

July 17, 2019

Daniel P. Wolf
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. G002/M-19-305

Dear Mr. Wolf:

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

2018 Annual Natural Gas Service Quality Report submitted by Northern States Power Company, a Minnesota Corporation (Xcel or the Company).

The *2018 Annual Natural Gas Service Quality Report* (Report) was filed on May 1, 2019 by:

Gail Baranko
Regulatory Manager
414 Nicollet Mall – 7th Floor
Minneapolis, Minnesota 55401

Based on its review of Xcel's 2018 Report, the Department recommends that the Minnesota Public Utilities Commission (Commission) accept the Company's Report.

The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ DANIEL BECKETT
Public Utilities Rates Analyst

AB/ar
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. G002/M-19-305

I. BACKGROUND

On April 16, 2009, the Minnesota Public Utilities Commission (Commission) opened an investigation into natural gas service-quality standards in Docket No. G999/CI-09-409. In its August 26, 2010 *Order Setting Reporting Requirements (09-409 Order)*, the Commission established uniform reporting requirements for all regulated Minnesota gas utilities. The 09-409 *Order* prescribed a list of indicators for which data for each calendar year are to be provided by each utility in an annual report to be made by May 1.

Northern States Power Company, a Minnesota corporation (Xcel or the Company) was allowed to report commingled gas and electric statistics for mislocates and for answer times from its utility call centers. For its first report covering calendar year 2010, the Company was allowed to report a partial year of data covering October 1, 2010 and thereafter for mislocates, gas lines damaged, summaries of major events reportable to the Minnesota Office of Pipeline Safety (MnOPS), and customer-service-related operations and maintenance expenses. For events reportable to MnOPS, all utilities were ordered to notify the Commission and the Minnesota Department of Commerce (Department) simultaneously with their notice to MnOPS.

In addition to the requirements in the 09-409 *Order*, the Commission's March 6, 2012 *Order Accepting Reports and Setting Further Requirements (11-360 Order)* in Docket No. G002/M-11-360 *et. al.*, directed all regulated Minnesota gas utilities to, in future annual reports:

- Include data on average speed-of-answering calls, in addition to reporting on the percentage of calls answered within 20 seconds or less;
- Explain, in their 2011 annual reports, whether the difference between the total percentage of meters (100%) and the percentage of meters read (by both the utility and customers) is equal to the percentage of estimated meter reads;
- Explain, beginning with their 2011 annual reports, the types of extension requests (such as requests for reconnection after disconnection for non-payment) they are including in their data on service extension request response times for both locations not previously served, as well as for locations that were previously served;

- Explain, beginning with their 2011 annual reports, the types of deposits (such as new deposits from new and reconnecting customers and the total number of deposits currently held) included in the reported number of “required customer deposits;” and
- Describe, beginning with their 2011 annual reports, the types of gas emergency calls included in their gas emergency response times, as well as the types of emergency calls included in their reports to the Minnesota Office of Pipeline Safety (MOPS). Provide an explanation of any difference between the reports provided to the Commission and to MOPS.

In the 11-360 *Order*, the Commission also specifically required Xcel to, beginning in its 2011 report, explain how its gas-related call center complaints correspond with the complaint categories contained in Minn. Rules, part 7826.2000.

Further, the Commission’s November 30, 2010 *Order* in Docket No. E,G002/M-09-224 and G002/CI-08-871 included the following order point:

Direct Xcel to file the following information with its annual electric service quality reports filed pursuant to Minn. Rules, Part 7826.0500 and its annual gas service quality reports established in Docket No. G999/CI-09-409 starting in 2013:

Volume of Investigate and Remediate field orders
Volume of Investigate and Refer field orders
Volume of Remediate upon Referral field orders
Average Response Time for each of the above categories by month and year
Minimum days, maximum days, and standard deviations for each category
Volume of excluded field orders

The Commission’s April 7, 2014 *Order* in Docket No. E,G002/M-13-371 required Xcel to provide complete and accurate meter-reading data with multiple reads excluded in future reports.

The Commission’s April 12, 2019 *Order Accepting Report and Setting Additional Reporting Requirements* in Docket No. G-002/M-18-316 required Xcel to provide the following information in the Company’s 2018 report:

- a. The utility’s filing under 49 CFR 192.1007 (e): integrity management plan performance measures; monitoring results; and evaluation of effectiveness in a manner to establish a baseline for ongoing reporting.

- b. A summary of any 2018 emergency response violations cited by MnOPS along with a description of the violation and remediation in each circumstance.
- c. The number of violation letters received by the utility from MnOPS during the year in question.
- d. A discussion of how to provide ongoing monitoring and metrics towards the deployment of Excess Flow Valves and manual service line shutoff valves pursuant to the Commission’s order in Docket No. G-999/CI-18-41.

On May 1, 2019, Xcel filed its 2018 *Natural Gas Service Quality Performance Report* (Report). The Department provides its analysis of the 2018 Report below.

II. DEPARTMENT ANALYSIS

Each year, the Department analyzes the information provided in the annual report in the context of past reports. Overall, the Department identified no major concerns regarding Xcel’s 2018 Report.

The Department provides further detail on each reporting metric by discussing each separately below.

A. CALL CENTER RESPONSE TIME

Xcel reported the percentage of calls to call centers answered within 20 seconds in Attachment A of its Report, as required by the 09-409 *Order*. As the 09-409 *Order* permitted, the information reflects both natural gas and electric customer calls placed to the call centers.

As shown in Table 1 below, Xcel was able to answer 80 percent, or more, of calls within 20 seconds, with an average of 91.1 percent of calls being answered within 20 seconds in 2018.¹

Table 1: Call Center Response Time

Year	12 Mo. Avg.	Avg. Speed (Seconds)	# of calls
2010	83.0%	n/a	3,833,374
2011	86.2%	20	3,783,176
2012	89.4%	19	3,682,314
2013	89.0%	26	4,009,067
2014	90.0%	20	3,758,280
2015	90.9%	18	3,743,635
2016	89.9%	21	3,579,038
2017	90.1%	21	3,222,187
2018	91.1%	22	3,042,040

¹ Attachment A of the 2018 Report, lines 26, 31 and 22.

The Department notes that, in its November 2, 2017 *Order Approving Tariff Modifications and Granting Variance* in Docket No. E,G002/M-17-553, the Commission approved Xcel's proposed change to call center hours for non-emergency calls, and required the Company to "submit two years annual compliance review in its annual service quality reports for 2018 and 2019." While Xcel did not explicitly state that the following quoted passage regarding customers' use of its Interactive Voice Response system (IVR) and the impact of the changes to its call center operational hours was meant to be in compliance with the Commission's November 2, 2017 Order, the Department understands it as such:²

As expected, customers have continued to decrease their need to speak to an agent after hours. In fact, from January 2018 to December 2018 we saw a 30 percent decrease in the number of customers calling in after hours that prompted to speak to an agent for reasons other than outages and natural gas emergencies.

Our digital strategy has been successful with more customers leveraging self-service offers to transact business. Overall usage for our automated phone system (IVR) is up 3.9 percentage points in 2018 vs 2017. For those customers that are selecting to speak to an agent, the wait time has improved. Overall agent calls answered within 20 seconds improved 0.6 percentage points from 2017 to 2018 (Attachment A, line 30).

The Company stated that it believes part of the improvement in call response time could be attributed to its change in hours. Additionally, the Company stated that overall incoming call volume was down in 2018 by nearly 40,000 calls compared with a year prior.

The Department acknowledges that Xcel has fulfilled the requirements of the 09-409 and 11-360 *Orders*, as well as the Commission's Order in Docket No. E,G002/M-17-553.

B. METER-READING PERFORMANCE

Xcel reported the following metrics for meter-reading performance in Attachment B of its Report, and indicated that the Company included complete and accurate meter-reading data with multiple reads excluded as required by the Commission's April 7, 2014 *Order* in Docket No. E,G002/M-13-371:³

- A. the number and percentage of customer meters read by Company personnel;
- B. the number and percentage of customer meters self-read by customers;

² 2018 Report, p. 2.

³ Xcel's meter reading performance reporting includes both electric and natural gas meters.

- C. the number and percentage of customer meters that have not been read by Company personnel for periods of six to 12 months and for periods of longer than 12 months, and an explanation as to why they have not been read; and
- D. data on Company monthly meter-reading staffing levels, by work center or geographical area.

Xcel reported that an annual average of 96.94 percent of customer meters were read by utility personnel in 2018, while 0.0003 percent were read by the customer.⁴

Xcel provided the number of meters unread in 2018 for 6 to 12 months and for more than 12 months for its Residential, Commercial, Industrial, and Other customer classes.⁵ “No Reading Returned” was the most common reason across all customer classes for failure of meters to be read.

Table 2 summarizes the number of meters not read by utility personnel for more than 12 months according to Xcel’s current and past annual reports.

Table 2: Meters Not Read for Longer than 12 Months

Year	Residential	Commercial	Industrial	Other	Total
2010	1,149	366	263	71	1,849
2011	637	403	181	94	1,315
2012	661	450	112	89	1,312
2013	602	335	131	64	1,132
2014	620	304	92	68	1,084
2015	764	310	134	90	1,298
2016	551	240	109	63	963
2017	531	260	135	48	974
2018	580	481	283	44	1,388

While there was a slight uptick in 2018 regarding meters that were not read for longer than 12 months when compared with 2017, the Department notes that, generally, there has been a downward trend since 2010. The Department notes the unusual uptick in unread meters for the Commercial and Industrial rate classes and requests that Xcel explain what factors led to the increase, including whether “No Reading Returned” involves any type of equipment malfunction, or whether the numbers reflect a lack of customer action, and what Xcel plans to do to ensure compliance with Minnesota Rules, part 7820.3300.

Table 3 summarizes the number of meters not read by utility personnel for periods of six to 12 months according to Xcel’s current⁶ and past annual reports.

⁴ The Department’s calculations are based on data provided in Tables A and B, Attachment B, page 1 of the 2018 Report.

⁵ Table C-2, Attachment B, pp. 5-7 of the 2018 Report.

⁶ Table C-1, Attachment B, pp. 2-4 of Xcel’s 2018 Report.

Table 3: Meters Not Read for Periods of 6 to 12 Months

Year	Residential	Commercial	Industrial	Other	Total
2010	3,506	1,076	338	100	5,020
2011	2,346	967	244	183	3,740
2012	3,967	1,232	248	106	5,553
2013	2,600	822	177	79	3,678
2014	5,237	1,178	260	123	6,798
2015	2,508	942	387	113	3,950
2016	2,268	772	167	75	3,282
2017	1,938	1,118	306	50	3,412
2018	2,313	1,222	489	50	4,074

Xcel provided its monthly staffing levels for its four work centers and for meter readers working in western Minnesota, North Dakota and South Dakota.⁷ The Company averaged a total of 12.2 meter reading staff in 2018, compared to 12.5 in 2017.

The Department acknowledges that Xcel has fulfilled the requirements of the 09-409, 11-360, and 13-371 *Orders* regarding meter-reading performance reporting.

C. INVOLUNTARY DISCONNECTIONS

The 09-409 *Order* required the Company to provide the involuntary disconnections data that it reports under Minn. Stat. § 216B.091 and § 216B.096 (Cold Weather Rule reports).⁸

Table 4 summarizes residential customer disconnection statistics reported by Xcel:

Table 4: Residential Customer Involuntary Disconnect Information

Year	Customers Receiving Disconnect Notice	Customers Seeking CWR Protection	Customers Granted CWR Protection	% Granted	Customers Disconnected Involuntarily	Customers Restored within 24 Hours
2010	1,218,073	173,440	173,440	100%	29,592	12,121
2011	1,282,576	188,091	188,271	100%	27,120	11,273
2012	1,207,842	121,393	121,393	100%	27,132	21,780
2013	1,217,049	126,477	126,477	100%	23,493	20,142
2014	1,168,975	105,561	105,561	100%	25,532	21,860
2015	1,042,775	151,956	151,956	100%	26,657	22,452
2016	870,665	130,052	130,052	100%	20,584	17,352
2017	747,409	140,943	140,943	100%	19,212	13,182
2018 ⁹	559,011	115,472	115,472	100%	17,310	14,474

The Department acknowledges that Xcel has fulfilled the involuntary disconnection information requirements of the 09-409 *Order*.

⁷ 2018 Report, p. 4.

⁸ Docket Nos. E,G999/PR-10-02, E,G999/PR-11-02, E,G999/PR-12-02, E,G999/PR-13-02, E,G999/PR-14-02, E,G999/PR-15-2, E,G999/PR-16-2, E,G999/PR-17-2, E,G999/PR-18-2, and E,G999/PR-19-2.

⁹ The Department's calculations for 2018 are based on monthly data provided in Attachment C of the 2018 Report.

D. SERVICE EXTENSION REQUEST RESPONSE TIMES

Xcel stated in its May 18, 2009 *Comments* in Docket No. G999/CI-09-409 that nearly all requests to connect natural gas service at a location previously served are from customers who have had their meter locked due to nonpayment issues, as it is otherwise uncommon to disconnect service between tenants. Therefore, the Company included all reconnection statistics, including service upgrades involving disconnection, and reconnections to a formerly vacant address, in its reporting of requests for new service.

Table 5 below summarizes Xcel’s service extension information for new service requests.¹⁰

Table 5: Service Extension Requests

Year	Residential		Commercial	
	# of Installations	Avg. # of Days to Complete	# of Installations	Avg. # of Days to Complete
2010	2,210	6.00	16	9.00
2011	1,625	3.92	140	2.83
2012	1,388	3.00	154	3.20
2013	1,582	0.80	130	0.70
2014	2,158	1.10	223	0.90
2015	1,406	0.50	149	1.20
2016	1,760	0.70	120	1.50
2017	1,585	1.10	196	1.90
2018	1,902	6.80	88	7.55

The average number of days for completing installs that the Company reported for 2018 are significantly larger than previous years. The Company stated that 2018 was the first year service extension information was sourced from its new SAP work management system. Xcel stated that its new SAP system allowed it to design a service extension process that better captures the data points required for measuring the time from when a customer requests installation to the time when that process is completed. Further, SAP excludes instances involving reconnections to existing locations with a new occupant and where an existing service was reconnected after a service upgrade. As such, the Company stated that, going forward, the data reported in this category will not be comparable to past reports. The Department agrees with this assessment and appreciates that the reported data going forward will more accurately reflect the reporting requirement. The Department acknowledges that Xcel has fulfilled the requirements of the 09-49 and 11-360 *Orders* regarding service extension reporting.

E. CUSTOMER DEPOSITS

The reporting metric for customer deposits is the number of customers required to make a deposit as a condition of receiving service. Xcel reported 394 such accounts for both its natural gas and electric operations in 2018.¹¹

¹⁰ Attachment D of Xcel’s annual reports.

¹¹ 2018 Report, p. 5.

Table 6: Customer Deposits

Year	Deposits	% Change
2010	657	n/a
2011	665	1.22%
2012	622	-6.47%
2013	652	4.82%
2014	606	-7.06%
2015	365	-39.77%
2016	561	53.70%
2017	314	-44.03%
2018	394	25.48%

Per the 11-360 *Order*, the utilities are required to explain the types of deposits included in the reported number of “required customer deposits.” Xcel stated that it requires deposits from residential customers that have filed for bankruptcy. The Company noted that it requests these deposits upon notification of the bankruptcy and not as a condition for reconnection of service. Xcel further stated that once customers file for bankruptcy, their service is begun anew and the deposit amount is included in their first bills.

The Department acknowledges that Xcel has fulfilled the customer deposit information requirements of the 09-409 and 11-360 *Orders*.

F. DETAILED INFORMATION ABOUT CUSTOMER COMPLAINTS

The metrics addressing customer complaints include:

- A. the number of complaints received;
- B. the number and percentage of complaints alleging billing errors, inaccurate metering, wrongful disconnection, high bills, inadequate service, and the number involving service-extension intervals, service-restoration intervals, and any other identifiable subject matter involved in five percent or more of customer complaints;
- C. the number and percentage of complaints resolved upon initial inquiry, within ten days, and longer than ten days;
- D. the number and percentage of all complaints resolved by taking any of the following actions:
 - a. taking the action the customer requested;
 - b. taking an action the customer and the utility agree is an acceptable compromise;
 - c. providing the customer with information that demonstrates that the situation complained of is not reasonably within the control of the utility; or
 - d. refusing to take the action the customer requested; and

- E. the number of complaints forwarded to the utility by the Commission's Consumer Affairs Office for further investigation and action.

As shown in Table 7, Xcel reported that the Company's Customer Advocate Group (CAG) handled 664 electric and natural gas complaints in 2018, 248 of which were forwarded by the Consumer Affairs Office (CAO).¹²

Table 7: Customer Complaints Handled by CAG

Year	# Handled by CAG	# Forwarded by CAO	% Resolved on Initial Inquiry	% Resolved by Taking Customer-Requested Action	Top Complaint Category
2010	693	124	17%	29.1%	Inadequate Service
2011	627	127	13.2%	28.2%	Inadequate Service
2012	613	101	18.6%	27.2%	Inadequate Service
2013	745	94	18.9%	38.3%	Inadequate Service
2014	770	115	16.8%	51.3%	Inadequate Service
2015	789	129	14.3%	29.5%	Inadequate Service
2016	547	102	16.3%	32.7%	Inadequate Service
2017	572	113	18.0%	27.1%	Inadequate Service
2018	664	248	20.6%	26.7%	Inadequate Service

As shown in Table 8, Xcel received 624,399 complaints in 2018, the lowest number since 2011.¹³ Approximately 98 percent of these complaints were resolved by taking the action the customer requested. The complaint category with the largest volume of complaints for all customers was "billing errors" with "wrongful disconnect" and "inadequate service" additionally of significant concern to residential customers.

Table 8: Customer Complaints Handled by Xcel's Call Centers

Year	# Handled by Xcel's Call Centers	% Resolved by Taking Customer Action	Top Complaint Category
2011	877,097	95	Billing Errors
2012	806,506	96	Billing Errors
2013	802,754	96	Billing Errors
2014	796,982	96	Billing Errors
2015	797,237	96	Billing Errors
2016	736,308	97	Billing Errors
2017	665,739	96	Billing Errors
2018	624,399	98	Billing Errors

¹² Attachment E of Xcel's 2018 Report.

¹³ The complaint totals are sums of the monthly data provided in Attachment E of the 2018 Report.

Per the 11-360 *Order*, Xcel provided a chart that aligned its customer complaint categories with the ones contained in Minn. Rules, part 7826.2000.¹⁴ The majority of Xcel’s complaint categories fell within the “Billing Error” and “Inadequate Service” categories in the Rules.

The Department acknowledges that Xcel has fulfilled the customer complaint reporting requirements of the 09-409 and 11-360 *Orders*.

G. EMERGENCY CALLS SPEED OF ANSWER

The Company reported its average speed of answering emergency line calls for natural gas emergencies by month and year for all its possible sources, including the general customer service line, Business Line, Electric Outage line, and Gas Emergency Line. Xcel also reported the same information for calls directed exclusively to the dedicated Gas Emergency Line. This information is summarized in Table 9.¹⁵

Table 9: Gas Emergency Calls

Year	# of Gas Emergency Calls	Average Response Time (seconds)	# of Gas Emergency Line Calls	Average Response Time (seconds)
2011	31,232	7	16,795	8
2012	26,046	8	15,013	8
2013	27,669	17	14,431	10
2014	25,426	8	15,754	8
2015	29,064	14	18,567	14
2016	35,921	11	7,146	14
2017	43,037	7	6,995	12
2018	44,303	5	6,698	12

The number of gas emergency calls in 2018 were an all-time high since tracking from 2011. However, the Company transitioned to a different automated menu system for their Gas Emergency phone line. In its 2017 Report in Docket No. G002/M-18-316, the Company stated the following regarding the change and increase in call volume for 2017, which at the time was the highest since 2011:¹⁶

While we showed improvement over last year’s emergency gas call response time results during 2017, we continue to see an overall volume increase to our gas line. The menu change to our automated system, which became effective on May 19, 2016, continues to impact our total gas line call volume now that gas (vs. electric) is the first prompt on the main menu. In comparison, the volume levels to the toll-free “gas only” line continue to decrease.

¹⁴ Attachment E1 of Xcel’s 2018 Report.

¹⁵ Attachment G of Xcel’s 2018 Report.

¹⁶ 2017 Report, p. 6.

As reported last year, we predicted the new menu structure would continue to create a higher than normal call volume to our gas line due to callers choosing option 1 either in error, out of habit or with the expectation of having their calls answered quickly for faster assistance. With the change in operational hours, which became effective January 1, 2018, customers who prompt into the gas emergency line with non-electric outage or non-gas related issues during business hours those calls will continue to be handled by our Agents. During non-business hours, customers will be immediately notified that the gas line needs to be kept open for gas related emergencies and will then be redirected. We expect that over time this procedural change will eventually affect customer actions toward selecting the appropriate prompt options, which will help reduce the number of “miss-prompt calls” from the volume totals.

The Department acknowledges that Xcel has fulfilled the gas emergency calls reporting requirements of the 09-409 *Order*.

H. EMERGENCY GAS RESPONSE TIMES

The Company also reports the response time associated with emergencies requiring a physical presence at the site of the emergency. This metric is the length of time from the initial notification of an emergency to the point that qualified emergency response personnel arrives at the location of the incident. Xcel reported emergency response times by job code and total calls, by calls responded to within one hour or less, and calls responded to in more than one hour. Xcel also provided the average number of minutes necessary for response to an emergency. The Company’s emergency gas response time data are summarized in Table 10.¹⁷

Table 10: Gas Emergency Response Times

Year	# of Gas Emergency Calls	Average Response Time (minutes)	% of Calls Answered in an Hour or Less
2010	18,557	51.77	76%
2011	16,417	44.88	80%
2012	11,028	40.30	84%
2013	13,801	41.73	83%
2014	14,548	40.00	85%
2015	13,587	38.13	87%
2016	12,811	36.82	88%
2017	13,230	38.35	87%
2018	13,500	35.92	92%

¹⁷ Attachment I of 2018 Report.

The Department notes that Xcel has improved its average response time over the years since 2010, with 2018 seeing the quickest time to respond at just under 36 minutes. In the 11-360 *Order*, all gas utilities were required to describe the types of gas emergency calls included in their gas emergency response times, as well as the types of emergency calls included in their reports to MnOPS. The utilities were also required to provide an explanation of any difference between the reports provided to the Commission and those provided to MnOPS. Xcel has included the MnOPS Emergency Response Reporting Form for 2018 in Attachment H of its Report. In 2018, there were 10,682 calls that were reportable to MnOPS.¹⁸

The Department acknowledges that Xcel has fulfilled the gas emergency response time reporting requirements of the 09-409 and the 11-360 *Orders*.

I. MISLOCATE RATE

The mislocate rate refers to the number of times that a gas line is damaged due to a line being mismarked or unmarked. The required reporting metric is the total number of mislocates. The Company also provided the number of locate tickets and the number of mislocates per 1,000 locate tickets. Xcel's mislocate data are summarized in Table 11.¹⁹

Table 11: Mislocates

Year	# of Mislocates	# of Locate Tickets	Mislocates per 1,000 Tickets
2012	54	160,832	0.34
2013	57	155,531	0.37
2014	43	167,578	0.26
2015	46	179,362	0.26
2016	41	171,455	0.24
2017	44	177,703	0.25
2018	36	185,760	0.19

The Department acknowledges that Xcel has fulfilled the mislocate reporting requirements of the 09-409 *Order*.

¹⁸ Attachment H, p. 1 of 2018 Report.

¹⁹ Attachment J of 2018 Report.

J. GAS SYSTEM DAMAGES

The metric concerning gas system damage indicates the number of incidents caused by Company employees and contractors, or other sources. Xcel's system damage data are summarized in Table 12.²⁰

Table 12: Damaged Gas Lines

Year	Damage by Xcel	Damage by Others	Total	Miles of Main	Damage/100 Main Miles
2011	27	308	335	8,785	3.81
2012	81	254	335	8,924	3.75
2013	87	253	340	8,942	3.80
2014	77	238	315	8,942	3.52
2015	91	229	320	9,238	3.46
2016	71	271	342	9,292	3.68
2017	66	170	236	9,374	2.52
2018	63	184	247	9,455	2.61

The Company reported a rate of 0.67 damage incidents caused by Xcel or contractors per 100 miles of main and 1.95 damage incidents from other causes per 100 miles of main in 2018.

The Department acknowledges that Xcel has fulfilled the system damage information requirements of the 09-409 *Order*.

K. NATURAL GAS SERVICE INTERRUPTIONS

The reporting metrics for natural gas service interruptions are the number of firm customers that experience an unplanned service interruption and the average duration of the event. Unplanned service interruptions are those due to Xcel employees and contractors, or other unplanned causes. Summarized in Table 13 are Xcel's service interruption data.

Table 13: Gas Service Interruption

Year	Number of Homes Affected	Number of Incidents Caused by Xcel	Average Duration of Outages Caused by Xcel (hours:minutes)	Number of Incidents Caused by Others	Average Duration of Outages Caused by Others (hours:minutes)
2011	2,130	31	5:39	249	3:50
2012	473	25	2:30	254	1:46
2013	621	26	1:43	238	2:00
2014	1,023	18	2:29	248	2:22
2015	715	32	1:55	263	1:57
2016	606	25	1:34	252	1:50
2017	401	19	0:58	161	1:39
2018	904	32	0:28	408	0:13

In 2018, 904 homes were affected by 440 gas service interruptions.²¹ Additionally, 32 outages affecting 44 homes were caused by Xcel employees and contractors, compared with 408 outages affecting 860 homes occurring due to other causes in 2018.

²⁰ Attachment K of 2018 Report.

²¹ Attachment L of Xcel's 2018 Report.

The average duration of gas-service interruptions in 2018 was 28 minutes for outages associated with Xcel employees and contractors, and 13 minutes for the outages due to other causes. While 2018 saw an increase in number of service interruptions by both Xcel and its contractors, as well as other causes, the average time a customer was affected was lower when compared with previous years.

The Department acknowledges that Xcel has fulfilled the natural gas service interruption data requirements of the 09-409 *Order*.

L. MnOPS SUMMARIES

The Company is required to summarize major events that require a report being made to the MnOPS. These summaries include the ten items that the MnOPS requires in its incident reports. They are:

- 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; and
- the longest any customer was without gas service during the incident.

Xcel reported 26 such major events during 2018.²² The Company provided a table of data concerning major incidents, which includes all ten items required by MnOPS.

The Department acknowledges that Xcel has fulfilled the requirements of the 09-409 *Order* regarding major events reported to MnOPS.

M. CUSTOMER-SERVICE-RELATED EXPENSES

The customer-service-related expenses reporting metric is the total operation and maintenance (O&M) expenses incurred related to customer service. The 2018 Report included expenses for operations in Xcel's Minnesota jurisdiction, as well as the total for Northern States Power Company (which includes North Dakota expenses). Table 14 below summarizes Xcel's reported customer-service expenses for its Minnesota jurisdiction.²³

²² Attachment M of Xcel's 2018 Report.

²³ Attachment N of Xcel's 2018 Report.

Table 14: Customer-Service Expenses: Minnesota Jurisdiction

Year	FERC 901 and 903	Associated Payroll & Tax Benefits	Total
2010	\$5,612,215	\$396,149	\$6,008,364
2011	\$5,927,900	\$391,843	\$6,319,743
2012	\$5,896,206	\$436,123	\$6,332,329
2013	\$5,799,728	\$431,478	\$6,231,206
2014	\$5,617,750	\$374,554	\$5,992,304
2015	\$5,424,808	\$388,260	\$5,813,068
2016	\$5,317,939	\$381,388	\$5,699,327
2017	\$5,034,393	\$388,921	\$5,423,314
2018	\$4,609,709	\$382,521	\$4,992,230

The Department acknowledges that Xcel has fulfilled the O&M expense reporting requirements of the 09-409 *Order*.

N. COMMISSION ORDER IN THE MATTER OF AN INVESTIGATION INTO XCEL'S INACCURATE GAS METERS, RECALCULATION OF BILLS, AND RELATED ISSUES (DOCKET G002/CI-08-871)

As indicated above, Xcel is required to provide certain data regarding meter repair field orders, which have traditionally been provided for both electric and gas service in Xcel's annual electric service quality dockets. Xcel's meter equipment malfunction data are summarized in Table 15.²⁴

Table 15: Meter Equipment Malfunction

Year	# of Orders for Gas Meter Equipment Malfunctions	Average Days to Resolve	# of Exclusions for Meter Access issues
2012	2,891	2.97	365
2013	3,286	3.07	608
2014	3,376	3.43	613
2015	2,956	2.94	533
2016	3,966	3.36	399
2017	3,638	3.67	466
2018	3,670	4.05	515

The Department acknowledges that Xcel has fulfilled the requirements of the 08-871 *Order*.

O. ADDITIONAL REPORTING REQUIREMENTS

The Commission's April 12, 2019 Order in Docket No. G002/M-18-316 required the Company to provide the following information in addition to that which is required in its annual service quality report.

²⁴ Attachment O of Xcel's 2018 Report.

- A. The utility's filing under 49 CFR 192.1007 (e): integrity management plan performance measures; monitoring results; and evaluation of effectiveness in a manner to establish a baseline for ongoing reporting.*

The Company included this information in Attachment P of its 2018 Report. On May 31, 2019, the Company provided a supplemental filing in compliance with this Order point, which included an updated Table 1 on page 10 of its 2018 Report. The updated Table 1 included information for both 2017 and 2018 regarding Mains and Services for the Number of Hazardous Leaks Either Eliminated or Repaired.

- B. A summary of any 2018 emergency responsive violations cited by MNOPS along with a description of the violation and remediation in each circumstance.*

In compliance with this ordering point, the Company stated that it did not receive any emergency response violations cited by MNOPS in 2018.

- C. The number of violation letters received by the utility from MnOPS during the year in question.*

The Company stated that it received ten violation letters related to Minnesota Statute 216D for locating issues in 2018. The Company stated the following regarding the violation letters it receives and its processes surrounding the issues:²⁵

Violation letters are typically triggered by a MnOPS inspection, damage that occurred in the field, or a complaint from an excavator. MnOPS conducts a variety of inspections including construction sites and our control center. Upon receipt of a MnOPS violation letter, the Company is given a set amount of time (determined by MnOPS) to provide a response outlining a remediation plan or other steps taken to remediate the violation. MnOPS closes these items with either a letter or a verbal notification. Annually, the Company staff meets with MnOPS to review the incidents that occurred in the previous year and their disposition.

- D. A discussion of how to provide ongoing monitoring and metrics towards the deployment of Excess Flow Valves and manual service line shutoff valves pursuant to the Commission's order in Docket No. G-999/CI-18-41.*

The Company stated that it does not have a program in place to install Excess Flow Valves (EFVs) or manual shut-off valves as a service in itself, but rather installations occur on a case-by-case basis when new service lines are installed, existing service lines are repaired or replaced, or a customer requests installation. In its December 18, 2018 Compliance Filing in Docket No. G999/CI-18-41, the Company stated the following regarding the matter:²⁶

²⁵ 2018 Report, p. 10.

²⁶ Compliance Filing, p. 4.

The Company does not currently have specific plans for replacing all services throughout the Company's service territory. There are similar projects to replace problematic service as a part of our Gas Utility Infrastructure Cost (GUIC) Rider initiative, but this programmatic approach targets the replacement of legacy poor performing pipelines. The Company deems a main or service line to be poor performing through analysis of performance as well as monitoring industry trends and issues. The Company monitors and reviews the leak history of pipe material types and/or year of installation. Trends of increasing leak ratio or risks associated with certain pipe types are studied to prioritize the replacement of lines under the GUIC. It may take several decades to replace all services that do not currently have an EFV.

In addition to the brief discussion provided in the instant filing, the Company provided the following two tables regarding installation statistics on EFV and manual service shut-off valves by customer class.²⁷

Table 16: EFV Installation by Customer Class²⁸

Customer Class	Number of Customers Suitable for EFV	Number of Installed EFVs	Percentage of Suitable Customers with EFVs	Number of Customers Unsuitable for EFV
Residential	365,911	138,891	37.96%	65,315
Commercial	16,137	4,879	30.23%	15,650
Industrial	79	25	31.65%	324
Municipal	227	52	22.91%	325
Unassigned	1	0	0.00%	0
Total	382,355	143,847	37.62%	81,614

Table 17: Manual Service Shut-Off Valve Installation by Customer Class²⁹

Customer Class	Number of Customers Suitable for Shut-off Valve	Number of Installed Shut-off Valves	Percentage of Suitable Customers with Shut-off Valves
Residential	65,315	108	0.17%
Commercial	15,650	133	0.85%
Industrial	324	4	1.23%
Municipal	325	6	1.85%
Total	81,614	251	0.31%

²⁷ The Department notes that these statistics are the same as those that were reported by the Company in its December 18, 2018 Compliance Filing in Docket No. G999/CI-18-41.

²⁸ Customers who do not fall under the installation requirements of 49 CFR § 192.383 are considered unsuitable for EFV in this table.

²⁹ The Company stated that it is aware of more lines with manual shut-off valves than the amount reported here. The figures in the table reflect the number of valves that have maintenance records verifying they are operational.

The Department acknowledges that the Company complied with the Commission's April 12, 2019 Order in Docket No. G002/M-18-316. The Department notes that, at the Commission's July 1, 2019 Agenda Meeting, the Commission required the natural gas utilities to submit annual compliance reports on progress made towards complying with Ordering Paragraph 7a-c of the Commission's August 20, 2018 Order in Docket No. G999/CI-18-41, *in the Matter of a Commission Investigation into Natural Gas Utilities' Practices, Tariffs and Assignment of Cost Responsibility for Installation of Excess Flow Valves and other Similar Gas Safety Equipment*. Therefore, it may no longer be necessary for the utilities to provide the same information in their annual service quality reports.

III. DEPARTMENT RECOMMENDATIONS

Based on its review of Xcel's 2018 *Annual Natural Gas Service Quality Report*, the Department recommends that the Commission accept the 2018 Report.

Further, the Department recommends that the Commission continue to require MERC to report the information outlined in item 3 of the Commission's April 12, 2019 *Order* in Docket No. G002/M-18-3167, with the following amendments:

- a. based on the utility's filing under 49 CFR 192.1007 (e) and the baseline information provided on May 1, 2019, an update of: integrity management plan performance measures; monitoring results; and evaluation of effectiveness ~~in a manner to establish a baseline for ongoing reporting.~~
- b. a summary of any [2019] emergency response violations cited by MNOPS along with a description of the violation and remediation in each circumstance.
- c. the number of violation letters received by the utility from MNOPS during the year in question.
- d. ~~a discussion of how to provide ongoing monitoring and metrics towards the deployment of Excess Flow Valves and manual service line shutoff valves pursuant to the Commission's order in Docket No. G 999/CI 18 41.~~

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. G002/M-19-305

Dated this **17th** day of **July 2019**

/s/Sharon Ferguson

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