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April 18, 2018

**VIA ELECTRONIC FILING**

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

Re: **In the Matter of a Commission Investigation into Natural Gas Utilities' Practices,  
Tariffs and Assignment of Cost Responsibility for Installation of Excess Flow Valves  
and Other Similar Gas Safety Equipment**  
Docket No. G999/CI-18-41

Dear Mr. Wolf:

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

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

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

Sincerely,

**GREATER MINNESOTA GAS, INC.**

/s/

Kristine A. Anderson

cc: Service List

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# CERTIFICATE OF SERVICE

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

**Greater Minnesota Gas, Inc.'s Reply Comments**  
Docket No. G999/CI-18-41

filed this 18<sup>th</sup> day of April, 2018.

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

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck, ND 585014092	Electronic Service	No	OFF_SL_18-41_Official
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.	202 S. Main Street Le Sueur, MN 56058	Electronic Service	No	OFF_SL_18-41_Official
Ryan	Barlow	Ryan.Barlow@ag.state.mn.us	Office of the Attorney General-RUD	445 Minnesota Street Bremer Tower, Suite 1400 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_18-41_Official
David	Blomseth	davidb@communitycoops.com	Community Co-ops of Lake Park	PO Box 329 14583 Hwy 10 W Lake Park, MN 56554	Electronic Service	No	OFF_SL_18-41_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-41_Official
Carl	Cronin	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-41_Official
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_18-41_Official
Randy	Dooley	rdooley@dooleypetro.com	Dooley's Natural Gas LLC	PO Box 100 Murdock, MN 56271	Electronic Service	No	OFF_SL_18-41_Official
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400 Plymouth, MN 554475142	Electronic Service	No	OFF_SL_18-41_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_18-41_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mike	Gorham	mike@nwgas.com	Gorham's Inc dba Northwest Gas	1608 NW 4th St Grand Rapids, MN 55744	Electronic Service	No	OFF_SL_18-41_Official
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St Bismarck, ND 58501	Electronic Service	No	OFF_SL_18-41_Official
Jack	Kegel	jkegel@mmua.org	MMUA	3025 Harbor Lane N Suite 400 Plymouth, MN 55447-5142	Electronic Service	No	OFF_SL_18-41_Official
Allen	Krug	allen.krug@xcelenergy.com	Xcel Energy	414 Nicollet Mall-7th fl Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-41_Official
Amber	Lee	ASLee@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	2665 145th St W Rosemount, MN 55068	Electronic Service	No	OFF_SL_18-41_Official
Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-41_Official
Douglas	Lund	doug.lund@ufcmn.com	United Natural Gas, LLC	705 E. 4th Street PO Box 461 Winthrop, MN 55396	Electronic Service	No	OFF_SL_18-41_Official
Brian	Meloy	brian.meloy@stinson.com	Stinson, Leonard, Street LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-41_Official
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.	PO Box 68 202 South Main Street Le Sueur, MN 56058	Electronic Service	No	OFF_SL_18-41_Official
Adam	Pyles	adam.pyles@centerpointenergy.com	CenterPoint Energy	800 LaSalle Avenue PO Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_18-41_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-41_Official
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-41_Official
Kristin	Stastny	kstastny@briggs.com	Briggs and Morgan, P.A.	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-41_Official
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-41_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_18-41_Official
Tim	Thompson	tthompson@lrec.coop	Lake Region Electric Cooperative	PO Box 643 1401 South Broadway Pelican Rapids, MN 56572	Electronic Service	No	OFF_SL_18-41_Official
Teresa	Wenninger	teresa.wenninger@ufcmn.com	United Farmers Cooperative	PO Box 461 Winthrop, MN 55396	Electronic Service	No	OFF_SL_18-41_Official
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_18-41_Official

**STATE OF MINNESOTA**

**BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

Nancy Lange  
Dan Lipschultz  
Matt Schuerger  
Katie Sieben  
John Tuma

Chair  
Commissioner  
Commissioner  
Commissioner  
Commissioner

MPUC Docket No. G999/CI-18-41

**In the Matter of a Commission  
Investigation into Natural Gas  
Utilities' Practices, Tariffs and  
Assignment of Cost Responsibility  
for Installation of Excess Flow Valves  
and Other Similar Gas Safety Equipment**

**GREATER MINNESOTA GAS, INC.'S  
REPLY COMMENTS**

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**OVERVIEW**

The Minnesota Public Utilities Commission (Commission) initiated the instant docket to inquire about and determine the appropriate method to address costs associated with installation of excess flow valves (EFVs) on existing gas service lines for requesting customers. Affected utilities submitted initial filings as required by the Commission's Notice of Comment Period (Notice) issued on February 6, 2018. On April 6, 2018, parties filed Comments in the docket, including the Minnesota Department of Commerce Division of Energy Resources (Department). This submission constitutes Greater Minnesota Gas, Inc.'s (GMG) Reply to those Comments.

**ISSUE SUMMARY**

In its Comments, the Department requested that GMG provide a copy of its customer notification, revised as necessary in conjunction with the Department's Comments, and explain how its notification complies with the regulation requisites. The Department requested further that GMG provide proposed tariff language specific to EFVs. GMG addresses both requests herein.

**DISCUSSION**

GMG appreciates the Department's thorough analysis in this docket and the guidance the Department provided, both in terms of notice language and with regard to tariff language. In accordance with Department's suggestions and requests, GMG provide additional explanation and posed language herein.

**1. GMG Proposes Including Additional Text in its EFV Notification Mailing to Make It More Comprehensive Regarding EFV Suitability and Costs.**

GMG explained in its Initial Filing herein that GMG's customers are notified regarding their right to request installation of EFVs on their existing gas service lines in several ways. A copy of the insert included in each of GMG's last two annual pipeline awareness mailings is provided as Attachment A. GMG believes that it generally complies with the requirements of 49 CFR § 192.383 (e) because it constitutes a written notification to customers of their right to request an EFV, it explains the potential safety benefits that may be derived from installing an EFV and that the device is designed to automatically shut off gas flow in the event of service line breakage, and it describes that there will be a cost for EFV installation. GMG appreciates the Department's guidance regarding notice language; thus, GMG proposes adding additional language to its mailing insert that includes the following:

If you request an EFV, GMG will determine whether the existing service line can be retrofitted to accommodate one, as EFVs are not available for all customers, depending on the amount of natural gas used by the customer, the system pressure inside the line, and some other factors that would impact the EFV's effectiveness. The customer cost for EFV installation is dependent on your particular circumstances and GMG will determine the actual installation cost in a manner consistent with its tariff if you request an EFV. You may be responsible for costs associated with installation, replacing, or maintaining the EFV. If you would like to have an EFV installed, and if your existing service line qualifies for the installation of an EFV, we will work with you to identify the specific cost to you and to determine a mutually agreeable installation date if you choose to proceed with installation.

GMG also intends to incorporate its full EFV notice language on its website once its language is approved.

As noted in its Initial Filing, GMG also includes a message on its monthly bills that alerts customers regarding their right to request EFV installation. The language of that message is as follows:

Excess Flow Valves (EFV): You have the right to request the installation of an EFV (a safety device to reduce the risk of accidents) on service lines that are not being newly installed or replaced. To find out if you already have an EFV or for more information, call us today.

Since the billing notice is not intended to serve as GMG's only written notice of the EFV option, but merely as a supplement to it, GMG has not proposed any changes to that language.

GMG believes that its EFV notice language, with the included text proposed above, fully complies with the federal regulation requirements and meets its obligation with respect to customer notice.

**2. GMG Proposes New Tariff Language Addressing EFV Installation.**

The Department noted that several companies, including GMG, do not currently have tariff language that specifically addresses EFV installation. It recommended that GMG and the other companies propose tariff language consistent with that approved in a related docket. Accordingly, GMG proposes that it incorporate new language related to EFV installation costs into its tariff as an additional section in its General Rules and Regulations. GMG's proposed tariff language is contained in Attachment B, with both redlined and clean copies included.

**CONCLUSION**

GMG appreciates the Department's recommendations and believes that its revisions and proposals included herein appropriately address the EFV requirements. Hence, GMG respectfully requests approval of its proposed language.

Dated: April 18, 2018

Respectfully submitted,

/s/  
Kristine A. Anderson  
Corporate Attorney  
Greater Minnesota Gas, Inc.  
202 S. Main Street  
Le Sueur, MN 56058  
Phone: 888-931-3411

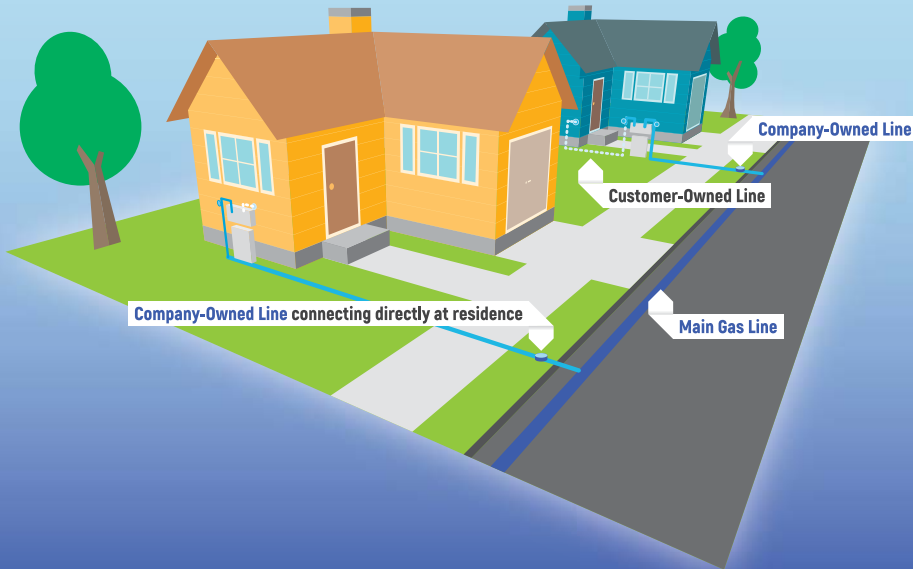


# Excess Flow Valve (EFV) Notification

Federal Regulation (49 CFR - §192.383(d)) regarding gas pipeline safety requires Natural Gas Utilities to notify customers of their right to request installation of an Excess Flow Valve (EFV\*) on their existing gas service line.

## Attachment A

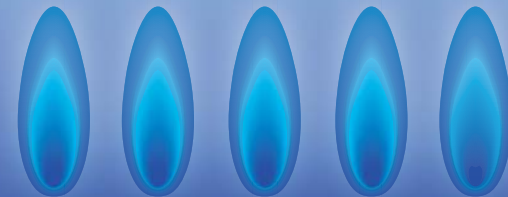
If you would like to have an EFV installed in an existing natural gas service line, such costs, if any, will be the responsibility of the property owner. Please contact your local office for additional information.



## Safety Benefits

An EFV is a safety device that is designed to automatically stop the flow of natural gas should the flow of gas through the device exceed a pre-determined rate. The device is normally installed at (near) the service line's connection to the gas distribution main, and protects against the uncontrolled escape of natural gas should the downstream line be broken/severed. It should be noted that these devices generally do not protect against slow leaks such as those caused by corrosion, loose fittings, or leaks beyond the gas meter (house piping).

The use of EFVs has been primarily precipitated by service line incidents caused by accidental digging by excavators. Such incidents account for about 1/3 of the natural gas pipeline incidents in the United States. While the use of an EFV may help to limit the effects/damages of such an incident, the best prevention against such incidents is to ensure that those who may have reason to be excavating on your property call 811.



## NOTIFICACIÓN SOBRE LA VÁLVULA DE EXCESO DE FLUJO (“EFV” POR SUS SIGLAS EN INGLÉS)

La Regulación Federal (49 CFR - §192.383(d)) respecto a la seguridad en las líneas de tuberías de gas exige que las compañías de Servicios de Utilidades de Gas Natural le notifiquen a los clientes sobre su derecho de solicitar la instalación de una Válvula de Exceso de Flujo (EFV\*) en sus línea de servicio de gas existente.

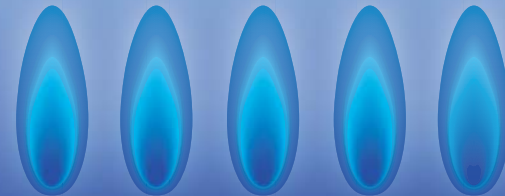
Si desea tener un EFV instalado en una línea de servicio de gas natural existente, dichos costos, en su caso, serán responsabilidad del propietario. Por favor, póngase en contacto con su oficina local para obtener información adicional.



## Ventajas De Seguridad

Un EFV es un dispositivo de seguridad que está diseñado para detener automáticamente el flujo de gas natural en caso de que el flujo de gas a través del dispositivo exceda un índice predeterminado. El dispositivo se instala normalmente en o (cerca) de donde la línea de servicio se conecta a la línea principal de distribución de gas, y protege contra el escape incontrolado de gas natural si la línea posterior se rompe o se corta. Cabe señalar que estos dispositivos generalmente no protegen contra fugas lentas como las causadas por la corrosión, conexiones flojas o fugas más allá del contador de gas (tuberías en la casa).

El uso de los EFV ha sido precipitado principalmente debido a los incidentes en las líneas de servicio causados por la excavación accidental por excavadores. Esos incidentes representan aproximadamente 1/3 de los incidentes en las líneas de tuberías de gas natural en los Estados Unidos. Si bien el uso de un EFV puede ayudar a limitar los efectos/daños de tal incidente, la mejor prevención contra este tipo de incidentes es asegurar que aquellos que tienen motivos para estar excavando en su propiedad llamen al 811.



# Attachment B

Greater Minnesota Gas, Inc.  
Le Sueur, Minnesota 56058  
Gas Rate Book

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General Rules and Regulations (Continued)

Section VI  
2<sup>nd</sup> Revised Sheet No. 4

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## 1.6 Service Calls

When a customer calls and reports a gas problem, such as inadequate gas pressure or a suspected gas leak, the Company will, as soon as reasonably possible, send out a serviceman to determine the necessary action to correct the problem. Priority will be given to emergency requests where there is danger to life and property. The Company's response may be limited to temporary repairs because of the work load or weather conditions.

## 1.7 Excess Flow Valve

An Excess Flow Valve is a safety device designed to automatically stop or restrict the flow of gas if an underground pipe is broken or severed. In accordance with Federal Pipeline Safety Regulations 49 CFR 192.383, the Company will install an excess flow valve on an existing service line at the customer's request at a mutually agreeable date if the service line meets the regulation's designated suitability requirements. At the time of the customer's request, GMG will provide the customer with a detailed explanation of the estimated installation costs identifying specific line items and the per hour rates that the customer would be charged. The actual cost of the installation, excluding the cost of the excess flow valve and any other physical property necessary to install the excess flow valve, will be assessed to the customer.

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Date Filed: May 8, 2012  
By: Greg Palmer  
President

Effective Date: September 26, 2012

Docket No. G022/M-12-468

Order Date: September 26, 2012

**1.6 Service Calls**

When a customer calls and reports a gas problem, such as inadequate gas pressure or a suspected gas leak, the Company will, as soon as reasonably possible, send out a serviceman to determine the necessary action to correct the problem. Priority will be given to emergency requests where there is danger to life and property. The Company's response may be limited to temporary repairs because of the work load or weather conditions.

**1.7 Excess Flow Valve**

An Excess Flow Valve is a safety device designed to automatically stop or restrict the flow of gas if an underground pipe is broken or severed. In accordance with Federal Pipeline Safety Regulations 49 CFR 192.383, the Company will install an excess flow valve on an existing service line at the customer's request at a mutually agreeable date if the service line meets the regulation's designated suitability requirements. At the time of the customer's request, GMG will provide the customer with a detailed explanation of the estimated installation costs identifying specific line items and the per hour rates that the customer would be charged. The actual cost of the installation, excluding the cost of the excess flow valve and any other physical property necessary to install the excess flow valve, will be assessed to the customer.

(Continued on Sheet No. VI-5)