

July 13, 2022

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G008/M-22-237

Dear Mr. Seuffert:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

In the Matter of CenterPoint Energy's Paperless Billing Customer Initiative.

The Petition was filed on May 25, 2022 by:

Seth DeMerritt
Manager, Regulatory Affairs
CenterPoint Energy

The Department recommends approval of the initiative and is available to answer any questions the Minnesota Public Utilities Commission (Commission) may have. Provided other parties do not submit comments or reply comments disputing the Department's recommendations or raising novel issues, the Department concludes that the recommendations below meet the requirements in Minnesota Rules 7829.1050 to warrant inclusion on the Commission's consent calendar.

Sincerely,

/s/ Will Nissen
Public Utilities Rates Analyst

Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. G008/M-22-237

I. INTRODUCTION

On May 25, 2022, CenterPoint Energy (Company or CenterPoint) filed an Informational Filing with the Minnesota Public Utilities Commission (Commission) providing information regarding the Company's initiative to auto enroll customers into paperless billing who have already chosen to use CenterPoint's online service (Filing).

On June 14, 2022, the Commission issued a Notice of Comment Period (Notice).

The Minnesota Department of Commerce (Department) provides the following analysis and recommendations.

II. SUMMARY OF FILING

CenterPoint's Filing informs the Commission of its initiative to auto enroll customers "who have already chosen to use CenterPoint Energy's online service, My Account, so that these customers receive paperless billing beginning July 2022."¹ The Company stated that customers that are auto enrolled can choose to continue receiving paper bills.

Notably, CenterPoint is implementing this initiative across four service areas, including Minnesota. The Company plans to implement the initiative in two phases totaling approximately 300,000 customers in its first phase, and up to 511,000 total in its second phase.² Phase 1 would target approximately 77,000 customers in Minnesota who are "currently engaged electronically with the Company,"³ meaning they are already enrolled in My Account and use auto draft to pay bills. Customers in Phase 1 would have several opportunities to remain on paper billing and return to paper billing at any time. Phase 2 would begin in 2023 and include all remaining customers that use My Account.⁴ The Company stated that it would incorporate customer feedback from Phase 1 into Phase 2 implementation.

CenterPoint cited several benefits that paperless billing provides to customers, such as convenience, access, positive environmental impacts, and reduced clutter, and to the Company, such as operational

¹ Filing. Page 1.

² *Id.* Page 3.

³ *Id.* Page 2.

⁴ Email correspondence between the Company and the Department.

savings, improved processing and cash flow, reduction in call center traffic, and positive environmental impacts.⁵

Much of the Filing focused on CenterPoint's efforts to address issues raised by the Consumer Affairs Office (CAO) in a meeting held April 26, 2022. The Company highlighted five issues raised by the CAO and discussed how the Company plans to address each issue as follows:

1. **Auto enrolling customers with an opt-out approach versus opt-in** – CenterPoint stated that it is enrolling customers using an opt-out method to increase customer participation. The Company emphasized that customers would receive multiple communications through a variety of avenues (website, emails, and bill inserts) and have opportunities throughout the transition to maintain or return to paper billing. While customers already have the option of opting into paperless billing, the Company stated that it hopes the opt-out initiative will increase participation from the current 33% level to a range of 45-55%.⁶
2. **Customers without electronic access or difficulty using electronic services** – CenterPoint emphasized that the paperless billing initiative “is only for customers who have chosen to use the Company’s online service, My Account.”⁷ The Company stated that these are customers who have already demonstrated a willingness to use computer technology regarding their utility services. The Company also noted that customers with visual impairments would not be included in the initiative based on their unique billing indicator.
3. **Concerns around the disconnection process** – The Company cited Minnesota rules and statutes around the disconnection process and stated that all requirements related to disconnection would remain applicable to the paperless billing initiative.⁸
4. **Size, design, and implementation of the initiative** – CenterPoint stated that the CAO “questioned the overall size of the phases and [the Company’s] plan for stabilization checkpoints, implementation processes, and the testing of opt-out procedures.”⁹ The Company emphasized that this initiative is enterprise-wide across four service territory jurisdictions. CenterPoint stated that between Phase 1 and Phase 2 it will “monitor customer issues, and implement fixes, conduct system testing and monitor processes, including social media reaction, specifically negative reactions, increased online de-enrollment, in addition to working with [its] call center representatives to monitor any increase in calls as [the Company] gauge[s]

⁵ Filing. Page 1.

⁶ *Id.* Page 2.

⁷ *Id.* Page 3.

⁸ *Id.* Page 3.

⁹ Filing. Page 3.

customer reaction before Phase 2 implementation.”¹⁰ The Company admitted to billing issues in the past but stated that it has proactively made changes to increase bill accuracy.

5. **Best practices for auto enrollment into paperless billing** – CenterPoint stated that it has engaged other utilities to gain insights and lessons learned regarding a transition to paperless billing, including Florida Power & Light, Xcel Energy, Consumers Energy, and Reliant Energy.

III. CONCLUSIONS AND RECOMMENDATIONS

The Department has reviewed the Filing and concludes that CenterPoint has sufficiently addressed the concerns raised by the CAO as presented in the Filing. The initiative is part of a multi-jurisdiction effort to streamline processes, reduce costs, and simplify interactions with customers. The Company has engaged other utilities regarding best practices for paperless billing transitions, and customers would have multiple opportunities to opt back into paper billing at any time. The Company’s phased approach provides the opportunity to assess issues that arise and modify implementation before all customers under My Account are transitioned to paperless billing in Phase 2. As noted by the Company, the initiative does not propose any changes to disconnection procedures and all requirements established in Minnesota rules and statutes would still apply under the paperless billing initiative.

The Department recommends that the Commission approve CenterPoint’s paperless billing customer initiative.

¹⁰ *Id.*

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. G008/M-22-237

Dated this **13th** day of **July 2022**

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_22-237_M-22-237
Seth	DeMerritt	Seth.DeMerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-237_M-22-237
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_22-237_M-22-237
Amber	Lee	Amber.Lee@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_22-237_M-22-237
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_22-237_M-22-237
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_22-237_M-22-237