

August 29, 2014

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

RE: Response Comments of the Minnesota Department of Commerce, Division of Energy Resources in the Matter of CenterPoint Energy's (CenterPoint or the Company) 2013 Demand Side Management Financial Incentive, Conservation Improvement Program Tracker Report, and Conservation Cost Recovery Adjustment Aggregated Compliance Filing (*Petition*).
Docket No. G008/M-14-368

Dear Dr. Haar:

On August 1, 2014, CenterPoint submitted Reply Comments to the Department's July 16, 2014 Comments on CenterPoint's Conservation Improvement Program (CIP) Tracker Report. The Company provided a correction to the CIP tracker projections for 2014 and 2015, and indicated that it continued to support a 2015 CCRA rate of \$0.00884 per therm. Further, CenterPoint indicated that it objected to the Department's revised CCRA calculation and its recommendations to discontinue the application of carrying charges on the CIP tracker account. The Department provides its response below.

As explained in the Department's Comments, setting a CCRA at the level that will zero out the CIP tracker balance at any given time (e.g., December 31, 2015), will not result in minimized total carrying costs because the CIP tracker balance varies considerably from month to month. The Department concluded that a CCRA of \$0.002626 per therm would minimize monthly carrying charges over the course of the year (rather than reduce the tracker balance to zero on a certain date). However, upon further reflection, the Department notes that actual costs and revenues may differ from those assumed in the Department's calculation. Therefore, we no longer recommend that the Commission approve a CCRA of \$0.002626.

For the reasons set forth in its Comments, the Department continues to support the elimination of carrying charges from the CIP tracker account beginning in the month after the Commission issues its Order in this docket. Alternately, the Department recommends that the Commission disallow application of the carrying charge to the Company's financial incentive.

Should carrying charges be eliminated from all or a portion of CenterPoint's CIP tracker, the Department recommends that the Commission require the Company to submit revised CCRA calculations reflecting the Commission's decisions in this matter. If the Commission doesn't

eliminate carrying charges, the Department recommends that the Commission approve the Company's proposed CCRA of \$0.00884,

The Department's final recommendations are that the Commission:

- 1) approve CenterPoint's proposed 2013 DSM financial incentive of \$10,890,131 to be included in the Company's CIP tracker account no sooner than the issue date of the Commission's *Order* in the present docket;
- 2) approve CenterPoint's 2013 CIP tracker account, as summarized in Table 1 in the Department's July 16, 2014 Comments;
- 3) discontinue approving carrying charges for under or over recovered balances in CenterPoint's CIP tracker account beginning in the month after the Commission issues its *Order* in this docket;
- 4) in the event that the Commission continues to allow the application of carrying charges to the over and under recovery of CIP tracker accounts, disallow application of the carrying charge to the Company's financial incentive;
- 5) require CenterPoint to provide revised CCRA calculations reflecting the Commission's *Order* in this matter; and
- 6) approve the following bill message:

The MPUC has approved a Conservation Cost Recovery Adjustment (CCRA) factor of \$[insert factor] per therm. This charge is used to fund energy conservation activities and has been added to your delivery charge. For more information please call 1-800-245-2377 or visit our website at www.centerpointenergy.com.

Sincerely,

/s/ MICHAEL N. ZAJICEK
Rates Analyst

MNZ/lt

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
Response Comments**

Docket No. G008/M-14-368

Dated this 29th day of August 2014

/s/Sharon Ferguson

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