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December 6, 2019

Mr. Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 East Seventh Place, Suite 350
St. Paul, MN 55101-2147

RE: Compliance Filing
Great Plains Natural Gas Co.
Gas Service Quality Report 2018
Docket No. G004/M-19-280

Dear Mr. Wolf:

Great Plains Natural Gas Co. (Great Plains), a Division of Montana-Dakota Utilities Co., herewith electronically files its Compliance Filing regarding recommendations for the uniform reporting of excess flow valves (EFV) and manual shutoff valve installations on Great Plains' distribution system as required by the Commission's November 14, 2019 in Docket No. G-004/M-19-280 (November 14 Order).

The Commission's November 14 Order accepted Great Plains' 2018 Gas Service Quality Report and required certain information to be provide in future reports including "uniform reporting metrics for the installation of excess flow valves (EFV) and manual shutoff valves." In order to develop these uniform reporting metrics, the Commission requested that the Company "after consultation with the other gas utilities obligated to report EFV metrics, shall provide recommendations for uniform reporting of annual and overall EFV and manual shutoff valve installation on their distribution system." The November 14 Order required utilities to provide recommendations for unified reporting requirements to the Commission by December 6, 2019. The Commission stated that the recommendations should address the following issues:

1. A uniform definition of the number of customers suitable for EFV
2. A uniform definition of the number of customers suitable for manual shut-off valves
3. A uniform metric to be reported as a percentage of customers with installations of both
4. Metrics for the number of customers receiving installations upon request prior to a system upgrade that would require the installation of EFVs

After consulting with and reaching agreement with CenterPoint Energy, Minnesota Energy Resources Corporation, and Xcel Energy, Great Plains provides the following recommendations to address the Commission's Order:

- *Definition of number of customer suitable for EFV:*

A customer is suitable for an EFV if they fall under the installation requirements of 49 CFR § 192.383, which is having a service operated at least 10 pounds per square inch gauge and serve a customer load not greater than 1,000 standard cubic feet per hour (SCFH).

However, if an appropriately sized EFV is available Great Plains will install an EFV on a service line serving a load greater than 1,000 SCFH. The actual number of customers (or services) with technical feasibility for an EFV installation may vary since an engineering analysis is required, on a case-by-case basis, to determine actual technical feasibility.

- *Definition of the number of customers suitable for manual shut-off valves:*

A customer is suitable for a manual shut-off valve if they do not meet the requirements of 49 CFR § 192.383.

- *Metric to address percentage of customers with valve installations and number of customers requesting a valve installation:*

The above referenced natural gas companies recommend the following uniform metrics to report the percentage of customers with installations of EFVs and manual shut-off valves; and the number of customers receiving installations upon request prior to a system upgrade:

EFV Installation

Number of Customers Suitable for EFV Installation ¹ (a)	Total Number of Installed EFVs (b)	Number of Customers Who Requested Installation ² (c)	Percentage of Suitable Customers with EFVs (d)	Number of Customers Unsuitable for EFVs ³ (e)
		(subset of (b))	(b)/(a)	

Manual Shut-Off Installation

Number of Customers Suitable for Manual Shut-Off Valves ⁴ (a)	Total Number of Installed Manual Shut-Off Valves ⁵ (b)	Number of Customers Who Requested Installation ⁶ (c)	Percentage of Suitable Customers with Manual Shut-Off Valves (d)
		(subset of (b))	(b)/(a)

¹ A customer is suitable for an EFV if they fall under the installation requirements of 49 CFR § 192.383 which is having a service operated at least 10 pounds per square inch gauge and serve a customer load not greater than 1,000 standard cubic feet per hour. If an appropriately sized EFV is available, Great Plains will install an EFV on a service line serving a load greater than 1,000 standard cubic feet per hour. The actual number of services technical feasibility for an EFV installation may vary since an engineering analysis is required, on a case-by-case basis, to determine technical feasibility.

² Since August 20, 2018, which is the date of the Commission's Order Finding that Excess Flow Valves Comply with Federal Regulations and Taking Other Actions in Docket No. G-999/CI-18-41.

³ A customer unsuitable for an EFV may be suitable for a manual shut-off valve.

⁴ A customer is suitable for a manual shut-off valve if they do not meet the requirements of 49 CFR § 192.383.

⁵ In Column (b) Manual Shut-Off Installation, Great Plains is reporting the total number of Installed Manual Shut-off Valves' pertaining to years 2017 and beyond as reported in the 7100 report.

⁶ Since August 20, 2018 which is the date of the Commission's Order Finding that Excess Flow Valves Comply with Federal Regulations and Taking Other Actions in Docket No. G-999/CI-18-41.

In agreeing to these metrics, the above referenced natural gas utilities noted that because of the difference in how records are maintained and can be pulled from electronic systems, each utility will have to define for the Commission how they count the "number of customers" for the purposes of reporting metrics. Each natural gas utility proposes to describe how it derived its "number of customers" for purposes of this report in its Annual Natural Gas Service Quality Report.

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

Sincerely,

/s/ Tamie A. Aberle

Tamie A. Aberle
Director of Regulatory Affairs