505 Nicollet Mall
PO Box 59038
Minneapolis, MN 55459-0038

May 30, 2025

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 East Seventh Place, Suite 350
St. Paul, MN 55101-2147

Re: Natural Gas Innovation Act Annual Report for Calendar Year 2024
Docket No. G-008/M-23-215

Dear Mr. Seuffert:

CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or the "Company") respectfully submits its first Natural Gas Innovation Act ("NGIA") annual status report for activities during calendar year 2024. CenterPoint Energy's NGIA Plan ("Plan") was approved on October 9, 2024[1] and this report summarizes activities taking place between that approval and the end of the 2024 calendar year, including activities from before Plan approval.

The Company thanks the Commission for its consideration of this filing.

Sincerely,

/s/ Sherry Kemmetmueller
Manager, Regulatory Affairs

/s/ Betsy Lang
Lead Analyst, Regulatory

Attachments

C: Service List

[1] *In the Matter of CenterPoint Energy's Natural Gas Innovation Plan*, Docket No. G-008/M-23-215, Order Approving Natural Gas Innovation Plan with Modifications (Oct. 9, 2024) ("Plan Approval Order").

STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

Katie Sieben	Chair
Hwikwon Ham	Commissioner
Audrey Partridge	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

In the Matter of a Petition by CenterPoint Energy for Approval of Its First Natural Gas Innovation Plan	Docket No. G-008/M-23-215
	REPORT

Introduction

CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas, ("CenterPoint Energy" or the "Company") respectfully submits its first annual report ("Report") on implementation of its approved Natural Gas Innovation Plan ("Plan") to the Minnesota Public Utilities Commission ("Commission").This Report is filed in compliance with the Natural Gas Innovation Act ("NGIA")[2] and the Commission's Order approving CenterPoint Energy's Plan.[3]

This filing is organized into the following sections, with supporting Exhibits as summarized below:

- *Sections I – III:* Required miscellaneous filing information;
- *Section IV:* Summary of Accomplishments;
- *Section V*: Quantitative Results Summary;
- *Section VI:* Workforce Development and Diversity;
- *Section VII:* Inflation Reduction Act Updates;
- *Section VII:* Proposed Plan Modifications;
- *Section IX:* Pilot Performance Detail;
- *Section X*: Budget Flexibility Compliance Items;
- *Section XI:* Cost Recovery Summary and Innovation Act Adjustment Proposal; and
- *Section XII:* Progress Towards Achieving Cost Effectiveness Objectives.

The Company submits the following Exhibits:

Exhibit A: One Page Summary of Filing

[2] Minnesota Laws 2021, 1st Special Session, Chapter 4, Article 8, §§ 20, 21 and 27, partially codified at Minn. Stat. §§ 216B.2427-2428.

[3] *In the Matter of CenterPoint Energy's Natural Gas Innovation Plan*, Docket No. G-008/M-23-215, Order Approving Natural Gas Innovation Plan with Modifications (Oct. 9, 2024) ("Plan Approval Order").

Exhibit B: Compliance Matrix

Exhibit C: PGA and AAA Filings (placeholder)

Exhibit D: NGIA Tracker and Balance

Exhibit E: NGIA Tracker Projections

Exhibit F: Public Website Update(s) Since Last Report

Exhibit G: Cost/Budget Calculation Methodology – Structural Values

Exhibit H: GHG Reduction Calculation Methodology

Exhibit I: New Networked Geothermal Engagement Plan

Exhibit J: Proposed Revised Tariff Page

Exhibit K: Workforce Development Activities

I. Summary of Filing

A one-page summary of filing is attached as Exhibit A pursuant to Minn. R. 7829.1300, subp. 1.

II. Service on Other Parties

Pursuant to Minn. R. 7829.1300, subp. 2, the Company has served a copy of this filing on the Department of Commerce, Division of Energy Resources and the Office of the Attorney General – Residential Utilities Division. This filing has also been served on all parties on the enclosed service lists.

III. General Filing Information

Pursuant to Minn. R. 7829.1300, subp. 3, the Company provides the following information.

A. Name, Address, and Telephone Number of Utility

CenterPoint Energy Resources Corporation, doing business as CenterPoint Energy Minnesota Gas, a Delaware Corporation
505 Nicollet Mall
PO Box 59038
Minneapolis, Minnesota 55402
(612) 372-4664

B. Name, Address, Electronic Address, and Telephone Number of Utility Attorney

Jason Loos, Associate General Counsel – Regulatory Legal

505 Nicollet Mall
PO Box 59038
Minneapolis, Minnesota 55402
(612) 321-4410
Jason.Loos@centerpointenergy.com

C. Date of Filing and the Date the Proposed Rate or Service Change Will Take Effect

Date Filed: May 30, 2025
Effective Date: Upon Commission Approval

D. Statute Controlling Schedule for Processing the Filing

CenterPoint Energy is unaware of any statute that controls the timeframe for processing this filing.

Under Minn. R. 7829.0100, subp. 11, this petition is a "miscellaneous" filing because no determination of CenterPoint Energy's general revenue requirement is necessary. Comments on a miscellaneous filing are due within 30 days of filing, with replies due 10 days thereafter.[4]

E. Signature, Electronic Address, and Title of Utility Employee Responsible for Filing

/s/ Sherry Kemmetmueller
Sherry Kemmetmueller
Manager, Regulatory Affairs
(612) 321-5191
Sherry.Kemmetmueller@centerpointenergy.com

Betsy Lang
Lead Analyst, Regulatory and Legislative
(612) 321-4318
Betsy.Lang@centerpointenergy.com

F. Description of the Filing, Its Impact on Rates and Services, Its Impact on Any Affected Person, and the Reasons for the Filing

This filing is the Company's annual report on implementation of its approved Plan during calendar year 2024. Under the Plan, the Company is authorized to deploy innovative resources that reduce or avoid greenhouse gas ("GHG") emissions as part of approved pilots. In this filing, the Company describes its progress in implementing each approved pilot and requests to modify recovery of costs for Plan implementation to better match recovery to actual and projected expenses.

[4] *See* Minn. R. 7829.1400, subps. 1, 4.

IV. Summary of Accomplishments

CenterPoint Energy is pleased to share its first annual report on approved innovative pilots and research projects for powering Minnesota's economy and energy needs. CenterPoint Energy started implementation at the Order date of October 9, 2024 and is reporting on activities through the end of the 2024 calendar year. During the last couple months of 2024, CenterPoint Energy set the groundwork for success in 2025 and later years by negotiating contracts with implementation vendors, developing requests for proposals, negotiating with renewable natural gas ("RNG") suppliers, and onboarding new staff to support Plan implementation. While there were no participants or GHG savings in 2024, CenterPoint Energy completed important foundational work that will lead to participation and savings in future years. Though limited in data, this filing shares progress on the ramp up period for pilot projects and includes a look ahead at 2025 activities, highlighting opportunities for community collaboration, such as with a communications plan for networked geothermal pilot and a new semi-annual one-page document for public updates on implementation of the full Plan.

The Company carefully developed and modified its first Plan in consultation with interested parties, including working with interested parties to develop annual report requirements and finalizing Plan cost-effectiveness objectives following the Commission's approval Order. The Company intends this first report to serve, in part, as a template for future annual reports. As such, there are several zero values, tables, and exhibits that are intended as placeholders. The Company strives for continued dialog with parties and invites feedback throughout both the implementation and reporting processes, including the format of this report, during the upcoming comment period.

While the RNG purchase pilots and research & development feasibility study project do not yet have quantitative data to report, the Company is proud to contribute to the development of the regional RNG market via ongoing discussions with local producers and a local non-profit agricultural research organization. The Company has learned, and will continue to explore, the diverse concerns of RNG producers that are reflected in the Company's efforts to execute offtake agreements.

This Plan presents many exciting opportunities for learning how innovative technologies and program designs perform in Minnesota's economic, climatic, and cultural conditions. In other ongoing dockets, the Commission is exploring how utilities address system planning, energy burden, safety, reliability and cost, and other areas that impact customers. The Company sees the diverse projects and evaluation criteria in this plan as a comprehensive set of tools for helping determine what combination of resources will be needed, in which locations and at which scale to best meet Minnesota customers' energy demands. Since these demands include not only energy delivery but increasingly include community co-benefits and goals like greenhouse gas reduction, the learnings from CenterPoint Energy's Plan implementation should also inform interrelated dockets that touch on system planning.

V. Quantitative Results Summary

CenterPoint Energy provides the following tables in compliance with several Commission and statutory directives and in accordance with commitments made by the Company:

- CenterPoint Energy must provide pilot-specific data on greenhouse gas reductions;[5]
- CenterPoint Energy shall provide information on results and cost and budget impacts on the plan as a whole and individual pilots;[6] and
- CenterPoint Energy will track and report on residential, commercial/industrial, low-income, tribal, and urban vs. rural participation.[7]

The Company discusses updates to cost-benefit figures and its methodology for calculating GHG emissions reduction in Exhibits G and H respectively, including updates to structural cost-benefit metrics[8] and an assessment to which the degree to which the lifecycle GHG accounting methodology is consistent with current science.[9]

[5] Plan Approval Order, Order Point 36 Minn. Stat. § 216B.2727, subd. 2(f)(requiring reporting on lifecycle GHG reductions or avoidance achieved under the Plan).
[6] Plan Approval Order, Order Point 37; Minn. Stat. § 216B.2427, subd. 2(f)(requiring reporting on costs incurred under the Plan).
[7] *In the Matter of CenterPoint Energy's Natural Gas Innovation Plan*, Docket No. G-008/M-23-215, Petition by CenterPoint Energy for Approval of its First Natural Gas Innovation Plan (June 28, 2024) ("NGIA Petition"), page 31.
[8] Required by *In the Matter of Establishing Frameworks to Compare Lifecycle Greenhouse Gas Emission Intensities of Various Resources, and to Measure Cost Effectiveness of Individual Resources and of Overall Innovation Plans*, Docket No. G-999/CI-21-566, Order Establishing Frameworks for Implementing Minnesota's Natural Gas Innovation Act (June 1, 2022) ("Frameworks Order") Order Point 29.
[9] Required by Minn. Stat. § 216B.2427, subd. 2(f)(4).

Table 1: Summary of GHG Emissions Reductions

Pilot	Estimated Lifecycle GHG Reductions (Metric Tons CO2e) from 2024 Activities	Estimated Lifecycle GHG Reductions (Metric Tons CO2e) from Prior Plan Years	Total Cumulative GHG Reductions (Metric Tons CO2e) from Plan as of end of 2024	Estimated Lifecycle GHG Reductions (Metric Tons CO2e) in Approved Plan	Percentage Achieved GHG Reductions to Estimate
B - RNG Produced from Ramsey & Washington Counties Organic Waste	0	0	0	92,414	0% contracted 0% purchased
C - Renewable Natural Gas RFP Purchase	0	0	0	423,134	0% contracted 0% purchased
D - Green Hydrogen Blending into Natural Gas Distribution System	0	0	0	27,993	0%
E - Industrial or Large Commercial Hydrogen and Carbon Capture Incentives	0	0	0	107,196	0%
F - Industrial Methane and Refrigerant Leak Reduction	0	0	0	33,763	0%
G - Urban Tree Carbon Offsets	0	0	0	4,500	0%
H - Carbon Capture Rebates for Commercial Buildings	0	0	0	23,757	0%
I - New Networked Geothermal Systems	0	0	0	107,355	0%
J - Decarbonizing Existing District Energy Systems	0	0	0	124,030	0%
K - New District Energy System	0	0	0	40,882	0%

Table 1: Summary of GHG Emissions Reductions

Pilot	Estimated Lifecycle GHG Reductions (Metric Tons CO2e) from 2024 Activities	Estimated Lifecycle GHG Reductions (Metric Tons CO2e) from Prior Plan Years	Total Cumulative GHG Reductions (Metric Tons CO2e) from Plan as of end of 2024	Estimated Lifecycle GHG Reductions (Metric Tons CO2e) in Approved Plan	Percentage Achieved GHG Reductions to Estimate
L - Industrial Electrification Incentive	0	0	0	11,896	0%
M - Commercial Hybrid Heating	0	0	0	25,609	0%
N - Residential Deep Energy Retrofits and Electric Air Source Heat Pumps	0	0	0	66,760	0%
O - Small/Medium Business GHG Audit	0	0	0	4,380	0%
P - Residential Gas Heat Pumps	0	0	0	235	0%
Q - Gas Heat Pumps for Commercial Buildings	0	0	0	2,154	0%
R - Industrial and Large Commercial GHG Audit Pilot	0	0	0	35,560	0%
R&D Pilots	0	0	0	0	**N/A**
Total	**0**	**0**	**0**	**1,131,617**	**0%**

Table 2: Summary of Cost and Budget Impacts - Calendar Year 2024

Pilot	2024 Cost Counting Against NGIA Budget[1]	Prior Plan Year Costs Counting Against NGIA Budget	Total Costs Counting Against Budget in Plan	Approved 5-Year Budget	Percent Budget Spent
B - RNG Produced from Ramsey & Washington Counties Organic Waste	$191,163	$0	$191,163	$6,520,485	3%
C - Renewable Natural Gas RFP Purchase	$1,090,048	$0	$1,090,048	$40,271,426	3%
D - Green Hydrogen Blending into Natural Gas Distribution System	$120,855	$0	$120,855	$4,646,943	3%
E - Industrial or Large Commercial Hydrogen and Carbon Capture Incentives	$98,999	$0	$98,999	$3,793,912	3%
F - Industrial Methane and Refrigerant Leak Reduction	$37,349	$0	$37,349	$1,247,828	3%
G - Urban Tree Carbon Offsets	$10,230	$0	$10,230	$329,301	3%
H - Carbon Capture Rebates for Commercial Buildings	$17,483	$0	$17,483	$612,377	3%
I - New Networked Geothermal Systems	$342,693	$0	$342,693	$11,625,947	3%
J - Decarbonizing Existing District Energy Systems	$50,720	$0	$50,720	$598,794	8%
K - New District Energy System	$10,903	$0	$10,903	$215,644	5%
L - Industrial Electrification Incentive	$14,717	$0	$14,717	$504,436	3%
M - Commercial Hybrid Heating	$186,487	$0	$186,487	$7,068,602	3%
N - Residential Deep Energy Retrofits and Electric Air Source Heat Pumps	$361,454	$0	$361,454	$13,617,633	3%
O - Small/Medium Business GHG Audit	$68,715	$0	$68,715	$1,997,007	3%

Table 2: Summary of Cost and Budget Impacts - Calendar Year 2024

Pilot	2024 Cost Counting Against NGIA Budget[1]	Prior Plan Year Costs Counting Against NGIA Budget	Total Costs Counting Against Budget in Plan	Approved 5-Year Budget	Percent Budget Spent
P - Residential Gas Heat Pumps	$11,548	$0	$11,548	$380,761	3%
Q - Gas Heat Pumps for Commercial Buildings	$20,995	$0	$20,995	$749,464	3%
R - Industrial and Large Commercial GHG Audit Pilot	$36,751	$0	$36,751	$950,494	4%
Total (Pilots)	**$2,671,110**	**$0**	**$2,671,110**	**$95,131,054**	**3%**
R&D Pilots	$15,922	$0	$15,922	$10,570,462	0%
Total	**$2,687,032**	**$0**	**$2,687,032**	**$105,701,516**	**3%**

Table 3: Summary of Participation by Class - Calendar Year 2024

Pilot	Description of Participant	Total Participants	Residential Participants	Commercial & Industrial Participants
B - RNG Produced from Ramsey & Washington Counties Organic Waste	Dth	0	0	0
C - Renewable Natural Gas RFP Purchase	Dth	0	0	0
D - Green Hydrogen Blending into Natural Gas Distribution System	Hydrogen facilities starting operation	0	0	0
E - Industrial or Large Commercial Hydrogen and Carbon Capture Incentives	Customers	0	0	0
F - Industrial Methane and Refrigerant Leak Reduction	Customers Receiving Initial Survey	0	0	0
G - Urban Tree Carbon Offsets	Credits Purchased	0	0	0

Table 3: Summary of Participation by Class - Calendar Year 2024

Pilot	Description of Participant	Total Participants	Residential Participants	Commercial & Industrial Participants
H - Carbon Capture Rebates for Commercial Buildings	Units Installed	0	0	0
I - New Networked Geothermal Systems	Tons of Heating/Cooling Capacity Becoming Operational	0	0	0
J - Decarbonizing Existing District Energy Systems	Systems Implementing Projects	0	0	0
K - New District Energy System	Systems Implementing Projects	0	0	0
L - Industrial Electrification Incentive	Facilities	0	0	0
M - Commercial Hybrid Heating	Customers	0	0	0
N - Residential Deep Energy Retrofits and Electric Air Source Heat Pumps	Buildings	0	0	0
O - Small/Medium Business GHG Audit	Audits	0	0	0
P - Residential Gas Heat Pumps	Units Installed	0	0	0
Q - Gas Heat Pumps for Commercial Buildings	Units Installed	0	0	0
R - Industrial and Large Commercial GHG Audit Pilot	Audits Completed	0	0	0
Total		**0**	**0**	**0**

Table 4: Summary of Low-Income, Tribal, Urban, and Rural Participation - Calendar Year 2024

Pilot	Total Participation	Low-Income Participation	Tribal Participation	Urban Participation	Rural Participation
B - RNG Produced from Ramsey & Washington Counties Organic Waste	0	0	0	0	0
C - Renewable Natural Gas RFP Purchase	0	0	0	0	0
D - Green Hydrogen Blending into Natural Gas Distribution System	0	0	0	0	0
E - Industrial or Large Commercial Hydrogen and Carbon Capture Incentives	0	0	0	0	0
F - Industrial Methane and Refrigerant Leak Reduction	0	0	0	0	0
G - Urban Tree Carbon Offsets	0	0	0	0	0
H - Carbon Capture Rebates for Commercial Buildings	0	0	0	0	0
I - New Networked Geothermal Systems	0	0	0	0	0
J - Decarbonizing Existing District Energy Systems	0	0	0	0	0
K - New District Energy System	0	0	0	0	0
L - Industrial Electrification Incentive	0	0	0	0	0
M - Commercial Hybrid Heating	0	0	0	0	0
N - Residential Deep Energy Retrofits and Electric Air Source Heat Pumps	0	0	0	0	0

Table 4: Summary of Low-Income, Tribal, Urban, and Rural Participation - Calendar Year 2024

Pilot	Total Participation	Low-Income Participation	Tribal Participation	Urban Participation	Rural Participation
O - Small/Medium Business GHG Audit	0	0	0	0	0
P - Residential Gas Heat Pumps	0	0	0	0	0
Q - Gas Heat Pumps for Commercial Buildings	0	0	0	0	0
R - Industrial and Large Commercial GHG Audit Pilot	0	0	0	0	0
Total	**0**	**0**	**0**	**0**	**0**

Table 4a: Cumulative Plan Summary of Low-Income, Tribal, Urban, and Rural Participation

Pilot	Total Participation Through 2024	Low-Income Participation Through 2024	Tribal Participation Through 2024	Urban Participation Through 2024	Rural Participation Through 2024
B - RNG Produced from Ramsey & Washington Counties Organic Waste	0	0	0	0	0
C - Renewable Natural Gas RFP Purchase	0	0	0	0	0
D - Green Hydrogen Blending into Natural Gas Distribution System	0	0	0	0	0
E - Industrial or Large Commercial Hydrogen and Carbon Capture Incentives	0	0	0	0	0
F - Industrial Methane and Refrigerant Leak Reduction	0	0	0	0	0
G - Urban Tree Carbon Offsets	0	0	0	0	0

Table 4a: Cumulative Plan Summary of Low-Income, Tribal, Urban, and Rural Participation

Pilot	Total Participation Through 2024	Low-Income Participation Through 2024	Tribal Participation Through 2024	Urban Participation Through 2024	Rural Participation Through 2024
H - Carbon Capture Rebates for Commercial Buildings	0	0	0	0	0
I - New Networked Geothermal Systems	0	0	0	0	0
J - Decarbonizing Existing District Energy Systems	0	0	0	0	0
K - New District Energy System	0	0	0	0	0
L - Industrial Electrification Incentive	0	0	0	0	0
M - Commercial Hybrid Heating	0	0	0	0	0
N - Residential Deep Energy Retrofits and Electric Air Source Heat Pumps	0	0	0	0	0
O - Small/Medium Business GHG Audit	0	0	0	0	0
P - Residential Gas Heat Pumps	0	0	0	0	0
Q - Gas Heat Pumps for Commercial Buildings	0	0	0	0	0
R - Industrial and Large Commercial GHG Audit Pilot	0	0	0	0	0
Total	**0**	**0**	**0**	**0**	**0**

VI. Workforce Development and Diversity

The NGIA requires CenterPoint Energy to discuss the economic impact of the Plan, including job creation.[10] Consistent with one of CenterPoint Energy's approved cost-effectiveness

[10] Minn. Stat. § 216B.2427, subd. 2(f)(5).

objectives,[11] CenterPoint Energy will track activities supportive of workforce development implemented as part of this Plan. The Company has primarily focused on education related to NGIA generally rather than technologies in the Plan to date. A list of workforce development activities that CenterPoint Energy engaged in is included as Exhibit K.

CenterPoint Energy supports efforts to promote diversity in the energy and energy efficiency workforces. The Company recognizes the economic importance of diverse suppliers to the Company's business, to the economies of the states where CenterPoint Energy operates, and to the communities the Company serves. To increase awareness of the importance of diversity and transparency about the businesses that support CenterPoint Energy's Plan, the Company committed to providing the total and percent of Plan spending on vendor services for diverse vendors or suppliers in its annual reports.[12]

Table 5: Diverse Vendor Spend in 2024

Total 2024 Plan Spend	$2,687,032
Vendor Spend[13]	$25,922
Diverse Vendor Spend	$5,000
Diverse Vendor Spend as a Percent of Vendor Spend	19%

VII. Inflation Reduction Act Updates

In its Order approving CenterPoint Energy's Plan, the Commission ordered that the Company provide updates on IRA implementation.[14]

Pilot D: Green Hydrogen Blending into Natural Gas Distribution System

As proposed in the Company's initial NGIA filing, CenterPoint Energy has proposed Pilot D, Green Hydrogen Blending into Natural Gas Distribution System which could qualify for an Investment Tax Credit ("ITC") of 6% to 50% of qualified costs under the IRA. The amount of ITC that could be claimed for Pilot D is dependent on whether the project satisfies labor requirements and domestic manufacturing requirements. Alternatively, Pilot D could potentially be able to take advantage of Production Tax Credits ("PTC") in the range of $0.60 to $3.00/kg of hydrogen production. Ultimately the decision between an ITC and a PTC will require further analysis on the final design of the pilot.

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[11] "The Plan supports workforce development through trainings, tours, educational conferences, or similar supportive activities reaching 200 participants per year, or 1,000 participants over the five-year Plan period."

[12] NGIA Petition, Exhibit D.

[13] The Company included in "vendor expenses" all expenses made to business entities in return for services to deliver and evaluate NGIA pilots, including research and development pilots. Vendor spending includes, for example, payments to external project implementers.

[14] Plan Approval Order, Order Point 36.

Final Treasury guidance for the PTC became effective January 10, 2025.[15] The Final Guidance extends the annual matching temporal matching requirement, that the electricity generated in the same hour as the hydrogen facility uses electricity to produce hydrogen, from 2028 to 2030. Annual matching is allowed until then to meet the clean power time matching requirements. New clean power requirements, which apply to clean hydrogen produced via purchased electricity with up to 4 kilograms of carbon dioxide equivalents per kilogram of hydrogen production, require the electricity generation for the power-to-hydrogen facility to begin commercial operations within 36 months of the hydrogen facility being placed into service. CenterPoint Energy will explore whether it is feasible to enter into a power purchase agreement for a generator coming online within 3 years of the electrolyzer for the Green Hydrogen Blending pilot to complement the generation of renewable thermal credits when the solar array is powering the installation to satisfy the requirements of the PTC.

Pilot I: New Networked Geothermal System

In addition to Pilot D, Pilot I, New Networked Geothermal System, could qualify for the ITC. December 12, 2024 Treasury Guidance on Section 48[16] provided an interpretation of ownership of an Energy Property that implies separate ownership of components would be allowed to claim the credit, supporting the intended utility ownership model for the pilot, in which CenterPoint Energy would own the water loop and customers would own equipment in their home or business.

Pilots B and C: RNG Purchase Pilots

Several RNG projects being considered by CenterPoint Energy for supply for RNG would also be eligible for an ITC. CenterPoint Energy expects to be able to track these benefits with the information provided by contracted RNG producers.

Other Pilots

Finally, program participants in many of the Pilots, could be eligible for tax credits, rebates, or other federal incentives from the IRA.[17] However, these credits would be payable directly to the participant and it may not be possible for CenterPoint Energy to fully track benefits received. Of particular note, CenterPoint Energy continues to monitor the development of the IRA Home Efficiency Rebate programs which will be administered by the Department of Commerce in

[15] Federal Register :: Credit for Production of Clean Hydrogen and Energy Credit https://www.federalregister.gov/documents/2025/01/10/2024-31513/credit-for-production-of-clean-hydrogen-and-energy-credit

[16] Federal Register :: Definition of Energy Property and Rules Applicable to the Energy Credit https://www.federalregister.gov/documents/2024/12/12/2024-28190/definition-of-energy-property-and-rules-applicable-to-the-energy-credit

[17] NGIA Petition, Exhibit D provides some detail on what tax benefits, rebates, or other programs participating CenterPoint Energy customers may be eligible for in relation to each Pilot.

Minnesota. CenterPoint Energy will work to coordinate its residential- and multifamily-targeted NGIA offerings, such as Neighborhood Weatherization Blitzes.

VIII. Proposed Plan Modifications

The NGIA allows CenterPoint Energy to propose modifications to its Plan in annual reports.[18] In its Order approving CenterPoint Energy's Plan, the Commission required the Company to propose and seek approval for R&D pilots that were not previously filed and approved as part of the Plan.[19] In addition, The Commission required that CenterPoint Energy consult with the Minnesota Department of Agriculture regarding the possibility of incentivizing more Minnesota small family agricultural operations to participate in the development and sale of RNG. With its first status report, the Company is required to report on its discussions with the Minnesota Department of Agriculture and, depending on the results of these discussions, propose an R&D project that explores incentives to encourage Minnesota small family farms to participate in RNG markets.[20]

CenterPoint Energy met with the representatives of the Department of Agriculture in September 2024 for a broad discussion of RNG topics in Minnesota, including challenges and opportunities associated with small farm access to markets.

CenterPoint Energy will draw on learnings from other active RNG pilots and seek additional input from agricultural interested parties to better understand the issue of incentivizing small farm participation before defining the scope of the R&D project. The Company expects to propose the project before or as part of its next annual report. CenterPoint Energy will propose updates to its list of reporting requirements when proposing the new R&D project.[21]

IX. Pilot Performance Detail

In its Order approving CenterPoint Energy's Plan, the Commission ordered that the Company provide updates on the progress of the plan as a whole and each individual pilot, including R&D pilots.[22] The Company describes the progress of each pilot in the sections that follow. A one-page document, published on CenterPoint Energy's NGIA website,[23] will be updated at regular intervals to share high-level Plan progress with the public. The first version of this document is included with this filing as Exhibit F. In addition, the NGIA requires that the Company report on the processes used to track and verify the innovative resources and to retire the associated environmental attributes.[24] CenterPoint Energy addresses tracking, verification, and retirement for each pilot below.

[18] Minn. Stat. § 216B.2427, subd. 2(f)(7).
[19] Plan Approval Order, Order Point 25.
[20] Plan Approval Order, Order Point 39.
[21] Plan Approval Order, Order Point 37(a).
[22] Plan Approval Order, Order Point 37.
[23] https://www.centerpointenergy.com/NGIA
[24] Minn. Stat. § 216B.2427, subd. 2(f)(3).

1. Pilot B: RNG Produced from Ramsey & Washington Counties Organic Waste

Under this pilot, CenterPoint Energy will purchase RNG from an anaerobic digestion facility that will process source-separated food waste from Washington and Ramsey Counties' organics recycling program and a smaller quantity of yard waste.

In 2024, CenterPoint Energy purchased 0 Dth of RNG through Pilot B resulting in 0 lifecycle GHG reductions in metric tons CO_2e and 0 Dth geologic gas savings. Spending in Pilot B in 2024, and Plan development costs from before 2024 attributed to this pilot, are shown in the table below:

Table 6: Pilot B Cost Breakdown

Project Delivery	$24,098
Advertising & Promotion	$-
Allocation of General Portfolio Costs	$167,065
Revenue Requirement for Capital Investment	$-
Customer Incentives	$-
Total	$191,163
UCT Savings	$-
Total Incremental Cost Counting Against Budget	**$191,163**

In 2024, CenterPoint Energy worked towards negotiating a contract with DCHZI Bioenergy, LLC, which owns and operates the facility that will process Twin Cities metro area organic waste. CenterPoint Energy did not purchase any RNG through Pilot B in 2024. CenterPoint Energy expects to finalize a contract in 2025 and begin purchasing RNG when the project is fully operational. Currently, the estimated date of operation is in 2027.

The Company committed to encouraging and supporting DCHZI's community engagement efforts and providing updates on those efforts in its annual reports.[25] CenterPoint Energy is still working to finalize its contract with DCHZI and so has not yet worked with them on community engagement. The Company will report on any support of DCHZI's community engagement efforts in its next year's report.

Since no RNG was purchased in 2024, CenterPoint Energy has not yet implemented its verification, tracking, and retirement plan for the environmental attributes as described in its filed Plan.[26] CenterPoint Energy does not anticipate any changes to its planned approach at this time.

2. Pilot C: RNG RFP Purchase

Under this pilot, CenterPoint Energy issued an RFP to purchase RNG from various sources.

[25] NGIA Petition, Exhibit D, page 7.
[26] Plan Filing, Exhibit W.

In 2024, CenterPoint Energy purchased 0 Dth of RNG through Pilot C resulting in 0 lifecycle GHG reductions in metric tons CO_2e and 0 Dth geologic gas savings. Spending in Pilot C in 2024, and Plan development costs from before 2024 attributed to this pilot, are shown in the table below:

Table 7: Pilot C Cost Breakdown

Project Delivery	$58,231
Advertising & Promotion	$-
Allocation of General Portfolio Costs	$1,031,816
Revenue Requirement for Capital Investment	$-
Customer Incentives	$-
Total	$1,090,048
UCT Savings	$-
Total Incremental Cost Counting Against Budget	**$1,090,048**

In 2024, CenterPoint Energy issued an RFP for RNG through Pilot C, evaluated responses, and initiated negotiations with RNG providers. CenterPoint Energy did not purchase any RNG through Pilot C in calendar year 2024. CenterPoint Energy expects to finalize contracts for the purchase of RNG through this Pilot in 2025.

CenterPoint Energy committed to tracking and reporting on local co-benefits of RNG projects in Pilot C and any community engagement activities in its annual reports.[27] Because no facilities were yet under contract to provide RNG through Pilot C as of the end of 2024, CenterPoint Energy does not have anything to report yet. As noted above, CenterPoint Energy expects to finalize contracts for the purchase of RNG in 2025 and will provide updates on local co-benefits and community engagement activities in next year's report.

Since no RNG was purchased in 2024, CenterPoint Energy has not yet implemented its verification, tracking, and retirement plan for the environmental attributes as described in its filed Plan.[28] CenterPoint Energy does not anticipate any changes to its planned approach at this time.

In its Order approving CenterPoint Energy's Plan, the Commission required CenterPoint Energy to collect data on dairy cow herd size for RNG purchases from dairy farms and provide the data in its annual status reports. CenterPoint Energy is also required to provide an analysis that compares the farm sizes participating in Pilot C to the statewide average, and range, of herd sizes.[29] CenterPoint Energy provides the table below in compliance with this requirement. As noted above, CenterPoint Energy had yet to purchase any RNG through Pilot C in 2024.

[27] Plan Filing, Exhibit D, page 9-10.
[28] NGIA Petition, Exhibit W.
[29] Plan Approval Order, Order Point 4.

Table 8: Pilot C Herd Sizes for Dairy Manure RNG Purchase in 2024

Average Herd Size for RNG Purchases from Dairy Farms through Pilot C	-
Range of Herd Sizes for RNG Purchases from Dairy Farms through Pilot C (Smallest – Largest)	-
Average of Herd Sizes for Minnesota Dairy Farms[30]	294
Range of Herd Sizes of Minnesota Dairy Farms (10th percentile – 90th percentile)	43-1040

In discussions with the Department following Plan approval, the Company committed to providing cost and GHG reduction information on a per-contract basis for each RNG facility. For purpose of this metric, costs will be costs incurred by CenterPoint Energy to procure RNG under the contract and other contract-specific costs less savings from avoided natural gas commodity purchases. GHG tons reduced will be estimated lifecycle emissions reductions achieved by RNG purchases made during the year covered by the annual report. Project-specific data may be trade secret in nature. Because CenterPoint Energy did not purchase RNG under Pilot C in 2024, it has nothing to report this year but will report this information in future annual reports.

3. Pilot D: Green Hydrogen Blending into Natural Gas Distribution System

Under this pilot, CenterPoint Energy will own and operate a green hydrogen plant at an existing Company facility in Mankato Minnesota. The Company will install dedicated solar panels, an electrolyzer (assumed 1MW capacity), a hydrogen storage system, and other necessary equipment to generate, store, and blend hydrogen into the gas distribution system.

In 2024, Pilot D resulted in 0 lifecycle GHG reductions in metric tons CO_2e and 0 Dth geologic gas savings. Spending in Pilot D in 2024, and Plan development costs from before 2024 attributed to this pilot, are shown in the table below:

Table 9: Pilot D Cost Breakdown

Project Delivery	$1,793
Advertising & Promotion	$-
Allocation of General Portfolio Costs	$119,062
Revenue Requirement for Capital Investment	$-
Customer Incentives	$-
Total	$120,855
UCT Savings	$-
Total Incremental Cost Counting Against Budget	**$120,855**

[30] 2024 data on the average herd size and range of herd sizes for Minnesota taken from the University of Minnesota's FINBIN database. https://finbin.umn.edu/

Since the facility was not completed in 2024, CenterPoint Energy has not yet implemented its verification, tracking, and retirement plan for the environmental attributes as described in its filed Plan.[31] CenterPoint Energy does not anticipate any changes to its planned approach at this time. Environmental attributes from power-to-hydrogen production will be tracked on the M-RETS Renewable Thermal platform. Each facility that produces renewable fuel and environmental attributes is registered as a generator of Renewable Thermal Credits (RTC). The Company has an existing M-RETS account, to which the Mankato generator will be added, once operational, for the generation and retirement of RTCs on behalf of customers.

CenterPoint Energy committed to engaging with the City of Mankato to identify and address community questions with the hydrogen blending project. The Company will initiate discussions with Mankato city officials in 2025 regarding the addition of hydrogen equipment to an existing CenterPoint Energy site. CenterPoint Energy also stated its intention to contract services for the design and construction of the electrolyzer and solar panels from Minnesota based businesses, pay prevailing wages, and satisfy IRA apprenticeship requirements. The Company stated that it would track and report on these efforts in annual reports.[32] The Company will assess the potential for local sourcing as part of a front-end engineering design study and site plan.

4. Pilot E: Industrial or Large Commercial Hydrogen and Carbon Capture Incentives

Under this pilot, CenterPoint Energy will identify a small number of large commercial or industrial customers interested in installing either power-to-hydrogen or carbon capture demonstration projects and support their projects by providing financial assistance towards feasibility studies and project costs.

In 2024, 0 customers completed a study through Pilot E and the Company paid rebates to 0 customers. The pilot resulted in 0 lifecycle GHG reductions in metric tons CO_2e and 0 Dth geologic gas savings. Spending in Pilot E in 2024, and Plan development costs from before 2024 attributed to this pilot, are shown in the table below:

Table 10: Pilot E Cost Breakdown

Project Delivery	$1,793
Advertising & Promotion	$-
Allocation of General Portfolio Costs	$97,206
Revenue Requirement for Capital Investment	$-
Customer Incentives	$-
Total	$98,999
UCT Savings	$-
Total Incremental Cost Counting Against Budget	**$98,999**

[31] NGIA Petition, Exhibit W.
[32] NGIA Petition, Exhibit D, pages 12-13.

Work did not commence on Pilot E in 2024. In 2025, CenterPoint Energy has begun efforts on an initial scoping study to aid with customer identification.

The Company committed to encouraging and supporting Pilot E participants' community engagement efforts and providing updates on those efforts in its annual reports.[33] Because there are not yet any participants in this program, there is no information to report.

Because there were no participants in 2024, CenterPoint Energy has not yet implemented its verification, tracking, and retirement plan for the environmental attributes as described in its filed Plan.[34] CenterPoint Energy does not anticipate any changes to its planned approach at this time.

In its Order approving CenterPoint Energy's Plan, the Commission required CenterPoint Energy to include information about how it is working with its customers to identify opportunities to work on a hydrogen project for an industrial process customer within the Pilot E Power-to-Hydrogen Archetype.[35] As a first step towards this, CenterPoint Energy intends to explore what kinds of industrial process customers might be best suited to a hydrogen system as part of the scoping study it intends to complete in 2025. Information from the scoping study will inform the Company's subsequent customer outreach efforts.

In discussions with the Department following Plan approval, CenterPoint Energy committed to providing cost and GHG reduction information for each project, as defined by individual participant for this pilot. For purposes of this metric, costs will be attributed to individual participants (e.g. participant incentives) but may not include pilot costs that are not easily attributed to individual participants. GHG tons reduced will be estimated lifetime emissions reductions achieved by projects undertaken during the year covered by the annual report. Project specific data may be trade secret in nature. Because CenterPoint Energy did not have any participants in Pilot E in 2024, it has nothing to report this year but will report this information in future annual reports.

5. Pilot F: Industrial Methane and Refrigerant Leak Reduction

Under this pilot, CenterPoint Energy will hire a vendor to conduct surveys of participating industrial and large commercial facilities for methane and refrigerant leaks behind the customer gas meter. CenterPoint Energy will also offer incentives to partially offset the cost of leak repair.

In 2024, 0 customers received a survey through Pilot F and the Company paid 0 customers rebates for leak repair. The pilot resulted in 0 lifecycle GHG reductions in metric tons CO_2e and 0 Dth geologic gas savings. 0 metric tons of lifecycle GHG savings were attributable to repair of methane leaks and 0 were attributable to repair of refrigerant leaks. Spending in Pilot F in 2024, and Plan development costs from before 2024 attributed to this pilot, are shown in the table below:

[33] NGIA Petition, Exhibit D, page 17.
[34] NGIA Petition, Exhibit W.
[35] Plan Approval Order, Order Point 7.

Table 11: Pilot F Cost Breakdown

Project Delivery	$5,378
Advertising & Promotion	$-
Allocation of General Portfolio Costs	$31,971
Revenue Requirement for Capital Investment	$-
Customer Incentives	$-
Total	$37,349
UCT Savings	$-
Total Incremental Cost Counting Against Budget	**$37,349**

CenterPoint Energy issued a request for proposals in early 2025 to select a vendor for this pilot. The Company also identified internal staffing needs with the intent to finalize program design and launch the pilot, including preliminary customer participation, in 2025.

Because there were no participants in 2024, CenterPoint Energy has not yet implemented its verification, tracking, and retirement plan for the environmental attributes as described in its filed Plan.[36] CenterPoint Energy does not anticipate any changes to its planned approach at this time.

In its Order approving CenterPoint Energy's Plan, the Commission required that CenterPoint Energy report on the number of customers determined to have zero leaks, the average leak rate per screened customer, the maximum leak rate for screened customers and the minimum leak rate for screened customers.[37] CenterPoint Energy provides the table below in compliance with this requirement. As noted above, this Pilot did not launch in calendar year 2024.

Table 12: Pilot F Leak Statistics in 2024

Number of Customers Determined to Have Zero Leaks	-
Average Leak Rate per Screened Customer	-
Maximum Leak Rate per Screened Customer	-
Minimum Leak Rate per Screened Customer	-

6. Pilot G: Urban Tree Carbon Offsets

Under this pilot, CenterPoint Energy will purchase carbon offsets from local non-profit, Green Cities Accord. Green Cities Accord works with local tree planting partners across the 7-county Twin Cities Metro area to plant trees in urban areas and funds their work by selling carbon offsets.

[36] NGIA Petition, Exhibit W.
[37] Plan Approval Order, Order Point 8.

In 2024, the pilot resulted in 0 lifecycle GHG reductions in metric tons CO_2e and 0 Dth geologic gas savings. Spending in Pilot G in 2024, and Plan development costs from before 2024 attributed to this pilot, are shown in the table below:

Table 13: Pilot G Cost Breakdown

Project Delivery	$1,793
Advertising & Promotion	$-
Allocation of General Portfolio Costs	$8,437
Revenue Requirement for Capital Investment	$-
Customer Incentives	$-
Total	$10,230
UCT Savings	$-
Total Incremental Cost Counting Against Budget	**$10,230**

CenterPoint Energy intends to begin purchasing credits in calendar year 2025 and has discussed these plans with Green Cities Accord.

CenterPoint Energy committed to support and participate in Green Cities Accord's and/or partner organizations' community engagement efforts, as appropriate, and report on these activities in annual reports.[38] CenterPoint Energy had not purchased any credits through this pilot as of the end of 2024 but will work with Green Cities Accord in 2025 to support and participate in their community engagement efforts.

Because no offsets were purchased in 2024, CenterPoint Energy has not yet implemented its verification, tracking, and retirement plan for the environmental attributes as described in its filed Plan.[39] CenterPoint Energy does not anticipate any changes to its planned approach at this time.

In its Order approving CenterPoint Energy's Plan, the Commission required that CenterPoint Energy report on the number of carbon offsets purchased by CenterPoint Energy as part of the Pilot. Beginning with the Company's second annual status report, to be filed in 2026, the Company must also report, to the best of its ability, on the number of new trees planted by Green Cities Accord in the previous year and the average cost of those trees.[40] CenterPoint Energy provides the table below in compliance with this requirement. As noted above, this Pilot did not launch in calendar year 2024.

Table 14: Offset and Tree Planting Statistics in 2024

Number of Offsets Purchased	-
Number of New Trees Planted	To be provided starting with next year's report
Average Cost of New Trees Planted	To be provided starting with next year's report

[38] NGIA Petition, Exhibit D, page 22.
[39] Plan Filing, Exhibit W.
[40] Plan Approval Order, Order Point 10.

7. Pilot H: Carbon Capture Rebates for Commercial Buildings

Under this pilot, CenterPoint Energy will provide rebates to commercial customers that install CarbinX carbon capture systems manufactured by Clean O2. These units connect to existing natural gas heating equipment, capture CO_2, and convert it into chemicals that are resold for commercial uses.

In 2024, 0 customers installed a carbon capture system through Pilot H. The pilot resulted in 0 lifecycle GHG reductions in metric tons CO_2e and 0 Dth geologic gas savings. Spending in Pilot H in 2024, and Plan development costs from before 2024 attributed to this pilot, are shown in the table below:

Table 15: Pilot H Cost Breakdown

Project Delivery	$1,793
Advertising & Promotion	$-
Allocation of General Portfolio Costs	$15,690
Revenue Requirement for Capital Investment	$-
Customer Incentives	$-
Total	$17,483
UCT Savings	$-
Total Incremental Cost Counting Against Budget	**$17,483**

CenterPoint Energy did not launch this pilot in 2024.

CleanO2 is developing a next generation of its product (version 4.0) that captures a higher proportion of carbon emissions. This product will be field tested in the "Assessing Next Generation Micro-Carbon Capture for Commercial Buildings" R&D project. If results of that R&D project are favorable, CarbinX version 4.0 would be eligible for rebates through this pilot. Updated energy savings algorithms would be provided in an annual status report.[41] CenterPoint Energy has not yet completed the "Assessing Next Generation Micro-Carbon Capture for Commercial Buildings" R&D project and therefore is not providing updated savings algorithms at this time.

Because there were no participants in 2024, CenterPoint Energy has not yet implemented its verification, tracking, and retirement plan for the environmental attributes as described in its filed Plan.[42] CenterPoint Energy does not anticipate any changes to its planned approach at this time.

In discussions with the Department following Plan approval, CenterPoint Energy committed to providing cost and GHG reduction information for projects installed through this pilot showing a

[41] NGIA Petition, Exhibit D, page 26.
[42] NGIA Petition, Exhibit W.

distribution of estimated GHG emission reduction and cost by groups (e.g. X projects fall between Y and Z tons of emissions reduction), where feasible. For purposes of this metric, costs will be CenterPoint Energy incurred expenses attributable to individual participants (e.g. participant incentives) but may not include pilot costs that are not easily attributed to individual participants. Project-specific data may be trade secret in nature. Because CenterPoint Energy did not have any participants in Pilot H in 2024, it has nothing to report this year but will report this information in future annual reports.

8. Pilot I: New Networked Geothermal Systems

Under this pilot, CenterPoint Energy will develop a new networked geothermal system to provide building heating and cooling for a neighborhood currently served by the Company. This pilot starts with a study phase to identify the location, technologies, and business model for the system.

In 2024, the pilot resulted in 0 lifecycle GHG reductions in metric tons CO_2e and 0 Dth geologic gas savings. Spending in Pilot H in 2024, and Plan development costs from before 2024 attributed to this pilot, are shown in the table below:

Table 16: Pilot I Cost Breakdown

Project Delivery	$44,818
Advertising & Promotion	$-
Allocation of General Portfolio Costs	$297,875
Revenue Requirement for Capital Investment	$-
Customer Incentives	$-
Total	$342,693
UCT Savings	$-
Total Incremental Cost Counting Against Budget	**$342,693**

In 2025, CenterPoint Energy will complete an RFP to select a vendor that will support the site selection and feasibility study. The Company will initiate work with the vendor to develop detailed criteria for the identification and evaluation of potential locations for the networked geothermal system within the Company's Minnesota service territory. The Company will work with the vendor to identify 1 to 3 final candidate sites that will proceed to the detailed system design phase of the project and undergo further technical analysis. The final project site location will be chosen from these final candidate sites during the detailed system design phase. The Company will also look to the vendor to support Company-led community and regulatory interested party engagement initiatives throughout the lifespan of the project.

Because the networked geothermal system was not completed in 2024, CenterPoint Energy has not yet implemented its verification, tracking, and retirement plan for the environmental

attributes as described in its filed Plan.[43] CenterPoint Energy does not anticipate any changes to its planned approach at this time.

In its Order approving CenterPoint Energy's Plan, the Commission required CenterPoint Energy to file the result of its feasibility study in an annual report or in a separate filing in this docket for Commission review and approval prior to implementation if the feasibility study indicates that the total plan costs will exceed plan estimates by more than ten percent or lifetime estimates of GHG emissions reductions will be less than 90 percent of what was estimated in the Plan. The Commission also listed certain information that the feasibility study must include.[44] As noted above, CenterPoint Energy has not yet completed the feasibility study for this pilot.

The Commission also required that CenterPoint Energy file additional information with this status report about how it will facilitate regulatory interested party and community engagement for Pilot I. The Company's discussion must detail how the Company will engage with potential host communities to inform decisions about the project location, as well as a description of regulatory interested party and community engagement CenterPoint Energy has engaged in to date.[45] The Company has developed a living document that will be adjusted based on continual feedback; the May, 2025 version of the New Networked Geothermal Engagement Plan is included as Exhibit I.

CenterPoint Energy is further required to provide information and updates on the request for information ("RFI") process and responses in annual status reports, including how CenterPoint Energy considered opportunities to install a networked geothermal system in a low-income and/or environmental justice area and in areas of its system with upcoming pipe replacements and upgrades along with other considerations including the suitability of sites from an engineering and technological perspective and customer service preferences.[46] CenterPoint Energy issued an RFI in December, 2024[47] to over 200 entities, including cities, townships, counties and tribal communities that are currently served and received preliminary interest from over 40 entities in January, 2025. Responses were received from a wide range of community sizes including multiple metro, suburban, and rural areas of CenterPoint Energy's Minnesota service territory. Communities were invited to share any sustainability or decarbonization goals and a variety of existing or near future goals were included in community responses. Approximately one third of interested respondents have already considered potential locations in their communities for networked geothermal systems and many are looking into external funding sources at state and federal levels to support geothermal project development.

[43] NGIA Petition, Exhibit W.
[44] Plan Approval Order, Order Point 12.
[45] *Id.* NGIA Petition, Exhibit D, page 29.
[46] Plan Approval Order, Order Point 16.
[47] centerpointenergy.com/en-us/corporate/about-us/news/1925

9. Pilot J: Decarbonizing Existing District Energy Systems

Under this Pilot, CenterPoint Energy will help existing district energy systems that currently use geologic gas to identify opportunities to reduce the lifecycle GHG impact of their systems via funding for feasibility studies and financial support for following through with study recommendations.

In 2024, 0 customers completed a decarbonization study through Pilot J and the Company paid incentives to 0 customers. The pilot resulted in 0 lifecycle GHG reductions in metric tons CO_2e and 0 Dth geologic gas savings. Spending in Pilot J in 2024, and Plan development costs from before 2024 attributed to this pilot, are shown in the table below:

Table 17: Pilot J Cost Breakdown

Project Delivery	$5,378
Advertising & Promotion	$-
Allocation of General Portfolio Costs	$15,342
Revenue Requirement for Capital Investment	$-
Customer Incentives	$30,000
Total	$50,720
UCT Savings	$-
Total Incremental Cost Counting Against Budget	**$50,720**

A large customer, Hennepin County, was identified during the Company's Plan development and approval process for a decarbonization study of the downtown Minneapolis Hennepin County Energy Center and its existing district energy system. The study was conducted and a final report was issued in late 2023, with an incentive paid to the customer in 2023. The study identified several GHG reduction projects that would likely be eligible for incentives through this NGIA pilot if the County moves forward with implementation. The Company is in regular contact with this customer and may identify additional customers in 2025.

The Company committed to encouraging and supporting Pilot J participants' community engagement efforts and providing updates on those efforts in its annual reports.[48] To date, Hennepin County has shared the findings of their decarbonization study with County Administration and several of their partners and customers. CenterPoint Energy will support Hennepin County in future outreach efforts as appropriate should GHG reduction projects move forward.

Because no participants implemented projects in 2024, CenterPoint Energy has not yet implemented its verification, tracking, and retirement plan for the environmental attributes as described in its filed Plan.[49] CenterPoint Energy does not anticipate any changes to its planned approach at this time.

[48] NGIA Petition, Exhibit D, page 32.
[49] Plan Filing, Exhibit W.

In its Order approving CenterPoint Energy's Plan, the Commission ordered that CenterPoint Energy must offer customers the option to include a full electrification/decarbonization scenario in the feasibility study for Pilot J and include the number of customers who choose to study a full decarbonization/electrification scenario in the annual status report filing.[50] In 2024, no customers selected to study a full decarbonization/electrification scenario. The Company notes that the study previously conducted by Hennepin County did consider an all-electric scenario.

In discussions with the Department following Plan approval, CenterPoint Energy committed to providing cost and GHG reduction information for each project, as defined by individual participant for this Pilot. For purposes of this metric, costs will be attributed to individual participants (e.g. participant incentives) but may not include pilot costs that are not easily attributed to individual participants. GHG tons reduced will be estimated lifetime emissions reductions achieved by projects undertaken during the year covered by the annual report. Project specific data may be trade secret in nature. Because CenterPoint Energy did not have any participants who implemented projects in Pilot J in 2024, it has nothing to report this year but will report this information in future annual reports.

10. Pilot K: New District Energy System

Under this pilot, CenterPoint Energy will help current natural gas customers considering developing district energy systems by providing funding for feasibility studies and financial support to follow through with feasibility study recommendations.

In 2024, 0 customers completed a survey through Pilot K and the Company paid rebates to 0 customers. The pilot resulted in 0 lifecycle GHG reductions in metric tons CO_2e and 0 Dth geologic gas savings. Spending in Pilot K in 2024, and Plan development costs from before 2024 attributed to this pilot, are shown in the table below:

Table 18: Pilot K Cost Breakdown

Project Delivery	$5,378
Advertising & Promotion	$-
Allocation of General Portfolio Costs	$5,525
Revenue Requirement for Capital Investment	$-
Customer Incentives	$-
Total	$10,903
UCT Savings	$-
Total Incremental Cost Counting Against Budget	**$10,903**

In 2024, CenterPoint Energy began discussions with existing customers to evaluate opportunities for potential pilot participation.

[50] Plan Approval Order, Order Point 18.

The Company committed to encouraging and supporting Pilot K participants' community engagement efforts and providing updates on those efforts in its annual reports.[51] Because there were no participants in Pilot K as of the end of 2024, the Company does not yet have anything to report. The Company will provide an update on its efforts to engage in and support community engagement efforts for any 2025 participants in next year's report.

Because there were no participants in 2024, CenterPoint Energy has not yet implemented its verification, tracking, and retirement plan for the environmental attributes as described in its filed Plan.[52] CenterPoint Energy does not anticipate any changes to its planned approach at this time.

In discussions with the Department following Plan approval, CenterPoint Energy committed to providing cost and GHG reduction information for each project, as defined by individual participant for this pilot. For purposes of this metric, costs will be attributed to individual participants (e.g. participant incentives) but may not include pilot costs that are not easily attributed to individual participants. GHG tons reduced will be estimated lifetime emissions reductions achieved by projects undertaken during the year covered by the annual report. Project specific data may be trade secret in nature. Because CenterPoint Energy did not have any participants in Pilot K in 2024, it has nothing to report this year but will report this information in future annual reports.

11. Pilot L: Industrial Electrification Incentives

Under this pilot, CenterPoint Energy will support industrial customers to electrify low-to-medium heat processes using heat pump technologies. This pilot begins with a study phase to identify promising heat pump technologies and potential industrial applications.

In 2024, 0 customers completed a study through Pilot L and the Company supported installation costs for 0 customers. The pilot resulted in 0 lifecycle GHG reductions in metric tons CO_2e and 0 Dth geologic gas savings. Spending in Pilot L in 2024, and Plan development costs from before 2024 attributed to this pilot, are shown in the table below:

Table 19: Pilot L Cost Breakdown

Project Delivery	$1,793
Advertising & Promotion	$-
Allocation of General Portfolio Costs	$12,924
Revenue Requirement for Capital Investment	$-
Customer Incentives	$-
Total	$14,717
UCT Savings	$-
Total Incremental Cost Counting Against Budget	**$14,717**

[51] NGIA Petition, Exhibit D, page 35.
[52] NGIA Petition, Exhibit W.

The Company did not launch this pilot in 2024 but intends to dedicate internal staffing resources in 2025.

Because there were no participants in 2024, CenterPoint Energy has not yet implemented its verification, tracking, and retirement plan for the environmental attributes as described in its filed Plan.[53] CenterPoint Energy does not anticipate any changes to its planned approach at this time.

In discussions with the Department following Plan approval, CenterPoint Energy committed to providing cost and GHG reduction information for each project, as defined by individual participant for this pilot. For purposes of this metric, costs will be attributed to individual participants (e.g. participant incentives) but may not include pilot costs that are not easily attributed to individual participants. GHG tons reduced will be estimated lifetime emissions reductions achieved by projects undertaken during the year covered by the annual report. Project specific data may be trade secret in nature. Because CenterPoint Energy did not have any participants in Pilot L in 2024, it has nothing to report this year but will report this information in future annual reports.

12. Pilot M: Commercial Hybrid Heating

Under this pilot, CenterPoint Energy will provide support for small-to-medium commercial buildings interested in replacing Heating, Ventilation, and Air Conditioning ("HVAC") systems with hybrid systems using electric heat pumps and gas backup.

In 2024, 0 customers installed heating systems through Pilot M. The pilot resulted in 0 lifecycle GHG reductions in metric tons CO_2e and 0 Dth geologic gas savings. Spending in Pilot M in 2024, and Plan development costs from before 2024 attributed to this pilot, are shown in the table below:

Table 20: Pilot M Cost Breakdown

Project Delivery	$5,378
Advertising & Promotion	$-
Allocation of General Portfolio Costs	$181,109
Revenue Requirement for Capital Investment	$-
Customer Incentives	$-
Total	$186,487
UCT Savings	$-
Total Incremental Cost Counting Against Budget	**$186,487**

CenterPoint Energy did not begin work on this pilot in 2024. In 2025 CenterPoint Energy issued an RFP and intends to contract with qualified vendors for both the implementation and the measurement and verification components of the pilot in 2025. The selected vendor(s) will work

[53] NGIA Petition, Exhibit W.

with the Company to develop tracking for savings and spending, with initial installation of units targeted for later this year.

CenterPoint Energy plans to engage a third party to develop and implement a measurement and verification plan to analyze system performance in a variety of buildings. CenterPoint Energy may use the results of the measurement and verification to establish a deemed calculated savings algorithm to calculate annual energy savings and carbon reductions in subsequent years of the program. Customers or the program vendor will provide required inputs when applying for an incentive. CenterPoint Energy will propose this methodology in an annual status report prior to implementation.[54] CenterPoint Energy has not yet launched Pilot M and therefore has no methodology to propose at this time.

Because there were no participants in 2024, CenterPoint Energy has not yet implemented its verification, tracking, and retirement plan for the environmental attributes as described in its filed Plan.[55] CenterPoint Energy does not anticipate any changes to its planned approach at this time.

In its Order approving CenterPoint Energy's Plan, the Commission ordered CenterPoint Energy to monitor the number and type of customers that enroll in Pilot M and report its findings in annual status reports. If CenterPoint Energy finds that a disproportionately low number of participants are small businesses or are located in environmental justice areas, CenterPoint Energy must include a discussion in its annual status report of the potential causes of lower participation by small businesses and businesses located in environmental justice areas and discuss whether program modifications are warranted to increase participation by those groups.[56] CenterPoint Energy provides the table below in compliance with this requirement. As noted above, this Pilot did not launch in calendar year 2024.

Table 21: Small Business and Environmental Justice Area Participation in 2024

Total Participation in Pilot	-
Small Business Participants	-
Participants in Environmental Justice Areas	-

There was not a disproportionately low number of small business participants or participants located in environmental justice areas in 2024, accordingly CenterPoint Energy does not believe any related program modifications are necessary at this time.

In discussions with the Department following Plan approval, CenterPoint Energy committed to providing information on cost, system tonnage, and GHG information for projects installed including a distribution of estimated GHG emission reduction, tonnage, and cost by groups (e.g. X projects fall between Y and Z tons of emissions reduction), where feasible. For purposes of this metric, cost will be CenterPoint Energy incurred expenses attributable to individual participants (e.g. participant incentives) but may not include pilot costs that are not easily

[54] NGIA Petition, Exhibit D, page 40.
[55] NGIA Petition, Exhibit W.
[56] Plan Approval Order, Order Point 22.

attributed to individual participants. Project-specific data may be trade secret in nature. Because CenterPoint Energy did not have any participants in Pilot M in 2024, it has nothing to report this year but will report this information in future annual reports.

13. Pilot N: Residential Deep Energy Retrofits and Electric Air Source Heat Pumps

Under this pilot, CenterPoint Energy will provide support for residential customers interested in retrofitting their homes to significantly improve energy efficiency and installing air source heat pumps with gas back-up. This pilot starts with a study phase to identify appropriate measures and home characteristics for deep energy retrofits.

In 2024, 0 customers completed home retrofits and installed new heating systems through Pilot N. The pilot resulted in 0 lifecycle GHG reductions in metric tons CO_2e and 0 Dth geologic gas savings. Spending in Pilot N in 2024, and Plan development costs from before 2024 attributed to this pilot, are shown in the table below:

Table 22: Pilot N Cost Breakdown

Project Delivery	$12,549
Advertising & Promotion	$-
Allocation of General Portfolio Costs	$348,905
Revenue Requirement for Capital Investment	$-
Customer Incentives	$-
Total	$361,454
UCT Savings	$-
Total Incremental Cost Counting Against Budget	**$361,454**

In spring 2025, CenterPoint Energy worked toward securing a vendor for implementation of Phase 1 of this pilot and signed a contract with a vendor in May 2025. Phase 1 involves the modeling of different combinations of residential building types and energy conservation strategies, including innovative and emerging weatherization measures. The findings from Phase 1 will inform the subsequent phases of this pilot which involve demonstration projects and then broader deployment.

CenterPoint Energy intends to host one or more public meetings during the implementation planning process for this pilot to gather additional feedback from members of impacted communities, targeted customers, and other interested parties, including feedback on equity and diversity considerations for program implementation. Specifically, CenterPoint Energy will include an assessment and discussion of approaches to address equity and inclusion during the design of Phases 2 and 3, including community outreach and workshops. CenterPoint Energy will target that at least 40 percent of residential units served by the pilot qualify as low income, as that term is defined in the Conservation Improvement Program ("CIP")/Energy Conservation and Optimization ("ECO") program, or are located in a disadvantaged community, as that term is defined by the federal government for the IRA programs. CenterPoint Energy will track and

report on these efforts in annual reports.[57] CenterPoint Energy is still working towards implementing Phase 1 of this pilot and, accordingly, has not yet completed this outreach. The Company will report on these efforts in a future annual report.

CenterPoint Energy will reevaluate the likelihood of participant tax credits and/or rebates prior to launch of Phase 3 and include updated information in an annual NGIA status report.[58] CenterPoint Energy committed to providing this information in its first annual status report, however, CenterPoint Energy has no further information to offer beyond what was included in the NGIA Petition at this time as the Company is still working towards launching Phase 1 of the pilot. CenterPoint Energy will continue to monitor development of the IRA Home Efficiency Rebates and Home Electrification and Appliance Rebates programs at the Minnesota Department of Commerce as well as any changes to applicable tax credits. When Phase 3 is designed, the Company should be able to provide additional information about how program design relates to available incentives. The Company will report on these efforts in a future annual report.

Because there were no participants in 2024, CenterPoint Energy has not yet implemented its verification, tracking, and retirement plan for the environmental attributes as described in its filed Plan.[59] CenterPoint Energy does not anticipate any changes to its planned approach at this time.

14. Pilot O: Small/Medium Business GHG Audit

Under this pilot, CenterPoint Energy has expanded its pre-existing ECO Natural Gas Energy Analysis ("NGEA") project to include identification of non-ECO GHG reducing opportunities for small and medium-sized businesses.

In 2024, 0 customers completed audits through Pilot O. The pilot resulted in 0 lifecycle GHG reductions in metric tons CO_2e and 0 Dth geologic gas savings. Spending in Pilot O in 2024, and Plan development costs from before 2024 attributed to this pilot, are shown in the table below:

Table 23: Pilot O Cost Breakdown

Project Delivery	$17,549
Advertising & Promotion	$-
Allocation of General Portfolio Costs	$51,166
Revenue Requirement for Capital Investment	$-
Customer Incentives	$-
Total	$68,715
UCT Savings	$-
Total Incremental Cost Counting Against Budget	**$68,715**

[57] NGIA Petition, Exhibit D, pages 45-46 and Reply Comments page 25.
[58] NGIA Petition, Exhibit D, page 45.
[59] NGIA Petition, Exhibit W.

In 2024, CenterPoint Energy executed a contract with a vendor for implementation of this pilot. Customers began receiving audits in early 2025.

Because there were no participants in 2024, CenterPoint Energy has not yet implemented its verification, tracking, and retirement plan for the environmental attributes as described in its filed Plan.[60] CenterPoint Energy does not anticipate any changes to its planned approach at this time.

In discussions with the Department following Plan approval, CenterPoint Energy committed to providing cost and GHG information for each type of measure installed including a distribution of estimated GHG emission reduction and cost by groups (e.g. X measures fall between Y and Z tons of emissions reduction), where feasible. For purposes of this metric, cost will be CenterPoint Energy incurred expenses attributable to individual measures (e.g. participant incentives) but may not include pilot costs that are not easily attributed to individual participants or measures. Project-specific data may be trade secret in nature. Because CenterPoint Energy did not have any participants in Pilot O in 2024, it has nothing to report this year but will report this information in future annual reports.

15. Pilot P: Residential Gas Heat Pumps

Under this pilot, CenterPoint Energy will fund the development and testing of a small number of 'combi' space and water heating gas heat pump systems in Minnesota homes.

In 2024, 0 heat pumps were installed through Pilot P. The pilot resulted in 0 lifecycle GHG reductions in metric tons CO_2e and 0 Dth geologic gas savings. Spending in Pilot P in 2024, and Plan development costs from before 2024 attributed to this pilot, are shown in the table below:

Table 24: Pilot P Cost Breakdown

Project Delivery	$1,793
Advertising & Promotion	$-
Allocation of General Portfolio Costs	$9,756
Revenue Requirement for Capital Investment	$-
Customer Incentives	$-
Total	$11,548
UCT Savings	$-
Total Incremental Cost Counting Against Budget	**$11,548**

CenterPoint Energy intends to begin work on this pilot in 2025.

Because there were no participants in 2024, CenterPoint Energy has not yet implemented its verification, tracking, and retirement plan for the environmental attributes as described in its filed

[60] NGIA Petition, Exhibit W.

Plan.[61] CenterPoint Energy does not anticipate any changes to its planned approach at this time.

In its Order approving CenterPoint Energy's Plan, the Commission required CenterPoint Energy to report on continuous field performance monitoring, bill savings, equipment costs, and installation costs for Pilot P in its annual status reports.[62] As noted above, this Pilot did not launch in 2024. Accordingly, CenterPoint Energy does not yet have data to report.

In discussions with the Department following Plan approval, CenterPoint Energy committed to providing information on cost and GHG information for each type of measure installed including a distribution of estimated GHG emission reduction and cost by groups (e.g. X measures fall between Y and Z tons of emissions reduction), where feasible. For purposes of this metric, cost will be CenterPoint Energy incurred expenses attributable to individual measures (e.g. participant incentives) but may not include pilot costs that are not easily attributed to individual participants or measures. Different models of gas heat pumps will be considered different measures. Project-specific data may be trade secret in nature. Because CenterPoint Energy did not have any participants in Pilot P in 2024, it has nothing to report this year but will report this information in future annual reports.

16. Pilot Q: Gas Heat Pumps for Commercial Buildings

Under this pilot, CenterPoint Energy will fund the development and testing of a small number of gas heat pump systems in in commercial buildings.

In 2024, 0 heat pumps were installed through Pilot Q. The pilot resulted in 0 lifecycle GHG reductions in metric tons CO_2e and 0 Dth geologic gas savings. Spending in Pilot Q in 2024, and Plan development costs from before 2024 attributed to this pilot, are shown in the table below:

Table 25: Pilot Q Cost Breakdown

Project Delivery	$1,793
Advertising & Promotion	$-
Allocation of General Portfolio Costs	$19,202
Revenue Requirement for Capital Investment	$-
Customer Incentives	$-
Total	$20,995
UCT Savings	$-
Total Incremental Cost Counting Against Budget	**$20,995**

CenterPoint Energy intends to begin work on this pilot in 2025.

[61] NGIA Petition, Exhibit W.
[62] Plan Approval Order, Order Point 23.

Because there were no participants in 2024, CenterPoint Energy has not yet implemented its verification, tracking, and retirement plan for the environmental attributes as described in its filed Plan.[63] CenterPoint Energy does not anticipate any changes to its planned approach at this time.

In discussions with the Department following Plan approval, CenterPoint Energy committed to providing information on cost and GHG information for each type of measure installed including a distribution of estimated GHG emission reduction and cost by groups (e.g. X measures fall between Y and Z tons of emissions reduction), where feasible. For purposes of this metric, cost will be CenterPoint Energy incurred expenses attributable to individual measures (e.g. participant incentives) but may not include pilot costs that are not easily attributed to individual participants or measures. Different models of gas heat pumps will be considered different measures. Project-specific data may be trade secret in nature. Because CenterPoint Energy did not have any participants in Pilot Q in 2024, it has nothing to report this year but will report this information in future annual reports.

17. Pilot R: Industrial and Large Commercial GHG Audit

Under this pilot, CenterPoint Energy has expanded its existing ECO Process Efficiency and Commercial Efficiency projects to include identification of non-ECO GHG reduction measures and payment of incentives for the installation of identified non-ECO measures.

In 2024, 0 customers received an audit through Pilot R and 0 customers received a rebate through the pilot. The pilot resulted in 0 lifecycle GHG reductions in metric tons CO_2e and 0 Dth geologic gas savings. Spending in Pilot R in 2024, and Plan development costs from before 2024 attributed to this pilot, are shown in the table below:

Table 26: Pilot R Cost Breakdown

Project Delivery	$17,549
Advertising & Promotion	$-
Allocation of General Portfolio Costs	$19,202
Revenue Requirement for Capital Investment	$-
Customer Incentives	$-
Total	$36,751
UCT Savings	$-
Total Incremental Cost Counting Against Budget	**$36,751**

In 2024, CenterPoint Energy contracted with an implementation vendor for delivery of this pilot. The Company has started to enroll customers participating in existing commercial and industrial audit programs into programs expanded via this NGIA pilot beginning in 2025.

Because there were no participants in 2024, CenterPoint Energy has not yet implemented its verification, tracking, and retirement plan for the environmental attributes as described in its filed

[63] NGIA Petition, Exhibit W.

Plan.[64] CenterPoint Energy does not anticipate any changes to its planned approach at this time.

In discussions with the Department following Plan approval, CenterPoint Energy committed to providing cost and GHG information for each type of measure installed including a distribution of estimated GHG emission reduction and cost by groups (e.g. X measures fall between Y and Z tons of emissions reduction), where feasible. For purposes of this metric, cost will be CenterPoint Energy incurred expenses attributable to individual measures (e.g. participant incentives) but may not include pilot costs that are not easily attributed to individual participants or measures. Project-specific data may be trade secret in nature. Because CenterPoint Energy did not have any participants in Pilot R in 2024, it has nothing to report this year but will report this information in future annual reports.

18. Approved Research and Development Pilots

i. CenterPoint Energy Minnesota Net Zero Study

Under this R&D pilot, CenterPoint Energy will conduct a study to help it and interested parties better understand the different pathways for CenterPoint Energy Minnesota Gas to reach net zero emissions by 2050, including Scope 1 and 3 emissions.

CenterPoint Energy has not yet begun work on this R&D pilot and did not incur any costs related to this pilot in 2024 or prior years.

ii. Weatherization Blitzes

Under this R&D pilot, CenterPoint Energy will test intensive, novel, and community-based marketing and outreach approaches to increase participation in CenterPoint Energy's ECO weatherization offerings.

CenterPoint Energy did not begin work on this R&D pilot in 2024. The Company feels it would be optimal to understand the final design of the IRA Home Energy Rebate programs, to be delivered by the Department of Commerce, before selecting a vendor and finalizing pilot design. The Company will continue to monitor development of the Home Energy Rebate programs as the Department works to launch them. CenterPoint Energy did not incur any costs related to this pilot in 2024 or prior years.

iii. High Performance Commercial New Construction Building Envelope Initiative

Under this R&D pilot, CenterPoint Energy will test a multi-prong strategy to address barriers to integrating high-performance commercial building envelopes in new commercial construction.

[64] NGIA Petition, Exhibit W.

There were no activities on this R&D pilot in 2024, but in 2025 CenterPoint Energy completed a contract with a vendor for implementation. CenterPoint Energy did not incur any costs related to this pilot in 2024 or prior years.

iv. Assessing Next-Generation Micro-Carbon Capture for Commercial Buildings

Under this R&D pilot, CenterPoint Energy will investigate the carbon capture effectiveness and heat recovery efficiency of CleanO2's next generation CarbinX units (version 4.0). This pilot complements the full pilot, Carbon Capture Rebates for Commercial Buildings, which will incentivize installation of version 3.0 units.

CenterPoint Energy has not yet begun work on this R&D pilot and did not incur any costs related to this pilot in 2024 or prior years.

v. Green Ammonia Novel Technology

This R&D pilot will support testing of a Modular One Vessel Ammonia Production System for green ammonia, which has potential to improve production efficiency and reduce costs for green ammonia production.

There were no pilot activities in 2024, but in 2025 CenterPoint Energy contracted with a university to support testing of a novel green ammonia production system. CenterPoint Energy did not incur any costs related to this pilot in 2024 or prior years.

vi. RNG Potential Study

Under this R&D pilot, CenterPoint Energy will study three regions of the CenterPoint Energy Minnesota service territory for potential development of an RNG production facility. Regions will be selected based on potential for production of RNG feedstock and feasibility of accepting substantial quantities of RNG into CenterPoint Energy's system.

Agricultural Utilization Research Institute (AURI) began performing a preliminary techno-economic analysis of potential for RNG projects in three selected geographic areas in 2024. AURI will provide a report of their findings in 2025 with information to be included in the Company's next annual status report.

CenterPoint Energy incurred $15,922 in project delivery costs through 2024 for the study.

vii. Utilization of Green Ammonia for Thermal Energy Applications

Under this R&D pilot, CenterPoint Energy will support research into how green ammonia may be used in industrial-scale burner applications. The primary goal is to determine operating ranges and burner concepts that can be applied to industrial burners used in grain drying and boilers used for district heating.

The Company is in discussions with a university research team to finalize the scope of work for this project and expects to contract with the group in 2025. CenterPoint Energy did not incur any costs related to this pilot in 2024 or prior years.

X. Budget Flexibility Compliance Items

In its Order approving CenterPoint Energy's Plan, the Commission required any budget increases exceeding 25 percent of the total five-year pilot budget to go through the annual review process or be filed for comment and approval in Docket No. 23-215. CenterPoint Energy's filing must identify any avenues that could be taken to increase enrollment or improve performance of any pilots not achieving quantitative or qualitative expectations and provide a justification for why these options are not reasonable.[65] None of the pilots have yet required funding in excess of 25 percent of their total five-year budget so this requirement is not applicable to this report.

The Commission further required that the Company describe any use of budget flexibility in annual review filings and explain why the use of budget flexibility was warranted. CenterPoint Energy's justification should include an analysis of pilot performance that takes into account both participation levels and realized cost effectiveness.[66] The Company did not exercise budget flexibility for any of the pilots in 2024 so this requirement is not applicable to this Report.

XI. Cost Recovery Summary and Innovation Act Adjustment ("IAA") Proposal

1. Recovery Mechanism Overview

In its Order approving the Plan, the Commission approved CenterPoint Energy's cost recovery proposal to recoup Plan related costs using three mechanisms. CenterPoint Energy recovers Purchased Gas Adjustment ("PGA")-eligible expenses through the PGA. Other costs are recovered through a combination of base rates (the Innovation Act Charge or "IAC") and a rider with annual true-up (the Innovation Act Adjustment or "IAA").

2. Gas Cost Recovery

In its Order approving the Plan, the Commission ordered CenterPoint Energy to include relevant information from monthly PGA filings and annual automatic adjustment ("AAA") filings in its innovation plan annual reports.[67] CenterPoint Energy has attached, as Exhibit C, relevant information from its PGA and AAA filings for calendar year 2024 and provides some summary information on Plan recovery in the table below. CenterPoint Energy did not recover any Plan-related expense through the PGA in 2024.

Table 27: PGA Recovery for Plan Expenses in 2024

January NGIA Recovery through PGA	-
February NGIA Recovery through PGA	-

[65] Plan Approval Order, Order Point 26b.
[66] Plan Approval Order, Order Point 26c.
[67] Plan Approval Order, Order Point 28.

March NGIA Recovery through PGA	-
April NGIA Recovery through PGA	-
May NGIA Recovery through PGA	-
June NGIA Recovery through PGA	-
July NGIA Recovery through PGA	-
August NGIA Recovery through PGA	-
September NGIA Recovery through PGA	-
October NGIA Recovery through PGA	-
November NGIA Recovery through PGA	-
December NGIA Recovery through PGA	-
Total NGIA Recovery through PGA	**-**

3. IAA and IAC Recovery Summary

In its Plan filing, the Company committed to filing an NGIA Tracker showing the differences, if any, between NGIA recovery and expenses and propose adjustments to the IAA so as to eliminate the disparity.[68] The NGIA Tracker and Balance for calendar year 2024 is included as Exhibit D. The beginning balance as of October 9, 2024, when the Commission issued its Order approving the Plan, was an under-recovery of $1,550,961. The ending balance on December 31, 2024 was an under-recovery of $1,814,046.

CenterPoint Energy submitted a Rate Case in November of 2023[69] including a proposed Innovation Act Charge ("IAC"). The Administrative Law Judge recommended the Commission accept the settlement reached and agreed to by all parties. Additionally, the Department of Commerce filed a letter on April 18, 2025, recommending that the Commission accept the settlement. The Rate Case settlement was approved at the May 29, 2025 Agenda meeting; a formal Order will be issued in Docket Nos. G008/GR-23-173 and G008/MR-23-174. The IAC in the Settlement is $0.0618 per Dth for commercial and industrial ("C&I") customers and $0.0360 per Dth for residential customers. For purposes of projecting recovery, the Company has assumed that the Settlement IAC will go into effect in September 2025. An IAA is proposed in this filing to true-up differences between anticipated recovery under the IAC and spending on NGIA activities. The IAA would go into effect upon Commission approval, which, for purpose of projecting recovery, the Company has assumed to be in January 2026. Please see Section 4 for more discussion of the new IAA proposal.

Consistent with the Commission's decisions on the Company's ECO tracker, the proposed NGIA Tracker includes carrying charges equal to the Company's short-term cost of debt as set in CenterPoint Energy's most recent completed rate case.[70] The 2024 year-end NGIA Tracker

[68] NGIA Petition, page 21.
[69] Docket No. G-008/MR-23-173.
[70] *In the Matter of the Application of CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, for Authority to Increase Rates for Natural Gas Utility Service in Minnesota*, Docket No. G-008/GR-21-435, Order (Jan. 17, 2023).

Balance includes $3,542 in 2024 carrying charges. The calculation of the monthly interest factor is shown below:

Annual Interest Factor

= Cost of Short-Term Debt
= 0.39%

Monthly Interest Factor = ((1 + Annual Interest Factor) ^ (1/12)) - 1
= ((1 + 0.039) ^ (1/12)) - 1
= 0.0012
= 0.03%

4. IAA Proposal

i. Overview

In its Order approving the Plan, the Commission approved CenterPoint Energy's proposed recovery plan, which included a rider with annual true-up. Specifically, the Commission required that CenterPoint Energy incorporate, into its annual filing, a true-up adjustment that reconciles revenues recovered to actual costs.[71] The Company's approved recovery plan included making annual adjustments to the IAA, as necessary, to recover approved costs not recovered through the IAC, which is included in base rates, and match recovery to actual and anticipated costs.

As this is the Company's first annual status report, the current IAA is set to $0 per Dth. With this filing, CenterPoint Energy requests to increase the IAA to $0.0998 per Dth for C&I customers and $0.0636 per Dth for Residential customers upon Commission approval beginning on January 1, 2026. These rates are designed to reduce the NGIA Tracker Balance as close to zero as possible by the end of 2026. In the event that the Commission approval of the proposed adjustment is delayed beyond November 1, 2025 (in order to implement the rate change by January 1, 2026), the Company may recalculate the IAA using the same method but with updated cost and revenue information.

i. Projection Assumptions

To evaluate a new IAA proposal, the Company projected Plan spending and recovery for 2025 and 2026. Projections for 2025 and 2026 can be found in Exhibit E. Actual spending and recoveries are shown for January – April 2025. The company utilized the forecasted volumes from the 2023 Rate Case docket G-008/M-23-173 and budget from the NGIA filing docket G-008/M-23-215 to project the IAA for 2026. The proposed IAA was calculated in Microsoft Excel to reach a projected near-zero balance by the end of 2026.[72] The Company proposes to apply this adjustment in 2026 in order to reach a near-zero balance by the end of 2026 based on

[71] Plan Approval Order, Order Point 29.
[72] Actual general portfolio costs incurred from January 2025 through April 2025 have not yet been allocated by pilot, because the year hasn't been completed and the accurate percentages are not available. This will be updated in next year's filing.

actual and forecasted revenues and expenditures.

In preparing this annual report and reviewing all NGIA costs incurred, the Company determined that certain costs for which it requested recovery in docket G-008/M-23-173 were expensed in 2022 and therefore were included in the base year of its rate case, docket G-008/GR-23-173. The total amount that was inadvertently expensed was $318,693.20. The Company did not intentionally include these costs in the 2023 Rate Case and therefore is adjusting these expenses in the IAA calculation to avoid over collection, including inflation rates that were used and approved in the 2023 Rate Case. See Line 5 from 2023 to 2026 of the NGIA Annual Tracker and Forecasts in Exhibits D and E of this of this filing. The total that would be recovered in the base year, filing year, test year of 2024, plan years of 2025 and 2026 are deducted from expenses over 12 months. This adjustment avoids collection of the requested recovery in both the base rate and the IAA.

ii. Projection Results and Proposal

Projections for 2025 and 2026 show that an increase in the IAA to $0.0998 per Dth for C&I customers and $0.0636 per Dth for Residential customers taking effect on January 1, 2026, as proposed by the Company, and remaining in effect through 2026 would achieve a near-zero NGIA Tracker balance by the end of 2026. A revised tariff page is included as Exhibit J to this filing. The Company proposes the following bill message:

> *The PUC has approved an Innovation Act Adjustment (IAA) factor of $0.00998 per therm for C&I customers and $0.00636 per therm for Residential customers. This charge will be used to fund innovative decarbonization activities and has been added to your delivery charge. For more information, please call or visit our website.*

The Company's phone number and website appear near the bill message on the customer's bill.

XII. Progress Towards Achieving Cost Effectiveness Objectives

The NGIA requires CenterPoint Energy to report on its progress towards achieving the cost-effectiveness objectives established by the Commission.[73] In this section, the Company describes its progress towards meeting each objective, which are categorized as relating primarily to different cost/benefit perspectives, environmental benefits, socioeconomic benefits, or innovation benefits.

1. Perspectives

Overall GHG savings achieved by all approved pilots is achieved at a cost of no more than $200/MTCO2e. For this objective, costs are measured on a lifetime basis using the utility cost test and GHG savings are also measured on a lifetime basis.

[73] Minn. Stat. § 216B.2427, subd. 2(f)(6).

Since the Company does not have GHG savings to report in 2024, there are no costs to measure on a per ton basis. Beginning in the next annual report, CenterPoint Energy will provide available information to estimate expected lifetime cost per ton of approved pilot projects.

At least 40 percent of residential units served by the Residential Deep Energy Retrofit and Electric Air Source Heat Pumps Pilot and the Weatherization Blitzes R&D Pilot qualify as low-income, as that term is defined in CIP/ECO, or are located in a disadvantaged community, as that term is defined for the Inflation Reduction Act programs.

The Company intends to use the resources available to determine and target low-income participation, while recognizing that some federally published tools used to make these determinations have become unavailable. CenterPoint Energy will use state or local tools as available to prioritize serving low-income populations with this pilot, as feasible.

Over the course of the five-year Plan, CenterPoint Energy supports the development of four new sources of low-carbon fuels produced in Minnesota. This may include one or more anaerobic digesters that produces RNG, projects that produce hydrogen via power-to-hydrogen, biogas projects, or projects that create ammonia via power-to-ammonia.

CenterPoint Energy is supporting the development of an anaerobic digester in Shakopee, Minnesota, via the contract for the purchase of RNG mentioned in Pilot B details. More progress on this goal is expected in 2025 as the Company works toward contracting with additional RNG producers identified via RFP. The Company also expects to include a power-to-hydrogen project as a new source of low-carbon fuel produced in Minnesota.

2. Environment

The Plan achieves overall lifetime GHG emissions reductions of 1,131,000 tons CO2e.

The Company does not have GHG emissions reductions to report for 2024 but expects to make progress towards this goal beginning in 2025 as pilot projects ramp up.

Over the five-year term of the Plan, the Plan achieves annual, first-year GHG emissions reductions equal to one percent of emissions from CenterPoint Energy's 2020 sales. For purposes of this objective, CenterPoint Energy's 2020 sales include only sales to non-exempt customers and no transport volumes. Annual, first-year GHG emissions reductions are the sum of GHG reductions expected to be achieved by all projects implemented under the Plan in the first full year of their operation.

The Company expects to report on this goal as a whole following the five-year Plan term but will provide relevant data on progress as pilots are rolled out beginning in the next annual report.

In year five of the Plan, CenterPoint Energy has reduced annual emissions from sales of natural gas by 51,000 metric tons as a result of low-carbon fuels included in the NGIA Plan. This goal includes reductions from RNG, power-to-hydrogen, biogas, and power-to-ammonia provided to non-exempt sales customers

CenterPoint Energy expects to report progress on this goal beginning in the next annual report, after low-carbon fuel purchases or production have begun.

To support the state's renewable energy goal, CenterPoint Energy procures 610,000 Dth of sales gas from renewable resources. This goal includes RNG, biogas, power-to-hydrogen, and power-to-ammonia provided to non-exempt sales customers.

See previous renewable fuel goal.

To support the state's economy-wide net zero GHG emissions goal, CenterPoint Energy completes an analysis of pathways that would allow it to achieve net zero emissions by 2050. CenterPoint Energy anticipates satisfying this goal through the proposed R&D pilot, CenterPoint Energy Minnesota Net Zero Study.

CenterPoint Energy expects to achieve this goal through implementation of the R&D pilot CenterPoint Energy Minnesota Net Zero Study. As discussed above, CenterPoint Energy did not begin work on that R&D pilot in 2024.

The Plan as a whole achieves material reductions to the overall amount of natural gas produced from geologic sources delivered to CenterPoint Energy customers compared to the amount that would have been delivered absent the Company's NGIA Plan.

CenterPoint Energy did not achieve natural gas savings through NGIA in 2024.

3. Socioeconomic

The Plan supports four projects that satisfy Inflation Reduction Act requirements around prevailing wages and support for apprenticeships.

None of CenterPoint Energy's pilots were far enough along by the end of 2024 to satisfy IRA wage and labor goals.

The Plan supports workforce development through trainings, tours, educational conferences, or similar supportive activities reaching 200 participants per year, or 1,000 participants over the five-year Plan period.

CenterPoint Energy will track activities supportive of workforce development implemented as part of this Plan. The Company has primarily focused on education related to NGIA in general to date. Additional information is included in Exhibit K.

4. Innovation

The Plan supports projects using at least six of the eight innovative resources.

None of CenterPoint Energy's pilots were far enough along by the end of 2024 to use any innovative resources.

100 percent of completed R&D projects result in a report summarizing learnings and suggesting next steps that will be filed with the Commission and the Company takes action on learnings that are within CenterPoint Energy's control and reasonable to pursue, such as incorporating insights into a subsequent NGIA plan or other Company initiative.

CenterPoint Energy did not complete any R&D pilots in 2024.

XIII. Conclusion

The Company appreciates this opportunity to update the Commission and interested parties on the status of Plan implementation, and requests that the Commission approve this report and the Company's proposed IAA rates.

In the Matter of
CenterPoint Energy's Natural Gas Innovation Act (NGIA)
Innovation Plan

Annual Report for Calendar Year 2024

EXHIBIT A: ONE PAGE SUMMARY OF FILING

Docket No. G-008/M-23-215

May 30, 2025

CENTERPOINT ENERGY

SUMMARY OF FILING

Rule 7829.1300, Subp. 1

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, ("CenterPoint Energy" or the "Company") submits its Natural Gas Innovation Act (NGIA) Annual Report for Calendar Year 2025. This filing summarizes CenterPoint Energy's implementation of its approved innovation plan during calendar year 2024. This filing also includes a request for approval of the Company's December 31, 2024 NGIA tracker under-recovered balance of $1,814,046 and a request for approval of updates to the Company's tariff book to incorporate the requested Innovation Act Adjustment factor of $0.00998 per therm for C&I customers and $0.00636 per therm for Residential customers.

In the Matter of
CenterPoint Energy's Natural Gas Innovation Act (NGIA)
Innovation Plan

Annual Report for Calendar Year 2024

EXHIBIT B: COMPLIANCE MATRIX

Docket No. G-008/M-23-215

May 30, 2025

Table 1. Annual Reporting Requirements

Reporting Requirement	Reference	Pilots Affected	Location
CenterPoint must collect data on dairy cow herd size for RNG purchases from dairy farms and provide that data in their annual status reports. Through its annual status reports, CenterPoint must provide an analysis that compares the farm sizes participating in Pilot C to the statewide average, and range, of herd sizes.	NGIA Plan Order, Order Point 4.	Pilot C	Table 8
CenterPoint must include in its annual filings a description of how it is working with its customers to identify opportunities to work on a hydrogen project for an industrial process customer within the Pilot E Power-to-Hydrogen Archetype.	NGIA Plan Order, Order Point 7.	Pilot E	Section IX.4
CenterPoint must include in its annual filings information on environmental benefits of Pilot F including, but not limited to, the review period of the annual filing, the number of customers determined to have zero leaks, the average leak rate per screened customer, the maximum leak rate for screened customers, and the minimum leak rate for screened customers.	NGIA Plan Order, Order Point 8.	Pilot F	Table 12
As part of its annual status report, CenterPoint must provide information on the number of carbon offsets purchased by CenterPoint as part of Pilot G. Beginning with CenterPoint's second annual status report, CenterPoint must provide, to the best of its ability, the number of new trees planted by Green Cities Accord in the previous year and the average cost of those new trees.	NGIA Plan Order, Order Point 10.	Pilot G	Table 14

Reporting Requirement	Reference	Pilots Affected	Location
The Commission approves Pilot I as proposed but requires CenterPoint to file the results of its feasibility study for Pilot I in an annual report or in a separate filing in Docket No. 23-215 for Commission review and approval prior to implementation if the feasibility study indicates that the total costs will exceed plan estimates by more than ten percent or lifetime greenhouse gas reductions will be less than 90 percent of what was estimated in the approved plan. Pilot I's feasibility study results must include, but are not limited to, at least the following information: (a) a description of the geothermal system's characteristics (including assumed heating capacity, location, and lifespan), the type of geothermal technology to be installed, the suitability of the proposed location for the installation, the number and types of buildings to be connected, and the customers that would be served by the system; (b) a description of the project costs, broken down by installation, equipment, and operation and maintenance costs while taking into account any incentives, rebates, and tax credits assumed to reduce these costs; and (c) a description of the estimated benefits of the project, including throughput reduction, efficiency gains, load management possibilities, and customer financial benefits.	NGIA Plan Order, Order Point 12.	Pilot I	N/A. CenterPoint Energy has not yet completed the feasibility study and will file it in a future annual report.
CenterPoint must file additional information with its first annual status report about how it will facilitate stakeholder and community engagement for Pilot I. This discussion must detail how CenterPoint will engage with potential host communities to inform decisions about the project location, as well as a description of stakeholder and community engagement CenterPoint has engaged in to date.	NGIA Plan, Order Point 14.	Pilot I	Exhibit I

Reporting Requirement	Reference	Pilots Affected	Location
CenterPoint must provide information and updates on the RFI process and responses in annual NGIA status reports, including how CenterPoint considered opportunities to install a networked geothermal system in a low-income and/or environmental justice area and in areas of its system with upcoming pipe replacements and upgrades along with other considerations including the suitability of sites from an engineering and technological perspective and customer preferences.	NGIA Plan Order, Order Point 16.	Pilot I	Exhibit I, Appendix A
CenterPoint must offer customers the option to include a full electrification/decarbonization scenario in the feasibility study for Pilot J and include the number of customers who choose to study a full decarbonization/electrification scenario in the annual status report filing.	NGIA Plan Order, Order Point 18.	Pilot J	Section IX.9
CenterPoint must monitor the number and type of customers that enroll in Pilot M and report its findings in annual status reports. If CenterPoint finds that a disproportionately low number of participants are small businesses or are located in environmental justice areas, CenterPoint must include a discussion in its annual status report of the potential causes of lower participation by small businesses and businesses located in environmental justice areas and discuss whether program modifications are warranted to increase participation by those groups.	NGIA Plan Order, Order Point 22.	Pilot M	Table 21
CenterPoint must report on continuous field performance monitoring, bill savings, equipment costs, and installation costs for Pilot P in its annual status reports.	NGIA Plan Order, Order Point 23.	Pilot P	N/A. CenterPoint Energy did not launch the pilot and does not have data to report.
CenterPoint must propose R&D projects to the Commission in its annual status reports and receive approval to invest in any R&D projects that were not previously filed and approved as part of CenterPoint's 2023 Natural Gas Innovation Plan.	NGIA Plan Order, Order Point 25.	Future R&D Pilots	N/A. CenterPoint Energy is not proposing additional R&D pilots in this Report.

Reporting Requirement	Reference	Pilots Affected	Location
The Commission requires any budget increases exceeding 25 percent of the total five-year pilot budget to go through the annual review process or be filed for comment and approval in Docket No. 23-215. CenterPoint's filing must identify any avenues that could be taken to increase enrollment or improve performance of any pilots not achieving quantitative or qualitative expectations and provide a justification for why these options are not reasonable.	NGIA Plan Order, Order Point 26b.	Any/all, as applicable	N/A. CenterPoint Energy is not requesting any budget increases in this Report.
The Commission requires CenterPoint to describe any use of budget flexibility in annual review filings and explain why the use of budget flexibility was warranted. CenterPoint's justification should include an analysis of pilot performance that takes into account both participation levels and realized cost-effectiveness.	NGIA Plan Order, Order Point 26c.	Any/all, as applicable	N/A. CenterPoint Energy did not use any budget flexibility in 2024.
CenterPoint must include relevant information from monthly PGA filings and annual automatic adjustment (AAA) in its innovation plan annual reports.	NGIA Plan Order, Order Point 28.	Pilots B, C, and D	N.A. Because there was no NGIA-related gas cost recovery in 2024, there is no relevant information to report. CenterPoint Energy will provide relevant information in future annual reports.
CenterPoint must incorporate, in its annual filing, a true-up adjustment that reconciles revenues recovered to actual costs.	NGIA Plan Order, Order Point 29.	All	Section XI, Exhibits D, E, and J
CenterPoint must provide updates on IRA implementation and pilot-specific data on greenhouse gas emissions reductions.	NGIA Plan Order, Order Point 36.	All	IRA information in Section VII, GHG emissions reductions Table 1

Reporting Requirement	Reference	Pilots Affected	Location
CenterPoint Energy shall provide the following information on the plan as a whole, each individual pilot, and each research and development project in individual status reports: • Updates on progress • Results • Cost and budget impacts • Relevant updates to cost-benefit metrics	NGIA Plan Order, Order Point 37[1]	All	Quantitative information for each pilot and the plan as a whole is summarized in Tables 1-4; additional detail for each pilot is provided in Section IX; because there are no gas, electricity, or GHG savings to report there are no relevant updates to cost-benefit metrics[2]
CenterPoint must propose updates to its list of reporting requirements when proposing new, or modified, pilots and/or research and development projects.	NGIA Plan Order, Order Point 37(a)	Future Pilots and Proposed Pilot Modifications	N/A. CenterPoint Energy is not proposing new or modified pilots or R&D projects in the Report.

[1] Order Point 37 states "Within 30 days of this order, CenterPoint must propose reporting requirements for its NGIA innovation plan's annual status reports. The proposed list of reporting requirements shall include content required by the NGIA and relevant Commission Orders, and shall clearly articulate what information will be provided for each individual pilot and research and development project (including updates on progress, project results, project cost and budget impacts, and relevant updates to cost-benefit metrics using project data), and the plan in aggregate… ." CenterPoint Energy is including the reporting requirement in the table above to clarify that to the extent that other reporting requirements listed in this filing do not fully encompass updates on progress, results, cost and budget impacts, and relevant updates to cost-benefit metrics at the plan-level, pilot-level, and research-and-development-pilot-level, CenterPoint Energy will provide information on these four topics at all levels.

[2] CenterPoint Energy interprets the requirement to provide updates to cost-benefit metrics to require that the Company provide information about how it has monetized certain costs and benefits other than spend by the Company in support of NGIA Plan implementation. For example, in future years, CenterPoint Energy will estimate savings associated with reduced geologic gas purchases, the societal value of reduced GHG emissions, and participant cost savings due to reduce energy consumption. These metrics are all related to energy or GHG savings achievements, of which there were none in calendar year 2024.

Reporting Requirement	Reference	Pilots Affected	Location
CenterPoint must consult with the Minnesota Department of Agriculture regarding the possibility of incentivizing more Minnesota small family agricultural operations to participate in the development and sale of RNG. With its first annual status report, CenterPoint shall report on its discussions with the Minnesota Department of Agriculture and, depending on the results of these discussions, propose an R&D project that explores incentives to encourage Minnesota small family farms to participate in RNG markets.	NGIA Plan Order, Order Point 39.	Future R&D Pilots	Section VIII
A utility operating under an approved plan must file annual reports to the commission on work completed under the plan, including: (1) costs incurred; (2) lifecycle greenhouse gas emissions reductions or avoidance achieved; (3) a description of the processes used to track and verify the innovative resources and to retire the associated environmental attributes; (4) an assessment of the degree to which the lifecycle greenhouse gas accounting methodology is consistent with current science; (5) the economic impact of the plan, including job creation; (6) the utility's progress toward achieving the cost-effectiveness objectives established by the commission; and (7) modifications to elements of the plan proposed by the utility.	Minn. Stat. § 216B.2427, subd. 2(f).	All	Costs incurred are summarized in Table 2; GHG savings are summarized in Table 1; tracking and verification discussed with respect to each pilot in Section IX; an assessment of GHG accounting methodology and current science in Exhibit H; economic impact in Section VI; progress towards cost-effectiveness objectives in Section XII; CenterPoint Energy is not proposing any modifications to the Plan in the Report.

Reporting Requirement	Reference	Pilots Affected	Location
Where applicable, utilities shall file updated estimated greenhouse gas intensities for innovative resources included in NGIA plans in annual status reports, using actual project- or facility-specific data when reasonably feasible.	Frameworks Order, Order Point 2.	All	N/A. No innovative resources were deployed in 2024.
When applicable, utilities shall use the most recent version of the Argonne National Laboratory's Greenhouse Gases, Regulated Emissions, and Energy Use in Technologies (GREET) model in any NGIA plan filings or status reports. Utilities may use the prior year's model if filing an NGIA plan or status report within 30 days of the publication of a new version of the Argonne GREET model.	Frameworks Order, Order Point 3.	Pilots B, C, D, and E, possibly future R&D	N/A. No innovative resources were deployed in 2024.
In annual NGIA status reports, utilities shall provide actual participation and estimated lifetime savings for all energy efficiency measures installed, calculated in accordance with the Technical Reference Manual or other approved methodology.	Frameworks Order, Order Points 15.	Pilots H, J, M, N, P, Q, and R; Weatherization Blitzes, High Performance Commercial New Construction Building Envelope Initiative; Assessing Next-Generation Micro-Carbon Capture for Commercial Buildings, and possibly future R&D	N/A. No innovative resources were deployed in 2024.
In annual NGIA status reports, utilities shall provide actual participation and estimated lifetime savings for all strategic electrification measures installed, calculated in accordance with the Technical Reference Manual or other approved methodology and incorporating any updates to the greenhouse gas intensity of electricity used.	Frameworks Order, Order Point 20.	Pilots I, K, L, M, N, O, Q, R; Weatherization Blitzes; and possibly future R&D	N/A. No innovative resources were deployed in 2024.

Reporting Requirement	Reference	Pilots Affected	Location
Utilities shall update structural cost-benefit values with the filing of each innovation plan or each annual NGIA report filing. Wherever a supporting third-party report or data is used to calculate a structural value, the utility will use the most recent version of that report or data, except that if a new report or data is published within 30 days of an innovation plan filing or annual NGIA status report filing, the utility may use the prior version.	Frameworks Order, Order Point 29.	All	Exhibit G
With each annual NGIA status report, CenterPoint Energy will file an NGIA Tracker showing the differences, if any, between NGIA recovery and expenses and propose adjustments to the Innovation Act Adjustment so as to eliminate the disparity.	NGIA Petition, page 21.	All	NGIA Tracker is provided as Exhibit D; adjustments are proposed in Section XI.
CenterPoint Energy will track and report on residential, commercial/industrial, low-income, tribal, and urban vs. rural participation.	NGIA Petition, page 31.	All	Tables 3-4.
CenterPoint Energy will encourage and support pilot participants' community engagement efforts and will report on these efforts in annual reports.	NGIA Petition, Exhibit D.	Pilots B, E, I, J, K	Section IX
CenterPoint Energy will track and report local co-benefits of RNG projects and any community engagement activities in its annual reports.	NGIA Petition, Exhibit D.	Pilot C	Section IX.2
The Company commits to tracking and reporting on an annual basis the total and percent of Plan spending on vendor services for diverse vendors or suppliers.	NGIA Petition, Exhibit D.	Pilots C, D, F, I, L, M, O, P, Q, R	Table 5
CenterPoint Energy will engage with the City of Mankato to identify and address community questions with the proposed hydrogen blending project. CenterPoint Energy plans to contract services for the design and construction of the electrolyzer and solar panels from Minnesota based businesses, pay prevailing wages, and satisfy IRA apprenticeship requirements. CenterPoint Energy will track and report on these efforts in its annual reports.	NGIA Petition, page 13 and Exhibit D.	Pilot D	Section IX.3
As a proposed buyer of the carbon offsets, the Company will support and participate in any Green Minneapolis' and/or its partner organizations' community engagement efforts, as appropriate, and report on these activities in the Plan's annual reports.	NGIA Petition, Exhibit D, page 22.	Pilot G	Section IX.6

Reporting Requirement	Reference	Pilots Affected	Location
CleanO2 is developing a next generation of its product (version 4.0) that captures a higher proportion of carbon emissions. This product will be field tested in the "Assessing Next Generation Micro-Carbon Capture for Commercial Buildings" research and development ("R&D") project described in Exhibit J. If results of that R&D project are favorable, CarbinX version 4.0 would be eligible for rebates through this pilot. Updated energy savings algorithms would be provided in an annual status report.	NGIA Petition, Exhibit D, page 26.	Pilot H	N/A. CenterPoint Energy has not completed the R&D project; the Company may provide energy savings algorithms in a future annual report
CenterPoint Energy plans to engage a third party to develop and implement a measurement and verification (M&V) plan to analyze system performance in a variety of buildings. CenterPoint Energy may use the results of the M&V to establish a deemed calculated savings algorithm to calculate annual energy savings and carbon reductions in subsequent years of the program. Customers or the program vendor will provide required inputs when applying for an incentive. CenterPoint Energy will propose this methodology in an annual status report prior to implementation.	NGIA Petition, Exhibit D, page 40.	Pilot M	N/A. CenterPoint Energy has not yet launched Pilot M; the Company may propose a methodology in a future annual report
In addition to the opportunity to engage through public meetings during the plan development process, CenterPoint Energy intends to host one or more public meetings during the implementation planning process to gather additional feedback from members of impacted communities, targeted customers, and other interested parties, including feedback on equity and diversity considerations for program implementation. Specifically, CenterPoint Energy will include an assessment and discussion of approaches to address equity and inclusion during the design of Phases 2 and 3, including community outreach and workshops. CenterPoint Energy will target at least 40 percent of residential units served by the pilot qualify as low income, as that term is defined in CIP/ECO, or are located in a disadvantaged community, as that term is defined by the federal government for the Inflation Reduction Act programs. CenterPoint Energy will track and report on these efforts in annual reports.	NGIA Petition, Exhibit D, pages 45-46 and Reply Comments page 25	Pilot N	N/A. CenterPoint Energy has not yet hosted public meetings and Pilot N had no participation in 2024; CenterPoint Energy will discuss equity and inclusion and provide the required participation data in future annual reports

Reporting Requirement	Reference	Pilots Affected	Location
CenterPoint Energy will reevaluate the likelihood of participant tax credits and/or rebates prior to launch of Phase 3 and include updated information in its first annual NGIA status report.	NGIA Petition, Exhibit D, page 45	Pilot N	Section IX.13.
CenterPoint will provide cost and GHG reduction information on a per-contract basis for each RNG facility. For purpose of this metric, costs will be costs incurred by CenterPoint Energy to procure RNG under the contract and other contract-specific costs less savings from avoided natural gas commodity purchases. GHG tons reduced will be estimated lifecycle emissions reductions achieved by RNG purchases made during the year covered by the annual report. Project-specific data may be trade secret in nature.	Coordination with the Department of Commerce	Pilot C	N/A. CenterPoint Energy had no RNG contracts executed by the end of 2024 and had not purchased any RNG
CenterPoint will provide cost and GHG reduction information for each project, as defined by individual participant. For purposes of this metric, costs will be attributable to individual participants (e.g. participant incentives) but may not include pilot costs that are not easily attributed to individual participants. GHG tons reduced will be estimated lifetime emissions reductions achieved by projects undertaken during the year covered by the annual report. Project-specific data may be trade secret in nature.	Coordination with the Department of Commerce	Pilot E Pilot J Pilot K Pilot L	N/A. There were no participants in 2024.
CenterPoint will provide cost and GHG reduction information for projects installed showing a distribution of estimated GHG emission reduction and cost by groups (e.g. X projects fall between Y and Z tons of emissions reduction), where feasible. For purposes of this metric, costs will be CenterPoint Energy incurred expenses attributable to individual participants (e.g. participant incentives) but may not include pilot costs that are not easily attributed to individual participants. Project-specific data may be trade secret in nature.	Coordination with the Department of Commerce	Pilot H	N/A. No projects were completed through Pilot H in 2024.

Reporting Requirement	Reference	Pilots Affected	Location
CenterPoint will provide information on cost, system tonnage, and GHG information for projects installed including a distribution of estimated GHG emission reduction, tonnage, and cost by groups (e.g. X projects fall between Y and Z tons of emissions reduction), where feasible. For purposes of this metric, cost will be CenterPoint Energy incurred expenses attributable to individual participants (e.g. participant incentives) but may not include pilot costs that are not easily attributed to individual participants. Project-specific data may be trade secret in nature.	Coordination with the Department of Commerce	Pilot M	N/A. No projects were completed through Pilot M in 2024.
CenterPoint will provide information on cost and GHG information for each type of measure installed including a distribution of estimated GHG emission reduction and cost by groups (e.g. X measures fall between Y and Z tons of emissions reduction), where feasible. For purposes of this metric, cost will be CenterPoint Energy incurred expenses attributable to individual measures (e.g. participant incentives) but may not include pilot costs that are not easily attributed to individual participants or measures. For purposes of Pilots P and Q, different models of gas heat pumps will be considered different measures. Project-specific data may be trade secret in nature.	Coordination with the Department of Commerce	Pilot O, Pilot P, Pilot Q, Pilot R	N/A. No measures were installed in 2024.
CenterPoint will specify the source of additional power, including any green tariff or power purchase agreement that it will use to procure the power, that it will use for Pilot D in a compliance filing after issuance of final Treasury regulations.	NGIA Plan Order, Order Point 5.	Pilot D	CenterPoint Energy has not yet launched Pilot D and will provide this information in a future filing.

In the Matter of
CenterPoint Energy's Natural Gas Innovation Act (NGIA)
Innovation Plan

Annual Report for Calendar Year 2024

EXHIBIT C: Relevant Information from PGA and AAA Filings

Docket No. G-008/M-23-215

May 30, 2025

CenterPoint Energy is required to include relevant information from monthly purchased gas adjustment ("PGA") filings and annual automatic adjustment ("AAA") filings in its innovation plan annual reports.[1] In future reports, CenterPoint Energy plans to including information from PGA and AAA filings showing information related to renewable natural gas and hydrogen purchased/produced under NGIA. However, there were no purchases of RNG or production of hydrogen in 2024 so there is no relevant information to share from PGA or AAA filings. This Exhibit is being included as a placeholder to help illustrate CenterPoint Energy's plans for the format of annual reports in future years.

[1] *In the Matter of CenterPoint Energy's Natural Gas Innovation Plan*, Docket No. G-008/M-23-215, Order Approving Natural Gas Innovation Plan with Modifications (Oct. 9, 2024), Order Point 28.

In the Matter of
CenterPoint Energy's Natural Gas Innovation Act (NGIA)
Innovation Plan

Annual Report for Calendar Year 2024

EXHIBIT D: NGIA TRACKER AND BALANCE

See Separate Attached Excel Document

Docket No. G-008/M-23-215

May 30, 2025

In the Matter of
CenterPoint Energy's Natural Gas Innovation Act (NGIA)
Innovation Plan

Annual Report for Calendar Year 2024

EXHIBIT E: NGIA TRACKER PROJECTIONS

See Separate Attached Excel Document

Docket No. G-008/M-23-215

May 30, 2025

In the Matter of
CenterPoint Energy's Natural Gas Innovation Act (NGIA)
Innovation Plan

Annual Report for Calendar Year 2024

EXHIBIT F: Public Website Updates

Docket No. G-008/M-23-215

May 30, 2025

Natural Gas Innovation Act (NGIA)

Advancing Minnesota's energy future by implementing a diverse set of innovative pilot projects that aim to reduce greenhouse gas emissions and expand decarbonization efforts for our Minnesota customers.

CenterPoint Energy's first innovation plan was approved in July 2024.

Updates as of Mar 1, 2025

Carbon capture

CenterPoint will work with non-profit Green Cities Accord, formerly Green Minneapolis, to purchase Carbon+ credits that finance tree planting and maintenance in CenterPoint's service territory.

District energy

CenterPoint is working with existing customers to evaluate opportunities for decarbonizing an existing, or installing a new, district energy system using a piping network powered by renewable energy to heat or cool buildings.

Networked geothermal

A request for interest was issued in December 2024 to communities potentially interested in hosting a networked geothermal system, which aims to connect a variety of building types via a shared water loop for heating and cooling. A diversity of urban and rural entities responded from within the area CenterPoint currently serves. CenterPoint will issue a request for proposals to qualified potential vendors for a site selection and feasibility study, to narrow the selection pool to less than five project sites for additional consideration.

Energy efficiency and strategic electrification

CenterPoint is issuing requests for proposals to qualified vendors for multiple programs related to energy efficiency and strategic electrification and has started to enroll customers participating in existing commercial and industrial audit programs into programs expanded via NGIA. These widen the decarbonization opportunities and strategies that were not previously available through the existing programs.

Renewable natural gas (RNG)

CenterPoint is seeking opportunities for regionally-sourced RNG including using Twin Cities metro counties' organic waste and other RNG projects. CenterPoint issued a request for proposals to RNG producers in 2024, and continues to evaluate and work with shortlisted vendors on contract terms.

Green hydrogen (Power-to-hydrogen)

A pilot project for a 1 MW green hydrogen plant to be located at an existing CenterPoint facility in Mankato will include dedicated solar panels, an electrolyzer and equipment for hydrogen storage and blending into the distribution system. A preliminary design process is underway.

Research and development studies

Agricultural Utilization Research Institute is performing a preliminary techno-economic analysis of potential for RNG projects in three selected geographic areas in or near CenterPoint Energy's service territory. CenterPoint has also contracted with a university to support testing of a novel green ammonia production system.

In the Matter of
CenterPoint Energy's Natural Gas Innovation Act (NGIA)
Innovation Plan

Annual Report for Calendar Year 2024

EXHIBIT G: STRUCTURAL VALUES UPDATE

See Separate Attached Excel Document

Docket No. G-008/M-23-215

May 30, 2025

In the Matter of
CenterPoint Energy's Natural Gas Innovation Act (NGIA)
Innovation Plan

Annual Report for Calendar Year 2024

EXHIBIT H: ICF Review of Greenhouse Gas Modeling Approach

Docket No. G-008/M-23-215

May 30, 2025

Assessment of the degree to which CenterPoint's Innovation Plan lifecycle greenhouse gas accounting methodology is consistent with current science

ICF has conducted a review of CenterPoint Energy's greenhouse gas (GHG) accounting methodology and affirms that it aligns with the existing best practices in GHG life cycle assessments (LCAs) and current science. The forthcoming discussion highlights specific considerations CenterPoint Energy intends to incorporate in its reporting, including updates to Argonne National Laboratory's (ANL) Greenhouse gases, Regulated Emissions, and Energy use in Technologies (GREET) model, utility grid mix adjustments to pilots' GHG modeling, the Minnesota Technical Reference Manual (TRM), the City Forest Credit Carbon protocols, and dedicated project-specific analysis for pilots focused on emerging technologies, which all reinforce the robustness and relevance of the methodology. This is the GHG accounting methodology previously proposed in CenterPoint Energy's Innovation Plan, and it is still appropriate considering relevant advancements in science. Nothing has changed substantially scientifically since CenterPoint Energy's Innovation Plan filing that would require material changes to CenterPoint Energy's GHG accounting methodology.

GREET

CenterPoint Energy's GHG accounting methodology leverages the GREET model in several ways. CenterPoint Energy intends to use the model to calculate the GHG intensity of renewable natural gas (RNG) and power-to-hydrogen purchased or produced through the Natural Gas Innovation Act (NGIA)[1] as well as to calculate the baseline GHG intensity of geologic natural gas. In addition, and as discussed further below, certain aspects of the GREET model are used to support portions of GHG accounting for other pilots even where the pilot resource cannot be fully modeled in GREET.

The ANL Research & Development (R&D) GREET Model is updated annually to facilitate evaluations of the energy use and emissions output from energy sector fuels and technologies.[2] The scientists at ANL review U.S. Environmental Protection Agency (EPA), Intergovernmental Panel on Climate Change (IPCC), academic, and other scientific research to ensure GREET reflects the best-available insights on GHGs, fuels, such as renewable natural gas (RNG), and other vehicle/building sector resources. Per the Frameworks Order,[3] CenterPoint Energy will reference the latest available R&D GREET model in its annual GHG accounting and reporting, where feasible, which will keep CenterPoint Energy's work aligned with current science.

GREET models a wide variety of fuel production pathways, including those for conventional fuels, biofuels, hydrogen, and electricity. GREET does not have explicit pathways/prescribed methodologies for each one of CenterPoint Energy's planned pilots, however, it serves as a data library for the emissions accounting for many of the pilots. For example, CenterPoint Energy intends to cite GREET's emissions factors for energy usage/savings for a pilot focused on residential gas heat pumps, even though GREET does not have a heat pump LCA pathway. Another example is CenterPoint Energy's use of global warming potentials (GWPs) for GHGs, which is based on the current GREET model's defaults for all pilots. The Plan filing cited the methane

[1] Minnesota Laws 2021, 1st Special Session, Chapter 4, Article 8, §§ 20, 21 and 27, partially codified at Minn. Stat. §§ 216B.2427-2428.
[2] https://www.energy.gov/eere/rd-greet-life-cycle-assessment-model
[3] *In the Matter of Establishing Frameworks to Compare Lifecycle Greenhouse Gas Emission Intensities of Various Resources, and to Measure Cost Effectiveness of Individual Resources and of Overall Innovation Plans,* Docket No. G-999/CI-21-566, Order Establishing Frameworks for Implementing Minnesota's Natural Gas Innovation Act (June 1, 2022) ("Frameworks Order")

(CH_4) 100-year GWP as 29.8 (via the sixth IPCC Assessment Report, "AR6"[4]) from GREET 2022. The most recent GREET model defaults to the same AR6 GWP value. In the case of the Industrial Methane and Refrigerant Leak Reduction pilot, which aims to stop CH_4 leakage at CenterPoint Energy's largest industrial and commercial customers, CenterPoint Energy leveraged this CH_4 GWP and an assumed leakage rate to estimate the GHG savings in the Plan's pilot proposal.

Intensity of Electricity Use

Per the Frameworks Order, CenterPoint Energy intends to prioritize electric-utility-specific generation information from GREET for the electricity consumed at the RNG facilities it pilots, where possible, and will also use local grid information to model the GHG impact of other pilots that involve electricity use. As mentioned, ANL works to maintain best-available data on the emission factors for different energy generation technologies and fuels in its annual GREET updates. Therefore, when electric utility-specific information is available, CenterPoint Energy will characterize each pilot's applicable grid mix in GREET (in terms of percent of the electricity that is generated from oil, natural gas, coal, nuclear, biomass, and "other"[5]), based on the most recently-approved utility integrated resource plan (IRPs). If utility-specific information is unavailable, CenterPoint Energy will characterize the grid mix for the pilot using the latest-appropriate state-specific generation mix from National Renewable Energy Laboratory (NREL) Standard Scenarios[6]. This will allow CenterPoint Energy's GHG modeling of electricity use to be aligned with best-available emissions data and an industry-standard lifecycle model. The grid mixes used to calculate electricity emissions factors will be updated in CenterPoint Energy's report when pilots estimate savings in future years (based on expected grid mix in future years, e.g., via the utility's IRP).

For example, for the assessments of electricity emissions in pilots using utility electricity in Xcel Energy's service territory, CenterPoint Energy intends to characterize Xcel's grid mix based on their 2024-2040 Upper Midwest IRP, which was approved earlier this year.[7] For electrification measures, the Frameworks Order requires CenterPoint Energy to calculate the GHG intensity assuming a 50/50 blend of utility or regional projected generation mix and zero-carbon resources.[8] This was based on analysis completed by Xcel regarding their expectations for how incremental electric load would be served from 2024-2045. CenterPoint Energy and ICF do not have the data to evaluate whether the 50/50 blend is still reasonable or whether modifications would be warranted.

Energy Efficiency and Electrification Measure Savings

As required by the Frameworks Order, CenterPoint Energy will calculate energy savings in accordance with the Minnesota Technical Reference Manual (TRM) or other methodology approved by the Department of Commerce for the Company's ECO program. Each year, the Minnesota Department of Commerce leads an effort to update the TRM based on the latest available science and other relevant information. This TRM update process will ensure that CenterPoint Energy's savings assumptions remain updated for current science. Where CenterPoint Energy proposes to deviate from the TRM and its ECO program, for example

[4] https://www.ipcc.ch/assessment-report/ar6/
[5] Treated as zero-emission and defined by ANL as electricity generated from hydropower, solar, wind, and geothermal.
[6] Following CenterPoint Energy's Innovation Plan modeling precedent and NGIA Frameworks Order guidance, the Mid-Case, Current Policies Minnesota-specific profile of generation could be pulled for a pilot based in Minnesota whose utility-specific generation mix data is unavailable. The 2024 outlook is now available: Scenario Viewer | Standard Scenarios 2024
[7] *In the Matter of Xcel Energy's 2024-2040 Upper Midwest Integrated Resource Plan,* Docket No. E-002/RP-24-67, Order Approving Settlement Agreement with Modifications (Apr. 21, 2025).
[8] Frameworks Order at Order Point 16.

where a measure is not yet included in the TRM or CenterPoint Energy's ECO program, the Company will file its proposed calculation methodology for approval.

In its Plan filing, CenterPoint Energy proposed one specific method for calculating GHG emissions savings for CarbinX units to be installed through Pilot H. There have been no material changes in science that have caused the proposed methodology, shown in Exhibit D to the Company's Plan filing, to become outdated.

City Forest Credits

As discussed in the Petition, Pilot G uses the City Forest Credit carbon offset protocols to quantify GHG emissions reductions. These protocols are periodically updated to reflect the latest available science.[9] The most recent update was completed in February 22, 2023. Pilot G will continue to use the latest available protocols and will therefore remain up to date with current science.

Project-Specific Information

Where GREET's data is limited and GHG emissions are very project-specific, such as for the modeling of industrial carbon capture and storage (CCS), CenterPoint Energy will dedicate resources towards a project-specific LCA analysis. In this analysis, GWPs and other related scientific factors will still be sourced from GREET to maintain modeling consistency between pilots. Details regarding which projects and measures will be subject to a project-specific analysis can be found in the Petition Exhibits D and W.

Conclusion

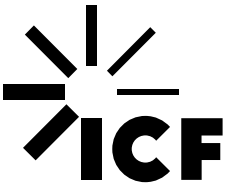
As discussed above, CenterPoint Energy's plans for GHG accounting are consistent with current science. There have not been material relevant changes to scientific understanding or best practices that have caused CenterPoint Energy's GHG accounting plans to have become outdated since the time of Plan filing. The table below provides a snapshot of the resources/ accounting method CenterPoint Energy is relying upon for each pilot to ensure the GHG accounting method remains current. While not noted below, the emissions of geologic natural gas are calculated in accordance with GREET and form part of the calculation for GHG emissions reductions for every pilot.

[9] https://www.cityforestcredits.org/carbon-credits/carbon-protocols/#past-versions

Table 2: Summary of GHG Accounting Resources/Methods to Ensure Consistency with Current Science by Pilot

Pilot	GHG Accounting Resources/Method to Ensure Current Science
RNG Produced from Ramsey & Washington Counties Organic Waste	GREET; electric utility-specific generation mix
Renewable Natural Gas RFP Purchase	GREET; electric utility-specific generation mixes, supplemented by NREL Standard Scenario mid-case state mixes when utility generation mix data is insufficient to inform modeling
Green Hydrogen Blending into Natural Gas Distribution System	GREET
Industrial or Large Commercial Hydrogen and Carbon Capture Incentives	Project-specific LCA analysis using current science at time of analysis
Industrial Methane and Refrigerant Leak Reduction	GREET for lifecycle emissions of methane; facility-specific measurements for savings
Urban Tree Carbon Offsets	City Forest Credit protocols
Carbon Capture Rebates for Commercial Buildings	CenterPoint Energy will continue to monitor for any relevant information warranting updates to its approved deemed savings methodology for CarbinX; facility-specific measurements for savings
New Networked Geothermal Systems	Electric utility-specific generation mixes; measure-specific savings calculations using current science at time of analysis
Decarbonizing Existing District Energy Systems	Will follow methods for measure type; e.g. energy efficiency measures may be calculated in accordance with TRM
New District Energy System	Electric utility-specific generation mixes; measure-specific savings calculations and/or TRM
Industrial Electrification Incentive	Electric utility-specific generation mixes; measure-specific savings calculations using current science at time of analysis
Commercial Hybrid Heating	TRM; electric utility-specific generation mixes, supplemented by NREL Standard Scenario mid-case state mixes when utility generation mix data is insufficient to inform modeling; measure-specific savings calculations
Residential Deep Energy Retrofits and Electric Air Source Heat Pumps	TRM; electric utility-specific generation mixes, supplemented by NREL Standard Scenario mid-case state mixes when utility generation mix data is insufficient to inform modeling; measure-specific savings calculations
Small/Medium Business GHG Audit	Will follow different methods for specific measures; e.g. energy efficiency measures may be calculated in accordance with TRM

Pilot	GHG Accounting Resources/Method to Ensure Current Science
Residential Gas Heat Pumps	Measure-specific savings calculations
Gas Heat Pumps for Commercial Buildings	Measure-specific savings calculations
Industrial and Large Commercial GHG Audit Pilot	Will follow different methods for specific measure types; e.g. energy efficiency measures may be calculated in accordance with TRM

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In the Matter of
CenterPoint Energy's Natural Gas Innovation Act (NGIA)
Innovation Plan

Annual Report for Calendar Year 2024

EXHIBIT I: New Networked Geothermal System Engagement Plan

Docket No. G-008/M-23-215

May 30, 2025

Natural Gas Innovation Act Pilot I: New Networked Geothermal System Engagement Plan DRAFT

Updated: May 2025

INTRODUCTION

This engagement plan (Engagement Plan) provides a framework for community and interested party engagement for the CenterPoint Energy New Networked Geothermal Systems Pilot (Project) being developed under Minnesota's Natural Gas Innovation Act (NGIA). This Engagement Plan is intended to be a living document, updated and revisited regularly based on audience feedback received, and flexibility will be incorporated into the proposed approaches.

In Appendix A of the Engagement Plan, CenterPoint Energy is including a Request for Information (RFI) it issued to potentially interested host communities, a news release related to the RFI and an Email to Customers regarding the RFI.

OVERVIEW

CenterPoint Energy intends to develop a new networked geothermal system to serve current customers within the Company's Minnesota service territory. This Engagement Plan will guide multi-channel communications and engagement touchpoints with targeted audiences to communicate relevant Project information, gather feedback and suggestions from interested and potentially affected parties, proactively address questions and concerns, and educate targeted audiences on the potential Project benefits.

This Plan will guide communications and engagement through all phases of the Project.

GOAL AND OBJECTIVES

Goal: The overarching goal of this Engagement Plan is to facilitate meaningful participation and engagement to aid the Company in shaping the Project for the benefit of participants and customers.

Objectives:

- Aim to create engaging, educational, accessible materials in plain language and in languages other than English (as appropriate).
- Conduct regular touchpoints and updates with interested parties and community members.
- Provide timely, accurate information regarding project developments, structure and progress.
- Collect feedback at strategic times to inform Project development.

- Provide transparency in the decision-making process and create a feedback loop where CenterPoint Energy collects input from targeted audiences, adjusts technical elements, as feasible, and reports back to those audiences.
- Incorporate equity and environmental justice considerations throughout Project development and implementation of the Engagement Plan.
- Educate targeted audiences about the value of the Project.
- Work to identify opportunities for co-creation of Project components.

STRATEGY

CenterPoint Energy aims for the development of the Project to be data-informed and data-driven and will employ community analytics for the Project with the goal of providing maximum benefit to the customers and communities we serve. For this Engagement Plan, distinct audiences will have unique needs and levels of information desired – ranging from high-level, quick snapshots to in-depth information on what the Project could mean to their homes and businesses to detailed discussions around potential Project impacts and what Project development could mean for their communities. **This Engagement Plan will seek to deliver the right messages at the right times to the right audiences.** As a result, the strategy will rely on multi-channel, tailored communications to reach distinct audience types.

The anticipated audience segmentation engagement tracks for communications are shown in **Figure 1**. CenterPoint Energy may adjust these tracks of engagement during Project development. The specific strategies and tactical implementation of engaging with these audiences are expanded upon further later in this Engagement Plan.

Figure 1: Audience engagement tracks

Regulatory Interested Parties Track

The Regulatory Interested Parties Track of communications will be targeted toward audiences that are likely to engage in regulatory processes associated with the Project and assessing CenterPoint Energy's adherence to regulatory and statutory requirements.

In reaching this audience, the overarching focus will be on verifying that CenterPoint Energy's process for completing the networked geothermal project is in line with regulatory and statutory requirements as well as gathering feedback on how CenterPoint Energy can improve different stages of the Project to better meet community expectations and needs.

In **Table 1** below, the potential tactics associated with the Regulatory Interested Parties Track of engagement are listed. Potential tactics for engagement may include any of the following, and these tactics will be adjusted as needed to meet Project needs based on feedback received. Key audiences for the Regulatory Interested Parties track include (but are not limited to) Commission Staff, the Department of Commerce, the Office of the Attorney General, local governments outside of participating communities, nonprofit environmental or consumer advocate organizations, labor unions and other entities that have an interest in engaging throughout Project development.

Table 1. Key Regulatory Interested Parties Track potential tactics

Tactics	Description of Tactics
• Annual reporting	• CenterPoint Energy will release an annual report to the Public Utilities Commission outlining current progress on the Project.
• Workshop(s)	• CenterPoint Energy will host one or more facilitated workshops to discuss the Project and collect feedback.
• Presentations	• CenterPoint Energy will present Project updates to interested parties.
• One-on-one meetings	• CenterPoint Energy will hold one-on-one meetings with interested parties to update on progress and gather feedback.
• Fact sheets	• CenterPoint Energy will create Project-specific fact sheets.
• Informational website	• CenterPoint Energy will maintain an informational website with Project information and updates including links to regulatory filings.
• Email updates	• CenterPoint Energy will send Project email updates on an ongoing basis.

Local Government Unit Track

The Local Government Unit Track of engagement will be targeted toward elected officials and governmental staff of local governmental units in the communities we will potentially be working with during Project development. Different tactics will be employed at various stages throughout the project.

In reaching these proposed local government units, CenterPoint Energy will focus on understanding and developing a Project in alignment with community needs and gaining more awareness about potential barriers to participation.

In **Table 2** below, the potential tactics associated with the Local Government Unit Track are listed. Potential tactics for engagement may include any of the following, and these tactics may be adjusted as needed to meet Project and audience needs. Key audiences for the Local Government Unit Track include (but are not limited to) elected officials, township boards, regional governments, county governments and city/township/county staff.

Table 2. Key Local Government Unit Track potential tactics matrix

Tactics	Description of Tactics
• Fact sheets	• CenterPoint Energy will create Project-specific fact sheets.
• Email updates	• CenterPoint Energy will send Project email updates on an ongoing basis.
• Presentations	• CenterPoint Energy will present Project updates
• One-on-one meetings	• One-on-one meetings will be held with local government officials to gather feedback.
• On-site engagement	• CenterPoint Energy will conduct site visits to gain in-field data and input from these public officials.
• Informational website	• CenterPoint Energy will maintain an informational website with Project information and updates including links to regulatory filings.

Initial Community Engagement Track

The Initial Community Engagement Track will target communications efforts toward the potential customers and neighborhood(s) that could host the Project.

In reaching these audiences, the aim will be to engage with potential customers early and regularly throughout Project development with a focus on encouraging and welcoming both feedback and meaningful public participation. CenterPoint Energy will aim to engage potential participant customers and host neighborhoods so that they understand the Project's proposed technologies and the value it could potentially bring to their community. Through these

engagement tactics, CenterPoint Energy will aim to foster interest and promote Project education with potential participant customers and host neighborhoods, gather technical information and provide multiple opportunities for potential participant customers and host neighborhoods to ask questions.

Because networked geothermal is a new technology for potentially impacted customers, CenterPoint Energy will work to educate potential participant customers and host neighborhoods on the value, safety and reliability of the Project. With new technologies, CenterPoint Energy knows that empathetic, informative and authentic interest in customers' concerns will need to be centered through implementation of the Engagement Plan.

In **Table 3** below, the potential tactics associated with the Community Engagement Track of communications are listed. Potential tactics for engagement can include any of the following, and these tactics will be adjusted as needed to meet Project needs based on feedback we receive. Key audiences for the Community Engagement Track include potential participant customers and neighborhoods.

Table 3. Initial Community Engagement Track potential tactics matrix.

Tactics	Description of Tactics
• Fact sheets	• CenterPoint Energy will create Project-specific fact sheets.
• Resource Guides	• CenterPoint Energy will develop resource guides to provide more information on what participation in this Project would look like at both a community and individual level.
• Informational website	• CenterPoint Energy will maintain an informational website with Project information and updates including links to regulatory filings.
• In-person public meetings	• CenterPoint Energy will host in-person Project public meetings.
• Virtual public meetings	• CenterPoint Energy will host live and on-demand virtual public meetings.
• Community events attendance	• CenterPoint Energy will attend community events in targeted communities such as farmers markets, community celebrations and other events.
• Community Programs Storytelling	• CenterPoint Energy will seek to engage in existing community programs that target audiences interested in learning about this Project and to highlight the potential benefits of this technology and key learnings.
• One-on-one meetings	• One-on-one meetings will be held with community members to gather feedback.
• Direct mail	• Postcards, letters and mailers to provide project updates.
• Email updates	• CenterPoint Energy will send Project email updates on an ongoing basis.

• Presentations	• CenterPoint Energy will present Project updates to community and neighborhood organizations.
• Expressions of interest	• CenterPoint Energy will encourage customers to sign letters of interest or use other "opt-in" tools to indicate preferences for participation in the Project.

General Public Awareness Track

The General Public Awareness Track will work to provide updates and relevant Project information to the general public with a focus on education and general awareness.

In **Table 4** below, the potential tactics associated with the General Public Awareness Track of communications are identified. Potential tactics for engagement can include any of the following, and these tactics will be adjusted as needed to meet Project development needs.

Key audiences for the General Public Awareness Track include (but are not limited to) other CenterPoint Energy customers around the state, people with a general interest in networked geothermal, Minnesotans generally, renewable energy technology businesses, other utilities currently developing or planning to develop networked geothermal systems, and regulators and local governmental units in other states that are interested in the potential of networked geothermal systems.

Table 4. Key General Public Awareness Track potential tactics matrix.

Tactics	Description of Tactics
• Informational website	• CenterPoint Energy will maintain an informational website with Project information, key regulatory filings and updates.
• Resource Guides	• CenterPoint Energy will develop resources to provide more information on what participation in this Project looks like at both a community and individual level.
• Fact sheets	• CenterPoint Energy will create Project-specific fact sheets.
• Presentations at local, regional and national conferences and industry other events	• CenterPoint Energy will prepare presentations related to the Project.
• Community Programs Storytelling	• CenterPoint Energy will seek to engage in existing community programs to engage audiences interested in learning about this Project and to highlight the potential benefits of this technology and key learnings.

• Media outreach	• CenterPoint Energy will conduct media outreach to highlight Project milestones and updates.
• Social media	• CenterPoint Energy will use social media to highlight Project milestones and updates.

ANTICIPATED ENGAGEMENT SCHEDULE

As the Engagement Plan progresses, the schedule shown below may need to be adjusted to reflect shifting Project needs and to incorporate feedback received. This schedule outlines expected campaign efforts in 2024 and 2025 and will continue to be built out throughout Project development.

2024

Q4

- General interest Request for Information (RFI) distributed to cities, counties and townships
- Email distributed to communities served by CenterPoint Energy
- News release
- Initial communications to potential host neighborhoods and associated local governments
- Pilot project infographic

2025

Q1

- Updates to all interested parties
- Presentations to interested parties

Q2

- Updates to all interested parties
- Presentations to interested parties
- Identify communications tactics to support technical work

Q3

- Updates to all interested parties
- Presentations to interested parties

Q4

- Regulatory interested parties workshop
- Updates to all interested parties
- Presentations to interested parties

These activities are subject to change.

Engagement Loop

Meaningful participation will be critical to informing Project development. This Engagement Plan will implement a feedback loop in which audiences are identified, information is provided to audiences, feedback is received from audiences and findings are reported back to the project team. This process is identified in Figure 2.

Figure 2: Anticipated Engagement Process

Communications to Date

In conducting initial engagement to targeted audiences, CenterPoint Energy developed several tactics which are identified in Appendix A.

CenterPoint Energy has received key observations from local units of government based on the RFI issued to the communities CenterPoint Energy serves. Key themes are captured in Table 5 below.

Table 4. Themes from Engagement to Date

Theme	Observation
Interests from All Types of Minnesota Communities	• Wide variety of community sizes are interested in the Project. • Urban, suburban, rural and Native communities all indicated interest in participating and being engaged.

Sustainability and Decarbonization Goals	• The vast majority of interested communities have sustainability and decarbonization targets or plans to develop them.
Interest in Funding for Geothermal	• Most interested communities are looking into external funding sources to support geothermal project development.
Site Proposals	• Approximately one third of interested communities have already considered potential locations for networked geothermal projects.

Plan Measurement

This Plan will be measured using both qualitative and quantitative metrics. Adjustments to this Plan will be made based on the evaluation and analysis of metrics and feedback received from audiences. Meaningful participation will help influence the Project development and will be evaluated and incorporated, as appropriate, into the Project. Throughout all Project stages, feedback from targeted audiences will be critical to the Project development.

Quantitative Metrics

Quantitative metrics help evaluate this Engagement Plan. Specific metrics that will be tracked include, but are not limited to:

- Website analytics
- Amount of collateral printed and distributed
- Number of in-person and virtual meetings
- Number of presentations

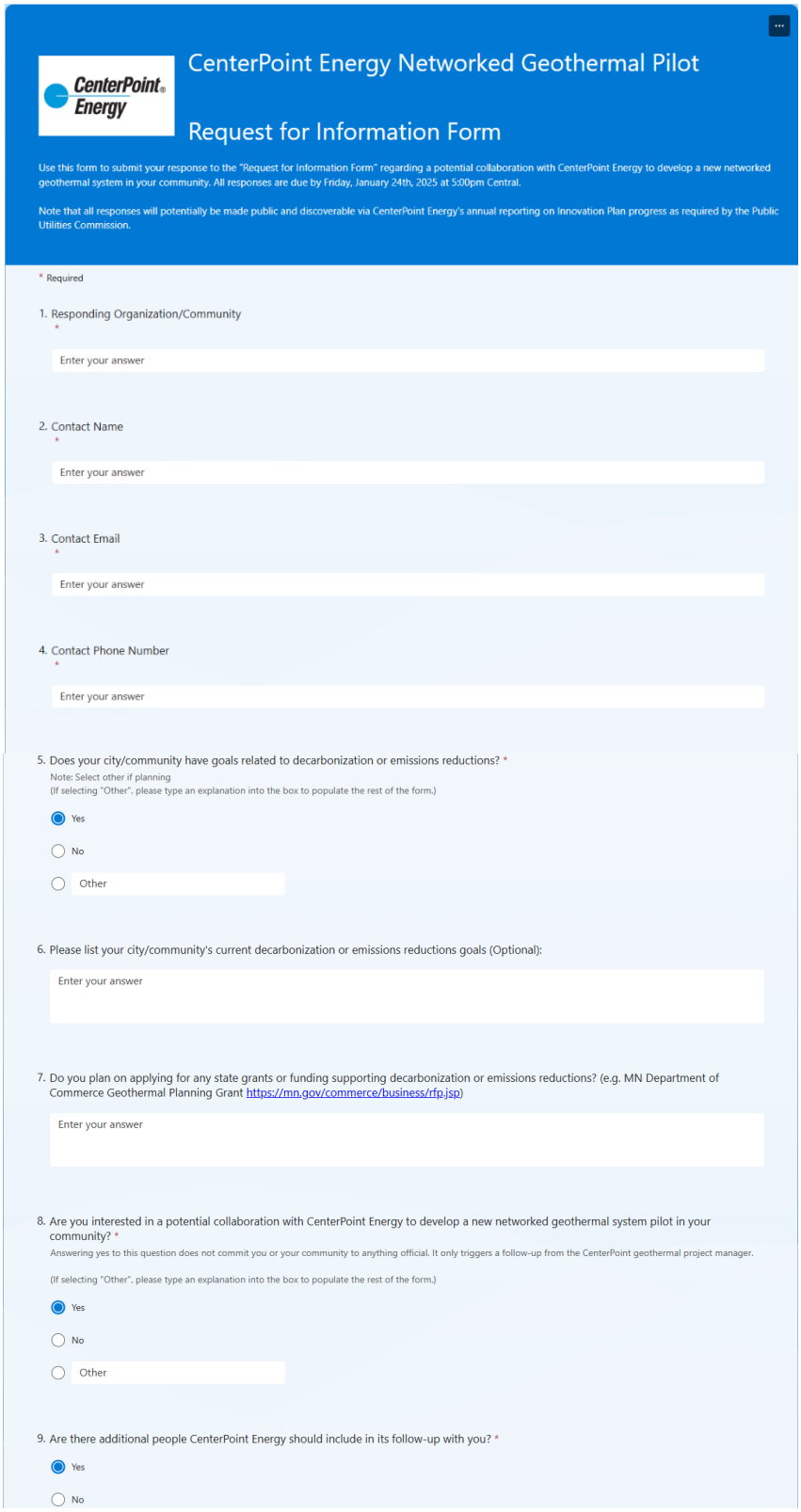
Qualitative Metrics

Qualitative metrics help evaluate this Engagement Plan by assessing the quality of interactions and information. Specific metrics that will be used include, but are not limited to:

- Written feedback
- Verbal feedback

APPENDIX A – 2024 Communications

1. RFI



CenterPoint Energy Networked Geothermal Pilot

Request for Information Form

Use this form to submit your response to the "Request for Information Form" regarding a potential collaboration with CenterPoint Energy to develop a new networked geothermal system in your community. All responses are due by Friday, January 24th, 2025 at 5:00pm Central.

Note that all responses will potentially be made public and discoverable via CenterPoint Energy's annual reporting on Innovation Plan progress as required by the Public Utilities Commission.

* Required

1. Responding Organization/Community *
Enter your answer

2. Contact Name *
Enter your answer

3. Contact Email *
Enter your answer

4. Contact Phone Number *
Enter your answer

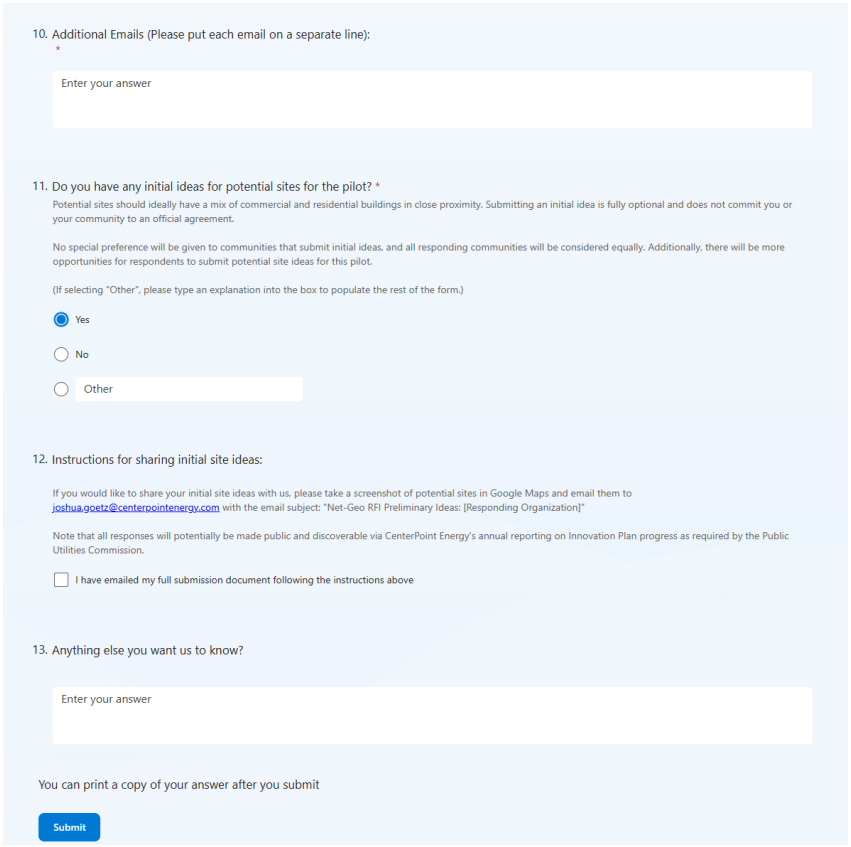
5. Does your city/community have goals related to decarbonization or emissions reductions? *
Note: Select other if planning
(If selecting "Other", please type an explanation into the box to populate the rest of the form.)
- Yes
- No
- Other

6. Please list your city/community's current decarbonization or emissions reductions goals (Optional):
Enter your answer

7. Do you plan on applying for any state grants or funding supporting decarbonization or emissions reductions? (e.g. MN Department of Commerce Geothermal Planning Grant https://mn.gov/commerce/business/rfp.jsp)
Enter your answer

8. Are you interested in a potential collaboration with CenterPoint Energy to develop a new networked geothermal system pilot in your community? *
Answering yes to this question does not commit you or your community to anything official. It only triggers a follow-up from the CenterPoint geothermal project manager.
(If selecting "Other", please type an explanation into the box to populate the rest of the form.)
- Yes
- No
- Other

9. Are there additional people CenterPoint Energy should include in its follow-up with you? *
- Yes
- No



10. Additional Emails (Please put each email on a separate line):
*

Enter your answer

11. Do you have any initial ideas for potential sites for the pilot? *

Potential sites should ideally have a mix of commercial and residential buildings in close proximity. Submitting an initial idea is fully optional and does not commit you or your community to an official agreement.

No special preference will be given to communities that submit initial ideas, and all responding communities will be considered equally. Additionally, there will be more opportunities for respondents to submit potential site ideas for this pilot.

(If selecting "Other", please type an explanation into the box to populate the rest of the form.)

- (●) Yes
- ( ) No
- ( ) Other

12. Instructions for sharing initial site ideas:

If you would like to share your initial site ideas with us, please take a screenshot of potential sites in Google Maps and email them to joshua.goetz@centerpointenergy.com with the email subject: "Net-Geo RFI Preliminary Ideas: [Responding Organization]"

Note that all responses will potentially be made public and discoverable via CenterPoint Energy's annual reporting on Innovation Plan progress as required by the Public Utilities Commission.

- [ ] I have emailed my full submission document following the instructions above

13. Anything else you want us to know?

Enter your answer

You can print a copy of your answer after you submit

Submit

2. News Release

CenterPoint Energy

Sign In / Register

Share

CenterPoint Energy launches request for information to team with a local government on a networked geothermal pilot project to help advance Minnesota's decarbonization efforts

Pilot project expected to help reduce greenhouse gas emissions and demonstrate value of networked geothermal technology in a cold climate

Thursday-December-19-2024

Minneapolis – Dec. 19, 2024 – Today, CenterPoint Energy, Minnesota's largest natural gas utility, issued a Request for Information (RFI) to the local governmental entities it serves in Minnesota to garner interest in collaborating with the company on a new networked geothermal pilot project. Interested cities and townships that are currently served by CenterPoint are invited to submit responses to the RFI by Friday, Jan. 24, 2025.

A networked geothermal system provides heating and cooling to multiple buildings connected by underground water pipes, electric heat pumps and the relatively constant temperature of the earth. This system pulls warmth into buildings in colder temperatures and provides cooling by pumping heat into the ground during warmer weather. An ideal location would include a mix of building types including residential, commercial and community facilities.

This project is part of a five-year innovation plan submitted under Minnesota's Natural Gas Innovation Act (NGIA). Passed with bipartisan support in 2021, the NGIA created a new regulatory framework for natural gas utilities to invest in renewable energy resources and innovative technologies to help reduce Minnesota's greenhouse gas (GHG) emissions.

"CenterPoint looks forward to identifying a local government to team with in developing this new networked geothermal system to understand how this technology could help with decarbonization efforts in a cold climate state like Minnesota," said Brad Steber, CenterPoint Energy's Vice President, Minnesota Gas. "We're excited to work with our regulators, stakeholders and customers to continue identifying innovative technologies that show promise in helping to reduce emissions. We remain committed to advancing Minnesota's energy future, while maintaining safe, reliable and resilient energy service for the benefit of the customers and communities we're privileged to serve."

In 2025, CenterPoint will continue to develop this project, including conducting technical studies for siting and engineering, prior to starting construction. Throughout the development of this pilot, CenterPoint will conduct regular engagement with regulators, stakeholders and customers to keep them informed of progress.

Beyond the networked geothermal project the company will own, CenterPoint will offer incentives for large customers to partially offset costs to install and operate their own networked geothermal system and will also seek opportunities to identify decarbonization strategies for an existing district energy system in one of the communities the company serves.

NGIA
The Minnesota Public Utilities Commission approved CenterPoint's innovation plan in July 2024. The approved plan includes 17 pilot projects and seven research and development projects, including investments in made-in-Minnesota low- and zero-carbon gases like renewable natural gas and green hydrogen as well as innovative efforts such as onsite carbon capture and hybrid heating.

CenterPoint's innovation plan is expected to deliver significant benefits to Minnesota, including:

- **Reducing or avoiding an estimated 1.1 million tons of carbon emissions** over the lifetime of the projects – equivalent to the annual energy use of approximately 150,000 homes.
- **Creating an estimated 3,000 full-time equivalent jobs** over the pilot projects' lifetimes.
- **Leveraging an estimated approximately $17 million or more** in federal clean energy incentives (as applicable).

CenterPoint is committed to reducing GHG emissions, as demonstrated by its company-wide Net Zero goals by 2035 for its Scope 1 and certain Scope 2 GHG emissions. Also, CenterPoint is committed to helping **residential and business customers reduce GHG emissions attributable to their end use of natural gas by 20-30% by 2035 (from a 2021 baseline).** The total GHG emission reductions under this Scope 3 goal are comparable to those for the company's combined Scope 1 and certain Scope 2 Net Zero goals.

To learn more about CenterPoint's efforts to advance Minnesota's energy future, visit CenterPointEnergy.com/FutureMN.

About CenterPoint Energy, Inc.
As the only investor-owned electric and gas utility based in Texas, CenterPoint Energy, Inc. (NYSE: CNP) is an energy delivery company with electric transmission and distribution, power generation and natural gas distribution operations that serve more than 7 million metered customers in Indiana, Louisiana, Minnesota, Mississippi, Ohio and Texas. With approximately 9,000 employees, CenterPoint Energy and its predecessor companies have been in business for more than 150 years. For more information, visit CenterPointEnergy.com.

Forward Looking Statement:
This news release includes forward-looking statements within the meaning of the Private Securities Litigation Reform Act of 1995. When used in this news release, the words "anticipate," "believe," "continue," "could," "estimate," "expect," "forecast," "goal," "intend," "may," "objective," "plan," "potential," "predict," "projection," "should," "target," "will" or other similar words are intended to identify forward-looking statements. These forward-looking statements are based

upon assumptions of management which are believed to be reasonable at the time made and are subject to significant risks and uncertainties. Actual events and results may differ materially from those expressed or implied by these forward-looking statements. Any statements in this news release regarding future events, such as CenterPoint Energy's ability to execute on the networked geothermal pilot project, including the planned scope of the project, anticipated benefits, the associated extent of GHG emissions reductions, and associated collaboration and communication with stakeholders, CenterPoint Energy's ability to execute on the innovation plan, including the planned scope of projects and anticipated benefits, and the associated extent of GHG emission reductions, advancement of decarbonization efforts and the number of jobs created by the innovation plan, the extent to which and timing of CenterPoint Energy's ability to recover costs to implement the innovation plan, the amount and expected impact to customers' costs and any other statements that are not historical facts are forward-looking statements. Each forward-looking statement contained in this news release speaks only as of the date of this release.

Important factors that could cause actual results to differ materially from those indicated by the provided forward-looking information include, but are not limited to, risks and uncertainties relating to: (1) CenterPoint Energy's business strategies and strategic initiatives; (2) changes in market demand; (3) CenterPoint Energy's ability to fund and invest planned capital and the timely recovery of CenterPoint Energy's investments; (4) financial market conditions; (5) general economic and political conditions; (6) the timing and impact of regulatory proceedings and actions and legal proceedings; (7) effects of competition; (8) catastrophic events including public health threats; (9) weather variations and the impact of climate change; (10) changes in business plans; (11) continued disruptions to the global supply chain including volatility in commodity prices; (12) changes in technology; (13) legislative actions, including tax and developments related to the environment such as global climate change, air emissions, GHG emissions, waste water discharges and the handling of coal combustion residuals; (14) CenterPoint Energy's ability to execute on its initiatives, targets and goals and operations and maintenance goals and (15) other factors discussed CenterPoint Energy's Annual Report on Form 10-K for the fiscal year ended December 31, 2023 and CenterPoint Energy's Quarterly Report on Form 10-Q for the quarters ended March 31, 2024, June 30, 2024, and September 30, 2024, including in the “Risk Factors" and “Cautionary Statement Regarding Forward-Looking Information" sections of such reports, and other reports CenterPoint Energy or its subsidiaries may file from time to time with the Securities and Exchange Commission.

Net Zero Disclaimer
CenterPoint Energy's **Scope 1 GHG emissions** estimates are calculated from GHG emissions that directly come from its operations. CenterPoint Energy's **Scope 2 GHG emissions** estimates are calculated from emissions that indirectly come from its energy usage, but because Texas is in an unregulated market, its Scope 2 GHG emissions estimates do not take into account Texas electric transmission and distribution assets in the line loss calculation and exclude emissions related to purchased power between 2024E-2026E. CenterPoint Energy's **Scope 3 GHG emissions** estimates are based on the total natural gas supply delivered to residential and commercial customers as reported in the U.S. Energy Information Administration (EIA) Form EIA-176 reports and do not take into account the GHG emissions of transport customers and GHG emissions related to upstream extraction. While CenterPoint Energy believes that it has a clear path towards achieving its Net Zero GHG emissions (Scope 1 and certain Scope 2) by 2035 goals, its analysis and path forward required it to make a number of assumptions. These goals and underlying assumptions involve risks and uncertainties and are not guarantees. Should one

or more of CenterPoint Energy's underlying assumptions require updating, CenterPoint Energy's actual results and ability to achieve Net Zero Scope 1 and certain Scope 2 GHG emissions by 2035 could differ materially from its expectations. Certain of the assumptions that could impact CenterPoint Energy's ability to meet its Net Zero Scope 1 and certain Scope 2 GHG emissions goals include, but are not limited to: GHG emission levels; service territory size and capacity needs remaining in line with company expectations (inclusive of changes related to the announced sale of CenterPoint Energy's Louisiana and Mississippi local distribution company businesses); regulatory approval of Indiana Electric's generation transition plan; impacts of future environmental regulations or legislation; impacts of future carbon pricing regulation or legislation, including a future carbon tax; price, availability and regulation of carbon offsets; price of fuel, such as natural gas; cost of energy generation technologies, such as wind and solar, natural gas and storage solutions; adoption of alternative energy by the public, including adoption of electric vehicles; rate of technology innovation with regards to alternative energy resources; CenterPoint Energy's ability to implement its modernization plans for its pipelines and facilities; CenterPoint Energy's ability to complete and timely implement generation alternatives, such as solar and wind generation, to Indiana Electric's coal generation and retirement dates of Indiana Electric's coal facilities by 2035; CenterPoint Energy's ability to construct and/or permit new natural gas pipelines; CenterPoint Energy's ability to procure resources needed to build at a reasonable cost, the lack of or scarcity of resources and labor, the lack of any project cancellations, construction delays or overruns and CenterPoint Energy's ability to appropriately estimate costs of new generation; impact of any supply chain disruptions; changes in applicable standards, metrics, methodologies or frameworks; and enhancement of energy efficiencies.

3. Email to Communities

Greetings,

CenterPoint Energy received approval from the Minnesota Public Utilities Commission (PUC) to proceed with our first Innovation Plan under the state's Natural Gas Innovation Act. CenterPoint's plan aims to reduce emissions and advance innovation for Minnesota's cleaner energy future. As part of this plan, CenterPoint will develop a **new networked geothermal (net-geo) pilot project** located in a community that we currently serve.

As an initial step, CenterPoint is issuing this **Request for Information (RFI)** to communities we serve to gauge your interest in collaborating with us to develop this net-geo pilot. **Your community has been identified as a potentially interested party, and we want to establish a line of communication with you for this pilot.**

How does a networked geothermal system work?
Using the relatively constant temperature of the earth, this new networked geothermal pilot will provide heating and cooling for multiple buildings in a system connected by underground water pipes and electric heat pumps. This system will pull warmth into buildings in colder temperatures and provide cooling by pumping heat into the ground during warmer weather. Through this pilot, CenterPoint seeks to gain operational experience with networked geothermal and better understand how this technology can aid decarbonization efforts in a cold climate while maintaining safe, reliable energy service for our customers.

Next Steps
If your community is interested in engaging with us on this project, **please fill out the CenterPoint Energy Net-Geo Interest Form at this link https://forms.office.com/r/QEjUS9w68Y by Jan. 24, 2025.** The form also provides instructions for suggesting a high-level pilot site idea, though this is entirely optional, and CenterPoint will provide more opportunities for suggesting sites (Note: No preferential treatment will be given to respondents that suggest site ideas).

An ideal location would include a mix of building and customer types such as residential, commercial and community facilities to maximize the efficiency of the net-geo systems as well as our understanding of potential future applications in Minnesota.

We welcome suggestions for additional local government units who may have interest in responding to this RFI. If you have someone in mind who may be interested, please forward this email and copy Joshua.goetz@centerpointenergy.com.
Respondents can expect a follow-up from CenterPoint within a few weeks of submitting their responses.

Deadline for RFI Responses
Friday, January 24, 2025 at 5:00 PM Central Time.

Response Confidentiality
Responses, including online submissions and email correspondence, will potentially be made public by CenterPoint through its Innovation Plan's annual reporting as required by the Minnesota Public Utilities Commission.

Questions?
Please reach out to Joshua.goetz@centerpointenergy.com.

We are excited to work with communities like yours to develop this pilot project and learn more about how networked geothermal energy can reduce emissions and serve our communities in Minnesota.

Thank you,

Josh Goetz

Disclaimer
This RFI is issued solely for information and planning purposes and does not constitute a binding agreement between CenterPoint Energy and any responding parties. Responding to this RFI does not commit the responding party to collaborating with CenterPoint Energy on this pilot, nor does it guarantee that CenterPoint Energy will build this pilot in your community. Responding to this form indicates to CenterPoint that your community is interested in having a conversation about collaborating on this pilot.

Josh Goetz (he/him/his)
Senior Project Manager, Decarbonization Projects
CenterPoint Energy | Minnesota Gas
612.321.4473 w | 612-322-2743 c
CenterPointEnergy.com

In the Matter of
CenterPoint Energy's Natural Gas Innovation Act (NGIA)
Innovation Plan

Annual Report for Calendar Year 2024

EXHIBIT J: Proposed Revised Tariff Page

Docket No. G-008/M-23-215

May 30, 2025

CenterPoint Energy

Section V
Second Revised Page 30
Replacing Original Page 30

NATURAL GAS INNOVATION ACT (NGIA) ADJUSTMENT RIDER

Applicability:
Applicable to bills for gas and transportation service provided under the Company's retail rate schedules according to customer class, as shown below.

Exemptions are as follows:
"Large Customer Facility" customers that have been exempted from the Company's Conservation Improvement Program charges pursuant to Minn. Stat. 216B.241, subd. 1a (b) shall receive a monthly exemption from NGIA charges unless they have filed a request with the Minnesota Department of Commerce to be included in the Company's NGIA innovation plan, pursuant to Minn. Stat. 216B.2427, subd. 3(f). Such monthly exemption will be effective beginning January 1 of the year following the grant of exemption. Upon exemption from the NGIA charges, the "Large Customer Facility" customers can no longer participate in CenterPoint Energy's NGIA innovation plan pilot programs.

Rates:

Rate Class	Base Charge Per Therm (IAC)	Adjustment Per Therm (IAA)
Residential	$0.00360~~0.00000~~	$0.00636~~0.00000~~
Comm Firm A	$0.00618~~0.00000~~	$0.00998~~0.00000~~
Comm/Ind Firm B	$0.00618~~0.00000~~	$0.00998~~0.00000~~
Comm/Ind Firm C - Sales Service	$0.00618~~0.00000~~	$0.00998~~0.00000~~
Comm/Ind Firm C - Transport	$0.00618~~0.00000~~	$0.00998~~0.00000~~
Large General Firm Sales Service	$0.00618~~0.00000~~	$0.00998~~0.00000~~
Large Firm Transport	$0.00618~~0.00000~~	$0.00998~~0.00000~~
Small Dual Fuel A - Sales Service	$0.00618~~0.00000~~	$0.00998~~0.00000~~
Small Dual Fuel A - Transport	$0.00618~~0.00000~~	$0.00998~~0.00000~~
Small Dual Fuel B - Sales Service	$0.00618~~0.00000~~	$0.00998~~0.00000~~
Small Dual Fuel B - Transport	$0.00618~~0.00000~~	$0.00998~~0.00000~~
Large Volume - Dual Fuel Sales Service	$0.00618~~0.00000~~	$0.00998~~0.00000~~
Large Volume - Dual Fuel Transport	$0.00618~~0.00000~~	$0.00998~~0.00000~~
Large Volume-Transport-MR	$0.00618~~0.00000~~	$0.00998~~0.00000~~
Large Volume-Dual Fuel Sales Service-MR	$0.00618~~0.00000~~	$0.00998~~0.00000~~
Large Volume - Dual Fuel Transport-MR	$0.00618~~0.00000~~	$0.00998~~0.00000~~
Interruptible Agricultural Grain Dryer Sales Service	$0.00618~~0.00000~~	$0.00998~~0.00000~~
Backup Generator Firm Sales Service	$0.00618~~0.00000~~	$0.00998~~0.00000~~

CenterPoint Energy

NATURAL GAS INNOVATION ACT (NGIA) ADJUSTMENT RIDER

Applicability:
Applicable to bills for gas and transportation service provided under the Company's retail rate schedules according to customer class, as shown below.

Exemptions are as follows:
"Large Customer Facility" customers that have been exempted from the Company's Conservation Improvement Program charges pursuant to Minn. Stat. 216B.241, subd. 1a (b) shall receive a monthly exemption from NGIA charges unless they have filed a request with the Minnesota Department of Commerce to be included in the Company's NGIA innovation plan, pursuant to Minn. Stat. 216B.2427, subd. 3(f). Such monthly exemption will be effective beginning January 1 of the year following the grant of exemption. Upon exemption from the NGIA charges, the "Large Customer Facility" customers can no longer participate in CenterPoint Energy's NGIA innovation plan pilot programs.

Rates:

Rate Class	Base Charge Per Therm (IAC)	Adjustment Per Therm (IAA)
Residential	$0.00360	$0.00636
Comm Firm A	$0.00618	$0.00998
Comm/Ind Firm B	$0.00618	$0.00998
Comm/Ind Firm C - Sales Service	$0.00618	$0.00998
Comm/Ind Firm C - Transport	$0.00618	$0.00998
Large General Firm Sales Service	$0.00618	$0.00998
Large Firm Transport	$0.00618	$0.00998
Small Dual Fuel A - Sales Service	$0.00618	$0.00998
Small Dual Fuel A - Transport	$0.00618	$0.00998
Small Dual Fuel B - Sales Service	$0.00618	$0.00998
Small Dual Fuel B - Transport	$0.00618	$0.00998
Large Volume - Dual Fuel Sales Service	$0.00618	$0.00998
Large Volume - Dual Fuel Transport	$0.00618	$0.00998
Large Volume-Transport-MR	$0.00618	$0.00998
Large Volume-Dual Fuel Sales Service-MR	$0.00618	$0.00998
Large Volume - Dual Fuel Transport-MR	$0.00618	$0.00998
Interruptible Agricultural Grain Dryer Sales Service	$0.00618	$0.00998
Backup Generator Firm Sales Service	$0.00618	$0.00998

In the Matter of
CenterPoint Energy's Natural Gas Innovation Act (NGIA)
Innovation Plan

Annual Report for Calendar Year 2024

EXHIBIT K: WORKFORCE DEVELOPMENT ACTIVITIES

See Separate Attached Excel Document

Docket No. G-008/M-23-215

May 30, 2025

CERTIFICATE OF SERVICE

I, Christina Benning, certify that on Friday, May 30, 2025, I served the attached Annual Report of CenterPoint Energy on the attached service list for Docket No. G-008/M-23-215. The filing was delivered electronically or, if indicated on the attached service list, placed in the U.S. Mail at Minneapolis, Minnesota.

/s/ Christina Benning
Senior Regulatory Paralegal
CenterPoint Energy

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4	Abby	Alter	aalter@rmi.org			2490 Junction Place Ste 200 Boulder CO, 80301 United States	Electronic Service		No	23-215Official
5	Gary	Ambach	gambach@slipstreaminc.org	Slipstream, Inc.		8973 SW Village Loop Chanhassen MN, 55317 United States	Electronic Service		No	23-215Official
6	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-215Official
7	Susan	Arntz	sarntz@mankatomn.gov	City Of Mankato		P.O. Box 3368 Mankato MN, 56002-3368 United States	Electronic Service		No	23-215Official
8	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
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10	Jessica L	Bayles	jessica.bayles@stoel.com	Stoel Rives LLP		1150 18th St NW Ste 325 Washington DC, 20036 United States	Electronic Service		No	23-215Official
11	Laura	Beaton	beaton@smwlaw.com	Shute, Mihaly & Weinberger LLP		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	23-215Official
12	Randall	Beck	rbeck3@wm.com	Waste Management Renewable Energy, L.L.C.		1021 Main St Houston TX, 77002 United States	Electronic Service		No	23-215Official
13	David	Bender	dbender@earthjustice.org	Earthjustice		1001 G Street NW Suite 1000 Washington DC, 20001 United States	Electronic Service		No	23-215Official
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#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
16	James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
17	Sherri	Billimoria	sbillimoria@rmi.org	Rocky Mountain Institute (RMI)		null null, null United States	Electronic Service		No	23-215Official
18	Mike	Boughner	michael.l.boughner@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
19	Tim	Brinkman	tim.brinkman@gvtel.com	Garden Valley Telephone Company d/b/a Garden Valley Technologies		206 Vance Ave S PO Box 259 Erskine MN, 56535 United States	Electronic Service		No	23-215Official
20	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	23-215Official
21	Roderick	Cameron	roderick.cameron@ftr.com	Frontier Communications of Minnesota, Inc.		180 South Clinton Avenue Rochester NY, 14646 United States	Electronic Service		No	23-215Official
22	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	23-215Official
23	Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy		10 2nd St NE Ste. 400 Minneapolis MN, 55413 United States	Electronic Service		No	23-215Official
24	Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
25	Margaret	Cherne-Hendrick	cherne-hendrick@fresh-energy.org			Fresh Energy 408 Saint Peter Street, Suite 220 St. Paul MN, 55102 United States	Electronic Service		No	23-215Official
26	Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-215Official
27	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	23-215Official
28	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO, 63119-2044 United States	Electronic Service		No	23-215Official
29	Sheri	Comer	sheri.comer@ftr.com	Frontier Communications Corporation		1500 MacCorkle Ave SE Charleston WV, 25396 United States	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
30	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	23-215Official
31	Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350		729 6th St E St. Paul MN, 55106 United States	Electronic Service		No	23-215Official
32	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	23-215Official
33	Joseph	Dammel	dammel@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 St. Paul MN, 55102 United States	Electronic Service		No	23-215Official
34	Seth	DeMerritt	seth.demerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
35	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
36	Ryan	Dougherty	ryan@geoexchange.org	Geothermal Exchange Organization		312 S 4th St Ste 100 SPRINGFIELD IL, 62701 United States	Electronic Service		No	23-215Official
37	J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy		408 St Peter St Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	23-215Official
38	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	23-215Official
39	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	23-215Official
40	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	23-215Official
41	Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International		5600 N Highway 169 Minneapolis MN, 55428-3096 United States	Electronic Service		No	23-215Official
42	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	23-215Official
43	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	23-215Official
44	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN,	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55102 United States				
45	Debbie	Goettel	debbie.goettel@hennepin.us	Partnership on Waste and Energy		2785 White Bear Ave N Ste 350 Maplewood MN, 55109 United States	Electronic Service		No	23-215Official
46	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	23-215Official
47	Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY		401 Nicollet Mall FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
48	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	23-215Official
49	Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.		570 Colonial Park Drive Suite 305 Roswell GA, 30075-3770 United States	Electronic Service		No	23-215Official
50	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	23-215Official
51	Mike	Henchen	mhenchen@rmi.org	Rocky Mountain Institute (RMI)		null null, null United States	Electronic Service		No	23-215Official
52	Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	23-215Official
53	Joylyn C	Hoffman Malueg	joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources		2685 145th St W Rosemount MN, 55068 United States	Electronic Service		No	23-215Official
54	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	23-215Official
55	Emma	Ingebretson	emma.ingebretsen@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall PO Box 59038 Minneapolis MN, 55402 United States	Electronic Service		Yes	23-215Official
56	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	23-215Official
57	John	Jaimez	john.jaimez@hennepin.us			Environment & Energy Department 701 4th Ave S Minneapolis MN, 55415 United States	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
58	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	23-215Official
59	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
60	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
61	Brendan	Jordan	bjordan@gpisd.net	Great Plains Institute & Bioeconomy Coalition of MN		2801 21st Ave S Ste 220 Minneapolis MN, 55407 United States	Electronic Service		No	23-215Official
62	Cliff	Kaehler	cliff.kaehler@novelenergy.biz	Novel Energy Solutions LLC		4710 Blaylock Way Inver Grove Heights MN, 55076 United States	Electronic Service		No	23-215Official
63	David	Kailbourne	edk@revlng.com	REV LNG, LLC		1002 Empson Rd Ulysses PA, 16948 United States	Electronic Service		No	23-215Official
64	D	Kalmon	dkalmon@mwmo.org	Mississippi Watershed Management Organization		2522 Marshall St NE Minneapolis MN, 55418-3329 United States	Electronic Service		No	23-215Official
65	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	23-215Official
66	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
67	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	23-215Official
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69	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-215Official
70	Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce		401 N Robert Street Suite 150 St Paul MN, 55101 United States	Electronic Service		No	23-215Official
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#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
72	Betsy	Lang	betsy.lang@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Ave Mall, 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		Yes	23-215Official
73	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	23-215Official
74	Samuel	Lehr	sam.lehr@rngcoalition.com	Coalition for Renewable Natural Gas		1017 L St #513 Sacramento CA, 95814 United States	Electronic Service		No	23-215Official
75	Robert	Lems	administration@dmt-cgs.com	DMT Clear Gas Solutions		19125 SW 125th Ct Tualatin OR, 97062 United States	Electronic Service		No	23-215Official
76	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	23-215Official
77	Annie	Levenson Falk	anniel@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	23-215Official
78	Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	23-215Official
79	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	23-215Official
80	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		Yes	23-215Official
81	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	23-215Official
82	Emily	Marshall	emarshall@lourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
83	Nicholas	Martin	nicholas.f.martin@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th floor Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
84	Linda	Martinez	lmartinez@auri.org	Agricultural Utilization Research Institute		null null, null United States	Electronic Service		No	23-215Official
85	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
86	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	23-215Official
87	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	23-215Official
88	Sarah	Mead	sarah.mead@wecenergygroup.com	MERC		null null, null United States	Electronic Service		No	23-215Official
89	Matthew	Melewski	matthew@theboutiquefirm.com	Nokomis Energy LLC & Ole Solar LLC		2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	23-215Official
90	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	23-215Official
91	Ana Sophia	Mifsud	amifsud@rmi.org	Rocky Mountain Institute (RMI)		null null, null United States	Electronic Service		No	23-215Official
92	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	23-215Official
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94	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
95	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	23-215Official
96	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-215Official
97	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
98	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
99	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	23-215Official
100	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
101	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	23-215Official
102	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	23-215Official
103	Carol A.	Overland	overland@legalectric.org	Legalectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-215Official
104	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-215Official
105	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	23-215Official
106	Antonio	Parisi	aparisi@sacyr.com	Sacyr Environment USA LLC		3330 Washington Blvd Ste 400 Arlington VA, 22201 United States	Electronic Service		No	23-215Official
107	Dean	Pawlowski	dpawlowski@otpco.com	Otter Tail Power Company		PO Box 496 215 S. Cascade St. Fergus Falls MN, 56537-0496 United States	Electronic Service		No	23-215Official
108	Lisa	Peterson	lisa.r.peterson@xcelenergy.com			414 Nicollet Mall FL 7 Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
109	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	23-215Official
110	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	23-215Official
111	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	23-215Official
112	Victoria	Reinhardt	victoria.reinhardt@co.ramsey.mn.us	Partnership on Waste and Energy		Ramsey County Board Office 15 W. Kellogg Blvd., Ste. 220 St. Paul MN, 55102 United States	Electronic Service		No	23-215Official
113	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	23-215Official
114	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental		26 E Exchange St,	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Advocacy		Ste 206 St. Paul MN, 55101-1667 United States				
115	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	23-215Official
116	Bjorgvin	Saevarsson	bjorgvin@yorthgroup.com	Yorth		500 East Grant Street 1207 #1207 Minneapolis MN, 55404 United States	Electronic Service		No	23-215Official
117	Kevin	Saville	kevin.saville@ftr.com	Citizens/Frontier Communications		2378 Wilshire Blvd. Mound MN, 55364 United States	Electronic Service		No	23-215Official
118	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
119	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	23-215Official
120	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	23-215Official
121	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	23-215Official
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