

November 15, 2024

**PUBLIC DOCUMENT**

Will Seuffert  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, Minnesota 55101-2147

RE: **PUBLIC** Response Comments of the Minnesota Department of Commerce  
Docket No. G008/M-24-146

Dear Mr. Seuffert:

Attached are the **PUBLIC** response comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) regarding the:

- April 1, 2024, petition;
- August 16, 2024, reply comments, and;
- November 1, 2024, supplemental filing;

by CenterPoint Energy Minnesota Gas (CenterPoint or the Company) in Docket No. G008/M-24-146, requesting approval for change in demand units.

The Department recommends **approval** and is available to answer any questions the Minnesota Public Utilities Commission (Commission) may have.

Sincerely,

/s/ Peter Wyckoff, Ph.D.  
Deputy Commissioner, Division of Energy Resources

JK/AU/ad  
Attachment



## Before the Minnesota Public Utilities Commission

### PUBLIC Comments of the Minnesota Department of Commerce

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Docket No. G008/M-24-146

#### I. INTRODUCTION

Pursuant to Minnesota Rules 7825.2910, subpart 2,<sup>1</sup> CenterPoint Energy Minnesota Gas (CenterPoint, CPE, or the Company) filed a petition requesting a change in demand<sup>2</sup> units on April 1, 2024.<sup>3</sup>

On July 31, 2024, the Minnesota Department of Commerce, Division of Energy Resources (Department) filed comments.<sup>4</sup> The Department's initial comments preliminarily recommended the Commission:

- Accept CenterPoint's proposed estimated 2024-2025 design-day.
- Approve the recovery of demand costs resulting from the rate increases caused by the settlement in Viking's FERC rate case, and the rate increases resulting from contract changes in the agreements with NNG for non-discounted firm service effective April 1, 2024, for the April 2024-March 2025 period through its monthly Purchased Gas Adjustments.
- Find that CenterPoint has complied with the reporting requirements included in the Commission's March 4, 2024, Order regarding the performance of the Company's asset management agreements on the coldest days of the winter heating season.
- Approve the Company's request for preliminary approval to update the swing reservation fees on November 1, 2024.
- Take no action on the Company's request for variance to Minnesota R. 7825.2910 Subpart 2.

In addition, the Department deferred making a recommendation on the following topics until it had an opportunity to review CenterPoint's reply comments:

- The Company's request for recovery of the costs resulting from the Tenaska/East Cheyenne storage agreement.
- CenterPoint's efforts to comply with the reporting requirements included in the Commission's February 17, 2023, Order in Docket No. G008/M-21-138.

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<sup>1</sup> "Filing upon a change in demand. Gas utilities shall file for a change in demand to increase or decrease demand, to redistribute demand percentages among classes, or to exchange one form of demand for another."

<sup>2</sup> Also called entitlement, capacity, or transportation on the pipeline.

<sup>3</sup> CenterPoint Energy Minnesota Gas, Initial Filing – Demand Entitlement 2024-2025, April 1, 2024, (eDockets) [20244-204842](#), (hereinafter "Petition").

<sup>4</sup> Department of Commerce Department of Energy Resources, Comments, July 31, 2024, (eDockets) [20247-209152](#), (hereinafter "Department's initial comments").

On August 16, 2024, CenterPoint filed reply comments<sup>5</sup> providing additional information. On November 1, 2024, CenterPoint filed a supplemental filing<sup>6</sup>. The Company is requesting the Commission approve its proposed change in demand units as updated in their reply comments and supplemental filing, calculated to reflect an April 1, 2024, implementation date.

Below, the Department responds to CenterPoint's reply comments and supplemental filing with additional analysis and provides its final recommendations.

## II. DEPARTMENT ANALYSIS

### A. CENTERPOINT RESPONSES TO DEPARTMENT REQUESTS FOR ADDITIONAL INFORMATION

#### A.1. FIRST REQUEST FOR ADDITIONAL INFORMATION

The Department's July 31, 2024, comments requested CenterPoint provide additional information on the costs and benefits of the Tenaska/East Cheyenne storage agreement relative to potential gas price spikes.

The Company provided two illustrations showing the potential future effect of the Tenaska/East Cheyenne storage agreement. The first illustration depicts a "theoretical example of what a futures look is on 'Inside FERC, First-of-the-Month, NNG-Demarc' settlements for the summer months, creating a Summer weighted average cost of gas (WACOG), versus the Winter months from April 2024 to December 2028".<sup>7</sup>

The information in CenterPoint Figure 1 (following page) is illustrative of the difference in price risk between the summer and winter seasons. It demonstrates the benefit of price risk mitigation for CenterPoint's customers provided by underground storage. The Department appreciates the Company providing this information in its reply comments.

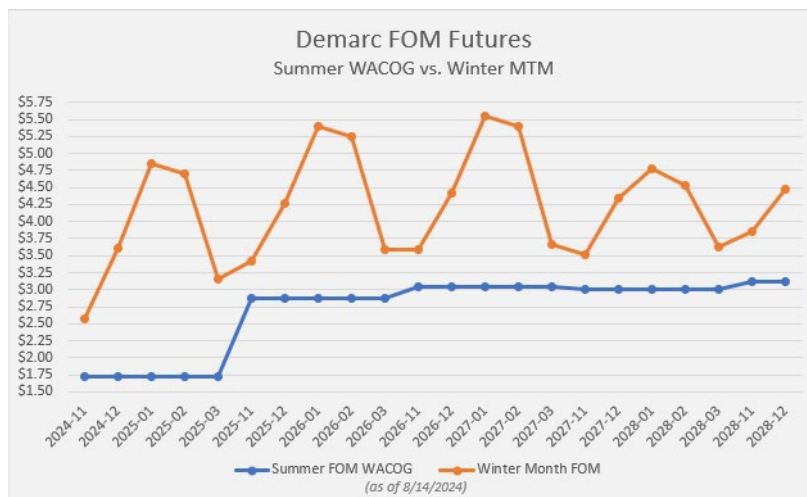
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<sup>5</sup> CenterPoint Energy Minnesota Gas, Reply Comments, August, 16, 2024, (eDockets) [20248-209577](#), (hereinafter "reply comments").

<sup>6</sup> CenterPoint Energy Minnesota Gas, Other-Demand Entitlement 2024-2025 Supplement, November 1, 2024, (eDockets) [202411-211540](#), (hereinafter "supplemental filing").

<sup>7</sup> Reply Comments, at 3.

**CenterPoint Figure 1: Demarc FOM Futures<sup>8</sup>**



The second illustration depicts “a theoretical example of what savings CenterPoint could potentially endure in the future having the East Cheyenne storage in place with max withdrawal deliverability and a repeat event happened with the daily price spikes from Winter Storm Uri”<sup>9</sup> in the years 2025 to 2029. This illustration is also based on the “Inside FERC, First-of-the-Month NNG-Demarc” futures settlements, which creates a summer WACOG. The summer WACOG is compared to the gas daily settlements of NNG-Demarc on the dates of Winter Storm Uri, February 12 through February 21, 2021.

**CenterPoint Table 1: Hypothetical Future Avoided Costs Under Tenaska Agreement<sup>10</sup>**

Year	Sum of Summer WACOG	Sum of Uri GDD	Sum of Storage Savings
2025	\$552,744	\$33,509,100	\$32,956,356
2026	\$862,380	\$33,509,100	\$32,646,720
2027	\$915,120	\$33,509,100	\$32,593,980
2028	\$901,230	\$33,509,100	\$32,607,870
2029	\$934,020	\$33,509,100	\$32,575,080
<b>Grand Total</b>	<b>\$4,165,494</b>	<b>\$167,545,500</b>	<b>\$163,380,006</b>

The above table assumes a significant weather event, like Winter Storm Uri, every year for the next five years. Under that assumption, CenterPoint is showing a potential five-year savings of \$163.4 million. Under this assumption, the average savings in a single year with a significant weather event like Winter Storm Uri, occurring in the next 5 years, would be approximately \$32.7 million.<sup>11</sup>

While less than the Department’s estimate included in its comments, the Tenaska/East Cheyenne storage agreement does provide value relative to price risk mitigation.

<sup>8</sup> Reply Comments, *Id.*

<sup>9</sup> Reply Comments, *Id.*

<sup>10</sup> Reply Comments, *Id.*

<sup>11</sup> \$163,380,006/5 = \$32,676,001.

The Department's initial comments also identified two analyses that might help determine the value of a new proposed storage agreement, these analyses can be found in the Department's initial comments Exhibit 3 and TRADE SECRET Table 13. The Department requested that the Company review the information in both figures to verify that the information the Department collected and/or calculated is correct. The Company's response to this request along with the Department's final recommendation on the recovery of the costs resulting from the Tenaska/East Cheyenne storage agreement can be found in the following sections that address the Department's third and fourth requests for additional information.

#### *A.2. SECOND REQUEST FOR ADDITIONAL INFORMATION*

The Commission's February 17, 2023, Order in Docket No. G008/M-21-138<sup>12</sup> required CenterPoint, in future contract demand entitlement filings, to discuss how changes to their pipeline capacity affect their supply diversity. Additionally, if pipeline capacity comes at a cost premium but increases supply diversity, provide a meaningful cost/benefit discussion of the tradeoff, including a comparison with the least-cost capacity option. The Company notes that the Tenaska/East Cheyenne agreement is a result of this ongoing effort.

The Department's July 31, 2024, comments requested CenterPoint provide a discussion regarding each of the three topics included in the reporting requirements included in the February 17, 2023, Order:

- How changes to pipeline capacity can affect supplier diversity;
- If pipeline capacity comes at a cost premium but increases supplier diversity; and
- Proved a meaningful cost-benefit analysis of the tradeoff, including a comparison with the least-cost capacity option.

##### *A.2.1. How changes to pipeline capacity can affect supplier diversity*

The Company notes the following:

Adding pipeline or storage capacity, in this case East Cheyenne storage, creates diversity in the sense that the transaction is tied to a different geographical storage field located in Logan County, CO, delivered into NNG at NNG-Demarc which is a different supply receipt point than CenterPoint's other storage agreements, and tied to a different supplier than the Company's current marketer storage, Tenaska. In summary, the

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<sup>12</sup> *In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions*, CenterPoint Energy Minnesota Gas, Order – Requiring Actions to Mitigate Impacts from Future Natural Gas Price Spikes, Setting Filing Requirements, and Initiation a Proceeding to Establish Gas Resource Planning Requirements, February 17, 2023, Docket No. G008/M-21-138, (eDockets) 20232-193249-01, at 23 (hereinafter “February 17, 2023, Order”).

below chart is a listing of all storage agreements and each corresponding index and geographical location:<sup>13</sup>

**CenterPoint Table 2: Storage Agreements<sup>14</sup>**

Storage Type	Index	Location
NNG	Blend of supply on NNG (NNG-Ventura, NNG-Demarc, VGT-Emerson)	Kansas/Iowa
NGPL	NGPL – Midcon Pool	Illinois/Iowa
Marketer Storage (BP)	NNG – Ventura	Virtual
East Cheyenne	NNG-Demarc	Colorado

Based on the Company's response above, the Department concludes this filing requirement is satisfied.

*A.2.2. If pipeline capacity comes at a cost premium but increases supplier diversity*

The Company responds with the following:

Diversifying the Company's marketer storage portfolio to supply tied to different receipt points introduces price diversity and supply diversity. If for some reason, there are pipeline constraints at any of the receipt points causing deliverability issues (ex. Force majeure during a cold event) not all storage deliverability would be impacted.<sup>15</sup>

Based on the Company's response above, the Department concludes this filing requirement is satisfied.

*A.2.3. Provide a meaningful cost-benefit analysis of the tradeoff, including a comparison with the least-cost capacity option.*

Regarding the East Cheyenne storage agreement, the Company states in their reply comments that there is no reasonable tradeoff to analyze to show a least cost capacity option.<sup>16</sup>

Consistent with the Department's initial comments, the Department recognizes that it wasn't possible for CenterPoint to provide a meaningful cost-benefit analysis of the trade-off due to the absence of a competitive alternative. However, the Department addresses two analyses that help determine the value of the Tenaska/East Cheyenne agreement in the following section.

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<sup>13</sup> Reply Comments, at 5.

<sup>14</sup> Reply Comments, *Id.*

<sup>15</sup> Reply Comments, *Id.*

<sup>16</sup> Reply Comments, *Id.*

*A.3. DEPARTMENT REQUEST NO. 3 AND 4*

The Department's initial comments identified two analyses that provided preliminary estimates of the value of a new proposed storage agreement. In **TRADE SECRET** Exhibit 3, the Department provided an estimate of the hypothetical avoided costs for CenterPoint assuming an event identical to Winter Storm Uri occurred. The results of that analysis were notable. In **TRADE SECRET** Table 13, the Department provided a summary of CenterPoint's third-party underground storage agreements and then compared the percentage of the Company design day estimate that would be covered by gas in storage. The Department requested that the Company review the information in both analyses to verify that the information the Department collected and/or calculated is correct.

In the Company's reply comments, CenterPoint agreed with the logic presented in Exhibit 3 and **TRADE SECRET** Table 13. However, they noted "without being provided the intricate details behind the savings calculations the Company cannot confirm accuracy of the calculations".<sup>17</sup> The Department followed up with CenterPoint informally and provided the Excel file that estimated the potential savings calculation developed in **TRADE SECRET** Exhibit 3. CenterPoint noted a couple of small changes it would have recommended but didn't find the Department's calculation to be flawed or unreasonable.

As noted in the Department's initial comments, the second analysis the Department identified was a table that listed information regarding the Company's different storage contracts. CenterPoint provided a similar analysis in its Demand Entitlement filing submitted July 3, 2017, in Docket G008/M-17-533. The Department's initial comments, **TRADE SECRET** Table 13, summarizes this information.

During its interactions with Minnesota's five regulated natural gas local distribution companies (LDCs) over the past several months the Department has asked each of them separately about the current market for underground storage. Every LDC the Department polled provided a response like CenterPoint's. The consensus is that storage on Northern Natural Gas Interstate Pipeline (NNG) is fully subscribed as is the storage on the other interstate pipelines that supply Minnesota.

Given this information, the Department's conclusion is that the Company's calculation of the potential value of the price mitigation associated with the Tenaska/East Cheyenne storage agreement in Table 1 provides an analysis that demonstrates some of the costs and benefits associated with that Agreement. While it is not a complete cost benefit analysis, given the current situation where spot prices for natural gas have achieved prices not previously considered possible, CenterPoint's efforts to comply with that Commission reporting requirement is sufficient.

*B. CENTERPOINT SUPPLEMENTAL FILING*

In CenterPoint's supplemental filing, the Company updated the supplier demand/seasonal swing reservation for the 2024-2025 winter season. This information was unknown then the initial petition was filed.

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<sup>17</sup> Reply Comments, at 6.

CenterPoint notes the following changes to seasonal reservation fees:<sup>18</sup>

- Updates to its annual Supplier Demand Profile, which contains contracts for seasonal swing supplies. These expenses are incurred regardless of how much gas is called upon over the winter season. Costs are allocated 75% to demand and 25% to commodity. The total demand allocation was reduced by \$343,997, from **[TRADE SECRET DATA HAS BEEN EXCISED]**.<sup>19</sup> The Company notes that changes will be reflected in the Company's November 2024 Purchase Gas Adjustment billing rates.
- NGPL storage demand was reduced from **[TRADE SECRET DATA HAS BEEN EXCISED]**, or \$38,890 per contracted rates with NGPL.<sup>20</sup>

Due to the updates noted above, the annual demand costs decreased by \$382,887 when compared to the originally proposed annual demand costs. The customer bill impact has decreased from \$1.4475/Dth to \$1.4443/Dth, or about \$0.0032/Dth. The annual impact for a residential customer using 89.0 Dekatherms<sup>21</sup> would see a \$0.28 decrease as of Nov. 1, 2024.<sup>22</sup>

The Company provided an updated historic price changes analysis in the supplemental filing.<sup>23</sup> The Department re-created Attachment 2 from the Department's initial comments to reflect the seasonal reservation fee updates. The Department's results were consistent with CenterPoint's results.<sup>24</sup> CenterPoint's proposed changes effective November 1, 2024, would result in the following annual rate impacts:

**Department Table 1: Annual Demand Cost Rate Impact<sup>25</sup>**

Rate Schedule	Annual Usage (Dth/yr.)	Annual Demand Cost Change (\$)	Percentage Change
Residential	89	(\$0.28)	-0.22%
Comm/Ind. Firm A	81	(\$0.26)	-0.22%
Comm/Ind. Firm B	730	(\$2.34)	-0.22%
Comm/Ind. Firm C	12,076	(\$38.64)	-0.22%
Large General Service	47,751	(\$238.23)	-0.22%

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<sup>18</sup> Supplemental Filing, at 1-2.

<sup>19</sup> Supplemental Filing, Exhibit A.

<sup>20</sup> *Id.*

<sup>21</sup> Per-customer sales volume estimate authorized in the Company's 2021 Rate Case – Docket No. G008/GR-21-435.

<sup>22</sup> Supplemental Filing, at 2.

<sup>23</sup> Supplemental Filing, Exhibit B4.

<sup>24</sup> Attachment 1 contains the Department's analysis.

<sup>25</sup> Supplemental Filing, Exhibit B4.



Based on its analysis, the Department recommends the Commission approve the updated proposed demand costs with effective date of November 1, 2024. The Department also notes that CenterPoint's Demand Cost of Gas has increased approximately 12% since the Company's most recently approved general rate case.<sup>26</sup>

### III. DEPARTMENT RECOMMENDATIONS

The Department appreciates the opportunity to comment further on the Company's Petition. The Department makes the following, final recommendations (new recommendations or edits to previous recommendations are underlined):

- Accept CenterPoint's proposed estimated 2024-2025 design-day.
- Approve the recovery of demand costs resulting from the rate increases caused by the settlement in Viking's FERC rate case, and the rate increases resulting from contract changes in the agreements with NNG for non-discounted firm service effective April 1, 2024, for the April 2024 - October 2024 period through its monthly Purchased Gas Adjustments.
- Find that CenterPoint has complied with the reporting requirements included in the Commission's March 4, 2024, Order regarding the performance of the Company's asset management agreements on the coldest days of the winter heating season.
- Take no action on the Company's request for variance to Minnesota R. 7825.2910 Subpart 2.
- Allow CenterPoint to recover associated demand costs for the November 2024-March 2025 period through the monthly Purchased Gas Adjustment effective November 1, 2024.
- Approve the Company's request for recovery of the costs resulting from the Tenaska/East Cheyenne storage agreement.
- Find that CenterPoint has complied with the reporting requirements included in the Commission's February 17, 2023, Order in Docket No. G008/M-21-138.

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<sup>26</sup> *In the Matter of the Application by CenterPoint Energy Resources Corp d/b/a CenterPoint Energy Minnesota Gas for Authority to Increase Natural Gas Rates in Minnesota*, CenterPoint Energy Minnesota Gas, Order – Accepting and Adopting Agreement Setting Rate, September 23, 2022, Docket No. G008/GR-21-435, (eDockets) 20299-189265-01.

**Department Attachment 2**  
**Docket No. G008/M-24-146**  
**CenterPoint Rate and Annual Bill Impacts**

	Last Rate Case (G008/MR-21-435)	Last Demand Change April 1, 2024 (G008/M-24-146)	October 1, 2024 (G008/AA-24-62)	November 1, 2024 (G008/M-24-146)	Change From Last Rate Case	Change From Last Demand Change	Percent Change (%) From Most Recent PGA	Change (\$) From Most Recent PGA
<b>Residential</b>								
Commodity Cost of Gas (WACOG) (4)	\$4.2905	\$1.6802	\$2.4740	\$2.6289	-38.73%	56.46%	6.26%	\$0.1549
Demand Cost of Gas (1)	\$1.2888	\$1.4475	\$1.4475	\$1.4443	12.07%	-0.22%	-0.22%	(\$0.0032)
Commodity Margin (2) (3) (5)	\$2.5043	\$2.9019	\$2.9019	\$2.9019	15.88%	0.00%	0.00%	\$0.0000
Total Cost of Gas	\$8.0836	\$6.0296	\$6.8234	\$6.9751	-13.71%	15.68%	2.22%	\$0.1517
Average Annual Usage (Dk)	89	89	89	89				
Average Annual Total Cost of Gas	\$719.44	\$536.63	\$607.28	\$620.78	-13.71%	15.68%	2.22%	\$13.50
Average Annual Total Demand Cost of Gas								(\$0.28)

	Last Rate Case (G008/MR-21-435)	Last Demand Change April 1, 2024 (G008/M-24-146)	October 1, 2024 (G008/AA-24-62)	November 1, 2024 (G008/M-24-146)	Change From Last Rate Case	Change From Last Demand Change	Percent Change (%) From Most Recent PGA	Change (\$) From Most Recent PGA
<b>Commercial/Industrial Firm - A</b>								
Commodity Cost of Gas (WACOG) (4)	\$4.2905	\$1.6802	\$2.4740	\$2.6289	-38.73%	56.46%	6.26%	\$0.1549
Demand Cost of Gas (1)	\$1.2888	\$1.4475	\$1.4475	\$1.4443	12.07%	-0.22%	-0.22%	(\$0.0032)
Commodity Margin (2) (3) (5)	\$2.6411	\$3.8897	\$3.8897	\$3.8897	47.28%	0.00%	0.00%	\$0.0000
Total Cost of Gas	\$8.2204	\$7.0174	\$7.8112	\$7.9629	-3.13%	13.47%	1.94%	\$0.1517
Average Annual Usage (Dk)	81	81	81	81				
Average Annual Total Cost of Gas	\$665.85	\$568.41	\$632.71	\$644.99	-3.13%	13.47%	1.94%	\$12.29
Average Annual Total Demand Cost of Gas								(\$0.26)

	Last Rate Case (G008/MR-21-435)	Last Demand Change April 1, 2024 (G008/M-24-146)	October 1, 2024 (G008/AA-24-62)	November 1, 2024 (G008/M-24-146)	Change From Last Rate Case	Change From Last Demand Change	Percent Change (%) From Most Recent PGA	Change (\$) From Most Recent PGA
<b>Commercial/Industrial Firm - B</b>								
Commodity Cost of Gas (WACOG) (4)	\$4.2905	\$1.6802	\$2.4740	\$2.6289	-38.73%	56.46%	6.26%	\$0.1549
Demand Cost of Gas (1)	\$1.2888	\$1.4475	\$1.4475	\$1.4443	12.07%	-0.22%	-0.22%	(\$0.0032)
Commodity Margin (2) (3) (5)	\$2.0380	\$2.4691	\$2.4712	\$2.4712	21.26%	0.09%	0.00%	\$0.0000
Total Cost of Gas	\$7.6173	\$5.5968	\$6.3927	\$6.5444	-14.09%	16.93%	2.37%	\$0.1517
Average Annual Usage (Dk)	730	730	730	730				
Average Annual Total Cost of Gas	\$5,560.63	\$4,085.66	\$4,666.67	\$4,777.41	-14.09%	16.93%	2.37%	\$110.74
Average Annual Total Demand Cost of Gas								(\$2.34)

	Last Rate Case (G008/MR-21-435)	Last Demand Change April 1, 2024 (G008/M-24-146)	October 1, 2024 (G008/AA-24-62)	November 1, 2024 (G008/M-24-146)	Change From Last Rate Case	Change From Last Demand Change	Percent Change (%) From Most Recent PGA	Change (\$) From Most Recent PGA
<b>Commercial/Industrial Firm - C</b>								
Commodity Cost of Gas (WACOG) (4)	\$4.2905	\$1.6802	\$2.4740	\$2.6289	-38.73%	56.46%	6.26%	\$0.1549
Demand Cost of Gas (1)	\$1.2888	\$1.4475	\$1.4475	\$1.4443	12.07%	-0.22%	-0.22%	(\$0.0032)
Commodity Margin (2) (3) (5)	\$1.7360	\$1.9325	\$1.9346	\$1.9346	11.44%	0.11%	0.00%	\$0.0000
Total Cost of Gas	\$7.3153	\$5.0602	\$5.8561	\$6.0078	-17.87%	18.73%	2.59%	\$0.1517
Average Annual Usage (Dk)	12,076	12,076	12,076	12,076				
Average Annual Total Cost of Gas	\$88,339.56	\$61,106.98	\$70,718.26	\$72,550.19	-17.87%	18.73%	2.59%	\$1,831.93
Average Annual Total Demand Cost of Gas								(\$38.64)

	Last Rate Case (G008/MR-21-435)	Last Demand Change April 1, 2024 (G008/M-24-146)	October 1, 2024 (G008/AA-24-62)	November 1, 2024 (G008/M-24-146)	Change From Last Rate Case	Change From Last Demand Change	Percent Change (%) From Most Recent PGA	Change (\$) From Most Recent PGA
<b>Large General Service</b>								
Commodity Cost of Gas (WACOG) (4)	\$4.2905	\$3.1141	\$2.4740	\$2.6289	-38.73%	-15.58%	6.26%	\$0.1549
Commodity Margin (2) (3) (5)	\$0.8301	\$1.0029	\$1.0029	\$1.0029	20.82%	0.00%	0.00%	\$0.0000
Commodity Charges	\$5.1206	\$4.1170	\$3.4769	\$3.6318	-29.07%	-11.79%	4.46%	\$0.1549
LV Demand Cost of Gas (1)	\$9.9733	\$12.3733	\$12.8552	\$12.8270	28.61%	3.67%	-0.22%	(\$0.0282)
LV Demand Delivery Charge	\$4.8303	\$6.3303	\$6.3303	\$6.3303	31.05%	0.00%	0.00%	\$0.0000
Average Annual Usage (Dk)	47,751	47,751	47,751	47,751				
Average Daily MDQ Usage (Dk)	7,282	8,448	8,448	8,448				
Average Annual Total Cost of Gas	\$352,314	\$354,599	\$328,105	\$335,263	-4.84%	-5.45%	2.18%	\$7,158.40
Average Annual Total Demand Cost of Gas								(\$238.23)

**Summary of Most Recent PGA**

Customer Class	Commodity Change (\$/Dk)	Commodity Change (Percent)	Demand Change (\$/Dk)	Demand Change (Percent)	Demand Annual Change (\$/Dk)	Total Annual Change (\$/Dk)	Total Annual Change (Percent)
Residential	\$0.1549	6.26%	-\$0.0032	-0.22%	(\$0.28)	\$13.50	2.22%
Commercial/Industrial Firm A	\$0.1549	6.26%	-\$0.0032	-0.22%	(\$0.26)	\$12.29	1.94%
Commercial/Industrial Firm B	\$0.1549	6.26%	-\$0.0032	-0.22%	(\$2.34)	\$110.74	2.37%
Commercial/Industrial Firm C	\$0.1549	6.26%	-\$0.0032	-0.22%	(\$38.64)	\$1,831.93	2.59%
Large General Service	\$0.1549	6.26%	-\$0.0282	-0.22%	(\$238.23)	\$7,158.40	2.18%

- (1) Does not include Demand Smoothing Adjustment.  
(2) Does not reflect Decoupling Factor, GAP, Interim or GCR Factors.  
(3) 2021 Rate Case - tariff values for Last Rate Case and Last Demand Charge. Reflects base rate plus CCRA (As of 11/2023 \$0.0926 per DT).  
(4) Actual WACOG for historical timeframes / 2021 Rate Case Base value in Settlement.

## **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 Response Comments**

**Docket No. G008/M-24-146**

Dated this 15<sup>th</sup> day of **November 2024**

**/s/Sharon Ferguson**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall  Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_24-146_M-24-146
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-146_M-24-146
Seth	DeMerritt	Seth.DeMerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-146_M-24-146
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_24-146_M-24-146
Kathryn	Lloyd	Kathy.lloyd@centerpointenergy.com	CenterPoint Energy	N/A	Electronic Service	No	OFF_SL_24-146_M-24-146
Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.	505 Nicollet Mall 3rd Floor Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-146_M-24-146
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 55101-2131	Electronic Service	Yes	OFF_SL_24-146_M-24-146
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-146_M-24-146
Donald	Wynia	donald.wynia@centerpointenergy.com	CenterPoint Energy	CenterPoint Energy 505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_24-146_M-24-146