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September 27, 2024

**VIA ELECTRONIC FILING**

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

RE: Annual Service Quality Report for 2023  
Docket No. G022/M-24-35

Dear Mr. Seuffert:

Greater Minnesota Gas, Inc. ("GMG") filed its Annual Service Quality Report for 2023 on May 1, 2024. The Minnesota Department of Commerce, Division of Energy Resources ("the Department") filed its Comments on September 18, 2024. This letter serves as GMG's Reply in lieu of filing Reply Comments.

GMG appreciates the Department's considered analysis and its recommendation that the Commission accept its Annual Service Quality Report for 2023.

In its Comments, the Department requested that GMG discuss an apparent inconsistency in GMG's historic disconnection data for 2016 and 2018 in reply, because the metrics shown for the number of customers restored to service within 24 hours was higher than the number of disconnected accounts for those years. The historic data for the table was taken from reviewing prior cold weather rule reports; and, the former version of cold weather rule report forms were used for both of the years in question. As GMG has discussed in previous service quality dockets that raised questions about apparent discrepancies across reporting metrics, the formerly used cold weather rule reports only reflected status at one particular point in time and did not reflect all of the detail of transitions that occurred during the intervening time periods between reports or within the timeframe of a report itself. For example, a cold weather report provided only the total number of disconnected accounts as of that report's week's end. So, the number customers that were disconnected and reconnected within 24 hours during the week would be included in the count for the 24-hour metric; however, they would not be included in the count for disconnected accounts because they did not remain disconnected at the end of the week. While GMG appreciates that the metrics appear to be inconsistent, they are actually a function of what data was captured in historic reports. GMG apologizes for any confusion.



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GMG thanks the Department for its recommendation that the Commission approve GMG's Annual Service Quality Report for 2023 and respectfully requests that the Commission concurs.

Please do not hesitate to contact me should there be any questions or concerns.

Sincerely,

GREATER MINNESOTA GAS, INC.

/s/

Kristine A. Anderson  
Corporate Attorney

cc: Service List