



505 Nicollet Mall  
P.O. Box 59038  
Minneapolis, MN 55459-0038

June 11, 2025

**VIA eFILING**

Mr. Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101-2116

**Re: In the Matter of Recent Utility Cold Weather Rule Reports**

**Docket No. E,G-999/PR-25-2**

**SUPPLEMENTAL COMMENTS**

Dear Mr. Seuffert:

CenterPoint Energy Resources Corp d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or the "Company") hereby submits to the Minnesota Public Utilities Commission (the "Commission") our Supplemental Comments in response to the Minnesota Department of Commerce's (the "Department") May 14, 2025 comments in relation to the February 28, 2025 Notice of Comment Period on Cold Weather Rule Reports for Regulated Gas and Electric Companies in the above referenced docket. In the May 14 Department Comments, utilities were asked to provide supplemental comments responding to items C.4 and C.6.

The Company appreciates the Department's comments analysis of the disconnection data. CenterPoint Energy's engagement in this docket is in conjunction with docket G-008/C-24-191, including details on its disconnection processes.

C.4 How do utilities currently communicate information on disconnection and payment arrangement policies to non-English speakers, especially to people that do not read their native language?

The Company provides interpreter/language translation services for all customers during any phone interactions. Customers can choose English, Spanish, Somali, and Hmong translations on the Company website. Additionally, the disconnection notice is printed in the noted 4 languages. Field personnel utilize multiple techniques to gain customer understanding during visits to the customer's home.

C.6 Are utilities heat-affected customers, particularly for customers with electricity service necessary to operate gas heating equipment, being provided with appropriate protections during CWR season (October 1 – April 30), including site visits before any disconnections for non-payment? How are utilities ensuring that its records of heat-affected customers are accurate?

CenterPoint Energy has identification on the accounts of customers to identify if they are heat-affected. The Company provides all customers with their rights under the Cold Weather Rule through

Mr. Will Seuffert  
June 11, 2025  
Page 2 of 2

an annual bill insert at the start of each Cold Weather Rule. There are scripted processes identified in Attachment A of this filing. In addition to the scripted processes, the Company does visits to the home and provides Cold Weather Rule information to the customer, after the home visit an attempt to contact the customer after hours to the phone number on record of the customer between 4:30 and 8:00 pm. If unable to contact the customer via phone, an additional field visit is made to the home.

If you have questions, please contact me at [sherry.kemmetmueller@centerpointenergy.com](mailto:sherry.kemmetmueller@centerpointenergy.com) or 612-321-5191.

Sincerely,

*/s/ Sherry Kemmetmueller*

Manager, Regulatory Affairs

Attachment A

C: Service List

**CenterPoint Energy disconnection, payment agreement and billing process****Disconnection Process:**

Service disconnection is a last resort; Center Point Energy works with our customers who are unable to pay their full balance or full disconnect balance to gain an agreement of a payment arrangement that works for them. We also refer customers to various forms of energy assistance.

**Disconnection Notice.** The disconnection/shut-off notice precedes any action by 10 days during non-Cold Weather Rule periods (May 1<sup>st</sup> – Sep 30<sup>th</sup>), 15 days during Cold Weather Rule (Oct 1<sup>st</sup> – Apr 30<sup>th</sup>). All notices are sent to the address where the service is provided and to the address where the bill is sent, if it is different from the service address.

**Payment thresholds.** Disconnect notices will only be mailed out once a customer's past due balance reaches \$75 and is 60 days delinquent. Customers are not subject to disconnection until the past due balance reaches at least \$175.

**Communication channels.** For customers who have provided an active phone number, the company will place a friendly reminder phone call 1 day after the customers' due date if they fall past due. If the customer has agreed to receive "Bill Reminder alerts", they will also receive either a text message or email alert or both, depending on what the customer has requested and contact method they have given us permission to use. For customers enrolled in "Bill reminder," alerts, the alert is sent 2 days before the due date and 5 days after the account is past due.

**Payment Agreement:**

CenterPoint Energy shall offer payment agreements to residential customers for the payment of arrears. Payment agreements consider the customer's financial circumstances and any extenuating circumstances of the household.

Payment "Extensions" allow additional time to pay the past due in full by a specific date, while payment "Installment" plans allow customers to pay past due charges over time along with paying their new charges each month (actual usage or budget).

Payment arrangement should be offered when the customer has a past due balance. During CWR period, payment arrangements can also be offered for customers anticipating a need (with or without a past due balance).

**Specific Payment Agreements offered**

Fixed Plus Current, Fixed Plus Budget (Fixed is \$55 or \$80) up to 12 months

Average Monthly Billing Plus Deferred (Budget + Delinquency): Balance divided by 12 + Budget (pays off the balance in 12 months)

**Minnesota Cold Weather Rule**

Minnesota has Cold Weather Rule protection for residential heating customers who are experiencing difficulty in paying their natural gas bill. The protection period runs from October 1st –

April 30<sup>th</sup> Although it does not completely stop winter disconnection, it does add a layer of protection for these customers

During Cold Weather Rule CNP has a scripting process in place to determine payment plan eligibility. This applies to both “Active and “Disconnected” customers.

#### Active Customer Payment Plans – Scripting

Customers who contact us regarding their past due balance will engage with agent who ask them a series of questions regarding their financial situation. If through this discussion they are deemed Income eligible (low income based on LIHEAP program requirements, their monthly payment plan is capped at 10% of their monthly income. If they are not income eligible, we will ask a series of questions to determine a payment plan that meets their needs.

#### Disconnected Customer Payment Plans – Scripting

Customers who contact us to have their service restored and have a past due balance will engage with an agent who will ask them a series of questions to determine a reconnection payment plan that meets their needs. If they are deemed income eligible, their monthly payment plan is capped at 10% of their bill and they are not required to make a down payment to have their service restored. If they are not income eligible, they will also be asked a series of questions to determine a payment plan that meets their needs and may be required to make a down payment prior to the service being restored.

#### Medical Emergency Provision

All customers that have a medical need for natural gas have the ability file a medical provision that protects their service from disconnection. To be protected by this provision the customer needs to have a medical professional complete and sign a medical certificate and agree to a monthly payment / repayment plan.

#### Customer Appeal provision during CWR

All customers who cannot reach a payment plan agreement with CNP during CWR are eligible to file an appeal with the Minnesota Public Utilities Commission. Once filed the MN Commission will determine if the customer appeal is accepted and once accepted, they will also determine an acceptable repayment plan.

#### End of CWR 4/30

Unless otherwise noted all CWR payment plans will end 4/30, customers are eligible to establish a new payment plan after that date.

#### **Billing Process:**

##### **Explanation of the billing cycle**

Meter Reading is the start of billing cycle and measures the amount gas used since the last meter reading. The customer is billed for the gas used during that billing cycle (approximately one month).

Bill Date is the date the bill is generated and sent to customer (either printed and mailed or as a link to a PDF version of the same document in email for customers who choose paperless billing). It is not the same date each month due to variations like the number of days in the month or the scheduled reading date falling on a weekend or holiday. The bill is typically generated a day or two after the meter reading date.

Due Date is 28 days from bill mailing date and is not the same date each month.

**Making a payment**

Customers may mail their payment using the return envelope enclosed with their bill.

Customers can pay online or through the automated phone system using:

- Checking account
- Savings account
- Credit card (with a fee)
- Debit card (with a fee)

Customers can pay at an authorized payment center.

**Late Payments**

Delinquent amounts are subject to a late payment charge of 1.5% (18% annually) or \$1.00, whichever is greater. No late payment charge will be applied if the delinquent amount is \$10.00 or less.

**Returned Payments**

A \$10.00 charge will be assessed whenever CenterPoint Energy is notified by a financial institution that a check, draft, or negotiable instrument drawn by the customer has been dishonored.

**Optional Billing Services**

Average Monthly Billing is a twelve (12) month payment plan which allows eligible customers to pay for natural gas service in approximately equal monthly payments. Every six months the monthly payment will be reviewed and adjusted, if necessary, to reflect variances in actual versus estimated usage, and differences in actual versus forecasted billing rates. If an adjustment is necessary, the customer has the option to pay the new monthly amount or drop from the plan. An Average Monthly Billing customer with a past due balance including two (2) or more Average Monthly Billing payments is in default on the Average Monthly Billing agreement and may be removed from Average Monthly Billing. The balances previously deferred under Average Monthly Billing will become immediately due and payable.

AutoPay allows a customer to have their monthly payment automatically drafted from their checking or savings account each month.

Paperless Billing allows a customer to receive their monthly invoice electronically, rather than printed on paper and mailed to them.

Payment Alerts allow a customer to receive an email and/or text to notify them that a payment is due.

My Account allows customers to manage their account and preferences online, including setting communication preferences, view and pay bills, manage alerts and enroll in optional services like AutoPay or Average Monthly billing.

## **CERTIFICATE OF SERVICE**

I, Christina Benning, certify that on Wednesday, June 11, 2025, I served the attached Supplemental Comments of CenterPoint Energy on the attached service list for Docket No. E,G-999/PR-25-2. The filing was delivered electronically or, if indicated on the attached service list, placed in the U.S. Mail at Minneapolis, Minnesota.

/s/ Christina Benning

Senior Regulatory Paralegal  
CenterPoint Energy

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	PR-25-2
2	Ryan	Baumtrog	ryan.baumtrog@state.mn.us		Minnesota Dept of Housing	400 Wabasha St N Ste 400 St. Paul MN, 55102 United States	Electronic Service		No	PR-25-2
3	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	PR-25-2
4	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	PR-25-2
5	Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 St. Paul MN, 55101 United States	Electronic Service		No	PR-25-2
6	Beverly	Dahlberg	bevdahlberg@nweco.com	Northwestern Wisconsin Electric Co.		104 South Pine Street P O Box 9 Grantsburg WI, 54840-0009 United States	Electronic Service		No	PR-25-2
7	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	PR-25-2
8	Ron	Elwood	relwood@mnlisap.org	Legal Services Advocacy Project		970 Raymond Avenue Suite G-40 Saint Paul MN, 55114 United States	Electronic Service		No	PR-25-2
9	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	PR-25-2
10	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	PR-25-2
11	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	PR-25-2
12	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	PR-25-2
13	Jack	Kegel	jkegel@mmua.org	MMUA		3025 Harbor Lane N Suite 400 Plymouth MN, 55447-5142 United States	Electronic Service		No	PR-25-2
14	Collin	Kremeier	ckremeier@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-	Electronic Service		No	PR-25-2

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						0496 United States				
15	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	PR-25-2
16	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	PR-25-2
17	Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	PR-25-2
18	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	PR-25-2
19	Jennifer	Peterson	jppeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	PR-25-2
20	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	PR-25-2
21	Jodi	Schinzling	jodischinzling@nweco.com	Northwestern Wisconsin Electric Company		104 S. Pine Street Grantsburg WI, 54840 United States	Electronic Service		No	PR-25-2
22	Lori	Schultz	lorischultz@minncap.org	Minnesota Community Action Partnership		MCIT Building 100 Empire Dr Ste 202 St. Paul MN, 55103 United States	Electronic Service		No	PR-25-2
23	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	PR-25-2
24	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	PR-25-2
25	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	PR-25-2
26	Katherine	Teiken	katherine.teiken@state.mn.us			400 Wabasha St N Suite 400 Saint Paul MN, 55102 United States	Electronic Service		No	PR-25-2