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June 29, 2012

Burl W. Haar
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-12-425

Dear Dr. Haar:

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

2011 *Annual Service Quality Report* submitted by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas (CenterPoint or Company).

The 2011 *Annual Service Quality Report* was filed on May 1, 2012 by:

Pamela Thomas
Regulatory Financial Analyst
CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas
800 LaSalle Avenue
PO Box 59038
Minneapolis, MN 55459-0038

The Department recommends approval of CenterPoint's 2011 *Quarterly Service Quality Report*, pending CenterPoint's provision of additional information in the Company's *Reply Comments*, as detailed in the body of these *Comments*.

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

Sincerely,

/s/ ADAM JOHN HEINEN
Rates Analyst
651-296-6329

AJH/sm
Attachment



BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET NO. G008/M-12-425

I. BACKGROUND

In the 2004 general rate case proceeding for CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas (CenterPoint or Company), the Minnesota Public Utilities Commission (Commission) requested that the Minnesota Department of Commerce, Division of Energy Resources (Department) and any other interested party review and comment on CenterPoint's quarterly service quality reports each year no later than February 28.¹ In its 2008 general rate case, CenterPoint agreed to continue to file quarterly service quality reports.² The Company also agreed to provide quarterly service quality reports in its Conservation Enabling Rider Evaluation Plan.³

On April 16, 2009, the Commission opened an investigation into natural gas service quality standards in Docket No. G999/CI-09-409 (09-409 Docket). In its August 26, 2010 *Order* (09-409 *Order*) in the 09-409 Docket, the Commission established uniform reporting requirements that Minnesota regulated gas utilities are to follow. The 09-409 *Order* prescribed a list of indicators for which data for each calendar year are to be provided by each utility in a miscellaneous tariff filing to be made by the following May 1. This annual service quality reporting requirement supersedes CenterPoint's quarterly service quality reporting.

¹ See Ordering Paragraph No. 4 of the Commission's July 7, 2006 *Order Accepting 2005 Quarterly Reports and Requiring Additional Information in 2006 Quarterly Reports* in Docket No. G008/GR-04-901.

² *In the Matter of an Application by CenterPoint Energy for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G008/GR-08-1075, Administrative Law Judge's Report, Finding 262.

³ See Ordering Paragraph No. 3.d., in the Commission's January 11, 2010, *Order* in Docket No. G008/GR-08-1075.

The Company was further required in the Commission's March 15, 2010 *Order* in Docket No. G008/M-09-1190 (09-1190 *Order*) to provide itemized costs associated with each steel service line relocation and each relocation of meters rated at 630 cubic feet per hour (CFH) or greater.

On April 29, 2011, CenterPoint filed its calendar year 2010 *Annual Service Quality Report*, including the information about steel service-line relocation and relocation of meters. This was the first annual report filed by the Company under the requirements of the 09-409 *Order*.

On May 1, 2012, CenterPoint filed its calendar year 2011 *Annual Service Quality Report* (Report). This is the second annual report filed by CenterPoint. This Report also includes information related to steel service-line relocation and meter relocations, as prescribed by the Commission in the 09-1190 *Order*.

II. THE DEPARTMENT'S ANALYSIS

In its 09-409 *Order*, the Commission requested that each Minnesota regulated utility provide data about various service quality metrics. The Department addresses each of these metrics below. The Department notes that this Report marks the first time that the Company has provided all of the required data for a full calendar year. As anticipated and acknowledged in the 09-409 *Order*, the Company was unable to provide a full year's worth of data for certain metrics in CenterPoint's 2011 Annual Service Quality Report.

A. CALL CENTER RESPONSE TIME

CenterPoint reported the percentage of calls to call centers answered within 20 seconds, as required, and also the average speed of answer. This Report marks the first time where CenterPoint provided data for an entire calendar year. The Company provided these data in an attachment to its Report. On an annual basis, the Company was able to answer 82 percent of its calls in 20 seconds or less, which exceeds its goal of 80 percent of calls in 20 seconds or less. However, there were 5 months, including the entire first quarter of 2011, where CenterPoint was unable to achieve the 80 percent in 20 second Commission-prescribed standard.⁴ This is in contrast to the April through December 2010 timeframe, for which data was available in the last service quality report, where CenterPoint was able to achieve the reporting goal in each month. The difference in response is not great between the two years; however, the Department is somewhat concerned by the Company's inability to reach the 80/20 service level during the whole of the first quarter in 2011. The Department notes that CenterPoint's Report indicated that the number of calls made to the Company's call center in 2011 decreased by 2.15 percent over 2010 call volume.⁵ The Department recommends that CenterPoint fully explain, in its *Reply*

⁴ CenterPoint did not reach its 80 percent goal in January, February, March, July, or September 2011. The average response percentages were 75 percent, 75 percent, 79 percent, 79 percent, and 75 percent, respectively.

⁵ According to CenterPoint, it answered 896,851 calls in 2011 compared to 916,168 calls in 2010.

Comments, why its call center response levels decreased between 2010 and 2011 and also why it did not reach the 80 percent of calls in 20 seconds standard during any month in the first quarter of 2011.

The average call response time for CenterPoint's call centers for all of 2011 was 20 seconds, CenterPoint explains in its Report that it changed from a simple average to a weighted average to report call center response between its previous and current service quality reports. The Department intends to ensure that the calculation method is standardized for all utilities through the ongoing workgroup meetings required by the Commission in its Order dated March 6, 2012 in Docket No. G008/M-10-378, *et. al.*

B. METER-READING PERFORMANCE

CenterPoint reported meter-reading performance data for the second time; therefore, comparisons, at least on a limited scale, are possible. The metrics reported were:

- A. the number and percentage of customer meters read by Company personnel;
- B. the number and percentage of customer meters self-read by customers;
- C. the number and percentage of customer meters that have not been read by Company personnel for periods of six to 12 months and for periods of longer than 12 months, and an explanation as to why they have not been read; and
- D. data on Company monthly meter-reading staffing levels, by work center or geographical area.

CenterPoint reported that of a potential total of 9,772,068 meters⁶ to be read throughout 2011, 9,555,189, or approximately 97.8 percent, of meters were read by Company personnel.⁷ Customers self-read 19 meters, or 0.0002 percent of the total, which is a decrease of 17 meters over 2010. The Department notes that the number of meters read by utility personnel, when added to the number of meters self-read by customers, does not equal the total number of meters. The Department requests that CenterPoint explain, in *Reply Comments*, the status of these remaining meters (*e.g.* were these meters estimated).

The Company reported that 2,889 meters, 0.03 percent, have not been read for periods of six to 12 months. The 2011 figure represents an increase in unread meters of 216 over 2010. CenterPoint also reported that 1,548 meters (0.02 percent) have not been read for periods exceeding 12 months. In terms of meters not read for periods exceeding 12 months, the 2011

⁶ This number represents the sum of meters to be read during calendar year 2010. Thus, most of the meter readings reported are for multiple readings of the same, not distinct, meters.

⁷ The data provided by the Company show an increase in total meter counts between 2010 and 2011 of 76,853. The majority of these additional meters were CenterPoint read; however, the Company did add 6,112 non-utility read meters.

data reflects a decrease of 1,045, or 67.5 percent, over 2010. Given the large amount of meters on CenterPoint's system, these statistics are fairly reasonable; as such, the Department notes that the decrease in unread meters in this category is a positive development and encourages the Company to continue to achieve, or exceed, these results in future service quality reports. In addition, for both categories of unread meters, "ERT not responding" is the leading reason reported for not reading the meters. Reported 2011 meter-reading staffing levels were unchanged at 10 in the Minneapolis Metro Area and decreased from 20 to 17 during the final quarter of 2011 in CenterPoint's Greater Minnesota Area.

With two full years of data, the Department has been able to compare meter reading performance on a basic level. Until additional years of data are available, any meaningful comparison of trends, or reasonable performance levels, will not be measurable. As such, the Department does not provide additional comparative analysis on this metric at this time.

C. INVOLUNTARY DISCONNECTIONS

The Company has included the involuntary disconnection data that it reports under Minn. Stat. § 216B.091 and § 216B.096 in Docket No. E, G999/PR-11-02. These data were reported by month and not by annual totals. The Department notes that the top month for cold-weather protection requests was January 2011, with a total of 17,292 requests. This represents an increase of approximately 1,500 requests over the maximum request month (March) during 2010. March 2011 had the most disconnections lasting 24 hours or more at 1,092 customers, which is approximately 500 customers less than the maximum monthly disconnections in 2010. January 2011 had the most requests for setting up a payment schedule at 17,099, only two of which did not result in a mutually agreed upon schedule.

While reviewing these data, the Department observed that there were a significant number of past due residential accounts during each month in 2011. Specifically, the Department notes that the lowest number of past due accounts happened in October 2011 (83,222 or roughly 11 percent) and the greatest number of past due accounts occurred in January 2011 (163,366 or roughly 22 percent). The Department recommends that CenterPoint fully explain, in its *Reply Comments*, whether the level of past due accounts in 2011 is typical and what initiatives are in place, or planned, to decrease the overall number of past due accounts.

D. SERVICE EXTENSION REQUEST RESPONSE TIMES

The metric reported for service-extension requests are the days it takes to extend service to locations not previously served and locations previously served.⁸ This marks the first year where data are available for the entire calendar year. In its 2010 Service Quality Report, the Company only had Commercial customer data available for November and December, and Residential data available from June 2010 forward.

⁸ Locations with locked meters due to credit-related issues are excluded from the data on locations previously served.

CenterPoint extended service to 3,057 new residential locations in an average span of 17 days, and to 238 previously served residential locations in an average span of 18 days. The Company extended service to 294 new commercial locations in an average span of 23 days, and to 42 previously served commercial locations in an average span of 14 days.

Since this is the first full calendar year that data are available regarding service extensions, the Department cannot make definitive conclusions because it is unaware of underlying trends or historical patterns. That being said, the Department is concerned with the amount of time needed to extend service, especially to existing properties. All else being equal, one would expect renewed services to be completed substantially sooner than new service extensions. In fact, the average number of days for renewed residential service was longer than extending new service to residential customers. The Department recommends that CenterPoint fully explain, in its *Reply Comments*, why its service extension times are greater than 10 days across all categories and also why the length of time for service extensions to renewed residential customers was longer than new residential service extensions during calendar year 2011.

E. CUSTOMER DEPOSITS

The sole reporting metric for customer deposits is the number of customers required to make a deposit as a condition of receiving service. CenterPoint had a total of 590 such customers, or approximately 0.36 percent of service connections, in calendar year 2011. This represents an increase in deposits of 51 over calendar year 2011.⁹ The Department notes that the top months for requesting deposits were October (140 customers) and November (123 customers). The Department further notes that the number of deposit requests in these two months are significantly higher than the next closest month, June 2011, where the Company requested deposits from 56 customers.

F. DETAILED INFORMATION ABOUT CUSTOMER COMPLAINTS

The metrics addressing customer complaints include:

- A. the number of complaints received;
- B. the number and percentage of complaints alleging billing errors, inaccurate metering, wrongful disconnection, high bills, inadequate service, and the number involving service-extension intervals, service-restoration intervals, and any other identifiable subject matter involved in five percent or more of customer complaints;
- C. the number and percentage of complaints resolved upon initial inquiry, within ten days, and longer than ten days;

⁹ It is important to note that the increase in deposits of 51 takes into account the potential error in 2010 customer deposit levels referenced by the Company on Page 4 of its Report.

- D. the number and percentage of all complaints resolved by taking any of the following actions:
 - (1) taking the action the customer requested;
 - (2) taking an action the customer and the utility agree is an acceptable compromise;
 - (3) providing the customer with information that demonstrates that the situation complained of is not reasonably within the control of the utility; or
 - (4) refusing to take the action the customer requested; and
- E. the number of complaints forwarded to the utility by the commission's Consumer Affairs Office for further investigation and action.¹⁰

CenterPoint collected data regarding customer complaints prior to 2010; however, these data did not align with the requirements set forth by the Commission in its 09-409 *Order*. As such, this Report marks that second year where comparable data are available.

The Company reported 6,772 total complaints in 2011. This represented an increase of 937, or approximately 16 percent, over the 5,835 complaints reported in 2010. This is a fairly significant increase in complaints; as such, CenterPoint includes a brief discussion of the reasons for this increase in its Report. The Company notes that 2010 marked the first year of its expanded complaint tracking system. CenterPoint speculated that the increase in complaints between 2010 and 2011 is related to its Customer Service Staff becoming more comfortable with the new complaint systems and its unique characteristics. This conclusion is not unreasonable; therefore, the Department does not have concerns at this time related to the total number of complaints and will continue to monitor this metric going forward.

The Department observes that there was a large spike in the number of complaints during August and September 2011. Specifically, each month had approximately 700 complaints a piece while the average monthly complaint level was 564. The Department recommends that the Company fully explain, in its *Reply Comments*, why complaints spiked during August and September 2011.

The Department notes that in 2011, just like 2010, “disputed charges” was the largest category of customer complaints for both Commercial (12.84 percent of a total of 436 complaints) and Residential (22.27 percent of a total of 6,336 complaints) customers. A majority of both Commercial and Residential customer complaints were resolved immediately in 2011, at 51.38 percent for Commercial customers and 51.63 percent for Residential customers. The Department notes that this was a decrease in the number of complaints resolved immediately compared to 2010 for both classes. The decrease in performance is especially pronounced for the Commercial rate class where nearly 63 percent of complaints were resolved immediately in 2010. The Department recommends that the Company fully explain, in its *Reply Comments*, why the number of complaints resolved immediately decreased between 2010 and 2011.

¹⁰ See Minnesota Rules part 7826.2000.

CenterPoint's Inverted Block Rate Mechanism (IBR) and Decoupling were important issues for ratepayers and the Commission during 2011. There was significant media attention and discussion regarding the Inverted Block Rate Mechanism and this program was eventually suspended by the Commission in October 2011. Although constituting a relatively small portion of total complaints, 2.52 percent for Commercial customers and 6.25 percent for residential customers, the Department notes that complaints regarding these programs were high in the first quarter of 2011, in fact nearly one-third of residential complaints in January 2011 were related to the IBR, but the number of complaints decreased to less than one percent of residential complaints by the fourth quarter of 2011. The Department will continue to monitor these complaints as long as these rates are charged to CenterPoint customers.

Despite not being strictly comparable from year-to-year, the number of complaints forwarded from the Commission to CenterPoint dropped from 250 in 2010 to 72 in 2011. The Department does note that a further 42 complaints were forwarded from the Better Business Bureau and 129 from the Office of the Attorney General. In total, the Company received 252 complaints that were forwarded from these sources, which is comparable to the number of calls forwarded from the Commission in 2010.

G. EMERGENCY TELEPHONE LINE RESPONSE TIME

The required metric for emergency line response time is the percentage of calls answered within 20 seconds. This marks the first full calendar year that CenterPoint has available data. The Company also reported the average speed of answer and the number of emergency line calls answered. Data for these latter two metrics were available for the entire 2010 calendar year, so this is the second year that these data are available.

The average percentage of emergency line calls answered in 20 seconds or less was 81 percent in 2011, which is comparable to the 7 months of data available in 2010 (82 percent). The average answer time was 24 seconds for 2011, which is 7 seconds longer than for 2010, while the total emergency line calls answered for the year was 77,042, which is an increase of 1,365 calls over 2010. CenterPoint explained in the Report that the increase in answer time was the result of using a weighted average to calculate answer time rather than the simple average used in 2010. The Department intends to ensure that the calculation method emergency call response time is standardized for all utilities through the ongoing workgroup meetings required by the Commission in its Order dated March 6, 2012 in Docket No. G008/M-10-378, *et. al.*

H. MISLOCATE RATE

The mislocate rate refers to the number of times that gas line is damaged due to a line being mismarked or unmarked. The required reporting metric is the total of mislocates. The Company also provided the number of locate tickets and the number of mislocates per 1,000 locate tickets, information which it reports to the Minnesota Office of Pipeline Safety (MnOPS).

In calendar year 2011, CenterPoint Energy had a total of 95 mislocates, an increase of 31 over 2010, out of a total of 256,716 locate tickets, which is 20,926 greater than 2010. The rate of mislocates per 1,000 locate tickets was 0.37 for 2011, which is 0.10 mislocates per 1,000 tickets greater than 2010. The Company explained in its Report that mislocates increased due to the nature and significant increase in communication fiber (fiber optic wire) installed during calendar year 2011. In an effort to remedy this development, the Company stated that it is adding stub services to its Geographic Information System (GIS) maps to better assist utility locators in identifying services. The Department notes that increases in construction activity, as illustrated by the increase in new service extension in 2011 over 2010, may have also contributed to the increase in mislocates.

The Department commends CenterPoint for actively identifying potential causes of mislocates and implementing a system to correct the issue. The Department looks forward to reviewing next year's report for indications showing that the Company's solution was successful.

I. GAS SYSTEM DAMAGES

The gas system damages metric indicates the number of incidents under the control of CenterPoint employees and contractors, or other sources. The Company reported 759 incidences of gas system damage for 2011, which is an increase of 77, or approximately 11 percent, over 2010. There were 155 incidences due to the actions of Company employees or its contractors, an increase of 66 or approximately 74 percent over 2010, and 604 incidences arising from all other causes, an increase of 9 or approximately 1.5 percent, over 2010. The 2009 gas system damage total was 768, which is comparable to the figures for 2011. CenterPoint explained that the increased number of street and road construction projects (152 in 2011 versus 93 in 2010) and significant increases in communication fiber installation were the driving factors behind the increase in gas system damage. In fact, the Company stated that 70 percent of below ground damage in 2011 was related to these types of projects. The Department appreciates CenterPoint's explanations regarding this issue and recommends that the Company continue to work to minimize utility-related damage incidences going forward.

J. NATURAL GAS SERVICE INTERRUPTIONS

The reporting metrics for natural gas service interruptions are the number of firm customers that experience an unplanned service interruption and the average duration of the unplanned service disruptions. Unplanned service interruptions are those due to CenterPoint Energy employees and contractors, or other unplanned causes. This Report marks the first year that the Company had data available for the entire calendar year.

The total number of customers affected by natural gas service interruptions in 2011 was 5,317 resulting from 633 outages. CenterPoint reported that the average duration of these outages was 62 minutes. When broken down by type of interruption, incidences related to utility employees or contractors accounted for 174, or approximately 28 percent, of the total outages and 3,889, or approximately 73 percent, of affected customers. In terms of all other causes, 1,428 customers

were affected by 459 interruptions in 2011. In terms of outage duration, the outages caused by CenterPoint employees or contractors averaged 51 minutes in duration while those associated with other causes lasted an average of 66 minutes.

When looking at the annual totals, it is somewhat concerning that outages related to the Company account for significantly more impacted customers than those associated with other causes. However, when looking at the numbers more closely, 3,670, or approximately 94 percent, of the utility caused interruptions occurred in the month of November. This significant spike suggests that a large, single event outage occurred in this month; however, the Company does not identify the cause of this outage in its Report. The Department recommends that the Company fully explain, in its *Reply Comments*, what caused the large number of interruptions in November and what circumstances led to the large number of impacted customers.

In addition, the Department observed average outage lengths well in excess of two hours during the months of January and February. These are of particular concern since long outages in the winter can cause harm to life and property. The Company does not provide an explanation of the events surrounding these long outages; therefore, the Department recommends that the Company fully explain, in its *Reply Comments*, the circumstances surrounding these long duration outages in January 2011 and February 2011.

K. MnOPS SUMMARIES

The Company is required summarize the reports for major events that it is required to provide to the MnOPS. CenterPoint had 47 MnOPS-reportable events and 2 integrity outages in 2011, compared to 18 reportable events and 3 integrity outages in 2010. The Department is concerned that the number of MnOPS reportable events increased between 2010 and 2011, but it is important to remember that many of these events may be outside of the Company's control. Given this, the Department does not have an issue with the number of events at this time, but does recommend that CenterPoint continue to minimize such events whenever possible.

L. EMERGENCY GAS RESPONSE TIMES

The reporting metric is the time from the initial notification of an emergency until a qualified emergency response person arrives at the incident location. Emergency response times are reported by metro and outstate regions, 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 MnOPS as Company aggregates. This is the third calendar year for which this information is available.

The percentage of emergency gas calls responded to in one hour or less was 88.72 percent, which is an improvement of less than one percent over the 87.90 percent reported in 2010. Despite the slight improvement in performance, the 2011 results are still below the 90.02 percent level of efficiency reported in 2009. Given the relatively small improvement in performance, the

Company did not believe particular initiatives were responsible and that the performances between 2010 and 2011 are statistically similar. CenterPoint did state that it is continuing to improve training of its dispatch group so that future performance will improve.

In terms of call volume, the Company reported 39,655 calls received in 2011 compared to 40,570 calls received in 2010. This is a small decrease, approximately 2 percent, and may have contributed to the small improvement in emergency response time between the two years. The Department did not observe any other concerns regarding this reporting metric and recommends that the Company continue its training programs such that dispatch times continue to improve going forward.

M. CUSTOMER-SERVICE RELATED EXPENSES

The reporting metric is the total of customer-service related operations and maintenance expenses. The report included only expenses for Minnesota-regulated operations of the Company. CenterPoint reported that service-related expenses rose from \$25.0 million in 2010 to \$25.4 million in 2011. The Company did not provide an explanation regarding the increase in cost; however, given the relatively small increase, the Department does not have any concerns regarding these expenses at this time.

N. RELOCATION EXPENSES—STEEL-SERVICE LINE AND METERS AT 630 CFH OR GREATER

The relocation expense reporting metrics are the itemized costs associated with the relocation of each steel-service line and each meter rated at 630 cubic feet per hour (CFH) or greater. The Company provided this information in compliance the Commission's Order dated March 15, 2010 in Docket No. G008/M-09-1190. In 2011, there were 9 steel-service line relocations resulting in a total cost of \$235,418.76. This represents a significant increase of 7 jobs and \$233,021.12 over the equivalent figures for 2010. The Company does not provide an explanation for the increased steel-service line relocation activity and associated costs. The Department recommends that CenterPoint provide a full discussion, in its *Reply Comments*, for the significant increase in steel-service line relocation activity and associated costs in 2011 as compared to 2010.

In terms of meter relocations, the total costs reported in 2011 were \$263,948.26, which is an increase of \$156,378.54 over relocation costs in 2010. The Department notes that the Company does not provide an explanation detailing why these costs were higher. This is especially troubling considering that CenterPoint reported only 21 meter relocations in 2011 compared to 61 in 2010. Further, some of the cost data provided for the meter relocations appear similar, or identical, to certain steel-service line cost data. The Department requests that the Company provide a full explanation, in its *Reply Comments*, detailing why meter relocation costs were higher in 2011 than 2010 and also why certain cost meter relocation data are the same as those data provided in the steel-service line cost summary.

O. ADDITIONAL CUSTOMER SERVICE REPORTING

CenterPoint is required to report Call Center Detail and Customer Formal Complaints. For Call Center Detail, the metrics are the total number of utility calls received and the number of utility calls received through the Company's dedicated call center lines. CenterPoint reports that the overall call volume increased from 1,156,740 calls in 2010 to 1,247,124 in 2010.

The reporting metrics for Customer Formal Complaints are the total number of resolved and unresolved complaints that were forwarded to CenterPoint by state agencies and the Better Business Bureau, categorized by class of service and type of complaint. Also reported are the total number of customers in each class of service and the total number of customers who initiated service during a year. CenterPoint stated that it includes the required information for all complaints received from state agencies and the Better Business Bureau as an aggregate in its annual report to the Commission. The Department reviewed these data and did not observe any issues.

III. THE DEPARTMENT'S RECOMMENDATIONS

Based on the information in the record, the Department expects to recommend approval of CenterPoint Energy's 2011 *Quarterly Service Quality Report*. However, to ensure that the record is complete, the Department recommends that CenterPoint provide the following information in the Company's *Reply Comments*:

- A full explanation of why its call center response levels decreased between 2010 and 2011 and also why it did not reach the 80 percent of calls in 20 seconds standard during any month in the first quarter of 2011;
- A full explanation of why it changed its call response time methodology between reports and what, if any, benefits its ratepayers receive from this change;
- A full explanation of the status of those meters not read by utility personnel or self-read by a customer;
- A full explanation of whether the level of past due accounts in 2011 are typical and what initiatives are in place, or planned, to decrease the overall number of past due accounts;
- A full explanation of why its service extension times are greater than 10 days across all categories and also why the length of time for service extensions to renewed residential customers was longer than new residential service extensions during calendar year 2011;
- A full explanation of why customer complaints spiked during August and September 2011;
- A full explanation of why the number of customer complaints resolved immediately decreased between 2010 and 2011;
- A full explanation of what caused the large number of interruptions in November and what circumstances led to the large number of impacted customers;

- A full explanation of the circumstances surrounding the long duration outages in January 2011 and February 2011;
- A full discussion of why steel-service line costs were significantly higher in 2011 as compared to 2010; and
- A full discussion regarding why meter relocation costs were higher in 2011 than 2010 and also why certain meter relocation cost data are the same as those data provided in the steel-service line cost summary.

/sm

CERTIFICATE OF SERVICE

I, Jan Mottaz, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, 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.

Comments of the Minnesota Department of Commerce, Division of Energy Resources

Docket Nos G008/M-12-425

Dated this **29th day of June 2012**

/s/Jan Mottaz

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Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	Ste 122 9100 W Bloomington Frwy Bloomington, MN 55431	Paper Service	No	OFF_SL_12-425_12-425
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James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Paper Service	No	OFF_SL_12-425_12-425
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