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March 17, 2026

via eFiling

Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

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

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

REPLY COMMENTS

Dear Ms. Bergman:

CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint" or the "Company") respectfully submits these Reply Comments in response to the Minnesota Public Utilities Commission's (the "Commission") January 30, 2026 Notice of Comment Period and parties' March 3, 2026 initial comments discussing the Company's request to increase the budget one of its Natural Gas Innovation Act ("NGIA") Innovation Plan pilots – Pilot D: Green Hydrogen Blending into Natural Gas Distribution System.

The Company's request for a budget modification for Pilot D reflects cost increases driven by changing market conditions for labor, materials, and critical equipment, as identified in a Front-End Engineering Design ("FEED") study prepared by Standby Systems ("Standby"). The FEED study estimated that Pilot D's capital costs would exceed initial projections by approximately \$2.4 million, reflecting a 10 percent increase to Pilot D's five-year plan budget, with an estimated range of accuracy of plus or minus 25 percent.

The Company's budget modification proposal consisted of an initial budget request, and an additional contingency budget request intended to account for the full range of uncertainty identified through the FEED study and reduce the likelihood of future budget modification requests. The proposed budget modification does not increase total NGIA Plan costs beyond statutory caps. Instead, the Company's request reallocates funds within the approved Plan in support of Pilot D.

The NGIA is designed to provide gas utilities with a structured opportunity to explore innovative technologies and approaches that may not yet be fully mature or cost effective but could play an important role in future decarbonization efforts. Through its approved NGIA Plan, the Company seeks to test a diverse set of resources, designs, and delivery methods to generate learnings that can inform broader implementation.

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CenterPoint Energy continues to see value in Pilot D as a means of gaining firsthand experience with hydrogen production, on-site renewable electricity, hydrogen blending, and hydrogen storage and use. While hydrogen presently represents a higher-cost decarbonization pathway, the NGIA is structured to encourage early market development for emerging technologies to reduce costs over time and assess their viability for broader application. Hydrogen blending has the potential to deliver meaningful greenhouse gas reductions while advancing broader operational and system-level learnings. For these reasons, the Company continues to recommend the Commission approve its proposed budget modification for Pilot D.

If you have questions, please contact me at trey.harsch@centerpointenergy.com or 612-321-5191.

Sincerely,

/s/ Trey Harsch
Manager, Regulatory Affairs

Attachments

C: Service List

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

Katie J. Sieben	Chair
Joseph K. Sullivan	Vice Chair
Audrey Partridge	Commissioner
Hwikwon Ham	Commissioner
John A. Tuma	Commissioner

In the Matter of CenterPoint’s Natural Gas
Innovation Plan

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

REPLY COMMENTS

I. INTRODUCTION

CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas (“CenterPoint Energy” or the “Company”) respectfully submits these Reply Comments in response to the Minnesota Public Utilities Commission’s (the “Commission”) January 30, 2026 Notice of Comment Period and parties’ initial comments discussing the Company’s request to increase the budget of one of its Natural Gas Innovation Act (“NGIA”) Innovation Plan pilots – Pilot D: Green Hydrogen Blending into Natural Gas Distribution System.

On January 22, 2026, the Company requested the Commission approve a budget modification for Pilot D that would increase the Pilot’s five-year plan budget. Through its filing, the Company explained that a Front-End Engineering Design (“FEED”) study conducted by the Company’s vendor – Standby Systems (“Standby”) – estimated that Pilot D’s capital costs would exceed the Company’s initial estimates, increasing by \$2.4 million, reflecting a 10 percent increase to Pilot D’s five-year plan budget. The FEED study’s cost estimate included a plus or minus 25 percent range of accuracy, placing the full range of estimated capital cost between \$5.9 million and \$9.2 million.

The Company’s proposed five-year plan budget modification was broken into two parts:

1. An initial budget increase request of \$468,412; and
2. A contingency budget increase request of \$935,972 intended to encompass the FEED study’s full range of accuracy.

Taken together, these requests represent a \$1,404,384 increase to Pilot D’s five-year plan budget (approximately 10 percent). For Pilot D to proceed without approval of the Company’s budget modification request, the inclusion of major aspects of the pilot would need to be reevaluated for the Pilot to stay within budget – including the on-site solar and/or hydrogen storage.

Since the NGIA Plan is subject to a statutory cost cap, increasing Pilot D's budget requires funds to be shifted to Pilot D from elsewhere in the Plan. The Company proposed two funding sources from within the NGIA Plan that could be leveraged in support of Pilot D:

1. The Renewable Natural gas ("RNG") Request for Proposals ("RFP") Pilot ("Pilot C"), which has seen some of its anticipated costs shift outside the 5-year innovation plan period due to later-than-anticipated construction timelines for RNG facilities; or
2. The Company's reserve research and development ("R&D") funding, which is currently not attached to any particular project but is intended to be used for yet-to-be-proposed R&D projects.

The Company stated its preference would be for the additional Pilot D funds to come from Pilot C. This approach ensures continued compliance with NGIA's statutory requirement that at least 50 percent of plan expenditures be directed to alternative fuel projects and leaves the reserve R&D funding available for yet-to-be-proposed R&D projects or as support for non-alternative fuel pilots – should such support ever be necessary.

Although the Commission granted limited budget flexibility for certain pilot modifications, the proposed budget modification for Pilot D does not qualify under those provisions.¹ As a result, the Company was required to request formal review and approval.

The Company's request was also made in compliance with the Commission's November 13, 2025 Order,² which required the Company to produce a filing in the event that the beginning-of-construction or in-service dates for either the electrolyzer or solar array components of Pilot D were delayed in any way that may jeopardize the receipt of expected federal tax credits.³ The Company prefers certainty to move forward with Pilot D as initially proposed pursuant to the revised budget and, as detailed in the Company's January 22, 2026 filing, delays in approval of the modified budget would jeopardize CenterPoint Energy's ability to secure available federal tax benefits.⁴ As a result, the Company was prompted to submit a filing to the Commission.

On January 30, 2026, the Commission issued a Notice of Comment Period requesting comments on:

- Whether the Commission should approve, modify, or deny the Company's budget modification request;
- Where funds should be taken from elsewhere in the plan to support Pilot D; and
- Whether Pilot D's updated five-year budget is reasonable.

On March 3, 2026, the Department of Commerce (the "Department"), the Office of the Attorney General—Residential Utilities Division ("OAG"), the Citizen's Utility Board of Minnesota ("CUB") and Fresh Energy provided initial comments. Through their comments, parties offered mixed support for the Company's request. The Department and the OAG supported the Company's initial budget increase request, but did not agree on where within the Company's plan funds should be moved from to support Pilot D. CUB and Fresh Energy opposed the continuation of

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, Order Paragraph 26 (Oct. 9, 2024).

² *In the Matter of CenterPoint Energy's Natural Gas Innovation Plan*, Docket No. G-008/M-23-215, Order (Nov. 13, 2025).

³ *Id.*, Order Paragraph 2.

⁴ To secure the anticipated solar ITCs, the Company must establish that construction of the on-site solar generation began before July 4, 2026.

Pilot D. However, CUB noted that if the Commission were to approve any part of the Company's request, it should only approve the Company's initial budget request. Parties also expressed concern about Pilot D's cost effectiveness under updated budget assumptions and the reliability of the Company's initial planning and assumptions and re-raised broader concerns about the practice of blending hydrogen into the distribution system.

Through these reply comments, CenterPoint Energy addresses parties' initial comments and provides the additional data and analysis requested by parties. The Company does not re-address the concerns raised by CUB and Fresh Energy about the practice of hydrogen blending. These concerns were already fully considered at the time the Commission approved the Company's plan, with the Commission ultimately concluding:

The Commission understands commenters' concerns about Pilot D but is persuaded that the pilot should be approved. Pilot D presents an opportunity for CenterPoint to learn more about blending hydrogen with natural gas at a facility that is being powered, at least in part, by onsite renewable energy. CenterPoint expects the reduction in geologic gas throughput and GHG emissions to be significant, which furthers the goals of the NGIA. With the experience CenterPoint has already gained from operating its existing hydrogen blending facility, the new facility under Pilot D is more likely to be successful and provide even more learning opportunities. CenterPoint should further explore implementing this innovative technology.⁵

For the same reasons, the Company does not re-address comments regarding the existence of the Company's Minneapolis Hydrogen Blending project. In approving Pilot D, the Commission was aware of and considered the existence of the Company's existing hydrogen blending project in Minneapolis.

The NGIA is a vital tool for innovation. Through its approved NGIA Plan, the Company intends to maximize opportunities to test a variety of innovative resources, designs, and delivery approaches that could help provide a roadmap for wider-reaching programming. In developing its NGIA Plan, the Company endeavored to remain open to novel technologies and concepts at various stages of market viability, recognizing that the energy transition likely will require a variety of technologies and novel approaches, including technologies and approaches that are not fully developed today.

The Company continues to see value in Pilot D and remains committed to the exploration of hydrogen as a decarbonization resource through its NGIA Plan. Pilot D provides the Company with a firsthand learning opportunity in the operation of hydrogen production and on-site renewable electricity, hydrogen blending, and the storage and use of stored hydrogen.

The NGIA was designed explicitly to provide a space for gas utilities to invest in and explore innovative decarbonization solutions that may not be considered cost effective through other venues such as Minnesota's Energy Conservation and Optimization ("ECO") programs but may still have immense potential to reduce greenhouse gas emissions in the future.

The potential value of hydrogen blending to decarbonization remains substantial. At a five percent blend into CenterPoint's entire distribution system, hydrogen could replace

⁵ *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 at 9 (Oct. 9, 2024).

approximately 2.5 million Dth of geologic natural gas consumption annually and reduce GHG emissions by approximately 165,000 metric tons CO₂e – on par with the annual GHG savings achieved by the Company through ECO.⁶ However, hydrogen’s potential goes beyond blending. The learnings generated from Pilot D will inform the Company’s future work with hydrogen and will give the Company the experience needed to educate and support customers exploring hydrogen as a decarbonization tool for their own operations. The inclusion of hydrogen storage with Pilot D opens additional opportunities to explore different ways stored hydrogen can be used to further support the Company’s decarbonization efforts.

The impact of the Company’s investments in innovative technologies on customers is controlled by the NGIA through cost caps applied to the plan as a whole.⁷ Because any on-going costs associated with pilots in the Company’s first NGIA Plan will be tracked in, and will count against the budgets of, future NGIA plans, the total impact of the Company’s NGIA investments on customers will never exceed statutory cost caps placed on any individual NGIA plan. In this way, NGIA-related costs, including the Company’s Pilot D budget modification, are ultimately controlled by the statutory limitations placed on NGIA plan budgets.

The Company continues to support Pilot D and recommends the Commission approve its proposed budget modification request. In the sections below, the Company addresses parties’ initial comments and provides the additional information requested by parties.

II. PILOT D BUDGET REQUESTS

In its Initial Comments, CUB noted that the Company had not identified concerns to suggest that it would be unable to meet solar Investment Tax Credit (ITC) ITC deadlines if the Commission were to grant only its initial budget request.

CenterPoint Energy affirms that its initial budget request would provide the necessary financial certainty to proceed with the investments required to secure the anticipated solar ITCs. However, the initial budget request alone does not account for the full extent of potential costs identified by the FEED study. Approval of the requested contingency funding ensures Pilot D is adequately resourced and would allow for the Company to address unforeseen expenses encompassed by the FEED study’s plus or minus 25 percent range of accuracy. The intent of the Company’s budget modification request is to ensure Pilot D is fully funded based on available information and reduce the need for future budget modification requests associated with this Pilot.

For Pilot D to proceed without approval of the Company’s budget modification request, the inclusion of major aspects of the pilot would need to be reevaluated for the Pilot to stay within budget – including the on-site solar and/or hydrogen storage.

If the Commission approves the Company’s full budget modification request, including the contingency amount, the Department recommended that the Commission require the Company to report on the use of the contingency portion of Pilot D’s budget and to provide evidence of cost increases beyond the Company’s control.⁸ CenterPoint Energy does not object to these

⁶ The average annual savings in the Company’s 2024-2026 Energy Conservation and Optimization Triennial Plan is approximately 1.9 million Dth or 125,000 MTCO₂e.

⁷ Minn. Stat. § 216B. 2427, Subd. 3.

⁸ Department Initial Comments, p.5.

reporting requirements should the Commission approve the full budget request. However, the Company respectfully requests that the Commission specify that such reporting will be incorporated into the Company's annual NGIA status reports.

In its initial Comments, the OAG compared Xcel Energy's ("Xcel") approved NGIA pilot project contingency budgets against the Company's proposed Pilot D budget modification, noting that Xcel's contingency budgets ranged from 10.3 to 26.3 percent and that by approving the Company's Pilot D budget request the Commission would be, "signaling it would approve a 100% increase over the initial estimate, rather than the 47% increase that CenterPoint signals in its filing."⁹

The Company notes that through these comments the OAG is not making an equivalent comparison across the Company's and Xcel's NGIA plans. Xcel's approved budget for its Sherco 5MW hydrogen electrolyzer pilot project was \$7,890,000. This budget included an approved \$2,078,100 contingency, which equals roughly 26.3 percent of the pilot's five-year plan budget – as referenced by the OAG through its initial comments.¹⁰

The 47 percent value referenced by the OAG regarding CenterPoint Energy's Pilot D budget request was specifically referencing the project's capital costs.¹¹ An equivalent analysis would review the percentage of five-year plan costs that could be considered a "contingency." Pilot D's approved five-year budget for Pilot D is \$4,646,943. The Company's full budget modification request would add an additional \$1,404,384 to Pilot D's budget. If approved, Pilot D's new budget would be \$6,051,327, of which 23.2 percent would be a "contingency" – in this instance, the Company uses the term "contingency" conservatively to include both aspects of the Company's budget modification request.

Based on this analysis, Pilot D's proposed budget and the percent of that budget that could be considered as a "contingency" is comparable to other similar projects approved by the Commission through the NGIA. As a result, the OAG's suggested comparison to Xcel's approved contingency provides further support for approval of the proposed budget modification in full, rather than supporting rejection as suggested by the OAG.

III. PILOT D INITIAL COST ESTIMATES AND EXPLORATION OF A "PACKAGED" ELECTROLYZER SYSTEM

In its initial Comments, the OAG questioned actions taken by the Company in preparing its initial budget estimates for Pilot D, including the Company's exploration into the use of a "packaged" electrolyzer system, the lack of specific quotes for such a "packaged" system, and the Company's evaluation of winterizing such systems.¹²

The Company appreciates the OAG's comments and provides additional context below regarding the process used in developing Pilot D.

⁹ OAG Initial Comments, p.6.

¹⁰ Illustrated in Table 12 of Commission Staff's February 6, 2025 Briefing Papers in Docket No. G-002/M-23-518.

¹¹ CenterPoint Energy Budget Modification and Compliance Filing, p.5, Table 1.

¹² OAG Initial Comments, pp.2-5.

As part of the planning process for Pilot D, CenterPoint engaged Standby to produce a technical memo in early 2023 that included a preliminary capital cost estimate for the pilot. CenterPoint had previously engaged Standby to help develop and operate its Minneapolis green hydrogen facility, which began operations in 2022. At the time of pilot planning, the green hydrogen industry was highly nascent and fortunately, the Minnesota-based business, Standby possessed unique technical expertise that made it highly qualified to evaluate the technical and financial needs of the future pilot. This expertise also enabled Standby to assess emerging trends and technologies in the green hydrogen space that could be incorporated into the pilot, which was still several years from planned development.

One such trend was the emergence of “packaged” electrolyzers, which are electrolyzers with all equipment pre-assembled in modular systems. At the time of the 2023 memo, most packaged electrolyzer systems were still in development and had not yet reached the market. However, manufacturers were projecting packaged units to be available by the time the pilot began development. These packaged systems were expected to offer several advantages over custom-built systems, such as improved cost effectiveness and easier installation, making them an innovative option to explore for the pilot project. Having first-hand experience developing a custom-built system at the Minneapolis facility, Standby possessed a unique technical expertise to evaluate potential benefits and drawbacks of a packaged system compared to a custom-build.

In evaluating the potential of packaged units for the future pilot project, Standby consulted manufacturers to evaluate the technical and economic feasibility of the units. Due to the rapidly developing nature of this fledgling market, manufacturers were found to be highly protective of their units’ economic data. Standby found that manufacturers were willing to provide high-level cost estimates for their systems based on projections of future market conditions but avoided providing direct quotes. This was a consequence of working with nascent technologies in a rapidly changing environment, and not due to a lack of effort, technical expertise, or preparation. Standby’s experience with the Minneapolis facility ultimately allowed them to make a critical evaluation of the available pricing information and supplement this information with past project experience and general industry knowledge to develop a reasonable preliminary cost estimate for the system.

Additionally, Standby’s prior work with the Minneapolis facility provided it with firsthand knowledge of the technical requirements needed to operate effectively in Minnesota’s climate. Through consultation with manufacturers at the time of the 2023 memo, Standby found that current packaged systems were not designed to accommodate Minnesota’s climate conditions and would require additional weatherization. However, based on those discussions with packaged system manufacturers, it was understood that suitable packaged solutions were expected to become available by the time the pilot began development. This would provide a significant advantage over custom-built units, as a properly weatherized packaged unit would not be required to be housed in heated structures for winter operation, providing cost savings. A deep engineering assessment to evaluate the feasibility of winterizing then-available packaged systems was not practicable, since manufacturers maintained key technical information as proprietary, preventing a more refined analysis prior to commission approval.

The cost estimate presented in the 2023 memo, which served as the basis for Pilot D’s initially filed budget, was based on then-available industry projections for a highly nascent green hydrogen market with a rapidly evolving technical outlook. To address this uncertainty, Standby consulted with relevant industry stakeholders and leveraged its experience with the Minneapolis

facility, along with broader industry knowledge. At the time the memo was prepared, Standby reasonably concluded that a packaged system approach would allow CenterPoint Energy to most effectively pursue innovative learnings and cost-effective greenhouse gas reductions by the time the pilot began development.

CenterPoint Energy recognizes the importance of producing accurate pilot budget estimates for NGIA pilots and, during plan development, relied on the best available cost information and engineering assumptions. With respect to Pilot D, the initial estimates reflected what was known at that time. Importantly, further diligence would have been unlikely to yield greater certainty as to the ultimate development trajectory of packaged, weatherized systems, which continued to evolve between plan approval and implementation. This evolution was particularly impacted by the change in focus of the federal administration between 2023 and 2025, which shifted the green hydrogen industry's focus towards meeting the needs of the European market rather than those of the US.

Additionally, the Company appropriately considered plan-level development costs, which are recovered through the approved NGIA Plan and affect overall pilot budgets. To avoid imposing significant planning costs on other pilots in the event a proposal was not approved, more resource-intensive activities—such as Pilot D's FEED study and Pilot I's site selection and feasibility analysis—were deferred until after Commission approval. Further, undertaking a complete FEED study at the plan-development stage would not have been reasonable; any FEED study performed then would have been based on incomplete vendor and market information and likely required substantial re-work as market conditions and equipment availability evolved.

The Company appreciates the OAG's recommended additions for future NGIA pilots involving capital projects. However, in light of the considerations described above, the Company does not believe the OAG's proposal would have significantly affected the planning process for Pilot D. As explained, Pilot D's estimates were appropriately developed using the best available information at the time, with more detailed, vendor-specific analysis and engineering deferred until after Commission approval. Given the nascent and rapidly evolving nature of the green hydrogen market during plan development, imposing FEED-level requirements at that stage would have been unlikely to yield greater certainty as to the ultimate development trajectory of packaged, weatherized systems and may have prematurely constrained the consideration of emerging packaged system options. Further, applying those requirements across-the-board in future plan filings would not necessarily be reasonable as the timing and usefulness of such analyses depend on project maturity, vendor data access, and evolving market conditions. The fact that Pilot D's budget has increased since plan approval is not a failure of the budget process; it reflects the realities of advancing innovative, rapidly evolving technologies under the NGIA.

The Company will continue to take appropriate steps to ensure NGIA Plan budget forecasts are grounded in the most accurate and current data, including transparent updates as projects mature and clear sequencing of engineering activities. That said, there will be factors such as inflation, labor and materials markets, and vendor product evolution, that cannot be fully known at plan development and will continue to evolve between approval and implementation. In some cases, a secondary approval may be warranted and appropriate—such as the Commission's review of Pilot I's site-suitability study or this request for approval of a budget modification. In other cases, it may be more appropriate to address such uncertainties through clear sequencing of engineering activities and calibrated contingencies (similar to the contingency structures the

Commission has approved in other NGIA filings), paired with transparent updates as projects mature. This approach preserves approval certainty while ensuring the Commission and parties receive the best available information.

IV. IMPACTS OF PILOT REJECTION

Both CUB and Fresh Energy recommended the Commission eliminate Pilot D rather than approve the Company's proposed budget modification, asserting that similar learnings can be obtained from existing hydrogen efforts and that the pilot's projected costs outweigh its emissions-reduction benefits relative to other NGIA options. As discussed above, the Commission considered these same concerns when it approved Pilot D and determined that the Company should further explore implementation of this innovative technology. The proposed budget modifications do not support abandoning that conclusion. Pilot D continues to offer a valuable opportunity to advance learnings on hydrogen blending and on-site renewable energy, including real-world insights into design, integration, operations in Minnesota climate conditions, and portfolio interactions with other NGIA resources. Pilot D also provides public-interest benefits including the creation of high-quality jobs and training opportunities and natural gas throughput and emissions reductions.

Fresh Energy acknowledges that "early investment in green hydrogen may contribute to technology learning, supply chain development, and broader market formation," but nevertheless concludes "blending hydrogen into the residential gas distribution system represents one of the highest-cost and least scalable emissions-reduction pathways in the NGIA portfolio." The Commission has recognized that NGIA pilots exist to test emerging options and that effectiveness will be proven over time as experience accumulates.¹³

Further, eliminating Pilot D would also raise questions regarding compliance with the NGIA's requirement that at least 50 percent of approved costs be dedicated to alternative fuels. As the Department notes, "[t]he Minnesota statute governing the NGIA plan, Minn. Stat. § 216B.2427, requires that "50 percent or more of the utility's costs approved by the Commission for recovery under the plan are for the procurement and distribution of renewable natural gas, biogas, hydrogen produced via power-to-hydrogen, and ammonia produced via power-to-ammonia." By requiring that at least 50 percent of initial NGIA investments be directed to alternative fuels, the Legislature signaled a clear priority for advancing clean, drop-in fuel solutions that can reduce the carbon intensity of geologic natural gas—supporting continuation of Pilot D and approval of the proposed budget modification.

In support of eliminating Pilot D, Fresh Energy references ongoing affordability pressures affecting Minnesota households.¹⁴ As discussed in the Company's January 22, 2026 request and detailed above, the Company is mindful of customer bill impacts, and the proposed budget modification for Pilot D will not result in increased bill impacts. By reallocating approved NGIA spending from Pilot C or the R&D reserve, overall customer bill impacts remain unchanged.

¹³ *In the Matter of CenterPoint Energy's Natural Gas Innovation Plan*, Docket No. G-008/M-23-215, Order Denying Reconsideration (Jan. 13, 2025) ("The NGIA encourages gas utilities to explore ways to help Minnesota meet its greenhouse gas and renewable energy goals. . . It will take time to determine which pilots will materially contribute to decarbonizing the natural gas sector, and the Commission anticipates that plans will become more effective over time as utilities learn more through implementation.").

¹⁴ Fresh Energy Initial Comments, p.7.

Moreover, the impact of NGIA costs on ratepayers is statutorily capped, and the proposed budget modification does not increase NGIA costs beyond the total Plan expenditures already approved by the Commission. As detailed in the Company's filing, the impact of the modification is further moderated by improved estimates for federal production tax credits associated with hydrogen production and by the updated implementation schedule, both of which temper rate impacts. Further, the Company has committed to ensuring that on-going costs associated with its NGIA Plans are tracked and accounted for in future plans, ensuring that all NGIA-related costs continue to be controlled by statutory cost constraints.

V. SOURCE OF FUNDING TO COVER PILOT D BUDGET INCREASE

In their initial comments, the Department and the OAG expressed differing views regarding the appropriate funding source to support Pilot D. The Department¹⁵ supported the Company's preferred approach of reallocating funds from Pilot C's budget, while the OAG¹⁶ suggested that funds should be shifted from the reserve R&D budget.

As noted in the introduction to these Reply Comments, because the Company's NGIA plan budget is capped under statute, additional funding allocated to Pilot D must come from elsewhere within the NGIA Plan. In its January 22, 2026 filing, the Company proposed both Pilot C and the reserve R&D budgets as available options for supporting Pilot D. However, the Company continues to prefer the use of Pilot C funding, as these funds were already designated for use in alternative fuel pilots and to count toward the 50 percent threshold. This approach would allow the reserve R&D funding to remain available for yet-to-be-proposed R&D projects or as support for non-alternative fuel pilots.

VI. THE COMPANY'S \$200/MTCO₂e COST-EFFECTIVENESS OBJECTIVE

In its initial comments, Fresh Energy cites the Company's Commission-approved cost effectiveness objective of achieving GHG savings across all pilots at a cost of no more than \$200/MTCO₂e.¹⁷ Fresh Energy compared the dollar per MTCO₂e savings of Pilot D against the Company's objective, stating that the Pilot's relatively high \$/MTCO₂e saved ratio was reason enough for the Commission to reject the Company's budget modification request unless the Company was able to "demonstrate that Pilot D remains competitive within the NGIA portfolio under updated assumptions."¹⁸

CenterPoint Energy provides the data requested by Fresh Energy in the sections below, but notes that Fresh Energy has already concluded that Pilot D's budget – prior to any modification – was not competitive based on a dollars-per-ton metric.¹⁹ The Company disagrees that evaluation of a single pilot against one cost effectiveness objective supports discontinuing an approved pilot. Further, the Company does not anticipate the proposed budget modification for

¹⁵ Department of Commerce Initial Comments, p.8.

¹⁶ OAG Initial Comments, pp.7-8.

¹⁷ The referenced objective is the first of the Company's "perspectives" objectives (Perspective Objective #1). The Company's cost-effectiveness objective categories were based on the categories of costs and benefits identified in the Commission's Framework Order (June 1, 2022 Order in Docket No. G-999/CI-21-566).

¹⁸ Fresh Energy Initial Comments, pp.3-4.

¹⁹ Fresh Energy Initial Comments, p. 2 and 6.

Pilot D to hinder its ability to successfully achieve the cost-effectiveness metric that overall GHG savings achieved by all approved pilots is achieved at a cost of no more than \$200/ MTCO₂e.

The cost-effectiveness objective cited by Fresh Energy is one of thirteen approved objectives that the Commission will ultimately evaluate holistically to determine whether CenterPoint Energy will be permitted to increase its overall NGIA spending cap in a future NGIA plan.²⁰

Consistent with the NGIA statute,²¹ the approved cost effectiveness objectives are at the scale of the NGIA Plan and thus take into consideration the achievement of multiple pilot projects, recognizing that some pilots may be stronger in certain areas than others. The approved cost-effectiveness objectives are designed to work in tandem to ensure the Company's NGIA plan as a whole succeeds in achieving the various objectives of the NGIA statute. Under an approved plan, the Company is incentivized to act prudently and work toward the achievement of established plan objectives because successful achievement of the cost-effectiveness objectives results in an increased NGIA budget for future plans.²²

As reflected in the approved cost-effectiveness metrics for the plan, for purposes of the dollars-per-ton metric, costs are measured on a lifetime basis using the utility cost test and GHG savings are also measured on a lifetime basis. Consistent with this approach, neither the "Average Cost per Metric Tons CO₂e Reduced Across the Pilots" nor the "Weighted Average Cost per Metric Tons CO₂e Reduced Across the Pilots" calculations shown in Table 3 of Fresh Energy's Comments is relevant for determining whether the cost-effectiveness objective is successfully achieved.

VII. INCORPORATION OF LEARNINGS FROM EXISTING HYDROGEN PILOT

In its initial comments, CUB suggested that the Company could have utilized its experience with the existing hydrogen blending project to "better understand the feasibility of operating a packaged unit in Minnesota's cold climate."²³

As explained in the sections above, Standby's understanding of the unique technical requirements for operation in Minnesota's climate conditions was informed by its experience with the Company's existing Minneapolis hydrogen blending project. At the time the Company's initial Plan was filed, packaged systems were not designed to withstand colder climates but based on discussions with manufacturers it was understood that suitable packaged solutions were expected to become available by the time the pilot began development. However, as packaged systems entered the market, manufacturer-supported options for weatherization did not materialize, and third-party weatherization upgrades would impact commercial guarantees provided by manufacturers.

²⁰ *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) ("The Commission is persuaded that a holistic evaluation methodology is preferable to a majority test for determining whether CenterPoint has successfully achieved its cost-effectiveness objectives. A holistic approach gives the parties and the Commission more flexibility in subsequent evaluations and helps ensure that CenterPoint does not inappropriately prioritize some pilots over others.").

²¹ Minn. Stat. § 216B.2427, subd. 2(e).

²² Minn. Stat. § 216B.2427, subd. 3. c.

²³ CUB Initial Comments, p.4.

Given this context, the Company does not believe that additional experience with the custom Minneapolis hydrogen blending project would provide the Company with a deeper understanding of the feasibility of operating a packaged unit in Minnesota.

VIII. EXPLANATION OF HOW THE 25 PERCENT RANGE OF ACCURACY WAS SELECTED

In its Initial Comments, the Department requested an explanation of how the Pilot D FEED study selected 25 percent as the amount by which to increase total capital costs.²⁴

Standby noted that a range of accuracy between 15 percent and 25 percent was typically used for preliminary engineering estimates of this level. Based on the timeline and developing state of the green hydrogen industry, the upper end of the range was conservatively selected by Standby for the range of accuracy of the capital cost estimate in the FEED study. Application of the proposed contingency for this pilot is also consistent with the contingency that was proposed and approved by the Commission for Xcel's NGIA hydrogen electrolyzer pilot. As noted above, the approved contingency budget for Xcel's electrolyzer pilot was approximately 26.3 percent. Should the Commission approve the Company's budget modification request, the Company's initial budget increase and contingency budget increase requests initial request would equate to 23.2 percent of Pilot D's total five-year plan budget. Taken in isolation the Company's \$935,972 contingency budget request would equate to approximately 15.4 percent of Pilot D's updated total five-year plan budget.

IX. JUSTIFICATION FOR CAPITAL COST INCREASE'S IMPACT ON ANTICIPATED ITC BENEFIT

In its initial comments, the Department noted that the Company's revenue requirement calculation for capital costs associated with the Company's full budget modification proposal (initial budget request + contingency), did not assume that an increase in capital costs would impact the amount of ITC received. The Department requested that CenterPoint Energy explain its justification for this assumption in reply.²⁵

The amount of ITC received is dependent on the qualified investment towards solar components of the project, not the overall cost of the project. Due to the more established nature of the solar industry compared to green hydrogen, a higher level of uncertainty is assumed for the cost of the hydrogen facility compared to the solar facility. For budgeting purposes, CenterPoint therefore conservatively assumed that the 25 percent capital cost increase for the upper end of the range of accuracy for the FEED study estimate was attributed to hydrogen-related components, and therefore not eligible for additional ITCs.

X. RESPONSE TO DATA REQUESTS AND ADDITIONAL ANALYSIS

In its initial Comments, CUB requested that the Company provide a list of all costs incurred for Pilot D thus far.²⁶ The Company provides the requested information below:

²⁴ Department of Commerce Initial Comments, p.5.

²⁵ Department of Commerce Initial Comments, p.6.

²⁶ CUB Initial Comments, p.5.

Non-Capital Incremental Costs to date (2/28/2026)²⁷

Project Delivery	\$12,017
Advertising & Promotion	-
Allocation of General Portfolio Costs	\$179,562
Revenue Requirement for Capital Investment	-
Customer Incentives	-
Total	\$191,579
UTC Savings	-
Total Incremental Costs Counting Against Budget	\$191,579

Total Capital Costs to date (2/28/2026)²⁸ [TRADE SECRET]

Solar	-
Hydrogen	-
Permitting, Design, and Installation	[TRADE SECRET]
FEED Study	[TRADE SECRET]

Additionally, both CUB²⁹ and Fresh Energy³⁰ requested additional data and analysis from the Company, including updated cost-effectiveness and estimated lifetime utility costs based on the increased budget request, as well as an evaluation of the FEED study's full plus-or-minus 25 percent uncertainty range and sensitivities to account for federal policy uncertainty related to the anticipated federal tax credits achieved by Pilot D.

For this analysis, the Company used three circumstances to evaluate federal policy uncertainty related to available federal tax credits. The Normal Tax Credits circumstance maintains the tax credit assumptions the Company used in its January 2026 filing. The No Tax Credits circumstance assumes the Company does not receive the ITC for solar investment and PTC for hydrogen production. The High Tax Credits circumstance assumes that Company receives the ITC for solar investment and that hourly-matched renewable energy credits that satisfy PTC requirements post-2030 can be procured by the Company throughout the full 10-year PTC eligibility period.

²⁷ Project delivery and allocation of general portfolio costs will be recovered through the IAC or IAA.

²⁸ Note that capital costs for solar, hydrogen, and permitting/design/installation components are not mutually exclusive. The cost subsets noted in the table include estimated allocations for shared costs between components.

²⁹ CUB Initial Comments, p.5.

³⁰ Fresh Energy Initial Comments, p.6.

Table 1: Pilot D Budget Sensitivity Analysis³¹

	Total Incremental Costs Counting Against 5-Year Budget	Lifetime Total Revenue Requirement for Capital Costs	Lifetime Utility Cost	Estimated Lifecycle GHG Reductions (Metric Tons CO2e)	Cost per Metric Tons CO2e Reduced (\$/Metric Ton CO2e)
Scenario 1 - FEED Study Capital Cost Estimate, Normal Tax Credits	\$ 5,115,355	\$ 12,927,887	\$ 27,260,306	27,993	974
Scenario 2 - FEED Study Capital Cost Estimate + 25%, Normal Tax Credits	\$ 6,051,327	\$ 16,542,702	\$ 30,449,814	27,993	1088
Scenario 3 - FEED Study Capital Cost Estimate - 25%, Normal Tax Credits	\$ 4,366,578	\$ 10,036,035	\$ 24,708,700	27,993	883
Scenario 4 - FEED Study Capital Cost Estimate, No Tax Credits	\$ 6,822,975	\$ 14,459,260	\$ 30,373,591	27,993	1085
Scenario 5 - FEED Study Capital Cost Estimate + 25%, No Tax Credits	\$ 7,758,947	\$ 18,074,075	\$ 33,563,098	27,993	1199
Scenario 6 - FEED Study Capital Cost Estimate - 25%, No Tax Credits	\$ 6,074,198	\$ 11,567,408	\$ 27,821,985	27,993	994
Scenario 7 - FEED Study Capital Cost Estimate, High Tax Credits	\$ 5,115,355	\$ 12,927,887	\$ 24,857,333	27,993	888
Scenario 8 - FEED Study Capital Cost Estimate + 25%, High Tax Credits	\$ 6,051,327	\$ 16,542,702	\$ 28,046,841	27,993	1002
Scenario 9 - FEED Study Capital Cost Estimate - 25%, High Tax Credits	\$ 4,366,578	\$ 10,036,035	\$ 22,305,727	27,993	797
March 2024 Initial Plan Value	\$ 4,646,943	\$ 8,172,579	\$ 23,053,705	27,993	824

XI. CONCLUSION

CenterPoint Energy thanks the Commission for its consideration of these comments.

³¹ See Attachment 1

CERTIFICATE OF SERVICE

I, Christina Benning, certify that on Tuesday, March 17, 2026, I served the attached Reply Comments of CenterPoint Energy in Docket No. G-008/M-23-215 to all persons at the addresses indicated on the attached service list by having the document delivered via electronic filing.

/s/ Christina Benning

Senior Regulatory Paralegal
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129	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	23-215Official
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131	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	23-215Official
132	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	23-215Official
133	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	23-215Official
134	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
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136	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
137	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	23-215Official
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142	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	23-215Official
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