



**Comments on the Application by CenterPoint Energy Resources for Authority to Increase Natural Gas Rates in Minnesota**

**PUC Docket Number: G-008/GR-21-435**

**OAH Docket Number: 65-2500-38009**

LIUNA Minnesota and North Dakota ("LIUNA") appreciates the opportunity to respond to the the Administrative Law Judge's Findings of Fact, Conclusions of Law, and Recommendation to Approve Settlement ("ALJ Report") with respect to the rate increase proposed by CenterPoint Energy ("CenterPoint") and the settlement agreement between CenterPoint and consumer and environmental advocates.

LIUNA did not participate in the rate case proceeding or settlement discussions, and we do not take a position on the proposed settlement. Our members do, however, have an interest in the outcome of the case, both as CenterPoint customers and as skilled workers who help to build and maintain the company's network of transmission and distribution pipelines. Gas delivered by CenterPoint heats thousands of LIUNA households, and hundreds of members support their families with income earned working on the CenterPoint system.

Our organization did not participate in the rate case because we generally trust that our members' interest in affordable rates and a financially healthy utility will be adequately represented by other parties. In this proceeding, however, we belatedly became aware of concerns and discussions concerning CenterPoint's infrastructure investment programs – specifically line extensions and integrity management – where the interests of our members might not have been adequately represented.

Fortunately, for the most part, the settlement agreement recognizes that the questions of whether and under what circumstances CenterPoint should extend service to new customers, and at what pace the company should replace outdated lines, are better addressed by the Commission as a policy question outside the context of a rate case. We look forward to participating in these conversations as part of a forthcoming Commission docket, and we hope in the future that discussions regarding our members' work on the system will take place in dockets where there is adequate notice for LIUNA and other stakeholders with an interest in access to gas service, system integrity, and associated jobs and economic activity.

We trust that we and other interested stakeholders will have the opportunity to fully participate in these discussions, and that the Commission's consideration of future system investment will not be constrained or limited to the terms or questions posed in the settlement agreement.

Thank you for the opportunity to comment.

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Respectfully Submitted By:

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