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May 1, 2020

VIA ELECTRONIC FILING

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

**PUBLIC DOCUMENT
PRIVATE DATA ON INDIVIDUALS
HAS BEEN EXCISED**

**Re: In the Matter of the Annual Service Quality Report for Minnesota
Energy Resources Corporation for 2019**

Docket No. G011/M-20-____

Dear Mr. Seuffert:

Enclosed for filing is Minnesota Energy Resources Corporation's ("MERC's") 2019 Gas Service Quality Report. The nonpublic version of this filing contains private data on individuals. In particular, Attachments 9-A and 10 include 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.

Please contact me at (414) 221-4208 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Joylyn C. Hoffman Malueg". The signature is written in a cursive, flowing style.

Joylyn C. Hoffman Malueg
Project Specialist 3
Minnesota Energy Resources Corporation

Enclosures
cc: Service List

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

Katie J. Sieben
Valerie Means
Matthew Schuerger
Joseph K. Sullivan
John A. Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

In the Matter of the Annual Service
Quality Report for Minnesota Energy
Resources Corporation for 2019

Docket No. G011/M-20-____

2019 ANNUAL SERVICE QUALITY REPORT

Minnesota Energy Resources Corporation (“MERC” or the “Company”) submits this Gas Service Quality Report for 2019 in compliance with Minn. R. Part 7826 and the Minnesota Public Utilities Commission’s (the “Commission”) January 7, 2020, Order Accepting Report and Setting Future Reporting Requirements in Docket No. G011/M-19-303.¹

In the Commission’s October 31, 2016, Findings of Fact, Conclusions, and Order in Docket No. G011/GR-15-736, the Commission required that MERC develop, in consultation with the Minnesota Department of Commerce, Division of Energy Resources (the “Department”) and the Minnesota Office of the Attorney General—Residential Utilities Division (the “OAG”), a tool or survey to measure the effectiveness over time of the Improved Customer Experience (“ICE”) Project as it relates to the customer services that were intended to be improved by the project.² The Commission further ordered that the Company report on its performance toward the identified benchmarks with MERC’s annual gas service quality reporting.

This annual Gas Service Quality Report represents the third year in which MERC is reporting on its achievements with respect to the ICE Performance Indicators.³ When

¹ This report also incorporates requirements set forth in the following orders: August 26, 2010, Order Setting Reporting Requirements in Docket No. G999/CI-09-409; March 6, 2012, Order Accepting Reports and Setting Further Requirements in Docket No. G007,011/M-10-374; October 23, 2015, Order in Docket No. G011/M-15-410; October 31, 2016, Findings of Fact, Conclusions, and Order in Docket No. G011/GR-15-736; February 9, 2018, Order in Docket Nos. G011/M-16-371 and G011/M-17-343; and April 12, 2019, Order in Docket No. G011/M-18-317.

² *In the Matter of the Application of Minn. Energy Res. Corp. for Auth. to Increase Rates for Nat. Gas Serv. in Minn.*, Docket No. G011/GR-15-736, FINDINGS OF FACT, CONCLUSIONS, AND ORDER at 55, Order Point 11 (Oct. 31, 2016).

³ In January 2017, MERC, the Department, and the OAG reached agreement regarding ten specific “Performance Indicators” to be used beginning in 2017 to measure the effectiveness of ICE, in addition to the service quality measures already reported on in MERC’s annual gas service quality report. *In the Matter of the Application of Minn. Energy Res. Corp. for Auth. to Increase Rates for Nat. Gas Serv. in*

considering the overall Performance Indicators associated with the ICE Project, MERC has met or exceeded many of the identified metrics for calendar year 2019, continuing to demonstrate the overall effectiveness of the ICE Project in achieving improved customer service and delivering on the specific areas of customer service intended to be improved by ICE. While factors unrelated to the ICE Project negatively impacted some of MERC's 2019 Performance Indicators, as reflected in this filing, those factors do not undermine a conclusion that MERC has demonstrated the effectiveness over time of the ICE Project as it relates to the customer services that were intended to be improved by the project. MERC has demonstrated that the benchmarks have been met for the Company to retain the \$500,000 set aside, in accordance with the Commission's October 31, 2016, Findings of Fact, Conclusions, and Order issued in Docket No. G011/GR-15-736.

Additionally, because MERC's 2017, 2018, and 2019 ICE performance metrics indicate that the ICE Project has achieved its stated objectives in improving customer service, MERC requests that the Commission determine that ongoing monitoring and reporting is no longer necessary, and that the \$500,000 no longer needs to be set aside as a performance incentive. Now that ICE has been fully implemented, further significant improvements stemming directly from the ICE Project in the identified performance measures is not anticipated, although incremental improvements in some areas may continue. MERC believes it has demonstrated improvements with respect to the identified ICE Performance Indicators and has fully explained areas where factors outside of the ICE Project have and will continue to impact overall performance.

This filing also addresses compliance with the Commission's January 7, 2020, Order Accepting Report and Setting Future Reporting Requirements issued in Docket No. G011/M-19-303. In particular, the Commission's Order required MERC to file, in its future Gas Service Quality Reports:

- a. Based on the utility's filing under 49 C.F.R. 192.1007(e) and the baseline information provided on May 1, 2019, an update of: integrity management plan performance measures; monitoring results; and evaluation of effectiveness.
- b. A summary of any emergency response violations cited by the Minnesota Office of Pipeline Safety ("MNOPS") along with a description of the violation and remediation in each circumstance.
- c. The number of violation letters received by the utility from MNOPS during the year in question.
- d. The uniform reporting metrics for installation of excess flow valves ("EFV") and manual service line shut-off valves to be developed as follows: By December 6, 2019, after consultation with the other gas utilities obligated to report EFV metrics, MERC shall provide recommendations for uniform reporting of annual and overall EFV manual shutoff valve installation on its distribution system. The recommendation could include:
 - i. A uniform definition of the number of customers suitable for EFV;

Minn., Docket No. G011/GR-15-736, COMPLIANCE FILING—IMPROVED CUSTOMER EXPERIENCE (ICE) PROJECT FILING (Jan. 31, 2017).

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

Further, this filing addresses compliance with the Commission's January 7, 2020, Order Setting Reporting Requirements issued in Docket No. G011/M-19-303. In particular, the Commission's Order required MERC to file, in its future Gas Service Quality Reports transmission integrity management programs ("TIMP") and distribution integrity management programs ("DIMP") data on the following metrics:

- a. Leak Count by Facility Type and Threat:
 - i. Total Count by Cause – Above Ground
 - ii. Total Count by Cause – Mains
 - iii. Total Count by Cause – Services
- b. Leak Count on Main by Material
- c. Leak Count on Service by Material

MERC respectfully requests that the Commission issue an Order accepting the Company's 2019 Gas Service Quality Report, authorizing the Company to retain the \$500,000 set-aside related to ICE, and authorizing MERC to discontinue future reporting on ICE performance metrics. Each of the service quality and ICE metrics is described and analyzed below.

A. Call Center Response Time

Each utility is required to report call center response times in terms of the percentage of calls answered within 20 seconds.

MERC Response: The required information is provided in Attachment 1. As demonstrated in that Attachment and in Table 1, below, MERC's average call response time for 2019 was 22 seconds for customer service calls. The increase over 2018 results is due to fall 2019 call volumes being higher than normal, with performance in September and October impacting the yearly average. MERC addressed these performance gaps by developing and implementing call center improvement actions for the remainder of the year, which resulted with significant reductions in average speed to answer, as shown in Attachment 1.

Table 1: Average Call Center Response Times 2010 – 2019

Year	Average Response Time
2010	17 seconds
2011	18 seconds
2012	20 seconds
2013	19 seconds
2014	36 seconds
2015	28 seconds
2016	38 seconds
2017	15 seconds
2018	20 seconds
2019	22 seconds

B. Meter Reading Performance Data

Each utility is required to report the meter reading performance data contained in Minn. R. 7826.1400. Pursuant to that rule, the annual service quality report must include a detailed report on the utility's meter-reading performance, including for each customer class and for each calendar month:

- A. the number and percentage of customer meters read by utility personnel;
- B. the number and percentage of customer meters self-read by customers;
- C. the number and percentage of customer meters that have not been read by utility personnel for periods of six to 12 months and for periods of longer than 12 months, and an explanation as to why they have not been read; and
- D. data on monthly meter-reading staffing levels, by work center or geographical area.

MERC Response: The required information is provided in Attachments 2 and 2-A.

In its March 6, 2012, Order Accepting Reports and Setting Further Reporting Requirements issued in Docket No. G007,011/M-10-374, the Commission also requested utilities to explain in their annual reports whether the difference between the total percentage of meters (100%) and the percentage of meters read (by both the utility and the customers) is equal to the percentage of estimated meter reads.

The percentage of meters read (by both the utility and the customers) is equal to 93.2%. The difference between the meters read and total percentage of meters (100%) is 6.8%. Estimated meter reads are 4.9% of total meters, comprising the majority of this 6.8% difference.

Consistent with MERC's response in past Gas Service Quality Reports, Attachment 2-A to this 2019 Gas Service Quality Report accounts for meter reading staffing based on payroll time charged to meter reading for MERC employees and full-time-equivalent ("FTE") staffing for MERC contract meter readers.

MERC's 2019 meter reading performance has continued to be strong and is consistent with prior reporting years with well below one percent of meters not being read over six or twelve months. For 2019, MERC's meter reading staffing levels were somewhat higher than 2018, as reflected in Table 2, below:

Table 2: Meter Reader FTE 2015 – 2019

Year	FTE Meter Readers (internal and contract)
2015	32.50
2016	31.47
2017	30.72
2018	32.92
2019	35.84

C. Involuntary Service Disconnections

In lieu of reporting data on involuntary service disconnections as stated in Minn. R. 7826.1500, each utility shall reference the data that it submits under Minn. Stat. §§ 216B.091 and 216B.096.

MERC Response: MERC refers to its monthly reports filed with the Commission under Minn. Stat. §§ 216B.091 and 216B.096, and attached to this report as Attachment 3. In particular:

1. The number of customers who received disconnection notices is reported in item 20 of MERC's monthly report.
2. The number of customers who sought Cold Weather Rule protection under Chapter 7820 is reported in item 3, and the number of customers who sought Cold Weather Rule protection and whose service was disconnected is provided in item 22 of MERC's monthly report.
3. The total number of customers whose service was disconnected involuntarily is provided in item 23 of MERC's monthly report, and the number of customers whose service was disconnected for 24 hours or more is reported in item 34.
4. The number of customer accounts granted a reconnection request are reported in item 6 of MERC's monthly report.

As discussed in MERC's 2016, 2017, and 2018 Gas Service Quality Reports, MERC temporarily suspended disconnection activity during the transition to its new ICE system

and during the period of system stabilization. As a result, MERC's 2016 disconnection rates were lower than prior years. The suspension of credit and collection activities during a customer information system 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 reinitiated. MERC reinitiated its disconnection process in the latter part of 2016 and, as shown in Table 3, below, 2017 disconnection rates increased from 2016 levels. In 2018 and continuing into 2019, disconnections returned to being more in line with historic levels.

Table 3: Residential Disconnections (2011-2019)

Year	Disconnection Notices Sent	# of CWR requests	% of CWR Granted	Involuntary Disconnects	% Restored in 24 Hours
2011	62,880	4,678	100%	7,944	51.86%
2012	55,611	5,407	100%	6,358	90.42%
2013	71,491	6,058	100%	8,487	81.34%
2014	87,069	7,014	100%	6,801	88.08%
2015	71,061	8,748	100%	5,393	48.23%
2016	2,690	4,649	100%	782	37.58%
2017	37,208	8,751	100%	1,744	81.36%
2018	58,151	10,014	100%	3,438	69.60%
2019	55,276	8,693	100%	4,961	83.98%

D. Service Extension Requests

Each utility shall report the service extension request response time data contained in Minn. R. 7826.1600 (A)-(B), except that data reported under Minn. Stat. §§ 216B.091 and 216B.096, subd. 11, is not required.

7826.1600 REPORTING SERVICE EXTENSION REQUEST RESPONSE TIMES.

The annual service quality report must include a report on service extension request response times, including, for each customer class and each calendar month:

- A. the number of customers requesting service to a location not previously served by the utility and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service; and
- B. the number of customers requesting service to a location previously served by the utility, but not served at the time of the request, and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service.

MERC Response: The required information is provided in Attachment 4. “New installs” represent new service requests at locations where no gas service exists, either because the location is new construction or because an alternate fuel source has been used there previously. “Existing” installs represent any building that has previously had natural gas service, but the service has been disconnected.

MERC notes that the negative number reported for February indicates the service installation was completed before the date the customer requested.

For locations not previously served, new service requests are either related to customers with new construction or customers requesting service to convert to natural gas. For locations previously served, new service requests consist of requests to turn on service after the service was disconnected at the previous customer’s request. Reconnections occurring after disconnections for non-payment are not included in MERC’s response.

E. Customer Deposits

Pursuant to Minn. R. 7826.1900, each utility shall report the number of customers who were required to make a deposit as a condition of receiving service.

In its March 6, 2012, Order Accepting Reports and Setting Further Reporting Requirements issued in Docket No. G007,011/M-10-374, the Commission also requested utilities explain the types of deposits included in the reported number of “required customer deposits.”

MERC Response: MERC collected 0 new deposits in 2019 as a condition to receive service. In total, MERC was holding 24 deposits at the end of 2019.

As discussed in MERC’s July 30, 2018, Reply Comments filed in the Company’s 2017 Gas Service Quality Report docket, Docket No. G011/M-18-317, in late 2017, MERC discovered that it collected deposits from low-income customers in violation of the Company’s policy, and the deposits collected were higher than allowed under MERC’s tariff. Upon realizing the mistake, the Company refunded all residential deposits collected in 2017. MERC also suspended collection of deposits in 2017, and that trend continued into 2018 and 2019.

F. Customer Complaints

Each utility shall report the customer complaint data by customer class and calendar month, as required under Minn. R. 7826.2000, including:

- A. the number of complaints received;
- B. the number and percentage of complaints alleging billing errors, inaccurate metering, wrongful disconnection, high bills, inadequate service, and the number involving service-extension intervals, service-restoration intervals, and any other

identifiable subject matter involved in five percent or more of customer complaints;

C. the number and percentage of complaints resolved upon initial inquiry, within ten days, and longer than ten days;

D. the number and percentage of all complaints resolved by taking any of the following actions:

- (1) taking the action the customer requested;
- (2) taking an action the customer and the utility agree is an acceptable compromise;
- (3) providing the customer with information that demonstrates that the situation complained of is not reasonably within the control of the utility; or
- (4) refusing to take the action the customer requested; and

E. the number of complaints forwarded to the utility by the commission's Consumer Affairs Office for further investigation and action.

MERC Response: See Attachment 5 to this filing. Attachment 5 also includes MERC's customer complaint report filed annually pursuant to Minnesota Rule 7820.0500. MERC notes that overall, the number of complaints received in 2019 is lower than the number of complaints received in 2017 and 2018. In 2017, as part of ICE, MERC changed the Company's methodology used to track complaints, and continued implementation of and training on the updated methodology in 2018. Specifically, MERC provided significant training to call center representatives to help identify when customers are not satisfied and to recognize when customers call multiple times. In these instances, a call center supervisor performs a call back and all call backs are tracked as a complaint. As can be seen in Table 4, below, the 2017 change in MERC's complaint tracking complicates year-to-year historical comparisons. However, in the long-run, it will be beneficial to use a consistent methodology that comprehensively identifies all inquiries and appropriately categorizes customer complaints.

Table 4: Customer Complaints (2015-2019)

Year	2015	2016	2017	2018	2019
# of Complaints	454	577	1,547	1,883	1,199

G. Telephone Answer Times

Each utility shall report data on telephone answer times to its gas emergency phone line calls.

MERC Response: The required information is provided in Attachment 6.

H. Mislocates

Each utility shall report data on line mislocates, including the number of times a line is damaged due to a mismarked line or failure to mark a line.

MERC Response: The required information is provided in Attachment 7.

I. Damaged Gas Lines

Each utility shall report data on the number of gas lines damaged. The damage shall be categorized according to whether it was caused by the utility's employees or contractors, or whether it was due to any other unplanned cause.

MERC Response: The required information is provided in Attachment 8.

J. Service Interruptions

Each utility must report data on service interruptions. Each interruption shall be categorized according to whether it was caused by the utility's employees or contractors, or whether it was due to any other unplanned cause. Utilities must provide the number of customers affected by the service interruption and the average duration of the interruptions.⁴

MERC Response: The required information is provided in Attachments 9 and 9A. MERC calculates total outage time beginning when the outage is reported and ending when gas is available to relight the appliances. The nonpublic version of Attachment 9A 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.

As shown in Attachments 9 and 9A, and summarized in Attachment 10, August had an outage that impacted a large number of customers. In August 2019, 216 customers were impacted by a single event that resulted from a severe thunderstorm blowing a tree down and into MERC's regulator station.

K. MNOPS Reportable Events, Integrity Management Plan, and Excess Flow Valve Reporting

Each utility shall report summaries of major events that are immediately reportable to the MNOPS according to the criteria used by MNOPS to identify reportable events. Each utility shall also provide summaries of all service interruptions caused by system integrity pressure issues. Each summary shall include the following ten items:

⁴ See *In the Matter of the Annual Serv. Quality Report for Minn. Energy Res. Corp. for 2010*, Docket No. G007,011/M-10-374, ORDER ACCEPTING REPORTS AND SETTING FURTHER REQUIREMENTS at 3 (Mar. 6, 2012).

- the location;
- when the incident occurred;
- how many customers were affected;
- how the company was made aware of the incident;
- the root cause of the incident;
- the actions taken to fix the problem;
- what actions were taken to contact customers;
- any public relations or media issues;
- whether the customer or the company relighted; and
- the longest any customer was without gas service during the incident.

In addition, in the Commission's January 7, 2020, Order Accepting Report and Setting Future Reporting Requirements issued in Docket No. G011/M-19-303, the Commission Ordered MERC to file the following:

- a. Based on the utility's filing under 49 C.F.R. 192.1007(e) and the baseline information provided on May 1, 2019, an update of: integrity management plan performance measures; monitoring results; and evaluation of effectiveness.
- b. A summary of any emergency response violations cited by MNOPS along with a description of the violation and remediation in each circumstance.
- c. The number of violation letters received by the utility from MNOPS during the year in question.
- d. Uniform reporting metrics for installation of EFVs and manual service line shut off valves, to be developed in consultation with the other gas utilities and to include:
 - i. A uniform definition of the number of customers suitable for EFV;
 - ii. A uniform definition of the number of customers suitable for manual shut-off valves;
 - iii. A uniform metric to be reported as a percentage of customers with installations of both;
 - iv. Metrics for the number of customers receiving installations upon request prior to a system upgrade that would require the installation of EFV.

Additionally, in the Commission's January 7, 2020, Order Setting Reporting Requirements issued in Docket No. G011/M-19-303, the Commission Ordered MERC to file the following TIMP and DIMP data by the following metrics:

- a. Leak Count by Facility Type and Threat:
 - i. Total Count by Cause – Above Ground
 - ii. Total Count by Cause – Mains
 - iii. Total Count by Cause – Services
- b. Leak Count on Main by Material
- c. Leak Count on Service by Material

MERC Response: The required information regarding MNOPS reportable events is provided in Attachment 10. The nonpublic version of Attachment 10 includes “private data on individuals,” such as customer addresses. This information is maintained by MERC as private customer data, and has been excised from the public version of this filing pursuant to Minn. Stat. § 13.679.

MERC was not cited for any emergency response violations by MNOPS during 2019.

With respect to the number of violation letters received from MNOPS during the year in question, Table 5, below, provides the number of violation letters MERC received from MNOPS during 2019, categorized by type.

Table 5: MNOPS Violation Letters (2019)

Category	# of violation letters received
Locating Underground Facility	4 (notices of probable violation)

Attachment 11 provides an update of MERC’s integrity management plan performance measures, monitoring results, and evaluation of effectiveness required under Title 49 C.F.R. § 192.1007(e) for 2019, relative to the baseline reported in the Company’s May 1, 2019, Gas Service Quality Report.

Section 192.1007(e) requires operators to develop and monitor performance measures from an established baseline to evaluate the effectiveness of its integrity management program, including the following: (1) number of leaks either eliminated or repaired, identified by cause and material; (2) number of excavation damages; (3) number of excavation tickets; and (4) additional measures the operator determines are needed to evaluate the effectiveness of the operator’s integrity management plan. The results of these performance measures are considered in MERC’s ongoing evaluation of threats and risks to its distribution system.

As reflected in Attachment 11, in addition to tracking data regarding hazardous leaks and other leaks eliminated or repaired by cause and material and number of excavation damages and excavation tickets, MERC has identified additional measures to evaluate the effectiveness of its integrity management plan as a result of risk evaluation and analysis. Those measures include external corrosion on all steel, atmospheric

corrosion on meter sets, emergency response times, and percentage of leaks eliminated or repaired within one year.

For each performance measure, the established baseline is identified and described in Attachment 11. The baseline for each measure is based on available data. For example, MERC has developed a ten-year baseline for leaks (2006-2015) and a five-year baseline with respect to excavation damages, excavation tickets, and the ratio of damages to excavation tickets. Attachment 11 also describes the effectiveness criteria for each performance measure, relative to the baseline, and provides data regarding 2019 results relative to the established baseline. The purpose of the performance metrics under 49 C.F.R. § 192.1007(e) is to allow gas system operators to evaluate the effectiveness of their integrity management programs relative to an established baseline in order to determine progress and identify the need for any accelerated action.

While these performance metrics guide MERC's ongoing evaluation of system integrity and risk, a deeper evaluation of the underlying data is necessary and important to understanding trends in increasing or diminishing effectiveness. MERC's integrity management risk analysis is an ongoing process of understanding what factors affect the risk posed by threats to the gas distribution system and which risks are relatively more important than others. The primary objectives in the evaluation and ranking of gas distribution system risks are to:

- Consider each applicable current and potential threat;
- Consider the likelihood of failure (frequency) associated with each threat;
- Consider the potential consequences of such a failure;
- Estimate and rank the risks posed to the distribution system; and
- Consider the relevance of threats in one location to other areas.

MERC's integrity management risk analysis incorporates factors beyond the data provided in Attachment 11 (i.e., leaks and excavation damages), including consequence, risk and consequence probability, and frequency (e.g., the relative percentage of leaks by cause to the total number of leaks for the system). While the identified effectiveness criteria provide a trigger for further investigation, a deeper analysis of the data is necessary to properly and fully evaluate risk and identify any appropriate actions to mitigate or address risks. Consequently, the Company is constantly reviewing risk and effectiveness and reprioritizing based on current data. Notably, as construction related to right-of-way relocation work, reliability, and integrity management has increased in recent years, so too has the available data and visibility into risks on MERC's system. For example, external corrosion that would not have been detected during a leak survey frequently is identified during construction projects, necessitating the excavation of a portion of the distribution system.

The Commission's January 7, 2020, Order Setting Reporting Requirements required that MERC annually file, as part of its natural gas service quality report, TIMP/DIMP data on leak count by facility type and threat; leak count on main by material; and leak count on service by material. In accordance with the Commission's January 7, 2020,

Order, Tables 6 and 7 below include data regarding leak count by facility type and threat; leak count on main by material, and leak count on service by material. Details regarding MERC's leak count by threat by facility type are included in Attachment 11.

Table 6: Categories 1-3 Leak Count Metrics (2019)

Metric	Count
Leak Count by Facility Type	
Total Count by Cause – Above Ground ⁵	1,643
Total Count by Cause – Mains ⁶	97
Total Count by Cause – Services ⁷	1,948
Leak Count on Main by Material ⁸	
Aluminum	0
Brass	0
Copper	0
Ductile/Wrought Iron	0
Gasket Material	8
Other	11
Other Plastic	4
Polyethylene (PE)	45
Steel – Bare	7
Steel - Coated	22
X-Trube	0
TOTAL	97
Leak Count on Service by Material ⁹	
Aluminum	42
Brass	8
Copper	3
Ductile/Wrought Iron	41
Gasket Material	529
Other	304
Other Plastic	20
Polyethylene (PE)	226
Steel – Bare	493
Steel - Coated	277
X-Trube	5
TOTAL	1,948

⁵ Includes above-ground main and service line leaks. Details regarding leak count by cause on above-ground main and service lines is included in Table 7 below.

⁶ Includes above-grade and below-grade leaks. See page 1 of 9 of Attachment 11 for additional information regarding leak causes.

⁷ Includes above-grade and below-grade leaks. See page 1 of 9 of Attachment 11 for additional information regarding leak causes.

⁸ Includes above-grade and below-grade leaks. See page 3 of 9 of Attachment 11.

⁹ Includes above-grade and below-grade leaks. See page 3 of 9 of Attachment 11.

Table 7: Leak Count by Cause – Above-Ground Facilities (2019)

Threat	Main	Service Line	Total
Corrosion	0	19	19
Equipment	3	877	880
Excavation	0	13	13
Material or Welds	0	131	131
Natural Forces	3	290	293
Operations	1	25	26
Other	3	213	216
Other Outside Force Damage	0	65	65
Total	10	1,633	1,643

With respect to EFVs and manual service line shut-off valves, the Commission's January 7, 2020, Order Accepting Report and Setting Future Reporting Requirements in Docket No. G011/M-19-303 required MERC, in consultation with the other gas utilities, to provide recommendations for a uniform reporting of annual and overall EFV manual shutoff valve installation on its distribution system.

On December 6, 2019, MERC submitted its compliance filing addressing proposed uniform definitions and reporting metrics with respect to EFV and manual shut-off valve installations. In that compliance filing, MERC, in consultation with the other natural gas utilities, agreed to the following definitions:

- Number of customers suitable for an EFV – a customer is suitable for an EFV if they fall under the installation requirements of 49 C.F.R. § 192.383, which requires the service line to be operated at least 10 pounds per square inch gauge and to serve a customer load not greater than 1,000 standard cubic feet per hour ("SCFH"). However, actual number of services eligible for installation of an EFV may vary since an engineering analysis is required, on a case-by-case basis, to determine actual technical feasibility.
- Number of customers suitable for manual shut-off valve – a customer is suitable for a manual shut-off valve if they do not meet the requirements of 49 C.F.R. § 192.383.

Additionally, the natural gas companies proposed uniform metrics to report the percentage of installations of EFVs and manual shut-off valves and the number of customers receiving installations upon request prior to a system upgrade. MERC reports on EFV and manual shut-off valve installations through 2019 in Tables 8 and 9 below, consistent with these uniform metrics.

Table 8: EFV Installation

Number of Customers Suitable for EFV Installation¹⁰ (a)	Total Number of Installed EFVs (b)	Number of Customers Who Requested Installation¹¹ (c)	Percentage of Suitable Customers with EFVs (d)	Number of Customers Unsuitable for EFVs¹² (e)
		(subset of (b))	(b)/(a)	
224,891	55,837	0	24.8%	4,771

Table 9: Manual Shut-Off Valve Installation

Number of Customers Suitable for Manual Shut-Off Valves¹³ (a)	Total Number of Installed Manual Shut-Off Valves (b)	Number of Customers Who Requested Installation¹⁴ (c)	Percentage of Suitable Customers with Manual Shut-Off Valves (d)
		(subset of (b))	(b)/(a)
4,771	195	0	4.1%

As noted in MERC's December 6, 2019, Compliance Filing, for purposes of reporting on eligibility, MERC assumes that for existing service lines, any service line that is 1 inch or smaller would be eligible for an EFV; larger service lines would be eligible for a manual shut-off valve. Only service lines with a total installed meter capacity of 1,000 SCFH or less qualify for an EFV. On MERC's system, a single service line often will serve multiple meters in commercial and multifamily applications, and in such cases, the total installed meter capacity served by the service line must be evaluated (i.e., whether the total installed meter capacity of all meters falls below the EFV threshold specified within the federal regulations). Each service line is evaluated when it is newly installed or replaced as to whether or not the service line should include a manual shut-off valve or EFV. MERC does not reevaluate eligibility based on subsequent customer changes outside of service line replacement.

¹⁰ 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 SCFH. However, the actual number of services with technical feasibility for an EFV installation may vary since an engineering analysis is required, on a case-by-case basis, to determine technical feasibility.

¹¹ 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. G999/CI-18-41.

¹² A customer unsuitable for an EFV may be suitable for a manual shut-off valve.

¹³ A customer is suitable for a manual shut-off valve if the customer does not meet the requirements of 49 CFR § 192.383.

¹⁴ 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.

L. Notification of Reportable Events

Each utility shall provide the Commission and the Department with notification of reportable events as they are defined by MNOPS, contemporaneous with the utility's notification of the event to MNOPS. The notice should be sent to the Commission's Consumer Affairs Office at consumer.puc@state.mn.us and shall describe the location and cause of the event, the number of customers affected, the expected duration of the event, and the utility's best estimate of when service will be restored.

MERC Response: MERC will continue to provide the Commission and the Department with notification of reportable events requiring the evacuation of 10 or more people contemporaneous with the utility's notification of the event to MNOPS through reporting to the Commission's Consumer Affairs Office.

M. Gas Emergency Response Times

Each utility shall report data on gas emergency response times and include the percentage of emergencies responded to: (1) within one hour, and (2) within more than one hour.

MERC Response: The required information is provided in Attachment 6. The gas emergency call response times include all calls reporting a suspected gas leak, as well as all line hits. MERC also reports the average number of minutes it takes to respond to an emergency. The information provided in Attachment 6 includes response times for all calls reporting a suspected gas leak and line hits. The information in Attachment 6 is the same information provided to MNOPS.

As required by the Commission in its February 9, 2018, Order Accepting MERC's 2015 and 2016 Gas Service Quality Reports issued in Docket Nos. G011/M-16-371 and G011/M-17-343, MERC provides the emergency response times in total and without farm tap customers. Attachment 6 provides emergency response times for all customers; Attachment 6A provides emergency response times for all non-farm tap customers; and Attachment 6B provides emergency response times for farm tap customers.

N. Customer Service-Related Operations and Maintenance Expenses

Each utility shall report customer-service related operations and maintenance expenses. The reports shall include only Minnesota-regulated, customer-service expenses and shall be based on the costs each utility records in its FERC accounts 901 and 903, plus payroll taxes and benefits.

MERC Response: The required information is provided in Attachment 12. There was an 11.8% overall increase between 2018 and 2019 in customer-service related expenses recorded in FERC accounts 901 and 903. Specifically, there is a significant decline in charges to FERC Account 901, and a significant increase in charges to FERC Account 903 between 2018 and 2019 as a result of a change in the FERC account

charged for postage associated with the mailing of bills to customers. Charges to FERC Account 903 also increased between 2018 and 2019 due to an overall increase in customer costs.

O. ICE Performance Indicators

As noted above, the Commission's October 31, 2016, Findings of Fact, Conclusions, and Order in Docket No. G011/GR-15-736, required that MERC develop, in consultation with the Department and the OAG, a tool or survey to measure the effectiveness over time of the ICE Project as it relates to the customer services that were intended to be improved by the project.¹⁵ The Commission further ordered that the Company report on its performance toward the identified benchmarks annually with MERC's gas service quality reporting. In particular, the Commission's Order provided:

On an annual basis starting in 2017, MERC shall place \$500,000 from ratepayers into an account.

a. By February 2017 MERC shall develop a tool or survey to measure the effectiveness over time of the ICE project as it relates to the customer services that were intended to be improved by the project. Any survey, consultant, program, or tool to measure project effectiveness must be adopted in consultation with the Department and the OAG.

b. The Company, after consultation with the Department and the OAG, shall set annual ICE-project customer-service benchmarks to be reached by the end of 2017. The Company may modify these benchmarks and shall report annually unless the Commission determines ongoing monitoring is no longer necessary and that the \$500,000 no longer needs to be set aside as a performance incentive.

c. The Company shall report performance towards these benchmarks annually at the same time they do their service-quality reporting. At that time the Commission will determine whether the benchmarks for retention of the \$500,000 have been met.

MERC Response: In accordance with the agreed-upon Performance Indicators identified in consultation with the Department and the OAG, and consistent with MERC's reporting on its 2017 ICE Performance Indicators, MERC addresses the following metrics to measure the effectiveness of the ICE Project during 2019:

¹⁵ *In the Matter of the Application of Minn. Energy Res. Corp. for Auth. to Increase Rates for Nat. Gas Serv. in Minn.*, Docket No. G011/GR-15-736, FINDINGS OF FACT, CONCLUSIONS, AND ORDER at 55, Order Point 11 (Oct. 31, 2016).

- (1) **customer transaction satisfaction:** measures customer satisfaction with their transaction based on a third-party survey (transactions include customer service calls, moves, etc.);
- (2) **residential first call resolution:** measures customers' perception of resolving their issue on their first contact;
- (3) **billing accuracy:** percentage of bills that are not cancelled, rebilled, or adjusted;
- (4) **billing timeliness:** percentage of bills created within the billing window, not including any impacts from printing and mailing processes;
- (5) **even payment plan adoption:** percent of customers on even payment plan;
- (6) **electronic bill adoption:** percent of customer accounts enrolled in e-billing;
- (7) **electronic payment adoption:** percent of electronic payments;
- (8) **field service appointments kept:** percentage of customer appointments kept;
- (9) **information technology ("IT")/security:** number of masked data fields and number of tokenized customer data fields; and
- (10) **net write off as percentage of revenue:** the ratio of the dollar amount of receivables written off less recoveries against gross write-offs, divided by rolling 12-months revenue.

Attachment 13 shows the Company's achievements with respect to each of the agreed-upon ICE Performance Indicators and each Performance Indicator is discussed below. Consistent with MERC's commitment in Docket No. G011/M-18-317, MERC is also providing (1) an explanation of the aspects of the ICE project that are expected to contribute to continuous improvement in each Performance Indicator, (2) identification of any barriers to achieving continuous improvement for each metric, and (3) MERC's expectations of future performance.¹⁶

¹⁶ *In the Matter of the Annual Serv. Quality Report for Minn. Energy Res. Corp. for 2017*, Docket No. G011/M-18-317, DEPARTMENT RESPONSE COMMENTS at 4 (Aug. 20, 2018) ("In response to the Department's Comments, MERC provided a table showing, for each metric, the aspects of ICE that are contributing to continuous improvement, the barriers to expected achievements, and MERC's expectation for future performance. The Department believes this information provides valuable insight into MERC's 2017 performance, and requests that the Company provide this information in future reports.").

1. Customer Transaction Satisfaction

As discussed in MERC's January 31, 2017, Compliance Filing in Docket No. G011/GR-15-736, the value to customers from this Performance Indicator is measured by customers' overall satisfaction with calls to customer service and other transactions.

As discussed in MERC's 2017 Gas Service Quality Report filed in Docket No. G011/M-18-317, in 2017, based on customer feedback and after initial testing, MERC shifted from third-party telephone surveys to e-mail surveys. As a result of this change, in order to provide a meaningful comparison to the baseline measurement, MERC completed an analysis to allow for statistical adjustment of results under the newly-implemented e-mail survey method as compared to the previously-used telephone survey method. In particular, testing was performed between July 18, 2016, and September 25, 2016, across all WEC utilities to evaluate the impact of moving from the telephone survey to an e-mail-based survey. During this testing period, the Company collected 542 completed surveys from MERC residential customers, 315 of which were e-mail surveys and 227 of which were telephone surveys. Conducting surveys using both methods (telephone and e-mail) over the same period allowed for an isolation of differences in customer satisfaction reporting attributable to the survey method. The result of the comparison was that Customer Transaction Satisfaction was 8.3 percentage points higher for surveys conducted via telephone compared to e-mail surveys. In response to feedback from the Department, this data was utilized to provide a statistically-adjusted comparison of 2016 Customer Transaction Satisfaction (under telephone surveys) to 2017 results (under e-mail surveys).

This same statistical adjustment methodology was applied to MERC's 2018 and 2019 Customer Transaction Satisfaction results. As reflected in MERC's 2018 service quality filing, the target performance for Customer Transaction Satisfaction for 2019 was continuous improvement from pre-ICE baseline levels, driving toward first quartile performance. As shown in Table 10, below, and in Attachment 13, 2019 statistically-adjusted performance of 85.70 percent is a slight decline from 2018 performance, but still remains within first quartile performance. Extreme weather conditions in the first quarter of 2019 caused lower satisfaction levels in the first half of 2019, leading to the slight decline from 2018 performance. Performance for this indicator continues to significantly exceed the baseline (pre-ICE) level.

Table 10: Customer Transaction Satisfaction

Baseline 2013-2015 Performance	1 st Quartile (Entry Point)	2 nd Quartile (Entry Point)	2016 Performance	2017 Performance (statistically adjusted)	2018 Performance (statistically adjusted)	2019 Performance (statistically adjusted)
62%	82.0%	72%	83.6%	86.8%	86.9%	85.7%

Attachment 13 to this filing also provides a discussion of the aspects of ICE that contribute to improvement in Customer Transaction Satisfaction, identified barriers to continuous improvement within this measure, and expected future performance. As discussed in Docket No. G011/M-18-317, the target performance of continuous improvement should be viewed in the context of each performance metric, taking into

consideration the performance achievements that can be specifically attributed to the ICE Project as well as factors outside of the customer information system that impact results. Because each metric is affected by much more than just the ICE technology or platform, MERC could never achieve, much less guarantee, that year after year each metric would improve. Rather, “continuous improvement” can be achieved, and should be evaluated, over a longer period of time, starting with the 2013-2015 baseline performance.

2. Residential First Call Resolution

As discussed in MERC’s January 31, 2017, Compliance Filing, the value to customers from this Performance Indicator is measured by the amount of time a customer needs to spend to resolve issues or concerns, and the metric gauges whether customers successfully resolved their reason for contacting the Company with their first contact. The target performance for 2019 for Residential First Call Resolution was to maintain achievements within the first quartile.

As summarized in Table 11 below and in Attachment 13, performance for 2019 with respect to Residential First Call Resolution maintained alignment with 2018. MERC continued to achieve first quartile performance in 2019.

Table 11: Residential First Call Resolution

Baseline 2013-2015 Performance	1st Quartile (Entry Point)	2nd Quartile (Entry Point)	2016 Performance	2017 Performance	2018 Performance	2019 Performance
80.67%	85%	79%	81.78%	83.30%	91.50%	91.40%

Attachment 13 to this filing also provides a discussion of the aspects of ICE that contribute toward improvement in Residential First Call Resolution, identified barriers to continuous improvement within this measure, and expected future performance.

3. Billing Accuracy

As discussed in MERC’s January 31, 2017, Compliance Filing submitted in Docket No. G011/GR-15-736, this Performance Indicator is measured by whether customers receive accurate bills. The target performance for 2019 for Billing Accuracy was to maintain 2018 performance with slight improvements in 2019 and beyond, dependent on other external factors.

As shown in Table 12 below and in Attachment 13, performance related to this indicator in 2019 trended downward slightly from 2018, but the decline was unrelated to ICE. Rather, the decrease was driven largely by weather impacts resulting in a slightly higher number of estimated reads, impacting the billing accuracy metric in 2019.

In the absence of automatic meter reading (“AMR”) or advanced metering infrastructure (“AMI”), MERC does not anticipate achieving first quartile performance with respect to

this metric; weather, accessibility, and human error will likely continue to impact performance going forward until MERC's AMI project is fully implemented. While replacement of MERC's outdated billing system created opportunities for improvements in billing accuracy and allowed for automation of more complex billing functions, factors unrelated to the customer information system have and will continue to impact performance with respect to this metric. Demonstration of the effectiveness of the ICE Project with respect to billing is not, and should not be, undermined by impacts unrelated to ICE such as weather.

Table 12: Billing Accuracy

Baseline 2013-2015 Performance	1st Quartile (Entry Point)	2nd Quartile (Entry Point)	2016 Performance	2017 Performance	2018 Performance	2019 Performance
99.53%	99.93%	99.79%	99.77%	98.93%	98.85%	98.47%

Attachment 13 to this filing provides a discussion of the aspects of ICE that contribute toward improvement in Billing Accuracy, identified barriers to continuous improvement within this measure, and expected future performance.

4. Billing Timeliness

As discussed in MERC's January 31, 2017, Compliance Filing submitted in Docket No. G011/GR-15-736, this Performance Indicator is measured by the timeliness of customer bills. Timely bills allow customers to efficiently predict and manage their monthly expenditures. The target performance for 2019 for Billing Timeliness was to maintain performance with slight improvements in 2019 and beyond, dependent on other external factors.

Performance in 2019 was 99.13 percent, maintaining second quartile performance. While the 2019 results were slightly below 2018 results, MERC attributes this to the same weather impacts that affected Billing Accuracy, as discussed above. For example, weather can affect billing timeliness by impacting meter reading if roads are closed and meters are inaccessible due to significant snowfalls or rainfalls, which occurred during the Polar Vortex of 2019. Additionally, issues such as customer billing disputes can and do occasionally affect billing timeliness. Even a small number of bill issues could result in a shift from the first to second quartile, given the narrow margin of performance at those levels.

Table 13: Billing Timeliness

Baseline 2013-2015 Performance	1st Quartile (Entry Point)	2nd Quartile (Entry Point)	2016 Performance	2017 Performance	2018 Performance	2019 Performance
99.89%	99.50%	99.00%	98.65%	99.48%	99.37%	99.13%

Attachment 13 to this filing also provides a discussion of the aspects of ICE that contribute toward improvement in Billing Timeliness, identified barriers to continuous improvement within this measure, and expected future performance.

5. Even Payment Plan Adoption

As discussed in MERC's January 31, 2017, Compliance Filing submitted in Docket No. G011/GR-15-736, Even Payment Plan Adoption is measured by how many customers choose this option to stabilize their monthly bills. The target performance for 2019 for the Even Payment Plan Adoption Performance Indicator was to maintain achievements within the second quartile, moving toward eventual first quartile performance of 16.8 percent.

With respect to the Even Payment Plan Adoption Performance Indicator, as shown in Table 14 and Attachment 13, for 2019, MERC has seen continued improvement from the performance baseline (pre-ICE) of 14.43 percent; from 2016 of 15.12 percent; from 2017 of 15.51 percent, and from 2018 of 16.0 percent performance levels. In comparison, 2019 performance achieved 16.1 percent, trending towards the first quartile of 16.80 percent. MERC is achieving its performance target, improving within the second quartile and moving toward first quartile performance of 16.80 percent.

Table 14: Even Payment Plan Adoption

Baseline 2013-2015 Performance	1st Quartile (Entry Point)	2nd Quartile (Entry Point)	2016 Performance	2017 Performance	2018 Performance	2019 Performance
14.43%	16.80%	11.90%	15.12%	15.51%	16.00%	16.10%

Attachment 13 to this filing also provides a discussion of the aspects of ICE that contribute toward improvement in Even Payment Plan Adoption, identified barriers to continuous improvement within this measure, and expected future performance.

6. Electronic Bill Adoption

As discussed in MERC's January 31, 2017, Compliance Filing submitted in Docket No. G011/GR-15-736, this Performance Indicator is measured by the number of customers who choose to receive electronic bills. Implementation of the ICE Project contributed to the optimization of this performance measure by making the electronic billing application more user-friendly for customers, increasing mobile options, and allowing customers to continue electronic billing if they move and transfer service to a new address. The target performance for 2019 for Electronic Bill Adoption was to maintain first quartile performance.

With respect to the Electronic Bill Adoption Performance Indicator, for 2019, performance exceeded the baseline (pre-ICE), as well as 2016 through 2018 performance levels. In particular, baseline performance was 20.27 percent (2013-2015), 2016 performance was 22.38 percent, 2017 performance was 26.21 percent,

and 2018 performance was 30.50 percent, while MERC achieved 31.70 percent in 2019. Additionally, MERC achieved its target performance of maintaining first quartile performance.

Table 15: Electronic Bill Adoption

Baseline 2013-2015 Performance	1st Quartile (Entry Point)	2nd Quartile (Entry Point)	2016 Performance	2017 Performance	2018 Performance	2019 Performance
20.27%	14.50%	10.30%	22.38%	26.21%	30.50%	31.70%

Attachment 13 to this filing also provides a discussion of the aspects of ICE that contribute toward improvement in Electronic Bill Adoption, identified barriers to continuous improvement within this measure, and expected future performance.

7. Electronic Payment Adoption

As discussed in MERC's January 31, 2017, Compliance Filing submitted in Docket No. G011/GR-15-736, this Performance Indicator is measured by whether customers opt to make payments electronically. Implementation of the ICE Project contributed to increases in this performance measure by making the electronic billing application more user-friendly for customers, increasing mobile options, and allowing customers to continue electronic billing if they move and transfer service to a new address. The target performance for 2019 for Electronic Payment Adoption was to maintain first quartile performance.

With respect to the Electronic Payment Adoption Performance Indicator, for 2019, MERC exceeded both the performance baseline as well as 2016 through 2018 performance, maintaining first quartile performance. In particular, as shown in Table 16 below and Attachment 13, baseline performance was 55.50 percent (2013-2015), 2016 performance was 57.58 percent, 2017 performance was 60.42 percent, and 2018 performance was 60.90 percent, while 2019 performance increased to 66.00 percent. Additionally, MERC achieved its target of maintaining first quartile performance.

Table 16: Electronic Payment Adoption

Baseline 2013-2015 Performance	1st Quartile (Entry Point)	2nd Quartile (Entry Point)	2016 Performance	2017 Performance	2018 Performance	2019 Performance
55.50%	51.60%	45.30%	57.58%	60.42%	60.90%	66.00%

Attachment 13 to this filing also provides a discussion of the aspects of ICE that contribute toward improvement in Electronic Payment Adoption, identified barriers to continuous improvement within this measure, and expected future performance.

8. Field Service Appointments Kept

As discussed in MERC's January 31, 2017, Compliance Filing submitted in Docket No. G011/GR-15-736, the value to customers from this Performance Indicator is that keeping field service appointments results in customer convenience and satisfaction by not having to reschedule appointments or miss additional work to obtain service. The target performance for 2019 for the Field Service Appointments Kept Performance Indicator was to maintain first quartile performance.

With respect to the Field Service Appointments Kept Performance Indicator, for 2019, MERC exceeded 2016 performance and achieved the performance benchmark of maintaining first quartile performance.¹⁷ As reflected in Table 17, below, and Attachment 13, in 2019, MERC kept 99.99 percent of field service appointments.

Table 17: Field Service Appointments Kept

Baseline 2013-2015 Performance	1st Quartile (Entry Point)	2nd Quartile (Entry Point)	2016 Performance	2017 Performance	2018 Performance	2019 Performance
N/A	99.0%	98.6%	99.89%	99.99%	99.99%	99.99%

Attachment 13 to this filing also provides a discussion of the aspects of ICE that contribute toward improvement in Field Service Appointments Kept, identified barriers to continuous improvement within this measure, and expected future performance.

9. IT/Security

As discussed in MERC's January 31, 2017, Compliance Filing submitted in Docket No. G011/GR-15-736, this metric measures the increased security of customer data. Though it is difficult to measure avoided data breaches directly, this metric aims to quantify the customer service improvements related to IT security available as a result of ICE implementation.

Prior to the ICE Project, MERC's customer information system did not have the capability to mask or tokenize customer information fields, resulting in a baseline of zero fields masked or tokenized. With the ICE Project implementation, the total number of customer data fields that are secured via masking or tokenization increased to approximately 1,386,000. These protected fields include information such as bank account information, birthdates, driver's license numbers, income, social security numbers, and credit card information, among others.

In 2019, MERC continued to achieve the same level of IT security protection and customer data masking and tokenization. As discussed in MERC's January 31, 2017, compliance filing, though the number of tokenized fields per customer is not expected to

¹⁷ As shown in Attachment 13, there is no baseline comparison for the Field Service Appointments Kept performance indicator.

increase in the near term, this metric captures the significant data security improvements resulting from the ICE Project.

10. Net Write-Offs as a Percentage of Revenue

With respect to the Net Write-Offs as a Percentage of Revenue Performance Indicator, MERC noted in the Company's January 31, 2017, compliance filing submitted in Docket No. G011/GR-15-736, that while ICE is intended to improve write-offs, gas prices and weather dominate the overall write-off impact. In particular, customer payments are more impacted by higher or lower bills (because of gas costs or colder or warmer weather) than MERC's collection activities. Because other outside factors have a significant impact on write-offs, it is difficult to measure improvements over time. Nevertheless, MERC agreed that reporting on write-offs could provide useful data and information and that the Company would attempt to provide a narrative explanation of factors outside of ICE that are or may be impacting this metric as part of the annual reporting.

Acknowledging that factors outside of collection activities significantly impact this metric, MERC's performance target with respect to the Net Write-Offs as a Percentage of Revenue Performance Indicator was continuous improvement within the second quartile to the extent such performance is achievable in consideration of external factors affecting overall write-offs.

For 2019, MERC's Net Write-Offs as a Percentage of Revenue were 0.80 percent, which is a slight decline in performance as compared to the baseline (pre-ICE) as well as 2016 through 2018 levels. While there was a decline in performance with respect to this measure, MERC believes it has seen improvements resulting from the implementation of ICE that contribute to reducing or containing uncollectible expense, such as increased use of e-billing, e-payment, and payment options. Such behaviors tend to help reduce uncollectible expense. Conversely, factors unrelated to the ICE Project such as weather and the Polar Vortex of 2019, negatively impacted total net write-offs.

Table 18: Net Write Offs as a Percentage of Revenue

Baseline 2013-2015 Performance	1st Quartile (Entry Point)	2nd Quartile (Entry Point)	2016 Performance	2017 Performance	2018 Performance	2019 Performance
0.58%	0.35%	0.52%	0.73%	0.58%	0.75%	0.80%

Attachment 13 to this filing provides a discussion of the aspects of the ICE Project that contribute toward improvement in Net Write-Offs as a Percent of Revenue, identified barriers to continuous improvement within this measure, and expected future performance.

The Company will continue to target performance within the second quartile, driving towards eventual first quartile performance with respect to this indicator to the extent

such performance is achievable in consideration of external factors affecting overall write-offs. MERC will also continue to provide a narrative explanation of the factors impacting performance with respect to this measure.

CONCLUSION

When considering the overall Performance Indicators associated with the ICE Project, MERC has continued to meet or exceed many of the identified metrics for calendar year 2019, continuing to demonstrate the overall effectiveness of the ICE Project in achieving improved customer service and delivering on the specific areas of customer service intended to be improved by the ICE Project. While factors unrelated to the ICE Project negatively impacted some of MERC's 2019 Performance Indicators, as reflected in this filing, those factors do not undermine a conclusion that MERC has demonstrated the effectiveness over time of the ICE Project as it relates to the customer services that were intended to be improved by the project. Further, as summarized in this report, MERC has continued its success on many of its standard gas service quality reporting metrics as well. MERC has demonstrated that the benchmarks have been met for the Company to retain the \$500,000 and requests that the Commission issue an Order authorizing the Company to retain the \$500,000 set aside, in accordance with the Commission's October 31, 2016, Findings of Fact, Conclusions, and Order issued in Docket No. G011/GR-15-736.

Additionally, because MERC's 2017 through 2019 ICE performance metrics indicate that the ICE Project has achieved its stated objectives in improving customer service, MERC requests that the Commission determine that ongoing monitoring and reporting is no longer necessary, and that the \$500,000 no longer needs to be set aside as a performance incentive. Now that ICE has been fully implemented, further significant improvements stemming directly from the ICE Project in the identified performance measures are not anticipated, although incremental improvements in some areas may continue. Additionally, other external factors have and will increasingly impact performance with respect to these measures. MERC believes it has demonstrated improvements with respect to the identified ICE Performance Indicators and has fully explained areas where factors outside of the ICE Project have and will continue to impact overall performance.

MERC respectfully requests that the Commission accept the Company's 2019 Gas Service Quality Report as in compliance with all applicable reporting requirements, find that the Company has demonstrated that MERC has satisfied the benchmarks set for 2019 associated with the ICE Project, and determine that ongoing monitoring and reporting on ICE performance metrics is no longer necessary.

Dated: May 1, 2020

Respectfully submitted,

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Call Center Response Time

Calls answered within 20 seconds

	January	February	March	April	May	June	July	August	September	October	November	December	Average	Total
Total calls	25,824	22,064	25,640	27,522	26,163	23,438	22,903	21,006	24,765	28,622	19,663	19,087	286,697	286,697
Average speed of answer (seconds)	13	12	25	14	12	14	14	24	59	39	16	11	22	
% answered in 20 seconds	83%	85%	74%	82%	86%	83%	81%	71%	43%	63%	82%	86%	76%	

Answer time for gas emergency phone lines

	January	February	March	April	May	June	July	August	September	October	November	December	Average	Total
Total calls	1,815	1,657	1,691	1,517	1,611	1,472	1,557	1,545	1,537	2,191	1,533	1,320		19,446
Average speed of answer (seconds)	4	4	6	4	4	4	4	8	6	9	5	4	5	
% answered in 15 seconds	97%	97%	92%	96%	96%	96%	95%	90%	92%	89%	96%	97%	95%	

Response:

Performance in September and October impacted yearly average and our ability to recover the ASA (Average Speed of Answer) and Service Level. Fall volumes spiked higher than normal for all Care Centers Utilities. Addressed performance gaps with improvement plans for remainder of the year as seen by November and December performance.

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 ¹	% not read > 12 months	Comments
without farm taps										
January	240,763	230,990	95.94%	121	0.05%	6	0.0025%	2	0.0008%	weather, accessibility, dogs, processing delays, untimely self-reads
February	240,830	192,190	79.80%	117	0.05%	5	0.0021%	2	0.0008%	weather, accessibility, dogs, processing delays, untimely self-reads
March	240,900	195,988	81.36%	135	0.06%	6	0.0025%	2	0.0008%	weather, accessibility, dogs, processing delays, untimely self-reads
April	241,044	233,292	96.78%	101	0.04%	13	0.0054%	2	0.0008%	weather, accessibility, dogs, processing delays, untimely self-reads
May	241,150	239,359	99.26%	101	0.04%	11	0.0046%	2	0.0008%	weather, accessibility, dogs, processing delays, untimely self-reads
June	241,471	226,173	93.66%	102	0.04%	7	0.0029%	2	0.0008%	weather, accessibility, dogs, processing delays, untimely self-reads
July	241,843	238,262	98.52%	99	0.04%	7	0.0029%	2	0.0008%	weather, accessibility, dogs, processing delays, untimely self-reads
August	242,222	237,596	98.09%	94	0.04%	6	0.0025%	2	0.0008%	weather, accessibility, dogs, processing delays, untimely self-reads
September	242,542	226,664	93.45%	96	0.04%	6	0.0025%	2	0.0008%	weather, accessibility, dogs, processing delays, untimely self-reads
October	243,069	242,515	99.77%	102	0.04%	4	0.0016%	1	0.0004%	weather, accessibility, dogs, processing delays, untimely self-reads
November	243,481	212,960	87.46%	108	0.04%	3	0.0012%	5	0.0021%	weather, accessibility, dogs, processing delays, untimely self-reads
December	243,656	229,261	94.09%	105	0.04%	4	0.0016%	5	0.0021%	weather, accessibility, dogs, processing delays, untimely self-reads
	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
with farm taps										
January	242,653	231,212	95.29%	851	0.35%	359	0.1479%	3	0.0012%	farm taps, weather, accessibility, dogs, untimely self-reads
February	242,719	192,363	79.25%	726	0.30%	362	0.1491%	3	0.0012%	farm taps, weather, accessibility, dogs, untimely self-reads
March	242,782	196,229	80.83%	863	0.36%	349	0.1438%	3	0.0012%	farm taps, weather, accessibility, dogs, untimely self-reads
April	242,922	233,689	96.20%	854	0.35%	308	0.1268%	3	0.0012%	farm taps, weather, accessibility, dogs, untimely self-reads
May	243,027	240,055	98.78%	795	0.33%	201	0.0827%	14	0.0058%	farm taps, weather, accessibility, dogs, untimely self-reads
June	243,348	226,826	93.21%	741	0.30%	66	0.0271%	30	0.0123%	farm taps, weather, accessibility, dogs, untimely self-reads
July	243,717	238,640	97.92%	769	0.32%	54	0.0222%	16	0.0066%	farm taps, weather, accessibility, dogs, untimely self-reads
August	244,097	237,885	97.46%	778	0.32%	48	0.0197%	7	0.0029%	farm taps, weather, accessibility, dogs, untimely self-reads
September	244,416	226,914	92.84%	741	0.30%	42	0.0172%	4	0.0016%	farm taps, weather, accessibility, dogs, untimely self-reads
October	244,933	242,863	99.15%	778	0.32%	66	0.0269%	3	0.0012%	farm taps, weather, accessibility, dogs, untimely self-reads
November	245,340	213,239	86.92%	721	0.29%	143	0.0583%	6	0.0024%	farm taps, weather, accessibility, dogs, untimely self-reads
December	245,508	229,424	93.45%	802	0.33%	254	0.1035%	9	0.0037%	farm taps, weather, accessibility, dogs, untimely self-reads

¹ These accounts not being read > 12 months were due to administrative processing delays for new meter installs.

MERC has addressed these unread meters and has implemented procedures to avoid future process delays resulting in unread meters.

Meter Reading FTEs

	Hours charged to Meter Reading												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total Yr
2010	5,106	5,807	5,048	6,118	4,245	4,026	3,962	3,954	3,884	6,114	3,736	4,732	56,731
2011	5,293	5,432	5,178	6,446	4,185	3,705	3,824	4,042	3,862	5,989	3,800	4,592	56,346
2012	4,139	4,469	4,271	6,122	3,973	3,844	3,834	4,133	3,882	5,744	3,616	4,552	52,579
2013	4,041	4,382	4,271	6,207	3,920	3,684	3,723	3,682	3,849	5,658	3,980	4,083	51,481
2014	5,312	5,173	5,067	4,840	4,123	4,029	4,119	3,811	3,895	4,136	3,784	4,711	52,999
2015	4,552	4,364	4,563	4,362	4,035	4,406	3,876	4,352	4,013	4,338	7,782	4,243	54,887
2016	4,094	5,134	4,869	4,198	4,222	4,291	3,988	4,537	4,086	4,049	4,158	4,672	52,295
2017	4,989	4,454	4,680	3,795	4,168	4,151	3,622	4,170	3,741	3,938	3,945	4,221	49,874
2018	4,802	4,412	4,546	4,259	4,005	4,002	4,030	4,092	3,392	3,807	3,451	3,613	48,411
2019	4,447	4,526	4,388	3,950	3,824	3,308	3,904	3,935	3,575	3,962	3,627	4,090	47,535

	FTE Equivalent												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total Yr
2010	29.3	33.4	29.0	35.2	24.4	23.1	22.8	22.7	22.3	35.1	21.5	27.2	27.3
2011	30.4	31.2	29.8	37.0	24.1	21.3	22.0	23.2	22.2	34.4	21.8	26.4	27.1
2012	23.8	25.7	24.5	35.2	22.8	22.1	22.0	23.8	22.3	33.0	20.8	26.2	25.3
2013	23.2	25.2	24.5	35.7	22.5	21.2	21.4	21.2	22.1	32.5	22.9	23.5	24.8
2014	30.5	29.7	29.1	27.8	23.7	23.2	23.7	21.9	22.4	23.8	21.7	27.1	25.5
2015	26.2	25.1	26.2	25.1	23.2	25.3	22.3	25.0	23.1	24.9	44.7	24.4	26.4
2016	23.5	29.5	28.0	24.1	24.3	24.7	22.9	26.1	23.5	23.3	23.9	26.8	25.1
2017	28.7	25.6	26.9	21.8	24.0	23.9	20.8	24.0	21.5	22.6	22.7	24.3	24.0
2018	27.6	25.4	26.1	24.5	23.0	23.0	23.2	23.5	19.5	21.9	19.8	20.8	23.3
2019	25.6	26.0	25.2	22.7	22.0	19.0	22.4	22.6	20.5	22.8	20.8	23.5	22.9

External Meter Readers - FTE	
2010	4.60
2011	4.65
2012	4.25
2013	4.75
2014	4.80
2015	6.10
2016	6.37
2017	6.72
2018	9.62
2019	12.99

**Minnesota Energy Resources
Service Quality Report**

Minnesota Cold Weather Rule Compliance Questionnaire
Utility Monthly Reports (216B.091) Docket #15-02

Non CWR Months

Company: Minnesota Energy Resources for report period ending:

	Jan-2019	Feb-2019	Mar-2019	Apr-2019	May-2019	Jun-2019	Jul-2019	Aug-2019	Sep-2019	Oct-2019	Nov-2019	Dec-2019
1 Number of Residential Customer Accounts:	214,208	214,487	214,511	214,439	213,688	213,071	212,832	208,781	209,017	210,286	211,891	212,280
2 Number of Past Due Residential Customer Accounts:	27,353	26,945	27,096	28,150	28,096	30,513	27,244	27,618	23,215	29,027	25,038	26,684
3 Number of Cold Weather Protection Requests:	1,609	1,187	1,377	1,403						923	941	1,253
RECONNECTION AT BEGINNING OF COLD WEATHER MONTHS												
4 Number of "Right to Appeal" notices mailed to customers:	0	0	0	0	0	0	0	0	0	0	2	0
5 <i>Intentionally Blank</i>												
6 Number of customer accounts granted reconnection request:	80	30	100	271						19	1	14

INABILITY TO PAY (ITP)

10% PLAN (TPP)

Minnesota Energy Resources
Service Quality Report

Minnesota Cold Weather Rule Compliance Questionnaire
Utility Monthly Reports (216B.091) Docket #15-02

Non CWR Months

Company: Minnesota Energy Resources for report period ending:

Jan-2019 Feb-2019 Mar-2019 Apr-2019 May-2019 Jun-2019 Jul-2019 Aug-2019 Sep-2019 Oct-2019 Nov-2019 Dec-2019

PAYMENT SCHEDULE (PS)

16	Number of "Right to Appeal" notices mailed to customers:	0	0	0	0					0	0	0
a)	Number of PS requests received	1,609	1,187	1,377	1,403					923	941	1,253
17	<i>Intentionally Blank</i>											
18	Number of PS negotiations mutually agreed upon:	1,609	1,187	1,377	1,403					923	941	1,253
19	<i>Intentionally Blank</i>											

DISCONNECTIONS

20	Number of disconnection notices mailed to customers:	6,557	8,175	9,598	10,329	7,393	4,679	3,071	1,646	722	678	819	1,609
21	Number of customer accounts disconnected who did not seek protection:												

Duplicate columns for use in April and October
April 1-15 and October 1-15 in 1st column

All other months, use 1st column only

a)	# Electric - heat affected												
b)	# Electric - heat not affected												
c)	# Gas - heat affected	90	38	228	218	1,266	1,048	834	350	249	67	12	47
d)	# Gas - heat not affected												
e)	Total # disconnected												

April 16-30 and October 16-31 in 2nd column

All other months, use 1st column only

a)	# Electric - heat affected												
b)	# Electric - heat not affected												
c)	# Gas - heat affected				509						5		
d)	# Gas - heat not affected												
e)	Total # disconnected												

22	Number of customer accounts disconnected seeking protection:												
a)	# Electric - heat affected												
b)	# Electric - heat not affected												
c)	# Gas - heat affected												
d)	# Gas - heat not affected												
e)	Total # disconnected (See Note)	0	0	0	0	0	0	0	0	0	0	0	0

NOTE: Please report immediately the names and addresses of customers whose service has been disconnected more than 24 hours.

23	Number of customer accounts disconnected for nonpayment (auto-calculation of #21e+ #22e):	90	38	228	727	1,266	1,048	834	350	249	72	12	47
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Minnesota Energy Resources
Service Quality Report

Minnesota Cold Weather Rule Compliance Questionnaire
Utility Monthly Reports (216B.091) Docket #15-02

Non CWR Months

Company: Minnesota Energy Resources for report period ending:

Jan-2019 Feb-2019 Mar-2019 Apr-2019 May-2019 Jun-2019 Jul-2019 Aug-2019 Sep-2019 Oct-2019 Nov-2019 Dec-2019

DOLLAR VALUE

24	Total dollars past due on all residential accounts:	\$4,134,842	\$4,853,489	\$5,400,126	\$5,237,604	\$4,516,173	\$4,706,967	\$3,072,754	\$2,296,864	\$1,294,801	\$1,280,480	\$1,538,986	\$2,525,957
25	Average past due dollar amount per past due account (auto-calculation of #24 ÷ #2):	\$151	\$180	\$199	\$186	\$161	\$154	\$113	\$83	\$56	\$44	\$61	\$95
26	Total dollars received from energy assistance programs:	\$748,025	\$591,536	\$604,215	\$634,647	\$237,830	\$95,502	\$6,091	\$0	\$0	\$0	\$542,975	\$637,361
27	Total dollars received from other sources (private organizations):	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
28	Total Revenue from sales to residential accounts:	\$26,526,838	\$32,889,193	\$27,048,412	\$15,690,466	\$11,209,377	\$6,432,928	\$4,354,361	\$3,595,482	\$3,938,354	\$5,054,718	\$12,114,592	\$19,426,879
29	Average monthly residential bill: (auto-calculation of #28 ÷ #1)	\$124	\$153	\$126	\$73	\$52	\$30	\$20	\$17	\$19	\$24	\$57	\$92
30	Intentionally Blank												
30	Average annual residential bill:												
31	Total residential account write-offs due to uncollectible:	\$141,699	\$94,873	\$164,343	\$269,467	\$204,331	\$122,319	\$161,513	\$170,223	\$137,801	\$195,574	\$180,948	\$436,455

DISCONNECTION DURATION

32	Number of customer accounts disconnected 24 hours or more:												
a)	# Electric - heat affected												
b)	# Electric - heat not affected												
c)	# Gas - heat affected	75	37	122	450						67	7	37
d)	# Gas - heat not affected												
e)	Total # disconnected												
33	Intentionally Blank												
34	Number occupied heat-affected accounts disconnected 24 hours or more (to include customers who did and did not seek protection).												
35	Intentionally Blank												
36	Intentionally Blank												

RECONNECTION DATA

37	# Accounts reconnected	80	30	100	271	531	438	331	195	102	19	1	14
38	# Accounts remaining disconnected	144	167	295	713	1,408	2,008	2,673	2,892	2,900	3,053	2,964	3,002
a)	1-30 days	29	16	128	440	791	661	596	266	232	57	12	39
b)	31-60 days	24	47	16	85	349	744	645	550	252	231	56	12
c)	61+ days	91	104	151	188	268	603	1,432	2,076	2,416	2,765	2,896	2,951

Minnesota Public Utilities Commission

Minnesota Cold Weather Rule Compliance Questionnaire

Version 4.2

Company Submitting Reply:	Minnesota Energy Resources	▼
Reporting Year:	2019	▼
Reporting Period:	January	▼

Utility Monthly Reports (216B.091)

Company: Minnesota Energy Resources for report period ending: January, 2019

1	Number of Residential Customer Accounts:	214,208
2	Number of Past Due Residential Customer Accounts:	27,353
3	Number of Cold Weather Protection Requests:	1,609

RECONNECTION AT BEGINNING OF COLD WEATHER MONTHS

4	Number of "Right to Appeal" notices mailed to customers:	0
5	<i>Intentionally Blank</i>	
6	Number of customer accounts granted reconnection <u>request</u> :	80

INABILITY TO PAY (ITP)

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10% PLAN (TPP)

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Amended CWR Monthly January 2019.xls

Company: Minnesota Energy Resources for report period ending: January, 2019

PAYMENT SCHEDULE (PS)

16	Number of "Right to Appeal" notices mailed to customers:	0
a)	Number of PS requests received	1,609
17	<i>Intentionally Blank</i>	
18	Number of PS negotiations mutually agreed upon:	1,609
19	<i>Intentionally Blank</i>	

DISCONNECTIONS

20	Number of disconnection notices mailed to customers:	6,557
21	Number of customer accounts disconnected who did not seek protection: Duplicate columns for use in April and October All other months, use 1st column only April 1-15 and October 1-15 in 1st column April 16-30 and October 16-31 in 2nd column	
a)	# Electric - heat affected	
b)	# Electric - heat not affected	
c)	# Gas - heat affected	90
d)	# Gas - heat not affected	
e)	Total # disconnected	90 0
22	Number of customer accounts disconnected seeking protection:	
a)	# Electric - heat affected	
b)	# Electric - heat not affected	
c)	# Gas - heat affected	0
d)	# Gas - heat not affected	
e)	Total # disconnected (See Note)	0
23	Number of customer accounts disconnected for nonpayment (auto-calculation of #21e+ #22e):	90 90

Amended CWR Monthly January 2019.xls

Company: Minnesota Energy Resources for report period ending: January, 2019

DOLLAR VALUE

24	Total dollars past due on all residential accounts:	\$4,134,842
25	Average past due dollar amount per past due account (auto-calculation of #24 ÷ #2):	\$151
26	Total dollars received from energy assistance programs:	\$748,025
27	Total dollars received from other sources (private organizations):	\$0
28	Total Revenue from sales to residential accounts:	\$26,526,838
29	Average monthly residential bill: (auto-calculation of #28 ÷ #1)	\$124
30	<i>Intentionally Blank</i>	
31	Total residential account write-offs due to uncollectible:	\$141,699

DISCONNECTION DURATION

32	Number of customer accounts disconnected 24 hours or more:	
a)	# Electric - heat affected	
b)	# Electric - heat not affected	
c)	# Gas - heat affected	75
d)	# Gas - heat not affected	
e)	Total # disconnected	75
33	<i>Intentionally Blank</i>	
34	Number occupied heat-affected accounts disconnected 24 hours or more (to include customers who did and did not seek protection).	0
35	<i>Intentionally Blank</i>	
36	<i>Intentionally Blank</i>	

RECONNECTION DATA

37	# Accounts reconnected	80
38	# Accounts remaining disconnected	144
a)	1-30 days	29
b)	31-60 days	24
c)	61+ days	91

[END]

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Amended 2 CWR Monthly February 2019.xls

Minnesota Public Utilities Commission

Minnesota Cold Weather Rule Compliance Questionnaire

Version 4.2

Company Submitting Reply:	Minnesota Energy Resources	▼
Reporting Year:	2019	▼
Reporting Period:	February	▼

Utility Monthly Reports (216B.091)

Company: Minnesota Energy Resources for report period ending: February, 2019

1	Number of Residential Customer Accounts:	214,487
2	Number of Past Due Residential Customer Accounts:	26,945
3	Number of Cold Weather Protection Requests:	1,187

RECONNECTION AT BEGINNING OF COLD WEATHER MONTHS

4	Number of "Right to Appeal" notices mailed to customers:	0
5	<i>Intentionally Blank</i>	
6	Number of customer accounts granted reconnection <u>request</u> :	30

INABILITY TO PAY (ITP)

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10% PLAN (TPP)

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Amended 2 CWR Monthly February 2019.xls

Company: Minnesota Energy Resources for report period ending: February, 2019

PAYMENT SCHEDULE (PS)

16	Number of "Right to Appeal" notices mailed to customers:	0
a)	Number of PS requests received	1,187
17	<i>Intentionally Blank</i>	
18	Number of PS negotiations mutually agreed upon:	1,187
19	<i>Intentionally Blank</i>	

DISCONNECTIONS

20	Number of disconnection notices mailed to customers:	8,175
21	Number of customer accounts disconnected who did not seek protection: Duplicate columns for use in April and October All other months, use 1st column only April 1-15 and October 1-15 in 1st column April 16-30 and October 16-31 in 2nd column	
a)	# Electric - heat affected	
b)	# Electric - heat not affected	
c)	# Gas - heat affected	38
d)	# Gas - heat not affected	
e)	Total # disconnected	38 0
22	Number of customer accounts disconnected seeking protection:	
a)	# Electric - heat affected	
b)	# Electric - heat not affected	
c)	# Gas - heat affected	
d)	# Gas - heat not affected	
e)	Total # disconnected (See Note)	0
23	Number of customer accounts disconnected for nonpayment (auto-calculation of #21e+ #22e):	38 38

Amended 2 CWR Monthly February 2019.xls

Company: Minnesota Energy Resources for report period ending: February, 2019

DOLLAR VALUE

24	Total dollars past due on all residential accounts:	\$4,853,489
25	Average past due dollar amount per past due account (auto-calculation of #24 ÷ #2):	\$180
26	Total dollars received from energy assistance programs:	\$591,536
27	Total dollars received from other sources (private organizations):	\$0
28	Total Revenue from sales to residential accounts:	\$32,889,193
29	Average monthly residential bill: (auto-calculation of #28 ÷ #1)	\$153
30	<i>Intentionally Blank</i>	
31	Total residential account write-offs due to uncollectible:	\$94,873

DISCONNECTION DURATION

32	Number of customer accounts disconnected 24 hours or more:	
a)	# Electric - heat affected	
b)	# Electric - heat not affected	
c)	# Gas - heat affected	37
d)	# Gas - heat not affected	
e)	Total # disconnected	37
33	<i>Intentionally Blank</i>	
34	Number occupied heat-affected accounts disconnected 24 hours or more (to include customers who did and did not seek protection).	0
35	<i>Intentionally Blank</i>	
36	<i>Intentionally Blank</i>	

RECONNECTION DATA

37	# Accounts reconnected	30
38	# Accounts remaining disconnected	167
a)	1-30 days	16
b)	31-60 days	47
c)	61+ days	104

[END]

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Minnesota Public Utilities Commission

Minnesota Cold Weather Rule Compliance Questionnaire

Version 4.2

Company Submitting Reply:	Minnesota Energy Resources	▼
Reporting Year:	2019	▼
Reporting Period:	March	▼

Utility Monthly Reports (216B.091)

Company: Minnesota Energy Resources for report period ending: March, 2019

1	Number of Residential Customer Accounts:	214,511
2	Number of Past Due Residential Customer Accounts:	27,096
3	Number of Cold Weather Protection Requests:	1,377

RECONNECTION AT BEGINNING OF COLD WEATHER MONTHS

4	Number of "Right to Appeal" notices mailed to customers:	0
5	<i>Intentionally Blank</i>	
6	Number of customer accounts granted reconnection <u>request</u> :	100

INABILITY TO PAY (ITP)

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10% PLAN (TPP)

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Amended CWR Monthly March 2019.xls

Company: Minnesota Energy Resources for report period ending: March, 2019

PAYMENT SCHEDULE (PS)

16	Number of "Right to Appeal" notices mailed to customers:	0
a)	Number of PS requests received	1,377
17	<i>Intentionally Blank</i>	
18	Number of PS negotiations mutually agreed upon:	1,377
19	<i>Intentionally Blank</i>	

DISCONNECTIONS

20	Number of disconnection notices mailed to customers:	9,598
21	Number of customer accounts disconnected who did not seek protection: Duplicate columns for use in April and October All other months, use 1st column only April 1-15 and October 1-15 in 1st column April 16-30 and October 16-31 in 2nd column	
a)	# Electric - heat affected	
b)	# Electric - heat not affected	
c)	# Gas - heat affected	228
d)	# Gas - heat not affected	
e)	Total # disconnected	228 0
22	Number of customer accounts disconnected seeking protection:	
a)	# Electric - heat affected	
b)	# Electric - heat not affected	
c)	# Gas - heat affected	
d)	# Gas - heat not affected	
e)	Total # disconnected (See Note)	0
23	Number of customer accounts disconnected for nonpayment (auto-calculation of #21e+ #22e):	228 228

Amended CWR Monthly March 2019.xls

Company: Minnesota Energy Resources for report period ending: March, 2019

DOLLAR VALUE

24	Total dollars past due on all residential accounts:	\$5,400,126
25	Average past due dollar amount per past due account (auto-calculation of #24 ÷ #2):	\$199
26	Total dollars received from energy assistance programs:	\$604,215
27	Total dollars received from other sources (private organizations):	\$0
28	Total Revenue from sales to residential accounts:	\$27,048,412
29	Average monthly residential bill: (auto-calculation of #28 ÷ #1)	\$126
30	<i>Intentionally Blank</i>	
31	Total residential account write-offs due to uncollectible:	\$164,343

DISCONNECTION DURATION

32	Number of customer accounts disconnected 24 hours or more:	
a)	# Electric - heat affected	
b)	# Electric - heat not affected	
c)	# Gas - heat affected	122
d)	# Gas - heat not affected	
e)	Total # disconnected	122
33	<i>Intentionally Blank</i>	
34	Number occupied heat-affected accounts disconnected 24 hours or more (to include customers who did and did not seek protection).	0
35	<i>Intentionally Blank</i>	
36	<i>Intentionally Blank</i>	

RECONNECTION DATA

37	# Accounts reconnected	100
38	# Accounts remaining disconnected	295
a)	1-30 days	128
b)	31-60 days	16
c)	61+ days	151

[END]

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Minnesota Public Utilities Commission

Minnesota Cold Weather Rule Compliance Questionnaire

Version 4.2

Company Submitting Reply:	Minnesota Energy Resources	▼
Reporting Year:	2019	▼
Reporting Period:	April	▼

Utility Monthly Reports (216B.091)

Company: Minnesota Energy Resources for report period ending: April, 2019

1	Number of Residential Customer Accounts:	214,439
2	Number of Past Due Residential Customer Accounts:	28,150
3	Number of Cold Weather Protection Requests:	1,403

RECONNECTION AT BEGINNING OF COLD WEATHER MONTHS

4	Number of "Right to Appeal" notices mailed to customers:	0
5	<i>Intentionally Blank</i>	
6	Number of customer accounts granted reconnection <u>request</u> :	271

INABILITY TO PAY (ITP)

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10% PLAN (TPP)

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Amended 2 CWR Monthly April 2019.xls

Company: Minnesota Energy Resources for report period ending: April, 2019

PAYMENT SCHEDULE (PS)

16	Number of "Right to Appeal" notices mailed to customers:	0
a)	Number of PS requests received	1,403
17	<i>Intentionally Blank</i>	
18	Number of PS negotiations mutually agreed upon:	1,403
19	<i>Intentionally Blank</i>	

DISCONNECTIONS

20	Number of disconnection notices mailed to customers:	10,329
21	Number of customer accounts disconnected who did not seek protection: Duplicate columns for use in April and October All other months, use 1st column only April 1-15 and October 1-15 in 1st column April 16-30 and October 16-31 in 2nd column	
a)	# Electric - heat affected	
b)	# Electric - heat not affected	
c)	# Gas - heat affected	218
d)	# Gas - heat not affected	509
e)	Total # disconnected	218 509
22	Number of customer accounts disconnected seeking protection:	
a)	# Electric - heat affected	
b)	# Electric - heat not affected	
c)	# Gas - heat affected	
d)	# Gas - heat not affected	
e)	Total # disconnected (See Note)	0
23	Number of customer accounts disconnected for nonpayment (auto-calculation of #21e+ #22e):	218 727

Amended 2 CWR Monthly April 2019.xls

Company: Minnesota Energy Resources for report period ending: April, 2019

DOLLAR VALUE

24	Total dollars past due on all residential accounts:	\$5,237,604
25	Average past due dollar amount per past due account (auto-calculation of #24 ÷ #2):	\$186
26	Total dollars received from energy assistance programs:	\$634,647
27	Total dollars received from other sources (private organizations):	\$0
28	Total Revenue from sales to residential accounts:	\$15,690,466
29	Average monthly residential bill: (auto-calculation of #28 ÷ #1)	\$73
30	<i>Intentionally Blank</i>	
31	Total residential account write-offs due to uncollectible:	\$269,467

DISCONNECTION DURATION

32	Number of customer accounts disconnected 24 hours or more:	
a)	# Electric - heat affected	
b)	# Electric - heat not affected	
c)	# Gas - heat affected	450
d)	# Gas - heat not affected	
e)	Total # disconnected	450
33	<i>Intentionally Blank</i>	
34	Number occupied heat-affected accounts disconnected 24 hours or more (to include customers who did and did not seek protection).	0
35	<i>Intentionally Blank</i>	
36	<i>Intentionally Blank</i>	

RECONNECTION DATA

37	# Accounts reconnected	271
38	# Accounts remaining disconnected	713
a)	1-30 days	440
b)	31-60 days	85
c)	61+ days	188

[END]

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Amended CWR Monthly May 2019.xls

Minnesota Public Utilities Commission

Minnesota Cold Weather Rule Compliance Questionnaire

Version 4.2

Company Submitting Reply:	Minnesota Energy Resources	▼
Reporting Year:	2019	▼
Reporting Period:	May	▼

Utility Monthly Reports (216B.091)

Company: Minnesota Energy Resources for report period ending: May, 2019

1	Number of Residential Customer Accounts:	213,688
2	Number of Past Due Residential Customer Accounts:	28,096
3	Number of Cold Weather Protection Requests:	

RECONNECTION AT BEGINNING OF COLD WEATHER MONTHS

4	Number of "Right to Appeal" notices mailed to customers:	
5	<i>Intentionally Blank</i>	
6	Number of customer accounts granted reconnection <u>request</u> :	

INABILITY TO PAY (ITP)

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10% PLAN (TPP)

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Amended CWR Monthly May 2019.xls

Company: Minnesota Energy Resources for report period ending: May, 2019

PAYMENT SCHEDULE (PS)

16	Number of "Right to Appeal" notices mailed to customers:	
a)	Number of PS requests received	
17	<i>Intentionally Blank</i>	
18	Number of PS negotiations mutually agreed upon:	
19	<i>Intentionally Blank</i>	

DISCONNECTIONS

20	Number of disconnection notices mailed to customers:		7,393
21	Number of customer accounts disconnected who did not seek protection: Duplicate columns for use in April and October All other months, use 1st column only April 1-15 and October 1-15 in 1st column April 16-30 and October 16-31 in 2nd column		
a)	# Electric - heat affected		
b)	# Electric - heat not affected		
c)	# Gas - heat affected	1,266	
d)	# Gas - heat not affected		
e)	Total # disconnected	1,266	0
22	Number of customer accounts disconnected seeking protection:		
a)	# Electric - heat affected		
b)	# Electric - heat not affected		
c)	# Gas - heat affected		
d)	# Gas - heat not affected		
e)	Total # disconnected (See Note)		0
23	Number of customer accounts disconnected for nonpayment (auto-calculation of #21e+ #22e):	1,266	1,266

Amended CWR Monthly May 2019.xls

Company: Minnesota Energy Resources for report period ending: May, 2019

DOLLAR VALUE

24	Total dollars past due on all residential accounts:	\$4,516,173
25	Average past due dollar amount per past due account (auto-calculation of #24 ÷ #2):	\$161
26	Total dollars received from energy assistance programs:	\$237,830
27	Total dollars received from other sources (private organizations):	\$0
28	Total Revenue from sales to residential accounts:	\$11,209,377
29	Average monthly residential bill: (auto-calculation of #28 ÷ #1)	\$52
30	<i>Intentionally Blank</i>	
31	Total residential account write-offs due to uncollectible:	\$204,331

DISCONNECTION DURATION

32	Number of customer accounts disconnected 24 hours or more:	
a)	# Electric - heat affected	
b)	# Electric - heat not affected	
c)	# Gas - heat affected	
d)	# Gas - heat not affected	
e)	Total # disconnected	0
33	<i>Intentionally Blank</i>	
34	Number occupied heat-affected accounts disconnected 24 hours or more (to include customers who did and did not seek protection).	
35	<i>Intentionally Blank</i>	
36	<i>Intentionally Blank</i>	

RECONNECTION DATA

37	# Accounts reconnected	531
38	# Accounts remaining disconnected	1,408
a)	1-30 days	791
b)	31-60 days	349
c)	61+ days	268

[END]

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Minnesota Public Utilities Commission

Minnesota Cold Weather Rule Compliance Questionnaire

Version 4.2

Company Submitting Reply:	Minnesota Energy Resources	▼
Reporting Year:	2019	▼
Reporting Period:	June	▼

Utility Monthly Reports (216B.091)

Company: Minnesota Energy Resources for report period ending: June, 2019

1	Number of Residential Customer Accounts:	213,071
2	Number of Past Due Residential Customer Accounts:	30,513
3	Number of Cold Weather Protection Requests:	

RECONNECTION AT BEGINNING OF COLD WEATHER MONTHS

4	Number of "Right to Appeal" notices mailed to customers:	
5	<i>Intentionally Blank</i>	
6	Number of customer accounts granted reconnection <u>request</u> :	

INABILITY TO PAY (ITP)

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10% PLAN (TPP)

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Amended CWR Monthly June 2019.xls

Company: Minnesota Energy Resources for report period ending: June, 2019

PAYMENT SCHEDULE (PS)

16	Number of "Right to Appeal" notices mailed to customers:	
a)	Number of PS requests received	
17	<i>Intentionally Blank</i>	
18	Number of PS negotiations mutually agreed upon:	
19	<i>Intentionally Blank</i>	

DISCONNECTIONS

20	Number of disconnection notices mailed to customers:	4,679
21	Number of customer accounts disconnected who did not seek protection: Duplicate columns for use in April and October All other months, use 1st column only April 1-15 and October 1-15 in 1st column April 16-30 and October 16-31 in 2nd column	
a)	# Electric - heat affected	
b)	# Electric - heat not affected	
c)	# Gas - heat affected	1,048
d)	# Gas - heat not affected	
e)	Total # disconnected	1,048 0
22	Number of customer accounts disconnected seeking protection:	
a)	# Electric - heat affected	
b)	# Electric - heat not affected	
c)	# Gas - heat affected	
d)	# Gas - heat not affected	
e)	Total # disconnected (See Note)	0
23	Number of customer accounts disconnected for nonpayment (auto-calculation of #21e+ #22e):	1,048 1,048

Amended CWR Monthly June 2019.xls

Company: Minnesota Energy Resources for report period ending: June, 2019

DOLLAR VALUE

24	Total dollars past due on all residential accounts:	\$4,706,967
25	Average past due dollar amount per past due account (auto-calculation of #24 ÷ #2):	\$154
26	Total dollars received from energy assistance programs:	\$95,502
27	Total dollars received from other sources (private organizations):	\$0
28	Total Revenue from sales to residential accounts:	\$6,432,928
29	Average monthly residential bill: (auto-calculation of #28 ÷ #1)	\$30
30	<i>Intentionally Blank</i>	
31	Total residential account write-offs due to uncollectible:	\$122,319

DISCONNECTION DURATION

32	Number of customer accounts disconnected 24 hours or more:	
a)	# Electric - heat affected	
b)	# Electric - heat not affected	
c)	# Gas - heat affected	
d)	# Gas - heat not affected	
e)	Total # disconnected	0
33	<i>Intentionally Blank</i>	
34	Number occupied heat-affected accounts disconnected 24 hours or more (to include customers who did and did not seek protection).	
35	<i>Intentionally Blank</i>	
36	<i>Intentionally Blank</i>	

RECONNECTION DATA

37	# Accounts reconnected	438
38	# Accounts remaining disconnected	2,008
a)	1-30 days	661
b)	31-60 days	744
c)	61+ days	603

[END]

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Minnesota Public Utilities Commission

Minnesota Cold Weather Rule Compliance Questionnaire

Version 4.2

Company Submitting Reply:	Minnesota Energy Resources	▼
Reporting Year:	2019	▼
Reporting Period:	July	▼

Utility Monthly Reports (216B.091)

Company: Minnesota Energy Resources for report period ending: July, 2019

1	Number of Residential Customer Accounts:	212,832
2	Number of Past Due Residential Customer Accounts:	27,244
3	Number of Cold Weather Protection Requests:	

RECONNECTION AT BEGINNING OF COLD WEATHER MONTHS

4	Number of "Right to Appeal" notices mailed to customers:	
5	<i>Intentionally Blank</i>	
6	Number of customer accounts granted reconnection <u>request</u> :	

INABILITY TO PAY (ITP)

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10% PLAN (TPP)

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CWR Monthly July 2019.xls

Company: Minnesota Energy Resources for report period ending: July, 2019

PAYMENT SCHEDULE (PS)

16	Number of "Right to Appeal" notices mailed to customers:	
a)	Number of PS requests received	
17	<i>Intentionally Blank</i>	
18	Number of PS negotiations mutually agreed upon:	
19	<i>Intentionally Blank</i>	

DISCONNECTIONS

20	Number of disconnection notices mailed to customers:		3,071
21	Number of customer accounts disconnected who did not seek protection: Duplicate columns for use in April and October All other months, use 1st column only April 1-15 and October 1-15 in 1st column April 16-30 and October 16-31 in 2nd column		
a)	# Electric - heat affected		
b)	# Electric - heat not affected		
c)	# Gas - heat affected	834	
d)	# Gas - heat not affected		
e)	Total # disconnected	834	0
22	Number of customer accounts disconnected seeking protection:		
a)	# Electric - heat affected		
b)	# Electric - heat not affected		
c)	# Gas - heat affected		
d)	# Gas - heat not affected		
e)	Total # disconnected (See Note)		0
23	Number of customer accounts disconnected for nonpayment (auto-calculation of #21e+ #22e):	834	834

CWR Monthly July 2019.xls

Company: Minnesota Energy Resources for report period ending: July, 2019

DOLLAR VALUE

24	Total dollars past due on all residential accounts:	\$3,072,754
25	Average past due dollar amount per past due account (auto-calculation of #24 ÷ #2):	\$113
26	Total dollars received from energy assistance programs:	\$6,091
27	Total dollars received from other sources (private organizations):	\$0
28	Total Revenue from sales to residential accounts:	\$4,354,361
29	Average monthly residential bill: (auto-calculation of #28 ÷ #1)	\$20
30	<i>Intentionally Blank</i>	
31	Total residential account write-offs due to uncollectible:	\$161,513

DISCONNECTION DURATION

32	Number of customer accounts disconnected 24 hours or more:	
a)	# Electric - heat affected	
b)	# Electric - heat not affected	
c)	# Gas - heat affected	
d)	# Gas - heat not affected	
e)	Total # disconnected	0
33	<i>Intentionally Blank</i>	
34	Number occupied heat-affected accounts disconnected 24 hours or more (to include customers who did and did not seek protection).	
35	<i>Intentionally Blank</i>	
36	<i>Intentionally Blank</i>	

RECONNECTION DATA

37	# Accounts reconnected	331
38	# Accounts remaining disconnected	2,673
a)	1-30 days	596
b)	31-60 days	645
c)	61+ days	1,432

[END]

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Minnesota Public Utilities Commission

Minnesota Cold Weather Rule Compliance Questionnaire

Version 4.2

Company Submitting Reply:	Minnesota Energy Resources	▼
Reporting Year:	2019	▼
Reporting Period:	August	▼

Utility Monthly Reports (216B.091)

Company: Minnesota Energy Resources for report period ending: August, 2019

1	Number of Residential Customer Accounts:	208,781
2	Number of Past Due Residential Customer Accounts:	27,618
3	Number of Cold Weather Protection Requests:	

RECONNECTION AT BEGINNING OF COLD WEATHER MONTHS

4	Number of "Right to Appeal" notices mailed to customers:	
5	<i>Intentionally Blank</i>	
6	Number of customer accounts granted reconnection <u>request</u> :	

INABILITY TO PAY (ITP)

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10% PLAN (TPP)

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CWR Monthly August 2019.xls

Company: Minnesota Energy Resources for report period ending: August, 2019

PAYMENT SCHEDULE (PS)

16	Number of "Right to Appeal" notices mailed to customers:	
a)	Number of PS requests received	
17	<i>Intentionally Blank</i>	
18	Number of PS negotiations mutually agreed upon:	
19	<i>Intentionally Blank</i>	

DISCONNECTIONS

20	Number of disconnection notices mailed to customers:	1,646
21	Number of customer accounts disconnected who did not seek protection: Duplicate columns for use in April and October All other months, use 1st column only April 1-15 and October 1-15 in 1st column April 16-30 and October 16-31 in 2nd column	
a)	# Electric - heat affected	
b)	# Electric - heat not affected	
c)	# Gas - heat affected	350
d)	# Gas - heat not affected	
e)	Total # disconnected	350 0
22	Number of customer accounts disconnected seeking protection:	
a)	# Electric - heat affected	
b)	# Electric - heat not affected	
c)	# Gas - heat affected	
d)	# Gas - heat not affected	
e)	Total # disconnected (See Note)	0
23	Number of customer accounts disconnected for nonpayment (auto-calculation of #21e+ #22e):	350 350

CWR Monthly August 2019.xls

Company: Minnesota Energy Resources for report period ending: August, 2019

DOLLAR VALUE

24	Total dollars past due on all residential accounts:	\$2,296,864
25	Average past due dollar amount per past due account (auto-calculation of #24 ÷ #2):	\$83
26	Total dollars received from energy assistance programs:	\$0
27	Total dollars received from other sources (private organizations):	\$0
28	Total Revenue from sales to residential accounts:	\$3,595,482
29	Average monthly residential bill: (auto-calculation of #28 ÷ #1)	\$17
30	<i>Intentionally Blank</i>	
31	Total residential account write-offs due to uncollectible:	\$170,223

DISCONNECTION DURATION

32	Number of customer accounts disconnected 24 hours or more:	
a)	# Electric - heat affected	
b)	# Electric - heat not affected	
c)	# Gas - heat affected	
d)	# Gas - heat not affected	
e)	Total # disconnected	0
33	<i>Intentionally Blank</i>	
34	Number occupied heat-affected accounts disconnected 24 hours or more (to include customers who did and did not seek protection).	
35	<i>Intentionally Blank</i>	
36	<i>Intentionally Blank</i>	

RECONNECTION DATA

37	# Accounts reconnected	195
38	# Accounts remaining disconnected	2,892
a)	1-30 days	266
b)	31-60 days	550
c)	61+ days	2,076

[END]

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Minnesota Public Utilities Commission

Minnesota Cold Weather Rule Compliance Questionnaire

Version 4.2

Company Submitting Reply:	Minnesota Energy Resources	▼
Reporting Year:	2019	▼
Reporting Period:	September	▼

Utility Monthly Reports (216B.091)

Company: Minnesota Energy Resources for report period ending: September, 2019

1	Number of Residential Customer Accounts:	209,017
2	Number of Past Due Residential Customer Accounts:	23,215
3	Number of Cold Weather Protection Requests:	

RECONNECTION AT BEGINNING OF COLD WEATHER MONTHS

4	Number of "Right to Appeal" notices mailed to customers:	
5	<i>Intentionally Blank</i>	
6	Number of customer accounts granted reconnection <u>request</u> :	

INABILITY TO PAY (ITP)

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10% PLAN (TPP)

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CWR Monthly September 2019.xls

Company: Minnesota Energy Resources for report period ending: September, 2019

PAYMENT SCHEDULE (PS)

16	Number of "Right to Appeal" notices mailed to customers:	
a)	Number of PS requests received	
17	<i>Intentionally Blank</i>	
18	Number of PS negotiations mutually agreed upon:	
19	<i>Intentionally Blank</i>	

DISCONNECTIONS

20	Number of disconnection notices mailed to customers:		722
21	Number of customer accounts disconnected who did not seek protection: Duplicate columns for use in April and October All other months, use 1st column only April 1-15 and October 1-15 in 1st column April 16-30 and October 16-31 in 2nd column		
a)	# Electric - heat affected		
b)	# Electric - heat not affected		
c)	# Gas - heat affected	249	
d)	# Gas - heat not affected		
e)	Total # disconnected	249	0
22	Number of customer accounts disconnected seeking protection:		
a)	# Electric - heat affected		
b)	# Electric - heat not affected		
c)	# Gas - heat affected		
d)	# Gas - heat not affected		
e)	Total # disconnected (See Note)		0
23	Number of customer accounts disconnected for nonpayment (auto-calculation of #21e+ #22e):	249	249

CWR Monthly September 2019.xls

Company: Minnesota Energy Resources for report period ending: September, 2019

DOLLAR VALUE

24	Total dollars past due on all residential accounts:	\$1,294,801
25	Average past due dollar amount per past due account (auto-calculation of #24 ÷ #2):	\$56
26	Total dollars received from energy assistance programs:	\$0
27	Total dollars received from other sources (private organizations):	\$0
28	Total Revenue from sales to residential accounts:	\$3,938,354
29	Average monthly residential bill: (auto-calculation of #28 ÷ #1)	\$19
30	<i>Intentionally Blank</i>	
31	Total residential account write-offs due to uncollectible:	\$137,801

DISCONNECTION DURATION

32	Number of customer accounts disconnected 24 hours or more:	
a)	# Electric - heat affected	
b)	# Electric - heat not affected	
c)	# Gas - heat affected	
d)	# Gas - heat not affected	
e)	Total # disconnected	0
33	<i>Intentionally Blank</i>	
34	Number occupied heat-affected accounts disconnected 24 hours or more (to include customers who did and did not seek protection).	
35	<i>Intentionally Blank</i>	
36	<i>Intentionally Blank</i>	

RECONNECTION DATA

37	# Accounts reconnected	102
38	# Accounts remaining disconnected	2,900
a)	1-30 days	232
b)	31-60 days	252
c)	61+ days	2,416

[END]

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Minnesota Public Utilities Commission

Minnesota Cold Weather Rule Compliance Questionnaire

Version 4.2

Company Submitting Reply:	Minnesota Energy Resources	▼
Reporting Year:	2019	▼
Reporting Period:	October	▼

Utility Monthly Reports (216B.091)

Company: Minnesota Energy Resources for report period ending: October, 2019

1	Number of Residential Customer Accounts:	210,286
2	Number of Past Due Residential Customer Accounts:	29,027
3	Number of Cold Weather Protection Requests:	923

RECONNECTION AT BEGINNING OF COLD WEATHER MONTHS

4	Number of "Right to Appeal" notices mailed to customers:	0
5	<i>Intentionally Blank</i>	
6	Number of customer accounts granted reconnection <u>request</u> :	19

INABILITY TO PAY (ITP)

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10% PLAN (TPP)

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CWR Monthly October 2019.xls

Company: Minnesota Energy Resources for report period ending: October, 2019

PAYMENT SCHEDULE (PS)

16	Number of "Right to Appeal" notices mailed to customers:	0
a)	Number of PS requests received	923
17	<i>Intentionally Blank</i>	
18	Number of PS negotiations mutually agreed upon:	923
19	<i>Intentionally Blank</i>	

DISCONNECTIONS

20	Number of disconnection notices mailed to customers:	678
21	Number of customer accounts disconnected who did not seek protection: Duplicate columns for use in April and October All other months, use 1st column only April 1-15 and October 1-15 in 1st column April 16-30 and October 16-31 in 2nd column	
a)	# Electric - heat affected	
b)	# Electric - heat not affected	
c)	# Gas - heat affected	67
d)	# Gas - heat not affected	5
e)	Total # disconnected	67 5
22	Number of customer accounts disconnected seeking protection:	
a)	# Electric - heat affected	
b)	# Electric - heat not affected	
c)	# Gas - heat affected	
d)	# Gas - heat not affected	
e)	Total # disconnected (See Note)	0
23	Number of customer accounts disconnected for nonpayment (auto-calculation of #21e+ #22e):	67 72

CWR Monthly October 2019.xls

Company: Minnesota Energy Resources for report period ending: October, 2019

DOLLAR VALUE

24	Total dollars past due on all residential accounts:	\$1,280,480
25	Average past due dollar amount per past due account (auto-calculation of #24 ÷ #2):	\$44
26	Total dollars received from energy assistance programs:	\$0
27	Total dollars received from other sources (private organizations):	\$0
28	Total Revenue from sales to residential accounts:	\$5,054,718
29	Average monthly residential bill: (auto-calculation of #28 ÷ #1)	\$24
30	<i>Intentionally Blank</i>	
31	Total residential account write-offs due to uncollectible:	\$195,574

DISCONNECTION DURATION

32	Number of customer accounts disconnected 24 hours or more:	
a)	# Electric - heat affected	
b)	# Electric - heat not affected	
c)	# Gas - heat affected	67
d)	# Gas - heat not affected	
e)	Total # disconnected	67
33	<i>Intentionally Blank</i>	
34	Number occupied heat-affected accounts disconnected 24 hours or more (to include customers who did and did not seek protection).	67
35	<i>Intentionally Blank</i>	
36	<i>Intentionally Blank</i>	

RECONNECTION DATA

37	# Accounts reconnected	19
38	# Accounts remaining disconnected	3,053
a)	1-30 days	57
b)	31-60 days	231
c)	61+ days	2,765

[END]

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Minnesota Public Utilities Commission

Minnesota Cold Weather Rule Compliance Questionnaire

Version 4.2

Company Submitting Reply:	Minnesota Energy Resources	▼
Reporting Year:	2019	▼
Reporting Period:	November	▼

Utility Monthly Reports (216B.091)

Company: Minnesota Energy Resources for report period ending: November, 2019

1	Number of Residential Customer Accounts:	211,891
2	Number of Past Due Residential Customer Accounts:	25,038
3	Number of Cold Weather Protection Requests:	941

RECONNECTION AT BEGINNING OF COLD WEATHER MONTHS

4	Number of "Right to Appeal" notices mailed to customers:	0
5	<i>Intentionally Blank</i>	
6	Number of customer accounts granted reconnection <u>request</u> :	1

INABILITY TO PAY (ITP)

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10% PLAN (TPP)

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CWR Monthly November 2019.xls

Company: Minnesota Energy Resources for report period ending: November, 2019

PAYMENT SCHEDULE (PS)

16	Number of "Right to Appeal" notices mailed to customers:	0
a)	Number of PS requests received	941
17	<i>Intentionally Blank</i>	
18	Number of PS negotiations mutually agreed upon:	941
19	<i>Intentionally Blank</i>	

DISCONNECTIONS

20	Number of disconnection notices mailed to customers:	819
21	Number of customer accounts disconnected who did not seek protection: Duplicate columns for use in April and October All other months, use 1st column only April 1-15 and October 1-15 in 1st column April 16-30 and October 16-31 in 2nd column	
a)	# Electric - heat affected	
b)	# Electric - heat not affected	
c)	# Gas - heat affected	12
d)	# Gas - heat not affected	
e)	Total # disconnected	12 0
22	Number of customer accounts disconnected seeking protection:	
a)	# Electric - heat affected	
b)	# Electric - heat not affected	
c)	# Gas - heat affected	
d)	# Gas - heat not affected	
e)	Total # disconnected (See Note)	0
23	Number of customer accounts disconnected for nonpayment (auto-calculation of #21e+ #22e):	12 12

CWR Monthly November 2019.xls

Company: Minnesota Energy Resources for report period ending: November, 2019

DOLLAR VALUE

24	Total dollars past due on all residential accounts:	\$1,538,986
25	Average past due dollar amount per past due account (auto-calculation of #24 ÷ #2):	\$61
26	Total dollars received from energy assistance programs:	\$542,975
27	Total dollars received from other sources (private organizations):	\$0
28	Total Revenue from sales to residential accounts:	\$12,114,592
29	Average monthly residential bill: (auto-calculation of #28 ÷ #1)	\$57
30	<i>Intentionally Blank</i>	
31	Total residential account write-offs due to uncollectible:	\$180,948

DISCONNECTION DURATION

32	Number of customer accounts disconnected 24 hours or more:	
a)	# Electric - heat affected	
b)	# Electric - heat not affected	
c)	# Gas - heat affected	7
d)	# Gas - heat not affected	
e)	Total # disconnected	7
33	<i>Intentionally Blank</i>	
34	Number occupied heat-affected accounts disconnected 24 hours or more (to include customers who did and did not seek protection).	7
35	<i>Intentionally Blank</i>	
36	<i>Intentionally Blank</i>	

RECONNECTION DATA

37	# Accounts reconnected	1
38	# Accounts remaining disconnected	2,964
a)	1-30 days	12
b)	31-60 days	56
c)	61+ days	2,896

[END]

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Minnesota Public Utilities Commission

Minnesota Cold Weather Rule Compliance Questionnaire

Version 4.2

Company Submitting Reply:	Minnesota Energy Resources	▼
Reporting Year:	2019	▼
Reporting Period:	December	▼

Utility Monthly Reports (216B.091)

Company: Minnesota Energy Resources for report period ending: December, 2019

1	Number of Residential Customer Accounts:	212,280
2	Number of Past Due Residential Customer Accounts:	26,684
3	Number of Cold Weather Protection Requests:	1,253

RECONNECTION AT BEGINNING OF COLD WEATHER MONTHS

4	Number of "Right to Appeal" notices mailed to customers:	0
5	<i>Intentionally Blank</i>	
6	Number of customer accounts granted reconnection <u>request</u> :	14

INABILITY TO PAY (ITP)

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CWR Monthly December 2019.xls

Company: Minnesota Energy Resources for report period ending: December, 2019

PAYMENT SCHEDULE (PS)

16	Number of "Right to Appeal" notices mailed to customers:	0
a)	Number of PS requests received	1,253
17	<i>Intentionally Blank</i>	
18	Number of PS negotiations mutually agreed upon:	1,253
19	<i>Intentionally Blank</i>	

DISCONNECTIONS

20	Number of disconnection notices mailed to customers:	1,609
21	Number of customer accounts disconnected who did not seek protection: Duplicate columns for use in April and October All other months, use 1st column only April 1-15 and October 1-15 in 1st column April 16-30 and October 16-31 in 2nd column	
a)	# Electric - heat affected	
b)	# Electric - heat not affected	
c)	# Gas - heat affected	47
d)	# Gas - heat not affected	
e)	Total # disconnected	47 0
22	Number of customer accounts disconnected seeking protection:	
a)	# Electric - heat affected	
b)	# Electric - heat not affected	
c)	# Gas - heat affected	
d)	# Gas - heat not affected	
e)	Total # disconnected (See Note)	0
23	Number of customer accounts disconnected for nonpayment (auto-calculation of #21e+ #22e):	47 47

CWR Monthly December 2019.xls

Company: Minnesota Energy Resources for report period ending: December, 2019

DOLLAR VALUE

24	Total dollars past due on all residential accounts:	\$2,525,957
25	Average past due dollar amount per past due account (auto-calculation of #24 ÷ #2):	\$95
26	Total dollars received from energy assistance programs:	\$637,361
27	Total dollars received from other sources (private organizations):	\$0
28	Total Revenue from sales to residential accounts:	\$19,426,879
29	Average monthly residential bill: (auto-calculation of #28 ÷ #1)	\$92
30	<i>Intentionally Blank</i>	
31	Total residential account write-offs due to uncollectible:	\$436,455

DISCONNECTION DURATION

32	Number of customer accounts disconnected 24 hours or more:	
a)	# Electric - heat affected	
b)	# Electric - heat not affected	
c)	# Gas - heat affected	37
d)	# Gas - heat not affected	
e)	Total # disconnected	37
33	<i>Intentionally Blank</i>	
34	Number occupied heat-affected accounts disconnected 24 hours or more (to include customers who did and did not seek protection).	0
35	<i>Intentionally Blank</i>	
36	<i>Intentionally Blank</i>	

RECONNECTION DATA

37	# Accounts reconnected	14
38	# Accounts remaining disconnected	3,002
a)	1-30 days	39
b)	31-60 days	12
c)	61+ days	2,951

[END]

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Service Extension Requests

NEW	Residential		Commercial	
	New Installs	Avg time between requested date and install	New Installs	Avg time between requested date and install
January	53	14	1	90
February	22	19	3	(14)
March	67	18	1	11
April	103	9	2	7
May	156	11	9	15
June	167	14	24	25
July	235	17	28	26
August	230	17	20	27
September	307	16	36	41
October	419	21	61	35
November	293	23	56	41
December	143	14	24	38

EXISTING	Residential			Commercial		
	# of Existing Requested	# completed as requested	Avg Days between request and Completion	# of Existing Requested	# completed as requested	Avg Days between request and Completion
January	186	184	-	22	21	-
February	95	94	-	10	10	-
March	114	113	-	10	10	-
April	245	242	-	12	12	-
May	352	350	-	21	20	-
June	386	381	-	14	14	-
July	497	495	-	14	14	-
August	523	523	-	26	26	-
September	852	851	-	39	39	-
October	1,931	1,924	-	178	177	-
November	751	746	-	116	115	-
December	258	255	-	34	33	-

Customer Complaints

	January				February				March				April				May				June			
Number of Complaints	54				34				53				73				73				51			
Type of Complaint	# of complaints Residential Class	% of complaints Residential Class	# of complaints Commercial Class	% of complaints Commercial Class	# of complaints Residential Class	% of complaints Residential Class	# of complaints Commercial Class	% of complaints Commercial Class	# of complaints Residential Class	% of complaints Residential Class	# of complaints Commercial Class	% of complaints Commercial Class	# of complaints Residential Class	% of complaints Residential Class	# of complaints Commercial Class	% of complaints Commercial Class	# of complaints Residential Class	% of complaints Residential Class	# of complaints Commercial Class	% of complaints Commercial Class	# of complaints Residential Class	% of complaints Residential Class	# of complaints Commercial Class	% of complaints Commercial Class
Billing/Meter Reading Issue	15	30%	1	25%	7	25%	1	17%	9	20%	1	14%	16	26%	0	0%	9	15%	0	0%	7	15%	3	75%
Meter Adjustment	0	0%	1	25%	1	4%	2	33%	1	2%	1	14%	1	2%	1	0%	5	8%	0	0%	4	9%	0	0%
Employee Action / Behavior Issue	0	0%	0	0%	0	0%	0	0%	1	2%	0	0%	0	0%	0	0%	2	3%	0	0%	1	2%	0	0%
"My bill is too high"	23	46%	2	50%	8	29%	1	17%	22	48%	4	57%	26	42%	7	64%	28	45%	7	64%	17	36%	0	0%
Service Extension Intervals	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	1	2%	0	0%	0	0%	0	0%	0	0%	0	0%
Service Quality	2	4%	0	0%	3	11%	0	0%	3	7%	0	0%	0	0%	0	0%	2	3%	1	9%	4	9%	0	0%
Service Restoration Intervals	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	1	2%	0	0%	1	2%	1	9%	0	0%	0	0%
Other	10	20%	0	0%	9	32%	2	33%	10	22%	1	14%	17	27%	3	27%	15	24%	2	18%	14	30%	1	25%
Time To Resolve Complaint																								
Initially	41				24				25				34				38				38			
Within 10 days	1				2				7				6				13				11			
> than 10 days	12				8				21				33				22				2			
Complaint Resolution	# Resolved by taking the listed action		% Resolved by taking the listed action		# Resolved by taking the listed action		% Resolved by taking the listed action		# Resolved by taking the listed action		% Resolved by taking the listed action		# Resolved by taking the listed action		% Resolved by taking the listed action		# Resolved by taking the listed action		% Resolved by taking the listed action		# Resolved by taking the listed action		% Resolved by taking the listed action	
Taking action as customer requested	51		94%		30		88%		50		94%		61		84%		61		84%		45		88%	
Agreeable compromise	2		4%		3		9%		1		2%		9		12%		10		14%		2		4%	
Not within the control of the utility	0		0%		0		0%		0		0%		0		0%		0		0%		1		2%	
Refuse to customer requested action	1		2%		1		3%		2		4%		3		4%		2		3%		3		6%	
BBB Complaints	0				0				1				0				1				1			
OAG Complaints	0				0				1				0				0				0			
PUC Complaints	3				1				4				9				3				3			

Customer Complaints

	July				August				September				October				November				December			
Number of Complaints	99				153				197				235				94				83			
Type of Complaint	# of complaints Residential Class	% of complaints Residential Class	# of complaints Commercial Class	% of complaints Commercial Class	# of complaints Residential Class	% of complaints Residential Class	# of complaints Commercial Class	% of complaints Commercial Class	# of complaints Residential Class	% of complaints Residential Class	# of complaints Commercial Class	% of complaints Commercial Class	# of complaints Residential Class	% of complaints Residential Class	# of complaints Commercial Class	% of complaints Commercial Class	# of complaints Residential Class	% of complaints Residential Class	# of complaints Commercial Class	% of complaints Commercial Class	# of complaints Residential Class	% of complaints Residential Class	# of complaints Commercial Class	% of complaints Commercial Class
Billing/Meter Reading Issue	29	33%	2	17%	31	23%	5	29%	50	29%	10	38%	54	26%	12	41%	29	38%	6	33%	33	45%	5	56%
Meter Adjustment	0	0%	0	0%	1	1%	0	0%	2	1%	0	0%	9	4%	1	3%	1	1%	1	6%	2	3%	0	0%
Employee Action / Behavior Issue	0	0%	0	0%	0	0%	1	6%	0	0%	0	0%	3	1%	0	0%	0	0%	0	0%	1	1%	0	0%
"My bill is too high"	22	25%	3	25%	50	37%	4	24%	32	19%	9	35%	28	14%	7	24%	13	17%	4	22%	22	30%	2	22%
Service Extension Intervals	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	1	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Service Quality	2	2%	1	8%	1	1%	0	0%	8	5%	0	0%	4	2%	0	0%	5	7%	0	0%	4	5%	1	11%
Service Restoration Intervals	1	1%	0	0%	2	1%	0	0%	0	0%	0	0%	2	1%	0	0%	0	0%	0	0%	0	0%	0	0%
Other	33	38%	6	50%	51	38%	7	41%	79	46%	7	27%	105	51%	9	31%	28	37%	7	39%	12	16%	1	11%
Time To Resolve Complaint																								
Initially	77				128				177				185				77				64			
Within 10 days	17				24				16				46				15				18			
> than 10 days	5				1				4				4				2				1			
Complaint Resolution	# Resolved by taking the listed action		% Resolved by taking the listed action		# Resolved by taking the listed action		% Resolved by taking the listed action		# Resolved by taking the listed action		% Resolved by taking the listed action		# Resolved by taking the listed action		% Resolved by taking the listed action		# Resolved by taking the listed action		% Resolved by taking the listed action		# Resolved by taking the listed action		% Resolved by taking the listed action	
Taking action as customer requested	88		89%		101		66%		125		63%		153		65%		60		64%		77		93%	
Agreeable compromise	11		11%		51		33%		66		34%		80		34%		30		32%		5		6%	
Not within the control of the utility	0		0%		0		0%		1		1%		0		0%		1		1%		0		0%	
Refuse to customer requested action	0		0%		1		1%		5		3%		2		1%		2		2%		1		1%	
BBB Complaints	4				0				2				0				2				0			
OAG Complaints	1				0				3				1				1				1			
PUC Complaints	6				3				2				9				4				2			

2019



Minnesota Public Utilities Commission
Consumer Affairs Office
121 7th Place East #350
St. Paul, MN 55101-2147

ANNUAL SUMMARY OF CUSTOMER COMPLAINTS

For Year End: 2019

Due May 1st Docket 377

In accordance with MINN. Reg. PSC 284

Name of Utility: Minnesota Energy Resources

Address: 2685 145th Street West, Rosemount, MN 55068

Prepared By: Nancy Lilienthal Phone: 651-322-8902

NUMBER OF DISCONNECTS FOR NON-PAYMENT

I. Complaint Type

A. Service

B. Billing

C. Rates

D. Rules

TOTAL COMPLAINTS

Residential		
Number Received	Number Resolved	Number Unresolved
438	438	0
316	316	0
0	0	0
291	291	0
1045	1045	0

Commercial/Industrial		
Number Received	Number Resolved	Number Unresolved
61	61	0
43	43	0
0	0	0
50	50	0
154	154	0

Interruptible		
Number Received	Number Resolved	Number Unresolved
0	0	0
0	0	0
0	0	0
0	0	0
0	0	0

- II. A. Number of Disconnections for Nonpayment
B. Number of Escrow Forms Filed (per PSC Rule 302G)
- III. A. Total Number of Customers (year end)
B. Number of Customer's Added During Year

	Commercial/Industrial	
Residential	Industrial	Interruptible
4,961	272	28
0	0	0
216,884	23,251	462
2,813	125	9

(By Month)

	1	2	3
JAN	90	2	0
FEB	38	1	1
MAR	228	39	0
APR	727	54	0
MAY	1266	60	14
JUNE	1048	35	5
JULY	834	46	4
AUG	350	12	2
SEPT	249	13	2
OCT	72	6	0
NOV	12	2	0
DEC	47	2	0
TOTAL	4,961	272	28

1. Residential
2. Commercial/Industrial
3. Interruptible

Telephone Answer Times

Answer time for gas emergency phone lines

	January	February	March	April	May	June	July	August	September	October	November	December
Total Calls	1,815	1,657	1,691	1,517	1,611	1,472	1,557	1,545	1,537	2,191	1,533	1,320
Average Speed of Answer	4	4	6	4	4	4	4	8	6	9	5	4
% Answered in 15 seconds	97.08%	96.62%	91.90%	96.31%	95.97%	96.47%	95.00%	90.00%	92.00%	88.77%	95.96%	97.27%

Tech Response Time From Time of Call to Arrival

	January	February	March	April	May	June	July	August	September	October	November	December
Calls responded to in Under 1 hour	625	685	715	530	575	525	499	567	454	664	549	505
Calls responded to in Over 1 hour	28	34	36	18	17	26	25	28	23	26	17	33
Total Calls	653	719	751	548	592	551	524	595	477	690	566	538

Calls Responded to in Under 1 Hour

	NW Region	NE Region	CN Region	SE Region	SW Region	Total
January	63	85	200	179	98	625
February	71	101	186	226	101	685
March	85	97	199	195	139	715
April	44	50	187	152	97	530
May	45	77	184	191	78	575
June	47	92	154	151	81	525
July	31	72	147	169	80	499
August	40	73	136	177	141	567
September	50	71	114	146	73	454
October	46	94	205	198	121	664
November	56	67	166	170	90	549
December	47	107	137	137	77	505
YTD Total	625	986	2015	2091	1176	6893

Month	MERC Emergency Response Time in Minutes
January	28.56
February	32.29
March	27.33
April	26.75
May	25.41
June	26.58
July	25.64
August	26.02
September	25.73
October	25.16
November	26.65
December	27.07
YTD Average	26.93

Calls Responded to in Over 1 Hour

	NW Region	NE Region	CN Region	SE Region	SW Region	Total
January	3	3	10	4	8	28
February	10	3	5	10	6	34
March	8	2	12	7	7	36
April	4	0	6	5	3	18
May	5	2	3	6	1	17
June	5	2	7	6	6	26
July	6	0	6	6	7	25
August	3	2	2	4	17	28
September	6	2	4	5	6	23
October	3	2	5	4	12	26
November	3	2	4	2	6	17
December	8	6	10	3	6	33
YTD Total	64	26	74	62	85	311

Tech Response Time From Time of Call to Arrival

	January	February	March	April	May	June	July	August	September	October	November	December
Calls responded to in Under 1 hour	616	679	709	521	561	503	484	552	438	655	544	500
Calls responded to in Over 1 hour	22	32	32	14	13	16	19	23	22	19	13	30
Total Calls	638	711	741	535	574	519	503	575	460	674	557	530

Calls Responded to in Under 1 Hour

	NW Region	NE Region	CN Region	SE Region	SW Region	Total
January	63	83	195	178	97	616
February	70	100	186	225	98	679
March	85	97	198	193	136	709
April	44	49	183	149	96	521
May	45	73	180	191	72	561
June	47	89	150	145	72	503
July	31	69	141	168	75	484
August	40	68	133	175	136	552
September	50	71	109	143	65	438
October	46	94	201	196	118	655
November	56	67	164	169	88	544
December	47	106	135	136	76	500
YTD Total	624	966	1975	2068	1129	6762

Calls Responded to in Over 1 Hour

	NW Region	NE Region	CN Region	SE Region	SW Region	Total
January	3	3	4	4	8	22
February	10	3	4	10	5	32
March	8	2	8	7	7	32
April	4	0	2	5	3	14
May	5	2	0	6	0	13
June	5	1	2	5	3	16
July	6	0	4	5	4	19
August	3	2	0	3	15	23
September	6	2	3	5	6	22
October	3	2	0	4	10	19
November	3	2	1	2	5	13
December	8	5	8	3	6	30
YTD Total	64	24	36	59	72	255

Month	MERC Emergency Response Time in Minutes (No Farm Taps)
January	27.78
February	32.10
March	27.01
April	26.07
May	24.67
June	25.37
July	24.88
August	25.33
September	25.49
October	24.47
November	26.26
December	26.69
YTD Average	26.34

Tech Response Time From Time of Call to Arrival

	January	February	March	April	May	June	July	August	September	October	November	December
Calls responded to in Under 1 hour	9	6	6	9	14	22	15	15	16	9	5	5
Calls responded to in Over 1 hour	6	2	4	4	4	10	6	5	1	7	4	3
Total Calls	15	8	10	13	18	32	21	20	17	16	9	8

Farm Tap Calls responded to in Under 1 hour

	NW Region	NE Region	CN Region	SE Region	SW Region	Total
January	0	2	5	1	1	9
February	1	1	0	1	3	6
March	0	0	1	2	3	6
April	0	1	4	3	1	9
May	0	4	4	0	6	14
June	0	3	4	6	9	22
July	0	3	6	1	5	15
August	0	5	3	2	5	15
September	0	0	5	3	8	16
October	0	0	4	2	3	9
November	0	0	2	1	2	5
December	0	1	2	1	1	5
YTD Total	1	20	40	23	47	131

Farm Tap Calls responded to in Over 1 hour

	NW Region	NE Region	CN Region	SE Region	SW Region	Total
January	0	0	6	0	0	6
February	0	0	1	0	1	2
March	0	0	4	0	0	4
April	0	0	4	0	0	4
May	0	0	3	0	1	4
June	0	1	5	1	3	10
July	0	0	2	1	3	6
August	0	0	2	1	2	5
September	0	0	1	0	0	1
October	0	0	5	0	2	7
November	0	0	3	0	1	4
December	0	1	2	0	0	3
YTD Total	0	2	38	3	13	56

Month	MERC Emergency Response Time in Minutes (Farm Taps Only)
January	61.64
February	49.00
March	51.17
April	55.04
May	48.91
June	46.21
July	44.05
August	45.89
September	32.28
October	54.28
November	50.78
December	52.26
YTD Average	49.29

Mislocates**Minnesota Energy Resources Corporation
2019 Gas Service Quality Report - Attachment 7**

	January	February	March	April	May	June	July	August	September	October	November	December	YTD
Total locates	1,988	1,379	2,299	10,212	15,826	13,349	13,542	13,944	11,838	12,701	6,265	2,368	105,711
Mislocates	1	0	0	0	6	6	9	10	2	3	1	1	39
% Mislocated	0.050%	0.000%	0.000%	0.000%	0.038%	0.045%	0.066%	0.072%	0.017%	0.024%	0.016%	0.042%	0.037%

Gas Lines Damaged

**Minnesota Energy Resources Corporation
2019 Gas Service Quality Report - Attachment 8**

	January	February	March	April	May	June	July	August	September	October	November	December	Total
Total	4	11	8	4	24	38	34	50	36	36	12	8	265
Fault of Company Employee or Company Contractor	1	2	0	1	8	12	11	15	2	3	2	2	59
Damage by Others	3	9	8	3	16	26	23	35	34	33	10	6	206
System issue	0	0	0	0	0	0	0	0	0	0	0	0	0

Damage per 100 miles of pipeline

5116.36 miles of pipe

	January	February	March	April	May	June	July	August	September	October	November	December	Total
By Others	0.06	0.18	0.16	0.06	0.31	0.51	0.45	0.68	0.66	0.64	0.20	0.12	4.03
Under MERC's Control	0.02	0.04	-	0.02	0.16	0.23	0.21	0.29	0.04	0.06	0.04	0.04	1.15

Service Interruptions
**Minnesota Energy Resources Corporation
2019 Gas Service Quality Report - Attachment 9**

Outages Due to Employees/Contractors	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Number of Customers:	-	1	-	6	11	9	8	22	2	5	1	3	68
Number of Outages:	-	1	-	1	7	8	6	10	2	3	1	2	41
Average Duration of Outage(In Minutes):	-	192	-	100	149	121	120	211	57	150	107	164	114

Outages Due to All Other Causes	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Number of Customers:	2	11	6	2	29	59	33	256	48	45	14	4	509
Number of Outages:	2	9	6	2	17	23	20	31	23	28	7	4	172
Average Duration of Outage(In Minutes):	270	200	155	209	133	203	151	194	468	108	227	229	212

PUBLIC DOCUMENT
PRIVATE DATA ON INDIVIDUALS
HAS BEEN EXCISED

[PRIVATE DATA BEGINS...

Date	Address	City	Number of Customers Affected	Outage Duration (Minutes)	Outage Caused by MERC Employee or MERC Contractor	Outage Caused by Other
1/9/2019			1	480	No	Yes
1/13/2019			1	60	No	Yes
2/12/2019			1	214	No	Yes
2/13/2019			2	470	No	Yes
2/13/2019			1	250	No	Yes
2/16/2019			1	110	No	Yes
2/18/2019			1	138	No	Yes
2/23/2019			1	192	Yes	No
2/25/2019			1	183	No	Yes
2/27/2019			2	144	No	Yes
2/28/2019			1	191	No	Yes
2/28/2019			1	100	No	Yes
3/3/2019			1	10	No	Yes
3/4/2019			1	90	No	Yes
3/7/2019			1	60	No	Yes
3/12/2019			1	220	No	Yes
3/13/2019			1	371	No	Yes
3/15/2019			1	180	No	Yes
4/19/2019			6	100	Yes	No
4/24/2019			1	328	No	Yes
4/26/2019			1	90	No	Yes
5/2/2019			1	119	Yes	No
5/2/2019			4	272	Yes	No
5/3/2019			1	120	No	Yes
5/3/2019			1	115	Yes	No
5/6/2019			1	131	No	Yes
5/7/2019			1	405	No	Yes
5/10/2019			1	83	No	Yes
5/13/2019			1	60	No	Yes
5/13/2019			1	150	No	Yes
5/14/2019			1	180	Yes	No
5/19/2019			1	120	No	Yes
5/20/2019			1	55	No	Yes
5/21/2019			2	190	Yes	No
5/21/2019			5	132	No	Yes
5/21/2019			1	110	No	Yes
5/22/2019			1	65	Yes	No
5/23/2019			1	230	No	Yes
5/23/2019			1	60	No	Yes
5/24/2019			6	210	No	Yes
5/25/2019			4	210	No	Yes
5/29/2019			1	85	No	Yes
5/29/2019			1	53	No	Yes

...PRIVATE DATA ENDS]

PUBLIC DOCUMENT
PRIVATE DATA ON INDIVIDUALS
HAS BEEN EXCISED

[PRIVATE DATA BEGINS...

5/29/2019		1	55	No	Yes
5/31/2019		1	100	Yes	No
6/2/2019		1	90	No	Yes
6/3/2019		1	123	No	Yes
6/3/2019		1	45	Yes	No
6/3/2019		5	330	No	Yes
6/4/2019		1	130	No	Yes
6/5/2019		1	127	No	Yes
6/5/2019		1	85	Yes	No
6/6/2019		1	102	Yes	No
6/6/2019		2	40	Yes	No
6/7/2019		1	480	No	Yes
6/7/2019		1	184	Yes	No
6/7/2019		1	1440	No	Yes
6/7/2019		1	45	No	Yes
6/10/2019		1	120	No	Yes
6/11/2019		9	425	No	Yes
6/12/2019		1	67	No	Yes
6/13/2019		1	30	No	Yes
6/18/2019		1	67	No	Yes
6/18/2019		1	90	No	Yes
6/18/2019		1	32	No	Yes
6/19/2019		1	120	No	Yes
6/20/2019		3	239	No	Yes
6/20/2019		1	70	No	Yes
6/24/2019		1	120	Yes	No
6/26/2019		1	90	No	Yes
6/27/2019		1	120	Yes	No
6/27/2019		1	120	No	Yes
6/28/2019		1	180	No	Yes
6/28/2019		23	95	No	Yes
6/29/2019		1	150	No	Yes
6/30/2019		1	275	Yes	No
7/1/2019		1	120	No	Yes
7/2/2019		1	353	No	Yes
7/3/2019		1	61	Yes	No
7/8/2019		1	60	No	Yes
7/9/2019		1	73	No	Yes
7/10/2019		1	44	No	Yes
7/10/2019		1	60	No	Yes
7/10/2019		1	120	No	Yes
7/11/2019		1	540	No	Yes
7/11/2019		1	120	Yes	No
7/12/2019		1	180	Yes	No
7/12/2019		10	90	No	Yes
7/12/2019		1	105	Yes	No
7/14/2019		1	1	No	Yes

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PRIVATE DATA ON INDIVIDUALS
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[PRIVATE DATA BEGINS...

7/18/2019		3	90	Yes	No
7/18/2019		1	167	No	Yes
7/18/2019		1	60	No	Yes
7/19/2019		1	85	No	Yes
7/22/2019		1	45	No	Yes
7/23/2019		2	40	No	Yes
7/24/2019		1	365	No	Yes
7/25/2019		1	71	No	Yes
7/27/2019		1	60	No	Yes
7/30/2019		1	284	No	Yes
7/31/2019		4	375	No	Yes
7/31/2019		1	163	Yes	No
8/1/2019		1	180	No	Yes
8/1/2019		3	84	No	Yes
8/2/2019		1	185	Yes	No
8/2/2019		1	120	No	Yes
8/6/2019		4	77	No	Yes
8/6/2019		1	22	No	Yes
8/6/2019		1	310	No	Yes
8/7/2019		1	37	No	Yes
8/7/2019		1	75	No	Yes
8/7/2019		1	73	Yes	No
8/7/2019		1	145	Yes	No
8/8/2019		1	18	No	Yes
8/9/2019		1	40	Yes	No
8/12/2019		1	4	No	Yes
8/12/2019		1	75	No	Yes
8/13/2019		7	240	Yes	No
8/14/2019		1	250	No	Yes
8/14/2019		1	195	No	Yes
8/14/2019		1	85	No	Yes
8/14/2019		1	345	Yes	No
8/15/2019		2	270	No	Yes
8/15/2019		1	215	No	Yes
8/16/2019		1	359	No	Yes
8/18/2019		216	1950	No	Yes
8/18/2019		1	60	No	Yes
8/20/2019		1	165	No	Yes
8/20/2019		1	334	No	Yes
8/21/2019		1	120	No	Yes
8/22/2019		1	54	No	Yes
8/22/2019		1	333	No	Yes
8/24/2019		1	120	No	Yes
8/26/2019		1	115	No	Yes
8/26/2019		3	240	Yes	No
8/27/2019		4	379	Yes	No

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HAS BEEN EXCISED

[PRIVATE DATA BEGINS...

8/27/2019		2	345	Yes	No
8/28/2019		1	37	No	Yes
8/29/2019		1	120	Yes	No
8/29/2019		1	13	No	Yes
8/29/2019		5	157	No	Yes
8/30/2019		1	155	No	Yes
8/30/2019		1	40	No	Yes
9/1/2019		1	28	No	Yes
9/3/2019		1	754	No	Yes
9/5/2019		1	461	No	Yes
9/5/2019		1	83	Yes	No
9/5/2019		1	45	No	Yes
9/6/2019		1	171	No	Yes
9/7/2019		1	30	Yes	No
9/10/2019		3	110	No	Yes
9/10/2019		1	396	No	Yes
9/16/2019		1	120	No	Yes
9/18/2019		1	72	No	Yes
9/19/2019		1	6122	No	Yes
9/20/2019		3	126	No	Yes
9/23/2019		1	150	No	Yes
9/23/2019		1	135	No	Yes
9/23/2019		1	155	No	Yes
9/24/2019		2	127	No	Yes
9/24/2019		3	1070	No	Yes
9/25/2019		1	180	No	Yes
9/26/2019		12	52	No	Yes
9/26/2019		1	71	No	Yes
9/27/2019		1	45	No	Yes
9/27/2019		8	29	No	Yes
9/30/2019		1	59	No	Yes
9/30/2019		1	280	No	Yes
10/1/2019		1	120	No	Yes
10/3/2019		4	183	No	Yes
10/4/2019		3	135	No	Yes
10/7/2019		2	245	No	Yes
10/7/2019		1	120	No	Yes
10/9/2019		1	330	Yes	No
10/9/2019		3	50	No	Yes
10/10/2019		1	1	Yes	No
10/11/2019		2	215	No	Yes
10/14/2019		1	0	No	Yes
10/15/2019		1	50	No	Yes
10/15/2019		1	0	No	Yes
10/16/2019		1	150	No	Yes

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[PRIVATE DATA BEGINS...

10/16/2019		1	132	No	Yes
10/16/2019		2	117	No	Yes
10/17/2019		3	120	Yes	No
10/17/2019		1	5	No	Yes
10/17/2019		1	120	No	Yes
10/18/2019		1	90	No	Yes
10/21/2019		1	95	No	Yes
10/21/2019		1	68	No	Yes
10/22/2019		1	28	No	Yes
10/25/2019		1	120	No	Yes
10/25/2019		1	120	No	Yes
10/26/2019		1	240	No	Yes
10/28/2019		8	40	No	Yes
10/29/2019		1	60	No	Yes
10/29/2019		1	104	No	Yes
10/31/2019		1	95	No	Yes
10/31/2019		1	202	No	Yes
10/31/2019		1	119	No	Yes
11/2/2019		1	120	No	Yes
11/8/2019		1	100	No	Yes
11/9/2019		1	65	No	Yes
11/10/2019		1	640	No	Yes
11/13/2019		1	155	No	Yes
11/15/2019		7	360	No	Yes
11/15/2019		2	150	No	Yes
11/25/2019		1	107	Yes	No
12/1/2019		1	60	No	Yes
12/4/2019		1	15	Yes	No
12/17/2019		2	313	Yes	No
12/19/2019		1	105	No	Yes
12/23/2019		1	120	No	Yes
12/30/2019		1	630	No	Yes

...PRIVATE DATA ENDS]

[PRIVATE DATA BEGINS...

PRIVATE DATA ON INDIVIDUALS HAS BEEN EXCISED

Date	Address	Outage Caused by	Number of Customers Affected	Number of People Evacuated	Outage Duration	Longest Time any Customer was without gas	Root Cause of Incident	Actions Taken to Fix Problem	Actions Taken to Contact Customers	Did Customer or Company Relight
2/12/2019		Vehicle Damage/ Snow Plow	1	7	214 Minutes	214 Minutes	Vehicle Damage to Facility	Checked for migration, secured the area and assisted NPL with squeezing service line.	Face to face contact	Company
2/16/2019		Van vs meter	1	0	60 Minutes	60 Minutes	Vehicle hit barricaded meter; cracking fitting on meter set. Gas from vehicle started on fire.	N/A. Service off due to total loss of building and no guarantee will be rebuilt in same location.	They were on site immediately after incident.	N/A
2/23/2019		Sledge hammer	1	7	192 Minutes	192 Minutes	Leaking riser had hard surface removed & service was spotted, but then struck by a NPL crew member with a sledge hammer.	Exposed service line in a safe area & squeeze was performed by Fire Department.	Customer On Site	Company
2/28/2019		Ice	1	18	100 Minutes	100 Minutes	Ice slid off roof of building; hit and snapped regulator head off.	Fire department shut off gas, tech replaced regulator and relit customer.	Customer On Site	Company
3/7/2019		Ice falling off of roof	1	1600	47 Minutes	47 Minutes	Ice fell off of roof breaking off telemetry sensing line on meter set.	MERC repaired sensing line and cleared ice off of set.	MERC is in contact with customer	Company

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[PRIVATE DATA BEGINS...

PRIVATE DATA ON INDIVIDUALS HAS BEEN EXCISED

Date	Address	Outage Caused by	Number of Customers Affected	Number of People Evacuated	Outage Duration	Longest Time any Customer was without gas	Root Cause of Incident	Actions Taken to Fix Problem	Actions Taken to Contact Customers	Did Customer or Company Relight
5/21/2019		Arvig Telecommunications/City of Wadena	5	40	132 Minutes	132 Minutes	City digging in area in conjunction with Arvig to install a new electric line. They spotted main gas line once and assumed it was at the same depth thru the alley. Chose not to do any additional spotting before they dug. Gas service line they hit changed elevation across the alley due to a past sewer project.	Fire dept. secured area and Wadena City electric assisted in digging bell hole out of gaseous area to squeeze off main.	All were businesses that were open and Techs communicated with them.	Company and customer
5/23/2019		No outage	0	0	N/A	No outage	Mini excavator hit line that was abandoned just below ground level.	Main was tapped & stopped on one side of leak. Existing stop was used on the other.	N/A	N/A

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[PRIVATE DATA BEGINS...

PRIVATE DATA ON INDIVIDUALS HAS BEEN EXCISED

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Date	Address	Outage Caused by	Number of Customers Affected	Number of People Evacuated	Outage Duration	Longest Time any Customer was without gas	Root Cause of Incident	Actions Taken to Fix Problem	Actions Taken to Contact Customers	Did Customer or Company Relight
5/29/2019		Odor other than natural gas	1	25-30 Evacuated at 15:42 (self-evacuated)	53 Minutes	53 Minutes	Building occupants complained of nausea and headaches. Thought they smelled natural gas and self evacuated. Merc technician investigated and found no natural gas.	MERC tech investigated. Building passed shut in test. Equipment passed co test. All piping checked. Barholing revealed no underground leak.	In person	Customer
5/29/2019		Natural Forces	1	15	55 Minutes	55 Minutes	Gasket	MERC employees completed inside and outside leak investigation, found no gas in structure, two minor leaks on meter set, MERC employees repaired the leaks and restored service.	In person	Customer
8/13/2019		Power auger	7	50	240 Minutes	240 Minutes	Facility not marked by USIC. Contractor was also digging under someone else's ticket.	MERC squeezed main, NPL made repairs, MERC relit customers.	Notified in person.	Company
8/14/2019		Excavator	1	20	250 Minutes	250 Minutes	Contractor not maintaining markings hit 2" PE main while digging for sewer and water.	Squeezed-off double-fed main in 2 spots. Npl replaced bad section of pipe.	Notified by door hanger.	Company

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[PRIVATE DATA BEGINS...

PRIVATE DATA ON INDIVIDUALS HAS BEEN EXCISED

Date	Address	Outage Caused by	Number of Customers Affected	Number of People Evacuated	Outage Duration	Longest Time any Customer was without gas	Root Cause of Incident	Actions Taken to Fix Problem	Actions Taken to Contact Customers	Did Customer or Company Relight
8/18/2019		Severe thunderstorm wind blowing tree over	216	200	1950 Minutes	1950 Minutes	A severe thunderstorm blew a tree over into our District regulator station.	Shut down drs. Had contractor rebuild drs.	Went door to door knocking, hung tags on doors for customers to call.	Company
8/26/2019		Trackhoe	1	0	115 Minutes	115 Minutes	Did not hand dig while excavating.	MERC made second squeeze, repaired line & relit customer.	Notified by door hanger.	Company
8/29/2019		Directional Bore rig	1	0	120 Minutes	120 Minutes	Facility Mismarked.	Service was squeezed to stop the leak, repairs made & customer was relit.	Customer contacted in person	Company
08/29/19		City of Int'l Falls excavator digging without spotting the service line	1	20	13 Minutes	TBD (customer is not using at this time)	City crew digging with powered equipment within the tolerance zone.	Service line was squeezed and capped by MERC. Final repair was arranged for a later date.	Spoke with customer about the issue.	Company
9/23/2019		Post puched through main	0	0	453 Minutes	N/A	Did not hand dig while excavating.	NPL double squeezed main, made repairs, tested pipe and restored service.	None	N/A
10/3/2019		Dig in	4	0	183 Minutes	1033 Minutes	Contractor hit our line with bore head. Locates were accurate.	Tech dug up main up wind of damage and squeezed off. Notified NPL of repair.	Knock on door and door tags.	1 left to relight at time of this report.
10/7/2019		Direction drill	2	0	245 Minutes	245 Minutes	Did not hand dig while excavating	MERC and NPL shut off one valve & made double squeeze to stop leak.	Contacted in person	Company

...PRIVATE DATA ENDS]

[PRIVATE DATA BEGINS...

PRIVATE DATA ON INDIVIDUALS HAS BEEN EXCISED

Date	Address	Outage Caused by	Number of Customers Affected	Number of People Evacuated	Outage Duration	Longest Time any Customer was without gas	Root Cause of Incident	Actions Taken to Fix Problem	Actions Taken to Contact Customers	Did Customer or Company Relight
10/17/2019		Boring Machine	3	30	120 Minutes	120 Minutes	Locating contractor did not follow direction on GSOC ticket. Boring crew hit an unmarked service line.	Service squeezed off to eliminate the blowing gas. Our contractor repaired the damaged service line.	All customers contacted. Event happened during normal business hours.	Company
10/26/2019		Fire	1	0	240 Minutes	240 Minutes	Wall of a structure fire collapsed on the meter set; shearing it off at the riser where escaping gas ignited.	MERC squeezed off service line and NPL was called in to repair service. Line was cross connected to feed a residential home.	MERC employee spoke to customer.	Company

...PRIVATE DATA ENDS]

192.1007(e)(1)iv

Number of Leaks either eliminated or repaired, categorized by cause

Leak Causes		Baseline Data										Baseline Average	Number of Leaks				10 yr Rolling Average				% Change from Baseline			
		2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2015	2016	2017	2018	2019	2016	2017	2018	2019	2016	2017	2018	2019
Corrosion	Main	7	4	2	5	4	2	4	1	1	2	3.2	11	6	1	12	3.6	3.8	3.7	4.4	12.50	18.75	15.63	37.50
	Service	26	34	22	37	25	23	19	12	12	16	22.6	30	15	26	32	23	21.1	21.5	21	1.77	-6.64	-4.87	-7.08
Natural Forces	Main	3	4	8	3	14	5	10	0	1	8	5.6	11	9	16	15	6.4	6.9	7.7	8.9	14.29	23.21	37.50	58.93
	Service	138	132	162	117	173	127	136	60	10	171	122.6	134	201	140	336	122.2	129.1	126.9	148.8	-0.33	5.30	3.51	21.37
Excavation	Main	49	44	29	36	30	21	19	32	25	32	31.7	30	44	41	37	29.8	29.8	31	31.1	-5.99	-5.99	-2.21	-1.89
	Service	158	144	124	109	107	106	134	97	107	145	123.1	152	135	152	163	122.5	121.6	124.4	129.8	-0.49	-1.22	1.06	5.44
Outside Force	Main	2	6	2	4	0	6	4	0	1	9	3.4	3	5	7	9	3.5	3.4	3.9	4.4	2.94	0.00	14.71	29.41
	Service	61	46	42	43	62	56	41	20	5	65	44.1	58	57	58	92	43.8	44.9	46.5	51.4	-0.68	1.81	5.44	16.55
Material or Welds	Main	9	7	8	5	10	3	14	6	7	10	7.9	12	17	8	5	8.2	9.2	9.2	9.2	3.80	16.46	16.46	16.46
	Service	146	113	132	139	119	130	184	141	205	153	146.2	214	122	82	168	153	153.9	148.9	151.8	4.65	5.27	1.85	3.83
Equipment	Main	16	9	17	13	8	22	20	15	10	15	14.5	11	6	5	8	14	13.7	12.5	12	-3.45	-5.52	-13.79	-17.24
	Service	209	240	256	303	331	309	305	247	304	278	278.2	304	277	395	909	287.7	291.4	305.3	365.9	3.41	4.74	9.74	31.52
Incorrect Operations	Main	1	3	1	1	3	6	2	4	3	4	2.8	1	2	2	3	2.8	2.7	2.8	3	0.00	-3.57	0.00	7.14
	Service	17	24	19	27	28	84	54	42	53	42	39	45	41	39	26	41.8	43.5	45.5	45.4	7.18	11.54	16.67	16.41
Other	Main	14	10	18	11	3	4	10	11	9	5	9.5	8	9	6	8	8.9	8.8	7.6	7.3	-6.32	-7.37	-20.00	-23.16
	Service	275	318	385	268	142	120	120	156	174	184	214.2	234	203	148	222	210.1	198.6	174.9	170.3	-1.91	-7.28	-18.35	-20.49
Totals	Main	101	87	85	78	72	69	83	69	57	85		87	98	86	97								
	Service	1030	1051	1142	1043	987	955	993	775	870	1054		1171	1051	1040	1948								

Established Baseline:

10-year average Leaks/Year (for each threat category and main/service location)

Effectiveness Criteria:

Moving 10-year average is an increase of 10% or more from established baseline

Source Data:

Raw data from Leak Logs.

192.1007(e)(1)i

Number of Hazardous Leaks either eliminated or repaired, categorized by cause

Leak Causes		Baseline Data										Baseline Average	Number of Leaks				Rolling Average				% Change from Baseline			
		2006	2007	2008	2009	2010	2011	2012	2013	2014	2015		2016	2017	2018	2019	2016	2017	2018	2019	2016	2017	2018	2019
Corrosion	Main	0	0	0	0	0	0	0	0	0	0	0.00	2	0	0	0	0.20	0.20	0.22	0.20	0.00	0.00	0.00	0.00
	Service	0	5	4	1	3	1	6	0	1	0	2.10	2	0	1	0	2.30	1.80	2.00	1.40	9.52	-14.29	-4.76	-33.33
Natural Forces	Main	0	2	0	0	1	0	0	0	0	0	0.30	0	1	1	0	0.30	0.20	0.22	0.30	0.00	-33.33	-25.93	0.00
	Service	1	1	3	2	3	2	0	2	0	3	1.70	4	3	3	5	2.00	2.20	2.11	2.50	17.65	29.41	24.18	47.06
Excavation	Main	23	25	9	14	16	7	10	15	9	12	14.00	14	15	11	10	13.10	12.10	12.11	11.90	-6.43	-13.57	-13.49	-15.00
	Service	33	35	29	14	17	9	22	7	12	16	19.40	14	18	14	8	17.50	15.80	15.78	13.70	-9.79	-18.56	-18.67	-29.38
Outside Force	Main	0	1	0	2	0	3	0	0	0	5	1.10	2	0	3	1	1.30	1.20	0.78	1.40	18.18	9.09	-29.29	27.27
	Service	3	5	6	1	6	5	4	0	0	9	3.90	5	4	8	8	4.10	4.00	3.44	4.90	5.13	2.56	-11.68	25.64
Material or Welds	Main	3	0	1	0	0	0	0	0	0	2	0.60	0	1	1	1	0.30	0.40	0.22	0.50	-50.00	-33.33	-62.96	-16.67
	Service	0	3	4	3	3	1	2	4	0	1	2.10	2	1	0	2	2.30	2.10	2.22	1.60	9.52	0.00	5.82	-23.81
Equipment	Main	1	1	2	2	0	5	2	1	2	0	1.60	0	0	0	0	1.50	1.40	1.56	1.00	-6.25	-12.50	-2.78	-37.50
	Service	6	9	9	2	3	6	7	2	3	1	4.80	1	3	4	4	4.30	3.70	4.00	3.40	-10.42	-22.92	-16.67	-29.17
Incorrect Operations	Main	0	0	0	1	0	1	1	0	0	0	0.30	0	0	0	0	0.30	0.30	0.33	0.20	0.00	0.00	11.11	-33.33
	Service	1	0	0	0	1	1	0	1	1	0	0.50	0	0	0	0	0.40	0.40	0.44	0.40	-20.00	-20.00	-11.11	-20.00
Other	Main	4	1	1	0	1	2	0	0	1	0	1.00	1	1	1	0	0.70	0.70	0.78	0.70	-30.00	-30.00	-22.22	-30.00
	Service	4	2	8	10	5	3	4	1	5	0	4.20	4	3	0	1	4.20	4.30	4.78	2.60	0.00	2.38	13.76	-38.10
Totals	Main	31	30	13	19	18	18	13	16	12	19		19	18	17	12								
	Service	48	60	63	33	41	28	45	17	22	30		32	32	30	28								

Established Baseline:

10-year average Leaks/Year (for each threat category and main/service location)
5-year average Leaks/Year (for threat category equipment)

Effectiveness Criteria:

Moving 10-year average is an increase of 10% or more from established baseline

Source Data:

Raw data from Leak Logs.

192.1007(e)(1)v

Number of Hazardous Leaks either eliminated or repaired, categorized by material

Material		Baseline Data										Baseline Average	Number of Leaks				10 yr Rolling Average				% Change from Baseline			
		2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2015	2016	2017	2018	2019	2016	2017	2018	2019	2016	2017	2018	2019
Steel-Bare	Main	1	1	1	0	1	0	0	0	2	1	0.70	2	1	1	0	0.80	0.80	0.80	0.80	14.29	14.29	14.29	14.29
	Service	3	9	9	4	5	3	0	1	4	2	4.00	5	3	2	5	4.20	3.60	2.90	3.00	5.00	-10.00	-27.50	-25.00
Steel-Coated	Main	3	5	1	7	1	3	0	3	2	2	2.70	5	1	1	2	2.90	2.50	2.50	2.00	7.41	-7.41	-7.41	-25.93
	Service	2	6	5	7	7	6	1	1	1	6	4.20	4	2	3	4	4.40	4.00	3.80	3.50	4.76	-4.76	-9.52	-16.67
Polythylene (PE)	Main	26	24	10	12	14	13	12	13	7	13	14.40	12	13	13	8	13.00	11.90	12.20	11.80	-9.72	-17.36	-15.28	-18.06
	Service	39	39	35	17	18	12	42	11	12	19	24.40	16	18	18	12	22.10	20.00	18.30	17.80	-9.43	-18.03	-25.00	-27.05
Other Plastic	Main	0	0	0	0	1	0	0	0	0	3	0.40	0	2	0	1	0.40	0.60	0.60	0.70	0.00	50.00	50.00	75.00
	Service	0	0	1	2	2	0	0	0	1	0	0.60	1	3	2	2	0.70	1.00	1.10	1.10	16.67	66.67	83.33	83.33
X-trube	Main	0	0	0	0	0	0	0	0	0	0	0.00	0	0	0	0	0.00	0.00	0.00	0.00	-	-	-	-
	Service	0	0	1	1	1	2	0	0	0	1	0.60	1	0	0	0	0.70	0.70	0.60	0.50	16.67	16.67	0.00	-16.67
Other	Main	0	0	0	0	0	1	1	0	0	0	0.20	0	0	1	1	0.20	0.20	0.30	0.40	0.00	0.00	50.00	100.00
	Service	0	2	6	2	5	3	1	1	2	1	2.30	4	5	5	3	2.70	3.00	2.90	3.00	17.39	30.43	26.09	30.43
Copper	Main	0	0	0	0	0	0	0	0	0	0	0.00	0	0	0	0	0.00	0.00	0.00	0.00	-	-	-	-
	Service	1	0	0	0	1	0	0	0	0	0	0.20	0	0	0	0	0.10	0.10	0.10	0.10	-50.00	-50.00	-50.00	-50.00
Ductile/Wrought Iron	Main	0	0	0	0	0	0	0	0	0	0	0.00	0	0	0	0	0.00	0.00	0.00	0.00	-	-	-	-
	Service	0	1	0	0	2	0	0	3	0	0	0.60	0	0	0	0	0.60	0.50	0.50	0.50	0.00	-16.67	-16.67	-16.67
Cast Iron	Main	0	0	0	0	1	0	0	0	0	0	0.10	0	0	0	0	0.10	0.10	0.10	0.10	0.00	0.00	0.00	0.00
	Service	0	0	0	0	0	0	0	0	0	0	0.00	0	0	0	0	0.00	0.00	0.00	0.00	-	-	-	-
Aluminum	Main	0	0	0	0	0	0	0	0	0	0	0.00	0	0	0	0	0.00	0.00	0.00	0.00	-	-	-	-
	Service	1	0	3	0	0	1	1	0	1	0	0.70	0	0	0	1	0.60	0.60	0.30	0.40	-14.29	-14.29	-57.14	-42.86
Gasket Material	Main	0	0	0	0	0	1	0	0	1	0	0.20	0	1	1	0	0.20	0.30	0.40	0.40	0.00	50.00	100.00	100.00
	Service	2	1	2	0	0	1	0	0	1	1	0.80	1	1	0	0	0.70	0.70	0.50	0.50	-12.50	-12.50	-37.50	-37.50
Polyvinylechloride (PVC)	Main	1	0	1	0	0	0	0	0	0	0	0.20	0	0	0	0	0.10	0.10	0.00	0.00	-50.00	-50.00	-100.00	-100.00
	Service	0	0	0	0	0	0	0	0	0	0	0.00	0	0	0	0	0.00	0.00	0.00	0.00	-	-	-	-
Brass	Main	0	0	0	0	0	0	0	0	0	0	0.00	0	0	0	0	0.00	0.00	0.00	0.00	-	-	-	-
	Service	0	2	1	0	0	0	0	0	0	0	0.30	0	0	0	0	0.30	0.10	0.00	0.00	0.00	-66.67	-100.00	-100.00
Totals	Main	31	30	13	19	18	18	13	16	12	19		19	18	17	12								
	Service	48	60	63	33	41	28	45	17	22	30		32	32	30	27								

Established Baseline:10-year average Leaks/Year (for each threat category and main/service location)

Effectiveness Criteria:Moving 10-year average is an increase of 10% or more from established baseline

Source Data: Raw data from Leak Logs.

Note: Material choices removed from 2015 leak log repair form (159-7004)

- Polyvinylchloride (PVC)
- Cast Iron

192.1007 (e)(ii)	Number of Excavation Damages
192.1007 (e)(iii)	Number of excavation tickets
192.1007(e)(1)vi	Any additional measures the operator determines are needed to evaluate the effectiveness of the operator's IM program

	Baseline Data					Baseline Average	Number of Damages					5-Year Average					% Change from Baseline				
	2010	2011	2012	2013	2014	2014	2015	2016	2017	2018	2019	2015	2016	2017	2018	2019	2015	2016	2017	2018	2019
Excavation Damages - 3rd party	153	178	127	172	142	154	191	220	201	210	198	162	170	185	193	204	4.92	10.36	19.95	24.87	32.12
Excavation Damages - 1st/2nd party	0	2	3	7	11	5	12	14	11	17	36	7	9	11	13	18	52.17	104.35	139.13	182.61	291.30
Excavation Tickets	69,259	69,971	76,457	78,822	84,446	75,791	95,587	99,309	101,266	98,514	103,959	81,057	86,924	91,886	95,824	99,727	6.95	14.69	21.24	26.43	31.58
Damages per 1,000 tickets -3rd	2.21	2.54	1.66	2.18	1.68	2.04	2.00	2.22	1.98	2.13	1.90	2.00	1.96	2.02	2.01	2.05	-1.89	-3.77	-1.06	-1.24	0.41
Damages per 1,000 tickets -1st/2nd	0.00	0.03	0.04	0.09	0.13	0.06	0.13	0.14	0.11	0.17	0.35	0.09	0.11	0.12	0.14	0.18	42.29	78.18	97.24	123.53	197.39

Number of Excavation Damages	
Established Baseline	5-year average damages/year
Effectiveness Criteria:	Moving 5-year average in an increase of 10% or more from established baseline

Number of Excavation Tickets	
Established Baseline	5-Year average excavation tickets/year
Effectiveness Criteria:	Moving 5-year average in an increase of 10% or more from established baseline

Number of Excavation Damages per 1,000 Tickets	
Established Baseline	5-Year average excavation damages per 1,000 tickets
Effectiveness Criteria:	Moving 5-year average in an increase of 10% or more from established baseline

Source Data	
Damages Data:	Raw data from Accident Database
Ticket Data:	Raw data from GSOC ticket summary

2019 note: 28 of 36 damages for 1st/2nd party are due to USIC mislocates.

*Baseline data used 5-year 2010-2014. Damages outside of those caused by leaks were not tracked prior to 2010.

192.1007(e)(1)vi	Any additional measures the operator determines are needed to evaluate the effectiveness of the operator's IM program
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Threat: External corrosion - steel

Performance Measure: Frequency of leaks on Steel Main per mile of main
Frequency of leaks per 1000 service lines

External Corrosion - All Steel		Baseline Data					Baseline Average	Number of Leaks					5-year average					% Change from Baseline				
		2010	2011	2012	2013	2014		2015	2016	2017	2018	2019	2015	2016	2017	2018	2019	2015	2016	2017	2018	2019
Leaks	Main	4	1	4	1	0	2.00	2	11	6	1	11	1.60	3.60	4.00	4.00	6.20	-20.00	80.00	100.00	100.00	210.00
	Service	8	4	6	0	5	4.60	7	15	3	10	12	4.40	6.60	6.00	8.00	9.40	-4.35	43.48	30.43	73.91	104.35
Miles of Main		1560	1542	1517	1513	1510	1528.40	1499	1481	1461	1441	1436.12	1516.20	1504.00	1492.80	1478.40	1463.62	-0.80	-1.60	-2.33	-3.27	-4.24
# of steel Services		45,246	44,263	43,297	42,844	42,705	43,671.00	42,907	41,564	40,268	39,302	38,834	43,203.20	42,663.40	42,057.60	41,349.20	40575.00	-1.07	-2.31	-3.69	-5.32	-7.09
Leaks per 100 Mile of Main		0.26	0.06	0.26	0.07	0.00	0.130	0.13	0.74	0.41	0.07	0.77	0.11	0.24	0.27	0.27	0.50	-18.89	85.23	107.81	108.32	281.85
Leaks per 1000 service lines		0.18	0.09	0.14	0.00	0.12	0.10	0.16	0.36	0.07	0.25	0.31	0.10	0.16	0.14	0.19	0.25	-2.61	49.13	36.87	85.54	138.80

Effectiveness Criteria: Moving 5-year average is an increase of 10% or more from established baseline

Source Data: Raw data from Leak Logs.
GIS main data reported annually
Service line totals by year.

192.1007(e)(1)vi	Any additional measures the operator determines are needed to evaluate the effectiveness of the operator's IM program
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Threat: External corrosion - Cathodically Protected Coated Steel Main

Performance Measure: Frequency of Leaks on Cathodically Protected Steel Main

Frequency of leaks per 1000 Cathodically Protected Steel services

External Corrosion - Coated Steel		Baseline Data					Baseline Average	Number of Leaks					5-year average					% Change from Baseline				
		2010	2011	2012	2013	2014		2015	2016	2017	2018	2019	2015	2016	2017	2018	2019	2015	2016	2017	2018	2019
Leaks	Main	0	0	4	1	0	1.00	2	11	6	1	11	1.40	3.60	4.00	4.00	6.20	40.00	260.00	300.00	300.00	520.00
	Service	2	0	2	0	1	1.00	3	6	2	5	10	1.20	2.40	2.40	3.40	5.20	20.00	140.00	140.00	240.00	420.00
Miles of Coated Main		1534	1519	1506	1504	1504	1513.40	1499	1481	1461	1441	1436	1506	1499	1490	1477	1455	-0.46	-0.96	-1.56	-2.39	-3.87
# of Coated steel Services		44,955	43,353	44,433	43,473	43,090	43,860.80	42,976	43,178	41,835	40,539	38,834	43,465	43,430	42,910	42,324	41,097	-0.90	-0.98	-2.17	-3.50	-6.30
Leaks per 100 Mile of Main		0.00	0.00	0.27	0.07	0.00	0.07	0.13	0.74	0.41	0.07	0.77	0.09	0.24	0.27	0.27	0.42	40.18	263.83	307.51	308.39	539.03
Leaks per 1000 service lines		0.04	0.00	0.05	0.00	0.02	0.02	0.07	0.14	0.05	0.12	0.26	0.03	0.06	0.06	0.08	0.13	22.46	145.75	148.24	257.67	465.55

Established Baseline:

5-year average Leaks/Year (for each threat category and main/service location)

5-year average Leaks/Year (for threat category equipment)

Effectiveness Criteria:

Moving 5-year average is an increase of 10% or more from established baseline

Source Data:

Raw data from Leak Logs.

GIS main data reported annually

Service line totals by year.

192.1007(e)(1)vi	Any additional measures the operator determines are needed to evaluate the effectiveness of the operator's IM program
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Threat:

Performance Measure:

External corrosion - Unprotected Bare Steel
Frequency of Leaks on UnProtected Bare Steel Main
Frequency of leaks per 1000 UnProtected Bare Steel services

External Corrosion - Bare Steel		Baseline Data					Baseline Average	Number of Leaks					5-year average					% Change from Baseline				
		2010	2011	2012	2013	2014		2015	2016	2017	2018	2019	2015	2016	2017	2018	2019	2015	2016	2017	2018	2019
Leaks	Main	4	1	0	0	0	1.00	0	0	0	0	0	0.20	0.00	0.00	0.00	0.00	-80.00	-100.00	-100.00	-100.00	-100.00
	Service	2	1	4	0	1	1.60	4	6	1	3	1	2.00	3.00	2.40	3.00	3.00	25.00	87.50	50.00	87.50	87.50
Miles of Bare Main		26	23	11	8	6	14.80	0	0	0	0	0	9.60	5.00	2.80	1.20	0.00	-35.14	-66.22	-81.08	-91.89	-100.00
# of Bare steel Services		291	181	101	95	25	138.60	0	0	0	0	0	80.40	44.20	24.00	5.00	0.00	-41.99	-68.11	-82.68	-96.39	-100.00
Leaks per Mile of Main		0.15	0.04	0.00	0.00	0.00	0.04	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	-77.97	-100.00	-100.00	-100.00	-100.00
Leaks per 1000 service lines		6.87	5.52	39.60	0.00	40.00	18.40	0.00	0.00	0.00	0.00	0.00	17.03	15.92	8.00	8.00	0.00	-7.47	-13.48	-56.52	-56.52	-100.00

Established Baseline:

Effectiveness Criteria:

5-year average Leaks/Year (for each threat category and main/service location)
5-year average Leaks/Year (for threat category equipment)

Moving 5-year average is an increase of 10% or more from established baseline

Source Data:

Raw data from Leak Logs.
GIS main data reported annually
Service line totals by year.

Note: Bare steel that was known was replaced as part of a replacement program. As we see choices for Bare Steel on our leak form for Material Leaking, we are leaving this metric in place.

192.1007(e)(1)vi	Any additional measures the operator determines are needed to evaluate the effectiveness of the operator's IM program
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Threat: Atmospheric corrosion - meter sets

Performance Measure: Frequency of leaks per 10,000 meter sets per year

	Baseline Data					Baseline Average	Number of Leaks					5-year average					% Change from Baseline				
	2010	2011	2012	2013	2014		2015	2016	2017	2018	2019	2015	2016	2017	2018	2019	2015	2016	2017	2018	2019
Leaks due to A/C on meter sets	17	19	13	12	7	13.60	9	15	12	16	19	12.00	11.20	11.00	11.80	14.20	-11.76	-17.65	-19.12	-13.24	4.41
Number of meter sets	211,090	211,729	213,336	215,414	215,794	213,472.60	230,531	232,724	235,381	238,144	240,919	217,361	221,560	225,969	230,515	235,540	1.82	3.79	5.85	7.98	10.34
Leaks per 10,000 meter sets	0.81	0.90	0.61	0.56	0.32	0.64	0.39	0.64	0.51	0.67	0.79	0.56	0.51	0.49	0.51	0.60	-12.99	-20.91	-24.03	-20.43	-5.90

Established Baseline: 5-year average Leaks/Year (for each threat category and main/service location)
5-year average Leaks/Year (for threat category equipment)

Effectiveness Criteria: Moving 5-year average is an increase of 10% or more from established baseline

Source Data: Raw data from Leak Logs.
GIS main data reported annually
Service line totals by year.
Meter Set information from Open CIS annually.

192.1007(e)(1)vi

Any additional measures the operator determines are needed to evaluate the effectiveness of the operator's IM program

Key Performance Metrics - Section 9.3.1 in Distribution Integrity Management Plan

	Baseline Data					Baseline Average 2014	Data					5-year average					% Change from Baseline				
	2010	2011	2012	2013	2014		2015	2016	2017	2018	2019	2015	2016	2017	2018	2019	2015	2016	2017	2018	2019
Average employee response time (minutes) to customer or public reports of a natural gas odor	26.78	26.93	29.53	28.41	27.74	27.88	27.00	27.99	28.15	26.70	26.93	27.92	28.1	27.9	27.5	27.35	0.16	0.92	-0.07	-1.30	-1.88
% of customer and public odor complaints with employee response times less than 60 minutes	95.38	95.46	93.23	94.47	94.68	94.64	95.93	95.82	95.24	95.60	95.68	94.75	94.8	95.2	95.5	95.7	0.12	0.19	0.62	0.86	1.07
% of leaks eliminated or repaired within the time period of one year	98.21	96.19	94.42	99.76	94.61	96.64	95.17	97.69	97.13	95.56	96.63	96.03	96.33	96.87	96.03	96.44	-0.63	-0.32	0.24	-0.63	-0.21

Established Baseline: 5-year average of leaks over 365 days to repair
Effectiveness Criteria: Moving 5-year average is an increase of 10% or more from established baseline.

Customer Service Related Operations and Maintenance Expenses

O&M expenses FERC Account 901 and 903 plus payroll taxes and benefits

January	February	March	April	May	June	July	August	September	October	November	December	Total
\$ 446,821	\$ 460,141	\$ 537,712	\$ 497,786	\$ 472,185	\$ 740,743	\$ 519,612	\$ 457,583	\$ 486,373	\$ 578,211	\$ 195,260	\$ 513,981	\$ 5,906,408

FERC Account	<u>901000</u>	<u>903000</u>	
January	\$ 40,927	\$ 405,894	
February	\$ 29,845	\$ 430,296	
March	\$ 33,551	\$ 504,161	
April	\$ 36,176	\$ 461,610	
May	\$ 23,902	\$ 448,283	
June	\$ 20,213	\$ 720,530	
July	\$ 18,847	\$ 500,765	
August	\$ (22,863)	\$ 480,446	
September	\$ 16,901	\$ 469,472	
October	\$ 19,280	\$ 558,931	
November	\$ 16,903	\$ 178,357	
December	\$ 11,542	\$ 502,439	
	<u>\$ 245,223</u>	<u>\$ 5,661,185</u>	\$ 5,906,408

Attachment 13 MERC Improved Customer Experience Performance Indicators (2019)

Performance Indicator Metric	2013-2015 Performance Average	2016 Performance	1st Quartile (Entry Point)	2nd Quartile (Entry Point)	Target Performance (End of 2019)	2017 Performance	2017 Statistically Adjusted Performance	2018 Performance	2018 Statistically Adjusted Performance	2019 Performance	2019 Statistically Adjusted Performance	Aspects of ICE Contributing to Continuous Improvement	Barriers to Increased Achievement in 2019	Expectations for Future Performance
Customer Transaction Satisfaction (%)	62%	83.6%	82.0%	72.0%	Continued improvement from pre-ICE baseline levels, driving toward first quartile performance. Going forward, as the industry continues to evolve, we find different ways to measure and gain customer insights. Our means to gauge customer feedback has changed and we are seeing a better sampling of our customer demographics and number of participants to survey. Our focus is to improve performance while balancing other external and internal factors that may impact customer satisfaction. We do not measure our satisfaction with our CIS system only, we use this metric to identify process improvement opportunities and root causes to dissatisfaction. Items like gas prices, branding, internal processes, regulated processes, etc. can impact customer satisfaction.	78.50%	86.80%	78.60%	86.90%	77.40%	85.70%	Improved customer service processes and systems; improved self-service options for customers; efficiency and effectiveness of our customer service identification and resolution process through improved Care Center tools.	In 2017, a change was made from telephone to e-mail surveys (research indicates that while e-mail surveys result in higher response rates and more participation, overall satisfaction reported tends to be lower as customer have more time to consider and provide more candid feedback than they would to a person over the phone). Email surveys continued in 2019. Measurement can be very subjective and impacted by the mode of survey and other factors. Extreme weather conditions in the 1st quarter in 2019, caused higher than normal estimates and high bills, in turn causing lower satisfactions levels in the first half of 2019.	Continued improvement from pre-ICE baseline levels, driving toward first quartile performance. Going forward, as the industry continues to evolve, we find different ways to measure and gain customer insights. Our means to gauge customer feedback has changed and we are seeing a better sampling of our customer demographics and number of participants to survey. Our focus is to improve performance while balancing other external and internal factors that may impact customer satisfaction. We do not measure our satisfaction with our CIS system only, we use this metric to identify process improvement opportunities and root causes to dissatisfaction. Items like gas prices, branding, internal processes, regulated processes, etc. can impact customer satisfaction.
Residential First Call Resolution (%)	80.67%	81.78%	85%	79%	Maintain achievements (2018 achieved first quartile performance)	83.30%	N/A	91.50%	N/A	91.40%	N/A	Improved customer service processes and systems; improved call escalation processes	None	Maintain achievements; 2018 and 2019 achieved first quartile performance
Billing Accuracy	99.53%	99.77%	99.93%	99.79%	Staffing, weather, and human error are all factors that will continue to impact this metric; MERC expects to maintain performance with slight improvements in 2019 and beyond, dependent upon other external factors. MERC's planned implementation of AMI in 2019 and 2020 is expected to result in improvements in billing accuracy in the future.	98.93%	N/A	98.85%	N/A	98.47%	N/A	Replacement of outdated customer information system; system billing capabilities (compared to pre-ICE system); system automation capabilities (compared to pre-ICE system); efficiency and effectiveness of our customer service identification and resolution process through improved Care Center tools.	Weather impacts on meter reading (extreme cold weather event); some unavoidable level of human error (in the absence of AMR/AMI)	Staffing, weather, and human error are all factors that will continue to impact this metric; MERC expects to maintain performance, dependent upon other external factors. MERC's planned implementation of AMI is expected to result in improvements in billing accuracy in the future.
Billing Timeliness	99.89%	98.65%	99.50%	99.00%	Staffing, weather, and human error are all factors that will continue to impact this metric; MERC expects to maintain performance with slight improvements in 2019 and beyond, dependent upon other external factors. MERC's planned implementation of AMI in 2019 and 2020 is expected to result in improvements in billing timeliness in the future.	99.48%	N/A	99.37%	N/A	99.13%	N/A	Replacement of outdated customer information system; system billing capabilities (compared to pre-ICE system); system automation capabilities (compared to pre-ICE system)	Narrow windows of the quartiles (at the 99.00 percent level) means that minor changes can greatly impact achievements in this metric. Weather and human error affect billing timeliness in a similar manner as billing accuracy.	Staffing, weather, and human error are all factors that will continue to impact this metric; MERC expects to maintain performance, dependent upon other external factors. MERC's planned implementation of AMI is expected to result in improvements in billing timeliness in the future.
Even Payment Plan Adoption (%)	14.43%	15.12%	16.8%	11.9%	Maintain achievements within second quartile, moving toward first quartile performance of 16.8 percent. While MERC will continue to target continuous even payment plan adoption through customer education, participation is optional and will depend on customer interest.	15.51%	N/A	16.00%	N/A	16.10%	N/A	Proactive solicitation and automated enrollment into the even payment plan makes enrollment easier for customers	Customer education and interest	Maintain achievements within second quartile, moving toward first quartile performance of 16.8 percent. While MERC will continue to target continuous even payment plan adoption through customer education, participation is optional and will depend on customer interest.
e-Bill Adoption (%)	20.27%	22.38%	14.5%	10.3%	Target maintaining first quartile performance. While MERC will continue to target continuous e-bill adoption through customer education, participation is optional and will depend on customer interest. Potential barrier to 2019 and future achievement with a planned web platform project, which could create temporary disruptions.	26.21%	N/A	30.50%	N/A	31.70%	N/A	Makes electronic billing application more user-friendly for customers, increases mobile options, and allows customers to continue electronic billing if they move and transfer service to a new address.	Website platform upgrades completed in 2019 resulted in some temporary and minor disruptions	Target maintaining first quartile performance. While MERC will continue to target continuous e-bill adoption through customer education; participation is optional and will depend on customer interest. ICE was the precursor to enable our ability to evolve and grow our digital platform to deliver on customer expectations. New upgrades and improvements are likely to impact this indicator in the future.
e-Payment Adoption %	55.50%	57.58%	51.6%	45.3%	Target maintaining first quartile performance. While MERC will continue to target continuous e-bill adoption through customer education, participation is optional and will depend on customer interest. Potential barrier to 2019 and future achievement with a planned web platform project, which could create temporary disruptions.	60.42%	N/A	60.90%	N/A	66.00%	N/A	Makes electronic billing application more user-friendly for customers, increases mobile options, and allows customers to continue electronic billing if they move and transfer service to a new address.	Website platform upgrades completed in 2019 resulted in some temporary and minor disruptions	Target maintaining first quartile performance. While MERC will continue to target continuous e-bill adoption through customer education; participation is optional and will depend on customer interest. ICE was the precursor to enable our ability to evolve and grow our digital platform to deliver on customer expectations. New upgrades and improvements are likely to impact this indicator in the future.
Field Service Appointments Kept	N/A	99.89%	99.0%	98.6%	Maintain first quartile performance. MERC's 2018 achievements were 99.99 percent of field service appointments kept.	99.99%	N/A	99.99%	N/A	99.99%	N/A	Improvements with the implementation of ICE, including improved mobile routing capabilities to the dispatch system, increases our ability to timely meet service appointments. Integrated scheduling into the customer information system to streamline customer <u>scheduling</u> .	None	Maintain achievements; 2018 and 2019 achieved first quartile performance
Net Write Off as % of Revenue	0.58%	0.73%	0.35%	0.52%	MERC will continue to target performance within the second quartile driving toward eventual first quartile performance to the extent such performance is achievable in consideration of external factors affecting overall write offs.	0.58%	N/A	0.75%	N/A	0.80%	N/A	Improvements in collections; system enhancements to allow for additional atomization	Factors unrelated to customer information system and collection activities have a more significant impact on net write offs (e.g., weather, gas prices, other impacts on customer bills). Extreme weather conditions in the 1st quarter in 2019, caused higher than normal estimates and high bills; high bills impact net write offs	MERC will continue to target performance within the second quartile driving toward eventual first quartile performance to the extent such performance is achievable in consideration of external factors affecting overall write offs.
IT / Security (# of masked customer data fields; # of tokenized customer data fields)	0 fields	1,386,000 fields	N/A	N/A	No changes anticipated in the near term (increases would only occur with future upgrades or modifications to the system).	1,386,000 fields	N/A	1,386,000 fields	N/A	1,386,000 fields	N/A	Prior to ICE, MERC's customer information system did not have the capability to mask or tokenize customer information fields. With ICE, customer data fields that are secured via masking or tokenization include bank account information, birthdate, drivers' license information, income, social security numbers, credit card information, and other person data.	None	No changes anticipated in the near term (increases would only occur with future upgrades or modifications to the system).

In the Matter of the Annual Service
Quality Report for Minnesota Energy
Resources Corporation for 2019

Docket No. G011/M-20-____

CERTIFICATE OF SERVICE

I, Kristin M. Stastny, hereby certify that on the 1st day of May, 2020, on behalf of Minnesota Energy Resources Corporation (MERC), I electronically filed a true and correct copy of the enclosed Gas Service Quality Report 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 1st day of May, 2020.

/s/ Kristin M. Stastny
Kristin M. Stastny

[illegible]

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Colleen	Sipiorski	Colleen.Sipiorski@wecenergygroup.com	Minnesota Energy Resources Corporation	700 North Adams St Green Bay, WI 54307	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List
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Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List
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