division of energy resources
Minnesota Department of Commerce

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June 15, 2012

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th 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-12-436

Dear Dr. Haar:

Attached are the *Comments* of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

> 2011 *Annual Service Quality Report* (Report) submitted by Minnesota Energy Resources Corporation (MERC or Company).

The 2011 *Annual Service Quality Report* was filed on May 1, 2012 by:

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

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'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/ ADAM JOHN HEINEN
Rates Analyst
651-296-6329

AJH/ja
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET NO. G007,011/M-12-436

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 stated that Aquila, Inc. (MERC's predecessor) should file quarterly service quality updates in that docket and that the Minnesota Department of Commerce, Division of Energy Resources (Department), should file its comments reviewing the Company's service quality reports by February 28th of the following year. Aquila/MERC filed quarterly service quality reports in the 02-1369 Docket, and subsequent dockets,[1] 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 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 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 1st 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. 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).

[1] Docket Nos. G007,011/M-07-1641 and G007,011/M-09-488.

On May 1, 2012, MERC filed its calendar year 2011 *Annual Service Quality Report* (Report).

The Department provides its analysis below.

II. THE DEPARTMENT'S ANALYSI

In its 09-409 *Order*, the Commission requested that each Minnesota regulated utility provide information on various service quality related reporting metrics. The Department addresses each of these reporting requirements separately below.

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 by month for 2011. On a monthly basis, MERC was able to answer 80 percent, or more, of its calls within 20 seconds during 7 months. The information also shows that, on an annual non-weighted average, MERC answered approximately 80 percent of its calls within 20 seconds in 2011.[2] The Department notes that the percentage of calls answered within 20 seconds is 1 percent less in 2011 than during 2010. These figures are not substantively different; as such, the Department concludes that the Company is providing reasonable service regarding call center response time during 2011 and expects that MERC will continue to be able to meet, or exceed, this service level during 2012.

Although not required by the Commission, the Company also provided the monthly average speed at which phone calls were answered. For 2011, the average speed at which phone calls were answered was approximately 18.25 seconds, which, for comparative purposes, is 1.25 seconds longer than in 2010. The Department appreciates this additional information.

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 and also meter reading performance related to its farm tap customers.

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[2] There were five months (January, 79.77 percent; February 77.39 percent; June 79.94 percent; August 78.63 percent; September, 76.92 percent) during which the Company was unable to answer 80 percent of phone calls within 20 seconds.

Based on the Company's information, the vast majority of MERC's customers (approximately 97 percent) have their meters read by MERC employees. MERC also includes 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 6 meters, out of a total of over 2.47 million meters, had not been read between 6-12 months, and 0 meters had not been read in over 12 months. This represents a significant improvement over 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 Department appreciates MERC's improvement in meter reading performance. The Company also included a description stating 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).

This represents the second report where these data is available, which means the Company's 2011 performance can be compared to 2010 figures. When excluding farm taps, the Department believes that MERC's 2011 performance is reasonable, and, as noted above, the Company's meter reading performance improved. .

In terms of farm tap customers, the Department notes that the number of unread meters decreased significantly between 2010 and 2011. There is a large increase in bills not read for 6-12 months at the end of 2011 but, as explained in MERC's October 7, 2011 *Reply Comments* in Docket 10-374, this spike in unread meters is representative of normal conditions with farm tap customers based on contract language with Northern Natural Gas. Finally, to provide context, the Company reported that the average number of meter reading staff employed by MERC was not substantively different between 2010 and 2011.

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. In response to a request by the Department in last year's review, the Company included its monthly Cold Weather Rule reports as an attachment to its *Petition*. The Company provided these data in an Attachment to its current Report. The Department reviewed this attachment and did not observe any significant events or anomalies related to involuntary service disconnections. The Department did, however, observe that disconnection levels were higher at the beginning of calendar year 2011 than at the end of the year and reached their peak during the spring of 2011 (roughly coinciding with the end of the Cold Weather Rule period). The Department also observed that the number of past due residential accounts were not, at any time during 2011, less than 10 percent of total residential accounts and, at some points, were approaching 25 percent of total accounts. The number of past due accounts appear high; therefore, the Department recommends that MERC fully explain, in its *Reply Comments*, whether the level of past due accounts in 2011 is considered typical and, if it is not, what steps the Company could take or is taking to minimize past due accounts in the future.

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.

Based on the Department's review of these data, it appears that MERC's service extension requests response times to new customers has increased in 2011 when compared to 2010. Specifically, in terms of residential customers, the average response time in 2010 was 17.9 days and 25.6 days in 2011, which represents an additional week between request and installation. The Department also observed a rather long average wait time of 50 days for July requests. 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 further notes that the number of requests for new residential installations were over 20 percent greater in 2011 and 2010, which could be a contributing factor in the additional time between request and installation. That being said, the Department recommends that MERC fully explain, in its *Reply Comments*, why the average installation time increased and why July's average response time was significantly longer than other months in 2011.

The average response times for existing addresses are comparable to the 2010 report; as such, the Department believes MERC's service performance in this area is reasonable.

E. 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 per Minnesota Rules. This is the second year that MERC has reported customer complaints in the manner prescribed by Minnesota Rule 7826.2000, which allows for comparison with 2010 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. On the other hand, since MERC has tracked total complaints in previous reports, the Department can compare the total level of complaints between years.

In terms of total complaints, MERC reported 3,257 complaints during calendar year 2011. This represents an increase in total complaints of 744, or approximately 30 percent, over calendar year 2010. It is important to note that the increase in complaints during 2011 marks the first calendar year since 2008 that the total number of complaints increased. Further, although complaints increased, they are still significantly lower than the 5,091 complaints reported in 2008. The Department remains encouraged that customer complaints remain significantly lower than those reported in 2008, but is concerned by the significant increase in complaints between 2010 and 2011. The Department will continue to monitor MERC's customer complaint levels and will bring definitive trends to the attention of the Commission.

Calendar year 2011 marks the second year that MERC reports specific categories of customer complaints. Based on its review of these complaint categories, the Department notes that the Company reported service quality and meter adjustment complaints; whereas, MERC did not report any such complaints in 2010. It is a concern that the Company reported these type of complaints in 2011 because these complaints are generally more serious since they can potentially indicate decreases in overall service quality or system integrity. In terms of meter adjustments, MERC reported 8 complaints and, in terms of service quality, the Company reported 188 instances. The number of service quality complaints are extremely high given the fact that MERC reported zero such instances in 2010. The Department believes the increase in complaints may be related to a change in how MERC classifies various complaints; however, that conclusion is speculative at this point. As such, the Department recommends that the Company provide, in its *Reply Comments*, a full explanation of why meter adjustment and service quality complaints increased between 2010 and 2011. Specifically, MERC should address whether the increase in complaints, in particular service quality, is the result of changes in how the Company classifies complaints or whether those complaints are due to operational issues.

In terms of resolution time, the vast majority of complaints were resolved during the customer's initial contact with the Company, and there were only 10 complaints that were not resolved during initial contact with the Company. In addition, of those 10 complaints, only 1 took greater than 10 days to resolve during 2011, which is lower than the 10 complaints that took longer than 10 days to resolve in 2010. During 2011, MERC reported that 12, or under 0.5 percent, of its total complaints were made with the Commission's Consumer Affairs Office (CAO). This level represents a decrease of 11 over the 23 complaints to the CAO that were reported in 2010. The Department will continue to monitor the number of complaints forwarded to MERC by the CAO for any definitive trends.

F. TELEPHONE ANSWER TIMES - GAS EMERGENCY

In its 09-409 *Order*, the Commission required that Minnesota regulated 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. The

Department notes that this is the second 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 17,471 emergency phone calls during 2011, averaging approximately 1,456 per month. This represents an increase in emergency calls of 1,199 over 2010. The average telephone answer time for the year was just over 7 seconds and there was no month during 2011 where the average response time was greater than 8 seconds. These results are virtually identical, but slightly better, than those reported in 2010. In addition, the Company provides data showing that for all but one month (June at 89.49 percent); it was able to respond to 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 improve its emergency phone line response times in 2012.

G. MISLOCATES

The Commission's 09-409 *Order* requires Minnesota 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 Report. This is the second year that the Company has reported these data in its annual service quality report.

The information provided by MERC shows the total number of locates during 2011 at 69,971 and only 12 (approximately 0.02 percent) mislocates. Further, the maximum number of mislocates that occurred in a given month were 3, which happened on two occasions (October and November). The number of mislocates in 2011 is slightly less than the number of mislocates, 21, that were reported in 2010. The number of mislocates over the past two years appear reasonable; however, the amount of time these data have been collected is still relatively short. The Department recommends that MERC continue its efforts to minimize mislocates, and the Department will continue to monitor this reporting requirement in future service quality reports.

H. 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. For 2011, MERC reported 212 damage events, which represents an increase of approximately 20 percent in gas line damage. The vast majority of these events, 191 or 90.1 percent, were caused by parties not affiliated with the Company (*e.g.,* homeowners, other contractors). The Company also reported 21 events where gas line damage was caused by a utility employee or contractor. Based on these data, there was slightly more damage to gas lines, across all types of causes, in 2011 when compared to 2010. On a positive note, the Company did not report any damage events that were attributable to system issues (*e.g.,* random equipment failure). Although the number of events increased, the Department does not believe the increase represents a significant difference between 2010 and 2011. 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. 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 2012 and into the future.

I. SERVICE INTERRUPTIONS

In its 09-409 *Order*, the Commission required that Minnesota regulated 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. Specifically, MERC reported 177 service interruptions events in 2008, 174 events in 2009, and 48 events in 2010.

The total number of service interruptions increased significantly in 2011. For calendar year 2011, MERC reported 156 total service interruptions, which is an increase of 108 over 2010. Although this is a large increase in service interruptions, it is important to note that the number of reported events in 2011 is still lower than the number of events in 2008 and 2009. As such, the Department does not believe that there were an unusual number of service interruptions in 2011.

However, in terms of sub-categories (*i.e.,* system integrity, caused by Company employee or contractor, other causes), the Department does have some concerns regarding the number of service interruptions related to system integrity. Although the vast majority of service interruptions in 2011 were caused by other parties (145) and Company employees or contractors (8), there were still 3 instances of system integrity related service interruptions. This figure represents approximately 2 percent of all service interruptions. Any issues related to system integrity are of serious concern and need to be addressed. The Department recommends that the Company provide, in its *Reply Comments*, a detailed explanation of how the Company defines system integrity and the circumstances surrounding each of the system integrity related events in 2011.

As part of its Report, MERC also included a spreadsheet with an item-by-item breakdown of each service interruption in 2011. Generally speaking, service interruptions in 2011 involved a single customer and were short in duration. That being said, there were two instances where more than 10 customers were impacted and also several events where the duration of the interruption was greater than 1,000 minutes (*i.e.,* 16.7 hours). The Department would classify these as unusual events; as such, the Department recommends that the Company provide a detailed explanation of each unusual event in its *Reply Comments*. These explanations should discuss what caused the service interruption and why the event impacted several customers or lasted for an extended period of time.

J. 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.

Based on information provided by MERC, the Department notes that the Company was only able to meet its 97 percent in less than an hour goal during March 2011. That being said, this marks an improvement over 2010, when MERC failed to achieve the goal during any month, and demonstrates continued improvement compared to 2008 and 2009. During 2011, there was no month where MERC was unable to respond to 93 percent or more of its emergency response calls in less than an hour and there were 9 months where the Company responded to more than 95 percent of calls in less than an hour. In addition, for the entirety of 2011, MERC responded to more than 95 percent of calls in less than an hour. During 2010, the Company was only able to reach the 95 percent response level during 7 months and its annual average did not reach this mark. In calendar years 2008 and 2009, there were two months during which MERC was only able to respond to approximately 90 percent of calls in less than an hour and, on average, the Company had an average percentage response of approximately 93 percent of calls in less than an hour. The 2011 data suggests that the Company was able to incrementally improve its emergency response time, and that MERC continues to move towards its 97 percent goal.

In terms of absolute emergency response time, the Company reported an annual average response time of 27 minutes, which was the same average response time in 2010. On a monthly basis, the Department notes that the average response times are tightly clustered, with 29 minutes being the longest average response time (on 2 separate occasions) and 26 minutes being the shortest average response time (on 4 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 be near 30 minutes. That being said, the Department has reviewed only two years of data regarding this metric, so it is still unclear whether the 27-minute average response time is indicative of normal operating conditions; therefore, the Department does not make any conclusions at this time.

K. OTHER SERVICE QUALITY METRICS

The 09-409 *Order* also required Minnesota regulated 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. In its 2010 Report, the Company stated that it would begin providing this information starting with its 2011 annual report. MERC provided this information in at attachment to its *Petition*.

The Company lists 2 MnOPS reportable events during 2011. In both instances, the events were caused by other parties (not MERC employees or system integrity issues) and affected more than 10 customers. The event which impacted the most customers, 27 in total, and lasted the longest time, 8 days, occurred at an airport and only impacted airplane hangars; as such, the general public was not adversely impacted. The other reported event involved 12 customers and lasted for just under 9 hours; it was caused by a non-utility contractor hitting a MERC service. In addition, this event occurred during the summer months, so the adverse impact to customers was less than if it had occurred during the heating season. The Department appreciates the Company's response and has no additional comments on this topic.

L. OPERATIONS AND MAINTENANCE (O&M) EXPENSES

Along with the service quality data reference above, the Commission also requires Minnesota regulated gas utilities to report customer service related 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 2010 service quality reports.

In 2011, MERC reported total service quality related O&M expenses of $6,362,335, which, on an average basis, translates into approximately $530,195 of O&M expenses per month. The Company's reported O&M expenses represent a $397,545, or 6.67 percent, increase over 2010 expenses. 2011 is only the second year that these data have been provided to the Department; therefore, it is unclear if this annual change in expense is reasonable. Given this, the Department recommends that MERC provide a detailed discussion, in its *Reply Comments*, explaining whether the increases in O&M expenses are reasonable and indicative of normal growth over time.

Generally speaking, monthly O&M expenses were relatively close to the annual average with the exception of August, where the Company reports expenses of $479,949, and December, where the Company reports expenses of $589,397. The amounts in these months are noticeably different than in other months in 2011; 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*:

- a full explanation detailing whether the level of past due accounts in 2011 is typical and, if it is not, what steps the Company has taken or is taking to minimize past due accounts;
- A full explanation detailing why the average service installation time increased between 2010 and 2011 and why July's average response time was significantly longer than other months in 2011;
- a full explanation of why meter adjustment and service quality complaints increased between 2010 and 2011. Specifically, MERC should address whether the increase in complaints, in particular service quality, is the result of changes in how the Company classifies complaints or operational issues;
- a detailed explanation of how the Company defines system integrity and the circumstances surrounding each of the service outages due to system integrity related events in 2011;
- a detailed explanation of each unusual service interruption event, as defined in these *Comments*; including, what caused the service interruption and why the event impacted several customers or lasted for an extended period of time;
- a full discussion explaining whether the increase in O&M expenses between 2010 and 2011 are reasonable and indicative of normal growth over time; and
- a full explanation of why O&M costs in August and December 2011 were noticeably different than the monthly average.

/ja

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-12-436

Dated this **15th o**f **June, 2012**

/s/Sharon Ferguson

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