

May 9, 2018

Daniel P. Wolf, Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101

RE: **Response Comments of the Minn. Department of Commerce, Division of Energy Resources**
Dockets G002/M-18-241, G004/M-18-248, G008/M-18-235, G011/M-18-243, G022/M-18-249

Dear Mr. Wolf:

Below are the response comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) regarding the gas affordability program (GAP) annual reports filed in the above-referenced dockets. The five rate-regulated gas utilities in Minnesota filed reports at the end of March/beginning of April of this year, and the Department filed comments on April 18 recommending that the Minnesota Public Utilities Commission (Commission) accept the annual reports. These response comments concern minor issues addressed by CenterPoint Energy (CenterPoint) in that company's reply comments filed April 27, 2018.

The Department appreciates the clarifications in CenterPoint's reply comments, which corrected three numbers in the Department's initial comments. Regarding the payment frequency cited on Table 2 of the Department's comments, the Department appreciates CenterPoint correcting a typo. Regarding the payment frequency cited on Table 4 of the Department's comments, the Department acknowledges that CenterPoint provided this information on Table 2 of the Company's initial filing, but in a different format and methodology than as provided by the Minnesota Energy Resources Corporation; the difference contributed to the Department's omission. Lastly, regarding the retention rate cited on Table 10 of the Department's comments, the Department had calculated the value as 1 minus the "percent of final participation" in Table 11 of CenterPoint's initial filing; whereas CenterPoint clarified that the correct number was from Table 10 of CenterPoint's initial filing.

The Department notes that the second and third errors arose in large part from the different ways that utilities comply with reporting requirements, which makes it more difficult to compare metrics across utilities and can lead to confusion. This issue highlights the benefit of a more streamlined reporting process that is consistent across utilities. Improving reporting consistency will be addressed in the forthcoming report of the GAP stakeholder group, to be filed soon in compliance with the Commission's May 22, 2017 Order in Docket Nos. G008/M-16-486, G002/M-16-493, and G004/M-16-495.

Sincerely,

/s/ STEPHEN COLLINS
Rates Analyst

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Response Comments**

Docket No. G002/M-18-241, G004/M-18-248, G008/M-18-235, G011/M-18-243, and G022/M-18-249

Dated this 9th day of May 2018

/s/Sharon Ferguson

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