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– VIA ELECTRONIC FILING –

April 6, 2018

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

Re: **In the Matter of a Commission Investigation into Natural Gas Utilities’
Practices, Tariffs and Assignment of Cost Responsibility for Installation of
Excess Flow Valves and Other Similar Gas Safety Equipment**

Docket No. G-999/CI-18-41

Dear Mr. Wolf:

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, hereby submits Initial Comments in the above-captioned matter. Copies of this filing have also been served on those persons listed on the attached service list.

If there are any questions, please contact me at the email address below or at 612-321-5140.

Sincerely,

/s/

Lisa Randall
Regulatory Analyst
lisa.randall@centerpointenergy.com

STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

Nancy Lange	Chair
Dan Lipschultz	Commissioner
Matt Schuerger	Commissioner
Katie Sieben	Commissioner
John Tuma	Commissioner

In the Matter of a Commission Investigation into
Natural Gas Utilities' Practices, Tariffs and Assignment
of Cost Responsibility for Installation of Excess Flow
Valves and Other Similar Gas Safety Equipment

Docket No. G-999/CI-18-41

INITIAL COMMENTS

INTRODUCTION

On February 6, 2018, the Minnesota Public Utilities Commission (the Commission) requested that all natural gas utilities make initial filings in the instant docket with comments on four topics related to excess flow valves (EFVs). CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas (CenterPoint Energy or the Company), did so on March 6, 2018. Having reviewed other utilities' initial filings, the Company herein presents its initial comments on the matter.

SOCIALIZATION OF COSTS

All utilities took the view that the costs of customer-requested EFVs should be borne by the customers requesting them, not covered by other ratepayers (i.e., "socialized").

The Company agrees, and suggests that this principle be applied to all of the costs of EFV installation. In the docket which gave rise to this one, the Commission ordered Great Plains Natural Gas to socialize the cost of the EFV itself.¹ Because the equipment cost of an EFV is a small fraction of the total cost of EFV installation on an existing service line – for Great Plains, about \$30 out of an estimated average of \$650 – socializing this cost will not materially reduce the cost burden on a requesting customer; however, if CenterPoint Energy Minnesota Gas were required to socialize the cost of the EFV, the Company would incur additional costs to design, build, test and implement a revised automated work order process in order to remove the EFV material cost from the customer's bill.

¹ Order Approving Tariff Changes and Opening Investigation, Docket No. G-004/M-17-625, January 29, 2018.

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Service List Member Information

Electronic Service Member(s)

Last Name	First Name	Email	Company Name	Delivery Method	View Trade Secret
Aberle	Tamie A.	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	Electronic Service	No
Anderson	Kristine	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.	Electronic Service	No
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Wolf	Daniel P	dan.wolf@state.mn.us	Public Utilities Commission	Electronic Service	Yes

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