

May 10, 2021

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, Minnesota 55101

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket Nos. G004/M-19-280, G008/M-19-300, G011/M-19-303, G002/M-19-305

Dear Mr. Seuffert,

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources pursuant to the Minnesota Public Utilities Commission's April 30, 2020 Notice of Comment Period in the above-referenced dockets.

The Department recommends that the Minnesota Public Utilities Commission (Commission) accept the December 6, 2019 compliance filings of Great Plains Natural Gas Company, CenterPoint Energy Minnesota Gas, Minnesota Energy Resources Corporation, and Xcel Energy Gas and find that these compliance filings satisfy the relevant Commission directives and orders. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ GEMMA MILTICH
Financial Analyst, CPA

GM/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket Nos. G004/M-19-280, G008/M-19-300, G011/M-19-303, G002/M-19-305

I. BACKGROUND

At the October 24, 2019 Minnesota Public Utilities Commission (Commission) Agenda Meeting, the Commission met and considered the 2018 Gas Service Quality Reports in Docket Nos. G004/M-19-280, G008/M-19-300, G011/M-19-303, and G002/M-19-305 (collectively, the 2018 Service Quality Dockets).

Following the October 24, 2019 Agenda Meeting, the Commission issued *Orders* in each of the 2018 Service Quality Dockets requiring Great Plains Natural Gas Company (Great Plains), CenterPoint Energy Minnesota Gas (CenterPoint), Minnesota Energy Resource Corporation (MERC), and Xcel Energy Gas (Xcel) to file by December 6, 2019 recommendations for uniform reporting metrics for excess flow valve (EFV) and manual service line shutoff valve installations.¹ The Commission's *Orders* required that the four gas utilities consult with one another to develop their recommendations for uniform EFV and manual shutoff valve reporting. The gas utilities each submitted the required compliance filings on December 6, 2019 in their respective service quality dockets.

On April 30, 2021, the Commission issued a Notice for Comments with the following topic open for comment:

- Do the Compliance Filings of December 6, 2019 addressing uniform reporting requirements satisfy the Commission's orders?

The instant comments address the Commission's April 30, 2021 Notice for Comments.

II. DEPARTMENT ANALYSIS

The Minnesota Department of Commerce, Division of Energy Resources (Department) reviewed the December 6, 2019 compliance filings of Great Plains, CenterPoint, MERC, and Xcel in Docket Nos. G004/M-19-280, G008/M-19-300, G011/M-19-303, and G002/M-19-305, respectively, to determine whether these compliance filings satisfy the Commission's requirement for these gas utilities to develop and recommend uniform reporting metrics for EFVs and manual shutoff valves.

¹ See the Commission's November 14, 2019 *Orders* in Docket Nos. G004/M-19-280, G008/M-19-300, and G002/M-19-305 and the Commission's January 7, 2020 *Order* in Docket No. G011/M-19-303, for MERC. While the Commission's *Order* for MERC was not issued until after the December 6, 2019 filing deadline, MERC submitted the required information on December 6, 2019 pursuant to the Commission's oral order at the October 24, 2019 Agenda Meeting.

In its *Orders* in each of the 2018 Service Quality Dockets, the Commission required Great Plains, CenterPoint, MERC, and Xcel to develop and recommend uniform reporting metrics for EFV and manual shutoff valve installations as follows:

By December 6, 2019, after consultation with the other gas utilities obligated to report EFV metrics, [gas utilities] shall provide recommendations for uniform reporting of annual and overall EFV and manual shutoff valve installation on their distribution system. The recommendation could include:

- a. uniform definition of the number of customers suitable for EFV;
- b. uniform definition of the number of customers suitable for manual shut-off valves;
- c. uniform metric to be reported as a percentage of customers with installations of both;
- d. metrics for the number of customers receiving installations upon request prior to a system upgrade that would require the installation of EFVs.

In their December 6, 2019 compliance filings, Great Plains, CenterPoint, MERC, and Xcel recommended the following in response to the Commission's directives concerning uniform reporting metrics for EFV and manual shutoff valve installation:²

- **A uniform definition of the number of customers suitable for EFV:** The gas utilities explained that a customer is suitable for an EFV if they fall under the installation requirements of 49 CFR §192.383,³ which means having a service that is operated with at least a 10 pounds per square inch gauge and serving a customer load not greater than 1,000 standard cubic feet per hour (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.⁴

² Note that the information contained in the following bulleted discussion was retrieved from the first 3 to 4 pages of each of the utilities December 6, 2019 filings (G004/M-19-280, G008/M-19-300, G011/M-19-303, and G002/M-19-305).

³ [49 CFR §192.383](#)

⁴ Great Plains also noted, on page 2 of its December 6, 2019 compliance filing in Docket No. G004/M-19-280, "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."

- **A uniform definition of the number of customers suitable for manual shutoff valves:** The gas utilities explained that a customer is suitable for a manual shutoff valve if they do not meet the requirements of 49 CFR §192.383.
- **A uniform metric to be reported as a percentage of customers with installations of EFVs and manual shutoff valves:** The gas utilities recommend that the percentage of customers with EFV installations be calculated as the total number of EFVs installed divided by the total number of customers suitable for an EFV installation. Similarly, the gas utilities recommend that the percentage of customers with manual shutoff valve installations be calculated as the total number of manual shutoff valves installed divided by the total number of customers suitable for a manual shutoff valve. Customer EFV and manual shutoff valve suitability would be based on the definitions recommended in the first and second bullet points in this list, respectively.
- **Metrics for the number of customers receiving installations upon request prior to a system upgrade that would require the installation of EFVs:** The gas utilities indicated that the number of customers receiving EFV installations upon request would be a subset of the total number of EFVs installations. The utilities noted that EFV installations executed upon customer request would fall after 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. G999/CI-18-41.

Great Plains, CenterPoint, MERC, and Xcel noted that, due to the variability in how records are maintained and retrieved from the different utilities' electronic systems, each gas utility needs to define for the Commission how they will count the number of customers for the recommended EFV and manual shutoff valve reporting metrics. The utilities propose to include in their respective annual natural gas service quality reports a description of how they counted the number of customers for EFV and manual shutoff valve reporting.

The Department concludes that the December 6, 2019 compliance filings of Great Plains, CenterPoint, MERC, and Xcel in the 2018 Service Quality Dockets satisfy the Commission's directives at the October 24, 2019 Agenda Meeting and the corresponding *Orders*. We recommend that the Commission accept the gas utilities' December 6, 2019 compliance filings.

IV. DEPARTMENT CONCLUSIONS AND RECOMMENDATIONS

The Department concludes that the December 6, 2019 compliance filings of Great Plains, CenterPoint, MERC, and Xcel in the 2018 Service Quality Dockets satisfy the Commission's directives at the October 24, 2019 Agenda Meeting and the corresponding *Orders*. We recommend that the Commission accept the utilities' December 6, 2019 compliance filings.

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. G004/M-19-280, G008/M-19-300, G011/M-19-303, and
G002/M-19-305**

Dated this 10th day of May 2021

/s/Sharon Ferguson

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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-280_M-19-280
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_19-280_M-19-280
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-280_M-19-280
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-280_M-19-280

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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-305_M-19-305
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Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-305_M-19-305

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