

November 27, 2024

PUBLIC DOCUMENT

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

RE: **PUBLIC** Comments of the Minnesota Department of
Commerce Docket Nos. G999/CI-21-135 and G008/M-21-138

Dear Mr. Seuffert:

Attached are the **PUBLIC** comments of the Minnesota Department of Commerce (Department) in the following matter:

*In the Matter of a Commission Investigation into the Impact of Severe Weather in
February 2021 on Impacted Minnesota Natural Gas Utilities and Customers*

*In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery
Process for Cost Impacts Due to February Extreme Gas Market Conditions*

The annual compliance filing for 2024 was filed by CenterPoint Energy of Minnesota on August 1, 2024.

The Department recommends the Minnesota Public Utilities Commission **accept and approve** CenterPoint's 2024 annual compliance filing and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Peter Wyckoff, Ph.D.
Deputy Commissioner, Division of Energy Resources

JK/ar
Attachment



Before the Minnesota Public Utilities Commission

PUBLIC Comments of the Minnesota Department of Commerce

Docket Nos. G999/CI-21-135 and G008/M-21-138

I. INTRODUCTION

The Minnesota Department of Commerce, Energy Division (Department) appreciates the opportunity to provide comments on CenterPoint Energy of Minnesota's (CenterPoint, CPE, the Company) annual compliance filing submitted August 1, 2024, for these two dockets. These two dockets can be thought of as two aspects of the Commission's response to the costs associated with the February 2021 Pricing Event (PE). Docket no. G008/M-21-138 focused on the recovery of the costs resulting from the February 2021 Pricing Event. Docket no. G999/CI-21-135 was more concerned with CenterPoint's efforts to improve its ability to mitigate the risk of price spikes on a forward-looking basis.¹

CenterPoint's 2024 annual compliance filing (ACF) introduced a new twist into the 2024 ACF. Natural gas wholesale prices spiked on January 13th through the 16th 2024 (January 2024 Pricing Event). The Company estimated its January weighted cost of gas to be \$3.81/Dth in its January 2024 Purchase Gas Adjustment filing. CenterPoint paid on average \$36.50/Dth for daily spot gas at two main trading points between January 13th and 16th.² That average higher cost of gas was 9.6 times higher than the Company's monthly PGA estimate. This event triggered a reporting requirement that was included in the Commission's February 17th, 2023, Order.³ CenterPoint made that filing on January 26, 2024.

The Commission identified several reporting requirements to be included in each ACF. For clarity, the Department separated those reporting requirements two timeframes, short-term (up to 5 years) and long-term (beyond 5 years). The Department then further divided those reporting requirements into those related to the supply and those related to the demand of natural gas respectively for the different time periods.

¹ The Commission requirement for annual compliance filings for these two dockets was included in its ORDER REQUIRING ACTIONS TO MITIGATE IMPACTS FROM FUTURE NATURAL GAS PRICES SPIKE, SETTING FILING REQUIREMENTS AND INITIATING A PROCEEDING TO ESTABLISH GAS RESOURCE PLANNING REQUIREMENTS, issued February 17, 2023, at Order pt. 15 (February 17th Order).

² 2024 CPE Compliance filing, January 26, 2024, at p 2. (2024 Compliance)

³ Ibid at Order Pt. 3. If a gas utility in this docket pays prices on the daily spot market that exceed five times the average price of gas in the utility's filed purchased-gas adjustment for the current month when the gas was purchased, the utility shall make a filing to the Commission within 14 days identifying: A. Its costs for procuring gas for Minnesota customers while gas prices were inflated above this amount, B. What actions the utility took to account for or mitigate those costs, and C. Justifications for why its actions were prudent.

The short-term supply related reporting requirements are primarily focused on the review of operational changes to the gas supply function that could provide ratepayers with better protection against short-term price spikes.⁴ The topics included are: 1) Participation in the North American Energy Standards Board (NAESB) Gas/Electric Harmonization Forum to pursue beneficial reforms to NAESB's standard gas purchase contract, particularly in regards to the force majeure language; 2) Availability and cost of contracting, hedging, and supply options to mitigate the risk of short-term price spikes; 3) Utilization of baseload purchases; 4) Optimization of Company-owned and third-party storage facilities 5) Optimization of peak shaving facilities; and 6) Efforts to improve the Company's Supply Reserve Margin. The short-term demand-related reporting requirements include: 1) Development of interruptible tariffs that contain an economic curtailment provision; and 2) Research and development concerning voluntary conservation efforts directed at the public.⁵

The Commission didn't identify any long-term supply or demand reporting requirements. Rather, the Commission initiated a Gas Integrated Resource Plan process that combined long term supply and demand issues.⁶

Regarding the questions included in the Commission's Notice of Comment in this proceeding, they include the following:

- Does the natural gas utilities annual compliance filings comply with the Commission's Orders?
- Should the compliance filings be accepted and approved?
- Should the Commission make any changes to future compliance filing requirements?
- Are there other issues or concerns related to this matter?

II. PROCEDURAL BACKGROUND⁷

February 12 through 22, 2021	A combination of significant disruptions in natural gas supply combined with a sharp rise in natural gas demand, led to an extraordinary increase in natural gas spot market prices in Minnesota. The effects of the price spike were amplified by the closure of the wholesale natural gas markets for the three-day Presidents Day holiday weekend.
February 19, 2021	CenterPoint filed a letter with the Commission in Docket No. G008/M-21-138 noting the severity of its gas cost under-recovery and indicating a

⁴ Ibid at Order Pts. 4, 5, 6, 7, 8, 11, 12, and 14.

⁵ Ibid at Order Pt. 2 and 11.

⁶ Ibid at Order Pt. 16.

⁷ Attachment 1 provides a more detailed procedural background for this proceeding. The Department truncated this section of its comments for editorial purposes. This proceeding has been active for three and a half years and included a contested case hearing with four utilities and numerous interested parties participating. A complete table delineating the procedural background would take several pages.

Analyst assigned: John Kundert

	concern that the existing Annual Automatic Adjustment (AAA) might be inadequate to address an under-recovery of this magnitude.
February 23, 2021	The Commission held a Planning Meeting regarding the PE and authorized an investigation into the Pricing Event in Docket No. G999/CI-21-135.
March 2, 2021	The Commission issued an Order Opening Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers in Docket No. G999/CI-21-135.
March 10, 2021	The Commission issued a request for initial filings and notice of comments period with an initial date of April 9, 2021, in Docket No. G008/M-21-135.
March 16, 2021	CenterPoint filed a Petition for Recovery of Cost due to Extreme Gas Market Conditions in Docket No. G003/M-21-138. CPE stated that it had incurred approximately \$500 million in gas costs during the February 2021 Pricing Event (PE) and requested a variance from the existing Annual Automatic Adjustment (AAA) true-up mechanism.
March 22 through July 19, 2021	The Commission solicited comments from affected utilities and interested parties on the procedural, cost-recovery and policy issues identified in the wake of the February 2021 PE.
August 30, 2024	The Commission issued its ORDER GRANTING VARIANCES AND AUTHORIZING MODIFIED COST RECOVERY SUBJECT TO PRUDENCE REVIEW, AND NOTICE OF AND ORDER FOR HEARING.
September 20, 2021, through May 24, 2022	The Office of Administrative Hearings (OAH) held a contested case hearing on the issue and provided its report on findings of fact, conclusions of law and recommendation.
October 19, 2022	The Commission issued its ORDER DISALLOWING CERTAIN NATURAL GAS COSTS AND REQUIRING FURTHER ACTION.
February 17, 2023	The Commission issued its ORDER REQUIRING ACTIONS TO MITIGATE IMPACTS From FUTURE NATURAL GAS PRICE SPIKES, SETTING FILING REQUIREMENTS, AND INITIATING A PROCEEDING TO ESTABLISH GAS RESOURCE PLANNING REQUIREMENTS.
August 1, 2023, through July 30, 2024	CPE filed 2023 Annual Compliance Filing (ACF). The Department provided comments on that filing. The Commission issued an order accepting and approving the 2023 ACF.
January 26, 2024 August 2024	CPE filed compliance on cost impacts due to extreme market conditions. CPE filed its 2024 Annual Compliance Filing (ACF). Commission issued a notice of comment period for CenterPoint's 2024 ACF.

III. DEPARTMENT ANALYSIS

The Department's analysis begins with its responses to the Commission's questions included in its Notice of Comment (NOC) Period in these proceedings dated August 29, 2024. Next, the Department summarizes CenterPoint's Customer Protection Plan (CPP). This filing discussed the Company's plans for modifying its internal processes to mitigate short-term price spikes.⁸ The Department reconciles the information in the Company's 2024 ACF with the ACF reporting requirements included in the Commission February 17, 2023 Order. The Department then develops an analysis to review CenterPoint's efforts to mitigate the short-term pricing risk resulting from the January 2024 PE relative to the Company's response during the February 2021 PE.

A. RESPONSES TO COMMISSION'S QUESTIONS

The Department provides its responses to the Commission's questions follow in the order presented in the NOC.

A.1. Does the natural gas utilities annual compliance filings comply with the Commission's Orders?

The Department believes that CenterPoint's 2024 Annual Compliance Filing (ACF) complies with the Commission's Orders related to this proceeding.

A.2. Should the compliance filings be accepted and approved?

The Department recommends the Commission accept and approve CenterPoint's 2024 ACF.

A.3. Should the Commission make any changes to future compliance filing requirements?

The Department did not identify any changes that it recommends the Commission implement regarding future compliance filing requirements?

A.4. Are there other issues or concerns related to this matter?

The Department did not identify any issues or concerns at this time.

B. SUMMARY OF CPE'S CUSTOMER PROTECTION PLAN

During its review of the prudence of the four utilities seeking the recovery of extraordinary gas costs in August 2022, the Commission required the gas utilities to file a plan that addressed the question of how

⁸ The CPP was filed on September 15, 2022, in this proceeding.

those same utilities were modifying their practices to protect ratepayers from future extraordinary gas prices spikes.⁹

The Company filed its Customer Protection Plan (CCP) on September 15, 2022. CenterPoint separated its efforts into modifications implemented since the February 2021 Market Event and future modifications.

B.1. Modifications Implemented Since the February 2021 Market Event

The Company identified two sub-categories under this topic – procurement practices and customer communications.

B.1.1. Procurement practices

As the term suggests, procurement practices focus on contract-related supply options which include baseload purchases, swing supply and daily purchases.¹⁰

Prior to the February 2021 Market Event, CenterPoint purchased a fair amount of natural gas using daily contracts. The Company explained its reasoning for using daily contracts in its 2020-2021 Gas Procurement Plan (CPP):

Buying supplies based on a daily index basis or fixed daily price basis involves some risk that gas prices can spike to high levels when certain conditions exist in the market, such as the extreme long lasting cold spells incurred during the winter of 2013-2014 or the short, extreme fly-up that occurred in December 2017. CenterPoint still believes that the probability of occurrence for this risk is low and that those situations were an anomaly. The previous ten years of experience showed that buying swing gas subject to daily pricing was the most economical way to purchase this gas when considering the fixed costs associated with other methods of pricing.¹¹

The February 2021 PE upended CenterPoint's estimates of the probability of the risk associated with short-term price spikes. Prices for daily gas during that event dwarfed all historical prices.

⁹ See Commission Notice of Comments issued August 23, 2022, in Docket Nos. G999/CI-21-135, G008/M-21-138, G004/M-21-235, G002/CI-21-610 and G011/CI-21-611.

¹⁰ Baseload purchases are defined as fixed quantities of gas purchased for a monthly or longer term. A baseload contract provides a utility with a consistent volume of gas every day. The price of the gas purchases uses a first of month (FOM) index or a fixed price, so that type of agreement provides a fixed quantity and a higher level of price certainty than swing or daily contracts. The price of daily swing subject to daily pricing gas is determined by the average of those daily prices. This contract type represents the riskiest of those discussed.

¹¹ CenterPoint Minnesota 2020 Gas Procurement Plan filed June 19, 2020, in Docket No. G008/M-19-699 at p 51.

The Company did adjust its practices after this new price information became a reality. For example, CPE noted that it had increased baseload First-of-Month (FOM) index purchases for the 2022-2023 heating season by 33% relative to the 2021-2022 heating season. This resulted in an increase of 5.9% in the total winter plan met by FOM index purchases.

CenterPoint also increased the amount of hedged baseload it purchases.¹² The Company increased its baseload hedges 13% over the hedged volumes in the 2020-2021 heating season.

In that same document, CenterPoint identified six additional modifications it was implementing in the 2022-2023 plan. They included: 1) Continued increase in FOM index purchases; 2) Continued increase in baseload hedges; 3) Increased supply diversity; 4) Hedging optimization; 5) Increasing the diversity of hedges by adding hedged baseload at Demarc; and 6) Executing longer-term hedges.

B.1.2. Customer communications

CenterPoint identified three projects related to this topic. They included: 1) Heating season cold weather communications campaign; 2) Conservation Improvement Program (CIP) campaign; and 3) Business customer engagement. The Company also noted that it had not issued public requests for customers to voluntarily, immediately and temporarily reduce their natural gas use for economic reasons. CPE prefers to preserve that demand-response option for emergency gas supply situations.

These modified practices formed the basis for the Annual Compliance filing reporting requirements in the Commission's February 17, 2023 Order.

B.2. Future Proposed Modifications as of September 2022

The Company separated this topic into two sub-topics – short-term future modifications and longer-term modifications.

B.2.1. Short-term future modifications

CenterPoint, along with the other three natural gas LDCs that are included in docket 21-135 filed a joint proposal as part of this proceeding that requested the Commission approve a plan the Joint Utilities had developed regarding the economic dispatch of natural gas from; 1) underground storage; 2) peak shaving facilities; and 3) interruptible curtailments.

¹² Hedged baseload is CenterPoint specific term for a bundled product that includes a supply contract and an embedded financial instrument, like a call option that introduces an element of financial hedging in that the gas is delivered at a fixed price.

The Commission didn't approve the Joint Utilities proposal.¹³ Hence, the Department will not address the details of the Joint Utilities proposal.

B.2.2. Long-term modifications

The Company identified the following categories for this topic: 1) Storage; 2) Peak shaving; 3) Interruptible curtailments; 4) Gas supply contracting; 5) Gas supply diversity and purchasing; 6) Hedging, and; 7) Demand response programs. CenterPoint also noted that these changes as not being implemented until 2023-2024 or later.

Regarding storage, CPE identified two potential modifications to its Waterville Minnesota underground storage facility. First among those would be constructing additional capacity on NNG that would allow the Company to increase its maximum daily withdrawal from the facility to 55,000 Dth/day from the then current 50,000 Dth/day. A second modification encompasses increasing the capacity and withdrawal capability of the facility. The Company's initial assessment of this modification suggested that it could increase the size of the facility by 600,000 Dths from the then current 2,000,000 Dths to 2,600,000 Dths. CenterPoint also identified a third storage modification that being contracting for additional pipeline storage and pipeline capacity.

The Company also identified several modifications to its peak shaving facilities as part of this effort.¹⁴ CenterPoint is studying the feasibility of increasing the daily vaporization output of its Liquefied Natural Gas (LNG) facilities from 72,000 Dth/day to 90,000 Dth/day. In addition, the Company is studying the possibility of modifying the LNG liquefaction system to allow for refilling of LNG storage during the winter months.

Under interruptible curtailment, the Company noted that it could develop a new option within its existing interruptible service offering that would allow CPE to economically curtail interruptible customers.

¹³ *In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions*, CenterPoint Energy Minnesota Gas, Order – Requiring Actions to Mitigate Impacts from Future Natural Gas Price Spikes, Setting Filing Requirements, and Initiation a Proceeding to Establish Gas Resource Planning Requirements, February 17, 2023, Docket No. G008/M-21-138, (eDockets) [20232-193249-01](#), at 23 (hereinafter “February 17, 2023, Order”).

¹⁴ CenterPoint maintains Company-owned propane-air peaking plants that are used to provide short-term supply that can be dispatched to maintain system reliability locally or across the Company's Minnesota service area. These propane facilities can provide 149,00 Dth./day of gas. CenterPoint also has a liquefied natural gas (LNG) facility which can delivery 72,000 Dth/day.

B.3. Investing in Local Supply, Energy Efficiency, and Carbon-Free Resources

The Company referenced its Natural Gas Innovation Act (NGIA) filing that CenterPoint submitted on June 28, 2023.

B.4. Natural Gas Integrated Resource Planning (Gas IRP)

The Company discussed Gas IRP in some detail. Given the amount of attention the Commission has given this process over the last year or two, the Department doesn't see much value in summarizing CenterPoint's discussion of this topic.

C. UPDATE ON CENTERPOINT'S EFFORTS TO MITIGATE THE RISK OF SHORT-TERM NATURAL GAS PRICE SPIKES

The Department reconciles the Commission's ACF reporting requirements with the information the Company included in its 2024 ACF. The Department then reviews the Company's performance during the January 2024 Pricing Event to determine if CPE's modifications to lower ratepayers' risk from short-term price spikes has been successful.

C.1. Procurement Practices

The Department's review is summarized in Tables 1 and 2. Table 1 (following page) compares CPE's winter heating season procurement strategies for 2020-2021 and 2023-2024.

Consistent with that approach, CenterPoint increased its baseload index price contracts from 21.05 million dekatherms in 2020 to 26.7 million dekatherms in 2023, an increase of 27%. The amount of swing or spot gas purchased declined by 32% over that same time, which is also consistent with the concept of minimizing short-term price spike risk.¹⁵ CPE also increased its storage resources by 5% between 2020 and 2023. This change also worked in the direction of mitigating the risk of short-term price spikes. The amount of peak shaving forecasted for both years is minimal to non-existent in Table 1. Given peak shaving's role in the supply mix is helpful to provide capacity to avoid purchasing incremental pipeline transportation for peak needs but considering the high capital costs associated with the construction of a new peaking facility, it is not surprising that CPE hasn't pursued this option to a greater extent. Transportation capacity on interstate or in-state pipelines (gas purchased during the heating season using different contract terms) is also considered in this list.

¹⁵ CenterPoint is unique among rate regulated natural gas distribution companies in Minnesota in that it submits a Gas Procurement Plan (GPP) annually that details its plans for meeting its winter season demand. The information for Table 1 is taken from those filings that were made on June 16, 2020, and September 27, 2023, in Docket no. G008/M-19-699.

Table 1 – Comparison of CPE’s Winter Procurement Strategies for 2020-2021 and 2023-2024 Winter Heating Seasons¹⁶

Line No.	Purchases	2020-2021		2023-2024		Difference	
		Winter Plan		Winter Plan		Winter Plans	
		DTH	Percent	DTH	Percent	DTH	Percent
1.	Baseload/Hdgd	23,000,000	22.0%	26,000,000	25.1%	3,000,000	13%
2.	Baseload/FOM	21,050,000	20.2%	26,700,000	25.8%	5,650,000	27%
3.	Daily/Swing	33,339,302	32.0%	22,600,000	21.8%	(10,739,302)	-32%
4.	Storage	26,872,151	25.8%	28,200,000	27.3%	1,327,849	5%
5.	Peaking	75,123	0.1%	-	0.0%	(75,123)	-100%
6.	Total System Purchases	104,336,576	100%	103,500,000	100%	(836,576)	
7.	Transport	18,120,000		21,100,000		2,980,000	16%
8.	Total System Supply	122,456,576		124,600,000		2,143,424	2%
9.	Total Price Stabilization	49,947,274	47.9%	54,200,000	52.4%	4,252,726	9%

In summary, CPE increased the number of dekatherms covered by price stabilization by approximately 4.3 million or 9 percent between 2020-2021 and 2023-2024 heating seasons. Over that same period, the quantity of dekatherms forecasted to be purchased decreased 0.8% or approximately 800,000 Dekatherms.

Table 2 (following page) compares the 2023-2024 and 2024-2025 winter heating season plans.

Table 2 shows CenterPoint continuing to increase the supply of Baseload Index Priced contracts by 400,000 dekatherms in the 2024-2025 heating season, while decreasing the amount of supply it purchases using Daily/Swing Supply by 1.5 million dekatherms.¹⁷

CenterPoint also executed a contract with a new storage facility for the 2024-2025 winter heating season, that being Tenaska/East Cheyenne. This addition increased the Company’s Maximum Daily Withdrawal Quantity (MDWQ) to **[TRADE SECRET DATA HAS BEEN EXCISED]** Dth/day. The addition of this new underground storage contract resulted in CenterPoint being able to cover **[TRADE SECRET DATA HAS BEEN EXCISED]** of its design day from physical storage. The Company noted in its 2024 – 2025 Contract Demand Entitlement filing, docket no. G008/M-24-146 that storage has become more

¹⁶ The Department included the comparison of the 2020-2021 and 2023-2024 winter procurement strategies since the January 2024 Pricing Event occurred during that period.

¹⁷ The 1.1 million dekatherm decrease in total system purchases between 2023 and 2024 accounts for the balance of the change.

and more difficult to contract for in the past few years.¹⁸ This lack of the development of incremental physical storage for the Upper Midwest is concerning, particularly given that the third-party storage that CPE relies on is provided via multi-year contracts, which by their nature lapse periodically. Thus, the Company needs to evaluate and explore storage opportunities that would further stabilize the CPE's supply portfolio continually.

Table 2 – Comparison of CPE's Winter Procurement Strategies for 2023-2024 and 2024-2025 Winter Heating Seasons

		2023-2024		2024-2025		Difference	
		Winter Plan		Winter Plan		Winter Plans	
Line No.	Purchases	DTH	Percent	DTH	Percent	DTH	Percent
1.	Baseload/Hdgd	26,000,000	25.1%	26,000,000	25.4%	-	0%
2.	Baseload/FOM	26,700,000	25.8%	27,100,000	26.5%	400,000	1%
3.	Daily/Swing	22,600,000	21.8%	21,100,000	20.6%	(1,500,000)	-7%
4.	Storage	28,200,000	27.2%	28,200,000	27.5%	-	0%
5.	Peaking	-	0.0%	-	0.0%	-	NA
6.	Total System	103,500,000	100%	102,400,000	100%	(1,100,000)	-1%
7.	Transport	18,120,000		21,100,000		2,980,000	16%
8.	Total System	121,620,000		123,500,000		1,880,000	2%
9.	Total Price Stabilization	54,200,000	52.4%	54,200,000	52.9%	-	0%

CenterPoint also noted in its filing on January 26, 2024, that "inventories in CenterPoint's storage assets were at their highest withdrawal deliverability" prior to the January 2024 Pricing Event.¹⁹

Order Point 6 of the Commission's February 17, 2023, Order requires affected utilities to discuss plans to incorporate more baseload purchases. The Department concludes that CenterPoint has complied with that reporting requirement.

C.2. Update on Customer Communications

CenterPoint did update its parameters for curtailing its interruptible customers after the economic dispatch proposal it had supported in its CPP was not approve. The Company adopted the following parameters for curtailing its interruptible customers for economic reasons: 1) if the price exceeds 5

¹⁸ Docket No. G008/24-146, TRADE SECRET response to DER IR #5 which is included as **TRADE SECRET** Attachment 2.

¹⁹ 2024 Compliance filing at p 3.

times the monthly WACOG and if the price exceeds \$25/Dth, CenterPoint will initiate customer conservation calls.²⁰

C.3. Update on Long-term Modifications

C.3.1. Underground storage

Department Information Request (IR) no. 81 asked the Company several questions on this topic.²¹

CenterPoint's response discussed its continuing efforts to increase the capacity and deliverability of gas stored at its Waterville facility. None of those potential improvements had been implemented as of January 1, 2024, so they had no effect on the Company's response to the January 2024 Pricing Event. It does appear that one improvement will be implemented before the beginning of the 2025 winter season.

The Department notes CPE's efforts and concludes the Company complied with the reporting requirement in the Commission's February 17, 2023, Order at Order Point 7.

C.3.2. Peak shaving

The Company has apparently modified its peaking shaving dispatch policy or protocols noting in its 2023 GPP:

The Company will utilize its peaking facilities when the estimated daily demand is larger than pipeline capacity (even after curtailment), due to operational reasons, or when deemed prudent or necessary give the economic and situational context of the utility and market. When the load nears maximum contracted interstate pipeline capacity entitlements, CenterPoint will generally begin to curtail its sales service interruptible customers loads. If the load is projected to exceed contracted pipeline capacity after curtailments, or if the cold weather is forecast for a short duration such that curtailment is impractical, CenterPoint will begin calling on its LNG and propane peaking plants to address large daily variations in weather and customer demand. CenterPoint's peaking plants are not sized to serve as a significant hedging supply source, but rather can be called upon to help stabilize unknown price risk from price spike exposure during an unprecedented winter event.²²

²⁰ These are the same parameters the Commission adopted in Order Point 3 in its February 17th Order.

²¹ Attachment 3 includes a copy of Department IR no. 81 and CenterPoint's response.

²² CenterPoint Minnesota 2024 Gas Procurement Plan filed September 27, 2024, in Docket No. G008/M-23-360 at p 34.

This appears to be another instance in which CenterPoint has modified its procedural or protocols consistent with the Commission's directive in the February 17, 2023, Order.

The Department asked the Company four different sub-questions in Information Request (IR) no. 82 on the Company's efforts to update its LNG system.²³

CenterPoint's response discussed its continuing efforts to increase the deliverability of gas stored in its LNG system. None of those potential improvements had been implemented as of January 1, 2024, so they had no effect on the Company's response to the January 2024 Pricing Event.

The Department notes CenterPoint's efforts and concludes the Company complied with the reporting requirement in the Commission's February 17, 2023, Order at Order Points 12 and 14.

C.3.3. Interruptible curtailment

CenterPoint noted in its 2024 ACF that it filed economic curtailment tariffs in its most recent general rate case, Docket no. G008/GR-23-173.²⁴ Seth DeMerritt is the Company witness sponsoring those tariffs. His testimony included changes to include economic curtailment to the following existing interruptible tariffs: 1) Small Volume Dual Fuel Sales Service; 2) Small Volume Firm/Interruptible Sales Service; 3) Large Volume Dual Fuel Sales Service; 4) Large Volume Firm/Interruptible Sales Service, and; 5) Interruptible Agricultural Grain Dryer Sales Service.

Mr. DeMerritt is also sponsoring new interruptible tariffs for transportation customers that allow for economic curtailment. They include the following: 1) Small Volume Dual Fuel Transportation Service; 2) Large Volume Dual Fuel Transportation Service; and 3) Large Volume Dual Fuel Transportation Service. The proposed tariff provides a 10% reduction in base rates and exemption from any future additional surcharges that could result from a future price spike.

Department IR #86 asked how much additional load these tariffs represent in nominal and percentage terms?²⁵ CPE responded that it didn't project any additional interruptible load because of the economic curtailment tariffs. The Company estimated that 62% of its interruptible customers would participate in the economic curtailment option in the interruptible tariffs.

Department IR #85 asked if the Company is pursuing any other ideas for economic dispatch of Company-owned storage, or the Company's LNG peaking facility or interruptible customer loads after

²³ Attachment 4 includes a copy of Department IR no. 82 and CenterPoint's **TRADE SECRET** response.

²⁴ 2024 Annual Compliance Filing submitted August 1, 2024, at 1. (2024 ACF)

²⁵ Attachment 5 includes a copy of Department IR no. 86 and CenterPoint's response.

CPE's original proposal was not implemented.²⁶ CenterPoint explained that it had not determined parameters for those options and was not pursuing any other ideas for economic dispatch.

The Department concludes that CPE has complied with the Commission's requirement included in Order Point 2 of its February 17, 2023, Order.

C.3.4. Supply contracting, supplier diversity and purchasing and hedging

The Department elected to combine these three topics (supply contracting, supplier diversity and purchasing, and hedging updates) into one as they are closely connected. Department IR #80 asked about the Company's efforts regarding its supply mix diversity.²⁷ CenterPoint's response was thoughtful and thorough but didn't provide any new information. Market reforms falls under the supply contracting topic in CPE's CPP. The Department didn't issue an information request on this topic given that it has not been resolved and likely will not be soon.

Department IR #84 asked about CPE's efforts since 2021 regarding pipeline capacity contracts.²⁸ CenterPoint's trade secret response focused on its efforts negotiating with NNG in the Northern Lights capacity expansion process. The Company also noted that given NNG's higher cost structure, CPE is evaluating alternative solutions like Viking Gas Transmission and LNG facilities.

Department IR #83 asked about CPE's efforts regarding hedging.²⁹ The Company's response was helpful, particularly regarding the CenterPoint's efforts to increase the diversity of hedging products to include additional delivery points. The Company's response also referenced the Hedging Impact of Average Bills analysis that is included in CPE's Annual Automatic Adjustment Report which is filed annually.³⁰

Turning to the Supply Reserve Margin, this issue was initially discussed in the Direct Testimony of Matthew J. King from GDS Associates on behalf of the Department.³¹ Mr. King noted that it is typical practice for a gas utility to hold sufficient firm transportation rights and local resources to meet the utility's usage on the historically coldest day it has recorded and the corresponding forecasted demand on its distribution system. The difference between the supply and demand is defined as the Supply Reserve Margin. In its February 17, 2023, Order, the Commission included a requirement that utilities focus on improving their supply reserve margin efforts to minimize those quantities.

²⁶ Attachment 6 includes a copy of Department IR no. 85 and CenterPoint's response.

²⁷ Attachment 7 includes a copy of Department IR no. 80 and CenterPoint's response.

²⁸ Attachment 8 includes a copy of Department IR no. 84 and CenterPoint's **TRADE SECRET** response.

²⁹ Attachment 9 includes a copy of Department IR no. 83 and CenterPoint's response.

³⁰ See Docket No. G008/AA-24-299, at Exhibit 8.

³¹ Direct Testimony of Matthew J. King – Revised, Docket No. G002/CI-21-610, filed February 14, 2022, at p. 17.

CenterPoint staff have repeatedly discussed the Company's efforts to improve its demand forecasting for both sales and transportation customers over the past several years. Improving the accuracy of the demand forecast is the best avenue for improving the Company's Supply Reserve Margin. The Department appreciates CenterPoint's efforts in this regard.

The Department concludes that the Company has complied with this Order Points 5 and 8 in the Commission's February 17, 2023 Order.

C.3.5 Demand Response, NGIA and Natural Gas IRP Updates

The Department didn't identify any specific information regarding any of these three topics (demand response, NGIA and Natural Gas IRP Updates) in the Company's 2024 ACF. These efforts are normally longer-term in nature. The Department also neglected to send CPE discovery on this topic at least on the demand response topic. The Department requests CenterPoint included a discussion of its efforts to update its demand response efforts since 2021 in its reply comments. The NGIA projects that could affect gas supply like Renewable Natural Gas will require time to be identified and constructed and will likely not influence price mitigation for several years. The same could be said of any additional supply resources identified in the Gas IRP process.

D. COMPARISON OF CPE'S RESPONSES TO THE JANUARY 2024 AND FEBRUARY 2021 PRICING EVENTS

D.1. Gas Delivered During the January 2024 Pricing Event - Volumes and Prices

CenterPoint provided a preliminary estimate of total costs it incurred during the January 2024 four-day event. That amount was \$46,975,054.³² Table 3 (following page) summarizes the information CPE provided in its 2024 ACF.

The Department used **Trade Secret** information provided in this proceeding to estimate the percentages of total supply the Company had called upon during the four coldest days of the February 2021 Pricing Event.³³ The Department then replaced the actual percentage of the different supply options used in the January 2024 Pricing Event with those it had calculated for that four-day period during the February 2021 Pricing Event.

³² 2024 Compliance filing in Docket No. G002/M-21-138 at page 2.

³³ CenterPoint filing, March 15, 2021, **TRADE SECRET** Attachment A.

Table 3 – Summary of Volumes Delivered by Supply Type, Percentage of Supply, Average Cost and Total Cost January 2024 Pricing Event³⁴

Line No.	Description	Total Vols (Dths)	Percent of Total Supply	Avg. Price/Dth.	Total Cost
1.	Baseload - (FOM/Hedged)	1,799,483	39.2%	\$ 3.91	\$ 7,044,094
2.	Storage	1,640,595	35.7%	\$ 2.36	\$ 3,871,157
3.	Peaking -LNG	165,980	3.6%	\$ 3.07	\$ 509,691
4.	Peaking- Propane	16,460	0.4%	\$ 9.08	\$ 149,519
5.	Gas Daily Supply	969,861	21.1%	\$ 36.50	\$ 35,400,603
6.	Total Supply	4,592,379	100%	\$ 10.23	\$ 46,975,064

Table 4 contains this information. The percentages of supply calculated for the February 2021 Pricing Event are different from those for the January 2024 Pricing Event.

The percentage of supply provided by baseload gas increase from **[TRADE SECRET DATA HAS BEEN EXCISED]** in 2021 to 39.2% in 2024. The percentage of supply sourced from storage increased from **[TRADE SECRET DATA HAS BEEN EXCISED]** in 2021 to 35.7% in 2024. The percentage of supply derived from LNG went from **[TRADE SECRET DATA HAS BEEN EXCISED]** in 2021 to 3.6% in 2024 and the percentage for propane increased from **[TRADE SECRET DATA HAS BEEN EXCISED]** in 2021 to 0.4% in 2024. All those increases are consistent with CenterPoint’s efforts to mitigate the risk of short-term prices spikes.

Table 4 – TRADE SECRET Summary of Volumes Delivered by Supply Type, Average Cost and Total Cost Substituting Supply Percentages from February 2021 Pricing Event

Line No.	Description	Total Vols (Dths)	Percent of Total Supply	Avg. Price/Dth.	Total Cost
		[TRADE SECRET DATA HAS BEEN EXCISED]			
1.	Baseload - (FOM/Hedged)				
2.	Storage				
3.	Peaking/LNG				
4.	Peaking/Prop.				
5.	Daily Supply				
6.	Total Supply				

³⁴ 2024 Compliance at 2.

As for the percentage of supply provided by Daily Supply it went from **[TRADE SECRET DATA HAS BEEN EXCISED]** in 2021 to 21.1% in 2024. This movement away from the use of daily contracts is also consistent with the Company's efforts to mitigate the risks of short-term price spikes.

The comparison in **TRADE SECRET** Table 5 suggests that changes to CenterPoint's contracting practices and dispatch protocols for its gas contracting, storage and peaking facilities avoided approximately \$35 million in additional gas commodity costs during the January 2024 Pricing Event.

TRADE SECRET Table 5 – Difference in Volumes and Costs for the Two Pricing Events

Line No.	Description	Difference Vols	Total Cost - Actual	Total Cost - Using 2021 Info	Difference
		[TRADE SECRET DATA HAS BEEN EXCISED]			
1.	Baseload - (FOM/Hedged)				
2.	Storage				
3.	Peaking/LNG				
4.	Peaking/Prop.				
5.	Daily Supply				
6.	Total Supply				

The Department appreciates the Company's efforts in this regard.

D.2. Curtailment of Interruptible Customers and Voluntary Conservation Efforts

CenterPoint curtailed interruptible customers during February 2021 Pricing Event, although only for reliability-related issues. CPE estimated that it curtailed 123,666 Dth of usage between February 12 to 16.³⁵ That level of interruption equaled 29% of the Company's Actual Interruptible Load during the 4-day period.

CPE curtailed customers gas usage on January 15 and 16 during the January 2024 PE for certain customers. Some of the customers were curtailed for reliability-related reasons. Some customers were also interrupted for economic reasons.³⁶ In its response to Department IR no. 79, the Company noted that it had curtailed approximately 94,000 Dekatherms over the two-day period.³⁷ That level of interruption equaled 49% of the Company's Actual Interruptible Load during that period.

³⁵ CPE's supplemental response to OAG-RUD information request #118. A copy is included as Attachment 10.

³⁶ 2024 Compliance filing at p. 4.

³⁷ A copy of OAG-RUD IR #20 is included in Attachment 11.

CenterPoint appears to have curtailed an additional 20% more of its interruptible load during the January 2024 PE compared to the February 2021 PE. This suggests that CPE used curtailment more extensively during the January 2024 PE even though gas prices were not nearly as elevated during the February 2021 PE. Hence, the Department concludes that CPE had modified its curtailment protocol for interruptible customers such that the Company does curtail customers for economic reasons.

Turning to the topic of voluntary conservation, the Company did not institute a call for voluntary conservation during the February 2021 PE. However, CenterPoint did initiate a voluntary conservation call during the January 2024 PE. The Company contacted customers on January 10, 2024, of the upcoming cold snap and provided tips to save energy as well as payment assistance information. On January 12, 2024, CenterPoint sent a second email that requested that customers lower their thermostats. That message also included conservation and payment assistance information. The Company also included information on system use during the event and concluded that it could not identify a conclusion it could reach given the information available. CenterPoint plans to continue these efforts.

E. EXTRAORDINARY GAS COST COST-RECOVERY AND MISCELLANEOUS

E.1. Recovery of Extraordinary Gas Costs

The Department provided an update on the Company's efforts to recover the Extraordinary Gas Costs (EGCs) resulting from the February 2021 PE in its comments on CPE's 2023 ACF. The Department thought it wise to include a similar update for CPE's 2024 ACF. In Department IR #89 the Department asked about the status of the recovery of the \$372,418,366 of EGCs and how the actual rate of cost recovery is compared to what the Company had forecasted.³⁸

CenterPoint explained in its response that as of October 1, 2024, the EGUs were \$154,060,186 under-recovered. The Company had forecasted being \$146,105,479 under-recovered as of August 1, 2024. Thus, the EGC recovery effort has been hampered by warmer than normal weather and was roughly \$8.0 million under-recovered as of the end of November 2024 relative to its forecast.

The Department also asked if the Company would recover its Extraordinary Gas Costs by November 2026. CPE indicated that if the Company had an under-recovery position at the end of November 2026, the Company would incorporate the under-recovered amount into the next Annual Automatic Adjustment (AAA) filing in September of 2027, as ordered by the Commission in its October 19, 2022 Order.

³⁸ Attachment 12 contains a copy of Department IR #89 and CPE's response.

The Department has no concerns relative to this matter. CenterPoint's proposal appears to be consistent with the Commission's directions.

E.2. CenterPoint Requested Edits to Order Point No. 3

CenterPoint also requested two editorial changes to Order Point #3 included in the Commission's February 17, 2023, Order.³⁹ That order point reads as follows:

If a gas utility pays prices on the daily spot market that exceed five times the average price of gas in the utility's filed purchased-gas adjustment for the current month when the gas was purchased, the utility shall make a filing to the Commission within 14 days identifying: A. Its costs for procuring gas for Minnesota customers while gas prices were inflated above this amount, B. What actions the utility took to account for or mitigate those costs, and C. Justifications for why its actions were prudent.

CenterPoint is requesting the following changes:

If a gas utility pays prices on the daily spot market that exceed five times the average price of gas in the utility's filed purchased-gas adjustment for the current month when the gas was purchased \$25/Dth., the utility shall make a filing to the Commission within 14 days after the event ends identifying: A. Its costs for procuring gas for Minnesota customers while gas prices were inflated above this amount, B. What actions the utility took to account for or mitigate those costs, and C. Justifications for why its actions were prudent.

The Company's reasoning for proposing the changes is: 1) natural gas commodity prices are low by historical standards and CPE has paid commodity prices around \$2/Dth. in recent years. A PGA-only trigger for this filing could create a situation where natural gas prices may have spiked but remain under \$15/Dth. Adding the \$25/Dth. minimum price lessens the risk of the Company being required to make a filing when gas commodity prices are elevated, but not necessarily spiking. The second editorial change would give CenterPoint more time to assemble its compliance filing. The current language can be interpreted such that the compliance filing is due 14 days after the pricing event begins. If the pricing event lasts several days, the amount of time the Company has after pricing subside may not be sufficient to provide as complete a filing as CPE might like.

³⁹ 2024 Compliance filing at p. 5 and 6.

The Department notes that the January 2024 PE would have triggered a 14-day compliance filing even if the proposed changes had already been incorporated. The Commission set the threshold for EGC's at \$20/Dth. in the cost-recovery phase of this proceeding. CPEs proposed change doesn't vary that much from the Commission's definition. Hence, the Department doesn't oppose CPE's first proposed change to the Order Point. Given the review process for this docket, in which the Commission doesn't initiate its review of the Company's efforts until August 1st, the Department doesn't believe that the additional time the Company is requesting to make the compliance filing is unreasonable. As a result, the Department doesn't oppose the second proposed language change either.

E.3. North American Energy Standards Board Gas/Electric Harmonization Forum

The Department didn't discuss this topic at length in its comments. CenterPoint did reference this issue and included it under the long-term changes and market reforms. The Department notes that the four affected Minnesota utilities tried to change the Force Majeure language in the NAESB standard contract and were unsuccessful. CenterPoint will continue to report on this topic in its ACF.

The Department notes CenterPoint's efforts and concludes the Company complied with the reporting requirement in the Commission's February 17, 2023, Order at Order Point 4.

IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of CenterPoint's 2024 ACF and the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

A. RESPONSE TO COMMISSION QUESTIONS

The Department recommends the Commission:

- A.1. - conclude CenterPoint's 2024 ACF complies with the Commission's Orders in this proceeding.
- A.2. – accept and approve CenterPoint's 2024 ACF.
- A.3. – not make any changes to future compliance filing requirements.
- A.4 – conclude no issues or concerns at this time.

B. SUMMARY OF CENTERPOINT'S CUSTOMER PROTECTION PLAN

The Department has no recommendations regarding this section.

C. UPDATE ON CENTERPOINT'S EFFORTS TO MITIGATE THE RISK OF SHORT-TERM NATURAL GAS PRICE SPIKES

The Department has no recommendations regarding this section. The Department requests CenterPoint included a discussion of its efforts to update its demand response efforts since 2021 in its reply comments.

D. COMPARISON OF CPE'S RESPONSES TO THE JANUARY 2024 AND FEBRUARY 2021 PRICING EVENTS

The Department notes that its comparison of the Company's purchasing strategies during the two pricing events suggests that changes to CPE's contracting and purchasing strategies as well as increased use of its peaking and storage facilities mitigated some of the short-term risk of price spikes.

The Department has no recommendations regarding this section.

E. EXTRAORDINARY GAS COST COST-RECOVERY AND MISCELLANEOUS

The Department has no recommendations regarding this section. The Department notes that it doesn't oppose CenterPoint's proposed two edits to Order Point No. 3 of the Commission's February 17, 2023, Order in this proceeding.

Attachment 1 – Detailed Procedural Background for Docket No. G008/M-21-138

February 12 through 22, 2021	A combination of significant disruptions in natural gas supply combined with a sharp rise in natural gas demand, led to an extraordinary increase in natural gas spot market prices in Minnesota. The effects of the price spike were amplified by the closure of the wholesale natural gas markets for the three-day Presidents Day holiday weekend.
February 19, 2021	CenterPoint filed a letter with the Commission in Docket No. G008/M-21-138 noting the severity of its gas cost under-recovery and indicating a concern that the existing Annual Automatic Adjustment (AAA) might be inadequate to address an under-recovery of this magnitude.
February 23, 2021	The Commission held a Planning Meeting regarding the PE and authorized an investigation into the Pricing Event in Docket No. G999/CI-21-135.
March 2, 2021	The Commission issued an Order Opening Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers in Docket No. G999/CI-21-135.
March 10, 2021	The Commission issued a request for initial filings and notice of comments period with an initial date of April 9, 2021, in Docket No. G008/M-21-135.
March 16, 2021	CenterPoint filed a Petition for Recovery of Cost due to Extreme Gas Market Conditions in Docket No. G003/M-21-138. CPE stated that it had incurred approximately \$500 million in gas costs during the February 2021 Pricing Event (PE), and requested a variance from the existing Annual Automatic Adjustment(AAA) true-up mechanism.
March 22, 2021	The Commission issued a notice of Shortened Comment Period on Procedural Issues in response to CenterPoint's request for a variance to the AAA true-up mechanism in Docket No. G008/M-21-138.
April 2 through May 20, 2021	CenterPoint, Energy Cents Coalition (ECC) and Citizens Utility Board of Minnesota (CUB), the Department and the Office of the Attorney General Residential Utilities Division (RUD-OAG) filed comments and reply comments in response to the Commission's notice of comments dated March 10 th and 22 nd , 2021, in Docket Nos. G008/M-21-138 and G999/CI-21-135.
April 9, 2024	CenterPoint, Great Plains, Minnesota Energy Resources Company (MERC) and Northern States Power of Minnesota d/b/a Xcel Energy

	(Xcel, XE) filed comments in response to the Commission Notice dated March 10, 2021, in Docket No. G999/CI-21-135. CenterPoint also filed reply comments in Docket Nos. G999/CI-21-135 and G008/M-21-138.
May 13, 2021	The Commission discussed procedural issues regarding the two dockets at its weekly Agenda Meeting.
May 19, 2021	The Commission issued a notice of comment period which included questions related to the prudence and potential recovery of costs associated with the February 2021 PE.
June 4, 2021	The Commission issued its ORDER DENYING PETITION, in which the Commission: 1) denied CPE's petition for cost recovery; 2) choose not to consolidate the 21-135 and the 21-138 dockets, and; 3) declined to refer this matter to the Office of Administrative Hearings for contested case proceedings.
June 9, 2021	The OAG-RUD filed a letter requesting an extension for filing comments until July 8, 2021 in response to the Commission's May 19, 2021 notice of comment.
June 14, 2021	The Commission issued a notice of extension variance for comments on prudence but maintaining previous comment periods for other topics until July 6, 2021.
July 6 - 16, 2021	CUB/ECC, CenterPoint, City of Minneapolis (Minneapolis) and OAG-RUD filed comments. The Gas Utilities (CenterPoint, Great Plains, MERC and Xcel) filed joint comments in response to the Commission's May 10 th NOC.
July 19, 2021	CenterPoint, CUB/ECC, the Department, the Gas Utilities, the Suburban Rate Authority (SRA), and Minneapolis filed reply comments.
August 2, 2021	OAG-RUD filed a letter correcting the disallowances it had proposed.
August 30, 2021	The Commission issued its ORDER GRANTING VARIANCES AND AUTHORIZING MODIFIED COST RECOVERY SUBJECT TO PRUDENCE REVIEW, AND NOTICE OF AND ORDER FOR HEARING
September 20, 2021	The OAH issued its first prehearing Order.
October 22, 2021	CenterPoint, Xcel, and the Joint Gas Utilities filed direct testimony.
November 1, 2021	CPE, Great Plains, MERC and Xcel filed a joint communication plan compliance filing.
December 22, 2021	CUB, the Department, and OAG-RUD filed direct testimony.
January 21, 2022	CenterPoint, Xcel and the Joint Utilities filed rebuttal testimony.
February 11, 2022	CUB, the Department and OAG-RUD filed surrebuttal testimony.
February 17, 18, and 23, 2022	OAH held evidentiary hearings.
March 15, 2022	CenterPoint, CUB, the Department, the Joint Utilities, and OAG-RUD filed briefs.

March 25, 2022	CenterPoint, the Department and OAG-RUD filed reply briefs.
May 24, 2022	OAH filed its report on findings of fact, conclusions of law and recommendation.
June 3 and 6 2022	CPE, CUB, the Department, LIUNA/Minnesota/North Dakota and Minneapolis filed exceptions to the Administrative Law Judges Report
August 23, 2022	MPUC issued a notice of comment on forward-looking issues.
September 15, 2022	CenterPoint and Joint Commenters filed comments.
October 14, 2022	CUB, the Department and the OAG-RUD filed reply comments.
October 19, 2022	The Commission issued its ORDER DISALLOWING CERTAIN NATURAL GAS COSTS AND REQUIRING FURTHER ACTION
November 8, 2022	CPE filed a petition for reconsideration of the Commission's October 19, 2022 Order.
November 18, 2022	The Department filed an answer CPE's request for reconsideration.
January 6, 2023	Commission issued its ORDER DENYING PETITION FOR RECONSIDERATION
February 17, 2023	Commission issued its ORDER REQUIRING ACTIONS TO MITIGATE IMPACTS FOMR FUTURE NATURAL GAS PRICE SPIKES, SETTING FILING REQUIREMENTS, AND INITIATING A PROCEEDING TO ESTABLISH GAS RESOURCE PLANNING REQUIREMENTS
August 1, 2023	CenterPoint filed its 2023 annual compliance filing.
October 6, 2023	Commission issued a notice of comments on CPE's annual compliance filing.
November 1, 2023	The Department filed comments.
November 13, 2023	CenterPoint filed reply comments.
January 26, 2024	CPE filed compliance on cost impacts due to extreme market conditions.
March 28, 2024	Commission approved CPE's 2023 compliance filing.
July 30, 2024	Commission issued order accepting and approving CenterPoint's 2023 Annual Compliance Filing.
August 1, 2024	CPE filed its 2024 Annual Compliance Filing (ACF).
August 29, 2024	Commission issued a notice of comment period for CenterPoint's 2024 ACF.

State of Minnesota
Minnesota Department of Commerce

Utility Information Request

Docket Number: G008/M-24-146 - Request for Change in
Demand Units

Date of Request: 5/2/2024

Requested From: CenterPoint Energy Minnesota Gas

Response Due: 5/17/2024

Analyst Requesting Information: Ashley Uphus/John Kundert

Type of Inquiry: Other

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
DOC 005 P	<p>Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.</p> <p>Topic: Trend in the Cost of Physical Storage Reference(s): Not identified</p> <p>a. Please provide any information the Company has regarding the current market prices for natural gas storage.</p> <p>b. Please provide any information the Company has regarding the forecasted market prices for natural gas storage.</p> <p>Response:</p> <p>a. As previously mentioned in response to DOC 002 NP, the availability of storage opportunities to serve our customers in Minnesota are few and far between. Further, the availability of a utility being able to contract for storage directly with a supporting pipeline who also has the firm transportation capacity to go along with it, is even more of a scarcity. This is the primary reason CenterPoint Energy feels it is prudent and necessary to act on opportunities such as the Tenaska storage agreement as they present themselves. Firm storage service is the most valuable tool in its supply portfolio demonstrating price stability for its customers. As stated in the demand filing, Tenaska was unsuccessful at being awarded any capacity the first round of East Cheyenne Storage open season where the associated demand cost was lower.</p>

Response By: Donald Wynia

Title: Senior Analyst, Regulatory & Rates

Department: Regulatory Portfolio Management MN

Telephone: 612-321-4677

Page 1 of 2

- b. The Company does not have any insight or predictions on where prices for natural gas storage could go in the future and the fact that market prices are unpredictable. The Company does not know future prices, however, based on our historical experience we can only predict that they will continue to be more difficult to acquire. For further information please see the section in the Demand Entitlement Section under "21-138 Required Information". The Company will continue to report on storage trends based on the Company's experience in the market and report on it in this section of future demand entitlement filings.

Response By: Donald Wynia
Title: Senior Analyst, Regulatory & Rates
Department: Regulatory Portfolio Management MN
Telephone: 612-321-4677

State of Minnesota
Minnesota Department of Commerce

Utility Information Request

Docket Number: G-008/M-21-138 - Cost Impacts/Extreme Weather

Date of Request: 10/28/2024

Requested From: CenterPoint Energy Minnesota Gas

Response Due: 11/7/2024

Analyst Requesting Information: John Kundert

Type of Inquiry: Other

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
DOC 081 P	<p>Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.</p> <p>Topic: Underground Storage Reference(s): Customer Protection Plan, Attachment A, filed September 15, 2022</p> <ol style="list-style-type: none">1. Please provide a narrative that explains the Company's efforts since 2021 to increasing planned daily withdrawals from Waterville Company-owned storage.2. Please provide a narrative that explains the Company's efforts since 2021 to increasing pipeline capacity on NNG to allow for incremental deliverability of Waterville withdrawals.3. Please provide a narrative that explains the Company's efforts since 2021 to expanding Waterville working gas storage capacity and withdrawal capability.4. Provide a narrative that discusses the Company's efforts since 2021 to increase virtual marketer storage.5. Provide a narrative that discusses the Company's efforts since 2021 to increase contracted storage and transportation.6. What was the source of the additional underground storage increase from the 2020-2021 to the 2023-2024 GPP's. Was it due to increased virtual marketer or pipeline contracted storage and transportation?7. Please include separate estimates of the costs and benefits of the Company's efforts referenced in (1) through (5) to ratepayers.

Response By: John Heer/Kristal Dipuccio

Title: Director, Storage & Supply Planning/Manager, Gas Supply

Department: Gas Storage & Supply Planning/Gas Purchasing, MN

Telephone: 612-321-4345/713-207-5965

Page 1 of 3

Response:

1. The Company continues to plan Waterville Storage daily withdrawals as the forecasted gas day requirements develop. We continue to plan for supply contingencies that may be needed based on weather or market changes, particularly over weekends and holidays. These contingencies may include Company storage daily withdrawal.
2. The Company is increasing its transportation entitlement on Northern Natural Gas's pipeline used to transport gas withdrawn from its Waterville storage facility by **[TRADE SECRET INFORMATION BEGINS...TRADE SECRET INFORMATION ENDS]**
3. The Company has reviewed requirements needed to increase working gas capacity and peak withdrawal capabilities at the Waterville facility. The Company has determined that within the limits of our existing gas storage permit, and subject to several permit requirements, we can possibly increase working gas capacity to approximately **[TRADE SECRET INFORMATION BEGINS...TRADE SECRET INFORMATION ENDS]** No engineering work has been performed to pursue this in detail. Preliminary indication is this may be a cost effective project. The Company plans to do a more detailed analysis of this option for inclusion in its upcoming Gas Utility Integrated Resource filing required by the Minnesota Public Utilities Commission Order of 28 October 2024.
4. CenterPoint recognizes the high value of virtual marketer storage, and will continue to retain the amount of virtual marketer storage it current has in its supply portfolio, along with seeking ways of adding additional storage or securing the transaction for a longer term. For example, the Company solicited bids in the summer of 2024 and **[TRADE SECRET INFORMATION BEGINS...TRADE SECRET INFORMATION ENDS]**
5. As reported in Docket No.'s 23-221 and 24-146. The Company acquired additional firm storage services to the Company's supply portfolio is the most valuable approach to increasing price stabilization and reducing price volatility for its ratepayers. In addition to extending the virtual marketer storage, during 2023 CenterPoint secured an additional 7.5 Bcf of contracted storage:
 - 1 East Cheyenne Storage partnership with **[TRADE SECRET INFORMATION BEGINS...TRADE SECRET INFORMATION ENDS]**
 - 1 **[TRADE SECRET INFORMATION BEGINS...TRADE SECRET INFORMATION ENDS]**
6. When speaking to the Company-owned underground storage, the difference between the numbers referenced is storage capacity versus working gas quantity. **[TRADE SECRET INFORMATION**

Response By: John Heer/Kristal Dipuccio

Title: Director, Storage & Supply Planning/Manager, Gas Supply

Department: Gas Storage & Supply Planning/Gas Purchasing, MN

Telephone: 612-321-4345/713-207-5965

BEGINS...TRADE SECRET INFORMATION ENDS]

7. Please refer to CenterPoint's most recent demand entitlement filing submitted November 1, 2024, in Docket No. 24-146. More details can be found in the initial filing made April 1, 2024. Firm storage services is considered the most valuable tool in the Company's supply portfolio in order to achieve desired stabilization percentage.

Response By: John Heer/Kristal Dipuccio
Title: Director, Storage & Supply Planning/Manager, Gas Supply
Department: Gas Storage & Supply Planning/Gas Purchasing, MN
Telephone: 612-321-4345/713-207-5965

State of Minnesota
Minnesota Department of Commerce

Utility Information Request

Docket Number: G-008/M-21-138 - Cost Impacts/Extreme Weather

Date of Request: 10/28/2024

Requested From: CenterPoint Energy Minnesota Gas

Response Due: 11/7/2024

Analyst Requesting Information: John Kundert

Type of Inquiry: Other

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
DOC 082 P	<p>Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.</p> <p>Topic: Peak Shaving Reference(s): Customer Protection Plan, Attachment A, filed September 15, 2022</p> <ol style="list-style-type: none">1. Please provide a narrative that explains the Company's efforts since 2021 to upgrade LNG liquefaction to allow for winter refueling.2. Please provide a narrative that explains the Company's efforts since 2021 to upgrade the LNG system to increase daily vaporization capacity.3. Please provide a narrative that explains the Company's efforts since 2021 regarding the implementation of the Balance of Season Inventory Modeling approach.4. Please include separate estimates of the costs and benefits of the Company's efforts referenced in (1) through (3) to ratepayers. <p>Response:</p> <ol style="list-style-type: none">1. The Company has pursued a number of liquefaction system changes since 2021 to allow for operation of the liquefaction system in winter weather conditions. These changes include addition of heat tracing to some systems, replacement of some instruments and controls with equipment rated to operate in colder temperatures, adding variable speed controls to some process motors to improve a turndown to adapt to cold temperature operations. These changes allow Company to operate

Response By: John Heer

Title: Director, Storage & Supply Planning

Department: Gas Storage & Supply Planning

Telephone: 612-321-4345

liquefaction during the winter if appropriate.

**[TRADE SECRET INFORMATION BEGINS... ..TRADE
SECRET INFORMATION ENDS]**

2. **[TRADE SECRET INFORMATION BEGINS... ..TRADE
SECRET INFORMATION ENDS]**
3. The company has not implemented this modeling to date.
4. The cost of winterizing the LNG liquefaction system is minor. **[TRADE
SECRET INFORMATION BEGINS... ..TRADE SECRET
INFORMATION ENDS]**

Response By: John Heer
Title: Director, Storage & Supply Planning
Department: Gas Storage & Supply Planning
Telephone: 612-321-4345

State of Minnesota
Minnesota Department of Commerce

Utility Information Request

Docket Number: G-008/M-21-138 - Cost Impacts/Extreme Weather

Date of Request: 10/28/2024

Requested From: CenterPoint Energy Minnesota Gas

Response Due: 11/7/2024

Analyst Requesting Information: John Kundert

Type of Inquiry: Other

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
DOC 086	<p>Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.</p> <p>Topic: Interruptible Curtailment for Economic Dispatch Reference(s): DeMerritt Testimony in Docket No. G008/GR-23-173</p> <p>1. How much additional interruptible load do these tariff changes represent in nominal and percentage terms?</p> <p>Response:</p> <p>1. In Docket G008/GR-23-173 the Company did not project any additional interruptible load as a result of the economic curtailment tariffs. The Company projected that 62% of current interruptible customers would elect to take service under the economic tariff and could be interrupted for either operational or economic reasons.</p>

Response By: Seth DeMerritt
Title: Manager, Regulatory & Rates
Department: Regulatory Portfolio Management MN
Telephone: 612-321-4423

State of Minnesota
Minnesota Department of Commerce

Utility Information Request

Docket Number: G-008/M-21-138 - Cost Impacts/Extreme Weather

Date of Request: 10/28/2024

Requested From: CenterPoint Energy Minnesota Gas

Response Due: 11/7/2024

Analyst Requesting Information: John Kundert

Type of Inquiry: Other

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
DOC 085	<p>Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.</p> <p>Topic: Economic Dispatch of Peak Shaving, Interruptible Curtailments, and Underground Storage</p> <p>Reference(s): Customer Protection Plan, Attachment A, filed September 15, 2022</p> <ol style="list-style-type: none">1. Is the Company pursuing any other ideas for the economic dispatch of Company-owned storage or the Company's LNG peaking facility, or interruptible customer loads, after CenterPoint's original proposal was not implemented?2. If so, please provide a narrative that discusses those new ideas for economic dispatch for those two contributing factors to gas supply and one contributing factor to gas demand.3. If so, please include estimates of the potential costs and benefits of economically dispatching Company-owned storage, the Company's LNG peak shaving facility and interruptible customers referenced in (1) and (3) from a ratepayer perspective. <p>Response:</p> <ol style="list-style-type: none">1. No, the Company has not solidified parameters for the economic dispatch of Company-owned storage, Company LNG Peaking facilities, or interruptible customer loads. Given that there are many factors for the Company to consider, the Company makes these decisions based on the

Response By: John Heer/Kristal Dipuccio/Timothy Olsen

Title: Director/Manager/Manager

Department: Gas Storage & Supply Plng/Gas Purchasing, MN/Gas Control-MNPage 1 of 2

Telephone: 612-321-4345/713-207-5965/612-321-5384

information the company has at that time. Different factors come in to play, including conditions of the market, day of the week, and forecasted weather/load. The Company looks at curtailment and peaks as options to manage gas purchases to stabilize prices. However, the first priority for the Company is to provide reliable services to our customers. This includes managing peaking facilities based on the entire winter season and not just on one day where we could see an increase in pricing. In Docket 23-173, the Company filed new tariff's that allow for interruptible customers to sign up for economic curtailment. This would allow the Company to curtail them for economic reasons.

2. Please see response to 1.
3. Please see response to 1.

Response By: John Heer/Kristal Dipuccio/Timothy Olsen

Title: Director/Manager/Manager

Department: Gas Storage & Supply Plng/Gas Purchasing, MN/Gas Control-MNPage 2 of 2

Telephone: 612-321-4345/713-207-5965/612-321-5384

State of Minnesota
Minnesota Department of Commerce

Utility Information Request

Docket Number: G-008/M-21-138 - Cost Impacts/Extreme Weather

Date of Request: 10/28/2024

Requested From: CenterPoint Energy Minnesota Gas

Response Due: 11/7/2024

Analyst Requesting Information: John Kundert

Type of Inquiry: Other

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
DOC 080	<p>Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.</p> <p>Topic: Supply Mix Diversity Reference(s): Customer Protection Plan, Attachment A, filed September 15, 2022</p> <ol style="list-style-type: none">1. Please provide a narrative that explains the Company's efforts since 2021 to increase the supply diversity of its gas contracting and purchasing efforts that provides more optionality to purchase from different price indices.2. Please include estimates of the costs and benefits of that effort to ratepayers. <p>Response:</p> <ol style="list-style-type: none">1. Please refer to discussion point 5 of the Company's most recent August 1 Annual Compliance Filing: <i>Docket No. 21-135, submitted on August 1, 2024.</i> <p>CenterPoint Energy uses a diversified gas supply portfolio consisting of a combination of baseload supplies, call options, daily spot market purchases, storage, and peaking supplies which are designed to maintain reliability, while balancing price protection, stability of gas supply costs, and reasonable prices.</p>

Response By: Kristal Dipuccio

Title: Manager, Gas Supply

Department: Gas Purchasing, Minnesota

Telephone: 713-207-5965

Post Storm Uri, and as CenterPoint Energy continues to endure natural events, the Company continues to evaluate plan modifications/enhancements to its supply plan and procurement strategies in efforts to further protect its customers from extraordinary costs due to price volatility or future market price spikes:

- 1. Increased baseload first-of-the-month index purchases which reduced the percentage of planned supply to be met through daily/swing gas purchases.
 - 1. Ensured the Company's supply mix strategy at its primary receipt points is to be met by a blend of first-of-the-month index purchases as well as daily index purchases to better achieve price diversification.
 - 1. Acted on securing long-term hedges of 24-months beginning April 1, 2023, and will continue to evaluate these opportunities going forward.
 - 1. Received approval from the Minnesota Public Utilities Commission to modify the structure of the hedging order to allow for more flexibility and to accommodate future customer growth in Docket G008/M-23-360.
 - 1. Adjusted winter season 2024-2025 hedging strategy to be based on a maximum hedged volume of 25% of anticipated customer load requirements.
 - 1. Continue to evaluate and explore storage opportunities whose acquisitions would further stabilize the Company's supply portfolio (i.e., East Cheyenne and ANR Pipeline Company).
2. As referenced in numerous Company filings, CenterPoint's desire is to achieve price stabilization for its ratepayers by compiling and then executing a well rounded and flexible supply portfolio that accomplishes supply reliability, reduced price volatility and reasonable price. The Company is not in the business of setting the market or beating it, rather it aims to make the most prudent supply and dispatch descisions based on its desired plan filed each year. Please reference Schedule H in the Company's monthly PGA filings for supplier costs.

State of Minnesota
Minnesota Department of Commerce

Utility Information Request

Docket Number: G-008/M-21-138 - Cost Impacts/Extreme Weather

Date of Request: 10/28/2024

Requested From: CenterPoint Energy Minnesota Gas

Response Due: 11/7/2024

Analyst Requesting Information: John Kundert

Type of Inquiry: Other

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
DOC 084 P	<p>Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.</p> <p>Topic: Pipeline Capacity Contracts Reference(s): Customer Protection Plan, Attachment A, filed September 15, 2022</p> <ol style="list-style-type: none">1. Please provide a narrative that explains the Company's efforts since 2021 to use its transportation capacity on interstate or in-state pipelines (gas purchased during the heating season using different contract terms) to mitigate the risk of short-term price spikes.2. Please include an estimate of the costs and benefits of the Company's effort referenced in (1) to ratepayers. <p>Response:</p> <ol style="list-style-type: none">1. Under the Company's growth election rights in its Northern Natural firm transportation contracts, CenterPoint has the option to participate in Northern Lights Open Seasons which provides for normal customer growth additions on a two-year cycle. <p>1 [TRADE SECRET INFORMATION BEGINS... .</p> <p>1 .</p> <p>1TRADE SECRET</p> <p>INFORMATION ENDS]</p> <p>It is important to mention the amount of work, strategizing and prudence</p>

Response By: Kristal Dipuccio

Title: Manager, Gas Supply

Department: Gas Purchasing, Minnesota

Telephone: 713-207-5965

review that is involved in this process before a decision is reached. **[TRADE SECRET INFORMATION BEGINS... ..TRADE SECRET INFORMATION ENDS]**

Due to the increase in and expensive constructions associated with capacity expansion on Northern Natural, CenterPoint will continue to evaluate alternative solutions and make prudent/strategic decisions to accommodate future customer growth needs. Examples of this could be, but are not limited to, capacity on Viking Gas Transmission and/or additional LNG facilities installed into the Company's Distribution system.

2. Please refer to the Company's demand entitlement filings in Docket Nos. 22-306, 23-221 and 24-146.

Response By: Kristal Dipuccio
Title: Manager, Gas Supply
Department: Gas Purchasing, Minnesota
Telephone: 713-207-5965

State of Minnesota
Minnesota Department of Commerce

Utility Information Request

Docket Number: G-008/M-21-138 - Cost Impacts/Extreme Weather

Date of Request: 10/28/2024

Requested From: CenterPoint Energy Minnesota Gas

Response Due: 11/7/2024

Analyst Requesting Information: John Kundert

Type of Inquiry: Other

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
DOC 083	<p>Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.</p> <p>Topic: Financial Hedging Reference(s): Customer Protection Plan, Attachment A, filed September 15, 2022</p> <ol style="list-style-type: none">1. Please provide a narrative that summarizes the Company's efforts since 2021 to optimize the use of its financial hedging products.2. Please provide a narrative that explains the Company's efforts since 2021 to increase the diversity of hedging products to include additional delivery points.3. Please provide a narrative that explains the Company's efforts since 2021 to enter longer-term hedges prior to 2024-2025 heating season and its attempts at securing longer-term hedges on an ongoing basis.4. Please include separate estimates of the costs and benefits of the Company's efforts referenced in (1) through (3) to ratepayers. <p>Response:</p> <ol style="list-style-type: none">1. As discussed in Docket No. 23-360, the Company does not have financial hedging products. If there are any changes to this approach, CenterPoint will make sure to provide updates in its filings.2. When determining what receipt point the Company will use in its hedge transactions, decisions are made based on its transportation contract

Response By: Kristal Dipuccio

Title: Manager, Gas Supply

Department: Gas Purchasing, Minnesota

Telephone: 713-207-5965

entitlements. Although there are various receipt points on CenterPoint's Northern Natural contracts, all of the price points tied to them are based on the NNG-Ventura index or the NNG-Demarc index. The Company will continue efforts in evaluating alternative options in pipeline transportation capacity to potentially incorporate additional price points in the future.

3. The Company has executed a few longer-term hedges (24-month) with the furthest hedge being out to March 2026. Based on expert advice (timing) from its third party consultant Aegis Hedging, CenterPoint will continue to layer these products into its supply portfolio going forward.
4. Please refer to hedging evaluation in AAA report, Docket No. 24-299 submitted on August 29, 2024.

Response By: Kristal Dipuccio
Title: Manager, Gas Supply
Department: Gas Purchasing, Minnesota
Telephone: 713-207-5965

State of Minnesota
Minnesota Office of the Attorney General

Utility Information Request

Docket Number: G-999/CI-21-135 - Gas Costs Investigation Date of Request: 6/18/2021
Requested From: CenterPoint Energy Minnesota Gas Response Due: 6/30/2021

Analyst Requesting Information: Peter Scholtz

Type of Inquiry: Other

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.																									
OAG 118A	<p>Reference: CenterPoint's response to OAG IR 118 CPE</p> <p>OAG IR 118 CPE requested actual interruptible load for each day from February 12 to 22, 2021. The Company's response only provides total potential interruptible load and actual curtailments.</p> <p>Provide <i>actual</i> interruptible load on each day from February 12 to 22, 2021. If interruptible load data is not available, explain why and provide an estimate for each day.</p> <p>Response:</p> <p>Please see the table below for actual interruptible load for each day from February 12 to 22, 2021.</p> <table><tr><th></th><th>Actual Interruptible Load (Dth)</th></tr><tr><td>12-Feb</td><td>85,356</td></tr><tr><td>13-Feb</td><td>76,697</td></tr><tr><td>14-Feb</td><td>82,241</td></tr><tr><td>15-Feb</td><td>89,613</td></tr><tr><td>16-Feb</td><td>87,522</td></tr><tr><td>17-Feb</td><td>82,637</td></tr><tr><td>18-Feb</td><td>79,383</td></tr><tr><td>19-Feb</td><td>68,047</td></tr><tr><td>20-Feb</td><td>34,098</td></tr><tr><td>21-Feb</td><td>31,671</td></tr><tr><td>22-Feb</td><td>29,336</td></tr></table>		Actual Interruptible Load (Dth)	12-Feb	85,356	13-Feb	76,697	14-Feb	82,241	15-Feb	89,613	16-Feb	87,522	17-Feb	82,637	18-Feb	79,383	19-Feb	68,047	20-Feb	34,098	21-Feb	31,671	22-Feb	29,336
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Response By: Seth DeMerritt
Title: Manager, Regulatory Affairs
Department: Mng Smr Reg Svc Rev Req
Telephone: 612-321-4423

State of Minnesota
Minnesota Office of the Attorney General

Utility Information Request

Docket Number: G-999/CI-21-135 - Gas Costs Investigation Date of Request: 6/18/2021
Requested From: CenterPoint Energy Minnesota Gas Response Due: 6/30/2021

Analyst Requesting Information: Peter Scholtz

Type of Inquiry: Other

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.																									
OAG 120A	<p>Reference: CenterPoint's response to OAG IR 120 CPE</p> <p>OAG IR 120 CPE requested actual firm load data. The Company's response appears to provide <i>combined</i> firm and interruptible data.</p> <p>Provide the Company's actual firm load on each day from February 12 to 22, 2021, or confirm that the attachment to OAG IR 120 CPE provides <i>only</i> firm load. If firm load data is not available, explain why not and provide an estimate for each day.</p> <p>Response:</p> <p>Please see the table below for actual firm load for each day from February 12 to 22, 2021.</p> <table><tr><th></th><th>Actual Firm Load (Dth)</th></tr><tr><td>12-Feb</td><td>1,068,183</td></tr><tr><td>13-Feb</td><td>1,110,341</td></tr><tr><td>14-Feb</td><td>1,146,601</td></tr><tr><td>15-Feb</td><td>1,094,233</td></tr><tr><td>16-Feb</td><td>971,927</td></tr><tr><td>17-Feb</td><td>897,286</td></tr><tr><td>18-Feb</td><td>823,825</td></tr><tr><td>19-Feb</td><td>791,372</td></tr><tr><td>20-Feb</td><td>673,027</td></tr><tr><td>21-Feb</td><td>604,459</td></tr><tr><td>22-Feb</td><td>473,822</td></tr></table>		Actual Firm Load (Dth)	12-Feb	1,068,183	13-Feb	1,110,341	14-Feb	1,146,601	15-Feb	1,094,233	16-Feb	971,927	17-Feb	897,286	18-Feb	823,825	19-Feb	791,372	20-Feb	673,027	21-Feb	604,459	22-Feb	473,822
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Response By: Seth DeMerritt
Title: Manager, Regulatory Affairs
Department: Mng Smr Reg Svc Rev Req
Telephone: 612-321-4423

State of Minnesota
Minnesota Office of the Attorney General

Utility Information Request

Docket Number: G-999/CI-21-135 - Gas Costs Investigation

Date of Request: 8/8/2024

Requested From: CenterPoint Energy Minnesota Gas

Response Due: 8/20/2024

Analyst Requesting Information: Katherine Hinderlie

Type of Inquiry: Other

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
OAG 020	<p>Reference: CenterPoint Energy's August 1, 2024 Compliance Filing in Docket No. G-999/CI-21-135</p> <p>A. State whether the utility called on its interruptible customers to curtail at any point during gas days January 11 through January 18, 2024;</p> <p>B. If the response to part A above is affirmative, state the following:</p> <ol style="list-style-type: none">1. The specific dates and times the curtailment order(s) was effective;2. For each curtailment order, the length of the curtailment order.3. For each curtailment order, the number of interruptible customers asked to curtail;4. For each curtailment order, the number of interruptible customers that complied with the curtailment order; and5. For each curtailment order, the approximate amount of avoided purchases of daily spot gas due to the curtailment order provided in both Dekatherms and dollar amounts. <p>C. If the response to part B above is negative, explain why it was prudent for the utility to not call a curtailment order in light of the facts known at the time during the period of January 11 through January 18, 2024.</p> <p>Response:</p> <p>A. Yes, a supply curtailment was called for all LV and SV-B Sales Service customers.</p> <p>B. 1. January 15, 2024, 3:35 p.m.</p> <p>2. Depending on the customer, the customer had gas back on January 16 at 3:35 p.m. or January 17, 2024, at 8:00 a.m.</p>

Response By: Seth DeMerritt

Title: Manager, Regulatory & Rates

Department: Regulatory Portfolio Management MN

Telephone: 612-321-4423

3. A total of 242 customers were curtailed; 143 customers had gas back on January 16 and 99 customers had gas back on January 17, 2024.

4. Gas day 15 – 153 interruptible customers complied.

Gas day 16 – 170 interruptible customers complied.

NOTE: Gas day 16 ended on January 17 at 9:00.

5. 100,000 Dekatherms were curtailed at an approximate value of \$3,537,500.

C. N/A

State of Minnesota
Minnesota Department of Commerce

Utility Information Request

Docket Number: G-008/M-21-138 - Cost Impacts/Extreme Weather

Date of Request: 10/28/2024

Requested From: CenterPoint Energy Minnesota Gas

Response Due: 11/7/2024

Analyst Requesting Information: John Kundert

Type of Inquiry: Other

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
DOC 089	<p>Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.</p> <p>Topic: Extraordinary Gas Cost Recovery Reference(s): Quarterly Compliance and Tracking Filing, filed October 1, 2024</p> <ol style="list-style-type: none">1. CenterPoint identified its under-recovery as \$154,060,186 in its quarterly compliance filing submitted on October 1, 2024.<ol style="list-style-type: none">a. Given the current Commission-approved recovery mechanism, will the Company recover the entirety of the 2021 February 13th through 17th Total Extraordinary Expense by November 2026?b. If yes, please identify a range of dates by which the Company forecasts it will have recovered the full amount of the \$372,418,366?c. If not, please provide and estimate of the additional amount of time that would be required to recover the full amount of \$372,418,366. <p>Response:</p> <ol style="list-style-type: none">1.<ol style="list-style-type: none">a. As shown on the Company's December 16, 2022, filing, the Company had anticipated being under-recovered by the amount of \$146,105,479 as of the end of August 2024. Therefore, due to the lower than anticipated actual sales through August 2024, and assuming a return to normal sales levels going forward, the Company would anticipate being under-recovered \$8,023,073 at the end of

Response By: Seth DeMerritt

Title: Manager, Regulatory & Rates

Department: Regulatory Portfolio Management MN

Telephone: 612-321-4423

Page 1 of 2

November 2026.

b. N/A

c. If the Company is in an under-recovered position at the end of November 2026, the Company would incorporate the under-recovered amount into the subsequent automatic adjustment filing in September 2027 as ordered by the Commission in the October 19, 2022, Order:

“[T]he Commission will require CenterPoint to incorporate any remaining true-up in the first annual automatic adjustment report following the end of the 63-month recovery period.”

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
Public Comments**

Docket No. G999/CI-21-135 and G008/M-21-138

Dated this **27th** day of **November 2024**

/s/Sharon Ferguson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP		50 S 6th St Ste 1500 Minneapolis MN, 55402-1498 United States	Electronic Service		No	21-135Official Service List
2	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-135Official Service List
3	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall FI 5 Minneapolis MN, 55401 United States	Electronic Service		No	21-135Official Service List
4	Alicia	Berger	alicia.e.berger@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	21-135Official Service List
5	James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
6	Mike	Boughner	michael.l.boughner@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	21-135Official Service List
7	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	21-135Official Service List
8	Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
9	Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-135Official Service List
10	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	21-135Official Service List
11	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	21-135Official Service List
12	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	21-135Official Service List
13	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	21-135Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
27	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	21-135Official Service List
28	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
29	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
30	Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
31	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-135Official Service List
32	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	21-135Official Service List
33	Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	21-135Official Service List
34	Amy	Liberkowsky	amy.a.liberkowsky@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	21-135Official Service List
35	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	21-135Official Service List
36	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
37	Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	21-135Official Service List
38	Sarah	Mead	sarah.mead@wecenergygroup.com	MERC		null null, null United States	Electronic Service		No	21-135Official Service List
39	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN,	Electronic Service		No	21-135Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55101-2131 United States				
40	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	21-135Official Service List
41	David	Moeller	dmoeller@allte.com	Minnesota Power			Electronic Service		No	21-135Official Service List
42	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
43	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
44	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	21-135Official Service List
45	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	21-135Official Service List
46	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-135Official Service List
47	Lisa	Peterson	lisa.r.peterson@xcelenergy.com			414 Nicollet Mall FL 7 Minneapolis MN, 55401 United States	Electronic Service		No	21-135Official Service List
48	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	21-135Official Service List
49	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	21-135Official Service List
50	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	21-135Official Service List
51	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
52	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN,	Electronic Service		No	21-135Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55101-2131 United States				
53	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States	Electronic Service		No	21-135Official Service List
54	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	21-135Official Service List
55	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	21-135Official Service List
56	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	21-135Official Service List
57	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
58	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
59	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	21-135Official Service List
60	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
61	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
62	Kent	Sulem	ksulem@mmua.org			3131 Fernbrook Ln N Ste 200 Plymouth MN, 55447-5337 United States	Electronic Service		No	21-135Official Service List
63	Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine		225 S 6th St Ste 3500 Capella Tower Minneapolis MN, 55402-4629 United States	Electronic Service		No	21-135Official Service List
64	Casey	Whelan	cwhelan@kinectenergy.com	Kinect Energy Group		605 Highway 169 N Ste 1200 Plymouth MN, 55441 United States	Electronic Service		No	21-135Official Service List
65	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis	Electronic Service		No	21-135Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55402 United States				
66	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	21-135Official Service List
67	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Jorge	Alonso	jorge.alonso@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	21-138Official Service List
2	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		Yes	21-138Official Service List
3	James H.	Barkley	james.barkley@bakerbotts.com	Baker Botts		910 Louisiana Street Houston TX, 77002-4995 United States	Electronic Service		No	21-138Official Service List
4	Jessica	Barnard	jessica.barnard@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-138Official Service List
5	James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	21-138Official Service List
6	Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		Yes	21-138Official Service List
7	Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-138Official Service List
8	Barbara	Case	barbara.case@state.mn.us		Office of Administrative Hearings	600 N. Robert St. St. Paul MN, 55101 United States	Electronic Service		No	21-138Official Service List
9	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	21-138Official Service List
10	Seth	DeMerritt	seth.demerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-138Official Service List
11	Richard	Dornfeld	richard.dornfeld@ag.state.mn.us		Office of the Attorney General - Department of Commerce	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul MN, 55101	Electronic Service		No	21-138Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
12	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	21-138Official Service List
13	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	21-138Official Service List
14	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	21-138Official Service List
15	Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY		401 Nicollet Mall FL 8 Minneapolis MN, 55401 United States	Electronic Service		Yes	21-138Official Service List
16	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	21-138Official Service List
17	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 United States	Electronic Service		No	21-138Official Service List
18	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Suite 1400 St. Paul MN, 55101-2134 United States	Electronic Service		No	21-138Official Service List
19	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	21-138Official Service List
20	Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-138Official Service List
21	Andrew	Larson	andrew.m.larson@state.mn.us		Public Utilities Commission	121 7th Place E., #350 Saint Paul MN, 55101 United States	Electronic Service		Yes	21-138Official Service List
22	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board		332 Minnesota	Electronic Service		No	21-138Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				of Minnesota		Street, Suite W1360 St. Paul MN, 55101 United States				Service List
23	Kathryn	Lloyd	kathy.lloyd@centerpointenergy.com	CenterPoint Energy		null null, null United States	Electronic Service		No	21-138Official Service List
24	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	21-138Official Service List
25	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	21-138Official Service List
26	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	21-138Official Service List
27	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-138Official Service List
28	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	21-138Official Service List
29	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	21-138Official Service List
30	Lisa	Peterson	lisa.r.peterson@xcelenergy.com			414 Nicollet Mall FL 7 Minneapolis MN, 55401 United States	Electronic Service		No	21-138Official Service List
31	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		Yes	21-138Official Service List
32	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-	Electronic Service		Yes	21-138Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						2131 United States				
33	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-138Official Service List
34	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States	Electronic Service		Yes	21-138Official Service List
35	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	21-138Official Service List
36	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	21-138Official Service List
37	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-138Official Service List
38	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	21-138Official Service List
39	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	21-138Official Service List
40	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	21-138Official Service List
41	Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine		225 S 6th St Ste 3500 Capella Tower Minneapolis MN, 55402-4629 United States	Electronic Service		No	21-138Official Service List
42	James	Worlobah	james.worlobah@state.mn.us		Public Utilities Commission	121 7th Place E, Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	21-138Official Service List
43	Michael A.	Yuffee	michael.yuffee@bakerbotts.com	Baker Botts		700 K St NW Washington	Electronic Service		No	21-138Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						DC, 20001 United States				Service List