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July 1, 2020

Mr. Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 East Seventh Place, Suite 350  
St. Paul, MN 55101-2147

**RE: In the Matter of the Request of Minnesota Regulated Gas and Electric Utilities for Authorization to Track Expenses Resulting from the Effects of COVID-19 and Record and Defer Such Expenses into a Regulatory Asset**

**Supplemental Comments**

**Docket No. E,G-999/M-20-427**

Dear Mr. Seuffert:

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas (“CenterPoint Energy” or “Company”), respectfully submits these Comments to the Minnesota Public Utilities Commission (“Commission”) to supplement its June 10, 2020 Initial Comments, specifically to address the types of costs and foregone revenues the Company expects to track as a result of COVID-19 for the purpose potentially of seeking recovery at a later date.

The expense items identified by the Company can result in both positive and negative financial impacts to the Company, and the net result will be booked to a Regulatory Asset account. The baseline to track these items will be the current level of expense and revenues, net of decoupling, as filed in the Company’s current rate case, Docket G008/GR-19-524. If the Commission sets final rates in Docket G008/GR-19-524 based on different revenue and expense levels, the Company would be agreeable to updating the baseline to be in sync with approved rates for the 2020 Test Year. The Company will track impacts beginning with the issuance of the Governor’s March 13, 2020 order declaring a peacetime emergency. The Company will track expenses on a monthly basis for an undetermined amount of time. Attachment A identifies each specific item being tracked, whether each item adds to the regulatory asset or is an offset, a brief description of the item, and the basis for the deferral calculation.

To summarize the COVID-19 Impacts the Company will be tracking:

- Bad Debt, Materials, Network, Overtime, Travel and Entertainment, Fleet, and Disconnection expenses will be compared on a dollar for dollar basis with the amounts included in the 2020 Test Year. The Test Year amounts will be prorated by the number

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of actual months costs are tracked for deferral purposes. For example, if costs are deferred for 10 months they will be compared against 5/6 of the Test Year amount.

- Actual Customer counts will also be compared against the monthly amounts included in the 2020 Test Year.
- Actual Sales will be compared against the 2020 Test Year but will be adjusted for any recovery or refund made as a function of decoupling.
- Late Payment and Reconnection Revenue will be compared on a dollar for dollar basis with the amount included in the 2020 Test Year. The Test Year amounts will be prorated by the number of actual months costs are tracked for deferral purposes.

The items identified in Attachment A are not meant to be a comprehensive list of items that will be impacted by COVID-19 and the Governor's emergency order. As this crisis continues the Company may find that it is incurring substantial costs, loss of revenues, or offsetting savings in other areas. In particular, the Company may not have foreseen all costs that may result from the resumption of collection activities. In its quarterly filings to the Commission, the Company may amend this list to add additional financial impacts.

Please feel free to contact me at 612-321-4625 or [amber.lee@centerpointenergy.com](mailto:amber.lee@centerpointenergy.com) with any questions.

Sincerely,

/s/ Amber Lee

Amber Lee  
Director, Regulatory Affairs

C: Service List

REGULATORY ASSET TRACKER - COVID-19

| Category | Initiative | Item                           | Category*   | Short Description   | Basis   | Internal Order | 2020 Actual | 2020 Estimate | Reg Asset/(Liability) |
|----------|------------|--------------------------------|-------------|---|---|----------------|-------------|---------------|-----------------------|
| O&M      | Non-Labor  | Bad Debt Expense               | Add         | Due to unemployment and lack of disconnections Bad Debt is expected to increase   | Actual bad debt will be compared with 2020 Test Year in Docket 19-524   |                |             |               | \$ -                  |
| O&M      | Non-Labor  | Materials                      | Add         | 1) Materials and Supplies purchased in support of pandemic response (hand sanitizer, Personal Protection Equipment, sleeping bags, cots, etc.) 2)MRES to prepare for sequester in the event 40% infection of critical operations workforce  | CNP is tracking these expenses separately and proposes any purchases for these materials are deferred to the Regulatory Asset                         |                |             |               | \$ -                  |
| O&M      | Non-Labor  | Network                        | Add         | Additional costs to support work from home directive as prescribed by state and federal orders which include expanded conference line capacity, increased network bandwidth, expanded video conferencing licenses, cell phone hot spots, laptops, head-sets, cyber security, and other tools needed to perform work from home | Additional Costs incurred to support the work from home. These amounts will all be incremental. The Company is tracking incremental costs separately. |                |             |               | \$ -                  |
| O&M      | Labor      | Overtime                       | Add         | 1) Unaffected/healthy employees working additional shifts to cover for those that are sick/quarantined or unable to work during emergency. 2)Additional hours to complete work due to social distancing   | Actual labor will be compared with 2020 Test Year in Docket 19-524  |                |             |               | \$ -                  |
| O&M      | Non-Labor  | Fleet                          | Add/Offset  | Additional costs from social distancing and workforce changes such as fuel and maintenance for taking vehicles to employees homes for rapid response. Reduction in costs could result from lower use of pool vehicles.  | Actual costs will be compared with 2020 Test Year in Docket 19-524  |                |             |               | \$ -                  |
| O&M      | Non-Labor  | Contractor Disconnection Costs | Add/Offset  | Disconnections are temporarily suspended which should result in an initial reduced cost to the company. However, increased costs associated with disconnections could arise if overtime is needed once disconnections resume.   | Actual costs will be compared with 2020 Test Year in Docket 19-524  |                |             |               | \$ -                  |
| Revenue  | Gas        | Sales                          | Margin loss | Customer energy usage anticipated to decrease as a result of lower demand as well as government restrictions on operations. Net of decoupling   | Actual revenues will be compared with 2020 Test Year in Docket 19-524 Net of decoupling   |                |             |               | \$ -                  |
| Revenue  | Gas        | Customer Loss                  | Margin loss | Reduction in customer counts from business closures   | Actual revenues will be compared with 2020 Test Year in Docket 19-524   |                |             |               | \$ -                  |
| Revenue  | Gas        | Late Payment revenues          | Margin loss | Customer fees waived as a result of supporting the economy and customer impacts.  | Actual revenues will be compared with 2020 Test Year in Docket 19-524   |                |             |               | \$ -                  |
| O&M      | Non-Labor  | Travel and Entertainment       | Offset      | Due to COVID-19 Travel and Entertainment has temporarily been suspended.  | Actual costs will be compared with 2020 Test Year in Docket 19-524  |                |             |               | \$ -                  |

\*The Category tracks whether or not the item identified will increase the Regulatory Asset amount deferred, or offset the amount in the deferral. Margin Loss will increase the Regulatory Asset.

**CERTIFICATE OF SERVICE**

Erica Larson served the above Supplemental Comments and Attachment of CenterPoint Energy to all persons at the addresses indicated on the attached list by having the document delivered by electronic filing.

*/s/* \_\_\_\_\_

Erica Larson  
Regulatory Analyst  
CenterPoint Energy

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| First Name | Last Name  | Email                               | Company Name                                     | Address   | Delivery Method    | View Trade Secret | Service List Name      |
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| Lynnette   | Sweet      | Regulatory.records@xcelenergy.com   | Xcel Energy                                      | 414 Nicollet Mall FL 7<br><br>Minneapolis,<br>MN<br>554011993                     | Electronic Service | No                | OFF_SL_20-427_Official |
| Stuart     | Tommerdahl | stommerdahl@otpc.com                | Otter Tail Power Company                         | 215 S Cascade St<br>PO Box 496<br>Fergus Falls,<br>MN<br>56537                    | Electronic Service | No                | OFF_SL_20-427_Official |
| Thomas     | Tynes      | jjazynka@energyfreedomcoalition.com | Energy Freedom Coalition of America              | 101 Constitution Ave NW<br>Ste 525 East<br><br>Washington,<br>DC<br>20001         | Electronic Service | No                | OFF_SL_20-427_Official |
| Lisa       | Veith      | lisa.veith@ci.stpaul.mn.us          | City of St. Paul                                 | 400 City Hall and Courthouse<br>15 West Kellogg Blvd.<br>St. Paul,<br>MN<br>55102 | Electronic Service | No                | OFF_SL_20-427_Official |
| Samantha   | Williams   | swilliams@nrdc.org                  | Natural Resources Defense Council                | 20 N. Wacker Drive<br>Ste 1600<br>Chicago,<br>IL<br>60606                         | Electronic Service | No                | OFF_SL_20-427_Official |
| Joseph     | Windler    | jwindler@winthrop.com               | Winthrop & Weinstine                             | 225 South Sixth Street,<br>Suite 3500<br><br>Minneapolis,<br>MN<br>55402          | Electronic Service | No                | OFF_SL_20-427_Official |
| Mary       | Wolter     | mary.wolter@wecenergygroup.com      | Minnesota Energy Resources Corporation (HOLDING) | 231 West Michigan St<br><br>Milwaukee,<br>WI<br>53203                             | Electronic Service | No                | OFF_SL_20-427_Official |
| Patrick    | Zomer      | Patrick.Zomer@lawmoss.com           | Moss & Barnett a Professional Association        | 150 S. 5th Street, #1200<br><br>Minneapolis,<br>MN<br>55402                       | Electronic Service | No                | OFF_SL_20-427_Official |