800 LaSalle Avenue PO Box 59038 Minneapolis, MN 55459-0038



August 24, 2015

Dr. Burl W. Haar Executive Secretary Minnesota Public Utilities Commission 121 7th Place East, Ste. 350 St. Paul, MN 55101-2147

Re: New Base Gas Cost Filing (PGA Zero-Out) for Interim Rates in CenterPoint Energy's General Rate Filing G-008/GR-15-424

Reply Comments Docket No. G-008/MR-15-728

On August 3, 2015 CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or the "Company") requested approval of a new base cost of gas to coincide with the proposed October 2, 2015 implementation of interim rates in our general rate case (Docket G008/GR-15-424). On August 17, 2015 the Minnesota Department of Commerce ("Department") filed comments in the Base Cost of Gas docket and recommended that the Commission **approve** CenterPoint's base cost of gas filing subject to CenterPoint providing Exhibit E, Attachment 3, Page 1 of 2, without rounding.

The Company has used this same 'rounding' technique in prior rate cases and apologizes for any confusion it may have caused. CenterPoint Energy believes the cost estimates used in the base cost of gas filing for commodity costs are the same as those presented in the rate case testimony. Attached is an updated version of the Exhibit without rounding, and ties to the commodity costs presented in the workpapers of Mr. Kirk Nesvig, Volume 3, Schedule 62, workpaper 2, pages 1 - 8. The \$428,363,000 in the original exhibit is replaced by the more exact value of \$428,362,617 in the attached replacement exhibit. We are available for additional questions.

If further information is required, please contact me at 612-321-5078.

Respectfully,

/s/

Marie M. Doyle Rates Analyst

cc: Attached Service List

ATTACHMENT 3 Page 1 of 2

Docket No. G-008/GR-15-424 Exhibit____(KRN-D) Schedule 61, Page 3 of 3

CenterPoint Energy Commodity Cost of Gas Recovery Rate Test Year - Twelve Months Ending September 30, 2014

Line No.	Description (a)	Test Year Sales (b)	Recovery Rate (c)	Commodity Costs (d)	
1	Total Company				
2	Residential	70,137,300	3.4897	\$244,758,136	
3	Commerical/Industrial A & B	8,019,800	3.5019	28,084,538	
4	Commerical/Industrial C	28,264,000	3.4688	98,042,163	
5	Small Dual Fuel	11,914,900	3.6059	42,963,938	
6	Large Volume Firm & Dual Fuel	4,245,800	3.4184	14,513,843	
7	Total	122,581,800		\$428,362,617	

AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)) ss. COUNTY OF HENNEPIN)

Marie M. Doyle, being first duly sworn on oath, deposes and says she served or caused to be served on behalf of CenterPoint Energy a copy of CenterPoint Energy's reply comments in its petition to establish a New Base Cost of Gas to coincide with the Implementation of Interim Rates in Docket No. G-008/GR-15-424 on the Minnesota Public Utilities Commission, the Office of Energy Security, and the Office of the Attorney General's Office-Residential Utilities Division. The filing was delivered by E-filing or delivered by hand at the respective addresses or by placing in the U.S. Mail at the City of Minneapolis.

/s/

Marie M. Doyle, Rate Analyst Regulatory Services CenterPoint Energy

Subscribed and sworn to before me this 24th Day of August, 2015

<u>/s/</u>

Mary Jo Schuh - Notary Public My Commission 1/31/2020

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	No	OFF_SL_15-728_MR-15- 728
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck, ND 585014092	Electronic Service	No	OFF_SL_15-728_MR-15- 728
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_15-728_MR-15- 728
James J.	Bertrand	james.bertrand@leonard.c om	Leonard Street & Deinard	150 South Fifth Street, Suite 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-728_MR-15- 728
Brenda A.	Bjorklund	brenda.bjorklund@centerp ointenergy.com	CenterPoint Energy	800 LaSalle Ave FL 14 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-728_MR-15- 728
Jeffrey A.	Daugherty	jeffrey.daugherty@centerp ointenergy.com	CenterPoint Energy	800 LaSalle Ave Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-728_MR-15- 728
William	Davis	N/A	Community Action of Minneapolis	505 East Grant St Ste 100 Minneapolis, Minnesota 55405	Paper Service	No	OFF_SL_15-728_MR-15- 728
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 1400	No	OFF_SL_15-728_MR-15- 728
Marie	Doyle	marie.doyle@centerpointen ergy.com	CenterPoint Energy	800 LaSalle Avenue P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_15-728_MR-15- 728
Sharon	Ferguson	sharon.ferguson@state.mn .us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_15-728_MR-15- 728

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Eric	Jensen	ejensen@iwla.org	Izaak Walton League of America	Suite 202 1619 Dayton Avenue St. Paul, MN 55104	Electronic Service	No	OFF_SL_15-728_MR-15- 728
Nicolle	Kupser	nkupser@greatermngas.co m	Greater Minnesota Gas, Inc.	202 South Main Street P.O. Box 68 Le Sueur, MN 56058	Electronic Service	No	OFF_SL_15-728_MR-15- 728
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_15-728_MR-15- 728
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_15-728_MR-15- 728
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_15-728_MR-15- 728
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-728_MR-15- 728
Greg	Palmer	gpalmer@greatermngas.co m	Greater Minnesota Gas, Inc.	PO Box 68 202 South Main Stree Le Sueur, MN 56058	Electronic Service	No	OFF_SL_15-728_MR-15- 728
LauraSue	Schlatter	LauraSue.Schlatter@state. mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, Minnesota 55164-0620	Electronic Service	No	OFF_SL_15-728_MR-15- 728
Janet	Shaddix Elling	jshaddix@janetshaddix.co m	Shaddix And Associates	Ste 122 9100 W Bloomington I Bloomington, MN 55431	Electronic Service Frwy	No	OFF_SL_15-728_MR-15- 728

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Peggy	Sorum	peggy.sorum@centerpointe nergy.com	CenterPoint Energy	800 LaSalle Avenue PO Box 59038 Minneapolis, MN 554590038	Electronic Service		OFF_SL_15-728_MR-15- 728
James M.	Strommen	jstrommen@kennedy- graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Stree Minneapolis, MN 55402			OFF_SL_15-728_MR-15- 728
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service		OFF_SL_15-728_MR-15- 728
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service		OFF_SL_15-728_MR-15- 728