COMMERCE DEPARTMENT

September 28, 2023

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th 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-23-79

Dear Mr. Seuffert:

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

> CenterPoint Energy Resources Corporation, d/b/a CenterPoint Energy Minnesota Gas – 2022 Gas Service Quality Annual Report.

Emily Suppes, Manager of Regulatory Affairs, CenterPoint Energy filed the report on May 1, 2023.

Based on its review of CenterPoint Energy's 2022 Gas Service Quality Report (Report), the Department recommends the Minnesota Public Utilities Commission (Commission**) approve the Report**. The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ ANGIE SKAYER
Financial Analyst

AS/ar
Attachment

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce
Division of Energy Resources

Docket No. G008/M-23-79

I. INTRODUCTION

The Minnesota Public Utilities Commission (Commission) initiated and increased the reporting requirements for natural gas local distribution companies (LDCs) regarding service quality and reliability in 2009.[1] The primary proceeding was Docket No. G999/CI-09-409[2] and the key Commission *Order* was dated August 26, 2010.[3] As a result, Minnesota natural gas local distribution companies are required to file annual reports with information pertaining to service quality standards.

The Commission began to refine the required information the LDC's provided in the 15 different reporting requirements. For example, in an Order dated March 6, 2012 in Docket No. G002/M-11-360 *et al*., the Commission directed all regulated Minnesota natural gas utilities to provide additional information on the following topics: 1) call center response times, 2) estimated meter reads, 3) service extension requests, 4) customer deposits, 5) Minnesota Office of Pipeline Safety (MNOPS) emergency calls, and 6) call center complaints.[4]

The Commission provided further refinement to the Call Center Response Time metric in its November 25, 2015 *Order* in Docket No. G008/M-15-414. This Order required CenterPoint Energy Minnesota Gas (CenterPoint or the Company) to provide interactive voice response (IVR) system "zero-out" data in future reports.[5]

In its March 15, 2010 *Order* in Docket No. G008/M-09-1190,[6] the Commission required CenterPoint to submit information on the costs associated with steel service line relocation and the relocation of meters operating at pressures of 630 cubic feet per hour (CFH) or greater.

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[1] These requirements are modeled after the electric utility standards contained in Minn. Rules, Chapter 7826.

[2] https://efiling.web.commerce.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={C77EEA35-CCC6-4136-B368-8F10E2EAFE35}&documentTitle=20105-50666-04

[3] https://efiling.web.commerce.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={39B1250D-BD40-41CD-8597-483E5832F750}&documentTitle=20108-53874-01

[4] https://efiling.web.commerce.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={02032A1D-DFE5-47D8-AB91-112C7B42A05C}&documentTitle=20123-72274-06

[5] When customers call CenterPoint, their calls are initially routed to the IVR (an automated system). CenterPoint "zeroes-out" of the IVR system customers who request to be transferred to speak to a Company representative.

[6] In the Matter of a Request by CenterPoint Energy, a Division of CenterPoint Energy Resources Corp. a Delaware Corporation, for Approval of the Company's Proposed Charges for Customer-Requested Work, Including Service Alterations and Winter Construction.

The Commission's April 12, 2019 *Order Accepting Report and Setting Additional Reporting Requirements* in Docket No. G008/M-18-312 required CenterPoint to provide additional information in the Company's 2018 report:

a. The utility's filing under 49 CFR 192.1007 (e): integrity management plan performance measures; monitoring results; and evaluation of effectiveness in a manner to establish a baseline for ongoing reporting.

b. A summary of any 2018 emergency response violations cited by MNOPS along with a description of the violation and remediation in each circumstance.

c. The number of violation letters received by the utility from MNOPS during the year in question.

d. A discussion of how to provide ongoing monitoring and metrics towards the deployment of Excess Flow Valves (EFV) and manual service line shutoff valves pursuant to the Commission's *Order* in Docket No. G-999/CI-18-41.

In addition, condition 10 of the *Stipulation*[7] in Docket No. G008/AI-18-517 required the Company to work with the Department and the Office of the Attorney General, Residential Utilities Division (OAG) to develop metrics and reporting requirements related to the Company's investments under its Distribution and Transmission Integrity Management Plans (DIMP and TIMP, respectively), including, but not limited to:

1. Leak rate by pipe material;
2. causes of leaks/incidents;
3. quantification of system risk;
4. quantification of reduction to system risk;
5. unit cost by pipe material;
6. comparison of budgeted to actual costs; and
7. quantification of cost savings resulting from reduced leaks.

On March 22, 2019, the Department filed Comments in Docket No. G008/GR-17-285,[8] requesting "for the Company's 2018 and 2019 Safety, Reliability, and Service Quality Reports, CPE provide a discussion regarding the impact of the interim rate refund issues on its service quality (as may be reflected in its customer complaint, call center response time, call center volume, and any other impacted metric)."[9]

On January 7, 2020, the Commission issued its *Order Setting Reporting Requirements* in Docket No. G008/M-19-300. In that *Order*, at Ordering paragraph 1, the Commission required CenterPoint to annually file the TIMP and DIMP data addressing the 29 metrics CenterPoint had been reporting and to update the three-year averages each year.

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[7] CenterPoint filed the *Stipulation* on October 26, 2018 under Docket No. G008/AI-18-517.
[8] *In the Matter of the Petition of CenterPoint Energy for Approval of an Affiliated Interest Agreement between CenterPoint Energy Minnesota Gas and Minnesota Limited*.
[9] See the Department's Initial Comments in Docket No. G008/GR-17-285 at page 6.

CenterPoint Energy filed its 2022 annual service quality report on May 1, 2023.[10]

II. DEPARTMENT ANALYSIS

The Department analyzes the annual report information by comparing the current service quality data to the data provided in prior years. The Department looks for trends and changes in the Company's service quality metrics to determine whether further information is needed and to summarize the data the Company provided over time. In addition, the Department reviews the annual report to determine whether it complies with applicable statutes, rules, and Commission Orders. Based on its review, the Department makes a recommendation to the Commission to either accept or reject the annual report.

The Department's analysis provides further detail and discussion on each service quality reporting requirement in the following sections.

A. CALL CENTER RESPONSE TIME

CenterPoint provided call response data excluding calls answered and resolved through its interactive voice response (IVR) system; however, the Company provided complete call center response time data, including calls answered and resolved via IVR, beginning in 2012.[11] Tables 1 and 1A provide details on CenterPoint's call center response times.

Except for the year 2014, CenterPoint's call center, on average, answers at least 80% of non-IVR calls in 20 seconds or less.[12] The Company's average non-IVR call answering speed consistently exceeded 20 seconds from year to year until 2022.[13]

[10] Attachment C of the *2022 Gas Service Quality Annual Report* is complete set of reporting requirements.

[11] At the request of the workgroup tasked with improving reporting consistency, the Company began including IVR-answered calls in its call center response data.

[12] This benchmark of answering 80% of calls in 20 seconds or less is located in the Commission's *Order* in Docket No. G999/CI-09-409 dated August 26, 2010.

[13] IVR calls are automated. Customers don't have to wait for a customer service representative to answer their call. Thus, average call response times are shorter for IVR calls than they are for non-IVR calls. For example, including IVR calls in the Company's 2022 results increased the average percentage of call answered in 20 seconds or less from 81% to 90% and the weighted average speed of answer from 31 to 13 seconds.

Table 1: CenterPoint Call Center Response Times, Excluding Calls Answered by the Interactive Voice Response (IVR) System[14]

Calendar Year	*Average Percentage (%) of Calls Answered in 20 Seconds or Less*	*Average Number of Seconds Before Calls Were Answered*	*Total Number of Calls Answered*
2012	82%	25	738,637
2013	81%	25	854,898
2014[15]	67%	47	943,870
2015	82%	23	977,155
2016	82%	25	845,956
2017	80%	23	805,360
2018	81%	21	849,828
2019	81%	21	834,873
2020	81%	18	590,899
2021	80%	20	625,389
2022	81%	31	776,647

Table 1A: CenterPoint Call Center Response Times, Including Calls Answered by the Interactive Voice Response (IVR) System[16]

Calendar Year	*Average Percentage (%) of Calls Answered in 20 Seconds or Less*	*Average Number of Seconds Before Calls were Answered*	*Total Number of Calls Answered*
2012	88%	17	1,171,297
2013	88%	16	1,330,798
2014	80%	28	1,606,827
2015	90%	13	1,750,366
2016	90%	13	1,631,160
2017	90%	12	1,601,296
2018	90%	10	1,747,231
2019	91%	10	1,777,600
2020	92%	7	1,412,418
2021	92%	8	1,460,323
2022	91%	13	1,757,166

CenterPoint experienced an increase in both its IVR and non-IVR calls in 2022 from 2021. The Company's non-IVR calls have increased (151,258 or 24%) in 2022 compared to 2021 and the Company's IVR calls have increased (296,843 or 20%). This increase can be attributed to COVID-19. As the Company transitions from a pandemic, it is seeing a return to its pre-COVID call volumes for both its non-IVR and

[14] Petition, page 1; Petition schedule 1.
[15] CenterPoint provided revised 2014 call center response time data in its 2016 annual service quality report; the revised data are reflected in Tables 1 and 1(a) of these Comments.
[16] Petition, page 1; Petition schedule 1.

IVR calls. This trend began in 2021 with a 6% increase over 2020 non-IVR calls, and 3.4% increase over 2020 IVR calls.

CenterPoint achieved a call response time of 20 seconds or less, of greater than 80% for non-IVR calls and 91% for IVR calls in 2022. In both non-IVR calls and IVR calls, the weighted average speed of answer increased from 2021.[17]

The Department concludes CenterPoint met the Call Center reporting requirements in 2022.

B. METER READING PERFORMANCE

Table 2 documents CenterPoint Energy's meter reading performance for the years 2012 through 2022.

Table 2: CenterPoint Meter Reading Performance[18]

Calendar Year	*Average Number of Active Meters*	**Percentage (%) of Active Meters Read by:**		**Monthly Average of the Number of Meters Not Read for:**		**Average Number of Meter Reading Personnel:**	
		CenterPoint	*Customers*	*6 - 12 Months*	*Over 12 Months*	*Minneapolis Metro Area*	*Greater Minnesota*
2012	827,468	98.31	0.0001	196	75	10	17
2013	826,555	98.21	0.0001	141	68	10	17
2014	835,010	98.09	0.0001	203	101	8	14
2015	844,010	98.31	<0.0001	163	112	7	11
2016	852,190	98.39	0.0001	133	68	7	11
2017	861,929	98.45	<0.0001	85	40	6	10
2018	871,388	99.58	<0.0001	41	28	6	9
2019	880,309	98.90	<0.0001	43	10	6	8
2020	891,591	99.44	<0.0001	70	25	6	7
2021	896,849	99.29	<0.0001	25	23	6	7
2022	912,897	99.19	<0.0001	46	9	5	7

Table 2 demonstrates CenterPoint continues to successfully read a high percentage of its meters. The average number of meters not read for 6 to 12 months increased by 84% in 2022; however the average number of meters not read for 13+ months decreased by 41% in 2022 from 2021. Both numbers were elevated in 2020, presumably due to the pandemic.

Compared to 2021, CenterPoint's Metropolitan area meter reading staff was reduced by one. The staffing level for greater Minnesota remained constant.[19]

[17] Petition, page 1;Petition Schedule 1.
[18] Petition, page1; Petition Schedule 2.
[19] Petition, Schedule 2.

The Department concludes CenterPoint met the meter reading reporting requirements in 2022.

C. INVOLUNTARY SERVICE DISCONNECTIONS

The Commission's G999/CI-09-409 *Order* required CenterPoint to provide involuntary service disconnection information as outlined in Minnesota Statutes §§ 216B.091 and 216B.096, which relate to the Cold Weather Rule (CWR). Table 3 provides a summary of the Company's involuntary service disconnection data from 2012 through 2022.

Table 3: CenterPoint Involuntary Service Disconnections[20]

Calendar Year	*Number of Disconnection Notices Mailed to Customers*	*Number of Cold Weather Rule (CWR) Requests*	*Percentage (%) of CWR Requests Granted*	*Number of Involuntary Disconnections*	*Percentage (%) of Involuntary Disconnections Restored within 24 Hours*
2012	239,378	61,602	97	26,573	79
2013	306,515	60,413	97	30,347	82
2014	327,527	58,087	98	21,064	83
2015	274,007	40,088	99	32,809	84
2016	261,852	88,518	99	33,327	83
2017	271,919	33,753	96	30,877	80
2018	288,265	34,321	96	30,455	84
2019	273,416	34,400	96	24,567	85
2020	79,808	23,286	97	2,640	15
2021	30,166	41,398	99	6,200	14
2022	196,375	64,236	92	19,913	14

Table 3 shows the number of disconnection notices mailed to customers, CWR requests, and involuntary disconnections. In 2021 CenterPoint disconnected 6,200 to customers due to non-payment. This number is significantly lower than the Company's average due to Governor Waltz's moratorium on COVID-19 utility disconnections. However, the moratorium ended on August 2, 2021 allowing utilities' to resume normal billing practices under Minnesota Statutes §§§§ 216B.096, 216B.0975, 216B.0976, 216B.098.[21] As a result, CenterPoint resumed its processes and issued 196,375 notices to customers and disconnected 19,913 for non-payment in 2022.

[20] Petition page 2; Petition Schedule 3.

[21] The residential protection statutes are as follows: Cold Weather Rule, Minnesota State Statute § 216.096; Disconnection During Extreme Heat Conditions, Minnesota State Statute § 216B.0975; Notice of Utility Disconnection, Minnesota State Statute § 216B.0976; and Minnesota State Statute § 216B.098.[21]

While CenterPoint increased its involuntary disconnections in 2022, the Company is still below pre-COVID-19 numbers. In addition, the Company has increased the number of Cold Weather Rule granted in both 2021 and 2022.

The Department notes the involuntary disconnections restored within 24 hours is unusually low; however the pre-Covid pattern appears to be starting to take shape. The Department believes due to the length of the moratorium and the size of the past due bills, it will take additional time for normalcy to return to the pre-pandemic calculation. The Department will continue to monitor this issue.

The Department concludes the Company has met the involuntary service disconnection reporting requirements for 2022.

D. SERVICE EXTENSION REQUESTS

The Commission's G999/CI-09-409 *Order*, required CenterPoint Energy to provide the service extension request information described in Minnesota Rules 7826.1600, items A and B except for the information already provided as outlined in Minnesota Statutes §§ 216B.091 and 216B.096, subdivision 11, in its annual report.[22] The Report presents data on service requested and subsequently extended to (1) locations that were *not* previously connected to the utility's system and (2) locations previously connected to the system.

Beginning in 2012, the Company revised its service extension reporting methods so new and renewed service orders would be reported consistently.[23] Tables 4 and 4A show the service extension request data the Company submitted for the years 2012 - 2022.

[22] https://efiling.web.commerce.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={39B1250D-BD40-41CD-8597-483E5832F750}&documentTitle=20108-53874-01

[23] During the years 2010 and 2011, CenterPoint did not report average number of days to complete installations for either residential or commercial customers.

Table 4: CenterPoint Service Extension Requests from New Service Locations[24]

Calendar Year	Residential Customers		Commercial Customers	
	Number of Service Installations	*Average Number of Days to Complete Installation*	*Number of Service Installations*	*Average Number of Days to Complete Installation*
2012	3,646	6	84	10
2013	4,432	8	370	9
2014	4,670	8	496	8
2015	4,786	8	541	8
2016	5,276	8	462	8
2017	5,803	9	467	8
2018	5,643	8	483	8
2019	5,459	8	524	8
2020	5,681	15	425	26
2021	7,906	16	665	26
2022	6,824	21	688	42

Table 4A: CenterPoint Service Extension Requests from Previously Served Locations[25]

Calendar Year	Residential Customers		Commercial Customers	
	Number of Service Installations	*Average Number of Days to Complete Installation*	*Number of Service Installations*	*Average Number of Days to Complete Installation*
2012	354	7	16	8
2013	419	10	32	10
2014	546	9	50	8
2015	591	9	69	9
2016	559	9	63	8
2017	564	9	51	8
2018	525	9	32	8
2019	476	8	49	9
2020	364	21	32	22
2021	10,546	21	1,170	23
2022	19,677	5	1,524	16

[24] Petition, page2; Petition, Schedule 4.
[25] Petition, page2; Petition, Schedule 4.

Tables 4 and 4(a) demonstrate some changes from 2020, 2021 and continuing into 2022. For residential customers, the average number of days to complete installations, for new service locations, increased by 31% while the average number of days to complete installations, for previously served areas, decreased by 75% in 2022. For commercial customers, the average number of days to complete installations, for new service locations, increased by 62% while the average number of days to complete installations, for previously served areas, decreased by 30% in 2022 .

In its May 7, 2021 Compliance Filing in Docket No. G008/M-21-303, the Company stated the increase in installation times from 2019 to 2020 and 2021 was due to COVID impacts and restrictions. In 2022, the Company states the increase in installation times is due to reporting process changes.[26] The Department reached out to CenterPoint via email for an explanation on the reporting changes in 2022, below is the Company's response:

> "The Company updated previous reporting to address internal work order status standardization for how the data is pulled for this report. The Company has two applications in managing these work orders: one is the primary application and the other is a mobile system construction crews are able to utilize when working in the field. The reporting changes that were made were to standardize the data for the window of time measured for "Time to Complete," when able, across the two applications."[27]

In 2022, CenterPoint's renewed installation time begins to decrease although the quantity of renewed service installations numbers is drastically increasing. The Department reached out to CenterPoint via email for an explanation and received the below response:

> "The Company previously updated the data parameter filters for the data extraction from our system to include additional job types that fall under the "renewed" service umbrella. These additional job types under "renewed" service installations included replacements, extensions, and test and connects. The changes from 2021 to 2022 do not appear to have significantly impacted the job code mapping changes to cause an increase to the Renewed Service Installations."[28]

The Department concludes the Company has met the service extension request reporting requirements for 2022.

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[26] Petition, page 3.
[27] Department Attachment 1, CenterPoint Response to Department Email.
[28] *Id.*

E. CUSTOMER DEPOSITS

In alignment with Minnesota Rules 7826.1900, which is applicable to regulated electric utilities, the Commission requires each natural gas utility to provide data on the number of customers required to make a deposit as a condition of receiving service.[29] Table 5 presents the customer deposit data CenterPoint submitted.

On page 3 of its Report, CenterPoint explained the Company "reports the number of new deposits required as a condition of service from customers that are subject to disconnection or have been disconnected for non-payment in Schedule 5." In addition, the Company notes its current deposit policy is exclusively applicable to commercial customer accounts.

Table 5: CenterPoint Customer Deposits[30]

Calendar Year	Number of Customer Deposits Collected	Number of Customer Deposits Held by CenterPoint on December 31
2012	397	2,343
2013	528	2,185
2014	533	2,132
2015	512	2,192
2016	534	2,106
2017	435	2,018
2018	569	2,070
2019	563	2,042
2020	208	1,839
2021	284	1,587
2022	316	1,637

According to the data CenterPoint submitted, the number of customer deposits collected as a condition of service in 2022, the Company required 316 deposits as opposed to 284 for 2021, which is less than 1% of the total number of service connections the Company performed. On Schedule 5 of the report, the Company erroneously reported the 2021 deposit number for 2022. The Department requested clarification and CenterPoint provided a new Schedule 5.[31]

The Department concludes the Company has met the customer deposit reporting requirements for 2022.

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[29] https://www.revisor.mn.gov/rules/7826.1900/
[30] Petition, page 3, and Schedule 5
[31] See Department Attachment 2: CenterPoint's Updated Schedule 5.

F. CUSTOMER COMPLAINTS

Table 6 summarizes select customer complaint data for the years 2012 – 2022. The table demonstrates the majority of CenterPoint's customer complaints have been consistently resolved upon initial inquiry.

Table 6: Customer Complaints for CenterPoint[32]

Calendar Year	*Number of Complaints Received*	*Number of Complaints Forwarded from the Consumer Affairs Office*	*Percentage (%) of Complaints Resolved Upon Initial Inquiry*
2012	5,000	77	60
2013	6,218	89	67
2014	6,770	88	75
2015	7,113	113	77
2016	6,739	58	79
2017	7,629	91	83
2018	7,298	135	82
2019	5,620	114	78
2020	2,733	56	79
2021	2,300	81	69
2022	3,597	162	74

This information is consistent with the theme of CenterPoint's 2020 SRSQ: the COVID-19 pandemic and actions taken as part of the peacetime emergency decreased the number of complaints received and the number of complaints forwarded to the Commission's Consumer Affairs Office (CAO). The Department anticipated the annual number of complaints received and the number of complaints forwarded to the CAO would return to normal levels in 2021, that did not happen exactly. While the number of complaints forwarded to the CAO increased in 2021 the actual number of complaints decreased. It was in 2022 CenterPoint's complaints begin to return to normal due to the ending of the COVID-19 moratorium on disconnections for past due bills. In 2022, CenterPoint reported the number of complaints forwarded by the CAO as 162 which is double that of 2021. In addition, the Department notes the percentage of complaints forwarded by the CAO in comparison to the overall complaints has grown since 2018. While still a small percentage, the Department believes this category merits continued monitoring for upward trends. As such, the Department will review the number of CAO forwarded complaints in the 2023 Service Quality Report.

The percentage of complaints resolved upon initial inquiry in 2022 remained somewhat consistent with historical figures, up 5% from 2021.

[32] Petition, page 5; Petition Schedule 6e.

Table 6A provides details on the Company's resolution of its customer complaints for the years 2012 - 2022. The data shows that, overall, CenterPoint has resolved complaints most often through either agreement with the customer or demonstrating to the customer the circumstances of the complaint were beyond the Company's control.

Table 6A: CenterPoint Residential Customer Complaints by Resolution Method[33]

Calendar Year	Percentage (%) of Customer Complaints Resolved by:				
	Agreement with Customer	*Compromise with Customer*	*Demonstrate that Circumstances are out of Company Control*	*Refuse Customer Request*	*Resolution Not Categorized*
2012	39	13	36	12	0
2013	35	14	41	10	0
2014	32	15	45	8	0
2015	28	16	49	7	0
2016	25	13	56	6	0
2017	26	10	58	5	1
2018	22	9	65	4	1
2019	15	16	63	6	1
2020	16	20	54	5	4
2021	20	12	58	5	5
2022	14	7	70	3	6

The Department is concerned with the overall change in percentages for resolution method from 2021. In 2021, 20% of residential complaints were resolved by agreement while in 2022 only 14% were resolved in this manner. Under the category compromise with customer, 12% of complaints were resolved in 2021 while only 7% in 2022. In 2022, the Company notes that two of the top three complaints revolved around disputed charges and payments.[34] The Department believes the ending of the moratorium on disconnections is the driver for the decrease in agreements and compromises with customers. However, the Department believes this should be monitored in the upcoming filings to ensure it is not a trend.

In 2013, CenterPoint began using a modified set of categories in its complaint data schedules compared to those in previous annual service quality reports. The major, overarching categories remained unchanged, but the Company eliminated a few complaint subcategories between 2012 and 2013.

CenterPoint's overarching complaint categories, as presented in its complaint data schedule, include the following:

- Billing Errors
- Inaccurate Metering
- Wrongful Disconnect

[33] Petition, page 5; Petition Schedule 6d.
[34] Petition, Page 4.

- High Bills
- Inadequate Service
- Service-Extension/Restoration Intervals
- Other

Certain overarching complaint categories contain subcategories. For example, the "Service-Extension/Restoration Intervals" category has the subcategories (1) Construction and (2) Service Order Scheduling. The Company consistently reports most of its customer complaints fall under the Billing Errors category, which, since 2013, has captured approximately 40 percent of reported complaints each year. Conversely, inaccurate Meter Readings represents the category under which the fewest customer complaints have been reported. The remaining overarching complaint categories capture a fluctuating percentage of total complaints reported from year to year.

The Department concludes the Company has met the requirements for Customer Complaints.

G. GAS EMERGENCY TELEPHONE CALLS

In its G999/CI-09-409 *Order*, the Commission required CenterPoint to provide information about the Company's emergency telephone line response time. The relevant metric reported is the average percentage of gas emergency phone calls the Company answered in 20 seconds or less. Table 7 shows the details relevant to emergency phone calls CenterPoint received for the years 2012 - 2022.

Table 7: Gas Emergency Phone Calls CenterPoint Received[35]

Calendar Year	*Number of Gas Emergency Calls*	*Average Number of Seconds Before Calls were Answered*	*Percentage (%) of Calls Answered in 20 Seconds or Less*
2012	69,207	13	90
2013	78,629	15	86
2014	89,576	21	77
2015	75,215	13	86
2016	77,111	12	89
2017	70,305	10	90
2018	75,193	17	86
2019	79,076	16	88
2020	54,824	9	91
2021	66,005	15	89
2022	74,420	9	92

[35] Petition, page 5; Petition Schedule 7.

CenterPoint answered 92% of its emergency phone calls in 20 seconds or less in 2022. The number of emergency phone calls made to the Company increased by 13% from 2021. The percentage of calls answered in 20 seconds or less increased by 3% while the average number of seconds before a call was answered decreased by 6 seconds.

The table shows CenterPoint consistently responds to its emergency phone calls in 20 seconds or less. Therefore, the Department concludes the Company has met the gas emergency phone call reporting requirements for 2022.

H. GAS EMERGENCY RESPONSE TIME

In compliance with the Commission's G999/CI-09-409 *Order*, CenterPoint reports information on its response time to gas emergencies. The important metric for this reporting requirement is the amount of time elapsed between when CenterPoint is first notified of the emergency and the time a qualified emergency response person *arrives* at the incident location to begin making the area safe. The Company reports its emergency response times by region; the Department combined the relevant regional data for documentation in Table 8.

Table 8: CenterPoint Gas Emergency Response Time[36]

Calendar Year	*Number of Emergency Calls Requiring Response*	*Percentage (%) of Calls Responded to in Less than One Hour*	*Percentage (%) of Calls Responded to in Greater than One Hour*	*Average Response Time in Minutes*
2012	34,481	94	6	30
2013	33,522	92	8	31
2014	37,339	90	10	34
2015	38,843	92	8	32
2016	39,167	90	10	35
2017	39,338	93	7	32
2018	41,795	92	8	33
2019	45,683	90	10	35
2020	36,737	97	3	28
2021	36,001	97	3	27
2022	37,332	97	3	25

CenterPoint responded to a smaller number of gas emergencies over the last three years than usual (down 18%) from 2019. The percentage of calls responded to in less than an hour has consistently remained at 97% and the average response time is down by about 31% over 2019. The Department concludes the Company has met the gas emergency response time reporting requirements for 2022.

[36] Petition, page 5; Petition Schedule 12.

I. MISLOCATES

The Commission's G999/CI-09-409 *Order* required CenterPoint to provide data on mislocates. Accordingly, the Company incorporates in its annual service quality reports (1) the number of locate tickets and (2) the number of mislocates that resulted in damage to a gas line, including damage resulting from a mismarked line or the failure to mark a line. Table 9 summarizes the information relevant to the Company's mislocates for the years 2012 - 2022.

Table 9: CenterPoint Mislocates[37]

Calendar Year	*Number of Locate Tickets*	*Number of Mislocates*	*Percentage (%) of Mislocates Relative to Locate Tickets*	*Mislocates per 1,000 Locate Tickets*
2012	264,733	97	0.04	0.37
2013	282,915	49	0.02	0.17
2014	299,354	81	0.03	0.27
2015	330,306	91	0.03	0.28
2016	342,140	98	0.03	0.29
2017	349,592	127	0.04	0.36
2018	344,541	167	0.05	0.48
2019	351,086	165	0.05	0.47
2020	359,301	137	0.04	0.38
2021	351,659	166	0.05	0.47
2022	340,486	148	0.04	0.43

In 2022, the total number of locate tickets decreased from 351,659 in 2022 to 340,486 in 2021, or a reduction of 11,173 or 3% from 2021. CenterPoint's number of mislocates and related metrics have generally trended upward since 2013; however with the Company's mislocate rate dropping in 2022, and CenterPoint returned to its 2017-2018 performance. This trend and CenterPoint's intended approach to address mislocate issues were previously discussed in the Department's initial Comments in Docket No. G008/M-18-312.[38]

The Department concludes the Company has met the mislocate reporting requirements for 2022.

J. DAMAGED GAS LINES

The Commission's G999/CI-09-409 *Order* required CenterPoint to provide summary data on gas line damage, including the number of damage incidents caused by (1) the utility's employees or contractors and (2) other factors beyond the utility's control. Table 10 outlines the Company's gas line damage information for the years 2012 - 2022.

[37] Petition, page 5; Petition Schedule 8.

[38] See Department initial Comments for Docket No. G008/M-18-312 at page 11. CenterPoint discussed its intention to use the following reports to better track and address its mislocate issues: (1) a monthly audit report, produced by each locate group, effective February 2018 and (2) a weekly report, listing all at-fault damages by locator.

Table 10: CenterPoint Damaged Gas Lines[39]

Calendar Year	**Number of Gas Lines Damaged**			*Miles of Gas Line Operated in Minnesota*	*Damage Incidents per 100 Miles of Gas Line*
	Caused by CenterPoint (A)	*Caused by Factors Outside of CenterPoint's Control (B)*	*Total (A + B)*		
2012	152	681	833	24,819	3.36
2013	124	538	662	24,874	2.66
2014	162	629	791	25,394	3.11
2015	195	738	933	25,427	3.67
2016	190	722	912	25,755	3.54
2017	190	740	930	25,911	3.59
2018	238	694	932	26,058	3.58
2019	234	715	949	26,160	3.63
2020	179	785	964	26,239	3.67
2021	204	731	935	26,463	3.53
2022	177	681	858	26,792	3.20

Consistent with years past, factors outside the Company's control caused a high percentage of gas line damages in 2022 (79%). CenterPoint reported a 13% decrease in damage incidents caused by factors within the Company's control in 2022 compared 2021. Overall, the total number of gas lines damaged decreased from 935 in 2021 to 858 in 2022 or 8.2%.

The Department concludes the Company has met the gas line damage reporting requirements for 2022.

K. SERVICE INTERRUPTIONS, INCLUDING MINNESOTA OFFICE OF PIPELINE SAFETY (MNOPS) REPORTABLE EVENTS

In its G999/CI-09-409 *Order*, the Commission required CenterPoint to provide a summary of service interruptions, including interruptions due to system integrity pressure issues and those reportable to the Minnesota Office of Pipeline Safety. Table 11 below provides details on the Company's natural gas service interruptions.

The number of service interruptions caused by CenterPoint are consistently fewer than interruptions caused by factors outside of the Company's control, although both figures have fluctuated over time. The number of customers impacted by service interruptions fluctuates as well, but not necessarily in proportion to the number or duration of service interruptions.

[39] Petition, page 6; Petition, Schedule 9.

Table 11: CenterPoint Service Interruptions[40]

Calendar Year	Number of Service Interruptions			Total Number of Customers Affected	Average Duration of Interruption in Minutes (total outage minutes/total customers affected)
	Caused by CenterPoint (A)	Caused by Factors Outside of CenterPoint's Control (B)	Total (A + B)		
2012	119	570	689	1,554	51
2013	224	317	541	1,073	62
2014	100	538	638	1,181	70
2015	135	618	753	1,745	47
2016	115	646	761	1,430	68
2017	124	486	610	1,406	49
2018	144	468	612	1,545	52
2019	157	461	618	4,356	209
2020	114	541	655	2,164	165
2021	149	520	669	2,417	154
2022	87	453	540	1,437	169

In 2022, 540 gas service interruptions affected 1,437 customers. This is down 129 interruptions (19%) and 980 customers (41%) impacted from 2021. The interruptions caused by CenterPoint decreased by 62 incidents or (42%), those outside of the Company's control decreased by 67 or (13%). While the Company dropped its outages significantly in 2022, the average duration of service interruptions increased about 10%.

Table 12 provides the Company's natural gas service interruptions classified as MNOPS reportable events.

Table 12: MNOPS Reportable Interruptions for CenterPoint[41]

Calendar Year	Number of Reportable Interruptions
2012	63
2013	66
2014	97
2015	80
2016	56
2017	89
2018	93
2019	71
2020	56
2021	63
2022	37

[40] Petition, page 6; Petition, Schedule 10.
[41] Petition, page 7.

In 2022, CenterPoint reported 37 MNOPS reportable events compared to 63 in 2021. A 41% decrease in the reportable events from 2021. According to Schedule 11 of the Report, the majority of the 2021 MNOPS reportable interruptions were caused by damaged gas mains, damaged gas services and several fires. In 2022, the Company was most often notified of reportable interruptions by 911 emergency services and excavators. CenterPoint received 26 MNOPS violations in 2022 as compared to 28 in 2021.[42]

The Department concludes the Company has met the natural gas service interruption data requirements for 2022.

L. CUSTOMER SERVICE – RELATED OPERATIONS/MAINTENANCE EXPENSES, PAYROLL TAXES AND BENEFITS

In its t G999/CI-09-409 *Order* the Commission required CenterPoint to report:

1. Customer service-related operation and maintenance (O&M) expenses accounted for under the Federal Energy Regulatory Commission (FERC) 901 and 903 accounts and;
2. payroll taxes and benefits.

The Company's Report presents these expenditures together and combines the related data into a single schedule. Table 13 summarizes CenterPoint's O&M expenses plus payroll taxes/benefits data the Company submitted.

Table 13: CenterPoint Customer Service-Related O&M Expenses Plus Payroll Taxes and Benefits[43]

Calendar Year	*Customer Service O&M Expense Plus Payroll Taxes & Benefits:* ***Total*** *in Dollars ($)*	*Customer Service O&M Expense Plus Payroll Taxes & Benefits:* ***Monthly Average*** *in Dollars ($)*
2012	$24,900,000	$2,075,000
2013	$24,860,508	$2,071,709
2014	$27,675,521	$2,306,293
2015	$34,111,598	$2,842,633
2016	$30,520,581	$2,543,382
2017	$30,178,171	$2,514,848
2018	$32,655,881	$2,721,323
2019	$30,530,325	$2,544,194
2020	$27,919,331	$2,325,611
2021	$24,508,313	$2,042,359
2022	$27,120,640	$2,260,053

CenterPoint's O&M expenses plus payroll taxes and benefits increased $2.6 million with a monthly average of $217,694 in 2022 as compared to 2021. While the expenses increased in 2022, the Company remains below its historic numbers due to a change made to corporate allocations in 2020. The change

[42] Petition, Schedule 11.
[43] Petition, page 7; Petition Schedule 13.

resulted in the benefits and payroll taxes for the Customer Service organization no longer being booked to FERC accounts 901 and 903.[44]

The Department concludes CenterPoint has met the expenditure reporting requirement for 2022.

M. STEEL SERVICE AND METER RELOCATION EXPENSES

The Commission's March 15, 2010 *Order* in Docket No. G008/M-09-1190[45] required CenterPoint to file in its annual compliance filings showing for each service line relocation and each relocation meters rated at 630 cubic feet per hour (CFH) or greater, the itemized costs associated with each relocation, to be filed with the annual service quality reports.[46]

The Department reviewed the data CenterPoint provided for 2022 and notes the costs are highly variable. In 2021, the average cost associated with steel service line relocation was $10,366, while in 2022 the average cost was $9,320. The average cost of meters operating at 630 CFH or higher was much lower than in 2021. The 2021 the average cost reported was $9,246, while the 2022 reported cost was $4,962. The Company notes the variability of costs is largely due to the unique circumstances of each job.

The Department concludes CenterPoint has met the steel service line relocation and meters operating at 630 CFH or greater requirement.

N. CALL CENTER DETAIL

In its July 7, 2006 *Order* in Docket No. G008/GR-04-901, the Commission required the Company to provide call center related information and complaints from other state agencies and the Better Business Bureau. CenterPoint provided this information in Schedule 16 of Section 6.1 and Schedule 17 of Section 6.2.

Table 14: Call Center Detail for 2022 and Comparison to 3 Year Average 2019 - 2021

Description	2019-2021 3YR Avg.	2022	% Change
Billing Inquiries	1,281,495	1,483,258	16%
Credit/Payment Arrangements	59,684	75,266	26%
Service Connection/Disconnection Requests	102,545	81,626	-20%
Emergency	66,635	74,420	12%
Business Customer Hotline	39,754	42,596	7%
Total	1,550,113	1,757,166	13%

[44] Petition, page 7.
[45] https://efiling.web.commerce.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={D37D0FCB-DFB1-4B47-A0F9-9CC6E69DAE52}&documentTitle=20103-47983-01
[46] https://efiling.web.commerce.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={D37D0FCB-DFB1-4B47-A0F9-9CC6E69DAE52}&documentTitle=20103-47983-01

The Department assumes the ending of the COVID-19 disconnection moratorium was at least partially responsible for the increase in billing calls and payment arrangements to the Company.

O. TRANSMISSION AND DISTRIBUTION SYSTEM PERFORMANCE MEASURES

The Commission's November 14, 2019 *Order* in Docket No. G008/M-19-300, required CenterPoint to report the TIMP/DIMP data addressing the 29 metrics developed in its affiliated interest docket, updating the three-year averages each year.

The following sections 1 – 4 provide additional details on the Company's reported performance measures required by the Commission's *Order* in Docket No. G008/M-18-312 and the reporting metrics developed pursuant to the Commission's *Order* in Docket No. G008/AI-18-517.

1. Transmission and Distribution Integrity Management Plan Performance Measures

CenterPoint submitted select information on its TIMP and DIMP and provided a 2019 – 2021 three-year average as baseline for data comparison. Table 15 summarizes the cause of leak incidents the Company experienced.

Table 15: CenterPoint Leak Causes

	3-Year Average for Years 2019 - 2021			**Year 2022**		
Leak Cause	*Above Ground Facility Leaks*[47]	*Main Leaks*[48]	*Service Leaks*[49]	*Above Ground Facility Leaks*	*Main Leaks*	*Service Leaks*
Corrosion	86	77	158	214	36	155
Equipment Failure	4,258	112	347	4,482	63	304
Excavation	25	140	622	12	138	597
Incorrect Operations	44	42	107	68	14	75
Natural Force Damage	79	6	47	34	7	51
Other	67	9	21	36	2	7
Other Outside Force Damage	61	19	96	57	11	75
Pipe, Weld, or Joint Failure	101	19	45	56	26	39
Total	**4,721**	**424**	**1,443**	**4,959**	**297**	**1,303**

[47] Petition Schedule 18A
[48] Petition Schedule 18B
[49] Petition Schedule 18C

The main leaks category is about 29% lower than the 2019-2021 average and the service leaks category is 10% lower. The results for the above ground facility leaks (AGFL) increased by 5% primarily due to equipment failure.

The Department identified this overall decrease in its Comments for the Company's 2019 SRSQ. In its Reply Comments, CenterPoint explained improvements in leak detection equipment have allowed the Company to cost effectively identify smaller leaks.

Table 15A provides data on the number of main and service line leaks associated with different pipeline materials.

Table 15A: CenterPoint Material Associated with Leaks

	3-Year Average for Years 2019 – 2021		**Year 2022**	
Gas Line Material	*Main Leaks*[50]	*Service Leaks*[51]	*Main Leaks*[52]	*Service Leaks*[53]
Bare Steel	75	55	18	45
Coated Steel	147	182	103	144
Not Assigned/Unknown	13	10	2	9
Plastic-PE	142	739	130	667
Plastic-PE Aldyl A	47	265	44	247
PVC	NA	1	NA	0
Copper	NA	191	NA	191
Total	**424**	**1,443**	**297**	**1,303**

Tables 15A shows (1) main leaks occur most commonly in coated steel and plastic-PE line and (2) service leaks occur most commonly in plastic-PE and plastic-PE Aldyl A lines.

Tables 15b. 15C. and 15D on the following pages show select cost data for certain Company projects and repairs during 2022.

[50] Petition, Schedule 18D.
[51] Petition, Schedule 18E.
[52] Petition, Schedule 18D.
[53] Petition, Schedule 18E.

Table 15B: 2022 Unit Cost By Project Category[54]

	3-Year Average for Years 2019 – 2021			Year 2022		
Project	*Total Cost ($)*	*Quantity (unit)*	*Unit Cost ($/unit)*	*Total Cost ($)*	*Quantity (unit)*	*Unit Cost ($/unit)*
Transmission Pipe Integrity	$12,342,631	11,008	$1,223	$46,586,219	51,266	$909
Transmission Pipeline Replacement	$35,277,015	24,067	$1,436	$22,157,784	9,764	$2,269
Remote Control Valves	0	0	NA	0	0	N/A
Bare Steel Mains	$19,305,383	141,204	$180	$39,373,638	74,889	$526
Cast Iron Mains	0	0	NA	0	0	N/A
Copper Service Lines	$1,246,427	332	$3,849	$761,375	113	$6,738
Inside Meters	$9,891,564	1,954	$5,745	$12,572,747	2,823	$4,454
Vintage Plastic Pipe	$2,071,116	513	$4,227	$3,341,995	358	$9,335

In 2022 most per-unit costs by project increased compared to the 2019-2021 three-year average.

- Transmission Pipe Integrity decreased from $1,223/ft to $909/ft or (26%).
- Transmission Pipeline Replacement increased from $1,436/ ft. to $2,269 per ft or 58%.
- Bare Steel Mains increased from $180 /ft to $526/ft or 192%.
- Replacement of Copper Service Lines increased from $3,849 per service line to $6,738 per service line or 75%
- Inside Meters decreased from $5,745/meter to $4,454/meter or (22%).
- Vintage Plastic Pipe dramatically increased from $4,227 per service line to $9,335 per service line or 121%.

[54] Data taken from Petition Schedule 18K.

Table 15C: 2022 Budget Variances Compared to 2019-2021 Three-Year Average Variances[55]

	3-Year Average for Years 2019 – 2021			Year 2022		
Project	*Forecast ($)*	*Actual ($)*	*Variance ($)*	*Forecast ($)*	*Actual ($)*	*Variance ($)*
Transmission Pipe Integrity (TIMP Capital)	$15,118,333	$14,342,154	$ (602,661)	$56,961,000	$54,145,513	$(2,815,487)
Transmission Pipeline Replacement	$33,226,667	$35,277,015	$2,050,349	$18,100,000	$22,157,784	$4,057,784
Remote Control Valves	$ 153,333	$84,486	$(68,848)	0	0	0
Bare Steel Mains	$17,145,597	$19,305,383	$2,159,786	$27,455,126	$39,373,638	$11,918,512
Cast Iron Mains	0	0	0	0	0	0
Copper Service Lines	$ 1,027,890	$ 1,246,427	$218,537	$1,027,950	$ 761,375	$(266,575)
Inside Meters	$9,663,556	$ 9,891,564	$228,007	$12,999,829	$12,572,747	$(427,082)
Vintage Plastic Pipe	$2,359,030	$ 2,071,116	$287,914)	2,367,750	$3,341,995	$974,245
Total	$78,694,406	$82,218,145	$3,985,170	$118,911,655	$132,353,052	13,441,397

The 2022 actuals for specific projects came out $13M or 11% higher than budget. The main drivers are the Transmission Pipeline Replacement project and the Bare Steel Mains projects, which were both significantly lower over the 2019-2021 three-year average.

[55] Data taken from CenterPoint's Petition, Schedule 18I.

Table 15D: 2022 Average Annual Cost to Repair Leaks Compared to 2019-2021 Three-Year Average[56]

	3-Year Average for Years 2019 - 2021			Year 2022		
Description	*Number*	*Repair Cost*	*Avg Cost*	*Number*	*Repair Cost*	*Avg Cost*
All Leak Repairs	13,869	$5,967,278	$3,943	14,110	$5,089,024	$361
All Mains	624	$1,781,504	$2,853	535	$1,283,300	$2399
All Meters	11,175	$2,369,027	$212	11,665	$2,153,936	$185
All Services	2,070	$1,816,747	$878	1910	$1,651,788	$865
Capitalized Leak Repairs	1,175	$1,703,914	$6,357	1,376	$1,595,469	$1,159
Mains (capitalized)	156	$706,707	$4,530	162	$540,792	$3,338
Meters (capitalized)	369	$249,152	$676	483	$287,245	$595
Services (capitalized)	650	$748,055	$1,151	731	$767,432	$1,050
Expensed Leak Repairs	12,694	$4,185,961	$3,079	12,734	$3,493,555	$274
Mains (expensed)	468	$997,394	$2,130	373	$742,508	$1,991
Meters (expensed)	10,806	$2,119,875	$196	11,182	$1,866,691	$167
Services (expensed)	1,420	$1,068,692	$753	1,179	$884,356	$750

When comparing the average cost of leak repairs, for the three-year average to 2022 all leak repairs declined by 15% while the average cost declined by 90%. When comparing the capitalized leak repair costs for the three-year average to 2022, costs declined by 6%, and the expensed leak repair costs declined by 16%.

Summary

The TIMP and DIMP information provided for 2022 is consistent with the data provided in prior years.

2. Transmission and Distribution Integrity Management Plan Performance Measures

CenterPoint provided information about risk levels corresponding to different causes of repairs in Schedules 18f - 18j in its Report. The Department provides Tables 16A – 16E to correspond with the Company's report. In its Comments for Docket No. G-008/M-21-303, the Department requested the Company provide context for this data in its Reply Comments. The response is below.

> "For Schedules 18(f) through 18(j), CenterPoint Energy uses a System Threat Risk Model outlined in its DIMP. This model is based on the

[56] Data taken from CenterPoint's Petition, Schedule 18m.

estimation of the risk associated with each individual leak repair record and summing the risk to account for the risk in the entire system by performing a facility-threat risk analysis. Using the consequence factors identified in the plan (leak class, volume, migration, etc.) and assuming the probability to be one for each leak repair, the risk is determined on each record for the various attributes/conditions. A lower risk factor equates to a safer system. This is a relative risk model so the results from each year can be compared to each other, however, these factors cannot be compared across utilities as this risk model was developed in house and not used across the industry. Additionally, if this calculation was adopted by other utilities it does take into account population of assets and therefore larger utilities would be seen as inherently riskier."

Table 16A: Relative Risk for Above the Ground Gas Facilities 2022 to Three-Year Average[57]

Risk by Cause for ABGF	2019 -2021 Avg.	2022	Nominal Change	Percentage Change
Corrosion	5,075	8,197	3,122	62%
Equipment	195,666	330,024	134,358	69%
Excavation	16,489	3,600	-12,889	-78%
Incorrect Operation	9,373	13,177	3,804	41%
Natural Forces	16,756	7,613	-9,143	-55%
Other	5,305	7,374	2,069	39%
Other Outside Force Damage	15,036	10,513	-4,523	-30%
Pipe, Weld or Joint Failure	6,252	753	-5499	-88%
Total	**278,736**	**381,251**	**111,299**	**41%**

[57] Data for Table 16A was taken from CenterPoint's Petition Schedule 18F.

Table 16B: Relative Risk for Mains - 2022 to Three Year Average[58]

Risk by Cause for Mains	2019 -2021 Avg.	2022	Nominal Change	Percentage Change
Corrosion	76,446	46,170	(30,276)	-39.6%
Equipment	107,180	103,140	(4,040)	-3.8%
Excavation	241,594	253,866	12,272	5.1%
Incorrect Operation	54,665	18,424	(36,241)	-66.3%
Natural Forces	7,040	9,747	2,707	38.5%
Other	7,004	1,734	(5,270)	-75.2%
Other Outside Force Damage	24,219	17,091	(7,128)	-29.4%
Pipe, Weld or Joint Failure	18,711	36,720	18,009	96.2%
Total	**536,859**	**486,892**	**(49,967)**	**-9.3%**

Table 16C: Relative Risk for Services - 2022 to Three Year Average[59]

Risk by Cause for Services	2019 -2021 Avg.	2022	Nominal Change	Percentage Change
Corrosion	201,269	236,025	34,756	17%
Equipment	335,436	376,650	41,214	12%
Excavation	1,036,332	1,104,570	68,238	7%
Incorrect Operation	122,075	87,034	(35,041)	-29%
Natural Forces	65,150	71,023	5,873	9%
Other	24,338	7,314	(17,024)	-70%
Other Outside Force Damage	122,055	113,400	(8,655)	-7%
Pipe, Weld or Joint Failure	45,594	41,310	(4,284)	-9%
Total	**1,952,249**	**2,037,326**	**85,077**	**4%**

Table 16D: Relative Risk for Mains by Material - 2022 to Three Year Average[60]

Risk by Cause for Mains by Material	2019 -2021 Avg.	2022	Nominal Change	Percentage Change
Bare Steel	69,375	25,169	(44,206)	-63.7%
Coated Steel	160,783	163,545	2,762	1.7%
Not Assigned/Unknown	8,722	4,860	(3,862)	-44.3%
Plastic – PE	230,764	226,404	(4,360)	-1.9%
Plastic-PE Aldyl A	67,215	66,914	(301)	-0.4%
Total	**536,859**	**486,892**	**(49,967)**	**-9.3%**

[58] Data for Table 16B was taken from CenterPoint's Petition Schedule 18G.
[59] Data for Table 16C was taken from CenterPoint's Petition Schedule 18H.
[60] Data for Table 16D was taken from CenterPoint's Petition Schedule 18I.

Table 16E: Relative Risk for Services by Material - 2022 to Three Year Average[61]

Risk by Cause for Services by Material	2019 -2021 Avg.	2022	Nominal Change	Percentage Change
Bare Steel	54,104	62,648	8,544	16%
Coated Steel	170,896	213,506	42,610	25%
Copper	236,791	282,133	45,342	19%
Not Assigned/Unknown	11,010	11,343	333	3%
Plastic – PE	1,145,394	1,156,795	11,401	1%
Plastic-PE Aldyl A	332,976	310,901	(22,075)	-7%
PVC	1,080	-	(1,080)	NA
Total	**1,952,251**	**2,037,326**	**85,075**	**4%**

The Department concludes CenterPoint has complied with these requirements.

3. Emergency Response Violations Cited by MNOPS

CenterPoint reported MNOPS cited the Company for 37 emergency response violations in 2022 compared to 63 in 2021, a significant decrease year-over-year.[62] The Company documented details around these citations in Schedule 11a of its Report. The incidents listed (CenterPoint referred to them as "MNOPS Reportables") were caused by various issues, such as fire, damaged service or mains, and leaks.

a) Violation Letters from MNOPS

CenterPoint provided the same information to fulfill the Emergency Response Violations reporting requirement (Schedule 11a to the Report) and to fulfill the Violation Letters Received reporting requirement. CenterPoint reported receiving 26 violation letters in 2022, which was a slight decrease from the 28 emergency response violation citations the Company received from MNOPS in 2021.[63]

The Department concludes CenterPoint has complied with this requirement.

4. Monitoring and Metrics for Excess Flow Valve (EFV) Deployment and Manual Shutoff Valves

The Company filed its information in a format consistent with recommendations in Docket No. G008/M-19-300. The Company reported during 2022 it had: (1) an estimated 224,508 as total number of installed EFVs and (2) an estimated 2,903 as total number of installed manual shutoff valves.[64] When comparing to 2021, this amounts to 17,424 installed EFVs and 696 manual shut-off valves that were installed in 2022.

[61] Data for Table 16E was taken from CenterPoint's Petition Schedule 18J.
[62] Petition, Page 7.
[63] *Id.*
[64] Petition, Page 10.

5. EFV Outreach Reports

CenterPoint explained due to COVID, the Company completed all initial contact by email. Any subsequent meetings were via telephone. CenterPoint noted it had three decision makers request an engineering analysis on seven accounts in response to the first email it sent to 736 accounts. Regarding a second email the Company sent on this topic to 508 accounts, no decision makers requested an engineering analysis. Three follow-up meetings were scheduled.[65]

6. Conclusion

The Department concludes CenterPoint met the reporting requirements pursuant to the Commission's *Order* in Docket No. G008/M-18-312 and the reporting metrics developed pursuant the Commission's *Order* in Docket No. G008/AI-18-517.

P. WEB BASED METRICS

The Department recommended additional information in the electric utilities' service reliability and service quality reports related to web-based service metrics during the 2021 reporting cycle. The Department intentionally did not recommend the same data in the 2020 gas reports, as we were being responsive to the Commission's notice in the electric SRSQ dockets. However, as part of its order in In Docket No. G-008/M-21-303, the Commission requested "the Gas Utilities propose a web-based service metrics similar to that required of electric utilities by September 1, 2022 as a supplemental filing in their 2021 gas service quality report dockets.[66]

In response to this order, on September 1, 2022, the Gas Utilities, including CenterPoint, submitted a joint compliance filing in which they outlined their proposed web-based service metrics. The Gas Utilities expect to first report on the above information in their annual service quality reports for 2023, which will be filed in 2024.

III. DEPARTMENT CONCLUSIONS AND RECOMMENDATIONS

Based upon its review, the Department recommends the Commission accept CenterPoint's 2022 Annual Natural Gas Service Quality Report.

[65] Petition, Page 11.
[66] CenterPoint Docket No. G-008/M-21-303, PUC Order

From: Suppes, Emily M
To: Skayer, Angie (COMM)
Subject: RE: [External Email] G008/M-23-79 Service Quality Report
Date: Thursday, September 14, 2023 3:46:12 PM
Attachments: image001.png
image002.png
image003.png
Schedule 5 Customer Deposits.pdf

Angie, please see our responses below. Again, thank you for your patience on this one, we had some folks out of the office which delayed our response. Please let me know if you have any follow-up questions!

- *Renewed Service Installations*

  In both 2021, and 2022 the Renewed Service Installations increased. According to the 2021 data this was due to adding additional codes fed into the report CenterPoint previously filtered out.

  Can you please let me know if any additional reporting changes were made in 2022 that would be causing an increase in the Renewed Service Installations.

  CNP Response:
  The Company previously updated the data parameter filters for the data extraction from our system to include additional job types that fall under the "renewed" service umbrella. These additional job types under "renewed" service installations included replacements, extensions, and test and connects. The changes from 2021 to 2022 do not appear to have significantly impacted the job code mapping changes to cause an increase to the Renewed Service Installations.

- *Service Installations Time to Complete*

  There is an increase in the number of days to Complete for the Service Installations. On page 3 of the Petition, it states the following:

  > Reporting process changes were made in evaluating the average days to complete the 2022 data, therefore will not be an exact comparison to 2021 data.

  Can you please let me know what reporting process changes made that are causing a variance to the Service Installation timeframe for 2022.

  CNP Response:
  The Company updated previous reporting to address internal work order status standardization for how the data is pulled for this report. The Company has two applications in managing these work orders: one is the primary application and the other is a mobile system construction crews are able to utilize when working in the field. The reporting changes that were made were to standardize the data for the window of time measured for "Time to

Complete," when able, across the two applications.

- *Customer Deposit Clarification*

  On page 3 of the Petition, it states 316 new deposits were required for service, however on Schedule 5, page 1, line #2, it states 284. This is the same information as the 2021 report. This is the only line that I noticed that seems to have remained the same from last year's Schedule 5 Service Quality Report.

  Can you please clarify which number is correct, 316 or 284.

  CNP Response:
  316 is the correct value for 2022. The attached Schedule 5 details the updated values for 2022.

Again, please let me know if you have any follow-up questions or concerns!

Thanks,
Emily

Emily Suppes, PE (she/her)
Director, Regulatory

CenterPoint Energy | Regulatory Affairs
612.321.5363 w | 612.258.8485 c
CenterPointEnergy.com

From: Skayer, Angie (COMM) <angie.skayer@state.mn.us>
Sent: Tuesday, September 5, 2023 4:17 PM
To: Suppes, Emily M <emily.suppes@centerpointenergy.com>
Subject: RE: [External Email] G008/M-23-79 Service Quality Report

Thank you, it is appreciated.

Angie

Angie Skayer
Public Utilities Financial Analyst
angie.skayer@state.mn.us
Minnesota Department of Commerce

85 7th Place East, Suite 280 | Saint Paul, MN 55101

From: Suppes, Emily M <emily.suppes@centerpointenergy.com>
Sent: Tuesday, September 5, 2023 4:16 PM
To: Skayer, Angie (COMM) <angie.skayer@state.mn.us>
Subject: FW: [External Email] G008/M-23-79 Service Quality Report

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Good Afternoon, Angie!

We are finalizing the response to your inquiries below and will respond back by the end of the week. Thank you for your patience! We had some folks out of the office on our end, but wanted to follow-up that your two emails are still on our radar!

Thanks,
Emily

Emily Suppes, PE (she/her)
Director, Regulatory

CenterPoint Energy | Regulatory Affairs
612.321.5363 w | 612.258.8485 c
CenterPointEnergy.com

From: Skayer, Angie (COMM) <angie.skayer@state.mn.us>
Sent: Saturday, August 26, 2023 4:14 PM
To: Suppes, Emily M <emily.suppes@centerpointenergy.com>

Subject: [External Email] G008/M-23-79 Service Quality Report

EXTERNAL EMAIL

CAUTION: This message originated from outside CenterPoint Energy. Do not click on links, open attachments, or enter data unless you recognize the sender, were expecting the content and know it to be safe.

Hello Ms. Suppes,

I have a couple of hopefully quick additional questions for you regarding the Service Quality Report.

- *Renewed Service Installations*

  In both 2021, and 2022 the Renewed Service Installations increased. According to the 2021 data this was due to adding additional codes fed into the report CenterPoint previously filtered out.

  Can you please let me know if any additional reporting changes were made in 2022 that would be causing an increase in the Renewed Service Installations.

- *Service Installations Time to Complete*

  There is an increase in the number of days to Complete for the Service Installations. On page 3 of the Petition, it states the following:

  > Reporting process changes were made in evaluating the average days to complete the 2022 data, therefore will not be an exact comparison to 2021 data.

  Can you please let me know what reporting process changes made that are causing a variance to the Service Installation timeframe for 2022.

- *Customer Deposit Clarification*

  On page 3 of the Petition, it states 316 new deposits were required for service, however on Schedule 5, page 1, line #2, it states 284. This is the same information as the 2021 report. This is the only line that I noticed that seems to have remained the same from last year's Schedule 5 Service Quality Report.

  Can you please clarify which number is correct, 316 or 284.

Thanks much.

Angie

Angie Skayer
Public Utilities Financial Analyst
angie.skayer@state.mn.us
Minnesota Department of Commerce
85 7th Place East, Suite 280 | Saint Paul, MN 55101

CenterPoint Energy
2022 Service Quality Report

Customer Deposits

New Service Extensions

	Jan-2022	Feb-2022	Mar-2022	Apr-2022	May-2022	Jun-2022	Jul-2022	Aug-2022	Sep-2022	Oct-2022	Nov-2022	Dec-2022	2022
# of Service Connections	9,773	8,957	12,607	13,746	14,986	17,935	17,804	20,877	19,233	18,575	14,809	11,605	180,907
# Deposits required as a condition of service	5	11	21	30	16	16	14	11	35	60	56	41	316
% of Service Connections	0.05%	0.12%	0.17%	0.22%	0.11%	0.09%	0.08%	0.05%	0.18%	0.32%	0.38%	0.35%	0.17%

3 Year Average Calculations (2018 - 2020)

% of Commercial Svc Connections Requiring a Deposit

Year 2019	0.33%
Year 2020	0.14%
Year 2021	0.18%
3 Year Avg	0.22%

Deposits Held at Year-End

Year 2019	2,042
Year 2020	1,839
Year 2021	1,587
3 Year Avg	1,823

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-23-79

Dated this **28th** day of **September 2023**

/s/Sharon Ferguson

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_23-79_M-23-79
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_23-79_M-23-79
Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.	505 Nicollet Mall 3rd Floor Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-79_M-23-79
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_23-79_M-23-79
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_23-79_M-23-79
Emily	Suppes	emily.suppes@centerpointenergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-79_M-23-79
Donald	Wynia	donald.wynia@centerpointenergy.com	CenterPoint Energy	CenterPoint Energy 505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-79_M-23-79