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Minneapolis, MN 55459-0038

March 18, 2021

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

RE: In the Matter of the Petition of CenterPoint Energy Minnesota Gas for Approval of a Variance from Minnesota Rule 7820.5300 DETERMINATION OF DELINQUENCY Related to its Automatic Bank Draft Plan for Customer-Selected Due Dates

Docket No. G-008/M-21-96

Reply Comments

Dear Mr. Seuffert:

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, ("CenterPoint Energy" or the "Company") respectfully submits these reply comments in response to the March 8, 2021, initial comments filed in this docket by the Minnesota Department of Commerce ("Department"). As set forth herein, the Company responds to the recommendations the Department included in their March 8, 2021 initial comments, and we thank the Department for their review and analysis of the Petition.

Sincerely,

/s/ Seth DeMerritt

Seth DeMerritt
Manager, Regulatory Affairs

C: Service List

STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

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

In the Matter of a Petition by CenterPoint Energy
Minnesota Gas for Approval of a Variance from
Minnesota Rule 7820.5300 DETERMINATION OF
DELINQUENCY Related to its Automatic Bank Draft
Plan for Customer-Selected Due Dates

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REPLY COMMENTS

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, (“CenterPoint Energy” or the “Company”) respectfully submits the following Reply Comments to the Minnesota Public Utilities Commission (“Commission”).

The Company’s Petition in this docket requested an indefinite variance from Minnesota Rule 7820.5300, subp. 2 to allow the Company to continue to offer its AutoPay program in its current form. Minnesota Rule 7820.5300 requires that the due date printed on customer bills will not be greater than five days from the next scheduled billing date. Along with the variance request, the Company also requested discontinuation of the previously required annual reporting concerning the AutoPay program.

The Minnesota Department of Commerce, Division of Energy Resources (“Department”), provided Initial Comments on March 8, 2021, concluding that the Company’s request for a variance to Minnesota Rule 7820.5300 conflicts with Minnesota Rule 7820.3500, item G, which requires bills to include the date on which the bill will become delinquent. CenterPoint Energy’s current practice, which it proposes to continue, is to print the customer-selected withdrawal date as the due date on AutoPay customers’ bills. Additionally, the Department requests that the Company explain whether the phrase “Enroll in AutoPay today. See form on the back of this stub” is printed on all AutoPay customer bills, and, if it is, whether it creates confusion for AutoPay customers, and whether the statement can be modified on the bills of AutoPay Customers.

The Department proposes two alternatives for the Commission to consider with respect to CenterPoint Energy's Petition: (1) grant a variance to both Minn. R. 7820.3500, item G and Minn. R. 7820.5300, subp. 2 or (2) deny the Company's proposed variance from Minn. R. 7820.5300 and require the Company to print the date on which the bill will become delinquent in the "DUE DATE" section of all customer bills, including AutoPay customers.

The Company supports the Department's first option to approve variances to both Minnesota Rule 7820.5300 and Minnesota Rule 7820.3500, item G. The Company would also support the Department recommendation that such variances be for a temporary six-year period as opposed the indefinite extension the Company requested.

The concern the Company has with the Department's second option of printing the delinquent date of the bill in the due date section of the bill as opposed to the customer selected withdrawal date, is that customers may confuse the due date with the date of withdrawal and an unexpected overdraft of the customer's funds could occur as a result. CenterPoint Energy currently has approximately 325,000 customers enrolled in the AutoPay program. Changing the due date in the bill to reflect the delinquent date rather than continuing the current practice of showing the withdrawal date would be likely to cause confusion for customers who are used to the current presentation.

Regarding the Company bill print, the Company confirms that AutoPay program customers do not have the phrase "Enroll in AutoPay today. See form on the back of this stub". Instead AutoPay program customers see a section labeled "Has your AutoPay bank account changed?". This section walks the AutoPay customers through the process of how to update their bank account information for AutoPay.

Finally, the Company appreciates the Departments analysis regarding the annual reporting and recommendation to discontinue the AutoPay program compliance reports.

Conclusion

The Company thanks the Department for its review and analysis and requests that the Commission approve variances to Minn. R. 7820.5300 and Minn. R. 7820.3500, item G in order to allow the Company to continue to offer its AutoPay program in its current form as previously approved, and to discontinue annual reporting.

CERTIFICATE OF SERVICE

Wakila Johnson served the above Reply Comments and Exhibits of CenterPoint Energy to all persons at the addresses indicated on the attached list by having the document delivered by electronic filing.

/s/

Wakila Johnson
Regulatory Analyst Assistant
CenterPoint Energy

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Steven	Clay	Steven.Clay@CenterPointEnergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-96_M-21-96
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	Yes	OFF_SL_21-96_M-21-96
Seth	DeMerritt	Seth.DeMerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-96_M-21-96
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-96_M-21-96
Erica	Larson	erica.larson@centerpointenergy.com	CenterPoint Energy	505 Nicollet Avenue P.O. Box 59038 Minneapolis, Minnesota 55459-0038	Electronic Service	Yes	OFF_SL_21-96_M-21-96
Amber	Lee	Amber.Lee@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-96_M-21-96
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	Yes	OFF_SL_21-96_M-21-96
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-96_M-21-96