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P.O. Box 59038
Minneapolis, MN 55459-0038

January 8, 2020

Mr. Ryan Barlow
Acting Executive Secretary, General Counsel
Minnesota Public Utilities Commission
121 East 7th Place, Suite 350
St. Paul, MN 55101-2147

VIA E-FILING

**RE: CenterPoint Energy 's Request for Change in Demand Units
Docket No. G008/M-19-278 – REPLY COMMENTS**

Dear Mr. Barlow:

On May 1, 2019, CenterPoint Energy (the “Company”) petitioned for approval of changes in demand units effective May 1 and November 1, 2019. The Company made a supplemental filing on November 1, 2019 that updated costs for contracts that had yet to be finalized on the initial filing date.

On December 24, 2019, the Department of Commerce, Division of Energy Resources (the “Department”) filed Comments regarding the Company’s petition. The Department recommends that the Minnesota Public Utilities Commission accept CenterPoint Energy’s proposed level of demand entitlement and allow CenterPoint to recover associate demand costs through the monthly Purchased Gas Adjustment (PGA) effective May 1, 2019 and November 1, 2019.

In regard to demand entitlement, CenterPoint Energy included in its January 2020 PGA filing (filed on December 30, 2019: Docket No. G-008/AA-19-831) an increase in pipeline transportation and related service rates due to Northern Natural Gas and Viking Pipeline rate cases. The rates filed reflect what each respective pipeline company will begin charging on January 1, 2020, subject to refund in FERC proceedings.

The Company appreciates the analysis and Comments provided by the Department and supports the recommendation outlined in the Department’s analysis.

If you have any questions or require additional information, please contact me at 612.321.5078 or Marie.Doyle@CenterPointEnergy.com.

Sincerely,

/s/

Marie M. Doyle
Regulatory Analyst

cc: Service List