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October 4, 2024

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

**Re: CenterPoint Energy Resources Corporation d/b/a CenterPoint Energy Minnesota
Gas 2023 Gas Service Quality Annual Report**

Docket No. G-008/M-24-33

Reply Comments

Dear Mr. Seuffert:

CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas (the "Company") respectfully submits Reply Comments in response to the Comments of the Minnesota Department of Commerce ("Department") filed on September 23, 2024, in this docket.

The Company thanks the Department for their thorough analysis of the Company's 2023 Service Quality Report and the review of the Company's requests to change the reporting information. CenterPoint Energy is supportive of the Department's recommendations for the Company's reporting requirement changes.

The Department also provided details regarding reporting requirements within the existing Integrity Management Plan. The Company appreciates the additional insight and reasoning provided in support of maintaining the current nineteen cost and budget related reporting requirements, as well as insight into the discontinuation of the Company's current leak count reporting requirements, which will be replaced with the reporting requirements approved in Docket No. G-008/CI-22-548.

The Department requested the Company discuss the Direct Customer Service Full-Time Equivalent staffing in Minnesota between 2019 and 2024 in its Reply Comments. The Company reviewed the staffing numbers with the Customer Service Workforce team and found the reporting methodology changed with a transfer of work that occurred following a change in

leadership of the Workforce team in 2023. The 2023 Full-Time Equivalent positions based in Minnesota using the current reporting methodology is 64, giving a total of 76.

Additionally, it is standard practice for the Company to monitor call volume and adjust staffing levels to match the needs of our customers. As shown in the report, 2019 staffing reflects pre-pandemic levels designed to meet expected call volume. At the start of the pandemic in 2020 through 2021, call volume declined, and the Company, chose to not replace positions as the staffing levels would have exceeded the level needed to provide support to our customers. As the call volume increased in 2022 and 2023, our staffing levels increased.

Sincerely,

/s/ Sherry Kemmetmueller

Manager, Regulatory Affairs
Regulatory Services

C: Service List

CERTIFICATE OF SERVICE

On Friday, October 4, 2024, Whitney Peterson certifies that she served the Reply Comments of CenterPoint Energy to all persons at the addresses indicated on the attached service list for Docket No. G-008/M-24-33 by having the document delivered via electronic filing.

/s/ Whitney Peterson _____
Executive Assistant
CenterPoint Energy

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_24-33_M-24-33
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_24-33_M-24-33
Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.	505 Nicollet Mall 3rd Floor Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-33_M-24-33
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_24-33_M-24-33
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_24-33_M-24-33
Emily	Suppes	emily.suppes@centerpointenergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-33_M-24-33
Donald	Wynia	donald.wynia@centerpointenergy.com	CenterPoint Energy	CenterPoint Energy 505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-33_M-24-33