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December 15, 2025

Sydney Lieb, Ph.D.
Assistant Commissioner of Regulatory Analysis
Minnesota Department of Commerce
Division of Energy Resources
85 7th Place East, Suite 500
St. Paul, MN 55101-2198

VIA ELECTRONIC FILING

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

Reply Comments of Minnesota Energy Resources Corporation

Dear Dr. Lieb:

On October 29, 2025, the Minnesota Department of Commerce, Division of Energy Resources ("Department"), issued a notice of filing of a Proposed Decision on the Technical Reference Manual Version 5.0 ("TRM"), in the above-referenced docket. On November 20, 2025, CenterPoint Energy, Connexus Energy, Dakota Electric Association, Great River Energy, Minnesota Energy Resources Corporation ("MERC" or the "Company"), Minnesota Municipal Utilities Association, Minnesota Power Company, Xcel Energy, and Otter Tail Power Company (collectively, "the Utilities") provided joint comments expressing concerns about the Technical Reference Manual Advisory Committee ("TRMAC") process and the approach taken to propose changes to the residential furnace baseline in the *Draft TRM v.5.0*. MERC, as well as CenterPoint Energy, Otter Tail Power Company, and Xcel Energy, also submitted individual comments on the Proposed Decision. Additionally, Center for Energy and Environment ("CEE") and Fresh Energy submitted comments on the proposed increase to the baseline efficiency for single-family residential furnaces from 80 to 90% Annual Fuel Utilization Efficiency ("AFUE"). MERC respectfully submits these Reply Comments in response to the Utilities' and CEE's initial comments.

MERC reiterates the concerns raised in our November 20 Comments and in the Joint Utility Comments regarding the proposed furnace baseline increase, which bypassed the TRMAC stakeholder feedback and technical review process. As detailed in those initial comments, MERC is concerned about the precedent this establishes for future Energy Conservation and Optimization ("ECO") regulatory proceedings. Additionally, MERC is concerned about the potential unintended consequences of the proposal to low-income customers, who most benefit from the availability of rebates for high-efficiency natural gas equipment.

In reference to CEE's citation of Home Energy Squad ("HES") visits to inform the 90% AFUE baseline change, MERC is concerned with the applicability of this data to MERC's customer base, which was obtained by CenterPoint Energy and Xcel Energy HES visits primarily in more urban areas. As CEE noted in their comments, the HES data disproportionately represents Hennepin and Ramsey Counties.¹ This geographic distribution is not representative of MERC's service areas and may overstate furnace baseline efficiencies in MERC's territory and rural areas. Additionally, as CEE note in their Comments, the homes represented in the HES data chose to undergo an HES visit, which could imply that the households are more energy-conscious and willing to install a high efficiency furnace.²

Should the 90% AFUE single-family residential furnace baseline be approved, MERC will explore alternative approaches that more accurately reflect furnace baselines for participants in MERC's ECO programs. These alternatives may include CEE's recommendation #2 to apply the federal minimum 80% AFUE standard as the measure baseline in cases where MERC can verify the actual efficiency of the existing furnace, and the existing furnace AFUE is lower than 90%.³ This approach would allow MERC to continue prioritizing and offering higher customer rebates for the replacement of lower efficiency, non-condensing furnaces. It also would accurately reflect the baseline for these customers since a customer replacing a non-condensing furnace would likely not choose a condensing furnace without a market intervention.

Additionally, if the 90% AFUE baseline is adopted in the TRM, the Department could also consider CEE's recommendation #3 to implement a low-income-specific furnace baseline, as evidence suggests that low-income households are more likely to have a furnace with an efficiency rating lower than 90% AFUE.⁴

MERC reaffirms our initial comments regarding the process, technical issues, and customer impacts of the Proposed Decision and supports the comments filed by CenterPoint Energy, Otter Tail Power Company, and Xcel Energy related to the increase to the residential single-family furnace baseline. MERC recommends that the furnace baseline remain at 80% in TRM 5.0 and that the proposed residential furnace baseline update be further evaluated through the TRMAC process before being considered for inclusion in the Minnesota TRM.

¹ *In the Matter of Minnesota Technical Reference Manual Version 5.0*, Docket E,G999/CIP-18-694, Center for Energy and Environment Comments at 9 (Nov. 20, 2025).

² *Id.*

³ *Id.* at 19.

⁴ *Id.*

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Please contact me at (651) 322-8917 or jennifer.kimmen@wecenergygroup.com if you have any questions regarding these Comments.

Sincerely,

A handwritten signature in black ink, reading "Jennifer A. Kimmen". The signature is fluid and cursive, with the first name "Jennifer" being the most prominent part.

Jennifer Kimmen
Senior Customer Program
Manager
WEC Business Services, Inc.

cc: Service Lists

CERTIFICATE OF SERVICE

I, Kristin M. Stastny, hereby certify that on the 15th day of December, 2025, on behalf of Minnesota Energy Resources Corporation (MERC), I electronically filed a true and correct copy of the enclosed Reply Comments on www.edockets.state.mn.us. Said documents were also served via U.S. mail and electronic service as designated on the attached service lists.

Dated this 15th day of December, 2025.

/s/ Kristin M. Stastny

Kristin M. Stastny

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2	Julie	Ambach	juliea@cmmmpa.org	Shakopee Public Utilities		255 Sarazin St Shakopee MN, 55379 United States	Electronic Service		No	18-694CIP-18-694
3	Kathy	Baerlocher	kathy.baerlocher@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	18-694CIP-18-694
4	Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company		PO Box 351 200 1st St SE Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	18-694CIP-18-694
5	Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	18-694CIP-18-694
6	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	18-694CIP-18-694
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10	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	18-694CIP-18-694
11	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	18-694CIP-18-694
12	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	18-694CIP-18-694
13	Ray	Choquette	rchoquette@agp.com	Ag Processing		12700 West Dodge Road	Electronic Service		No	18-694CIP-

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15	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	18-694CIP-18-694
16	Bradley	Davison	bradley.davison@mdu.com	Great Plains Natural Gas Company			Electronic Service		No	18-694CIP-18-694
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18	Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.		823 E 7th St St. Paul MN, 55106 United States	Electronic Service		No	18-694CIP-18-694
19	Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.		2377 Union Lake Trl Northfield MN, 55057 United States	Electronic Service		No	18-694CIP-18-694
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22	Lisa	Fischer	lisa.fischer@mrenergy.com	Missouri River Energy Services		PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	18-694CIP-18-694
23	Karolanne	Foley	karolanne.foley@dairylandpower.com	Dairyland Power Cooperative		PO Box 817 La Crosse WI, 54602-0817 United States	Electronic Service		No	18-694CIP-18-694
24	Tyler	Glewwe	tyler.glewwe@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	18-694CIP-18-694
25	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	18-694CIP-18-694
26	Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	18-694CIP-18-694

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29	Kurt	Hauser	kurt.hauser@mrenergy.com	Missouri River Eenergy Services		3724 W Avera Dr PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	18-694CIP-18-694
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31	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	18-694CIP-18-694
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49	Leah	Peterson	lpeterson@mnpower.com	Minnesota Power		30 West Superior St Duluth MN, 55802 United States	Electronic Service		No	18-694CIP-18-694
50	Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	18-694CIP-18-694
51	Joe	Plummer	jplummer@franklinenergy.com	Franklin Energy Services, LLC		2303 Wycliff St Suite 2E St. Paul MN, 55114 United States	Electronic Service		No	18-694CIP-18-694
52	Bill	Poppert	info@technologycos.com	Technology North		2433 Highwood Ave St. Paul MN, 55119 United States	Electronic Service		No	18-694CIP-18-694
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57	Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		No	18-694CIP-18-694
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64	Analeisha	Vang	avang@mnpower.com			30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	18-694CIP-18-694
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69	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	18-694CIP-18-694
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71	Brian	Zavesky	brianz@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive P.O. Box 88920 Sioux Falls SD, 57108-8920 United States	Electronic Service		No	18-694CIP-18-694
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12	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
13	Bradley	Davison	bradley.davison@mdu.com	Great Plains Natural Gas Company			Electronic Service		No	ECO SPECIAL SERVICE LIST
14	Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.		7701 France Ave S Ste 600 Edina MN, 55435 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
15	Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.		823 E 7th St St. Paul MN, 55106 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
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20	Tyler	Glewwe	tyler.glewwe@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
21	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
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25	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
26	Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency		702 3rd Ave S Virginia MN, 55792 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
27	Martin	Kapsch	martin.kapsch@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
28	Zach	Klabo	zach.klabo@mdu.com	Great Plains Natural Gas Company			Electronic Service		No	ECO SPECIAL SERVICE LIST
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30	Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas		null null, null United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
31	Tina	Koecher	tkoecher@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
32	Martin	Lepak	martin.lepak@aeoa.org	Arrowhead Economic Opportunity		702 S 3rd Ave Virginia MN, 55792 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
33	Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission		1902 6th Ave E Hibbing MN, 55746 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
34	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
35	Josh	Mason	jmason@rpu.org	Rochester Public Utilities		4000 E River Rd NE Rochester MN, 55906	Electronic Service		No	ECO SPECIAL SERVICE LIST

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39	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
40	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
41	Larry	Oswald	larry.oswald@mdu.com	Great Plains Natural Gas Company		105 W Lincoln Ave PO Box 176 Fergus Falls MN, 56538-9001 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
42	Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
43	Bill	Poppert	info@technologycos.com	Technology North		2433 Highwood Ave St. Paul MN, 55119 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
44	Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024-9583 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
45	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	ECO SPECIAL SERVICE LIST
46	Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501	Electronic Service		No	ECO SPECIAL SERVICE LIST

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