



505 Nicollet Mall
PO Box 59038
Minneapolis, MN 55459-0038

August 26, 2025

VIA eFILING

Mr. Mike Bull
Acting Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2116

RE: CenterPoint Energy's Reply Comments in the Matter of CenterPoint Energy's 2024 Energy Conservation and Optimization Status Report, 2024 Demand Side Management Financial Incentive, 2024 Energy Conservation and Optimization Tracker Report, and 2025/2026 Conservation Cost Recovery Adjustment Docket No. G-008/M-25-43

Reply Comments

Dear Mr. Bull:

CenterPoint Energy Resources Corp., d/b/a/ CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or the "Company"), respectfully submits the following *Reply Comments* in response to the *Comments*¹ of the Staff of the Minnesota Department of Commerce, Division of Energy Resources ("Staff") on the Company's *2024 Demand-Side Management ("DSM") Financial Incentive Report, 2024 Energy Conservation and Optimization ("ECO") Tracker Report, and 2025/2026 Conservation Cost Recovery Adjustment ("CCRA") Proposal ("Petition")*.² CenterPoint Energy appreciates the time and effort expended by Staff in the analysis and review of the *Petition*.

CenterPoint Energy has reviewed the *Comments* and accepts without contention the following recommendations to the Minnesota Public Utilities Commission ("Commission")

¹ *In the Matter of CenterPoint Energy's 2024 Energy Conservation and Optimization Status Report*, Comments of the Minnesota Department of Commerce, Division of Energy Resources. Docket No. G-008/M-25-43, (August 14, 2025).

² CenterPoint Energy's 2024 Energy Conservation and Optimization Status Report, 2024 Demand-Side Management Financial Incentive Report, 2024 Energy Conservation and Optimization Tracker Report, and 2025/2026 Conservation Cost Recovery Adjustment Proposal Aggregate Compliance Filing, Docket No. G-008/M-25-43, *et. al*, (May 1, 2025).

- 1) Approve a 2024 DSM financial incentive of \$7,942,034 to be included in the Company's tracker account no sooner than the issue date of the Commission's Order in the docket;
- 2) Approve CenterPoint Energy's 2024 ECO tracker account activities with a December 31, 2024, ending balance of \$23,652,462;
- 3) Approve the revised gas CCRA of \$0.1885 per Dth for all of CenterPoint Energy's Minnesota customer classes, effective October 1, 2025, or the first billing cycle in the month following the Commission's Order, in this matter, whichever is later;
- 4) Approve the Company's bill message concerning its CCRA of \$0.01885 per therm;
- 5) Require CenterPoint Energy to submit a compliance filing with tariff sheets including all necessary calculations within 10 days of the issue date of this Order.

The Company appreciates the opportunity to offer these *Reply Comments*. Please contact me at (612) 321-4606 or martin.kapsch@centerpointenergy.com with any questions.

Sincerely,

/s/ Martin Kapsch

Martin Kapsch

Senior Regulatory Analyst, Energy Conservation and Optimization Programs

CenterPoint Energy

C: Service List

In the Matter of CenterPoint Energy's 2024 Energy Conservation and Optimization Status Report and Associated Compliance Filings	Docket No. G-008/M-25-43
August 26, 2025	Reply Comments

CERTIFICATE OF SERVICE

I, Martin Kapsch, served the attached *Reply Comments* of CenterPoint Energy on the attached service list for Docket No. G-008/M-25-43 by electronic service.

/s/ Martin Kapsch

Senior Regulatory Analyst, Energy Conservation and Optimization Programs
CenterPoint Energy

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Julie	Ambach	juliea@cmmmpa.org	Shakopee Public Utilities		255 Sarazin St Shakopee MN, 55379 United States	Electronic Service		No	M-25-43
2	Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company		PO Box 351 200 1st St SE Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	M-25-43
3	Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-43
4	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	M-25-43
5	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-43
6	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	M-25-43
7	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-25-43
8	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	M-25-43
9	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-25-43
10	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	M-25-43
11	Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.		7701 France Ave S Ste 600 Edina MN, 55435 United States	Electronic Service		No	M-25-43
12	Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.		823 E 7th St St. Paul MN, 55106 United States	Electronic Service		No	M-25-43
13	Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.		2377 Union Lake Trl Northfield MN, 55057 United States	Electronic Service		No	M-25-43

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	Melissa S	Feine	melissa.feine@semcac.org	SEMCAC		PO Box 549 204 S Elm St Rushford MN, 55971 United States	Electronic Service		No	M-25-43
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	M-25-43
16	Karolanne	Foley	karolanne.foley@dairylandpower.com	Dairyland Power Cooperative		PO Box 817 La Crosse WI, 54602-0817 United States	Electronic Service		No	M-25-43
17	Tyler	Glewwe	tyler.glewwe@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-43
18	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	M-25-43
19	Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-43
20	Jeffrey	Haase	jhaase@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-43
21	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	M-25-43
22	Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency		702 3rd Ave S Virginia MN, 55792 United States	Electronic Service		No	M-25-43
23	Martin	Kapsch	martin.kapsch@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-43
24	Deborah	Knoll	dknoll@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-43
25	Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas		null null, null United States	Electronic Service		No	M-25-43
26	Tina	Koecher	tkoecher@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	M-25-43
27	Martin	Lepak	martin.lepak@aeoa.org	Arrowhead Economic Opportunity		702 S 3rd Ave Virginia MN, 55792 United States	Electronic Service		No	M-25-43

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
28	Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission		1902 6th Ave E Hibbing MN, 55746 United States	Electronic Service		No	M-25-43
29	Josh	Mason	jmason@rpu.org	Rochester Public Utilities		4000 E River Rd NE Rochester MN, 55906 United States	Electronic Service		No	M-25-43
30	Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company		4902 N Biltmore Ln PO Box 77007 Madison WI, 53707-1007 United States	Electronic Service		No	M-25-43
31	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	M-25-43
32	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-43
33	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-43
34	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	M-25-43
35	Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	M-25-43
36	Bill	Poppert	info@technologycos.com	Technology North		2433 Highwood Ave St. Paul MN, 55119 United States	Electronic Service		No	M-25-43
37	Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024-9583 United States	Electronic Service		No	M-25-43
38	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-25-43
39	Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		No	M-25-43
40	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	M-25-43

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
41	Rick	Sisk	rsisk@trccompanies.com	Lockheed Martin		1000 Clark Ave. St. Louis MO, 63102 United States	Electronic Service		No	M-25-43
42	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	M-25-43
43	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	M-25-43
44	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-43
45	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-43
46	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	M-25-43
47	Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-43
48	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	M-25-43

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Julie	Ambach	juliea@cmmmpa.org	Shakopee Public Utilities		255 Sarazin St Shakopee MN, 55379 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
2	Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company		PO Box 351 200 1st St SE Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
3	Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
4	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
5	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
6	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
7	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
8	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
9	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		No	CIP SPECIAL SERVICE LIST
10	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
11	Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.		7701 France Ave S Ste 600 Edina MN, 55435	Electronic Service		No	CIP SPECIAL SERVICE LIST

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
12	Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.		823 E 7th St St. Paul MN, 55106 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
13	Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.		2377 Union Lake Trl Northfield MN, 55057 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
14	Melissa S	Feine	melissa.feine@semcac.org	SEMCAC		PO Box 549 204 S Elm St Rushford MN, 55971 United States	Electronic Service		No	CIP SPECIAL 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	CIP SPECIAL SERVICE LIST
16	Karolanne	Foley	karolanne.foley@dairylandpower.com	Dairyland Power Cooperative		PO Box 817 La Crosse WI, 54602-0817 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
17	Tyler	Glewwe	tyler.glewwe@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
18	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
19	Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
20	Jeffrey	Haase	jhaase@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
21	Joe	Hoffman	ja.hoffman@smmpa.org	SMPMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
22	Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency		702 3rd Ave S Virginia MN, 55792 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
23	Martin	Kapsch	martin.kapsch@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402	Electronic Service		No	CIP SPECIAL SERVICE LIST

[illegible]

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
35	Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
36	Bill	Poppert	info@technologycos.com	Technology North		2433 Highwood Ave St. Paul MN, 55119 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
37	Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024-9583 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
38	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		No	CIP SPECIAL SERVICE LIST
39	Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
40	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
41	Laura	Silver	laura.silver@state.mn.us		Department of Commerce	85 7th Place E, Suite 500 St. Paul MN, 55101 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
42	Rick	Sisk	rsisk@trccompanies.com	Lockheed Martin		1000 Clark Ave. St. Louis MO, 63102 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
43	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
44	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
45	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102	Electronic Service		No	CIP SPECIAL SERVICE LIST

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
46	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
47	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
48	Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
49	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST