



November 10, 2021

**VIA ELECTRONIC FILING**

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, Minnesota 55101-2147

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

Dear Mr. Sueffert:

Please find the attached Comments of the Energy CENTS Coalition in the above-referenced matter. If you have questions about these comments, please call me at 651-470-4500.

Sincerely,

*Pam Marshall*

Executive Director  
Energy CENTS Coalition

**State of Minnesota  
Before the Public Utilities Commission**

Katie Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

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

**Docket No. G-008/M-21-435**

The Energy CENTS Coalition (“ECC”) appreciates the opportunity to comment on CenterPoint Energy’s (“CPE” or “the Company”) Rate Stabilization Plan. For the reasons outlined below, ECC believes that the Company’s proposed plan is in the public interest and respectfully requests that the Commission approve the plan as filed.

Residential ratepayers, particularly lower-income ratepayers, are experiencing economic hardship caused by the pandemic. At the same time, prices for food, gasoline, and other consumer goods are increasing. Further, most CPE residential customers are currently paying for the costs of the February 2021 natural gas price spike.

Further, *fourteen percent* (114,790) of CPE residential customers were past-due last July. That number dropped to 82,152 in September, primarily due to less natural gas usage in the summer, reflected in lower monthly bill amounts (\$22-24). As of September, nearly 10% of all residential customers were behind on their CPE bill.<sup>1</sup>

Residential customers need urgent protection, particularly as the beginning of the heating season coincides with a projected increase in the commodity cost of gas. According to the U.S. Energy Information Administration, “nearly half of U.S. households that heat primarily with natural gas will spend 30% more than they spent last winter on average—50% more if the winter is 10% colder-than-average and 22% more if the winter is 10% warmer-than-average.”<sup>2</sup>

The Company’s Stabilization Plan represents an important part of increasing customers’ ability to pay for natural gas bills. Under the Plan, rather than experiencing a potential 6.5% rate increase, the proposal limits the increase to 3.9% (\$67.1 million in the rate case to \$39.7 million in the Stabilization Plan). Under the plan, customers will pay an additional \$2.83 per month rather than the rate case increase of \$4.05 per month.

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<sup>1</sup> CenterPoint Energy Monthly Report, Docket No. 20-375, September 21, 2021.

<sup>2</sup> U.S. Energy Information Administration, Short-Term Energy Outlook, October 13, 2021.

In addition, CPE's proposal extends the extraordinary cost-recovery period from 27 to 63 months, lowering the monthly payment amount from \$12.83 in 2022 and \$17.62 in 2023 to \$7.44 for both years. At the same time, the exemptions (for LIHEAP and customers past due 61-120 days) will continue.<sup>3</sup>

For a number of reasons, ECC believes that CPE's proposal to recover \$39.7 million for capital investments is reasonable. First, CPE's investments were reviewed in a recent rate case and new rates have only been in effect since 2021. Second, the Company's primary capital expenses involve investment in distribution and transmission pipeline safety. Third, the Company is only requesting capital investment recovery in the stabilization plan and does not seek amortization of property taxes.

Given the confluence of current economic circumstances, consumer price increases, and the projected increase in the commodity cost of gas, ECC is very concerned that the number of CPE past-due customers will increase and that a significant percentage of the Company's residential customers will be at risk for service disconnections at the end of the current Cold Weather Rule period. Therefore, ECC respectfully recommends the Commission approve CPE's Stabilization Plan.

Respectfully submitted,

November 10, 2021



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Pam Marshall  
Energy CENTS Coalition

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<sup>3</sup> Order Granting Variances and Modified Cost Recovery Subject to Prudence Reviews, Docket No. 21-138, August 30, 2021.

AFFIDAVIT OF SERVICE

Pam Marshall certifies that on the 10th day of November 2021, she served, by electronic filing, Comments on behalf of the Energy CENTS Coalition in the Matter of the Petition by CenterPoint Energy For Approval of a Rate Stabilization Plan, DOCKET NO. G-008/GR-21-755, to the individuals on the attached service list.

*Pam Marshall*

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Pam Marshall

*KMS*

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Kristen Syverud

Subscribed and sworn to before me  
this 10th day of November 2021



Notary Public

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck, ND 585014092	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Jorge	Alonso	jorge.alonso@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Andrew	Bahn	Andrew.Bahn@state.mn.us	Public Utilities Commission	121 7th Place E., Suite 350  St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Carolyn	Berninger	cberninger@mncenter.org	Minnesota Center for Environmental Advocacy	26 E Exchange St Ste 206  Saint Paul, MN 55101	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Brenda A.	Bjorklund	brenda.bjorklund@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Jason	Bonnett	jason.bonnett@state.mn.us	Public Utilities Commission	121 East 7th Place suite 350  St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-524_GR-19-524 Official CC Service List
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Steve W.	Chriss	Stephen.chriss@walmart.com	Wal-Mart	2001 SE 10th St.  Bentonville, AR 72716-5530	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-524_GR-19-524 Official CC Service List
Dean	Dalzell	ddalzell@caphennepin.org	Community Action Partnership of Hennepin County	8800 Highway 7 Ste 401  St. Louis Park, MN 55426	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Richard	Dornfeld	Richard.Dornfeld@ag.state.mn.us	Office of the Attorney General-DOC	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul, Minnesota 55101	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
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Eric	Lindberg	elindberg@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Avenue West Suite 515 Saint Paul, MN 55104-3435	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	Yes	OFF_SL_19-524_GR-19-524 Official CC Service List
Michael	Loeffler	mike.loeffler@nngco.com	Northern Natural Gas Co.	CORP HQ, 714 1111 So. 103rd Street Omaha, NE 681241000	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
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Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List



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Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
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_19-524_GR-19-524 Official CC Service List
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