



October 20, 2014

VIA E-Filing Public Document Trade Secret Information Has Been Excised

Dr. Burl Haar, Executive Secretary Minnesota Public Utilities Commission 121 East Seventh Place, Suite 350 St. Paul, MN 55101-2147

Re: Reply Comments of CenterPoint Energy to the Minnesota Department of

Commerce's comments to CenterPoint Energy's Compliance Filing in

Docket No. G-008/GR-13-316

Dear Dr. Haar:

CenterPoint Energy has received and reviewed the October 8, 2014 comments from the Minnesota Department of Commerce's (Department or DOC) concerning CenterPoint Energy's Compliance filing in its 2013 General Rate Case, Docket No. G-008/GR-13-316, filed on September 8, 2014. In the cover letter to its comments, the Department recommended approval of the Company's Compliance filing and CenterPoint Energy agrees with that recommendation.

However, in its comments, the DOC also stated that the revenue apportionment used in the Compliance filing "may be inconsistent with the Commission's Order" and requested the presentation of an additional revenue apportionment. To clarify this discussion, we are providing additional information on the revenue apportionment used both in the financial schedules that were submitted based on the Administrative Law Judge (ALJ) report and in the Compliance filing and an additional revenue apportionment scenario to respond to the DOC's request.

Table 1 below shows the revenue apportionment initially proposed by the Company (which the ALJ found reasonable and which was accepted by the Commission). As described in the testimony of Mr. Burl Drews, the only proposed increase in non-gas revenues for the SVDF and LV classes were for increases in the Conservation Cost Recovery Charge ("CCRC") that are included in base rates and collected through the volumetric delivery charge to recover Conservation Improvement Program ("CIP") costs approved by the Commission. The increase for the Commercial/Industrial C class is also due to the increase in the CCRC, as well as an increase in Gas Affordability Service Program ("GAP") costs. Otherwise, the base rates for these classes are not being changed. (Drews direct testimony starting on page 4 line 17).

Table 1: Pro	posed in Ori	iginal Filing							
Amounts sho	own in \$000s								
	Non Coo	CCRC Test Year	non-CIP Test Year				Degraated	Dagwaatad	
	Non-Gas Revenue	Revenue @	Revenue @	Requested	Requested		Requested non-CIP	Requested Total Non	column I
	@ Present	Present	Present	CCRC	non-CIP	Requested	Non Gas	Gas	PCT of
Class	Rates	Rates	Rates	Increase	Increase	CCRC	Revenue	Revenue	Total
(a)	(b)=(c)+(d)	(c)	(d)	(e)	(f)	(g)=(c)+(e)	(h)=(d)+(f)	(i)=(g)+(h)	(j)
Residential	186,132	4,277	181,855	8,003	27,545	12,280	209,400	221,680	67.4%
Comm A	8,064	148	7,916	277	1,068	425	8,984	9,409	2.9%
C/I Firm B	10,963	309	10,655	578	(380)	887	10,275	11,162	3.4%
C/I Firm C	40,022	1,465	38,557	2,741	105	4,206	38,662	42,868	13.0%
Sm D F A	11,423	624	10,799	1,167	16	1,791	10,815	12,606	3.8%
Sm D F B	6,939	433	6,506	811	(27)	1,244	6,479	7,723	2.3%
Lg Vol	21,274	1,335	19,939	2,498	(79)	3,833	19,860	23,693	7.2%
TOTAL	284,817	8,591	276,227	16,075	28,248	24,666	304,475	329,141	100.0%

The ALJ discussed revenue apportionment on pages 128-136 of her report and found CenterPoint Energy's proposed revenue apportionment to be reasonable. Pursuant to the PUC notice on April 10, 2014, the Company filed financial and rate design schedules based on the ALJ report on April 16, 2014. The revenue apportionment for these schedules is shown below in table 2. Due to rounding, the resulting revenue apportionment shown in column P below is consistent with, but not exactly equal to the proposed apportionment. However, the only increase in non-gas revenues for the SVDF and LV classes are for increases in the CCRC and the increase for the Commercial/Industrial C class is also due to the increase in the CCRC, as well as GAP costs. Otherwise, the base revenues for these classes were not changed.

Table 2: Based on ALJ Report												
Amounts sh	nown in \$000	s										
	Non-Gas	CCRC Test Year Revenue	non-CIP Test Year Revenue				ALJ non-					
Class	Revenue @ Present Rates	@ Present Rates	@ Present Rates	ALJ CCRC Increase	ALJ non- CIP Increase	ALJ CCRC	CIP Non Gas Revenue	ALJ Total Non Gas Revenue	column N PCT of Total			
(a)	(b)=(c)+(d)	(c)	(d)	(k)	(I)	(m)=(c)+(k)	(n)=(d)+(l)	(o)=(m)+(n)	(p)			
Residential	186,132	4,277	181,855	8,003	12,104	12,280	193,959	206,239	66.5%			
Comm A	8,064	148	7,916	277	513	425	8,429	8,854	2.9%			
C/I Firm B	10,963	309	10,655	578	609	887	11,264	12,151	3.9%			
C/I Firm C	40,022	1,465	38,557	2,741	2,338	4,206	40,895	45,101	14.0%			
Sm D F A	11,423	624	10,799	1,167	-	1,791	10,799	12,590	3.7%			
Sm D F B	6,939	433	6,506	811	-	1,244	6,506	7,750	2.2%			
Lg Vol	21,274	1,335	19,939	2,498	-	3,833	19,939	23,772	6.8%			
TOTAL	284,817	8,591	276,227	16,075	15,564	24,666	291,791	316,457	100.0%			

The PUC notice that required the financial and rate design schedules gave parties until April 21, 2014 to file comments and raise any issues or concerns with the schedules. No comments were received on the schedules (exceptions to the ALJ report were filed separately).

The Commission discussed revenue apportionment in section XIX of its Order (starting on page 41) and concurred "with the Administrative Law Judge and accepts her findings, conclusions, and recommendation on this issue." Table 3 below shows the revenue apportionment used in the Compliance filing. Similar to the revenue apportionment used in the ALJ schedules, the resulting revenue apportionment shown in column V below is consistent with, but not exactly equal to the proposed apportionment, again, due to rounding. However, the only increase in non-gas revenues for the SVDF and LV classes were for increases in the CCRC and the increase for the Commercial/Industrial C class is also due to the increase in the CCRC, as well as for the GAP costs. Otherwise, the base revenues for these classes were not changed.

Table 3: Co	Table 3: Compliance Filing												
Amounts sh	nown in \$000	s											
Class	Non-Gas Revenue @ Present Rates	CCRC Test Year Revenue @ Present Rates	non-CIP Test Year Revenue @ Present Rates	Compl. CCRC Increase	Compl. non-CIP Increase	Comp. CCRC	Comp. non-CIP Non Gas Revenue	Comp. Total Non Gas Revenue	column T PCT of Total				
(a)	(b)=(c)+(d)	(c)	(d)	(q)	(r)	(s)=(c)+(q)	(t)=(d)+(r)	(u)=(s)+(t)	(v)				
Residential	186,132	4,277	181,855	8,003	13,114	12,280	194,969	207,249	66.5%				
Comm A	8,064	148	7,916	277	556	425	8,472	8,897	2.9%				
C/I Firm B	10,963	309	10,655	578	660	887	11,315	12,202	3.9%				
C/I Firm C	40,022	1,465	38,557	2,741	2,534	4,206	41,091	45,297	14.0%				
Sm D F A	11,423	624	10,799	1,167	-	1,791	10,799	12,590	3.7%				
Sm D F B	6,939	433	6,506	811	(1)	1,244	6,505	7,749	2.2%				
Lg Vol	21,274	1,335	19,939	2,498	-	3,833	19,939	23,772	6.8%				
TOTAL	284,817	8,591	276,227	16,075	16,863	24,666	293,090	317,756	100.0%				

CenterPoint Energy continues to support the revenue apportionment used in both the ALJ schedules and the Compliance filing. However, we are providing an additional revenue apportionment calculation in table 4 below to respond to the DOC request which shows the result when revenue is re-apportioned among firm classes¹. This methodology increases the revenue required from the Residential class and decreases the revenue required from the Commercial/Industrial B and C classes. The supporting calculations and details are included as ATTACHMENT A, which is Trade Secret Information. In general, the new proposed revenue apportionment is closer to cost – in

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¹ The Company notes that if the revenue from firm classes in total is changed, there would be an impact to bad debt expense and late payment revenue. However, it is not expected to be significant.

fact residential rates are increased by an additional \$4.7 million beyond the amount shown in the Company's Compliance filing. While, CenterPoint Energy supports moving natural gas rates closer to cost, there are concerns with this specific proposal beyond the additional unintended increase to the Residential and small business classes since the detailed calculations have just been developed in response to DOC comments after the close of the rate case record. Additionally, there could be a significant number of additional alternative apportionments that could be developed.

Table 4: Nev	w Alternative								
Amounts sh	own in \$000	s							
		CCRC Test Year	non-CIP Test Year						
Class	Non-Gas Revenue @ Present Rates	Revenue @ Present Rates	Revenue @ Present Rates	New CCRC Increase	New non- CIP Increase	New CCRC	New non- CIP Non Gas Revenue	New Total Non Gas Revenue	column Z PCT of Total
(a)	(b)=(c)+(d)	(c)	(d)	(w)	(x)	(y)=(c)+(w)	(z)=(d)+(x)	(aa)=(y)+(z)	(ab)
Residential	186,132	4,277	181,855	8,003	17,856	12,280	199,711	211,991	68.1%
Comm A	8,064	148	7,916	277	746	425	8,662	9,087	3.0%
C/I Firm B	10,963	309	10,655	578	(442)	887	10,213	11,100	3.5%
C/I Firm C	40,022	1,465	38,557	2,741	(1,294)	4,206	37,263	41,469	12.7%
SmDFA	11,423	624	10,799	1,167	-	1,791	10,799	12,590	3.7%
SmDFB	6,939	433	6,506	811	(1)	1,244	6,505	7,749	2.2%
Lg Vol	21,274	1,335	19,939	2,498	-	3,833	19,939	23,772	6.8%
TOTAL	284,817	8,591	276,227	16,075	16,865	24,666	293,092	317,758	100.0%

As stated above, CenterPoint Energy continues to support the revenue apportionment used in the ALJ schedules and the Compliance filing. CenterPoint Energy has reviewed the DOC October 8 recommendations. As discussed above, CenterPoint Energy agrees with the overall recommendation to approve the Compliance filing, but has concerns with the recommendation related to revenue apportionment for the reasons stated above. Given the time needed to print bill inserts and other communication materials related to the new rates and rate design, CenterPoint Energy respectfully requests that the PUC consider this Compliance filing in a timely manner.

If you have any questions, please contact me at 612-321-4625.

Sincerely,

/s/

Peggy Sorum Manager, Regulatory Financial Activities

PUBLIC DOCUMENT

TRADE SECRET INFORMATION HAS BEEN EXCISED

Attachment A of this filing has been marked "TRADE SECRET" and should not be disclosed to any party, other than parties having signed written Confidentiality Agreements in this proceeding, without the written consent of CenterPoint Energy. 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, and (3) the protected information contains operating 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.

Docket No. G-008/GR-13-316 Reply Comments to Compliance Filing Attachment A Page 1 of 10

PUBLIC INFORMATION Trade Secret Data has been Excised

Rate	e Class								
(a)	(b)	(c)	(d)	(e)_	(f)	(g)	(h) _	(i)	(j)
				Present Rates			Proposed		Revenue Change
Resi	idential		Test-Year Units		t-Year Revenues		Proposed Rates Pr		
1		Customer Bills	9,048,010	\$8.0000	\$72,384,080	Customer Bills	\$9.5000	\$85,956,095	\$13,572,015
2		Total Sales	66,414,500	\$6.4867	\$430,810,937	Total Sales	\$6.6717	\$443,097,620	\$12,286,683
3		Total Revenue			\$503,195,017	Total Revenue		\$529,053,715	\$25,858,698
4									
5		Demand	66,414,500	\$0.7692	\$51,086,033	Demand	\$0.7692	\$51,086,033	\$0
6		Commodity	66,414,500	\$4.0048	\$265,976,790	Commodity	\$4.0048	\$265,976,790	\$0
7		Cost of Gas	66,414,500	\$4.7740	\$317,062,823	Cost of Gas	\$4.7740	\$317,062,823	\$0
8		Delivery Chrg B4 CIP	66,414,500	\$1.5993	\$106,216,710	Delivery Chrg B4 CIP	\$1.6609	\$110,307,843	\$4,091,133
9		CCRC	66,414,500	\$0.0644	\$4,277,094	CCRC	\$0.1849	\$12,280,041	\$8,002,947
10		Delivery Charge Total	66,414,500	\$1.6637	\$110,493,804	Delivery Charge Total	\$1.8458	\$122,587,884	\$12,094,080
11		GAP	66,414,500	\$0.0490	\$3,254,311	GAP	\$0.0519	\$3,446,913	\$192,602
12		Total Billing Rate	66,414,500	\$6.4867	\$430,810,937	Total Billing Rate	\$6.6717	\$443,097,620	\$12,286,683
13									
14									
15				Present Rates			Proposed		Revenue Change
16 Com	n A		Test-Year Units	Present Rates Test	t-Year Revenues		Proposed Rates Pr	oposed Revenue	
17		Customer Bills	381,219	\$12.0000	\$4,574,628	Customer Bills	\$15.0000	\$5,718,285	\$1,143,657
18		Total Sales	2,300,300	\$6.3043	\$14,501,781	Total Sales	\$6.2521	\$14,381,706	-\$120,076
19		Total Revenue			\$19,076,409	Total Revenue		\$20,099,991	\$1,023,581
20									
21		Demand	2,300,300	\$0.7692	\$1,769,391	Demand	\$0.7692	\$1,769,391	\$0
22		Commodity	2,300,300	\$4.0181	\$9,242,835	Commodity	\$4.0181	\$9,242,835	\$0
23		Cost of Gas	2,300,300	\$4.7873	\$11,012,226	Cost of Gas	\$4.7873	\$11,012,226	\$0
24		Delivery Chrg B4 CIP	2,300,300	\$1.4036	\$3,228,701	Delivery Chrg B4 CIP	\$1.2280	\$2,824,768	-\$403,933
25		CCRC	2,300,300	\$0.0644	\$148,139	CCRC	\$0.1849	\$425,325	\$277,186
26		Delivery Charge Total	2,300,300	\$1.4680	\$3,376,840	Delivery Charge Total	\$1.4129	\$3,250,094	-\$126,747
27		GAP	2,300,300	\$0.0490	\$112,715	GAP	\$0.0519	\$119,386	\$6,671
28		Total Billing Rate	2,300,300	\$6.3043	\$14,501,781	Total Billing Rate	\$6.2521	\$14,381,706	-\$120,076

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PUBLIC INFORMATION

	Rate Class									Jaia 1140 20011 Excised
(a)	(k	b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)
					Present Rates			Proposed	Rates	Revenue Change
	Comm/Ind B			Test-Year Units	Present Rates T	est-Year Revenues		Proposed Rates Pr		. .
1			Customer Bills	211,948	\$18.0000	\$3,815,064	Customer Bills	\$21.0000	\$4,450,908	\$635,844
2			Total Sales	4,793,700	\$6.2785	\$30,097,245	Total Sales	\$6.1741	\$29,596,783	-\$500,462
3			Total Revenue		=	\$33,912,309	Total Revenue	_	\$34,047,691	\$135,382
4						*****			¥ - / - /	,,
5			Demand	4,793,700	\$0.7692	\$3,687,314	Demand	\$0.7692	\$3,687,314	\$0
6			Commodity	4,793,700	\$4.0181	\$19,261,566	Commodity	\$4.0181	\$19,261,566	\$0
7			Cost of Gas	4,793,700	\$4.7873	\$22,948,880	Cost of Gas	\$4.7873	\$22,948,880	\$0
8			Delivery Chrg B4 CIP	4,793,700	\$1.3778	\$6,604,760	Delivery Chrg B4 CIP	\$1.1500	\$5,512,755	-\$1,092,005
9			CCRC	4,793,700	\$0.0644	\$308,714	CCRC	\$0.1849	\$886,355	\$577,641
10			Delivery Charge Total	4,793,700	\$1.4422	\$6,913,474	Delivery Charge Total	\$1.3349	\$6,399,110	-\$514,364
11			GAP	4,793,700	\$0.0490	\$234,891	GAP	\$0.0519	\$248,793	\$13,902
12			Total Billing Rate	4,793,700	\$6.2785	\$30,097,245	Total Billing Rate	\$6.1741	\$29,596,783	-\$500,462
13										
14										
15					Present Rates			Proposed		Revenue Change
16	Comm/Ind C			Test-Year Units		est-Year Revenues		Proposed Rates Pr	•	
17			Customer Bills	198,019	\$43.0000	\$8,514,817	Customer Bills	\$43.0000	\$8,514,817	\$0
18			Total Sales	22,745,700	\$6.1350 <u> </u>	\$139,544,870	Total Sales	\$6.1986	\$140,991,496	\$1,446,627
19			Total Revenue			\$148,059,687	Total Revenue		\$149,506,313	\$1,446,627
20						*				
21			Demand	22,745,700	\$0.7692	\$17,495,992	Demand	\$0.7692	\$17,495,992	\$0
22			Commodity	22,745,700	\$3.9806	\$90,541,533	Commodity	\$3.9806	\$90,541,533	\$0
23			Cost of Gas	22,745,700	\$4.7498 \$1.2718	\$108,037,526 \$28,927,981	Cost of Gas	\$4.7498	\$108,037,526	\$0 -\$1,360,193
24 25			Delivery Chrg B4 CIP CCRC	22,745,700			Delivery Chrg B4 CIP CCRC	\$1.2120 \$0.1849	\$27,567,788	
				22,745,700	\$0.0644	\$1,464,823			\$4,205,680	\$2,740,857
26			Delivery Charge Total	22,745,700	\$1.3362	\$30,392,804	Delivery Charge Total	\$1.3969	\$31,773,468	\$1,380,664
27			GAP	22,745,700	\$0.0490	\$1,114,539	GAP	\$0.0519	\$1,180,502	\$65,963
28			Total Billing Rate	22,745,700	\$6.1350	\$139,544,870	Total Billing Rate	\$6.1986	\$140,991,496	\$1,446,627
29					December Detec			Danasas	I Data	D
30	T-1-1 O	171	Firm	T()/ 11-11-	Present Rates	N D		Proposed		Revenue Change
31	Total Commercial	i / industriai	- Firm	Test-Year Units	Present Rates T	est-Year Revenues		Proposed Rates Pr	oposea Revenue	
32 33			Customer Bills	791,186		\$16,904,509	Customer Bills		\$18,684,010	\$1,779,501
33 34			Total Sales	791,186 29,839,700		\$16,904,509 \$184,143,896	Total Sales		\$18,684,010 \$184,969,985	\$1,779,501 \$826,089
			Total Revenue	25,035,700	=		Total Sales Total Revenue	_		
35			rotal Revenue			\$201,048,405	rotal Revenue		\$203,653,995	\$2,605,590

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PUBLIC INFORMATION

	Rate Class							
(a)	(b)	(c)	(d)	(e) Present Rates	(f)	(g)	(h) (i) Proposed Rates	(j) Revenue Change
	SVDF ASales Service		Test-Year Units [Trade Secret Data Be		Test-Year Revenues		Proposed Rates Proposed Revenue [Trade Secret Data Begins	
1		Customer Bills	[Hade Occiet Data De	gillo		Customer Bills	[Trade Secret Data Degins	
2		Total Sales				Total Sales		
3		Total Revenue				Total Revenue		3
4								
5		Demand				Demand		
6		Commodity				Commodity		
7		Cost of Gas				Cost of Gas		
8		Delivery Chrg B4 CIP				Delivery Chrg B4 CIP		-
9		CCRC				CCRC		
10		Delivery Charge Total				Delivery Charge Total	-	
11		GAP				GAP		•
12		Total Billing Rate				Total Billing Rate		
13					Trade Secret Data Ends]			Trade Secret Data Ends]
14								
15				Present Rates			Proposed Rates	Revenue Change
16	SVDF AMarket Rate		Test-Year Units		Test-Year Revenues		Proposed Rates Proposed Revenue	
17		Customer Bills	[Trade Secret Data Be	gins		Customer Bills	[Trade Secret Data Begins	
18 19		Total Sales				Total Sales		
20		Total Revenue				Total Revenue	-	
21		Total Nevertue				Total Neverlue		
22		Demand				Demand		
23		Commodity				Commodity		
24		Cost of Gas				Cost of Gas	-	•
25		Delivery Chrg B4 CIP				Delivery Chrg B4 CIP		
26		CCRC				CCRC		
27		Delivery Charge Total				Delivery Charge Total		
28		GAP				GAP		
29		Total Billing Rate		<u> </u>		Total Billing Rate		
30					Trade Secret Data Ends]			Trade Secret Data Ends]
31								
32				Present Rates			Proposed Rates	Revenue Change
33	SVDF ATotal Service		Test-Year Units		Test-Year Revenues		Proposed Rates Proposed Revenue	
34		Customer Dille	[Trade Secret Data Be	gins			[Trade Secret Data Begins	· ·
35 36	(sum of SVDF-A-Sales Service +	Customer Bills Total Sales						
	•	Total Revenue						
37 38	SVDF-A Market Rate)	rotal Revenue	<u> </u>		Trade Secret Data Ends 1			Trade Secret Data Ends]
50				•••	Trade Secret Data Effos J		•••	i iaut ottiti Dala Enus J

CENTERPOINT ENERGY
CALCULATION OF PRESENT AND FINAL AUTHORIZED BILLING RATE REVENUE BY CLASS
Authorized \$32,943,000
ALTERNATIVE REVENUE APPORTIONMENT

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PUBLIC INFORMATION

	Rate Class							
(a)	(b)	(c)	(d)	(e) Present Rates	(f)	(g)	(h) (i) Proposed Rates	(j) Revenue Change
	SVDF ATransport		Test-Year Units	Present Rates	Test-Year Revenues		Proposed Rates Proposed Revenue	•
1	·		[Trade Secret Data Be	gins			[Trade Secret Data Begins	
2		Customer Bills						
3		Total Sales						
4		Total Revenue						
5								
6		Demand						
7		Commodity						
8		Cost of Gas						
9		Delivery Chrg B4 CIP			_			
10		CCRC						
11		Delivery Charge Total					<u> </u>	
12		GAP						
13		Total Billing Rate			_		·	
14					. Trade Secret Data Ends]		Tr	ade Secret Data Ends]
15								
16								
17				Present Rates			Proposed Rates	Revenue Change
18	SVDF ASystem + Transport		Test-Year Units	Present Rates	Test-Year Revenues		Proposed Rates Proposed Revenue	
19		Customer Bills	25,500		\$1,625,800	Customer Bills	\$1,370,800	-\$255,000
20		Total Sales	9,688,000		\$46,801,928	Total Sales	\$48,224,126	\$1,422,198
21		Total Revenue			\$48,427,728	Total Revenue	\$49,594,926	\$1,167,198

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PUBLIC INFORMATION

	Rate Class						Trade Coolet E	Jala Hao Doon Exoloce
(a)	(b)	(c)	(d)	(e) Present Rates	(f)	(g)	(h) (i) Proposed Rates	(j) Revenue Change
	SVDF BSales Service		Test-Year Units	Present Rates	Test-Year Revenues		Proposed Rates Proposed Revenue	_
			[Trade Secret Data Beg	jins			[Trade Secret Data Begins	
1		Customer Bills				Customer Bills		
2		Total Sales				Total Sales		
3		Curtailment				Curtailment		
4		Total Revenue				Total Revenue		
5								
6		Demand				Demand		
7		Commodity				Commodity		
8		Cost of Gas				Cost of Gas		
9		Delivery Chrg B4 CIP				Delivery Chrg B4 CIP		
10		CCRC				CCRC		
11		Delivery Charge Total				Delivery Charge Total		
12		GAP				GAP		
13		Total Billing Rate				Total Billing Rate		
14					Trade Secret Data Ends]		Tr	rade Secret Data Ends
15								
16				Present Rates			Proposed Rates	Revenue Change
17	SVDF BMarket Rate		Test-Year Units		Test-Year Revenues		Proposed Rates Proposed Revenue	
18			[Trade Secret Data Beg	jins		5 · 5 · 5 · ·	[Trade Secret Data Begins	
19		Customer Bills				Customer Bills		
20		Total Sales				Total Sales		
21		Total Revenue				Total Revenue		
22		Demond				Demond.		
23 24		Demand Commodity				Demand Commodity		
		•				•		
25		Cost of Gas				Cost of Gas		
26		Delivery Chrg B4 CIP				Delivery Chrg B4 CIP		
27		CCRC				CCRC		
28		Delivery Charge Total				Delivery Charge Total		
29		GAP				GAP		
30		Total Billing Rate				Total Billing Rate		
31					Trade Secret Data Ends]		Tı	rade Secret Data Ends
32								
33	T		-	Present Rates	T D		Proposed Rates	Revenue Change
34 35	Total SVDF BService		Test-Year Units		Test-Year Revenues		Proposed Rates Proposed Revenue	
35 36		Customer Bills	[Trade Secret Data Beg	jins		Customer Bills	[Trade Secret Data Begins	
36 37		Total Sales				Total Sales		
38	(sum of SVDF-B-Sales Service +	Total Revenue				Total Revenue		
39	SVDF-B Market Rate)	Total Revenue			Trade Secret Data Ends]	Total Revenue	T	rade Secret Data Ends

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	Rate Class							
(a)	(b)	(c)	(d)	(e) Present Rates	(f)	(g)	(h) (i) Proposed Rates	(j) Revenue Change
	Total SVDF BTransport		Test-Year Units	Present Rates	Test-Year Revenues	Customer Bills	Proposed Rates Proposed Revenue	-
1	•		[Trade Secret Data Be	gins			[Trade Secret Data Begins	
2		Customer Bills				Total Sales		
3		Total Sales				Total Revenue		
4		Total Revenue						
5								
6		Demand				Demand		
7		Commodity				Commodity		
8		Cost of Gas				Cost of Gas		
9		Delivery Chrg B4 CIP				Delivery Chrg B4 CIP		
10		CCRC				CCRC		
11		Delivery Charge Total				Delivery Charge Total		
12		GAP				GAP		
13		Total Billing Rate				Total Billing Rate		
14		· ·			Trade Secret Data Ends]	ū	Tr	ade Secret Data Ends]
15								
16				Present Rates			Proposed Rates	Revenue Change
17	SVDF BSystem + Transport		Test-Year Units	Present Rates	Test-Year Revenues		Proposed Rates Proposed Revenue	
18		Customer Bills	4,896		\$494,940	Customer Bills	\$445,980	-\$48,960
19		Total Sales	6,728,400		\$29,605,342	Total Sales	\$30,464,559	\$859,217
20		Total Revenue			\$30,100,282	Total Revenue	\$30,910,539	\$810,257
21								

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PUBLIC INFORMATION

	Rate Class							
(a)	(b)	(c)	(d)	(e) Present Rates	(f)	(g)	(h) (i) Proposed Rates	(j)
	Large Volume DFService		Test-Year Units		Test-Year Revenues		Proposed Rates Proposed Revenue	Revenue Change
1	•		[Trade Secret Data Be	gins			·	Ŭ
2		Customer Bills				Customer Bills		
3		Total Sales				Total Sales		
4		Curtailment				Curtailment		
5		Total Revenue				Total Revenue		
6								
7		Demand				Demand		
8		Commodity				Commodity		
9		Cost of Gas				Cost of Gas		
10		Delivery Chrg B4 CIP				Delivery Chrg B4 CIP		
11		CCRC				CCRC		
12		Delivery Charge Total				Delivery Charge Total		
13		GAP				GAP		
14		Total Billing Rate				Total Billing Rate		
15					Trade Secret Data Ends]			rade Secret Data Ends]
16				\$0.0659			\$0.0659	
17	Large Volume DFMR-Service		Test-Year Units		Test-Year Revenues		Proposed Rates Proposed Revenue	Revenue Change
18			[Trade Secret Data Beg	gins				
19		Customer Bills				Customer Bills		
20		Minimum Volume				Minimum Volume		
21		CIP Exempt Volumes				CIP Exempt Volumes		
22		Total Sales				Total Sales		
23		Curtailment				Curtailment		
24		Total Revenue				Total Revenue		i
25								
26		Demand				Demand		
27		Commodity		-		Commodity		
28		Cost of Gas				Cost of Gas		
29 30		Delivery Chrg B4 CIP CCRC				Delivery Chrg B4 CIP CCRC		
31		Delivery Charge Total				Delivery Charge Total		
32		GAP		-		GAP		
33		Total Billing Rate				Total Billing Rate		
34		Total Billing Rate			Trade Secret Data Ends]	Total Billing Kate		rade Secret Data Ends]
35					Trade ocoret Bata Endo 1			Occirci Data Endo j
36	Total Large Volume DF		Test-Year Units	Present Rates	Test-Year Revenues		Proposed Rates Proposed Revenue	Revenue Change
37	3		[Trade Secret Data Be				[Trade Secret Data Begins	J.
38	Sales Service + Market Rate	Customer Bills				Customer Bills		
39		Minimum Volume				Minimum Volume		
40		CIP Exempt Volumes				CIP Exempt Volumes		
41		Total Sales				Total Sales		
42		Total Revenue				Total Revenue		
43			-		Trade Secret Data Ends]		Т	rade Secret Data Ends]

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PUBLIC INFORMATION

	Rate Class							
(a)	(b)	(c)	(d)	(e) Present Rates	(f)	(g)	(h) (i) Proposed Rates	(j) Revenue Change
	Large Volume DFTransport		Test-Year Units		Test-Year Revenues		Proposed Rates Proposed Revenue	· ·
			[Trade Secret Data B	egins			[Trade Secret Data Begins	
1		Customer Bills				Customer Bills		
2		Minimum Volume				Minimum Volume		
3		Total Sales				Total Sales		
4		Curtailment				Curtailment		
5		Total Revenue				Total Revenue		
6								
7		Demand				Demand		
8		Commodity				Commodity		
9		Cost of Gas				Cost of Gas		
10		Delivery Chrg B4 CIP				Delivery Chrg B4 CIP		
11		CCRC				CCRC		
12		Delivery Charge Total		-		Delivery Charge Total		
13		GAP				GAP		
14		Total Billing Rate				Total Billing Rate		
15		3			Trade Secret Data Ends 1	3		Frade Secret Data Ends 1
16								
17	Large Volume DF- MR- Transport		Test-Year Units	Present Rates	Test-Year Revenues		Proposed Rates Proposed Revenue	
18			[Trade Secret Data B	egins			[Trade Secret Data Begins	Revenue Change
19		Customer Bills				Customer Bills		
20		Minimum Volume				Minimum Volume		
21		CIP Exempt Volumes				CIP Exempt Volumes		
22		Total Sales				Total Sales		
23		Curtailment				Curtailment	-	
24		Total Revenue				Total Revenue		
25								
26		Demand				Demand		
27		Commodity				Commodity		
28		Cost of Gas				Cost of Gas		
29		Delivery Chrg B4 CIP				Delivery Chrg B4 CIP		
30		CCRC				CCRC		
31		Delivery Charge Total				Delivery Charge Total		
32		GAP		-		GAP		
33		Total Billing Rate				Total Billing Rate		
34		· ·	' -		Trade Secret Data Ends]	· ·		Frade Secret Data Ends]
35								
36	Total Large Volume DF Transport		Test-Year Units	Present Rates	Test-Year Revenues		Proposed Rates Proposed Revenue	Revenue Change
37			[Trade Secret Data B	egins			[Trade Secret Data Begins	
38		Customer Bills				Customer Bills		
39		Minimum Volume				Minimum Volume		
40	(DF Transport + MR Transport)	CIP Exempt Volumes				CIP Exempt Volumes		
41		Total Sales				Total Sales		
42		Total Revenue				Total Revenue		
43					Trade Secret Data Ends]		·	Frade Secret Data Ends]

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PUBLIC INFORMATION

	Rate Class							
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h) (i)	(j)
				Present Rates			Proposed Rates	Revenue Change
	Large Volume Firm Transport		Test-Year Units	Present Rates	Test-Year Revenues		Proposed Rates Proposed Revenue	
			[Trade Secret Data Be	egins			[Trade Secret Data Begins	
1		Customer Bills				Customer Bills		
2		Demand Delivery				Demand Delivery		
3		CIP Exempt Volumes				CIP Exempt Volumes		
4		Total Sales				Total Sales		
5		Total Revenue				Total Revenue		
6								
7		Demand				Demand		
8		Commodity				Commodity		
a		Cost of Gas		-		Cost of Gas		
40				-				
10		Delivery Chrg B4 CIP				Delivery Chrg B4 CIP		
11		CCRC				CCRC		
12		Delivery Charge Total				Delivery Charge Total		
13		GAP				GAP		
14		Total Billing Rate				Total Billing Rate		
15					Trade Secret Data Ends]		Tr	ade Secret Data Ends]
16								
17				Present Rates			Proposed Rates	Revenue Change
18	Total Large Volume Transport & S	Service	Test-Year Units	Present Rates	Test-Year Revenues		Proposed Rates Proposed Revenue	
19		Customer Bills	2,964		\$1,908,000	Customer Bills	\$2,500,800	\$592,800
20		Demand Del/Min. Vol.			\$8,781,733	Demand Del/Min. Vol.	\$8,781,733	\$0
21		CIP Exempt Vols	25,802,756			CIP Exempt Volumes		
22		Total Sales (aft Curtailment)	46,533,261		\$51,932,893	Total Sales	\$53,837,701	\$1,904,808
23		Total Revenue			\$62,622,626	Total Revenue	\$65,120,234	\$2,497,608
							+ 1 : = = 1 = = :	. , . ,

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PUBLIC INFORMATION

	Rate Class								
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)
1 2 3 4 5 6 7 8 9 10 11	Total System Results	Customer Bills Demand Del/Min. Vol. CIP Exempt Volumes Total Sales (aft Curtail) Total Revenue Demand Commodity Cost of Gas Delivery Chrg B4 CIP CCRC Delivery Charge Total	Test-Year Units 9,872,556 25,802,756 159,203,861 159,203,861 159,203,861 159,203,861 133,401,105 159,203,861	Present Rates Present Rates	\$3,317,329 \$8,781,733 \$743,294,996 \$845,394,058 \$74,038,731 \$486,537,617 \$560,576,347 \$169,411,162 \$8,591,031 \$178,002,193	Customer Bills Demand Del/Min. Vol. CIP Exempt Volumes Total Sales Total Revenue Demand Commodity Cost of Gas Delivery Chrg B4 CIP CCRC Delivery Charge Total	Propos	ed Rates Proposed Revenue \$108,957,685 \$8,781,733 \$760,593,990 \$878,333,409 \$74,038,731 \$486,537,617 \$560,576,347 \$170,356,186 \$24,665,864 \$195,022,050	Revenue Change \$15,640,356 \$0 \$17,298,994 \$32,939,350 \$0 \$0 \$0 \$0 \$16,074,833 \$17,019,857
13 14		GAP	96,254,200 150,202,961		\$4,716,456	GAP	-	\$4,995,593	\$279,137
15		Total Revenue	159,203,861		\$743,294,996	Total Billing Rate	=	\$760,593,990	\$17,298,994
16 17 18 19 20			Natural Gas System Red Transport Revenue Total Revenue	venue	\$826,548,008 \$18,846,050 \$845,394,058		-	\$857,666,218 \$20,667,190 \$878,333,409	\$31,118,210 \$1,821,140 \$32,939,350
21 22			Net Margin Revenue 1/		\$284,817,711			\$317,757,061	\$32,939,350
23 24			Volumetric Margin Reve	nue 2/	\$191,500,382			\$208,799,376	\$17,298,994
25 26			RC, GAP and Demand/Min \ AP and Demand/Min Vol. Do		Basic Charge Revenue				

^{2/} incl Delivery, CCRC, GAP and Demand/Min Vol. Does NOT include Basic Charge Revenue

AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)	
) ss. COUNTY OF HENNEPIN)	
Mary Jo Schuh, being first duly sworn on	oath, deposes and says she served the
attached Reply Comments in Docket No.	G-008/GR-13-316 via e-filing to the Minnesota
PUC and DOC, as well as all other parties	s on the attached Service List.
Ī	<u>/s/</u> Mary Jo Schuh
Subscribed and sworn to before me	
this <u>20th</u> day of <u>October, 2014</u> .	
Linda Baumann, Notary Public	
My Commission expires 1/31/15	

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street Minneapolis, MN 554024629	Electronic Service	Yes	OFF_SL_13-316_Official CC Service List
Julia	Anderson	Julia.Anderson@ag.state.m n.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_13-316_Official CC Service List
Brenda A.	Bjorklund	brenda.bjorklund@centerp ointenergy.com	CenterPoint Energy	800 LaSalle Ave FL 14 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-316_Official CC Service List
James	Canaday	james.canaday@ag.state. mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_13-316_Official CC Service List
Jerry	Dasinger	jerry.dasinger@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_13-316_Official CC Service List
Jeffrey A.	Daugherty	jeffrey.daugherty@centerp ointenergy.com	CenterPoint Energy	800 LaSalle Ave Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-316_Official CC Service List
lan	Dobson	ian.dobson@ag.state.mn.u s	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, BRM Tower St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_13-316_Official CC Service List
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_13-316_Official CC Service List
Robert	Harding	robert.harding@state.mn.u s	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_13-316_Official CC Service List
Mary	Holly	mholly@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-316_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Linda	Jensen	linda.s.jensen@ag.state.m n.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_13-316_Official CC Service List
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_13-316_Official CC Service List
Peter	Madsen	peter.madsen@ag.state.m n.us	Office of the Attorney General-DOC	Bremer Tower, Suite 1800 445 Minnesota Street St. Paul, Minnesota 55101	Electronic Service	Yes	OFF_SL_13-316_Official CC Service List
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_13-316_Official CC Service List
Karen	Olson	karen.olson@ag.state.mn.u s	Office of the Attorney General-RUD	1400 Bremer Tower 445 Minnesota St St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_13-316_Official CC Service List
LauraSue	Schlatter	LauraSue.Schlatter@state. mn.us	Office of Administrative Hearings	600 North Robert Street St. Paul, Minnesota 55101	Paper Service	Yes	OFF_SL_13-316_Official CC Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.co m	Shaddix And Associates	Ste 122 9100 W Bloomington Bloomington, MN 55431	Paper Service Frwy	Yes	OFF_SL_13-316_Official CC Service List
Peggy	Sorum	peggy.sorum@centerpointe nergy.com	CenterPoint Energy	800 LaSalle Avenue PO Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_13-316_Official CC Service List
James M.	Strommen	jstrommen@kennedy- graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Stree Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-316_Official CC Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	Yes	OFF_SL_13-316_Official CC Service List