

Staff Briefing Paper

Meeting Date July 15, 2021

Agenda Item 5*

Company Great Plains Natural Gas Co.

Docket Nos. **G-004/M-20-452**
In the Matter of Great Plains Natural Gas Company's Service Quality Report for 2019

G-004/M-19-280
In the Matter of Great Plains Natural Gas Company's Service Quality Report for 2018

Issues Should the Commission accept Great Plains Natural Gas Company's Service Quality Report for 2019?

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Relevant Documents

Date

<i>Order (19-280)</i>	November 14, 2019
Compliance Filing (19-280)	December 6, 2019
<i>Order Setting Reporting Requirements (19-280)</i>	January 7, 2020
Great Plains: Service Quality Report for 2019 (20-452)	May 1, 2020
Department: Comments (20-452)	September 16, 2020
Great Plains: Reply Comments (20-452)	September 23, 2020
Department: Comments re: Excess Flow Valves (19-280)	May 10, 2021

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The attached materials are work papers of the Commission Staff. They are intended for use by the Public Utilities Commission and are based upon information already in the record unless noted otherwise.

I. Statement of the Issues

Should the Commission accept Great Plains Natural Gas Company's Service Quality Report for 2019?

II. Background

On May 1, 2020, Great Plains submitted its Natural Gas Service Quality Report for calendar-year 2019 (*Report*).

On September 16, 2020, the Department of Commerce (Department) filed comments recommending acceptance of the *Report*.

On September 23, 2020, Great Plains filed comments in reply to the Department.

III. Introduction

The Commission requires five Minnesota natural gas utilities¹ to file annual service quality reports, and Staff has prepared Briefing Papers to address each of the five 2019 submissions. Those Briefing Papers focus on the content of the reports and their sufficiency, going toward the ultimate question of whether the Commission should accept the reports.

This Briefing Paper focuses on Great Plains' *Report*. That *Report* comprises less than ten pages of discussion supported by approximately 80 pages of numerical tables.

IV. Parties' Comments

A. Great Plains' *Report*

1. Roadmap

The following table provides a roadmap through the *Report* and the Department's comments. For the most part the *Report* focuses on calendar-year 2019. As part of its comments the Department has tabulated figures from, in some cases, as far back as 2010. Staff has not duplicated those tables in this Briefing Paper. In subsequent sections Staff has highlighted several metrics of particular interest to the Commission in recent years. The Department is the sole party to file comments on Great Plain's *Report*.

¹ Xcel Energy (Xcel), CenterPoint Energy (CPE), Minnesota Energy Resources Corporation (MERC), Greater Minnesota Gas, and Great Plains Natural Gas.

Table 1: Location of Discussion in the Great Plains Report and Department Comments		
Quality Metrics	Location of Discussion in Record	
	Great Plains	Department
Call Center Response Time	p. 1 and Schedule 1	p. 2
Meter Reading Performance	p. 1 and Schedule 2	pp. 2-3
Involuntary Service Disconnections	pp. 1-2 and Schedule 3	pp. 3-4
Service Extension Requests	p. 2 and Schedule 4	pp. 4-5
Customer Deposits	p. 2 and Schedule 5	p. 5
Customer Complaints	p. 3 and Schedule 6	pp. 5-7
Gas Emergency Response Time	p. 4 and Schedule 7	pp. 7-9
Mislocates	p. 4 and Schedule 8	p. 9
Damaged Gas Lines	pp. 4-5 and Schedule 9	pp. 10-11
Service Interruptions	p. 5 and Schedule 10	pp. 11-12
MNOPS Reportable Events	pp. 5-6 and Schedule 10	pp. 11-12
Gas Emergency Call Time	p. 5 and Schedule 11	pp. 7-8
Customer-Related O&M Expenses	pp. 5-6 and Schedule 12	pp. 12-13
Distribution System Performance	p. 6 and Schedule 13	pp. 13-16
Excess Flow Valves (EFVs)	p. 6 and Schedule 13	p. 16

2. Minnesota Office of Pipeline Safety (MNOPS) Events

Great Plains stated that three service interruptions were reported to MNOPS in 2019. In all three cases the interruptions were caused by excavation damages to PVC lines. Great Plains was not cited by MNOPS for any emergency response violations and did not receive any violation letters from MNOPS in 2019.²

3. Integrity Management Plans

In its order of January 7, 2020³, the Commission required Great Plains to report several integrity management plan metrics: (1) leak count by facility type and threat, (2) leak count on mains by material, and (3) leak count by service and material. Great Plains reported 78 leaks above ground, 20 leaks on mains and 35 leaks on services in 2019.⁴ On average, Great Plains served approximately 18,800 residential accounts in 2019⁵ and operated 535 miles of pipe.⁶

4. Excess Flow Valves (EFVs)

On November 14, 2019, the Commission ordered Great Plains to file:

² Great Plains Report, p. 5.

³ Docket 19-280.

⁴ Great Plains Report, Schedule 13.

⁵ Great Plains Report, Schedule 3.

⁶ Great Plains Report, Schedules 8 and 9.

- b. the uniform reporting metrics for installation of excess flow valves (EFV) and manual service line shutoff valves, to be developed as follows:
By December 6, 2019, 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 recommendation could include:
 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.⁷

Great Plains submitted its compliance filing on December 6, 2019, and it reported the EFV and shut-off valve (SOV) data sought by the Commission in Schedule 13 of its May 1, 2020 Report.⁸

Great Plains defined the number of customers suitable for EFVs:

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 (SCFH). However, if an appropriately sized EFV is available Great Plains will install an EFV on a service line serving a load greater than 1,000 SCFH. 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.⁹

Great Plains defined the number of customers suitable for SOVs:

A customer is suitable for a manual shut-off valve if they do not meet the requirements of 49 CFR § 192.383.¹⁰

Note that Great Plains consulted Xcel, CPE, and MERC in developing the recommended definitions and reporting format and the four utilities are consistent in their recommendations.¹¹

⁷ Docket 19-280.

⁸ Docket 20-452.

⁹ Compliance Filing, December 6, 2019, Docket 19-280.

¹⁰ Compliance Filing, December 6, 2019, Docket 19-280.

¹¹ See the December 6, 2019, filings in Dockets 19-300 (CPE), 19-303 (MERC) and 19-305 (Xcel).

Great Plains reported that it had 22,261 customers suitable for EFV installation and that it had installed 5,994 by the end of 2019 (an increase of approximately 1,000 EFVs from 2018). Great Plains reported that it had 89 customers suitable for SOV installation and that it had installed 58 by the end of 2019 (up from 19 at the end of 2018). No customers had requested installation of EFVs or SOVs.¹²

B. DOC Comments

DOC recommended that the Commission accept Great Plains' service quality report stating that Great Plains had met all the applicable reporting requirements.¹³

C. Great Plains Reply to DOC

Great Plains agreed with the Department's recommendation.

V. Staff Analysis

Staff believes that Great Plains has met the Commission's reporting requirements and recommends the Commission accept Great Plains' *Report*. Staff also believes that Great Plains has met the Commission's December 6, 2019, request for EFV and SOV reporting. The Commission's Consumer Affairs Office (CAO) received two complaints from Great Plains' customers in 2019, both related to billing.

VI. Commission Options

1. Accept Great Plains' *Report* for 2019.
2. Reject Great Plains' *Report* for 2019.
3. Take other/additional action.

¹² Great Plains *Report*, Schedule 13 (2019) and Great Plains Report for 2018, Schedule 13 (19-280).

¹³ Department Comments, p. 16.