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July 30, 2020

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

PUBLIC DOCUMENT
Trade Secret Data has been Excised

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

Compliance Filing – COVID Cost Estimates

Dear Mr. Seuffert:

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas (“CenterPoint Energy” or “Company”), respectfully submits this compliance filing to the Minnesota Public Utilities Commission (“Commission”) pursuant to the Commissions May 22, 2020 Order in this docket which was further clarified on June 25, 2020 by the Executive Secretary via letter.

CenterPoint Energy has designated information in the attachment to this filing as TRADE SECRET. The information in the attachment meets the definition of trade secret information in Minn. Stat. § 13.37, subd. 1(b) as follows:

- 1) The information was supplied by CenterPoint Energy, the affected organization.
- 2) CenterPoint Energy has taken all reasonable efforts to maintain the secrecy of the information, including protecting it from disclosure in this proceeding.
- 3) The protected information contains second quarter financial information which will not be generally released to the public until the Company’s second quarter earnings call. This information derives independent economic value from not being generally known to, and not readily ascertainable by proper means, by other persons who can obtain economic value from its disclosure or use.

The Company will file a non-trade secret version of the attachment following its second quarter earnings call.

In the June 25, 2020 clarification letter, the Company was ordered to file the following;

1. For the duration of this proceeding, quarterly compliance filings for the quarters ending in March, June, September, and December will be due 30 days after the end of each respective quarter.
2. The first quarterly report will be due on or before July 30, 2020.
3. Compliance filings will include estimates of any COVID-related costs or offsets that are known at that time.
4. All quarterly reports must include an accounts receivable aging, by class, using a format similar to the one below:

Class	Current	1-30 days past due	31-60 days past due	61-90 days past due	90+ days past due	Total
Residential						
Commercial						
Industrial						
Total						

Items 1, 2, and 3 are addressed in Attachment A which includes the current estimate COVID related costs and offsets for the quarter ended June 2020. As of this filing, information for Overtime, Sales, Customers, or Late Payment Revenues have not been identified, and therefore no impact on the Regulatory Asset/Liability has been recorded.

Item 4 for June 2020 information is addressed in the table below.

Class	1-30 days past due	31-60 days past due	61-90 days past due	90+ days past due	Total
Residential	\$4,127,892	\$2,656,770	\$3,645,761	\$6,549,149	\$16,979,571
FIRM (Com/Ind)	\$2,197,649	\$904,051	\$927,924	\$1,190,427	\$5,220,050
Dual Fuel (Com/Ind)	\$140,077	\$74,644	\$43,750	\$102,028	\$360,498
Total	\$6,465,618	\$3,635,465	\$4,617,435	\$7,841,604	\$22,560,122

Please feel free to contact me at 612-321-4625 or amber.lee@centerpointenergy.com with any questions.

Sincerely,

/s/ Amber Lee

Amber Lee
Director, Regulatory Affairs

C: Service List

REGULATORY ASSET TRACKER - COVID-19

Attachment_A

Category	Initiative	Item	Category*	Short Description	Basis	Internal Order	2020 Actual	2020 Estimate (3)	Reg Asset/(Liability)
COLUMN IS TRADE SECRET									
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	11042366			
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	11042366 11042305 11042368			
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.	11042366 11042305 11042368 S/156200/EX/ENTD131			
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	(1) (2)			
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	(1) (2)			
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	(1)			

TOTAL IS TRADE SECRET
 Total

*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.

(1) Not currently tracked by cost object at June 30, 2020
 (2) At the closing of June 2020 books cost savings had not been booked, but based on review CenterPoint Energy anticipates making a savings entry in the Regulatory Asset.
 (3) The estimate column represents amounts included in the current rate case, Docket No. G008/GR-19-524, for the months March - June.

CERTIFICATE OF SERVICE

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

/s/ _____
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Regulatory Analyst
CenterPoint Energy

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