

August 14, 2017

Daniel P. Wolf  
Executive Director  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
Saint Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. G008/MR-17-591

Dear Mr. Wolf:

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

A *Petition* by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas (CenterPoint or the Company) to the Minnesota Public Utilities Commission (Commission) requesting approval to implement new base gas costs (Purchased Gas Adjustment [PGA] zero-out) to coincide with the implementation of interim rates in its general rate case filing, Docket No. G008/GR-17-285.

The *Petition* was filed on August 2, 2017 by:

Marie M. Doyle  
Rates Analyst  
CenterPoint Energy  
505 Nicollet Mall  
Minneapolis, Minnesota 55402

Based on its review of the Company's *Petition*, the Department recommends that the Commission **approve** CenterPoint's base cost of gas filing subject to CenterPoint providing Attachment 1, Attachment 2, and Attachment 3 without rounding.

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

Sincerely,

/s/ DANIEL BECKETT  
Rates Analyst  
651-539-1874

/s/ ADAM J. HEINEN  
Rates Analyst  
651-539-1825

DB/AJH/lt  
Attachment



## Before the Minnesota Public Utilities Commission

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### Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. G008/MR-17-591

#### I. SUMMARY OF CENTERPOINT ENERGY'S PROPOSAL

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas (CenterPoint or the Company), requests that the Minnesota Public Utilities Commission (Commission) approve a new base cost of gas to coincide with the proposed October 1, 2017 implementation of interim rates requested in its general rate case Docket No. G008/GR-17-285. The Minnesota Department of Commerce, Division of Energy Resources' (Department) analysis of CenterPoint's *Petition* is presented below.

#### II. THE DEPARTMENT'S ANALYSIS

Minnesota Rules part 7825.2700, subpart 2, requires a utility to petition for a new base cost of gas, submitted as a miscellaneous rate change, to coincide with the implementation of interim rates during a general rate proceeding. This Rule requires that "The base cost of gas must separately state the commodity base cost and the demand base cost components for each class." Through review of CenterPoint's *Petition*, the Department concludes that the Company has complied with these requirements through Attachment 5 in the *Petition*. The Department discusses CenterPoint's demand and commodity costs separately below.

##### A. DEMAND GAS COSTS

The Department reviewed CenterPoint's filing for consistency between the calculations in the rate case and those in the base cost of gas filing. The Department's analysis indicates that the information is generally consistent between the rate case and base cost of gas filings. CenterPoint calculated its demand cost of gas based, in most part, on the demand entitlement units and costs that are estimated to be charged in the Company's November 2017 Purchased Gas Adjustment (PGA) filing. These estimated demand costs are representative of the entitlement levels and costs proposed by the Company in Docket No. G008/M-17-533 (2017-2018 Demand Entitlement Filing). The Department notes that the demand costs are slightly different between the estimated November 2017 PGA and the rate case and base cost of gas filings because the rate case and base cost of gas filings reflect updated propane costs, and do not contain capacity release adjustments, which are included in the monthly PGA filings.

The Department notes that CenterPoint used two slightly different demand cost figures in the rate case and base cost of filings. CenterPoint reported demand costs of \$85,956,914<sup>1</sup> and also reported test-year demand costs of \$85,957,000.<sup>2</sup> The Department observed a similar instance in the Company's 2015 base cost of gas filing (Docket No. G008/MR-15-728) and requested that CenterPoint clarify the reason for the difference in cost in that proceeding. CenterPoint responded in its August 24, 2015 *Reply Comments* in Docket No. G008/MR-15-728 that the small difference was related to a rounding technique. The Commission ultimately approved the Company's proposed base cost of gas filing. Although the Company rounded correctly in this docket, the Department recommends that the Commission set CenterPoint's base cost of gas using an exact demand cost figure, \$85,956,418, which is representative of expected demand cost recovery during the test year. This figure is calculated by adding together the annual small volume firm costs (107,437,552 Mcf x \$0.7984 = \$85,778,142) and the annual large firm demand costs (31,784 Mcf x \$5.060 = \$178,276).<sup>3</sup>

#### B. COMMODITY GAS COSTS

CenterPoint estimated its commodity costs based on forecasted Henry Hub wellhead prices, forecasted basis point differentials for delivery of natural gas to Ventura, estimates of lost and unaccounted for gas, and pipeline transportation charges.<sup>4</sup> The Company's price forecasts were based on estimated New York Mercantile Exchange (NYMEX) Henry Hub gas prices over the period April 2017 to September 2018 as provided by CenterPoint's Gas Supply Group. The Department compared these estimated commodity cost rates to current NYMEX market expectations and, at this time, the rate estimates do not appear to be inappropriate. However, the Department notes that these estimates should be compared to actual gas costs when final rates are set, when the Commission may wish to consider whether any adjustments to gas costs and corresponding effects on other costs in the rate case, should be reflected in final rates.

After estimating commodity costs for its customers, and accounting for lost gas and pipeline transportation charges, CenterPoint's total commodity cost recovery amount was calculated by multiplying the rounded proposed test-year sales estimates in its rate case filing (121,597 thousand Mcf) by the commodity cost rates presented in Attachment 3 of its base cost of gas filing. The rounded total commodity costs CenterPoint included in its rate case filing are identified in Attachment 3 of its base cost of gas filing as \$436,448,000. This cost figure, which is calculated based on rounded sales, differs from the \$436,444,416 commodity figure included in CenterPoint's rate case filing Kirk R. Nesvig, Workpaper Volume 2, Schedule 38, Workpaper 2. The Department notes that the test-year sales and commodity costs presented in the Company's *Petition*, Attachment 3 do not match the figures presented in the rate case filing.

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<sup>1</sup> See Docket No. G008/GR-17-285: Ex. \_\_\_\_ (KRN-D), Schedule 38, Page 2 of 3 and Attachment 2 in this *Petition*.

<sup>2</sup> *Id.*

<sup>3</sup> *Petition*, Attachment 2.

<sup>4</sup> See Docket No. G008/GR-17-285: Ex. \_\_\_\_ (KRN-WP), Schedule 38, Workpaper 4.

The Department also notes an inconsistency in the Company's rate case schedules. Specifically, the total commodity figure of \$436,444,416 is calculated using the summation of monthly total commodity cost figures (monthly cost figures are calculated using estimated monthly gas costs), while the rounded commodity figure of \$436,448,000 is calculated using the test-year average commodity cost figure of \$3.5893 multiplied by total test-year sales of 121,596,942.<sup>5</sup> Since the base cost of gas is a fixed rate in the tariff, the Department concludes that the calculation resulting in the rounded figure of \$436,448,000 in Attachment 3 of its *Petition* is the most appropriate for use as the commodity cost of gas figure. Since this commodity cost figure is only shown as a rounded amount, the Department recommends that CenterPoint provide, in *Reply Comments*, its Attachment 3 without rounding.

### C. TOTAL GAS COSTS

When the test-year demand gas cost (\$85,956,418) and test-year commodity gas cost (\$436,447,904) figures in this filing are added together, it translates into total gas costs of \$522,404,322. While reviewing the total costs included in the rate case filing, the Department observed that CenterPoint used the rounded, or cost incurred, demand cost figure in its calculation.<sup>6</sup> The rounded, or cost incurred, demand figure does not represent the rates that will be charged during the test-year; therefore, the Department concludes that the rate case schedules should be updated to correctly reflect demand costs; this recommendation is made in the Department's *Completeness Comments* in Docket No. G008/GR-17-285. In terms of the cost figures in the base cost of gas filing, the Department concludes that they are appropriate and reasonable, with the clarification that the rounded figures not be used to set the base cost of gas. The Department does note, however, that the cost figures in Attachment 1 of the *Petition* are rounded; as such, the Department recommends that CenterPoint provide this attachment updated without rounding in its *Reply Comments*.

### III. THE DEPARTMENT'S RECOMMENDATIONS

Based on its review of the Company's *Petition*, the Department recommends that the Commission approve CenterPoint's base cost of gas filing subject to the provision of the *Petition's* Attachment 1, Attachment 2, and Attachment 3 without rounding.

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<sup>5</sup> The unrounded commodity figure using total test-year sales and commodity cost is \$436,447,904.

<sup>6</sup> Exhibit \_\_\_\_ (KRN-WP), Schedule 34, Workpaper 3, Page 9 of 9.

## **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/MR-17-591**

**Dated this 14<sup>th</sup> day of August 2017**

**/s/Sharon Ferguson**

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