

December 22, 2020

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

RE: **Letter of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G022/M-20-459

Dear Mr. Seuffert:

On May 15, 2020, Greater Minnesota Gas, Inc. (Greater Minnesota or the Company), filed its Annual Service Quality Report for Calendar Year 2019 (Report) with the Minnesota Public Utilities Commission (Commission). The Company's Report included data and discussion regarding service quality information pursuant to past Commission Orders.¹

On October 9, 2020, the Minnesota Department of Commerce, Division of Energy Resources (Department) filed comments in which it recommended that the Commission accept Greater Minnesota's Report. In addition to recommending acceptance, the Department noted two areas that were not entirely clear and required additional discussion.

First, the Department observed that Greater Minnesota filed its July through October monthly Cold Weather Rule (CWR) reports on December 17, 2019. In response to discovery, Greater Minnesota explained that these CWR reports were filed late because the Company moved its corporate headquarters, which resulted in staffing turnover, and had issues with its billing system that needed to be addressed. Greater Minnesota explained that it delayed filing its CWR reports to ensure staff was properly trained and the data integrity verified. The Company did not provide specific information supporting this conclusion; as such, the Department concluded that it was still unclear why Greater Minnesota was unable to make these filings on time.

Second, the Department expressed concern regarding two groups of damage incidences (contractors/homeowners and Company mislocates) in 2019. In particular, the Department noted that this was the first annual service quality report where the Company reported damage events related to work that did not require a locating ticket. Greater Minnesota explained in discovery that these damage events were associated with hand-digging and did not require a locating ticket per the Gopher State One Call statute, Minn. Stat. 216B.01, subd. 5. The Company concluded that no level of engagement or public outreach would prevent damage incidents when locating services are not required by law. The Department responded

¹ January 18, 2011 Order in Docket No. G999/M-09-409, March 6, 2012 Order in Docket No. G022/M-11-356, April 12, 2019 Order in Docket No. G022/M-18-314, and January 7, 2020 Order in Docket No. G022/M-19-304.

that it did not believe specific outreach was necessary to address these incidents but, since the Gopher State One Call advertisements do not specifically reference digging as only mechanical, the Company may wish to consider a discussion of excavation, regardless if mechanical or by hand, in future communications with customers.

Greater Minnesota filed its reply comments on October 18, 2020 responding to the Department's analysis and included additional discussion regarding the topics noted above. In terms of the monthly CWR reports, the Company reiterated much of what it previously provided in response to discovery but further elaborated that the staff turnover that occurred included those who contributed to the CWR reports. With staff turnover, and then the issues with its aborted billing system transition, Greater Minnesota stated that a significant amount of work was necessary to validate data and ensure its integrity; as such, the ability to obtain the data needed to compile the CWR reports was significantly delayed. Since the Company needed to train new staff to use the billing system and compile the CWR reports, Greater Minnesota decided that it was prudent to fully guarantee that staff was trained and the data reasonable before filing the monthly CWR reports. Greater Minnesota noted that the delay did not impact the quality of the data included in the monthly CWR reports. The Department appreciates this additional discussion and does not have additional comment on this topic.

Regarding damage incidents, Greater Minnesota acknowledged the Department's concerns and noted that it always strives to reduce damage incidents and explores different training options and styles to limit these incidents. The Company stated that it understands the Department's concerns with educating homeowners and contractors but maintained that it cannot control the behavior of either contractors or homeowners. Greater Minnesota concluded that it will continue to provide information to contractors and homeowners and is hopeful that these parties will heed warnings and learn from this information.

The Department agrees that Greater Minnesota, and any other utility for that matter, is unable to control the behavior of contractors or homeowners. That said, the Company is able to provide these parties with educational materials and information that can influence choices. Although hand digging does not require a locate by Minnesota Statute, it is in the Company interest to minimize damage to its system, so the Department believes there may be a benefit to informing ratepayers and contractors that they can contact Gopher State One Call for digging, regardless of the circumstances.

Based on its review of Greater Minnesota's additional information and discussion, the Department continues to recommend that the Commission accept Greater Minnesota's Annual Service Quality Report for 2019.

The Department is available to answer any questions that the Commission may have in this matter.

Sincerely,

/s/ ADAM J. HEINEN
Public Utilities Rates Analyst

AJH/ja

CERTIFICATE OF SERVICE

I, Marcella Emeott, hereby certify that I have this day served copies of the following document on the attached list of persons by electronic filing, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

MINNESOTA DEPARTMENT OF COMMERCE – LETTER

No. G022/M-20-459

Dated this **22nd** day of **December 2020**.

/s/Marcella Emeott

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