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March 31, 2021

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

*RE: Annual Compliance Submission of CenterPoint Energy Minnesota Gas, A
Division of CenterPoint Energy Resources Corp., for its Gas Affordability Service
Program; MPUC Docket No. G-008/M-21-_____*

Dear Mr. Seuffert:

Enclosed for filing is CenterPoint Energy's annual Gas Affordability Program ("GAP") report.

If you have any questions regarding the information provided in this filing, please contact me at (612) 321-4625.

Sincerely,

/s/

Amber S. Lee
Director, Regulatory Affairs

Enclosure
cc: Service List

STATE OF MINNESOTA

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie Sieben	Chair
Valerie Means	Commissioner
Matt Schuerger	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

Annual Compliance Submission of
CenterPoint Energy Minnesota Gas,
A Division of CenterPoint Energy Resources
Corp., for its Gas Affordability Service Program

Docket No.: G-008/M-21-_____

COMPLIANCE FILING

1. Introduction

CenterPoint Energy Minnesota Gas (“CenterPoint Energy” or the “Company”) provides this annual report on the status of its Gas Affordability Service Program (“GAP” or “Program”). The information provided in this filing is based on the information the Company committed to provide in its June 6, 2006 Reply Comments in Docket No. G-008/GR-05-1380 and includes the additional information required by subsequent Commission Orders.¹ Section 5.2 of the Company’s GAP tariff (Section V, p. 25.a) states that “(t)he annual reports will include the effect of the Program on customer payment frequency, payment amount, arrearage level and number of customers in arrears, service disconnections, retention rates, customer complaints and utility collection activity.”

To provide further assistance to our low-income customers during these difficult times, the Company is proposing a reduction in payment requirements to 3% of participant income, down from the current level of 6%.

The Company is also proposing a slight increase in the GAP surcharge rate from \$0.00236 per therm to \$0.00264 per therm. The Company projects that changing the GAP rate to \$0.00264 per therm on October 1, 2021 will result in a \$0 tracker balance by the end of 2022. This proposal is discussed further in Section 24.

The Company also wishes to notify the Commission and interested stakeholders that it has decided to not renew its contract with Energy Cents Coalition (“ECC”) for administration of the GAP program. The Company believes that it can move administration in house and reduce program costs. The Company is grateful to ECC for

¹ See Schedule C for a summary table of the Orders 2011 through 2020.

their work administering GAP and looks forward to continuing to partner with them on the Conservation Improvement Program Low-Income Rental Efficiency project.

CenterPoint Energy's GAP is available to residential customers who receive Low Income Home Energy Assistance Program ("LIHEAP") assistance during the federal fiscal year, agree to be placed on a levelized payment plan, and qualify for an affordability and/or arrearage forgiveness credit under the terms of the Program.² Customers will be removed from the Program if they fail to pay two consecutive monthly payments in full. To help maintain participation levels, after one missed payment, CenterPoint Energy calls GAP participants as a reminder of the payment requirements for the Program.³

The following schedules are attached to this filing:

- Schedule A provides a summary of the GAP Annual Compliance Report information as requested by the Commission's September 24, 2013 Order in Docket No. G-008/GR-05-1380;
- Schedule B shows the impact of the Program on bad debt expense;
- Schedule C is a summary table of additional reporting requirements established by Orders issued from 2011 through 2020;
- Schedule D provides the streamlined GAP reporting summary ordered by the Commission on September 28, 2018.⁴
- Schedule E 2021 GAP Tracker Actual/Forecast activity and balances.
- Schedule F 2022 GAP Tracker Forecast activity and balances.
- Schedule G shows the calculation of the proposed GAP rider rate.

2. Total Affordability Credit

The total of the affordability credits applied to GAP participant accounts during 2020 was \$2,678,718.

3. Total Arrearage Forgiveness Credit

The total of the arrearage forgiveness credits applied to GAP participant accounts during the 2020 Program year was \$592,278.

4. Total Program Administration Cost

The total administrative expenses incurred in 2020 were \$400,324, approximately 10.9% of total Program costs. Because the total administrative expenses exceeded the 5% cap

² CenterPoint Energy GAP tariff, Section V, p. 25.

³ Docket No. G-008/M-05-1380. Order Accepting Gas Affordability Program Reports and Requiring Further Action, p. 4 (December 29, 2011).

⁴ Docket No. G-008/M-16-486. Order Accepting Report and Adopting Streamlined Process, p. 2 (September 28, 2018).

(see Section V, Page 25.a, Section 4.1 of the GAP tariff), an adjustment was made to the tracker account to reflect only \$183,566 of administrative expenses. The following calculation was made to remove the administrative costs in excess of 5% of total Program costs from the tracker account.

Table 1. Program Administration Costs

1. Start-up costs:	\$0
2. Affordability component:	\$2,678,718
3. Arrearage Forgiveness component:	\$592,278
4. <u>Incremental admin costs incurred:</u>	<u>\$400,324</u>
5. Subtotal (sum of lines 1–4)	\$3,671,320
6. 5% of subtotal (line 5 multiplied by 5%):	\$183,566
7. Incremental admin costs above 5% (line 4 minus line 6 or \$0):	\$216,758
8. Incremental admin costs in Tracker (line 4 less line 7):	\$183,566

This calculation is consistent with the March 31, 2020 report in Docket No. G008/20-399, consistent with the Commission’s November 5, 2020 Order Approving Gas Affordability Program Reports and Modifying Certain Surcharges, Funding, and Reporting Requirements in that docket.

5. Total Start-up Costs

No start-up costs were incurred in 2020.

6. Incremental LIHEAP

As described in the response to Commission Information Request No. 21 in Docket No. G008/GR-05-1380, the incremental LIHEAP is calculated both in total and on an average participant basis as shown below. Please note that because the LIHEAP year and the GAP year do not correspond exactly, a customer that received LIHEAP in one LIHEAP year may qualify for participation in a different GAP year (i.e., a customer may have received LIHEAP in October 2019 and qualified for both the 2019 and 2020 GAP years).

Table 2. GAP Participant LIHEAP

line	GAP Year	2015	2016	2017	2018	2019 ⁵	2020 ⁶
1	GAP participants who received LIHEAP (October prior year through September current year)	10,074	7,451	7,419	6,988	8,237	5,696
2	LIHEAP received by GAP participants	\$3,691,276	\$2,572,910	\$2,553,746	\$2,795,147	\$3,217,831	\$2,032,067
3	Average amount (line 2 divided by line 1)	\$366	\$345	\$344	\$400	\$391	\$357
4	GAP participants who received LIHEAP (October current year through September subsequent year)	8,638	6,404	6,442	7,246	5,828	4,309
5	LIHEAP received by GAP participants	\$2,883,647	\$2,245,304	\$2,575,441	\$2,866,176	\$2,082,198	\$1,429,618
6	Average amount (line 5 divided by line 4)	\$334	\$351	\$400	\$396	\$357	\$332
7	Total incremental LIHEAP (line 5 minus line 2)	-\$807,629	-\$327,606	\$21,695	-\$71,029	-1,135,633	-\$602,449
8	Average incremental LIHEAP (line 6 minus line 3)	-\$33	\$5	\$56	-\$4	-\$33	-\$25

⁵ The 2019 GAP year information (for participants receiving 2019-2020 LIHEAP) has been updated from last year's compliance filing since the 2019-2020 LIHEAP year was not finished and not all payments were received on behalf of customers receiving LIHEAP grants when last year's compliance filing was made.

⁶ Because the 2020-2021 LIHEAP year is not finished, the information on Year 2020 GAP participants is incomplete and will be updated in the next annual report.

7. Bad Debt Expense and Adjusted Bad Debt Factor

A. Bad Debt Factor

Similar to previous annual compliance reports, information is presented below that considers the effects of the Program on the bad debt factor. As described in the response to Commission Information Request No. 24 in Docket No. G008/GR-05-1380, the adjusted bad debt factor (the bad debt factor is determined by dividing bad debt expense by firm revenue) considers the effects of the arrears forgiveness credits from the Program on bad debt by calculating what bad debt expense and the resulting bad debt factor would have been, without the arrears forgiveness credits and arrears payments from participants, everything else being equal. Please keep in mind that the write-off percentage used in line 8 is based on all CenterPoint Energy customers.

Table 3. Bad Debt Factor

1. Actual 2020 Bad Debt Expense:	\$4,836,086
2. Firm Revenue:	\$830,799,659
3. Bad Debt Factor (line 1 divided by line 2):	0.6%
4. Impact of the Program	
5. Total Payments towards Arrears Rec'd from participants:	\$104,515
6. Total Arrearage Forgiveness Credits Applied:	<u>\$592,278</u>
7. Total payments applied to arrears (line 5 + line 6):	\$696,793
8. Percentage of Pre-Program Arrears that would have been written-off (from Section 8, below):	0.6%
9. Impact of Arrearage Forgiveness Component on write-offs (line 7 multiplied by line 8):	\$4,190
10. Impact of Program on Bad Debts	
11. Bad Debt Expense without Arrearage Forgiveness Component (line 1 plus line 9):	\$4,840,276
12. Adjusted Bad Debt Factor (line 11 divided by line 2):	0.6%

B. Bad Debt Expense

In addition to the impact on the bad debt factor presented above, the May 31, 2013 GAP Evaluation and the June 1, 2016 GAP Evaluation examined the impact of the Program on bad debt expense by the reduction in the accounts receivable balance for GAP participants. This reduction was attributed to the GAP credits themselves and to an apparent improvement in the payment behavior of GAP participants. The impact on bad debt expense of the Program is summarized below and shown in Schedule B.

Table 4. Bad Debt Expense

1.	Difference in total request amount paid	\$514,136
2.	Incremental LIHEAP—estimate ⁷	(\$541,192)
3.	Total GAP credits	<u>\$3,270,996</u>
4.	Change in customer payments, LIHEAP & GAP credits	\$3,243,940
5.	Change in A/R balance	(\$3,243,940)
6.	Change in Bad Debt Expense ⁸	(\$19,464)

8. Arrearage to Write-Off Study

As described in CenterPoint Energy’s June 6, 2006 Reply Comments in Docket No. G-008/GR-05-1380, a study was conducted to look at the relationship of write-offs to arrears. The information below is based on the 12 months ending December 2020 for *all* CenterPoint Energy customers and not just customers that are eligible or that participate in GAP. It is not known how the GAP eligible or GAP participants’ ratio of write-off to arrearage (or final bill) compares to non-GAP eligible or non-GAP participant customers.

A. Write-Off/Arrears Percentage

The following table shows the write-off to arrears percentage by comparing the write-offs to arrears using a three-month lag. For example, the September arrears are compared to the December write-offs to show that the amount that was written off in December 2020 was 0.1% of the amount of September arrears. In 2019, the amount written off in December 2019 was 5.0% of September arrears. This reduction is due to the suspension of disconnection and dunning activities in response to the COVID-19 pandemic resulting in a reduction of write-offs.

⁷ Average of total incremental LIHEAP 2007–2019 from Section 6. The 2007 pilot Program was a half year.

⁸ Calculated using the Write-Off/Arrears percentage from Section 8.

Table 5. Ratio of Write-Offs to Arrears

2020	Write-Off / Arrears Percentage
January	3.2%
February	7.9%
March	2.1%
April	0.2%
May	0.3%
June	0.3%
July	0.1%
August	0.2%
September	0.2%
October	0.1%
November	0.1%
<u>December</u>	<u>0.1%</u>
12 Month Average	0.6%

B. Write-Off/Final Bill Percentage

The following table shows the write-off to final bills percentage by comparing the write-offs to final bills using a three-month lag. For example, the September final bills are compared to the December write-offs to show that the amount that was written off in December 2020 was 0.8% of the amount of September final bills. In 2019 the amount written off in December 2019 was 11.9% of September final bills. This reduction is due to the suspension of disconnection and dunning activities in response to the COVID-19 pandemic resulting in a reduction of write-offs.

Table 6. Ratio of Write-Offs to Final Bills

2020	Write-Off / Final Bill Percentage
January	9.9%
February	14.1%
March	7.1%
April	1.1%
May	1.7%
June	1.4%
July	0.8%
August	1.2%
September	1.3%
October	0.5%
November	0.4%
<u>December</u>	<u>0.8%</u>
12 Month Average	3.3%

9. Customer Payment History and Frequency Study

In accordance with the Commission’s May 22, 2017 Order in Docket No. G-008/16-486, the following table shows the payment frequency and history of GAP participants in 2020, compared to the payment frequency and history of LIHEAP non-GAP customers in 2020 (pre-Program baseline method) and the payment frequency and history of 2020 GAP participants prior to their enrollment in the Program (non-GAP LIHEAP method). Finally, we have also included this payment information for non-LIHEAP residential customers. A summary of this information is also provided in Schedule D.

Table 7. Customer Payment History and Frequency

	2020 GAP Participants		2020 LIHEAP non-GAP Participants		2020 GAP Participants: 12 Months Prior		2020 non-LIHEAP Residential Customers	
	<i>Amount</i>	<i>Count</i>	<i>Amount</i>	<i>Count</i>	<i>Amount</i>	<i>Count</i>	<i>Amount</i>	<i>Count</i>
Total Req	\$4,321,369	48,879	\$27,773,652	354,066	\$10,047,396	67,632	\$552,954,605	8,588,328
Full Pmt Made	\$614,359	12,798 (26%)	\$5,846,511	109,388 (31%)	\$1,090,968	19,857 (29%)	\$371,032,260	6,069,074 (71%)

	2020 GAP Participants		2020 LIHEAP non-GAP Participants		2020 GAP Participants: 12 Months Prior		2020 non-LIHEAP Residential Customers	
Partial Pmt Made	\$686,439	12,273 (25%)	\$3,994,326	63,806 (18%)	\$789,389	12,036 (18%)	\$120,220,458	1,740,867 (20%)
On Acct Pmts	\$139,210	4,246 (9%)	\$155,667	3,650 (1%)	\$47,446	1,398 (2%)	\$1,704,873	24,000 (0.3%)
Total Pmts	\$1,440,008 (33%)	29,317 (60%)	\$9,996,504 (36%)	176,844 (50%)	\$1,927,803 (19%)	33,291 (49%)	\$492,957,591 (89%)	7,833,941 (91%)
No Pmt Made	\$0	68,462 (40%)	\$0	177,222 (50%)	\$0	34,341 (51%)	\$0	754,387 (9%)

10. Average Cost to Disconnect and Reconnect

As described in the Company's June 6, 2006 Reply Comments in Docket No. G-008/GR-05-1380, information on the average cost to disconnect and reconnect an individual meter is provided. The Company notes that due to the disconnection moratorium that went into effect in March 2020, there were many fewer disconnections in 2020 than in prior years. As a result, the average costs provided below are in some cases different than what the Company has experienced in prior years.

- A. For a locked meter, based on historical activity, the average cost to disconnect and reconnect a meter was approximately \$54. Please note that this is an average and does not include the cost of a protective agent that may have been used.
- B. For a meter that is "plugged," based on historical activity, the average cost was approximately \$74. Please note that this is an average and does not include the cost of a protective agent that may be used.
- C. For a meter that is shut off by using a valve lock at the curb, the average cost was approximately \$961. This is calculated based on average internal costs to disconnect and reconnect.
- D. In 2020, there were no disconnections and no reconnections performed by hand digging. Therefore, it is not possible to calculate an average cost to disconnect and reconnect a meter that is shut off by "hand digging" in the yard.
- E. For a meter that is shut off by digging at a boulevard or curb, the average cost was approximately \$684. This is calculated based on cost information from contractors,

internal costs and expected time to reconnect meters that have been dug at a curb and includes restoration costs based on 2020 activity.

F. In 2020 there were no disconnections or reconnections for a meter that is shut off by digging in the street. Therefore, it is not possible to calculate the average cost in 2020 for such work.

11. Average Payment Amount

During the 2020 GAP year, there were 9,179 participants (including the customers who participated during the year but dropped out of the Program before the end of the year). Additionally, not all customers were requested to make an affordability component payment (those that had zero income) and/or an arrearage component payment (those that did not have pre-Program arrears). The table below presents average payment amount information on the groups of customers described above.

Table 8. Average Payment Amounts

line		Customers	Avg Monthly Affordability Pmt	Avg Monthly Arrearage Pmt	Total Pmt
1	All customers on GAP	9,179	\$39.01	\$3.08	\$42.81
2	Customers on GAP asked to make payment	8,615	\$41.57	\$4.05	N/A ⁹

The November 18, 2009 Order in Docket No. G-008/GR-05-1380 required that all gas utilities report (starting with the annual report filed in 2010) the average annual and monthly bill credit amount in the utility's annual GAP reports. In addition, a comparison of these amounts to the average GAP participant's annual and average monthly bill and arrearage amount was also required. That information is shown below for the 9,179 customers who participated in GAP in 2020.

⁹ A total is not presented for the subset of customers requested to make a payment since not all customers were requested to make both an affordability component payment (those that had zero income) and/or an arrearage component payment (those that did not have pre-Program arrears).

Table 9. Average Affordability and Arrearage Credits

	Monthly	Annual
Average Affordability Credit ¹⁰	\$26.39	\$316.66
Average Arrearage Credit ¹¹	\$18.68	\$224.11
Average Affordability Component bill ¹²	\$39.01	\$468.15
Average Arrearage Component bill ¹³	\$3.80	\$45.62
Average Pre-Program Arrears ¹⁴	\$376.51	

12. Arrearage Level

As described in the June 6, 2006 Reply Comments in Docket No. G-008/GR-05-1380, information on the average pre-Program arrearage amount of Program participants is provided. Information on pre-Program arrears for the customers that participated at the end of the year as well as customers that participated during the year, but dropped, is shown in the table below.

Table 10. Arrearage Levels

Customer Group	Customers	Total Pre-Program Arrears	Average Pre-Program Arrears
All customers on GAP	9,179	\$1,199,559	\$131
All customers on GAP that had Pre-Program Arrears	3,186	\$1,199,559	\$377

The November 18, 2009 Order in Docket No. G-008/GR-05-1380 required that all gas utilities report (starting with the annual report filed in 2010) the change in arrearage level for the average GAP customer compared to the LIHEAP customers that are not enrolled

¹⁰ The average monthly affordability credit is calculated by taking the total of the monthly affordability credits for the customers on the Program during 2020 and dividing by the total number of GAP participants during the year. This is the same type of average as in line 1 (Table 10), above. The annual average is the monthly number times 12 months.

¹¹ The average monthly arrearage credit is calculated by taking the total of the monthly arrearage credits for the customers on the Program during 2020 and dividing by the total number of GAP participants during the year. This is the same type of average as in line 1 (Table 10), above. The annual average is the monthly number times 12 months.

¹² The average monthly affordability component bill amount is from line 1 (Table 10), above. The annual average is the monthly number times 12 months.

¹³ The average monthly arrearage component bill amount is from line 2 (Table 10), above. The annual average is the monthly number times 12 months.

¹⁴ This is the average pre-Program arrears for the 3,186 GAP participants who were on the GAP during the year and had a pre-Program arrearage amount.

in the GAP and the average level of arrearage for all of the utility's residential customers that had arrears.

Table 11. Change in Arrears

Customer Group	Jan. 2020	Dec. 2020	\$ Change	% Change
GAP ¹⁵	\$254	\$237	-\$17	-7%
LIHEAP non-GAP	\$170	\$248	\$78	46%
Residential	\$143	\$209	\$66	46%

As required by the Order dated May 22, 2017 in Docket No. G-008/M-16-486, the Company is also providing average arrears balances using the pre-Program-baseline approach as described in the Department's Comments of December 13, 2016.¹⁶

Table 12. Average Arrears Balances

Average Arrearage Level	January 2020	December 2020
GAP Participants ¹⁷	\$153	\$183
LIHEAP Customers Not Enrolled in GAP ¹⁸	\$169	\$322
All Residential Customers ¹⁹	\$142	\$352

13. Number of Customers in Arrears

In the Company's June 6, 2007 Reply Comments in Docket No. G-008/GR-05-1380, it committed to provide information on the total number of customers in arrears at the start of the Program. As reported in the monthly Cold Weather Rule Report, there were 68,086 residential customer accounts past due at the end of December 2019, which is the approximate start of the 2020 Program year. Of the 9,179 customers that participated in the Program during the 2020 Program year, 3,186 started their 2020 GAP participation with a pre-Program arrears balance.

¹⁵ The average arrears amount shown for GAP participants above is for the GAP participants that had arrears during January and those that had arrears during December of 2020. It should be noted that, due to changes in the customers that participate (due to de-activations and new enrollments during the year), not all of the customers enrolled in January are the same customers enrolled in December.

¹⁶ See Docket No. G-008/M-16-486; CenterPoint Energy's Evaluation of its Gas Affordability Program.

¹⁷ The average arrearage level for GAP Participants is the active GAP participants (with arrears) at January 2020, who remained an active GAP participant in January 2020 and December 2020.

¹⁸ The average arrearage level for LIHEAP Customers Not Enrolled in GAP are the LIHEAP customers not enrolled in GAP (with arrears) at January 2020, who remained a LIHEAP customer in the remaining period of December 2020.

¹⁹ The average arrearage level for All Residential Customers is all residential customers (with arrears) at January 2020, who remained a residential customer in December 2020.

14. Service Disconnections

As reported in the monthly reports filed pursuant to Minnesota Statute §216B.091 in Docket No. E,G999/PR-19-02, there were 2,640 residential accounts disconnected for non-payment during 2020.

The November 18, 2009 Order in Docket No. G-008/GR-05-1380 required that all gas utilities report (starting with the annual report filed in 2010) the percentage of GAP customers disconnected compared to the percentage of all firm customers disconnected. In addition, the Commission required utilities to report a comparison of the percentage of GAP customers disconnected to the percentage of disconnected LIHEAP customers that do not participate in GAP.

Table 13. Customer Disconnection Rates

Customer Group	% Disconnected
GAP Customers ²⁰	0.8%
LIHEAP Non-GAP ²¹	1.2%
Total Firm Customers ²²	0.3%

²⁰ The percent of GAP customers disconnected is the number of customers that had been on GAP during 2020 before subsequently being removed (or deactivated) from the Program and then disconnected, divided by the total number of customers that were enrolled during the year.

²¹ The percent of LIHEAP non-GAP customers disconnected is the number of customers that received LIHEAP (and did not participate in GAP) during 2020 and were disconnected after receiving LIHEAP in 2020, divided by the number of customers that received LIHEAP (and did not participate in GAP) in 2020. It should be noted that the LIHEAP year is not a calendar year so that if a customer received LIHEAP in early 2020 as part of the end of the 2019–20 LIHEAP year, they would be included in this group—along with customers receiving LIHEAP in late 2020 as part of the 2020–21 LIHEAP year.

²² The percent of total firm customers disconnected is the number of involuntary disconnections of residential customers as reported in the 2020 monthly reports submitted pursuant to Minnesota Statutes §216B.091 and §216B.096, subd.11 plus the number of firm commercial/industrial accounts disconnected divided by the average number of firm customers in 2020.

As described in the Order dated May 22, 2017, the Company provides in Table 14 the disconnection rates using the pre-Program-baseline approach as described in the Department’s Comments of December 13, 2016²³ (tracks “disconnections for individual customers or a cohort of customers and then reporting pre- and post- Program disconnection rates”).

Table 14. Disconnection Rates (Pre-Program Baseline)

2020 Customers:	Total Disconnections	Percent of Total Customer Group
GAP	69	0.8%
Before GAP	0	0.0%
After GAP	69	0.8%
LIHEAP (no GAP)	173	1.2%
Before LIHEAP	171	1.2%
After LIHEAP	2	0.0%

15. Retention Rate – Renewal

As reported in Table 11 of the GAP Annual Report submitted April 1, 2019 in Docket No. G-008/M-19-255, there were approximately 8,600 customers who received a GAP credit and enrolled in the GAP at the end of 2018. The table below shows the Program year participation information for the customers that were enrolled at the end of the previous year.

Table 15. GAP Customer Retention - Renewal

Description	2019 Count	2019 %	2020 Count	2020 %
Renewed within 30 days	5,240	61%	4,494	52%
Enrolled in 31–60 days	442	5%	993	12%
Enrolled in 61–90 days	143	2%	150	2%
Enrolled in 91–150 days	364	4%	287	3%
Enrolled in 151 days	411	5%	334	4%
Application Rejected: no LIHEAP, incomplete GAP application, etc.	254	3%	308	4%
Did not apply, other	1,762	20%	2,002	23%
Total	8,616	100%	8,568	100%

²³ See Docket No. G-008/M-16-486; CenterPoint Energy’s Evaluation of its Gas Affordability Program.

The retention rate for the 2021 GAP year is not available because some customers enrolled at the end of the 2020 year have not yet renewed. This information will be provided in the next annual compliance report, after the 2021 year is complete.

16. Retention Rate – Attrition

The following table shows the number of GAP participants in the Program at the end of each Program year, participants deactivated from GAP, and participants not accepted into the Program.

Table 16. GAP Customer Retention – Attrition

GAP year	2015	2016	2017	2018	2019	2020
GAP participants at year-end	10,769	8,558	8,720	8,616	7,935	8,442
Total deactivated and percent of final participation	3,020 28%	2,123 25%	1,863 21%	2,036 24%	2,949 37%	712 8%
Deactivated due to delinquency	2,092 19%	1,429 17%	1,128 13%	1,368 16%	2,091 26%	30 0.4%
Deactivated due to customer request	67 0.6%	34 0.4%	39 0.4%	29 0.3%	37 0.5%	25 0.3%
Deactivated due to customer move	861 8%	660 8%	696 8%	639 7%	821 10%	657 7.8%
Applied but not accepted due to no benefit ²⁴	2,071	3,514	1,664	1,658	1,970	2,641

17. Participation/Incremental LIHEAP

As described in CenterPoint Energy’s June 6, 2006 Reply Comments in Docket No. G-008/GR-05-1380, information on the number of new participants that did not previously receive LIHEAP is provided.

²⁴ Based on their income and usage, there was no affordability or arrearage credit for these customers.

Table 17. Number of New Participants Not Previously Receiving LIHEAP

GAP year	2015	2016	2017	2018	2019	2020
GAP participants at year-end	10,769	8,558	8,720	8,616	7,935	8,547
Approximate % who did not receive LIHEAP in prior year	17%	21%	17%	21%	18%	18%

18. Customer Complaints

There was one GAP customer complaint reported to the Commission during the 2020 GAP year.

In March, a customer contacted the Company stating that LIHEAP payments should be allocated to the current GAP charge and not towards the customer's past due balance/GAP Arrears. The Company explained that per the tariff the customer must make monthly GAP payments to remain on program.

19. Program Cost per Customer

As described in the Company's June 6, 2006 Reply Comments in Docket No. G-008/GR-05-1380, the Company provides a measurement of the total Program costs divided by the total number of Program participants. Please note that for the purpose of this calculation, the number of participants during 2020 is used, although not all customers participated for the same number of months.

Table 18. Program Cost Per Participant

1. Affordability Credits:	\$2,678,718
2. Arrearage Forgiveness Credits:	\$592,278
3. <u>Administrative Cost:</u>	<u>\$183,566</u>
4. Total Program Costs (lines 1–3):	\$3,454,562
5. Program Participants:	9,179
6. Program Cost per participant (line 4 divided by line 5):	\$376

20. Payment Coverage

As described in the Company's June 6, 2006 Reply Comments in Docket No. G-008/GR-05-1380, 'payment coverage' is calculated as the total annual customer payments divided by the total annual amount billed. As such, it does not include any LIHEAP amounts received on behalf of the customer or any GAP credits applied to the accounts.

Table 19. Payment Coverage

1. Total Affordability Customer Payments Rec'd	\$1,293,120
2. <u>Total Arrears Customer Payments Rec'd</u>	<u>\$104,515</u>
3. Total Customer Payments (line 1 plus line 2)	\$1,397,636
4. Total Affordability Requested	\$6,295,648
5. <u>Total Arrears Requested</u>	<u>\$275,314</u>
6. Total amount billed (line 4 plus line 5)	\$6,570,962
7. Payment coverage (line 3 divided by line 6)	0.21

21. Arrears Reduction Rate

As described in the Company's June 6, 2006 Reply Comments in Docket No. G-008/GR-05-1380, the 'arrears reduction rate' is calculated as the total LIHEAP and arrears forgiveness payments divided by the total outstanding balance at the start of the Program year. It should be noted that for the GAP participants that did not have pre-Program arrears, any LIHEAP payments received were applied to their current (affordability component) bills so the arrears reduction calculation below is overstated at greater than one.

Table 20. Arrears Reduction Rate

1. Total LIHEAP Received (2020 Participants 1/20–12/20)	\$3,717,229
2. Arrears Forgiveness Customer Payments Rec'd	\$104,515
3. <u>Arrears Forgiveness Credits Applied</u>	<u>\$592,278</u>
4. Total Reduction to Arrears (Line 1 plus Line 2 plus Line 3)	\$4,414,022
5. Total Pre-Program Arrears Balance at Start of Program	\$1,199,559
6. Arrears Reduction Rate (line 4 divided by line 5)	3.68

22. Coordination with Other Resources

Throughout the year, the Company engages in outreach efforts designed to promote GAP and Conservation Improvement Program ("CIP") participation, often in partnership with low-income organizations and agencies. This section summarizes efforts undertaken by the Company to coordinate the GAP with other low-income and conservation resources, in accordance with the Commission's November 18, 2009²⁵ and

²⁵ Docket No. G-008/GR-05-1380. Order Accepting Compliance Filings Regarding Gas Affordability Programs and Requiring Further Action, Nov. 18, 2009 (requiring that future reports include how each utility has coordinated its GAP with other available low income and conservation

November 22, 2010²⁶ Orders. The summary begins with a description of internal cross-promotion activities between GAP and CIP. This is followed by a list of CIP conservation measures available to low-income customers. Finally, a list of major outreach efforts conducted with outside agencies to promote GAP and CIP are presented. The Company notes that we have been providing quarterly reports on GAP outreach efforts in Docket No. G-008/M-19-367 in compliance with Commission Orders in Docket Nos. G-008/M-20-399 and G-008/M-19-367.

Internal Cross-Promotional Efforts between CIP and GAP

CenterPoint Energy coordinates and cross-promotes its GAP and CIP. All low-income and residential conservation measures are available to GAP customers. Participation in CIP by low income customers is tracked and reported in the annual CIP status report.

Summary of major cross-promotional GAP and CIP efforts:

- Between January 2020 and December 2020,
 - the Company sent over 25,000 direct mail pieces to LIHEAP recipients encouraging customers to enroll in GAP. Mailers include a letter describing what GAP is and how it works, a GAP application, detailed energy efficiency tips, and information about CenterPoint Energy's rebate and other programs, including the Home Energy Squad, and weatherization services. Home Energy Squad visits are free of charge to low income customers.
 - E-mailed over 33,000 GAP solicitations that included links to the GAP application as well as to the *More Comfort, Less Energy* booklet with energy saving tips.
 - Performed 77,000 live or automated calls directed at customers not previously enrolled in LHEAP, enrolled in LIHEAP but not in GAP, or had past due balances that met certain parameters to inform and encourage enrollment in GAP.
- *CIP Conservation Calendars* with energy efficiency tips were distributed to income-qualified customers via low income agencies and non-profit affordable housing agencies.
- *More Comfort, Less Energy* booklets with energy-saving tips and how-to instructions were distributed to low income households via low income agencies.

resources, including the names of the agencies, the content of the communication, and the accomplishments resulting from the coordination).

²⁶ Docket No. G-008/GR-05-1380. Order Evaluating Gas Affordability Program, Extending and Modifying Pilot Program, Authorizing Cost Recovery, and Requiring Future Reporting, Nov. 22, 2010 ("CenterPoint shall, in future reporting, report the potential no-, low-, and mid-cost conservation measures that could be implemented in the households of GAP participants, along with CenterPoint's plans to encourage GAP participants to increase their use of these measures.").

No Cost Energy Efficiency Measures Available to GAP Participants

The following measures are available at no cost to low-income customers through CenterPoint Energy's Conservation Improvement Program:

- Weatherization (including wall and attic insulation);
- Furnace or boiler repair/replacement/tune-up;
- Water heater replacement;
- Programmable thermostats;
- Weather stripping and caulk;
- Window film;
- Water heater blankets;
- Outlet and switch plate gasket covers;
- High-efficiency showerhead and faucet aerators;
- Water heater temperature assessment and adjustment;
- Pipe insulation;
- Attic and wall insulation inspection;
- Blower door test;
- Thermal image testing;
- Combustion safety test;
- Carbon monoxide check; and
- Carbon monoxide alarm.

In addition, GAP participants can implement the following no-cost measures at their homes on their own:

- Lowering thermostat and/or programming a programmable unit;
- Changing furnace filters regularly;
- Lowering water heater setting;
- Opening and closing drapes according to season and time of day; and
- Maintaining open air flow around heating registers.

Cross-Promotion of LIHEAP and CIP in Coordination with Partnership Organizations

CenterPoint Energy maintains relationships with partnership organizations through continuous communication and has ongoing efforts to reach low-income customers by attending community events with the purpose to assist and educate low-income customers with options available to help pay their natural gas bills, including GAP.

CenterPoint Energy communicates throughout the year with partnering organizations. Some of the organizations with which the Company partners include:

- Community Action Partnership of Hennepin County - is the federally designated community action program for Hennepin County.
- Tri-County Action Program, Inc. - the federally designated community action program for Benton, Sherburne, and Stearns counties in central Minnesota.

- Lutheran Social Services of Minnesota - The Center for Changing Lives – is a non-profit organization with a wide range of services for community members to connect and find resources.
- The Twin Cities Salvation Army – a non-profit organization that assists residents across Minneapolis, St. Paul, and the greater metro area including utility assistance.
- Parents in Community Action, Inc. - a private non-profit agency designated by the federal government to operate Head Start and Early Head Start programs in Hennepin County.
- Phillips West Neighborhood Organization - a non-profit organization that supports community and neighborhood development, as well as economic development.

In 2020, CenterPoint Energy engaged community partners in using the Company's new Minnesota Community Profile Dashboard tool to identify and discuss residential CIP participation trends across community demographics. The Dashboard maps, by census tract, multiple data sets such as: average natural gas energy use, U.S. Census Demographic data, % of residential customers who participated in CIP by census tract, and % of customers who participated in LIHEAP by census tract. The purpose of the data produced by the Dashboard is to inform the Company and company partners in development of strategies to increase participation in CIP, including but not limited to low income programs. In 2020, the Company met to share and discuss data generated by the Dashboard with the following community partners:

- Center for Energy & Environment – Program implementer for Home Energy Squad
- City of Bloomington,
- City of Edina,
- City of Saint Louis Park, and
- Minneapolis Energy Vision Advisory Committee

23. Outreach, Participation, and Usage

As Ordered in the Commission Order filed on November 5, 2020 in Docket No. G-008/M-20-399, the Commission Ordered the Company to provide the costs for associated with additional outreach for LIHEAP and GAP, the monthly number of LIHEAP and GAP customers compared to the same months in the previous three years, and the average annual and low to high range of LIHEAP and GAP customer natural gas usage levels.

As reported in the quarterly Compliance filings of Docket 19-367 costs of automatic dialer calls and emails have low costs to the business as the technology is already in place. Incremental costs associated with additional outreach efforts include:

- \$20,516 for 25,338 mailings performed from February through June 2020.
- \$5,532 for the 3,268 calls in July 2020.
- \$5,083 for the 3,010 calls made from July 2020 through September 14, 2020.
- \$15,648 for the 10,422 calls from July 2020 through December 14, 2020.

The monthly 2017 through January 2021 LIHEAP customer counts are identified in Table 21, while the GAP information is included in Table 22.

Table 21. LIHEAP Customers

	January	February	March	April	May	June	July	August	September	October	November	December
2021	2,694											
2020	4,247	2,658	1,586	934	763	800	1,116	23	N/A	1	6,425	3,921
2019	3,784	1,797	1,685	1,712	1,482	649	98	-	-	3	7,780	3,328
2018	2,119	2,616	2,127	1,658	1,543	647	100	-	-	4	10,115	3,961
2017	4,766	2,273	1,862	1,659	461	944	77	3	-	53	8,979	3,859

Table 22. GAP Customers

	January	February	March	April	May	June	July	August	September	October	November	December
2021	4,600											
2020	5,733	6,343	6,983	7,957	8,842	9,477	9,901	8,853	8,888	8,899	8,888	8,852
2019	6,667	7,434	8,420	8,672	9,652	10,233	9,829	9,813	9,518	9,113	8,621	8,583
2018	6,150	6,829	7,846	8,523	9,325	9,710	9,436	9,585	9,482	9,554	9,604	9,559
2017	5,974	6,563	7,536	8,124	9,461	9,863	9,767	9,531	9,512	9,524	9,555	9,521

Natural gas annual average and usage range for LIHEAP customers is provided in Table 23, while GAP customer usage is provided in Table 24.

Table 23. LIHEAP Customer Usage (Therms)

	2015	2016	2017	2018	2019	2020
Average	780.0	744.0	804.0	936.0	928.8	828.0
Low	-	-	-	-	-	-
High	7,564.8	6,823.2	4,689.6	9,186.0	9,126.0	8,570.4

Table 24. GAP Customer Usage (Therms)

	2015	2016	2017	2018	2019	2020
Average	900.0	864.0	924.0	1,068.0	1,068.0	943.2
Low	-	-	-	-	-	-
High	7,564.8	6,192.0	6,637.2	6,891.6	6,552.0	6,081.6

24. GAP Surcharge Annual Adjustment and Proposed Program Change

The Commission's August 19, 2019 Order in Docket No. G-008/M-19-255 authorized CenterPoint Energy to commence treating the GAP surcharge as a rate that may be adjusted annually based on forecasted GAP expenditures and rate case approved sales.

As shown in Schedule E, the 2021 forecasted year-end over-recovered amount is \$765,875. Continuing through a forecasted year 2021, as shown in Schedule F, a per therm charge implemented as of October 1, 2021 of \$0.00264 per therm would result in a near zero GAP Tracker balance at the end of 2022. These figures are calculated using a three-year average of 2018-2020 GAP spending levels of \$4,007,179, and the approved 2020 GAP applicable sales forecast from the 2020 rate case in Docket No. G008/GR-19-524. The Company notes that 2020 GAP spending levels were lower than historical results, as the impacts of the COVID-19 pandemic and a suspension of disconnections has reduced customer enrollment in GAP.

Due to the uncertainty as to the number of customers who may seek to participate in GAP following the resumption of disconnection activity, CenterPoint Energy also proposes to remove the overall program spending cap at this time. We will report on the 2021 results in March 2022 and will propose to make any additional adjustments, including adjustments to the annual program budget, as necessary at that time.

Additionally, as discussed in Docket G999/CI-20-375, the Company is proposing to increase both the affordability and arrearage forgiveness benefits under the Program. In particular, the Company proposes to calculate that affordability credit as one-twelfth of the difference between CenterPoint Energy's estimate of the customer's annual gas bill and 2% of the customer's household income. Currently, the affordability credit is based on 4% of the customer's household income. With respect to the arrearage forgiveness credit, CenterPoint Energy proposes to revise this credit to retire participant arrears over 12 months with a customer contributing no more than 1% of their household income. This change is intended to assist customers as the Company transitions back to normal collections and disconnection activities in the coming months. This proposed program change will increase the arrearage and affordability credits as compared to 2020 results and historical levels. These percentage level changes are included in the tariff sheets in Schedule 9, along with the removal of the program spending cap.

Schedule G is a proposed redline draft of our Gas Tariff Page, Section V, Page 25.a.

25 Other Information

As required by the Commission's December 29, 2011 Order in Docket No. G-008/GR-05-1380, CenterPoint Energy's goal is to process 95% of all complete GAP applications within 30 days. All 2020 applications were processed within 30 days of receipt. As required by the Order, the Company's third-party administrator, ECC, makes the GAP application available electronically on its website, www.energycents.org.

On May 31, 2019, the Company submitted its fourth GAP Evaluation report and in its January 17, 2020 Order in Docket No. G-008/M-19-367, the Commission continued the GAP with no expiration date. The Company plans to submit its fifth GAP Evaluation report on or before May 31, 2022.

CenterPoint Energy
GAP Annual Compliance: Summary

Item as listed in in Sept. 24, 2013 Order	2020
1 Average annual affordability benefit received per customer /1/	\$ 316.66
2 Average annual arrearage forgiveness benefit received per customer	\$ 224.11
3 Percentage of Low Income Home Energy Assistance Program (LIHEAP) customers that participated in GAP /2/	32.6%
4 Disconnection rates for:	
(a) GAP customers	0.8%
(b) LIHEAP – Non GAP customers	1.2%
(c) non-LIHEAP customers (all firm customers including C&I) /3/	0.3%
5 Number of GAP participants enrolled as of year-end	8,442
6 Number of GAP participants enrolled and receiving benefits at some time during the year	9,179
7 Annual program budget	\$ 5,000,000
8 Actual program revenue	\$ 664,135
9 Actual program cost /4/	\$ 3,671,321
10 GAP tracker balance as of year-end	\$ (1,897,654)
11 GAP rate-affordability surcharge (\$/therm) /5/	\$ 0.00236

1/ The average annual affordability benefit was calculated by taking the total of the monthly affordability credits for the customers on the program during 2020, dividing by the total number of GAP participants during the year, and then multiplying by 12 months. This was done to match the methodology for reporting the average monthly affordability payment, thereby ensuring that the credit and payment averages were comparable. Since not all GAP participants were in the program for a full 12 months, the Company did not report a simple average of the total program affordability component cost and dividing by the total number of program participants.

2/ Since the LIHEAP calendar year begins in October – three months before the GAP program year begins – some LIHEAP recipients may have participated during the prior GAP year but not the current. Thus, this percentage was calculated as the number of 2020 GAP participants who received LIHEAP from October prior year through September current year, divided by the number of customers who received LIHEAP during that time period.

3/ “All firm customers” in this case includes LIHEAP and non-LIHEAP customers. The Commission’s November 18, 2009 Order, in Ordering Paragraph No. 4(B), instructed utilities to report: “The percentage of GAP customers disconnected compared to the percentage of all firm customers disconnected; in addition, a comparison of the percentage of GAP customers disconnected to the percentage of disconnected LIHEAP customers that do not participate in GAP.”

4/ Total affordability credits + total arrearage credits + incremental administrative cost.

5/ The final rate from Docket No. G-008/GR-19-255 is \$0.00000/therm (effective September 2019). Effective October 1, 2020 a rate of \$0.00236/therm per the Order in G008/M-20-399

CenterPoint Energy
GAP Annual Compliance: Bad Debt Expense

Line	Description	2020		
1	Difference in % Tot pmt req paid		11.9%	
2	Total Payment requested	\$	4,321,369	
3	Diff in Tot pmt req paid	\$	514,136	
4	Incremental LIHEAP - annual report	\$	(541,192)	
5	Total GAP credits	\$	3,270,996	
6	Change in custo payments, LIHEAP, and GAP cr	\$	3,243,940	
7				
8	Change in A/R balance	\$	(3,243,940)	
9	<u>Write-off/Arrears percentage</u>		0.6%	
10	Write-off reduction	\$	(19,464)	
11	Bad Debt Expense reduction, minimum	\$	(19,464)	
12				
13		before GAP	on GAP	Difference
14	Total Payment requested, 2020 GAP Participants	\$	10,047,396	\$ 4,321,369
15				
16	Total Full payment	\$	1,090,968	\$ 614,359
17	Total Partial payment	\$	789,389	\$ 686,439
18	<u>Total on-account payment</u>	\$	47,446	\$ 139,210
19	Total Payments	\$	1,927,803	\$ 1,440,008
20				
21	Tot Pmt/Tot Pmt requested		19.2%	33.3%
22				14.1%
23	Total Payment requested, 2019 GAP Participants	\$	10,047,396	
24	<u>Percent change in average bill from 2019 to 2020</u>		-9%	
25	<u>Change in tot pmt requested due to 2019 to 2020 chgs</u>	\$	(906,683)	15.8%
26	Tot pmt requested, 2020 pro forma	\$	9,140,713	
27	<u>Tot pmt requested, 2020 on GAP actual</u>	\$	4,321,369	
28	Change in tot pmt requested due to GAP	\$	(4,819,344)	84.2%
29	Total change in tot pmt requested, 2019 to 2020	\$	(5,726,027)	100.0%

Line			2020 CPE GAP Report
1	2011 Order Language ¹	3. Utilities shall implement an application processing goal of processing ninety-five percent of all complete gas affordability applications within thirty days of receipt by the utility ...	Section 24
2		6. Each utility shall require its third-party administrator to make GAP applications available electronically on the administrator's websites as a condition of being the third-party administrator for the program.	Section 24
3		7. Each utility shall call or mail reminders to its GAP customers after one missed payment to reduce the number of customers removed from the GAP due to missing two consecutive monthly payments.	Section 1
4		8. Each utility shall cross-promote its GAP with other bill payment and conservation assistance programs.	Section 22
5	2013 Order Language ²	1. The Commission will require the Companies to include a summary schedule that includes the average annual affordability benefit received per customer.	Schedule A
6		2. The Commission will require the Companies to include a summary schedule that includes the average annual arrearage forgiveness benefit received per customer.	Schedule A
7		3. The Commission will require the Companies to include a summary schedule that includes the percentage of Low Income Home Energy Assistance Program (LIHEAP) customers that participated in GAP.	Schedule A
8		4. The Commission will require the Companies to include a summary schedule that includes the disconnection rates for (a) GAP customers, (b) LIHEAP – Non GAP customers, and (c) non-LIHEAP customers (all firm customers including C&I).	Schedule A
9		5. The Commission will require the Companies to include a summary schedule that includes the number of GAP participants enrolled as of year-end.	Schedule A

¹ From Docket G-008/GR-05-1380, December 29, 2011, p.4.

² From Docket G-008/GR-05-1380, September 25, 2013, p.2.

10		6. The Commission will require the Companies to include a summary schedule that includes the number of GAP participants enrolled and receiving benefits at some time during the year.	Schedule A
11		7. The Commission will require the Companies to include a summary schedule that includes the annual program budget.	Schedule A
12		8. The Commission will require the Companies to include a summary schedule that includes the actual program revenue.	Schedule A
13		9. The Commission will require the Companies to include a summary schedule that includes the actual program cost.	Schedule A
14		10. The Commission will require the Companies to include a summary schedule that includes the GAP tracker balance as of year-end.	Schedule A
15		11. The Commission will require the Companies to include a summary schedule that includes the GAP rate-affordability surcharge (\$/therm).	Schedule A
16	2015 Order Language ³	2. Each utility shall include in its next Annual Compliance Report an explanation of why it does not assess the GAP surcharge against Interruptible Sales and Transportation Customers, a proposal evaluating cost allocation methods for its GAP program, and the recalculated surcharge for various alternatives if Interruptible Sales and Transportation Customers were included.	
17	2017 Order Language ⁴	2. CenterPoint and Xcel shall continue to report customer payments, arrears balances and disconnection rates using both the non-GAP LIHEAP baseline method and pre-program baseline method beginning with their 2017 annual reports of the GAP.	<u>Customer Payments:</u> Section 9; <u>Arrears Balances:</u> Section 12; <u>Disconnection Rates:</u> Section 14
18	2018 Order Language ⁵	2. The Commission hereby adopts the streamlined reporting format in Attachment A of the Stakeholder Utility Report.	Schedule D

³ From Docket G-008/M-15-307, September 29, 2015, p. 3. This was a one-time reporting requirement and the information was provided in the Company's annual GAP Compliance filing in Docket No. G-008/M-16-266, Section 23.

⁴ From Docket G-008/M-16-486, May 22, 2017, p. 6. This docket number was the Company's triennial GAP Evaluation report.

⁵ From Docket G-008/M-16-486, September 28, 2018, p. 2. This docket number was the Company's triennial GAP Evaluation report, in which the Utility Stakeholder Report was filed.

19	2020 Order Language ⁶	8a. Provide the costs for each outreach activity associated with increasing LIHEAP and GAP participation and retention	Section 23
20		8b. Report the monthly number of LIHEAP and GAP customers compared to those numbers in the same months for the previous three years	Section 23
21		8c. Provide the average annual and range (low to high) of LIHEAP and GAP customer natural gas usage levels	Section 23
22		8d. report on specific efforts to coordinate participation in LIHEAP, GAP, and CIP programs, including CenterPoint's mapping process to target CIP resources based on natural gas usage and census tract demographic data	Section 22
23		8e. standardize the method for reporting allowable, incremental and total GAP administrative costs, using the March 31, 2020 report in Docket No. 20-399 as the format, and continue to provide the percentage of program costs represented by administrative costs.	Section 4

⁶ From Docket G-008/M-20-399, November 5, 2020, p. 5. This docket number was the Company's annual GAP Compliance report.

2020	
Program dates and status	
Date program started	5/1/2007
Program effective date	1/1/2017
Date next evaluation report due	5/31/2022
Date last evaluation completed	5/31/2019
Last evaluation docket number	G-008/M-19-367
Status of program (pilot or permanent)	Permanent
Date pilot program ends, if applicable	N/A
Date of last Evaluation Order	1/17/2020
Program administrator	Energy CENTS Coalition
Participant benefits	
Description of affordability benefit - maximum payment as % of household income	4%
Description of arrearage forgiveness benefit - repayment period	12 months
Average annual income per participant	\$13,303
Average annual bill per participant	\$838
	\$377
Average annual affordability benefit per participant	\$317
Average annual arrearage forgiveness benefit per customer	\$224
Average total benefit per participant	\$541
Cost and Cost Recovery	
Annual budget	\$5,000,000
Actual revenue	\$664,135
Annual cost	\$3,454,632
Surcharge (\$/therm)	0.00000 Jan - Sep / 0.00236 Oct - Dec
Annual cost of surcharge for average residential customer who uses 900 therms of gas per year	\$0.55
Customer classes assessed the GAP surcharge	Firm Customers (Residential, Commercial A, Commercial/Industrial - B, Commercial/Industrial - C, and Large General Service)
Tracker balance as of year-end	(\$1,897,654)
Participation	
% of LIHEAP customers that participated in GAP	41%
Number of participants enrolled as of year-end	8,547
Number of participants enrolled and receiving benefits at some time during the year	9,179
Whether a waiting list occurred at any time during the year	No
If so, the number of customers on the waiting list and for how long	N/A

Impact on disconnection rates	
Disconnection rates - non-GAP LIHEAP baseline	
GAP participants	0.8%
Non-GAP LIHEAP customers	1.2%
Non-LIHEAP residential customers	0.3%
Disconnection rates - pre-program baseline	
GAP participant cohort	Year 2020 GAP Participants <i>prior to</i> enrolling in GAP during Year 2020.
GAP participants cohort before they were enrolled in GAP	0.0%
Impact on payment frequency	
Dollars paid ÷ dollars requested	
Non-GAP LIHEAP Baseline	
GAP participants	33%
Non-GAP LIHEAP customers	36%
Non-LIHEAP residential customers	89%
Pre-Program Baseline	
GAP participant cohort	2020 GAP Participants: 12 Months Prior
GAP participant cohort before they were enrolled in GAP	19%
Number of payments made paid ÷ number of payments requested	
Non-GAP LIHEAP baseline	
GAP participants	60%
Non-GAP LIHEAP customers	50%
Non-LIHEAP residential customers	91%
Pre-program baseline	
GAP participant cohort	2020 GAP Participants: 12 Months Prior
GAP participant cohort before they were enrolled in GAP	49%
Impact on arrears	
% Customers in arrears	
Non-GAP LIHEAP baseline	
GAP participants	35%
Non-GAP LIHEAP customers	28%
Non-LIHEAP residential customers	10%
Pre-Program baseline	
GAP participant cohort	Active GAP participants (with arrears) at January 2020, who remained an active GAP Participant in January 2020 through December 2020.
GAP participant cohort before they were enrolled in GAP	445 (customer count that meets the criteria above)

Dollar amount of arrears	
% Change in dollar amount of arrears (non-GAP LIHEAP baseline)	
GAP participants	-7%
Non-GAP LIHEAP customers	46%
Non-LIHEAP residential customers	46%
Dollar amount of arrears (pre-Program baseline)	
GAP participant cohort	Active GAP participants (with arrears) at January 2020, who remained an active GAP Participant in January 2020 through December 2020.
GAP participant cohort before they were enrolled in GAP	20%
Complaints	
Number of complaints	1
Nature of complaint(s)	Account balances and general GAP information (Section 18 of annual filing).
Retention	
GAP participant retention rate	73%
Impact on collection activity	
Brief description of effect of GAP on collection activity	The 2020 Report includes information on areas of collection activity including an improvement in the payment frequency compared to pre-GAP payment behavior (Section 9), and a greater percentage reduction in arrears compared to LIHEAP non-GAP customers (Section 12). These facts support the conclusion that GAP reduced collection activity for the Company.
Coordination with other programs	
Page(s) of report where coordination efforts described	Pages 18 - 20 (Section 22 of annual filing).

CenterPoint Energy Minnesota Gas
 GAP Tracker and Balance
 2021 Actuals & 2021 Forecast
 Current Approved GAP of \$0.0236
 Proposed Rate as of Oct. 1 for GAP of \$0.0264 (per Dt)

	Jan 21 Actual	Feb 21 Actual*	Mar 21 Forecast	Apr 21 Forecast	May 21 Forecast	June 21 Forecast	July 21 Forecast	Aug 21 Forecast	Sept 21 Forecast	Oct 21 Forecast	Nov 21 Forecast	Dec 21 Forecast	
Expenses													
1	Beginning Tracker Balance (\$) - Under / (Over) Recovered	(1,897,654)	(2,203,714)	(2,646,264)	(2,754,334)	(2,764,390)	(2,609,180)	(2,080,343)	(1,777,026)	(1,438,860)	(1,129,417)	(897,590)	(760,061)
2	GAP Program Expenditures - Arrears & Afford Credits; Admin Costs	139,992	54,616	325,334	268,387	330,128	630,915	350,085	372,017	370,750	378,539	371,756	414,660
3	Tracker Balance After Expenses (Line 1 + Line 2)	(1,757,662)	(2,149,098)	(2,320,930)	(2,485,947)	(2,434,262)	(1,978,265)	(1,730,258)	(1,405,009)	(1,068,110)	(750,879)	(525,834)	(345,401)
Recovery													
4	Total Volumes (Dt)	18,900,522	21,066,377	18,364,565	11,798,435	7,411,760	4,325,338	1,981,701	1,434,364	2,597,742	5,557,224	8,872,231	15,651,538
5	Base Rate Recovery (GAP) (per Dt)	0.0236	0.0236	0.0236	0.0236	0.0236	0.0236	0.0236	0.0236	0.0236	0.0264	0.0264	0.0264
6	Base Rate Cost Recovery (\$) (Line 4 * Line 5)	(446,052)	(497,166)	(433,404)	(278,443)	(174,918)	(102,078)	(46,768)	(33,851)	(61,307)	(146,711)	(234,227)	(413,201)
7	Interim Rate	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
8	Interim Rate Recovery (Line 4 * Line 7)	-	-	-	-	-	-	-	-	-	-	-	-
9	Total Recovery (Line 6 + Line 8)	(446,052)	(497,166)	(433,404)	(278,443)	(174,918)	(102,078)	(46,768)	(33,851)	(61,307)	(146,711)	(234,227)	(413,201)
10	Ending Tracker Balance - Under / (Over) Recovered (Line 3 + Line 9)	(2,203,714)	(2,646,264)	(2,754,334)	(2,764,390)	(2,609,180)	(2,080,343)	(1,777,026)	(1,438,860)	(1,129,417)	(897,590)	(760,061)	(758,602)

*Arreage and forgiveness credits were not properly booked in Feb. 2021 actuals. The adjustment will be made when March books are closed in April

CenterPoint Energy Minnesota Gas
 GAP Tracker and Balance
 2022 Forecast
 Proposed Rate for GAP of \$0.0264 (per Dt)

	Jan 22 Forecast	Feb 22 Forecast	Mar 22 Forecast	Apr 22 Forecast	May 22 Forecast	June 22 Forecast	July 22 Forecast	Aug 22 Forecast	Sept 22 Forecast	Oct 22 Forecast	Nov 22 Forecast	Dec 22 Forecast	
Expenses													
1	Beginning Tracker Balance (\$) - Under / (Over) Recovered	(758,602)	(1,240,634)	(1,637,663)	(1,806,323)	(1,856,979)	(1,731,824)	(1,232,878)	(944,976)	(621,311)	(329,589)	(108,429)	18,623
2	GAP Program Expenditures - Arrears & Afford Credits; Admin Costs	129,895	172,158	316,165	260,824	320,825	613,134	340,219	361,533	360,301	367,871	361,279	402,974
3	Tracker Balance After Expenses (Line 1 + Line 2)	(628,707)	(1,068,475)	(1,321,498)	(1,545,500)	(1,536,154)	(1,118,689)	(892,659)	(583,444)	(261,009)	38,282	252,850	421,597
Recovery													
4	Total Volumes (Dt)	23,179,067	21,560,166	18,364,565	11,798,435	7,411,760	4,325,338	1,981,701	1,434,364	2,597,742	5,557,224	8,872,231	15,651,538
5	Base Rate Recovery (GAP) (per Dt)	0.0264	0.0264	0.0264	0.0264	0.0264	0.0264	0.0264	0.0264	0.0264	0.0264	0.0264	0.0264
6	Base Rate Cost Recovery (\$) (Line 4 * Line 5)	(611,927)	(569,188)	(484,825)	(311,479)	(195,670)	(114,189)	(52,317)	(37,867)	(68,580)	(146,711)	(234,227)	(413,201)
7	Interim Rate	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
8	Interim Rate Recovery (Line 4 * Line 7)	-	-	-	-	-	-	-	-	-	-	-	-
9	Total Recovery (Line 6 + Line 8)	(611,927)	(569,188)	(484,825)	(311,479)	(195,670)	(114,189)	(52,317)	(37,867)	(68,580)	(146,711)	(234,227)	(413,201)
15	Ending Tracker Balance - Under / (Over) Recovered (Line 3 + Line 9)	(1,240,634)	(1,637,663)	(1,806,323)	(1,856,979)	(1,731,824)	(1,232,878)	(944,976)	(621,311)	(329,589)	(108,429)	18,623	8,396

Docket No. G-008/M-21-____

March 31, 2021

Schedule G:

Revised Draft Tariff Page

Section V, Page 25.a

REDLINE

GAS AFFORDABILITY SERVICE PROGRAM (“PROGRAM”)

1) Availability:

Available to residential customers who have been qualified and receive assistance from the Low Income Home Energy Assistance Program (“LIHEAP”) during the federal fiscal year (“Program Year”). Further, such customers must agree to be placed on a levelized payment plan and must also agree to a payment schedule as described below to be considered a “Qualified Customer”. Only customers receiving a financial benefit under paragraph 2.1 and/or 2.2 shall be considered a “Qualified Customer.”

2) Program Description and Rate Impact for Qualifying Customers:

This Program shall meet the conditions of Minnesota Statutes, Chapter 216B.16, Subd. 15 on low income programs. The Program has two components: 1) Affordability, and 2) Arrearage Forgiveness. CenterPoint Energy, or an agent of CenterPoint Energy, will review current billing and consumption information, approved LIHEAP benefits and household income information as submitted to CenterPoint Energy to determine a Qualified Customer’s payment schedule amount. A Qualified Customer’s payment schedule shall include both payment of the customer’s current month’s bill (which reflects one-twelfth the levelized payment plan), after inclusion of the affordability bill credit, and payment of a portion of the Qualified Customer’s pre-program arrears.

2.1) Affordability Component:

The Affordability component consists of a bill credit determined as one-twelfth of the difference between CenterPoint Energy’s estimate of the Qualified Customer’s annual gas bill and 24% of the Qualified Customer’s household income as provided by the Qualified Customer to CenterPoint Energy. This bill credit is a Program cost that will be included in the Tracker. Any energy assistance sums not applied to arrears will be applied to a Qualified Customer’s current bill. Energy Assistance is not considered in the calculation of the affordability credit.

2.2) Arrearage Forgiveness Component:

The Arrearage Forgiveness component consists of a monthly credit that will be applied each month before receipt of the Qualified Customer’s payment. The credit will be designed to retire pre-program arrears over a period of 12 months and calculated so that the amount the Qualified Customer contributes to retire pre-program arrears is 12% or less of the Qualified Customer’s household income as provided by the Qualified Customer to CenterPoint Energy. This arrearage forgiveness credit is a Program cost that will be included in the Tracker.

3) Conditions of Service:

- 3.1) Enrollment participation is limited to a first come first served basis until the estimated Program dollar cap is reached.
- 3.2) Before the start of an enrollment period, CenterPoint Energy will mail information on the Program and an application to participate in the Program to targeted current LIHEAP customers in arrears. The application for participation must be completed in full and returned to CenterPoint Energy before the close of the enrollment period.
- 3.3) Regardless of arrears balances, CenterPoint Energy agrees to maintain service and suspend collection activities to Qualified Customers if they maintain their payment schedule.
- 3.4) Qualified Customers must maintain an active CenterPoint Energy account in said customer’s name at their permanent primary residence only to be eligible for this Program.
- 3.5) Qualified Customers agree to notify CenterPoint Energy of any changes in address, income level, or household size. Such changes may result in removal from the Program. Additionally, Qualified Customers who do not continue to qualify under the provisions of Section 1 above can be removed from the Program.

GAS AFFORDABILITY SERVICE PROGRAM (“PROGRAM”) (CONTINUED)

3.6) If a Qualified Customer fails to pay two consecutive monthly payments in full under the Program, they will be terminated from the Program and will be subject to CenterPoint Energy’s regular collection practices including the possibility of disconnection.

4) Funding:

4.1) ~~Total Program costs, which include start-up costs, Affordability component, Arrearage Forgiveness component and incremental administration costs incurred by CenterPoint Energy shall not exceed \$5 million per year. However, if~~ there is an over-recovered balance in the Tracker at the end of a year, the over-recovered balance may be rolled over to the subsequent year and can be used to supplement benefits in the subsequent year unless the Minnesota Public Utilities Commission orders otherwise. CenterPoint Energy shall limit administrative costs included in the tracker (except start-up related costs) to 5% of total Program costs. Administrative costs will include, but are not limited to, the costs to inform customers of the Program and costs to process and implement enrollments.

4.2) CenterPoint Energy shall recover Program costs in the Delivery Charge applicable to all customers receiving firm service under the following tariffs: Residential Sales Service, Small Volume Commercial & Industrial Sales Service, Small Volume Firm Transportation Service, Large General Firm Sales and Large Volume Firm Transportation, except customers taking service under the Market Rate Service Rider.

4.3) A tracking mechanism (“Tracker”) will be established to provide for recovery of actual Program costs as compared to the recovery of Program costs through rates. CenterPoint Energy will track and defer Program costs with regulatory approval. The prudence of the Program costs are subject to regulatory review. The GAP recovery rate is \$0.0026436 per therm. CenterPoint Energy may petition the Commission to adjust this rate in order to true up the Program balance in the Tracker.

5) Evaluation:

5.1) The Program shall be evaluated on or before May 31, 2022. The program may be modified based on annual reports and on a financial evaluation.

5.2) The annual reports will include the effect of the Program on customer payment frequency, payment amount, arrearage level and number of customers in arrears, service disconnections, retention rates, customer complaints and utility customer collection activity. The annual reports may also include information about customer satisfaction with the Program.

5.3) The financial evaluation will include a discounted cash flow of the Program’s cost-effectiveness analysis from a ratepayer perspective comparing the 1) total Program costs, which includes the Affordability component, Arrearage Forgiveness component and total company incurred administration costs, to 2) the total net savings including cost reductions on utility functions such as the impact of the Program on write-offs, service disconnections and reconnections and collections activities. The discounted cash flow difference between total Program costs and total net savings will result in either a net benefit or a net cost to ratepayers for the Program.

6) Program Revocation:

The Program, upon approval by the Commission, is effective unless the Commission, after notice and hearing, rescinds or amends its order approving the Program.

GAS AFFORDABILITY SERVICE PROGRAM (“PROGRAM”)

1) Availability:

Available to residential customers who have been qualified and receive assistance from the Low Income Home Energy Assistance Program (“LIHEAP”) during the federal fiscal year (“Program Year”). Further, such customers must agree to be placed on a levelized payment plan and must also agree to a payment schedule as described below to be considered a “Qualified Customer”. Only customers receiving a financial benefit under paragraph 2.1 and/or 2.2 shall be considered a “Qualified Customer.”

2) Program Description and Rate Impact for Qualifying Customers:

This Program shall meet the conditions of Minnesota Statutes, Chapter 216B.16, Subd. 15 on low income programs. The Program has two components: 1) Affordability, and 2) Arrearage Forgiveness. CenterPoint Energy, or an agent of CenterPoint Energy, will review current billing and consumption information, approved LIHEAP benefits and household income information as submitted to CenterPoint Energy to determine a Qualified Customer’s payment schedule amount. A Qualified Customer’s payment schedule shall include both payment of the customer’s current month’s bill (which reflects one-twelfth the levelized payment plan), after inclusion of the affordability bill credit, and payment of a portion of the Qualified Customer’s pre-program arrears.

2.1) Affordability Component:

The Affordability component consists of a bill credit determined as one-twelfth of the difference between CenterPoint Energy’s estimate of the Qualified Customer’s annual gas bill and 2% of the Qualified Customer’s household income as provided by the Qualified Customer to CenterPoint Energy. This bill credit is a Program cost that will be included in the Tracker. Any energy assistance sums not applied to arrears will be applied to a Qualified Customer’s current bill. Energy Assistance is not considered in the calculation of the affordability credit.

2.2) Arrearage Forgiveness Component:

The Arrearage Forgiveness component consists of a monthly credit that will be applied each month before receipt of the Qualified Customer’s payment. The credit will be designed to retire pre-program arrears over a period of 12 months and calculated so that the amount the Qualified Customer contributes to retire pre-program arrears is 1% or less of the Qualified Customer’s household income as provided by the Qualified Customer to CenterPoint Energy. This arrearage forgiveness credit is a Program cost that will be included in the Tracker.

3) Conditions of Service:

- 3.1) Enrollment participation is limited to a first come first served basis until the estimated Program dollar cap is reached.
- 3.2) Before the start of an enrollment period, CenterPoint Energy will mail information on the Program and an application to participate in the Program to targeted current LIHEAP customers in arrears. The application for participation must be completed in full and returned to CenterPoint Energy before the close of the enrollment period.
- 3.3) Regardless of arrears balances, CenterPoint Energy agrees to maintain service and suspend collection activities to Qualified Customers if they maintain their payment schedule.
- 3.4) Qualified Customers must maintain an active CenterPoint Energy account in said customer’s name at their permanent primary residence only to be eligible for this Program.
- 3.5) Qualified Customers agree to notify CenterPoint Energy of any changes in address, income level, or household size. Such changes may result in removal from the Program. Additionally, Qualified Customers who do not continue to qualify under the provisions of Section 1 above can be removed from the Program.

GAS AFFORDABILITY SERVICE PROGRAM (“PROGRAM”) (CONTINUED)

3.6) If a Qualified Customer fails to pay two consecutive monthly payments in full under the Program, they will be terminated from the Program and will be subject to CenterPoint Energy’s regular collection practices including the possibility of disconnection.

4) Funding:

4.1) If there is an over-recovered balance in the Tracker at the end of a year, the over-recovered balance may be rolled over to the subsequent year and can be used to supplement benefits in the subsequent year unless the Minnesota Public Utilities Commission orders otherwise. CenterPoint Energy shall limit administrative costs included in the tracker (except start-up related costs) to 5% of total Program costs. Administrative costs will include, but are not limited to, the costs to inform customers of the Program and costs to process and implement enrollments.

4.2) CenterPoint Energy shall recover Program costs in the Delivery Charge applicable to all customers receiving firm service under the following tariffs: Residential Sales Service, Small Volume Commercial & Industrial Sales Service, Small Volume Firm Transportation Service, Large General Firm Sales and Large Volume Firm Transportation, except customers taking service under the Market Rate Service Rider.

4.3) A tracking mechanism (“Tracker”) will be established to provide for recovery of actual Program costs as compared to the recovery of Program costs through rates. CenterPoint Energy will track and defer Program costs with regulatory approval. The prudence of the Program costs are subject to regulatory review. The GAP recovery rate is \$0.00264 per therm. CenterPoint Energy may petition the Commission to adjust this rate in order to true up the Program balance in the Tracker.

5) Evaluation:

5.1) The Program shall be evaluated on or before May 31, 2022. The program may be modified based on annual reports and on a financial evaluation.

5.2) The annual reports will include the effect of the Program on customer payment frequency, payment amount, arrearage level and number of customers in arrears, service disconnections, retention rates, customer complaints and utility customer collection activity. The annual reports may also include information about customer satisfaction with the Program.

5.3) The financial evaluation will include a discounted cash flow of the Program’s cost-effectiveness analysis from a ratepayer perspective comparing the 1) total Program costs, which includes the Affordability component, Arrearage Forgiveness component and total company incurred administration costs, to 2) the total net savings including cost reductions on utility functions such as the impact of the Program on write-offs, service disconnections and reconnections and collections activities. The discounted cash flow difference between total Program costs and total net savings will result in either a net benefit or a net cost to ratepayers for the Program.

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CERTIFICATE OF SERVICE

Docket No. G-008/M-21-_____

Wakila Johnson, on behalf of CenterPoint Energy, certifies she served the attached Franchise Fee Filing by CenterPoint Energy on all parties on the attached service list from Docket No. G-008/M-21-_____

/s/

Wakila Johnson

Regulatory Analyst Assistant

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_CenterPoint Energy Minnesota Gas_GEN_SL_CenterPoint Energy Minnesota Gas_General Service List 2019
Brenda A.	Bjorklund	brenda.bjorklund@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	GEN_SL_CenterPoint Energy Minnesota Gas_GEN_SL_CenterPoint Energy Minnesota Gas_General Service List 2019
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	No	GEN_SL_CenterPoint Energy Minnesota Gas_GEN_SL_CenterPoint Energy Minnesota Gas_General Service List 2019
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	GEN_SL_CenterPoint Energy Minnesota Gas_GEN_SL_CenterPoint Energy Minnesota Gas_General Service List 2019
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	GEN_SL_CenterPoint Energy Minnesota Gas_GEN_SL_CenterPoint Energy Minnesota Gas_General Service List 2019
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	GEN_SL_CenterPoint Energy Minnesota Gas_GEN_SL_CenterPoint Energy Minnesota Gas_General Service List 2019
Robert	Harding	robert.harding@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	No	GEN_SL_CenterPoint Energy Minnesota Gas_GEN_SL_CenterPoint Energy Minnesota Gas_General Service List 2019
Amber	Lee	Amber.Lee@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	GEN_SL_CenterPoint Energy Minnesota Gas_GEN_SL_CenterPoint Energy Minnesota Gas_General Service List 2019
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	GEN_SL_CenterPoint Energy Minnesota Gas_GEN_SL_CenterPoint Energy Minnesota Gas_General Service List 2019

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	GEN_SL_CenterPoint Energy Minnesota Gas_GEN_SL_CenterPoint Energy Minnesota Gas_General Service List 2019
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_CenterPoint Energy Minnesota Gas_GEN_SL_CenterPoint Energy Minnesota Gas_General Service List 2019
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	GEN_SL_CenterPoint Energy Minnesota Gas_GEN_SL_CenterPoint Energy Minnesota Gas_General Service List 2019
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	No	GEN_SL_CenterPoint Energy Minnesota Gas_GEN_SL_CenterPoint Energy Minnesota Gas_General Service List 2019
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_CenterPoint Energy Minnesota Gas_GEN_SL_CenterPoint Energy Minnesota Gas_General Service List 2019
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	No	GEN_SL_CenterPoint Energy Minnesota Gas_GEN_SL_CenterPoint Energy Minnesota Gas_General Service List 2019
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	GEN_SL_CenterPoint Energy Minnesota Gas_GEN_SL_CenterPoint Energy Minnesota Gas_General Service List 2019
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	GEN_SL_CenterPoint Energy Minnesota Gas_GEN_SL_CenterPoint Energy Minnesota Gas_General Service List 2019

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_CenterPoint Energy Minnesota Gas_GEN_SL_CenterPoint Energy Minnesota Gas_General Service List 2019
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 Minnesota Gas_GEN_SL_CenterPoint Energy Minnesota Gas_General Service List 2019