

## Staff Briefing Papers

Meeting Date January 28, 2021 Agenda Item 3\*

Company CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas (CenterPoint Energy)

Docket No. **G-008/M-20-838**

**In the Matter of a Petition of CenterPoint Energy for Approval of a Variance to Minnesota Rule 7825.2700, subp. 8 Regarding Supplier (Pipeline) Refunds**

Issues Should the Commission approve CenterPoint Energy’s proposed refund plan and grant CenterPoint Energy a variance to Minn. R. 7825.2700, subp. 8 to allow CenterPoint Energy to (1) determine the refund amount for each customer based on their actual usage from January through April 2020, instead of on a 12-month basis, and (2) make the refund more than 90 days after receipt?

Staff	Sundra Bender	<a href="mailto:sundra.bender@state.mn.us">sundra.bender@state.mn.us</a>	651-201-2247
	Godwin Ubani	<a href="mailto:godwin.ubani@state.mn.us">godwin.ubani@state.mn.us</a>	651-201-2191

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 **Relevant Documents**

**Date**

CenterPoint Energy – Petition	November 23, 2020
Department of Commerce – Comments	December 18, 2020
CenterPoint Energy – Reply Comments	December 28, 2020
Department of Commerce – Supplemental Comments	January 4, 2021
CenterPoint Energy – Supplemental Reply Comments	January 5, 2021

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The attached materials are work papers of the Commission Staff. They are intended for use by the Public Utilities Commission and are based upon information already in the record unless noted otherwise.

## I. Statement of the Issues

Should the Commission approve CenterPoint Energy's (CenterPoint Energy, CenterPoint, or the Company) proposed refund plan and grant CenterPoint Energy a variance to Minn. R. 7825.2700, subp. 8 to allow CenterPoint Energy to (1) determine the refund amount for each customer based on their actual usage from January through April 2020, instead of on a 12-month basis, and (2) make the refund more than 90 days after receipt?

## II. Background

On July 31, 2019, Viking Gas Transmission (Viking or VGT) requested an increase to its rates, from the Federal Energy Regulatory Commission (FERC), beginning January 1, 2020 and was allowed to implement the increase in rates subject to refund. CenterPoint stated:

A settlement was reached by Viking shippers in February 2020, and the Federal Energy Regulatory Commission (FERC) allowed Viking to implement the agreed upon final rates prior to formal approval. Therefore, beginning in March 2020, rates billed matched the final approved rates. FERC approved the settlement on July 1, 2020 and ordered refunds of the difference between rates collected and final settlement for January and February, which the Company received in August 2020.<sup>1</sup>

Similarly, CenterPoint received refunds from Northern Natural related to the settlement of its rate case. CenterPoint stated:

Likewise, [Northern Natural Gas (Northern or NNG)] proposed a rate increase in 2019<sup>2</sup> and billed shippers the proposed rates from January to April 2020 subject to refund. NNG and shippers reached a settlement in April 2020, and FERC allowed NNG to update its billed rates beginning in May 2020 to the final rates while awaiting formal FERC approval. CenterPoint Energy paid the increased rates as required, adjusting the purchased gas rates it passed through to its customers to reflect the increases and subsequent decreases. The refunds reflect dollars returned to CenterPoint Energy in October that need to be returned to its sales service customers. Northern made two refunds – one reflecting the contracted entitlement, and the other reflecting volumetric charges on CenterPoint Energy gas deliveries to sales customers. The size of the refunds in total exceeds the \$5 per customer threshold that the rule anticipates, and therefore starts the clock requiring a 90-day refund deadline. CenterPoint Energy is accruing interest on the balance at the prime rate.

On November 23, 2020, CenterPoint Energy submitted its Petition requesting approval of a variance to Minnesota Rule 7825.2700, subpart 8, Refunds, that requires the company to

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<sup>1</sup> FERC Docket No. RP19-1340-005, issued July 1, 2020. Refund with interest \$130,282.

<sup>2</sup> FERC Docket Nos. RP19-1353 and RP19-59. Two separate refunds-total with interest: \$7,627,578.

refund supplier pipeline charges based on individual customer's use over the latest 12 months of use. Further, CenterPoint Energy seeks a variance to the 90-day refund requirement for amounts greater than \$5 per customer if Commission approval extends beyond the 90-day deadline requirement for issuing such refunds.

On December 18, 2020, the Department of Commerce, Division of Energy Resources (Department), submitted comments. The Department recommended that the Commission:

- (1) Grant a variance and allow the Company to calculate the refund per unit amount using 4 months of actual usage rather than the 12 months required by Minn. R. 7825.2700, subp. 8, and
- (2) Require CenterPoint to report on the status of the refund after it is completed and to provide a reconciliation of its disbursement. Further, the Department indicated it would provide supplemental comments and additional recommendations regarding CenterPoint's request once it has had the opportunity to review the information the Department asked the Company to provide in Reply Comments.

On December 28, 2020, CenterPoint Energy submitted Reply Comments and indicated that it supports the recommendations in the Department's analysis and confirms it will provide a full accounting of refund amounts, interest accrued and disbursement in a compliance filing after the refunds are processed.

On January 4, 2021, the Department submitted Supplemental Comments in which it recommended that the Commission:

- approve the Company's proposed refund amount and interest calculations.
- approve CenterPoint's calculation of the refund amount per unit and allocation to customer classes.
- approve the Company's proposal to provide a bill credit to all customers who have active accounts as of the date of the refund.
- approve the Company's requested variance to Minn. R. 7825.2700, subp. 8 relating to the use of 4 months of customer data to determine the refund per unit amount.
- approve the Company's requested variance to Minn. R. 7825.2700, subp. 8 that would allow CenterPoint more than 90 days to provide the refund discussed in CenterPoint's Reply Comments.
- require CenterPoint to report on the status and provide a reconciliation of the refund's disbursement.

On January 5, 2021, CenterPoint Energy submitted Supplemental Reply Comments in which it supported the recommendations outlined in the Department's analysis and confirmed it will provide a reconciliation of the refunds in a subsequent compliance filing after the refunds are processed.

### III. Minn. R. 7825.2700, subp. 8. Refunds.

Minn. R. 7825.2700, subp. 8 describes the process required for returning a natural gas supplier or transporter refund to ratepayers.

Refunds and interest on the refunds, that are received from the suppliers or transporters of purchased gas and attributable to the cost of gas previously sold, must be annually refunded by credits to bills, except that cumulative refund amounts equal to or greater than \$5 per customer must be refunded within 90 days from the date the refund is received from a supplier or transporter. Refunds must be allocated to customer classes in proportion to previously charged costs of purchased gas. Within classes, the refund amount per unit must be applied to bills based on individual 12-month usage. The utility shall add interest to the unrefunded balance at the prime interest rate.

### IV. Parties' Comments

#### A. CenterPoint Energy's Petition

##### 1. CenterPoint Energy's Proposal

CenterPoint proposes to:

- combine the NNG (\$7,627,578) and Viking (\$130,282) refunds into one credit per active customer;
- Refund the amounts to customer accounts in mid to late January 2021 if Commission approval is received in time;
- Determine what amount to refund per customer using their actual usage from January to April 2020;
- Accrue interest on the balance at the prime rate; and
- Provide refunds only to sales customers.

In its Petition, CenterPoint Energy requested a variance to Minn. R. 7825.2700, subp. 8, Refunds, that requires the company to refund supplier pipeline charges based on individual 12-month usage. CenterPoint Energy plans to refund the dollars and seeks to use a shorter-than-12-month usage total to more appropriately match dollars to customers. "The refund would be assigned to sales service customers only (not transportation service customers) who are billed for pipeline services as part of the cost-of-gas billed." CenterPoint Energy seeks to vary the refund rule by using customer sales billed over the four months of January 2020-April 2020, the time period when the NNG higher rates were in effect, and "further seeks a variance to the 90-day refund requirement for amounts greater than \$5 per customer if Commission approval extends beyond January 2021."

CenterPoint Energy believes matching the refund to the specific timeframe [when the NNG higher rates were in effect] is most appropriate in this case and recommends using customer use for the four-month period as the basis for

allocating the refund rather than a strict use of the rule’s 12-month period. The rule stipulates a 90-day refund deadline for refunds exceeding \$5 per customer. These refunds are expected to exceed the per customer threshold. Further, the refund deadline would be in mid to late January since the larger refunds from Northern Natural Gas (“NNG”) were not received until October. As a result, the Company seeks expedited treatment, if possible, to meet the required 90-day refund timeline. CenterPoint Energy plans to combine the refunds into a single credit per active customer and asks for an additional variance(s) if the 90-day deadline applies to each refund individually and if the review extends beyond mid-January.

For comparison purposes, CenterPoint Energy provided the table copied below to show the average difference when the Company allocates the refund using twelve months of customer use (July 2019 - June 2020) versus the four months of actual January – April 2020. CenterPoint Energy stated:<sup>3</sup>

The residential class refunds are very close, but other classes differ more widely using annual sales volumes. The total refund dollars would remain the same, but the selected sales time-frame will allocate the refund to customers in different proportions.

Rate Class	4-month Average Refund	12-month Average Refund <sup>4</sup>
Residential	\$5.91	\$5.97
Com/Ind A	\$5.77	\$5.29
Com/Ind B	\$20.29	\$18.89
Com/Ind C	\$110.42	\$109.12
LG Firm	\$2,040.56	\$2,302.81
SVDF A	\$32.48	\$35.12
SVDF B	\$112.29	\$122.04
LVDF	\$152.09	\$237.44

## 2. Variance Request

Minn. R. 7829.3200, Subp. 1 provides that the commission shall grant a variance to its rules when it determines that the following requirements are met:

- A. Enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule;
- B. Granting the variance would not adversely affect the public interest; and

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<sup>3</sup> CenterPoint Petition, p. 6.

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

According to CenterPoint Energy, granting the requested variances to Minn. R. 7825.2700, Subp. 8 meets these criteria, as discussed below:

1. Enforcement of the Rule Would Impose an Excessive Burden Upon CenterPoint Energy and its Customers

CenterPoint Energy believes enforcement of the rule would lead to a mismatch (that could be avoided) of the dollars refunded to those who were billed and paid the pipeline charges if the dollars are allocated based on customer's full twelve months of use. Using the January to April 2020 customer use will allocate the refund to customers in relation to their - consumption over the heavy-use winter period over which it was billed. Granting the variances to allow use of four months of actual use will reflect use in those winter months and better assign the customers proportional share of the refund.

2. The Public Interest is Not Adversely Affected by Varying the Rules

The public interest would not be adversely affected by granting the requested variances. Granting the proposed variance will ensure that the refunds are returned to customers more consistently with how those charges were passed through.

3. 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.

## B. Department Comments

The Department noted that CenterPoint agreed

to comply with the requirement that refunds greater than \$5 per customer be refunded within 90 days conditionally if the Petition's review can be expedited. CenterPoint is proposing to provide the refund in mid to late January 2021 if the Commission can grant the requested Purchased Gas Adjustment (PGA) rule variances prior to that time period. If not, CenterPoint is requesting a variance to the 90-day limit included in the Refund Rule.

1. **12 Months of Customer Usage Requirement**

The Department stated that it

agrees with the Company regarding the need for a variance to the 12 months of customer usage requirement. The Department also notes that the three other interstate pipeline refund petitions referenced earlier all requested a similar

variance and that the Department agreed that such a variance was appropriate in each of those dockets.

## **2. Refunded within 90 days Requirement**

Regarding CenterPoint Energy's request for a variance to the requirement that cumulative refund amounts equal to or greater than \$5 per customer must be refunded within 90 days from the date the refund is received from a supplier or transporter, the Department stated:<sup>4</sup>

CenterPoint requested a variance to the requirement that it disburse the refund within the ninety-day time period given that the Company calculated the average refund to be greater than the \$5 threshold listed in the Refund Rule. Specifically, the Company requested "and additional variance(s) if the 90- day deadline applies to each refund individually and if the review extends beyond mid-January. The Company stated that it received the VGT refund in August 2020 and the NNG refund in October 2020. CenterPoint's position appears to be that since the larger NNG refund triggered the \$5.00 average refund per requirement, the Company should be allowed to use the date it received the NNG refund as the basis for the start date for the 90-day requirement. Using that start date, the Company would be required to provide the refund to customers by mid to late January 2021. While CenterPoint did request expedited treatment in the Petition, the Company also recognized the possibility that it might not have a Commission decision prior to that deadline. [Citations omitted.]

In its Petition, CenterPoint did not provide a separate discussion of the requested variance to the 90- day limit to disburse the refund. Conceptually, the Department agrees with the Company regarding the need for a variance to the 90-day refund requirement as a precautionary measure. The Department requests that CenterPoint include a request for this variance in its Reply Comments.

In addition, the Department does not believe that the Company needs a variance of the 90-day limit relating to its delay in disbursing the Viking refund. The VGT refund was not large enough to trigger the \$5.00 per customer requirement.

## **3. Customer Refund Criteria**

CenterPoint proposes to disburse the refund only to customers who have active accounts at the time the refund will be disbursed. The Department stated that CenterPoint "explained in an informal communication that it would not refund anything to individual accounts if they have left or closed the account for a supplier pipeline refund as that refund is part of the Company's gas costs."

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<sup>4</sup> Department Comments, pp. 4-5.

The Department noted that another natural gas local distribution company requesting a variance similar to the one CenterPoint is requesting cited Minnesota Stat. § 345.34 as the basis for the disbursement of its supplier pipeline refund.”<sup>5</sup>

Minnesota Statute § 345.34 covers the issue of “Deposits Held by Utilities”. Minnesota Stat. § 345.34 states:

Any deposit held or owing by any utility made by a subscriber to secure payment for, or any sum paid in advance for utility services to be furnished in this state, excluding any charges that may lawfully be withheld, that has remained unclaimed by the person appearing on the records of the utility entitled thereto for more than one year after the termination of the services for which the deposit or advance payment was made is presumed abandoned.

The Department requested that CenterPoint, in its Reply Comments, “explain why Minnesota Stat. § 345.34 is not applicable to its pipeline refund and provide support for its position that supplier gas cost refunds need only be refunded to active customers”.

#### **4. Additional Information Requested**

The Department also requested that CenterPoint provide additional information on the following before providing a final recommendation.

- Support for the pipeline refund amounts including interest.
- Support for CenterPoint’s conclusion that the inter-class allocation is appropriate given its proposed method of allocating the refund to active customers based on January through April 2020 usage.
- CenterPoint’s proposal to use four months of aggregate actual sales information to develop the refund per unit, rather than the 12 months required by rule.

Additionally, the Department recommended that the Commission require CenterPoint to provide a compliance filing that details the results of the refund’s disbursement.

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<sup>5</sup> Department Comments, p. 6, FN 8 “See Docket No. G004/M-20-813, In the Matter of a Request by Great Plains Natural Gas., a Division of Montana Dakota Utilities Co., for a Variance and Notice of Refund Plan for Northern Natural Gas and Viking Gas Transmission Pipeline Refunds, submitted November 4, 2020.”



## C. CenterPoint Energy Reply Comments

### 1. Ninety Day Refund Window

In response to the Department's request that CenterPoint provide a request for a variance from the 90-day refund requirement, CenterPoint provided the following additional discussion:

a. Proposed Variance Serves the Public Interest.

CenterPoint Energy requests a variance to Minnesota Rule 7825.2700, subpart 8, Refunds, requiring customers be refunded cumulative refund amounts equal or greater than \$5 per customer within 90 days from the date the refund is received from a supplier or transporter. The Company's understanding is the larger NNG refund triggers the \$5 average refund requirement and the October 31, 2020 receipt date should be the basis of the 90-day requirement. Since a final Order may not be received by January 29 (90 days from October 31), a variance in this instance is reasonable since interest will accrue on customer refund balances up until the date of the proposed one-time bill credit. While the Company acknowledges the Viking refund alone was not large enough to trigger the \$5 per customer requirement, observing and refunding amounts together with the NNG refund is consistent with the rule and serves the public interest: [Footnotes omitted.]

i. Enforcement of Rule would Impose an Excessive Burden on CenterPoint Energy and its Customers.

Enforcement of the rule imposes excessive burden because the dollar amount of the Viking refund is too small to effectively return to customers to whom was owed and not large enough to trigger the \$5 average refund requirement. Granting the proposed variance ensures the combined refunds, when administered together as a one-time bill credit, are returned to customers equitably in the most-timely manner possible in the event Commission action does not occur within the 90-day requirement, per the rule.

ii. The Public Interest is not Adversely Affected by Varying the Rules

Granting the proposed variance does not negatively impact public interest since customers will receive full, cumulative interest on refund balances as part of the one-time bill credit up until the time of processing.

iii. 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.

## 2. Customer Refund Criteria

In response to the Department's request that CenterPoint explain why Minnesota Stat. § 345.34 is not applicable to its pipeline refund and provide support for its position that supplier gas cost refunds need only be refunded to active customers, CenterPoint stated that it "interprets this rule to apply specifically to customer deposits, not refunds, and therefore believes Minnesota Stat. § 345.34 is not applicable in this instance."

CenterPoint clarified that:

[I]ts proposal seeks to refund the entirety of the refunds received from Viking and NNG only to active sales customers who have accounts at the time the refunds will be disbursed in January 2021 and were previously billed gas costs between January 2020 and April 2020. In other words, the total amount of the supplier refunds will be included in the one-time bill credit provided to active customers as an appropriate and fair match of cost recovery.

In support of its proposal, CenterPoint stated:

The Company's proposal to credit active customers through bill credits is the most administratively practical and timely method to return the full amount of the supplier refunds to customers and is consistent with how gas costs are typically recovered. In utility billing, customers are assigned a representative share of estimated gas costs, and charges and credits are accumulated over a year's period. Customers are not billed gas costs in the same method as the costs to suppliers are paid. Timing of payments to suppliers does not follow customer payments, especially with demand billings. Minnesota Rules 7825.2600 – 7825.2910 allow for gas costs to be reconciled at year's end by the purchased gas adjustment, and the supplier refund rule controls how to return refunds from pipeline suppliers. In addition, the Company's proposed manner is consistent with how supplier refunds have been handled in the past<sup>6</sup> when refunding through the purchased gas adjustment mechanism (i.e., gas costs are reduced from refund, but only active customers receive the benefit of the lower gas costs).

## 3. Additional Information

CenterPoint also responded to the Department's requests for additional information as follows:

- Support for the pipeline refund amounts including interest. CenterPoint provided Attachment 1 to its Reply Comments providing support for the supplier refunds and interest on the refund balances.

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<sup>6</sup> CenterPoint Energy's Reply Comments, p. 2, FN 1 "See Docket No. G-999/AA-12-756; CenterPoint requested permission to surcharge for the return of funds previously refunded to customers as a supplier refund."

- Support for CenterPoint’s calculation of the refund amount per unit and the allocation to customer classes. CenterPoint stated:

The Refund Rule requires that “Refunds must be allocated to customer classes in proportion to previously charged costs of purchased gas.” The Company proposed in its Petition to vary the refund rule by using customer sales billed over the four months of January 2020 through April 2020 instead of the latest 12 months of use prescribed by the rule. As proposed, the Company believes this method is a more precise allocation of the refunds to active customers over the period this group of customers was initially billed for pipeline services as part of cost-of-gas billed. While the Department recognized the rationale for this position in Comments, it recommended CenterPoint provide additional support for this proposal in Reply Comments. [Footnotes omitted.]

The Company provides Attachment 1 with the supporting calculations reflected in the initial Petition in response to the Department’s request. The allocation of the refund to customer classes and the calculation of the refund amount per unit within the customer classes is included in the “Class Allocation – 4 Months” tab. This information was not provided initially since precise refund allocations and per unit calculations will not be finalized until the time bill credits are processed, which first requires Commission approval. This timing impacts final interest refund requirements and also the final identification of active customers that will receive the totality of the refunds.

CenterPoint also confirmed it will provide a full accounting of refund amounts, interest accrued and disbursement in a subsequent compliance filing after the refunds are processed, as recommended by the Department.

#### **D. Department Supplemental Comments**

The Department reviewed the information provided in CenterPoint’s Reply Comments and responded as follows:

##### **1. Support for the pipeline refund amounts including interest.**

The Department reviewed the calculations provided in CenterPoint’s Reply Comments Attachment 1 and stated “[t]hey appear reasonable and the Department recommends that the Commission accept CenterPoint’s proposed refund amount.”

##### **2. Support for CenterPoint’s calculation of the refund amount per unit and the allocation to customer classes.**

The Department also reviewed the calculation of the refund amount per unit and the allocation of the refund to CenterPoint’s customer classes included in CenterPoint’s Reply Comments Attachment 1. The Department stated, “Those two calculations also appear to be reasonable and the Department recommends the Commission accept the Company’s proposed method.”

### 3. Customer Refund Criteria

The Department stated:

Conceptually, the Department does not agree with CenterPoint's proposed customer refund criteria. The primary criterion from the Department's perspective is that CenterPoint should be required to provide a refund to all the customers who purchased natural gas during the time when CenterPoint was recovering the higher interim Viking and Northern Natural Gas's higher rates in early 2020 via its Purchased Gas Adjustment, not just customers who are still active as of January 2021. Given the desire to return refunds to customers as quickly as possible during the COVID-19 pandemic, the Department agrees that use of CenterPoint's proposed customer refund criteria is reasonable. However, the Department considers the process described in Minn. Stat. § 345.34 to be more a more equitable approach to customer refunds and will provide further discussion for consideration on this issue in future proceedings where refunds are required.

#### 4. Ninety-day refund requirement.

The Department agreed with CenterPoint regarding the need for a variance to the 90-day refund requirement.

### 5. Department Recommendations

The Department recommended that the Commission:

- Approve the Company's proposed refund amount and interest calculations.
- Approve CenterPoint's calculation of the refund amount per unit and allocation to customer classes.
- Approve the Company's proposal to provide refunds to all customers who have active accounts as of the date of the refund.
- Grant a variance and allow the Company to calculate the refund per unit amount using 4 months of actual usage rather than the 12 months required by Minn. R. 7825.2700, subp. 8.
- Grant the Company's requested variance to Minn. R. 7825.2700, subp. 8 that would allow CenterPoint more than 90 days to provide the refund discussed in CenterPoint's Reply Comments.
- Require CenterPoint to report on the status of the refund after it is completed and to provide a reconciliation of its disbursement.

#### E. CenterPoint Supplemental Reply Comments

CenterPoint stated that it "supports the recommendations outlined in the Department's analysis and confirms it will provide a reconciliation of the refunds in a subsequent compliance filing after the refunds are processed."

## V. Staff Analysis

With respect to CenterPoint's proposal to refund only active customers at the time of the refund, staff notes that the Commission recently approved Minnesota Energy Resources Corporation's (MERC) proposals to make refunds via the purchased gas adjustment mechanism.<sup>7</sup> Under MERC's proposals, only customers active during the month of the refund would see any benefit from the refunds.

The Department has said it will look further into the applicability of Minn. Stat. § 345.34 to customer refunds in future proceedings where refunds are required. Staff believes § 345.34 applies to various types of refunds besides unclaimed (or abandoned) customer deposits, particularly refunds of interim rates, and perhaps supplier refunds.

For example, several years ago Xcel Energy explained informally in an e-mail to staff its process for refunding interim rates to customers who had left its system. It is staff's understanding that this is still Xcel Energy's policy. Xcel explained that it handles unclaimed interim rate refunds in two ways:

If the account has a credit amount of \$2.00 or more, a check is mailed to the last known address. If the check is not cashed within the one-year dormancy period, the check is escheated to the state. If the customer credit totals \$50 or more, an additional step is taken to locate the owner by sending a due diligence letter to the customer's last known address in July of the year the check is due to be escheated. If no response is received to the letter, the money is escheated to the state of MN with our annual filing in October.

If the account has a credit amount of less than \$2.00, the credit remains on the account for one year. After one year, the credit is moved to the Company's unclaimed property system for two years. If the customer reconnects service on that account during this three-year period, the credit is made available to them. After the three-year dormancy period, the credit is escheated to the state with our annual filing in October.

Staff recognizes this issue is resolved between CenterPoint and the Department, in this docket, at this time, however, the Commission may want to ask CenterPoint to explain its policy and procedures for refunding to customers who have left its system in a compliance filing. The Commission may want to ask CenterPoint to explain its policy and its practice in detail for handling all kinds of refunds, and whether its policy applies to only specific kinds of refunds and why. If the Commission requires this compliance filing, the Commission may want to ask for

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<sup>7</sup> See *In the Matter of the Petition of Minnesota Energy Resources Corporation for a Variance and Notice of Refund Plan for Northern Natural Gas Pipeline Refund*, Docket No. G-011/M-20-700, ORDER (Jan. 8, 2021). See also *In the Matter of the Petition of Minnesota Energy Resources Corporation for a Variance and Notice of Refund Plan for Viking Gas Transmission Pipeline Refund*, Docket No. G-011/M-20-702, ORDER (Jan. 8, 2021)

this information to be filed in this docket and, at the same time, with CenterPoint's compliance filing for its interim rate refund plan, in its rate case, in Docket No. G-008/GR-19-524.

## VI. Decision Alternatives

- 1) Approve the Company's proposed refund amount and interest calculations. [Department, CenterPoint agrees]
- 2) Approve CenterPoint's calculation of the refund amount per unit and allocation to customer classes. [Department, CenterPoint agrees]
- 3) Approve the Company's proposal to provide refunds to all customers who have active accounts as of the date of the refund. [Department, CenterPoint agrees]
- 4) Grant a variance and allow the Company to calculate the refund per unit amount using 4 months of actual usage rather than the 12 months required by Minn. R. 7825.2700, subp. 8. [Department, CenterPoint]
- 5) Grant the Company's requested variance to Minn. R. 7825.2700, subp. 8 that would allow CenterPoint more than 90 days to provide the refund discussed in CenterPoint's Reply Comments. [Department, CenterPoint]
- 6) Require CenterPoint to report on the status of the refund after it is completed and to provide a reconciliation of its disbursement. [Department, CenterPoint]
- 7) Require CenterPoint to submit a compliance filing in this docket, and at the same time in Docket No. G-008/GR-19-524, explaining its policy and practice for refunding customers who have left its system. [Staff provided alternative.]