



800 LaSalle Avenue
P.O. Box 59038
Minneapolis, MN 55459-0038

February 19, 2014

Dr. Burl Haar
Executive Secretary
Minnesota Public Utilities Commission
121 East Seventh Place, Suite 350
St. Paul, Minnesota 55101-2147

**Re: REPLY COMMENTS – In the Matter of CenterPoint Energy’s Request for Cold Weather Rule Script Revisions;
Docket Nos. G008/CI-04-2001 and G008/M-14-134.**

Dear Dr. Haar:

CenterPoint Energy has received and reviewed the comments from the Minnesota Department of Commerce, Division of Energy Resources (Department), concerning CenterPoint Energy’s request for approval of Cold Weather Rule script revisions, Docket Nos. G008/CI-04-2001 and G008/M-14-134.

The Department recommends approval with modifications.

CenterPoint Energy agrees with the Department’s modifications and has attached a revised mark-up version and a clean version reflecting the Department’s recommendations. CenterPoint Energy appreciates the timely review by the Department.

If you have any questions, please contact me at (612) 321-4719.

Sincerely,

/s/

Adam Pyles
Director, Regulatory Activities

Enclosures
cc: Service List

AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

Mary Jo Schuh, being first duly sworn on oath, deposes and says she served the attached Reply Comments via e-filing to the Minnesota PUC and DOC, as well as all other parties on the attached Service List.

 /s/ _____
Mary Jo Schuh

Subscribed and sworn to before me
this 19th day of February, 2014.

 /s/ _____
Linda Baumann, Notary Public
My Commission expires 1/31/15

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	No	OFF_SL_04-2001_1
Jeanne	Cochran	Jeanne.Cochran@state.mn.us	Office of Administrative Hearings	P.O. Box 64620 St. Paul, MN 55164-0620	Electronic Service	No	OFF_SL_04-2001_1
Jeffrey A.	Daugherty	jeffrey.daugherty@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave Minneapolis, MN 55402	Electronic Service	No	OFF_SL_04-2001_1
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, 1400 BRM Tower St. Paul, MN 55101	Electronic Service	No	OFF_SL_04-2001_1
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	Yes	OFF_SL_04-2001_1
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_04-2001_1
John	Harvanko	John.Harvanko@state.mn.us	MN Department Of Commerce	Suite 500 85 7th Place East St. Paul, MN 551012198	Electronic Service	Yes	OFF_SL_04-2001_1
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No	OFF_SL_04-2001_1
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_04-2001_1
Adam	Pyles	adam.pyles@centerpointenergy.com	CenterPoint Energy	800 LaSalle Avenue PO Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_04-2001_1

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_04-2001_1
Gary	Van Winkle	gvanwinkle@mylegalaid.org	Mid-Minnesota Legal Aid	430 1st Ave N Ste 300 Minneapolis, MN 55401-1780	Paper Service	No	OFF_SL_04-2001_1
Gillette	Williams	N/A	Community Action Partnership	of Suburban Hennepin 8800 Highway 7, Ste. 401 St. Louis Park, MN 55426	Paper Service	No	OFF_SL_04-2001_1

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_14-134_M-14-134
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_14-134_M-14-134
James J.	Bertrand	james.bertrand@leonard.com	Leonard Street & Deinard	150 South Fifth Street, Suite 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-134_M-14-134
Brenda A.	Bjorklund	brenda.bjorklund@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave FL 14 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-134_M-14-134
Jerry	Dasinger	jerry.dasinger@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	No	OFF_SL_14-134_M-14-134
Jeffrey A.	Daugherty	jeffrey.daugherty@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-134_M-14-134
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, 1400 BRM Tower St. Paul, MN 55101	Electronic Service	No	OFF_SL_14-134_M-14-134
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_14-134_M-14-134
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Paper Service	No	OFF_SL_14-134_M-14-134
Elizabeth	Goodpaster	bgoodpaster@mncenter.org	MN Center for Environmental Advocacy	Suite 206 26 East Exchange Street St. Paul, MN 551011667	Electronic Service	No	OFF_SL_14-134_M-14-134

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_14-134_M-14-134
Robert	Harding	robert.harding@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_14-134_M-14-134
Richard	Haubensak	RICHARD.HAUBENSAK@CONSTELLATION.COM	Constellation New Energy Gas	Suite 200 12120 Port Grace Boulevard La Vista, NE 68128	Electronic Service	No	OFF_SL_14-134_M-14-134
Nancy	Kelly	bademailnancyk@eureka-recycling.org	Eureka Recycling	2828 Kennedy Street NE Minneapolis, MN 55413	Paper Service	No	OFF_SL_14-134_M-14-134
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_14-134_M-14-134
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_14-134_M-14-134
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_14-134_M-14-134
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-134_M-14-134
Adam	Pyles	adam.pyles@centerpointenergy.com	CenterPoint Energy	800 LaSalle Avenue PO Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_14-134_M-14-134
Kent	Ragsdale	kentragsdale@alliantenergy.com	Alliant Energy-Interstate Power and Light Company	P.O. Box 351 200 First Street, SE Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_14-134_M-14-134

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	Ste 122 9100 W Bloomington Fwy Bloomington, MN 55431	Electronic Service	No	OFF_SL_14-134_M-14-134
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	800 LaSalle Avenue PO Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_14-134_M-14-134
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-134_M-14-134
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_14-134_M-14-134

CWR Reconnection Script

The following will be played on the IVR for all Billing, Credit, and Move calls:

The following are important rights under the Cold Weather Rule. The state of Minnesota has a Cold Weather Rule that protects its citizens from the loss of heat in the winter if they are unable to pay their utility bills. Regardless of income, you have the right to a payment plan that takes into consideration your financial and extenuating circumstances. In addition, if your monthly household income ~~is less than half the state average~~ meets the Energy Assistance Program guidelines, your natural gas service will be reconnected if you agree to pay as much as you can but you are not required to pay more than 10% of your monthly household income.

“If you are calling to reconnect service, a Customer Service Representative will be asking you additional questions and reading a script required by the Minnesota Public Utilities Commission regarding Cold Weather Rule rights and responsibilities.”

STEP ONE

If the customer states s/he has already heard the script AND the CSR confirms this fact based on notes in the contact log, the customer may opt out of the script. If the customer opts out, any continued conversation must be consistent with the intention of the script. Customer must initiate the opt-out request.

“Have you heard your rights under the Cold Weather Rule?”

If no or if the call came through on a line that did not play the IVR message, the CSR will state:

The following are important rights under the Cold Weather Rule. The state of Minnesota has a Cold Weather Rule that protects its citizens from the loss of heat in the winter if they are unable to pay their utility bills. Regardless of income, you have the right to a payment plan that takes into consideration your financial and extenuating circumstances. In addition if your monthly household income ~~is less than half the state average~~ meets the Energy Assistance Program guidelines, your natural gas service will be reconnected if you agree to pay as much as you can but you are not required to pay more than 10% of your monthly household income.

The CSR will ask all customers: ***“Do you have any questions about your rights under the Cold Weather Rule?”*** The CSR will provide answers as appropriate.

STEP TWO

The CSR will create a contact log to document relevant information, and:

If the call is a request for reconnection of heat affected residential service, the CSR will read the following script:

The purpose of this conversation is to see how we can get you reconnected and protect your account from disconnection. We will restore your service if we can agree on a payment plan that takes into consideration financial and extenuating circumstances. If we cannot agree, an appeals process is available to you through the Minnesota Public Utilities Commission.

“Could you answer a couple of questions to establish a payment plan under the Cold Weather Rule?”

“The information you provide is considered private and confidential.”

(Customer Service Rep must refer to table)

If yes: - ***“How many people live in your household?”***
- ***“What is your monthly household income before taxes or any other deductions?”***

If no, or if over CWR income guidelines, go to Step 4

STEP THREE

If the customer’s stated income is within the ~~Cold Weather Rule~~**Energy Assistance Program** guidelines, the Customer Service Rep will state the following:

-“Based on your stated household income, you may not be required to pay more than 10% of your monthly income in order to have service reconnected. We may need to verify your income according to Cold Weather Rule guidelines.”

-“What can you afford to pay per month?”

If CPE agrees to this amount, and if the customer has not received an Energy Assistance Program grant and has not already indicated their source of income, then the Customer Service Rep will ask

“What is your source of income?”

Based on the information provided by the customer, the CSR will explain the requirements for verifying income (consistent with Minn. Stat. 216B.096 Subd. 6). Upon receipt of verification, reconnection will be scheduled. If the customer has already received an Energy Assistance Program grant, then there is no need to verify income and the reconnection will be scheduled.

If CPE does not agree, and if the customer has not received an Energy Assistance Program grant, then the Customer Service Rep may counter offer but may NOT request an amount of more than 10% of the customer’s monthly income.

If CPE and the customer reach agreement, and if the customer has not already indicated their source of income, then the Customer Service Rep will ask

“What is your source of income?”

Based on the information provided by the customer, the Customer Service Rep will explain the requirements for verifying income. Upon receipt of verification, reconnection will be scheduled. If the customer has already received an Energy Assistance Program grant, then there is no need to verify income and the reconnection will be scheduled.

If customer fails to provide verification, CPE will reinitiate customer contact to either receive verification or attempt to obtain a payment plan.

The Customer Service Rep will also inform the customer that, while an application for assistance is not required for reconnection, funds may be available through the Energy Assistance Program and other programs to help the customer pay his or her bill and give the customer the agency contact information.

If agreement is reached, go to Closing Statement.

If agreement is not reached, then the Customer Service Rep will state:

“Based on what you told me, I need to refer you to our credit department for further consideration.”

The Customer Service Rep will refer the customer to the company’s internal escalation process for further consideration. That process will continue with Steps Five, Six and the Closing Statement

The Customer Service Rep will then go to the Closing Statement.

STEP FOUR (“payment plan” customers):

If customer does not provide income information or if the customer’s monthly income ~~is more than or equal to 50% of the state median~~ does not meet the Energy Assistance Program guidelines, the Customer Service Rep will state:

- *“Based on your situation, what can you afford to pay toward your past-due balance to get your service restored?”*

-If CPE will not agree to this amount- *“That’s less than we would normally accept. Has anything changed in your household that is preventing you from paying your gas bill?”*

If the customer did not provide a financial or extenuating circumstance the CSR will ask:

“Are you facing any other circumstances that we should consider?”

If the customer’s monthly income ~~is more than or equal to 50% of the state median~~ does not meet the Energy Assistance Program guidelines and the customer is not facing any other circumstances that should be considered, or if the customer does not provide information about income or circumstances, then the Customer Service Representative may ask that a portion of past-due charges be paid in addition to establishing a monthly payment amount when offering a payment arrangement by asking:

- *“Based on what you’ve told me, can you agree to pay \$___ now to get service reconnected? This includes the reconnection fee.”*

If the customer agrees to pay the portion of past-due charges, then the Customer Service Rep will also propose a monthly payment amount that includes the remaining past-due balance and the future monthly charges.

If the customer and the company are not able to agree on a payment plan, or if the customer is facing other circumstances that should be considered, then the Customer Service Rep will refer the customer to the company's internal escalation process for further consideration. That process will continue with Steps Five, Six and the Closing Statement.

“Based on what you told me, I need to refer you to our credit department for further consideration.”

CSR will explain the requirements for verifying extenuating circumstances, if applicable.

STEP FIVE

If the customer and company are able to agree on a payment plan, then the Customer Service Rep will go through the process for reconnecting.

Go to Closing Statement.

STEP SIX

If the customer and company are not able to agree on a payment plan, the Customer Service Rep will state:

In order to restore your service, I will send you an appeals form. You will have 10 working days from today to fill it out and send it to the Minnesota Public Utilities Commission. Once the Commission receives your form, we will contact you to schedule reconnection.

CSR will offer to mail, e-mail or fax the appeals form to the customer.

CLOSING STATEMENT:

Rep: ***“Thank you for your call. If you have questions about your rights under the Cold Weather Rule, please contact the Minnesota Public Utilities Commission or the Minnesota Attorney General’s Office. Would you like their numbers?”***

If yes, the Customer Service Rep will give them the appropriate numbers and explain that the local number should be used unless the customer is calling from outside the metro area:

Minnesota Public Utilities Commission *651-296-0406 or 1-800-657-3782*

Minnesota Attorney General's Office: *651-296-3353 or 1-800-657-3787.*

At certain times of the Cold Weather Rule period and in certain geographical areas, CPE will offer to transfer the customer directly to their local Energy Assistance agency. The timing and geographic constraints are to accommodate the needs of the Energy Assistance agencies.

CWR Reconnection Script

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“If you are calling to reconnect service, a Customer Service Representative will be asking you additional questions and reading a script required by the Minnesota Public Utilities Commission regarding Cold Weather Rule rights and responsibilities.”

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“The information you provide is considered private and confidential.”

(Customer Service Rep must refer to table)

If yes: - ***“How many people live in your household?”***
- ***“What is your monthly household income before taxes or any other deductions?”***

If no, or if over CWR income guidelines, go to Step 4

STEP THREE

If the customer’s stated income is within the Energy Assistance Program guidelines, the Customer Service Rep will state the following:

-“Based on your stated household income, you may not be required to pay more than 10% of your monthly income in order to have service reconnected. We may need to verify your income according to Cold Weather Rule guidelines.”

-“What can you afford to pay per month?”

If CPE agrees to this amount, and if the customer has not received an Energy Assistance Program grant and has not already indicated their source of income, then the Customer Service Rep will ask

“What is your source of income?”

Based on the information provided by the customer, the CSR will explain the requirements for verifying income (consistent with Minn. Stat. 216B.096 Subd. 6). Upon receipt of verification, reconnection will be scheduled. If the customer has already received an Energy Assistance Program grant, then there is no need to verify income and the reconnection will be scheduled.

If CPE does not agree, and if the customer has not received an Energy Assistance Program grant, then the Customer Service Rep may counter offer but may NOT request an amount of more than 10% of the customer’s monthly income.

If CPE and the customer reach agreement, and if the customer has not already indicated their source of income, then the Customer Service Rep will ask

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Based on the information provided by the customer, the Customer Service Rep will explain the requirements for verifying income. Upon receipt of verification, reconnection will be scheduled. If the customer has already received an Energy Assistance Program grant, then there is no need to verify income and the reconnection will be scheduled.

If customer fails to provide verification, CPE will reinitiate customer contact to either receive verification or attempt to obtain a payment plan.

The Customer Service Rep will also inform the customer that, while an application for assistance is not required for reconnection, funds may be available through the Energy Assistance Program and other programs to help the customer pay his or her bill and give the customer the agency contact information.

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STEP FOUR (“payment plan” customers):

If customer does not provide income information or if the customer’s monthly income does not meet the Energy Assistance Program guidelines, the Customer Service Rep will state:

- “Based on your situation, what can you afford to pay toward your past-due balance to get your service restored?”

-If CPE will not agree to this amount- ” That’s less than we would normally accept. Has anything changed in your household that is preventing you from paying your gas bill?”

If the customer did not provide a financial or extenuating circumstance the CSR will ask:

“Are you facing any other circumstances that we should consider?”

If the customer’s monthly income does not meet the Energy Assistance Program guidelines and the customer is not facing any other circumstances that should be considered, or if the customer does not provide information about income or circumstances, then the Customer Service Representative may ask that a portion of past-due charges be paid in addition to establishing a monthly payment amount when offering a payment arrangement by asking:

- “Based on what you’ve told me, can you agree to pay \$___ now to get service reconnected? This includes the reconnection fee.”

If the customer agrees to pay the portion of past-due charges, then the Customer Service Rep will also propose a monthly payment amount that includes the remaining past-due balance and the future monthly charges.

If the customer and the company are not able to agree on a payment plan, or if the customer is facing other circumstances that should be considered, then the Customer Service Rep will refer the customer to the company's internal escalation process for further consideration. That process will continue with Steps Five, Six and the Closing Statement.

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CSR will explain the requirements for verifying extenuating circumstances, if applicable.

STEP FIVE

If the customer and company are able to agree on a payment plan, then the Customer Service Rep will go through the process for reconnecting.

Go to Closing Statement.

STEP SIX

If the customer and company are not able to agree on a payment plan, the Customer Service Rep will state:

In order to restore your service, I will send you an appeals form. You will have 10 working days from today to fill it out and send it to the Minnesota Public Utilities Commission. Once the Commission receives your form, we will contact you to schedule reconnection.

CSR will offer to mail, e-mail or fax the appeals form to the customer.

CLOSING STATEMENT:

Rep: ***“Thank you for your call. If you have questions about your rights under the Cold Weather Rule, please contact the Minnesota Public Utilities Commission or the Minnesota Attorney General's Office. Would you like their numbers?”***

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