²²	Top Detailed Categories		Action	
			Billing Error	Inadequate Service	Agree	No Control
2014	32,775	2,309	65%	0%	33%	52%
2015	25,810	10,945 ²³	61%	7%	24%	61%
2016	21,924	10,056	60%	2%	25%	66%
2017	27,614	8,970	58%	3%	21%	71%
2018	22,979	12,252	57%	7%	21%	49%
2019	23,805	13,060	62%	8%	28%	52%
2020	21,281	10,291	78%	9%	33%	53%
2021	28,349	7,165	66%	13%	31%	50%
2022	43,978	5,284	63%	18%	35%	50%
2023	44,118	7,654	68%	17%	30%	51%
5-Year Avg	32,306	8,691	67.4%	12.9%	31.3%	51.3%

In 2023, Great Plains received a ten-year high of 44,118 calls, 7,654 of which were for the complaint categories detailed in [Minnesota Rules 7826.2000](#). Billing error has consistently been the top call complaint category, and in recent years, this has been followed by inadequate service. Consistent with the five-year average, in 2023 30% of complaint calls were resolved by agreeing with the customer and 51% were resolved by demonstrating that the Company did not have control over the issue.

The Department concludes Great Plains has met the customer complaint reporting requirements for 2023.

7. Gas Emergency Phone Line Answer Time

The Company is required to report its answer times to the utility’s gas emergency phone line. Great Plains also provided its total number of gas emergency calls and the ratio of calls answered within 20 seconds, as summarized in Table 6 below.

²⁰ Petition, Schedule 6 pages 5-6.

²¹ The Company expanded its IVR call tracking capability in 2022 to include both customer specific inquiries and general information requests (Petition, Schedule 6 page 5 of 8).

²² The “Detailed Categories” include those that Great Plains provided the resolution: Billing Error, High Bills, Inaccurate Metering, Wrongful Disconnection, Inadequate Service, Service Extension, and Service Request. The Total Call Count includes these categories in addition to: Emergency, Payment Arrangements, Start/Stop Service, Call Backs, IVR calls, and Other.

²³ The 2015 Detailed Calls only include the following categories: Billing Error, High Bills, Service Extension, and Service Request. The Service Extension calls included here are the 105 which included details on the action taken. The additional Service Extension calls reported without resolution details are included in the total call count.

Table 6: Gas Emergency Phone Calls Received by Great Plains²⁴

Year	Number of Gas Emergency Calls	Avg Seconds Before Call was Answered	% Answered in 20 Seconds or Less
2014	1,702	19	79%
2015	1,397	15	81%
2016	1,007	12	82%
2017	898	16	86%
2018	612	10	89%
2019	808	11	82%
2020	458	20 ²⁵	81%
2021	506	6	85.4%
2022	616	7	83.6%
2023	581	5	92.3%
5-Year Avg	594	10	84.9%

January was the lowest performing month for average answer time of the gas emergency phone line in 2023 at 14 seconds.²⁶ All other months in the year had an average answer time of four or five seconds. Great Plains’ number of gas emergency calls has declined over the last ten years while the Company has improved its average answer time, especially in the last three years.²⁷

The Department concludes the Company has met the gas emergency phone call reporting requirements for 2023.

8. Gas Emergency Response Times

In compliance with the Commission Order in Docket No G999/CI-09-409, Great Plains reports information on its response time to gas emergencies. Utilities are required to report on the percentage of emergencies responded to within one hour and within more than one hour. The response time is calculated from when Great Plains is first notified of the emergency and the time that a qualified emergency response person arrives at the incident location and begins to make the area safe. Great Plains also provided its average response time.

²⁴ Petition, Schedule 10.

²⁵ This figure reflects a Company update received in response to Department IR 4 in Docket No. G004/M-21-300. This update is included as an attachment to the [Department Comments](#) in Docket No. G004/M-21-300 (PDF pages 32-33).

²⁶ Petition, Schedule 10.

²⁷ The Docket No. G004/M-21-300 Department Comments, Company Response to Department IR 4 (PDF page 32 of 35) noted that starting in January 2021, a dedicated team of agents began answering Great Plains’ calls. Prior to this time, Call Center agents were handling calls for both Montana-Dakota Utilities Co. and Great Plains.

Table 7: Gas Emergency Response Time for Great Plains²⁸

Year	Number of Emergency Calls Requiring Response	% Calls Responded to in <u>Less than</u> One Hour	% Calls Responded to in <u>More than</u> One Hour	Average Response Time (Minutes)
2014	159	94%	6%	20
2015	174	99%	1%	15
2016	95	95%	5%	23
2017	376	98%	2%	22
2018	456	97%	3%	22
2019	538	98%	2%	20
2020	378	98%	2%	20
2021	441	98%	2%	19
2022	480	97%	3%	24
2023	424	97%	3%	23
10-Year Avg	352	97%	3%	21

As shown in Table 7, Great Plains has consistently responded to the vast majority of gas emergency calls in less than an hour. In 2023, Great Plains responded to 97% of emergency calls within one hour (matching the ten-year average), and the Company had an average response time of 23 minutes. Twelve (or 3% of) calls’ response time exceeded one hour in 2023. Nine of those were after-hours calls, and three were due to travel distance.²⁹

The total number of gas emergency calls requiring response has increased over the last ten years. There was an average of 252 calls per year from 2014 – 2018 and an average of 452 calls from 2019 – 2023. The Company explained that Great Plains implemented a policy change in 2017 to begin reporting all emergency calls; however in prior years the Company only reported emergency calls that were for jurisdictional leaks.³⁰

The Department concludes the Company met the gas emergency response reporting requirements for 2023.

²⁸ Petition, Schedule 7.

²⁹ Petition, page 4.

³⁰ Department Attachment 5 (Company Response to Department IR 7).

9. *Excavation Damages*

As a result of the NGWG’s recommendations and the Commission’s order in Docket No. G004/CI-22-547, excavation damage reporting criteria as described below replaces the prior mislocate and system damage reporting requirements that had been ordered in Docket No. G999/CI-09-409. All gas utilities are required to report the following metrics:

- A. The number of excavation tickets received;
- B. The number of excavation damages;
- C. The number of excavation damagers per 1,000 excavation tickets; and
- D. The number of at fault damages.

Table 8: Great Plains Excavation Damages³¹

Year	Number of Excavation Tickets	Number of Excavation Damages	Damages per 1,000 Tickets	% at Fault Damages
2014	7,397	38	5.14	13%
2015	8,287	48	5.79	23%
2016	11,858	38	3.20	21%
2017	7,626	34	4.46	38%
2018	7,893	28	3.55	50%
2019	7,794	31	3.98	23%
2020	9,148	21	2.30	19%
2021	8,928	33	3.70	33%
2022	7,562	39	5.16	31%
2023	8,144	40	4.91	23%
10-Year Avg	8,464	35	4.22	27%

Great Plains also provided its quarterly Minnesota Office of Pipeline Safety (MnOps) Quarterly Utility Damage Surveys for 2023 including the root causes of excavation-related damages. Damage incidents in 2023 included the following categories:

³¹ Petition, Schedule 8.

Table 8a: Root Cause of Excavation Damage (2023)³²

Root Cause	Incident Count
Failed to Maintain Clearance	12
Failed to Determine Precise Location	5
Failed to Protect and Support During Excavation	5
Incorrect Records or Maps	5
Expired Notification	4
Mis-Marked	4
Excavation Outside Request	2
Failed to Maintain Marks	2
Notification Not Made (no locate ticket)	1
Total	40

Great Plains has been including the quarterly MnOps surveys with its Annual Service Quality Reports since 2020, and the breakout of cause of incidents is consistent with recent years. Failed to maintain clearance, failed to determine precise location, and incorrect records or maps are the three most common root causes of excavation damage from 2020 – 2023.

The Department concludes the Company met the excavation damage reporting requirements for 2023.

10. Service Interruptions

Great Plains is required to report the number of service interruptions categorized by whether it was caused by the utility’s employees or contractors or whether it was due to any unplanned causes.³³

³² Petition, Schedule 8, pages 2 – 9. [Minnesota Statutes § 216D](#) and [Minnesota Rules 7560](#) define excavator and utility responsibilities.

³³ First ordered for Great Plains in the January 18, 2011 [Order](#) in Docket No. G999/CI-09-409.

Table 9: Service Interruptions for Great Plains³⁴

Year	Number of Interruptions			Total Number of Customers Affected	Average Duration (Minutes)
	Total Outages	% Caused by Great Plains	% Caused by Others		
2014	29	10%	90%	123	330
2015	34	26%	74%	250	551
2016	38	16%	84%	213	236
2017	30	40%	60%	146	180
2018	19	42%	58%	252	166
2019	18	33%	67%	355	187
2020	12	25%	75%	216	151
2021	28	29%	71%	236	165 ³⁵
2022	35	29%	71%	127	146
2023	30	30%	70%	163	147
10-Year Avg	27	28%	72%	208	226

Service interruptions have fluctuated year to year, but 2023’s figures are in line with the Company’s historic performance. The number of outages is 30 in 2023, which is above the ten-year average of 27 but down from 2022. Great Plains’ employees or contractors caused 30% of the interruptions in 2023 with the remainder caused by others. The average duration was up by one minute from 2022 but remains below the ten-year average (226 minutes) and five-year average (159 minutes for 2019 – 2023).

The Department concludes the Company met the service interruption reporting requirements for 2023.

11. Major Incident & MnOps Reporting

Great Plains had three incidents reportable to MnOps in 2023, and one of these incidents resulted in a violation letter. The incident that resulted in a violation letter was due to failure to accurately locate a gas line for the reportable event.³⁶

The Company’s five- year average (2019 – 2023) is one reportable incident per year and 0.6 violation letters per year.

³⁴ Petition, Schedule 9.

³⁵ The Average Duration in 2021 was updated from the value reported in the Department’s Comments in Docket No. G004/M-23-78 based on review of the Petition’s Schedule 10 in the same docket.

³⁶ Petition, pages 7-8.

i. Major Incident Reporting & MnOps Emergency Response Violations

Great Plains had three incidents that were reportable to MnOps in 2023, two of which resulted in service interruption. A summary of the incidents is included below.

Table 10: Great Plains’ Reportable Incidents³⁷

Date	Location	Number of Customers Affected	Duration (hours)	Issue Summary
February 24	Belview	-	-	A gas meter was cleared of snow and small leak tightened. The school self-evacuated and called the fire department as a safety measure.
July 31	Marshall	16	4	A retired tap on a main was hit. Excavator was aware that there was not a valid locate ticket prior to excavation. Traffic was re-routed and service interrupted.
November 9	Marshall	1	5	A contractor reported line damage during direction drill installation of fiber optic cable. The building was evacuated, traffic rerouted, and service interrupted.

The Company had a five-year average of one reportable incident per year, so 2023 reflects an increase from the average.

ii. MnOps Violation Letters

The Company received one MnOps violation letter in 2023, for the November 9 incident. In this incident, it was found that the contractor did not follow the Company’s Operations and Maintenance manual or Minnesota Statute by not marking within 2 feet of the utility. The locate request should have been reported as a non-locate (due to poor locate signal) which would have prompted additional verification of the line’s location.³⁸

From 2018 to 2023, 2021 is the only other year that Great Plains received MnOps violation letters (two).

The Department concludes that the Company met the required major incident, MnOps emergency response violation, and MnOps violation letter reporting requirements for 2023.

³⁷ Petition, pages 7-8.

³⁸ Petition, page 8.

12. *Integrity Management Plan Reporting*

The Company included its United States Department of Transportation, Pipeline and Hazardous Materials Safety Administration (PHMSA) Gas Distribution System Annual Report for 2023 as Attachment A to its Annual Report as required. The Department has reviewed this report and provides a summary below. The integrity management plan reporting is recent, so there is limited historic data to provide as a comparison, but where available, the Department provides these figures.

Table 11: Leaks Eliminated/Repaired³⁹

	Main Leaks		Service Leaks	
	5-Year Average (2019 - 2023)	2023	5-Year Average (2019 - 2023)	2023
All Leak Total	21	16	142	120
Hazardous Leak Count	Not Available	14	Not Available	38
% of Leaks that were Hazardous	Not Available	87.5%	Not Available	31.67%
Leaks Per 1,000 Miles of Main or 1,000 Services	45.32	33.54	3.41	5.16

In 2023, Great Plains reported fewer main and service leaks than the five-year average. The leaks per 1,000 miles of main or 1,000 services is also down in 2023 compared to the five-year average. The Company began reporting hazardous leak data in 2023. The majority of both main and service leaks were related to excavation damage.

In 2023, Great Plains had 477.09 miles of distribution mains; this is up from the five-year average of 468.42 miles. The Company also reported a modest increase in services, 23,259 in 2023 compared to a five-year average of 23,164.⁴⁰

The Department concludes that the Company provided the required integrity management plan reporting.

13. *Excess Flow Valves (EFVs) and Manual Shut-Off Valves*

Great Plains includes an update on EFV and manual shut-off valve installations in the Petition’s Schedule 12.

In addition to the installation update, the [Notice of Gas Service Quality Reporting Requirements](#) states that Great Plains is required to confirm with the Commission that they have completed their EFV and

³⁹ Data in Table 11 comes from Petition, Schedule 11 and Attachment A, and Department Attachment 6 (Company Response to Department IR 8).

⁴⁰ Ibid.

manual shut-off valve outreach pursuant to the Commission’s July 31, 2019 [Order](#) in Docket No. G999/CI-18-41; however, the February 23, 2021 [Order](#) in Docket No. G999/CI-18-41 acknowledged that Great Plains had completed by its July 27, 2020 reply comments.

i. EFV & Manual Shut Off Installation Updates

Tables 12a and 12b below summarize the Company’s update on EFV and manual shut-off valve installations.

Table 12a: EFV Installation Data (2023)⁴¹

Customer Class	Number of Customers Suitable for EFV	Number of Installed EFVs	Percentage of Suitable Customers with EFVs	Number of Customers Unsuitable for EFV
Residential	18,580	7,512	40.4%	18
Firm General	2,706	675	24.9%	50
Small Interruptible	104	8	7.7%	45
Large Interruptible	7	-	0.0%	6
Small Interruptible Transportation	6	-	0.0%	2
Large Interruptible Transportation	10	-	0.0%	7
Total	21,413	8,195	38.3%	128

In 2022, Great Plains reported 7,903 installed EFVs, so 2023 reflects an increase of 292 EFVs, 262 were for residential customers and 30 for firm general customers. The percentage of suitable customers with EFVs increased from 37.0% in 2022 to 38.3% in 2023.

⁴¹ Petition, Schedule 12.

Table 12b: Manual Shut-Off Valve Data (2023)⁴²

Customer Class	Number of Customers Suitable for Shut-off Valve	Number of Installed Shut-off Valves	Percentage of Suitable Customers with Shut-off Valves
Residential	18	18	100.0%
Firm General	50	43	86.0%
Small Interruptible	45	26	57.8%
Large Interruptible	6	4	66.7%
Small Interruptible Transportation	2	3	150.0%
Large Interruptible Transportation	7	1	14.3%
Total	128	95	74.2%

Great Plains increased the number of installed manual shut-off valves by five in 2023. The percentage of suitable customers with manual shut-off valves increased from 70.3% in 2022 to 74.2% for 2023.

The Department concludes the Company has met its reporting requirements for Excess Flow Valves and Manual Shut-Off Valves in 2023.

ii. Outreach Efforts

The Department believes that Great Plains has satisfied the outreach reporting requirement; however, since the Company provided an update, the Department reviewed and provides a summary of the Company’s outreach efforts below.

In compliance with the July 31, 2019 [Order](#) in Docket No. G999/CI-18-41, Great Plains also provided an update on the EFV outreach reporting requirements initially established by the August 20, 2018 [Order](#) in the same docket.⁴³

Order paragraph 7a: *Identify customers within its service territory that do not already have EFVs (and are eligible under the Federal standards) or manual shut-off valves and are not within an area the utility plans to upgrade by 2025.*

At the time of the Company’s December 18, 2018 Compliance Filing – Progress Report, the Company reported 331 customers within its service territory meeting the Commission’s customer type criteria who did not already have EFVs or manual shut-off valves.

⁴² Petition, Schedule 12.

⁴³ Great Plains is required to report on the items outlined in in the August 20, 2018 Order, order points 7a – 7c through the 2025 reporting period.

The Company stated three of the customers identified in 2018 have since installed an EFV or manual shut-off valve,⁴⁴ leaving 328 customers fitting the Commission’s criteria at the end of 2023 who did not have EFVs or manual shut-off valves as summarized in Table 12c below.

**Table 12c: Eligible Customers without EFV or Manual Shut-off Valves
(2023)⁴⁵**

Customer Type	Customer Count
K-12 public and non-public schools	35
Public and private universities and colleges	10
Hospitals	28
Multi-unit residential and nursing facilities	255
Total	328

Order paragraph 7b: *For the customers identified above, file a plan to have face-to-face meetings regarding the purpose of EFV and manual service line shut-off valves, along with the utility’s installation policy, and estimated costs.*

Order paragraph 7c: *The utility may propose another method for limiting the visits to non-public schools, universities and colleges, and multi-unit residential and nursing facilities based on a size metric. The utility may propose as part of the plan a recovery mechanism for the additional requirements of this order.*

To reach out to the identified customers, the Company emphasized mailings and a limited number of face-to-face meetings. The Company mailed letters to the 331 identified customers on May 28, 2019 and sent follow-up letters to those customers identified as not receiving the initial letter on July 23, 2019 and August 21, 2019. Great Plains received 64 calls from customers in response to the mailings and three customers came into the Company’s office for face-to-face meetings during 2019. The Company has continued to include an annual bill insert and has information related to EFVs posted on the Company’s website.⁴⁶

The Department concludes that Great Plains has provided the required update on EFV and manual shut-off valve installations. Additionally, the Department concludes that Great Plains has completed their EFV and manual shut-off valve outreach pursuant to the Commission’s July 31, 2019 Order in Docket No. G999/CI-18-41.

⁴⁴ Department Attachment 7 (Company Response to Department IR 9).

⁴⁵ Petition, page 7.

⁴⁶ Department Attachment 7 (Company Response to Department IR 9).

14. *Web-Based Metrics*

Gas utilities will be required to report web-based metrics beginning in 2025, for reporting year 2024. Great Plains did not include this information in the 2023 Report.

III. DEPARTMENT RECOMMENDATIONS

Based on its review of Great Plains' *2023 Annual Natural Gas Service Quality Report*, the Department recommends the Commission accept the 2023 Report.

The Department also recommends that the Commission find that Great Plains has completed their EFV and manual shut-off valve outreach pursuant to the Commission's July 31, 2019 Order in Docket No. G999/CI-18-41.



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G004/M-24-32

Requested From: Travis Jacobson, Great Plains Natural Gas Co.

Type of Inquiry: General

Nonpublic Public

Date of Request: 7/16/2024

Response Due: 7/26/2024

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Mary Beth Kehrwald

Email Address(es): marybeth.kehrwald@state.mn.us

Phone Number(s): 651-539-1808

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 1
Topic: Call Center Response Times
Reference(s): Schedule 1

Request:

The 2022 report noted that Great Plains began including IVR calls in the Call Center Response Time reporting. If available, provide the following call center response times for 2022 and 2023:

- A. Total call count, excluding calls handled by IVR.
- B. Number and percent of calls handled by agents that were answered within 20 seconds.
- C. Average answer time for calls handled by agents.

Response:

In January 2022, the Company expanded its IVR call tracking capability to include all IVR calls, whereas previously total call counts only included the number of IVR calls related to specific customer account information and not general inquiries.

- A. Call counts as reported in Schedule 6 of the Company's 2022 and 2023 Gas Service Quality Reports:

	2023	2022
All other calls	23,560	23,519
IVR		
Customer Acct Inquiry	9,894	10,233
Non-Authenticated	10,664	10,226
Total IVR Calls	20,558	20,459
Total Great Plains Calls	44,118	43,978

- B. In 2022, 21,987 calls were answered by agents within 20 seconds or 93%. In 2023, 22,604 calls were answered by agents within 20 seconds or 96%.
- C. The average speed of answer included on Schedule 1 is reflective of calls handled by agents. In 2022, the average speed was 10 seconds and in 2023 was 8 seconds.

To be completed by responder

Response Date: July 26, 2024
Response by: Travis Jacobson
Email Address: travis.jacobson@mdu.com
Phone Number: (701) 222-7855



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G004/M-24-32

Requested From: Travis Jacobson, Great Plains Natural Gas Co.

Type of Inquiry: General

Nonpublic Public

Date of Request: 7/16/2024

Response Due: 7/26/2024

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Mary Beth Kehrwald

Email Address(es): marybeth.kehrwald@state.mn.us

Phone Number(s): 651-539-1808

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 2
Topic: Involuntary Disconnections
Reference(s): Petition, Schedule 3 page 4 of 7

Request:

- A. Please provide the following data for 2014:
 - a. Total Residential Customers;
 - b. The number of residential customers who were involuntarily disconnected and had service restored within 24 hours;
 - c. The number of disconnected customers restored to service by entering into a payment plan in 2014.

- B. Per Schedule 3, page 4 of 7, from 2015 – 2020 no customers were reconnected by entering into a payment plan.
 - a. How do customers learn about/negotiate a payment plan with Great Plains?
 - b. Was this an option for customers prior to 2020?

Response:

- A.
 - a. Total residential customers for 2014 – 18,428.
 - b. In 2014, the Company only tracked the number of customers that had service restored within 24 hours during the Cold Weather Rule months. The Company did not disconnect any customers during the Cold Weather Rule months in 2014 so there would have been no customers reconnected within 24 hours.
 - c. In 2014, 10 customers had service restored by entering into a payment plan.
- B. Great Plains uses a variety of communication methods to educate customers on the opportunity to establish payment terms. Communication methods include bill inserts, email reminders for customers opting to receive email, winter collection letters and the Company's customer service representatives. Customers also have the following resources available for entering into payment arrangements:

To be completed by responder

Response Date: July 26, 2024

Response by: Travis Jacobson

Email Address: travis.jacobson@mdu.com

Phone Number: (701) 222-7855



- Online - After logging into their online account, customers can self-service a payment plan on eligible accounts by selecting from a number of available schedule options in order to design a plan that works best for them.
- Automated Phone System (IVR) - Customers calling the GPNG customer service line can self-service eligible accounts through the automated system by selecting from a number of available schedule options.
- Customer Call - If the self-service option is not available on the account or if the customer prefers, customer service representatives are available from 7:30 a.m. to 6:30 p.m. CST Monday through Friday to discuss payment arrangement options. Also, credit & collection representatives attempt an agent-led manual call on every broken pay arrangement as well as accounts at risk for disconnection. Customers with eligible accounts can enter into reasonable payment arrangements at any time prior to disconnection.
- Live Chat - customer support representatives are available to live chat with a customer through the GPNG website to discuss payment plan options.

Payment plans were an option prior to 2020. Please see the attached Revised Schedule 3 page 4 for updated 2015 – 2020 data for the Number of Customers Restored with Payment Plans.

To be completed by responder

Response Date: July 26, 2024
Response by: Travis Jacobson
Email Address: travis.jacobson@mdu.com
Phone Number: (701) 222-7855

Great Plains Natural Gas Co.
2023 Gas Service Quality Annual Report
Schedule 3 - Involuntary Service Disconnections
December Residential Customer Status Reports

All Utilities														
	Utility	Total Res. Customers	Total Residential Customer Disconnects	# LIHEAP Customers	# LIHEAP Disconnects	Disconnect Rate (%), Total Residential	Disconnect Rate (%), LIHEAP	# Customers Restored within 24 hours	# Customers Restored with Payment Plan	# Customers Disconnected 30+ days	# Customers Seeking CWR Protection	# Customers Granted CWR Protection	# Customers Requesting Medical Acct Status	# Customers Granted Medical Acct Status
2015	Great Plains	18,502	819	1,596	184	4%	12%	0	18	89	18	18	n/a	n/a
2016	Great Plains	18,628	649	1,509	158	3%	10%	0	12	133	12	12	n/a	n/a
2017	Great Plains	18,556	743	1,549	169	4%	11%	0	16	100	16	15	n/a	n/a
2018	Great Plains	18,657	836	1,566	196	4%	13%	0	18	176	18	18	n/a	n/a
2019	Great Plains	18,723	862	1,869	183	5%	10%	0	43	212	43	43	n/a	n/a
2020	Great Plains	19,277	-	1,413	-	-	-	0	0	40	-	-	n/a	n/a
2021	Great Plains	19,338	407	898	0	2%	0	26	16	129	14	14	n/a	n/a
2022	Great Plains	19,362	581	1,941	91	3%	5%	48	18	166	21	21	n/a	n/a
2023														
beyond														

IR 2 – Involuntary Disconnections – Reconnection Timing

In response to Department IR 2 in docket no. 24-32, the Company indicated that in 2014 the Company only tracked the number of customers that had service restored within 24 hours during the CWR months. Has this practice changed? If so, when did it change? From 2014 – 2023, the Company only reported customers with service restored within 24 hours in 2022 and 2023.

Response:

Attached is an update to Information Response 2.

IR 5 – Service Extension Requests for New Service Locations

The response provided does not address why the average days to complete new service extensions has increased over the last ten years (doubled from the 2014-2018 five-year average to the 2023 actual data). Please provide a supplemental response addressing why this period has been increasing and not if the way that Great Plains tracks the timing of new service extensions has changed.

Response:

At this time, the Company has not been able to identify any specific cause for the increase in the number of days, nor has there been any changes to how Great Plains tracks the timing of new service extensions. The Company works with each customer to have their service line installed within the requesting customer's timeframe. A meter is then installed within a day or two of the customer's call requesting the meter install.

IR 7 – Gas Emergency Response Times

Can you please clarify if the data provided (after 2017) is limited to the Minnesota jurisdiction?

Response:

Yes, the information provided is limited to the Minnesota jurisdiction.



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G004/M-24-32

Requested From: Travis Jacobson, Great Plains Natural Gas Co.

Type of Inquiry: General

Nonpublic Public

Date of Request: 7/16/2024

Response Due: 7/26/2024

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Mary Beth Kehrwald

Email Address(es): marybeth.kehrwald@state.mn.us

Phone Number(s): 651-539-1808

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 2
Topic: Involuntary Disconnections
Reference(s): Petition, Schedule 3 page 4 of 7

Request:

- A. Please provide the following data for 2014:
 - a. Total Residential Customers;
 - b. The number of residential customers who were involuntarily disconnected and had service restored within 24 hours;
 - c. The number of disconnected customers restored to service by entering into a payment plan in 2014.

- B. Per Schedule 3, page 4 of 7, from 2015 – 2020 no customers were reconnected by entering into a payment plan.
 - a. How do customers learn about/negotiate a payment plan with Great Plains?
 - b. Was this an option for customers prior to 2020?

Response:

- A.
 - a. Total residential customers for 2014 – 18,428.
 - b. In 2014, the Company only tracked the number of customers that had service restored within 24 hours during the Cold Weather Rule months. The Company did not disconnect any customers during the Cold Weather Rule months in 2014 so there would have been no customers reconnected within 24 hours.
 - c. In 2014, 10 customers had service restored by entering into a payment plan.
- B. Great Plains uses a variety of communication methods to educate customers on the opportunity to establish payment terms. Communication methods include bill inserts, email reminders for customers opting to receive email, winter collection letters and the Company's customer service representatives. Customers also have the following resources available for entering into payment arrangements:

To be completed by responder

Response Date: August 5, 2024

Response by: Travis Jacobson

Email Address: travis.jacobson@mdu.com

Phone Number: (701) 222-7855



- Online - After logging into their online account, customers can self-service a payment plan on eligible accounts by selecting from a number of available schedule options in order to design a plan that works best for them.
- Automated Phone System (IVR) - Customers calling the GPNG customer service line can self-service eligible accounts through the automated system by selecting from a number of available schedule options.
- Customer Call - If the self-service option is not available on the account or if the customer prefers, customer service representatives are available from 7:30 a.m. to 6:30 p.m. CST Monday through Friday to discuss payment arrangement options. Also, credit & collection representatives attempt an agent-led manual call on every broken pay arrangement as well as accounts at risk for disconnection. Customers with eligible accounts can enter into reasonable payment arrangements at any time prior to disconnection.
- Live Chat - customer support representatives are available to live chat with a customer through the GPNG website to discuss payment plan options.

Payment plans were an option prior to 2020. Please see the attached Revised Schedule 3 page 4 for updated 2015 – 2020 data for the Number of Customers Restored with Payment Plans.

Revised Response:

- A. b. In 2014, the Company only tracked select data surrounding disconnections and reconnections during the Cold Weather Rule (CWR) months as requested in the Minnesota Cold Weather Rule Questionnaire. Per the Company's 2014 CWR reports, 1,227 customers were involuntarily disconnected with 34 of those customers being disconnected during the CWR months. All 34 were reconnected within 24 hours.

The Company expanded the reporting of data surrounding disconnections and reconnections with the introduction of the Residential Customer Status Reports. The information reported in the former CWR reports surrounding disconnections and reconnections continues to be reported in the Residential Customer Status Reports as shown on Schedule 3 pages 1 and 2, but has also expanded to now include additional information such as the number of residential customers restored to service within 24 hours for all months, which is not required under Statutes 216B.091 and 216B.096 as the column header is not highlighted in light green.

To be completed by responder

Response Date: August 5, 2024
Response by: Travis Jacobson
Email Address: travis.jacobson@mdu.com
Phone Number: (701) 222-7855



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G004/M-24-32

Requested From: Travis Jacobson, Great Plains Natural Gas Co.

Type of Inquiry: General

Nonpublic Public

Date of Request: 7/16/2024

Response Due: 7/26/2024

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Mary Beth Kehrwald

Email Address(es): marybeth.kehrwald@state.mn.us

Phone Number(s): 651-539-1808

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 3
Topic: Involuntary Disconnections - length
Reference(s): No specific reference

Request:

What is the average length of residential customer disconnect from:

- A. Disconnection; and
- B. Customer request to reconnect.

Response:

The Company does not readily track the requested information. However, in looking at the information provided in Schedule 3, page 1, the following can be determined:

Customers	
Disconnected	Reconnected
672	Total # of Residential Customers Involuntarily Disconnected
629	43 # of Customers Restored within 24 hours
529	100 # Reconnected within 2-30 days
464	65 # Reconnected within 31-60 days

Once a disconnected customer calls into reconnect their service, the reconnect typically occurs within one business day of the customer's request.

To be completed by responder

Response Date: July 26, 2024

Response by: Travis Jacobson

Email Address: travis.jacobson@mdu.com

Phone Number: (701) 222-7855



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G004/M-24-32

Requested From: Travis Jacobson, Great Plains Natural Gas Co.

Type of Inquiry: General

Nonpublic Public

Date of Request: 7/16/2024

Response Due: 7/26/2024

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Mary Beth Kehrwald

Email Address(es): marybeth.kehrwald@state.mn.us

Phone Number(s): 651-539-1808

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 7
Topic: Gas Emergency Response Times
Reference(s): Schedule 7

Request:

Gas emergency calls requiring response have been trending up in recent years as shown in the table below.

Gas Emergency Calls Requiring a Response

	Calls
2014 – 2018 Five-Year Avg	252
2019 – 2023 Five-Year Avg	452
2023 Actual	424

To what does the Company attribute this increase?

Response:

In 2017, Great Plains implemented a policy change where the Company now reports all emergency calls. In previous years, the Company only reported emergency calls that were for jurisdictional leaks.

To be completed by responder

Response Date: July 26, 2024
Response by: Travis Jacobson
Email Address: travis.jacobson@mdu.com
Phone Number: (701) 222-7855



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G004/M-24-32

Requested From: Travis Jacobson, Great Plains Natural Gas Co.

Type of Inquiry: General

Nonpublic Public

Date of Request: 7/16/2024

Response Due: 7/26/2024

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Mary Beth Kehrwald

Email Address(es): marybeth.kehrwald@state.mn.us

Phone Number(s): 651-539-1808

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 8
Topic: Distribution System Plan Performance Measures
Reference(s): Schedule 11

Request:

If available, please provide the following:

- Miles of Distribution Main for the years ending: 2019, 2020, 2021, and 2022
- Number of Services for the years ending: 2019, 2020, 2021, and 2022

Response:

Please see the table below for the miles of distribution main and the number of services for the years 2019, 2020, 2021, and 2022.

	Miles of Distribution Main	Number of Services
2019	469	23,146
2020	465	23,100
2021	464	23,134
2022	466	23,179

To be completed by responder

Response Date: July 26, 2024

Response by: Travis Jacobson

Email Address: travis.jacobson@mdu.com

Phone Number: (701) 222-7855



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G004/M-24-32

Requested From: Travis Jacobson, Great Plains Natural Gas Co.

Type of Inquiry: General

Nonpublic Public

Date of Request: 7/16/2024

Response Due: 7/26/2024

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Mary Beth Kehrwald

Email Address(es): marybeth.kehrwald@state.mn.us

Phone Number(s): 651-539-1808

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 9
Topic: EFV Outreach
Reference(s): Petition, page 8, Docket No. G999/CI 18-41 Order dated August 20, 2018

Request:

In the December 18, 2018 [Compliance Filing – Progress Report](#) in Docket No. G999/CI-18-41, Great Plains stated that it planned to complete face-to-face meetings with the 331 customers identified under the August 20, 2018 Order, order point 7a by the end of the fourth quarter of 2019.

- A. Please confirm when face-to-face meetings with the identified customers occurred.
- B. Please describe any ongoing EFV and manual shut-off valve installation outreach to these customers beyond the bill inserts described on Petition, page 7.
- C. Has the utility tracked how many of its customers identified above have had EFV or manual shut-off valves installed? If so, please provide those figures.

Response:

- A. Great Plains mailed letters to the 331 identified customers on May 28, 2019, with follow up letters sent to those customers identified as not receiving the initial letter on July 23, 2019 and August 21, 2019. The Company received 64 calls from customers in response to the mailings. Three customers came into the Company's office for face-to-face meetings during 2019.
- B. Great Plains believes it has fulfilled the requirements outlined in the Docket No. G999/CI-18-41 Order dated August 20, 2018 and continues to inform customers through an annual bill insert and information related to EFVs posted the Company's website. No additional outreach has been made.
- C. Yes, three customers have installed an EFV or manual shutoff from the 331 customers originally submitted. One customer was from the K-12 public and non-public school group in 2020 and in 2023, one customer was from the hospital group and the other was from the multi-unit residential and nursing facilities.

To be completed by responder

Response Date: July 26, 2024

Response by: Travis Jacobson

Email Address: travis.jacobson@mdu.com

Phone Number: (701) 222-7855

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
Comments**

Docket No. G004/M-24-32

Dated this 16th day of **September 2024**

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_24-32_M-24-32
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_24-32_M-24-32
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St Bismarck, ND 58501	Electronic Service	No	OFF_SL_24-32_M-24-32
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_24-32_M-24-32
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_24-32_M-24-32
Caitlin	Straabe	caitlin.straabe@mdu.com	Great Plains Natural Gas Co.	400 N 4th St Bismarck, ND 58501	Electronic Service	No	OFF_SL_24-32_M-24-32