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September 21, 2020

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 East Seventh Place, Suite 350
St. Paul, MN 55101-2147

**RE: Compliance Filing of CenterPoint Energy Resources Corporation, d/b/a
CenterPoint Energy Minnesota Gas – Gas Service Quality Annual Report**

Docket No. G-008/M-20-453

Supplemental Comments

Dear Mr. Seuffert:

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or the "Company") respectfully submits these Supplemental Comments responding to the Response Comments of the Minnesota Department of Commerce ("Department") filed on September 9, 2020 in this docket.

The Company thanks the Department for its analysis of the 2019 Service Quality Report and agrees with the Department's conclusion that the Commission should accept the Report. The Department recommended that the Commission require CenterPoint Energy to continue to report metrics from item 3 of the Commission's April 12, 2019 Order in Docket No. G-008/M-18-312 and to provide a consistent approach to its calculation of risk for current and historical years in its next Service Quality Report, as it did in this year's Report. The Company has no objection to these reporting requirements.

The Department also requested that the Company provide additional information regarding:

- The difference between a compromise and an agreement in the Company's classification of customer complaints; and
- Why the average risk of different facilities as calculated by the Company has increased relative to the three-year average.

Below the Company addresses these two items.

I. Compromise vs. Agreement

As the Company noted in its Reply Comments in this docket, a complaint should be marked as resolved on agreement if the Company resolves the situation by completely agreeing with the customer's position, whereas it should be marked as a compromise if there is more give-and-take between the customer and the Company. We stated that we believed that the increase in compromises in our 2019 numbers, as opposed to agreements, was caused at least in part by two new customer service agents who were much more likely to code resolutions as compromises rather than agreements. The Company has followed up with the agents to make sure they are clear on the difference between compromises and agreements.

There are certainly situations when reasonable minds will differ on whether a particular complaint was resolved on agreement or on compromise. If the Commission, Department, and other stakeholders are not finding value in the distinction, we would be happy to combine the categories in our next year's report.

II. Average Risks

In our Reply Comments, we described how fully incorporating Picarro units into our leak detection program has made us able to detect many more leaks than previously, causing our leak counts to rise. As we stated in Reply Comments, the Company does not believe that our facilities are more prone to leaks, but we are discovering more and smaller leaks than previously. Finding and repairing more leaks is to the benefit of ratepayers because it reduces charging for unused gas through the Purchase Gas Adjustment and reduces methane emissions into the atmosphere.

Our calculation of risk for different facilities is in part based on the historical frequency of leaks we've seen on those facilities. Accordingly, as the number of leaks we have detected has risen, our calculated risk figures have also risen.

III. Conclusion

The Company appreciates the opportunity to respond to the Response Comments of the Department. As discussed above, the Company agrees with the Department's recommendation that the Commission accept the Company's 2019 Service Quality Report.

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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
Senior Regulatory Analyst, Regulatory Affairs

C: Service List

CERTIFICATE OF SERVICE

Erica Larson served the above Supplemental Comments of CenterPoint Energy to all persons at the addresses indicated on the attached list by having the document delivered by electronic filing.

/s/ _____
Erica Larson
Regulatory Analyst
CenterPoint Energy

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