



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

February 10, 2014

VIA Electronic Filing

Dr. Burl W. Haar, Executive Secretary
Minnesota Public Utilities Commission
Consumer Affairs Office
121 East 7th Place, Suite 350
Saint Paul, Minnesota 55101

Re: Cold Weather Rule Script Revisions

Dear Dr. Haar:

Pursuant to the Commission's September 26, 2006 Order in Docket No. G-008/CI-04-2001, CenterPoint Energy is filing proposed revisions to the "script" used by CenterPoint Energy Customer Service Representatives when discussing customer reconnections under the Cold Weather Rule. As described in the Order, minor changes to the script that have been agreed upon among the parties may be handled through the consent agenda. A similar request was approved in September 2012 in Docket No. G-008/M-12-905. The purpose of this filing is to reconcile CenterPoint Energy's "script" with recent changes to the Minnesota Energy Assistance Program.

On February 4, 2014, the Minnesota Department of Commerce announced changes to the income eligibility guidelines for the Energy Assistance Program (EAP) for the program year from October 1, 2013 through September 30, 2014. These changes will allow households with income up to 60% of the State Median Income (SMI) to be eligible for EAP compared to the previous guideline of 50% of SMI.

Under the Minnesota Cold Weather Rule (Minn. Stat. §216B.096, Subd. 5(a)), utility customers with household income at or below 50% of SMI may not be disconnected, and must be reconnected, "if the customer enters into and makes reasonably timely payments under a mutually acceptable payment agreement with the utility that is based on the financial resources and circumstances of the household; provided that, a utility may not require a customer to pay more than ten percent of the household income toward current and past utility bills for utility heating service." (emphasis added)

Given the recent change in EAP guidelines, customers with household income between 50% and 60% of SMI could receive Energy Assistance, but not receive the protections available under Subd. 5 (a) of the Cold Weather Rule. CenterPoint Energy believes this could create customer confusion and dissatisfaction and would require the creation of inefficient changes to established business and administrative processes. To avoid this and given the fact only nine weeks remain of the current Cold Weather Rule period, CenterPoint Energy would like to make available the provisions of Subd. 5(a) of the Cold Weather Rule to customers whose household income is at or below 60% of SMI. This would reestablish the longstanding parity of the EAP income eligibility and Cold Weather Rule payment arrangement eligibility under Subd. 5(a).

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The currently approved “script” used by CenterPoint Energy refers to household income that is half or 50% of SMI. CenterPoint Energy proposes to replace these phrases with a reference to “Energy Assistance guidelines”. For the remainder of the current Cold Weather Rule period, this change would allow CenterPoint Energy to make available the payment terms of Cold Weather Rule Subd. 5(a) to customers in households with income up to 60% of SMI. If the income eligibility guidelines for future Energy Assistance Program years change back to 50% of SMI, the proposed language would avoid the need to file another request for approval of changes to the “script”.

Attached is a mark-up version and a clean version of the proposed changes for review.

We have reviewed the proposed changes with the Energy Cents Coalition and it is our understanding that the Energy Cents Coalition support or have no objections to them.

CenterPoint Energy requests approval of these changes as soon as practicable to minimize the number of customers affected by the recently created discrepancy between the income eligibility for Energy Assistance and the availability of Cold Weather Rule Subd. 5(a) payment arrangements.

Please contact me if you have any questions.

Sincerely,

/s/

Adam Pyles
Director, Regulatory Activities
612-321-4719

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 Proposed Revisions to the CWR Script 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 10th 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
David	Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street Minneapolis, MN 554024629	Electronic Service	No	GEN_SL_CenterPoint Energy_General Service List
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	GEN_SL_CenterPoint Energy_General Service List
James J.	Bertrand	james.bertrand@leonard.com	Leonard Street & Deinard	150 South Fifth Street, Suite 2300 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_CenterPoint Energy_General Service List
Brenda A.	Bjorklund	brenda.bjorklund@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave FL 14 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_CenterPoint Energy_General Service List
Jerry	Dasinger	jerry.dasinger@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	No	GEN_SL_CenterPoint Energy_General Service List
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Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	GEN_SL_CenterPoint Energy_General Service List
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Elizabeth	Goodpaster	bgoodpaster@mncenter.org	MN Center for Environmental Advocacy	Suite 206 26 East Exchange Street St. Paul, MN 551011667	Electronic Service	No	GEN_SL_CenterPoint Energy_General Service List

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	No	GEN_SL_CenterPoint Energy_General Service List
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Nancy	Kelly	bademailnancyk@eureka recycling.org	Eureka Recycling	2828 Kennedy Street NE Minneapolis, MN 55413	Paper Service	No	GEN_SL_CenterPoint Energy_General Service List
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Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_CenterPoint Energy_General Service List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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	GEN_SL_CenterPoint Energy_General Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	GEN_SL_CenterPoint Energy_General Service List

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 Energy Assistance 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 Energy Assistance 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](#) 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 Energy Assistance 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~~ the Energy Assistance 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~~ the Energy Assistance 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.

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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.

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