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P.O. Box 68
Le Sueur, MN 56058
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June 25, 2019

Mr. Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101-2147

RE: 2018 Annual Service Quality Report
Docket No. G022/M-19-304

Dear Mr. Wolf:

Attached hereto, please find a copy of Greater Minnesota Gas, Inc.'s Reply Comments in the above-referenced docket.

All individuals identified on the attached service list have been electronically served with the same.

Thank you for your assistance. Please do not hesitate to contact me should you have any questions or concerns or if you require additional information. My direct dial number is (507) 665-8657 and my email address is kanderson@greatermngas.com.

Sincerely,

GREATER MINNESOTA GAS, INC.

/s/

Kristine A. Anderson
Corporate Attorney

Enclosures

CERTIFICATE OF SERVICE

I, Kristine Anderson, hereby certify that I have this day served a true and correct copy of the following document to all persons at the addresses indicated on the attached list by electronic filing, electronic mail, or by depositing the same enveloped with postage paid in the United States Mail at Le Sueur, Minnesota:

**Greater Minnesota Gas, Inc.'s Reply Comments
Docket No. G022/M-19-304**

filed this 25th day of June, 2019.

/s/ Kristine A. Anderson
Kristine A. Anderson, Esq.
Corporate Attorney
Greater Minnesota Gas, Inc.

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.	202 S. Main Street Le Sueur, MN 56058	Electronic Service	No	OFF_SL_19-304_M-19-304
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-304_M-19-304
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-304_M-19-304
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_19-304_M-19-304
Brian	Gardow	bgardow@greatermngas.com	Greater Minnesota Gas, Inc.	PO Box 68 Le Sueur, MN 56058	Electronic Service	No	OFF_SL_19-304_M-19-304
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.	202 South Main Street P.O. Box 68 Le Sueur, MN 56058	Electronic Service	No	OFF_SL_19-304_M-19-304
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.	PO Box 68 202 South Main Street Le Sueur, MN 56058	Electronic Service	No	OFF_SL_19-304_M-19-304
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_19-304_M-19-304

STATE OF MINNESOTA

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie Sieben	Chair
Dan Lipschultz	Commissioner
Valerie Means	Commissioner
Matt Schuerger	Commissioner
John Tuma	Commissioner

MPUC Docket No. G022/M-19-304

In the Matter of Greater Minnesota
Gas, Inc.'s Annual Gas Service
Quality Report for the
Calendar Year of 2018

REPLY COMMENTS

OVERVIEW

Greater Minnesota Gas, Inc. (“GMG”) respectfully requests that its Annual Gas Service Quality Report for 2018 be approved. GMG filed its report on May 1, 2019. The Minnesota Department of Commerce, Division of Energy Resources (“Department”) filed its Comments in Response to GMG’s Reports on June 17, 2019. The Office of Attorney General – Residential Utilities and Antitrust Division filed its Comments on June 17, 2019. This submission constitutes GMG’s Reply to both the Department’s Comments and the OAG’s Comments.

ISSUE SUMMARY

In its Comments, the Department generally acknowledged that GMG provides good customer service and that it complied with its reporting requirements to demonstrate that. In the interest of exploring certain isolated situations, the Department requested additional information regarding two particular reporting statistics. GMG appreciates the opportunity to respond to the Department’s and the OAG’s Comments and discusses them herein. GMG’s Reply Comments address the following areas:

- Information contained in the November, 2018 Cold Weather Rule (CWR) Report.
- Clarification regarding one service installation to an interruptible customer in July, 2018.
- Provision of supplemental information to the 2018 Annual Service Quality Report.
- Discussion regarding the additional integrity management related reporting metrics proposed by the OAG.

DISCUSSION IN REPLY

GMG appreciates the Department’s discussion set forth in its Comments. GMG is also appreciative of the OAG’s discussion regarding proposed additional metrics for service

quality analysis; and, while GMG believes that a different approach is most appropriate, GMG recognizes the value in discussing reporting options.

1. GMG's CWR Report for November 2018 Has Been Corrected.

As the Department noted in its Comments, GMG's monthly CWR report for November, 2018 contained an inadvertent error, having apparently been saved prior to October's data being overwritten rather than afterward. The administrative employee responsible for maintaining the report reviewed GMG's historical data and confirmed that, while the October 2018 was filed correctly, the information in the November, 2018 report was incorrect. GMG submitted a corrected CWR report for November, 2018 contemporaneously with the filing of these Reply Comments and has attached a copy hereto as Attachment A. GMG apologizes for any inconvenience caused by the incorrect report having been filed.

2. GMG Installed a Service Line to an Interruptible Customer in July, 2018 Within a Reasonable Time.

In its Comments, the Department requested that GMG clarify the circumstances surrounding the installation time for service to an interruptible customer in July, 2018, which took 35 days. The customer in question placed an early order for a service line for a grain drying facility, knowing that it would not require gas service to be available until October. GMG and the customer agreed that GMG would install the service line at some point during the summer as a function of construction scheduling such that the line would be installed when a crew was going to be in the same general area in order to maximize efficiency. The customer was quite pleased with the timing of the installation, as it was ultimately much earlier than the customer anticipated or needed the installation to be complete. GMG continues to pride itself on working with its customers to schedule installations as appropriate.

3. GMG's 2018 Annual Service Quality Report Is Supplemented with Additional Information Regarding Various Topics Pursuant to the Commission's Order in Docket No. G022/M-18-314.

The Commission's Order in GMG's 2017 Annual Service Quality Report docket was released in April, 2019 at a point in time when it overlapped GMG's preparation of its 2018 Annual Service Quality Report filed herein. The Order in the 2017 docket required GMG to include certain additional data in its 2018 Report. Accordingly, GMG supplements its 2018 Report to include the required information, set forth below:

- GMG's filing under 49 CFR 192.1007 (e) related to its integrity management plan performance, monitoring, and evaluation to establish a baseline for ongoing reporting is attached hereto at Attachment B. [Note: GMG filed an initial report that identified 23 damages; and, subsequently, it filed a supplemental amended report that identified 21 incidents of excavation damage, having removed two damage incidents that were caused

by gopher chews rather than resulting from excavation damage. Both reports are attached.]

- GMG did not have any 2018 emergency response violations cited by MNOPS.
- GMG did not receive any violation letters from MNOPS during 2018.
- While GMG appreciates the opportunity to discuss how to provide ongoing monitoring and metrics toward the deployment of excess flow valves and manual shutoff valves pursuant to the Commission's Order in Docket No. G999/CI-18-41, GMG notes that its affected customer numbers are negligible as compared to those of other utilities; and, as such, GMG believes that those utilities are better suited to develop workable and meaningful monitoring metrics related to the issue for the Commission's purposes.

4. The Commission, the Other Utility Regulatory Oversight Bodies, the Public, and the Regulated Utilities Will Be Best Served By Retaining the Current Scope of Each Body's Arena of Review and Regulation.

As the Commission is aware, metrics like those suggested in the OAG's Comments are provided to the bodies that are charged with regulatory oversight of safety for natural gas lines – the Pipeline and Hazardous Materials Safety Administration (PHMSA) and the Minnesota Office of Pipeline Safety (MNOPS). The Commission has indicated in other dockets that collecting information just for the sake of having it is not an effective use of resources, either for Commission and Department staff or for the utilities. Given that the system integrity metrics are already provided to PHMSA and are reviewed annually by MNOPS, any deficiencies are addressed by experts in that area.

Moreover, not every regulated natural gas utility is subject to having integrity management systems that require programmatic replacements. For example, not every utility has high consequence areas on its transmission line. Similarly, less mature systems – like GMG's – do not have legacy materials such as cast iron or bare steel, nor do they have replacement projects; thus, they do not require the programmatic replacements that other utilities have. The proposed metrics do not universally apply to all five utilities; and, instituting universal reporting requirements for all of them would inevitably result in a comparison of utility spending on programs. That could easily lead to improper conclusions being drawn, such as implying that those utilities that do not spend on integrity management are less concerned with public safety or that those utilities with high spend levels are cavalier about such spending.

Perhaps most importantly, requiring integrity management reporting to the Commission could easily result in inconsistent regulation across regulatory bodies. In the event that the Commission would choose to also review the integrity management information and provide regulatory guidance despite the fact that other bodies already conduct reviews, it would create a very real possibility of divergent and/or conflicting orders and confusion with regard to compliance requirements. GMG believes that the Commission would be better served by communicating directly with MNOPS if it seeks information with regard to those issues. GMG also believes that each governing body will be best served, as will the public and the utilities, by reviewing and regulating within the scope of each body's area of expertise and avoiding overlap

to the extent possible. In this specific instance, that would result in the Commission focusing on customer service by the utilities and PHMSA and MNOPS focusing on system integrity, safety, emergency response, and similar service by the utilities. That said, in the event that the Commission is inclined to require that the OAG's proposed metrics be included in service quality reporting, GMG respectfully submits that the utilities required to submit that information should be limited to CenterPoint, based on its prior docket agreement, and those utilities with GUIC riders related to TIMP and DIMP expenditures.

CONCLUSION

GMG remains dedicated to the provision of exceptional service and continuously seeks ways to increase its level of service. Likewise, safety remains GMG's first priority and GMG always strives to improve its already excellent safety record. GMG's customers believe that GMG gives them excellent service; and, GMG takes great pride in the fact that it provides personal customer service to every individual that contacts it—whether a customer or not. As GMG has previously noted, while no utility or other business can ever provide absolutely perfect service, GMG continues to try. GMG respectfully requests that the Commission approve its 2018 Annual Service Quality Report.

Dated: June 25, 2019

Respectfully submitted,

/s/

Kristine A. Anderson Corporate Attorney

Greater Minnesota Gas, Inc.

P.O. Box 68

202 S. Main Street Le Sueur, MN 56068

ATTACHMENT A
NOVEMBER 2018 Monthly

Minnesota Public Utilities Commission

Minnesota Cold Weather Rule Compliance Questionnaire

Version 3

Company Submitting Reply:	Greater Minnesota Gas, Inc.	▼	<i>Required</i>
Reporting Year:	2018	▼	<i>Required</i>
Reporting Period:	November	▼	<i>Required</i>

Utility Monthly Reports (216B.091)

Company: Greater Minnesota Gas, Inc. for report period ending: November, 2018

1	Number of Residential Customer Accounts:	7,765
2	Number of Past Due Residential Customer Accounts:	469
3	Number of Cold Weather Protection Requests:	2

RECONNECTION AT BEGINNING OF COLD WEATHER MONTHS

4	Number of "Right to Appeal" notices mailed to customers:	0
5	<i>Intentionally Blank</i>	
6	Number of customer accounts granted reconnection <u>request</u> :	3

INABILITY TO PAY (ITP)

This entire section intentionally left blank

10% PLAN (TPP)

This entire section intentionally left blank

Company: Greater Minnesota Gas, Inc. for report period ending: November, 2018

PAYMENT SCHEDULE (PS)

16	Number of "Right to Appeal" notices mailed to customers:	0
a)	Number of PS requests received	3
17	<i>Intentionally Blank</i>	
18	Number of PS negotiations mutually agreed upon:	3
19	<i>Intentionally Blank</i>	

DISCONNECTIONS

20	Number of disconnection notices mailed to customers:	0
21	Number of customer accounts disconnected who did not seek protection: Duplicate columns for use in April and October April 1-15 and October 1-15 in 1st column April 16-30 and October 16-31 in 2nd column All other months, use 1st column only	
a)	# Electric - heat affected	0
b)	# Electric - heat not affected	0
c)	# Gas - heat affected	0
d)	# Gas - heat not affected	0
e)	Total # disconnected	0
22	Number of customer accounts disconnected seeking protection:	
a)	# Electric - heat affected	0
b)	# Electric - heat not affected	0
c)	# Gas - heat affected	0
d)	# Gas - heat not affected	0
e)	Total # disconnected (See Note)	0
23	Number of customer accounts disconnected for nonpayment (auto-calculation of #21e+ #22e):	0

Company: Greater Minnesota Gas, Inc. for report period ending: November, 2018

DOLLAR VALUE

24	Total dollars past due on all residential accounts:	\$39,929
25	Average past due dollar amount per past due account (auto-calculation of #24 ÷ #2):	\$85
26	Total dollars received from energy assistance programs:	\$6,661
27	Total dollars received from other sources (private organizations):	\$0
28	Total Revenue from sales to residential accounts:	\$641,048
29	Average monthly residential bill: (auto-calculation of #28 ÷ #1)	\$83
30	<i>Intentionally Blank</i>	
31	Total residential account write-offs due to uncollectible:	\$17

DISCONNECTION DURATION

32	Number of customer accounts disconnected 24 hours or more:	
a)	# Electric - heat affected	0
b)	# Electric - heat not affected	0
c)	# Gas - heat affected	2
d)	# Gas - heat not affected	0
e)	Total # disconnected	2
33	<i>Intentionally Blank</i>	
34	Number occupied heat-affected accounts disconnected 24 hours or more (to include customers who did and did not seek protection).	2
35	<i>Intentionally Blank</i>	
36	<i>Intentionally Blank</i>	

RECONNECTION DATA

NOVEMBER 2018 Monthly

37	# Accounts reconnected	3
38	# Accounts remaining disconnected	2
a)	1-30 days	0
b)	31-60 days	1
c)	61+ days	1

[END]

cwrutilrpt.xls ver 3.0

ATTACHMENT B

NOTICE: This report is required by 49 CFR Part 191. Failure to report can result in a civil penalty not to exceed 100,000 for each violation for each day that such violation persists except that the maximum civil penalty shall not exceed \$1,000,000 as provided in 49 USC 60122.

OMB NO: 2137-0629
EXPIRATION DATE: 10/31/2021



U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration

Initial Date Submitted:

03/15/2019

Form Type:

INITIAL

Date Submitted:

ANNUAL REPORT FOR CALENDAR YEAR 2018 GAS DISTRIBUTION SYSTEM

A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2137-0629. Public reporting for this collection of information is estimated to be approximately 16 hours per response, including the time for reviewing instructions, gathering the data needed, and completing and reviewing the collection of information. All responses to this collection of information are mandatory. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, PHMSA, Office of Pipeline Safety (PHP-30) 1200 New Jersey Avenue, SE, Washington, D.C. 20590.

Important: Please read the separate instructions for completing this form before you begin. They clarify the information requested and provide specific examples. If you do not have a copy of the instructions, you can obtain one from the PHMSA Pipeline Safety Community Web Page at <http://www.phmsa.dot.gov/pipeline/library/forms>.

PART A - OPERATOR INFORMATION	(DOT use only)	20190917-38367
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1. Name of Operator	GREATER MINNESOTA GAS INC.
2. LOCATION OF OFFICE (WHERE ADDITIONAL INFORMATION MAY BE OBTAINED)	
2a. Street Address	202 SOUTH MAIN STREET
2b. City and County	Le Sueur
2c. State	MN
2d. Zip Code	56058
3. OPERATOR'S 5 DIGIT IDENTIFICATION NUMBER	30967
4. HEADQUARTERS NAME & ADDRESS	
4a. Street Address	202 SOUTH MAIN STREET
4b. City and County	LE SUEUR
4c. State	MN
4d. Zip Code	56058
5. STATE IN WHICH SYSTEM OPERATES	MN
6. THIS REPORT PERTAINS TO THE FOLLOWING COMMODITY GROUP (Select Commodity Group based on the predominant gas carried and complete the report for that Commodity Group. File a separate report for each Commodity Group included in this OPID.)	
Natural Gas	
7. THIS REPORT PERTAINS TO THE FOLLOWING TYPE OF OPERATOR (Select Type of Operator based on the structure of the company included in this OPID for which this report is being submitted.):	
Investor Owned	

PART B - SYSTEM DESCRIPTION

1.GENERAL	STEEL				PLASTIC	CAST/ WROUGHT IRON	DUCTILE IRON	COPPER	OTHER	RECONDITION ED CAST IRON	SYSTEM TOTAL
	UNPROTECTED		CATHODICALLY PROTECTED								
	BARE	COATED	BARE	COATED							
MILES OF MAIN	0	0	0	12.757	859.053	0	0	0	0	0	871.81
NO. OF SERVICES	0	0	0	2	8554	0	0	0	0	0	8556

2.MILES OF MAINS IN SYSTEM AT END OF YEAR											
MATERIAL	UNKNOWN	2" OR LESS	OVER 2" THRU 4"	OVER 4" THRU 8"	OVER 8" THRU 12"	OVER 12"	SYSTEM TOTALS				
STEEL	0	0.097	8.91	3.75	0	0	12.757				
DUCTILE IRON	0	0	0	0	0	0	0				
COPPER	0	0	0	0	0	0	0				
CAST/WROUGHT IRON	0	0	0	0	0	0	0				
PLASTIC PVC	0	0	0	0	0	0	0				
PLASTIC PE	0	474.907	313.317	70.829	0	0	859.053				
PLASTIC ABS	0	0	0	0	0	0	0				
PLASTIC OTHER	0	0	0	0	0	0	0				
OTHER	0	0	0	0	0	0	0				
RECONDITIONED CAST IRON	0	0	0	0	0	0	0				
TOTAL	0	475.004	322.227	74.579	0	0	871.81				
Describe Other Material:											
3.NUMBER OF SERVICES IN SYSTEM AT END OF YEAR											
					AVERAGE SERVICE LENGTH: 234						
MATERIAL	UNKNOWN	1" OR LESS	OVER 1" THRU 2"	OVER 2" THRU 4"	OVER 4" THRU 8"	OVER 8"	SYSTEM TOTALS				
STEEL	0	2	0	0	0	0	2				
DUCTILE IRON	0	0	0	0	0	0	0				
COPPER	0	0	0	0	0	0	0				
CAST/WROUGHT IRON	0	0	0	0	0	0	0				
PLASTIC PVC	0	0	0	0	0	0	0				
PLASTIC PE	0	7282	1268	3	1	0	8554				
PLASTIC ABS	0	0	0	0	0	0	0				
PLASTIC OTHER	0	0	0	0	0	0	0				
OTHER	0	0	0	0	0	0	0				
RECONDITIONED CAST IRON	0	0	0	0	0	0	0				
TOTAL	0	7284	1268	3	1	0	8556				
Describe Other Material:											
4.MILES OF MAIN AND NUMBER OF SERVICES BY DECADE OF INSTALLATION											
	UNKNOWN	PRE-1940	1940-1949	1950-1959	1960-1969	1970-1979	1980-1989	1990-1999	2000-2009	2010-2019	TOTAL

MILES OF MAIN	0	0	0	.99	0	0	0	151.9	333.607	385.313	871.81
NUMBER OF SERVICES	0	0	0	2	0	0	0	1268	2623	4663	8556

PART C - TOTAL LEAKS AND HAZARDOUS LEAKS ELIMINATED/REPAIRED DURING THE YEAR

CAUSE OF LEAK	MAINS		SERVICES	
	TOTAL	HAZARDOUS	TOTAL	HAZARDOUS
CORROSION FAILURE				
NATURAL FORCE DAMAGE				
EXCAVATION DAMAGE	3	3	18	18
OTHER OUTSIDE FORCE DAMAGE				
PIPE, WELD OR JOINT FAILURE				
EQUIPMENT FAILURE				
INCORRECT OPERATIONS				
OTHER CAUSE			2	

NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR : 21

PART D - EXCAVATION DAMAGE

1. TOTAL NUMBER OF EXCAVATION DAMAGES BY APPARENT ROOT CAUSE: 23

- a. One-Call Notification Practices Not Sufficient: 6
- b. Locating Practices Not Sufficient: 5
- c. Excavation Practices Not Sufficient: 10
- d. Other: 2

2. NUMBER OF EXCAVATION TICKETS : 9312

PART E - EXCESS FLOW VALUE (EFV) AND SERVICE VALVE DATA

Total Number Of Services with EFV Installed During Year: 539

Estimated Number Of Services with EFV In the System At End Of Year: 4436

* Total Number of Manual Service Line Shut-off Valves Installed During Year: 9

* Estimated Number of Services with Manual Service Line Shut-off Valves Installed in the System at End of Year: 26

**These questions only pertain to reporting years 2017 & beyond.*

PART F - LEAKS ON FEDERAL LAND

TOTAL NUMBER OF LEAKS ON FEDERAL LAND REPAIRED OR SCHEDULED TO REPAIR: 0

PART G-PERCENT OF UNACCOUNTED FOR GAS

UNACCOUNTED FOR GAS AS A PERCENT OF TOTAL CONSUMPTION FOR THE 12 MONTHS ENDING JUNE 30 OF THE REPORTING YEAR.

[(PURCHASED GAS + PRODUCED GAS) MINUS (CUSTOMER USE + COMPANY USE + APPROPRIATE ADJUSTMENTS)] DIVIDED BY (CUSTOMER USE + COMPANY USE + APPROPRIATE ADJUSTMENTS) TIMES 100 EQUALS PERCENT UNACCOUNTED FOR.

FOR YEAR ENDING 6/30: 0.14%

PART H - ADDITIONAL INFORMATION

PART I - PREPARER

Taylor Larson, Engineer (Preparer's Name and Title)	(507) 665-8647 _____ (Area Code and Telephone Number)
tlarson@greatermngas.com (Preparer's email address)	_____ (Area Code and Facsimile Number)

NOTICE: This report is required by 49 CFR Part 191. Failure to report can result in a civil penalty not to exceed 100,000 for each violation for each day that such violation persists except that the maximum civil penalty shall not exceed \$1,000,000 as provided in 49 USC 60122.

OMB NO: 2137-0629
EXPIRATION DATE: 10/31/2021



U.S Department of Transportation
Pipeline and Hazardous Materials Safety Administration

Initial Date Submitted:

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Form Type:

SUPPLEMENTAL

Date Submitted:

06/04/2019

ANNUAL REPORT FOR CALENDAR YEAR 2018 GAS DISTRIBUTION SYSTEM

A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2137-0629. Public reporting for this collection of information is estimated to be approximately 16 hours per response, including the time for reviewing instructions, gathering the data needed, and completing and reviewing the collection of information. All responses to this collection of information are mandatory. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, PHMSA, Office of Pipeline Safety (PHP-30) 1200 New Jersey Avenue, SE, Washington, D.C. 20590.

Important: Please read the separate instructions for completing this form before you begin. They clarify the information requested and provide specific examples. If you do not have a copy of the instructions, you can obtain one from the PHMSA Pipeline Safety Community Web Page at <http://www.phmsa.dot.gov/pipeline/library/forms>.

PART A - OPERATOR INFORMATION

(DOT use only)

20190917-38856

1. Name of Operator	GREATER MINNESOTA GAS INC.
2. LOCATION OF OFFICE (WHERE ADDITIONAL INFORMATION MAY BE OBTAINED)	
2a. Street Address	202 SOUTH MAIN STREET
2b. City and County	Le Sueur
2c. State	MN
2d. Zip Code	56058
3. OPERATOR'S 5 DIGIT IDENTIFICATION NUMBER	30967
4. HEADQUARTERS NAME & ADDRESS	
4a. Street Address	202 SOUTH MAIN STREET
4b. City and County	LE SUEUR
4c. State	MN
4d. Zip Code	56058
5. STATE IN WHICH SYSTEM OPERATES	MN
6. THIS REPORT PERTAINS TO THE FOLLOWING COMMODITY GROUP (Select Commodity Group based on the predominant gas carried and complete the report for that Commodity Group. File a separate report for each Commodity Group included in this OPID.)	
Natural Gas	
7. THIS REPORT PERTAINS TO THE FOLLOWING TYPE OF OPERATOR (Select Type of Operator based on the structure of the company included in this OPID for which this report is being submitted.):	
Investor Owned	

PART B - SYSTEM DESCRIPTION

1.GENERAL

	STEEL				PLASTIC	CAST/ WROUGHT IRON	DUCTILE IRON	COPPER	OTHER	RECONDITION ED CAST IRON	SYSTEM TOTAL
	UNPROTECTED		CATHODICALLY PROTECTED								
	BARE	COATED	BARE	COATED							
MILES OF MAIN	0	0	0	12.757	859.053	0	0	0	0	0	871.81
NO. OF SERVICES	0	0	0	2	8554	0	0	0	0	0	8556

2.MILES OF MAINS IN SYSTEM AT END OF YEAR											
MATERIAL	UNKNOWN	2" OR LESS	OVER 2" THRU 4"	OVER 4" THRU 8"	OVER 8" THRU 12"	OVER 12"	SYSTEM TOTALS				
STEEL	0	0.097	8.91	3.75	0	0	12.757				
DUCTILE IRON	0	0	0	0	0	0	0				
COPPER	0	0	0	0	0	0	0				
CAST/WROUGHT IRON	0	0	0	0	0	0	0				
PLASTIC PVC	0	0	0	0	0	0	0				
PLASTIC PE	0	474.907	313.317	70.829	0	0	859.053				
PLASTIC ABS	0	0	0	0	0	0	0				
PLASTIC OTHER	0	0	0	0	0	0	0				
OTHER	0	0	0	0	0	0	0				
RECONDITIONED CAST IRON	0	0	0	0	0	0	0				
TOTAL	0	475.004	322.227	74.579	0	0	871.81				
Describe Other Material:											
3.NUMBER OF SERVICES IN SYSTEM AT END OF YEAR											
					AVERAGE SERVICE LENGTH: 234						
MATERIAL	UNKNOWN	1" OR LESS	OVER 1" THRU 2"	OVER 2" THRU 4"	OVER 4" THRU 8"	OVER 8"	SYSTEM TOTALS				
STEEL	0	2	0	0	0	0	2				
DUCTILE IRON	0	0	0	0	0	0	0				
COPPER	0	0	0	0	0	0	0				
CAST/WROUGHT IRON	0	0	0	0	0	0	0				
PLASTIC PVC	0	0	0	0	0	0	0				
PLASTIC PE	0	7282	1268	3	1	0	8554				
PLASTIC ABS	0	0	0	0	0	0	0				
PLASTIC OTHER	0	0	0	0	0	0	0				
OTHER	0	0	0	0	0	0	0				
RECONDITIONED CAST IRON	0	0	0	0	0	0	0				
TOTAL	0	7284	1268	3	1	0	8556				
Describe Other Material:											
4.MILES OF MAIN AND NUMBER OF SERVICES BY DECADE OF INSTALLATION											
	UNKNOWN	PRE-1940	1940-1949	1950-1959	1960-1969	1970-1979	1980-1989	1990-1999	2000-2009	2010-2019	TOTAL

MILES OF MAIN	0	0	0	.99	0	0	0	151.9	333.607	385.313	871.81
NUMBER OF SERVICES	0	0	0	2	0	0	0	1268	2623	4663	8556

PART C - TOTAL LEAKS AND HAZARDOUS LEAKS ELIMINATED/REPAIRED DURING THE YEAR

CAUSE OF LEAK	MAINS		SERVICES	
	TOTAL	HAZARDOUS	TOTAL	HAZARDOUS
CORROSION FAILURE				
NATURAL FORCE DAMAGE				
EXCAVATION DAMAGE	3	3	18	18
OTHER OUTSIDE FORCE DAMAGE				
PIPE, WELD OR JOINT FAILURE				
EQUIPMENT FAILURE				
INCORRECT OPERATIONS				
OTHER CAUSE				

NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR : 21

PART D - EXCAVATION DAMAGE

1. TOTAL NUMBER OF EXCAVATION DAMAGES BY APPARENT ROOT CAUSE: 21

- a. One-Call Notification Practices Not Sufficient: 6
- b. Locating Practices Not Sufficient: 5
- c. Excavation Practices Not Sufficient: 10
- d. Other: _____

2. NUMBER OF EXCAVATION TICKETS : 9312

PART E - EXCESS FLOW VALUE (EFV) AND SERVICE VALVE DATA

Total Number Of Services with EFV Installed During Year: 539

Estimated Number Of Services with EFV In the System At End Of Year: 4436

* Total Number of Manual Service Line Shut-off Valves Installed During Year: 9

* Estimated Number of Services with Manual Service Line Shut-off Valves Installed in the System at End of Year: 26

**These questions only pertain to reporting years 2017 & beyond.*

PART F - LEAKS ON FEDERAL LAND

TOTAL NUMBER OF LEAKS ON FEDERAL LAND REPAIRED OR SCHEDULED TO REPAIR: 0

PART G-PERCENT OF UNACCOUNTED FOR GAS

UNACCOUNTED FOR GAS AS A PERCENT OF TOTAL CONSUMPTION FOR THE 12 MONTHS ENDING JUNE 30 OF THE REPORTING YEAR.

[(PURCHASED GAS + PRODUCED GAS) MINUS (CUSTOMER USE + COMPANY USE + APPROPRIATE ADJUSTMENTS)] DIVIDED BY (CUSTOMER USE + COMPANY USE + APPROPRIATE ADJUSTMENTS) TIMES 100 EQUALS PERCENT UNACCOUNTED FOR.

FOR YEAR ENDING 6/30: 0.14%

PART H - ADDITIONAL INFORMATION

PART I - PREPARER

Taylor Larson, Engineer (Preparer's Name and Title)	(507) 665-8647 _____ (Area Code and Telephone Number)
tlarson@greatermngas.com (Preparer's email address)	_____ (Area Code and Facsimile Number)