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February 10, 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-24-2

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.

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

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

**Katie J. Sieben
Joseph K. Sullivan
Audrey Partridge
Hwikwon Ham
John A. Tuma**

**Chair
Vice Chair
Commissioner
Commissioner
Commissioner**

In the Matter of Recent Utility Cold Weather
Rule Data

Docket No. E,G-999/PR-24-2

REPLY COMMENTS

I. INTRODUCTION

CenterPoint Energy Resources Corp d/b/a CenterPoint Energy Minnesota Gas (“CenterPoint Energy” or the “Company”) respectfully 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 January 31, 2025.

The Commission raised the issue “Should the Commission take any action on the residential customer status data reported in Docket No. E,G-999/PR-24-2; including service disconnections, payment arrangements, and various customer protections and assistance?” The topic open for comment included:

1. Considering the data filed in Docket No. E,G-999/PR-24-2, should any trends in the data be highlighted for the Commission?
2. What action, if any, should the Commission require utilities to take to continue to exemplary performance or remedy unsatisfactory performance?
3. What does an analysis of the data reported in this docket reveal about equitable delivery of utility service?
4. Are there other issues or concerns related to this matter?

CUB and LSAP filed their reply comments on January 31, 2024, with stated recommendations of:

1. Require regulated utilities to submit a compliance filing in the instant docket detailing their current policies and practices on disconnections, service deposits, and payment agreements. Require regulated utilities to submit additional filings in Docket

No. E,G-999/PR-YR-02 whenever there are changes to their disconnection, service deposits and payment agreement policies and practices. For those companies requiring down payments or service deposits, these reports must include an explanation of how those amounts are determined.

2. Require regulated utilities to display their disconnection, service deposit, and payment agreement policies and practices on their respective websites, and explain those procedures in clear, easy-to-understand language.
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.
4. Require regulated utilities to detail in their next annual safety, reliability and service quality report the average down-payment amount received from customers—both as a percentage of arrears and as a total dollar value—during CWR and non-CWR months. Regulated utilities must also explain how they have implemented the statutorily required consideration of both financial and extenuating circumstances for payment agreements during CWR and non-CWR months.
5. Require regulated utilities to provide a discussion on their next safety, reliability, and service quality report about how they manage disconnections due to a landlord's failure to pay, consistent with the requirements of Minn. R. 7820.1400.
6. Require regulated utilities to include in their next annual affordability program reports a description of their current outreach activities to low-income customers about free and low-cost ECO programs. Require utilities to propose methods for improving ECO outreach to affordability program participants.

II. CenterPoint Energy Response

CenterPoint Energy reviewed the response from CUB and LSAP in their comments filed January 31, 2025, in this docket. CenterPoint Energy recognizes the focus in this docket on the required reporting and understands the request for further transparency in processes. The Company takes energy burden seriously and provides resources on safety, energy savings and bill management to assist customers. The Company currently provides detail on coordinating efforts and outreach on its affordability programs and Energy Conservation Optimization ("ECO") in Docket No. G-008/M-19-367¹ on a quarterly basis and in Docket No. G-008/M-YR-

¹Docket No. G-008/M-19-367 "In the Matter of Periodic Gas Affordability Program evaluation reports for CenterPoint Energy".

38² in the annual compliance filing on the Gas Affordability Program (“GAP”). In 2024 CenterPoint Energy started automatic enrollment of Low-Income Home Energy Assistance Program (“LIHEAP”) customers in the GAP program thereby further reducing the financial burden of energy on LIHEAP customers.

The Company has provided, and will continue to provide, information beyond the current required reporting in corresponding dockets. With a comprehensive billing system entailing many intricacies, the Company is collaboratively establishing transparency of payment practices, providing information to customers on disconnection, payment agreement, and billing practices to all customers in its Reply Comments in Docket No. G008/C-24-191.³

III. CONCLUSION

Providing safe, reliable and affordable service to more than 920,000 customers is principal to CenterPoint Energy. The Company supports the transparency of processes to consumers on billing practices, payment agreements and disconnections. The Company encourages customer interaction providing resources to customers who may be facing hardship, creating payment arrangements and referring customers to other resources that may be available.

CenterPoint Energy supports the following recommendations by CUB and LSAP duplicative of CenterPoint Energy’s Reply Comments numbers 3 through 5 in Docket No. G-008/C-24-191.⁴

1. CenterPoint Energy ~~must~~ will submit a compliance filing in Docket No. E,G-999/PR-YR-02 whenever the Company modifies its disconnection, payment agreement, or billing practices.
2. CenterPoint Energy ~~must~~ will post the following information in a conspicuous place on its website using easy-to-understand language:
 - a. Costs of gas service are subject to regulation while payments for merchandise and Home Service Plus® (“HSP”) services are not subject to the same regulatory oversight.
 - b. Merchandise and HSP arrears cannot form the basis for customer disconnection.
 - c. The default order in which customer payments are applied and what actions a customer must take to adjust these payment allocations.
 - d. The manner in which disconnections are carried out, including any threshold arrearage balance used to determine whether a customer is liable for disconnection.
 - e. Payment agreement requirements employed by the Company, including the methodology used to determine the down payment amount requested from customers.
3. CenterPoint Energy ~~must~~ will post the following language in a conspicuous place on its website:
 - a. Under Minnesota law, CenterPoint Energy customers are entitled to a payment agreement for the payment of arrears. This payment agreement must consider a

²Docket No. G-008/M-YR-38 “Annual Compliance Submission of CenterPoint Energy for its Gas Affordability Service Program”.

³Docket No. G-008/C-24-191 “In the Matter of the Consumer Appeal of Consumer Complaint 82340”.

⁴CenterPoint Energy’s Reply Comments.

customer's financial circumstances and any extenuating circumstances of the household.

- 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.
- 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.

CERTIFICATE OF SERVICE

I, Melodee Carlson Chang, certify that on Monday, February 10, 2025, I served the attached Reply Comments of CenterPoint Energy on the attached service list for Docket No. E,G-999/PR-24-2. The filing was delivered electronically or, if indicated on the attached service list, placed in the U.S. Mail at Minneapolis, Minnesota.

/s/ Melodee Carlson Chang
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	24-2PR-24-2
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	24-2PR-24-2
3	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-2PR-24-2
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	24-2PR-24-2
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	24-2PR-24-2
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	24-2PR-24-2
7	Bridget	Dockter	bridget.dockter@xcelenergy.com			null null, null United States	Electronic Service		No	24-2PR-24-2
8	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	24-2PR-24-2
9	Ron	Elwood	relwood@mnlisap.org	Legal Services Advocacy Project		970 Raymond Avenue Suite G-40 Saint Paul MN, 55114 United States	Electronic Service		No	24-2PR-24-2
10	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	24-2PR-24-2
11	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	24-2PR-24-2
12	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	24-2PR-24-2
13	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	24-2PR-24-2
14	Jack	Kegel	jkegel@mmua.org	MMUA		3025 Harbor Lane N Suite 400 Plymouth MN, 55447-5142 United States	Electronic Service		No	24-2PR-24-2

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
15	Collin	Kremeier	ckremeier@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	24-2PR-24-2
16	Annie	Levenson Falk	annief@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	24-2PR-24-2
17	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	24-2PR-24-2
18	Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	24-2PR-24-2
19	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	24-2PR-24-2
20	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-2PR-24-2
21	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	24-2PR-24-2
22	Jodi	Schinzling	jodischinzling@nweco.com	Northwestern Wisconsin Electric Company		104 S. Pine Street Grantsburg WI, 54840 United States	Electronic Service		No	24-2PR-24-2
23	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	24-2PR-24-2
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	24-2PR-24-2
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	24-2PR-24-2
26	Katherine	Teiken	katherine.teiken@state.mn.us			400 Wabasha St N Suite 400 Saint Paul MN, 55102 United States	Electronic Service		No	24-2PR-24-2