



505 Nicollet Mall
P.O. Box 59038
Minneapolis, MN 55459-0038

December 6, 2024

Mr. Will Seuffert
Acting Executive Secretary, General Counsel
Minnesota Public Utilities Commission
121 East 7th Place, Suite 350
St. Paul, MN 55101-2147

VIA E-FILING

**RE: In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery Process for Cost Impacts Due to February Extreme Market Conditions
Annual Compliance Filing
Docket No. G-008/M-21-138 and Docket No. G-999/M-21-135 – REPLY COMMENTS**

Dear Mr. Seuffert:

On August 1, 2024, CenterPoint Energy (the "Company") submitted a compliance to Order Point 15 of the Commission's February 17, 2023, in Docket No. G-008/M-21-138 Order (hereafter "Order").

On November 27, 2024, the Department of Commerce, Division of Energy Resources (the "Department") filed Comments regarding the Company's compliance filing. The Department recommends that the Minnesota Public Utilities Commission accept CenterPoint Energy's compliance filing, but, had an outstanding question regarding demand response efforts that they would like addressed by the Company. The Company appreciates the Department's review, and supports the Department's recommendations, and is always willing to answer any questions that the Department may have in their research of reports submitted by the Company. The Company's response to the Department's question about demand response efforts is included below:

The Department requests CenterPoint include a discussion of its efforts to update its demand response efforts since 2021 in its reply comments.

Studying customer response to conservation calls can be very difficult as there are many variables that could alter our expected usage. As the Company acquires more tools to analyze conservation efforts, the Company will provide more accurate and meaningful data for customer response.

The Company reviews customer communications response as discussed in Section 11 of the August 1, 2024, filing. This information allows the Company to review how many customers received the communications and gives the Company an idea how proactive customers were in receiving the information. For example, on January 11, 2024, a conservation request email was issued, and 51.29% of our customers opened the email. However, only 0.26% clicked on the link within the email to get more information. It is not easy to estimate how many of the 51.29% that opened the email began to conserve usage, but one would assume the people that took more time to investigate the email ("click") would be more likely to take advice from the email and

conserve energy. The Company will continue to review customers responses to conservation communications. Further information in the August 1, 2024, report discusses social media posts and their effectiveness in reaching our customers.

The Company also provided an analysis in Section 11 of customer usage. The Company will continue to do a similar analysis and starting in the August 1, 2025, report the company will include:

A study regarding customer response to conservation calls should they occur during the 2024-2025 heating season. Within this study, the Company will review models of our expected gas usage without conservation calls and compare that to what the actual usage was during the conservation call. As there are many variables that could alter our expected usage, the Company will use the usage from the most consistent weather day of the same winter season. By comparing a similar weather day, the Company will have the ability to analyze the impacts the conservation call may have had on customers based on usage. As meter technologies continue to get smarter, we expect that our studies of conservation calls will be more impactful in the future.

Annually the Company survey's its large volume interruptible customers to receive feedback on why they use unauthorized gas. The feedback was included in the August 1, 2024, filing. This practice will continue, and the Company will report back information that it receives from large volume interruptible customers as to why they may or may not curtail when an economic curtailment is called.

The Company appreciates the analysis and Comments provided by the Department and is willing to provide any information that the Department may need to complete its review.

If you have any questions or require additional information, please contact me at 612.321.4677 or Donald.Wynia@CenterPointEnergy.com.

Sincerely,

/s/

Donald W. Wynia
Regulatory Analyst

cc: Service List

CERTIFICATE OF SERVICE

Donald Wynia served the above Reply Comments in response to the November 27, 2024, *Comments* filed by the Minnesota Department of Commerce (Docket No. G-008/M-21-138) to all persons at the addresses indicated on the attached list by having the document delivered by electronic filing.

 /s/
Donald W. Wynia
Regulatory Analyst, Regulatory Services
CenterPoint Energy

Date: December 6, 2024