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Via E-filing

May 11, 2015

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

RE: **Reply Comments** Docket G008/AI-15-50
Affiliated Interest Agreement between CenterPoint Energy Minnesota Gas and
CenterPoint Energy Service Company

Dear Mr. Wolf:

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas (“CenterPoint Energy” or “the Company”) filed its Petition for approval of the inclusion of additional customer related services in the Master Services Agreement (MSA) between the Company and CenterPoint Energy Service Company on January 14, 2015 and filed the revised MSA on April 2, 2015. On April 16, 2015 the Department of Commerce (“Department”) filed comments (“Comments”) which recommended approval of the petition with additional reporting requirements. Specifically, the Department recommended that the Company file direct testimony in the next general rate case “demonstrating the monthly savings in dollar amounts to CenterPoint Energy related to the corporate allocations in the proposed MSA from the time of its implementation on December 15, 2014” (page 9 of Department April 16, 2015 Comments). The Company provides the following information in reply to the initial comments.

As the Department noted on page 5 of its Comments, the original petition stated that a unified call center and related support functions in Service Co will allow for synergies over time. These synergies include: reduction of seasonal and peak impacts, disaster/weather risk mitigation, and a larger pool of CSRs to respond to priority calls.

At this time, we are still implementing the unified call center and the potential synergies are expected to be realized in the future after full implementation has occurred. Additionally and as discussed in our 2014 Service Quality Report¹, the Company implemented a number of technological changes in 2014 that are designed to improve interactions with customers and to address the changing ways in which customer

¹ Docket No. G008/M-15-414

conduct business with the Company. The technological changes are integrated and some of the technological changes were necessary to implement the unified call center. As such, it may be difficult to parse out and/or quantify the benefits of specific components and specific benefits may not be immediately recognized. However, in our 2015 rate case the Company commits to provide additional discussion on the status of the implementations of the technological changes and the unified call center along with information about any potential synergies that may be achieved in the future.

Please contact me at 612.321.4625 with any questions.

Sincerely,

/s/

Peggy Sorum
Manager, Regulatory Financial Activities

Enclosures
Cc: Service List

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