

**Minnesota Public Utilities Commission**  
*Staff Briefing Papers*

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Meeting Date: **April 1, 2014** .....\*Agenda Item #10

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Companies: Interstate Power and Light (IPL)

Docket No. G001/M-13-324

In the Matter of Interstate Power and Light Company's 2012 Annual Gas Service Quality Report

Issues: Should the Commission Accept the Company's Annual Gas Service Quality Report?

Staff: Marc Fournier .....651-201-2214

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***Relevant Documents***

Commission Order Setting Reporting Requirements  
G-999/CI-09-409..... August 26, 2010

Commission Order Setting Further Requirements  
G-002/M-11-360, et. al ..... March 6, 2012

Interstate Power and Light Company's  
Annual Service Quality Report. .... May 1, 2012

Comments of the Minnesota Department of Commerce  
Division of Energy Resources. .... December 19, 2013

Reply Comments of Interstate Power and Light Company. .... January 27, 2014

Response Comments of the Minnesota Department of Commerce  
Division of Energy Resources. .... March 18, 2014

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The attached materials are workpapers 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.

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## **Statement of the Issues**

Should the Commission accept the Company's Annual Gas Service Quality Report for 2012?

## **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 interested parties in Docket No. G999/CI-09-409. On August 26, 2010, the Commission issued an Order Setting Reporting Requirements in Docket G-999/CI-09-409 (09-409 Order). This Order prescribed a list of indicators for which data for each calendar year are to be provided by each utility in a miscellaneous tariff filing to be made by the following May 1.

Interstate Power and Light Company (Xcel or the Company) was allowed to report commingled gas and electric statistics for mislocates, meter reads, and answer times for its utility call centers. For the first year, the Company was allowed to report only as much data as possible from 2010 for service extension response times. For events reportable to the Minnesota Office of Pipeline Safety (MOPS), all utilities were ordered to notify the Commission and the DOC simultaneous with their notice to MOPS.

In addition to the requirements in the 09-409 Order, the Commission's March 6, 2012 Order (11-360 Order) in Docket No. G002/M-11-360, et. al<sup>1</sup> directed all regulated Minnesota gas utilities to:

- In future annual reports, include data on average speed of answering calls, in addition to reporting on the percentage of calls answered within 20 seconds or less;
- Explain in their 2011 annual reports, whether the difference between the total percentage of meters (100%) and the percentage of meters read (by both the utility and customers) is equal to the percentage of estimated meter reads;
- Explain, beginning with their 2011 annual reports, the types of extension requests (such as requests for reconnection after disconnection for non-payment) they are including in their data on service extension request response times for both locations not previously served, as well as for locations that were not previously served;
- Explain, beginning with their 2011 annual reports, the types of deposits (such as new deposits from new and reconnecting customers and the total number of deposits currently held) included in the report number of "required customer deposits"; and
- Describe, beginning with their 2011 annual reports, the types of gas emergency calls included in their gas emergency response times, as well as the types of emergency calls included in their reports to the Minnesota Office of Pipeline Safety (MOPS). Provide an explanation of any difference between the reports provided to

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1 This Order included Interstate in Docket 11-361.

the Commission and to MOPS.

In the 11-360 Order, the Commission also specifically directed Interstate to:

- Beginning in its 2011 annual report, provide the number of miles of pipe it operates in Minnesota;
- Explain how it calculates its 2011 “percentage of calls answered within 20 seconds;”
- Beginning in its 2011 annual report, provide the number of locate requests; and
- Beginning in its 2011 annual report, report all gas service interruptions on its system (not only those service interruptions immediately reportable to the Minnesota Office of Pipeline Safety).

Further, the 11-360 Order directed the Minnesota natural gas utilities subject to the 09-409 Order to convene a workgroup to address improving consistency in reporting and to address certain other reporting issues. The workgroup<sup>1</sup> met on June 22, 2012 and developed more uniform reporting criteria. Reporting changes as a result of the workgroup consensus are noted in the analysis below, and are referred to as done in compliance with the Commission’s 11-360 Order.

On May 1, 2013, the Company filed its calendar year 2012 Annual Service Quality Report (Report).

### **Interstate Power and Light Company’s (IPL) 2011 Gas Service Annual Report**

#### **1. Call Center Response Time/Average Speed of Answer & Percentage of Calls Answered Within 20 Seconds or Less**

Standard: Each utility is required to report call center response time in terms of the percentage of calls answered within 20 seconds.

**IPL:** The required information was provided in Attachment A of the Company’s 2012 Report.

**DOC:** For 2012, the Company reported that it met the annual standard of answering 80 percent of call center calls in 20 seconds or less. The average over 12 months was 88.4 percent, while the monthly percentages ranged from a low of 84.6 percent in August to a high of 94.0 percent in February 2012.

The DOC acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-360 Orders.

## 2. Meter Reading Performance

Standard: Each utility shall report the meter reading performance data contained in Minn. Rules, part 7826.1400. The reporting metrics include a detailed report on meter-reading performance for each customer class and for each calendar month:

- The number and percentage of customer meters read by utility personnel;
- The number and percentage of customer meters self-read by customers;
- The number and percentage of customer meters estimated;
- The number and percentage of customer meters that have not been read by utility personnel for periods of 6 to 12 months and for periods longer than 12 months, and an explanation as to why they have not been read; and
- Data on monthly meter-reading staffing levels, by work center or geographical area.

**IPL:** IPL met the meter reading performance requirements under Minnesota Rules, part 7826.0900 in all months except December 2012.

Due to an unexpected number of sick and vacation days taken by its meter reading staff, IPL's meter reading performance dropped to 76% during the month of December 2012. Additional data relating to IPL's meter reading performance may be found in Appendix A at the end of the Company's report. Data reported contains both gas and electric information. In the tabular data, the difference between the total percentage of meters and the percentage of meters read (by IPL and customers) is equal to the percentage of estimated meter reads.

**DOC:** Interstate reported that an annual average of 92.7 percent of customer meters were read by utility personnel and 0.02 percent were ready by the customer in 2012. In each month, at least 90 percent of the Company's Minnesota meters were read. IPL stated that only 75.7 percent of meters were read by the Company in December due to winter weather conditions, an extended maternity leave, and higher than expected sick and vacation days taken by staff. Per the 11-360 Order, Interstate explained that the difference between the total percentage of meters read (by IPL and customers) and 100 percent is equal to the percentage of estimated meter reads.

Interstate provided the number of meters unread for 6 to 12 months and for more than 12 months for its Residential, Commercial, Industrial, and Rural customer classes. The Table below summarizes the number of meters not read by utility personnel for longer than 12 months according to Interstate's current and past annual reports.

**Meters Not Read for Longer than 12 Months**

	Residential	Commercial	Industrial	Rural	Total
2010	0	0	0	0	0
2011	18	0	0	0	18
2012	0	0	0	0	0

Interstate provided its monthly staffing levels, which remained at 11 meter reading staff throughout the year.

The DOC acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-360 Orders.

**3. Involuntary Service Disconnection**

**Standard:** In lieu of reporting data on involuntary service disconnections as contained in Minn. Rules, part 7826.1500, each utility shall reference the data that it submits under Minn. Stat.216B.091 and 216B.096.

**IPL:** A copy of the monthly Cold Weather Rule reports is included beginning on page 4 of Appendix A at the end of the Company's report.

**DOC:** The DOC's table below provides a summary of customer disconnection statistics reported by the Company in its Cold Weather Rule reports.

	Customers Receiving Disconnect Notice	Customers Seeking CWR Protection	Customers Granted CWR Protection	% Granted	Customers Disconnected Involuntarily	Customers Restored Within 24 Hours	Customers Restored by Entering Payment Plan
2010	37,997	1,976	1,976	100%	509	96	11
2011	42,347	3,772	3,772	100%	490	63	19
2012	39,200	5,328	5,328	100%	511	91	0

The DOC indicated that the information in the table above does not reconcile with the involuntary disconnection information contained in its companion report filed in Docket No. E001/M-13-249. The DOC requested that IPL provide a reconciliation in its reply comments.

The DOC acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-360 Orders.

**IPL Reply:** IPL reviewed its information and discovered that there was a data entry and calculation error contained in the monthly Cold Weather Rule Summary Report as filed on May 1, 2013, in Appendix A, page 4, included within its initial May 1, 2013, filing in this docket. The Company attached a corrected version of the Cold Weather Rule Summary Report, pages 4

through 6.

#### **4. Service Extension Request Response Time**

Standard: Each utility shall report the service extension request response time data contained in Minn. Rules, part 7826.1600, items A and B., except that data reported under Minn. Stat. 216B.091 and 216B.096, subd.11, is not required.

- a) The number of customers requesting service to a location not previously served by the utility and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service; and
- b) The number of customers requesting service to a location previously served by the utility, but not served at the time of the request, and the interval between the date service was installed and the date the premises were ready for service.

**IPL:** IPL received requests for gas service at new locations during all months except January and February. For commercial customers, the time between notification of readiness and the actual installation date was approximately five days. For residential customers, the time span was approximately five days. For locations not previously served, the data measures the time for new service to be initiated at the new location. For locations that were previously served, the data covers all requests for initiation of service, including reconnects for credit/non-payment issues. IPL's data collection methodology does not differentiate between the types of requests at these previously served locations. Specific monthly details on IPL's service extension response times may be found in Appendix A, page 7 of the Company's 2012 report.

**DOC:** Interstate further explained that it received requests for gas service at new locations during each month in 2012 except for January and February.

For locations previously served, Interstate does not differentiate between the types of requests, therefore reported data covers all requests for initiation of service including reconnects for credit/nonpayment issues. The Company stated that it does not track response time by account for previously served locations, however requests are typically handled the next business day. For locations not previously served, the average response time to commercial requests was 5.3 days, while the average response time to residential requests was 4.7 days. These averages are generally timely and fairly consistent with last year's averages.

The DOC acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-360 Orders.

#### **5. Customer Deposits**

Standard: Each utility shall report the customer deposit data contained in Minn. Rules, part

7826.1900.

**IPL:** On average, 36 customers per month were required to provide a deposit prior to initiating service. The monthly average number of customers required to make a deposit for 2009, 2010, and 2011 were 28, 38, and 34 respectively. The types of deposits included in the data are for new and reconnecting customers. As of December 31, 2012, IPL held 936 deposits for Minnesota gas and electric customers with a total value of \$209,655. Additional customer deposit data may be found in Appendix A, page 8 at the end of the report. The information provided contains both gas and electric data.

**DOC:** The reporting metric for customer deposits is the number of customers required to make a deposit as a condition of receiving service. Interstate reported a total of 434 such accounts for both its natural gas and electric operations in 2012.

Per the 11-360 Order, the utilities were required to explain the types of deposits included in the reported number of “required customer deposits.” Interstate stated that its data included deposits for new and reconnecting Minnesota customers. The Company also reported that as of December 31, 2012 it held 936 deposits for a total of \$209,655.

The DOC acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-360 Orders.

## 6. Customer Complaints

Standard: Each utility shall report the customer complaint data contained in Minn. Rules, part 7826.2000.

**IPL:** The information provided contains both gas and electric data. During 2012, IPL averaged 29 customer complaints per month, with the top five categories being General Billing, Tree Trimming, Property Damage, Engineering/Construction and Maintenance, and Payment Status. These five categories account for approximately 62% of the customer complaints received during the year. The monthly average number of customer complaints received by IPL for 2009, 2010, and 2011 were 67, 48, and 30 respectively. Detailed customer complaint is located in Appendix A, pages 9-19 of the Company’s annual Gas Service Quality Report.

**DOC:** Interstate reported that it received 349 electric and natural gas complaints in 2012, four of which were forwarded to the Consumer Affairs Office. Data provided by the Company showed that 23.5 percent of complaints were resolved upon initial inquiry. The most frequent complaint category was “Property Damage.” Interstate reported that 56 percent of these complaints were resolved by taking the action the customer requested. These statistics represent an improvement in total complaints reported, but a decline in complaints resolved by taking action the customer requested (56 percent) compared to 2011 (59 percent) and 2010 (60 percent).



The DOC acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-360 Order.

## **7. Gas Emergency Calls**

Standard: Each utility shall report the data on telephone answering times to its gas emergency phone line calls.

**IPL:** For 2012, IPL fielded 2,733 emergency calls, with an average answer time of 28 seconds. This call volume includes both gas and electric callers who responded “Yes” to the initial interactive voice response question, “Is this a life threatening emergency, such as a downed wire or gas odor?” Detailed call answer time data were provided in Appendix A, page 20.

IPL also provides a direct phone number to emergency responders, fire, and law enforcement personnel that places them at the top of the queue when calling to report an emergency situation. The average answer time for the 326 calls to this direct emergency line was 8 seconds during 2012. Monthly data for these calls may also be found on page 20 of Appendix A.

**DOC:** In 2012, Interstate fielded a total of 2,733 emergency phone calls during the year with 326 calls to the Company’s direct emergency line. The average response time for all emergency calls was approximately 28 seconds, and the average response time for the direct emergency line was 8.4 seconds.

Response time to all emergency calls improved from approximately 31 seconds last year, and the response time to direct emergency calls improved greatly from an average of 143.7 seconds last year. The DOC appreciates Interstate’s efforts to improve this area of service quality.

The DOC acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-360 Order.

## **8. Gas Emergency Response Times**

Standard: Each utility shall report data on gas emergency response times and include the percentage of emergencies responded to within one hour and within more than one hour. CenterPoint, IPL, and MERC shall also report the average number of minutes it takes to respond to an emergency.

**IPL:** In 2011, IPL responded to 100% of 245 gas emergency calls within 60 minutes, with an average gas emergency response time of 18.8 minutes.

IPL codes the following issues as emergency calls: Carbon Monoxide, Fire, Line Hit, and Odor. Any call that is coded as an emergency will be included in the statistical reports submitted both to the Commission and MNOPS.

**DOC:** The Company stated that it was able to respond to 100 percent of its 245 emergency calls in less than one hour. In terms of average response time, Interstate was able, on a monthly basis, to respond to emergency calls in less than 23 minutes. On an annual basis, the Company's average response time was 18.8 minutes. The DOC commends Interstate for improving its average response time from last year and encourages the Company to maintain this level of service or better in future years.

In the 11-360 Order, all gas utilities were required to describe the types of gas emergency calls included in their gas emergency response times, as well as the types of emergency calls included in their reports to MOPS. The utilities were also required to provide an explanation of any difference between the reports provided to the Commission and to MOPS. Interstate provided types of calls classified as emergencies and stated that any call that is coded as an emergency will be included in the statistical reports submitted both to the Commission and MOPS.

The DOC acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-360 Orders.

## **9. Mislocates**

Standard: Each utility shall report the data on mislocates, including the number of times a line is damaged due to mismarked or failure to mark a line.

**IPL:** In 2012, IPL had one gas line damaged as a result of a mismarked line or failure to mark a line. In 2012, IPL received a total of 14,421 locate requests covering its Minnesota electric and gas service territory. Of that number, approximately 2,681 resulted in actual field locates for gas facilities. This data yields a mismark rate of 0.04% and a failure to mark rate of 0.04%. A table containing the locate data can be found on page 21 of Appendix A.

**DOC:** Interstate reported two instances of gas line damage in 2012, one due to mismarked and one due to unmarked lines out of 14,421 gas and electric locate requests, or a rate of .14 per 1,000 requests.

The DOC acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-360 Orders.

## **10. Gas System Damage**

Standard: Each utility shall report data on the number of gas lines damaged. The damage shall be categorized according to whether it was caused by the utility's employees or contractors, or whether it was due to any other unplanned cause.

**IPL:** In 2012, there were fifteen instances where IPL’s gas facilities were damaged during excavation activities. None of those damages were caused by IPL electric employees or contractors working on IPL’s behalf installing electric facilities. Of the 15 damages, eight were attributable to power operated equipment (backhoes, augers, directional drill), four were caused by hand tools, two were caused by stakes driven into the ground, and one was caused by the friction of a new copper water line being pulled into place by the old waterline and rubbing against a plastic gas main. The table below lists gas damages by month.

**Gas Damages by Month**

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
<b>Gas Damages</b>	0	0	1	2	0	1	3	1	3	1	3	0	15

**DOC:** Interstate reported 15 incidents of gas system damage in 2012. This calculates to a rate of 6.33 incidents per 100 miles of main.

The DOC acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-360 Order.

**11. Gas Service Interruptions**

Standard: Each utility shall report data on service interruptions. Each interruption shall be categorized according to whether it was caused by the utility’s employees or contractors, or whether it was due to any other unplanned cause.

**IPL:** In 2012, there were zero service interruptions on IPL’s gas system due to system integrity issues. Of the fifteen excavation damages cited in Part J of the Company’s Service Quality Report, twelve resulted in gas outages to at least one customer. None of the fifteen outages was attributed to actions of IPL or one of its contractors. Of those twelve hits resulting in an outage, eight resulted in an outage to only a single customer, while four resulted in outages to multiple customers. Only three of the outages met the incident reporting criteria for the Minnesota Office of Pipeline Safety (MOPS or MNOPS), as gas service to more than fifty customers was interrupted.

For those twelve line hits that resulted in an outage to a customer, the average outage duration was approximately 136 minutes. The outage duration is based on the cumulative time from the initial notification to the time the gas line was repaired, purged, and depressurized so relight(s) can begin. This definition is consistent with the definition contained on the MNOPS Emergency Response Reporting Form. As all but one of the outages in 2012 involved six or fewer customers, relights typically took approximately one hour. For the remaining outage, relights were completed on fourteen of the fifteen affected customers within 2 ½ hours following completion of the repairs. The last customer was door-tagged and relit three days later when requested by the customer. Copies of IPL’s MNOPS bi-monthly Emergency Response Reporting Forms for 2012 are included

starting on page 22 of Appendix A.

**DOC:** Interstate reported that there were no service interruptions during the reporting period that were the result of system integrity issues. Interstate further reported that of the 15 damage instances discussed in the DOC comments, 12 resulted in gas outages to at least one customer, and only three events met MOPS reporting criteria.

The DOC acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-360 Orders.

## **12. MOPS Summaries K**

Each utility shall report summaries of major events that are immediately reportable to the Minnesota Office of Pipeline Safety (MOPS) according to the criteria used by MOPS to identify reportable events. Each utility shall also provide summaries of all service interruptions caused by system integrity pressure issues. Each summary shall include the following ten items:

- the location;
- when the incident occurred;
- how many customers were affected;
- how the company was made aware of the incident;
- the root cause of the incident;
- the actions taken to fix the problem;
- what actions were taken to contact customers;
- any public relations or media issues;
- whether the customer or the company relighted; and
- the longest any customer was without gas service during the incident.

**IPL:** The three incidents that met the MNOPS incident reporting threshold in 2012 are described below. All three of these incidents were reported to the Commission via the required email report at the time they occurred. A copy of the emails is included starting on page 28 of Appendix A.

- At approximately noon on Thursday, April 26, 2012, IPL was notified that a 1 ¼ inch gas main had been hit by a directional drilling contractor on 4th Street NW in Adams. This incident met the MNOPS reporting threshold due to the fact that 10 houses were evacuated as a precaution because of the blowing gas. The evacuated customers returned to their homes after approximately two hours. No customers lost gas service as a result of the main hit. While on site making repairs to the main, IPL crews were informed of a gas odor by a customer down the street, and upon investigating, discovered that a ½ inch gas service line had also been hit. After repairs were made to the service line, the affected customer was relit by an IPL employee after approximately one hour. Both of these hits were the result of the contractor not properly exposing IPL facilities as they were being crossed by the drill head. There were no media issues to report.

- At 11:03 a.m. on August 20, 2012, IPL received a call that the 55 psig, 1 ¼ inch gas main at 508 W Main Street in Adams had been hit by a contractor performing water main installation with a directional drill. IPL crews were dispatched and a 2 inch polyethylene gas main was squeezed off at 12:03 p.m. to shut off the flow of gas. As a result, 15 customers were out of service. This was a MNOPS reportable incident because emergency responders closed Highway 56 and evacuated approximately 10 customers. After repairing the line, IPL crews began relighting customers, approximately 4 hours after the line was squeezed off. The contractor performing the directional drilling work appeared to have appropriate locates, but a spoil pile had been placed over the markings and the gas line was not exposed. There were no media issues to report.
- At approximately 12:45 p.m. on the afternoon of October 9, 2012, IPL received a report of a gas odor at the Albert Lea High School. It was also reported that the school was being evacuated, which caused this to be a MNOPS reportable event. IPL emergency responders discovered a faulty valve on a Bunsen burner in one of the science classrooms that was not sealing off completely and was allowing a small amount of gas to leak out. As this leak was on customer piping, the valve was isolated and the high school's maintenance personnel were scheduled to make the necessary repairs. The school was cleared for the students to return by 1:30 p.m. that afternoon. It should be noted that this incident did not result in an interruption of service to the high school, although the school was evacuated as a safety precaution until the leaking valve was isolated. No other customers were impacted by the incident. There were no media issues to report.

**DOC:** The Company provided summaries for these incidents, which included the required information listed above. The DOC notes that according to Interstate, customers affected by these interruptions were restored the same day.

The DOC acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-360 Orders.

### **13. Emergency Response Time**

Standard: Each utility shall report data on gas emergency response times and include the percentage of emergencies responded to within one hour and within more than one hour. IPL shall also report the average number of minutes it takes to respond to an emergency.

**IPL:** In 2012, IPL responded to 99.2 percent of 253 gas emergency calls within 60 minutes, with an average gas emergency response time of 17.9 minutes. The two calls that exceeded the 60 minute timeframe were 61 minutes and 75 minutes, respectively.

IPL codes the following issues as emergency calls: Carbon Monoxide, Fire, Line Hit, and Odor. Any call that is coded as an emergency will be included in the statistical reports submitted to both the Commission and MNOPS.

**DOC:** The Company stated that it was able to respond to 99.2 percent of its 253 emergency calls in less than one hour. Two calls exceeded the 60 minute timeframe; one had a response time of 61 minutes, the other had a response time of 75 minutes. In terms of average response time, Interstate was able, on a monthly basis, to respond to emergency calls in 22.1 minutes or less. On an annual basis, the Company's average response time was 17.9 minutes. In the 11-360 Order, all gas utilities were required to describe the types of gas emergency calls included in their gas emergency response times, as well as the types of emergency calls included in their reports to MOPS. The utilities were also required to provide an explanation of any difference between the reports provided to the Commission and to MOPS. Interstate provided types of calls classified as emergencies and stated that any call that is coded as an emergency will be included in the statistical reports submitted both to the Commission and MOPS. Finally, the utilities participating in the workgroup indicated that they would provide complete and nonredacted copies of their MOPS Emergency Response Reporting Forms; Interstate provided copies for calendar year 2012.

The DOC acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-360 Orders.

### **13. Customer Service Related Operations and Maintenance Expenses**

**Standard:** Each utility shall report customer-service related operations and maintenance expenses. The reports shall include only Minnesota-regulated, customer-service expenses based on the costs recorded in FERC accounts 901 and 903 plus payroll taxes and benefits.

**IPL:** In 2012, customer-service related costs related to FERC accounts 901 and 903 were \$5,422 and \$108,407, respectively. These costs include payroll taxes and benefits.

**DOC:** The DOC acknowledges that Interstate has fulfilled the requirements of the 09-409 Order.

### **Staff Analysis**

Staff recommends that the Commission accept IPL's filing. It appears that IPL in reply comments addressed statistical discrepancy issue raised by the DOC regarding involuntary service disconnections.

Finally, the workgroup appears to have made some progress on ensuring consistency in reporting this service quality data. Staff is interested in further exploring ways of making this data more efficiently reported to the Commission, and overall streamline the process. An example of this might be to put this in a spreadsheet report of all data which will allow for a more graphic presentation.

### ***Commission Options***

1. Accept IPL's 2012 Gas Service Quality Report.
2. Do not accept IPL's 2012 Gas Service Quality Report.

***Recommendation***

Staff recommends that the Commission adopt alternative number 1.