

December 19, 2013

Burl W. Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
Saint Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. G001/M-13-324

Dear Dr. Haar:

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

2012 *Annual Service Quality Report* (Report) submitted by Interstate Power and Light Company, an Alliant Energy Company (Interstate or Company).

The 2012 *Annual Service Quality Report* was filed on May 1, 2013 by:

Kent Ragsdale  
Managing Attorney--Regulatory  
Interstate Power and Light Company  
200 First Street SE  
Cedar Rapids, Iowa 52406-0351

Based on its review of Interstate's 2012 Annual Service Quality Report, the Department recommends that the Commission accept the Company's Report, pending submittal of additional information in reply comments.

The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ ANGELA BYRNE  
Financial Analyst  
651-539-1820

AB/lt  
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE  
MINNESOTA DEPARTMENT OF COMMERCE  
DIVISION OF ENERGY RESOURCES

DOCKET NO. G001/M-13-324

**I. BACKGROUND**

On April 16, 2009, the Minnesota Public Utilities Commission (Commission) opened an investigation into natural gas service quality standards in Docket No. G999/CI-09-409. In its August 26, 2010 *Order* (09-409 *Order*), the Commission established uniform reporting requirements for all regulated Minnesota gas utilities. The 09-409 *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, an Alliant Company, (Interstate or the Company) was allowed to report commingled gas and electric statistics for answer times from its utility call centers, meter reads, and mislocates. For the first year, the Company also was allowed to report only as much data as possible from 2010 for service extension request response time. For events reportable to the Minnesota Office of Pipeline Safety (MOPS), all utilities were ordered to notify the Commission and the Minnesota Department of Commerce (Department) contemporaneously with their notice to MOPS.

In addition to the requirements in the 09-409 *Order*, the Commission's March 6, 2012 Order (11-361 *Order*) in Docket No. G001/M-11-361, *et al*, 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, 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;

- 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”; 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 the Commission and to MOPS.

In the 11-361 *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;
- 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 11-361 *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.<sup>2</sup> 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 11-361 *Order*.

On May 1, 2013, Interstate filed its calendar year 2012 *Annual Service Quality Report* (Report) to comply with the 09-409 *Order* and the 11-361 *Order*.<sup>3</sup> The Department provides its summary and analysis of Interstate’s Report below.

## II. THE DEPARTMENT’S ANALYSIS

In the 09-409 *Order*, the Commission requested that each Minnesota regulated utility provide information on various service quality related reporting metrics. The Department notes that for some metrics, Interstate did not have full calendar year 2010 data. The 09-409 *Order* acknowledged that the Company would not have data for all months of 2010 for all metrics and directed that the Company report as much information as possible in these cases. In the 11-361 *Order*, the Commission requested additional information from all of the utilities to increase the clarity and usability of the previously ordered service quality metrics. The Department addresses each of these reporting metrics below.

---

<sup>1</sup> Participating parties included Xcel Energy, CenterPoint Energy, Minnesota Energy Resources Corporation, Great Plains Natural Gas Company, Interstate Power and Light, and the Department.

<sup>2</sup> See Attachment 1 for a matrix summarizing each utility’s reporting content for each metric.

<sup>3</sup> The 2012 filing in Docket No. G001/M-12-411 is pending Commission consideration.

A. *CALL CENTER RESPONSE TIME*

Interstate reported the percentage of calls answered within 20 seconds in both tabular and graphical detail. As the 09-409 *Order* permitted, Interstate reported this metric on a combined gas and electric basis. For 2012, the Company reported that it met its internal annual goal 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. Per the 11-361 *Order*, Interstate reported that its average speed of answer was 12.3 seconds.

The Department acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-361 *Orders*.

B. *METER READING PERFORMANCE*

Interstate reported the following metrics for combined gas and electric meter-reading performance on pages 2 and 3 of Appendix A in its Report:

- A. the number and percentage of customer meters read by Company personnel;
- B. the number and percentage of customer meters self-read by customers;
- C. the number and percentage of customer meters that have not been read by Company personnel for periods of six to 12 months and for periods of longer than 12 months, and an explanation as to why they have not been read; and
- D. data on Company monthly meter-reading staffing levels, by work center or geographical area.

Interstate reported that an annual average of 92.7 percent of customer meters were read by utility personnel and 0.02 percent were read by the customer in 2012. In each month except for December, 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 11-361 *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. Table 1 summarizes the number of meters not read by utility personnel for longer than 12 months according to Interstate's current and past annual reports.

**Table 1: 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 Department acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-361 *Orders*.

**C. INVOLUNTARY SERVICE DISCONNECTIONS**

The Company referenced the involuntary disconnections data that it reported under Minn. Stat. §216B.091 and §216B.096 in Docket No. E,G999/PR-12-02. Interstate also included a summary of its monthly Cold Weather Rule reports on pages four through six of Appendix A in its Report. Table 2 summarizes customer disconnection statistics reported by the Company in its Cold Weather Rule reports.<sup>4</sup>

**Table 2: Involuntary Disconnection Information**

	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

\*Residential customers only

The Department notes that the information in Table 2 above does not reconcile with the involuntary disconnection information contained in its companion report filed in Docket No. E001/M-13-249. The Department requests that Interstate provide reconciliation in its reply comments.

The Department acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-361 *Orders*.

<sup>4</sup> Docket Nos. E,G999/PR-10-02; E,G999/PR-11-02; and E,G999/PR-12-02.

*D. SERVICE EXTENSION REQUESTS*

In its 09-409 *Order*, the Commission required that each utility provide in its annual report information on service extension requests in the same manner as detailed in Minnesota Rule 7826.1600, items A and B, except for information already provided in Minnesota Statute sections 216B.091 and 216B.096, subd. 11. The Company provided, as an attachment to its Report, the service extension request data per Minnesota Rules. 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 stated that it excluded reconnects for credit/nonpayment issues. The Company also stated that it does not track response time by account; 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.

The Department acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-361 *Orders*.

*E. CUSTOMER DEPOSITS*

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 11-361 *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 Department acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-361 *Orders*.

*F. CUSTOMER COMPLAINTS*

Interstate reported the following metrics for combined gas and electric customer complaints on pages 9 through 17 of Appendix A in its Report:

- A. the number of complaints received;
- B. the number and percentage of complaints alleging billing errors, inaccurate metering, wrongful disconnection, high bills, inadequate service, and the number involving service-extension intervals, service-restoration intervals, and any other identifiable subject matter involved in five percent or more of customer complaints;

- C. the number and percentage of complaints resolved upon initial inquiry, within ten days, and longer than ten days;
- D. the number and percentage of all complaints resolved by taking any of the following actions:
  - (1) taking the action the customer requested;
  - (2) taking an action the customer and the utility agree is an acceptable compromise;
  - (3) providing the customer with information that demonstrates that the situation complained of is not reasonably within the control of the utility; or
  - (4) refusing to take the action the customer requested; and
- E. the number of complaints forwarded to the utility by the Commission's Consumer Affairs Office for further investigation and action.

Interstate reported that it received 349 electric and natural gas complaints in 2012, three 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 complaints were resolved by taking the action the customer requested. These statistics represent an improvement in total complaints reported, and a slight decline in complaints resolved by taking action the customer requested (56 percent) compared to 2011 (59 percent) and 2010 (60 percent).

The Department acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-361 *Orders*.

*G. EMERGENCY LINE RESPONSE TIME*

Interstate reported its average speed of answering all emergency calls, for natural gas and electric, by month as required in the 09-409 *Order*. The Company also reported the same information for calls to its direct emergency phone line. 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 Department appreciates Interstate's efforts to improve this area of service quality.

The Department acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-361 *Orders*.

#### *H. MISLOCATES*

The 09-409 *Order* required Minnesota gas utilities to provide data on mislocates, including the number of times a line is damaged due to a mismarked line or failure to mark a line. Through its participation in the workgroup, Interstate agreed to distinguish between mismarked and unmarked mislocates. 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 Department acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-361 *Orders*.

#### *I. DAMAGED GAS LINES*

The 09-409 *Order* required Minnesota gas utilities to provide data on damaged gas lines, including the number of lines damaged by Company employees or contractors, the total number of other damage events, and the number of events that were unplanned in nature. Through its participation in the workgroup, Interstate agreed to provide this information by month.

Interstate reported 15 incidents of gas system damage in 2012, none of which were caused by Interstate employees or contractors working on the Company's behalf. This calculates to a rate of 6.33 incidents per 100 miles of main.<sup>5</sup> The months during which the most damage incidents occurred were July, September and November, with three incidents occurring each month.

The Department acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-361 *Orders*.

#### *J. SERVICE INTERRUPTIONS*

The 09-409 *Order* required that Minnesota regulated gas utilities collect data regarding service interruptions, separating the data into categories based on whether the event was caused by Company employees or Company contractors, or some other unplanned caused. 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 Sub-Section I above, 12 resulted in gas outages to at least one customer, and only three events met MOPS reporting criteria. These instances reported to MOPS are discussed in greater detail in Sub-Section K of these *Comments*.

The Department acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-361 *Orders*.

---

<sup>5</sup> Per the 11-361 *Order*, Interstate reported that, as of December 31, 2012, it operated 237 miles of main and 10,326 service lines.



*K. MOPS SUMMARIES*

The Company is required to summarize major events that require a report being made to the MOPS. These summaries include the ten items that the MOPS requires in its incident reports. They are:

- 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.

Interstate reported three such major events during 2012. The Company provided summaries for these incidents, which included the required information listed above. The Department notes that according to Interstate, customers affected by these interruptions were restored the same day.

The Department acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-361 *Orders*.

*L. EMERGENCY RESPONSE TIME*

The 09-409 *Order* required that Minnesota regulated gas utilities collect and provide data regarding gas emergency response times including a percentage breakdown of the number of calls responded to in less than an hour and the percent of calls responded to in more than an hour. In addition, the Commission required Interstate to report the average number of minutes it takes to respond to an emergency on a monthly basis. The Company provided this information in the body of its report.

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 11-361 *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 non-redacted copies of their MOPS Emergency Response Reporting Forms; Interstate provided copies for calendar year 2012.

The Department acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-361 *Orders*.

**M. OPERATIONS AND MAINTENANCE (O&M) EXPENSES**

Along with the service quality data referenced above, the Commission also required Minnesota gas utilities to report operation and maintenance (O&M) expenses related to customer service in the Federal Energy Regulatory Commission (FERC) 901 and 903 accounts. In 2012, Interstate reported total service quality related O&M expenses of \$113,869, which translates into approximately \$9,489 of O&M expenses per month. Interstate also noted that these O&M expense figures include payroll taxes and benefits.

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

**III. THE DEPARTMENT'S RECOMMENDATIONS**

Pending Interstate submitting a reconciliation of the involuntary disconnection data the Company filed in its gas and electric service quality reports, the Department recommends that the Commission accept the Company's filing in fulfillment of the Commission's *Order Setting Reporting Requirements* issued August 26, 2010 in Docket No. G999/CI-09-409, and the Commission's *Order Accepting Reports and Setting Further Requirements* issued March 6, 2012 in Docket No. G001/M-11-361.

/lt

**AGENDA**  
**Natural Gas Service Quality**  
**Utility Stakeholder Group**

*Meeting date: June 22, 2012*

**Follow-up Actions**

*(Provide identified information/ responses to Xcel Energy)*

<b>Who</b>	<b>What</b>	<b>When</b>
<b>All Utilities</b>	Provide to-date SQ Dockets	Jun 29
	<u>Service Interrupts &amp; Integrity Events:</u> Define calculations for Average Outage Time and Total Outage Time	Jul 13
	Define call types included in MnOps Reports	Jul 13
	Highlight any differences between MnOps Reports and MPUC reported items	Jul 13
	Assess whether can follow the Mislocate criteria provided by CPE (see below)	Jul 13
	Provide description of what is being reported in the Complaint numbers.	Jul 13
<b>CPE</b>	Provide Summary of Cold Weather Rule reporting of involuntary service disconnects	Jun 29
	Provide criteria for when require a Deposit	Jul 13
	Are “special”/ “rebill” reads included in reported Actual and Estimated meter read numbers?	Jul 13
	Provide to attendees, criteria for Mislocate classification	Jun 29
	Include IVR calls in Telephone Response metrics?	Jul 13
<b>IPL</b>	Are “special”/ “rebill” reads included in reported Actual and Estimated meter read numbers?	Jul 13
	<u>Service Connect/Reconnect</u> Separate out credit-related reconnects to report just non-credit-related? If not, include the # of disconnects as a way to approximate just non-credit-related disconnects.	Jul 13
	Separate out the electric Mislocates to get gas-only?	Jul 13
<b>MERC</b>	Include IVR calls in Telephone Response metrics?	Jul 13
<b>GP</b>	<u>Service Connect/Reconnect</u> Separate out credit-related reconnects to report just non-credit-related? If not, include the # of disconnects as a way to approximate just non-credit-related disconnects.	Jul 13

*XE will turn around an updated Matrix that includes all of the above information for review by the utilities by July 30, 2012, with a workgroup goal to have the Matrix finalized by September 1, 2012.*

**AGENDA**  
**Natural Gas Service Quality**  
**Utility Stakeholder Group**

**Recommendations/Decisions**

- The workgroup output will be a completed all-utility matrix of the “current state” reporting that additionally includes:
  - Metric reporting definitions;
  - Any go-forward reporting modifications that will achieve or improve reporting consistency across the utilities; and,
  - The effective date of noted reporting changes.

**In Go-Forward Annual Reports:**

- Include the May 1 Compliant report that is required by Minn. R. 7820.0500.
- Meter Reading Staffing Levels:
  - Report by geographic location;
  - Include text re; whether Meter Readers have other/non-meter reading responsibilities; and,
  - Indicate whether AMR is deployed in each reported area.
- Involuntary Service Disconnects: Include a summary modeled after the 2011 CPE summary of Cold Weather Rule reports.
- Lost Gas: Include a statement that provides a “tie” to the lost gas related to system damages issue that is going on in the AAA Docket(s).
- Provide MnOps event reports.
- Provide a summary of contemporaneously-reported events/incidents, rather than the actual email notifications sent at the time of the event.

We also determined that there is no Department action necessary to reconcile MnOps reports to other gas emergency information, because all utilities are providing MnOps reports. XE also provides gas emergency response information as reported under its Quality of Service Plan tariff, but this is considered “additional” reporting that merely provides an alternative view of its emergency response.

Natural Gas Service Quality Reporting Workgroup  
Reporting Summary and Changes

	Xcel Energy	CPE	MERC	IPL	GP
<b>Call Center Answer Times</b>	<p>Change: None. Already include IVR and billing calls.</p> <p>Our report includes E&amp;G residential calls to our call center representatives, business solutions center calls to our reprs, credit calls, and IVR handled outage and billing calls. We report monthly volume and percentages based on the 80/20 Rule. We report calls 24/7.</p>	<p>Change: E&amp;G with 2012 report, will add Service Level with IVR to Schedule 1.</p> <p>Schedule 1: The percent of calls answered within 20 seconds or less during stated business hours, the average speed of answer and the total number of calls answered. Includes utility call center, emergency calls, and business customer hotline. ASA and total number of calls answered are reported as required in Docket G008/GR-04-901. Excludes calls that only utilized IVR functionality.</p>	<p>Change: E&amp;G with 2012 report, will add IVR calls to the telephone response information.</p> <p>Our report includes monthly information for calls taken Monday through Friday, 8-5. The report includes average speed of answer and % of calls answered in 20 seconds or less. We also provide the similar information for calls coming into our emergency lines with the exception of the % answered in 15 seconds or less and in all calls taking 24/7. Does not include IVR calls.</p>	<p>Change: None. Already include IVR and all calls.</p> <p>Percentage of calls answered within 20 seconds, including both gas and electric data. Includes all calls 24/7, including IVR.</p>	<p>Change: None. Already include IVR calls.</p> <p>Total calls answered, percentage of calls answered in 20 seconds or less, and the average speed of answer. Includes calls during business hours (7 am to 7 pm) and includes IVR calls.</p>
Able to include IVR calls in Telephone Response Metrics	<p>We do include IVR handled outage and billing calls</p>	<p>We will add SL with the IVR included for Bill/Credit/Move (CIC - Residential) reporting to Schedule 1 beginning with January 2012.</p>	<p>MERC is able to include the number of IVR calls in the telephone response information.</p>	<p>Will continue to include</p>	<p>Will continue to include.</p>
<b>Customer Deposits</b>	N/A	N/A	N/A	N/A	N/A
Please describe how/what you report	<p>Our reported deposits are from residential customers that have filed for bankruptcy (both E&amp;G)</p>	<p>Schedule 5: The number of move orders and the number and percentage of deposits required as a condition of service. Including deposits required for reconnection of service after disconnection due to credit issues.</p>	<p>Our report includes any deposits collected for the reporting year. We only collect from customers caught diverting ( theft) service.</p>	<p>Deposit data is for new and reconnecting customers, consisting of both gas and electric data.</p>	<p>Deposits required as a condition for receiving new service.</p>
<b>Customer Complaints</b>	<p>Change: E&amp;G with 2012 report, submit May 1 Complaint report.</p> <p>Customer advocate group- we report all complaints, source of complaint, type, and action we took and time to resolve- by month Call center- all calls that come into call center by customer type, complaint type, and action we took. By month-- both E&amp;G</p>	<p>Change: None. Already include the May 1 Complaint report.</p> <p>Schedule 6: Number of recorded residential and commercial complaints, reason/type of complaint, action taken, time to resolve complaint and number of complaints received forwarded by outside agencies.</p>	<p>Change: None. Already includes the May 1 Complaint report.</p> <p>Our report categorizes complaints by the following types, employee action/behavior, billing/meter reading issue, collection/disconnection issue, service quality, meter adjustment, outage, high bill. We then report time to resolve. This is broken into 3 categories, initially, within 10 days and &gt; 10 days. We then report report complaint resolution by the following, using actions assistance of resolution by the following, using actions assistance of the utility and service center request. We then include the # of PUC complaints. This is all reported on a monthly basis.</p>	<p>Change: E&amp;G with 2012 report, will include the May 1 Complaint Report.</p> <p>All customer complaints are tabulated. Data includes both gas and electric complaints.</p>	<p>Change: E&amp;G with 2012 report, will include the May 1 Complaint Report. E&amp;G with 2013 report, will include all calls received in the customer service center summarized by call type.</p> <p>Customer complaints that are escalated to a supervisor response. Complaints are reported by type, resolution timeframe, resolution type, and number forwarded by the MN CAO.</p>

Natural Gas Service Quality Reporting Workgroup  
Reporting Summary and Changes

Xcel Energy	CPE	MERC	IPL	GP
<p>Customer advocate group- we report all complaints, source of complaint, type, and action we took and time to resolve- by month</p> <p>Call center- we report specific call codes that we previously determined could be indicative of a complaint, this ends up being the majority of calls- we then report this call center calls by customer type, call type, and action we took. By month- both D&amp;O</p>	<p>AMB/BBP Issue: Any Budget Billing issue, do not understand, too high or too low, question how calculated</p> <p>Billing Errors: Bill print issues, adopted contract account errors, Landlord Agreement error</p> <p>Construction &amp; Maintenance: Excess footage fees, out of season changes, frost burners, cost to add, change, ice shields, barriers, atmospheric corrosion inspection (ALC)</p> <p>Credit Arrangements: GAP, Cannot afford/cannot pay, reasonably on time, delinquent arrangement, CVR arrangement, reconnect quote</p> <p>Disconnect Non-Pay: GUI M, Wrongful Disconnect, thought had arrangements, did not receive notice, disconnected during CVR, reconnect fees, payment methods, scheduling requirements</p> <p>Disputed Charges: Any dispute not involving an account currently in write off, Escrow, Investigation Bad Debt, landlord/tenant disputes, foreclosures, divorce, roommate situations, disputed debt transfer, basic fee on inactive meter, dates of service (move in or out)</p> <p>Employee: CSR Error, Employee Misconduct</p>	<p>MERC reports all calls which the call center CSR believes to be a complaint. MERC has trained the CSRs to record all complaints through an automated process. When the CSR first looks at any account there is a pop up window which asks if the call is a complaint. This question must be answered before the CSR moves on. MERC reports the total number of complaints, breaks down the complaints by 7 different types, this breakdown is given by total number and percentage of total complaints. MERC provides the total numbers that are resolved initially, within 10 days and greater than 10 days. Complaint resolution is reported by total number and percentage. The resolution categories include: pending, within 48 hours, resolved, agreed, not resolved, not requested, action. This report also indicates the number of PLC complaints. This is informational only as these complaints are included in the reported complaint numbers.</p>	<p>Billing Errors - All billing complaints except high bills, low bills, zero usage/ consumption, adjusted bills.</p> <ul style="list-style-type: none"> <li>Inaccurate Metering - Field/engineering/construction/maintenance issues, meter reading issues.</li> <li>Wrongful Disconnection - Turn-off or disconnect error, collections issues.</li> <li>High Bills - High bills due to usage or weather, billing issues.</li> <li>Inadequate Service - Customer service issues such as poor service, long waits, delayed responses, lack of follow-up.</li> <li>New Service Connection Intervals - New service issues relating to bill/engineering/construction/maintenance departments.</li> <li>Service Restoration Intervals - Usage issues relating to bill/engineering/construction/maintenance departments.</li> <li>Payment Status - Late payment, incorrect payment amount, late payment penalty, missing payment, promise to make payment, returned equipment.</li> <li>Turn-off Issues with turn-on order for service, wrong date, not complete, not issues correctly, lack of customer contact.</li> <li>Meter Reading Other- Meter reading issues such as no read/calculate/read cycle, reader access, reader behavior, read more cycle.</li> <li>Payment Arrangement - Payment agreements - short and long-term, new, details, multiple agreements, agreement disputes, promise to pay.</li> <li>Credit &amp; Collections General - Bankruptcy, collection agency/bureau issues, customer assistance programs.</li> <li>Property Damage - Report of damage to customer property/equipment, claims, insurance questions, locates, construction, line clearance, outages, weather.</li> <li>Tree Trimming - Issues with tree trimming - not notified, trimmed too much, trimmed too little, did not like way trimmed, trim cycle.</li> <li>Engineering, Construction, Maintenance Other - No call back, non-emergency safety issue, outages, periodic meter change, planned maintenance/outage, power quality, radio interference, street/security lights.</li> <li>Power Quality &amp; Reliability - Outages, blinks, quality issues.</li> <li>Customer Payment Programs - Programs such as: Automatic Payment, Paperless Billing, Western Union, CheckFree, Budget Billing, Customer Assistance programs.</li> <li>Non-Utully Billing - Bill details, Contribution Tax Adder bill detail, disputes charges, disputes responsibility, finance charges.</li> <li>General Billing Questions/General Other - All other.</li> </ul>	<p>Effective with 2013 report; call codes determined to be indicative of a complaint which is expected to be the majority of all calls will be reported by customer type, call type, and action taken by month.</p>
<p>Provide description of what is being reported in the Complaint numbers.</p>	<p>High Bill: Customer initiated complaint regarding high usage (must be usage related, not simply high balance)</p> <p>Inaccurate Metering: Switched piping, incorrect pressure factor, misread, non-registering meter, ERT/programming, meter change, estimated reads</p> <p>Collections/Inactive/Write-Off: Account sent to collections, any collection agency related complaint</p> <p>Inadequate Service: Failure to accommodate customer expectations; hold times, not following through with promised actions</p> <p>Web/Customer Self-Service/IVR: Online Billing, My Account Online, Password locked, web issues, bill reminders, IVR Spanish option, difficulty navigating</p> <p>Payment Issue: One Time Pay, encoding error, missing payment, incorrect application, processing delay, refund checks, late fee/due date, Energy Assistance payment, Bank Pay issue</p> <p>Rate/Tariffs: Refusal of Service, Interm Rates, franchise fees, taxes, basic charge, delivery charge</p>			

Natural Gas Service Quality Reporting Workgroup  
Reporting Summary and Changes

	Xcel Energy	CPE	MERC	IPL	GP
Provide description of what is being reported in the Complainant numbers (continued).		Security Deposit: Cannot afford, question calculation, not returned, interest Service Order Scheduling: Anything appointment related, wait time, appointment windows, scheduling policies, missed/late appointment Other: Legal Access, Postcard, Claims/Restoration, BP Verification, CIP, Marketing, Vehicle Operation Pipework: Any complain involving transfers part of the Pipework initiative Decoupling/IBR: Any complain pertaining to the Inverted Block Rate (fixed pricing) and/or Decoupling			
Whether MERC should be required, in future annual reports, to further categorize the complaints included in the category "my bill is too high"	N/A	N/A	MERC is willing to look at trying to further categorize these type of complaints. It most cases these are based on various factors such as media reports of low gas costs (why does gas cost me \$7.00/Dth when the media is telling me it's only \$2.00?), weather impact, etc. In most cases it is CIBs taking time to explain what goes into a bill or that the weather wasn't actually as warm as the customer may think.	N/A	N/A
How MERC, in future annual reports, should report on escalated, informal complaints, including those received by the Commission's Consumer Affairs Office	N/A	N/A	MERC believes it is capturing all those complaints.	N/A	N/A
How Xcel, in future annual reports, should report on call center complaint resolution timeframes (Xcel did not include this information in its 2010 report).	The vast majority of our call center complaints/calls are resolved upon their initial inquiry. However, we are looking into capturing the timeframe for the small percent of remaining calls.	N/A	N/A	N/A	N/A
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.	While it seems redundant to file the same report in two different dockets, if it would be helpful to parties, we do not oppose. The reports are different- the annual customer complaint report under 7820.0500 details the numbers resolved/unresolved as well as total customer numbers. The info provided in our SQ reports under 7820.2000 doesn't provide this info, but breaks it down into categories, sources, by month, time resolved, action taken etc.	Schedule 17: Currently including a copy of the report filed, as required in Docket No. G088/GP-04-901.	This seems redundant and hopefully this can be reviewed and determined that the gas service quality fulfills this requirement.	Not a hardship to supply - this is already being done for electric.	Copy of report will be provided.

Natural Gas Service Quality Reporting Workgroup  
Reporting Summary and Changes

	Xcel Energy	CPE	MERC	IPL	GP
<b>Meter Reading</b>	<p>Change: Eff with 2012 report, all utilities will report MR staffing levels by geographic location; whether MRs have other non-MR responsibilities; and whether AMR is deployed in each reported geographic area.</p> <p>Under 7826.1400 we report # and % of meters read by XE and customers by month. We report # and % of unread meters for 6-12 months and 12+ months, by month, and a classification for why they haven't been read for all customer classes. We also reporting staffing levels by work center in accordance with the Rule.</p> <p>We also note that our reported numbers of meters read and estimated under 7826.1400 do not add to 100 percent because the Rule includes only the number of meters estimated for six or more consecutive months. Any meters estimated for a single month up to a total of five months, are not included in the reported numbers.</p> <p>We report both F&amp;G</p>	<p>Change: Eff with 2012 report, will exclude special or rebill meter readings. Also, all utilities will report MR staffing levels by geographic location; whether MRs have other non-MR responsibilities; and whether AMR is deployed in each reported geographic area.</p> <p>Schedule 2: The number of residential, commercial and total number of meters to be read by month, the number of residential, commercial, total and percentage of meters read from actual meter readings by CPE; personnel, the number of residential, commercial total and percentage of meters read by customers, and the meter reading staffing levels for the metro area and greater Minnesota. The number of residential, commercial, total and percentage of meters not read within 6-12 months and greater than 12 months.</p>	<p>Change: Eff with 2012 report, all utilities will report MR staffing levels by geographic location; whether MRs have other non-MR responsibilities; and whether AMR is deployed in each reported geographic area.</p> <p>MERC reports monthly total meters, meters company read and meters estimated or self-reads. MERC is not able to differentiate between an estimate or a self-read. The percentages of company read and self-read is provided along with # and % of meters not read in a 6-12 month period and those not read &gt; 12 months.</p> <p>Comments are also provided as to why meters were not read during those periods. Because of the number of farm tap customers MERC has we report both with and without farm taps included. Farm taps are required by tariff and contract to self-read their meters with the company being required to read them once annually. MERC also provides meter reading staffing levels. MERC does not have dedicated meter readers in all areas of the State. MERC relies on labor reports and provides a FTE estimate based on hours spent reading meters.</p>	<p>Change: Eff with 2012 report, all utilities will report MR staffing levels by geographic location; whether MRs have other non-MR responsibilities; and whether AMR is deployed in each reported geographic area.</p> <p>Meter reading performance by month including both gas and electric data.</p>	<p>Change: Eff with 2012 report, all utilities will report MR staffing levels by geographic location; whether MRs have other non-MR responsibilities; and whether AMR is deployed in each reported geographic area.</p> <p>The number and percentage of meters read by utility personnel, self-read by customers, or estimated. Also the number and percentage of meters not read by utility personnel for periods of 6-12 months and longer than 12 months with description as to why. Also provide meter-reading staffing levels by area.</p>
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 7826.1400.	Yes, we believe we are in compliance with the Rules.	The difference between the total number of meters and the number of meters read by the utility or its customers is the number of estimated meter readings due to an unread meter.	Yes	We include unexplained in our total.	Yes.
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.	We have an integrated meter reading workforce and AMR system. We currently report by work center in compliance with Rule 7826.1400 in our electric SQ report. We support maintaining this work center reporting consistent for both our gas & electric SQ reports.	Reported by geographic area, metro and greater MN.	For informational purposes only, MERC believes this information can be included as currently reported. Comparison from company to company is difficult at best based on geography, AMR, etc.	IPL is meeting its meter reading requirements with current staffing levels and does not feel it would be beneficial or relevant to complicate the reporting method. IPL service territory and customer count is comparatively low, so this would provide minimal comparative value.	Currently reported by geographic area.
Are "special"/"rebill" reads included in reported Actual and Estimated meter read numbers?	No.	On the 2011 report, the cancels and rebills were included in the counts of actual bills and estimated bills. For 2012, special or rebill meter readings will not be included in the reported Actual and Estimated meter read numbers.	No.	Special or rebill meter readings are not included in the reported Actual and Estimated meter read numbers. As a point of reference, IPL only has 58 special bill customers.	No.
<b>Involuntary Service Disconnections</b>	<p>Change: Eff with 2012 report, all utilities will include a summary modeled after the 2011 CPE summary of Cold Weather Rule reports.</p> <p>Consistent with Order point 2D of the 8/26/10 Order Docket No. G999/CI-09-409, we reference the CWR Order in Docket No. G999/CI-09-409, but we do not gas report</p>	Change: None.	Change: Eff with 2012 report, all utilities will include a summary modeled after the 2011 CPE summary of Cold Weather Rule reports.	Change: Eff with 2012 report, IPL will begin separating out the credit-related reconectors. Additionally, all utilities will include a summary modeled after the 2011 CPE summary of Cold Weather Rule reports.	Change: Eff with 2012 report, all utilities will include a summary modeled after the 2011 CPE summary of Cold Weather Rule reports.
Please describe how/what you report	This was addressed in the Commission's August 26, 2010 Order in Docket No. G999/CI-09-409, but we do not oppose providing.	Schedule 3: The month ending Minnesota Cold Rule Compliance Questionnaire in a column format by month with all months reported. (Copy Rec'd).	MERC provides the monthly CWR Compliance Questionnaire that is filed monthly with the Commission.	Included a copy of monthly Cold Weather Rule reports included in appendices.	Number of customers who received disconnection notices # that sought Cold Weather Rule protection, who were granted protection, and whose services were disconnected involuntarily (All data from Cold Weather monthly reports).
Whether to require utilities to include in their annual service quality reports copies of the information they submit under Minn. Stat. §§ 21.0B.091 and 21.0B.096 (and/or summaries of this information), and if so, in what format.	This was addressed in the Commission's August 26, 2010 Order in Docket No. G999/CI-09-409, but we do not oppose providing.	The information is summarized into a monthly matrix rather than including copies of each individual report.	The filings are available so including them is not an issue.	Provided in 2011 report.	Effective with 2012 report, will provide a summary of the monthly Cold Weather reported data.
Separate out credit-related reconectors to report, just non-credit-related? If not, include the # of disconnections as a way to approximate just non-credit-related disconnections.	N/A	N/A	N/A	IPL was able identify that 314 of the 6,704 reconectors reported in the 2011 report were credit related, leaving a total of 6,390 non-credit related service connections.	N/A



Natural Gas Service Quality Reporting Workgroup  
Reporting Summary and Changes

	Xcel Energy	CPE	MERC	IPL	GP
<b>Service Extension Request Response Times</b>	<p>Change: None. Already excludes reconnects for non-payment. Connections to current customers are included in total connections.</p> <p>We report requests to service to new locations- both number of installations and average # of days to complete between request and completion by month. We do not report requests to locations previously served as the only people that we classify in this group are customers who have had their meter locked due to credit. We classify those reconnects for service upgrades or vacancy with our requests for new service- we classify them all together. This report is gas only.</p>	<p>Change: None. Already excludes reconnects for non-payment.</p> <p>Schedule 4: The number of commercial and residential service extensions, the average number of days to complete from the time the property is ready until installation in complete for new service request (properties where prior service did not exist) and Renewed service (properties where service previously existed) excluding locked meters related to credit issues.</p>	<p>Change: None. Already excludes reconnects for non-payment.</p> <p>This report includes monthly information for new service requests for both residential and commercial service installations. It indicates the # of requests and the average time between requested date and installation. The report also includes the same information for requests where an existing service exists and the meter has been turned off for reasons other than non-payment (gas and electric data).</p>	<p>Change: Eff with 2012 report, will exclude reconnects associated with non-payment.</p> <p>Report includes monthly information for new service requests for residential and commercial service installations (gas only data). It indicates the # of requests and the average time between requested date and installation. The report also includes the same information for requests where an existing service exists and the meter has been turned off for reasons other than non-payment (gas and electric data).</p>	<p>Change: None. Already excludes reconnects for non-payment. Connections to current customers are included in total connections.</p> <p>The number of extensions and average days to complete for New Service (locations not previously served) and Renewed Service (locations previously served).</p>
Please describe how/what you report	<p>Aside from those customers who had their meter locked due to credit (which the Commission said not to include in their 8/26/10 Order) We do report this, we have not (and can not) break them out from the new customers- so our reporting combines them all into one group (both new and current customers).</p>	<p>Currently reporting, excluding locked meters related to credit issues.</p>	<p>This does seem like a waste of time. The reports have indicated that the utilities do a good job in getting service initiated in these instances. If delays were occurring on regular basis the Commission would be receiving complaints. I've seen nothing to indicate this has been an issue.</p>	<p>Provided in 2011 report.</p>	<p>GP provided days between receipt of service line application and date meter was installed. We do not have an efficient means of tracking days between requested meter installation date and actual install date. GP supports excluding this data from the reports -- too situational dependent.</p>
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	<p>The Commission's August 26, 2012 Order in Doerfer No. C999/CI-09-409 said to not need to include this, so we have not.</p>	<p>Currently excluding.</p>	<p>Currently excluding.</p>	<p>Will exclude reconnects associated with non-payment.</p>	<p>Currently excluding.</p>
Whether to exclude from the gas service quality reports the number of reconnects 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.	<p>Change: Eff with 2012 report, will follow the mislocate criteria provided by CPE.</p>	<p>Change: None</p>	<p>Change: Eff with 2012 report, will follow the mislocate criteria provided by CPE.</p>	<p>Change: Eff with 2012 report, will separate mismarked v. non-marked lines; will attempt to report mislocates using the CPE criteria; will provide gas-only mislocates.</p>	<p>Change: None. Reported in this fashion for 2011 report.</p>
Mislocates	<p>We define mislocates as a gas line that was damaged as a result of mismarking or failure to mark a line. We divide the number of mislocates by the number of locate tickets to get the mislocate rate.</p>	<p>Schedule 8: The number of mislocates due to mismarked line, failure to mark a line, total number of mislocates, total number of locate tickets and number of mislocates per 1000 locate tickets.</p>	<p>MERC reports monthly total locates, # of mislocates and the % of mislocates. This report would only include those mislocates resulting in damage as MERC has no other consistent means of tracking this information.</p>	<p>Total locate requests for both gas and electric, including number of gas lines damaged due to mismarked or failure to mark.</p>	<p>The number of locate tickets requests received through the MN One Call system and the number of mislocates categorized as either due to a not marked line or a mis-marked line.</p>
Please describe how/what you report	<p>Yes, we can do this. It will be based on whether there was a point or not, which we understand is the same way CPE does it. Beginning in 2012 b/e of a new rule, MNOPS requires reports only for damages that result in a leak- so our service quality reporting will report more than our MNOPS reports.</p>	<p>N/A</p>	<p>With the very low number of mislocates I question the value of this information.</p>	<p>IPL will separate out mismarked vs. not marked in the 2012 report.</p>	<p>GP provided the split between lines not marked and mis-marked lines and will continue to do so.</p>
Whether to require MERC, Xcel, Innesstate, 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.	<p>Yes we can.</p>	<p>Determines whether a line is mismarked or failed to be marked. CPE performs an investigation on all gas damages using post locate pictures taken by the locator to determine whether a line was properly marked or not marked at all. If there are marks/paint in the area of the damage but they are not within the 24 inch tolerance zone CPE determines the root cause of the damage to be a Mismark. If there are no visible marks/paint in the post locate pictures at the site of the damage CPE determines this root cause to be a Failure to Mark.</p>	<p>MERC photographs all line locates prior to excavation. If damage occurs MERC will go back to the locate record (assuming a locate was requested) to verify if the locate was accurate. If it is determined the locate was accurate according to 216D the contractor will be billed. If it is determined MERC or its contractor mislocated the facility the information is then included in the mislocate report portion of the Service Quality report.</p>	<p>IPL can break out the mis-locates and failure to mark items, but will need to investigate further our ability to calculate an error rate as gas and electric locate tickets are not broken out separately. IPL will attempt to report mislocates using the CPE criteria in the 2012 report.</p>	<p>Great Plains investigates each damage to determine who is at fault either company or contractor locator also determine if locates are off or not located at all. Results are documented, but we do not take pictures of locates at this time.</p>
Assess whether can follow the Mislocate criteria provided by CPE	<p>N/A. Only reports mural gas mislocates.</p>	<p>N/A</p>	<p>N/A</p>	<p>In 2011, IPL had five (5) gas "mislocates/lines not marked" that resulted in damage to gas facilities. In 2012 report, will report gas-only mislocates.</p>	<p>N/A</p>
Separate out the electric Mislocates to get gas-only?					

Neutral Gas Service Quality Reporting Workgroup  
Reporting Summary and Changes

	Xcel Energy	CPE	MERC	IPL	GP
<b>Gas System Damage</b>	<p>Change: None. Order Pt. 5 of the Commission's Oct 11, 2012 Order in Docket No. G999/AA-10-885 sets the requirements for reporting the lost gas implications associated with in-fault contractor main strikes.</p> <p>We report gas line damages on a monthly basis classified by whether they were damaged by XE and our contractors or other causes. We then provide our miles of main and the damage calculated per 100 miles of main.</p> <p>N/A</p>	<p>Change: None. Order Pt. 5 of the Commission's Oct 11, 2012 Order in Docket No. G999/AA-10-885 sets the requirements for reporting the lost gas implications associated with in-fault contractor main strikes.</p> <p>Schedule 9; Damages by CPE Employees/Contractors, Damages by others, total damages, miles of pipe, damage per 100 miles of pipe.</p> <p>N/A</p>	<p>Change: None. Order Pt. 5 of the Commission's Oct 11, 2012 Order in Docket No. G999/AA-10-885 sets the requirements for reporting the lost gas implications associated with in-fault contractor main strikes.</p> <p>MERC reports on a monthly basis the total number of gas line damages and whether they were the fault of MERC or its contractors, damaged by others or a system integrity failure.</p> <p>N/A</p>	<p>Change: Eff with 2012 report, will report gas damage by month. Order Pt. 5 of the Commission's Oct 11, 2012 Order in Docket No. G999/AA-10-885 sets the requirements for reporting the lost gas implications associated with in-fault contractor main strikes.</p> <p>Number of gas system damages, including whether the damage was caused by those working on behalf of the utility and also what the damage is attributed to (power equipment, hand digging, streaks, etc)</p> <p>IPL will report gas damage by month in the 2012 report.</p> <p>N/A</p>	<p>Change: Will continue to provide in future annual reports, the detail requested. Order Pt. 5 of the Commission's Oct 11, 2012 Order in Docket No. G999/AA-10-885 sets the requirements for reporting the lost gas implications associated with in-fault contractor main strikes.</p> <p>The number of gas system damages, categorized as to whether the damage was caused by a GP employee/contractor or caused by any other unplanned cause. Also included is miles of pipe and damage per 100 miles of pipe calculation.</p> <p>N/A</p>
Whether to require Interstate to report in future annual reports its gas damage data by month.	N/A	N/A	N/A	N/A	N/A
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.	N/A	N/A	N/A	N/A	GP will provide the detail requested in the 2012 report.
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.	<p>Lost gas reporting set in Docket No. G999/AA-10-885. Amounts received from contractor damage bills are an offset to O&amp;M expenses.</p> <p>Change: None.</p>	<p>Lost gas reporting set in Docket No. G999/AA-10-885. Amounts received from contractors is an offset to O&amp;M expenses.</p> <p>Change: None.</p>	<p>Lost gas reporting set in Docket No. G999/AA-10-885. Amounts received are an offset to O&amp;M expenses.</p> <p>Change: Eff with 2012 report, will provide calculated outage times.</p>	<p>Lost gas reporting set in Docket No. G999/AA-10-885. Amounts received are an offset to O&amp;M expenses.</p> <p>Change: None.</p>	<p>Lost gas reporting set in Docket No. G999/AA-10-885. Amounts received are an offset to O&amp;M expenses.</p> <p>Change: None.</p>
<b>Gas Service Interruptions</b>	<p>We report gas service interruptions on a monthly basis classified by whether they were damaged by XE and our contractors or other causes. Within those categories we indicate the number of homes, the number of incidents, and the average outage time.</p> <p>Already changed in 2011 report</p>	<p>Schedule 10; Report outages due to CPE Employees/Contractors, outages due to others and total outages, and the average duration of this outage. Also provide in Schedule 11 detail of MNOPS reportable events and system integrity events.</p> <p>N/A</p>	<p>MERC provides monthly information of total service interruptions, and whether they were caused by a MERC employee or contractor, others or system integrity. A monthly detailed report is also included indicating the duration of the interruption.</p> <p>N/A</p>	<p>Reported all gas service interruptions, including the numbers of customer affected.</p> <p>N/A</p>	<p>All gas service interruptions, including the number of customers affected and the average duration of the outage, categorized according to whether the interruption was caused by a GP employee/contractor or by any other unplanned cause.</p> <p>N/A</p>
Whether Xcel should continue providing gas service interruption information in the five categories used for October through December 2010.	Already changed in 2011 report	N/A	N/A	N/A	N/A
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.	Already changed in 2011 report	N/A	N/A	N/A	N/A
Service Interruptions & Integrity Events - Define calculations for Average Outage Time and Total Outage Time	<p>The start of the outage is when it's noted in our system that the gas is off; if that is not noted, we use the create time of the order. The end of the outage is when it's noted that gas is on; if that is not noted, we use the completion time of the order. The total outage time is the time for all the outages of that time period. The average outage is the total outage time divided by the number of homes affected.</p>	<p>CPE calculates the average duration for monthly outages by taking the total outage time for the month and dividing that by the number of customers lost.</p>	<p>MERC has not provided an average for outage times. MERC is willing to provide this in future Service Quality filings. MERC calculates total outage time as beginning when the outage is reported and completed when service is restored to the last affected customer.</p>	<p>IPL has not previously reported statistics related to outage times.</p>	<p>Total outage time is the time from notification of the outage until service is restored to the last customer. Average outage time equals the total outage minutes divided by the total customers out of service.</p>

Natural Gas Service Quality Reporting Workgroup  
Reporting Summary and Changes

	Xcel Energy	CPE	MERC	IPL	GP
<b>Gas Emergency Answer Times</b>	<p>Change: Eff with 2012 report, include internal performance goal for answering gas emergency calls (% percent in x seconds).</p> <p>We report calls from our MN customers either directly to our Gas Emergency line or to one of our other customer service numbers where the average speed of answer for gas emergency calls as well as the average speed of answer for those calls.</p>	<p>Change: Eff with 2012 report, include internal performance goal for answering gas emergency calls (% percent in x seconds).</p> <p>Schedule 7: The percent of calls received on our published emergency line answered 24x7 within 20 seconds, the average speed of answer and the total number of calls answered. This line may also receive other than emergency calls. ASA and total number of calls answered are reported as originally required in Docket G008/GR-04-201.</p>	<p>Change: Eff with 2012 report, include internal performance goal for answering gas emergency calls (% percent in x seconds).</p> <p>MERC provides the monthly total calls received, average speed of answer and % answered in 15 seconds or less. MERC also provides the tech response time from initial call to arrival for all emergency calls. The numbers are categorized by &lt; 1 hour or &gt; 1 hour. MERC also breaks this information down on by service region as requested by the Department. MERC provides the monthly average response time with its goal of having an average response time of 30 minutes or less.</p>	<p>Change: Eff with 2012 report, include internal performance goal for answering gas emergency calls (% percent in x seconds).</p> <p>Both gas and electric callers who respond "Yes" to the initial interactive voice response question "Is this a life threatening emergency, such as a downed wire or gas odor?"</p>	<p>Change: Eff with 2012 report, include internal performance goal for answering gas emergency calls (% percent in x seconds).</p> <p>Total calls answered, percentage of calls answered in 20 seconds or less, and the average speed of answer.</p>
<p>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.</p> <p>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</p>	<p>Already included in 2011 report</p> <p>Internal goal is 80/20, though we place a priority on gas emergency calls.</p>	N/A	N/A	N/A	N/A
<b>Gas Emergency Response Times</b>	<p>Change: Eff with 2012 report, will provide MnOPS reports.</p> <p>We report all gas emergency calls: the count, the answer and talk time, the dispatch/enroute time, travel time, and then the total response time as well as all averages and % of calls responded to under and over 60 minutes. (Our gas emergency calls classifications are: blowing gas, explosion, fire, carbon monoxide with and without symptoms, feed regulator, smells gas inside, smells gas outside, no gas, and high or low pressure)</p>	<p>Change: None. Already provides MnOPS reports.</p> <p>Schedule 12: The reporting metric is the time from the initial notification to the time that a qualified emergency response person arrives at the incident location for purposes of making the area safe. Emergency response times are reported, by metro and outstate, as calls responded to in one hour or less and calls responded to in over one hour. CenterPoint Energy provides number and the percentage of emergencies responded to within one hour and within more than one hour. CenterPoint also provides the average number of minutes it takes to respond to an emergency. This same information, in total, is reported in the Emergency Response Report to the Minnesota Office of Pipeline Safety (MnOPS).</p>	<p>Change: Eff with 2012 report, will provide MnOPS reports.</p> <p>MERC provides the tech response time from initial call to arrival for all emergency calls. The numbers are categorized by &lt; 1 hour or &gt; 1 hour. MERC also breaks this information down on by service region as requested by the Department. MERC provides the monthly average response time with its goal of having an average response time of 30 minutes or less.</p>	<p>Change: Eff with 2012 report, will provide MnOPS reports.</p> <p>Any call coded as a gas emergency (CO, fire, line hit, odor) will be included in PUC submittals.</p>	<p>Change: Eff with 2012 report, will include an average response time calculation.</p> <p>Emergency response calls categorized by calls responded to in 1 hour or less and calls responded to in over 1 hour. Also report the average response time in minutes.</p>
<p>Please describe how/what you report to the PUC</p>	<p>We report five more types of calls in our gas QSP reports than we do in our MnOPS reports based on MnOPS preference (we do not report on any types of carbon monoxide calls, ice/snow on regulator, no gas, and high/low pressure gas to MnOPS).</p>	<p>Provide Monthly required reporting as specified by MnOPS and is duplicated in our PUC report.</p>	<p>Same as above</p>	<p>Any call coded as a gas emergency (CO, fire, line hit, odor) will be included in MnOPS submittals.</p>	<p>Some information is reported to MnOPS on the monthly Emergency Response Reporting Form.</p>
<p>Define call types included in MnOPS Reports</p>	<p>We report the following call types: blowing gas, explosion, fire, smells gas inside, smells gas outside</p>	<p>The orders that make up this report include all calls received from customers, contractors, passer-bys, 911 dispatches, or company personnel relating to: gas odors, gas leaks, indications of high pressure, fires, incidents, hit gas lines (either inside or outside).</p>	<p>MERC files 2 annual reports with MnOPS. One report provides emergency call responses in 1 hour or less and those over 1 hour. This report is for all gas leak calls and does not include those that specifically state it is a carbon monoxide call. The other report, Annual Utility Damage Report form, provides the total number of locate requests, total number of damages and the cause for those reported damages. There are 11 categories for the cause for damage.</p>	<p>IPL codes the following issues as emergency calls: Carbon Monoxide, Fire, Line Hit, and Odor.</p>	<p>GP reports fire, explosion, line hits, and odor calls.</p>

Natural Gas Service Quality Reporting Workgroup  
Reporting Summary and Changes

	Xcel Energy	CPE	MERC	IPL	GP
Highlight any differences between MnOps Reports and MPUC reported items.	See above. We report five more types of calls in our gas QSP reports than we do in our MNOPS reports, based on MNOPS preference.	We report the same items.	In the MPUC report MERC provides the % of calls answered in < 1 hour and > 1 hour and the average response time. For mistakes MERC reports the total number of locates same as the MnOps report but does not have as many cause reasons. The MPUC has only 3 categories, system integrity, fault of MERC or its contractors and other.	None. Any call that is coded as an emergency will be included in the statistical reports submitted both to the Commission and MNOPS.	Great Plains was directed to report all gas service interruptions regardless of qualifying as reportable to MnOps in Docket No. G004/M-11-363.
Whether to require Great Plains to provide, in future annual reports, an average response time calculation for all emergency responses.	N/A	N/A	N/A	N/A	GP will provide this information in the 2012 report.
Whether to require the gas utilities to provide future annual reports, including non-reduced copies of their MnOPS Emergency Response Reporting Forms.	Already included in 2011 report	Currently providing monthly Emergency Response Forms	Only if it eliminates the need to report the same information in the emergency response time in the quality report.	Not an issue to provide this. Will include in the 2012 report.	GP attaches the complete and non-reduced copies of the MnOPS form to its Service Quality Report.
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 MnOPS in the MnOPS Emergency Response Reporting Forms	It is not possible to reconcile the existing service quality and MnOPS reports due to the breakdown of the emergency response numbers. The 2 reports require different classification and the differing req's is a start/stop of the QSP vs. MNOPS forms.	Currently using MnOPS reports to complete Service quality reporting.	No opinion either way.	These numbers should be the same and could be provided.	GP reports the same information
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.	As part of the Working Group, it was determined that all utilities will provide MnOPS reports for their annual reports, so no reconciliation is necessary. The Xcel QSP report will additionally be provided as additional emergency response (as summarized above).	As part of the Working Group, it was determined that all utilities will provide MnOPS reports for their annual reports, so no reconciliation is necessary.	As part of the Working Group, it was determined that all utilities will provide MnOPS reports for their annual reports, so no reconciliation is necessary.	As part of the Working Group, it was determined that all utilities will provide MnOPS reports for their annual reports, so no reconciliation is necessary.	As part of the Working Group, it was determined that all utilities will provide MnOPS reports for their annual reports, so no reconciliation is necessary.
<b>Major Incident Reporting</b>	Change: Eff with 2012 report, will provide a summary of contemporaneous reports rather than each notification email.	Change: None.	Change: None.	Change: None.	Change: None.
Please describe how/what you report.	Similar to our electric reports, we provide a copy of every email we send to the CAO and the individual summary of the notification that was attached to it.	Provides a summary of all notifications from the year.	Provides a summary of all notifications from the year.	Provides a summary of all notifications from the year.	Provides a summary of all notifications from the year.
<b>Customer Service Related O&amp;M Expenses</b>	Change: None.	Change: None.	Change: None.	Change: None.	Change: None.
Please describe how/what you report	We provide the customer service related O&M expenses included in FERC accounts 901 and 903 plus payroll taxes and benefits both for NSPM (which includes MN, ND and SD operations) as well as the state of MN.	Schedule 13; includes FERC accounts 901 and 903 plus payroll taxes and benefits.	MERC reports all expenses associated with FERC accounts 901 and 903 plus payroll taxes and benefits.	Costs related to FERC accounts 901 and 903, including payroll taxes and benefits.	The costs recorded in FERC accounts 901 and 903, plus payroll taxes and benefits.
<b>Additional Service Quality Reporting</b>					
Please describe any additional information included in annual service quality reporting	QSP Tariff annual Gas Emergency Response report.	Schedule 14; Steel service line relocation cost, as ordered in Docket G008/M-09-1190	N/A	N/A	N/A
Please describe any additional information included in annual service quality reporting	N/A	Schedule 15; Meters at 630 or Greater Cost, as ordered in Docket G008/M-09-1190	N/A	N/A	N/A
Please describe any additional information included in annual service quality reporting	N/A	Schedule 16; Calls Received from Dedicated Lines, as ordered in Docket G008/GR-04-901	N/A	N/A	N/A
<b>Docket Numbers</b>					
SQ Docket Numbers	2002-2011 - E-G002/CI-02-2034 2003 - E-G002/M-03-58 2009 - G002/M-09-841 (SQ TARIFF AMENDMENTS) 2010 - E-G002/CI-10-691 (TARIFF MODIFICATION) 2011 - G002/M-11-360 2012 - G002/M-12-440	2004 - G-008/GR-04-901 2005 - G-008/GR-04-901 2006 - G-008/M-06-1485 2007 - G007/CI-07-1641 2008 - G-008/M-08-396 2009 - G-008/M-09-390 & G-999/CI-09-409 2010 - G-008/M-10-378 2011 - G-008/M-12-425	2003 - G007/CI-02-1369 2004 - G007/CI-02-1369 2005 - G007/CI-02-1369 2006 - G007/CI-02-1369 2007 - G007/CI-07-1642 2008 - G007/CI-08-397 2009 - G007/CI-09-488 2010 - G007/CI-10-374 2011 - G007/CI-12-436	2010 - G999/M-11-361 2011 - G999/M-12-411	2009 - G-999/CI-09-409 2011 - G004/M-11-363 2012 - G004/M-12-442

Note: The focus of the workgroup was 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.

## **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. G001/M-13-324**

Dated this 19<sup>th</sup> day of **December, 2013**

**/s/Sharon Ferguson**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Bobby	Adam	bobby.adam@conagrafoods.com	ConAgra	Suite 5022 11 ConAgra Drive Omaha, NE 68102	Electronic Service	No	OFF_SL_13-324_M-13-324
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_13-324_M-13-324
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_13-324_M-13-324
William A.	Blazar	bblazar@mnchamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Electronic Service	No	OFF_SL_13-324_M-13-324
Michael	Bradley	mike.bradley@lawmoss.com	Moss & Barnett	Suite 4800 90 S 7th St Minneapolis, MN 55402-4129	Electronic Service	No	OFF_SL_13-324_M-13-324
City	Clerk	sschulte@city.albertlea.org	City of Albert Lea	221 E Clark St  Albert Lea, MN 56007	Electronic Service	No	OFF_SL_13-324_M-13-324
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, BRM Tower St. Paul, MN 55101	Electronic Service	No	OFF_SL_13-324_M-13-324
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_13-324_M-13-324
David	Grover	dgrover@itctransco.com	ITC Midwest	444 Cedar St Ste 1020  Saint Paul, MN 55101-2129	Electronic Service	No	OFF_SL_13-324_M-13-324
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_13-324_M-13-324

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_13-324_M-13-324
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street  St. Paul, MN 551012134	Electronic Service	No	OFF_SL_13-324_M-13-324
Jim	Krueger	jkrueger@fmcs.coop	Freeborn-Mower Cooperative Services	Box 611  Albert Lea, MN 56007	Electronic Service	No	OFF_SL_13-324_M-13-324
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_13-324_M-13-324
Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd  Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_13-324_M-13-324
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_13-324_M-13-324
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_13-324_M-13-324
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_13-324_M-13-324
Steven	Nyhus	swnyhus@flaherty-hood.com	Flaherty & Hood PA	525 Park St Ste 470  Saint Paul, MN 55103	Electronic Service	No	OFF_SL_13-324_M-13-324
Kent	Ragsdale	kentagsdale@alliantenergy.com	Alliant Energy-Interstate Power and Light Company	P.O. Box 351 200 First Street, SE Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_13-324_M-13-324

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_13-324_M-13-324
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	12 S 6th St Ste 1137  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-324_M-13-324
Matthew J.	Schuerger P.E.	mjsreg@earthlink.net	Energy Systems Consulting Services, LLC	PO Box 16129  St. Paul, MN 55116	Electronic Service	No	OFF_SL_13-324_M-13-324
Ron	Spangler, Jr.	rlspangler@otpc.com	Otter Tail Power Company	215 So. Cascade St. PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_13-324_M-13-324
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE  Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_13-324_M-13-324