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July 11, 2013

Dr. Burl Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

RE: Reply Comments of CenterPoint Energy
Docket No. G008/M-13-352

Dear Dr. Haar:

CenterPoint Energy (the Company) submits these *Reply Comments* in response to the *Comments* of the Minnesota Department of Commerce (Department) in the matter of the Company's 2012 *Annual Service Quality Report* (Report). The Company appreciates the Department's thorough review and analysis of the Report. In its *Comments*, the Department recommended acceptance of the Report, pending the Company's submission of additional information.

The Department requested the Company provide:

- "its opinion on whether service quality in call center answer times has diminished in recent years"; and
- "a full description of ongoing and/or planned efforts to improve call center answer times".

The Department's *Comments* correctly stated that the Company's 12-month average percentage of calls answered within 20 seconds has decreased since 2010, but the Company believes that service quality remains at a satisfactory level based on the reported metrics. As stated in the Report, "CenterPoint Energy's goal is to achieve an 80/20 service level for a 12 month, calendar basis."¹ This goal is the same as the electric utilities' standard: "On an annual basis, utilities shall answer 80 percent of calls made to the business office during regular business hours within 20 seconds."² As previously discussed, CenterPoint Energy manages its resources toward achieving the 80/20 goal on an annual basis. Furthermore, it is important to note that there will be differences in monthly performance results based on seasonal variations and unique events throughout the year. The Company continues to monitor call center performance, looking for opportunities to improve the quality of customer service while

¹ Report, p. 1.

² Minn. Rules 7826.1200, Subpart 1.

still managing the CenterPoint Energy workforce to meet the 80/20 annual goal.

In addition, CenterPoint Energy appreciates the Department's discussion that "that the Company's performance in this requirement increases drastically when calls answered using the Company's IVR system are included." As more straight-forward customer calls are completed by self-service options, the IVR system has become a substantial factor in CenterPoint Energy's service quality; the percentage of IVR-only calls out of total calls handled increased from 18.1% in 2010 to 25.9% in 2011 to 31.8% in 2012.³ While the Company believes a service-level metric that excludes IVR-only calls provides an incomplete measure of responsiveness to customer calls, CenterPoint Energy will continue to manage toward an 80/20 goal that excludes IVR-only calls until the Commission instructs otherwise.

The Department also requested the Company provide:

- "a full explanation of why it experienced increased complaints in the categories of Disconnect Non-Pay and Web/Customer Self Service/IVR in 2012."

The increase in Disconnect Non-Pay complaints may be related to increases in the number of disconnection notices sent and the number of disconnections due to nonpayment. As shown on Schedule 3 (lines 20 and 23) of the 2011 and 2012 Annual Service Quality Reports, the total number of disconnection notices sent increased from 206,533 in 2011 to 239,378 in 2012, and the number of disconnections due to nonpayment increased from 23,022 in 2011 to 26,573 in 2012.

The primary reason for the increase Web/Customer Self Service/IVR complaints was that this specific category did not exist in 2011. In July 2012, the category Online Customer Service was combined with additional complaint issues that had been previously grouped in the category Other; the change was made to improve the Company's handling and tracking of related complaints. In addition, the number of Web/Customer Self Service/IVR complaints may also have been related to the increase in the volume of IVR-only calls from 2011 to 2012 (314,099 and 372,660 respectively).

If you have any questions about this information, please contact me at (612) 321-4905.

Sincerely,

/s/

Aaron Crowell
Regulatory Analyst

cc: Service List

³ Since the IVR system is available to customers over weekends and holidays (when customer service representatives are unavailable to handle calls), the call volumes that include IVR-only calls are reported for all days in the year.

AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

Aaron Crowell, being first duly sworn on oath, deposes and says he served the attached reply comments of CenterPoint Energy in Docket No. G008/M-13-352 via e-filing to the Minnesota PUC, as well as those requesting electronic service on the service list and to all others on the service list via U.S. Mail at the city of Minneapolis.

_____/s/_____
Aaron Crowell

Subscribed and sworn to before me
this 11th day of July, 2013.

_____/s/_____
Mary Jo Schuh, Notary Public
My Commission expires 1/31/15

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_13-352_M-13-352
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