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PO Box 59038
Minneapolis, MN 55459-0038

March 31, 2020

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

RE: In the Matter of a Commission Investigation into Natural Gas Utilities' Practices, Tariffs, and Assignment of Cost Responsibilities for Installation of Excess Flow Valves and Other Similar Gas Safety Equipment

Compliance Filing

Docket No. G-999/CI-18-41

Dear Mr. Seuffert:

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or the "Company") respectfully submits this filing complying with Ordering Point Number 4 of the Commission's July 31, 2019 Order in this docket.

I. Introduction

The Company is required to reach out to K-12 schools, universities, colleges, hospitals, multi-unit residential buildings, and nursing facilities that do not have an excess flow valve ("EFV") installed but are eligible under the federal standard for EFV installation. The Company is required to have meetings with the decision makers for those customers regarding the purpose of EFVs and manual service line shutoff valves, the Company's installation policy, and estimated costs.

The Company filed a plan for reaching out to this set of customers and daycares on December 18, 2018 and provided additional information on its plan in Reply Comments on March 28, 2019. As the Company explained in those filings, most of the customers in this set have an assigned Key Account Manager ("KAM"), but charter schools and daycares are not assigned to KAMs. The Company estimated that it could meet with customers that have a KAM over the course of four years. For daycares and charter schools, the Company planned to hire a third-party contractor to meet with those customers and to complete those meetings over the course of two years.

II. Progress in Meeting with Customers

In compliance with the Commission's Order, the Company has begun its outreach efforts to customers.

The Company first prepared email and mail communications for the customers. These communications provide some information about excess flow valves and curb valves and request that the customer reply in order to set up a meeting time. The customer email is attached as Exhibit A.¹

The Company has also hired a third-party vendor to complete outreach to customers that do not have a KAM.

The Company plans to start by reaching out to each of these customers by email, and then, if the customer does not respond, another email, then a letter, followed by two phone calls. The table below summarizes the Company's efforts so far. Note that one point of contact may be the decision maker for multiple accounts.

Annual EFV Communications and Responses

First Email Sent	Customer Replies	Follow Up Meeting Scheduled
31 decisions makers representing 259 accounts	6 decisions makers representing 45 accounts	6 decisions makers representing 45 accounts

There are 731 accounts that have not yet received their first email communication. So far, one customer has requested an engineering analysis to determine if an EFV may be feasible for them.²

Please feel free to contact me at 612-321-4334 or erica.larson@centerpointenergy.com with any questions about this filing.

Sincerely,

/s/ Erica R. Larson

Erica R. Larson
Regulatory Analyst

C: Service List

¹ Note that the Company is scheduling phone calls rather than face-to-face meeting with customers in response to the COVID-19 pandemic.

² As the Company has noted in previous filings, it is not possible to determine definitively whether an EFV is feasible for a particular customer without a case-specific engineering review.

Exhibit A: Customer Communications

Docket No. G-999/CI-18-41

March 31, 2020

From: [REDACTED] on behalf of [REDACTED]
To: [REDACTED]
Subject: Important Excess Flow Valve information – please reply
Date: Monday, March 23, 2020 4:02:00 PM
Attachments: [Excess Flow Valve Fact Sheet.pdf](#)

Dear [REDACTED]

I am reaching out, because I would like to speak with you about excess flow valves.

Excess flow valves are designed to help stop the flow of natural gas when a service line is damaged. Excess flow valves are not able to protect against leaks beyond the meter.

Federal law requires excess flow valves to be installed on newly constructed or replaced natural gas lines.* On existing service lines, it's up to you, the customer, to choose whether to install one.* If you choose to have CenterPoint Energy install an excess flow valve, you will be charged for any excavation and surface restoration costs. Attached you can find a fact sheet with additional information on excess flow valves.

Please reply to schedule a time to discuss or indicate your interest

I would like to schedule a brief time with you to further discuss the purpose, installation process and costs for excess flow valves and service line shutoff valves over the phone. Please reply to this email indicating your interest and availability or call me at [REDACTED]. If you are not interested in excess flow valves for the service addresses listed below, please also reply to this email to let me know.

The information provided above is pertaining to the following Service Address[s], Account and Meter Number[s]:

[REDACTED]

Service Address	Contract Account	Meter Number
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		

Thank you and I look forward to hearing from you,

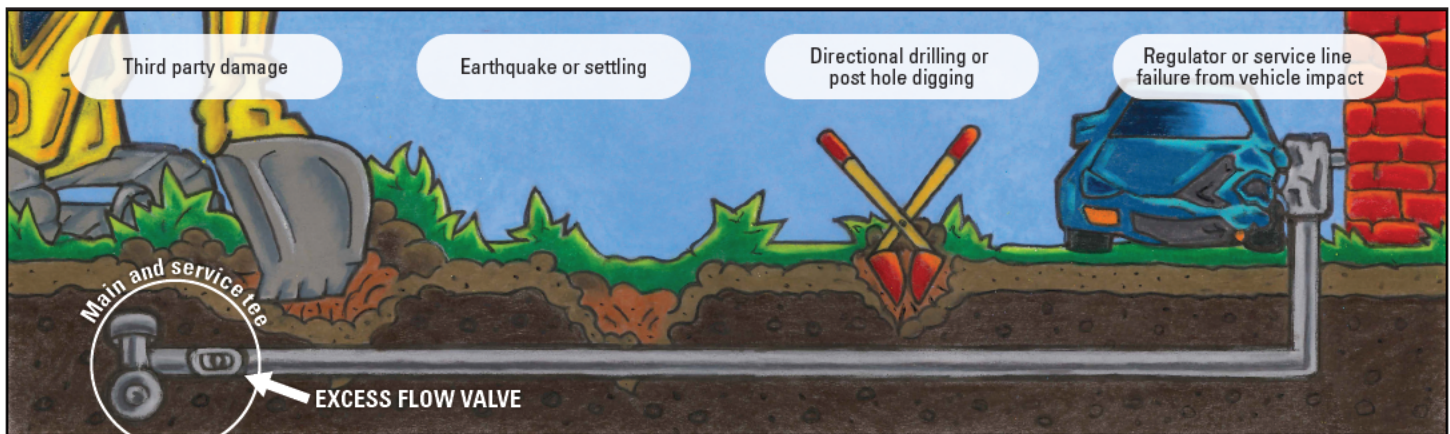
[REDACTED]

Key Account Manager

**Some exceptions apply due to operating limitations.*

Excess flow valves (EFV) are devices that can be installed by CenterPoint Energy on your business' natural gas service line (the underground line that runs from the main line to the meter). They are designed to stop the flow of natural gas, such as when a service line is damaged due to excavation or other similar activity. In this scenario, the EFV automatically activates to help prevent the release of natural gas — reducing the chance of natural gas fires and explosions, personal injury and property damage. EFVs are not able to protect against leaks beyond the meter.

Excess flow valves are limited to automatic shutoff in the following circumstances:



With or without an EFV, and outside of natural causes, these damages can be avoided by following the law and calling 811 (or your local One Call Center) to mark the location of underground utilities at least 48 hours (two working days) before excavation.

Federal law now requires EFVs to be installed on newly constructed or replaced natural gas lines, although some exceptions apply due to operating limitations. A service line shutoff valve, also referred to as a curb valve, is an option if operating limitations do not allow the installation of an EFV. A curb valve allows manual shutoff of the service line in the boulevard area. Each service line needs an engineering evaluation to determine if an EFV or curb valve is applicable.

On existing service lines, it's up to the customer (that's you!) to choose to install one at his or her own expense. Only CenterPoint Energy can install EFVs. Cost can vary depending on how difficult the installation is, but most CenterPoint Energy customers can expect an average price of about \$800. When a customer requests installation of an EFV or curb valve, the customer pays the costs of excavation and surface restoration related to the installation. CenterPoint Energy pays for materials, overheads and labor to install and any other related costs. Service size and site conditions may increase the costs. Once installed, there is no cost to the customer to maintain it. Installation will occur on a mutually agreeable date.

Learn More

Are you curious if your business has an EFV or curb valve? If you would like to learn more about having one installed, please contact your CenterPoint Energy key account manager, call CenterPoint Energy customer service at 612-321-5123, or check out frequently asked questions at [CenterPointEnergy.com/ExcessFlowValve](https://www.CenterPointEnergy.com/ExcessFlowValve).

CERTIFICATE OF SERVICE

Erica Larson served the above Compliance Filing and exhibit of CenterPoint Energy to all persons at the addresses indicated on the attached list by having the document delivered by electronic filing.

/s/ _____

Erica Larson
Regulatory Analyst
CenterPoint Energy

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck, ND 585014092	Electronic Service	No	OFF_SL_18-41_Official
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_18-41_Official
David	Blomseth	davidb@communitycoops.com	Community Co-ops of Lake Park	PO Box 329 14583 Hwy 10 W Lake Park, MN 56554	Electronic Service	No	OFF_SL_18-41_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-41_Official
Randy	Dooley	rdooley@dooleypetro.com	Dooley's Natural Gas LLC	3101 3rd Ave SW Willmar, MN 56201	Electronic Service	No	OFF_SL_18-41_Official
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400 Plymouth, MN 554475142	Electronic Service	No	OFF_SL_18-41_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_18-41_Official
Mike	Gorham	mike@nwgas.com	Northwest Gas of Cass County L.L.C.	1608 NW 4th St Grand Rapids, MN 55744	Electronic Service	No	OFF_SL_18-41_Official
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4 h St Bismarck, ND 58501	Electronic Service	No	OFF_SL_18-41_Official
Jack	Kegel	jkegel@mmua.org	MMUA	3025 Harbor Lane N Suite 400 Plymouth, MN 55447-5142	Electronic Service	No	OFF_SL_18-41_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Allen	Krug	allen.krug@xcelenergy.com	Xcel Energy	414 Nicollet Mall-7th fl Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-41_Official
Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-41_Official
Douglas	Lund	doug.lund@ufcmn.com	United Natural Gas, LLC	705 E. 4th Street PO Box 461 Winthrop, MN 55396	Electronic Service	No	OFF_SL_18-41_Official
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-41_Official
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_18-41_Official
Catherine	Phillips	catherine.phillips@we-energies.com	We Energies	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_18-41_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_18-41_Official
Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-41_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-41_Official
Rachel	Sorrentino	rachel@nwgas.com	Northwest Gas	1608 NW 4th St Grand Rapids, MN 55744	Electronic Service	No	OFF_SL_18-41_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-41_Official
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-41_Official
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-41_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_18-41_Official
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-41_Official
Tim	Thompson	tthompson@lrec.coop	Lake Region Electric Cooperative	PO Box 643 1401 South Broadway Pelican Rapids, MN 56572	Electronic Service	No	OFF_SL_18-41_Official
Teresa	Wenninger	teresa.wenninger@ufcmn.com	United Farmers Cooperative	PO Box 461 Winthrop, MN 55396	Electronic Service	No	OFF_SL_18-41_Official
Mary	Wolter	mary.wolter@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_18-41_Official