



505 Nicollet Mall
P.O. Box 59038
Minneapolis, MN 55402

Via E-filing

April 30, 2015

Mr. Dan Wolf, Executive Secretary
Minnesota Public Utilities Commission
121 East Seventh Place, Suite 350
St. Paul, MN 55101

**Re: Petition of CenterPoint Energy for approval of a continued variance from Minnesota Rule 7820.5300 DETERMINATION OF DELINQUENCY related to customer-selected due dates.
G-008/M-15-_____**

Dear Mr. Wolf:

CenterPoint Energy offers its customer a payment plan, currently called Automatic Bank Draft, which allows customers to select the date when funds are to be withdrawn from their checking or savings account to pay their CenterPoint Energy bill. The date of withdrawal will be printed on the bill as the due date, which could result in a due date printed on a customer bill that, in some cases, will be more than five days before the next scheduled billing date, which is contrary to Minnesota Rule 7820.5300. CenterPoint Energy received a six year variance on September 8, 2009 in Docket G-008/M-009-769 from the Rule as it relates to the Automatic Bank Draft program. In this filing, CenterPoint Energy is requesting another six year variance.

CenterPoint Energy requests Commission approval of this petition pursuant to Minnesota Rule 7829.0100, Sup. 11, **Miscellaneous tariff filing**. The information required under the Rules of Practice and Procedure, Minnesota Rule 7829.1300 is also included.

The following pages describe in detail CenterPoint Energy's petition. If you have any questions or require additional information, please contact me at (612) 321-5078.

Sincerely,
/s/
Marie Doyle

Attachment
cc: General Service List

**PETITION OF CENTERPOINT ENERGY MINNESOTA GAS FOR APPROVAL OF A
VARIANCE FROM MINNESOTA RULES RELATED TO ITS AUTOMATIC BANK
DRAFT PLAN**

This Petition is filed pursuant to Minnesota Stat. § 216B.08. The information required by Minnesota Rule 7829.1300 is as follows:

7829.1300 MISCELLANEOUS TARIFF AND PRICE LIST FILINGS

Subpart 1. Summary

This petition requests Minnesota Public Utilities Commission approval of a continued variance from Minnesota Rules related to the printing of Due Dates on customer bills. CenterPoint Energy offers customers a payment plan called Automatic Bank Draft. This plan allows customers to select the date when funds are withdrawn from their account to pay their CenterPoint Energy bill. The date of withdrawal is printed on their bill as the Due Date, which could result in a due date printed on a customer bill that, in some cases, is more than five days before the next scheduled billing date, which is contrary to Minnesota Rule 7820.5300, subpart 2.

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Subpart 2. Service

Copies of this petition have been served electronically on the Public Utilities Commission, the Office of the Attorney General – Residential Utilities and Antitrust Division, and the Department of Commerce.

Pursuant to Minnesota Rule 7829.1300, CenterPoint Energy has served the summary shown above in subpart 1, on person on the applicable general service list.

CenterPoint Energy has served a copy of its general service list for this filing on all of the above.

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Subpart 3. Content of filing not subject to specific filing rules.

A. Name, address, and phone number of the utility:

CenterPoint Energy Minnesota Gas, A Division of CenterPoint Energy Resources Corp., a Delaware Corporation
505 Nicollet Mall
P.O. Box 59038
Minneapolis, MN, 55402
(612) 372-4664

B. Name, address, and phone number of the attorney for the utility:

Brenda A. Bjorklund
CenterPoint Energy Minnesota Gas, A Division of CenterPoint Energy Resources Corp.
505 Nicollet Mall
P.O. Box 59038
Minneapolis, MN, 55402
(612) 321-4976

C. Date of Filing: April 30, 2015
Proposed Effective Date: No later than September 8, 2015; this is the date the current variance will end.

D. Timeframe for processing this filing is not governed by any statute.

E. Signature and title of the utility representative responsible for the filing:

/s/

Marie Doyle
Regulatory Services
CenterPoint Energy

F. A description of the filing, its impact on rates and services, its impact on the utility and affected ratepayers, and the reasons for the filing can be found on pages 4 through 6 of this filing.

PETITION OF CENTERPOINT ENERGY MINNESOTA GAS FOR APPROVAL OF A VARIANCE FROM MINNESOTA RULES RELATED TO ITS AUTOMATIC BANK DRAFT PLAN

Background

CenterPoint Energy is requesting the same variance as was authorized in 2005, for four years, and, most recently in 2009, for another six years. On December 12, 2005 and again on September 8, 2009, the Minnesota Public Utilities Commission approved CenterPoint Energy's Petition for a variance from Minnesota Rule, 7820.5300, part 2, related to the printing of Due Dates on customer bills in Docket No.G-008/M-05-603. In those Orders, the Commission approved a variance from Minnesota Rule 7820.5300, subp.2 and required CenterPoint Energy to submit an annual compliance filing showing:

- The total number of customers participating in the Automatic Bank Draft program;
- The number of customers who choose a due date greater than five days from their billing date;
- How many customers drop off the Automatic Bank Draft program annually and the reasons for their departure;
- Number and nature of complaints received each year regarding the Automatic Bank Draft program.

CenterPoint Energy has filed the required annual reports each January. The latest annual report, filed January 27, 2015 in docket G008/M-09-769 shows 211,818 participants in the Automatic Bank Draft program with 29,248 participants selecting a due date greater than five days from their billing date.

VARIANCE REQUEST

Customer Selected Due Dates

CenterPoint Energy offers a program, currently called Automatic Bank Draft¹ which allows customers to select the date when funds are to be withdrawn from their checking or savings account to pay their CenterPoint Energy bill.

The date of withdrawal is printed on the bill as the due date, which could result in a due date printed on a customer bill that, in some cases, will be more than five days before the next scheduled billing date, which is contrary to Minnesota Rule 7820.5300 **DETERMINATION OF DELIQUENCY**. CenterPoint Energy requests a six year variance from this rule for customers on the Automatic Bank Draft/AutoPay program choosing to participate in the Automatic Bank Draft Program who have also chosen their withdrawal date. Pursuant to Minnesota Rule 7820.5300, subpart 2, CenterPoint Energy will not assess a late payment charge on these accounts until the customer's next billing date.

¹ The Company noted in its request to update its bill format (Docket G008/M-14-753) that the program is soon to be renamed AutoPay.

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CenterPoint Energy is requesting a six year variance in order to be consistent with the prior request. CenterPoint Energy notes that this is a customer payment choice program which continues to grow and that there have been few complaints noted concerning this program.

CenterPoint Energy proposes to continue to file an annual report concerning its Automatic Bank Draft program. The report will include the same information as requested in Dockets No. G-008/M-05-603 and No. G-008/M-09-769.

Minnesota Rules 7829.3200 OTHER VARIANCES

Minnesota Rules 7829.3200 OTHER VARIANCES states that a Rule may be varied if three conditions are addressed to the satisfaction of the Commission. These three conditions are:

1. Enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule

Enforcement of the rule imposes an excessive burden on customers since printing a Withdrawal Date and a Due Date on bills would be confusing. This would also pose a burden on CenterPoint Energy for programming costs related to changing the CCS billing system to display both a Withdrawal Date and Due Date.

2. Granting the variance would not adversely affect the public interest

Granting of the proposed variance request would not adversely affect the public interest since this is a voluntary program. If a customer has chosen a due date, the customer has thereby consented to a due date that might be more than 5 days before the customer's next billing date. However, and more importantly, there is no change to when CenterPoint Energy will impose late payment charges. Thus, the true intent of the rule is not diminished.

3. Granting the variance would not conflict with standards imposed by law

CenterPoint Energy is not aware of any laws that would be violated by granting this variance.

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Conclusion:

For all of the above reasons, CenterPoint Energy respectfully requests that the Commission issue an Order approving a six year variance under and to Minnesota Rule 7829.3200, Subp. 2, thereby allowing CenterPoint Energy to continue to offer, in its current format, its Automatic Bank Draft / AutoPay program.

/s/

Marie Doyle
Regulatory Services
CenterPoint Energy

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