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PUBLIC DOCUMENT

Trade Secret Information has been Excised

November 1, 2018

Mr. Daniel Wolf
Executive Secretary
Minnesota Public Utilities Commission 350
Metro Square Building
121 East Seventh Place, Suite 350
St. Paul, Minnesota 55101-2147

**Re: CenterPoint Energy 's Request for Change in Demand Units, Supplemental Filing
Docket No. G008/M-18-462**

Dear Mr. Wolf:

Enclosed please find revisions to several exhibits of the CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas (Company or CenterPoint Energy) Request for Change in Demand Units. On July 2, 2018, in Docket No. G008/M-18-462, the Company filed a request for Change in Demand Units. Herein, the Company provides supplemental information that updates items in the Demand portfolio since the initial filing.

Under the terms of the Company's new Northern Natural Gas contract, the Company will no longer need to update its Base/Variable entitlement split annually in November.

Supplier Demand:

In the present filing, CenterPoint Energy has updated its Supplier Demand / Seasonal Reservation portfolio for the 2018-2019 Winter season.

CenterPoint Energy updated its annual supplier demand profile, which contains contracts for seasonal swing supplies. The expenses are due regardless of how much gas is called upon over the winter season, and costs are allocated 75% to Demand and 25% to Commodity as required in the February 28, 2012 Commission Order in the G-008/M-11-1078 Demand Entitlement docket, ordering point 7. The Company notes that reservation fees are higher than last winter due to the cold-weather price-spikes that occurred last heating season. Changes will be reflected in the Company's November 2018 Purchased Gas Adjustment billing rates.

Reserve Margin:

CenterPoint Energy's reserve margin for the 2018-2019 winter season is lower than it was for the 2017-2018 winter season. This is due to growth in customer demand and the fact that additional pipeline capacity will not be available until November 2019. The Company considered contracting for additional winter supply to be delivered to its facilities, but determined that it has planned for sufficient capacity and gas supply without additional contracting.

As discussed in the initial estimate filed on July 2, 2018, the overall demand costs have increased about \$8.859 million when compared to the annual demand costs billed in the year ended October 2018. The per-dekatherm bill impact has increased from \$0.7996/Dth to \$0.8597/Dth, or about \$5.35 annually for an average annual customer bill using 890 therms, which is the final use-per-customer sales volume estimate authorized in the Company's 2017 Rate Case - Docket No. G008/GR-17-285.

Estimate of Annual Demand Costs

October	89.0 x \$0.7996 =	\$71.16 per year before "smoothing" adjustment
November	89.0 x \$0.8597 =	\$76.51 per year before "smoothing"
Difference		\$ 5.35 per year

CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas has designated information in this document as trade secret. Specifically, Exhibit A, pages 1 and 2, and Exhibit C, page 2.

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, including protecting it from disclosure in this document; and (3) the protected information contains gas supply contract 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.

The attached pages detail the implementation of CenterPoint Energy's 2017-2018 Heating Season Supply Plan. Please contact me at (612) 321-5078 if you have any questions.

Sincerely,

/s/ _____

Marie M. Doyle

Regulatory Analyst

Regulatory Services

Marie.Doyle@CenterPointEnergy.com

**Filing Upon a Change in Demand
Minn. Rule 7829.1300, Subp. 2**

CenterPoint Energy Summary of Exhibits

EXHIBIT A Page 1 *Annual Demand Cost Calculation - Proposed November 1, 2018
Page 2 *Annual Demand Cost Calculation - Effective October 1, 2018

EXHIBIT B Additional Information Request from the Department of Commerce Additional
information pursuant to the Department's request to all utilities concerning
demand entitlement changes dated October 1, 1993.

page 4 Revised - Historic gas price change comparisons – Bill Impact

EXHIBIT C Supporting documentation
Page 2 - * Supplier Demand Profile

NOTE: “*” denotes Non-Public Document

EXHIBIT A, Page 1 of 2

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- | | |
|---|---|
| A | NEW NNG CONTRACT - new levels of Entitlement Discounted/Non-discounted |
| B | New Discount rates |
| C | Corrected Rate - at Tariffed rate |
| D | Values subject to update in the November 2018 supplemental filing |
| E | NGPL - NGPL Rate Case Final Rate implementation affected a small portion of the NGPL Storage cost |
| F | Zero out off system credits |
| G | UPDATED per 2017 Rate Case: (KRN-WP), Sch. 38, Workpaper 5, page 2 - Effective with Final Rates G-008/GR-17-285 |
| H | UPDATED per 2017 Rate Case (Settlement Firm Sales volume- 10 YR WN Assumption) - effective with Final Rates G-008/GR-17-285 |

EXHIBIT A, Page 2
CenterPoint Energy - Minnesota Gas
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Rows marked
with an "X" are
considered
Trade Secret

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Plus: Propane Costs	\$226,795
Annual Estimated Demand Expense	\$86,514,194
Divided by: Annual Demand Volume (2015 Rate Ca	1,082,024,750
Rate	\$0.07996
Docket G-008/M-13-728 Demand Adjust	\$0.01610 3
Final Demand Rate	\$0.09606

Notes:

3 - Demand smoothing (Only in effect October through May)

**CenterPoint Energy Minnesota Gas
Demand Entitlement: 2018-2019**

**Exhibit B4
Historic Price Change Comparison**

	Last Rate Case (G008/MR-17- 591 and GR- 17-285)	Last Demand Change (G008/M-17- 533) (11/2017)	October 1, 2018	November 2018 PGA (M-18-462)	Change From Last Rate Case	Change From Last Demand Change	Percent Change (%) From Most Recent PGA	Change (\$) From Most Recent PGA
Residential								
Commodity Cost of Gas (WACOG) (4)	\$3.2426	\$3.0003	\$2.8937	\$3.4556	6.57%	15.18%	19.42%	\$0.5619
Demand Cost of Gas (1)	\$0.7984	\$0.8022	\$0.7996	\$0.8597	7.68%	7.17%	7.52%	\$0.0601
Commodity Margin (2) (3) (5)	\$2.2201	\$2.2201	\$2.1089	\$2.1477	-3.26%	-3.26%	1.84%	\$0.0388
Total Cost of Gas	\$6.2611	\$6.0226	\$5.8022	\$6.4630	3.22%	7.31%	11.39%	\$0.6608
Average Annual Usage (Dk)	100	100	100	100				
Average Annual Total Cost of Gas	\$626.11	\$602.26	\$580.22	\$646.30	3.22%	7.31%	11.39%	\$66.08
Average Annual Total Demand Cost of Gas								\$6.01

	Last Rate Case (G008/MR-17- 591 and GR- 17-285)	Last Demand Change (G008/M-17- 533) (11/2017)	October 1, 2018	November 2018 PGA (M-18-462)	Change From Last Rate Case	Change From Last Demand Change	Percent Change (%) From Most Recent PGA	Change (\$) From Most Recent PGA
Commercial/Industrial Firm - A								
Commodity Cost of Gas (WACOG) (4)	\$3.2426	\$3.0003	\$2.8937	\$3.4556	6.57%	15.18%	19.42%	\$0.5619
Demand Cost of Gas (1)	\$0.7984	\$0.8022	\$0.7996	\$0.8597	7.68%	7.17%	7.52%	\$0.0601
Commodity Margin (2) (3) (5)	\$2.2211	\$2.2211	\$2.1099	\$2.1649	-2.53%	-2.53%	2.61%	\$0.0550
Total Cost of Gas	\$6.2621	\$6.0236	\$5.8032	\$6.4802	3.48%	7.58%	11.67%	\$0.6770
Average Annual Usage (Dk)	80	80	80	80				
Average Annual Total Cost of Gas	\$500.97	\$481.89	\$464.26	\$518.42	3.48%	7.58%	11.67%	\$54.16
Average Annual Total Demand Cost of Gas								\$4.81

	Last Rate Case (G008/MR-17- 591 and GR- 17-285)	Last Demand Change (G008/M-17- 533) (11/2017)	October 1, 2018	November 2018 PGA (M-18-462)	Change From Last Rate Case	Change From Last Demand Change	Percent Change (%) From Most Recent PGA	Change (\$) From Most Recent PGA
Commercial/Industrial Firm - B								
Commodity Cost of Gas (WACOG) (4)	\$3.2426	\$3.0003	\$2.8937	\$3.4556	6.57%	15.18%	19.42%	\$0.5619
Demand Cost of Gas (1)	\$0.7984	\$0.8022	\$0.7996	\$0.8597	7.68%	7.17%	7.52%	\$0.0601
Commodity Margin (2) (3) (5)	\$1.8293	\$1.8293	\$1.7181	\$1.7529	-4.18%	-4.18%	2.03%	\$0.0348
Total Cost of Gas	\$5.8703	\$5.6318	\$5.4114	\$6.0682	3.37%	7.75%	12.14%	\$0.6568
Average Annual Usage (Dk)	2,860	2,860	2,860	2,860				
Average Annual Total Cost of Gas	\$16,789.06	\$16,106.95	\$15,476.60	\$17,355.05	3.37%	7.75%	12.14%	\$1,878.45
Average Annual Total Demand Cost of Gas								\$171.89

	Last Rate Case (G008/MR-17- 591 and GR- 17-285)	Last Demand Change (G008/M-17- 533) (11/2017)	October 1, 2018	November 2018 PGA (M-18-462)	Change From Last Rate Case	Change From Last Demand Change	Percent Change (%) From Most Recent PGA	Change (\$) From Most Recent PGA
Commercial/Industrial Firm - C								
Commodity Cost of Gas (WACOG) (4)	\$3.2426	\$3.0003	\$2.8937	\$3.4556	6.57%	15.18%	19.42%	\$0.5619
Demand Cost of Gas (1)	\$0.7984	\$0.8022	\$0.7996	\$0.8597	7.68%	7.17%	7.52%	\$0.0601
Commodity Margin (2) (3) (5)	\$1.6982	\$1.6982	\$1.5870	\$1.5795	-6.99%	-6.99%	-0.47%	(\$0.0075)
Total Cost of Gas	\$5.7392	\$5.5007	\$5.2803	\$5.8948	2.71%	7.16%	11.64%	\$0.6145
Average Annual Usage (Dk)	14,300	14,300	14,300	14,300				
Average Annual Total Cost of Gas	\$82,070.56	\$78,660.01	\$75,508.29	\$84,295.64	2.71%	7.16%	11.64%	\$8,787.35
Average Annual Total Demand Cost of Gas								\$859.43

	Commodity Change (\$/Dk)	Commodity Change (Percent)	Demand Change (\$/Dk)	Demand Change (Percent)	Total Change (\$/Dk)	Total Change (Percent)
Summary						
Change from most recent PGA						
Customer Class						
Residential	\$0.5619	19.42%	\$0.0601	7.52%	\$66.08	11.39%
Commercial/Industrial Firm A	\$0.5619	19.42%	\$0.0601	7.52%	\$54.16	11.67%
Commercial/Industrial Firm B	\$0.5619	19.42%	\$0.0601	7.52%	\$1,878.45	12.14%
Commercial/Industrial Firm C	\$0.5619	19.42%	\$0.0601	7.52%	\$8,787.35	11.64%

(1) Does not include Demand Smoothing Adjustment

(2) Does not reflect Decoupling, GAP, Interim or GCR Factors.

(3) 2015 Rate Case - tariff value for Last Rate Case and Last Demand Change. Reflect base rate plus CCRA (\$0.1553/DT)

(4) Actual WACOG for historical timeframes / 2017 Rate Case Base value in Settlement for Nov. 2018

(5) Actual Billed for historical (Base+CCRA) / 2017 Rate Case Base settled tariff value and proposed CCRA (\$0.0441/DT)- Nov 2018

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AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)

) ss.

COUNTY OF HENNEPIN)

Marie Doyle, being first duly sworn on oath, deposes and says she served via e filing or caused to be served electronically on behalf of CenterPoint Energy: its Supplemental Request for Change in Demand Units for the 2018-2019 heating season on the Minnesota Public Utilities Commission; on the Department of Commerce and; on the Office of the Attorney General – Residential Utilities Division; and on those on the attached service list requesting service electronically. A p a p e r c o p y was served on persons on the enclosed service list requesting paper, by delivering by hand at the respective addresses on the list or by placing in the U.S. Mail at the City of Minneapolis.

/s/

Marie Doyle
Regulatory Analyst, Regulatory Services
CenterPoint Energy

Subscribed and sworn to before me
this 1st day of November, 2018

/s/ Mary Jo Schuh

Notary Public

Term expires: 01/31/2020

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