MINNESOTA
PUBLIC UTILITIES COMMISSION

Staff Briefing Papers

Meeting Date	December 21, 2023		Agenda Item 2*

Company	Xcel Energy, CenterPoint Energy, Minnesota Energy Resources Co. Great Plains, and Greater Minnesota Gas.
Docket No.	**Xcel Energy G-002/M-23-77** **CenterPoint Energy G-008/M-23-79** **Minnesota Energy Resources Co. G-011/M-23-80** **Great Plains G-004/M-23-78** **Greater Minnesota Gas G-022/M-23-81** **In the Matter of Xcel Energy's, Center Point Energy's, Greater Minnesota Gas', Great Plains', and Minnesota Energy Resources' Service Quality Report**
Issues	Should the Commission accept Xcel Energy's, CenterPoint Energy's, Greater Minnesota Gas', Great Plains', and Minnesota Energy Resources' 2022 Service Quality Reports?
Staff	Trey Harsch Trey.harsch@state.mn.us 651-201-2232

✓ **Relevant Documents**	**Date**
Xcel Energy (Docket No. 23-77)	
Xcel Energy 2022 Natural Gas Service Quality Report	05/01/2023
Department of Commerce Comments	09/08/2023
Xcel Energy Reply Comments	09/15/2023
CenterPoint Energy (Docket No. 23-79)	
CenterPoint 2022 Natural Gas Service Quality Report	05/01/2023
Department of Commerce Comments	09/28/2023

✓ Relevant Documents	Date
CenterPoint Reply Comments	10/06/2023
PUC Ex Parte Communication	11/09/2023
Minnesota Energy Resources Co. (Docket No. 23-80)	
MERC 2022 Natural Gas Service Quality Report	05/01/2023
Department of Commerce Comments	09/28/2023
MERC Reply Comments	10/06/2023
Great Plains Natural Gas (Docket No. 23-78)	
Great Plains 2022 Natural Gas Service Quality Report	5/01/2023
Department of Commerce Comments	09/28/2023
Great Plains Reply Comments	10/09/2023
Great Plains Response to Commission Staff's Information Request	11/17/2023
Greater Minnesota Gas (Docket No. 23-81)	
GMG 2022 Natural Gas Service Quality Report	04/30/2023
Department of Commerce Comments	08/25/2023

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STATEMENT OF ISSUES

Should the Commission accept the Gas Utilities' Natural Gas Service Quality Reports for 2022?

BACKGROUND

The Commission requires CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint" or "CPE"), Great Plains Natural Gas Co. ("Great Plains"), Greater Minnesota Gas, Inc. ("GMG"), Minnesota Energy Resources Corporation ("MERC"), and Northern States Power Company d/b/a Xcel Energy ("Xcel"), collectively "the Gas Utilities", to file annual service quality reports. Standards and reporting requirements have been established over time through Commission Orders, with the Commission's August 26, 2010, Order in Docket No. G999/CI-09-409 ("the 09-409 Order") serving as the foundation for gas service quality reporting requirements. The Gas Utilities are required to provide information on the following service quality, reliability, and safety categories within their annual service quality reports:

- Call Center Response Times
- Meter Reading Performance
- Involuntary Service Disconnections
- Service Extension Requests
- Customer Complaint Data
- Natural Gas Emergency Response
- Service Interruptions
- Integrity Management Planning Data
- Minnesota Office of Pipeline (MNOPS) Safety Reports
- Excess Flow Valves (EFVs) and Manual Shut-off Valves

Most recently, with its August 5, 2022, Order[1] the Commission delegated authority to the Executive Secretary to implement a working group with the Gas Utilities, the Department of Commerce (the Department), MNOPS, and Commission Staff, collectively the natural gas working group (NGWG), to continue exploring comparative performance metrics for use in future gas service quality reports. The Commission had previously ordered the Gas Utilities to supplement their 2020 service quality reports with a discussion regarding appropriate methods for comparing the Gas Utilities' service quality performance nationally or regionally. However, in the Gas Utilities' October 1st, 2021, filings,[2] they stated that they were unable to identify such a method.

The NGWG met five times between April 2023 and October 2023 to discuss gas utility service quality reporting. The NGWG's final report was filed on December 6, 2023, in Docket No. G002, G022, G004, G011, G008/CI-22-548 and will be heard by the Commission at the same December 21, 2023, agenda meeting as the Gas Utilities' annual service quality reports.

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[1] Docket Nos. 21-301, 21-303, 21-304, 21-300, and 21-131

[2] Id.

In the same August 5, 2020 Order, the Commission required the Gas Utilities to propose web-based service metrics similar to those used by electric utilities. The Gas Utilities filed a joint proposal on September 1, 2022, in their 2020 gas service quality dockets.[3]

The Commission responded to the Gas Utilities' proposed metrics in its May 1, 2023 Order,[4] in which the Commission requested that the Gas Utilities jointly file a reporting template for the requested information within 90 days of the Order's issuance. The reporting template was to include:

- A uniform list of customer service electronic communication types.
- A uniform list of subjects for which to categorize email or customer service communications based on the complaint reporting categories outlined in Minn. R. 7826.2000 when feasible.

On August 1st, 2023, the Gas Utilities requested an extension, which was approved by the Commission. The extension allowed the Gas Utilities' response to the Commission's May 1, 2023, Order to be included in the NGWG's final report. The Gas Utilities' final recommendations have been included in the NGWG's final report.

Like last year, Staff has filed a single Briefing Paper to address all five 2022 gas service quality reports. This Briefing Paper focuses on the content of the reports and their sufficiency, aiming toward the ultimate question of whether the Commission should accept the Gas Utilities' reports.

Staff continued compiling gas utilities' service quality data into a single data repository. Staff appreciates the efforts made by MERC and GMG to make service quality data more accessible.

SUMMARY OF CONCLUSIONS AND RECOMMENDATIONS

All five gas utilities filed annual service quality reports by May 1, 2022. The Department was the only party to comment on the filings. After review, the Department recommended the Commission accept each of the Gas Utilities' annual service quality reports (**Decision Option 1**).

The Department made several additional recommendations in its comments on Xcel's 2022 service quality report.

First, the Department asked Xcel to update the data reported in its attachment outlining Meter Reading metrics in future Gas Service Quality Reports (Attachment B in the 2022 report) to ensure the attachment's data reflects all corrections for erroneous duplicate reporting, consistent with the Commission's Orders in Docket No. E,G002/M-13-371 and G002/M-22-210 (**Decision Option 2**). Staff notes that Xcel did provide the required data in data tables within the

[3] Id.

[4] Docket Nos. 22-210, 22-213, 22-219, 22-211, and 22-193.

body of its service quality report.[5] However, going forward, the Department would prefer if the Company's corrected data was represented within the larger dataset included in Attachment B of the Company's service quality reports.

The Department also requested that Xcel provide annual data to accompany the monthly information it provides on several reporting categories, including meter reading, involuntary service disconnections, call center complaints, and gas emergency response times (**Decision Option 3**).

In its reply comments, Xcel agreed to the Department's recommendations and stated that it would provide the requested information in future gas service quality reports.

Staff agrees with the Department but would instead recommend that all five gas utilities be required to accompany their monthly data with annual totals. For instance, if a gas utility provides monthly totals for service interruptions, they should also provide an annual total. Likewise, if a utility provides monthly averages for emergency response times, they should provide an annual average as well **(Decision Option 4).** Considering that several utilities do not provide their service quality data in a machine-readable format, the inclusion of annual totals, or averages, would help reduce the time required to compile and analyze the Gas Utilities' service quality data.

In reviewing the Gas Utilities' complaint data, Staff found that several utilities' reporting of complaints forwarded by the consumer affairs office (CAO) was inconsistent with CAO's records.

Table 1: 2022 Complaints Forwarded by CAO

Utility	Reported by Utility	Reported by CAO
Xcel	330	303
CenterPoint	166	217
MERC	45	74
Great Plains	4	2
GMG	0	0

The cause of these discrepancies was inconsistent across utilities. Staff and CAO believe that CenterPoint's under-reporting was a result of the company not including Cold Weather Rule (CWR) appeals as complaints. CAO explained that these appeals are considered a complaint as a customer had to contact CAO because the Company could not agree with them on a payment plan. Further, CWR appeals are defined as a dispute by Minn. Stat. § 216B.096 Subd. 8.[6] It may be that other differences in how a "complaint" is defined caused additional discrepancies.

Given that each gas utility receives a monthly complaint report from CAO, Staff would not

[5] Docket No. 23-77, Xcel Service Quality Report, Table 2 and Table 3.

[6] https://www.revisor.mn.gov/statutes/cite/216B.096

expect to find discrepancies between the Gas Utilities' records and CAO's. After discussing this issue with CAO, Staff believes that the most efficient way to resolve these discrepancies would be to have the gas utilities work with CAO to ensure their records match each other (**Decision Option 5**). Staff intends to continue to monitor this issue in the future.

In the following section, staff provides a summary of its analysis, specifically highlighting areas where Staff recommend additional attention be paid in next years' service quality reports.

SUMMARY OF STAFF ANALYSIS

Call Center Answer Time

- Despite improvements to Xcel's call center performance in 2022, the Company has not yet returned to pre-pandemic levels of service. Staff will continue to monitor Xcel's call center performance in future service quality reports.
- In 2022 CenterPoint recorded a 55% increase in the average answer speed of its call center (excluding IVR) but was still able to answer over 80% of calls within 20 seconds. Staff will continue to monitor CenterPoint's call center performance in 2023.

Meter Reading

- Xcel saw the number of meters unread for 6-12 months and 12+ months increase by 305% and 102% compared to 2021, respectively. The Company explained that these increases were caused by supply chain issues that prevented the company from replacing or repairing meters that were not transmitting properly. The Company predicted that its meter reading performance will return to normal levels by the end of 2024. Staff intends to continue to monitor this situation in future service quality reports.

Involuntary Disconnections

- The percent of disconnections restored within 24 hours for all gas utilities remained low in 2022 likely due to increased arrearages resulting from the State's disconnection moratorium during the pandemic. Staff will continue to monitor utilities' involuntary service disconnection data in 2023 to see if the percent of disconnections restored within 24 hours improves as we move further away from the pandemic and the associated disconnection moratorium.

Service Extensions

- Staff recommends continuing to monitor Great Plains' service extension data in future gas service quality reports, as the Company set record-highs four years in a row for the average number of days needed to complete new residential service extensions.

Complaints

- Complaints handled by Xcel's Customer Advocate Group ("CAG") continue to require more time to resolve. Xcel reported an all-time low of 9% for the percent of CAG complaints resolved on initial inquiry and an all-time high of 7% for the percent of complaints resolved in 10 or more days. Staff intends to monitor Xcel's complaint resolution time in future service quality reports.

- Xcel, CenterPoint, MERC, and Great Plains reported complaints forwarded by CAO inconsistent with CAO's records. Staff will continue to monitor this issue in the future and would recommend that utilities work with CAO to ensure their reporting of this information is consistent with CAO's records in the future.

Mislocates

- MERC's 2022 mislocate rate reached a record high in 2022. However, the Company has taken steps to address this issue, and its year-to-year locate performance has been relatively stable with no clear upward or downward trend. Staff intends to monitor MERC's 2023 mislocate performance to see what effect its actions had on the Company's mislocate rate.

Gas Line Damages

- Staff intends to continue to monitor MERC's damage rate in future service quality reports, noting that the Company has reported taking steps to reduce damage incidents and service interruptions in the face of increased construction activity.

Service Interruptions

- Staff will monitor MERC's 2023 service interruptions. The number of interruptions reported by MERC has increased in recent years due to increased construction activity and locate staffing issues. MERC has reported taking steps to improve its locate performance which should reduce the number of service interruptions experienced by the company in 2023.

Xcel Meter Equipment Malfunctions

- The number of days required for Xcel to resolve meter reading malfunctions has steadily increased over time. Xcel explained that gas meter supply chain issues have delayed the availability of communications modules necessary for final gas meter assembly. Staff recommends continuing to monitor Xcel's meter equipment malfunction data in 2023 to see if the company's efforts to update its automated gas meter reading solution reduces the number of days required to resolve malfunctions in the future.

CenterPoint Employees and FTE Information

- With its 2022 service quality report, CenterPoint provided information on FTEs performing customer service, maintenance, and installations for the second time. The Commission's March 1, 2021, Order in Docket No. G-008/GR-19-524 only required CenterPoint to provide this information in its "next service quality report." Based on the language of the Commission's March 1, 2021 Order, it would not seem as though this information was intended to be an ongoing reporting requirement for the Company. Should the Commission be satisfied with the information provided by the Company, it may wish to clarify that ongoing reporting is not required in this instance. Due to the specificity of the original Order, Staff does not believe it is necessary to issue a new Order with this clarification.

The following sections include a discussion of each utility's individual performance for each of the required service quality reporting categories. A list of 5 Decision Options is included at the end of the Briefing Paper.

CALL CENTER RESPONSE

Through its Orders, the Commission requires gas utilities to report the following information regarding their call center response times:

- The percentage of calls answered within 20 seconds as described in Minn. Rules, part 7826.1200[7,8]
- The average time required to answer an incoming call.[9]

GMG is required by the Commission's January 18, 2011, Order in Docket No. G-999/CI-09-409 to instead report the total number of phone calls received during each annual reporting period, and the number of times the phone rings before calls are answered.

CenterPoint is required by the Commission's November 25, 2015, Order in Docket No. G-008/M-15-414 to provide interactive voice response (IVR) system 'zero out'[10] data in subsequent annual service quality reports.

When able, Staff will highlight utilities call answer speed with and without calls answered by an IVR system. This decision was made due to the definition of an "answer" provided in Minn. Rules 7826.1200. Specifically, Subpart 1 explains that an answer means "that an operator or representative is ready to render assistance or accept the information to handle the call." Answers from an IVR system are included in the definition of an "answer" under subpart 2, which details how utilities should respond to calls regarding service interruptions.

I. Xcel Energy

In figure 1 below, Staff provides a summary of Xcel's call center response performance.

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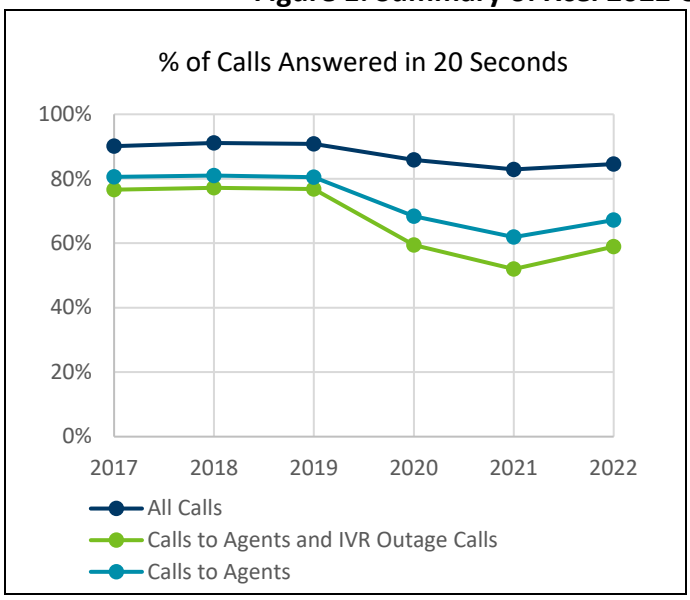
[7] August 26, 2010, Order in Docket No. G999/CI-09-409.

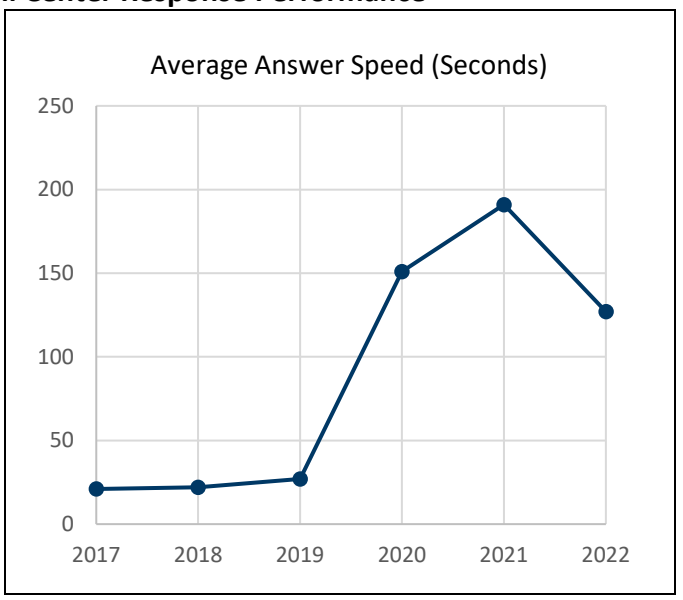
[8] "Utilities shall answer 80 percent of calls made to the business office during regular business hours within 20 seconds. 'Answer' means that an operator or representative is ready to render assistance or accept the information to handle the call. Acknowledging that the customer is waiting on the line and will be served in turn is not an answer. If the utility uses an automated call-processing system, the 20-second period begins when the customer has selected a menu option to speak to a live operator or representative. Utilities using automatic call-processing systems must provide that option, and they must not delay connecting the caller to a live operator or representative for purposes of playing promotional announcements" – Minn. Rule 7826.1200 subd. 1.

[9] March 6, 2012, Order 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.

[10] A customer zeroed-out of the IVR system if they ask to speak to a customer service representative or if they choose to terminate the call.

Figure 1: Summary of Xcel 2022 Call Center Response Performance





% of all Calls Answered Within 20 Seconds	% of Calls to Agents and IVR Outage Calls Answered Within 20 Seconds[11]	% of Calls to Agents Answered Within 20 Seconds	Average Answer Speed (sec)
84.6%	67.2%	58.9%	127
^ 1.7 pp*	^ 5.3 pp	^ 6.9 pp	v - 33.5%

* pp = percentage point

Xcel noted that the Company "worked diligently in the first portion of the year to mitigate post-pandemic market pressures impacting contact center staffing and performance."[12] The Company highlighted the notable improvements in call center performance in the latter half of the 2022. Xcel attributed these improvements to the actions taken throughout the year related to call center staffing and performance.

A. Department Comments

In its analysis, the Department highlighted June as the lowest performance month for Xcel's call center, with only 35.6% of service level agent-only calls being answered within 20 seconds. The Department also highlighted November as the highest performance month for Xcel's call center, with 88.3% of agent-only calls answered within 20 seconds.

The Department explained that Xcel experienced a decline in call center response times in 2020

[11] Minn. Rules, part 7826.1200. Subp.2. specifies that for outage related calls, "answer" may mean connecting the caller to a recording that provides information regarding the outage.

[12] Docket No. 23-77, Xcel Service Quality Report p.2

and 2021 due to employee turnover, absenteeism, the onboarding of new employees, and challenges associated with a move to a virtual work environment. The Department acknowledged that Xcel met the call center response time reporting requirements for 2022.

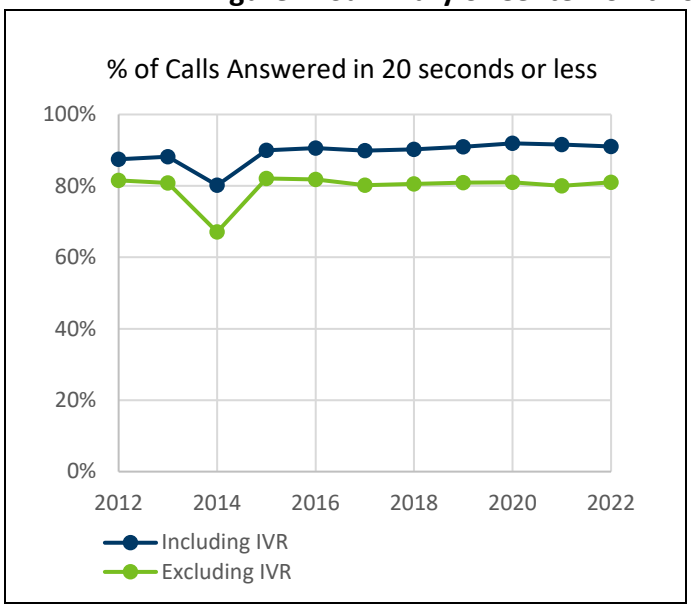
B. Staff Analysis

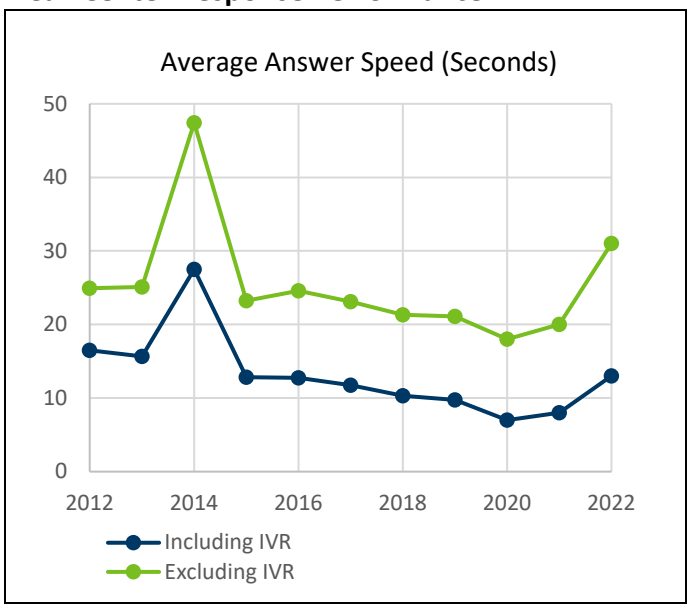
In response to Xcel's 2021 service quality report, Staff recommended monitoring Xcel's future call center performance, noting that the Company had taken steps to improve its performance in the future. Specifically, Xcel reported engaging in aggressive hiring efforts and increasing wages by 20% to $17.00 per hour. At the end of 2021, Xcel stated that its call centers were staffed at 99%. These efforts appear to have resulted in improved call center performance in 2022 with Xcel recording improvements in both the percent of calls answered within 20 seconds and their average answer speed. Despite these improvements, Xcel has not yet returned to pre-pandemic levels of service. Staff will continue to monitor Xcel's call center performance in future service quality reports.

II. CenterPoint

In figure 2 below, Staff provides a summary of CenterPoint's call center response performance.

Figure 2: Summary of CenterPoint 2022 Call Center Response Performance





% of all Calls Answered Within 20 Seconds Excluding IVR	% of Calls Answered Within 20 Seconds Including IVR	Average Answer Speed Excluding IVR (sec)	Average Answer Speed Including IVR (sec)
81%	91%	31	13
^ 1 pp*	v -1 pp	^ 55%	^ 62%

* pp = percentage point

CenterPoint stated that its goal is to achieve an 80/20[13] service level for a 12-month calendar basis. In 2022, the Company reported that 81% of calls (excluding IVR calls) were answered in 20 seconds or less, with an average answer speed of 31 seconds. CenterPoint noted that its average answer speed increased from 20 seconds in 2021 to 31 seconds in 2022. The Company stated that the number of calls answered (excluding IVR calls) also increased from 625,389 calls in 2021 to 776,647 calls in 2022, representing a 24.25% increase.

When including IVR calls, CenterPoint reported that 91% of calls were answered in 20 seconds or less, with an average answer speed of 13 seconds. CenterPoint noted that in 2022 its average answer speed when including IVR calls was five seconds slower than the average answer speed reported in 2021. Call volume, including IVR calls, increased from 1,460,323 calls in 2021 to 1,757,166 calls in 2022. The Company stated that call volumes have been below historic levels as a result of COVID-19 and customers not calling in to respond to disconnection notices.

CenterPoint reported a zero-out rate of 0% in 2022, which is equal to the zero out rate reported in 2020 and 2021.[14]

A. Department Comments

The Department stated that, outside of 2014, CenterPoint's call center has answered at least 80% of non-IVR call in 20 seconds or less. However, other than in 2020, CenterPoint's non-IVR answer speed has consistently exceeded 20 seconds.

The Department noted that the number of IVR calls and non-IVR calls CenterPoint received increased by 24% and 20%, respectively. The Department believes that as CenterPoint transitions from the pandemic, it will see a return to its pre-COVID call volumes.

The Department concluded that CenterPoint met its Call Center reporting requirements for 2022.

B. Staff Analysis

Although CenterPoint's average answer speed when excluding IVR calls has consistently exceeded 20 seconds, it had been steadily improving since 2016. However, in 2022 the Company recorded a 55% increase in the average answer speed of its call center (excluding IVR). In reviewing the Company's monthly data, Staff found that CenterPoint responded to less than 80% of calls within 20 seconds in the months of March, June, and October. In these months, CenterPoint recorded average answer times of 43, 58, and 70 seconds, respectively. Staff agrees with the Department that CenterPoint fulfilled its Call Center reporting requirements and will continue to monitor CenterPoint's call center performance in 2023.

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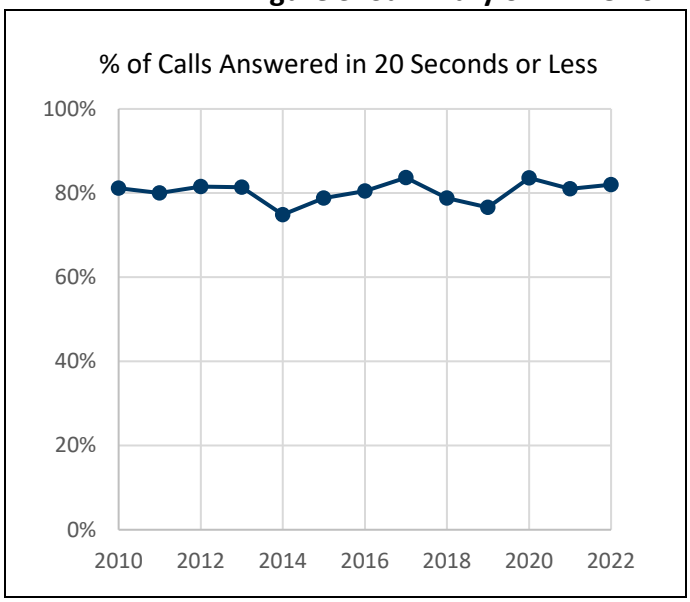
[13] 80% of calls answered in 20 seconds or less with an average answer speed of 20 seconds.

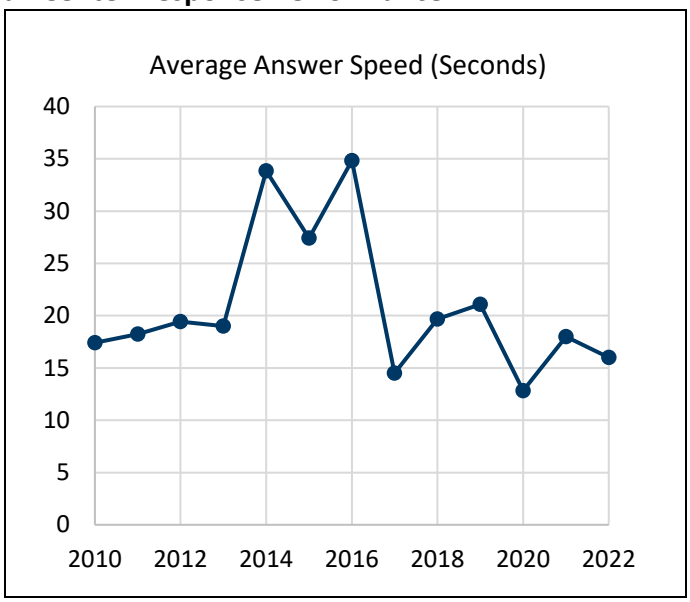
[14] Docket No. 23-79, CenterPoint Service Quality Report Schedule 1a.

III. MERC

In figure 3 below, Staff provides a summary of MERC's call center response performance.

Figure 3: Summary of MERC 2022 Call Center Response Performance





% of all Calls Answered Within 20 Seconds	Average Answer Speed	Total Calls
82%	16	200,888
^ 1 pp*	v -2 Seconds	^ 10.7%

* pp = percentage point

MERC reported that its average call center response time decreased from 18 seconds in 2021 to 16 seconds in 2022 despite receiving more calls. The Company explained that the lower call volumes in 2021 were likely driven in part by the suspension of residential disconnections which ended August 2, 2021.[15]

A. Department Comments

The Department noted that MERC's annual call volume has been held at around 200,000 for the past three years, which is significantly lower than the pre-pandemic call volumes reported by the Company.

[15] See *In the Matter of an Inquiry into Actions of Elec. and Nat. Gas Utilities in Light of the COVID-19 Pandemic Emergency*, Docket No. E, G-999/CI-20-375, Joint Letter (Mar. 25, 2020); *In the Matter of an Inquiry into Actions of Elec. and Nat. Gas Utilities in Light of the COVID-19 Pandemic Emergency*, Docket No. E, G- 999/CI-20-375, Order Adopting Broad Transition Plan Proposal, Suspending Negative Reporting, and Establishing Notice and Communication Requirements (May 26, 2021).

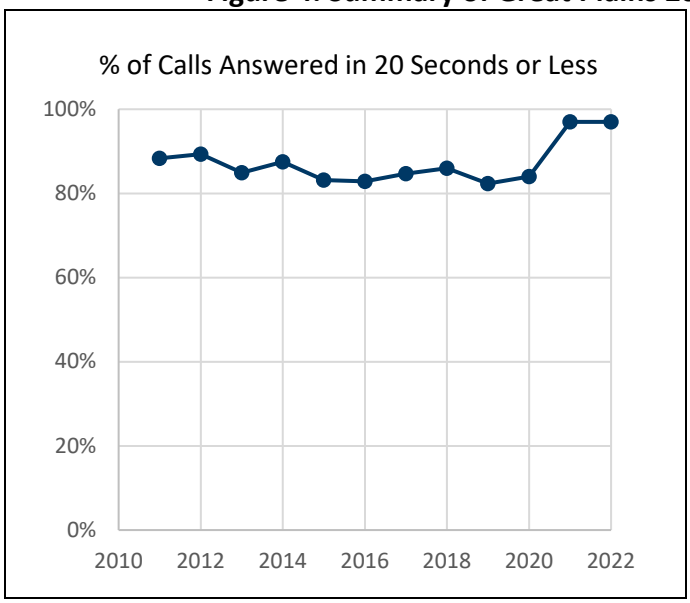
B. Staff Analysis

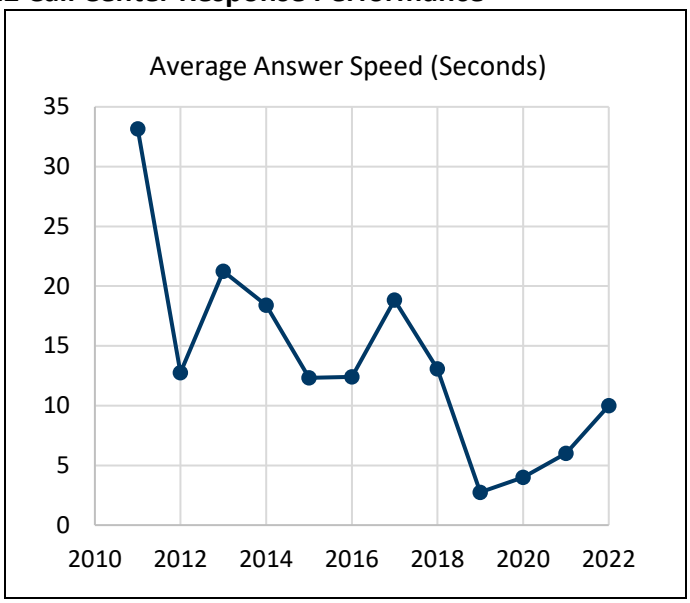
Staff supports the Department's analysis and notes that MERC fulfilled its call center service quality reporting requirements for 2022. Staff does not recommend additional action at this time.

IV. Great Plains

In figure 4 below, Staff provides a summary of Great Plains' call center response performance.

Figure 4: Summary of Great Plains 2022 Call Center Response Performance





% of all Calls Answered Within 20 Seconds	Average Answer Speed	Total Calls
97%	10	43,978
No Change	^ 4 Seconds	^ 55.1%

* pp = percentage point

Great Plains reported receiving 43,978 calls in 2022 with 97% of calls answered in 20 seconds or less. The Company stated that it expanded its IVR call tracking capability to include all calls. Previously the Great Plains was only able to track IVR calls related to a specific customer accounts. This change can be seen within the Company's reported call totals for 2022.

A. Department Comments

The Department stated that, on average, Great Plains has been able to consistently answer more than 80% of calls within 20 seconds or less. The Department highlighted that Great Plains' 2022 call volume was much higher than in previous years, likely due to the Company's expanded IVR call tracking capability. The Department concluded that Great Plains met its call center service quality reporting requirements for 2022.

B. Staff Analysis

In 2022 Great Plains was able to maintain its record high percentage of calls answered within 20 seconds or less. Although the Company's average answer speed has been increasing steadily since 2019, the Company has consistently been able to respond to customer calls in 10 seconds or less. Staff agrees with the Department that Great Plains met its call center response reporting requirements and does not recommend additional action at this time.

V. GMG

In 2022, GMG reported receiving 12,997 incoming calls to its primary business line, reflecting a 2.2% increase over 2021.[16] According to the Company, all calls are answered live by GMG's customer service team within three rings, or approximately 15 seconds. If GMG's personnel are unable to answer within three rings, the call is automatically forwarded to a professional live telephone answering service. This answering service will typically answer the call within one additional ring after the call has been transferred, ensuring live contact with the customer within the 20 second goal.

A. Department Comments

The Department stated that based on the data provided by GMG, the Company most likely answered calls promptly in 2022.

B. Staff Analysis

Staff agrees with the Department and notes that GMG fulfilled its call center service quality reporting requirements. Staff does not recommend additional action at this time.

METER READING PERFORMANCE

Through its August 26, 2010 Order in Docket No. G999/CI-09-409, the Commission requires the Gas Utilities to provide information on meter reading performance pursuant to Minn. Rules, part 7826.1400:

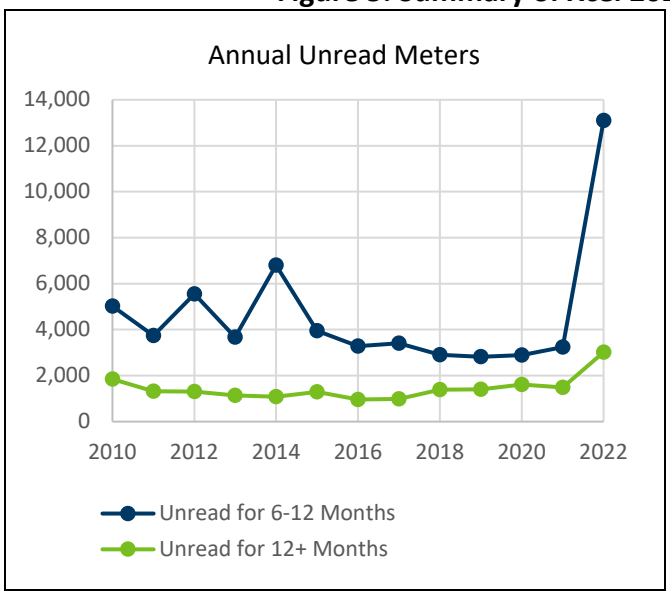
- The number and percentage of customer meters read by utility personnel;
- The number and percentage of customer meters self-read by customers;
- The number and percentage of customer meters that have not been read by utility personnel for periods of six to 12 months and for periods of longer than 12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

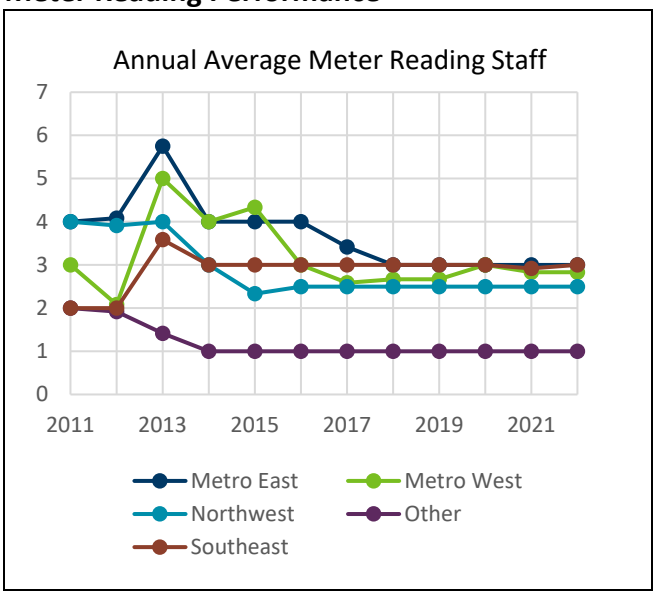
I. Xcel Energy

In figure 5 below, Staff provides a summary of Xcel's meter reading performance.

[16] Docket No. 23-81, GMG Service Quality Report, p.3.

Figure 5: Summary of Xcel 2021 Meter Reading Performance





% of Meters Read by Xcel	Average Number of Meter Reading Staff	Meters Not Read for 6-12 Months**	Meters Not Read for 12+ Months
93.9%	12.3	13,097	3,012
⌄ 5.93 pp*	No Change	⌃ 305%	⌃ 102%

* pp = percentage point

** Staff notes that when reporting total meters unread for 6-12 months, or 12+ months, meters may be double counted if they remained unread across multiple months.

In response to Order Point 3 of the Commission's May 1, 2023, Order in Docket 22-210, Xcel provided a data table that displayed updated meter reading data to account for a reporting error described on page five of the Company's 2021 gas service quality report. Staff notes that the updated data from Xcel's data table has been applied to the charts in figure 5.[17]

In its 2022 service quality report, Xcel explained that the Company attempts to manually read all meters that are not transmitting customer usage data at least once per month. If a meter read is not entered into the Company's meter reading system, the system records a "No Read Returned"[18] code. Xcel's data displays its employees' attempts to read meters, including a reason for why a meter read was unsuccessful,[19] as well as the number of meters the company

[17] Docket No. 23-77, Xcel Service Quality Report, Table 2, p.4

[18] Xcel explains that, typically, "No Read Returned" codes are related to situations where Xcel's meter reading employees are unsuccessful in getting a manual reading in previous months due to customer-controlled issues. The Company stated in these instances, it will move its resources to meters that have not had a previous reading attempt or that the Company knew it had access to.

[19] The reasons for an unsuccessful meter read is known as a "skip code".

did not attempt to read at all via the number of "No Read Returned" codes recorded in the data. Xcel explained that "No Read Returned" entries are often related to situations where the Company has already been unsuccessful in getting a manual meter read in previous months due to customer-controlled issues. In these instances, Xcel's meter reading staff focus their resources on meters they have not yet attempted to manually read.

For both residential and commercial customers, Xcel stated that supply chain issues were a major cause for the number of unread meters in 2022:

> In 2022, supply chain issues related to obtaining parts from our current vendor continued to be a challenge resulting in a significant decrease in automated read performance and driving our inability to receive and exchange meters/modules that were not transmitting. The inability to exchange the meters/modules led to an unplanned significant increase in the number of manual read requests that we do not have the staffing resources to cover, ultimately causing a meaningful increase in "No Read Return" estimates. We expect this number to decrease with the conversion to new meters.[20]

A. Department Comments

The Department reported that the "no reading returned" code accounted for 77.96% of unread meters and was the most common reason across all customer classes for failure of meters to be read. As a part of its analysis, the Department compared Xcel's 2022 meter reading performance to three-year averages and found that the number of meters unread for 6-12 months and for 12+ months were 339% and 101% greater than the three-year average, respectively.

In an information request, the Department asked Xcel if they anticipate the reported supply chain issues persisting and requested that Xcel address how it will respond to the increase in unread meters. In response, Xcel stated:

> "The supply chain issues we encountered in 2022, although not resolved, are beginning to return to a normal level in 2023. We continue to work on the backlog of meter exchanges previously not completed, which will reduce the number of manual reads required. Barring additional unforeseen supply chain challenges, we anticipate being caught up with meter exchanges and returning to normal meter reading levels by the end of 2024."[21]

The Department acknowledged that Xcel fulfilled its meter reading requirements. However, they recommended that Xcel update the data reported in their Meter Reading attachment in future Gas Service Quality Reports (attachment B in the 2022 report) to ensure that the

[20] Docket No. 23-77, Xcel Service Quality Report, pp.7-8

[21] Docket No. 23-77, Department Reply, Attachment 2

attachment's data reflects all corrections for erroneous duplicate reporting consistent with the Commission's Orders in Docket No. E,G002/M-13-371 and G002/M-22-210.

The Department also asks that Xcel begin including annual total for meter reading data on the number and percent of customer meters unread by utility personnel and customers in future Gas Service Quality Reports (in the 2022 Report, Attachment B's tables A and B).

Staff notes that Xcel agreed to update Attachment B in its next Gas Service Quality Annual Report to reflect the corrections referenced by the Department.

B. Staff Analysis

The record shows that Xcel's meter reading performance was driven by supply chain issues. As the company moves away from its Cellnet AMR service to the new advanced metering infrastructure (AMI) meters, Staff would expect Xcel's meter reading performance to improve.[22]

Xcel did not describe any efforts taken by the company to improve meter reading performance outside the transition to AMI meters. Given the information provided on the record, the increase in unread meters reported by Xcel appears to be temporary. Improved supply chain conditions and the move to AMI point toward better meter reading performance in the coming years. Specifically, Xcel suspects its meter reading performance to return to normal by the end of 2024. Staff supports the Department's analysis and will continue to monitor Xcel's meter reading performance in future service quality reports.

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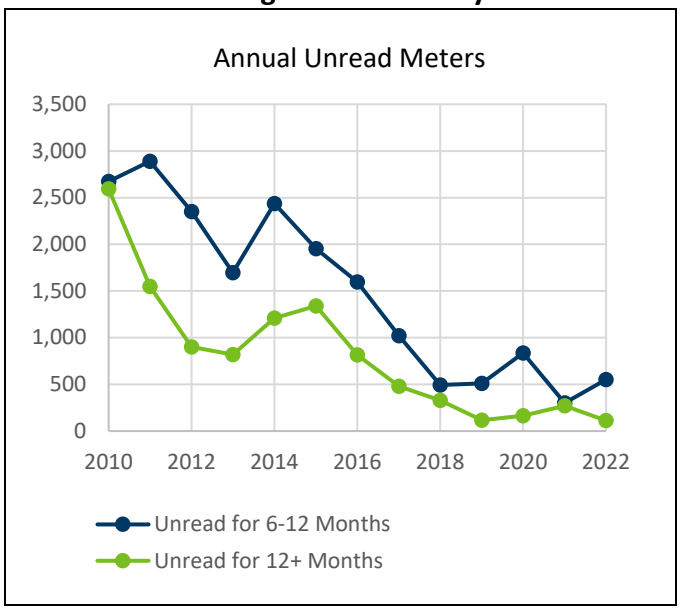
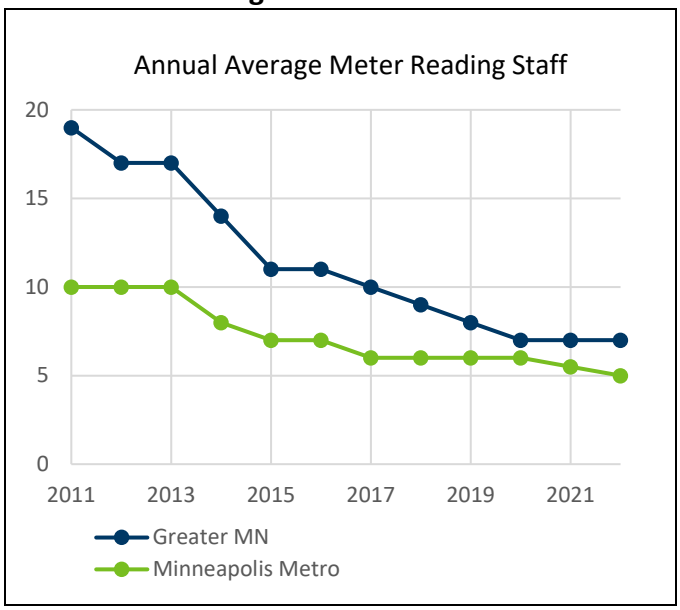
[22] Docket No. 23-77, Xcel Service Quality Report, p.5

II. CenterPoint

In figure 6 below, Staff provides a summary of CenterPoint's meter reading performance.

Figure 6: Summary of CenterPoint 2022 Meter Reading Performance





% of Meters Read by CenterPoint	% of meters read by customers	Meters Not Read for 6-12 Months**	Meters Not Read for 12+ Months
99.2%	0%	553	112
⌄ 0.1pp*	No Change	⌃ 84%	⌄ -59%

* pp = percentage point

** Staff notes that when reporting total meters unread for 6-12 months, or 12+ months, meters may be double counted if they remained unread across multiple months.

CenterPoint reported that in 2022, 99.19% of meters were read by the Company. According to CenterPoint, 0.00% of all meters were not read in 6 to 12 months and 0.00% of all meters were not read in over 12 months, which the Company stated is consistent with 2021.[23]

Average staffing levels decreased from 5.5 in 2021 to 5.0 in 2022 for the Minneapolis Metro area. However, staffing levels for Greater Minnesota remained steady with the Company reporting seven meter reading staff for the past several years.

A. Department Comments

The Department stated that the average number of meters not read for 6 to 12 months increased by 84% in 2022, but the average number of meters not read for 12+ months

[23] Docket No. 23-79, CenterPoint Service Quality Report, p.2.

decreased by 41%. The Department noted that the number of meters unread for 6-12 months and for 12+ months were elevated in 2020, presumably due to the pandemic.

The Department concluded that CenterPoint met its meter reading reporting requirements for 2022.

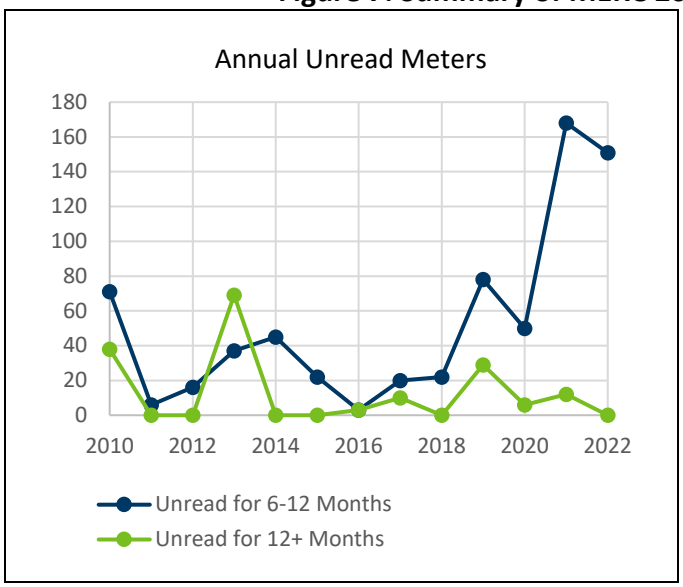
B. Staff Analysis

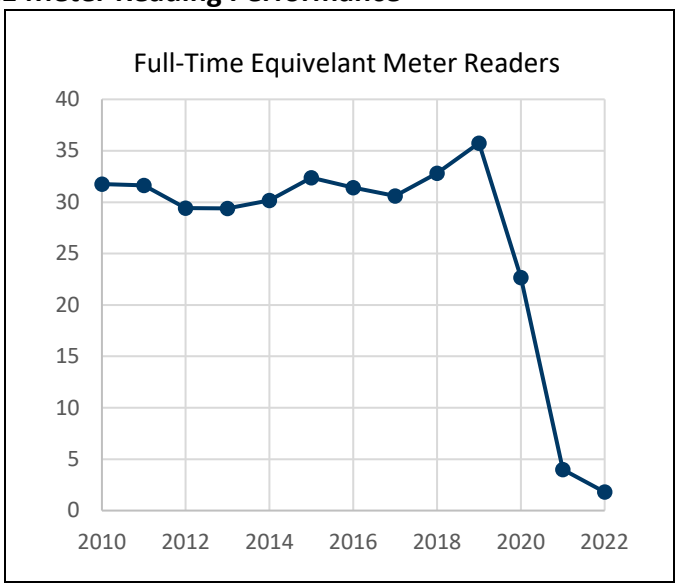
Staff agrees with the Department that CenterPoint met its meter reading reporting requirements for 2022 and does not recommend any additional action at this time.

III. MERC

In figure 7 below, Staff provides a summary of MERC's meter reading performance.

Figure 7: Summary of MERC 2021 Meter Reading Performance





% of Non-Farm Tap Meters Read by MERC	% of meters read by customers	Meters Not Read for 6-12 Months**	Meters Not Read for 12+ Months
97%	0%	151	0
^ 1.7pp*	No Change	v -10%	v -100%

* pp = percentage point

** Staff notes that when reporting total meters unread for 6-12 months, or 12+ months, meters may be double counted if they remained unread across multiple months.

MERC reported that in 2022, 96.8% of meters were read by either the utility or the customer, 3.2% of meters were not read by either the utility or customers, and 1.5% of meter reads were estimated.[24] The Company noted that in 2022 estimated meter reads were not the result of insufficient internal and contracted meter readers, but rather due to weather and other

[24] Docket No. 23-80, MERC's Service Quality Report, p.4.

circumstances. MERC has continued to deploy AMI in 2022.

Regarding unread meters MERC stated that, consistent with prior years, well below 1% of meters were not read for over six months.

Figure 7 above, highlights a drop in full-time-equivalent (FTE) staffing for meter reading. The Company addressed the significant drop time charged to meter reading noting that some meter reading activities were charged to the AMI deployment project and not to meter reading staffing. This has resulted in a lower FTE meter reading reporting.

A. Department Comments

The Department stated that in any given month during 2022, on average, only 13 customer meters (excluding farm taps) went unread for six or more months. The Department explained that, inclusive of farm taps, MERC reported that greater than 96% of meters were read by the Company, less than 0.3% of meters were read by customers, and less than 0.1% of meters had not been read in six or more months.

B. Staff Analysis

Last year, MERC addressed the recorded number of meters unread for 6-12 months in an ex parte communication with Staff, stating:

> "As discussed at page 4 of MERC's Annual Service Quality Report for 2021, filed on May 2, 2022, MERC was undergoing its AMI deployment during 2021. The work to transition and stabilize during the AMI project was the cause for the increase in meters not read in 6-12 months during 2021. As discussed at page 4, during this process, estimated meter reads do sometimes occur due to the ERT failing to communicate and/or issues with the communication network. These issues are normal during a wide scale AMI project. MERC is continuing its AMI deployment into 2022, and once the AMI deployment is complete and in a steady-state, would expect the meters not read in 6-12 months to decrease back to historical levels (or lower)."[25]

Staff notes that MERC fulfilled its meter reading performance reporting requirements for 2022.

IV. Great Plains

Since December of 2017 all the meters in Great Plains' service territory have been equipped with automated meter reading technology (AMR). In 2022, there were a total of 271,923 meter reads, of which 99.98% were read via AMR or utility personnel.[26] The remaining 0.02% of meter reads were estimated by the system. Great Plains reported that no meters went unread for more than 6 months, and that no meters were self-read by customers. Great Plains' average

[25] Docket No. 22-219, March 28, 2023, Ex Parte Communication.

[26] Docket No. 23-78, Great Plains Service Quality Report, p.1.

meter reading staffing level for has been three people since 2016.

A. Department Comments

The Department explained that since implementing its AMR system in 2015, Great Plains has conducted all meter readings via the automated system or utility personnel. For all years from 2012 through 2022, Great Plains has reported that zero meters have gone unread for a period of six or more months. The Department concluded that Great Plains met its meter reading reporting requirements for 2022.

B. Staff Analysis

Staff supports the Departments analysis and does not recommend additional action at this time.

V. GMG

In 2022, GMG reported reading 99.998% of meters, with only 2 meters (0.002% of all meters) receiving estimated reads.[27] The Company noted that it has very few estimated meter reads due to its use of AMR. On the occasions where meters were estimated, it was due to an unforeseen and uncontrollable circumstance in which the AMR equipment did not pick up the meter read in one month. No meters went unread for 6-12 months of for more than 12 months.

A. Department Comments

The Department noted that based on the data provided by GMG over the past several years, the company's deployment of AMR has been successful in terms of reduced estimated meter reads, customer-read meters, and unread meters.

B. Staff Analysis

Staff supports the Department's analysis and believes that GMG fulfilled its meter reading reporting requirements. Staff does not recommend additional action at this time.

INVOLUNTARY SERVICE DISCONNECTIONS

Through its 09-409 Order, the Commission requires Gas Utilities to provide involuntary disconnection data in their annual service quality reports under Minn. Stat. § 216B.091 and § 216B.096 (Cold Weather Rule reports). This includes, but is not limited to, information on:

- the number and total amount of past due accounts;
- the number of disconnection notices mailed;
- the number of accounts disconnected for nonpayment;
- the number of accounts reconnected to service;
- the number of cold weather protection requests; and
- the number of payment arrangement requests received and granted.

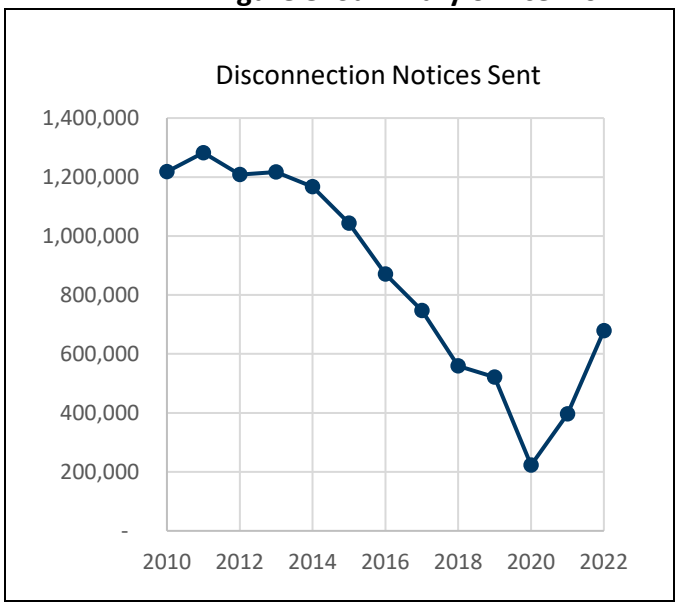
[27] Docket No. 23-81, GMG's Service Quality Report, p.3.

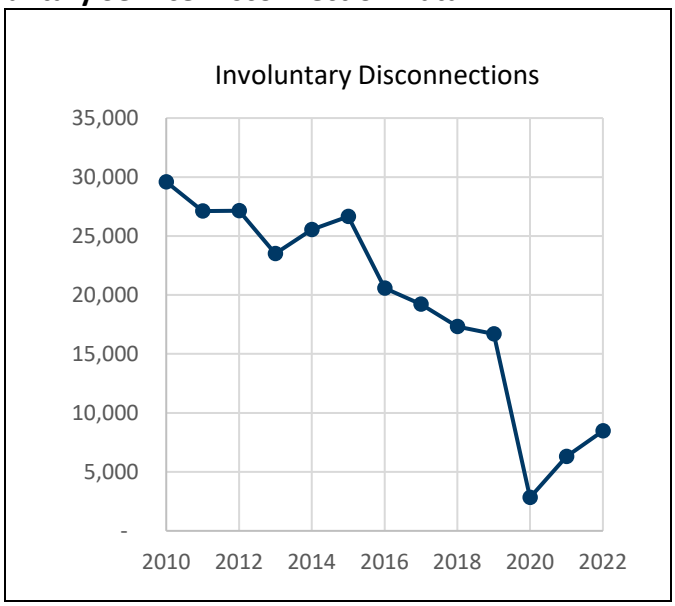
With the end of the disconnection moratorium in August 2021, utilities are now able to resume disconnections consistent with pre-pandemic policies. Staff notes that 2022 represents the first full calendar year in which utilities have been able to make disconnections since the pandemic began.

I. Xcel Energy

In figure 8 below, Staff provides a summary of Xcel's involuntary service disconnection data.

Figure 8: Summary of Xcel 2022 Involuntary Service Disconnection Data





Customers Receiving Disconnection Notices	% of CWR Requests Granted	Customers Disconnected Involuntarily	% of Disconnections Restored within 24 hours
678,664	100%	8,486	37%
^ 71.2%	No Change	^ 35%	v -50 pp*

* pp = percentage point

Xcel reported sending 678,664 disconnection notices in 2022. The Company made 8,486 involuntary service disconnections, 37.6% of which were restored within 24 hours. Xcel granted 100% of the CWR requests it received in 2022. Staff notes that Xcel did not provide a narrative to accompany this data.

A. Department Comments

The Department highlighted the increase in disconnection notices sent by Xcel in 2022, noting that the Company has exceeded the annual number of disconnection notices sent in the two years preceding the pandemic. The Department also drew attention to the decline in disconnections restored within 24 hours during 2022. The Department noted that Xcel appears to be dealing with customer arrearages resulting from the suspension of disconnections during

the pandemic.

The Department concluded that Xcel met the involuntary disconnection reporting requirements for 2022 and requested that Xcel begin including annual totals for involuntary service disconnection data in future Gas Service Quality reports (see attachment C in Xcel's 2022 report).

Staff notes that in its reply comments, Xcel agreed to begin including annual totals for involuntary service disconnections in future reports.

B. Staff Analysis

A rise in disconnections was expected in 2021 and 2022 as utilities began disconnecting customers after the conclusion of the disconnection moratorium in August of 2021. However, Staff is concerned with the relatively few of disconnections being restored within 24 hours. In 2022, Xcel recorded the fewest number of disconnections restored in 24 hours since reporting began in 2010. Staff will continue to monitor Xcel's involuntary disconnection data in 2023 to see if the reported percent of disconnections restored within 24 hours begins to return to pre-pandemic levels.

II. CenterPoint

In figure 9 below, Staff provides a summary of CenterPoint's involuntary service disconnection data.

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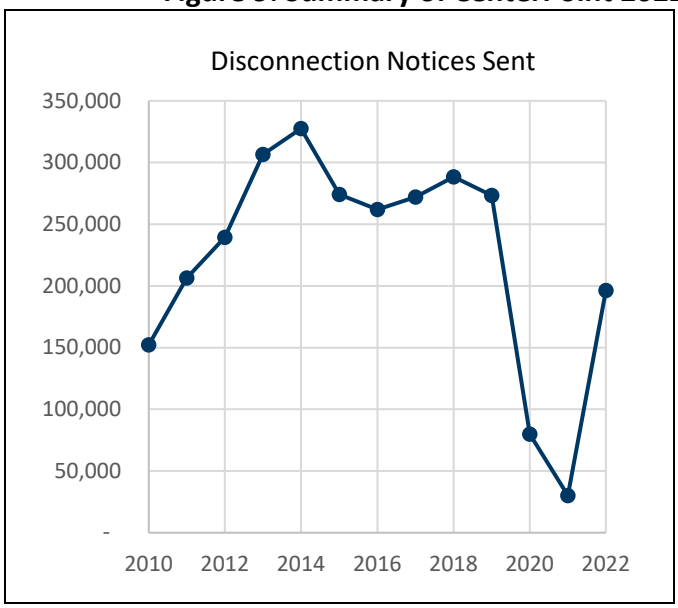
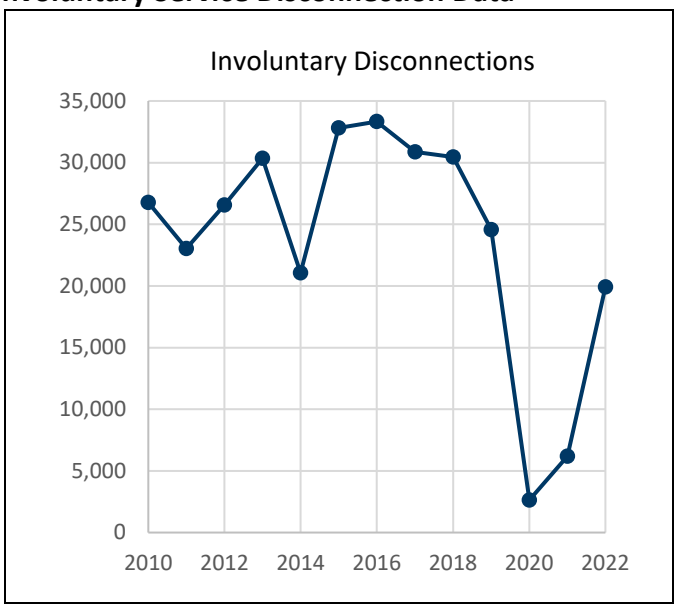
Figure 9: Summary of CenterPoint 2022 Involuntary Service Disconnection Data





Customers Receiving Disconnection Notices	% of CWR Requests Granted	Customers Disconnected Involuntarily	% of Disconnections Restored within 24 hours
196,380	92%	19,913	14%
^ 551%	v -6 pp*	^ 221%	No Change

* pp = percentage point

CenterPoint reported that there were 19,913 customers disconnected for nonpayment in 2022, compared to 6,200 in 2021. The Company noted that 2020 and 2021 were below historical averages for customer disconnections as a direct result of halting the disconnection process in response to the COVID-19 pandemic.

A. Department Comments

The Department noted that although CenterPoint saw its involuntary disconnections increase in 2022, the Company is still below pre-pandemic levels. The Department explained that the length of the disconnection moratorium and the size of the past due bills are likely to blame for the low number of disconnections restored within 24 hours. The Department anticipates that more time is needed for this metric to return to pre-pandemic levels, but in the meantime the Department stated that it would continue to monitor this issue.

The Department concluded that CenterPoint met the involuntary service disconnection reporting requirements for 2022.

B. Staff Analysis

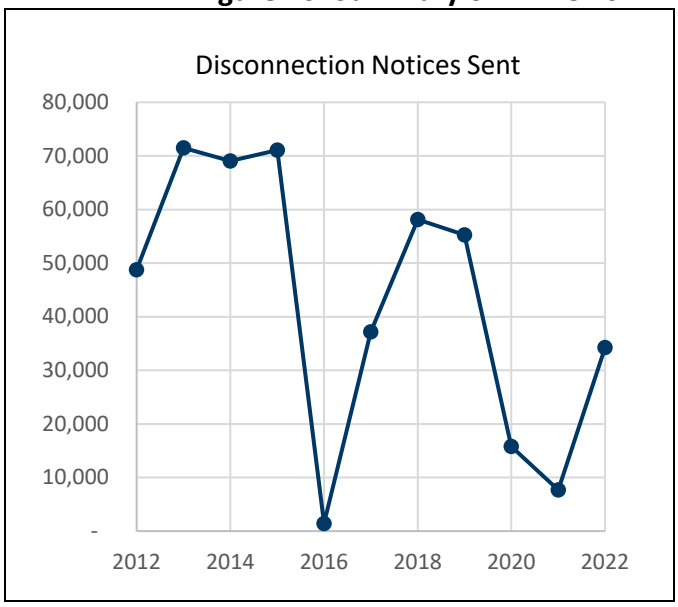
Last year, the Department highlighted CenterPoint's abnormally low percentage of disconnections that were reconnected in 24 hours. In their analysis, the Department explained

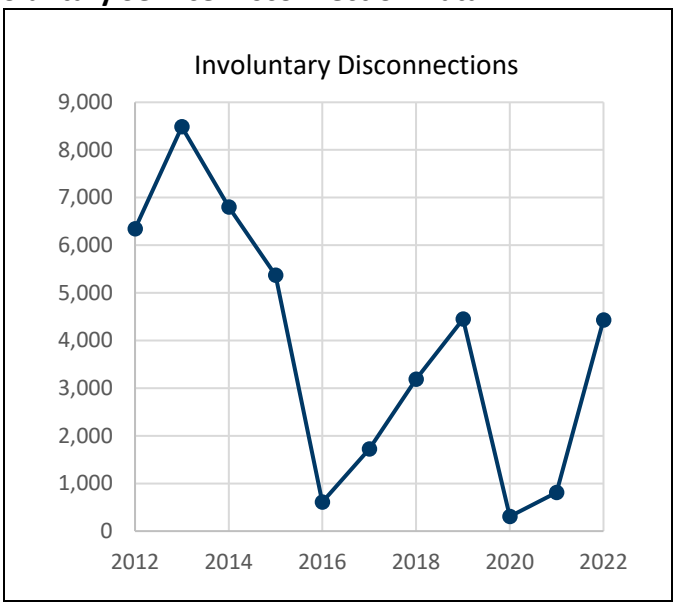
that there is a seasonality to disconnections due to the Cold Weather Rule, and that the disconnection moratorium disrupted a typical surge of disconnections that occurs in the spring. A high percentage of these disconnections are restored in 24 hours. Additionally, the Department stated that the dollar amount past due also influences the number of connections restored in 24 hours. With the impacts of the pandemic and the associated disconnection moratorium still being felt by utilities, Staff intends to continue to monitor Gas Utilities' involuntary service disconnection data in 2023 to see if the percent of disconnections restored in 24 hours begins to return to pre-pandemic levels.

III. MERC

In figure 10 below, Staff provides a summary of MERC's involuntary service disconnection data.

Figure 10: Summary of MERC 2022 Involuntary Service Disconnection Data





Customers Receiving Disconnection Notices	% of CWR Requests Granted	Customers Disconnected Involuntarily	% of Disconnections Restored within 24 hours
34,262	99.8%	4,427	0.29%
^ 346%	No Change	^ 445%	(Previously 0)

* pp = percentage point

In response to the Commission's May 1st, 2023 Order[28], MERC filed corrected disconnection data in its 2021 service quality report docket[29] and in affected CWR dockets to resolve errors

[28] Docket Nos. G-002/M-22-210, G-008/M-22-213, G-011/M-22-219, G-004/M-22-211, and G-022/M-22-193

[29] May 19, 2023, Compliance Filing, Docket Nos. G011/M-22-219 and E,G999/PR-21-2

identified by Staff in its briefing papers.[30] MERC reported that the data provided on involuntary disconnects in its 2021 service quality report was correct and they filed updated CWR reports for the months of August and September 2021 to reconcile the disconnection duration data in Docket No. E,G999/PR-21-2 to the data reported in its 2021 gas service quality report. MERC explained that differences in the data reported in the Company's 2021 service quality report and its 2021 CWR report were due to a change in how disconnection duration was reported. Prior to the Commission's adoption of the Residential Customer Status Report,[31] disconnection duration reporting was only required to be reported during the CWR period and was based on those restored *within 24 hours of entering a payment plan.*[32] The Company now reports the percent of customers restored within 24 hours as the number of customers whose service was restored within 24 hours of disconnection. For these reasons, the Company noted that comparisons cannot be made between current reporting and data reported prior to 2020 regarding the percentage of customers restored within 24 hours.

As a result of the COVID-19 moratorium on disconnections, MERC explained that disconnections were substantially lower in 2020 and 2021. In 2022, the Company reported sending 34,262 disconnection notices and making 4,427 disconnections.[33] The Company reported approving 100% of the CWR requests they received.

A. Department Comments

The Department stated that although MERC reported sending more disconnection notices, making more involuntary disconnections, and receiving more CWR requests from customers in 2022, these numbers are still lower than what was reported prior to the start of the pandemic.

B. Staff Analysis

Staff previously noted its intention to monitor MERC's involuntary disconnection data in future service quality reports to ensure that the information reported in the service quality reports matches what the Company is reporting in its CWR reports. Staff has confirmed that the disconnection data filed in MERC's 2022 service quality report matches the information provided in the Company's end of year CWR report.

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[30] Staff questioned the accuracy of MERC's CWR reporting due to the company reporting that 0% of their 812 disconnections in 2021 were reconnected within 24 hours. Staff noted that the Company's reportage percentage does not match the information provided in the Commission's YR-02 CWR dockets, or CAO's records. Without being able to verify which source of information was correct, Staff recommended that the Commission accept MERC's 2021 gas service quality report contingent on the Company's ability to resolve these errors by filing corrected data to all affected dockets. (April 12, 2023, Docket Nos. G002/M-22-210, G008/M-22-213, G022/M-22-193, G004/M-22-211, G-011/M-22-219)

[31] See March 8, 2021, Order Adopting Reports and requiring Filings in Docket No. E,G999/CI-20-375

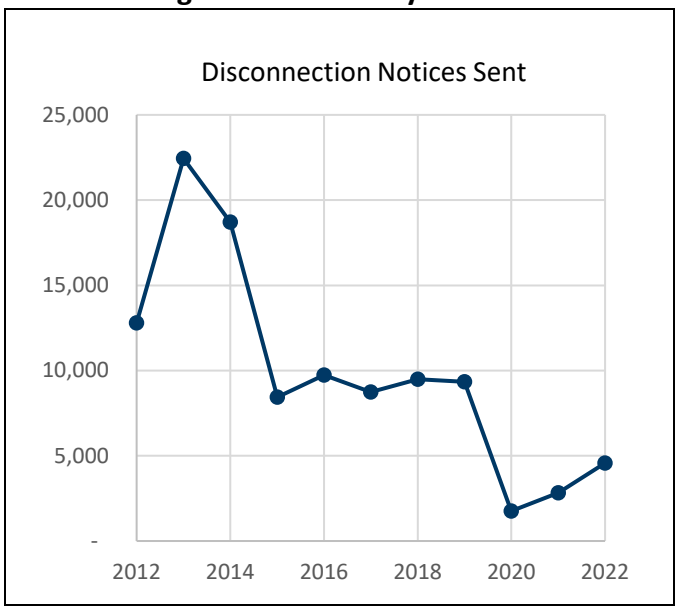
[32] Staff added emphasis.

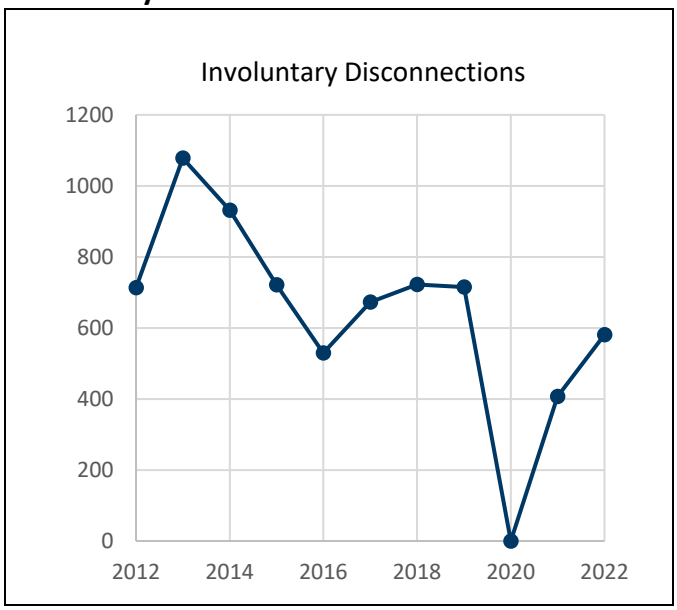
[33] Docket No. 23-80, MERC Service Quality Report, table 3, p.6.

IV. Great Plains

In figure 11 below, Staff provides a summary of Great Plains' involuntary service disconnection data.

Figure 11: Summary of Great Plains 2022 Involuntary Service Disconnection Data





Customers Receiving Disconnection Notices	% of CWR Requests Granted	Customers Disconnected Involuntarily	% of Disconnections Restored within 24 hours
4,571	100%	581	8%
^ 61%	No Change	^ 43%	

* pp = percentage point

Great Plains reported sending 4,571 disconnection notices and making 581 disconnections in 2022.[34]

A. Department Comments

The Department noted that Great Plains has consistently granted 100% of the CWR requests the Company receives. Although Great Plains recorded making more involuntary disconnections in 2022 than in 2021, the Company has yet to return to pre-pandemic levels.

B. Staff Analysis

Staff supports the Department's analysis. Consistent with prior comments, Staff will continue to monitor utilities' involuntary service disconnection data in 2023 to see if the percent of disconnections restored within 24 hours improves as we move further away from the pandemic

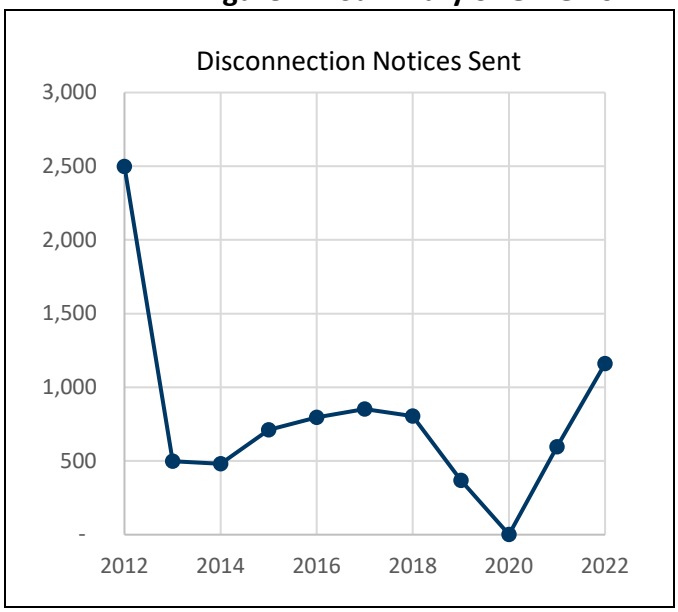
[34] Docket No. 23-78, Great Plains Service Quality Report, p.2

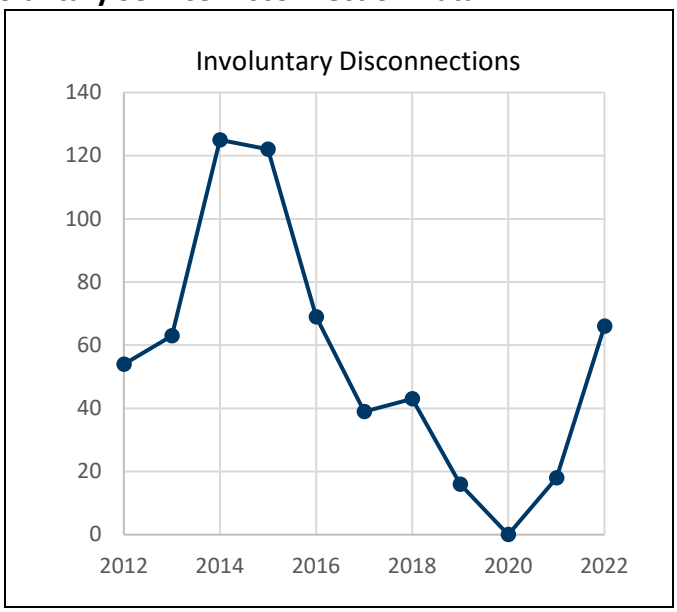
and the associated disconnection moratorium.

V. GMG

In figure 12 below, Staff provides a summary of GMG's involuntary service disconnection data.

Figure 12: Summary of GMG 2022 Involuntary Service Disconnection Data





Customers Receiving Disconnection Notices	% of CWR Requests Granted	Customers Disconnected Involuntarily	% of Disconnections Restored within 24 hours
1,160	N/A	66	17%
^ 95%	No Change*	^ 267%	v -27 pp**

* GMG reported no customers have sought CWR protection since 2019
** pp = percentage point

GMG reported making 66 involuntary service disconnections in 2022.

A. Department Comments

The Department highlighted the increase in GMG's involuntary disconnections, noting that the number of involuntary service disconnections in 2022 were at their highest since 2016. However, according to the Department, the involuntary service disconnection rate of 0.70% in 2022 was still comparable to previous years data. The Department concluded that GMG's involuntary service disconnection data for 2022 appears to be acceptable.

B. Staff Analysis

Staff supports the Department's analysis. Consistent with prior comments, Staff will continue to

monitor utilities' involuntary service disconnection data in 2023 to see if the percent of disconnections restored within 24 hours improves as we move further away from the pandemic and the associated disconnection moratorium.

SERVICE EXTENSION REQUESTS

The Commission's 09-409 Order requires all gas utilities to report data on service extension requests pursuant to Minn. Rules, part 7826.1600, items A and B:

- The number of customers requesting a service extension by customer class.
    - The interval between the date service was installed and the latter of the customer-requested in-service date or the date the premises were ready for service.
- The number of customers requesting service at a location previously served by the utility.
    - The interval between the date service was installed and the latter of the customer-requested in-service date or the date the premises were ready for service.

Additionally, the Commission's March 6, 2012 Order[35] requires utilities to report on the types of extension requests for both locations previously served and not previously served.

GMG was given alternative reporting requirements in an April 6th Order in Docket No. G022/M-15-1090 that reflect the Company's unique service extension model.[36] Per the April 6 Order, GMG must provide data on extensions to new service areas, the addition of new customers on existing mains, and a discussion of requests for changes in service to areas already served by the Company. The Commission also required GMG to provide copies of advertisements to potential new customers, the date that deposits were first taken for a new service area, and an explanation of why customers along existing mains were denied service.

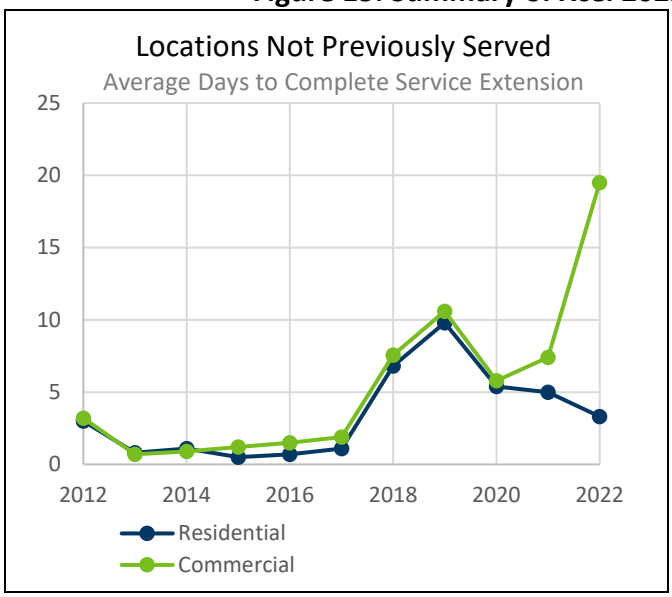
I. Xcel Energy

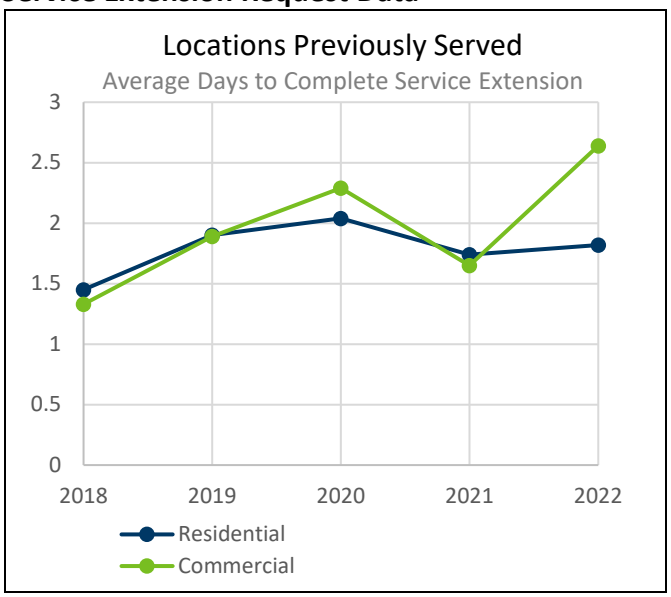
In figure 13 below, Staff provides a summary of Xcel's service extension performance.

[35] See 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

[36] GMG explained in its 2021 service quality report that when the Company extends service to a new area, it is generally extending service to an entire new rural area rather than to a new development on the edge of an existing service area. Therefore, GMG installs an entire new main to an area and then runs individual service off of it. When a new project is designed, which may be during the preceding fall or winter, GMG begins working with a community to engage its business and residential customers, essentially beginning to "sell" service and receive commitments many months in advance of the main installation. Customers are aware that the main will be installed several months later and that, after the main installation is complete, their individual services will be run. Because services are installed following main construction, a customer's installation is immediately ready for service upon completion of the service construction.

Figure 13: Summary of Xcel 2022 Service Extension Request Data





# of Extensions to Residential Locations Not Previously Served	# of Extensions to Commercial Locations Not Previously Served	# of Extensions to Previously Served Residential Locations	# of Extensions to Previously Served Commercial Locations
3,155	147	796	173
⌄ -10%	⌄ -22%	^ 23%	^ 47%

* pp = percentage point

Xcel noted that for its natural gas operations, the requests for service to locations that have previously been served but are not being served at the time of request are nearly all requests from customers who have had their meter locked due to credit.

Xcel stated that the continued decline of new service installations is likely due to economic challenges resulting from COVID-19, inflationary pressures, and material and supply issues. Xcel reported that supply chain constrains led to a 30% increase lead times for electrical materials. Additionally, Xcel stated that a process used to drive its efficiency and service lead-time reduction efforts was discontinued due to the manual tracking required of field personnel. The combination of these events caused an increase in service lead time for commercial extensions in 2022. To address this issue, Xcel stated it is exploring creating a new Service Lead-Time reduction process that field personnel can utilize through more automated channels.

A. Department Comments

The Department summarized the information provided by Xcel regarding service extension times and noted that although the number of reconnections for previously served residential and commercial locations increased in 2022, they remain below the pre-pandemic level of reconnections. The Department stated that the average number of days to complete reconnections has been more stable over the past five years than for new installations. The

Department concluded that Xcel met the service extension reporting requirements for 2022.

B. Staff Analysis

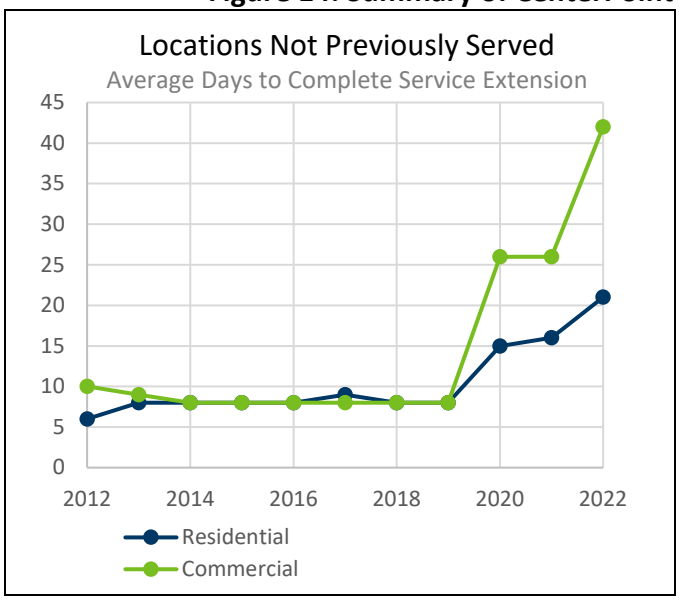
Staff agrees with the Department that Xcel has fulfilled its service extension request reporting requirements.

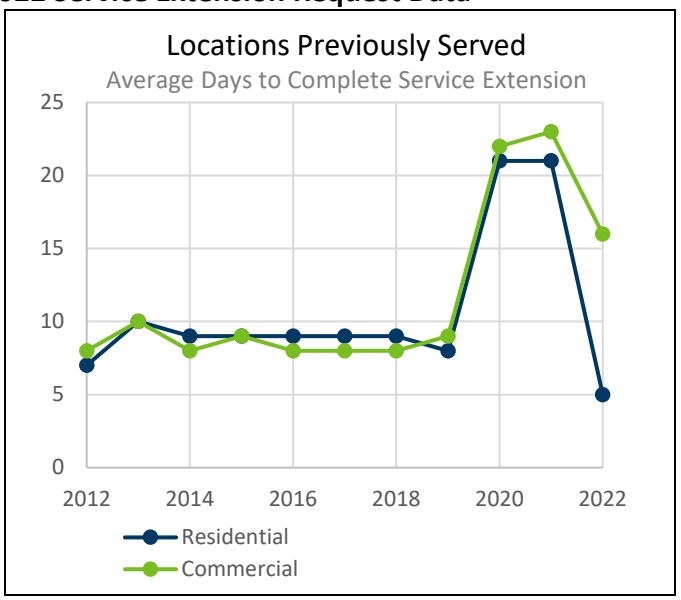
Staff notes that in 2018 Xcel began recording service extension information in its system, applications, and products (SAP) management system which allows it to capture service extension times more accurately. This change resulted in an apparent rapid increase to the average number of days required to complete service extension times in 2019. After this change, Xcel noted that the previously reported data will not be comparable to new reports.

II. CenterPoint

In figure 14 below, Staff provides a summary of CenterPoint's service extension performance.

Figure 14: Summary of CenterPoint 2022 Service Extension Request Data





# of Extensions to Residential Locations Not Previously Served	# of Extensions to Commercial Locations Not Previously Served	# of Extensions to Previously Served Residential Locations	# of Extensions to Previously Served Commercial Locations
6,824	668	19,677	1,524
⌄ -13.7%	^ 0.45%	^ 86.6%	^ 30.3%

CenterPoint reported that new residential extensions took an average of 21 days to complete in 2022 compared to an average of 16 days in 2021.[37] Renewed residential extensions took an average of 5 days to complete in 2022 compared to 21 days in 2021.

[37] Docket 23-79, CenterPoint Service Quality Report, p.3

Additionally, CenterPoint reported that new commercial extensions took an average of 42 days to complete in 2022 compared to an average of 26 days in 2021. Renewed commercial extensions took an average of 16 days to complete in 2022 compared to 23 days in 2021.

CenterPoint noted that the Company made reporting process changes for evaluating the average days to complete service extensions. Because of this, CenterPoint stated that its 2022 data would not be directly comparable with the data they provided in 2021.

A. Department Comments

The Department highlighted that, for CenterPoint's residential customers, the average number of days to complete installations for new service locations increased by 31% while the average number of days to complete service installations for previously served areas decreased by 75% in 2022. For Commercial customers, the average number of days to complete installations for new service locations increased by 62% and the average number of days to complete installations for previously served locations decreased by 30% in 2022.

The Department noted that CenterPoint had previously explained that the increase in Installation times from 2019 through 2021 was due to COVID impacts and restrictions.[38] In 2022, CenterPoint stated that the increase installation times were due to reporting process changes. The Department reached out to CenterPoint via email for an explanation and received the following response:

> The Company updated previous reporting to address internal work order status standardization for how the data is pulled for this report. The Company has two applications in managing these work orders: one is the primary application and the other is a mobile system construction crews are able to utilize when working in the field. The reporting changes that were made were to standardize the data for the window of time measure for "Time to Complete," when able, across the two applications. [39]

In 2022 CenterPoint's renewed installation times began to decrease despite a drastic increase in the quantity of renewed service installations. The Department asked CenterPoint if the reporting changes made by the company affected the number of renewed service installations reported by the Company, and received the following response:

> The Company previously updated the data parameter filters for the data extraction from our system to include additional job types that fall under the "renewed" service umbrella. These additional job types under "renewed" service installations included replacements, extensions, and test and connects. The changes from 2021 to 2022 do not appear to have significantly impacted the job code mapping changes to cause an increase to the Renewed

[38] See May 7, 2021, Compliance filing in Docket No. G008/M-21-303.

[39] Docket No. 23-79 Department Comments, Attachment 1

Service Installations.[40]

The Department concluded that CenterPoint has met the Commission's service extension reporting requirements for 2022.

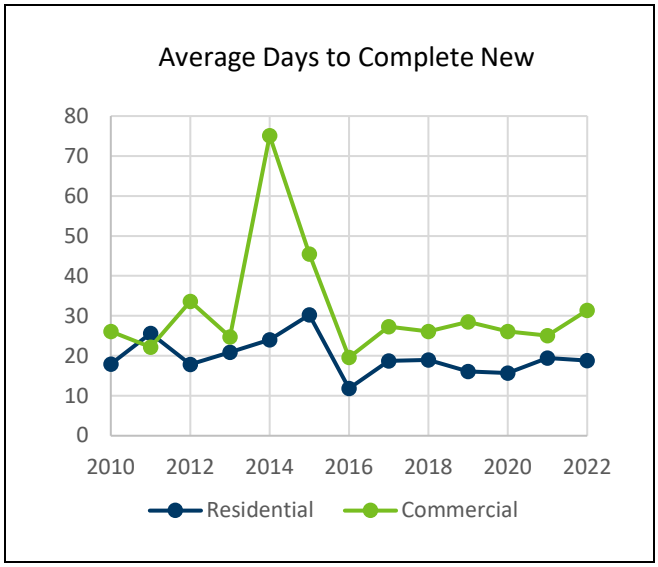
B. Staff Analysis

Staff supports the Department's analysis and does not recommend additional action at this time.

III. MERC

In figure 15 below, Staff provides a summary of MERC's service extension performance.

Figure 15: Summary of MERC 2022 Service Extension Request Data



# of Extensions to Residential Locations Not Previously Served	# of Extensions to Commercial Locations Not Previously Served
2,208	259
-12.6%	-1.9%

# of Extensions to Previously Served Residential Locations	# of Extensions to Previously Served Commercial Locations
4,823	316
7.2%	-34%

Staff notes that MERC does not provide a narrative to explain its 2022 service extension request performance but does provide definitions for "new installs"[41] and "existing installs"[42] and briefly explains the types of extension requests the Company receives for both.[43]

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[40] Id.

[41] MERC stated that new installs represent new service requests at locations where no gas service exists, either because the location is a new construction or because an alternate fuel source has been used previously.

[42] MERC stated that an existing install represents any building that has previously had natural gas service, but that service has been disconnected.

[43] On page 7 of its Service Quality Report in Docket No. 23-80, MERC explained, "For locations not previously served, new service requests are either related to customers with new construction or customers requesting service to convert to natural gas. For locations previously served, new service requests consist of requests to turn

A. Department Comments

The Department stated that the number of extension requests for both newly and previously served locations has fluctuated over time. Additionally, the Department noted the average number of days to complete service installations has varied from year to year for newly served locations, but previously served locations have consistently had service restored within one day (on average).

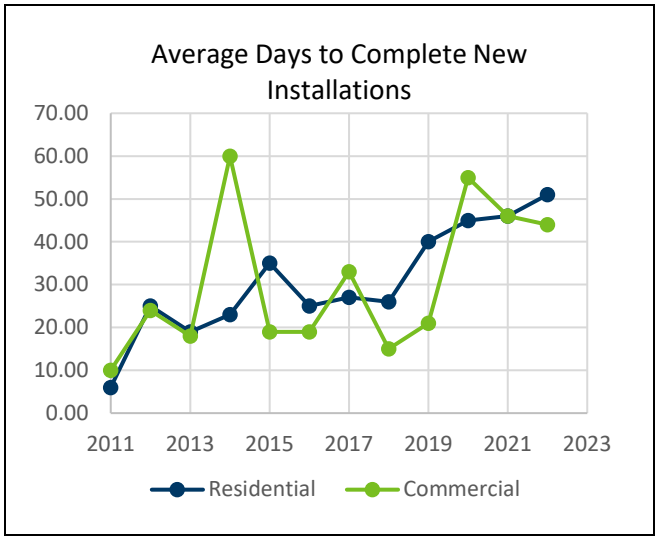
B. Staff Analysis

Staff notes that MERC has fulfilled its, service extension request reporting requirements for 2022.

IV. Great Plains

In figure 16 below, Staff provides a summary of Great Plains' service extension performance.

Figure 16: Summary of Great Plains 2022 Service Extension Request Data



# of Extensions to Residential Locations Not Previously Served	# of Extensions to Commercial Locations Not Previously Served
77	24
-13.5%	9%

# of Extensions to Previously Served Residential Locations	# of Extensions to Previously Served Commercial Locations
709	138
-0.7%	18%

Great Plains reported receiving 101 new service extension requests and 847 reconnection or renewed service extension requests in 2022.[44] The Company explained that the renewed service extension statistics do not include reconnection of service to customers disconnected by the Company for non-payment. Great Plains stated that for new service installations, the Company tracks the service line application date but has not tracked the date the property is

on service after the service was disconnected at the previous customer's request. Reconnections occurring after disconnections for non-payment are not included in MERC's response.

[44] Docket No. 23-78, Great Plains Service Quality Report, p.2.

ready for service line installation, therefore their report reflects the time from completion of the service line installation to the date the meter was installed. For reinstallations, the Company reported that, on average, meters were installed on the same day the customer requested the installation of a meter.

A. Department Comments

The Department stated that the number of service extension requests reported by Great Plains for new and previously served locations fluctuates over time. Although the installation time to newly served locations varies from year to year, the time required to provide service to previously served locations has remained steady over time. The Department concluded that Great Plains met the Commission's service extension reporting requirements for 2022.

B. Staff Analysis

For the fourth year in a row, Great Plains recorded a record high for the average number of days needed to complete new residential service extensions. At the same time, the number of residential extension requests has declined. Staff will continue to monitor Great Plains' service extension data in 2023.

V. GMG

In 2022, GMG continued to focus on extending service to customers within its existing territories, instead of expanding its territory with new main extension projects.[45] Because the Company did not undertake any new area main extension projects in 2022, it did not distribute any advertisements or solicitations to potential new customers and thus did not include any such advertisements as a part of its 2022 service quality report.

GMG focused on on-main customers who do not currently use gas. The company received a total of 374 residential service requests and 62 firm commercial service requests, which took an average of 18 days and 17 days to complete, respectively.

Regarding customers requesting service to a location previously served by GMG, the Company does not believe that there were any delays in the premises being ready for service. GMG does not lock or stop service between transfers of property owners or occupants. Responsibility for the customer account is transferred on the date agreed by both parties to the transfer.

A. Department Comments

The Department noted that 2022 was the fourth year since GMG began reporting its service extension data in 2016 that the Company had not extended service to a new area. The Department noted that because GMG had not denied service to any customers, the Company did not include any explanations as to why customers were denied service when requested.

[45] Docket No. 23-81, GMG Service Quality Report, pp. 4-5.

The Department stated that the on-main service extension times for 2022 were similar to extension times in previous years. Given the lack of extension-related complaints received in 2022 the Department concluded that GMG had reasonably delt with service requests in 2022.

B. Staff Analysis

Staff supports the Department's analysis and agrees that GMG fulfilled its service extension reporting requirements. Staff does not recommend additional action at this time.

CUSTOMER DEPOSITS

The Commission's 09-409 Order requires utilities to report on customer deposits pursuant to Minn. Rules part 7826.1900:

- The number of customers who were required to make a deposit as a condition of receiving service.

Additionally, the Commission's March 6, 2012 Order[46] requires utilities to report on the different types of deposits included in the reported number of "required customer deposits."

I. Xcel Energy

Xcel noted that in 2022 they requested 237 deposits as a condition of service for customers who had filed for bankruptcy, which is inclusive of both their natural gas and electric operations.[47] These deposits are requested upon notification from the bankruptcy court, and/or customers of their bankruptcy petitions. Xcel stated that once customers file for bankruptcy, their service begins anew, and the deposit amount is included in their first bills. Deposits are not requested of customers for reconnection of service.

A. Department Comments

The Department noted that the 237 deposits collected by Xcel in 2022 represents a 59.35% decrease from the 583 deposits collected in 2021. The Department acknowledged Xcel fulfilled its Customer Deposit Reporting Requirements.

B. Staff Analysis

Staff supports the Department's analysis and does not recommend additional action at this time.

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[46] See 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.

[47] Docket 23-77, Xcel Service Quality Repot, p.9.

II. CenterPoint

As of December 31, 2022, CenterPoint reported holding a total of 1,637 deposits that were required as a condition of service.[48] The Company noted that deposits are required as a condition of service for customers that are subject to disconnection or have been disconnected for non-payment. The current policy for deposits is limited to commercial accounts. In 2022 CenterPoint required 316 new deposits as a condition of service compared to 284 in 2021.

A. Department Comments

According to the Department, in 2022 less than 1% of the total number of service connections performed by CenterPoint involved the customer making a deposit. The Department concluded that CenterPoint fulfilled its customer deposit reporting requirements for 2022.

B. Staff Analysis

CenterPoint required roughly 11% more deposits in 2022 than they did in 2021. However, the number of deposits required in 2022 was 23% less than the five-year average of 411.4 deposits. Staff agrees with the Department that CenterPoint has fulfilled its customer deposit reporting requirements and does not recommend any additional action at this time.

III. MERC

MERC stated that it did not collect any new deposits in 2022 as a condition to receive service.[49] In total, the Company held 12 deposits at the end of 2022. MERC stated that it suspended the collection of deposits in 2017 after discovering that it collected from low-income customers in violation of the Company's policy, and that the deposits collected were higher than allowed under MERC's tariff.

A. Department Comments

Staff notes that the Department summarized MERC's comments and provided a data table displaying the Company's customer deposit data over time.[50]

B. Staff Analysis

As reported by the Company, MERC has made no customer deposits since 2017. The number of deposits held by the Company has decreased steadily from 88 in 2017 to 12 in 2022. Staff notes that MERC has fulfilled its customer deposit reporting requirements for 2022.

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[48] Docket 23-79, CenterPoint Service Quality Report, p.3.

[49] Docket No. 23-80, MERC Service Quality Report, pp. 7

[50] Docket No. 23-80, Department Comments, p.9

IV. Great Plains

Great Plains stated that it did not require a deposit as a condition of receiving new service in 2022.

A. Department Comments

The Department concluded that Great Plains fulfilled its customer service deposit reporting requirements for 2022.

B. Staff Analysis

Staff supports the Department's analysis and does not recommend additional action at this time.

V. GMG

In 2022, GMG required one customer to make a deposit as a condition of receiving service. GMG stated that it required this deposit "based on the terms identified in GMG's tariff due to a history with GMG demonstrating consistently poor payment records and poor credit, including multiple disconnections due to non-payment."[51] GMG explained it does not require deposits from new customers. Deposits held by GMG are returned after twelve months of timely payments. The Company reported holding 9 deposits in 2022.

A. Department Comments

The Department noted that the number of new customer deposits increase steadily for three years beginning in 2012 but has decreased in recent years and remains well below the 2014 high of 13 deposits.

B. Staff Analysis

Staff notes that GMG has fulfilled its customer deposit reporting requirements and does not recommend additional action at this time.

CUSTOMER COMPLAINTS

The Commission's 09-409 Order requires utilities to report on customer complaints pursuant to Minn. Rules part 7826.2000:

- The number of complaints received;
- The number and percentage of complaints alleging billing errors, inaccurate metering, wrongful disconnection, high bills, inadequate service, and the number involving service extension intervals, service-restoration intervals, and any other identifiable subject matter involved in five percent or more of customer complaints;

[51] Docket No. 23-81, GMG Service Quality Report. p.5

- The number and percentage of complaints resolved upon initial inquiry, within ten days, and longer than ten days;
- The number and percentage of all complaints resolved by taking any of the following actions:
    - Taking the action the customer requested.
    - Taking an action the customer and the utility agree is an acceptable compromise.
    - Providing the customer with information that demonstrates that the situation complained of is not reasonably within control of the utility.
    - Refusing to take the action the customer requested; and
- The number of complaints forwarded to the utility by the commission's Consumer Affairs Office for further investigation and action.

Additionally, the Gas Utilities were required by the Commission's March 6, 2012 Order[52] to reconcile gas-related call center complaints with the categories contained in Minn. Rules part 7826.2000.[53]

I. Xcel Energy

In figure 17 below, Staff provides a summary of Xcel's customer complaint data.

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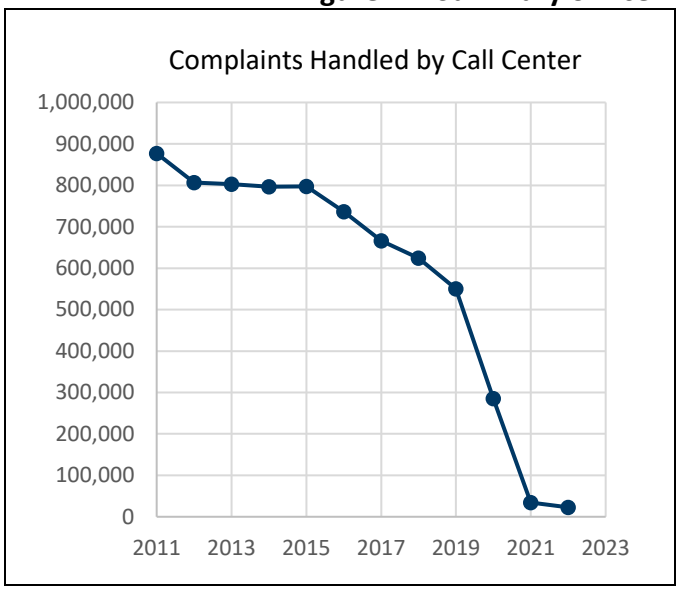
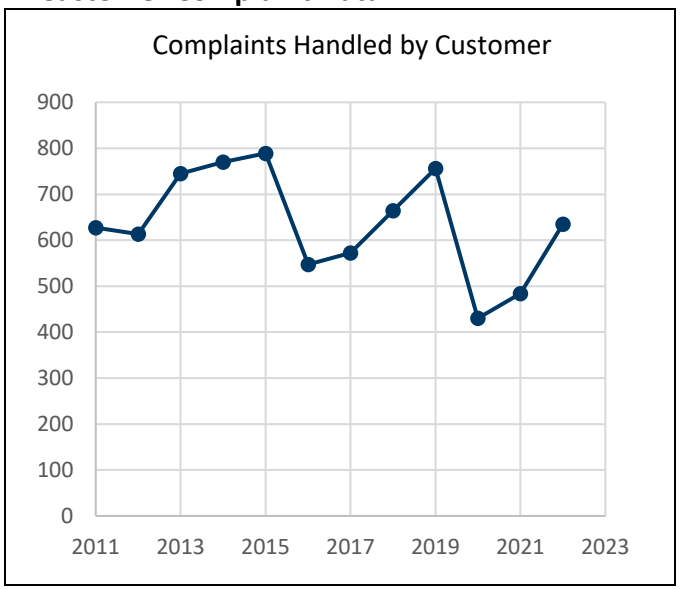
[52] See Docket Nos. G002/M-11-360, G-001/M-11-361, G-004/M-11-363, G-007,011/M-10-374, G-008/M-10-378, and G-022/M-11-356.

[53] Categories include billing errors, inaccurate metering, wrongful disconnection, high bills, inadequate service, service-extension intervals, service-restoration intervals, and any other identifiable subject matter involving 5% or more of customer complaints.

Figure 17: Summary of Xcel 2022 Customer Complaint Data





Complaints handled by Call Center 22,792 -34%	% of Complaints Handled by Call Center Resolved by Agreeing with Customer 94% -2 pp*	Complaints handled by CAG 635 31%	Complaints to CAG Resolved on Initial Inquiry 9% -1.7 pp
	% of Complaints Handled by CAG Resolved by Taking Customer-Requested Action 32% No Change	Complaints forwarded by CAO 330 28%	

* pp = percentage point

Xcel noted that it provides information for complaints handled by its Customer Advocate Group (CAG) and complaints handled upon initial inquiry in the Call Centers. The information provided by Xcel includes data for both its natural gas and electric operations. A work group consisting of Commission Staff, CAO, the Department of Commerce, Xcel, Minnesota Power, and Otter Tail Power met to discuss service quality complaint categories over the course of 2021 and into 2022. Xcel reported that this work group ultimately agreed that additional detail should be provided for the "inadequate Service" complaint category. Xcel stated that beginning with its 2023 service quality report (filed in 2024), the company will break the inadequate service complaint category into the following sub-categories:

- Inadequate Service – Field/Operations;

- Inadequate Service – Customer Service;
- Inadequate Service – Programs and Services; and
- Inadequate Service – Cold Weather Rule Protection.

Staff notes that Xcel also provided information on its progress toward reporting Distributed Energy Resource (DER) complaints as required by the Commission's November 9th, 2022 Order in Docket No. E002/22-162. However, Staff has not summarized this information here, as DER complaints are specific to the company's electricity services.[54]

A. Department Comments

The Department noted that the number of complaints handled by Xcel's CAG has increased over the last two years while the number of complaints handled by Xcel's call centers have decreased significantly. The majority of Xcel's complaints fell within the "inadequate service" and "billing error" categories.

The significant drop in complaints received by Xcel's call centers was attributed to a reduction in call volume and new documentation procedures implemented in late 2020 that reduced the length of phone calls and allowed Xcel to serve customers more efficiently. These new procedures included "no longer recording inquiries that are not actual complaints."

The Department acknowledged Xcel's fulfillment of its complaint reporting requirements but requested that Xcel begin including annual totals for call center data in future Gas Service Quality Reports.

Staff notes in its reply comments, Xcel agreed to include annual totals for call center data in future Gas Service Quality Reports.

B. Staff Analysis

As noted by the Department, the drop in complaints to Xcel's call centers has been attributed to a reduction in call volume and new documentation procedures implemented in late 2020. In their 2020 service quality report, Xcel described this change as one of several ways the Company adjusted its procedures in response to COVID-19:

> "As all this was occurring, we implemented multiple strategies to address the issues we were encountering. For many months, we used special messaging within our IVR to efficiently provide information to customers and guide them to conduct transactions within the IVR or online. We saw a very positive customer response to these actions.
>
> We worked with our vendor partners and our in-house technology staff to identify and resolve performance issues in our computing environment. We offered incentives to our

[54] For more information on Xcel's DER complaint reporting, please see Xcel's 2022 Electric Service Reliability and Service Quality Report (SRSQ) filed on March 31, 2023, in Docket No. E002/M-23-73

> employees to work overtime and augmented our call center staffing with employees from other areas within our Customer Care organization. We suspended non-essential activities and implemented new procedures to reduce the length of calls and enable us to more effectively serve customers."[55]

With the end of the disconnection moratorium in August of 2022, Staff anticipated an increase in the number of complaints utilities would receive in 2022 compared to 2020 and 2021. Complaints handled by Xcel's CAG continue to require more time to resolve. For the second consecutive year, Xcel reported an all-time low of 9% for the percentage of CAG complaints resolved on initial inquiry. Unlike last year, the Company also saw an increase in the percent of complaints resolved in 10 or more days, with Xcel reporting an all-time high of 7%. Staff notes that the time required to resolve complaints may be a result of the complexity of the complaint, and the volume of complaints being handled by CAG within a given month.

In 2022, 52% of complaints handled by CAG were categorized as "inadequate service." The second most frequently used complaint category was "billing errors" representing 23% of total complaints handled by CAG. Staff notes Xcel's top complaint categories have been consistent since 2011.

According to CAO's records, Xcel over reported the number of complaints forwarded to them by CAO. In 2022, Xcel reported that they received 330 complaints from CAO, whereas CAO reported sending 303 complaints to Xcel. Staff has recommended that the utilities work with CAO in the future to ensure that their records are consistent with one another.

Staff agrees with the Department that Xcel fulfilled its customer complaint reporting requirements but will monitor the number of complaints requiring more than 10 days to resolve in future service quality reports.

II. CenterPoint

In figure 18 below, Staff provides a summary of CenterPoint's customer complaint data.

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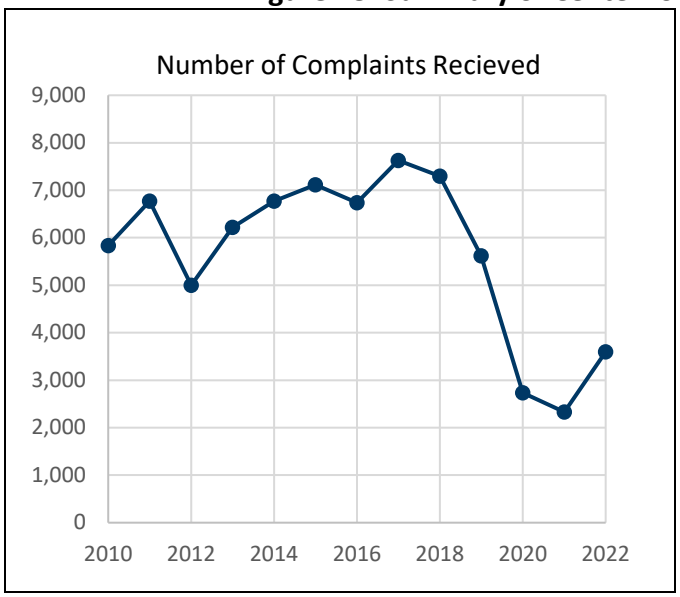
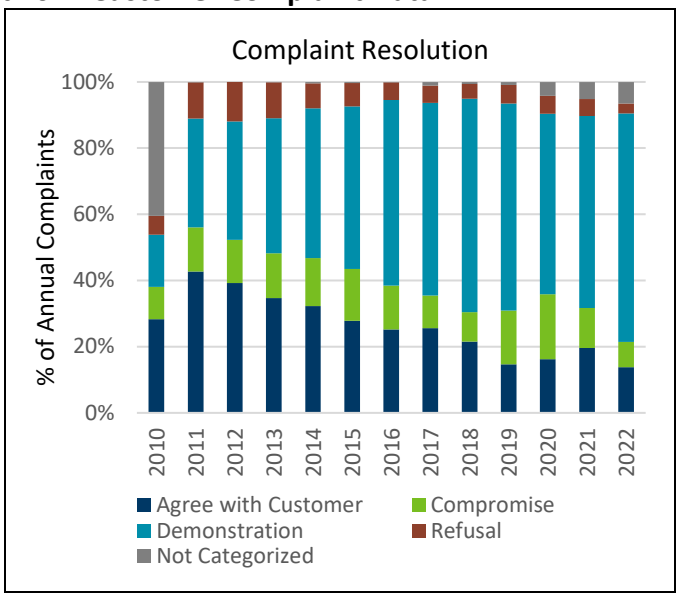
[55] Docket 21-301, Xcel 2020 Service Quality Report, p.3

Figure 18: Summary of CenterPoint 2022 Customer Complaint Data





Complaints Received	% of Complaints resolved on initial inquiry	% of Complaints Resolved by refusal	Complaints forwarded by CAO
3,597	74%	3%	166
^ 54%	^ 7 pp*	v -2pp	^ 100%

* pp = percentage point

CenterPoint reported that in 2022 the three most frequent complaint types were service issues, disputed charges, and payment issues.[56] The most frequent complaint types in 2021 were service issues, disputed charges, and billing errors. CenterPoint reported that 75% of residential complaints and 56% of commercial complaints were resolved immediately in 2022 compared to 69% and 25% in 2021, respectively.

A. Department Comments

The Department anticipated that the annual number of complaints received by CenterPoint, and the number of complaints forwarded by CAO, would return to normal levels in 2021. However, that did not happen. Instead, it was in 2022 that CenterPoint's complaints began returning to normal due to the end of the disconnection moratorium.

The Department highlighted that the number of complaints forwarded by CAO doubled in 2022 compared to 2021. Additionally, the percentage of complaints forwarded by CAO compared to the total number of complaints received by CenterPoint has been increasing since 2018. The Department will monitor the number of CAO forwarded complaints in CenterPoint's 2023 Service Quality Report.

[56] Docket No. 23-79, CenterPoint Service Quality Report, p.4.

The Department stated that since 2012, CenterPoint has been able to resolve most complaints by either agreeing with the customer or demonstrating to the customer that the circumstance of the complaint was beyond the Company's control. However, the Department noted concern over decreases in the percent of complaints resolved by agreeing or compromising with the Customer. The Department stated that it believes that the ending of the disconnection moratorium is the driver for the decrease in agreements and compromises with customers. However, The Department stated that it will monitor these metrics in upcoming filings to ensure that this is not a trend.

The Department explained that CenterPoint's complaint categories contain subcategories. Since 2013, the Company's "Billing Errors" category has captured approximately 40% of reported complaints each year while the "Inaccurate Meter Reading" category consistently represents the fewest number of customer complaints.

The Department concluded that CenterPoint has fulfilled its complaint reporting requirements for 2022.

B. Staff Analysis

Staff found that CenterPoint under reported the number of complaints they received from CAO in 2022. CenterPoint reported receiving 166 complaints from CAO while CAO reported forwarding 217 complaints to CenterPoint. Staff recommends the Gas Utilities work with CAO to ensure their records are consistent with one another.

Staff supports the Department's analysis and agrees that CenterPoint has fulfilled its complaint data reporting requirements.

III. MERC

In figure 19 below, Staff provides a summary of MERC's customer complaint data.

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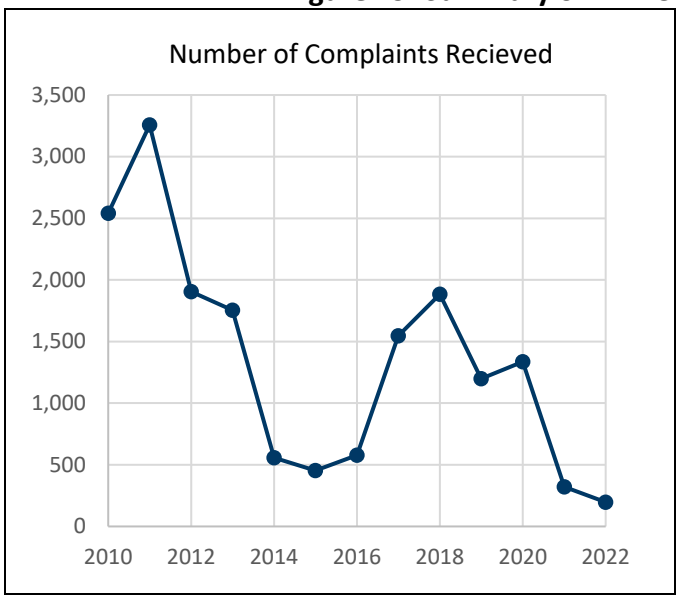
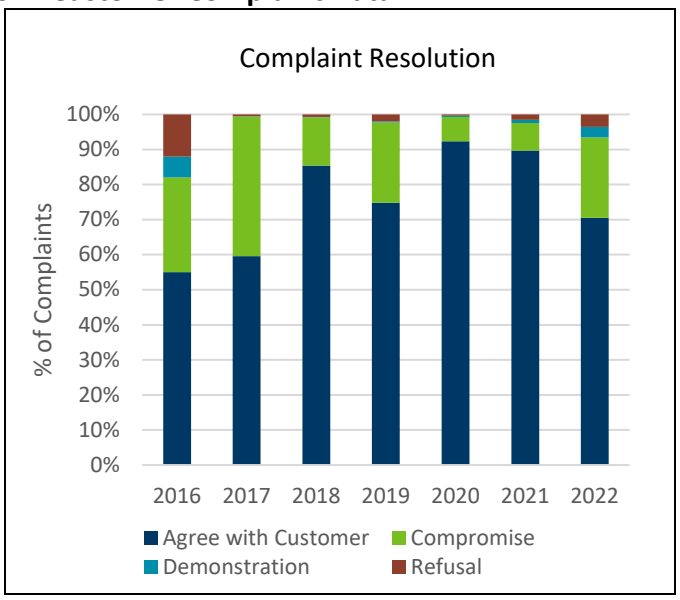
Figure 19: Summary of MERC 2022 Customer Complaint Data





Complaints Received	% of Complaints resolved on initial inquiry	% of Complaints Resolved by refusal	Complaints forwarded by CAO
197	6%	4%	45
⌄ -39%	⌄ -58 pp*	^ 2pp	^ 80%

* pp = percentage point

MERC highlighted that the Company received "significantly fewer complaints" in 2022 compared to previous years.[57] The Company stated that this decrease is likely due to the continued training of call center staff and the implementation of AMI, which has reduced the number of billing and meter reading complaints.

MERC explained that in 2017, MERC changed the methodology used to track complaints, and continued training on the updated methodology in 2018. According to MERC, its call center staff have been trained to identify when customers are not satisfied, and to recognize when customers call multiple times. In these instances, a MERC call center supervisor performs a call back and all call backs are tracked as a complaint.

A. Department Comments

The Department noted that in 2022, the number of complaints received by MERC that were resolved on initial inquiry was significantly lower than any other year and requested that MERC provide an explanation for this anomaly. In response, MERC stated:

> In 2022, MERC discovered that the Call Center was not properly logging complaints as

[57] Docket No. 23-80, MERC service quality report, p.8.

> "first call resolution." First call resolutions are customer complaints that are resolved immediately upon the customer's first call into the Company, and all other complaints are calls that require more assistance and response from the Company. First call resolutions would be categorized on Attachment 5 as being resolved "Initially" and remaining complaints would be categorized on Attachment 5 as either resolved "Within 10 days" or "> 10 days," accordingly. The improper logging of first call resolution complaints caused MERC to under-report complaints in 2022 that were immediately resolved. MERC has worked with the Call Center on this issue, which included additional training of Call Center agents to correctly log first call resolution complaints.[58]

The Department stated that it appreciated MERC's continuous work on improving customer complaint documentation.

B. Staff Analysis

Staff notes that MERC was required by the Commission's May 1st, 2023 Order to begin reporting complaints due to "wrongful disconnects" beginning with its 2023 service quality report. Staff previously noted that although all utilities were required to report complaints consistent with the categories listed in Minn. R. 7826.2000, MERC had not been reporting complaints due to "wrongful disconnects."

In 2022, MERC received a record low 197 complaints. High Bills and Billing/meter reading errors were responsible for 37% and 25% of MERC's 2022 complaints, respectively.

Staff found that MERC under reported the number of complaints they received from CAO in 2022. MERC reported receiving 45 complaints from CAO while CAO reported forwarding 74 complaints to MERC. Staff recommends the Gas Utilities work with CAO to ensure their records are consistent with one another.

Staff supports the Department's analysis and notes that MERC fulfilled its complaint reporting requirements for 2022.

IV. Great Plains

Great Plains reports that there were eight customer complaints in 2022 that were escalated to a supervisor for resolution, a decrease of 4 from 2021. Four of the eight customer complaints were forwarded by CAO, and all eight complaints were resolved immediately.

A. Department Comments

The Department noted that starting in 2013 Great Plains began providing more comprehensive data on customer complaints in its annual service quality reports. This data shows that Great Plains recorded 5,284 total customer complaints or concerns in 2022 compared to 7,165 in

[58] Docket No. 23-80, Department Comments, Attachment 1.

2021. Of these total complaints, 50% were resolved by demonstrating that the circumstances were outside of the Company's control, and 35% were resolved by agreeing with the customer.[59] The Department concluded that Great Plains met the Commission's customer complaint reporting requirements for 2022.

B. Staff Analysis

Staff found that Great Plains over reported the number of complaints they received from CAO in 2022. Great Plains reported receiving 4 complaints from CAO while CAO reported forwarding 2 complaints to Great Plains. Staff recommends the Gas Utilities work with CAO to ensure their records are consistent with one another.

Staff supports the Department's analysis and agrees that Great Plains met its customer complaint reporting requirements for 2022.

V. GMG

GMG explained that it considers something a customer complaint if, after speaking with the customer service representative regarding their inquiry, the customer requests that GMG take some type of action to resolve a particular problem or situation. In such an instance, the Company explained that the matter is immediately escalated to a supervisor with the authority to respond to the customer's issue.

In 2022, GMG reported that no complaints were forwarded from the Commission's Consumer Affairs Office or the Office of the Attorney General. Additionally, GMG stated that it did not have dissatisfied customers that requested supervisory escalation of a matter.

A. Department Comments

After reviewing GMG's explanations, the Department concluded that the company's complaint response was adequate.

B. Staff Analysis

GMG accurately reported the number of complaints it received from CAO in 2022. Staff believes GMG has fulfilled its 2022 complaint reporting requirements and does not recommend additional action at this time.

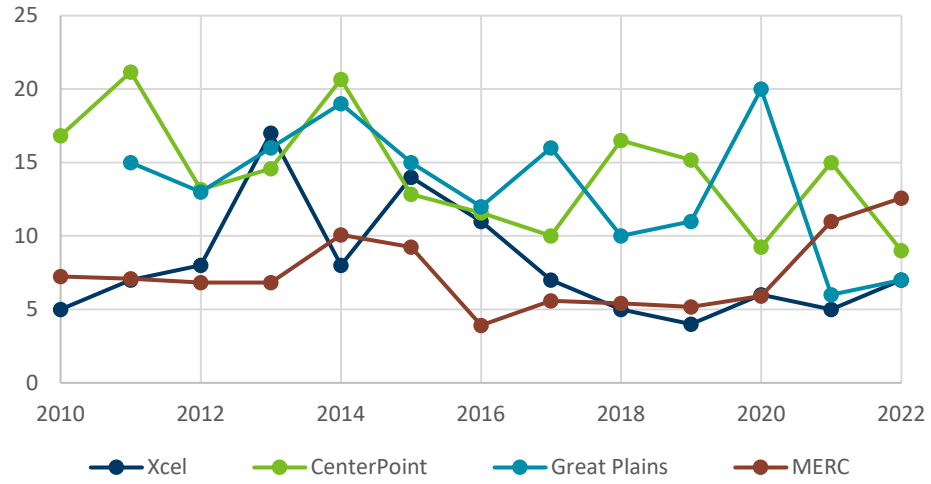
EMERGENCY CALL ANSWER SPEED

The Commission's 09-409 Order requires gas utilities to report the answer time to the utility's gas emergency phone line.

[59] Docket No. 22-78, Department Comments, p.8, Table 5(b).

Because GMG does not have a telephone line dedicated to gas emergency calls, the Commission requires GMG[60] to report the total number of gas emergency calls received.

Figure 20: Average Gas Emergency Call Answer Time (sec)



I. Xcel Energy

Xcel reported its emergency call telephone response time in attachment G of its report and includes gas emergency calls to all customer service phone lines[61] as well as those forwarded to the gas emergency line. The Company reported that in 2022, 87.2% of gas emergency calls were answered within 20 seconds.[62]

A. Department Comments

The Department acknowledged Xcel's fulfillment of the Commission's emergency call reporting requirements.

B. Staff Analysis

Staff notes that Xcel's average answer speed for all gas emergency calls in 2022 was seven seconds, a two second increase from 2021. The average answer speed of gas emergency line calls in 2022 was eleven seconds, an increase of four seconds from 2021.

Staff agrees with the Department that Xcel fulfilled its gas emergency call reporting requirements and does not recommend additional action at this time.

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[60] January 18, 2011, Order, Docket 09-409, Order Paragraph 1j

[61] This includes calls to Xcel's general customer service line, business line, electric outage line, and gas emergency line.

[62] Docket No. 23-77, Xcel Service Quality Report, p.13.

II. CenterPoint

CenterPoint reported that 92% of gas emergency calls received in 2022 were answered in 20 seconds or less, compared to 89% in 2021.[63] The Company reported an average answer speed of nine seconds in 2022, a six second decrease from 2021.

A. Department Comments

The Department stated that CenterPoint has consistently responded to its emergency phone calls in 20 seconds or less and concluded that CenterPoint had met the Commission's gas emergency phone call reporting requirements for 2022.

B. Staff Analysis

Staff supports the Department's analysis and agrees that CenterPoint fulfilled its gas emergency call reporting requirements. Staff does not recommend any additional action at this time.

III. MERC

MERC reported an average emergency phone call answer speed of 15 seconds in 2022. The Company also reported that 83% of emergency calls were answered in 15 seconds or less. Staff notes that MERC does not provide a narrative to accompany this data.

A. Department Comments

The Department noted that MERC saw a significant increase in the number of emergency phone calls received in 2022 compared to 2021. The increased call volume likely played a role increased time required to answer emergency calls in 2022. However, the Department noted that MERC's average emergency call response time has continued to remain below fifteen seconds.

B. Staff Analysis

For the second year in a row, MERC recorded a record high average emergency phone call answer speed and a record low percent of emergency calls answered in 15 seconds or less.

Staff notes that MERC's internal performance goal of answering emergency phone calls in 15 seconds or less is the most aggressive goal among the five Gas Utilities that are required to report on gas service quality.[64] Additionally, despite the drop in the percent of calls answered within 15 seconds or less, MERC's average emergency call answer speed is comparable with the average answer speeds reported by the other gas utilities in the past.

Staff notes that MERC fulfilled its emergency call answer speed reporting requirements for

[63] Docket No. 23-79, CenterPoint Service Quality Report, p.5.

[64] Xcel, CenterPoint, and Great Plains attempt to answer emergency calls within 20 seconds.

2022. Staff does not recommend additional action at this time.

IV. Great Plains

Great Plains reported that 83.6% of emergency calls received in 2022 were answered within 20 seconds representing a roughly two percentage point decrease from 2021.[65] The Company's average answer speed increased from six seconds in 2021 to seven seconds in 2022.

A. Department Comments

The Department reported that aside from 2014, Great Plains has consistently answered greater than 80% of calls in 20 seconds or less. The Department highlighted that the number of emergency calls received by Great Plains has been trending downward since 2014. The Department's Table 6 shows that in 2014 Great Plains recorded 1,702 emergency calls compared to 616 in 2022. The Department concluded that Great Plains met the Commission's gas emergency phone call reporting requirements for 2022.

B. Staff Analysis

Staff supports the Department's analysis and does not recommend additional action at this time.

V. GMG

In 2022, GMG reported receiving 380 gas emergency calls, of which 368 were non-line hit calls and 12 were line-hit related.[66]

A. Department Comments

Staff notes that the Department combined their analysis of GMG's emergency response call center data and its emergency response time data. Most of this analysis was focused on GMG's emergency response time, due to the limited information the Company provided regarding emergency response calls. For this reason, Staff will describe the Department's analysis in the next section of this briefing paper on Gas Emergency Response Times.

B. Staff Analysis

The 380 emergency calls received by GMG in 2022 was approximately 60% greater than the five-year average of 237 emergency calls. Staff notes that GMG fulfilled its emergency response call answer speed reporting requirements and does not recommend additional action at this time.

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[65] Docket No. 23-78, Great Plains Service Quality Report, pp.5-6.

[66] Docket No. 23-81, GMG Service Quality Report, p.7.

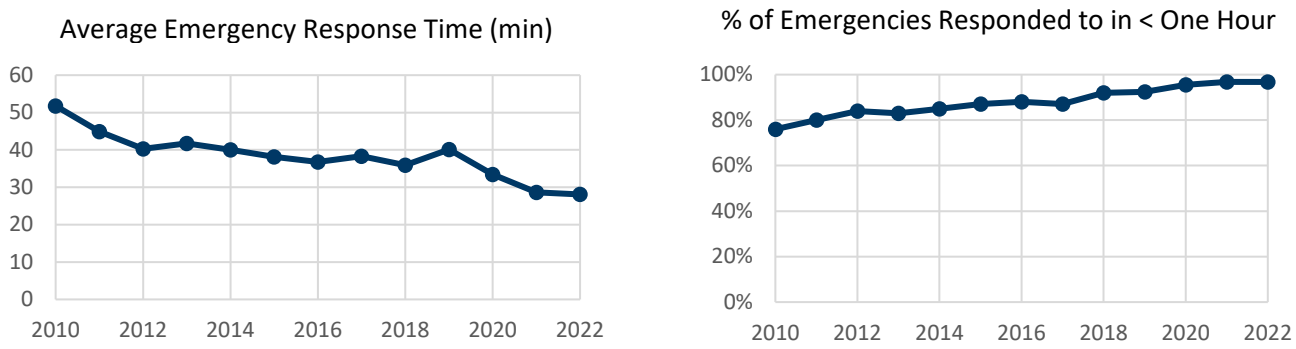
GAS EMERGENCY RESPONSE TIMES

The Commission's 09-409 Order requires the Gas Utilities to report the percent of emergencies responded to within one hour and within more than one hour; and requires Xcel, CenterPoint, and MERC to report the average number of minutes it takes to respond to an emergency.

I. Xcel Energy

In figure 21 below, Staff provides a summary of Xcel's gas emergency response performance.

Figure 21: Summary of Xcel's 2022 Gas Emergency Response Performance



In 2022 Xcel reported an average emergency response time of 28.09 minutes. The Company noted that it provides its natural gas emergency response time results under its quality of service plan ("QSP") tariff within its service quality report. A summary of these performance results is also submitted to the Commission as a part of the Company's Annual Report – Tariff Service Quality Plan filed on April 29, 2022, in Docket Nos. E,G002/CI-02-2034 and E,G002/M-12-383.

A. Department Comments

The Department noted that Xcel has improved its average response time over the last ten years. The Company has seen a 13.64 minute improvement over the average response time reported in 2013. The Department acknowledged that Xcel fulfilled its emergency response time reporting requirements but requested that Xcel begin including annual totals for gas emergency response times in future Gas Service Quality Reports.

Staff notes that in its reply comments, Xcel agreed to begin including annual totals for gas emergency response time data in future Gas Service Quality Reports.

B. Staff Analysis

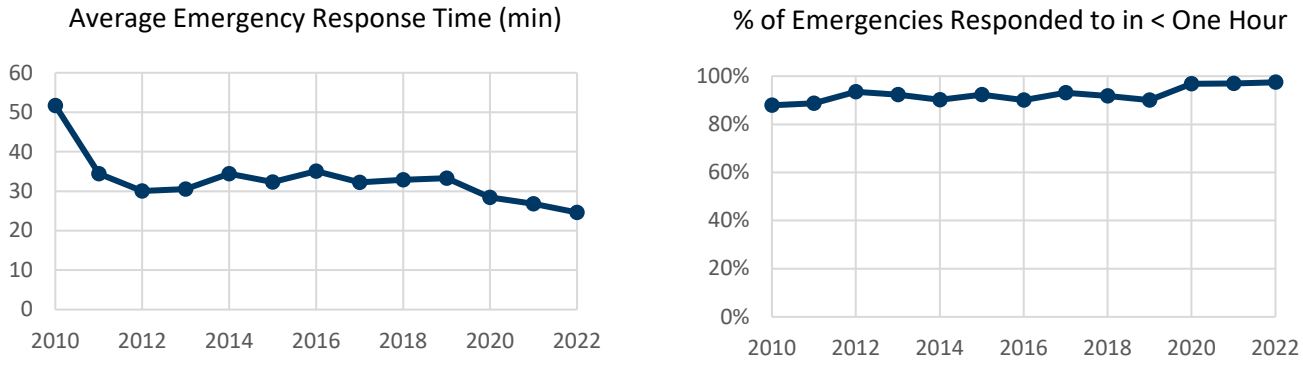
In 2022, Xcel received 13,063 emergency calls that required a response. The Company responded to 97% of emergencies in less than one hour. Additionally, Xcel reported an average response time of 28.09 minutes which was 2% faster than its average response time in 2021.

Staff agrees with the Department that Xcel has fulfilled its gas emergency response reporting requirement.

II. CenterPoint

In figure 22 below, Staff provides a summary of CenterPoint's gas emergency response performance.

Figure 22: Summary of CenterPoint's 2022 Gas Emergency Response Performance



CenterPoint reported all calls received from customers, contractors, passers-by, 911 dispatchers, or company personnel relating to gas odors, gas leaks, indications of high pressure, fires, explosions, and hit gas lines (either inside or outside). In 2022, CenterPoint received 37,332 emergency calls which required a response, compared to 36,001 in 2021.[67] The Company reported taking an average of 24.6 minutes to respond to emergencies in 2022 compared to 26.5 minutes in 2021.

A. Department Comments

The Department noted that CenterPoint has responded to a smaller number of gas emergencies over the last three years. CenterPoint's average response time is down roughly 31% from 2019 and the Company has consistently responded to 97% of emergency calls within one hour. The Department concluded that CenterPoint has met its emergency response time reporting requirements for 2022.

B. Staff Analysis

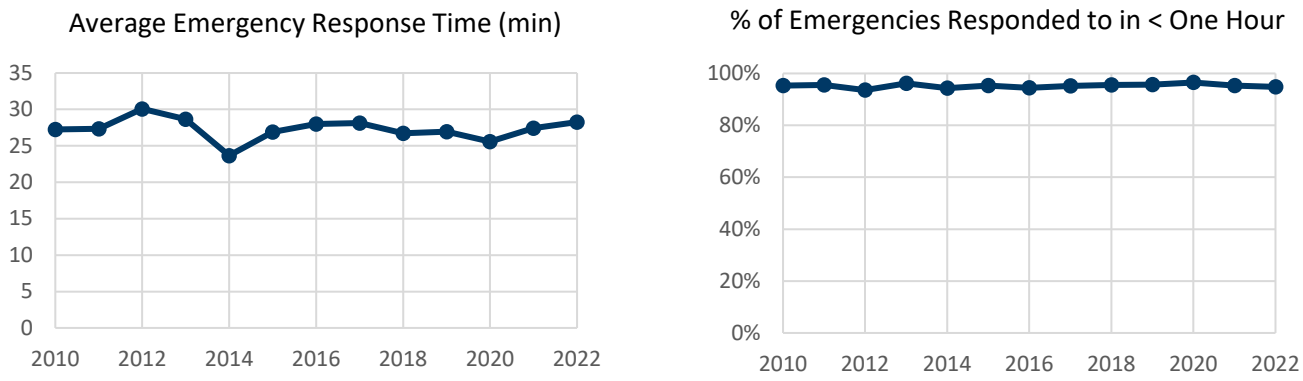
Staff supports the Departments analysis and agrees that CenterPoint has met its gas emergency response time reporting requirements. Staff does not recommend additional action at this time.

[67] Docket No. 23-79, CenterPoint Service Quality Report, p.7.

III. MERC

In figure 23 below, Staff provides a summary of MERC's gas emergency response performance.

Figure 23: Summary of MERC's 2022 Gas Emergency Response Performance



MERC stated that its reported emergency response times include all calls reporting a suspected gas leak, as well as all line hits. The Company's report showed that MERC responded to 5,580 emergency response calls in an average of 28.26 minutes.[68] Ninety-five percent of emergency calls were responded to in less than one hour.

A. Department Comments

The Department stated that MERC has consistently responded to the majority of gas emergencies in less than one hour, and the Company's average response time to emergencies has remained consistent.

B. Staff Analysis

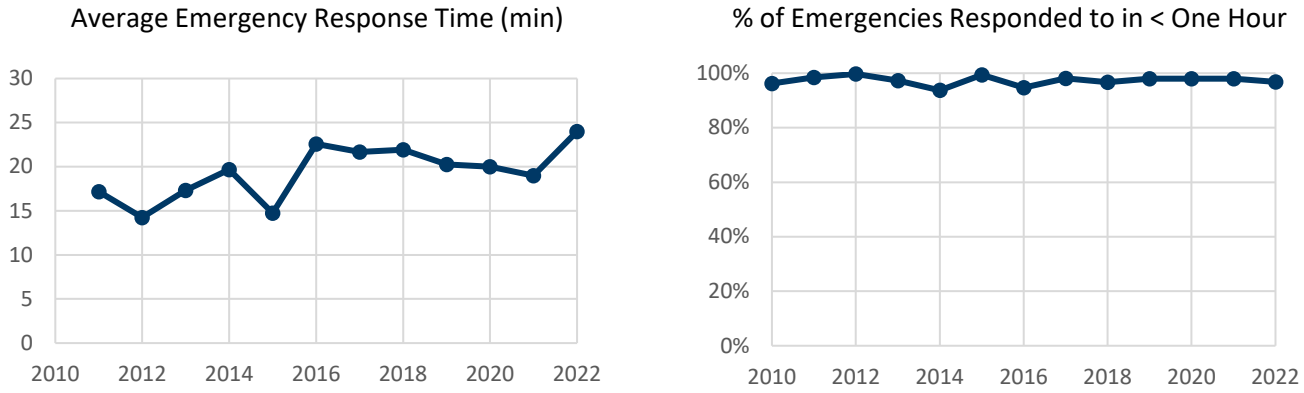
Staff notes that MERC fulfilled its gas emergency response reporting requirements. Staff does not recommend additional action at this time.

IV. Great Plains

In figure 24 below, Staff provides a summary of Great Plains' gas emergency response performance.

[68] Docket No. 23-80, MERC Service Quality Report, Attachment 6.

Figure 24: Summary of Great Plains' 2022 Gas Emergency Response Performance



In 2022 Great Plains received 480 emergency calls and reported an average response time of 24 minutes. In 2022, 97% of Great Plains' emergency calls were responded to in less than one hour.[69] The Company stated that there were 15 calls in 2022 in which the call response time exceeded one hour. Of the occasions in which response crews took more than one hour to respond to an emergency call, one was due to travel distance, thirteen were after-hours calls, and one was because the technician had already been dispatched in response to a different call.

A. Department Comments

The Department issued an information request to Great Plains in which they asked the Company to explain the 5-minute increase in its average emergency response time.[70] In response, Great Plains attributed its increased response time to the instances described in its service quality report in which technicians required more than one hour to respond to an emergency. Great Plains also corrected the response times for two of the 15 instances in which a technician took more than one hour to respond to an emergency call.[71] In these instances, the technician was unable to record the time of their arrival on site, and instead logged their arrival at a later time. These corrections brought the number of emergency calls responded to in over one hour down from 15 to 14 for 2022. These corrections did not impact any other emergency response statistic reported by the Company for 2022. The Department concluded that Great Plains fulfilled its gas emergency response reporting requirements for 2022.

B. Staff Analysis

Staff supports the Department's analysis and does not recommend additional action at this time.

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[69] Docket No. 23-78, Great Plains Service Quality Report, p.4.

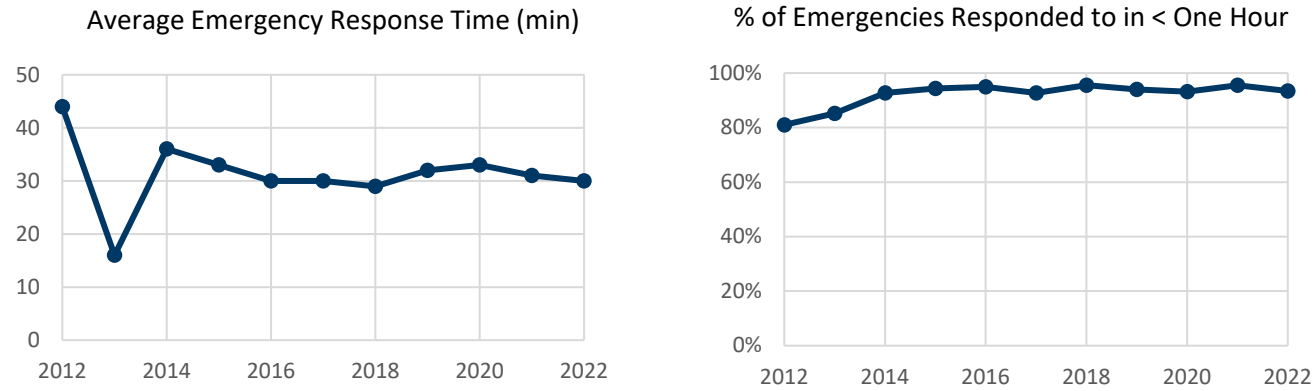
[70] Docket No. 23-78, Department Comments, Attachment 1.

[71] Id.

V. GMG

In figure 25 below, Staff provides a summary of GMG's gas emergency response performance.

Figure 25: Summary of GMG's 2022 Gas Emergency Response Performance



In 99% of 2022 gas emergencies, GMG dispatched a technician within 10 minutes of receiving the emergency call, and in 93% of 2022 gas emergencies GMG had a technician on site within one hour of being dispatched.[72] In 2022, GMG reported an average call to dispatch time of 3 minutes, and an average dispatch to arrival time of 30 minutes.

GMG provided details on both instances where more than 10 minutes were required to dispatch an emergency response crew after receiving an emergency call. Ultimately, both situations were unique in nature, and additional time was required to gather the information necessary to understand the situation before dispatching a response crew.

Regarding the 25 site arrivals that exceeded 60 minutes, GMG explained that 22 instances were unavoidable due to distance and driving conditions; two involved multiple after hour calls where the on call technician prioritized an inside leak before an outside leak; and in the final instance an emergency call was received while multiple technicians had already been dispatched to respond to other emergency calls requiring one of the technicians to complete a repair before responding to the call in question.

A. Department Comments

The Department stated that it had reviewed the instances in which the interval between dispatch and arrival exceeded 60 minutes and concluded that the response times were reasonable given the situations in which they occurred. The Department's expectation is that GMG maintains its emergency response goals and continually work to improve its emergency response where possible in the future.

[72] Docket No. 23-81, GMG Service Quality Report, p.7.

B. Staff Analysis

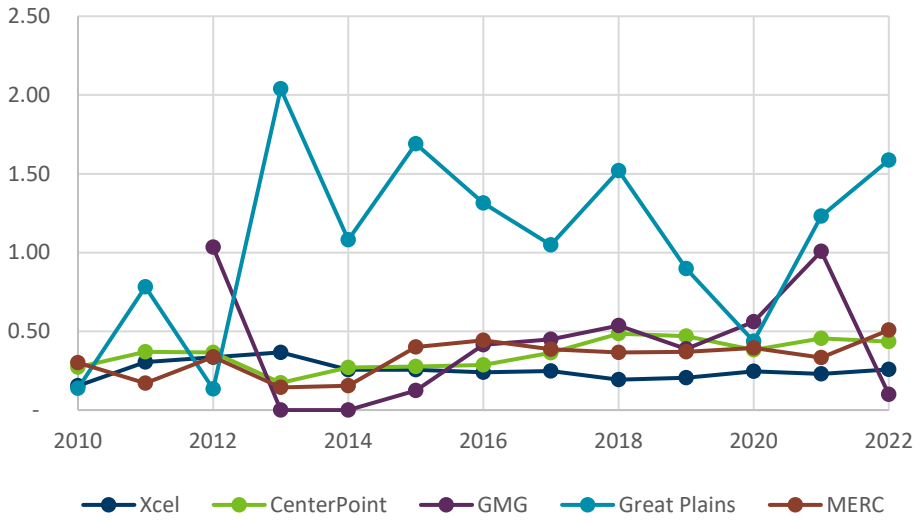
Staff agrees with the Department that GMG's service territory, which includes a wide expanse of rural areas, may make some travel delays unavoidable. Staff supports the Department's analysis and notes that GMG fulfilled its emergency response reporting requirements.

MISLOCATES

The Commission's 09-409 Order requires the Gas Utilities to report the number of times a line is damaged due to a mismarked line or a failure to mark a line.

Staff provides figure 26 below to summarize the Gas Utilities' mislocate performance.

Figure 26: Mislocate Rate per 1,000 tickets



I. Xcel Energy

The Company stated that it defines "mislocate" as a natural gas line that is damaged as a result of mismarking or failure to mark a line. In 2022, Xcel reported 50 mislocates and a mislocate rate of 0.26 mislocates per 1,000 tickets.

A. Department Comments:

The Department noted that the number of mislocates reported by Xcel has not changed significantly and acknowledged Xcel's fulfillment of its mislocate reporting requirements.

B. Staff Analysis

Staff notes that Xcel's 2022 mislocate data is consistent with what the Company's prior service quality reports. In 2022, Xcel reported three more mislocates than in 2021. Staff agrees with the Department that Xcel fulfilled its mislocate reporting requirements and does not recommend action at this time.

II. CenterPoint

In 2022, CenterPoint reported 148 mislocates, 12 fewer than in 2021. The Company recorded a mislocate rate of 0.43 mislocates per 1,000 locate tickets compared to 0.45 in 2021.

A. Department Comments

The Department noted that the total number of locate tickets decreased from 351,659 in 2021 to 340,486 in 2022. According to the Department, the number of mislocates reported by CenterPoint has steadily increased since 2013. However, CenterPoint's mislocate rate dropped in 2022 and is now comparable to the mislocate rates reported by the Company in 2017 and 2018. The Department concluded that CenterPoint has met its mislocate rate reporting requirements for 2022.

B. Staff Analysis

In 2021, both Staff and the Department made note of CenterPoint's mislocate rate, which had been trending upward since 2013. In its 2017 Service Quality Report, CenterPoint discussed its intention to use monthly audit reports produced by each locate group and a weekly report listing all at-fault damages by the locator to better track and address its mislocate issues.[73]

Since peaking in 2018, CenterPoint's mislocate rate has remained relatively stable. In 2022, CenterPoint's mislocate rate was equal to its five-year average, and below a three-year average of 0.44 mislocates per 1,000 locate tickets. Staff agrees with the Department that CenterPoint fulfilled its mislocate reporting requirements.

III. MERC

MERC recorded 54 mislocates in 2022. The Company explained that its percentage of mislocates relative to the number of locate tickets received increased in 2022 compared to 2021. However, the number of mislocates reported relative to the number of locate tickets received continued to remain below 1%. MERC stated that the increase in mislocates could be attributed to staffing challenges with its locating contractor. In response, MERC focused resources on locate requests and engaged another locating company to assist with completing locate request in response.[74]

A. Department Comments

The Department confirmed MERC's analysis, noting that the percentage of mislocates relative to the total number of locate tickets as remained well below 1% for all reporting periods.

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[73] Docket No. 18-312, CenterPoint Service Quality Report, pp.8-9.

[74] Docket No. 23-80, MERC Service Quality Report, p.10

B. Staff Analysis

MERC recorded a record high mislocate rate of 0.51 mislocates per 1,000 locate tickets in 2022. Despite this, the Company's mislocate rate has remained relatively consistent year to year with no obvious upward or downward trend across the past several years. Given that MERC has already taken steps to address its increase in mislocates by engaging another locating contractor to assist with completing locating requests, Staff does not recommend taking any additional action but intends to monitor MERC's 2023 mislocate performance.

IV. Great Plains

Of the 7,562 locate requests Great Plains received in 2022, 12 resulted in mislocates. All 12 mislocates were mismarked lines. Staff notes that Great Plains did not provide a narrative to accompany its mislocate data.

A. Department Comments

The Department noted that Great Plains' mislocates consistently represent less than 1% of the locate tickets the Company receives each year. The Department stated that although the number of mislocates reported by Great Plains has increased between 2020 and 2022, they are still within a normal range for the Company. The Department concluded that Great Plains fulfilled its mislocate reporting requirements for 2022.

B. Staff Analysis

The number of mislocates recorded by Great Plains has ranged from 1 mislocate in 2010 and 2012, and 14 mislocates in 2013 and 2015. Staff notes that there is no meaningful upward or downward trend in the number of mislocates recorded by the Company. It is important to note that the Company's mislocate rate may be influenced by the relatively low number of locate tickets they receive compared to other gas utilities. Staff agrees with the Department that Great Plains met its mislocate reporting requirements and does not recommend additional action at this time.

V. GMG

GMG reported 1 damage incident resulting from a mismarked line in 2022.

A. Department Comments

The Department stated that the number of mislocated went from 12 in 2021 to just 1 in 2022, which is the lowest number of mislocates since 2015. The number of locate requests also decreased by 1,914 between 2021 and 2022. The Department continued to encourage GMG to assess its training program for its locating contractors to ensure its effectiveness to avoid or reduce the potential for mislocate incidents caused by the Company's contractor. The Department noted its intent to continue to monitor this metric in future annual service quality reports.

B. Staff Analysis

In 2021 GMG recorded an all-time high of 12 mislocate damages. The Company explained that this was due to GMG's contractor experiencing substantial turnover in 2020 and 2021. In response, GMG reported working collaboratively with its locating contractor to improve its performance. Additionally, the locating contractor hired an additional two-person crew to improve 2022 performance. These efforts appear to have made an impact on the Company's performance, as only one mislocate was recorded in 2022. Staff notes that GMG fulfilled its mislocate reporting requirements and does not recommend additional action at this time.

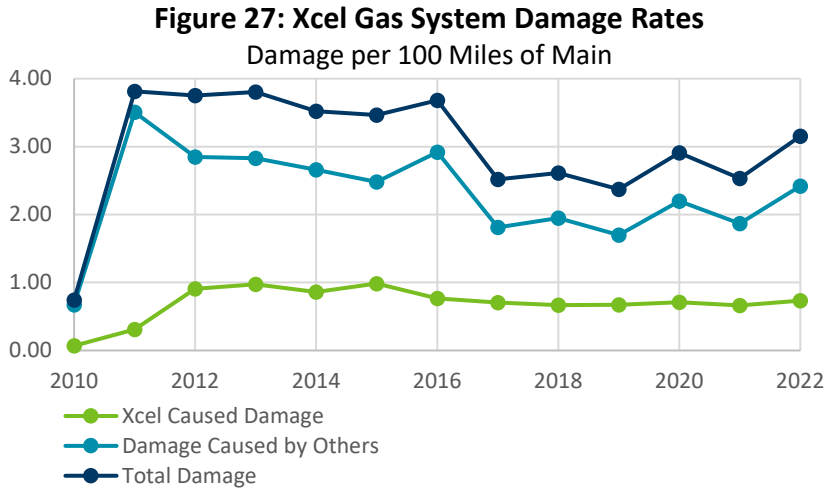
GAS LINE DAMAGES

The Commission's 09-409 Order requires the Gas Utilities to report the number of gas lines damaged each year, categorized according to whether the damage was caused by the utility's employees or contractors or if it was due to an unplanned cause.

I. Xcel Energy

In figure 27 below, Staff provides a summary of Xcel's gas line damage data.

Figure 27: Xcel Gas System Damage Rates



Xcel reported 309 total system damages in 2022.[75] Of the reported system damages 72 were under the control of Xcel or its employees and contractors, and 237 were caused by other sources. The Company's total 2022 damage rate was 3.15 damages per 100 miles of main. Staff notes that Xcel does not provide a discussion to accompany this data.

A. Department Comments

The Department noted that Xcel saw an increased damage rate in 2022 due largely to an increased number of damages caused by others. The Department acknowledged Xcel fulfilled

[75] Docket No. 23-77, Xcel Service Quality Report, Attachment I.

its system damage reporting requirements.

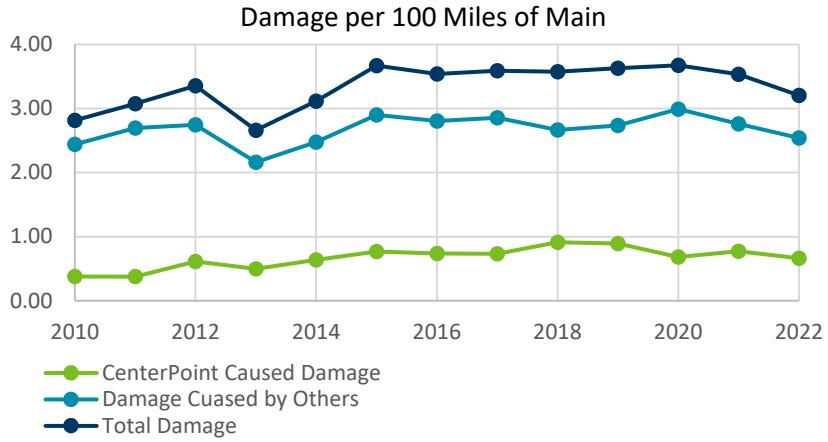
B. Staff Analysis

Staff agrees with the Department that Xcel fulfilled its system damage reporting requirements and does not recommend action at this time.

II. CenterPoint

In figure 28 below, Staff provides a summary of CenterPoint's gas line damage data.

Figure 28: CenterPoint Gas System Damage Rates



CenterPoint reported that between 2021 and 2022, the total number of damages decreased from 935 to 858 and the ratio of damages per 100 miles of pipe decreased from 3.53 to 3.20.[76]

A. Department Comments

The Department stated that, consistent with previous years, factors outside of CenterPoint's control caused a high percentage (79%) of gas line damages in 2022. The Department noted that damage incidents within CenterPoint's control decreased by 13% between 2021 and 2022. The Department concluded that the CenterPoint fulfilled its system damage reporting requirements.

B. Staff Analysis

Damages caused by CenterPoint steadily increased since reporting began but has declined since the start of the COVID-19 pandemic in 2020. While this is a positive development, it is unclear if this trend will continue as the turbulence caused by the pandemic continues to subside. Overall, CenterPoint's damage rate has been trending downward for several years largely due to a decrease in the number of damages caused sources outside of the utility's control. Staff notes that CenterPoint fulfilled its system damage reporting requirements and does not recommend additional action at this time.

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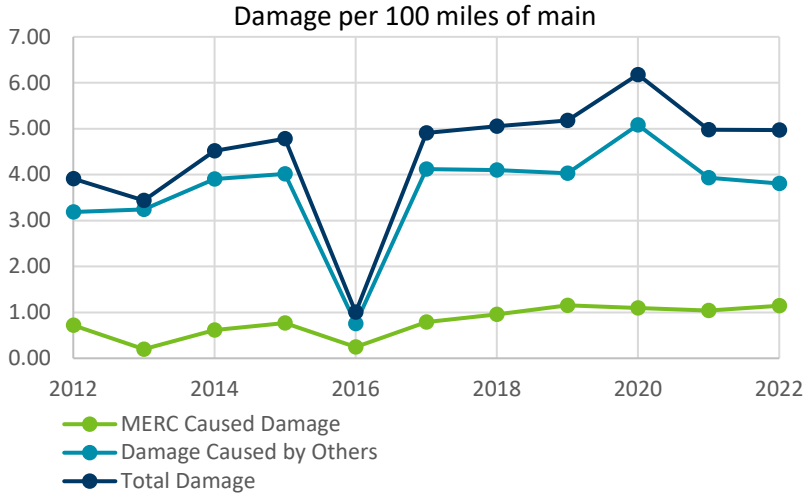
[76] Docket No. 23-79, CenterPoint Service Quality Report, p.6

III. MERC

In figure 29 below, Staff provides a summary of MERC's gas line damage data.

Figure 29: MERC Gas System Damage Rates



MERC reported that the number of gas line damages recorded increased to 265 in 2022 from 263 in 2021. The Company stated that increased construction in recent years has resulted more opportunities for gas line damages and service interruptions. MERC stated that it continues to take steps to mitigate gas line damages as described in the Company's November 2021 reply comments in Docket No. G011/M-21-313:

> "To mitigate service interruptions caused by MERC employees and contractors, MERC investigates and tracks the root cause of each service interruption to analyze and understand the cause of the interruption and measures that could have been taken, and can be taken in the future, to prevent such incidents. MERC has regular meetings with field employees to discuss the root causes of service interruptions and measures that should be taken to help mitigate or avoid such interruptions in the future. Also, in order to mitigate the risk of service interruptions associated with incorrect facility mapping, MERC has proposed to undertake the next phase of its service line mapping project, as described in more detail in Docket No. G011/M-20-405. MERC continues to take affirmative steps to mitigate service interruptions and will continue to take steps toward further mitigating the occurrence of service interruptions."[77]

A. Department Comments

The Department noted that MERC's gas line damages have trended upward over time with MERC reporting the highest number of damaged gas lines in 2020. The Department reviewed the MERC's damage incidents per 1,000 locate tickets and noted that, although the Company's total damages have increased over time, MERC's damages per 1,000 locate tickets has

[77] Docket No. 21-313, MERC Reply Comments, pp. 2-3

remained relatively steady.

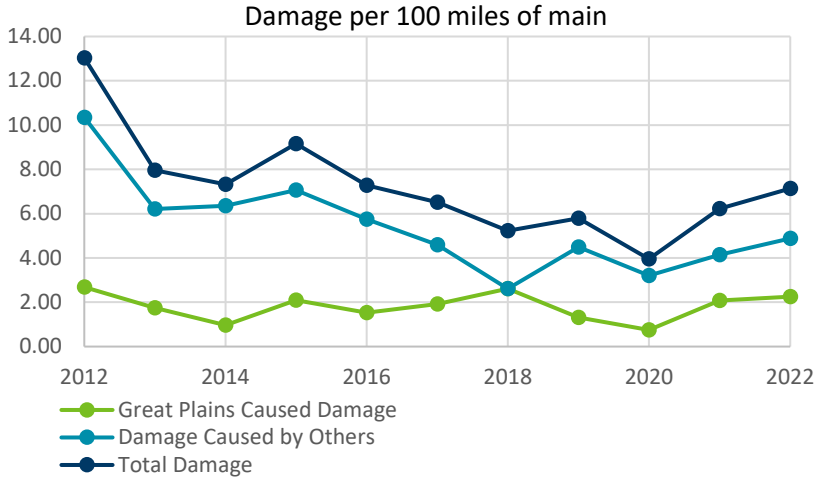
B. Staff Analysis

MERC's damage rate is largely driven by the damages caused by others. The Company's relatively small gas distribution system means that every damage recorded has a larger impact on the overall rate when examining damages per 100 miles of main. All damage related metrics, including damages caused by the company, damages caused by others, total damage incidents, and damages per 100 miles of main decreased in 2021. Staff notes that the Company did not experience a notable increase in the number of damages sustained in 2022 and has already reported taking steps to reduce damage incidents and service interruptions in the face of increased construction activity. Staff intends to continue to monitor the impact of its efforts to reduce future gas line damages but notes that MERC has fulfilled its gas system damage reporting requirements for 2022.

IV. Great Plains

In figure 30 below, Staff provides a summary of Great Plains' gas line damage data.

Figure 30: Great Plains Gas System Damage Rates



Great Plains reported that gas system damages increased from 33 in 2021 to 38 in 2022.[78] Twelve of the 38 damages in 2022 were caused by Great Plains' employees and contractors. The Company explained "the root causes of excavation related damages as reported on the MNOPS Quarterly Utility Damage Survey in 2022 included 4 caused by a notification not being made (no locate ticket), 2 expired notification, 9 filed to determine precise location, 1 failed to maintain marks, 7 caused by failure to maintain clearance, 2 from failure to protect and support during excavation, 1 damaged by hand dig, 7 caused by incorrect records or maps, and 5 caused

[78] Docket No. 23-78, Great Plains Service Quality Report, p.5

by line mis-marked."[79]

A. Department Comments

The Department noted that other than in 2018, factors outside of Great Plains' control caused the majority of gas line damages. The Department concluded that Great Plains fulfilled its gas line damage reporting requirements for 2022.

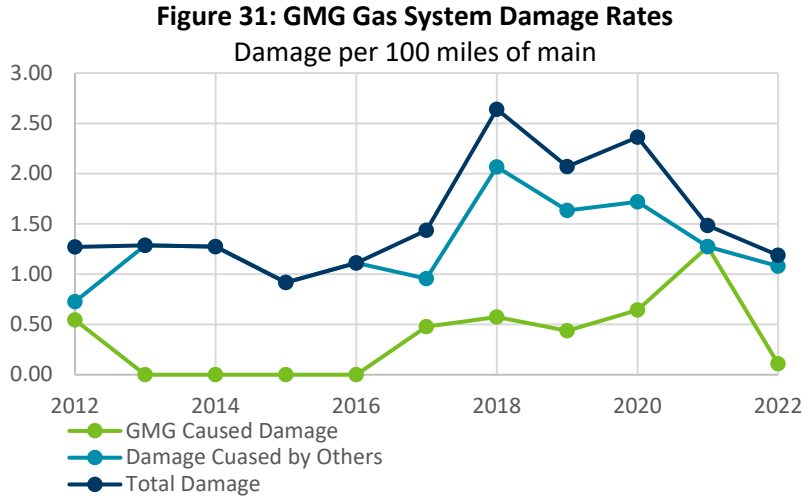
B. Staff Analysis

Great Plains' gas line damage rate decreased steadily from 2012 through 2020 where it reached an all-time low. Since then, the Company has seen its damage rate increase back to 2016 levels. Staff is concerned with the reported increase in gas line damages but notes that the Company's relatively small gas system may result in increased variation with its gas system damage rates. Staff agrees with the Department that Great Plains met the Commission's gas line damage reporting requirements and does not recommend additional action at this time.

V. GMG

In figure 31 below, Staff provides a summary of GMG's gas line damage data.

Figure 31: GMG Gas System Damage Rates



In 2022, GMG reported 11 gas line damage incidents with only one damage having been caused by GMG's employees or contractors. Of the ten damages resulting from unplanned causes, the Company stated that four were from owners or contractors failing to use proper locating practices, and six were the result of improper excavation practices.

A. Department Comments

The Department explained that it had expressed concern in 2021 due to the number of

[79] Id.

preventable damage events reported by GMG. However, the Department highlighted that the damage rate for 2022 was significantly lower than the four years prior. The Department recommended the Commission accept GMG's reporting on damage events for 2022 but noted that it will continue to monitor this metric in the future.

B. Staff Analysis

Staff notes that GMG fulfilled its system damage reporting requirements and does not recommend additional action at this time.

SERVICE INTERRUPTIONS

The Commission's 09-409 Order requires each utility to report the number of service interruptions recorded during the previous year, with each service interruption categorized according to whether it was caused by the utility's employees or contractors, or whether the service interruption was due to any unplanned cause.

Additionally, the Commission's March 6, 2012 Order[80] requires utilities to report additional information on whose service was interrupted, and the average duration of interruptions.

I. Xcel Energy

In table 2 below, Staff provides a summary of Xcel's gas service interruption data.

Table 2: Summary of Xcel 2022 Service Interruptions

Year	Customers Affected	Incidents Caused by Xcel		Incidents Caused by Others	
		# of Incidents	Average Outage Time (min)	# of Incidents	Average Outage Time (min)
2011	2,130	31	339	249	230
2012	473	25	150	254	106
2013	621	26	103	238	120
2014	1,023	18	149	248	142
2015	715	32	115	263	117
2016	606	25	94	252	110
2017	401	19	58	161	99
2018	904	32	28	408	13
2019	4,181	23	92	148	132
2020	3,741	18	131	128	96
2021	489	22	125	59	122
2022	1,307	13	288	5	84

[80] 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

Xcel stated that the number of outages can vary depending on the season, as outages are more likely to occur in the warmer months when there tends to be more construction activity. Additionally, the Company noted that there can be a large range of variability in the number of homes impacted by one incident. According to Xcel, the drivers of this variability include public safety[81], the type of incident, the size of the incident, and system operating pressure.

A. Department Comments

The Department compared Xcel's 2022 service interruption data to a three-year average and noted that the number of incidents and homes affected in 2022 were below the three-year average, but the average duration of outages caused by Xcel was more than double the three-year average of 115 minutes. Despite the increased duration of outages caused by Xcel, the Department acknowledged the factors that impact the duration of an outage. The Department stated its intent to continue to monitor Xcel's service interruption metrics and investigate further should Xcel's outage durations remain elevated. The Department acknowledged Xcel's fulfillment of the Commission's service interruption reporting requirements.

B. Staff Analysis

Xcel continues to report a relatively consistent number of outages caused by its employees and contractors. However, in 2022, Xcel reported the fewest incidents caused by other sources since 2011. Despite this, the total number of homes affected, and the average outage time continue to vary greatly from year to year, seemingly independent of the number of incidents recorded each year. Staff agrees with the Department that Xcel fulfilled its natural gas service interruption reporting requirements and does not recommend action at this time.

II. CenterPoint

In table 3 below, Staff provides a summary of CenterPoint's gas service interruption data.

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[81] Xcel states that public safety is a key factor during emergency situations and decisions to interrupt the gas supply. The Company notes that it will always error on the side of safety when making decisions to interrupt gas in-lieu-of using an alternate method to maintain system pressure.

Table 3: Summary of CenterPoint 2022 Service Interruptions

Year	Customers Affected	Incidents Caused by CenterPoint		Incidents Caused by Others	
		# of Incidents	Average Outage Time (min)	# of Incidents	Average Outage Time (min)
2011	5,317	174	51	459	66
2012	1,554	119	29	570	66
2013	1,073	224	60	317	63
2014	1,181	100	50	538	76
2015	1,745	135	60	618	44
2016	1,430	115	84	646	66
2017	1,406	124	32	486	57
2018	1,545	144	43	468	56
2019	4,356	157	206	461	150
2020	1,895	114	187	541	131
2021	2,417	149	136	520	160
2022	1,437	87	144	453	173

CenterPoint noted in its report that the total number of customers impacted by outages in 2022 decreased from 2021. Staff notes that the Company did not provide a narrative to accompany its data.

A. Department Comments

The Department stated that in 2022, CenterPoint experienced a total of 540 gas service interruptions which affected 1437 customers. CenterPoint saw a 19% reduction in the number of outages reported and a 41% reduction in the number of customers impacted compared to 2021. The Department noted that compared to 2021, service interruptions caused by CenterPoint decreased by 42% and service interruptions outside of the Company's control decreased by 13%. Despite these decreases, the Department explained that the average duration of interruptions experienced by CenterPoint's customers increased by about 10% compared to 2021.[82] The Department concluded that CenterPoint fulfilled its service interruption reporting requirements.

B. Staff Analysis

Staff agrees with the Department's analysis and does not recommend additional action at this time.

[82] Staff notes that the average duration of interruptions displayed in Table 6 differs from what is displayed in the Department's comments. This is due to the Department calculating an average interruption: (total outage minutes / total customers affected).

III. MERC

In table 4 below, Staff provides a summary of MERC's gas service interruption data.

Table 4: Summary of MERC 2022 Service Interruptions

Year	Customers Affected	Incidents Caused by MERC		Incidents Caused by Others	
		# of Incidents	Average Outage Time (min)	# of Incidents	Average Outage Time (min)
2016	225	35	1869	162	156
2017	441	26	139	150	357
2018	1080	26	135	159	164
2019	577	41	114	172	212
2020	517	40	86	212	126
2021	749	40	128	174	106
2022	800	51	161	165	118

MERC reported that the number of service interruptions increased from 214 in 2021 to 216 in 2022. The Company stated that the higher number of service interruptions caused by MERC employees and contractors in 2022 was largely the result of locate staffing issues as described in MERC's narrative for its 2022 mislocate data. MERC reported that these staffing issues resulted in several excavation jobs starting without waiting for line locating to be completed which resulted in increased service interruptions.

A. Department Comments

The Department noted the total number of service interruptions reported by MERC were about the same as 2021.

B. Staff Analysis

The number of outages reported by MERC has increased in recent years, having averaged 191 interruptions across 2017-2019 and 227 interruptions across 2020-2022. MERC reported that increased construction activity and locate staffing issues has resulted in increased system damages and therefore outages. However, MERC has already reported engaging with a second locating company to address locate staffing issues going forward. Staff acknowledges that the Company has taken steps to improve its locate performance which, based on the narrative accompanying MERC's 2022 service interruption data, should reduce the number of service interruptions experienced by the company in 2023. Staff continues to recommend monitoring MERC's damage events, and service interruptions in future service quality reports, noting that the Company has reported taking steps to reduce damage incidents and service interruptions. Staff notes that MERC has fulfilled its service interruption reporting requirements.

IV. Great Plains

In table 5 below, Staff provides a summary of Great Plains' gas service interruption data.

Table 5: Summary of Great Plains 2022 Service Interruptions

Year	Customers Affected	Incidents Caused by Great Plains		Incidents Caused by Others	
		# of Incidents	Average Outage Time (min)	# of Incidents	Average Outage Time (min)
2011	113	22	55	3	166
2012	115	13	244	35	214
2013	221	7	250	22	326
2014	123	3	280	26	336
2015	250	9	276	25	649
2016	213	6	137	32	254
2017	146	10	90	24	188
2018	252	14	85	14	140
2019	355	6	210	12	175
2020	216	3	130	9	157
2021	236	8	188	20	156
2022	127	10	144	25	146

Great Plains reported 35 gas service interruptions in 2022 affecting 127 customers.

A. Department Comments

The Department issued an information request to Great Plains asking the Company to explain the reason for the increased number of service interruptions recorded in 2022.[83] In response, Great Plains stated that the Company saw an increased number of unplanned outages in 2022. These outages were outside of Great Plains control and were located in areas where contractors were excavating around the Company's PVC pipe. Although the Department would have preferred a more detailed explanation regarding the increase in service interrupted, it concluded that Great Plains fulfilled its service interruption reporting requirements for 2022.

B. Staff Analysis

Staff notes that number service interruptions reported by Great Plains in 2022 is in line with what the Company has reported in prior years. In 2022, the company saw an increased number of shorter service interruptions that impacted fewer customers relative to 2021. Staff supports the Department's analysis and does not recommend additional action.

[83] Docket No. 23-78, Department Comments, Attachment 1.

V. GMG

GMG explained that in 2022 they recorded nine service interruptions resulting from line hits. Each service interruption affected a single customer.

A. Department Comments

Staff notes that the Department made no comments in response to GMG's service interruption data.

B. Staff Analysis

GMG's service interruptions decreased from 24 in 2021 to 9 in 2022. Staff notes that GMG fulfilled its service interruption reporting requirements. Staff does not recommend additional action at this time.

MAJOR INCIDENT REPORTING

The Commission's 09-409 Order requires each utility to report major events that are immediately reportable to MNOPS according to the criteria used by MNOPS to identify reportable events. Each summary is to include:

- The location.
- When the incident occurred.
- How many customers were affected.
- How the company was made aware of the incident.
- The root cause of the incident.
- The actions taken to fix the problem.
- What actions were taken to contact customers.
- Any public relations or media issues.
- Whether the customer or the company relighted.
- The longest any customer was without gas service during the incident.

I. Xcel Energy

Xcel reported 18 major incidents in 2022 compared to 19 in 2021. Xcel's customer advocate group receives an internal email notification of major reportable incidents from their operations team and emails the completed forms to CAO and the Department within a reasonably prompt time. Once the incident has been resolved, their operations team notifies their consumer advocate group who emails a summary to CAO and the Department to close the incident communication.

A. Department Comments

The Department noted that Xcel reported 18 major events during 2022, which is a decrease from the three-year average of 26.3 major events. The Department acknowledged Xcel's

fulfillment of its major incident reporting requirements.

B. Staff Analysis

Staff agrees with the Department that Xcel fulfilled its incident reporting requirement and does not recommend action at this time.

II. CenterPoint

In 2022, CenterPoint reported 37 MNOPS reportable outages compared to 63 MNOPS reportable outages in 2021.[84] The Company noted that in some cases it may send a courtesy notification to MNOPS of outage events that do not meet the MNOPS criteria for mandatory reporting and that such events may be included in the 37 outages reported by CenterPoint.

A. Department Comments

The Department highlighted the 41% decrease in CenterPoint's reportable events between 2021 and 2022. The Department explained that the majority of these reportable interruptions were caused by damaged gas mains, damaged gas services, and several fires.

B. Staff Analysis

Staff notes that CenterPoint fulfilled its incident reporting requirement and does not recommend action at this time.

III. MERC

MERC provided information on 12 MNOPS reportable outages in 2022. Staff notes that MERC did not provide any additional information regarding these outages that was not already discussed in the service interruptions section of the Company's service quality report.

A. Department Comments

Staff notes that the Department did not provide comments regarding MERC's MNOPS reportable interruptions but summarized the Company's prior performance in a table.

B. Staff Analysis

The number of MNOPS reportable interruptions decreased from 17 in 2021 to 12 in 2022. Prior to 2020 MERC consistently recorded more than 20 MNOPS reportable interruptions but has since recorded no more than 17 reportable interruptions in a given year. Staff notes that MERC has fulfilled its major incident reporting requirements for 2022.

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[84] Docket No. 23-79, CenterPoint Service Quality Report, pp.7.

IV. Great Plains

Great Plains stated only one service interruption was reported to MNOPS in 2022.[85]

A. Department Comments

The Department noted that Great Plains' MNOPS reportable interruptions had been steadily increasing between 2017 and 2021 before dropping to just one reportable interruption in 2022.

B. Staff Analysis

Staff notes that Great Plains fulfilled its 2022 major incident reporting requirements.

V. GMG

GMG reported that the Company did have any major reportable events in 2022.[86]

A. Department Comment

Staff notes that the Department did not provide any additional comments on this topic outside of what was already reported by GMG.

B. Staff Analysis

Staff notes that GMG had no major reportable events in 2020, 2021, and 2022. GMG has fulfilled its major incident reporting requirements.

CUSTOMER SERVICE O&M EXPENSES

The Commission's 09-409 Order requires each utility to report customer service-related operations and maintenance expenses. The reports are to only include Minnesota-regulated customer-service expenses and be based on the costs each utility records in its FERC accounts 901[87] and 903,[88] plus payroll taxes and benefits.

I. Xcel Energy

Xcel reported that in 2022 its customer service-related O&M expenses totaled $5,837,101 for its Minnesota natural gas utility operations. The company explained that primary drivers for

[85] Docket No. 23-78, Great Plains Service Quality Report, p.5

[86] Docket No. 23-81, GMG Service Quality Report, p.10.

[87] This account includes the cost of labor and expenses incurred in the general direction and supervision of customer accounting and collecting activities.

[88] This account includes the cost of labor, materials used, and expenses incurred in work on customer applications, contracts, orders, credit investigations, billing and accounting, collections and complaints.

increases in customer service O&M expenses include a starting wage increase for hourly employees in customer service-related positions, including call center employees, and the increased use of over-time labor in response to contact center staffing challenges.

A. Department Comments

The Department noted that Xcel's customer service O&M expenses in 2022 were 5% higher than 2021. The Department acknowledged that Xcel fulfilled its O&M expense reporting requirements.

B. Staff Analysis

Staff agrees with the Department that Xcel fulfilled its O&M expense reporting requirements and does not suggest additional action at this time.

II. CenterPoint

In 2022, CenterPoint reported an increase of approximately $2.6 million in customer service-related expenses compared to 2021. The Company noted that this level of customer service-related expenses was still below historic levels due to a change in corporate allocations in 2020 which resulted in benefits and payroll taxes of the Customer Service organization no longer being booked to FERC Accounts 901 or 903.[89]

A. Department Comments

The Department concluded that CenterPoint met its Customer Service O&M Expenses reporting requirement for 2022.

B. Staff Analysis

Staff agrees with the Department that CenterPoint has fulfilled its Customer Service O&M expense reporting requirement and does not recommend additional action at this time.

III. MERC

MERC reported a total of $5,884,151 in customer service-related O&M expenses for 2022, noting that there was a 26% increase in expenses between 2021 and 2022. The Company cited increased contract vendor costs and an increase in staffing levels and associated labor costs as the cause for the reported increase in customer service-related O&M expenses in 2022.

A. Department Comments

Staff notes that the Department did not provide additional comments regarding MERC's customer service-related O&M expenses but did provide a table summarizing MERC's historic

[89] Docket No. 23-79, CenterPoint Service Quality Report, p.7

O&M expense data.

B. Staff Analysis

Staff notes that MERC fulfilled its customer service-related O&M expense reporting requirement. Staff does not recommend additional action at this time.

IV. Great Plains

In 2022, Great Plains reported $563,733 in customer service-related expenses, an 8% increase in compared to 2021.[90]

A. Department Comments

The Department explained that Great Plains' O&M expenses increased dramatically in 2014 and 2015 but have since steadily declined. In 2022, Great Plains' saw its O&M expenses increase by 7% compared to 2021. However, the Department did not see this increase as a cause for concern given current economic conditions. The Department concluded that Great Plains fulfilled its customer service O&M reporting requirements for 2022.

B. Staff Analysis

Staff supports the Department's analysis and does not recommend additional action at this time.

V. GMG

In 2022, GMG's total customer service-related expenses totaled $114,468. The Company noted that its customer service expenses have been relatively consistent over the last several years, taking into account growth and staffing changes.[91]

A. Department Comments

The Department stated that GMG's customer service expenses for 2022 appear reasonable given current growth and staffing changes.

B. Staff Analysis

Staff supports the Department's analysis, and believes GMG fulfilled its customer service expense reporting requirements for 2022. Staff does not recommend additional action at this time.

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[90] Docket No. 23-78, Great Plains Service Quality Report, p.6.

[91] Docket No. 23-81, GMG Service Quality Report, p.11.

INTEGRETY MANAGEMENT PLAN REPORTING

In a January 7, 2020 Order[92], the Commission required CenterPoint to annually file DIMP/TIMP data addressing 29 metrics developed in affiliated interest Docket No. G-008/AI-18-517.[93] In this same order, the Commission required Xcel, MERC, GMG, and Great Plains to file DIMP/TIMP data for the following metrics:

- Leak count by facility type and threat:
  - Total count by cause – above ground
  - Total count by cause – mains
  - Total count by cause – services
- Leak count on main by material
- Leak count on service by material

Additionally, in a November 14, 2019 Order[94] the Commission required the gas utilities to provide their filings under 49 CFR 192.1007 (e)[95] which includes the following information:

(i) Number of hazardous leaks either eliminated or repaired as required by 49 CFR § 192.703(c) of this subchapter (or total number of leaks if all leaks are repaired when found), categorized by cause;
(ii) Number of excavation damages;
(iii) Number of excavation tickets (receipt of information by the underground facility operator from the notification center);
(iv) Total number of leaks either eliminated or repaired, categorized by cause; and
(v) Number of hazardous leaks either eliminated or repaired as required by § 192.703(c) (or total number of leaks if all leaks are repaired when found), categorized by material.

Because utilities already report information on excavation damages and excavation tickets received in response to mislocate reporting requirements, Staff will focus its attention on summarizing utilities' leak data and CenterPoint's DIMP/TIMP reporting requirements.

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[92] 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

[93] CenterPoint, along with the OAG and the Department, reached agreement in a separate affiliated interest agreement docket on reporting metrics for evaluating the cost-effectiveness of safety and reliability infrastructure investments. See *In the Matter of CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas (the Company), for Approval of an Affiliated Interest Agreement between CenterPoint Energy and Minnesota Gas and Minnesota Limited*, Docket No. G-008/AI-18-517, Commission Order (January 14, 2019).

[94] 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.

[95] 49 CFR 192.1007 (e) states that a written integrity management plan must contain "performance measures from an established baseline to evaluate the effectiveness of an integrity management program. An operator must consider the results of its performance monitoring in periodically re-evaluating the threats and risks."

I. Xcel Energy

Xcel provided its leak data in tables 5 and 6 of its 2022 service quality report.[96] Staff notes that Xcel does not provide a narrative to accompany this data.

In 2022, Xcel reported 142 main leaks, 431 service leaks, and 981 above ground leaks. Excavation damages caused 51% of main leaks, and 61% of main leaks occurred on mains made of plastic PE. Excavations were responsible for 55% of service leaks, and 71% of service leaks occurred on services made of plastic PE. Equipment failures were responsible for 67% of above ground leaks.

Regarding hazardous leaks, Xcel reported 115 hazardous main leaks and 486 hazardous service leaks. Excavation damages caused the majority of hazardous main and service leaks, (64% and 49%, respectively). Hazardous leaks most frequently occurred on mains and services made of plastic PE, (80% and 90%, respectively).

A. Department Comments

The Department noted that the percent of hazardous leaks out of total leaks for mains and services (54.5% and 38.0%, respectively), decreased for both mains and services in 2022 compared to their three-year averages. The Department also noted that the percentage of unaccounted for gas decreased from 2.78% in 2021 to 1.99% in 2022.

B. Staff Analysis

Staff notes that Xcel fulfilled its integrity management plan reporting requirements and does not recommend additional action at this time.

II. CenterPoint

CenterPoint reported TIMP/DIMP data addressing the 29 metrics developed in its affiliated interest docket in Schedules 18a through 18m of its report.

A. Department Comments

The Department stated that in 2022, the number of leaks reported by CenterPoint for mains and services were 29% and 10% lower than the reported three-year averages, respectively. The Department noted that the majority of main leaks in 2022 occurred on lines made of plastic-PE, but over the past three years main leaks primarily occurred on coated steel lines. In 2022, service leaks occurred most frequently on plastic-PE lines, which is consistent with the reported three-year averages. Excavation damages were the primary cause of both main and service leaks in 2022.

Regarding above ground leaks, CenterPoint reported 5% more leaks than the Company's three-

[96] Docket No. 23-77, Xcel Service Quality Report, pp.17-19

year average. CenterPoint's above ground leaks were caused primarily by equipment failures.

The Department stated that, as explained in its Comments for CenterPoint's 2019 service quality report, the Company has improved its leak detection equipment which has allowed to identify smaller leaks more cost effectively.

The Department noted that in 2022, most per-unit cost by project increased compared to the 2019-2021 three-year average:[97]

- Transmission Pipe Integrity decreased from $1,223/ft to $909/ft or (26%).
- Transmission Pipeline Replacement increased from $1,436/ ft. to $2,269 per ft or 58%.
- Bare Steel Mains increased from $180/ft to $526/ft or 192%
- Replacement of Copper Service Lines increase from $3,849 per service line to $6,738 per service line or 75%
- Inside Meters decreased from $5,745/meter to $4,454/meter or (22%).
- Vintage Plastic Pipe "dramatically" increased from $4,227 per service line to $9,335 per service line or 121%.

In analyzing CenterPoint's budget variance by project, the Department stated that the variance for 2022 was 11% over budget. According to the Department, the primary drivers behind CenterPoint's 2022 budget variance were the Transmission Pipeline Replacement project and the Bare Steel Main Projects.

When comparing the cost of leak repairs in 2022 to the three-year average, the Department found that the **total cost** of all leak repairs in 2022 was 15% less than the three-year average, and the **average cost** of leak repairs in 2022 was 90% less than the three-year average. The Department also noted that capitalized leak repair costs in 2022 declined by 6% compared to the three-year average, and expensed leak repair costs declined by 16% compared to the three-year average.

CenterPoint also provided information regarding risk levels corresponding to different causes of repairs. When analyzing CenterPoint's 2020 service quality report, the Department requested the Company provide context for this data in its reply comments. CenterPoint responded by stating:

> "For Schedules 18(f) through 18(j), CenterPoint Energy uses a System Threat Risk Model outlined in its DIMP. This model is based on the estimation of the risk associated with each individual leak repair record and summing the risk to account for the risk in the entire system by performing a facility-threat risk analysis. Using the consequence factors identified in the plan (leak class, volume, migration, etc.) and assuming the probability to be one for each leak repair, the risk is determined on each record for the various attributes/conditions. A lower risk factor equates to a safer system. This is a relative risk

[97] Docket No. 23-79, Department Comments, p.22

> model so the results from each year can be compared to each other, however, these factors cannot be compared across utilities as this risk model was developed in house and not used across the industry. Additionally, if this calculation was adopted by other utilities it does take into account population of assets and therefore larger utilities would be seen as inherently riskier."[98]

Staff notes that the Department provided five tables outlining CenterPoint's calculated relative risk for various facility types and materials. Staff has provided a summary of major differences between the 2022 reported risk values and the three-year averages below, noting that a negative percent difference equates to a safer system in 2022 compared to the past three years:

<u>Relative Risk for Above Ground Facilities:</u>

- Corrosion: 62%
- Equipment: 69%
- Excavation: -78%
- Incorrect Operation: 41%
- Natural Forces: -55%
- Other: 39%
- Other Outside Force Damage: -30%
- Pipe, Weld or Joint Failure: -88%
- **Total: 41%**

<u>Relative Risk for Mains:</u>

- Corrosion: -39.6%
- Incorrect Operation: -66.3%
- Natural Forces: 38.5%
- Other: -75.2%
- Pipe, Weld, or Joint Failure: 96.2%
- Other Outside Force Damage: -29.4%
- **Total: -9.3%**

<u>Relative Risk for Services:</u>

- Corrosion: 17%
- Equipment: 12%
- Incorrect Operation: -29%
- Other: -70%
- **Total: 4%**

<u>Relative Risk for Mains by Material:</u>

- Bare Steel: -63.7%

[98] Docket No. 21-303, CenterPoint Reply Comments, pp.1-2.

- Not Assigned/Unknown: -44.3%
- **Total: -9.3%**

Relative Risk for Services by Material:

- Bare Steel: 16%
- Coated Steel: 25%
- Copper: 19%
- **Total: 4%**

The Department concluded that CenterPoint complied with the Commission's Integrity Management Plan and TIMP/DIMP reporting requirements.

B. Staff Analysis

Staff supports the Department's analysis and agrees that the TIMP and DIMP information provided by CenterPoint fulfills the Commission's TIMP/DIMP reporting requirements. Staff does not recommend additional action at this time.

III. MERC

In 2022, MERC reported 77 main leaks, 1158 service leaks, and 923 above ground leaks. Excavation damages caused 48% of main leaks, and 60% of main leaks occurred on mains made of plastic PE. Equipment failures were the primary cause (44%) of service leaks, and service leaks most commonly occurred on "gasket material." Equipment failures were also responsible a majority (53%) of above ground leaks.

Regarding hazardous leaks, MERC reported 6 hazardous main leaks and 13 hazardous service leaks in 2022. Excavation damages were the primary cause of hazardous main and service leaks, (100% and 46%, respectively). Hazardous leaks most frequently occurred on mains and services made of plastic PE, (83% and 39%, respectively).

In addition to tracking data regarding excavations and leaks, MERC stated that it has identified additional measures to evaluate the effectiveness of its integrity management plan as a result of risk evaluation and analysis.[99] The Company noted that the purpose of these performance measures is to allow gas system operators to evaluate the effectiveness of their integrity management programs relative to an established baseline to determine progress and identify the need for any accelerated action.[100] The Company noted:

> "While these performance metrics guide MERC's ongoing evaluation of system integrity and risk, a deeper evaluation of the underlying data is necessary and important to

[99] Additional measures include external corrosion on all steel, atmospheric corrosion on meter sets, emergency response times, and percentage of leaks eliminated or repaired within one year.

[100] Docket No. 23-80, MERC Service Quality Report, pp. 13-14

understanding trends in increasing or diminishing effectiveness. MERC's integrity management risk analysis is an ongoing process of understanding what factors affect the risk posed by threats to the gas distribution system and which risks are relatively more important than others."[101]

A. Department Comments

The Department noted that the number hazardous leaks reported by MERC for both mains and services were lower than the past three years.

B. Staff Analysis

Staff notes that MERC fulfilled its integrity management plan reporting requirements for 2022. Staff does not recommend additional action at this time.

IV. Great Plains

Great Plains stated that total leaks decreased from 164 in 2021 to 101 in 2022. Of the 101 leaks recorded, 22 were main leaks, 27 were service leaks, and 52 were above ground leaks. In 2022, mains made of PVC and services made of plastic were responsible for 59% and 48% of recorded leaks, respectively. Excavations caused 81% and 70% of main and service leaks, respectively. Equipment failures caused 94% of Great Plains' 2022 above ground leaks.

In response to a Commission Staff information request,[102] Great Plains also provided information on its 2022 hazardous leaks. The Company reported 5 hazardous above ground leaks, 16 hazardous main leaks, and 19 hazardous service leaks in 2022. All hazardous main leaks, and 95% of hazardous service leaks were caused by excavation. Other outside forces caused two hazardous above ground leaks, and equipment failures caused three. The majority of hazardous leaks for mains and service occurred on plastic or PVC pipes.

A. Department Comments

The Department stated that equipment failures have been the primary cause of above ground leaks. However, above ground leaks caused by equipment failures have decreased from 110 in 2021 to 49 in 2022.

B. Staff Analysis

Staff notes that Great Plains fulfilled its integrity management plan reporting requirements.

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[101] Id., p.14

[102] Docket No. 23-78, Great Plains' 11/17/2023 response to Commission Staff's Information Request.

V. GMG

In 2022, GMG reported 3 main leaks, 96 service leaks. All 3 main leaks were hazardous main leaks, and 8 of the 96 service leaks were considered hazardous. 100% of hazardous main and service leaks were caused by excavation damages and other outside forces.

The most common cause of main leaks were excavations, representing 100% of the reported main leaks in 2022. Equipment failure was the leading cause of service leaks in 2022, having caused 91% of recorded service leaks. GMG noted that all recorded leaks occurred on plastic pipe.

Of the leaks reported, 78 were above ground leaks, all of which were on service lines. The Company noted that all but one above ground leak was caused by equipment failure. GMG elaborated on the cause of above ground leaks:

> "Specifically, they were due to leaking or venting regulators or meters, over 90% of which were regulators. Since 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 than to repair them. When a component is replaced, it becomes reportable on the PHMSA report; hence, the large number of equipment failure leaks reported."[103]

A. Department Comments

The Department stated that it will continue to monitor GMG's system leak data in future annual service quality reports and will provide any additional discussion and conclusions, if necessary, once sufficient data are available.

B. Staff Analysis

Staff notes that GMG fulfilled its integrity management plan reporting requirements and does not recommend additional action at this time.

EXCESS FLOW VALVES AND MANUAL SHUTOFF VALVE INSTALLATION

The Commission developed two reporting requirements related to EFVs and manual service line shutoff valves. First, in its Order Dated November 14, 2019,[104] the Commission required utilities obligated to report EFV metrics (which includes all gas utilities aside from GMG), to provide recommendations for uniform reporting of annual and overall EFV and manual shutoff valve installation on their distribution system, and to report these metrics in future gas service quality reports.

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[103] Docket No. 23-81, GMG Service Quality Report, p.11

[104] 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.

Second, in a February 23, 2021, Order in Docket No. G999/CI-18-41, the Commission authorized utilities to submit remaining reports required by a July 31, 2019, Commission Order in the same docket in their annual service quality reports starting in 2021. These reports detail utility progress toward holding face-to-face meetings with the decision makers of specified customers[105] regarding the installation of EFVs and manual service line shut off valves in eligible buildings within the utility's service territory. These reports are required through the 2025 reporting period.[106]

I. Xcel Energy

Xcel noted that in the Company's March 30, 2020, compliance filing, they fully complied with Order Paragraphs 7a-7c of the Commission's February 23, 2021, Order. The Commission accepted the company's compliance with these ordering points in its February 23, 2021, Order in Docket No. G999/CI-18-41.

In 2022 Xcel reported that 40.7% of suitable customers had an EFV, and 0.62%[107] of suitable customers had a manual shut-off valve. No customers requested the installation of either an EFV or a manual shut-off valve in 2022.

Xcel noted that it does not have a program in place to install EFVs or manual shut-off valves on a standalone basis but continues to install EFVs and manual shut-off valves as new, eligible service lines are installed, existing service lines are repaired or replaced, or a customer requests installation.

A. Department Comments

The Department stated that the percentage of suitable customers with EFVs has increased from 38.16% in 2019 to 40.73% in 2022, but the 2022 manual shut-off valve figures remained consistent with 2021 values. Given the Company's current approach to installing EFVs and manual shut-off valves, the Department believes that these figures will continue to slowly increase over time. The Department concluded that Xcel fulfilled its EFV and manual shut-off valve reporting requirements.

B. Staff Analysis

Staff notes that according to Xcel's Annual Gas Distribution Report,[108] 4198 EFVs and 132

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[105] The specified customers include k-12 public districts with school buildings in the utility's service territory; K-12 non-public schools with school buildings in the utility's service territory; public and private universities and colleges; hospitals; and multi-unit residential and nursing facilities.

[106] See Order Point 4 of the Commission's July 31, 2019, Order in Docket No. G-999/CI-81-41

[107] Xcel provided an amended Table 8 in response to a Department information request. The amended table includes accurate totals for manual shut-off valve and can be found in Attachment 6 of the Department's September 8, 2023, reply comments in Docket No. 23-77.

[108] See Attachment N of Xcel's 2022 Gas Service Quality Report.

manual shut-off valves were installed in Xcel's service territory in 2022 compared to 4046 and 66 in 2021, respectively. Staff agrees with the Department that Xcel fulfilled its EFV and Manual shut-off valve reporting requirements and does not recommend additional action at this time.

II. CenterPoint

CenterPoint described its outreach efforts to customers regarding EFVs in accordance with the Commission's February 23, 2021 Order, noting that most customers the Company was required to reach out to have an assigned key account manager ("KAM"), but daycares are not assigned KAMs. CenterPoint estimated that it could meet with customers that have a KAM over the course of four years, but for daycares, CenterPoint planned to hire a third-party contractor to meet with those customer and complete meetings over the course of two years.

Due to COVID, CenterPoint has completed all initial contacts by email, and follow-up meetings and engineering studies were completed over the phone. The Company reported that no requests for EFV installations have been made at this time. Five daycare customers did contact the third-party contractor requesting cost information, and one of these customers did request an EFV installation which occurred on June 29, 2020.

In 2022, CenterPoint reported that 44% of suitable customers had an EFV, and 1.12% of suitable customers had a manual shut-off valve. One customer was reported to have requested the installation of an EFV in 2022, and no customers were reported to have requested the installation of a manual shut-off valve.

A. Department Comments

The Department noted that CenterPoint installed 17,424 EFVs and 696 manual shutoff valves in 2022. The Department concluded that CenterPoint has met its EFV and manual shut-off valve reporting requirements.

B. Staff Analysis

Staff notes that CenterPoint's initial filing reported a dramatic decrease in the number of customers suitable for manual shut-off valves between 2021 and 2022. Specifically, the number of customers suitable for manual shutoff valves decreased from 269,400 in 2021 to 53,708 in 2022. Staff reached out to CenterPoint for an explanation and the Company explained that this was the result of a reporting error.[109] The number of customers suitable for a manual shut-off valve in 2022 should instead be 259,190. Staff agrees with the Department that CenterPoint has met its EFV and manual shut-off valve reporting requirements for 2022.

III. MERC

MERC reported that 30.4% of suitable customers have an EFV installed, and that 7.7% of

[109] Docket No. 23-79, Ex Parte Communication.

suitable customers have a manual shut-off valve installed. According to MERC, no customers requested the installation of an EFV or a manual shut-off valve in 2022.

Regarding its EFV customer outreach, MERC provided a summary of its work so far. MERC noted that the Company did not complete any additional outreach aside from continued conversations with schools who had expressed an interest in obtaining additional information or having an EFV installed. MERC stated that the remaining category of multi-family residential and nursing facilities represent the most difficult group to identify a point of contact for outreach due to the fact that each customer is listed individually by meter and the buildings are not classified as a multiunit residential facility within MERC's customer information system.

In describing its outreach efforts, MERC stated:

> "Based on MERC's initial customer outreach, 26 customers have indicated an interest in possibly having an EFV installed on their natural gas service line. Of those, six customers have executed a letter of intent and 20 have indicated an interest in obtaining additional information from MERC regarding the exact location of the work to be performed and outage timelines to complete the work."[110]

The Company noted that it did not incur any incremental costs for customer outreach efforts in 2021 and 2022. MERC stated that it will track its actual costs for recovery in a future GUIC rider or general rate case filing.

A. Department Comments

Staff notes that the Department did not provide additional comments regarding MERC's EFV and manual shut-off valve metrics but did provide a table summarizing MERC's historic EFV and manual shut-off valve data.

B. Staff Analysis

Staff notes that MERC has fulfilled its EFV reporting requirements for 2022.

IV. Great Plains

Great Plains reported that they had identified a total of 330 customers in the categories listed by the Commission's August 20, 2018, Order Paragraph 7a. Great Plains stated that it continues to post information regarding EFVs on their website and provides customers with additional information about EFVs through a bill insert. The bill insert will again be included in customers' bills in June 2023.

Great Plains stated that it will continue to review ongoing projects and how those projects

[110] Docket No. 23-80, MERC Service Quality Report, p. 20

match up with interest by identified customers. The Company explained that it will also continue to provide customers with information regarding its planning and replacement projects so that Customers are aware of the cost saving options available to them.

According to Great Plains, the incremental cost related to face-to-face meetings with the identified categories has been minimal. At this time, Great Plains does not anticipate significant costs for the communication plan in the future.

According to Schedule 14 of Great Plains' 2022 service quality report, 37% of EFV-eligible customers have an EFV installed, and 70% of customers eligible for manual shut-off valves have one installed.

A. Department Comments

The Department concluded that Great Plains met its excess flow valve reporting requirements for 2022.

B. Staff Analysis

Staff agrees with the Department that Great Plains has fulfilled its EFV and manual shut-off valve reporting requirements. Staff does not recommend additional action at this time.

V. GMG

As GMG explained in prior dockets, the Company has completed all its compliance tasks related to the excess flow valve matter addressed in Docket No. G-999/CI-18-41 prior to March 31, 2020. As such, GMG had no further excess flow valve status update to report.

A. Department Comments

The Department stated that it has no issue regarding the EFV and manual shut-off valve installation information reported in GMG's service quality report.

B. Staff Analysis

Although GMG is not required by the Commission to report annual data on EFV and manual shut-off valve installations, Staff notes that the Company does provide some information on EFV and manual shut-off valves through Attachment B of their report. According to Attachment B, GMG reported that 333 EFVs were installed in 2022 compared to 487 in 2021. An estimated 6,254 services were equipped with an EFV at the end of 2022 compared to 5921 services in 2021. Four manual shut-off valves were installed in 2022 and a total of 43 services in GMG's territory were equipped with manual shut-off valves by the end of 2022. Staff does not recommend additional action at this time but notes that GMG fulfilled its EFV reporting requirements for 2022.

MNOPS EMERGENCY RESPONSE VIOLATIONS AND VIOLATION LETTERS RECEIVED FROM MNOPS

In its January 7, 2020, Order in Docket No. G-011/M-19-303, the Commission required MERC to include a summary of any emergency response violations cited by MNOPS along with a description of the violation and remediation in each circumstance. Additionally, in the same Order, the Commission requires MERC to report on the number of violation letters received by the utility from MNOPS during the year in question.

Staff notes that in response to the 2017 service quality reports[111], the Commission required the other Gas Utilities to provide this same information, but only in their 2018 service quality reports. Despite this, each utility continues to report on this information.

I. Xcel Energy

Xcel noted that it did not receive any emergency response violations cited by MNOPS in 2022.[112] The Company received 5 violation letters in 2022 compared to 26 violation letters in 2021. Xcel stated that violation letters are typically triggered by a MNOPS inspection, damage that occurred in the field, or a complaint from an excavator. Upon receipt of a MNOPS violation letter, the Company is given a set amount of time (determined by MNOPS) to provide a response outlining the remediation plan or other steps taken to remediate the violation.

A. Department Comments

Staff notes that the Department summarized Xcel's filing and provided no further comment on Xcel's MNOPS violation reporting requirements.

B. Staff Analysis

Staff notes that Xcel fulfilled its MNOPS violation reporting requirements and does not recommend additional action at this time.

II. CenterPoint

CenterPoint reported receiving 37 emergency response violations in 2022, as well as 26 violation letters.

A. Department Comments

The Department stated that CenterPoint's 37 emergency response violations were a significant

[111] See April 12, 2019, Order in Dockets G-002/M-18-316, G-008/M-18-312, G-004/M-18-286, and G-022/M-18-314.

[112] Docket 23-77, Xcel Service Quality Report, p. 19.

decrease from the 63 emergency response violations they were cited for in 2021. The Department noted that CenterPoint received two fewer violation letters in 2022 compared to 2021. The Department concluded that CenterPoint fulfilled its MNOPS violation reporting requirements.

B. Staff Analysis

Staff supports the Department's analysis and agrees that CenterPoint has met its violation reporting requirements. Staff does not recommend additional action at this time.

III. MERC

MERC reported that the Company was not cited by MNOPS for any emergency response violations in 2022.[113] The Company received 18 violation letters in 2022.

A. Department Comments

The Department noted that the number of violation letters MERC received in 2022 is slightly up compared to 2021, but roughly equal to what was reported in 2020.

B. Staff Analysis

Staff notes that MERC fulfilled its MNOPS violation reporting requirements. Staff does not recommend additional action at this time.

IV. Great Plains

Great Plains was not cited by MNOPS for emergency response violations in 2022 and received no violation letters.

A. Department Comments

Staff notes that the Department did not provide any additional comments on this issue.

B. Staff Analysis

Great Plains fulfilled its MNOPS violation reporting requirements for 2022. Staff does not recommend additional action at this time.

V. GMG

GMG reported that it was not cited by MNOPS for any emergency response violations in 2022 and did not receive any violation letters.

[113] Docket No. 23-80, MERC Service Quality Report, p.12.

A. Department Comments

Staff notes that the Department did not comment on GMG's emergency response violations, or the number of violation letters GMG received in 2022.

B. Staff Analysis

GMG fulfilled its MNOPS violation reporting requirements. Staff does not recommend additional action.

XCEL-SPECIFIC REPORTING REQUIREMENTS

I. Meter Equipment Malfunctions

Xcel is required by a November 30, 2010, Order in Docket No. G002/CI/08-871 to report meter equipment malfunction investigation and remediation information for its gas and electric operations.

Table 6: 2022 Xcel Meter Equipment Malfunction Data

Year	# of Orders for Gas Meter Equipment Malfunctions	Average Days to Resolve	# of Exclusions for Meter Access Issues
2012	2,891	2.97	365
2013	3,286	3.07	608
2014	3,376	3.43	613
2015	2,956	2.94	533
2016	3,966	3.36	399
2017	3,638	3.67	466
2018	3,670	4.05	515
2019	3,626	5.03	619
2020	3,755	4.9	831
2021	3,900	5.44	286
2022	4,679	8.44	321

Xcel explained that the Company performed within the field response parameters prescribed in its tariff. The Company continued to experience gas meter supply chain concerns in 2022, noting that most newly manufactured gas meters set in NSP's Minnesota Service territory have a proprietary communications module attached to them that is compatible with Xcel's contractually operated automated meter reading system. Xcel stated that global supply chain issues has delayed the availability of these modules for final gas meter assembly.

In response to these issues, Xcel stated that they are working to update their automated gas meter reading solution to a Company-owned/operated model. The Company noted that it expects this situation to improve over time with this change.

A. Department Comments

The Department acknowledged Xcel's fulfillment of its meter equipment malfunction reporting requirements.

B. Staff Analysis

In 2021, Staff noted concern about the steady increase in the average number of days required to resolve gas meter equipment malfunctions since reporting began in 2012. Considering Xcel has already acted in response to supply chain constraints, Staff recommends continuing to monitor Xcel's Meter Equipment Malfunction data in future service quality reports.

CENTERPOINT-SPECIFIC REPORTING REQUIREMENTS

I. Steel Service Line and Meter Relocation Expenses

In its March 15, 2010, Order in Docket No. G008/M-09-1190, the Commission required CenterPoint to submit information on the costs associated with steel service line relocation and the relocation of meters operating at 630 cubic feet per hour (CFH) or greater.

Table 7: Steel Service Line Relocation Expenses

Year	# of Jobs	High Cost	Low Cost	Average Cost
2019	28	$ 30,312	$ 1,069	$ 4,714
2020	29	$ 45,953	$ 319	$ 9,348
2021	25	$ 44,731	$ 1,004	$ 10,366
2022	27	$ 90,267	$ 1,229	$ 9,320

Table 8: Meters at 630 CFH or Greater Relocation Expenses

Year	# of Jobs	High Cost	Low Cost	Average Cost
2019	22	$ 40,090	$ 596	$ 6,983
2020	40	$ 13,443	$ 302	$ 3,172
2021	25	$ 28,880	$ 1,205	$ 9,246
2022	23	$ 23,188	$ 236	$ 4,962

The Company stated that for both steel service line relocations and the relocation of meters at 630 CFH or greater, the variability in costs is largely due to the unique circumstances of each job.[114]

A. Department Comments

The Department noted that CenterPoint's steel service line relocation expenses are highly

[114] Docket No. 23-79, CenterPoint Service Quality Report, p.8

variable. As an example, Department noted that the average cost associated with steel service line relocation in 2021 was $10,366 while in 2022 the average cost was $9,320. However, the Department made note of the Company's explanation for this variability, and ultimately concluded that CenterPoint had met the Commission's steel service line relocation expense reporting requirements.

B. Staff Analysis

Staff supports the Department's analysis and does not recommend additional action.

II. Additional Call Center Detail

The Commission's June 8, 2005, Order in Docket No. G008/GR-04-901 requires CenterPoint to provide call center related information and complaints from other state agencies and the Better Business Bureau.

CenterPoint reported that call center volume increased from 1.46 million in 2021 to 1.76 million in 2022.[115] The Company noted that call center volumes for 2021 and 2022 were below historical levels due to COVID-19, and customers not calling to respond to disconnection notices because of the suspension of disconnections during COVID-19.

CenterPoint received 269 complaints from other state agencies and the Better Business Bureau in 2022, all of which were resolved.

A. Department Comments

The Department assumed the COVID-19 pandemic and associated disconnection moratorium was at least partially responsible for the increase in billing calls and payment arrangements to the Company. Staff notes that the Department did not comment on the complaints CenterPoint received from other state agencies and the Better Business Bureau.

B. Staff Analysis

Staff notes that CenterPoint fulfilled its 2022 call center reporting requirements.

III. Employees and FTEs

Order Point 6 of the Commission's March 1, 2021, Order in Docket No. G-008/GR-19-524 requires CenterPoint to provide a five-year historical look at the number of Company employees and designated FTEs performing direct customer service, maintenance, and installations in Minnesota along with their location by region in Minnesota. The Company was also ordered to provide a narrative explaining any historical trends and plans for these employees.

[115] Id.

CenterPoint provided the required information in Schedule 19 of its service quality report and noted that the total number of direct personnel performing customer service increased over 2021, and the number of full-time equivalent employees performing maintenance and installations decreased.

In a supplemental filing filed on July 25, 2022, CenterPoint provided the required information and noted that the number of direct personnel performing customer service declined after 2019. This reduction was reportedly due to the pandemic and the associated decrease in calls related to disconnections. CenterPoint has experienced a steady increase in full time equivalent employees related to the increased capital expenditures the company has experienced in recent years.

Table 9: CenterPoint FTEs Performing Customer Service, Maintenance, and Installations

Year	FTEs Performing Direct Customer Service	FTEs Performing Maintenance and Installations
2017	89	662
2018	96	623
2019	92	631
2020	66	653
2021	71	669
2022	97	655

A. Department Comments

Staff notes that the Department did not comment on the FTE information provided by CenterPoint in its 2022 service quality report.

B. Staff Analysis

Staff notes that this is the second time CenterPoint has provided information on FTEs performing customer service, maintenance, and installations in response to the Commission's March 1, 2021, Order. Order Point 6 of the Commission's March 1, 2021, Order reads:

> In its next Service Quality Report, CenterPoint Energy shall provide a five-year historical look at the number of Company employees and the designated full-time equivalents performing direct customer service, maintenance, and installations in Minnesota along with their location by region in Minnesota. CenterPoint Energy shall provide a narrative explaining any historical trends and plans for these Minnesota employees in light of recent Parent Company plans and recommendations.

It is Staff's understanding that the Commission's March 1, 2021, Order does not require CenterPoint to provide information on FTEs performing customer service, maintenance, and installations on an ongoing basis. Therefore, should the Commission be satisfied with CenterPoint's response here and in its supplemental filing in Docket No. G-008/M-22-213, Staff

would recommend clarifying that the Company no longer needs to provide this information in future service quality reports. Because of the specificity of the language used in its March 1, 2021 Order, Staff does not believe an additional Decision Option in necessary to make this clarification. Staff notes that CenterPoint fulfilled the reporting requirements outlined in Order Point 6 of the Commission's March 1st, 2021, Order.

DECISION OPTIONS

1. Accept the Gas Utilities' 2022 gas service quality reports. (DOC)

2. Require Xcel to ensure that the data reported in its attachment outlining Meter Reading metrics (Attachment B in the 2022 report) reflects all corrections for erroneous duplicate reporting, consistent with the Commission's Orders in Docket No. E,G002/M-13-371 and G002/M-22-210. (DOC, Xcel not opposed)

3. Require Xcel to include annual totals for the data reported under the following reporting categories in all future service quality reports: (DOC, Xcel not opposed)

i) Meter Reading Data – meters read by utility personnel and by customers.
ii) Involuntary service disconnection data.
iii) Call center complaint data.
iv) Gas emergency response time detail data.

OR

4. Require all gas utilities that provide service quality data in monthly intervals, such as monthly totals or monthly averages, to also include an annual value, such as an annual total or an annual average. (Staff Proposed Decision Option)

5. Require Gas Utilities to work with CAO to ensure that Gas Utilities' reporting of complaints forwarded by CAO matches CAO's records going forward. (Staff Proposed Decision Option)