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October 18, 2018

Mr. Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101-2147

RE: IR Responses
2017 Annual Service Quality Report
Docket No. G022/M-18-314

Dear Mr. Wolf:

Attached hereto, please find Greater Minnesota Gas, Inc.'s (GMG's) responses to the Commission Staff's Information Request Numbers 1-6 for filing in the above-referenced docket. For ease of identification, GMG incorporated its responses with each Information Request.

All individuals identified on the attached service lists have been electronically served with the same.

Thank you for your assistance. Please do not hesitate to contact me should you have any questions or concerns or if you require additional information. My direct dial number is (507) 665-8657 and my email address is kanderson@greatermngas.com.

Sincerely,

GREATER MINNESOTA GAS, INC.

/s/

Kristine A. Anderson
Corporate Attorney

Enclosures

CERTIFICATE OF SERVICE

I, Kristine Anderson, hereby certify that I have this day served a true and correct copy of the following document to all persons at the addresses indicated on the attached list by electronic filing, electronic mail, or by depositing the same enveloped with postage paid in the United States Mail at Le Sueur, Minnesota:

**Greater Minnesota Gas, Inc.'s Response to Information Requests
Docket No. G022/M-18-314**

filed this 17th day of October, 2018.

/s/ Kristine A. Anderson
Kristine A. Anderson, Esq.
Corporate Attorney
Greater Minnesota Gas, Inc.

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.	202 S. Main Street Le Sueur, MN 56058	Electronic Service	No	OFF_SL_18-314_18-314
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-314_18-314
Ian	Dobson	residential.utilities@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_18-314_18-314
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_18-314_18-314
Brian	Gardow	bgardow@greatermngas.com	Greater Minnesota Gas, Inc.	PO Box 68 Le Sueur, MN 56058	Electronic Service	No	OFF_SL_18-314_18-314
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.	202 South Main Street P.O. Box 68 Le Sueur, MN 56058	Electronic Service	No	OFF_SL_18-314_18-314
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.	PO Box 68 202 South Main Street Le Sueur, MN 56058	Electronic Service	No	OFF_SL_18-314_18-314
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_18-314_18-314

This question is:

Trade Secret
 Public

**State of Minnesota
Public Utilities Commission**

Utility Information Request

Docket Numbers: G004/M-18-286, G008/M-18-312, G022/M-18-314, G002/M-18-316,
and G011/M-18-317

Date of Request: October 12, 2018

Requested From: CenterPoint Energy,
Great Plains Natural Gas Company,
Greater Minnesota Gas, Inc.,
Minnesota Energy Resources Corporation,
and Xcel Energy

Response Due: 30 business days

Analyst Requesting Information: Marc Fournier

Type of Inquiry:

<input type="checkbox"/>	Financial	<input type="checkbox"/>	Rate of Return	<input type="checkbox"/>	Rate Design
<input type="checkbox"/>	Engineering	<input type="checkbox"/>	Forecasting	<input type="checkbox"/>	Conservation
<input type="checkbox"/>	Cost of Service	<input type="checkbox"/>	CIP	<input checked="" type="checkbox"/>	Other:

Request Number	If you feel your responses are proprietary, please indicate.
PUC # 1	<p>Please provide an analysis of whether any of the following reports or data would enhance the Commission’s evaluation of the company’s level of service quality:</p> <p>a. The data required under <u>Title 49 Code of Federal Regulations §192.1007 (e)</u>:</p> <p>Performance measures developed from an established baseline to evaluate the effectiveness of a company’s Integrity Management (IM) program. These performance measures include the following:</p> <p>(i) Number of hazardous leaks either eliminated or repaired as required by § 192.703(c) of this subchapter (or total number of leaks if all leaks are repaired when found), categorized by cause;</p> <p>(ii) Number of excavation damages;</p>

(iii) Number of excavation tickets (receipt of information by the underground facility operator from the notification center);

(iv) Total number of leaks either eliminated or repaired, categorized by cause;

(v) Number of hazardous leaks either eliminated or repaired as required by § [192.703\(c\)](#) (or total number of leaks if all leaks are repaired when found), categorized by material; and

(vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the operator's IM program in controlling each identified threat.

- b. A summary of any 2017 emergency response violations cited by MNOPS along with a description of the violation and remediation in each circumstance; and
- c. The number of violation letters your company has received from MnOPS during the year in question.

GMG RESPONSE:

To the extent that the Commission asks for this or other information, GMG will make every effort to be as transparent and responsive as it can be. Nonetheless, as the Commission has indicated in other dockets, collecting information just for the sake of having it is not an effective use of resources, either for Commission and Department staff or for the utilities. Given that the information identified above is already provided to PHMSA and is reviewed annually by MNOPS, any deficiencies are addressed by experts in that area. To the extent that the Commission was also reviewing information and providing regulatory guidance, it would create a very real possibility of divergent and/or conflicting orders and confusion with regard to compliance requirements. GMG believes that the Commission would be better served by communicating directly with MNOPS if it seeks information with regard to those issues. GMG also believes that each governing body will be best served, as will the public and the utilities, by reviewing and regulating within the scope of each body's area of expertise and avoiding overlap to the extent possible. In this specific instance, that would result in the Commission focusing on customer service by the utilities and PHMSA and MNOPS focusing on safety, emergency response, and similar service by the utilities.

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<input type="checkbox"/>	Cost of Service	<input type="checkbox"/>	CIP	<input checked="" type="checkbox"/>	Other:

If you feel your responses are proprietary, please indicate.

Request Number	
PUC # 2	Please identify any other PHMSA and MnOPS reporting requirements not presently collected by the Commission that gas utilities might suggest as being useful in order to give the Commission a fuller picture of a gas utility's service quality performance. This may include reporting required by 49 CFR Part 191 such as the Incident Report required by §191.9 and the Annual Report required by §191.11

GMG RESPONSE:

GMG respectfully refers to and incorporates by reference its response to PUC Information Request #1, above.

This question is:

___ Trade Secret

___ Public

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Public Utilities Commission**

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Type of Inquiry:

	Financial		Rate of Return		Rate Design
	Engineering		Forecasting		Conservation
	Cost of Service		CIP		Other:

If you feel your responses are proprietary, please indicate.

Request Number	
PUC # 3	Please provide your company's standard customer service window for customer premise visits (when the customer's presence is required).

GMG RESPONSE:

GMG generally tries to schedule a specific appointment time with a customer where the customer's presence is required at the premises. The primary exception to that scenario is when a customer needs a reconnect visit, in which case a four hour window is provided. GMG offers the opportunity to the customer to receive a call ahead during that window, thus allowing a customer to have maximum flexibility for use of the customer's time during the four hour window. If the customer requests a shorter window, GMG makes every effort to accommodate that request.

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Utility Information Request

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Response Due: 30 business days

Analyst Requesting Information: Marc Fournier

Type of Inquiry:

<input type="checkbox"/>	Financial	<input type="checkbox"/>	Rate of Return	<input type="checkbox"/>	Rate Design
<input type="checkbox"/>	Engineering	<input type="checkbox"/>	Forecasting	<input type="checkbox"/>	Conservation
<input type="checkbox"/>	Cost of Service	<input type="checkbox"/>	CIP	<input checked="" type="checkbox"/>	Other:

If you feel your responses are proprietary, please indicate.

Request Number	
PUC # 4	Please provide the rationale for the length of your customer service window for customer premise visits (when the customer's presence is required).
	GMG'S RESPONSE:

In the event of planned visits that require a customer's presence at the premises, GMG believes that scheduled appointments best serve its goal of providing exceptional customer service. In reconnection situations that generally arise on the same day as the need for a technician to meet a customer at the premises, GMG believes that a four hour window strikes the appropriate balance between meeting the customer's need for convenience and the Company's ability to accommodate an existing schedule and staffing for emergent situations that could arise, particularly in light of GMG's efforts to make the visit as convenient as possible under the circumstances with a call-ahead or shortened window, as necessary.

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Utility Information Request

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Response Due: 30 business days

Analyst Requesting Information: Marc Fournier

Type of Inquiry:

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<input type="checkbox"/>	Engineering	<input type="checkbox"/>	Forecasting	<input type="checkbox"/>	Conservation
<input type="checkbox"/>	Cost of Service	<input type="checkbox"/>	CIP	<input checked="" type="checkbox"/>	Other:

If you feel your responses are proprietary, please indicate.

Request Number	
PUC # 5	If your company's customer service window for customer premise visits (when the customer's presence is required) is greater than four hours, are there other utilities or businesses that give customers a service window greater than four hours?
	GMG'S RESPONSE:

This question does not apply to GMG, as the customer service window does not exceed four hours.

This question is:

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Utility Information Request

Docket Numbers: G004/M-18-286, G008/M-18-312, G022/M-18-314, G002/M-18-316,
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<input type="checkbox"/>	Cost of Service	<input type="checkbox"/>	CIP	<input checked="" type="checkbox"/>	Other:

Request Number	
PUC # 6	If your company has a customer service window for customer premise visits (when the customer's presence is required) greater than four hours, is it possible or practical for the company to narrow the window to two or four hours?
	GMG'S RESPONSE:

This question does not apply to GMG, as the customer service window does not exceed four hours.