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Minneapolis, MN 55459-0038

December 6, 2019

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

RE: In the Matter of CenterPoint Energy's Natural Gas Service Quality Report for 2018

Compliance Filing

Docket No. G-008/M-19-300

Dear Mr. Wolf:

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or the "Company") respectfully submits this filing in compliance with the Commission's November 14, 2019 Order in this docket.

In Ordering Point 1b of the Commission's November 14 Order, the Commission required CenterPoint Energy to provide "recommendations for uniform reporting of annual and overall EFV and manual shutoff valve installation on their distribution system" after consulting with other gas utilities also required to report excess flow valve ("EFV") metrics.

CenterPoint Energy has consulted with Xcel Energy, Minnesota Energy Resources Corporation, and Great Plains Natural Gas Company and together the companies have agreed as follows:

A uniform definition of the number of customers suitable for EFV

A customer is suitable for an EFV if they fall under the installation requirements of 49 CFR § 192.383, which is having a service operated at least 10 pounds per square inch gauge and serve a customer load not greater than 1,000 standard cubic feet per hour. However, we note that the actual number of customers (or services) with technical feasibility for an EFV installation may vary since an engineering analysis is required, on a case-by-case basis, to determine actual technical feasibility.

A uniform definition of the number of customers suitable for manual shut-off valves

A customer is suitable for a manual shut-off valve if they do not meet the requirements of 49 CFR § 192.383.

A uniform metric to be reported as a percentage of customers with installations of both and metrics for the number of customers receiving installations upon request prior to a system upgrade that would require the installation of EFVs

The above-referenced natural gas companies recommend the following uniform metrics to report the percentage of customers with installations of EFVs and manual shut-off valves; and the number of customers receiving installations upon request prior to a system upgrade:

EFV Installation

Number of Customers Suitable for EFV Installation¹ (a)	Total Number of Installed EFVs (b)	Number of Customers Who Requested Installation² (c)	Percentage of Suitable Customers with EFVs (d)	Number of Customers Unsuitable for EFVs³ (e)
		(subset of (b))	(b)/(a)	

Manual Shut-Off Installation

Number of Customers Suitable for Manual Shut-Off Valves⁴ (a)	Total Number of Installed Manual Shut-Off Valves (b)	Number of Customers Who Requested Installation⁵ (c)	Percentage of Suitable Customers with Manual Shut-Off Valves (d)
		(subset of (b))	(b)/(a)

In agreeing to these metrics, the above referenced natural gas utilities noted that because of the difference in how records are maintained and can be pulled from electronic systems, each utility will have to define for the Commission how they count “numbers of customers” for the purposes of reporting metrics. Each natural gas utility proposes to describe how it derived its “number of customers” for purposes of this report in its Annual Natural Gas Service Quality Report.

¹ A customer is suitable for an EFV if they fall under the installation requirements of 49 CFR § 192.383, which is having a service operated at least 10 pounds per square inch gauge and serve a customer load not greater than 1,000 standard cubic feet per hour. However, the actual number of services with technical feasibility for an EFV installation may vary since an engineering analysis is required, on a case-by-case basis, to determine technical feasibility.

² Since August 20, 2018, which is the date of the Commission’s Order Finding that Excess Flow Valves Comply with Federal Regulations and Taking Other Actions in Docket No. G-999/CI-18-41.

³ A customer unsuitable for an EFV may be suitable for a manual shut-off valve.

⁴ A customer is suitable for a manual shut-off valve if they do not meet the requirements of 49 CFR § 192.383.

⁵ Since August 20, 2018, which is the date of the Commission’s Order Finding that Excess Flow Valves Comply with Federal Regulations and Taking Other Actions in Docket No. G-999/CI-18-41.

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Please feel free to contact me at 612-321-4334 or erica.larson@centerpointenergy.com with any questions.

Sincerely,

/s/ Erica Larson

Erica Larson
Regulatory Analyst

C: Service List

AFFIDAVIT OF SERVICE

[illegible]

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

/s/ _____
Erica Larson
Regulatory Analyst
CenterPoint Energy

Subscribed and sworn to before me
this 6th day of December 2019

/s/ Melodee S. Carlson Chang
Melodee S. Carlson Chang
Notary Public (Commission Expires January 31, 2024)

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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_19-300_M-19-300
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-300_M-19-300
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