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August 10, 2022

VIA EDOCKETS

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

**Re: *In re Petitions for Recovery of Certain Gas Costs***  
**MPUC Docket Nos. G-999/CI-21-135, G-008/M-21-138, G-004/M-21-235, G-002/CI-21-610, G-011/CI-21-611**

Dear Mr. Seuffert:

Commission staff requested that the Minnesota Department of Commerce, Citizens Utility Board of Minnesota, and the Office of the Attorney General—Residential Utilities Division (collectively, “Intervenors”) provide further explanation for how Decision Alternative No. 13a for CenterPoint Energy and Decision Alternative No. 6a for Minnesota Energy Resources Corp. were derived.<sup>1</sup> Both of these alternatives were calculated by assuming that each utility should have curtailed 50% of its interruptible customers as recommended by the Department, but for the entire five-day February Event as recommended by the Citizens Utility Board. The associated calculations for each utility are below.

**CenterPoint Energy**

The approximately \$38.6 million amount described in the Intervenor’s Decision Alternative No. 13a for CenterPoint is sum of the avoided spot gas purchases for both the four-day period between February 13 and February 16 plus the avoided spot gas purchases for February 17. As described in the August 8 letter, this is based on curtailment of 50% of all interruptible customers for the entire February Event.

**Curtailment - February 14**

	(a)	(b)	(c)	(d)	(e)	(f)
	<b>Interruptible Load<sup>1</sup></b>	<b>Curtailment Volume</b>	<b>Applicable Length</b>	<b>Total Volume</b>	<b>Price<sup>2</sup></b>	<b>Avoided Spot Purchases</b>
	<i>Dth</i>	<i>Dth</i>	<i>Days</i>	<i>Dth</i>	<i>\$/Dth</i>	<i>\$</i>
<i>Line</i>	<i>(a)</i>	<i>(b)=0.5x(a)</i>	<i>(c)</i>	<i>(d)=(b)x(c)</i>	<i>(e)</i>	<i>(f)=(d)x(e)</i>
(1)	82,241	41,121	4	164,482	190.53	31,337,959

<sup>1</sup> See Intervenor Decision Alternatives Letter (Aug. 8, 2022) (eDocket No. 20228-188203-05).

**Curtailment - February 17**

	(a)	(b)	(c)	(d)
	<b>Interruptible Load<sup>1</sup></b>	<b>Curtailment Volume</b>	<b>Price<sup>2</sup></b>	<b>Avoided Spot Purchases</b>
	<i>Dth</i>	<i>Dth</i>	<i>\$/Dth</i>	<i>\$</i>
<i>Line</i>	<i>(a)</i>	<i>(b)=0.5x(a)</i>	<i>(c)</i>	<i>(d)=(b)x(c)</i>
(1)	82,637	41,319	176.18	7,279,592

1. Docket No. G-999/CI-21-135, OAG IR 118A
2. DOC IR 42(a), Attachment

**Minnesota Energy Resources Corp.**

The approximately \$4.2 million amount described in the Intervenor’s Decision Alternative No. 6a for MERC is sum of the avoided spot gas purchases for both the four-day period between February 13 and February 16 plus the avoided spot gas purchases for February 17. As described in the August 8 letter, this is based on curtailment of 50% of all interruptible customers for the entire February Event.

**Curtailment - February 14**

	(a)	(b)	(c)	(d)	(e)	(f)
	<b>Interruptible Load<sup>3</sup></b>	<b>Curtailment Volume</b>	<b>Applicable Length</b>	<b>Total Volume</b>	<b>Price<sup>4</sup></b>	<b>Avoided Spot Purchases</b>
	<i>Dth</i>	<i>Dth</i>	<i>Days</i>	<i>Dth</i>	<i>\$/Dth</i>	<i>\$</i>
<i>Line</i>	<i>(a)</i>	<i>(b)=0.5x(a)</i>	<i>(c)</i>	<i>(d)=(b)x(c)</i>	<i>(e)</i>	<i>(f)=(d)x(e)</i>
(1)	10,345	5,173	4	20,690	157.24	3,253,394

**Curtailment - February 17**

	(a)	(b)	(c)	(d)
	<b>Interruptible Load<sup>3</sup></b>	<b>Curtailment Volume</b>	<b>Price<sup>4</sup></b>	<b>Avoided Spot Purchases</b>
	<i>Dth</i>	<i>Dth</i>	<i>\$/Dth</i>	<i>\$</i>
<i>Line</i>	<i>(a)</i>	<i>(b)=0.5x(a)</i>	<i>(c)</i>	<i>(d)=(b)x(c)</i>
(1)	9,751	4,875	196.57	958,307

3. Docket No. G-999/CI-21-135, DOC IR 4(A)
4. DOC IR 42, Attachment

The Intervenor’s will be available to answer Commissioner questions or offer any requested clarifications during the agenda meeting scheduled for August 11.

Mr. Will Seuffert  
August 10, 2022  
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Sincerely,

/s/ Katherine Hinderlie

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