

November 10, 2021

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. G008/MR-21-436

Dear Mr. Seuffert:

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

A Petition by CenterPoint Energy Gas Resources Corp., d/b/a CenterPoint Energy Minnesota Gas (CPE, CenterPoint, or the Company) for Approval of a New Base Cost of Gas for Interim Rates.

The Petition was filed on November 1, 2021 by:

Donald Wynia  
Regulatory Analyst  
CenterPoint Energy Minnesota Gas  
505 Nicollet Mall,  
Minneapolis, Minnesota 55402

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve as modified herein** CenterPoint's base cost of gas filing and is available to answer any questions the Commission may have.

Sincerely,

/s/ Sachin Shah  
Rates Analyst

SS/ja  
Attachment



## Before the Minnesota Public Utilities Commission

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### Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. G008/MR-21-436

#### I. INTRODUCTION

CenterPoint Energy Gas Resources Corp., doing business as CenterPoint Energy Minnesota Gas (CPE, CenterPoint, or the Company), requests that the Minnesota Public Utilities Commission (Commission) approve a new base cost of gas (BCOG) to coincide with the proposed January 1, 2022 implementation of interim rates as requested in its general rate case in Docket No. G008/GR-21-435 (Docket 21-435). CPE filed its general rate case on November 1, 2021, the same day as its BCOG Petition. The Minnesota Department of Commerce, Division of Energy Resources' (Department) analysis of CenterPoint's Petition is presented below.

#### II. DEPARTMENT'S ANALYSIS

Minnesota Rules part 7825.2700, subpart 2, requires a utility to petition for a new base cost of gas, submitted as a miscellaneous rate change, to coincide with the implementation of interim rates during a general rate proceeding. This Rule requires that "The base cost of gas must separately state the commodity base cost and the demand base cost components for each class." Through its review of CenterPoint's Petition, and for the Petition's consistency with the calculations in the general rate case, the Department concludes that the Company has complied with these requirements through its Volume 1 – Financial Information, Schedules A through G, and the testimony, exhibits, workpapers, and associated schedules of Company witness Nicole A Gilcrease (Exhibit \_\_\_ (NAG-D), in its rate case filing; and through its supporting data and calculations provided in Attachments B through E in the Petition. The Department discusses CenterPoint's demand and commodity costs separately below.

##### A. DEMAND GAS COSTS

The Department reviewed CenterPoint's Petition for consistency with the calculations in the rate case. The Department's analysis indicates that the information is generally consistent between the rate case and the base cost of gas filing with a minor rounding difference.<sup>1</sup> CenterPoint calculated its demand cost of gas based on the demand entitlement units and costs, filed on July 1, 2021 in Docket No.

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<sup>1</sup> In the Petition at Attachment E, the total demand costs are approximately \$145,239,074 and in the rate case for example in Direct Testimony of Nicole A Gilcrease (Exhibit \_\_\_ (NAG-D), Schedule 46; however, the total demand costs embedded in the calculations in Volume 1 – Financial Information, Schedule E-2 are approximately \$145,239,822, resulting in a difference of \$748. Volume 1 is available in eDockets in Docket No. G008/GR-21-435, Document ID 202111-179375-01.

G008/M-21-523, that are estimated to be charged beginning in the Company's November 2021 Purchased Gas Adjustment (PGA) filings.<sup>2</sup> The Department will file its comments in Docket 21-523 later.

The Department notes that the demand costs are based on the interstate pipeline rates of Northern Natural Gas (Northern or NNG), Viking Gas Transmission (VGT), and Trailblazer Pipeline Company LLC (TPC), including any existing negotiated agreements that CPE might have with the pipelines.

On July 1, 2020, CenterPoint filed a Petition in Docket No. G008/M-20-565 (Docket 20-565) requesting that the Commission approve a \$49.8 million increase, effective July 1, 2020, in demand costs. The Company noted that the requested \$49.8 million increase was due to a contracted capacity expansion of 34,800 Dth, agreed to as part of NNG's Northern Lights open season. This capacity expansion is expected to be operational in November 2021.

Regarding cost recovery of that \$49.8 million associated with the contracted capacity expansion of 34,800 Dth, CenterPoint paid that amount to NNG as a Contribution-in-Aid-of-Construction (CIAC) before construction began. On July 29, 2021 in Docket 20-565, the Commission issued an *Order Accepting Demand Entitlement Level and Disallowing Recovery of Certain Costs* (July 29 Order).

On August 18, 2021, CenterPoint filed a petition for reconsideration of the Commission's July 29 Order under Minn. Stat. § 216B.27. The Company had re-negotiated its contract with NNG to extend payment over 14 years in lieu of the one-time, up-front payment. The Company would begin recovery from its customers of the new payment structure to NNG effective November 1, 2021.

On September 13, 2021, the Department filed comments in Docket 20-565 on the petition and did not oppose the Company's revised approach. On October 13, 2021 the Commission issued its *Order Granting Petition for Reconsideration* in Docket 20-565.

The Department also notes that in its October 29, 2021 comments in Docket No. G008/M-21-102 (Docket 21-102), the Department recommended denying recovery of demand costs associated with the Capacity Release Contract and the Asset Management Agreement proposed in that filing. This docket is currently pending. In addition, these costs from docket 21-102 are included in the Company's filing in Docket 21-523.

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<sup>2</sup> See CenterPoint's July 1 2021 Demand Entitlement Filing, Exhibit A, and October 25, 2021 Supplemental Filing in Docket No. G008/M-21-523.

The Department notes that the Company, among other changes, has now also included the re-negotiated contract with NNG in its October 25, 2021 Supplemental Filing in Docket 21-523. The Company noted that demand costs had increased by approximately \$18.6 million. These costs would not be included in the Petition given the timing differences and the fact that the Company relied on the July 1, 2021 filing in Docket No. 21-523.

In Docket 21-435, the Direct Testimony of company witness Nicole A. Gilcrease, at pages 70 through 78, describes the derivation of the commodity and demand costs of gas and how gas costs also affect the level of cash working capital and storage inventory costs included in the company's general rate case.<sup>3</sup> In CenterPoint's BCOG filing in Docket No. G008//MR-17-591, Commission Staff in the August 25, 2017 Staff Briefing Papers, on page 3 stated the following:<sup>4</sup>

Staff points out that commodity gas costs, although recovered dollar for dollar, is a component of total revenue and total revenue is either a component or the "driver" for various test year estimates such as bad debt expense, late payment fees and storage costs. For instance, proposed test year bad debt expense is calculated as 0.96% of firm revenue; therefore, a 10% fluctuation (\$43.645 million) in commodity gas costs would impact bad debt expense by \$419,000.

The Commission has required companies during the proceedings, to provide updated BCOG information reflecting changes in commodity and demand costs.<sup>5</sup>

Thus, the Department recommends that CenterPoint provide updated cost of gas information in this proceeding and in its companion general rate case. The Commission should require CenterPoint to work with Commission and Department Staff to determine the appropriate timing for providing this information and whether the update(s) to the information should be applied to CenterPoint's BCOG and reflected in the accompanying general rate case. The update(s) should be filed in both this docket and in the general rate case Docket 21-435. Additionally, when the Company files its final base cost of gas pursuant to Minn. R. pt. 7825.2700, subp. 2, the cost of gas in that filing should equal the cost of gas approved for use in the general rate case.<sup>6</sup>

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<sup>3</sup> This testimony is available in eDockets in Docket No. G008/GR-21-435, Document ID 202111-1729373-05.

<sup>4</sup> The staff briefing papers are available in eDockets in Docket No. G008/MR-17-591, Document ID 20178-135004-01.

<sup>5</sup> See for example, the Commission's *December 5, 2017 Order Setting New Base Cost of Gas for Interim Rate Period* in Docket No. G011/MR-17-564, *September 29, 2017 Order Setting New Base Cost of Gas* in Docket No. G008/MR-17-591, and *December 18, 2019 Order Setting New Base Cost of Gas* in Docket No. G008/MR-19-525, respectively.

<sup>6</sup> Minn. R. pt. 7825.2700, subp. 2, states in part: "A new base gas cost must also be part of the rate design compliance filing submitted as a result of a general rate proceeding."

Finally, in its review of demand costs, the Department found no inconsistencies between the sales forecast reported in the rate case filing and that which was presented in the base cost of gas Petition.

*B. COMMODITY GAS COSTS*

The Company's price forecasts were based on estimated New York Mercantile Exchange (NYMEX) Henry Hub gas prices over the period January 2021 to December 2022 as provided by CenterPoint's Gas Supply Group. CenterPoint estimated its commodity costs based on forecasted Henry Hub wellhead prices, basis point differentials for delivery of natural gas to Ventura and estimates of lost and unaccounted for gas.<sup>7</sup> This is the same method the Company used in its two prior rate cases and associated base cost of gas filings (Docket Nos. G008/GR-17-285 and G008/MR-17-591; and G008/GR-19-524 and G008/MR-19-525).

The Department compared these estimated commodity cost rates to current NYMEX market expectations and concludes that, currently, the rate estimates are appropriate.

After estimating commodity costs for its customers, CenterPoint calculated the estimated Weighted Average Cost of Gas (WACOG) for each month.<sup>8</sup> CenterPoint calculated its total gas cost recovery amount by multiplying monthly test-year sales amounts by the monthly projected WACOG price.<sup>9</sup> CenterPoint then calculated an average commodity cost of gas of \$3.3507 and CPE expects total 2022 commodity costs to be \$450,029,114.<sup>10</sup>

*C. TOTAL GAS COSTS*

When CenterPoint's proposed demand gas costs (\$145,239,074) and commodity cost of gas (\$450,029,114) are added together, the resulting total gas costs are approximately \$595,268,188.<sup>11</sup> The Department notes that the Company's Direct Testimony of company witness Nicole A. Gilcrease, at pages 70 through 78, describes the derivation of the commodity and demand costs of gas. Based on

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<sup>7</sup> See the direct testimony of Company's witness Nicole A. Gilcrease, at pages 70 through 78, that describes the derivation of the commodity and demand costs of gas. This testimony is available in eDockets in Docket No. G008/GR-21-435, Document ID 202111-1729373-05.

<sup>8</sup> See Company's witness Nicole A. Gilcrease, workpapers Sch.46, WP46.3 that shows the derivation of the commodity cost of gas. This workpaper is available in eDockets in Docket No. G008/GR-21-435, Document ID 202111-179363-08.

<sup>9</sup> See Company's witness Nicole A. Gilcrease, workpapers Sch.46, WP46.1 that shows the derivation of the commodity cost of gas. This workpaper is available in eDockets in Docket No. G008/GR-21-435, Document ID 202111-179363-08.

<sup>10</sup> Petition Exhibit E, Attachment 3. See Company's witness Nicole A. Gilcrease, workpapers Sch.46, WP46.1 that shows the derivation of the commodity cost of gas. This workpaper is available in eDockets in Docket No. G008/GR-21-435, Document ID 202111-179363-08.

<sup>11</sup> Petition Exhibit E, Attachments 2 and 3.

the rate case testimony and required filing, and the work papers noted earlier, the 2022 gas costs reported are \$595,268,936, resulting in a difference between the rate case and base cost of gas Petition of \$748. The Department concludes that the \$748 difference is attributable to rounding and is therefore acceptable.

*D. TARIFFS*

CenterPoint provided its proposed updated interim tariff sheets in both clean and redlined versions as Exhibit D to the Petition. The Department reviewed the proposed interim tariff sheets and concludes that the proposed changes correctly update the base cost of gas values in accordance with the calculations contained in Exhibit E of the Petition. As a result, both the clean and redlined versions of the interim tariff sheets are acceptable. The Department does not generally weigh in on interim rate issues, however since the tariffs are labeled “interim tariffs” along with language in redlined referring to the interim surcharges effective January 1, 2022; should the Commission change the Company’s interim rate proposal, the Department recommends that the Commission require CenterPoint to provide the updated tariff sheets reflecting the Commission’s interim rate decision(s) in this proceeding.

**III. CONCLUSION AND RECOMMENDATIONS**

Based on its review of the Company’s Petition, the Department recommends that the Commission approve CenterPoint’s BCOG filing as modified herein with the following additional recommendations.

The Department recommends that the Commission require that CenterPoint:

- provide updated cost of gas information in this proceeding and in its companion general rate case;
- work with Commission and Department Staff to determine the appropriate timing for providing this information and whether the update(s) to the information should be applied to CenterPoint’s BCOG and reflected in the accompanying general rate case. The update(s) should be filed in both this docket and in the general rate case Docket 21-435; and
- if the Commission changes the Company’s interim rate proposal, require CenterPoint to provide updated tariff sheet reflecting the Commission’s interim rate decision(s) in this proceeding.

## **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/MR-21-436**

**Dated this 10<sup>th</sup> day of November 2021**

**/s/Sharon Ferguson**

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