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March 22, 2019

**VIA ELECTRONIC FILING**

Mr. Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, Minnesota 55101-2147

RE: Docket No. E,G999/CI-19-160  
In the Matter of a Commission Inquiry Into the Impact of Severe Weather in January and  
February 2019 on Utility Operations and Service

Dear Mr. Wolf:

Attached hereto, please find Greater Minnesota Gas, Inc.'s Comments for filing in the above-referenced docket.

All individuals identified on the attached service list have been electronically served with the same.

Thank you for your assistance. Please do not hesitate to contact me should you have any questions or concerns or if you require additional information. My direct dial number is (507) 665-8657 and my email address is [kanderson@greatermngas.com](mailto:kanderson@greatermngas.com).

Sincerely,

GREATER MINNESOTA GAS, INC.

/s/  
Kristine A. Anderson  
Corporate Attorney

Enclosure

cc: Service List

# **CERTIFICATE OF SERVICE**

I, Kristine Anderson, hereby certify that I have this day served a true and correct copy of the following document to all persons at the addresses indicated on the attached list by electronic filing, electronic mail, or by depositing the same enveloped with postage paid in the United States Mail at Le Sueur, Minnesota:

**Comments of Greater Minnesota Gas, Inc.  
E,G999/CI-19-160**

filed this 22<sup>nd</sup> day of March, 2019.

/s/ Kristine A. Anderson  
Kristine A. Anderson, Esq.  
Corporate Attorney  
Greater Minnesota Gas, Inc.

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street  Bismarck, ND 585014092	Electronic Service	No	OFF_SL_19-160_Official
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Laura	Demman	laura.demman@nngco.com	Northern Natural Gas Company	1111 S. 103rd Street  Omaha, NE 68125	Electronic Service	No	OFF_SL_19-160_Official

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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**STATE OF MINNESOTA**  
**BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

Nancy Lange  
Dan Lipschultz  
Matt Schuerger  
Katie Sieben  
John Tuma

Chair  
Commissioner  
Commissioner  
Commissioner  
Commissioner

MPUC Docket No. E,G999/CI-19-160

**In the Matter of a Commission  
Inquiry into the Impact of  
Severe Weather in January and  
February 2019 on Utility  
Operations and Service**

**COMMENTS OF  
GREATER MINNESOTA GAS, INC.**

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**OVERVIEW**

Greater Minnesota Gas, Inc. (“GMG”) submits these Comments in response to the Notice of Comment Period (“Notice”) issued by the Minnesota Public Utilities Commission (“Commission”) in the above-referenced docket on March 18, 2019. The Notice requires all utilities to provide information regarding the impact that the cold weather event in January and February, 2019 had on their operations and lessons learned that can be used to enhance system reliability and safety in the future.

**ISSUE SUMMARY**

GMG provides requested information herein regarding the following aspects of the Notice:

- A report on curtailment activity during the period.
- Analysis regarding conveying messages to the public during extreme weather events.
- A discussion of the lessons learned the will inform preparation for a similar weather event.

**DISCUSSION**

The cold weather event in January and February, 2019 presented Minnesota’s energy utilities with conditions that they had not faced in decades. Despite bitter cold, excessive wind, and unusual customer usage patterns, GMG did not experience major difficulties and it was prepared for the few things that arose. GMG’s portfolio (including its reserve margin), supplemental staffing, and general resource allocation ensured that its customers did not experience energy problems during the extreme cold.

**1. GMG's Affected Interruptible Customers Complied With Its Curtailment Request.**

As weather forecasts predicted the severe nature of an approaching extreme weather event, GMG determined that it would likely need to curtail interruptible customers. It provided notice to those customers in advance regarding the likelihood of curtailment and engaged the customers in discussion about preparation for the same as the customers wished. Every customer that GMG curtailed stopped using natural gas for the period that GMG asked them to stop. As GMG explained during the Commission's February 28, 2019 Planning Meeting, the majority of the customers that GMG curtailed were grain drying facilities and, as such, would not generally have been using significant gas load at that time of year. Since all of GMG's affected customers curtailed for their respective requested curtailment periods, penalty charges were not implicated and no root cause analysis is necessary.

**2. Utilities are in the Best Position to Communicate With Customers Regarding Energy Impacts During Extreme Weather Events.**

GMG appreciates the Commission's interest in how it could help convey messages to the public during an extreme weather event. However, GMG believes that the utilities are closest to the situation and in the best position to know what is happening and what any likely impacts will be to their particular customers. As demonstrated by the variety of impacts felt by customers of different utilities during the most recent cold weather event, different messages may – and most likely will – be appropriate for different sets of customers. General messaging could be confusing to the public, particularly when it might appear to be of an official nature such as that delivered by a state commission, because it may not be universally applicable. It would be almost impossible for the Commission to craft a message that would be appropriately tailored to all utility customers. Since the communication process with customer generally worked fine during the recent extreme weather conditions, GMG supports leaving the process of customer communication up to the individual utilities.

**3. The Knowledge Gleaned From the Recent Extreme Weather Event Will Inform Future Planning and Readiness Efforts.**

GMG is generally satisfied with its performance, and that of its system, during the January and February cold weather event. During what was literally a once-in-decades weather event, GMG's customers continued to receive sufficient, reliable, and safe natural gas service. Nonetheless, the situation provided and/or confirmed information about various aspects of GMG's systems. While GMG did not experience an excess flow valve failures, EFVs can fail when a line operates at ten pounds of pressure or less and other utilities experience EFV failures; hence, GMG will be alert to that potential during future weather events. Similarly, four of GMG's customers experienced brief service interruptions due to the failure of a regulator or meter. Due to the staff supplementation and prestocking of technician vehicles, GMG staff was able to promptly respond and address the failures in a timely manner, thereby minimizing the customer impact. GMG will continue with similar resource planning in the face of future



extreme weather. GMG maintained very close and detailed observation of the gas pressure throughout its system during the cold weather event. GMG identified areas in system that need reinforcement (which had already been planned for in the 2019 capital budget) and will undertake necessary reinforcement activities to reduce risk during future extreme weather.

GMG believes that the extreme winds and customer behavior during the sustained cold contributed to the fact that GMG actual's throughput exceeded its design day projections. However, GMG's philosophy regarding its modeling and the level of its reserve margin was validated as, even with use exceeding design day predictions, its reserve margin was still sufficient to protect its customers and assure sufficient firm gas supply.

On the whole, GMG and other utilities provided millions of Minnesota customers reliable gas service during one of the most extreme weather events in recent history. While there is always room for improvement, the overall system operated as intended. While GMG anticipates that each utility will use what it learned from the experience of itself and others to enhance its internal processes, GMG does not believe that the Commission needs to or should take any steps to require changes in the utilities' practices. Minnesota's utilities demonstrated their overall competency and ability to protect Minnesota residents and their dedication to maintaining safe and reliable energy supply through a very challenging weather situation.

### **CONCLUSION**

The cold weather event in January and February, 2019 presented challenging conditions for all of Minnesota's energy utilities. GMG's planning and resource allocation led to its successful navigation of those challenges. GMG will benefit from the working knowledge it gained through the event to bolster its readiness for similar situations that might arise in the future.

Dated: March 22, 2019

Respectfully submitted,

/s/

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