

STATE OF MINNESOTA
BEFORE THE PUBLIC UTILITIES COMMISSION

Katie Sieben	Chair
Joseph K. Sullivan	Vice-Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
John Tuma	Commissioner

In the Matter of the Petition by CenterPoint
Energy for Approval of a Rate Stabilization
Plan

MPUC DOCKET NO. G-008/M-21-755

**REPLY COMMENTS OF THE
SUBURBAN RATE AUTHORITY**

REPLY

The Suburban Rate Authority (“SRA”) has reviewed the comments of the Department of Commerce (“DOC”) and Office of the Attorney General (“OAG”), in addition to Citizen’s Utilities Board (“CUB”) and Energy Cents Coalition (“ECC”) on the unique CenterPoint Energy (“CPE”) Rate Stabilization Plan. The SRA appreciates CPE’s offer to mitigate rates in the upcoming heating season and beyond and its efforts to reach out to stakeholders with information on the Plan in this short turnaround time. The SRA understands that CPE will be providing additional information in its Reply.

The DOC and OAG objections to the Plan include, among other things, the requested approval of \$39.7 million in base revenue increase without the opportunity for adequate review and examination. This is highly concerning to the SRA, notwithstanding the initial appeal of multiple CPE-proposed rate mitigation measures. Ratepayers and intervenors including the SRA, value greatly and, indeed, rely on the comprehensive rate review carried out by the DOC and OAG when utilities seek rate increases. Their review assures ratepayers served by the petitioning utility that, e.g., utility sales forecasts, class cost of service allocations, rate of return and other important issues are addressed to assist the Commission in establishing reasonable rates.

Here, DOC and OAG state that if accepted by the Commission, CPE's Plan for a \$39.7 million partial rate increase would be approved without adequate analysis. Though subject to a prudence review in two years, this feature of the Plan is without precedent, and it is distinguishable from the earlier Xcel Energy stay-outs based on true-ups of previously DOC/OAG reviewed, and Commission-approved data. The SRA agrees that this prominent feature of the Plan strays too far from established ratepayer-protections for non-interim rate increases, notwithstanding a prudence review in 2024.

Accordingly, the SRA supports the DOC and OAG in their request that the Commission deny the Plan as presently structured. The SRA, however, represents many ratepayers in member cities that need rate relief during these unique circumstances. With the necessary pre-approval ratepayer protections, the SRA remains interested in a ratepayer 2022 mitigation proposals by CPE.

Respectfully submitted,

Dated: November 15, 2021.

KENNEDY & GRAVEN, CHARTERED

By: /s/ James M. Strommen
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ATTORNEYS FOR THE
SUBURBAN RATE AUTHORITY

and

Dated: November 15, 2021.

ENERGY TARIFF EXPERTS, LLC

By: /s/ James Bride
James Bride, Its President



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November 15, 2021

VIA ELECTRONIC FILING

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101

Re: *In the Matter of the Petition by CenterPoint Energy for Approval of a Rate Stabilization Plan*
MPUC Docket No. G-008/M-21-755

Dear Mr. Seuffert:

On behalf of the Suburban Rate Authority, attached for filing in the above-referenced docket please find the Reply Comments of the Suburban Rate Authority. This document has been served on the parties on the attached Service List. A Certificate of Service is also attached.

Very truly yours,

KENNEDY & GRAVEN, CHARTERED

/s/ James M. Strommen

James M. Strommen

Attachment

cc: Service List

Re: *In the Matter of the Petition by CenterPoint Energy for Approval of a Rate Stabilization Plan*
MPUC Docket No. G-008/M-21-755

CERTIFICATE OF SERVICE

I, Lisa Larson, hereby certify that I have this day served copies of the following document:

Reply Comments of the Suburban Rate Authority

on:

the list of persons on the attached Service List

by electronic filing and serving in the e-Dockets system, and/or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at Minneapolis, Minnesota.

Dated this 15th day of November, 2021.

/s/ Lisa Larson _____
Lisa Larson

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