



September 9, 2024

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

Re: In the Matter of a Commission Investigation into Gas Utility Resource Planning Docket No. G008,G002,G011/CI-23-117

CENTERPOINT ENERGY RESPONSE TO SUGGESTED DECISION OPTIONS

Dear Mr. Seuffert:

CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or "Company") and the other parties to the above referenced proceeding continue to discuss potential decision options based on the August 29, 2024, Staff Briefing Papers in the Matter of Commission Investigation into Gas Utility Resource Planning ("Briefing Papers") in an effort to find common ground and narrow the issues before the Commission. However, while those discussions may continue and the parties may find additional common ground, the parties continue to have a diversity of opinion as of the filing of this letter. Therefore, the Company respectfully submits this letter based on our current understanding of the parties' various positions and will be prepared to provide any necessary update at the Commission hearing on September 12, 2024. The Company appreciates the continued collaboration with parties.

Given the multitude of decision options presented in Briefing Papers and being discussed by the parties, the Company first specifically identifies those decision options supported or offered by Department of Commerce ("Department"), Office of the Minnesota Attorney General Residential Utilities Division ("OAG"), Center for Energy and Environment ("CEE"), Citizens Utility Board ("CUB"), Clean Energy Organizations ("CEOs"), and Building Decarbonization Coalition (together "Joint Commenters"), which the Company opposes or that cause the greatest concern. The Company then lists those decision options in Staff Briefing Papers that CenterPoint Energy supports.

In developing its position, the Company has been guided by two overarching principles. First, the Company does not support substantially reconsidering or modifying the Commission's findings in its March 27, 2024, Order Establishing Framework for Natural Gas Utility Integrated Resource Planning ("Framework Order"). The Framework Order was the result of considerable party and Commission effort and sets a solid base from which the utilities and parties can work to develop Minnesota's first gas resource plans. Further, no party filed any objection to the Framework Order. Given that the Framework Order has not yet been put to use through the filing of an actual gas resource plan, to the extent the Commission determines any clarification to any of the Framework Order ordering points would be helpful, the Company suggests those clarifications be accomplished through additional order points wherever possible, not through revisions to the Framework Order. Second, the Company urges the Commission to continue to adopt a big picture view of the purpose of resource planning and avoid the urge to be overly

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prescriptive at this time. The Commission and all parties understand that resource planning is an iterative process that will be refined over time. Attempting to address specific detail now for certain items, while leaving other items broadly defined, may frustrate the development of meaningful plans.

Finally, CenterPoint Energy continues to recommend a project threshold of \$10 million for the energy alternatives analysis ("EAA"), at least as to CenterPoint Energy, to provide a reasonable focus to the number of projects reviewed. While the Company believes there should be various types of learnings in the EAA process, casting too broad a net in the first such analyses may only consume unnecessary resources and provide unclear direction going forward. As shown in the table below, based on historic data that was provided in the briefing papers, this project threshold will allow CenterPoint Energy to meet the two to three project requirements for the alternatives analysis, and continue to provide meaningful information.

Table 1. Capacity Expansion Project Counts at Varying Thresholds, 2018-2023

Threshold	\$1 Million	\$3 Million	\$5 Million	\$10 Million	\$15 Million
CPE	15 projects	5 projects	4 projects	4 projects	4 projects
MERC	6	2	2	2	1
Xcel	6	4	Not included	Not included	Not included

CenterPoint Energy is uncertain of the screening process proposed by some stakeholders. After initial discussion to understand information that will inform stakeholder review of the projects eligible for analysis, the Company believes it is likely that substantial supporting analysis would be required on all projects above the threshold for stakeholders to review the Company's suggested two to three projects. Since there is still uncertainty between the "screening" analysis and the "full" analysis, the Company is preliminarily envisioning the two analyses could be quite similar. Until the Minnesota stakeholders and utilities gain additional knowledge in this process, CenterPoint Energy requests the Commission consider the additional resources and cost this process will require from not only utilities, but all stakeholders, when selecting the cost threshold for each utility. Like the differences in the IRP process for each of the unique electric utilities, CenterPoint Energy believes it is important to recognize the differences in each of the gas utilities as well.

CenterPoint Energy would like to thank the Commission for the opportunity to provide this summary of its position on the various Decision Options, as summarized in Staff Briefing Papers or presented by the parties.

Sincerely,

/s/ Seth DeMerritt

/s/ Emily Suppes

Manager, Regulatory and Rates

Director, Regulatory Affairs

Attachment

C: Service Lists

Docket No. G008,G002,G011/CI-23-117 CenterPoint Energy Minnesota Gas Response to Decision Options September 9, 2024

The Company understands that Department of Commerce ("Department"), Office of the Minnesota Attorney General Residential Utilities Division ("OAG"), Center for Energy and Environment ("CEE"), Citizens Utility Board ("CUB"), Clean Energy Organizations ("CEOs"), and Building Decarbonization Coalition (together "Joint Commenters") will be filing a set of proposed decision options concurrent with this filing. CenterPoint Energy does not object to those proposed decision options, with the exception of the following:

Joint Commenters proposed decision option 20: Replace ordering paragraph 51 of the Commission's March 27, 2024, Order in these dockets with the following:

Gas integrated resource plans shall include infrastructure projects related to resource expansion or new resources at or above a [\$1 million] threshold from which utilities select projects for an Expansion Alternatives Analysis. Utility resource plans shall include a discussion of the rationale for the projects selected for an Expansion Alternatives Analysis, and summary of the utility's discussions with stakeholders throughout the selection process.

H. \$1 million, with a cap on 10 projects

CenterPoint Energy does not support the proposed modification to ordering paragraph 51 proposed in decision option 20 and does not support a \$1 million dollar threshold. The three utilities have many differences, and the Company continues to support a higher threshold for CenterPoint Energy of \$10 million dollars, represented in Decision Option 21 and D. If the Commission prefers to set a maximum for projects considered for EAA, the Company would support decision option E. For clarification, the Company does not support F.

- 21. Replace ordering paragraph 51 of the Commission's March 27, 2024 Order in these dockets with the following: Integrated resource plans shall include an analysis of infrastructure projects related to individual projects, or a set of inter-related facilities needed to meet a specified capacity expansion need due to growth by existing or new customers and facilities at or above a threshold of [\$]
 - D. \$10 million

[OR]

E. \$10 million, but no more than five total projects must be considered for the EAA

Joint Commenters proposed decision option 28 **Modified**: Replace ordering paragraph 52 from the Commission's March 27, 2024, Order in these dockets with the following: Require that <u>an Expansion Alternatives Analysis</u> a full alternatives evaluation, as required by Order Point 54 of the Commission's March 27, 2024, Order, includes at a minimum, evaluation of:

- A. non-pipeline alternatives and/or non-natural-gas alternatives;
- B. costs and benefits of those alternatives including the costs of direct investment, variable costs, and the social costs of carbon and methane for emissions due to or avoided by the alternative;

- C. air quality impacts;
- D. a thorough and transparent explanation of the criteria used to rank or eliminate such alternatives; and an explanation of how equity was considered.

CenterPoint Energy opposes decision option 28 Part A proposed by the Joint Commenters. Specifying a particular subset of alternatives in decision option 28.A. does not utilize existing alternatives identified in Minnesota legislation like the Natural Gas Innovation Act ("NGIA"). Therefore, if the Commission believes additional discussion is necessary on this point, CenterPoint Energy suggests that subpart A be revised to state:

A. alternatives as defined in Minn. Stat. § 216B.2427, subd. 1;

Joint Commenters proposed decision option 88: Deny MERC's request for deferred accounting.

CenterPoint Energy supports utilities being able to utilize deferred accounting for costs that are not being recovered in base rates due to the expansion of the IRP scope. Due to the potential scheduling of the utilities first IRP filings, it is plausible that the work to perform the IRP filing may occur outside of a utility rate case test year. Moreover, as the resource planning process for gas utilities moves forward, the scope of the effort required is being further defined. As addressed in CenterPoint Energy's ongoing rate case in Docket No. G008/GR-23-173, CenterPoint Energy anticipates that its IRP filing will cost approximately \$800 thousand between internal labor and consultant costs. If those costs were to be denied in the rate case, CenterPoint Energy would need to seek those cost recoveries via deferred accounting.

CenterPoint offers the proposed modification below to address this:

87. CPE modification: Allow utilities deferred accounting treatment of costs associated with developing and implementing a Gas IRP for costs that are above and beyond what are being recovered in base rates. process for reporting, conducting a Gas IRP, the costs associated with the regulatory process for the Gas IRP filings, and implementing a Gas IRP once approved by the Commission.

Joint Commenters proposed decision option 95. Require Xcel, CenterPoint Energy, and MERC to work with electric utilities in their service territories to understand, to the extent possible, the electric system impacts on resource options in the natural gas IRPs.

CenterPoint Energy understands the intent of the proposed decision option is to encourage coordination with electric utilities for potential projects through EAA that may impact their system. The Company has reservations with this request if applied generally to the entire footprint of the resource plan, as CenterPoint Energy has sixty-five electric providers in our territory. CenterPoint Energy could support this decision option with the proposed clarification below that this coordination would be limited to EAA projects.

95. CPE modified. Require Xcel, CenterPoint Energy, and MERC to work with electric utilities in their service territories to understand, to the extent possible, the electric system impacts on <u>EAA</u> resource options in the natural gas IRPs.

Joint Commenters proposed decision option CUB/CEE NEW A: Amend Ordering Paragraph 3 of the March 27, 2024 Order in this docket as follows: "Integrated resource planning for natural gas utilities includes analysis and evaluation of the appropriate resource mix, including supply-side and demand-side resources to serve customer end-use energy needs., and The resource selection process shall include consideration of new all planned capital and non-

capital infrastructure investments costs associated with each resource. above a defined threshold necessary to meet existing or forecasted gas demand needs. Infrastructure investments for routine maintenance, safety, public works accommodation, integrity, and reliability are not part of the integrated resource planning process or analysis, and existing proceedings covering procurement and cost recovery of natural gas supply, transportation, and storage should continue independently from this proceeding."

Joint Commenters proposed decision option CUB/CEE NEW B: Amend Ordering Paragraph 55 of the March 27, 2024 Order in this docket as follows: "Distribution system investments related to routine maintenance, public works accommodation, integrity, reliability, and safety are not part of the integrated resource planning process or expansion alternatives analysis."

CUB/CEE New A and B would change the original understanding of Ordering Paragraph 3 and 55 by putting back required public works projects and costs incurred pursuant to state and federal pipeline safety programs into gas resource planning costs. While the proposed decision options would still exclude these costs from any required EAA, these costs are not avoidable and will not vary, regardless of the utility's preferred resource plan or any approved modification to that plan. Moreover, such costs are extremely challenging to project five to 10 years in the future. Both required public works projects and federal and state safety regulations change as circumstances change, and utilities have no control over such changes. If the Commission determines that additional clarification of these order points is necessary, for example, to ensure that resource plans capture all relevant costs or to ensure that any "cost threshold" set for EAA does not eliminate projects from inclusion in an overall resource plan, the Company offers the proposed new decision options below:

- 3. A. (New): The analysis and evaluation conducted in this resource planning will include all planned costs associated with each resource.
- 21. I. (New): The cost thresholds established apply only to the required Energy Alternatives Analyses.

With respect to the other decision options set forth in Staff Briefing Papers, CenterPoint Energy supports the following:

74. Clarify that, for purposes of ordering paragraph 40 of the Framework Order in these dockets, the high load forecast may represent the Commission-approved forecast for design day as provided in the utilities' most recent demand entitlement filing, and the Commission- approved sales forecast as provided in the utilities' most recent rate case.

CenterPoint Energy continues to support this proposal as it creates alignment and consistency across dockets that parties are simultaneously reviewing and making decisions on. The planning of capacity and supply resources CenterPoint Energy historically used has proven to meet the resource needs of its customers, and the Company's goal is the safety and reliability of our customers, without acquiring excess amounts of capacity or building unnecessary pieces to the Company's system.

With respect to all other decision options, the Company either takes no position or opposes, as discussed in prior comments, and will be prepared to discuss those matters at the Commission hearing on September 12, 2024.

1. Require gas utilities to include in their integrated resource plan a discussion of how equity was considered in the planning process.

- 13. Require Xcel to file its first gas IRP by October 1, 2026, and require the other two utilities to file their Plans on a 12-month cadence, beginning with CenterPoint on October 1, 2027, and MERC on October 1, 2028.
- 15. Clarify that, as used in ordering paragraph 51 of the Commission's March 27, 2024, order in these dockets, "infrastructure costs" are the capital costs the utility would pay to do the project.
- 16. Clarify that, as used in ordering paragraphs 51 and 54 of the Commission's March 27, 2024 order in these dockets, "Capacity Expansion Project, Resource Expansion, or New Resources" are individual projects, or a set of inter-related facilities needed to meet a specified capacity expansion need due to growth by existing or new customers and facilities.
- 19. Replace the section title immediately preceding ordering paragraph 51 of the Commission's March 27, 2024, Order in these dockets with the following: Expansion Alternatives Analysis.
- 41. Joint Commenters modified: Require utilities to select prioritize capacity expansion projects for Expansion Alternatives Analysis with the potential for learning using equity criteria and those located in low-income and/or Environmental Justice Areas as defined in Minn. Stat. § 116.065, subd. 1(e) (2023).
- 46. Joint Commenters Modified Require utilities in their gas IRPs to consider the State's economy wide greenhouse gas reduction statutory goals consistent with Minn. Stat. § 216H.01 and 216H.02 using 2020 as the baseline year. Lifecycle GHG emission factors from filed Natural Gas Innovation Act (NGIA) Plans can also be considered in resource analysis to ensure lower emissions on a lifecycle basis.
- 54. Require utilities to include in their gas IRPs additional information about upstream emissions data availability.
- 61. To estimate environmental externality costs of resource options in gas IRPs, utilities shall use the most recent externality values adopted by the Commission in Docket No. E-999/CI-14-643.
- 68. Delegate authority to the Executive Secretary to open a comment period in Docket Number E999/CI-07-1199 to consider and determine the appropriate data source and values for the regulatory cost of greenhouse gas emissions for natural gas resource planning through the upcoming docket to update the regulatory cost of carbon for electric resource planning.
- 91. For each project proposed in its preferred five-year action plan, require the utility to include justification of need, resource mix, project scope, construction timeline, cost estimates including any offsetting revenues and tax benefits, and a narrative discussion of any equity impacts the project may have.
- 94. Modify ordering paragraph 36 of the March 27, 2024 Order in these dockets as follows: A utility shall include in its resource plan filing a nontechnical summary, not exceeding 25 pages in length, describing the utility's resource needs, the resource plan created by the utility to meet those needs, the process and analytical techniques used to create the plan, activities required over the next five years to implement the plan, and the likely effect of plan implementation on electric rates and bills.

101. Authorize the Executive Secretary to create a "Comprehensive Gas IRP Requirements" document which reconciles the gas IRP requirements established in the Framework Order filed March 27, 2024, and the additions and modifications to those requirements made above, and issue the document as an attachment to the Order. Delegate continuing authority to the Executive Secretary to update the Comprehensive Gas IRP Requirements document to reflect any future modifications or additions to the gas IRP requirements established in future Commission decisions, to be filed as an attachment to future orders establishing such changes.

Joint Commenters proposed decision option **Local 49 (NEW):** In developing their Integrated Resource Plan, the utilities will engage with stakeholder groups to provide information about the utilities' planning process and expansion alternative analysis project selection, answer stakeholder questions, and seek stakeholder feedback to inform the resource plan. The stakeholder groups shall include, at minimum, relevant state agencies, clean energy advocates, consumer advocates, low-income and environmental justice advocates, organized labor, local governments, and business, and communities directly impacted or served by EAA projects. In each resource plan, natural gas utilities will provide a narrative description of its outreach and engagement activities and a summary of stakeholder feedback.

CERTIFICATE OF SERVICE

On Monday, September 9, 2024, Melodee Carlson Chang certifies that she served the attached response of CenterPoint Energy in Docket No. G008,G002,G011/CI-23-117 to all persons at the addresses indicated on the attached service list by having the document delivered via electronic filing, or if indicated, via U.S. Mail.

/s/ Melodee Carlson Chang

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William D	Kenworthy	will@votesolar.org	Vote Solar	332 S Michigan Ave FL 9 Chicago, IL 60604	Electronic Service	No	OFF_SL_23-117_Official List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Frank	Kohlasch	frank.kohlasch@state.mn.u s	MN Pollution Control Agency	520 Lafayette Rd N. St. Paul, MN 55155	Electronic Service	No	OFF_SL_23-117_Official List
Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
Nicolle	Kupser	nkupser@greatermngas.co m	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_23-117_Official List
Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce	401 N Robert Street Suite 150 St Paul, MN 55101	Electronic Service	No	OFF_SL_23-117_Official List
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Peder	Larson	plarson@larkinhoffman.co m	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_23-117_Official List
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Robert	Lems	administration@dmt- cgs.com	DMT Clear Gas Solutions	19125 SW 125th Ct Tualatin, OR 97062	Electronic Service	No	OFF_SL_23-117_Official List
Rachel	Leonard	rachel.leonard@ci.monticell o.mn.us	City of Monticello	505 Walnut St Ste 1 Monticello, MN 55362	Electronic Service	No	OFF_SL_23-117_Official List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro	360 Portage Ave FL 16 PO Box 815, Station M Winnipeg, MB R3C 2P4	Electronic Service tain	No	OFF_SL_23-117_Official List
Taylor	McNair	taylor@gridlab.org		668 Capp Street San Francisco, CA 94110	Electronic Service	No	OFF_SL_23-117_Official List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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David	Niles	david.niles@avantenergy.c om	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
Samantha	Norris	samanthanorris@alliantene rgy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_23-117_Official List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Greg	Palmer	gpalmer@greatermngas.co m	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_23-117_Official List
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Catherine	Phillips	Catherine.Phillips@wecene rgygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	Yes	OFF_SL_23-117_Official List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_23-117_Official List
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_23-117_Official List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Russ	Stark	Russ.Stark@ci.stpaul.mn.u s	City of St. Paul	Mayor's Office 15 W. Kellogg Blvd., S 390 Saint Paul, MN 55102	Electronic Service uite	No	OFF_SL_23-117_Official List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Jessica	Tritsch	jessica.tritsch@sierraclub.o rg	Sierra Club	2327 E Franklin Ave Minneapolis, MN 55406	Electronic Service	No	OFF_SL_23-117_Official List
Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC	700 Universe Blvd Juno Beach, FL 33408	Electronic Service	No	OFF_SL_23-117_Official List
Sam	Wade	sam@rngcoalition.com	Coalition for Renewable Natural Gas	1017 L Street #513 Sacramento, CA 95814	Electronic Service	No	OFF_SL_23-117_Official List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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