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June 26, 2013

Burl W. Haar
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, Division of Energy Resources**
Docket No. G004/M-13-366

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

2012 Annual Service Quality Report (Report) submitted by Great Plains Natural Gas Company, a Division of MDU Resources Group, Inc. (Great Plains or Company).

The *2012 Annual Service Quality Report* was filed on May 1, 2013 by:

Tamie Aberle
Director of Regulatory Affairs
Great Plains Natural Gas Company
P.O. Box 176
Fergus Falls, Minnesota 56538-0176

Based on its review of Great Plains' *2012 Annual Service Quality Report*, the Department recommends that the Commission **accept** the Company's Report pending Great Plains' response to various inquiries in *Reply Comments*. The Department's recommendations are listed at the conclusion of its *Comments*.

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

Sincerely,

/s/ LAURA BETH LAUFMANN
Rates Analyst
651-296-8663

LBL/ja
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET NO. G004/M-13-366

I. BACKGROUND

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 Resources¹ (Department) and all Minnesota regulated natural gas utilities in Docket No. G999/CI-09-409 (09-409 Docket). Various rounds of comments and discussion occurred in the 09-409 Docket and the issues came before the Commission on August 5, 2010. During the August 5, 2010 Commission Meeting, Great Plains Natural Gas Company (Great Plains or Company) argued that, given its size relative to larger Minnesota gas utilities, the Company's reporting requirements should be modified from those required of other gas utilities.

In an August 31, 2010 *Compliance Filing*, Great Plains provided additional information attempting to support its position that its size required different reporting requirements.

In its January 18, 2011 *Order—Setting Reporting Requirements* in the 09-409 Docket (09-409 *Order*), the Commission determined that Great Plains' size was not a barrier to complying with the reporting requirements and required that Great Plains provide service quality information in generally the same manner as other Minnesota gas utilities.

On May 2, 2011, Great Plains filed its calendar year 2010 *Annual Service Quality Report* in Docket No. G004/M-11-363. The Company filed its calendar year 2011 *Annual Service Quality Report* in Docket No. G004/M-12-442 on May 1, 2012.

¹ At the time when the Commission opened this investigation, the Department was referred to as the Minnesota Office of Energy Security, or OES.

The Company filed its 2012 *Annual Service Quality Report* (Report) on May 1, 2013.

The Department notes that Ordering Point 11 of the Commission's *Order* in Docket No. G004/M-11-363, et. al. states:

The parties shall convene a workgroup to work on improving consistency in reporting and to address the issues described herein.

This workgroup met on June 22, 2012.² The output of that workgroup was incorporated in the utilities' 2012 annual service quality reports filed May 1, 2013 (or, to a limited extent, the 2013 reports that will be filed in 2014)³. Reporting changes as a result of the workgroup consensus are noted in the analysis below.

On May 1, 2013, the Company filed its calendar year 2012 *Annual Service Quality Report* (Report). This is the third annual Report filed by Great Plains.

The Department provides its analysis of Great Plains' Report below.

II. THE DEPARTMENT'S ANALYSIS

In its 09-409 *Order*, the Commission allowed Great Plains to delay providing certain information regarding various service quality metrics until January 1, 2011. As such, this Report marks the second full calendar year for which the Company has provided data for all of the Commission's service quality reporting metrics. Great Plains did provide data for certain reporting requirements in its calendar year 2010 service quality report; for those metrics, a multi-year comparison can be made. The Department discusses each reporting requirement separately below.

A. CALL CENTER RESPONSE TIME

The Commission required Great Plains to provide in its annual service quality report call center response time in terms of the percentage of calls answered within 20 seconds. This requirement applies beginning with the Company's second (calendar year 2011) service quality report. The Department notes that Minnesota Rules, part 7826.1200 requires Minnesota's electric utilities to answer 80 percent of calls made to the business office during regular business hours within 20 seconds.

² Participating in the workgroup were Xcel Energy, CenterPoint Energy, Minnesota Energy Resources Corporation, Great Plains, Interstate Power and Light, and the Department.

³ See Attachments 1 and 2 for a matrix summarizing each utility's reporting content for each metric and a workgroup agenda.

In its Report, Great Plains provided the required information on a monthly basis for 2012. The information provided indicates that Great Plains was able to answer 80%, or more, of calls within 20 seconds in 11 of the 12 months reported.⁴ In the month in which the percentage of calls answered in 20 seconds or less fell below 80%, Great Plains received 34,098 calls, 28% more calls than the average amount (26,704) received in the other 11 months of 2012. The percentage of calls answered in less than 20 seconds (81.6%) was over 1.5% higher in 2012 than it was in 2011 and 0.5% higher than it was in 2010. The Department concludes that Great Plains has met the level of service set by Minnesota Rules, part 7826.1200.

In its March 6, 2012 *Order—Accepting Reports and Setting Further Reporting Requirements*, the Commission required all natural gas utilities to report average speed-of-answering calls. The Company provided average speed at which phone calls were answered for each month of 2012. In 2012 the average speed of answer was 13 seconds. Average speed of answer in 2011 was 35 seconds. This metric was not reported in the 2010 Report. Average speed-of-answer decreased by over 20 seconds from 2011 to 2012. The Department recognizes this improvement and will continue to monitor this metric in future reports.

B. METER READING PERFORMANCE

In its 09-409 *Order*, the Commission required Great Plains to report meter reading performance data in the same manner as prescribed in Minnesota Rule 7826.1400. The Company provided, as an attachment to its Report, the meter reading performance data per Minnesota Rules. Because the 2012 Report is only the second report in which meter reading performance data has been provided the Department's analysis of this metric is limited.

The Company reported an average number of active meters on the system as 21,506 in 2012 and 21,375 in 2011. In 2012 the Company was able to read 21,477 meters, or 99.86 percent of total system meters. This is an increase over the number of meters read in 2011 (21,356) but a decrease in percentage of meters read (99.92% of meters were Company read in 2011). The percentage of meters read in 2011 and 2012 are not substantially different and approach one hundred percent; thus the Department concludes that the Company's performance in this area is adequate.

Great Plains reported no meters unread in more than six months for all of calendar year 2012. Meter reading staffing levels increased from 7 in 2011 to 8 in 2012. The Department will continue to monitor these metrics.

⁴ In October 79.13 percent of calls were answered in 20 seconds or less.

C. INVOLUNTARY SERVICE DISCONNECTIONS

The Commission's 09-409 *Order* requires Great Plains to provide involuntary service disconnection data in the same manner that it reports these data under Minnesota Statutes §§ 216B.091 and 216B.096 which relate to the Cold Weather Rule. The Company reported 1,093 involuntary disconnects in 2012, a decrease from the 1,293 involuntary disconnects reported in 2011. The Department will continue to monitor this metric.

According to Great Plains' Report, disconnection levels were higher in the spring and summer of calendar year 2012 and reached their peak during the spring of 2012 (roughly coinciding with the end of the Cold Weather Rule period).

The Company's Report indicated that the number of past due residential accounts averaged nearly 25 percent of total residential accounts and exceeded 40 percent of total accounts in the first five months of 2012. These figures indicate an increase from 2011,⁵ when an average of 18 percent of accounts were past due, and in only four months was the percentage of past due accounts above 20 percent of the total. While Great Plains is not expected to know what specific challenges may be preventing prompt payment, the Department requests that the Company provide, in *Reply Comments*, any observations from Great Plains' perspective that may account for the large percentage of past due accounts in the first five months of 2012.

D. SERVICE EXTENSION REQUESTS

In its 09-409 *Order*, the Commission required that each utility provide in its annual report service extension request information in the same manner as described in Minnesota Rule 7826.1600, items A and B, except for information already provided in Minnesota Statutes §§ 216B.091 and 216B.096, subd. 11. The Company provided, as an attachment to its Report, the service extension request data per Minnesota Rules. The Department notes that this is the second annual service quality Report where Great Plains has provided these data.

The Company provided two sets of data in its Report, the first reflects service extensions to new meters, and the second reflects service extensions to existing meters. In terms of the first group of data, Great Plains had a total of 121 residential new service extension requests and 45 commercial new service extension requests in 2012. On average⁶, it took Great Plains 21 days to extend service to these residential customers and 25 days to extend service to these commercial customers. In 2011 Great Plains received 107 new residential meter service extension requests and 32 new commercial meter extension requests, which were completed in an average of 29 days. Great Plains explained that the number of days represents the time from receipt of the service line application to the date the meter was installed. In its *Reply Comments*

⁵ The data quoted here is the corrected data that Great Plains submitted in their *Reply Comments* filed in Docket No. G004/M-12-442.

⁶ weighted average

filed in Docket No. G004/M-12-442, the Company indicated that the time to extend new service appears long because the requested service date may occur before the structure is ready to receive natural gas service. The Department commends Great Plains on its decrease in service extension intervals from 2011 to 2012 even as new service extension requests increased in 2012. In terms of the second set of data, Great Plains had a total of 1,047 residential existing meter service extension requests and 679 commercial existing meter service extension requests in 2012 (1,716 combined). The average number of days to complete these requests was one day for both residential and commercial requests. This represents a slight decrease in total number of existing extension requests⁷ from the 1,857 reported in 2011 and identical interval times (1 day in both years). A portion of this decrease may result from the fact that in 2011 the Company included in the data locations that had been disconnected for non-payment, a subset of the data that was excluded from the 2012 data.

The Department has noted no definitive changes or trends in the two years of available service extension data, especially given the limited data currently available. The Department will continue to monitor these data in future annual service quality reports and will make any necessary recommendations or conclusions when sufficient data are available.

E. CUSTOMER DEPOSITS

The Commission required each natural gas utility to provide in its annual service quality report data on the number of customers required to make a deposit as a provision of receiving service. This is the second service quality report that Great Plains has provided these data. The Company did not require a deposit as a condition of service for any customers during 2012 or 2011.

F. CUSTOMER COMPLAINTS

The Commission's 09-409 *Order* requires Minnesota natural gas utilities to provide customer complaint data in the same manner as prescribed in Minnesota Rule 7826.2000. The Company provided, as an attachment to its Report, these customer complaint data per Minnesota Rules. The Department notes that this is the second year that the Company has provided these data in its service quality reports. The Department further notes that Great Plains's reported customer complaint data includes only those complaints escalated to a supervisor. Through participation in the workgroup, Great Plains agreed to include, starting with its 2013 report, all calls received in the customer service center determined to be indicative of a complaint (which is expected to be the majority of all calls).

In terms of total complaints, Great Plains reported 16 during calendar year 2012, 9 more than the 7 complaints reported for 2011.

⁷ Commercial and residential existing meter extension requests were combined in the 2011 report.

The Company also provided data on the amount of time needed to resolve complaints and whether they were forwarded from another party, such as the Commission's Consumer Affairs Office (CAO). Great Plains reported that no complaints were received from the CAO in 2012, while one CAO complaint was received in 2011. All 16 calendar year 2012 complaints reported by Great Plains were resolved immediately, while 6 of the 7 complaints received in 2011 were resolved immediately.

The Company reported that 10 of the 16 complaints received in 2012 (63 percent) were either resolved through compromise with the customer or by agreeing to the customer suggested action. This compares with 4 out of 7 (57 percent) complaints that were resolved by compromise or by taking the customer suggested action as reported in the 2011 Report.

The Department is pleased to note the improvements in the percentages of complaints resolved both quickly and in a manner acceptable to the customer as reported by the Company in the 2012 Report. Since this is only the second year that the Company has reported these data and the Company is in the process of modifying its complaint monitoring and criteria, the Department will continue to monitor these data in future annual service quality reports and will make any necessary recommendations or conclusions when sufficient data is available.

G. EMERGENCY LINE ANSWER TIMES

In its January 18, 2011 Order in Docket 09-409, the Commission required Great Plains to provide information regarding its emergency line response time. In addition, the Commission required that Great Plains provide an explanation detailing the Company's expectations for answer times and the procedures employees follow for handling emergency calls. All the utilities participating in the Service Quality Reporting Workgroup agreed to provide their internal performance goal for answering gas emergency calls (x percent in x seconds).

In February of 2011, Great Plains started tracking the percentage of gas emergency calls answered within 20 seconds.⁸ Therefore, the 2012 Report marks the second year that the Company has provided these data. The Company also provided information regarding average answer speed and the total number of calls received by the emergency line.

On an annual basis, Great Plains was able to answer 83.75 percent of its emergency line calls within 20 seconds, which is above the prescribed 80 percent in 20 seconds standard for electric utilities and is an improvement over the 79.97% level reported for 2011. Further, Great Plains was able to answer at least 80 percent of gas emergency calls within 20 seconds in 9 of the 12 months of 2012, an improvement over the 6 months in which this goal was met in 2011. In the months where Great Plains was unable to meet the goal, it reported the following performance levels: February 79.17 percent, May 72.73 percent, and June 76.53 percent.

⁸ Prior to 2011, Great Plains tracked emergency line response times as the percentage of calls answered within 30 seconds.

In terms of average speed of answer, Great Plains reported an annual average of 13 seconds per call for 2012, an improvement over the 15 seconds per call reported for calendar year 2011. On a monthly basis, the Company did not report a month with average response times in excess of 20 seconds for either 2012 or 2011. The Department is encouraged by this performance and hopes that the Company can continue to maintain, or improve, its performance.

The Company did not provide a description of its internal emergency line answer time performance goals in the Report. The Department requests that Great Plains provide this information, as described in the summary of reporting requirements agreed to by the workgroup, in Reply Comments.

In terms of number of emergency calls, the Company reported 1,437 in calendar year 2012, a decrease from the 1,683 reported in 2011. Since this is the second year that these data has been provided, the Department will continue to monitor this metric in future reports for any patterns or changes.

H. MISLOCATES

The Commission's 09-409 *Order*, requires Minnesota natural gas utilities to provide data on mislocates, including the number of times a line is damaged due to a mismarked line or failure to mark a line. In its January 18, 2011 Order in Docket 09-409, the Commission required that Great Plains provide data on mislocates in the Company's annual service quality reports. Great Plains reported only 1 mislocate in 2012; the Company reported 6 mislocates in 2011 and 1 in 2010. Great Plains received 7,490 locate requests in 2012 for a total mislocate rate of 0.02 percent. Mislocate rates for 2011 and 2010 were 0.12 percent and 0.01 percent, respectively. The one mislocate reported in 2012 was due to Great Plains failing to mark the line. The Department will continue to monitor this metric in future annual service reports for emerging trends or patterns and provide additional commentary if needed.

I. DAMAGED GAS LINES

The Commission's 09-409 *Order* requires Minnesota regulated natural gas utilities to provide data on damaged gas lines, including the number of lines damaged by company employees or contractors, the total number of other damage events, and the number of events that were unplanned in nature. The Commission's January 18, 2011 Order in Docket 09-409 requires Great Plains to provide data on damaged gas lines in a manner similar to that provided by other utilities. The Department notes that this is the second service quality report where Great Plains has provided data in the manner prescribed by the Commission. Great Plains provided information regarding the total number of damage events in its 2010 *Annual Service Quality Report*, but did not classify each event by cause.

During the 2012 reporting period, Great Plains experienced 68 instances where its gas lines were damaged, which is an increase of 38 over the 30 incidences reported in 2010 and an increase of 52 over the incidences reported in 2010. Of the 68 damage events, 14, or 20 percent, were

caused by Great Plains or its contractors and the remaining 54 were caused by other events while 2, or 7 percent, of the 2011 damages were caused by Great Plains contractors or employees. In other words, from 2011 to 2012, the percentage of damages caused by Company employees and contractors nearly tripled.

The Company also provided detailed Minnesota Office of Pipeline Safety (MnOPS) reporting documents detailing why the events happened and what type of pipes were involved (i.e., transmission, distribution). In terms of pipeline type, damage on the Great Plains system was restricted to its distribution network during 2012. The majority of damage incidences (65) were related to two categories: damage done by non-power equipment (hand digging damage) (12) or failure to support and protect facility⁹ (53). The relatively large increase in damage events between 2011 and 2012, the apparent trend (with only three years' worth of data available, it is impossible to say conclusively whether a trend is actually present) of yearly increases in damage incidents, and the increase in damage events caused by the Company or its contractors, is concerning.

The Department requests that the Company explain, in *Reply Comments*, whether it believes the number of damage incidents reported in 2012 was at a reasonable level. The Department also requests that the Company address the increase in the percentage of damage incidents attributable to Great Plains, including its plans for minimizing these damage incidents going forward.

J. SERVICE INTERRUPTIONS

In its 09-409 *Order*, the Commission required that Minnesota regulated natural gas utilities collect data regarding service interruptions. The utilities are required to separate these data into categories based on whether the event was caused by utility employees, utility contractors, or some other unplanned causes. In its January 18, 2011 *Order* in Docket 09-409, the Commission required Great Plains to provide detailed information regarding service interruptions on the Company's system.

For 2012, Great Plains reported 48 service interruptions. There were 25 service interruptions reported in 2011.¹⁰ Of the 48 interruptions reported in 2012, 13 were caused by Great Plains, and all others were caused by other parties or causes. In 2011, 22 interruptions were caused by Great Plains workers or contractors, with the remainder caused by other causes. None of the service interruptions that occurred in 2012 were MnOPS reportable events.

⁹ In its *Reply Comments* in Docket No. G004/M-12-442 the Company explained that the cause category "failure to support and protect facility" is used in cases in which an excavator does not take due care in digging or working around the facilities after the facilities are exposed

¹⁰ Great Plains filed 2010 service interruption data, but explains in its *Reply Comments* in Docket No. G004/M-12-442 that this data only includes MnOPS reportable events and is not analogous to the data submitted in later Reports.

While the Department is somewhat concerned with the increase in service interruptions sustained in 2012 as compared to 2011, it is difficult to determine what a reasonable level of interruptions would be given that this metric has only been reported for two years. The Department, recognizing that service interruptions and line damages are often related, requests that Great Plains explain whether the service interruptions increase is tied to the increase in line damages, and, if it is not, provide an alternate explanation for the increase.

K. MNOPS REPORTABLE EVENTS

The 09-409 *Order* also required Great Plains to provide summaries of all major events that are immediately reportable to the Minnesota Office of Pipeline Safety (MnOPS) and provide contemporaneous reporting of these events to both the Commission and Department when they occur. Great Plains provided this information in at attachment to its Report.

The Company began providing this information starting with its calendar year 2010 *Annual Service Quality Report*, reporting 0 reportable events in 2010, 3 reportable events in 2011, and 0 reportable events in 2012. The Department commends Great Plains on its continued low levels of MnOPS reportable events and will continue to monitor this metric in future reports.

L. GAS EMERGENCY RESPONSE TIMES

In its 09-409 *Order*, the Commission required that Minnesota regulated natural gas utilities collect and provide data regarding gas emergency response times, including a percentage breakdown of the number of calls responded to in less than an hour and the percent of calls responded to in more than an hour. In its January 18, 2011 Order in Docket 09-409, the Commission required Great Plains to report information in a manner similar to that required for Minnesota Energy Resources Corporation and CenterPoint Energy and also provide copies of its MnOPS summary forms. Great Plains provided these data in an attachment to its Report. This is the second service quality report where the Company has provided this data.

Great Plains reported 367 gas emergencies, which is a decrease of 139 over the 506 emergencies reported in 2011 and a decrease of 215 over the 582 gas emergencies reported in 2010. In terms of response times, the Company was able to respond to all but 1 in less than one hour. This represents an improvement of 7 over the 8 emergencies not responded to in under an hour in 2011 and an improvement of 14 over the 22 emergencies that took more than an hour for response in 2010. The Department acknowledges both the continued improvement in response time between 2011 and 2012 and the decrease in emergencies from 2011 to 2012 and encourages the Company to continue to maintain or improve its response times in the future.

In terms of monthly data, the Department did not observe any months, or specific incidences, with unusually long response times. There was no month in 2012 in which average response time exceeded 20, a level that the Department encouraged the Company to aspire to in future reports in its *Comments* filed in response to the Company's 2011 *Annual Service Quality Report* filing.

M. CUSTOMER SERVICE RELATED OPERATIONS AND MAINTENANCE (O&M) EXPENSES

In its 09-409 *Order*, the Commission also required Great Plains to report operation and maintenance expenses related to customer service included in the Federal Energy Regulatory Commission (FERC) 901 and 903 accounts. The Company provided these data in an attachment to its Report. In 2012, Great Plains reported total service quality related O&M expenses of \$347,607, which represents a decrease of \$1,844 over the \$349,451 reported in 2011. On an average basis, the Company's 2012 O&M expenses were approximately \$28,967 per month. The Department did not observe any significant shifts in costs between months and notes that the change in expenses between 2010 and 2011 is small. As such, the Department does not have additional comments on this topic at this time, and will continue to monitor this metric in future service quality reports.

III. SUMMARY AND CONCLUSIONS

Based on its review of Great Plains' 2012 *Annual Service Quality Report*, the Department recommends that the Commission accept the Company's Report pending Great Plains' response to various inquiries in *Reply Comments*. The Department requests that the Company provide the following in its *Reply Comments*:

- a full explanation of why percentages of past due accounts in the first five months of 2012 exceeded 40 percent of total accounts;
- an explanation, as described in the summary of reporting requirements agreed to by the Natural Gas Service Quality Reporting Workgroup, of its internal performance goal for answering gas emergency calls;
- an explanation of whether it believes the number of damage incidents reported in 2012 was at a reasonable level, and address the increase in the percentage of damage incidents attributable to Great Plains, including its plans for minimizing these damage incidents going forward.
- if it believes the number of line damage incidents was higher than reasonable, a description of plans for minimizing damage incidents going forward;
- clarification of whether the increase in service interruptions is tied to the increase in line damages, and, if it is not, an alternate explanation for the rise.

Natural Gas Service Quality Reporting Workgroup
Reporting Summary and Changes

	Xcel Energy	CPE	MERC	IPL	GP
Call Center Answer Times	<p>Change: None. Already include IVR and billing calls.</p> <p>Our report includes E&G residential calls to our call center representatives, business solutions center calls to our repr, credit calls, and IVR handled outage and billing calls. We report monthly volume and percentages based on the 80/20 Rule. We report calls 24/7.</p>	<p>Change: EFF with 2012 report, will add Service Level with IVR to Schedule 1.</p> <p>Schedule 1: The percent of calls answered within 20 seconds or less during stated business hours, the average speed of answer and the total number of calls answered. Includes utility call center, emergency calls, and business customer hotline. ASA and total number of calls answered are reported as required in Docket G006/GR-04-801. Excludes calls that only utilized IVR functionality.</p>	<p>Change: EFF with 2012 report, will add IVR calls to the telephone response information.</p> <p>Our report includes monthly information for calls taken Monday through Friday, 8-5, the report includes average speed of answer and % of calls answered in 20 seconds or less. We also provide the similar information for calls coming into our emergency lines with the exception of the % answered in 15 seconds or less and is all calls taking 24/7. Does not include IVR calls.</p>	<p>Change: None. Already includes IVR and all calls.</p> <p>Percentage of calls answered within 20 seconds, including both gas and electric data. Includes all calls 24/7, including IVL.</p>	<p>Change: None. Already include IVR calls.</p> <p>Total calls answered, percentage of calls answered in 20 seconds or less, and the average speed of answer. Includes calls during business hours (7 am to 7 pm) and includes IVR calls.</p>
Customer Deposits	<p>We do include IVR handled outage and billing calls</p>	<p>We will add SL with the IVR included for Bill/Credit/Move (CIC - Residential) reporting to Schedule 1 beginning with January 2012.</p>	<p>MERC is able to include the number of IVR calls in the telephone response information.</p>	<p>Will continue to include</p>	<p>Will continue to include.</p>
Customer Complaints	<p>Our reported deposits are from residential customer that have filed for bankruptcy (both E&G)</p>	<p>Schedule 5: The number of move orders and the number and percentage of deposits required as a condition of service. Including deposits required for reconnection of service after disconnection due to credit issues.</p>	<p>Our report includes any deposits collected for the reporting year. We only collect from customers caught diverting (theft) service.</p>	<p>Deposit data is for new and recontacting customers, consisting of both gas and electric data.</p>	<p>Deposits required as a condition for receiving new service.</p>
Customer Complaints	<p>Change: EFF with 2012 report, submit in May 1 Complaint report.</p>	<p>Change: None. Already includes the May 1 Complaint report.</p>	<p>Change: None. Already includes the May 1 Complaint report.</p>	<p>Change: EFF with 2012 report, will include the May 1 Complaint Report.</p>	<p>Change: EFF with 2012 report, will include the May 1 Complaint Report. EFF with 2013 report, will include all calls received in the customer service center summarized by call type.</p>
Customer Complaints	<p>Customer advocate group, we report all complaints, source of complaint, type, and action we took and time to resolve - by month.</p> <p>Call center - all calls that came into call center by customer type, complaint type, and action we took. By month - both E&G</p>	<p>Schedule 6: Number of recorded residential and commercial complaints, reason type of complaint, action taken, time to resolve complaint and number of complaints received forwarded by outside agencies.</p>	<p>Our report categorizes complaints by the following types, employee action/behavior, billing/meter reading issue, collection/disconnection issue, service quality meter adjustment, outage, high bill. We then report time to resolve. This is broken into 3 categories, initially, within 10 days and > 10 days. We then report report complaint resolution by the following taking action as customer requested, agreeable compromise, not within the control of the utility and refuse customer request. We also indicate the # of PLC complaints. This is all reported on a monthly basis.</p>	<p>All customer complaints are tabulated. Data includes both gas and electric complaints.</p>	<p>Customer complaints that are escalated to a supervisor response. Complaints are reported by type, resolution timeframe, resolution type, and number forwarded by the MN CAC.</p>

Natural Gas Service Quality Reporting Workgroup
 Reporting Summary and Changes

Excel Energy	CPE	MERC	IPL	GP
<p>Customer advocates provide, we report all complaints, source of complaint, type, and action we took and time to resolve, by month</p> <p>Call center - we report specific call codes that we previously determined could be indicative of a complaint, this ends up being the majority of calls - we then report first call center calls by customer type, call type, and section we took. By month - both E&G</p>	<p>AWB/BPP Issue: Any Budget Billing issue, do not understand, too high or too low, question how calculated</p> <p>Billing Errors: Bill print issues, adopted contract account errors, Landlord Agreement error</p> <p>Construction & Maintenance: Excess footage fees, out of season charges, frost burners, cost to add change, reduce meter, cost to change pressure, meter location, ice shields, barriers, atmospheric corrosion inspection (ACI)</p> <p>Credit Arrangements: GAP, Cannot afford/cannot pay, reasonable on time, default management, CWR arrangement, recontract quote</p> <p>Disconnecter Non-Pay: GULM, Wrongful Disconnect, thought had arrangement, did not receive notice, disconnected during CWR, recontract fees, payment methods, scheduling requirements</p> <p>Disputed Charges: Any dispute not involving an account currently in write off, Error: Investigation Bad Debt, bad/deliver/resent disputes, fossilaceous, divorce, roommate situations, disputed debt transfer, basic fee on inactive meter, dates of service (move in or out)</p> <p>Employee: CSR Error, Employee Misconduct</p>	<p>MERC reports all calls which the call center CSR believe to be a complaint. MERC has trained the CSRs to record all complaints through an automated process. When the CSR first looks at any account there is a pop up window which asks if the call is a complaint. This question must be answered before the CSR moves on. MERC reports the total number of complaints, breaks down the complaints by 7 different types; this breakdown is given by total number and percentage of total complaints. MERC provides the total numbers that are resolved initially, within 10 days and greater than 10 days. Complaint resolution is reported by total number and percentage. The resolution categories include asking for information as customer requested, acceptable compromise, no action within the control of the utility and refuse to customer requested action. This report also indicates the number of P.L.C. complaints. This is informational only as those complaints are included in the reported complaint numbers.</p>	<p>Billing Errors - All billing complaints except high bills, low bills, zero usage/consumption, adjusted bills.</p> <p>Inaccurate Metering - Field/engineering/construction/maintenance issues, meter reading issues</p> <p>Wrongful Disconnects - Turn-off or disconnect error, collections issues.</p> <p>High Bills - High bills due to usage or weather, billing issues.</p> <p>Inadequate Service - Customer service issues such as poor service, long wait, delayed responses, lack of follow-up.</p> <p>New Service Connection Intervals - New service issues relating to field/engineering/construction/maintenance departments.</p> <p>Service Restoration Intervals - Outage issues relating to field/engineering/construction/maintenance departments.</p> <p>Payment Status - Late payment, incorrect payment amount, late payment fee, missing payment, promise to make payment, returned payment fee.</p> <p>Turn-on - Issues with turn-on order for service, wrong date, not complete, not issue correctly, lack of customer contact.</p> <p>Meter Reading/Other - Meter reading issues such as no read/schedule/this read, read cycle, reader access, reader behavior, read more cycle.</p> <p>Payment Arrangements - Payment agreements - short and long term, new defaults, multiple agreements, agreement displays, promise to pay.</p> <p>Credit & Collections General - Bankruptcy, collections agency/harassment issues, customer assistance programs.</p> <p>Property Damage - Report of damage to customer property/equipment, claims, insurance questions, leases, construction, line clearance, outages, weather.</p> <p>Tree Trimming - Issues with tree trimming - not notified, trimmed too much, trimmed too little, did not like way trimmed, trim cycle.</p> <p>Engineering, Construction, Maintenance Other - No call back, no response safety issue, outages, periodic meter change, advanced maintenance/usage, power quality, radio interference, power quality lights.</p> <p>Power Quality & Reliability - Outages, blinks, quality issues.</p> <p>Customer Payment Programs - Programs such as Automatic Payment, Payment Billing, Western Union, CheckFree, Budget Billing, Utility Assistance program.</p> <p>Non-Utility Billing - Bill details, Communication Tax, adder bill detail, disputes, sign, dispute responsibility, finance charges.</p> <p>General Billing Questions/General Other - All other.</p>	
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Provide description of what is being reported in the Complaint numbers.

Natural Gas Service Quality Reporting Workgroup
Reporting Summary and Changes

	Xcel Energy	CPE	MERC	IPL	GP
Provide description of what is being reported in the Complaint numbers (continued).		Security Deposit: Cannot afford, question calculation, not returned, interest Service Order Scheduling: Anything appointment related, wait time, appointment windows, scheduling policies, missed/late appointment Other: Legal Access, Postcard, Claims/Restoration, BP Verification, CTP, Marketing, Vehicle Operation Platopoint: Any complaint involving transfers part of the Platopoint initiative Decoupling/BB: Any complaint remaining to the Inverted Block Rate (meter pricing) and/or Decoupling			
Whether MERC should be required, in future annual reports, to further categorize the complaints included in the category "my bill is too high"	N/A	N/A	MERC is willing to look at trying to further categorize these type of complaints. It most cases these are customers who's perception is their bill may be too high based on various factors such as media reports of low gas costs (why does gas cost me \$7.00/Dth when the media is telling me it's only \$2.00?), weather impact, etc. In most cases it is CRRs taking time to explain what goes into a bill or that the weather wasn't actually as warm as the customer may think.	N/A	N/A
How MERC, in future annual reports, should report on escalated, informal complaints, including those received by the Commission's Consumer Affairs Office	N/A	N/A	MERC believes it is capturing all those complaints.	N/A	N/A
How Xcel, in future annual reports, should report on call center complaint resolution timeframes (Xcel did not include this information in its 2010 report).	The vast majority of our call center complaints/calls are resolved upon their initial inquiry. However, we are looking into capturing the timeframe for the small percent of remaining calls. While it seems redundant to file the same report in two different dockets, if it would be helpful to parties, we do not oppose. The reports are different- the annual customer complaint report under 7826.0500 details the numbers resolved/unresolved as well as total customer numbers. The info provided in our SQ reports under 7826.2009 doesn't provide this info, but breaks it down into categories, sources, by month, time resolved, action taken etc.	N/A	N/A	N/A	N/A
Whether utilities should be required to file copies of their annual customer service reports (required under Minn. Rules, part 7826.0500), whether those requirements overlap with the information provided in the annual gas service quality reports, and how these requirements compare and are reconciled.		Schedule 17: Currently including a copy of the report filed, as required in Docket No. G008 (GR-04-90).	This seems redundant and hopefully, this can be reviewed and determined that the gas service quality fulfills this requirement.		Copy of report will be provided.

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	Xcel Energy	CPE	MERC	IPL	GP
Meter Reading	<p>Change: Eff with 2012 report, all utilities will report MR reading levels by geographic location, whether MRs have other non-MR responsibilities, and whether AMR is deployed in each reported geographic area.</p> <p>Under 7636-1400 we report # and % of meters read by XE and customer by month. We report # and % of meters for 6-12 months and 12+ months, by month, and a description for why they haven't been read for all customer classes. We also report staffing levels by work center in accordance with the Rule.</p> <p>We also note that our reported numbers of meters read and estimate number 7636-1400 do not add to 100 percent because the Rule includes only the number of meters estimated for six or more consecutive months. Any meters estimated for a single month, up to a total of five months, are not included in the reported numbers.</p> <p>We report both E&G</p>	<p>Change: Eff with 2012 report, all utilities will report total meter readings. Also, all utilities will report MR reading levels by geographic location, whether MRs have other non-MR responsibilities, and whether AMR is deployed in each reported geographic area.</p> <p>Schedule 2: The number of residential, commercial and total number of meters to be read by month, the number of residential, commercial, total and percentage of meters read from actual meter readings by CPE personnel, the number of residential, commercial, total and percentage of meters read by customers, and the meter reading staffing levels for the metro area and greater Minnesota. The number of residential, commercial, total and percentage of meters not read within 6-12 months and greater than 13 months.</p>	<p>Change: Eff with 2012 report, all utilities will report MR reading levels by geographic location, whether MRs have other non-MR responsibilities, and whether AMR is deployed in each reported geographic area.</p> <p>MERC reports monthly total meters, meters company read and meters estimated or self-read. MERC is not able to differentiate between an estimate or a self-read. The percentages of company read and self-read is provided along with # and % of meters not read in a 6-12 month period and those not read > 12 months. Comments are also provided as to why meters were not read during those periods. Because of the number of farm tap customers MERC has we report both with and without farm taps included. Farm taps are required by company being required to read them once annually. MERC also provides meter reading staffing levels. MERC does not have dedicated meter readers in all areas of the State. MERC relies on labor reports and provides a FTE estimate based on hours spent reading meters.</p>	<p>Change: Eff with 2012 report, all utilities will report MR reading levels by geographic location, whether MRs have other non-MR responsibilities, and whether AMR is deployed in each reported geographic area.</p> <p>Meter reading performance by month including both gas and electric data.</p>	<p>Change: Eff with 2012 report, all utilities will report MR reading levels by geographic location, whether MRs have other non-MR responsibilities, and whether AMR is deployed in each reported geographic area.</p> <p>The number and percentage of meters read by utility personnel, self-read by customers, or estimated. Also the number and percentage of meters not read by utility personnel for periods of 6-12 months and longer than 12 months with description as to why. Also provide meter-reading staffing levels by area.</p>
Please describe how/what you report					
Whether the utilities' data on the number of unmetered meters and unexplained meter readings is consistent with the utilities' data on the number of estimated billings under Minn. Rules, part 7620.3400.	<p>The difference between the total number of meters and the number of meters read by the utility or its customers is the number of estimated meter readings due to an unmetered meter.</p> <p>Yes-we believe we are in compliance with the Rules.</p>				Yes.
Development of a more accurate and comparable method of reporting meter reading staffing levels and whether it is relevant for meter-reading staffing levels to be reported by work center or geographical area.	<p>We have an integrated meter reading workforce and AMR systems. We currently report by work center in compliance with Rule 7636-1400 in our alternate SQ report. We support maintaining this work center reporting consistent for both our gas & electric SQ reports.</p>	<p>Reported by geographic area, metro and greater MN.</p>			Currently reported by geographic area.
Are "specialty" / "redflag" reads included in reported Actual and Estimated meter read numbers?	No.	<p>On the 2011 report, the credits and rebills were included in the counts of actual bills and estimated bills. For 2012, special or rebill meter readings will not be included in the reported Actual and Estimated meter read numbers.</p>	No.		No.
Involuntary Service Disconnections	<p>Change: Eff with 2012 report, all utilities will include a summary modeled after the 2011 CPE summary of Cold Weather Rule reports.</p> <p>Consistent with Order point 2D of the 8/26/10 Order Docket No. G999/Ct-09-409, we reference the CWR docket but do not include any of the information in our gas report.</p> <p>This was addressed in the Commission's August 26, 2010 Order in Docket No. G999/Ct-09-409, but we do not oppose providing.</p>	<p>Change: None.</p> <p>Schedule 3: The month ending Minnesota Cold Rule Compliance Questionnaire in a column format by month with all months reported. (Copy: Xcel).</p>	<p>Change: Eff with 2012 report, all utilities will include a summary modeled after the 2011 CPE summary of Cold Weather Rule reports.</p> <p>MERC provides the monthly CWR Compliance Questionnaire that is filed monthly with the Commission.</p>	<p>Change: Eff with 2012 report, IPL will begin representing out the credit-related disconnects. Additionally, all utilities will include a summary modeled after the 2011 CPE summary of Cold Weather Rule reports.</p> <p>Included a copy of monthly Cold Weather Rule reports included in appendices.</p>	<p>Change: Eff with 2012 report, all utilities will include a summary modeled after the 2011 CPE summary of Cold Weather Rule reports.</p> <p>Number of customers who received disconnection notices, # that sought Cold Weather Rule protection, who were granted protection, and whose services were disconnected involuntarily (All data from Cold Weather monthly reports).</p>
Please describe how/what you report					
Whether to require utilities to include in their annual service quality reports copies of the information they submit under Minn. Stat. §§ 216B.09 and 216B.96 (and/or summaries of this information), and if so, in what format.	<p>This was addressed in the Commission's August 26, 2010 Order in Docket No. G999/Ct-09-409, but we do not oppose providing.</p>				
Separate out credit-related reconnections to report (just non-credit-related) if not, include the # of disconnections as a way to approximate just non-credit related disconnections.	N/A	N/A	N/A		N/A

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Service Extension Request Response Times	Change: None. Already excludes reconectors for non-payment. Connections to current customers are included in total connections.	Change: None. Already excludes reconectors for non-payment.	Change: None. Already excludes reconectors for non-payment.	Change: Eff with 2012 report, will exclude reconectors associated with non-payment.	Change: None. Already excludes reconectors for non-payment. Connections to current customers are included in total connections.
Please describe how/what you report	We report requests to service to new locations, both number of installations and average # of days to complete between request and completion by month. We do not report requests to locations previously served as the only people that we classify in this group are customers who have had their meter locked due to credit. We classify those reconectors for service upgrades or vacancy with our requests for new service - we classify them all together. This report is gas only.	Schedule 4: The number of commercial and residential service extensions, the average number of days to complete from the time the property is ready until installation in complete for new service request (properties where prior service did not exist) and Renewed service (properties where service previously existed) excluding locked meters related to credit issues.	This report includes monthly information for new service requests for both residential and commercial service installations. It indicates the # of requests and the average time between requested date and installation. The report also includes the same information for requests where an existing service exists and the meter has been turned off for reasons other than non-payment (gas and electric data).	Report includes monthly information for new service requests for residential and commercial service installations (gas only data). It indicates the # of requests and the average time between the requested date and installation. The report also includes the same information for requests where an existing service exists and the meter has been turned off for reasons other than non-payment (gas and electric data).	The number of extensions and average days to complete for New Service (locations not previously served) and Renewed Service (locations previously served).
Whether utilities should be required to report the number of requests for service to previously served locations and the time required to complete these requests	Aside from those customers who had their meter locked due to credit (which the Commission said not to include in their 8/26/10 Order) We do report this, we have not (and can not) break them out from the new customers - so our reporting combines them all into one group (both new and current customers).	Currently reporting, excluding locked meters related to credit issues.	This does seem like a waste of time. The reports have indicated that the utilities do a good job in getting service initiated in these instances. If delays were occurring on regular basis the Commission would be receiving complaints. I've seen nothing to indicate this has been an issue.	Provided in 2011 report.	GP provided data between receipt of service line application and date meter was installed. We do not have an efficient means of tracking days between requested meter installation date and actual install date. GP supports excluding this data from the reports - no substantial dependent.
Whether to exclude from the gas service quality reports the number of reconectors and restoration of service requests that were processed after a meter was locked for non-payment of a bill and which are also reported under Minn. Stat. § 216B.091 and 216B.106.	The Commission's August 26, 2012 Order in Docket No. G997/C1-09-409 said to not need to include this, so we have not.	Currently excluding.	Currently excluding.	Will exclude reconectors associated with non-payment.	Currently excluding.
Mis/locates	Change: Eff with 2012 reports, will follow the mislocate criteria provided by CPE.	Change: None.	Change: Eff with 2012 reports, will follow the mislocate criteria provided by CPE.	Change: Eff with 2012 report, will separate mismarked v. not marked items, will attempt to report mislocates using the CPE criteria, will provide gas-only mislocates.	Change: None. Reported in this fashion for 2011 report.
Please describe how/what you report	We define mislocates as a gas line that was damaged as a result of mismarking or failure to mark a line. We divide the number of mislocates by the number of locate tickets to get the mislocate rate. Yes, we can do this. It will be based on whether there was paint or not, which we understand is the same way CPE does it. Beginning in 2012 by a of a new rule, MNOPS requires reports only for damages that result in a leak - so our service quality reporting will report more than our MNOPS reports.	Schedule 8: The number of mislocates due to mismarked line, failure to mark a line, total number of mislocates, total number of locate tickets and number of mislocates per 1000 locate tickets.	MERC reports monthly total locates, # of mislocates and the % of mislocates. This report would only include those mislocates resulting in damage as MERC has no other consistent means of tracking this information.	Total locate requests for both gas and electric, including number of gas lines damaged due to mismarked or failure to mark.	The number of locate tickets requests received through the MN One Call system and the number of mislocates categorized as either due to a not marked line or a mis-marked line.
Whether to require MERC, Xcel, Interstate, and Great Plains to provide the same level of underlying detail on the total number of mislocates (the number of mismarked lines and the number of failures to mark a line) that CenterPoint provided in its 2010 report.	Yes, we can. If there are no visible marks/paint in the post locate pictures at the site of the damage CPE determines the root cause to be a failure to Mark.	N/A	With the very low number of mislocates I question the value of this information.	IPL will separate out mismarked vs. not marked in the 2012 report.	GP provided the split between lines not marked and mis-marked lines and will continue to do so.
Assess whether can follow the Mislocate criteria provided by CPE	Determines whether a line is mismarked or failed to be marked. CPE performs an investigation on all gas damage using post locate pictures taken by the locator to determine whether a line was properly marked or not marked in all. If there are marks/paint in the area of the damage but they are not within the 24 inch tolerance zone CPE determines the root cause of the damage to be a Mismark. If there are no visible marks/paint in the post locate pictures at the site of the damage CPE determines the root cause to be a failure to Mark.	N/A	MERC photographs all line locates prior to excavation. If damage occurs MERC will go back to the locate record (assuming a locate was requested) to verify if the locate was accurate. If it is determined the locate was accurate according to 216D the contractor will be billed. If it is determined MERC or its contractor mislocated the facility the information is then included in the mislocate report portion of the Service Quality report.		Great Plains investigates each damage to determine who is at fault either company or contractor/locator also determine if locates are off or not located at all. Results are documented, but we do not take pictures of locates at this time.
Separate out the electric mislocates to get gas-only?	N/A. Only reports natural gas mislocates.	N/A	N/A	In 2011, IPL had five (5) gas "mislocates/lines not marked" that resulted in damage to gas facilities. In 2012 report, will report gas-only mislocates.	N/A

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Gas System Damage	<p>Change: None. Order Pt. 5 of the Commission's Order 11, 2012 Order in Docket No. G999/AA-10-885 sets the requirements for reporting the lost gas implications associated with at-fault contractor main strikes.</p>	<p>Change: None. Order Pt. 5 of the Commission's Order 11, 2012 Order in Docket No. G999/AA-10-885 sets the requirements for reporting the lost gas implications associated with at-fault contractor main strikes.</p>	<p>Change: None. Order Pt. 5 of the Commission's Order 11, 2012 Order in Docket No. G999/AA-10-885 sets the requirements for reporting the lost gas implications associated with at-fault contractor main strikes.</p>	<p>Change: BIF with 2012 report, will report gas damage by month. Order Pt. 5 of the Commission's Order 11, 2012 Order in Docket No. G999/AA-10-885 sets the requirements for reporting the lost gas implications associated with at-fault contractor main strikes.</p>	<p>Change: Will continue to provide in future annual reports the detail requested. Order Pt. 5 of the Commission's Order 11, 2012 Order in Docket No. G999/AA-10-885 sets the requirements for reporting the lost gas implications associated with at-fault contractor main strikes.</p>
Please describe how/what you report	<p>We report gas line damages on a monthly basis classified by whether they were damaged by XE and our contractors or other causes. We then provide our miles of main and the damage calculated per 100 miles of main.</p>	<p>Schedule 9; Damages by CPE Employees/Contractors. Damages by others, total damages, miles of pipe, damages per 100 miles of pipe.</p>	<p>MERC reports on a monthly basis the total number of gas line damages and whether they were the fault of MERC or its contractors, damaged by others or a system integrity failure.</p>	<p>Number of gas system damages, including whether the damage was caused by those working on behalf of the utility and also what the damage is attributed to (power equipment, hand digging, steals, etc.)</p>	<p>The number of gas system damages, categorized as to whether the damage was caused by a GP employee/contractor or caused by any other unplanned cause. Also included is miles of pipe and damage per 100 miles of pipe calculation.</p>
Whether to require increase to report in future annual reports: Is gas damage data by month.	N/A	N/A	N/A	IPL will report gas damage by month in the 2012 report.	N/A
Whether to require Great Plains and Greater Minnesota Gas to include in future annual reports data on the type of party (third-party contractor, utility personnel, customer) who caused each particular damage event.	N/A	N/A	N/A	N/A	GP will provide the detail requested in the 2012 report.
How the utilities account for lost gas when there is an incident of any kind that results in lost gas who pays for the lost gas and who pays for the cost of repairing damaged lines when the damage is not caused by the company or its contractor, as well as when the damage is caused by the company.	<p>Lost gas reporting set in Docket No. G999/AA-10-885. Amounts received from contractor damage bills are an offset to O&M expenses.</p>	<p>Lost gas reporting set in Docket No. G999/AA-10-885. Contractors billed for cost of repairs. Amounts received from contractors is an offset to O&M expenses.</p>	<p>Lost gas reporting set in Docket No. G999/AA-10-885. All at-fault contractors are billed for damages. Amounts received are an offset to O&M expenses.</p>	<p>Lost gas reporting set in Docket No. G999/AA-10-885. Escrower is billed for cost of repairs. Amounts received are in offset to O&M expenses.</p>	<p>Lost gas reporting set in Docket No. G999/AA-10-885. All at-fault contractors are billed for damages. Amounts received are in offset to O&M expenses.</p>
Gas Service Interruptions	<p>Change: None.</p>	<p>Change: None.</p>	<p>Change: BIF with 2012 report, will provide calculated outage times.</p>	<p>Change: BIF with 2012 report, will provide calculated outage times.</p>	<p>Change: None.</p>
Please describe how/what you report	<p>We report gas service interruptions on a monthly basis classified by whether they were damaged by XE and our contractors or other causes. Within these categories we indicate the number of homes, the number of incidents, and the average outage time.</p>	<p>Schedule 10; Report outages due to CPE Employees/Contractors, outages due to others and total indicating the number of customer affected, number of outages, and the average duration of the outage. Also provide in Schedule 11 detail of MNODS reportable events and system integrity events.</p>	<p>MERC provides monthly information of total service interruptions, and whether they were caused by a MERC employee or contractor, others or system integrity. A monthly detailed report is also included indicating the duration of the interruption.</p>	<p>Reported all gas service interruptions, including the numbers of customer affected.</p>	<p>All gas service interruptions, including the number of customers affected and the average duration of the outage, categorized according to whether the interruption was caused by a GP employee/contractor or by any other unplanned cause.</p>
Whether Xcel should continue providing gas service interruption information in the five categories used for October through December 2010.	Already changed in 2011 report	N/A	N/A	N/A	N/A
Whether Xcel should be required to summarize its gas service interruption data using the two categories of gas service interruption as required and used by the other companies. These two categories are: (1) customer outages due to Xcel employee or Xcel contractor and (2) customer outages due to any other unplanned cause. Or whether this information should be reconciled with the more detailed, five-category reporting method Xcel currently uses.	Already changed in 2011 report	N/A	N/A	N/A	N/A
Service Interruptions & Integrity Events - Define calculations for Average Outage Time and Total Outage Time	<p>The start of the outage is when it's noted in our system that the gas is off; if that is not noted, we use the create time of the order. The end of the outage is when it's noted that gas is on; if that is not noted, we use the completion time of the order. The total outage time is the time for all the outages of that time period. The average outage is the total outage time divided by the number of homes affected.</p>	<p>CPE calculates the average duration for monthly outages by taking the total outage time for the month and dividing that by the number of customers lost.</p>	<p>MERC has not provided an average for outage times. MERC is willing to provide this in future Service Quality filings. MERC calculates total outage time as beginning when the outage is reported and completed when service is restored to the last affected customer.</p>	<p>Total outage time is the time from modification of the outage until service is restored to the last customer. Average outage time equals the total outage minutes divided by the total customers out of service.</p>	

Natural Gas Service Quality Reporting Workgroup
Reporting Summary and Changes

	Xcel Energy	CPE	MERC	IPL	GP
Gas Emergency Answer Times	<p>Change: Eff with 2012 report, include internal performance goal for answering gas emergency calls (% percent in 3 seconds).</p> <p>We report calls from our MN customers either directly to our Gas Emergency line or to one of our other customer service numbers where the customer selected the option for a gas emergency. We report the monthly number of gas emergency calls as well as the average speed of answer for those calls.</p>	<p>Change: Eff with 2012 report, include internal performance goal for answering gas emergency calls (% percent in 3 seconds).</p> <p>Schedule 7: The percent of calls received on our published emergency line answered 24x7 within 20 seconds, the average speed of answer and the total number of calls answered. The line may also receive calls other than emergency calls. ASA and total number of calls answered are reported as originally required in Docket G008/GR-04-901.</p>	<p>Change: Eff with 2012 report, include internal performance goal for answering gas emergency calls (% percent in 3 seconds).</p> <p>MERC provides the monthly total calls received, average speed of answer and % answered in 15 seconds or less. MERC also provides the total response time from initial call to arrival for all emergency calls. The numbers are categorized by < 1 hour or > 1 hour. MERC also breaks this information down by service region as requested by the Department. MERC provides the monthly average response time with its goal of having an average response time of 30 minutes or less.</p>	<p>Change: Eff with 2012 report, include internal performance goal for answering gas emergency calls (% percent in 3 seconds).</p> <p>Both gas and electric callers who respond "Yes" to the initial interactive voice response question "Is this a life threatening emergency, such as a downed wire or gas odor?"</p>	<p>Change: Eff with 2012 report, include internal performance goal for answering gas emergency calls (% percent in 3 seconds).</p> <p>Total calls answered, percentage of calls answered in 20 seconds or less, and the average speed of answer.</p>
Please describe how/what you report					
Whether to require Xcel to include in its future annual service quality reports the number of gas emergency calls in addition to the average answer time for these calls.	Already included in 2011 report	N/A	N/A	N/A	N/A
Whether to require the gas utilities to include in their annual reports their goals (internal performance metric) for answering gas emergency calls in terms of the percentage of calls answered within XX seconds	Internal goal is 80/20, though we place a priority on gas emergency calls.	Overall goal of answering 80% of calls within 20 seconds annually for all types of calls.	MERC already provides this information.	We strive to meet the goal of 80%.	Internal goal is 80/20, with a priority placed on gas emergency calls.
Gas Emergency Response Times	<p>Change: Eff with 2012 report, will provide MnOPS reports.</p> <p>We report all gas emergency calls, the count, the answer and talk time, the dispatch response time, travel time, and then the total response time, as well as all averages and % of calls responded to within and over 60 minutes.</p> <p>Other gas emergency calls classification are: blowing gas, carbon, fire, carbon monoxide with and without symptoms, fuel regulator, smelly gas inside, smelly gas outside, no gas, and high or low pressure)</p>	<p>Change: None. Already provides MnOPS reports.</p> <p>Schedule 12: The reporting metric is the time from the initial notification to the time that a qualified emergency response person arrives at the incident location for purposes of making the area safe. Emergency response times are reported by meter and answering a call. Responded to in one hour or less and calls responded to in one hour. CompuTime Energy provides number and the past hour of emergencies responded to within one hour and within more than one hour. CompuTime also provides the average number of minutes it takes to respond to an emergency. This same information, in total, is reported in the Emergency Response Report to the Minnesota Office of Pipeline Safety (MnOPS).</p>	<p>Change: Eff with 2012 report, will provide MnOPS reports.</p> <p>MERC provides the total response time from initial call to arrival for all emergency calls. The numbers are categorized by < 1 hour or > 1 hour. MERC also breaks this information down by service region as requested by the Department. MERC provides the monthly average response time with its goal of having an average response time of 30 minutes or less.</p>	<p>Change: Eff with 2012 report, will provide MnOPS reports.</p> <p>Any call coded as a gas emergency (CO, fire, line hit, odor) will be included in PUC submittals.</p>	<p>Change: Eff with 2012 report, will include an average response time calculation.</p> <p>Emergency response calls categorized by calls responded to in 1 hour or less and calls responded to in over 1 hour. Also report the average response time in minutes.</p>
Please describe how/what you report to the PUC					
Please describe how/what you report to MnOPS	We report five more types of calls in our gas QSP reports than we do in our MnOPS reports based on MnOPS preference (we do not report on any types of carbon monoxide calls, ice/snow on regulator, no gas, and high/low pressure gas to MnOPS).	Provide Monthly required reporting as specified by MnOPS and is duplicated in our PUC report.	Same as above	Any call coded as a gas emergency (CO, fire, line hit, odor) will be included in MnOPS submittals.	Same information is reported to MnOPS on the monthly Emergency Response Reporting Form.
Define call types included in MnOPS Reports	We report the following call types: blowing gas, explosion, fire, smelly gas inside, smelly gas outside	The orders that make up this report include all calls received from customers, contractors, passer-bys, 911 dispatchers, or company personnel relating to gas odors, gas leaks, indications of high pressure, fire, incidents, hit gas lines (either inside or outside).	MERC files 2 annual reports with MnOPS. One report provides emergency call responses in 1 hour or less and those over 1 hour. This report is for all gas leak calls and does not include those that specifically state it is a carbon monoxide call. The other report, Annual Utility Damage Report form, provides the total number of locate requests, total number of damages and the cause for those reported damages. There are 11 categories for the cause for damage.	GP reports fire, explosion, line hits, and odor calls.	GP reports fire, explosion, line hits, and odor calls.

Natural Gas Service Quality Reporting Workgroup
Reporting Summary and Changes

	Xcel Energy	CPE	MERC	IPL	GP
Highlight any differences between MnOFS Reports and MPUC reported items.	See above. We report five more types of calls in our gas QSP reports than we do in our MnOFS reports, based on MnOFS preference	We report the same items.	In the MPUC report MERC provides the % of calls answered in < 1 hour and > 1 hour and the average response time. For mistakes MERC reports the total number of losses as the MnOFS reports but does not have as many cause reasons. The MPUC has only 3 categories, system integrity, fault of MERC or its contractors and other	None. Any call that is coded as an emergency will be included in the statistical reports submitted both to the Commission and MnOFS.	Great Plains was directed to report all gas service interruptions regardless if qualifying as reportable to MnOFS in Docket No. G004/M-11-363.
Whether to require Great Plains to provide, in future annual reports, an average response time calculation for all gas emergency responses.	N/A	N/A	N/A	N/A	GP will provide this information in the 2012 report.
Whether to require the gas utilities to provide, in future annual reports, complete non-redacted copies of their MnOFS Emergency Response Reporting Forms.	Already included in 2011 report	Currently providing monthly Emergency Response Forms	Only if it changes the need to report the same information in the emergency response time in the quality report.	Not an issue to provide this. Will include in the 2012 report.	GP attaches the complete and non-redacted copies of the MnOFS form to its Service Quality Report.
Whether to require the gas utilities to provide, in future annual reports, reconciliations between the gas emergency response numbers reported in their annual service quality reports and the numbers reported to MnOFS in the MnOFS Emergency Response Reporting Forms	It is not possible to reconcile the existing service quality and MnOFS reports due to the breakdown of the categories not matching, due to how the 2 reports require different classification, and the differing ref to ref year/stop of the QSP v. MnOFS forms.	Currently using MnOFS reports to complete Service quality reporting.	No opinion either way.	These numbers should be the same and could be provided.	GP reports the same information
Consider input from the Department on review of those reconciliations, including whether the utilities are accurately reporting their gas emergency response times and reporting data using the correct gas emergency response time metric.	As part of the Working Group, it was determined that all utilities will provide MnOFS reports for their annual reports, so reconciliation is necessary. The Xcel QSP report will additionally be provided as additional reporting that provides an alternative view of its emergency response (as summarized above).	As part of the Working Group, it was determined that all utilities will provide MnOFS reports for their annual reports, so reconciliation is necessary.	As part of the Working Group, it was determined that all utilities will provide MnOFS reports for their annual reports, so reconciliation is necessary.	As part of the Working Group, it was determined that all utilities will provide MnOFS reports for their annual reports, so reconciliation is necessary.	As part of the Working Group, it was determined that all utilities will provide MnOFS reports for their annual reports, so reconciliation is necessary.
Major Incident Reporting	Change: Effective 2012 reports will provide a summary of contemporaneous reports rather than each notification email.	Change: None	Change: None	Change: None	Change: None
Please describe how/what you report.	Similar to our electric reports, we provide a copy of every email we send to the CMO and the individual summary of the notification that was attached to it.	Provides a summary of all notifications from the year.	Provides a summary of all notifications from the year.	Provides a summary of all notifications from the year.	Provides a summary of all notifications from the year.
Customer Service Related O&M Expenses	Change: None	Change: None	Change: None	Change: None	Change: None
Please describe how/what you report	We provide the customer service related O&M expenses included in FERC accounts 901 and 903 plus payroll taxes and SD operations) as well as the state of MN	Schedule 13, includes FERC accounts 901 and 903 plus payroll taxes and benefits.	MERC reports all expenses associated with FERC accounts 901 and 903 plus payroll taxes and benefits.	Costs related to FERC accounts 901 and 903, including payroll taxes and benefits.	The costs recorded in FERC accounts 901 and 903, plus payroll taxes and benefits.
Additional Service Quality Reporting					
Please describe any additional information included in annual service quality reporting	QSP Tariff annual Gas Emergency Response report.	Schedule 14: Steel service line relocation cost, as ordered in Docket G008/M-09-1190	N/A	N/A	N/A
Please describe any additional information included in annual service quality reporting	N/A	Schedule 15: Meters at 630 or Greater Cost, as ordered in Docket G008/M-09-1190	N/A	N/A	N/A
Please describe any additional information included in annual service quality reporting	N/A	Schedule 16: Calls Received from Dedicated Lines, as ordered in Docket G008/GR-04-901	N/A	N/A	N/A
Docket Numbers					
	2002-2011 - E-G002/CI-02-2034 2003 - E-G002/M-03-58 2009 - G002/M-09-841 (SQ TARIFF AMENDMENTS) 2010 - E-G002/CI-10-691 (TARIFF MODIFICATION) 2011 - G002/M-11-360 2012 - G002/M-12-440	2004 - G-008/GR-04-201 2005 - G-008/GR-04-201 2006 - G-008/M-06-1485 2007 - G-008/M-07-1641 2008 - G-008/M-08-306 2009 - G-008/M-09-300 & G-999/CI-09-409 2010 - G-008/M-10-378 2011 - G-008/M-12-425	2003 - G007/CI-02-1309 2004 - G007/CI-02-1309 2005 - G007/CI-02-1309 2006 - G007/CI-02-1309 2007 - G007/CI-02-1309 2008 - G007/CI-02-1309 2009 - G007/CI-02-1309 2010 - G007/CI-02-1309 2011 - G007/CI-02-1309	2010 - G999/M-11-361 2011 - G999/M-12-411	2009 - G-999 / CI-09-409 2011 - G004/M-11-363 2012 - G004/M-12-442

Note: The focus of the workgroup was to identify methods for increasing uniformity in reporting among the gas utilities, making the annual comparisons of data for each utility easier, as well as more useful in assessing the reports and in setting any future reporting requirements.

AGENDA

Natural Gas Service Quality Utility Stakeholder Group

Meeting date: June 22, 2012

Follow-up Actions

(Provide identified information/ responses to Xcel Energy)

Who	What	When
All Utilities	Provide to-date SQ Dockets	Jun 29
	<u>Service Interrupts & Integrity Events:</u> Define calculations for Average Outage Time and Total Outage Time	Jul 13
	Define call types included in MnOps Reports	Jul 13
	Highlight any differences between MnOps Reports and MPUC reported items	Jul 13
	Assess whether can follow the Mislocate criteria provided by CPE (see below)	Jul 13
	Provide description of what is being reported in the Complaint numbers.	Jul 13
CPE	Provide Summary of Cold Weather Rule reporting of involuntary service disconnects	Jun 29
	Provide criteria for when require a Deposit	Jul 13
	Are "special"/ "rebill" reads included in reported Actual and Estimated meter read numbers?	Jul 13
	Provide to attendees, criteria for Mislocate classification	Jun 29
	Include IVR calls in Telephone Response metrics?	Jul 13
IPL	Are "special"/ "rebill" reads included in reported Actual and Estimated meter read numbers?	Jul 13
	<u>Service Connect/Reconnect</u> Separate out credit-related reconnects to report just non-credit-related? If not, include the # of disconnects as a way to approximate just non-credit-related disconnects.	Jul 13
	Separate out the electric Mislocates to get gas-only?	Jul 13
MERC	Include IVR calls in Telephone Response metrics?	Jul 13
GP	<u>Service Connect/Reconnect</u> Separate out credit-related reconnects to report just non-credit-related? If not, include the # of disconnects as a way to approximate just non-credit-related disconnects.	Jul 13

AGENDA
Natural Gas Service Quality
Utility Stakeholder Group

Recommendations/Decisions

- The workgroup output will be a completed all-utility matrix of the “current state” reporting that additionally includes:
 - Metric reporting definitions;
 - Any go-forward reporting modifications that will achieve or improve reporting consistency across the utilities; and,
 - The effective date of noted reporting changes.

In Go-Forward Annual Reports:

- Include the May 1 Compliant report that is required by Minn. R. 7820.0500.
- Meter Reading Staffing Levels:
 - Report by geographic location;
 - Include text re; whether Meter Readers have other/non-meter reading responsibilities; and,
 - Indicate whether AMR is deployed in each reported area.
- Involuntary Service Disconnects: Include a summary modeled after the 2011 CPE summary of Cold Weather Rule reports.
- Lost Gas: Include a statement that provides a “tie” to the lost gas related to system damages issue that is going on in the AAA Docket(s).
- Provide MnOps event reports.
- Provide a summary of contemporaneously-reported events/incidents, rather than the actual email notifications sent at the time of the event.

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-13-366

Dated this 26th day of **June, 2013**

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tamie A.	Aberle	gpngregulatory@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck, ND 585014092	Electronic Service	No	OFF_SL_13-366_M-13-366
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	Yes	OFF_SL_13-366_M-13-366
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_13-366_M-13-366
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_13-366_M-13-366
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	Yes	OFF_SL_13-366_M-13-366