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May 31, 2019

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

RE: Docket No. G004/M-19-280
Reply Comments to the Comments of the Minnesota Department of Commerce,
Division of Energy Resources Commission review of Great Plains 2018 Gas
Service Quality Annual Report

Dear Mr. Wolf:

Great Plains Natural Gas Co. (Great Plains), a Division of Montana-Dakota Utilities Co., herewith electronically files its Reply Comments to the Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) filed on May 23, 2019.

The Department recommended the Minnesota Public Utilities Commission accept the gas service quality report submitted by Great Plains. However, the Department requested that Great Plains provide an explanation or additional information regarding the low number of 2018 gas line damage incidents and an explanation as to why the reported 2017 and 2018 number of gas line damage incidents and service interruptions reported in Schedules 9 and 10 were reported as being the same in reporting years 2017 and 2018. The reported figures in 2017 and 2018 would indicate that every gas line damage incident caused a service interruption and every service interruption was caused by a gas line damage.

In response to the Department's comments on Page 12 regarding the number of Damaged Gas Lines reported in 2018 in Schedule 9, the decrease in damages from prior years may be attributable to Great Plains' continued focus on working with contractors in order to reduce damages including education on how to best excavate around Great Plains' PVC system.

On Page 13 of the Departments comments, the Department requested that Great Plains confirm the accuracy of the number of Gas Line Damage Incidents on Schedule 9 and Service Interruptions (Schedule 10) reported in 2017 and 2018.

Great Plains has discovered that the number of gas damages reported for 2017 on Schedule 9 and the number of service interruptions reported for 2017 and 2018 on Schedule 10 were incorrect. Included in Attachment A are the Revised 2017 Schedule 9 Gas System Damages and Revised Schedule 10 Gas Service Interruptions. The 2017 Revised Schedule 9 shows that 13 gas system damages occurred under the control of Great Plains and 21 damages caused by others for a total of 34 damages. Revised 2017 Schedule 10 shows the number of service interruptions caused due to employees' contractors under Great Plains control is 12 and the number of outages due to other unplanned causes were 18 for total gas service interruptions of 30. No changes are necessary to the 2018 Gas System Damage Schedule 9; however, the 2018 Schedule 10 has been revised to reflect changes in the number of gas service interruptions due to employees' contractors under Great Plains control and also due to other unplanned outages.

In summary, Great Plains had a total of 34 damages that resulted in 30 service interruptions on its system in 2017. In 2018, Great Plains had 28 damages to the system that resulted in 19 gas service interruptions.

Great Plains agrees with the Departments recommendation to accept Great Plains Gas Service Quality Report for 2018 in Docket No. G004/M-19-280.

If you have any questions regarding this filing, please contact Tamie A. Aberle at (701) 222-7856, or Brian Meloy, at (612) 335-1451.

Sincerely,

/s/ Tamie A. Aberle

Tamie A. Aberle
Director of Regulatory Affairs

ATTACHMENT A

**Great Plains Natural Gas Co.
Gas Service Quality Annual Report
For the Calendar Year Ending December 31, 2017**

Gas System Damage-Revised

	<u>Total</u>	<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>June</u>	<u>July</u>	<u>Aug</u>	<u>Sept</u>	<u>Oct</u>	<u>Nov</u>	<u>Dec</u>
Damage Under the Control of Great Plains' Employees and Contractors	13	0	0	0	0	1	1	0	3	0	4	4	0
Damage - All Other Causes	21	0	0	0	0	1	2	7	2	4	2	2	1
Total Number of Damages	34	0	0	0	0	2	3	7	5	4	6	6	1
Miles of Pipe 1/	522	522	522	522	522	522	522	522	522	522	522	522	522
Damage per 100 Miles of Pipe													
Under the Control of Great Plains' Employees and Contractors	2.49	0.00	0.00	0.00	0.00	0.19	0.19	0.00	0.57	0.00	0.77	0.77	0.00
All Other Causes	4.01	0.00	0.00	0.00	0.00	0.19	0.38	1.34	0.38	0.77	0.38	0.38	0.19
Total	6.50	0.00	0.00	0.00	0.00	0.38	0.57	1.34	0.95	0.77	1.15	1.15	0.19

1/ Total miles of distribution (457.56) and transmission (64.887) main operated in Minnesota.

**Great Plains Natural Gas Co.
Gas Service Quality Annual Report
For the Calendar Year Ending December 31, 2017**

Gas Service Interruptions-Revised

	Total	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec
Due to Employees/Contractors													
Number of Customers	24	0	0	0	0	2	2	0	3	0	13	4	0
Number of Outages	12	0	0	0	0	1	1	0	2	0	4	4	0
Average Duration of Outage (in minutes)	102	0	0	0	0	150	25	0	30	0	138	110	0
Due to Other Unplanned Causes													
Number of Customers	122	0	0	0	0	18	6	32	24	12	14	2	14
Number of Outages	18	0	0	0	0	1	1	6	2	4	2	1	1
Average Duration of Outage (in minutes)	232	0	0	0	0	300	180	255	495	135	135	120	240
Total Interruptions													
Number of Customers	146	0	0	0	0	20	8	32	27	12	27	6	14
Number of Outages	30	0	0	0	0	2	2	6	4	4	6	5	1
Average Duration of Outage (in minutes)	180	0	0	0	0	225	103	255	263	135	137	112	240
Duration in Minutes													
Due to Employees/Contracts	1,225	0	0	0	0	150	25	0	60	0	550	440	0
Due to Others	4,170	0	0	0	0	300	180	1,530	990	540	270	120	240
	5,395	0	0	0	0	450	205	1,530	1,050	540	820	560	240

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Gas Service Quality Annual Report
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Gas Service Interruptions-Revised

	Total	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec
Due to Employees/Contractors													
Number of Customers	29	0	0	0	0	2	15	10	2	0	0	0	0
Number of Outages	8	0	0	0	0	1	2	3	2	0	0	0	0
Average Duration of Outage (in minutes)	148	0	0	0	0	180	270	88	100	0	0	0	0
Due to Other Unplanned Causes													
Number of Customers	223	0	0	1	0	0	1	1	20	1	2	197	0
Number of Outages	11	0	0	1	0	0	1	1	2	1	2	3	0
Average Duration of Outage (in minutes)	179	0	0	180	0	0	120	25	180	140	225	230	0
Total Interruptions													
Number of Customers	252	0	0	1	0	2	16	11	22	1	2	197	0
Number of Outages	19	0	0	1	0	1	3	4	4	1	2	3	0
Average Duration of Outage (in minutes)	166	0	0	180	0	180	220	73	140	140	225	230	0
Duration in Minutes													
Due to Employees/Contracts	1,185	0	0	0	0	180	540	265	200	0	0	0	0
Due to Others	1,965	0	0	180	0	0	120	25	360	140	450	690	0
	3,150	0	0	180	0	180	660	290	560	140	450	690	0