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October 20, 2014

**VIA E-Filing
Public Document
Trade Secret Information Has Been Excised**

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

Re: Reply Comments of CenterPoint Energy to the Minnesota Department of
Commerce's comments to CenterPoint Energy's Compliance Filing in
Docket No. G-008/GR-13-316

Dear Dr. Haar:

CenterPoint Energy has received and reviewed the October 8, 2014 comments from the Minnesota Department of Commerce's (Department or DOC) concerning CenterPoint Energy's Compliance filing in its 2013 General Rate Case, Docket No. G-008/GR-13-316, filed on September 8, 2014. In the cover letter to its comments, the Department recommended approval of the Company's Compliance filing and CenterPoint Energy agrees with that recommendation.

However, in its comments, the DOC also stated that the revenue apportionment used in the Compliance filing "may be inconsistent with the Commission's Order" and requested the presentation of an additional revenue apportionment. To clarify this discussion, we are providing additional information on the revenue apportionment used both in the financial schedules that were submitted based on the Administrative Law Judge (ALJ) report and in the Compliance filing and an additional revenue apportionment scenario to respond to the DOC's request.

Table 1 below shows the revenue apportionment initially proposed by the Company (which the ALJ found reasonable and which was accepted by the Commission). As described in the testimony of Mr. Burl Drews, the only proposed increase in non-gas revenues for the SVDF and LV classes were for increases in the Conservation Cost Recovery Charge ("CCRC") that are included in base rates and collected through the volumetric delivery charge to recover Conservation Improvement Program ("CIP") costs approved by the Commission. The increase for the Commercial/Industrial C class is also due to the increase in the CCRC, as well as an increase in Gas Affordability Service Program ("GAP") costs. Otherwise, the base rates for these classes are not being changed. (Drews direct testimony starting on page 4 line 17).

Table 1: Proposed in Original Filing

Amounts shown in \$000s

Class	Non-Gas Revenue @ Present Rates	CCRC Test Year Revenue @ Present Rates	non-CIP Test Year Revenue @ Present Rates	Requested CCRC Increase	Requested non-CIP Increase	Requested CCRC	Requested non-CIP Non Gas Revenue	Requested Total Non Gas Revenue	column I PCT of Total
(a)	(b)=(c)+(d)	(c)	(d)	(e)	(f)	(g)=(c)+(e)	(h)=(d)+(f)	(i)=(g)+(h)	(j)
Residential	186,132	4,277	181,855	8,003	27,545	12,280	209,400	221,680	67.4%
Comm A	8,064	148	7,916	277	1,068	425	8,984	9,409	2.9%
C/I Firm B	10,963	309	10,655	578	(380)	887	10,275	11,162	3.4%
C/I Firm C	40,022	1,465	38,557	2,741	105	4,206	38,662	42,868	13.0%
Sm D F A	11,423	624	10,799	1,167	16	1,791	10,815	12,606	3.8%
Sm D F B	6,939	433	6,506	811	(27)	1,244	6,479	7,723	2.3%
Lg Vol	21,274	1,335	19,939	2,498	(79)	3,833	19,860	23,693	7.2%
TOTAL	284,817	8,591	276,227	16,075	28,248	24,666	304,475	329,141	100.0%

The ALJ discussed revenue apportionment on pages 128-136 of her report and found CenterPoint Energy's proposed revenue apportionment to be reasonable. Pursuant to the PUC notice on April 10, 2014, the Company filed financial and rate design schedules based on the ALJ report on April 16, 2014. The revenue apportionment for these schedules is shown below in table 2. Due to rounding, the resulting revenue apportionment shown in column P below is consistent with, but not exactly equal to the proposed apportionment. However, the only increase in non-gas revenues for the SVDF and LV classes are for increases in the CCRC and the increase for the Commercial/Industrial C class is also due to the increase in the CCRC, as well as GAP costs. Otherwise, the base revenues for these classes were not changed.

Table 2: Based on ALJ Report

Amounts shown in \$000s

Class	Non-Gas Revenue @ Present Rates	CCRC Test Year Revenue @ Present Rates	non-CIP Test Year Revenue @ Present Rates	ALJ CCRC Increase	ALJ non-CIP Increase	ALJ CCRC	ALJ non-CIP Non Gas Revenue	ALJ Total Non Gas Revenue	column N PCT of Total
(a)	(b)=(c)+(d)	(c)	(d)	(k)	(l)	(m)=(c)+(k)	(n)=(d)+(l)	(o)=(m)+(n)	(p)
Residential	186,132	4,277	181,855	8,003	12,104	12,280	193,959	206,239	66.5%
Comm A	8,064	148	7,916	277	513	425	8,429	8,854	2.9%
C/I Firm B	10,963	309	10,655	578	609	887	11,264	12,151	3.9%
C/I Firm C	40,022	1,465	38,557	2,741	2,338	4,206	40,895	45,101	14.0%
Sm D F A	11,423	624	10,799	1,167	-	1,791	10,799	12,590	3.7%
Sm D F B	6,939	433	6,506	811	-	1,244	6,506	7,750	2.2%
Lg Vol	21,274	1,335	19,939	2,498	-	3,833	19,939	23,772	6.8%
TOTAL	284,817	8,591	276,227	16,075	15,564	24,666	291,791	316,457	100.0%

The PUC notice that required the financial and rate design schedules gave parties until April 21, 2014 to file comments and raise any issues or concerns with the schedules. No comments were received on the schedules (exceptions to the ALJ report were filed separately).

The Commission discussed revenue apportionment in section XIX of its Order (starting on page 41) and concurred “with the Administrative Law Judge and accepts her findings, conclusions, and recommendation on this issue.” Table 3 below shows the revenue apportionment used in the Compliance filing. Similar to the revenue apportionment used in the ALJ schedules, the resulting revenue apportionment shown in column V below is consistent with, but not exactly equal to the proposed apportionment, again, due to rounding. However, the only increase in non-gas revenues for the SVDF and LV classes were for increases in the CCRC and the increase for the Commercial/Industrial C class is also due to the increase in the CCRC, as well as for the GAP costs. Otherwise, the base revenues for these classes were not changed.

Table 3: Compliance Filing
Amounts shown in \$000s

Class	Non-Gas Revenue @ Present Rates	CCRC Test Year Revenue @ Present Rates	non-CIP Test Year Revenue @ Present Rates	Compl. CCRC Increase	Compl. non-CIP Increase	Comp. CCRC	Comp. non-CIP Non Gas Revenue	Comp. Total Non Gas Revenue	column T PCT of Total
(a)	(b)=(c)+(d)	(c)	(d)	(q)	(r)	(s)=(c)+(q)	(t)=(d)+(r)	(u)=(s)+(t)	(v)
Residential	186,132	4,277	181,855	8,003	13,114	12,280	194,969	207,249	66.5%
Comm A	8,064	148	7,916	277	556	425	8,472	8,897	2.9%
C/I Firm B	10,963	309	10,655	578	660	887	11,315	12,202	3.9%
C/I Firm C	40,022	1,465	38,557	2,741	2,534	4,206	41,091	45,297	14.0%
Sm D F A	11,423	624	10,799	1,167	-	1,791	10,799	12,590	3.7%
Sm D F B	6,939	433	6,506	811	(1)	1,244	6,505	7,749	2.2%
Lg Vol	21,274	1,335	19,939	2,498	-	3,833	19,939	23,772	6.8%
TOTAL	284,817	8,591	276,227	16,075	16,863	24,666	293,090	317,756	100.0%

CenterPoint Energy continues to support the revenue apportionment used in both the ALJ schedules and the Compliance filing. However, we are providing an additional revenue apportionment calculation in table 4 below to respond to the DOC request which shows the result when revenue is re-apportioned among firm classes¹. This methodology increases the revenue required from the Residential class and decreases the revenue required from the Commercial/Industrial B and C classes. The supporting calculations and details are included as ATTACHMENT A, which is Trade Secret Information. In general, the new proposed revenue apportionment is closer to cost – in

¹ The Company notes that if the revenue from firm classes in total is changed, there would be an impact to bad debt expense and late payment revenue. However, it is not expected to be significant.

fact residential rates are increased by an additional \$4.7 million beyond the amount shown in the Company's Compliance filing. While, CenterPoint Energy supports moving natural gas rates closer to cost, there are concerns with this specific proposal beyond the additional unintended increase to the Residential and small business classes since the detailed calculations have just been developed in response to DOC comments after the close of the rate case record. Additionally, there could be a significant number of additional alternative apportionments that could be developed.

Table 4: New Alternative
Amounts shown in \$000s

Class	Non-Gas Revenue @ Present Rates	CCRC Test Year Revenue @ Present Rates	non-CIP Test Year Revenue @ Present Rates	New CCRC Increase	New non-CIP Increase	New CCRC	New non-CIP Non Gas Revenue	New Total Non Gas Revenue	column Z PCT of Total
(a)	(b)=(c)+(d)	(c)	(d)	(w)	(x)	(y)=(c)+(w)	(z)=(d)+(x)	(aa)=(y)+(z)	(ab)
Residential	186,132	4,277	181,855	8,003	17,856	12,280	199,711	211,991	68.1%
Comm A	8,064	148	7,916	277	746	425	8,662	9,087	3.0%
C/I Firm B	10,963	309	10,655	578	(442)	887	10,213	11,100	3.5%
C/I Firm C	40,022	1,465	38,557	2,741	(1,294)	4,206	37,263	41,469	12.7%
Sm D F A	11,423	624	10,799	1,167	-	1,791	10,799	12,590	3.7%
Sm D F B	6,939	433	6,506	811	(1)	1,244	6,505	7,749	2.2%
Lg Vol	21,274	1,335	19,939	2,498	-	3,833	19,939	23,772	6.8%
TOTAL	284,817	8,591	276,227	16,075	16,865	24,666	293,092	317,758	100.0%

As stated above, CenterPoint Energy continues to support the revenue apportionment used in the ALJ schedules and the Compliance filing. CenterPoint Energy has reviewed the DOC October 8 recommendations. As discussed above, CenterPoint Energy agrees with the overall recommendation to approve the Compliance filing, but has concerns with the recommendation related to revenue apportionment for the reasons stated above. Given the time needed to print bill inserts and other communication materials related to the new rates and rate design, CenterPoint Energy respectfully requests that the PUC consider this Compliance filing in a timely manner.

If you have any questions, please contact me at 612-321-4625.

Sincerely,

/s/

Peggy Sorum
 Manager, Regulatory Financial Activities

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TRADE SECRET INFORMATION HAS BEEN EXCISED

Attachment A of this filing has been marked "TRADE SECRET" and should not be disclosed to any party, other than parties having signed written Confidentiality Agreements in this proceeding, without the written consent of CenterPoint Energy. The information meets the definition of trade secret in Minn. Stat. 13.37 subd. 1(b) as follows: (1) the information was supplied by CenterPoint Energy, the affected organization; (2) CenterPoint Energy has taken all reasonable efforts to maintain the secrecy of the information, and (3) the protected information contains operating information which derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use.

CENTERPOINT ENERGY
 CALCULATION OF PRESENT AND FINAL AUTHORIZED BILLING RATE REVENUE BY CLASS
 Authorized \$32,943,000
ALTERNATIVE REVENUE APPORTIONMENT

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(a)	(b)	(c)	(d)	(e)		(f)	(g)	(h)		(i)	(j)
				Present Rates	Test-Year Revenues			Proposed Rates	Proposed Revenue		
1	SVDF A--Transport		Test-Year Units	Present Rates	Test-Year Revenues			Proposed Rates	Proposed Revenue		Revenue Change
2		Customer Bills	[Trade Secret Data Begins...				[Trade Secret Data Begins...				
3		Total Sales									
4		Total Revenue									
5											
6		Demand									
7		Commodity									
8		Cost of Gas									
9		Delivery Chrg B4 CIP									
10		CCRC									
11		Delivery Charge Total									
12		GAP									
13		Total Billing Rate									
14											
15											
16											
17											
18	SVDF A--System + Transport		Test-Year Units	Present Rates	Test-Year Revenues			Proposed Rates	Proposed Revenue		Revenue Change
19		Customer Bills	25,500		\$1,625,800	Customer Bills			\$1,370,800		-\$255,000
20		Total Sales	9,688,000		\$46,801,928	Total Sales			\$48,224,126		\$1,422,198
21		Total Revenue			\$48,427,728	Total Revenue			\$49,594,926		\$1,167,198

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(a)	Rate Class	(b)	(c)	(d)	(e)		(f)	(g)	(h)		(i)	(j)
					Test-Year Units	Present Rates			Test-Year Revenues	Proposed Rates		
	SVDF B--Sales Service											
1			Customer Bills	[Trade Secret Data Begins...]				Customer Bills	[Trade Secret Data Begins...]			
2			Total Sales					Total Sales				
3			Curtailment					Curtailment				
4			Total Revenue					Total Revenue				
5												
6			Demand					Demand				
7			Commodity					Commodity				
8			Cost of Gas					Cost of Gas				
9			Delivery Chrg B4 CIP					Delivery Chrg B4 CIP				
10			CCRC					CCRC				
11			Delivery Charge Total					Delivery Charge Total				
12			GAP					GAP				
13			Total Billing Rate					Total Billing Rate				
14												
15												
16												
17	SVDF B--Market Rate											
18												
19			Customer Bills	[Trade Secret Data Begins...]				Customer Bills	[Trade Secret Data Begins...]			
20			Total Sales					Total Sales				
21			Total Revenue					Total Revenue				
22												
23			Demand					Demand				
24			Commodity					Commodity				
25			Cost of Gas					Cost of Gas				
26			Delivery Chrg B4 CIP					Delivery Chrg B4 CIP				
27			CCRC					CCRC				
28			Delivery Charge Total					Delivery Charge Total				
29			GAP					GAP				
30			Total Billing Rate					Total Billing Rate				
31												
32												
33												
34	Total SVDF B--Service											
35												
36			Customer Bills	[Trade Secret Data Begins...]				Customer Bills	[Trade Secret Data Begins...]			
37			Total Sales					Total Sales				
38	(sum of SVDF-B-Sales Service +		Total Revenue					Total Revenue				
39	SVDF-B Market Rate)											

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(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)
Rate Class			Test-Year Units	Present Rates	Test-Year Revenues		Proposed Rates	Proposed Revenue	Revenue Change
1	Large Volume DF--Service								
2		Customer Bills	[Trade Secret Data Begins...]			Customer Bills	[Trade Secret Data Begins...]		
3		Total Sales	[Trade Secret Data Begins...]			Total Sales	[Trade Secret Data Begins...]		
4		Curtailement	[Trade Secret Data Begins...]			Curtailement	[Trade Secret Data Begins...]		
5		Total Revenue	[Trade Secret Data Begins...]			Total Revenue	[Trade Secret Data Begins...]		
6			[Trade Secret Data Begins...]				[Trade Secret Data Begins...]		
7		Demand	[Trade Secret Data Begins...]			Demand	[Trade Secret Data Begins...]		
8		Commodity	[Trade Secret Data Begins...]			Commodity	[Trade Secret Data Begins...]		
9		Cost of Gas	[Trade Secret Data Begins...]			Cost of Gas	[Trade Secret Data Begins...]		
10		Delivery Chrg B4 CIP	[Trade Secret Data Begins...]			Delivery Chrg B4 CIP	[Trade Secret Data Begins...]		
11		CCRC	[Trade Secret Data Begins...]			CCRC	[Trade Secret Data Begins...]		
12		Delivery Charge Total	[Trade Secret Data Begins...]			Delivery Charge Total	[Trade Secret Data Begins...]		
13		GAP	[Trade Secret Data Begins...]			GAP	[Trade Secret Data Begins...]		
14		Total Billing Rate	[Trade Secret Data Begins...]			Total Billing Rate	[Trade Secret Data Begins...]		
15			[Trade Secret Data Begins...]				[Trade Secret Data Begins...]		
16			[Trade Secret Data Begins...]				[Trade Secret Data Begins...]		
17	Large Volume DF--MR-Service								
18									
19		Customer Bills	[Trade Secret Data Begins...]			Customer Bills	[Trade Secret Data Begins...]		
20		Minimum Volume	[Trade Secret Data Begins...]			Minimum Volume	[Trade Secret Data Begins...]		
21		CIP Exempt Volumes	[Trade Secret Data Begins...]			CIP Exempt Volumes	[Trade Secret Data Begins...]		
22		Total Sales	[Trade Secret Data Begins...]			Total Sales	[Trade Secret Data Begins...]		
23		Curtailement	[Trade Secret Data Begins...]			Curtailement	[Trade Secret Data Begins...]		
24		Total Revenue	[Trade Secret Data Begins...]			Total Revenue	[Trade Secret Data Begins...]		
25			[Trade Secret Data Begins...]				[Trade Secret Data Begins...]		
26		Demand	[Trade Secret Data Begins...]			Demand	[Trade Secret Data Begins...]		
27		Commodity	[Trade Secret Data Begins...]			Commodity	[Trade Secret Data Begins...]		
28		Cost of Gas	[Trade Secret Data Begins...]			Cost of Gas	[Trade Secret Data Begins...]		
29		Delivery Chrg B4 CIP	[Trade Secret Data Begins...]			Delivery Chrg B4 CIP	[Trade Secret Data Begins...]		
30		CCRC	[Trade Secret Data Begins...]			CCRC	[Trade Secret Data Begins...]		
31		Delivery Charge Total	[Trade Secret Data Begins...]			Delivery Charge Total	[Trade Secret Data Begins...]		
32		GAP	[Trade Secret Data Begins...]			GAP	[Trade Secret Data Begins...]		
33		Total Billing Rate	[Trade Secret Data Begins...]			Total Billing Rate	[Trade Secret Data Begins...]		
34			[Trade Secret Data Begins...]				[Trade Secret Data Begins...]		
35			[Trade Secret Data Begins...]				[Trade Secret Data Begins...]		
36	Total Large Volume DF								
37									
38	Sales Service + Market Rate	Customer Bills	[Trade Secret Data Begins...]			Customer Bills	[Trade Secret Data Begins...]		
39		Minimum Volume	[Trade Secret Data Begins...]			Minimum Volume	[Trade Secret Data Begins...]		
40		CIP Exempt Volumes	[Trade Secret Data Begins...]			CIP Exempt Volumes	[Trade Secret Data Begins...]		
41		Total Sales	[Trade Secret Data Begins...]			Total Sales	[Trade Secret Data Begins...]		
42		Total Revenue	[Trade Secret Data Begins...]			Total Revenue	[Trade Secret Data Begins...]		
43			[Trade Secret Data Begins...]				[Trade Secret Data Begins...]		

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 \$0.0659

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(a)	Rate Class (b)	(c)	(d)	(e)		(f)	(g)	(h)		(i)	(j)
				Test-Year Units	Present Rates			Test-Year Revenues	Proposed Rates		
	Large Volume DF--Transport										
1		Customer Bills	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
2		Minimum Volume	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
3		Total Sales	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
4		Curtailment	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
5		Total Revenue	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
6			[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
7		Demand	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
8		Commodity	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
9		Cost of Gas	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
10		Delivery Chrg B4 CIP	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
11		CCRC	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
12		Delivery Charge Total	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
13		GAP	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
14		Total Billing Rate	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
15			[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
16			[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
17	Large Volume DF- MR- Transport										
18											
19		Customer Bills	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
20		Minimum Volume	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
21		CIP Exempt Volumes	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
22		Total Sales	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
23		Curtailment	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
24		Total Revenue	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
25			[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
26		Demand	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
27		Commodity	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
28		Cost of Gas	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
29		Delivery Chrg B4 CIP	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
30		CCRC	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
31		Delivery Charge Total	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
32		GAP	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
33		Total Billing Rate	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
34			[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
35			[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
36	Total Large Volume DF Transport										
37											
38		Customer Bills	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
39		Minimum Volume	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
40	(DF Transport + MR Transport)	CIP Exempt Volumes	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
41		Total Sales	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
42		Total Revenue	[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				
43			[Trade Secret Data Begins...]				[Trade Secret Data Begins...]				

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(a)	(b)	(c)	(d)	(e)		(f)	(g)	(h)		(i)	(j)
				Test-Year Units	Present Rates			Test-Year Revenues	Proposed Rates		
	Large Volume Firm Transport										
1		Customer Bills	[Trade Secret Data Begins...]					[Trade Secret Data Begins...]			
2		Demand Delivery	[Trade Secret Data Begins...]					[Trade Secret Data Begins...]			
3		CIP Exempt Volumes	[Trade Secret Data Begins...]					[Trade Secret Data Begins...]			
4		Total Sales	[Trade Secret Data Begins...]					[Trade Secret Data Begins...]			
5		Total Revenue	[Trade Secret Data Begins...]					[Trade Secret Data Begins...]			
6			[Trade Secret Data Begins...]					[Trade Secret Data Begins...]			
7		Demand	[Trade Secret Data Begins...]					[Trade Secret Data Begins...]			
8		Commodity	[Trade Secret Data Begins...]					[Trade Secret Data Begins...]			
9		Cost of Gas	[Trade Secret Data Begins...]					[Trade Secret Data Begins...]			
10		Delivery Chrg B4 CIP	[Trade Secret Data Begins...]					[Trade Secret Data Begins...]			
11		CCRC	[Trade Secret Data Begins...]					[Trade Secret Data Begins...]			
12		Delivery Charge Total	[Trade Secret Data Begins...]					[Trade Secret Data Begins...]			
13		GAP	[Trade Secret Data Begins...]					[Trade Secret Data Begins...]			
14		Total Billing Rate	[Trade Secret Data Begins...]					[Trade Secret Data Begins...]			
15			[Trade Secret Data Begins...]					[Trade Secret Data Begins...]			
16			[Trade Secret Data Begins...]					[Trade Secret Data Begins...]			
17			[Trade Secret Data Begins...]					[Trade Secret Data Begins...]			
18		Total Large Volume Transport & Service	Test-Year Units	Present Rates	Test-Year Revenues		Proposed Rates	Proposed Revenue	Revenue Change		
19		Customer Bills	2,964		\$1,908,000			\$2,500,800	\$592,800		
20		Demand Del/Min. Vol.			\$8,781,733			\$8,781,733	\$0		
21		CIP Exempt Vols	25,802,756								
22		Total Sales (aft Curtailment)	46,533,261		<u>\$51,932,893</u>			<u>\$53,837,701</u>	<u>\$1,904,808</u>		
23		Total Revenue			<u>\$62,622,626</u>			<u>\$65,120,234</u>	<u>\$2,497,608</u>		

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 Trade Secret Data has been Excised

(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)
Rate Class				Present Rates			Proposed Rates		Revenue Change
		Test-Year Units		Present Rates	Test-Year Revenues		Proposed Rates	Proposed Revenue	
1	Total System Results								
2	Customer Bills	9,872,556			\$93,317,329	Customer Bills		\$108,957,685	\$15,640,356
3	Demand Del/Min. Vol.				\$8,781,733	Demand Del/Min. Vol.		\$8,781,733	\$0
4	CIP Exempt Volumes	25,802,756				CIP Exempt Volumes			
5	Total Sales (aft Curtail)	159,203,861			\$743,294,996	Total Sales		\$760,593,990	\$17,298,994
6	Total Revenue				\$845,394,058	Total Revenue		\$878,333,409	\$32,939,350
7	Demand	159,203,861			\$74,038,731	Demand		\$74,038,731	\$0
8	Commodity	159,203,861			\$486,537,617	Commodity		\$486,537,617	\$0
9	Cost of Gas	159,203,861			\$560,576,347	Cost of Gas		\$560,576,347	\$0
10	Delivery Chrg B4 CIP	159,203,861			\$169,411,162	Delivery Chrg B4 CIP		\$170,356,186	\$945,024
11	CCRC	133,401,105			\$8,591,031	CCRC		\$24,665,864	\$16,074,833
12	Delivery Charge Total	159,203,861			\$178,002,193	Delivery Charge Total		\$195,022,050	\$17,019,857
13	GAP	96,254,200			\$4,716,456	GAP		\$4,995,593	\$279,137
14	Total Revenue	159,203,861			\$743,294,996	Total Billing Rate		\$760,593,990	\$17,298,994
15									
16									
17		Natural Gas System Revenue			\$826,548,008			\$857,666,218	\$31,118,210
18		Transport Revenue			\$18,846,050			\$20,667,190	\$1,821,140
19		Total Revenue			\$845,394,058			\$878,333,409	\$32,939,350
20									
21		Net Margin Revenue 1/			\$284,817,711			\$317,757,061	\$32,939,350
22									
23		Volumetric Margin Revenue 2/			\$191,500,382			\$208,799,376	\$17,298,994
24									
25									
26									

1/ incl Basic, Delivery, CCRC, GAP and Demand/Min Vol
 2/ incl Delivery, CCRC, GAP and Demand/Min Vol. Does NOT include Basic Charge Revenue

AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

Mary Jo Schuh, being first duly sworn on oath, deposes and says she served the attached Reply Comments in Docket No. G-008/GR-13-316 via e-filing to the Minnesota PUC and DOC, as well as all other parties on the attached Service List.

 /s/ _____
Mary Jo Schuh

Subscribed and sworn to before me
this 20th day of October, 2014.

 /s/ _____
Linda Baumann, Notary Public
My Commission expires 1/31/15

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street Minneapolis, MN 554024629	Electronic Service	Yes	OFF_SL_13-316_Official CC Service List
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_13-316_Official CC Service List
Brenda A.	Bjorklund	brenda.bjorklund@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave FL 14 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-316_Official CC Service List
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_13-316_Official CC Service List
Jerry	Dasinger	jerry.dasinger@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_13-316_Official CC Service List
Jeffrey A.	Daugherty	jeffrey.daugherty@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-316_Official CC Service List
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, BRM Tower St. Paul, MN 55101	Electronic Service 1400	Yes	OFF_SL_13-316_Official CC Service List
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_13-316_Official CC Service List
Robert	Harding	robert.harding@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_13-316_Official CC Service List
Mary	Holly	mholly@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-316_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_13-316_Official CC Service List
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_13-316_Official CC Service List
Peter	Madsen	peter.madsen@ag.state.mn.us	Office of the Attorney General-DOC	Bremer Tower, Suite 1800 445 Minnesota Street St. Paul, Minnesota 55101	Electronic Service	Yes	OFF_SL_13-316_Official CC Service List
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_13-316_Official CC Service List
Karen	Olson	karen.olson@ag.state.mn.us	Office of the Attorney General-RUD	1400 Bremer Tower 445 Minnesota St St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_13-316_Official CC Service List
LauraSue	Schlatter	LauraSue.Schlatter@state.mn.us	Office of Administrative Hearings	600 North Robert Street St. Paul, Minnesota 55101	Paper Service	Yes	OFF_SL_13-316_Official CC Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	Ste 122 9100 W Bloomington Frwy Bloomington, MN 55431	Paper Service	Yes	OFF_SL_13-316_Official CC Service List
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	800 LaSalle Avenue PO Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_13-316_Official CC Service List
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-316_Official CC Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	Yes	OFF_SL_13-316_Official CC Service List