



505 Nicollet Mall
PO Box 59038
Minneapolis, MN 55459-0038

July 23, 2018

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

*RE: Supplemental Reply Comments of CenterPoint Energy Resources Corp., d/b/a
CenterPoint Energy Minnesota Gas (CenterPoint Energy)
2017 Annual Service Quality Report
Docket No. G-008/M-18-312*

Dear Mr. Wolf:

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas (CenterPoint Energy or the Company) submits these Supplemental Reply Comments.

As referenced in our June 25, 2018 Reply Comments, one of our stakeholders contacted us with a question regarding Schedule 3 (Minnesota Cold Weather Rule Compliance Questionnaire) and the number of Cold Weather Rule (CWR) protection requests (Line 3). Upon further research, the Company discovered this line of the report did not include all types of payment arrangements. As a result, several other lines were corrected, including: the number of payment schedule requests and negotiations mutually agreed upon (Lines 16(a) and 18), the number of accounts disconnected (Lines 21c-e and 22c-e), and the number of accounts disconnected for non-payment (Line 23).

Further research indicated we had this same issue in the following months:

- February 2016 – April 2016;
- October 2016 – April 2017; and
- October 2017 – April 2018.

For purposes of Cold Weather Rule reporting requirements, we will resubmit corrected monthly reports in cooperation with the Consumer Affairs Office.

For purposes of Service Quality reporting, we have attached revised Schedule 3 filings for 2016 and 2017.

CenterPoint Energy apologizes for any inconvenience caused by these errors. If you have any questions regarding this information, please contact me at (612) 321-4905.

Sincerely,

/s/

Shari Grams
Regulatory Analyst

cc: Service List

CenterPoint Energy
2016 Service Quality Report

REVISED Minnesota Cold Weather Rule Compliance Questionnaire
Utility Monthly Reports (216B.091)

Company: CenterPoint Energy Minnesota Gas for report period ending:

	January	February	March	April	May	June	July	August	September	October	November	December	Average
1	Number of Residential Customer Accounts:												
	772,231	772,590	772,786	772,557	771,010	770,394	769,747	769,767	771,485	774,894	777,024	778,731	772,768
2	Number of Past Due Residential Customer Accounts:												
	69,808	78,426	80,197	78,549	82,500	78,896	82,055	78,090	78,499	72,025	73,601	72,493	77,095
3	Number of Cold Weather Protection Requests:												
	9,306	20,343	23,468	25,025	0	0	0	0	0	3,003	4,225	3,148	7,377
RECONNECTION AT BEGINNING OF COLD WEATHER MONTHS													
4	Number of "Right to Appeal" notices mailed to customers:												
	6	6	6	5	0	0	0	0	0	9	9	4	4
5	<i>Intentionally Blank</i>												
6	Number of customer accounts granted reconnection request:												
	1,164	1,001	1,202	695	0	0	0	0	0	930	1,436	807	603

INABILITY TO PAY (ITP)

10% PLAN (TPP)

CenterPoint Energy
2016 Service Quality Report

REVISED Minnesota Cold Weather Rule Compliance Questionnaire
Utility Monthly Reports (216B.091)

Company: CenterPoint Energy Minnesota Gas for report period ending:

January February March April May June July August September October November December Average

PAYMENT SCHEDULE (PS)

16	Number of "Right to Appeal" notices mailed to customers:	11	11	37	0	0	0	0	0	0	0	1	1	5
a)	Number of PS requests received	8,136	19,336	22,260	24,325	0	0	0	0	0	2,064	2,780	2,337	6,770
17	<i>Intentionally Blank</i>													
18	Number of PS negotiations mutually agreed upon:	8,125	19,325	22,223	24,325	0	0	0	0	0	2,064	2,779	2,336	6,765
19	<i>Intentionally Blank</i>													

DISCONNECTIONS

20	Number of disconnection notices mailed to customers:	32,611	12,430	33,467	38,236	24,975	26,182	17,649	14,148	13,271	13,802	16,542	18,539	21,821
21	Number of customer accounts disconnected who did not seek protection:													

Duplicate columns for use in April and October

April 1-15 and October 1-15 in 1st column

All other months, use 1st column only

a)	# Electric - heat affected													
b)	# Electric - heat not affected													
c)	# Gas - heat affected	1,297	972	1,475	764	5,986	5,634	4,199	3,316	2,963	943	987	452	2,416
d)	# Gas - heat not affected	5	5	5	8	33	33	28	18	22	7	15	4	15
e)	Total # disconnected	1,302	977	1,480	772	6,019	5,667	4,227	3,334	2,985	950	1,002	456	2,431

April 16-30 and October 16-31 in 2nd column

All other months, use 1st column only

a)	# Electric - heat affected													
b)	# Electric - heat not affected													
c)	# Gas - heat affected				2,754						441			1,598
d)	# Gas - heat not affected				11						5			8
e)	Total # disconnected				2,765						446			1,606

22 Number of customer accounts disconnected seeking protection:

a)	# Electric - heat affected													
b)	# Electric - heat not affected													
c)	# Gas - heat affected	36	238	320	112	0	0	0	0	0	40	123	75	79
d)	# Gas - heat not affected	0	0	1	0	0	0	0	0	0	0	0	0	0
e)	Total # disconnected (See Note)	36	238	321	112	0	0	0	0	0	40	123	75	79

23 Number of customer accounts disconnected for nonpayment (auto-calculation of #21e+ #22e):

		1,338	1,215	1,801	3,649	6,019	5,667	4,227	3,334	2,985	1,436	1,125	531	2,777
		1,338	1,215	1,801	3,649	6,019	5,667	4,227	3,334	2,985	1,436	1,125	531	2,777

CenterPoint Energy
2016 Service Quality Report

REVISED Minnesota Cold Weather Rule Compliance Questionnaire
Utility Monthly Reports (216B.091)

Company: CenterPoint Energy Minnesota Gas for report period ending:

January February March April May June July August September October November December Average

DOLLAR VALUE

24	Total dollars past due on all residential accounts:	\$10,734,960	\$13,255,146	\$14,305,820	\$13,258,496	\$13,463,302	\$13,805,969	\$12,734,887	\$11,596,342	\$10,548,287	\$8,631,147	\$8,077,097	\$7,627,363	\$11,503,235
25	Average past due dollar amount per past due account (auto-calculation of #24 ÷ #2):	\$154	\$169	\$178	\$169	\$163	\$175	\$155	\$148	\$134	\$120	\$110	\$105	\$148
26	Total dollars received from energy assistance programs:	\$1,354,411	\$1,412,389	\$1,600,655	\$1,490,000	\$751,986	\$643,015	\$271,085	\$988	\$521	\$235	\$1,583,615	\$1,258,059	\$863,913
27	Total dollars received from other sources (private organizations):	\$30,121	\$42,963	\$14,495	\$44,866	\$47,582	\$39,779	\$44,647	\$66,486	\$64,753	\$0	\$36,741	\$26,825	\$38,272
28	Total Revenue from sales to residential accounts:	\$90,691,520	\$67,477,727	\$47,560,196	\$36,470,635	\$19,093,051	\$16,080,765	\$15,698,218	\$18,202,629	\$16,916,457	\$28,050,516	\$41,749,550	\$91,164,079	\$40,762,945
29	Average monthly residential bill: (auto-calculation of #28 ÷ #1)	\$117	\$87	\$62	\$47	\$25	\$21	\$20	\$24	\$22	\$36	\$54	\$117	\$53
30	Intentionally Blank													
30	Average annual residential bill:													
31	Total residential account write-offs due to uncollectible:	\$808,407	\$391,211	\$336,966	\$492,033	\$405,565	\$432,742	\$691,533	\$782,392	\$961,469	\$1,070,993	\$492,058	\$462,660	\$610,669

DISCONNECTION DURATION

32	Number of customer accounts disconnected 24 hours or more:													
a)	# Electric - heat affected													
b)	# Electric - heat not affected													
c)	# Gas - heat affected	1,045	892	1,451	784	0	0	0	0	0	335	869	411	482
d)	# Gas - heat not affected	4	4	6	8	0	0	0	0	0	2	14	4	4
e)	Total # disconnected	1,049	896	1,457	792	0	0	0	0	0	337	883	415	486
33	Intentionally Blank													
34	Number occupied heat-affected accounts disconnected 24 hours or more (to include customers who did and did not seek protection).	1,039	878	1,427	769	0	0	0	0	0	330	858	402	475
35	Intentionally Blank													
36	Intentionally Blank													

RECONNECTION DATA

37	# Accounts reconnected	1,234	1,036	1,225	2,597	4,301	3,910	3,301	2,815	3,017	2,589	1,554	885	2,372
38	# Accounts remaining disconnected	2,741	2,712	3,084	3,828	5,150	6,463	6,949	6,913	6,281	4,369	3,364	2,622	4,540
a)	1-30 days	154	187	584	1,115	1,931	2,187	1,433	972	749	260	294	24	824
b)	31-60 days	48	67	100	314	638	1,225	1,417	898	448	248	73	71	462
c)	61+ days	2,539	2,458	2,400	2,399	2,581	3,051	4,099	5,043	5,084	3,861	2,997	2,527	3,253

CenterPoint Energy
2017 Service Quality Report

REVISED Minnesota Cold Weather Rule Compliance Questionnaire
Utility Monthly Reports (216B.091)

Company: CenterPoint Energy Minnesota Gas for report period ending:

	January	February	March	April	May	June	July	August	September	October	November	December	Average
1	Number of Residential Customer Accounts:												
	780,097	780,514	780,589	780,374	780,074	779,619	779,539	780,073	782,150	785,182	787,208	788,832	782,021
2	Number of Past Due Residential Customer Accounts:												
	64,055	81,927	81,067	84,820	81,807	81,706	77,570	85,120	84,663	73,513	70,986	76,816	78,671
3	Number of Cold Weather Protection Requests:												
	10,029	5,300	5,006	2,217	0	0	0	0	0	3,169	4,577	3,455	2,813
RECONNECTION AT BEGINNING OF COLD WEATHER MONTHS													
4	Number of "Right to Appeal" notices mailed to customers:												
	11	6	7	2	0	0	0	0	0	17	10	7	5
5	<i>Intentionally Blank</i>												
6	Number of customer accounts granted reconnection request:												
	1,321	1,441	830	654	0	0	0	0	0	1,082	1,228	655	601

INABILITY TO PAY (ITP)

10% PLAN (TPP)

CenterPoint Energy
2017 Service Quality Report

REVISED Minnesota Cold Weather Rule Compliance Questionnaire
Utility Monthly Reports (216B.091)

Company: CenterPoint Energy Minnesota Gas for report period ending:

	January	February	March	April	May	June	July	August	September	October	November	December	Average		
PAYMENT SCHEDULE (PS)															
16	Number of "Right to Appeal" notices mailed to customers:														
	9	11	17	3	0	0	0	0	0	1	2	1	4		
a)	Number of PS requests received														
	8,697	3,853	4,169	1,561	0	0	0	0	0	2,070	3,339	2,793	2,207		
17	<i>Intentionally Blank</i>														
18	Number of PS negotiations mutually agreed upon:														
	8,688	3,842	4,152	1,558	0	0	0	0	0	2,069	3,337	2,792	2,203		
19	<i>Intentionally Blank</i>														
DISCONNECTIONS															
20	Number of disconnection notices mailed to customers:														
	31,613	10,290	30,918	32,138	33,059	27,479	20,098	15,239	6,890	18,302	16,208	29,685	22,660		
21	Number of customer accounts disconnected who did not seek protection:														
	Duplicate columns for use in April and October April 1-15 and October 1-15 in 1st column <i>All other months, use 1st column only</i>														
a)	# Electric - heat affected														
b)	# Electric - heat not affected														
c)	1,419	1,425	921	921	6,138	5,698	4,237	3,443	486	1,096	811	381	2,248		
d)	# Gas - heat not affected														
	7	10	8	11	24	30	24	18	3	4	11	4	13		
e)	Total # disconnected														
	1,426	1,435	929	932	6,162	5,728	4,261	3,461	489	1,100	822	385	2,261		
	April 16-30 and October 16-31 in 2nd column <i>All other months, use 1st column only</i>														
a)	# Electric - heat affected														
b)	# Electric - heat not affected														
c)	# Gas - heat affected														
													2,165	360	1,263
d)	# Gas - heat not affected														
													4	1	3
e)	Total # disconnected														
													2,169	361	1,265
22	Number of customer accounts disconnected seeking protection:														
a)	# Electric - heat affected														
b)	# Electric - heat not affected														
c)	# Gas - heat affected														
	274	245	216	137	0	0	0	0	0	49	164	128	101		
d)	# Gas - heat not affected														
	0	1	1	0	0	0	0	0	0	0	1	1	0		
e)	Total # disconnected (See Note)														
	274	246	217	137	0	0	0	0	0	49	165	129	101		
23	Number of customer accounts disconnected for nonpayment (auto-calculation of #21e+ #22e):														
	1,700	1,681	1,146	3,238	6,162	5,728	4,261	3,461	489	1,510	987	514	2,573		
	1,700	1,681	1,146	3,238	6,162	5,728	4,261	3,461	489	1,510	987	514	2,573		

CenterPoint Energy
2017 Service Quality Report

REVISED Minnesota Cold Weather Rule Compliance Questionnaire
Utility Monthly Reports (216B.091)

Company: CenterPoint Energy Minnesota Gas for report period ending:

January February March April May June July August September October November December Average

DOLLAR VALUE

24	Total dollars past due on all residential accounts:	\$8,238,127	\$12,536,344	\$12,790,242	\$12,891,264	\$12,283,594	\$13,116,906	\$11,915,702	\$11,284,298	\$10,587,731	\$8,430,291	\$7,566,351	\$9,334,673	\$10,914,627
25	Average past due dollar amount per past due account (auto-calculation of #24 ÷ #2):	\$129	\$153	\$158	\$152	\$150	\$161	\$154	\$133	\$125	\$115	\$107	\$122	\$138
26	Total dollars received from energy assistance programs:	\$1,700,387	\$1,172,038	\$1,295,297	\$1,121,054	\$219,696	\$377,329	\$49,240	\$550	\$0	\$17,259	\$1,121,764	\$1,302,882	\$698,125
27	Total dollars received from other sources (private organizations):	\$30,313	\$32,118	\$4,280	\$47,130	\$85,450	\$85,920	\$82,891	\$57,571	\$51,498	\$52,222	\$18,336	\$18,052	\$47,148
28	Total Revenue from sales to residential accounts:	\$102,378,244	\$64,983,831	\$66,600,476	\$34,225,754	\$25,609,899	\$17,922,117	\$15,638,649	\$18,255,976	\$16,953,736	\$36,669,299	\$64,274,469	\$92,345,001	\$46,321,454
29	Average monthly residential bill: (auto-calculation of #28 ÷ #1)	\$131	\$83	\$85	\$44	\$33	\$23	\$20	\$23	\$22	\$47	\$82	\$117	\$59
30	Intentionally Blank													
30	Average annual residential bill:													
31	Total residential account write-offs due to uncollectible:	\$321,393	\$219,053	\$271,721	\$382,876	\$425,742	\$434,792	\$606,719	\$808,002	\$998,206	\$634,164	\$685,261	\$470,826	\$521,563

DISCONNECTION DURATION

32	Number of customer accounts disconnected 24 hours or more:													
a)	# Electric - heat affected													
b)	# Electric - heat not affected													
c)	# Gas - heat affected	1,312	1,345	990	961	0	0	0	0	0	347	760	417	511
d)	# Gas - heat not affected	6	11	6	11	0	0	0	0	0	9	3	3	4
e)	Total # disconnected	1,318	1,356	996	972	0	0	0	0	0	347	769	420	515
33	Intentionally Blank													
34	Number occupied heat-affected accounts disconnected 24 hours or more (to include customers who did and did not seek protection):	1,302	1,322	976	951	0	0	0	0	0	344	744	412	504
35	Intentionally Blank													
36	Intentionally Blank													

RECONNECTION DATA

37	# Accounts reconnected	1,349	1,467	848	2,376	4,397	4,292	3,198	3,023	889	2,691	1,301	711	2,212
38	# Accounts remaining disconnected	2,717	2,694	2,819	3,399	4,824	5,839	6,468	6,394	5,623	3,800	2,986	2,512	4,173
a)	1-30 days	280	312	370	840	1,771	1,740	1,439	898	198	255	229	43	698
b)	31-60 days	15	65	162	208	603	1,152	1,264	884	558	33	83	62	424
c)	61+ days	2,422	2,317	2,287	2,351	2,450	2,947	3,765	4,612	4,867	3,512	2,674	2,407	3,051

AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

Shari Grams, being first duly sworn on oath, deposes and says she served the attached Compliance Filing by CenterPoint Energy to all persons at the addresses indicated on the attached list by having the document delivered by electronic filing or by placing in the U.S. Mail at the City of Minneapolis, Minnesota.

/s/ _____
Shari Grams
CenterPoint Energy

Subscribed and sworn to before me
this 23rd day of July, 2018.

/s/ Mary Jo Schuh _____
Notary Public
My Commission Expires on January 31, 2020.

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_18-312_M-18-312
James J.	Bertrand	james.bertrand@stinson.com	Stinson Leonard Street LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-312_M-18-312
Brenda A.	Bjorklund	brenda.bjorklund@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-312_M-18-312
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-312_M-18-312
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_18-312_M-18-312
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_18-312_M-18-312
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_18-312_M-18-312
Shari	Grams	shari.grams@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-312_M-18-312
Robert	Harding	robert.harding@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-312_M-18-312
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_18-312_M-18-312

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_18-312_M-18-312
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-312_M-18-312
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_18-312_M-18-312
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_18-312_M-18-312
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-312_M-18-312
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-312_M-18-312
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_18-312_M-18-312
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_18-312_M-18-312