

December 8, 2025

**PUBLIC DOCUMENT**

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

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

Dear Ms. Bergman:

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 a Petition by CenterPoint Energy of Minnesota, for Approval of Rule Variances to Recover High Natural Gas Costs from February 2021*

CenterPoint filed its 2025 annual compliance filing in this proceeding on August 1, 2025.

The Department recommends the Minnesota Public Utilities Commission **approve** CenterPoint Energy of Minnesota's 2025 annual compliance filing and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. Sydnie Lieb  
Assistant Commissioner of Energy Regulatory Analysis

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Attachment



## Before the Minnesota Public Utilities Commission

### PUBLIC Comments of the Minnesota Department of Commerce

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

#### I. INTRODUCTION

The Minnesota Department of Commerce, Energy Division (Department) provides comments on CenterPoint Energy of Minnesota's (CenterPoint, CPE, or the Company) annual compliance filing submitted August 1, 2025, for these two dockets. These two dockets can be thought of as two aspects of the Minnesota Public Utilities Commission's (Commission, MPUC) response to the costs associated with the natural gas market's February 2021 Pricing Event (PE) during Winter Storm Uri. Docket No. G008/M-21-138 focused primarily on the recovery of the costs resulting from the February 2021 Pricing Event.<sup>1</sup> Docket No. G999/CI-21-135 was more concerned with CPE's efforts to improve its ability to mitigate the risk of short-term price spikes on a forward-looking basis.

CenterPoint's 2025 annual compliance filing (ACF) was less complicated than its 2024 ACF. Natural gas wholesale prices across Minnesota and the Upper Midwest during the 2024-2025 heating season did not demonstrate the short-term price volatility experienced during pricing event that occurred in January 2024. Thus, CPE didn't have to comply with the additional reporting requirements regarding rapid price increases included in the Commission's 2024 ACF Order which was issued June 2, 2025, and superseded those included in the Minnesota Public Utilities Commission's (Commission) February 17<sup>th</sup>, 2023, Order.<sup>2,3</sup>

The Company did provide information regarding the sixteen relevant reporting requirements the Commission listed in those two orders in its 2025 ACF.

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<sup>1</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of CenterPoint Natural Gas Co., a Division of Montana-Dakota Utilities for Rule Variances to Recover High Natural Gas Costs from February 2021*, MPUC, Order, August 30, 2021, Docket Nos. G999/CI-21-135 and G008/M-21-138, (eDockets) [20218-177548-04](#), issued August 30, 2021 (hereinafter "August 30<sup>th</sup> Order").

<sup>2</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of CenterPoint Natural Gas Co., a Division of Montana-Dakota Utilities for Rule Variances to Recover High Natural Gas Costs from February 2021*, MPUC, Order, February 17, 2023, Docket Nos. G999/CI-21-135 and G008/M-21-138, (eDockets) [20232-193249-01](#), issued February 17, 2023, at Order Pts. 3-11 (hereinafter "February 17<sup>th</sup> Order").

<sup>3</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of CenterPoint Natural Gas Co., a Division of Montana-Dakota Utilities for Rule Variances to Recover High Natural Gas Costs from February 2021*, MPUC, Order, February 17, 2023, Docket Nos. G999/CI-21-135 and G008/M-21-138, (eDockets) [20256-219485-01](#), issued June 2, 2025, at Order Pts. 5-7 (hereinafter "June 2<sup>nd</sup> Order").

The Commission issued a Notice of Comment (NOC) for CPE’s 2025 ACF on August 11<sup>th</sup>, 2025. The Commission included the following questions in the NOC:

- Does the natural gas utilities annual compliance filings comply with the February 2023 and June 2025 Commission’s Orders?
- Are Great Plains’ conclusions of its voluntary conservation report reasonable?
- Are the gas utilities’ reports regarding interruptible customer compliance and incorporation of curtailment calls reasonable?
- Are the gas utilities’ reports regarding hedging, procurement and customer communication strategies achieving reasonable savings for ratepayers?
- 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 BACKGROUND

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 2021 Pricing Event).
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. <sup>4</sup>
October 19, 2022	The Commission issued its ORDER DISALLOWING CERTAIN NATURAL GAS COSTS AND REQUIRING FURTHER ACTION. <sup>5</sup>
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. <sup>6</sup>
August 1, 2023	CPE filed its 2023 ACF. <sup>7</sup>

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<sup>4</sup> August 30<sup>th</sup> Order, (eDockets) [20218-177548-04](#).

<sup>5</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery Process for Cost Impacts Due to February Extreme Market Conditions*, MPUC, Order, October 19, 2022, Docket Nos. G999/CI-21-135 and G008/M-21-138, (eDockets) [202210-189967-02](#).

<sup>6</sup> February 17<sup>th</sup> Order, (eDockets) [20232-193249-01](#).

<sup>7</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery Process for Cost Impacts Due to February Extreme Market Conditions*, CenterPoint, Compliance, August 1, 2023, Docket Nos. G999/CI-21-135 and G008/M-21-138, (eDockets) [20248-209196-03](#), (hereinafter “2023 ACF”).

November 1, 2023	The Department provided comments on CenterPoint 2023 ACF. <sup>8</sup>
January 26, 2024	CenterPoint submitted a compliance filing on the cost impacts on gas commodity purchases due to extreme market conditions between January 12 <sup>th</sup> and 16 <sup>th</sup> , 2024. <sup>9</sup>
March 29, 2024	CenterPoint filed its final quarterly compliance
July 30, 2024	The Commission issued an order accepting and approving the Company's 2023 ACF. <sup>10</sup>
August 1, 2024	The Company filed its 2024 ACF. <sup>11</sup>
August 29, 2024	The Commission issued a Notice of Comment period for CenterPoint's 2024 ACF. <sup>12</sup>
November 27 -December 2, 2024	The Department and the Office of the Attorney General Residential Utilities Division (OAG-RUD), provided comments on CPE's 2024 ACF. <sup>13, 14</sup>

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<sup>8</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery Process for Cost Impacts Due to February Extreme Market Conditions*, Department, Comments, November 1, 2023, Docket Nos. G999/CI-21-135 and G008/M-21-138, (eDockets) [202311-200161-01](#), (hereinafter "2023 Department Comments").

<sup>9</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery Process for Cost Impacts Due to February Extreme Market Conditions*, CenterPoint, Compliance, January 26, 2024, Docket Nos. G999/CI-21-135 and G008/M-21-138, (eDockets) [20241-202747-01](#), (hereinafter "January 2024 Price Spike Filing").

<sup>10</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of CenterPoint Energy, for Approval of a Recovery Process for Cost Impacts Due to February Extreme Market Conditions* MPUC, Order, July 30, 2024, Docket Nos. G999/CI-21-135 and G008/M-21-138, (eDockets) [20247-209084-02](#), (hereinafter "Order Approving 2023 ACF").

<sup>11</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery Process for Cost Impacts Due to February Extreme Market Conditions*, CenterPoint, Compliance, August 1, 2024, Docket Nos. G999/CI-21-135 and G008/M-21-138, (eDockets) [20248-209196-03](#), (hereinafter "2024 ACF").

<sup>12</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery Process for Cost Impacts Due to February Extreme Market Conditions*, MPUC, Notice, August 29, 2024, Docket Nos. G999/CI-21-135 and G008/M-21-138, (eDockets) [20248-209854-01](#), (hereinafter "2024 Commission Notice").

<sup>13</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery Process for Cost Impacts Due to February Extreme Market Conditions*, OAG-RUD, Comments, December 2, 2024, Docket Nos. G999/CI-21-135 and G008/M-21-138, (eDockets) [202412-212596-02](#), (hereinafter "OAG-RUD 2024 Comments").

<sup>14</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery Process for Cost Impacts Due to February Extreme Market Conditions*, Department, Comments, November 27, 2024, Docket Nos. G999/CI-21-135 and G008/M-21-138, (eDockets) [202411-212529-02](#), (hereinafter "Department 2024 Comments").

December 6 - 12, 2024	CenterPoint and the Citizens Utility Board of Minnesota (CUB) provided reply comments. <sup>15, 16</sup>
June 2, 2025	The Commission issued an order accepting and approving the Company's 2024 ACF. <sup>17</sup>
August 1, 2025	The Company filed its 2025 ACF. <sup>18</sup>
August 11, 2025	The Commission issued a Notice of Comment period for CenterPoint's 2025 ACF. <sup>19</sup>
September 30, 2025	CenterPoint filed its most recent quarterly compliance and tracking filing for the surcharge recovery. <sup>20</sup>

### III. DEPARTMENT ANALYSIS

The focus of the Department's analysis are based on the Commission's questions included in its NOC. In addition, the Department reconciles the information in the Company's 2025 ACF with the ACF reporting requirements included in the Commission's February 17<sup>th</sup> and June 2<sup>nd</sup> Orders.

#### A. RESPONSES TO COMMISSION'S QUESTIONS

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

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<sup>15</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery Process for Cost Impacts Due to February Extreme Market Conditions*, CenterPoint, Reply Comments, December 12, 2024, Docket Nos. G999/CI-21-135 and G008/M-21-138, (eDockets) [202412-212774-01](#), (hereinafter "2024 CPE Reply Comments").

<sup>16</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery Process for Cost Impacts Due to February Extreme Market Conditions*, CUB, Reply Comments, December 12, 2024, Docket Nos. G999/CI-21-135 and G008/M-21-138, (eDockets) [202412-212947-02](#), (hereinafter "2024 CUB Reply Comments").

<sup>17</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery Process for Cost Impacts Due to February Extreme Market Conditions*, MPUC, Order, June 2, 2025, Docket Nos. G999/CI-21-135 and G008/M-21-138, (eDockets) [20256-2190485-01](#), (hereinafter "Order Approving 2024 ACF").

<sup>18</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery Process for Cost Impacts Due to February Extreme Market Conditions*, CenterPoint, Compliance, August 1, 2025, Docket Nos. G999/CI-21-135 and G008/M-21-138, (eDockets) [20258-221664-01](#), (hereinafter "2025 ACF").

<sup>19</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery Process for Cost Impacts Due to February Extreme Market Conditions*, MPUC, Notice, August 11, 2025, Docket Nos. G999/CI-21-135 and G008/M-21-138, (eDockets) [20258-221932-01](#), (hereinafter "2025 Commission Notice").

<sup>20</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery Process for Cost Impacts Due to February Extreme Market Conditions*, CenterPoint, Compliance, September 30, 2025, Docket Nos. G999/CI-21-135 and G008/M-21-138, (eDockets) [20259-223431-01](#), (hereinafter "September 2025 Surcharge Recovery Filing").

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

The Department concludes that CenterPoint's 2025 Annual Compliance Filing complies with the reporting requirements included in the Commission's Orders related to this proceeding.

*A.2. Are Great Plains' conclusions of its voluntary conservation report reasonable?*

The topic is not relevant to CPE's 2025 ACF but will be addressed in the Department's Great Plains comments.

*A.3. Are the gas utilities' reports regarding interruptible customer compliance and incorporation of curtailment calls reasonable?*

The Department's review suggests CenterPoint's reports regarding interruptible customer compliance and incorporation of curtailment calls are reasonable.

*A.4. Are the natural gas utilities' reports regarding hedging, procurement and customer communication strategies achieving reasonable savings for ratepayers?*

The Department's review suggests that CenterPoint procurement and communications strategies are providing value and achieving reasonable potential savings to ratepayers.

*A.5. Should the compliance filings be accepted and approved?*

The Department recommends the Commission accept and approve CenterPoint's 2025 ACF.

*A.6. Should the Commission make any changes to future compliance filing requirements?*

The Department didn't identify any future changes but will defer on making a recommendation to Commission until it has the opportunity review comments from other parties.

*A.7. Are there any issues or concerns related to this matter?*

The Department didn't identify any additional issues or concerns related to this matter.

**B. SUMMARY OF CENTERPOINT'S GAS PRACTICES COMMENTS**

*B.1. Background and Organization*

In a Notice of Comment issued on August 23, 2022, the Commission asked the four affected gas utilities to respond to the two following topics:

- Each impacted natural gas utility is required to review its gas contracting, purchasing, hedging, storage, peak-shaving, interruptible, customer communications and other relevant practices and, by September 15, 2022, file a plan in its respective docket and in CI-21-135 on how it will

Analyst assigned: John Kundert

improve or modify its practices to protect ratepayers from extraordinary natural gas price spikes in the future.

- As part of its plan, each utility shall identify the general timeframe in which it will implement the modifications, and, if the proposed change requires modification of tariff, proposed tariff language.<sup>21</sup>

In its comments responding to that NOC, CenterPoint identified two sub-categories under this topic – procurement practices and customer communications.

### *B.2. Procurement Practices*

As the term suggests, procurement practices focus on contract-related supply options which include baseload purchases, storage and swing-supply/daily purchases.<sup>22</sup>

CenterPoint identified six procurement-related changes:

- 1) An increase in First-of-Month (FOM) index purchases.
- 2) An increase in Hedged Baseload purchases.
- 3) Increased geographic supplier diversity.
- 4) Optimizing its existing hedging program.
- 5) Increasing the diversity of its hedging program.
- 6) Executing longer-term hedges.

From an economic perspective, the Department would classify those six changes as being related to the supply of natural gas.

### *B.3. Customer Communications*

CenterPoint identified three customer communications-related changes:

- 1) Heating season cold weather communications campaign.
- 2) Conservation Improvement Program (“CIP”) campaign.
- 3) Business customer engagement.
- 4) Interruptible Curtailments

Those four topics could be classified as being related to the demand for natural gas.

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<sup>21</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers and In the Matter of the Petition of CenterPoint*, MPUC, Notice, August 23, 2022, Docket Nos. G999/CI-21-135 and G008/M-21-138, (eDockets) [20228-188522-05](#), (hereinafter “2022 Commission Notice”).

<sup>22</sup> 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. Gas in Storage also has a fixed price. The prices of daily (spot) and swing contracts are subject to daily pricing. The gas price is determined by the average of those daily prices. These contract type represents the riskiest of those discussed.

These modified practices formed the basis for the annual compliance filing reporting requirements included in the Commission’s February 17<sup>th</sup> Order. The Department’s analysis separates the Commission’s current reporting requirements into those two general categories.

**C. ANALYSIS**

**C.1. Supply-Related Changes**

The Department’s analysis/review summarizes the Company’s efforts regarding those modifications since the Commission issued its February 17<sup>th</sup> and June 2<sup>nd</sup> Orders.

**C.1.1. Gas Supply Planning**

**a. Order Points 5, and 6 of February 17<sup>th</sup> Order<sup>23</sup>**

The Department’s review is summarized in Tables 1 and 2. Table 1 compares CPE’s winter heating season procurement strategies for 2020-2021 and 2024-2025.

**Table 1 – Comparison of CPE’s Winter Procurement Strategies for 2020-2021 and 2024-2025 Winter Heating Seasons<sup>24</sup>**

Line No.	Purchases	2020-2021		2024-2025		Difference	
		Dth	Percent	Dth	Percent	2020 to 2024	
1.	Baseload/Hdgd	23,000,000	22.0%	23,000,000	22.5%	-	0%
2.	Baseload/FOM	21,050,000	20.2%	30,000,000	29.3%	8,950,000	43%
3.	Daily/Swing	33,339,302	32.0%	19,300,000	18.8%	(14,039,302)	-42%
4.	Storage	26,872,151	25.8%	30,100,000	29.4%	3,227,849	12%
5.	Peaking	75,123	0.1%	-	0.0%	(75,123)	-100%
6.	Total System Purchases	104,336,576	100%	102,400,000	100%	(1,936,576)	-2%
7.	Transport	18,120,000		23,400,000		5,280,000	29%
8.	Total System Supply	122,456,576		125,800,000		3,343,424	3%
9.	Total Price Stabilization	49,947,274	47.9%	53,100,000	52%	3,152,726	6%

CPE increased the number of dekatherms covered by price stabilization by 3.1 million Dths. or 6% between 2020 and 2024. Over that same period, the Winter season quantity of dekatherms forecasted to be purchased for firm sales customers decreased approximately 1.9 million Dths. or 2 percent.

<sup>23</sup> These three Order Points are the following: 5. The gas utilities in this docket shall continue exploring the availability and cost of contracting , hedging and supply options that would provide better protection against price spikes and 6. The gas utilities in this docket shall consider variations to, and explain their plans to, incorporate a greater degree of baseload purchases. 12. CenterPoint shall use the circumstances of the event, the prevailing winter weather, and the status of its fuel inventory to inform its peak-shaving dispatch decisions.

<sup>24</sup> See **TRADE SECRET** Attachment DOC-1-C.

Table 2 compares the 2024-2025 and 2025-2026 Winter heating season plans.

**Table 2 – Comparison of CPE’s Winter Procurement Strategies for 2024-2025 and 2025-2026 Winter Heating Seasons**

Line No.	Purchases	2024-2025		2025-2026		Difference	
		Winter Plan		Winter Plan			
		Dth	Percent	Dth	Percent	Dth	Percent
1.	Baseload/Hdgd	23,000,050	22.5%	12,000,050	11.8%	(11,000,000)	-48%
2.	Baseload/FOM	29,969,950	29.3%	31,104,950	30.5%	1,135,000	4%
3.	Daily/Swing	19,290,797	18.8%	19,655,606	19.3%	364,809	2%
4.	Storage	30,130,169	29.4%	39,216,972	38.5%	9,086,803	30%
5.	Peaking	-	0.0%	-	0.0%	-	NA
6.	Total System Purchases	102,390,966	100%	101,977,578	100%	(413,388)	-0.4%
7.	Transport	23,405,000		23,405,000		-	0%
8.	Total System Supply	125,795,966		125,382,578		(413,388)	0%
9.	Total Price Stabilization	53,130,219	52%	51,217,022	50%	(1,913,197)	-4%

Table 2 shows CenterPoint decreasing the supply of Baseload Index priced contracts by 11.0 million Dths. or 48% for the 2025-2026 heating season while increasing the amount of supply it purchases using Daily/Swing Supply by 360,000 dekatherms or 2 percent and increasing Baseload/FOM by 1.1 million Dths or 4%. The amount of gas in storage increased by 9.1 million Dths. or 30 percent.<sup>25</sup>

The 2025-2026 GPP results in 50 percent of the Company’s annual volumes being classified as having its prices “stabilized”. While slightly less than the 52% included in that category for the 2024-2025 GPP, the Department notes the 50% figure is still higher than the 2020-2021 figure of 47.9 percent. The Department also notes that CPE defines the formula for calculating the amount of natural gas that is “price stabilized” is the sum of the baseload hedged, storage, and peaking volumes. Thus, the 43% increase in the FOM purchases for the 2025-2026 GPP is not considered in that comparison. FOM purchases do minimize the risk of short-term price spikes, but that risk mitigation is not identified in the price stabilization volumes or percentages.

In information request (IR) 91, the Department asked if the Company had made any significant changes to its processes for incorporating more baseload purchases into its winter season supply over the past 12 months. The Company responded:<sup>26</sup>

<sup>25</sup> The storage agreements responsible for this increase are discussed and reviewed in the Company’ 2025-2026 Demand Entitlement filing, Docket No. G008/M-25-72.

<sup>26</sup> See Attachment DOC-2-C.

One of the many action items taken by the Company since Winter Storm Uri was to evaluate and increase the portion of its planned supply requirements tied to a baseload first-of-the-month (FOM) prices. . . . the percentage of planned supply requirements to be met by baseload purchases has increased from 5-10% since the 2020-2021 winter season delivering great price stability and reducing exposure to the gas daily markets.

Hence, the Department concludes CenterPoint has complied with the Commission’s Order Points 5 and 6 of the Commission’s February 17<sup>th</sup> Order and has fulfilled that requirement in its 2025 ACF.

*C.1.2. Storage Inventory Management and Peak-Shaving Dispatch*

*a. Order Points 7, and 12 of February 17<sup>th</sup> Order*

In Order Points 7 and 12 of the Commission’s February 17<sup>th</sup> Order which the Commission identified two requirements for CenterPoint related to this topic. Order Point 7 stated: “CenterPoint shall explore modifications to storage inventory management that could preserve withdrawal capabilities for later in the winter”. Order Point 12 included the requirement that: “CenterPoint shall use the circumstances of the event, the prevailing winter, and the status of its fuel inventory to inform its peak-shaving dispatch decisions”. The Department reviews the Company’s efforts to comply with these two reporting requirements by comparing the Company’s use of those two supply-side resources during the 2021 and 2024 pricing events.

*i. February 2021 and January 2024 Pricing Events – Comparison*

The Department included an analysis of the difference in volumes and costs for those two pricing events in its 2024 comments on CPE’s ACF.<sup>27</sup> The Department noted:

The percentage of supply sourced from storage increased from 25% in 2021<sup>28</sup> to 36% in 2024.<sup>29</sup> The percentage of supply derived from Liquefied Natural Gas (LNG) went from 1% in 2021<sup>30</sup> to 4.0% in 2024<sup>31</sup> the percentage of propane increased to 0.4% in 2024<sup>32</sup> from 0.0% in 2021<sup>33</sup> .

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<sup>27</sup> Department 2024 Comments, p. 14-16.

<sup>28</sup> *Ibid.*

<sup>29</sup> January 2024 Price Spike Filing, p. 2.

<sup>30</sup> Department 2024 Comments, p. 15.

<sup>31</sup> January 2024 Price Spike Filing, p. 2.

<sup>32</sup> *Ibid.*

<sup>33</sup> Department 2024 Comments, p. 15.

. . . These increases are consistent with CenterPoint’s efforts to mitigate the risk of short-term prices spikes.

This comparison demonstrates how the Company has modified its storage inventory management and peak-shaving dispatch protocols such that the use of those two supply-side resources mitigated more of the short-term price spike risk during the January 2024 PE than they did during the 2021 Pricing Event.

IR 92 asked the Company about any modifications to Storage Inventory Management over the past 12 months.<sup>34</sup> The Company responded:

CenterPoint Energy’s storage management process is guided by initiatives. . . . These initiatives focus on optimizing storage utilization to deliver price stability, ensure reliable supply during peak demand and enhance system flexibility. By strategically managing injection and withdrawal schedules, diversifying storage assets and leveraging advanced analytics, the Company aims to minimize market volatility impacts and provide predictable, affordable service to customers.

The Department’s analysis of the Company’s responses to these two pricing events combined with the Company’s response to IR 92 suggests that CenterPoint has implemented changes to its storage and peak-shaving resources that are consistent with the Commission’s directives and have complied with the reporting requirements contained in Order Points 7 and 12 of the February 17<sup>th</sup> Order.

### *C.1.3. Supply Reserve Margin*

In Order Point 8 of the Commission’s February 17<sup>th</sup> Order the Commission stated: “The gas utilities in this docket shall commit to improving their supply reserve margin practices to minimize these quantities to the greatest extent reasonable and be able to explain the level of their supply reserve margins in the future”.

CenterPoint stated the following regarding this topic.

CenterPoint Energy determines its planned gas supply based on the interplay of a multitude of factors and application of experience, expertise, and judgement. The factors that CenterPoint Energy considers in determining the extent to which it will acquire gas supplies in excess of its forecasted load include monthly pipeline imbalance levels, storage inventory levels, pipeline constraints and the availability of System

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<sup>34</sup> See Attachment DOC-3-C.

Management Service (“SMS”) balancing, potential weather supply cuts and weather forecast uncertainty. Each of these factors change constantly, so while CenterPoint Energy is intentional and deliberate in determining its planned gas supply relative to its load forecast, the dynamic nature of these different factors does not lend itself to setting an exact supply reserve target for each day of the year.<sup>35</sup>

While the Department appreciates the Company’s discussion, to the Department’s knowledge, the Commission’s reporting requirement did not include an exact supply reserve target for each day of the year. Rather, the Department believes that most regulators primary concern regarding supply reserve margin relates to the longer term contracts a natural gas utility holds as part of its demand entitlement and how the natural gas utility adjusts those agreements to meet changes in its forecasted design day demand.

In this regard, CenterPoint’s supply reserve margin over the past several years has been reasonable in applying a general rule of thumb of 5 percent, which can be considered a threshold.<sup>36</sup> Table 3 provides summary annual information on this metric from CPE’s annual demand entitlement filings for the past several years.

**Table 3 – CPE’s Annual Supply Reserve Margins 2016-2025<sup>37</sup>**

Docket No.	Heating Season	Reserve Margin
25-72	2025-2026	2.33%
24-146	2024-2025	3.18%
23-221	2023-2024	2.75%
22-306	2022-2023	2.96%
21-523	2021-2022	4.72%
20-565	2020-2021	0.66%
19-278	2019-2020	1.13%
18-462	2018-2019	0.04%
17-533	2017-2018	0.47%
16-571	2016-2017	0.84%

Given that the Company’s supply reserve margin has been below that 5 percent threshold each of the last 10 years, the Department considers that to be sufficient support to conclude that CPE has minimized that metric to a large degree.

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<sup>35</sup> 2025 ACF, p. 8 of 13 in PDF.

<sup>36</sup> *In the Matter of Greater Minnesota Gas, Inc.’s Petition for Change in Contract Demand Entitlement for the 2020-2021 Heating Season*, Public Utilities Commission, Order, March 12, 2021, Docket No. G022/M-20-391, (eDockets) [20213-171823-01](#), at 1.

<sup>37</sup> Request for a Change in Demand Units, Department, Response to Reply Comments, November 20, 2025, Docket No. G0008/M-25-72 (eDockets) [202511-225145-02](#). Department Exhibit No. 1.

Hence, the Department concludes the Company complied with this reporting requirement.

#### *C.1.4. Hedging Gas Prices via Financial Instruments*

Order Points 5 and 10 of the February 17<sup>th</sup> Order reference this topic. Order Point 5 requires the Company to “explore the availability and cost of contracting, hedging, and supply options for better protection against price spikes”. Order Point 10 is more concerned with any forward-looking gas planning or hedging filings.<sup>38</sup>

In its discussion of the Company’s efforts to comply with Order Point 5, CenterPoint stated in its August 1, 2025, annual compliance filing.

Post Storm Uri CenterPoint Energy continues to endure natural events, the Company continues to evaluate plans/modifications 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. . .

- Received approval from the Minnesota Public Utilities Commission (“MPUC”) to modify the structure of the hedging order to allow for more flexibility and to accommodate future customer growth in Docket No. G008/M-23-360.
- Adjusted Winter Season 24-25 hedging strategy to be based on maximum hedged volume of 25% of anticipated customer load requirements.<sup>39</sup>

Regarding CPE’s efforts to comply with Order Point 10, the Company stated:

CenterPoint Energy addresses its actual and forward-looking gas planning in the annual Gas Procurement Plan which was filed on July 28, 2025. The 2025 filing was filed under the hedging variance docket number G008/M-23-360. The document can be referenced for supply planning; including but not limited to, hedging plan, supply mix strategy, and expected load requirements.<sup>40</sup>

CenterPoint’s hedging effort is a complicated mechanism and has been in place for several years and the Company has been including it in the annual GPP filing for several years as well. Hence, the Department concludes the Company complied with the hedging-related aspects of these two reporting requirements.

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<sup>38</sup> *Ibid.*

<sup>39</sup> 2025 ACF, p. 6 of 13 in PDF.

<sup>40</sup> *In the Matter of a Petition of CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas for Approval of an Extension of Rule Variances to Minnesota Rules to Recover the Costs of Certain Natural Gas Financial Instruments through the Purchase Gas Adjustment Clause*, CenterPoint, Compliance, July 28, 2025, Docket No. G008/M-23-360 (eDockets) [20257-221463-02](#), (hereinafter 2025 Gas Purchase Plan or GPP).

## *C.2. Demand-Related Changes*

This category of tools for short-term price-spike mitigation rests on the concept that customers will either formally (through a tariffed-offering from the utility) or informally (through public appeals or other measures) restrict their usage of natural gas during periods when short-term price spikes occur.

### *C.2.1. Research Regarding Customer Responses to Conservation Calls*

Order Point 11 of the February 17<sup>th</sup> Order requires the Company to: “design plans that study customer responses to conservation calls.”<sup>41</sup>

CenterPoint described its efforts to research customer responses to conservation calls in its 2023 and 2024 ACF comments. For example, in its 2023 ACF the Company included a copy of a presentation that was made to dual-fuel customers. The presentation discussed the process for economic dispatch of interruptible customers CenterPoint would initiate if natural gas wholesale market prices exceeded the pricing parameters included in the Commission’s February 17<sup>th</sup> Order.<sup>42</sup> CPE also included a description of the methodology it would use to study customer response during those conservation calls. In its 2024 ACF, the Company detailed its proposed process for alerting customers of these higher natural gas prices. Given that there was a price spike in January 2024, the Company had the opportunity to initiate a customer conservation call, and it described that effort in its 2024 ACF as well. The Company also included an estimate of customers decreases in natural gas usage in response to that voluntary conservation effort. CenterPoint also curtailed a group of interruptible customers during the January 24 PE, although not solely for economic reasons.<sup>43</sup>

In its 2025 ACF, CenterPoint noted that natural gas prices didn’t meet the threshold for initiating customer conservation calls or curtailing interruptible customers, but it would continue to research the results of those efforts when they occur.<sup>44</sup>

The Department concludes the Company complied with the reporting requirements included in Order Point 11 of the February 17<sup>th</sup> Order in its 2025 ACF.

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<sup>41</sup> February 17th Order.

<sup>42</sup> 2023 ACF, p. 9-10 of 30 in PDF.

<sup>43</sup> 2024 ACF, p. 9-16 of 66 in PDF.

<sup>44</sup> 2025 ACF, p. 9-10 of 13 in PDF.

### C.2.2. *Economic Dispatch of Peak-Shaving Resources*

Order Point 14 of the February 17<sup>th</sup> Order requires CenterPoint and Xcel Energy to file dynamic proposals for calling on peaking resources that recognize these decisions depend on the economic and situation context of the utility and the market.<sup>45, 46</sup>

In 2022, CenterPoint, along with the other three natural gas LDCs (Joint Utilities)<sup>47</sup> that are included in this proceeding, filed a joint proposal requesting 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.<sup>48</sup>

The Commission rejected the Joint Utilities' proposal.<sup>49</sup>

Since the Commission's rejection of that proposal, CenterPoint has adopted a protocol that "evaluates its dispatch decisions on a case-by-case basis taking into account current conditions of the market and utility and circumstances of the forthcoming event". That protocol is discussed in CPE's discussion of both Order Point 12 and 14 in its 2025 ACF.<sup>50</sup>

The Department concludes the Company complied with the reporting requirements included in Order Points 12 and 14 of the February 17<sup>th</sup> Order in its 2025 ACF.

### C.2.3. *Curtailment Process Improvements for Economic and Reliability Purposes*

Order Point 6 of the Commission's June 2<sup>nd</sup> Order requires the Company to use the circumstances of the event, the prevailing winter, and the status of its fuel inventory to inform its peak-shaving dispatch decisions.<sup>51</sup>

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<sup>45</sup> February 17<sup>th</sup> Order.

<sup>46</sup> CPE included a discussion of Order Point 12 from the February 17<sup>th</sup> Order in its 2025 ACF at page 10. The Commission, in its June 2<sup>nd</sup> Order, discontinued the reporting requirements included in Order Point 12 at Order Point 8. Hence the Department didn't include a discussion of this Order Point in this document.

<sup>47</sup> The three other natural gas utilities are Great Plains Natural Gas, MERC and Xcel.

<sup>48</sup> *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers* and *In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery Process for Cost Impacts Due to February Extreme Market Conditions*, Joint Utilities, Comments, September 15, 2022, Docket Nos. G999/CI-21-135 and G008/M-21-138, (eDockets) [20229-189120-01](#), p. 2.

<sup>49</sup> February 17<sup>th</sup> Order, p. 23.

<sup>50</sup> 2025 ACF, p. 10 of 13 in PDF.

<sup>51</sup> June 2<sup>nd</sup> Order, Order Pt. 6.

The Company provided a discussion of its efforts to meet this goal, noting for example that CPE had added an automated calling/texting which will improve customer contact efficiency during conversation calls, whether formal or informal.<sup>52</sup>

Given that CenterPoint didn't initiate any conservation calls during the 2024-2025 winter season, there is no information that would allow the Department to evaluate the Company's performance. The Company's efforts in response to the January 2024 PE did identify CenterPoint's efforts. Hence, the Department concludes the Company complied with the reporting requirement.

#### *C.2.4. Interruptible Customer Compliance with Curtailment Orders*

Order Point 7 of the Commission's June 2<sup>nd</sup> Order requires the Company to report, in future August compliance filings, on how they are improving interruptible customer compliance with curtailment orders.<sup>53</sup>

CenterPoint provided a lengthy discussion of its efforts to meet this goal, outlining its process for ensuring compliance and reducing the occasional use of unauthorized gas.

Given that CenterPoint didn't initiate any conservation calls during the 2024-2025 winter season, there is no information that would allow the Department to evaluate the Company's performance. Hence, the Department concludes the Company complied with the reporting requirement.

#### *C.3. Reporting Obligations from February 17<sup>th</sup> Order and Order Approving 2023 ACF Not Required for Future ACFs*

##### *a. Reporting obligations from February 17<sup>th</sup> Order discontinued*

Order Point 8 of the Commission's June 2<sup>nd</sup> Order requires the Company to continue the reporting obligations outlined in ordering paragraphs 3, 5-11 and 14-15 of the Commission's February 17, 2023, Order in its future compliance filings.<sup>54</sup>

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<sup>52</sup> 2025 ACF, p. 1 of 13 in PDF

<sup>53</sup> *Ibid*, Order Pt. 7.

<sup>54</sup> *Ibid*, Order Pt. 8.

*b. Reporting obligation from Order Approving 2023  
ACF discontinued*

In its Order Approving 2023 ACF, the Commission included the following reporting requirement to “evaluate the storage service options provided by the interstate pipelines that serve them to determine which storage service option is most appropriate for their situation”.<sup>55</sup>

CenterPoint didn’t provide this analysis in its 2024 or 2025 ACFs.

In its June 2<sup>nd</sup> 2025 Order at Order Point 8, the Commission listed the reporting obligations that natural gas utilities involved in this proceeding were to continue to provide in future August compliance filings.<sup>56</sup> That list didn’t include the reporting obligation included in the Order Approving 2023 ACF at Order Point 2.

Hence, the Department concludes that CenterPoint was not required to provide the information regarding its selection of storage service options in its 2025 ACF and the Department has no further comments on this issue.

*D. REASONABLENESS OF CPE’S EFFORTS TO MITIGATE THE RISK OF SHORT-TERM NATURAL GAS PRICE SPIKES*

Two of the topics the Commission identified in its 2025 NOC include the term “reasonable”.<sup>57, 58</sup> An internet search using the term “reasonableness meaning in law” resulted in the following description:

In legal terms, reasonableness refers to behavior or decisions that align with what an average, prudent person would consider fair or appropriate in a similar situation. It serves as a standard for assessing the fairness and justifiability of actions or decisions, often used in determining liability and conduct in various legal contexts. Essentially, it means doing what a reasonable person would do under the circumstances, ensuring the parties act sensibly and not excessively demanding or harmful.<sup>59</sup>

Using this definition, the Department’s perspective is a reasonable response to the Commission’s various directives in its Orders should result in CenterPoint acquiring natural gas at prices during future short-term price spikes below the prices the Company paid for natural gas during the February 2021 PE.

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<sup>55</sup> Order Approving 2023 ACF, Order Pt 2.

<sup>56</sup> June 2<sup>nd</sup> Order, Order Point 8.

<sup>57</sup> 2025 Commission Notice, p. 2.

<sup>58</sup> The three topics refer to CPE’s conclusions regarding the results of its voluntary conservation report, its interruptible customer compliance and curtailment calls, and its strategies for achieving reasonable savings for ratepayers via its hedging, procurement and customer communications processes.

<sup>59</sup> See “[reasonableness meaning in law](#)” search results using Microsoft Copilot and Edge.

*D.1. Reasonableness of CPE’s Hedging, Procurement and Customer Communication Strategies for Achieving Reasonable Savings for Ratepayers, Interruptible Customer Compliance and Incorporation of Curtailment Calls, and Conclusions of Its Voluntary Conservation Report*

*D.1.1. Prices for Natural Gas Purchased during the 2024-2025 Winter Season*

As noted in the introduction, CenterPoint didn’t purchase any natural gas during the 2024-2025 winter season that met the Commission’s threshold criterion of exceeding five time the gas commodity cost included in the Company’s current monthly PGA.<sup>60, 61</sup>

Hence, no data was produced during the 2024-2025 heating season that would allow the Department to estimate the reasonableness of the Company’s efforts for this period.

However, CenterPoint did experience natural gas prices that met the Commission’s threshold criterion of exceeding five time the gas commodity cost included in the Company’s current monthly PGA during the 2023-2024 heating season.<sup>62, 63</sup>

*D.1.2. Price of Gas Delivered During the January 2024 Pricing Event*

The Company’s efforts to mitigate short-term price risk combined with more favorable weather conditions resulted in smaller overall gas cost related to the February 2024 PE compared to the January 2021 PE. Table 4 provides that comparison.

**Table 4 – Comparison of CenterPoint’s Extraordinary Gas Costs for the February 2021 and January 2024 Pricing Events<sup>64</sup>**

Line No.	Description	Extraordinary Gas Cost Incurred	% of Feb 21 Costs
1.	Jan 2024 PE	\$46,975,064	11.5%
2.	Feb 2021 PE	\$408,755,953	

While \$47 million is not a small figure, it is preferable and significantly smaller than the \$409 million.

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<sup>60</sup> June 2<sup>nd</sup> Order, at Order Pt 9.

<sup>61</sup> 2025 ACF, p. 6 of 13 of PDF.

<sup>62</sup> January 2024 Price Spike Filing, p. 1-2.

<sup>63</sup> Fortunately, the weather conditions and the corresponding effects on the supply of natural gas to Minnesota were not as severe during January 2024 Pricing Event as was experienced during the Winter Storm Uri PE.

<sup>64</sup> Department 2024 Comments , p. 13.

A comparative analysis of the Company’s average cost/dth for the two pricing events is included in Table 5. CenterPoint’s average cost/dth assuming the two events both consumed similar volumes allocated based on percentage of contract type, showed a marked decrease.

**Table 5 – Comparison of CenterPoint’s Average Gas Cost for the February 2021 and January 2024 Pricing Events Assuming January 2024 Volumes<sup>65</sup>**

Description	Average Cost/Dth	% of Feb 21 Costs
Jan 2024 PE	\$10.23	
Feb 2021 PE	\$17.83	42.6%

CPE’s results during the January 2024 PE compared to its results for the February 2021 PE and the Company’s statements that it has not changed its processes for the 2025-2026 heating season support a conclusion that CenterPoint’s efforts relative to its hedging, procurement and custom communication strategies are reasonable.

As part of its review of CPE’s 2024-2025 winter season results, the Department provided an avoided-cost analysis that estimated the cost CPE would have incurred if it had not modified its various supply and demand side processes since the February 2021 pricing event. The Department then subtracted the Company’s actual costs for the January 2024 PE to develop an estimate of the savings from the modifications CenterPoint had initiated since the February 2021 pricing event.<sup>66</sup> **Trade Secret** Table 6 summarizes that analysis.

**Table 6 – Department Estimate of CenterPoint’s Avoided Costs for the January 2024 PE (\$)**

Line No.	Description	Difference Vols	Total Cost - Actual	Total Cost -Using Feb 2021 Info	Avoided Costs
1.	Baseload - (FOM/Hedged)				
2.	Storage				
3.	Peaking/LNG				
4.	Peaking/Prop.				
5.	Daily Supply				
6.	Total Supply				

**[TRADE SECRET DATA HAS BEEN EXCISED]**

The Department’s analysis estimates CenterPoint’s avoided costs during the January 2024 PE to be approximately \$35 million. This analysis provides support for a conclusion that CenterPoint’s efforts relative to its hedging, procurement and customer communication strategies are reasonable.

<sup>65</sup> See **TRADE SECRET** Attachment DOC-4-C.

<sup>66</sup> *Ibid.*

*D.2. Reasonableness of CenterPoint's Interruptible Customer Compliance and Incorporation of Curtailment Calls*

The Department discussed CPE's efforts to comply with the Commission's requirements regarding the Company's Interruptible Customer Compliance and Incorporation of Curtailment Calls earlier in this document and concluded that a lack of data prevented the development of any analysis. By default, the Department concluded the Company had complied with the Commission's reporting requirements. The Department adopts a similar stance regarding this question. CenterPoint has made efforts in these areas; the Department cannot evaluate the reasonableness of those efforts if the program hasn't been utilized. Hence, the Department defaults to a conclusion that CPE's efforts are reasonable given current information.

*E. EXTRAORDINARY GAS 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 and 2024 ACFs. The Department thought it wise to include a similar update for CPE's 2025 ACF.

On September 30, 2025, CenterPoint filed its most recent quarterly report related to the recovery of costs associated with February 2021 gas market conditions. The combined under-recovery balance for this account was \$92,825,104.<sup>67</sup>

In its 2024 ACF comments, the Department asked if the Company is under-recovered as of the end of its Commission approved 63-month recovery period in November 2026, would CPE incorporate the under-recovered amount into the Company's next Annual Automatic Adjustment (AAA) filing in September of 2027 CenterPoint confirmed that it would.<sup>68</sup>

The Department assumes this Commission requirement is still in effect and has no recommendations regarding the Company's efforts to recover those extraordinary gas costs.

**IV. RECOMMENDATIONS**

Based on analysis of CenterPoint' 2025 ACF and the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section three subparts A, B, C, D and E.

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<sup>67</sup> September 2025 Surcharge Recovery Filing, Schedule A.

<sup>68</sup> Attachment DOC-5-C.

A. TOPICS OPEN FOR COMMENT

The Department:

- A.1. - concludes CenterPoint' 2025 ACF complies with the Commission's Orders in this proceeding.
- A.2. – this topic is not relevant to CenterPoint.
- A.3. – concludes the information regarding interruptible customer compliance and incorporation of curtailment calls in CenterPoint's 2025 ACF are reasonable.
- A.4 – concludes the information regarding hedging, procurement and customer communication in CenterPoint's 2025 ACF are reasonable.
- A.5 – recommends the Commission accept and approve CenterPoint's 2025 ACF.
- A.6 – did not identify any required additional changes to future compliance filing requirements but will defer making a recommendation until it can review other parties' comments.
- A.7 – didn't identify any other issues or concerns related to this matter.

B. SUMMARY OF CENTERPOINT' GAS PRACTICES COMMENTS

The Department has no recommendations for this section.

C. ANALYSIS

The Department:

- C.1. – recommends the Commission find CPE complied with the relevant reporting requirements reviewed in the following sections.
  - C.1.1. – *Gas Supply Planning*.<sup>69</sup>
  - C.1.2. – *Storage Inventory Management and Peak-Shaving Dispatch*.
  - C.1.3. – *Supply Reserve Margin*.
  - C.1.4. – *Hedging Gas Prices via Financial Instruments*.<sup>70</sup>
- C.2. - recommends the Commission find CPE complied with the relevant reporting requirements reviewed in the following sections.
  - C.2.1. – *Research Regarding Customer Responses to Conversation*.
  - C.2.2. – *Economic Dispatch of Peak-Shaving Resources*.
  - C.2.3. – *Curtailment Process Improvements for Economic and Reliability Purposes*
  - C.2.4. – *Interruptible Customer Compliance with Curtailment Orders*.
- C.3 - recommends the Commission find CPE complied with the relevant reporting requirements required in Order Point 8 of the Commission's June 2, 2025 Order.<sup>71</sup>

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<sup>69</sup> Section C.1.1 incorporates the following procurement practices listed previously: 1) An increase in FOM purchases; 2) An increase in Hedged Baseload purchases, and 3) Increased supplier diversity.

<sup>70</sup> Section C.1.4. incorporates the following procurement practices listed previously: 4) Optimizing its existing hedging program; 5) Increasing the diversity of its hedging program, and 3) Executing longer-term hedges.

<sup>71</sup> Order point 8 excludes reporting requirements or procedural actions from Order Points 1, 2, 4, 12, 13, 16, and 17 from the Commission's February 19<sup>th</sup> Order as well as Order Point 2 from its June 2<sup>nd</sup> Order.

Analyst assigned: John Kundert

*D. REASONABLENESS OF CPE'S EFFORTS TO MITIGATE THE RISK OF SHORT-TERM NATURAL GAS PRICE SPIKES*

- D.1. – recommends the Commission find CenterPoint Energy's hedging, procurement, and customer communication strategies, interruptible programs, general interruptible customer compliance efforts and specifically CPE's efforts to modify its interruptible customer curtailment process to be reasonable.

*E. STATUS OF CENTERPOINT EXTRAORDINARY GAS COST RECOVERY AND MISCELLANEOUS*

The Department has no recommendations regarding this section.

**Attachments**

<b>Title</b>	<b>Description</b>	<b>Topic</b>
<b>TRADE SECRET</b> DOC-1-C	Overview of CPE's 2025-2026 Gas Purchase Plan presentation dated October 9 <sup>th</sup> , 2025.	CPE's 2024-2025 results and 2025-2026 plan for gas purchasing.
DOC-2-C	Department IR 91.	CPE's response regarding recent changes to gas contracting processes.
DOC-3-C	Department IR 92.	CPE's response regarding recent changes to gas storage processes.
<b>TRADE SECRET</b> DOC-4-C	Department estimate of CPE's avoided costs during January PE	Reasonableness of CPE's actions to mitigate risk of short-term price spikes.
DOC-5-C	Department IR 89 from 2024 ACF.	Process for recovering the balance of the outstanding extraordinary gas costs through surcharge or PGA.

**Exhibits**

<b>Title</b>	<b>Description</b>	<b>Topic</b>
Exhibit DOC-1-C	Summary of Past and Current Reporting Requirements	Summary of February 17th Order, July 30th Order and June 2nd Order Reporting Requirements

**2025 Minnesota Gas Procurement Plan Overview**

**Prepared by CenterPoint Energy of Minnesota**

**October 9, 2025**

**Public Version**

To the Department's knowledge, there is no public version of this document.

**State of Minnesota**  
**Minnesota Department of Commerce**

**Utility Information Request**

Docket Number: G-008/M-21-138 - Cost Impacts/Extreme Weather  
Date of Request: 10/29/2025

Requested From: CenterPoint Energy Minnesota Gas  
Response Due: 11/14/2025

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 091	<p data-bbox="384 779 1347 860">Topic: Incorporating a Greater Degree of Baseload Purchases Reference(s): August 1, 2025, Annual Compliance Filing, page 7 of PDF</p> <p data-bbox="384 898 512 936"><b>Request:</b></p> <ol data-bbox="384 958 1374 1151" style="list-style-type: none"><li data-bbox="384 958 1374 1070">1. Has the Company made any significant changes to its processes for incorporating more baseload purchases into its winter season supply over the past 12 months?</li><li data-bbox="384 1072 1374 1151">2. If applicable, please provide the rationale for those changes and include estimates of the costs and benefits of that effort to ratepayers.</li></ol> <p data-bbox="384 1211 531 1249"><b>Response:</b></p> <ol data-bbox="384 1272 1382 1697" style="list-style-type: none"><li data-bbox="384 1272 1382 1697">1. One of the many action items taken by the Company since Winter Storm Uri was to evaluate and increase the portion of its planned supply requirements tied to a baseload transaction at first-of-the-month (FOM) prices. As you can see from the chart shown below (updated to show 2025-2026 plan from August 1 filing), the percentage of planned supply requirements to be met by baseload purchases has increased on average 5-10% since 2020-2021 winter season delivering greater price stability and reducing exposure to the gas daily markets. This proactive strategy reduces exposure to potential volatile spot markets, delivering more predictable costs and minimizing the risk of sudden price spikes during peak demand periods.</li></ol>

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

Winter Plan Year	Baseload - Index Price (Dth)	Total System Purchases (Dth)	% of Total System Purchases
2020-2021	21,050,000	104,336,576	20%
2021-2022	28,100,000	107,636,370	26%
2022-2023	26,669,930	103,458,231	26%
2023-2024	27,145,000	102,444,522	26%
2024-2025	29,969,950	102,390,966	29%
2025-2026	29,969,950	102,390,966	29%

2. For illustrative purchase, the comparison below shows the highest price reached in previous five winter seasons for NNG-Ventura spot market to NNG-Ventura FOM settlements:

Winter Plan Year	GDD Highest Settlement - Date	GDD Highest Settlement - Price	FOM - Price	Variance
2020-2021	2/17/2021	\$ 188.32	\$ 2.68	\$ 185.64
2021-2022	2/3/2022	\$ 7.04	\$ 6.02	\$ 1.02
2022-2023	12/22/2022	\$ 27.50	\$ 7.50	\$ 20.00
2023-2024	1/31/2024	\$ 35.38	\$ 3.07	\$ 32.31
2024-2025	2/19/2025	\$ 11.31	\$ 4.27	\$ 7.04

Recognizing these benefits, the Company will continue to prioritize baseload procurement strategies as part of its winter supply planning. This approach ensures sustained customer value through stable pricing and dependable service.

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: 10/29/2025

Requested From: CenterPoint Energy Minnesota Gas  
Response Due: 11/14/2025

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 092	<p data-bbox="384 786 1347 860">Topic: Modifications to Storage Inventory Management Reference(s): August 1, 2025, Annual Compliance Filing, page 7 of PDF</p> <p data-bbox="384 902 512 936"><b>Request:</b></p> <ol data-bbox="384 965 1374 1149" style="list-style-type: none"><li data-bbox="384 965 1374 1070">1. Has the Company made any significant modifications to its storage inventory management processes relative its winter season supply over the past 12 months?</li><li data-bbox="384 1077 1374 1149">2. If applicable, please provide the rationale for those changes and include estimates of the costs and benefits of that effort to ratepayers.</li></ol> <p data-bbox="384 1216 531 1249"><b>Response:</b></p> <ol data-bbox="384 1279 1390 1619" style="list-style-type: none"><li data-bbox="384 1279 1390 1619">1. CenterPoint Energy's storage management process is guided by initiatives that prioritize customer benefit and operational resilience. These initiatives focus on optimizing storage utilization to deliver price stability, ensure reliable supply during peak demand, and enhance system flexibility. By strategically managing injection and withdrawal schedules, diversifying storage assets, and leveraging advanced analytics, the Company aims to minimize market volatility impacts and provide predictable, affordable service to customers while maintaining robust operational performance.</li></ol> <p data-bbox="384 1664 1390 1845">Since Winter Storm Uri, the Company has maintained robust storage capacity to safeguard reliability and price stability during extreme weather events. Building on this foundation, the Company has expanded its storage portfolio over the past 12 months, by increasing the amount of firm storage capacity tied to East Cheyenne/Tenaska storage by 3.2</p>

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

Bcf and adding ANR Pipeline Company storage of 4.5 Bcf. CenterPoint Energy's total storage portfolio has increased by 10.3 Bcf or 33% (increase of 148K Dth/day withdrawal deliverability) since 2020-2021 winter season.

2. CenterPoint Energy's decision to maintain storage levels since Winter Storm Uri and expand its storage portfolio over the past 12 months reflects a commitment to enhancing reliability and shielding customers from market volatility. Increased storage capacity enables the Company to secure supply during peak demand periods and reduce reliance on potential high-priced spot purchases during extreme weather events. This strategy delivers significant benefits to ratepayers, including improved price stability and predictable billing. Although the value of storage has risen, the benefits of adding capacity strengthening supply security, mitigating exposure to market volatility, and ensuring customers receive dependable and affordable service even under challenging conditions. Costs can be found in the Company's demand entitlement filings. The most recent filing is Docket No. G-008/M-25-72. On a monthly basis the Company provides demand costs in its PGA filing.

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

[TRADE SECRET DATA HAS BEEN EXCISED]

**Comparison of Jan 2024 and Feb 2021 Pricing Events with Jan 2024 Volumes and Prices and 2021 Prices**

**January 2024 Volumes and Prices - Actuals**

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

**January 2024 Volumes and February 2021 Prices - Actuals**

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

**Difference between February 2021 and January 2024 Costs**

Line No.	Description	Difference Vols	Total Cost -2024 Actual	Total Cost -Using 2021 Info	Difference
1.	Baseload - (FOM/Hedged)				
2.	Storage				
3.	Peaking/LNG				
4.	Peaking/Prop.				
5.	Daily Supply				
6.	Total Supply				

**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"><li>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"><li>a. Given the current Commission-approved recovery mechanism, will the Company recover the entirety of the 2021 February 13<sup>th</sup> through 17th Total Extraordinary Expense by November 2026?</li><li>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?</li><li>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.</li></ol></li></ol> <p><b>Response:</b></p> <ol style="list-style-type: none"><li>1.<ol style="list-style-type: none"><li>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</li></ol></li></ol>

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

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.”

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

Order	Date	Order Point	Topic/Action	Action	Current Status	CenterPoint Complied?	DOC Comments Citation
February 17th Order	2/17/2023						
		1	Trigger for Economic Curtailment	Denied	Removed in 2025 ACF Order	Not Applicable (NA)	page 15, footnote 54
		2	Update Existing Interruptible Tariffs	Approved	Removed in 2025 ACF Order	NA	page 15, footnote 54
		3	14 day compliance filing for high gas prices	Approved	Modified in 2025 ACF Order	NA	pages 1 and 16
		4	NAESB - changing force majeure language	Approved	Removed in 2025 ACF Order	NA	page 15, footnote 54
		5	Price spike mitigation using contracting, hedging, and supply options	Approved	Active	Yes	page 6 - 12
		6	Additional Baseload Purchases	Approved	Active	Yes	pages 7-8
		7	Storage Inventory Modifications	Approved	Active	Y	pages 9-10
		8	Supply Reserve Margin	Approved	Active	Yes	pages 10-11
		9	Supply Diversity	Approved	In Demand Entitlement (DE) filing	See Docket G008/M-25-72	NA
		10	Forecasted Supply Mixes	Approved	Active - but in DE or Planning	See Docket G008/M-25-72	NA
		11	Research on Customer Responses to Conservation Calls	Approved	Active	Yes	page 13-15
		12	CPE-only peak-shaving requirement	Approved	Removed in 2025 ACF Order	NA	NA
		13	Xcel-only peak-shaving requirement.	Approved	Removed in 2025 ACF Order	NA	NA
		14	CPE and Xcel-only requirement economic dispatch/peak-shaving resources	Approved	Active	NA	NA
		15	Annual compliance filing requirement	Approved	Procedural	Yes	procedural
		16	Gas IRP process approved for MERC, CPE and Xcel	Approved	Discontinued in 2025 ACF Order	NA	page 15, footnote 54
		17	Gas IRP budget requirement	Approved	Discontinued in 2025 ACF Order	NA	NA
		18	Procedural	Approved	Active	Yes	procedural
2023 Compliance	7/30/2024						
		1	Accepting and approving 2023 compliance filings	Approved	Discontinued in 2025 ACF Order	Yes	NA
		2	Storage Service Option Evaluations	Approved	Discontinued in 2025 ACF Order	Yes	pages 15-16
2024 Compliance	6/2/2025						
		1	CenterPoint 2024 ACF	Approved	Active	NA	procedural
		2	Great Plains 2024 ACF	Approved	Not relevant to CenterPoint	Yes	NA
		3	MERC 2024 ACF	Approved	Not relevant to CenterPoint	NA	NA
		4	Xcel 2024 ACF	Approved	Not relevant to CenterPoint	NA	NA
		5	Great Plains report on voluntary conservation	Approved	Not relevant to CenterPoint	NA	NA
		6	Curtailment process improvements for economic and reliability purposes	Approved	Active	Yes	page 14
		7	Interruptible customer compliance with curtailment orders	Approved	Active	Yes	page 15
		8	Procedural	Approved	Identification of Active Reporting Requirements	Yes	page 15
		9	Procedural	Approved	Modification of Reporting Times for Price Spike Event	Yes	page 16
		10	Procedural	Approved	ACF - Still required	Yes	2025 ACF

## **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 **8<sup>th</sup>** day of **December 2025**

**/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	Christina	Benning	christina.benning@centerpointenergy.com	CenterPoint Energy Minnesota Gas			Electronic Service		No	21-135Official Service List
5	Alicia	Berger	alicia.e.berger@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	21-135Official Service List
6	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 St. Paul MN, 55101 United States	Electronic Service		No	21-135Official Service List
7	Mike	Boughner	michael.l.boughner@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	21-135Official Service List
8	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	21-135Official Service List
9	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	21-135Official Service List
10	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
11	Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
12	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
13	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

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO, 63119-2044 United States	Electronic Service		No	21-135Official Service List
15	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
16	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
17	Brian	Edstrom	briane@cupminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	21-135Official Service List
18	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	21-135Official Service List
19	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	21-135Official Service List
20	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	21-135Official Service List
21	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	21-135Official Service List
22	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	21-135Official Service List
23	Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY		401 Nicollet Mall FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	21-135Official Service List
24	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	21-135Official Service List
25	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	21-135Official Service List
26	Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 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	Joylyn C	Hoffman Malueg	joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources		2685 145th St W Rosemount MN, 55068 United States	Electronic Service		No	21-135Official Service List
28	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	21-135Official Service List
29	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	21-135Official Service List
30	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	21-135Official Service List
31	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
32	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
33	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
34	Nicole	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
35	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
36	Annie	Levenson Falk	annief@cbminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	21-135Official Service List
37	Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	21-135Official Service List
38	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
39	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

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
40	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	21-135Official Service List
41	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	21-135Official Service List
42	Sarah	Mead	sarah.mead@wecenergygroup.com	MERC		null null, null United States	Electronic Service		No	21-135Official Service List
43	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	21-135Official Service List
44	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
45	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	21-135Official Service List
46	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
47	Stacey	Murphree	stacey.murphree@centerpointenergy.com	CenterPoint Energy Minnesota Gas			Electronic Service		No	21-135Official Service List
48	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
49	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
50	Carol A.	Overland	overland@legalectric.org	Legaelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	21-135Official Service List
51	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
52	Lisa	Peterson	lisa.r.peterson@xcelenergy.com			414 Nicollet Mall FL 7 Minneapolis MN, 55401 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
53	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
54	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
55	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
56	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
57	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	21-135Official Service List
58	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
59	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
60	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
61	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
62	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
63	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
64	Kent	Sulem	ksulem@mmua.org			3131 Fernbrook Ln N Ste 200 Plymouth MN, 55447-5337 United States	Electronic Service		No	21-135Official Service List
65	Casey	Whelan	cwhelan@kinectenergy.com	Kinect Energy Group		605 Highway 169 N Ste 1200 Plymouth	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, 55441 United States				
66	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
67	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
68	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	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
2	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
3	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
4	Christina	Benning	christina.benning@centerpointenergy.com	CenterPoint Energy Minnesota Gas			Electronic Service		No	21-138Official Service List
5	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 St. Paul MN, 55101 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	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	21-138Official Service List
8	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	21-138Official Service List
9	Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-138Official Service List
10	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
11	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
12	Seth	DeMerritt	seth.demerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402	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				
13	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 United States	Electronic Service		No	21-138Official Service List
14	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
15	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
16	Edward	Garvey	garveyed@aol.com		Residence	32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	21-138Official Service List
17	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
18	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
19	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
20	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
21	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
22	Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402	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				
23	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
24	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	21-138Official Service List
25	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
26	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		Yes	21-138Official Service List
27	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
28	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	21-138Official Service List
29	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
30	Stacey	Murphree	stacey.murphree@centerpointenergy.com	CenterPoint Energy Minnesota Gas			Electronic Service		No	21-138Official Service List
31	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
32	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

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
33	Lisa	Peterson	lisa.r.peterson@xcelenergy.com			414 Nicollet Mall FL 7 Minneapolis MN, 55401 United States	Electronic Service		No	21-138Official Service List
34	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
35	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	21-138Official Service List
36	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
37	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
38	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-138Official Service List
39	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
40	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
41	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
42	Michael A.	Yuffee	michael.yuffee@bakerbotts.com	Baker Botts		700 K St NW Washington DC, 20001 United States	Electronic Service		No	21-138Official Service List