

December 15, 2025

VIA E-FILING

Assistant Commissioner Sydnie Lieb
Minnesota Department of Commerce
Division of Energy Resources
85 7th Place East, Suite 280
St. Paul, MN 55101

Re: In the Matter of the Minnesota Technical
Reference Manual Version 5.0
Docket No. E,G999/CIP-18-694
REPLY COMMENTS

Dear Dr. Lieb:

Minnesota Power (or, the "Company") respectfully submits the following reply comments to the Minnesota Department of Commerce, Division of Energy Resources ("Department") in response to initial comments submitted during the comment period on the Department's proposed decision ("Proposed Decision") on the Minnesota Technical Reference Manual ("TRM") Version 5.0 ("TRM 5.0") for Energy Conservation and Optimization ("ECO") programs filed on October 29, 2025.

Please contact me at (218) 355-3158 or hmitchell@mnpower.com with any questions related to this filing.

Respectfully Submitted,



Hannah Mitchell
Public Policy Advisor
Minnesota Power
30 West Superior Street
Duluth, MN 55802

HM:ah
Attach.

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA DEPARTMENT OF COMMERCE**

In the Matter of the Minnesota Technical
Reference Manual Version 5.0

Docket No. E,G999/CIP-18-694

REPLY COMMENTS

I. INTRODUCTION

On October 29, 2025, the Department of Commerce, Division of Energy Resources (“Department”) issued a proposed decision (“Proposed Decision”) on the Minnesota Technical Reference Manual (“TRM”) Version 5.0 (“TRM 5.0”) for Energy Conservation and Optimization (“ECO”) programs in Docket No. E,G999/CIP-18-694. In the filing, the Department established a regulatory timeline, with initial comments due on November 20, 2025, and Reply Comments due on December 8, 2025. The Department later modified the timeline in its filing on December 4, 2025, to extend the Reply Comment due date to December 15, 2025. On November 20, 2025, Minnesota Power (or, the “Company”) joined several other utilities in filing joint comments on the Proposed Decision. The Minnesota TRM is a valuable resource that enables easier program development, approval, and implementation. Minnesota Power was grateful to join other utilities in unified joint comments on such an important component of ECO regulation.

Some utilities also filed individual initial comments in addition to the joint comments on November 20, 2025. Minnesota Power appreciates other utilities’ thoughtful initial comments and respectfully submits the enclosed Reply Comments.

II. REPLY COMMENTS

In the Proposed Decision, the Department included a Residential Hot Water – Desuperheater measure (“desuperheater measure”) to be included in the TRM 5.0. Minnesota Power agrees with the recommendation in initial comments to increase the proposed desuperheater measure life to 25 years to match the ground source heat pump (“GSHP”) measure life. The Company also agrees that the example provided for the desuperheater measure in the Proposed Decision could use clarification.

Additionally, there was discussion in initial comments regarding whether the desuperheater measure should be eligible to be considered Efficient Fuel Switching (“EFS”). Minnesota Power believes that EFS savings should be allowed to be attributed to a desuperheater installed with a GSHP to offset gas or oil consumption. The Company included desuperheaters as a measure in the Company’s recently submitted request to modify the 2024-2026 Triennial based on the Illinois TRM GSHP measure, which attributes EFS savings to desuperheaters installed with GSHPs. The installation of a GSHP with a desuperheater, as a system, increases electricity consumption while decreasing baseline fuel consumption. The desuperheater deepens the energy savings of a GSHP alone, which further decreases source energy and greenhouse gas (“GHG”) emissions reductions, as well as adds energy savings and an additional incentive opportunity for the customer. This measure aligns with the intention of the ECO Act’s description of EFS,¹ is in the best interest of utility customers and the state’s source energy and carbon reduction goals, and would be a valuable addition to the Minnesota TRM.

III. CONCLUSION

Minnesota Power appreciates the Department’s work in developing the Proposed Decision as well as the collaboration and additional comments submitted by other parties during the comment period, and the Company is grateful for the opportunity to respond.

Please contact me at (218) 355-3158 or hmitchell@mnpower.com with any questions related to this filing.

Dated: December 15, 2025

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Hannah Mitchell".

Hannah Mitchell
Public Policy Advisor
Minnesota Power
30 West Superior Street
Duluth, MN 55802

¹ Energy Conservation and Optimization Act of 2021 in Laws of Minnesota 2021, Chapter 29.

STATE OF MINNESOTA)
)ss
COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

I, Amy M. Honkala of the City of Duluth, County of St. Louis, State of Minnesota, hereby certify that on the 15th day of December, 2025, I electronically filed a true and correct copy of Minnesota Power's **Reply Comments in Docket No. E,G999/CIP-18-694** on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on eDocket's Official Service List for this Docket were served as requested.



Amy M. Honkala