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May 30, 2014

Dr. Burl Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
121 East Seventh Place, Suite 350  
St. Paul, MN 55101

**Re: Review of 2013 Annual Service Quality Report  
Docket No. G004/M-14-332**

Dear Dr. Haar:

Pursuant to the Minnesota Public Utilities Commission's ("Commission") January 18, 2011 Order Setting Reporting Requirements for service quality information in Docket No. G999/CI-09-409, Great Plains Natural Gas Co. ("Great Plains") submitted the annual report on April 22, 2014 for calendar year 2013. Great Plains respectfully submits the following Reply Comments in response to comments filed by the Minnesota Department of Commerce on May 20, 2014 in the above-referenced proceedings.

If you have any questions regarding this filing, please contact me at (701) 222-7856, or Brian Meloy, at (612) 335-1451.

Sincerely,

*/s/ Tamie A. Aberle*

Tamie A. Aberle  
Director of Regulatory Affairs

cc: Brian Meloy

**STATE OF MINNESOTA  
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

Beverly Jones Heydinger	Chair
Dr. David C. Boyd	Commissioner
Dan Lipschultz	Commissioner
Betsy L. Wergin	Commissioner
Nancy Lange	Commissioner

In the Matter of 2013 Annual Gas	)	Docket No. G004/M-14-332
Quality Report	)	
	)	
	)	

**REPLY COMMENTS OF  
GREAT PLAINS NATURAL GAS CO.**

Pursuant to the Minnesota Public Utilities Commission's ("Commission") January 18, 2011 Order Setting Reporting Requirements for service quality information in Docket No. G999/CI-09-409, Great Plains Natural Gas Co. ("Great Plains") submitted the annual report on April 22, 2014 for calendar year 2013. Great Plains respectfully submits the following Reply Comments in response to comments filed by the Minnesota Department of Commerce (Department) on May 20, 2014, in the above-referenced proceedings.

Customer Complaints

At page 6 section F of its May 20 Comments, the Department noted the Company had failed to assign 26 of the 28 complaints a resolution type. The Department requested that Great Plains explain in its Reply Comments why the data for the limited number of complaints tracked did not consistently include resolution type, including whether resolution type will be tracked and reported for the expanded reporting planned for 2014.

In response to the Department's inquiry into the resolution type of Not Assigned as shown on Schedule 6, page 4 of its 2013 Gas Service Quality Report, Great Plains reviewed the 26 complaints with a resolution type of Not Assigned. Upon this review, Great Plains re-assigned the 26 complaints the correct resolution type based on the action taken. Please see the attached revised Schedule 6, page 4 of the 2013 Gas Service Quality Report.

Resolution type will be tracked and a schedule included within Customer Complaints Section 6 of the Company's 2014 Gas Service Quality Report.

### Gas Emergency Calls

At page 6 section G of its May 20 Comments, the Department noted the Company had not reported a month with average answer times in excess of 20 seconds in either 2012 or 2011. In 2013, Great Plains had two months, October and December, in which both months averaged well over 20 seconds (36 and 28 seconds, respectively). The Department requested that Great Plains address the factors impacting its speed-of-answer performance in October and December 2013.

The increase in the Average Speed of Answer (ASA) observed in both October and December 2013 can be mainly attributable to the unexpected increased call activity that occurred on select weekends in both months. Unexpected increased call activity may occur due to weather related or outage events that occur in the service territories of both Great Plains and Montana-Dakota Utilities Co. During these limited circumstances, dedicated customer service representatives may be asked to assist in responding to customers calls outside of their normal responsibilities. Great Plains is committed to providing quality customer service to its customers at all times and will continue to monitor this metric and implement any necessary measures to ensure a timely response is provided to the Company's customers at all times.

### Service Interruptions

At page 9 section K of its May 20 Comments, the Department noted that while there were 19 fewer interruptions in 2013 than there were in 2012, there were more customers affected by those outages (203 in 2013 as compared to 167 in 2012). The Department requested that Great Plains provide a discussion in its Reply Comments regarding the increase in mislocates in 2013 and what impact that increase had on the amount of customers affected by outages.

The PVC main and service replacement project mentioned in the 2012 Gas Service Quality Report continued in 2013. Over the course of the replacement project the Company has undertaken measures to help prevent damages related to PVC pipe replacement. As noted by the Department, the actual number of service interruptions decreased by 19 in 2013. However, the number of customers affected by service interruptions increased in 2013. A total of 82 customers were affected by mislocates in 2013 of which 63 customers were affected by one incident in October 2013. The

increase in the number of mislocates for 2013 did not contribute to the increase in the number of customers affected by outages.

### CONCLUSION

WHEREFORE, for the foregoing reasons, Great Plains respectfully requests that the Commission consider the reply comments expressed above and accept Great Plains 2013 Annual Service Quality Report.

**Dated: May 30, 2014**

**Respectfully submitted,**

By */s/ Tamie A. Aberle*  
Tamie A. Aberle  
Director of Regulatory Affairs  
Great Plains Natural Gas Co.  
a Division of MDU Resources  
Group  
400 North Fourth Street  
Bismarck, ND 58501

**Great Plains Natural Gas Co.  
Gas Service Quality Annual Report  
For the Calendar Year Ending December 31, 2013**

**Number & Percentage of Customer Complaints by Resolution Type - REVISED**

	Total		Jan		Feb		Mar		Apr		May		June		July		Aug		Sept		Oct		Nov		Dec					
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%				
<b>Residential</b>																														
Agree	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%		
Compromise	11	39%	0	0%	0	0%	1	100%	0	0%	1	17%	1	34%	3	60%	0	0%	2	67%	3	38%	0	0%	0	0%	0	0%		
Demonstrate	8	29%	1	100%	0	0%	0	0%	0	0%	2	33%	1	33%	0	0%	0	0%	1	33%	3	38%	0	0%	0	0%	0	0%		
Refuse	9	32%	0	0%	0	0%	0	0%	0	0%	3	50%	1	33%	2	40%	1	100%	0	0%	2	24%	0	0%	0	0%	0	0%		
Not Assigned	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%		
<b>Total Residential</b>	<b>28</b>	<b>100%</b>	<b>1</b>	<b>100%</b>	<b>0</b>	<b>0%</b>	<b>1</b>	<b>100%</b>	<b>0</b>	<b>0%</b>	<b>6</b>	<b>100%</b>	<b>3</b>	<b>100%</b>	<b>5</b>	<b>100%</b>	<b>1</b>	<b>100%</b>	<b>3</b>	<b>100%</b>	<b>8</b>	<b>100%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>		
<b>Commercial</b>																														
Agree	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Compromise	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%		
Demonstrate	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%		
Refuse	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%		
Not Assigned	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%		
<b>Total Commercial</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>		