



505 Nicollet Mall  
PO Box 59038  
Minneapolis, MN 55459-0038

August 26, 2025

**via eFiling**

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

**Re: In the Matter of CenterPoint Energy Minnesota Gas 2024 Gas Affordability Program  
(GAP) Report  
Docket No. G-008/M-25-38  
Reply Comments**

Dear Mr. Bull:

CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or the "Company") respectfully submits these Reply Comments in response to the Comments of the Minnesota Department of Commerce ("Department"), filed on August 12, 2025, in this docket.

The Company thanks the Department for their analysis of our Report. The Company will address their recommendations in these Reply Comments.

Sincerely,

*/s/ Emily Suppes*

Director, Regulatory Affairs

Attachments

C: Service List

**STATE OF MINNESOTA**  
**BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**  
121 Seventh Place East, Suite 350  
St. Paul, MN 55101-2147

Katie Sieben  
Joseph Sullivan  
Audrey Partridge  
Hwikwon Ham  
John Tuma

Chair  
Commissioner  
Commissioner  
Commissioner  
Commissioner

In the Matter of CenterPoint Energy  
Minnesota Gas 2024 Gas Affordability  
Program (GAP) Report

Docket No. G-008/M-25-38

**REPLY COMMENTS**

**Introduction**

CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas (“CenterPoint Energy” or the “Company”) respectfully submits these Reply Comments in response to the Comments of the Minnesota Department of Commerce (“Department”) filed on August 12, 2025, in this docket. The Company addresses the recommendations in this filing below.

The three topic areas opened within the July 15 Commission’s Notice and which the Department provided its analysis of CenterPoint Energy’s GAP program:

- Should the Commission accept CenterPoint Energy’s 2024 Gas Affordability Program (GAP) annual reports?
- Should CenterPoint Energy allow customers to make up missed payments to be placed back on GAP?
- Are there other issues or concerns related to this matter?

The Department recommends that CenterPoint Energy submit additional documentation before the Commission accepts the Company’s annual Report and further recommends additional reporting items for next year.

**Response to the Department’s Recommendations:**

The Department concluded that the Company’s filing of its annual information is complete. However, the Department suggests in their Comments the following recommendations:

1. Once Docket No. 25-281 is completed, CenterPoint Energy revises their GAP tariff sheets to conform with the 2025 law and Commission Order.
2. Submit the following documentation in its reply comment to assist the Department in confirming compliance with Order Point 13:
  - a. Verification on whether the tariff book authorizes customers to join GAP in the same year that they originally opted out of the program.
  - b. Include the actual one-time mailing for item a, the mailing to approve customers as required in b, and the final notice that customers must reapply for LIHEAP by May 1 to remain eligible in each subsequent year as in item c.
3. The Commission require CenterPoint Energy to describe the firewall that partitions and limits non-public information that is used for customers percentage-of-income payments.
4. CenterPoint Energy must monitor monthly spending from and income to the GAP program. If, and when, the program is on track to deplete its tracker balance within 6 months, CenterPoint Energy shall make a filing with the Commission that includes, at a minimum:
  - a. Tracker balance, income, and spending on a monthly basis for the previous 6 months and projected 6 months in the future;
  - b. An evaluation of possible modifications to avoid closure of the program, including modifying the affordability benefit and arrearage forgiveness benefit amounts for participants, changing the program funding level/surcharge, and other options the Company has considered; and
  - c. A proposal to avoid the projected negative tracker balance.
5. Should CenterPoint Energy allow customers to make up missed payments to be placed back on GAP?
  - The Departments two alternative recommendations:
    - a. allow customers to reenroll in GAP after 2 months of removals due to nonpayment;
    - b. allow CNP one to two years of experience with auto-enrollment before considering whether to reenroll customers removed from GAP for nonpayment.
6. To help inform the Department and the Commission on opportunities to enroll more eligible customers on GAP during the winter months, the Department asks for the following:
  - Continued monthly counts of the number of CenterPoint Energy's customers on GAP;
  - Clarification of Table 20, the "number of LIHEAP customers";
  - Monthly number of customers on LIHEAP from January 2018;

- Monthly average per customer costs for the affordability credit and arrearage forgiveness from January 2018; For all monthly statistics above, document the date that the data represent (e.g. end of month);
- Explanation of steps and approximate timeline in processing a customer onto GAP that receives LIHEAP; and
- Explanation of whether CenterPoint Energy can start enrolling customers onto GAP immediately after customers qualify for LIHEAP.

7. CenterPoint Energy will publish definitions and explanations of methodologies in a separate attachment.

The Company agrees with the Department's item one to update the GAP tariff sheets to conform with the new 2025 law once Docket No. 25-281 is complete.

Regarding the Department's recommendation on item two for submitting documentation in confirming compliance with Order Point 13, the Company confirms if a customer opts out of joining GAP during the automatic enrollment onboarding process, then they can go on at a later point in time because they are not officially joining the program. To get a sense of scale, in 2024, 99 customers opted out of GAP automatic enrollment. The Company believes the current tariff supports this company practice.

Additionally, the Company has attached copies of our mailings: Attachment 1 GAP Acceptance Letter which is sent when a customer is enrolled in GAP. Attachment 2 GAP Explanation of Charges Letter sent to customers to show the breakdown of charges. Lastly, we have Attachment 3 the 30-day Final Notice that is sent on February 1<sup>st</sup> and Attachment 4 the 60-day letter that is sent on January 1<sup>st</sup>.

Regarding the Department's recommendation for item 3 and the Company's firewall:

- CenterPoint Energy is using Palo Alto next generation Firewalls. They provide application/user/content identification, threat prevention and full stack visibility in addition to stateful packet inspection.
- The Palo Alto Firewall logs are forwarded to the Splunk SIEM for security monitoring.
- All customer data is firewall protected.

The Company agrees with the Department's item 4 and continues to monitor monthly spending from and income to the GAP program. If, and when, the program is on track to deplete its tracker balance within 6 months, the Company will make a filing with the Commission that includes the tracker balance, income and spending monthly for the previous 6 months and projected 6 months in the future. Additionally, the filing will have an evaluation of possible modifications to avoid closure of the program, including modifying the affordability benefit and arrearage forgiveness benefit amounts for the participants, changing the program funding level/surcharge, and other options the Company has considered and a proposal to avoid the projected negative tracker balance. The Company is seeing positive participation rates since implementing the modifications of the GAP program in 2024 to providing more energy cost assistance to our income qualified customers. As the Company continues to monitor the monthly spending, we are working to understand the impacts of autoenrollment. We recognize that winter recovery is different from our summer recovery. The Company will stay in compliance and provide updates if anything changes.

The Company appreciates the Department's alternative recommendation for item 5 b, since there will be more information and data to analyze from running the program over the next couple of years. The Company will consider whether to reenroll customers removed from GAP for nonpayment in our annual status report to be filed in 2027. CenterPoint Energy is excited about the positive impact of increased levels of customers joining the program due to automatic enrollment and want to understand program trends based of the current program changes before making any more additional ones.

The Company has had discussions with the Consumer Affairs Office ("CAO") regarding the GAP program terms for customers who are removed from GAP for non-payment. The CAO suggested CenterPoint Energy modify its program to allow customers to make up the missed payments to be placed back on GAP. CenterPoint Energy has not historically had this practice. With the 2024 GAP program year changes, the company would like to take this suggestion under consideration as it reviews the current program changes with autoenrollment, along with the current tracker balance, hoping to review in the 2025 annual GAP filing.

Regarding the Department's recommendations for item 6, the Company will continue to provide monthly counts of the number of customers on GAP as provided in our annual and quarterly status reports. The total monthly amounts of LIHEAP customers in Table 20 of our annual status report are received from the Department. An electronic file is sent to the Company weekly when LIHEAP commitments are made, and the application is approved. The Company then begins the process to enroll those customers on GAP during our current autoenrollment process. Once a customer is enrolled, onboarding process starts for GAP and the opt out option is offered upon receipt of the enrollment letter.

**Table 20. LIHEAP Customers<sup>1</sup>**

	Jan.	Feb.	Mar.	Apr.	May	June	July	Aug.	Sept.	Oct.	Nov.	Dec.
<b>2025</b>	2906	2449	2411	1842	1568							
<b>2024</b>	3321	2903	2265	1956	1483	885	131	2	1	1	8659	3240
<b>2023</b>	2519	3007	3622	2355	2877	2134	1076	74	2	0	8622	3775
<b>2022</b>	2773	2577	2958	2512	2201	2221	1380	314	438	1	6273	2823
<b>2021</b>	2694	1958	1812	1713	935	851	861	1092	946	2662	2454	3102
<b>2020</b>	4247	2658	1586	934	763	800	1116	23	-	1	6425	3921
<b>2019</b>	3784	1797	1685	1712	1482	649	98	-	-	3	7780	3328
<b>2018</b>	2119	2616	2127	1658	1543	647	100	-	-	4	10115	3961

<sup>1</sup> Table 20. 2018 monthly LIHEAP Customers. Docket G-008/M-25-38; G-008/M-24-38

**Table 1. GAP Participant LIHEAP<sup>2, 3</sup>**

	<b>GAP Year</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
<b>1</b>	GAP participants who received LIHEAP (October prior year through September current year)	6,988	8,237	5,696	6,252	5,431	5,302	10,503
<b>2</b>	LIHEAP received by GAP participants	\$2,795,147	\$3,217,831	\$2,032,067	\$2,423,777	\$ 3,522,007	\$1,937,816	\$3,730,199
<b>3</b>	Average amount (line 2 divided by line 1)	\$400	\$391	\$357	\$388	\$649	\$365	\$355
<b>4</b>	GAP participants who received LIHEAP (October current year through September subsequent year)	7,246	5,828	6,055	5,092	4,641	5,485	9,987
<b>5</b>	LIHEAP received by GAP participants	\$2,866,176	\$2,082,198	\$2,358,885	\$3,432,064	\$1,696,617	\$1,989,688	\$3,664,460
<b>6</b>	Average amount (line 5 divided by line 4)	\$396	\$357	\$390	\$674	\$366	\$363	\$367
<b>7</b>	Total incremental LIHEAP (line 5 minus line 2)	\$71,029	-1,135,633	\$326,818	\$1,008,287	-\$1,825,389	\$51,872	-\$65,739
<b>8</b>	Average incremental LIHEAP (line 6 minus line 3)	-\$4	-\$33	\$33	\$286	-\$283	-\$3	\$12

The Company was not able to receive clarification from the Department to the Company's questions on the last recommendation prior to submitting these reply comments. CenterPoint Energy understands the request for transparency in the definitions and explanations of methodologies used in this docket yet is unsure of the particular information requested in item 7.

<sup>2</sup> Table 1. 2018-2024 GAP Participant LIHEAP. Due to formatting not displayed on 2025 GAP Status Report. Docket G-008/M-25-38; G-008/M-24-38

<sup>3</sup> Note that the 2024 GAP year has 14 months of Data compared to other years

The Company appreciates the Department's review and recommendation and agrees that the Commission should accept CenterPoint Energy's GAP Compliance Filing.

**I. Conclusion**

The Company appreciates the opportunity to respond to the Comments of the Department. As discussed above, the Company agrees with the Department's recommendations to accept the Company's 2024 GAP Report.

CENTERPOINT ENERGY  
P.O. BOX 1144  
MINNEAPOLIS MN 55440-1144

November 7, 2023

RE: Gas Affordability Program Acceptance  
Account: [REDACTED]  
Service address: [REDACTED]

Dear [REDACTED],

We are pleased to inform you that you have been accepted into CenterPoint Energy's Gas Affordability Program (GAP). If you are currently on a payment plan, you will receive a bill within the next week that discontinues your existing payment plans. Please continue to pay your current monthly plan amount until you receive your first GAP bill. This GAP bill will show your credit and monthly payment amounts.

**To stay on the program, you agree to:**

1. Make your full monthly payments. If you miss two consecutive monthly payments, you will be removed from the program. If removed, you will no longer receive program credits and your past due balance will become due. Collection activities will begin and your gas services could be shut off.
2. Notify us of any change to your household income or if you move. These changes may affect your program credit amounts. You may still be eligible for GAP even if your income changes or if you move.

If you continue to make your monthly payments, you will remain on the Gas Affordability Program through the end of the program year.

Please contact us at **612-372-4727** or **1-800-245-2377**, if you have any questions about this program.

Sincerely,

CenterPoint Energy  
612-372-4727  
[www.CenterPointEnergy.com](http://www.CenterPointEnergy.com)

*\*GAP is offered under the Gas Affordability Service Program tariff and is subject to annual regulatory review by the Minnesota Public Utilities Commission.*

[REDACTED]



CENTERPOINT ENERGY  
P.O. BOX 1144  
MINNEAPOLIS MN 55440-1144

December 5, 2023

RE: First Gas Affordability Program Bill  
Account: [REDACTED]  
Service address: [REDACTED]

Dear [REDACTED],

We recently sent you your first Gas Affordability Program (GAP) bill. This program will help you lower your natural gas bill and if you have a past due balance, it will help you pay it off more quickly.

To stay on the program, you'll need to pay \$[REDACTED] each month. This amount is a combination of a flat payment amount of \$[REDACTED] for your monthly bill and a monthly payment on your past due balance of \$[REDACTED]. Due to your participation in the program, you are receiving a \$[REDACTED] credit each month, which you will continue to receive as long as you are in the GAP program.

**To stay on the program and receive your monthly credits, you agree to:**

1. Make your full monthly payments. If you miss two consecutive monthly payments, you will be removed from the program. If removed, you will no longer receive program credits and your past due balance will become due. Collection activities will begin and your gas services could be shut off.
2. Notify us of any change to your household income or if you move. These changes may affect your program credit amounts. You may still be eligible for GAP even if your income changes or if you move.

If you stay in the program, CenterPoint Energy will also not shut off your natural gas service during the program year.

● **How your monthly credits are calculated:**

- Monthly natural gas charges. This amount was estimated based on your annual natural gas costs divided by 12 months. Your gas charges were then averaged to provide the same flat monthly bill amount for current charges.
- Past due balance. We applied your Energy Assistance grant to your past due balance. We set-up a GAP Installment Plan for the past due balance remaining to help you pay off your past due bill over 12 months. Each month that you remain on the GAP program an additional program credit will be applied to your past due balance.

[REDACTED]

Please contact us at **612-372-4727** or **1-800-245-2377**, if you have any questions about this program.

The CenterPoint Energy Credit and Collections team  
CenterPointEnergy.com

*\*GAP is offered under the Gas Affordability Service Program tariff and is subject to annual regulatory review by the Minnesota Public Utilities Commission.*





PO Box 1165  
Minneapolis, MN 55459-1165

Customer name  
Address  
City, State, ZIP

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## FINAL NOTICE

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### Important Gas Affordability Program information

Thank you for participating in the Gas Affordability Program (GAP). In order to remain in the program, you must be approved for Energy Assistance for the current program year.

Energy Assistance began accepting applications on Oct. 1, 2024. You will need to submit an application for the current heating season, if you have not done so already. For help finding your local Energy Assistance Program provider, call 800-657-3710, or visit [mn.gov/home](https://mn.gov/home) to apply online.

If CenterPoint Energy receives a payment from Energy Assistance on your account before or on March 4, 2025, you will be automatically enrolled in 2025-26 GAP. We will send you a letter confirming your re-enrollment in the program.

### Unable to apply for Energy Assistance?

If CenterPoint does not receive an Energy Assistance payment by March 4, 2025, you will be removed from GAP and will no longer receive the GAP discount. If this happens, contact us and we will work together to set up a payment plan on any past due balances. You can still re-enroll in GAP by applying for and receiving an Energy Assistance payment this season.

### We are here to help.

If you have any questions or concerns, please call our Customer Service team at **612-372-4727 or 800-245-2377**.



PO Box 1165  
Minneapolis, MN 55440-1165



PO Box 1165  
Minneapolis, MN 55459-1165

Customer name  
Address  
City, State, ZIP

## Important Gas Affordability Program information

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Energy Assistance began accepting applications on Oct. 1, 2023. You will need to submit an application for the current heating season, if you have not done so already. For help finding your local Energy Assistance Program provider, call 800-657-3710, or visit [mn.gov/home](https://mn.gov/home) to apply online.

If CenterPoint Energy receives a payment from Energy Assistance on your account before or on March 1, 2024, you will be automatically enrolled in 2024-25 GAP. We will send you a letter confirming your re-enrollment in the program.

### Unable to apply for Energy Assistance?

If CenterPoint does not receive an Energy Assistance payment by March 1, 2024, you will be removed from GAP and will no longer receive the GAP discount. If this happens, contact us and we will work together to set up a payment plan on any past due balances. You can still re-enroll in GAP by applying for and receiving an Energy Assistance payment this season.

### We are here to help.

If you have any questions or concerns, please call our Customer Service team at **612-372-4727 or 800-245-2377**.



PO Box 1165  
Minneapolis, MN 55440-1165

## CERTIFICATE OF SERVICE

I, Christina Benning, certify that on Tuesday, August 26, 2025, I served the attached Reply Comments of CenterPoint Energy in Docket No. G-008/M-25-38 to all persons at the addresses indicated on the attached service list by having the document delivered via electronic filing.

/s/ Christina Benning

Senior Regulatory Paralegal  
CenterPoint Energy

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-38
2	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	M-25-38
3	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-38
4	Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 St. Paul MN, 55101 United States	Electronic Service		No	M-25-38
5	Ron	Elwood	relwood@mnlisap.org	Legal Services Advocacy Project		970 Raymond Avenue Suite G-40 Saint Paul MN, 55114 United States	Electronic Service		No	M-25-38
6	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	M-25-38
7	Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	M-25-38
8	Chris	Osowski	chris_osowski@usc.salvationarmy.org	Salvation Army		2080 Woodlynn Avenue Maplewood MN, 55109 United States	Electronic Service		No	M-25-38
9	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	M-25-38
10	Emily	Suppes	emily.suppes@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-38