



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](http://www.energy.mn.gov)

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June 27, 2013

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. G007,011/M-13-355

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 Minnesota Energy Resources Corporation (MERC or Company).

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

Greg Walters  
Regulatory and Legislative Affairs Manager  
Minnesota Energy Resources Corporation  
3460 NW Technology Drive  
Rochester, Minnesota 55901-8351

Based on its review of MERC's *2012 Annual Service Quality Report*, the Department recommends that the Commission **accept** the Company's Report pending MERC's response to various inquiries and the provision of additional information in *Reply Comments*. The Department's recommendations are listed at the conclusion of its *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. G007,011/M-13-355

**I. BACKGROUND**

The genesis of Minnesota Energy Resources Corporation's (MERC or Company) *Annual Service Quality Report* comes from the Minnesota Public Utilities Commission's (Commission) March 1, 2004 *Order* in Docket No. G007,011/CI-02-1369 (02-1369 Docket). In this *Order*, the Commission required Aquila, Inc. (MERC's predecessor) to file quarterly service quality updates in that docket and requested that the Minnesota Department of Commerce (Department), file its comments reviewing the Company's service quality reports by February 28<sup>th</sup> of each year. Aquila/MERC filed quarterly service quality reports in the 02-1369 Docket, and subsequent dockets,<sup>1</sup> through calendar year 2009.

On April 16, 2009, the Commission opened an investigation into natural gas service quality standards and requested comments from the Department and all Minnesota regulated natural gas utilities in Docket No. G999/CI-09-409 (Docket 09-409). Various rounds of comments and discussion occurred in this docket and the issues came before the Commission on August 5, 2010. In its August 26, 2010 *Order* (09-409 *Order*) in Docket 09-409, the Commission established uniform reporting requirements that Minnesota regulated natural gas utilities are to follow and a list of information that should be provided by each utility in a miscellaneous tariff filing to be made each May 1<sup>st</sup> reflecting service quality performance during the prior calendar year. The Commission determined that MERC would file subsequent annual service quality reports in lieu of the former quarterly service quality reports.

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<sup>1</sup> Docket Nos. G007,011M-07-1641 and G007,011/M-09-488.

The Commission supplemented the reporting requirements set out in its 09-409 *Order* with additional requirements in its March 6, 2012 *Order—Accepting Reports and Setting Further Requirements* in Docket No. G007,011/10-374, et. al. This March 6, 2012 *Order* also directed the Minnesota natural gas utilities to convene a workgroup to improve reporting consistency and address other issues. The workgroup<sup>2</sup> met on June 22, 2012 and developed more uniform reporting.<sup>3</sup> Reporting changes as a result of the workgroup consensus are noted in the analysis below.

MERC filed its first annual service quality report in compliance with the 09-409 *Order* on May 2, 2011 in Docket No. G007,011/M-10-374 (Docket 10-374). MERC filed its second annual service quality report in compliance with the 09-409 *Order* on May 1, 2012 in Docket No. G007,011/M-12-436.

On May 1, 2013, MERC filed its calendar year 2012 *Annual Service Quality Report* (Report). The Department provides its analysis below.

## II. THE DEPARTMENT'S ANALYSIS

### 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 80 percent of calls made to the business office during regular business hours within 20 seconds.

In its Report, MERC provided the required information on a monthly basis for 2012. The 2012 Report is the first report in which MERC included calls received by the Company's Interactive Voice Response (IVR) system. The information provided indicates that MERC was able to answer 80 percent, or more, of calls within 20 seconds in 11 of the 12 months reported.<sup>4</sup> In the month in which the percentage of calls answered in 20 seconds or less fell below 80 percent, MERC received 34,098 calls, 28 percent more calls than the average amount (26,704) received in the other 11 months of 2012. While not directly comparable, the percentage of calls answered in less than 20 seconds (81.6 percent) was over 1.5 percent higher in 2012 than it was in 2011 and 0.5 percent higher than it was in 2010. The Department concludes that MERC has met the level of service set by Minnesota Rules, part 7826.1200.

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<sup>2</sup> Participating in the workgroup were Xcel Energy, CenterPoint Energy, MERC, Great Plains, Interstate Power and Light, and the Department.

<sup>3</sup> See Attachments 1 and 2 for a matrix summarizing each utility's reporting content for each metric and a workgroup agenda.

<sup>4</sup> In October, 79.13 percent of calls were answered in 20 seconds or less.

In its March 6, 2012 *Order—Accepting Reports and Setting Further Reporting Requirements*, the Commission required all natural gas utilities to report average speed-of-answering calls. MERC has reported this data since its 2010 Report was filed. For 2012, the average speed of answer was 19.42 seconds. Average speed of answer for the years 2011 and 2010 were 18.25 and 17.42 seconds respectively; as reported, average speed of answer has been gradually increasing over the short period for which this information has been reported. The Department will continue to monitor this metric.

*B. METER READING PERFORMANCE*

In its 09-409 *Order*, the Commission required each utility to report meter reading performance data in the same manner as prescribed in Minnesota Rule 7826.1400. Specific to MERC, the Commission also required that the Company provide meter reading statistics related to farm tap customers. The Company provided, as an attachment to its Report, the meter reading performance data per Minnesota Rules both with and without farm tap data included. The Department notes that MERC has a large percentage of farm tap customers. These customers are required to self-read their meters, and to allow MERC to read the meters annually.

Based on the Company's information, the vast majority of MERC's customers (approximately 98 percent) have their meters read by MERC employees. MERC also included data regarding the number of meters that have not been read for 6-12 months and those that have not been read in over 12 months. When excluding farm tap customers, only 13 meters, out of a total of over 2.55 million meters, had not been read between 6-12 months, and 0 meters had not been read in over 12 months. This represents a slight increase in meters not read in 6-12 months compared to the 2011 figure of 6 meters unread in 6-12 months. However, both 2012 figures are significantly improved compared to the 2010 figures where 71 meters had not been read in 6-12 months and 38 meters had not been read in over 12 months. The differences between 2012 and 2011 meter reading data are not substantively different. The Company indicated that accessibility and dog issues were the primary reasons why meters were not read. When farm taps are included in the reporting metrics, the number of unread meters increases; however, it is important to note that the absolute number of meters not read for an extended period of time is still quite small (roughly one-tenth of one percent or less).

MERC's Report represents the third report where these data is available, which means the Company's 2012 performance can be compared to 2011 and 2010 figures. When excluding farm taps, given the large improvements made after 2010, the Department believes that MERC's 2012 performance is reasonable.

In terms of farm tap customers, the Department notes that the number of unread meters decreased significantly between 2010 and 2011 and increased slightly from 2011 to 2012.<sup>5</sup> There was a large increase in meters not read for 6-12 months at the end of 2012 but according to MERC's October 7, 2011 Reply Comments in Docket 10-374 and mentioned above, the Company is not obligated to perform monthly meter reads for farm tap customers but does perform one meter read per year for each of these customers. This could be a possible cause of the increased number of long term unread meters reported in late 2012. The Department invites MERC to explain in Reply Comments the end-of-year increase in unread meters. Finally, to provide context, the Company reported that the average number of meter reading staff employed by MERC was the same in 2011 and 2012.

### *C. INVOLUNTARY SERVICE DISCONNECTIONS*

The Commission's 09-409 *Order* requires each Minnesota regulated gas utility 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. The Company provided these data in an Attachment to its Report. Through the workgroup process, MERC agreed to include a summary of its Cold Weather Rule reports, attached to their Report as Attachment C

According to MERC's Report, disconnection levels were higher at the beginning of calendar year 2012 than at the end of the year and reached their peak during the spring of 2012 (roughly coinciding with the end of the Cold Weather Rule period). The Company's Report indicated that over 10 percent of total residential accounts were past due for 11 months of the year; at some points, almost 20 percent of total accounts were past due. These figures are improvements over last year's numbers, which were described as typical by the Company in Reply Comments filed June 22, 2012.

The Department also observes that the number of involuntary disconnections decreased in 2012 and the percentage of accounts restored within 24 hours nearly doubled over the same figures for 2011. The Department notes the improvements to these metrics over 2011 numbers.

### *D. SERVICE EXTENSION REQUESTS*

In its 09-409 *Order*, the Commission required that each utility provide in its annual Report service extension request information in the same manner as detailed in Minnesota Rule 7826.1600, items A and B, except for information already provided in Minnesota Statutes §§ 216B.091 and 216B.096, subd. 11. The Company provided, as an attachment to its Report, the service extension request data per Minnesota Rules.

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<sup>5</sup> The number of meters not read in 6-12 months increased by less than 300 meters, or by 0.01 percent.

Based on the Department's review of these data, it appears that MERC's service extension request response times to new residential customers have decreased to 2010 levels after increasing by an average of over 7 days per request between 2010 and 2011. Response times to commercial service extension requests increased by 11 days from 2011 to 2012 after decreasing by approximately 4 days from 2010 to 2011. The Department also observed a rather long average wait time of 61 days for commercial requests in April.<sup>6</sup> In its October 7, 2011 Reply Comments in Docket 10-374, the Company stated that the average length of time between request and installation may be artificially high because a builder may request service from MERC many days before the building is ready for gas meter installation. The Department notes that Minnesota Rule 7826.1600 requires that the response time be measured from when the date service is requested or the date at which the customer is ready to accept service and the date the service was provided. The Department notes that the Company was able to decrease extension intervals for new residential requests even as the number of requests for new residential installations increased by over 25 from 2012 to 2011. Conversely, commercial new service extension requests decreased from 2011 to 2012 as extension intervals increased over the same period. The Department recommends that MERC fully explain, in its Reply Comments, why the average commercial installation time increased and why April's average commercial response time was significantly longer than other months in 2012.

#### *E. CUSTOMER DEPOSITS*

In its 09-409 Order, the Commission required that each utility provide in its annual report data on customer deposits required for extension of service as detailed in Minnesota Rules part 7826.1900. MERC reported that 23 customers were required to make deposits in 2012, all due to diversion (theft). This is more than were required in 2010 (29) and fewer than were held in 2011 (16). As of the end of 2012, MERC held 695 deposits, of which 672 were held prior to 2012. The 695 deposits held at the end of 2012 represent 0.003 percent of active meters on the Company's system, and a decrease from the 881 deposits held at the end of 2011. The Department concludes that the number of deposits held by MERC appears to be reasonable.

#### *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. This is the third year that MERC has reported customer complaints in the manner prescribed by Minnesota Rule 7826.2000, which allows for comparison with 2010 and 2011 information. Prior to 2010, the Company did track customer complaints via its own two-tier system. However, the current reporting standard prevents an apples-to-apples comparison of annual complaints before 2010. To facilitate long-

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<sup>6</sup> Average commercial response time reported for February 2012 was 78 days, but as there was only one commercial installation in the entire month of February, the Department is excluding this data point from analysis.

term tracking and cross checking of customer complaint data, the utilities participating in the workgroup agreed to begin providing a copy of the May 1 customer complaint report required by Minnesota Rule 7820.0500 in their annual service quality report beginning with the 2012 report. A copy of the May 1, 2012 report was not included in MERC's Report. The Department requests that the Company provide a copy of the May 1 report with its Reply Comments.

MERC reported a total of 1,904 complaints received in 2012. This represents a decrease in total complaints of 636, or 25 percent, from 2011, and a decrease of 1353, or 41 percent, from 2010, the first year the reporting requirement was implemented. In the Department's June 15, 2012 Comments on the 2011 *Annual Service Quality Report*, the Department stated that it would "continue to monitor MERC's customer complaint levels and will bring definitive trends to the attention of the Commission." The Department sees no evidence of a definitive trend in customer complaint levels at this time but notes the significant decrease in customer complaints in 2012.

The 2012 *Annual Service Quality Report* is the third Report identifying specific categories of customer complaints. In its Comments on last year's report, the Department mentioned its concerns regarding the increase in service quality and meter adjustment complaints. In its Reply Comments, the Company explained that additional call center representative training had caused the change by enabling representatives to more accurately catalogue complaints. The top three complaint categories in 2012 were the Collection/Disconnection Issue, Service Quality, and Other categories. Collection/Disconnection Issue and Service Quality were both top three categories in 2011 and both increased from 2011 to 2012. The number of complaints classified under "Bill too High" dropped by over 2,300, to 258 complaints. The Department recommends that the Company provide, in its Reply Comments, a full explanation of why meter adjustment and service quality complaints increased again between 2011 and 2012. Specifically, MERC should address whether the increase in complaints, in particular service quality, is the result of additional changes in how the Company classifies complaints or whether those complaints are due to operational or other issues.

In terms of resolution time, the percentage of complaints resolved upon initial inquiry fell from 99.7 percent to 89 percent from 2011 to 2012. In 2011, only 10 complaints were not resolved upon initial contact, while in 2012 this number rose to 210. Additionally, the Department notes that while only 1 complaint in 2011 took longer than 10 days to resolve, 67 complaints went unresolved for more than 10 days in 2012. The Department requests that the Company provide, in its Reply Comments, a full explanation as to why the percentage of complaints resolved upon initial inquiry decreased from 2011 to 2012. Specifically, the MERC should address whether the decrease in complaints resolved upon initial inquiry is due changes in the way the Company processes disputes or whether the increase is due to some other issue.

The percentage of complaints resolved by taking customer requested action or reaching a mutually agreeable compromise decreased from 2011 to 2012 from 87 percent to 76 percent. This implies that 24 percent of complaints received in 2012 were either decided to be out of the Company's control or the Company refused to take the action requested.<sup>7</sup> The Department requests that the Company provide, in Reply Comments, an explanation as to why the rate of complaints resolved by either taking the requested action or reaching a mutually agreeable compromise decreased from 2011 to 2012.

There were 15 complaints forwarded to MERC by the Commission's Consumer Affairs Office (CAO) in 2012. This is 3 more than were forwarded in 2011. The Department will continue to monitor the number of complaints forwarded to MERC by the CAO for any definitive trends.

#### *G. GAS EMERGENCY LINE ANSWER TIMES*

In its 09-409 *Order*, the Commission required that Minnesota regulated natural gas utilities collect gas emergency phone line data. MERC provided these data in an attachment to its Report. Specifically, the Company provided data related to the total number of calls, the average telephone answer time, and the percentage of calls that were answered within 15 seconds (MERC's internal goal). The Department notes that this is the third year that the Company has reported these data in its annual service quality report.

According to the information provided by MERC, there were a total of 17,341 emergency phone calls during 2012, averaging approximately 1,445 per month. This represents a decrease in emergency calls of 130 compared with 2011. The average telephone answer time for the year was just 6.8 seconds. Average answer time in November was 9 seconds and average answer times for all other months never exceeded 7 seconds. These results are nearly identical to, but slightly better than, those reported in 2011, which were slightly better than the results reported for 2010. In addition, the Company provides data showing that for all but one month (November at 89.09 percent); it was able to answer over 90 percent of its emergency phone calls in 15 seconds or less. The Department appreciates MERC providing these data and hopes that the Company is able to maintain or further improve its emergency phone line response times in 2013.

#### *H. MISLOCATES*

The Commission's 09-409 *Order* requires Minnesota natural gas utilities 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. MERC provided the number of mislocates, by month, in an attachment to its

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<sup>7</sup> Complaints are divided into four resolution categories: "Taking action as customer request", "Agreeable Compromise", "Not within control of the utility", "Refuse".



Report. This is the third year that the Company has reported these data in its annual service quality report.

MERC's Report indicated that there were 24 mislocates in 2012 out of a total of 70,996 locates, resulting in an approximately 0.034 percent mislocate rate. Further, the maximum number of mislocates that occurred in a given month were 5, which occurred in August. The number of mislocates in 2012 is higher than the numbers of mislocates, 12 and 21, that were reported in 2011 and 2010, respectively. While the number of mislocates over the past three years appears to be quite low; the data series is too limited to draw any conclusions regarding any performance trend. The Department requests that MERC continue its efforts to minimize mislocates, and the Department will continue to monitor this reporting requirement in future service quality reports.

#### *I. DAMAGED GAS LINES*

The Commission's 09-409 *Order* requires Minnesota regulated gas utilities to provide data on damaged gas lines, including the number of lines damaged by Company employees or contractors, the total number of other damage events, and the number of events that were unplanned in nature. In its 2010 filing, MERC reported 177 total incidences of gas line damage, of which 171 were caused by parties not affiliated with the Company. In its 2011 filing, MERC reported 212 total incidences of gas line damage, of which 191 were caused by parties not affiliated with the Company. For 2012, MERC reported 174 damage events, which represents a decrease of approximately 18 percent in gas line damage incidents. The vast majority of these events, 142 or 81.6 percent, were caused by parties not affiliated with the Company (e.g., homeowners, other contractors). The Company also reported 32 events where gas line damage was caused by a utility employee or contractor. Based on these data, there was slight proportional and numerical increase in the amount of damage incidents caused by company employees or contractors in 2012 compared to 2011, even as the total number of incidents decreased. The Department is pleased to note that the Company did not report any damage events that were attributable to system issues (e.g., random equipment failure).

With only two years of data available, the Department is unable, at this time, to determine a typical annual number of gas line damage incidents but commends MERC for the decrease in damage incidents from 2011 to 2012. The Department will continue to monitor this metric in future service quality reports and recommends that MERC continue to work to decrease these events during 2013 and into the future.

#### *J. SERVICE INTERRUPTIONS*

In its 09-409 *Order*, the Commission required that Minnesota regulated natural gas utilities collect data regarding service interruptions. The utilities are required to separate these data into categories based on whether the event was caused by Company employees, Company contractors, or some other unplanned causes. MERC provided these data in an attachment to its

Report. The Department notes that MERC has provided data related to service interruptions in previous service quality reports. The number of service interruptions on MERC’s system is shown in Table 1 below.

**Table 1: MERC Service Interruptions**

2008	2009	2010	2011	2012
177	174	48	156	153

Based on comparisons with the (limited) historical data available, the Department concludes that the reported number of service interruptions on MERC’s system over the past 5 years shows no discernible trend.

In the categorical break down of the service interruption incidents, MERC reports decreases in interruptions caused by system integrity issues, from 3 in 2011 to 0 in 2012, and in interruptions caused by other parties, from 145 to 136. Service interruptions caused by MERC employees or contractors doubled from 8 incidents in 2011 to 17 in 2012. Even with the increase, service interruptions caused by MERC contractors or employees affected only one hundredth of one percent of MERC customers in 2012. The Department will continue to monitor this metric for emerging trends in future service quality Reports.

The Commission’s March 6 2012 Order in Docket No. G007,011/M-10-374, et. al. required MERC to provide the number of customers affected by a service interruption and the average duration of the interruptions beginning with its 2011 report. Through its participation in the workgroup, MERC indicated that it would calculate total outage time as beginning when the outage is reported and ending when service is restored to the last affected customer. Consequently, as part of its Report, MERC included a spreadsheet with an item-by-item breakdown of each service interruption in 2012. Generally speaking, service interruptions in 2012 involved a single customer and were short in duration. The Department noted four instances where 10 or more customers were affected by an interruption and seven events that lasted longer than 1,000 minutes. In its *Comments* on MERC’s 2011 *Annual Service Quality Report*, the Department defined unusual events as “instances where more than 10 customers were impacted [by an outage] and...events where the duration of the interruption was greater than 1,000 minutes (i.e., 16.7 hours)” and recommended that MERC provide, in Reply Comments, explanations discussing the cause of each “unusual” service interruption and why the events impacted several customers or lasted for an extended period of time. The Department recommends that MERC provide similar explanations for the unusual events reported in the 2012 *Annual Service Quality Report*.

*K. MnOPS REPORTABLE EVENTS*

The 09-409 *Order* also required Minnesota regulated natural gas utilities 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 2011 annual report, reporting 2 events, both caused by other parties and affecting 12 and 27 customers. MERC provided this information in at attachment to its Petition.

The Company lists 9 MnOPS reportable events during 2012. Of the 9, 0 were caused by MERC employees or contractors, 1 was caused by a system issue,<sup>8</sup> 5 were caused by other parties, 2 were determined to be non-incidents but were reportable due to building evacuations, and 1 reportable event involved a home being destroyed by an explosion and is still under investigation. Of the MnOPS reportable events, 3 resulted in no customer outages, 4 resulted in one customer experiencing an outage, 1 resulted in two customers experiencing an outage, and 1 resulted in 267 customers experiencing an outage. None of the reportable outages lasted more than 10 hours. The Department recommends that MERC provide, to the extent it is able, further information regarding the residential explosion that occurred on September 15, 2012 and that the Company continue to provide updates on the status and findings of the investigation.

*L. GAS EMERGENCY RESPONSE TIME*

In its 09-409 *Order*, the Commission required that Minnesota regulated gas utilities collect and provide data regarding gas emergency response times including a percentage breakdown of the number of calls responded to in less than an hour and the percent of calls responded to in more than an hour. In addition, the Commission required MERC to report the average number of minutes it takes to respond to an emergency. MERC provided these data in an attachment to its Report. The Department notes that MERC provided emergency response data in service quality reports prior to the 09-409 *Order*. In these earlier service quality reports, the Company remarked that its internal goal is to respond to 97 percent of emergency calls in less than an hour. Through the Company's participation in the workgroup, MERC agreed to provide data based on this internal gas emergency response goal beginning with the 2012 Report.

Based on information provided by MERC, the Department notes that the Company was only able to meet its internal goal during September 2012. This is consistent with performance in 2011 and exhibits an improvement over 2010, when MERC failed to achieve the goal during any month. In November 2012, only 76.8 percent of calls were responded to in an hour or less. The Department notes that this corresponds to a relatively high number of calls received that month—MERC received 880 emergency calls in November, compared to between 404 and 633

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<sup>8</sup> This event did not cause any customer service interruptions, which is why there were no system integrity interruptions reported in the previous section.

calls in every other month of 2012. In a table footnote, MERC explained that the increase in calls in November 2012 was the result of a “propane plant release resulting in over 300 leak calls.” MERC responded to 95 percent of calls in less than an hour in 2012, when November data is excluded.<sup>9</sup> This response level is consistent with 2011 performance and exceeds performance reported for 2010.

In terms of absolute emergency response time, the Company reported an annual average response time of 30 minutes, which falls to 28 minutes when outlying November data is excluded. The 28-minute average response time reported by the Company is an increase over the average response time of 27 minutes reported for both 2011 and 2010. On a monthly basis, the Department notes that the average response times are tightly clustered (again excluding November), with 29 minutes being the longest average response time (on 5 separate occasions) and 27 minutes being the shortest average response time (on 2 occasions). Given MERC’s service territory characteristics (e.g., large geographic footprint, low-density), it is not surprising that its average emergency response time would approach 30 minutes. That being said, the Department has reviewed only three years of data regarding this metric, so it is difficult to determine whether any trends are present or whether the 27-minute average response time is indicative of normal operating conditions; therefore, the Department does not make any conclusions at this time.

M. *CUSTOMER SERVICE RELATED OPERATIONS AND MAINTENANCE EXPENSES*

Along with the service quality data reference above, the Commission also requires Minnesota regulated natural gas utilities to report customer service related operation and maintenance (O&M) expenses related to its Federal Energy Regulatory Commission (FERC) 901 and 903 accounts. MERC provided these data in an attachment to its Report. The Department notes that the Company also provided this expense information in its 2011 and 2010 *Annual Service Quality Reports*.

In 2012, MERC reported total service quality related O&M expenses of \$6,409,328, which, on an average basis, translates into approximately \$534,111 of O&M expenses per month. The Company’s reported O&M expenses represent a \$46,993, or 0.74 percent, increase over 2011 expenses. This is a much smaller increase than the \$397,545, 6.67 percent increase reported from 2010 to 2011. 2012 is only the third year that these data have been provided; therefore, it is unclear whether the increases are a part of a trend. The Department will continue to monitor this metric in future service quality reports.

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<sup>9</sup> When November data is included the rate falls to 92.6 percent, which still falls inside the criteria established by the Commission in its 09-409 *Order*.

Generally speaking, monthly O&M expenses in 2012 were relatively close to the monthly average with the exception of October, where the Company reports expenses of \$753,406. The amount in this month is noticeably different than in other months in 2012; therefore, the Department recommends that the Company fully explain, in its Reply Comments, any, and all, reasons associated with these costs being noticeably different than the monthly average.

### III. SUMMARY AND CONCLUSIONS

Based on its review of MERC's 2011 *Annual Service Quality Report*, the Department recommends that the Commission accept the Company's Report pending MERC's response to various inquiries in Reply Comments. The Department recommends that the Company provide the following in its Reply Comments:

- an explanation for the large increase in meters not read for 6-12 months at the end of 2012;
- an explanation detailing why the average commercial installation time increased from 2011 to 2012 and why April's average commercial response time was significantly longer than other months in 2012;
- a full explanation of why meter adjustment and service quality complaints increased between 2011 and 2012. Specifically, MERC should address whether the increase in complaints, in particular service quality, resulted from additional changes in how the Company classifies complaints or whether those complaints are due to operational or other issues;
- a full explanation as to why the percentage of complaints resolved upon initial inquiry decreased from 2011 to 2012. Specifically, MERC should address whether the decrease in complaints resolved upon initial inquiry was due changes in the way the Company processes disputes or whether the increase was due to some other issue;
- a copy of MERC's May 1, 2012 customer complaint report required by Minnesota Rule 7820.0500;
- a detailed explanation of each unusual service interruption, as defined in the Department's comments on the Company's 2011 *Service Quality Report*; including, what caused the service interruption and why the event impacted several customers or lasted for an extended period of time;
- further information regarding the residential explosion that occurred on September 15, 2012 and updates on the status and findings of the investigation;
- an explanation detailing why monthly O&M expenses in October 2012 were noticeably different than the monthly average.

Natural Gas Service Quality Reporting Workgroup  
 Reporting Summary and Changes

	Xcel Energy	CPE	MERC	IPL	GP
<b>Call Center Answer Times</b>	Change: None. Already include IVR and billing calls.	Change: Eff with 2012 reports will add Service Level with IVR to Schedule 1.	Change: Eff with 2012 reports will add IVR calls to the telephone response information.	Change: None. Already includes IVR and all calls.	Change: None. Already include IVR calls.
Please describe how/what you report	Our report includes E&G residential calls to our call center representatives, business solutions center calls to our reps, 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.	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/GR-04-801. Excludes calls that only utilized IVR functionality.	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 all calls taking 24/7. Does not include IVR calls.	Percentage of calls answered within 20 seconds, including both gas and electric data. Includes all calls 24/7, including IVR.	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.
Able to include IVR calls in Telephone Response Metrics	We do include IVR handled outage and billing calls	We will add SL with the IVR included for 800/Credit/Move (CIC - Residential) reporting to Schedule 1 beginning with January 2012.	MERC is able to include the number of IVR calls in the telephone response information.	Will continue to include	Will continue to include.
<b>Customer Deposits</b>	N/A	N/A	N/A	N/A	N/A
Please describe how/what you report	Our reported deposits are from residential customers that have filed for bankruptcy (both E&G)	Schedule 5: The number of move orders and the number and percentage of deposits required as a condition of service, including deposits required for reconnection of service after disconnection due to credit issues.	Our report includes any deposits collected for the reporting year. We only collect from customers caught diverting (theft) service.	Deposit data is for new and reconnecting customers, consisting of both gas and electric data.	Deposits required as a condition for receiving new service.
<b>Customer Complaints</b>	Change: Eff with 2012 report, submits May 1 Complaint report.	Change: None. Already includes the May 1 Complaint report.	Change: None. Already includes the May 1 Complaint report.	Change: Eff with 2012 report, will include the May 1 Complaint Report.	Change: 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.
Please describe how/what you report	Customer advocate group- we report all complaints, source of complaint, type, and action we took and time to resolve, by month. Call center- all calls that come into call center by customer type, complaint type, and action we took. By month- both E&G	Schedule 6: Number of recorded residential and commercial complaints, reason/type of complaint, action taken, time to resolve complaint and number of complaints received forwarded by outside agencies.	Our report categorizes complaints by the following types, employee action/behavior, billing/over reading issue, collection/disconnection issue, service quality, meter adjustment, outage, high bill. We then report time to resolve. This is broken into 3 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 FUC complaints. This is all reported on a monthly basis.	All customer complaints are tabulated. Data includes both gas and electric complaints.	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.

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.</p> <p>Call center- we report specific call codes that we previously determined could be indicative of a complaint, this call center calls by customer type, call type, and action we took. By month-- both E&amp;G</p>	<p><b>AMV/BEP Issue:</b> Any Budget Billing issue, do not understand, too high or too low, question how calculated</p> <p><b>Billing Errors:</b> Bill print issues, adopted contract account errors, Landlord Agreement error</p> <p><b>Construction &amp; Maintenance:</b> Excess footage fees, out of season charges, frost burners, cost to add, change, relocate meter, cost to change pressure, meter location, ice shields, barriers, atmospheric corrosion inspection (ACT)</p> <p><b>Credit Arrangements:</b> GAP, Cannot afford/cannot pay, reasonably on time, defaulted arrangement, CWR, arrangement, recontact quote</p> <p><b>Disconnector Non-Pay:</b> GULM, Wrongful Disconnect, thought had arrangements, did not receive notice, disconnected during CWR, recontact fees, payment methods, scheduling requirements</p> <p><b>Disputed Charges:</b> Any dispute not involving an account currently in write off, Escrow, Investigation Bad Debt, landlord/tenant deposits, foreclosures, divores, roommate situations, disposed debt transfer, bank fee on inactive meter, dates of service (move in or out)</p> <p><b>Employee:</b> CSR Error, Employee Misconduct</p>	<p>MERC reports all calls which the call center/CSR believes to be a complaint. MERC has raised 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.</p> <p>Complaint resolution is reported by total number and percentage. The resolution categories include coding action as customer requested, agreeable compromise, not within the control of the utility, and refuse to customer requested action. The report also includes the number of PLC complaints. This is informational only as those complaints are included in the reported complaint numbers.</p>	<p><b>High Bill:</b> Customer initiated complaint regarding high usage (must be usage related, not simply high balance)</p> <p><b>Teacourse Metering:</b> Switched piping, inaccurate pressure gauge, misread, non registering meter</p> <p><b>EXT/programming:</b> meter change, estimated reads</p> <p><b>Collections/Inactive/Write-Off:</b> Account sent to collections, any collection agency related complaint</p> <p><b>Undequis Service:</b> Failure to accommodate customer expectations hold times, not following through with promised actions</p> <p><b>Web/Customer Self-Service/TVR:</b> Online Billing, My Account Online, Password locked, web issues, bill reminders, TVR Spanish option, difficulty navigating</p> <p><b>Payment Issues:</b> One Time Pay, extending error, missing payment, incorrect application, processing delay, refund checks late fee/due date, Energy Assistance payment, Bank Pay Issue</p> <p><b>Rate/Tax/fee:</b> Refusal of Service, Unclear Rates, franchise fees, taxes, basic charge, delivery charge</p>	<p>Effective with 2013 reports 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><b>Billing Errors - All billing complaints except high bills, low bills, zero usage/consumption, adjusted bills.</b></p> <ul style="list-style-type: none"> <li>Inaccurate Metering - Field/engineering/construction/maintenance issues, meter reading issues.</li> <li>Wrongful Disconnection - Turn-off or disconnect error, collections issues.</li> <li>High Bills - High bills due to usage or weather, billing issues.</li> <li>Inadequate Service - Customer service issues such as poor service, long waits, delayed responses, lack of follow up.</li> <li>New Service Connection Intervals - New service issues relating to field/engineering/construction/maintenance departments.</li> <li>Service Restoration Intervals - Outage issues relating to field/engineering/construction/maintenance departments.</li> <li>Payment Status - Late payment, incorrect payment amount, late payment penalty, missing payment, promise to make payment, returned payment fee.</li> <li>Turn-on - Issues with turn-on order for service, wrong date, not complete, not issued correctly, lack of customer contact.</li> <li>Meter Reading/Other - Meter reading issues such as no read/estimate/mis-read, read cycle, reader access, reader behavior, read read cycle.</li> <li>Payment Arrangement - Payment agreements - short and long-term, zero defaults, multiple agreements, agreement disputes, promise to pay.</li> <li>Credit &amp; Collections General - Bankruptcy, collection agency/bureau issues, customer assistance programs.</li> <li>Property Damage - Report of damage to customer property/equipment, claims, insurance questions, boilers, construction, fire clearance, outages, weather.</li> <li>Tree Trimming - Issues with tree trimming - not notified, trimmed too much, trimmed too little, did not like way trimmed, trim cycle.</li> <li>Emergency Safety Issue - Outages, periodic meter change, planned maintenance/outage, power quality, radio interference, street/curb lights.</li> <li>Power Quality &amp; Reliability - Outages, blinks, quality issues.</li> <li>Customer Payment Programs - Programs such as Automatic Payment, Previous Billing, Western Union, CheckFree, Budget Billing, Customer Assistance programs.</li> <li>Non Utility Billing - Bill items, Contribution Tax, Adher bill detail disputes charges, disputes responsibility, finance charges.</li> <li>General Billing Questions/General Other - All other.</li> </ul>

Provide description of what is being reported in the Complaint numbers.

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	Xcel Energy	CPE	MERC	IPL	GP
Provide description of what is being reported in the Complaint numbers (continue).		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, Chain/Restoration, BP Verification, CIP, Masking, Vehicle Operation Pinpoint: Any complaint involving transfers part of the Pinpoint initiative Decoupling/IBR: Any complaint pertaining 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 type of complaints. It most cases these are customers who a perception's bill is too high based on various factors such as credit reports or low gas costs (why does gas cost me \$100/Dth when the media is telling me it is only \$20/05), weather impact, etc. In most cases it is CDSs 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 estimated, 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 effectiveness (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.	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 7820.0300, whether those requirements overlap with the information provided in the annual gas service quality reports, and how these requirements compare and are reconciled.	While it seems redundant to file the same report in two different dockets, if it would be helpful to parties, we do not oppose. The reports are different- the annual customer complaint report under 7820.0300 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.	Schedule 17: Currently including a copy of the report filed, as required in Docket No. G006/CR-04-001.	This seems redundant and hopefully this can be reviewed and determined that the gas service quality fulfills this requirement.	Not a hardship to supply - this is already being done for electric.	Copy of report will be provided.



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	Xcel Energy	CPE	MERC	IPL	GP
<b>Meter Reading</b>	<p>Change: Eff with 2012 report, all utilities will report MR filing levels by geographic location, whether MRs have other non-MR responsibilities, and whether AMR is deployed in each reported geographic area.</p>	<p>Change: Eff with 2012 report, all utilities will report MR filing levels by geographic location, whether MRs have other non-MR responsibilities, and whether AMR is deployed in each reported geographic area.</p>	<p>Change: Eff with 2012 report, all utilities will report MR filing levels by geographic location, whether MRs have other non-MR responsibilities, and whether AMR is deployed in each reported geographic area.</p>	<p>Change: Eff with 2012 report, all utilities will report MR filing levels by geographic location, whether MRs have other non-MR responsibilities, and whether AMR is deployed in each reported geographic area.</p>	<p>Change: Eff with 2012 report, all utilities will report MR filing levels by geographic location, whether MRs have other non-MR responsibilities, and whether AMR is deployed in each reported geographic area.</p>
Please describe how/what you report	<p>Under 7826,140 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 7826,140 do not add to 100 percent because the Rule includes only the number of meters estimated for a 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&amp;G</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 personnel, the number of residential, commercial, total and percentage of meters read by customers, and the meter reading staffing 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 13 months.</p>	<p>MERC reports monthly total meters, meters company read and meters estimated or self-reads. MERC is not able to differentiate between an estimate or a self-read. The percentages 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 &gt; 12 months. Comments are also provided as to why meters were not read during those periods. Because of the number of farm tap customers MERC has we report both with and without farm taps included. Farm taps are required by company being required to read them once annually. MERC also provides meter reading staffing 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>Meter reading performance by month including both gas and electric data.</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>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>
Whether the utilities' data on the number of unread meters and unexplained meter readings is consistent with the utilities' data on the number of estimated billings under Minn. Rules, part 822.3400.	<p>Yes-we believe we are in compliance with the Rules.</p>	<p>The difference between the total number of meters and the number of meters read by the utility or its customers is the number of estimated meter readings due to an unread meter.</p>	<p>Yes</p>	<p>We include unexplained in our total.</p>	<p>Yes.</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>We have an integrated meter reading workforce and AMR system. We currently report by work center in compliance with Rule 7826,140 in our electric SQ report. We support maintaining this work center reporting consistent for both our gas &amp; electric SQ reports.</p>	<p>On the 2011 reports the streets 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>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>IPL is meeting its meter reading requirements with current staffing levels and does not feel it would be beneficial or relevant to complicate the reporting method. IPL's service territory and customer count is comparatively low, so this would provide minimal comparative value.</p>	<p>Currently reported by geographic area.</p>
Are "special"/"rebill" results included in reported Actual and Estimated meter read numbers?	<p>No.</p>	<p>No.</p>	<p>No.</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>
<b>Involuntary Service Disconnections</b>	<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: 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, IPL will begin reporting on its credit-related reconnections. Additionally, 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>
Please describe how/what you report	<p>Consistent with Order point 2D of the 8/26/10 Order Docket No. G999/CI-09-409, we reference the CWR docket but 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 consistent format by month with all amounts reported. (CWP, Rev.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 services were disconnected involuntarily (all data from Cold Weather monthly reports).</p>
Whether to require utilities to include in their annual service quality reports copies of the information they submit under Minn. Stat. §§ 216B.091 and 216B.095 (and/or summaries of this information), and if so, in what format.	<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 to 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>
Separate out credit-related reconnections to report (just non-credit-related) if not, include the # of disconnections as a way to approximate just non-credit-related disconnections.	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>

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	Xcel Energy	CPE	MERC	IPL	GP
<b>Service Extension Request Response Times</b>	<p>Change: None. Already excludes reconnections for non-payment. Connection to current customers are included in total connections.</p> <p>We report requests to service to new locations, both number of installations and average # of days to complete between request and completion by month. We do not report requests to locations previously served as the only people that we classify in this group are customers who have had their meter locked due to credit. We classify those reconnections for service upgrades or vacancy with our requests for new service - we classify them all together. This report is gas only.</p>	<p>Change: None. Already excludes reconnections 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 is complete for any service request (properties where prior service did not exist) and received service (properties where service previously existed) excluding locked meters related to credit issues.</p>	<p>Change: None. Already excludes reconnections 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 reported time 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: EIR with 2012 report, will exclude reconnections 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 reported 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 reconnections 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 Renewed 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 reporting, excluding locked meters related to credit issues.</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 this Commission would be receiving complaints. I've seen nothing to indicate this has been an issue.</p>	<p>Will exclude reconnections associated with non-payment.</p> <p>Provided in 2011 report.</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 -- too 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, 2012 Order in Docket No. G999/CI-09-09 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>
Whether to exclude from the gas service quality reports the number of reconnections and restoration of service requests that were processed after a meter was locked for non-payment of a bill and which are also reported under Minn. Stat. §§ 216B.091 and 216B.096.	<p>Change: EIR with 2012 report, will follow this mislocate criteria provided by CPE.</p>	<p>Change: None.</p>	<p>Change: EIR with 2012 report, will follow the mislocate criteria provided by CPE.</p>	<p>Change: EIR with 2012 report, will separate mislocated vs. not mislocated items, will attempt to report mislocates using the CPE criteria, will provide gas-only mislocates.</p>	<p>Change: None. Reported in this fashion for 2011 report.</p>
<b>Mislocates</b>	<p>We define mislocates as a gas line that was damaged as a result of misrouting or failure to mark a line. We divide the number of mislocates by the number of locate tickets per 1000 locate tickets.</p>	<p>Schedule 8: The number of mislocates due to misrouted 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 misrouted or failure to mark.</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>
Please describe how/what you report	<p>Yes, we can do this. It will be based on whether there was paint 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 will separate our mislocated vs. not marked 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>
Whether to require MERC, Xcel, Inverness, and Great Plains to provide the same level of underlying detail on the total number of mislocates (the number of misrouted lines and the number of failures to mark a line) that CenterPoint provided in its 2010 report.	<p>Determines whether a line is misrouted or failed to be marked. CPE performs an investigation on all gas damage using poor locate pictures taken by the locator to determine whether a line was properly marked or not marked at all. If there are nearby paint in the area of the damage but they are not within the 24 inch tolerance zone CPE determines the root cause of the damage to be a blamark. If there are no visible nearby paint in the poor locate pictures at the site of the damage CPE determines this root cause to be a failure to mark.</p>	<p>MERC photographs all line locates prior to excavation. If damage occurs, MERC will go back to the locate record (assuming a locate was requested) to verify if the locate was accurate. If it is determined the locate was not accurate according to CPE the contractor will be billed. If it is determined MERC or its contractor mislocated the facility the information is then included in the mislocate report portion of the Service Quality report.</p>	<p>MERC can break out the mis-locates and failures to mark issues, but will need to investigate further our ability to calculate error as a gas and electric locate tickets are not. In our reports, IPL will attempt to report mislocates using the CPE criteria in the 2012 report.</p>	<p>Great Plains investigates each damage to determine who is at fault after company or contractor locator also determine 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>
Assess whether can follow the Mislocate criteria provided by CPE	<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>
Separate out the electric Mislocates to gas-only?					

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<b>Gas System Damage</b>	<p>Change: None. Order Pt. 5 of the Commission's Order 11, 2012 Order in Docket No. G999/AA-10-885 sets the requirements for reporting the lost gas implications associated with at-fault contractor main strikes.</p>	<p>Change: None. Order Pt. 5 of the Commission's Order 11, 2012 Order in Docket No. G999/AA-10-885 sets the requirements for reporting the lost gas implications associated with at-fault contractor main strikes.</p>	<p>Change: None. Order Pt. 5 of the Commission's Order 11, 2012 Order in Docket No. G999/AA-10-885 sets the requirements for reporting the lost gas implications associated with at-fault contractor main strikes.</p>	<p>Change: EIT with 2012 report, will report gas damage by month. Order Pt. 5 of the Commission's Order 11, 2012 Order in Docket No. G999/AA-10-885 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 Pt. 5 of the Commission's Order 11, 2012 Order in Docket No. G999/AA-10-885 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 miles and the damage calculated per 100 miles of main.</p>	<p>Schedule 9; Damages by CPE Employees/Contractors, Damages by others, 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 its contractors, damaged by others or a system integrity failure.</p>	<p>Number of gas system damages, 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, seals, etc.)</p>	<p>The number of gas system damages, categorized as to whether the damage was caused by a GP employee/contractor or 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 lost gas and who pays for the cost of repairing damaged lines when the damage is not caused by the company or its contractors, as well as when the damage is caused by the company.	<p>Lost gas reporting via in Docket No. G999/AA-10-885. Amounts received from contractor damage bills are an offset to O&amp;M expenses.</p>	<p>Lost gas reporting via in Docket No. G999/AA-10-885. Contractors billed for cost of repairs. Amounts received from contractors is an offset to O&amp;M expenses.</p>	<p>Lost gas reporting via in Docket No. G999/AA-10-885. All at-fault contractors are billed for damages. Amounts received are an offset to O&amp;M expenses.</p>	<p>Lost gas reporting via in Docket No. G999/AA-10-885. Escrower is billed for cost of repairs. Amounts received are an offset to O&amp;M expenses.</p>	<p>Lost gas reporting via in Docket No. G999/AA-10-885. All at-fault contractors are billed for damages. Amounts received are an offset to O&amp;M expenses.</p>
<b>Gas Service Interruptions</b>	<p>Change: None.</p>	<p>Change: None.</p>	<p>Change: EIT with 2012 report, will provide calculated 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 Affected by XE and our contractors or other causes within those categories we indicate the number of homes, the number of customers, and the average outage time.</p>	<p>Schedule 10; Report outages due to CPE Employees/Contractors, outages due to others and total indicating the number of customer affected, number of outages, and the average duration of the outage. Also provide in Schedule 11 detail of MNOTS 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, others or system integrity. A monthly detailed report is also included including 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 - Define calculations for Average Outage Time and Total Outage Time	<p>The start of the outage is when it's noted 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>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>	

Annual Gas Service Quality Reporting Workgroup  
 Reporting Summary and Changes

	Xcel Energy	CPE	MERC	IPL	GP
<b>Gas Emergency Answer Times</b>	<p>Change: Eff with 2012 report, include internal performance goal for answering gas emergency calls (8 percent in 8 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 these calls.</p>	<p>Change: Eff with 2012 report, include internal performance goal for answering gas emergency calls (8 percent in 8 seconds).</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 other than emergency calls. ASA and total number of calls answered are reported as originally required in Docket G009/GE-04-901.</p>	<p>Change: Eff with 2012 report, include internal performance goal for answering gas emergency calls (8 percent in 8 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 &lt; 1 hour or &gt; 1 hour. MERC also breaks this information down on 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: Eff with 2012 report, include internal performance goal for answering gas emergency calls (8 percent in 8 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: Eff with 2012 report, include internal performance goal for answering gas emergency calls (8 percent in 8 seconds).</p> <p>Total calls answered, percentage of calls answered in 20 seconds or less, and the average speed of answer.</p>
Please describe how/what you report					
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.	Already included in 2011 report	N/A	N/A	N/A	N/A
Whether to require the gas utility to include in their annual reports their goals for internal performance quality for answering gas emergency calls in terms of the percentage of calls answered within XX seconds	Internal goal is 80/20, though we place a priority on gas emergency calls.	Overall goal of answering 85% of calls within 20 seconds annually for all types of calls.	MERC already provides this information.	We strive to meet the goal of 80%.	Internal goal is 80/20, with a priority placed on gas emergency calls.
<b>Gas Emergency Response Times</b>	<p>Change: Eff with 2012 report, will provide MinOPS reports.</p> <p>We report all gas emergency calls- the count, the answer time, the dispatch/enroute time, travel time, and time of calls responded to under and over 60 minutes. (Our gas emergency call classifications are: blowing gas, explosion, fire, carbon monoxide with and without symptoms, dead regulator, smells gas inside, smells gas outside, no gas, and high or low pressure)</p>	<p>Change: None. Already provides MinOPS 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 memo and outside, as calls responded to in one hour or less and calls responded to in over one hour. CenterPoint Energy provides number and the percentage of emergencies responded to within one hour and while more than one hour. CenterPoint also provides the average number of minutes it takes to respond to an emergency. This same information, in total, is reported in the Emergency Response Report to the Minnesota Office of Pipeline Safety (MinOPS).</p>	<p>Change: Eff with 2012 report, will provide MinOPS reports.</p> <p>MERC provides the tech response time from initial call to arrival for all emergency calls. The numbers are categorized by &lt; 1 hour or &gt; 1 hour. MERC also breaks this information down on 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: Eff with 2012 report, will provide MinOPS reports.</p> <p>Any call coded as a gas emergency (CO, fire, line hit, odor) will be included in PUC submittals.</p>	<p>Change: Eff with 2012 report, will include an average 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>
Please describe how/what you report to the PUC					
Please describe how/what you report to MinOPS	We report five more types of calls in our gas QSP reports than we do in our MinOPS reports based on MinOPS preference (we do not report on any types of carbon monoxide calls, ice/snow on regulator, no gas, and high/low pressure gas to MinOPS).	Provide Monthly required reporting as specified by MinOPS and is duplicated in our PUC report.	Same as above	Any call coded as a gas emergency (CO, fire, line hit, odor) will be included in MinOPS submittals.	Same information is reported to MinOPS on the monthly Emergency Response Reporting Form.
Define call types included in MinOPS Reports	We report the following call types: blowing gas, explosion, fire, smells gas inside, smells gas outside	The orders that make up this report include all calls received from customers, contractors, passer-by's, 911 dispatchers, or company personnel relating to gas odors, gas leaks, indications of high pressure, fires, incidents, hit gas lines (either inside or outside).	MERC Plus 2 annual reports with MinOPS. One report provides emergency call responses 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.		GP reports fire, explosion, line hits, and odor calls.

Natural Gas Service Quality Reporting Workgroup  
 Reporting Summary and Changes

	Xcel Energy	CPE	MERC	IPL	GP
Highlight any differences between MaOPS Reports and MPUC reported items.	See above. We report five more types of calls in our gas QSP reports than we do in our MNOFS reports, based on MNOFS preference	We report the same items.	In the MPUC report MERC provides the % of calls answered in < 1 hour and < 7-1 hour and the average response time. For misdiagnoses MERC reports the total number of focuses same as the MaOPS 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	Note: Any call that is coded as an emergency will be included in the statistical reports submitted both to the Commission and MNOFS.	Great Plains was directed to report all gas service interruptions regardless of qualifying as reportable to MaOPS in Docket No. G004/M-13-565.
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 MaOPS Emergency Response Reporting Forms.	Already included in 2011 report	Currently providing monthly Emergency Response Forms information in the emergency response time in the quality report.	Only if it eliminates the need to report the same information in the emergency response time 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 MaOPS 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 MaOPS in the MaOPS Emergency Response Reporting Forms	It is not possible to reconcile the existing service quality and MaOPS reports due to the breakdown of the categories not matching due to how the 2 reports require different classification, and the differing events, as seen/seen of the QSP v. MNOFS forms.	Currently using MaOPS reports to complete Service quality reporting.	No opinion either way.	These numbers should be the same and could be provided.	GP reports this same information
Consider input from the Department on review of those 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 MaOPS 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 MaOPS reports for their annual reports, so no reconciliation is necessary.	As part of the Working Group, it was determined that all utilities will provide MaOPS reports for their annual reports, so no reconciliation is necessary.	Note: Any call that is coded as an emergency will be included in the statistical reports submitted both to the Commission and MNOFS.	As part of the Working Group, it was determined that all utilities will provide MaOPS reports for their annual reports, so no reconciliation is necessary.
<b>Major Incident Reporting</b>	Changes: Staff with 2012 reports will provide a summary of emergency response reports rather than each individual report.	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 we send 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.
<b>Customer Service Related O&amp;M Expenses</b>	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 NSPM (which includes MN, ND and SD operations) as well as the state of NN	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.
<b>Additional Service Quality Reporting</b>					
Please describe any additional information included in annual service quality reporting	QSP Tariff Annual Gas Emergency Response report.	Schedule 14, Steel 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/M-09-1190	N/A	N/A	N/A
<b>Docket Numbers</b>					
2002-2011 - E-G002/CI-09-2034	2004 - G-008/GR-04-901	2004 - G-008/GR-04-901	2003 - G007,011/CI-08-1389		
2003 - E-G002/M-03-58	2005 - G-008/GR-04-901	2005 - G-008/GR-04-901	2004 - G007,011/CI-08-1389		
2009 - G002/M-09-841 (SQ TARIFF AMENDMENTS)	2006 - G-008/M-06-1483	2006 - G-008/M-06-1483	2005 - G007,011/CI-08-1389		
2010 - E-G002/CI-10-693 (TARIFF MODIFICATION)	2007 - G-008/M-07-1641	2007 - G-008/M-07-1641	2006 - G007,011/CI-08-1389		
2011 - G002/M-11-340	2008 - G-008/M-08-396	2008 - G-008/M-08-396	2007 - G007,011/CI-08-1389		
2012 - G002/M-12-440	2009 - G-008/M-09-399 & G-999/CI-09-409	2009 - G-008/M-09-399 & G-999/CI-09-409	2008 - G007,011/CI-08-1389		
	2010 - G-008/M-10-378	2010 - G-008/M-10-378	2009 - G007,011/CI-08-1389		
	2011 - G-008/M-12-425	2011 - G-008/M-12-425	2010 - G007,011/CI-08-1389		

2009 - G-699 / CI-09-409  
 2011 - G004/M-13-565  
 2012 - G004/M-13-442

2010 - G999/M-11-361  
 2011 - G999/M-12-411

2003 - G007,011/CI-08-1389  
 2004 - G007,011/CI-08-1389  
 2005 - G007,011/CI-08-1389  
 2006 - G007,011/CI-08-1389  
 2007 - G007,011/CI-08-1389  
 2008 - G007,011/CI-08-1389  
 2009 - G007,011/CI-08-1389  
 2010 - G007,011/CI-08-1389  
 2011 - G007,011/CI-08-1389

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)

<b>Who</b>	<b>What</b>	<b>When</b>
<b>All Utilities</b>	Provide to-date SQ Dockets	Jun 29
	<u>Service Interrupts &amp; 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
<b>CPE</b>	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
<b>IPL</b>	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
<b>MERC</b>	Include IVR calls in Telephone Response metrics?	Jul 13
<b>GP</b>	<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. G007,011/M-13-355**

Dated this 27<sup>th</sup> day of **June, 2013**

**/s/Sharon Ferguson**



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500  Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_13-355_M-13-355
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_13-355_M-13-355
Michael	Bradley	bradley@moss-barnett.com	Moss & Barnett	4800 Wells Fargo Ctr 90 S 7th St Minneapolis, MN 55402-4129	Electronic Service	No	OFF_SL_13-355_M-13-355
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_13-355_M-13-355
Daryll	Fuentes	N/A	USG	550 W. Adams Street  Chicago, IL 60661	Paper Service	No	OFF_SL_13-355_M-13-355
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_13-355_M-13-355
Richard	Haubensak	RICHARD.HAUBENSAK@CONSTELLATION.COM	Constellation New Energy Gas	Suite 200 12120 Port Grace Boulevard La Vista, NE 68128	Electronic Service	No	OFF_SL_13-355_M-13-355
Amber	Lee	lee.amber@dorsey.com	Dorsey & Whitney LLP	Suite 1500 50 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-355_M-13-355
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_13-355_M-13-355
Brian	Meloy	brian.meloy@leonard.com	Leonard, Street & Deinard	150 S 5th St Ste 2300  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-355_M-13-355

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-355_M-13-355
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_13-355_M-13-355
Gregory	Walters	gjwalters@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	3460 Technology Dr. NW  Rochester, MN 55901	Electronic Service	No	OFF_SL_13-355_M-13-355