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February 11, 2016

VIA ELECTRONIC FILING

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

Re: **Reply Comments**
Docket No. G022/M-15-1090

Dear Mr. Wolf:

Attached hereto, please find a Greater Minnesota Gas, Inc.'s Reply Comments for filing in the above-referenced docket.

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

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

Sincerely,

GREATER MINNESOTA GAS, INC.

/s/

Kristine A. Anderson

Enclosure

cc: Service List

CERTIFICATE OF SERVICE

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

**Greater Minnesota Gas, Inc.'s Reply Comments
Docket No. G022/M-15-1090**

filed this 11th day of February, 2016.

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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.	202 S. Main Street Le Sueur, MN 56058	Electronic Service	No	OFF_SL_15-1090_M-15-1090
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_15-1090_M-15-1090
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_15-1090_M-15-1090
Brian	Gardow	bgardow@greatermngas.com	Greater Minnesota Gas, Inc.	PO Box 68 Le Sueur, MN 56058	Electronic Service	No	OFF_SL_15-1090_M-15-1090
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.	202 South Main Street P.O. Box 68 Le Sueur, MN 56058	Electronic Service	No	OFF_SL_15-1090_M-15-1090
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_15-1090_M-15-1090
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.	PO Box 68 202 South Main Street Le Sueur, MN 56058	Electronic Service	No	OFF_SL_15-1090_M-15-1090
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_15-1090_M-15-1090
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_15-1090_M-15-1090

STATE OF MINNESOTA

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
Matt Schuerger	Commissioner
John Tuma	Commissioner

MPUC Docket No. G022/M-15-1090

In the Matter of Greater Minnesota
Gas Inc.'s Proposal for Revised Reporting
Metric Regarding Service Extensions
for Annual Service Quality Reporting

REPLY COMMENTS

OVERVIEW

Greater Minnesota Gas, Inc. ("GMG") respectfully requests that its Proposal for Revised Reporting Metric Regarding Service Extensions for Annual Service Quality Reporting, as amended by these Reply Comments, be approved as implemented beginning with reporting for the 2016 calendar year. GMG submitted its proposal on December 31, 2015. On February 1, 2016, the Minnesota Department of Commerce, Division of Energy Resources ("Department") filed Comments of the Minnesota Department of Commerce Division of Energy Resources ("Comments") in response to GMG's Proposal. This submission constitutes GMG's Reply to the Department's Comments.

ISSUE SUMMARY

GMG appreciates the Department's consideration and analysis of its proposal. GMG welcomes the opportunity to respond to the Department's Comments and observations, discuss the Department's recommendations, and provide additional information as requested by the Department. GMG's Reply Comments address the following areas:

- Inclusion of customer estimation, customer class, and temporal information in reporting data regarding new main extensions.
- Inclusion of customer class and temporal information in reporting data regarding service extensions on existing main.
- Reporting service extension time for previously served locations as an average.

DISCUSSION IN REPLY

GMG and the Department share the common goal of identifying metrics that will measure GMG against itself to assist the Commission with its oversight responsibilities for ensuring that GMG customers are receiving timely gas service installation. GMG is confident that, given the amended proposed reporting metrics contained herein, the Department's Comments and concerns have been addressed. GMG believes that the proposed reporting metrics, as amended in recognition of the Department's questions and observations, provide metrics that are both appropriate to GMG's service model and to providing the ability for year-over-year comparative analysis.

In its background discussion, the Department reflected on the service extension reporting table that GMG included in its second annual service quality report for the 2011 calendar year; and, in various GMG annual service quality dockets, the Department has discussed using that same model for reporting. GMG appreciates the Commission's consideration of different service extension reporting metrics, as the 2011 calendar year reporting table does not fit GMG's service extension model any longer. GMG's 2011 service extensions were minimal and such that each had a discrete date for sale of the service and installation of the service. Thus, identifying specific customer and temporal information was possible. However, as the Commission and the Department are aware, GMG's service extension deployment has substantially changed. GMG's commitment to providing safe, reliable, affordable natural gas access to unserved areas has resulted in GMG fielding requests from communities all over Minnesota. Often, GMG works with the communities over a period of many months—and even over a period of multiple years—to try to meet their needs. As a result, there are not discrete dates for services being sold and installed. GMG representatives work with customers over the course of the entire project development and thereafter. Hence, there is not a means to clearly define the interval between a service request and service installation. Discord between GMG's attempts to provide meaningful service extension information and the Department's desire for measurable comparative data has occurred in GMG's more recent annual service quality dockets. Therefore, GMG requested the opportunity to seek revised service extension reporting requirements and it appreciates that this docket affords it that opportunity.

1. GMG Agrees to Provide Data for New Main Extensions that Includes Total Customer Information by Class and Temporal Information.

As noted by the Department, GMG proposed to report the number of new geographic areas served during a calendar year, along with the number of new geographical areas that were promised service during a calendar year but that did not ultimately receive service and explanatory information as to why service was not extended. The Department opined that it might be appropriate for GMG to also provide information regarding the estimated and actual number of customers served by each main extension project. GMG considered the Department's request and determined that it does have the ability to report data for each new main extension project that contains the estimated number of customers to be served by the project and the actual number of customers connected on the project, broken down by customer class categories of residential customers, firm commercial customers, and interruptible commercial customers.

The Department also suggested that for new main extensions, service extension response time could be measured based on the date that the main installation is complete. In response, GMG proposes that it report the date that the main installation was complete for each new main extension area along with the date that the service installations were complete. Overall, GMG proposes that it report service extension data for new main extension projects in the following manner:

New Main Extension Projects								
Area Served*	Estimated # of Residential Customers to Be Served	Actual # of Residential Customers Served	Estimated # of Firm Commercial Customers to Be Served	Actual # of Firm Commercial Customers Served	Estimated # of Interruptible Commercial Customers to Be Served	Actual # of Interruptible Commercial Customers Served	Date Main Installation Complete	Date Service Installation Complete

* Areas that were promised service during the calendar year but did not receive service and explanatory information for each is provided in narrative form below.

2. GMG Agrees to Provide Data for Service Extensions Along Existing Main that Includes Customer Class and Temporal Information.

GMG proposed that it would report data reflecting the number of new on-main customers served during the calendar year, along with the number of on-main customers who requested but were denied service during the calendar year and explanatory information as to why service was not extended. The Department inquired about the extent to which GMG can also provide some temporal and customer class information. GMG believes that it can provide the number of orders for new service received for each month (broken down by customer class categories of residential customers, firm commercial customers, and interruptible commercial customers) and the average number of days taken to install service for each group. Accordingly, GMG proposes that it report service extension data for customers along existing main in the following manner:

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Service Extensions Along Existing Main							
	# of Residential Service Requests	Average # of Days to Install	# of Firm Commercial Service Requests	Average # of Days to Install	# of Interruptible Commercial Service Requests	Average # of Days to Install	# of Customers With Denied Service Requests*
January							
February							
March							
April							
May							
June							
July							
August							
September							
October							
November							
December							
* Explanatory information for service request denials is provided in narrative form below.							

3. GMG Will Report Service Extension Intervals for Customers Requesting Service to a Location Previously Served as an Average.

GMG proposed that it provide information regarding the number of customers requesting service to a location previously served by it but not served at the time of the request, along with the service extension interval. The Department inquired as to whether the service extension interval would be reported for each such customer or as an average. GMG proposes that it be reported as an average number.

REQUEST FOR COMMISSION ACTION

GMG remains confident that its proposed reporting metrics for the service extension component of its Annual Service Quality Report meet the needs of the Commission and the Department and contain attainable data by GMG. Hence, GMG respectfully requests that the Commission approve its proposed reporting metrics, requiring GMG to report the following in the Service Extension section of its Annual Service Quality Report beginning with data for the 2016¹ calendar year:

¹. GMG notes that its original filing in this docket proposed utilizing the new reporting requirements beginning with the 2015 calendar year. Given the revisions that GMG is proposing in response to the Department’s Comments, GMG will need to change how certain information is collected. Some of the proposed data may not be able to be readily retroactively accumulated

- New main extension project service extension data as reflected in the table contained in Section 1 herein.
- Service extensions along existing main data as reflected in the table contained in Section 2 herein.
- Number of customers requesting service to a location previously served by the utility but not served at the time of the request, along with the average service extension interval.
- Number of complaints specifically related to delays in extending service, along with explanatory information regarding the nature of the delay and resolution.

Dated: February 11, 2016

Respectfully submitted,

/s/

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202 S. Main Street
Le Sueur, MN 56068
Phone: 888-931-3411

for the 2015 calendar year. If the Commission approves the new reporting metrics, GMG will provide as much of the data as it can in its 2015 report and will specifically discuss what cannot be included.