



505 Nicollet Mall
P.O. Box 59038
Minneapolis, MN 55459-0038

January 5, 2021

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

VIA E-FILING

**RE: Petition of CenterPoint Energy for Approval of a Rule Variance to Minnesota Rules Regarding Supplier (Pipeline) Refunds – Supplemental Reply Comments to the Department’s Supplemental Comments
Docket Number G-008/M-20-838**

Dear Mr. Seuffert:

On November 23, 2020, CenterPoint Energy (the “Company”) submitted a request for approval of a variance to Minnesota Public Utilities Commission (“Commission”) Rules Regarding Supplier Refunds- Minnesota Rule 7825.2700, Subp. 8. (Refunds) in accordance with the requirements of 7829.3200 (Other Variances).

On January 4, 2021, the Department of Commerce, Division of Energy Resources (the “Department”) filed Supplemental Comments in response to the Company’s December 28, 2020 Reply Comments. The updated recommendation included that the Commission:

- **approve** the Company’s proposed refund amount and interest calculations.
- **approve** CenterPoint’s calculation of the refund amount per unit and allocation to customer classes.
- **approve** the Company’s proposal to provide a bill credit to all customers who have active accounts as of the date of the refund.
- **approve** the Company’s requested variance to Minn. R. 7825.2700, subp. 8 relating to the use of 4 months of customer data to determine the refund per unit amount.
- **approve** the Company’s requested variance to Minn. R. 7825.2700, subp. 8 that would allow CenterPoint more than 90 days to provide the refund discussed in CenterPoint’s Reply Comments.
- **require** CenterPoint to report on the status and provide a reconciliation of the refund’s disbursement.

The Company supports the recommendations outlined in the Department’s analysis and confirms it will provide a reconciliation of the refunds in a subsequent compliance filing after the refunds are processed.

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

CERTIFICATE OF SERVICE

Marie Doyle served the Petition for Approval of a Variance to the Purchased Gas Adjustment Refund Rule – Supplemental Reply Comments of CenterPoint Energy to all persons at the addresses indicated on the attached list by having the document delivered by electronic filing.

/s/

Marie Doyle
Regulatory Analyst
CenterPoint Energy

January 5, 2021

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-838_M-20-838
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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-838_M-20-838
Seth	DeMerritt	Seth.DeMerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_20-838_M-20-838
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Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_20-838_M-20-838

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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	No	OFF_SL_20-838_M-20-838
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