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May 15, 2024

VIA E-FILING

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2116

Re: In the Matter of a Petition by CenterPoint Energy for the Approval of its First Natural Gas Innovation Act (“NGIA”) Innovation Plan (“Plan”)

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

SUPPLEMENTAL COMMENTS

Dear Mr. Seuffert:

CenterPoint Energy Resources Corp d/b/a CenterPoint Energy Minnesota Gas (“CenterPoint Energy” or “the Company”) submits these Supplemental Comments to the Minnesota Public Utilities Commission (“the Commission”) in response to the Commission’s July 17, 2023, Notice of Comment Period and parties’ reply comments on the Company’s first Natural Gas Innovation Act (“NGIA”) innovation plan (“Plan”).

The Company appreciates the continued input of stakeholders and the Commission in the review of CenterPoint Energy’s first NGIA Plan. CenterPoint Energy has identified several areas of alignment in parties’ positions, reflecting a shared priority in employing innovation to advance towards Minnesota’s net zero goals. CenterPoint Energy requests that the Commission approve the Company’s Petition with the modifications outlined in the March 15, 2024 Reply Comments.

If you have questions, please contact us at Emily.Suppes@centerpointenergy.com, 612-321-5363, or Betsy.Lang@centerpointenergy.com, 612-321-4318.

Sincerely,

/s/ Emily Suppes

Director of Regulatory Affairs

/s/ Betsy Lang

Lead Regulatory Analyst

Enclosures

C: Service List

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

**Katie J. Sieben
Joseph K. Sullivan
Valerie Means
Hwikwon Ham
John A. Tuma**

**Chair
Vice Chair
Commissioner
Commissioner
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

SUPPLEMENTAL COMMENTS

I. INTRODUCTION

CenterPoint Energy Resources Corp d/b/a CenterPoint Energy Minnesota Gas (“CenterPoint Energy” or “the Company”) submits these Supplemental Comments in response to the Minnesota Public Utilities Commission’s (“the Commission’s”) July 17, 2023, Notice of Comment Period¹ and parties’ reply comments discussing the Company’s first Natural Gas Innovation Act (“NGIA”) innovation plan (“Plan”).²

The Company thanks the parties who provided additional feedback on CenterPoint Energy’s Plan in their reply comments. CenterPoint Energy is encouraged by significant areas of agreement between many parties as expressed in initial and reply comments including the following:

- All parties who filed Comments propose either approving the Plan, approving the Plan with modifications, or express support for specific pilot proposals. No party has proposed denying the Plan in full.

¹ *In the Matter of CenterPoint Energy’s Natural Gas Innovation Plan*, Docket No. G-008/M-23-215, Notice of Comment Period (Jul. 17, 2023). On October 31, 2023, the Commission extended the deadlines for comments in response to a request made by the Department of Commerce and supported by the Company, the Citizens Utility Board of Minnesota, and the Office of the Attorney General – Residential Utilities Division, to provide additional time to develop a complete record for Commission consideration.

² Between March 6 and March 15, 2024, the Center for Energy and Environment (“CEE”); the Clean Energy Organizations, consisting of the Minnesota Center for Environmental Advocacy, Fresh Energy, and the Sierra Club (“CEOs”); the Coalition for Renewable Natural Gas (“RNG Coalition”); and Laborers’ International Union of North America, Minnesota and North Dakota (“LIUNA”) filed reply comments. In addition, the Commission received three comments from interested members of the public filed in the docket on March 14, 2024, and April 29, 2024, (“Public Comments”) and a letter from the University of Minnesota Energy Management (“University”) filed in the docket on April 23, 2024, in support of Pilot H: Carbon Capture Rebates for Commercial Buildings and the research and development (“R&D”) pilot supporting the improvement of related carbon capture technology.

- Center for Energy and Environment (“CEE”), the International Union of Operating Engineers Local 49, LIUNA Minnesota & North Dakota (“LIUNA”), and the Coalition for Renewable Natural Gas (“RNG Coalition”) support the Plan in full.³
- LIUNA; the Clean Energy Organizations, consisting of the Minnesota Center for Environmental Advocacy, Fresh Energy, and the Sierra Club (“CEOs”); and the City of Minneapolis (“Minneapolis”) support providing the Company with budget flexibility in the implementation of the Plan.⁴
- CEE, the CEOs, and the Company have advocated similar approaches to Conservation Improvement Program/Energy Conservation and Optimization Act (“CIP/ECO”) and NGIA coordination, to ensure the inclusion of innovative program design and implementation of energy efficiency and electrification in NGIA.⁵
- While some parties suggest modifications to the apportionment of cost recovery,⁶ no party opposes the Company’s overall cost recovery approach to use the purchased gas adjustment for renewable natural gas (“RNG”) costs and costs for purchased electricity, with base rate and rider recovery for other Plan costs.

Many of the pilot proposals within the Plan received support from one or more parties, as shown in Table 1.

³ *In the Matter of CenterPoint Energy’s Natural Gas Innovation Plan*, Docket No. G-008/M-23-215, Center for Energy and Environment’s Reply Comments at 1 (Mar. 6, 2024) (“CEE Reply Comments”); *In the Matter of CenterPoint Energy’s Natural Gas Innovation Plan*, Docket No. G-008/M-23-215, Comments of the Center for Energy and Environment at 2 (Jan. 16, 2024) (“CEE Comments”) (concluding the Company’s Plan is “well-balanced and will advance our understanding of key technologies and strategies to address natural gas emissions across the different customer classes.”); *In the Matter of CenterPoint Energy’s Natural Gas Innovation Plan*, Docket No. G-008/M-23-215, Reply Comments of the Laborers’ International Union of North America Minnesota and North Dakota at 1 (Mar. 15, 2024) (“LIUNA Reply Comments”); *In the Matter of CenterPoint Energy’s Natural Gas Innovation Plan*, Docket No. G-008/M-23-215, Reply Comments of the Coalition for Renewable Natural Gas at 1 (Mar. 15, 2024) (“RNG Coalition Reply Comments”); *In the Matter of CenterPoint Energy’s Natural Gas Innovation Plan*, Docket No. G-008/M-23-215, Comments from the International Union of Operating Engineers Local 49 at 1 (Jan. 15, 2024) (“IUOE Comments”) (stating that IUOE “support the plan as a whole, recognizing that reducing greenhouse gas emissions from the natural gas utility system is going to take an array of innovative resources and approaches.”).

⁴ LIUNA Reply Comments at 1; *In the Matter of CenterPoint Energy’s Natural Gas Innovation Plan*, Docket No. G-008/M-23-215, Initial Comments of the Clean Energy Organizations at 51 (Jan. 16, 2024) (“CEOs Comments”); *In the Matter of CenterPoint Energy’s Natural Gas Innovation Plan*, Docket No. G-008/M-23-215, Comments of the City of Minneapolis at 9 (Jan. 17, 2024) (“Minneapolis Comments”) (supporting 5% budget flexibility as opposed to 25% as proposed by the Company).

⁵ As discussed further below in section II.d.

⁶ *In the Matter of CenterPoint Energy’s Natural Gas Innovation Plan*, Docket No. G-008/M-23-215, Initial Comments of the Department of Commerce, Division of Energy Resources at 87 (Jan. 17, 2024) (“Department Comments”) (recommending that the Commission use annual forecasted throughput to apportion cost recovery rather than assigning costs of pilots to customer classes); Initial Comments of the Citizens Utility Board of Minnesota at 18 (Jan. 16, 2024) (“CUB Comments”) (recommending further evaluation of potential pathways to lower the amount of Plan costs assessed to income-eligible customers, such as exempting customers enrolled in the Low-Income Home Energy Assistance Program from the Innovation Act Adjustment rider rate).

Table 1: Parties Supporting Specific Pilots⁷

Pilot	Supports	Supports with Qualifications or Proposed Modifications
B: RNG Produced from Ramsey & Washington Counties Organic Waste ⁱ	LIUNA, RNG Coalition	Department, Minneapolis
C: Renewable Natural Gas RFP Purchase ⁱⁱ	LIUNA, RNG Coalition	Department
D: Green Hydrogen Blending into Natural Gas Distribution System ⁱⁱⁱ	LIUNA, RNG Coalition	
E: Industrial or Large Commercial Hydrogen and Carbon Capture Incentives ^{iv}	LIUNA	Department, CUB, Minneapolis
F: Industrial Methane and Refrigerant Leak Reduction ^v	CEE	Department, Minneapolis
G: Urban Tree Carbon Offsets ^{vi}	Minneapolis	
H: Carbon Capture Rebates for Commercial Buildings ^{vii}	Minneapolis	
I: New Networked Geothermal Systems ^{viii}	CEE, CEOs, CUB, GeoExchange, Public Comments, Minneapolis	
J: Decarbonizing Existing District Energy Systems ^{ix}		CEOs, Minneapolis
K: New District Energy System ^x	Minneapolis	CEOs
L: Industrial Electrification Incentive ^{xi}	CEE, CUB, Public Comments	CEOs, Minneapolis
M: Commercial Hybrid Heating ^{xii}	CEE, CUB, Minneapolis	CEOs
N: Residential Deep Energy Retrofits and Electric Air Source Heat Pumps ^{xiii}	CEE, CUB, Minneapolis, Public Comments	CEOs, Department
O: Small/Medium Business GHG Audit ^{xiv}	CUB	Department, Minneapolis
Q: Gas Heat Pumps for Commercial Buildings ^{xv}		Department
R: Industrial and Large Commercial GHG Audit Pilot ^{xvi}		Minneapolis

⁷ The exclusion of a party from Table 1 should not be taken to mean that the party opposed the specific pilot. Not all parties provided comments on every pilot and a number of parties filed comments in support of the as-filed Plan without modifications. In particular, while CEE, LIUNA, Local 49, and the RNG Coalition have stated their support for the Plan in its entirety, Table 1 only identifies where those parties provided specific comments in support of a particular pilot. Table references continue on the next page.

(Table 1 References)

- I. LIUNA Reply Comments at 1 (supporting RNG and hydrogen pilots); *In the Matter of CenterPoint Energy's Natural Gas Innovation Plan*, Docket No. G-008/M-23-215, Comments of the Coalition for Renewable Natural Gas at 5 (Jan. 16, 2024) ("RNG Coalition Comments"); Department Comments at 20, 30, 38, 91, 94 (recommending various modifications to Pilot B); Minneapolis Comments at 3 (expressing support for Pilot B if local air quality impacts are acceptable for nearby residents).
- II. LIUNA Reply Comments at 1 (supporting RNG and hydrogen pilots); RNG Coalition Comments at 6; Department Comments at 20-22, 29, 36, 91 (recommending various modifications to Pilot C).
- III. LIUNA Reply Comments at 1 (supporting RNG and hydrogen pilots); RNG Coalition Comments at 7.
- IV. LIUNA Reply Comments at 1 (supporting RNG and hydrogen pilots); Department Comments at 42, 45, 91 (recommending various modifications to Pilot E); CUB Comments at 3 (recommending limiting Pilot E to industrial facilities amenable to electrification); Minneapolis Comments at 4-5 (supporting Pilot E provided CenterPoint Energy's GHG reduction estimates are realistic and recommending requiring participant contributions).
- V. CEE Comments at 5; Department Comments at 46, 91 (recommending reducing participation estimates and Pilot budget); Minneapolis at 5 (recommending that contractors be solicited from in-state).
- VI. Minneapolis Comments at 5.
- VII. Minneapolis Comments at 6.
- VIII. CEE Comments at 5; CUB Comments at 2, 19; CEOs Comments at 37; Comments of the Geothermal Exchange Organization at 1 (Jan. 15, 2024); *In the Matter of CenterPoint Energy's Natural Gas Innovation Plan*, Docket No. G-008/M-23-215, Comments of Lee Samelson at 1 ("Samelson Comments") and Kristin Dawkins at 1 (Mar. 14, 2024) ("Dawkins Comments"); *In the Matter of CenterPoint Energy's Natural Gas Innovation Plan*, Docket No. G-008/M-23-215, Comments of Satish Desai at 1 ("Desai Comments") (Apr. 29, 2024); Minneapolis Comments at 6 (recommending expanding the Pilot).
- IX. CEOs Comments at 38, 50 (recommending that feasibility studies conducted through the pilot consider a full electrification/decarbonization scenario and prioritization of pilots satisfying statutory definition of district energy); Minneapolis Comments at 7 (recommending increased incentives).
- X. Minneapolis Comments at 7; CEOs Comments at 39 (recommending that feasibility studies conducted through the pilot include a full electrification/decarbonization scenario).
- XI. CEE Reply Comments at 5-6; CUB Comments at 2; Samelson Comments at 1; Dawkins Comments at 1.
In the Matter of CenterPoint Energy's Natural Gas Innovation Plan, Docket No. G-008/M-23-215, Reply Comments of the Clean Energy Organizations at 1-3 (Mar. 15, 2024) ("CEOs Reply Comments") (recommending Pilot be modified to not require hybrid heating systems); Minneapolis Comments at 7 (recommending requiring participant co-pays).
- XII. CEE Reply Comments at 7-8; CUB Comments at 2; Minneapolis Comments at 7; CEOs Reply Comments at 1-3 (recommending Pilot be modified to not require hybrid heating systems).
- XIII. CEE Reply Comments at 8-9; CUB Comments at 2; Minneapolis Comments at 8; Samelson Comments at 1; Dawkins Comments at 1; Desai Comments at 1; CEOs Reply Comments at 3 (recommending Pilot be modified to not require hybrid heating systems); Department Comments at 60, 92 (recommending reduced budget).
- XIV. CUB Comments at 3; Department Comments at 62, 92 (recommending reducing Pilot budget); Minneapolis Comments at 8 (recommending that the Pilot focus on insulation and high efficiency appliances).
- XV. Department Comments at 63, 92 (recommending requiring a customer co-pay).
- XVI. Minneapolis Comments at 9 (supporting the pilot but expressing concern that incentives budget was low relative to project delivery).

The variety of resources and technologies, and parties' multifaceted goals and experience that inform their support for the corresponding pilots, will provide a foundation for the state's energy transition that continues to value diversity in innovation.

The remainder of these Supplemental Comments respond to statutory and policy issues and recommendations related to individual pilots that were raised in parties' reply comments.⁸

II. NGIA Statutory and Policy Issues

This section of the Company's Supplemental Comments responds to overarching policy issues affecting more than one pilot discussed in parties' reply comments.

a. RNG and Hydrogen Blending Generally

LIUNA supports CenterPoint Energy's proposed hydrogen and RNG blending pilots stating that "both are justified – and in fact essential – elements of the innovation plan. The decision by the Legislature to require that half of investments in the initial round of innovations be dedicated to fuels is an indication of the priority lawmakers placed on deployment of clean fuels that can be blended or 'dropped in' to reduce the carbon footprint of geologic natural gas."⁹

CenterPoint Energy appreciates LIUNA's support for its proposed pilots and agrees that RNG and hydrogen blending are essential elements of its Plan. As LIUNA observes, the requirement that half of initial plan investments be targeted toward low-carbon fuels indicates legislative support for RNG and hydrogen blending. The NGIA defines RNG as distinct from biogas, with the difference between the two innovative resources being that RNG is "processed to be interchangeable with . . . natural gas produced from conventional geologic sources."¹⁰ This distinction makes clear the legislature intended the NGIA to facilitate fuel blending and the implementation of lower carbon fuels that could be "dropped in" to the pipeline in place of geologic gas. As discussed by the RNG Coalition, utilizing existing gas infrastructure can provide cost and emissions savings compared to constructing new dedicated infrastructure.¹¹ In enacting the NGIA, the Legislature authorized Minnesota's natural gas utilities to file NGIA

⁸ Parties also reiterated their positions in reply comments on topics that were addressed in initial comments and discussed in CenterPoint Energy's March 15, 2024, Reply Comments. CenterPoint Energy does not restate its responses to those topics and recommendations in these supplemental comments. The Company notes, however, that in footnote 106 of its Reply Comments, CenterPoint Energy stated that the Plan would reduce emissions by an estimated 312,000 metric tons CO₂e over five years and that the CEOs had included an incorrect figure in their Comments. Upon further investigation, the correct figure is 303,739 metric tons CO₂e. The Company apologizes for the confusion. However, the Company notes that annual first year GHG reduction (approximately 86,000 metric tons or 1% of emissions for 2020 sales) is a better estimation of annual GHG reduction potential of the Plan than the five-year figure used by the CEOs to develop their recommended annual reduction goal.

⁹ LIUNA Reply Comments at 1.

¹⁰ Minn. Stat. § 216B.2427, subd. 1(o). The definition of RNG also requires that RNG have a lower lifecycle GHG intensity than geologic natural gas but biogas eligible for NGIA must also satisfy this requirement. Minn. Stat. §216B.2427, subd. 2(b)(4).

¹¹ RNG Coalition Comments at 6-7; see also RNG Coalition Reply Comments at 3.

plans, recognizing the value of utilizing existing natural gas infrastructure to achieve greenhouse gas (“GHG”) reduction goals.

LIUNA also acknowledges, with respect to the information provided by the Company, that hydrogen and RNG are emerging resources, especially as deployed by natural gas utilities, and involve emerging markets. LIUNA observes that “many of the responses to proposed hydrogen, RNG, and other innovation pilots treat the innovations as if they were an established resource similar to a wind or solar farm or a gas peaking plant, when the law appropriately directs the Commission to deploy innovations in order to better understand how they might fit in decarbonization strategies.”¹² CenterPoint Energy agrees that it is important to consider that resources proposed under the Company’s NGIA Plan, including RNG and hydrogen, are novel and nascent technologies, and it is not reasonable to expect the same level of information as might be available for an established resource. Nevertheless, the Company did provide substantial information on proposed pilots in its Plan filing including estimated pricing, volumes, and GHG reductions for each pilot. Additionally, the Company has initiated its request for proposals (“RFP”) process for the Renewable Natural Gas RFP Purchase (“Pilot C”), with proposals due in advance of the Commission hearing on the proposed Plan and expects to be able to provide additional information at that time.

b. Budget Flexibility

LIUNA also expresses support for CenterPoint Energy’s request for budget flexibility noting that “[c]onstruction and other capital projects are currently experiencing unanticipated cost pressures both across the energy sector and other industries, even where such projects involve markets and technologies such as solar generation that are well understood. It would be unrealistic for the deployment of innovations that are much less well established to fall cleanly within established budgets. Instead, we can expect that some pilots will exceed expected budgets while others may fall below or fail to materialize entirely based on lack of market demand or other factors.”¹³ CenterPoint Energy appreciates LIUNA’s perspective on why reasonable budget flexibility may be even more important at this time, given current economic conditions. The Company continues to request budget flexibility, as described in its Petition and discussed in greater detail in the Company’s Reply Comments, so that it may effectively operate approved NGIA pilots. While the Company has endeavored to develop realistic estimates for pilot participation and expenses, it is likely that some pilots will exceed expectations while others may fall short. Budget flexibility will allow the Company to continue to fund successful pilots, maximizing Plan benefits and avoiding potential customer frustration if popular offerings are eliminated or minimized due to budget constraints.

¹² LIUNA Reply Comments at 1-2.

¹³ LIUNA Reply Comments at 1.

c. Job Creation

In expressing support for the Company's NGIA Plan, LIUNA notes the Plan's potential to accelerate development of innovations that will be needed for Minnesota's clean energy future and that have the potential to create jobs for LIUNA members and many other workers.¹⁴ LIUNA also noted the NGIA "could have a significant impact on the development of labor standards and workforce in key emerging clean energy industries ranging from building energy efficiency and electrification to production and transport of hydrogen and RNG to carbon capture to geothermal energy systems."¹⁵ Given the importance of these objectives, LIUNA requests that the Company and the Commission "pay close attention to associated direct and indirect job creation in order to ensure that NGIA supports the development of high-quality jobs and skilled workforce that are available to the greatest extent possible to residents of the state and the utility's service territory."¹⁶ A clear goal of the NGIA is to create quality jobs within Minnesota.¹⁷ The Company has committed to satisfying Inflation Reduction Act ("IRA") prevailing wage requirements and seeking to satisfy apprenticeship requirements for pilots where it will employ or contract directly for the applicable workforce.¹⁸ In doing so, CenterPoint Energy seeks to further this policy goal and to ensure that the Company can achieve the maximum IRA tax benefits for its customers. The Company looks forward to working with LIUNA and others to bring economic benefits to the state as it implements the Plan.

d. Co-Application of NGIA and CIP/ECO

In their reply comments, CEE and the CEOs state a similar position with respect to co-application of the CIP/ECO and NGIA frameworks. Each party emphasizes the importance of the term "investments" in the NGIA in urging the Commission to approve certain energy efficiency and strategic electrification pilots.¹⁹ CEE urges the Commission "to consider the broad and flexible interpretation of the term 'investment' that underlies the Commission's September 12, 2022, Order in evaluating whether CenterPoint Energy's proposed energy efficiency and electrification pilots should be approved through NGIA." CEE also observes that while some of the technologies proposed may be eligible for inclusion in ECO, the intensive program design, field testing, and market development work proposed by the Company could not reasonably be included in ECO or shown to be cost-effective under the ECO framework.²⁰ Notably, the

¹⁴ LIUNA Reply Comments at 1.

¹⁵ LIUNA Reply Comments at 2.

¹⁶ LIUNA Reply Comments at 2.

¹⁷ See, e.g., Minn. Stat. § 216B.2427, subd. 2(a)(11) (requiring that an NGIA plan include "projected local job impacts resulting from implementation of the plan and a description of steps the utility and the utility's energy suppliers and contractors are taking to maximize the availability of construction employment opportunities for local workers."); Minn. Stat. § 216B.2427, subd. 2(b)(3) (requiring an NGIA plan to promote local economic development); Minn. Stat. § 216B.2427, subd. 2(f)(5) (requiring that annual reports on an approved plan include a discussion of the economic impact of the plan, including job creation).

¹⁸ These pilots include Green Hydrogen Blending into Natural Gas Distribution System (Pilot D) and New Networked Geothermal Systems (Pilot I).

¹⁹ CEE Reply Comments at 4; CEOs Reply Comments at 1-2.

²⁰ CEE Reply Comments at 4.

Commission's September 12, 2022, Order in Docket No. G-999/CI-21-566 requires that, to be eligible for inclusion in NGIA plans, utilities must "[c]learly demonstrate why the proposed energy efficiency and strategic electrification *investments* could not *reasonably* be included in the utility's conservation improvement program."²¹ In addition to reiterating the importance of the term "investment" as used in the NGIA statute, the Commission's Order also makes clear that utilities need not show that it would be impossible to include proposed investments in CIP/ECO for them to be eligible for inclusion in an NGIA plan; rather, utilities must demonstrate that it would not be "reasonable" to include the proposed investments in CIP/ECO.

The CEOs similarly reiterate the flexibility that was intended with use of the term "investments" in the NGIA statute, noting that, "relying on the term 'investments' used in the statutory definition of energy efficiency and strategic electrification creates flexibility regarding what type of efficiency and electrification programs, measures, or approaches might qualify in the future."²² As the CEOs note, the NGIA "is intended to complement ECO by unlocking efficiency and electrification investments that could not be reasonably included in a utility's ECO plan. In other words, the Company's NGIA proposal should work to achieve energy savings and GHG reductions that go beyond ECO, even if the measures or programs included in both have overlap."²³ In evaluating whether investments could reasonably be included in the Company's CIP/ECO plan, both CEE and the CEOs focus on the intensive program design and market development elements of the proposed NGIA electrification and energy efficiency pilots, noting that ECO is not designed to achieve market transformation or overcome significant market barriers.²⁴

The Company agrees with both CEE and the CEOs that co-application of CIP/ECO with NGIA maximizes benefits for CenterPoint Energy's customers and is consistent with state policy objectives. As CenterPoint Energy stated in its Reply Comments, "the Company has proposed energy efficiency and strategic electrification pilots designed to reach specialized or difficult-to-serve customer segments or to encourage the adoption of technologies not widely deployed through CIP/ECO by offering a significant amount of customer support."²⁵ The Company agrees with CEE and the CEOs that the statutory term "investments" provides flexibility to deploy established technologies in innovative ways.

²¹ *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 (Sept. 12, 2022) (emphasis added).

²² CEOs Reply Comments at 2 (quoting with agreement Joint Comments filed on July 1, 2022 in Docket No. G-999/CI-21-566).

²³ CEOs Reply Comments at 2.

²⁴ CEOs Reply Comments at 1-2; CEE Reply Comments at 2-3 ("NGIA provides the opportunity to test cutting-edge technologies and approaches that may not be considered cost effective under the ECO framework but could become so with strategic investment and development through NGIA. ECO provides the venue to broadly deploy innovative technologies and approaches that prove successful and cost-effective through NGIA.").

²⁵ *In the Matter of CenterPoint Energy's Natural Gas Innovation Plan*, Docket No. G-008/M-23-215, Reply Comments of CenterPoint Energy at 19 (Mar. 15, 2024) ("CenterPoint Energy Reply Comments").

CenterPoint Energy also agrees with CEE and the CEOs that in evaluating whether an investment could “reasonably” be included in the Company’s CIP/ECO portfolio, it is appropriate for the Commission to consider the intensive programming needed to advance the new or emerging technologies and approaches designed to reach hard-to-reach customer groups or overcome barriers to customer adoption. It is also notable that in approving CenterPoint Energy’s 2024-2026 ECO Plan, Department of Commerce (“Department”) Staff found CenterPoint Energy’s decision not to include additional electrification investments in its CIP/ECO plan to be reasonable.²⁶ As Department Staff acknowledged, “it is up to the utility to determine the best balance of programs, measures, and approaches that will allow them to meet their ECO statutory requirements.”²⁷ The Department rejected several proposals to include additional strategic electrification measures in CenterPoint Energy’s ECO Plan beyond those the Company had proposed, stating, “Staff understand CPE’s hesitation in incentivizing these technologies as this is new territory for natural gas utilities. Staff believe the concerns that CPE raises in its reply comments are valid.”²⁸

Determining whether it is reasonable to include a particular investment in the utility’s CIP/ECO requires consideration of the customer segment to be reached, the level of marketing and development that may be required to encourage customer participation, the level of customer and contractor/installer education and awareness regarding the technology, and other investment-specific considerations such as the availability of trained installers or potential impacts to customer bills. As advocated by CEE, in determining what energy efficiency and electrification pilots should be included in NGIA, the Commission should “look beyond whether a particular piece of equipment or technology can be cost-effectively included in ECO and also consider the intensive programming needed to advance a new or emerging technology or approach.”²⁹ Accordingly, while it may be possible as a matter of statute or regulatory requirements to include some of the strategic electrification or energy efficiency measures proposed in NGIA in CenterPoint Energy’s CIP/ECO Plan, that does not mean that it would be *reasonable* to do so. In each instance of strategic electrification and energy efficiency included in the Company’s NGIA Plan, CenterPoint Energy has demonstrated why it would not be *reasonable* to include the investment in CIP/ECO; accordingly, the Commission should approve the proposed investments in the Company’s NGIA Plan as proposed.³⁰

²⁶ *In the Matter of CenterPoint Energy’s 2024-2026 Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-95, et al., Decision at 149-150, 164, 178, 194, 252, 259 (Dec. 1, 2023).

²⁷ *In the Matter of CenterPoint Energy’s 2024-2026 Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-95, et al., Decision at 157 (Dec. 1, 2023).

²⁸ *In the Matter of CenterPoint Energy’s 2024-2026 Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-95, et al., Decision at 149-150, 164, 178, 194, 232, 252, 259 (Dec. 1, 2023).

²⁹ CEE Reply Comments at 3.

³⁰ See *In the Matter of CenterPoint Energy’s Natural Gas Innovation Plan*, Docket No. G-008/M-23-215, Petition at Exhibit I (June 28, 2023). CenterPoint Energy further explained its reasons for proposing energy efficiency and strategic electrification investments for NGIA as opposed to CIP/ECO in its Reply Comments filed on March 15, 2024.

III. Response to Reply Comments on Proposed NGIA Pilots

This section of the Company's Supplemental Comments responds to parties' comments, recommendations, and proposed modifications for individual pilots.

Pilot C. **Renewable Natural Gas Request for Proposal ("RFP") Purchase:** CenterPoint Energy proposes to issue an RFP to purchase an additional amount of RNG to complete its RNG portfolio.

The CEOs, the RNG Coalition, and Lee Samelson provided reply comments on Pilot C specifically. This feedback is summarized below, but first the Company provides an update on the status of its RFP for this Pilot.

RFP Status Update

As described in the Company's March 15, 2024, Reply Comments, through discussions with developers, the Company determined that multiple Minnesota RNG projects are seeking to secure offtake agreements this spring or summer. Accordingly, CenterPoint Energy has moved forward with issuing the RFP contemplated by this Pilot in order to ensure these local RNG producers will have an opportunity to submit proposals. The Company released its RFP on April 15, 2024. The deadline for responses is May 23, 2024. The Company anticipates completing preliminary selection of proposals in advance of a Commission hearing in this docket and may have entered into one or more contracts with proposers by the time of the hearing. All contracts will be contingent upon Commission approval of relevant portions of the Company's Plan.

Summary of Reply Comments

The CEOs opposed the Department's proposal to remove portions of the budget for Pilot C associated with wastewater and landfill feedstocks, arguing that research has identified wastewater and landfill gas as more favorable feedstock options.³¹

The RNG Coalition stated that CenterPoint Energy may receive a substantial number of responses to its RFP based on Minnesota RNG potential.³² In response to the Department's recommendation that CenterPoint Energy be directed to purchase unbundled commodity gas without the associated environmental attributes based on the Department's understanding that "the bottle neck for a potential RNG developer is to find an off taker for its brown gas," the RNG Coalition notes its belief that the Department "may be conflating the process of interconnection—which is often cited as a potential bottle neck for RNG producers—with the purchase of brown gas."³³ Finally, the RNG Coalition drew a parallel between the current state

³¹ CEOs Reply Comments at 3.

³² RNG Coalition Comments at 1.

³³ RNG Coalition Comments at 2.

of the RNG market and early clean electricity markets, where flexibility in the geography of resource procurement was important to the industry's growth.³⁴

Lee Samelson commented that it is worth exploring RNG for its potential to bolster circular economies and stated that it would be important to evaluate cost-effectiveness of RNG in terms of lifecycle GHG reductions.³⁵

Response to Reply Comments

The Company agrees with the CEOs that the Commission should allow the Company to work to identify developers, as opposed to eliminating budget for landfill and wastewater archetypes at this stage.³⁶ The Company reiterates that the Pilot C budget is not intended to be split prescriptively among the archetype projects. Instead, the Company used the feedstock-specific archetypes to develop estimated budgets, GHG reductions, job creation, and other costs and benefits for Pilot C as a whole. The Company intends to remain flexible to select the best options among RFP responses, as opposed to trying to satisfy quotas for RNG by feedstock. As noted above, CenterPoint Energy anticipates that by the time this docket comes before the Commission for hearing, the Company will be able to provide additional information based on the responses it received to its RFP, including potential information regarding the proportion of various feedstocks that could be deployed through this Pilot.

The Company appreciates the RNG Coalition's perspective on the status of the RNG industry generally, and in Minnesota specifically. It is also the Company's understanding that the sale of commodity gas without the environmental attributes is not a significant barrier for RNG developers that are already interconnected to the natural gas pipeline system, and CenterPoint Energy agrees with the RNG Coalition that purchasing commodity gas without environmental attributes in Pilot C would be counter to the intent of NGIA.³⁷ Accordingly, the Company continues to oppose the Department's proposal that Pilot C be modified to include the purchase of RNG without environmental attributes.

The Company agrees with Mr. Samelson that RNG has potential to promote circular economies and notes that one of the goals of NGIA is to promote waste reduction and reuse.³⁸ With respect to cost-effectiveness and lifecycle GHG reductions, the NGIA requires that the Company annually report on various costs and benefits of its approved plan including costs incurred and lifecycle GHG emissions reductions achieved.³⁹

Pilot H. **Carbon Capture Rebates for Commercial Buildings:** CenterPoint Energy proposes to provide rebates to commercial customers that install CarbinX carbon capture systems manufactured by CleanO2. These units

³⁴ RNG Coalition Comments at 3.

³⁵ Samelson Comments at 2-3.

³⁶ CEOs Reply Comments at 3.

³⁷ RNG Coalition Comments at 2.

³⁸ Minn. Stat. § 216B.2427, subd. 2(a)(9).

³⁹ Minn. Stat. § 216B.2427, subd. 2(f).

connect to existing natural gas heating equipment, capture CO₂, and convert it into chemicals that are resold for commercial uses.

The University of Minnesota (“University”) filed a letter indicating its interest in participating in Pilot H, and recommending the Commission approve the Pilot.⁴⁰ The University also stated that it is interested in the higher carbon capture units that are being developed, which CenterPoint Energy has proposed to evaluate through the proposed “Assessing Next-Generation Micro-Carbon Capture for Commercial Buildings” research and development (“R&D”) Pilot. As stated in the University’s letter, the University is interested in this technology to help meet its ambitious carbon reduction goals.

CenterPoint Energy appreciates the support of the University for this proposed Pilot. As the Company stated in Reply Comments, there is significant customer interest in this technology and while the Company began piloting CarbinX units through CIP/ECO prior to the passage of NGIA, its primary focus in that context has been energy efficiency savings made possible by the units. Unlike NGIA, CIP/ECO is not intended to enable carbon capture pilots. As noted by CEE, “NGIA’s cost-benefit framework is more flexible and expansive than the cost-effectiveness tests used in ECO, and it places value on making strategic investments today to drive innovation and ratepayer and societal benefits for the future.”⁴¹ The University’s letter reflects the significant customer interest in the carbon capture capability of CarbinX units and, given that the Company’s CIP/ECO R&D Pilot is fully subscribed, approval of Pilot H is important to enable customers like the University to pilot this technology.

CenterPoint Energy also appreciates the University’s interest in the Company’s related R&D proposal “Assessing Next-Generation Micro-Carbon Capture for Commercial Buildings,” which proposes to field test the next generation of CarbinX units, which capture a higher proportion of carbon emissions. As described in the Plan, if the results of this R&D project are favorable, CarbinX version 4.0 would be eligible for rebates through Pilot H, with the potential to deliver even greater benefits.

Pilot I. **New Networked Geothermal Systems:** CenterPoint Energy proposes to 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.

The CEOs and Public Comments⁴² expressed support for Pilot I. The CEOs made additional recommendations with respect to the Pilot, which the Company addresses below.

The CEOs stated that they were not opposed to the Minnesota Office of the Attorney General’s (“OAG”) recommendation to have the Commission reassess approval for the implementation

⁴⁰ *In the Matter of CenterPoint Energy’s Natural Gas Innovation Plan*, Docket No. G-008/M-23-215, University of Minnesota Energy Management Letter (Apr. 23, 2024)

⁴¹ CEE Reply Comments at 2.

⁴² CEOs Reply Comments at 5-6; Dawkins Comments at 1; Samelson Comments at 1.

portion of Pilot I after the Company provides more details and the CEOs suggested that the Company provide additional details and seek funding in an annual status report.⁴³ In its Plan, the Company proposed to file site identification, a feasibility study, and updated cost and estimated lifecycle GHG reduction information in an annual status report. The Company does not oppose the recommendation to receive additional Commission approval based on the results of the feasibility study, prior to moving ahead with implementation of the Pilot. However, CenterPoint Energy requests flexibility in the timing of such review and approval, to allow Pilot implementation to proceed in the event the scoping is completed outside of the Company's annual status report filings.

The CEOs responded to the Department's suggestion that the feasibility study for Pilot I include environmental impacts analysis and exploration of alternative energy solutions. The CEOs argued that these analyses should not be required for an initial feasibility study such as that proposed for Pilot I.⁴⁴ The Company agrees with the CEOs that environmental impacts analysis may be premature for the initial feasibility study. The Company will comply with all applicable regulations with respect to environmental review at the appropriate time in the project development process. With respect to alternative energy solutions analysis, the purpose of the Pilot is not to explore all possible options for serving a specific community but instead to explore the potential of networked geothermal systems; accordingly, the Company agrees with the CEOs that an alternative energy analysis is likely not appropriate.

The CEOs also disagreed with the Department's suggestion to target Pilot I at new construction because "this restriction would eliminate a variety of potentially valuable projects from future consideration, including installation of geothermal networks in areas where future gas replacements are planned."⁴⁵ The CEOs comments highlight the Company's point made in Reply Comments that there will be many evaluation criteria for site selection and that no single site is likely to meet all desired characteristics.⁴⁶

Pilot J. **Decarbonizing Existing District Energy Systems:** CenterPoint Energy proposes to 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.

Pilot K. **New District Energy System:** CenterPoint Energy proposes a Pilot to 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.

Regarding Pilots J and K, the Department's position in initial comments was that the proposed Pilots be denied because they may not satisfy the statutory definition of "district energy" in all

⁴³ CEOs Reply Comments at 5.

⁴⁴ CEOs Reply Comments at 6.

⁴⁵ CEOs Reply Comments at 6.

⁴⁶ CenterPoint Energy Reply Comments at 70.

cases.⁴⁷ CenterPoint Energy agrees with the CEOs' Reply Comments that the Department's position is "an unnecessary limitation on utilities' ability to pursue electrification and energy efficiency projects in NGIA."⁴⁸

Pilot L. **Industrial Electrification Incentives:** CenterPoint Energy would 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.

CEE, the CEOs, and Public Comments⁴⁹ expressed support for Pilot L.

In initial comments, the Department argued that Pilot L was ineligible for inclusion in the Plan and should be rejected by the Commission because it could be pursued in CIP/ECO.⁵⁰ In response, CEE and the CEOs both argued that Pilot L is appropriate for NGIA.⁵¹ CEE noted that industrial electrification technologies are "extremely nascent" and will require investment to demonstrate applicability, economics, and technical viability.⁵² CEE stated that they are not aware of any industrial electrification projects being implemented in Minnesota.⁵³ The Company agrees that the nascence of industrial electrification technologies, and the need for intensive programming to overcome barriers to adoption, make Pilot L more appropriate for NGIA than CIP/ECO at this time.

The CEOs requested that the Commission modify Pilots L and M to ensure that they are not limited to hybrid heating systems, asserting that hybrid heating is not a statutory requirement.⁵⁴ The Company clarifies that it is not limiting Pilot L to hybrid heating systems for the specific process or application to be electrified.⁵⁵ However, NGIA defines "strategic electrification" to mean, in part, "the installation of electric end-use equipment in an existing building in which natural gas is a primary or back-up fuel source, or in a newly constructed building in which a customer receives natural gas service for one or more end-uses...".⁵⁶ The Company believes that this definition indicates a legislative intent that the customer receiving a strategic electrification measure remain a CenterPoint Energy customer following installation of the measure. Further, requiring the customer to remain a CenterPoint Energy customer as a criterion for participation ensures the customer receiving the benefits of program participation is responsible to pay a portion of the associated costs via their CenterPoint Energy bill, thereby

⁴⁷ Department Comments at 53, 54.

⁴⁸ CEOs Reply Comments at 7.

⁴⁹ CEE Reply Comments at 5-6; CEOs Reply Comments at 1-3; Dawkins Comments at 1; Samelson Comments at 1.

⁵⁰ Department Comments at 57-58.

⁵¹ CEE Reply Comments at 5-6; CEOs Reply Comments at 2.

⁵² CEE Reply Comments at 5-6.

⁵³ CEE Reply Comments at 5.

⁵⁴ CEOs Reply Comments at 2-3.

⁵⁵ The Company does propose to require gas backup for Pilot M, as the goal of that Pilot is to explore and promote hybrid heating systems.

⁵⁶ Minn. Stat. § 216B.2427, subd. 1(q).

avoiding subsidization and equity issues associated with having remaining gas customers pay for others to discontinue their gas service.

The CEOs encouraged the Company to collect data on how often gas backup is used for partially electrified systems incented through Pilots L and M. The Company agrees to collect this data for Pilot L and proposes to include this information in annual status reports. CenterPoint Energy intends to conduct measurement and verification on a subset of participants for Pilot M and agrees to collect this data for that subset of participants and include this information in annual status reports.

Pilot M. **Commercial Hybrid Heating:** CenterPoint Energy proposes to 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.

CEE and the CEOs⁵⁷ expressed support for Pilot M.⁵⁸

In initial comments, the Department argued that Pilot M was not suitable for NGIA because other Minnesota utilities support such systems through CIP/ECO.⁵⁹ In response, CEE stated:

While it may be true that bundling commercial hybrid heating systems with other cost-effective measures could allow a broader program to be cost-effective under the ECO framework, we do not believe that should disqualify the measure from inclusion in NGIA. As with industrial electrification, hybrid heating systems in commercial buildings are rare. Customers are often reluctant to invest in the technology and contractors can be reluctant to recommend the technology due to a lack of familiarity and information. Therefore, even if there were ECO incentives for commercial hybrid heating systems, that alone is not likely to move the market, as commercial hybrid systems face significant market barriers.⁶⁰

The Company agrees with CEE’s reasoning. As proposed, Pilot M includes substantial customer support in order to address potential reluctance by customers and contractors. The Company believes that these additional support services are useful and necessary for success of the Pilot, and notes that their inclusion makes the Pilot less cost-effective under the CIP/ECO Minnesota, societal, and utility tests. As stated by CEE, “NGIA provides the opportunity to test cutting-edge technologies and approaches that may not be considered cost effective under the

⁵⁷ CEE Reply Comments at 7-9; CEOs Reply Comments at 1-3.

⁵⁸ The Company notes that the CEOs made comments relating to Pilots L and M, which the Company addresses above in relation to Pilot L.

⁵⁹ Department Comments at 58-59.

⁶⁰ CEE Reply Comments at 7-8.

ECO framework but could become so with strategic investment and development through NGIA.”⁶¹

CEE noted that hybrid space heating systems will be a critical tool in reducing emissions associated with natural gas consumption in commercial buildings, and that Pilot M could complement the Minnesota Efficient Technology Accelerator program efforts in this space.⁶² The Company agrees with CEE and looks forward to contributing to efforts to address barriers that prevent widespread deployment of commercial hybrid heating systems.

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

CEE, the CEOs, Kristin Dawkins, and Lee Samelson expressed support for Pilot N. CEE and the CEOs offered perspectives that the Company responds to below.

In its Initial Comments, the Department expressed concern that CenterPoint Energy had set participation goals too high for Pilot N.⁶³ CEE responded, noting that CEE was one of the vendors that had provided a proposal that was used in the development of Pilot N. Although CEE’s participation targets were lower than those proposed by CenterPoint Energy, CEE believes that the Company’s proposed targets and budget are attainable.⁶⁴ CenterPoint Energy appreciates CEE’s perspective on the Company’s proposed budget and participation goals.

The CEOs recommended that Pilot N not be limited to hybrid heating systems, and that the Company prioritize investment in electric-only systems.⁶⁵ As discussed above in response to similar arguments related to Pilots L and M, the NGIA requires that proposed strategic electrification investments be limited to participants who receive natural gas service. Requiring customers who participate in NGIA strategic electrification offerings to remain CenterPoint Energy customers serves an important policy objective by mitigating subsidization issues between former and current CenterPoint Energy customers. Accordingly, the Company disagrees with the CEOs’ suggestion that Pilot N be modified to target full electrification of home heating systems.

IV. Conclusion and Recommendations

The Company thanks the Commission for consideration of these Supplemental Comments. CenterPoint Energy continues to request approval of its Plan as modified in its Reply Comments.

⁶¹ CEE Reply Comments at 2-3.

⁶² CEE Reply Comments at 8.

⁶³ Department Comments at 60.

⁶⁴ CEE Reply Comments at 9.

⁶⁵ CEOs Reply Comments at 10.

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

SUPPLEMENTAL COMMENTS

CERTIFICATE OF SERVICE

Melodee Carlson Chang, certifies that on Wednesday, May 15, 2024, she served the attached Supplemental Comments 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.

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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_23-215_Official

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