



85 7th Place East, Suite 500, St. Paul, MN 55101-2198

main: 651.296.4026

tty: 651.296.2860

fax: 651.297.7891

www.energy.mn.gov

June 27, 2013

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce, Division of Energy Resources
Docket No. G022/M-13-362

Dear Dr. Haar:

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

2012 *Annual Service Quality Report* (Report) submitted by Greater Minnesota Gas, Inc. (GMG or Company).

The 2012 *Annual Service Quality Report* was filed on May 1, 2013 by:

Nikki Kupser
Compliance & Regulatory Administrator
Greater Minnesota Gas, Inc.
202 South Main Street
Le Sueur, Minnesota 56058-1911

Based on its review of GMG's 2012 *Annual Service Quality Report*, the Department recommends that the Commission **accept** the Company's Report pending GMG's response to various inquiries and the provision of additional information in *Reply Comments*. The Department's recommendations are listed at the conclusion of these *Comments*.

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

Sincerely,

/s/ LAURA BETH LAUFMANN
Rates Analyst
651-296-8663

LBL/ja
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET NO. G022/M-13-362

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 Resources¹ (Department) and all Minnesota regulated gas utilities in Docket No. G999/CI-09-409. Various rounds of comments and discussion occurred in this docket and the issues came before the Commission on August 5, 2010. During the August 5, 2010 Commission Meeting, Greater Minnesota (Greater Minnesota, GMG, or 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 that Greater Minnesota must provide service quality information in generally 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 Docket No. G022/M-11-356. The Department recommended that the Commission accept this Report and that Greater Minnesota provide, in subsequent service quality reports, a breakdown of what type of party (e.g., third-party contractor, utility personnel, customer) caused each particular gas line damage event to the Company's distribution system.

¹ At the time the Commission opened the investigation, the Department was referred to as the Minnesota Office of Energy Security, or OES.

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 reporting²; GMG did not attend the workgroup meeting.

On October 11, 2012, the Company filed its calendar year 2011 *Annual Service Quality Report*. The Department withheld its recommendation regarding the 2011 report pending the provision of additional information in *Reply Comments*. GMG and Department staff met on April 26, 2013 to discuss the Department's requests; GMG filed its *Reply Comments* on May 1, 2013.

Also on May 1, 2013, the Company filed its calendar year 2012 *Annual Service Quality Report* (Report). This is the third annual Report filed by Greater Minnesota.

The Department provides its analysis below.

II. THE DEPARTMENT'S ANALYSIS

Per the Commission's January 18 *Order*, Greater Minnesota was allowed to defer providing information for certain reporting requirements until January 1, 2011; therefore, this Report marks the second time that Greater Minnesota has provided information for each reporting requirement. The following reporting requirements are discussed for the second time in this Report: Telephone Response Time, Meter Reading Performance, Service Extension Request Time, Customer Deposits, Customer Complaints, Gas Emergency Information, Minnesota Office of Pipeline Safety (MNOPS) Damage Reports, Service Interruptions, Gas Emergency Response Time, and Customer Service Expenditures. The Report contains the third year of data for the remaining reporting metrics: Service Disconnections and System Damage.

The Department discusses, separately, each reporting requirement below.

A. CALL CENTER RESPONSE TIME

The Commission required each utility to provide in its annual service quality report call center response time in terms of the percentage of calls answered within 20 seconds. The Department notes that Minnesota Rules, part 7826.1200 requires Minnesota's electric utilities to answer, on

² See Attachments 1 and 2 for a matrix summarizing each utility's reporting content for each metric and a workgroup agenda.

an annual average, 80 percent of calls made to the business office during regular business hours within 20 seconds.

For GMG, the Commission's 09-409 *Order* requires 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.

Greater Minnesota reported monthly data indicating the number of calls received by the Company in 2012. The Company stated that all calls are answered live within three rings; if the Company does not answer within three rings, the call is automatically forwarded to Greater Minnesota's after-hours answering service.³ As such, Greater Minnesota concluded that all 5,887 in-coming calls to the Company were answered within 20 seconds. Based on the Department's experience, it does not disagree with the Company's conclusion.

The Department concludes that it is likely that calls to the Company are answered promptly.

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, in its Report, the meter reading performance data per Minnesota Rules.

The Company reported the number of active meters on the system as 54,169 in 2012 and 48,174 in 2011. In 2012 the Company was able to read 42,733 meters, or 78.89 percent of total system meters. This is a decrease from the number and percentage of meters read in 2011, 47,422 and 98.44 percent respectively. The percentage of meters read by GMG personnel in 2012 compared to those read in 2011 indicates a drop of nearly 20 percent. The Department requests that GMG provide, in *Reply Comments*, a full explanation of why the percentage of meters read by utility personnel decreased from 2011 to 2012.

Greater Minnesota reported no meters unread for more than six months in calendar year 2012. Meter reading staffing levels remained constant at 2 from 2011 to 2012. The Department will continue to monitor these metrics.

³ It has been the Department's experience that when a phone call is forwarded to the Company's answering service, the response from the answering service typically occurs one additional ring after the call is transferred.

C. INVOLUNTARY SERVICE DISCONNECTIONS

The Commission's 09-409 *Order* requires GMG to provide involuntary service disconnection data in the same manner that it reports these data under Minnesota Statutes §§ 216B.091 and 216B.096 which relate to the Cold Weather Rule. Table 1 shows GMG's number of disconnections over the past three years.

Table 1: Involuntary Disconnections

2010	361
2011	205
2012	499

As shown above, the Company reported 499 involuntary disconnects in 2012, 143 percent more than the involuntary disconnects reported in 2011, and 40 percent more than were reported in 2010. The Department requests that the Company provide, in *Reply Comments*, an explanation of why the level of involuntary disconnects increased so significantly in 2012.

The Department reviewed GMG's monthly disconnection data and notes that disconnection levels were higher in the spring and summer of calendar year 2012 (roughly coinciding with the end of the Cold Weather Rule period).

The Department also notes that the number of past due residential accounts averaged between 9 and 5 percent of total residential accounts throughout 2012. This is identical to the range of percentages of past due accounts reported in 2011. The Department will continue to monitor this metric and will make additional recommendations in the future as needed.

D. SERVICE EXTENSION REQUESTS

Greater Minnesota is required to report service extension request response time, except for service connections related to Minn. Stat. §§ 216B.091 and 216B.096, subd. 11. This reporting metric includes data for extensions to locations not previously served by the utility and areas previously served by the utility. For calendar year 2012, the Company extended service to 5 customers at a location not previously served by Greater Minnesota and to 800 customers along existing main. The Company reported an average length of time to extend service to both new and existing locations of 1 day. The Company stated that the reason new service extensions took only one day to complete in 2012 was due to the fact that all 5 new service requests were for service lines "installed congruent with the main line."

The Department will continue to monitor this metric for emerging patterns or trends in future reports and will provide future recommendations as necessary.

E. CUSTOMER DEPOSITS

This Report marks the second time that Greater Minnesota has provided data regarding this reporting requirement. The Company stated that it collected 3 customer deposits as a condition of receiving service during the 2012 calendar year. No deposits were collected in 2011. The Department will continue to monitor this reporting requirement in future reports.

The Commission's March 6 *Order* requires Minnesota's natural gas utilities "to 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 reported number of 'required customer deposits.'" The Company did not include this explanation; however the Department assumes that the total number of deposits held by GMG is 3, and that all 3 were newly required in 2013. The Department reminds GMG to provide this information in future reports

F. CUSTOMER COMPLAINTS

The Commission's 09-409 *Order* requires Minnesota gas utilities to provide customer complaint data in the same manner as prescribed in Minnesota Rule 7826.2000. The Company provided, as an attachment to its Report, these customer complaint data per Minnesota Rules. The Department notes that this is the second year that the Company has provided these data in its service quality reports.

In terms of total complaints, GMG reported 6 during calendar year 2012, 4 less than the 10 complaints reported for 2011. Greater Minnesota stated that it only reported complaints that were escalated to a supervisor for response. The Department notes that the other utilities' complaint data reflect all complaints received.⁴ Given this, the Department requests that Greater Minnesota clarify and explain, in its *Reply Comments*, how it determines and classifies complaints and whether the Company is able to provide complete complaint data.

The Company also provided data on whether complaints were forwarded from another party, such as the Commission's Consumer Affairs Office (CAO). Greater Minnesota reported that 1 complaint was received from the CAO in 2012; no CAO complaints were received in 2011.

The Company provided information on how many complaints were resolved by taking the customer's requested action, by reaching a mutually agreeable compromise, by explaining that the problem was out of utility control, and by refusing to take action. In 2012, 3 complaints were

⁴ Prior to the 2012 service quality report, Great Plains Natural Gas Company also provided customer complaint data reflecting only escalated complaints; Great Plains Natural Gas Company's 2012 report reflects all complaints consistent with the other natural gas utilities' reports.

resolved by taking the customer suggested action and the other 3 were resolved by reaching a mutually agreeable compromise.

Greater Minnesota reports customer complaints by complaint type. In 2012, GMG received 2 billing error complaints, 1 inaccurate metering complaint, 2 inadequate service complaints, and 1 complaint regarding service restoration intervals.

G. EMERGENCY LINE ANSWER TIMES

In its March 6 *Order*, the Commission required Greater Minnesota to track and report the total number of gas emergency calls received during each annual reporting period. The 2012 Report is the second report in which this data was collected and reported.

GMG stated that, as 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. The Company reported a total of 100 emergency calls received in 2012, a decrease from the 126 received in 2011. The Department will continue to monitor this reporting metric.

H. MISLOCATES

The Commission's March 6 *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. The Company reported 6 mislocates in 2012; the Company reported 5 mislocates in 2011. GMG received 5,807 locate requests in 2012 for a total mislocate rate of 0.1 percent. The mislocate rate for 2011 was 0.05 percent.⁵ While the mislocate rate did rise between 2011 and 2012, there is insufficient data available to indicate a trend. The Department will continue to monitor this metric in future annual service reports.

I. DAMAGED GAS LINES

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 the Minnesota Office of Pipeline Safety (MnOPS). This Report marks the third year that the Company has provided data regarding this reporting requirement. In its *Comments* in the 2010 *Annual Service Quality Report*, the Department requested that Greater Minnesota provide a more detailed breakdown of particular damage events such that they better align with information provided by other utilities. The Department notes that Greater Minnesota provided a more detailed breakdown of gas line damage events in the 2011 Report and again in the 2012 Report.

⁵ The Company did not provide the total number of locate requests for 2011 in that year's report.

Greater Minnesota reported seven gas line damage events in 2012, which is one less than the eight events reported in 2011 and two greater than the five events reported in 2011. Of the seven events, three were the result of a party not requesting a locate, three were caused by excavation equipment (where the line had been properly marked), and one was the result of a mismarked line.

The Company reported a decrease in gas line damage in 2012 compared to 2011, though the number of events is relatively similar between all three years of available data. The Department will continue to monitor this metric in future service quality reports.

J. SERVICE INTERRUPTIONS

In its 09-409 *Order*, the Commission required Greater Minnesota to collect and report data regarding service interruptions. GMG is required to separate these data into categories based on whether the event was caused by utility employees, utility contractors, or some other unplanned causes.

Greater Minnesota reported seven gas service interruptions during 2012, which is the same as the number of gas system damage events noted above. GMG reported that 3 of the 7 interruptions were caused by Company employees or contractors. The Company reported one fewer interruption in 2012 than in 2011, when there were eight interruptions. In its Report, the Company stated that two interruptions were due to Greater Minnesota mislocates, one was caused by an installation contractor (GMG contractor), and four resulted from unplanned causes. The Department will continue to monitor these data in future service quality reports and will make any relevant conclusions once a sufficient amount of data is available.

K. MNOPS REPORTABLE EVENTS

The 09-409 *Order* also required Greater Minnesota to provide summaries of all major events that are immediately reportable to the Minnesota Office of Pipeline Safety (MnOPS) and provide contemporaneous reporting of these events to both the Commission and Department when they occur.

The Company began providing this information starting with its calendar year 2011 annual report, reporting 0 reportable events in 2011 and 1 reportable event in 2012. The Company provided a brief summary of the reportable event in its Report. The Department commends Greater Minnesota on its low levels of MnOPS reportable events and will continue to monitor this metric in future reports.

L. GAS EMERGENCY RESPONSE TIMES

The Company stated that it provided two metrics in this Report: (1) the amount of time between the emergency call and the point at which the technician was dispatched; and (2) the elapsed time between the point of dispatch and the time that a qualified emergency response person arrived at the incident location to make the area safe.

In terms of emergency response intervals, Greater Minnesota reported that 81 of the 100 (81 percent) total calls received in 2012 were responded to in less than an hour. In its *Comments* on GMG's 2011 report, the Department requested that the Company explain why, in 2011, 10 percent of emergency calls were not responded to within an hour. The Company responded in *Reply Comments* by listing the reasons that calls were responded to in more than an hour, with all but two of these incidences concerning calls that were determined to not be emergencies. In the 2012 report, the Company provided this information in its initial filing, which the Department appreciates. Of the 19 calls responded to in over an hour in 2012, 16 were for a faint outdoor odor and not treated as emergencies, 1 was for carbon monoxide, which the Company cannot address without the assistance of an outside contractor (to repair appliances), and two were "unfounded" with no gas present. The Department will continue to monitor this criterion in future reports.

M. CUSTOMER SERVICE RELATED OPERATIONS AND MAINTENANCE EXPENSES

The Commission requires each gas utility to provide data regarding customer-service related operations and maintenance (O&M) expenses recorded in FERC Accounts 901 and 903. This Report is the second time that the Company has provided data regarding this reporting requirement. The Company provided annual costs. Greater Minnesota reported total customer service expenses in 2012 of \$84,348.70, which averages to \$7,029 per month. In 2011 GMG reported O&M expenses of \$87,646, which results in a monthly average amount of approximately \$7,304. The Department notes that O&M expenses decreased 3.8 percent from 2011 to 2012. The Department will continue to monitor this metric and will offer further comments as appropriate.

III. SUMMARY AND CONCLUSIONS

Based on its review of GMG's 2012 *Annual Service Quality Report*, the Department recommends that the Commission accept the Company's Report pending the provision of additional information required by the Commission's March 6 *Order* and responses to various inquiries in *Reply Comments*. The Department requests that the Company provide the following in *Reply Comments*:

- a full explanation of why the percentage of meters read by utility personnel decreased from 2011 to 2012;
- an explanation of why the level of involuntary disconnects significantly increased in 2012; and
- clarification and/or explanation of how complaints are determined and classified by call center personnel and of whether the Company is able to provide complete complaint data.

/ja

Natural Gas Service Quality Reporting Workgroup
Reporting Summary and Changes

	Xcel Energy	CPE	MERC	IPL	GP
Call Center Answer Times	<p>Changes: None. Already include IVR and billing calls.</p> <p>Our report includes E&G residential calls to our call center representatives, business solutions center calls to our rep, credit calls, and IVR handled outage and billing calls. We report monthly volume and percentages based on the 80/20 Rule. We report calls 24/7.</p>	<p>Changes: Eff with 2012 reports will add Service Level with IVR to Schedule 1.</p> <p>Schedule 1: The percent of calls answered within 20 seconds or less during stated business hours, the average speed of answer and the total number of calls answered. Includes utility call center, emergency calls, and business customer hotline. ASA and total number of calls answered are reported as required in Docket G008/G3-04-201. Excludes calls that only utilized IVR functionality.</p>	<p>Changes: Eff with 2012 report, will add IVR calls to the telephone response information.</p> <p>Our report includes monthly information for calls taken Monday through Friday, 8-5, the report includes average speed of answer and % of calls answered in 20 seconds or less. We also provide the similar information for calls coming into our emergency lines with the exception of the % answered in 15 seconds or less and is all calls taking 24/7. Does not include IVR calls.</p>	<p>Changes: None. Already includes IVR and all calls.</p> <p>Percentage of calls answered within 20 seconds including both gas and electric data. Includes all calls 24/7, including IVR.</p>	<p>Changes: None. Already include IVR calls.</p> <p>Total calls answered, percentage of calls answered in 20 seconds or less, and the average speed of answer. Includes calls during business hours (7 am to 7 pm) and includes IVR calls.</p>
Able to include IVR calls in Telephone Response Metrics	<p>We do include IVR handled outage and billing calls</p>	<p>We will add SL with the IVR included for Bill/Credit/Move (CIC - Residential) reporting to Schedule 1 beginning with January 2012.</p>	<p>MERC is able to include the number of IVR calls in the telephone response information.</p>	<p>Will continue to include</p>	<p>Will continue to include.</p>
Customer Deposits	<p>N/A</p> <p>Our reported deposits are from residential customers that have filed for bankruptcy (both E&G)</p>	<p>Schedule 5: The number of more orders and the number and percentage of deposits required for reconnection of service, including deposits required for reconnection of service after disconnection due to credit issues.</p>	<p>N/A</p> <p>Our report includes any deposits collected for the reporting year. We only collect from customers caught diverting (theft) service.</p>	<p>N/A</p> <p>Deposit data is for new and recontacting customers, consisting of both gas and electric data.</p>	<p>N/A</p> <p>Deposits required as a condition for receiving new service.</p>
Customer Complaints	<p>Changes: Eff with 2012 reports submit May 1 Complaint report.</p> <p>Customer advocate group- we report all complaints, source of complaint, type, and action we took and time to resolve by month.</p> <p>Call center- all calls that come into call center by residential type (complaint type), and action we took. By month- Both E&G</p>	<p>Changes: None. Already includes the May 1 Complaint report.</p> <p>Schedule 6: Number of recorded residential and commercial complaints, reason/type of complaint, action taken, time to resolve complaint and number of complaints resolved forwarded by outside agencies.</p>	<p>Changes: None. Already includes the May 1 Complaint report.</p> <p>Our report categorize complaints by the following types, employee action/behavior, billing/meter reading issue, collection/disconnection issues, service quality, meter adjustment, outage, high bill. We then report time to resolve. This is broken into 2 categories, initially, within 10 days and > 10 days. We then report report complaint resolution by the following, taking action as customer requested, agreeable compromise, not within the control of the utility and refuse customer request. We also indicate the # of PUC complaints. This is all reported on a monthly basis.</p>	<p>Changes: Eff with 2012 report, will include the May 1 Complaint Report.</p> <p>All customer complaints are tabulated. Data includes both gas and electric complaints.</p>	<p>Changes: Eff with 2012 report, will include the May 1 Complaint Report. Eff with 2013 report, will include all calls received in the customer service center summarized by call type.</p> <p>Customer complaints that are escalated to a supervisor response. Complaints are reported by type, resolution timeframe, resolution type, and number forwarded by the MN CAO.</p>
Please describe how/what you report					

Xcel Energy	CPE	MERC	IPL	GP
<p>Customer advocate group- we report all complaints, source of complaint, type, and action we took and time to resolve- by month Call center- we report specific call codes that we previously determined could be indicative of a complaint, this ends up being the majority of calls- we then report the call center calls by customer type, call type, and action we took. By month- both E&G</p>	<p>AMB/BHP Issue: Any Budget Billing issue, do not understand, too high or too low, question how calculated Billing Errors: Bill print issues, adopted contract account errors, Landlord Agreement error Construction & Maintenance: Excess footage fees, out of season charges, frost burners, cost to add change, relocate meter, cost to change pressure, meter location, fee shields, barriers, atmospheric corrosion inspection (ACT) Credit Arrangements: GAP, Cannot afford/cannot pay, reasonably on time, defaulted arrangement, CWR arrangement, reconnect quote Disconnect: Non-Pay, GUI/M, Wrongful Disconnect, thought had arrangements, did not receive notice, disconnected during CWR, reconnect fees, payment methods, scheduling requirements Disputed Charges: Any dispute not involving an account currently in write off, Escrow, Investigation Bad Debt, landlord/tenant disputes, foreclosures, divorce, roommate situations, disputed debt transfer, basic fee on inactive meter, dates of service (move in or out) Employee: CSR Error, Employee Misconduct</p>	<p>MERC reports all calls which the call center CSR believes to be a complaint. MERC has retained the CSRs to record all complaints through an automated process. When the CSR first looks at any account there is a pop up window which asks if the call is a complaint. This question must be answered before the CSR moves on. MERC reports the total number of complaints, breaks down the complaints by 7 different types: this breakdown is given by total number and percentage of total complaints. MERC provides the total numbers that are resolved initially, within 10 days and greater than 10 days. Complaint resolution is reported by total number and percentage. The resolution categories include taking action as customer requested, agreeable compromise, not within the control of the utility and refuse to customer requested action. The report also indicates the number of PUC complaints. This is informational only as those complaints are included in the reported complaint numbers.</p>	<p>Billing Errors - All billing complaints except high bills, low bills, zero usage/consumption, adjusted bills. Inaccurate Metering - Field/engineering/construction/maintenance issues, meter reading issues. Wrongful Disconnect - Turn-off or disconnect error, collections issues. High Bills - High bills due to usage or weather, billing issues. Inadequate Service - Customer service issues such as poor service, long waits, delayed responses, lack of follow-up. New Service Connection Intervals - New service issues relating to field/engineering/construction/maintenance departments. Service Restoration Intervals - Outage issues relating to field/engineering/construction/maintenance departments. Payment Status - Late payment, incorrect payment amount, late payment penalty, missing payment, promise to make payment, returned payment fee. Turn-on - Issues with turn-on order for service, wrong data, not complete, not issues correctly, lack of customer contact. Meter Reading/Other - Meter reading issues such as no read/estimate/mis-read, read cycle, reader access, reader behavior, read some cycle. Payment Arrangement - Payment agreements - short and long-term, new defaults, multiple agreements, agreement disputes, promise to pay. Credit & Collections General - Bankruptcy, collection agency/bureau issues, customer assistance programs. Property Damage - Report of damage to customer property/equipment, claims, insurance questions, locates, construction, - line clearance, outages, weather. Tree Trimming - Issues with tree trimming - not notified, trimmed too much, trimmed too little, did not like way trimmed, trim cycle. Engineering, Construction, Maintenance Other - No call back, non-emergency safety issue, outages, periodic meter change, planned maintenance/outage, power quality, radio interference, street/security lights. Power Quality & Reliability - Outages, blocks, quality issues. Customer Payment Programs - Programs such as: Automatic Payment, Prepaid Billing, Western Union, Check/Free, Budget Billing, Customer Assistance programs. Non-Utility Billing - Bill details, Contribution Tax, Adder bill detail, disputes charges, disputes responsibility, finance charges. General Billing Questions/General Other - All other.</p>	<p>Effective with 2013 report; call codes determined to be indicative of a complaint which is expected to be the majority of all calls will be reported by customer type, call type, and action taken by month.</p>
<p>Provide description of what is being reported in the Complaint numbers.</p>	<p>High Bill: Customer initiated complaint regarding high usage (must be usage related, not simply high balance) Insurance Metering: Switched piping, incorrect pressure forces, misread, non-registrative meter. ERT/programming, meter change, estimated reads Collections/Inactive/Write-Off: Account sent to collections, any collection agency related complaint Landmark Service: Failure to accommodate customer expectations; hold times, not following through with promised actions Web/Customer Self-Service/TVR: Online Billing, My Account Online, Password locked, web issues, bill reminders, TVR, Spanish option, difficulty navigating Payment Issue: One Time Pay, encoding error, missing payment information, application, processing delay, refund checks, late fee/due date, Energy Assistance payment, Bank Pay issue Rate/Tariffs: Refund of Service, Instant Rates, franchise fees, taxes, basic charge, delivery charge</p>			

Natural Gas Service Quality Reporting Workgroup
 Reporting Summary and Changes

	Xcel Energy	CPE	MERC	IPL	GP
Provide description of what is being reported in the Complaint numbers (continued).		Security Deposit: Cannot afford, question calculation, not returned, interest Service Order Scheduling: Anything appointment related, wait time, appointment windows, scheduling policies, missed/late appointment Other: Legal Access, Postcard, Claims/Restoration, BP Verification, CIP, Marketing, Vehicle Operation Pinpoint: Any complaint involving transfers part of the Pinpoint initiative Decoupling/TBR: Any complaint remaining to the Inverted Block Rate (tiered pricing) and/or Decoupling			
Whether MERC should be required, in future annual reports, to further categorize the complaints included in the category "my bill is too high"	N/A	N/A	MERC is willing to look at trying to further categorize these types of complaints. It most cases these are customers who's perception is their bill may be too high based on various factors such as media reports of how gas costs (why does gas cost me \$100/Dth when the media is telling me it's only \$2.00), weather impact, etc. In most cases it is CWS taking time to explain what goes into a bill or that the weather wasn't actually as warm as the customer may think.	N/A	N/A
How MERC, in future annual reports, should report on escalated, informal complaints, including those received by the Commission's Consumer Affairs Office	N/A	N/A	MERC believes it is capturing all those complaints.	N/A	N/A
How Xcel, in future annual reports, should report on call center complaint resolution timeframes (Xcel did not include this information in its 2010 report).	The vast majority of our call center complaints/calls are resolved upon their initial inquiry. However, we are looking into capturing the timeframe for the small percent of remaining calls. While it seems redundant to file the same report in two different places, it would be helpful to parties, we do not oppose. The reports are different, one annual customer complaint report under 7820.0507 details the numbers resolved/unresolved as well as total customer numbers. The info provided in our SQ reports under 7820.2000 doesn't provide this info, but breaks it down into categories, sources, by month, time resolved, action taken etc.	N/A	N/A	N/A	N/A
Whether utilities should be required to file copies of their annual customer service reports (required under Minn. Rules, part 7820.0500), whether those requirements overlap with the information provided in the annual gas service quality reports, and how these requirements compare and are reconciled.		Schedule 17: Currently including a copy of the report filed, as required in Docket No. G008/GR-04-001.	This seems redundant and hopefully this can be reviewed and determined that the gas service quality fulfills this requirement.		Copy of report will be provided.

	Xcel Energy	CPE	MERC	IPL	GP
Meter Reading	<p>Change: Eff with 2012 report, all utilities will report MR reading levels by geographic location, whether MRs have other non-AMR responsibilities, and whether AMR is deployed in each reported geographic area.</p> <p>Under 7826.1400 we report # and % of meters read by XE and customers by month. We report # and % of meters read for 6-12 months and 12-months by month, and a classification for why they haven't been read for all customer classes. We also reporting staffing levels by work center in accordance with the Rule.</p> <p>We also note that our reported numbers of meters read and estimated under 7826.1400 do not add to 100 percent because the Rule includes only the number of meters estimated for 6 or more consecutive months. Any meters estimated for a single month, up to a total of five months, are not included in the reported numbers.</p> <p>We report both E&G</p>	<p>Change: Eff with 2012 report, will estimate special or non-MR meter readings. All utilities will report MR reading levels by geographic location, whether MRs have other non-AMR responsibilities, and whether AMR is deployed in each reported geographic area.</p> <p>Schedule 2: The number of residential, commercial and total number of meters to be read by month, the number of residential, commercial, total and percentage of meters read from actual meter readings by CPE presented, the number of residential, commercial total and percentage levels for the metro area and greater Minnesota. The number of residential, commercial, total and percentage of meters not read within 6-12 months and greater than 12 months.</p>	<p>Change: Eff with 2012 report, all utilities will report MR reading levels by geographic location, whether MRs have other non-AMR responsibilities, and whether AMR is deployed in each reported geographic area.</p> <p>MERC reports monthly total meters, meters company read and meters estimated or self-read. MERC is not able to differentiate between an estimate or a self-read. The percentage of company read and self-read is provided along with # and % of meters not read in a 6-12 month period and those not read > 12 months. Comments are also provided as to why meters were not read during those periods. Because of the number of farmstead customers MERC has we report both with and without farm taps included. Farm taps are required by tariff and contract to self-read their meters with the company being required to read them once annually. MERC also provides meter reading levels. MERC does not have dedicated meter readers in all areas of the State. MERC relies on labor reports and provides a FTE estimate based on hours spent reading meters.</p>	<p>Change: Eff with 2012 report, all utilities will report MR reading levels by geographic location, whether MRs have other non-AMR responsibilities, and whether AMR is deployed in each reported geographic area.</p> <p>We include unexplained in our total.</p>	<p>Change: Eff with 2012 report, all utilities will report MR reading levels by geographic location, whether MRs have other non-AMR responsibilities, and whether AMR is deployed in each reported geographic area.</p> <p>The number and percentage of meters read by utility personnel, self-read by customers, or estimated. Also the number and percentage of meters not read by utility personnel for periods of 6-12 months and longer than 12 months with description as to why. Also provide meter-reading staffing levels by area.</p>
<p>Describe how/what you report</p>	<p>The difference between the total number of meters and the number of meters read by the utility or its customer is unexplained meter.</p> <p>Yes</p>	<p>On the 2011 report, the meters and rebills were included in the counts of actual bills and estimated bills. For 2012, special or rebill meter readings will not be included in the reported Actual and Estimated meter read numbers.</p>	<p>Yes</p>	<p>Yes.</p>	<p>No.</p>
<p>Whether the utilities' data on the number of unreads and unexplained meter readings is consistent with the utilities' data on the number of estimated billings under Minn. Rules, part 7820.3400.</p>	<p>Yes - we believe we are in compliance with the Rules.</p>	<p>Change: None.</p>	<p>For informational purposes only, MERC believes this information can be included as currently reported. Comparison from company to company is difficult at best based on geography, AMR, etc.</p>	<p>For informational purposes only, MERC believes this information can be included as currently reported. Comparison from company to company is difficult at best based on geography, AMR, etc.</p>	<p>Currently reported by geographical area.</p>
<p>Development of a more accurate and comparable method of reporting meter reading staffing levels and whether it is relevant for meter-reading staffing levels to be reported by work center or geographical area.</p>	<p>We have an integrated meter reading workforce and AMR system. We currently report by work center in compliance with Rule 7826.1400 in our electric SQ report. We support maintaining this work center reporting consistent for both our gas & electric SQ reports.</p>	<p>Change: None.</p>	<p>Special or rebill meter readings are not included in the reported Actual and Estimated meter read numbers. As a point of reference, IPL only has 58 special bill customers.</p>	<p>Special or rebill meter readings are not included in the reported Actual and Estimated meter read numbers. As a point of reference, IPL only has 58 special bill customers.</p>	<p>No.</p>
<p>Are "special" / "rebill" reads included in reported Actual and Estimated meter read numbers?</p>	<p>No.</p>	<p>Change: None.</p>	<p>Change: Eff with 2012 report, all utilities will include a summary modeled after the 2011 CPE summary of Cold Weather Rule reports.</p>	<p>Change: Eff with 2012 report, all utilities will include a summary modeled after the 2011 CPE summary of Cold Weather Rule reports.</p>	<p>Change: Eff with 2012 report, all utilities will include a summary modeled after the 2011 CPE summary of Cold Weather Rule reports.</p>
Involuntary Service Disconnections					
<p>Please describe how/what you report</p>	<p>Consistent with Order point 2D of the 8/26/10 Order Docket No. G999/CI-09-409, we reference the CWR report that do not include any of the information in our gas report</p>	<p>Schedule 3: The month ending Minnesota Cold Rule Compliance Questionnaire in a human format by month with all months reported. (Copy Set 6).</p>	<p>MERC provides the monthly CWR Compliance Questionnaire that is filed monthly with the Commission.</p>	<p>Included a copy of monthly Cold Weather Rule reports included in appendices.</p>	<p>Number of customers who received disconnection notices, # that sought Cold Weather Rule protection, who were granted protection, and whose service was disconnected involuntarily (all data from Cold Weather monthly reports)</p>
<p>Whether to require utilities to include in their annual service quality reports copies of the information they submit under Minn. Stat. §§ 21.03.031 and 21.03.036 (and/or summaries of this information), and if so, in what format</p>	<p>This was addressed in the Commission's August 26, 2010 Order in Docket No. G999/CI-09-409, but we do not oppose providing.</p>	<p>The information is summarized into a monthly matrix rather than including copies of each individual report.</p>	<p>The filings are available so including them is not an issue.</p>	<p>Provided in 2011 report.</p>	<p>Effective with 2012 report, will provide a summary of the monthly Cold Weather reported data.</p>
<p>Separate out credit-related disconnections to report just non-credit-related? If not, include the # of disconnections as a way to approximate just non-credit-related disconnections.</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>IPL was able identify that 314 of the 6,704 reconnections reported in the 2011 report were credit related, leaving a total of 6,390 non-credit related reconnections.</p>	<p>N/A</p>

Natural Gas Service Quality Reporting Workgroup
Reporting Summary and Changes

	Xcel Energy	CPE	MERC	IPL	GP
Service Extension Request Response Times	<p>Change: None. Already excludes reconectors for non-payment. Connections to current customers are included in total connections.</p> <p>We report requests to service to new locations both complete of installations and average # of days to complete from the time the property is ready until the only people that classify in this group are served as we identify those reconectors for service upgrades or requests for new service. We classify them all together. This report is gas only.</p>	<p>Change: None. Already excludes reconectors for non-payment.</p> <p>Schedule 4. The number of commercial and residential service extensions, the average number of days to complete from the time the property is ready until installation in complete for new service requests (syndicates where prior service did not exist) and residential service (syndicates where service previously existed) excluding locked meters related to credit issues.</p>	<p>Change: None. Already excludes reconectors for non-payment.</p> <p>This report includes monthly information for new service requests for both residential and commercial service installations. It indicates the # of requests and the average time between requested date and installation. The report also includes the same information for requests where an existing service exists and the meter has been turned off for reasons other than non-payment (gas and electric data).</p>	<p>Change: EIP with 2012 report, will exclude reconectors associated with non-payment.</p> <p>Report includes monthly information for new service requests for residential and commercial service installations (gas only data). It indicates the # of requests and the average time between requested date and installation. The report also includes the same information for requests where an existing service exists and the meter has been turned off for reasons other than non-payment (gas and electric data).</p>	<p>Change: None. Already excludes reconectors for non-payment. Connections to current customers are included in total connections.</p> <p>The number of extensions and average days to complete for New Service (locations not previously served) and Reconnect Service (locations previously served).</p>
Please describe how/what you report	<p>Aside from those customers who had their meter locked due to credit (which the Commission said not to include in their 8/26/10 Order) We do report this, we have not (and can not) break them out from the new customers so our reporting combines them all into one group (both new and current customers).</p>	<p>Currently excluding.</p>	<p>This does seem like a waste of time. The reports have indicated that the utilities do a good job in getting service initiated in these instances. If delays were occurring on regular basis the Commission would be receiving complaints. I've seen nothing to indicate this has been an issue.</p>	<p>Will exclude reconectors associated with non-payment.</p> <p>Currently excluding.</p>	<p>GP provided days between receipt of service line application and date meter was installed. We do not have an efficient means of tracking days between requested meter installation date and actual install date. GP supports excluding this data from the reports -- no situational dependent.</p>
Whether utilities should be required to report the number of requests for service to previously served locations and the time required to complete these requests	<p>The Commission's August 26, 2010 Order in Docket No. G099/C1-09-409 said to not need to include this, so we have not.</p>	<p>Currently excluding.</p>	<p>Currently excluding.</p>	<p>Currently excluding.</p>	<p>Currently excluding.</p>
Mislocates	<p>Change: EIP with 2012 report, will follow the mislocate criteria provided by CPE.</p>	<p>Change: None.</p>	<p>Change: EIP with 2012 report, will follow the mislocate criteria provided by CPE.</p>	<p>Change: EIP with 2012 report, will separate unmarked v. non-marked items; will attempt to report mislocates using the CPE criteria; will provide gas-only mislocates.</p>	<p>Change: None. Reported in this fashion in 2011 report.</p>
Please describe how/what you report	<p>We define mislocates as a gas line that was damaged as a result of mismarking or failure to mark a line. We divide the number of mislocates by the number of locate tickets to get the mislocate rate.</p>	<p>Schedule 8: The number of mislocates due to mismarked line, failure to mark a line, total number of mislocates, total number of locate tickets and number of mislocates per 1000 locate tickets.</p>	<p>MERC reports monthly total locates, % of mislocates and the % of mislocates. This report would only include those mislocates resulting in damage as MERC has no other consistent means of tracking this information.</p>	<p>Total locate requests for both gas and electric, including number of gas lines damaged due to mismarked or failure to mark.</p> <p>IPL will separate out mismarked vs. not marked in the 2012 report.</p>	<p>The number of locate tickets requests received through the MN One Call system and the number of mislocates categorized as either due to a not marked line or a mis-marked line.</p>
Whether to require MERC, Xcel, Interstate, and Great Plains to provide the same level of underlying detail on the total number of mislocates (the number of mismarked lines and the number of failures to mark a line) that CenterPoint provided in its 2010 report.	<p>Yes, we can do this. It will be based on whether there was a point or not, which we understand is the same way CPE does it. Beginning in 2012 b/c of a new rule, MNOPS requires reports only for damages that result in a leak--so our service quality reporting will report more than our MNOPS reports.</p>	<p>N/A</p>	<p>With the very low number of mislocates I question the value of this information.</p>	<p>IPL can break out the mis-locates and failure to mark items, but will need to investigate further our ability to calculate an error rate as gas and electric locate tickets are not broken out separately. IPL will attempt to report mislocates using the CPE criteria in the 2012 report.</p>	<p>GP provided the split between lines not marked and mis-marked lines and will continue to do so.</p>
Assess whether can follow the Mislocate criteria provided by CPE	<p>Yes we can.</p>	<p>Determines whether a line is mismarked or failed to be marked. CPE performs an investigation on all gas damage while point locate pictures taken by the locator to determine where a line was marked, buried or not marked at all. If there are pictures in the area of the damage but they are not within the 24 inch tolerance zone, CPE determines the type of damage to be marked. If there are no pictures in the point locate pictures in the file of the damage CPE determines this root cause to be a failure to mark.</p>	<p>MERC photographs all line locates prior to excavations. If damage occurs MERC will go back to the locate record (assuming a locate was received) to verify if the locate was accurate. If it is determined the locate was accurate according to 24 inch tolerance the excavator will be billed. If it is determined MERC or its excavator mislocated the facility the information is then included in the mislocate report portion of the Service Quality report.</p>	<p>Great Plains investigates each damage to determine who is at fault either company or contractor locator also determines if locates are off or not located at all. Results are documented, but we do not take pictures of locates at this time.</p>	<p>GP provided the split between lines not marked and mis-marked lines and will continue to do so.</p>
Separate out the electric mislocates to get gas-only	<p>N/A. Only reports natural gas mislocates.</p>	<p>N/A</p>	<p>N/A</p>	<p>In 2011, IPL had five (5) gas mislocates/lines not marked that resulted in damage to gas facilities. In 2012 report, will report gas-only mislocates.</p>	<p>N/A</p>

Natural Gas Service Quality Reporting Workgroup
Reporting Summary and Changes

	Xcel Energy	CPE	MERC	IPL	GP
Gas System Damage	<p>Change: None. Order Pr. 5 of the Commission's Oct 11, 2012 Order in Docket No. G999/AA-10-0485 sets the requirements for reporting the lost gas implications associated with at-fault contractor main strikes.</p>	<p>Change: None. Order Pr. 5 of the Commission's Oct 11, 2012 Order in Docket No. G999/AA-10-0485 sets the requirements for reporting the lost gas implications associated with at-fault contractor main strikes.</p>	<p>Change: None. Order Pr. 5 of the Commission's Oct 11, 2012 Order in Docket No. G999/AA-10-0485 sets the requirements for reporting the lost gas implications associated with at-fault contractor main strikes.</p>	<p>Change: EA with 2012 report, will report gas damage by month. Order Pr. 5 of the Commission's Oct 11, 2012 Order in Docket No. G999/AA-10-0485 sets the requirements for reporting the lost gas implications associated with at-fault contractor main strikes.</p>	<p>Change: Will continue to provide in future annual reports the detail requested. Order Pr. 5 of the Commission's Oct 11, 2012 Order in Docket No. G999/AA-10-0485 sets the requirements for reporting the lost gas implications associated with at-fault contractor main strikes.</p>
Please describe how/what you report	<p>We report gas line damages on a monthly basis classified by whether they were damaged by XE and our contractors or other causes. We then provide our miles of main and the damage calculated per 100 miles of main.</p>	<p>Schedule 9; Damages by CPE Employees/Contractors, Damages by other, total damages, miles of pipe, damages per 100 miles of pipe.</p>	<p>MERC reports on a monthly basis the total number of gas line damages and whether they were the fault of MERC or it's contractors, damaged by others or a system integrity failure.</p>	<p>Number of gas systems damaged, including whether the damage was caused by those working on behalf of the utility and also what the damage is attributed to (power equipment, hand digging, strikes, etc)</p>	<p>The number of gas system damages, categorized as to whether the damage was caused by a GP employee/contractor or caused by any other unplanned cause. Also included is miles of pipe and damage per 100 miles of pipe calculation.</p>
Whether to require Interstate to report in future annual reports its gas damage data by month.	N/A	N/A	N/A	IPL will report gas damage by month in the 2012 report.	N/A
Whether to require Great Plains and Greater Minnesota Gas to include in future annual reports data on the type of party (third-party contractor, utility personnel, customer) who caused each particular damage event.	N/A	N/A	N/A	N/A	GP will provide the detail requested in the 2012 report.
How the utilities account for lost gas when there is an incident of any kind that results in lost gas who pays for the cost of repairing damaged lines when the damage is not caused by the company or its contractor, as well as when the damage is caused by the company.	<p>Lost gas reporting set in Docket No. G999/AA-10-0485. Amount received from contractor damage bills are in offset to O&M expenses.</p>	<p>Lost gas reporting set in Docket No. G999/AA-10-0485. Contractors billed for cost of repairs. Amounts received from contractors is an offset to O&M expenses.</p>	<p>Lost gas reporting set in Docket No. G999/AA-10-0485. All fault causes are billed for damages. Amounts received are an offset to O&M expenses.</p>	<p>Lost gas reporting set in Docket No. G999/AA-10-0485. Excavator is billed for cost of repairs. Amounts received are an offset to O&M expenses.</p>	<p>Lost gas reporting set in Docket No. G999/AA-10-0485. All at-fault contractors are billed for damages. Amounts received are an offset to O&M expenses.</p>
Gas Service Interruptions	<p>Change: None.</p>	<p>Change: None.</p>	<p>Change: EIT with 2012 report, will provide tabulated outage times.</p>	<p>Change: EIT with 2012 report, will provide calculated outage times.</p>	<p>Change: None.</p>
Please describe how/what you report	<p>We report gas service interruptions on a monthly basis classified by whether they were damaged by XE and our contractors or other causes. Unlike those categories we include the number of homes, the number of incidents, and the average outage time.</p>	<p>Schedule 10; Report outages due to CPE Employees/Contractors, outages due to others and total outages, and the average duration of the outage. Also provide in Schedule 11 detail of MNO/PS reportable events and system integrity events.</p>	<p>MERC provides monthly information of total service interruptions, and whether they were caused by a MERC employee or contractor, other or system integrity. A monthly detailed report is also included indicating the duration of the interruption.</p>	<p>Reported all gas service interruptions, including the numbers of customer affected.</p>	<p>All gas service interruptions, including the number of customers affected and the average duration of the outage, categorized according to whether the interruption was caused by a GP employee/contractor or by any other unplanned cause.</p>
Whether Xcel should continue providing gas service interruption information in the five categories used for October through December 2010.	Already changed in 2011 report	N/A	N/A	N/A	N/A
Whether Xcel should be required to summarize its gas service interruption data using the two categories of gas service interruption as required and used by the other companies. These two categories are: (1) customer outages due to Xcel employee or Xcel contractor and (2) customer outages due to any other unplanned cause. Or whether this information should be reconciled with the more detailed, five-category reporting method Xcel currently uses.	Already changed in 2011 report	N/A	N/A	N/A	N/A
Service Interruptions & Integrity Events - Deflex calculations for Average Outage Time and Total Outage Time	<p>The start of the outage is when it's used in our system that the gas is off; if that is not noted, we use the create time of the order. The end of the outage is when it's noted that gas is on; if that is not noted, we use or the completion time of the order. The total outage time is the time for all the outages of that time period. The average outage is the total outage time divided by the number of homes affected.</p>	<p>CPE calculates the average duration for monthly outages by taking the total outage time for the month and dividing that by the number of customers lost.</p>	<p>MERC has not provided an average for outage times. MERC is willing to provide this in future Service Quality filings. MERC calculates total outage time as beginning when the outage is reported and completed when service is restored to the last affected customer.</p>	<p>IPL has not previously reported statistics related to outage times.</p>	<p>Total outage time is the time from notification of the outage until service is restored to the last customer. Average outage time equals the total outage minutes divided by the total customers out of service.</p>

Natural Gas Service Quality Reporting Workgroup
Reporting Summary and Changes

Gas Emergency Answer Times	Xcel Energy	CPE	MERC	IPL	GP
<p>Change: EIR with 2012 report, include internal performance goal for answering gas emergency calls (X percent in 4 seconds).</p> <p>We report calls from our MN customers either directly to our Gas Emergency line or to one of our other customer service numbers where the customer selected the option for a gas emergency- we report the monthly number of gas emergency calls as well as the average speed of answer for those calls.</p>	<p>Schedule 7: The percent of calls received on our published emergency line answered 24x7 within 20 seconds, the average speed of answer and the total number of calls answered. This line may also receive calls other than emergency calls. ASA and total number of calls answered are reported as originally required in Docket G008/GR-04-901.</p>	<p>Change: EIR with 2012 report, include internal performance goal for answering gas emergency calls (X percent in 4 seconds).</p> <p>MERC provides the monthly total calls received, average speed of answer and % answered in 15 seconds or less. MERC also provides the tech response time from initial call to arrival for all emergency calls. The numbers are categorized by < 1 hour or > 1 hour. MERC also breaks this information down by service region as requested by the Department. MERC provides the monthly average response time with its goal of having an average response time of 30 minutes or less.</p>	<p>Change: EIR with 2012 report, include internal performance goal for answering gas emergency calls (X percent in 4 seconds).</p> <p>Both gas and electric callers who respond "Yes" to the initial interactive voice response question "Is this a life threatening emergency, such as a downed wire or gas odor?"</p>	<p>Change: EIR with 2012 report, include internal performance goal for answering gas emergency calls (X percent in 4 seconds).</p>	<p>Change: EIR with 2012 report, include internal performance goal for answering gas emergency calls (X percent in 4 seconds).</p> <p>Total calls answered, percentage of calls answered in 20 seconds or less, and the average speed of answer.</p>
<p>Whether to require Xcel to include in its future annual service quality reports the number of gas emergency calls in addition to the average answer time for these calls.</p>	<p>Already included in 2011 report</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>
<p>Whether to require the gas utilities to include in their annual reports their goals (internal performance metric) for answering gas emergency calls in terms of the percentage of calls answered within XX seconds</p>	<p>Internal goal is 80/20, though we place a priority on gas emergency calls.</p>	<p>Overall goal of answering 80% of calls within 20 seconds annually for all types of calls.</p>	<p>MERC already provides this information.</p>	<p>We strive to meet the goal of 80%.</p>	<p>Internal goal is 80/20, with a priority placed on gas emergency calls.</p>
<p>Gas Emergency Response Times</p>	<p>Change: EIR with 2012 report, will provide MnOPS reports.</p> <p>We report all gas emergency calls, the count, the answer and talk time, the dispatch/enroute time, travel time, and when the total response time, as well as all averages and % of calls responded to under and over 60 minutes. Our gas emergency calls classifications are: Non-life gas explosion, fire, carbon monoxide with and without symptoms, dead regulator, small gas inside, small gas outside, no gas, and high or low pressure)</p>	<p>Change: None. Already provides MnOPS reports.</p> <p>Schedule 12: The reporting metric is the time from the initial notification to the time that a qualified emergency response person arrives at the incident location for purposes of making the area safe. Emergency response times are reported by metro and outstate as calls responded to in one hour or less and calls responded to in over one hour. CenterPoint Energy provides number and percentage of emergencies responded to within one hour and within more than one hour. CenterPoint also provides the average number of minutes it takes to respond to an emergency. This same information, in such, is reported in the Emergency Response Report to the Minnesota Office of Population Safety (MnOPS).</p>	<p>Change: EIR with 2012 report, will provide MnOPS reports.</p> <p>MERC provides the tech response time from initial call to arrival for all emergency calls. The numbers are categorized by < 1 hour or > 1 hour. MERC also breaks this information down by service region as requested by the Department. MERC provides the monthly average response time with its goal of having an average response time of 30 minutes or less.</p>	<p>Change: EIR with 2012 report, will provide MnOPS reports.</p> <p>Any call coded as a gas emergency (CO, fire, line hit, odor) will be included in PUC submittals.</p>	<p>Change: EIR with 2012 report, will include an average emergency response time calculation.</p> <p>Emergency response calls categorized by calls responded to in 1 hour or less and calls responded to in over 1 hour. Also report the average response time in minutes.</p>
<p>Please describe how/what you report to the PUC</p>	<p>We report five more types of calls in our gas QSP reports than we do in our MnOPS reports based on MnOPS preference (we do not report on any types of carbon monoxide calls, we know on regulator, no gas, and high/low pressure gas to MnOPS).</p>	<p>Provide Monthly required reporting as specified by MnOPS and is duplicated in our PUC report.</p>	<p>Same as above</p>	<p>Any call coded as a gas emergency (CO, fire, line hit, odor) will be included in MnOPS submittals.</p>	<p>Same information is reported to MnOPS on the monthly Emergency Response Reporting Form.</p>
<p>Please describe how/what you report to MnOPS</p>	<p>We report the following call types: blowing gas, explosion, fire, smells gas inside, smells gas outside</p>	<p>The orders that make up this report include all calls received from customers, contractors, passer-bys, 911 dispatchers, or company personnel relating to gas odors, gas leaks, indications of high pressure, fires, incidents, hit gas lines (either inside or outside).</p>	<p>MERC files 2 annual reports with MnOPS. One report provides emergency call response in 1 hour or less and those over 1 hour. This report is for all gas leak calls and does not include those that specifically state it is a carbon monoxide call. The other report, Annual Utility Damage Report form, provides the total number of locate requests, total number of damages and the cause for those reported damages. There are 11 categories for the cause for damage.</p>	<p>FP7 codes the following issues as emergency calls: Carbon Monoxide, Fire, Line Hit, and Odor.</p>	<p>GP reports fire, explosion, line hits, and other calls.</p>
<p>Define call types included in MnOPS Reports</p>					

Natural Gas Service Quality Reporting Workgroup
Reporting Summary and Changes

	Xcel Energy	CPE	MERC	IPL	GP
Highlight any differences between MnOps Reports and MPUC reported items.	See above. We report five more types of calls in our gas QSP reports than we do in our MnOps reports, based on MnOps preferences	We report the same items.	In the MPUC report MERC provides the % of calls answered in < 1 hour and > 1 hour and the average response time. For MnOps reports the total number of failures same as the MnOps report but does not have as many cause reasons. The MPUC has only 3 categories, system integrity, fault of MERC, or its contractors and other	None. Any call that is coded as an emergency will be included in the statistical reports submitted both to the Commission and MNOPS.	Great Plains was directed to report all gas service interruptions regardless of qualifying as reportable to MnOps in Docket No. G004/M-11-363.
Whether to require Great Plains to provide, in future annual reports, an average response time calculation for all gas emergency responses.	N/A	N/A	N/A	N/A	GP will provide this information in the 2012 report.
Whether to require the gas utilities to provide, in future annual reports, complete and non-redacted copies of their MnOps Emergency Response Reporting Forms.	Already included in 2011 report	Currently providing monthly Emergency Response Forms	Only if it eliminates the need to report the same information in the emergency response since in the quality report.	Not an issue to provide this. Will include in the 2012 report.	GP attaches the complete and non-redacted copies of the MnOps form to its Service Quality Report.
Whether to require the gas utilities to provide, in future annual reports, reconciliations between the gas emergency response numbers reported in their annual service quality reports and the numbers reported to MnOps in the MnOps Emergency Response Reporting Forms	It is not possible to reconcile the existing service quality and MnOps reports due to the breakdown of the categories for each due to how the 2 reports require different classifications and the differing esj's per start/stop of the QSP v. MnOps forms.	Currently using MnOps reports to complete Service quality reporting.	No opinion either way.	These numbers should be the same and could be provided.	GP reports the same information
Consider input from the Department on review of these reconciliations, including whether the utilities are accurately reporting their gas emergency response times and reporting data using the correct gas emergency response time metric.	As part of the Working Group, it was determined that all utilities will provide MnOps reports for their annual reports, so no reconciliation is necessary. The Xcel QSP report will additionally be provided as additional reporting that provides an alternative view of its emergency response (as summarized above).	As part of the Working Group, it was determined that all utilities will provide MnOps reports for their annual reports, so no reconciliation is necessary.	As part of the Working Group, it was determined that all utilities will provide MnOps reports for their annual reports, so no reconciliation is necessary.	As part of the Working Group, it was determined that all utilities will provide MnOps reports for their annual reports, so no reconciliation is necessary.	As part of the Working Group, it was determined that all utilities will provide MnOps reports for their annual reports, so no reconciliation is necessary.
Major Incident Reporting	Change: Full with 2012 report will provide a summary of compensations request rather than each professional email.	Change: None	Change: None	Change: None	Change: None
Please describe how/when you report	Similar to our electric reports, we provide a copy of every email sent to the CAO and the individual summary of the notification that was attached to it.	Provides a summary of all notifications from the year.	Provides a summary of all notifications from the year.	Provides a summary of all notifications from the year.	Provides a summary of all notifications from the year.
Customer Service Related O&M Expenses	Change: None	Change: None	Change: None	Change: None	Change: None
Please describe how/when you report	We provide the customer service related O&M expenses included in FERC accounts 901 and 903 plus payroll taxes and benefits both for NSEFM (which includes MN, ND and SD operations) as well as the state of MN	Schedule 13 includes FERC accounts 901 and 903 plus payroll taxes and benefits.	MERC reports all expenses associated with FERC accounts 901 and 903 plus payroll taxes and benefits.	Costs related to FERC accounts 901 and 903, including payroll taxes and benefits.	The costs recorded in FERC accounts 901 and 903, plus payroll taxes and benefits.
Additional Service Quality Reporting					
Please describe any additional information included in annual service quality reporting	QSP Tariff annual Gas Emergency Response report.	Schedule 14 Suez service line relocation cost, as ordered in Docket G008/M-09-1190	N/A	N/A	N/A
Please describe any additional information included in annual service quality reporting	N/A	Schedule 15, Meters at 630 or Greater Cost, as ordered in Docket G008/M-09-1190	N/A	N/A	N/A
Please describe any additional information included in annual service quality reporting	N/A	Schedule 16, Calls Received from Dedicated Lines, as ordered in Docket G008/GR-04-901	N/A	N/A	N/A
Docket Numbers	2002-2011 - E-G003/CI-02-2034 2003 - E-G002/M-09-58 2009 - G002/M-09-841 (SQ TARIFF AMENDMENTS) 2010 - E-G002/CI-10-69 (TARIFF MODIFICATION) 2011 - G002/M-11-360 2012 - G002/M-12-440	2004 - G-008/GR-04-901 2005 - G-008/GR-04-901 2006 - G-008/M-06-1483 2007 - G-008/M-07-1641 2008 - G-008/M-08-396 2009 - G-008/M-09-390 & G-999/CI-09-409 2010 - G-008/M-10-378 2011 - G-008/M-10-374 2012 - G-008/M-12-425	2003 - G007/01/CI-02-1369 2004 - G007/01/CI-02-1369 2005 - G007/01/CI-02-1369 2006 - G007/01/CI-02-1369 2007 - G007/01/CI-02-1642 2008 - G007/01/CI-08-397 2009 - G007/01/CI-09-488 2010 - G007/01/CI-10-374 2011 - G007/01/CI-12-436	2010 - G-999/M-11-361 2011 - G-999/M-12-411	2009 - G-999 / CI-09-409 2011 - G004/M-11-363 2012 - G004/M-12-442

Note: The focus of the workgroup was to identify methods for increasing uniformity in reporting among the gas utilities, making the annual comparisons of data for each utility easier, as well as more useful in assessing the reports and in setting any future reporting requirements.

AGENDA
Natural Gas Service Quality
Utility Stakeholder Group

Meeting date: June 22, 2012

Follow-up Actions

(Provide identified information/responses to Xcel Energy)

Who	What	When
All Utilities	Provide to-date SQ Dockets	Jun 29
	<u>Service Interrupts & Integrity Events:</u> Define calculations for Average Outage Time and Total Outage Time	Jul 13
	Define call types included in MnOps Reports	Jul 13
	Highlight any differences between MnOps Reports and MPUC reported items	Jul 13
	Assess whether can follow the Mislocate criteria provided by CPE (see below)	Jul 13
	Provide description of what is being reported in the Complaint numbers.	Jul 13
CPE	Provide Summary of Cold Weather Rule reporting of involuntary service disconnects	Jun 29
	Provide criteria for when require a Deposit	Jul 13
	Are "special"/ "rebill" reads included in reported Actual and Estimated meter read numbers?	Jul 13
	Provide to attendees, criteria for Mislocate classification	Jun 29
	Include IVR calls in Telephone Response metrics?	Jul 13
IPL	Are "special"/ "rebill" reads included in reported Actual and Estimated meter read numbers?	Jul 13
	<u>Service Connect/Reconnect</u> Separate out credit-related reconnects to report just non-credit-related? If not, include the # of disconnects as a way to approximate just non-credit-related disconnects.	Jul 13
	Separate out the electric Mislocates to get gas-only?	Jul 13
MERC	Include IVR calls in Telephone Response metrics?	Jul 13
GP	<u>Service Connect/Reconnect</u> Separate out credit-related reconnects to report just non-credit-related? If not, include the # of disconnects as a way to approximate just non-credit-related disconnects.	Jul 13

AGENDA
Natural Gas Service Quality
Utility Stakeholder Group

Recommendations/Decisions

- The workgroup output will be a completed all-utility matrix of the “current state” reporting that additionally includes:
 - Metric reporting definitions;
 - Any go-forward reporting modifications that will achieve or improve reporting consistency across the utilities; and,
 - The effective date of noted reporting changes.

In Go-Forward Annual Reports:

- Include the May 1 Compliant report that is required by Minn. R. 7820.0500.
- Meter Reading Staffing Levels:
 - Report by geographic location;
 - Include text re; whether Meter Readers have other/non-meter reading responsibilities; and,
 - Indicate whether AMR is deployed in each reported area.
- Involuntary Service Disconnects: Include a summary modeled after the 2011 CPE summary of Cold Weather Rule reports.
- Lost Gas: Include a statement that provides a “tie” to the lost gas related to system damages issue that is going on in the AAA Docket(s).
- Provide MnOps event reports.
- Provide a summary of contemporaneously-reported events/incidents, rather than the actual email notifications sent at the time of the event.

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-13-362

Dated this 27th day of **June, 2013**

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_13-362_M-13-362
Bob	Emmers	bemmers@greatermngas.com	Greater Minnesota Gas, Inc.	202 South Main St. PO Box 68 Le Sueur, MN 56058	Electronic Service	No	OFF_SL_13-362_M-13-362
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_13-362_M-13-362
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_13-362_M-13-362
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_13-362_M-13-362
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_13-362_M-13-362
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_13-362_M-13-362
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_13-362_M-13-362