

June 1, 2015

Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> 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-15-390

Dear Mr. Wolf:

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

2014 *Annual Gas Service Quality Report* (Report) submitted by Great Plains Natural Gas Company, a Division of MDU Resources Group, Inc. (Great Plains or the Company).

The Report was filed on April 30, 2015 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' Report, the Department recommends that the Minnesota Public Utilities Commission (Commission) **accept** the Company's Report pending Great Plains' response in *Reply Comments*.

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

Sincerely,

/s/ MICHELLE ST. PIERRE  
Financial Analyst  
651-539-1835

MS/ja  
Attachment

**BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

**COMMENTS OF THE  
MINNESOTA DEPARTMENT OF COMMERCE  
DIVISION OF ENERGY RESOURCES**

**DOCKET No. G004/M-15-390**

**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 Resources<sup>1</sup> (Department) and all Minnesota regulated natural gas utilities in Docket No. G999/CI-09-409 (09-409 Docket).<sup>2</sup> As a result, the gas utilities file annual reports on various service quality standards.

On April 30, 2014, Great Plains Natural Gas Co. (Great Plains, GP, or the Company) filed its calendar year 2014 *Annual Service Quality Report* (2014 Report). This is the fifth annual report filed by Great Plains.

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

**II. DEPARTMENT ANALYSIS**

In its January 18, 2011 *Order* in the 09-409 Docket (09-409 *Order*), the Commission allowed Great Plains to delay providing certain information regarding various service quality metrics until the calendar year beginning January 1, 2011. As such, this Report marks the fourth full calendar year for which the Company has provided data for all of the Commission's service quality reporting metrics.<sup>3</sup>

Each year, the Department analyzes the information provided in the Report in the context of past reports. Overall, the Department identified no major concerns regarding Great Plains' 2014 Report. However, as discussed below in Section II.J below, the Department requests that Great Plains provide a discussion in *Reply Comments* regarding the reasons for the

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

<sup>2</sup> Great Plains filed its 2010 Report in Docket No. G004/M-11-363, its 2011 Report in Docket No. G004/M-12-442, its 2012 Report in Docket No. G004/M-13-366, and its 2013 Report in Docket No. G004/M-14-332.

<sup>3</sup> As discussed in Section F below, Great Plains provided a new schedule for customer complaints.

significant increase in duration of service interruptions during July, August, and October of 2014. The Department provides further detail on each reporting metric by discussing each separately below.

**A. CALL CENTER RESPONSE TIME**

Minnesota Rules, part 7826.1200<sup>4</sup> requires Minnesota's electric utilities to answer 80 percent of calls made to the business office during regular business hours within 20 seconds. Consistent with this requirement, the Commission required the regulated gas utilities to provide in their annual service quality reports the call center response time in terms of the percentage of calls answered within 20 seconds.

As shown in Table 1 below, Great Plains was able to answer 80 percent, or more, of calls within 20 seconds, with an average of 87.50 percent of calls being answered within 20 seconds even though the number of calls increased by 4,612 calls from 25,854 to 30,466.

**Table 1: Call Center Response Time**

	12 Mo. Avg.	Avg. Speed (Seconds)	# of calls
2010 <sup>5</sup>	n/a	n/a	n/a
2011	88.33%	35.00	21,109
2012	89.33%	12.75	24,571
2013	84.92%	21.25	25,854
2014	87.50%	18.42	30,466

**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.<sup>6</sup>

As shown in Table 2 below, Great Plains reported an average number of active meters on the system as 21,812 in 2014, an increase of 184 from the number reported in 2013. The vast majority of the Company's customers<sup>7</sup> were able to have their meters read by the Company (99.91 percent). Comparing these figures to previous years, the average number of meters has increased, and the proportion of those read by the Company has stayed at 99.91 percent. Also, meter reading staffing levels stayed at 10 employees in 2014, and the Company has not employed automatic meter reading in its service area. Further, Great Plains reported no meters unread for more than six months for all of calendar year 2014.

<sup>4</sup> Titled *Call Center Response Time*.

<sup>5</sup> This requirement was applied beginning with the Company's second (calendar year 2011) service quality report. Thus, not applicable (n/a) is used for 2010.

<sup>6</sup> Titled *Reporting Meter Reading Performance*.

<sup>7</sup> Great Plains reported that as of December 31, 2014, the Company had 21,446 customers (18,451 residential, 2,844 commercial/industrial, and 151 interruptible). See GP's Sch. 6, page 8.

**Table 2: Meter Reading Performance**

	Avg. # of Meters	Company Reads	Customer Reads	Avg. # not Read in over 6 mo.	Staff Level
2010 <sup>8</sup>	n/a	n/a	n/a	n/a	n/a
2011	21,375	99.92	0.08	0	7
2012	21,506	99.86	0.09	0	8
2013	21,628	99.91	0.09	0	10
2014	21,812	99.91	0.09	0	10

**C. INVOLUNTARY SERVICE DISCONNECTIONS**

The Commission's 09-409 *Order* required the Company to provide involuntary service disconnection information as submitted under Minnesota Statutes §§ 216B.091 and 216B.096 which relate to the Cold Weather Rule (CWR).

As shown in Table 3, the Company reported 1,227 involuntary disconnects in 2014, an increase of 67 from the number involuntary disconnects reported in 2013 (1,160). Over the last four years 4,773 involuntary disconnections have been reported by the Company, 2,065 of which have come in the months of May and June (43 percent) coinciding with the termination of the CWR in April.

**Table 3: Involuntary Service Disconnections**

	Disconnect Notices Sent	# of CWR Requests	CWR Requests Granted	% CWR Granted	Involuntary Disconnects	% Restored in 24 hrs.
2010	8,618	n/a	n/a	n/a	n/a	n/a
2011	7,911	30	30	100 %	1,293	100 %
2012	13,726	22	22	100 %	1,093	100 %
2013	18,868	29	29	100 %	1,160	100 %
2014	18,711	10	10	100 %	1,227	100 %

**D. SERVICE EXTENSION REQUESTS**

In its 09-409 *Order*, the Commission required Great Plains to provide in its annual report, service extension request information in the same manner as described in Minnesota Rule 7826.1600,<sup>9</sup> items A and B, except for information already provided in Minnesota Statutes §§ 216B.091 and 216B.096, subd. 11.<sup>10</sup> Two sets of data are presented in the report, one for new service extensions to properties previously not connected to the utility's system, and the second regarding connections of those properties previously connected to the system.

<sup>8</sup> Great Plains began reporting this metric in 2011.

<sup>9</sup> Titled *Reporting Service Extension Request Response Times*.

<sup>10</sup> Titled *Reporting*.

As shown in Table 4, in 2014 the Company had 146 new residential connections and 39 new commercial connections. Based on the weighted average, it took Great Plains about 22 days to extend service to new residential customers and 33 days to extend service to new commercial customers. Residential new connections decreased by two days and commercial increased by 15 days. In its Report, the Company explained that the number of days to extend service to a new address represents the time from receipt of the service line application to the date the meter was installed. As such, Great Plains' reported new service extension intervals include delays occurring that are outside the Company's control.

**Table 4: Service Extension Requests (New Customers)**

	Residential		Commercial	
	# of Installations	Weighted Avg. # of Days to Complete	# of Installations	Weighted Avg. # of Days to Complete
2010	107	29	32	20
2011	3,646	6	84	11
2012	121	24	45	25
2013	132	24	31	18
2014	146	22	39	33

As shown in Table 4(a) below, in 2014 there were 1,569 residential and 272 commercial or a total of 1,841 service requests from previously served customers. The weighted average number of days to complete these requests was one day for both residential and commercial requests. These totals represent an increase in the number of existing extension requests from the 1,819 reported in 2013, and identical interval times (1 day in both years).

**Table 4 (a): Service Extension Requests (Previous Customers)**

	Residential		Commercial	
	# of Installations	Weighted Avg. # of Days to Complete	# of Installations	Weighted Avg. # of Days to Complete
2010	0	0	1857	1
2011	354	7	16	8
2012	1,047	1	679	1
2013	1,548	1	271	1
2014	1,569	1	272	1

**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. In each of Great Plains' previous reports, the Company indicated that no customers were required to make a deposit as a condition of receiving new service.

**F. CUSTOMER COMPLAINTS**

The Commission's 09-409 *Order* required Great Plains to provide the total number of complaints received and the number of complaints resolved for each of seven complaint categories. Prior to 2013, Great Plains included in its data only calls escalated to a supervisor for resolution or forwarded to the Company by the Commission's Consumer Affairs Office (CAO). The Company provided some of the required data for 2013 and 2014 as well as a new schedule "to demonstrate the Company's continued effort towards meeting the requirements of the reporting metric for all calls, not just calls escalated to a supervisor for resolution."<sup>11</sup>

Regarding calls escalated to a supervisor for resolution in 2014, as shown below in Table 5 Great Plains reported 21 complaints or 7 less than the 28 complaints reported for 2013. Two of the 21 complaints were forwarded to the Company by the CAO. Great Plains also provided data on the amount of time needed to resolve complaints. Eighty six percent (18 of 21) of the complaints reported by Great Plains were resolved upon initial inquiry.

**Table 5: Escalated Customer Complaints**

	# of Complaints Escalated	# From CAO to GP	% Resolved on Initial Inquiry
2010 <sup>12</sup>	n/a	n/a	n/a
2011	7	1	86%
2012	16	0	100%
2013	28	1	96%
2014	21	2	86%

Further, Table 5(a) below shows that of the 21 complaint calls that were escalated to a supervisor for resolution in 2014, the Company indicated that there were no instances where the Company took the action the customer requested. Three complaints were resolved through compromise with the customer, 14 complaints were resolved through demonstration that the situation was beyond the control of the Company. In four instances, Great Plains refused the customer's request. The percentages by complaint category are as follows:

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<sup>11</sup> Filing, page 3.

<sup>12</sup> Great Plains began reporting this metric in 2011.

**Table 5(a): Escalated Customer Complaints by Resolution Type**

	% Agree with Customer Action	% Compromise with Customer	% Demonstration	% Refuse Customer's Request	% Not Assigned
2010 <sup>13</sup>	n/a	n/a	n/a	n/a	n/a
2011	0%	57%	0%	29%	14%
2012	13%	50%	0%	19%	19%
2013	0%	4%	4%	0%	93%
2014	0%	14%	67%	19%	19%

Beginning in 2014, Great Plains' agreed to include all calls in the data received by the customer service center that were determined to be indicative of a concern and/or complaint rather than only the calls that were escalated to a supervisor. Great Plains' customer complaint data for 2014 by complaint category is shown in Table 5(b):

**Table 5(b): All Customer Complaints by Resolution Type**

	# of Complaints	% Agree with Customer Action	Compromise with Customer	Demonstration	Refuse Customer's Request
2014	2,309 <sup>14</sup>	33%	10%	52%	5%

**G. GAS EMERGENCY CALLS**

In its 09-409 *Order*, the Commission required Great Plains to provide information regarding the Company's emergency line response time. The Commission additionally required Great Plains to provide an explanation regarding its expectations for answer times and procedures employees currently follow for handling emergency calls. All utilities participating in the Service Quality Reporting Workgroup<sup>15</sup> 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.<sup>16</sup> Therefore, the 2014 Report marks the fourth year that the Company has provided this data. Great Plains stated that it has an internal performance goal of at least 80 percent of calls answered within 20 seconds.<sup>17</sup>

<sup>13</sup> *Id.*

<sup>14</sup> Great Plains noted that this number does not reflect all calls by type and resolution for 2014 but is provided to demonstrate the Company's continued effort towards meeting the requirements for all calls. Filing, page 3.

<sup>15</sup> Great Plains participated in the Service Quality Reporting Workgroup which met on June 22, 2012.

<sup>16</sup> Prior to 2011, Great Plains tracked emergency line response times as the percentage of calls answered within 30 seconds.

<sup>17</sup> Filing, page 5.

In 2014, Great Plains was able to answer 78.89 percent of its emergency line calls within 20 seconds, which does not meet its internal goal or the prescribed 80 percent in 20 seconds standard for electric utilities. Further, Great Plains' 2014 performance was a drop of 4.59 percent from the 83.47 percent level reported for 2013. The Company was able to answer at least 80 percent of gas emergency calls within 20 seconds in 6 of the 12 months of 2014, a decrease over the 10 months in which this goal was met in 2013. In the months where Great Plains was unable to meet the goal, it reported the following performance levels:

- January, 79.34 percent;
- February, 74.19 percent;
- May, 75.94 percent;
- September, 77.19 percent;
- October, 73.86 percent; and
- November, 70.23 percent.

As shown in Table 6 below, Great Plains reported 1,702 total emergency calls in calendar year 2014, an increase from the 1,421 reported in 2013. The Company also reported an annual average speed of answer of 19 seconds per call for 2014, an increase of 3 seconds per call over the 16 second average in 2013.

**Table 6: Gas Emergency Calls**

	# of Gas Emergency Calls	Average Response Time	% of Calls Answered in 20 Seconds or Less
2010	582	n/a	n/a
2011	1,683	34	79.97%
2012	1,437	13	83.75%
2013	1,421	16	83.47%
2014	1,702	19	78.89%

On a monthly basis, the Company has not reported a month with average answer times in excess of 20 seconds in either 2011 or 2012. In 2013, Great Plains had two months, October and November, in which both months averaged well over 20 seconds (35 and 25 seconds, respectively). The 35 seconds in October 2014 was almost the same as October 2013. In the 2013 Report, the Department requested that Great Plains address the factors impacting its speed-of-answer performance in October (36 seconds) and December (28 seconds) 2013. Great Plains replied that the increase in the Average Speed of Answer observed in those months was mainly attributable to the unexpected increase in call activity that occurred on select weekends which may occur due to weather related or outage events.<sup>18</sup> According to the Company, during these limited circumstances, dedicated

<sup>18</sup> Great Plains May 30, 2014 Reply Comments, page 2, Docket No. G004/M-14-332.



customer service representatives may be asked to assist in responding to customer calls outside of their normal responsibilities.<sup>19</sup> Further, the Company stated that it was committed to providing quality customer service to its customers at all times and would continue to monitor this metric and implement any necessary measures to ensure that a timely response is provided to its customers at all times.<sup>20</sup>

While the Company's overall performance is close to the goal of 80 percent of calls answered in less than 20 seconds, the Department encourages Great Plains to improve its gas emergency call response time on a monthly basis too.

#### H. GAS EMERGENCY RESPONSE TIME

Regarding the response time to reported gas emergencies, the Company had 159 total calls to the gas emergency phone line in 2014, a decrease from the 289 calls (45 percent) in 2013.<sup>21</sup> Of the 159 calls, Great Plains was able to respond to 149 (93.71 percent) within one hour, and averaged 20 minutes in 2014.<sup>22</sup> These figures represent an increase over the 17-minute average response time in 2013 and a decrease in the number of calls responded to within one hour, down from the 97.23 percent in 2013. This data is shown in Table 7.

**Table 7: Gas Emergency Response Time**

	Calls Received	% Calls Responded to in <1 hour	% Calls Responded to in >1 hour	Avg. Response Time (minutes)
2010	582	96.22%	3.78%	n/a
2011	506	98.42%	1.58%	17
2012	367	99.73%	0.27%	14
2013	289	97.23%	2.77%	17
2014	159	93.71%	6.29%	20

The Company had six months where the response time exceeded 20 minutes (February through May, September, and November). The Department encourages Great Plains to continue efforts to improve their monthly average gas emergency response time and the percent of emergency calls responded to in one hour or less.

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<sup>19</sup> *Id.*

<sup>20</sup> *Id.*

<sup>21</sup> The reporting metric is the elapsed time between the time Great Plains was first notified of the emergency and the time that a qualified emergency response person arrives at the incident location and begins to make the area safe. Filing, page 3.

<sup>22</sup> According to Great Plains, the Company reports all calls coded as emergency calls including fire, gas odor, and line hits. Filing, page 3.

**I. MISLOCATES**

The Commission's 09-409 *Order*, required Great Plains 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.

As shown in Table 8, Great Plains reported 8 mislocates in 2014, a decrease from the 14 mislocates in 2013. Great Plains received 7,397 locate requests in 2014 for a total mislocate rate of 0.10 percent. The mislocates in 2014 were comprised of 4 non-marked lines and 4 mis-marked lines.

**Table 8: Mislocates**

	# of Locates	# of Mislocates	% of Mislocates	Mislocates per 1,000 Tickets
2010	7,230	1	0.01%	0.14
2011	7,676	6	0.12%	0.78
2012	7,490	1	0.02%	0.13
2013	6,867	14	0.18%	2.04
2014	7,397	8	0.10%	1.08

**J. DAMAGED GAS LINES**

The Commission's 09-409 *Order* required Great Plains to provide summary data on the number of gas lines damaged, including the number of lines damaged by the utility's employees or contractors, or any other unplanned cause.

As Shown in Table 9 below, in 2014 Great Plains experienced 38 instances of damage to its gas lines, a decrease of 3 from the 41 reported damages in 2013. Of the 38 damage events, 5 (13 percent) were caused by Great Plains or the Company's contractors and the remaining 33 were caused by unplanned causes. Additionally, the Company had 519 miles of line in 2014, for a ratio of 7.32 damage events per 100 miles of line. The 2014 ratio represents a decrease from the 2013 damage ratio of 7.96. The miles of line on Great Plains' system have been fairly constant from report to report.

**Table 9: Damaged Gas Lines**

	Utility	Unplanned Causes	Total	Miles of Line	Damage/100 Line Miles
2010 <sup>23</sup>	n/a	n/a	n/a	n/a	n/a
2011	2	28	30	507	5.92
2012	14	54	68	522	13.03
2013	9	32	41	515	7.96
2014	5	33	38	519	7.32

<sup>23</sup> 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.

Great Plains is also required to provide the same information provided to the Minnesota Office of Pipeline Safety (MNOPS) detailing the root cause of the events and the type of infrastructure involved (i.e., transmission, distribution). Damage on the Company's system was limited to its distribution network during 2014. The majority of damage incidences were related to the following categories:

- Marks Not Maintained By Excavator (14);
- Locates Were Not Requested (5);
- No Hand Digging / Hit While Excavating (5);
- Not Marked (4); and
- Mis-Marked (4).

**K. SERVICE INTERRUPTIONS**

In its 09-409 *Order*, the Commission required Great Plains to provide summaries of all service interruptions caused by system integrity pressure issues and summary information about major incidents based on MNOPS incident reports.

Table 10 below shows that in 2014, Great Plains reported 29 service interruptions. Of the 29 interruptions reported in 2014, 3 were caused by Great Plains, with the remainder caused by other causes.

**Table 10: Service Interruptions**

	Outages Caused by Utility	Outages Unplanned Causes	Total Interruptions	Customers Affected	Average Duration (minutes)
2010 <sup>24</sup>	n/a	n/a	n/a	n/a	n/a
2011	22	3	25	113	142
2012	13	35	48	115	167
2013	79	22	29	221	203
2014	3	26	29	123	798

The Department notes that in 2014, while there were the same number of interruptions as in 2013, there were more customers affected by those outages (798 in 2014 as compared to 203 in 2013). The monthly data shows that July, August, and October had average durations of 3,330, 3,180, and 1,030 minutes, respectively. During those same months, the number of customers affected were 10, 24, and 49, respectively. The Department requests that Great Plains provide a discussion in *Reply Comments* regarding the reasons for the significant increase in duration of service interruptions during July, August, and October of 2014.

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<sup>24</sup> Great Plains filed 2010 service interruption data, but explained 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.

**L. MNOPS REPORTABLE EVENTS**

The 09-409 *Order* also required Great Plains to provide summaries of all major events that are immediately reportable to the MNOPS and provide contemporaneous reporting of these events to both the Commission and Department when they occur. In its 2014 Report, Great Plains stated that “There were no service interruptions reportable to MNOPS in 2014.”<sup>25</sup>

**Table 11: MNOPS Reportable Events**

	Reportable Interruptions
2010	0
2011	3
2012	0
2013	1
2014	0

**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, plus payroll taxes and benefits.

As shown in Table 12 below, in 2014, Great Plains reported total service quality related O&M expenses of \$362,198, representing an decrease of \$2,319 from the 2013 figure of \$364,517. On an average basis, the Company’s 2014 O&M expenses were approximately \$30,183 per month. The Department did not observe any significant shifts in costs between months and notes that the change is minimal in monthly expenses between 2010 and 2014.<sup>26</sup>

**Table 12: Customer Service Related O&M Expenses**

	O&M Total	O&M Average/Month
2010	\$367,196	\$30,600
2011	\$349,451	\$27,121
2012	\$347,607	\$28,967
2013	\$364,517	\$30,376
2014	\$362,198	\$30,183

<sup>25</sup> Filing, page 4.

<sup>26</sup> Great Plains’ last general rate case as filed in Docket No. G004/GR-02-1682.

### III. SUMMARY AND CONCLUSIONS

Based on its review of Great Plains' 2014 *Annual Service Quality Report*, the Department recommends that the Commission accept Great Plains' Report pending the Company's response in *Reply Comments*. The Department requests that Great Plains provide a discussion in *Reply Comments* regarding the reasons for the significant increase in duration of service interruptions during July, August, and October of 2014.

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## **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-15-390**

**Dated this 1<sup>st</sup> day of June 2015**

**/s/Sharon Ferguson**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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