

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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In the Matter of the Annual Service Quality Report
for Minnesota Energy Resources Corporation for 2010

ISSUE DATE: March 6, 2012

DOCKET NO. G-007,011/M-10-374

In the Matter of the 2010 Service Quality Report for
CenterPoint Energy Resources Corporation, d/b/a
CenterPoint Energy Minnesota Gas

DOCKET NO. G-008/M-10-378

DOCKET NO. G-022/M-11-356

In the Matter of Greater Minnesota Gas, Inc.'s Annual
Gas Service Quality Report for 2010

DOCKET NO. G-002/M-11-360

In the Matter of the Annual Natural Gas Service Quality
Report for 2010 for Northern States Power Company, a
Minnesota Corporation

DOCKET NO. G-001/M-11-361

DOCKET NO. G-004/M-11-363

In the Matter of Interstate Power and Light Company's
2010 Annual Gas Service Quality Report

ORDER ACCEPTING REPORTS
AND SETTING FURTHER
REQUIREMENTS

In the Matter of Great Plains Natural Gas Company's
2010 Annual Gas Service Quality Report

PROCEDURAL HISTORY

Between April 25 and May 2, 2011, the following gas utilities were required to file and did file their 2010 annual service quality reports: Greater Minnesota Gas, CenterPoint Energy (CenterPoint), Northern States Power Company d/b/a Xcel Energy (Xcel), Interstate Power and Light Company (Interstate), Minnesota Energy Resources Corporation (MERC), and Great Plains Natural Gas Company (Great Plains).

Between September 26 and December 20, 2011, the Department of Commerce filed comments recommending that the Commission accept all the reports and requesting that each of the utilities file supplemental information. Reply comments were filed in response to the Department's request by all the utilities except Greater Minnesota Gas.

On February 2, 2012, the reports came before the Commission.

FINDINGS AND CONCLUSIONS

I. Background

On August 26, 2010, the Commission established service quality reporting requirements in Docket No. G-999/CI-09-409 for natural gas utilities.¹ The requirements are modeled after the electric utility standards contained in Minn. Rules, Chapter 7826.

The reporting requirements address the following categories: call center response times; meter reading performance; involuntary service disconnections; service extension request response times; customer deposits; customer complaints; telephone answer times to gas emergency line calls; mislocates; damaged gas lines; service interruptions; notification of reportable incidents; gas emergency response times; and customer-service related operations and maintenance expenses.

The utilities are required to submit their annual service quality reports by May 1 of each year.

II. The Annual Reports

The Department reviewed the annual reports filed by each of the utilities and recommended that the Commission accept the reports and that the utilities file supplemental information to address specific aspects of their reports. All the utilities, except Greater Minnesota Gas, responded to the Department's request for additional information.²

The Commission appreciates the Department's careful analysis of each utility's filing and the progress of the gas utilities in compiling data for their first annual reports in a manner that facilitates a clearer account of their service quality levels. The Commission will therefore accept the utilities' 2010 reports.³

The Commission also concurs with the Department and the utilities, who agreed at the Commission meeting that making adjustments to the reporting requirements would be appropriate and that an ongoing discussion among the parties on how to increase uniformity in future reporting would be useful. The Commission recognizes that applying the insights gained from these first filings to future filings increases the clarity of the filings and enhances the value of the reporting process. The Commission also recognizes that providing the parties an opportunity to work together on process improvements will aid the Commission in its evaluation and review of the annual filings. The Commission will therefore set additional reporting requirements and direct the parties to convene a workgroup, as described in further detail below.

¹ The requirements were established for CenterPoint Energy, Northern States Power Company d/b/a Xcel Energy, Minnesota Energy Resources Corporation, and Interstate Power and Light Company. On January 18, 2011, the Commission established similar reporting requirements for Great Plains Natural Gas Company and Greater Minnesota Gas, Inc.

² The Department had asked Greater Minnesota Gas to address whether its 2010 monthly disconnection figures are comparable to previous years and whether the month-to-month changes in disconnections are similar to those in previous years; the Commission will therefore direct Greater Minnesota Gas to respond to the Department's request.

³ The Commission will also accept MERC's telemetering report, which was required by the Commission in its *Order Setting Reporting Requirements* on August 26, 2010 in Docket No. G- 999/CI-09-409.

Finally, the Commission will require that certain clarifications be made to the utilities' 2010 reports and will require the utilities to file additional information, as set forth in the ordering paragraphs below.

III. Future Reporting Requirements

The parties reached agreement that the following additional information should be filed; the Commission will therefore direct the utilities to implement these requirements as set forth below.

Call Center Telephone Response Time

- Require Interstate, in its 2011 annual report, to explain how it calculated its 2011 "percentage of calls answered within 20 seconds."

Customer Complaints

- Request that CenterPoint clarify in its 2011 annual report what is included in the following four customer complaint categories: disconnect for non-payment; service order scheduling; inadequate service; and AMB/BBP issue. CenterPoint should also address how these categories correspond with the categories contained in Minn. Rules, part 7826.2000 (B).
- Request that Xcel explain in its 2011 annual report how its gas-related call center complaints correspond with the complaint categories contained in Minn. Rules, part 7826.2000.

Meter Reading Performance

- Require the utilities to 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.

Service Extension Request Response Times

- Require the utilities to 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 previously served.

Customer Deposits

- Require the utilities to 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 reported number of "required customer deposits."

Gas Service Interruptions

- Require MERC to report, beginning with the Company's 2011 annual report, the number of customers - in addition to the number of service interruptions - whose service was interrupted and the average duration of the interruptions.

- Require Interstate and Great Plains to report, beginning with their 2011 annual reports, all gas service interruptions on their systems (not only those service interruptions immediately reportable to the Minnesota Office of Pipeline Safety).

Gas Emergency Response Times

- Require MERC to report, beginning with the Company's 2011 annual report, gas emergency response times by region (geographic district).
- Require the utilities to 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). Require the utilities to provide an explanation of any difference between the reports provided to the Commission and to MOPS.

IV. Work Group

At the Commission meeting, Xcel Energy proposed convening a workgroup consisting of the gas utilities and the Department to work on improving consistency in annual reporting. Xcel stated that the focus of the workgroup would be to identify methods for increasing uniformity in reporting among the gas utilities, making the annual comparisons of data for each utility easier, as well as more useful in assessing the reports and in setting any future reporting requirements.

In addition, the parties also agreed that the following issues be taken up for further discussion by the workgroup. The Commission will therefore direct the parties to convene a workgroup and to specifically address the following issues as part of their discussions.

Customer Complaints

- Whether MERC should be required, in future annual reports, to further categorize the complaints included in the category "my bill is too high" (in its 2010 report, MERC reported that 70% of its complaints were included in this category).
- How MERC, in future annual reports, should report on escalated, informal complaints, including those received by the Commission's Consumer Affairs Office (in its 2010 report, MERC did not categorize these complaints by type and how long they took to resolve).
- How Xcel, in future annual reports, should report on call center complaint resolution timeframes (Xcel did not include this information in its 2010 report).
- Whether utilities should be required to file copies of their annual customer service reports (required under Minn. Rules, part 7820.0500), whether those requirements overlap with the information provided in the annual gas service quality reports, and how these requirements compare and are reconciled.

Meter Reading Performance

- Whether the utilities' data on the number of unread meters and unexplained meter readings is consistent with the utilities' data on the number of estimated billings under Minn. Rules, part 7820.3400.

- Development of a more accurate and comparable method of reporting meter reading staffing levels and whether it is relevant for meter-reading staffing levels to be reported by work center or geographical area.

Involuntary Service Disconnections

- Whether to require utilities to include in their annual service quality reports copies of the information they submit under Minn. Stat. §§ 216B.091 and 216B.096 (and/or summaries of this information), and if so, in what format.

Service Extension Request Response Times

- Whether utilities should be required to report the number of requests for service to previously served locations and the time required to complete these requests, and
- Whether to exclude from the gas service quality reports the number of reconnections and restoration of service requests that were processed after a meter was locked for non-payment of a bill and which are also reported under Minn. Stat. §§ 216B.091 and 216B.096.

Mislocates

- Whether to require MERC, Xcel, Interstate, and Great Plains to provide the same level of underlying detail on the total number of mislocates (the number of mismarked lines and the number of failures to mark a line) that CenterPoint provided in its 2010 report.

Gas System Damage

- Whether to require Interstate to report in future annual reports its gas damage data by month.
- Whether to require Great Plains and Greater Minnesota Gas to include in future annual reports data on the type of party (third-party contractor, utility personnel, customer) who caused each particular damage event.
- How the utilities account for lost gas when there is an incident of any kind that results in lost gas; who pays for the lost gas and who pays for the cost of repairing damaged lines when the damage is not caused by the company or its contractor, as well as when the damage *is* caused by the company.

Gas Service Interruptions

- Whether Xcel should continue providing gas service interruption information in the five categories used for October through December 2010.
- Whether Xcel should be required to summarize its gas service interruption data using the two categories of gas service interruption as required and used by the other companies. These two categories are: (1) customer outages due to Xcel employee or Xcel contractor and (2) customer outages due to any other unplanned cause. Or whether this information should be reconciled with the more detailed, five-category reporting method Xcel currently uses.

Call Center Telephone Response Time – Calls Regarding Service Interruptions

- Whether to require Xcel to include in its future annual service quality reports the number of gas emergency calls in addition to the average answer time for these calls.
- Whether to require the gas utilities to include in their annual reports their goals (internal performance metric) for answering gas emergency calls in terms of the “percentage of calls answered within XX seconds.”

Gas Emergency Response Times

- Whether to require Great Plains to provide, in future annual reports, an average response time calculation for all gas emergency responses.
- Whether to require the gas utilities to provide, in future annual reports, complete and non-redacted copies of their MOPS Emergency Response Reporting Forms.
- Whether to require the gas utilities to provide, in future annual reports, reconciliations between the gas emergency response numbers reported in their annual service quality reports and the numbers reported to MOPS in the MOPS Emergency Response Reporting Forms, and
- Consider input from the Department on review of those reconciliations, including whether the utilities are accurately reporting their gas emergency response times and reporting data using the correct gas emergency response time metric.

ORDER

1. The Commission hereby accepts the 2010 natural gas utilities’ service quality reports.
2. In future annual reports, utilities shall include data on their average speed-of-answering calls, in addition to reporting on the percentage of calls answered within 20 seconds or less.
3. The Commission hereby accepts MERC’s telemetering implementation report.
4. Greater Minnesota Gas shall promptly respond to the Department’s request for information to address whether its 2010 monthly disconnection figures are comparable to previous years and whether the month-to-month changes in disconnections are similar to those in previous years.
5. Beginning with its 2011 annual report, Interstate shall provide the number of locate requests.
6. CenterPoint and MERC shall submit a compliance filing on whether the miles of pipe the companies reported in operation as of December 31, 2008 and 2009, and as reported in their annual 2010 reports, are accurate.
7. Beginning with their 2011 annual reports, Interstate, Great Plains, and Greater Minnesota Gas shall provide the number of miles of pipe they operate in Minnesota.

8. MERC shall file a response explaining why its revised attachment J spreadsheet does not include changes to its original filing.
9. The utilities shall work with the Department and Commission staff on an ongoing basis to develop more accurate and complete service quality reports.
10. The gas utilities shall comply with the filing requirements described herein.
11. The parties shall convene a workgroup to work on improving consistency in reporting and to address the issues described herein.
12. This Order shall become effective immediately.

BY ORDER OF THE COMMISSION

Burl W. Haar
Executive Secretary



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