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May 1, 2025

VIA ELECTRONIC FILING

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101

PUBLIC DOCUMENT
PRIVATE DATA ON INDIVIDUALS
HAS BEEN EXCISED

Re: In the Matter of the Annual Service Quality Report for Minnesota Energy Resources Corporation for 2024
Docket No. G011/M-25-34

Dear Mr. Seuffert:

Enclosed for filing is Minnesota Energy Resources Corporation's ("MERC's") 2024 Gas Service Quality Report. In compliance with the Commission's December 22, 2023 Order in Docket No. G011/M-23-80, MERC is filing a Microsoft Excel version of its 2024 Gas Service Quality report data concurrently.[1]

The nonpublic version of this filing contains private data on individuals. In particular, Attachments 9-A and 10 include customer addresses. This information is maintained by MERC as private customer data and has been excised from the public version of the filing in accordance with Minn. Stat. § 13.679.

Please contact me at (414) 221-4208 or Joylyn.HoffmanMalueg@wecenergygroup.com if you have any questions.

Sincerely,

Joylyn C. Hoffman Malueg

Joylyn C. Hoffman Malueg
Senior Project Specialist
Minnesota Energy Resources Corporation

Enclosures
cc: Service List

[1] The Commission's December 22, 2023 Order required that data in future reports be submitted in a machine-readable format.

STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Audrey Partridge	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

In the Matter of the Annual Service Quality Report for Minnesota Energy Resources Corporation for 2024	Docket No. G011/M-25-34

2024 ANNUAL SERVICE QUALITY REPORT

Minnesota Energy Resources Corporation ("MERC" or the "Company") submits this Gas Service Quality Report for 2024 in compliance with Minn. R. Ch. 7826 and various orders issued by the Minnesota Public Utilities Commission (the "Commission").[2] This 2024 Gas Service Quality Report provides required information on:

A. Pipeline and Hazardous Materials Safety Administration ("PHMSA") Gas Distribution Reports
B. Call Center Response Times
C. Meter Reading Performance
D. Involuntary Service Disconnections
E. Service Extension Requests
F. Customer Deposits
G. Customer Complaints
H. Gas Emergency Phone Line Answer Times
I. Gas Emergency Response Times
J. Excavation Damages
K. Service Interruptions

[2] On December 22, 2023, the Commission issued an Order modifying gas service quality reporting requirements based on the recommendations made by the Natural Gas Working Group in Docket No. G002, G022, G004, G011, G008/CI-22-548 and authorized the executive secretary to establish a comprehensive list of gas service quality reporting requirements for the gas utilities to work from in future reporting. That list was issued on February 2, 2024 in Docket No. G002, G022, G004, G011, G008/CI-22-548 and is the basis for this 2024 Gas Service Quality Report. Details regarding the Commission orders establishing the current gas service quality reporting requirements are set forth in the February 2, 2024 filing. The Commission's subsequent December 26, 2024 Order in Docket No. G011/M-24-34 also required that all gas utilities, except Greater Minnesota Gas, report the number of customers whose service was interrupted and the average duration of interruptions as part of their service interruption reporting requirements, which MERC had already been reporting in accordance with the modified list of reporting requirements.

L. Major Incident Reporting on Minnesota Office of Pipeline Safety ("MNOPS") Reportable Events
M. Integrity Management Plan Reporting
N. Excess Flow Valve and Manual Shut-Off Valve Outreach
O. MNOPS Emergency Response Violations and Violation Letters
P. Web-Based Metrics

In compliance with the Commission's December 22, 2023 Order in Docket No. G011/M-23-80, MERC is filing its 2024 Gas Service Quality data in excel format, providing data in monthly intervals such as monthly totals or monthly averages, as well as an annual value such as an annual total or annual average.

MERC respectfully requests that the Commission accept the Company's 2024 Gas Service Quality Report. Each of the service quality metrics are described and analyzed below.

A. PHMSA Gas Distribution Reports

Each utility is required to append their PHMSA Gas Distribution report to their annual Gas Service Quality Report.

MERC Response: The required information is provided in Attachment 1.

B. Call Center Response Time

MERC is required to report:

- The percentage of calls answered within 20 seconds as described in Minn. Rules, part 7826.1200,[3] and
- The average time required to answer an incoming call.[4]

MERC Response: The required information is provided in Attachment 2. As shown in Attachment 2 and Table 1 below, MERC's average call response time for 2024 was 12 seconds for customer service calls. This was a decrease relative to 2023 which had an average response time of 19 seconds. During 2024, call volumes decreased 29.2%, from 253,803 calls in 2023 to 179,586 in 2024, contributing to the decrease in average call response time. The percentage of calls answered within 20 seconds or less increased to 92% in 2024 from 85% in 2023.

[3] August 26, 2010 Order in Docket No. G999/CI-09-409.
[4] March 6, 2012 Order in Docket Nos. G002/M-11-360, G-001/M-11-361, G-004/M-11-363, G-007,011/M-10-374, G-008/M-10-378, and G-022/M-11-356.

Table 1: Average Call Center Response Times 2010 – 2024

Year	Average Response Time	% of Calls Answered in 20 Seconds or Less
2010	17 seconds	81
2011	18 seconds	80
2012	20 seconds	82
2013	19 seconds	81
2014	36 seconds	75
2015	28 seconds	79
2016	38 seconds	81
2017	15 seconds	84
2018	20 seconds	79
2019	22 seconds	77
2020	13 seconds	84
2021	18 seconds	81
2022	16 seconds	82
2023	19 seconds	85
2024	12 seconds	92

C. Meter Reading Performance Data

Pursuant to Minn. R. 7826.1400, the annual service quality report must include a detailed report on the utility's meter-reading performance, including for each customer class and for each calendar month:

A. the number and percentage of customer meters read by utility personnel;

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

C. 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 of longer than 12 months, and an explanation as to why they have not been read; and

D. data on monthly meter-reading staffing levels, by work center or geographical area.

In its March 6, 2012, Order Accepting Reports and Setting Further Reporting Requirements issued in Docket No. G007,011/M-10-374, the Commission also requested utilities to explain in their annual reports whether the difference between the total percentage of meters (100%) and the percentage of meters read (by both the utility and the customers) is equal to the percentage of estimated meter reads. The Commission also required MERC to provide meter reading statistics associated with its farm tap customers.

MERC Response: The required meter reading performance information is provided both with and without farm tap customers in Attachment 3.

In 2024, the percentage of meters read (by both the utility and the customers) was equal to 96.5%. Of the total percentage of meters not read by either the Company or customers (3.5%), estimated meter reads in 2024 accounted for 0.6% of total meters.

MERC does everything possible to avoid estimated meter reads; however, with a 3-day meter-reading window for each billing cycle, sometimes estimated reads are required. MERC's deployment of advanced metering infrastructure ("AMI") was largely completed in 2023,[5] and in 2024, MERC continued to implement refinements to ensure the highest number of meters are read each month. Most notably, the Company deployed cellular encoder receiver transmitters ("ERTs") in areas where network ERT coverage is less than optimal.[6] Estimated meter reads do sometimes occur when an ERT fails to communicate or there are issues with the communications network. Such issues are normal during a wide-scale AMI project. In 2024, estimated meter readings were not the result of insufficient internal and contract meter readers but rather, due to other circumstances. MERC's 2024 meter reading performance has continued to be strong and is consistent with prior reporting years with well below one percent of meters not being read over six months.[7]

Consistent with MERC's past annual service quality reports, Attachment 3A to this 2024 Gas Service Quality Report accounts for meter reading staffing based on payroll time charged to meter reading for MERC employees and full-time-equivalent ("FTE") staffing for MERC contract meter readers.[8]

For 2024, time charged to meter reading remained approximately the same as 2022 and 2023, as reflected in Table 2, below. MERC notes that there will continue to be the need going forward to conduct manual meter reads due to the situations explained above, such as equipment failure.

Table 2: Meter Reader FTE 2015 – 2024

Year	FTE Meter Readers (internal and contract)
2015	32.50
2016	31.47
2017	30.72

[5] A small number of meters remained to be converted to AMI at the end of 2023 due to supply chain, equipment, and locational issues. MERC converted those remaining meters to AMI in 2024.
[6] A small number of cellular ERTs remained to be deployed at the end of 2024 due to supply chain issues. MERC anticipates that remaining cellular ERTs will be deployed in 2025.
[7] As described in Commission Staff Briefing Papers in Docket No. G011/M-23-80, when reporting total meters unread for 6-12 months and more than 12 months, meters may be counted more than once if they remain unread across multiple months.
[8] As shown in Attachment 3A, MERC utilizes internal resources to conduct meter reads. MERC does not have any full time meter reader positions but internal employee time is charged to meter reading to conduct manual meter reads.

Year	FTE Meter Readers (internal and contract)
2018	32.92
2019	35.84
2020	22.75
2021	4.02
2022	1.77[9]
2023	2.05
2024	1.78

D. Involuntary Service Disconnections

The Commission's December 22, 2023 Order in Docket No. G002, G022, G004, G011, G008/CI-22-548 required that all gas utilities must append their December Residential Customer Status Reports[10] in their annual Service Quality reports. Gas utilities shall also provide a narrative explanation of their involuntary service disconnections performance, as needed, including steps taken to improve performance in the future.

MERC Response: The required information is provided in Attachment 4.

As discussed in MERC's previous Gas Service Quality Reports, MERC temporarily suspended disconnection activity during the transition to its Improved Customer Experience ("ICE") system and during the period of system stabilization. As a result, MERC's 2016 disconnection rates were lower than prior years. The suspension of credit and collection activities during a customer information system conversion is common practice. In particular, the primary focus following conversion and during system stabilization is to ensure the ability to bill customers accurately and in a timely manner, and to respond to customer calls and inquiries. As those systems stabilize, credit and collection activities are reinitiated. MERC reinitiated its disconnection process in the latter part of 2016 and, as shown in Table 3, below, 2017 disconnection rates increased from 2016 levels. In 2018 and continuing into 2019, disconnections returned to being more in line with historic levels.

In 2020 and continuing into 2021, because of the COVID-19 pandemic and suspension of Residential disconnections, the number of disconnections were substantially lower than previous years. All Residential disconnections were suspended in March 2020 and, in accordance with the Commission's May 26, 2021, Order Adopting Broad Transition Plan Proposal, Suspending Negative Reporting, and Establishing Notice and Communication Requirements, in Docket No. E, G-999/CI-20-375, MERC continued the suspension of Residential disconnections through August 2, 2021. Additionally, MERC continued to suspend disconnections of customers with past due balances who had a pending application or were deemed eligible for LIHEAP/EAP assistance through May

[9] During the transition to AMI, some meter reading activities were charged to the AMI deployment project and not to meter reading staffing, resulting in a lower FTE meter reader reporting in this period.
[10] To include data for January through December, as filed in Docket No. E,G-999/PR-YY-02.

31, 2022.[11] The Company resumed collection and disconnection activities on August 2, 2021 and continues to work with customers to address arrears, establish affordable payment plans, and provide information regarding access to available funding.

Table 3: Residential Disconnections (2011-2024)

Year	Disconnection Notices Sent	# of CWR requests	% of CWR Granted[12]	Involuntary Disconnects	% Restored in 24 Hours[13]
2011	62,880	4,678	100%	7,944	51.86%
2012	55,611	5,407	100%	6,358	90.42%
2013	71,491	6,058	100%	8,487	81.34%
2014	87,069	7,014	100%	6,801	88.08%
2015	71,061	8,748	100%	5,393	n/a[14]
2016	2,690	4,649	100%	632	0.79%
2017	37,208	8,751	100%	1,744	1.83%
2018	58,151	10,014	100%	3,438	1.75%
2019	55,276	8,693	100%	4,961	0.89%
2020	15,805	1,433	100%	338	26.33%
2021	7,684	414	100%	812	00.00%
2022	34,262	1,963	100%	4,427	00.29%
2023	61,729	3,361	100%	5,155	4.48%
2024	46,572	1,907	100%	3,882	8.63%

E. Service Extension Requests

Each utility shall report the service extension request response time data contained in Minn. R. 7826.1600 (A)-(B), except that data reported under Minn. Stat. §216B.091 and 216B.096, subd. 11 is not required. Additionally, the Commission's March 6, 2021, Order in Docket No. G007,011/M-10-374 required the utilities to explain the types of extension requests for both locations previously served and not previously served.

[11] The Commission's November 9, 2021 Order Temporarily Suspending Disconnections, with Conditions, to RentHelpMN Applicants also approved suspension of disconnections through April 30, 2022 for customers who have applied for RentHelpMN assistance.

[12] As described in MERC's October 4, 2024 Reply Comments in Docket No. G011/M-24-34, historically, MERC has granted CWR protection 100% of the time when the requesting customer qualifies for CWR protection based upon MERC's Commission-approved Tariffs and Minn. Stat. § 216B.096; the exception to granting CWR protection is the rare instance where a customer declines the payment arrangement being offered as a condition of CWR protection. MERC reports the % of CWR Granted in Table 3 as a rounded value.

[13] For data reported prior to 2015, MERC reported the % of customers restored within 24 hours based on those restored within 24 hours of entering a payment plan. In accordance with the Commission's March 8, 2021 Order Adopting Reports and Requiring Filings in Docket No. E,G999/CI-20-375, MERC now reports using the approved Residential Customer Status Report as the number of customers whose service was restored within 24 hours of initial disconnection. MERC has restated the % of customers restored within 24 hours from 2015 forward based on the number of customers whose service was restored within 24 hours of initial disconnection. As a result of the modification in reporting, comparisons cannot be made between current reporting and data reported prior to 2015.

[14] Data from 2015 is incomplete as MERC was transitioning to its new customer information system.

7826.1600 REPORTING SERVICE EXTENSION REQUEST RESPONSE TIMES.

The annual service quality report must include a report on service extension request response times, including, for each customer class and each calendar month:

A. the number of customers requesting service to a location not previously served by the utility and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service; and

B. the number of customers requesting service to a location previously served by the utility, but not served at the time of the request, and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service.

MERC Response: The required information is provided in Attachment 5. "New installs" represent new service requests at locations where no gas service exists, either because the location is new construction or because an alternate fuel source has been used there previously. For locations not previously served, new service requests are either related to customers with new construction or customer requesting service to convert to natural gas. "Existing" installs represent any building that has previously had natural gas service, but the service has been disconnected. For locations previously served, service requests consist of requests to turn on service after the service was disconnected at the previous customer's request. Reconnections occurring after disconnections for non-payment are not included in MERC's response.

F. Customer Deposits

The Commission's December 22, 2023 Order in Docket No. G002, G022, G004, G011, G008/CI-22-548, required that in place of prior Customer Deposit reporting requirements, all gas utilities 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 requirement to make a deposit as a condition of receiving service including the total number of deposits held at the end of each year.

MERC Response: The Commission approved modifications to MERC's deposit requirements in Docket No. G011/GR-22-504, effective March 1, 2024, to increase the

maximum deposit that can be charged to residential customers from one month's average usage to two month's average usage. As reflected in MERC's Commission-approved Tariff Sheet No. 8.15 at Section 7.C, effective March 1, 2024, the maximum deposit that can be charged to residential customers was increased from one month's average usage to two month's average usage.

As detailed in the Direct Testimony of Joylyn C. Hoffman Malueg in Docket No. G011/GR-22-504 at pages 51 through 53, the reason for this change is that historically, MERC has been severely under-secured with the maximum deposit calculation for residential customers being one month's usage. The Commission approved tariff change to allow for residential deposits in the amount of two month's usage allows the Company to secure 60%–100% of average residential customer arrears, which now provides adequate security collection.

The Company did not make any changes to customer deposit policies for non-residential customers.

Data for the previous three years is as follows:

Table 4: Customer Deposits (2022-2024)

Year	Number of Customers Required to make a Deposit as a Condition of Receiving Service	Total Number of Deposits Held
2022	0	12
2023	0	11
2024	0	8

G. Customer Complaints

Each utility shall report the customer complaint data by customer class and calendar month, as required under Minn. R. 7826.2000, including:

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:

(1) taking the action the customer requested;

(2) taking an action the customer and the utility agree is an acceptable compromise;

(3) providing the customer with information that demonstrates that the situation complained of is not reasonably within the control of the utility; or

(4) 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.

All gas utilities shall include customer complaint data from Minn. R. 7820.0500 in their annual Service Quality reports.[15] In accordance with the Commission's December 22, 2023 Order in Docket No. G011/M-23-80, MERC worked with the Commission's Consumer Affairs Office ("CAO") to ensure its reporting of complaints forwarded by CAO matches CAO's records.

MERC Response: The required information is provided in Attachment 6 to this filing. In compliance with the Commission's January 18, 2023 Order in Docket No. G011/M-22-219, Attachment 6 also includes customer complaint data required under Minn. R. 7820.0500.

In 2017, as part of ICE, MERC changed the Company's methodology used to track complaints, and continued implementation of and training on the updated methodology in 2018. Specifically, MERC provided significant training to call center representatives to help identify when customers are not satisfied and to recognize when customers call multiple times. In these instances, a call center supervisor performs a call back and all call backs are tracked as a complaint. In 2024, MERC had more complaints than 2023 and recent years. This increase is due to continued training and call center agent adherence towards customer satisfaction through the capturing of customer complaints, regardless of the issue or resolution. Additionally, higher overall consumer costs have driven customers to seek deeper understanding about their household bills.

[15] First Ordered on January 18, 2023, in Docket Nos. E,G-999/PR-22-13, E-111/M-22-168, E-015/M-22-163, E-017/M-22-159, E-002/M-22-162, G-004/M-22-211, G-022/M-22-193, G-011/M-22-219, and G-002/M-22-210. Each utility shall file an annual report on or before May 1 with the Public Utilities Commission containing the following information:
A. The total numbers of resolved and unresolved complaints by class of service and type of complaint.
B. The total number of customers in each class of service and the total number of customers who initiated service during the past year.
C. The names, addresses, and telephone numbers of personnel designated and authorized to receive and respond to the requests and directives of the Public Utilities Commission regarding customer inquiries, service requests, and complaints. The utility shall keep this information current and if changes occur, the utility must inform the commission immediately of these changes.

Table 5: Customer Complaints (2015-2024)

Year	# of Complaints
2015	454
2016	577
2017	1,547
2018	1,883
2019	1,199
2020	1,337
2021	322
2022	197
2023	298
2024	831

H. Gas Emergency Telephone Answer Times

The Commission's August 26, 2010 Order Setting Reporting Requirements in Docket No. G999/CI-09-409 required that each utility shall report data on telephone answer times to its gas emergency phone line.

MERC Response: Information regarding the total number of calls, average telephone answer times, and the percentage of calls answered within 15 seconds is provided in Attachment 7.

I. Gas Emergency Response Times

MERC is required to report data on gas emergency response times and include the percentage of emergencies responded to: (1) within one hour, and (2) within more than one hour, and the average number of minutes it takes to respond to an emergency.

MERC Response: The required information is provided in Attachment 7. The gas emergency call response times include all calls reporting a suspected gas leak, as well as all line hits. MERC also reports the average number of minutes it takes to respond to an emergency. The information provided in Attachment 7 includes response times for all calls reporting a suspected gas leak and line hits. The information in Attachment 7 is the same information provided to MNOPS.

As required by the Commission in its February 9, 2018 Order Accepting MERC's 2015 and 2016 Gas Service Quality Reports, issued in Docket Nos. G011/M-16-371 and G011/M-17-343, MERC provides the emergency response times in total and without farm tap customers. Attachment 7 provides emergency response times for all customers; Attachment 7A provides emergency response times for all non-farm tap customers; and Attachment 7B provides emergency response times only for farm tap customers.

J. Excavation Damages

The Commission's December 22, 2023 Order in Docket No. G002, G022, G004, G011, G008/CI-22-548 required that in place of the mislocate and system damage reporting requirements set by the Commission's August 26, 2010 Order in Docket No. G999/CI-09-409, each gas utility report data on excavation damages using the following metrics:

- The number of excavation tickets received;
- The number of excavation damages;
- The number of excavation damages per 1,000 excavation tickets; and
- The number of at fault damages.

An "at fault damage" shall be defined as a damage where 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.

MERC Response: The required information is provided in Attachment 8.[16]

K. Service Interruptions

The Commission's August 26, 2010 Order Setting Reporting Requirements in Docket No. G999/CI-09-409 required that each utility report data on service interruptions. Each interruption shall be categorized according to whether it was caused by the utility's employees or contractors, or whether it was due to any other unplanned cause. Utilities must provide the number of customers affected by the service interruption and the average duration of the interruptions.[17]

MERC Response: The required information is provided in Attachments 9 and 9A. MERC calculates total outage time beginning when the outage is reported and ending when gas is available to relight appliances. The number of service interruptions in 2024 (206 interruptions) was higher than in 2023 (183 interruptions). MERC also experienced a higher number of service interruptions caused by MERC employees and contractors in 2024 as compared to 2023 due in part to mislocates by MERC's locating contractor. Anytime there is a service interruption caused by MERC's employees or contractors, MERC takes corrective action including training to prevent future occurrences. MERC also has monthly meetings with its locate contractor to review performance and address any issues.

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[16] MERC notes that Gopher State One Call ("GSOC") also has non-excavation ticket request types, which are not included in MERC's reporting of the "number of excavation tickets received," because those request are not excavation tickets.

[17] *See In the Matter of the Annual Serv. Quality Report for Minn. Energy Res. Corp. for 2010*, Docket No. G007, 011/M-10-374, Order Accepting Reports and Setting Further Requirements at 3 (Mar. 6, 2012); *see also In the Matter of the Annual Serv. Quality Report for Minn. Energy Res. Corp. for 2023*, Docket No. G011/M-24-34, Order (Dec. 26, 2024) (requiring all gas utilities except Greater Minnesota Gas, to report the number of customers whose service was interrupted and the average duration of interruptions as part of their service interruption reporting requirements).

The nonpublic version of Attachment 9A contains customer addresses. This information is maintained by MERC as private customer data and has been excised from the public version of the filing in accordance with Minn. Stat. § 13.679.

As shown in Attachments 9 and 9A and summarized in Attachment 10, April had an outage that impacted a large number of customers and December had an outage with a long duration. The outage in April 2024 affected 240 customers and involved MERC's contractor stopping gas flow on a portion of MERC's system where the contractor had incorrectly assumed the system would be feed by another line that had previously been retired. In December 2024, the outage that lasted 3,681 minutes (approximately two and a half days) involved a vacant house where immediate restoration of gas service was not required.

L. Major Incident Reporting on MNOPS Reportable Events

The Commission's August 26, 2010 Order Setting Reporting Requirements in Docket No. G999/CI-09-409 required that each utility report summaries of major events that are immediately reportable to the MNOPS according to the criteria used by MNOPS to identify reportable events. Each utility shall also provide summaries of all service interruptions caused by system integrity pressure issues. 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; and
- the longest any customer was without gas service during the incident.

MERC Response: The required information regarding MNOPS reportable events is provided in Attachment 10. The nonpublic version of Attachment 10 includes "private data on individuals," such as customer addresses. This information is maintained by MERC as private customer data, and has been excised from the public version of this filing pursuant to Minn. Stat. § 13.679.

M. Integrity Management Plan Reporting

The Commission's December 22, 2023 Order in Docket No. G002, G022, G004, G011, G008/CI-22-548 required that going forward, MERC shall report the following metrics from its Annual PHMSA Report in its service quality report in place of any previously ordered Integrity Management Plan, Distribution Integrity Management Plan, and Transmission Integrity Management Plan reporting requirements:

a. Miles of Distribution Main
b. Number of Main Leaks
c. Number of Main Leaks by Cause
d. Number of Hazardous Main Leaks by Cause
e. Main Leaks per 1,000 Miles of Main
f. Number of Services
g. Number of Service Leaks
h. Number of Service Leaks by Cause
i. Service Leaks per 1,000 Services

MERC Response: MERC's 2024 PHMSA Annual Report for Calendar Year 2024 is included as Attachment 1. The metrics pertaining to data points e) Main Leaks per 1,000 Miles of Main, and i) Service Leaks per 1,000 Services, as derived from data provided in MERC's Annual PHMSA Report, are summarized in the table below.

Table 6: Parts e) and i): Main Leaks per 1,000 Miles of Main and Service Leaks per 1,000 Services

Metric	2024
Miles of Distribution Main	5,434.5 miles
Number of Main Leaks[18]	67
Main Leaks per 1,000 Miles of Main[19]	12.33
Number of Services	242,240 services
Number of Service Leaks[20]	1,095
Service Leaks per 1,000 Services[21]	4.52

[18] As reported in MERC's PHMSA Annual Gas Distribution Report, leaks eliminated/repaired during the year.
[19] MERC notes that in its 2023 Gas Service Quality Report, the Company incorrectly provided total main leaks divided by the miles of distribution main rather than leaks per 1,000 miles. The correct 2023 number of main leaks per 1,000 miles of main is 15.97.
[20] As reported in MERC's PHMSA Annual Gas Distribution Report, leaks eliminated/repaired during the year.
[21] MERC notes that in its 2023 Gas Service Quality Report, the Company incorrectly provided total service line leaks divided by the number of service lines rather than leaks per 1,000 service lines. The correct 2023 number of service leaks per 1,000 services is 5.28.

N. Excess Flow Valve and Manual Shutoff Valve Installation and Customer Outreach

In Docket No. G999/CI-18-41, the gas utilities were required to report the status of EFV and manual shutoff valve installations by customer class throughout the utilities' service territories; report a plan and timeline for completing the installation of EFVs and manual shut-off valves for the remainder of the utilities' service territories; and hold face-to-face meetings with the decision-makers of K-12 public school districts and non-public schools with buildings in the utilities' service territory, public and private universities and colleges, hospitals, and multi-unit residential and nursing facilities.

The Commission's December 22, 2023 Order in Docket No. G002, G022, G004, G011, G008/CI-22-548 allowed utilities that have completed the EFV outreach required by the Commission's July 13, 2019 Order in Docket No. G999/CI-18-41 to cease reporting on EFVs, manual shut-off valves, and related outreach in their annual service quality reports.[22]

MERC reports on EFV and manual shut-off valve installations through 2024 in the tables below.

Table 7: EFV Installation (through 2024)

Number of Customers Suitable for EFV Installation[23] (a)	Total Number of Installed EFVs (b)	Number of Customers Who Requested Installation[24] (c)	Percentage of Suitable Customers with EFVs (d)	Number of Customers Unsuitable for EFVs[25] (e)
		(subset of (b))	(b)/(a)	
237,220	79,562	0	33.5%	5,020

[22] Upon receiving confirmation from the Commission, utilities that have competed 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

[23] A customer is suitable for an EFV if they fall under the installation requirements of 49 CFR § 192.383, which is having a service operated at least 10 pounds per square inch gauge and serve a customer load not greater than 1,000 SCFH. However, the actual number of services with technical feasibility for an EFV installation may vary since an engineering analysis is required, on a case-by-case basis, to determine technical feasibility.

[24] Since August 20, 2018, which is the date of the Commission's Order Finding that Excess Flow Valves Comply with Federal Regulations and Taking Other Actions in Docket No. G999/CI-18-41.

[25] A customer unsuitable for an EFV may be suitable for a manual shut-off valve. A customer is suitable for a manual shut-off valve if they do not meet the requirements of 49 C.F.R. § 192.383.

Table 8: Manual Shut-Off Valve Installation (through 2024)

Number of Customers Suitable for Manual Shut-Off Valves[26] (a)	Total Number of Installed Manual Shut-Off Valves (b)	Number of Customers Who Requested Installation[27] (c)	Percentage of Suitable Customers with Manual Shut-Off Valves (d)
		(subset of (b))	(b)/(a)
5,020	521	0	10.4%

With respect to the number of customers without EFVs or manual shut-off valves, Ordering Paragraph 7.a. of the Commission's August 20, 2018 Order[28] required that MERC identify customers within the following categories who do not already have EFVs (and are eligible under the federal standards) or manual shutoff valves and are not within an area that the utility plans to upgrade by 2025:

- K-12 public districts with school buildings in the utility's service territory;
- K-12 non-public schools with school buildings in the utility's service territory;
- Public and private universities and colleges;
- Hospitals; and
- Multi-unit residential and nursing facilities.

MERC identified the number of customers within the specified categories that did not already have either an EFV or emergency service line shutoff valve installed, as well as which customers may meet the criteria to qualify for an EFV based on installed meter capacity, noting that further analysis is also required on a customer-by-customer basis to verify the total installed meter capacity of each service line and to evaluate whether any such installation would otherwise be technically feasible. On MERC's system, a single service line often will serve multiple meters in commercial and multifamily applications and in such cases, the total installed meter capacity served by the service line must be evaluated (i.e., whether the total installed meter capacity of all meters falls below the EFV threshold specified within the federal regulations). Other engineering considerations also need to be evaluated to determine technical feasibility including system pressure, load diversity, service line pressure, and other operational considerations. MERC reported the number of customers who may qualify for an EFV

[26] A customer is suitable for a manual shut-off valve if the customer does not meet the requirements of 49 CFR § 192.383.

[27] Since August 20, 2018, which is the date of the Commission's Order Finding that Excess Flow Valves Comply with Federal Regulations and Taking Other Actions in Docket No. G-999/CI-18-41.

[28] *In the Matter of Comm'n Investigation into Natural Gas Utils' Practices, Tariffs, and Assignment of Cost Responsibility for Installation of Excess Flow Valves and Other Similar Gas Safety Equip.*, Docket No. G999/CI-18-41, Order Accepting Compliance Filings, Requiring MERC to Submit Additional Information, Requiring Annual Compliance Reporting, and Taking Other Action at 7 (July 31, 2019).

under the federal standards based on installed meter capacity in its March 31, 2020, compliance filing.[29]

Ordering Paragraph 7.b. required each gas utility to establish and file a plan to have meetings with the decision-maker of the customers identified above, eligible under the federal standards for EFVs, regarding the purpose of EFVs and manual service line shutoff valves, along with the utility's installation policy, and estimated costs. As previously reported in Docket G999/CI-18-41 and MERC's annual Gas Service Quality reports, MERC completed outreach to public and non-public schools and hospitals. Based on MERC's outreach, 26 customers in those categories indicated an interest in possibly having an EFV installed on their natural gas service line. Of those, 20 indicated an interest in obtaining additional information, which MERC provided as a follow up with the customer. Five customers who expressed interest in possibly having an EFV installed were determined not to be eligible based on detailed review of the service line installed meter capacity. Finally, one customer who expressed interest is in an area of planned Aldyl-A replacements and will therefore have an EFV installed when MERC completes that obsolete materials replacement project.

The remaining categories of multi-family residential and nursing facilities represent the most difficult categories to verify installed meter capacity for each service line and to identify a point of contact for outreach because often, each customer is listed individually by meter and the building is not classified as a multiunit residential or nursing facility within MERC's customer information system. As of the end of 2024, the service line mapping project was largely complete. While some verification work remains to be completed, MERC now has the information needed to begin confirmation of EFV eligibility based on installed meter capacity and completing customer outreach for the remaining categories of customers. MERC plans to resume outreach to the remaining categories of multi-family residential and nursing facilities in 2025.

O. MNOPS Emergency Response Violations and Violation Letters

The Commission's December 22, 2023 Order in Docket No. G002, G022, G004, G011, G008/CI-22-548 required that in place of prior reporting requirements on MNOPS violations and violation letters, the gas utilities shall 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 within their Annual Service Quality Reports.

MERC Response: The required summary of violations cited by MNOPS that were received during calendar year 2024,[30] along with a description of each cited violation, the relevant citation code, and remediation is included in Attachment 11.

[29] This information reflects the number of service lines rather than the number of premises. MERC notes that many of the identified customer addresses have multiple meters and/or multiple service lines where an EFV or emergency service line shut-off valve would need to be installed on each service line and eligibility would need to be evaluated based on each service line's installed meter capacity.

[30] Attachment 11 includes all violation letters (Notice of Probable Violation and Warning Letters) received during calendar year 2024. During 2023 and 2024, MNOPS has been delayed in issuing Notice of

P. Web-Based Metrics

The Commission's December 22, 2023 Order in Docket No. G002, G022, G004, G011, G008/CI-22-548 required that 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)
- 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)
- 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)

MERC Response: The requested information on web metrics for 2024 are summarized in the table below.

Table 9: Web Metrics (2024)

Year	Percentage of uptime of the utility's enterprise-wide website	Percentage of uptime for web payment services ability[31]	Error rate percentage for the utility-based payment services[32]	Annual number of website visits[33]	Annual number of logins via electronic customer communication platforms[34]
2024	99.99%	99.63%	0.0089%	567,509	1,630,165

Probable Violation and Warning Letters in follow up to routine annual and periodic audits. Notice of Probable Violation and Warning Letters received in calendar year 2024 but stemming from audits conducted in 2023 are included in Attachment 11.

[31] Defined as the percentage of time that web payment services are available to some customers on utility-based platforms. For MERC, this includes mobile app payment services and website payment services.

[32] 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.

[33] Annual number of visits to MERC's initial facing enterprise-wide website, www.minnesotaenergyresources.com.

[34] Includes MERC website and mobile app.

CONCLUSION

MERC respectfully requests that the Commission accept the Company's 2024 Gas Service Quality Report as in compliance with all applicable reporting requirements.

Dated: May 1, 2025

Respectfully submitted,

TAFT STETTINIUS & HOLLISTER LLP

By: *<u>/s/ Kristin M. Stastny</u>*

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80 South Eighth Street
Minneapolis, MN 55402
(612) 977-8656
KStastny@taftlaw.com

Attorney for Minnesota Energy Resources Corporation

Attachment 1
PHMSA Annual Report for Calendar Year 2024 – Gas Distribution System

NOTICE: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty OMB No. 2137-0629 as provided in 49 USC 60122.

OMB NO: 2137-0629
EXPIRATION DATE: 6/30/2026

		Initial Date Submitted:	03/14/2025
U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration	**ANNUAL REPORT FOR CALENDAR YEAR 2024 GAS DISTRIBUTION SYSTEM**	**Report Submission Type**	SUPPLEMENTAL
		Date Submitted:	04/24/2025

A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2137-0629. Public reporting for this collection of information is estimated to be approximately 20 hours per response, including the time for reviewing instructions, gathering the data needed, and completing and reviewing the collection of information. All responses to this collection of information are mandatory. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, PHMSA, Office of Pipeline Safety (PHP-30) 1200 New Jersey Avenue, SE, Washington, D.C. 20590.

Important: *Please read the separate instructions for completing this form before you begin. They clarify the information requested and provide specific examples. If you do not have a copy of the instructions, you can obtain one from the PHMSA Pipeline Safety Community Web Page at http://www.phmsa.dot.gov/pipeline/library/forms.*

PART A - OPERATOR INFORMATION	**(DOT use only)**		20251163-74720

1. Name of Operator	MINNESOTA ENERGY RESOURCES CORPORATION
2. LOCATION OF OFFICE (WHERE ADDITIONAL INFORMATION MAY BE OBTAINED)	
2a. Street Address	2685 145th St W
2b. City and County	Rosemount Dakota
2c. State	MN
2d. Zip Code	55068
3. OPERATOR'S 5 DIGIT IDENTIFICATION NUMBER	32198
4. HEADQUARTERS NAME & ADDRESS	
4a. Street Address	2685 145TH STREET WEST
4b. City and County	ROSEMOUNT
4c. State	MN
4d. Zip Code	55068
5. STATE IN WHICH SYSTEM OPERATES	MN
6. **THIS REPORT PERTAINS TO THE FOLLOWING COMMODITY GROUP** *(Select Commodity Group based on the predominant gas carried and complete the report for that Commodity Group. File a separate report for each Commodity Group included in this OPID.)*	
Natural Gas	
7. **THIS REPORT PERTAINS TO THE FOLLOWING TYPE OF OPERATOR** *(Select Type of Operator based on the structure of the company included in this OPID for which this report is being submitted.)***:**	
Investor Owned	

PART B - SYSTEM DESCRIPTION

1.GENERAL

	STEEL				PLASTIC	CAST/ WROUGHT IRON	DUCTILE IRON	COPPER	OTHER	RECONDITIONED CAST IRON	SYSTEM TOTAL
	UNPROTECTED		CATHODICALLY PROTECTED								
	BARE	COATED	BARE	COATED							
MILES OF MAIN				1380.92	4053.58	0	0	0	0	0	5434.5
NO. OF SERVICES				36244	205790	0	0	206	0	0	242240

NOTICE: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty OMB No. 2137-0629 as provided in 49 USC 60122.

OMB NO: 2137-0629
EXPIRATION DATE: 6/30/2026

2. MILES OF MAINS IN SYSTEM AT END OF YEAR

MATERIAL	UNKNOWN	2" OR LESS	OVER 2" THRU 4"	OVER 4" THRU 8"	OVER 8" THRU 12"	OVER 12"	SYSTEM TOTALS
STEEL	0	666.87	456.69	200.46	50.76	6.14	1380.92
DUCTILE IRON	0	0	0	0	0	0	0
COPPER	0	0	0	0	0	0	0
CAST/WROUGHT IRON	0	0	0	0	0	0	0
PLASTIC PVC	0	0	0	0	0	0	0
PLASTIC PE	0	2883.96	936.38	233.24	0	0	4053.58
PLASTIC ABS	0	0	0	0	0	0	0
PLASTIC OTHER	0	0	0	0	0	0	0
OTHER	0	0	0	0	0	0	0
RECONDITIONED CAST IRON	0	0	0	0	0	0	0
TOTAL	0	3550.83	1393.07	433.7	50.76	6.14	5434.5
Describe Other Material:							

3.NUMBER OF SERVICES IN SYSTEM AT END OF YEAR — **AVERAGE SERVICE LENGTH: 82.22**

MATERIAL	UNKNOWN	1'' OR LESS	OVER 1'' THRU 2''	OVER 2'' THRU 4''	OVER 4'' THRU 8''	OVER 8''	SYSTEM TOTALS
STEEL	0	33939	2224	76	5	0	36244
DUCTILE IRON	0	0	0	0	0	0	0
COPPER	0	206	0	0	0	0	206
CAST/WROUGHT IRON	0	0	0	0	0	0	0
PLASTIC PVC	0	0	0	0	0	0	0
PLASTIC PE	0	203075	2440	265	10	0	205790
PLASTIC ABS	0	0	0	0	0	0	0
PLASTIC OTHER	0	0	0	0	0	0	0
OTHER	0	0	0	0	0	0	0
RECONDITIONED CAST IRON	0	0	0	0	0	0	0
TOTAL	0	237220	4664	341	15	0	242240
Describe Other Material:							

4.MILES OF MAIN AND NUMBER OF SERVICES BY DECADE OF INSTALLATION

	UNKNOWN	PRE-1940	1940-1949	1950-1959	1960-1969	1970-1979	1980-1989	1990-1999	2000-2009	2010-2019	2020-2029	TOTAL
MILES OF MAIN	0.2	0	3.3	83.6	478.5	633.6	583.3	1287.6	991.5	864.5	508.4	5434.5
NUMBER OF SERVICES	128817	0	0	275	417	1653	1851	4194	44240	37316	23477	242240

PART C - TOTAL LEAKS AND HAZARDOUS LEAKS ELIMINATED/REPAIRED DURING THE YEAR

CAUSE OF LEAK	MAINS		SERVICES	
	TOTAL	HAZARDOUS	TOTAL	HAZARDOUS
CORROSION FAILURE	0	0	6	1
NATURAL FORCE DAMAGE	3	0	24	0
EXCAVATION DAMAGE	37	9	134	7
OTHER OUTSIDE FORCE DAMAGE	2	0	20	0
PIPE, WELD OR JOINT FAILURE	7	0	218	0

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EXPIRATION DATE: 6/30/2026

EQUIPMENT FAILURE	9	0	638	4
INCORRECT OPERATIONS	3	0	35	1
OTHER CAUSE	6	0	20	1

NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR : **103**
NUMBER OF HAZARDOUS LEAKS INVOLVING A MECHANICAL JOINT FAILURE : 1

PART D – EXCAVATION DAMAGE

Notification Issue Sub-Total	52	**Location Issue Sub-Total**	57
No notification made to the One-Call Center/811	42	Facility not marked due to Abandoned facility	0
Excavator dug outside area described on ticket	1	Facility not marked due to Incorrect facility records/maps	3
Excavator dug prior to valid start date/time	4	Facility not marked due to Locator error	18
Excavator dug after valid ticket expired	5	Facility not marked due to No response from operator/contract locator	5
Excavator provided incorrect notification information	0	Facility not marked due to Incomplete marks at damage location	13
		Facility not marked due to Tracer wire issue	0
Excavation Issue Sub-Total	*105*	Facility not marked due to Unlocatable Facility	2
Excavator dug prior to verifying marks by test-hole (pothole)	47	Facility marked inaccurately due to Abandoned facility	0
Excavator failed to maintain clearance after verifying marks	16	Facility marked inaccurately due to Incorrect facility records/maps	2
Excavator failed to protect/shore/support facilities	15	Facility marked inaccurately due to Locator error	10
Improper backfilling practices	0	Facility marked inaccurately due to Tracer wire issue	4
Marks faded or not maintained	16		
Improper excavation practice not listed above	11		
Miscellaneous Root Causes Sub-Total	*0*		
Deteriorated facility	0		
One Call Center Error	0		
Previous damage	0	1. Total Excavation Damages	214
Root Cause not listed	0	2. Number of Excavation Tickets	106535

NOTICE: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty OMB No. 2137-0629 as provided in 49 USC 60122.

OMB NO: 2137-0629
EXPIRATION DATE: 6/30/2026

PART E – RESERVED

PART F - LEAKS ON FEDERAL LAND	**PART G – PERCENT OF UNACCOUNTED FOR GAS**
TOTAL NUMBER OF LEAKS ON FEDERAL LAND REPAIRED OR SCHEDULED TO REPAIR: 0	UNACCOUNTED FOR GAS AS A PERCENT OF TOTAL CONSUMPTION FOR THE 12 MONTHS ENDING JUNE 30 OF THE REPORTING YEAR. [(PURCHASED GAS + PRODUCED GAS) MINUS (CUSTOMER USE + COMPANY USE + APPROPRIATE ADJUSTMENTS)] DIVIDED BY (CUSTOMER USE + COMPANY USE + APPROPRIATE ADJUSTMENTS) TIMES 100 EQUALS PERCENT UNACCOUNTED FOR. FOR YEAR ENDING 6/30: 1.144%

PART H - ADDITIONAL INFORMATION

PART I - PREPARER	
Lindsay Lyle Engineering Manager (Preparer's Name and Title)	(651) 322-8909 (Area Code and Telephone Number)
Lindsay.Lyle@minnesotaenergyresources.com (Preparer's email address)	(000) 000-0000 (Area Code and Facsimile Number)

Attachment 2
Call Center Response Time

Call Center Response Time

Calls answered within 20 seconds

	January	February	March	April	May	June	July	August	September	October	November	December	YTD Average	Total
Total calls	18,707	14,969	15,375	14,786	16,790	16,987	13,172	12,891	13,228	16,254	12,638	13,789	14,966	179,586
Average speed of answer (seconds)	10	10	9	12	12	13	11	10	15	9	15	15	12	
% answered in 20 seconds	92%	93%	95%	92%	91%	90%	91%	93%	89%	95%	90%	88%	92%	

Attachment 3
Meter Reading Performance Data

Meter Reading Performance

	Total meters	# company read	% company read	# self-read	% of self-read	# not read in 6-12 months	% not read in 6-12 months	# not read > 12 months	% not read > 12 months	Comments
without farm taps										
January	254,420	252,616	99.29%	8	0.00%	3	0.0012%	-	0.0000%	Processing Delay
February	254,545	238,818	93.82%	10	0.00%	6	0.0024%	-	0.0000%	Processing Delay, AMI network issue
March	254,639	243,638	95.68%	6	0.00%	4	0.0016%	-	0.0000%	Accessibility, Processing delay, AMI network issue
April	254,820	251,059	98.52%	5	0.00%	2	0.0008%	-	0.0000%	Processing delay, AMI network issue
May	254,930	253,283	99.35%	4	0.00%	2	0.0008%	-	0.0000%	Processing delay, AMI network issue
June	255,027	244,094	95.71%	3	0.00%	3	0.0012%	-	0.0000%	Processing delay, AMI network issue
July	255,335	240,064	94.02%	3	0.00%	2	0.0008%	1	0.0004%	Processing delay, AMI network issue
August	255,440	252,888	99.00%	6	0.00%	1	0.0004%	1	0.0004%	Processing delay, AMI network issue
September	255,650	253,099	99.00%	4	0.00%	1	0.0004%	-	0.0000%	AMI network issue
October	256,117	254,428	99.34%	3	0.00%	-	0.0000%	-	0.0000%	
November	256,418	230,228	89.79%	4	0.00%	1	0.0004%	-	0.0000%	Processing delay
December	256,665	254,492	99.15%	6	0.00%	-	0.0000%	-	0.0000%	
Total	3,064,006	2,968,707	96.9%	62	0.0%	25	0.0%	2	0.0%	
with farm taps										
January	256,120	252,801	98.70%	571	0.22%	286	0.1117%	-	0.0000%	Farm taps, Processing Delay
February	256,236	239,061	93.30%	580	0.23%	284	0.1108%	-	0.0000%	Farm taps, Processing Delay, AMI network issue
March	256,327	243,901	95.15%	517	0.20%	191	0.0745%	-	0.0000%	Farm taps, Accessibility, Processing delay, AMI network issue
April	256,509	251,339	97.98%	533	0.21%	98	0.0382%	16	0.0062%	Farm taps, Processing delay, AMI network issue
May	256,598	253,591	98.83%	469	0.18%	20	0.0078%	10	0.0039%	Farm taps, Processing delay, AMI network issue
June	256,696	244,257	95.15%	451	0.18%	18	0.0070%	1	0.0004%	Farm taps, Processing delay, AMI network issue
July	256,998	240,204	93.47%	417	0.16%	18	0.0070%	3	0.0012%	Farm taps, Processing delay, AMI network issue
August	257,098	253,041	98.42%	429	0.17%	39	0.0152%	2	0.0008%	Farm taps, Processing delay, AMI network issue
September	257,305	253,241	98.42%	493	0.19%	109	0.0424%	2	0.0008%	Farm taps, AMI network issue
October	257,758	254,576	98.77%	618	0.24%	224	0.0869%	6	0.0023%	Farm taps,
November	258,062	230,380	89.27%	474	0.18%	322	0.1248%	2	0.0008%	Farm taps, Processing delay
December	258,302	254,623	98.58%	579	0.22%	338	0.1309%	-	0.0000%	Farm taps,
Total	3,084,009	2,971,015	96.3%	6,131	0.2%	1,947	0.1%	42	0.0%	

Note - as described in Commission Staff Briefing Papers in Docket No. G011/M-23-80, when reporting total meters unread for 6-12 months or 12+ months, meters may be double counted if they remained unread across multiple months.

Attachment 3A
Meter Reading FTE

Meter Reading FTEs

	Hours charged to Meter Reading												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total Yr
2011	5,293	5,432	5,178	6,446	4,185	3,705	3,824	4,042	3,862	5,989	3,800	4,592	56,346
2012	4,139	4,469	4,271	6,122	3,973	3,844	3,834	4,133	3,882	5,744	3,616	4,552	52,579
2013	4,041	4,382	4,271	6,207	3,920	3,684	3,723	3,682	3,849	5,658	3,980	4,083	51,481
2014	5,312	5,173	5,067	4,840	4,123	4,029	4,119	3,811	3,895	4,136	3,784	4,711	52,999
2015	4,552	4,364	4,563	4,362	4,035	4,406	3,876	4,352	4,013	4,338	7,782	4,243	54,887
2016	4,094	5,134	4,869	4,198	4,222	4,291	3,988	4,537	4,086	4,049	4,158	4,672	52,295
2017	4,989	4,454	4,680	3,795	4,168	4,151	3,622	4,170	3,741	3,938	3,945	4,221	49,874
2018	4,802	4,412	4,546	4,259	4,005	4,002	4,030	4,092	3,392	3,807	3,451	3,613	48,411
2019	4,447	4,526	4,388	3,950	3,824	3,308	3,904	3,935	3,575	3,962	3,627	4,090	47,535
2020	4,565	4,306	4,268	3,625	2,954	3,068	2,905	2,526	2,066	1,936	1,429	1,486	35,132
2021	1,152	1,083	1,206	718	558	635	629	709	409	437	381	444	8,359
2022	449	311	350	242	257	298	294	314	261	294	290	325	3,684
2023	302	327	315	321	316	314	312	442	317	372	454	481	4,272
2024	422	357	397	296	313	208	291	238	272	317	282	308	3,698

	FTE Equivalent												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total Yr
2011	30.4	31.2	29.8	37.0	24.1	21.3	22.0	23.2	22.2	34.4	21.8	26.4	27.1
2012	23.8	25.7	24.5	35.2	22.8	22.1	22.0	23.8	22.3	33.0	20.8	26.2	25.3
2013	23.2	25.2	24.5	35.7	22.5	21.2	21.4	21.2	22.1	32.5	22.9	23.5	24.8
2014	30.5	29.7	29.1	27.8	23.7	23.2	23.7	21.9	22.4	23.8	21.7	27.1	25.5
2015	26.2	25.1	26.2	25.1	23.2	25.3	22.3	25.0	23.1	24.9	44.7	24.4	26.4
2016	23.5	29.5	28.0	24.1	24.3	24.7	22.9	26.1	23.5	23.3	23.9	26.8	25.1
2017	28.7	25.6	26.9	21.8	24.0	23.9	20.8	24.0	21.5	22.6	22.7	24.3	24.0
2018	27.6	25.4	26.1	24.5	23.0	23.0	23.2	23.5	19.5	21.9	19.8	20.8	23.3
2019	25.6	26.0	25.2	22.7	22.0	19.0	22.4	22.6	20.5	22.8	20.8	23.5	22.9
2020	26.2	24.7	24.5	20.8	17.0	17.6	16.7	14.5	11.9	11.1	8.2	8.5	16.9
2021	6.6	6.2	6.9	4.1	3.2	3.6	3.6	4.1	2.3	2.5	2.2	2.5	4.0
2022	2.6	1.8	2.0	1.4	1.5	1.7	1.7	1.8	1.5	1.7	1.7	1.9	1.8
2023	1.7	1.9	1.8	1.8	1.8	1.8	1.8	2.5	1.8	2.1	2.6	2.8	2.1
2024	2.4	2.0	2.3	1.7	1.8	1.2	1.7	1.4	1.6	1.8	1.6	1.8	1.8

	External Meter Readers - FTE
2011	4.65
2012	4.25
2013	4.75
2014	4.80
2015	6.10
2016	6.37
2017	6.72
2018	9.62
2019	12.99
2020	5.85
2021	-
2022	-
2023	-
2024	-

Attachment 4
Involuntary Service Disconnections

Utility Monthly Report											
Name of Utility	Minnesota Energy Resources				Highlight Indicates Data Required per Statutes 216B.091 and 216B.096						
Reporting Month/Year	Dec-24										
All Utilities											
	A	**B**	**C**	**D**	**E**	**F**	**G**	**H**	**I**	**J**	**K**
	# Residential Customers	Total Revenue from Sales to Residential Customers	# Past Due Residential Customers	Total Dollars Past Due Residential Customers	Average Past Due Dollar Amount Per Past Due Customers	Average Monthly Residential Bill	New LIHEAP Customers	Cumulative LIHEAP Customers (year to date)	Total Dollars Received From LIHEAP	Total Dollars Received from other sources	Total Residential Write-Offs due to uncollectible
Jan-24	219,021	32,662,010	28,617	4,663,984	163	149	1,402	8,154	$ 454,717	360	307,400
Feb-24	219,361	20,622,693	31,074	5,867,193	189	94	1,582	9,736	$ 478,604	2,077	133,217
Mar-24	219,509	17,177,007	30,635	5,823,766	190	78	1,237	10,973	$ 375,356	2,937	154,867
Apr-24	219,811	11,092,916	30,856	5,723,484	185	50	764	11,737	$ 248,108	2,724	98,897
May-24	219,225	4,948,503	32,026	5,006,127	156	23	661	12,398	$ 215,445	2,830	87,269
Jun-24	218,436	(1,010,527)	33,375	4,157,058	125	(5)	344	12,742	$ 104,845	3,498	205,965
Jul-24	218,392	4,125,686	35,649	3,825,819	107	19	44	12,786	$ 13,446	796	1,524,676
Aug-24	218,359	4,569,906	34,593	3,817,422	110	21	1	12,787	$ 532	597	84,957
Sep-24	218,584	3,893,994	31,549	3,556,278	113	18	-	12,787	$ -	85	87,895
Oct-24	219,448	7,043,934	32,121	3,417,569	106	32	-	12,787	$ -	1,215	99,483
Nov-24	220,674	16,154,525	33,632	3,410,583	101	73	4,361	4,361	$ 1,508,920	295	231,045
Dec-24	221,372	30,703,966	33,968	4,086,567	120	139	1,622	5,983	$ 563,429	668	365,103

All Utilities											
	L	**M**	**N**	**O**	**P**	**Q**	**R**	**S**	**T**	**U**	**V**
	# Residential Customers Receiving Disconnect Notices	# Residential Customers Involuntarily Disconnected	Remote Disconnections	Remote Reconnections	# Residential Customers restored to service w/in 24 hours (SRSQ)	# Residential Customers restored to service by entering a payment plan (SRSQ)	# Residential Customers restored at same address	Total # Residential Customers Reconnected	# Residential Customers Remaining Disconnected, 1-30 days	# Residential Customers Remaining Disconnected, 31-60 days	# Residential Customers Remaining Disconnected, 60+ days
Jan-24	5,977	45	-	-	6	1	7	7	22	1	16
Feb-24	7,716	37	-	-	10	17	56	56	19	1	17
Mar-24	7,236	26	-	-	8	2	15	15	12	18	18
Apr-24	8,125	56	-	-	4	3	17	17	40	9	37
May-24	6,314	1,840	-	-	130	21	569	569	1,259	9	-
Jun-24	2,737	933	-	-	71	23	439	439	610	1,153	3
Jul-24	1,709	544	-	-	57	20	288	288	348	541	1,121
Aug-24	1,214	225	-	-	24	10	205	205	120	280	1,644
Sep-24	1,132	168	-	-	19	7	205	205	81	102	1,821
Oct-24	1,213	1	-	-	1	149	567	567	-	50	1,400
Nov-24	1,260	2	-	-	1	68	326	326	1	-	1,127
Dec-24	1,939	5	-	-	4	19	103	103	-	1	1,029

All Utilities, October - April

	# Customers Seeking Cold Weather Rule Protections	# Customers Granted Cold Weather Rule Protections	# Customers Involuntarily Disconnected, **who sought protection** heat affected (gas)	# Customers Involuntarily Disconnected, **who sought protection** non-heat affected (gas)	# Customers Involuntarily Disconnected, who sought protection heat affected (electric)	# Customers Involuntarily Disconnected, who sought protection non-heat affected (electric)	# Customers Involuntarily Disconnected, **who did not seek protection** heat affected (gas)	# Customers Involuntarily Disconnected, **who did not seek protection** non-heat affected (gas)	# Customers Involuntarily Disconnected, who did not seek protection heat affected (electric)	# Customers Involuntarily Disconnected, who did not seek protection non-heat affected (electric)	Total Customers Disconnected
Jan-24	440	432	3	-			42	-			45
Feb-24	332	332	10	-			27	-			37
Mar-24	230	229	-	-			26	-			26
Apr-24	96	96	-	-			56	-			56
May-24											
Jun-24											
Jul-24											
Aug-24											
Sep-24											
Oct-24	341	340	-	-			1	-			1
Nov-24	236	233	-	-			2	-			2
Dec-24	232	228	-	-			5	-			5

	# of Appeal Notices sent to customers	**# of Payment Plan (PP) requests received**	**# of mutally agreed PP**	**# reconnect request appeals withdrawn**	**# of customers with current payment plans**	**# customers disconnected 24 hours or more heat affected (gas)**	**# customers disconnected 24 hours or more non-heat affected (gas)**	# customers disconnected 24 hours or more heat affected (electric)	# customers disconnected 24 hours or more non-heat affected (electric)	**# accounts reconnected within 24 hrs**	**Total # Customers Reconnected**
Jan-24	-	1,418	1,129	-	2,497	39	-			6	7
Feb-24	1	1,327	1,046	1	2,702	27	-			10	56
Mar-24	-	1,283	1,001	-	2,842	18	-			8	15
Apr-24	-	1,156	857	-	2,494	52	-			4	17
May-24											
Jun-24											
Jul-24											
Aug-24											
Sep-24											
Oct-24	-	660	527	-	1,425	-	-			1	567
Nov-24	-	528	427	-	1,421	1	-			1	326
Dec-24	-	571	440		1,435	1	-			4	103

File this form separately each week as required. Then, provide all weeks for a given month when making monthly filing.

Utility Heating Service Customers*

*whose service is disconnected or remains disconnected for nonpayment as of October 1 and October 15. If customers remain disconnected on October 15, a utility must file a report each week between November 1 and the end of the cold weather period

**The utility may discontinue weekly reporting if the number of utility heating service customers that are or remain disconnected reaches zero before the end of the cold weather period.

	All Utilities (starting October 1)			
Week ending date	Total # Customers Currently Disconnected for non-payment	# Customers Involuntarily Disconnected for non-payment This Week, Natural Gas	# Customers Involuntarily Disconnected for non-payment This Week, Electric	# Customers Reconnected This Week**
9/30/2024	-	-		-
10/5/2024	1,913	-		95
10/12/2024	1,766	1		151
10/19/2024	1,576	-		193
10/26/2024	1,501	-		75
11/2/2024	1,421	-		80
11/9/2024	1,328	-		93
11/16/2024	1,259	1		70
11/23/2024	1,179	1		83
11/30/2024	1,128	-		51
12/7/2024	1,074	2		56
12/14/2024	1,048	3		29
12/21/2024	1,037	-		11
12/28/2024	1,034	-		3
1/4/2025	1,019	-		15
1/11/2025	1,012	-		7
1/18/2025				
1/25/2025				
2/1/2025				
2/8/2025				
2/15/2025				
2/22/2025				
3/1/2025				
3/8/2025				
3/15/2025				
3/22/2025				
3/29/2025				
4/5/2025				
4/12/2025				
4/19/2025				
4/26/2025				
4/30/2025				

All Utilities

	Total Res. Customers**	Total Residential Customer Disconnects	# LIHEAP Customers	# LIHEAP Disconnects ***	Disconnect Rate (%), Total Residential	Disconnect Rate (%), LIHEAP	# Customers Restored within 24 hours	# Customers Restored with Payment Plan	# Customers Disconnected 30+ days	# Customers Seeking CWR Protection	# Customers Granted CWR Protection	# Customers Requesting Medical Acct Status	# Customers Granted Medical Acct Status
2015	207,350	5,393	12,049	1,176	2.6%	9.8%	n/a *	8,748	3,075	8,748	2,601		
2016	209,010	632	12,474	65	0.3%	0.5%	5	4,649	444	4,649	296		
2017	211,511	1,744	12,573	384	0.8%	3.1%	32	8,751	1,176	8,751	718		
2018	214,071	3,438	12,376	915	1.6%	7.4%	60	10,014	2,607	10,014	1,315		
2019	216,884	4,961	11,908	1,316	2.3%	11.1%	44	8,693	3,267	8,693	515		
2020	219,523	338	12,125	70	0.2%	0.6%	89	121	629	1,433	1,426		
2021	222,019	812	12,677	54	0.4%	0.4%	-	25	159	414	413		
2022	223,713	4,427	14,063	1,015	2.0%	7.2%	13	106	6,486	1,963	1,958		
2023	226,088	5,155	14,298	1,140	2.3%	8.0%	231	146	8,438	3,361	3,344		
2024	228,733	3,882	13,598	908	1.7%	6.7%	335	340	10,398	1,907	1,890		

* Data from 2015 is incomplete as MERC was transitioning to its new customer system

** Total Residential Customers (heating and non-heating)

*** Provided in Annual GAP Reports, which are filed 3/31 each year

	# of customers with payment arrangements	Average Monthly Payment Amount	Average Number of Months in Current Payment Agreements
Jan-24	2,497	$ 53.70	13
Feb-24	2,702	$ 57.29	11
Mar-24	2,842	$ 62.33	11
Apr-24	2,494	$ 69.84	12
May-24	1,956	$ 39.30	15
Jun-24	2,046	$ 31.66	15
Jul-24	2,005	$ 29.38	15
Aug-24	1,761	$ 33.30	15
Sep-24	1,594	$ 27.72	15
Oct-24	1,425	$ 30.33	15
Nov-24	1,421	$ 41.23	14
Dec-24	1,435	42.99	13

	Service Deposit Charged to Restore Service, Explain Practice **(Y or N)**	**If yes, Service Deposit Amount, Average per Customer**	Reconnection Fee Charged to Restore Service, Explain Practice **(Y or N)**	**If yes, Reconnection Fee Amount, Average per Customer**	Down Payment Required to restore service to start a payment arrangement, Explain Practice **(Y or N), also list practice (i.e minimum of 10% of past due)**	**If yes, Down Payment Amount, as Percent of Past Due Balance or Average Amount**	Interest/ Penalties/Fees, Explain Practice **(Y or N)**	**If yes, Interest/Penalties/Fee Amount, Average per Customer**
Jan-24	N		Y	$ 30.78	Y	19%	N	
Feb-24	N		Y	$ 29.93	Y	21%	N	
Mar-24	N		Y	$ 30.01	Y	22%	N	
Apr-24	N		Y	$ 30.00	Y	24%	N	
May-24	N		Y	$ 30.04	Y	36%	N	
Jun-24	N		Y	$ 30.00	Y	35%	N	
Jul-24	N		Y	$ 30.00	Y	35%	N	
Aug-24	N		Y	$ 30.00	Y	35%	N	
Sep-24	N		Y	$ 30.00	Y	31.96%	N	
Oct-24	N		Y	$ 30.43	Y	29.12%	N	
Nov-24	N		Y	$ 30.22	Y	27%	N	
Dec-24	N		Y	$ 30.64	Y	25.95%	N	

*Practice is defined as when an action would be taken.

	Electric Utilities Only			
	# Customers Requesting Medical Status	# Customers Granted Medical Status	# Medical Accounts Renewed	# Customers Denied Medical Status
Jan-24				
Feb-24				
Mar-24				
Apr-24				
May-24				
Jun-24				
Jul-24				
Aug-24				
Sep-24				
Oct-24				
Nov-24				
Dec-24				

Total Number of Disconnection Events

Data December - June Filed July 2024		Data July- November Filed December 2024	
Zip Code	Count	Zip Code	Count
55009	33	55009	12
55010	3	55024	24
55020	7	55032	1
55024	103	55037	6
55030	1	55044	55
55032	7	55051	11
55037	34	55054	2
55044	50	55056	7
55047	2	55057	1
55051	22	55063	10
55054	2	55068	44
55056	38	55069	3
55060	1	55072	13
55063	34	55088	2
55068	43	55121	3
55069	24	55122	34
55072	10	55123	17
55073	1	55337	1
55120	1	55372	1
55121	19	55614	1
55122	96	55705	6
55123	59	55707	1
55372	7	55708	4
55614	12	55709	6
55705	27	55713	2
55707	13	55716	4
55708	6	55718	1
55709	21	55719	16
55713	15	55720	17
55716	2	55722	6
55718	6	55734	14
55719	66	55735	1
55720	29	55736	2
55721	1	55741	3
55722	14	55744	13
55731	1	55750	4
55734	42	55753	3
55735	1	55767	4
55736	3	55769	4
55741	15	55783	1

Total Number of Disconnection Events

Data December - June Filed July 2024		Data July- November Filed December 2024	
55744	43	55792	1
55750	11	55795	3
55753	19	55810	8
55757	3	55811	6
55764	10	55901	28
55767	9	55902	15
55768	14	55904	45
55769	10	55906	11
55792	3	55909	2
55797	1	55917	4
55810	32	55918	1
55811	25	55920	3
55901	127	55921	1
55902	38	55922	1
55904	116	55924	1
55906	36	55927	5
55909	3	55932	1
55910	2	55934	2
55912	1	55940	2
55917	9	55943	1
55918	9	55944	13
55920	16	55946	5
55921	13	55947	3
55922	2	55952	1
55923	6	55960	6
55924	7	55962	1
55927	25	55963	6
55929	3	55964	2
55932	4	55965	2
55934	4	55970	1
55935	4	55971	1
55939	7	55972	1
55940	17	55974	2
55943	6	55975	9
55944	29	55976	10
55946	17	55982	1
55947	17	55985	6
55949	5	55990	2
55951	6	55992	2
55952	10	56007	35
55953	6	56009	1

Total Number of Disconnection Events

Data December - June Filed July 2024		Data July- November Filed December 2024	
55954	7	56016	4
55955	3	56029	1
55960	11	56031	22
55962	1	56032	2
55963	12	56036	2
55964	14	56042	1
55965	8	56045	1
55970	2	56072	1
55971	5	56075	2
55972	7	56083	1
55974	6	56088	1
55975	34	56089	1
55976	35	56097	7
55982	3	56101	7
55983	8	56119	1
55985	12	56120	1
55990	2	56136	3
55992	20	56142	3
56007	105	56143	4
56009	4	56150	2
56016	8	56152	1
56020	1	56159	5
56026	4	56166	1
56029	2	56171	1
56031	50	56175	6
56032	3	56176	5
56035	4	56180	3
56036	1	56187	20
56043	3	56208	4
56045	1	56220	4
56072	3	56229	2
56075	1	56256	4
56076	1	56278	4
56081	1	56431	11
56083	3	56437	1
56088	7	56441	3
56089	1	56444	1
56097	25	56455	2
56101	62	56464	4
56115	1	56470	7
56119	2	56479	23

Total Number of Disconnection Events

Data December - June Filed July 2024		Data July- November Filed December 2024	
56120	13	56481	6
56127	1	56482	21
56136	2	56501	7
56142	9	56510	10
56143	20	56511	2
56150	17	56544	8
56152	9	56601	28
56159	26	56623	2
56171	10	56636	10
56175	16	56649	16
56176	1	56701	20
56180	2	56751	2
56181	7	56763	9
56187	56		
56208	36		
56220	15		
56229	3		
56256	27		
56278	18		
56431	19		
56437	7		
56441	23		
56444	9		
56453	4		
56455	6		
56466	3		
56470	25		
56477	3		
56479	20		
56481	4		
56482	32		
56501	59		
56510	6		
56511	8		
56544	21		
56601	88		
56623	12		
56636	10		
56649	53		
56668	3		
56701	69		

Total Number of Disconnection Events

Data December - June Filed July 2024		Data July- November Filed December 2024
56751	24	
56763	14	

Attachment 5
Service Extension Requests

Service Extension Requests

	Residential		Commercial	
NEW	**New Installs**	**Avg time between requested date and install**	**New Installs**	**Avg time between requested date and install**
January	87	13	3	39
February	118	11	4	31
March	90	11	4	9
April	193	11	16	16
May	141	19	15	29
June	88	21	5	27
July	235	20	26	34
August	150	24	33	26
September	205	22	21	42
October	327	18	72	30
November	210	21	53	24
December	152	19	27	20
Year Total	**1,996**		**279**	
Yearly Ave.	**166**		**23**	

	Residential			Commercial		
EXISTING	**# of Existing Requested**	**# completed as requested**	**Avg Days between request and Completion**	**# of Existing Requested**	**# completed as requested**	**Avg Days between request and Completion**
January	144	143	0	17	17	0
February	128	128	0	14	14	0
March	137	137	0	9	9	0
April	164	162	0	10	10	0
May	348	348	0	18	18	0
June	355	354	0	6	6	0
July	410	410	0	7	7	0
August	359	358	0	19	19	0
September	422	420	0	21	21	0
October	841	836	0	53	53	0
November	546	546	0	63	63	0
December	238	238	0	32	32	0
Year Total	4,092	4,080		269	269	
Yearly Ave.	341	340		22	22	

Attachment 6
Complaints

Customer Complaints

	January				February				March				April				May				June			
Number of Complaints	12				65				42				49				68				100			
Type of Complaint	# of complaints Residential Class	% of complaints Residential Class	# of complaints Commercial Class	% of complaints Commercial Class	# of complaints Residential Class	% of complaints Residential Class	# of complaints Commercial Class	% of complaints Commercial Class	# of complaints Residential Class	% of complaints Residential Class	# of complaints Commercial Class	% of complaints Commercial Class	# of complaints Residential Class	% of complaints Residential Class	# of complaints Commercial Class	% of complaints Commercial Class	# of complaints Residential Class	% of complaints Residential Class	# of complaints Commercial Class	% of complaints Commercial Class	# of complaints Residential Class	% of complaints Residential Class	# of complaints Commercial Class	% of complaints Commercial Class
Billing/Meter Reading Issue	6	55%	0	0%	24	39%	3	75%	24	69%	5	71%	12	28%	2	33%	20	31%	2	50%	25	27%	5	56%
Employee Action / Behavior Issue	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Inaccurate Metering	1	9%	0	0%	0	0%	0	0%	2	6%	0	0%	2	5%	0	0%	0	0%	0	0%	1	1%	0	0%
Inadequate Service	0	0%	0	0%	2	3%	0	0%	2	6%	0	0%	7	16%	1	17%	10	16%	1	25%	9	10%	1	11%
"My bill is too high"	4	36%	1	25%	4	7%	1	25%	2	6%	1	14%	10	23%	3	50%	9	14%	0	0%	11	12%	1	11%
Service Extension Intervals	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Service Restoration Intervals	0	0%	0	0%	16	26%	0	0%	4	11%	0	0%	3	7%	0	0%	19	30%	0	0%	27	30%	1	11%
Wrongful Disconnections	0	0%	0	0%	1	2%	0	0%	0	0%	0	0%	0	0%	0	0%	1	2%	0	0%	0	0%	0	0%
Other	0	0%	0	0%	14	23%	0	0%	1	3%	1	14%	9	21%	0	0%	5	8%	1	25%	18	20%	1	11%
Time To Resolve Complaint																								
Initially	3				53				35				44				61				95			
Within 10 days	9				12				7				5				7				5			
> than 10 days	0				0				0				0				0				0			
Complaint Resolution	# Resolved by taking the listed action	% Resolved by taking the listed action			# Resolved by taking the listed action	% Resolved by taking the listed action			# Resolved by taking the listed action	% Resolved by taking the listed action			# Resolved by taking the listed action	% Resolved by taking the listed action			# Resolved by taking the listed action	% Resolved by taking the listed action			# Resolved by taking the listed action	% Resolved by taking the listed action		
Taking action as customer requested	8	67%			35	54%			20	48%			19	39%			7	10%			10	10%		
Agreeable compromise	4	33%			26	40%			1	2%			26	53%			57	84%			87	87%		
Not within the control of the utility	0	0%			4	6%			20	48%			3	6%			1	1%			1	1%		
Refuse to customer requested action	0	0%			0	0%			1	2%			1	2%			3	4%			2	2%		
BBB Complaints	1				0				2				1				0				1			
OAG Complaints	0				3				0				0				0				0			
PUC Complaints	4				5				5				3				5				4			

Customer Complaints

Type of Complaint	July # of complaints Residential Class	July % of complaints Residential Class	July # of complaints Commercial Class	July % of complaints Commercial Class	August # of complaints Residential Class	August % of complaints Residential Class	August # of complaints Commercial Class	August % of complaints Commercial Class	September # of complaints Residential Class	September % of complaints Residential Class	September # of complaints Commercial Class	September % of complaints Commercial Class
Number of Complaints	66				91				84			
Billing/Meter Reading Issue	18	29%	0	0%	32	38%	4	67%	36	45%	3	75%
Employee Action / Behavior Issue	0	0%	0	0%		0%		0%		0%		0%
Inaccurate Metering	1	2%	0	0%		0%		0%		0%		0%
Inadequate Service	8	13%	0	0%	12	14%		0%	9	11%		0%
"My bill is too high"	14	23%	3	75%	17	20%	2	33%	11	14%	1	25%
Service Extension Intervals	0	0%	0	0%		0%		0%		0%		0%
Service Restoration Intervals	13	21%	0	0%	14	16%		0%	14	18%		0%
Wrongful Disconnections	0	0%	0	0%		0%		0%		0%		0%
Other	8	13%	1	25%	10	12%		0%	10	13%		0%

Type of Complaint	October # of complaints Residential Class	October % of complaints Residential Class	October # of complaints Commercial Class	October % of complaints Commercial Class	November # of complaints Residential Class	November % of complaints Residential Class	November # of complaints Commercial Class	November % of complaints Commercial Class	December # of complaints Residential Class	December % of complaints Residential Class	December # of complaints Commercial Class	December % of complaints Commercial Class
Number of Complaints	102				57				95			
Billing/Meter Reading Issue	37	40%	6	67%	25	47%	1	25%	24	27%	1	20%
Employee Action / Behavior Issue		0%		0%		0%		0%		0%		0%
Inaccurate Metering	1	1%	1	11%		0%		0%		0%		0%
Inadequate Service	14	15%		0%	9	17%	1	25%	3	3%	1	20%
"My bill is too high"	8	9%	1	11%	6	11%	1	25%	41	46%	2	40%
Service Extension Intervals		0%		0%		0%		0%		0%		0%
Service Restoration Intervals	27	29%	1	11%	7	13%	1	25%	14	16%	1	20%
Wrongful Disconnections		0%		0%		0%		0%		0%		0%
Other	6	6%		0%	6	11%		0%	8	9%		0%

Type of Complaint	Total # of complaints Residential Class	Total % of complaints Residential Class	Total # of complaints Commercial Class	Total % of complaints Commercial Class
Number of Complaints	831			
Billing/Meter Reading Issue	283	37%	32	51%
Employee Action / Behavior Issue	0	0%	0	0%
Inaccurate Metering	8	1%	1	2%
Inadequate Service	85	11%	5	8%
"My bill is too high"	137	18%	17	27%
Service Extension Intervals	0	0%	0	0%
Service Restoration Intervals	158	21%	4	6%
Wrongful Disconnections	2	0%	0	0%
Other	95	12%	4	6%

Time To Resolve Complaint	July	August	September	October	November	December	Total	Percentage
Initially	60	87	81	99	53	95	766	92.18%
Within 10 days	6	4	3	3	4	0	65	7.82%
> than 10 days	0				0	0	0	0.00%

Complaint Resolution	July # Resolved by taking the listed action	July % Resolved by taking the listed action	August # Resolved by taking the listed action	August % Resolved by taking the listed action	September # Resolved by taking the listed action	September % Resolved by taking the listed action
Taking action as customer requested	6	9%	5	5%	5	6%
Agreeable compromise	58	88%	84	92%	77	92%
Not within the control of the utility	2	3%	2	2%	2	2%
Refuse to customer requested action	0	0%		0%		0%

Complaint Resolution	October # Resolved by taking the listed action	October % Resolved by taking the listed action	November # Resolved by taking the listed action	November % Resolved by taking the listed action	December # Resolved by taking the listed action	December % Resolved by taking the listed action	Total # Resolved by taking the listed action	Percent # Resolved by taking the listed action
Taking action as customer requested	3	3%	9	16%	14	15%	141	16.97%
Agreeable compromise	97	95%	48	84%	81	85%	646	77.74%
Not within the control of the utility	1	1%		0%		0%	36	4.33%
Refuse to customer requested action	1	1%		0%		0%	8	0.96%

	July	August	September	October	November	December	Total	Annual Ave.
BBB Complaints	1				0	0	6	0.7
OAG Complaints	0	3	1	1	1	0	9	0.8
PUC Complaints	5	4	4	2	2	1	44	3.7

Minnesota Public Utilities Commission
Consumer Affairs Office
121 7th Place East #350
St. Paul, MN 55101-2147

ANNUAL SUMMARY OF CUSTOMER COMPLAINTS
For Year End: 2024 Due May 1st Docket 377
In accordance with MINN. Reg. PSC 284

Name of Utility: Minnesota Energy Resources
Address: 2685 145th Street West, Rosemount, MN 55068
Prepared By: Misty Livingston-West 651-322-8908

****

	Residential			Commercial/Industrial			Interruptible		
	Number Received	*Number Resolved*	*Number Unresolved*	***Number Received***	***Number Resolved***	***Number Unresolved***	*Number Received*	*Number Resolved*	*Number Unresolved*
I. Complaint Type									
A. Service	339	339	0	13	13	0			
B. Billing	292	292	0	33	33	0			
C. Rates	0	0	0	0	0	0			
D. Rules	137	137	0	17	17	0			
TOTAL COMPLAINTS	**768**	**768**	**0**	**63**	**63**	**0**	**0**	**0**	**0**

****

	Residential	Commercial/ Industrial	Interruptible
II. A. Number of Disconnections for Nonpayment	3,882	263	0
B. Number of Escrow Forms Filed (per PSC Rule 302G)	0	0	0
III. A. Total Number of Customers (year end)	228,733	24,107	416
B. Number of Customer's Added During Year	2,645	259	-9

NUMBER OF DISCONNECTS
FOR NON-PAYMENT
(By Month)

	1	2	3
JAN	45	14	
FEB	37	25	
MAR	26	35	
APR	56	38	
MAY	1840	42	
JUNE	933	51	
JULY	544	24	
AUG	225	4	
SEPT	168	13	
OCT	1	5	
NOV	2	6	
DEC	5	6	
TOTAL	**3,882**	**263**	**0**

1. Residential
2 Commercial/Industrial
3. Interruptible

Attachment 7
Gas Emergency Response

Telephone Answer Times

Answer time for gas emergency phone lines

	January	February	March	April	May	June	July	August	September	October	November	December	Total	YTD Average
Total Calls	1,908	1,378	1,470	1,531	1,913	1,674	1,666	1,603	1,631	2,401	1,799	1,772	20,746	1,729
Average Speed of Answer	7	5	6	9	11	10	9	7	8	6	7	8		8
% Answered in 15 seconds	94.23%	95.65%	93.13%	89.91%	87.61%	89.78%	90.16%	92.64%	91.48%	92.92%	92.11%	90.86%		92%

Tech Response Time From Time of Call to Arrival

	January	February	March	April	May	June	July	August	September	October	November	December	Total
Calls responded to in Under 1 hour	502	334	359	343	423	339	367	351	460	516	456	457	4,907
Calls responded to in Over 1 hour	25	14	17	15	30	17	19	18	16	25	29	38	263
Total Calls	527	348	376	358	453	356	386	369	476	541	485	495	5,170

Calls Responded to in Under 1 Hour

	NW Region	NE Region	CN Region	SE Region	SW Region	Total
January	47	66	169	135	85	502
February	22	32	124	95	61	334
March	44	33	116	103	63	359
April	35	52	114	96	46	343
May	33	60	136	131	63	423
June	17	53	104	118	47	339
July	15	48	163	91	50	367
August	13	61	109	103	65	351
September	31	62	132	158	77	460
October	41	83	130	154	108	516
November	41	77	165	124	49	456
December	40	58	155	133	71	457
YTD Total	**379**	**685**	**1617**	**1441**	**785**	**4907**
Annual Ave.	**32**	**57**	**135**	**120**	**65**	**409**

Month	MERC Emergency Response Time in Minutes
January	29.00
February	25.00
March	27.00
April	26.00
May	28.00
June	28.00
July	28.00
August	26.00
September	27.00
October	26.00
November	28.00
December	32.00
Annual Average	27.00

Calls Responded to in Over 1 Hour

	NW Region	NE Region	CN Region	SE Region	SW Region	Total
January	3	2	4	8	8	25
February	4	0	4	1	5	14
March	7	2	0	2	6	17
April	5	1	3	5	1	15
May	12	3	6	2	7	30
June	1	5	2	3	6	17
July	3	4	1	9	2	19
August	0	2	4	4	8	18
September	4	5	1	1	5	16
October	4	5	1	2	13	25
November	10	4	5	4	6	29
December	5	8	7	4	14	38
YTD Total	**58**	**41**	**38**	**45**	**81**	**263**
Annual Ave.	**5**	**3**	**3**	**4**	**7**	**22**

Attachment 7A
Gas Emergency Response – No Farm Taps

Tech Response Time From Time of Call to Arrival

	January	February	March	April	May	June	July	August	September	October	November	December	Total
Calls responded to in Under 1 hour	499	334	359	343	417	327	359	348	455	513	453	455	4,862
Calls responded to in Over 1 hour	25	12	17	15	27	17	19	16	16	24	28	36	252
Total Calls	524	346	376	358	444	344	378	364	471	537	481	491	5,114

Calls Responded to in Under 1 Hour

	NW Region	NE Region	CN Region	SE Region	SW Region	Total
January	47	66	166	135	85	499
February	22	32	124	95	61	334
March	44	33	116	103	63	359
April	35	52	114	96	46	343
May	33	60	132	131	61	417
June	17	50	103	116	41	327
July	15	46	162	89	47	359
August	13	60	109	102	64	348
September	31	62	130	155	77	455
October	41	82	130	153	107	513
November	41	76	163	124	49	453
December	40	57	154	133	71	455
YTD Total	**379**	**676**	**1603**	**1432**	**772**	**4862**
Annual Ave.	**32**	**56**	**134**	**119**	**64**	**405**

Month	MERC Emergency Response Time in Minutes (No Farm Taps)
January	29.00
February	25.00
March	27.00
April	26.00
May	28.00
June	28.00
July	28.00
August	26.00
September	27.00
October	26.00
November	28.00
December	29.00
YTD Average	27.00

Calls Responded to in Over 1 Hour

	NW Region	NE Region	CN Region	SE Region	SW Region	Total
January	3	2	4	8	8	25
February	4	0	2	1	5	12
March	7	2	0	2	6	17
April	5	1	3	5	1	15
May	12	3	3	2	7	27
June	1	5	2	3	6	17
July	3	4	1	9	2	19
August	0	2	2	4	8	16
September	4	5	1	1	5	16
October	4	5	0	2	13	24
November	10	4	4	4	6	28
December	5	8	5	4	14	36
YTD Total	**58**	**41**	**27**	**45**	**81**	**252**
Annual Ave.	**5**	**3**	**2**	**4**	**7**	**21**

Attachment 7B
Gas Emergency Response –Farm Tap Only

Tech Response Time From Time of Call to Arrival

	January	February	March	April	May	June	July	August	September	October	November	December	Total
Calls responded to in Under 1 hour	3	0	0	0	6	12	8	3	5	3	3	2	45
Calls responded to in Over 1 hour	0	2	0	0	3	0	0	2	0	1	1	2	11
Total Calls	3	2	0	0	9	12	8	5	5	4	4	4	56

Farm Tap Calls responded to in Under 1 hour

	NW Region	NE Region	CN Region	SE Region	SW Region	Total
January	0	0	3	0	0	3
February	0	0	0	0	0	0
March	0	0	0	0	0	0
April	0	0	0	0	0	0
May	0	0	4	0	2	6
June	0	3	1	2	6	12
July	0	2	1	2	3	8
August	0	1	0	1	1	3
September	0	0	2	3	0	5
October	0	1	0	1	1	3
November	0	1	2	0	0	3
December	0	1	1	0	0	2
YTD Total	**0**	**9**	**14**	**9**	**13**	**45**
Annual Ave.	**-**	**1**	**1**	**1**	**1**	**4**

Month	MERC Emergency Response Time in Minutes (Farm Taps Only)
January	30.00
February	73.00
March	0.00
April	0.00
May	47.00
June	33.00
July	33.00
August	67.00
September	47.00
October	42.00
November	35.00
December	59.00
YTD Average	45.00

Farm Tap Calls responded to in Over 1 hour

	NW Region	NE Region	CN Region	SE Region	SW Region	Total
January	0	0	0	0	0	0
February	0	0	2	0	0	2
March	0	0	0	0	0	0
April	0	0	0	0	0	0
May	0	0	3	0	0	3
June	0	0	0	0	0	0
July	0	0	0	0	0	0
August	0	0	2	0	0	2
September	0	0	0	0	0	0
October	0	0	1	0	0	1
November	0	0	1	0	0	1
December	0	0	2	0	0	2
YTD Total	**0**	**0**	**11**	**0**	**0**	**11**
Annual Ave.	**-**	**-**	**1**	**-**	**-**	**1**

Attachment 8
Excavation Damages

Excavation Damages

	January	February	March	April	May	June	July	August	September	October	November	December	Total
# of Excavation Tickets	1,972	2,582	4,705	11,570	14,011	11,788	13,061	11,793	12,747	13,309	6,685	2,312	106,535
# of Excavation Damages	2	5	6	17	15	20	30	19	43	36	15	6	214
Damages per 1,000 Tickets	1.01	1.94	1.28	1.47	1.07	1.70	2.30	1.61	3.37	2.70	2.24	2.60	2.01

At Fault Damages - Company Employee or Company Contractor	2	1	4	8	3	7	6	1	-	5	3	2	42
Damage by Others	-	4	2	9	12	13	24	18	43	31	12	4	172
System issue	-	-	-	-	-	-	-	-					-
Total Excavation Damages	**2**	**5**	**6**	**17**	**15**	**20**	**30**	**19**	**43**	**36**	**15**	**6**	**214**

Attachment 9
Service Interruptions

Service Interruptions

Outages Due to Employees/Contractors	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Annual Average
Number of Customers:	2	4	26	257	4	7	3	2	-	8	4	2	319	27
Number of Outages:	3	1	3	8	2	7	4	1	-	5	3	2	39	3
Average Duration of Outage(In Minutes):	105	345	123	300	217	123	157	297	-	285	104	81		226

Outages Due to All Other Causes	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Annual Average
Number of Customers:	1	47	9	11	25	12	78	26	85	30	37	7	368	31
Number of Outages:	1	7	4	8	18	12	22	16	37	26	12	4	167	14
Average Duration of Outage(In Minutes):	105	100	350	252	208	176	124	100	165	130	205	1,021		182

Attachment 9A
Service Interruption Detail

Service Interruptions
[PRIVATE DATA BEGINS...

Date	Address	City	Number of Customers Affected	Outage Duration (Minutes)	Outage Caused by MERC Employee or MERC Contractor	Outage Caused by Other
1/14/2024	[redacted]	[redacted]	1	105	No	Yes
1/25/2024			1	145	Yes	No
1/26/2024			0	170	Yes	No
2/15/2024			1	60	No	Yes
2/21/2024			1	56	No	Yes
2/23/2024			40	120	No	Yes
2/24/2024			1	52	No	Yes
2/26/2024			2	95	No	Yes
2/26/2024			4	345	Yes	No
2/27/2024			1	110	No	Yes
2/27/2024			1	210	No	Yes
3/4/2024			2	420	No	Yes
3/4/2024			1	125	Yes	No
3/12/2024			1	91	Yes	No
3/13/2024			1	67	No	Yes
3/15/2024			24	240	Yes	No
3/18/2024			1	720	No	Yes
3/29/2024			5	192	No	Yes
4/4/2024			2	259	Yes	No
4/5/2024			1	60	No	Yes
4/9/2024			1	39	No	Yes
4/11/2024			10	337	Yes	No
4/16/2024			1	40	Yes	No
4/17/2024			1	120	Yes	No
4/17/2024			1	1085	Yes	No
4/18/2024			1	150	No	Yes
4/19/2024			1	202	Yes	No
4/21/2024			1	1038	No	Yes
4/21/2024			1	100	No	Yes
4/22/2024			1	428	Yes	No
4/23/2024			1	82	No	Yes
4/25/2024			4	459	No	Yes
4/27/2024			1	90	No	Yes
4/30/2024			240	320	Yes	No
5/1/2024			1	85	No	Yes
5/6/2024			2	247	Yes	No
5/6/2024			1	60	No	Yes
5/8/2024			2	265	No	Yes
5/9/2024			1	1440	No	Yes
5/9/2024			1	200	No	Yes
5/9/2024			1	60	No	Yes
5/13/2024			4	600	No	Yes
5/13/2024			1	67	No	Yes
5/14/2024			1	110	No	Yes
5/14/2024			1	85	No	Yes
5/17/2024			1	120	No	Yes
5/19/2024			1	120	No	Yes
5/21/2024			4	258	No	Yes
5/23/2024			2	226	Yes	No
5/23/2024			1	84	No	Yes
5/24/2024			1	10	No	Yes
5/29/2024			1	60	No	Yes

...PRIVATE DATA ENDS]

Date	Address	City	Number of Customers Affected	Outage Duration (Minutes)	Outage Caused by MERC Employee or MERC Contractor	Outage Caused by Other
5/29/2024	[redacted]	[redacted]	1	90	No	Yes
5/29/2024			1	30	No	Yes
6/3/2024			1	950	No	Yes
6/3/2024			1	178	No	Yes
6/7/2024			1	107	No	Yes
6/7/2024			1	105	No	Yes
6/10/2024			1	33	No	Yes
6/11/2024			1	99	Yes	No
6/11/2024			1	40	No	Yes
6/11/2024			1	274	No	Yes
6/11/2024			1	90	Yes	No
6/14/2024			1	90	No	Yes
6/14/2024			1	109	No	Yes
6/14/2024			1	249	Yes	No
6/14/2024			2	55	Yes	No
6/20/2024			1	56	No	Yes
6/21/2024			1	35	No	Yes
6/24/2024			1	60	Yes	No
6/24/2024			1	137	No	Yes
6/29/2024			1	185	Yes	No
7/1/2024			1	45	No	Yes
7/1/2024			1	120	No	Yes
7/2/2024			4	65	No	Yes
7/3/2024			0	95	No	Yes
7/8/2024			1	18	No	Yes
7/8/2024			1	211	No	Yes
7/9/2024			1	105	No	Yes
7/11/2024			1	135	No	Yes
7/11/2024			15	330	No	Yes
7/15/2024			1	90	No	Yes
7/15/2024			2	45	No	Yes
7/15/2024			39	273	No	Yes
7/16/2024			2	261	No	Yes
7/16/2024			1	217	No	Yes
7/17/2024			1	142	No	Yes
7/22/2024			1	57	No	Yes
7/23/2024			1	52	No	Yes
7/23/2024			1	60	No	Yes
7/23/2024			1	115	No	Yes
7/23/2024			1	70	Yes	No
7/23/2024			1	78	No	Yes
7/23/2024			1	295	Yes	No
7/24/2024			1	107	Yes	No
7/25/2024			1	147	No	Yes
7/25/2024			1	60	No	Yes
7/26/2024			1	630	Yes	No
8/5/2024			1	165	No	Yes
8/6/2024			1	100	No	Yes
8/8/2024			1	96	No	Yes
8/8/2024			1	45	No	Yes
8/9/2024			1	0	No	Yes
8/9/2024			1	75	No	Yes

Date	Address	City	Number of Customers Affected	Outage Duration (Minutes)	Outage Caused by MERC Employee or MERC Contractor	Outage Caused by Other
8/12/2024	[redacted]	[redacted]	1	60	No	Yes
8/12/2024			2	297	Yes	No
8/13/2024			4	205	No	Yes
8/14/2024			5	120	No	Yes
8/19/2024			1	65	No	Yes
8/22/2024			2	60	No	Yes
8/22/2024			1	75	No	Yes
8/22/2024			1	50	No	Yes
8/27/2024			1	289	No	Yes
8/27/2024			3	87	No	Yes
8/31/2024			1	100	No	Yes
9/4/2024			1	80	No	Yes
9/5/2024			1	240	No	Yes
9/6/2024			28	135	No	Yes
9/8/2024			1	960	No	Yes
9/9/2024			1	60	No	Yes
9/9/2024			0	48	No	Yes
9/9/2024			1	54	No	Yes
9/10/2024			1	96	No	Yes
9/10/2024			1	112	No	Yes
9/11/2024			1	60	No	Yes
9/11/2024			1	156	No	Yes
9/11/2024			1	60	No	Yes
9/12/2024			1	45	No	Yes
9/12/2024			1	434	No	Yes
9/13/2024			1	83	No	Yes
9/13/2024			1	47	No	Yes
9/13/2024			1	64	No	Yes
9/13/2024			1	107	No	Yes
9/16/2024			1	50	No	Yes
9/16/2024			1	449	No	Yes
9/18/2024			1	75	No	Yes
9/18/2024			2	124	No	Yes
9/18/2024			1	136	No	Yes
9/19/2024			19	417	No	Yes
9/19/2024			1	62	No	Yes
9/23/2024			1	54	No	Yes
9/23/2024			1	103	No	Yes
9/23/2024			1	360	No	Yes
9/24/2024			1	96	No	Yes
9/24/2024			1	379	No	Yes
9/24/2024			1	118	No	Yes
9/24/2024			1	119	No	Yes
9/25/2024			4	230	No	Yes
9/25/2024			1	209	No	Yes
9/27/2024			1	101	No	Yes
9/27/2024			1	140	No	Yes
9/30/2024			1	45	No	Yes
10/1/2024			1	210	No	Yes
10/1/2024			1	199	No	Yes
10/1/2024			1	60	No	Yes
10/2/2024			1	155	No	Yes

Date	Address	City	Number of Customers Affected	Outage Duration (Minutes)	Outage Caused by MERC Employee or MERC Contractor	Outage Caused by Other
10/2/2024	[redacted]	[redacted]	1	225	No	Yes
10/2/2024			1	104	No	Yes
10/2/2024			1	68	No	Yes
10/2/2024			1	365	Yes	No
10/3/2024			1	135	No	Yes
10/3/2024			1	188	No	Yes
10/5/2024			1	60	No	Yes
10/7/2024			1	65	No	Yes
10/7/2024			1	257	No	Yes
10/9/2024			2	142	No	Yes
10/9/2024			3	67	No	Yes
10/10/2024			1	157	No	Yes
10/11/2024			1	131	No	Yes
10/14/2024			1	90	No	Yes
10/16/2024			1	30	No	Yes
10/16/2024			1	80	No	Yes
10/17/2024			1	309	Yes	No
10/24/2024			2	80	No	Yes
10/25/2024			1	120	No	Yes
10/25/2024			1	81	No	Yes
10/28/2024			5	259	Yes	No
10/28/2024			1	313	No	Yes
10/29/2024			1	123	No	Yes
10/30/2024			1	125	No	Yes
10/30/2024			1	125	No	Yes
10/31/2024			1	210	Yes	No
11/1/2024			2	150	No	Yes
11/1/2024			1	46	Yes	No
11/2/2024			1	51	No	Yes
11/2/2024			1	30	No	Yes
11/3/2024			1	785	No	Yes
11/7/2024			1	60	No	Yes
11/11/2024			5	165	No	Yes
11/15/2024			2	155	Yes	No
11/15/2024			3	276	No	Yes
11/19/2024			1	110	No	Yes
11/19/2024			2	300	No	Yes
11/20/2024			18	305	No	Yes
11/27/2024			1	110	Yes	No
11/27/2024			1	150	No	Yes
11/30/2024			1	81	No	Yes
12/9/2024			1	66	No	Yes
12/9/2024			1	60	Yes	No
12/10/2024			1	102	Yes	No
12/13/2024			1	3681	No	Yes
12/21/2024			4	149	No	Yes
12/26/2024			1	186	No	Yes

Attachment 10
MNOPS Reportable Events

Date	Address	Outage Caused by	Number of Customers Affected	Number of People Evacuated	Outage Duration	Longest Time any Customer was without gas	Root Cause of Incident	Actions Taken to Fix Problem	Actions Taken to Contact Customers	Media Attention	Did Customer or Company Relight	How was Company Notified
2/23/2024	[redacted]	No outage; Class 3 leak. Customer called in smelling gas outside	1	40	120	120	Gasket failed	Took out strainer. Cleaned surfaces and replaced gasket	On-site with Customer and Maintenance	Yes	Customer (Maintenance)	Customer
2/26/2024	[redacted]	Excavator	2	20	95	315	Contract locator failed to locate service line withing locate scope resulting in unmarked line being hit.	Line squeezed off and repaired by NPL.	Immediate at location contact.	No	Company	Customer
4/30/2024	[redacted]	Stopping a single feed main	240	0	320	320	Gas flow was stopped on a single feed system causing the outage	Gas meters were shutoff and locked off after the outage to allow gas to be reintroduced to the system. Raised line stoppers, followed purge procedures. Started relight process	City facebook page, company facebook page, knocked on doors, called customers	No	Company	MERC
5/8/2024	[redacted]	Directional Boring	2	20	265	265	Contractor hit an abandon service line with a 10 Ft. stub off of main.	MERC technician dug up main squeezed to stop gas release than proceeded to identify where gas system was damaged, NPL than made repairs.	Customer were at premise relights complete.	No	Company	Third Party
5/21/2024	[redacted]	No Outage	1	92	No Outage	N/A	Leak call at childcare facility. 92 evacuated before MERC arrival.	Multiple leaks found on customer piping. Meter locked off until company plumbing contractor make required repairs	Customer Call	No	N/A	Customer
6/15/2024	[redacted]	No Outage	1	49	No Outage	N/A	Customer called in smelling gas or CO when entering the backdoor of building, was advised by the call center to evacuate the building. MERC technicians perform standard leak investigation found no leaks or CO in building. Did get a read of 65 ppm in furnace exhaust vent piping when tested, this is considered within normal range but advised customer to have furnace service.	MERC technician performed standard leak investigation, No leaks detected.	Customer Call	No	N/A	Customer
6/24/2024	[redacted]	Backhoe	0	0	No Outage	N/A	Incorrect facility records	Squeezed and put on a bypass	No customers affected	No	N/A	Third Party

Date	Address	Outage Caused by	Number of Customers Affected	Number of People Evacuated	Outage Duration	Longest Time any Customer was without gas	Root Cause of Incident	Actions Taken to Fix Problem	Actions Taken to Contact Customers	Media Attention	Did Customer or Company Relight	How was Company Notified
7/15/2024	[redacted]	HDD (Bore Rig)	39	18	273	540	Contractor potholed the 2in PE with a vac truck then they read the depth wrong causing them to drill directly into the gas main	NPL and MERC had to squeeze off a 2in steel and 4in PE to stop gas flow. Once gas flow was stopped the repairs began.	Knock and talk at customer premises (door tagged if not home)	No	Company	Contractor
7/23/2024	[redacted]	Payloader	1	95	60	60	No Ticket-Locate not requested	Tech arrived, made scene safe. EFV had kicked in, squeezed off and capped service line. Service line needs to be relocated after road construction is completed.	On Site	No	Company	Customer
7/23/2024	[redacted]	Plow Rig (fiber contractor)	1	0	295	295	USIC Did not mark facility	Talked with locator and locators Supervisor	Customer relit same day	No	Company	Emergency Services
7/25/2024	[redacted]	Excavator	1	1	147	147	Excavator failed to hand dig within tolerance range of marked utility resulting in hit line causing blowing gas.	Line squeezed off and repaired by NPL.	Face to face	No	Company	Contractor
9/9/2024	[redacted]	Fiber Install (plow)	0	0	No Outage	N/A	USIC failed to locate the 4in P.E. crossing the Interstate on the East shoulder	Line was squeezed and repaired by NPL	N/A	No	N/A	Customer
9/16/2024	[redacted]	Drill Bore Head	1	0	449	449	Contractor hit unmarked 4" PE main with dir. Bore machine head	NPL got the line squeezed off on each side of the damaged area and ran a bypass around the section of pipe that was damaged. NPL had to install a new section of 4" MDPE pipe.	MERC techs informed customer that gas service would be interrupted until the fix is complete	No	Company	Emergency Services
9/19/2024	[redacted]	No Outage	1	60	No Outage	N/A	Customer called in a gas leak because of gas odor smelled by meter set, also evacuated 60 student and faculty. Conducted standard leak investigation and found a non-hazardous class 3 leak on flange joint of strainer fitting.	MERC technician preformed standard leak investigation and verified scene was safe.	Customer called in the gas leak, when leak investigation was completed the technician briefed all parties on his findings.	No	N/A	Emergency Services

[PRIVATE DATA BEGINS...

Date	Address	Outage Caused by	Number of Customers Affected	Number of People Evacuated	Outage Duration	Longest Time any Customer was without gas	Root Cause of Incident	Actions Taken to Fix Problem	Actions Taken to Contact Customers	Media Attention	Did Customer or Company Relight	How was Company Notified
10/7/2024	[redacted]	Skid Loader	18	25	257	322	Marks not maintained/Dug on obliterated marks	Checked out area to make sure scene was safe, squeezed off pipe in 2 locations and used a valve to shut off from 3 direction. NPL made repairs to main.	Went to each home and left door tags for customers not home.	No	Company	Third Party

Note ** There are times when a customer is not immediately available to have the gas turned back on after the Outage has been remedied, which can cause the ***Time Any Customer is Without Gas*** to be a longer duration than Time of the ***Outage Duration*** .

...PRIVATE DATA ENDS]

Attachment 11
MNOPS Violations

MNOPS Violations

Type of Correspondence	Date Receieved	Subject	Citation/Code	Description of Violation	Remediation
Notice of Probable Violation	1/26/2024	Pipeline Failure - 3rd Party Damage	Minn. Stat. 216D.04 Sub 3 (a) - Excavation, land survey. Prior to the conclusion of the locate period, an operator must locate and mark or otherwise provide the approximate horizontal location of the underground facilities of the operator and provide readily available information regarding the operator's abandoned and out-of-service underground facilities as shown on maps, drawings, diagrams, or other records used in the operator's normal course of business, without cost to the excavator. The excavator must determine the precise location of the underground facility, without damage, before excavating within two feet of the marked location of the underground facility.	On October 24, 2023, while conducting excavation activities at 721 8th St. in Farmington, MN, third-party contacted and damaged a Minnesota Energy Resources 2-inch plastic main. Under Gopher State One Call excavation notice 232820328, this main was not accurately located and marked as required per MS216D.04 Sub. 3(a). The mislocate in this situation resulted in the loss of gas service to 83 customers.	MERC reviewed this incident with it's locating contractor and worked with MNOPS conducting a locate ticket audit to ensure quality locates and were completed by the locate technician and no other issues were found. MERC was assessed a penalty of $2,500.
Notice of Probable Violation	2/20/2024	420-Field & Records (F&R) Inspection	192.465(b) - External corrosion control: Monitoring Each cathodic protection rectifier or other impressed current power source must be inspected six times each calendar year, but with intervals not exceeding 2-1/2 months, to ensure adequate amperage and voltage levels needed to provide cathodic protection are maintained.	For calendar years 2020-2023 in the Central Region, a single instance was discovered in which a rectifier inspection was not completed within the required 2.5 month interval. • 78-day gap on Camp Ripley rectifier, 5/19/2020 and 7/20/2021	OM Section 41.14 lists to Inspect each cathodic protection rectifier, to ensure proper operation, a minimum of six times each calendar year with intervals not to exceed 2-1/2 months. A compliance task has been added for ensuring rectifier readings are taken within the required timelines.
Notice of Probable Violation	3/26/2024	420-Field & Records (F&R) Inspection	192.455(d) - External corrosion control: Buried or submerged pipelines installed after July 31, 1971 (d) Notwithstanding the provisions of paragraph (b) or (c) of this section, if a pipeline is externally coated, it must be cathodically protected in accordance with paragraph (a)(2) of this section.	In Chisholm, MN a rectifier was discovered that had been de-energized to allow for a welding project. The rectifier was not turned back on after welding was completed and was left off for the entire weekend until it was discovered during the field audit.	MERC will incorporate a compliance task anytime a rectifier is taken out of service to ensure that the unit is returned to service when a project on the system is completed to meet cathodic protection requirments.
Notice of Probable Violation	3/26/2024	420-Field & Records (F&R) Inspection	192.465(b) - External corrosion control: Monitoring Cathodic protection rectifiers and impressed current power sources must be periodically inspected as follows: (1) Each cathodic protection rectifier or impressed current power source must be inspected six times each calendar year, but with intervals not exceeding 2 ½ months between inspections, to ensure adequate amperage and voltage levels needed to provide cathodic protection are maintained. This may be done either through remote measurement or through an onsite inspection of the rectifier. (2) After January 1, 2022, each remotely inspected rectifier must be physically inspected for continued safe and reliable operation at least once each calendar year, but with intervals not exceeding 15 months.	For calendar years 2020-2023 in the NE Region, a total of 4 instances were discovered in which a rectifier inspection was not completed within the required 2.5 month interval.	MERC will incorporate a compliance task anytime a rectifier is taken out of service to ensure that the unit is returned to service when a project on the system is completed to meet cathodic protection requirments.
Notice of Probable Violation	3/26/2024	420-Field & Records (F&R) Inspection	192.605(b) - Procedural manual for operations, maintenance, and emergencies. Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations. (1) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and Subpart M of this part. (2) Controlling corrosion in accordance with the operations and maintenance requirements of Subpart I of this part. (3) Making construction records, maps, and operating history available to appropriate operating personnel. (4) Gathering of data needed for reporting incidents under Part 191 of this chapter in a timely and effective manner. (5) Starting up and shutting down any part of the pipeline in a manner designed to assure operation within the MAOP limits prescribed by this part, plus the build-up allowed for operation of pressure-limiting and control devices. (6) Maintaining compressor stations, including provisions for isolating units or sections of pipe and for purging before returning to service. (7) Starting, operating and shutting down gas compressor units. (8) Periodically reviewing the work done by operator personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance and modifying the procedure when deficiencies are found (9) Taking adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapor or gas, and making available when needed at the excavation, emergency rescue equipment, including a breathing apparatus and, a rescue harness and line. (10) Systematic and routine testing and inspection of pipe-type or bottle-type holders including (i) Provision for detecting external corrosion before the strength of the container has been impaired; (ii) Periodic sampling and testing of gas in storage to determine the dew point of vapors contained in the stored gas which, if condensed, might cause internal corrosion or interfere with the safe operation of the storage plant; and, (iii) Periodic inspection and testing of pressure limiting equipment to determine that it is in safe operating condition and has adequate capacity. (11) Responding promptly to a report of a gas odor inside or near a building, unless the operator's emergency procedures under § 192.615(a)(3) specifically apply to these reports.	Customer meter #20178172 in Bovey, MN was identified as being within 3 feet of an ignition source. This meter was previously inspected by a MERC technician during normal operations and was listed as having appropriate setbacks from ignition sources. The technician had measured the distance to a nearby AC unit but failed to account for the nearby electrical disconnect.	MERC conducted statewide training referencing TEG 610 and 192 requirements for identifying and documenting potential ignition sources during meter set surveys. MERC has also implemented a process where MERC supervisors audit a percentage of the meter set surveys performed annually to assure that surveys are conducted accurately. MERC was assessed a penalty of $1,000.
Notice of Probable Violation	3/27/2024	420-Field & Records (F&R) Inspection	192.147(a) - Flanges and flange accessories. Each flange or flange accessory (other than cast iron) must meet the minimum requirements of ASME/ANSI B16.5, MSS SP-44, or the equivalent.	During field inspections, a flange in the Lamberton TBS was identified as having inadequate thread engagement on two bolts.	WP 2810.7.0.6. lists criteria for flange stud thread extension. The flange stud identified has been replaced to provide adequate thread engagement at this location.

Type of Correspondence	Date Receieved	Subject	Citation/Code	Description of Violation	Remediation
Notice of Probable Violation	3/27/2024	420-Field & Records (F&R) Inspection	192.605(b) - Procedural manual for operations, maintenance, and emergencies. Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations. (1) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and Subpart M of this part. (2) Controlling corrosion in accordance with the operations and maintenance requirements of Subpart I of this part. (3) Making construction records, maps, and operating history available to appropriate operating personnel. (4) Gathering of data needed for reporting incidents under Part 191 of this chapter in a timely and effective manner. (5) Starting up and shutting down any part of the pipeline in a manner designed to assure operation within the MAOP limits prescribed by this part, plus the build-up allowed for operation of pressure-limiting and control devices. (6) Maintaining compressor stations, including provisions for isolating units or sections of pipe and for purging before returning to service. (7) Starting, operating and shutting down gas compressor units. (8) Periodically reviewing the work done by operator personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance and modifying the procedure when deficiencies are found (9) Taking adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapor or gas, and making available when needed at the excavation, emergency rescue equipment, including a breathing apparatus and, a rescue harness and line. (10) Systematic and routine testing and inspection of pipe-type or bottle-type holders including (i) Provision for detecting external corrosion before the strength of the container has been impaired; (ii) Periodic sampling and testing of gas in storage to determine the dew point of vapors contained in the stored gas which, if condensed, might cause internal corrosion or interfere with the safe operation of the storage plant; and, (iii) Periodic inspection and testing of pressure limiting equipment to determine that it is in safe operating condition and has adequate capacity. (11) Responding promptly to a report of a gas odor inside or near a building, unless the operator's emergency procedures under § 192.615(a)(3) specifically apply to these reports.	DRS #3 in Hayfield, MN had a sensing line with an unlocked valve, there were no physical security barriers in place to prevent this valve from being closed leading to a potential overpressure situation.	OM 37.3.8 lists requirements for station valve security. The unlocked sensing line had been locked immediately upon discovery and the situation was reviewed to ensure that all sensing line valves are locked in the proper position.
Notice of Probable Violation	3/25/2024	Pipeline Failure - Accidentally Caused by Operator	192.751 - Prevention of accidental ignition. Each operator shall take steps to minimize the danger of accidental ignition of gas in any structure or area where the presence of gas constitutes a hazard of fire or explosion, including the following: (a) When a hazardous amount of gas is being vented into open air, each potential source of ignition must be removed from the area and a fire extinguisher must be provided. (b) Gas or electric welding or cutting may not be performed on pipe or on pipe components that contain a combustible mixture of gas and air in the area of work. (c) Post warning signs, where appropriate.	On October 26, 2023 while performing construction activities at 101 E Main St in Kasson, MN, Minnesota Energy Resources failed to take steps to minimize the danger of accidental ignition of gas in an area where the presence of gas constituted a hazard of fire or explosion. This resulted in the emergency response of local firefighting personnel for several hours until the gas could be shut off and fire extinguished.	A review of this incident which included a RCAT of Incident, Lessons Learned, Corrective Action, Remedial Training, and Procedure Review was completed with the construction contractor during their welding qualifications to avoid recurrence. MERC was assessed a $3,000 penalty.
Notice of Probable Violation	4/2/2024	420-Field & Records (F&R) Inspection	192.465(b) - External corrosion control: Monitoring Each cathodic protection rectifier or other impressed current power source must be inspected six times each calendar year, but with intervals not exceeding 2-1/2 months, to ensure adequate amperage and voltage levels needed to provide cathodic protection are maintained.	For calendar years 2020-2023 in NW Region, a total of 6 instances were discovered in which a rectifier inspection was not completed within the required 2.5 interval.	OM Section 41.14 lists to Inspect each cathodic protection rectifier, to ensure proper operation, a minimum of six times each calendar year with intervals not to exceed 2-1/2 months. A compliance task has been added for ensuring rectifier readings are taken within the required timelines.
Notice of Probable Violation	4/19/2024	Pipeline Failure - 3rd Party Damage	Minn. Stat. 216D.04 Sub 3 (a) - Excavation, land survey. Prior to the excavation start time on the notice, an operator shall locate and mark or otherwise provide the approximate horizontal location of the underground facilities of the operator and provide readily available information regarding the operator's abandoned and out-of-service underground facilities as shown on maps, drawings, diagrams, or other records used in the operator's normal course of business, without cost to the excavator. The excavator shall determine the precise location of the underground facility, without damage, before excavating within two feet of the marked location of the underground facility.	On June 22nd, 2023, while conducting excavation activities at Hwy. 40 and 3rd Ave. in Madison under Gopher State One Call excavation notice number 231645795, Contractor contacted and damaged MERC's 2-inch steel stub. The failure to locate and mark the stub resulted in the evacuation of 10 homes, closing of Hwy. 40, and temporarily suspending rail traffic.	There have been recent updates to natural gas facilities in the area between King of Trails and Park Ave on 1st St. and the mapping information has been updated to display the accurate locations of the facilities in this area.
Notice of Probable Violation	5/1/2024	Pipeline Failure - 3rd Party Damage	192.605(b)(3) - Procedural manual for operations, maintenance, and emergencies. (3) Making construction records, maps, and operating history available to appropriate operating personnel.	On 02/26/2024, third-party conducted excavation activities at 3560 213th St. in Farmington under Gopher State One Call excavation notice number 240500029. The most current MERC as-builts dated 1963 which were available to the contract locator, USIC, did not include the MERC 1" HDPE service which was contacted and damaged by third party.	MERC reviewed and verified that all processes were in place for the locate contractor to follow locating best practices and that maps were accurate. The service line for this location has been mapped and verified.
Notice of Probable Violation	5/1/2024	Pipeline Failure - 3rd Party Damage	Minn. Stat. 216D.04 Sub 3 (a) - Excavation, land survey. Prior to the excavation start time on the notice, an operator shall locate and mark or otherwise provide the approximate horizontal location of the underground facilities of the operator and provide readily available information regarding the operator's abandoned and out-of-service underground facilities as shown on maps, drawings, diagrams, or other records used in the operator's normal course of business, without cost to the excavator. The excavator shall determine the precise location of the underground facility, without damage, before excavating within two feet of the marked location of the underground facility.	On 02/26/2024, while conducting excavation activities at 3560 213th St. in Farmington under Gopher State One Call excavation notice number 240500029, third party contacted and damaged a MERC 1" HDPE service. MERC failed to locate and mark or otherwise provide the approximate horizontal location of the underground facilities as required per MS216D.04 Sub 3(a).	MERC reviewed and verified that all processes were in place for the locate contractor to follow locating best practices and that maps were accurate. The service line for this location has been mapped and verified. MERC was assessed a penalty of $1,500.
Notice of Probable Violation	6/5/2024	Pipeline Failure - 3rd Party Damage	192.605(a) - Procedural manual for operations, maintenance, and emergencies. General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.	On 5/8/2024 while excavating via directional bore under Gopher State One Call ticket 241213130, third party damaged a 1/2 inch Aldyl-A service stub. The 10 foot service stub was not marked, nor was it indicated on MERC's GIS mapping database. The damage to the live service stub resulted in an evacuation of 20 people. The absence of facility data is in violation of MERC O&M Manual Section 58, Mapping and As-built Records.	MERC conducted a major project for mapping all service lines within its system. MERC had qualified locate technicians locate all gas mains and verify field findings with GIS data. All corrections were made to mapping. MERC was assessed a penalty of $3,000.
Notice of Probable Violation	8/7/2024	412-Operator Qualification (OQ) Plan Review	192.805(f) - Qualification program Communicate changes that affect covered tasks to individuals performing those covered tasks; and	MERC utilizes an internal document WEC-002 with specific details on how contractor OQ plans are qualified and maintained, as well as communicating changes. OM112 does not contain any procedures specific to this process and does not reference this document. If WEC-002 is used to satisfy code requirements it needs to be referenced in or included in the MERC OQ plan.	MERC updated OM112 on 7/26/2024 to resolve the issue and has added the relevant material from WEC-002 directly into OM 112 new section 112.5.6 (Communication of Changes Affecting Covered Tasks).

Type of Correspondence	Date Receieved	Subject	Citation/Code	Description of Violation	Remediation
Notice of Probable Violation	8/7/2024	412-Operator Qualification (OQ) Plan Review	192.805(f) - Qualification program Communicate changes that affect covered tasks to individuals performing those covered tasks; and	MERC utilizes a number of methods to communicate changes to affected parties such as videos, workshop meetings and EWN evaluations. These methods are satisfactory for the purpose of communicating changes, but OM112 does not specify the use of these methods only containing a general statement that "Significant changes that affect a covered task will be communicated to the individuals who are qualified to perform that covered task."	MERC updated OM112 on 7/26/2024 to resolve the issue and has added the relevant material from WEC-002 directly into OM 112 new section 112.5.6 (Communication of Changes Affecting Covered Tasks).
Notice of Probable Violation	8/28/2024	Pipeline Failure – 3rd Party Damage	192.605(b) - Procedural manual for operations, maintenance, and emergencies. Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.	On June 24th, 2024, during excavation activities near the intersection of County Road 12 and Main Street in Mantorville, Contractor performing work for Minnesota Energy Resources (MERC), contacted and damaged a 2-inch plastic stub coming from a 4-inch plastic gas main. This damage required first responders to shut down Main Street for approximately 5 hours and the loss of 553,410 cubic feet of natural gas.	A full review of O&M Section 58 had been completed and found adequate. This was missed by the construction contractor, having 2 construction crews work this project led to the stub not getting recorded on the as-builts. MERC has also reviewed additional construction project as-builts during this same timeframe, all have shown each fitting and stub on the as-builts drawings. MERC was assessed a penalty of $5,000.
Notice of Probable Violation	9/23/2024	Pipeline Failure – 3rd Party Damage	Minn. Stat. 216D.04 Sub 3 (a) - Excavation, land survey. Prior to the excavation start time on the notice, an operator shall locate and mark or otherwise provide the approximate horizontal location of the underground facilities of the operator and provide readily available information regarding the operator's abandoned and out-of-service underground facilities as shown on maps, drawings, diagrams, or other records used in the operator's normal course of business, without cost to the excavator. The excavator shall determine the precise location of the underground facility, without damage, before excavating within two feet of the marked location of the underground facility.	On September 9, 2024, while conducting excavation activities in the east side right-of-way of I35 E northbound near 37102 Fenway Ave in North Branch, third party contacted and damaged a MERC four-inch diameter 55 psi plastic gas main. Under Gopher State One Call excavation notice number ticket 242263187, this gas main was not located and marked as required per MS216D.04 Sub 3 (a). A marker required by 195.707 was located next to the horizontal directional drill (HDD) rig; however, the marker was deteriorated to the point where the required information was not properly displayed. Failure to maintain the pipeline marker as required may have contributed to this incident.	MERC reviewed this incident with it's locating contractor and a locate ticket audit to ensure quality locates were completed by the locate technician and no other issues were found. Locate ticket audits on the contractor were completed by Minnesota Office of Pipeline Safety and found to be acceptable. MERC was assessed a penalty of $5,000.
Notice of Probable Violation	9/23/2024	Pipeline Failure – 3rd Party Damage	192.707 - Line markers for mains and transmission lines. (a) Buried pipelines. Except as provided in paragraph (b) of this section, a line marker must be placed and maintained as close as practical over each buried main and transmission line: (1) At each crossing of a public road and railroad; and (2) Wherever necessary to identify the location of the transmission line or main to reduce the possibility of damage or interference. (b) Exceptions for buried pipelines. Line markers are not required for the following pipelines: (1) Mains and transmission lines located offshore, or at crossings of or under waterways and other bodies of water. (2) Mains in Class 3 or Class 4 locations where a damage prevention program is in effect under §192.614. (3) Transmission lines in Class 3 or 4 locations until March 20, 1996. (4) Transmission lines in Class 3 or 4 locations where placement of a line marker is impractical. (c) Pipelines above ground. Line markers must be placed and maintained along each section of a main and transmission line that is located above ground in an area accessible to the public. (d) Marker warning. The following must be written legibly on a background of sharply contrasting color on each line marker: (1) The word "Warning," "Caution," or "Danger" followed by the words "Gas (or name of gas transported) Pipeline" all of which, except for markers in heavily developed urban areas, must be in letters at least 1 inch (25 millimeters) high with ¼ inch (6.4 millimeters) stroke. (2) The name of the operator and telephone number (including area code) where the operator can be reached at all times.	On September 9, 2024, while conducting excavation activities in the east side right-of-way of I35 E northbound near 37102 Fenway Ave in North Branch, third party contacted and damaged a MERC four-inch diameter 55 psi plastic gas main. Under Gopher State One Call excavation notice number ticket 242263187, this gas main was not located and marked as required per MS216D.04 Sub 3 (a). A marker required by 195.707 was located next to the horizontal directional drill (HDD) rig; however, the marker was deteriorated to the point where the required information was not properly displayed. Failure to maintain the pipeline marker as required may have contributed to this incident.	OM Section 17.2.1 lists requirements for warning signs. MERC had multiple line markers near the location of the damage. A survey of all line markers in the I35 right of way will be conducted and any deficient markers will be repaired or replaced.
Notice of Probable Violation	9/23/2024	Pipeline Failure – 3rd Party Damage	Minn. Stat. 216D.04 Sub 3 (a) - Excavation, land survey. Prior to the excavation start time on the notice, an operator shall locate and mark or otherwise provide the approximate horizontal location of the underground facilities of the operator and provide readily available information regarding the operator's abandoned and out-of-service underground facilities as shown on maps, drawings, diagrams, or other records used in the operator's normal course of business, without cost to the excavator. The excavator shall determine the precise location of the underground facility, without damage, before excavating within two feet of the marked location of the underground facility.	On July 23, 2024, while conducting excavation activities near 37887 Lincoln Trail Ave in North Branch, third party contacted and damaged a MERC one-inch diameter plastic gas service. Under Gopher State One Call excavation notice number ticket 241940358, this gas service was not located and marked as required per MS216D.04 Sub 3 (a).	MERC reviewed this incident with it's locating contractor and locate ticket audits on the contractor were completed by MNOPS and found to be acceptable. MERC was assessed a penalty of $5,000.
Notice of Probable Violation	12/10/2024	420-Field & Records (F&R) Inspection	192.147(a) - Flanges and flange accessories. Each flange or flange accessory (other than cast iron) must meet the minimum requirements of ASME/ANSI B16.5, MSS SP-44, or the equivalent.	During field inspections three flanges were identified as having bolts with insufficient thread engagement: Lakewood TBS in NW region, and Glenville DRS and Conger TBS in SW region.	WP 2810.7.0.6. lists criteria for flange stud thread extension. All flanges identified with bolts having insufficient thread engagement have been remediated. MERC was assessed a penalty of $1,500.
Notice of Probable Violation	12/10/2024	420-Field & Records (F&R) Inspection	192.161(c) - Supports and anchors. Each support or anchor on an exposed pipeline must be made of durable, noncombustible material and must be designed and installed as follows: (1)Free expansion and contraction of the pipeline between supports or anchors may not be restricted. (2)Provision must be made for the service conditions involved. (3)Movement of the pipeline may not cause disengagement of the support equipment.	During field inspections a total of 37 meter sets were identified as having supports made out of a combustible material such as wood. 36 of these violations were observed at a single trailer park in Albert Lea.	OM 73.10 lists requirements for supports. Remediations continue to be worked with a projected completion date of May 1st.
Notice of Probable Violation	12/10/2024	420-Field & Records (F&R) Inspection	192.199(h) - Requirements for design pressure relief and limiting devices. Except for rupture discs, each pressure relief or pressure limiting device must: Except for a valve that will isolate the system under protection from its source of pressure, be designed to prevent unauthorized operation of any stop valve that will make the pressure relief valve or pressure limiting device inoperative.	During the course of field inspections, it was observed that DRS 1 in Lewiston had an unlocked bypass valve in violation of 192.199(h). Valves which can make pressure relief or pressure regulating devices inoperative must have features in place to prevent unauthorized operation.	MERC objected to this NPV, there had been a locking mechanism in place at this location. MNOPS agreed.
Notice of Probable Violation	12/10/2024	420-Field & Records (F&R) Inspection	192.353(a) - Customer meters and regulators: Location. Each meter and service regulator, whether inside or outside a building, must be installed in a readily accessible location and be protected from corrosion and other damage, including, if installed outside a building, vehicular damage that may be anticipated. However, the upstream regulator in a series may be buried.	During field inspections 13 meter sets were identified as having inaccessible riser valves, due to overgrowth and/or debris buildup. Meter set NGM785586 had been inspected during routine O&M activities following the 2022 comprehensive compliance order and was documented as being in satisfactory condition despite it being inaccessible in violation of 192.353(a).	The meter set riser valves have been remediated. Meter set NGM785586 had been identified as being part of a 2024 replacement project which may have led to not being documented as unsatisfactory during the survey. This meter set has been replaced in the 2024 project. MERC was assessed a penalty of $1,000.

Type of Correspondence	Date Receieved	Subject	Citation/Code	Description of Violation	Remediation
Notice of Probable Violation	12/10/2024	420-Field & Records (F&R) Inspection	192.355(b) - Customer meters and regulators: Protection from damage. Service regulator vents and relief vents. Service regulator vents and relief vents must terminate outdoors, and the outdoor terminal must: (1) Be rain and insect resistant; (2) Be located at a place where gas from the vent can escape freely into the atmosphere and away from any opening into the building; and, (3) Be protected from damage caused by submergence in areas where flooding may occur.	During field inspections a regulator was identified in Freeborn in South West region which was installed sideways, with the regulator vent parallel to the ground in violation of 192.355(b).	OM Section 75.3.2 lists regulator vent requirements. The regulator vent has been remediated on this meter set.
Notice of Probable Violation	12/10/2024	420-Field & Records (F&R) Inspection	192.355(b) - Customer meters and regulators: Protection from damage. Service regulator vents and relief vents. Service regulator vents and relief vents must terminate outdoors, and the outdoor terminal must: (1) Be rain and insect resistant; (2) Be located at a place where gas from the vent can escape freely into the atmosphere and away from any opening into the building; and, (3) Be protected from damage caused by submergence in areas where flooding may occur.	During field inspections a total of 52 meter sets were observed having regulator vents within three feet of a building opening or intake source, in violation of 192.355(b)(2).	All of the identified meter sets have been remediated. This violation is specific to previous TEG Standard 610 requirements. Current TEG Standard 610 requirements allow for clearances to be less than three feet if gas from the vent can escape freely into the atmosphere and away from any opening into the building.
Notice of Probable Violation	12/10/2024	420-Field & Records (F&R) Inspection	192.355(b) - Customer meters and regulators: Protection from damage. Service regulator vents and relief vents. Service regulator vents and relief vents must terminate outdoors, and the outdoor terminal must: (1) Be rain and insect resistant; (2) Be located at a place where gas from the vent can escape freely into the atmosphere and away from any opening into the building; and, (3) Be protected from damage caused by submergence in areas where flooding may occur.	During field inspections two MERC customer meter sets were identified in NE region with missing vent screens on the regulator vent in violation of 192.355(b)(1).	OM Section 75.3.2 lists regulator vent requirements. Both meter set vent screens were added to these meter set regulators.
Notice of Probable Violation	12/10/2024	420-Field & Records (F&R) Inspection	192.479(b) - Atmospheric corrosion control: General. Coating material must be suitable for the prevention of atmospheric corrosion.	During field inspections five MERC above ground assets were observed with coating in unsatisfactory condition for the prevention of atmospheric corrosion as required by 192.479(b). Two assets were customer meter sets with unsatisfactory paint condition in NE region, two more customer meter sets in SW region had unsatisfactory air-ground transition wrap, and TBS1D in Rochester which had exposed FBE. A financial penalty will be levied against MERC for the coating condition of TBS1D.	OM Section 41.3.2 lists these requirements. All assets identified have been remediated. MERC was assessed a penalty of $1,000.
Notice of Probable Violation	12/10/2024	420-Field & Records (F&R) Inspection	192.491(c) - Corrosion control records. Each operator shall maintain a record of each test, survey, or inspection required by this subpart in sufficient detail to demonstrate the adequacy of corrosion control measures or that a corrosive condition does not exist. These records must be retained for at least 5 years with the following exceptions: (1) Operators must retain records related to §§ 192.465(a) and (e) and 192.475(b) for as long as the pipeline remains in service. (2) Operators must retain records of the two most recent atmospheric corrosion inspections for each distribution service line that is being inspected under the interval in § 192.481(a)(2).	In order to demonstrate compliance with atmospheric corrosion inspections required by 192.481, MERC produced records of all above ground assets that were found to be deficient but were unable to provide a comprehensive list of all assets that were inspected for atmospheric corrosion. Due to this record gap, MERC was unable to demonstrate through records that any particular above ground asset had been inspected at the proper intervals and was therefore unable to demonstrate compliance with 192.481.	MERC objected to this NPV and was able to demonstrate compliance. MNOPS agreed.
Notice of Probable Violation	12/10/2024	420-Field & Records (F&R) Inspection	192.605(a) - Procedural manual for operations, maintenance, and emergencies. General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.	During field inspections, observations were made that numerous MERC facilities did not meet TEG Standards. These issues included regulator vents within 3 feet of an ignition source (TEG Standard 610.2.6(3)), meter sets installed under structures (TEG Standard 610.2.4.7(d)), meter sets in contact with ground and or structure (TEG Standard 610.7(a)), meter sets with tilt in excess of 10% (TEG Standard 610.3.3), risers through hard surface with no sleeve (TEG standard 520.3.17), and abandoned risers with no cap (TEG Standard 1050.2.1(2)(b)). Per 192.605(a), Operations and Maintenance procedures must be followed by operators as if they were code. Meter set NGM775812 in Pine City had been inspected during routine O&M activities following the 2022 comprehensive compliance order, and was documented as being in satisfactory condition despite it being in contact with ground and/or structure in violation of TEG Standard 610.7(a).	MERC has remediated all deficiencies on the identified meter sets. For vent near ignition sources, this violation is specific to previous TEG Standard 610 requirements. Current TEG Standard 610 requirements allow for clearances to be less than three feet if gas from the vent can escape freely into the atmosphere and away from any opening into the building. MERC was assessed a penalty of $1,000.
Notice Of Probable Violation	12/18/2024	Pipeline Failure - 3rd Party Damage	192.605(a) - Procedural manual for operations, maintenance, and emergencies. General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.	MERC's contract locator failed to follow procedure while locating GSOC ticket no. 242550764. As a result of this failure, requesting party damaged a 4-inch natural gas main while conducting boring operations on September 16th. The resulting damage required first responders, delay work to requesting party, and loss of natural gas to the atmosphere.	MERC contract locator had been immediately pulled from MERC locating and was given additonal training through contractor locating programs. The contract locator had to be recertified, and previous gas work was audited before allowed to locate MERC facilites again.

In the Matter of the Annual Service Quality Report of Minnesota Energy Resources Corporation for 2024

Docket No. G011/M-25-34

CERTIFICATE OF SERVICE

I, Kristin M. Stastny, hereby certify that on the 1st day of May, 2025 on behalf of Minnesota Energy Resources Corporation (MERC), I electronically filed a true and correct copy of the enclosed 2024 Gas Service Quality Report on www.edockets.state.mn.us. This filing was also served via U.S. mail and electronic service as designated on the attached service list.

Dated this 1st day of May, 2025.

/s/ Kristin M. Stastny
Kristin M. Stastny

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP		50 S 6th St Ste 1500 Minneapolis MN, 55402-1498 United States	Electronic Service		No	M-25-34
2	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-25-34
3	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-25-34
4	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	M-25-34
5	Joylyn C	Hoffman Malueg	joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources		2685 145th St W Rosemount MN, 55068 United States	Electronic Service		No	M-25-34
6	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-34
7	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	M-25-34
8	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-25-34
9	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-34
10	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	M-25-34
11	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203	Electronic Service		No	M-25-34

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						United States				
12	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	M-25-34
13	Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine		225 S 6th St Ste 3500 Capella Tower Minneapolis MN, 55402-4629 United States	Electronic Service		No	M-25-34
14	Tina E	Wuyts	tina.wuyts@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		PO Box 19001 700 N Adams St Green Bay WI, 54307-9001 United States	Electronic Service		No	M-25-34