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July 12, 2006

Mr. Larry Hartman
Minnesota Department of Commerce
Energy Facility Permitting
85 7th Place East
Suite 500
St. Paul, MN 55101-2198

Subject: CenterPoint Energy – Riverside Pipeline Project
PUC Docket No. G008/GP-06-426
Route Corridor Width Request

Dear Mr. Hartman:

CenterPoint Energy submitted an application to the Minnesota Public Utilities Commission for a Natural Gas Pipeline Routing Permit and Partial Exemption from Pipeline Route Selection Procedures in accordance with Minnesota Rules Chapter 4415 on April 6, 2006. The application identified an approximately 16.3-mile pipeline route from an interstate natural gas pipeline interconnect location in the City of Andover, to the Xcel Energy Riverside Power Plant in the City of Minneapolis. CenterPoint Energy respectfully requests the opportunity to identify varying corridor widths along the proposed pipeline route to accommodate possible minor route variations.

Minnesota Rules 4415.0010, subp. 32 has defined a “route” to include:

“...a variable width from the minimum required for the pipeline right-of-way up to 1.25 miles”.

In past pipeline routing permits issued by the Environmental Quality Board (EQB) and most recently the Public Utilities Commission (PUC), the EQB and PUC has more specifically limited the width of the route when an existing right-of-way is being utilized.

The majority of the proposed CenterPoint Energy Riverside Pipeline route is located adjacent to existing rights-of-way, and therefore a route corridor width of 1.25 miles will not be necessary. Project maps depicting the preferred route were submitted with the Application for Routing Permit and Partial Exemption from Route Selection Procedures. CenterPoint Energy is anticipating the possibility of minor route variations based on future information such as: results of engineering, environmental or cultural survey data; discussions with landowners; permit requirements; future development projects; future municipal projects; potential road or highway modifications; or other construction related factors. In order to allow for minor route variations, CenterPoint Energy is requesting varying route corridor widths along the proposed route. The purpose of this request for varying route corridor widths is to limit the route to a reasonable width, but also provide flexibility to allow for minor route variations due to the issues mentioned above.

CenterPoint Energy is requesting a minimum route corridor width of 500 feet centered on the proposed pipeline route and has identified several areas where additional width may be needed due to site specific conditions. The table below is a list of the areas where CenterPoint Energy is requesting additional width, along with the reasons for the requests. Maps depicting the requested corridor widths are attached.

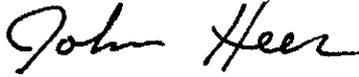
| Map Location Label | Location | Requested Route Corridor Width | Explanation |
|--------------------|---|--|--|
| Area A | North end of route – City of Andover | Approximately 2500 foot by 3800 foot area defined as follows: 200 ft east of Prairie Road; 250 ft north of 148 th Lane NW; 250 ft west of the proposed pipeline route; and 100 ft south of Andover Blvd. NW | Provide CenterPoint Energy with the flexibility to modify the route from the interconnect with Northern Natural to the railroad corridor. |
| Area B | Bunker Hills Regional Park – From Bunker Lake Blvd to 600 ft north of Main Street | 500 ft on either side of the proposed pipeline route. | Allow for route variations within the county park in the event that protected plants or other construction constraints are identified within the proposed pipeline right-of-way. |
| Area C | From 600 ft north of Main Street to 121 st Street | 600 ft to the west of the proposed pipeline route and 250 ft to the east of the proposed pipeline route. | Allow for route adjustments along an Xcel Energy electric transmission line. |
| Area D | State Highway 10 Crossing – 800 ft north of Highway 10 to Egret Street. | 500 ft to the west of the proposed pipeline route and 250 ft east of the proposed pipeline route. | Allow for adjustments to the State Highway 10 crossing, and the crossings of the meandering Coon Creek. |
| Area E | I-694 Crossing – From 61 st Ave. NE to 600 ft south of I-694. | 500 ft to the west of the proposed pipeline route and 1500 ft to the east of the proposed pipeline route. | Allow for adjustments to the I-694 crossing based on engineering and survey data, as well as requirements of Mn/DOT. |
| Area F | East River Road - From 600 ft south of I-694 to the south endpoint of the pipeline route. | 250 ft to the west of the proposed pipeline route and 350 ft to the east of the proposed pipeline route. | Allow for the possibility of locating the pipeline on the east side of East River Road. |

If there are any questions regarding this request, please contact Mr. John Heer, CenterPoint Energy Project Manager, at 612-321-4345 or Mr. David Hennen, ProSource Technologies, Inc., at 763-786-1445.

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We look forward to continuing to work with the Department of Commerce and Public Utilities Commission on this project and appreciate the opportunity to submit this request for route corridor widths.

Sincerely,



John Heer
Riverside Pipeline Project Manager
CenterPoint Energy

cc: Jeff Haas, Minnesota Department of Commerce
David Hennen, ProSource Technologies, Inc.

Attachment: Route maps of requested corridor