

**STATE OF MINNESOTA  
PUBLIC UTILITIES COMMISSION**

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**In the Matter of CenterPoint Energy's  
Natural Gas Innovation Plan**

**Docket No. G008 /M-23-215**

**REPLY COMMENTS OF THE CLEAN ENERGY ORGANIZATIONS**

**March 15, 2024**

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## INTRODUCTION

The Clean Energy Organizations (“CEOs,” consisting of Fresh Energy, Minnesota Center for Environmental Advocacy, and Sierra Club) submit these Reply Comments in response to Initial Comments submitted on January 16, 2024 discussing the first Natural Gas Innovation Act (“NGIA”) plan filed by CenterPoint Energy (“the Company”).

These Reply Comments summarize our conditional support for two pilots (Pilots L and M) that we did not review in our initial comments, revise our recommendations for Pilot N, respond to comments on certain pilots raised by other parties, and provide an updated greenhouse gas (GHG) emission reduction target for the Company based on newly acquired historical sales data.

## ANALYSIS

### I. CEOs Support Pilot L (Industrial Electrification Incentives) and Pilot M (Commercial Hybrid Heating) with Modifications

The CEOs support the inclusion of Pilots L and M in the Company’s NGIA plan, with modification, because these pilots capitalize on the important opportunity for the Company to use NGIA pilots to bolster work on electrification, energy efficiency, and weatherization in Energy Conservation and Optimization (ECO) programs.

Regarding Pilot L, the Minnesota Department of Commerce (“Department”) states:

This pilot also appears to be a better fit for the Company’s ECO plan than the NGIA. As we noted earlier, the NGIA statute clearly states that investments that can be reasonably included in the natural gas utility’s Triennial Plan under section 216B.241 should not be included in the NGIA Innovation Plans. This pilot also needs additional work regarding customer outreach. Hence, the Department didn’t recommend approval of the pilot. The Department did suggest the Company pursue the project via the ECO funding mechanism.<sup>1</sup>

Similar to Pilot L, the Department states that Pilot M “would be a better fit for the Company’s ECO Plan due to the statutory threshold regarding the classification of projects between ECO and the NGIA.”<sup>2</sup>

The CEOs respectfully disagree that these pilots are not a good fit for NGIA and reiterate our reasoning from our initial comments:

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<sup>1</sup> *In the Matter of CenterPoint Energy's Natural Gas Innovation Plan*, Minn. Pub. Util. Comm’n Docket No. G-008/M-23-215, Public Comments of the Minn. Dep’t of Com., Div. of Energy Res. at 5 (Jan. 16, 2024) [hereinafter Department Initial Comments].

<sup>2</sup> *Id.*

ECO, previously the Conservation Improvement Program (CIP), is the bedrock program for these measures in Minnesota, but its goal is not necessarily to achieve market transformation. NGIA, on the other hand, is intended to complement ECO by unlocking efficiency and electrification investments that could not be reasonably included in a utility's ECO plan. In other words, the Company's NGIA proposal should work to achieve energy savings and GHG reductions that go beyond ECO, even if the measures or programs included in both have overlap. To that end, the Commission adopted recommendations proposed in joint comments led by the Department of Commerce related to the interplay between CIP/ECO and NGIA and, in particular, the phrase "investments" in NGIA. In the joint comments, which included Fresh Energy as a signatory, the joint commenters noted the importance of "facilitating development of a broad array of energy efficiency and strategic electrification investments under NGIA and preserving the integrity of both the CIP and NGIA frameworks." The joint comments went on to "conclude that relying on the term 'investments' used in the statutory definition of energy efficiency and strategic electrification creates flexibility regarding what type of efficiency and electrification programs, measures, or approaches might qualify in the future."<sup>3</sup>

Based on this reasoning, Pilots L and M are appropriate for inclusion in the Company's NGIA plan. These investments in strategic electrification have the potential to achieve energy savings and GHG reductions that go beyond ECO.

Additionally, utilities' ECO triennial plans for 2024-2026 have recently been finalized and the Company recently filed its updated plans based on the Deputy Commissioner's Decision.<sup>4</sup> It is therefore an inconvenient time for the Company to add these pilots to its 2024-2026 ECO Triennial plans.

The CEOs recommend that the Commission require that the Company modify Pilots L and M to ensure that they are not limited to hybrid heating systems, as this is not a statutory requirement.<sup>5</sup> The Company should further modify these pilots to prioritize

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<sup>3</sup> *In the Matter of CenterPoint Energy's Natural Gas Innovation Plan*, Minn. Pub. Util. Comm'n Docket No. G-008/M-23-215, Initial Comments of the Clean Energy Organizations at 14-15 (Jan. 16, 2024) (footnotes omitted) [hereinafter CEOs Initial Comments].

<sup>4</sup> *CenterPoint Energy's 2024-2026 Natural Gas Energy Conservation and Optimization Triennial Plan*, Minn. Pub. Util. Docket No. G-008/CIP-23-95, Compliance Filing (Jan. 26, 2024).

<sup>5</sup> Minn. Stat. § 216B.2427, subd. 1(q) states that "*Strategic electrification* means the installation of electric end-use equipment in an existing building in which natural gas is a primary or back-up fuel source, or in a newly constructed building in which a customer receives natural gas service for one or more end-uses...."

investments in electric heating equipment rather than the installation of new gas backup equipment in hybrid heating systems.

The CEOs also support the Geothermal Exchange Organization's suggestion that the Company study geothermal heat pumps as they implement Pilots L and M.<sup>6</sup> This aligns with our recommendation in our initial comments that the Company include GSHPs in its NGIA pilots.<sup>7</sup>

Lastly, if the modified Pilots L and M include gas backup, we encourage the Company to collect data on how often the gas backup in the hybrid heat pump systems is needed. This will be useful information to evaluate the potential for all-electric heat pump systems to serve commercial and industrial customers.

## **II. CEOs Revise Our Recommendations for Residential Deep Energy Retrofits and Electric Air Source Heat Pumps (Pilot N)**

In our initial comments we supported approval of Pilot N with modifications to examine the impact of different retrofit levels on gas backup demand in different types of homes included in the project, and to pursue the goal that up to 100% of residences participating in phase 2 field testing are low-income residences.<sup>8</sup>

We would like to further recommend that Pilot N not be limited to hybrid heating systems and that it prioritizes investments in electric heating equipment rather than the installation of new gas backup equipment in hybrid heating systems.

## **III. Responses to Comments on Certain Pilots Raised by Other Parties**

### **A. RNG RFP Purchase (Pilot C) - Wastewater Recovery and Landfill Gas Should Not Be Prematurely Eliminated as Feedstock Options**

The Department recommended the removal of the budgets associated with the wastewater recovery and landfill gas archetypes from the RNG RFP in Pilot C because the Company did not identify any potential customers for either of these RNG archetypes.<sup>9</sup> The CEOs are concerned about adding these restrictions to Pilot C given that research has identified wastewater and landfill gas as more favorable feedstock options

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<sup>6</sup> *In the Matter of CenterPoint Energy's Natural Gas Innovation Plan*, Minn. Pub. Util. Comm'n Docket No. G-008/M-23-215, Geothermal Exchange Organization's Comments at 2 (Jan. 15, 2024).

<sup>7</sup> CEOs Initial Comments at 15, 48.

<sup>8</sup> CEOs Initial Comments at 42.

<sup>9</sup> Department Initial Comments at 3, 90.

for RNG.<sup>10</sup> Rather than eliminate these archetypes at this early stage, we recommend that the Company work to identify developers for these archetypes under Pilot C.

### **B. Green Hydrogen Blending into Natural Gas Distribution System (Pilot D) Lacks Evidence Regarding Its Viability**

In our Initial Comments we recommended that the Company pursue an alternative to Pilot D that consists of a hydrogen facility dedicated only to hard-to-electrify customers. Our reasons for this recommendation were that the Company has not demonstrated the scalability of hydrogen blending, that the pilot is expensive relative to its GHG-reduction benefits, and that the pilot will not deliver health and economic benefits to customers.<sup>11</sup>

The CEOs find that the Citizens Utility Board and the Department present additional compelling arguments against the approval of Pilot D, citing concerns regarding its necessity and cost-effectiveness. The Company's existing green hydrogen plant in Minneapolis has underperformed, producing only 10 percent of its projected output over the past year.<sup>12</sup> This underperformance underscores the need for thorough evaluation to determine the root causes, whether related to design flaws or operational issues. Given the doubts raised by the underperformance of the existing facility, there is a clear hesitation towards approving Pilot D without further clarification and assurance of its viability.

### **C. Urban Tree Carbon Offsets (Pilot G) - Offsets Are Inconsistent with the Intent of the NGIA and Should Not Be Approved**

In our Initial Comments on the Company's NGIA plan we recommended that the Commission remove Pilot G from the Company's plan, arguing that offsets of any type fail to satisfy the NGIA throughput goal<sup>13</sup> and definition of carbon capture.<sup>14</sup> The Department also argued that Pilot G as proposed is inconsistent with the statutory intent of the NGIA because it proposes to purchase carbon credits from trees planted between 2019 and 2021 and therefore will not generate incremental carbon reductions. The

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<sup>10</sup> Merrian Borgeson, *A Pipe Dream or Climate Solution? The Opportunities and Limits of Biogas and Synthetic Gas to Replace Fossil Gas* (NRDC, 2020), <https://www.nrdc.org/sites/default/files/pipe-dream-climate-solution-bio-synthetic-gas-ib.pdf>.

<sup>11</sup> CEOs Initial Comments at 25-29.

<sup>12</sup> See Attachment 1: CenterPoint Energy Minn. Gas Response to Information Request 052 from the Minn. Dep't of Com. in Docket No. G-008/M-215 - NGIA.

<sup>13</sup> Minn. Stat. § 216B.2427, subd. 10 (stating that it is the goal of the State that utilities reduce throughput through the NGIA).

<sup>14</sup> Minn. Stat. § 216B.2427, subd. 1(c) (defining carbon capture as the capture of GHGs that "would otherwise be released").

Department stated it could potentially support Pilot G if it involved planting new trees in the future.<sup>15</sup>

While we agree that only newly planted trees can deliver incremental carbon reductions in any context, modifying Pilot G to require that new trees are planted in the future does nothing to resolve the inconsistency between using offsets and the NGIA throughput goal, nor does it change the fact that offsets do not meet the definition of carbon capture in the NGIA legislation. For these reasons we maintain our original recommendation that offset projects of any type should have no role in initial NGIA plans, and that Pilot G should be removed from the Company's plan.

#### **D. New Networked Geothermal Systems (Pilot I) - The Company Should Be Allowed to Submit a More Detailed Proposal for the Implementation Portion of This Project After the Feasibility Study Is Completed**

In our Initial Comments on the Company's NGIA plan we supported Pilot I with modifications to: (1) prioritize installation in low income and environmental justice areas within the Company's service territory, with special attention to segments due for pipe replacements or upgrades, and (2) provide more information on how the Company will provide stakeholders with ample opportunities to weigh in on the project.<sup>16</sup>

Pilot I received broad support from other parties, with many citing significant potential benefits, including energy efficiency improvements, positive health impacts, load management benefits, and labor and economic development opportunities associated with the technology. No parties explicitly opposed the entire project, but the Department and the Residential Utilities Division of the Office of the Attorney General (OAG) raised concerns regarding the lack of detail provided about the target community, technology to be used, and costs for the implementation portion of the project.<sup>17</sup> Due to these concerns, both the Department and the OAG recommended the Commission only approve the funds needed to complete the feasibility study at this time, with the OAG further recommending the Commission reassess the broader project plan once the Company has a clear understanding of the costs.<sup>18</sup>

We are not opposed to the OAG's recommendation to have the Commission reassess approval for the implementation portion of the project after the Company provides more details. We suggest that the Company be given an opportunity to present these details and seek approval for additional funding in an annual status report. This arrangement would provide the Company with more certainty regarding the likelihood

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<sup>15</sup> Department Initial Comments at 5.

<sup>16</sup> CEOs Initial Comments at 37-38.

<sup>17</sup> Department Initial Comments at 50-51; *In the Matter of CenterPoint Energy's Natural Gas Innovation Plan*, Minn. Pub. Util. Comm'n Docket No. G-008/M-23-215, Initial Comments of the Office of Attorney General at 8-9 (Jan. 12, 2024) [hereinafter OAG Initial Comments].

<sup>18</sup> Department Initial Comments at 50-52; OAG Initial Comments at 9.

of the implementation phase moving forward and would keep the door open for customers to benefit from this promising technology for years to come. This approach also aligns with the Company's intent to file the feasibility study results, which will provide the additional information requested by the Department and OAG, in an annual status report before proceeding to project construction.<sup>19</sup>

The Department provided additional recommendations regarding the scope of the feasibility study for Pilot I, arguing that it should include, among other things, an assessment of the environmental impacts and exploration of alternative energy solutions.<sup>20</sup> While we support and frequently advocate for conducting environmental review and alternatives analyses for energy projects, we disagree that these analyses should be required for an initial feasibility study such as that proposed for Pilot I. These analyses should be conducted after technical and economic feasibility has been confirmed in a study such as what the Company is proposing in Pilot I, and the Company is considering significant scaled investments in the technology or resource.

Finally, both Minneapolis and the Department recommended limiting Pilot I to new construction.<sup>21</sup> We recommend the Commission not prematurely limit the feasibility study to new construction because this restriction would eliminate a variety of potentially valuable projects from future consideration, including installation of geothermal networks in areas where future gas replacements are planned.

#### **E. Decarbonizing Existing District Energy Systems and New District Energy System (Pilot J and K) Should Be Approved but Should Not Count Toward the District Energy Budget Cap**

The CEOs continue to generally support the deployment of electrification and energy efficiency in Pilots J and K, with the caveat that the pilots should not count towards the statutory 20 percent district energy floor unless the resulting system meets the statutory definition of district energy.

In its comments, the Department recommends that Pilot J be rejected by the Commission:

Based on the information provided by CPE in their filing, it is not clear if any of these candidates would meet the definition of district energy. It is also not clear if there is adequate amount of energy efficiency or electrification measures included in the pilot such that it can qualify under

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<sup>19</sup> *Petition by CenterPoint Energy for Approval of its First Natural Gas Innovation Plan*, Minn. Pub. Util. Comm'n Docket No. G-008/M-23-215 at 29 (June 28, 2023) [hereinafter CenterPoint Initial Petition].

<sup>20</sup> Department Initial Comments at 52.

<sup>21</sup> *In the Matter of CenterPoint Energy's Natural Gas Innovation Plan*, Minn. Pub. Util. Comm'n Docket No. G-008/M-23-215, City of Minneapolis Initial Comments at 6 (Jan. 16, 2024) [hereinafter Minneapolis Initial Comments]; Department Initial Comments at 4.



one of those innovative resources. Lastly, if the Company believes this pilot can be reclassified as energy efficiency or strategic electrification, CPE has not demonstrated why such a pilot cannot be implemented in their ECO Triennial Plan. Based on the Department's analysis and review, the Department concludes that Pilot J is not eligible for inclusion in the Innovation Plan and should be rejected by the Commission.<sup>22</sup>

The Department similarly recommended that Pilot K be rejected by the Commission, applying the same logic.<sup>23</sup> The CEOs believe this is an unnecessary limitation on utilities' ability to pursue electrification and energy efficiency projects in NGIA. As described in our initial comments and earlier in these comments, NGIA is an important opportunity for the Company to deploy pilots that can bolster work on electrification, energy efficiency, and weatherization in ECO.

**F. Small/Medium Business GHG Audit (Pilot O) - CEOs Agree with Minneapolis' Comments on This Pilot (Weatherization and Energy Efficiency Should Be Prioritized Over Incentives for Carbon Capture Technologies)**

In its comments on the Company's proposed NGIA plan, the City of Minneapolis states:

Minneapolis favors small to medium business having GHG audits and could support this pilot for hard to decarbonize applications. However, the proposal to incentivize the carbon capture technologies being tested under another pilot may not be the best approach. Pursuing deep energy retrofits for businesses could lead to more GHG emissions benefit and increased customer bill savings. The pilot should aim to supplement ECO program funds to make it easier for customers to go beyond the 'lowest-hanging fruit' and invest in insulation and high efficiency appliances rather than carbon capture.<sup>24</sup>

The CEOs agree with the City of Minneapolis' comments that weatherization and energy efficiency should be prioritized over incentives for carbon capture technologies in Pilot O.

**G. Gas Heat Pumps for Commercial Buildings (Pilot Q) - Gas Heat Pumps Should Not Be Funded By NGIA**

The CEOs continue to recommend that Pilots P and Q be rejected by the Commission for the reasons described in our initial comments. The Department also

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<sup>22</sup> Department Initial Comments at 52-53.

<sup>23</sup> *Id.* at 53.

<sup>24</sup> Minneapolis Initial Comments at 8.

recommended that the Commission not approve Pilot P (Gas Heat Pumps for Residential Buildings), citing that it is “concerned as to the potential for commercialization for this technology in the near term and the potential efficiency of gas heat pump technology relative to electric air source heat pump technology.”<sup>25</sup> The Department’s comments on Pilot Q acknowledged that “[g]as heat pumps for commercial buildings proposed in Pilot Q suffer the same challenges as gas heat pumps for residential buildings.”<sup>26</sup> Instead of rejecting Pilot Q, however, the Department recommended that the pilot be approved with modifications. Given these concerns about commercial gas heat pumps, we disagree that Pilot Q should be included in the Company’s NGIA plan.

In regards to Pilot Q, the Department states that “the Company does not have any other pilot in its Innovation Plan targeting the heating needs of this specific customer class.”<sup>27</sup> But Pilot M (Commercial Hybrid Heating) targets the heating needs of the commercial customer class by providing incentives for hybrid heating systems using electric heat pumps. Given that electric heat pumps are more cost-effective and scalable, have higher adoption rates, and are already included for the commercial customer class in Pilot M, the CEOs conclude that it is not reasonable to fund a separate pilot for gas heat pumps for commercial customers.

The City of Minneapolis states its concern that “[d]eploying gas heat pumps would actually transition electric cooling to gas.”<sup>28</sup> The CEOs share this concern. Providing incentives through NGIA that would encourage customers to transition electric end uses, like air conditioning, to gas runs counter to the spirit of the law.

#### **IV. Updated GHG Reduction Target for the Company**

In our initial comments on the Company’s NGIA plan we recommended that the Commission modify the Company’s plan to clearly articulate how the plan will help the Company meet its fair share of state GHG emission reductions. We provided two alternatives for estimating the Company’s fair share. One of these approaches relied on an indirect estimate of the Company’s 2005 baseline emissions as we had requested but not yet received actual 2005 sales data from the Company at the time we submitted our initial comments. We appreciate the Company’s willingness to provide the requested historical sales data and additional details on how it estimated its 2020 baseline emissions so that we could refine our estimates and recommendations. We present here our refined estimates of the Company’s fair share of state GHG emission reductions and revised recommendations for modifying the Company’s cost-effectiveness objectives.

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<sup>25</sup> Department Initial Comments at 4, 91.

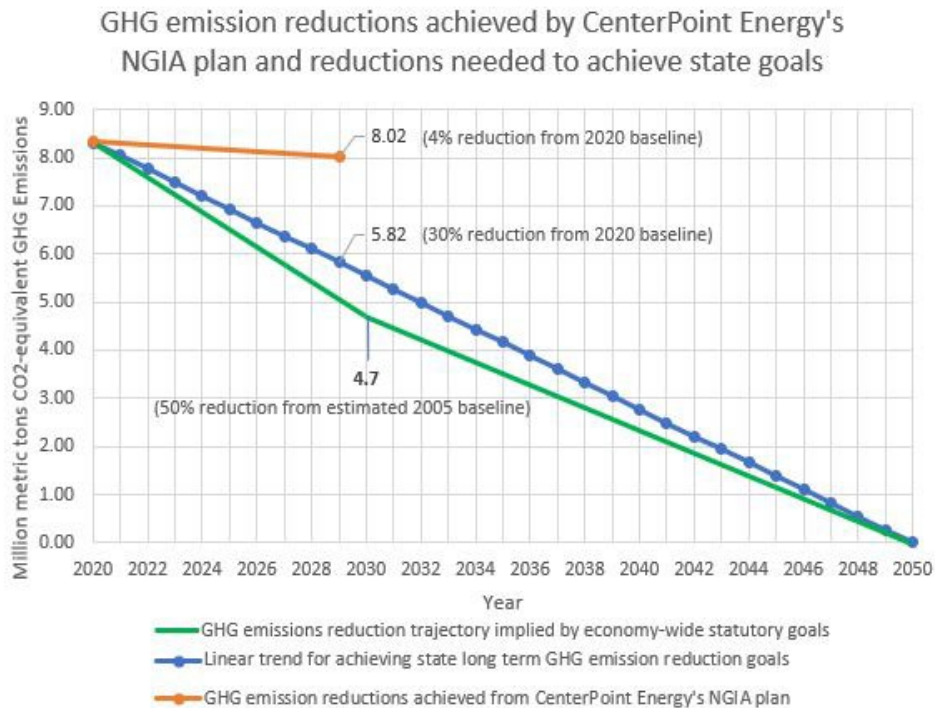
<sup>26</sup> *Id.* at 61.

<sup>27</sup> *Id.*

<sup>28</sup> Minneapolis Initial Comments at 8; *Absorption Heat Pumps*, U.S. Dep’t of Energy, <https://www.energy.gov/energysaver/absorption-heat-pumps> (last visited Mar. 13, 2024).

The figure below shows how the emission reductions the Company estimates it will achieve over the course of its five-year plan (orange line) compare to what its emissions would need to be if it: (1) strictly adhered to state short- and long-term emission reduction targets (green line), or (2) followed an alternative, more moderate emission-reduction trajectory based on linear average annual reductions between its 2020 baseline and the net-zero-by-2050 state goal (blue line). To align with the state target of a 50% reduction by 2030 relative to our revised estimate of the Company’s 2005 baseline,<sup>29</sup> the Company would need to aim for emissions levels in 2030 of roughly 4.7 million metric tons. The moderate trajectory would require the Company to achieve emission levels of no more than 5.8 million metric tons by 2029 (which is the presumed end of the five-year plan and represents a 30% reduction in the Company’s reported 2020 emissions), and levels of no more than 5.5 million metric tons by 2030 (a 33% reduction in the Company’s 2020 emissions).

We recommend that the Company replace the first and second objectives under Environment with a single objective that specifies the plan achieves or makes meaningful progress toward achieving Company-wide emission reductions of at least 30% by 2029, relative to the Company’s 2020 baseline. We continue to believe the Company should modify its proposal to include pilots that will allow it to cost-effectively achieve this objective.



<sup>29</sup> Our revised estimate of the Company’s 2005 baseline equates to 9.39 million metric tons of CO<sub>2</sub>-equivalent emissions. We derived this estimate by multiplying the actual 2005 sales data supplied by the Company by the same natural gas emission factor (0.066145) they derived from the 2022 GREET model and used to estimate their 2020 baseline emission estimate.

## CONCLUSION AND RECOMMENDATIONS

Considering the points raised above, the CEOs respectfully request that the Commission take the following actions in this NGIA plan. Unless otherwise noted, these recommendations are *in addition to* those raised in our Initial Comments.<sup>30</sup>

1. Rather than eliminate wastewater recovery and landfill gas feedstocks from Pilot C (Renewable Natural Gas Request for Proposal Purchase), encourage the Company to identify customers for these archetypes.
2. Allow the Company to present additional details on the project costs, location, and technology for Pilot I (New Networked Geothermal Systems) in an annual status report and permit it to seek approval for additional funding (within the NGIA budget caps) for the implementation portion of the pilot at that time.
3. Not restrict the feasibility study for Pilot I to new construction.
4. Modify the Company's NGIA plan to:
  - a. Ensure that Pilots L (Industrial Electrification Incentives) and M (Commercial Hybrid Heating):
    - i. Are not limited to hybrid heating systems;
    - ii. Prioritize investments in electric heating equipment rather than the installation of new gas backup in hybrid heating systems;
    - iii. Consider including geothermal heat pumps; and
    - iv. Collect data on how often gas backup is needed in any hybrid heat pump systems included.
  - b. Ensure Pilot N (Residential Deep Energy Retrofits and Electric Air Source Heat Pumps) is not limited to hybrid heating systems and prioritizes investments in electric heating equipment rather than the installation of new gas backup in hybrid heating systems.
  - c. Prioritize weatherization and energy efficiency over incentives for carbon capture technologies in Pilot O (Small/Medium Business GHG Audit).
  - d. Replace the first and second objectives under Environment with a single objective that specifies the plan achieves or makes meaningful progress toward achieving Company-wide emission reductions of at least 30% by 2029, relative to the Company's 2020 baseline. *This recommendation updates and replaces recommendation 1.b. In our initial comments.*

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<sup>30</sup> CEOs Initial Comments at 49-51.

Respectfully submitted,

/s/ Melissa Partin

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**State of Minnesota  
Minnesota Department of Commerce**

**Utility Information Request**

Docket Number: Dkt. G-008/M-23-215 - NGIA  
Requested From: CenterPoint Energy Minnesota Gas

Date of Request: 9/5/2023  
Response Due: 9/15/2023

Analyst Requesting Information: Adway De/Andy Bahn/John Kundert/Sachin Shah

Type of Inquiry: Other

***If you feel your responses are trade secret or privileged, please indicate this on your response.***

Request No.	
DOC 052	<p>Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.</p> <p>Reference(s): In the Matter of the Application of CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, (CPE, CenterPoint Energy, or Company), Natural Gas Innovation Act (NGIA) Filing</p> <p>The following questions are related to the Green Hydrogen Blending Pilot in Mankato where the Company forecasts it will produce 21,160 Dekatherms of Hydrogen annually.</p> <ul style="list-style-type: none"><li>a. Does CPE have experience operating electrolyzers of similar capacity to produce Hydrogen? If yes, please provide details of all such projects.</li><li>b. If the answer to part a above is yes, what are the main learnings the Company has acquired from those pilots?</li><li>c. Please provide monthly output (in Dth) from existing Hydrogen pilots since their inception.</li></ul> <p><b>Response:</b></p> <ul style="list-style-type: none"><li>a. Yes, CenterPoint Energy is operating a 1 MW green hydrogen blending facility in Minneapolis.</li><li>b. We have validated that our blending design and integration into our gas distribution system works very well. The electrolyzer and power supply combined design operates as expected with very fast response to</li></ul>

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Department: Regulatory Services  
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changes, which has helped us learn how to improve our hydrogen drying process design.

c. See Attachment 1 for monthly output in Dth of the Minneapolis facility.

**CenterPoint Energy Response to DOC 052**  
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Monthly Output of CenterPoint Energy's Minneapolis Hydrogen Facility	
H2 Produced (Dth)	Month of Production
199.5	22-Aug
296.5	22-Sep
74.8	22-Oct
11.9	22-Nov
8	22-Dec
0.3	23-Jan
0	23-Feb
28.6	23-Mar
54.5	23-Apr
155.3	23-May
433.4	23-Jun
198.7	23-Jul
566.4	23-Aug