

June 27, 2013

Burl W. Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> 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-13-352

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

2012 *Annual Service Quality Report* (Report) submitted by CenterPoint Energy Resources Corp, d/b/a CenterPoint Energy Minnesota Gas (CenterPoint or Company).

The 2012 *Annual Service Quality Report* was filed on May 1, 2013 by:

Aaron Crowell  
Regulatory Analyst  
CenterPoint Energy Resources Corp.  
800 LaSalle Avenue  
Minneapolis, Minnesota 55402-2006

Based on its review of CenterPoint's 2012 *Annual Service Quality Report*, the Department recommends that the Commission **accept** the Company's Report pending CenterPoint's response to various inquiries in *Reply Comments*. The Department's recommendations are listed at the conclusion of its *Comments*.

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

Sincerely,

/s/ LAURA BETH LAUFMANN  
Rates Analyst  
651-296-8663

LBL/ja  
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE  
MINNESOTA DEPARTMENT OF COMMERCE  
DIVISION OF ENERGY RESOURCES

DOCKET NO. G008/M-13-352

**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.<sup>1</sup> In its 2008 general rate case, CenterPoint agreed to continue to file quarterly service quality reports.<sup>2</sup> The Company also agreed to provide quarterly service quality reports in its Conservation Enabling Rider Evaluation Plan.<sup>3</sup>

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 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. This annual service quality reporting requirement superseded CenterPoint's quarterly service quality reporting.

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<sup>1</sup> 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.

<sup>2</sup> *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.

<sup>3</sup> 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* in Docket No. G008/M-10-378, 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*.

In its March 6, 2012 *Order— Accepting Reports and Setting Reporting Requirements* (March 6 *Order*) in Docket No. G008/M-10-378 et. al., the Commission supplemented the reporting requirements set out in its 09-409 *Order*. In addition, the Commission directed the Minnesota natural gas utilities subject to the 09-409 *Order* to convene a workgroup to address improving consistency in reporting and to address certain other reporting issues. The workgroup<sup>4</sup> met on June 22, 2012 and developed more uniform reporting.<sup>5</sup> Reporting changes as a result of the workgroup consensus are noted in the analysis below.

On May 1, 2012, CenterPoint filed its calendar year 2011 *Annual Service Quality Report* in Docket No. G008/M-12-425. This was the second annual report filed by CenterPoint. This report also included information related to steel service-line relocation and meter relocations, as prescribed by the Commission in the 09-1190 *Order*.

On May 1, 2013, CenterPoint filed its calendar year 2012 *Annual Service Quality Report* (Report). This is the third 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*. The Department provides its analysis below.

## II. THE DEPARTMENT'S ANALYSIS

The Department notes that this Report marks the second time that CenterPoint 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*.

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<sup>4</sup> Participating in the workgroup were Xcel Energy, CenterPoint Energy, Minnesota Energy Resources Corporation, Great Plains Natural Gas Company, Interstate Power and Light, and the Department.

<sup>5</sup> See Attachments 1 and 2 for a matrix summarizing each utility's reporting content for each metric and a workgroup agenda.

**A. CALL CENTER RESPONSE TIME**

CenterPoint reported the percentage of calls<sup>6</sup> to call centers answered within 20 seconds, as required, and also the average speed of answer. This Report marks the second 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 81.58 percent of its calls in 20 seconds or less, which exceeds its goal of 80 percent of calls in 20 seconds or less. On a monthly basis, the Company was able to answer 80 percent or more of calls in 20 seconds or less in all but four months<sup>7</sup> of 2012. The Department notes an apparent decline in CenterPoint’s ability to answer calls quickly, as illustrated in the table below.

	<b>12-Month Avg (s/b &gt; 80%)</b>	<b>Monthly High</b>	<b>Monthly Low<sup>8</sup></b>	<b>Avg Speed of Answer (seconds)</b>	<b>Total Calls</b>
<b>2010<sup>9</sup></b>	84.44%	90.00%	80.00%	24.08	916168
<b>2011</b>	82.67%	92.00%	75.00%	21.42	896851
<b>2012</b>	81.58%	90.00%	68.00%	24.92	738637

In the three years for which data is available, CenterPoint has reported decreasing average percentages of calls answered in 20 seconds or less, and decreasing monthly lows for percentage of calls answered in 20 seconds or less. Average speed of answer experienced a 3.5 second increase from 2011 to 2012. While this may be explained by an increase in incoming calls, CenterPoint has reported decreasing numbers of incoming calls to their call center from 2010 through 2012.

The Department would like to note that the Company’s performance in this requirement increases drastically when calls answered using the Company’s IVR system are included. Average speed of answer decreases to 17 seconds, percent of calls answered in 20 seconds or less increases to 88 percent, and the monthly low percentage of calls answered in 20 seconds or less increases to 77 percent, and only one month falls below the 80 percent goal.

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<sup>6</sup> Excluding calls answered with an IVR (interactive voice response) system. At the request of the workgroup tasked with improving reporting consistency, the Company provided Call Center response data both including and excluding IVR answered calls. The Department has analyzed the data excluding IVR calls as this is the data that can be compared with the 2010 and 2011 data; however, analysis of the data including IVR calls will be done for future reports.

<sup>7</sup> Those four months were July (79%), September (73%), October (68%), and November (77%).

<sup>8</sup> Monthly High/Low report the highest/lowest percentage of calls answered in under 20 seconds for a single month in a given year.

<sup>9</sup> 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.

As the 2012 Report is only the third *Annual Service Quality Report* that the Company has filed (and the second that fully reports on all Commission-ordered requirements), the Department cannot perform definitive analysis or determine with certainty the presence of patterns or trends in service quality performance. The Department requests that the Company provide, in *Reply Comments*, its opinion on whether service quality in call center answer times has diminished or is diminishing. The Department also requests that the Company provide, in *Reply Comments*, a description of its ongoing and/or planned efforts to improve call center answer times, if any.

**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 Report, the Company provided the meter reading performance data per Minnesota Rules. Because the 2012 Report is only the third in which meter reading performance data has been provided, definitive conclusions cannot be drawn based on an analysis of the data.

CenterPoint reported that of a potential total of 9,929,616 meters<sup>10</sup> to be read throughout 2012, 9,761,719, or approximately 98.31 percent, meters were read by Company personnel.<sup>11</sup> This percentage is close to the 97.78 percent reported as company read in 2011. Customers self-read 13 meters, or 0.0001 percent of the total, which is a decrease of 6 meters over 2011 and a decrease of 23 meters since 2010.

The Company noted that the number of meters read by utility personnel, when added to the number of meters self-read by customers, is different from the total number of meters. CenterPoint explained that the difference reflects not just estimated bills, but also rebillings and billing adjustments. Through its participation in the workgroup, CenterPoint agreed to exclude special or rebill meter readings from its reported meter reading data.

The Company reported that 2,351 meters, 0.02 percent, have not been read for periods of six to 12 months. The 2012 figure represents a decrease in unread meters of 537 from 2011 and a total decrease of 322 from 2010. CenterPoint also reported that 901 meters (0.01 percent) have not been read for periods exceeding 12 months. In terms of meters not read for periods exceeding 12 months this represents a decrease of 647, or 41.8 percent, from 2011, exceeding the 2011 decrease of 1,045, or 40.3 percent, over 2010. For both categories of unread meters, “ERT<sup>12</sup> not responding” is the leading reason reported for not reading the meters.

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<sup>10</sup> This number represents the sum of meters to be read during calendar year 2012. Thus, most of the meter readings reported are for multiple (approximately 12) readings of the same, not distinct, meters.

<sup>11</sup> The data provided by the Company show an increase in total meter counts between 2010 and 2011 of 76,853 and an increase of 18,994 from 2011 to 2012.

<sup>12</sup> ERT is the module that allows CenterPoint to read a customer’s meter remotely.

The Department recognizes the significant improvement in this metric that the Company has achieved since 2010; total numbers of meters unread in 12 or more months have decreased by 65.3 percent since 2010. The Department notes that reported 2011 meter-reading staffing levels were unchanged at 10 in the Minneapolis Metro Area and 17 in the Greater Minnesota Area. The Department encourages the Company to continue to make efforts towards reducing the number of unread meters.

### C. *INVOLUNTARY SERVICE DISCONNECTIONS*

In its Report, the Company included the involuntary disconnection data that it reports under Minn. Stat. § 216B.091 and § 216B.096 in Docket No. E, G999/PR-11-02. The Company reported 26,573 involuntary disconnects in 2012, an increase of 3,551, or 15.4 percent, from the 23,022 involuntary disconnects reported in 2011. CenterPoint reported 26,773 involuntary disconnects in 2010, approximately the same amount reported in 2012.

The Department reviewed CenterPoint's involuntary disconnection data and did not observe any significant events or anomalies related to involuntary service disconnections. The Department did, however, observe that disconnection levels were higher in the spring and summer of calendar year 2012. As this is the approximate time of year that the Cold Weather Rule ends (April 15), this is to be expected.

In its *Comments* filed in the 2011 Report Docket, the Department noted that past due accounts reached levels of 11-22 percent of total accounts for each month in 2011 and requested that the Company provide additional information in *Reply Comments*. In its July 10, 2012 *Reply Comments*, the Company responded by stating that the levels of past due accounts in 2011 were lower than in previous years and described initiatives used to decrease the number of past due accounts. The Company reported decreased levels of past due accounts in 2012, which would indicate that, according to the Company's *Reply Comments* in last years' docket, past due accounts in 2012 were lower than levels seen in the past, on average. Levels of past due accounts have decreased for each year that the Company has reported them in its *Annual Service Quality Report*.

### D. *SERVICE EXTENSION REQUESTS*

The metrics reported for service-extension requests are the days it takes to extend service to locations not previously served and to locations previously served.<sup>13</sup> This marks the second 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. The Company, in response to the

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<sup>13</sup> Locations with locked meters due to credit-related issues are excluded from the data on locations previously served.

Department's June 29 *Comments* in its 2011 *Annual Service Quality Report*, stated the following in its July 10, 2012 *Reply Comments* regarding its renewed service extension times in 2011:

...data on renewed service orders was not reported in the same way as new service orders. For new services, 'site ready' status was not always changed when the work was dispatched so the time to complete the work may have been overstated; as such the data is not comparable to new orders...

In its 2012 Report, CenterPoint stated that it has revised its service extension reporting methods so that new and renewed service orders would be reported consistently. The Department appreciates CenterPoint's efforts to ensure consistency across service extension categories and notes that the underlying issue (reporting time from the request date as opposed to the site-ready date) has been mentioned by several other Minnesota gas utilities in their service quality reports. An implication of this change is that 2012 data on service extension requests is not comparable to 2011 data.

In 2012, CenterPoint extended service to 3,646 new residential locations in an average span of 6.3 days, and to 354 previously served residential locations in an average span of 6.5 days. The Company extended service to 84 new commercial locations in an average span of 8 days, and to 16 previously served commercial locations in an average span of 5 days. In 2011, CenterPoint reported average service extension times of 17 days for new residential locations, 18 days for existing residential locations, 24 days for new commercial locations, and 14 days for existing commercial locations.

As the Company revised its reporting methods for average days to complete new service extension requests for the 2012 Report, the Department cannot make comparisons between years for that metric. The Department will continue to monitor this metric and will provide comments and analysis when it is appropriate to do so.

#### *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 required a total of 420 such customers as a condition of service in calendar year 2012. This represents a decrease in deposits of 170 from 2011 and a decrease in deposits of 221 since calendar year 2010.<sup>14</sup> The Department notes that the top months for requesting deposits were October (98 customers) and November (68 customers). The Department further notes that the number of deposit requests in these two months are significantly higher than the next closest month, April 2012, where the Company

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<sup>14</sup> Note that the increase in deposits from 2010 to 2011 of 51 takes into account the potential error in 2010 customer deposit levels referenced by the Company on Page 4 of its 2011 Report.

requested deposits from 36 customers. October and November were the two months that saw the most customer deposits in 2011 as well.

The Department will continue to monitor this metric in future service quality reports.

*F. CUSTOMER COMPLAINTS*

The Commission's 09-409 *Order* requires Minnesota gas utilities to provide customer complaint data in the same manner as prescribed in Minnesota Rule 7826.2000. The Company provided, as an attachment to its Report, these customer complaint data per Minnesota Rules. 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 third year where comparable data are available.

CenterPoint received a total of 5,000 customer complaints in 2012, a decrease of 1,772 from the number of complaints received in 2011 and a decrease of 835 from the number of complaints received in 2010. The monthly distribution of complaints received in 2012 was fairly even. The number of complaints received each month was between 400 and 500 except for the months of November and December, when CenterPoint received 332 and 328 complaints, respectively.

In terms of resolution time frames, CenterPoint reported a decrease in the amount of time it took to resolve customer complaints in 2012. In 2012, over 60 percent of complaints were resolved immediately and over 95 percent were resolved within 10 days. In 2011, only 51.6 percent of customer complaints were resolved immediately with 93 percent resolved within 10 days.

CenterPoint categorized each complaint it received into one of 22 categories. The top five complaint categories reported for 2012 were, in order, Disputed Charges, Payment Issue, Disconnect Non-Pay, Inadequate Service, and Credit Arrangements.<sup>15</sup> Most of these categories were also top five complaint categories in 2011 (in order, Disputed Charges, Payment Issue, Credit Arrangements, Inadequate Service, and Billing Errors). As the total number of customer complaints decreased in 2012, the only customer complaint categories that experienced sizable increases in complaints from 2011 to 2012 were Disconnect Non-Pay and Web/Customer Self Service/IVR. The Department requests that CenterPoint, in *Reply Comments*, provide a discussion of the potential causes for the increased complaints in those two categories in 2012.

In its *Comments* filed in the docket concerning CenterPoint's 2011 *Annual Service Quality Report*, the Department noted its concern with the increase in complaints regarding Decoupling and Inverted Block rates. The Department also noted the fact that this issue was discussed frequently in the media during rate case proceedings taking place in 2011. The Department has noted that, in this year's Report, complaints in this category have fallen to a level below those

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<sup>15</sup> Excluding the Other category.



reported in 2010; the Company received only 4 Decoupling/Inverted Block Rate Complaints in 2012.

CenterPoint also provided the number of complaints that it was forwarded from the Commission's Consumer Affairs Office (CAO). In 2012 CenterPoint was forwarded 77 complaints from the CAO, a decrease from the 81 forwarded in 2011 and the 94 forwarded in 2010. In all three years for which this data is available the CAO has been the source of between 1 and 2 percent of all complaints received by the Company.

The Department will continue to monitor all customer complaint reporting requirements filed in CenterPoint's annual service quality reports.

*G. TELEPHONE ANSWER TIMES – GAS EMERGENCY CALLS*

In its March 6 *Order*, 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 line response time is the average percentage of calls answered within 20 seconds. This marks the second 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 third year that these data are available.

CenterPoint was able to answer 90.25 percent of its emergency line calls within 20 seconds in 2012, an improvement over the 83.17 percent achievement reported for 2011. On a monthly basis, CenterPoint did not report a single month in 2012 in which it answered fewer than 80 percent of emergency calls within 20 seconds. The Department notes that CenterPoint was able to answer 90 percent (or more) of emergency line calls in under 20 seconds for 7 months in 2012. The Department applauds CenterPoint's improvement in this metric over its 2011 report and its achievement of exceeding the standard of answering 80 percent of calls in 20 seconds or less.

CenterPoint received a total of 69,207 emergency calls in 2012, which makes 2012 the second year in a row in which the Company saw a decrease in emergency calls; CenterPoint received 77,042 emergency calls in 2011 and 80,627 in 2010.

CenterPoint also saw a decrease in average call answer times in 2012, when the average answer time was 13 seconds, a decrease from the 21-second average reported in 2011 and the 16-second average achieved in 2010. The Department applauds CenterPoint on its improved performance in this metric.

#### *H. MISLOCATES*

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 number 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 2012, CenterPoint Energy had a total of 97 mislocates, an increase of 2 over 2011 and an increase of 33 over 2010, out of a total of 264,833 locate tickets, which is 8,106 greater than 2011 and 29,043 greater than 2010. The rate of mislocates per 1,000 locate tickets was 0.366 for 2012, which is 0.04 mislocates per 1,000 tickets less than 2011 and 0.06 more than 2010.

In its 2011 Report the Company explained that mislocates increased due to the nature and significant increase in communication fiber (fiber optic wire) installed during calendar year 2011 and that, in an effort to remedy this development, it is adding stub services to its Geographic Information System (GIS) maps to better assist utility locators in identifying services. The very slight difference in the mislocate rate reported for 2012, combined with the fact that there is only three years' worth of data available for this metric, makes it impossible to assess whether the Company's efforts have been successful. The Department will continue to monitor this reporting requirement and will provide additional analysis and comment as warranted.

#### *I. DAMAGED GAS LINES*

The gas system damages metric indicates the number of incidents under the control of CenterPoint employees and contractors, or other sources. The Company reported 859 incidences of gas system damage for 2012, which is an increase of 77, or approximately 10 percent, over 2011 and an increase of 154, approximately 23 percent, since 2010. There were 166 incidences due to the actions of Company employees or its contractors, an increase of 11 or approximately 7 percent over 2011, and an increase of approximately 86 percent over 2010. There were 670 incidences arising from all other causes in 2012, an increase of 66 or approximately 11 percent, over 2011 and an increase of 77, or 13 percent, since 2010.

Nearly all of the increase in damages experienced in 2012 were caused by others not affiliated with CenterPoint. In its Report, the Company explained that there was an increase of "No Locate Ticket" damages of 37 over 2011 and an increase of instances in which a contractor failed to adequately hand dig a line of 24 over 2011. These two categories account for 61 of the 66 additional damages caused by others reported in 2012. The Company stated in its Report that it has worked with both the Minnesota Office of Pipeline Safety and Gopher State One Call to address the increased damages in these two categories. The Department appreciates the additional information the Company provided to explain the increased line damages reported in

2012 and its efforts to address the issues identified. The Department looks forward to reviewing next year's report for indications showing that the Company's solutions were successful.

*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 those due to CenterPoint Energy employees and contractors, or other unplanned causes. This Report marks the second year that the Company had data available for the entire calendar year.

The total number of customers affected by natural gas service interruptions in 2012 was 1,554 resulting from 689 outages, a decrease in interruptions from the 5,317 affected customers reported for 2011. The (weighted) average duration of these outages was 70 minutes, an increase from the 62-minute average reported for 2011.

When broken down by type of interruption, incidences related to utility employees or contractors accounted for 119, or approximately 17 percent, of the total outages and 643, or approximately 41 percent, of affected customers in 2012. In 2011, utility employees were responsible for 174 damage incidents which caused outages for 3,889 customers. In terms of all other causes, 911 customers were affected by 570 interruptions in 2012 and, in 2011, 1,428 customers were affected by 459 outages.

In terms of outage duration, the outages caused by CenterPoint employees or contractors averaged 29 minutes in duration while those associated with other causes lasted an average of 66 minutes. In 2011, employee-caused outages lasted an average of 51 minutes and outages associated with other causes lasted an average of 62 minutes.

The Report indicated that monthly average outage lengths exceeded two hours in one month<sup>16</sup> of 2012, and in that month the average outage was two hours and four minutes. The Department notes that the Company has lowered the high range of its monthly outage durations from 2011 to 2012.

The Department notes that outages resulting from Company employees or contractors decreased in 2012 while total outages increased. The Company stated in its Report that the increase in the total number of outages reported in 2012 is correlated to the increase in damages reported. The Department is satisfied that the Company has addressed these issues as described in the gas system damages section of the Report and in section *I.* of these *Comments*. The Department will review next year's report for indications showing that the Company's efforts to reduce gas system damages were also successful in reducing service interruptions.

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<sup>16</sup> November

*K. MNOPS REPORTABLE EVENTS*

The 09-409 *Order* also required CenterPoint to provide summaries of all major events that are immediately reportable to the Minnesota Office of Pipeline Safety (MnOPS) and provide contemporaneous reporting of these events to both the Commission and Department when they occur.

The Company began providing this information starting with its calendar year 2010 annual report, reporting 18 reportable events in 2010, 47 in 2011, and 63 reportable events in 2012. The Company provided a brief summary of the reportable events in its Report. While the number of MnOPS reportable events continued to increase in 2012, the Department notes that many of these events may be outside of the Company's control. Given this context, and the limited data currently available, it is difficult to know what an average or acceptable level of events would be. The Department will continue to monitor and comment on this metric in future reports.

*L. GAS EMERGENCY 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 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 MnOPS as Company aggregates. This is the fourth calendar year for which this information is available.

The percentage of emergency gas calls responded to in one hour or less in 2012 was 93.5 percent, which is an improvement of nearly 5 percent over the 88.9 percent reported in 2011. The 2012 results are the highest level that CenterPoint has reported in the four years it has reported this metric.<sup>17</sup> The Department commends the Company on its ability to continue to improve response times in 2012.

In terms of call volume, the Company reported 34,481 calls received in 2012, a decrease from the 39,655 calls received in 2011. The Department notes that this 13 percent decrease may have contributed to the improvement in emergency response time in 2012.

*M. CUSTOMER SERVICE RELATED OPERATIONS AND MAINTENANCE EXPENSES*

The Commission requires each gas utility to provide data regarding customer-service related operations and maintenance (O&M) expenses recorded in FERC Accounts 901 and 903. This Report is the third in which the Company has provided data addressing this reporting

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<sup>17</sup> CenterPoint responded to 88.2 percent of calls in under an hour in 2010 and 90.02 percent in 2009.

requirement. The Company provided monthly and annual costs. CenterPoint reported total customer service expenses in 2012 of \$24,900,000, ranging from \$1,754,000 (November) to \$2,223,000 (December) per month. In 2011, CenterPoint reported O&M expenses of \$25,403,000, ranging from \$1,720,000 (December) to \$2,466,000 (June) per month. The Department notes that O&M expenses decreased from 2011 to 2012 and were the lowest for any of the three years. The Department will continue to monitor this statistic and will offer further comments as more years of data are provided

### **III. SUMMARY AND CONCLUSIONS**

Based on its review of CenterPoint's 2012 *Annual Service Quality Report*, the Department recommends that the Commission accept the Company's Report pending the provision of responses to various inquiries in *Reply Comments*. The Department requests that the Company provide the following in *Reply Comments*:

- its opinion on whether service quality in call center answer times 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 it experienced increased complaints in the categories of Disconnect Non-Pay and Web/Customer Self Service/IVR in 2012.

/ja

Natural Gas Service Quality Reporting Workgroup  
Reporting Summary and Changes

	Xcel Energy	CPE	MERC	IPL	GP
<b>Call Center Answer Times</b>	Change: None. Already include IVR and billing calls.	Change: Eff with 2012 reports will add Service Level with IVR to Schedule 1.	Change: Eff with 2012 reports will add IVR calls to the telephone response information.	Change: None. Already includes IVR and all calls.	Change: None. Already include IVR calls.
Please describe how/what you report	Our report includes E&G residential calls to our call center representatives, business solutions center calls to our rep, credit calls, and IVR handled outage and billing calls. We report monthly volume and percentages based on the 80/20 Rule. We report calls 24/7.	Schedule 1: The percent of calls answered within 20 seconds or less during stated business hours, the average speed of answer and the total number of calls answered. Includes utility call center, emergency calls, and business customer hotline. ASA and total number of calls answered are reported as required in Docket G008/GR-04-901. Excludes calls that only utilized IVR functionality.	Our report includes monthly information for calls taken Monday through Friday, 8-5, the report includes average speed of answer and % of calls answered in 20 seconds or less. We also provide the similar information for calls coming into our emergency lines with the exception of the % answered in 15 seconds or less and is all calls taking 24/7. Does not include IVR calls.	Percentage of calls answered within 20 seconds, including both gas and electric data. Includes all calls 24/7, including IVR.	Total calls answered, percentage of calls answered in 20 seconds or less, and the average speed of answer. Includes calls during business hours (7 am to 7 pm) and includes IVR calls.
Able to include IVR calls in Telephone Response Metrics	We do include IVR handled outage and billing calls	We will add SL with the IVR included for Bill/Credit/Move (CIC - Residential) reporting to Schedule 1 beginning with January 2012.	MERC is able to include the number of IVR calls in the telephone response information.	Will continue to include	Will continue to include.
<b>Customer Deposits</b>	N/A	N/A	N/A	N/A	N/A
Please describe how/what you report	Our reported deposits are from residential customers that have filed for bankruptcy (both E&G)	Schedule 5: The number of move orders and the number and percentage of deposits required as a condition of service. Including deposits required for reconnection of service after disconnection due to credit issues.	Our report includes any deposits collected for the reporting year. We only collect from customers caught diverting (thief) service.	Deposit data is for new and reconnecting customers, consisting of both gas and electric data.	Deposits required as a condition for receiving new service.
<b>Customer Complaints</b>	Change: Eff with 2012 reports, submit May 1 Complaint report.	Change: None. Already includes the May 1 Complaint report.	Change: None. Already includes the May 1 Complaint report.	Change: Eff with 2012 reports, will include the May 1 Complaint Report.	Change: Eff with 2012 report, will include the May 1 Complaint Report. Eff with 2013 report, will include all calls received in the customer service center summarized by call type.
Please describe how/what you report	Customer advocate group- we report all complaints, source of complaint, type, and action we took and time to resolve by month. Call center- all calls that come into call center by customer type, complaint type, and action we took. By month- both E&G	Schedule 6: Number of recorded residential and commercial complaints, reason, type of complaint, action taken, time to resolve complaint and number of complaints received forwarded by outside agencies.	Our report categorize complaints by the following types, employee action/behavior, billing/meter reading issue, collection/disconnection issue, service quality, meter adjustment, outage, high bill. We then report time to resolve. This is broken into 3 categories, initially, within 10 days and > 10 days. We then report report complaint resolution by the following taking action as customer requested, agreeable compromise, not within the control of the utility and refuse customer request. We also indicate the # of PUC complaints. This is all reported on a monthly basis.	All customer complaints are tabulated. Data includes both gas and electric complaints.	Customer complaints that are escalated to a supervisor response. Complaints are reported by type, resolution timeframe, resolution type, and number forwarded by the MN CAO.

Xcel Energy	CPE	MERC	IPL	GP
<p>Customer advocate group- we report all complaints, source of complaint, type, and action we took and time to resolve- by month</p> <p>Call center- we report specific call codes that we previously determined could be indicative of a complaint, this ends up being the majority of calls- we then report this call center calls by customer type, call type, and action we took. By month-- both E&amp;G</p>	<p>AXEY/BEP Issue: Any Budget Billing Issue, do not understand, too high or too low, question how calculated</p> <p>Billing Errors: Bill print issues, adopted contract account errors, Landlord Agreement error</p> <p>Construction &amp; Maintenance: Excess footage fees, out of season charges, frost burners, cost to add, change, relocate meter, cost to change pressure, meter location, ice shields, barriers, atmospheric corrosion inspection (ACT)</p> <p>Credit Arrangements: GAP, Cannot afford/cannot pay, reasonably on time, defaulted arrangement, CWR arrangement, reconquer quote</p> <p>Disconnect Non-Pay: GULM, Wrongful Disconnect, thought had arrangements, did not receive notice, disconnected during CWR, reconquer fees, payment methods scheduling requirements</p> <p>Disputed Charges: Any dispute not involving an account currently in write off, Escrow, Investigation Bad Debt, landlord/tenant, disputes, foreclosures, divorce, roommate situations, disputed debt transfer, basic fee on inactive meter, dates of service (move in or out)</p> <p>Employee: CSR Error, Employee Misconduct</p>	<p>MERC reports all calls which the call center CSR believes to be a complaint. MERC has missed the CSRs to record all complaints through an automated process. When the CSR first looks at any account there is a pop up window which asks if the call is a complaint. This question must be answered before the CSR moves on. MERC reports the total number of complaints, breaks down the complaints by 7 different types, this breakdown is given by total number and percentage of total complaints. MERC provides the total numbers that are resolved initially, within 10 days and greater than 10 days. Complaint resolution is reported by total number and percentage. The resolution categories include taking action as customer requested, agreeable compromise, not within the control of the utility and refuse to customer PUC complaints. This is informational only as these complaints are included in the reported complaint numbers.</p>	<p>Billing Errors - All billing complaints except high bills, low bills, zero usage/consumption, adjusted bills.</p> <p>Inaccurate Metering - Field/engineering/construction/maintenance issues, meter reading issues.</p> <p>Wrongful Disconnection - Turn off or disconnect error, collections issues.</p> <p>High Bills - High bills due to usage or weather, billing issues.</p> <p>Inadequate Service - Customer service issues such as poor service, long waits, delayed responses, lack of follow-up.</p> <p>New Service Connection Intervals - New service issues relating to field/engineering/construction/maintenance departments.</p> <p>Service Restoration Intervals - Outage issues relating to field/engineering/construction/maintenance departments.</p> <p>Payment Status - Late payment, incorrect payment amount, late payment penalty, missing payment, promise to make payment, remained payment fee.</p> <p>Turn-on - Issues with turn-on order for service, wrong date, not complete, not issues correctly, lack of customer contact.</p> <p>Meter Reading/Other - Meter reading issues such as no read/estimate/mis-read, read cycle, reader access, reader behavior, read route cycle.</p> <p>Payment Arrangement - Payment agreements - short and long-term, new defaults, multiple agreements, agreement disputes, promise to pay.</p> <p>Credit &amp; Collections General - Bankruptcy, collection agency/bureau issues, customer assistance programs.</p> <p>Property Damage - Reports of damage to customer property/equipment, claims, insurance questions, locates, construction, line clearance, outages, weather.</p> <p>Tree Trimming - Issues with tree trimming - not verified, trimmed too much, trimmed too high, did not like way trimmed, trim cycle.</p> <p>Engineering, Construction, Maintenance Other - No call back, non-emergency safety issues, outages, periodic meter change, planned maintenance/outages, power quality, radio interference, street/security lights.</p> <p>Power Quality &amp; Reliability - Outages, blinks, quality issues.</p> <p>Customer Payment Programs - Programs such as Automatic Payment, Paperless Billing, Waterers Union, CheckFree, Budget Billing, Customer Assistance programs.</p> <p>Non-Billing Billing - Bill details, Contribution Tax Adder bill detail disputes changes, business responsibility, finance charges.</p> <p>General Billing Questions/General Other - All other.</p>	<p>High Bill: Customer initiated complaint regarding high usage (must be usage related, not simply high balance)</p> <p>Inaccurate Metering: Switched piping, inaccurate pressure gauge, misread, non-engineering meter.</p> <p>EXT/programming, meter change, unannounced reads</p> <p>Collections/Inactive/Write-Off: Account sent to collections, any collection agency related complaint</p> <p>Inadequate Service: Failure to accommodate customer expectations hold times, not following through with promised actions</p> <p>Web/Customer Self-Service/TVR: Online Billing, My Account Online, Password locked web issues, bill reminders, TVR Spanish option, difficulty navigating</p> <p>Payment Issue: One Time Pay, encoding error, mixing payments, incorrect application, processing delay, returns check, late fee/due date, Energy Assistance payment, Bank Pay issue</p> <p>Rate/Tariffs: Refusal of Service, Interim Rates, franchise fees, taxes, basic charge, delivery charge</p>

Provide description of what is being reported in the Complaint numbers.

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	Xcel Energy	CPE	MERC	IPL	GP
Provide description of what is being reported in the Complainant numbers (continued).	Security Deposit: Cannot afford, question calculation, not returned, interest Service Order Scheduling: Anything appointment related, wait time, appointment windows, scheduling policies, missed/late appointment Other: Legal Access, Postcard, Claims/Restoration, BP Verification, CTR, Marketing, Vehicle Operation Pinpoint: Any complaint involving transfers part of the Pinpoint initiative Decoupling/TBR: Any complaint pertaining to the Inverted Block Rate (tiered pricing and/or Decoupling				
Whether MERC should be required, in future annual reports, to further categorize the complaints included in the category "my bill is too high"	N/A	N/A	MERC is willing to look at trying to further categorize these types of complaints. It most cases these are customers who's perception is their bill may be too high based on various factors such as media reports or low gas costs (why does gas cost me \$1,007/Dth when the media is telling me it's only \$2,000), weather impact, etc. In most cases it is CRGs taking time to explain what goes into a bill or that the weather wasn't actually as warm as the customer may think.	N/A	N/A
How MERC, in future annual reports, should report on estimated, informal complaints, including those received by the Commission's Consumer Affairs Office	N/A	N/A	MERC believes it is reporting all those complaints.	N/A	N/A
How Xcel, in future annual reports, should report on call center complaint resolution effectiveness (Xcel did not include this information in its 2010 report).	The vast majority of our call center complaints/calls are resolved upon their initial inquiry. However, we are looking into ensuring the timeframe for the small percent of remaining calls.	N/A	N/A	N/A	N/A
Whether utilities should be required to file copies of their annual customer service reports (required under Minn. Rules, part 7820.0500), whether those requirements overlap with the information provided in the annual gas service quality reports, and how these requirements compare and are reconciled.	While it seems redundant to file the same report in two different docket, if it would be helpful to parties, we do not oppose. The reports are different: one annual customer complaint report under 7820.0500 details the numbers resolved/unresolved as well as total customer numbers. The info provided in our SQ reports under 7820.2000 doesn't provide this info, but breaks it down into categories, sources, by month, time resolved, action taken etc.	Schedule 17: Currently including a copy of the report filed, as required in Docket No. G008/CR-04-901.	This seems redundant and hopefully this can be reviewed and determined that the gas service quality fulfills this requirements.	Not a hardship to supply - this is already being done for electric.	Copy of report will be provided.



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	Xcel Energy	CPE	MERC	IPL	GP
<b>Meter Reading</b>	<p>Change: Eff with 2012 report, all utilities will report MR staffing levels by geographic location, whether MRs have other non-MR responsibilities, and whether AMR is deployed in each reported geographic area.</p>	<p>Change: Eff with 2012 report, all utilities will report MR staffing levels by geographic location, whether MRs have other non-MR responsibilities, and whether AMR is deployed in each reported geographic area.</p>	<p>Change: Eff with 2012 report, all utilities will report MR staffing levels by geographic location, whether MRs have other non-MR responsibilities, and whether AMR is deployed in each reported geographic area.</p>	<p>Change: Eff with 2012 report, all utilities will report MR staffing levels by geographic location, whether MRs have other non-MR responsibilities, and whether AMR is deployed in each reported geographic area.</p>	<p>Change: Eff with 2012 report, all utilities will report MR staffing levels by geographic location, whether MRs have other non-MR responsibilities, and whether AMR is deployed in each reported geographic area.</p>
Please describe how/what you report	<p>Under 79261400 we report # and % of meters read by NE and customers by month. We report # and % of unread meters for 6-12 months and 12+ months, by month, and a classification for why they haven't been read for all customer classes. We also report staffing levels by work center in accordance with the Rule.</p> <p>We also note that our reported numbers of meters read and estimated under 79261400 do not add to 100 percent because the Rule includes only the number of meters estimated for the more consecutive months. Any meters estimated for a single month, up to a total of five months, are not included in the reported numbers.</p> <p>We report both E&amp;G</p>	<p>Schedule 2: The number of residential, commercial and total number of meters to be read by month, the number of residential, commercial, total and percentage of meters read from actual meter readings by CPE personnel, the number of residential, commercial, total and percentage levels for the metro area and greater Minnesota. The number of residential, commercial, total and percentage of meters not read within 6-12 months and greater than 12 months.</p>	<p>MERC reports monthly total meters, meters company read and meters estimated or self-read. MERC is not able to differentiate between an estimate or a self-read. The percentage of company read and self-read is provided along with # and % of meters not read in a 6-12 month period and those not read &gt; 12 months. Comments are also provided as to why meters were not read during those periods. Because of the number of firm customers MERC has we report both with and without firm taps included. Firm taps are required by company being required to read them once annually. MERC also provides meter reading staffing levels. MERC does not have dedicated meter readers in all areas of the State. MERC relies on labor reports and provides a FTE estimate based on hours spent reading meters.</p>	<p>Meter reading performance by month including both gas and electric data.</p> <p>The number and percentage of meters read by utility personnel, self-read by customers, or estimated. Also the number and percentage of meters not read by utility personnel for periods of 6-12 months and longer than 12 months with description as to why. Also provide meter-reading staffing levels by area.</p>	<p>The number and percentage of meters read by utility personnel, self-read by customers, or estimated. Also the number and percentage of meters not read by utility personnel for periods of 6-12 months and longer than 12 months with description as to why. Also provide meter-reading staffing levels by area.</p>
Whether the utilities' data on the number of unread meters and unexplained meter readings is consistent with the utilities' data on the number of estimated billings under Minn. Rules, part. 7920.3400.	<p>Yes - we believe we are in compliance with the Rules.</p>	<p>The difference between the total number of meters and the number of meters read by the utility or its customers is the number of estimated meter readings due to an unread meter.</p>	<p>Yes</p>	<p>We include unexplained in our total.</p>	<p>Yes.</p>
Development of a more accurate and comparable method of reporting meter reading staffing levels and whether it is relevant for meter-reading staffing levels to be reported by work center or geographical area.	<p>We have an integrated meter reading workforce and AMR system. We currently report by work center in compliance with Rule 7926.1400 in our electric SQ report. We support maintaining this work center reporting consistent for both our gas &amp; electric SQ reports.</p>	<p>Reported by geographic area, metro and greater MN.</p>	<p>For informational purposes only, MERC believes this information can be included as currently reported. Comparison from company to company is difficult at best based on geography, AMR, etc.</p>	<p>IP: is meeting its meter reading requirements with current staffing levels and does not feel it would be beneficial or relevant to complicate the reporting method. IP: service territory and customer count is comparably low, so this would provide minimal comparative value.</p>	<p>Currently reported by geographic area.</p>
Are "special"/ "rebill" reads included in reported Actual and Estimated meter read numbers?	<p>No.</p>	<p>On the 2011 report, the outreach and rebills were included in the counts of actual bills and estimated bills. For 2012, special or-rebill meter-readings will not be included in the reported Actual and Estimated meter read numbers.</p>	<p>No.</p>	<p>Special or rebill meter readings are not included in the reported Actual and Estimated meter read numbers. As a point of reference, IPL only has 58 special bill customers.</p>	<p>No.</p>
<b>Involuntary Service Disconnections</b>	<p>Change: Eff with 2012 report, all utilities will include a summary modeled after the 2011 CPE summary of Cold Weather Rule reports.</p>	<p>Change: None.</p>	<p>Change: Eff with 2012 report, all utilities will include a summary modeled after the 2011 CPE summary of Cold Weather Rule reports.</p>	<p>Change: Eff with 2012 report, all utilities will include a summary modeled after the 2011 CPE summary of Cold Weather Rule reports.</p>	<p>Change: Eff with 2012 report, all utilities will include a summary modeled after the 2011 CPE summary of Cold Weather Rule reports.</p>
Please describe how/what you report	<p>Consistent with Order point 2D of the 8/26/10 Order Docket No. G999/CI-09-409, we reference the CWR docket but do not include any of the information in our gas report</p>	<p>Schedule 3: The month ending Minnesota Cold Rule Compliance Questionnaire in a column format by month with all months reported. (Copy Doc 6).</p>	<p>MERC provides the monthly CWR Compliance Questionnaire that is filed monthly with the Commission.</p>	<p>Included a copy of monthly Cold Weather Rule reports included in appendices.</p>	<p>Number of customers who received disconnection notices, # that sought Cold Weather Rule protection, who were granted protection, and whose services were disconnected involuntarily (All data from Cold Weather monthly reports).</p>
Whether to require utilities to include in their annual service quality reports copies of the information they submit under Minn. Stat. §§ 21.03.03 and 21.03.06 (and/or summaries of this information), and if so, in what format.	<p>This was addressed in the Commission's August 26, 2010 Order in Docket No. G999/CI-09-409, but we do not oppose providing.</p>	<p>The information is summarized into a monthly matrix rather than including copies of each individual report.</p>	<p>The filings are available so including them is not an issue.</p>	<p>Provided in 2011 report.</p>	<p>Effective with 2012 report, will provide a summary of the monthly Cold Weather reported data.</p>
Separate out credit-related reconstructions to report just non-credit-related? If not, include the # of disconnections as a way to approximate just non-credit-related disconnections.	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>IP: was able identify that 314 of the 6,704 reconstructions reported in the 2011 report were credit-related, leaving a total of 6,390 non-credit related service connections.</p>	<p>N/A</p>

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Service Extension Request/Response Times	Xcel Energy	CPE	MERC	IPL	GP
<p>Change: None. Already excludes reconnections for non-payment. Connections to current customers are included in total connections.</p> <p>We report requests to service to our locations: both number of installations and average # of days to complete between request and completion by month. We do not report requests to locate previously served as the only people that we classify in this group are customers who have had their meter locked due to credit. We classify those reconnections for service upgrades or rework with our requests for new service - we classify them all together. This report is gas only.</p>	<p>Change: None. Already excludes reconnections for non-payment. Connections to current customers are included in total connections.</p> <p>Schedule 4: The number of commercial and residential service extensions, the average number of days to complete from the time the property is ready until installation is complete for the service extension. The report also includes the same information for requests where an existing service exists and the meter has been turned off for reasons other than non-payment.</p>	<p>Change: None. Already excludes reconnections for non-payment.</p> <p>This does seem like a waste of time. The reports have indicated that the utilities do a good job in getting service indicated in these instances. If delays were occurring on regular basis the Commission would be receiving complaints. I've seen nothing to indicate this has been an issue.</p>	<p>Change: None. Already excludes reconnections for non-payment.</p> <p>Report includes monthly information for new service requests for residential and commercial service installations (gas only data). It indicates the # of requests and the average time between requested date and installation. The report also includes the same information for requests where an existing service exists and the meter has been turned off for reasons other than non-payment (gas and electric data).</p>	<p>Change: None. Already excludes reconnections for non-payment. Connections to current customers are included in total connections.</p> <p>The number of extensions and average days to complete for New Service (locations not previously served) and Renewed Service (locations previously served).</p>	<p>Change: None. Already excludes reconnections for non-payment. Connections to current customers are included in total connections.</p> <p>GP provided days between receipt of service line application and date meter was installed. We do not have an efficient means of tracking days between requested meter installation date and actual install date. GP reports excluding this data from the reports - no situational dependent.</p>
<p>Whether utilizes should be required to report the number of requests for services to previously served locations and the time required to complete these requests</p>	<p>Aside from those customers who had their meter locked due to credit, which the Commission said not to include in their 8/26/10 Order) We do report this, we have not (and can not) break them out from the new customers - our reporting combines them all into one group (both new and current customers).</p>	<p>Currently reporting, excluding locked meters related to credit issues.</p>	<p>Currently excluding.</p>	<p>Will exclude reconnections associated with non-payment.</p>	<p>Currently excluding.</p>
<p>Whether to exclude from the gas service quality reports the number of reconnections and restoration of service requests that were processed after a meter was locked for non-payment of a bill and which are also reported under Minn. Stat. § 21.03.091 and 21.03.096.</p>	<p>The Commission's August 26, 2012 Order in Docket No. G999/C1-09-09 said to not need to include this, so we have not.</p>	<p>Currently excluding.</p>	<p>Currently excluding.</p>	<p>Will exclude reconnections associated with non-payment.</p>	<p>Currently excluding.</p>
<p>Misallocates</p>	<p>Change: None. Already excludes reconnections for non-payment. Connections to current customers are included in total connections.</p>	<p>Change: None.</p>	<p>Change: None. Reports in this fashion for 2011 report.</p>	<p>Change: None. Reports in this fashion for 2011 report.</p>	<p>Change: None. Reports in this fashion for 2011 report.</p>
<p>Please describe how/when you report</p>	<p>We define misallocates as 2 gas line that was damaged as a result of misrouting or failure to mark a line. We divide the number of misallocates by the number of locate tickets to get the mislocate rate.</p>	<p>Schedule 8: The number of misallocates due to misrouted lines, failure to mark a line, total number of misallocates, total number of locate tickets and number of misallocates per 1000 locate tickets.</p>	<p>MERC reports monthly total locates, # of misallocates and the % of misallocates. This report would only include those misallocates resulting in damage as MERC has no other consistent means of tracking this information.</p>	<p>Total locate requests for both gas and electric, including number of gas lines damaged due to misrouted or failure to mark.</p>	<p>The number of locate tickets requests received through the MN One Call system and the number of misallocates categorized as either due to a not marked line or a mis-marked line.</p>
<p>Whether to require MERC, Xcel, Intersense, and Great Plains to provide the same level of underlying detail on the total number of misallocates (the number of misrouted lines and the number of failures to mark a line) that CenterPoint provided in its 2010 report.</p>	<p>Yes, we can do this. It will be based on whether there was a paint or not, which we understand is the same way CPE does it. Beginning in 2012 b/c of a new rule, MNOPS requires reports only for damages that result in a leak - so our service quality reporting will report more than our MNOPS reports.</p>	<p>N/A</p>	<p>With the very low number of misallocates I question the value of this information.</p>	<p>IPL will separate out mismarked vs. not marked in the 2012 report.</p>	<p>GP provided the split between lines not marked and mis-marked lines and will continue to do so.</p>
<p>Assess whether can follow the Mislocate criteria provided by CPE</p>	<p>Yes we can.</p>	<p>Determines whether a line is misrouted or failed to be marked. CPE performs an investigation on all gas damages using flow the procedures by the locator to identify a locate was required to verify if the locate was marked or not. If there was a paint in the area of the damage they are not within the 24 inch tolerance zone CPE determines the reason of the change to be marked. If there are no visible markings/paint at the post-locate pictures at the site of the damage CPE determines this root cause to be a failure to mark.</p>	<p>MERC photographs all line locates prior to excavation. If damage occurs MERC will go back to the locate spot (assuming a locate was required) to verify if the locate was marked or not. If it is identified the locate was accurate according to 21.03 the contractor will be billed. If it is identified MERC or its contractor mislocated the facility the information is then included in the mislocate report portion of the Service Quality report.</p>	<p>IPL can break out the mis-locates and failure to mark items, but will need to investigate further our ability to calculate an error rate as gas and electric locate tickets are not broken out separately. IPL will attempt to report mislocates using the CPE criteria in the 2012 report.</p>	<p>Great Plains investigates each damage to determine who is at fault either company or contractor/locator also determine if locates are off or not located at all. Results are documented, but we do not take pictures of locates at this time.</p>
<p>Separate out the electric Misallocates to get gas-only?</p>	<p>N/A. Only reports natural gas misallocates.</p>	<p>N/A</p>	<p>N/A</p>	<p>In 2011, IPL had five (5) gas misallocates/lines not marked that resulted in damage to gas facilities. In 2012 report, will report gas-only misallocates.</p>	<p>N/A</p>

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	Xcel Energy	CPE	MERC	IPL	GP
<b>Gas System Damage</b>	<p>Change: None. Order Pt. 5 of the Commission's Oct 11, 2012 Order in Docket No. G999/AA-10-885 sets the requirements for reporting the lost gas implications associated with at-fault contractor main strikes.</p>	<p>Change: None. Order Pt. 5 of the Commission's Oct 11, 2012 Order in Docket No. G999/AA-10-885 sets the requirements for reporting the lost gas implications associated with at-fault contractor main strikes.</p>	<p>Change: None. Order Pt. 5 of the Commission's Oct 11, 2012 Order in Docket No. G999/AA-10-885 sets the requirements for reporting the lost gas implications associated with at-fault contractor main strikes.</p>	<p>Change: EIS with 2012 report, will report gas damage by month. Order Pt. 5 of the Commission's Oct 11, 2012 Order in Docket No. G999/AA-10-885 sets the requirements for reporting the lost gas implications associated with at-fault contractor main strikes.</p>	<p>Change: Will continue to provide in future annual reports, the detail requested. Order Pt. 5 of the Commission's Oct 11, 2012 Order in Docket No. G999/AA-10-885 sets the requirements for reporting the lost gas implications associated with at-fault contractor main strikes.</p>
Please describe how/what you report	<p>We report gas line damages on a monthly basis classified by whether they were damaged by XE and our contractors or other causes. We then provide our miles of main and the damage calculated per 100 miles of main.</p>	<p>Schedule 9. Damages by CPE Employees/Contractors, gas line damages, total damages, miles of pipe, damages per 100 miles of pipe.</p>	<p>MERC reports on a monthly basis the total number of gas line damages and whether they were the fault of MERC or its contractors, damaged by others or a system integrity failure.</p>	<p>Number of gas system damages, including whether the damage was caused by those working on behalf of the utility and also what the damage is attributed to (power equipment, hand digging, strikes, etc.)</p>	<p>The number of gas system damages, categorized as to whether the damage was caused by a GP employer/contractor or caused by any other unexplained cause. Also included is miles of pipe and damage per 100 miles of pipe calculation.</p>
Whether to require: Interstate to report in future annual reports the gas damage data by month.	N/A	N/A	N/A	IPL will report gas damage by month in the 2012 report.	N/A
Whether to require: Great Plains and Greater Minnesota Gas to include in future annual reports data on the type of party (third-party contractors, utility personnel, customer) who caused each particular damage event.	N/A	N/A	N/A	N/A	GP will provide the detail requested in the 2012 report.
How the utilities account for lost gas when there is an incident of any kind that results in lost gas who pays for the lost gas and who pays for the cost of repairing damaged lines when the damage is not caused by the company or its contractor, as well as when the damage is caused by the company.	<p>Lost gas reporting set in Docket No. G999/AA-10-885. Amounts billed for cost of repairs from contractor damage bills are an offset to O&amp;M expenses.</p>	<p>Lost gas reporting set in Docket No. G999/AA-10-885. Contractors billed for cost of repairs. Amounts received from contractors is an offset to O&amp;M expenses.</p>	<p>Lost gas reporting set in Docket No. G999/AA-10-885. All at-fault contractors are billed for damages. Amounts received are an offset to O&amp;M expenses.</p>	<p>Lost gas reporting set in Docket No. G999/AA-10-885. All at-fault contractors are billed for cost of repairs. Amounts received are an offset to O&amp;M expenses.</p>	<p>Lost gas reporting set in Docket No. G999/AA-10-885. All at-fault contractors are billed for cost of repairs. Amounts received are an offset to O&amp;M expenses.</p>
<b>Gas Service Interruptions</b>	<p>Change: None.</p>	<p>Change: None.</p>	<p>Change: EIS with 2012 report, will provide calculated outage times.</p>	<p>Change: EIS with 2012 report, will provide calculated outage times.</p>	<p>Change: None.</p>
Please describe how/what you report	<p>We report gas service interruptions on a monthly basis classified by whether they were damaged by XE and our contractors or other causes - within those categories we include the number of homes, the number of incidents, and the average outage time.</p>	<p>Schedule 10. Report outages due to CPE Employees/Contractors, outages due to others and total indicating the number of customer affected, number of outages, and the average duration of the outage. Also provide in Schedule 11 detail of MNOPS reportable events and system integrity events.</p>	<p>MERC provides monthly information of total service interruptions and whether they were caused by a MERC employee or contractor, others or system integrity. A monthly detailed report is also included indicating the duration of the interruption.</p>	<p>Reported all gas service interruptions, including the numbers of customer affected.</p>	<p>All gas service interruptions, including the number of customers affected and the average duration of the outage, categorized according to whether the interruption was caused by a GP employer/contractor or by any other unexplained cause.</p>
Whether Xcel should continue providing gas service interruption information in the five categories used for October through December 2010.	Already changed in 2011 report	N/A	N/A	N/A	N/A
Whether Xcel should be required to summarize its gas service interruption data using the two categories of gas service interruption as required and used by the other companies. These two categories are (1) customer outages due to Xcel employee or Xcel contractor and (2) customer outages due to any other unexplained cause. Or whether this information should be reconciled with the more detailed, five-category reporting method Xcel currently uses.	Already changed in 2011 report	N/A	N/A	N/A	N/A
Service Interruptions & Integrity Events - Define calculations for Average Outage Time and Total Outage Time	<p>The start of the outage is when it's noted in our system that the gas is off; if that is not noted, we use the creation time of the order. The end of the outage is when it's noted that gas is on; if that is not noted, we use the completion time of the order. The total outage time is the time for all the outages of that time period. The average outage is the total outage time divided by the number of homes affected.</p>	<p>CPE calculates the average duration for monthly outages by taking the total outage time for the month and dividing that by the number of customers lost.</p>	<p>MERC has not provided an average for outage times. MERC is willing to provide this in future Service Quality filings. MERC calculates total outage time as beginning when the outage is reported and completed when service is restored to the last affected customer.</p>	<p>IPL has not previously reported statistics related to outage times.</p>	<p>Total outage time is the time from notification of the outage until service is restored to the last customer. Average outage time equals the total outage minutes divided by the total customers out of service.</p>

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Reporting Summary and Changes

Gas Emergency Answer Times	Xcel Energy	CPE	MERC	IPL	GP
<p>Please describe how/what you report</p>	<p>Change: Eff with 2012 reports, include internal performance goal for answering gas emergency calls (% percent in x seconds).</p> <p>We report calls from our MN customers either directly to our Gas Emergency line or to one of our other customer service numbers where the customer selected the option for a gas emergency- we report the monthly number of gas emergency calls as well as the average speed of answer for those calls.</p>	<p>Change: Eff with 2012 reports, include internal performance goal for answering gas emergency calls (% percent in x seconds).</p> <p>Schedule 7: The percent of calls received on our published emergency line answered MGR within 20 seconds, the average speed of answer and the total number of calls answered. This line may also receive calls other than emergency calls. ASA and total number of calls answered are reported as originally required in Docket G008/GR-04-901.</p>	<p>Change: Eff with 2012 reports, include internal performance goal for answering gas emergency calls (% percent in x seconds).</p> <p>MERC provides the monthly total calls received, average speed of answer and % answered in 15 seconds or less. MERC also provides the each response time from initial call to arrival for all emergency calls. The numbers are categorized by &lt; 1 hour or &gt; 1 hour. MERC also breaks this information down on by service region as requested by the Department. MERC provides the monthly average response time with its goal of having an average response time of 30 minutes or less.</p>	<p>Change: Eff with 2012 reports, include internal performance goal for answering gas emergency calls (% percent in x seconds).</p> <p>Both gas and electric callers who respond "yes" to the initial interactive voice response question "Is this a life threatening emergency, such as a downed wire or gas odor?"</p>	<p>Change: Eff with 2012 reports, include internal performance goal for answering gas emergency calls (% percent in x seconds).</p> <p>Total calls answered, percentage of calls answered in 20 seconds or less, and the average speed of answer.</p>
<p>Whether to require Xcel to include in its future annual service quality reports the number of gas emergency calls in addition to the average answer time for these calls.</p> <p>Whether to require the gas utilities to include in their annual reports their goals (internal performance metrics) for answering gas emergency calls in terms of the percentage of calls answered within XX seconds</p>	<p>Already included in 2011 report</p> <p>Internal goal is 80/20, though we place a priority on gas emergency calls.</p>	<p>N/A</p> <p>Overall goal of answering 80% of calls within 20 seconds annually for all types of calls.</p>	<p>N/A</p> <p>MERC already provides this information.</p>	<p>N/A</p> <p>We strive to meet the goal of 80%.</p>	<p>N/A</p> <p>Internal goal is 80/20, with a priority placed on gas emergency calls.</p>
<p>Gas Emergency Response Times</p> <p>Please describe how/what you report to the PUC</p>	<p>Change: Eff with 2012 reports, will provide MnOPS reports.</p> <p>We report all gas emergency calls- the count, the answer and talk time, the dispatch/crossover time, travel time, and then the total response time, as well as all averages and % of calls responded to under and over 60 minutes. (Our gas emergency calls classifications are: blowing gas, explosion, fire, carbon monoxide with and without symptoms, lead regulator, smells gas inside, smells gas outside, no gas, and high or low pressure)</p>	<p>Change: N/A. Already provides MnOPS reports.</p> <p>Schedule 12: The reporting metric is the time from the initial notification to the time that a qualified emergency response person arrives at the incident location for purposes of making the area safe. Emergency response times are reported, by metro and outstate, as calls responded to in one hour or less and calls responded to in over one hour. CenterPoint Energy provides number and the percentage of emergencies responded to within one hour and within more than one hour. CenterPoint also provides the average number of minutes it takes to respond to an emergency. This same information, in total, is reported in the Emergency Response Report to the Minnesota Office of Pipeline Safety (MnOPS).</p>	<p>Change: Eff with 2012 reports, will provide MnOPS reports.</p> <p>MERC provides the each response time from initial call to arrival for all emergency calls. The numbers are categorized by &lt; 1 hour or &gt; 1 hour. MERC also breaks this information down on by service region as requested by the Department. MERC provides the monthly average response time with its goal of having an average response time of 30 minutes or less.</p>	<p>Change: Eff with 2012 reports, will provide MnOPS reports.</p> <p>Any call coded as a gas emergency (CO, fire, gas hit, odor) will be included in PUC submittals.</p>	<p>Change: Eff with 2012 reports, will include an average response time calculation.</p> <p>Emergency response calls categorized by calls responded to in 1 hour or less and calls responded to in over 1 hour. Also report the average response time in minutes.</p>
<p>Please describe how/what you report to MnOPS</p>	<p>We report five more types of calls in our gas QSR reports than we do in our MnOPS reports based on MnOPS preference (we do not report on any types of carbon monoxide calls, ice/snow on regulator, no gas, and high/low pressure gas to MnOPS).</p>	<p>Provide Monthly required reporting as specified by MnOPS and is duplicated in our PUC report.</p>	<p>Same as above</p>	<p>Any call coded as a gas emergency (CO, fire, gas hit, odor) will be included in MnOPS submittals.</p>	<p>Same information is reported to MnOPS on the monthly Emergency Response Reporting Form.</p>
<p>Define call types included in MnOPS Reports</p>	<p>We report the following call types: Blowing gas, explosion, fire, smells gas inside, smells gas outside</p>	<p>The orders that make up this report include all calls received from customers, contractors, passer-bys, 911 dispatcher, or company personnel relating to: gas odors, gas leaks, indications of high pressure, fires, incidents, hit gas lines (either inside or outside).</p>	<p>MERC Res 2 annual reports with MnOPS. One report provides emergency call responses in 1 hour or less and those over 1 hour. This report is for all gas leak calls and does not include those that specifically state it is a carbon monoxide call. The other report, Annual Utility Damage Report form, provides the total number of locate requests, total number of damages and the cause for those reported damages. There are 11 categories for the cause for damage.</p>	<p>IPL codes the following issues as emergency calls: Carbon Monoxide, Fire, Line Hit, and Odor.</p>	<p>GP reports fire, explosion, line hit, and odor calls.</p>

Natural Gas Service Quality Reporting Workgroup  
Reporting Summary and Changes

	Xcel Energy	CPE	MERC	IPL	GP
Highlight any differences between MnOFS Reports and MPUC reported items.	See above. We report five more types of calls in our gas QSP reports than we do in our MNOPS reports, based on MNOPS preference.	We report the same items.	In the MPUC report MERC provides the % of calls answered in < 1 hour and > 1 hour and the average response time. For misdiagnoses MERC reports the total number of failures same as the MnOFS report but does not have a misdiagnose reason. The MPUC has only 3 categories, system integrity, fault of MERC, or its contractors and other.	None. Any call that is coded as an emergency will be included in the statistical reports submitted both to the Commission and MNOPS.	Great Plains was directed to report all gas service interruptions regardless of qualifying as reportable to MnOFS in Docket No. G004/M-11-363.
Whether to require Great Plains to provide, in future annual reports, an average response time calculation for all gas emergency responses.	N/A	N/A	N/A	N/A	GP will provide this information in the 2012 report.
Whether to require the gas utilities to provide, in future annual reports, complete and non-redacted copies of their MnOFS Emergency Response Reporting Forms.	Already included in 2011 report	Currently providing monthly Emergency Response Forms	Only if it eliminates the need to report the same information in the emergency response time in the quality report.	Not an issue to provide this. Will include in the 2012 report.	GP attaches the complete and non-redacted copies of the MnOFS form to its Service Quality Report.
Whether to require the gas utilities to provide, in future annual reports, reconciliations between the gas emergency response numbers reported in their annual service quality reports and the numbers reported to MnOFS in the MnOFS Emergency Response Reporting Forms.	It is not possible to reconcile the existing service quality and MnOFS reports due to the breakdown of the categories not matching due to how the 2 reports require different definitions and the differing req's to start/stop of the QSP v. MNOPS forms.	Currently using MnOFS reports to complete Service quality reporting.	No opinion either way.	These numbers should be the same and could be provided.	GP reports the same information
Consider input from the Department on review of those reconciliations, including whether the utilities are accurately reporting their gas emergency response times and reporting data using the correct gas emergency response time metric.	As part of the Working Group, it was determined that all utilities will provide MnOFS reports for their annual reports, so no reconciliation is necessary. The Xcel (QSP) report will additionally be provided as additional reporting that provides an alternative view of its emergency response (as summarized above).	As part of the Working Group, it was determined that all utilities will provide MnOFS reports for their annual reports, so no reconciliation is necessary.	As part of the Working Group, it was determined that all utilities will provide MnOFS reports for their annual reports, so no reconciliation is necessary.	As part of the Working Group, it was determined that all utilities will provide MnOFS reports for their annual reports, so no reconciliation is necessary.	As part of the Working Group, it was determined that all utilities will provide MnOFS reports for their annual reports, so no reconciliation is necessary.
<b>Major Incident Reporting</b>	Change: With 2012 reports, will provide a summary of contemporaneous reports rather than each notification email.	Change: None	Change: None	Change: None	Change: None
Please describe how/when you report.	Similar to our electric reports, we provide a copy of every email we send to the CAO and the individual summary of the notification that was attached to it.	Provides a summary of all notifications from the year.	Provides a summary of all notifications from the year.	Provides a summary of all notifications from the year.	Provides a summary of all notifications from the year.
<b>Customer Service Related O&amp;M Expenses</b>	Change: None	Change: None	Change: None	Change: None	Change: None
Please describe how/when you report	We provide the customer service related O&M expenses included in FERC accounts 901 and 903 plus payroll taxes and benefits both for NSPM (which includes MN, ND and SD operations) as well as the state of MN.	Schedule 13, includes FERC accounts 901 and 903 plus payroll taxes and benefits.	MERC reports all expenses associated with FERC accounts 901 and 903 plus payroll taxes and benefits.	Costs related to FERC accounts 901 and 903, including payroll taxes and benefits.	The costs recorded in FERC accounts 901 and 903, plus payroll taxes and benefits.
<b>Additional Service Quality Reporting</b>					
Please describe any additional information included in annual service quality reporting.	QSP Tariff annual Gas Emergency Response report.	Schedule 14: Steel service line relocation costs, as ordered in Docket G008/M-09-1199	N/A	N/A	N/A
Please describe any additional information included in annual service quality reporting.	N/A	Schedule 15: Meters at 630 or Greater Cost, as ordered in Docket G008/M-09-1199	N/A	N/A	N/A
Please describe any additional information included in annual service quality reporting.	N/A	Schedule 16: Calls Received from Dedications Lines, as ordered in Docket G008/M-09-1199	N/A	N/A	N/A
<b>Docket Numbers</b>					
	2002-2011 - E-G002/CI-02-2024 2003 - E-G002/M-03-58 2009 - G002/M-09-84 (SQ TARIFF AMENDMENTS) 2010 - E-G002/CI-10-691 (TARIFF MODIFICATION) 2011 - G002/M-11-360 2012 - G002/M-12-440	2004 - G-008/GR-04-901 2005 - G-008/GR-04-901 2006 - G-008/M-06-1485 2007 - G-008/M-07-1641 2008 - G-008/M-08-396 2009 - G-008/M-09-390 & G-999/CI-09-409 2010 - G-008/M-10-378 2011 - G-008/M-12-425	2003 - G007/01/CI-02-1369 2004 - G007/01/CI-02-1369 2005 - G007/01/CI-02-1369 2006 - G007/01/CI-02-1369 2007 - G007/01/CI-02-1369 2008 - G007/01/CI-02-1369 2009 - G007/01/CI-02-1369 2010 - G007/01/CI-02-1369 2011 - G007/01/CI-02-1369	2010 - G-999/M-11-361 2011 - G-999/M-12-411	2009 - G-999/CI-09-409 2011 - G004/M-11-363 2012 - G004/M-12-442

Note: The focus of the workgroup was to identify methods for increasing uniformity in reporting among the gas utilities, making the annual comparisons of data for each utility easier, as well as more useful in assessing the reports and in setting any future reporting requirements.

**AGENDA**  
**Natural Gas Service Quality**  
**Utility Stakeholder Group**

*Meeting date: June 22, 2012*

**Follow-up Actions**  
*(Provide identified information/ responses to Xcel Energy)*

<b>Who</b>	<b>What</b>	<b>When</b>
<b>All Utilities</b>	Provide to-date SQ Dockets	Jun 29
	<u>Service Interrupts &amp; Integrity Events:</u> Define calculations for Average Outage Time and Total Outage Time	Jul 13
	Define call types included in MnOps Reports	Jul 13
	Highlight any differences between MnOps Reports and MPUC reported items	Jul 13
	Assess whether can follow the Mislocate criteria provided by CPE (see below)	Jul 13
	Provide description of what is being reported in the Complaint numbers.	Jul 13
<b>CPE</b>	Provide Summary of Cold Weather Rule reporting of involuntary service disconnects	Jun 29
	Provide criteria for when require a Deposit	Jul 13
	Are "special"/ "rebill" reads included in reported Actual and Estimated meter read numbers?	Jul 13
	Provide to attendees, criteria for Mislocate classification	Jun 29
	Include IVR calls in Telephone Response metrics?	Jul 13
<b>IPL</b>	Are "special"/ "rebill" reads included in reported Actual and Estimated meter read numbers?	Jul 13
	<u>Service Connect/Reconnect</u> Separate out credit-related reconnects to report just non-credit-related? If not, include the # of disconnects as a way to approximate just non-credit-related disconnects.	Jul 13
	Separate out the electric Mislocates to get gas-only?	Jul 13
<b>MERC</b>	Include IVR calls in Telephone Response metrics?	Jul 13
<b>GP</b>	<u>Service Connect/Reconnect</u> Separate out credit-related reconnects to report just non-credit-related? If not, include the # of disconnects as a way to approximate just non-credit-related disconnects.	Jul 13

**AGENDA**  
**Natural Gas Service Quality**  
**Utility Stakeholder Group**

**Recommendations/Decisions**

- The workgroup output will be a completed all-utility matrix of the “current state” reporting that additionally includes:
  - Metric reporting definitions;
  - Any go-forward reporting modifications that will achieve or improve reporting consistency across the utilities; and,
  - The effective date of noted reporting changes.

**In Go-Forward Annual Reports:**

- Include the May 1 Compliant report that is required by Minn. R. 7820.0500.
- Meter Reading Staffing Levels:
  - Report by geographic location;
  - Include text re; whether Meter Readers have other/non-meter reading responsibilities; and,
  - Indicate whether AMR is deployed in each reported area.
- Involuntary Service Disconnects: Include a summary modeled after the 2011 CPE summary of Cold Weather Rule reports.
- Lost Gas: Include a statement that provides a “tie” to the lost gas related to system damages issue that is going on in the AAA Docket(s).
- Provide MnOps event reports.
- Provide a summary of contemporaneously-reported events/incidents, rather than the actual email notifications sent at the time of the event.

## **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-13-352**

Dated this 27<sup>th</sup> day of **June, 2013**

**/s/Sharon Ferguson**



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