COMMERCE DEPARTMENT

September 17, 2025

Sasha Bergman
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce
Docket No. G008/D-25-286

Dear Ms. Bergman:

Attached are the comments of the Minnesota Department of Commerce (Department) in the following matter:

Annual Depreciation Study Filing, 2025

The Petition was filed by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas on July 22, 2025.

The Department recommends **approval** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

AU/CA/ad
Attachment

COMMERCE DEPARTMENT

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. G008/D-25-286

I. INTRODUCTION

On July 22, 2025, CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas (CenterPoint, CPE or the Company) filed a petition (Petition) with the Minnesota Public Utilities Commission (Commission). The Petition is submitted in accordance with the Commission's December 5, 2019, Order in Docket No. G008/D-19-307 (the 2019 Depreciation Docket). The Order requires the Company to file an annual depreciation review by July 15 of each year due to the Company's change in depreciation method from the whole life basis to the remaining life basis. CPE's Petition is an annual update to its most recent comprehensive five-year depreciation study, filed in Docket No. G008/D-23-433 (the 2023 Depreciation Docket). In its Petition, the Company calculated updated remaining lives and depreciation rates. However, the Company is not proposing to change any existing depreciation rates and instead is proposing to retain the depreciation rates approved in the 2023 Depreciation Docket. The Company is also requesting a new due date of July 25 for all future annual depreciation study reviews.

As indicated in Exhibit 2B to CPE's Petition, the application of the updated depreciation rates to plant and reserve balances as of December 31, 2024, would result in estimated 2025 annual depreciation expense of $149,982,094. The Company calculates this to be an increase of $25,452,792, or 20 percent higher than depreciation expense would be under current depreciation rates.[1] As discussed below, however, the Company's estimate incorrectly included the effect of plant additions during 2023 and 2024, which were significant. As a result, its estimate of the change in depreciation expense is significantly overstated.

The Department examined CPE's Petition for compliance with filing requirements and previous Commission Orders, as well as for the reasonableness of the Company's proposal to retain the depreciation rates approved in the 2023 Depreciation Docket (*i.e.*, to not implement the updated depreciation rates derived in Appendix 2A of its Petition), and provides its analysis of CPE's Petition below.

[1] Petition, Exhibit 2B and Department Attachment 1 at 9.

II. PROCEDURAL BACKGROUND

April 16, 2024	The Commission approved CPE's last five-year comprehensive depreciation filing in Docket No. G008/D-23-433. CenterPoint's next five-year comprehensive depreciation filing is due September 29, 2028.
July 22, 2025	CPE filed a petition for approval of its 2025 Annual Depreciation Study.

III. DEPARTMENT ANALYSIS

The Department examined CPE's Petition for compliance with filing requirements and previous Commission Orders, as well as for the reasonableness of the proposed remaining lives, salvage rates, and depreciation rates.

A. DEPRECIATION BACKGROUND

For utility rate regulation purposes, depreciation accounting is a process of allocation, not of valuation, whose goal is to distribute the cost of capital assets, less net salvage, over the useful life in a systematic and rational manner.[2]

A depreciation system combines three elements that determine the depreciation rate: a method, a procedure, and a technique. The method determines how the asset, or group of assets will depreciate over time. For example, under the straight-line (SL) method, an asset is depreciated equally over its probable service life,[3] or the period of time extending from the date of the asset's initial installation to the forecasted date when it will be retired from service.[4] The procedure determines the level of grouping or sub-grouping of the assets. For example, in a vintage group (VG) procedure, property similar in characteristics and placed in service during the same year is treated as a distinct group that is depreciated as a whole. The depreciation technique is an additional aspect of the depreciation process. It informs the measure of the asset's service life the company uses to calculate the deprecation rate. Utilities may choose to apply an average service life (ASL) or remaining life (RL) technique.

When utilities use the ASL technique to depreciate group property, the life and salvage factors, as well as the resulting depreciation rates, remain unchanged between studies. For companies using the RL technique to determine the depreciable (useful) lives of their capital assets, depreciation rates will change as a result of the passage of time and the impact of plant activity, such as additions and retirements on remaining lives.

[2] Minn. R. 7825.0500 subp. 7 (2025).
[3] Minn. R. 7825.0500 subp. 14 (2025).
[4] Minn. R. 7825.0500 subp. 10 (2025).

B. COMPLIANCE WITH FILING REQUIREMENTS AND PRIOR COMMISSION ORDERS

B.1. Compliance with Minnesota Rules

Minnesota Rules, parts 7825.0500-7825.0900 require public utilities to seek Commission certification of their depreciation rates and methods. Utilities must use SL depreciation unless the utility can justify a different method as reasonable and proper. Additionally, utilities must review their depreciation rates annually to determine if they are generally appropriate and must file comprehensive depreciation studies at least once every five years. Once certified by order, depreciation rates remain in effect until the next certification. CenterPoint's next five-year comprehensive depreciation filing is due September 29, 2028.

CPE employs a SL depreciation method and files annual reviews with the Commission and thus satisfies these requirements. Additionally, CPE used the depreciation rates approved in the 2023 Depreciation Docket to calculate 2024 depreciation expense.

Minn. R. 7825.0700 requires utilities to list any major future additions or retirements that the utility believes may have a material impact on the current study. In response to an information request, the Company noted the accelerated replacement of Intelis meters and new asset classes for geothermal network as activity that may have a material impact on its current depreciation rates.[5] The Department will continue to monitor plant activity in Account 381.10 Meters – Intelis, and will review any proposals CenterPoint makes to geothermal network plant when it makes them in the future.

The Department reviewed CPE's compliance with Minnesota Rules and finds them in compliance with Minnesota Rules, parts 7825.0500-7825.0900.

B.2. Compliance with Prior Commission Order in Docket No. G008/D-23-433

The Commission's April 16, 2024, Order (April Order) in Docket No. G008/D-23-433 (the 2023 Depreciation Docket) required CPE to retain the probable retirement date of December 2036 for Underground Storage Plant accounts that was approved in Docket No. G008/D-19-307. The Department reviewed CPE's Petition and concluded the Company complied with this requirement for the current proposal. However, Exhibit 2B of the Petition reflects a currently approved probable retirement date of December 2046 for Underground Storage Plant.[6] Though not affecting the current proposal, the Department requested from the Company a revised Exhibit 2B, along with updates to any additional Petition schedules based on this correction, which Company provided.[7] Therefore, the Department concludes the Company complied with this requirement.

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[5] Department Attachment 2.
[6] Petition, Exhibit 2B, pg. 1.
[7] Department Attachment 1.

C. REASONABLENESS OF THE DEPRECIATION RATES APPROVED IN THE 2023 DEPRECIATION DOCKET

As noted above, the Company did not propose to update its depreciation rates, and instead is effectively proposing to retain the currently effective depreciation rates approved in the 2023 Depreciation Docket. Minnesota Rules, part 7825.0600 requires utilities to review their depreciation rates annually to determine if they are generally appropriate. Thus, the Company's proposal to retain its currently effective depreciation rates is reasonable if its current depreciation rates are still generally appropriate.

As the Department has explained in prior comments, under a remaining life depreciation technique, depreciation rates change slightly each year as a result of the passage of time and plant activity. Generally, a plant account's remaining life is a function of its average service life, assumed survivor curve, and the age of property in the account, which is tracked by vintage. Thus, even when an account's assumed average service life does not change, plant additions can lengthen the account's remaining life, as the new property will be expected to survive longer than older property in the account. Similarly, retirements of older property in an account can also lengthen the account's remaining life, as the weighted average age of the property in the account would decrease. Barring any changes in the age-makeup of property in an account, its remaining life would be expected to decrease by approximately one year from one depreciation study to the next if the account's average service life does not change.

In its Petition, CPE calculated and presented updated remaining lives and depreciation rates that reflect the passage of time as well as plant activity (additions, retirements, transfers, etc.) in its accounts through the end of 2024.[8] As a result, CPE's updated depreciation rates are different than those approved in the 2023 Depreciation Docket, but only by a small amount, as expected. The Department's estimates of CPE's present and updated accrual rates and depreciation expense is summarized in the following table:

[8] Petition, Exhibit 1, pg. III-3 and Department Attachment 1, at 7-9.

Table 1: Department Comparison of CenterPoint's Current and Updated Rates and Accruals [9]

	Accrual Rate				2025 Annualized Accrual		
Plant Group	**Updated**	**Present**	**Difference**		**Updated**	**Present**	**Difference**
Intangible Plant	2.50%	2.13%	0.37%		$ 843,185	$ 719,349	$ 123,836
Production Plant	3.41%	2.90%	0.51%		$ 1,345,253	$ 1,142,054	$ 203,199
Underground Storage Plant	2.49%	2.26%	0.23%		$ 658,982	$ 597,274	$ 61,678
Other Storage Plant	2.84%	2.54%	0.30%		$ 715,343	$ 639,646	$ 75,697
Distribution Plant	3.17%	3.18%	-0.01%		$ 113,124,618	$ 113,451,707	$(327,089)
General Plant	7.12%	6.83%	0.29%		$ 33,294,743	$ 31,954,256	$ 1,340,487
Total Depreciable Plant	**3.60%**	**3.57%**	**0.03%**		**$ 149,982,094**	**$ 148,504,286**	**$ 1,477,808**

As shown, the Department estimates that if implemented, the updated depreciation rates would increase CenterPoint's annual depreciation expense by approximately $1.5 million, or one percent. The Department notes CenterPoint's estimate of the impact of its updated depreciation rates is significantly larger: $25.7 million per year, or 20 percent.[10] However, as noted above, the Department concludes that this is a significant overestimate, for two main reasons. First, CPE's estimate of depreciation expense under approved rates is based in part on incorrect rates for its underground storage plant account. Specifically, Exhibit 2B of the Petition reflects a probable retirement date of December 2046 for these accounts, which is the retirement date the Company initially proposed in Docket No. G008/D-23-433. However, in the April Order, the Commission required the Company to retain the probable retirement date of December 2036 for Underground Storage Plant accounts approved in Docket No. G008/D-19-307.

Second, for all accounts other than those in Underground Storage Plant, the data in the "CURRENTLY APPROVED" columns of Exhibit 2B used to calculate that increase appear to be identical to the "PROPOSED" columns from the "Comparison" Schedule of Exhibit 3 of the Company's Petition in Docket No. G008/D-23-433.[11] As a result, the accruals under current rates presented in the Petition are based on applying approved depreciation rates to gross plant balances as of December 31, 2022. The Company's total depreciable plant increased by nearly $600 million, or 17 percent in the subsequent two years.[12] Thus, the overwhelming majority of the Company's estimated $25.7 million increase in depreciation expense is attributable to this significant growth in depreciable plant, not changes in the updated depreciation rates.

In the calculations summarized in Table, the Department corrected both of these errors.

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[9] Department Attachment 3. This schedule is a revised version of Exhibit 2B of the Petition, modified to reflect the depreciation rates approved in the 2023 Depreciation Docket for Underground Storage Plant, and to calculate accruals under current rates using December 31, 2024 gross plant balances.
[10] Petition, Ex. 2B at 3.
[11] *Petition of CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota, Gas for Approval of Depreciation Certification,* CenterPoint Energy, Initial Filing, September 29, 2023, Docket No. G008/D-23-433, (eDockets) 20239-199259-04.
[12] Compare the reported total depreciable plant balances in the Company's Petition, Exhibit 2B, in the 2023 Depreciation Docket ($3,562,273,762) and its Petition, Exhibit 2B, in the instant Docket ($4,160,766,600).

Ultimately, based on its revised calculations, the Department concludes that the small difference in depreciation expense under current versus updated depreciation rates indicates that the Company's current depreciation rates, approved in the 2023 Depreciation Docket, are still generally appropriate, as required by Minnesota Rules. Based on this, the Department concludes that the Company's proposal to retain its current depreciation rates is reasonable.

D. ANNUAL DEPRECIATION STUDY FILING DUE DATE

The Commission's December 5, 2019, Order in Docket No. G008/D-19-307 (the 2019 Depreciation Docket) requires the Company to file an annual depreciation review by July 15 of each year. In the Petition, CPE is requesting a new due date of July 25 for all future annual depreciation study reviews.[13]

The Department has no objection and therefore concludes that moving the due date of CPE's annual depreciation review from July 15 to July 25 is reasonable.

IV. DEPARTMENT RECOMMENDATIONS

Based on its review, the Department recommends that the Commission:

- Accept the CenterPoint's annual depreciation review;
- Require CenterPoint to file its next annual depreciation review by July 25, 2026;
- Require CenterPoint to file its next five-year depreciation study by September 29, 2028;
- Require CenterPoint, if it files a rate case within one year of the due date of its next comprehensive five-year depreciation Study filing date (September 29, 2028), to coordinate the filing of the comprehensive depreciation study with the rate case; either by filing the rate case with the depreciation rates proposed in the comprehensive depreciation study, or by updating the depreciation expense calculation in the rate case by using the depreciation study's proposed rates when they are known.

The Department emphasizes that the Commission's determination in depreciation proceedings are for accounting purposes only and are not a determination for purposes of rates.

[13] Petition, at 1.

Attachments

State of Minnesota
Minnesota Department of Commerce

Utility Information Request

Docket Number: G-008/D-25-286 - 2025 Annual Depreciation Study	Date of Request: 7/30/2025
Requested From: CENTERPOINT ENERGY MINNESOTA GAS	Response Due: 8/11/2025

Analyst Requesting Information: Ashley Uphus, Craig Addonizio

Type of Inquiry: Financial

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
DOC 004	Topic: Estimated increase in accrual resulting from proposed depreciation rates Reference(s): Cover Letter at 1 **Request:** In the cover letter to its Petition, CenterPoint stated its proposed depreciation rates will result in an increase in its annual accrual of $25.7 million. However, the data in the "CURRENTLY APPROVED" columns of Exhibit 2B used to calculate that increase appear to be identical to the "PROPOSED" columns from the "Comparison" Schedule of Exhibit 3 of the Company's Petition in Docket No. G008/D-23-433. As a result, the $25.7 million increase calculated in Exhibit 2B of the current Petition is largely the result of increases in gross plant balances since December 31, 2022, and only partially a result of proposed changes in depreciation rates. Relatedly, for the Company's Underground Storage Plant Accounts, the "CURRENTLY APPROVED" columns incorrectly reflect a probable retirement year 2046, rather than 2036, as was approved by the Commission. A. Please provide, in a working Microsoft Excel file, a revised Exhibit 2B to calculate the accrual under currently approved rates as the product of (a) current depreciation rates as approved by the Commission in Docket No. G008/D-23-433 (as opposed to the rates initially proposed by the Company) and (b) gross plant balances as of December 31, 2024 (as opposed to plant balances as of December 31, 2022). B. Please provide, in working Microsoft Excel files, revised versions of any other schedules or exhibits that are affected by the changes made in

Response By: Jessica Barnard
Title: Analyst, Regulatory & Rates
Department: Regulatory Portfolio Management MN
Telephone: 612-861-8415

response to part A of this information request.

Response:

A. Including the working Microsoft Excel file of the revised Exhibit 2B that included currently approved depreciation rates and gross plant balances as of December 31, 2024.

B. There are not any revised versions of other schedules or exhibits that were affected by the changes made to Exhibit 2B.

Response By: Jessica Barnard
Title: Analyst, Regulatory & Rates
Department: Regulatory Portfolio Management MN
Telephone: 612-861-8415

CENTERPOINT ENERGY MINNESOTA GAS

TABLE 1: SUMMARY OF ESTIMATED SURVIVOR CURVE, NET SALVAGE PERCENT, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO GAS PLANT AS OF DECEMBER 31, 2024

								CALCULATED ANNUAL		
	ACCOUNT	PROBABLE RETIREMENT DATE	SURVIVOR CURVE	NET SALVAGE PERCENT	ORIGINAL COST AS OF DECEMBER 31, 2024	BOOK DEPRECIATION RESERVE	FUTURE ACCRUALS	ACCRUAL AMOUNT	ACCRUAL RATE	COMPOSITE REMAINING LIFE
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)=(8)/(5)	(10)=(7)/(8)
INTANGIBLE PLANT										
303.00	MISCELLANEOUS INTANGIBLE PLANT		41-SQ	0	33,772,254.59	1,065,925	32,706,330	843,185	2.50	38.8
	TOTAL INTANGIBLE PLANT				**33,772,254.59**	**1,065,925**	**32,706,330**	**843,185**	**2.50**	
PRODUCTION PLANT										
305.00	STRUCTURES AND IMPROVEMENTS									
	LAKE GENEVA	12-2045	85-S0.5	(50)	127,175.23	155,620	35,143	1,779	1.40	19.8
	RUM RIVER	12-2061	85-S0.5	(50)	695,541.93	443,837	599,476	17,571	2.53	34.1
	DAKOTA STATION	12-2041	85-S0.5	(50)	1,454,147.94	1,058,752	1,122,470	66,914	4.60	16.8
	GOLDEN VALLEY	12-2047	85-S0.5	(50)	357,895.10	279,369	257,474	11,483	3.21	22.4
	MANKATO	12-2047	85-S0.5	(50)	732,766.57	395,479	703,671	31,433	4.29	22.4
	NORTH MINNEAPOLIS	12-2037	85-S0.5	(50)	779,264.97	398,373	770,524	59,731	7.67	12.9
	RIVER PLANT	12-2043	85-S0.5	(50)	1,064,448.14	689,082	907,590	48,534	4.56	18.7
	SOUTH MINNEAPOLIS	12-2037	85-S0.5	(50)	357,600.71	209,251	327,150	25,357	7.09	12.9
	TOTAL STRUCTURES AND IMPROVEMENTS				5,568,840.59	3,629,763	4,723,498	262,802	4.72	
311.00	LIQUEFIED PETROLEUM GAS EQUIPMENT									
	LAKE GENEVA	12-2045	65-S1	(25)	884,040.01	721,422	383,628	18,879	2.14	20.3
	RUM RIVER	12-2061	65-S1	(25)	2,535,748.33	1,475,881	1,693,804	52,038	2.05	32.5
	DAKOTA STATION	12-2041	65-S1	(25)	9,192,264.21	6,527,309	4,963,021	295,617	3.22	16.8
	GOLDEN VALLEY	12-2047	65-S1	(25)	4,983,767.06	2,802,941	3,426,768	153,184	3.07	22.4
	MANKATO	12-2047	65-S1	(25)	3,023,024.12	2,086,685	1,692,095	75,917	2.51	22.3
	NORTH MINNEAPOLIS	12-2037	65-S1	(25)	2,267,993.69	1,805,528	1,029,464	79,631	3.51	12.9
	RIVER PLANT	12-2043	65-S1	(25)	2,759,864.75	2,386,129	1,063,702	57,692	2.09	18.4
	SOUTH MINNEAPOLIS	12-2037	65-S1	(25)	1,489,177.04	1,842,213	19,258	1,493	0.10	12.9
	TOTAL LIQUEFIED PETROLEUM GAS EQUIPMENT				27,135,879.21	19,648,108	14,271,740	734,451	2.71	
320.00	OTHER EQUIPMENT									
	LAKE GENEVA	12-2045	30-S0.5	0	78,403.11	25,377	53,026	3,166	4.04	16.7
	RUM RIVER	12-2061	30-S0.5	0	365,149.52	87,679	277,471	12,348	3.38	22.5
	DAKOTA STATION	12-2041	30-S0.5	0	478,659.88	156,139	322,521	22,186	4.64	14.5
	GOLDEN VALLEY	12-2047	30-S0.5	0	672,935.45	157,802	515,134	27,916	4.15	18.5
	MANKATO	12-2047	30-S0.5	0	198,716.27	57,097	141,619	7,929	3.99	17.9
	NORTH MINNEAPOLIS	12-2037	30-S0.5	0	535,283.07	220,181	315,102	27,313	5.10	11.5
	RIVER PLANT	12-2043	30-S0.5	0	441,067.55	130,162	310,906	19,532	4.43	15.9
	SOUTH MINNEAPOLIS	12-2037	30-S0.5	0	328,348.27	170,857	157,491	14,437	4.40	10.9
	TOTAL OTHER EQUIPMENT				3,098,563.12	1,005,294	2,093,270	134,827	4.35	
320.20	OTHER EQUIPMENT - ELECTROLYZER EQUIPMENT		17-R3	0	3,618,208.86	514,406	3,103,803	213,173	5.89	14.6
	TOTAL PRODUCTION PLANT				**39,421,491.78**	**24,797,570**	**24,192,311**	**1,345,253**	**3.41**	
UNDERGROUND STORAGE PLANT										
350.20	RIGHTS-OF-WAY	12-2036	SQUARE	(20)	50,176.36	48,692	11,520	959	1.91	12.0
351.00	STRUCTURES AND IMPROVEMENTS	12-2036	60-S1.5	(20)	2,062,748.98	1,462,209	1,013,089	86,879	4.21	11.7
352.00	WELLS	12-2036	50-R3	(20)	4,711,725.83	4,923,410	730,661	63,178	1.34	11.6
352.10	STORAGE LEASEHOLDS AND RIGHTS	12-2036	SQUARE	(20)	368,171.86	382,070	59,736	4,978	1.35	12.0
352.20	RESERVOIRS	12-2036	50-R2	(20)	1,737,606.13	1,933,789	151,339	17,280	0.99	8.8
352.30	NONRECOVERABLE NATURAL GAS	12-2036	SQUARE	(20)	4,933,397.05	5,927,802	(7,726)	0	-	-
353.00	LINES	12-2036	50-R3	(20)	7,030,779.84	5,231,746	3,205,190	271,939	3.87	11.8
354.00	COMPRESSOR STATION EQUIPMENT	12-2036	50-R3	(20)	3,824,846.45	3,155,742	1,434,074	122,326	3.20	11.7
355.00	MEASURING AND REGULATING EQUIPMENT	12-2036	40-R2	(20)	359,459.59	77,131	354,221	30,312	8.43	11.7
356.00	PURIFICATION EQUIPMENT	12-2036	40-R2	(20)	1,131,789.98	892,960	465,188	42,768	3.78	10.9
357.00	OTHER EQUIPMENT	12-2036	30-S0.5	(20)	242,110.17	106,502	184,031	18,333	7.57	10.0
	TOTAL UNDERGROUND STORAGE PLANT				**26,452,812.24**	**24,142,052**	**7,601,323**	**658,952**	**2.49**	
OTHER STORAGE PLANT										

CENTERPOINT ENERGY MINNESOTA GAS

TABLE 1: SUMMARY OF ESTIMATED SURVIVOR CURVE, NET SALVAGE PERCENT, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO GAS PLANT AS OF DECEMBER 31, 2024

	ACCOUNT	PROBABLE RETIREMENT DATE	SURVIVOR CURVE	NET SALVAGE PERCENT	ORIGINAL COST AS OF DECEMBER 31, 2024	BOOK DEPRECIATION RESERVE	FUTURE ACCRUALS	CALCULATED ANNUAL ACCRUAL AMOUNT	CALCULATED ANNUAL ACCRUAL RATE	COMPOSITE REMAINING LIFE
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)=(8)/(5)	(10)=(7)/(8)
361.00	STRUCTURES AND IMPROVEMENTS	12-2041	60-S2.5	(20)	3,540,243.58	2,337,760	1,910,533	115,745	3.27	16.5
362.00	GAS HOLDERS	12-2041	55-R3	(20)	4,468,532.45	4,986,829	375,410	24,467	0.55	15.3
363.00	PURIFICATION EQUIPMENT	12-2041	40-R2	(10)	809,677.71	870,239	20,407	2,551	0.32	8.0
363.10	LIQUEFACTION EQUIPMENT	12-2041	50-R3	(10)	4,726,688.50	4,655,535	543,823	35,537	0.75	15.3
363.20	VAPORIZING EQUIPMENT	12-2041	50-R2.5	(10)	2,184,091.73	2,112,037	290,464	17,588	0.81	16.5
363.30	COMPRESSOR STATION EQUIPMENT	12-2041	40-R2	(10)	4,972,056.88	548,525	4,920,737	301,650	6.07	16.3
363.40	MEASURING AND REGULATING EQUIPMENT	12-2041	50-R2.5	(10)	2,574,257.02	440,791	2,390,892	146,879	5.71	16.3
363.50	OTHER EQUIPMENT	12-2041	40-S2.5	(10)	1,875,493.95	891,235	1,171,808	70,926	3.78	16.5
	TOTAL OTHER STORAGE PLANT				**25,151,041.82**	**16,842,951**	**11,624,074**	**715,343**	**2.84**	
DISTRIBUTION PLANT										
375.00	STRUCTURES AND IMPROVEMENTS		50-R1.5	(25)	4,760,235.24	852,011	5,098,283	122,013	2.56	41.8
	MAINS									
376.10	STEEL		52-R3	(40)	1,180,911,947.85	253,333,350	1,399,943,377	33,317,234	2.82	42.0
376.30	PLASTIC		47-R3	(40)	1,022,253,008.71	321,065,230	1,110,088,982	29,741,758	2.91	37.3
	TOTAL MAINS				2,203,164,956.56	574,398,580	2,510,032,359	63,058,992	2.86	
378.00	MEASURING AND REGULATING STATION EQUIPMENT		36-R1	(15)	79,032,815.42	11,168,486	79,719,252	2,835,344	3.59	28.1
	SERVICES									
380.10	METALLIC		42-R1	(75)	19,534,671.98	17,701,974	16,483,702	735,071	3.76	22.4
380.20	PLASTIC		44-R3	(75)	915,012,912.90	457,538,225	1,143,734,373	33,961,569	3.71	33.7
	TOTAL SERVICES				934,547,584.88	475,240,198	1,160,218,075	34,696,640	3.71	
381.05	METERS - SMALL		25-S1	18	55,830,472.88	24,914,451	20,866,537	1,555,168	2.79	13.4
381.06	METERS - LARGE		30-R3	0	29,981,254.65	11,576,274	18,404,980	1,086,482	3.62	16.9
381.10	METERS - INTELIS		20-S2.5	(1)	22,972,701.94	2,161,869	21,040,560	1,141,057	4.97	18.4
382.00	METER INSTALLATIONS		50-R4	(60)	178,153,442.78	82,806,861	202,238,647	5,708,943	3.20	35.4
385.00	INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT		25-R3	(15)	59,745,611.51	20,668,916	48,038,537	2,919,979	4.89	16.5
386.10	OTHER PROPERTY ON CUSTOMERS' PREMISES		15-S2.5	(10)	17,625.91	19,389	0	0	-	-
	TOTAL DISTRIBUTION PLANT				**3,568,206,701.77**	**1,203,807,036**	**4,065,657,230**	**113,124,618**	**3.17**	
GENERAL PLANT										
390.10	STRUCTURES AND IMPROVEMENTS									
	GOLDEN VALLEY	12-2056	60-S0.5	(10)	11,838,504.77	2,375,725	10,646,631	367,920	3.11	28.9
	MANKATO	12-2047	60-S0.5	(10)	3,073,223.74	727,714	2,652,832	123,268	4.01	21.5
	NORTH MINNEAPOLIS	12-2037	60-S0.5	(10)	27,753.59	10,428	20,101	1,589	5.73	12.7
	RIVER PLANT	12-2043	60-S0.5	(10)	2,024,671.08	762,039	1,465,099	82,241	4.06	17.8
	SOUTH MINNEAPOLIS	12-2037	60-S0.5	(10)	10,109,552.71	4,098,739	7,021,769	560,345	5.54	12.5
	COON RAPIDS		FULLY ACCRUED		1,810,509.27	1,810,509	0	0	-	-
	LINDEN	12-2036	60-S0.5	(10)	10,264,857.57	4,353,254	6,938,089	602,740	5.87	11.5
	WILLMAR	12-2032	60-S0.5	(10)	498,933.29	178,057	370,770	47,071	9.43	7.9
	LIVONIA		FULLY ACCRUED		32,810.00	32,810	0	0	-	-
	SUBTOTAL ACCOUNT 390.10				39,680,816.02	14,349,275	29,115,291	1,785,174	4.50	
	NICOLLET MALL	12-2065	60-S0.5	10	68,104,126.84	5,094,896	56,198,818	1,540,069	2.26	36.5
	TOTAL STRUCTURES AND IMPROVEMENTS				107,784,942.86	19,444,171	85,314,109	3,325,243	3.09	
391.00	OFFICE FURNITURE AND EQUIPMENT									
	OFFICE FURNITURE		20-SQ	0	8,457,342.39	945,392	7,511,951	422,867	5.00	18.0
	OFFICE EQUIPMENT		20-SQ	0	6,126,821.85	1,483,549	4,643,273	306,341	5.00	15.5
	COMPUTER HARDWARE									
	FULLY ACCRUED		FULLY ACCRUED		625,781.59	625,782	0	0	-	-
	AMORTIZED		5-SQ	0	36,904,752.75	18,139,326	18,765,426	7,380,951	20.00	2.3
	TOTAL COMPUTER HARDWARE				37,530,534.34	18,765,108	18,765,426	7,380,951	19.67	

CENTERPOINT ENERGY MINNESOTA GAS

TABLE 1: SUMMARY OF ESTIMATED SURVIVOR CURVE, NET SALVAGE PERCENT, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO GAS PLANT AS OF DECEMBER 31, 2024

	ACCOUNT	PROBABLE RETIREMENT DATE	SURVIVOR CURVE	NET SALVAGE PERCENT	ORIGINAL COST AS OF DECEMBER 31, 2024	BOOK DEPRECIATION RESERVE	FUTURE ACCRUALS	CALCULATED ANNUAL ACCRUAL AMOUNT	CALCULATED ANNUAL ACCRUAL RATE	COMPOSITE REMAINING LIFE
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)=(8)/(5)	(10)=(7)/(8)
	COMPUTER SOFTWARE - 3-YEAR									
	FULLY ACCRUED		FULLY ACCRUED		28,726.44	28,726	0	0	-	-
	AMORTIZED		3-SQ	0	5,860,676.63	744,261	5,116,416	1,953,364	33.33	2.5
	TOTAL COMPUTER SOFTWARE - 3-YEAR				5,889,403.07	772,987	5,116,416	1,953,364	33.17	
	COMPUTER SOFTWARE - 5-YEAR									
	FULLY ACCRUED		FULLY ACCRUED		45,694,820.55	45,694,821	0	0	-	-
	AMORTIZED		5-SQ	0	26,803,133.18	5,013,400	21,789,733	5,360,627	20.00	2.1
	TOTAL COMPUTER SOFTWARE - 5-YEAR				72,497,953.73	50,708,221	21,789,733	5,360,627	7.39	
	COMPUTER SOFTWARE - 10-YEAR									
	FULLY ACCRUED		FULLY ACCRUED		8,879,153.24	8,879,153	0	0	-	-
	AMORTIZED		10-SQ	0	51,430,923.83	1,722,944	49,707,980	5,143,092	10.00	5.4
	TOTAL COMPUTER SOFTWARE - 10-YEAR				60,310,077.07	10,602,097	49,707,980	5,143,092	8.53	
	COMPUTER SOFTWARE - 15-YEAR		15-SQ	0	20,003,027.81	458,424	19,544,604	1,334,202	6.67	11.5
	TOTAL COMPUTER SOFTWARE				158,700,461.68	62,541,729	96,158,733	13,791,285	8.69	
	TOTAL OFFICE FURNITURE AND EQUIPMENT				210,815,160.26	83,735,778	127,079,383	21,901,444	10.39	
392.00	TRANSPORTATION EQUIPMENT		9-R1.5	15	47,756,585.80	14,599,175	25,993,923	4,204,112	8.80	6.2
393.00	STORES EQUIPMENT		15-SQ	0	310,188.88	79,724	230,465	20,690	6.67	11.4
394.00	TOOLS, SHOP AND GARAGE EQUIPMENT		25-SQ	0	22,970,306.72	5,805,299	17,165,008	918,812	4.00	19.1
395.00	LABORATORY EQUIPMENT		25-SQ	0	93,954.96	31,279	62,676	3,758	4.00	17.7
396.00	POWER OPERATED EQUIPMENT		15-R2	10	15,330,184.10	5,893,779	7,903,387	706,113	4.61	11.2
397.10	COMMUNICATION EQUIPMENT		15-SQ	0	2,096,197.01	458,856	1,637,341	139,816	6.67	13.4
397.11	COMMUNICATION EQUIPMENT - CELL PHONES		3-SQ	0	301,749.74	128,074	173,676	100,573	33.33	-
397.20	COMMUNICATION EQUIPMENT - METER READING		12-R2.5	(5)	2,492,576.08	2,130,144	487,061	43,080	1.73	11.3
397.21	COMMUNICATION EQUIPMENT - ERTS		12-R2.5	(5)	54,474,009.01	46,404,511	10,793,198	1,883,874	3.46	5.7
398.10	MISCELLANEOUS EQUIPMENT									
	FULLY ACCRUED		FULLY ACCRUED		98,712.26	98,712	0	0	-	-
	AMORTIZED		15-SQ	0	179,726.76	30,187	149,540	11,988	6.67	4.6
	TOTAL MISCELLANEOUS EQUIPMENT				278,439.02	128,899	149,540	11,988	4.31	
398.50	WATER TREATMENT									
	RIVER PLANT	12-2043	SQUARE	(15)	2,386,149.48	2,190,042	554,030	29,158	1.22	19.0
	WATERVILLE	12-2036	SQAURE	(15)	671,854.26	699,642	72,990	6,082	0.91	12.0
	TOTAL WATER TREATMENT				3,058,003.74	2,889,684	627,020	35,240	1.15	
	TOTAL GENERAL PLANT				**467,762,298.18**	**181,729,372**	**277,616,787**	**33,294,743**	**7.12**	
	TOTAL DEPRECIABLE PLANT				**4,160,766,600.38**	**1,452,384,906**	**4,419,398,055**	**149,982,094**	**3.60**	
NONDEPRECIABLE PLANT AND ACCOUNTS NOT STUDIED										
304.00	LAND				1,247,182.54					
305.00	STRUCTURES AND IMPROVEMENTS - BLAINE				34,426.56	34,427				
305.00	STRUCTURES AND IMPROVEMENTS - BUFFALO				13,126.40	13,126				
350.10	LAND				34,307.34					
374.00	LAND				5,073,443.24					
389.00	LAND				11,859,995.22					
390.10	STRUCTURES AND IMPROVEMENTS - LAKE GENEVA				485.67	486				
390.20	LEASEHOLD IMPROVEMENTS *				53,837.36	27,278				
	TOTAL NONDEPRECIABLE PLANT AND ACCOUNTS NOT STUDIED				**18,316,804.33**	**75,317**				
	TOTAL GAS PLANT				**4,179,083,404.71**	**1,452,460,222**				

CENTERPOINT ENERGY MINNESOTA GAS

TABLE 1: SUMMARY OF ESTIMATED SURVIVOR CURVE, NET SALVAGE PERCENT, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO GAS PLANT AS OF DECEMBER 31, 2024

ACCOUNT	PROBABLE RETIREMENT DATE	SURVIVOR CURVE	NET SALVAGE PERCENT	ORIGINAL COST AS OF DECEMBER 31, 2024	BOOK DEPRECIATION RESERVE	FUTURE ACCRUALS	CALCULATED ANNUAL ACCRUAL AMOUNT	CALCULATED ANNUAL ACCRUAL RATE	COMPOSITE REMAINING LIFE
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)=(8)/(5)	(10)=(7)/(8)

* LEASEHOLD IMPROVEMENTS ARE DEPRECIATED OVER THE LIFE OF THE LEASE.

CENTERPOINT ENERGY MINNESOTA GAS

COMPARISON OF CURRENT AND PROPOSED SURVIVOR CURVES, NET SALVAGE PERCENTS AND ANNUAL DEPRECIATION RATES AND ACCRUALS RELATED TO GAS PLANT AS OF DECEMBER 31, 2024

			CURRENTLY APPROVED					PROPOSED					
	ACCOUNT	ORIGINAL COST AS OF DECEMBER 31, 2024	PROBABLE RETIREMENT DATE	SURVIVOR CURVE	NET SALVAGE PERCENT	CALCULATED ANNUAL ACCRUAL AMOUNT	CALCULATED ANNUAL ACCRUAL RATE	PROBABLE RETIREMENT DATE	SURVIVOR CURVE	NET SALVAGE PERCENT	CALCULATED ANNUAL ACCRUAL AMOUNT	CALCULATED ANNUAL ACCRUAL RATE	INCREASE/ (DECREASE)
	(1)	(2)	(3)	(4)	(5)	(6)=(7)x(2)	(7)	(8)	(9)	(10)	(11)=(12)/(2)	(12)	(13)=(11)-(6)
INTANGIBLE PLANT													
303.00	MISCELLANEOUS INTANGIBLE PLANT	33,772,254.59		f	0	37,394	2.13		41-SQ	0	843,185	2.50	805,791
	TOTAL INTANGIBLE PLANT	**33,772,254.59**				**37,394**	**2.13**				**843,185**	**2.50**	**805,791**
PRODUCTION PLANT													
305.00	STRUCTURES AND IMPROVEMENTS												
	LAKE GENEVA	127,175.23	12-2045	85-S0.5	(50)	1,397	1.10	12-2045	85-S0.5	(50)	1,779	1.40	382
	RUM RIVER	695,541.93	12-2061	85-S0.5	(50)	15,757	2.37	12-2061	85-S0.5	(50)	17,571	2.53	1,814
	DAKOTA STATION	1,454,147.94	12-2041	85-S0.5	(50)	25,383	2.35	12-2041	85-S0.5	(50)	66,914	4.60	41,531
	GOLDEN VALLEY	357,895.10	12-2047	85-S0.5	(50)	10,993	3.04	12-2047	85-S0.5	(50)	11,483	3.21	490
	MANKATO	732,766.57	12-2047	85-S0.5	(50)	31,847	4.35	12-2047	85-S0.5	(50)	31,433	4.29	(414)
	NORTH MINNEAPOLIS	779,264.97	12-2037	85-S0.5	(50)	41,284	6.65	12-2037	85-S0.5	(50)	59,731	7.67	18,447
	RIVER PLANT	1,064,448.14	12-2043	85-S0.5	(50)	39,658	4.04	12-2043	85-S0.5	(50)	48,534	4.56	8,876
	SOUTH MINNEAPOLIS	357,600.71	12-2037	85-S0.5	(50)	35,914	7.40	12-2037	85-S0.5	(50)	25,357	7.09	(10,557)
	TOTAL STRUCTURES AND IMPROVEMENTS	5,568,840.59				202,233	4.00				262,802	4.72	60,569
311.00	LIQUEFIED PETROLEUM GAS EQUIPMENT												
	LAKE GENEVA	884,040.01	12-2045	65-S1	(25)	17,371	2.01	12-2045	65-S1	(25)	18,879	2.14	1,508
	RUM RIVER	2,535,748.33	12-2061	65-S1	(25)	43,884	1.88	12-2061	65-S1	(25)	52,038	2.05	8,154
	DAKOTA STATION	9,192,264.21	12-2041	65-S1	(25)	129,620	1.85	12-2041	65-S1	(25)	295,617	3.22	165,997
	GOLDEN VALLEY	4,983,767.06	12-2047	65-S1	(25)	155,879	3.10	12-2047	65-S1	(25)	153,184	3.07	(2,695)
	MANKATO	3,023,024.12	12-2047	65-S1	(25)	75,379	2.49	12-2047	65-S1	(25)	75,917	2.51	538
	NORTH MINNEAPOLIS	2,267,993.69	12-2037	65-S1	(25)	58,390	2.93	12-2037	65-S1	(25)	79,631	3.51	21,241
	RIVER PLANT	2,759,864.75	12-2043	65-S1	(25)	53,941	1.94	12-2043	65-S1	(25)	57,692	2.09	3,751
	SOUTH MINNEAPOLIS	1,489,177.04	12-2037	65-S1	(25)	12,094	0.73	12-2037	65-S1	(25)	1,493	0.10	(10,601)
	TOTAL LIQUEFIED PETROLEUM GAS EQUIPMENT	27,135,879.21				546,558	2.22				734,451	2.71	187,893
320.00	OTHER EQUIPMENT												
	LAKE GENEVA	78,403.11	12-2045	30-S0.5	0	2,915	3.72	12-2045	30-S0.5	0	3,166	4.04	251
	RUM RIVER	365,149.52	12-2061	30-S0.5	0	11,645	3.19	12-2061	30-S0.5	0	12,348	3.38	703
	DAKOTA STATION	478,659.88	12-2041	30-S0.5	0	20,591	4.17	12-2041	30-S0.5	0	22,186	4.64	1,595
	GOLDEN VALLEY	672,935.45	12-2047	30-S0.5	0	14,799	3.20	12-2047	30-S0.5	0	27,916	4.15	13,117
	MANKATO	198,716.27	12-2047	30-S0.5	0	5,834	3.47	12-2047	30-S0.5	0	7,929	3.99	2,095
	NORTH MINNEAPOLIS	535,283.07	12-2037	30-S0.5	0	35,655	4.67	12-2037	30-S0.5	0	27,313	5.10	(8,342)
	RIVER PLANT	441,067.55	12-2043	30-S0.5	0	15,163	4.16	12-2043	30-S0.5	0	19,532	4.43	4,369
	SOUTH MINNEAPOLIS	328,348.27	12-2037	30-S0.5	0	7,801	2.95	12-2037	30-S0.5	0	14,437	4.40	6,636
	TOTAL OTHER EQUIPMENT	3,098,563.12				114,403	3.86				134,827	4.35	20,424
320.20	OTHER EQUIPMENT - ELECTROLYZER EQUIPMENT	3,618,208.86		17-R3	0	213,774	5.91		17-R3	0	213,173	5.89	(601)
	TOTAL PRODUCTION PLANT	**39,421,491.78**				**1,076,968**	**2.97**				**1,345,253**	**3.41**	**268,285**
UNDERGROUND STORAGE PLANT													
350.20	RIGHTS-OF-WAY	50,176.36	12-2036	SQUARE	(20)	950	1.89	12-2036	SQUARE	(20)	959	1.91	9
351.00	STRUCTURES AND IMPROVEMENTS	2,062,748.98	12-2036	60-S1.5	(20)	64,237	3.36	12-2036	60-S1.5	(20)	86,879	4.21	22,642
352.00	WELLS	4,711,725.83	12-2036	50-R3	(20)	38,201	0.83	12-2036	50-R3	(20)	63,178	1.34	24,977
352.10	STORAGE LEASEHOLDS AND RIGHTS	368,171.86	12-2036	SQUARE	(20)	4,961	1.35	12-2036	SQUARE	(20)	4,978	1.35	17
352.20	RESERVOIRS	1,737,606.13	12-2036	50-R2	(20)	19,373	1.11	12-2036	50-R2	(20)	17,280	0.99	(2,093)
352.30	NONRECOVERABLE NATURAL GAS	4,933,397.05	12-2036	SQUARE	(20)	0	-	12-2036	SQUARE	(20)	0	-	0
353.00	LINES	7,030,779.84	12-2036	50-R3	(20)	245,103	3.62	12-2036	50-R3	(20)	271,939	3.87	26,836
354.00	COMPRESSOR STATION EQUIPMENT	3,824,846.45	12-2036	50-R3	(20)	116,911	3.06	12-2036	50-R3	(20)	122,326	3.20	5,415
355.00	MEASURING AND REGULATING EQUIPMENT	359,459.59	12-2036	40-R2	(20)	29,290	8.25	12-2036	40-R2	(20)	30,312	8.43	1,022
356.00	PURIFICATION EQUIPMENT	1,131,789.98	12-2036	40-R2	(20)	43,331	3.84	12-2036	40-R2	(20)	42,768	3.78	(563)
357.00	OTHER EQUIPMENT	242,110.17	12-2036	30-S0.5	(20)	18,377	7.84	12-2036	30-S0.5	(20)	18,333	7.57	(44)
	TOTAL UNDERGROUND STORAGE PLANT	**26,452,812.24**				**580,734**	**2.24**				**658,952**	**2.49**	**78,218**
OTHER STORAGE PLANT													
361.00	STRUCTURES AND IMPROVEMENTS	3,540,243.58	12-2041	60-S2.5	(20)	103,523	2.96	12-2041	60-S2.5	(20)	115,745	3.27	12,222
362.00	GAS HOLDERS	4,468,532.45	12-2041	55-R3	(20)	23,355	0.52	12-2041	55-R3	(20)	24,467	0.55	1,112
363.00	PURIFICATION EQUIPMENT	809,677.71	12-2041	40-R2	(10)	3,356	0.41	12-2041	40-R2	(10)	2,551	0.32	(805)
363.10	LIQUEFACTION EQUIPMENT	4,726,688.50	12-2041	50-R3	(10)	30,547	0.65	12-2041	50-R3	(10)	35,537	0.75	4,990
363.20	VAPORIZING EQUIPMENT	2,184,091.73	12-2041	50-R2.5	(10)	15,923	0.73	12-2041	50-R2.5	(10)	17,588	0.81	1,665
363.30	COMPRESSOR STATION EQUIPMENT	4,972,056.88	12-2041	40-R2	(10)	286,858	5.77	12-2041	40-R2	(10)	301,650	6.07	14,792
363.40	MEASURING AND REGULATING EQUIPMENT	2,574,257.02	12-2041	50-R2.5	(10)	131,283	5.28	12-2041	50-R2.5	(10)	146,879	5.71	15,596
363.50	OTHER EQUIPMENT	1,875,493.95	12-2041	40-S2.5	(10)	33,479	2.07	12-2041	40-S2.5	(10)	70,926	3.78	37,447
	TOTAL OTHER STORAGE PLANT	**25,151,041.82**				**628,324**	**2.54**				**715,343**	**2.84**	**87,019**
DISTRIBUTION PLANT													
375.00	STRUCTURES AND IMPROVEMENTS	4,760,235.24		50-R1.5	(25)	97,857	2.58		50-R1.5	(25)	122,013	2.56	24,156
	MAINS												

CENTERPOINT ENERGY MINNESOTA GAS

**COMPARISON OF CURRENT AND PROPOSED SURVIVOR CURVES, NET SALVAGE PERCENTS AND
ANNUAL DEPRECIATION RATES AND ACCRUALS RELATED TO GAS PLANT AS OF DECEMBER 31, 2024**

			CURRENTLY APPROVED					PROPOSED					
		ORIGINAL COST	PROBABLE		NET	CALCULATED ANNUAL		PROBABLE		NET	CALCULATED ANNUAL		
		AS OF	RETIREMENT	SURVIVOR	SALVAGE	ACCRUAL	ACCRUAL	RETIREMENT	SURVIVOR	SALVAGE	ACCRUAL	ACCRUAL	INCREASE/
	ACCOUNT	DECEMBER 31, 2024	DATE	CURVE	PERCENT	AMOUNT	RATE	DATE	CURVE	PERCENT	AMOUNT	RATE	(DECREASE)
	(1)	(2)	(3)	(4)	(5)	(6)=(7)x(2)	(7)	(8)	(9)	(10)	(11)=(12)/(2)	(12)	(13)=(11)-(6)
376.10	STEEL	1,180,911,947.85		52-R3	(40)	30,360,890	2.88		52-R3	(40)	33,317,234	2.82	2,956,344
376.30	PLASTIC	1,022,253,008.71		47-R3	(40)	25,371,207	2.91		47-R3	(40)	29,741,758	2.91	4,370,551
	TOTAL MAINS	2,203,164,956.56				55,732,097	2.90				63,058,992	2.86	7,326,895
378.00	MEASURING AND REGULATING STATION EQUIPMENT	79,032,815.42		36-R1	(15)	2,538,159	3.70		36-R1	(15)	2,835,344	3.59	297,185
	SERVICES												
380.10	METALLIC	19,534,671.98		42-R1	(75)	671,803	3.47		42-R1	(75)	735,071	3.76	63,268
380.20	PLASTIC	915,012,912.90		44-R3	(75)	28,474,942	3.64		44-R3	(75)	33,961,569	3.71	5,486,627
	TOTAL SERVICES	934,547,584.88				29,146,745	3.64				34,696,640	3.71	5,549,895
381.05	METERS - SMALL	55,830,472.88		25-S1	18	1,639,106	2.89		25-S1	18	1,555,168	2.79	(83,938)
381.06	METERS - LARGE	29,981,254.65		30-R3	0	1,046,679	3.66		30-R3	0	1,086,482	3.62	39,803
381.10	METERS - INTELIS	22,972,701.94		20-S2.5	(1)	407,989	5.11		20-S2.5	(1)	1,141,057	4.97	733,068
382.00	METER INSTALLATIONS	178,153,442.78		50-R4	(60)	5,045,264	3.20		50-R4	(60)	5,708,943	3.20	663,679
385.00	INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT	59,745,611.51		25-R3	(15)	2,668,104	5.15		25-R3	(15)	2,919,979	4.89	251,875
386.10	OTHER PROPERTY ON CUSTOMERS' PREMISES	17,625.91		15-S2.5	(10)	0	-		15-S2.5	(10)	0	-	0
	TOTAL DISTRIBUTION PLANT	**3,568,206,701.77**				**98,322,000**	**3.17**				**113,124,618**	**3.17**	**14,802,618**
GENERAL PLANT													
390.10	STRUCTURES AND IMPROVEMENTS												
	GOLDEN VALLEY	11,838,504.77	12-2056	60-S0.5	(10)	338,108	3.01	12-2056	60-S0.5	(10)	367,920	3.11	29,812
	MANKATO	3,073,223.74	12-2047	60-S0.5	(10)	59,806	3.29	12-2047	60-S0.5	(10)	123,268	4.01	63,462
	NORTH MINNEAPOLIS	27,753.59						12-2037	60-S0.5	(10)	1,589	5.73	1,589
	RIVER PLANT	2,024,671.08	12-2043	60-S0.5	(10)	72,023	3.76	12-2043	60-S0.5	(10)	82,241	4.06	10,218
	SOUTH MINNEAPOLIS	10,109,552.71	12-2037	60-S0.5	(10)	500,721	5.06	12-2037	60-S0.5	(10)	560,345	5.54	59,624
	COON RAPIDS	1,810,509.27		FULLY ACCRUED		0	-		FULLY ACCRUED		0	-	0
	LINDEN	10,264,857.57	12-2036	60-S0.5	(10)	442,141	4.87	12-2036	60-S0.5	(10)	602,740	5.87	160,599
	WILLMAR	498,933.29	12-2032	60-S0.5	(10)	12,139	4.74	12-2032	60-S0.5	(10)	47,071	9.43	34,932
	LIVONIA	32,810.00		FULLY ACCRUED		0	-		FULLY ACCRUED		0	-	0
	SUBTOTAL ACCOUNT 390.10	39,680,816.02				1,424,938	3.59				1,785,174	4.50	360,236
	NICOLLET MALL	68,104,126.84	12-2065	60-S0.5	10	522,429	2.08	12-2065	60-S0.5	10	1,540,069	2.26	1,017,640
	TOTAL STRUCTURES AND IMPROVEMENTS	107,784,942.86				1,947,367	3.20				3,325,243	3.09	1,377,876
391.00	OFFICE FURNITURE AND EQUIPMENT												
	OFFICE FURNITURE	8,457,342.39		20-SQ	0	221,561	5.00		20-SQ	0	422,867	5.00	201,306
	OFFICE EQUIPMENT	6,126,821.85		20-SQ	0	81,155	5.00		20-SQ	0	306,341	5.00	225,186
	COMPUTER HARDWARE												
	FULLY ACCRUED	625,781.59		FULLY ACCRUED		0	-		FULLY ACCRUED		0	-	0
	AMORTIZED	36,904,752.75		5-SQ	0	6,049,362	20.00		5-SQ	0	7,380,951	20.00	1,331,589
	TOTAL COMPUTER HARDWARE	37,530,534.34				6,049,362	17.15				7,380,951	19.67	1,331,589
	COMPUTER SOFTWARE - 3-YEAR												
	FULLY ACCRUED	28,726.44							FULLY ACCRUED		0	-	0
	AMORTIZED	5,860,676.63		3-SQ	0	33,769	33.33		3-SQ	0	1,953,364	33.33	1,919,595
	TOTAL COMPUTER SOFTWARE - 3-YEAR	5,889,403.07				33,769	33.33				1,953,364	33.17	1,919,595
	COMPUTER SOFTWARE - 5-YEAR												
	FULLY ACCRUED	45,694,820.55		FULLY ACCRUED		0	-		FULLY ACCRUED		0	-	0
	AMORTIZED	26,803,133.18		5-SQ	0	4,806,408	20.00		5-SQ	0	5,360,627	20.00	554,219
	TOTAL COMPUTER SOFTWARE - 5-YEAR	72,497,953.73				4,806,408	7.34				5,360,627	7.39	554,219
	COMPUTER SOFTWARE - 10-YEAR												
	FULLY ACCRUED	8,879,153.24		FULLY ACCRUED		0	-		FULLY ACCRUED		0	-	0
	AMORTIZED	51,430,923.83		10-SQ	0	3,293,116	10.00		10-SQ	0	5,143,092	10.00	1,849,976
	TOTAL COMPUTER SOFTWARE - 10-YEAR	60,310,077.07				3,293,116	6.73				5,143,092	8.53	1,849,976
	COMPUTER SOFTWARE - 15-YEAR	20,003,027.81		15-SQ	0	836,441	6.67		15-SQ	0	1,334,202	6.67	497,761
	TOTAL COMPUTER SOFTWARE	158,700,461.68				8,969,734	7.06				13,791,285	8.69	4,821,551
	TOTAL OFFICE FURNITURE AND EQUIPMENT	210,815,160.26				15,321,812	9.10				21,901,444	10.39	6,579,632
392.00	TRANSPORTATION EQUIPMENT	47,756,585.80		9-R1.5	15	2,898,992	6.48		9-R1.5	15	4,204,112	8.80	1,305,120
393.00	STORES EQUIPMENT	310,188.88		15-SQ	0	12,623	6.67		15-SQ	0	20,690	6.67	8,067
394.00	TOOLS, SHOP AND GARAGE EQUIPMENT	22,970,306.72		25-SQ	0	753,005	4.00		25-SQ	0	918,812	4.00	165,807
395.00	LABORATORY EQUIPMENT	93,954.96		25-SQ	0	3,758	4.00		25-SQ	0	3,758	4.00	0
396.00	POWER OPERATED EQUIPMENT	15,330,184.10		15-R2	10	463,827	3.48		15-R2	10	706,113	4.61	242,286
397.10	COMMUNICATION EQUIPMENT	2,096,197.01		15-SQ	0	41,256	6.67		15-SQ	0	139,816	6.67	98,560

CENTERPOINT ENERGY MINNESOTA GAS

COMPARISON OF CURRENT AND PROPOSED SURVIVOR CURVES, NET SALVAGE PERCENTS AND ANNUAL DEPRECIATION RATES AND ACCRUALS RELATED TO GAS PLANT AS OF DECEMBER 31, 2024

			CURRENTLY APPROVED					PROPOSED					
		ORIGINAL COST	PROBABLE		NET	CALCULATED ANNUAL		PROBABLE		NET	CALCULATED ANNUAL		
		AS OF	RETIREMENT	SURVIVOR	SALVAGE	ACCRUAL	ACCRUAL	RETIREMENT	SURVIVOR	SALVAGE	ACCRUAL	ACCRUAL	INCREASE/
	ACCOUNT	DECEMBER 31, 2024	DATE	CURVE	PERCENT	AMOUNT	RATE	DATE	CURVE	PERCENT	AMOUNT	RATE	(DECREASE)
	(1)	(2)	(3)	(4)	(5)	(6)=(7)x(2)	(7)	(8)	(9)	(10)	(11)=(12)/(2)	(12)	(13)=(11)-(6)
397.11	COMMUNICATION EQUIPMENT - CELL PHONES	301,749.74		3-SQ	0	100,573	33.33		3-SQ	0	100,573	33.33	0
397.20	COMMUNICATION EQUIPMENT - METER READING	2,492,576.08		12-R2.5	(5)	127,372	5.58		12-R2.5	(5)	43,080	1.73	(84,292)
397.21	COMMUNICATION EQUIPMENT - ERTS	54,474,009.01		12-R2.5	(5)	2,167,065	3.81		12-R2.5	(5)	1,883,874	3.46	(283,191)
398.10	MISCELLANEOUS EQUIPMENT												
	FULLY ACCRUED	98,712.26		FULLY ACCRUED		0	-		FULLY ACCRUED		0	-	0
	AMORTIZED	179,726.76		15-SQ	0	13,946	6.67		15-SQ	0	11,988	6.67	(1,958)
	TOTAL MISCELLANEOUS EQUIPMENT	278,439.02				13,946	4.98				11,988	4.31	(1,958)
398.50	WATER TREATMENT												
	RIVER PLANT	2,386,149.48	12-2043	SQUARE	(15)	27,574	1.03	12-2043	SQUARE	(15)	29,158	1.22	1,584
	WATERVILLE	671,854.26	12-2036	SQAURE	(15)	4,712	0.70	12-2036	SQAURE	(15)	6,082	0.91	1,370
	TOTAL WATER TREATMENT	3,058,003.74				32,286	0.96				35,240	1.15	2,954
	TOTAL GENERAL PLANT	**467,762,298.18**				**23,883,882**	**6.45**				**33,294,743**	**7.12**	**9,410,861**
RESERVE ADJUSTMENT FOR AMORTIZATION													
391.10	OFFICE FURNITURE AND EQUIPMENT - OFFICE FURNITURE					0					0		0
391.20	OFFICE FURNITURE AND EQUIPMENT - COMPUTER EQUIPMENT					0					0		0
391.30	OFFICE FURNITURE AND EQUIPMENT - COMPUTER HARDWARE					0					0		0
391.40	OFFICE FURNITURE AND EQUIPMENT - COMPUTER SOFTWARE					0					0		0
393.00	STORES EQUIPMENT					0					0		0
394.00	TOOLS, SHOP AND GARAGE EQUIPMENT					0					0		0
395.00	LABORATORY EQUIPMENT					0					0		0
397.10	COMMUNICATION EQUIPMENT					0					0		0
398.10	MISCELLANEOUS EQUIPMENT					0					0		0
	TOTAL RESERVE ADJUSTMENT FOR AMORTIZATION					**-**					**0**		**-**
	TOTAL DEPRECIABLE PLANT	**4,160,766,600.38**				**124,529,302**	**3.50**				**149,982,094**	**3.60**	**25,452,792**
NONDEPRECIABLE PLANT AND ACCOUNTS NOT STUDIED													
304.00	LAND	1,247,182.54											
305.00	STRUCTURES AND IMPROVEMENTS - BLAINE	34,426.56											
305.00	STRUCTURES AND IMPROVEMENTS - BUFFALO	13,126.40											
350.10	LAND	34,307.34											
374.00	LAND	5,073,443.24											
389.00	LAND	11,859,995.22											
390.10	STRUCTURES AND IMPROVEMENTS - LAKE GENEVA	485.67											
390.20	LEASEHOLD IMPROVEMENTS *	53,837.36											
	TOTAL NONDEPRECIABLE PLANT AND ACCOUNTS NOT STUDIED	**18,316,804.33**											
	TOTAL GAS PLANT	**4,179,083,404.71**											

* LEASEHOLD IMPROVEMENTS ARE DEPRECIATED OVER THE LIFE OF THE LEASE.

State of Minnesota
Minnesota Department of Commerce

Utility Information Request

Docket Number: G-008/D-25-286 - 2025 Annual Depreciation Study	Date of Request: 7/30/2025
Requested From: CENTERPOINT ENERGY MINNESOTA GAS	Response Due: 8/11/2025

Analyst Requesting Information: Ashley Uphus, Craig Addonizio

Type of Inquiry: Financial

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
DOC 003	Topic: Future Material Additions or Retirements Reference(s): N/A **Request:** If applicable, please provide a list of any major future additions or retirements that the Company believes may have a material impact on the current study. **Response:** 1. Accelerated replacement of Intelis meters to upgrade meter technology capabilities, improve reliability and provide safety opportunities. 2. New asset classes for geothermal network.

Response By: Jessica Barnard
Title: Analyst, Regulatory & Rates
Department: Regulatory Portfolio Management MN
Telephone: 612-861-8415

CENTERPOINT ENERGY MINNESOTA GAS

COMPARISON OF CURRENT AND PROPOSED SURVIVOR CURVES, NET SALVAGE PERCENTS AND ANNUAL DEPRECIATION RATES AND ACCRUALS RELATED TO GAS PLANT AS OF DECEMBER 31, 2024

			CURRENTLY APPROVED						PROPOSED					
	ACCOUNT	ORIGINAL COST AS OF DECEMBER 31, 2024	PROBABLE RETIREMENT DATE	SURVIVOR CURVE	NET SALVAGE PERCENT	CALCULATED ANNUAL ACCRUAL AMOUNT	CALCULATED ANNUAL ACCRUAL RATE	PROBABLE RETIREMENT DATE	SURVIVOR CURVE	NET SALVAGE PERCENT	CALCULATED ANNUAL ACCRUAL AMOUNT	CALCULATED ANNUAL ACCRUAL RATE	INCREASE/ (DECREASE)
	(1)	(2)	(3)	(4)	(5)	(6)=(7)x(2)	(7)	(8)	(9)	(10)	(11)=(12)/(2)	(12)	(13)=(11)-(6)
INTANGIBLE PLANT													
303.00	MISCELLANEOUS INTANGIBLE PLANT	33,772,254.59		f	0	719,349	2.13		41-SQ	0	843,185	2.50	123,836
	TOTAL INTANGIBLE PLANT	**33,772,254.59**				**719,349**	**2.13**				**843,185**	**2.50**	**123,836**
PRODUCTION PLANT													
305.00	STRUCTURES AND IMPROVEMENTS												
	LAKE GENEVA	127,175.23	12-2045	85-S0.5	(50)	1,399	1.10	12-2045	85-S0.5	(50)	1,779	1.40	380
	RUM RIVER	695,541.93	12-2061	85-S0.5	(50)	16,484	2.37	12-2061	85-S0.5	(50)	17,571	2.53	1,087
	DAKOTA STATION	1,454,147.94	12-2041	85-S0.5	(50)	34,172	2.35	12-2041	85-S0.5	(50)	66,914	4.60	32,742
	GOLDEN VALLEY	357,895.10	12-2047	85-S0.5	(50)	10,880	3.04	12-2047	85-S0.5	(50)	11,483	3.21	603
	MANKATO	732,766.57	12-2047	85-S0.5	(50)	31,875	4.35	12-2047	85-S0.5	(50)	31,433	4.29	(442)
	NORTH MINNEAPOLIS	779,264.97	12-2037	85-S0.5	(50)	51,821	6.65	12-2037	85-S0.5	(50)	59,731	7.67	7,910
	RIVER PLANT	1,064,448.14	12-2043	85-S0.5	(50)	43,004	4.04	12-2043	85-S0.5	(50)	48,534	4.56	5,530
	SOUTH MINNEAPOLIS	357,600.71	12-2037	85-S0.5	(50)	26,462	7.40	12-2037	85-S0.5	(50)	25,357	7.09	(1,105)
	TOTAL STRUCTURES AND IMPROVEMENTS	5,568,840.59				216,098	3.88				262,802	4.72	46,704
311.00	LIQUEFIED PETROLEUM GAS EQUIPMENT												
	LAKE GENEVA	884,040.01	12-2045	65-S1	(25)	17,769	2.01	12-2045	65-S1	(25)	18,879	2.14	1,110
	RUM RIVER	2,535,748.33	12-2061	65-S1	(25)	47,672	1.88	12-2061	65-S1	(25)	52,038	2.05	4,366
	DAKOTA STATION	9,192,264.21	12-2041	65-S1	(25)	170,057	1.85	12-2041	65-S1	(25)	295,617	3.22	125,560
	GOLDEN VALLEY	4,983,767.06	12-2047	65-S1	(25)	154,497	3.10	12-2047	65-S1	(25)	153,184	3.07	(1,313)
	MANKATO	3,023,024.12	12-2047	65-S1	(25)	75,273	2.49	12-2047	65-S1	(25)	75,917	2.51	644
	NORTH MINNEAPOLIS	2,267,993.69	12-2037	65-S1	(25)	66,452	2.93	12-2037	65-S1	(25)	79,631	3.51	13,179
	RIVER PLANT	2,759,864.75	12-2043	65-S1	(25)	53,541	1.94	12-2043	65-S1	(25)	57,692	2.09	4,151
	SOUTH MINNEAPOLIS	1,489,177.04	12-2037	65-S1	(25)	10,871	0.73	12-2037	65-S1	(25)	1,493	0.10	(9,378)
	TOTAL LIQUEFIED PETROLEUM GAS EQUIPMENT	27,135,879.21				596,133	2.20				734,451	2.71	138,318
320.00	OTHER EQUIPMENT												
	LAKE GENEVA	78,403.11	12-2045	30-S0.5	0	2,917	3.72	12-2045	30-S0.5	0	3,166	4.04	249
	RUM RIVER	365,149.52	12-2061	30-S0.5	0	11,648	3.19	12-2061	30-S0.5	0	12,348	3.38	700
	DAKOTA STATION	478,659.88	12-2041	30-S0.5	0	19,960	4.17	12-2041	30-S0.5	0	22,186	4.64	2,226
	GOLDEN VALLEY	672,935.45	12-2047	30-S0.5	0	21,534	3.20	12-2047	30-S0.5	0	27,916	4.15	6,382
	MANKATO	198,716.27	12-2047	30-S0.5	0	6,895	3.47	12-2047	30-S0.5	0	7,929	3.99	1,034
	NORTH MINNEAPOLIS	535,283.07	12-2037	30-S0.5	0	24,998	4.67	12-2037	30-S0.5	0	27,313	5.10	2,315
	RIVER PLANT	441,067.55	12-2043	30-S0.5	0	18,348	4.16	12-2043	30-S0.5	0	19,532	4.43	1,184
	SOUTH MINNEAPOLIS	328,348.27	12-2037	30-S0.5	0	9,686	2.95	12-2037	30-S0.5	0	14,437	4.40	4,751
	TOTAL OTHER EQUIPMENT	3,098,563.12				115,987	3.74				134,827	4.35	18,840
320.20	OTHER EQUIPMENT - ELECTROLYZER EQUIPMENT	3,618,208.86		17-R3	0	213,836	5.91		17-R3	0	213,173	5.89	(663)
	TOTAL PRODUCTION PLANT	**39,421,491.78**				**1,142,054**	**2.90**				**1,345,253**	**3.41**	**203,199**
UNDERGROUND STORAGE PLANT													
350.20	RIGHTS-OF-WAY	50,176.36	12-2036	SQUARE	(20)	948	1.89	12-2036	SQUARE	(20)	959	1.91	11
351.00	STRUCTURES AND IMPROVEMENTS	2,062,748.98	12-2036	60-S1.5	(20)	69,308	3.36	12-2036	60-S1.5	(20)	86,879	4.21	17,571
352.00	WELLS	4,711,725.83	12-2036	50-R3	(20)	39,107	0.83	12-2036	50-R3	(20)	63,178	1.34	24,071
352.10	STORAGE LEASEHOLDS AND RIGHTS	368,171.86	12-2036	SQUARE	(20)	4,970	1.35	12-2036	SQUARE	(20)	4,978	1.35	8
352.20	RESERVOIRS	1,737,606.13	12-2036	50-R2	(20)	19,287	1.11	12-2036	50-R2	(20)	17,280	0.99	(2,007)
352.30	NONRECOVERABLE NATURAL GAS	4,933,397.05	12-2036	SQUARE	(20)	0	-	12-2036	SQUARE	(20)	0	-	0
353.00	LINES	7,030,779.84	12-2036	50-R3	(20)	254,514	3.62	12-2036	50-R3	(20)	271,939	3.87	17,425
354.00	COMPRESSOR STATION EQUIPMENT	3,824,846.45	12-2036	50-R3	(20)	117,040	3.06	12-2036	50-R3	(20)	122,326	3.20	5,286
355.00	MEASURING AND REGULATING EQUIPMENT	359,459.59	12-2036	40-R2	(20)	29,655	8.25	12-2036	40-R2	(20)	30,312	8.43	657
356.00	PURIFICATION EQUIPMENT	1,131,789.98	12-2036	40-R2	(20)	43,461	3.84	12-2036	40-R2	(20)	42,768	3.78	(693)
357.00	OTHER EQUIPMENT	242,110.17	12-2036	30-S0.5	(20)	18,981	7.84	12-2036	30-S0.5	(20)	18,333	7.57	(648)
	TOTAL UNDERGROUND STORAGE PLANT	**26,452,812.24**				**597,274**	**2.26**				**658,952**	**2.49**	**61,678**
OTHER STORAGE PLANT													
361.00	STRUCTURES AND IMPROVEMENTS	3,540,243.58	12-2041	60-S2.5	(20)	104,791	2.96	12-2041	60-S2.5	(20)	115,745	3.27	10,954
362.00	GAS HOLDERS	4,468,532.45	12-2041	55-R3	(20)	23,236	0.52	12-2041	55-R3	(20)	24,467	0.55	1,231
363.00	PURIFICATION EQUIPMENT	809,677.71	12-2041	40-R2	(10)	3,320	0.41	12-2041	40-R2	(10)	2,551	0.32	(769)
363.10	LIQUEFACTION EQUIPMENT	4,726,688.50	12-2041	50-R3	(10)	30,723	0.65	12-2041	50-R3	(10)	35,537	0.75	4,814
363.20	VAPORIZING EQUIPMENT	2,184,091.73	12-2041	50-R2.5	(10)	15,944	0.73	12-2041	50-R2.5	(10)	17,588	0.81	1,644
363.30	COMPRESSOR STATION EQUIPMENT	4,972,056.88	12-2041	40-R2	(10)	286,888	5.77	12-2041	40-R2	(10)	301,650	6.07	14,762
363.40	MEASURING AND REGULATING EQUIPMENT	2,574,257.02	12-2041	50-R2.5	(10)	135,921	5.28	12-2041	50-R2.5	(10)	146,879	5.71	10,958
363.50	OTHER EQUIPMENT	1,875,493.95	12-2041	40-S2.5	(10)	38,823	2.07	12-2041	40-S2.5	(10)	70,926	3.78	32,103
	TOTAL OTHER STORAGE PLANT	**25,151,041.82**				**639,646**	**2.54**				**715,343**	**2.84**	**75,697**
DISTRIBUTION PLANT													
375.00	STRUCTURES AND IMPROVEMENTS	4,760,235.24		50-R1.5	(25)	122,814	2.58		50-R1.5	(25)	122,013	2.56	(801)
	MAINS												
376.10	STEEL	1,180,911,947.85		52-R3	(40)	34,010,264	2.88		52-R3	(40)	33,317,234	2.82	(693,030)

CENTERPOINT ENERGY MINNESOTA GAS

COMPARISON OF CURRENT AND PROPOSED SURVIVOR CURVES, NET SALVAGE PERCENTS AND ANNUAL DEPRECIATION RATES AND ACCRUALS RELATED TO GAS PLANT AS OF DECEMBER 31, 2024

			CURRENTLY APPROVED						PROPOSED					
	ACCOUNT	ORIGINAL COST AS OF DECEMBER 31, 2024	PROBABLE RETIREMENT DATE	SURVIVOR CURVE	NET SALVAGE PERCENT	CALCULATED ANNUAL ACCRUAL AMOUNT	CALCULATED ANNUAL ACCRUAL RATE	PROBABLE RETIREMENT DATE	SURVIVOR CURVE	NET SALVAGE PERCENT	CALCULATED ANNUAL ACCRUAL AMOUNT	CALCULATED ANNUAL ACCRUAL RATE	INCREASE/ (DECREASE)
	(1)	(2)	(3)	(4)	(5)	(6)=(7)x(2)	(7)	(8)	(9)	(10)	(11)=(12)/(2)	(12)	(13)=(11)-(6)
376.30	PLASTIC	1,022,253,008.71		47-R3	(40)	29,747,563	2.91		47-R3	(40)	29,741,758	2.91	(5,805)
	TOTAL MAINS	2,203,164,956.56				63,757,827	2.89				63,058,992	2.86	(698,835)
378.00	MEASURING AND REGULATING STATION EQUIPMENT	79,032,815.42		36-R1	(15)	2,924,214	3.70		36-R1	(15)	2,835,344	3.59	(88,870)
	SERVICES												
380.10	METALLIC	19,534,671.98		42-R1	(75)	677,853	3.47		42-R1	(75)	735,071	3.76	57,218
380.20	PLASTIC	915,012,912.90		44-R3	(75)	33,306,470	3.64		44-R3	(75)	33,961,569	3.71	655,099
	TOTAL SERVICES	934,547,584.88				33,984,323	3.64				34,696,640	3.71	712,317
381.05	METERS - SMALL	55,830,472.88		25-S1	18	1,613,501	2.89		25-S1	18	1,555,168	2.79	(58,333)
381.06	METERS - LARGE	29,981,254.65		30-R3	0	1,097,314	3.66		30-R3	0	1,086,482	3.62	(10,832)
381.10	METERS - INTELIS	22,972,701.94		20-S2.5	(1)	1,173,905	5.11		20-S2.5	(1)	1,141,057	4.97	(32,848)
382.00	METER INSTALLATIONS	178,153,442.78		50-R4	(60)	5,700,910	3.20		50-R4	(60)	5,708,943	3.20	8,033
385.00	INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT	59,745,611.51		25-R3	(15)	3,076,899	5.15		25-R3	(15)	2,919,979	4.89	(156,920)
386.10	OTHER PROPERTY ON CUSTOMERS' PREMISES	17,625.91		15-S2.5	(10)	0	-		15-S2.5	(10)	0	-	0
	TOTAL DISTRIBUTION PLANT	**3,568,206,701.77**				**113,451,707**	**3.18**				**113,124,618**	**3.17**	**(327,089)**
GENERAL PLANT													
390.10	STRUCTURES AND IMPROVEMENTS												
	GOLDEN VALLEY	11,838,504.77	12-2056	60-S0.5	(10)	356,339	3.01	12-2056	60-S0.5	(10)	367,920	3.11	11,581
	MANKATO	3,073,223.74	12-2047	60-S0.5	(10)	101,109	3.29	12-2047	60-S0.5	(10)	123,268	4.01	22,159
	NORTH MINNEAPOLIS	27,753.59				0		12-2037	60-S0.5	(10)	1,589	5.73	1,589
	RIVER PLANT	2,024,671.08	12-2043	60-S0.5	(10)	76,128	3.76	12-2043	60-S0.5	(10)	82,241	4.06	6,113
	SOUTH MINNEAPOLIS	10,109,552.71	12-2037	60-S0.5	(10)	511,543	5.06	12-2037	60-S0.5	(10)	560,345	5.54	48,802
	COON RAPIDS	1,810,509.27		FULLY ACCRUED		0	-		FULLY ACCRUED		0	-	0
	LINDEN	10,264,857.57	12-2036	60-S0.5	(10)	499,899	4.87	12-2036	60-S0.5	(10)	602,740	5.87	102,841
	WILLMAR	498,933.29	12-2032	60-S0.5	(10)	23,649	4.74	12-2032	60-S0.5	(10)	47,071	9.43	23,422
	LIVONIA	32,810.00		FULLY ACCRUED		0	-		FULLY ACCRUED		0	-	0
	SUBTOTAL ACCOUNT 390.10	39,680,816.02				1,568,667	3.95				1,785,174	4.50	216,507
	NICOLLET MALL	68,104,126.84	12-2065	60-S0.5	10	1,416,566	2.08	12-2065	60-S0.5	10	1,540,069	2.26	123,503
	TOTAL STRUCTURES AND IMPROVEMENTS	107,784,942.86				2,985,233	2.77				3,325,243	3.09	340,010
391.00	OFFICE FURNITURE AND EQUIPMENT												
	OFFICE FURNITURE	8,457,342.39		20-SQ	0	422,867	5.00		20-SQ	0	422,867	5.00	(0)
	OFFICE EQUIPMENT	6,126,821.85		20-SQ	0	306,341	5.00		20-SQ	0	306,341	5.00	(0)
	COMPUTER HARDWARE												
	FULLY ACCRUED	625,781.59		FULLY ACCRUED		0	-		FULLY ACCRUED		0	-	0
	AMORTIZED	36,904,752.75		5-SQ	0	7,380,951	20.00		5-SQ	0	7,380,951	20.00	0
	TOTAL COMPUTER HARDWARE	37,530,534.34				7,380,951	19.67				7,380,951	19.67	0
	COMPUTER SOFTWARE - 3-YEAR												
	FULLY ACCRUED	28,726.44							FULLY ACCRUED		0	-	0
	AMORTIZED	5,860,676.63		3-SQ	0	1,953,364	33.33		3-SQ	0	1,953,364	33.33	0
	TOTAL COMPUTER SOFTWARE - 3-YEAR	5,889,403.07				1,953,364	33.17				1,953,364	33.17	0
	COMPUTER SOFTWARE - 5-YEAR												
	FULLY ACCRUED	45,694,820.55		FULLY ACCRUED		0	-		FULLY ACCRUED		0	-	0
	AMORTIZED	26,803,133.18		5-SQ	0	5,360,627	20.00		5-SQ	0	5,360,627	20.00	0
	TOTAL COMPUTER SOFTWARE - 5-YEAR	72,497,953.73				5,360,627	7.39				5,360,627	7.39	0
	COMPUTER SOFTWARE - 10-YEAR												
	FULLY ACCRUED	8,879,153.24		FULLY ACCRUED		0	-		FULLY ACCRUED		0	-	0
	AMORTIZED	51,430,923.83		10-SQ	0	5,143,092	10.00		10-SQ	0	5,143,092	10.00	(0)
	TOTAL COMPUTER SOFTWARE - 10-YEAR	60,310,077.07				5,143,092	8.53				5,143,092	8.53	(0)
	COMPUTER SOFTWARE - 15-YEAR	20,003,027.81		15-SQ	0	1,334,202	6.67		15-SQ	0	1,334,202	6.67	0
	TOTAL COMPUTER SOFTWARE	158,700,461.68				13,791,284	8.69				13,791,285	8.69	1
	TOTAL OFFICE FURNITURE AND EQUIPMENT	210,815,160.26				21,901,443	10.39				21,901,444	10.39	1
392.00	TRANSPORTATION EQUIPMENT	47,756,585.80		9-R1.5	15	3,094,627	6.48		9-R1.5	15	4,204,112	8.80	1,109,485
393.00	STORES EQUIPMENT	310,188.88		15-SQ	0	20,690	6.67		15-SQ	0	20,690	6.67	0
394.00	TOOLS, SHOP AND GARAGE EQUIPMENT	22,970,306.72		25-SQ	0	918,812	4.00		25-SQ	0	918,812	4.00	(0)
395.00	LABORATORY EQUIPMENT	93,954.96		25-SQ	0	3,758	4.00		25-SQ	0	3,758	4.00	(0)
396.00	POWER OPERATED EQUIPMENT	15,330,184.10		15-R2	10	533,490	3.48		15-R2	10	706,113	4.61	172,623
397.10	COMMUNICATION EQUIPMENT	2,096,197.01		15-SQ	0	139,816	6.67		15-SQ	0	139,816	6.67	(0)
397.11	COMMUNICATION EQUIPMENT - CELL PHONES	301,749.74		3-SQ	0	100,573	33.33		3-SQ	0	100,573	33.33	(0)
397.20	COMMUNICATION EQUIPMENT - METER READING	2,492,576.08		12-R2.5	(5)	139,086	5.58		12-R2.5	(5)	43,080	1.73	(96,006)
397.21	COMMUNICATION EQUIPMENT - ERTS	54,474,009.01		12-R2.5	(5)	2,075,460	3.81		12-R2.5	(5)	1,883,874	3.46	(191,586)

CENTERPOINT ENERGY MINNESOTA GAS

COMPARISON OF CURRENT AND PROPOSED SURVIVOR CURVES, NET SALVAGE PERCENTS AND ANNUAL DEPRECIATION RATES AND ACCRUALS RELATED TO GAS PLANT AS OF DECEMBER 31, 2024

			CURRENTLY APPROVED					PROPOSED					
	ACCOUNT	ORIGINAL COST AS OF DECEMBER 31, 2024	PROBABLE RETIREMENT DATE	SURVIVOR CURVE	NET SALVAGE PERCENT	CALCULATED ANNUAL ACCRUAL AMOUNT	CALCULATED ANNUAL ACCRUAL RATE	PROBABLE RETIREMENT DATE	SURVIVOR CURVE	NET SALVAGE PERCENT	CALCULATED ANNUAL ACCRUAL AMOUNT	CALCULATED ANNUAL ACCRUAL RATE	INCREASE/ (DECREASE)
	(1)	(2)	(3)	(4)	(5)	(6)=(7)x(2)	(7)	(8)	(9)	(10)	(11)=(12)/(2)	(12)	(13)=(11)-(6)
398.10	MISCELLANEOUS EQUIPMENT												
	FULLY ACCRUED	98,712.26		FULLY ACCRUED		0	-		FULLY ACCRUED		0	-	0
	AMORTIZED	179,726.76		15-SQ	0	11,988	6.67		15-SQ	0	11,988	6.67	0
	TOTAL MISCELLANEOUS EQUIPMENT	278,439.02				11,988	4.31				11,988	4.31	0
398.50	WATER TREATMENT												
	RIVER PLANT	2,386,149.48	12-2043	SQUARE	(15)	24,577	1.03	12-2043	SQUARE	(15)	29,158	1.22	4,581
	WATERVILLE	671,854.26	12-2036	SQAURE	(15)	4,703	0.70	12-2036	SQAURE	(15)	6,082	0.91	1,379
	TOTAL WATER TREATMENT	3,058,003.74				29,280	0.96				35,240	1.15	5,960
	TOTAL GENERAL PLANT	**467,762,298.18**				**31,954,256**	**6.83**				**33,294,743**	**7.12**	**1,340,487**
RESERVE ADJUSTMENT FOR AMORTIZATION													
391.10	OFFICE FURNITURE AND EQUIPMENT - OFFICE FURNITURE					0					0		0
391.20	OFFICE FURNITURE AND EQUIPMENT - COMPUTER EQUIPMENT					0					0		0
391.30	OFFICE FURNITURE AND EQUIPMENT - COMPUTER HARDWARE					0					0		0
391.40	OFFICE FURNITURE AND EQUIPMENT - COMPUTER SOFTWARE					0					0		0
393.00	STORES EQUIPMENT					0					0		0
394.00	TOOLS, SHOP AND GARAGE EQUIPMENT					0					0		0
395.00	LABORATORY EQUIPMENT					0					0		0
397.10	COMMUNICATION EQUIPMENT					0					0		0
398.10	MISCELLANEOUS EQUIPMENT					0					0		0
	TOTAL RESERVE ADJUSTMENT FOR AMORTIZATION					**-**					**0**		**-**
	TOTAL DEPRECIABLE PLANT	**4,160,766,600.38**				**148,504,286**	**3.57**				**149,982,094**	**3.60**	**1,477,808**
NONDEPRECIABLE PLANT AND ACCOUNTS NOT STUDIED													
304.00	LAND	1,247,182.54											
305.00	STRUCTURES AND IMPROVEMENTS - BLAINE	34,426.56											
305.00	STRUCTURES AND IMPROVEMENTS - BUFFALO	13,126.40											
350.10	LAND	34,307.34											
374.00	LAND	5,073,443.24											
389.00	LAND	11,859,995.22											
390.10	STRUCTURES AND IMPROVEMENTS - LAKE GENEVA	485.67											
390.20	LEASEHOLD IMPROVEMENTS *	53,837.36											
	TOTAL NONDEPRECIABLE PLANT AND ACCOUNTS NOT STUDIED	**18,316,804.33**											
	TOTAL GAS PLANT	**4,179,083,404.71**											

* LEASEHOLD IMPROVEMENTS ARE DEPRECIATED OVER THE LIFE OF THE LEASE.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. G008/D-25-286

Dated this **17th** day of **September 2025**

/s/Sharon Ferguson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Jessica	Barnard	jessica.barnard@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	D-25-286
2	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		No	D-25-286
3	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	D-25-286
4	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	D-25-286
5	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	D-25-286
6	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	D-25-286
7	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	D-25-286