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November 9, 2017

VIA ELECTRONIC FILING

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Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101

Re: In the Matter of the Annual Service Quality Report for Minnesota
Energy Resources Corporation for 2015, Docket No. G011/M-16-371

In the Matter of the Annual Service Quality Report for Minnesota
Energy Resources Corporation for 2016, Docket No. G011/M-17-343

Reply Comments of Minnesota Energy Resources Corporation

Dear Mr. Wolf:

On October 20, 2017, the Minnesota Department of Commerce, Division of Energy Resources ("Department") filed Comments in the above-referenced dockets recommending that the Minnesota Public Utilities Commission ("Commission") accept Minnesota Energy Resources Corporation's ("MERC's" or the "Company's") 2015 and 2016 Annual Service Quality Reports pending MERC's responses to various inquiries in Reply Comments. Specifically, the Department requested that the Company provide:

- An explanation for the apparent emerging trend in increasing average call response time;
- An explanation for the large increase in meters not read in 6-12 months and over 12 months in 2016;
- An explanation for the anomalous disconnection figures in 2016;
- An explanation for the sharp decline in deposits held in 2016;
- A schedule showing an item-by-item breakdown of each service interruption in 2016; and
- An explanation for the increase in operations and maintenance ("O&M") expense in FERC 901 and decrease in FERC 903 in 2016.

MERC thanks the Department for its review and submits these Reply Comments in response to the Department's requests for additional information and in accordance with the Commission's September 29, 2017 Fourth Notice of Extended Comment Period.

Initially MERC notes that in 2016, MERC implemented its Improved Customer Experience ("ICE") customer information system ("CIS") that affected all of MERC's billing, credit and collections, and customer service functions. MERC converted its systems in January 2016 and the initial stabilization of that system took place throughout 2016. As MERC discussed in its January 31, 2017, Compliance Filing in Docket No. G011/GR-15-736, stabilization was anticipated to occur over an approximate one-year period following implementation of the new system and during this period, MERC worked to resolve conversion issues and ensure employees were fully trained on the new systems. As a result, MERC's reporting for 2016 includes variations from previous trends but those deviations were generally expected as part of the conversion process. As discussed below, MERC believes that it has appropriately addressed these temporary, one-time deviations attributable to the system conversions in 2016.

1. Call Center Response Time

First, with respect to call center response times, the Department requests that MERC address the apparent emerging trend in increasing average call response time, noting that it does not appear that call volume is an indicator of response time performance.

While the average response times in 2014, 2015, and 2016 were somewhat higher than in prior years, MERC does not believe the data shows an increasing average or trend. Notably, while the average response time in 2014 was higher than other years, the average response time was noticeably lower in 2015. Moreover, the increase in average response times during 2014 and 2016 is a result of specific events and circumstances, to which MERC responded appropriately, rather than a general trend. Additionally, based on current reporting information, MERC anticipates its 2017 average call response times to be lower than the average response times for 2014, 2015 and 2016.

	Response Time (seconds) ⁵	Total Calls
2010	17	277,329
2011	18	248,020
2012	20	327,851
2013	19	397,404
2014	36	397,976
2015	28	369,736
2016	38	252,972

In 2014, as discussed in the Department's Comments at Page 3, customers experienced higher than normal gas consumption during the polar vortex in 2014. As a result, customer bills were higher than usual, which in turn led to an increase in the number of customer inquiries MERC received. In particular, the highest wait times occurred in March and April in part because of the influx of credit-related calls from customers seeking to set up arrangements to avoid disconnections after the cold-weather rule period.

To the extent response times were somewhat higher in 2015 than previous years (though lower than 2014), the increase in can be attributable to MERC's efforts to prepare for the implementation of our ICE CIS. In 2015, MERC hired additional call representatives and resources to stabilize response times and prepare for system conversion. The fall months tend to be busier than other months, as customers call the company to make arrangements for service during colder weather. During fall and winter 2015, MERC conducted employee training to prepare for the new CIS and despite the hiring of additional headcount, the resources available to answer calls were unable to keep pace with the higher volume of calls during this period. Because the additional staffing hired to prepare for the new system and offset training was not sufficient, efforts were made to hire additional classes prior to the go-live date of the ICE CIS.

With respect to 2016, the ICE CIS was implemented in January, influencing the call response times in January and February as MERC worked through initial ICE stabilization and attempted to hire and train new headcount. Again, as with previous months, MERC tracked the response times as they occurred, and reacted to recruit additional resources to ensure continued level of service during conversion. In general, MERC's attempts to return to level of service in 2016 were successful and if the months of January and February are removed from the response time calculation, the average response time for 2016 (March through December) was 20 seconds, in line with response times between 2010 and 2013.

At this time, it appears that the response times for 2017 continue to trend below the times experienced in 2014 and 2016 and MERC expects the average response time for 2017 to be below the average response time for 2016.

2. Meter Reading Performance

Second, with respect to MERC's meter reading performance, the Department notes that there appeared to be a large increase in meters not read for 6 to 12 months at the end of 2016. The Department requests that MERC provide an explanation for the increase in meters not read in 6 to 12 months and over 12 months.

Upon further investigation, MERC determined that its report of meter reading data was coded incorrectly, affecting the reporting data submitted in Attachment 2 to MERC's May 1, 2017 filing. MERC has now corrected these coding issues and submits a corrected meter reading report as Attachment A to these Reply Comments. As shown in Attachment A, MERC's corrected meter reading data for meters not read in 6 to 12 months and over 12 months is in line with prior years.

3. Involuntary Service Disconnections

Third, with respect to service disconnections, the Department notes that disconnection levels were higher at the beginning of 2015 than at the end of the year and reached their peak during the spring and summer of 2015 (roughly coinciding with the end of the Cold Weather Rule period). In 2016, disconnection levels significantly decreased by 96 percent compared to 2015. The Department requests that MERC provide an explanation in Reply Comments for the anomalous disconnection figures in 2016.

MERC responds that the large reduction in disconnections in 2016 is a result of MERC having temporarily suspended disconnection activity during the transition to the new ICE CIS and during the period of system stabilization. The suspension of credit and collection activities during a CIS conversion is common practice. In particular, the primary focus following conversion and during system stabilization is to ensure the ability to bill customers accurately and in a timely manner, and to respond to customer calls and inquiries. As those systems stabilize, credit and collection activities are re-initiated.

MERC reinitiated its disconnection process in the latter part of 2016 and as a result, does not anticipate the same trend in 2017 reported disconnections.

4. Customer Deposits

Fourth, regarding customer deposits, the Department notes that MERC reported two customers were required to make deposits in 2015 due to theft of service and there were no new deposits in 2016. The Department requested that MERC provide an explanation in Reply Comments regarding the sharp decline in deposits held in 2016.

MERC responds that the decline in deposits held in 2016 was a result of MERC's transition to the new ICE CIS. MERC initially refunded customer deposits held prior to transition to simplify transition to the new CIS, and subsequently suspended the collection of new deposits during stabilization. MERC reinitiated deposit collections in the fall of 2017 and anticipates reporting on deposits to begin increasing with 2017 reporting. However, because deposit collection was still largely suspended for a portion of 2017, MERC's 2017 reporting is expected to be lower than historic averages.

However, MERC has also realigned job responsibilities on credit and collections and streamlined its processes and is continuing efforts to identify ways to further increase productivity and evaluate potential process changes to help reduce customer arrears and bad debt write offs.

5. Service Interruptions

Fifth, with respect to service interruptions, the Department noted that MERC provided an item-by-item breakdown of each service interruption in 2015 but did not include an item-by-item breakdown in 2016. The Department therefore requested that MERC provide such a breakdown of service interruptions for 2016.

MERC originally began providing an item-by-item breakdown of each service interruption with its 2012 Service Quality Report. As noted by the Department in its Comments, the Commission's March 6, 2012, Order in Docket No. G007,011/M-10-374, required MERC to provide the number of customers affected by a service interruption and the average duration of the interruptions beginning with its 2011 report. Through its participation in the workgroup, MERC indicated that it would calculate total outage time as beginning when the outage is reported and ending when service is restored to the last affected customer. Consequently, as part of its 2012 Report, MERC included a spreadsheet with an item-by-item breakdown of each service interruption in 2012, 2013, 2014 and 2015.

With its 2016 Service Quality Report, MERC evaluated the information required to be reported on service interruptions and determined that a summary report rather than item-by-item report would address the required information. MERC believes that the information included in Attachment 9 to its 2016 Service Quality Report

addresses the Commission's Order requiring the Company to report the number of customers whose service was interrupted and the average duration of interruptions, and notes that average duration continues to be measured as the time beginning when the outage is reported and ending when service is restored to the last affected customers.

Nevertheless, MERC provides an item-by-item report, consistent with prior Annual Service Quality Reports, as Attachment B to these Reply Comments. The nonpublic version of this attachment contains customer addresses. This information is maintained by MERC as private customer data and has been excised from the public version of the filing in accordance with Minn. Stat. §13.679. Because MERC internally audited its service reporting information after the submission of our 2016 annual service quality filing, a few service interruptions were reclassified from what was reported in MERC's summary report and one duplicative service interruption incident was removed.

6. Customer Service-Related O&M Expense

Finally, the Department noted that in 2016, the amounts recorded to FERC Account 901 and FERC Account 903 shifted considerably and requested that MERC address the increase in FERC Account 901 and decrease in FERC Account 903.

As anticipated in the Direct Testimony of Seth DeMerritt filed in Docket No. G011/GR-15-736, as a result of MERC's implementation of ICE the costs for Vertex were reduced and cross-charges related to customer service support increased. This shift of costs in FERC accounts 901 and 903 is reflected in MERC's 2016 quality of service reporting.

Again, MERC thanks the Department for its review of the 2015 and 2016 annual quality of service filings. Please contact me at (651) 322-8965 if you have any questions regarding the information in this submission.

Sincerely yours,

/s/ Amber S. Lee

Amber S. Lee
Regulatory and Legislative Affairs Manager
Minnesota Energy Resources Corporation

cc: Service List

Meter Reading Performance

	Total meters	# company read	% company read	# self-read	% of self- read	# not read in 6-12 months	% not read in 6-12 months	# not read > 12 months	% not read > 12 months	Comments
without farm taps										
January	235,034	196,778	83.72%	70	0.03%	2	0.0009%	1	0.0004%	accessibility and dogs
February	238,537	231,486	97.04%	49	0.02%	1	0.0004%	1	0.0004%	accessibility and dogs
March	238,020	232,907	97.85%	43	0.02%	0	0.0000%	1	0.0004%	accessibility and dogs
April	237,069	217,041	91.55%	48	0.02%	0	0.0000%	0	0.0000%	accessibility and dogs
May	238,572	235,632	98.77%	142	0.06%	0	0.0000%	0	0.0000%	accessibility and dogs
June	240,133	237,752	99.01%	110	0.05%	0	0.0000%	0	0.0000%	accessibility and dogs
July	238,561	222,136	93.11%	48	0.02%	0	0.0000%	0	0.0000%	accessibility and dogs
August	239,693	237,472	99.07%	69	0.03%	0	0.0000%	0	0.0000%	accessibility and dogs
September	239,309	235,056	98.22%	105	0.04%	0	0.0000%	0	0.0000%	accessibility and dogs
October	240,269	236,555	98.45%	150	0.06%	0	0.0000%	0	0.0000%	accessibility and dogs
November	240,423	233,108	96.96%	139	0.06%	0	0.0000%	0	0.0000%	accessibility and dogs
December	241,616	237,783	98.41%	148	0.06%	0	0.0000%	0	0.0000%	accessibility and dogs
Total	2,867,236	2,753,706	96.04%	1,121	0.04%	3	0.0001%	3	0.0001%	

with farm taps										
January	237,607	198,575	83.57%	567	0.24%	37	0.0156%	7	0.0029%	
February	240,719	233,210	96.88%	157	0.07%	5	0.0021%	1	0.0004%	
March	240,554	234,927	97.66%	337	0.14%	2	0.0008%	1	0.0004%	
April	239,908	219,371	91.44%	332	0.14%	0	0.0000%	0	0.0000%	
May	241,719	237,995	98.46%	711	0.29%	1	0.0004%	0	0.0000%	
June	242,680	239,787	98.81%	403	0.17%	2	0.0008%	0	0.0000%	
July	240,789	223,882	92.98%	285	0.12%	1	0.0004%	0	0.0000%	
August	241,923	239,206	98.88%	350	0.14%	0	0.0000%	0	0.0000%	
September	241,535	236,711	98.00%	449	0.19%	0	0.0000%	0	0.0000%	
October	242,949	238,242	98.06%	925	0.38%	6	0.0025%	0	0.0000%	
November	242,621	234,133	96.50%	964	0.40%	11	0.0045%	0	0.0000%	
December	243,843	238,993	98.01%	948	0.39%	15	0.0062%	0	0.0000%	
Total	2,896,847	2,775,032	95.79%	6,428	0.22%	80	0.0028%	9	0.0003%	

	January	February	March	April	May	June	July	August	September	October	November	December	Total
Meter reading staffing*	23.6	29.6	28.1	24.2	24.4	24.8	23	26.2	23.6	23.4	24	27	301.9

* approximate FTEs based on labor reports

Service Interruptions 2016

Damage Date	[PRIVATE DATA BEGINS... Address	City	No Cust Effected	Outage Duration	Outage caused by MERC employee or MERC contractor	Outage caused by other
1/7/2016		DODGE CENTER	1	84	No	Yes
1/11/2016		PINE CITY	1	30	Yes	No
2/8/2016		LAKEVILLE	1	373	No	Yes
3/2/2016		DETROIT LAKES	1	5	No	Yes
3/8/2016		BYRON	5	160	No	Yes
3/12/2016		WINDOM	1	97	No	Yes
3/29/2016		THEIF RIVER FALLS	1	100	No	Yes
4/13/2016		EAGAN	1	165	Yes	No
4/15/2016		ROCHESTER	1	49	Yes	No
4/17/2016		DETROIT LAKES	1	15	No	Yes
4/21/2016		FARMINGTON	1	90	No	Yes
4/22/2016		ROCHESTER	1	90	No	Yes
4/22/2016		BYRON	1	93	No	Yes
4/22/2016		EAGAN	2	277	Yes	No
4/25/2016		ALBERT LEA	4	110	Yes	No
4/26/2016		ROCHESTER	2	197	No	Yes
4/26/2016		EAGAN	1	200	No	Yes
4/27/2016		PINE CITY	1	120	No	Yes
4/29/2016		THEIF RIVER FALLS	1	195	No	Yes
5/3/2016		GRAND RAPIDS	1	63	No	Yes
5/3/2016		LAKEVILLE	2	575	No	Yes
5/4/2016		ROCHESTER	1	235	No	Yes
5/5/2016		NORTH BRANCH	1	50	Yes	No
5/8/2016		CANBY	1	30	No	Yes
5/9/2016		STEWARTVILLE	1	247	No	Yes
5/10/2016		ORTONVILLE	1	120	No	Yes
5/11/2016		DEERWOOD	17	330	No	Yes
5/12/2016		ELKO	1	15	Yes	No
5/12/2016		PINE ISLAND	1	85	No	Yes
5/12/2016		ALBERT LEA	1	343	Yes	No
5/14/2016		ALBERT LEA	1	121	No	Yes
5/16/2016		WINDOM	1	10	No	Yes
5/18/2016		DETROIT LAKES	1	5	No	Yes
5/18/2016		ROCHESTER	1	95	No	Yes
5/18/2016		AURORA	5	423	No	Yes
5/21/2016		BUHL	1	40	No	Yes
5/21/2016		ALBERT LEA	1	60	No	Yes
5/23/2016		ROCHESTER	1	77	Yes	No
5/23/2016		FARMINGTON	1	90	No	Yes
5/24/2016		ROCHESTER	2	85	No	Yes
5/28/2016		WORTHINGTON	1	7,327	No	Yes
5/31/2016		ROCHESTER	2	107	No	Yes
6/1/2016		ROCHESTER	7	56	No	Yes
6/1/2016		GRAND RAPIDS	1	120	Yes	No
6/1/2016		LAKEVILLE	3	134	No	Yes
6/2/2016		GRAND RAPIDS	1	35	No	Yes
6/2/2016		GRAND RAPIDS	1	120	No	Yes
6/2/2016		CANNON FALLS	1	360	Yes	No
6/3/2016		EAGAN	1	12	No	Yes
6/4/2016		WORTHINGTON	1	180	No	Yes
6/6/2016		ROCHESTER	1	30	No	Yes
6/7/2016		MIDWAY	1	37	No	Yes
6/7/2016		ALBERT LEA	1	106	Yes	No
6/8/2016		AITKIN	1	50	No	Yes
6/8/2016		STURGEON LAKE	1	930	No	Yes
6/15/2016		CANNON FALLS	1	425	No	Yes
6/17/2016		CLOQUET	1	60	No	Yes
6/18/2016		ALBERT LEA	1	25	No	Yes
6/18/2016		BEMIDJI	1	90	No	Yes
6/18/2016		FARMINGTON	1	120	No	Yes
6/20/2016		ALTURA	1	138	No	Yes
6/21/2016		BEMIDJI	1	60	No	Yes
6/21/2016		LACRESCENT	4	75	Yes	No

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Attachment B

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6/22/2016	AURORA	2	80	No	Yes
6/22/2016	MOUNTAIN LAKE	1	80	Yes	No
6/22/2016	TAOPI	3	195	Yes	No
6/24/2016	ROCHESTER	1	10	No	Yes
6/24/2016	WORTHINGTON	1	15	No	Yes
6/24/2016	BEMIDJI	1	100	No	Yes
6/27/2016	ROCHESTER	1	60	No	Yes
6/27/2016	EAGAN	6	214	No	Yes
6/28/2016	THEIF RIVER FALLS	1	60	No	Yes
6/29/2016	HARMONY	1	160	No	Yes
7/1/2016	COTTONWOOD	1	120	No	Yes
7/4/2016	WARROAD	1	45	No	Yes
7/5/2016	ALBERT LEA	1	15	No	Yes
7/8/2016	LACRESCENT	2	105	Yes	No
7/8/2016	EAGAN	1	126	Yes	No
7/8/2016	ROCHESTER	3	480	Yes	No
7/11/2016	BEMIDJI	1	55	Yes	No
7/11/2016	THIEF RIVER FALLS	1	24	Yes	No
7/12/2016	ROCHESTER	1	105	No	Yes
7/12/2016	ROSEMOUNT	1	243	No	Yes
7/14/2016	EAGAN	1	220	No	Yes
7/18/2016	PINE CITY	1	1333	No	Yes
7/19/2016	ROCHESTER	1	90	No	Yes
7/20/2016	EAGAN	1	30	No	Yes
7/20/2016	COTTONWOOD	1	60	No	Yes
7/21/2016	BEMIDJI	1	240	No	Yes
7/22/2016	CLOQUET	1	60	No	Yes
7/25/2016	PINE CITY	1	30	No	Yes
7/25/2016	LAKEVILLE	1	152	No	Yes
7/25/2016	ADAMS	1	7580	Yes	No
7/26/2016	CANNON FALLS	1	30	No	Yes
7/26/2016	COTTONWOOD	1	65	Yes	No
7/26/2016	WARROAD	1	90	No	Yes
7/26/2016	ROCHESTER	1	300	Yes	No
7/27/2016	DEERWOOD	1	18	No	Yes
7/27/2016	ROCHESTER	1	60	No	Yes
7/28/2016	COTTONWOOD	1	60	No	Yes
7/29/2016	PINE CITY	1	40	No	Yes
8/1/2016	AITKIN	1	18	No	Yes
8/2/2016	PARK RAPIDS	1	15	No	Yes
8/2/2016	BAUDETTE	1	15	No	Yes
8/2/2016	CANNON FALLS	1	60	No	Yes
8/2/2016	ALBERT LEA	1	198	No	Yes
8/2/2016	ROCHESTER	1	330	No	Yes
8/3/2016	BEMIDJI	1	60	No	Yes
8/3/2016	PINE ISLAND	1	150	No	Yes
8/4/2016	ROCHESTER	1	260	No	Yes
8/5/2016	ALBERT LEA	1	386	No	Yes
8/8/2016	LAKEFIELD	2	120	No	Yes
8/9/2016	ALBERT LEA	1	15	Yes	No
8/10/2016	ROCHESTER	1	85	Yes	No
8/11/2016	DETROIT LAKES	1	335	Yes	No
8/15/2016	ALBERT LEA	10	174	No	Yes
8/15/2016	ROCHESTER	2	215	No	Yes
8/16/2016	WELLS	1	148	No	Yes
8/17/2016	CROSBY	1	26	Yes	No
8/18/2016	LAKEFIELD	1	139	No	Yes
8/18/2016	MORA	1	203	No	Yes
8/22/2016	CLOQUET	1	135	No	Yes
8/22/2016	LACRESCENT	13	420	No	Yes
8/24/2016	ALBERT LEA	1	54	No	Yes
8/24/2016	WADENA	1	55	No	Yes
8/24/2016	ROCHESTER	1	122	No	Yes
8/25/2016	WELLS	1	160	No	Yes
8/26/2016	PLAINVIEW	1	50	No	Yes
8/28/2016	ALBERT LEA	1	257	No	Yes
8/30/2016	THEIF RIVER FALLS	1	82	No	Yes

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9/2/2016		JACKSON	1	120	No	Yes
9/6/2016		ALBERT LEA	1	31	No	Yes
9/7/2016		BEMIDJI	1	30	No	Yes
9/8/2016		ROCHESTER	1	5	Yes	No
9/9/2016		PINE CITY	1	20	No	Yes
9/9/2016		INTERNATIONAL FALLS	24	194	Yes	No
9/12/2016		ROCHESTER	1	60	Yes	No
9/13/2016		DEERWOOD	2	30	No	Yes
9/13/2016		DODGE CENTER	1	210	No	Yes
9/14/2016		CLOQUET	1	30	No	Yes
9/14/2016		ROCHESTER	1	360	No	Yes
9/16/2016		ROCHESTER	1	114	Yes	No
9/20/2016		ALBERT LEA	1	73	Yes	No
9/20/2016		LAKEVILLE	6	75	No	Yes
9/21/2016		GRAND RAPIDS	1	60	No	Yes
9/26/2016		IVANHOE	19	54	No	Yes
9/26/2016		LACRESCENT	6	60	No	Yes
9/27/2016		FARMINGTON	1	58	No	Yes
9/27/2016		FARMINGTON	1	165	No	Yes
9/27/2016		EAGAN	1	1035	No	Yes
9/30/2016		ROCHESTER	5	245	Yes	No
10/6/2016		ROCHESTER	1	75	No	Yes
10/6/2016		MANTORVILLE	1	95	No	Yes
10/9/2016		PIKE LAKE	1	52	No	Yes
10/9/2016		SPRING VALLEY	1	120	No	Yes
10/14/2016		RUSH CITY	1	1	Yes	No
10/14/2016		LAKEFIELD	1	75	No	Yes
10/17/2016		MOOSE LAKE	1	131	No	Yes
10/17/2016		KASSON	4	153	Yes	No
10/19/2016		MOOSE LAKE	1	40	No	Yes
10/20/2016		DETROIT LAKES	1	240	No	Yes
10/24/2016		CANNON FALLS	1	169	No	Yes
10/25/2016		RUSHFORD	2	179	No	Yes
10/27/2016		BUHL	1	80	No	Yes
10/29/2016		BIWABIK	1	124	No	Yes
10/31/2016		ROCHESTER	1	60	No	Yes
11/2/2016		LACRESCENT	1	100	No	Yes
11/2/2016		ROSEAU	1	107	No	Yes
11/3/2016		ROCHESTER	1	67	No	Yes
11/3/2016		WINDOM	1	90	No	Yes
11/4/2016		HOYT LAKES	1	1	No	Yes
11/4/2016		ROSEMOUNT	1	104	No	Yes
11/6/2016		BYRON	3	46	No	Yes
11/9/2016		ALBERT LEA	1	60	No	Yes
11/15/2016		EAGAN	1	30	No	Yes
11/19/2016		ALBERT LEA	1	100	No	Yes
11/22/2016		THEIF RIVER FALLS	1	1200	No	Yes
11/26/2016		INTERNATIONAL FALLS	1	150	No	Yes
11/27/2016		EAGAN	1	995	No	Yes
11/28/2016		WADENA	1	105	No	Yes
11/29/2016		UTICA	1	5	No	Yes
12/2/2016		SPRING VALLEY	1	60	No	Yes
12/7/2016		ROCHESTER	1	345	No	Yes
12/8/2016		CANBY	2	40	No	Yes
12/9/2016		CLOQUET	1	42	Yes	No
12/15/2016		ROCHESTER	1	60	No	Yes
12/16/2016		AITKIN	1	540	No	Yes
12/20/2016		CLOQUET	21	210	No	Yes
12/21/2016		WADENA	1	30	No	Yes
12/30/2016		ALBERT LEA	1	264	No	Yes

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2016 Gas Service Interruptions**Outages Due to
Employees/Contractors**

Number of Customers:

Number of Outages:

Average Duration of
Outage(In Minutes):

<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	<u>Oct</u>	<u>Nov</u>	<u>Dec</u>	<u>Total 2016</u>
1	0	0	8	4	11	11	4	33	5	0	1	78
1	0	0	4	4	6	8	4	6	2	0	1	36
30	0	0	150	121	156	1092	115	115	77	0	42	158

**Outages Due to All Other
Causes**

Number of Customers:

Number of Outages:

Average Duration of
Outage(In Minutes):

<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	<u>Oct</u>	<u>Nov</u>	<u>Dec</u>	<u>Total 2016</u>
1	1	4	9	42	39	20	48	44	14	17	29	268
1	1	4	8	19	25	20	25	15	13	15	8	154
84	373	91	125	529	128	152	153	156	111	211	193	192

In the Matter of the Annual Service Quality
Report for Minnesota Energy Resources
Corporation for 2015

Docket No. G011/M-16-371

In the Matter of the Annual Service Quality
Report for Minnesota Energy Resources
Corporation for 2016

Docket No. G011/M-17-343

CERTIFICATE OF SERVICE

I, Kristin M. Stastny, hereby certify that on the 9th day of November, 2017, on behalf of Minnesota Energy Resources Corporation (MERC), I electronically filed a true and correct copy of the enclosed Reply Comments on www.edockets.state.mn.us. Said documents were also served via U.S. mail and electronic service as designated on the attached service list.

Dated this 9th day of November, 2017.

/s/ Kristin M. Stastny
Kristin M. Stastny

[illegible]

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristin	Stastny	kstastny@briggs.com	Briggs and Morgan, P.A.	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-371_16-371
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_16-371_16-371
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	No	OFF_SL_16-371_16-371

[illegible]

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristin	Stastny	kstastny@briggs.com	Briggs and Morgan, P.A.	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-343_M-17-343
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_17-343_M-17-343
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_17-343_M-17-343