



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

December 22, 2015

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

**VIA E-FILING**

**RE: Petition of CenterPoint Energy for Approval of an Extension of Rule  
Variances to Minnesota Rules to Recover the Costs of Certain Natural Gas  
Financial Instruments Through the Purchased Gas Adjustment Clause  
G-008/M-12-166  
G-008/M-15-912**

Dear Mr. Wolf:

On October 12, 2015, CenterPoint Energy (the "Company") petitioned for an extension of rule variances to Minnesota Rules to recover the costs of certain natural gas financial instruments through the Purchased Gas Adjustment (the "PGA").

On December 11, 2015, the Department of Commerce, Division of Energy Resources (the "Department") filed Comments regarding the Company's petition. The Department recommends that the Minnesota Public Utilities Commission extend CenterPoint Energy's variance to Minnesota Rules parts 7825.2400, 7825.2500, and 7825.2700, subject to reporting requirements, and allow the Company to recover certain costs associated with financial hedging instruments through the monthly PGA.

The Company appreciates the analysis and Comments provided by the Department and supports the recommendation outlined in the Department's analysis.

If you have any questions or require additional information, please contact me at 612.321.4677 or [Kevin.Marquardt@CenterPointEnergy.com](mailto:Kevin.Marquardt@CenterPointEnergy.com).

Sincerely,

/s/

Kevin Marquardt  
Regulatory Analyst  
Regulatory Services

Enclosures  
cc: Service List

AFFIDAVIT OF SERVICE

**G-008/M-12-166**

**G-008/M-15-912**

STATE OF MINNESOTA    )  
  ) ss.  
COUNTY OF HENNEPIN    )

Kevin D. Marquardt, being first duly sworn on oath, deposes and says he served the foregoing document on the attached list of persons by e-filing and depositing a true and correct copy thereof, with postage paid in the United States mail at City of Minneapolis, Minnesota.

/s/  
Kevin D. Marquardt, Regulatory Analyst

Subscribed and sworn to before me  
This 22<sup>nd</sup> day of December, 2015

/s/  
Mary Jo Schuh  
Notary Public

My Commission Expires 1/31/20

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