



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

November 19, 2018

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

RE: Information Request (IR) Responses of CenterPoint Energy Minnesota Gas, A Division of CenterPoint Energy Resources Corp., for its 2017 Annual Service Quality Report; MPUC Docket No. G-008/M-18-312

Dear Mr. Wolf:

Attached please find CenterPoint Energy's responses to the Minnesota Public Utilities Commission's Information Requests # 1-6.

If you have any questions regarding the information provided in this filing, please contact me at (612) 321-4905.

Sincerely,

/s/

Shari Grams
Regulatory Analyst

Enclosures
cc: Service List

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 filing of CenterPoint Energy in Docket No. G-008/M-18-312 via e-filing to the Minnesota PUC, as well as those requesting electronic service on the service list and to all others on the service list via U.S. Mail at the City of Minneapolis.

 /s/
Shari Grams

Subscribed and sworn to before me
this 19th day of November, 2018.

 /s/
Mary Jo Schuh, Notary Public
My Commission expires 1/31/2020

| 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 |
| Melodee | Carlson Chang | melodee.carlsonchang@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 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|----------------|-----------------------------------|------------------------------------|--|--------------------|-------------------|------------------------|
| Amber | Lee | Amber.Lee@centerpointenergy.com | centerPoint Energy | 505 Nicollet Mall Minneapolis, MN 55402 | 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 |
| 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 |
| | | | | | | | |

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|------------|-----------|----------------------|-----------------------------|---|--------------------|-------------------|------------------------|
| 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 |

This question is:

Trade Secret
 Public

**State of Minnesota
Public Utilities Commission**

Utility Information Request

Docket Numbers: G004/M-18-286, G008/M-18-312, G022/M18-314, G002/M-18-316, and G011/M-18-317

Date of Request: October 12, 2018

Requested From: CenterPoint Energy,
Great Plains Natural Gas Company,
Greater Minnesota Gas, Inc.,
Minnesota Energy Resources Corporation,
and Xcel Energy

Response Due: 30 business days

Analyst Requesting Information: Marc Fournier

Type of Inquiry:

| | | | | | |
|--------------------------|-----------------|--------------------------|----------------|-------------------------------------|--------------|
| <input type="checkbox"/> | Financial | <input type="checkbox"/> | Rate of Return | <input type="checkbox"/> | Rate Design |
| <input type="checkbox"/> | Engineering | <input type="checkbox"/> | Forecasting | <input type="checkbox"/> | Conservation |
| <input type="checkbox"/> | Cost of Service | <input type="checkbox"/> | CIP | <input checked="" type="checkbox"/> | Other: |

If you feel your responses are proprietary, please indicate.

**Request
Number**

PUC # 1

Please provide an analysis of whether any of the following reports or data would enhance the Commission's evaluation of the company's level of service quality:

- a. The data required under Title 49 Code of Federal Regulations §192.1007 (e):

Performance measures developed from an established baseline to evaluate the effectiveness of a company's Integrity Management (IM) program. These performance measures include the following:

- (i) Number of hazardous leaks either eliminated or repaired as required by § 192.703(c) of this subchapter (or total number of leaks if all leaks are repaired when found), categorized by cause;
- (ii) Number of excavation damages;
- (iii) Number of excavation tickets (receipt of information by the underground facility operator from the notification center);
- (iv) Total number of leaks either eliminated or repaired, categorized by cause;

- (v) Number of hazardous leaks either eliminated or repaired as required by § 192.703(c) (or total number of leaks if all leaks are repaired when found), categorized by material; and
 - (vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the operator's IM program in controlling each identified threat.
- b. A summary of any 2017 emergency response violations cited by MNOPS along with a description of the violation and remediation in each circumstance; and
 - c. The number of violation letters your company has received from MNOPS during the year in question.

Company Response to 1(a):

The Company does not believe the Commission's evaluation of the level of customer service would be enhanced by a review of the information provided under §192.1007(e). Items (ii) and (iii) are related to excavation tickets and damages, and similar information is already provided in the Service Quality reports in Schedules 8 and 9. Items (i), (iv), and (v) relate to leak management practices, which are regulated under PHMSA Part 192 regulations, and are subject to review by MNOPS. The Company does not believe an additional review by the Commission would provide meaningful information about the quality of service provided to customers.

Company Response to 1(b) & 1(c):

The Company does not believe the Commission's evaluation of the level of customer service would be enhanced by either a review of a summary of emergency response violations cited by MNOPS and corresponding remediation, or the reporting of the number of violation letters received by the Company from MNOPS. Information on the Company's emergency response performance is already provided in the Service Quality reports in Schedules 7 and 12.

MNOPS has an established process to audit the Company's performance and issue various audit exceptions. That process includes a way for the Company to respond to the audit findings and show the findings are unwarranted, should be modified, or provide improvements to its operations to address the audit findings. The Company does not believe an additional review by the Commission would provide meaningful information about the quality of service provided to customers.

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 Public

**State of Minnesota
Public Utilities Commission**

Utility Information Request

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Response Due: 30 business days

Analyst Requesting Information: Marc Fournier

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| <input type="checkbox"/> | Financial | <input type="checkbox"/> | Rate of Return | <input type="checkbox"/> | Rate Design |
| <input type="checkbox"/> | Engineering | <input type="checkbox"/> | Forecasting | <input type="checkbox"/> | Conservation |
| <input type="checkbox"/> | Cost of Service | <input type="checkbox"/> | CIP | <input checked="" type="checkbox"/> | Other: |

If you feel your responses are proprietary, please indicate.

**Request
Number**

PUC # 2

Please identify any other PHMSA and MNOPS reporting requirements not presently collected by the Commission that gas utilities might suggest as being useful in order to give the Commission a fuller picture of a gas utility's service quality performance. This may include reporting required by 49 CFR Part 191 such as the Incident Report required by §191.9 and the Annual Report required by §191.11.

Company Response:

The Company has not identified additional information provided to PHMSA and/or MNOPS that it believes would give the Commission a fuller picture of CenterPoint Energy's service quality performance. The Company points out that it already provides information on incidents reportable to MNOPS on Schedule 11 of the Service Quality reports. In addition, the Company's DOT Annual Report is publicly available.

This question is:

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 Public

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|--------------------------|-----------------|--------------------------|----------------|-------------------------------------|--------------|
| <input type="checkbox"/> | Financial | <input type="checkbox"/> | Rate of Return | <input type="checkbox"/> | Rate Design |
| <input type="checkbox"/> | Engineering | <input type="checkbox"/> | Forecasting | <input type="checkbox"/> | Conservation |
| <input type="checkbox"/> | Cost of Service | <input type="checkbox"/> | CIP | <input checked="" type="checkbox"/> | Other: |

If you feel your responses are proprietary, please indicate.

**Request
Number**

PUC # 3: Please provide your company's standard customer service window for customer premise visits (when the customer's presence is required).

Company Response: The Company's standard customer service window for customer premise visits (when the customer's presence is required) is eight hours, with the exception of work orders for atmospheric corrosion inspections and service restoration when service was interrupted by the Company for maintenance activities. For atmospheric corrosion inspections, the Company uses a two-hour service window; for service restoration after maintenance interruptions, the Company uses a four-hour window.

This question is:

Trade Secret
 Public

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Utility Information Request

Docket Numbers: G004/M-18-286, G008/M-18-312, G022/M18-314, G002/M-18-316, and G011/M-18-317

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Great Plains Natural Gas Company,
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and Xcel Energy

Response Due: 30 business days

Analyst Requesting Information: Marc Fournier

Type of Inquiry:

| | | | | | |
|--------------------------|-----------------|--------------------------|----------------|-------------------------------------|--------------|
| <input type="checkbox"/> | Financial | <input type="checkbox"/> | Rate of Return | <input type="checkbox"/> | Rate Design |
| <input type="checkbox"/> | Engineering | <input type="checkbox"/> | Forecasting | <input type="checkbox"/> | Conservation |
| <input type="checkbox"/> | Cost of Service | <input type="checkbox"/> | CIP | <input checked="" type="checkbox"/> | Other: |

If you feel your responses are proprietary, please indicate.

**Request
Number**

PUC # 4: Please provide the rationale for the length of your customer service window for customer premise visits (when the customer's presence is required).

Company Response: CenterPoint Energy has established these scheduling guidelines to balance our workload and staffing. These guidelines prioritize urgent needs (such as emergency orders), while striving to sustain customer satisfaction in the following ways:

1. Prioritizing emergency and safety related calls over non-emergency customer service issues;
2. Allowing us to serve the maximum number of customers each day; and
3. Maintaining reasonable rates by reducing staffing and overtime expenditures.

This question is:

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Response Due: 30 business days

Analyst Requesting Information: Marc Fournier

Type of Inquiry:

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|--------------------------|-----------------|--------------------------|----------------|-------------------------------------|--------------|
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| <input type="checkbox"/> | Engineering | <input type="checkbox"/> | Forecasting | <input type="checkbox"/> | Conservation |
| <input type="checkbox"/> | Cost of Service | <input type="checkbox"/> | CIP | <input checked="" type="checkbox"/> | Other: |

If you feel your responses are proprietary, please indicate.

**Request
Number**

PUC # 5: If you company's customer service window for customer premise visits (when the customer's presence is required) is greater than four hours, are there other utilities or businesses that give customers a service window greater than four hours?

Company Response: CenterPoint Energy provided its customer service windows for customer premise visits in PUC Information Request #3. The customer service windows of other utilities and businesses may be greater than or less than four hours, and the Company does not have access to a database of the customer service windows of other entities. Additionally, comparability of customer service practices between utilities and businesses may vary for many reasons, including: the area where service is provided, dispatching response time procedures, type of services provided (natural gas, electric, or telecommunications), etc.

This question is:

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 Public

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Public Utilities Commission**

Utility Information Request

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| <input type="checkbox"/> | Engineering | <input type="checkbox"/> | Forecasting | <input type="checkbox"/> | Conservation |
| <input type="checkbox"/> | Cost of Service | <input type="checkbox"/> | CIP | <input checked="" type="checkbox"/> | Other: |

If you feel your responses are proprietary, please indicate.

**Request
Number**

PUC # 6: If you company has a customer service window for customer premise visits (when the customer's presence is required) greater than four hours, is it possible or practical for the company to narrow the window to two or four hours?

Company Response: The Company believes it could be possible to reduce the customer service window by increasing labor resources, but the Company has not performed any studies to identify the cost of such a change or whether labor resources are available.