

September 23, 2025

Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G022/M-25-35

Dear Ms. Bergman:

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

2024 Annual Gas Service Quality Report (Report) submitted by Greater Minnesota Gas, Inc. (Greater Minnesota, GMG, or the Company).

Greater Minnesota filed the report on May 1, 2025.

The Department recommends the Minnesota Public Utilities Commission (Commission) **accept Greater Minnesota's 2024 Annual Gas Service Quality Report**. The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

AT/ad
Attachment

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Acronyms and Abbreviations

CAO	Consumer Affairs Office of the Minnesota Public Utilities Commission
COVID	Coronavirus Disease
CWR	Cold Weather Rule
GMG	Greater Minnesota Gas
IVR	Interactive Voice Response
MERC	Minnesota Energy Resources
MNOPS	Minnesota Operations
PHMSA	Pipeline and Hazardous Materials Safety Administration
Plastic PE	Natural Gas – Polyethylene Pipe
SRSQ	Service Quality Report

Definitions



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. G022/M-25-35

I. INTRODUCTION

Greater Minnesota Gas (Greater Minnesota, GMG, or The Company) filed its 2024 annual gas service quality report (Report) on May 1, 2025. The Report covers the issues established in previous Minnesota Public Utilities Commission (Commission) Orders, including, but not limited to, call center response times, meter reading performance, involuntary disconnections, extension requests, customer deposits, customer complaints, gas emergency response times, excavation damages, and service interruptions.

The Department has reviewed the Company's Report and provides analysis below.

II. PROCEDURAL BACKGROUND

April 16, 2009	The Commission opened an investigation into natural gas service quality standards and requested comments from the Minnesota Department of Commerce (Department) and all Minnesota regulated natural gas utilities in Docket No. G999/CI-09-409. ¹
August 5, 2009	Issues related to Docket No. G999/CI-09-409, came before the Commission after various rounds of comments and discussion. During this Commission Agenda Meeting, Greater Minnesota Gas, Inc. (Greater Minnesota, GMG, or the Company) argued that, due to its size relative to Minnesota's larger regulated gas utilities, certain reporting requirements should be modified.
January 18, 2011	In its January 18, 2011, <i>Order—Setting Reporting Requirements</i> (Docket No. G999/CI-09-409 Order), the Commission determined Greater Minnesota must provide service quality information in the same manner as other Minnesota gas utilities, except as modified by the Commission's 09-409 Order. ²
November 18, 2022	The Commission established a Natural Gas Service Quality Working Group (NGWG) in Docket No. G002, G022, G004, G011, G008/CI-22-548

¹ *In the matter of a Commission Investigation into Gas Utility Service Quality Standards, Notice of Comment Period*, April 16, 2009, Docket No. G999/CI-09-409 (eDockets) [20094-36334-01](#).

² *In the matter of a Commission Investigation into Gas Utility Service Quality Standards, Order Setting Reporting Requirements*, January 18, 2011, Docket No. G999/CI-09-409 (eDockets) [20111-58629-01](#).

(Docket 22-548) to develop and refine future reporting requirements for natural gas utilities.³ The [Order](#) in this docket adopted the NGWG’s recommendations and authorized the Executive Secretary to establish a comprehensive list of current gas service quality reporting requirements which all gas utilities shall work from in future reporting. This list was documented in the February 2, 2024 [Notice of Gas Service Quality Reporting Requirements](#).⁴

May 1, 2025

Greater Gas filed its 2024 annual service quality report in the current docket.⁵

III. SUMMARY OF REPORT AND DEPARTMENT ANALYSIS

The Department reviewed GMG’s 2024 Report to assess compliance with the reporting requirements established by the Commission. The Department used information from past annual reports to identify issues and trends regarding Greater Minnesota’s performance.

The Department provides responses to the Commission’s questions and a summary of the Department’s review of GMG’s 2024 Report.

A. RESPONSE TO COMMISSION QUESTIONS

A.1. *Should the Commission accept CenterPoint, GMG, Great Plains, MERC, and Xcel Energy’s 2024 Annual Gas Service Quality Reports?*

Based on its review of Greater Minnesota Gas’ 2024 *Annual Natural Gas Service Quality Report*, the Department recommends the Commission accept the 2024 Report.

A.2. *Are there other issues or concerns related to this matter?*

The Department did not identify any other issues or concerns during its review of the Report.

B. REPORT ANALYSIS

The Department reviewed Greater Minnesota’s 2024 Report to assess compliance with the updated reporting requirements established by the Commission in Docket 22-548. The Department used information from past annual reports to facilitate identification of issues and trends regarding Greater

³ *Notice of Comment and Workgroup in the Matter of an Exploration of Comparative Performance Metrics and Improvements to Natural Gas Service Quality Reports*, November 18, 2022, Docket No. G002, G022, G004, G011. G008/CI-22-548 (eDockets) [202211-190735-01](#).

⁴ *In the Matter of an Exploration of Comparative Performance Metrics and Improvements to Natural Gas Service Quality Reports, Notice of Gas Service Quality Reporting Requirements*, February 2, 2024, Docket No. G002, G022, G004, G011. G008/CI-22-548, (eDockets) [20242-203037-01](#) (hereinafter, “Gas Service Quality Reporting Requirements”).

⁵ Greater Minnesota Gas, *Petition and Service Quality Metrics Spreadsheet*, May 1, 2025, Docket No. G022/M-25-35, (eDockets) [20255-218529-01](#) and [20255-218529-02](#) at Attachment B (hereinafter, “Petition” and “Service Quality Metrics Spreadsheet”).

Minnesota's performance.

The Department provides responses to the Commission's questions and a summary of the Department's review of Greater Minnesota's 2024 Report.

B.1. PHMSA Gas Distribution Reports

The Commission issued its "Notice of Gas Service Quality Reporting Requirements" on February 2, 2024, in Docket Number 22-548.⁶ That document included the following language regarding this topic:

"All Gas Utilities shall append their annual PHMSA⁷ Gas Distribution Reports to their Gas Service Quality Reports."

GMG included that information in Attachment B to the Report. Hence, the Department concludes the Company has complied with this reporting requirement for 2024.

B.2. Call Center Response Time

The "Notice of Gas Service Quality Reporting Requirements" issued on February 2, 2024, included the following language regarding reporting requirements for the Company:

GMG shall report:

- The total number of phone calls received during each annual reporting period; and
- The number of times a phone rings before it is answered.

All Gas Utilities shall report:

- The average time required to answer an incoming call.⁸

In its Report, Greater Minnesota reported that the incoming call rate is less than the number of calls received over the last several years. The Company explained this decrease in call volume in its report stating, "[...] GMG can only speculate regarding the reason for the decrease, GMG believes that it is likely related to GMG's change in billing software and the associated electronic payment vendor in 2024. As part of the transition process, GMG engaged in substantial telephone outreach to customers to help them get set up with the new system."⁹ Incoming calls to the Company include both customer-related and non-customer-related matters. In addition to issues such as payment or service questions, this phone line also takes calls from potential customers, developers, and builders, and receives other inquiries which may not be related to Greater Minnesota's natural gas operations.

⁶ *In the Matter of an Exploration of Comparative Performance Metrics and Improvements to Natural Gas Service Quality Reports, Notice of Gas Service Quality Reporting Requirements*, February 2, 2024, Docket No. G002,G022,G004,G011,G008/CI-22-548 (eDockets) [20242-203037-01](#) (hereinafter "Notice of Gas Service Quality Reporting Requirements").

⁷ PHMSA = Pipeline and Hazardous Materials Safety Administration.

⁸ Notice of Gas Service Quality Reporting Requirements at 6. Internal citations omitted.

⁹ Petition, at 2-3.

The Company’s 2013-2024 historical call volumes are summarized in Table 1.

Table 1: Call Volume Data (2014-2024)¹⁰

Year	Number of Calls Received (Yr.)	Annual Percentage Change in Calls
2013	12,876	NA
2014	13,399	4.06%
2015	11,308	(15.61)%
2016	10,812	(4.39)%
2017	10,705	(0.99)%
2018	10,981	2.58%
2019	10,927	(0.49)%
2020	11,893	8.84%
2021	12,713	6.89%
2022	12,997	2.23%
2023	13,679	5.25%
10-year Avg.	11,639	
2024	10,371	(24.18)%
% Chg. from 10-yr Avg.	(10.89)%	

The Department included a ten-year average and an annual percentage change calculation to this table for 2024. The Company’s 2024 results are compared to both the ten-year average and the 2023 results on a percentage basis. The intent of the inclusion of these two estimates was to provide both a long-term and short-term perspectives on how the different metrics are changing. The Department notes that the number of calls received in 2024 was 10.89% lower than the ten-year average number of calls received and 24.18% lower than the number of calls received in 2023.

The Company also included the average time required to answer a call (in seconds) for 2024 in the Report. GMG noted that incoming calls are answered live within three rings, or approximately 15 seconds.¹¹

If GMG customer service is unable to answer the call within three rings, the call is forwarded to a

¹⁰ Service Quality Metrics Spreadsheet. Historical information taken from prior annual reports and previous Department Comments. See *In the Matter of Greater Minnesota Gas’ 2023 Annual Gas Service Quality Report*, September 18, 2024, Docket No. G022/M-24-35 (eDockets) [20249-210298-01](#) (hereinafter “Historical Information taken from prior annual reports”).

¹¹ Petition, at 15.

professional live telephone answering service which typically answers within one additional second.¹² This call response time is consistent with what the Company reported in 2023. Based upon the information the Company included in its Report, the Department concludes Greater Minnesota met the Commission reporting requirements for call center response time.

B.3. Meter Reading Performance

The “Notice of Gas Service Quality Reporting Requirements” included the following language regarding this topic:

All Gas Utilities shall report, as described in *Minn. Rules, part 7826.1400*;

- The number and percentage of customer meters read by utility personnel;
- The number and percentage of customer meters self-read by customers;
- The number and percentage of customer meters that have not been read by utility personnel for periods of six to 12 months and for periods longer than 12 months, and an explanation as to why they have not been read; and
- Data on monthly meter reading staffing levels, by work center and geographical area.^{13 14}

GMG provided detailed meter-reading information, including information on its monthly meter-reading staffing levels.¹⁵ Table 2 (following page) summarizes Greater Minnesota’s meter-reading statistics.

The Company has grown over the last ten years. In 2024 the number of meters billed was 6.92% above the ten-year average and 4.15% larger than 2023. As noted in Table 2, (following page) GMG reported that all meters were read by the Company in 2024, consistent with 2023. Greater Minnesota also reported zero unread meters for more than six months and zero unread meters for greater than 12 months in calendar year 2024.¹⁶

The Company addresses its requirement regarding meter reading staffing levels in the 2024 Report and maintains one technician in each of its three regions (southern, central, northern) for meter reading data collection.¹⁷ Greater Minnesota also reported all meters have automatic meter reading capabilities and back-up support can be provided to assist live technicians if necessary.

¹² Petition, at 2-3.

¹³ Notice of Gas Service Quality Reporting Requirements at 3.

¹⁴ [Minn R. 7826.1400](#)

¹⁵ Petition, at 3.

¹⁶ *Ibid.*

¹⁷ Petition, at 2-3.

Table 2: Meter Reading Data (2013-2024)¹⁸

Year	Total Meters Billed	Company Read	% Company Read	Self-Read	% Self-Read	Annual Number Estimated	% Estimated
2013	62,868	56,623	90.07%	336	0.10%	1,376	9.4%
2014	66,284	64,357	97.09%	372	0.50%	1,555	2.35%
2015	80,580	79,570	98.75%	135	0.17%	1,010	1.25%
2016	84,371	83,784	99.30%	133	0.16%	458	0.54%
2017	92,456	92,297	99.83%	23	0.03%	136	0.15%
2018	99,567	99,561	99.99%	0	0.00%	6	<0.01%
2019	106,350	106,350	100.00%	0	0.00%	0	0.00%
2020	113,067	112,954	99.90%	0	0.00%	113	0.10%
2021	120,550	120,546	99.99%	0	0.00%	6	0.005%
2022	122,640	122,638	99.99%	0	0.00%	2	0.002%
2023	128,499	128,499	100.00%	0	0%	0	0%
10-year Avg.	101,436	101,056	99.48%	100	0.145%	466	1.38%
2024	133,836	133,732	99.92%	0	0%	104	0.08 %
% Chg. from 10-yr Avg.	6.92%	7.66%	0.55%	-100%	-100%	-100%	-100%
% Chg. 2024 from 2023	4.15%	4.07%	-0.08%	NA	NA	-100%	-100%

The Department concludes the Company met the meter reading reporting requirements for 2024.

B.4. Involuntary Service Disconnection Data

The “Notice of Gas Service Quality Reporting Requirements” included the following language regarding this topic:

All Gas Utilities shall append their December Residential Customer Status Reports, including data for January through December as filed in Docket No. E,G-999/PR-YY-02, in their annual service quality reports. Gas Utilities shall also provide a narrative explanation of their involuntary service disconnection performance, as needed, including steps taken to improve performance in the

¹⁸ Service Quality Metrics Spreadsheet. Historical information taken from prior annual reports.

future.¹⁹²⁰

GMG included that information in Attachment A to the Report. Table 3 summarizes Greater Minnesota’s historical residential customer disconnection statistics:

Table 3: Involuntary Disconnections (2013-2024)^{21,22}

Year	Number of Involuntary Disconnections
2013	63
2014	125
2015	122
2016	69
2017	39
2018	43
2019	16
2020²³	0
2021	18
2022	66
2023	39
10-year Avg.	54
2024	43
% Chg. from 10-yr Avg.	17%
% Chg. 2024 from 2023	10%

Involuntary disconnections in 2024, were 20% lower than the ten-year average and 10% higher than 2023.

GMG provided a summary of disconnect information from 2015 –2024 in Attachment A of the Petition. The Department developed Table 4 using that information. The Company has been increasing the number of residential customers since 2015 while disconnects have varied year-over-year without a clear trend. The Company typically has approved all requested Cold Weather Rule (CWR) requests since 2015.

¹⁹ Notice of Gas Service Quality Reporting Requirements at 4.

²⁰ [Minn R. 7826.1500](#)

²¹ *Ibid.*

²² *In the Matter of Greater Minnesota Gas’ 2014 Annual Gas Service Quality Report*, July 22, 2015, Docket No. G022/M-15-434, (eDockets) [20157-112669-01](#). (hereinafter “Department’s 2015 Comments”) As Noted in the Department’s Comments in the 2014 service quality report, older data may not be comparable to more recent data given the data concerns identified in that docket. These comparability issues still exist, so caution should be used when comparing older involuntary disconnection information with the post-2014 data.

²³ A disconnection moratorium was in effect from March 2020 to August 2021. See Docket E, G999/CI-20-375.

Table 4: Residential Customer Involuntary Disconnect Data (2015 – 2024)^{24,25}

Year	# of Res. Cust.	Received Disconnect Notice	# of CWR Requests	% of CWR Requests Approved	Disconnected Involuntarily	Restored within 24 Hours	# Entering Payment Plan
2015	6,036	N/A	29	100%	122	97	29
2016	6,717	N/A	18	100%	67	77	18
2017	7,310	N/A	14	100%	39	38	14
2018	7,770	N/A	13	100%	38	52	13
2019	8,175	N/A	9	100%	17	17	9
2020	8,586	N/A	0	-	0	0	0
2021	8,939	N/A	0	-	18	6	5
2022	9,411	1,663	0	-	66	11	66
2023	9,647	1,160	1	100%	39	4	37
8-Yr Avg	8,319	1,663	7	100%	35	26	20
2024	9,925	705	1	100%	43	14	1
2024 - 8-Yr Avg %	19%	58%	-85%	0%	23%	-46%	-95%
2024 - 2023 %	3%	-39%	NA	NA	10%	250%	-97%

The Department concludes the information Greater Minnesota provided regarding involuntary disconnections for 2024 met the new reporting requirements.

B.5. Service Extension Requests

The “Notice of Gas Service Quality Reporting Requirements” included the following language regarding Greater Minnesota’s reporting requirements:^{26 27}

GMG shall report:

Information on extensions to new service areas;

- The addition of new customers on existing mains;
- A discussion of requests for change in service to areas already served by the company;
- Copies of advertisements to potential new customers;
- The date deposits were first taken for a new service area; and
- An explanation of why customers along existing mains and services were denied service.

Table 5 below provides the historical information for new main extension projects.

²⁴ Petition, Attachment A (PDF page 14).

²⁵ As noted in the Department’s 2015 Comments, Comments in the 2014 service quality report, older data may not be comparable to more recent data given the data concerns identified in Docket. No. G022/M-15-434. As such, this table only includes data from 2015 -2023 as summarized in the Petition’s Attachment A.

²⁶ Notice of Gas Service Quality Reporting Requirements, at 4. Internal citations omitted.

²⁷ [Minn. R. 7826.1600](#)

Greater Minnesota did not undertake any new major extension projects in 2024. The Company hasn't developed any new major extension projects since 2019. This change of not adding new main extension projects since 2019, greatly lessens the value of the information derived from the 7-year average and the percentage changes in 2024 from that average and the percentage change from 2023 to 2024 in Table 5. These percentages are calculated below.

Table 5: New Main Extension Projects (2016-2024)²⁸

Year	Est. Number of New Res. Cust.	Actual Number of New Res. Cust.	Est. Number of New Firm Comm. Cust. Added	Number of New Firm Comm. Cust.	Est. Number of New Int. Comm. Cust.	Number of New Int. Comm. Cust.
2016	404	374	27	28	3	3
2017	281	278	1	1	0	0
2018	243	314	22	22	4	4
2019	0	0	0	0	0	0
2020	0	0	0	0	0	0
2021	0	0	0	0	0	0
2022	0	0	0	0	0	0
2023	0	0	0	0	0	0
7-yr Avg.	75	85	3	3	.57	.57
2024	0	0	0	0	0	0
% Chg. from 7-yr Avg.	-44%	-38%	-57%	-57%	-43%	-43%
% Chg. 2024 from 2023	NA	NA	NA	NA	NA	NA

Greater Minnesota also provided monthly data for on-main customer additions—customers who had access to GMG service but had not previously requested service. The Department provides a summary of annual service extensions for these customers in Table 6, below.

²⁸ Service Quality Metrics Spreadsheet. Historical information taken from prior annual reports

Table 6: On-Main Customers Added (2016-2024)²⁹

Year	Res. Service Requests	Avg # of Days to Install	Firm Comm. Service Requests	Avg # of Days to Install	Int.Comm. Service Requests	Avg # of Days to Install	Denied Service Requests
2016	276	27	7	23	2	26	0
2017	178	30	24	13	1	8	0
2018	327	27	0	0	1	35	0
2019	448	25	29	12	5	4	0
2020	389	21	61	33	4	36	0
2021	418	19	66	12	1	13	0
2022	374	18	62	17	0	0	0
2023	292	17	83	14	3	4	0
7-yr Avg.	347	22	46	14	2	14	0
2024	248	26	50	29	3	43	0
% Chg. from 7-yr Avg.	0.87%	18%	28%	-13%	0%	-17%	NA
% Chg. 2024 from 2023	-15%	53%	-40%	107%	50%	473%	NA

In 2024, the Company added 248 residential, 50 firm commercial and 3 interruptible commercial on-main customers and denied no service requests. The 2024 results compared to the seven-year average shows the number of new on-main residential service requests declined 0.87%, while the number of firm commercial service requests increased 28% and the number of interruptible commercial customers service requests remained the same as 2023.

Between 2023 and 2024, the number new on-main residential service requests declined 15%, while the number of firm commercial service requests increased 40% and the number of interruptible commercial customers service requests reflects a 50% increase.

The average time required to extend service in 2024 compared to the seven-year average was 18% lower for residential customers, 13% lower for firm commercial customers, and 17% lower for interruptible commercial customers.

Between 2023 and 2024, average time to extend service for residential customers increased from 17 days in 2023 to 26 days in 2024, the average time to extend service for the firm commercial service requests increased from 14 days in 2023 to 29 days in 2024. There were 3 interruptible commercial service requests in both 2023 and in 2024; these requests took an average of 43 days to install in 2024 compared to a seven-year average of 14 days.

The on-main service extension data for 2024 appears acceptable while results reflect an increase to install times for all on-main customers. Despite these increases there is an overall decrease to seven-year average install times for all on-main customers.

Given the small number of customer complaints in 2024, as discussed in below, the Department concludes the Company has reasonably dealt with service requests in 2024.

²⁹ *Ibid.*

Since the Company did not extend into new geographical areas in 2024, it did not distribute any advertisements or solicitations and therefore, appended no sample copies. As stated on page 4 of the 2024 petition, Greater Minnesota did not deny service to any customer requesting service in 2024.

The Department concludes the Company complied with the Commission's updated reporting requirements relative to service extensions.

B.6. Customer Deposits

Minnesota Rules 7826.1900 is applicable to regulated electric utilities.³⁰ The Commission required each natural gas utility to provide data on the number of customers required to make a deposit as a condition of receiving service for several years.³¹

The Commission issued its "Notice of Gas Service Quality Reporting Requirements" on February 2, 2024, in Docket Number G002,G022,G004,G011,G008/CI-22-548. That document included the following language regarding this topic:³²

All Gas Utilities shall report on customer deposits within their annual service quality reports whenever their deposit collection policies change. These reports shall include:

- a description of the previous deposit collection policy;
- a description of the new deposit collection policy;
- the reason for the policy change; and
- data from the previous three years regarding the number of customers who were required to make a deposit as a condition of receiving service including the total number of deposits held at the end of each year.

The Company noted in its Report: "GMG did not make any changes to its customer deposit policy in 2024 and therefore does not meet the requirement for customer deposit data as discussed above."³³ Greater Minnesota did reference that it required one new commercial customer to provide deposit as a condition of service, consistent with its existing tariff and customer deposit policy.

The Department concludes the Company has met the Commission's customer deposit reporting requirements for 2024.

B.7. Customer Complaints

The "Notice of Gas Service Quality Reporting Requirements" included the following language regarding the reporting requirements applicable to Greater Minnesota:^{34 35}
GMG shall report:

³⁰ [Minn. R. 7826.1900](#).

³¹ Gas Service Quality Reporting Requirements, at 5.

³² *Ibid.*

³³ Petition, at 5.

³⁴ Gas Service Quality Reporting Requirements.

³⁵ [Minn. R. 7826.2000](#)

- Complaints received from the Commission’s Consumer Affairs Office (CAO).
- The total number of complaints resolved for each of the following categories:
 - Billing errors
 - Inaccurate metering
 - Wrongful disconnection
 - High bills
 - Inadequate service
 - Service extension intervals
 - Service restoration intervals

All Gas Utilities shall include customer complaint data from Minnesota Rules 7820.0500 in their Annual Service Quality Reports.

The Company noted in its Report it had one complaint in 2024 concerning a billing error. This complaint was forwarded from the Commission’s Consumer Affairs Office (“CAO”) and was “related to GMG’s required safety inspection prior to reconnection when the customer’s natural gas service had been disconnected for an extended period.”³⁶ There were no forwarded complaints from Office of the Attorney General-Residential Utilities Division (OAG-RUD) in 2024 to GMG.

Greater Minnesota’s reported total number of complaints, on an annual basis, is summarized in Table 7 below.

Table 7: Annual Total Complaints (2013-2024)³⁷

Year	Complaints	Annual %Chg.
2013	3	NA
2014	4	33%
2015	4	0%
2016	1	-75%
2017	4	300%
2018	1	-75%
2019	1	0%
2020	3	200%
2021	0	-100%
2023	1	NA
10-yr Avg.	2.2	
2024	1	0%
% Chg. from 10-yr Avg.	4.8%	
% Chg. 2024from 2023	0%	

GMG’s complaint numbers are low in general. This small number of complaints leads to some large annual percentage changes. The ten-year average number of complaints rounded to 2. The 2024 result of 1 complaint is 52% below the ten-year average.

³⁶ Petition, at 6.

³⁷ Service Quality Metrics Spreadsheet.

After reviewing the Company's explanations, the Department concludes that Greater Minnesota's complaint reporting fulfilled the Commission's complaint-related reporting requirements.

B.8. Gas Emergency Phone Line Answer Time and Response Times

The "Notice of Gas Service Quality Reporting Requirements" requires the following information on reporting requirements for Greater Minnesota:³⁸

GMG shall report:

- The total number of gas emergency calls received.

The "Notice of Gas Service Quality Reporting Requirements" requires the following information on this topic:³⁹

All Gas Utilities shall report:

- The percentage of emergencies responded to within one hour and within more than one hour.

Table 8 below summarizes the historical number of gas emergency calls and response times.

Greater Minnesota reported 10% more calls in 2024 than the 10-year average, with 266 calls in 2024. The percentage of calls responded to within one hour in 2024 was 89% which was 4% below the ten-year average and 3% below the 2023 response rate. The 2024 average response time was 38 minutes. This response time reflects a 7% increase from the ten-year average time and a 6% increase from the 2023 average.

The 2024 average response time of 38 minutes time is the longest average gas emergency response time over the last ten years. The Department will continue to monitor the average response time for trends. GMG described several efforts underway to improve response times and noted several explanations for the delays in 2024, including road construction, driving conditions, and human error.⁴⁰

³⁸ *Id.*

³⁹ Gas Service Quality Reporting Requirements.

⁴⁰ Petition, at 7.

Table 8: Gas Emergency Calls and Response Time (2013-2024)⁴¹

Year	# of Calls	% of Calls Responded < one hour	# of Calls Responded > one hour	Avg Response Time (minutes)
2013	88	85%	15%	16
2014	110	93%	7%	36
2015	123	94%	6%	33
2016	219	95%	5%	30
2017	220	93%	7%	30
2018	248	96%	4%	29
2019	269	94%	6%	32
2020	249	93%	7%	33
2021	200	96%	5%	31
2022	380	93%	7%	30
2023	311	86%	14%	36
10-yr Avg.	233	93%	7%	32
2024	266	89%	11%	38
% Chg. From 10-yr Avg.	10%	0%	0%	7%
% Chg. 2024 from 2023	-14%	-3%	-24%	6%

The Department concludes that Greater Minnesota’s gas emergency phone timeline answer time information in the 2024 Report fulfilled the Commission’s gas emergency phone timeline answer time-related reporting requirements.

B.9. Excavation Damages (formerly Mislocates)

The “Notice of Gas Service Quality Reporting Requirements” requires:⁴²

All Gas Utilities shall report on excavation damages using the following metrics:

- a. The number of excavation tickets received;
- b. The number of excavation damages;
- c. The number of excavation damages per 1,000 excavation tickets, and
- d. The number of at-fault damages.⁴³

⁴¹ Service Quality Metrics Spreadsheet. Historical information taken from prior annual reports.

⁴² Notice of Gas Service Quality Reporting Requirements at 7.

⁴³ The definition of an “at-fault damage” is one where the utility or its contractors are responsible for the damages. It also includes mislocates made by the Company and its contractors

An “at fault damage” shall be defined as a damage were the root cause of the damage falls under the responsibility of the utility or its contractors including mislocates made by the company or its contract locating companies.

GMG has been providing its annual PHMSA Gas Distribution Reports, which include excavation ticket data, with its service reports since 2018, so the Department used this data to compare the 2024 excavation damages data in Table 9, below.

Table 9: Excavation Damages (2018-2024)⁴⁴

Year	# of Excavation Tickets	# of Excavation Damages	Damages per 1,000 Locate Requests
2018	9,312	23	2.47
2019	10,310	19	1.84
2020	10,686	22	2.06
2021	11,902	24	2.02
2022	9,988	11	1.1
2023	9,316	18	1.93
5-Yr Average	10,440	20	1.9
2024	8,940	16	1.8
% Chg 2024 to 5-Yr Avg	-14%	-20%	-5%
% Chg 2024 to 2023	-4%	11%	-7%

The number of excavation tickets and the number of excavation damages in 2024 were lower than the five-year average, and the Percentage (%) of Damages per 1,000 locate requests compared to the five-year average decreased slightly and the percentage change between 2023 and 2024 for this same metric decreased slightly.

The Company reported four at-fault excavation damages in 2024. This value is a 100% increase from the two reported at-fault excavation damages in 2023, due to a lack of historic data regarding this metric the Department will be monitoring future figures related to this issue for potential trends.

The Department concludes the Company has met the Excavation Damages reporting requirement for 2024.

B.10. Gas Service Interruptions

The “Notice of Gas Service Quality Reporting Requirements” required Greater Minnesota to report the following information on service interruptions:⁴⁵

⁴⁴ Petition, Attachment B.

⁴⁵ Notice of Gas Service Quality Reporting Requirements at 7.

GMG shall report:

- The number of unplanned service interruptions for outages due to:
 - Low system pressure,
 - Third party damage,
 - Other causes,
- The number of customers affected by each outage.
- The number of outages caused by GMG’s employees or contractors.

Table 10 summarizes GMG’s system damage events separated into damage caused by GMG and damage caused by others.

Table 10: Gas System Damage (2013-2024)⁴⁶

Year	Damage - GMG	Damage - Others	Total
2013	0	9	9
2014	0	9	9
2015	0	7	7
2016	0	9	9
2017	4	8	12
2018	5	18	23
2019	4	15	19
2020	6	16	22
2021	12	12	24
2022	1	10	11
2023	0	18	18
10-yr Avg.	3.2	12.2	15.4
2024	0	16	16
% Chg. from 10-yr Avg.	-100%	8%	6%
% Chg. 2024 from 2023	-100%	-11%	-11%

The Company identified 16 unplanned service interruption events in 2024. All 16 were the result of third-party damages.⁴⁷ None of the service interruptions were related to low system pressure or other causes. Of the 16 service interruptions in 2024, all were the result of third-party damages, with GMG stating that four of these were the fault of GMG’s locating contractor due to improper locating practices. Fifteen outages affected one customer per outage out of the 16 outages reported in 2024, and one outage did not impact any customers.

The 2024 results for total damage events were 6% higher than the ten-year average and an 11% decrease in comparison with 2023. For damages caused by GMG, the 2024 results were 0, hence both percentage changes compared to the ten-year average and the 2023 results were -100%. As for damage caused by others, the 2024 results were 8% above the ten-year average with an 11% decrease in comparison with 2023 results.

⁴⁶ Service Quality Metrics Spreadsheet. Historical information taken from prior annual reports.

⁴⁷ Petition, at 8.

The Department concludes that Greater Minnesota has complied with the Commission’s reporting requirements for Gas Service Interruptions.

B.11. Major Incident Reporting

The “Notice of Gas Service Quality Reporting Requirements” included the following language regarding this topic:⁴⁸

All Gas Utilities shall report:

- Summaries of major events that are immediately reportable to the Minnesota Office of Pipeline Safety (MNOPS) according to the criteria used by MNOPS to identify reportable events.
- Each summary shall include the following items:
 - The location
 - When the incident occurred
 - How many customers were affected.
 - How the company was made aware of the incident
 - The root cause of the incident
 - The actions taken to fix the problem.
 - What actions were taken to contact customers
 - Any public relations or media issues
 - Whether the customer or the company relighted
 - The longest any customer was without gas service during the incident.

Greater Minnesota didn’t have any major reportable events in 2024. From 2014 to 2023, the Company reported an average of 0.4 major reportable events per year.⁴⁹

The Department concludes that the Company met the required major incident reporting requirements for 2024.

B.12. Integrity Management Plan Reporting

The “Notice of Gas Service Quality Reporting Requirements” included the following language regarding this topic that pertains to GMG:⁵⁰

Xcel Energy, MERC, GMG, and Great Plains shall report the following metrics from their Annual PHMSA Distribution Reports in their service quality reports:

- Miles of Distribution Main
- Number of Main Leaks
- Number of Main Leaks by Cause

⁴⁸ Notice of Gas Service Quality Reporting Requirements at 8.

⁴⁹ *In the Matter of Greater Minnesota Gas’ Annual Gas Service Quality Report for the Calendar year of 2023, Service Quality Report Statistics 2023*, May 1, 2024, Docket No. G022/M-24-35 (eDockets) [20245-206292-02](#). Historical information taken from prior annual reports.

⁵⁰ Notice of Gas Service Quality Reporting Requirements at 8.

- Number of Hazardous Main Leaks by Cause
- Main Leaks per 1,000 Miles of Main
- Number of Services
- Number of Service Leaks
- Number of Service Leaks by Cause
- Number of Hazardous Service Leaks by Cause
- Service Leaks per 1,000 Services

The Department decided to include some historical information regarding the Company’s performance regarding gas leaks on its distribution system. Table 11 summarizes this information.

Table 11: 2024 GMG Leak Causes Compared to Four-year Average⁵¹

<i>Leak Cause</i>	5-Year Average for Years 2019 - 2023		Year 2024	
	<i>Main Leaks</i>	<i>Service Leaks</i>	<i>Main Leaks</i>	<i>Service Leaks</i>
Corrosion	0	0	0	0
Natural Force Damage	0	0	0	0
Excavation	2.6	15.8	2	14
Other Outside Force Damage	0	0.4	0	6
Pipe, Weld, or Joint Failure	0	0.4	0	0
Equipment Failure	0.2	23	0	72
Incorrect Operations	0	0.2	0	0
Other	0	0.8	0	0
Total	2.8	40.6	2	92

The Department notes the number of main leaks in 2024 was lower than the five-year average and the number of service leaks was significantly higher than the five-year average.

GMG is also required to provide the number of hazardous leaks by cause for mains and service as well. Table 12 (following page) summarizes that information.

⁵¹ Service Quality Metric Spreadsheet and Historical information taken from prior annual reports.

Table 12: 2024 GMG Hazardous Leak Causes Compared to Four-year Average⁵²

<i>Leak Cause</i>	5-Year Average for Years 2019-2024		Year 2024	
	<i>Main Leaks</i>	<i>Service Leaks</i>	<i>Main Leaks</i>	<i>Service Leaks</i>
Corrosion	0	0	0	0
Natural Force Damage	0	0	0	0
Excavation	2.6	15.8	2	14
Other Outside Force Damage	0	0.4	0	0
Pipe, Weld, or Joint Failure	0	0.2	0	0
Equipment Failure	0	1.2	0	0
Incorrect Operations	0	0	0	0
Other	0	0.2	0	0
Total	2.6	17.8	2	14

The Department notes that the number of hazardous main leaks for 2024 is below the five-year average and the same figure for hazardous service leaks is also below the five-year average.

Excavation damages have consistently been the leading cause of main leaks (both hazardous and non-hazardous). Excavation damages were also the leading cause of hazardous service leaks, while most non-hazardous service leaks were caused by equipment failure. The leading leak causes in 2024 are consistent with historic leading leak causes.

Table 13 summarizes the number of leaks per thousand miles of main for mains and the number of leaks per 1,000 services for services.

Table 13: Main and Services Leaks by Distance or Number of Services⁵³

<i>Unit of Measure</i>	5-Year Average for Years 2019 - 2023		Year 2024	
	<i>Main Leaks</i>	<i>Service Leaks</i>	<i>Main Leaks</i>	<i>Service Leaks</i>
Leaks/1,000 Miles	3.1	NA	2	NA
Leaks/1,000 Services	NA	4.1	NA	8.6

The Department concludes that the Company provided the required integrity management plan reporting.

B.13. Excess Flow Valves (EFVs) and Manual Shut-Off Valves

The “Notice of Gas Service Quality Reporting Requirements” included the following language regarding this topic:⁵⁴

⁵² *Ibid.*

⁵³ *Ibid.*

⁵⁴ Notice of Gas Service Quality Reporting Requirements at 9.

All Gas Utilities (except GMG, which has already completed the required outreach) shall confirm with the Commission that they have completed their EFV and manual shut-off valve outreach pursuant to the Commission's July 31, 2019, Order in Docket No. 18-41. Upon receiving confirmation from the Commission, utilities that have completed their EFV and manual shut-off valve outreach may cease annual reporting on EFVs, manual shut-off valves and related outreach in their annual service quality reports, including the reporting of EFV and manual shut-off valve data pursuant to the Commission's November 14, 2019, Order in Docket Nos. G-004/M-19-280, G-004/M-19-300, G-011/M-19-303, and G-002/M-19-305. Utilities shall continue appending their annual PHMSA reports to their service quality reports, which contains information on the number of EFVs and manual shut-off valves installed on their system.

As noted in the "Notice of Gas Service Quality Reporting Requirements," GMG has already satisfied this reporting requirement, so the Company did not provide this information in its Report.⁵⁵

B.14. MNOPS Violation Reporting

As outlined in the Commission's "Notice of Gas Service Quality Reporting Requirements," utilities are required to provide a summary of any violations cited by MNOPS along with a description of the violation and remediation in each circumstance, and a count of violations by citation code.⁵⁶

GMG reported that it did not receive any violation letters from MNOPS in 2024.²⁷

B.15. Web-Based Metrics

The "Notice of Gas Service Quality Reporting Requirements" included the following language regarding this topic:⁵⁷

Beginning in 2025, for reporting year 2024, All Gas Utilities shall report:

- The percentage of uptime of the utility's enterprise-wide website (may not be state Specific.)

GMG reported that its enterprise-wide website uptime was 99.95% or higher for the 2024 year.⁵⁸

- The percentage of uptime for web payment services ability (defined as the percentage of time that web payment services are available to some customers on utility-based platforms.)

⁵⁵ *Ibid.*

⁵⁶ Notice of Gas Service Quality Reporting Requirements at 9.

⁵⁷ *Ibid.*

⁵⁸ Petition, page 9.

GMG reported that its web payment services ability through third-party payment processing service was not able to be provided to GMG. GMG states that it did not receive any complaints from customers regarding an inability to make payments via the processor’s platform.⁵⁹

- The error rate percentage for the utility-based payment services (defined as payment processing error rate – does not include errors outside of the utility’s control such as non-sufficient funds (“NSF”), expired customer debit or credit cards, etc.)

The yearly total number of website visits to initial facing enterprise-wide website (may not be state specific.)

- The yearly number of logins via electronic customer communication platforms (to include enterprise-wide website and mobile apps, if applicable; may not be state-specific and provides combined total for all customer logins, regardless of platform.

GMG expects to report on the above information in their annual service quality reports for 2025 which will be filed on April 1, 2026.

IV. RECOMMENDATION

Based on its review and analysis, the Department recommends that the Commission accept Greater Minnesota’s 2024 *Annual Service Quality Report*.

⁵⁹ *Ibid.*

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. G022/M-25-35

Dated this 23rd day of September 2025

/s/Sharon Ferguson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Julie	Ambach	juliea@cmpa.org	Shakopee Public Utilities		255 Sarazin St Shakopee MN, 55379 United States	Electronic Service		No	M-25-35
2	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	M-25-35
3	Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company		PO Box 351 200 1st St SE Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	M-25-35
4	Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-35
5	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		No	M-25-35
6	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	M-25-35
7	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-35
8	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	M-25-35
9	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-35
10	Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	M-25-35
11	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	M-25-35
12	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-35
13	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	M-25-35

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14	Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.		7701 France Ave S Ste 600 Edina MN, 55435 United States	Electronic Service		No	M-25-35
15	Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.		823 E 7th St St. Paul MN, 55106 United States	Electronic Service		No	M-25-35
16	Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.		2377 Union Lake Trl Northfield MN, 55057 United States	Electronic Service		No	M-25-35
17	Melissa S	Feine	melissa.feine@semcac.org	SEMCAC		PO Box 549 204 S Elm St Rushford MN, 55971 United States	Electronic Service		No	M-25-35
18	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	M-25-35
19	Karolanne	Foley	karolanne.foley@dairylandpower.com	Dairyland Power Cooperative		PO Box 817 La Crosse WI, 54602-0817 United States	Electronic Service		No	M-25-35
20	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	M-25-35
21	Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-35
22	Holly	Hinman	holly.r.hinman@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	M-25-35
23	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	M-25-35
24	Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency		702 3rd Ave S Virginia MN, 55792 United States	Electronic Service		No	M-25-35
25	Deborah	Knoll	dknoll@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-35
26	Tina	Koecher	tkoecher@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	M-25-35
27	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	M-25-35
28	Martin	Lepak	martin.lepak@aeoa.org	Arrowhead Economic Opportunity		702 S 3rd Ave Virginia MN, 55792 United States	Electronic Service		No	M-25-35

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29	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	M-25-35
30	Josh	Mason	jmason@rpu.org	Rochester Public Utilities		4000 E River Rd NE Rochester MN, 55906 United States	Electronic Service		No	M-25-35
31	Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company		4902 N Biltmore Ln PO Box 77007 Madison WI, 53707-1007 United States	Electronic Service		No	M-25-35
32	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	M-25-35
33	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-35
34	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-35
35	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	M-25-35
36	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	M-25-35
37	Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	M-25-35
38	Bill	Poppert	info@technologycos.com	Technology North		2433 Highwood Ave St. Paul MN, 55119 United States	Electronic Service		No	M-25-35
39	Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024-9583 United States	Electronic Service		No	M-25-35
40	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	M-25-35
41	Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		No	M-25-35
42	Rick	Sisk	rsisk@trccompanies.com	Lockheed Martin		1000 Clark Ave. St. Louis MO,	Electronic Service		No	M-25-35

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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43	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	M-25-35
44	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-35
45	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	M-25-35
46	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	M-25-35