

May 15, 2024

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

RE: Docket No. 23-215: In the Matter of CenterPoint Energy’s Natural Gas Innovation Plan

Dear Mr. Seuffert:

The City of Minneapolis (“Minneapolis”) submits these Supplemental Comments regarding the CenterPoint Energy Petition for Approval of its Natural Gas Innovation Plan (“Plan”) filed June 28, 2023.¹ Minneapolis appreciates the thoughtful Comments and Reply submitted by the Company and other parties. After reviewing the record to date, we provide updates to our Initial Comments.

I. Minneapolis recommends approval with Modifications

Minneapolis continues to recommend approval of the Plan with modifications. Our positions remain the same from our Initial Comments except as described in section III.

II. CenterPoint’s Concerns and Recommendations Regarding the City of Minneapolis’ Analysis

CenterPoint noted that Minneapolis prioritized four objectives in our analysis, including greenhouse gas reductions, cost-effectiveness, improving affordability, and health and equity.²

Specifically, we stated in Initial Comments:

When evaluating the NGIA Plan, our initial analysis focuses on whether a pilot:

- *Demonstrates the potential to lead to significant progress in reducing the climate impacts of CenterPoint operations in Minnesota in the near- to medium-term, consistent with the statutory goal to reduce economy-wide GHG emissions to net zero by 2050 as compared to 2005 levels with interim targets of:*
 - o 30 percent by 2025 and
 - o 50 percent by 2030

¹ Docket No. E002/CN-23-215. Petition by CenterPoint Energy for Approval of its First Natural Gas Innovation Plan. Jun 28, 2023.

² CenterPoint Energy Reply Comments. Mar. 15, 2024. p. 5.

- Holds promise to be cost-effective (i.e. at scale, costs are in-line with the program benefits)
- Will positively impact comfort and affordability for customers
- Is likely improve health and equity for CenterPoint customers³

The Company acknowledged these are important considerations but recommended “the Commission should focus on the statutorily-specified criteria and the frameworks approved in the Commission’s June 1, 2022 Order in Docket No. G-999/CI-21-56615 in evaluating the Company’s Plan.”⁴

While affordability along with health and equity are general priorities associated with utility regulation, state greenhouse gas (“GHG”) reduction goals and guidance about cost-effectiveness are taken directly from the NGIA statute:⁵

(b) The commission must approve, modify, or reject a plan. The commission must not approve an innovation plan unless the commission finds:

(7) the total amount of estimated greenhouse gas emissions reduction or avoidance to be achieved under the plan is reasonable considering the state's greenhouse gas and renewable energy goals, including those established in section [216C.05, subdivision 2, clause \(3\)](#), and section [216H.02, subdivision 1](#); customer cost and the total amount of greenhouse gas emissions reduction or avoidance achieved under the utility's previously approved plans, if applicable

And Order Point 38⁶ requires utilities to consider all four of these public interest priorities:

Utility innovation plan filings shall include:

- a. An assessment of impacts on local communities in and around proposed project sites and a summary of outreach/community workshops held for pilots designed to reach low- and medium-income customers;*⁷
- b. A discussion of expectations for program access and types of customers that may participate;*
- c. A discussion of how equity and diversity was or will be considered in the program design process and any utility vendor/supplier selection processes;*
- d. The most recent metrics filed under the Commission’s January 7, 2020, Order of Service Quality Reports in Dockets No. G-004/M-19-280, G-008/M-19-300, G-011/M-19-303, G-002/M-19-304, and G-002/M-19-305; and*
- e. A nontechnical summary describing how the innovation furthers the state’s*

³ City Comments. Jan. 16, 2024. p. 1-2.

⁴ CenterPoint Reply Comments. March 15, 2024. p. 5.

⁵ Minn. Stat. § 216B.2427 Subd.2 (a) and (b)

⁶ Docket No. G-999/CI-21-566. *Order 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.* June 1, 2022. p. 21.

⁷ Consideration of health impacts is inferred in 38a.

greenhouse gas emissions reduction and renewable energy goals, the process and analytical techniques used to create the plan, percentage greenhouse gas emission reductions through the plan, all projects proposed and considered by the utility ranked in order of cost per ton of avoided greenhouse gas emissions, costs and activities required over the next five years to implement the plan, the likely effect of plan implementation on gas rates and bills, and local economic development and future innovation associated with the plan.

In addition to Order Point 38, the Commission Order requires analysis, metrics, and reporting for an NGIA plan related to GHG emissions and intensity; cost effectiveness; and affordability.⁸

In summary, Minneapolis views our analysis as consistent with both statute and the Commission's Order governing the development of NGIA Plans. We are supportive of most of the pilots within the proposed Plan and understand that some measures that are not cost effective today may warrant piloting within the overall plan if they hold promise to reduce GHG intensity of the Company's heating system at scale.

III. Updated Positions in Response Other Parties' Comments

A. Pilot A Budget Reallocation to Pilot C.

After Hennepin County withdrew plans to pursue anaerobic digestion, the Company proposed to reallocate the funds intended for Pilot A to Pilot C for a general Renewable Natural Gas Request for Proposal.⁹ Minneapolis shares the concern raised by CUB that the Company relies on Pilot C to achieve a spending level that meets the 50 percent requirement in statute for the overall Plan.¹⁰ We agree with the Clean Energy Organizations ("CEOs") that the Company has not demonstrated that the lifetime budget of \$67 Million for Pilot C is reasonable.¹¹

Minneapolis agrees that a more reasonable approach would be for the Commission to approve a modified plan that eliminates or lowers the approved costs for some pilots so that the 50 percent requirement is met at a lower, overall budgeted cost for the full NGIA Plan.¹²

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

Minneapolis agrees with the recommendation from the CEOs in Reply Comments:

We...recommend that Pilot N not be limited to hybrid heating systems and that it prioritizes investments in electric heating equipment rather than the installation of new gas backup equipment in hybrid heating systems.¹³

⁸ Order Points 26, 27, 29, 30, 31, 33, 35, and 36 and others from Docket No. G-999/CI-21-566.

⁹ Docket No. G-008/M-23-215 CenterPoint Energy REPLY COMMENTS In the Matter of the Company's First Natural Gas Innovation Act ("NGIA") Innovation Plan. March 15, 2024. p.35.

<https://www.edockets.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={60DF438E-0000-C87F-90F2-20D024BD3E85}&documentTitle=20243-204399-04>

¹⁰ Citizens Utility Board Reply Comments. March 15, 2024. p. 6.

¹¹ Clean Energy Organizations Initial Comments. Jan. 16, 2024. p. 22-24.

¹² *Id.* p. 5.

¹³ CEOs Reply Comments. March 15, 2024. p.3

C. CenterPoint's Request to Spend Up to 25 Percent More Than Budgeted

Minneapolis took the position in Initial Comments that budget variances of up to five percent may be warranted for pilots with higher-than-expected expenditures without seeking additional approval from the Commission.¹⁴ In reviewing the comments of other parties, including concerns that the request does not comply with the text of the statute,¹⁵ we support the recommendation that adjustments to pilot budgets should be pursued and evaluated through the modification process already established by the NGIA statute.¹⁶

IV. Conclusion

Minneapolis appreciates the significant work that has gone into the development of the Evaluation Framework, CenterPoint's Proposal, and the efforts of various parties. We thank the Commission for consideration of our Supplemental Comments.

Respectfully submitted,



Kim W. Havey (He/Him)
Division Director
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¹⁴ Minneapolis Comments. Jan 16, 2024. p. 9.

¹⁵ Office of the Attorney General Comments. Jan. 12, 2024. p. 9-10.

¹⁶ Citizens Utility Board Comments. Jan. 15, 2024. p.11

STATE OF MINNESOTA)

) ss. **CERTIFICATE OF SERVICE**

COUNTY OF HENNEPIN)

I, Stacy A. Miller, of the City of Minneapolis, County of Hennepin, State of Minnesota, affirm that on the 15th day of May 2024, I served a copy of the following via e-mail and/or via U.S. Mail:

SUPPLEMENTAL COMMENTS OF THE CITY OF MINNEAPOLIS REGARDING DOCKET NO. 23-215

at the last known mailing addresses and email addresses of said entities/individuals on the attached Service List. If by U.S. Mail, I placed said document in postage prepaid envelope and placed same in the U.S. Post Office in Minneapolis, Minnesota for delivery by the United States Postal Service.



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