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June 12, 2014

Dr. Burl Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101-2147

RE: Reply Comments of CenterPoint Energy  
Docket No. G008/M-14-316

Dear Dr. Haar:

CenterPoint Energy (the Company) submits these *Reply Comments* in response to the *Comments* of the Minnesota Department of Commerce (Department) in the matter of the Company's 2013 *Annual Service Quality Report* (Report). The Company appreciates the Department's thorough review and analysis of the Report. In its *Comments*, the Department recommended acceptance of the Report, pending the provision of responses to various inquiries in Reply Comments.

The Department requests that the Company provide the following in Reply Comments:

- details regarding gas line damages in 2013 similar to those provided in 2012;
- data regarding customers who choose to zero out of a menu while interacting with IVR;
- discussion regarding reasons November and December have consistently provided the highest number of required deposits in the last three calendar years;
- discussion regarding the increased outage durations in 2013, including possible causes and measures that can or will be taken to reduce outage durations; and
- explanation for the significantly higher proportion of outages due to employees/contractors in 2013 compared with past years despite a lower number of outages overall;

CenterPoint Energy respectfully submits the following responses to the Department's request;

#### Gas Line Damages

In its Comments, the Department recommends the Company delineate the type of damage for the gas lines (i.e. Inadequate Hand Digging, etc.). In 2013, no such information was provided. The Department requests that the Company

provide details regarding the 2013 gas line damages in Reply Comments, and provide this information in future reports.

Inadequate Hand Digging accounted for 26% of our damages, which is a 4% reduction from the previous year, and No Locate Ticket Requested accounted for 19% of the damages, which is a 2% reduction from the previous year. We worked with, and continue to work with, the Minnesota Office of Pipeline Safety and Gopher State One Call to help reduce these types of damages.

#### Additional IVR Data

The Department notes that the data provided by the Company with regard to IVR does not include the number of customers that choose to 'zero out' of an IVR menu. This is a common complaint in many IVR systems and can lead to customer fatigue and frustration. The Department requests that the Company provide in Reply Comments, the number of customers that zero out of a menu while interacting with the IVR menu.

CenterPoint only recently made changes to its IVR system to allow for measuring the volume of customers who chose to zero out. The reporting changes were implemented in July of 2013, with August 2013 being the first complete month; the results below reflect all of the history that we have available through December 2013.

Percent of Zero Out by Month;

Month	Aug-2013	Sep-2013	Oct-2013	Nov-2013	Dec-2013
Customers who went into the IVR	113,441	103,748	112,508	96,561	119,310
Customers who "0" (Zero) out of the IVR	5,456	5,042	4,937	4,138	5,034
Customers who came out of the IVR and went on to an agent	74,578	68,781	76,179	62,878	75,396
Customers Handled IN the IVR	38,863	34,967	36,329	33,683	43,914
% of "0" out to Customer who went into IVR	5%	5%	4%	4%	4%

#### Deposits

The Department requests that the Company provide a discussion regarding possible reasons the same two months (November and December) have provided the highest number of required deposits in the last three calendar years.

Over the past three years, November and December have consistently been high deposit months primarily due to Commercial Account reconnections and delinquent Commercial Accounts. CenterPoint Energy does not analyze the seasonal nature of deposits, if we were to speculate, we would guess customers are reconnecting for the winter heating season.

### Outages

The Department would like CenterPoint to provide a discussion in Reply Comments regarding the increased outage durations in 2013, including possible causes, and steps that can be taken in the future to reduce the average duration of outages, especially in winter months.

The increase in average outage durations during 2013 is largely due to an anomaly that reduced the 2012 time by several minutes. During May 2012, there were 566 customers without gas for an average of 15 minutes. This had the effect of lowering the average gas off time for the year by approximately 20 minutes. The 2013 gas off time of 62 minutes is equivalent to the 2011 number. CenterPoint Energy has also implemented requirements for field personnel to get supervisory approval prior to entering a gaseous atmosphere. This coincides with efforts to enhance employee safety - without sacrificing public safety - by making concerted efforts to shut off gas flow remotely.

The Department requests that the Company discuss, in Reply Comments, why the proportion of outages due to employees/contractors is significantly larger in 2013.

In looking at the details on our reports we found that the numbers for August outages due to All other causes were input under Employee/Contractor by mistake. With that change the actual number of outages caused by Employee/Contractor went down considerably from our original report. A revised Schedule 10 is included as an attachment to these comments.

CenterPoint Energy respectfully requests that the Commission consider the reply comments expressed above and accept CenterPoint Energy's 2013 Annual Service Quality Report.

If you have any questions about this information, please contact me at (612) 321-5140.

Sincerely,

/s/

Pam Thomas  
Regulatory Financial Analyst

cc: Service List

**CenterPoint Energy  
2013 Service Quality Report**

**Schedule 10**

**Gas Service Interruptions**

	January	February	March	April	May	June	July	August	September	October	November	December	Total
Outages Due to Employees/Contractors													
Number of Customers	2	4	6	10	29	23	101	24	173	11	7	2	392
Number Outages	2	1	6	10	6	11	17	5	79	11	7	2	157
Average duration of outage (in minutes)	53	53	195	111	22	53	21	38	52	184	153	181	51
Outages Due to All Other Causes													
Number of Customers	10	1	1	5	65	71	233	73	68	73	68	13	681
Number Outages	9	1	1	2	32	63	82	72	15	67	27	13	384
Average duration of outage (in minutes)	81	180	120	57	66	89	42	101	30	128	55	156	68
<b>Total</b>													
Number of Customers	12	5	7	15	94	94	334	97	241	84	75	15	1,073
Number Outages	11	2	7	12	38	74	99	77	94	78	34	15	541
Average duration of outage (in minutes)	76	78	184	93	52	80	36	86	46	135	64	159	62
Total Minutes	915	390	1,290	1,395	4,890	7,545	12,041	8,294	11,045	11,350	4,829	2,387	66,369

In August 2013 the highlighted numbers were recorded in the wrong row. The numbers for Outages due to Employee/Contractors was input into outages Due to All Others and vice versa.

**AFFIDAVIT OF SERVICE**

STATE OF MINNESOTA    )  
  ) ss.  
COUNTY OF HENNEPIN    )

Pamela Thomas, being first duly sworn on oath, deposes and says she served the attached Reply Comments by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, to all persons on the attached service list by having the document delivered by electronic filing or by placing in the U. S. Mail at the City of Minneapolis, Minnesota:

/s/ \_\_\_\_\_  
Pamela Thomas  
Regulatory Financial Analyst  
CenterPoint Energy

Subscribed and sworn to before me  
this 12<sup>th</sup> day of June, 2014

/s/ \_\_\_\_\_  
Mary Jo Schuh  
Notary Public  
My Commission Expires on January 31, 2015.

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