

September 23, 2025

Sasha Bergman  
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  
Docket No. G008/M-25-33

Dear Ms. Bergman:

Attached are the comments of the Minnesota Department of Commerce (Department) in the following matter:

*The 2024 Annual Gas Service Quality Report (Report) submitted by CenterPoint Energy Resources Corp d/b/a CenterPoint Energy Minnesota Gas (CenterPoint or the Company).*

The Petition was filed by CenterPoint Energy Minnesota Gas on May 1, 2025

The Department recommends that the Minnesota Public Utilities Commission (Commission) accept the Company's 2024 Report and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB  
Assistant Commissioner of Regulatory Analysis

DD/ad  
Attachment

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## Acronyms, Abbreviations and Definitions

### Acronyms and Abbreviations

CAO	Consumer Affairs Office of the Minnesota Public Utilities Commission
COVID	Coronavirus Disease
CWR	Cold Weather Rule
GMG	Greater Minnesota Gas
IVR	Interactive Voice Response
MERC	Minnesota Energy Resources
MNOPS	Minnesota Operations
PHMSA	Pipeline and Hazardous Materials Safety Administration
Plastic PE	Natural Gas – Polyethylene Pipe
SRSQ	Service Quality Report

### Definitions



**Before the Minnesota Public Utilities Commission**  
**Comments of the Minnesota Department of Commerce**

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Docket No. G008/M-25-33

**I. INTRODUCTION**

CenterPoint Energy Resources Corp d/b/a CenterPoint Energy Minnesota Gas (CenterPoint or the Company) filed its 2024 annual gas service quality report (Report) on May 1, 2025. The Report covers the issues established in previous Minnesota Public Utilities Commission (Commission) Orders, including, but not limited to, call center response times, meter reading performance, involuntary disconnections, extension requests, customer deposits, customer complaints, gas emergency response times, excavation damages, and service interruptions.

The Department has reviewed the Company’s Report and provides analysis below.

**II. PROCEDURAL BACKGROUND**

- |                   |   |
|-------------------|---|
| April 16, 2009    | The Commission opened an investigation into natural gas service quality standards and requested comments from the Minnesota Department of Commerce (Department) and all Minnesota regulated natural gas utilities in Docket No. G999/CI-09-409. <sup>1</sup>  |
| August 26, 2010   | The Commission required CenterPoint to begin submitting annual service quality reports (Reports) in May 2011. Subsequent orders revised and updated the reporting requirements. <sup>2</sup>  |
| November 18, 2022 | The Commission established a Natural Gas Service Quality Working Group (NGWG) in Docket No. G002, G022, G004, G011, G008/CI-22-548 (Docket 22-548) to develop and refine future reporting requirements for natural gas utilities. <sup>3</sup> The <a href="#">Order</a> in this docket adopted the NGWG’s recommendations and authorized the Executive Secretary to establish a comprehensive list of current gas service quality reporting requirements which all gas utilities shall work from |

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<sup>1</sup> *In the matter of a Commission Investigation into Gas Utility Service Quality Standards, Notice of Comment Period*, April 16, 2009, Docket No. G999/CI-09-409, (eDockets) [20094-36334-01](#).

<sup>2</sup> *In the Matter of a Commission Investigation into Gas Utility Standards, Order Setting Reporting Requirements*, August 26, 2010, Docket No. G999/CI-09-409, (eDockets) [20108-53874-01](#), hereafter “09-409 Order”), at Order Point 2.

<sup>3</sup> *Notice of Comment and Workgroup in the Matter of an Exploration of Comparative Performance Metrics and Improvements to Natural Gas Service Quality Reports*, November 18, 2022, Docket Nos. G002, G022, G004, G011, G008/CI-22-548, (eDockets) [202211-190735-01](#).

in future reporting. This list was documented in the February 2, 2024 [Notice of Gas Service Quality Reporting Requirements](#).<sup>4</sup>

May 1, 2025 CenterPoint filed its 2024 annual service quality report in the current docket.<sup>5</sup>

Topic(s) open for comment:

- Notice Topic 1: Should the Commission accept Xcel Energy, Great Plains, CenterPoint Energy, Minnesota Energy Resources, and Greater Minnesota Gas' 2024 Annual Gas Service Quality Reports?
- Notice Topic 2: Are there other issues or concerns related to this matter?

### III. DEPARTMENT ANALYSIS

The Department reviewed the CenterPoint's 2024 Report to assess compliance with the updated reporting requirements established by the Commission in Docket 22-548. The Department used information from past annual reports to facilitate identification of issues and trends regarding CenterPoint's performance.

The Department provides responses to the Commission's questions and a summary of the Department's review of CenterPoint's 2024 Report.

#### A. RESPONSE TO COMMISSION QUESTIONS

##### A.1. *Should the Commission accept CenterPoint's 2024 Annual Gas Service Quality Report?*

The Department's review of the Company's 2024 Report concluded that CenterPoint complied with information on all Commission reporting requirements, as discussed in the following sections. Thus, the Department recommends the Commission accept the Company's 2024 Report.

##### A.2. *Are there other issues or concerns relating to this matter?*

The Department did not identify any other issues or concerns as part of its review.

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<sup>4</sup> *Notice of Gas Service Quality Reporting Requirements in the Matter of an Exploration of Comparative Performance Metrics and Improvements to Natural Gas Service Quality Reports*, February 2, 2024, Docket Nos. G002, G022, G004, G011. G008/CI-22-548, (eDockets) [20242-203037-01](#) (hereafter "22-548 Notice of February 2, 2024").

<sup>5</sup> CenterPoint, Petition and Attachment B, May 1, 2025, Docket No. G008/M-25-33, (eDockets) [20255-218489-01](#) and [20255-218489-02](#) (hereafter "CenterPoint Petition").

*B. REPORT ANALYSIS*

*B.1. PHMSA Gas Distribution Reports*

The Commission issued its Notice of “Gas Service Quality Reporting Requirements” on May 12, 2025, in Docket Number G008/M-25-33.<sup>6</sup> That document included the following language regarding this topic:

All Gas Utilities shall append their annual PHMSA<sup>7</sup> Gas Distribution Reports to their Gas Service Quality Reports.

CenterPoint included that information in Attachment A to the Report. Hence, the Department concludes the Company has complied with this reporting requirement for 2024.

*B.2. Call Center Response Time*

The Notice of “Gas Service Quality Reporting Requirements” issued on February 2, 2024, included the following language regarding this topic.<sup>8</sup>

All Gas Utilities, excluding GMG, shall report:

- The percent of calls answered within 20 seconds.<sup>9</sup>  
All Gas Utilities shall report:<sup>10</sup>
- The average time required to answer an incoming call.  
CenterPoint shall continue reporting interactive voice response (IVR) “zero-out data.”<sup>11</sup>

CenterPoint provided call center response information required for 2024 in Schedule 1 of the Report. Tables 1 and 2 summarize CenterPoint’s call center response information for the years 2013 through 2024. Table 1 provides the historical call response times excluding IVR calls. Table 2 includes the historical call response times including IVR calls.<sup>12</sup>

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<sup>6</sup> *In the Matter of CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas’ 2024 annual Gas Service Quality Report, Notice of Comment Period*, May 12, 2025, Docket No. G008/M-25-33, (eDockets) [20255-218822-01](#) (hereafter “25-33 Notice”).

<sup>7</sup> PHMSA stands for Pipeline and Hazardous Materials Safety Administration.

<sup>8</sup> 22-548 Notice of February 2, 2024, at 3.

<sup>9</sup> 09-409 Order, at Order Point 2.

<sup>10</sup> *In the Matter of the Annual Service Quality Report for Various Gas Utilities, Order Accepting Reports and Setting Further Requirements*, March 6, 2012, Docket Nos. G002/M-11-360, G001/M-11-361, G004/M-11-363, G007, 011/M- 10-372, G008/M-10-378, and G022/M-11-356 (eDockets) [20123-72274-06](#).

<sup>11</sup> *In the Matter of the 2014 Annual Gas Service Quality Report submitted by CenterPoint Energy Resources Corporation d/b/a CenterPoint Energy Minnesota Gas*, November 25, 2015, Docket No. G008/M-15-414 (eDockets) [201511-115952-01](#).

<sup>12</sup> IVR calls are automated. Customers do not 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.

The Department also included the calculation of a ten-year average and percentage change calculation comparing the Company’s 2024 results to both the ten-year average and the 2023 results. The intent of the inclusion of these two estimates was to provide both a long-term and short-term perspectives on how the different metrics are changing.

Starting with Table 1, CenterPoint’s 2024 results for the non-IVR category were an improvement compared to both the ten-year average and the Company’s 2023 results for the percentage of calls answered in 20 seconds or less. The Company’s 2024 results (83%) were 4% above the ten-year average and 1% above the Company’s 2023 results. CenterPoint’s 2024 results for the average number of seconds before a call was answered metric was 23 seconds. This statistic is 11% less than the 25 second call answer time for the ten-year average and 1% more than the 22 second call answer time for the 2023 results. The total number of calls metric was 690,290 calls in 2024. This result was 14% below the ten-year average and 13% below the 2023 results.

Table 1: CenterPoint Call Center Response Times, Excluding Calls Answered by the IVR System<sup>13</sup>

<i>Calendar Year</i>	<i>Average Percentage (%) of Calls Answered in 20 Seconds or less</i>	<i>Average Number of Seconds Before Calls Were Answered</i>	<i>Total Number of Calls Answered</i>
2013	81%	25	854,898
2014	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	81%	20	625,389
2022	81%	31	776,647
2023	82%	22	797,816
<b>10 Yr. Avg.</b>	<b>80%</b>	<b>25</b>	<b>804,780</b>
<b>2024</b>	<b>83%</b>	<b>23</b>	<b>690,290</b>
<b>% Chg. 2024 To 10 Yr. Avg.</b>	<b>4%</b>	<b>-11%</b>	<b>-14%</b>
<b>% 2024 Chg. To 2023</b>	<b>1%</b>	<b>1%</b>	<b>-13%</b>

As shown in Table 2, CenterPoint recorded an 93% response rate for calls answered in 20 seconds or less when including IVR calls in 2024. This result was a slightly above the ten-year average (3%) and slightly above the 2023 results (2%). The average number of seconds before calls were answered demonstrated better results, the 2023 results were 25% below the ten-year average and the 3% above the 2023 results. The total number of calls answered including IVR calls in 2024 decreased compared to 2023 (-10%) and was close to the ten-year average.

<sup>13</sup> CenterPoint Petition, petition page 1 and schedule 1.

Table 2: CenterPoint Call Center Response Times, Including Calls Answered by IVR System<sup>14</sup>

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
2013	88%	16	1,330,798
2014	80%	28	1,606,827
2015	90%	13	1,750,366
2016	91%	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	90%	13	1,757,166
2023	91%	9	1,829,154
<b>10 Yr. Avg.</b>	<b>90%</b>	<b>12</b>	<b>1,657,354</b>
<b>2024</b>	<b>93%</b>	<b>9</b>	<b>1,647,499</b>
<b>% Chg. 2024 To 10 Yr. Avg.</b>	<b>3%</b>	<b>-25%</b>	<b>-1%</b>
<b>% Chg. 2024 To 2023</b>	<b>2%</b>	<b>3%</b>	<b>-10%</b>

While the volume of calls including IVR calls hit a ten-year high in 2023, the volume dropped back down to that of previous years in 2024. When excluding IVR calls, the 2024 call volume also dropped to that of pre-pandemic levels.

The Department concludes CenterPoint met the Call Center Response Time reporting requirements in 2024.

*B.3. Meter Reading Performance*

The Notice of “Gas Service Quality Reporting Requirements” included the following language regarding this topic.<sup>15</sup>

All Gas Utilities shall report, as described in *Minn. Rules, part 7826.1400*;

- The number and percentage of customer meters read by utility personnel;
- The number and percentage of customer meters self-read by customers;
- The number and percentage of customer meters that have not been

<sup>14</sup> CenterPoint Petition, page 1 and schedule 1.

<sup>15</sup> 22-548 Notice of February 2, 2024, at 3.

read by utility personnel for periods of six to 12 months and for periods longer than 12 months, and an explanation as to why they have not been read; and

- Data on monthly meter reading staffing levels, by work center and geographical area.

Additionally, utilities will explain whether the difference between the total percentage of meters (100%) and the percentage of meters read (by both the utility and customers) is equal to the percentage of estimated meter reads.

The Company provided the required information for 2024. Table 3 summarizes CenterPoint Energy’s meter reading performance for the years 2013 through 2024.

Table 3: CenterPoint Meter Reading Performance<sup>16</sup>

Calendar Year	Avg # of 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
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	26	6	7
2021	896,849	100	<0.0001	25	23	6	7
2022	912,897	99.19	<0.0001	46	9	5	7
2023	921,168	99.4	<.00003	10	9	6	9
<b>10 Yr. Avg.</b>	<b>876,734</b>	<b>98.9</b>	<b>0.00001</b>	<b>82</b>	<b>42</b>	<b>6</b>	<b>9</b>
<b>2024</b>	<b>933,228</b>	<b>99.31</b>	<b>&lt;.00002</b>	<b>16</b>	<b>3</b>	<b>6</b>	<b>9</b>
<b>% Chg. 2024 to 10 Yr. Avg.</b>	<b>6%</b>	<b>0%</b>	<b>NA<sup>17</sup></b>	<b>-81%</b>	<b>-94%</b>	<b>-3%</b>	<b>-4%</b>
<b>% Chg. 2024 to 2023</b>	<b>2%</b>	<b>0%</b>	<b>NA</b>	<b>-66%</b>	<b>-71%</b>	<b>20%</b>	<b>29%</b>

CenterPoint’s meter reading results were positive in 2024. The number of active meters increased, the percentage of meters read by the Company remained constant at over 99% and the number of customer-read meters continued to decline. The average number of meters not read annually

<sup>16</sup> CenterPoint Petition, Schedule 2.

<sup>17</sup> The percentage values calculated are not representative given the very small number of customer-read meters.

between 6 and 12 months was below both the ten-year average (-81%) and the 2023 results (-66%). The average number of meters not read annually for more than 12 months was lower than the ten-year average (-94%) and the 2023 figure (-71%). The very low number of meters in this reporting category (9 in 2023 and 3 in 2024) suggest this was not a significant issue.

CenterPoint maintained the same level of Minnesota-based meter reading staff in 2024 compared to 2023 levels and this staffing level is consistent with the ten-year average.

In its petition, CenterPoint made the following statement to explain whether the difference between the total percentage of meters and the percentage of meters read (by both the utility and customers) is equal to the percentage of estimated meter reads:

The difference between the total percentage of meters and the percentage of meters read by the utility or its customers is the number of billings with estimates. This includes, but is not limited to, estimated meter readings, billing adjustments, and rebilling.

The Department concludes CenterPoint met the Commission's meter reading reporting requirements in 2024.

#### *B.4. Involuntary Service Disconnection Data*

The Notice of "Gas Service Quality Reporting Requirements" included the following language regarding this topic.<sup>18</sup>

All Gas Utilities shall append their December Residential Customer Status Reports, including data for January through December as filed in Docket No. E, G-999/PR-YY-02, in their annual service quality reports. Gas Utilities shall also provide a narrative explanation of their involuntary service disconnection performance, as needed, including steps taken to improve performance in the future.

CenterPoint provided the required residential customer status reports in Schedules 3a through 3g in its May 1, 2025 Petition.<sup>19</sup>

Table 4 below provides a summary of the Company's involuntary service disconnection data from 2013 through 2024.

CenterPoint's 2024 results for involuntary service disconnections were not particularly good from an historical perspective but showed some improvement from an annual perspective. One driver for those results was the end of the moratorium on gas and electric disconnections that was in force during the Peacetime Emergency associated with the COVID-19 pandemic. During the disconnection moratorium many customers were experiencing financial difficulties. As a result, the Company's

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<sup>18</sup> 22-548 Notice of February 2, 2024, at 4.

<sup>19</sup> CenterPoint Petition, schedules 3a through 3g.

customer arrearages balance increased, but the Company was unable to manage that increase through disconnections due to the moratorium. The moratorium ended on August 2, 2021, allowing utilities to resume normal billing practices under Minn. Stat. §§ 216B.096, 216B.0975, 216B.0976, 216B.098.<sup>20</sup> CenterPoint resumed its disconnection processes, and the number of notices sent to customers increased from 30,166 in 2021 to 196,375 in 2022 (551% increase). The number of customers disconnected also increased from 6,200 in 2021 to 19,913 in 2022 (221% increase).

Table 4: CenterPoint Involuntary Service Disconnections<sup>21</sup>

Year	# of Disconnection	# of CWR Requests	% of CWR Granted	# of Involuntary	% of Inv. Disconnects
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	32,400	96%	24,567	85%
2020	79,808	23,286	97%	2,640	14%
2021	30,166	41,398	81%	6,200	14%
2022	196,375	64,236	92%	19,913	15%
2023	285,149	74,837	80%	28,136	40%
<b>10-Yr Avg.</b>	<b>228,848</b>	<b>49,092</b>	<b>94%</b>	<b>22,999</b>	<b>58%</b>
<b>2024</b>	<b>283,416</b>	<b>50,068</b>	<b>83%</b>	<b>27,036</b>	<b>38%</b>
<b>% Chg. 2024 to 10-yr Avg</b>	<b>24%</b>	<b>2%</b>	<b>-11%</b>	<b>18%</b>	<b>-35%</b>
<b>% Chg. 2024 to 2023</b>	<b>-1%</b>	<b>-33%</b>	<b>4%</b>	<b>-4%</b>	<b>-6%</b>

The aberrations in the 2020, 2021 and 2022 data leads to some misleading results when comparing the ten-year average and 2024 results. The number of disconnection notices CenterPoint issued in 2024 was 24% higher than the ten-year average, but 1% lower than the 2023 results. If one calculates a pre-COVID average for this metric (2013-2019) the average number of disconnection notices sent is 286,214. Compared to that result, the 2024 number of disconnection notice sent is within the range of the pre-COVID average. Table 5 below contains this comparison.

<sup>20</sup> The residential protection statutes are as follows: Cold Weather Rule, Minn. Stat. § 216.096; Disconnection During Extreme Heat Conditions, Minn. Stat. § 216B.0975; Notice of Utility Disconnection, Minn. Stat. § 216B.0976; and Minn. Stat. § 216B.098. <https://www.revisor.mn.gov/statutes/cite/216B.0975> <https://www.revisor.mn.gov/statutes/cite/216B.098>

<sup>21</sup> CenterPoint Petition page 2 and schedule 3a -3g.

The 2024 figure for the percentage of CWR requests compared to the ten-year and seven-year averages are 2% higher and 1% higher. The percentage of CWR requests granted in 2024 are 11% and 15% lower respectively to the ten and seven-year averages. The annual number of involuntary disconnections in 2024 was 18% above the ten-year average, but 7% lower than the seven-year average. This result suggests the number of involuntary disconnections metric is returning to pre-covid levels. The percentage of involuntary disconnections in 2024 were 35% and 54% lower than the ten and seven-year averages. The Department will monitor these results.

Table 5: CenterPoint Involuntary Service Disconnection 2024 to Average of 2014-2019

Year	# of Disconnection Notices Mailed	# of CWR Requests	% of CWR Granted	# of Involuntary Disconnections	% of Inv. Disconnects Restored < 24 hrs.
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	32,400	96%	24,567	85%
<b>7-Yr Avg.</b>	<b>286,214</b>	<b>49,654</b>	<b>97%</b>	<b>29,064</b>	<b>83%</b>
<b>2024</b>	<b>283,416</b>	<b>50,068</b>	<b>83%</b>	<b>27,036</b>	<b>38%</b>
<b>% Chg. 2024 to 7-yr Avg</b>	<b>-1%</b>	<b>1%</b>	<b>-15%</b>	<b>-7%</b>	<b>-54%</b>

The Department concludes the Company has met the involuntary service disconnection reporting requirements for 2024.

*B.5. Service Extension Requests*

The Notice of “Gas Service Quality Reporting Requirements” included the following language regarding this topic.<sup>22</sup>

All Gas Utilities except GMG shall report, as described by *Minn. Rules, part 7826.1600, items A and B*:

- The number of customers requesting a service extension by customer class.
  - The interval between the date service was installed and the latter of

<sup>22</sup> 22-548 Notice of February 2, 2024, at 4.

the customer-requested in-service date or the date the premises were ready for service.

- The number of customers requesting service at a location previously served by the utility.
  - The interval between the date service was installed and the latter of the customer-requested in-service date or the date the premises were ready for service.

Additionally, these same utilities shall report:

- The types of extension requests, such as requests for reconnection after disconnection for nonpayment, for both locations previously serviced and not previously served.

Table 6 shows the service extension request data the Company submitted for the years 2013 - 2024.

Table 6: CenterPoint Service Extension Requests from New Service Locations<sup>23</sup>

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
2013	4,432	8	370	9
2014	4,670	8	496	8
2015	4,786	9	541	8
2016	5,276	8	462	8
2017	5,803	8	467	8
2018	5,643	8	483	9
2019	5,459	8	524	8
2020	5,681	15	425	26
2021	7,906	17	665	27
2022	6,824	22	668	38
2023	5,478	17	571	26
<b>10-Yr Avg.</b>	<b>5,723</b>	<b>12</b>	<b>530</b>	<b>17</b>
<b>2024</b>	<b>6,167</b>	<b>15</b>	<b>468</b>	<b>18</b>
<b>% Chg. 2024 to 10 Yr. Avg.</b>	<b>7%</b>	<b>28%</b>	<b>-12%</b>	<b>8%</b>
<b>% Chg. 2024 to 2023</b>	<b>13%</b>	<b>-12%</b>	<b>-18%</b>	<b>-31%</b>

<sup>23</sup> CenterPoint Petition, at 2 and schedule 4.

The 2024 results in Table 6 suggest a move towards more historically consistent results after the dislocations caused by the Pandemic. The number of Residential and Commercial new customers requesting service increased by 7% and decreased by 12% compared to the ten-year average respectively. The average number of days to complete installation for both customer classes in 2024 were somewhat higher the ten-year averages but lower than the 2023 results.

Table 7: CenterPoint Service Extension Requests from Previously Served Locations<sup>24</sup>

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
2013	419	9	32	7
2014	546	9	50	7
2015	591	9	69	9
2016	559	9	63	8
2017	564	9	51	8
2018	525	9	32	7
2019	476	9	49	9
2020	364	21	32	21
2021	10,546	24	1,170	23
2022	19,667	7	1,524	8
2023	11,783	2	1,226	4
<b>10-Yr Avg.</b>	<b>4,562</b>	<b>11</b>	<b>427</b>	<b>10</b>
<b>2024</b>	<b>12,436</b>	<b>1</b>	<b>1,206</b>	<b>5</b>
<b>% Chg. 2024 to 10 Yr. Avg.</b>	<b>173%</b>	<b>-91%</b>	<b>183%</b>	<b>-52%</b>
<b>% Chg. 2024 to 2023</b>	<b>6%</b>	<b>-50%</b>	<b>-2%</b>	<b>25%</b>

The number of requests for service at previously served locations in 2024 demonstrated similar results to 2023. The number of Residential requests was 173% above the 10-year average. The same metric for the Commercial class saw an 183% increase.

The average number of days to complete installations for existing service locations, for the residential and commercial customers decreased by 91% and 52% respectively in 2024 compared to the 10-year average.

<sup>24</sup> CenterPoint Petition, page 2 and schedule 4.

After reviewing these figures in Docket G008/M-24-33, the Department sent an information request about why the annual figures for the number of service installations at previously served locations increased so significantly in 2021, 2022 and 2023.

CenterPoint replied:<sup>25</sup>

The annual service installation figures for residential and commercial customer classes on Schedule 4 increased in 2021, 2022 and 2023 due to a change in reporting effective 2021.

Schedule 4 [in Docket G008/M-24-33] notes "\*2021 through 2023 information includes additional installation codes that were omitted in previous reports".

To provide detail on the asterisk note: in 2020 and previous years the reporting on service installation figures was a manual process, starting in 2021 a new team took on the reporting for service installations. As the team reviewed the manual process and developed the new reporting methodology, additional installation codes were identified and included in the values on the report. These installation codes are referred to as order types or service installations and were not previously identified in the manual process.

The Company's response<sup>26</sup> explains the significant increases the Department noted. The Department concludes the Company has met the Commission's service extension request reporting requirements for 2024.

#### *B.6. Customer Deposits*

Minn. R. 7826.1900 is applicable to regulated electric utilities. The Commission required each natural gas utility to provide data on the number of customers required to make a deposit as a condition of receiving service for several years.

The Commission issued its Notice of "Gas Service Quality Reporting Requirements" on May 12, 2025, in Docket No. G008/M-25-33.<sup>27</sup> That document included the following language regarding this topic:

All Gas Utilities shall report on customer deposits within their annual service quality reports whenever their deposit collection policies change. These reports shall include:

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<sup>25</sup> CenterPoint, *Response to Department Information Request No. 7*, September 23, 2024, Docket No. G008/M-24-33. (eDockets) [20249-210428-01](#).

<sup>26</sup> CenterPoint, *Response to Department Information Request No. 7*, September 23, 2024, Docket No. G008/M-24-33. (eDockets) [20249-210428-01](#).

<sup>27</sup> 25-33 Notice.

- a description of the previous deposit collection policy;
- a description of the new deposit collection policy;
- the reason for the policy change; and
- data from the previous three years regarding the number of customers who were required to make a deposit as a condition of receiving service including the total number of deposits held at the end of each year.

The Company noted at page 3 of the Report: “The Company has not had any changes to the customer deposit collection in 2024 and therefore does not meet the requirement for [reporting] customer deposit data as discussed above.”

The Department concludes the Company has met the Commission’s customer deposit reporting requirements for 2024.

#### *B.7. Customer Complaints*

The Notice of “Gas Service Quality Reporting Requirements” included the following language regarding this topic.<sup>28</sup>

All Gas Utilities except GMG shall report, as described by Minn. R. part 7826.2000:

- The number of complaints received.
- The number and percentage of complaints alleging:
  - Billing errors
  - Inaccurate metering
  - Wrongful disconnection
  - High bills
  - Inadequate service
  - Involving service extension intervals
  - Service-restoration intervals
  - Any other identifiable subject matter involved in five percent or more of customer complaints
- The number and percentage of complaints resolved upon initial inquiry, within ten days, and longer than 10 days.
- The number and percentage of all complaints resolved by taking any of the following actions:
  - Taking the actions the customer requested
  - Taking an action, the customer and the utility agree is an acceptable compromise
  - Providing the customer with information that demonstrates

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<sup>28</sup> 25-33 Notice.

- that the situation complained of is not reasonably with the control of the utility
- Refusing to take the action the customer requested
- The number of complaints forwarded to the utility by the Commission's Consumer Affairs Office for further investigation and action.

All Gas Utilities must include customer complaint data from Minn. R. 7820.0500<sup>29</sup> in their Annual Service Quality Reports.

Table 8 summarizes select customer complaint data for the years 2013 – 2024. The table provides a long-term view of CenterPoint's customer complaint categories by comparing the 2024 results to a ten-year average. For example, the number of complaints received in 2024 was 37% below the ten-year average, but 23% below than the number of complaints lodged in 2023. This same longer-term perspective applied to the Minnesota Public Utilities Commission's Office of Consumer Affairs (CAO) presents a different result. The number of complaints the CAO forwarded to the Company was 147% above the ten-year average and 12% below the number provided in 2023. From that same perspective, the percentage of complaints resolved upon initial inquiry was 6% above the ten-year average and increased approximately 0% between 2023 and 2024.

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<sup>29</sup> [Minn. R. 7820.0500](#).

Table 8: Customer Complaints for CenterPoint 2013 - 2024<sup>30</sup>

Calendar Year	Number of Complaints Received	Number of Complaints Forwarded from the Consumer Affairs Office	Percentage (%) of Complaints Resolved Upon Initial Inquiry
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	74
2021	2,330	41	67
2022	3,597	162	74
2023	4,416	335	81
<b>10-Yr Avg.</b>	<b>5422</b>	<b>119</b>	<b>77</b>
<b>2024</b>	<b>3,396</b>	<b>295</b>	<b>81</b>
<b>% Chg. 2024 to 10 Yr. Avg.</b>	<b>-37%</b>	<b>147%</b>	<b>6%</b>
<b>% Chg. 2024 to 2023</b>	<b>-23%</b>	<b>-12%</b>	<b>0%</b>

Table 9 provides details on the Company’s resolution of its customer complaints for the years 2013 - 2024. 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.

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<sup>30</sup> CenterPoint Petition, at 3-6 and schedules 6c, 6d, and 6e.

Table 9: CenterPoint Residential Customer Complaints by Resolution Method 2013 -2024 <sup>31</sup>

Cal. 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
2013	35	14	41	11	0
2014	32	15	45	7	0
2015	28	16	49	7	0
2016	25	13	56	5	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	8	69	3	7
2023	14	8	67	4	6
<b>10-Yr Avg.</b>	<b>22</b>	<b>13</b>	<b>56</b>	<b>6</b>	<b>2</b>
<b>2024</b>	<b>15</b>	<b>14</b>	<b>66</b>	<b>5</b>	<b>0</b>
<b>% Chg. 2024 – 10 Yr Avg</b>	<b>-32%</b>	<b>13%</b>	<b>18%</b>	<b>-21%</b>	<b>-100%</b>
<b>% Chg. 2024 - 2023</b>	<b>5%</b>	<b>77%</b>	<b>-1%</b>	<b>5%</b>	<b>-100%</b>

While the Department is concerned with the decrease in 10-year average percentage for agreement with customers, the Department notes a modest increase in the one-year change for this means of complaint resolution. Also, it is notable that there has been a one-year improvement in complaint resolution by compromise with the customer and a long-term improvement of complaint resolution by demonstration that circumstances are out of Company control. The Company’s efforts to manage arrearages may be the driver for the decrease in agreements and compromises with customers. The Department will monitor this topic in the Company’s future Reports.

The Department concludes the Company has met the Commission’s reporting requirements for Customer Complaints for 2024.

<sup>31</sup> CenterPoint Petition, at 5 and schedule 6d.

*B.8. Gas Emergency Phone Line Answer Time*

The Notice of “Gas Service Quality Reporting Requirements” requires the following information on this topic.<sup>32</sup>

All Gas Utilities except GMG shall report:

- Telephone answer times to the utility’s gas emergency phone line.

Table 10 shows the details relevant to emergency phone calls CenterPoint received for the years 2013 - 2024.

Table 10: Gas Emergency Phone Calls CenterPoint Received 2013 - 2024<sup>33</sup>

<b>Calendar Year</b>	<b>Number of Gas Emergency Calls</b>	<b>Average Number of Seconds Before Calls were Answered</b>	<b>Percentage (%) of Calls Answered in 20 Seconds or Less</b>
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	15	88
2020	54,824	9	91
2021	66,005	14	89
2022	74,420	9	92
2023	79,702	9	92
<b>10-Yr Avg.</b>	<b>74,143</b>	<b>13</b>	<b>88</b>
<b>2024</b>	<b>78,164</b>	<b>22</b>	<b>87</b>
<b>2024% Chg. To 10 Yr. Avg.</b>	<b>5%</b>	<b>71%</b>	<b>-1%</b>
<b>One Yr. % Chg.</b>	<b>-2%</b>	<b>144%</b>	<b>-5%</b>

Table 10 shows CenterPoint consistently responds to its emergency phone calls in 20 seconds or less in the overwhelming majority of cases. Compared to the ten-year average, CenterPoint in 2024 answered 1% fewer calls within 20 seconds, but was fairly stable compared to the 2023 performance. The number of emergency phone calls made to the Company in 2024 was 5% above the ten-year average and decreased by 2% from 2023. The average number of seconds before a call was answered in 2024 was 71% higher than the ten-year average and 144% higher the 2023 results. The Department will continue to monitor the average number of seconds before emergency phone calls are answered.

The Department concludes the Company has met the Commission’s gas emergency phone call reporting requirements for 2024.

<sup>32</sup> 25-33 Notice.

<sup>33</sup> CenterPoint Petition, at 5 and schedule 7.

*B.9. Gas Emergency Response Times*

The Notice of “Gas Service Quality Reporting Requirements” requires the following information on this topic.<sup>34</sup>

All Gas Utilities shall report:

- The percentage of emergencies responded to within one hour and within more than one hour.

Additionally, Xcel, CenterPoint, and MERC shall report:

- The average number of minutes it takes to respond to an emergency.

The Company reports its emergency response times by region; the Department combined the relevant regional data for documentation in Table 11.

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<sup>34</sup> 25-33 Notice.

Table 11: CenterPoint Gas Emergency Response Times 2013 - 2024<sup>35</sup>

Year	# of Emergency Calls Requiring Response	% of Calls Responded < 1 Hr	% of Calls Responded > 1 Hr	Avg. Response Time in Minutes
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	3
2020	36,737	97	3	28
2021	36,001	97	3	27
2022	37,332	97	3	25
2023	41,668	97	3	26
<b>10-Yr Avg.</b>	<b>39,390</b>	<b>94</b>	<b>6</b>	<b>31</b>
<b>2024</b>	<b>38,433</b>	<b>96</b>	<b>4</b>	<b>28</b>
<b>2024 - 10 Yr Avg % Chg</b>	<b>-2%</b>	<b>3%</b>	<b>-46%</b>	<b>-9%</b>
<b>One Yr. % Chg</b>	<b>-8%</b>	<b>-1%</b>	<b>17%</b>	<b>7%</b>

The Company had a decent year in 2024 in this regard. The number of calls was down from 2023 (8%) and below the ten-year average (-2%) but CenterPoint was able to maintain its percentage of calls responded to in less than one hour at 96%, which was slightly above the ten-year average (3%) and slightly below the 2023 results (-1%). The percentage of calls responded to in more than one hour was 46% below the ten-year average but 17% above the 2023 results. The average response time in 2024 was 28 minutes which was a 9% below the ten-year average and two minutes (7%) longer than the 2023 average response times.

The Department concludes the Company has met the Commission’s gas emergency response time reporting requirements for 2024.

*B.10. Excavation Damages (Formerly Mislocates)*

The Notice of “Gas Service Quality Reporting Requirements” requires:<sup>36</sup>

All Gas Utilities shall report on excavation damages using the following metrics:

<sup>35</sup> CenterPoint Petition, page 6 and Attachment D.

<sup>36</sup> 25-33 Notice.

- a. The number of excavation tickets received;
- b. The number of excavation damages;
- c. The number of excavation damages per 1.000 excavation tickets,  
and
- d. The number of at-fault damages.<sup>37</sup>

An “at fault damage” shall be defined as a damage were the root cause of the damage falls under the responsibility of the utility or its contractors including mislocates made by the company or its contract locating companies.

The Commission’s G999/CI-09-409 *Order* required CenterPoint to provide data on Gas System Damages and Mislocate Rates. The data provided for the Excavation Damages reporting requirement differs from the Gas System Damages and Mislocate Rates, so the data from prior years is not comparable.<sup>38</sup>

The Department compared the 2024 excavation damage numbers with those provided for 2023. This comparison indicates that most of the excavation damage statistics showed small increase, of no more than 11%, from the previous year, for statistics representing the following factors: a total excavation damages, number of at fault damages, number of damages other than at fault damages, number of damages per 1,000 excavation locate tickets, number of mislocates, and number of mislocates per 1,000 excavation locate tickets. The Department will continue to monitor the statistics representing excavation damages.

The Department concludes the Company has met the Excavation Damages reporting requirement for 2024.

#### *B.11. Gas Service Interruptions*

The Notice of “Gas Service Quality Reporting Requirements” required Gas Utilities to report the following information on service interruptions:<sup>39</sup>

All Gas Utilities except GMG shall report:

- The number of service interruptions categorized according to whether it was:
  - Caused by utility’s employees or contractors, or
  - Whether it was due to any unplanned cause.
- The number of customers whose service was interrupted.
- The average duration of interruptions.

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<sup>37</sup> The definition of an “at-fault damage” is one where the utility or its contractors are responsible for the damages. It also includes mislocates made by the Company and its contractors.

<sup>38</sup> Prior years’ results include all tickets whereas the 2023 information is only reporting excavation tickets.

<sup>39</sup> 25-33 Notice.

The Company provided this information in Schedule 10 of its Report. Table 12 provides details on CenterPoint’s natural gas service interruptions since 2020.<sup>40</sup>

Table 12: CenterPoint Service Interruptions 2013 - 2024<sup>41</sup>

Year	Total Service Interruptions (yr.)	# of Customers Affected (yr.)	Avg. Interruption (minutes)
2021	669	2,417	150
2022	540	1,437	161
2023	625	2,778	148
<b>3 yr. avg.</b>	<b>611</b>	<b>2,211</b>	<b>153</b>
<b>2024</b>	<b>691</b>	<b>3,424</b>	<b>144</b>
<b>% Chg. 2024 - 3 yr. Avg</b>	<b>13%</b>	<b>55%</b>	<b>-6%</b>
<b>2024 to 2023 % Chg.</b>	<b>11%</b>	<b>23%</b>	<b>-3%</b>

The Company had mixed results in 2024 regarding these metrics. The total number of service interruptions was slightly higher than the three-year average but 11% above the same figure in 2023. The total number of customers affected in 2024 by service interruptions was 55% above the three-year average and 23% higher than the 2023 results. The average interruption duration figure in 2024 was 6% lower than the three-year average and 3% below the 2023 results.

The Department concludes the Company has met the gas service interruption data requirements for 2024.

*B.12. Major Incident Reporting*

The Notice of “Gas Service Quality Reporting Requirements” included the following language regarding this topic.<sup>42</sup>

All Gas Utilities shall report:

- Summaries of major events that are immediately reportable to the Minnesota Office of Pipeline Safety (MNOPS) according to the criteria used by MNOPS to identify reportable events.
- Each summary shall include the following items:
  - The location
  - When the incident occurred
  - How many customers were affected
  - How the company was made aware of the incident
  - The root cause of the incident

<sup>40</sup> CenterPoint changed its service interruption information in 2019. Data collected prior to that date is inconsistent with data provided after that date.

<sup>41</sup> CenterPoint Petition, at 6 and schedule 10.

<sup>42</sup> 25-33 Notice.

- The actions taken to fix the problem
- What actions were taken to contact customers
- Any public relations or media issues
- Whether the customer or the company relighted
- The longest any customer was without gas service during the incident.

CenterPoint provided the required information in Schedules 11 and 11a. Table 13 provides the Company’s natural gas service interruptions classified as MNOPS reportable events.

Table 13: MNOPS Reportable Interruptions for CenterPoint<sup>43</sup>

<b>Year</b>	<b># of Reportable Interruptions</b>
2013	66
2014	97
2015	80
2016	56
2017	89
2018	93
2019	71
2020	56
2021	63
2022	37
2023	40
<b>10 yr. Avg.</b>	<b>68</b>
<b>2024</b>	<b>40</b>
<b>2024 - 10 yr. Avg</b>	<b>-41%</b>
<b>2024 to 2023</b>	<b>0%</b>

CenterPoint’s 2024 results demonstrated long-term improvement combined with a stabilization in the number of MNOPS’ reportable events compared to 2023. According to Schedule 11 of the Report, the majority of the 2024 MNOPS reportable interruptions were caused by damaged gas mains (53%). Fires were the second most numerous root cause (20%). The remaining 27% had various root causes, primarily damaged gas service. CenterPoint received 25 MNOPS violations in 2024, as compared to 19 in 2023 and 26 in 2022.<sup>44</sup>

The Department concludes CenterPoint met the Commission’s 2024 reporting requirements for Major Incident Reporting.

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<sup>43</sup> CenterPoint Petition, at 8.

<sup>44</sup> CenterPoint Petition, schedule 11.

### *B.13. Integrity Management Plan Reporting*

The Notice of “Gas Service Quality Reporting Requirements” included the following language regarding this topic.<sup>45</sup>

CenterPoint shall:

- annually file TIMP/DIMP data addressing the 29 metrics developed in its affiliated interest docket, updating three-year averages each year.
- CenterPoint shall replace its TIMP/DIMP leak-related reporting with the information provided in its PHMSA Distribution Reports (outlined below).

Xcel Energy, MERC, GMG, and Great Plains shall report the following metrics from their Annual PHMSA Distribution Reports in their service quality reports:

- Miles of Distribution Main
- Number of Main Leaks
- Number of Main Leaks by Cause
- Number of Hazardous Main Leaks by Cause
- Main Leaks per 1,000 Miles of Main
- Number of Services
- Number of Service Leaks.
- Number of Service Leaks by Cause
- Number of Hazardous Service Leaks by Cause
- Service Leaks per 1,000 Services
- 

The following two sections provide additional details on the Company’s reported performance measures required by the Commission’s updated reporting requirements.

#### *B.13.1. Transmission and Distribution Integrity Management Plan Performance Measures*

CenterPoint submitted select information on its TIMP and DIMP and provided a 2021 – 2023 three-year average as baseline for data comparison. Table 14 (following page) summarizes the cause of leaks incidents the Company experienced.

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<sup>45</sup> 25-33 Notice.

Table 14: 2024 CenterPoint Leak Causes Compared to Three-year Average<sup>46</sup>

<i>Leak Cause</i>	<b>3-Year Average for Years 2021-2023</b>		<b>Year 2024</b>	
	<u>Main Leaks</u>	<u>Service Leaks</u>	<i>Main Leaks</i>	<i>Service Leaks</i>
	Corrosion	43	139	18
Equipment Failure	66	302	78	5,673
Excavation	134	614	175	696
Incorrect Operations	23	69	16	121
Natural Force Damage	6	51	6	122
Other	1	10	2	3
Other Outside Force Damage	10	61	7	164
Pipe, Weld, or Joint Failure	14	34	7	63
<b>Total</b>	<b>297</b>	<b>1,280</b>	<b>309</b>	<b>7,197</b>

The total for the “Main” and “Service” Leaks categories is about 4% and 492% higher, respectively, than the 2021-2023 average. Within the “Service” Leaks category, the most significant increase occurred as a result of equipment failures.

The Department identified this overall increase in the number of leaks reported annually 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 15 provides data on the number of main and service line leaks associated with different pipeline materials.

<sup>46</sup> CenterPoint Energy, *Response to Department Information Request No. 2 adding schedules 18a, 18b, 18c*, July 28, 2025, Docket No. G008/M-25-33. (eDockets) [20257-221489-01](#) [20257-221489-03](#).

Table 15: 2024 Unit Cost by Project Category Compared to Three-year Average<sup>47</sup>

Project	3-Year Average for Years 2021 – 2023			Year 2024		
	Total Cost (\$)	Quantity (unit)	Unit Cost (\$/unit)	Total Cost (\$)	Quantity (unit)	Unit Cost (\$/unit)
Transmission Pipe Integrity	\$28,046,470	27,314	\$1,087	\$12,503,573	10,036	\$1,246
Bare Steel Mains	\$32,235,035	160,923	\$280	\$18,508,915	98,120	\$189
Copper Service Lines	\$1,468,079	328	\$4,983	\$1,884,822	406	\$4,642
Inside Meters	\$15,002,049	3,240	\$4,570	\$17,203,313	3,232	\$5,323
Vintage Plastic Pipes	\$2,648,931	402	\$6,805	\$1,759,844	324	\$5,432
Transmission Pipeline Replacement	\$21,779,969	13,335	\$1,768	0	0	N/A
Remote Control Valves	0	0	NA	0	0	N/A
Cast Iron Mains	0	0	NA	0	0	N/A

In 2024:

- two of the per-unit costs by project increased compared to the 2021-2023 three-year average (Transmission Pipeline Integrity and Inside Meters).
- four of the per-unit costs by project decreased compared to the 2021-2023 three-year average (Bare Steel Mains, Copper Service Lines, and Vintage Plastic Pipes).
- one project did not have any costs incurred in 2024 (Transmission Pipe Replacement).
- two projects continue to have no costs incurred in 2024 like the results for the 2021-2023 three-year average (Remote Control Valves and Cast-Iron Mains).

In a Department information request<sup>48</sup> in the Company’s 2023 docket, the Department asked why the remote-control valve and cast-iron mains total projects’ costs respectively have been \$0 annually since 2020 and why the Transmission Pipeline Replacement project total cost was \$0 in 2023. CenterPoint explained in its response that the Company no longer considers remote control valves as a separate integrity management project, that the Company’s cast iron mains were replaced as part of a Distribution Integrity Management Program that concluded in 2017, and that the Transmission Pipeline Replacement project concluded in 2022.

<sup>47</sup> CenterPoint Petition, schedule 18K.

<sup>48</sup> CenterPoint, Response to Department Information Request No. 9, September 23, 2024, Docket No. G008/M-24-33 (eDockets) [20249-210428-01](#).

Table 16: 2024 CenterPoint Material Associated with Leaks Compared to Three-year Average<sup>49</sup>

Gas Line Material	3-Year Average for Years 2021– 2023		Year 2024	
	Main Leaks	Service Leaks	Main Leaks	Service Leaks
Bare Steel	31	41	8	63
Coated Steel	89	142	90	172
Not Assigned/Unknown	3	8	3	11
Plastic-PE	130	683	140	763
Plastic-PE Aldyl A	43	231	49	229
PVC	NA	1	NA	0
Copper	NA	176	NA	182
<b>Total</b>	<b>424</b>	<b>1,282</b>	<b>290</b>	<b>1,420</b>

Table 16 shows, for 2024, (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. In total, the percentages of main leaks and service leaks were 32% lower and 11% higher respectively in 2024 than the three-year average.

Tables 17, 18, and 19 show select cost data for certain Company projects and repairs during 2024.

<sup>49</sup> CenterPoint, Response to Department Information Request No. 2 adding schedule 18a, 18b, 18c, July 28, 2025, July 28, 2025, Docket No. G008/M-25-33. (eDockets) [20257-221489-01](#) [20257-221489-03](#).

Table 17: 2024 Budget Variances Compared to 2021-2023 Three-Year Average Variances<sup>50</sup>

<b>Project</b>	<b>3-Year Average for Years 2021 – 2023</b>			<b>Year 2024</b>		
	<i>Forecast (\$)</i>	<i>Actual (\$)</i>	<i>Variance (\$)</i>	<i>Forecast (\$)</i>	<i>Actual (\$)</i>	<i>Variance (\$)</i>
Trans. Pipe Integ. (TIMP Cap.)	\$29,297,428	\$30,929,207	\$1,631,779	\$8,570,000	\$13,976,001	\$5,406,001
Trans. Pipeline Integ (TIMP Exp)	\$4,476,400	\$2,902,296	(\$1,574,104)	\$4,321,476	\$2,885,751	(\$1,435,725)
Bare Steel Mains	\$27,399,081	\$32,235,035	\$4,835,954	\$18,513,318	\$18,508,915	(\$4,223)
Copper Service Lines	\$1,405,513	\$1,468,079	\$62,566	\$2,160,600	\$1,884,822	(\$275,778)
Inside Meters	\$14,789,446	\$15,002,049	\$212,603	\$18,368,680	\$17,203,313	(\$1,165,367)
Vintage Plastic Pipe	\$2,585,700	\$2,648,931	\$63,231	\$3,021,600	\$1,759,844	(\$1,261,756)
Trans. Pipeline Replacement	\$19,800,000	\$21,779,969	\$1,979,969	\$0	\$0	\$0
Remote Control Valves	\$0	\$0	\$0	\$0	\$0	\$0
Cst Iron Mains	\$0	\$0	\$0	\$0	\$0	\$0
<b>Total</b>	\$99,753,568	\$106,965,566	\$7,211,998	\$54,955,674	\$56,218,646	\$1,263,152

The 2024 variance for all the projects identified was \$1.3M or 2% higher than budget. The main driver for that variance was the Transmission Pipeline Integrity (TIMP Capital). The Inside Meters, Copper Service Lines, and Vintage Plastic Pipe projects’ 2024 budgets increased compared to 2021-2023 average while the Transmission Pipeline Integrity, and Bare Steel Mains projects’ 2023 budgets decreased significantly compared to the 2021-2023 three-year average.

<sup>50</sup> CenterPoint Petition, schedule 18l.

Table 19: 2024 Average Annual Cost to Repair Leaks Compared to 2021-2023 Three-Year Average<sup>51</sup>

Description	3-Year Average for Years 2021 - 2023			Year 2024		
	Number	Repair Cost	Avg Cost	Number	Repair Cost	Avg Cost
<b>All Leak Repairs</b>				15,410	\$5,544,724	\$360
All Mains	547	\$1,496,082	\$2,737	492	\$1,323,055	\$2,689
All Meters	12,208	\$2,298,020	\$188	12,860	\$2,463,670	\$192
All Services	1,882	\$1,575,198	\$837	2,058	\$1,757,999	\$854
<b>Capitalized Leak Repairs</b>				2,564	\$2,421,351	\$944
Mains (capitalized)	170	\$800,262	\$4,707	189	\$775,242	\$4,102
Meters (capitalized)	585	\$384,352	\$657	1,325	\$648,531	\$489
Services (capitalized)	816	\$824,762	\$1,011	1,050	\$997,578	\$950
<b>Expensed Leak Repairs</b>				12,846	\$3,123,373	\$243
Mains (expensed)	377	\$695,821	\$1,847	303	\$547,813	\$1,808
Meters (expensed)	11,623	\$1,913,669	\$165	11,535	\$1,815,139	\$157
Services (expensed)	1,066	\$750,435	\$704	1,008	\$760,421	\$754

Comparing the 2024 results to the three-year average for all leak repairs:

- the number of main leak repairs declined 10%.
- the number of meter leak repairs increased by 5%.
- the number of services leak repairs increased by 9%.
- the average repair costs for mains declined by 1% and meters declined by 5%.
- the average repair costs for services increased by 7%.

The increase in the number of meter and service leak repairs, the decline in the number of main leak repairs and the decrease in average cost per repair for all the projects except the meter and service leaks and expensed service leak repairs, are all interesting trends. The Department will monitor the situation to see if those same trends continue in 2024.

**Summary**

The TIMP and DIMP information provided for 2024 is consistent with the data provided in prior years.

<sup>51</sup> CenterPoint Petition, schedule 18m.

*B.13.2. 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 20 through 23 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.<sup>52</sup>

“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 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 consider population of assets and therefore larger utilities would be seen as inherently riskier.”

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<sup>52</sup> In re: Compliance Filing of CenterPoint Energy Resources Corporation, d/b/a CenterPoint Energy Minnesota Gas, CenterPoint Energy, Reply Comments, November 18, 2021, Docket No. G008/M-21-303, (eDockets) [202111-179978-01](#).

Table 20: Relative Risk for Above the Ground Gas Facilities 2024 to Three-Year Average<sup>53</sup>

Risk by Cause for ABGF	2021 -2023 Avg.	2024	Nominal Change	Percentage Change
Corrosion	18,597	51,652	33,055	178%
Equipment	467,832	777,939	310,107	66%
Excavation	128,849	3,510	-125,339	-97%
Incorrect Operation	11,093	17,818	6,725	61%
Natural Forces	12,496	10,165	-2331	-19%
Other	7,571	0	-7571	-100%
Other Outside Force Damage	10,723	20,370	9,647	90%
Pipe, Weld or Joint Failure	4,819	699	-4120	-85%
<b>Total</b>	<b>643,980</b>	<b>882,153</b>	<b>220,173</b>	<b>34%</b>

The Department was concerned about the large percentage change between the 2023 and the three-year average (62% in Docket G008/M-24-33) relative risk for leaks for above ground gas facilities, in Docket No. G008/M-24-33, and requested additional information from the Company.<sup>54</sup>

CenterPoint replied:

The 2023 results for above ground gas facilities have a few factors contributing to the increase in risk score compared to the 3-year average. One factor in the risk score is count of leaks, there was a 28% increase in above ground facility leaks in 2023 as compared to the 3-year average. The Company utilizes advanced leak detection which has an increased sensitivity resulting in finding and repairing more leaks than traditional leak detection. The grade of leaks is also a factor in the risk score, with Grade 1 being weighted higher than Grade 2 or Grade 3 leaks. There was a 50% increase in Grade 1 above ground facility leaks in 2023 as compared to the 3-year average. There was also an increase in leaks located within a business district which have a higher weighting in the risk score than leaks not located within a business district.

In the current docket, the number of leaks continues to be higher than the 3-year average (i.e., 34%), although less so than that found in Docket No. G008/M-24-33. It appears that the number of leaks may be significantly higher due to the Company’s use of advanced leak detection technology. The Department will monitor this trend.

<sup>53</sup> CenterPoint Petition, schedule 18F.

<sup>54</sup> CenterPoint, *Response to Department Information Request No. 10*, September 23, 2024, Docket No. G008/M-24-33. (eDockets) [20249-210428-01](https://www.oregon.gov/energy/20249-210428-01).

Table 21: Relative Risk for Mains - 2023 to Three Year Average<sup>55</sup>

Risk by Cause for Mains	2021 -2023 Avg.	2024	Nominal Change	% Change
Corrosion	52,380	19,440	(32,940)	-63%
Equipment	97,470	56,430	(41,040)	-42%
Excavation	238,902	289,640	50,738	21%
Incorrect Operation	31,173	20,589	(10,584)	-34%
Natural Forces	8,664	7,309	(1,355)	-16%
Other	1,156	1,730	574	50%
Other Outside Force Damage	15,737	10,577	(5,160)	-33%
Pipe, Weld or Joint Failure	17,460	8,100	(9,360)	-54%
<b>Total</b>	<b>462,942</b>	<b>413,817</b>	<b>(49,125)</b>	<b>-11%</b>

The lower relative risks for all mains project categories except the “excavation” and “other” category is a positive result. The Department will continue to monitor this situation.

The 2024 relative risk for services was essentially unchanged when compared to the three-year average risk for services. Table 22 summarizes this information.

Table 22: Relative Risk for Services - 2024 to Three Year Average<sup>56</sup>

Risk by Cause for Services	2021 -2023 Avg.	2024	Nominal Change	Percentage Change
Corrosion	213,611	183,362	-30,249	-14%
Equipment	371,610	431,190	59,580	16%
Excavation	1,098,630	1,099,440	810	0%
Incorrect Operation	91,466	85,932	-5,534	-6%
Natural Forces	76,195	114,674	38,479	51%
Other	11,649	3,250	-8,399	-72%
Other Outside Force Damage	90,540	49,680	-40,860	-45%
Pipe, Weld or Joint Failure	38,700	25,110	-13,590	-35%
<b>Total</b>	<b>1,992,401</b>	<b>1,992,639</b>	<b>237</b>	<b>0%</b>

<sup>55</sup> CenterPoint Petition, schedule 18g

<sup>56</sup> CenterPoint Petition, schedule 18H.

Table 23 summarizes the relative risk for mains by material. Fortunately, the total relative risk for this project category declined by 11% compared to the 2021-2023 average.

Table 23: Relative Risk for Mains by Material - 2024 to Three Year Average<sup>57</sup>

Risk by Cause for Mains by Material	2021 -2023 Avg.	2024	Nominal Change	Percentage Change
Bare Steel	38,364	10,530	-27,834	-73%
Coated Steel	134,239	101,577	-32,662	-24%
Not Assigned/Unknown	5,692	3,245	-2,447	-43%
Plastic – PE	218,686	226,011	7,325	3%
Plastic-PE Aldyl A	65,961	72,452	6,491	10%
<b>Total</b>	<b>462,942</b>	<b>413,817</b>	<b>-49,125</b>	<b>-11%</b>

Table 24 summarizes the relative risk for services by material for 2024. The 2024 results suggest that CenterPoint is maintaining its system in a consistent manner year-to-year. The 2024 percentage change in relative risk for all materials was 0% higher than the 2021 – 2023 three-year average.

Table 24: Relative Risk for Services by Material - 2024 to Three Year Average<sup>58</sup>

Risk by Cause for Services by Material	2021 -2023 Avg.	2024	Nominal Change	Percentage Change
Bare Steel	61,114	66,423	5,309	9%
Coated Steel	201,031	201,881	850	0%
Copper	259,919	256,703	-3,216	-1%
Not Assigned/Unknown	9,121	16,200	7,079	78%
Plastic – PE	1,158,643	1,167,645	9,002	1%
Plastic-PE Aldyl A	301,493	281,852	-19,641	-7%
PVC	1,080	270	-810	-75%
<b>Total</b>	<b>1,992,401</b>	<b>1,990,974</b>	<b>-1,427</b>	<b>0%</b>

The Department concludes CenterPoint has complied with the Commission’s reporting requirements for 2024 for its Integrity Management Programs.

*B.14. EFV And Manual Shut-Off Valves*

The Commission issued its Notice of “Gas Service Quality Reporting Requirements” on May 12, 2025, in Docket Number G008/M-25-33. That document included the following language regarding this topic.<sup>59</sup>

<sup>57</sup> CenterPoint Petition, schedule 18I.

<sup>58</sup> CenterPoint Petition, schedule 18J.

<sup>59</sup> 25-33 Notice.

All Gas Utilities (except GMG, which has already completed the required outreach) shall confirm with the Commission that they have completed their EFV and manual shut-off valve outreach pursuant to the Commission’s July 31, 2019 Order in Docket No. 18-41. Upon receiving confirmation from the Commission, utilities that have completed their EFV and manual shut-off valve outreach may cease annual reporting on EFVs, manual shut-off valves and related outreach in their annual service quality reports, including the reporting of EFV and manual shut-off valve data pursuant to the Commission’s November 14, 2019 Order in Docket Nos. G-004/M-19-280, G-004/M-19-300, G-011/M-19-303, and G-002/M-19-305. Utilities shall continue appending their annual PHMSA reports to their service quality reports, which contains information on the number of EFVs and manual shut-off valves installed on their system.

Utilities that have completed EFV outreach and reporting . . . [include] CenterPoint.

CenterPoint included that information in Attachment A to the Report. Hence, the Department concludes the Company has complied with this reporting requirement for 2024.

*B.15. Web-Based Metrics*

The Commission issued its Notice of “Gas Service Quality Reporting Requirements” on May 12, 2025, in Docket Number G008/M-25-33. That document included the following language regarding this topic.<sup>60</sup>

Beginning in 2025, for reporting year 2024, All Gas Utilities shall report:

- The percentage of uptime of the utility’s enterprise-wide website (may not be state specific.)
- The percentage of uptime for web payment services ability (defined as the percentage of time that web payment services are available to some customers on utility-based platforms.)
- The error rate percentage for the utility-based payment services (defined as payment processing error rate – does not include errors outside of the utility’s control such as non-sufficient funds (“NSF”), expired customer debit or credit cards, etc.)
- The yearly total number of website visits to initial facing enterprise-wide website (may not be state specific.)
- The yearly number of logins via electronic customer communication platforms (to include enterprise-wide website and mobile apps, if applicable; may not be state-specific and provides combined total for all customer logins, regardless of platform.)

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<sup>60</sup> 25-33 Notice.

CenterPoint addressed web-based metrics in Schedule 19 of its petition, which states that the percentage of uptime for its enterprise-wide website and its web payment services system is 98.54%. The Department concludes CenterPoint has complied with the Commission’s reporting requirements for 2024 for its web-based metrics.

*B.16. CenterPoint-Specific Reporting: Call Center Detail*

The Commission issued its Notice of “Gas Service Quality Reporting Requirements” on May 12, 2025, in Docket Number G008/M-25-33. That document included the following language regarding this topic.<sup>61</sup>

CenterPoint shall report:

- The information contained in its Minn. Rule 7820.0500 annual report on Public Utilities Commission “formal” complaints on a quarterly basis and provide the same information on a quarterly basis for complaints from other state agencies and the Better Business Bureau.
- The total number of calls its call center receives.
- The number of these calls that come into the dedicated line for emergencies, billing inquiries, credit/payment arrangements, and service connection/disconnection requests.

CenterPoint provided this information in Schedule 16 of Section 6.1 and Schedule 17 of Section 6.2. Table 25 summarizes that information.

Table 25: Call Center Detail for 2024 and Comparison to 3 Year Average 2021 - 2023<sup>62</sup>

Description	2021-2023	2024	Nom Change	% Change
Billing Inquiries	1,460,323	1,462,248	1,925	0%
Credit/Payment Arrangements	69,904	70,092	188	0%
Service Connection/Disconnection Requests	77,900	63,327	-14,573	-19%
Emergency	73,376	78,164	4,788	7%
Business Customer Hotline	42,712	43,760	1,048	2%
<b>Total</b>	<b>1,724,215</b>	<b>1,717,591</b>	<b>-6,624</b>	<b>&lt;-1%</b>

The Department assumes the ongoing issues associated with the COVID-19 disconnection moratorium were at least partially responsible for the increase in billing calls and payment arrangements to the Company.

The Department concludes that CenterPoint has complied with this reporting requirement.

**IV. DEPARTMENT RECOMMENDATIONS**

Based on the above review and analysis, the Department recommends that the Commission accept the Company’s 2024 Gas Service Quality Report.

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62 CenterPoint Petition, schedule 16.

Appendix

Appendix

## Attachments

## **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-25-33**

Dated this **22<sup>nd</sup>** day of **September 2025**

**/s/Sharon Ferguson**

<b>First #</b>	<b>Name</b>	<b>Last Name</b>	<b>Email</b>	<b>Organization</b>	<b>Agency</b>	<b>Address</b>	<b>Delivery Method</b>	<b>Alternate Delivery Method</b>	<b>View Trade Secret</b>	<b>Service List Name</b>
1	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		No	M-25-33
2	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-33
3	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-33
4	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	M-25-33
5	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	M-25-33
6	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	M-25-33
7	Emily	Suppes	emily.suppes@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-33
8	Donald	Wynia	donald.wynia@centerpointenergy.com	CenterPoint Energy		CenterPoint Energy 505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-33