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October 18, 2020

**VIA ELECTRONIC FILING**

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

RE: Annual Service Quality Report for 2019  
Docket No. G022/M-20-459

Dear Mr. Seuffert:

Greater Minnesota Gas, Inc. (“GMG”) filed its Annual Service Quality Report for 2019 on May 15, 2020. The Minnesota Department of Commerce, Division of Energy Resources (“the Department”) filed its Comments on October 9, 2020. This letter serves as GMG’s Reply in lieu of filing Reply Comments.

GMG appreciates the Department’s recommendation that the Commission accept its Annual Service Quality Report for 2019.

In its Comments, the Department discussed the fact that GMG’s monthly Cold Weather Rule Reports from July through October, 2019 were filed late and requested that GMG explain the reason for the late filing. The Department also relayed the explanation that GMG already provided but apparently, based on its request for additional information, was not satisfied with GMG’s explanation. GMG apologizes if its explanation was unclear and appreciates the opportunity to shed additional light on the situation. As GMG explained in its response to the Department’s Information Request, a copy of which is attached to the Department’s Comments, GMG moved its corporate headquarters in late July, 2019 which ultimately resulted in substantial administrative staff turnover in August, September, and October of 2019. That turnover included individuals who contributed to the cold weather report production. Additionally, GMG launched a new billing system during the fall of 2019; and, GMG’s billing system provides the data that goes into the cold weather rule reports. Unfortunately, GMG’s intended new billing system proved to be unsuitable and GMG had to revert back to its former billing system. The entire billing system situation created substantial work to cross-check data and ensure its integrity – first in the switch to the new program; and, when that did not work, in the restoration of the old program. As such, obtaining the data to compile the Cold Weather Rule Reports was significantly delayed. Additionally, since GMG was training new staff regarding both billing and preparing the Cold Weather Rule Reports, GMG could not simply have a staff person prepare the reports and have confidence that they would be correct. Hence, once the integrity of the information coming from the billing system was assured, GMG’s senior staff took the time to

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work with the new staff to create the Cold Weather Rule Reports and to ensure that the data was correct. Had GMG used potentially corrupted data from the billing system transition without verifying it or had GMG allowed an untrained individual to create the reports, the integrity of the reports could have been affected. Fortunately, as GMG previously indicated, the delay did not have any impact on the integrity of the data contained in the reports – and, in fact, provided time to assure its quality.

GMG also acknowledges the Department’s concern regarding damage to GMG’s system. GMG agrees that it should always strive to reduce damage incidents and, to that end, GMG continues to explore different training options and styles for its locators and it emphasizes always using best practices. While GMG understands the Department’s concern with educating contractors and homeowners about calling for locates and digging practices and GMG does its best to do so, GMG maintains that it cannot control the behavior of either contractors or homeowners. As GMG explained in its response to the Department’s Information Request which is attached to the Department’s Comments,

GMG actively promotes “Call Before You Dig” and using one call procedures – on its website, on its print materials, on its vehicles, on its email signatures, in public meetings, etc. Similarly, the “Call Before You Dig” principles are regularly advertised by various Minnesota agencies and local jurisdictions, Gopher State One Call, and other utilities. In all such cases, the promoted philosophy is to call before you dig at any time – even for small things. From a public education perspective, the exception for hand-digging is generally not discussed in order to encourage one call compliance for any type of digging activity. . . . GMG respectfully submits that, no matter how much public education it and other utilities and institutions do to educate the public, accidents will sometimes happen . . . .

GMG will, of course, continue disseminating message about safety and about the one-call system and it remains hopeful that contractors and homeowners will heed the warnings and learn from the information. GMG will continue to strive to educate its customers about safe practices. Unfortunately, damages caused by homeowners and contractors is not unique to GMG but, rather, is an industry-wide problem, as is securing their compliance with one-call requirements.

Please do not hesitate to contact me should there be any questions or concerns.

Sincerely,

GREATER MINNESOTA GAS, INC.

/s/

Kristine A. Anderson  
Corporate Attorney

cc: Service List

# CERTIFICATE OF SERVICE

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

**Greater Minnesota Gas, Inc.'s Letter in Lieu of Reply Comments  
Docket No. G022/M-20-459**

filed this 18<sup>th</sup> day of October, 2020.

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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	Yes	OFF_SL_20-459_M-20-459
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-459_M-20-459
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_20-459_M-20-459
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-459_M-20-459
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-459_M-20-459