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July 13, 2015

Mr. Daniel Wolf
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-15-414

Dear Mr. Wolf:

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 2014 *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:

- data regarding customers who choose to zero out of a menu while interacting with the Interactive Voice Response (IVR);
- discussion regarding the reasons for an increase in the number of meters not read for more than 12 months;
- discussion regarding reasons the emergency call answer time in the non-heating season was lower than in the heating season;
- details regarding gas line damages in 2014 similar to those provided in 2013.

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

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. 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 and provide this information in future reports.

The Company provides the attached Schedule 1a, Percent of Zero Out by Month, to address the Department's request. The data shows an overall zero out rate of 4% for 2014. This is similar to the available 2013 average of 5% (August-December). The Company notes that its new IVR system is a "natural language" voice recognition system and fewer customers have chosen the zero out option in 2015 than in the past. The Company will provide this data in future Service Quality reports.

Meters not Read in 12 Months

In its Comments, the Department requests that the Company provide a discussion of the increase in the average number of meters not read in 12 months from 68 in 2013 to 101 in 2014. Typically, meters not read for an extended period of time are located in an area that does not provide access to Company employees to obtain meter readings or perform routine maintenance. While the Company attempts to coordinate with customers to obtain such access, in some cases customer cooperation is withheld. In those rare cases, the Company may exercise its right to obtain a court order for access to its equipment; however, the Company did not do so for these accounts in 2014 and the average number of meters not read in 12 months increased. The Company is reinstating the process in 2015 and the number of such meters has again started to decrease.

Emergency Call Answer Time

In its Comments, the Department requests the Company discuss the lower emergency call answer times in the non-heating season months compared to the heating season. The reduction in emergency call answer time to levels below 80% within 20 seconds occurred in the months May through August, October and November. These months correspond with the reduced call center service level due to the technology implementations discussed in the Report. While the emergency calls are placed at the head of the call queue when received, they must still wait for an agent to become available. During these months, agent availability was affected by the technology implementations and this therefore also affected emergency call answer time. The Company notes that the average speed of answer during these months was 26 seconds. In addition, since December 2014, the emergency call answer times have exceeded 80% each month. The Company intends to provide the same level of emergency call

response throughout the year, regardless of whether a given month is within the heating season.

Gas Line Damages

In its Comments, the Department requests that the Company provide details regarding the 2014 gas line damages by delineating the type of damage for the gas lines (i.e. Inadequate Hand Digging, etc.). The Company regrets not providing this information in its Report and will provide it in future reports.

Inadequate Hand Digging accounted for 28% of our damages, which is a two percentage point increase from the previous year, and No Locate Ticket Requested accounted for 18% of the damages, which is a one percentage point 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. Also, in order to reduce this type of damage, we conducted a Spring damage prevention meeting for excavators, with a special invitation to those who have had multiple damages to our facilities.

CenterPoint Energy respectfully requests that the Commission consider the reply comments expressed above and accept CenterPoint Energy's 2014 Annual Service Quality Report.

If you have any questions about this information, please contact me at (612) 321-4719.

Sincerely,

/s/

Adam Pyles
Director, Regulatory Activities

Enclosure
cc: Service List

**CenterPoint Energy
Service Quality Report**

Schedule 1a

Percent of Zero Out by Month

IVR Data

(Utility only)	Jan-2014	Feb-2014	Mar-2014	Apr-2014	May-2014	Jun-2014	Jul-2014	Aug-2014	Sep-2014	Oct-2014	Nov-2014	Dec-2014	YTD 2014
Customers who went into the IVR	119,961	122,644	134,990	138,624	136,933	127,419	115,472	98,195	101,429	105,786	109,814	162,927	1,474,194
Customers who "0" (Zero) out of the IVR	6,231	6,471	6,584	6,542	5,745	5,007	5,493	5,120	5,101	5,667	4,103	2,097	64,161
Customers who came out of the IVR and went on to an agent	73,107	71,374	78,238	81,978	78,113	74,056	64,818	49,329	50,101	54,826	54,664	80,633	811,237
Customers handled IN the IVR	46,854	51,270	56,752	56,646	58,820	53,363	50,654	48,866	51,328	50,960	55,150	82,294	662,957
Percentage of Zero Out	5%	5%	5%	5%	4%	4%	5%	5%	5%	5%	4%	1%	4%

AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

Mary Jo Schuh, being first duly sworn on oath, deposes and says she served the attached Reply Comments in Docket No. G-008/M-15-414 via e-filing to the Minnesota PUC and DOC, as well as all other parties on the attached Service List.

/s/ _____
Mary Jo Schuh

Subscribed and sworn to before me
this 13th day of July, 2015.

/s/ _____
Linda Baumann, Notary Public
My Commission expires 1/31/20

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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