

505 Nicollet Mall P.O. Box 59038 Minneapolis, MN 55459-0038

September 1, 2017

Mr. Dan Wolf Executive Secretary Minnesota Public Utilities Commission 121 East Seventh Place, Suite 350 St. Paul, MN 55101

## RE: In the Matter of the Application of CenterPoint Energy, a division of CenterPoint Energy Resources Corp., for Authority to Increase Natural Gas Rates in Minnesota Docket No. G-008/GR-13-316 Request to Extend Decoupling

Dear Mr. Wolf,

The Minnesota Public Utilities Commission (MPUC) authorized a three year pilot full decoupling program (RD Rider) for CenterPoint Energy Resources Corp, d/b/a/ CenterPoint Energy Minnesota Gas (CenterPoint Energy Minnesota Gas, or the Company) in the June 9, 2014 Order in the Company's 2013 Rate Case<sup>1</sup>. The three year full decoupling pilot will end on June 30, 2018; however, the RD Rider adjustment for the last evaluation period is expected to be in effect from September 1, 2018 to August 31, 2019 with a final true-up.

The Company filed a general rate case on August 2, 2017<sup>2</sup> which included a request to continue the full decoupling program as a regular feature of the Company's tariffs.<sup>3</sup> However, we recognize a final order in the 2017 Rate Case is not expected before the end of the last Evaluation Period. Therefore, absent Commission action, the RD rider will expire on June 30, 2018. As such, the Company is filing this *Request to Extend Decoupling* until the Commission makes a final determination regarding the RD Rider in the 2017 rate case<sup>4</sup>.

As discussed in the 2017 Rate Case, the RD Rider is a critical component of the Company's and Minnesota's energy conservation efforts. The RD Rider removes the financial disincentive to the Company of pursuing conservation and thereby helps to achieve the State's goals related to energy conservation.

Extending the Company's current decoupling pilot until such time as the Commission makes a final decision on decoupling in the rate case avoids the potential of a "gap" in the decoupling program which could be both confusing to customers and harmful to the Company. Therefore, the Company believes this short extension of the current decoupling pilot is both reasonable and in the public interest.

<sup>&</sup>lt;sup>1</sup> Docket No. G-008/GR-13-316.

<sup>&</sup>lt;sup>2</sup> Docket No. G-008/GR-17-285.

<sup>&</sup>lt;sup>3</sup> See the testimony of Mr. Burl Drews.

<sup>&</sup>lt;sup>4</sup> Additionally, the Company has also filed its second Evaluation Report concurrently with this *Request to Extend Decoupling*.

If you have any questions or require additional information, please contact me at (612) 321-4625 or <u>Peggy.Sorum@CenterPointEnergy.com</u>.

Sincerely,

/s/

Peggy Sorum Manager – Regulatory Financial Activities CenterPoint Energy

Enclosures cc: Service List

## AFFIDAVIT OF SERVICE

STATE OF MINNESOTA ) ) ss. COUNTY OF HENNEPIN )

Marie Doyle, being first duly sworn on oath, deposes and says she served the foregoing document on the attached list of persons by e-filing and depositing a true and correct copy thereof, with postage paid in the United States mail at City of Minneapolis, Minnesota to those on the service list requesting paper service.

<u>/s/</u> Marie Doyle

Subscribed and sworn to before me This 1<sup>st</sup> day of September, 2017

<u>/s/</u>\_\_\_\_\_

Melodee S Carlson Chang Notary Public

My Commission Expires 1/31/2019

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	SPL_SL_13- 316_Potentially Interested Persons
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