

July 24, 2013

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Letter of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G008/M-13-352

Dear Dr. Haar:

The Minnesota Department of Commerce, Division of Energy Resources (Department) filed its *Comments* in the above-referenced docket on June 27, 2013. In those *Comments*, the Department recommended that the Minnesota Public Utilities Commission (Commission) accept CenterPoint Energy's (CenterPoint or Company) 2012 *Annual Service Quality Report* pending the Company's reply to the following:

- Whether service quality in call center answer time has diminished in recent years;
- A full description of ongoing and/or planned efforts to improve call center answer times; and
- A full explanation of why the Company experienced increased complaints in the categories of Disconnect Non-Pay and Web/Customer Self Service/IVR in 2012.

CenterPoint filed its *Reply Comments* on July 11, 2013. In its *Reply Comments*, the Company provided additional, clarifying information regarding the issues the Department identified in its *Comments*. The Department appreciates the additional information and concludes that the Company's explanations and clarifications are generally satisfactory.

The Company also filed a supplemental filing with an updated Schedule 3 that contains revised Cold Weather Rule (CWR) reported information on lines 3, 6, 16a, 18, 21c-e, and 22c-e. The information reported in these lines is, in order, number of CWR protection requests, number of accounts granted reconnection request, number of PS (payment schedule) requests received, number of PS negotiations mutually agreed upon, number of customer accounts disconnected who did not seek protection (number of gas heat affected, number of gas heat not affected, and total number disconnected), and number of customer accounts disconnected seeking protection (number of gas heat affected, number of gas heat not affected, and total number disconnected).

The Department has reviewed the updated numbers provided by CenterPoint in its revised CWR table and notes the following:

- The changes to the information in line 3 are less than 3% of the originally reported numbers, with the exception of the information reported for October and December of 2012. The revised numbers for those months are closer to those reported in previous years.
- The revisions to the granted reconnection requests data reported in line 6 indicate a decrease in the number of accounts granted a reconnection request from the original data. As a percent of total CWR requests, the metric falls from a yearly average of 9.6 percent to 8.9 percent. Nevertheless, the revised data reflects a substantial improvement over the 6 percent of requests granted in 2011.
- The revisions to lines 21c-e and 22c-e merely redistribute some of the disconnections reported as “did not seek protection” (lines 21c-e) to “disconnected seeking protection” (lines 22c-e). The total number of disconnected customer accounts reported in line 23 is, as noted by the Company, unchanged.

The Department concludes that the revised information submitted does not raise any further concerns. The Department appreciates CenterPoint’s efforts to provide accurate and up to date information in this docket and recommends that the Commission accept CenterPoint’s 2012 *Annual Service Quality Report*.

The Department does not anticipate filing any additional comments in this docket and is available to answer any questions that the Commission may have.

Sincerely,

/s/ LAURA B. LAUFMANN
Rates Analyst
651-539-1828

LBL/sm

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, 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**

Docket No. G008/M-13-352

Dated this **24th** day of **July, 2013**

/s/Sharon Ferguson

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