

Minnesota Public Utilities Commission
Staff Briefing Papers

Meeting Date: **April 1, 2014***Agenda Item #6

Companies: Interstate Power and Light (IPL)

Docket No. G001/M-12-411

In the Matter of Interstate Power and Light Company's 2011 Annual Gas Service Quality Report

Issues: Should the Commission Accept Company's Annual Gas Service Quality Report?

Staff: Marc Fournier651-201-2214

Relevant Documents

Commission Order Setting Reporting Requirements
G-999/CI-09-409..... August 26, 2010

Commission Order Setting Further Requirements
G-002/M-11-360..... March 6, 2012

Interstate Power and Light Company's
Annual Service Quality Report. May 1, 2012

Comments of the Minnesota Department of Commerce
Division of Energy Resources. July 27, 2012

Reply Comments of Interstate Power and Light Company. August 16, 2012

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Statement of the Issues

Should the Commission accept the Company's Annual Gas Service Quality Report for 2011?

Background

On April 16, 2009, the Minnesota Public Utilities Commission (Commission) opened an investigation into natural gas service quality standards and requested comments from the interested parties in Docket No. G999/CI-09-409. On August 26, 2010, the Commission issued an Order Setting Reporting Requirements in Docket G-999/CI-09-409 (09-409 Order). This Order prescribed a list of indicators for which data for each calendar year are to be provided by each utility in a miscellaneous tariff filing to be made by the following May 1.

Interstate Power and Light Company (Xcel or the Company) was allowed to report commingled gas and electric statistics for mislocates, meter reads, and answer times for its utility call centers. For the first year, the Company was allowed to report only as much data as possible from 2010 for service extension response times. For events reportable to the Minnesota Office of Pipeline Safety (MOPS), all utilities were ordered to notify the Commission and the DOC simultaneous with their notice to MOPS.

In addition to the requirements in the 09-409 Order, the Commission's March 6, 2012 Order (11-360 Order) in Docket No. G-002/M-11-360, et. al directed all regulated Minnesota gas utilities to:

- In future annual reports, include data on average speed of answering calls, in addition to reporting on the percentage of calls answered within 20 seconds or less;
- Explain in their 2011 annual reports, whether the difference between the total percentage of meters (100%) and the percentage of meters read (by both the utility and customers) is equal to the percentage of estimated meter reads;
- Explain, beginning with their 2011 annual reports, the types of extension requests (such as requests for reconnection after disconnection for non-payment) they are including in their data on service extension request response times for both locations not previously served, as well as for locations that were not previously served;
- Explain, beginning with their 2011 annual reports, the types of deposits (such as new deposits from new and reconnecting customers and the total number of deposits currently held) included in the report number of "required customer deposits"; and
- Describe, beginning with their 2011 annual reports, the types of gas emergency calls included in their gas emergency response times, as well as the types of emergency calls included in their reports to the Minnesota Office of Pipeline Safety (MOPS). Provide an explanation of any difference between the reports provided to the Commission and to MOPS.

In the 11-360 Order, the Commission also specifically directed Interstate to:

- Beginning in its 2011 annual report, provide the number of miles of pipe it operates in Minnesota;
- Explain how it calculates its 2011 “percentage of calls answered within 20 seconds;”
- Beginning in its 2011 annual report, provide the number of locate requests; and
- Beginning in its 2011 annual report, report all gas service interruptions on its system (not only those service interruptions immediately reportable to the Minnesota Office of Pipeline Safety).

On May 1, 2012, the Company filed its calendar year 2011 Annual Gas Service Quality Report (Report).

Interstate Power and Light Company’s (IPL) 2011 Gas Service Annual Report

Standard: Each utility is required to report call center response time in terms of the percentage of calls answered within 20 seconds.

1. Call Center Response Time/Average Speed of Answer & Percentage of Calls Answered Within 20 Seconds or Less

Each utility is required to report call center response time in terms of the percentage of calls answered within 20 seconds.

IPL: The required information was provided in Attachment A of the Company’s 2011 Report.

DOC: For 2011, the Company reported that it met the annual standard of answering 80 percent of call center calls in 20 seconds or less. The average over 12 months was 85.4 percent, while the monthly percentages ranged from a low of 78.9 percent in July to a high of 92.4 percent in February 2011.

Per the 11-360 Order, Interstate clarified that it calculated its annualized performance of 85.4 percent using the entire year’s data, rather than a simple average of each month’s average results. The Company stated that this methodology provides a truer representation of the annual performance. Also in compliance with this order, Interstate reported that its average speed of answer was 19.5 seconds.

The DOC acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-361 Orders.

2. Meter Reading Performance

Standard: Each utility shall report the meter reading performance data contained in Minn. Rules, part 7826.1400. The reporting metrics include a detailed report on meter-reading performance for each customer class and for each calendar month:

- 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 estimated;
- The number and percentage of customer meters that have not been read by utility personnel for periods of 6 to 12 months and for periods 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.

IPL: IPL met the meter reading performance requirements under Minnesota Rules, part 7826.0900 in all months except July 2011.

Due to an unexpected number of sick and vacation days taken by its meter reading staff, IPL's meter reading performance dropped to just slightly below 90% during the month of July 2011. Additional data relating to IPL's meter reading performance may be found in Appendix A at the end of this report. Data reported contains both gas and electric information. In the tabular data, the difference between the total percentage of meters and the percentage of meters read (by IPL and customers) is equal to the percentage of estimated meter reads.

DOC: Interstate reported that an annual average of 94.5 percent of customer meters were read by utility personnel and 0.03 percent were ready by the customer in 2011. In each month, at least 89 percent of the Company's Minnesota meters were read. Per the 11-361 Order, Interstate explained that the difference between the total percentage of meters read (by IPL and customers) and 100 percent is equal to the percentage of estimated meter reads.

Interstate provided the number of meters unread for 6 to 12 months and for more than 12 months for its Residential, Commercial, Industrial, and Rural customer classes. The Company stated that meters that were not read for more than 12 months were a result of the meter being inaccessible to its meter reading staff. When a meter has not been read for four months or more, Interstate will attempt to contact the customer by phone, letter, email, and door hanger notifications in an effort to arrange a meter reading appointment with the customer.

The DOC acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-360 Orders.

3. Involuntary Service Disconnection

Standard: In lieu of reporting data on involuntary service disconnections as contained in Minn. Rules, part 7826.1500, each utility shall reference the data that it submits under Minn. Stat. §216B.091 and 216B.096.

IPL: A copy of the monthly Cold Weather Rule reports is included on pages 5 through 40 of Appendix A at the end of the Company's report.

DOC: The DOC acknowledges that Interstate has fulfilled the requirements of the 09-409 Order.

4. Service Extension Request Response Time

Standard: Each utility shall report the service extension request response time data contained in Minn. Rules, part 7826.1600, items A and B., except that data reported under Minn. Stat. 216B.091 and 216B.096, subd.11, is not required.

- a) The number of customers requesting service to a location not previously served by the utility and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service; and
- b) The number of customers requesting service to a location previously served by the utility, but not served at the time of the request, and the interval between the date service was installed and the date the premises were ready for service.

IPL: IPL received requests for gas service at new locations during all months except January, February, and March. For commercial customers, the time between notification of readiness and the actual installation date was two days. For residential customers, the time span was slightly greater than four days. For locations not previously served, the data measures the time for new service to be initiated at the new location. For locations that were previously served, the data covers all requests for initiation of service, including reconnects for credit/non-payment issues. IPL's data collection methodology does not differentiate between the types of requests at these previously served locations. Specific monthly details on IPL's service extension response times may be found in Appendix A, page 41 of the Company's 2011 report.

DOC: Interstate further explained that it received requests for gas service at new locations during each month in 2011 except for January, February, and March.

For locations previously served, Interstate does not differentiate between the types of requests, therefore reported data covers all requests for initiation of service including reconnects for credit/nonpayment issues. The Company stated that it does not track response time by account for previously served locations, however requests are typically handled the next business day. For

locations not previously served, the average response time to commercial requests was two days, while the average response time to residential requests was 4.1 days. These averages are generally timely and fairly consistent with last year's averages.

The DOC acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-360 Orders.

5. Customer Deposits

Standard: Each utility shall report the customer deposit data contained in Minn. Rules, part 7826.1900.

IPL: On average, 34 customers per month were required to provide a deposit prior to initiating service. The monthly average number of customers required to make a deposit for 2009 and 2010 were 28 and 38, respectively. The types of deposits included in the data are for new and reconnecting customers. As of December 31, 2011, IPL held 934 deposits for Minnesota gas and electric customers with a total value of \$207,524. Additional customer deposit data may be found in Appendix A, page 42 at the end of this report. The information provided contains both gas and electric data.

DOC: The reporting metric for customer deposits is the number of customers required to make a deposit as a condition of receiving service. Interstate reported a total of 405 such accounts for both its natural gas and electric operations in 2011.

Per the 11-360 Order, the utilities were required to explain the types of deposits included in the reported number of "required customer deposits." Interstate stated that its data included deposits for new and reconnecting Minnesota customers. The Company also reported that as of December 31, 2011 it held 934 deposits for a total of \$207,524.

The DOC acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-360 Orders.

6. Customer Complaints

Standard: Each utility shall report the customer complaint data contained in Minn. Rules, part 7826.2000.

IPL: During 2011, IPL averaged 30 customer complaints per month, with the top five categories being General Billing, Meter Reading, Property Damage, Turn-on, and Credit/Collections. These five categories account for approximately 60% of the customer complaints received during the year. The monthly average number of customer complaints received by IPL for 2009 and 2010 were 67 and 48, respectively. Detailed customer complaint is located in Appendix A, pages 43-52 of the Company's annual Gas Service Quality Report. The information provided contains

both gas and electric data.

DOC: Interstate reported that it received 354 electric and natural gas complaints in 2011, four of which were forwarded to the Consumer Affairs Office. Data provided by the Company showed that 21.2 percent of complaints were resolved upon initial inquiry. The most frequent complaint category was “General Billing.” Interstate reported that 59.3 percent of these complaints were resolved by taking the action the customer requested. These statistics represent an improvement in total complaints reported, but a decline in complaints resolved upon initial inquiry (21 percent) compared to 2010 (34 percent) and 2009 (41percent).

The DOC also notes that 46, or 13 percent, of complaints received in 2011 were related to Property Damage. Thirty-nine of the complaints were reported between March and August. The DOC requests that Interstate provide a full discussion in Reply Comments regarding the circumstances surrounding these property damage claims and whether anything could, or is being done to prevent recurrence in the future.

The DOC also requests that Interstate provide, on a going-forward basis, “Total” columns, in addition to “Monthly Average” columns, for its complaint information in its Appendix A to increase the usability of the data.

The DOC acknowledges that Interstate has fulfilled the requirements of the 09-409 Order.

IPL Reply: A review of the data revealed that all 2011 property damage complaints, not just those received between March and August 2011, can be attributed to electric activities.

Additionally, the DOC requests IPL to provide, on a going-forward basis, “Total” columns in addition to “Monthly Average” columns, for its complaint information in IPL’s Appendix A.

IPL agrees with the DOC’s recommendation and will provide this information in its future natural gas service quality reports.

7. Gas Emergency Calls

Standard: Each utility shall report the data on telephone answering times to its gas emergency phone line calls.

IPL: For 2011, IPL fielded 2,546 emergency calls, with an average answer time of 31 seconds. This call volume includes both gas and electric callers who responded “Yes” to the initial interactive voice response question, “Is this a life threatening emergency, such as a downed wire or gas odor?” The average times for emergency call answer time statistics were negatively influenced by the call volume from July 2011, when severe storms swept through IPL’s service territory, greatly impacting IPL’s electric system. This highly concentrated influx of

emergency/outage calls impacted the results for not only the primary emergency answer process, but the direct emergency phone line as well. Detailed call answer time data were provided in Appendix A, page 52.

IPL also provides a direct phone number to emergency responders, fire, and law enforcement personnel that places them at the top of the queue when calling to report an emergency situation. The average answer time for the 3 calls to this direct emergency line was 144 seconds during 2011. This result is greatly skewed by one of the three calls, which had a 391 second queue time. This long queue time was the result of the very high call volume in July.

DOC: In 2011, Interstate fielded a total of 2,546 emergency phone calls during the year with three calls to the Company's direct emergency line. The average response time for all emergency calls was approximately 31 seconds, and the average response time for the direct emergency line was 144 seconds.

In its report, Interstate explained that the average response time was negatively influence by the call volume from July 2011, when severe storms swept through IPL's service territory, greatly impacting IPL's electric system. IPL also stated that the direct emergency line average was greatly skewed by a queue time of 391 seconds for one call caused by the high call volume in July.

The Commission did not specify a metric for the natural gas utilities regarding acceptable average response time to emergency calls in its 09-409 Order. However, the DOC would expect the Company's average answer time for emergency calls to be approximately 20 seconds, since the Company is required under Minn. Rules, part 7826.1200 to answer 80 percent of all calls within 20 seconds as an electric utility.

Interstate reported an average answer time of 19.5 seconds for all call center calls in 2011. As such, the DOC is concerned that the Company was unable to reach this threshold for its emergency calls. Even after excluding July's call volume and queue time from the annual calculation, Interstate's average answer time is 27 seconds. Specifically, the months of March through September had average answer times ranging from 28 seconds in May to 52 seconds in September. The DOC recommends that the Company fully explain, in Reply Comments, the circumstances surrounding the emergency call wait times during March through September 2011 (excluding July as previously discussed). In addition, the queue time of 391 seconds for the one direct emergency line call in July is particularly alarming. This is a wait time of over six and a half minutes when a customer is calling regarding "a life threatening emergency, such as a downed wire or gas odor." Interstate stated that this queue time was a result of the high call volume experienced after storms swept through in July. The DOC recommends that the Company fully explain, in Reply Comments, what, if anything, is being done to ensure that wait times such as this one do not occur in the future.

The DOC acknowledges that Interstate has fulfilled the requirements of the 09-409 Order.

IPL Reply: IPL notes that during periods of high emergency calls –such as electrical storm events –the incremental call volume does not necessarily produce incremental information on operational

issues that need to be addressed. More likely, multiple customers are calling about the same issues—and often issues that the company is already in the process of addressing. In those circumstances, IPL updates the voice recording so that, prior to answering the customer calls, customers are informed that IPL knows there are electrical outage issues. IPL annually reviews current call – routing plans to ensure the efficacy of routing all call types. IPL’s goal is to manage its Call Center resources to provide the best overall experience for customers, while being mindful of the costs that all customers are asked to share for delivering customer service via the Call Centers. To date, IPL has staffed its call centers to manage all calls to the standards, on average. If IPL were to staff the call center to meet the same standard for emergency calls (as a subset of total calls), then IPL would need to add staff. Those staff would be idle for periods of normal call volume. To date, IPL has not judged this to be the best or most cost-effective overall solution for customers.

IPL reiterated that it is unable to segregate the electric outage calls from gas odor/emergency calls, which is negatively influencing the data for the gas calls. As a point of reference, during 2011 there were 245 gas emergency orders dispatched from IPL’s Distribution Dispatch Center for its Minnesota service territory, which can be used as a conservative approximation of the number of gas emergency calls received. This represents only 9.6 percent of the total emergency calls received. Perhaps more impactful to customer safety is the fact that IPL responded to 100 percent of those 245 gas emergency calls within 60 minutes, with an average response time of 18.8 minutes.

Additionally, the DOC recommends that IPL explain what is being done to ensure that long wait times do not occur on its direct emergency line in the future.

IPL indicated that it takes seriously its responsibility to appropriately manage emergency calls, and will continue to look for cost-effective solutions to provide satisfactory performance. The circumstances of the excessively long wait time reported in July 2011 are documented, and IPL considers it to be an anomaly, having occurred during a significant electric outage event. IPL has reviewed its operating procedures and call queuing protocols, and determined they worked as designed.

Additionally, as a point of clarification, the direct emergency line is not available for customers or the general public, but rather, it is intended for use by emergency response personnel only. The emergency line number addressed here is a legacy number that has not been widely disseminated. The number, which received a total of three (3) calls in 2011, does not utilize any automated call-handling technology to help route calls. IPL does plan to re-route the number into the overall queue to minimize wait times in the future.

8. Gas Emergency Response Times

Standard: Each utility shall report data on gas emergency response times and include the percentage of emergencies responded to within one hour and within more than one hour. CenterPoint, IPL, and MERC shall also report the average number of minutes it takes to respond to an emergency.

IPL: In 2011, IPL responded to 100% of 245 gas emergency calls within 60 minutes, with an average gas emergency response time of 18.8 minutes.

IPL codes the following issues as emergency calls: Carbon Monoxide, Fire, Line Hit, and Odor. Any call that is coded as an emergency will be included in the statistical reports submitted both to the Commission and MNOPS.

DOC: The Company stated that it was able to respond to 100 percent of its 245 emergency calls in less than one hour. In terms of average response time, Interstate was able, on a monthly basis, to respond to emergency calls in less than 23 minutes. On an annual basis, the Company's average response time was 18.8 minutes. The DOC commends Interstate for improving its average response time from last year and encourages the Company to maintain this level of service or better in future years.

In the 11-360 Order, all gas utilities were required to describe the types of gas emergency calls included in their gas emergency response times, as well as the types of emergency calls included in their reports to MOPS. The utilities were also required to provide an explanation of any difference between the reports provided to the Commission and to MOPS. Interstate provided types of calls classified as emergencies and stated that any call that is coded as an emergency will be included in the statistical reports submitted both to the Commission and MOPS.

The DOC acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-360 Orders.

9. Mislocates

Standard: Each utility shall report the data on mislocates, including the number of times a line is damaged due to mismarked or failure to mark a line.

IPL: In 2011, IPL had five gas lines damaged as a result of a mismarked line or failure to mark a line. In 2011, IPL received a total of 15,332 locate requests covering its Minnesota electric and gas service territory.

DOC: Since this is the first year Interstate has provided the number of locate requests, the DOC cannot make definitive conclusions because it is unaware of underlying trends or historical patterns.

The DOC acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-361 Orders.

10. Gas System Damage

Standard: Each utility shall report data on the number of gas lines damaged. The damage shall be categorized according to whether it was caused by the utility's employees or contractors, or whether it was due to any other unplanned cause.

IPL: In 2011, there were seventeen instances where IPL's gas facilities were damaged during excavation activities. Two of those damages were caused by IPL electric employees or contractors working on IPL's behalf installing electric facilities. Of the seventeen damages, ten were attributable to power operated equipment (backhoes, augers, directional drill), four were caused by hand tools, two were caused by stakes driven into the ground, and one was caused by a tree branch that pierced the ground when a tree was felled.

DOC: Interstate reported 17 incidents of gas system damage in 2011, two of which were caused by Interstate electric employees or contractors working on the Company's behalf installing electric facilities. This calculates to a rate of 7.2 incidents per 100 miles of main.

Since this is the first year Interstate has provided the miles main pipe it operates, the DOC cannot make definitive conclusions because it is unaware of underlying trends or historical patterns.

The DOC acknowledges that Interstate has fulfilled the requirements of the 09-409 Order.

11. Gas Service Interruptions

Standard: Each utility shall report data on service interruptions. Each interruption shall be categorized according to whether it was caused by the utility's employees or contractors, or whether it was due to any other unplanned cause.

IPL: In 2011, there were zero service interruptions on IPL's gas system due to system integrity issues. Of the seventeen excavation damages cited in Part J of the Company's Service Quality Report, fifteen resulted in gas outages to at least one customer. Only one of the fifteen outages was attributed to actions of IPL or one of its contractors. Of those fifteen instances, thirteen resulted in an outage to only a single customer, while two resulted in outages to multiple customers. Only two of the outages met the incident reporting criteria for the Minnesota Office of Pipeline Safety (MOPS or MNOPS), as gas service to more than fifty customers was interrupted.

DOC: Interstate reported that there were no service interruptions during the reporting period that were the result of system integrity issues. Interstate further reported that of the 17 damage instances discussed in the DOC comments, 15 resulted in gas outages to at least one customer, and only two events met MOPS reporting criteria.

The DOC acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-361 Orders.

12. MOPS Summaries K

Standard: Each utility shall report summaries of major events that are immediately reportable to the Minnesota Office of Pipeline Safety (MOPS) according to the criteria used by MOPS to identify reportable events. Each utility shall also provide summaries of all service interruptions caused by system integrity pressure issues. Each summary shall include the following ten items:

- 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; and
- the longest any customer was without gas service during the incident.

IPL: The two incidents that met the MNOPS incident reporting threshold in 2011 are described below:

- At 8:23 AM on August 30, 2011, IPL received a call that the 60 psig, 4” polyethylene line feeding Conger, MN had been hit by a contractor installing fiber optics with a track plow attached to a bulldozer. IPL crews were dispatched, and because the affected line was a radial feed, the station feeding the town was shut-down at 8:45 a.m. As a result, 80 customers were out of service. Jim House, IPL Senior Manager of Distribution and Metering contacted MNOPS shortly thereafter and was assigned report number 121560 for this incident. There was no local media involvement. The only active customer contact occurred as IPL employees shut off service riser valves to customers’ premises in preparation for the relight activities. After replacing the damaged section of main, 64 of the 80 customers were relit by IPL personnel before the end of the day. IPL relit the majority of the 16 remaining customers over the next several days when notified by customers that they were available. The last customer was relit on October 26, 2011. The gas line had been located as required, although further investigation indicated that the locate signal had bled off onto a nearby fiber optics line, resulting in a mismark of the gas main.
- At 7:24 a.m. on September 21, 2011, IPL received a call that the 60 psig, 4” polyethylene main near 612 Lincoln Avenue in Albert Lea had been hit with a backhoe by a contractor working on a sewer/water project. Initial IPL responders were onsite at 7:32 a.m. and the line was shut down at approximately 8:30a.m., resulting in an interruption of gas service to 245 customers. Jim House, IPL Senior Manager of Distribution and Metering contacted MNOPS shortly thereafter and was assigned report number 121992 for this incident. Local media involvement consisted of an interview with the local operations manager by a local television crew. The only active customer contact occurred as IPL employees shut of

service riser valves to customers' premises in preparation for the relight activities. After replacing the damaged section of main, 207 of the 245 customers were relit by IPL personnel before the end of the day. IPL relit the majority of the remaining 38 customers over the next several days when notified by customers that they were available. The last active customer was relit on November 3, 2012. There are two additional facilities currently without service, but those premises are vacant and the owner is not interested in relighting them at this time. The hit gas line had been properly located, but the excavator did not maintain the locate marks as required.

DOC: Interstate reported two such major events during 2011. The Company provided summaries for both incidents, which included the required information listed above. The DOC notes that according to Interstate, most customers affected by both interruptions were restored by the end of the same day, but many were restored over the several days following these events. Specifically, 16 of the 80 affected customers from the August 30, 2011 interruption were restored more than a day later, and the last customer was not relit until October 26, or 57 days later. Thirty-eight of the 245 affected customers from the September 21, 2011 interruption were restored more than a day later, and the last active customer was not relit until November 3, or 43 days later. The DOC requests that Interstate provide a detailed discussion regarding the circumstances leading to these extended interruption periods.

The DOC acknowledges that Interstate has fulfilled the requirements of the 09-409 Order.

IPL Reply: In the two line hits discussed, IPL attempted to notify the customers using door hangars and phone calls. The biggest driver for customers requesting re-lights appears to be their desire to use the installed gas utilization equipment, whether it be cooking equipment, clothes dryer, or a furnace/boiler. In some cases, the only installed gas-fired equipment is the furnace, and on those occasions, customers may not call for a relight until the weather begins to turn cold. That was the case for the two premises with extended interruption periods of 43 and 57 days, respectively.

13. Customer Service Related Operations and Maintenance Expenses

Standard: Each utility shall report customer-service related operations and maintenance expenses. The reports shall include only Minnesota-regulated, customer-service expenses based on the costs recorded in FERC accounts 901 and 903 plus payroll taxes and benefits.

IPL: In 2011, customer-service related costs related to FERC accounts 901 and 903 were \$5,501 and \$115,642, respectively. These costs include payroll taxes and benefits.

DOC: The DOC acknowledges that Interstate has fulfilled the requirements of the 09-409 Order.

Staff Analysis

Staff recommends that the Commission accept IPL's filing. It appears that IPL in reply comments addressed all of the issues raised by the DOC. The issues raised by the DOC were clarification of customer complaints, emergency response times, and service interruption periods.

Commission Options

1. Accept IPL's 2011 Gas Service Quality Report.
2. Do not accept IPL's 2011 Gas Service Quality Report.

Recommendation

Staff recommends that the Commission adopt alternative number 1.