


Staff Briefing Papers

Meeting Date	February 28, 2018	Agenda Item *3
Company	Greater Minnesota Gas, Inc. (Greater Minnesota or GMG)	
Docket No.	G022/M-18-314	
	In the Matter of Greater Minnesota Gas, Inc.'s 2017 Annual Gas Service Quality Report	
Issue	1. Should the Commission Accept GMG's 2017 Annual Gas Service Quality Report?	
Staff	Marc Fournier	Marc.Fournier@state.mn.us 651-214-8729

 Relevant Documents	Date
Commission Order Accepting GMG's 2015/2016 Gas Service Quality Report, Docket No. G022/M-16-383 and G022/M-17-336	April 17, 2018
GMG's Initial Filing 2017 Natural Gas Service Quality Performance Report. G022/M-18-286	May 1, 2018
Comments of the Minnesota Department of Commerce Division of Energy Resources	July 31, 2018

These 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.

To request this document in another format such as large print or audio, call 651.296.0406 (voice). Persons with a hearing or speech impairment may call using their preferred Telecommunications Relay Service or email consumer.puc@state.mn.us for assistance.

 **Relevant Documents**

Date

Commission Information Requests 1-6

October 11, 2018

GMG Response to Commission Information Requests 1-6

October 19, 2018

Minnesota Department of Commerce Letter and Recommendation

February 15, 2019

I. Statement of the Issues

Should the Commission Accept GMG's 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 May 1, 2018, Great Plains Natural Gas Co. (Great Plains, GP, or the Company) filed its calendar year 2017 Annual Service Quality Report (2017 Report).

On July 31, 2018, the Minnesota Department Commerce submitted its initial comments on GMG's 2017 Service Quality Report.

On October 11, 2018, the Commission issued 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). GMG provided its responses on October 19, 2018.

On February 15, 2019, the Minnesota Department of Commerce filed a letter indicating that GMG filed the information the DOC requested in initial comments. As a result, the DOC recommended that the Commission accept GMG's 2017 Gas Service Quality Report.

III. Parties' Comments

DOC: Based on the Department's analysis of the 2017 Report and the Company's Reply Comments, the Department recommends that the Commission accept Greater Minnesota's 2017 Report.

GMG: GMG submits this Annual Service Quality Report for the year ending December 31, 2017 in accordance with the requirements of the Minnesota Rules and the Commission and respectfully requests that it be approved.

GMG 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:

To the extent that the Commission asks for this or other information, GMG will make every effort to be as transparent and responsive as it can be. Nonetheless, as the Commission has indicated in other dockets, collecting information just for the sake of having it is not an effective use of resources, either for Commission and Department staff or for the utilities. Given that the information identified above is already provided to PHMSA and is reviewed annually by MNOPS, any deficiencies are addressed by experts in that area. To the extent that the Commission was also reviewing information and providing regulatory guidance, it would create a very real possibility of divergent and/or conflicting orders and confusion with regard to compliance requirements. GMG believes that the Commission would be better served by communicating directly with MNOPS if it seeks information with regard to those issues. GMG also believes that each governing body will be best served, as will the public and the utilities, by reviewing and regulating within the scope of each body's area of expertise and avoiding overlap to the extent possible. In this specific instance, that would result in the Commission focusing on customer service by the utilities and PHMSA and MNOPS focusing on safety, emergency response, and similar service by the utilities.

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:

GMG respectfully refers to and incorporates by reference its response to PUC Information Request #1, above.

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

Response:

GMG generally tries to schedule a specific appointment time with a customer where the customer's presence is required at the premises. The primary exception to that scenario is when a customer needs a reconnect visit, in which case a four hour window is provided. GMG offers the opportunity to the customer to receive a call ahead during that window, thus allowing a customer to have maximum flexibility for use of the customer's time during the four hour window. If the customer requests a shorter window, GMG makes every effort to accommodate that request.

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:

In the event of planned visits that require a customer's presence at the premises, GMG believes that scheduled appointments best serve its goal of providing exceptional customer service. In reconnection situations that generally arise on the same day as the need for a technician to meet a customer at the premises, GMG believes that a four hour window strikes the appropriate balance between meeting the customer's need for convenience and the Company's ability to accommodate an existing schedule and staffing for emergent situations that could arise, particularly in light of GMG's efforts to make the visit as convenient as possible under the circumstances with a call ahead or shortened window, as necessary

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:

This question does not apply to GMG, as the customer service window does not exceed four hours.

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:

This question does not apply to GMG, as the customer service window does not exceed four hours.

IV. Staff Analysis

Staff agrees with the recommendation of the DOC at page 3 of its February 15, 2019 letter and Recommendation and accept GMG's 2017 Annual Natural Gas Service Quality Report. However, the Commission may wish to ask further questions of GMG regarding the Company's responses to information requests 1-6.

V. Decision Options

1. Accept GMG's 2017 Annual Gas Service Quality Report.
2. Do not accept GMG's 2017 Annual Gas Service Quality Report.