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May 1, 2013

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

Re: **Comments of Greater Minnesota Gas, Inc. (GMG)**
Docket No. G022/M-12-1130

Dear Dr. Haar:

Greater Minnesota Gas Company (GMG) herein responds to those comments made by the Department of Commerce in Docket G022/M-12-1130 on March 11, 2013.

GMG met with Department staff on April 26, 2013 to develop a better understanding of the Departments concerns. GMG appreciates this opportunity as the Company did not fully understand the standards for the report. The Company appreciates the Departments clarification and responds to Department recommendations below:

The Department recommended that GMG provide the following:

- Monthly meter readings staffing levels, by work center on geographic area.
Response: The Company has 2 meter readers headquartered in Le Sueur, MN.
- A plan that will enable Greater Minnesota to comply with the meter reading reporting requirements established in the Commission's January 18 *Order*;
- A detailed discussion explaining why Greater Minnesota believes it is in compliance with Minnesota Rule 7820.4800;
- A detailed discussion of what steps, if the Company is not in compliance, of how Greater Minnesota will comply with Minnesota Rule 7820,4800 as soon as possible;
- A detailed discussion of what billing system the Company uses;

Response:

GMG responds to the above request in aggregate as the questions are related;

GMG uses the Banyon Data Systems utility billing system. The system is used by 274 municipal and smaller utilities in Minnesota. The System maintains 3 years of billing history on each individual customer and is compliant with Minnesota Rule 7820, 4800. The Departments concern was that GMG would not run a summary of total count of the number of estimated bills for a period exceeding 12 months. GMG has paid the software provider to program in this capability but is still working through technical issues with the software.

- **The Company provide “the required 2011 service extension information on requests for service to a location previously served by the Company;**

Response:

The Company did not lock any meters for failure to pay in 2011 and believed that was the question. However, the request deals with account transfer. GMG does not lock or stop service between transfers. The account responsibility is transferred on the day agreed to by the former and subsequent tenant. There are zero days delay in completing this task.

- **A full explanation of why dispatch was delayed for four incidences during 2011;**
- **A full explanation of why it took longer than one hour to respond to 13 emergency incidences during the reporting period;**

Response:

GMG appreciates the Departments request to clarify the information the Company reported and the Company’s response.

Dispatch- When the Company receives an emergency call, the customer is asked a series of questions developed by the Minnesota Office of Pipeline Safety. The questions include the following;

1. What is the Concern?
2. If there is a gas smell is the smell inside or outside the home?
3. Is the odor weak or strong? Is there blowing gas?
4. If weak has the customer smelt gas before?
5. Has there been recent construction activity?

Three of the four that were dispatched in over an hour were weak odors detected outside the home near the meter. The Company dispatches the closest a technician to check the situation but allows the technician to complete the current work task before response; these three events were not classified as emergencies.

The fourth call regarded a carbon monoxide detector going off after a power outage to a home. The root cause was the backup battery had not been replaced. It took 11 minutes to walk the customer through the process.

Emergency Response:

GMG provided information on 100% of the calls received by the Company with the potential for emergency. As discussed with dispatch the Company asks a series of questions to help understand the situation before dispatching technicians. The overall average response time for the company to have a technician on sight was 42 minutes in 2011.

The Department concerns were focused on why thirteen (13) times the Company responded in more than an hour:

Nine (9) of the thirteen (13) responses were related to faint smells of gas outside by meter. The Company allows technicians to complete current job effort before responding on these calls.

One (1) was related to a pilot light going out. The customer requested someone follow up the next morning.

One (1) of the calls was due to coordination with Centerpoint Energy. The original call went to Centerpoint Energy rather than to GMG. The total time of this response was 1 hour 11 minutes.

One (1) of the calls occurred over a weekend and the on-call technician had to travel across the service area. Total time of this response was 1 hour and 5 minutes.

One (1) of the calls was a request by a contractor for GMG to double-check service. The call was not an emergency.

- **A clarification of how services were located when the Company was responsible for gas line damage;**

GMG personnel were responsible for the two missed locates. The Company does not use a third party locator. As a reference point the Company has approximately 5800 Gopher State on Call tickets per year. GMG reviews each incident to see if changes can be made to avoid mis-locates.

- **A clarification of whether contractor caused service interruptions are related to Greater Minnesota Operations;**

No, the contractors were not working for GMG. The work being completed was not on behalf of any gas utility.

- A full explanation of why customer service expenses were relatively high in August and October 2011;

The Company incurred \$3,610 of auto related expense for the Company meter readers in August and \$3,994 of auto expense in October. These expenses were to ensure continued safe operation of the vehicles.

- A full clarification of whether any customer complaints were forwarded to the Company from the Commission's Consumer Affairs Office (CAO).

The Company reported the complaints that were escalated within the Company. None of these complaints were escalated to the Consumer Affairs Office (CAO).

GMG did have one (1) customer complaint that was escalated to the CAO in 2011 and has included a copy of the email chain which addressed the issue to completion for your review.

Greater Minnesota Gas, Inc. is available to answer any questions that the Department may have by contacting Nikki Kupser at (507) 665-8652 or nkupser@greatermngas.com.

Sincerely,

/s/ NICOLLE L KUPSER
Compliance & Regulatory Administrator
507-665-8652

Attachment

CERTIFICATE OF SERVICE

I, Nikki Kupser, 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 State Mail at Saint Paul, Minnesota.

Greater Minnesota Gas, Inc.

Comments

Docket No. G022/M-12-1130

Dated this 1st day of May, 2013

/a/ NICOLLE L. KUPSER

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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_12-1130_12-1130
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