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August 4, 2021

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

**RE: In the Matter of CenterPoint Energy Minnesota Gas 2020 Gas Affordability Program (GAP) Report**

**Reply Comments**

**Docket No. G-008/M-21-218**

Dear Mr. Seuffert:

On March 31, 2021, CenterPoint Energy CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or the "Company") filed its 2020 Gas Affordability Program ("GAP") Annual Report. The Minnesota Public Utilities Commission ("Commission") issued a Notice of Comment on April 16, 2021, and responsive Initial and Reply Comments were filed. On June 21, 2021, the Commission issued a second Notice of Comment. The Department of Commerce ("Department") filed Supplemental Comments in response to this second Notice of Comment on July 21, 2021, and CenterPoint Energy filed its response on July 26, 2021.

CenterPoint Energy respectfully submits these Reply Comments to the Department's Supplemental Comments. As is relevant to CenterPoint Energy, the Department recommended:

1. Accept the natural gas utilities' 2020 Gas Affordability Program ("GAP") Reports;
2. In the future annual GAP reports to be filed in March of 2022, require each utility to report on their observations of any unusual GAP enrollment trends that could be caused by pandemic-related factors;
3. Approve CenterPoint Energy's request to increase its surcharge rate to \$0.00264 per therm from \$0.00236 per therm;
4. Approve CenterPoint Energy's proposal to reduce the payment requirement from 6% to 3% of its participating customers' income;
5. Approve CenterPoint Energy's proposal to remove the spending cap for its GAP program; and
6. Require CenterPoint Energy to discuss whether or not to reimplement the spending cap in future GAP filings, until such time as the spending cap is put back into place.

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The Company appreciates the Department's review of its filings in this docket and agrees with Department recommendations 1-4. With respect to Department recommendation 5, in our Supplemental Comments filed on July 26, 2021, in this Docket, the Company withdrew its request to eliminate the GAP spending cap and instead proposed to increase it from \$5 million to \$7 million dollars, with the understanding that an increase rather than an elimination of the cap is more agreeable to Energy Cents Coalition. With respect to Department recommendation 6, if the Commission approves an increase in the cap to \$7 million, the Company has no concerns with discussing whether the cap should revert to \$5 million in future annual GAP filings.

Please feel free to contact me at 612-321-4334 or [erica.larson@centerpointenergy.com](mailto:erica.larson@centerpointenergy.com) with any questions.

Sincerely,

/s/

Erica Larson  
Counsel, CenterPoint Energy

c: Service List

**CERTIFICATE OF SERVICE**

Melodee Carlson Chang certifies that she served the attached Reply Comments of CenterPoint Energy in Docket No. G-008/M-21-218 to all persons on the attached service list by having the document delivered via electronic filing.

/s/

\_\_\_\_\_  
Melodee Carlson Chang  
Senior Regulatory Paralegal  
CenterPoint Energy Minnesota Gas

**Service List Member Information**
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