

This question is:

Trade Secret  
 Public

**State of Minnesota  
Public Utilities Commission**

**Utility Information Request**

Docket Numbers: G004/M-18-286, G008/M-18-312, G022/M-18-314, G002/M-18-316,  
and G011/M-18-317

Date of Request: October 12, 2018

Requested From: CenterPoint Energy,  
Great Plains Natural Gas Company,  
Greater Minnesota Gas, Inc.,  
Minnesota Energy Resources Corporation,  
and Xcel Energy

Response Due: 30 business days

Analyst Requesting Information: Marc Fournier

Type of Inquiry:

|                          |                 |                          |                |                                     |              |
|--------------------------|-----------------|--------------------------|----------------|-------------------------------------|--------------|
| <input type="checkbox"/> | Financial       | <input type="checkbox"/> | Rate of Return | <input type="checkbox"/>            | Rate Design  |
| <input type="checkbox"/> | Engineering     | <input type="checkbox"/> | Forecasting    | <input type="checkbox"/>            | Conservation |
| <input type="checkbox"/> | Cost of Service | <input type="checkbox"/> | CIP            | <input checked="" type="checkbox"/> | Other:       |

**Request Number** | **If you feel your responses are proprietary, please indicate.**

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.

## **MERC Response**

MERC believes there would be limited value in the data and reports referenced in parts (a) – (c) above or any other PHMSA and MnOPS reports as referenced in PUC #2 in terms of enhancing the Commission’s evaluation of MERC’s level of service quality. The data provided in these reports reflect a snapshot in time and are dependent on a large number of continually changing dynamics, many of which are beyond the Company’s control and would not provide any insight into MERC’s quality of service.

For example, leaks eliminated or repaired that are not an indication of material issues (e.g. natural forces, other outside forces, and excavation) could continue to happen regardless of the Company’s ongoing integrity management programs and additional reporting requirements to the Commission would not enhance the Commission’s evaluation of the company’s level of service quality.

Additionally, if or when MERC receives any emergency response violations or violation letters, the Company reviews and implement training on lessons learned to the operations staff. Simply reporting on any violations received would not change MERC’s approach to any violations, and MERC does not believe the Commission’s evaluation of the Company’s service quality would be enhanced by the review of such information.

Finally, MERC is already subject to many regulatory requirements and oversight in relation to the design, installation, maintenance, and operations of our pipeline facilities by PHMSA and MNOPS. These requirements include, but are not limited to Distribution Integrity Management and Transmission Integrity Management, which require us to evaluate our systems, and continually work at improving the safety and reliability of our system. MERC continues to follow industry best practices by voluntarily participating in implementing a Pipeline Safety Management System to further enhance employee, public, and pipeline safety.

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| 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 |

## **MERC Response**

Please see MERC's response to PUC Request 1.

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

## **MERC Response**

MERC's standard procedure is to offer eight hour customer service windows. In the event a customer requests a shorter window, MERC is often able to accommodate a 4 hour window. In the Company's experience, it is more important to customer satisfaction that the Company's representatives show up within the time period provided than that the time window be shorter.

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| Request Number |   |
|----------------|---|
| 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). |
|                |   |



## **MERC Response**

The length of the window balances our various requirements within our service territory which encompasses a substantial geographical footprint. MERC has found that the eight and four hour windows as discussed in MERC's response to PUC Information Request 3, generally meet customer needs. MERC has discussed the potential of a shorter window, but due to MERC's disperse service territory and the need to prioritize gas emergencies, MERC believes that a two hour window would result in reduced customer satisfaction. Additionally, MERC is currently piloting a call ahead feature, and will measure its effectiveness through customer surveys.

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| 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? |
|                |  |

## **MERC Response**

As noted in response to PUC Information Request No. 3, upon customer request, MERC can frequently accommodate a shorter (4 hour) service window.

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| <input type="checkbox"/> | Cost of Service | <input type="checkbox"/> | CIP            | <input checked="" type="checkbox"/> | Other:       |

| Request Number |  |
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| 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? |
|                |  |

## **MERC Response**

As noted in response to PUC Information Request No. 3, upon customer request, MERC can frequently accommodate a shorter (4 hour) service window. Additionally, please see MERC's response to PUC Information Request 4 for additional discussion on why a shorter window is not offered.