

August 12, 2013

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

RE: Comments of the Minnesota Department of Commerce, Division of Energy Resources
Docket No. G008/GR-13-316

Dear Dr. Haar:

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

In the Matter of the Application by CenterPoint Energy Resources Corporation d/b/a CenterPoint Energy Minnesota Gas for Authority to Increase Rates for Natural Gas Service in Minnesota (Petition).

The Petition was filed on August 2, 2013 by:

Joseph J. Vortherms
Division Vice President
CenterPoint Energy
800 LaSalle Avenue, 15th Floor
Minneapolis, Minnesota 55402

The DOC recommends that the Commission:

- accept CenterPoint Energy Resources Corporation's rate case filing in the present docket as complete; and
- refer this matter to the Office of Administrative Hearings.

The DOC is available to answer any questions that the Commission may have.

Sincerely,

/s/ MARK JOHNSON
Financial Analyst

MJ/ja
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET No. G008/GR-13-316

I. OVERVIEW

On August 5, 2013, the Minnesota Public Utilities Commission (Commission) issued a notice requesting that potential parties submit comments on whether the general rate case petition (Petition) filed on August 2, 2013 by CenterPoint Energy Resources Corporation d/b/a CenterPoint Energy Minnesota Gas (CPE or the Company) complies with the filing requirements of Minnesota Statutes §216B.16, Minnesota Rules parts 7825.3100 to 7825.4400, and Commission Orders. The Commission also stated that comments are appropriate on whether this matter should be sent to the Office of Administrative Hearings for an evidentiary hearing on the propriety of the proposed rate change. The Minnesota Department of Commerce, Division of Energy Resources (DOC) submits the following Comments, pursuant to the Commission's August 5, 2013 notice.

II. DOC ANALYSIS

The DOC conducted a review of the contents of the Petition to verify the Company's compliance with:

- statutory requirements (Minnesota Statutes §216B.16);
- Commission's rules governing filing requirements for rate changes (Minnesota Rules parts 7825.3100 to 7825.4400);
- Commission Orders pursuant to CenterPoint's most recent general rate case in Docket No.G008/GR-08-1075; and

- Commission Orders in various dockets prior to or subsequent to CenterPoint's most recent general rate case.

Company Witness Joseph J. Vortherms provided a matrix of regulatory requirements for the Company's filing in his JJV-D, Schedule 4, contained in Volume 2 of 2 of CPE's General Rate Petition. This table lists and identifies where in the Petition the Company has addressed the applicable Statutes and Rules, and prior Commission Orders.

Based on our review, the DOC concludes that CPE's filing complies with the filing requirements. The DOC emphasizes that its review at this stage of the proceeding pertains to whether the Company's Petition discussed the issues in the list noted above, not as to whether the Company has met its burden of proof to show that its proposals are reasonable. Such analysis is the focus of the investigatory period in the initial stage of the proceeding, based on the merits of the Petition. As such, issues can be and will be further developed through information requests. The quality of the record that will be developed for the Commission's decisions depend in large part on the Company providing timely and complete responses to information requests. The Department appreciates the efforts by CPE to date in keeping the Department informed and responding to questions.

Accordingly, the DOC recommends that the Commission accept the Petition and refer this matter to the Office of Administrative Hearings for a contested case proceeding.

III. DOC RECOMMENDATIONS

The DOC recommends that the Commission:

1. accept CPE's rate case filing in the present docket as complete; and
2. refer this matter to the Office of Administrative Hearings.

/ja

CERTIFICATE OF SERVICE

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

Minnesota Department of Commerce
Comments

Docket No. G008/GR-13-316

Dated this 12th day of August, 2013

/s/Sharon Ferguson

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