

September 18, 2015

Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, Minnesota 55101-2147

RE: **Compliance Filing – Service Quality Data for Partial Year 2015**  
Docket No. G001/M-14-374  
Docket No. G011/M-15-410

Dear Mr. Wolf:

On March 16, 2015, the Public Utilities Commission (Commission) issued its Order in Docket No. G001/M-14-374 (14-374 Order) accepting the Company's Report and ordering the following:

[Interstate Power and Light] IPL shall file an informational report containing its 2015 service quality data as a compliance filing in this docket by the earlier of (i) 90 days after closing the transaction to sell its gas assets to Minnesota Energy Resources Corporation (MERC) or (ii) May 1, 2016. The informational report will include all information routinely reported as part of the annual gas service quality reports and shall cover the period from January 1, 2015 through the close of the transaction to sell the IPL gas assets.

On July 29, 2015, IPL submitted its 2015 partial-year informational report, in compliance with the Commission's 14-374 Order.<sup>1</sup> The Department thanks IPL for the timely submission of this data.

The Department discussed with MERC the possibility of incorporating IPL's partial-year 2015 data into MERC's next service quality report.<sup>2</sup> Since IPL reported their service quality data on a combined gas and electric basis, it is not as simple as adding the two companies' data together. As an alternative, MERC preliminarily agreed to provide a narrative in its May 1, 2016 report relating to the merger with IPL and the effect on service quality.

The Department recommends that, to the extent a reporting metric pertains to IPL's former gas customers or operations only (*i.e.*, service extension requests, mislocates, damaged gas

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<sup>1</sup> IPL proposed to sell its natural gas distribution system and assets to Minnesota Energy Resources Corporation (MERC) in Docket No. G001,G011/PA-14-107. The Commission approved the sale in its December 8, 2014 *Order Approving Sale Subject to Conditions*. IPL and MERC closed the sale on April 30, 2015.

<sup>2</sup> September 3, 2015 phone call.

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lines, service interruptions, Minnesota Office of Pipeline Safety summaries, emergency response time) that MERC incorporate IPL's partial-year 2015 data into MERC's next service quality report. For those metrics reflecting IPL's combined natural gas and electric customers/operations (call center response time, meter reading performance, involuntary service disconnections, customer deposits, customer complaints, emergency line response time, operations and maintenance expense), the Department recommends that the Commission accept MERC's proposal to provide a narrative of the merger's effect on service quality.

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

Sincerely,

/s/ ANGELA BYRNE  
Financial Analyst  
651-539-1820

AB/lt

## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce  
Letter**

**Docket No. G001/M-14-374 and G011/M-15-410**

**Dated this 18<sup>th</sup> day of September 2015**

**/s/Sharon Ferguson**

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