



May 14, 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

**REPLY 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 Reply Comments in the above referenced docket.

Through its Notice of Extended Comment Period, the Commission sought insight into the Monthly Residential Customer Status Reports filed in Docket No. E,G-999/PR-24-2 on November 27, 2024. The Citizens Utility Board of Minnesota ("CUB") and the Legal Services Advocacy Project ("LSAP") submitted comments April 18, 2025.

Request No. 3 (a), (b), (c) as written by CUB and LSAP reads:

- 3. Require regulated utilities to post the following language on their respective websites in a conspicuous place:
  - a. Under Minnesota law, [UTILITY NAME] customers are entitled to a payment agreement for the payment of overdue bills. This payment agreement must consider a customer's financial circumstances and any extenuating circumstances of the household.
  - b. If the payment agreement terms offered are not affordable to you, or if your household is facing financial or extenuating circumstances, you should contact a(n) [UTILITY NAME] customer account representative at [PHONE NUMBER and/or EMAIL ADDRESS].
  - c. If you are unable to reach a mutually agreeable arrangement with a customer account representative, you may appeal the decision with the Minnesota Public Utilities Commission's Consumer Affairs Office. The Consumer Affairs Office can be contacted at 651-296-0406 or 800-657-3782, or by email at consumer.puc@state.mn.us.

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The Company reads request no. 3 (a) as meeting the need for agreements to consider household circumstances, request no. 3 (b) directing customers to work with the utility on said agreement, again taking into consideration household financial or extenuating circumstances; and request no. 3 (c) as a course of action with the Minnesota Public Utilities Commission's Consumer Affairs Office for the customer, if the customer and the Company are unable to reach a mutually agreeable arrangement.

The Company originally proposed the following change

b. If the payment agreement terms offered are current bill is not affordable to you, or if your household is facing financial or extenuating circumstances, you should contact a CenterPoint Energy customer account representative at 800-245-2377 and/or Company can provide a link for the "contact us" form.

To provide inclusion of all customers regardless of a payment plan, and keeping the understanding and intent of CUB and LSAP suggestion; the Company proposes to adjust request no. 3 (b)

b. If the <u>current bill or payment</u> agreement terms offered are not affordable to you, or if your household is facing financial or extenuating circumstances, you should contact a CenterPoint Energy customer account representative at 800-245-2377 and/or Company can provide a link for the "contact us" form.

As CUB and LSAP noted in their April 18, reply comments, the Company, CUB and LSAP are generally aligned. However, CUB and LSAP requested the Commission reject CenterPoint Energy's language in request no. 3 (b), because CenterPoint already includes information on its website notifying customers about payment agreement opportunities if they are behind on their bills. The language they (CUB/LSAP) are seeking in request no. 3 (b) is focused on the need for agreements to consider household circumstances.

The intent of the Company's change was to inform all customers, regardless of if they do or do not have a payment arrangement, on the general availability of this option and that they can contact CenterPoint Energy to reach a mutually agreeable arrangement.

The Company continues to support a proposed language change to provide clarity to all customers and focus on current bill affordability wholistically, because CenterPoint Energy wants this message to be clear to customers who are not able to afford their current bill with or without a payment arrangement.

If you have questions, please contact me at sherry.kemmetmueller@centerpointenergy.com or 612-321-5191.

Sincerely,

/s/ Sherry Kemmetmueller

Manager, Regulatory Affairs

Attachment

C: Service List

## **CERTIFICATE OF SERVICE**

I, Christina Benning, certify that on Wednesday, May 14, 2025, I served the attached Reply 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@mnlsap.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@otpco.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	jjpeterson@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	Schinzing	jodischinzing@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