

June 24, 2015

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

RE: **Response Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. G004/M-15-390

Dear Mr. Wolf:

This letter serves as the response comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

*2014 Annual Service Quality Report* submitted by Great Plains, a Division of MDU Resources Group, Inc.

On April 30, 2015, Great Plains (the Company) filed its *2014 Annual Service Quality Report* (Report).

On June 1, 2015, the Department submitted its Comments which recommended that the Minnesota Public Utilities Commission (Commission) accept Great Plains' filing and requested that, in Reply Comments, the Company provide a discussion regarding the reasons for the significant increase in duration of service interruptions during July, August, and October of 2014.

Great Plains submitted its Reply Comments on June 10, 2015. Great Plains summarized that the increased duration in service outages was caused by unique circumstances in the months of July, August, and October and provided in the reasons for the significant increases in duration of service:

- July: The absence of one of the affected customers from their home at the time of the interruption hindered the Company's ability to re-light the customer's pilot after the repair to the main was completed;
- August: Two interruptions were caused by contractor hits to PVC service lines which the Company is currently replacing. Great Plains replaced the lines rather than fix the damaged area, extending the length of the interruption; and
- October: The increased interruptions were due to contractors hitting a gas main(s).

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Great Plains also provided the average duration excluding the above interruptions. The remaining interruptions would be more in line with the Company's 2013 average interruption time of 203 minutes.

Based on its analysis, the Department continues to recommend that the Commission accept Great Plains' Report.

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

Sincerely,

/s/ MICHELLE ST. PIERRE  
Financial Analyst  
651-539-1835

MS/lt

## **CERTIFICATE OF SERVICE**

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

**Minnesota Department of Commerce  
Response Comments**

**Docket No. G004/M-15-390**

**Dated this 24<sup>th</sup> day of June 2015**

**/s/Sharon Ferguson**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck, ND 585014092	Electronic Service	No	OFF_SL_15-390_M-15-390
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_15-390_M-15-390
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_15-390_M-15-390
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_15-390_M-15-390
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_15-390_M-15-390