

May 24, 2024

Steve Kahl, Executive Secretary  
North Dakota Public Service Commission  
600 East Boulevard, Dept. 408  
Bismarck, ND 58505-0480

Subject: Case Number DM-24-164

Dear Mr. Kahl:

On April 23, 2024, Northern States Power Company (NSP), a Minnesota company and wholly owned subsidiary of Xcel Energy Company, received a copy of the ND One Call Complaint against Xcel Energy from the North Dakota Public Service Commission (NDPSC). The location, identified in the complaint is 8201 Memory Lane, Horace, ND.

Per the description of the alleged violation/concern: The operator failed to mark their underground facility within 24 inches horizontally. An active one-call ticket was in place when a four-inch gas main was hit by a directional boring crew (Optical Xperts) around 9:41 am on 10/24/2022. The ticket (22141215) indicated that the location requested had been "Marked" on 10/20/2022 at 11 :53 am. The operator and the boring crew stated that the gas line had not been marked by the locator (Olameter). The damage of this unmarked facility affected 270 services and created a potentially dangerous work environment for the boring crew.

**Response:**

During the onsite investigation of the 4-inch PE gas main damage that occurred on October 24, 2022, it was determined the four-inch PE gas main was not located at the time of the damage per ticket number 22141215. Xcel Energy provided the investigation results to the Pipeline Safety Program Manager in November 2022. After the 2022 damage, the locate technician was disqualified and provided additional training. After additional audits were conducted on the locate technician involved with this damage, the technician subsequently resigned from Olameter.

The January 25, 2024, NDPSC Pipeline Failure Investigation Report contained the following as Applicable Recommendations: Improve locator training and oversight, improve locator retention, utilize this event as a training tool.

The following are actions taken by Xcel Energy and Olameter since the event in question:

1. **Improve Locator Training and Oversight:** Additional training staff for Olameter was added in May 2023. Olameter increased the total amount of audits conducted on their employees by 50 per week. These are still being performed and are targeted primarily at newer employees, but also conducted on the experienced technicians. If a failed audit is found, the technician is brought back to the site to learn from and explain the failure. If the locating issues continue, or if there appears to be a blatant disregard of policy, the technician will be removed from the field and either retrained or possibly released.

2. **Improve Locator Retention**: Xcel Energy is not aware that Olameter has employee retention issues in the Fargo area.
3. **Utilize this Event as a Training Tool**: Olameter communicated the results of the investigation and shared lessons learned with all North Dakota locate technicians on November 3, 2022. All damages and concerns are investigated promptly; action is taken to correct any issues and prevent recurrence.

Additionally, Xcel Energy holds monthly meetings with Olameter's leadership to review locate performance.

If you need further information or clarification regarding this response, please contact Lisa Kallberg at 651-788-0648. We thank the Commission and Staff for your time and attention to this matter.

Sincerely,

A handwritten signature in black ink that reads "Alicia Berger". The signature is written in a cursive, flowing style.

Alicia Berger  
Regional Vice President, Gas Operations

cc: Alex Nisbet, Christine Schwartz