

Staff Briefing Papers

Meeting Date	April 12, 2018	Agenda Item *2
Company	Greater Minnesota Gas, Inc. (Greater Minnesota or GMG)	
Docket No.	G022/M-16-383 and G022/M-17-336	
	In the Matter of Greater Minnesota Gas, Inc.'s 2015/2016 Annual Gas Service Quality Report	
Issue	1. Should the Commission Accept GMG's 2015/2016 Annual Gas Service Quality Report?	
Staff	Marc Fournier	Marc.Fournier@state.mn.us 651-214-8729

 **Relevant Documents**

Date

Commission Order Accepting
GMG's 2014 Gas Service Quality Report,
Docket No. G022/M-15-434

August 16, 2017

GMG's Initial Filing 2015
Natural Gas Service Quality
Performance Report. G022/M-16-383

May 2, 2016

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 **Relevant Documents**

Date

GMG's Initial Filing 2016
Natural Gas Service Quality
Performance Report. G022/M-17-336

May 1, 2017

Comments of the Minnesota
Department of Commerce
Division of Energy Resources

June 22, 2017

Reply Comments of GMG

July 6, 2017

Response Comments of the Minnesota
Department of Commerce

November 14,
2017

Reply Comments of GMG

November 21,
2017

Additional Response Comments of the
Minnesota Department of Commerce

January 29, 2018

I. Statement of the Issues

Should the Commission Accept GMG's 2015/2016 Annual Gas Service Quality Report?

II. Background

On May 2, 2016, GMG filed its 2015 annual Gas Service Quality reports. On May 17, 2016, the DOC informed the Commission that it lacked adequate resources to ensure careful review and analysis of the utilities' reports and requested an extension to file comments on the reports. When the utilities filed their 2016 reports in May of 2017, the DOC's workload was anticipated to return to a more manageable level. As such, the DOC determined it would be able analyze both the 2015 and 2016 reports in 2017. The Commission granted the DOC's request that the comment deadlines be extended to coincide with the comment deadlines that was set for the utilities' 2016 reports that were to be filed by May 1, 2017.

On May 1, 2017, GMG filed its 2016 Annual Service Quality Report for 2016. On June 22, 2017, the DOC filed comments on the GMG's 2015 and 2016 reports. On July 6, 2017, GMG filed reply comments. On November 14, 2017, the DOC filed a response to GMG's reply comments. On November 21, 2017, GMG filed a response to the DOC's reply comments, and on January 29, 2018, the DOC filed a response in which it recommended that the Commission accept the Company's Reports.

III. Parties' Comments

DOC: Based on its review of GMG's 2015 and 2016 Annual Service Quality Reports and after reviewing the information provided in the Company's Reply to Response Comments, the Department recommends that the Commission accept Greater Minnesota's 2015 Report. In terms of the Company's 2016 Report, the Department also recommends that the Commission accept the filing; however, based on the record to-date, the Commission may conclude that Greater Minnesota's general response regarding its emergency response process is inadequate and therefore require the Company to use the fact situation of the 94-minute emergency response incident to develop a process improvement that may prevent a similar incident from occurring in the future.¹

GMG: With respect to the 94-minute response time incident, GMG is constantly engaged in self-assessment following emergency response incidents. It conducts regular safety meetings and, when there is an anomaly such as a lengthy response, GMG's personnel conducts table top drills to discuss risk paradigms and how to improve responses. GMG conducts training with local fire departments regarding its facilities focused on protection and safety in the event of a gas emergency. GMG consistently works to ensure safety and adopt best practices.

¹ The unusual nature of the events surrounding this incident are confirmed by the Company's statement that: "The situation presented an unforeseen circumstance that is not representative of GMG's emergency response times." Reply to Response Comments, Page 3.

The Minnesota Office of Pipeline Safety (MNOPS), the agency charged with ensuring safe industry practices, periodically reviews GMG's policies, procedures, training and qualification records, field investigations, and accident investigations if appropriate. GMG regularly passes MNOPS inspections and audits. As such, the Commission can be assured that GMG's practices are safe and appropriate.

GMG respectfully requests that the Commission accept GMG's 2015 and 2016 Gas Service Quality Annual Reports as in compliance with all applicable reporting requirements.

IV. Staff Analysis

Staff agrees with the recommendation of the DOC at page 6 of its January 29, 2018 additional response comments and accept GMG's 2015 and 2016 Annual Natural Gas Service Quality Reports. However, the Commission may wish to ask further questions of GMG regarding the 94-minute response time incident. Staff also notes that MNOPS is currently scheduled to attend the Commission's May 22, 2018 Planning Meeting.

V. Decision Options

1. Accept GMG's 2015/2016 Annual Gas Service Quality Reports.
2. Do not accept GMG's 2015/2016 Annual Gas Service Quality Reports.