

November 20, 2023

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, Minnesota 55101-2147

**RE: Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. G008/MR-23-174

Dear Mr. Seuffert:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

A Petition by CenterPoint Energy Gas Resources Corp., d/b/a CenterPoint Energy Minnesota Gas (CPE, CenterPoint, or the Company) for Approval of a New Base Cost of Gas for Interim Rates.

The Petition was filed on November 1, 2023 by Donald Wynia, Regulatory Analyst for CenterPoint Energy Minnesota Gas.

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve as modified herein** CenterPoint's base cost of gas filing. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/LOUISE MILTICH  
Assistant Commissioner of Regulatory Analysis

/s/ SACHIN SHAH  
Rates Analyst

LM/SS/ar  
Attachment



## Before the Minnesota Public Utilities Commission

### Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. G008/MR-23-174

#### I. INTRODUCTION

CenterPoint Energy Gas Resources Corp., doing business as CenterPoint Energy Minnesota Gas (CPE, CenterPoint, or the Company), requests that the Minnesota Public Utilities Commission (Commission) approve a new base cost of gas (BCOG) to coincide with the proposed January 1, 2024 implementation of interim rates as requested in its general rate case in Docket No. G008/GR-23-173 (Docket 23-173). The application in Docket 23-173 is CPE's first multi-year rate plan (with a test year and plan year) filing and CenterPoint filed its general rate case on November 1, 2023, the same day as its BCOG Petition. The Minnesota Department of Commerce, Division of Energy Resources' (Department) analysis of CenterPoint's Petition is presented below.

#### II. DEPARTMENT'S ANALYSIS

Minnesota Rule 7825.2700, subpart 2, requires a utility to petition for a new base cost of gas, submitted as a miscellaneous rate change, to coincide with the implementation of interim rates during a general rate proceeding. This Rule requires that "The base cost of gas must separately state the commodity base cost and the demand base cost components for each class." Through its review of CenterPoint's Petition, and for the Petition's consistency with the calculations in the general rate case, the Department concludes that the Company has complied with these requirements through its Volume 1 – General Rate Petition and Summary of Filing, Schedules A through F<sup>1</sup>, and the testimony, exhibits, workpapers, and associated schedules of Company witnesses Nicole A Gilcrease (Exhibit \_\_\_ (NAG-D) and Seth S DeMerritt (Exhibit \_\_\_ (SSD-D), in its rate case filing; and through its supporting data and calculations provided in Exhibit E, Attachments 2 through 5 in the Petition. The Department discusses CenterPoint's demand and commodity costs separately below.

##### A. DEMAND GAS COSTS

The Department reviewed CenterPoint's Petition for consistency with the calculations in the rate case. The Department's analysis indicates that the information is generally consistent between the rate case and the base cost of gas filing with a minor rounding difference.<sup>2</sup> CenterPoint calculated its demand cost of gas based on the demand entitlement units and costs, filed on May 31, 2023 in Docket No. G008/M-23-221 (Docket 23-221), that are estimated to be charged beginning in the Company's

<sup>1</sup> Volume 1 is available in eDockets in Docket No. G008/GR-23-173, Document ID 202311-200106-01.

<sup>2</sup> In the Petition at Exhibit E, the total demand costs are approximately \$167,469,152 and in the rate case for example in Direct Testimony of Seth S DeMerritt (Exhibit \_\_\_ (SSD-D), Schedule 16; however, the total demand costs embedded in the calculations in Volume 1 – Financial Information, Schedule E-2 are approximately \$167,468,900, resulting in a difference of \$252. Volume 1 is available in eDockets in Docket No. G008/GR-23-173, Document ID 202311-200106-01.

November 2023 Purchased Gas Adjustment (PGA) filings.<sup>3</sup> The Department notes that the Company has also used the design-day from Docket 23-221. The Department does not assess the Company's filings in Docket 23-221 at this time; rather they will be evaluated and addressed when the Department files its comments in Docket 23-221, at a later date.

The Department notes that the demand costs are based on the interstate pipeline rates of Northern Natural Gas (Northern or NNG), Viking Gas Transmission (VGT), and Trailblazer Pipeline Company LLC (TPC), including any existing negotiated agreements that CPE might have with the pipelines.

Finally, in its review of demand costs, the Department found no inconsistencies between the sales forecast reported in the rate case filing and that which was presented in the base cost of gas Petition.

In Docket 23-173, the Direct Testimony of company witness Seth S. DeMerritt, at pages 68 through 74, describes the derivation of the commodity and demand costs of gas and how gas costs also affect the level of cash working capital and storage inventory costs included in the company's general rate case.<sup>4</sup> In CenterPoint's BCOG filing in Docket No. G008//MR-17-591, Commission Staff in the August 25, 2017 Staff Briefing Papers, on page 3 stated the following:<sup>5</sup>

Staff points out that commodity gas costs, although recovered dollar for dollar, is a component of total revenue and total revenue is either a component or the "driver" for various test year estimates such as bad debt expense, late payment fees and storage costs. For instance, proposed test year bad debt expense is calculated as 0.96% of firm revenue; therefore, a 10% fluctuation (\$43.645 million) in commodity gas costs would impact bad debt expense by \$419,000.

The Commission has required companies during the proceedings, to provide updated BCOG information reflecting changes in commodity and demand costs.<sup>6</sup>

Thus, the Department recommends that CenterPoint provide updated cost of gas information in this proceeding and in its companion general rate case. The Department recommends that the Commission require CenterPoint to work with both Commission and Department Staff to determine the appropriate timing for providing this information and whether the update(s) to the information should be applied to CenterPoint's BCOG and reflected in the accompanying general rate case. The update(s) should be filed in both this docket and in the general rate case Docket 23-173. Additionally, when the

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<sup>3</sup> See CenterPoint's May 31, 2023 Demand Entitlement Filing, Exhibit A, and November 1, 2023 Supplemental Filing in Docket No. G008/M-23-221.

<sup>4</sup> This testimony is available in eDockets in Docket No. G008/GR-23-173, Document ID 202311-200120-02.

<sup>5</sup> The staff briefing papers are available in eDockets in Docket No. G008/MR-17-591, Document ID 20178-135004-01.

<sup>6</sup> See for example, the Commission's *December 5, 2017 Order Setting New Base Cost of Gas for Interim Rate Period* in Docket No. G011/MR-17-564, *September 29, 2017 Order Setting New Base Cost of Gas* in Docket No. G008/MR-17-591, and *December 18, 2019 Order Setting New Base Cost of Gas* in Docket No. G008/MR-19-525, respectively.

Company files its final base cost of gas pursuant to Minn. R. 7825.2700, subp. 2, the cost of gas in that filing should equal the cost of gas approved for use in the general rate case.<sup>7</sup>

*B. COMMODITY GAS COSTS*

The Company's price forecasts were based on estimated New York Mercantile Exchange (NYMEX) Henry Hub gas prices over the period January 2024 to December 2024 as provided by CenterPoint's Gas Supply Group. CenterPoint estimated its commodity costs based on forecasted Henry Hub wellhead prices, basis point differentials for delivery of natural gas to Ventura and estimates of lost and unaccounted for gas.<sup>8</sup> This method is similar to the methods the Company used in its three prior rate cases and associated base cost of gas filings (Docket Nos. G008/GR-17-285 and G008/MR-17-591; G008/GR-19-524 and G008/MR-19-525; and G008/GR-21-435 and G008/MR-21-436).

The Department compared these estimated commodity cost rates to current NYMEX market expectations and concludes that, currently, the rate estimates appear slightly higher but are appropriate given the timing of when they were estimated by CPE.

After estimating commodity costs for its customers, CenterPoint calculated the estimated Weighted Average Cost of Gas (WACOG) for each month.<sup>9</sup> CenterPoint calculated its total gas cost recovery amount by multiplying monthly test-year sales amounts by the monthly projected WACOG price.<sup>10</sup> CenterPoint then calculated an average commodity cost of gas of \$4.6662 and CPE expects total 2024 commodity costs to be \$640,903,216.<sup>11</sup> The Department's analysis indicates that the information is generally consistent between the rate case and the base cost of gas filing with a minor rounding difference.<sup>12</sup>

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<sup>7</sup> Minn. R. 7825.2700, subp. 2, states in part: "A new base gas cost must also be part of the rate design compliance filing submitted as a result of a general rate proceeding."

<sup>8</sup> See the direct testimony of Company's witness Seth S. DeMerritt, at pages 68 through 74, that describes the derivation of the commodity and demand costs of gas. This testimony is available in eDockets in Docket No. G008/GR-23-173, Document ID 202311-200120-02.

<sup>9</sup> See Company's witness Seth S DeMerritt (Exhibit \_\_\_\_ (SSD-D), workpapers that shows the derivation of the commodity cost of gas. This workpaper is available in eDockets in Docket No. G008/GR-23-173, Document ID 202311-200113-01.

<sup>10</sup> Id.

<sup>11</sup> Petition Exhibit E, Attachment 3. See Company's witness Seth S DeMerritt (Exhibit \_\_\_\_ (SSD-D), Sch 16 and workpapers that shows the derivation of the commodity cost of gas. The testimony is available in eDockets in Docket No. G008/GR-23-173, Document ID 202311-200120-02. The workpapers are available in eDockets in Docket No. G008/GR-23-173, Document ID 202311-200113-01.

<sup>12</sup> In the Petition at Exhibit E, the total commodity costs are approximately \$640,903,216 and in the rate case for example in Direct Testimony of Seth S DeMerritt (Exhibit \_\_\_\_ (SSD-D), Schedule 16 they are \$640,902,494; however, the total commodity costs embedded in the calculations in Volume 1 – Financial Information, Schedule E-2 are approximately \$640,903,249, resulting in a difference of \$722 or \$755. Volume 1 is available in eDockets in Docket No. G008/GR-23-173, Document ID 202311-200106-01. This workpaper is available in eDockets in Docket No. G008/GR-23-173, Document ID 202311-200113-01.

*C. TOTAL GAS COSTS*

When CenterPoint's proposed demand gas costs (\$167,469,152) and commodity cost of gas (\$640,903,000) are added together, the resulting total gas costs are approximately \$808,372,152.<sup>13</sup> The Department notes that the Company's Direct Testimony of company witness Seth S. DeMerritt, at pages 68 through 74, describes the derivation of the commodity and demand costs of gas. Based on the rate case testimony and required filing, and the work papers noted earlier, the 2024 gas costs reported are \$808,372,149, resulting in a difference between the rate case and base cost of gas Petition of \$3. The Department concludes that the \$3 difference is attributable to rounding and is therefore acceptable.

*D. TARIFFS*

CenterPoint provided its proposed updated interim tariff sheets in both clean and redlined versions as Exhibit D to the Petition. The Department reviewed the proposed interim tariff sheets and concludes that the proposed changes correctly update the base cost of gas values in accordance with the calculations contained in Exhibit E of the Petition. As a result, both the clean and redlined versions of the interim tariff sheets are acceptable.

**III. CONCLUSION AND RECOMMENDATIONS**

Based on its review of the Company's Petition, the Department recommends that the Commission approve CenterPoint's BCOG filing as modified herein with the following additional recommendations.

The Department recommends that the Commission require that CenterPoint:

- provide updated cost of gas information in this proceeding and in its companion general rate case; and
- work with both Commission and Department Staff to determine the appropriate timing for providing this information and whether the update(s) to the information should be applied to CenterPoint's BCOG and reflected in the accompanying general rate case. The update(s) should be filed in both this docket and in the general rate case Docket 23-173.

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<sup>13</sup> Petition Exhibit E, Attachments 2 and 3.

## **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/MR-23-174**

Dated this **20<sup>th</sup>** day of **November 2023**

**/s/Sharon Ferguson**

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