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August 1, 2014

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

**RE: CenterPoint Energy Reply Comments to Comments of the Minnesota Department of Commerce, Division of Energy Resources
Docket No. G008/M-14-368**

Dear Dr. Haar:

CenterPoint Energy ("the Company") respectfully submits the following Reply Comments in response to the July 16, 2014 *Comments* of the Minnesota Department of Commerce, Division of Energy Resources ("DER") regarding the Company's 2013 *Demand-Side Management Financial Incentive and Conservation Improvement Program Tracker Report Compliance Filing* and the Company's *Request to Update its Conservation Improvement Adjustment Rider*.

Introduction

CenterPoint Energy has reviewed the DER Staff *Comments* and supports DER Staff's recommendations that the Minnesota Public Utilities Commission ("the Commission") approve the Company's proposed 2013 DSM financial incentive in the amount of \$10,890,131 and approve CenterPoint Energy's 2013 CIP Tracker account as summarized in Table 1 of the DER Staff's *Comments*.

As discussed in more detail below, CenterPoint Energy does not support DER Staff's recommendation pertaining to the Company's requested 2015 Conservation Cost Recovery Adjustment ("CCRA") or DER Staff's recommendation to discontinue the use of carrying charges for over or under recovered balances in the Company's CIP Tracker account. The Company supports the bill message language provided in DER Staff's *Comments*; however, does not support the CCRA amount provided therein.

The Company has one clarification regarding the 2013 CIP Tracker account. As DER Staff briefly discuss on page 4 of DER Staff's *Comments*, the Company's 2013 CIP Tracker account table provided on page 39 of the May 1, 2014 aggregated filing includes an adjustment to the total CCRA recovery in the month of January. CenterPoint Energy's firm customers are billed on one of 21 different billing cycles in each month. This means that most customers are billed for usage in the current billing month as well as usage in the previous month. When the 2013 CCRA was implemented on January 1, 2013, the Company billed customers the CCRA rate that was in effect at the time of the usage. Therefore customers' January bills contain a combination of usage billed at the newly effective 2013 CCRA rate (\$0.01426/therm) and

usage billed at the effective CCRA rate of the previous month (\$0.00981/therm).¹ To account for December 2012 volumes that were billed in January of 2013 at the lower CCRA rate, the Company embedded an adjustment of \$279,687 in the CIP Tracker account table. Without this adjustment, the table would have shown all January volumes as billed at the new CCRA rate, and thus overstate the actual recovery in that month.

Correction to CIP Tracker Projections

In the course of preparing these Reply Comments, the Company discovered a calculation error in the CIP Tracker projections for 2014 and 2015. The miscalculation was included in projections provided in the Company's May 1, 2014 aggregated filing as well as DER Staff's analysis in its July 16, 2014 *Comments*. The error affected monthly CIP recovery figures; however, it did not affect the annual total CIP recovery amounts. Because carrying charges accrue on a monthly basis, the total annual carrying charge projections were also affected. Therefore, the calculation correction slightly changes the overall CIP Tracker balance in both years; the corrected monthly recovery results in a lower year-end projected balance in both 2014 and 2015. See Attachment 1 for the corrected 2014 and 2015 CIP Tracker projections under the Company's approved 2014 CCRA rate and the Company's requested 2015 CCRA rate.² The calculation error was not present in the 2013 CIP Tracker Balance provided in the Company's May 1, 2014 filing.

The Company has discussed the correction with DER Staff. Though the revision to projected CIP recovery would have a minor impact on the specific CCRA calculations and projections provided by DER Staff, the Company will focus the following discussion on the principles and methodology of DER Staff's *Comments* rather than the specific figures provided therein. The Company has provided corrected calculations using the DER Staff's recommended CCRA rate in the table included on page three of this filing. However, the minor effect of the calculation correction had no impact on the substance of the Company's discussion.

CenterPoint Energy's CCRA Background

In CenterPoint Energy's 2008 rate case (Docket No. G008/GR-08-1075), the Company was granted approval to implement a CCRA to better match recovery to the timing of CIP expenditures. As the DER Staff stated, "(t)his rider would allow the Company to true up, on an annual basis, the amount of CIP costs collected through base rates with the actual amount of CIP cost incurred during that annual period" (Direct Testimony of Department of Commerce witness Bryan J Minder; page 18). The Company's first CCRA was implemented in November of 2010.

2015 CCRA Amount and Methodology

In the July 16, 2014 *Comments*, DER Staff recommended that the Commission not approve the Company's requested 2015 CCRA rate of \$0.00884 per therm and instead proposed a CCRA rate of \$0.002626 per therm³, which DER Staff selected because it was the amount that result in carrying charges that are "as close to zero as possible." Under DER Staff's recommended CCRA, the Company's

¹ For example, a customer may have a billing cycle that includes natural gas consumption from the 15th of one month to the 14th of the next month. Therefore, a rate change on the first of the month would require a proration of the customer's usage between the new and old rate.

² Attachment 1 of this filing is a corrected version of Attachment B from the Company's May 1, 2014 aggregated filing.

³ The Company's billing system can only account to the fifth decimal place per therm. Therefore, the Company will round to the fifth decimal place if the Commission adopts DER Staff's proposed CCRA rate.

CIP Tracker account under-recovered balance would nearly double over the course of 2015. DER Staff assert that “the large year-end balance for the CIP tracker account reflects the seasonal variations of the CIP recovery” and does not reflect the overall level of under-recovery. DER Staff contend that the CCRA amount should be calibrated to maintain the lowest possible year-end total in carrying charges.⁴

While the Company agrees that it is important to manage carrying charges, the Company believes the best way to limit carrying charges is to match CIP recovery to approved CIP costs and maintain a low CIP Tracker account balance. Timely recovery mitigates carrying charges, as carrying charges only accrue to under-recovered and over-recovered balances in the CIP Tracker.

Though it is true that the CIP Tracker account balance fluctuates throughout the year due to seasonal variations in CIP spending and recovery, the Company believes it is important to look at the total 12-month cycle as a whole and balance recovery to spending. The tables below summarize the 2015 12-month total expenditures (including the Company’s beginning, under-recovered balance for 2015) in comparison to total recovery that would result from the DER Staff CCRA rate recommendation and the Company’s CCRA rate request. The analysis provided in this table excludes carrying charges in order to focus on the structural concept of balancing recovery with expenses.

	DER Recommendation (Table 3 of Comments - revised for calculation error)	CenterPoint Energy Summary of CIP Tracker and Proposed Recovery (revised for calculation error)
Starting Balance (1/1/2015)	\$ 6,245,884	\$ 6,245,884
Approved 2015 CIP Budget	\$ 25,569,528	\$ 25,569,528
2014 DSM Financial Incentive (Estimated)	\$ 8,506,837	\$ 8,506,837
Total	\$ 40,322,249	\$ 40,322,249
CCRC Projected Recovery	\$ (24,892,688)	\$ (24,892,688)
CCRA Projected Recovery	\$ (3,503,119)	\$ (11,792,677)
Total Projected Recovery	\$ (28,395,807)	\$ (36,685,365)
Difference between Total Recovery and Total Expenditures	\$ 11,926,442	\$ 3,636,884

As illustrated above, DER Staff’s proposed CCRA recovery rate results in a significant gap between the total recovery and the total amount spent, and under-recovered, in 2015. Regardless of program cycles or schedules, that nearly \$12 million gap must be collected in order to recover the CIP Tracker balance. The Company thinks it is most responsible to implement the Company’s requested CCRA rate of \$0.00884 per therm, which would substantially reduce the CIP Tracker account balance; provide for timely recovery of prudently incurred CIP expenses; avoid sharp increases in rates the following year; and manage carrying charges over the long-term.

⁴ CenterPoint Energy’s analysis of DER Staff’s CCRA recommendation assumes no change in how carrying charges are applied in 2015 or beyond, in keeping with Staff’s methodology in calculating their recommended CCRA. The Company notes that in the July 16, 2014 *Comments*, Staff also recommend a change in how carrying charges are applied, which would affect the CCRA calculation methodology.

Allowing the 2015 year-end under-recovered balance to grow to nearly \$12 million would necessitate a sharp hike in rates in the following year in order to recover that large balance. DER Staff's recommended methodology of designing a CCRA amount that would result in maintaining year-end carrying charges as close to zero as possible, not only undermines the timeliness of recovering CIP expenses, but would also result in a cycle of sharp ups and downs in the CCRA amount every other year. For example, as shown in Attachment 2, under DER Staff's proposal of a 2015 CCRA rate of \$0.002626 per therm (and assuming the same CIP budget and financial incentive as 2015 as an approximation for 2016), the 2016 CCRA rate required to minimize the year-end carrying charge amount would be \$0.00896 per therm – more than a 240 percent increase over the DER Staff's proposed rate in the previous year.⁵ Further, even with this steep rate increase in 2016, DER Staff's methodology would result in a 2016 year-end under-recovery of \$9.1 million.

Large unrecovered balances must be mitigated in order to allow for timely recovery of program expenses and avoid future acute increases in rates. CenterPoint Energy believes the Company's requested increase to the 2015 CCRA will have a modest impact on ratepayers and prevent future dramatic rate increases, while also allowing for timely recovery of CIP expenses. Adopting DER Staff's recommended CCRA for 2015 would delay, but not avoid the need for an increase in rates; delaying the increase in rates will only exaggerate the increase required the following year as the under-recovered CIP Tracker balance grows. Moreover, designing a CCRA rate to maintain carrying charges at a specific level fails to meet the original goal of the CCRA rider, which is to "true up, on an annual basis, the amount of CIP costs collected through base rates with the actual amount of CIP cost incurred during that annual period" (Direct Testimony of Department of Commerce witness Bryan J Minder; page 18). The Company, therefore, respectfully requests that the Commission approve the Company's originally requested CCRA rate of \$0.0884 per therm.

Carrying Charges Applied to the CIP Tracker Account

Carrying costs can be both due from and payable to customers – carrying charges are due from customers when the Company has not fully recovered the CIP costs incurred on a timely basis and carrying charges are payable to customers when the company has recovered from customers before the CIP costs are incurred. Carrying charges are applied to the Company's investments in conservation at a rate in keeping with the Company's allowed rate of return on rate base. The use of the allowed rate of return is appropriate because CIP expenses:

1. are prudently incurred costs as established under Minnesota law and policy;
2. have been and will continue to be ongoing business costs; and
3. are an ongoing cash working capital item, not unlike any other working capital item included in rate base.

In the July 16, 2014 *Comments*, DER Staff propose that the Commission remove carrying charges from CenterPoint Energy's CIP Tracker account. The Company strongly opposes DER Staff's request to remove carrying charges from the CIP Tracker account for over or under recovered balances associated with CIP program expenses for the reasons enumerated above. CIP program expenses represent an investment in conservation. That investment diverts cash working capital from other potential investments and, therefore, should have the same allowed rate return as those other investment options. Timely cost

⁵ The Company calculated the projected 2016 CCRA rate that would be derived from DER Staff's proposed methodology by assuming the same budget and financial incentive as used in the 2015 projections; using Staff's projected 2015 year-end under-recovered balance of \$12,015,848 as the beginning 2016 balance; and solving for the CCRA rate that would result in total year-end carrying charges of zero.

recovery and appropriate carrying charges are important for promoting investment in conservation and, ultimately, achieving Minnesota's energy efficiency goals.

History of CenterPoint Energy's Application of Carrying Costs to the CIP Tracker

Prior to CenterPoint Energy's 2008 rate case, the Company's CIP Tracker was included in rate base in order to recover CIP costs. When included in rate base, the Company's CIP Tracker balance received the allowed rate of return. In direct testimony in the 2008 rate case, the DER recommended that the CIP Tracker not be included in rate base and that instead, carrying charges should be applied to the CIP Tracker balance. The DER stated that:

"The interest on unrecovered CIP expenses should occur solely in the CIP tracker account. This approach is appropriate for several reasons. First, this approach would provide greater transparency for ratepayers and regulators regarding the cost of CIP. That is, this approach would allow the Commission and interested parties to evaluate, in the Company's annual CIP cost recovery filings, the specific proposed carrying charges in relation to the actual CIP tracker account balances. ... Applying carrying charges solely in the CIP tracker account would ensure that carrying charges are appropriate relative to the actual CIP tracker account balances" (Direct Testimony of Department of Commerce witness Bryan J Minder; starting on page 12).

As was stated in the Company's 2008 rebuttal testimony, the Company believes including the CIP Tracker balance in rate base is appropriate; the Company also views the DER Staff's (then) recommendation to apply carrying costs within the CIP Tracker account as an acceptable alternative since both options include an allowed rate of return to reflect the time value of money to both the utility and customers. Following resolution of the Company's 2008 rate case, the CIP Tracker account was removed from base rates and the Company applied carrying charges to the CIP Tracker account.

Alternative Carrying Charges Options

The Company supports the current application of carrying charges in the Company's CIP Tracker account. However, if the Commission adopts the current DER Staff recommendation to discontinue carrying charges, the Company proposes that implementation be delayed until the start of the test year in the next CenterPoint Energy Minnesota gas rate case so that the CIP Tracker balance can be included in rate base and legitimate utility costs associated with the timely recovery of CIP expenses are not disallowed.

In the July 16, 2014 *Comments*, the DER Staff recommend that if the Commission allows the continued use of carrying charges in CIP Tracker, that carrying charges be removed from the DSM financial incentive. Since the DSM financial incentive is not an out-of-pocket cost incurred by the Company in administering its CIP programs, the Company does not oppose the recommendation that carrying charges not be applied to the financial incentive on a going-forward basis. The Company notes that there may be several methodological options for removing carrying charges from the DSM financial incentive. If the Commission adopts the DER Staff's recommendation to remove carrying charges from the DSM financial incentive, the Company would work with DER Staff to find an acceptable method to do so.

CenterPoint Energy Requests

In sum, the Company requests that the Commission:

1. approve the Company's requested 2013 DSM financial incentive of \$10,890,131;

2. approve the Company's 2013 CIP Tracker account as summarized on page 39 of the Company's May 1, 2014 aggregated filing;
3. approve the Company's requested CCRA rate of \$0.00884 per therm, effective on January 1, 2015;
4. continue applying carrying charges to the Company's CIP Tracker; and
5. approve the Company's requested bill message as stated on page 43 of the Company's May 1, 2014 aggregated filing.

Following Commission approval, the Company will record the DSM financial incentive in its CIP Tracker account as of the date of the Commission's final *Order*.

Please contact me at 612-321-4318 with any questions.

Sincerely,

/s/ Audrey C. Peer

Audrey C. Peer
Regulatory Analyst, Conservation Improvement Program

C: Service List

Attachment 1

CenterPoint Energy Minnesota Gas
 CIP Tracker and Balance
 2014 Forecast (Revised)
 Current Approved CCRA of \$0.659/Dth
 CCRC (CenterPoint Energy's 2013 Rate Case)

	Jan 14 Actual	Feb 14 Actual	Mar 14 Actual	Apr 14 Forecast	May 14 Forecast	June 14 Forecast	July 14 Forecast	Aug 14 Forecast	Sept 14 Forecast	Oct 14 Forecast	Nov 14 Forecast	Dec 14 Forecast	Annual Summary	
Expenses														
1	Beginning Tracker Balance (\$) - Under / (Over) Recovered	8,501,064	2,442,584	(2,687,961)	(6,628,911)	(8,222,920)	(8,586,302)	(8,592,400)	(8,144,215)	(7,441,039)	(6,829,416)	(6,383,736)	(6,617,102)	8,501,064
2	CIP Program Expenditures	1,471,242	1,555,166	2,280,921	1,360,884	1,531,549	1,266,775	1,484,709	1,701,388	1,625,878	1,977,837	2,344,717	6,232,693	24,833,758
3	Performance Incentive	-	-	-	-	-	-	-	-	-	-	-	10,890,131	10,890,131
4	Total Expenses & Incentive (Lines 1 + 2 + 3)	9,972,306	3,997,749	(407,040)	(5,268,027)	(6,691,371)	(7,319,527)	(7,107,691)	(6,442,827)	(5,815,160)	(4,851,580)	(4,039,019)	10,505,722	44,224,953
Recovery														
5	Total Volumes (Dt)	33,488,800	29,112,856	26,368,771	13,363,176	9,250,737	6,886,559	6,823,345	6,484,562	5,784,696	7,858,141	12,079,398	19,327,973	176,829,015
6	Exemptions (Dt)	(3,616,201)	(2,691,929)	(1,868,592)	(1,835,400)	(1,928,554)	(2,028,100)	(2,891,400)	(2,689,400)	(1,913,000)	(1,925,878)	(2,009,811)	(2,324,577)	(27,722,842)
7	Volumes less Exemptions (Dt)	29,872,599	26,420,927	24,500,179	11,527,776	7,322,183	4,858,459	3,931,945	3,795,162	3,871,696	5,932,263	10,069,587	17,003,396	149,106,173
8	Base Rate Recovery (CCRC) (per Dt)	0.1866	0.1866	0.1866	0.1866	0.1866	0.1866	0.1866	0.1866	0.1866	0.1866	0.1866	0.1866	
9	Base Rate Cost Recovery (\$)	(5,574,227)	(4,930,145)	(4,571,733)	(2,151,083)	(1,366,319)	(906,588)	(733,701)	(708,177)	(722,459)	(1,106,960)	(1,878,985)	(3,172,834)	(27,823,211)
10	CCRA (per Dt)	0.0659	0.0659	0.0659	0.0659	0.0659	0.0659	0.0659	0.0659	0.0659	0.0659	0.0659	0.0659	
11	CCRA Recovery (\$)	(1,968,604)	(1,741,139)	(1,614,562)	(759,680)	(482,532)	(320,172)	(259,115)	(250,101)	(255,145)	(390,936)	(663,586)	(1,120,524)	(9,826,096)
12	Total Recovery (Line 9 + Line 11)	(7,542,831)	(6,671,284)	(6,186,295)	(2,910,763)	(1,848,851)	(1,226,760)	(992,816)	(958,278)	(977,604)	(1,497,896)	(2,542,571)	(4,293,358)	(37,649,307)
Carrying Charges														
13	Sub-Balance (\$) (Line 4 + Line 12)	2,429,475	(2,673,535)	(6,593,335)	(8,178,790)	(8,540,222)	(8,546,287)	(8,100,507)	(7,401,105)	(6,792,764)	(6,349,476)	(6,581,590)	6,212,364	6,575,646
14	Accum. Deferred Tax (Line 13 x 41.37% x -1)	(1,005,074)	1,106,041	2,727,663	3,383,565	3,533,090	3,535,599	3,351,180	3,061,837	2,810,167	2,626,778	2,722,804	(2,570,055)	
15	Net Investment (Line 13 + Line 14)	1,424,401	(1,567,493)	(3,865,672)	(4,795,225)	(5,007,132)	(5,010,688)	(4,749,327)	(4,339,268)	(3,982,598)	(3,722,698)	(3,858,786)	3,642,309	
16	Carrying Charge Rate	0.92%	0.92%	0.92%	0.92%	0.92%	0.92%	0.92%	0.92%	0.92%	0.92%	0.92%	0.92%	
17	Carrying Charge (Line 15 x Line 16)	13,109	(14,426)	(35,576)	(44,130)	(46,080)	(46,113)	(43,708)	(39,934)	(36,652)	(34,260)	(35,512)	33,520	(329,762)
18	Ending Tracker Balance - Under / (Over) Recovered (Line 13 + Line 17)	2,442,584	(2,687,961)	(6,628,911)	(8,222,920)	(8,586,302)	(8,592,400)	(8,144,215)	(7,441,039)	(6,829,416)	(6,383,736)	(6,617,102)	6,245,884	

Attachment 1

CenterPoint Energy Minnesota Gas
 CIP Tracker and Balance
 2015 Forecast (Revised)
 CCRC (CenterPoint Energy's 2013 Rate Case)
 CenterPoint Energy Proposed CCRA Rate

	Jan 15 Forecast	Feb 15 Forecast	Mar 15 Forecast	Apr 15 Forecast	May 15 Forecast	June 15 Forecast	July 15 Forecast	Aug 15 Forecast	Sept 15 Forecast	Oct 15 Forecast	Nov 15 Forecast	Dec 15 Forecast	Annual Summary	
Expenses														
1	Beginning Tracker Balance (\$) - Under / (Over) Recovered	6,245,884	1,250,411	(3,141,819)	(6,465,937)	(8,298,033)	(8,802,916)	(8,899,789)	(8,518,416)	(7,875,845)	(7,328,098)	(7,019,403)	(7,289,301)	6,245,884
2	CIP Program Expenditures	1,369,146	1,933,814	1,929,507	1,382,575	1,555,960	1,286,966	1,508,374	1,728,507	1,651,793	1,977,738	2,538,359	6,706,789	25,569,528
3	Performance Incentive	-	-	-	-	-	-	-	-	-	-	-	\$8,506,837	8,506,837
4	Total Expenses & Incentive (Lines 1 + 2 + 3)	7,615,030	3,184,224	(1,212,311)	(5,083,362)	(6,742,073)	(7,515,950)	(7,391,415)	(6,789,909)	(6,224,053)	(5,350,360)	(4,481,044)	7,924,326	40,322,249
Recovery														
5	Total Volumes (Dt)	25,432,627	24,823,532	21,089,339	13,363,176	9,250,737	6,886,559	6,823,345	6,484,562	5,784,696	7,858,141	12,079,398	19,327,973	159,204,086
6	Exemptions (Dt)	(2,264,156)	(1,881,050)	(2,111,431)	(1,835,400)	(1,928,554)	(2,028,100)	(2,891,400)	(2,689,400)	(1,913,000)	(1,925,878)	(2,009,811)	(2,324,577)	(25,802,757)
7	Volumes less Exemptions (Dt)	23,168,471	22,942,482	18,977,908	11,527,776	7,322,183	4,858,459	3,931,945	3,795,162	3,871,696	5,932,263	10,069,587	17,003,396	133,401,329
8	Base Rate Recovery (CCRC) (per Dt)	0.1866	0.1866	0.1866	0.1866	0.1866	0.1866	0.1866	0.1866	0.1866	0.1866	0.1866	0.1866	
9	Base Rate Cost Recovery (\$)	(4,323,237)	(4,281,067)	(3,541,278)	(2,151,083)	(1,366,319)	(906,588)	(733,701)	(708,177)	(722,459)	(1,106,960)	(1,878,985)	(3,172,834)	(24,892,688)
10	CCRA (per Dt)	0.0884	0.0884	0.0884	0.0884	0.0884	0.0884	0.0884	0.0884	0.0884	0.0884	0.0884	0.0884	
11	CCRA Recovery (\$)	(2,048,093)	(2,028,115)	(1,677,647)	(1,019,055)	(647,281)	(429,488)	(347,584)	(335,492)	(342,258)	(524,412)	(890,152)	(1,503,100)	(11,792,677)
12	Total Recovery (Line 9 + Line 11)	(6,371,330)	(6,309,182)	(5,218,925)	(3,170,138)	(2,013,600)	(1,336,076)	(1,081,285)	(1,043,669)	(1,064,717)	(1,631,372)	(2,769,137)	(4,675,934)	(36,685,365)
Carrying Charges														
13	Sub-Balance (\$) (Line 4 + Line 12)	1,243,700	(3,124,958)	(6,431,236)	(8,253,500)	(8,755,673)	(8,852,026)	(8,472,700)	(7,833,578)	(7,288,770)	(6,981,732)	(7,250,181)	3,248,392	3,636,884
14	Accum. Deferred Tax (Line 13 x 41.37% x -1)	(514,519)	1,292,795	2,660,602	3,414,473	3,622,222	3,662,083	3,505,156	3,240,751	3,015,364	2,888,343	2,999,400	(1,343,860)	
15	Net Investment (Line 13 + Line 14)	729,181	(1,832,163)	(3,770,634)	(4,839,027)	(5,133,451)	(5,189,943)	(4,967,544)	(4,592,827)	(4,273,406)	(4,093,389)	(4,250,781)	1,904,532	
16	Carrying Charge Rate	0.92%	0.92%	0.92%	0.92%	0.92%	0.92%	0.92%	0.92%	0.92%	0.92%	0.92%	0.92%	
17	Carrying Charge (Line 15 x Line 16)	6,711	(16,861)	(34,701)	(44,533)	(47,243)	(47,763)	(45,716)	(42,267)	(39,328)	(37,671)	(39,120)	17,527	(370,965)
18	Ending Tracker Balance - Under / (Over) Recovered (Line 13 + Line 17)	1,250,411	(3,141,819)	(6,465,937)	(8,298,033)	(8,802,916)	(8,899,789)	(8,518,416)	(7,875,845)	(7,328,098)	(7,019,403)	(7,289,301)	3,265,919	

Attachment 2

CenterPoint Energy Minnesota Gas
 CIP Tracker and Balance
 2015 Forecast
 CCRC (CenterPoint Energy's 2013 Rate Case)
 DER Proposed CCRA Rate

	Jan 15 Forecast	Feb 15 Forecast	Mar 15 Forecast	Apr 15 Forecast	May 15 Forecast	June 15 Forecast	July 15 Forecast	Aug 15 Forecast	Sept 15 Forecast	Oct 15 Forecast	Nov 15 Forecast	Dec 15 Forecast	Annual Summary	
Expenses														
1	Beginning Tracker Balance (\$) - Under / (Over) Recovered	6,245,884	2,697,868	(253,215)	(2,376,097)	(3,465,925)	(3,487,280)	(3,251,937)	(2,594,441)	(1,682,803)	(859,755)	(145,539)	250,754	6,245,884
2	CIP Program Expenditures	1,369,146	1,933,814	1,929,507	1,382,575	1,555,960	1,286,966	1,508,374	1,728,507	1,651,793	1,977,738	2,538,359	6,706,789	25,569,528
3	Performance Incentive	-	-	-	-	-	-	-	-	-	-	-	\$8,506,837	8,506,837
4	Total Expenses & Incentive (Lines 1 + 2 + 3)	7,615,030	4,631,681	1,676,293	(993,522)	(1,909,965)	(2,200,314)	(1,743,563)	(865,934)	(31,011)	1,117,983	2,392,820	15,464,381	40,322,249
Recovery														
5	Total Volumes (Dt)	25,432,627	24,823,532	21,089,339	13,363,176	9,250,737	6,886,559	6,823,345	6,484,562	5,784,696	7,858,141	12,079,398	19,327,973	159,204,086
6	Exemptions (Dt)	(2,264,156)	(1,881,050)	(2,111,431)	(1,835,400)	(1,928,554)	(2,028,100)	(2,891,400)	(2,689,400)	(1,913,000)	(1,925,878)	(2,009,811)	(2,324,577)	(25,802,757)
7	Volumes less Exemptions (Dt)	23,168,471	22,942,482	18,977,908	11,527,776	7,322,183	4,858,459	3,931,945	3,795,162	3,871,696	5,932,263	10,069,587	17,003,396	133,401,329
8	Base Rate Recovery (CCRC) (per Dt)	0.1866	0.1866	0.1866	0.1866	0.1866	0.1866	0.1866	0.1866	0.1866	0.1866	0.1866	0.1866	
9	Base Rate Cost Recovery (\$)	(4,323,237)	(4,281,067)	(3,541,278)	(2,151,083)	(1,366,319)	(906,588)	(733,701)	(708,177)	(722,459)	(1,106,960)	(1,878,985)	(3,172,834)	(24,892,688)
10	CCRA (per Dt)	0.02626	0.02626	0.02626	0.02626	0.02626	0.02626	0.02626	0.02626	0.02626	0.02626	0.02626	0.02626	
11	CCRA Recovery (\$)	(608,404)	(602,470)	(498,360)	(302,719)	(192,281)	(127,583)	(103,253)	(99,661)	(101,671)	(155,781)	(264,427)	(446,509)	(3,503,119)
12	Total Recovery (Line 9 + Line 11)	(4,931,641)	(4,883,537)	(4,039,638)	(2,453,802)	(1,558,600)	(1,034,171)	(836,954)	(807,838)	(824,130)	(1,262,741)	(2,143,412)	(3,619,343)	(28,395,807)
Carrying Charges														
13	Sub-Balance (\$) (Line 4 + Line 12)	2,683,389	(251,856)	(2,363,345)	(3,447,324)	(3,468,565)	(3,234,485)	(2,580,517)	(1,673,772)	(855,141)	(144,758)	249,408	11,845,038	11,926,442
14	Accum. Deferred Tax (Line 13 x 41.37% x -1)	(1,110,118)	104,193	977,716	1,426,158	1,434,946	1,338,106	1,067,560	692,440	353,772	59,886	(103,180)	(4,900,292)	
15	Net Investment (Line 13 + Line 14)	1,573,271	(147,663)	(1,385,629)	(2,021,166)	(2,033,620)	(1,896,379)	(1,512,957)	(981,333)	(501,369)	(84,872)	146,228	6,944,745	
16	Carrying Charge Rate	0.92%	0.92%	0.92%	0.92%	0.92%	0.92%	0.92%	0.92%	0.92%	0.92%	0.92%	0.92%	
17	Carrying Charge (Line 15 x Line 16)	14,479	(1,359)	(12,752)	(18,601)	(18,715)	(17,452)	(13,924)	(9,031)	(4,614)	(781)	1,346	63,912	(17,492)
18	Ending Tracker Balance - Under / (Over) Recovered (Line 13 + Line 17)	2,697,868	(253,215)	(2,376,097)	(3,465,925)	(3,487,280)	(3,251,937)	(2,594,441)	(1,682,803)	(859,755)	(145,539)	250,754	11,908,950	

Attachment 2

CenterPoint Energy Minnesota Gas
 CIP Program Expens Tracker and Balance
 2016 Forecast - using DER Proposed Rates in 2015 to get to 0 carrying charges in 2016
 Estimated Proposed CCRC (CenterPoint Energy's upcoming 2013 Rate Case)

	Jan 16 Forecast	Feb 16 Forecast	Mar 16 Forecast	Apr 16 Forecast	May 16 Forecast	June 16 Forecast	July 16 Forecast	Aug 16 Forecast	Sept 16 Forecast	Oct 16 Forecast	Nov 16 Forecast	Dec 16 Forecast	Annual Summary	
Expenses														
1	Beginning Tracker Balance (\$) - Under / (Over) Recovered	11,908,950	6,916,239	2,527,056	(789,242)	(2,604,539)	(3,087,486)	(3,159,348)	(2,751,719)	(2,082,587)	(1,508,226)	(1,175,246)	(1,425,690)	11,908,950
2	CIP Program Expenditures (approximated using 2015 budget)	1,369,146	1,933,814	1,929,507	1,382,575	1,555,960	1,286,966	1,508,374	1,728,507	1,651,793	1,977,738	2,538,359	6,706,789	25,569,528
3	Performance Incentive (approximated using 2014 plan)	-	-	-	-	-	-	-	-	-	-	-	\$8,506,837	8,506,837
4	Total Expenses & Incentive (Lines 1 + 2 + 3)	13,278,096	8,850,052	4,456,564	593,333	(1,048,579)	(1,800,520)	(1,650,974)	(1,023,212)	(430,795)	469,512	1,363,113	13,787,937	45,985,315
Recovery														
5	Total Volumes (Dt)	25,432,627	24,823,532	21,089,339	13,363,176	9,250,737	6,886,559	6,823,345	6,484,562	5,784,696	7,858,141	12,079,398	19,327,973	159,204,086
6	Exemptions (Dt)	(2,264,156)	(1,881,050)	(2,111,431)	(1,835,400)	(1,928,554)	(2,028,100)	(2,891,400)	(2,689,400)	(1,913,000)	(1,925,878)	(2,009,811)	(2,324,577)	(25,802,757)
7	Volumes less Exemptions (Dt)	23,168,471	22,942,482	18,977,908	11,527,776	7,322,183	4,858,459	3,931,945	3,795,162	3,871,696	5,932,263	10,069,587	17,003,396	133,401,329
8	Base Rate Recovery (CCRC) (per Dt)	0.1866	0.1866	0.1866	0.1866	0.1866	0.1866	0.1866	0.1866	0.1866	0.1866	0.1866	0.1866	
9	Base Rate Cost Recovery (\$)	(4,323,237)	(4,281,067)	(3,541,278)	(2,151,083)	(1,366,319)	(906,588)	(733,701)	(708,177)	(722,459)	(1,106,960)	(1,878,985)	(3,172,834)	(24,892,688)
10	CCRA (per Dt)	0.0896	0.0896	0.0896	0.0896	0.0896	0.0896	0.0896	0.0896	0.0896	0.0896	0.0896	0.0896	
11	CCRA Recovery (\$)	(2,075,738)	(2,055,491)	(1,700,292)	(1,032,811)	(656,018)	(435,285)	(352,276)	(340,021)	(346,878)	(531,491)	(902,167)	(1,523,389)	(11,951,857)
12	Total Recovery (Line 9 + Line 11)	(6,398,975)	(6,336,558)	(5,241,570)	(3,183,894)	(2,022,337)	(1,341,873)	(1,085,977)	(1,048,198)	(1,069,337)	(1,638,451)	(2,781,152)	(4,696,223)	(36,844,545)
Carrying Charges														
13	Sub-Balance (\$) (Line 4 + Line 12)	6,879,121	2,513,494	(785,006)	(2,590,561)	(3,070,916)	(3,142,393)	(2,736,951)	(2,071,410)	(1,500,132)	(1,168,939)	(1,418,039)	9,091,714	9,140,770
14	Accum. Deferred Tax (Line 13 x 41.37% x -1)	(2,845,892)	(1,039,833)	324,757	1,071,715	1,270,438	1,300,008	1,132,277	856,943	620,604	483,590	586,643	(3,761,242)	
15	Net Investment (Line 13 + Line 14)	4,033,228	1,473,662	(460,249)	(1,518,846)	(1,800,478)	(1,842,385)	(1,604,675)	(1,214,468)	(879,527)	(685,349)	(831,396)	5,330,472	
16	Carrying Charge Rate	0.92%	0.92%	0.92%	0.92%	0.92%	0.92%	0.92%	0.92%	0.92%	0.92%	0.92%	0.92%	
17	Carrying Charge (Line 15 x Line 16)	37,118	13,562	(4,236)	(13,978)	(16,570)	(16,955)	(14,768)	(11,177)	(8,094)	(6,307)	(7,651)	49,056	-
18	Ending Tracker Balance - Under / (Over) Recovered (Line 13 + Line 17)	6,916,239	2,527,056	(789,242)	(2,604,539)	(3,087,486)	(3,159,348)	(2,751,719)	(2,082,587)	(1,508,226)	(1,175,246)	(1,425,690)	9,140,770	

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Scot	McClure		Interstate Power And Light Company	4902 N Biltmore Ln PO Box 77007 Madison, WI 537071007	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
John	McWilliams	jmm@dairy.net	Dairyland Power Cooperative	3200 East Ave SPO Box 817 La Crosse, WI 54601-7227	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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Gary	Olson		Product Recovery, Inc.	2605 E Cliff Rd Burnsville, MN 55337	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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