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June 10, 2015

Mr. Dan Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 East Seventh Place, Suite 350
St. Paul, MN 55101

**Re: Review of 2014 Annual Service Quality Report
Docket No. G004/M-15-390**

Dear Mr. Wolf:

Pursuant to the Minnesota Public Utilities Commission's ("Commission") January 18, 2011 Order Setting Reporting Requirements for service quality information in Docket No. G999/CI-09-409, Great Plains Natural Gas Co. ("Great Plains") submitted its annual report on April 30, 2015 for calendar year 2014. Great Plains respectfully submits the following Reply Comments in response to comments filed by the Minnesota Department of Commerce on June 1, 2015 in the above-referenced proceedings.

If you have any questions regarding this filing, please contact me at (701) 222-7856, or Brian Meloy, at (612) 335-1451.

Sincerely,

/s/ Tamie A. Aberle

Tamie A. Aberle
Director of Regulatory Affairs

cc: Brian Meloy

**STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

Beverly Jones Heydinger	Chair
Dan Lipschultz	Commissioner
Betsy L. Wergin	Commissioner
Nancy Lange	Commissioner
John Tuma	Commissioner

In the Matter of 2014 Annual Gas)	Docket No. G004/M-15-390
Quality Report)	
)	

**REPLY COMMENTS OF
GREAT PLAINS NATURAL GAS CO.**

Pursuant to the Minnesota Public Utilities Commission's ("Commission") January 18, 2011 Order Setting Reporting Requirements for service quality information in Docket No. G999/CI-09-409, Great Plains Natural Gas Co. ("Great Plains") submitted its annual report on April 30, 2015 for calendar year 2014. Great Plains respectfully submits the following Reply Comments in response to comments filed by the Minnesota Department of Commerce (Department) on June 1, 2015, in the above-referenced proceedings.

Service Interruptions

At page 10 section K of its June 1 Comments, the Department noted an increase in the Company's average duration (minutes) of service interruptions in 2014 as compared to the previous three years as presented in Table 10 of the Department's June 1 comments. The Department requested that Great Plains provide a discussion in its Reply Comments regarding the reasons for the significant increase in duration of service interruptions during July, August, and October of 2014.

In July 2014, there were four service interruptions due to a contractor hitting a gas main. One of those service interruptions affected three customers with an outage duration of 2,880 minutes, or 48 hours. The absence of one of the affected customers from their home at the time of the interruption hindered the Company's ability to re-lite the customer's pilot after the repair to the main was completed causing the extended outage duration. Service to the other two customers was restored in approximately three hours. The remaining three interruptions in July had an average duration of 150 minutes or 2.5 hours.

In August 2014, there were six service interruptions due to a contractor(s) hitting a gas service line(s). One interruption affected one customer with a duration of 1,080 minutes or 18 hours. Another interruption also affected one customer and had a duration of 1,440 minutes or 24 hours. Both interruptions were caused by hits to PVC service lines. As the Company is currently replacing all PVC mains and service lines, the lines were replaced, rather than fixing the damaged area, extending the length of the interruption. The remaining four service interruptions in August had an average duration of 165 minutes or 2.75 hours.

In October 2014, there were five service interruptions due to contractors hitting a gas main(s). Two of the five service interruptions lasted 300 minutes each, or five hours, affecting 39 customers and one customer, respectively. A third interruption lasted 250 minutes or a little over four hours, affecting one customer. Damage to the gas main line(s) increased the duration of the service interruption. The remaining two service interruptions in October had an average duration of 90 minutes or 1.5 hours.

CONCLUSION

The increased duration in service outages was caused by unique circumstances in the months of July, August, and October. Great Plains respectfully requests that the Commission consider the reply comments expressed above and accept Great Plains 2014 Annual Service Quality Report.

Dated: June 10, 2015

Respectfully submitted,

By */s/ Tamie A. Aberle*
Tamie A. Aberle
Director of Regulatory Affairs
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