



414 Nicollet Mall
Minneapolis, Minnesota 55401

December 6, 2019

—Via Electronic Filing—

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: COMPLIANCE FILING
2018 ANNUAL SERVICE QUALITY REPORT
DOCKET NO. G002/M-19-305

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits this compliance filing pursuant to the Commission's November 14, 2019 Order, in the docket referenced above. In this compliance filing, we provide the information required by the Order and confirm our compliance with the Order points applicable to the Company.

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

1. A uniform definition of the number of customers suitable for EFV
2. A uniform definition of the number of customers suitable for manual shut-off valves
3. A uniform metric to be reported as a percentage of customers with installations of both

4. Metrics for the number of customers receiving installations upon request prior to a system upgrade that would require the installation of EFVs

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

1. *Definition of number of customers suitable for EFV*

A customer is suitable for an EFV if they fall under the installation requirements of 49 CFR § 192.383, which is having a service operated at least 10 pounds per square inch gauge and serve a customer load not greater than 1,000 standard cubic feet per hour. However, we note that the actual number of customers (or services) with technical feasibility for an EFV installation may vary since an engineering analysis is required, on a case-by-case basis, to determine actual technical feasibility.

2. *Definition of number of customers suitable for manual shut-off valves*

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

3. *Metrics to address percentage of customers with valve installations and number of customers requesting a valve installation*

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

EFV Installation

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

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

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

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

Manual Shut-Off Installation

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

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

We have electronically filed this document, and copies have been served on the parties on the attached service list. Please contact Pamela Gibbs at pamela.k.gibbs@xcelenergy.com or 612-330-2889 or me at 612-330-6935 or gail.a.baranko@xcelenergy.com if you have any questions regarding this Reply.

Sincerely,

/s/

GAIL A. BARANKO
REGULATORY MANAGER

c: Service List

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

⁵ 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.

CERTIFICATE OF SERVICE

I, Lynnette Sweet, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped
with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

DOCKET Nos. G002/M-19-305

Dated this 6th day of December 2019

/s/

Lynnette Sweet

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allate.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_19-305_M-19-305
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_19-305_M-19-305
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-305_M-19-305
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_19-305_M-19-305
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_19-305_M-19-305
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_19-305_M-19-305
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_19-305_M-19-305
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_19-305_M-19-305
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Electronic Service	No	OFF_SL_19-305_M-19-305
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	No	OFF_SL_19-305_M-19-305

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-305_M-19-305
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-305_M-19-305
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-305_M-19-305
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_19-305_M-19-305
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	No	OFF_SL_19-305_M-19-305
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_19-305_M-19-305
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_19-305_M-19-305
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-305_M-19-305
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-305_M-19-305
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-305_M-19-305

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-305_M-19-305
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-305_M-19-305
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-305_M-19-305
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_19-305_M-19-305