

February 11, 2025

**PUBLIC DOCUMENT**

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

**RE: PUBLIC Comments of the Minnesota Department of Commerce on CenterPoint Energy of Minnesota's 2024 Annual Compliance Filing Regarding Winter Storm Uri - Errata**  
Docket Nos. G999/CI-21-135 and G008/M-21-138

Dear Mr. Seuffert:

The Minnesota Department of Commerce (Department) respectfully submits to the Minnesota Public Utilities Commission (Commission) the following errata for the Department's Comments filed November 27<sup>th</sup>, 2024 in these dockets.

The Department is submitting these errata to both the Trade Secret and Public versions of its comments due to errors identified in Tables 1 and 2 of those comments. Department staff incorrectly transcribed information related to CenterPoint Energy Minnesota's (CenterPoint, Company) 2023-2024 and 2024-2025 Winter Procurement Strategies. Except for the information in Tables 1 and 2 and the discussion of that information in the comments, the remainder of the filing remains the same. The corrections to the text are summarized in the following table.

Location	Original Text	Redlined Text	Corrected Text
Fourth full paragraph, p. 8.	The Department's review is summarized in Tables 1 and 2. Table 1 (following page) compares CPE's winter heating season procurement strategies for 2020-2021 and 2023-2024.	The Department's review is summarized in <u>Revised</u> Tables 1-a and 2-a. <u>Revised</u> Table 1-a (following page) compares CPE's winter heating season procurement strategies for 2020-2021 and 2023-2024.	The Department's review is summarized in Revised Tables 1-a and 2-a. Revised Table 1-a (following page) compares CPE's winter heating season procurement strategies for 2020-2021 and 2023-2024
First sentence, fifth full paragraph, p. 8.	Consistent with that approach, CenterPoint increased it baseload index price contracts from 21.05 million dekatherms in 2020 to 26.7 million dekatherms in 2023, an increase of 27%.	Consistent with that approach, CenterPoint increased it baseload index price contracts from 21.05 million dekatherms in 2020 to 26.0 million dekatherms in 2023, an increase of 13%.	Consistent with that approach, CenterPoint increased it baseload index price contracts from 21.05 million dekatherms in 2020 to 26.0 million dekatherms in 2023, an increase of 13%.
Second sentence, fifth paragraph, p. 8.	The amount of swing or spot gas purchased declined by 32% over that same time, which is also consistent with the concept of minimizing short-term price spike risk.	The amount of swing or spot gas purchased declined by 37% over that same time, which is also consistent with the concept of minimizing short-term price spike risk.	The amount of swing or spot gas purchased declined by 37% over that same time, which is also consistent with the concept of minimizing short-term price spike risk.
Fifth sentence, fifth paragraph p. 8.	The amount of peak shaving forecasted for both years is minimal to non-existent in Table 1.	The amount of peak shaving forecasted for both years is minimal to non-existent in <u>Revised</u> Table 1-a.	The amount of peak shaving forecasted for both years is minimal to non-existent in Revised Table 1-a.
First sentence, first paragraph, p. 9.	In summary, CPE increased the number of dekatherms covered by price stabilization by approximately 4.3 million or 9 percent between 2020-2021 and 2023-2024.	In summary, CPE increased the number of dekatherms covered by price stabilization by approximately 4.2 million or 8 percent between 2020-2021 and 2023-2024.	In summary, CPE increased the number of dekatherms covered by price stabilization by approximately 4.2 million or 8 percent between 2020-2021 and 2023-2024.
Second sentence, first paragraph, p. 9.	Over that same period, the quantity of dekatherms forecasted to be purchased decreased 0.8% or approximately 800,000 Dekatherms.	Over that same period, the quantity of dekatherms forecasted to be purchased decreased 2% or approximately 1.9 million dekatherms.	Over that same period, the quantity of dekatherms forecasted to be purchased decreased 2% or approximately 1.9 million dekatherms.

Second paragraph, p. 9.	Table 2 (following page) compares the 2023-2024 and 2024-2025 winter heating season plans.	<u>Revised Table 2-a</u> (following page) compares the 2023-2024 and 2024-2025 winter heating season plans.	Revised Table 2-a (following page) compares the 2023-2024 and 2024-2025 winter heating season plans.
Third paragraph, p. 9.	Table 2 shows CenterPoint continuing to increase the supply of Baseload Index Priced contracts by 400,000 dekatherms in the 2024-2025 heating season, while decreasing the amount of supply it purchases using Daily/Swing Supply by 1.5 million dekatherms.	<u>Revised Table 2-a</u> shows CenterPoint continuing to increase the supply of Baseload Index Priced contracts by <b>2.8 million</b> dekatherms in the 2024-2025 heating season, while decreasing the amount of supply it purchases using Daily/Swing Supply by <b>1.8 million</b> dekatherms. <u>These two changes were offset respectively by a 3.0 million dekatherm decrease in Hedged Baseload contracts and a 2.0 dekatherm increase in Storage.</u>	Revised Table 2-a shows CenterPoint continuing to increase the supply of Baseload Index Priced contracts by 2.8 million dekatherms in the 2024-2025 heating season, while decreasing the amount of supply it purchases using Daily/Swing Supply by 1.8 million dekatherms. These two changes were offset respectively by a 3.0 million dekatherm decrease in Hedged Baseload contracts and a 2.0 dekatherm increase in Storage.
Footnote 17, p. 9.	The 1.1 million dekatherm decrease in total system purchases between 2023 and 2024 accounts for the balance of the change.	<u>The Commission may want to explore how those changes affected CenterPoint's risk profile relative to short-term price spikes for the 2024-2025 heating season. The Department didn't complete that task as part of its review.</u>	The Commission may want to explore how those changes affected CenterPoint's risk profile relative to short-term price spikes for the 2024-2025 heating season. The Department didn't complete that task as part of its review.

Revised Trade Secret and Public Redlined versions of the Department's comments are included as Attachments 1-TS-R and 1-Pub-R. Revised Clean versions of the Trade Secret and Public versions of the Department's comments are included as Attachments 2-TS-C and 2-Pub-C. The Department is also including copies of the original Tables 1 and 2 as well as Revised Tables 1-a and 2-a. Changes to the amounts in Tables 1 and 2 are highlighted in yellow in Revised Tables 1-a and 2-a.

**Table 1 – Comparison of CPE’s Winter Procurement Strategies for 2020-2021 and 2023-2024 Winter Heating Seasons<sup>1</sup>**

Line No.	Purchases	2020-2021		2023-2024		Difference	
		Winter Plan		Winter Plan		Winter Plans	
		DTH	Percent	DTH	Percent	DTH	Percent
1.	Baseload/Hdgd	23,000,000	22.0%	26,000,000	25.1%	3,000,000	13%
2.	Baseload/FOM	21,050,000	20.2%	26,700,000	25.8%	5,650,000	27%
3.	Daily/Swing	33,339,302	32.0%	22,600,000	21.8%	(10,739,302)	-32%
4.	Storage	26,872,151	25.8%	28,200,000	27.3%	1,327,849	5%
5.	Peaking	75,123	0.1%	-	0.0%	(75,123)	-100%
6.	Total System Purchases	104,336,576	100%	103,500,000	100%	(836,576)	
7.	Transport	18,120,000		21,100,000		2,980,000	16%
8.	Total System Supply	122,456,576		124,600,000		2,143,424	2%
9.	Total Price Stabilization	49,947,274	47.9%	54,200,000	52.4%	4,252,726	9%

**Revised Table 1-a – Comparison of CPE’s Winter Procurement Strategies for 2020-2021 and 2023-2024 Winter Heating Seasons<sup>2</sup>**

Line No.	Purchases	2020-2021		2023-2024		Difference	
		Winter Plan		Winter Plan		Winter Plans	
		DTH	Percent	DTH	Percent	DTH	Percent
1.	Baseload/Hdgd	23,000,000	22.0%	26,000,000	25.4%	3,000,000	13%
2.	Baseload/FOM	21,050,000	20.2%	27,145,000	26.5%	6,095,000	29%
3.	Daily/Swing	33,339,302	32.0%	21,136,967	20.6%	(12,202,335)	-37%
4.	Storage	26,872,151	25.8%	28,162,556	27.5%	1,290,405	5%
5.	Peaking	75,123	0.1%	-	0.0%	(75,123)	-100%
6.	Total System Purchases	104,336,576	100%	102,444,523	100%	(1,892,053)	-2%
7.	Transport	18,120,000		23,560,000		5,440,000	30%
8.	Total System Supply	122,456,576		126,004,523		3,547,947	3%
9.	Total Price Stabilization	49,947,274	47.9%	54,162,556	53%	4,215,282	8%

<sup>1</sup> The Department included the comparison of the 2020-2021 and 2023-2024 winter procurement strategies since the January 2024 Pricing Event occurred during that period.

<sup>2</sup> The Department included the comparison of the 2020-2021 and 2023-2024 winter procurement strategies since the January 2024 Pricing Event occurred during that period.

**Table 2 – Comparison of CPE’s Winter Procurement Strategies for 2023-2024 and 2024-2025 Winter Heating Seasons**

Line No.	Purchases	2023-2024		2024-2025		Difference	
		Winter Plan		Winter Plan		Winter Plans	
		DTH	Percent	DTH	Percent	DTH	Percent
1.	Baseload/Hdgd	26,000,000	25.1%	26,000,000	25.4%	-	0%
2.	Baseload/FOM	26,700,000	25.8%	27,100,000	26.5%	400,000	1%
3.	Daily/Swing	22,600,000	21.8%	21,100,000	20.6%	(1,500,000)	-7%
4.	Storage	28,200,000	27.2%	28,200,000	27.5%	-	0%
5.	Peaking	-	0.0%	-	0.0%	-	NA
6.	Total System Purchases	103,500,000	100%	102,400,000	100%	(1,100,000)	-1%
7.	Transport	18,120,000		21,100,000		2,980,000	16%
8.	Total System Supply	121,620,000		123,500,000		1,880,000	2%
9.	Total Price Stabilization	54,200,000	52.4%	54,200,000	52.9%	-	0%

**Revised Table 2-a – Comparison of CPE’s Winter Procurement Strategies for 2023-2024 and 2024-2025 Winter Heating Seasons**

Line No.	Purchases	2023-2024		2024-2025		Difference	
		Winter Plan		Winter Plan		Winter Plans	
		DTH	Percent	DTH	Percent	DTH	Percent
1.	Baseload/Hdgd	26,000,000	25.4%	23,000,050	22.5%	(2,999,950)	-12%
2.	Baseload/FOM	27,145,000	26.5%	29,969,950	29.3%	2,824,950	10%
3.	Daily/Swing	21,136,967	20.6%	19,290,797	18.8%	(1,846,170)	-9%
4.	Storage	28,162,556	27.5%	30,130,169	29.4%	1,967,613	7%
5.	Peaking	-	0.0%	-	0.0%	-	NA
6.	Total System Purchases	102,444,523	100%	102,390,966	100%	(53,557)	0%
7.	Transport	23,560,000		23,405,000		(155,000)	-1%
8.	Total System Supply	126,004,523		125,795,966		(208,557)	0%
9.	Total Price Stabilization	54,162,556	53%	53,130,219	52%	(1,032,337)	-2%

The Department 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



#### *B.4 Natural Gas Integrated Resource Planning (Gas IRP)*

The Company discussed Gas IRP in some detail. Given the amount of attention the Commission has given this process over the last year or two, the Department doesn't see much value in summarizing CenterPoint's discussion of this topic.

#### *C. UPDATE ON CENTERPOINT'S EFFORTS TO MITIGATE THE RISK OF SHORT-TERM NATURAL GAS PRICE SPIKES*

The Department reconciles the Commission's ACF reporting requirements with the information the Company included in its 2024 ACF. The Department then reviews the Company's performance during the January 2024 Pricing Event to determine if CPE's modifications to lower ratepayers' risk from short-term price spikes has been successful.

##### *C.1 Procurement Practices*

The Department's review is summarized in Revised Tables 1-a and 2-a. Revised Table 1-a (following page) compares CPE's winter heating season procurement strategies for 2020-2021 and 2023-2024.

Consistent with that approach, CenterPoint increased its baseload index price contracts from 21.05 million dekatherms in 2020 to ~~26.7~~ 26.0 million dekatherms in 2023, an increase of ~~27~~ 13%. The amount of swing or spot gas purchased declined by ~~32~~ 37% over that same time, which is also consistent with the concept of minimizing short-term price spike risk.<sup>15</sup> CPE also increased its storage resources by 5% between 2020 and 2023. This change also worked in the direction of mitigating the risk of short-term price spikes. The amount of peak shaving forecasted for both years is minimal to non-existent in Revised Table 1-a. Given peak shaving's role in the supply mix is helpful to provide capacity to avoid purchasing incremental pipeline transportation for peak needs, but in light of the high capital costs associated with the construction of a new peaking facility, it is not surprising that CPE hasn't pursued this option to a greater extent. Transportation capacity on interstate or in-state pipelines (gas purchased during the heating season using different contract terms) is also considered in this list.

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<sup>15</sup> CenterPoint is unique among rate regulated natural gas distribution companies in Minnesota in that it submits a Gas Procurement Plan (GPP) annually that details its plans for meeting its winter season demand. The information for Table 1 is taken from those filings that were made on June 16, 2020, and September 27, 2023, in Docket no. G008/M-19-699.

**Revised Table 1-a – Comparison of CPE’s Winter Procurement Strategies for 2020-2021 and 2023-2024 Winter Heating Seasons**

16

Line No.	Purchases	2020-2021		2023-2024		Difference	
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4.	Storage	26,872,151	25.8%	28,162,556	27.5%	1,290,405	5%
5.	Peaking	75,123	0.1%	-	0.0%	(75,123)	-100%
6.	Total System Purchases	104,336,576	100%	102,444,523	100%	(1,892,053)	-2%
7.	Transport	18,120,000		23,560,000		5,440,000	30%
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9.	Total Price Stabilization	49,947,274	47.9%	54,162,556	53%	4,215,282	8%

In summary, CPE increased the number of dekatherms covered by price stabilization by approximately ~~4.3~~ **4.2** million or ~~9~~ **8** percent between 2020-2021 and 2023-2024. Over that same period, the quantity of dekatherms forecasted to be purchased decreased ~~0.8~~ **2%** or approximately ~~800,000~~ **1.9 million** dekatherms.

Revised Table 2-a (following page) compares the 2023-2024 and 2024-2025 winter heating season plans.

Revised Table 2-a shows CenterPoint continuing to increase the supply of Baseload Index Priced contracts by ~~400,000~~ **2.8 million** dekatherms in the 2024-2025 heating season, while decreasing the amount of supply it purchases using Daily/Swing Supply by ~~1.5~~ **1.8** million dekatherms. Those two changes were offset respectively by a 3.0 million dekatherm decrease in Hedged Baseload contracts and a 2.0 million dekatherm increase in Storage.<sup>17</sup>

CenterPoint also executed a contract with a new storage facility for the 2024-2025 winter heating season, that being Tenaska/East Cheyenne. This addition increased the Company’s Maximum Daily Withdrawal Quantity (MDWQ) to **[TRADE SECRET DATA HAS BEEN EXCISED]** Dth/day. The addition of this new underground storage contract resulted in CenterPoint being able to cover **[TRADE SECRET**

<sup>16</sup> The Department included the comparison of the 2020-2021 and 2023-2024 winter procurement strategies since the January 2024 Pricing Event occurred during that period.

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**HAS BEEN EXCISED]** of its design day from physical storage. The Company noted in its 2024 – 2025 Contract Demand Entitlement filing, Docket no. G008/M-24-146 that storage has become more and more difficult to contract for in the past few years.<sup>18</sup> This lack of the development of incremental physical storage for the Upper Midwest is concerning, particularly given that the third-party storage that CPE relies on is provided via multi-year contracts, which by their nature lapse periodically. Thus, the Company needs to evaluate and explore storage opportunities that would further stabilize the Company's supply portfolio continually.

**Revised Table 2-a – Comparison of CPE's Winter Procurement Strategies for 2023-2024 and 2024-2025 Winter Heating Seasons**

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3.	Daily/Swing	21,136,967	20.6%	19,290,797	18.8%	(1,846,170)	-9%
4.	Storage	28,162,556	27.5%	30,130,169	29.4%	1,967,613	7%
5.	Peaking	-	0.0%	-	0.0%	-	NA
6.	Total System Purchases	102,444,523	100%	102,390,966	100%	(53,557)	0%
7.	Transport	23,560,000		23,405,000		(155,000)	-1%
8.	Total System Supply	126,004,523		125,795,966		(208,557)	0%
9.	Total Price Stabilization	54,162,556	53%	53,130,219	52%	(1,032,337)	-2%

CenterPoint also noted in its filing on January 26, 2024, that “inventories in CenterPoint's storage assets were at their highest withdrawal deliverability” prior to the January 2024 Pricing Event.<sup>19</sup>

Order Point 6 of the Commission's February 17, 2023, Order requires affected utilities to discuss plans to incorporate more baseload purchases. The Department concludes that CenterPoint has complied with that reporting requirement.

## C.2 Update on Customer Communications

CenterPoint did update its parameters for curtailing its interruptible customers after the economic dispatch proposal it had supported in its CPP was not approve. The Company adopted the following parameters for curtailing its interruptible customers for economic reasons: 1) if the price exceeds 5 times the monthly WACOG and if the price exceeds \$25/Dth, CenterPoint will initiate customer conservation calls.<sup>20</sup>

<sup>18</sup> Docket No. G008/24-146, Public response to DER IR #5 which is included as Public Attachment 2.

<sup>19</sup> CPE Compliance filing filed January 26, 2024, at p 3.

<sup>20</sup> These are the same parameters the Commission adopted in Order Point 3 in its February 17<sup>th</sup> Order.



#### *B.4 Natural Gas Integrated Resource Planning (Gas IRP)*

The Company discussed Gas IRP in some detail. Given the amount of attention the Commission has given this process over the last year or two, the Department doesn't see much value in summarizing CenterPoint's discussion of this topic.

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5.	Peaking	75,123	0.1%	-	0.0%	(75,123)	-100%
6.	Total System Purchases	104,336,576	100%	102,444,523	100%	(1,892,053)	-2%
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Revised Table 2-a shows CenterPoint continuing to increase the supply of Baseload Index Priced contracts by 2.8 million dekatherms in the 2024-2025 heating season, while decreasing the amount of supply it purchases using Daily/Swing Supply by 1.8 million dekatherms. Those two changes were offset respectively by a 3.0 million dekatherm decrease in Hedged Baseload contracts and a 2.0 million dekatherm increase in Storage.<sup>17</sup>

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and more difficult to contract for in the past few years.<sup>18</sup> This lack of the development of incremental physical storage for the Upper Midwest is concerning, particularly given that the third-party storage that CPE relies on is provided via multi-year contracts, which by their nature lapse periodically. Thus, the Company needs to evaluate and explore storage opportunities that would further stabilize the Company's supply portfolio continually.

**Revised Table 2-a – Comparison of CPE's Winter Procurement Strategies for 2023-2024 and 2024-2025 Winter Heating Seasons**

Line No.	Purchases	2023-2024		2024-2025		Difference	
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4.	Storage	28,162,556	27.5%	30,130,169	29.4%	1,967,613	7%
5.	Peaking	-	0.0%	-	0.0%	-	NA
6.	Total System Purchases	102,444,523	100%	102,390,966	100%	(53,557)	0%
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<sup>19</sup> CPE Compliance filing filed January 26, 2024, at p 3.

<sup>20</sup> These are the same parameters the Commission adopted in Order Point 3 in its February 17<sup>th</sup> Order.

## **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  
Public Errata**

**Docket No. G999/CI-21-135 and G008/M-21-138**

Dated this **11<sup>th</sup>** day of **February 2025**

**/s/Sharon Ferguson**





#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
27	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	21-135Official Service List
28	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	21-135Official Service List
29	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
30	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
31	Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
32	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-135Official Service List
33	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	21-135Official Service List
34	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	21-135Official Service List
35	Amy	Liberkowsky	amy.a.liberkowsky@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	21-135Official Service List
36	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	21-135Official Service List
37	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
38	Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	21-135Official Service List
39	Sarah	Mead	sarah.mead@wecenergygroup.com	MERC		null null, null United States	Electronic Service		No	21-135Official Service List
40	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General -	Bremer Tower, Suite 1400	Electronic Service		No	21-135Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
					Residential Utilities Division	445 Minnesota Street St Paul MN, 55101-2131 United States				Service List
41	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	21-135Official Service List
42	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	21-135Official Service List
43	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
44	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
45	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	21-135Official Service List
46	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	21-135Official Service List
47	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-135Official Service List
48	Lisa	Peterson	lisa.r.peterson@xcelenergy.com			414 Nicollet Mall FL 7 Minneapolis MN, 55401 United States	Electronic Service		No	21-135Official Service List
49	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	21-135Official Service List
50	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	21-135Official Service List
51	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	21-135Official Service List
52	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
53	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney	Suite 1400 445	Electronic Service		No	21-135Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
					General - Residential Utilities Division	Minnesota Street St. Paul MN, 55101-2131 United States				Service List
54	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States	Electronic Service		No	21-135Official Service List
55	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	21-135Official Service List
56	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	21-135Official Service List
57	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	21-135Official Service List
58	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
59	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
60	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	21-135Official Service List
61	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
62	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
63	Kent	Sulem	ksulem@mmua.org			3131 Fernbrook Ln N Ste 200 Plymouth MN, 55447-5337 United States	Electronic Service		No	21-135Official Service List
64	Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine		225 S 6th St Ste 3500 Capella Tower Minneapolis MN, 55402-4629 United States	Electronic Service		No	21-135Official Service List
65	Casey	Whelan	cwhelan@kinectenergy.com	Kinect Energy Group		605 Highway 169 N Ste 1200 Plymouth MN, 55441 United States	Electronic Service		No	21-135Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
66	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
67	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	21-135Official Service List
68	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Jorge	Alonso	jorge.alonso@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	21-138Official Service List
2	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		Yes	21-138Official Service List
3	James H.	Barkley	james.barkley@bakerbotts.com	Baker Botts		910 Louisiana Street Houston TX, 77002-4995 United States	Electronic Service		No	21-138Official Service List
4	Jessica	Barnard	jessica.barnard@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-138Official Service List
5	James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	21-138Official Service List
6	Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		Yes	21-138Official Service List
7	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	21-138Official Service List
8	Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-138Official Service List
9	Barbara	Case	barbara.case@state.mn.us		Office of Administrative Hearings	600 N. Robert St. St. Paul MN, 55101 United States	Electronic Service		No	21-138Official Service List
10	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	21-138Official Service List
11	Seth	DeMerritt	seth.demerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-138Official Service List
12	Richard	Dornfeld	richard.dornfeld@ag.state.mn.us		Office of the Attorney General -	Minnesota Attorney General's	Electronic Service		No	21-138Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
					Department of Commerce	Office 445 Minnesota Street, Suite 1800 Saint Paul MN, 55101 United States				Service List
13	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	21-138Official Service List
14	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	21-138Official Service List
15	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	21-138Official Service List
16	Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY		401 Nicollet Mall FL 8 Minneapolis MN, 55401 United States	Electronic Service		Yes	21-138Official Service List
17	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	21-138Official Service List
18	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 United States	Electronic Service		No	21-138Official Service List
19	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Suite 1400 St. Paul MN, 55101-2134 United States	Electronic Service		No	21-138Official Service List
20	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	21-138Official Service List
21	Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-138Official Service List
22	Andrew	Larson	andrew.m.larson@state.mn.us		Public Utilities Commission	121 7th Place E., #350	Electronic Service		Yes	21-138Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Saint Paul MN, 55101 United States				Service List
23	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	21-138Official Service List
24	Kathryn	Lloyd	kathy.lloyd@centerpointenergy.com	CenterPoint Energy		null null, null United States	Electronic Service		No	21-138Official Service List
25	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	21-138Official Service List
26	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	21-138Official Service List
27	David	Moeller	dmoeller@allte.com	Minnesota Power			Electronic Service		No	21-138Official Service List
28	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-138Official Service List
29	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	21-138Official Service List
30	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	21-138Official Service List
31	Lisa	Peterson	lisa.r.peterson@xcelenergy.com			414 Nicollet Mall FL 7 Minneapolis MN, 55401 United States	Electronic Service		No	21-138Official Service List
32	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		Yes	21-138Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
33	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. Paul MN, 55101-2131 United States	Electronic Service		Yes	21-138Official Service List
34	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-138Official Service List
35	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States	Electronic Service		Yes	21-138Official Service List
36	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	21-138Official Service List
37	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	21-138Official Service List
38	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-138Official Service List
39	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	21-138Official Service List
40	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	21-138Official Service List
41	James M	Strommen	jstrommen@kenedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	21-138Official Service List
42	Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine		225 S 6th St Ste 3500 Capella Tower Minneapolis MN, 55402-4629 United States	Electronic Service		No	21-138Official Service List
43	James	Worlobah	james.worlobah@state.mn.us		Public Utilities Commission	121 7th Place E, Suite 350	Electronic Service		No	21-138Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						St. Paul MN, 55101 United States				Service List
44	Michael A.	Yuffee	michael.yuffee@bakerbotts.com	Baker Botts		700 K St NW Washington DC, 20001 United States	Electronic Service		No	21-138Official Service List