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– VIA ELECTRONIC FILING –

July 11, 2019

Mr. Daniel Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

RE: CenterPoint Energy’s 2018 Conservation Improvement Program Status Report & Associated Compliance Filings

Reply Comments

Docket No. G-008/M-19-298

Dear Mr. Wolf:

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, (“CenterPoint Energy” or the “Company”) respectfully submits the following *Reply Comments* in response to the *Comments*¹ of the Minnesota Department of Commerce, Division of Energy Resources (“DER Staff”) regarding the Company’s *2018 Demand-Side Management (“DSM”) Financial Incentive Report, Conservation Improvement Program (“CIP”) Tracker Report, and Conservation Cost Recovery Adjustment (“CCRA”) Proposal* (“the *Petition*”).² The Company appreciates the time and effort expended by DER Staff in the analysis and review of the *Petition*.

CenterPoint Energy has reviewed the *Comments* and accepts without contention the following recommendations that the Minnesota Public Utilities Commission (“Commission”):

- 1) Approve CenterPoint Energy’s proposed 2018 DSM financial incentive of \$11,317,175 to be included in the Company’s CIP Tracker account no sooner than the issue date of the Commission’s *Order* in Docket No. G-008/M-19-298;
- 2) Approve CenterPoint Energy’s 2087 CIP Tracker account, as summarized in the *Comments*, Table 1, resulting in a December 31, 2018 balance of **(\$6,096,809)**;

¹ See Comments of the Minnesota Department of Commerce, Division of Energy Resources *In the Matter of Natural Gas Conservation Improvement Program 2018 Status Report & Associated Compliance Filings*, Docket No. G-008/M-19-298 (June 28, 2019).

² See *CenterPoint Energy’s Natural Gas Conservation Improvement Program 2018 Status Report & Associated Compliance Filings*, Docket No. G-008/M-19-298, *et al.*, (May 1, 2019).

On May 1, 2019 CenterPoint Energy requested approval to increase its CCRA to \$0.0576 per dekatherm (“Dth”) or 0.00576 per therm.³ The requested CCRA of \$0.00576 per therm was calculated based on the rate designed to reduce the CIP Tracker balance as close to zero as possible by the end of 2020.⁴ The Company and DER Staff have discussed the CCRA request and the Company believes there is agreement that the Company requested a CCRA of 0.00576 per therm and not 0.00567 per therm as described in the DER Staff recommendations.⁵

CenterPoint Energy requests, in alignment with the Company’s original request, that the Commission:

- 3) Approve a 2019/2020 CCRA of \$0.00576 per therm, effective September 1, 2019; and
- 4) Approve the Company’s proposed bill message concerning its CCRA that states:
“The PUC has approved a Conservation Cost Recovery Adjustment (CCRA) factor of \$0.00576 per therm. This charge will be used to fund energy conservation activities and has been added to your delivery charge. For more information, please call or visit our website.”

CenterPoint Energy appreciates DER Staff’s review of its *Petition* as well as the historical context DER Staff provided in the table attached to its *Comments*. The Company would like to add to this historical context by highlighting that Minnesota is a national leader in providing effective, and cost-effective, natural gas efficiency programs that delivers significant benefits to customers.⁶

Please feel free to contact me at 612-321-4324 or ethan.warner@centerpointenergy.com with any questions.

Sincerely,

/s/ Ethan S. Warner

Ethan S. Warner
Regulatory Analyst, Conservation Improvement Program

C: Service List

³ See *id* at p. 51.

⁴ See *id* at appendix attachment B-1 and B-2.

⁵ See Comments of the Minnesota Department of Commerce, Division of Energy Resources *In the Matter of Natural Gas Conservation Improvement Program 2018 Status Report & Associated Compliance Filings*, Docket No. G-008/M-19-298 (June 28, 2019).

⁶ See CenterPoint Energy’s Reply Comments *In the Matter of Natural Gas Conservation Improvement Program 2018 Status Report & Associated Compliance Filing*, Docket No. G-008/M-18-120 (June 11, 2018).

AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

Ethan S. Warner, being first duly sworn on oath, deposes and says he served the attached Reply Comments by CenterPoint Energy to all persons at the addresses indicated on the attached list by having the document delivered by electronic filing or by placing in the U.S. Mail at the City of Minneapolis, Minnesota.

/s/ _____
Ethan S. Warner
Regulatory Analyst
CenterPoint Energy

Subscribed and sworn to before me
this 11th day of July 2019

/s/ Melodee S. Carlson Chang
Melodee S. Carlson Chang, Notary Public
My Commission Expires on January 31, 2024

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Lauryn	Schothorst	lschothorst@mnchamber.com		400 Robert St N Ste 1500 Saint Paul, MN 55101	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Anna	Sommer	anna@sommerenergy.com	Sommer Energy LLC	PO Box 766 Grand Canyon, AZ 86023	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Russ	Stark	Russ.Stark@ci.stpaul.mn.us	City of St. Paul	390 City Hall 15 West Kellogg Boulevard Saint Paul, MN 55102	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Kodi	Verhalen	kverhalen@briggs.com	Briggs & Morgan	2200 IDS Center 80 South Eighth Street Minneapolis, Minnesota 55402	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop	211 S. Harth Ave Madison, SD 57042	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Sharon N.	Walsh	swalsh@shakopeeutilities.com	Shakopee Public Utilities	255 Sarazin St Shakopee, MN 55379	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, Minnesota 55402	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST

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Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST