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PUBLIC DOCUMENT
Trade Secret Information Has Been Excised

July 1, 2013

Dr. Burl Haar
Executive Secretary
Minnesota Public Utilities Commission
350 Metro Square Building
121 East Seventh Place, Suite 350
St. Paul, Minnesota 55101-2147

**Re: CenterPoint Energy 's Request for Change in Demand Units
Docket No. G008/M-13-_____**

Dear Dr. Haar:

Pursuant to Minnesota Rule part 7825.2910, Subpart 2, CenterPoint Energy ("CPE" or the "Company") submits a Request for a Change in Demand Units (Request). CenterPoint Energy requests approval to implement its changes effective November 1, 2013. This change does not reflect the 2012-13 NNG Base/Variable split or the final Reservation Fee cost estimate. Updates will be noted in supplemental filings.

CenterPoint Energy expects to increase overall demand costs on November 1 by \$0.00028 per therm from June 1, 2013 rates. The annual effect on a residential heating customer using 922 therms (2008 Rate Case residential use-per customer) is an increase of about \$0.26. The increase is primarily due to small additions of entitlement acquired in the Willmar Open Season and the zeroing-out of the off system and capacity release credits currently in effect.

CenterPoint Energy has designated information in this document trade secret. Specifically Exhibit A, pages 1 and 2; Exhibit B, page 4. The information meets the definition of trade secret in Minn. Stat. 13.37 subd.1(b) as follows: (1) the information was supplied by CenterPoint Energy, the affected organization; (2) CenterPoint Energy has taken all reasonable efforts to maintain the secrecy of the information, including protecting it from disclosure in this document; and (3) the protected information contains gas supply contract information which derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use.

The attached pages detail the implementation of CenterPoint Energy's 2012-2013 Heating Season Supply Plan. Feel free to contact me at (612) 321-5078 if you have any questions.

Sincerely,

/s/

Marie M. Doyle

**7825.2910, Subpart 3. NOTICE OF
REPORT AVAILABILITY – Service List
Docket No. G-008/GR-05-1380 &
Docket No. G-008/GR-08-1075 (8/27/09)**

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SUMMARY OF MISCELLANEOUS TARIFF FILING
Minn. Rule part 7829.1300, Subp. 1

CenterPoint Energy

Filing Upon a Change in Demand
Minn. Rule part 7829.1300, Subp. 2

A filing for a change in demand is required when there is an increase or decrease in demand, a redistribution of demand percentages among classes, or if one form of demand is exchanged for another. CenterPoint Energy will increase overall demand costs on November 1, by \$0.00028 per therm from June 1, 2013 rates due to small additions of entitlement acquired in the Willmar Open Season and the zeroing-out of the off system and capacity release credits currently in effect. The annual effect on a residential heating customer using 922 therms is an increase of about \$0.26 per year.

**Filing Upon a Change in Demand
Minn. Rule part 7829.1300, Subp. 2**

**CenterPoint Energy
November 2012**

7825.2910 FILING BY GAS UTILITIES

Subp.2. Filing upon a change in demand. Gas utilities shall file for a change in demand to increase or decrease demand, to redistribute demand percentages among classes, or to exchange one form of demand for another. A filing must contain:

A. A description of the factors contributing to the need for changing demand.

Pipeline Entitlement:

The Company added 2,625 additional entitlements for this winter season, with a corresponding increase of 1,740 DT in the summer. A one-year capacity release of 1,500 units expired, which is then added back to the company's entitlement portfolio.

CenterPoint Energy made small additions to its current transportation capabilities for the 2013-2014, the majority of them off of Northern Natural Gas' (NNG) Willmar branch line where capacity is tight and some growth is expected.

Detail: Willmar- 1,654 DT of 12 month service
Willmar - 811 DT – 5 month Winter only service
St John/Avon - 160 DT winter / 74 DT summer

The above locations are isolated from the rest of the Company's system and the only option for serving growth is through increased capacity on the upstream pipeline.

Retirement of the Minnesota Coon Rapids Peak Shaving Station

CenterPoint Energy has determined that its Coon Rapids Propane Peaking Plant should be retired. The Coon Rapids facility supplied propane-air at the Coon Rapids #1 TBS. It was built in the 1960's by Midwest Gas. The facility contained 12 – 30,000 gallon propane tanks in a nonstandard configuration capable of holding ~28,000 DT of energy, one propane vaporizer, one gas engine driven air compressor, and auxiliary equipment. The plant's peak-day capacity was estimated at about 9,200 DT per day. The plant was the last in order of plant dispatch. It was small and contained a significant amount of old manual and labor intensive equipment.

Additionally, the propane air plant is subject to National Fire Protection (NFPA 59) Code requirement and there are issues that must be addressed at the plant to keep it long-term. The Company estimated that \$600,000 to \$700,000 investment would be needed to reliably count on the Coon Rapids facility. Required investment included items such as new vaporizers, auxiliary equipment replacement, additional security and fire protection.

Because of our current CNP gas demand entitlement position, this facility is not required for supply purposes at the Coon Rapids location, which has sufficient capacity. CenterPoint

Energy retired the plant in June 2013. The Company is reviewing its options for disposing of the equipment and facilities.

SMS Service

The Company currently has a contract for SMS service on Northern Natural for 60,000 dekatherms/day of protection against out of balance charges. On October 31, 2013, 30,000 dekatherms, or half of the service, expires. Based on recent operating experiences, the Company has decided to not renew this level of service. The Company believes it can re-subscribe in the future if it determines that it needs additional SMS service.

B. The Utility's design-day demand by customer class and the change in design day demand, if any, necessitating the demand revision.

Design Day Model:

As described in our 2012 Demand Entitlement filing (Docket G008/M-12-864), CenterPoint Energy worked with Concentric Energy to develop a model that met the following criteria:

- Include more data observations
- Reflect more current customer behavior (use-per-customer)
- Incorporate non-linear relationship between daily demand and Heating Degree Days (HDD)
- Provide a Model with coefficients that are consistent with expectations, and are statistically significant

On April 30, 2012, in response to Ordering Point #3 in the Commission's February 28, 2012 Order for supplemental information in the Demand Entitlement Dockets G-008/M-07-561 and G-008/M-11-1078, CenterPoint Energy provided a refined model that incorporated Concentric's suggestions. Concentric's report provided extensive review of CenterPoint Energy's methodology, along with reviews of methods used by other similarly situated natural gas companies and an analysis of the strengths and weaknesses of different estimating methods.

CenterPoint Energy was required in the Commission's February 28, 2012 order (Dockets G-008/M-05-561 and G-008/M-11-1078) to provide evidence substantiating its design-day study methodology, which it did in last year's Demand Entitlement filing, Docket G-008/M-12-864. CenterPoint Energy believes this new modeling methodology, along with the report provided that was authored by Concentric addressed the concerns raised regarding CPE's Design Day model in the last several years' entitlement filings and met the requirements of the Order noted.

CenterPoint Energy updated the model for the upcoming winter by adding an additional heating season of daily data and dropping the oldest year.

CenterPoint Energy's Design Day Estimate for 2013-2014

	<u>Last Year</u> <u>2012-2013</u>	<u>2013-2014</u>
Requirements		
Calculated Design Day	1,280,000	1,288,000
Physical Reserve	<u>36,000</u>	<u>36,000</u>
Total Requirements	1,316,000	1,324,000
Supply		
Pipeline Entitlement	1,035,981	1,038,306
Underground Storage (UGS)	50,000	50,000
Liquefied Natural Gas(LNG)	72,000	72,000
Propane	<u>188,800</u>	<u>179,633</u>
Net Supply	1,346,781	1,339,939
Reserve Margin Range:		
Available Capacity Net Requirements	30,781	15,939
As a percentage of Total Requirements	2.3%	1.2%
Available including Physical Reserve	66,781	51,939
(Reserve / Design Day)	5.2%	4.0%

CenterPoint Energy's design-day forecasting dataset includes daily usage data from all winter days for the past six heating seasons (November 2007 – March 2013), includes the monthly count of firm customers, and includes both HDDs and the square of the HDDs as independent variables to account for the non-linear relationships between HDD and usage. The model estimates the expected Use-per-customer (UPC) at various levels of HDD. This model uses many observations, which reflect recent customer use patterns. There is a good fit, as the actual observations (high R² of .9753) and the coefficients are consistent with expectations and are statistically significant. (See exhibit B, pages 1 and 2 for model specifications and statistical test results.)

To account for the limited observations available at extremely cold temperatures, calculates the UPC level from the model at the upper level of the 95% confidence interval. This limits the likelihood of the actual UPC being above the estimate to a 2.5% chance, which CPE believes is necessary in Minnesota's cold climate. As shown in Exhibit B, page 1, CenterPoint Energy's estimated Design Day for the 2013-2014 heating season is 1,288,000, assuming 90 HDDs and a Firm customer count of 823,790.

Exhibit B, pages 1 - 5 details CenterPoint Energy's design day model, along with related data requested annually by the Department of Commerce (DOC) to complete its analysis.

Cost Estimates:

Exhibit A, Page 1 contains the Annual Demand Cost Calculation that the Company will make effective November 1, 2013, reflecting updated entitlement expense. Prior to implementation, CPE plans to update noted values when they become final.

Exhibit A, Page 2 shows the current (June 1, 2012) Annual Demand Cost Calculation, provided for comparison purposes as requested in previous demand filings.

Note: Exhibit A is trade secret because it contains details on contracted units and rates, and disclosure of this information would adversely affect our ability to negotiate future contracts with capacity suppliers. A public version is supplied in the public document that summarizes available capacity, removing detailed information that CenterPoint Energy considers to be trade secret.

C. A summary of the levels of winter versus summer usage for all customer classes.
12 months ended March 2013 (in Dekatherms) –

<u>Customer Class</u>	<u>Winter</u>	<u>Summer</u>	<u>Total</u>
Small Volume Firm	75,825,007	22,691,364	98,516,371
Large General Service	0	0	0
Small Vol. Dual Fuel	9,579,988	4,581,984	14,161,972
Large Vol. Dual Fuel	<u>7,008,275</u>	<u>10,853,558</u>	<u>17,861,833</u>
System Total	92,413,270	38,126,906	130,540,176
SV -Transport	2,095,088	189,108	2,284,196
LV -Transport	18,993,559	22,603,000	41,596,559

D. A description of design-day gas supply from all sources under the new level, allocation, or form of demand.

Exhibit A contains the detailed pipeline entitlements and other demand costs.

**Filing Upon a Change in Demand
Minn. Rule part 7829.1300, Subp. 2**

**CenterPoint Energy
Summary of Exhibits**

- Exhibit A * Annual Demand Cost Calculation - Proposed November 1, 2013
 * Annual Demand Cost Calculation - Effective June 1, 2013
- Exhibit B Additional Information Request from the Department of Commerce
Additional information pursuant to the Department's request to all utilities
concerning demand entitlement changes dated October 1, 1993.
- Design Day Study
 - Model Specification (page 1)
 - SAS Code and output screenshot (page 2)
- DOC Annual Data Requirements:
- Heating Degree Day data for the most recent 12 month period (page 3)
 - Historical and Projected Design Day and Peak Day requirements (page 3)
 - * Demand Profile (page 4)
 - Historic gas price change comparisons (page 5)
- Exhibit C Supporting Workpapers – none included in this filing
- Exhibit D Intervenor Notification Filing Requirements pursuant to Minnesota Rule
7825.2910, Subpart 3.

* Note: Trade Secret Information is excised from the public copy

SUMMARY OUTPUT

<i>Regression Statistics</i>	
Multiple R	0.987625216
R Square	0.975403568
Adjusted R Square	0.975349211
Standard Error	0.034946933
Observations	908

ANOVA

	<i>df</i>	<i>SS</i>	<i>MS</i>	<i>F</i>	<i>Significance F</i>
Regression	2	43.83075358	21.91537679	17944.4772	0
Residual	905	1.105265747	0.001221288		
Total	907	44.93601932			

	<i>Coefficients</i>	<i>Standard Error</i>	<i>t Stat</i>	<i>P-value</i>	<i>Lower 95%</i>	<i>Upper 95%</i>	<i>Lower 95.0%</i>	<i>Upper 95.0%</i>
Intercept	0.062227356	0.006515407	9.550800422	1.16458E-20	0.049440291	0.075014421	0.049440291	0.075014421
HDDs	0.012512271	0.000336724	37.15887115	2.8372E-184	0.011851421	0.013173121	0.011851421	0.013173121
HDDs^2	3.74805E-05	4.18231E-06	8.961678362	1.79502E-18	2.92724E-05	4.56887E-05	2.92724E-05	4.56887E-05

<u>Year</u>	<u>HDDs</u>	<u>Customer #</u>	<u>UPC @ DD</u>	<u>Volume @ DD</u>	<u>UPC @ 95% CI UL</u>	<u>Volume @ 95% CI UL</u>	<u>Diff</u>
2014	90	823,790	1.492	1,229,000	1.564	1,288,000	59,000
2015	90	829,462	1.492	1,238,000	1.564	1,297,000	59,000
2016	90	836,910	1.492	1,249,000	1.564	1,309,000	60,000
2017	90	844,445	1.492	1,260,000	1.564	1,321,000	61,000
2018	90	852,075	1.492	1,271,000	1.564	1,333,000	62,000

The REG Procedure
Model: MODEL1
Dependent Variable: UPC

Number of Observations Read 909
Number of Observations Used 908
Number of Observations with Missing Values 1

Analysis of Variance

Source	DF	Sum of Squares	Mean Square	F Value	Pr > F
Model	2	43.83075	21.91538	17944.5	<.0001
Error	905	1.10527	0.00122		
Corrected Total	907	44.93602			

Root MSE 0.03495 R-Square 0.9754
Dependent Mean 0.62554 Adj R-Sq 0.9753
Coeff Var 5.58666

Parameter Estimates

Variable	DF	Parameter Estimate	Standard Error	t Value	Pr > t
Intercept	1	0.06223	0.00652	9.55	<.0001
HDDs	1	0.01251	0.00033672	37.16	<.0001
HDDs2	1	0.00003748	0.00000418	8.96	<.0001

Obs	UPC	HDDs	HDDs2	p1	U95	STD_DEV
901	0.573	35.4	1253	0.55212	0.62077	0.034977
902	0.500	32.8	1076	0.51296	0.58161	0.034977
903	0.501	33.4	1116	0.52197	0.59061	0.034977
904	0.449	30.7	942	0.48166	0.55031	0.034978
905	0.405	27.9	778	0.44048	0.50913	0.034981
906	0.345	22.2	493	0.35848	0.42716	0.034997
907	0.342	22.4	502	0.36132	0.43000	0.034996
908	0.534	35.2	1239	0.54910	0.61774	0.034977
909	.	90.0	8100	1.49192	1.56376	0.036601

Calculation

UPC = 1.49

UPC 95% CI UL = 1.49 + (2 * .037) = 1.564 where 0.037 is Std Dev rounded

ADDITIONAL INFORMATION REQUEST FROM THE DOC

2. Provide Heating Degree Day (HDD) data for the most recent 12 month period, ending March 31 or October 30.

		<u>Peak Season (Nov-Mar)</u>	<u>Off Peak (Apr-Oct)</u>	<u>Total Actual</u>
Total Heating Degree Day (April 2012 - March 2013)	Actual	6,035	1,224	7,259
	Normal (20 yr) (1993-2012)	5,978	1,404	7,382
Total Annual Firm Sales (In Dekatherms (April 2012 - March 2013))				98,516,371
Average Annual Firm Customers (April 2012 - March 2013)				808,322
Use per Firm Customer				121.9
Projected Peak Day HDD (Typical) (-12 degrees F.)				77
Projected Design Day HDD (-25 degrees F.)				90

3. **Historical and Projected Design Day and Peak Day Requirements**

Heating Season	Firm Customers (January)	Design Day Dekatherms	Total Requirements plus Peak Shaving	Firm Peak Day Sendout
2013/2014	823,790	1,288,000	1,339,939	na
2012/2013	813,605	1,280,000	1,346,781	961,134
2011/2012	807,922	1,216,000	1,379,681	830,444
2010/2011	804,703	1,213,000	1,369,481	872,772
2009/2010	801,286	1,211,000	1,329,481	893,925

P = projected

	{1}	{2}	{3}	{4}	{5}	{6}	{7}	{8}	{7}	
	10-1162 (Dec. 2010)	11-1078(Dec 2011)	11-1078(April 2012)	FILED AUG 12 12-864(Nov 2012)	UPDATE 12-864(Nov 2012)	UPDATE 12-864(DEC 2012)	UPDATE 12-864(Jan 2013)	FILED JULY 13 13-xxx(Nov 2013)	TOTAL Change	
2007-08 Heating Season Services	Quantity (Dkt)	Quantity (Dkt)	Quantity (Dkt)	Quantity (Dkt)	Quantity (Dkt)	Quantity (Dkt)	Quantity (Dkt)	Quantity (Dkt)		
	[TRADE SECRET DATA BEGINS...]								{(6)}-{(5)}	
NNG TF-12 Base Winter										
NNG TF-12 Base Summer										
NNG TF-12 Variable Winter										
NNG TF-12 Variable Summer										
NNG TF-12 -Growth-Winter										
NNG TF-12 Growth Summer										
NNG TF-5										
NNG TF-5 Growth										
TFX-5 mo (non-discounted)										
TFX-12 mo (non-discounted)										
TFX-A1-winter										
TFX-A1-summer										
TFX-A2-winter										
TFX-A2-summer										
TFX-B1-winter										
TFX-B1-summer										
TFX-B2-winter										
TFX-B2-summer										
TFX-C1-winter										
TFX-C1-summer										
TFX-C2-winter										
TFX-C2-summer										
	2/									
								...TRADE SECRET DATA ENDS]		
Total NNG Demand Winter	979,172	979,172	979,172	979,172	979,172	979,032	978,872	981,497	2,625	
Total NNG Demand Summer	551,883	551,883	551,883	551,883	551,883	551,673	551,673	553,413	1,740	
	[TRADE SECRET DATA BEGINS									
Reservation - Waterville (151 days)										
Waterville - SBA										
SMS										
Viking										
FT-A - 12 month										
FT-A - 5 month (5,000 5 mo.)										
								...TRADE SECRET DATA ENDS]		
Total Viking Demand	76,809	76,809	76,809	56,809	56,809	56,809	56,809	56,809	0	
Supply Demand	1/									
	[TRADE SECRET DATA BEGINS									
Seasonal Reservation										
Storage NGPL										
Storage Tennaska										
								...TRADE SECRET DATA ENDS]		
	NOTE: Reflects Total volumes contracted and does not reflect any cost allocation.									
Released Capacity				0	0	(1,500)	(1,500)	(1,500)	0	1,500
Underground Storage	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	0
LNG Peak Shaving	72,000	72,000	72,000	72,000	72,000	72,000	72,000	72,000	72,000	0
Propane Peak Shaving	201,700	201,700	201,700	188,800	188,800	188,800	188,800	188,800	179,633	(9,167)
Total Peaking	323,700	323,700	323,700	310,800	310,800	310,800	310,800	301,633		(9,167)
Total Capacity	1,379,481	1,379,481	1,379,681	1,346,781	1,345,281	1,345,141	1,344,981	1,339,939		(5,042)
Total Peak-Shaving Capacity/On-line Storage	323,700	323,700	323,700	310,800	310,800	310,800	310,800	301,633		(9,167)
Total Annual Transportation	608,692	608,692	608,692	608,692	608,692	608,556	608,482	610,222		1,740
Total Seasonal Transportation	1,055,981	1,055,981	1,055,981	1,035,981	1,034,481	1,034,267	1,034,181	1,038,306		4,125
Peak Shaving as % of Total Capacity	23.5%	23.5%	23.5%	23.1%	23.1%	23.1%	23.1%	22.5%		
Annual Transportation as % of Total Capacity	44.1%	44.1%	44.1%	45.2%	45.2%	45.2%	45.2%	45.5%		
Seasonal Transportation as % of Total Capacity	76.5%	76.5%	76.5%	76.9%	76.9%	76.9%	76.9%	77.5%		
Annual and Seasonal Transportation as % of Total Transportation	63.4%	63.4%	63.4%	63.0%	63.0%	63.0%	63.0%	63.0%		

	Last Rate Case (G008/GR-08- 1075)	Last Demand Change (G008/M-12- 864) (Dec 2012)	July 2013 PGA	November 2013 PGA with Proposed Demand Entitlement Change (G- 008/M-13-xxx)	Change From Last Rate Case	Change From Last Demand Change	Percent Change (%) From Most Recent PGA	Change (\$) From Most Recent PGA
Residential								
Commodity Cost of Gas (WACOG)	\$6.0690	\$3.9277	\$3.8208	\$3.8208	-37.04%	-2.72%	0.00%	\$0.0000
Demand Cost of Gas (1)	\$0.8401	\$0.7411	\$0.7483	\$0.7511	-10.59%	1.35%	0.37%	\$0.0028
Commodity Margin (2)	\$1.6637	\$1.7344	\$1.8075	\$1.8075	8.64%	4.21%	0.00%	\$0.0000
Total Cost of Gas	\$8.5728	\$6.4032	\$6.3766	\$6.3794	-25.59%	-0.37%	0.04%	\$0.0028
Average Annual Usage (Dk)	100	100	100	100				
Average Annual Total Cost of Gas	\$857.28	\$640.32	\$637.66	\$637.94	-25.59%	-0.37%	0.04%	\$0.28
Average Annual Total Demand Cost of Gas								\$0.28

	Last Rate Case (G008/GR-08- 1075)	Last Demand Change (G008/M-12- 864) (Dec 2012)	July 2013 PGA	PGA with Proposed Demand Entitlement Change (G- 008/M-13-xxx)	Change From Last Rate Case	Change From Last Demand Change	Percent Change (%) From Most Recent PGA	Change (\$) From Most Recent PGA
Commercial/Industrial Firm - A								
Commodity Cost of Gas (WACOG)	\$6.0690	\$3.9277	\$3.8208	\$3.8208	-37.04%	-2.72%	0.00%	\$0.0000
Demand Cost of Gas (1)	\$0.8401	\$0.7411	\$0.7483	\$0.7511	-10.59%	1.35%	0.37%	\$0.0028
Commodity Margin	\$1.4680	\$1.5700	\$1.6926	\$1.6926	15.30%	7.81%	0.00%	\$0.0000
Total Cost of Gas	\$8.3771	\$6.2388	\$6.2617	\$6.2645	-25.22%	0.41%	0.04%	\$0.0028
Average Annual Usage (Dk)	80	80	80	80				
Average Annual Total Cost of Gas	\$670.17	\$499.10	\$500.94	\$501.16	-25.22%	0.41%	0.04%	\$0.22
Average Annual Total Demand Cost of Gas								\$0.22

	Last Rate Case (G008/GR-08- 1075)	Last Demand Change (G008/M-12- 864) (Dec 2012)	July 2013 PGA	PGA with Proposed Demand Entitlement Change (G- 008/M-13-xxx)	Change From Last Rate Case	Change From Last Demand Change	Percent Change (%) From Most Recent PGA	Change (\$) From Most Recent PGA
Commercial/Industrial Firm - B								
Commodity Cost of Gas (WACOG)	\$6.0690	\$3.9277	\$3.8208	\$3.8208	-37.04%	-2.72%	0.00%	\$0.0000
Demand Cost of Gas (1)	\$0.8401	\$0.7411	\$0.7483	\$0.7511	-10.59%	1.35%	0.37%	\$0.0028
Commodity Margin	\$1.4422	\$1.4090	\$1.4861	\$1.4861	3.04%	5.47%	0.00%	\$0.0000
Total Cost of Gas	\$8.3513	\$6.0778	\$6.0552	\$6.0580	-27.46%	-0.33%	0.05%	\$0.0028
Average Annual Usage (Dk)	2,860	2,860	2,860	2,860				
Average Annual Total Cost of Gas	\$23,884.72	\$17,382.51	\$17,317.87	\$17,325.88	-27.46%	-0.33%	0.05%	\$8.01
Average Annual Total Demand Cost of Gas								\$8.01

	Last Rate Case (G008/GR-08- 1075)	Last Demand Change (G008/M-12- 864) (Dec 2012)	July 2013 PGA	PGA with Proposed Demand Entitlement Change (G- 008/M-13-xxx)	Change From Last Rate Case	Change From Last Demand Change	Percent Change (%) From Most Recent PGA	Change (\$) From Most Recent PGA
Commercial/Industrial Firm - C								
Commodity Cost of Gas (WACOG)	\$6.0690	\$3.9277	\$3.8208	\$3.8208	-37.04%	-2.72%	0.00%	\$0.0000
Demand Cost of Gas (1)	\$0.8401	\$0.7411	\$0.7483	\$0.7511	-10.59%	1.35%	0.37%	\$0.0028
Commodity Margin	\$1.3362	\$1.3114	\$1.3465	\$1.3465	0.77%	2.68%	0.00%	\$0.0000
Total Cost of Gas	\$8.2453	\$5.9802	\$5.9156	\$5.9184	-28.22%	-1.03%	0.05%	\$0.0028
Average Annual Usage (Dk)	14,300	14,300	14,300	14,300				
Average Annual Total Cost of Gas	\$117,907.79	\$85,516.86	\$84,593.08	\$84,633.12	-28.22%	-1.03%	0.05%	\$40.04
Average Annual Total Demand Cost of Gas								\$40.04

Summary	Commodity Change (\$/Dk)	Commodity Change (Percent)	Demand Change (\$/Dk)	Demand Change (Percent)	Total Change (\$/Dk)	Total Change (Percent)
Change from most recent PGA						
Residential	\$0.0000	0.00%	\$0.0028	0.37%	\$0.28	0.04%
Commercial/Industrial Firm A	\$0.0000	0.00%	\$0.0028	0.37%	\$0.22	0.04%
Commercial/Industrial Firm B	\$0.0000	0.00%	\$0.0028	0.37%	\$8.01	0.05%
Commercial/Industrial Firm C	\$0.0000	0.00%	\$0.0028	0.37%	\$40.04	0.05%

(1) Does not include Demand Smoothing

(2) Reflects Decoupling Factor and CIPR. Does not reflect IBR Adjustment, GAP or GCR Factors.

EXHIBIT D

July 1, 2013

Re: CenterPoint Energy's Request for Change in Demand Units

PLEASE TAKE NOTICE that on July 1, 2013, CenterPoint Energy filed its request for Change in Demand Units to be effective November 1, 2013 with the Minnesota Public Utilities Commission (MPUC). True and correct copies will be on file at the Commission offices (Metro Square, Suite 350, 121 7th Place East, St. Paul, Minnesota, 55101-2147) during regular business hours or from CenterPoint Energy by contacting Marie Doyle.

This Notice is required per MPUC Rule part 7825.2910, Subpart 3. Service list consists of interveners in the Company's previous two general rate cases.

If you have any questions, please contact Marie Doyle at (612) 321-5078.

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