MINNESOTA
PUBLIC UTILITIES COMMISSION

Staff Briefing Papers

Meeting Date	April 23rd, 2026		Agenda Item **3***
Company	Northern States Power Co. d/b/a Xcel Energy, Great Plains Natural Gas Co., CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas, Minnesota Energy Resources Corp., and Greater Minnesota Gas, Inc.		
Docket Nos.	**G-002/M-25-31** **G-004/M-25-32** **G-008/M-25-33** **G-011/M-25-34** **G-022/M-25-35**		
	In the Matter of Xcel Energy's, Great Plains', CenterPoint Energy's, Minnesota Energy Resources', and Greater Minnesota Gas's Service Quality Report		
Issue	Should the Commission accept Xcel Energy's, Great Plains', Center Point Energy's, Minnesota Energy Resources', and Greater Minnesota Gas's 2024 Service Quality Reports?		
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✓ Relevant Documents	Date
Xcel Energy (Docket No. 25-31)	
2024 Natural Gas Service Quality Performance Report	05/01/2025
Department of Commerce Comments	09/23/2025
Xcel Energy (Northern States Power Company) Reply Comments	10/03/2025
ANSWER to PUC Information Request (IR)1 and 2	03/19/2026
Great Plains Natural Gas (Docket No. 25-32)	
2024 GPNG Gas Service Quality Report	05/01/2025
Department of Commerce Comments	09/22/2025
Great Plains Natural Gas Co. Reply Comments	10/03/2025
Great Plains Natural Gas Co. [IR] Reply Comments	03/19/2026
CenterPoint Energy (Docket No. 25-33)	
CenterPoint 2024 Natural Gas Service Quality Report	05/01/2025
CenterPoint Energy Letter (originally filed in E,G-999/CI-20-375)	05/08/2025
DOC IRs 001-003 CenterPoint Energy Minnesota Gas Answer	07/28/2025
Department of Commerce Comments	09/22/2025
CenterPoint Reply Comments	10/27/2025
Minnesota Energy Resources Co. (Docket No. 25-34)	
2024 Gas Service Quality Report	05/01/2025
Department of Commerce Comments	09/23/2025
Minnesota Energy Resources Corporation Reply Comments	10/03/2025
Department of Commerce Letter	10/15/2025
ANSWER MERC Response to PUC Information Request 001	03/19/2026
Greater Minnesota Gas (Docket No. 25-35)	
2024 Annual Gas Service Quality Report	05/01/2025
Department of Commerce Comments	09/23/2025

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OVERVIEW AND PURPOSE

This briefing paper reviews the **2024** Annual Gas Service Quality Reports for Minnesota's five rate regulated gas utilities: Northern States Power Company d/b/a Xcel Energy ("Xcel"), Great Plains Natural Gas Co. ("Great Plains"), CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint" or "CPE"), Minnesota Energy Resources Corporation ("MERC"), Greater Minnesota Gas, Inc. ("GMG"), collectively referred to as "the Gas Utilities."

This Briefing Paper covers all five 2024 gas service quality reports. This document evaluates the reports' content and adequacy, leading to the key question of whether the Commission should accept the Gas Utilities' reports (**Decision Option 1)**. The gas utilities report information on the topics A-N listed below.

A. Pipeline and Hazardous Material Safety Administration ("PHMSA") Gas Distribution Reports
B. Call Center Response Times
C. Meter Reading Performance
D. Involuntary Service Disconnections
E. Service Extension Requests
F. Customer Deposits
G. Customer Complaints
H. Gas Emergency Phone Line Answer Times and Gas Emergency Response Times
I. Excavation Damages
J. Service Interruptions
K. Major Incident Reporting and MNOPS Violations
L. Integrity Management Plan Reporting (Leaks)
M. EFV and Manual Shut-off Valves
N. Web-Based Metrics

As staff expect gas utilities to file **2025** data on May 1, 2026, these briefing papers will focus on flagging trends to follow up on in the 2025 data; these trends will be discussed in the conclusion. Staff also identify topics that align with other Commission proceedings. More broadly, staff flag the intent to explore whether rising customer arrears and disconnections stem from broader economic challenges or from underlying issues in specific utility service practices. Staff intend to discuss these macro-level trends in analyses of the 2025 data, filed in 2026.

BACKGROUND

The Commission requires rate-regulated gas utilities, Northern States Power Co. d/b/a Xcel Energy, Great Plains Natural Gas Co. (GP), CenterPoint Energy (CP), Minnesota Energy Resources Corp. (MERC), and Greater Minnesota Gas (GMG), to file annual service quality reports. Standards and reporting requirements have been established over time through Commission Orders. The Commission's August 26, 2010 Order is the foundation for gas service quality reporting requirements, including basing many of the gas reporting

requirements on the electric utility standards explained in Minnesota Rules chapter 7826.[1] These rules will be referenced throughout the briefing paper.

In 2023, a natural gas working group ("NGWG") met to discuss comparative performance metrics for use in future gas service quality reports. The group included the Gas Utilities, the Minnesota Department of Commerce ("Department"), the Minnesota Office of Pipeline Safety ("MnOPS"), and Commission Staff. It was created in response to the Gas Utilities' 2020 service quality reports and a joint utility filing that discussed their efforts to find appropriate ways to compare gas utility service quality performance. During the NGWG, the utilities presented metrics they believed were appropriate for comparison across utilities.[2] These metrics will be discussed throughout the briefing papers.

Based on the NGWG recommendations, the Commission authorized the executive secretary to create a comprehensive list of current gas service quality reporting requirements, which all Gas Utilities must use in future reports. This list was filed on February 2nd, 2024, in Docket No. G002, G022, G004, G011, G008/CI-22-548 ("Gas Service Quality Reporting Requirements List"). In that notice, staff anticipated the list being updated annually as needed, with updates included within the Orders addressing annual gas service quality reports (**Decision Option 2**).

This briefing paper discusses gas utilities' 2024 data. The gas utilities made initial filings on May 1, 2025.

By September 23rd, 2025, the Department of Commerce (the Department) had filed initial comments on all reports.

By October 3rd, 2025, Xcel Energy, Great Plains, and MERC had filed reply comments.

By October 27th, 2025, CenterPoint Energy submitted its reply comments. GMG did not file reply comments.

On March 4th, 2026, Staff submitted information requests (IRs) to Xcel Energy, Great Plains, and MERC. The companies replied by March 19th, 2026. IRs concerned "zero-out" data dating back to 2017 to better understand customer experiences and potential frustration with Interactive Voice Response (IVR) menus. See section B, Call Center Response Time.

The second request was to Xcel Energy only. Staff asked Xcel to provide additional detail on specific types of complaints that would fall under the four subcategories of "Inadequate Service" listed (Cold-weather Rule (CWR) Protection, Customer Service, Field/Operations, Programs and Services). See section G, Customer Complaints.

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[1] Order Setting Reporting Requirements issued August 26, 2010, docket no. G-999/CI-09-409 at 4, "The Commission concurs with the OES on the importance of establishing uniform reporting requirements for gas utilities and in modeling them after the electric utility standards contained in Minnesota Rules, Chapter 7826."

[2] NGWG docket no. G002, G022, G004, G011, G008/CI-22-548 meeting #2 slides filed April 26, 2023, slide 10 explaining that call response, field response, service extensions, leaks, excavation damages, and service outages were considered by utilities in terms of the suitability of each for comparison across utilities.

REPORTS

A. Pipeline and Hazardous Material Safety Administration (PHMSA) Gas Distribution Reports

The reporting requirement applies to all Gas Utilities, which must include their annual PHMSA Gas Distribution Reports with their Gas Service Quality Reports.[3] The PHMSA format changed in 2024, now including more detailed data on excavation damage counts. This change also involved replacing the term "locate tickets" with "excavation tickets" throughout.

1. Staff Analysis

Staff adjusted historical data to reflect these changes and updated the terminology. Staff confirm that utilities filed all required data for this section. Staff would request that utilities include machine-readable PHMSA reports, rather than PDFs, to make the documents more accessible and to expedite analyses (**Decision Option 3**).

B. Call Center Response Time

Following Minnesota Rules parts 7826.1200 and 7826.1700, all gas utilities are required to report the percentage of calls answered within 20 seconds each month, while GMG reports the total number of calls received and how many rings occur before calls are answered; all utilities must also report average answer time, and CenterPoint must continue reporting IVR "zero-out" data.

Overall, for 2024, all gas utilities complied with the call center reporting requirements and response time metrics except for Xcel Energy. During their presentation to the NGWG, the gas utilities believed it was appropriate to review a single utility's performance over time, but less appropriate to compare across utilities. This is because some utilities are reporting different versions of this metric.[4] Thus, staff highlight data from three utilities, each compared against the 20-second benchmark.

- **MERC** answered 80% or more of calls within 20 seconds. However, MERC's call volume decreased by 32%, as noted by the Department. Also, the average wait time for MERC customers to speak with an agent decreased to 12 seconds, a 46% improvement over the historical average.[5]
- **GMG** does not have a traditional call center; incoming calls are answered directly by their customer service team or a professional live answering service after hours. GMG's total call volume dropped in 2024, which it attributed to the implementation

[3] Filed February 2, 2024 in Docket G002,G022,G004,G011,G008/CI-22-548

[4] NGWG docket no. G002, G022, G004, G011, G008/CI-22-548 meeting #2 slides filed April 26, 2023, at 12. Slides did not explain how reported data were different.

[5] Docket No. 25-34, Department Comments, pp. 3.

of new billing software and a new customer portal that allows customers to manage accounts electronically. The Department concluded that GMG met the call center response time reporting requirement.[6]

- **Xcel** did not meet the 80% benchmark, answering only 79.7% of total calls within 20 seconds. The Department's analysis of Xcel's performance highlighted that when calls requiring a live agent were isolated, compliance dropped further, with only 42.6% answered within 20 seconds (a 19.2% decrease from 2023). Xcel's average response time increased to 349 seconds, up from 76 seconds the previous year. Xcel attributed performance to staffing challenges and severe weather events.[7]

Table 1 shows utility responses to staff's information request concerning "zero-out" data. "Zero-out" data is the number of customers who exit an IVR menu to speak directly with an agent and may provide evidence of frustration with Interactive Voice Response (IVR) menus. CPE has long provided IVR data in response to a Commission Order.[8] Staff wanted to better understand customer experiences with IVR at other utilities.

Table 1. Information Request #1 "Zero-Out" information:

Year	GPNG (Initial "Speak to Agent" Selections)	Xcel Energy (Total "Opt-Out" Calls)	CenterPoint Energy (Total "Zero-Out" Calls)
2017	*Not available*	925,964* (27%)*	1,784 (0.11%)
2018	20,537 (89%)	539,930 (17%)	2,210 (0.13%)
2019	20,972 (88%)	509,745 (16%)	2,596 (0.15%)
2020	16,716 (79%)	456,903 (16%)	1,497 (0.11%)
2021	19,699 (69%)	452,783 (17%)	1,948 (0.13%)
2022	23,519 (53%)	513,167 (18%)	2,415 (0.14%)
2023	23,560 (53%)	548,958 (18%)	2,349 (0.13%)
2024	20,595 (52%)	528,959 (16%)	2,263 (0.14%)

*The 2017 data are not directly comparable to subsequent years because they reflect different contact center operating hours.

1. Staff Analysis

Staff confirm that utilities filed all required data for this section. Staff will discuss IVR data and relevant dockets.

IVR Data. As shown in Table 1, "zero out" values varied significantly across utilities.

[6] Docket No. 25-35, Department Comments, pp. 21.

[7] Docket No. 25-31, Department Comments, pp. 3.

[8] Order issued on March 17, 2015, in docket no. G008/M-14-316, which required CP to provide "zero-out" data with the rollout of their new IVR system to monitor customer responses.

Instead of reflecting different customer behaviors, staff suspect this is due to different methods used by the utilities' IVR phone systems and different data-collection methods.

- GMG does not have an IVR system.
- GP does not technically have a "zero-out" option because callers are immediately presented with a choice to "speak to an agent" upon entering the system. Instead, they provided data on calls where the caller selected this initial agent option rather than progressing through the IVR.
- Xcel does not track specific prompts used to reach a live agent; rather, they group all callers who choose any option to connect with a live agent at any point into a single "opt-out" category.
- MERC did not collect IVR information in its legacy PureConnect system and noted that tracking IVR in its new GenCloud IVA system (implemented in April 2024), which uses natural language understanding rather than a traditional "press or say" menu, is impractical. MERC also observed that choosing to speak with an agent shouldn't automatically be interpreted as "IVR fatigue" or dissatisfaction, since many tasks are intentionally designed to require a live agent.

Staff also contacted the Commission's Consumer Affairs Office (CAO) regarding complaints about the IVR systems. The CAO indicated there were few.

Based on the information above and utility data, Staff concluded that the Commission could consider retiring the zero-out data, as there have been no significant issues with IVR systems, and the technology is no longer new. Moreover, the IVR reporting was required in Order, not in Minnesota Rule 7826.1700 (**Decision Option 4).**

Relevant dockets. The Commission is also tracking Xcel's call center performance in the Electric Service Quality proceedings, heard annually, and in Xcel's Quality of Service Plan (QSP) proceeding. Furthermore, Xcel's QSP requirements are currently under discussion in a new proceeding. The Commission authorized a new docket, no. E, G-002/CI-26-85, to establish a performance-based regulatory framework focused on Xcel's customer service and incorporating metrics from Xcel's QSP, including telephone response time.[9] Beyond these dockets, staff will continue to monitor Xcel's performance when 2025 data are filed.

C. Meter Reading Performance

Minn. R. 7826.1400 requires reporting, for each customer class and each month, the number and percentage of meters read by the utility and self-read by customers. Utilities also report the number and percentage of meters unread. MERC reports data with and

[9] Order Distributing Underperformance Payments and Opening New Docket issued January 9, 2026 in docket nos. E,G-002/CI-02-2034 and E,G-002/M-12-383 and ordering paragraph 8.

without its 1,763 Farm Tap customers.[10] Last, utilities report the number of meter-reading staff.

The Commission required utilities to indicate whether the gap between total meters (100%) and meters read (by the utility or customers) matches exactly the percentage of estimated meter reads. These data were included in the Commission's February 2, 2024 Order. Originally, these data appeared to have been a one-time reporting requirement.[11] MERC explained that it aims to avoid estimating bills and estimated very few (0.6%); Xcel anticipates fewer estimated bills as it transitions to full AMI; GP read most meters with AMR and estimated 0.01%; GMG estimated 104 meters or 0.08% of total meters; CPE reported estimating an average of 6,426 meters/month (0.7% of total meters).

Most meters were read by the utility; very few were customer-read. All utilities except MERC read 99+% of meters, while MERC read 97%. GP and GMG had no meters going unread for 6 months or more. In contrast, 25 of MERC's meters were unread for 6-12 months, and 2 were unread for over a year. CPE had 186 unread for 6-12 months and 33 unread for over a year. Xcel had about 8,500 unread for 6-12 months (about 50% fewer than last year) and 4,000 unread for over a year (about 600 fewer than last year). Xcel appears to provide data for both gas and electric systems.

- **Xcel** read 99.76% of meters, primarily through Automated Meter Reading (AMR) systems. In 2024, Xcel was finalizing upgrades to gas meter communication equipment to enable drive-by reading. Xcel will own the new modules that will replace the Cellnet service, which expires on December 31, 2025. This change eliminates dependence on third-party equipment. By the end of 2024, approximately 343,000 of 437,000 meters were upgraded.[12]
- ***Xcel Specific Requirement:*** Xcel reports meter-equipment-related field orders,

[10] MERC reports with and without Farm Taps. Order Setting Reporting Requirements issued August 26, 2010, in docket no. G-999/CI-09-409 at ordering paragraph 2. Staff found the explanation of this in the Order issued October 23, 2015, docket no. G-011/M-15-410. On page 3 of the Department analysis, "The Department notes that MERC has a large percentage of farm tap customers. These customers are required to self-read their meters, and to allow MERC to read the meters annually." MERC's website defines Farm Tap as "a private natural gas line along with the associated facilities downstream of the meter that are owned by the landowner. These facilities include the odorizer and gas fuel line from the outlet of the meter (usually located close to the interstate pipeline) to the house or other buildings on the property."

[11] Order Accepting Reports and Setting Further Requirements, issued March 6, 2012, docket no. G007,011/M-10-374 at 3 states, "Require the utilities to explain, in their 2011 annual reports, whether the difference between…" which indicates to staff a one-time reporting item. Other requirements indicated continued reporting, "beginning with their 2011 annual reports."

[12] Considering Xcel's entire gas and electric customer base, Xcel wrote in its electric service quality proceeding, docket no. E002/M-25-27, on April 1, 2025, Part 1, "The full deployment of AMI is planned to be substantially complete by the end of 2025 (at 4)." Footnoted, "As noted in our November 1, 2024 filing in Docket No. E002/ M-24-371, there is a small proportion of customers that will not have an AMI meter installed by the end of mass deployment in 2025. These customers have meters with 'KYZ' contacts, which provide energy pulses or load control signals for energy management purposes."

including investigations and remediations, referrals, and completed remediations after referral; it also reports response times and the volume of excluded field orders. According to the Department, for meter equipment malfunctions, the average response time increased in 2024, but Xcel did not exceed the maximum response targets set in its rate book.[13] From the time a meter equipment issue is identified, Xcel has nine days to investigate and 15 days to remediate.[14] Xcel reported it was within parameters for 75% of gas orders. Xcel faced a staffing issue that hindered its ability to meet targets, but it was resolved.

- **MERC:** The Department observed that MERC's dedicated meter-reading staff's logged meter-reading hours decreased by about 90-92% compared to the 10-year average.[15] This decline was attributed to MERC's adoption of advanced metering infrastructure (AMI), which eliminated the need for manual meter reading. MERC's 2024 results for its farm tap customer group are consistent with the yearly averages and show slight improvements over 2023.
- **GP and GMG:** Both companies use AMI systems to read meters. No meters were self-read, and no meters went unread.

In Table 2, Staff provide additional information on unread meters for applicable utilities.

Table 2: Top Reasons for Unread Meters 6-12 months and 12+ months

Utility	Top Reasons for Unread Meters (Residential)	Top Reasons for Unread Meters (Commercial/Industrial)
Xcel	No reading returned (86%), OC meter maintenance (5%), Other (6%)	No reading returned (66%), Meter off (7%), SPS dead register (5%), No answer (3%), Need key or code (3%), Other (16%)
MERC	Processing delay, AMI network issue, farm tap, accessibility (not ranked by % for MERC)	
CPE	ERT not responding (96%), Other (4%)	ERT not responding (97%), Other (3%)

*GP and GMG had no meters going unread for 6 months or more.

- "No reading returned" for Xcel describes situations where Xcel was unable to collect a reading in previous months due to customer-related issues, such as access issues or a meter that has been turned off, and so Xcel would move on to more accessible unread meters.
- MERC finished constructing nearly all its AMI system in 2023 and kept improving it in 2024, leading to its highest monthly meter readings to date. Data filed for 2025 will offer an opportunity for additional review of AMI performance.

[13] Docket No. 25-31, Department Comments, pp. 18.

[14] The average annual response targets are set in the Natural Gas Rate Book Section 6, Sheet 13.1. See also Department comments for Docket No. 25-31, pp. 18.

[15] Docket No. 25-34, Department Comments, pp. 7.

- "ERT not responding" traditionally, for utilities, indicates that a meter endpoint is not communicating with the utility system.

1. Staff Analysis

Staff confirm that utilities filed all required data for this section. In 2025, data staff will continue to monitor meters going unread for 6-12 months and more than a year. Staff will also monitor Xcel's performance as AMI rollout is completed.

Staff also note that in 2023, CAO identified an issue with utility meter readings; CPE knowingly delayed repairing or replacing malfunctioning meters for months, as the company can bill customers retroactively for up to a year, resulting in unexpected charges for customers when meter is replaced and bill is trued up. Xcel had a similar issue; it was resolved when Xcel agreed to follow Minn. R. 7826.1000.[16].

Rather than ordering action for CPE, at the Commission's December 19, 2024, agenda meeting, Commissioner Tuma suggested, and the other commissioners agreed, to remove the decision option, if CPE resolved the issue with its customers.[17] CPE agreed.

For this briefing paper, the Staff followed up with the CAO to confirm that the issue of CPE knowingly delaying repairs or replacements of malfunctioning meters for months was resolved. The CAO confirmed that the number of complaints has decreased. This indicates CPE is complying with its agreement.

D. Involuntary Service Disconnection Data

The Commission permits utilities to meet the involuntary disconnection reporting requirement (as outlined in Minn. R. 7826.1500) by including information they already collect under Minn. Stat. §§ 216B.091 and 216B.096. This includes counts and dollar amounts of overdue accounts, assistance payments from LIHEAP, average monthly bills, total sales revenue, and write-offs for uncollectible accounts. The additional data must also record disconnection activities—such as notices mailed, accounts disconnected for nonpayment, accounts reconnected, and accounts remaining disconnected. During the cold-weather rule period (October–April), monthly reports must also include activities related to cold-weather protection and payment arrangements.

Overall, all utilities sent fewer disconnection notices (Table 3). CPE, MERC, and GP disconnected fewer residential customers for non-payment. GMG disconnected just four more customers but reported increases in past due customers and the amount past due. Xcel disconnected more than twice as many customers compared to 2023.

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[16] See staff briefing paper for meeting date December 19, 2023 in docket no. G002/M-24-31 at 17.

[17] See staff briefing paper for meeting date December 19, 2023 in docket no. G002/M-24-31 at 17. Offered decision option, "Require Gas Utilities to replace malfunctioning meters within ten calendar days of learning of their inaccuracies as described in Minn. Rules, part 7826.1000."

Table 3. Residential Customers in 2024, (Decrease or Increase, compared to 2023)

Utility	Average arrears	% Customers Past Due	Disconnects	Disconnection Notices Sent
Xcel	$500 (-$40)	13% (-1%)	52,500 (2x as many)	734,700 (-40,000)
CPE	$180 (-$90)	11.4% (+ 1.4%)	27,036 (-1,000)	283,400 (-2,000)
GMG	$150 (+$50)	8% (+3%)	43 (+4)	705 (-1,000)
GP	$70 (-$75)	22% (-1.4%)	600 (-75)	4,200 (-45)
MERC	$140 (-$60)	14.75% (-0.5%)	3,900 (-1,200)	46,600 (-15,000)

*The value in parentheses shows how the data reported in 2024 compared to 2023. So, if the value in parentheses is (-40), that means that the 2024 value was 40 less than the 2023 value. Red color highlights where 2024 values increased from 2023. Values are rounded.

Xcel: While Xcel reported fewer past-due customers and fewer disconnection notices sent, it reported almost double the number of disconnections. Of note, Xcel reports combined gas and electric customers and can perform remote disconnections. Xcel reported 52,549 disconnections in 2024, compared with 24,722 in 2023. However, Xcel reconnected 57% of customers within 24 hours in 2024, compared with only 45% in 2023.

14,772 fewer customers sought CWR protection than in 2023. Unlike MERC and CPE, Xcel reported nearly 2,000 more Energy Assistance Plan (EAP) customers in 2024 compared to 2023.

The Department reviewed Xcel's filing and explained that Xcel attributed the high disconnection rate to economic challenges and large arrearage balances. The Department also noted that the average past-due dollar amount per customer fell from $540 to $499.[18]

CPE: reported fewer customers disconnected than in 2023. However, the Department noted that the number was 54% higher than the seven-year pre-pandemic average.[19] However, 10,000 fewer customers sought CWR protection than in 2023, and fewer customers were enrolled in EAP benefits (24,247 cumulative in 2024 versus 30,654 in 2023).

MERC: also reported fewer disconnections than in 2023. However, like CPE, MERC reported fewer customers seeking CWR protection (1,907 customer requests in 2024 versus 3,361 in 2023) and fewer enrolling in EAP (year-to-date: 5,985 customers in 2024 versus 6,752 in 2023).

GP: Like CPE and MERC, fewer customers were disconnected for non-payment in 2024. However, the Department called attention to a trend: since the end of the 2020 COVID-19 moratorium, the total number of disconnection notices sent has decreased, but a higher percentage of customers receiving those notices are ultimately disconnected. The Department stated that it will monitor this and may seek ways to reduce disconnections if

[18] Docket No. 25-31, Department Comments, pp. 10.

[19] Docket No. 25-33, Department Comments, pp. 9.

the percentages continue to rise.[20] GP reported 40 CWR requests in 2024, up from 19 in 2023.

GMG: While GMG had only four more disconnections in 2024 than in 2023, the average amount past due for customers increased from about $100 in 2023 to about $150 in 2024. More, the number of customers past due increased, with 786 accounts past due in 2024 compared to 463 accounts past due in 2023. GMG has had very few CWR requests in the past few years.

1. Staff Analysis

Residential disconnections for nonpayment, especially in times of great concern for consumer affordability, are at top of mind for the Commission. Commissioners were recently presented data on these topics at the February 24, 2026 Planning Meeting. Further, Staff recently filed a notice of comment capturing several of the themes of the Commission's February 24, 2026 planning meeting. Utilities were asked to comment on the feasibility of utilities providing additional data to explain the role utilities are playing to decrease the burden of paying bills, avoiding disconnection, and returning to service.[21]

Staff confirm that utilities filed all required data for this section. Staff will continue to monitor trends, especially EAP and CWR benefits, as well as the number of customers disconnected, and compare 2024 customer status to 2025 data expected May 1, 2026.

E. Service Extension Requests

Minn. R. 7826.1600 requires utilities (excluding GMG) to report service extension activity by customer class, including the number of customers requesting extensions and the time between service installation and either the customer-requested in-service date or the date the premises are ready for service. Utilities must provide data for new locations and previously served locations. Additionally, these same utilities must report the types of extension requests, such as reconnection requests after disconnection for nonpayment, for both previously served and not previously served locations.[22]

- New service extensions might include new homes or buildings, or rural areas connected for the first time. As these locations have not been served before, utilities often need to build new infrastructure to reach them.
- Existing service extensions refer to previously served locations that are now inactive. This could be due to situations such as homes where tenants have moved out, and the service was shut off, reconnection after disconnection for

[20] Docket No. 25-32, Department Comments, pp. 6.

[21] Commission planning meeting held February 24, 2026, External Planning Meeting - 02/24/26 - Annual Residential Customer Metrics Update, and Notice of comment, March 23, 2026, docket no. E,G999/PR-26-2.

[22] First Ordered on March 6, 2012, in Docket Nos. G002/M-11-360, G-001/M-11-361, G-004/M-11-363, G-007,011/M-10-374, G-008/M-10-378, and G-022/M-11-356

nonpayment, or seasonal properties having their service turned back on. This does not typically require building or extending new lines.

GMG uses different metrics because of its unique service model. When GMG extends service to a new area, it generally serves an entirely new rural area with a new main and then services, rather than a new development on the edge of an existing service area. GMG provides information on extensions into new service areas, additions of new customers on existing mains, discussions of requests to change service in areas already served, copies of advertisements to potential new customers, the date deposits were first collected for a new service area, and explanations for denying service to customers along existing mains and services.

During the NGWG, utilities did not recommend comparing extension response time across utilities. This is because extension times may be influenced by construction conditions, including rural versus metro area, supply chain issues, and contractor relationships. Considering these variables, comparing performance within a single utility over time may not be useful either.[23]

1. Existing Service Reconnection

Table 4. Time, in Days, to Reconnect Existing Service and *(+/- change from 2023)*

Utility	Residential	Commercial
CPE	2 *(-4)*	7 *(+2)*
GP	1 *(no change)*	1 *(no change)*
MERC	0 *(no 2023 data)*	0 *(no 2023 data)*
Xcel	3.2 *(+1.6)*	2.1 *(+0.5)*

*A positive value in parentheses indicates time to restore service increased from 2023, while a negative value indicates that time to restore service decreased from 2023.

[23] NGWG docket no. G002, G022, G004, G011, G008/CI-22-548 meeting #2 slides filed April 26, 2023, at 13-14.

2. New Service Installations

Figure 1. New Residential Installs

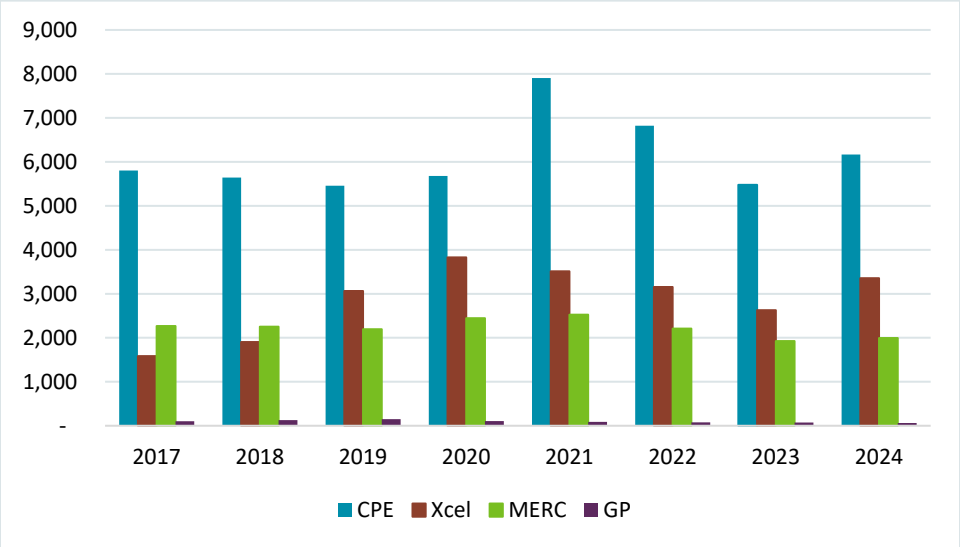
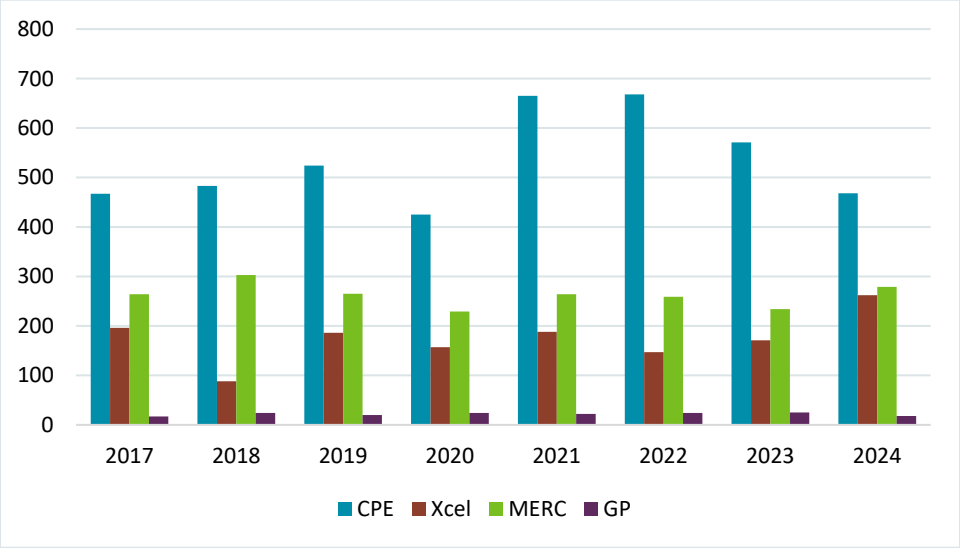


Figure 2. New Commercial Installs



*GMG provides different metrics because of its unique service model.

When considering data from 2017-2024, deliberately including both pre- and post-pandemic years, Staff observe that requests for new natural gas service are relatively steady across reporting utilities, indicating ongoing customer demand despite broader electrification trends. CenterPoint, Xcel, MERC, and GMG saw increases in new service extension requests (whether residential, commercial, or both).

Figure 3. Average Days to Complete New Residential Installs

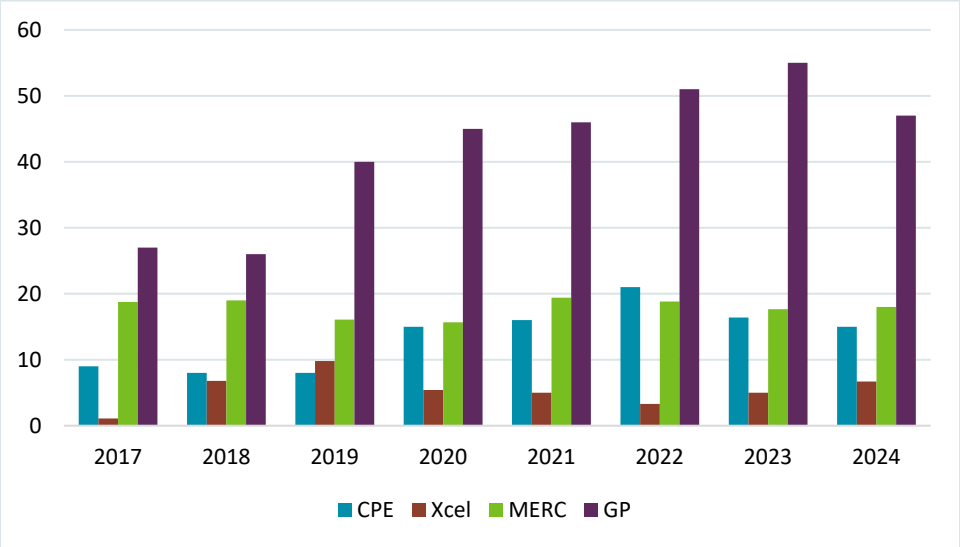
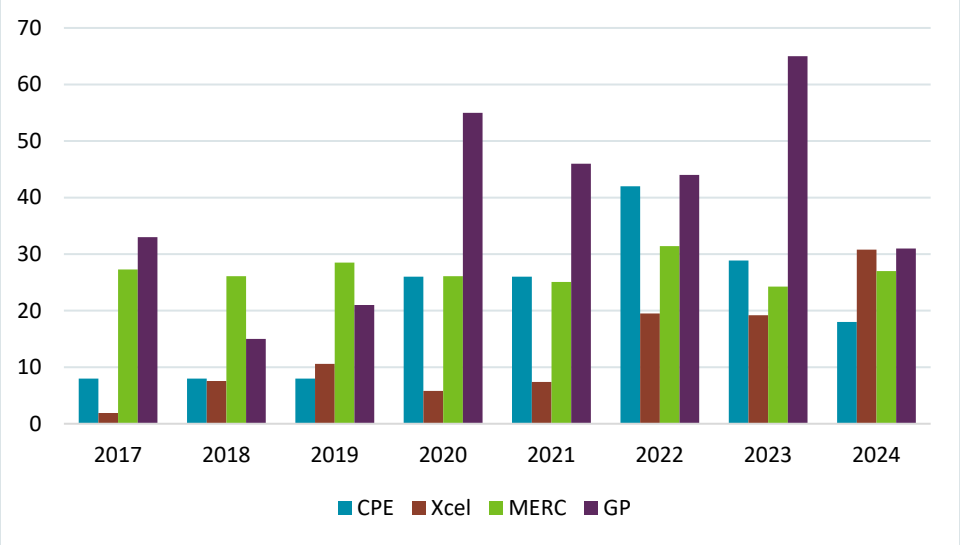


Figure 4. Average Days to Complete New Commercial Extension Request Installs



*GP reported timelines reflect the period between service line installation and meter set, which is customer request-driven.

3. Time to complete installation of extension requests

- **Xcel's** new commercial installations took longer to complete than in 2023 and exceeded historical averages. The Department noted that commercial service extension requests in 2024 took significantly longer than the five-year average, nearing 31 days. Xcel explained that commercial services are becoming more complex, requiring larger-diameter pipes, and increased coordination with the businesses' personnel.[24]

[24] Docket No. 25-31, Department Comments, pp. 8.; Xcel initial filing at pp. 8.

- **CPE's** 2021 rise in extension requests at previous locations was due to a change in reporting methodology. Beginning in 2021, CPE included meter set installations alongside service line installations, causing a spike that normalized in 2024, consistent since the methodology change.
- **GP** took longer to complete new installations because the reported timelines cover the period from service line installation to meter set. Any delays between these steps are customer-driven (for example, the house not being finished or the customer not moving in yet), and meters are typically installed within one to two days of the customer's request. Thus, the "longer times" for GP may not reflect service but rather be an artifact of GP reporting data differently.
- **GMG** did not undertake any major new area main extension projects. Instead, GMG focused on infilling its existing territories. The Department concluded that GMG complied with the Commission's updated reporting requirements relative to service extensions.[25]

Staff confirm that utilities filed all required data for this section.

F. Customer Deposits

In alignment with Minn. Rules part 7826.1900, all gas utilities must report any changes to their deposit collection policies in their annual service quality reports whenever such policies are updated. They should include a description of the previous policy, the new policy, the reason for the change, and three years of data showing how many customers were required to make deposits and the total deposits held at the end of each year.

Overall, no utility changed its deposit policy. In 2024, no utility, apart from GMG, collected a deposit to return a customer to service. Apart from deposits, however, utilities charged customers a variety of other fees (Table 5).

GMG may require a deposit from existing customers who were disconnected due to non-payment. In 2024, GMG required a deposit, which it later refunded when the customer left GMG's service. GMG returns customer deposits after twelve months of timely payments.

MERC: With Commission approval, MERC increased the maximum deposit that can be charged to customers, from one to two months' average usage.[26] MERC reported that for 2022, 2023, and 2024, no customers were required to make a deposit as a condition of receiving service, but in 2024, MERC held a total of eight deposits.

Xcel: offered additional information about some of the fees charged. Xcel "requests deposits" if customers are in bankruptcy proceedings; then, once bankruptcy is declared,

[25] Docket No. 25-35, Department Comments, pp. 21.

[26] MERC initial filing at 7-8. "As detailed in the Direct Testimony of Joylyn C. Hoffman Malueg in Docket No. G011/GR-22-504 at pages 51 through 53, the reason for this change is that historically, MERC has been severely under-secured with the maximum deposit calculation for residential customers being one month's usage."

service is restarted, and the deposit amount is applied to the account.[27] More, Xcel stated that starting in 2025, it modified down payment percentages, and that doing so, "should positively impact credit-related complaints throughout 2025 and beyond."[28]

Table 5. Utility Fees

Utility	Reconnection Fee Charged to Restore Service, Average	Payment Arrangement, monthly average for 2024	If required to restore service to start a payment arrangement, Down Payment Amount	Interest/ Penalties/Fees, Average
Xcel	$16	34,410 customers $204 / month for 6.6 months	50% of shutoff amount	$8
CPE	$29	3,121 customers $116 / month for 9 months	$353	$3
MERC	$30	2,015 customers $43 / month for 13.6 months	28% of past due balance	Do not charge
GP	$45 + some of outstanding bill	80 customers $103 / month for 4.5 months	Do not charge	$64 A balance of $10+ is subject to the greater of a late payment charge of 1.5% per month, or $1.
GMG	$75	1 customer $209/ month for 3 months	Do not charge	$1-3. A balance of $10+ subject to 1.5% of balance

1. Staff Analysis

Staff confirm that utilities filed all required data for this section. In addition to gas service quality, the various fees charged to customers were also discussed in electric safety, reliability, and service quality proceedings, and late fees are being discussed in Xcel's electric and gas rate cases, where CUB proposed to eliminate or limit late fees.[29] Staff wanted to understand the magnitude of fees collected from customers. A rate case

[27] Xcel initial filing at 8

[28] Xcel initial filing in Docket no. made at 10

[29] Crawford direct testimony March 6, 2026, Xcel Gas Rate Case docket no. G002/GR-25-356 at 19.

decision for Xcel Electric is due from the Commission by July 31, 2026, and for Xcel Gas by November 30, 2026. Staff will review information from rate case proceedings, as available, and include in briefing papers for 2025 data filed in 2026, focused on questions like how late fees are currently reflected in rate cases and how the revenue is used by the Companies.

G. Customer Complaints

Following Minn. R. 7826.2000 and 7820.0500, gas utilities (excluding GMG) report detailed complaint metrics, including the total number of complaints received, the count of complaints by subject[30], time to resolution, method of complaint resolution[31], and the number of complaints forwarded to the Commission's Consumer Affairs Office (CAO) for further investigation and action.[32] GMG provides similar reporting that lists CAO-originated complaints and the total number of complaints resolved for each category.

Overall, utilities resolved most of their complaints upon initial inquiry. GP and GMG had very few complaints. CPE had 1,000 fewer complaints than in 2023. Conversely, MERC (298 complaints in 2023) and Xcel (759 complaints in 2023) had higher totals of residential, commercial, and industrial complaints in 2024 than in 2023; see Table 6. Note, Xcel reports a combined total for gas and electric customers.

Table 6. Utility complaints, by customer type, for 2024

Utility	Residential	Commercial	Industrial
CPE	3,161	235	0
GMG	1	0	0
GP	23	1	0
MERC	768	63	
Xcel	1,929	50	2

MERC explained its increase in complaints, "This increase is due to continued training and call center agent adherence towards customer satisfaction through the capturing of

[30] Subject: billing errors, inaccurate metering, wrongful disconnection, high bills, inadequate service, service extension intervals, service restoration intervals, and any other subject that constitutes five percent or more of complaints.

[31] Methods of Resolution: as taking the action requested by the customer; taking an agreed compromise action; providing information showing the matter was not reasonably within the utility's control; or refusing the customer's requested action

[32] Additionally, all utilities are required to include the broader customer-complaint reporting mandated by Minn. Rules 7820.0500, which specifies an annual May 1 filing showing total numbers of resolved and unresolved complaints by service class and complaint type, the total number of customers in each class, the number who initiated service during the past year, and the names, addresses, and phone numbers of personnel authorized to receive and respond to Commission requests and directives. Utilities must keep this contact information current, make it available for inspection, and provide updated details upon request or before hearings.

customer complaints, regardless of the issue or resolution. Additionally, higher overall consumer costs have driven customers to seek a deeper understanding of their household bills." More, MERC explained that call center representatives are trained to log when a customer calls back many times. When there is a repeat customer caller, a supervisor calls them back, and this call back is tracked as a complaint.[33]

Xcel explained that most complaints were related to accounts that were disconnected or received a disconnection warning; "The increase in this category for the year 2024 is attributed to economic conditions such as inflation, which impacted food, housing, and transportation costs, leading to a greater number of customers being eligible for disconnection and being disconnected."[34]

Department on method of complaint resolution:

The Department noted that the way utilities are resolving complaints is changing (Table 7). For example, the Department noted that CPE, GP, and MERC reported a decrease in the number of complaints resolved by "taking an action the customer and the utility agree is an acceptable compromise" compared to previous years. The Department also noted increases in complaints forwarded to the utility from the Commission Consumer Affairs Office (CAO) for CPE and Xcel.

Table 7. Department Analysis on Utility Complaints[35]

Utility	Forwarded by CAO	Method of Resolution
CPE	Complaints forwarded to CenterPoint by the CAO were 147% above the 10-year average.	Long-term decrease in complaints being resolved through an "agreement with the customer."
GP		Only 22% of complaints were resolved by reaching an "agreement with the customer," which is well below the 5-year average of 30%. No request was resolved by taking the customer requested action.
MERC		Only 17% of complaints by simply "agreeing" to customer requests—a 75% decrease from the 10-year average. Resolving complaints through a "compromise" jumped 226% above the 10-year average, and situations deemed

[33] MERC initial filing at 9

[34] Xcel initial filing at 10

[35] Docket No. 25-33, Department Comments, pp. 14-15; Docket No. 25-32, Department Comments, pp. 10; Docket No. 25-34, Department Comments, pp. 14; Docket No. 25-31, Department Comments, pp. 9-11

		"out of the Company's control" rose 48% above the historical average
Xcel	CAO complaints increased by nearly 345% between 2022 and 2024 (rising from 330 to 1,486).	

1. Staff Analysis

Staff confirm that utilities filed all required data for this section. Staff focus on 1) explaining the most common complaint type, by utility, 2) sharing information on relevant complaint proceedings, and 3) bringing attention to an issue identified by CAO.

Most common complaint type by utility:

The most common type of complaint for GP is payment arrangements, for MERC the most common type is billing errors, and CPE and Xcel most frequently received complaints about inadequate service. CPE defines inadequate service as the Company failing to meet customer expectations, including, for example, excessive hold time on the phone.

Following Staff's IR, Xcel explained how it defines sub-categories of inadequate service:

- Programs and Services (450 complaints): Notably, this includes disconnection-arrangement complaints made outside the CWR season, as well as concerns regarding Solar, My Account, Saver Switch, or marketing and rebates.
- Cold Weather Rule Protection (139 complaints): these are Credit & Collections complaints (such as shutoffs or disconnection notices) that specifically occur during the Cold Weather Rule (CWR) period from October 1st to April 30th.
- Field/Operations (102 complaints): involving physical field work, such as issues with stopped metering systems or meter setups/changes.
- Customer Service (6 complaints): like rude or discourteous employees, procedural errors, or slow response times on the phone.

More, staff asked Xcel to explain its attribution of the high volume of "Inadequate Service" complaints to economic conditions, inflation, and an increase in customer disconnections. Staff considered that there may be a degree of subjectivity in the categorization of complaints, as utilities may record complaints as "Wrongful Disconnection" and "High Bills," which may also capture the customer complaints Xcel references in its IR response. Xcel clarified that the "Inadequate Service" subcategories—which were implemented at the Commission's direction—actually contain a significant proportion of disconnection-related issues. Specifically, all 139 complaints under the "CWR Protection" subcategory and 391 of the 450 complaints under the "Programs and Services" subcategory were related to disconnections, credit, and collections. Therefore, Xcel maintained that its narrative, which attributed the complaints to economic hardship

and disconnections, is accurate. Staff now understand that categorizing disconnection complaints as a "service" problem may also be appropriate.

Other relevant proceedings:

The Commission is also focused on Xcel complaints in other dockets. Staff will continue to monitor trends in the number of complaints for MERC and Xcel in this docket and the other relevant proceedings discussed below, as available.

1. **QSP.** The Commission authorized a new docket to establish a performance-based regulatory framework focused solely on improving Xcel's customer service performance. The framework must incorporate the metrics in Xcel's QSP, but is not limited to them. The QSP metrics include a threshold for customer complaints to the PUC above which Xcel is charged a penalty.[36]
2. **Billing Errors Docket**. Since 2023, the Commission's Consumer Affairs Office (CAO) has observed a significant increase in billing error complaints from residential customers of Xcel Energy. These errors have impacted traditional residential customers and rooftop solar customers participating in the Solar Rewards program. In response, the Commission initiates an investigation into the recent increase in residential billing errors committed by Xcel Energy. In compliance filings, Xcel was required to explain the increase in billing errors and must report monthly on unresolved errors, new errors, and methods to correct and prevent errors.[37]

New issue from CAO

Staff consulted the CAO on several topics in this docket. The CAO informed staff that some utility call center agents either cannot or will not answer questions about billing charges, rates, and so on, and instead tell customers to contact the CAO. As a result, Call Center Response Times tend to reflect agents answering calls promptly but not addressing the customer's questions, leaving that responsibility to the CAO.

H. Gas Emergency Phone Line Answer Time and Gas Emergency Response Times

Utilities must report telephone answer times for their gas emergency phone lines. GMG does not have a dedicated telephone line for gas emergency calls; the Commission required GMG to report the total number of gas emergency calls received.[38] All utilities must also report the percentage of emergencies responded to within one hour and those that took more than one hour. Xcel, CenterPoint, and MERC must also report the average emergency response time, in minutes; MERC must report with and without farm tap

[36] Order Distributing Underperformance Payments and Opening New Docket issued January 9, 2026 in docket nos. E,G-002/CI-02-2034 and E,G-002/M-12-383 and ordering paragraph 8.

[37] Order initiating investigation issues September 10, 2025 in docket no. E,G-002/CI-25-341

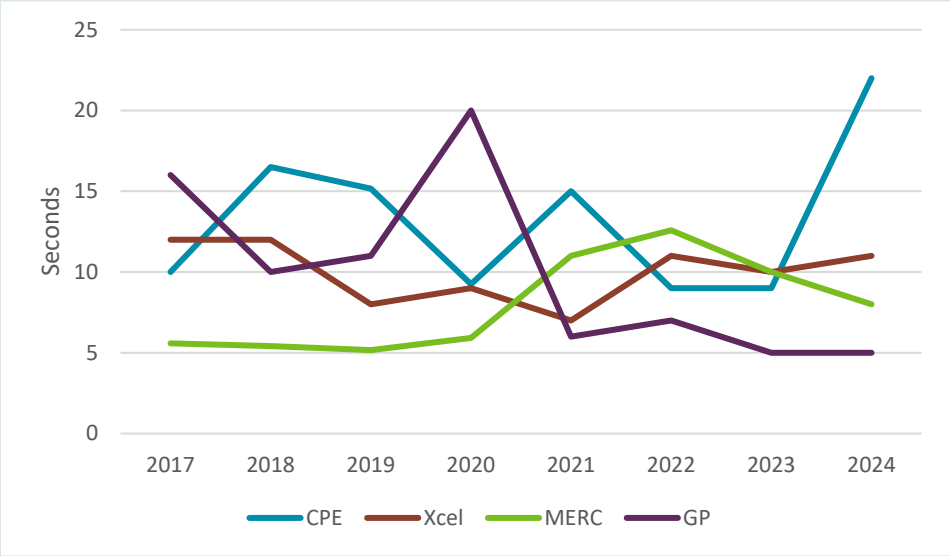
[38] Originally ordered in the Commission's January 18, 2011 Order, Docket 09-409, Order Paragraph 1j.

customers.[39]

Phone line answer times have been consistent for several years (Fig. 5). However, CPE's answer time increased compared to 2023. CPE reported a difficult July, when its Minnesota phone lines were overwhelmed with calls due to a hurricane in Texas. CPE resolved the issue once it was identified. Excluding July's data, CPE's average response time was seven seconds.

GMG had slightly fewer calls than last year.

Figure 5. Average Gas Emergency Call Answer Time



The average response time for technical crews to arrive at a gas emergency scene was similar to that in 2023. Nearly all crews reached the scene within an hour, 95% of the time. Only GMG was slightly below this, responding to 89% of emergencies within an hour.

GMG listed several strategies to improve response times, including reviewing staffing needs, enhancing emergency response training, ensuring technicians live in designated areas within GMG territories, and upgrading technology and communication systems.

Staff confirm that they have filed the required data for this requirement. Staff will monitor CPE's performance when analyzing 2025 data.

I. Excavation Damages

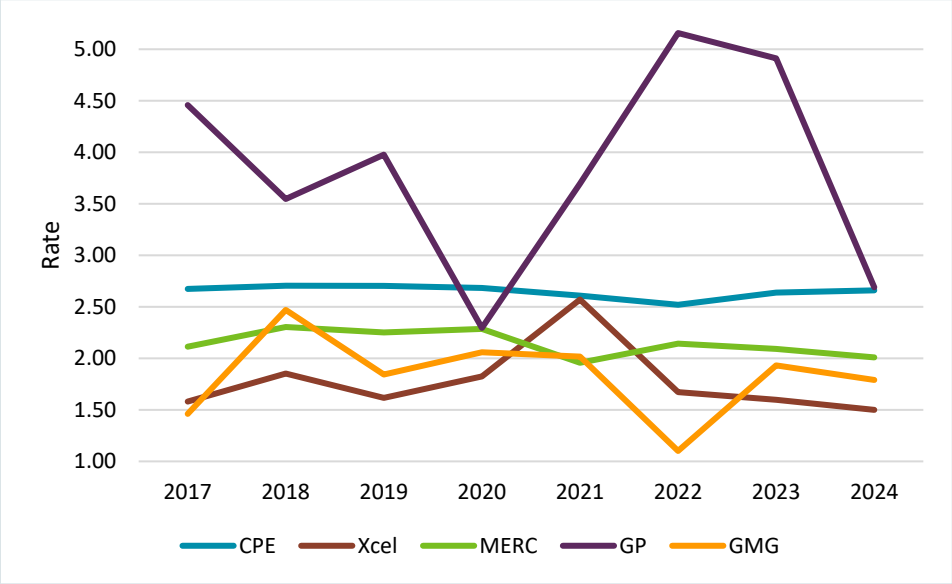
The Commission ordered utilities to report the number of excavation tickets received, the number of excavation damages observed, and the rate of excavation damages normalized

[39] Order issued February 9, 2018 in docket nos. G-011/M-16-371 and G-011/M-17-343

per 1,000 excavation tickets.[40] Utilities must also report the number of at-fault damages.[41] During the NGWG, utilities recommended reporting and cross-utility comparison of damages per 1,000 excavation tickets (Figure 6) and the number of at-fault damages.[42]

Excavation damage results showed that insufficient excavation practices were the leading cause of damage across all utilities, particularly due to digging before verifying marks and failing to maintain proper clearance. Additionally, locating errors, such as incorrect line marking, is a persistent issue. As such, excavation damage is sometimes not the fault of the utility and may not necessarily reflect service quality.[43]

Figure 6. Damages per 1,000 Excavation Tickets



1. Staff Analysis

Staff confirm that utilities filed all required data for this section.

At-fault damages. During the NGWG, utilities recommended reporting and cross-utility comparison based on the absolute number of at-fault damages (See Table 8). Staff find this measure useful for understanding the magnitude of the damage. Staff also believe it

[40]Previously, per the Commission's August 26, 2010 Order in Docket No. G999/CI-09-409, utilities were required to report mislocates and system damages; The Commission's Order on December 22, 2023, for Dockets No. G002, G022, G004, G011, G008/CI-22-548 updated to the current requirements. Staff note that while some naming conventions changed, such as renaming locate tickets to excavation tickets, the measurements remained the same. CPE previously reported only part of the excavation ticket counts. CPE clarified that its PHMSA data are complete; staff updated PUC records for full counts and comparability with other utilities. Staff use annual PHMSA reports and gas SQ filings for analysis and the briefing paper.

[41]An "at-fault damage" is a damage whose root cause is the responsibility of the utility or its contractors.

[42] NGWG docket no. G002, G022, G004, G011, G008/CI-22-548 meeting #2 slides filed April 26, 2023 at page 25.

[43] NGWG docket no. G002, G022, G004, G011, G008/CI-22-548 meeting #2 slides filed April 26, 2023 at page 20.

would be helpful to see the rate of at-fault damages, as at-fault damages per 1,000 tickets, so Staff included this in Figure 7 and show this value in Table 8. The rate allows for comparison of utility systems of different sizes. For example, the data shows that while GP had the highest rate of at-fault damages, this was based on just five total damage events.

Figure 7. At-Fault Damages per 1,000 Tickets

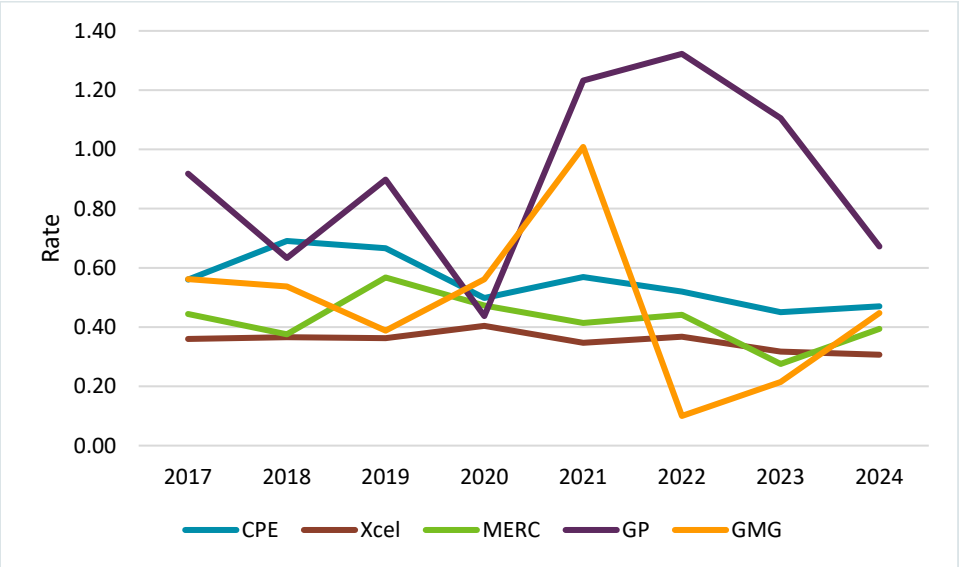


Table 8 shows the number of at fault damages and at-fault damages per 1,000 tickets, listed from greatest to least damage rate.

Table 8. At-Fault Damage Rate per 1,000 Tickets and Number of Damages in 2024

Utility	Total At-Fault Damages	Total Tickets	At-Fault Damage Rate (per 1,000)
Great Plains	5	7,436	**0.67**
CenterPoint	170	362,411	**0.47**
GMG	4	8,940	**0.45**
MERC	42	106,535	**0.39**
Xcel Energy	63	205,345	**0.31**

Regarding all damages, with at-fault damages being a subset, the Staff again found value in absolute numbers to gauge the magnitude of damages. For instance, although GP had the highest damage rate (Fig. 6), the actual number of damages was small—only 20 compared to CPE's 964 damages. Additionally, GP halved its damages from 40 in 2023 to 20 in 2024. See Table 9, listed from greatest to least damage rate.

Table 9. Damage Rate per 1,000 Tickets and Number of Damages in 2024

Utility	Total Damages	Total Tickets	Damage Rate (per 1,000)
Great Plains	20	7,436	**2.69**
CenterPoint	964	362,411	**2.66***
MERC	214	106,535	**2.01**
GMG	16	8,940	**1.79**
Xcel Energy	310	205,345	**1.51**

*CenterPoint's narrative summary shows a higher rate (2.66) based on 964 damages, while the PHMSA data (884 damages) indicates a rate of 2.44.

J. Service Interruptions

Utilities (excluding GMG) must report the number of service interruptions, categorized by whether they were caused by the utility's employees or contractors or resulted from any unplanned cause, along with the number of customers affected and the average duration of interruptions. GMG must report the number of unplanned service interruptions broken down by cause (such as low system pressure, third-party damage, and other causes), the number of customers affected by each outage, and the number of outages caused by GMG's employees or contractors.

During the NGWG, utilities argued against comparing outage data, noting that there is no way to standardize reporting, and many "outages" are only temporary interruptions caused by excavation damage and do not indicate a utility's service quality.[44] However, as discussed in the NGWG, in Delaware, average outage duration and frequency/rate are being compared.[45] See Figures 8 and 9.

- **CPE:** CenterPoint reported that interruptions impacted 2,991 customers. Of these, CPE caused 128 interruptions, averaging 186 minutes each. Others caused 563 interruptions, averaging 150 minutes each. CPE reported a 190% rise in employee-caused interruptions in 2023.
- **Xcel:** Xcel reported that interruptions impacted 604 customers. Of these, Xcel caused all 14 interruptions, lasting an average of 480 minutes. Others caused no interruptions. Staff note that this average was heavily influenced by a single 20-hour outage in October.
- **MERC:** MERC reported that interruptions impacted 687 customers. Of these, MERC caused 39 interruptions, averaging 226 minutes each. Others caused 167 interruptions, averaging 182 minutes each. Total service interruptions increased to 206 incidents, up from 183 in 2023. MERC attributed this rise, in part, to more mislocates by MERC's locating contractor. An outlier was an April outage that affected 240 customers after a contractor mistakenly shut off the gas flow on a

[44] NGWG docket no. G002, G022, G004, G011, G008/CI-22-548 meeting #2 slides filed April 26, 2023 at page 23.

[45] NGWG docket no. G002, G022, G004, G011, G008/CI-22-548 meeting #3 slides filed July 6, 2023 at slide 24.

single-feed system.

- **GP:** GP reported that interruptions impacted 103 customers. Of these, GP caused five interruptions lasting an average of 99 minutes. Others caused 12 interruptions, averaging 141 minutes each. The utility's total outages were below its 10-year average. GP experienced no outages during the winter heating months from November through April.
- **GMG:** GMG reported that interruptions impacted 15 customers. GMG reported 16 total interruptions, four of which were the fault of GMG's locating contractor, and the remainder were caused by other parties.

Figure 8. Interruption Duration, Company Fault

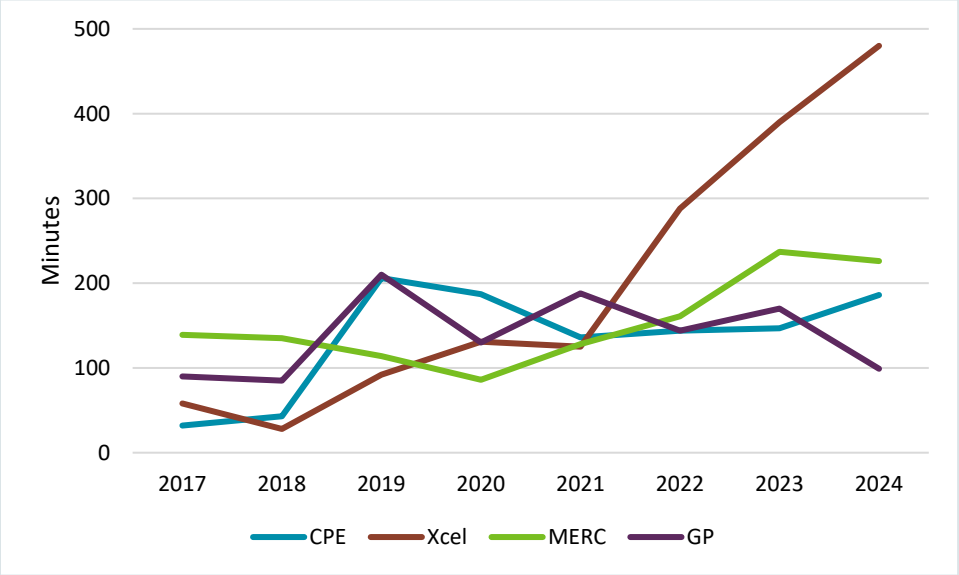
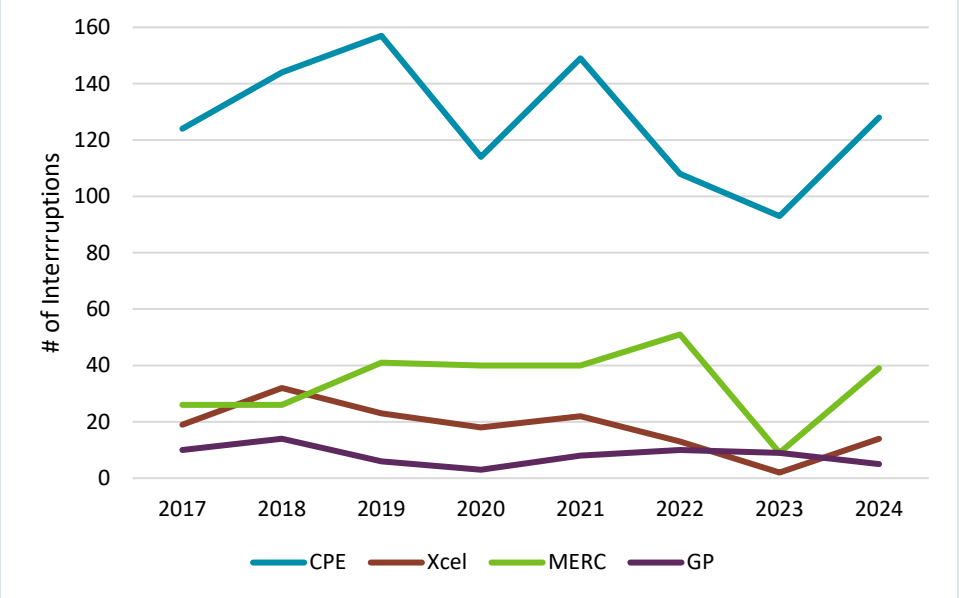


Figure 9. Interruption Count, Company Fault



1. Staff Analysis

Staff confirm that each utility has filed the required data and has performed additional analysis, highlighting relevant trends and information.

- **Xcel:** Xcel had the longest-lasting interruptions. Staff provide nuance to the single, annual value, shown above, by providing the table below. For example, in Table 10 below, May and October both have four incidents affecting over 100 homes, but the outage duration in October is 20.5 hours, which is about five times longer than in May. This skews the interruption duration data. Also noteworthy, the category for "Outages Due to All Other Causes" is zero across the board.

Table 10. Xcel Outages Due to Employees/Contractors by Month

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Number of Customers	0	90	0	0	185	0	87	3	0	239	0	0	604
Number of Outages	0	1	0	0	4	0	3	2	0	4	0	0	14
Avg Outage Time (Hrs)	0	5	0	0	4	0	6	3.5	0	20.5	0	0	8

- **CPE:** CPE had the greatest number of interruptions. CPE's data remained fairly consistent year-round, with only a small uptick in January/December (Tables 11a and 11b). CPE did not explain the quantity of outages but only reported the "Damage Caused Outages Due to All Other Causes" category as 79% of total damages caused.

Table 11a. CPE Outages Due to Employees/Contractors by Month

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Number of Customers	7	3	242	15	46	578	37	94	146	172	19	85	1,444
Number of Outages	2	3	2	7	12	24	15	13	21	16	10	3	128
Avg Outage Time (Hrs)	242	156	195	161	131	211	226	149	189	191	136	325	186

Table 11b. CPE Outages Due to All Other Causes by Month

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Number of Customers	6	19	8	49	192	164	216	190	160	378	150	15	1,547
Number of Outages	5	8	8	38	63	63	67	67	103	89	37	15	563
Avg Outage Time (Hrs)	168	163	98	147	164	201	107	155	163	131	145	115	150

- **MERC:** There were more interruptions in 2024 than in 2023, and more were caused by MERC employees/contractors. MERC noted that when employees are to blame, they take corrective action, including training to prevent future occurrences. Staff note that 21% of residential complaints were for service intervals.

K. Major Incident Reporting and MNOPS Violations

All gas utilities must summarize any major events that were immediately reportable to the Minnesota Office of Pipeline Safety (MNOPS) under MNOPS reporting criteria. Summaries

include a count of impacted customers and corrective actions taken.[46] Major incidents are events that occur and meet the reporting threshold.[47] See Figure 10.

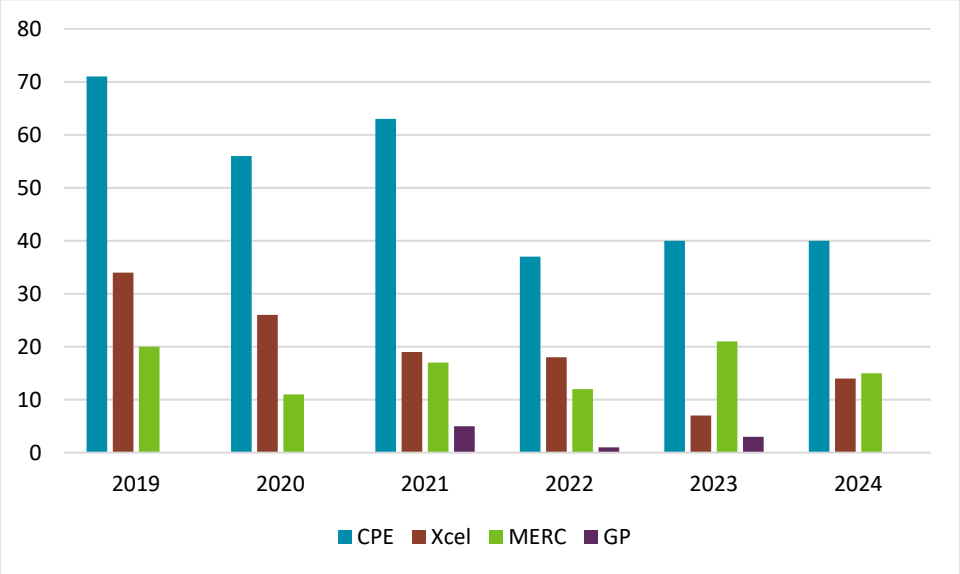
For MNOPS Violations, utilities must provide a summary of cited violations, including violation descriptions, remediation details, and violation counts by citation code. Violations are findings from inspections or investigations where compliance standards were not met.[48] See Figure 11.

In 2024, the most common major reportable events were caused by: Damaged Gas Main, Damaged Gas Service, and Fire. Notably, only CPE reported "fire," which accounted for about 20% of its major incident types.

Causes of MNOPS violations varied across utilities. The most common types include issues with locating underground facilities/locate deficiencies, missed surveys or inspections, gas mains not marked correctly, and excavation damage/pipeline failure – 3rd party damage.

- GP and GMG had no major reportable events in 2024.
- The Department requested GP report its progress in addressing the two safety violation letters it received (**Decision Option 5**). In reply comments, GP stated it would include the information in its 2026 Gas Service Quality Report.

Figure 10. Major Reportable Events



*GMG does not have any reportable interruptions. GP data is unavailable prior to 2021 and had no reportable

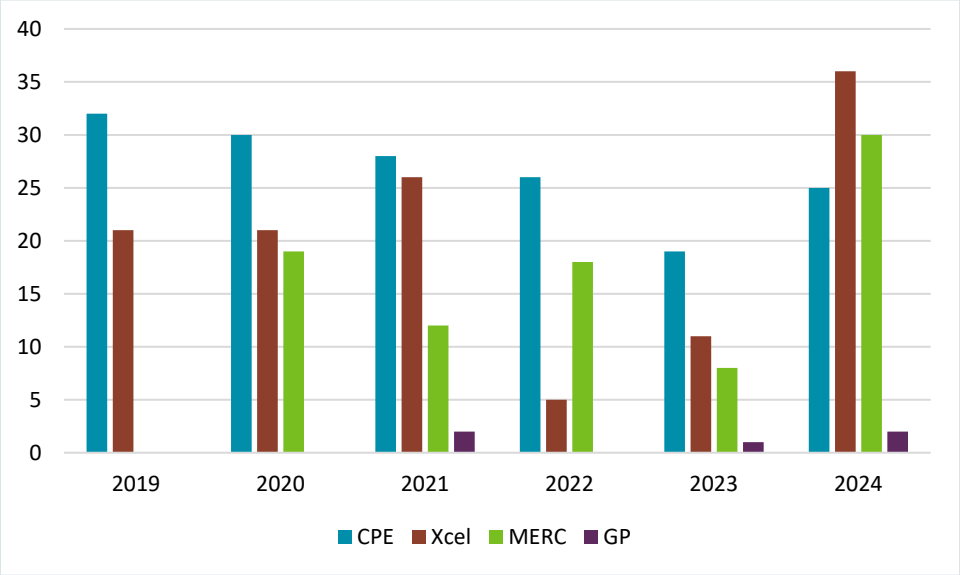
[46] The full summary includes: the event location, date, and time it occurred; number of impacted customers; how the company was notified of the incident and the root cause; the corrective actions taken to fix the problem; actions taken to notify or contact customers and any public relations or media issues; whether the customer or the company relit service; and the longest duration any customer was without gas service.

[47] Reporting threshold information: MNOPS Reportable Event Policy

[48] MNOPS Investigations Website

interruptions in 2024.

Figure 11. MNOPS Violations Letters



*GMG does not have any reportable interruptions. GP data is unavailable prior to 2021.

1. Staff Analysis

While Xcel (~$67,000) and MERC (~$30,000) reported fines for violations during their remediation efforts, CPE reported only the status of its remediation efforts, without mentioning fines. Fines might be of interest to Commissioners; it could be helpful to understand how these fines are paid and whether there are any impacts to customers.

Xcel, CPE, MERC, and GP received more MNOPS violation letters in 2024. Indeed, MnOPS violation letters increased by 139% across all utilities, suggesting heightened regulatory scrutiny and/or emerging compliance gaps. Conversely, reportable service interruptions remained relatively constant.

Staff confirm each utility has met the major incident reporting and MNOPS violation letter requirements for 2024.

L. Integrity Management Plan Reporting

Xcel, CPE, MERC, GP, and GMG must provide PHMSA Distribution Report data:[49]

- Miles of distribution mains
- Number of services
- For both mains and services,
    - number of leaks

[49] CPE previously had different requirements, first Ordered on January 7, 2020, in Docket Nos. G-022/M-19-304, G-002/M-19-305, G-008/M-19-300, G-011/M-19-303, and G-004/M-19-280. Later, the Commission allowed CPE to report the data recommended by the NGWG, effectively the same information as the other gas utilities, see December 26, 2024 Order in Docket No. G-008/M-24-33 at ordering paragraph 3.

- leaks by cause (including hazardous leaks)
- leaks per 1,000 miles of main or per 1,000 services.

Staff focus on leak data. Staff compare leak data per 1,000 services and per 1,000 miles of main to compare across utilities. Staff also use these values to compare a single utility's performance from 2017 to 2024. The year 2017 was chosen as the start time to allow for a comparison of pre- and post-pandemic periods.

Services: MERC, GP, and Xcel's service leaks per 1,000 services decreased from 2023 to 2024. CPE and GMG had the most leaks per 1,000 services. See Figure 12.

CPE: Concerning CPE's 34% increase in reported leaks, CPE explained that the increase results from the adoption of "advanced leak detection" technology, which is more sensitive and identifies more leaks than traditional methods. The Department stated that they will continue to monitor this trend to ensure that the higher numbers are solely due to the new technology.[50]

GMG: reported two main leaks and 92 service leaks. In 2024, GMG attributed 72 service leaks to equipment failures, which GMG explained as "regulators are continually exposed to the elements, their soft (rubber/plastic) components can degrade slightly over time. When those devices develop leaks as a result, it is more cost-effective to replace them rather than repair them. When a component is replaced, it becomes reportable on the PHMSA report."[51] Staff do not yet have historic leak data for GMG, but perhaps those data could explain the sharp increase in leaks from 2020 to 2022.

Mains: CPE, GP, and MERC's main leaks per miles of main decreased from 2023 to 2024. GMG's leaks increased but the value reported was similar to data shared from 2017 to 2023. Xcel's leaks per 1,000 miles of main increased from 2023 to 2024. See Figure 13.

Staff consider the context for leaks by providing PHMSA data on pipe characteristics. In 2024, most pipes and services were made of plastic (Table 12). All main and service leaks were caused by excavation damage or equipment failure. Most mains and services were installed between 1990 and 2019, except for in the case of MERC in which the installation date of most services was listed as "unknown." See Tables 13a and b.

Table 12. Pipe Type in 2024

Utility	Type	Cathodically Protected Coated Steel	Plastic	System Total
CPE	Miles of Mains	3,247.263 (21.9%)	11,520.924 (77.9%)	14,796.1
CPE	# of Services	37,920 (4.7%)	765,652 (94.8%)	807,599
MERC	Miles of Mains	1,380.92 (25.4%)	4,053.58 (74.6%)	5,434.5
MERC	# of Services	36,244 (15%)	205,790 (85%)	242,240
Xcel	Miles of Mains	738 (7.5%)	9,080.7 (92.3%)	9,840.0
Xcel	# of Services	4,281 (0.9%)	454,937 (97.7%)	465,551

[50] Docket No. 25-33, Department Comments, pp. 30.

[51] GMG initial filing at 9

Table 13a. Miles of Main and Number of Services by Date of Installation in 2024

Utility	Pipe	Pre-1960 and Unknown	1960-1989	1990-2019	2020+
CPE	Main	334.2	4,867.9	8,186.5	1,407.5
CPE	Service	5,829	234,765	483,396	83,609
GP	Main	115.5	97.1	208.2	53.4
GP	Service	2,174	6,810	11,126	3,126
MERC	Main	87.1	1,695.40	3,143.60	508.4
MERC	Service	129,092	3,921	85,750	23,477
Xcel	Main	476	1,801.60	6,808.70	753.6
Xcel	Service	22,593	98,306	309,519	35,133

Table 13b. Miles of Main and Number of Services by Date of Installation in 2024, (%)

Utility	Pipe	Pre-1960 and Unknown	1960-1989	1990-2019	2020+
CPE	Main	2.3%	32.9%	55.3%	9.5%
CPE	Service	0.7%	29.1%	59.9%	10.4%
GP	Main	24.4%	20.5%	43.9%	11.3%
GP	Service	9.4%	29.3%	47.9%	13.5%
MERC	Main	1.6%	31.2%	57.8%	9.4%
MERC	Service	53.3%	1.6%	35.4%	9.7%
Xcel	Main	4.8%	18.3%	69.2%	7.7%
Xcel	Service	4.9%	21.1%	66.5%	7.5%

Figure 12. Service Leaks per 1,000 Services

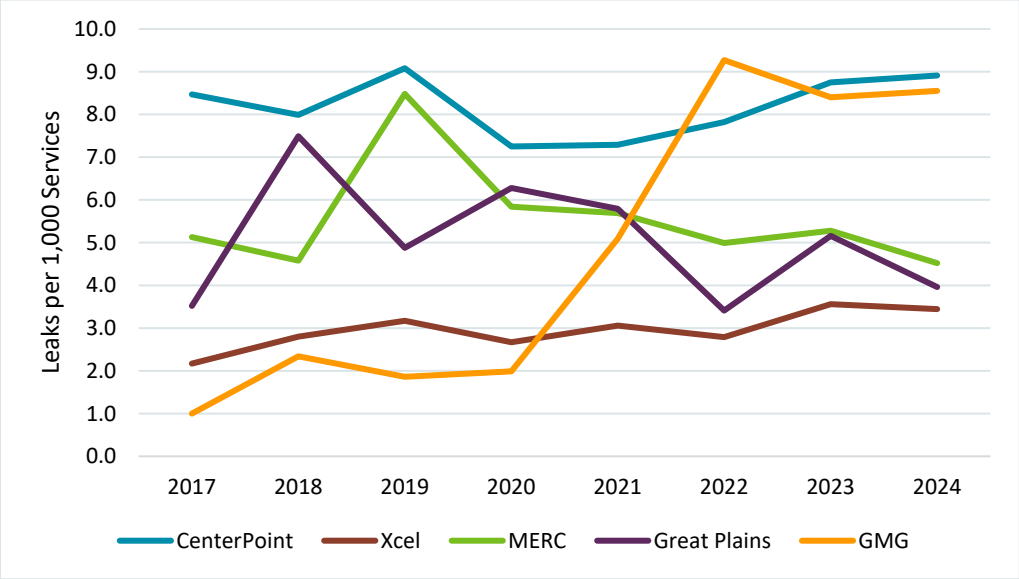
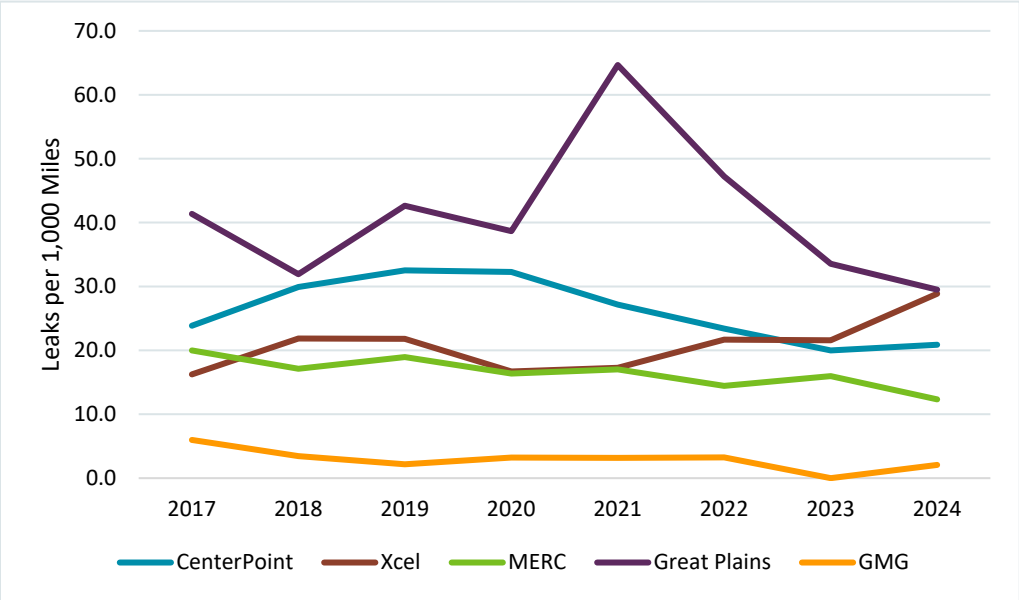


Figure 13. Main Leaks per 1,000 Miles of Main



One public comment was filed in all five dockets. "I'm most concerned about the constant flow of smaller leaks that go unnoticed and untested until they make themselves obvious… I urge you to require utilities to locate and eliminate all methane leaks in our system, prioritizing advanced leak detection and repair – and even strategic retirement – over expensive and often unnecessary pipeline replacements. Whether this takes the form of financial incentives, performance standards, or cost-benefit analysis requirements, your urgent action is needed to protect public safety and keep rates affordable."

1. Staff Analysis

Staff confirm that utilities filed all required data for this section. Staff also consider the context for leaks by providing a leak-detection method reported in gas integrated resource plan filings for Xcel, CPE, and MERC.[52] As mentioned by the Department above, CPE looks for more leaks, so one could understand that then, CPE finds more leaks. Xcel now has advanced methane leak detection (AMLD), so as it begins to use that technology, its detected leaks may increase correspondingly. Staff previously shared leak detection information[53] and includes a portion here:

Xcel conducts compliance surveys to detect all types of leaks; these are done every three years. Recently, the Commission approved Xcel's NGIA Advanced Methane Leakage

[52] Order Clarifying and Expanding Framework for Natural Gas Integrated Resource Planning issued October 28, 2024 in docket nos. G-008,G-002, G-011/CI-23-117 and G999/CI-21-565. See comprehensive IRP requirements paragraph 52 which included the requirement, "Within 12 months of the date of this order, each utility shall file a report including the capital and O&M costs of procedures for system specific leakage rates measurements and a description of their current practices."

[53] Briefing papers filed January 21, 2026, docket nos. E-999/CI-07-1199; E-999/DI-22-236; E-999/CI-14-643.

Detection (AMLD) pilot, including a single mobile detection unit.[54] Xcel's AMLD NGIA pilot begins in 2026 and will conduct super-emitter surveys to find the highest-emitting methane leaks. These surveys will be in addition to compliance surveys. Xcel's most recent gas rate case listed two additional, to NGIA, leak detection units.[55]

CPE has AMLD via the Picarro mobile unit, though the utility did not report how many units it uses. CPE conducts compliance surveys for leaks every three years per federal guidance in 49 CFR Part 192. More technicians walk areas with leaks detected by Picarro or that cannot be patrolled by Picarro.

MERC estimates methane emissions and conducts surveys to detect leaks, despite not measuring those leaks. MERC does not have AMLD.

M. EFV and Manual Shut-off Valves

This requirement confirms that all gas utilities verify the completion of customer outreach on Excess Flow Valves (EFVs), which automatically shut off gas during sudden high-flow events such as line breaks, and manual shut-off valves, which allow customers or responders to manually stop gas flow, pursuant to the Commission's July 31, 2019 Order in Docket No. 18-41. Xcel, CenterPoint, Great Plains, and GMG completed EFV outreach.

MERC has not completed its outreach. MERC must verify the total installed meter capacity on service lines with multiple meters before determining EFV eligibility for each customer. Service line mapping is mostly done, but some verification remains to confirm capacity-based EFV eligibility. The company will resume outreach in 2025 to multi-family and nursing facilities to provide EFV/manual shut-off info and installation options. MERC notes that these categories are difficult to verify and contact because customers are often listed by individual meters, which requires extra outreach. In earlier outreach to schools and hospitals, 26 customers expressed interest in EFV installation, 20 requested more information, 5 were ineligible after a capacity review, and 1 is pending. Outreach and installation follow-up are ongoing.

N. Web-Based Metrics

Starting with the 2024 reporting year (submitted in 2025), all gas utilities must include metrics on enterprise web and payment system availability and usage in their service-quality reports (Table 14). Metrics can be reported at the enterprise level, not the state level, and utilities must report logins across electronic customer communication platforms (including the enterprise website and mobile apps) at the enterprise level.

[54] Xcel NGIA Order, docket no. 23-518, issued May 16, 2025

[55] Xcel gas rate case docket no. 25-356 Berger testimony at 56

Table 14. Utilities' Web-Based Metrics in 2024

Company	Uptime Website	Uptime Payment Services	Website Visits	Logins
Xcel	100.00%	99.45%	11,890,711	13,585,218
CPE	98.54%	98.54%	22,895,981	4,856,337
MERC	99.99%	99.63%	567,509	1,630,165
GP	99.60%	99.60%	122,466	N/A
GMG	99.95%	Not Available	8,699	Not Available

Some of GMG's data is unavailable due to a change in billing software and the associated electronic payment vendor in 2024. GMG's new system offers a customer portal that allows users to access certain account information and manage some activities electronically.

Staff confirm that utilities filed all required data for this section.

CONCLUSION

Staff comment on each section of reporting and identify, where applicable, trends that will be monitored or explored in greater detail when 2025 data when filed on May 1, 2026. The Commission can accept utilities' reports with **Decision Option 1** and delegate authority to the Executive Secretary to create a comprehensive list of reporting requirements, to incorporate any new requirements dictated by Orders, with **Decision Option 2**.

A. **PHMSA Reports.** All utilities provided required data. To expedite analyses in future proceedings, staff request that utilities file PHMSA data in a machine-readable format (**Decision Option 3**).
B. **Call Center Response Times.** All utilities answered 80% of calls, or, in the case of Xcel, nearly 80% of calls, within 20 seconds. Xcel's call center performance is also being tracked in electric service quality and QSP proceedings. Staff introduced a decision option to eliminate reporting of IVR "zero-out" data after showing consistent customer use of the "zero-out" option over time. Differences across utilities highlight differences in IVR systems (**Decision Option 4**).
C. **Meter Reading Performance**. Most meters were read by the utility; very few were customer-read. All utilities except MERC read 99+% of meters. Xcel had 4,000 meters go unread for 12 months or more; however, this was fewer meters unread than in 2023. Xcel explained that meters went unread when Xcel was unable to collect a reading in previous months due to customer-related issues. Xcel intends to have full deployment of AMI meters substantially complete by the end of 2025. Staff will monitor unread meters, but expects the number to decline with full installation of AMI.
D. **Involuntary Service Disconnections**. Overall, utilities sent fewer disconnection notices, and CPE, MERC, and GP disconnected fewer customers. Xcel, however,

disconnected more customers. This may be explained by Xcel's use of remote disconnection and reporting values for gas and electric customers. Staff also intends to monitor the number of customers enrolled in CWR and EAP protections, as well as monitor federal funding status of EAP.

E. **Service Extension Requests.** Staff will monitor time for new commercial installations for Xcel, which Xcel attributed to the complexity of installations, as well as examine how this trend of increased complexity is impacting other utilities. Staff will also monitor utilities where time to reconnect previously served customers increased- CPE (commercial) and Xcel (residential and commercial).
F. **Customer Deposits.** While no utility altered its official customer deposit policy in 2024, staff notes that utilities are charging customers a wide variety of other costs under different names (such as reconnection fees, down payments, and late penalties) to restore service. Staff is tracking fees as discussed in several proceedings currently before the Commission.
G. **Customer Complaints.** Staff will monitor trends identified in 2024: resolving most complaints upon initial inquiry, complaint type, and increased complaints for MERC and Xcel. More, staff will monitor the decreased resolution of complaints with "compromise," as identified by the Department, as well as an increase in complaints forwarded to the utility from the Commission Consumer Affairs Office (CAO) for CPE and Xcel. The latter issue may align with information from the CAO in which call center agents cannot or will not answer customer questions and instead direct those customers to CAO.
H. **Gas Emergency Phone Line Answer Times and Gas Emergency Response Times.** Staff will monitor CPE's answer time, given that its 2024 performance was reported to be the impact of a storm in July.
I. **Excavation Damages.** Staff will monitor trends in performance for at-fault damages per 1,000 tickets for GP (decreasing since 2022) and GMG (increasing since 2022), as well as damages per 1,000 tickets for GP (decreasing since 2022). GP performance has been improving (decreased damage rate), though GP still has the highest rate of damages across the five gas utilities.
J. **Service Interruptions.** Staff note that Xcel had a single interruption, which appears to have impacted the reported average duration. Staff will examine performance next year and consider impact to the average interruption duration, which has been increasing since 2021. In 2024 and historically, CPE reported the greatest number of interruptions compared to the other gas utilities. Staff could not identify a single event that may have led to the 2024 value as there are outages each month, with the most in the summer months. Staff will use 2025 data to prepare a more in-depth analysis.
K. **Major Incident Reporting and MNOPS Violations.** Utilities, besides GMG, received more violations in 2024 than previous years. Staff will monitor in 2025 data. Staff can provide a more detailed analysis of MNOPS reports and violations and compare these to service interruptions when 2025 data are received.
L. **Integrity Management Plan Reporting (Leaks).** CPE reported a 34% increase in leaks, attributed to advanced detection. To this extent, staff will monitor CPE's as

well as Xcel's reported leaks, as Xcel also improves its leak detection with AMLD. Staff are very interested in leak data, overall, and look forward to more in-depth analyses, including the 2025 data.

M. **EFV and Manual Shut-off Valves.** MERC is the only utility remaining to complete this outreach and accompanying reporting. Staff will review MERC's progress in 2025.

N. **Web-Based Metrics.** All utilities provided required data. Staff will compare to call volume in 2025 data analyses to understand the relative importance of telephone calls versus online provision of utility service.

DECISION OPTIONS

1. Accept the 2024 Gas Service Quality Annual Reports filed by Xcel Energy, CPE, MERC, GP, and GMG on May 1, 2025. (Utilities and Department)

2. The Commission authorizes the Executive Secretary to create a "Comprehensive Gas Service Quality Reporting Requirements" document, which reconciles the existing gas service quality reporting requirements and the additions and modifications to those requirements made above. The Commission also delegates continuing authority to the Executive Secretary to update the Comprehensive Gas Service Quality Reporting Requirements document to reflect any future modifications or additions to the reporting requirements established in future Commission decisions, to be filed as an attachment to future orders establishing such changes. (Staff)

3. Require gas utilities to include machine-readable PHMSA reports in all service quality filings beginning with the reports filed in 2026. (Staff)

4. Allow CPE to stop reporting IVR data. (Staff)

5. Require Great Plains to report progress on its compliance with the two MNOPS letters in its Gas Service Quality report in its 2025 data filed in 2026. (Department)