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Minneapolis, MN 55459-0038

**PUBLIC DOCUMENT**  
**Trade Secret Information Excised**

October 31, 2025

Ms. Sasha Bergman  
Executive Secretary  
Minnesota Public Utilities Commission 350  
Metro Square Building  
121 East Seventh Place, Suite 350  
St. Paul, Minnesota 55101-2147

**Re: CenterPoint Energy 's Request for Change in Demand Units, Supplemental Filing  
Docket No. G008/M-25-72**

Dear Ms. Bergman:

On April 1, 2025, in Docket No. 25-72, the Company requested 1) approval of demand charges associated with the storage partnership with ANR Pipeline Company ("ANR"); 2) approval of demand charges associated with the entitlement it was awarded in the open season for Carlton South Generally Available capacity in February 2025 effective April 1, 2025; 3) approval of demand charges associated with the 2025 Northern Lights election; 4) approval of demand charges associated with the replacement of its Marketer Storage agreement awarded by Request for Proposal in August 2024 effective May 1, 2025; 5) approval of demand charges associated with the storage partnership transaction between Tenaska Gas Storage, LLC ("Tenaska") and East Cheyenne Gas Storage, LLC ("East Cheyenne") for firm storage services effective April 1, 2025, to March 31, 2028; 6) a \$2.00 rounding update for Northern Natural Gas ("NNG") FDD storage; and 7) November 1, 2025, updated seasonal reservation charges for swing gas supplies and may also supplement if additional capacity is acquired through capacity release. The Company will also request approval of the renewal contract with Viking.

Seasonal Reservation fees:

In the present filing, CenterPoint Energy has updated the Supplier Demand / Seasonal Swing Reservation for the 2025-2026 Winter season, which was unknown at the time of the April 1 Petition.

CenterPoint Energy updated its annual Supplier Demand Profile, which contains contracts for seasonal swing supplies. These expenses are incurred regardless of how much gas is called upon over the winter season, and costs are allocated 75% to Demand and 25% to Commodity. Changes will be reflected in the Company's November 2025 Purchased Gas Adjustment billing rates.

Viking Contract:

CenterPoint Energy renewed its Viking max rate contracts that expired on 10/31/2025. The new contracts run through 10/31/2030. The renewal did not impact the rates, as they are max rate contracts and will only change during a FERC approved rate case.

Viking provides upstream supply transportation to Northern Natural and MIPC, as well as supply

transportation directly to a few small delivery points into CERC's distribution system. Since CERC obtained Viking capacity dating back to 2017, the capacity has proven to be a valuable component of the supply portfolio for various reasons:

- Achieves supply diversity by holding capacity on a pipeline besides Northern Natural,
- Introduces price diversity with purchases being tied to the Nymex or Emerson price point,
- Allows the Company increased utilization of the MIPC/South Cambridge delivery,
- Helps CERC meet reserve margin needs due to continued customer growth,
- Capacity release and/or AMA opportunities associated with the unutilized capacity during summer months.

Northern Rate Case:

As mentioned in the April 1, 2025, filing, Northern Natural Gas (NNG) is currently in a rate case proceeding. So, the Company is unable to provide an Exhibit A with accurate updated rates. The filed rates become effective on January 1, 2026, but final rates will not be known until the rate case concludes. The impact of NNG's rate case can be found in Schedule D of the January 2026 PGA filing.

Customer Impact:

The overall annual demand costs have increased about \$6,500,000 when compared to the annual demand costs that were effective October 2025. There was approximately \$6 million added to annual costs from the ANR contracts. There was approximately \$500,000 added to annual costs from seasonal swing reservation. The customer bill impact has decreased from \$1.5463/Dth to \$1.5333/Dth, or about \$0.0130/Dth. Annually for a residential customer using 89.0 Dekatherms, residential customers would see a \$1.16 decrease as of Nov. 1, 2025. The Company updated the annual small firm demand volume from the 2023 Rate Case (Plan Year) and updated the design day that was submitted May 29, 2025, as part of this docket. The updated numbers lowered the small firm demand rate.

Estimate of Annual Demand Costs

October	89.0 x \$1.5463 =	\$137.62 per year before "smoothing" adjustment
November	89.0 x \$1.5333 =	\$136.46 per year before "smoothing" adjustment
Difference		\$1.16 per year

**CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas has designated information in this document as trade secret. Specifically, Exhibit A, pages 1 and 2, and Exhibit C.** 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, including protecting it from disclosure in this document; and (3) the protected information contains gas supply contract 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.

Please contact me at (612) 321-4677 if you have any questions.

Sincerely,

/s/ Donald W. Wynia

Regulatory Analyst

[Donald.Wynia@CenterPointEnergy.com](mailto:Donald.Wynia@CenterPointEnergy.com)

**CERTIFICATE OF SERVICE**

Donald Wynia served the above Request for Change in Demand for 2025-2026 (Docket No. G-008/M-25-72 Supplement) to all persons at the addresses indicated on the attached list by having the document delivered by electronic filing.

/s/

Donald Wynia  
Regulatory Analyst, Regulatory Services  
CenterPoint Energy

Date: October 31, 2025

**Filing Upon a Change in Demand  
Minn. Rule 7829.1300, Subp. 2**

**CenterPoint Energy Summary of Exhibits**

**EXHIBIT A**      Page 1      \*Annual Demand Cost Calculation - Effective October 1, 2025  
Page 2      \*Annual Demand Cost Calculation – Effective November 1, 2025

**EXHIBIT B**      Additional Information Request from the Department of Commerce  
Additional information pursuant to the Department's request to all utilities  
concerning demand entitlement changes dated October 1, 1993.

B3              \*Revised – Demand Profile  
B4              Revised - Historic gas price change comparisons – Bill Impact

**EXHIBIT C**      Supporting documentation  
Page 1 - \*Swing Supply Premium / Reservation

NOTE: “\*” denotes Non-Public Document

Demand Summary

Rows marked with an "X" are considered Trade Secret	Pipeline	Contract Type	Season	Rate Type	(DTH)	RATE	Number of Mo.	Annual Cost	Contract Start Date	Contract End Date	Contract Number
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		Filed June 2023	Filed November 2023	Filed April 2024	Filed November 2024	Filed April 1, 2025	November 1, 2025	Change from April 1, 2025
	PipelineContract TypeSeasonRate Type	23-221	23-221	24-146	24-146	25-72	25-72	
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61	Total Capacity	1,551,692	1,541,787	1,569,730	1,569,730	1,569,790	1,584,790	15,000
62	Total Peak-Shaving Capacity/On-line Storage	271,000	271,000	271,000	271,000	271,000	276,000	5,000
63	Total Annual Transportation (12 month)	871,477	865,534	871,477	871,477	871,537	880,537	9,000
64	Total Seasonal Transportation (Adj for NNG/Viking overlap)	1,280,692	1,270,787	1,298,730	1,298,730	1,298,790	1,308,790	10,000
65	Peak Shaving as % of Total Capacity	17.5%	17.6%	17.3%	17.3%	17.3%	17.4%	0
66	Annual Transportation as % of Total Capacity	56.2%	56.1%	55.5%	55.5%	55.5%	55.6%	0
67	Seasonal Transportation as % of Total Capacity	82.5%	82.4%	82.7%	82.7%	82.7%	82.6%	(0)
68	Annual and Seasonal Transportation as % of Total Transportation	59.5%	59.5%	59.8%	59.8%	59.8%	59.8%	(0)
69								
70	Design Day	1,500,450	1,500,450	1,521,300	1,521,300	1,544,100	1,544,100	0
71	Physical Res	36,000	36,000	36,000	36,000	36,000	36,000	0
72	Total	1,536,450	1,536,450	1,557,300	1,557,300	1,580,100	1,580,100	0
73								
74	Pipeline	1,280,692	1,270,787	1,298,730	1,298,730	1,298,790	1,308,790	10,000
75	Peaking (LNG, Propane, Waterville)	271,000	271,000	271,000	271,000	271,000	276,000	5,000
76	Net Supply	1,551,692	1,541,787	1,569,730	1,569,730	1,569,790	1,584,790	15,000
77								
78	Avail Net Cap	15,242	5,337	12,430	12,430	(10,310)	4,690	15,000
79	%	1.0%	0.3%	0.8%	0.8%	-0.7%	0.3%	0.9%
80								
81	Avail incl Physical	51,242	41,337	48,430	48,430	25,690	40,690	15,000
82	%	3.4%	2.8%	3.2%	3.2%	1.7%	2.6%	1.0%



	Last Rate Case (G008/GR-23-173)	Last Demand Change May 1, 2025 (G008/M-25-72)	October 1, 2025 - PGA	November 1, 2025 Demand Change (G008/M-25-72)	Change From Last Rate Case	Change From Last Demand Change	Percent Change (%) From Most Recent PGA	Change (\$) From Prior Demand
<b>Residential</b>								
Commodity Cost of Gas (WACOG) (4)	\$4.6662	\$3.2671	\$2.4332	\$3.4305	-26.48%	5.00%	40.99%	\$0.9973
Demand Cost of Gas (1)	\$1.3399	\$1.5463	\$1.5463	\$1.5333	14.43%	-0.84%	-0.84%	(\$0.0130)
Commodity Margin (2) (3) (5)	\$3.5174	\$2.9797	\$3.5174	\$3.5174	0.00%	18.05%	0.00%	\$0.0000
Total Cost of Gas	\$9.5235	\$6.9751	\$7.4969	\$8.4812	-10.94%	21.59%	13.13%	\$0.9843
Average Annual Usage (Dk)	89	89	89	89				
Average Annual Total Cost of Gas	\$844.73	\$620.78	\$664.98	\$754.83	-10.64%	21.59%	13.51%	\$89.8518
Average Annual Total Demand Cost of Gas								(\$1.1570)

	Last Rate Case (G008/GR-23-173)	Last Demand Change May 1, 2025 (G008/M-25-72)	October 1, 2025 - PGA	November 1, 2025 Demand Change (G008/M-25-72)	Change From Last Rate Case	Change From Last Demand Change	Percent Change (%) From Most Recent PGA	Change (\$) From Prior Demand
<b>Commercial/Industrial Firm - A</b>								
Commodity Cost of Gas (WACOG) (4)	\$4.6662	\$3.2671	\$2.4332	\$3.4305	-26.48%	5.00%	40.99%	\$0.9973
Demand Cost of Gas (1)	\$1.3399	\$1.5463	\$1.5463	\$1.5333	14.43%	-0.84%	-0.84%	(\$0.0130)
Commodity Margin (2) (3) (5)	\$4.4584	\$3.9696	\$4.4584	\$4.4584	0.00%	12.31%	0.00%	\$0.0000
Total Cost of Gas	\$10.4645	\$8.7830	\$8.4379	\$9.4222	(\$0.0996)	7.28%	11.67%	98.43%
Average Annual Usage (Dk)	80	80	80	80				
Average Annual Total Cost of Gas	\$836.11	\$701.76	\$674.19	\$752.83	-9.96%	7.28%	11.67%	\$78.6456
Average Annual Total Demand Cost of Gas								(\$1.04)

	Last Rate Case (G008/GR-23-173)	Last Demand Change May 1, 2025 (G008/M-25-72)	October 1, 2025 - PGA	November 1, 2025 Demand Change (G008/M-25-72)	Change From Last Rate Case	Change From Last Demand Change	Percent Change (%) From Most Recent PGA	Change (\$) From Prior Demand
<b>Commercial/Industrial Firm - B</b>								
Commodity Cost of Gas (WACOG) (4)	\$4.6662	\$3.2671	\$2.4332	\$3.4305	-26.48%	5.00%	40.99%	\$0.9973
Demand Cost of Gas (1)	\$1.3399	\$1.5463	\$1.5463	\$1.5333	14.43%	-0.84%	-0.84%	(\$0.0130)
Commodity Margin (2) (3) (5)	\$3.4497	\$2.5490	\$3.4497	\$3.4497	0.00%	35.34%	0.00%	\$0.0000
Total Cost of Gas	\$9.4558	\$7.3624	\$7.4292	\$8.4135	-11.02%	14.28%	13.25%	98.43%
Average Annual Usage (Dk)	294	294	294	294				
Average Annual Total Cost of Gas	\$2,780.01	\$2,164.55	\$2,184.18	\$2,473.57	-11.02%	14.28%	13.25%	\$289.3842
Average Annual Total Demand Cost of Gas								(\$3.82)

	Last Rate Case (G008/GR-23-173)	Last Demand Change May 1, 2025 (G008/M-25-72)	October 1, 2025 - PGA	November 1, 2025 Demand Change (G008/M-25-72)	Change From Last Rate Case	Change From Last Demand Change	Percent Change (%) From Most Recent PGA	Change (\$) From Prior Demand
<b>Commercial/Industrial Firm - C</b>								
Commodity Cost of Gas (WACOG) (4)	\$4.6662	\$3.2671	\$2.4332	\$3.4305	-26.48%	5.00%	40.99%	\$0.9973
Demand Cost of Gas (1)	\$1.3399	\$1.5463	\$1.5463	\$1.5333	14.43%	-0.84%	-0.84%	(\$0.0130)
Commodity Margin (2) (3) (5)	\$3.0220	\$2.0124	\$3.0220	\$3.0220	0.00%	50.17%	0.00%	\$0.0000
Total Cost of Gas	\$9.0281	\$6.8258	\$7.0015	\$7.9858	-11.55%	16.99%	14.06%	98.43%
Average Annual Usage (Dk)	1,805	1,805	1,805	1,805				
Average Annual Total Cost of Gas	\$16,295.72	\$12,320.57	\$12,637.71	\$14,414.37	-11.55%	16.99%	14.06%	\$1,776.66
Average Annual Total Demand Cost of Gas								(\$23.46)

	Last Rate Case (G008/GR-23-173)	Last Demand Change May 1, 2025 (G008/M-25-72)	October 1, 2025 - PGA	November 1, 2025 Demand Change (G008/M-25-72)	Change From Last Rate Case	Change From Last Demand Change	Percent Change (%) From Most Recent PGA	Change (\$) From Prior Demand
<b>Large General Service</b>								
Commodity Cost of Gas (WACOG) (4)	\$4.6662	\$3.2671	\$2.4332	\$3.4305	-26.48%	5.00%	40.99%	\$0.9973
Commodity Margin (2) (3) (5)	\$1.5717	\$1.0807	\$1.5717	\$1.5717	0.00%	45.43%	0.00%	\$0.0000
Commodity Charges	\$6.2379	\$4.1170	\$4.0049	\$5.0022	-19.81%	21.50%	24.90%	\$0.9973
LV Demand Cost of Gas (1)	\$12.3480	\$16.2259	\$16.2259	\$16.3159	32.13%	0.55%	0.55%	\$0.0900
LV Demand Delivery Charge	\$6.3303	\$6.3303	\$6.3303	\$6.3303	0.00%	0.00%	0.00%	\$0.0000
Average Annual Usage (Dk)	63,971	63,971	63,971	63,971				
Average Daily MDQ Usage (Dk)	8,448	7,150	7,150	7,150				-
Average Annual Total Cost of Gas	\$556,839	\$423,966	\$417,474	\$481,916		13.67%	15.44%	\$64,441.78
Average Annual Total Demand Cost of Gas								\$643.50

<b>Summary</b>	Commodity	Demand	Demand	Demand		Total	Total
Change from most recent PGA	Change	Change	Change	Change		Change	Change
Customer Class	(\$/Dk)	(Percent)	(\$/DK)	(\$/DK)		(\$/Dk)	(Percent)
Residential	\$0.9973	-0.84%	-\$0.0130	\$0.0000		\$89.85	13.51%
Commercial/Industrial Firm A	\$0.9973	-0.84%	-\$0.0130	\$0.0000		\$78.65	11.67%
Commercial/Industrial Firm B	\$0.9973	-0.84%	-\$0.0130	\$0.0000		\$289.38	13.25%
Commercial/Industrial Firm C	\$0.9973	-0.84%	-\$0.0130	\$0.0000		\$1,776.66	14.06%
Large General Service	\$0.9973	0.55%	\$0.0900	\$0.0000		\$64,441.78	15.44%

(1) Does not include Demand Smoothing Adjustment  
(2) Does not reflect Decoupling, GAP, Interim or GCR Factors.  
(3) 2023 Rate Case - tariff value for Last Rate Case and Last Demand Change. Reflect base rate plus CCRA  
(4) Actual WACOG for historical timeframes / 2023 Rate Case Base value in Settlement  
(5) Actual Billed for historical (Base+CCRA) / 2023 Rate Case Base settled tariff value and CCRA



