

Staff Briefing Papers

Meeting Date	February 28, 2018	Agenda Item *3	
Company	Great Plains Natural Gas Company (Great Plains)		
Docket No.	G004/M-18-286		
	In the Matter of Great Plains Natural Gas Company's 2017 Annual Gas Service Quality Report		
Issue	1. Should the Commission Accept Great Plains' 2017 Annual Gas Service Quality Report?		
Staff	Marc Fournier	Marc.Fournier@state.mn.us	651-214-8729

 Relevant Documents	Date
Commission Order Accepting Great Plains' 2015/2016 Gas Service Quality Report, Docket No. G004/M-16-357 and G004/M-17-353	August 16, 2017
Great Plains' Initial Filing 2017 Natural Gas Service Quality Performance Report. G004/M-18-286	April 18, 2018
Comments of the Minnesota Department of Commerce Division of Energy Resources	May 18, 2018

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 **Relevant Documents**

Date

Commission Information Requests 1-6

October 11, 2018

Great Plains' Response to Commission Information Requests 1-6

November 9, 2018

I. Statement of the Issues

Should the Commission Accept Great Plains' 2017 Annual Gas Service Quality Report?

II. Background

On April 16, 2009, the Minnesota Public Utilities Commission (Commission) opened an investigation into natural gas service quality standards and requested comments from the Minnesota Department of Commerce, Division of Energy Resources (Department) and all Minnesota regulated natural gas utilities in Docket No. G999/CI-09-409 (09-409 Docket). As a result, the gas utilities file annual reports on various service quality standards.

On April 18, 2018, Great Plains Natural Gas Co. (Great Plains, GP, or the Company) filed its calendar year 2017 Annual Service Quality Report (2017 Report).

On May 18, 2018, the Minnesota Department Commerce submitted its initial comments on Great Plains' 2017 Service Quality Report.

On October 11, 2018, the Commission information requests 1-6 which request information related to additional gas service quality reports and a company's customer service window for customer premise (when the customer's presence is required). Great Plains provided its responses on November 9, 2018.

III. Parties' Comments

DOC: Based on its review of Great Plains' 2017 Annual Service Quality Report, the Department recommends that the Commission accept Great Plains' 2017 Report.

Great Plains: Great Plains respectfully requests this filing be accepted as being in full compliance with the filing requirements of this Commission.

Great Plains' Responses to Information Requests 1-6:

PUC # 1 Please provide an analysis of whether any of the following reports or data would enhance the Commission's evaluation of the company's level of service quality:

- a. The data required under Title 49 Code of Federal Regulations §192.1007 (e):
Performance measures developed from an established baseline to evaluate the effectiveness of a company's Integrity Management (IM) program. These performance measures include the following:

- (i) Number of hazardous leaks either eliminated or repaired as required by § 192.703(c) of this subchapter (or total number of leaks if all leaks are repaired when found), categorized by cause;
 - (ii) Number of excavation damages;
 - (iii) Number of excavation tickets (receipt of information by the underground facility operator from the notification center);
 - (iv) Total number of leaks either eliminated or repaired, categorized by cause;
 - (v) Number of hazardous leaks either eliminated or repaired as required by § 192.703(c) (or total number of leaks if all leaks are repaired when found), categorized by material; and
 - (vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the operator's IM program in controlling each identified threat.
- b. A summary of any 2017 emergency response violations cited by MNOPS along with a description of the violation and remediation in each circumstance; and
- c. The number of violation letters your company has received from MnOPS during the year in question.

Response:

- a. Great Plains believes that current Commission reporting requirements strike the appropriate balance between the need to provide useful and substantive information on gas service quality and the need to ensure that the amount and nature of the information being supplied, reviewed and evaluated annually is reasonable. Nevertheless, Great Plains recognizes that the Commission could reasonably conclude that requiring utilities to provide the information requested in a. (i) – (v) would provide the Commission a view of the Company's Integrity Management programs. With respect to (v) above, Great Plains notes that it reports the hazardous leaks either eliminated or repaired categorized by cause in the 7100 reports, but that information is not categorized by material.
- b. As noted above, Great Plains believes that current Commission reporting requirements strike the appropriate balance between the need to provide useful and substantive information on gas service quality and the need to ensure that the amount and nature of the information being supplied, reviewed and evaluated is reasonable. Nevertheless, Great Plains believes a summary of violations and number of violation letters could enhance the Commission's evaluation of the company's level of service quality. These metrics trended over time could demonstrate a company's operator history and knowledge of their systems.
- c. Please see response b. above.

PUC # 2 Please identify any other PHMSA and MnOPS reporting requirements not presently collected by the Commission that gas utilities might suggest as being useful in order to give the Commission a fuller picture of a gas utility's service quality performance. This may include reporting required by 49 CFR Part 191 such as the Incident Report required by §191.9 and the Annual Report required by §191.11

Response:

As noted in response to Information Request PUC # 1, Great Plains believes that current reporting requirements are sufficient. Great Plains has not identified any additional reporting that merits inclusion in the annual service quality reporting with the Commission.

PUC # 3 Please provide your company's standard customer service window for customer premise visits (when the customer's presence is required).

Response: Great Plains asks the customer to be available between 8:00 a.m. and 5:00 p.m. on the day the order is scheduled. If this is inconvenient for the customer, Great Plains offers a "call-before" option and attempt to reach the customer by telephone to notify them we are on the way approximately 20 minutes prior to arriving. Great Plains does receive customer requests for an a.m. or p.m. visit (four-hour window); however we cannot guarantee that we can meet such a request and advise the customer of this during the recap of the request for service.

PUC # 4 Please provide the rationale for the length of your customer service window for customer premise visits (when the customer's presence is required).

Response:

The reason for the 8-hour window is due to the uncertainty of what the workload will be on a future date as well as the possibility the service technician may be pulled away to respond to a natural gas emergency. Since orders are taken for a future date we are not able to predict the workload for the scheduled date nor where that particular order may fall in the technician's route for that day. The service technician's route would be based on how that order aligns with the location of other orders scheduled for the day. Further, due to the non-contiguous and rural nature of Great Plains' service territory, often times technicians must travel between towns, which could require extensive travel time. If a technician that is planning to meet a customer is called away to an emergency, any appointment times that would have been previously set must be rescheduled.

PUC # 5 If your company's customer service window for customer premise visits (when the customer's presence is required) is greater than four hours, are there other utilities or businesses that give customers a service window greater than four hours?

Response:

Great Plains has not established its practice based on the policies of other utilities or businesses, therefore an analysis is not available.

PUC # 6 If your company has a customer service window for customer premise visits (when the customer's presence is required) greater than four hours, is it possible or practical for the company to narrow the window to two or four hours?

Response:

Great Plains recognizes the inconvenience of the 8-hour appointment window. However, it is not feasible to have tighter appointment windows without drastically adjusting the amount of staff dedicated to responding to calls. The emergency nature of the work and frequency of contractors/homeowners striking company facilities while digging makes it difficult to predict where a service technician may be at a designated time in the day. However, Great Plains service technicians know their community very well and work to accommodate customers whenever possible. Staffing to a level sufficient to meet narrow appointment windows as well as covering emergency calls would result in higher costs and underutilized resources.

IV. Staff Analysis

Staff agrees with the recommendation of the DOC at page 13 of its May 18, 2018 comments and accept Great Plains' 2017 Annual Natural Gas Service Quality Report. However, the Commission may wish to ask further questions of Great Plains regarding the Company's responses to information requests 1-6.

V. Decision Options

1. Accept Great Plains' 2017 Annual Gas Service Quality Report.
2. Do not accept Great Plains' 2017 Annual Gas Service Quality Report.