


## Staff Briefing Papers

Meeting Date	October 24, 2019	Agenda Item *9
Company	Great Plains Natural Gas Co.	
Docket No.	<b>G-004/M-19-280</b> <b>In the Matter of Great Plains Natural Gas Company's Service Quality Report for 2018</b>	
Issues	Should the Commission accept Great Plains Natural Gas Company's Service Quality Report?	
Staff	Kevin O'Grady	651-201-2218

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 <b>Relevant Documents</b>	<b>Date</b>
<i>Order Accepting Report, Requiring Compliance Filing, and Setting Additional Reporting Requirements (Docket 18-286)</i>	April 12, 2019
Great Plains: Service Quality Report for 2018	April 24, 2019
DOC: Comments	May 23, 2019
Great Plains: Reply Comments	May 31, 2019
DOC: Response to Reply Comments	June 7, 2019
OAG: Comments	June 17, 2019

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The attached materials are work papers of the Commission Staff. They are intended for use by the Public Utilities Commission and are based upon information already in the record unless noted otherwise.

## I. Statement of the Issues

Should the Commission accept Great Plains Natural Gas Company's Service Quality Report?

## II. Background

**On April 24, 2019**, Great Plains submitted its 2018 Natural Gas Service Quality Report (*Report*) pursuant to several Commission orders, and including information that is responsive to the most recent Commission order.<sup>1</sup>

**On May 23, 2019**, the Department of Commerce (DOC) filed comments.

**On May 31, 2019**, Great Plains filed comments in reply to DOC.

**On June 7, 2019**, DOC responded to Great Plains' reply comments.

**On June 17, 2019**, the Office of the Attorney General – Residential Utilities and Antitrust Division (OAG) filed comments.

## III. Introduction

The Commission requires five Minnesota natural gas utilities<sup>2</sup> to file annual service quality reports, and Staff has prepared a separate Briefing Paper to address each of the five 2018 submissions, individually. Those Briefing Papers focus on the content of the reports and their sufficiency, going toward the ultimate question as to whether the Commission should accept the reports.

Staff has also prepared a sixth Briefing Paper addressing an issue raised by OAG regarding future reporting. OAG submitted a single set of comments in all five individual dockets, those comments recommending that, in the future, the utilities file substantially more information regarding transmission and distribution system integrity.<sup>3</sup> OAG also recommends that the reporting format be standardized across the utilities. OAG did not make any recommendation as to whether the five individual reports should be accepted or not.

This Briefing Paper focuses on Great Plains' *Report*. Great Plains' *Report* comprises less than ten pages of discussion supported by approximately 90 pages of numerical tables.. In its comments DOC has summarized much of Great Plains' *Report* in a tabular form that includes

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<sup>1</sup> Order in Docket 18-286 (April 12, 2019).

<sup>2</sup> Xcel Energy, CenterPoint Energy, Minnesota Energy Resources Corporation, Greater Minnesota Gas, and Great Plains Natural Gas.

<sup>3</sup> OAG believes CenterPoint Energy's reporting of system integrity information is a good model for the other utilities.

historical information for most metrics. Staff has not duplicated those tables in this Briefing Paper.

Note that the Commission has recently opened an investigation to explore the possibility of improving the reporting of involuntary disconnection data by utilities.<sup>4</sup> The results of that investigation may affect future service quality report filing requirements.

## A. Great Plains' Report

### 1. Quality Metrics

Great Plains reported on a number of quality metrics, most of which it has addressed in previous annual reports:

Quality Metrics	Location of Discussion in Record	
	Great Plains	DOC
<b>Call Center Response Time</b>	p. 1 and Schedule 1	p. 2
<b>Meter Reading Performance</b>	p. 1 and Schedule 2	pp. 2-3
<b>Involuntary Service Disconnections</b>	pp. 1-2 and Schedule 3	pp. 3-4
<b>Service Extension Requests</b>	p. 2 and Schedule 4	pp. 4-5
<b>Customer Deposits</b>	p. 2 and Schedule 5	p. 5
<b>Customer Complaints</b>	p. 3 and Schedule 6	pp. 5-7
<b>Gas Emergency Call Time</b>	p. 5 and Schedule 11	pp. 7-8
<b>Gas Emergency Response Time</b>	p. 4 and Schedule 7	pp. 8-9
<b>Mislocates</b>	p. 4 and Schedule 8	pp. 9-10
<b>Damaged Gas Lines</b>	pp. 4-5 and Schedule 9 (and Reply: pp. 1-3)	pp. 10-12 (and Response: pp. 1-4)
<b>Service Interruptions</b>	p. 5 and Schedule 10 (and Reply: pp. 1-3)	pp. 12-13 (and Response: pp. 1-4)
<b>MNOPS Reportable Events</b>	p. 5	p. 13
<b>Customer-Related O&amp;M Expenses</b>	p. 5 and Schedule 12	pp. 13-14
<b>Additional Requirements: Integrity System Plans</b>	p. 6 and Schedule 13	p. 15
<b>Additional Requirements: MNOPS Violation Remediation</b>	p. 6	p. 16
<b>Additional Requirements: MNOPS Violation Letters</b>	p. 6	p. 16
<b>Additional Requirements: Excess Flow Valves (EFVs)</b>	p. 6 and Schedule 13	p. 16

<sup>4</sup> Docket No. E,G-999/CI-19-563. *In the Matter of a Commission Investigation to Explore Possible Improvements for Reporting Involuntary Customer Service Disconnection Data.*

## 2. Additional Requirements

Great Plains provided information on four additional areas as required by the Commission in its order issued upon review of Great Plains' 2017 service quality report. The Commission stated that Great Plains must file:

- a. the utility's filing under 49 CFR 192.1007 (e): integrity management plan performance measures; monitoring results; and evaluation of effectiveness in a manner to establish a baseline for ongoing reporting.
- b. a summary of any 2018 emergency response violations cited by MNOPS [Minnesota Office of Pipeline Safety] along with a description of the violation and remediation in each circumstance.
- c. the number of violation letters received by the utility from MNOPS during the year in question.
- d. a discussion of how to provide ongoing monitoring and metrics towards the deployment of Excess Flow Valves and manual service line shutoff valves pursuant to the Commission's order in Docket No. G-999/CI-18-41.<sup>5</sup>

With respect to integrity management plan reporting (requirement "a," above), Great Plains provided the information that it had submitted to the US Department of Transportation pursuant to 49 CFR 192.1007(e).<sup>6</sup>

With respect to requirements "b" and "c," above, Great Plains stated that, in 2018, it had not been cited for any emergency response violations by MNOPS and that it had not received any MNOPS violation letters.<sup>7</sup>

With respect to Excess Flow Valves (EFVs – requirement "d," above) Great Plains reported that it had installed an estimated total of 5,000 EFVs by year end. With respect to Shut-Off Valves (SOVs) Great Plains reported that it had installed 19 SOVs by year end.<sup>8</sup>

### B. DOC Comments

DOC recommended that the Commission accept Great Plains' service quality report stating that Great Plains had met all the applicable reporting requirements. However, DOC asked Great Plains for additional information:

[G]iven the atypically low number of damage incidents caused by factors outside of Great Plains' control for 2018, the Department invites Great Plains to provide in its

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<sup>5</sup> Order in Docket 18-286, April 12, 2019.

<sup>6</sup> Great Plains Comments, Schedule 13.

<sup>7</sup> Great Plains Comments, p. 6.

<sup>8</sup> Great Plains Comments, Schedule 13.

Reply Comments an explanation or additional context around the reported number of 2018 gas line damage incidents.

[G]iven the unusually precise alignment of the number of gas line damage incidents and service interruptions reported for 2017 and 2018, the Department asks that Great Plains confirm in its Reply Comments the accuracy of the number of gas line damage incidents and service interruptions for 2017 and 2018.<sup>9</sup>

DOC also recommends that “the Commission continue to require Great Plains to report its distribution system performance measures as outlined in item 3 [“a” through “d” above] and established by the Commission Order for Docket No. G004/M-18-286, issued April 12, 2019.”<sup>10</sup>

### C. OAG Comments

OAG made no recommendation as to whether the Commission should accept the *Report*.

### D. Great Plains Reply to DOC

Great Plains responded to DOC regarding the number of damaged gas lines stating “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.”<sup>11</sup>

With respect to DOC’s concern regarding the accuracy of gas line damage incidents Great Plains acknowledged a reporting error and provided revisions. Great Plains stated that it “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.”<sup>12</sup>

### E. DOC Response

DOC continued to recommend that the Commission accept Great Plains’ *Report*. Given Great Plains’ revisions DOC revised several historical tables reporting gas line damages and service interruptions.<sup>13</sup> With respect to the ongoing reporting of integrity management plans, MNOPS violations, EFVs and SOV’s DOC recommended that the Commission maintain those requirements.

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<sup>9</sup> DOC Comments, p. 16.

<sup>10</sup> DOC Comments, p. 16.

<sup>11</sup> Great Plains Reply Comments, p. 1.

<sup>12</sup> Great Plains Reply Comments, p. 2.

<sup>13</sup> DOC Response, pp. 2-4.

#### IV. Staff Analysis

Staff believes that Great Plains has met the Commission’s reporting requirements and recommends the Commission accept Great Plains’ *Report*. Great Plains addressed the Commission’s four additional reporting requirements (regarding system integrity planning, MNOPS violations, EFVs and SOVs). DOC recommended that the Commission maintain all four requirements established for Great Plains and the other four gas utilities. However, in the other service quality dockets DOC recommended the Commission drop the requirement for EFV reporting in the service quality dockets given that the five utilities are required to submit reports regarding EFVs and SOVs in the EFV Docket (18-41). Note that the Commission was silent as to whether Great Plains must report that information in subsequent years (although it did make reference to “ongoing reporting” and “ongoing monitoring”).<sup>14</sup>

In those other dockets DOC offered the following modifications to the ordering language:<sup>15</sup>

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

The Commission may wish to adopt this language here if it does so in the other service quality report dockets.

#### V. Decision Options

1. Accept Great Plains’ *Report*.
2. Accept Great Plains’ *Report* and modify the future reporting requirements to require Great Plains to file ...
  - a. based on the utility’s filing under 49 CFR 192.1007 (e) and the baseline information provided on May 1, 2019, an update of: integrity management plan performance measures; monitoring results; and evaluation of effectiveness ~~in a manner to establish a baseline for ongoing reporting.~~

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<sup>14</sup> Order in Docket 18-286, April 12, 2019.

<sup>15</sup> Order in Docket 18-286, April 12, 2019.

- b. a summary of any [2019] emergency response violations cited by MNOPS along with a description of the violation and remediation in each circumstance.
  - c. the number of violation letters received by the utility from MNOPS during the year in question.
  - d. ~~a discussion of how to provide ongoing monitoring and metrics towards the deployment of Excess Flow Valves and manual service line shutoff valves pursuant to the Commission's order in Docket No. G-999/CI-18-41.~~
3. Accept Great Plains' *Report* and maintain the reporting requirements established in the 2017 service quality report:
  - a. the utility's filing under 49 CFR 192.1007 (e): integrity management plan performance measures; monitoring results; and evaluation of effectiveness in a manner to establish a baseline for ongoing reporting.
  - b. a summary of any [2019] emergency response violations cited by MNOPS along with a description of the violation and remediation in each circumstance.
  - c. the number of violation letters received by the utility from MNOPS during the year in question.
  - d. a discussion of how to provide ongoing monitoring and metrics towards the deployment of Excess Flow Valves and manual service line shutoff valves pursuant to the Commission's order in Docket No. G-999/CI-18-41.