

August 25, 2023

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
DocketNo. G022/M-23-81

Dear Mr. Seuffert:

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

*2022 Annual Gas Service Quality Report* (Report) submitted by Greater Minnesota Gas, Inc. (Greater Minnesota or the Company).

Kristine A. Anderson, Corporate Attorney for Great Minnesota Gas, Inc. filed the Report on May 1, 2023

The Department recommends the Minnesota Public Utilities Commission (Commission) accept Greater Minnesota's *2022 Annual Gas Service Quality Report*.

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

Sincerely,

/s/ FELICIA CULLEN  
Public Utilities Financial Analyst

FC/ad  
Attachment



## Before the Minnesota Public Utilities Commission

### Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. G022/M-23-81

#### I. BACKGROUND

On April 16, 2009, the Minnesota Public Utilities Commission (Commission) opened an investigation into natural gas service quality standards and requested comments from the Minnesota Department of Commerce, Division of Energy Resources (Department) and all Minnesota regulated gas utilities in Docket No. G999/CI-09-409 (09-409 Docket). Various rounds of comments and discussion occurred in the 09-409 Docket and the issues came before the Commission on August 5, 2010. During the August 5, 2010 Commission Agenda Meeting, Greater Minnesota Gas, Inc. (Greater Minnesota, GMG, or the Company) argued that, due to its size relative to Minnesota's larger regulated gas utilities, certain reporting requirements should be modified. In its January 18, 2011 *Order—Setting Reporting Requirements* (09-409 Order), the Commission determined Greater Minnesota must provide service quality information in the same manner as other Minnesota gas utilities, except as modified by the Commission's 09-409 Order.

On April 25, 2011, Greater Minnesota filed its calendar year 2010 *Annual Service Quality Report*. In its March 6, 2012 *Order—Accepting Reports and Setting Reporting Requirements* (March 6 Order) in Docket No. G022/M-11-356 *et al.*, the Commission supplemented the reporting requirements set out in its 09-409 Order and directed the Minnesota natural gas utilities to convene a workgroup to improve reporting consistency and address other issues. The workgroup met on June 22, 2012 and developed more uniform reporting requirements; GMG did not attend the workgroup meeting.

Subsequently, the Company has filed the following annual service quality reports:

2012	May 1, 2013	G022/M-13-362
2013	November 13, 2014	G022/M-14-964
2014	May 8, 2015	G022/M-15-434
2015	May 2, 2016 <sup>1</sup>	G022/M-16-383
2016	May 1, 2017	G022/M-17-336
2017	May 1, 2018	G022/M-18-314
2018	May 1, 2019	G022/M-19-304
2019	May 15, 2020 <sup>2</sup>	G022/M-20-459
2020	April 30, 2021	G022/M-21-304
2021	April 21, 2022	G022/M-22-193
2022	May 1, 2023	G022/M-23-81

<sup>1</sup> The Commission's 09-409 Order requires the gas utilities to file its annual report by May 1, however, May 1, 2016 was a Sunday and the Company filed its 2015 annual service quality report on May 2, 2016; as such, Greater Minnesota complied with the 09-409 Order.

<sup>2</sup> The Department notes that Greater Minnesota requested an extension on May 1, 2020 to file its 2019 annual service quality report on May 15, 2020. The Department concludes that the Company filed its 2019 annual service quality report in a timely manner.

The Department reviewed the Company's 2022 Annual Service Quality Report (Report) for compliance with Commission Orders and to identify potential issues. The Department provides its analysis below.

## **II. THE DEPARTMENT'S ANALYSIS**

Per the Commission's 09-409 Order, Greater Minnesota was not required to track information for certain reporting requirements until January 1, 2011. This report marks the 11th time Greater Minnesota has provided information for the following reporting requirements:

- Telephone Response Time
- Meter Reading Performance
- Service Extension Request Time<sup>3</sup>
- Customer Deposits
- Customer Complaints
- Gas Emergency Response Times
- Mislocates
- Information Minnesota Office of Pipeline Safety (MnOPS) damage reports
- Gas Service Interruptions
- Major Reportable Events
- Customer Service Expenditures related to FERC Accounts 901 and 903.

The 2022 Report contains the 12th year of data for the remaining metrics:

- Service Disconnections
- System Damage.

The Department discusses, separately, each reporting requirement below.

### **A. CALL CENTER RESPONSE TIME**

Minnesota Rules, part 7826.1200 requires Minnesota's electric utilities to answer, at least 80 percent of calls made to the utility's business office during regular business hours within 20 seconds. For Greater Minnesota, the Commission's 09-409 Order states the following regarding telephone response time:

GMG shall track and report the total number of phone calls received during each annual reporting period and report on the number of times the phone rings before calls are answered. GMG shall begin tracking this data on January 1, 2011 and begin including data for this requirement in its second annual report.

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<sup>3</sup> In its April 8, 2016 Order in Docket No. G022/M-15-1090, the Commission approved revised Service Extension Request Time reporting requirements beginning with the 2016 annual service quality report.

The Company explained in its filing that all calls are answered live within three rings. However, if the Company does not answer within three rings, the call is automatically forwarded to an after-hours answering service, which GMG stated typically answers within one additional ring. The Company's 2012-2022 historical call volumes are summarized in Table 1 below.

**Table 1: Call Volume Data (2012-2022)**

Year	Number of Calls Received	Percentage Change in Calls <sup>4</sup>
2012	9,107	54.70%
2013	12,876	41.39%
2014	13,399	4.06%
2015	11,308	(15.61)%
2016	10,812	(4.39)%
2017	10,705	(0.99)%
2018	10,981	2.58%
2019	10,927	(0.49)%
2020	11,893	8.84%
2021	12,713	6.89%
2022	12,997	2.23%

In its Report, Greater Minnesota noted that the incoming call rate is comparable to the number of calls received over the last several years. The Company explained the calls are associated with its primary business line and calls received refer to both customer and non-customer related matters. In addition to issues such as payment or service questions, this phone line also takes calls from potential customers, developers, and builders, and receives other inquiries which may not be related to Greater Minnesota's natural gas operations.

Based upon the Company's data, the Department concludes Greater Minnesota likely answered calls promptly during the reporting year.

#### ***B. METER READING PERFORMANCE***

In its 09-409 Order, the Commission required GMG to report meter reading performance data in the same manner as prescribed in Minnesota Rule 7826.1400. The Company provided the meter reading performance data per Minnesota Rules.

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<sup>4</sup> The department calculate the percentage change in calls by using the following formular: (Current year number of calls received – Prior year number of calls received)/Prior year number of calls received.

The Company's meter reading data for 2012-2022 are summarized in Table 2 below.

**Table 2: Meter Reading Data (2012-2022)**

Year	Total Meters Billed	Company Read	% Company Read	Self-Read	% Self-Read	Estimated	% Estimated
2012	54,169	42,733	79.00%	60	0.10%	11,376	21.0%
2013	62,868	56,623	90.00%	336	0.50%	5,909	9.5%
2014	66,284	64,357	97.00%	372	0.50%	1,555	2.5%
2015	80,580	79,570	98.75%	135	0.17%	1,010	1.25%
2016	84,371	83,784	99.30%	133	0.16%	458	0.54%
2017	92,456	92,297	99.83%	23	0.03%	136	0.15%
2018	99,567	99,561	99.99%	0	0.00%	6	<0.001%
2019	106,350	106,350	100.00%	0	0.00%	0	0.00%
2020	113,067	112,954	99.90%	0	0.00%	113	0.10%
2021	120,550	120,546	99.99%	0	0.00%	6	0.004%
2022	122,640	122,638	99.99%	0	0.00%	2	0.002%

As noted in Table 2, the Company had no self-read meters and 0.002% estimated meters during 2022. The estimated meters were due to the failure of automated meter reading equipment to pick up meter reads in one month. Greater Minnesota also reported no unread meters for more than six months in calendar year 2022. Greater Minnesota's meter reading performance in 2022 is driven by its deployment of Advanced Meter Reading (AMR) equipment, which began in late 2014. Based upon the data in Table 2 above, it is clear the deployment of AMR has been successful in terms of reduced estimated meter reads, customer-read meters, and unread meters.

### *C. INVOLUNTARY SERVICE DISCONNECTION*

The Commission's 09-409 Order requires Greater Minnesota to provide involuntary service disconnection data in the same manner that it reports this data under Minnesota Statutes §§ 216B.091 and 216B.096 in Docket No. E,G999/PR-14-02, which relate to the Cold Weather Rule (CWR). Table 3 shows GMG's number of disconnections as reported in its service quality dockets.

**Table 3: Involuntary Disconnections (2012-2022)<sup>5</sup>**

2012	54
2013	63
2014	125
2015	122
2016	69
2017	39
2018	43
2019	16
2020	0
2021	18
2022	66

Involuntary disconnections in 2022, were at their highest since 2016. They decreased to zero instances in 2020 due to COVID-19. In 2021, when GMG returned to normal business operations, they made a total of 18 involuntary service disconnections. The involuntary disconnection rate went from 0.20% of residential customers in 2021, to 0.70% in 2022. However, this number is not out of line with previous years.

As noted above, the involuntary disconnection data are taken from the monthly CWR filings. The Department observed significant inconsistencies and issues (*e.g.*, data issues, late filings) with Greater Minnesota's CWR data in the 2014 annual service quality report; as such, the Department requested the Company improve its reporting of this metric in the future. In light of these concerns, the Department reviewed the Company's monthly and weekly CWR filings.<sup>6</sup> The Department reviewed the CWR data filed in calendar year 2022 and compared it to the information provided by Greater Minnesota in the 2022 *Annual Service Quality Report*. The Department reconciled the information contained in the 2022 Report with the monthly CWR reports. The Department reviewed the monthly CWR reports for 2022 and determined that they were filed in a timely manner.

The Department concludes that Greater Minnesota's involuntary disconnection data for 2022 appear acceptable.

#### **D. SERVICE EXTENSION REQUEST RESPONSE TIME**

The reporting method for service extension request response time has been a topic of great discussion in past Greater Minnesota annual service quality reports. Based on the 09-409 Order, Greater Minnesota is required to report the service extension request response time data contained in Minn. Rules, part 7826.1600, items A and B, except for service connections related to Minn. Stat. §§ 216B.091

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<sup>5</sup> As the Department noted in its July 22, 2015 Comments in the 2014 service quality report, older data may not be comparable to more recent data given the data concerns identified in that docket. These comparability issues still exist, so caution should be used when comparing older involuntary disconnection information with the post-2014 data.

<sup>6</sup> 2021 Cold Weather Rule filings can be found in Docket No. E,G999/PR-22-02.

and 216B.096, subd. 11 (involuntary service disconnections). Minnesota Rules, part 7826.1600, items A and B requires the following:

- 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.
- 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 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.

In the 2013 Annual Service Quality Report, the Department raised concerns regarding the Company's service extension data. Specifically, the Department noted Greater Minnesota did not provide a breakdown of service extension times between existing and new areas as prescribed by Minnesota Rules and Commission Order, and the Department requested that the Company provide this data.<sup>7</sup>

The Company subsequently provided information regarding customer additions along new main installations and additions for customers on existing main that did not previously have natural gas service. In its 2014 Annual Service Quality Report, Greater Minnesota stated it added approximately 550 new meters in 2014 but did not provide a breakdown by new main installations and extensions off existing mains as it had in the 2013 annual service quality proceeding, nor did the Company provide an exact number of total meter additions.

In both the 2013 and 2014 service quality report proceedings, Greater Minnesota expressed concern the service extension reporting requirement may not be the best means of determining whether service is being extended to customers in a timely manner. In its August 31, 2015 Order in Docket No. G022/M-14-964, the Commission allowed Greater Minnesota to propose a new metric for service extension response time and required that the Company file a proposal within 120 days of the date of the Order. On December 31, 2015, Greater Minnesota filed its proposal in Docket No. G022/M-15-1090. Greater Minnesota and the Department exchanged written comments regarding the Company's proposal and the Commission ultimately approved a new service extension reporting requirement in its April 6 Order. The April 6 Order required the Company to begin reporting its new service extension data beginning with the 2016 annual service quality report. As such, this Report marks the fifth time the Company has provided data per the revised service extension reporting requirement.

Per the April 6 Order in Docket No. G022/M-15-1090, Greater Minnesota is required to provide information on extensions to new service areas (i.e. involving new mains and new services), the addition of new customers on existing mains, and a discussion of requests for changes in service to areas already served by the Company (e.g., transfer of ownership of property). In addition to the service extension data, the Commission also required that Greater Minnesota provide copies of advertisements

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<sup>7</sup> See Greater Minnesota 2014 Annual Service Quality Report, Docket No. G022/M-15-434, page 5.

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. The Department reviewed the service extension data provided by Greater Minnesota and it appears to conform to the requirements ordered by the Commission.

The Company explained it did not extend any mains to new service areas in 2022 but, instead, focused on in-fill in its existing service territory and did not undertake major new area projects. As a result, GMG did not undertake any major new area main extension projects during 2022. This marks the fourth year since Greater Minnesota began reporting these data that it did not extend service to a new area.

**Table 4: New Main Extension Projects (2016-2022)**

Year	Estimated Number of Residential Customers Added	Actual Number of Residential Customers Added	Estimated Number of Firm Commercial Customers Added	Actual Number of Firm Commercial Customers Added	Estimated Number of Interruptible Commercial Customers Added	Actual Number of Interruptible Commercial Customers Added
2016	404	374	27	28	3	3
2017	281	278	1	1	0	0
2018	243	314	22	22	4	4
2019	0	0	0	0	0	0
2020	0	0	0	0	0	0
2021	0	0	0	0	0	0
2022	0	0	0	0	0	0

Greater Minnesota also provided monthly data for on-main customer additions; customers who had access to Greater Minnesota service but had not previously requested service. The Department provides a summary of annual service extensions for these customers below.

**Table 5: On-Main Customers Added (2016-2022)**

Year	Residential Service Requests	Average Number of Days to Install	Firm Commercial Service Requests	Average Number of Days to Install	Interruptible Commercial Service Requests	Average Number of Days to Install	Denied Service Requests
2016	276	27	7	23	2	26	0
2017	178	30	24	13	1	8	0
2018	327	27	0	0	1	35	0
2019	448	25	29	12	5	4	0
2020	389	21	61	33	4	36	0
2021	418	19	66	12	1	13	0
2022	374	18	62	17	0	0	0



In 2022, the Company added 436 on-main customers and denied no service requests. This is a decrease of 48 on-main customers added over 2021. Across customer classes, the average time required to extend service was similar to extension times in previous years. On a monthly basis, the service extension times for the Residential rate class remained consistent except in March and August, when average waits were greater than the average 18 days.<sup>8</sup>

The on-main service extension data for 2022 appear acceptable. The Department looks forward to reviewing this data in future reports.

Greater Minnesota stated there were no issues or delays related to the transfer of service between customers (*e.g.*, new ownership of a house). The Company explained that it does not lock or stop service for an ownership transfer unless there is a foreclosure at a previously served location. Given the lack of customer complaints, as discussed in Section II.F below, the Department concludes the Company has reasonably dealt with service requests in 2022.

As noted above, the Commission's Order in Docket No. G022/M-15-1090 required Greater Minnesota to provide copies of all advertisements and solicitations provided to potential new customers in a new geographical area, the date at which deposits were first accepted for a new geographic area, and an explanation of the reasons why customers were denied service when requested. Since the Company did not extend into new geographical areas in 2022, they did not distribute any advertisements or solicitations and therefore, has appended no sample copies. As stated on page 4 of the instant petition, Greater Minnesota did not deny service to any customer requesting service in 2022. The Department concludes the Company complied with the Commission's Order in Docket No. G022/M-15-1090 concerning service extension reporting requirements.

#### *E. CUSTOMER DEPOSITS*

The 2022 Report marks the 12th time the Company has provided data regarding customer deposits; the table below details years 2012-2022.

**Table 6: Customer Deposits (2012-2022)**

Year	Number of New Deposits	Average Monthly Residential Customer Count*
2012	3	4,075
2013	6	4,432
2014	13	4,918
2015	10	5,396
2016	4	6,289
2017	5	6,893
2018	2	7,434
2019	2	7,942
2020	0	8,434
2021	0	8,720
2022	1	9,159

\*Source: Annual Gas Jurisdictional Reports filed each May 1.

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<sup>8</sup> Petition, page 5.

The number of new customer deposits increased steadily for three years beginning in 2012, but has decreased in recent years and remains well below the highest number (13) in 2014. The Company required one customer to make a deposit as a condition of receiving service due to poor payment history. The Company noted it does require deposits of new customers, but may require deposits from existing customers who have had a service disconnected as the result of nonpayment.<sup>9</sup>

*F. CUSTOMER COMPLAINTS*

The Commission's 09-409 Order specified GMG's customer complaint reporting requirements, as follows:

In addition to tracking and reporting on customer complaints received from the Commission's Consumer Affairs Office (CAO), GMG shall begin tracking and reporting the total number of customer complaints received and the number of complaints resolved for each of the following categories: billing errors; inaccurate metering; wrongful disconnection; high bills; inadequate service; service extension intervals and service restoration intervals.

In its Report, GMG explained when a customer calls, it is not necessarily a complaint, and the Company's customer service representatives attempt to identify and answer the caller's question or concern immediately. The Company classifies a call as a complaint only if the customer service representative escalates the matter to a supervisor either because the customer service representative is unable to satisfy the customer's concern, or the customer is requesting that GMG take action.

Greater Minnesota's reported total number of complaints, on an annual basis, is summarized in Table 7 below.

**Table 7: Annual Total Complaints (2012-2022)**

Year	Complaints
2012	6
2013	3
2014	4
2015	4
2016	1
2017	4
2018	1
2019	1
2020	3
2021	0
2022	0

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<sup>9</sup> Petition, page 5.

The Company noted in its Report it did not have any complaints in 2022 that were forwarded by, or that came to it from, either the Office of the Attorney General (OAG) or the Commission's CAO. According to the Company, there were no customer calls which met the level of a complaint in 2022.

After reviewing the Company's explanations, the Department concludes that Greater Minnesota's complaint response was adequate.

**G. GAS EMERGENCY CALLS AND RESPONSE TIME**

In its 09-409 Order, the Commission required Greater Minnesota to track and report the total number of gas emergency calls received during each annual reporting period. The 2022 Report marks the 12th time these data were collected and reported. Greater Minnesota stated that, since the Company does not have a dedicated emergency line, emergency calls are manually tallied and the amount of time it takes to answer each call cannot be tracked. Greater Minnesota's emergency call and response time metrics for years 2012-2022 are reported in Table 8 below.

**Table 8: Gas Emergency Calls and Response Time (2011-2022)**

Year	Number of Emergency Calls	Call to Dispatch (0-10 minutes)	Call to Dispatch (more than 10 minutes)	Average Dispatch Time (minutes)	Dispatch to Arrival (less than 60 minutes)	Dispatch to Arrival (greater than 60 minutes)	Average Dispatch toArrival (minutes)
2012	100	95	5	3	81	19	44
2013	88	75	13	6	75	13	16
2014	110	107	3	3	102	8	36
2015	123	120	3	7	116	7	33
2016	219	214	5	5	208	11	30
2017	220	220	0	3	204	16	30
2018	248	246	2	3	237	11	29
2019	269	269	0	2	253	16	32
2020	249	249	0	3	232	17	33
2021	200	198	2	3	191	9	31
2022	380	378	2	3	355	25	30

The Company explained the two instances where call time to dispatch was greater than ten minutes:

On occasion, a call may be a bit more lengthy than other similar calls in order to obtain complete information about the situation, as long as taking the time to gather the details can be handled safely based on the particular circumstances. With regard to the 13-minute time to dispatch, the

customer was calling from the metropolitan area regarding his northern Minnesota lake home that is served by GMG, but then did not know whether there was an emergency. A lake-home neighbor had called the customer to report an odd smell from his garage, so the customer called GMG. During the conversation, the customer opted to not provide GMG's team with a service address, changing his mind about having GMG respond. Out of an abundance of caution, GMG's team identified the service address based on the customer's name and other details that he provided and dispatched a technician to the address. Ultimately, the issue was not natural gas related; but, the handling of the call and dispatch took a bit longer than usual based on the circumstances. With regard to the 17-minute dispatch, the call came in after hours while the weather was poor and particularly cold over the winter holiday period. GMG's on-call technician was already responding to another emergency, so an alternate technician was dispatched. It took a small amount of additional time prior to dispatch to identify alternate technician availability prior to dispatch.<sup>10</sup>

The Company provided additional information regarding instances in which the call response time interval between dispatch and arrival were greater than 60 minutes. The Department reviewed these explanations and concludes the response times were reasonable. In 21 of the instances which took greater than 60 minutes for arrival, the average delay time was 11.6 minutes and those delays were primarily caused by driving distance and/or road conditions. There were 4 other instances where the delay was more significant: one was an after-hours call which was received at the same time as another more serious call, which the technician prioritized. The Company noted in that instance, the technician communicated with the customer whose call was delayed. There was another, longer delay, with similar circumstances and another, which was due to icy road conditions. The Company analyzed these incidences in greater detail and concluded in each instance the delays were outside the control of the technician and noted Greater Minnesota hires technicians in areas within and near its service territory; however, GMG serves a wide expanse of rural areas and travel delays cannot always be avoided.

Based on the information provided by Greater Minnesota, the Department concludes the Company responded to emergencies in a timely manner. Although the Company had several incidences with lengthy response times, it appears Greater Minnesota responded adequately and, in a manner consistent with information provided in earlier annual service quality reports. The Department expects the Company to maintain its emergency response goals and continually work to improve its emergency response where possible in the future.

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<sup>10</sup> Petition, page 8

*H. MISLOCATES*

The Commission's 09-409 Order requires Greater Minnesota to provide data on mislocates, including the number of times a line is damaged due to a mismarked line or failure to mark a line. Greater Minnesota's mislocate data are summarized in Table 9 below.

**Table 9: Mislocates (2012-2022)**

Year	Mislocates	Number of Locate Requests
2012	6	5,807
2013	0	6,853
2014	0	7,445
2015	1	8,033
2016	4	9,632
2017	4	8,895
2018	5	9,312
2019	4	10,310
2020	6	10,686
2021	12	11,902
2022	1	9,988

As noted above, the number of mislocates doubled from six to 12 in 2021 relative to 2020, and the number of locate requests increased by 1,216. In 2022, the number of mislocates went from 12 to 1, which is the lowest number since 2015. The Department notes the Company increased its efforts to train contractors and employees in this area in the past two years. The number of locate requests decreased by 1,914 from 2021 to 2022.

The number of mislocates for 2022 is lower than previous years. The Department encourages GMG to continually assess its training program for its locating contractors to ensure its effectiveness to avoid or reduce the potential incidents caused by the contractor. The Department will continue to monitor this metric in future annual service quality reports.

*I. GAS SYSTEM DAMAGE (DAMAGED GAS LINES) AND GAS SERVICE INTERRUPTIONS*

The Commission's 09-409 Order requires Greater Minnesota to provide data on damaged gas lines by providing copies of the Company's reports submitted to MnOPS. Table 10 summarizes GMG's gas system damage events.

**Table 10: Gas System Damage (2012-2022)**

Year	Damage caused by GMG	Damage caused by Others	Total Damage Events
2012	3	4	7
2013	0	9	9
2014	0	9	9
2015	0	7	7
2016	0	9	9 <sup>11</sup>
2017	4	8	12
2018	5	18	23
2019	4	15	19
2020	6	16	22
2021	12	12	24
2022	1	10	11

Of the 11 damage events, 1 was caused by a mismarked line on a locate (mislocate) by the Company's locating contractor.

The Department expressed concern regarding some of the incidents in 2021, which seemed quite preventable. For example, there were five incidents where a line was correctly marked, but the contractor failed to properly work around it. The Department requested Greater Minnesota continue to work with contractors and homeowners around the importance of gas infrastructure location awareness and proper excavation near marked utility service.

For 2022, the Company had its lowest number of damage events since 2016.

The Department analyzed additional information to determine whether damage events, on a per capita basis, have changed due to the Company's growth in recent years.

**Table 11: Damage per 100 Miles of Main (2012-2022)**

Year	Miles of Main	Total Damage Events	Damage per 100 Miles of Main
2012	551	7	1.27
2013	700	9	1.29
2014	706	9	1.27
2015	763	7	0.92
2016	810	9	1.11
2017	836	12	1.44
2018	871	23	2.64
2019	918	19	2.07
2020	931	22	2.36
2021	942	24	2.55
2022	925	11	1.19

Based on the information in Table 11, the damage rate per 100 miles of main decreased significantly relative to 2021. There was a four-year span from 2018-2021 where there was a significant increase over previous years. The Department notes the damage rate for 2022 is significantly lower than the four years prior and will continue to monitor this metric.

The Department recommends the Commission accept GMG's reporting on damage events for 2022.

*J. MAJOR EVENT REPORTING AND NOTIFICATION OF REPORTABLE EVENTS*

The 09-409 *Order* required Greater Minnesota to provide summaries of all major events that are immediately reportable to MnOPS and reporting of these events to both the Commission and the Department when they occur. The Company had no MnOPS reportable events during 2022.

*K. CUSTOMER-SERVICE-RELATED OPERATIONS AND MAINTENANCE EXPENSES*

The Commission requires each gas utility to provide data regarding customer-service-related operations and maintenance expenses recorded in FERC Accounts 901 and 903. The Company's annual costs are summarized in Table 12.

**Table 12: Customer Service Expenses**

Year	Expenses (\$)
2012	\$84,349
2013	\$85,034
2014	\$105,579
2015	\$99,101
2016	\$116,380
2017	\$106,407
2018	\$117,847
2019	\$116,730
2020	\$106,103
2021	\$111,387
2022	\$114,468

The amount of customer service expenses for 2022 appears reasonable given current growth and staffing changes in operations. The Department will continue to monitor this metric in future service quality reports.

**L. DISTRIBUTION SYSTEM PERFORMANCE**

Pursuant to the Commission's *Order* in its 2018 *Annual Natural Gas Service Quality Report*, Docket No. G022/M-19- 304, the Company is required to provide an update based on its filing under 49 CFR 192.1007(e) with the United States Pipeline and Hazardous Materials Safety Administration (PHMSA). In particular, the Commission requested that the Company identify its leak count by material type, the leak count on main, and the leak count on service by material. Additionally, pursuant to the Commission's *Order* in its 2017 *Annual Natural Gas Service Quality Report*, Docket No. G022/18-314, Greater Minnesota is required to provide a summary of any emergency response violations and the number of violation letters received from MNOPS during the calendar year.

This Report marks the fourth time Greater Minnesota has provided this information. Greater Minnesota provided the leak information, by type, attached as Attachment B<sup>12</sup> to its filing. The Company explained all service and main leaks identified occurred on plastic pipe. The number of system leaks is summarized in Table 13 below.

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<sup>12</sup> Attachment B refers to the PHMSA Annual Report for Calendar Year 2022 Gas Distribution System that was attached in the petition.



**Table 13: System Leaks**

Year	Leaks
2019	48
2020	36
2021	39
2022	23

Greater Minnesota stated it had no emergency response violations and received zero violation letters from MNOPS in 2022.

The Department will continue to monitor these metrics in future annual service quality reports and will provide any additional discussion and conclusions, if necessary, once sufficient data are available.

*M. EXCESS FLOW VALVES*

On February 23, 2021 the Commission ordered in Docket No. G-999/CI-18-41 that utilities submit all remaining Excess Flow Valve (EFV) status update reports in their annual Gas Service Quality Reports starting in 2021, rather than the previously ordered March 31<sup>st</sup> deadline. GMG stated that since GMG's March 31, 2020 compliance filing submitted in Docket No. G999/CI-18-41 meets the requirements of the Commission's *Order* and none of the identified customers GMG met with wanted to proceed with EFV/Shut-off Valve installation. GMG did not have any information from Docket No. G999/CI-18-41 to incorporate into its 2022 Annual Service Quality Report.<sup>13</sup> The Department has no issue regarding the EFV/Shut-off Valve installation in this service quality report.

*N. COMPARATIVE PERFORMANCE METRICS*

GMG, along with Xcel Gas, CenterPoint Energy, Minnesota Energy Resources Corporation and Great Plains Natural Gas (the Gas Utilities) made a joint filing on October 1, 2021<sup>14</sup> in response to the Commission's request that the Gas Utilities "identify already existing industry service quality comparisons, what service qualities could be best for comparison, appropriate similar utilities to compare against, and how such a national comparison could be integrated in the future service quality reporting."

In that filing the Gas Utilities delineated their efforts to identify different existing natural gas local distribution benchmarking efforts at the regional or national level. They concluded:

Because the Gas Utilities have not been able to identify any universally reported service quality metrics beyond those regarding safety and reliability, the Gas Utilities are unable to suggest service quality metrics that would be suitable for comparison. Likewise, with the exception of the information in the J.D. Power report, the Gas Utilities are not aware of a

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<sup>13</sup> Petition, page 12.

<sup>14</sup> GMG Docket No. G-022/M-21-304

means to identify similar utilities to compare against. . . the Gas Utilities are, quite frankly, at a loss as to how a regional or national comparison could be integrated into future service quality filings.

The Department advised the Commission at its agenda meeting on the Gas Utilities 2020 SRSQs on July 15, 2021 that the American Gas Association (AGA) might serve as a clearinghouse for national service quality benchmarking standards. The Department was hoping the AGA would be tracking a sufficient level of information so that it would provide an “off-the-shelf” benchmarking option for the Commission. The Gas Utilities apparently contacted AGA and AGA responded that in fact, it did not provide that service as the Gas Utilities noted in their October 1, 2021 joint filing.

The Commission, as part of its order for Docket No. G-022/M-21-304, issued August 5, 2022, included the following:

Delegated authority to the Executive Secretary to implement a working group with regulated Gas Utilities, the Department of Commerce, Minnesota Office of Pipeline Safety (MnOPS), and Commission staff to continue exploring comparative performance metrics.

**Regarding, comparative performance metrics, the Department remains willing to participate in the working group to continue exploring comparative performance metrics and looks forward to contributing.**

*O. WEB-BASED SERVICE METRICS*

The Department recommended additional information in the electric utilities service reliability and service quality reports related to web-based service metrics during the 2021 reporting cycle. As part of its order in In Docket No. G-022/M-21-304, the Commission requested “the Gas Utilities propose a web-based service metrics similar to that required of electric utilities by September 1, 2022 as a supplemental filing in their 2021 gas service quality report dockets.”<sup>15</sup>

In response to the September 1, 2022, the Gas Utilities, including GMG, submitted a joint compliance filing in which they outlined their proposed web-based service metrics. The Gas Utilities expect to first report on the below information in their annual service quality reports for 2023, which will be filed in 2024:

Percentage Uptime		[to second decimal]
	General Website	XX.XX%
	Payment Services	XX.XX%
Error Rate Percentage		[to third decimal]
	Payment Services	XX.XXX%

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<sup>15</sup> GMG Docket No. G-022/M-21-304, PUC Order

Additional metrics regarding electronic customer interaction:

- Yearly total number of website visits
- Yearly total number of logins via electronic customer communication platforms
- Yearly total number of emails or other customer service electronic communications received
- Categorization of email subject and electronic customer service communications by subject, including categories for communications related to assistance programs and disconnections as part of reporting under Minn. R. 7826.1700.

The Gas Utilities explained that while they believe their respective technology systems can facilitate this reporting, there may be situations where they cannot use an automated method to pull the data. The Gas Utilities do not believe it would be an appropriate use of resources to hand tabulate metrics. In such cases, they suggest the utility could report the information is unavailable and suggest the utility should be excused from providing that data.<sup>16</sup>

The Commission, as part of its order for Docket No. G-022/M-22-193, issued May 1, 2023, ordered the natural gas utilities to jointly file a reporting template for web-based metrics in .xlsx format within 90 days of that order, including the following:

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

In the same docket, natural gas utilities, including Greater Minnesota filed an extension request dated August 1, 2023. In it, the utilities state they have met several times but ran out of time at their last meeting to discuss the reporting template for web-based metrics. The extension request was for 30 days following the conclusion of the Natural Gas Working Group (NGWG) process or that it “be incorporated in the NGWG recommendations.”<sup>17</sup> In an order dated August 22, 2023, the Commission accepted the extension request.

The Department supports these proposals and will watch for future iterations of reporting on these metrics.

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<sup>16</sup> GMG Docket No. G-022/M-21-304, *Compliance Filing – Joint Supplemental Letter*

<sup>17</sup> GMG Docket No. G-022/M-22-193, *Joint Natural Gas Utilities Extension Variance Request*

### **III. RECOMMENDATIONS**

Based on its review, the Department recommends that the Commission accept Greater Minnesota's 2022 *Annual Service Quality Report*.

**Regarding, comparative performance metrics, the Department remains willing to participate in the working group to continue exploring comparative performance metrics and looks forward to contributing.**

## **CERTIFICATE OF SERVICE**

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

**Minnesota Department of Commerce**  
**Comments**

**Docket No. G022/M-23-81**

Dated this **25<sup>th</sup>** day of **August 2023**

**/s/Sharon Ferguson**

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