

June 15, 2018

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G008/M-18-312

Dear Mr. Wolf:

Attached are the *Comments* of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

2017 Annual Gas Service Quality Report (2017 Report) submitted by CenterPoint Energy Resources Corporation, d/b/a CenterPoint Energy Minnesota Gas (CenterPoint or the Company).

The 2017 Report was filed on May 1, 2018 by:

Shari Grams
Regulatory Analyst
CenterPoint Energy
505 Nicollet Mall, P.O. Box 59038
Minneapolis, Minnesota 55459-0038

Based on its review of CenterPoint's 2017 Report, the Department recommends that the Minnesota Public Utilities Commission (Commission) **accept** the 2017 Report pending CenterPoint's response to various inquiries in reply comments.

The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ SAMIR OUANES
Rates Analyst

SO/ja
Attachment

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. G008/M-18-312

I. BACKGROUND

On April 16, 2009, the Minnesota Public Utilities Commission (Commission) opened an investigation into natural gas service quality standards in Docket No. G999/CI-09-409 (09-409 Docket), and requested comments from the Minnesota Department of Commerce, Division of Energy Resources¹ (Department or DOC) and all Minnesota regulated natural gas utilities. In its August 26, 2010 *Order* (09-409 *Order*) in the 09-409 Docket, and in various subsequent Orders, the Commission established uniform reporting requirements that Minnesota regulated natural gas utilities are to follow and a list of information that should be provided by each utility in a miscellaneous tariff filing to be made each May 1 reflecting service quality performance during the prior calendar year.²

On May 1, 2018, CenterPoint Energy Resources Corp. (CenterPoint or the Company) filed its 2017 *Annual Service Quality Report* (2017 Report).

The Department provides its analysis of the 2017 Report below.

II. DEPARTMENT ANALYSIS

The Department notes that 2017 Report marks the seventh year that CenterPoint has provided all of the required data for a full calendar year.³

The Department analyzes the information provided in the Report in the context of past reports. Overall, the Department identified no major concerns regarding CenterPoint's 2017 Report. The Department provides further detail on each reporting metric below.

¹ At the time the Commission opened this investigation, the Department was referred to as the Minnesota Office of Energy Security, or OES.

² CenterPoint has filed its annual reports in Docket Nos. G008/M-10-378, G008/M-12-425, G008/M-13-352, G008/M-14-316, G008/M-15-414, G008/M-16-377, and G008/M-17-342.

³ As acknowledged in the 09-409 Order, the Company was unable to provide a year's worth of data for certain metrics in CenterPoint's 2010 *Annual Service Quality Report*.

A. CALL CENTER RESPONSE TIME

Minnesota Rules, part 7826.1200 requires Minnesota’s electric utilities to answer 80 percent of calls made to the business office during regular business hours within 20 seconds. The Commission required the regulated gas utilities to provide in their annual service quality reports the call center response time in terms of the percentage of calls answered within 20 seconds. CenterPoint has consistently provided call response data reflecting interactive voice response (IVR)-excluded calls in its past reports; however, the Company has provided complete call center response time data beginning with the 2012 annual report.⁴

As shown in Tables 1 and 2 below, CenterPoint was able to answer 80 percent, or more, of calls within 20 seconds in 2017.

Table 1: Call Center Response Time Excluding IVR

	12-Mo. Avg.	Service Level Monthly High ⁵	Service Level Monthly Low	Average Speed of Answer (seconds)	Total Calls
2010 ⁶	84%	90%	80%	24	916,168
2011	83%	92%	75%	21	896,851
2012	82%	90%	68%	25	738,637
2013	81%	91%	74%	25	854,898
2014 ⁷	67%	83%	39%	47	943,870
2015	82%	93%	63%	23	977,155
2016	82%	88%	76%	25	845,956
2017	80%	84%	72%	23	805,360

⁴ At the request of the workgroup tasked with improving reporting consistency, the Company began including IVR-answered calls in its call center response data.

⁵ Service Level High/Low reflects the highest and lowest percentage of calls answered under 20 seconds for a single month in a given year.

⁶ The Department notes that the percentage of calls answered in 20 seconds or less was not tracked for the first three months of 2010, though average answer time and total number of calls answered were reported and reflect all of 2010.

⁷ CenterPoint provided revised 2014 call center response time data in its 2016 Report; the revised data are reflected in Tables 1 and 2.

Table 2: Call Center Response Time Including IVR

	12-Mo. Avg.	Service Level Monthly High	Service Level Monthly Low	Average Speed of Answer (seconds)	Total Calls
2012	88%	93%	77%	17	1,171,297
2013	88%	95%	83%	16	1,330,798
2014	80%	89%	63%	28	1,606,827
2015	90%	96%	81%	13	1,750,366
2016	90%	94%	87%	13	1,631,160
2017	90%	92%	85%	12	1,601,296

In its November 25, 2015 Order in Docket No. G008/M-15-414 (15-414 *Order*), the Commission required CenterPoint to address in its next annual service quality report any aspect of the new IVR system that may impact the comparability of data based on the old versus the new system, if any. In its annual report filed in Docket No. G008/M-16-377, the Company stated the following:

The implementation of the technological changes described in the Company's 2014 report affected the Percent of Zero Out by Month (Schedule 1a). A higher number of customer calls can be handled in the IVR, resulting in a lower IVR zero out. This is because the new IVR system prompts the customer to determine why they are calling so they can be routed to the appropriate resource.

Also in its 15-414 *Order*, the Commission required CenterPoint to provide IVR system "zero out" data in subsequent service quality reports.⁸ CenterPoint provided the required data showing an overall zero out rate of 0.1% in 2017, down from 0.2% in 2016.

B. METER READING PERFORMANCE

In its 09-409 *Order*, the Commission required CenterPoint to report meter reading performance data in the same manner as prescribed in Minnesota Rule 7826.1400. In its 2017 Report, the Company provided the meter reading performance data per Minnesota Rules.

⁸ As explained by the Company in response to the Department's discovery (Attachment 1), when customers call CenterPoint, their calls are initially routed to the IVR (automated system). The customers who zero out of the IVR are the customers who do not want to use the IVR and want to be transferred to an agent.

As can be seen in Table 3, the average number of meters has steadily increased to 861,929 in 2017, the proportion of those read by the Company has stayed approximately the same at just over 98 percent, and the number of meters unread for more than six months decreased to 85 in 2017 from 133 in 2016.

Table 3: Meter Reading Performance

	Avg. # of Meters	Company Reads	Customer Reads	Avg. # not Read in over 6 mo.	Avg. # not Read in over 12 mo.	Average Meter Staff Level (Metro)	Average Meter Staff Level (Outstate)
2010	807,935	97.83%	0.0004%	223	216	10	20
2011	814,339	97.78%	0.0002%	241	129	10	19
2012	827,468	98.31%	0.0001%	196	75	10	17
2013	826,555	98.21%	0.0001%	141	68	10	17
2014	829,307	98.09%	0.0001%	203	101	8	14
2015	844,010	98.31%	0.0000%	163	112	7	11
2016	852,190	98.39%	0.0001%	133	68	7	11
2017	861,929	98.45%	0.0000%	85	40	6	10

Meter reading performance has improved despite the increase in number of meters and the decrease in staffing levels.

C. INVOLUNTARY SERVICE DISCONNECTIONS

In its 2017 Report, the Company included involuntary disconnection data that it reports under Minn. Stat. §§ 216B.091 and 216B.096 in Docket No. E,G999/PR-17-02. Table 4 below summarizes CenterPoint’s involuntary disconnection data.

Table 4: Involuntary Service Disconnects

	Disconnect Notices Sent	# of CWR Requests	CWR Requests Granted	% CWR Granted	Involuntary Disconnects ⁹	% Restored in 24 hrs.
2010	152,317	75,818	75,818	100.0%	26,773	87.08%
2011	206,533	72,944	72,944	100.0%	23,022	85.43%
2012	239,378	61,062	59,478	97.4%	26,573	78.75%
2013	306,515	60,413	58,414	96.7%	30,347	82.50%
2014	327,527	58,085	57,122	98.3%	21,064	83.11%
2015	274,007	40,088	39,530	98.6%	32,809	83.60%
2016	261,852	61,758	61,128	99.0%	33,327	82.51%
2017	271,919	24,363	23,412	96.1%	30,877	79.99%

As shown on Table 4 above, while disconnection notices sent in 2017 increased compared to 2016 by 4%, involuntary disconnections decreased in 2017 compared to 2016 by 7%.

D. SERVICE EXTENSION REQUESTS

The metrics reported for service-extension requests are the days it takes to extend service 1) to locations not previously served and 2) to locations previously served by the Company.¹⁰ Beginning in 2012, the Company revised its service extension reporting methods so that new and renewed service orders would be reported consistently.

The following tables summarize CenterPoint’s service extension requests and installation intervals.

⁹ Number of customer accounts disconnected for nonpayment.

¹⁰ Locations with locked meters due to credit-related issues are excluded from the data on locations previously served.

Table 5: Residential Customers Requesting Service

	Number of Requests		Average Number of Days to Complete Installation	
	New Customers	Previously Installed	New Customers	Previously Installed
2010	1,006	304	11.14	13.29
2011	3,057	238	17.08	17.58
2012	3,646	354	6.33	6.50
2013	4,432	419	7.83	9.58
2014	4,670	546	7.75	8.75
2015	4,786	591	8.33	9.33
2016	5,276	559	7.92	8.67
2017	5,803	564	8.50	8.58

Table 6: Commercial Customers Requesting Service

	Number of Requests		Average Number of Days to Complete Installation	
	New Customers	Previously Installed	New Customers ¹¹	Previously Installed ¹²
2010	31	3	5.50	4.50
2011	294	42	18.36	13.27
2012	84	16	10.42	5.50
2013	370	32	8.92	6.58
2014	496	50	7.75	8.00
2015	541	69	8.42	8.50
2016	462	63	8.08	8.08
2017	467	51	8.08	7.83

CenterPoint's service extension request performance in 2017 appears adequate.

E. CUSTOMER DEPOSITS

The Commission required each natural gas utility to provide in its annual service quality report data on the number of customers required to make a deposit as a condition of receiving service. Table 7 below summarizes CenterPoint's customer deposit information.

¹¹ Corrected from previous DOC comments.

¹² Corrected from previous DOC comments.

Table 7: Customer Deposits

Year	Deposits Required ¹³		Deposits Held	
	Total	% Change from Previous Year	Total	% Change from Previous Year
2010	950		n/a	
2011	590	-38%	2,531	n/a
2012	397	-33%	2,343	-7%
2013	528	33%	2,185	-7%
2014	533	1%	2,132	-2%
2015	512	-4%	2,192	3%
2016	534	4%	2,106	-4%
2017	435	-19%	2,018	-4%

The Department concludes that CenterPoint complied with the customer deposit reporting requirements.

F. CUSTOMER COMPLAINTS

The Commission's 09-409 *Order* requires Minnesota natural gas utilities to provide customer complaint data in the same manner as prescribed in Minnesota Rule 7826.2000.

The Company's customer complaint data are summarized in Table 8 below.¹⁴

¹³ As explained by the Company in response to the Department's discovery (Attachment 1), the current Company policy is to charge a deposit on commercial accounts for commercial customers who are looking to be reconnected after disconnection for non-payment. Once 12 months of good payment history is established, the deposit is refunded.

¹⁴ CenterPoint provided customer complaint data prior to 2010; however, the data provided did not align with the requirements set forth by the Commission in its 09-409 *Order*.

Table 8: Customer Complaints

	# of Complaints Received	# Forwarded by CAO ¹⁵	% Resolved on Initial Inquiry
2010	10,634	94	31.1%
2011	11,590	81	30.2%
2012	5,000	77	60.3%
2013	6,218	89	66.6%
2014	6,770	88	75.0%
2015	7,113	113	77.3%
2016	6,739	58	79.2%
2017	7,629	91	83.4%

Beginning with its 2013 annual service quality report, CenterPoint began using a new set of complaint categories that were different than previous annual service quality reports. The most prevalent complaint categories remain unchanged but there were some categories that the Company modified. As such, it may be difficult to compare certain complaint categories in an historical context.

CenterPoint categorized each Residential and Commercial complaint it received into one of seven categories. Each category includes specific subcategories. For example, a disputed charge complaint is a subcategory under the Billing Errors category. The top five complaint categories reported for 2017 were, in order: Service Issues, Billing Errors, Disputed Charges, Disconnection Issues and Payment Issue. These complaint categories were similar to 2016 when the top five categories, in order, were: Billing Errors, Service Issues, Disconnection Issues, Payment Issue and Disputed Charges.

In general, the Company reduced its resolution time in 2017; 84% of residential complaints were resolved immediately (80% in 2016) and 11% within ten days (11% in 2016), and 73% of commercial complaints were resolved immediately (73% in 2016) and 17% within ten days (13% in 2016).

G. GAS EMERGENCY CALLS

In its March 6 Order in Docket No. G008/M-10-378, the Commission required CenterPoint to track and report the total number of gas emergency calls received during each annual reporting period. The required metric for emergency call response time is the average percentage of calls answered within 20 seconds.

¹⁵ The Commission's Consumer Affairs Office.

The Company also reported the average speed of answer and the number of emergency line calls answered.

The Company's emergency telephone response data are presented in Table 9 below.

Table 9: Emergency Telephone Response Metrics

	# of Gas Emergency Calls	Average Response Time (seconds)	% of Calls Answered in 20 Seconds or Less
2010	80,627	17	n/a
2011	77,042	21	83.17
2012	67,621	13	90.25
2013	78,629	16	85.67
2014	89,576	21	77.00
2015	75,215	13	86.00
2016	77,111	12	89.33
2017	70,305	10	90.33

The average emergency call response time was reduced to its lowest level since 2010, 10 seconds in 2017, and the Company was able to answer more than 90 percent of its calls in 20 seconds or less.

H. GAS EMERGENCY RESPONSE TIME

The reporting metric for gas emergency response time is the time from the initial notification of an emergency until qualified emergency response personnel arrive at the incident location. Emergency response times are reported by region (Metro and Outstate), and are categorized in terms of calls responded to within one hour or less and calls responded to in more than one hour. CenterPoint also provided the average number of minutes it took to respond to an emergency. The metrics are reported to the Minnesota Office of Pipeline Safety (MNOPS).

Current and historical emergency response data are provided in Table 10 below.

Table 10: Emergency Gas Response Times

	Calls Received	% Calls Responded to in <1 hour ¹⁶	% Calls Responded to in >1 hour ¹⁷
2010	40,570	87.90	12.10
2011	39,655	88.72	11.28
2012	34,481	93.54	6.46
2013	33,522	92.31	7.69
2014	37,339	90.19	9.81
2015	38,843	92.25	7.75
2016	39,167	90.03	9.97
2017	39,338	93.06	6.94

The Company improved its response time in 2017, 93 percent of the calls within one hour (90 percent in 2016) and 32 minutes to respond to an emergency (35 minutes in 2016).

H. MISLOCATES

The mislocate rate refers to the number of times that a gas line is damaged due to being mismarked or unmarked. The required reporting metric is the total number of mislocates. The Company also provided the number of locate tickets and the number of mislocates per 1,000 locate tickets, which is the same information that CenterPoint reports to MNOPS.

Table 11 below summarizes mislocate data from 2010 to 2017.

Table 11: Mislocates

	# of Locates (Tickets)	# of Mislocates	% of Mislocates ¹⁸
2010	235,790	64	0.03%
2011	256,711	95	0.04%
2012	264,733	97	0.04%
2013	282,915	49	0.02%
2014	299,354	81	0.03%
2015	330,306	91	0.03%
2016	342,140	98	0.03%
2017	349,592	127	0.04%

¹⁶ Corrected from previous DOC comments.

¹⁷ Corrected from previous DOC comments.

¹⁸ Correction from previous DOC comments.

The number of mislocates (as well as the percentage of mislocates has been generally increasing since 2013 and jumped from 98 in 2016 to 127 in 2017, above 100 for the first time since 2010. The Company provided the following discussion in the 2017 Report at 8-9 regarding the steps it will be implementing to address this issue:

The Company will continue to focus on safe digging practices and awareness. We continue to work with the locate groups and have initiated additional review of field auditing. Each of our locate groups conduct regular field audits of their technicians.

The audits are conducted to ensure compliance with applicable elements of Minn. Stat. § 216D and ensure American Public Works Association (APWA) marking best practice guidelines are considered. Effective February 2018, we receive monthly audit reports from each locate group.

Additionally, we have made changes in the tracking of locator damages to spot areas of increased concern. We have created a weekly report that lists all at-fault damages by locator. This report is reviewed with our contract groups at our weekly meetings, so that we can address emerging trends.

The weekly locator damage reports, in tandem with the monthly audit reports, enable us to see trends and potential issues in “real time,” which assists us in identifying locators who may need additional training or intervention.

The Department will monitor the effectiveness of CenterPoint’s measures to address this issue in future annual reports.

I. DAMAGED GAS LINES

The gas system damage metric indicates the number of incidents under the control of CenterPoint employees and the Company’s contractors, and the number caused by other sources. Tables 12 and 13 summarizes CenterPoint’s gas line damage information.

Table 12 below provides causes of all gas line damages as reported by the Company.

Table 12: Causes of Gas Line Damages

	Inadequate Hand Digging	No Locate Ticket Requested
2012	30%	21%
2013	26%	19%
2014	28%	18%
2015 ¹⁹	27%	19%
2016 ²⁰	26%	18%
2017	32%	9%

Table 13 below provides current year and historical information regarding gas line damages.

Table 13: Gas Line Damage Incidents

	Damage by CPE	Damage by Others	Total	Miles of Line	Damage/100 Line Miles
2010	89	593	682	24,642	2.77
2011	155	604	759	24,733	3.07
2012	166	670	836	24,819	3.37
2013	124	539	663	24,874	2.67
2014	152	635	787	25,394	3.10
2015	192	730	922	25,427	3.63
2016 ²¹	148	770	918	25,755	3.56
2017	196	739	935	25,911	3.61

The Department notes that the number of incidents under the control of CenterPoint employees and contractors increased by 25 percent between 2016 and 2017. This increase appears to result from the unusually high number of CPE-controlled damage incidents that occurred in June, September, November and December of 2017. The Department requests that the Company provide in reply comments the reasons for this increase in CenterPoint-controlled damage incidents and the steps it can/will take to improve this metric in the future (in addition

¹⁹ CenterPoint's 2015 data was provided by the Company in its December 21, 2017 reply comments at 2 in Docket No. G008/M-17-342.

²⁰ CenterPoint's 2016 data was provided by the Company in its December 21, 2017 reply comments at 2 in Docket No. G008/M-17-342.

²¹ CenterPoint's revised 2016 damage data was included in the Department's January 24, 2018 reply comments at 3 in Docket No. G008/M-17-342.

to working “with the Minnesota Office of Pipeline Safety and Gopher State One Call to help reduce these types of damages”).²²

J. SERVICE INTERRUPTIONS

The reporting metrics for natural gas service interruptions are the number of firm customers that experienced an unplanned service interruption and the average duration of unplanned service disruptions. Unplanned service interruptions are reported in two categories: 1) those due to CenterPoint employees and contractors, and 2) those caused by others.

Table 14: Service Interruptions

	Outages Caused by Utility	Outages Caused by Others	Total Interruptions	Customers Affected	Weighted Average Duration (minutes) ²³
2010	69	465	534	4,706	n/a
2011	174	459	633	5,317	18
2012	119	570	689	1,554	51
2013	224	317	541	1,073	62
2014	100	538	638	1,181	70
2015	135	618	753	1,745	47
2016	115	646	761	1,430	68
2017	124	486	610	1,406	49

In 2017, there were no months with an average outage length in excess of two hours (4 months in 2016) and 4 months with average outage lengths in excess of one hour (5 months in 2016).

K. MNOPS REPORTABLE EVENTS

The 09-409 *Order* required CenterPoint to provide summaries of all major events that are immediately reportable to MNOPS and provide contemporaneous reporting of these events to both the Commission and Department when they occur. Table 15 below provides a summary of MNOPS reportable events over the past eight years.

²² These steps proposed again in the 2017 Report at 9 appear to be insufficient since CenterPoint discussed them as a response to the same issue in its last three service quality dockets, 15-414, 16-377 and 17-342.

²³ Correction from previous DOC comments.

Table 15: MNOPS Reportable Events

	Reportable Interruptions
2010	18
2011	47
2012	63
2013	66
2014	97
2015	80
2016	56
2017	89

The Company provided information regarding the circumstances surrounding each MNOPS reportable event. The Department reviewed the information for each event in 2017 and it appears that the majority of reportable events were not caused by, or related to, CenterPoint.

In response to the Commission hearing on February 8, 2018, the Company provided the following update regarding one particular MNOPS reportable event - the Minnehaha Academy incident:²⁴

On August 2, 2017, a natural gas explosion occurred at the Minnehaha Academy in Minneapolis, Minnesota, resulting in the deaths of two school employees, serious injuries in others and significant property damage to the school. Certain CenterPoint Energy affiliates, including CERC (CenterPoint Energy Resources Corporation), as well as the contractor company working in the school have been named in litigation arising out of this incident. Additionally, CenterPoint Energy is cooperating with the ongoing investigation conducted by the National Transportation Safety Board (NTSB). Further, CenterPoint Energy is contesting approximately \$200,000 in fines imposed by the Minnesota Office of Pipeline Safety. In early 2018, the Minnesota Occupational Safety and Health Administration concluded its investigation without any adverse findings against CenterPoint Energy. CenterPoint Energy's general and excess liability insurance policies provide coverage for third party bodily injury and property damage claims.

²⁴ Source: 2017 Report at 11.

As of the date of this filing, the Company does not have additional information as to when the investigation by the NTSB will be complete.

If not already provided separately to the Commission, the Department requests the Company be fully responsive to the request by providing in reply comments a summary of the Minnesota Occupational Safety and Health Administration findings and recommendations, as well as the MNOPS response to CenterPoint's challenge of the imposed fines.

L. CUSTOMER-SERVICE-RELATED OPERATIONS AND MAINTENANCE (O&M) EXPENSES

The Commission requires each gas utility to provide data regarding customer-service-related operations and maintenance (O&M) expenses related to customer service recorded in the Federal Energy Regulatory Commission Accounts 901 and 903, plus payroll taxes and benefits.

The Company provided monthly and annual costs. Table 16 below summarizes O&M expenses since 2010.

Table 16: O&M Expenses

	O&M Total	O&M Average/Month
2010	\$24,988,500	\$2,082,375
2011	\$25,403,000	\$2,116,917
2012	\$24,900,000	\$2,075,000
2013	\$24,860,508	\$2,071,709
2014	\$27,675,521	\$2,306,293
2015	\$34,111,598	\$2,842,633
2016	\$30,520,581	\$2,543,382
2017	\$30,178,171	\$2,514,848

As shown in Table 16 above, CenterPoint reported total customer service-related O&M expenses of about \$30.2 million in 2017, less than the 2016 amount of about \$30.5 million, but higher than the 8-year average of about \$27.8 million.

M. STEEL SERVICE AND METER RELOCATION EXPENSES

In its *09-1190 Order*, the Commission required CenterPoint to provide information in future annual service quality reports regarding steel service line relocation expenses and relocation of meters operating at greater than 630 cubic feet per hour (CFH). The Department reviewed the data provided by the Company and notes that the average costs associated with steel service line relocation decreased in 2017 relative to 2016, and the costs associated with meter

relocation increased slightly in 2017 relative to 2016. As noted by the Company in previous annual service quality reports, and in this Report, the costs of these relocation projects, and subsequently any variability in costs, are driven by the unique circumstances of each project. Therefore, it is unlikely that a pattern or trend will develop for this reporting requirement.

III. SUMMARY AND CONCLUSIONS

Based on its review of CenterPoint's 2017 *Annual Service Quality Report*, the Department recommends that the Commission **accept the 2017 Report** pending CenterPoint's providing in Reply Comments:

- the reasons for the increase in CenterPoint-controlled damage incidents and the steps the Company can/will take to improve this metric in the future (in addition to working "with the Minnesota Office of Pipeline Safety and Gopher State One Call to help reduce these types of damages"); and
- if not already provided separately to the Commission, a summary of the Minnesota Occupational Safety and Health Administration findings and recommendations related to the Minnehaha Academy incident, as well as the MNOPS response to CenterPoint's challenge of the imposed fines.

/ja

From: Grams, Shari A
To: [Ouanes, Samir \(COMM\)](#)
Cc: [Grams, Shari A](#); [Pyles, Adam G.](#)
Subject: Service Quality Follow Up
Date: Monday, June 11, 2018 1:11:52 PM

Hi Samir,

It was good speaking with you today about your questions regarding our Service Quality report (Docket No. G-008/M-18-312). As requested, here is the written summary of our discussion regarding Schedule 1a (Percent of Zero Out by Month) and Schedule 5 (Customer Deposits).

Schedule 1a (Percent of Zero Out by Month):

Line #1—Customers who went into the IVR:

- This is a total of all Minnesota calls.
- When customers call CenterPoint, their calls are initially routed to the IVR (automated system).

Line #2—Customers who “0” (Zero) out of the IVR:

- This is a count of customers who press “0” who want to be transferred to an agent, and who do not want to use the IVR.
- This customer count is included in Line #3—Customers who came out of the IVR and went on to an agent.

Line #3—Customers who came out of the IVR and went on to an agent:

- This line contains the counts provided in Line #2 above (Customers who “0” out of the IVR).
- This line also contains calls for those who went on to an agent. This may be due to the IVR not being able to assist them, or because the customer wanted to speak to an agent. It may also be due to emergency or gas leak calls; the IVR cannot address those, and those calls will go to an agent. Commercial and industrial calls also must typically go to an agent.

Line #4—Customers handled IN the IVR:

- Customers who received help via the IVR.
- Customers who may have ended their call while in the IVR (hears message, “We are experiencing longer than normal wait times due to ...”—if the customer ends the call after hearing that message).
- This line also includes customers that heard a “closed” message—if they were not calling for an emergency and were calling after normal business hours (our normal business hours are 7:00 a.m. to 7:00 p.m. (U.S. Central time zone)).

Schedule 5 (Customer Deposits):

Line #1--# of Service Connections—this is a count of both residential and commercial service connections.

Attachment 1

Line #2—Deposits required as a condition of service—the current Company policy is that we charge a deposit on commercial accounts for commercial customers who are looking to be reconnected after disconnection for non-payment. Once 12 months of good payment history is established, the deposit is refunded.

As Schedule 5 shows, we charged 435 deposits for service connection. This count of 435 is part of the 2,018 deposits held at the end of Year 2017.

Let me know if these responses address your questions, or if you need anything further. I am happy to assist and can be reached at the number listed below. Thank you and have a good day.

Shari Grams

Regulatory Analyst
CenterPoint Energy
612.321.4905

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
Comments**

Docket No. G008/M-18-312

Dated this 15th day of June 2018

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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