



505 Nicollet Mall
PO Box 59038
Minneapolis, MN 55459-0038

PUBLIC DOCUMENT
Trade Secret Information has been Excised

November 1, 2024

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission 350
Metro Square Building
121 East Seventh Place, Suite 350
St. Paul, Minnesota 55101-2147

**Re: CenterPoint Energy 's Request for Change in Demand Units, Supplemental Filing
Docket No. G008/M-24-146**

Dear Mr. Seuffert:

On May 31, 2023, in Docket No. 23-221, the Company requested permission to 1) increase rate base in order to recover its Northern Natural Gas ("Northern" or "NNG") Contribution in Aid of Construction ("CIAC") for entitlements to be built for November 2023 in-service. Recovery would begin on January 1, 2024; 2) approval to update the NNG's discount rates to account for contractual changes that will occur on November 1, 2023; 3) approval to increase its per-unit demand costs on June 1, 2023 in order to reflect NNG's interim pre-settlement tariff rates put into place effective January 1, 2023 and additional tariff rate capacity added early spring 2023 and awarded during NNG's Generally Available Open Season; and 4) approval to update the Credit River additional capacity to be folded into our discounted rates beginning November 1, 2023.

On April 1, 2024, in Docket No. 24-146, the Company requested 1) approval of demand charges associated with the storage partnership transaction between Tenaska Gas Storage, LLC ("Tenaska") and East Cheyenne Gas Storage ("East Cheyenne") for firm storage services effective April 1, 2024, to March 31, 2029; 2) An update to the previously approved (Docket No. G008/M-18-462) Northern Natural Gas ("NNG") non-discounted rates to account for contractual changes; and 3) on November 1, 2024 to reflect updated seasonal reservation charges for swing gas supplies and may also supplement if additional capacity is acquired through capacity release.

Seasonal Reservation fees:

In the present filing, CenterPoint Energy has updated the Supplier Demand / Seasonal Swing Reservation for the 2024-2025 Winter season, which was unknown at the time of the April 1 Petition.

CenterPoint Energy updated its annual Supplier Demand Profile, which contains contracts for seasonal swing supplies. These expenses are incurred regardless of how much gas is called upon over the winter season, and costs are allocated 75% to Demand and 25% to Commodity. Changes will be reflected in the Company's November 2024 Purchased Gas Adjustment billing rates.

Additionally, NGPL storage demand was reduced approximately \$38,000 per contracted rates with NGPL.

The overall annual demand costs have decreased about \$382,000 when compared to the annual demand costs that were effective October 2024. The customer bill impact has decreased from \$1.4475/Dth to \$1.4443/Dth, or about \$0.0032/Dth. Annually for a residential customer using 89.0 Dekatherms, which is the final use-per-customer sales volume estimate authorized in the Company's 2021 Rate Case - Docket No. G008/GR-21-435, residential customers would see a \$0.28 decrease as of Nov. 1, 2024.

Estimate of Annual Demand Costs

October	89.0 x \$1.4475 =	\$128.83 per year before "smoothing" adjustment
November	89.0 x \$1.4443 =	\$128.54 per year before "smoothing"
Difference		\$0.28 per year

One of CenterPoint's main goals of its supply strategy is to prudently acquire additional storage to increase customers' overall price protection and price stabilization. This year the Company was successful in being awarded the following additional storage components:

- ANR Ventura Xpress Project Storage
 - 4.5 Bcf Storage Capacity
 - Maximum Deliverability of 75,000 Dth/day
 - Term of April 1, 2025 to March 31, 2040

Entitlement will be filed when new entitlement is acquired and set to impact customer bills.

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

The attached pages detail the implementation of CenterPoint Energy's 2024-2025 Heating Season Supply Plan. Please contact me at (612) 321-4677 if you have any questions.

Sincerely,

/s/ Donald W. Wynia

Donald W. Wynia

Regulatory Analyst

Regulatory Services

Donald.Wynia@CenterPointEnergy.com

CERTIFICATE OF SERVICE

Donald Wynia served the above Request for Change in Demand for 2024-2025 (Docket No. G-008/M-24-146 Supplement) to all persons at the addresses indicated on the attached list by having the document delivered by electronic filing.

/s/

Donald Wynia
Regulatory Analyst, Regulatory Services
CenterPoint Energy

Date: November 1, 2024

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

CenterPoint Energy Summary of Exhibits

EXHIBIT A Page 1 *Annual Demand Cost Calculation - Effective October 1, 2024
Page 2 *Annual Demand Cost Calculation – Proposed November 1,
2024

EXHIBIT B Additional Information Request from the Department of Commerce
Additional information pursuant to the Department's request to all utilities
concerning demand entitlement changes dated October 1, 1993.

B3 *Revised – Demand Profile
B4 Revised - Historic gas price change comparisons – Bill Impact

EXHIBIT C Supporting documentation
Page 1 - *Swing Supply Premium / Reservation
Page 2 - *Hedging Portfolio for 2024-2025 Winter Season. Provided as
required in Docket No. G008/M-23-360.

NOTE: “*” denotes Non-Public Document

Pipeline	Contract Type	Season	Rate Type	(DTH)	RATE	Number of Mo.	Annual Cost	Contract Start Date	Contract End Date	Contract Number	
Market Support											
Total NNG Demand Bill							\$139,710,639				
Total Viking Demand Bill											\$5,179,999
Total Trailblazer Demand Bill											\$760,415
SUPPLY DEMAND											
Allocation											
Total Supply Demand Costs							\$29,032,980				
CAPACITY RELEASE/ ADJUSTMENTS											
NNG Capacity Release (February 2021 - October 31, 2027)											
Annual AMA Payment											
Off-System Margin - per rate case 08-1075					UNITS	RATE	Months or Days	\$	-		
Total Capacity Release/Adjustments							(\$700,000)				
Plus: Propane Costs							\$364,447				
Annual Estimated Demand Expense							\$174,348,480				
Divided by: Annual Small Firm Demand Volume (2021 Rate Case Sales Volume- GR-21-435-TY)							1,195,457,049				
(Annual Estimate Demand Expense less Total Demand Large Firm)											
Small Firm Rate:							\$0.14475				
Design Day: Large Firm							112,155				
Design Day: Total							15,004,500				
Total Demand x (LV Design Day / Total Design Day)							\$1,303,213				
LV MDQ for Rate							84,480				
Monthly Per-Therm Rate							\$1.28552				

Demand Summary
considered Trade Secret

[illegible]

				Filed Nov 2022	Filed June 2023	Filed November 2023	Filed April 2024	Filed November 2024	Change from November 2023
	Pipeline	Contract Type	Season	Rate Type	22-306	23-221	23-221	24-146	24-146
1	[TRADE SECRET DATA BEGINS...								0
2									0
3									0
4									0
5									0
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17									0
18									0
19									0
20									
21									...Trade Secret Information Ends]
22			Total NNG Demand Winter		1,250,590	1,300,036	1,290,131	1,300,036	1,300,036
23			Total NNG Demand Summer		764,022	794,668	788,725	794,668	794,668
24			Total		2,014,612	2,094,704	2,078,856	2,094,704	2,094,704
25									0
26									
27	Northern Natural	Waterville/Medford - Included in NNG			50,000	50,000	50,000	50,000	50,000
28	Northern Natural	Backhaul	Winter		50,000	50,000	50,000	50,000	50,000
29	Northern Natural	SMS			30,000	30,000	30,000	30,000	30,000
30									
31	[TRADE SECRET DATA BEGINS...								0
32									0
33									0
34									0
35									
36									0
37									
38									0
39									...Trade Secret Information Ends]
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54									...Trade Secret Information Ends]
55	Total Capacity				1,520,284	1,551,692	1,541,787	1,569,730	1,569,730
56	Total Peak-Shaving Capacity/On-line Storage				271,000	271,000	271,000	271,000	271,000
57	Total Annual Transportation (12 month)				840,831	871,477	865,534	871,477	871,477
58	Total Seasonal Transportation (Adj for NNG/Viking overlap)				1,249,284	1,280,692	1,270,787	1,298,730	1,298,730
59	Peak Shaving as % of Total Capacity				17.8%	17.5%	17.6%	17.3%	17.3%
60	Annual Transportation as % of Total Capacity				55.3%	56.2%	56.1%	55.5%	55.5%
61	Seasonal Transportation as % of Total Capacity				82.2%	82.5%	82.4%	82.7%	82.7%
62	Annual and Seasonal Transportation as % of Total Transportation				59.8%	59.5%	59.5%	59.8%	59.8%
63									
64	Design Day				1,476,600	1,500,450	1,500,450	1,521,300	1,521,300
65	Physical Res				36,000	36,000	36,000	36,000	36,000
66	Total				1,512,600	1,536,450	1,536,450	1,557,300	1,557,300
67									
68	Pipeline				1,249,284	1,280,692	1,270,787	1,298,730	1,298,730
69	Peaking (LNG, Propane, Waterville)				271,000	271,000	271,000	271,000	271,000
70	Net Supply				1,520,284	1,551,692	1,541,787	1,569,730	1,569,730
71									
72	Avail Net Cap				7,684	15,242	5,337	12,430	12,430
73	%				0.5%	1.0%	0.3%	0.8%	0.8%
74									
75	Avail incl Physical				43,684	51,242	41,337	48,430	48,430
76	%				3.0%	3.4%	2.8%	3.2%	3.2%

	Last Rate Case (G008/GR-21-435)	Last Demand Change April 1, 2024 Demand Change (G008/M-24-146)	October 1, 2024 - PGA	November 1, 2024 Demand Change (G008/M-24-146)	Change From Last Rate Case	Change From Last Demand Change	Percent Change (%) From Most Recent PGA	Change (\$) From October to November
Residential								
Commodity Cost of Gas (WACOG) (4)	\$4.2905	\$1.6802	\$2.4740	\$2.6289	-38.73%	56.46%	6.26%	\$0.1549
Demand Cost of Gas (1)	\$1.2888	\$1.4475	\$1.4475	\$1.4443	12.07%	-0.22%	-0.22%	(\$0.0032)
Commodity Margin (2) (3) (5)	\$2.50430	\$2.9019	\$2.9019	\$2.9019	15.88%	0.00%	0.00%	\$0.0000
Total Cost of Gas	\$8.0836	\$6.0296	\$6.8234	\$6.9751	-13.71%	15.68%	2.22%	15.17%
Average Annual Usage (Dk)	89	89	89	89				
Average Annual Total Cost of Gas	\$719.44	\$536.63	\$607.28	\$620.78	-13.71%	15.68%	2.22%	\$13.5013
Average Annual Total Demand Cost of Gas								(\$0.2848)

	Last Rate Case (G008/GR-21-435)	Last Demand Change April 1, 2024 Demand Change (G008/M-24-146)	October 1, 2024 - PGA	November 1, 2024 Demand Change (G008/M-24-146)	Change From Last Rate Case	Change From Last Demand Change	Percent Change (%) From Most Recent PGA	Change (\$) From October to November
Commercial/Industrial Firm - A								
Commodity Cost of Gas (WACOG) (4)	\$4.2905	\$1.6802	\$2.4740	\$2.6289	-38.73%	56.46%	6.26%	\$0.1549
Demand Cost of Gas (1)	\$1.2888	\$1.4475	\$1.4475	\$1.4443	12.07%	-0.22%	-0.22%	(\$0.0032)
Commodity Margin (2) (3) (5)	\$2.6411	\$3.8897	\$3.8897	\$3.8897	47.28%	0.00%	0.00%	\$0.0000
Total Cost of Gas	\$8.2204	\$7.0174	\$7.8112	\$7.9629	(\$0.0313)	13.47%	1.94%	15.17%
Average Annual Usage (Dk)	81	81	81	81				
Average Annual Total Cost of Gas	\$664.21	\$567.01	\$631.14	\$644.99	-2.89%	13.75%	2.19%	\$13.8499
Average Annual Total Demand Cost of Gas								(\$0.26)

	Last Rate Case (G008/GR-21-435)	Last Demand Change April 1, 2024 Demand Change (G008/M-24-146)	October 1, 2024 - PGA	November 1, 2024 Demand Change (G008/M-24-146)	Change From Last Rate Case	Change From Last Demand Change	Percent Change (%) From Most Recent PGA	Change (\$) From October to November
Commercial/Industrial Firm - B								
Commodity Cost of Gas (WACOG) (4)	\$4.2905	\$1.6802	\$2.4740	\$2.6289	-38.73%	56.46%	6.26%	\$0.1549
Demand Cost of Gas (1)	\$1.2888	\$1.4475	\$1.4475	\$1.4443	12.07%	-0.22%	-0.22%	(\$0.0032)
Commodity Margin (2) (3) (5)	\$2.0380	\$2.4691	\$2.4691	\$2.4691	21.15%	0.00%	0.00%	\$0.0000
Total Cost of Gas	\$7.6173	\$5.5968	\$6.3906	\$6.5423	-14.11%	16.89%	2.37%	15.17%
Average Annual Usage (Dk)	730	730	730	731				
Average Annual Total Cost of Gas	\$5,560.63	\$4,085.66	\$4,665.14	\$4,782.42	-13.99%	17.05%	2.51%	\$117.2833
Average Annual Total Demand Cost of Gas								(\$2.34)

	Last Rate Case (G008/GR-21-435)	Last Demand Change April 1, 2024 Demand Change (G008/M-24-146)	October 1, 2024 - PGA	November 1, 2024 Demand Change (G008/M-24-146)	Change From Last Rate Case	Change From Last Demand Change	Percent Change (%) From Most Recent PGA	Change (\$) From October to November
Commercial/Industrial Firm - C								
Commodity Cost of Gas (WACOG) (4)	\$4.2905	\$1.6802	\$2.4740	\$2.6289	-38.73%	56.46%	6.26%	\$0.1549
Demand Cost of Gas (1)	\$1.2888	\$1.4475	\$1.4475	\$1.4443	12.07%	-0.22%	-0.22%	(\$0.0032)
Commodity Margin (2) (3) (5)	\$1.7360	\$1.9325	\$1.9325	\$1.9325	11.32%	0.00%	0.00%	\$0.0000
Total Cost of Gas	\$7.3153	\$5.0602	\$5.8540	\$6.0057	-17.90%	18.69%	2.59%	15.17%
Average Annual Usage (Dk)	12,076	12,076	12,076	12,076				
Average Annual Total Cost of Gas	\$88,336.64	\$61,104.95	\$70,690.56	\$72,522.43	-17.90%	18.69%	2.59%	\$1,831.87
Average Annual Total Demand Cost of Gas								(\$38.64)

	Last Rate Case (G008/GR-21-435)	Last Demand Change April 1, 2024 Demand Change (G008/M-24-146)	October 1, 2024 - PGA	November 1, 2024 Demand Change (G008/M-24-146)	Change From Last Rate Case	Change From Last Demand Change	Percent Change (%) From Most Recent PGA	Change (\$) From October to November
Large General Service								
Commodity Cost of Gas (WACOG) (4)	\$4.2905	\$3.1141	\$2.4740	\$2.6289	-38.73%	-15.58%	6.26%	\$0.1549
Commodity Margin (2) (3) (5)	\$0.8301	\$1.0029	\$1.0029	\$1.0029	20.82%	0.00%	0.00%	\$0.0000
Commodity Charges	\$5.1206	\$4.1170	\$3.4769	\$3.6318	-29.07%	-11.79%	4.46%	\$0.1549
LV Demand Cost of Gas (1)	\$9.9733	\$12.3733	\$12.8552	\$12.8270	28.61%	3.67%	-0.22%	(\$0.0282)
LV Demand Delivery Charge	\$4.8303	\$6.3303	\$6.3303	\$6.3303	31.05%	0.00%	0.00%	\$0.0000
Average Annual Usage (Dk)	47,751	47,751	47,751	47,751				
Average Daily MDQ Usage (Dk)	7,282	8,448	8,448	8,448				-
Average Annual Total Cost of Gas	\$352,316	\$423,966	\$328,106	\$335,265		-20.92%	2.18%	\$7,158.47
Average Annual Total Demand Cost of Gas								(\$238.23)

Summary	Commodity	Demand	Demand	Demand		Total	Total
Change from most recent PGA	Change	Change	Change	Change		Change	Change
Customer Class	<u>(\$/Dk)</u>	<u>(Percent)</u>	<u>(\$/DK)</u>	<u>(\$/DK)</u>		<u>(\$/Dk)</u>	<u>(Percent)</u>
Residential	\$0.1549	-0.22%	-\$0.0032	\$0.0000		\$13.50	2.22%
Commercial/Industrial Firm A	\$0.1549	-0.22%	-\$0.0032	\$0.0000		\$13.85	2.19%
Commercial/Industrial Firm B	\$0.1549	-0.22%	-\$0.0032	\$0.0000		\$117.28	2.51%
Commercial/Industrial Firm C	\$0.1549	-0.22%	-\$0.0032	\$0.0000		\$1,831.87	2.59%
Large General Service	\$0.1549	-0.22%	-\$0.0282	\$0.0000		\$7,158.47	2.18%

(1) Does not include Demand Smoothing Adjustment
(2) Does not reflect Decoupling, GAP, Interim or GCR Factors.
(3) 2021 Rate Case - tariff value for Last Rate Case and Last Demand Change. Reflect base rate plus CCRA
(4) Actual WACOG for historical timeframes / 2021 Rate Case Base value in Settlement
(5) Actual Billed for historical (Base+CCRA) / 2021 Rate Case Base settled tariff value and CCRA



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