

January 9, 2026

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

RE: **Comments of the Minnesota Department of Commerce on CenterPoint Energy of Minnesota's 2025 Request for a Change in Contract Demand Entitlement - Errata**
Docket No. G008/M-25-72

Dear Ms. Bergman:

The Minnesota Department of Commerce (Department) respectfully submits to the Minnesota Public Utilities Commission (Commission) the following errata for the Department's Comments filed September 16th, 2025, in this docket.

The Department revisited its review of CenterPoint Energy of Minnesota's (CenterPoint, the Company) 2025-2026 design day calculation after the Company made a supplemental filing which included the correct public version of its 2025-2026 design day analysis on January 2, 2026.¹ Initially, that review demonstrated that the Department has used the correct 2025-2026 design day estimate of 1,544,100 Dth/Day that CenterPoint had provided in response to Department information requests on this topic. Hence, the Department concludes that its analysis regarding the Company's proposed 2025-2026 design day is consistent with CenterPoint's updated information.

Unfortunately, that review also identified one error in Table 3 the Department's comments. Table 3 sums CenterPoint's Design Day estimate and a physical reserve that is also included in its total Design Day estimate.² Department staff failed to update the 2024-2025 Design Day estimate included in Table 1 which resulted in an incorrect 2025-2026 Design Day estimate of 1,557,300 Dth/Day. The correct total for the Company's 2025-2026 Design Day estimate is 1,580,100 Dth/Day. The Department apologizes for this error.

¹ *Request for a Change in Demand Units*, Compliance Filing, January 2, 2026, Docket No. G0008/M-25-72 (eDockets) [20261-226416-01](#) (hereinafter "2026 Jan Compliance").

² *Request for a Change in Demand Units*, Department Comments, September 16, 2025, Docket No. G0008/M-25-72 at 13, (eDockets) [20259-223096-02](#) (hereinafter "Department Comments").

Except for the corrected information in Table 3, the Department's review concluded that the remainder of the 2025-2026 Design Day information in the filing is correct. The correction to the incorrect calculation in the original Table 3 is summarized in the following Corrected Table 3.

Table 3 – CORRECTED CenterPoint 2025-2026 Design Day Estimate Calculation (Dth/Day)

Description	CORRECTED Estimate (Dth/Day)	Original Estimate (Dth/Day)
Traditional Design Day (95 th Percentile)	1,544,100	1,544,100
Physical Reserve	36,000	36,000
Total	1,580,100	1,557,300

Department staff contacted Commission staff shortly after having identified this error to determine if the incorrect information that was the only issue Commission staff's review had noticed up to that point. Commission staff noted that some of the assumptions underlying the information included in Table 1 of the Department's comments were not clearly delineated and asked Department staff to review Table 1 and those assumptions to ensure they were correct and consistent.³

Department staff revisited the information in Table 1 per Commission staff's request and provides the following **CORRECTED** Table 1 and accompanying language which it hopes addresses Commission staff's questions.

The Department collected the information in Table 1 to provide a point of comparison for the large increase in rates between the previous and proposed agreements. The proposed agreement proposes a ~~62~~⁶¹ percent increase in the rates for marketer storage. Averaging that increase over 5 years would equal an approximate 12 percent annual increase **over the 2025 – 2030 period**. ~~While that average annual increase appears to be high given the current economic environment, it is interesting to note that it appears to be the second highest average annual percentage increase since 2011. That represents the highest average annual increase in storage rates for consecutive 2-to-5-year marketer storage agreements since at least 2011. The Department also calculated the average annual percentage rate increase for each of the agreements executed from November 2011 through May 1, 2030. The average annual percentage rate for each of the subsequent agreements has increased. The proposed agreement resulted in an average annual rate increase of almost 12 percent which also was well above all the earlier average annual increases calculated. The Department also calculate the overall average annual increase for the agreements effective between 2011 – 2022. It is approximately 10%.~~⁴

³ Department Comments, p. 11.

⁴ $((\$1.74 - 0.88)/0.88)/0.5$

CORRECTED Table 1 – Comparison of Short-term Marketer Storage Agreements Rates 2011-2030 ^{5, 6, 7, 8, 9, 10}

Vendor	Tenaska	Tenaska	Tenaska	BP Canada	BP Marketing	BP Marketing
Term (yrs)	3	2	3	3	2.5	5
Start Date	11/1/2011	11/1/2014	11/1/2016	11/1/2019	11/1/2022	5/1/2025
Quantity	5 Bcf	5 Bcf	10 Bcf	10 Bcf	10 Bcf	10 Bcf
Rate/Dth/Mon	0.88	0.88	1.04	1.48	1.74	2.81
% Change from Prior Agreement	NA	NA	18%	42%	18%	61%
% Avg. Ann. Increase from Nov 1, 2011-Nov 1, 2016		0%				
% Avg. Ann. Increase from Nov 1, 2011-Nov 1, 2019			2.3%			
% Avg. Ann. Increase from Nov 1, 2011-Nov 1, 2022				6.2%		
% Avg. Ann. Increase from Nov 1, 2011-May 1, 2025					7.2%	
% Avg. Ann. Increase from Nov 1, 2011-May 1, 2030						11.9%

This result suggests the average annual increase in the rates for short-term storage is increasing at an annual rate well above the Consumer Price Index (CPI) for example. The CPI only increased **3.0** percent on average over that same period.

IR 15 asked CenterPoint for the relevant information regarding the request for proposal and the bids submitted by the various vendors.¹¹ The Department reviewed that information and found it to be consistent with CPE's statements.

Given that the Company did competitively bid the contract, and the information summarized in **CORRECTED Table 1**, the Department **reluctantly** concludes the proposed agreement is reasonable and should be approved.

⁵ *In the Matter of CenterPoint Energy Minnesota Gas' Request for Change in Demand Units*, Petition, May 11, 2011, Docket No. G008/M-11-1078 Exhibit C at 1 (eDockets) [201111-67945-02](#).

⁶ *In the Matter of CenterPoint Energy Minnesota Gas' Request for Change in Demand Units*, Petition, July 1, 2016, Docket No. G008/M-16-571 at 1 (eDockets) [20167-122981-01](#).

⁷ *Ibid*, Petition at 1.

⁸ 2019-2020 CD Filing, Petition at **Trade Secret** Exhibit C1, May 1, 2019 (eDockets) [20195-152563-05](#).

⁹ 2022-2023 CD Filing, Petition Exhibit C2, June 29, 2022 (eDockets) [20226-186967-02](#).

¹⁰ Petition Exhibit C4 (eDockets) [20254-217131-01](#).

¹¹ See **Trade Secret** Attachment DOC-12 which contains a copy of IR 15.

The Department believes this erratum has identified all the necessary corrections for its comments in this docket and electronically filed this document with the Commission, and copies have been sent to the parties on the attached service list.

Sincerely,

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

JK/ad
Attachments

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
Errata

Docket No. G008/M-25-72

Dated this 9th day of January 2026

/s/Sharon Ferguson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Christina	Benning	christina.benning@centerpointenergy.com	CenterPoint Energy Minnesota Gas			Electronic Service		No	M-25-72
2	Sasha	Bergman	sasha.bergman@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 St. Paul MN, 55101 United States		Electronic Service		Yes	M-25-72
3	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	M-25-72
4	Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis MN, 55402 United States		Electronic Service		No	M-25-72
5	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	M-25-72
6	Seth	DeMerritt	seth.demerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis MN, 55402 United States		Electronic Service		No	M-25-72
7	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	M-25-72
8	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.	505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States		Electronic Service		No	M-25-72
9	Stacey	Murphree	stacey.murphree@centerpointenergy.com	CenterPoint Energy Minnesota Gas			Electronic Service		No	M-25-72
10	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	M-25-72
11	Donald	Wynia	donald.wynia@centerpointenergy.com	CenterPoint Energy	CenterPoint Energy 505 Nicollet Mall Minneapolis MN, 55402 United States		Electronic Service		No	M-25-72