



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

November 1, 2021

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

RE: In the Matter of the Petition by CenterPoint Energy for Approval of a Rate Stabilization Plan

Docket No. G-008/M-21-755

Initial Filing

Dear Mr. Seuffert:

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas (“CenterPoint Energy” or the “Company”) respectfully submits this Petition for a Rate Stabilization Plan. The Rate Stabilization Plan is meant to provide rate relief and rate stability for our customers in 2022 and 2023. The Petition offers to resolve all issues in the Rate Case, filed concurrently with this Petition in Docket No. G-008/GR-21-435, and deliver meaningful financial relief to the Company’s customers, lessen the burden on regulatory agencies and other stakeholders, and reaffirm our environmental commitments. In exchange, the Company gains certainty, avoids incurring additional rate case expense and is able to devote resources to other critical efforts, including working with stakeholders to implement the Natural Gas Innovation Act. For all of these reasons, the Company respectfully requests the Commission issue an expedited Notice of Comment and approve the Rate Stabilization Plan effective January 1, 2022.

Sincerely,

/s/ Amber S. Lee

Amber S. Lee
Director Regulatory Affairs

C: Service List

STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph Sullivan	Commissioner
John A. Tuma	Commissioner

In the Matter of the Petition of CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, for Approval of a Capital True-Up Mechanism and Other Rate Adjustments

Docket No. G-008/M-21-755

**PETITION FOR APPROVAL OF
RATE STABILIZATION PLAN**

INTRODUCTION

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas (“CenterPoint Energy Minnesota Gas” or “Company”) hereby petitions the Minnesota Public Utilities Commission (“Commission”) for approval of the proposal described below, which includes a capital-related revenue increase, along with a true-up mechanism and other rate adjustments, aimed at stabilizing customer rates in 2022 and 2023. Today, the Company also filed an application for a general rate increase with the Commission in Docket No. G-008/GR-21-435 (“Rate Case”). However, the Company recognizes the burdens our customers face – due to both the ongoing COVID-19 pandemic and rising gas costs. The Company also understands that rate cases put burdens on the regulatory agencies and others, who already have an enormous workload and other critical work to be done. In short, these are not “business as usual” times. Therefore, pursuant to Minn. Stat. §216B.16 and Minn. Rules 7829.1300 and related Minnesota Rules, CenterPoint Energy Minnesota Gas submits this Petition for Approval of a Rate Stabilization Plan

(“Petition”) that will provide financial relief to our customers when compared to “business as usual” and fully resolve the Rate Case.

In addition, the Company proposes five environmental initiatives that it will undertake in 2022 and 2023 to further our commitment to reduce emissions and assist the state in achieving its climate goals.

I. OVERVIEW

The Company explored various options to mitigate the impact of the Rate Case on our customers, regulators, parties and interested stakeholders – from both a financial and a resource perspective. However, the substantial capital investments CenterPoint Energy Minnesota Gas has made in Minnesota, largely related to our safety and integrity management efforts, require rate relief at this time. Through this Petition, though, the Company offers a Rate Stabilization Plan as an alternative to a fully litigated rate case. This Rate Stabilization Plan, if approved by the Commission by January 1, 2022, would result in a smaller bill impact to our customers when compared to either the Rate Case request or standard interim rates. It would also fully resolve the Rate Case without time and resource consuming litigation, allowing parties to focus on the other critical issues currently before the Commission, such as implementation of the Natural Gas Innovation Act (“NGIA”).

In this Petition, the Company requests the following:

- **Increase in rates for plant investment only:** a base revenue increase of \$39.659 million, effective January 1, 2022, and continuing until January 1, 2024, reflecting the Company’s ongoing capital investments;¹

¹ The Company notes that the bulk of the additional capital investments relates to the Company’s integrity management work, as has been true in the Company’s past several rate cases. These

- **Asymmetrical capital true-up for 2022 and 2023:** an asymmetrical capital-related revenue true-up, whereby the Company would credit customers if its capital-related revenue requirement for 2022 or 2023 does not match or exceed the capital-related revenue requirement base as set forth for 2022 in the Rate Case;
- **Extension of gas cost recovery in Docket No. G-999/M-21-138:** an extension of the ongoing “extraordinary gas cost” recovery from 27 to 63 months, with no provision of interest expense to the Company;
- **Income tax rider:** an income tax rider, as proposed in the testimony of Company witness Mr. Ralph Zarumba and discussed in the testimony of Company witnesses Ms. Nicole Gilcrease and Messrs. Benjamin Vallejo and David Poppie in the Rate Case, to be used only in the event of a change in federal or state income taxes in 2022 or 2023;
- **Continuation of property tax rider but no amortization in 2022 or 2023:** continuation of the current symmetrical property tax tracker, as approved in Docket No. G-008/GR-19-524 and including the regulatory asset balance of \$3.6 million as filed in the Rate Case, but termination of the current amortization of the December 31, 2019 property tax tracker balance of \$7.4 million per year (included in the rates set in the Company’s last rate case, Docket No. G-008/GR-19-524), as of December 31, 2021;
- **Continued deferral of COVID-19 regulatory asset but no amortization in 2022 or 2023:** defer any decision related to the COVID-19 regulatory asset established pursuant to Commission Order in Docket No. E, G-999/M-20-427, with no amortization in 2022 or 2023.

If this Petition is approved as proposed, the Company would implement these terms (other than the extension of the recovery period for extraordinary gas costs) in the Rate Case, fully resolving that proceeding.² The Company proposes to implement the rate increase using the existing revenue apportionment and rate design, as approved in Docket No. G-008/GR-19-524. With approval of this Petition, the Company would further agree not to file its next rate case until on or about November 2, 2023, with a 2024 test

integrity management investments have been widely supported by intervening parties and the Commission in those cases.

² If the Petition is not approved as proposed, the Company reserves the right to withdraw it and proceed with the Rate Case in the ordinary course, with interim rates effective January 1, 2022.

year. The Company discusses the benefits of this Petition, below, and understands the expedited timeframe embodied in this Petition. For that reason, the Company has already engaged in stakeholder discussions and will continue to discuss this Petition with all interested parties.

II. GENERAL FILING INFORMATION

Pursuant to Minn. Rules 7829.1300, subp. 3, the Company provides the following general information.

A. Name, Address and Telephone Number of Utility

CenterPoint Energy Minnesota Gas
505 Nicollet Mall
Minneapolis, MN 55402
(612) 321-4625

B. Name, Address and Telephone Number of Utility Attorney

Brenda Bjorklund
505 Nicollet Mall
Minneapolis, MN 55402
612-321-4976
Brenda.bjorklund@centerpointenergy.com

C. Date of Filing and Proposed Effective Date

The date of the filing is November 1, 2021. The Company respectfully requests approval of this Petition such that the Company can institute new rates in the Rate Case (Docket No. G-008/GR-21-435), effective January 1, 2022.

D. Statute Controlling Schedule for Processing the Filing

Minn. Stat. § 216B.16, subd. 1 requires notice to the Commission 60 days in advance of a proposed rate or tariff change, after which time the proposed rate or tariff change takes effect unless suspended. So that the Commission can consider the merits of this Petition prior to January 1, 2022, when the Company requests to implement new rates, the Company respectfully requests the Commission establish an expedited comment schedule for this filing.

E. Title of Utility Employee Responsible for Filing

Amber S. Lee
Director Regulatory Affairs
CenterPoint Energy Minnesota Gas
Minneapolis, MN 55402
(612) 321-4625
Amber.lee@centerpointenergy.com

F. Summary of Filing

Pursuant to Minn. Rules 7829.1300, Subp. 1 a one-paragraph summary of the filing is attached.

G. Miscellaneous Information

Pursuant to Minn. R. 7829.0700, the Company requests that the following persons be placed on the Commission's official service list for this proceeding:

Amber S. Lee
CenterPoint Energy Minnesota Gas
505 Nicollet Mall
Minneapolis, MN 55402
Amber.lee@centerpointenergy.com

Peggy Sorum
CenterPoint Energy
1111 Louisiana Street
Houston TX 77002
Peggy.sorum@centerpointenergy.com

H. Service List

Pursuant to Minn. R. 7829.1300, subp. 2, the Company has served a copy of this filing on: the Department of Commerce ("Department"); the Office of Attorney General – Residential Utilities Division ("OAG"); all parties on the service list for the Company's Rate Case (Docket No. G-008/GR-21-435); and all persons on the Company's miscellaneous service list, as shown on the attached Certificate of Service.

III. DESCRIPTION AND PURPOSE OF THE RATE STABILIZATION PLAN

1. Substantiating documents and exhibits supporting the Plan.

The Company discusses the specific elements of the Rate Stabilization Plan below and presents the following schedules in support of the Plan:

Schedule 1: Comparison of Financial Impacts and Recoveries under the Rate Case and Stabilization Plan

Schedule 2: Comparison of Average Rate Base under the Rate Case and Stabilization Plan

Schedule 3: Comparison of Operating Income under the Rate Case and Stabilization Plan

Schedule 4: Comparison of Customer Impacts under the Rate Case and Stabilization Plan

Schedule 5: Proposed Customer Rates under the Stabilization Plan

Schedule 6: Proposed Customer Rates for Extending the Extraordinary Gas Cost recovery under the Stabilization Plan

The Company has fully supported a rate increase greater than that requested in this Rate Stabilization Petition in the Rate Case and incorporates the entirety of its Application herein by reference.

IV. SPECIFIC APPROVALS REQUESTED

To provide bill impact relief to our customers and to fully resolve the Rate Case, the Company requests the following approvals by the Commission.

A. Rate Relief and Approval of Asymmetrical Capital True-Up Mechanism

In the Rate Case, the Company requests approval of a base revenue increase of \$67.1 million and an interim rate increase, effective January 1, 2022, of \$51.8 million. As explained in the Rate Case, the primary drivers of this base revenue increase request are the capital investments made since the Company's last rate case and the investments to

be made in 2022. The majority of these investments involve the Company's Transmission Integrity Management Program ("TIMP") and Distribution Integrity Management Program ("DIMP") – the same kind of safety and reliability investments that have been primary drivers of the Company's past several rate cases and have been approved by the Commission with little controversy.

In contrast to the \$67.1 million rate increase, or the \$51.8 million interim rate increase, this Petition requests approval to fully resolve the Rate Case with allowance of increased revenues of \$39.659 million, effective January 1, 2022, with that increase implemented in the Rate Case docket. As such, the Plan represents a reduction in rates, compared to proposed interim or final rates. The financial comparisons between the Rate Case and the Stabilization Plan are included in Schedules 1-3, and a comparison of the customer impacts is included in Schedule 4.

In addition, the Company proposes a one-way capital true-up for 2022 and 2023, similar to those approved in Docket Nos. E-002/M-19-688 and E-002/M-20-743.³ Through this true-up, if the Company does not put in service the investments projected in the Rate Case, customers will receive a credit of the difference in capital-related revenue requirements between that filed for 2022 in the Rate Case and the Company's actual capital-related revenue requirements of either 2022 or 2023. Conversely, if the Company increases its plant in service beyond the level projected in the rate case, those additional costs will not be charged to customers. The Company discusses the mechanics of this true-up in Section VI, below.

³ Though the Company is proposing an asymmetrical true-up for both years 2022 and 2023, the Company is not asking for any additional capital or a step increase for year 2023.

B. Extended Recovery of Extraordinary Gas Costs

To provide further relief to our customers, as part of this Petition, the Company also offers to extend the recovery period for the extraordinary gas costs associated with Winter Storm Uri from 27 months to 63 months.⁴ The Company does not seek recovery of interest on the unrecovered balance during this extended period and understands that these gas costs remain subject to prudence review in Docket No. G-008/M-21-138. The Company offers to implement this extension effective January 1, 2022. As shown on Schedule 4, the Rate Stabilization Plan, including the extension of the extraordinary recovery, would reduce the bill impact to the average residential customer as follows:

Table 1: Comparison of Monthly Residential Customer Impacts

Year	Impact under Rate Case	Impact under Rate Stabilization Plan
2022	\$12.83	\$7.44
2023	\$17.62	\$7.44

C. Approval of Income Tax Rider

As discussed in the Rate Case by Company witnesses Vallejo and Zarumba, there have been serious discussions at both the state and federal level regarding potential changes to corporate income tax rates. Since those income tax rates have not yet changed, and the Company requests in this Petition that new rates be approved effective January 1, 2022, the Company has not incorporated any potential change in corporate tax rates into this Petition. Therefore, the Company requests approval of the Income Tax Rider (“ITR”) proposed by Mr. Zarumba in the Rate Case. As Mr. Zarumba explains, the

⁴ See, Order Granting Variances and Authorizing Modified Cost Recovery Subject to Prudence Review, and Notice and Order for Hearing, Docket No. G-999/M-21-138 (August 30, 2021).

ITR provides for a symmetric adjustment to the Company's rates if the level of income taxes increases or decreases, thereby avoiding rate requests (or rate reduction filings) for a component of the revenue requirement which is outside the control of the Company. The Company requests approval of the ITR as part of this Petition.

D. Property Tax Tracker, No Amortization

The Company requests Commission approval to continue the current symmetrical property tax tracker approved in Docket No. G-008/GR-19-524, including the regulatory asset balance of \$3.6 million as filed in the Rate Case. Continuation of this tracker will ensure that customers pay the Company's actual property taxes, no more and no less. In its next rate case, the Company will provide details on the property tax tracker balance, together with its proposal to either recover or credit to customers the tracker balance. As part of this Petition, the Company also proposes to discontinue recovery of the current amortization of the property tax tracker balance (\$7.4 million per year) as authorized in Docket No. G-008/GR-19-524. See Schedule 3, showing the discontinuation of the property tax amortization for 2022 and 2023.

E. Continuation of COVID-19 Deferral, No Amortization

The Company proposes to continue its current deferral of COVID-19 related costs, as authorized in Docket No. E, G-999/M-20-427. In its next rate case, the Company will provide details on these deferred costs and set forth its proposed regulatory treatment of them. As part of this Petition, the Company will not begin the amortization of the Covid-related deferral at this time. See Schedule 3, showing the removal of the Covid-related amortization proposed in the Rate Case.

V. PROPOSED ENVIRONMENTAL COMMITMENTS

The Company reaffirms its commitment to reducing the environmental footprint of its business and assisting the state in achieving its greenhouse gas emissions reduction goals. Although this Petition will result in significantly lower revenue for the Company than the Company has requested in the Rate Case, the Company is not proposing to shortchange the environment. The Company will undertake the following in 2022 and 2023 in the event that this proposal is accepted.

- **Methane Reduction Plan – Regulator Stations and Odorizers:** The Company proposes to complete a system-wide study of emissions from regulator stations and odorizers and develop a plan to reduce emissions from those sources for implementation beginning in 2024.
- **Solar Installations on Company Facilities:** The Company proposes to use solar energy for Company facilities beginning in 2022.
- **Optimized Leak Repairs:** The Company proposes to reduce the amount of time it takes to repair grade “B” and “C” (nonhazardous leaks), following their detection. The Company will develop a plan to reduce the time required to repair these leaks; we will file a report with the Commission in 2022 and begin implementation of the plan at that time.
- **Increase the Use of Vacuum Purging on Our System:** As the Commission is aware, CenterPoint Energy Minnesota Gas is an early adopter of vacuum purging technology to reduce methane emissions during installation and maintenance work.⁵ This technology transfers natural gas between pipelines without emitting

⁵ See Special Planning Meeting Presentation to the Commission on October 9, 2019, slide 15 regarding “ZEVAC” technology.

methane into the atmosphere, allowing the Company to bypass sections of pipe that are undergoing maintenance or replacement. The Company will increase the use of this technology in our operations and determine benchmarks as to how achieve additional emissions reductions year after year.

- **Electric Vehicles in Our Fleet:** CenterPoint Energy Minnesota gas proposes to increase the number of electric vehicles in our fleet by the end of 2023.⁶

The Company proposes to file annual status reports on these commitments in 2022 and 2023 to ensure transparency as we work to achieve our environmental goals. The commitments described in this section are, of course, only a part of CenterPoint Energy Minnesota Gas's environmental strategy for the next two years. For example, we will continue to work to help our customers reduce their emissions by expanding and improving our Conservation Improvement Program, taking advantage of the Energy Conservation and Optimization Act,⁷ and by filing an Innovation Plan under NGIA in 2022.⁸

VI. PROPOSED IMPLEMENTATION

If this Petition is approved, the Company would implement the extension of time for the recovery of the extraordinary gas costs in Docket No. G-008/M-21-138 and the Company would implement the rate change and the remaining terms of this Petition in the Rate Case. The proposed customer rates by class to effectuate the Stabilization Plan,

⁶ Assuming availability of products in the market.

⁷ H.F. 164 (2021).

⁸ H.F. 6 (2021, 1st Special Session).

including the customer rates for the recovery of the extraordinary gas costs, are shown in Schedules 5 and 6.⁹

Regarding the capital true-up, the Company proposes the following timeline (with corresponding dates in 2024 for the 2023 true-up):

Table 2: Proposed Timeline for Capital True-Up Filing

Date	Commission Activity
March 1, 2023	Company Initial Filing (Company files its 2022 average rate base, supporting materials and calculation of its capital-related revenue requirements for 2022, together with a comparison to the projected 2022 capital-related revenue requirements set forth in the Rate Case and calculation of its proposed reconciliation, if necessary.)
April 1, 2023	Comments on Company Filing
April 15, 2023	Reply Comments
May 15, 2023	Commission Hearing
June 1, 2023	Implementation of Reconciliation, If Necessary

The Company will calculate a one-way capital true-up for 2022 and 2023, similar to those approved in Docket Nos. E-002/M-19-688 and E-002/M-20-743. This calculation will present the capital-related revenue requirement, reflecting plant in service, net of ADIT, and depreciation expense for 2022 and 2023, compared to the capital-related revenue requirement included in the Rate Case. If the federal income tax rate changes during this period, the impact of this change on ADIT will not be included in this

⁹ The Company has effectuated the Stabilization Plan increase using an equal apportionment to each class, which is the methodology used to effectuate interim rate increases.

calculation. Any change in ADIT is to be handled through the Income Tax Rider. Through this true-up, if the Company does not put in service the investments projected in the Rate Case for 2022, customers will receive a credit of the difference in capital-related revenue requirements. Conversely, if the Company increases its plant in service beyond the level projected in the rate case, customers will not be surcharged.

CONCLUSION

This Petition offers a Rate Stabilization Plan meant to provide substantial rate relief and rate stability for our customers in 2022 and 2023. The Petition offers to resolve all issues in the Rate Case, deliver meaningful financial relief to the Company's customers, lessen the burden on regulatory agencies and other stakeholders, and reaffirm our environmental commitments. In exchange, the Company gains certainty and the ability to devote the resources otherwise required to litigate this case to other critical efforts, including working with stakeholders to implement the NGIA. For all of these reasons, the Company respectfully requests approval of this Petition.

Financial Summary
Minnesota Jurisdiction
(\$000s)

Line No.	Description	Schedule Reference	Test Year /1/	Offer
1	Average Net Rate Base	B-1	\$1,752,138	\$1,711,419
2	Operating Income	C-1	\$75,913	\$89,144
3	Allowance for Funds Used During Construction		\$0	\$0
4	Total Return (2 + 3)		\$75,913	\$89,144
5	Overall Rate of Return (4 ÷ 1)		4.33%	5.21%
6	Rate of Return Required	D-1	7.06%	6.86% /2/
7	Required Operating Income (1 x 6)		\$123,701	\$117,403
8	Operating Income Deficiency (7 - 4)		\$47,788	\$28,259
9	Gross Revenue Conversion Factor	F-1	1.4034	1.4034
10	Revenue Deficiency (8 x 9)		\$67,066	\$39,659
			6.54%	3.9%

/1/ Period 12 months ended December 31, 2022, as filed in G-008/GR-21-435

/2/ ROR approved in G-008/GR-19-524

**Summary of Average Rate Base
Minnesota Jurisdiction
(\$000s)**

Line No.	Description	Test Year /1/	Offer
1	Utility Plant in Service	\$3,264,937	\$3,264,937
2	Less Accumulated Depreciation and Amortization	<u>\$1,228,383</u>	<u>\$1,228,383</u>
3	Net Utility Plant in Service	2,036,555	2,036,555
4	Construction Work in Progress	-	
5	Net Acquisition Adjustment	-	
6	Gas Storage Inventory - Non Current	177	177 /2/
7	Customer Advances for Construction	(120)	(120) /2/
8	Accumulated Deferred Income Taxes	(346,171)	(346,171)
9	Working Capital	61,696	20,978 /2/
10	Average Net Rate Base	<u>\$1,752,138</u>	<u>\$1,711,419</u>

/1/ Period 12 months ended December 31, 2022, as filed in G-008/GR-21-435

/2/ Approved in G-008/GR-19-524

Statements of Operating Income
Minnesota Jurisdiction
(\$000s)

Line No.	Description	Test Year /1/		Offer
1	Operating Revenue			
2	Sales of Gas			
3	Residential	\$614,667		\$614,667
4	Commercial & Industrial	319,361		319,361
5	Total Firm	\$934,029	\$0	\$934,029
6	Dual Fuel	62,550		62,550
7	Transportation	28,264		28,264
8	Other	1,299		1,299
9	Less: Franchise Fees	-		-
10	Total	\$1,026,142	\$0	\$1,026,142
11	Late Payment Charges	3,798		3,798
12	Other Operating Revenue	1		1
13	Total Operating Revenue	\$1,029,941	\$0	\$1,029,941
14	Operating Expenses			
15	Operation and Maintenance			
16	Cost of Gas Purchases	\$595,268		\$595,268
17	Production	1,273		1,273
18	Other Gas Supply	954		954
19	Underground Storage	893		893
20	Other Storage	822		822
21	Distribution & Utilization	45,290		45,290
22	Customer Accounts	29,434		29,434
23	Customer Service & Informational	38,603		38,603
24	Sales	380		380
25	Administrative & General	44,967	(600)	44,367
27	Total Operation	\$757,886	(\$600)	\$757,286
28	Maintenance	20,058		20,058
29	Total Operation & Maintenance	\$777,944	(\$600)	\$777,344
30	Depreciation and Amortization	115,417	(4,468) /2/	110,949
31	Federal & State Income Taxes	464	1,980	2,444
32	Deferred Income Taxes	9,953		9,953
33	Investment Tax Credit Adjustment	0		0
34	Other Taxes	50,250	(1,820) /3/	48,430
35	Total Operating Expenses	\$954,028	(\$4,908)	\$949,120
36	Operating Income Before AFUDC	75,913	4,908	80,822
37	Allowance for Funds Used During Construction	-	-	-
38	Total Utility Operating Income	\$75,913	\$4,908	\$80,822
39	Foregone income in the interest of settlement (after tax)			8,322
40	Total Utility Operating Income			<u>\$89,144</u>

/1/ Period 12 months ended December 31, 2022, as filed in G-008/GR-21-435

/2/ delay start of amortization of COVID deferral

/3/ delay start of amortization of 12/31/2021 property tax tracker balance

CenterPoint Energy Minnesota Gas

**Docket No. G008/M-21-755
Schedule 4**

	Rate Case	Stabilization Plan	Rate Case less Stabilization Plan
Rate Increase	\$67.10	\$39.66	\$ 27.44
Interest Impact of extending Gas Cost Recovery	\$0.00	(\$5.98)	\$ 5.98
Net Impact to Company	<u>\$67.10</u>	<u>\$33.68</u>	<u>\$33.42</u>
Distribution Charge/Surcharge	\$ 0.27884	\$ 0.28030	\$ (0.00146)
Monthly Fixed Charge	\$ 11.00	\$ 9.50	\$ 1.50
Residential Monthly Bill Impact (Rate Case Items)	\$4.05	2.83	\$ 1.22
Annual Impact on base rates	\$48.60	\$33.96	\$ 14.64
Residential Monthly Bill Impact (February Market Event Recovery)			
	27 Months	63 Months	
Annual 2022 (Feb. Market Event)	\$ 105.36	\$ 55.30	\$ 50.06
Annual 2023 (Feb. Market Event)	\$ 162.84	\$ 55.30	\$ 107.54
Cumulative Bill Impact (Rate Case + Feb. Market Event)			
Annual 2022	\$153.96	\$89.26	\$ 64.70
Annual 2023	\$211.44	\$89.26	\$ 122.18
Refund to Customers If Company Underspends Capital Plan	No	Yes	
Property Tax Tracker	Yes, with proposed amortization	Yes, but no proposed amortization	
Income Tax Rider	Yes	Yes	
Covid-Related Deferral	Proposed Amortization	No Proposed Amortization	

Proposed Rates and Monthly Customer Impacts

	Distribution			Demand			Monthly Customer Impact
	Current Rates	Settlement Increase	Proposed Rate	Current Rates	Settlement Increase	Proposed Rate	
Residential	\$ 0.24452	\$ 0.03578	\$ 0.28030				\$ 2.83
Com Firm A	\$ 0.25820	\$ 0.04916	\$ 0.30736				\$ 3.15
Com/Ind Firm B	\$ 0.19789	\$ 0.02776	\$ 0.22565				\$ 6.45
Com/Ind Firm C - sales	\$ 0.16769	\$ 0.01998	\$ 0.18767				\$ 27.72
Com/Ind Firm C - trans	\$ 0.16769	\$ 0.01998	\$ 0.18767				\$ 30.81
Lg General Firm Sales	\$ 0.07710	\$ 0.00799	\$ 0.08509	\$ 0.48303	\$ 0.05436	\$ 0.53739	\$ 619.56
Lg Firm Transport	\$ 0.07710	\$ 0.00799	\$ 0.08509	\$ 0.48303	\$ 0.05436	\$ 0.53739	\$ 729.33
Lg Firm Transport - MR		\$ -	\$ -				\$ -
Sm Dual Fuel A sales	\$ 0.13764	\$ 0.01404	\$ 0.15168				\$ 52.59
Sm Dual Fuel A trans	\$ 0.13764	\$ 0.01404	\$ 0.15168				\$ 52.59
Sm Dual Fuel B sales	\$ 0.12708	\$ 0.01162	\$ 0.13870				\$ 174.36
Sm Dual Fuel B trans	\$ 0.12708	\$ 0.01162	\$ 0.13870				\$ 174.36
Lg Dual Fuel sales	\$ 0.07710	\$ 0.00790	\$ 0.08500				\$ 281.15
Lg Dual Fuel sales - MR		\$ -	\$ -				\$ -
Lg Dual Fuel trans	\$ 0.07710	\$ 0.00790	\$ 0.08500				\$ 749.89
Lg Dual Fuel trans - MR		\$ -	\$ -				\$ -

Settlement Allocation Calculation

Customer Class	2020 Rate Case Bills	2020 Rate Case DTH	2020 Rate Case Demand Delivery	custo chg \$	delivery chg \$	demand delivery & MR Adj/Min Vol	CCRC \$	GAP \$	demand	commodity	total annual revenue	final billing rate revenue increase	revenue increase due to CCRC	increase in customer charge	increase in demand delivery	non-tracker, non-custo chg increase	% of total
A	B	C	D	E	F	G	H	I	J	K	L = E+F+G+H+I+J+K	M	N	O	P	Q=M+P-(N+O)	R
Residential	9,710,407	76,812,546		\$92,248,867	\$143,439,748		\$18,143,123	\$0	\$96,430,470	\$163,572,317	\$513,834,525	\$26,239,166	\$76,813	\$0		\$26,162,353	72.66%
Com Firm A	343,110	2,199,679		\$5,146,650	\$4,145,515		\$519,564	\$0	\$2,761,477	\$4,684,216	\$17,257,423	\$1,014,492	\$2,200	\$0		\$1,012,292	2.81%
Com/Ind Firm B	241,251	5,609,063		\$5,066,271	\$8,259,906		\$1,324,861	\$0	\$7,041,618	\$11,944,500	\$33,637,155	\$1,515,008	\$5,609	\$0		\$1,509,399	4.19%
Com/Ind Firm C - sales	244,076	33,875,629		\$11,593,610	\$44,011,217		\$8,001,424	\$0	\$42,527,465	\$72,138,152	\$178,271,867	\$6,623,972	\$33,876	\$1,830,570		\$4,759,526	13.22%
Com/Ind Firm C - trans	4,704	725,567		\$693,840	\$942,657		\$171,379	\$0	\$0	\$0	\$1,807,876	\$137,948	\$726	\$35,280		\$101,942	0.28%
		<u>34,601,196</u>															
Lg General Firm Sales	276	1,485,090	8,033	\$248,400	\$695,913	\$414,406	\$350,778	\$0	\$837,199	\$3,162,499	\$5,709,196	\$190,925	\$1,485	\$41,400	\$51,212	\$199,252	0.55%
Lg Firm Transport	324	2,026,557	11,415	\$324,000	\$949,645	\$588,877	\$478,673	\$0	\$0	\$0	\$2,341,195	\$255,531	\$2,027	\$48,600	\$72,773	\$277,677	0.77%
		<u>3,511,647</u>	<u>19,448</u>	<u>\$572,400</u>	<u>\$1,645,558</u>	<u>\$1,003,283</u>											
Lg Firm Transport - MR	132	30,628,984		\$132,000	\$11,200,699		\$341,644	\$0	\$0	\$0	\$11,674,343	\$21,246	\$1,446	\$19,800		(\$0)	0.00%
Sm Dual Fuel A sales	10,824	4,055,160		\$600,732	\$4,079,085		\$957,829	\$0	\$0	\$8,635,463	\$14,273,109	\$593,316	\$4,055	\$48,708		\$540,553	1.50%
Sm Dual Fuel A trans	1,140	427,097		\$177,270	\$429,617		\$100,880	\$0	\$0	\$0	\$707,767	\$62,489	\$427	\$5,130		\$56,932	0.16%
		<u>4,482,257</u>															
Sm Dual Fuel B sales	1,896	2,845,309		\$167,796	\$2,599,190		\$672,062	\$0	\$0	\$6,059,086	\$9,498,133	\$356,891	\$2,845	\$12,324		\$341,722	0.95%
Sm Dual Fuel B trans	156	234,106		\$29,406	\$213,856		\$55,296	\$0	\$0	\$0	\$298,558	\$29,364	\$234	\$1,014		\$28,116	0.08%
		<u>3,079,415</u>															
Lg Dual Fuel sales	1,752	6,232,616		\$1,576,800	\$2,920,604		\$1,472,144	\$0	\$0	\$13,272,356	\$19,241,904	\$675,399	\$6,233	\$262,800		\$406,366	1.13%
Lg Dual Fuel sales - MR	108	763,195		\$97,200	\$413,347		\$180,267	\$0	\$0	\$1,625,224	\$2,316,037	\$16,963	\$763	\$16,200		(\$0)	0.00%
Lg Dual Fuel trans	984	9,336,563		\$984,000	\$4,395,629		\$1,768,362	\$0	\$0	\$0	\$7,147,992	\$763,831	\$7,487	\$147,600		\$608,744	1.69%
Lg Dual Fuel trans - MR	132	13,326,088		\$132,000	\$2,110,446		\$781,911	\$0	\$0	\$0	\$3,024,357	\$23,110	\$3,310	\$19,800		(\$0)	0.00%
		<u>15,569,179</u>															
Total	<u>10,561,272</u>	<u>190,583,249</u>		<u>\$119,791,242</u>	<u>\$232,452,633</u>		<u>\$35,320,196</u>	<u>\$0</u>	<u>\$149,598,229</u>	<u>\$285,093,812</u>	<u>\$821,041,436</u>	<u>\$38,519,651</u>	<u>\$149,535</u>	<u>\$2,489,226</u>	<u>\$123,985</u>	<u>\$36,004,875</u>	<u>100.00%</u>

Settlement Allocation Calculation

Customer Class	Margin Revenue less CCRC	Percentage of Revenue	Allocation of Settlement	Allocation to Demand	\$'s to Demand	Increase to Demand	\$'s to Distribution	Increase per DTH	Percentage Increase	Monthly Impact
S	T	U	V	W=(G+P)/(E+F+G+Q)	X=V*U	Y=(X-D)/12	Z=V-X	AA	AB	AC
Residential	\$261,927,781	69.3%	\$27,483,899				\$27,483,899	\$ 0.3578	10.5%	\$ 2.83
Com Firm A	\$10,306,657	2.7%	\$1,081,470				\$1,081,470	\$ 0.4916	10.5%	\$ 3.15
Com/Ind Firm B	\$14,841,185	3.9%	\$1,557,275				\$1,557,275	\$ 0.2776	10.5%	\$ 6.45
Com/Ind Firm C - sales	\$64,059,369	16.9%	\$6,766,666				\$6,766,666	\$ 0.1998	10.6%	\$ 27.72
Com/Ind Firm C - trans	\$1,809,725	0.5%	\$144,932				\$144,932	\$ 0.1998	8.0%	\$ 30.81
	\$65,869,094	17.4%	\$6,911,598				\$6,911,598	\$ 0.1998	10.5%	
Lg General Firm Sales	\$1,642,256	0.4%	\$171,000		\$52,399	\$0.5436	\$118,601	\$ 0.0799	10.4%	\$ 619.56
Lg Firm Transport	\$2,239,426	0.6%	\$236,302		\$74,459	\$0.5436	\$161,843	\$ 0.0799	10.6%	\$ 729.33
	\$3,881,682	1.0%	\$407,302	31%	\$126,858	\$0.5436	\$280,444	\$ 0.0799	10.5%	
Lg Firm Transport - MR		0.0%	\$0				\$0	\$ -	#DIV/0!	\$ -
Sm Dual Fuel A sales	\$5,321,841	1.4%	\$569,239					\$ 0.1404	10.7%	\$ 52.59
Sm Dual Fuel A trans	\$674,506	0.2%	\$59,953					\$ 0.1404	8.9%	\$ 52.59
	\$5,996,347	1.6%	\$629,193				\$629,193	\$ 0.1404	10.5%	
Sm Dual Fuel B sales	\$3,136,201	0.8%	\$330,592					\$ 0.1162	10.5%	\$ 174.36
Sm Dual Fuel B trans	\$273,640	0.1%	\$27,200					\$ 0.1162	9.9%	\$ 174.36
	\$3,409,841	0.9%	\$357,792				\$357,792	\$ 0.1162	10.5%	
Lg Dual Fuel sales	\$5,435,603	1.4%	\$492,579				\$492,579	\$ 0.0790	9.1%	\$ 281.15
Lg Dual Fuel sales - MR		0.0%					\$ -	\$ -	#DIV/0!	\$ -
Lg Dual Fuel trans	\$6,291,060	1.7%	\$737,892				\$737,892	\$ 0.0790	11.7%	\$ 749.89
Lg Dual Fuel trans - MR		0.0%					\$ -	\$ -	#DIV/0!	\$ -
	\$11,726,663	3.1%	\$1,230,471				\$1,230,471	\$ 0.0790	10.5%	
Total	\$377,959,250	100%	\$ 39,659,000		\$ 126,858		\$ 39,532,142			

**Extraordinary Gas Cost Surcharge Rates Proposed for January 2022 -
November 2026**

Per Therm Rate Summer (May - Oct.)	\$ 0.11526
Per Therm Rate Winter (Nov. - April)	\$ 0.04610

CERTIFICATE OF SERVICE

Erica Larson served the above Filing of CenterPoint Energy to all persons at the addresses indicated on the attached list by having the document delivered by electronic filing.

/s/ _____
Erica Larson
Counsel
CenterPoint Energy

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Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_21-435_GR-21-435
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