

September 23, 2025

Sasha Bergman  
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  
Docket No. G-004/M-25-32

Dear Ms. Bergman:

Attached are the comments of the Minnesota Department of Commerce (Department) in the following matter:

*In the Matter of Great Plains Natural Gas Co.'s 2024 Annual Gas Service  
Quality Report*

The Petition was filed by Great Plains on May 1, 2025.

The Department recommends that Great Plains file information in a reply comment before acceptance of the 2025 annual Gas Service quality Report. The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB  
Assistant Commissioner of Regulatory Analysis

DH/ad  
Attachment



## Before the Minnesota Public Utilities Commission

### Comments of the Minnesota Department of Commerce

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Docket No. G-004/M-25-32

#### I. INTRODUCTION

Great Plains filed its Annual Gas Service Quality Report (2024 Report or Annual Report) for 2024 on May 1, 2025 in compliance with the Commission's Orders and requirements from G002,G022,G004,G011,G008/CI-22-548.

The Minnesota Public Utilities Commission (Commission) established reporting requirements for natural gas local distribution companies regarding service quality and reliability in 2010 and has adjusted and increased the reporting requirements since that time. The Annual Report on Natural Gas Service Quality provides an overview on the utility's operational performance for the previous year.

#### II. PROCEDURAL BACKGROUND

February 2, 2024	Commission filed notice of comprehensive list of current gas service quality reporting requirements. <sup>1</sup>
December 26, 2024	Commission accepted all utilities 2023 gas service quality reports. Added reporting requirement related to service interruption. <sup>2</sup>
May 1, 2025	Great Plains filed its annual report for service year 2024. <sup>3</sup>
May 12, 2025	Commission filed notice of comment. <sup>4</sup>

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<sup>1</sup> *Notice of Gas Service Quality Reporting Requirements*, February 2, 2024, Docket No. G002,G022,G004,G011,G008/CI-22-548 (eDockets) [20242-203037-01](#) at 1 (hereinafter "2024 Universal GSQ").

<sup>2</sup> *In the Matter of Northern States Power Co. d/b/a Xcel Energy's, CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas', Great Plains Natural Gas Co.'s, Greater Minnesota Gas, Inc.'s, and Minnesota Energy Resources Corp.'s Service Quality Report*, , December 26, 2024, Docket No. G-004/M-24-32 (eDockets) [202412-213330-01](#) (hereinafter "2024 Order") at 1.

<sup>3</sup> Gas Service Quality Annual Report For the Calendar Year Ending December 31, 2024, Great Plains, May 1, 2025, Docket No. G-004/M-25-32 (eDockets) [20255-218503-01](#) (Hereinafter "Petition") at 1.

<sup>4</sup> *Notice of Comment Period*, May 12, 2025, Docket No. G-004/M-25-32 (eDockets) [20255-218822-01](#) (hereinafter "Notice of Comment") at 1.

Topics open for comment:

- Should the Commission accept Xcel Energy, Great Plains, CenterPoint Energy, Minnesota Energy Resources, and Greater Minnesota Gas' 2024 Annual Gas Service Quality Reports?
- Are there other issues or concerns related to this matter?

### III. DEPARTMENT ANALYSIS

The Department reviewed Great Plains' 2024 Report to assess compliance with the reporting requirements established by the Commission. The Department also used information from past annual reports to facilitate identification of issues and trends regarding Great Plains' performance. The Department responds to the questions in the Commission notice and provides a review of Great Plains' 2024 Annual Report to assess compliance with the reporting requirements established by the Commission.

#### A. RESPONSE TO COMMISSION QUESTIONS

- A.1. *Should the Commission accept Xcel Energy, Great Plains, CenterPoint Energy, Minnesota Energy Resources, and Greater Minnesota Gas' 2024 Annual Gas Service Quality Reports?*

The Department requests Great Plains file additional information in reply comments.

- A.2. *Are there other issues or concerns related to this matter?*

The Department has no other issues or concerns related to this matter.

#### B. REPORT ANALYSIS

- B.1. *Reporting Requirements*

On February 2, 2024, the Commission compiled requirements from previous orders in its Notice of Gas Service Quality Reporting Requirements to date in Docket No. 22-548.<sup>5</sup> The Notice includes the history of originating Commission orders.<sup>6</sup> For example, Docket No. 09-409 is cited for the requirement to report the percentage of phone calls to call centers that are answered within 20 seconds.<sup>7</sup>

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<sup>5</sup> 2024 Universal GSQ at 1.

<sup>6</sup> *Notice of Gas Service Quality Reporting Requirement*, February 2, 2024, Docket No. G002,G022,G004,G011,G008/CI-22-548 (eDockets) [20242-203037-01](#) (hereinafter "2024 Universal GSQ").

<sup>7</sup> *In the Matter of a Commission Investigation into Gas Utility Standards, Order Setting reporting Requirements*, January 18, 2011, Docket No. G-999/CI-09-409 (eDockets) [20111-58629-01](#) at 4.

The reporting requirements were updated on February 2, 2024, to incorporate more recent orders.<sup>8</sup> On December 26, 2024, the Commission further required reporting of the “number of customers whose service was interrupted, and the average duration of interruptions.”<sup>9</sup>

*B.2. Call Center Response Times*

Gas utilities are required by the Commission to report the percent of calls answered within 20 seconds and the average time to answer an incoming call.<sup>10</sup> The orders were similar to Minn. R. 7826.1200 for electric utilities which states that utilities shall answer 80% of calls during business hours within 20 seconds.<sup>11</sup>

**Table 1: Call Center Response Times for Great Plains (2015 – 2024).<sup>12</sup>**

Year	Avg Answer Speed (Seconds)	# of calls	Percent less than 20 seconds
2015	12	25,810	83%
2016	12	21,924	83%
2017	19	27,924	85%
2018	13	22,979	86%
2019	3	23,805	82%
2020	4	21,281	84%
2021	6	28,349	97%
2022	10	43,978	97%
2023	8	44,118	98%
<b>2024</b>	<b>7</b>	<b>39,232</b>	<b>99%</b>
<b>10-Year Average</b>	<b>9.4</b>	<b>29,940</b>	<b>89.%</b>

Table 1 above shows that Great Plains has consistently answered greater than 80% of its calls within 20 seconds. Great Plains reported a significant call volume increase in 2022, which the Company explained was the result of the new ability to track Interactive Voice Response (IVR) calls starting in mid-January 2022.<sup>13</sup> The 2024 call volume at 39,232 was comparable to the 2023 call volume of 43,978.

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<sup>8</sup> 2024 Universal Requirements at 1.

<sup>9</sup> 2024 Order at 1.

<sup>10</sup> 2024 Universal GSQ at 3 .

<sup>11</sup> [Minn. R. 7826.1200](#), subp. 2.

<sup>12</sup> Petition at 1 and Schedule 1.

<sup>13</sup> Gas Service Quality Annual Report For the Calendar Year Ending December 31, 2022, Great Plains, May 1, 2023, Docket No. G004/M-23-78 (eDockets) [20235-195483-01](#), at 2.

The Department concludes that the Company met the service quality standard and reporting requirements for call center data.

*B.3. Meter Reading Performance*

Great Plains and other utilities must annually report performance statistics on meter reading. The following information is required for reporting on meter-reading performance by customer class for each month:

- The number and percentage of customer meters read by utility personnel;
- The number and percentage of customer meters self-read by customers;
- The number and percentage of customer meters that have not been read by utility personnel for periods of six to 12 months and for period of longer than 12 months, and an explanation as to why they have not been read; and
- Data on monthly meter-reading staffing levels, by work center or geographical area.

Great Plains provided detailed meter-reading information, including information on its monthly meter-reading staffing levels. Table 2 summarizes Great Plains’ meter-reading statistics.<sup>14</sup>

Table 2: Meter-Reading Performance 2015 – 2024.<sup>15</sup>

	<b>Percent Read by Company</b>	<b>Percent Read by Customer</b>	<b>Average Number of Meter Reading Personnel</b>
2015	99.86%	0.07%	6
2016	99.97%	0.00%	3
2017	99.98%	0.00%	3
2018	99.98%	0.00%	3
2019	99.98%	0.00%	3
2020	99.99%	0.00%	3
2021	99.99%	0.00%	3
2022	99.98%	0.00%	3
2023	99.98%	0.00%	3
2024	99.99%	0.00%	3
<b>10-Year Average</b>	<b>99.97%</b>	<b>0.01%</b>	<b>3</b>

All Great Plains’ meters are equipped with automated meter reading (AMR), since 2022 and the AMR system read 99.99% of meter reads in 2024.<sup>16</sup> The remaining 0.01% of meter reads were estimated by

<sup>14</sup> 2024 Universal GSQ at 3. The standard is similar for electric utilities in [Minn. R. 7826.1400](#).

<sup>15</sup> Petition, at Schedule 2; 2024 GP GSQ at 3.

<sup>16</sup> Petition, at 1.

the system, when no meter data was retrievable by the fixed network system or handheld device. The Company was able to read all meters, and the customer consequently did not read any meters through the course of the year.

Meter-reading staffing was stable in 2024, with two meter-readers in the north geographical area, and one in the south.<sup>17</sup>

The Department concludes the Company met the meter reading reporting requirements for 2024.

*B.4. Involuntary Service Disconnection Data*

The Docket No. 22-548 required gas utilities to provide data on involuntary disconnections it reports under Minn. Stat. § 216B.091 and § 216B.096 (Cold Weather Rule reports) with its annual service quality report.

All Gas Utilities shall append their December Residential Customer Status Reports, including data for January through December as filed in Docket No. E,G-999/PR-YY-02, in their annual service quality reports. Gas Utilities shall also provide a narrative explanation of their involuntary service disconnection performance, as needed, including steps taken to improve performance in the future.<sup>18</sup>

The Department summarizes Great Plains’ residential customer disconnection statistics below.

Table 3: Residential Customer Involuntary Disconnect Information (2015-2024).<sup>19</sup>

	Received Disconnect Notice	CWR Protection			Disconnected Involuntarily	Restored within 24 Hours		Restored by Entering Payment Plan
		Sought	Granted	% Granted		Count	%	
2014	18,711	10	10	100%	1,227	34 <sup>10</sup>	2.77%	10
2015	8,432	18	18	100%	819	0	0%	18
2016	9,732	12	12	100%	649	0	0%	12
2017	9,375	16	16	100%	743	0	0%	16
2018	9,491	18	18	100%	836	0	0%	18
2019	9,337	43	43	100%	862	0	0%	43
2020 <sup>11</sup>	1,755	0	0	NA	0	0	NA	0
2021	2,831	14	14	100%	407	26	6.39%	16
2022	4,571	21	21	100%	481	48	8.26%	18
2023	4,215	19	19	100%	672	43	6.40%	43
2024	4,167	40	40	100%	598	48	8.02%	40
<b>10-Yr Avg</b>	7,511	19	19	100%	663	325	3.18%	21

<sup>17</sup> Petition, at Schedule 2.

<sup>18</sup> 2024 Universal GSQ at 3.

<sup>19</sup> Petition at 5 and Schedule 3.

In 2024, the Company sent 4,167 disconnection notices and disconnected 598 residential customers for non-payment. As shown in Table 3, Great Plains has consistently granted 100% of cold weather rule protection requests. Of those involuntarily disconnected 75.92 percent were eventually reconnected, either at the same address or elsewhere within Great Plains service territory. The average monthly number of customers who were still disconnected between 1-31 days was 37.83; and between 32-60 days was 32.67.

In 2014, the Company had an unusually high numbers of disconnect notices (18,711) and involuntary disconnections (1,227). Also, there was a disconnection moratorium during the early part of the COVID-19 pandemic, which led to the lower-than-average disconnection figures in 2020 and 2021. Since the 2020 moratorium the total number of disconnect notices sent to customers has dropped significantly, but more of the customers receiving those notices are ultimately being disconnected. The Department will continue to monitor disconnections. If the percentages continue or increase, the Department may choose to search for ways to reduce disconnections to lower percentages.

The Department concludes that the Company provided the required reporting for involuntary disconnections.

#### *B.5. Service Extension Requests*

The following information is required for reporting on service extension request response times by customer class and calendar month:

All Gas Utilities except GMG shall report, as described by Minn. Rules, part 7826.1600, items A and B:9

- The number of customers requesting a service extension by customer class.
  - The interval between the date service was installed and the latter of the customer-requested in-service date or the date the premises were ready for service.<sup>20</sup>

Specifically, Minn. R. 7826.1600 requires:

The annual service quality report must include a report on service extension request response times, including, for each customer class and each calendar month:

A. the number of customers requesting service to a location not previously served by the utility and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service; and

B. the number of customers requesting service to a location previously served by the utility, but not served at the time of the request, and the intervals between the date

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<sup>20</sup> 2024 Universal GSQ, at 4. Also, see [Minn. R. 7826.1600](#).

service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service.<sup>21</sup>

Additionally, utilities also shall report the types of extension requests, such as requests for reconnection after disconnection from nonpayment, for locations previously served and not previously served.<sup>22</sup>

Table 4 below summarizes Great Plains' 2023 service extension request data for new service extensions requests.

Table 4: 2024 New Service Extension Requests (2015 -- 2024).<sup>23</sup>

	Residential		Commercial	
	# of Installations	Avg Days to Complete	# of Installations	Avg Days to Complete
2014 – 2018 Avg	121	27.2	29	29.1
2019 – 2023 Avg	100	47.2	23	46.2
2023 Actual	73	54.8	25	65.2
2024 Actual	63	47.1	18	30.5

Overall, new service extension requests appear to have decreased over the years. Residential requests in 2024 equaled 63, which is a little more than half of the average annual number of requests from 2014-2018 (121 requests). Commercial requests for new service extensions also decreased, but not by as high of a percentage. The number of commercial requests equaled 18 in 2024 and compared to the average of 29 for the years 2014-2018.

While the number of requests steadily decreased over the years, the number of days to installation of new service reversed a long-term trend by decreasing in 2024. The days to installation for residential customers decreased from 54.6 in 2023 to 47.1 in 2024. Days to installation for commercial requests decreased by a larger amount, from 65.2 in 2023 to 30.5, in 2024. Because the number of days is still higher than the 2014-2018 annual average of 27.2 for residential and 29.1 for Commercial, the Department will continue to monitor the number of days taken for new installations.

For renewed service extensions to locations previously served, the Company has consistently taken an average of approximately 1 day to complete the extension for both residential and commercial customers. In 2024, there were 604 residential and 99 commercial service extensions for locations previously served, which is down from the ten-year average of 1,081 residential and 191 commercial extensions. Great Plains' service extension data provided in Schedule 4 excludes reconnection of service to customers disconnected by the Company for non-payment of service.

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<sup>21</sup> [Minn. R. 7826.1600](#). The reporting requirements are also similar to requirements in Minn. Stat. §§ 216B.091 and 216B.096 (Cold Weather Rule).

<sup>22</sup> 2024 Universal GSQ, at 4.

<sup>23</sup> Petition, at 6 and Schedule 4.

The Department concludes the Company met the service extension request reporting requirements in 2023.

#### *B.6. Customer Deposits*

The reporting requirements for customer deposits were updated by the notice in Docket No. 22-548:

All Gas Utilities shall report on customer deposits within their annual service quality reports whenever their deposit collection policies change.<sup>24</sup>

Great Plains does not require a deposit as a condition of receiving new service in 2024.<sup>25</sup> The Company did not provide deposit collection policy updates or policy change rationale as the Company stated that there was no change to this policy in 2024.<sup>26</sup> The Company did not require deposits in the last ten years.<sup>27</sup>

The Department concludes the Company met the customer deposit reporting requirement for 2024.

#### *B.7. Customer Complaints*

The gas utility reporting requirements for customer complaints are as described in the notice from Docket No. 24-548. The multiple reporting items include the following:

- The number of complaints received;
- The number and percentage of complaints alleging billing errors, inaccurate metering, wrongful disconnection, high bills, inadequate service, and the number involving service-extension intervals, service-restoration intervals, and any other identifiable subject matter involved in 5% or more of customer complaints;
- The number and percentage of complaints resolved upon initial inquiry, within 10 days, and longer than 10 days;
- The number and percentage of complaints resolved by taking: the action the customer requested, a mutually agreed upon compromise, providing the customer with information that demonstrates the grieved situation is not within the utility's control, or refusing to take the action requested by the customer; and
- The number of complaints forwarded to the utility by the Commission's Consumer Affairs Office (CAO) for further investigation and action.<sup>28</sup>

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<sup>24</sup> 2024 Universal GSQ, at 5.

<sup>25</sup> Petition, at 3.

<sup>26</sup> *Ibid.*

<sup>27</sup> *Ibid.*

<sup>28</sup> All customer complaint reporting requirements can be found at 2024 Universal GSQ at 6. *See also*, [Minn. R. 7820.0500](#). For the similar standards for electric utilities, see [Minn. R. 7826.2000](#).

Great Plains provided data on customer complaints that were escalated to a supervisor for resolution in addition to a breakdown of all calls (by category and resolution) in Schedule 6.<sup>29</sup> The Department provides a summary of Great Plains’ escalated customer complaint data below.<sup>30</sup>

Table 5a: Escalated Customer Complaints for Great Plains (2015 – 2024).<sup>31</sup>

Year	Number of Complaints	# Forwarded by CAO	% Same Day Resolution	% Resolved by Taking Customer-Requested Action	Top Complaint	
					Category <sup>32</sup>	%
2015	28	0	96%	4%	Billing Error	29%
2016	10	0	100%	0%	Billing Error	30%
2017	16	0	75%	0%	Billing Error & Payment Arrangements (tie)	25% each
2018	22	1	91%	0%	Wrongful Disconnection	41%
2019	28	1	89%	4%	Wrongful Disconnection	36%
2020	8	0	100%	0%	Billing Error	63%
2021	12	3	100%	8%	Service Restoration Intervals	42%
2022	8	4	100%	25%	Wrongful Disconnection	38%
2023	25	2	100%	16%	Billing Error	32%
2024	24	4	100%	0%	Payment Arrangement	42.0%
<b>10-Year Average</b>	18.1	1	97.90%	5.70%		

The number of escalated complaints has fluctuated year-over-year without a clear trend, but in 2024 the Company had 24 escalated complaints, including four which were forwarded by the Commission’s CAO. Both figures are higher than the ten-year average. The top category for escalated complaints in 2024 was with payment arrangements, which was followed by other (34%). Payment arrangements are not in the list of predesignated reporting items and were separately reported from other complaint reasons because over 5% of the complaints were over payment arrangements. Altogether 75% of the complaints would otherwise fit within the other category.

All escalated complaints were resolved the same day they were escalated. However, no request was resolved by taking the customer-requested action. Historically, most complaints (61.8% 10-year

<sup>29</sup> Petition, at 4 and Schedule 6; 2024 GP GSQ at 6.

<sup>30</sup> Petition, at Schedule 6.

<sup>31</sup> Petition, at 6 Schedule 4.

<sup>32</sup> Table 13 excludes “Other” as the top complaint category in favor of the top descriptive complaint category. “Other” was the top complaint category in 2014 (tie), 2015 (tie), and 2017. Petition, at 8.

average) have been resolved by demonstrating that the Company doesn't have control of the situation, and this was also the most common resolution in 2024 (44%).

Table 5b: Customer Calls by Complaint Category and Resolution Method (2015-2024).<sup>33</sup>

Year	Total Calls <sup>34</sup>	Calls for Detailed Categories	Top Detailed Categories		Action	
			Billing Error	Inadequate Service	Agree	No Control
2015	25,810	10,945 <sup>35</sup>	61%	7%	24%	61%
2016	21,924	10,056	60%	2%	25%	66%
2017	27,614	8,970	58%	3%	21%	71%
2018	22,979	12,252	57%	7%	21%	49%
2019	23,805	13,060	62%	8%	28%	52%
2020	21,281	10,291	78%	9%	33%	53%
2021	28,349	7,165	66%	13%	31%	50%
2022	43,978	5,284	63%	18%	35%	50%
2023	44,118	7,654	68%	17%	30%	51%
2024	39,232	7,813	76%	12.5%	22%	61%
<b>5-Year Avg</b>	35,392	7,641	70%	14%	30%	53%

In 2024, Great Plains received 39,232 complaints, down slightly from the ten-year high of 44,118 calls received in 2023. 7,813 of the complaints were for the complaint categories detailed in Minnesota Rules 7826.2000. Billing error has consistently been the top call complaint category, and in recent years, inadequate service has been another consistently high category. In 2024 only 22% of complaint calls were resolved by agreeing with the customer, below the 5 year average of 30%, and 61% were resolved by demonstrating that the Company did not have control over the issue.

The Department concludes Great Plains has met the customer complaint reporting requirements for 2023.

**B.8. Gas Emergency Phone Line Answer Times**

The Commission's notice requires Great Plains to report the telephone answer times to the utility's gas emergency phone line.<sup>36</sup> In addition, Great Plains provided the total number of gas emergency calls and the ratio of calls answered within 20 seconds, as summarized in Table 6 below, even though the Commission did not require this information from the Company.

<sup>33</sup> Petition, at 9 and Schedule 6.

<sup>34</sup> The Company expanded its IVR call tracking capability in 2022 to include both customer specific inquiries and general information requests. See Petition at 9.

<sup>35</sup> The 2015 Detailed Calls only include the following categories: Billing Error, High Bills, Service Extension, and Service Request. The Service Extension calls included here are the 105 which included details on the action taken. The additional Service Extension calls reported without resolution details are included in the total call count. Petition, at 3-4 and Schedule 6.

<sup>36</sup> 2024 Universal GSQ, at 6.

Table 6: Gas Emergency Phone Calls Received by Great Plains.<sup>37</sup>

Year	Number of Gas Emergency Calls	Avg Response Times in Seconds	% Answered in 20 Seconds or Less
2015	1,397	15	79%
2016	1,007	12	81%
2017	898	16	82%
2018	612	10	86%
2019	808	11	89%
2020	458	20	82%
2021	506	6	81%
2022	616	7	85.4%
2023	581	5	83.6%
2024	561	5	91.2%
<b>5-Year Avg</b>	544	8	86.7%

October was the lowest performing month for average answer times of the gas emergency phone line in 2024, at 6 seconds.<sup>38</sup> This figure was only slightly worse than other months that averaged response times of 3-5 seconds. Great Plains number of gas emergency calls has continued to decline over the last 10 years, and the Company has generally improved its average answer times.<sup>39</sup>

The Department concludes that Great Plains is compliant in emergency phone call reporting requirements for 2024.

*B.9. Gas Emergency Response Times*

The Commission’s notice in Docket No. 22-548 included requirements for the Company to report on its Gas Emergency Response Times. Specifically, the Commission required All Gas Utilities to report on the percentage of emergencies responded to within one hour and within more than one hour. In addition, the Commission required Xcel, CenterPoint and MERC to report on the average number of minutes it takes to respond to an emergency. The response time is calculated from when Great Plains is first notified of the emergency and the time that a qualified emergency response person arrives at the incident location and begins to make the area safe. Great Plains also provided its average response time despite that requirement not applying to the Company.

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<sup>37</sup> Petition, at page 6 and Schedule 10

<sup>38</sup> Petition, at Schedule 10

<sup>39</sup> See, *In the Matter of Great Plains’ 2020 Gas Service Quality Annual Report*, Department of Commerce, Comments, November 1, 2021, Docket No. G004/M-21-300 (eDockets) [202111-179382-01](#), at Attachment 1, Company Response to Department IR 4; the Company noted that starting in January 2021, a dedicated team of agents began answering Great Plains’ calls. Prior to this time, Call Center agents were handling calls for both Montana-Dakota Utilities Co. and Great Plains.

Table 7: Gas Emergency Response Time for Great Plains<sup>40</sup>

Year	Number of Emergency Calls Requiring Response	% Calls Responded to in <u>Less than One Hour</u>	% Calls Responded to in <u>More than One Hour</u>	Average Response Time (Minutes)
2015	174	99%	1%	15
2016	95	95%	5%	23
2017	376	98%	2%	22
2018	456	97%	3%	22
2019	538	98%	2%	20
2020	378	98%	2%	20
2021	441	98%	2%	19
2022	480	97%	3%	24
2023	424	97%	3%	23
2024	374	98%	2%	19
<b>10-Year Avg</b>	<b>374</b>	<b>98%</b>	<b>2%</b>	<b>20</b>

As shown in Table 7, Great Plains has consistently responded to the vast majority of gas emergency calls in less than an hour. In 2024, Great Plains responded to 98% of emergency calls within one hour (matching the ten-year average), and the Company had an average response time of 19 minutes. Six (or 2% of) calls’ response time exceeded one hour in 2024. All of those were after-hours calls or due to travel distance.<sup>41</sup>

The total number of gas emergency calls requiring response has increased over the last ten years. There was an average of 252 calls per year from 2014 – 2018 and an average of 439 calls from 2019 – 2024. In last years’ service quality filing the Company explained that Great Plains implemented a policy change in 2017 to begin reporting all emergency calls; however in prior years the Company only reported emergency calls that were for jurisdictional leaks.

The Department concludes the Company met the gas emergency response reporting requirements for 2024.

*B.10. Excavation Damages*

The Commission’s Notice in Docket No. 22-548, excavation damage reporting criteria is described below:

All Gas Utilities shall report on excavation damages using the following metrics:<sup>20</sup>

- a. The number of excavation tickets received;
  - b. The number of excavation damages;
  - c. The number of excavation damages per 1,000 excavation tickets;
- and
- d. The number of at fault damages.

<sup>40</sup> Petition, at Schedule 7.

<sup>41</sup> Petition, at 5.

An “at fault damage” shall be defined as a damage where the root cause of the damage falls under the responsibility of the utility or its contractors including mislocates made by the company or its contract locating companies.<sup>42</sup>

Table 8a below summarizes the results for Great Plains reporting requirements.

**Table 8a: Great Plains Excavation Damages<sup>43</sup>**

Year	Number of Excavation Tickets	Number of Excavation Damages	Damages per 1,000 Tickets	% at Fault Damages
2015	8,287	48	5.79	23%
2016	11,858	38	3.20	21%
2017	7,626	34	4.46	38%
2018	7,893	28	3.55	50%
2019	7,794	31	3.98	23%
2020	9,148	21	2.30	19%
2021	8,928	33	3.70	33%
2022	7,562	39	5.16	31%
2023	8,144	40	4.91	23%
2024	7,488	20	2.69	14%
<b>10-Year Avg</b>	<b>8,473</b>	<b>33</b>	<b>3.97</b>	<b>28%</b>

Great Plains excavation damages performed better than the previous 2023 year. Damages per 1,000 tickets decreased from 4.91 in 2023 to 2.69 in 2024. Also, the percent of damages where Great Plains states it was at fault fell from 23 percent in 2023 to 14 percent in 2024.

Great Plains also provided its quarterly Minnesota Office of Pipeline Safety (MnOps) Quarterly Utility Damage Surveys for 2024 including the root causes of excavation-related damages. Damage incidents in 2024 included the following categories:

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<sup>42</sup> 2024 Universal GSQ, at 7.

<sup>43</sup> Petition, at 13 and Schedule 8.

**Table 8b: Root Cause of Excavation Damage (2024)<sup>44</sup>**

<b>Root Cause</b>	<b>Incident Count</b>
Failed to Maintain Clearance	3
Failed to Determine Precise Location	4
Failed to Protect and Support During Excavation	2
Incorrect Records or Maps	2
Expired Notification	1
Mis-Marked	3
Excavation Outside Request	1
Failed to Maintain Marks	0
Notification Not Made (no locate ticket)	1
Damage by hand dig	1
Non-mechanized Equipment with no Locate Request	1
No Marked	1
<b>Total</b>	<b>20</b>

Gas system damages decreased from 40 in 2023 to 20 in 2025. Of the 20 damages in 2025, 5 were under the control of Great Plains’ employees and contractors, a decrease from the 2023 report. The root causes of excavation related damages as reported on the MNOPS Quarterly Utility Damage Survey in 2024 showed no single prevalent root cause.

The Department concludes the Company met the excavation damage reporting requirements for 2023.

*B.11. Service Interruptions*

The Commission required in its notice from Docket 22-548 that Great Plains report the number of service interruptions categorized by whether it was caused by the utility’s employees or contractors or whether it was due to any unplanned causes.<sup>45</sup> The Commission ordered in last year’s Gas Service Quality docket (24-32) that gas utilities, except Greater Minnesota Gas, report the number of customers whose service was interrupted, and the average duration of interruptions.

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<sup>44</sup> Petition, at Schedule 8. See [Minn. Stat. § 216D](#) for requirements for local units of governments. See also, [Minn. R. 7560](#) for excavator and utility responsibilities.

<sup>45</sup> 2024 Universal GSQ, at 7.

**Table 9: Service Interruptions for Great Plains (2015-2024).**<sup>46</sup>

Year	Number of Interruptions			Total Number of Customers Affected	Average Duration (Minutes)
	Total Outages	% Caused by Great Plains	% Caused by Others		
2015	34	26%	74%	250	551
2016	38	16%	84%	213	236
2017	30	40%	60%	146	180
2018	19	42%	58%	252	166
2019	18	33%	67%	355	187
2020	12	25%	75%	216	151
2021	28	29%	71%	236	165 <sup>47</sup>
2022	35	29%	71%	127	146
2023	30	30%	70%	163	147
2024	17	29%	71%	103	128
<b>10-Year Avg</b>	<b>26</b>	<b>30%</b>	<b>70%</b>	<b>206</b>	<b>210</b>

The Department found no clear trends or overly concerning performance measures in 2024. Service interruptions have fluctuated year to year, but 17 outages for 2024 is lower than the 10-year average. The percent of service interruptions caused by Great Plains, the total number of customers affected, and the average duration of outage are less than the 10-year average.

The Department concludes the Company met the service interruption reporting requirements for 2023.

*B.12. Major Incidents and MnOps Reporting*

The 2024 notice in Docket No. 22-548 requires utilities to report:

Summaries of major events that are immediately reportable to the Minnesota Office of Pipeline Safety (MNOPS) according to the criteria used by MNOPS to identify reportable events.<sup>48</sup>

Great Plains did not have any reportable events that met MnOps criteria in 2024.

The Department concludes that Great Plains is compliant with this requirement.

*B.13. MnOps Violation Letters*

The Commission requires under the 2024 notice that:

<sup>46</sup> Petition, at 15 and Schedule 9.

<sup>47</sup> The Average Duration in 2021 was updated from the value reported in the Department’s Comments in Docket No. G004/M-23-78 based on review of the Petition’s Schedule 10 in the same docket.

<sup>48</sup> 2024 Universal GSQ, at 8.

All Gas Utilities shall provide a summary of any violations cited by MnOps along with a description of the violation and remediation in each circumstance, and a count of violations by citation code.

The Company received two MnOps violation letters in 2024. On June 17, MNOPS inspectors found an aboveground main at a bridge crossing and was incorrectly listed in the Utility's mapping system as underground. Great Plains is currently revising the mapping documentation from underground and is taking other compliance measures. A second letter on December 5 from MNOPS included three probable violations: (1) procedures to control atmospheric corrosion and patrolling procedures; (2) the Company did not patrol distribution pipelines subjected to physical movement or external loading as required by patrolling procedures; and (3) ready access to meters and shutoff valves. Great Plains is currently working on compliance.

The Department concludes that Great Plains is currently compliant having taken steps toward reaching a resolution. However, the Department will monitor the outcomes of these letters next year. Consequently, the Department recommends that Great Plains report progress on its compliance with the two MNOPS letters in its Gas Service Quality report for next year.

*B.14. Excess Flow Valves (EFV) And Manual Shut-Off Valves*

The Commission required in 2024 (Docket No. 22-548) that:

All Gas Utilities (except GMG, which has already completed the required outreach) shall confirm with the Commission that they have completed their EFV and manual shut-off valve outreach pursuant to the Commission's July 31, 2019, Order in Docket No. 18-41. Upon receiving confirmation from the Commission, utilities that have completed their EFV and manual shut-off valve outreach may cease annual reporting on EFVs, manual shut-off valves and related outreach in their annual service quality reports, ... Utilities shall continue appending their annual PHMSA reports to their service quality reports, which contains information on the number of EFVs and manual shut-off valves installed on their system.<sup>49</sup>

The Department's September 16, 2024, comments noted that Great Plains has completed its EFV and manual shut-off valve outreach.<sup>50</sup>

Commission Order Point 9 Approved the utility request to "cease reporting on EFVs, manual shut-off valves, and related outreach."<sup>51</sup> The Company attached its annual PHMSA report as required as Attachment A to its Petition. Therefore, the Department Concludes that Great Plains has met its requirements.

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<sup>49</sup> 2024 Universal GSQ at 9.

<sup>50</sup> 2024 GP GSQ, at 9.

<sup>51</sup> 2024 Order, at 2.

*B.15. Web Based Metrics*

In compliance with the December 22, 2023 Order, gas utilities must report the following web-based metrics starting in 2025 with the 2024 annual report:

- The percentage of uptime of the utility’s enterprise-wide website;
- The percentage of uptime for web payment services ability;
- The error rate percentage for the utility-based payment services;
- The yearly total number of website visits to initial facing enterprise-wide website; and
- The yearly number of logins via electronic customer communication platforms.<sup>52</sup>

Table 11: Web-Based Metrics (2024)<sup>53</sup>

Percentage Uptime		2024
	General Website	99.6%
	Payment Services	99.6%
Error Rate Percentage	Payment Services	0.0002%
Website Visits		203,908

Table 11 above summarizes Great Plains’ web-based metrics. The reported metrics may not reflect state-specific data as indicated in the December 22, 2023 Order. The 2024 report is the first year Great Plains’ reported web-based metrics; therefore, there is no historical data available. The Company does not appear to have reported on the number of yearly logins via electronic customer communication platforms.

The Department requests that the Company provide the number of yearly logins via electronic customer communication platforms in reply comments or provide an explanation of which data in Schedule 12 of the Company’s petition is related to this requirement.

**IV. DEPARTMENT RECOMMENDATIONS**

Based on analysis of Great Plains Gas Service Quality petition and the information in the record, the Department has prepared two recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above. The Department will make a final recommendation after reviewing the Company’s reply comments.

*B. REPORT ANALYSIS*

- B.13.1. The Department recommends that Great Plains report progress on its compliance with the two MNOPS letters in its Gas Service Quality report for next year.
- B.15 The Department requests that the Company provide the number of yearly logins via electronic customer communication platforms in reply comments or provide an explanation of which data in Schedule 12 of the Company’s petition is related to this requirement.

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<sup>52</sup> *In the Matter of an Exploration of Comparative Performance Metrics and Improvements to Natural Gas Service Quality Reports*, Order, December 22, 2023, Docket No. G002/CI-22-548 (eDockets) [202312-201514-01](#).

<sup>53</sup> Petition Schedule 12.

## **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. G004/M-25-32**

Dated this **22<sup>nd</sup>** day of **September 2025**

**/s/Sharon Ferguson**

<b>First # Name</b>	<b>Last Name</b>	<b>Email</b>	<b>Organization</b>	<b>Agency</b>	<b>Address</b>	<b>Delivery Method</b>	<b>Alternate Delivery Method</b>	<b>View Trade Secret</b>	<b>Service List Name</b>
1	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	Electronic Service		No	M-25-32
2	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service	Yes	M-25-32
3	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service	Yes	M-25-32
4	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service	No	M-25-32
5	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service	No	M-25-32
6	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service	Yes	M-25-32
7	Caitlin	Straabe	caitlin.straabe@mdu.com	Great Plains Natural Gas Co.		400 N 4th St Bismarck ND, 58501 United States	Electronic Service	No	M-25-32