

September 28, 2023

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G004/M-23-78

Dear Mr. Seuffert:

Attached are the *Comments* of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

2022 Annual Gas Service Quality Report (Report) submitted by Great Plains Natural Gas Co. (Great Plains or the Company).

Travis R. Jacobson, Director of Regulatory Affairs with Great Plains Natural Gas Company filed the report on May 1, 2023.

The Department recommends the Minnesota Public Utilities Commission (Commission) **accept Great Plains' report**. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ Felicia Cullen
Public Utilities Financial Analyst

FC/ar
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. G004/M-23-78

I. INTRODUCTION

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 Resources¹ (Department) and all Minnesota regulated natural gas utilities in Docket No. G999/CI-09-409 (09-409 Docket). As a result, Minnesota gas utilities are required to file annual reports with information pertaining to service quality standards; these reports provide the Commission with an opportunity to review the utility's service quality metrics and determine whether the utility is meeting the relevant service quality standards. Great Plains Natural Gas Company (Great Plains or the Company) filed its 2022 annual service quality report (Report) on May 1, 2023.

II. DEPARTMENT ANALYSIS

Each year, the Department analyzes the annual report information by comparing the current service quality data to that provided in prior years. The Department looks for trends and changes in the Company's service quality metrics to determine whether further information is needed and to summarize the data provided over time by the Company. In addition, the Department reviews the annual report to determine whether it complies with applicable statutes, rules, and Commission Orders. Based on its review, the Department makes a recommendation to the Commission to either accept or reject the annual report.

The Department did not identify areas of significant concern regarding Great Plains' 2022 Report. The Department's analysis provides further detail and discussion on each service quality reporting requirement in the following sections.

A. *CALL CENTER RESPONSE TIME*

Minnesota Rules 7826.1200, Subpart 1 stipulates electric utilities must answer at least 80% of calls made to the utility's business office during regular business hours within 20 seconds. Consistent with this Rule and the corresponding reporting requirements under Minnesota Rules 7826.1700, the Commission has required regulated gas utilities to provide in their annual service quality reports the percentage of business office calls answered within 20 seconds. Table 1 provides details on Great Plains' call center response times between 2012 and 2022.

¹ At the time the Commission opened this investigation, the Department was referred to as the Minnesota Office of Energy Security, or OES.

Table 1: Call Center Response Times for Great Plains²

| <i>Calendar Year</i> | <i>Average Percentage (%) of Calls Answered in 20 Seconds or Less</i> | <i>Average Number of Seconds Before Calls were Answered</i> | <i>Total Number of Calls Answered</i> |
|----------------------|---|---|---------------------------------------|
| 2012 | 89 | 13 | 24,571 |
| 2013 | 85 | 21 | 25,854 |
| 2014 | 88 | 18 | 30,466 |
| 2015 | 83 | 12 | 25,810 |
| 2016 | 83 | 12 | 21,924 |
| 2017 | 85 | 19 | 27,614 |
| 2018 | 86 | 13 | 22,979 |
| 2019 | 82 | 3 | 23,805 |
| 2020 | 84 | 4 | 21,281 |
| 2021 | 97 | 6 | 23,349 |
| 2022 | 97 | 10 | 43,978 |

Great Plains' annual reporting as shown in Table 1 above shows on average, its call center consistently answers greater than 80% of calls in 20 seconds or less. Except for 2013, the reported data reflects an average call answering speed of greater than 20 seconds. The Department notes the call volume for 2022 is much higher than any other year. The Company explained this is due to an expansion in its Interactive Voice Response call tracking capability. Previous years' numbers only reflect calls for specific accounts whereas the new capability tracks all calls. For 2022, the Department concludes the Company met both the call center service quality standard and the reporting requirements for the associated data.

B. METER READING PERFORMANCE

In its 09-409 *Order*, the Commission required Great Plains to report meter reading performance data in the same manner as prescribed for electric utilities in Minnesota Rules 7826.1400.³ Table 2 below documents Great Plains' meter reading performance data for years 2012 through 2022.

² Petition, page 1 and Schedule 1.

³ Minnesota Rules 7826.1400 requires the annual service quality report include data on (1) the number and percentage of customer meters read by (a) the utility and (b) the customer, (2) the number and percentage of meters that have not been read by the utility for 6 – 12 months and periods longer than 12 months, and (3) the utility's monthly meter-reading staffing levels.

Table 2: Meter Reading Performance for Great Plains⁴

| <i>CalendarYear</i> | <i>Percentage (%) of Meters Read by Great Plains</i> | <i>Percentage (%) of Meters Read by Customers</i> | <i>Average Number of Meter ReadingPersonnel</i> |
|---------------------|--|---|---|
| 2012 | 99.86 | 0.09 | 8 |
| 2013 | 99.91 | 0.09 | 10 |
| 2014 | 99.91 | 0.09 | 10 |
| 2015 | 99.86 | 0.07 | 6 |
| 2016 | 99.97 | 0 | 3 |
| 2017 | 99.98 | 0 | 3 |
| 2018 | 99.98 | 0 | 3 |
| 2019 | 99.98 | 0 | 3 |
| 2020 | 99.99 | 0 | 3 |
| 2021 | 99.99 | 0 | 3 |
| 2022 | 99.98 | 0 | 3 |

Table 2 shows Great Plains has consistently read over 99% of meters and customers have taken zero or less than 0.1% of meter readings. Since implementing an automated meter reading system in May of 2015, the Company conducts all meter readings by the automated system or utility personnel. In 2022, the automated meter reading system estimated 0.02% of meter readings, and the Company took precise readings for 99.98% of active meters. For all years from 2012 through 2022, Great Plains reported zero meters left unread for a period of six or more months. For 2022, the Department concludes the Company met the meter reading performance reporting requirements.

C. INVOLUNTARY SERVICE DISCONNECTION

The Commission's 09-409 *Order* required Great Plains to provide involuntary service disconnection information as outlined in Minnesota Statutes §§ 216B.091 and 216B.096, which relate to the Cold Weather Rule (CWR). Table 3 provides a summary of the Company's involuntary service disconnection data.

⁴ Petition, pages 1-2.

Table 3: Involuntary Service Disconnections for Great Plains⁵

| <i>Calendar Year</i> | <i>Number of Disconnection Notices Mailed to Customers</i> | <i>Number of Cold Weather Rule Requests</i> | <i>Number of Involuntary Disconnections</i> |
|----------------------|--|---|---|
| 2012 | 13,726 | 22 | 1,093 |
| 2013 | 18,868 | 29 | 1,160 |
| 2014 | 18,711 | 10 | 1,227 |
| 2015 | 8,432 | 18 | 819 |
| 2016 | 9,732 | 12 | 649 |
| 2017 | 9,375 | 16 | 743 |
| 2018 | 9,491 | 18 | 836 |
| 2019 | 9,337 | 43 | 862 |
| 2020 | 1,755 | 0 | 0 |
| 2021 | 2,831 | 14 | 407 |
| 2022 | 4,571 | 21 | 581 |

Due to COVID-19 pandemic, no residential customers were disconnected from services for non-payment in 2020.⁶ Beginning June 1, 2021, the Company resumed sending disconnection notices and resumed disconnections beginning August 2, 2021, in response to the Commission's May 26, 2021 *Order* in Docket No. E,G-999/CI-20-375.

For all years documented in Table 3, the Company granted 100% of the CWR requests received. From 2012 to 2022, the Company reported 8,377 involuntary disconnections, and, of that total, 3,633 occurred in the months of May and June, coinciding with the termination of the CWR in April. The Department notes the Company had 581 residential disconnections in 2022, which is higher than 2021 but still lower than Pre-Covid numbers. The Department concludes the Company met the involuntary service disconnection reporting requirements for 2022.

D. SERVICE EXTENSION REQUESTS

In its 09-409 *Order*, the Commission required Great Plains to provide in its annual report the service extension request information described in items A and B of Minnesota Rules 7826.1600,⁷ with the exception of information already provided as outlined in Minnesota Statutes §§ 216B.091 and 216B.096, Subdivision 11. The Report presents two sets of data, including service requested and subsequently extended to (1) locations *not* previously connected to the utility's system and (2) locations previously connected to the system. Tables 4 and 4(a) show the service extension request data the Company submitted.

⁵ Petition, page 2 and Schedule 3.

⁶ In late March 2020, Great Plains extended the protections of Minnesota's Cold Weather Rule in response to Minnesota Governor Tim Walz's Emergency Executive Order 20-01 issue on March 13, 2020, by restricting disconnection of residential customers for non-payment of utility bills and reconnecting customers who have been disconnected.

⁷ Minnesota Rules 7826.1600 requires that the annual service quality report include information on the utility's service extension request response times for each customer class and month; the utility is required to separately identify customer request data for locations not previously served *and* locations previously served.

Table 4: Service Extension Requests for New Service Locations for Great Plains⁸

| <i>Calendar Year</i> | Residential Customers | | Commercial Customers | |
|----------------------|--|--|--|--|
| | <i>Number of Service Installations</i> | <i>Average⁹ Number of Days to Complete Installation</i> | <i>Number of Service Installations</i> | <i>Average Number of Days to Complete Installation</i> |
| 2012 | 121 | 25 | 45 | 24 |
| 2013 | 132 | 19 | 31 | 18 |
| 2014 | 146 | 23 | 39 | 60 |
| 2015 | 105 | 35 | 33 | 19 |
| 2016 | 122 | 25 | 30 | 19 |
| 2017 | 104 | 27 | 17 | 33 |
| 2018 | 129 | 26 | 24 | 15 |
| 2019 | 151 | 40 | 20 | 21 |
| 2020 | 108 | 45 | 24 | 55 |
| 2021 | 89 | 46 | 22 | 46 |
| 2022 | 77 | 51 | 24 | 44 |

Table 4(a): Service Extension Requests for Previously Served Locations for Great Plains¹⁰

| <i>Calendar Year</i> | Residential Customers | | Commercial Customers | |
|----------------------|--|--|--|--|
| | <i>Number of Service Installations</i> | <i>Average Number of Days to Complete Installation</i> | <i>Number of Service Installations</i> | <i>Average Number of Days to Complete Installation</i> |
| 2012 | 1,047 | 1 | 679 | 1 |
| 2013 | 1,548 | 1 | 271 | 1 |
| 2014 | 1,569 | 1 | 272 | 1 |
| 2015 | 1,138 | 1 | 169 | 1 |
| 2016 | 1,051 | 1 | 211 | 1 |
| 2017 | 868 | 1 | 157 | 1 |
| 2018 | 778 | 1 | 146 | 1 |
| 2019 | 845 | 1 | 120 | 1 |
| 2020 | 524 | 1 | 102 | 1 |
| 2021 | 714 | 1 | 117 | 1 |
| 2022 | 709 | 1 | 138 | 1 |

⁸ Petition, Schedule 4.

⁹ For both residential and commercial customers, the Department calculated the average number of days to complete installation for a given year as (Sum of the monthly averages of days to complete service installation/Number of months in which the Company actually performed service installations). This calculation is neither the weighted average the Department used in its Comments prior to 2019 nor the average Great Plains used in the Company's Report. The Department believes its average calculation used in Tables 4 and 4(a) provides a representative average figure.

¹⁰ Petition, Schedule 5.

Tables 4 and 4(a) show the number of service extension requests for both newly and previously served locations fluctuates over time. The average number of days to complete service installations also varies year to year for newly served locations but has remained steady for previously served locations.

The Department concludes the Company met the service extension request reporting requirements in 2022.

E. CUSTOMER DEPOSITS

In alignment with Minnesota Rules 7826.1900, which is applicable to regulated electric utilities, the Commission requires each natural gas utility to provide data on the number of customers required to make a deposit as a condition of receiving service. Great Plains reports it did not require any customer deposits as a condition of receiving new service in 2022. This is consistent with prior years, where Great Plains reported no collection of customer deposits as a condition of receiving new service during the period of 2012 - 2022. The Department concludes the Company met the customer deposit reporting requirements for 2022.

F. CUSTOMER COMPLAINTS

The Commission's 09-409 *Order* required Great Plains to provide the total number of complaints received and resolved for each complaint category. This requirement corresponds to Minnesota Rules 7826.2000 for electric utilities. Prior to 2013, Great Plains exclusively submitted data on calls escalated to a supervisor for resolution or forwarded to the Company by the Commission's Consumer Affairs Office (CAO). In subsequent years, the Company provided more comprehensive data on customer complaints in its annual service quality reports. Table 5 summarizes select customer complaint data Great Plains submitted and demonstrates most customer complaints have been resolved upon initial inquiry from 2012 through 2022.

Table 5: Escalated Customer Complaints for Great Plains¹¹

| <i>Calendar Year</i> | <i>Number of Complaints Escalated to a Supervisor</i> | <i>Number of Complaints Forwarded from the Consumer Affairs Office</i> | <i>Percentage (%) of Complaints Resolved Upon Initial Inquiry</i> |
|----------------------|---|--|---|
| 2012 | 16 | 0 | 100 |
| 2013 | 28 | 1 | 96 |
| 2014 | 21 | 2 | 86 |
| 2015 | 28 | 0 | 96 |
| 2016 | 10 | 0 | 100 |
| 2017 | 16 | 0 | 75 |
| 2018 | 22 | 1 | 91 |
| 2019 | 28 | 1 | 89 |
| 2020 | 8 | 0 | 100 |
| 2021 | 9 | 3 | 100 |
| 2022 | 4 | 4 | 100 |

¹¹ Petition, Schedule 6.

Table 5(a) provides details on the Company's resolution of customer complaints. The data show Great Plains resolves complaints most often through compromising with the customer or demonstrating the circumstances giving rise to the complaint were beyond the Company's control.

Table 5(a): Escalated Customer Complaints by Resolution Method for Great Plains¹²

| <i>Calendar Year</i> | Percentage (%) of Customer Complaints Resolved by: | | | | |
|----------------------|---|----------------------------------|---|--------------------------------|-----------------------------------|
| | <i>Agreement with Customer</i> | <i>Compromised with Customer</i> | <i>Demonstrate Circumstances are out of Company Control</i> | <i>Refuse Customer Request</i> | <i>Resolution Not Categorized</i> |
| 2012 ¹³ | 13 | 50 | 0 | 19 | 19 |
| 2013 | 0 | 39 | 29 | 32 | 0 |
| 2014 | 0 | 14 | 67 | 19 | 0 |
| 2015 | 4 | 18 | 64 | 14 | 0 |
| 2016 | 0 | 50 | 20 | 30 | 0 |
| 2017 | 0 | 6 | 63 | 31 | 0 |
| 2018 | 0 | 27 | 32 | 41 | 0 |
| 2019 | 4 | 4 | 61 | 32 | 0 |
| 2020 | 0 | 0 | 63 | 37 | 0 |
| 2021 | 1 | 0 | 11 | 0 | 0 |
| 2022 | 2 | 0 | 4 | 2 | 0 |

Beginning in 2014, Great Plains agreed to include data for *all* calls (in addition to calls escalated to a supervisor) received by its customer service center. Table 5(b) provides statistics on the Company's resolution methods across all customer calls involving a concern or complaint.

¹² Petition, Schedule 6.

¹³ The Department notes the 2012 percentages in Table 5(a) correctly reflect the percentages documented by Great Plains in its service quality report, filed May 1, 2013, under Docket No. G004/M-13-366. However, these percentages add up to 101%, rather than 100%. The Department concludes this discrepancy is due to rounding differences, and the figures for 2012 do not contain any material inaccuracies.

**Table 5(b): All Customer Complaints or Concerns by Resolution Method
for Great Plains¹⁴**

| <i>Calendar Year</i> | <i>Total Number of Customer Complaints or Concerns</i> | Percentage (%) of Customer Complaints or Concerns Resolved by: | | | |
|----------------------|--|---|---------------------------------|--|--------------------------------|
| | | <i>Agreement with Customer</i> | <i>Compromise with Customer</i> | <i>Demonstrate that Circumstances are out of Company Control</i> | <i>Refuse Customer Request</i> |
| 2014 | 2,309 ¹⁵ | 33 | 10 | 52 | 5 |
| 2015 | 10,945 | 24 | 13 | 61 | 2 |
| 2016 | 10,056 | 25 | 7 | 66 | 2 |
| 2017 | 8,970 | 21 | 5 | 71 | 3 |
| 2018 | 12,252 | 21 | 24 | 49 | 6 |
| 2019 | 13,060 | 28 | 16 | 52 | 4 |
| 2020 | 10,291 | 33 | 7 | 53 | 7 |
| 2021 | 7,165 | 30 | 10 | 52 | 8 |
| 2022 | 5,284 | 35 | 10 | 50 | 5 |

The Department concludes the Company has met the customer complaint reporting requirements for 2022.

G. GAS EMERGENCY TELEPHONE CALLS

In its 09-409 *Order*, the Commission required Great Plains to provide information about (1) the Company's emergency telephone line response time, (2) procedures the Company currently follows to handle emergency calls, and (3) the Company's internal performance goal for answering emergency calls.

In February of 2011, Great Plains began tracking its percentage of gas emergency phone calls answered within 20 seconds. Table 6 shows the details relevant to emergency phone calls received by Great Plains.

¹⁴ Petition, Schedule 6.

¹⁵ Great Plains noted that this number does not reflect all calls by type and resolution for 2014 but was provided to demonstrate the Company's continued effort towards meeting the reporting requirement for all customer complaint calls. See Docket No. G004/M-15-390 at page 3.

Table 6: Gas Emergency Phone Calls Received by Great Plains¹⁶

| <i>Calendar Year</i> | <i>Number of Gas Emergency Calls</i> | <i>Average Number of Seconds Before Calls were Answered</i> | <i>Percentage (%) of Calls Answered in 20 Seconds or Less</i> |
|----------------------|--------------------------------------|---|---|
| 2012 | 1,437 | 13 | 84 |
| 2013 | 1,421 | 16 | 83 |
| 2014 | 1,702 | 19 | 79 |
| 2015 | 1,397 | 15 | 81 |
| 2016 | 1,007 | 12 | 82 |
| 2017 | 898 | 16 | 86 |
| 2018 | 612 | 10 | 89 |
| 2019 | 808 | 11 | 82 |
| 2020 | 458 | 20 ¹⁷ | 81 |
| 2021 | 506 | 6 | 85 |
| 2022 | 616 | 7 | 84 |

With the exception of year 2014, Great Plains consistently answered greater than 80 percent of calls in 20 seconds or less. The number of emergency phone calls made to the Company has been generally trending downwards from 2014 to 2021. In 2022, the number of gas emergency calls was up slightly over 2021, but was still lower than most previous years.

The Department concludes the Company has met the gas emergency phone call reporting requirements for 2022.

H. GAS EMERGENCY RESPONSE TIME

In compliance with Commission *Order* 09-409, Great Plains reports information on its response time to gas emergencies. The key metric is the time elapsed between when Great Plains is first notified of the emergency and the time emergency response personnel arrive at the incident location to begin making the area safe. The relevant data are documented in Table 7.

¹⁶ Petition, Schedule 11.

¹⁷ In reviewing the data for Department Information Request No. 4, Great Plains found an error in the calculation of the Average Speed of Answer included on page 5 and Schedule 11 of the Company's April 30th report. After correcting the error, the average speed of answer increased from 11 seconds in 2019 to 20 seconds in 2020. See revised Schedule 11 as Attachment A in Great Plains' response to Department Information Request No. 4.

Table 7: Gas Emergency Response Time for Great Plains¹⁸

| <i>Calendar Year</i> | <i>Number of Emergency Calls Requiring Response</i> | <i>Percentage (%) of Calls Responded to in Less than One Hour</i> | <i>Percentage (%) of Calls Responded to in Greater than One Hour</i> | <i>Average Response Time in Minutes</i> |
|----------------------|---|--|---|---|
| 2012 | 367 | >99 | <1 | 14 |
| 2013 | 289 | 97 | 3 | 17 |
| 2014 | 159 | 94 | 6 | 20 |
| 2015 | 174 | 99 | 1 | 15 |
| 2016 | 95 | 95 | 5 | 23 |
| 2017 | 376 | 98 | 2 | 22 |
| 2018 | 456 | 97 | 3 | 22 |
| 2019 | 538 | 98 | 2 | 20 |
| 2020 | 378 | 98 | 2 | 20 |
| 2021 | 441 | 98 | 2 | 19 |
| 2022 | 480 | 97 | 3 | 24 |

Table 7 shows Great Plains has consistently responded to gas emergency calls in less than one hour, with the average response time reported in 2022 at 24 minutes. In the Petition, the Company reported 15 calls where the response time exceeded one hour. However, while responding to a Department Information Request (IR), Great Plains identified two instances where the response time was less than reflected in the report, with one of those instances being under one hour. Therefore, the actual number of calls with a response time more than one hour is 14.¹⁹ The Company explained one of those delayed calls was due to travel distance, 12 were after-hours calls and one was due to staff prioritization of a more serious call.²⁰ The Company responded to 97% of the 2022 calls within one hour. The Department concludes the Company met the gas emergency response time reporting requirements for 2022.

I. MISLOCATES

The Commission's 09-409 *Order* requires Great Plains to provide data on mislocates. Accordingly, the Company incorporates in its annual service quality reports (1) the number of locate tickets and (2) the number of mislocates that resulted in damage to a gas line, including damage that resulted from a mismarked line or the failure to mark a line. Table 8 summarizes the information relevant to the Company's mislocates.

¹⁸ Petition, page 4 and Schedule 7.

¹⁹ Department Attachment 1.

²⁰ Petition, page 4.

Table 8: Mislocates for Great Plains²¹

| <i>Calendar Year</i> | <i>Number of Locate Tickets</i> | <i>Number of Mislocates</i> | <i>Percentage (%) of Mislocates Relative to Locate Tickets²²</i> | <i>Mislocates per 1,000 Locate Tickets</i> |
|----------------------|---------------------------------|-----------------------------|---|--|
| 2012 | 7,490 | 1 | 0.01 | 0.13 |
| 2013 | 6,867 | 14 | 0.20 | 2.04 |
| 2014 | 7,397 | 8 | 0.11 | 1.08 |
| 2015 | 8,287 | 14 | 0.17 | 1.69 |
| 2016 | 8,373 | 11 | 0.13 | 1.31 |
| 2017 | 7,626 | 8 | 0.10 | 1.05 |
| 2018 | 7,893 | 12 | 0.15 | 1.52 |
| 2019 | 7,794 | 7 | 0.09 | 0.90 |
| 2020 | 9,148 | 4 | 0.04 | 0.44 |
| 2021 | 8,928 | 11 | 0.12 | 1.23 |
| 2022 | 7,562 | 12 | 0.16 | 1.59 |

Table 8 shows the Company's mislocates are consistently less than 1% relative to the total number of locate tickets for all years from 2012 through 2022. The number of mislocates increased in 2022 compared to 2020, but is still within the normal range. The Department concludes the Company met the mislocate reporting requirements for 2022.

J. DAMAGED GAS LINES

The Commission's 09-409 *Order* required Great Plains to provide summary data on gas line damage, including the number of damage incidents caused by (1) the utility's employees or contractors and (2) other factors beyond the utility's control. Table 9 outlines the Company's gas line damage information.

²¹ Petition, Schedule 8.

²² The Department calculates the percentage of mislocates as: (total number of mislocates/total number of locate tickets).

Table 9: Damaged Gas Lines for Great Plains²³

| <i>Calendar Year</i> | Number of Gas Lines Damaged: | | | <i>Miles of Gas Line Operated in Minnesota</i> | <i>Damage Incidents per 100 Miles of Gas Line</i> |
|----------------------|-------------------------------------|---|----------------------|--|---|
| | <i>Caused by Great Plains (A)</i> | <i>Caused by Factors Outside of Great Plains' Control (B)</i> | <i>Total (A + B)</i> | | |
| 2012 | 14 | 54 | 68 | 522 | 13.03 |
| 2013 | 9 | 32 | 41 | 515 | 7.96 |
| 2014 | 5 | 33 | 38 | 519 | 7.32 |
| 2015 | 11 | 37 | 48 | 524 | 9.16 |
| 2016 | 8 | 30 | 38 | 522 | 7.28 |
| 2017 | 13 | 21 | 34 | 522 | 6.51 |
| 2018 | 14 | 14 | 28 | 536 | 5.22 |
| 2019 | 7 | 24 | 31 | 535 | 5.79 |
| 2020 | 4 | 17 | 21 | 531 | 3.95 |
| 2021 | 11 | 22 | 33 | 530 | 6.23 |
| 2022 | 12 | 27 | 39 | 532 | 7.34 |

With the exception of year 2018, factors outside the Company's control have caused the majority of gas line damages.

Great Plains is also required to include in its annual service quality report the information it provided to the Minnesota Office of Pipeline Safety (MNOPS), detailing the root cause of gas line damage and the type of infrastructure involved (*i.e.*, transmission, distribution). Damage incidents in 2022 included the following categories:

- No locate ticket (4 incidents)
- Failed to Determine Precise Location (9 incidents)²⁴
- Failed to maintain clearance (7 incidents)²⁵
- Incorrect Records or Maps (7 incidents)²⁶
- Mis-Marking (5 incidents)²⁷

²³ Petition, Schedules 8 and 9.

²⁴ Minnesota Statutes 216D.04, subd. 4(a): Excavator failed to determine the precise location of marked facility, within 2 feet each side of locate marks, prior to starting excavation (*i.e.*, damaged by excavation equipment, not potholing, no hand digging).

²⁵ Minnesota Statutes §216D.05 (3): Excavator failed to maintain clearance between underground utility and cutting edge of equipment (*i.e.* damaged by bucket, damaged by directional drill, damaged by trencher).

²⁶ Minnesota Rules §7560.0150, subp. 1: Facility record or map was not correct leading to facilities not being marked or mis-marked.

²⁷ Minnesota Statutes §216D.04, subd. 3(c): Facility was marked as shown on records or maps but marks were outside 2-foot tolerance zone (*i.e.*, signal bled off onto another utility).

- Caused by expired notification (2 incidents)²⁸
- Failure to protect and support during excavation (2 incidents)

The Department concludes the Company met the gas line damage reporting requirements for 2022.

K. SERVICE INTERRUPTIONS, INCLUDING MNOPS REPORTABLE EVENTS

In its 09-409 *Order*, the Commission required Great Plains to provide a summary of (1) service interruptions caused by system integrity pressure issues and (2) major incidents based on MNOPS incident reports. Table 10 below provides details on the Company's service interruptions.

Table 10: Service Interruptions for Great Plains²⁹

| Calendar Year | Number of Service Interruptions: | | | Total Number of Customers Affected | Average Duration of Interruption in Minutes ³⁰ |
|---------------|----------------------------------|--|---------------|------------------------------------|---|
| | Caused by Great Plains (A) | Caused by Factors Outside of Great Plains' Control (B) | Total (A + B) | | |
| 2012 | 13 | 35 | 48 | 115 | 222 |
| 2013 | 7 | 22 | 29 | 221 | 308 |
| 2014 | 3 | 26 | 29 | 123 | 330 |
| 2015 | 9 | 25 | 34 | 250 | 551 |
| 2016 | 6 | 32 | 38 | 213 | 236 |
| 2017 | 12 | 18 | 30 | 146 | 180 |
| 2018 | 8 | 11 | 19 | 252 | 166 |
| 2019 | 6 | 12 | 18 | 355 | 187 |
| 2020 | 3 | 9 | 12 | 216 | 150 |
| 2021 | 8 | 20 | 28 | 236 | 462 |
| 2022 | 10 | 25 | 35 | 127 | 146 |

Table 10 shows the total number of service interruptions had been decreasing since 2016, but began increasing in 2021. The Department sent an IR to the Company asking for an explanation for the significant increase in 2022, but only received a response stating the majority of interruptions were caused by contractors excavating in areas where the Company has PVC pipe.³¹

²⁸ Minnesota Statutes §216D.04, subd. 4(c): Excavator failed to make notification before the expiration time of the original notice (i.e., no additional notice).

²⁹ Petition, Schedule 10.

³⁰ The Department calculates average interruption duration as follows: (Sum of the monthly averages of interruption duration/Number of months in which one or more interruptions actually occurred). The Department further notes this calculation differs from the weighted average Great Plains used in the Report. The Department believes its calculation provides a reasonable representation of the average interruption duration.

³¹ Department Attachment 1.

In 2022, Great Plains had 35 service interruptions which impacted a total of 127 customers and one of those was reported to MNOPS. The MNOPS reported interruption was due to rerouting of traffic in Danube, MN on November 15.

Table 11:
MNOPS Reportable Interruptions for Great Plains³²

| <i>Calendar Year</i> | <i>Number of MNOPS Reportable Interruptions</i> |
|----------------------|---|
| 2012 | 0 |
| 2013 | 1 |
| 2014 | 0 |
| 2015 | 1 |
| 2016 | 0 |
| 2017 | 0 |
| 2018 | 1 |
| 2019 | 3 |
| 2020 | 4 |
| 2021 | 5 |
| 2022 | 1 |

The Department notes MNOPS reportable interruptions decreased in 2022 after steadily increasing between 2017 and 2021.

Though the Department would prefer a more detailed explanation regarding the significant increase in service interruptions, it concludes the Company has met the service interruption reporting requirements for 2022.

L. CUSTOMER SERVICE-RELATED OPERATIONS & MAINTENANCE EXPENSES; PAYROLL TAXES/BENEFITS

In its 09-409 *Order*, the Commission required Great Plains to report (1) customer service-related operation and maintenance (O&M) expenses, accounted for under the Federal Energy Regulatory Commission (FERC) 901 and 903 accounts and (2) payroll taxes and benefits. The Company's Report presents these expenditures together and combines the related data into a single schedule. Table 12 summarizes the O&M expense and payroll taxes/benefits data Great Plains submitted.

³² Petition, Schedule 10.

Table 12: Customer Service-Related O&M Expenses Plus Payroll Taxes and Benefits for Great Plains³³

| <i>Calendar Year</i> | <i>Customer Service O&M Expense Plus Payroll Taxes & Benefits: Total in Dollars (\$)</i> | <i>Customer Service O&M Expense Plus Payroll Taxes & Benefits: Monthly Average in Dollars (\$)</i> |
|----------------------|--|--|
| 2012 | 347,607 | 28,967 |
| 2013 | 364,517 | 30,376 |
| 2014 | 362,198 | 30,183 |
| 2015 | 650,117 | 54,176 |
| 2016 | 701,088 | 58,424 |
| 2017 | 636,475 | 53,040 |
| 2018 | 559,860 | 46,655 |
| 2019 | 588,341 | 49,028 |
| 2020 | 489,289 | 40,774 |
| 2021 | 523,757 | 43,646 |
| 2022 | 563,733 | 46,978 |

While total O&M expenses plus payroll taxes and benefits increased dramatically between 2014 and 2015,³⁴ the general trend thereafter has been a decline in the total and monthly average amounts. However, these expenses increased by about 7% in 2022, which the Department does not see as a cause for concern given economic conditions, particularly inflation. The Department concludes the Company met the customer service-related expenditure reporting requirements for 2022.

M. DISTRIBUTION SYSTEM PERFORMANCE MEASURES

The Commission *Order* for Docket No. G004/M-19-280, issued January 7, 2020, required Great Plains to report as part of its natural gas service quality reports, TIMP/DIMP data,³⁵ which includes leak count by facility type and threat; leak count on main by material; and leak count on service by material.

1. Distribution Integrity Management Plan Performance Measures

Table 13 and Table 13(a) summarize the data Great Plains submitted in compliance with the November 14, 2019 Order.

³³ Petition, Schedule 12.

³⁴ In its service quality report for 2015 (Docket No. G004/M-16-357), Great Plains explained costs associated with credit and collection and customer service were not being properly allocated to Great Plains. An additional \$219,095 was recorded in September 2015 to account for the misallocation.

³⁵ TIMP stands for transmission integrity management programs and DIMP stands for distribution integrity management programs.

Table 13: Leak Count by Facility Type and Threat³⁶

| | Above Ground | Mains | Services |
|-----------------------|--------------|-------|----------|
| Corrosion | 0 | 0 | 0 |
| Natural Forces | 1 | 1 | 0 |
| Excavation | 0 | 18 | 19 |
| Other Outside Forces | 2 | 0 | 1 |
| Material Failure | 0 | 1 | 6 |
| Equipment Failure | 49 | 2 | 1 |
| Incorrect Operations | 0 | 0 | 0 |
| Other Unknown/Missing | 0 | 0 | 0 |
| 2022 Total | 52 | 22 | 27 |

Table 13(a): Leak Count on Mains and Services by Material³⁷

| | Mains | Services |
|--------------|-------|----------|
| Coated Steel | 2 | 2 |
| Bare Steel | 1 | 0 |
| Plastic | 6 | 13 |
| PVC | 13 | 12 |
| Other | 0 | 0 |
| 2022 Total | 22 | 27 |

Table 13 shows gas line leaks are mainly caused by equipment failure. Such leaks decreased from 110 in 2021 to 49 in 2022. Overall, leak counts decreased significantly from 164 total leaks in 2021 to 52 total leaks in 2022.

2. Emergency Response Violations Cited by MNOPS

Great Plains had no emergency response violations cited by MNOPS in 2022.

3. Violation Letters Received by Great Plains from MNOPS

The Company received no violation letters from MNOPS in 2022.

4. Monitoring and Metrics for Excess Flow Valve Deployment and Manual Service Line Shutoff Valves

Table 14 and Table 14(a) summarize the data on Excess Flow Valves (EFVs) that Great Plains submitted in compliance with the January 7, 2020 Order in Docket No. G004/M-19-280.

³⁶ Petition, Schedule 13.

³⁷ Petition, Schedule 13.

Table 14: EFV Installation³⁸

| Customer Class | Number of Customers Suitable of EFV Installation (a) | Total Number of Installed EFVs (b) | Number of Customers Who Requested Installation (c) | Percentage of Suitable Customers With EFVs (d) | Number of Customers Unsuitable For EFVs (e) |
|------------------------------------|--|------------------------------------|--|--|---|
| | | | Subset of (b) | (b)/(a) | |
| Residential | 18,510 | 7,250 | 0 | 39.2% | 18 |
| Firm General | 2,696 | 645 | 0 | 23.9% | 45 |
| Small Interruptible | 104 | 8 | 0 | 7.7% | 49 |
| Large Interruptible | 7 | - | 0 | 0.0% | 6 |
| Small Interruptible Transportation | 6 | - | 0 | 0.0% | 3 |
| Large Interruptible Transportation | 10 | - | 0 | 0.0% | 7 |
| Unassigned | - | - | 0 | | 0 |
| Total | 21,333 | 7,903 | 0 | 37.0% | 128 |

Table 14(a): Manual Shut-Off Installation³⁹

| Customer Class | Number of Customers Suitable for Manual Shut-Off Valves (a) | Total Number of Installed Manual Shut-Off Valves (b) | Number of Customers Who Requested Installation (c) | Percentage of Suitable Customers With Manual Shut-Off Valves (d) |
|------------------------------------|---|--|--|--|
| | | | Subset of (b) | (b)/(a) |
| Residential | 18 | 18 | 0 | 100% |
| Firm General | 45 | 38 | 0 | 84% |
| Small Interruptible | 49 | 26 | 0 | 53% |
| Large Interruptible | 6 | 4 | 0 | 67% |
| Small Interruptible Transportation | 3 | 3 | 0 | 100% |
| Large Interruptible Transportation | 7 | 1 | 0 | 14% |
| Unassigned | 0 | 0 | 0 | 0% |
| Total | 128 | 90 | 0 | 70% |

³⁸ Petition, Schedule 14.

³⁹ Petition, Schedule 14.

On February 23, 2021 the Commission ordered in Docket No. G-999/CI-18-41 utilities to submit all remaining Excess Flow Valve status update reports in their annual Gas Service Quality Reports starting in 2021, rather than the previously ordered March 31st deadline. Great Plains reports the following EFV status update pursuant to Paragraphs 7a through 7c of the Commission's *Order* issued on August 20, 2018:

7a. Customers within Great Plains' service territory that do not already have EFVs (and are eligible under the Federal standards) or manual shutoff valves and are not within an area the utility plans to upgrade by 2025:

- K-12 public and non-public schools (35 customers)
- Public and private universities and colleges (10 customers)
- Hospitals (29 customers)
- Multi-unit residential and nursing facilities (256 customers)

7b. Great Plains continues to post EFVs information on its website. Customers were notified of their EFV options through an annual bill insert mailed to them in June 2020-2023. The Company will also continue to review its ongoing projects and provide customers with information regarding the Company's planning and replacement projects.

7c. Great Plains did not propose another method for limiting the visits to its customers identified in 7a. The Company also did not propose any recovery mechanism regarding the incremental costs of implementing additional requirements in the August 20 Order mentioned above as the Company does not anticipate any significant costs for the face-to face meetings with the identified customer categories in 7a.

The Department concluded the Company has met its reporting requirements for Excess Flow Valves.

N. NATIONAL/REGIONAL SERVICE QUALITY COMPARISON DISCUSSION

Great Plains, along with Xcel Gas, CenterPoint Energy, Minnesota Energy Resources Corporation, and Greater Minnesota Gas (the Gas Utilities) made a joint filing on October 1, 2021⁴⁰ in response to the Commission's request that the Gas Utilities "identify already existing industry service quality comparisons, what service qualities could be best for comparison, appropriate similar utilities to compare against, and how such a national comparison could be integrated in the future service quality reporting."

⁴⁰ Great Plains Docket No. G-004/M-21-300, *Compliance Filing*

In that filing the Gas Utilities delineated their efforts to identify different existing natural gas local distribution benchmarking efforts at the regional or national level. They concluded:

Because the Gas Utilities have not been able to identify any universally reported service quality metrics beyond those regarding safety and reliability, the Gas Utilities are unable to suggest service quality metrics that would be suitable for comparison. Likewise, with the exception of the information in the J.D. Power report, the Gas Utilities are not aware of a means to identify similar utilities to compare against. . .the Gas Utilities are, quite frankly, at a loss as to how a regional or national comparison could be integrated into future service quality filings.

The Department advised the Commission at its agenda meeting on the Gas Utilities 2020 SRSQs on July 15, 2021 that the American Gas Association (AGA) might serve as a clearinghouse for national service quality benchmarking standards. The Department was hoping the AGA would be tracking a sufficient level of information so that it would provide an “off-the-shelf” benchmarking option for the Commission. The Gas Utilities apparently contacted AGA and AGA responded that in fact, it did not provide that service as the Gas Utilities noted in their October 1, 2021 joint filing.

The Commission, as part of its order for Docket No. G-022/M-21-304, issued August 5, 2022, included the following:

Delegated authority to the Executive Secretary to implement a working group with regulated Gas Utilities, the Department of Commerce, Minnesota Office of Pipeline Safety (MnOPS), and Commission staff to continue exploring comparative performance metrics.

Regarding, comparative performance metrics, the Department remains willing to participate in the working group to continue exploring comparative performance metrics and looks forward to contributing.

O. WEB-BASED SERVICE METRICS

The Department recommended additional information in the electric utilities’ service reliability and service quality reports related to web-based service metrics during the 2021 reporting cycle. As part of its order in In Docket No. G-022/M-21-300, the Commission requested “the Gas Utilities propose a web-based service metrics similar to that required of electric utilities by September 1, 2022 as a supplemental filing in their 2021 gas service quality report dockets.”⁴¹

In response to this order, on September 1, 2022, the Gas Utilities, including Great Plains, submitted a joint compliance filing in which they outlined their proposed web-based service metrics. The Gas

⁴¹ Great Plains Docket No. G-004/M-21-300, PUC Order

Utilities expect to first report on the below information in their annual service quality reports for 2023, which will be filed in 2024:

| | | |
|-----------------------|------------------|---------------------|
| Percentage Uptime | | [to second decimal] |
| | General Website | XX.XX% |
| | Payment Services | XX.XX% |
| Error Rate Percentage | | [to third decimal] |
| | Payment Services | XX.XXX% |

Additional metrics regarding electronic customer interaction:

- Yearly total number of website visits
- Yearly total number of logins via electronic customer communication platforms
- Yearly total number of emails or other customer service electronic communications received.
- Categorization of email subject and electronic customer service communications by subject, including categories for communications related to assistance programs and disconnections as part of reporting under Minnesota Rules 7826.1700.

The Gas Utilities explained that while they believe their respective technology systems can facilitate this reporting, there may be situations where they cannot use an automated method to pull the data. The Gas Utilities do not believe it would be an appropriate use of resources to hand tabulate metrics. In such cases, they suggest the utility could report the information is unavailable and suggest the utility should be excused from providing that data.⁴²

The Commission, as part of its order for Docket No. G-004/M-22-211, issued May 1, 2023, ordered the natural gas utilities to jointly file a reporting template for web-based metrics in .xlsx format within 90 days of that order, including the following:

- a. A uniform list of customer service electronic communication types
- b. A uniform list of subjects for which to categorize email or customer service communications based on the complaint reporting categories outlined in Minn. Rules. 7826.2000 when feasible.

In the same docket, natural gas utilities, including Great Plains filed an extension request dated August 1, 2023. In it, the utilities state they have met several times but ran out of time at their last meeting to discuss the reporting template for web-based metrics. The extension request was for 30 days following the conclusion of the Natural Gas Working Group (NGWG) process or that it “be incorporated in the NGWG recommendations.”⁴³ In an order dated August 22, 2023, the Commission accepted the extension request.

The Department supports these proposals and will watch for future iterations of reporting on these metrics.

⁴² Great Plains Docket No. G-004/M-21-300, *Compliance Filing – Joint Supplemental Letter*

⁴³ Great Plains Docket No. G-004/M-22-211, *Joint Natural Gas Utilities Extension Variance Request*

III. RECOMMENDATIONS

Based on its review, the Department recommends that the Commission accept Great Plains' 2022 *Annual Service Quality Report*.

Regarding, comparative performance metrics, the Department remains willing to participate in the working group to continue exploring comparative performance metrics and looks forward to contributing.



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G-004/M-23-78

Requested From: Great Plains Natural Gas Co.

Type of Inquiry: General

☐ Nonpublic ☒ Public

Date of Request: 8/22/2023

Response Due: 9/1/2023

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Felicia Cullen

Email Address(es): felicia.cullen@state.mn.us

Phone Number(s): 651-539-1787

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 1
Topic: Gas Emergency Response Times
Reference(s): Petition, page 4 and Schedule 7

Request:

According to Schedule 7 of the Petition, the average response time was 24 minutes which was 5 minutes longer than 2021, and longer than any year since 2012. To what does the Company attribute this?

Response:

As noted on page 4 of the petition, Great Plains did have 15 instances in 2022 where the response time exceeded an hours' time. The longer response times were due to travel distance and/or winter weather conditions as well as after-hours calls and one instance where the tech was on another call and was aware that the call was a follow-up response as shown in the table below. Upon further review of the response times for this information request, the Company did identify two instances included in Great Plains' May 1, 2023 filing where the actual response time was less than that reflected in the report. Both were instances where the tech was not able to record the time at their arrival and therefore logged their arrival at a later time. The January instance results in a reduction in the average response time. The March instance reduces the response time to less than an hour and therefore lowers the Company's total instances of response times exceeding an hours' time to 14 occurrences. Attached is a revised Schedule 7 reflecting the corrections noted.

| Date | Dispatch Time | Arrival Time | Response Time (minutes) |
|---------------------------|---------------|--------------|-------------------------|
| Sunday January 9, 2022 | 5:10 AM | 9:06 AM | 63 1/ |
| Thursday February 3, 2022 | 8:09 AM | 9:12 AM | 63 |
| Saturday March 5, 2022 | 9:26 AM | 10:30 AM | 64 |

To be completed by responder

Response Date: August 30, 2023
Response by: Travis R. Jacobson
Email Address: travis.jacobson@mdu.com
Phone Number: 701-222-7855



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G-004/M-23-78

Requested From: Great Plains Natural Gas Co.

Type of Inquiry: General

☐ Nonpublic ☒ Public

Date of Request: 8/22/2023

Response Due: 9/1/2023

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Assigned Analyst(s): Felicia Cullen

Email Address(es): felicia.cullen@state.mn.us

Phone Number(s): 651-539-1787

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| | | | |
|----------------------------|----------|----------|-------|
| Sunday March 6, 2022 | 3:26 AM | 4:20 AM | 54 1/ |
| Friday March 18, 2022 | 5:10 PM | 6:10 PM | 60 |
| Friday June 16, 2022 | 6:11 PM | 7:19 PM | 68 |
| Friday July 15, 2022 | 4:39 PM | 5:46 PM | 67 |
| Saturday July 16, 2022 | 10:45 AM | 11:49 AM | 64 |
| Sunday July 17, 2022 | 8:43 AM | 10:03 AM | 80 |
| Sunday July 17, 2022 | 4:36 PM | 5:42 PM | 66 |
| Tuesday July 19, 2022 | 5:51 PM | 7:01 PM | 70 |
| Monday October 24, 2022 2/ | 9:38 AM | 1:15 PM | 217 |
| Saturday November 12, 2022 | 1:11 PM | 2:56 PM | 105 |
| Sunday November 13, 2022 | 5:01 PM | 6:11 PM | 70 |
| Saturday December 24, 2022 | 1:33 PM | 2:49 PM | 76 |

1/ Reflects corrected duration time.

2/ Instance of tech being on another call and was aware that the call was a follow-up response.

To be completed by responder

Response Date: August 30, 2023
Response by: Travis R. Jacobson
Email Address: travis.jacobson@mdu.com
Phone Number: 701-222-7855

**Great Plains Natural Gas Co.
Gas Service Quality Annual Report
For the Calendar Year Ending December 31, 2022**

Revised Gas Emergency Response Times

| | Total | Jan | Feb | Mar | Apr | May | June | July | Aug | Sept | Oct | Nov | Dec |
|---|------------|-----------|-----------|-----------|------------|------------|-----------|-----------|------------|------------|-----------|-----------|-----------|
| Calls Responded to in 1 hour or less Percentage | 466 97% | 36 97% | 27 96% | 30 94% | 30 100% | 36 100% | 63 98% | 43 90% | 17 100% | 29 100% | 51 98% | 46 96% | 58 98% |
| Calls Responded to in over 1 hour Percentage | 14 3% | 1 3% | 1 4% | 2 6% | 0 0% | 0 0% | 1 2% | 5 10% | 0 0% | 0 0% | 1 2% | 2 4% | 1 2% |
| Total Calls | 480 | 37 | 28 | 32 | 30 | 36 | 64 | 48 | 17 | 29 | 52 | 48 | 59 |
| Average Response Time (in minutes) | 24 | 24 | 20 | 21 | 16 | 23 | 23 | 29 | 31 | 19 | 24 | 30 | 25 |
| | | 100.00% | 100.00% | 100.00% | 100.00% | 100.00% | 100.00% | 100.00% | 100.00% | 100.00% | 100.00% | 100.00% | 100.00% |



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SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Felicia Cullen

Email Address(es): felicia.cullen@state.mn.us

Phone Number(s): 651-539-1787

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 2
Topic: Service Interruptions
Reference(s): Petition, page 5 and Schedule 10.

Request:

According to Schedule 5 of the Petition, during 2022, there were a total of 36 gas service interruptions due to all causes. This is a significantly higher number than all years since 2016. Please explain the reason for this increase.

Response:

Great Plains did see a higher number of unplanned outages in 2022 with the majority of those outside the Company's control and where contractors are excavating in an area where the Company has PVC pipe.

| Year | Total Service Interruptions | Caused by Factors Outside Company Control |
|------|-----------------------------|---|
| 2022 | 35 | 25 |
| 2021 | 28 | 20 |
| 2020 | 12 | 9 |
| 2019 | 18 | 12 |
| 2018 | 19 | 11 |
| 2017 | 30 | 18 |
| 2016 | 38 | 32 |

To be completed by responder

Response Date: August 30, 2023
Response by: Travis R. Jacobson
Email Address: travis.jacobson@mdu.com
Phone Number: 701-222-7855

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. G004/M-23-78

Dated this **28th** day of **September 2023**

/s/Sharon Ferguson

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|----------------|--------------------------------|--------------------------------------|------------------------------------|--|--------------------|-------------------|----------------------|
| Generic Notice | Commerce Attorneys | commerce.attorneys@ag.state.mn.us | Office of the Attorney General-DOC | 445 Minnesota Street Suite 1400 St. Paul, MN 55101 | Electronic Service | Yes | OFF_SL_23-78_M-23-78 |
| 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_23-78_M-23-78 |
| Travis | Jacobson | travis.jacobson@mdu.com | Great Plains Natural Gas Company | 400 N 4th St Bismarck, ND 58501 | Electronic Service | No | OFF_SL_23-78_M-23-78 |
| Generic Notice | Residential Utilities Division | residential.utilities@ag.state.mn.us | Office of the Attorney General-RUD | 1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131 | Electronic Service | Yes | OFF_SL_23-78_M-23-78 |
| Will | Seuffert | Will.Seuffert@state.mn.us | Public Utilities Commission | 121 7th PI E Ste 350 Saint Paul, MN 55101 | Electronic Service | Yes | OFF_SL_23-78_M-23-78 |
| Caitlin | Straabe | caitlin.straabe@mdu.com | Great Plains Natural Gas Co. | 400 N 4th St Bismarck, ND 58501 | Electronic Service | No | OFF_SL_23-78_M-23-78 |