

# **Staff Briefing Paper**

Meeting Date July 15, 2021 Agenda Item 8\*

Company Greater Minnesota Gas, Inc.

Docket Nos. **G-022/M-20-459** 

In the Matter of Greater Minnesota Gas' Natural Gas Service Quality Report for

2019

G-022/M-19-304

In the Matter of Greater Minnesota Gas' Natural Gas Service Quality Report for

2018

Issues Should the Commission accept Greater Minnesota Gas' (GMG's) Natural Gas Service

Quality Report for 2019?

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Y	Relevant Documents	Date
	Order (19-304)	November 14, 2020
	Order Setting Reporting Requirements (19-304)	January 7, 2020
	GMG: Service Quality Report for 2019 (20-459)	May 15, 2020
	Department: Comments (20-459)	October 9, 2020
	GMG: Reply Comments (20-459)	October 19, 2020
	Department: Response (20-459)	December 22, 2020

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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 Greater Minnesota Gas' (GMG's) Natural Gas Service Quality Report for 2019?

#### II. Background

**On May 15, 2020**, GMG submitted its 2019 Natural Gas Service Quality Report for calendar-year 2019 (*Report*).

On October 9, 2020, the Department of Commerce (Department) filed comments.

On October 19, 2020, GMG filed reply comments.

On December 22, 2020, the Department filed reply comments.

#### III. Introduction

The Commission requires five Minnesota natural gas utilities<sup>1</sup> 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 as to whether the Commission should accept the reports.

This Briefing Paper focuses on GMG's *Report*. GMG's *Report* comprises approximately ten pages of discussion supported by approximately 80 pages of numerical tables.

#### IV. Parties' Comments

#### A. GMG's 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 GMG's *Report*.

<sup>&</sup>lt;sup>1</sup> Xcel Energy, CenterPoint Energy, Minnesota Energy Resources Corporation, Greater Minnesota Gas, and Great Plains Natural Gas.

Table 1: Location of Discussion in GMG Report and Department Comments			
Quality Metrics	Location of Discussion in Record		
Quality Wethes	GMG	Department	
Call Center Response Time	p. 2	pp. 2-3	
Meter Reading Performance	p. 3	pp. 3-4	
Involuntary Service Disconnections	p. 3 and Attachment A; Reply,	pp. 4-6, (Reply, pp.	
	p. 1	1-2)	
Service Extension Requests	pp. 3-5 and Attachment B	pp. 6-9	
<b>Customer Deposits</b>	p. 5	pp. 9-10	
<b>Customer Complaints</b>	pp. 6-7	pp. 10-11	
Gas Emergency Calls & Responses	p. 7-8	pp. 11-12	
Mislocates	p. 8	pp. 12-13	
Damaged Gas Lines	p. 9; Reply, p. 2	pp. 13-16; Reply,	
		pp. 1-2	
Service Interruptions	p. 9	pp. 14-16	
Customer-Related O&M Expenses	p. 10	pp. 16-17	
MNOPS Reportable Events	pp. 9-10	p. 16	
Distribution System Performance	pp. 10-11 and Attachment C	pp. 17-18	
Excess Flow Valves (EFVs) and Shut-	Attachment C		
Off Valves (SOVs)			

#### 2. Minnesota Office of Pipeline Safety (MNOPS) Events

GMG had two major events in 2019 reported to the Minnesota Office of Pipeline Safety (MNOPS). One event involved a lightning strike fire that affected service to one customer. No injuries were reported. The other event involved a material failure while new service was being installed. No customers were affected, and no service was disrupted. GMG did not have any emergency response violations.<sup>2</sup>

#### 3. Integrity Management Plan

GMG reported to the U.S Department of Transportation that it had eliminated or repaired a total of 19 leaks on service lines and mains in 2019. At year end, GMG had scheduled 48 leaks for repair.<sup>3</sup> GMG operated approximately 918 miles of pipe and 9,135 services in 2019.<sup>4</sup>

# 4. Excess Flow Valves (EFVs)

GMG reported that it had installed 573 Excess Flow Valves (EFVs) and 4 Shutoff Valves (SOVs) during the year and that by year end it had installed a total of 5,011 EFVs and 30 Shutoff

<sup>&</sup>lt;sup>2</sup> GMG *Report*, pp. 9-11.

<sup>&</sup>lt;sup>3</sup> GMG *Report*, Attachment C, Annual Report to the U.S. Department of Transportation.

<sup>&</sup>lt;sup>4</sup> GMG *Report*, p. 10; Attachment C, Annual Report to the U.S. Department of Transportation.

Valves.<sup>5</sup> Note that GMG was not required by the Commission to develop a uniform EFV/SOV reporting plan as were the other four gas utilities. GMG's figures appear in its report to the U.S. Department of Transportation pursuant to 49 CFR Part 191 and attached to GMG's *Report*.

#### **B.** Department Comments

The Department recommended that the Commission accept GMG's *Report*. However, the Department asked GMG to explain in reply comments why it did not file its July through October monthly Cold Weather Rule (CWR) reports until December. The Department further asked ...

... on a going forward basis, that the Company take steps to decrease damage events on its system. To the extent possible, the Department also requests that Greater Minnesota work with contractors and homeowners to educate them on the importance of knowing gas infrastructure location and the proper way to excavate near marked utility service.<sup>6</sup>

# C. GMG Reply

GMG stated that it had moved its corporate headquarters in late July, that it launched a new billing system later in the fall of 2019, and that the new system was unsatisfactory leading the company to revert to its previous system. Staff turnover and training delayed preparation of the CWR reports and GMG sought to assure the integrity of the reports before reporting the data.<sup>7</sup>

GMG also noted that it will continue to strive to educate customers about safe practices.

### D. Department Reply

The Department continued to recommend the Commission accept GMG's Report.

# V. Staff Analysis

Staff believes that GMG has met the Commission's reporting requirements and recommends the Commission accept GMG's *Report*. The Commission's Consumer Affairs Office (CAO) received no complaints from GMG customers in 2019.

<sup>&</sup>lt;sup>5</sup> GMG *Report*, Attachment C, Annual Report to the U.S. Department of Transportation.

<sup>&</sup>lt;sup>6</sup> Department Comments, p. 18.

<sup>&</sup>lt;sup>7</sup> GMG Reply, pp. 1-2.

# **VI. Commission Options**

- 1. Accept GMG's Report for 2019.
- 2. Reject GMG's Report for 2019.
- 3. Take other/additional action.