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June 10, 2020

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

**RE: In the Matter of the Request of Minnesota Regulated Gas and Electric Utilities for Authorization to Track Expenses Resulting from the Effects of COVID-19 and Record and Defer Such Expenses into a Regulatory Asset
Docket No. E,G-999/M-20-427**

Dear Mr. Seuffert:

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas (“CenterPoint Energy” or “Company”), respectfully submits this Initial Filing in response to the Minnesota Public Utilities Commission’s (“Commission”) May 20, 2020, Notice of Comment Period (“Notice”) in the above-captioned matter.¹ The Company appreciates the opportunity to submit this initial filing. As has been mentioned in this docket, utilities are facing unique circumstances caused by the COVID-19 pandemic, and the magnitude of the pandemic’s effect cannot be known at this time. Rather, the Commission will review any filing for recovery of deferred costs at a later time to evaluate the significance, reasonableness and incremental nature of the costs incurred. Therefore, the Company appreciates this opportunity to inform the record with the practices it intends to use to track and record costs that will be evaluated at a later date. The Notice specifically noted a number of topics for comment and the Company responds below.

I. Methodologies for Tracking Costs, Revenues and Offsets within Specific Categories

The first topics for comment are whether the accounting methodologies proposed for tracking costs, revenues and grants incurred or received are reasonable and allow utilities to adequately define costs and revenues within specific categories.

The Company intends to clearly identify costs, revenues, and offsets with particularity. All amounts recorded in a regulatory asset must be sufficiently itemized to allow for a determination of whether the particular costs or expenses are properly recoverable in both type and amount. Regulatory assets, as defined in the Federal Energy Regulatory Commission Uniform System of Accounts, are assets that result from rate actions of regulatory agencies. Regulatory assets arise from specific revenues, expenses, gains or losses that would have been included in a net income determination in one period under the general requirements of the Uniform System of Accounts but for it being probable that such items will be included in a different period for purposes of developing the rates the utility is authorized to charge for its utility services. Therefore, any costs

¹ The Company is also a party to the Joint Comments concurrently filed by utilities in this docket.

that the Company may request for future recovery should be included within the regulatory asset. Conversely, costs that the Company does not contemplate requesting recovery for will not be recorded as a regulatory asset.

Although not all impacts are known at this time, the Company anticipates it will defer the following to a regulatory asset and may request recovery of the deferred expenses and foregone revenue in a future filing:

- 1) Uncollectible expenses: incremental bad debt expense arising from unpaid customer bills.
- 2) Operating expenses (labor and non-labor): procurement of personal protective equipment (PPE) and costs to sanitize facilities; technology costs associated with enabling remote work; overtime or contractor costs due to quarantined employees and other circumstances related to COVID-19; any government-required testing that utilities or employers may be required to undertake; additional staging sites necessary to create social distancing and ensure continuous operations; employee-related expenses; and incremental credit and collection costs incurred to disconnect customers once the moratorium is lifted.
- 3) Revenue impacts: lost revenues in excess of the Company's decoupling margin; waived late fees; and waived reconnection fees.
- 4) Off-sets: savings attributable to the suspension of disconnections, as well as recognition of any reduced level of expense attributable to the change in operations caused by the state emergency. Savings are not expected to be material but would include any offsetting amounts or incremental cost reductions due to the COVID-19 emergency not included in the cost categories. Savings may include incremental reductions in transportation costs, contract labor, employee meals, and travel. Additionally, although not expected to occur, any related reimbursements, state or federal relief would be included as an offset to the COVID impacts that may be included in a future request for recovery.

The Company does not currently have any estimates for the magnitude of costs to be incurred and deferred; we are just receiving preliminary numbers for costs incurred since the state of emergency was declared in March 2020. Because we cannot speculate as to when the emergency will be lifted or the duration of the recovery period, we do not have estimates of the final costs and savings that will be incurred in totality. Similarly, because state and federal efforts to provide relief related to COVID-19 are ongoing, we cannot foresee all the federal assistance or benefits that could become available through the CARES Act or similar state programs.²

The Company will track costs, savings, revenue impacts and other benefits that may arise from federal or state legislation related to the state emergency and will report all impacts. We recognize that a certain amount of bad debt costs, for example, are already authorized in rates, and therefore we will take care to deliberately analyze the incremental nature of the expenses incurred before recording those to the regulatory asset. Specifically, the Company intends to undertake these

² On March 25, 2020, the federal Coronavirus Aid, Relief, and Economic Security ("CARES") Act was signed into law. The CARES Act makes a number of changes to federal tax law, some of which may affect the tax liability of utilities. The Company anticipates that federal assistance programs enacted as part of CARES, including the enhanced unemployment provisions and small business loans, will likely have an indirect benefit to utilities by assisting their customers in making utility payments, but would not have a direct effect on costs and savings occurred.

four steps in recording costs, revenues and offsets incurred related to the state-declared emergency:

- (1) Identify incremental costs, forgone revenues and offsetting savings resulting from the pandemic;³
- (2) Document and track those costs, foregone revenues and savings to a variety of accounts, including those related to customer accounts, sales expense, and administrative and general expenses;
- (3) If applicable, allocate the costs, foregone revenues and offsetting savings to the proper business unit; and
- (4) Confirm that the costs and foregone revenue are incremental and attributable to the pandemic before seeking their recovery in a future proceeding.

As our tracking procedures relate to savings, the Company notes that the accounting system is designed to track costs, as opposed to the absence of costs. To track savings for purposes of this docket the Company will therefore provide an analysis using actual costs compared to costs in rates.

At this time the Company suggests that the need for an all-inclusive list of possible impacts is not warranted, but the Company intends to create tracking accounts specific and limited to COVID-19 costs. We will similarly track any federal and state reimbursements provided to utilities for possible offset of costs associated with the pandemic. The Company will seek recovery of these net amounts at a later date, and at that time the Company will provide documentation that the costs, expenses and revenues are fully and separately accounted for and attributable to the COVID-19 pandemic.

II. Quarterly Reporting

In regard to reporting, the Company recommends utilities file quarterly reports for each fiscal quarter. In terms of timing, the Company recommends a one-month lag between close of the quarter and the filing of that quarterly report. The Company requests the Commission authorize the first quarterly report to be filed by the utilities on August 1, 2020, including impacts through June 30, 2020, and each successive three months thereafter. Nothing submitted in preliminary reports should be determined to be a finding for ratemaking purposes as to any amount or the appropriate method for recovery. Such analysis and determination should be reserved for future proceedings.

³ The determination of "incremental" will be made on a case-by-case basis, after comparison to the most appropriate baseline, e.g, three-year average or last-approved annual cost.

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III. Conclusion

The Company thanks the Commission for this proactive approach to build the record in this docket to streamline future requests for recovery. 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

CERTIFICATE OF SERVICE

Erica Larson served the above Comments 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
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