



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

August 1, 2025

Mr. Mike Bull
Deputy Executive Secretary
Minnesota Public Utilities Commission
350 Metro Square Building
121 East Seventh Place, Suite 350
St. Paul, MN 55101-2147

Re: In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery Process for Cost Impacts Due to February Extreme Market Conditions Annual Compliance Filing Docket No. G-008/M-21-138 and Docket No. G-999/M-21-135

Dear Mr. Bull:

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or the "Company"), respectfully submits this filing in compliance with Order Point 15 of the Commission's February 17, 2023, in Docket No. G-008/M-21-138 Order (hereafter "Order"), summarized below.

2. No later than its next rate case, each gas utility in this docket shall update its existing interruptible tariffs to ensure customers understand the possibility of economic interruptions and propose new or alternative interruptible tariffs that include additional economic curtailment provisions that could protect the system from future price spikes.
3. If a gas utility in this docket pays prices on the daily spot market that exceed five times the average price of gas in the utility's filed purchased-gas adjustment for the current month when the gas was purchased, the utility shall make a filing to the Commission within 14 days identifying: A. Its costs for procuring gas for Minnesota customers while gas prices were inflated above this amount, B. What actions the utility took to account for or mitigate those costs, and C. Justifications for why its actions were prudent.
4. The gas utilities in this docket shall participate in the North American Energy Standards Board Gas/Electric Harmonization Forum and other relevant efforts to track and pursue beneficial reforms, such as improving the force majeure language in the NAESB standard contract.
5. The gas utilities in this docket shall continue exploring the availability and cost of contracting, hedging, and supply options that would provide better protection against price spikes.
6. The gas utilities in this docket shall consider variations to, and explain their plans to, incorporate a greater degree of baseload purchases.
7. The gas utilities in this docket shall explore modifications to storage inventory management that could preserve withdrawal capabilities for later in the winter.
8. The gas utilities in this docket shall commit to improving their supply reserve margin practices to minimize these quantities to the greatest extent reasonable and be prepared to explain the level of their supply reserve margins in the future.
9. In future contract demand entitlement filings, the gas utilities in this docket shall discuss how changes to their pipeline capacity affect their supply diversity and, 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.

10. Each gas utility in this docket shall include in its relevant annual, forward-looking gas planning or hedging filings: A. Its expected supply mixes across different load and weather conditions throughout each month of the upcoming winter season; B. The forecasted minimum, average, and maximum day load requirements; and C. The expected mix of baseload, storage, and spot supply on those days.

11. The gas utilities in this docket shall design plans that study customer responses to conservation calls.

12. CenterPoint shall use the circumstances of the event, the prevailing winter, and the status of its fuel inventory to inform its peak-shaving dispatch decisions.

14. Xcel and CenterPoint shall file dynamic proposals for calling on peaking resources that recognize that these decisions depend on the economic and situational context of the utility and the market.

15. By August 1 of each year, each gas utility in this docket must make an annual compliance filing that details its recent efforts and addresses parties' recommendations made in this proceeding.

Additionally, in the Order issued on June 2, 2025, the Commission ordered:

16. The Gas Utilities must include in future August compliance filings a report on how they are improving incorporation of curtailment calls into their gas supply planning processes for both reliability and economic purposes.

17. The Gas Utilities must report, in future August compliance filings, on how they are improving interruptible customer compliance with curtailment orders.

18. The utility shall notify the Commission of a pricing event within 3 days of the first day gas prices spike to five times the PGA cost. The notification shall be filed in e-dockets and include the date of the initial price spike and the impacted hubs. In addition, if a gas utility in this docket pays prices on the daily spot market that exceed five times the average price of gas in the utility's filed purchased-gas adjustment for the current month when the gas was purchased, the utility shall make a filing to the Commission within 14 days following the last day of the price event identifying: A. Its costs for procuring gas for Minnesota customers while gas prices were inflated above this amount, B. What actions the utility took to account for or mitigate those costs, and C. Justifications for why its actions were prudent.

Please contact me at Donald.Wynia@centerpointenergy.com or 612-321-4677 if you have any questions regarding this filing.

Sincerely,

/s/

Donald Wynia
Regulatory Analyst
C: Service List

**ADDITIONAL
INFORMATION**

**Minn. Rule 7829.1300, Subp. 3
CenterPoint Energy**

A. Name, Address, and Telephone Number of Utility

CenterPoint Energy Resources Corp., d/b/a/ CenterPoint Energy Minnesota Gas
505 Nicollet Mall
P.O. Box 59038
Minneapolis, MN 55459-0038
(612) 372-4664

B. Name Address, and Telephone Number of Utility Attorney

Jason Loos
CenterPoint Energy
505 Nicollet Mall
P.O. Box 59038
Minneapolis, MN 55459-0038
(612) 321-4410
Jason.Loos@CenterPointEnergy.com

C. Date of Filing and the Date the Proposed Rate or Service Change Will Take Effect

Date Filed: August 1, 2025
Effective Date: August 1, 2025

D. Statute Controlling Schedule for Processing the Filing

CenterPoint Energy is unaware of any statute that controls the time frame for processing this filing.

E. Utility Employee Responsible for Filing

/s/ _____
Donald Wynia
Regulatory Analyst
(612) 321-4677
Donald.Wynia@CenterPointEnergy.com

F. Description of the Filing, Its Impact on Rates and Services, Its Impact on Any Affected Person, and the Reasons for the Filing

CenterPoint Energy submits a detailed response to Items 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 16, 17, and 18 as discussed in the Orders.

G. Miscellaneous Information

CenterPoint Energy requests that the following employees be included in the service list for this proceeding.

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Background Information

CenterPoint Energy implemented the February 2021 Weather Event Gas Cost Recovery Rider surcharge effective September 1, 2021, in accordance with Order Point 7 (Docket No. G-008/M-21-138) of the Order. The Company files a quarterly compliance filing for the extraordinary cost balance recovered through the February 2021 Weather Event Gas Cost Recovery Rider surcharge.

On December 30, 2021, the Commission issued an Order Denying Rate Stabilization Plan but Extending Amortization Period in Docket No. G-008/M-21-755, approving CenterPoint Energy's extension of the amortization period for February 2021 Weather Event Gas Cost Recovery from 27 months to 63 months beginning on January 1, 2022, for all customer classes. The Company issued a Compliance Filing reflecting the revised rates on December 15, 2021.

On February 17, 2023, the Commission issued an Order (Docket No. G-008/M-21-138) that stated by August 1 of each year, each gas utility in this docket must make an annual compliance filing. The following information addresses the ordering points that are relevant to the Company.

On June 2, 2025, the Commission issued an Order (Docket No. G-008/M-21-138) that included three additional requirements:

- 16. The Gas Utilities must include in future August compliance filings a report on how they are improving incorporation of curtailment calls into their gas supply planning processes for both reliability and economic purposes.
- 17. The Gas Utilities must report, in future August compliance filings, on how they are improving interruptible customer compliance with curtailment orders.
- 18. The utility shall notify the Commission of a pricing event within 3 days of the first day gas prices spike to five times the PGA cost. The notification shall be filed in e-dockets and include the date of the initial price spike and the impacted hubs. In addition, if a gas utility in this docket pays prices on the daily spot market that exceed five times the average price of gas in the utility's filed purchased-gas adjustment for the current month when the gas was purchased, the utility shall make a filing to the Commission within 14 days following the last day of the price event identifying: A. Its costs for procuring gas for Minnesota customers while gas prices were inflated above this amount, B. What actions the utility took to account for or mitigate those costs, and C. Justifications for why its actions were prudent.

February 17, 2023, and June 2, 2025, Order Discussion Points

2. No later than its next rate case, each gas utility in this docket shall update its existing interruptible tariffs to ensure customers understand the possibility of economic interruptions and propose new or alternative interruptible tariffs that include additional economic curtailment provisions that could protect the system from future price spikes.

The Company filed in its 2023 rate case the requested, the information can be found in Docket No. G-008/GR-23-173. An order was received on June 27, 2025. The expected effective date of these tariffs is September 1, 2025.

3. If a gas utility in this docket pays prices on the daily spot market that exceed five times the average price of gas in the utility's filed purchased-gas adjustment for the current month when the gas was purchased, the utility shall make a filing to the Commission within 14 days identifying: A. Its costs for procuring gas for Minnesota customers while gas prices were inflated above this amount, B. What actions the utility took to account for or mitigate those costs, and C. Justifications for why its actions were prudent.

During the winter season of 2024-2025, prices did not meet the notification filing requirements. During the Martin Luther King Jr. Day weekend, January 20, 2025, prices increased above average cold weather pricing, however the increase did not meet the criteria set forth in this order. During this time, the Company remained in contact with the Department of Commerce to inform them of the pricing and how the system was managing the colder weather.

4. The gas utilities in this docket shall participate in the North American Energy Standards Board Gas/Electric Harmonization Forum and other relevant efforts to track and pursue beneficial reforms, such as improving the force majeure language in the NAESB standard contract.

There are no new developments, although the Company remains committed to working with NAESB to improve contract language.

5. The gas utilities in this docket shall continue exploring the availability and cost of contracting, hedging, and supply options that would provide better protection against price spikes.

CenterPoint Energy uses a diversified gas supply portfolio consisting of a combination of baseload supplies, call options, daily spot market purchases, storage, and peaking supplies which are designed to maintain reliability, while balancing price protection, stability of gas supply costs, and reasonable prices.

Post Storm Uri and as the CenterPoint Energy continues to endure natural events, the Company continues to evaluate plan modifications/enhancements to its supply plan and procurement strategies in efforts to further protect its customers from extraordinary costs due to price volatility or future market price spikes:

- Increased baseload first-of-the-month index purchases which reduced the percentage of planned supply to be met through daily/swing gas purchases;
- Ensured the Company's supply mix strategy at its primary receipt points is to be met by a blend of first-of-the-month index purchases as well as daily index purchases to better achieve price diversification.
- Acted on securing long-term hedges of 24-months beginning April 1, 2023, and will continue to evaluate these opportunities going forward;
- Received approval from the Minnesota Public Utilities Commission ("MPUC") to modify the structure of the hedging order to allow for more flexibility and to accommodate future customer growth in Docket G008/M-23-360.
- Adjusted Winter Season 24-25 hedging strategy to be based on a maximum hedged volume of 25% of anticipated customer load requirements;
- Continue to evaluate and explore storage opportunities whose acquisitions would further stabilize the Company's supply portfolio (i.e., East Cheyenne and ANR Pipeline Company ("ANR")).

6. The gas utilities in this docket shall consider variations to, and explain their plans to, incorporate a greater degree of baseload purchases.

As mentioned in response to question five, CenterPoint Energy continues to incorporate in its supply procurement increasing baseload first-of-the-month index purchases which reduce the percentage of planned supply to be met through daily/swing gas purchases. The below chart illustrates the planned increase in baseload first-of-the-month index purchases compared to planned total system purchases over the last four years:

Winter Plan Year	Baseload - Index Price (Dth)	Total System Purchases (Dth)	% of Total System Purchases
2020-2021	21,050,000	104,336,576	20%
2021-2022	28,100,000	107,636,370	26%
2022-2023	26,669,930	103,458,231	26%
2023-2024	27,145,000	102,444,522	26%
2024-2025	29,969,950	102,390,966	29%

7. The gas utilities in this docket shall explore modifications to storage inventory management that could preserve withdrawal capabilities for later in the winter.

The Company requested a change on April 1, 2024, in Docket No. G008/M-24-146, demand rates. CenterPoint Energy requested approval of demand charges associated with the storage partnership transaction between Tenaska and East Cheyenne for firm storage services effective April 1, 2024, to March 31, 2029. East Cheyenne held an open season for 2.5 Bcf maximum storage capacity per year with max withdrawal deliverability of 30,000 Dth/day. The MPUC issued an Order approving these changes on June 23, 2025.

Additional East Cheyenne Gas Storage of 3.2 Bcf became available beginning April 1, 2025, and CenterPoint Energy elected to partner again with Tenaska for a term through March 31, 2028, in the Open Season with hopes of adding additional storage to its supply portfolio. Attempts were successful for the full 3.2 Bcf which increases the total East Cheyenne Gas Storage capacity the Company and Tenaska holds to 5.7 Bcf. This adds storage withdrawal deliverability of 38,400 Dth/day at its highest ratchet based on level of storage inventory, increasing total withdrawal deliverability of East Cheyenne Gas Storage to 68,400 Dth/day. The Company requested approval on April 1, 2025, in Docket No. G008/M-25-72 of demand charges associated with the storage. East Cheyenne connects to Trailblazer which then feeds into NNG. Since the Company's transportation capacity on Trailblazer is Winter Only and there is no transportation capacity currently available on Trailblazer, CenterPoint Energy would not be able to bid on this capacity solely. Tenaska brought this opportunity to CenterPoint Energy in the form of a partnership where Tenaska would hold the storage capacity with the Company's backing with the obligation to deliver the volume to CenterPoint Energy in the Winter at a mutually agreeable NNG receipt point.

The Company participated in the Ventura Xpress Project Open Season ("Project") posted by ANR Pipeline Company ("ANR") in September 2023 for 4.5 Bcf of firm storage services and the corresponding firm transportation services at ANR maximum tariff rates. The Project will deliver

approximately 75,000 Dth/day of firm storage service from ANR storage to the Ventura interconnect on Northern Border Pipeline Company (“NBPL”) via an agreement that ANR will enter into with NBPL. The Ventura interconnect is a bi-directional feed into NNG which is where the Company holds the majority of its receipt point capacity on NNG. CenterPoint Energy was awarded the full capacity out 15 years from in-service date with the earliest in-service date being April 1, 2025. The Company requested approval on April 1, 2025, in Docket No. G008/M-25-72 of demand charges associated with the storage.

CenterPoint Energy plans to maximize the use of contract storage assets by cycling all of the available pipeline storage gas during the months of October through April. A minimum level of gas inventory (withdraw deliverability) is always carried into April to meet daily balancing needs during the coldest days, and a minimum level of storage capacity (injection capability) is left available for the warmest days of November to manage potential long imbalance positions from firm gas purchases. CenterPoint Energy intends on practicing best efforts to hold onto its highest level of storage withdraw capability through the end of January to mid-February. January has been the month when the Company historically has experienced its peak day. Below illustrates the Company’s highest level of storage withdrawal deliverability:

Pipeline/Source	Storage Capacity (Bcf)	Max Withdrawal Deliverability (Dth)
Northern Natural Gas Company	3,291,777	57,094
ANR Pipeline Company	4,583,640	75,000
Natural Gas Pipeline Company	15,823,950	210,986
Medford Underground Storage (Company Owned)	2,100,000	55,000
BP Canada Marketer Storage (NNG)	10,000,000	120,000
Tenaska Marketer Storage (East Cheyenne)	5,700,000	68,400
Total Volume	41,499,367	586,480

8. The gas utilities in this docket shall commit to improving their supply reserve margin practices to minimize these quantities to the greatest extent reasonable and be prepared to explain the level of their supply reserve margins in the future.

CenterPoint Energy determines its planned gas supply based on the interplay of a multitude of factors and application of experience, expertise, and judgment. The factors that CenterPoint Energy considers in determining the extent to which it will acquire gas supplies in excess of its forecasted load include monthly pipeline imbalance levels, storage inventory levels, pipeline constraints and the availability of System Management Service (“SMS”) balancing, potential supply cuts, and weather forecast uncertainty. Each of these factors change constantly, so while CenterPoint Energy is intentional and deliberate in determining its planned gas supply relative to its load forecast, the dynamic nature of these different factors does not lend itself to setting an exact supply reserve target for each day of the year.

CenterPoint Energy matches its gas supplies as closely as possible to forecasted load so that the Company does not procure excess gas that is not needed. On most days, the Company can closely match its gas supplies to customer load. That said, on high demand days, CenterPoint Energy aims to be slightly “long” in its gas supplies, meaning that the Company aims to procure slightly more gas than it expects is needed to ensure reliable service, make best efforts to avoid

punitive imbalance penalties, cover any potential supply cuts, and ability to adjust to forecast uncertainty.

9. In future contract demand entitlement filings, the gas utilities in this docket shall discuss how changes to their pipeline capacity affect their supply diversity and, 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.

This information has been discussed in the Company's most recent Demand Entitlement filing submitted on April 1, 2025, in Docket No. G-008/M-25-72.

10. Each gas utility in this docket shall include in its relevant annual, forward-looking gas planning or hedging filings: A. Its expected supply mixes across different load and weather conditions throughout each month of the upcoming winter season; B. The forecasted minimum, average, and maximum day load requirements; and C. The expected mix of baseload, storage, and spot supply on those days.

CenterPoint Energy addresses its actual and forward-looking gas planning in the annual Gas Procurement Plan which was filed on July 28, 2025. The 2025 filing was filed under the hedging variance docket number G008/M-23-360. This document can be referenced for supply purchase planning; including but not limited to, hedging plan, supply mix strategy, and expected load requirements.

11. The gas utilities in this docket shall design plans that study customer responses to conservation calls.

To stay consistent within this docket, the Company will use the parameters set forth in Item three of this order to determine when to initiate customer conservation calls. If the price exceeds five times the monthly WACOG the Company will initiate customer conservation calls. As soon as possible, the Company's Gas Supply department will determine the expected next day gas price, if these prices are over five times the monthly WACOG proper departments within the organization will be alerted to communicate this information with customers.

The Company will alert customers via website notifications, email communications, and through our social media platforms.

To study customer response to conservation calls the Company will review models of our expected gas usage without conservation calls and compare that to what the actual usage was during the conservation call. As there are many variables that could alter our expected usage, the Company will use the usage from the most consistent weather day of the same winter season. By comparing a similar weather day, the Company will have the ability to analyze the impacts the conservation call may have had on customers based on usage. If a customer call for conservation should occur during the 2025-2026 heating season, the Company will report our finding in the August 1, 2026, report.

The communications department will leverage social media to provide information and engage with customers.

During the 2024-2025 winter season, there were no conservation communications to our customers as prices never met the criteria set forth above. However, the Company continuously reaches out to customers throughout the year to provide energy and cost saving strategies,

including payment assistance resources, no- and low-cost savings tips, and energy efficiency programs. Outreach mechanisms include news releases, social media, customer emails and on-bill messages.

There was also no unauthorized gas usage during the 2024-2025 winter season, except for the one occurrence that happened in December due to a hit line by a third-party Company.

More information on this event will be reported in the AAA report on September 1, 2025.

The Company will continue this practice and report on our large volume interruptible customer responses in this report.

12. CenterPoint shall use the circumstances of the event, the prevailing winter, and the status of its fuel inventory to inform its peak-shaving dispatch decisions.

Gas Supply, Gas Control, and Peak Shaving departments work together closely to coordinate dispatch of the Company's peak shaving resources. For higher usage days, CenterPoint Energy meets customer needs by first utilizing (1) its baseload supplies, including hedged baseload, and (2) storage withdrawals, including its Company-owned underground storage. The Company then begins calling on its portfolio of available flexible supply sources, which includes daily call options and daily spot market gas purchases. If forecasted loads are above CenterPoint Energy's pipeline capacity entitlements, we will generally plan to curtail interruptible customers to bring the load forecast at or below entitlement levels. If the load forecast after curtailment is still above capacity entitlement, we then plan to add peaking supplies as needed to balance supplies with load. In addition, if the load is forecasted to exceed entitlements for a short period of time, making curtailment impractical, we may schedule peak shaving supplies to bridge and balance the peak.

CenterPoint Energy has not implemented any changes to its peak-shaving dispatch decisions strictly due to the occurrence of a designated price level the preceding trading day. However, the Company has and will evaluate going forward the need to dispatch its peak-shaving facilities on a case-by-case basis given the overall economic and situational condition of the utility and the market.

14. Xcel and CenterPoint shall file dynamic proposals for calling on peaking resources that recognize that these decisions depend on the economic and situational context of the utility and the market.

Per recommendations from CUB and the Department, CenterPoint Energy did not elect to implement a peak-shaving dispatch protocol based on any defined price threshold. The Company will continue to evaluate its dispatch decisions on a case-by-case basis taking into account current conditions of the market and utility and circumstances of the forthcoming event.

16. The Gas Utilities must include in future August compliance filings a report on how they are improving incorporation of curtailment calls into their gas supply planning processes for both reliability and economic purposes.

CenterPoint Energy continues to leverage curtailment to support the reliability of our distribution system, particularly in areas that show historical trends indicating the need to shed load. Additionally, when gas supply planning meetings occur daily, CenterPoint Energy reviews market conditions for economic concerns along with supply reliability concerns. Curtailment is one important tool in our daily decision making while we consider all supply options, expected weather,

recent market activity and peak shaving asset utilization. We continue to quantify expected load shed amounts in each rate category so we understand the impact that curtailment could provide should we need to leverage that tool.

Automated calling/texting system was incorporated in the 2023-24 heating season. This allows us to reach all the contacts at once in real time, rather than the lengthy process of manually calling customers and reaching only one contact. Customers with five or more accounts still receive a manual call to reduce any confusion. Daily Gas Supply calls are held at 7:00 a.m. with the on-call account manager attending. This allows us to know of specific curtailment for the day and to be aware of any potential calls from customers with questions. If we are aware of curtailment the day before, account managers will make an effort to notify the customer, so they are prepared. If Gas Control is aware of economic curtailment the day before, they will make calls to the customers that evening giving them ample time to be prepared for a curtailment the following gas day, which is at 9:00 a.m.

17. The Gas Utilities must report, in future August compliance filings, on how they are improving interruptible customer compliance with curtailment orders.

The steps that are currently taken with our interruptible customers to ensure compliance and reduce the occasion of unauthorized gas:

- Curtailment readiness email and/or meeting with 3rd party marketers/shippers every November
 - Meeting includes CNP Energy Solutions, Gas Control, and Transportation Services. The marketers typically have their gas purchasing, account managers, and back-office personnel at the meetings.
- On a monthly basis the curtailment spreadsheet/data base is updated for accuracy. This includes any account number changes, new interruptible customers, removal of customers no longer interruptible, 3rd party shipper changes, whether a customer is sales or transport, etc.
- On an annual basis we reach out to all our interruptible customers to obtain updated curtailment contacts
 - Due to retirements and personnel changes, this ensures we have the correct contacts.
 - The email mentions unauthorized charges and how critical it is for our system that customers curtail.
 - Multiple emails and phone calls are made by the key account managers (KAMs) to get as close to 100% reply as possible.
 - Separate from this exercise we receive the dual fuel certification form and the attestations from customers with less than three contacts.
- Seasonal Energy Management Seminars (SEMS)
 - Held annually in October, all our interruptible customers are invited to this. Two seminars are held, one in the south and one in the north.
 - Curtailment readiness is presented by a KAM and we typically will have a third party discuss backup system maintenance.
- Automated calling/texting system was incorporated in the 2023-24 heating season. This allows us to reach all the contacts at once in real time, rather than the lengthy process of manually calling customers and reaching only one contact. Customers with five or more accounts still receive a manual call to reduce any confusion.

- In person visits are required by all account managers to our key customers to cover various action items – Curtailment readiness is discussed along with the importance to both CNP and the customer for compliance.
- Daily gas Supply calls are held at 7:00 a.m. with the on-call account manager attending. This allows us to know of specific curtailment for the day and to be aware of any potential calls from customers with questions
 - If we are aware of curtailment the day before, account managers will make an effort to notify the customer, so they are prepared.
- Calls are made after each curtailment to all customers that have taken unauthorized gas. This allows the KAM to have a discussion of what went wrong and how to avoid it in the future.
- We had an initiative to reach out to our 46 smallest SVDF-A customers to see if there was any interest in switching to firm. These smaller customers are curtailed the least and may have more difficulty switching to their backup. After receiving approval from gas supply and engineering, 2 of those customers converted. Due to the small number, we have not pursued this anymore, most customers appreciate the interruptible discount.
- Continued communication on the part of the KAMs and our gas control/supply and engineering groups has helped with curtailment compliance.
- Cold weather equipment failures and lack of available backup fuel are always a point of concern for future curtailments.

18. The utility shall notify the Commission of a pricing event within 3 days of the first day gas prices spike to five times the PGA cost. The notification shall be filed in e-dockets and include the date of the initial price spike and the impacted hubs. In addition, if a gas utility in this docket pays prices on the daily spot market that exceed five times the average price of gas in the utility's filed purchased-gas adjustment for the current month when the gas was purchased, the utility shall make a filing to the Commission within 14 days following the last day of the price event identifying: A. Its costs for procuring gas for Minnesota customers while gas prices were inflated above this amount, B. What actions the utility took to account for or mitigate those costs, and C. Justifications for why its actions were prudent.

There were no filings made during the 2024-2025 season.

Conclusion

For the reasons stated above, CenterPoint Energy respectfully requests that the Commission accept this filing as meeting the expectations set forth in the Order issued February 17, 2023, under Docket No. G-008/M-21-138.

If you have questions about this filing, please contact me at (612) 321-4677 or Donald.Wynia@CenterPointEnergy.com.

Sincerely,

/s/

Donald Wynia

Regulatory Analyst, Regulatory Services

CenterPoint Energy

CERTIFICATE OF SERVICE

On Friday, August 1, 2025, Donald Wynia certifies that he served the attached Compliance Filing of CenterPoint Energy to all persons at the addresses indicated on the attached service list for Docket No. G-008/M-21-138 and Docket No. G-008/M-21-135 by having the document delivered via electronic filing.

/s/

Donald W. Wynia
Regulatory Analyst
CenterPoint Energy