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January 14, 2019

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,  
Docket No. G008/M-18-462 – REPLY COMMENTS**

Dear Mr. Wolf:

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint Energy", "CPE", or the "Company") has reviewed the December 31, 2018, Comments of the Minnesota Department of Commerce ("Department" or "DOC") on CenterPoint Energy's Request for approval of a change in demand units effective November 1, 2018.

The Department recommends the Commission allow CenterPoint Energy to recover associated demand costs through the monthly Purchased Gas Adjustment (PGA) effective November 1, 2018, and require the Company to credit any market support payments received from Northern Natural Gas ("NNG" or Northern") through the PGA for the duration of the Northern Precedent Agreement. The Company agrees with the Department's recommendations.

The Department also requested that CenterPoint Energy provide information regarding its total entitlement level, reserve margin, and procurement planning in its Reply Comments.

The Company appreciates the Department's review, and herein provides the requested information for the Department's consideration.

Please contact me at (612) 321-5078 or at the email address below if you have any questions.

Sincerely,

/s/ \_\_\_\_\_  
Marie Doyle  
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**STATE OF MINNESOTA**  
**BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**  
121 Seventh Place East, Suite 350  
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Dan Lipschultz  
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Vice Chair  
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Commissioner  
Commissioner

In the Matter of CenterPoint Energy Minnesota  
Gas' Request for a Change in Demand Units

Docket No. G-008/M-18-462  
**REPLY COMMENTS**

CenterPoint Energy Minnesota Gas has reviewed the comments filed on December 31, 2018, by the Department of Commerce in the instant docket. The Department's extensive review covered the Company's new contract with Northern Natural Gas (NNG), its proposed entitlement level for the 2018-2019 heating season, its Design Day analysis, and reserve margin. In addition, the Department reviewed CenterPoint's system planning process, and the PGA cost recovery proposal. The Company addresses each issue below.

**NNG Contract**

The Department reviewed CenterPoint Energy's new contract, reasons for entering a new contract now, and the bypass analysis prepared to aid in contract negotiations, and concludes that the renegotiated NNG contract "is generally favorable to ratepayers and represents the most advantageous result for ratepayers."<sup>1</sup> CenterPoint Energy agrees with the assessment, and appreciates the Department's thorough review of its contracting process. Going forward, as new capacity becomes available under the NNG Contract beginning in November 2019, the Company may release capacity to facilitate customer switching from interruptible dual fuel services to firm transport services and it will report on any capacity release transaction and resulting revenues in future Annual Automatic Adjustment ("AAA") filings.

**Design Day Analysis**

The Department noted that the Company relied on two models to estimate its design day load: a traditional firm service model based on use-per-customer over all winter data, and a second model to account for the recent, and expected, migration of non-firm, dual fuel customers to firm service. The DOC concluded that the two-regression approach is reasonable at this time, and recommends the Commission accept the design-day level proposed by the Company in this proceeding.<sup>2</sup>

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<sup>1</sup> G008/M-18-462: Comments of the Department of Commerce, December 31, 2018, Page 7 -TRADE SECRET version.

<sup>2</sup> G008/M-18-462: Comments of the Department of Commerce, December 31, 2018, Pages 9, 13-14 -TRADE SECRET version.

The Department also recommends that CenterPoint conduct additional analysis regarding its design-day calculation in future demand entitlement filings. In particular, the Department would like to see, in future demand petitions, analysis that explores additional factors, such as day-of-the-week and month, that likely might impact peak day use. CPE believes its current model meets the operational needs of the Company and supports the use of the model as provided in this petition. Like the Department, however, the Company's goal is to produce a robust estimate as a risk assessment tool and the Company is willing to work with the Department during its next design day calculation and planning cycle to investigate potential improvements to the design-day analysis.

### **Reserve Margin**

The Department expressed concern about CenterPoint Energy's reserve margin for the 2018-2019 Heating season and requested the Company justify in Reply Comments the decision to not procure additional capacity for this heating season and what, if any, other measures CenterPoint has available to ensure firm reliability on a peak day if peak shaving is not available.

In general, the utility industry has adopted conservative approaches to maintain system reliability and generally agrees that some amount of additional capacity over that required for a design day is prudent for the following reasons: (1) design-day estimates are based on data for weather that hasn't been experienced in recent history, (2) the utility must be able to offset the impact of possible equipment failures or interruptible customers' inability to curtail, and (3) there are not reasonable options for obtaining additional pipeline capacity or delivered gas supplies on a design day. Conservative estimates are considered prudent in CPE's cold-weather climate, because the risk of critical-winter system failure would be far-reaching and potentially catastrophic as firm customers, especially residential customers, have no effective alternative for meeting their heating needs. Loss of heat by residential customers can lead to frozen and burst pipes, use of inappropriate means to try to heat the home resulting in potential carbon monoxide poisoning, and danger to the young, elderly, or infirm who cannot tolerate cold. Consequently, CPE tends to be conservative in determining the level of required entitlements.<sup>3</sup>

As part of CPE's gas supply plan, the Company did not contract for additional entitlement this season. The Company's original plan had been that the NNG additions for the 2017-18 heating season would be sufficient to also cover expected growth for the 2018-2019 Season. Adding entitlement in "off" years is usually done either by capacity release, or by more expensive means based on the terms of NNGs tariffs and our contract.

Though the Company explored its options for adding entitlement for the present season, particularly considering the additional firm load due to additional firm service requests, there were few cost-effective alternatives for short-term relief. The Company prepared to purchase spot market delivered supplies to make up for the peak day capacity deficiency in the event such additional capacity is needed due to peak day conditions, and monitors the secondary capacity release market for available resources. Given our already committed-to longer-term contracting with NNG for heating seasons beyond this one, additions made last year from the available secondary capacity release market, and our diverse portfolio of supply and peaking, the Company expects its entitlement contracts to be sufficient for the current heating

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<sup>3</sup> As the Department aptly points out, Design Day estimates are statistical models used to estimate a rare occurrence. As discussed below, the Company, and Concentric, suggested using the upper bound of the design-day estimate because it suggests that the Company's design day is likely only to exceed its firm sales model estimate 2.5 percent of the time if the weather gets to 90 HDD (or -25 Degrees Fahrenheit) for an average 24-hour period.

season. CenterPoint Energy's ultimately determined that under the circumstances, including a very conservative estimate and managing the reserve margin risk through its day-to-day operations would be the most reasonable course of action for customers.

#### Peak Shaving Clarification

CenterPoint Energy would like to clarify the quantification of Peak Shaving capacity in its available supply calculations. The Department suggests CenterPoint Energy includes only 33 percent of peak shaving capacity in its design day analysis<sup>4</sup>, which the Company believes may be a misunderstanding of information filed in its 2010-2011 Demand Entitlement request.

CenterPoint Energy first used its current design day methodology in Docket G008/M-11-1078.<sup>5</sup> After consultation with Concentric Energy Advisors, a better method to estimate Design Day was proposed that provided more daily sales data to be used in statistical modelling. Concentric recommended that a complete design day plan should recognize that sometimes peaking resources may not be available in extreme weather, and it would be reasonable to identify the single largest peaking facility, which is the LNG plant, and make an allowance for some level of physical plant failure. At that time, the Company reflected total peaking facilities of 323,700 Dekatherms/day (Liquified Natural Gas of 72,000 Dt/day, Underground storage of 50,000 Dt/day, and combined propane resources of 201,700 Dt/day), of which it identified 36,000 of LNG as Physical Reserve.

The physical reserve is calculated to account for physical failure of a peak shaving facility. As stated in Docket G008/M-11-1078 CenterPoint Energy has based the physical reserve quantity used in the supply plan on a 50 percent failure of its largest Peak Shaving facility, Dakota Station LNG (full daily rated capacity of 72,000 DT/day). This would represent a reduction of about 11-12 percent of the total peaking facilities (36,000 divided by 323,700), not a reduction of 66% as the DOC comments suggests.

While the Department quotes 33 percent from the Company's petition, the 33 percent noted in the 2011-2012 plan filing referred to CenterPoint Energy's calculation to modify the daily peak output for a single propane air facility, Anoka, because this facility had limited storage capability compared to the rated output of the peak shaving station.<sup>6</sup> The Anoka propane plant has daily production capacity of 19,200 DT/day, but used at full output rate would exhaust the storage in 1 1/3 days. For planning purposes, the Company relies on each propane plant's capacity to last for at least a three-day weather event. For all other peak shaving facilities, CenterPoint Energy uses the rated energy output (daily capacity) for each of the facilities because they all have three or more days of energy storage capacity available on their sites.

The Company's current plan shows 280,000 Dt/day of peak shaving availability in total<sup>7</sup>, and accounts for the Anoka plant's daily output adjustment. Therefore, CenterPoint Energy's current plan would account for the possibility of about a 12-13 percent peaking failure, as opposed to the 66 percent reduction included in the Department's calculations. CenterPoint Energy emphasizes that it plans and fully expects that its peak shaving portfolio is diverse and reliable, offering extensive peak day resource availability.

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<sup>4</sup> G008/M-18-462: Comments of the Department of Commerce, December 31, 2018, Pages 12 (footnote 30), 15 - TRADE SECRET version.

<sup>5</sup> G008/M-07-561 and G008/M-11-1078 Comments of CenterPoint Energy dated April 30, 2012 – pg 9

<sup>6</sup> G008/M-07-561 and G008/M-11-1078 Comments of CenterPoint Energy dated April 30, 2012 – pg 8

<sup>7</sup> G008/M-18-462, Initial Petition, July 2, 2018, page 6. 36,000 Dt/Day Physical reserve divided by 280,000 Dt/day = 12.8%

### **Planning and Integration**

The Department noted that the Company explained its approach to analyzing its system and conducting its planning at the more granular Town Border Station (“TBS”) level and the Department recommended that CenterPoint Energy “elaborate, in detail, in its *Reply Comments* how the Company conducts planning at the TBS level as well as what steps it takes to maintain reliability at the TBS level and to correct instances where consumption exceeds the MDQ.”

#### **Utility Planning for Pipeline Entitlement**

CenterPoint Energy reviews and updates its pipeline entitlement needs annually, on two levels. System-wide planning forecasts the level of gas supplies needed to meet total system needs on a design day at various times in the future and at individual town border stations where isolated operational needs have been identified based on the previous winter’s activities. Identified needs may be met through contracted pipeline capacity, third-party supplies delivered directly to CPE’s system, or Company-owned storage or peaking facilities. If entitlements are available in the marketplace, either from a pipeline or in the capacity release market, they can be purchased immediately; however, this has rarely been the case with NNG, which has essentially been sold out in recent years.

#### **Capacity Planning – Town Border Station (TBS) Level**

In addition to design-day regression analysis using system-wide daily sales data, as a prudent measure, the Company reviews sales data at specific town border stations and compares results to delivery capabilities at those points (pipeline entitlements and on-system peaking equipment) to verify gas supply requirements can be met, especially under peak-weather conditions. This data highlights areas of concern that may not be evident in the overall regression analysis. The Company has been developing more sophisticated tools to perform this review. The system uses an integrated software that allows multiple sources of data to be combined to allow mapping and multi-level combinations of the historical data to see areas of concern. Information from this review may indicate a need for capacity changes at isolated points in CPE’s system, even though on a system-wide review no additional capacity may be required. The additional capacity requirement could be caused by the addition of significant load, pipeline constraints or other circumstances. (Conversely, information from this review may indicate a need to reduce capacity at certain points on the Company’s system.) This review is performed after the completion of each winter season, often in consultation with NNG, usually during the second quarter of the year. CPE projects gas supply requirements by station for several years into the future and uses those projections to identify when additional demand units may be needed. Unlike the system-wide needs identified through the design-day projection, these isolated needs are usually included with larger system expansion projects planned to meet identified system-wide needs, as were those planned for the 2019 NNG Construction season.

Using the methodologies outlined above, CenterPoint believes it has sufficient capacity on a system-wide basis, and on a specific-TBS basis, to reliably serve firm load for the duration of the current heating system. Based on its review of CenterPoint’s distribution planning and the nature of the Company’s natural gas distribution system, the Department concludes that the current planning approach, which is unique to each utility, is reasonable at this time and not a detriment to ratepayers or reliability. The Company agrees with the Department’s conclusion that Company-specific planning is adequate and appropriate. As in this docket, the Department thoroughly reviews the Company’s design-day and planning methodologies and the Company is willing to collaborate with the Department on potential improvements to these methodologies going forward to ensure system reliability and minimize ratepayer detriment.

### **Conclusion**

In conclusion, the Company provides the information requested by the Department, and agrees with the Department's recommendations for the Commission to require future NNG market payments to be credited to ratepayers via the PGA and to accept the Company's proposed demand charges effective November 1, 2018. The Company thanks the Department for its review and looks forward to the Department's additional comments.

**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 Reply comments regarding the 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, 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 Services  
CenterPoint Energy

Subscribed and sworn to before me  
this 14<sup>th</sup> day of January, 2019

/s/ Mary Jo Schuh  
Notary Public  
Term expires: 01/31/2020

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