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May 12, 2016

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

RE: Annual Compliance Submission of CenterPoint Energy Minnesota Gas, A Division of CenterPoint Energy Resources Corp., for its Gas Affordability Service Program; MPUC Docket No. G-008/M-16-266

Dear Mr. Wolf:

On March 31, 2016 CenterPoint Energy ("the Company") submitted its Gas Affordability Program 2015 Annual Compliance Report. On May 2, 2016, the Minnesota Department of Commerce ("Department") filed Comments on CenterPoint Energy's Annual Report and recommended the Minnesota Public Utilities Commission ("Commission") accept CenterPoint Energy's Gas Affordability Program 2015 Annual Compliance Report.

The Company appreciates the Department's review and analysis and agrees with the Department's recommendation to accept CenterPoint Energy's GAP Report submitted in Docket No. G-008/M-16-266. Therefore, CenterPoint Energy respectfully requests the Commission accept its Gas Affordability Program 2015 Annual Compliance Report.

In addition, the Department discussed the utilities' comments on alternative GAP surcharge allocations. In response, the Company notes that while there may be indirect cost savings from reduced bad debt expense and reduced meter disconnections which benefit other customer classes, the same was also true in 2006 when the Commission made its original determination.¹ As a result, the Company is not aware of any new information justifying a change to the current GAP surcharge allocation method. However, if the Commission wishes to pursue this matter further, the Company can provide additional information in next year's annual compliance report to more fully develop the record as requested in the Department's Comments.²

¹ Docket No. G-008/GR-05-1380, *Findings of Fact, Conclusions of Law, and Order* (November 2, 2006).

² The Company currently files information on curtailment for the 2014-2015, 2015-2016, and 2016-2017 gas years pursuant to Docket No. G-008/AA-14-752, *Order Accepting Gas Utilities' Annual Automatic Adjustment Reports and 2013-2014 True-Up Proposals and Setting Further Requirements* (August 24, 2015).

Finally, the Company identified a typographical error in the Department's comments on *Table 1: Typical Bill Impacts (excl. Market Rate)*. For Rate Class SVDF B-Transport, the amount should read \$831.94, as submitted in the Company's initial filing.

If you have any questions about this information, please contact me at (612) 321-4905.

Sincerely,

/s/

Shari Grams
Regulatory Analyst

cc: Service List

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