COMMERCE DEPARTMENT

June 20, 2019

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G008/M-19-342

Dear Mr. Wolf:

Attached are the Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

> Petition of CenterPoint Energy for Approval of a Continued Variance from the Commission's Automatic Adjustment Rules Related to the Recovery of Demand Costs.

The Petition was filed on May 21, 2019 by:

> Donald Wynia
> Regulatory Analyst, Regulatory Services
> CenterPoint Energy
> 505 Nicollet Mall
> Minneapolis, MN 55402
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> Donald.Wynia@CenterPointEnergy.com

The Department recommends that the Commission **approve, in part, CenterPoint Energy's Petition.** The Department is available to answer any questions that the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ GEMMA MILTICH
Financial Analyst

GM/ja
Attachment

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce
Division of Energy Resources

Docket No. G008/M-19-342

I. INTRODUCTION

In its October 27, 2000 *Order* in Docket No. G008/M-00-980, the Minnesota Public Utilities Commission's (Commission) granted CenterPoint Energy's (CenterPoint or the Company) request for a 3-year pilot program, the purpose of which was to reduce the over- or under-recovery of approved demand costs due to deviations from average weather conditions during the gas year (July 1 through June 30). CenterPoint's request required a variance to Minnesota Rules 7825.2700, subpart 5[1] in order to impose a monthly demand cost adjustment factor on the Company's customers. Subsequent to its initial approval, the Commission approved a continuation of the pilot program and the related rule variance six times, most recently in its May 17, 2016 *Order* in Docket No. G008/M-16-228.[2]

On May 21, 2019, CenterPoint submitted a filing (Petition) requesting that the Commission approve a permanent variance from the Annual Automatic Adjustment (AAA) Rules, specifically, Minnesota Rule 7825.2700, subpart 5. The requested variance would allow the Company to make monthly adjustments to its demand cost recovery rate calculations indefinitely. If a permanent variance is not permitted, the Company has asked that the Commission approve a 5-year variance instead.

II. DEPARTMENT ANALYSIS

The Minnesota Department of Commerce, Division of Energy Resources (Department) reviewed the Petition to determine whether CenterPoint's request is reasonable under the circumstances and in compliance with applicable statutes, rules, and Commission orders. The Department also

[1] Minnesota Rules, part 7825.2700, subpart 5 states: "The demand adjustment is the change in the annual demand rate which results from a difference between the demand-delivered gas cost and the demand base cost. In the event the demand-delivered gas cost does not change, the demand adjustment must be recalculated for each 12-month period from the date of the last change. The adjustment must be computed using test year demand volumes for three years after the end of the utility's most recent general rate case test year. After this time period, the demand adjustment must be computed on the basis of annual demand volume. If a customer class is billed separately for demand, the demand adjustment must be computed on the basis of the demand component of the rate for that class and applied to the demand charge."

[2] Previous extensions were granted in Docket Nos. G008/M-03-782, G008/M-05-1196, G008/M-07-1063, G008/M-10-857, and G008/M-13-728.

reviewed the Petition Exhibits A, B, C, and D to ascertain whether any significant trends or changes are observable in the Company's relevant demand cost recovery data. The following discussion provides background information on demand cost recovery and the requested variance, details around CenterPoint's demand adjustment mechanism and current proposal, and the Department's evaluation of this matter.

A. OVERVIEW OF DEMAND COST RECOVERY AND PURPOSE OF REQUESTED VARIANCE

Demand cost expenses are, for the most part, fixed costs paid by a utility to interstate pipelines. These costs are recovered by the utility on a volumetric basis from customers through the purchased gas adjustment (PGA) mechanism, and the annual per-unit cost recovery amount is calculated on weather-normalized sales for an average year. Matching demand cost expense and demand cost recovery is inherently difficult, because actual weather typically deviates on a monthly and annual basis from the weather-normalized averages on which the demand cost recovery is based. When actual weather causes natural gas usage to deviate from the weather-normalized volume, the amount recovered deviates from the forecasted amount. In a colder than normal year with high natural gas usage, the demand costs will be *over*-recovered, because more units than forecasted are sold; in a warmer than normal year with low natural gas usage, the demand costs are *under*-recovered, as fewer units than forecasted are sold. The larger the deviation of actual weather from average weather, the greater the magnitude of demand cost over- or under-recovery.

Commission rules provide for an annual September 1 "true-up" to the PGA to ensure that over- or under-recovery is periodically reconciled. However, because this process occurs only annually, there may be significant cost shifting between years, as well as time-value financial effects for the Company and customers. As allowed by the variance, CenterPoint customers receive credits or charges on their natural gas bill in the *current* year for the current year demand costs, rather than 12 to 14 months later through the PGA process.

The previously approved variances to Minnesota Rule 7825.2700, subpart 5 have allowed the Company to better match its demand cost expense and recovery, reducing the annual over- or under-recovery of demand costs caused by deviations of actual from average weather conditions. Under the rule variance, CenterPoint has been permitted to make monthly adjustments to its demand cost recovery rate from October through May of each gas year. These monthly adjustments reflect actual demand cost recovery during a gas year, thereby bringing the demand-recovery rate in line with the demand recovery needs of the Company more quickly than would otherwise be allowed under the Commission rules. CenterPoint's current variance request would serve the same purpose as those previously granted.

B. CRITERIA REQUIRED TO GRANT VARIANCE FROM A MINNESOTA RULE

Minnesota Rule 7829.3200 outlines three conditions that must be met in order for the Commission to grant a variance to a Minnesota rule. In its prior related petitions, CenterPoint has provided, and the Commission has accepted, relatively consistent supporting reasoning as to why the Company's requests met the criteria required for Commission approval of a rule variance. In its current Petition, the Company continues to assert that its proposal meets the relevant standards detailed in Minnesota Rule 7829.3200. The following sections 1 – 3 provide a discussion around the three criteria to be considered by the Commission in determining whether it may grant a rule variance as requested.

1. Enforcement of the Rule Would Impose an Excessive Burden upon the Applicant or Others Affected by the Rule

According to CenterPoint, enforcement of the demand cost recovery rule imposes an excessive burden on both customers *and* the Company. Customers over-pay the Company for natural gas when the weather is colder than normal, and the Company under-recovers demand costs from customers when the weather is warmer than usual. Under the AAA Rules, customers or the Company, depending on the weather patterns, must carry the "burden" of the over- or under-recovery until the annual true-up process corrects the over- or under-recovered demand cost.

The Department believes that approval of CenterPoint's current proposal to extend this rule variance would likely result in a better timing match between demand costs incurred and demand costs recovered and lead to smaller over- or under-recoveries for the Company. Smaller over- or under-recoveries reduce the shifting of costs among customers from year to year and between the Company and its customers. Reducing this cost shifting diminishes the financial time-value implications surrounding demand cost recovery.

2. Granting the Variance Would not Adversely Affect the Public Interest

The Company asserted that the public interest will be unharmed by a continuation of the variance. CenterPoint emphasized that its proposal would not change the *total* amount of demand cost recovery; rather, the rule variance, if granted, would simply improve the timeliness with which demand costs incurred and recovered are matched. The Department agrees with the Company that continuation of the variance would not adversely affect the public interest and would allow the Company to set service prices that more accurately reflect current demand costs.

3. Granting the Variance Would not Conflict with Standards Imposed by Law

Like CenterPoint, the Department is not aware of any laws that would be violated by granting the variance.

C. PERFORMANCE OF CENTERPOINT'S DEMAND ADJUSTMENT MECHANISM

In its Petition, CenterPoint provided an analysis of the performance of its demand adjustment mechanism over the past 18 years. The Company explained that its method of calculating demand cost recovery rates has provided a closer match between demand costs incurred and recovered for the majority of years during which the rule variance has been in effect. The Petition exhibits present details on the impacts that the demand adjustment mechanism has had on customers and the Company over time. Based on its review of the relevant data, the Department agrees with CenterPoint that, overall, the Company's demand rate adjustment methodology has achieved its intended purpose and demonstrated success in reducing the magnitude of annual demand cost over- or under-recoveries. The Department did not note any new areas or trends of significant concern in the applicable data included in CenterPoint's Petition.

1. Petition Exhibit A: Actual Historical Demand Cost Over- and Under-Recoveries

Petition Exhibit A shows the actual historical over- and under-recovery of demand costs between gas years 1990-91 and 2017-18. The Company reported a 3.5 percent average difference between its incurred and recovered demand costs over the years in which the Company applied its demand cost adjustment mechanism; by comparison, a 7.7 percent average difference is seen over the years prior to implementing the mechanism. The average absolute value of demand cost over- or under-recovery was $5,953,413[3] less per year following the implementation of the Company's demand adjustment mechanism.

2. Petition Exhibit B: Hypothetical Demand Cost Over- and Under-Recoveries

Petition Exhibit B provides a comparison of hypothetical over- and under-recovery of demand costs with and without the demand cost adjustment mechanism from gas year 2000-01 through 2017-18. Averaged over all years documented, the Company's cost recovery deviation from total demand costs has averaged 3.8 percent; in contrast, without the demand adjustments, the deviation is estimated at 7.2 percent.[4]

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[3] ($8,928,548 – $2,975,135) = $5,953,413; figures in this calculation were retrieved from Petition Exhibit A.

[4] It may appear as though the "demand cost recovery with the demand cost adjustment" should tie between Exhibit A and Exhibit B in CenterPoint's Petition; however these two exhibits present different information. Exhibit A is a summary of all demand-cost transactions that occurred in a given year, and therefore reflects actual recovery. Exhibit B, originally developed by the Department of Commerce (previously the Office of Energy Security) in Docket No. G008/M-07-1063 as an analytical tool, presents hypothetical outcomes given certain assumptions about consumption volumes and different demand-cost recovery rates. Exhibit D also reflects the methodology used in Exhibit B. These differences in recovery amounts arise from factors such as cancelled sales, re-billings, and differences in billing cycles from calendar months. Please see page 7 of the Department's September 13, 2010 Comments in Docket G008/M-10-857 for further discussion on these exhibits.

The three most recent gas years following CenterPoint's last related petition[5] have had mixed results under the Company's application of the demand adjustment mechanism. In gas year 2017-18, CenterPoint's demand adjustment successfully reduced the absolute value of the deviation from required demand cost recovery by 9.3 percentage points. Exhibit B also shows, however, that in gas years 2015-16 and 2016-17, the Company's demand adjustment methodology did *not* result in smaller over- or under-recoveries of demand costs than would otherwise have been incurred if the Company had followed the AAA Rules as written. Instead, for both 2015-16 and 2016-17, CenterPoint under-recovered a larger amount than it would have under the standard AAA Rules. These under-recoveries are at least partially attributable to the warmer than normal weather conditions that occurred throughout the relevant time period. In addition to gas years 2015-16 and 2016-17, there have been four other previous years in which the mechanism did not reduce the Company's over- or under-recovery:

- 2003-04: The increased under-recovery was relatively small. Neither CenterPoint nor the Department could identify a reason for the unexpected outcome, although the Company suggested possible causes;

- 2006-07: A substantial reduction in demand costs occurred in 2006-07 due to increased capacity-release credits. The magnitude of these credits was not fully known until May 2007, creating a timing difference between implementation of reduction in demand costs into billing rates and actual demand costs;

- 2007-08: The demand rate adjustment was not applied for the entire heating season. The request for continuation of the program was not approved until December 24, 2007, therefore allowing three months of the program to pass without an adjustment.

- 2012-13: CenterPoint attributed its large over-recovery to abnormal weather. The Company stated that the weather from July 2012 through February 2013 was slightly warmer than the latest 20-year average, but March through May 2013 was more than 20 percent colder than normal.

While the demand cost recovery results reported by the Company have fluctuated from year to year, the Company would have over- or under-recovered a *larger* amount in twelve out of the sixteen complete years[6] reported without the use of its demand adjustment mechanism authorized under the rule variance.

In its Review of the 2016-17 and 2017-18 Annual Automatic Adjustment Reports in Docket Nos. G008/AA-17-668 and G008/AA-18-573, respectively, the Department documented and analyzed the dollar amount and percentage of demand cost over- or under-recovery for each regulated natural gas utility. For comparison purposes, the Department has compiled the relevant data into the following Table 1.

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[5] Docket No. G008/M-16-228.
[6] Gas years 2007-08 and 2010-11 were reported as partial years.

**Table 1: Demand Cost Over/(Under) Recovery Comparison
For Regulated Gas Utilities in the 2016-17 and 2017-18 Gas Years**

Utility	**2016-17 Gas Year[7]**		**2017-18 Gas Year[8]**	
	Over/(Under) Demand Cost Recovery in Dollars ($)	*Percentage (%) Deviation of Demand Cost Recovery from Actual Demand Costs*	*Over/(Under) Demand Cost Recovery in Dollars ($)*	*Percentage (%) Deviation of Demand Cost Recovery from Actual Demand Costs*
Greater Minnesota Gas Inc. (GMG)	139,060	19.01	14,314	1.55
Great Plains Natural Gas Co. (GPNG) North District	(172,119)	10.24		
GPNG South District	(267,907)	5.08	145,827[9]	4.27
Minnesota Energy Resources Corp. (MERC) Northern Natural Gas	(869,086)	4.31		
MERC Albert Lea	(18,895)	1.45	3,344,249[10]	15.71
MERC Consolidated	595,838	1.98	1,185,304	42.01
CenterPoint	(7,069,846)	8.21	(2,288,575)	2.67
Northern States Power Co. (Xcel Gas)	(996,916)	2.09	4,167,485	8.76

Table 1 shows that for the 2016-17 gas year, CenterPoint under-recovered its demand costs in the largest dollar amount compared to the other utilities; however, the Company's percentage of under-recovery was less than the corresponding percentages for Greater Minnesota Gas, Incorporated and Great Plains Natural Gas Company (North District). During the 2017-18 gas year, CenterPoint under-recovered its demand costs by significantly smaller dollar and percentage figures compared to the prior year; the Company reported the second lowest percentage of over- or under-recovery at 2.67 percent, after the 1.55 percent reported by Greater Minnesota Gas, Inc. For gas years 2016-17 and 2017-18, the Department concludes that CenterPoint's demand cost recovery deviates from actual costs at a reasonable level relative to the Company's peer natural gas utilities.

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[7] Table 1 data for the 2016-17 gas year was taken from the Department's Report, filed December 4, 2018, in Docket No. G008/AA-17-668 as follows: GMG at page 15, GPNG at pages 19 and 20, MERC at pages 25 and 26, CenterPoint at page 31, and Xcel Gas at page 39.

[8] Table 1 data for the 2017-18 gas year was taken from the Department's Report, filed April 25, 2019, in Docket No. G008/AA-18-573 as follows: GMG at page 16, GPNG at page 20, MERC at pages 24 and 25, CenterPoint at page 30, and Xcel Gas at page 38.

[9] Beginning July 1, 2017, GPNG consolidated its North and South Districts into a single PGA system.

[10] Beginning on July 1, 2017, MERC combined its Northern Natural Gas and Albert Lea systems into a single PGA system.

3. Petition Exhibit C: Demand Cost Adjustment Charges and Credits to Customers

Exhibit C of the Petition presents a breakdown of each gas year by month from 2000-01 through 2017-18, showing the demand adjustments and charges or credits applied to residential heating customer bills. The largest monthly dollar adjustment to the average residential customer bill was applied during the 2000-01 gas year in a credit amount of $5.34; the largest monthly adjustment as a percentage of the average residential customer bill was 4.8 percent during the 2001-02 gas year. The data in Exhibit C indicates that the Company's demand adjustment mechanism has not created significant volatility around customer billing.

4. Petition Exhibit D: Hypothetical Demand Cost Recovery with and without a One-Month Lag

As originally approved, CenterPoint implemented the demand adjustment calculation using a one-month lag in sales data. With the one-month lag, the demand adjustment for a given month did *not* include the sales of the immediately preceding month. For example, the adjustment calculation for February was based on sales data through December and *excluded* January's sales data. However, the Commission's December 11, 2013 *Order* in Docket No. G008/M-13-728 allowed CenterPoint to remove the one-month lag in sales from its calculation and instead estimate the current month's total throughput using daily sales.[11] In conjunction with this calculation change, the Commission required CenterPoint to report the results of the Company's monthly demand adjustment compared to a hypothetical demand cost recovery rate reflecting a one-month lag. CenterPoint provided this comparison in Petition Exhibit D using the procedures approved in Docket No. G008/M-05-1196. The reported data show that, hypothetically, eliminating the one-month lag reduced the Company's average over- or under-recovery from 4.1 percent to 3.2 percent.

D. CURRENT REQUEST DETAILS

In its Petition, CenterPoint requested approval for a permanent variance to Minnesota Rule 7825.2700, subpart 5, with the caveat that if a permanent variance is not permitted, the Company would like a 5-year variance granted instead. If the Commission approves a permanent variance, the Company would calculate its current demand adjustment on a monthly rather than annual basis, indefinitely.

The Company proposed to continue using essentially the same methodology to calculate the demand adjustment as it has in past years, including the provision for capacity release credits[12] and removal of the one-month lag in sales data.[13] CenterPoint would also continue to calculate and apply the demand adjustment from October through May of each gas year.

[11] Sales for the current month are based on actual sales through approximately the 28th of the month; the Company then estimates the sales for the final few days of the month.
[12] Approved in Docket No. G008/M-07-1063.
[13] Approved in Docket No. G008/M-13-378.

Because extremely abnormal weather could cause the demand adjustment amount to be large, CenterPoint proposed to mitigate this risk by continuing to cap the monthly demand adjustment amount at 25 percent of the demand cost recovery rate, which is reported in the Company's monthly PGA.

In addition, CenterPoint proposed to continue its compliance with existing reporting and evaluation requirements. These requirements include:

- Reporting in CenterPoint's monthly PGA filings the detailed calculations of the demand adjustment;
- Reporting in CenterPoint's AAA Report a summary of the results of the over/(under) recovery with and without the proposed additional demand recovery adjustment. The summary will reflect the method of calculating this analysis as the Commission ordered in Docket No. G008/M-05-1196; and
- Reporting in CenterPoint's AAA Filing the results of the Company's monthly demand adjustment compared to a hypothetical demand-cost recovery rate that reflects a one-month lag.

E. DEPARTMENT'S CONCLUSION ON THE REASONABLENESS OF CENTERPOINT'S REQUEST

Based on the demand cost recovery data reported by CenterPoint, the Department continues to believe that the Company's demand adjustment mechanism has, overall, operated as intended and improved the timeliness with which CenterPoint's demand costs incurred and recovered are matched. The Department therefore supports CenterPoint's request for a continuation of the previously granted variance to Minnesota Rule 7825.2700, subpart 5, but opposes the Company's proposal that the variance be granted permanently.

Approving a permanent rule variance in this case would indicate that a monthly demand cost adjustment method will continue to be equally valid or superior to the methodology outlined in the AAA Rules on a permanent basis. Although the Department acknowledges the generally positive impact of CenterPoint's demand adjustment mechanism on its demand cost recovery, we also recognize that in some of the gas years documented, larger over- or under-recoveries accumulated under the Company's approach compared to the over- or under-recoveries that would have been accumulated under the AAA Rules. Because the Company's demand cost recovery data show mixed results, the Department cannot confidently recommend that the Commission permanently accept the Company's methodology over the authority of the relevant Minnesota rule. In addition, the Department places trust in the Minnesota Rules resulting from the Commission's robust rulemaking process and does not see a need for a permanent rule variance in this instance.

A temporary rule variance, on the other hand, requires the Department and Commission to periodically review the appropriateness of the variance and adjust the corresponding recommendations and decisions as necessary. While the Department does review data relevant to CenterPoint's monthly demand adjustment mechanism in the Company's annual AAA filings, we believe that the additional check provided by CenterPoint's periodic request for a continuation of this rule variance is a valuable opportunity to assess whether the variance continues to be reasonable. The Department concludes that it is most prudent at this time to continue to monitor and periodically reevaluate CenterPoint's demand adjustment approach and the corresponding rule variance.

In its Petition, CenterPoint asked that the Commission approve a 5-year variance if a permanent rule variance was not permitted. While the Department does not oppose the Company's 5-year variance request, we do note that the Commission has typically approved rule variances of 3 years or less in the previous petitions related to this matter.[14] For purposes of consistency and to prompt a reevaluation of this rule variance before 5 years has passed, the Department would prefer that the Commission grant CenterPoint a 3-year variance to Minnesota Rule 7825.2700, subpart 5.

The Department further concludes that the Company's proposal to calculate its demand adjustment in essentially the same manner and with the same parameters as previously approved by the Commission is reasonable. The Department also appreciates the Company's willingness to continue following the previously approved reporting requirements and intends to continue to carefully review the information provided by the Company in this matter.

III. DEPARTMENT CONCLUSIONS AND RECOMMENDATIONS

Based on its review, the Department recommends that the Commission:

- Deny CenterPoint's request for a permanent variance to Minnesota Rule 7825.2700, subpart 5.

- Grant CenterPoint a variance to Minnesota Rule 7825.2700, subpart 5 for a period of:
    - 3 years (Department preferred) **OR**
    - 5 years (CenterPoint preferred)

- Allow CenterPoint to continue to calculate a monthly demand adjustment to the Company's demand-cost recovery rate as approved in Docket No. G008/M-07-1063 and updated in Docket No. G-008/M-13-728, including the provision regarding capacity-release credits and removal of the one-month lag.

[14] The Commission granted CenterPoint a 2-year variance in Docket No. G008/M-05-1196. The Commission granted CenterPoint a 3-year variance in Docket Nos. G008/M-07-1063, G008/M-10-857, G008/M-13-728, and G008/M-16-228.

- Require CenterPoint to continue to cap the maximum monthly allowed demand adjustment at 25 percent of the demand cost recovery rate.

- Require CenterPoint to continue to report the information pertaining to the operation of the program, including:
    - Reporting in CenterPoint's monthly PGA filings the detailed calculations of the demand adjustment;
    - Reporting in CenterPoint's AAA Report a summary of the results of the over/(under) recovery with and without the proposed additional demand recovery adjustment. The summary will reflect the method of calculating this analysis as the Commission ordered in Docket No. G008/M-05-1196; and
    - Reporting in CenterPoint's AAA Filing the results of the Company's monthly demand adjustment compared to a hypothetical demand-cost recovery rate that reflects a one-month lag.

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CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. G008/M-19-342

Dated this 20th day of June 2019

/s/Sharon Ferguson

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