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June 28, 2024

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

**Re: In the Matter of a Commission Investigation into Gas Utility Resource Planning
Docket No. G008,G002,G011/CI-23-117**

**In the Matter of a Commission Evaluation of Changes to Natural Gas Utility
Regulatory and Policy Structures to Meet Greenhouse Gas Reduction Goals
Docket No. G999/CI-21-565**

INITIAL COMMENTS OF CENTERPOINT ENERGY MINNESOTA GAS

Dear Mr. Seuffert:

Pursuant to the Minnesota Public Utilities Commission’s (“the Commission”) May 7, 2024, Extended Notice of Comment Period (“Notice”) in the above-captioned dockets, CenterPoint Energy Minnesota Gas (“CenterPoint Energy” or “the Company”) filed a Straw Proposal regarding additional filing requirements for gas utility resource planning in Minnesota on May 31, 2024. Subsequent to this filing, CenterPoint Energy engaged in some discussions with parties through roundtables organized by Great Plains Institute (“GPI”) and offers some clarifications on certain aspects of its Straw Proposal Comments.

Resource Expansion or New Resources Above a \$15 Million Threshold

Firstly, regarding Order Points 51 and 54 in the Commission’s March 27, 2024, Order in these dockets, parties were interested in understanding the number of significant projects that CenterPoint Energy would have historically submitted using the \$15 million threshold amount for resource expansion or new resource projects based on the definitions utilities provided in their May 31, 2024, Straw Proposals. In addition, parties were interested in the number of total individual projects that would qualify using \$1 million, \$3 million, \$5 million and \$10 million as the minimum project threshold amounts. Below, in Table 1, please see the number of projects from 2018 to 2023 that would have qualified for the respective threshold amounts.

Table 1

Project Threshold	\$1 million	\$3 million	\$5 million	\$10 million	\$15 million
Number of Projects	15	5	4	4	4

Load Forecast

Secondly, at the June 18, 2024, roundtable organized by GPI, there was discussion regarding how CenterPoint Energy viewed forecasting going forward in connection with the Company’s

proposed Order Point 40.a., as reiterated below, as well as how the Company foresees alternative resources will be taken into consideration.

40.a. Where the high load forecast may represent the Company's forecast for design day as provided in their most recent demand entitlement filing, and sales forecast as provided in the most recent rate case.

It is important to note that CenterPoint Energy is not proposing to restrict forecasting methodologies to current rate cases or demand entitlement filings, but instead is advocating for forecasting consistency across all dockets. If the methodologies evolve over time through a particular docket's process, the proposal would be for subsequent dockets to follow the same methodology for a consistent approach.

In the discussion regarding proposed Order Point 40.a. there were some questions about how the current forecasting provided in rate cases and demand entitlements, which are typically one-to-two-year horizon planning periods, would work with the 5-year horizon of the gas Integrated Resource Plan ("IRP").

When discussing consistency for sales forecasting across dockets, the Company is looking primarily at the short-term forecasting method used in rate cases. This forecasting methodology for CenterPoint Energy has historically used rate class specific short term focused multiple regression econometric models, a method which has been used to set rates for several rate cases and has been accepted for use by the Commission. However, when looking into longer term forecasts of the gas IRP, beyond the rate case test and plan years, CenterPoint would introduce longer term models which could take into account longer term-focused economic and demographic influences (local, state, regional and national as appropriate) using independent third party forecasts, more efficient appliance end-use saturation surveys, customer/household forecasts, technical and economic potential for next generation gas equipment, potential for fuel switching in the larger industrial classes and the use of 10-, 15- and 20-year weather normal to develop high, mid-range and low growth scenarios. CenterPoint Energy will continue to utilize its current short term forecast methodology for test year projections but the Company will then transition its longer-term scenario forecasts using a modelling structure that has the capability to account for longer term effects.

Demand forecasting for CenterPoint Energy's current design day in the annual demand entitlement filings reflects a 5-year period. Therefore, the Company believes using the same forecasting methodologies between the two dockets is workable and will provide consistent results for decision making.

Regarding alternative resources, CenterPoint Energy envisions the discussion of forecasted resources will take place in two separate areas of the gas IRP filing. First, as discussed in the Company's proposed Order Point 40.a., CenterPoint Energy intends to use currently utilized forecast methodologies to set the high-demand forecast. The medium- and low-demand forecasts will then take into consideration various levels of demand side projects such as electrification and Energy Conservation and Optimization projects. Second, the Company will provide a menu of supply side projects such as transmission pipeline capacity additions, storage, renewable natural gas, hydrogen, distribution system looping, and peaking units to meet the various load forecast scenarios.

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Please feel free to contact me at 612-393-6216, seth.demerritt@centerpointenergy.com, or emily.suppes@centerpointenergy.com, 612-321-5363, with any questions.

Sincerely,

/s/ Seth DeMerritt

Manager, Regulatory and Rates

/s/ Emily Suppes

Director, Regulatory Affairs

Attachment

C: Service Lists

CERTIFICATE OF SERVICE

On Friday, June 28, 2024, Melodee Carlson Chang certifies that she served the attached Initial Comments of CenterPoint Energy in Docket Nos. G008,G002,G011/CI-23-117 and G999/CI-21-565 to all persons at the addresses indicated on the attached service lists by having the document delivered via electronic filing, or if indicated, via U.S. Mail.

/s/ Melodee Carlson Chang

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-565_Official Service List
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