

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

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|--------------------|--------------|
| Katie Sieben       | Chair        |
| Joseph K. Sullivan | Vice Chair   |
| Hwikwon Ham        | Commissioner |
| Audrey Partridge   | Commissioner |
| John Tuma          | 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

**INITIAL COMMENTS OF THE OFFICE  
OF THE ATTORNEY GENERAL—  
RESIDENTIAL UTILITIES DIVISION**

**INTRODUCTION**

The Office of the Attorney General—Residential Utilities Division (OAG) respectfully submits the following Comments in response to the Public Utilities Commission’s Notice of Comment Period issued on June 13, 2025. The OAG is charged by statute with representing the interest of residential and small business customers in matters before the Commission.<sup>1</sup>

CenterPoint’s annual report covers just under three months of its Natural Gas Innovation Act (NGIA) plan. While the plan is in the early stages, the OAG wishes to ensure that CenterPoint is appropriately focusing on providing benefits to small business customers with two of its pilots. In addition, major shifts in federal policy have occurred in 2025. While these changes occurred outside of the plan year, CenterPoint must account for them as it seeks to successfully implement the pilots and protect ratepayers from unreasonable costs.

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<sup>1</sup> Minn. Stat. § 8.33.

## BACKGROUND

CenterPoint's NGIA was approved as modified by the Commission on October 9, 2024.<sup>2</sup> CenterPoint's plan includes 17 pilots. These pilots range from acquiring Renewable Natural Gas to constructing a second hydrogen electrolyzer to working to incentivize adoption of electric heat pumps with gas backup. Twelve of the seventeen pilots involve participation by CenterPoint's customers, and small business customers are only eligible to participate in three of these pilots.<sup>3</sup> Only one pilot, Pilot O, is targeted at serving small and medium businesses.

The NGIA requires that a utility with an approved plan file annual reports with the Commission. The statute lays out several requirements for these filings, including costs incurred, the economic impact of the plan, and the utility's progress towards achieving cost-effectiveness objectives set by the Commission.<sup>4</sup> The utility must also report on "modifications to elements of the plan proposed by the utility."<sup>5</sup>

When evaluating annual reports, the Commission may: "(1) approve the continuation of a pilot program included in the plan, with or without modifications; (2) require the utility to file a new or modified pilot program or plan; or (3) disapprove the continuation of a pilot program or plan."<sup>6</sup>

CenterPoint's annual report for 2024 includes just a few months of its approved plan. Nevertheless, it provides insights into the approach CenterPoint is taking with several of the pilots.

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<sup>2</sup> [Order Approving Natural Gas Innovation Plan with Modifications](#) (Oct. 9, 2024) (CenterPoint NGIA Order).

<sup>3</sup> See [OAG Supp. Comments](#) at 21 (table 1a) (May 15, 2024). Pilot M is open to all non-residential customers, Pilot O is open to all commercial and industrial customers, and Pilot Q is open to all commercial and industrial customers. See *id.*; [CenterPoint NGIA Initial Filing](#), Ex. D at 39, 48, and 52.

<sup>4</sup> See Minn. Stat. § 216B.2427, subd. 2(f).

<sup>5</sup> Minn. Stat. § 216B.2427, subd. 2(f)(7).

<sup>6</sup> Minn. Stat. § 216B.2427, subd. 2(g).

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Moreover, significant exogenous changes have occurred since CenterPoint's NGIA plan was approved that may impact the effectiveness or costs of CenterPoint's pilots. The Commission should therefore engage in a careful review of this partial-year report.

### ANALYSIS

While CenterPoint's plan is still in the early stages, its partial year report for 2024 is informative and the Commission should assess whether any changes have occurred that could require pilot modifications. A major change since CenterPoint's NGIA was approved is the enactment by the federal government of H.R.1, the One Big Beautiful Bill Act, (HR1), which restructures the U.S. Tax Code, including by sunsetting tax credits for certain renewable energy projects sooner than anticipated.

The OAG is concerned with Pilot D's timeline for construction and in-service and the resulting potential for lost tax credits from HR1's tax changes. These changes increase the risk that Pilot D will exceed its budget.

The OAG also requests that CenterPoint ensure Pilot M is implemented to include benefits to small businesses, particularly those in environmental justice areas. Last, CenterPoint should explore ways that it can increase participation in Pilot O by "small businesses" as envisioned by the Legislature when it mandated this type of pilot as part of CenterPoint's initial NGIA plan.

#### **I. PILOT D – GREEN HYDROGEN BLENDING INTO NATURAL GAS DISTRIBUTION SYSTEM**

Pilot D of CenterPoint's NGIA plan authorizes CenterPoint to own and operate a one-megawatt hydrogen plant at an existing CenterPoint facility in Mankato.<sup>7</sup> As part of the pilot CenterPoint would install solar panels at the facility dedicated to powering the electrolyzer,

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<sup>7</sup> [CenterPoint NGIA Order](#) at 8.

hydrogen storage system, and other necessary systems and equipment to generate, store, and blend hydrogen into CenterPoint's natural gas system.<sup>8</sup>

CenterPoint already operates an existing hydrogen blending system in Minneapolis. That facility, however, does not have onsite renewable generation such as solar panels. While several commenters questioned the pilot's desirability due to CenterPoint's similar Minneapolis operation, the Commission approved the pilot finding that it "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."<sup>9</sup>

**A. Tax Credit Uncertainty Following Enactment of HR1**

As part of CenterPoint's NGIA plan, the Commission approved the version of Pilot D that CenterPoint included in Reply Comments with minor modifications that CenterPoint specify the source of power in addition to its solar array that it will use.<sup>10</sup> In reply comments, CenterPoint had estimated that the lifetime utility cost of Pilot D were \$23,053,705 with \$4,646,943 of that cost counting against its five-year NGIA budget.<sup>11</sup> These amounts for Pilot D assume that CenterPoint will receive over \$2 million in tax credits tied to the Inflation Reduction Act (IRA). Indeed, CenterPoint argued that one of the "learning opportunities of Pilot D," versus its existing Minneapolis hydrogen blending facilities, was the evaluation of federal incentives at this location.<sup>12</sup> The contemplated federal incentives included production tax credits (PTCs) for both the on-site solar array and purchased renewable power and investment tax credits (ITCs) for the solar array:

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<sup>8</sup> *Id.*.

<sup>9</sup> *Id.* at 9.

<sup>10</sup> *Id.*

<sup>11</sup> [CenterPoint Reply Comments, Ex. A](#) at 2 (Mar. 15, 2024).

<sup>12</sup> [CenterPoint Reply Comments](#) at 56.

| <b>Estimated Tax Credit Value from CenterPoint Reply Comments – March 15, 2024<sup>13</sup></b> |                    |
|-------------------------------------------------------------------------------------------------|--------------------|
| ITC for Solar Array                                                                             | \$660,000          |
| PTC based on on-site solar production                                                           | \$895,008          |
| PTC based on renewable grid electricity portion                                                 | \$565,268          |
| <b>Total</b>                                                                                    | <b>\$2,120,275</b> |

HR1 made several changes to the IRA that change or remove the tax benefits that are incorporated into Pilot D’s estimated costs depending on several factors. The most straightforward change HR1 made to the IRA relevant to Pilot D is significantly moving up the dates for when projects would need to begin construction or be placed in-service to qualify for tax credits. In this regard, there are at least two major changes and a third potential change:

First, HR1 amended Section 48E(e) of the Internal Revenue Code eliminated ITCs for wind and solar facilities if they are “placed in service by the taxpayer after December 31, 2027.”<sup>14</sup> Second, HR1 amended Section 45V(c)(3)(C) of the Internal Revenue Code’s definition of a “qualified clean hydrogen production facility” to require construction begin before January 1, 2028, rather than January 1, 2033.<sup>15</sup> Third, there may be changes to the guidance CenterPoint relied on to include \$565,268 in PTCs for renewable grid energy production. In reply comments, CenterPoint revised its original estimates of tax benefits in its initial NGIA plan based on guidance for the Department of Treasury, Internal Revenue Service (IRS), suggesting that PTCs could be

<sup>13</sup> See Attach. 1 (CenterPoint Response to OAG IR no. 004); [CenterPoint Reply Comments](#), Ex. F (Mar. 15, 2023) (values found in Conservative Adjusted PTC Plan).

<sup>14</sup> H.R.1, sec. 70513 Termination and Restrictions on Clean Electricity Investment Credit, available at <https://www.congress.gov/bill/119th-congress/house-bill/1/text>.

<sup>15</sup> H.R.1, sec. 70511 Termination of Clean Hydrogen Production Credit.

earned with grid electricity purchases covered by RECs or green tariff programs.<sup>16</sup> Just a few days after HR1 was enacted, President Trump issued an executive order directing Treasury to take actions to “strictly enforce” the termination of the PTCs and ITCs in HR1 within 45 days.<sup>17</sup> This includes issuing new or revised guidance “to ensure that policies concerning the ‘beginning of construction’ are not circumvented, including by preventing the artificial acceleration or manipulation of eligibility and by restricting the use of broad safe harbors unless a substantial portion of a subject facility has been built.”<sup>18</sup> Additional guidance on these points could eliminate CenterPoint’s ability to receive its estimated \$565,268 for PTCs for solar or wind grid purchases depending on Treasury’s actions.<sup>19</sup>

The OAG requested that CenterPoint provide estimates of the timing of construction and in-service dates for both Pilot D’s solar facilities and electrolyzer to evaluate any impacts to the estimated tax benefits from HR1. CenterPoint responded that “[b]eginning of construction will depend on design and sourcing considerations, but is expected in 2026.”<sup>20</sup> For the in-service date,

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<sup>16</sup> See [CenterPoint Reply Comments](#) at 57 (citing 88 Fed. Reg. 89220, Notice of Proposed Rulemaking and Notice of Public Hearing, Section 45V Credit for Production of Clean Hydrogen; Section 48(a)(15) Election to Treat Clean Hydrogen Production Facilities as Energy Property (Dec. 26, 2023), *available at* <https://www.federalregister.gov/documents/2023/12/26/2023-28359/section-45v-credit-for-production-of-clean-hydrogen-section-48a15-election-to-treat-clean-hydrogen>).

<sup>17</sup> Exec. Order No. 14315, Ending Market Distorting Subsidies for Unreliable, Foreign-Controlled Energy Sources (July 10, 2025), *available at* <https://www.federalregister.gov/documents/2025/07/10/2025-12961/ending-market-distorting-subsidies-for-unreliable-foreign-controlled-energy-sources>.

<sup>18</sup> *Id.*

<sup>19</sup> The original guidance that CenterPoint relied on to include the PTCs for these purchases determined that Energy Attribute Certificates could be used to qualify hydrogen facilities for PTCs. See 88 Fed. Reg. 89220 at 89227-28. It is not clear whether this determination will be revisited or whether additional conditions will be placed on eligible Energy Attribute Certificates that will make obtaining them more onerous or costly.

<sup>20</sup> Attach. 1 at parts J-K (CenterPoint Response to OAG IR No. 004).

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CenterPoint estimated placing both the solar array and electrolyzer into service in 2027.<sup>21</sup> CenterPoint did not provide a more specific month or quarter of 2026 and 2027.

The tax implications and impact of HR1 on Pilot D are complex. Whether Pilot D will qualify for PTCs, ITCs, or neither appears heavily dependent on the timing of the specific project and may be further implicated by executive actions or revised IRS guidance. The OAG is appreciative that CenterPoint current estimates for the beginning of construction and in-service dates for the solar array and electrolyzer would appear to qualify them for ITCs and PTCs, respectively. But construction and in-service estimates can be extended, and the OAG is particularly concerned that the in-service date for the solar array of sometime in 2027 is cutting it very close to the deadline for that project to qualify for ITCs. If the solar array fails to qualify for ITCs, it will result in an estimated \$660,000 increase to the pilot cost that CenterPoint will seek to recover from ratepayers.

The OAG requests that in reply comments, CenterPoint provide its assessment of the potential impacts of HR1 on the estimated tax benefits in Pilot D and describe what steps it will take to mitigate these potential impacts and receive the full tax benefits estimated when the Commission approved Pilot D. The OAG also requests that CenterPoint provide more specific information on how it determined its beginning of construction and in-service estimates, and how it plans to ensure these dates are not delayed. Last, to ensure the Commission remains apprised of the beginning of construction and in-service status of the project, the OAG requests that CenterPoint file a notification in this docket if its estimated beginning-of-construction or in-service dates for either the solar array or the electrolyzer are delayed in any way.

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<sup>21</sup> *Id.* at parts E-F.

**B. City of Mankato Outreach**

In its annual report, CenterPoint stated that it “committed to engaging with the City of Mankato to identify and address community questions with the hydrogen blending project. The Company will initiate discussions with Mankato city officials in 2025 regarding the addition of hydrogen equipment to an existing CenterPoint Energy site.”<sup>22</sup> In response to OAG IR 005, however, CenterPoint confirmed that it has not yet begun discussions with the City of Mankato to address community questions about the hydrogen blending project.<sup>23</sup>

While CenterPoint states that it “expects to meet with city representatives by August of [2025],” the slow pace of community engagement is concerning for two reasons. First, the fact that CenterPoint has not yet initially met with city representatives may not allow for further discussions of potential concerns before the project begins construction or is placed into service. Second, if the community has concerns that must be addressed, this may delay the beginning-of-construction and in-service dates which could reduce the tax benefits of Pilot D and increase ratepayer costs.

The OAG requests that CenterPoint address in reply comments how it will conduct meaningful community engagement on the timeline that will be required to earn the contemplated federal tax credits before they expire.

**II. PILOT M - COMMERCIAL HYBRID HEATING**

Pilot M seeks to support small to medium commercial buildings that want to replace their Heating, Ventilation, and Air Conditioning (HVAC) system with a hybrid system that uses electric heat pumps and gas as a backup.<sup>24</sup> CenterPoint indicated that they are looking for 15 customers to install the HVAC systems in year one and then double that number in Year 2 with 30, followed by

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<sup>22</sup> [CenterPoint NGIA Annual Report for 2024 Calendar Year](#) at 20.

<sup>23</sup> Attach. 2 (CenterPoint Response to OAG IR No. 005).

<sup>24</sup> [CenterPoint NGIA Annual Report](#) at 30.

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30 in years three, four, and five respectively.<sup>25</sup> In approving Pilot M as part of CenterPoint’s NGIA, the Commission agreed with the City of Minneapolis “on the importance of having small businesses in environmental justice areas participate in Pilot M.”<sup>26</sup> The Commission, therefore, required CenterPoint “to monitor the type of customers that enroll in Pilot M, report its findings, and discuss whether pilot modifications are warranted in a disproportionately low number of participants are located in environmental justice areas.”<sup>27</sup>

In 2024, no customer installed heating systems through Pilot M. CenterPoint acknowledged that it did not start work on this pilot-project in 2024. In early 2025, CenterPoint issued a request for proposal (RFP) to contract qualified vendors for both the implementation and the measurement and verification components of the pilot.<sup>28</sup> The RFP is described as focusing on finding a vendor to provide support to commercial buildings focused on “dual-fuel” rooftop units and may include split system hybrid heat pumps.<sup>29</sup> The OAG is concerned about Pilot M’s ability to attract small businesses or small businesses in areas of environmental justice.

Since the pilot had not started in 2024, and based upon the timeline outlined in the report, the OAG requested a copy of the RFP to be used to complete Pilot M.<sup>30</sup> The OAG wishes to ensure that Pilot M is being developed to encourage participation by small businesses, particularly in environmental justice areas. The RFP combines two components for Pilot M so that Part 2 is about Implementation services and Part 3 is about Measurement and Verification Services.<sup>31</sup> Bidders

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<sup>25</sup> Attach. 3, RFP at 6 (CenterPoint Energy Response to OAG IR No. 009 and RFP).

<sup>26</sup> CenterPoint NGIA Order at 19.

<sup>27</sup> *Id.*

<sup>28</sup> CenterPoint Annual Report at 30.

<sup>29</sup> Attach. 3 at 2, RFP at 4-5 (CenterPoint Energy Response to OAG IR No. 009 and RFP).

<sup>30</sup> Attach. 3 at 1, RFP at 2, 7 (CenterPoint Energy Response to OAG IR No. 009 and RFP). Part 1 is about Pilot F.

<sup>31</sup> Attach. 3, RFP at 3 (CenterPoint Energy Response to OAG IR No. 009 and RFP).

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“may respond to any combination of the requested services,” and “do not need to respond to all components of the RFP.”<sup>32</sup> The “requested services” in the RFP are wide ranging including, “targeted customer outreach, technical support for project sizing and design, custom savings calculations, and direct installation of hybrid heating systems using a network of participating trade allies.”<sup>33</sup> It is not until page 9 of the RFP, that CenterPoint requests vendors focus the target customer outreach to a “wide array of commercial segments.” Only in the same bullet does CenterPoint ask RFP vendors about trying to market to a variety of business types (“small, medium, and large”) and areas of “economic injustice.”<sup>34</sup> Additionally, while there is an appropriate ask for references to be requested, and the OAG is concerned about attracting program participants, it is unclear if any smaller vendors may have access or a relationship with a Fortune 500 company.<sup>35</sup>

The OAG is concerned about CenterPoint or its vendors’ ability to attract small businesses and small businesses in environmental justice areas to participate in the pilot.<sup>36</sup> The small and medium sized businesses are facing a period of immense industry uncertainty and potential supply disruptions.<sup>37</sup> These disruptions may hinder the small business and their financial status, their ability to participate in the program, and the actual installation of the HVAC systems. Small

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<sup>32</sup> *Id.*

<sup>33</sup> *Id.*, RFP at 5.

<sup>34</sup> *Id.*, RFP at 9.

<sup>35</sup> *Id.*, RFP at 14.

<sup>36</sup> [CenterPoint NGIA Order](#) at 19.

<sup>37</sup> For example, the Federal Reserve Bank of Cleveland recently reported on a survey of nonprofits that support small businesses that demand for the nonprofits services increased as “small business owners sought assistance managing higher expenses, modifying supply chains, and obtaining credit.” Survey respondents also noted “small businesses had lost federal contracts and that federal policy changes were raising concerns about future contract opportunities, especially for women-, minority-, and veteran-owned businesses.” *See* The Beige Book: Summary of Commentary on Current Economic Conditions by Federal Reserve District at 19 (July 2025), *available at* [https://www.federalreserve.gov/monetarypolicy/files/BeigeBook\\_20250716.pdf](https://www.federalreserve.gov/monetarypolicy/files/BeigeBook_20250716.pdf).

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businesses typically have smaller budgets, which offer less shock absorption to market changes. Small businesses may be more risk adverse and may be less likely to make upgrades to their HVAC systems even with the Pilot's assistance of 60 percent of the system cost, up to \$100,000.<sup>38</sup> While the stress of disruption may further incentivize customers to participate in a savings program, the impact is difficult to anticipate.

CenterPoint should ensure its vendors are experienced working with small businesses in environmental justice areas. It is not until page 9 of the RFP, that CenterPoint requests vendors focus the target customer outreach to a "wide array of commercial segments." Only in the same bullet does CenterPoint ask RFP vendors about trying to market to a variety of business types ("small, medium, and large") and areas of "economic situation (environmental justice areas, etc.)."<sup>39</sup> CenterPoint also requests references including one from a utility and one from a Fortune 500 company.<sup>40</sup> But it is unclear if vendors who have experience working with small businesses in environmental justice communities will have access to or a relationship with a Fortune 500 company.<sup>41</sup>

The OAG recognizes the importance of flexibility in an RFP and in piloting a program, however it seems appropriate to flag these shortcomings in this initial NGIA report so that processes can be improved going forward. The OAG is concerned that the lack of focus in the RFP on seeking vendors that will serve a variety of business types and indicates a lack of focus on providing the benefits of this pilot to small businesses, particularly those in environmental justice areas. The OAG requests that in reply comments CenterPoint explain how it plans to ensure that

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<sup>38</sup> CenterPoint NGIA Initial Filing, Ex. D at 40 (describing incentives of Pilot M).

<sup>39</sup> Attach. 3, RFP at 9 (CenterPoint Energy Response to OAG IR No. 009 and RFP).

<sup>40</sup> Attach. 3, RFP at 14 (CenterPoint Energy Response to OAG IR No. 009).

<sup>41</sup> *Id.*

its selected vendors will have sufficient experience with small businesses in environmental justice areas so they will benefit from Pilot M.

### **III. Pilot O – Small/Medium Business GHG Audit**

Pilot O is an expansion of CenterPoint’s “existing Conservation Improvement Program (CIP) Natural Gas Energy Analysis project to include identification of non-CIP GHG reducing opportunities for small- and medium-sized businesses.”<sup>42</sup> As the Commission’s Order recognized, the NGIA requires that CenterPoint’s first innovation plan “must include a pilot program to provide thermal energy audits to small- and medium-sized businesses in order to identify opportunities to reduce or avoid greenhouse gas emissions from natural gas use.”<sup>43</sup> Notably, however, Pilot O was not limited to providing benefits to small- and medium-sized businesses. CenterPoint instead stated: “All commercial and industrial customers are eligible for participation in the pilot. However, the Company plans to target this offering towards small and medium business customers.”<sup>44</sup> Because the program is an extension of an existing ECO program, CenterPoint is further along with its roll-out than other pilots and has executed 84 audits under the pilot.<sup>45</sup>

While the NGIA does not specifically define “small- and medium-sized businesses” for the purpose of the requirement for this type of pilot, the Minnesota Statutes do define “small business.” Specifically, Minn. Stat. § 645.445, subdivision 1, provides, “Wherever the term ‘small business’ is used in Minnesota Statutes or in any rule or program established thereunder, the definitions contained in this section shall apply unless the context clearly indicates that a different meaning is

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<sup>42</sup> [CenterPoint NGIA Order](#) at 20.

<sup>43</sup> Minn. Stat. § 216B.2427, subd. 6.

<sup>44</sup> [CenterPoint Initial Filing](#), Ex. D at 50.

<sup>45</sup> Attach. 4 (CenterPoint Response to OAG IR No. 10 with attachment).

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intended or required.” The NGIA provides no such alternate meaning, and therefore the definition of “small business” in section 645.445 governs:

Small business means a business entity organized for profit . . . which entity:

- (1) is not an affiliate or subsidiary of a business dominant in its field of operation; and
- (2) has 20 or fewer full-time employees; or
- (3) in the preceding fiscal year has not had more than the equivalent of \$1,000,000 in annual gross revenues; or
- (4) if the business is a technical or professional service, shall not have had more than the equivalent of \$2,500,000 in annual gross revenues in the preceding fiscal year.<sup>46</sup>

In order to determine if Pilot O was reaching the legislatively required demographics, the OAG requested that CenterPoint provide a list of pilot participants. After reviewing CenterPoint’s pilot participant list from January-May 2025, the OAG determined that Pilot O is not sufficiently targeting “small businesses” as intended by the Legislature. Although CenterPoint reports that as of May 2025, 43 of the 84 pilot participants are “small” gas customers, CenterPoint’s definition of “small” allows for usage up to 5,000 therms per year.<sup>47</sup> But customer gas usage will not directly correlate to the size of a business or the definition of “small business.” For example, a gas customer may use a small amount of gas but be a location that is owned by a large multi-national corporation. Also, governmental and non-profit entities may be small gas customers, but would not meet the definition of “small business” because they are not “a business entity organized for profit.”<sup>48</sup>

The customers that CenterPoint counts as “small” show that small customers and “small businesses” do not necessarily line up. For example, CenterPoint’s pilot participants include [NOT

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<sup>46</sup> Minn. Stat. § 645.445, subd. 2.

<sup>47</sup> Attach. 4, Part E (CenterPoint Response to OAG IR No. 10).

<sup>48</sup> Minn. Stat. § 645.445, subd. 2.

[REDACTED] **NOT PUBLIC DATA ENDS]**.<sup>49</sup> The OAG believes that, conservatively, over half of the small gas customers that CenterPoint reports are not within the meaning of “small business” intended by the Legislature.

Because small gas customers and small businesses are not synonymous, CenterPoint must make an additional effort to work with its vendor to target small businesses so that the pilot can achieve the goals of the Legislature’s directive. The NGIA required CenterPoint to propose a pilot program that provides thermal energy audits to small- and medium-sized businesses. While Pilot O meets this requirement, in order to ensure that the Legislature’s intent is manifested in the pilot roll-out, the OAG requests that in reply CenterPoint discuss what more it can do target “small businesses” as defined by Minn. Stat. § 645.445 to receive the benefits of this pilot.

### CONCLUSION

The OAG appreciates the opportunity to comment on CenterPoint’s first annual report and requests that CenterPoint provide responses in reply to the concerns raised above.

Dated: July 28, 2025

Respectfully submitted,

KEITH ELLISON  
State of Minnesota  
Attorney General

/s/ Wendy Raymond  
WENDY RAYMOND  
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<sup>49</sup> See Attach. 4 (CenterPoint Response to OAG IR No. 10, attachment – NOT PUBLIC version).

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ATTORNEYS FOR MINNESOTA  
OFFICE OF THE ATTORNEY GENERAL—  
RESIDENTIAL UTILITIES DIVISION

**State of Minnesota**  
**Minnesota Office of the Attorney General**

**Utility Information Request**

Docket Number: Dkt. G-008/M-23-215 - NGIA  
Requested From: CenterPoint Energy Minnesota Gas

Date of Request: 6/25/2025  
Response Due: 7/8/2025

Analyst Requesting Information: utilityinfo@ag.state.mn.us

Type of Inquiry: Forecasting

***If you feel your responses are trade secret or privileged, please indicate this on your response.***

| Request No. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| OAG 004     | <p><b>Reference:</b> Annual Report for 2024 Calendar Year at 14 – Pilot D:<br/>As proposed in the Company’s initial NGIA filing, CenterPoint Energy has proposed Pilot D, Green Hydrogen Blending into Natural Gas Distribution System which could qualify for an Investment Tax Credit (“ITC”) of 6% to 50% of qualified costs under the IRA. The amount of ITC that could be claimed for Pilot D is dependent on whether the project satisfies labor requirements and domestic manufacturing requirements. Alternatively, Pilot D could potentially be able to take advantage of Production Tax Credits (“PTC”) in the range of \$0.60 to \$3.00/kg of hydrogen production. Ultimately the decision between an ITC and a PTC will require further analysis on the final design of the pilot.</p> <p><b>Request:</b></p> <p>A. State CenterPoint’s understanding of whether Pilot D would qualify for an ITC using the currently planned design.</p> <p>B. Describe CenterPoint’s understanding of the current guidance on what pilot- or project- design changes would be required for Pilot D to qualify for ITCs.</p> <p>C. State whether CenterPoint anticipates placing the electrolyzer component of the pilot into service by January 1, 2029.</p> <p>D. State whether CenterPoint anticipates placing the solar array component of the pilot into service by January 1, 2029.</p> <p>E. Provide the anticipated date by which CenterPoint anticipates placing the electrolyzer component of Pilot D into service. If only an estimate is available, provide the estimate.</p> <p>F. Provide the anticipated date by which CenterPoint anticipates placing the solar array component of Pilot D into service. If only an estimate is available, provide the estimate.</p> <p>G. Confirm that CenterPoint’s currently approved budget assumes that PTCs</p> |

Response By: Betsy Lang  
Title: Lead Analyst, Regulatory & Legislative  
Department: Regulatory Services  
Telephone: 612-321-4318

will be available for the project.

1. If the answer to Part G is anything other than an unqualified confirmation, explain each specific tax offset that was included in the Commission approved budget for Pilot D.

H. State whether CenterPoint anticipates beginning construction on the electrolyzer component of Pilot D before January 1, 2026.

I. State whether CenterPoint anticipates beginning construction on the solar array component of Pilot D before January 1, 2026.

J. Provide the anticipated date by which CenterPoint anticipates beginning construction on the electrolyzer component of Pilot D. If only an estimate is available, provide the estimate.

K. Provide the anticipated date by which CenterPoint anticipates beginning construction on the solar array component of Pilot D. If only an estimate is available, provide the estimate.

L. Provide an updated budget for Pilot D that excludes PTCs but includes ITCs.

M. Provide an updated budget for Pilot D that excludes any savings from either PTCs or ITCs.

N. Admit that if enacted 119th Congress, H.R. 1 - One Big Beautiful Bill Act, SEC. 112013, as Engrossed in the House on May 22, 2025, would prevent Pilot D from qualifying for PTCs.

1. If your response to Part N is anything other than an unqualified admission, provide all bases for denial.

O. Admit that if enacted 119th Congress, H.R. 1 - One Big Beautiful Bill Act, sec. 112009, as Engrossed in the House on May 22, 2025, would prevent Pilot D from qualifying for ITCs.

1. If your response to Part O is anything other than an unqualified admission, provide all bases for denial.

**Any responsive documents must be provided in their unlocked native format with all formulas and links intact.**

**Response:**

A. CenterPoint Energy's understanding, and original innovation plan proposal, included an estimated \$1.5 million Investment Tax Credit (for both the solar installation and the electrolyzer). Per Department of Commerce suggestion, CenterPoint Energy revised the pilot budget to instead seek the PTC for the electrolyzer and only seek the ITC for the solar array.

In the law enacted July 4, 2025, wind and solar projects are subject to a tiered eligibility structure based on construction start date for the ITC. Our

understanding is that projects that begin construction more than 12 months after enactment must be placed in service by the end of 2027 to receive the credit. Projects that begin construction within 12 months of enactment are subject to standard IRS start of construction within four years. CenterPoint Energy considers both scenarios related to the start of construction would qualify for the solar installation ITC with currently planned design.

B. The ITC and PTC cannot be combined for the same component so the Company would not seek the ITC for the electrolyzer if planning to apply for the PTC. Subject to further review of changes made by the One Big Beautiful Bill Act enacted on July 4, 2025, CenterPoint Energy does not foresee any pilot or project design changes that would be needed to the pilot as approved for it to qualify for the ITC.

C. Yes

D. Yes

E. We currently estimate placing the electrolyzer into service in 2027.

F. We currently estimate placing the solar array into service in 2027.

G. Confirmed. The approved budget assumes approximately \$2.1 million in funding, including \$1.46 million for the PTC, spread over a 10-year period.

H. No

I. No

J-K. Beginning of construction will depend on design and sourcing considerations, but is expected in 2026.

L. The estimated total cost for Pilot D has not been updated since the original Petition filed June 28, 2023. The original Pilot budget, reflecting the estimated ITC for the electrolyzer but without the PTC, is shown in Table 11 of "Exhibit D- Full Pilot Descriptions" attached. The budget will be updated as the project engineering and construction design progresses over the next year.

M. The Plan seeks to maximize savings from federal incentives. The total estimated tax credit value from the March 15, 2024 Reply Comments is \$2,120,275 (including ITC of \$660,000 for the solar array, PTC of \$895,005 for on-site solar and \$565,268 for renewable grid electricity) so excluding these savings would increase the Pilot budget by this amount.

N. We do not expect the final bill and law to prevent the Pilot from qualifying for PTCs as the interim House version may have. Our estimated beginning of construction and in-service dates appear to qualify the project for PTCs for a period of 10 years.

O. We do not expect that the Bill, as Engrossed in the House, would prevent Pilot D from qualifying for ITC since later modifications by the Senate, that removed the disqualifying language, were included in the final language signed into law.

**State of Minnesota**  
**Minnesota Office of the Attorney General**

**Utility Information Request**

Docket Number: Dkt. G-008/M-23-215 - NGIA  
Requested From: CenterPoint Energy Minnesota Gas

Date of Request: 6/25/2025  
Response Due: 7/8/2025

Analyst Requesting Information: utilityinfo@ag.state.mn.us

Type of Inquiry: Other

***If you feel your responses are trade secret or privileged, please indicate this on your response.***

| Request No. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| OAG 005     | <p><b>Reference:</b> CenterPoint Annual Report for 2024 Calendar Year at 20 – Pilot D</p> <p>CenterPoint Energy committed to engaging with the City of Mankato to identify and address community questions with the hydrogen blending project. The Company will initiate discussions with Mankato city officials in 2025 regarding the addition of hydrogen equipment to an existing CenterPoint Energy site.</p> <p><b>Request:</b></p> <p>Provide an update on the status of CenterPoint’s discussions with Mankato city officials regarding the addition of hydrogen equipment.</p> <ol style="list-style-type: none"><li>1. If CenterPoint has not yet initiated discussions with Mankato city officials, state when CenterPoint anticipates reaching out to Mankato city officials to begin these discussions.</li><li>2. If CenterPoint has initiated discussions with Mankato city officials, describe any questions, concerns, or feedback that CenterPoint has received as the result of these discussions.</li></ol> <p><b>Response:</b></p> <ol style="list-style-type: none"><li>1. CenterPoint Energy has not yet had these discussions, but expects to meet with city representatives by August of this year.</li><li>2. N/A</li></ol> |

Response By: Betsy Lang  
Title: Lead Analyst, Regulatory & Legislative  
Department: Regulatory Services  
Telephone: 612-321-4318

**State of Minnesota**  
**Minnesota Office of the Attorney General**

**Utility Information Request**

Docket Number: Dkt. G-008/M-23-215 - NGIA  
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Type of Inquiry: Other

***If you feel your responses are trade secret or privileged, please indicate this on your response.***

| Request No. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| OAG 009     | <p><b>Reference:</b> CenterPoint Annual Report for 2024 Calendar Year at 30-31 - Pilot M</p> <p>CenterPoint Energy did not begin work on this pilot in 2024. In 2025 CenterPoint Energy issued an RFP and intends to contract with qualified vendors for both the implementation and the measurement and verification components of the pilot in 2025. The selected vendor(s) will work with the Company to develop tracking for savings and spending, with initial installation of units targeted for later this year.</p> <p><b>Request:</b></p> <p>A. Provide a copy of the RFP that CenterPoint references above.</p> <p>B. State whether the RFP included any criteria or questions regarding vendors experience working with small businesses. If the answer is affirmative, provide a reference to that criteria or question.</p> <p>C. State whether the RFP included any criteria or questions regarding vendors experience working with businesses located in environmental justice areas. If the answer is affirmative, provide a reference to that criteria or question.</p> <p>D. Provide the criteria that CenterPoint plans to use to evaluate RFP responses it receives to select a vendor.</p> <p>E. Describe how the criteria that CenterPoint plans to use to evaluate RFP responses will weigh a responding vendor's experience working with small businesses.</p> <p>F. Describe how the criteria that CenterPoint plans to use to evaluate RFP responses will weigh a responding vendor's experience working with businesses located in environmental justice areas.</p> <p><b>Any responsive documents must be provided in their unlocked native format with all formulas and links intact.</b></p> <p><b>Response:</b></p> |

Response By: Betsy Lang  
Title: Lead Analyst, Regulatory & Legislative  
Department: Regulatory Services  
Telephone: 612-321-4318

A.

The RFP is attached, which includes 3 sections:

RFP Part 1) Pilot F – Industrial Methane and Refrigerant Leak Detection – Implementation

RFP Part 2) Pilot M – Commercial Hybrid Heating – Implementation

RFP Part 3) Pilot M – Commercial Hybrid Heating – Measurement and Verification

B-C.

The scope of services includes consideration of a vendor's ability to obtain a spectrum of host sites relative to business size (small, medium, large, etc.) as well as economic situation (environmental justice areas, etc.). See 3.c of Targeted Customer Outreach on page 9 of the RFP (section 2). The vendor response must include a proposal outline, with Section 4.4, Proposed Solution, including both experience and project approach to the services in Section 3.

D-E.

RFP responses are evaluated with an internal scorecard that uses criteria pertaining to the proposed solution, the experience, technical capability, project approach, team, contracting and pricing of the proposal. Experience with small businesses was considered as part of the "experience" criteria. Supplier diversity is also considered in the evaluation process.

Evaluation Criteria

Business

**Solution:** Respondent has clear vision and execution plan that will be effective and in line with CNP's expectations.

**Experience:** Respondent has strong history of executing similar engagements.

**Technical capability**

**Project approach**

**Team:** Respondent has strong and capable teams with experience and good chemistry.

Procurement

**Contracting:** Respondent provided minimal redlines and robust SOW

**Pricing:** Respondents ability to provide lowest total cost

**RFP Quality**

Response By: Betsy Lang

Title: Lead Analyst, Regulatory & Legislative

Department: Regulatory Services

Telephone: 612-321-4318

F.  
Qualitative discussions with vendors on their solution and project approach are interpreted by staff and considered in scoring of these criteria.

# **REQUEST FOR PROPOSAL**

## **Natural Gas Innovation Act**

*RFP Part 1) Pilot F – Industrial Methane and Refrigerant Leak Detection – Implementation*

*RFP Part 2) Pilot M – Commercial Hybrid Heating – Implementation*

*RFP Part 3) Pilot M – Commercial Hybrid Heating – Measurement and Verification*



CenterPoint Energy, Inc.  
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# 1. Project Background

## 1.1. Problem Statement

### Natural Gas Innovation Act

The [Minnesota Natural Gas Innovation Act](#), passed in June, 2021 by the State Legislature, establishes a regulatory framework that enables Minnesota's investor-owned natural gas utilities to invest in renewable energy resources and innovative technologies that reduce the state's greenhouse gas (GHG) emissions, and to recover associated costs determined reasonable and prudent. The legislation defines key terms and outlines the legislative intent to allow natural gas utilities to assist the state in meeting its existing renewable energy and GHG reduction goals.

NGIA allows investor-owned natural gas utilities in Minnesota to develop an "Innovation Plan" and file it with the Minnesota Public Utilities Commission (MPUC) for approval.

Innovation Plans comprise a set of pilot projects that directly deploy and/or encourage the deployment of "innovative resources", which displace or reduce the use of fossil natural gas and reduce greenhouse gas emissions associated with the natural gas system.

In July 2024, CenterPoint Energy's first Innovation Plan under the Minnesota Natural Gas Innovation Act (NGIA) was approved. The approved plan includes 17 pilot programs spanning a variety of technologies and customer segments. More information is available in Minnesota Public Utilities Commission Docket 23-215.

### RFP Focus

CenterPoint is releasing this request for proposal (RFP) for services related to two initiatives under its first Natural Gas Innovation Act (NGIA) Innovation Plan.

.

This RFP focuses primarily on the following areas:

**Part 1) Implementation services for Pilot F:** Industrial Methane and Refrigerant Leak Reduction program

**Part 2) Implementation services for Pilot M:** Commercial Hybrid Heating program

**Part 3) Measurement and Verification Services for Pilot M:** Commercial Hybrid Heating program.

Services requested through this RFP are broken into the three components listed above. Two of the components are in one pilot (pilot M). Bidders may respond to any combination of these requested services. Bidders do not need to respond to all components of the RFP. CenterPoint Energy will evaluate each component separately and will award a contract separately for each component of the RFP. This may mean

the Company awards final contracts separately to different proposers. Alternatively, the Company may award multiple components to one vendor.

## 1.2. Project Challenges

### **Part 1) Implementation services for Pilot F: Industrial Methane and Refrigerant Leak Reduction program**

CenterPoint Energy will hire a third-party vendor to conduct leak detection sweeps/surveys of participating large industrial and large commercial facilities for methane and refrigerant leaks behind the customer gas meter. After leaks are identified, the third-party vendor will provide planning support to help establish a systematic leak repair program and CenterPoint Energy will offer incentives to partially offset the cost of leak repair. Participating customers will also receive follow up leak detection surveys every two years during the term of the Plan to test how well the impacts of the leak survey on reducing methane and refrigerant leakage and subsequent repairs are sustained. While CenterPoint Energy has high confidence that this pilot will result in a substantial reduction of GHG emissions, there are several open questions that would allow for more precise estimates of GHG savings potential in different facilities and the optimal program design. Accordingly, CenterPoint Energy aims to answer two main research questions in the course of implementing this pilot:

- 1) What size and quantity of leaks are most likely to be identified on a first leak survey in different kinds of customer facilities (e.g., how much methane is leaking from customer sites, are the leaks distributed between customers or concentrated in just a few sites, etc.)?
- 2) What are the quantity and size of leaks most likely to be identified on a follow-up survey two years later and four years later (e.g., have the original leaks been repaired, were any repairs sustained, how many new leaks have occurred in a two-year window)?

Answering these two questions will allow CenterPoint Energy to more accurately estimate GHG emissions reductions resulting from leak identification and repair, the best facilities to target with a program like this, and how often surveys should be repeated. More information is included in our NGIA Innovation Plan Filing, Exhibit D.

Please note that while the program's title includes methane and refrigerant leak reduction, the Company is principally concerned with methane leak reduction. Thus, while the Company would prefer that the pilot reduce leaks for customers from both fugitive emission sources, the refrigerant leak reduction component of the pilot may or may not be a large part of the eventual pilot depending on the details of the responses received in the RFP.

### **Part 2) Implementation services for Pilot M: Commercial Hybrid Heating program**

### *Project Description*

CenterPoint Energy will hire a third-party vendor via this RFP to provide support for commercial buildings interested in replacing existing Heating, Ventilation, and Air Conditioning (“HVAC”) systems with hybrid systems using electric heat pumps and gas backup. The pilot would focus on dual-fuel rooftop units (DF RTUs) but may support installation of other decentralized hybrid heating systems (e.g., split system hybrid heat pumps). Vendor services include targeted customer outreach, technical support for project sizing and design, custom savings calculations, and direct installation of hybrid heating systems using a network of participating trade allies. More information is included in our NGIA Innovation Plan Filing, Exhibit D.

### **Part 3) Measurement and Verification Services for Pilot M: Commercial Hybrid Heating program**

CenterPoint Energy will hire a third-party vendor to conduct measurement and verification (M&V) activities for the dual fuel heating systems installed via Pilot M (described in Part 2 of this RFP). The vendor providing M&V services could be the same vendor as supporting implementation for this pilot (part 2 of the RFP) or a different vendor. The company seeks to address the following questions as a result of the M&V activities:

1. What are the measured capacities and efficiencies (COPs) of the Minnesota-installed units, and how do they compare to the manufacturer’s listed values?
2. How do the controls work on these units, and do they effectively integrate the outputs from both heating sources?
3. Do the units perform substantially differently in different commercial building segments?
  - a. Are there segments of the commercial building market that are better applications for standard DF RTUs (i.e., single stage motor)?
  - b. Are there segments of the commercial building market that better justify the additional up-front expense of cold climate DF RTUs (i.e., variable speed motor)? The cold climate RTUs are expected to make up  $\leq 20\%$  of the overall units installed through this pilot.

### **1.3. Project Goals**

#### **Part 1) Implementation services for Pilot F: Industrial Methane and Refrigerant Leak Reduction program**

#### Participation Estimates

|                                      | Year 1 | Year 2 | Year 3 | Year 4 | Year 5 |
|--------------------------------------|--------|--------|--------|--------|--------|
| Customers Receiving Initial Survey   | 25     | 25     | 0      | 0      | 0      |
| Customers Receiving Follow-Up Survey | 0      | 0      | 25     | 25     | 25     |

#### GHG and Geologic Gas Savings

|                                                                   | Total Measure Lifetime* |
|-------------------------------------------------------------------|-------------------------|
| Lifecycle GHG Emissions Reduction (metric tons CO <sub>2</sub> e) | 33,763                  |
| Geologic Gas Savings (Dth)                                        | 75,351                  |

\* Assumes 5-year measure lifetime and multiple lifecycle emissions factors due to the avoided fugitive methane emissions.<sup>1</sup>

The GHG goals are ultimately more important than the participation estimates; thus, the participation noted above has some flexibility if the RFP respondent has a different, and justifiable, estimate of how much GHG emissions could be reduced per customer site.

### Part 2) Implementation services for Pilot M: Commercial Hybrid Heating program

#### Participation Estimates

|                                             | Year 1 | Year 2 | Year 3 | Year 4 | Year 5 |
|---------------------------------------------|--------|--------|--------|--------|--------|
| Customers installing hybrid heating systems | 15     | 30     | 30     | 30     | 30     |

#### GHG and Geologic Gas Savings

|                                                                                             | Total Measure Lifetime* |
|---------------------------------------------------------------------------------------------|-------------------------|
| Net Lifecycle GHG Emissions Reduction (metric tons CO <sub>2</sub> e over project lifetime) | 25,609                  |
| Geologic Gas Savings (Dth)                                                                  | 400,950                 |

<sup>1</sup> The GHG savings estimates shown here from the initial pilot design assumed that on average, each participating facility will reduce annual methane leaks by 301 Dth/year, representing roughly 0.25 percent of the annual gas consumption for CenterPoint's largest industrial and commercial customers. These assumptions were made in an area where there is a lot of uncertainty, and an important objective of this pilot is to quantify the leaks that are identified so that actual reductions can be reported for NGIA savings. More details on the initial GHG quantification for this pilot can be found in Exhibit F: Lifecycle GHG Calculation Details from CenterPoint's June 28, 2023 NGIA filing (Docket No. G-008/M-23-215). Note that RFP respondents do not necessarily need to follow this exact GHG quantification approach if alternative assumptions and/or approaches are justifiable and aligned with NGIA requirements.

\* Assumes 15-year measure lifetime and lifecycle emissions factor of 66.14 kg/Dth for natural gas as well as a declining emissions rate for the electric grid; to account for the emissions added from the increased electric consumption.

The GHG emission reduction goals and auxiliary goals such as testing a range of building segments and Tiers of DF RTUs are ultimately more important than the participation estimates; thus, the participation noted above has some flexibility if the RFP respondent estimates that the primary goals could be achieved with a different, and justifiable, number of installed systems.

### **P Part 3) Measurement and Verification Services for Pilot M: Commercial Hybrid Heating program**

Estimate of Units Measured

|                                | Year 1 | Year 2 | Year 3 | Year 4 | Year 5 |
|--------------------------------|--------|--------|--------|--------|--------|
| Units with detailed monitoring | 2      | 3      | 3      | 3      | 3      |
| Units with simple monitoring   | 7      | 15     | 15     | 15     | 15     |

The M&V unit measurement goals for detailed and simple monitoring are percentages of the DF RTU installation goals (10% and 50%, respectively). Thus, if the actual installations per year differ from the estimates, the M&V units measured per year will change commensurately.

For the component(s) to which they respond, CenterPoint fully expects suppliers to provide a comprehensive solution that meets or exceeds all requirements as stated in this RFP. CenterPoint would also be open to considering other ideas or refinements to the approach to the pilots outlined in this RFP if the respondents felt such changes would be warranted (i.e., to achieve desired goals more thoroughly or cost-effectively).

## **2. Tentative RFP Schedule**

| Event                                         | Date             | Time      |
|-----------------------------------------------|------------------|-----------|
| RFP Launch                                    | 1/13/2025        |           |
| Questions to be submitted in the Q&A Template | 2/3/2025         | By 6pm CT |
| Answers to questions sent from CNP            | 2/10/2025        |           |
| Proposals Due                                 | 2/24/2025        | 6 pm CT   |
| Finalist Follow Up's                          | Early March 2025 |           |
| Final Contract Negotiations                   | Late March 2025  |           |

## 3. Services

### 3.1. Scope

#### Part 1 of Services) Pilot F: Industrial Methane and Refrigerant Leak Detection Program

1. Program planning and launch:
  - a. Conduct a series of meetings with CenterPoint Energy to plan for program implementation and launch
  - b. Develop an agreed upon launch plan
2. Customer recruitment:
  - a. Work with CenterPoint Energy to target and recruit customers to sign up for the program.
    - i. There will be Company marketing resources devoted to communicating this pilot to appropriate customers.
    - ii. By the pilot's launch, the Company will have a list of customers who have indicated interest in participating in this pilot.
    - iii. These Company resources should be helpful in customer recruitment but will not be sufficient in themselves to complete the customer recruitment process.
3. Leak detection site visit(s):
  - a. Work with customer to plan and prepare for site visit
  - b. Conduct site visit(s) to conduct the methane leak detection sweeps, and, as applicable, refrigerant leak detection sweeps. Areas to be swept include outdoor piping, indoor piping, and the end-use appliances.
  - c. Determine a threshold where an immediate leak repair is required.
4. Customer report:
  - a. Provide customer with a report of leak detection sweep results
5. Leak repair assistance:
  - a. Assist customer with prioritization of leak repairs and development of a plan to conduct the repairs
  - b. Communicate availability of CenterPoint Energy incentives for completed repairs
6. Measurement and verification:
  - a. Quantify baseline leak volumes and rates, quantify GHG reduction impact of leak repairs, conduct follow-up sweeps every two years following initial sweep to assess durability of repairs and ongoing levels of leakage.
7. Program performance data collection and reporting:
  - a. On an ongoing basis, track the details for the annual reporting requirements (i.e., GHG savings, leak statistics, pilot participation, costs incurred, etc.)
8. Project management, coordination with CenterPoint Energy:

- a. Hold regular meetings with CenterPoint Energy team to deliver progress updates and address implementation issues and program improvement opportunities.

Part 2 of Services) Pilot M: Implementation services for Pilot M: Commercial Hybrid Heating program

1. Program planning and launch:
  - a. Conduct a series of meetings with CenterPoint Energy and the measurement and verification (M&V) vendor to plan for program implementation and launch
  - b. Develop an agreed upon launch plan
  - c. Agree to a process with the M&V vendor that coordinates the installation of the M&V instrumentation with the installation of the DF RTUs themselves
2. Direct install contractors
  - a. In consultation with the Company, select network of direct install contractors and train them as appropriate.
3. Targeted customer outreach
  - a. Work with CenterPoint Energy to target and recruit customers to sign up for the program.
  - b. One technical consideration for host site recruitment will be to obtain a wide array of commercial segments (office, retail, schools, etc.) to be able to see how the DF RTUs operate in different applications.
  - c. Another consideration will be to obtain a spectrum of host sites relative to business size (small, medium, large, etc.) as well as economic situation (environmental justice areas, etc.).
4. Technical support for project sizing and design
  - a. Work with customer and/or design professionals representing the customer to match the appropriate DF RTU, or other hybrid heating system as applicable, to the site.
5. Technical support for contractors
  - a. Direct, as needed, the contractors in the installation of these units
6. Savings calculations
  - a. Perform custom savings calculations for the installations which will include both gas saved, and electricity added as a result of the DF RTU installation.
    - i. Minnesota TRM 4.2 has a new DF RTU savings algorithm that could be used, perhaps in conjunction with some site-specific information, for the units that are not M&V'd.
7. Program performance data collection and reporting:
  - b. Track the details for the annual reporting requirements (i.e., gas saved, electricity added, GHG savings, costs incurred, economic impact including

job creation, pilot participation, system tonnage, IRA incentive eligibility etc.)

8. Project management, coordination with CenterPoint Energy:
  - c. Hold regular meetings with CenterPoint Energy team to deliver progress updates and address implementation issues and program improvement opportunities.
9. IRA tracking:
  - d. Work with customer and others to determine whether a customer qualifies for potential IRA or IIJA funding, including grants, tax credits, or tax deductions and/or other funding, as a result of the installation of hybrid heating system(s) as part of this pilot.
  - e. Determination of IRA funding eligibility may have ramifications for the project cost allocation between customer and Company.

Part 3 of Services) Measurement and Verification Services for Pilot M: Commercial Hybrid Heating program.

1. Program planning and launch:
  - a. Conduct a series of meetings with CenterPoint Energy and the implementation vendor to plan for program implementation and launch
  - b. Develop an agreed upon launch plan
  - c. Agree to a process with the implementation vendor that coordinates the installation of the M&V instrumentation with the installation of the DF RTUs themselves
2. Conduct M&V activities in two categories:
  - a. Detailed monitoring and analysis of roughly 10% of the installed units (~3-4 per year). This will include instrumentation that will allow for the capture of COPs and capacities of these units across different temperature ranges
  - b. Simple monitoring and analysis of roughly 50% of the installed units (~15 per year). This will include instrumentation that will capture the heating load of the space as well as the operation of the unit's controls.
3. Program performance data collection and reporting:
  - a. Track the details for the annual reporting requirements (i.e., gas saved, electricity added, GHG savings, costs incurred, economic impact including job creation, pilot participation, system tonnage, etc.)
4. Project management, coordination with CenterPoint Energy:
  - a. Hold regular meetings with CenterPoint Energy team to deliver progress updates and address implementation issues and program improvement opportunities.

### **3.2. Key Performance Indicators (“KPI’s”)**

See participation and GHG reduction goals noted above in Section 1.3.

Proposals may propose alternative participation and/or GHG goals as feasible.

### External delivery budget for each component of RFP

| RFP Component                                                                        | 5-year pilot budget for Implementer (Maximum) |
|--------------------------------------------------------------------------------------|-----------------------------------------------|
| Pilot F: Industrial Methane and Refrigerant Leak Detection Program                   | \$1,250,183                                   |
| Pilot M: Implementation services for Commercial Hybrid Heating program **            | \$1,485,000                                   |
| Pilot M: Measurement and Verification Services for Commercial Hybrid Heating program | \$505,000                                     |

\*\* The budget for this component is based, in part, on the Company incentive for DF RTU installations outlined in the Plan Filing. The filed incentive from the Company was assumed to cover 40% of the project costs. The respondent has flexibility to suggest a different incentive rate if they feel such a change would result in the pilot's goals being achieved in a better way.

### 3.3. Assumptions

Vendor must meet all regulatory requirements and Commission Orders as described in Minnesota Public Utilities Commission Docket 23-215.

## 4. Proposal Outline

Each proposal must contain all of the information set forth below and be presented in the order set forth below. Each proposal will be signed by an individual duly authorized to legally bind the Respondent.

### 4.1. Title Page

The title page of the proposal must include the Project Name, the name and address of the Respondent, and the date of the proposal.

### 4.2. Executive Summary

1. A brief statement of the Respondent's understanding of the items to be provided under this RFP.
2. The name, title, address, and telephone number of each individual who is authorized to make representations on behalf of the Respondent.

3. A statement that:

- the price listed in the proposal is the total cost for the items to be provided under the proposal;
- the individual signing the proposal is duly authorized to legally bind the Respondent;
- the proposal and the price contained therein shall remain firm for a period of one hundred and eighty (180) days;
- the proposal complies with all requirements under this RFP; and acknowledges: (i) that the Respondent has read and understands the requirements of this RFP; (ii) that the Respondent has carefully examined the conditions and factors that may impact the provision of the items under this RFP; (iii) that the Respondent agrees with the terms and conditions of this RFP; and (iv) that the Company shall not be responsible for any error or inaccuracy in this RFP or any cost associated with the submission of items under this RFP.

#### 4.3. Company Information

Provide a brief overview of your company. This should include the items below at a minimum:

- Age of business
- Number of employees
- Annual Revenue
- Public or Private
- How many customers you currently support
- Recent acquisitions
- Other areas of business

#### 4.4. Proposed Solution

In this section, Respondents must provide a clear and detailed description of the products and or services to be provided. We are seeking a high-level description of your overall approach to executing this project and any key details.

This section should include the topics below at a minimum:

- Team and Relevant Experience:

Proposers are required to demonstrate project management capability, relevant technical expertise and experience, and sufficient experienced staff capacity to conduct requested services. Proposals are required to provide the following information:

- An organizational chart that identifies the corporate structure and lists Proposer's leadership. Any partnerships and/or subcontractors Proposer intends to involve should also be similarly documented.
- A management chart that lists the key personnel dedicated to this project, their roles and responsibilities for this project, their resumes and their roles and responsibilities with substantially similar projects.
- A description of similar projects Proposer has successfully managed and delivered, and any other relevant experience.
- Description of Proposer's familiarity with CenterPoint Energy Minnesota's service territory and operations and regulatory systems.
- CenterPoint Energy will seek diverse and qualified vendors to participate in an RFP process to select an implementation provider. CenterPoint Energy defines diverse suppliers per the guidelines of the National Minority Supplier Development Council, the Women's Business Enterprise National Council and the U.S. Small Business Administration. Please describe whether your company or any subcontractors meet these guidelines.
- Approach to Scope
  - Describe your approach to each element of the scope described in Section 3.1 above. Vendors may propose changes to the scope that they deem valuable to the program's success.
  - Provide estimated duration and timing for each component of customer services (e.g., one month to schedule/plan visits, X weeks to prepare customer report)

If bidding on multiple parts of this RFP, please submit the above information in separate sections for each part.

- 
- Proposed pricing structure:
  - Provide detail on your proposed pricing structure and cost breakdown.
  - If bidding on multiple parts of this RFP, please separate costs for each part.

#### **4.5. Account Management**

This section should include any key details regarding how our account will be managed to ensure a high level of service. Please provide all team members who will manage the relationship with CenterPoint and key details including but not limited to names, headshot, time with company, roles/responsibilities.

#### **4.6. Pricing**

The Company seeks a clear and comprehensive understanding of all costs associated with this project.

In addition to the proposed pricing structure contained in your proposal, total cost should be provided under the “Items and Services” section of Coupa under the “Details” tab. The bidder has some flexibility in their chosen pricing structure (i.e., time and materials vs fixed fee, etc.); however, assumptions in pricing structure must be clearly stated in RFP response. If bidding on multiple parts of this RFP, please add separate line items for each part. All information should be provided as requested.

All elements of recurring and non-recurring costs that must be borne by CenterPoint Energy shall be accounted for in the total cost. This includes but is not limited to labor, systems, documentation, consultation, training, conversion services, travel expenses, acceptance testing, taxes, etc.

You must state all significant assumptions used in developing the estimation of costs presented and details of assumed expected CenterPoint responsibilities/resource needs. Respondent must include information regarding any other financial consideration reducing the overall cost to CenterPoint (e.g., prompt payment incentives).

#### **4.7. Service Level Agreements (“SLA’s”)**

Provide your proposed list of Service Level Agreements and describe how these directly influence CenterPoint’s objectives and challenges.

#### **4.8. Subcontractors**

Provide the information below with respect to each direct, first-tier subcontractor that Respondent intends to retain to perform a material portion of the work with respect to the Project:

- Formal Entity Name;
- Number of Years in Business;
- Name of CEO;
- Data Universal Number System (DUNS) Number.

Respondent shall not subcontract any material portion of such work to such subcontractors unless: (1) such subcontractors have been expressly approved in writing by the Company; and (2) such subcontractors have signed and delivered to the Company a Confidentiality Agreement provided by the RFP contact.

#### **4.9. References**

Please provide 2-3 references including at least 1 utility and 1 Fortune 500 Company. For each reference, please describe the services you provided, the relevance of those

services to the scope in this RFP, the length of the engagement, the value you have provided, and a point of contact.

#### **4.10. Additional Information or Comments**

This section may include financial statements, credit reports, and technical data that Respondent reasonably thinks will assist the Company in evaluating the proposal. **Respondents shall not include any sales brochures in this section.**

## **5. Commercial**

### **5.1. Statement of Work**

The requirements listed for each of the RFP components in this RFP Summary Document will be used as the basis for any SOW. Your inability to meet any of these requirements must be clearly stated in the submitted proposal.

### **5.2. Pro Forma Agreements**

The pro forma agreements in Coupa set forth the terms and conditions of a potential agreement between the Company and a Respondent with respect to this RFP. The Company is not required to enter into definitive agreements containing the terms set forth in the pro forma agreements with any Respondent. The Company is entitled to consider, in its sole discretion, modifications to the pro forma agreements proposed by Respondent or the Company.

Each Respondent who does not have a current and valid master agreement in place with CenterPoint Energy must submit a mark-up, in redline format, of the pro forma agreements, which must include all requested modifications to the pro forma agreements. The electronic copy of the mark-ups must be provided in a separate file and in a format capable of being opened in Microsoft Word. All mark-ups must be received in Coupa.

The Company reserves the right to reject any and all such proposed modifications. The Company considers the terms and conditions of the pro forma agreements to be an essential component of the potential transactions between the Company and a Respondent. Accordingly, Respondents should note that the extent of a Respondent's proposed modifications to the pro forma agreements may be a significant consideration as the Company evaluates a Respondent's proposal against those of other Respondents.

**State of Minnesota**  
**Minnesota Office of the Attorney General**

**Utility Information Request**

Docket Number: Dkt. G-008/M-23-215 - NGIA  
Requested From: CenterPoint Energy Minnesota Gas

Date of Request: 6/25/2025  
Response Due: 7/8/2025

Analyst Requesting Information: utilityinfo@ag.state.mn.us

Type of Inquiry: Other

***If you feel your responses are trade secret or privileged, please indicate this on your response.***

| Request No. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| OAG 010-P   | <p><b>Reference:</b> CenterPoint Annual Report for 2024 Calendar Year at 34 - Pilot O: “In 2024, CenterPoint Energy executed a contract with a vendor for implementation of this pilot. Customers began receiving audits in early 2025.”</p> <p><b>Request:</b></p> <p>A. State whether CenterPoint’s selection process for the vendor included an assessment or consideration of that vendor’s experience working with small businesses.</p> <p>B. Provide any information CenterPoint obtained regarding the vendor’s experience working with small businesses prior to selection.</p> <p>C. Provide a list of the customers who have received audits to date.</p> <p>D. For each customers listed in response to part C above, state whether CenterPoint considers that customer a “small business” or a “medium business.”</p> <p>E. Provide CenterPoint’s definition of “small business” for the purposes of Pilot O.</p> <p>F. Provide CenterPoint’s definition of “medium business” for the purposes of Pilot O.</p> <p><b>Any responsive documents must be provided in their unlocked native format with all formulas and links intact.</b></p> <p><b>Response:</b></p> <p>A. Pilot O was an extension of an existing ECO program to include decarbonization measures. The contract with the current vendor was amended based on positive performance with this market in the existing ECO program.</p> <p>B. As stated in Part A, the selection was based off expanding current ECO programs and experience with the current vendor.</p> <p>C. CenterPoint has executed 84 NGEA/NGIA audits please see</p> |

Response By: Betsy Lang  
Title: Lead Analyst, Regulatory Affairs  
Department: Regulatory Services  
Telephone: 612-321-4318

attached "2025 NGIA YTD customer rate class data append  
(2025-07-01)

- D. Please see attached "2025 NGIA YTD customer rate class data  
append (2025-07-01)
- E. Customers listed in the Firm A (less than 1,500 therms per year)  
or Firm B (1,500 to 4,999 therms per year) rate class
- F. Customers listed in the Firm C (5,000 therms or more per year)  
rate class

PUBLIC DOCUMENT  
NOT PUBLIC DATA HAS BEEN EXCISED

Docket No. G-008/M-23-215  
OAG Initial Comments  
Attachment 4, Page 3 of 3

Docket No. G-008/GR-23-215  
OAG\_IR 10

Public Document  
Trade Secret Information has been excised

Customer Rate Class Count  
Small 43  
Medium 38  
Large 3  
Total 84

| [Trade Secret Data Begins...] |                |                   |         |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
|-------------------------------|----------------|-------------------|---------|------------------------|-------------|-------------------|-----------------|-----------------|--------------------|----------------|---------------------------------|---------|---------------------|-------------|-------------------|-----------------|-----------------|--------------------|-----------|-------------------|--------|
| January                       | P3 Property Id | Property Name     | Address | Service Type           | Ad-Hoc Type | Connection Object | Primary Premise | Primary Account | Alternate Accounts | Rate Category  | Text                            | Note    |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N6032-2      | Com Firm Transportation F       | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4032-2      | Com/Ind Firm Rate               | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4012-2      | Com/Ind Firm Rate               | Small   |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4032-2      | Com/Ind Firm Rate               | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4022-2      | Com/Ind Firm Rate               | Small   |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4032-2      | Com/Ind Firm Rate               | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4032-2      | Com/Ind Firm Rate               | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
| February                      | P3 Property Id | Property Name     | Address | Service Type           | Ad-Hoc Type | Connection Object | Primary Premise | Primary Account | Alternate Accounts |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4012-2      | Com/Ind Firm Rate               | Small   |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4012-2      | Com/Ind Firm Rate               | Small   |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Basic Audit            |             |                   |                 |                 |                    | M_N4012-2      | Com/Ind Firm Rate               | Small   |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Basic Audit            |             |                   |                 |                 |                    | M_N4012-2      | Com/Ind Firm Rate               | Small   |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Basic Audit            |             |                   |                 |                 |                    | M_N4012-2      | Com/Ind Firm Rate               | Small   |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4012-2      | Com/Ind Firm Rate               | Small   |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Basic Audit            |             |                   |                 |                 |                    | M_N4012-2      | Com/Ind Firm Rate               | Small   |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Basic Audit            |             |                   |                 |                 |                    | M_N4012-2      | Com/Ind Firm Rate               | Small   |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4012-2      | Com/Ind Firm Rate               | Small   |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Basic Audit            |             |                   |                 |                 |                    | M_N4012-2      | Com/Ind Firm Rate               | Small   |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Basic Audit            |             |                   |                 |                 |                    | M_N4012-2      | Com/Ind Firm Rate               | Small   |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4012-2      | Com/Ind Firm Rate               | Small   |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4032-2      | Com/Ind Firm Rate               | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4022-2      | Com/Ind Firm Rate               | Small   |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4032-2      | Com/Ind Firm Rate               | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N1001-1      | Residential Rate                | Small   |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4032-2      | Com/Ind Firm Rate               | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4032-2      | Com/Ind Firm Rate               | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4012-2      | Com/Ind Firm Rate               | Small   |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4022-2      | Com/Ind Firm Rate               | Small   |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4032-2      | Com/Ind Firm Rate               | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4012-2      | Com/Ind Firm Rate               | Small   |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4032-2      | Com/Ind Firm Rate               | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4032-2      | Com/Ind Firm Rate               | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4012-2      | Com/Ind Firm Rate               | Small   |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4032-2      | Com/Ind Firm Rate               | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4032-2      | Com/Ind Firm Rate               | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4022-2      | Com/Ind Firm Rate               | Small   |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4032-2      | Com/Ind Firm Rate               | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4022-2      | Com/Ind Firm Rate               | Small   |                     |             |                   |                 |                 |                    |           |                   |        |
| March                         | P3 Property Id | Property Name     | Address | Service Type           | Ad-Hoc Type | Connection Object | Primary Premise | Primary Account | Alternate Accounts |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4022-2      | Com/Ind Firm Rate               | Small   |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4032-2      | Com/Ind Firm Rate               | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4032-2      | Com/Ind Firm Rate               | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4032-2      | Com/Ind Firm Rate               | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4022-2      | Com/Ind Firm Rate               | Small   |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4022-2      | Com/Ind Firm Rate               | Small   |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4032-2      | Com/Ind Firm Rate               | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4032-2      | Com/Ind Firm Rate               | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4032-2      | Com/Ind Firm Rate               | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4032-2      | Com/Ind Firm Rate               | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4032-2      | Com/Ind Firm Rate               | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4032-2      | Com/Ind Firm Rate               | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4032-2      | Com/Ind Firm Rate               | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Audit    |             |                   |                 |                 |                    | M_N4032-2      | Com/Ind Firm Rate               | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
| April                         | P3 Property Id | Property Name     | Address | Service Type           | Ad-Hoc Type | Connection Object | Primary Premise | Primary Account | Alternate Accounts |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Analysis |             |                   |                 |                 |                    | M_N4032-2      | Com/Ind Firm Rate               | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Analysis |             |                   |                 |                 |                    | M_N4022-2      | Com/Ind Firm Rate               | Small   |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Analysis |             |                   |                 |                 |                    | M_N4012-2      | Com/Ind Firm Rate               | Small   |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Analysis |             |                   |                 |                 |                    | M_N4032-2      | Com/Ind Firm Rate               | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Analysis |             |                   |                 |                 |                    | M_N4032-2      | Com/Ind Firm Rate               | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Analysis |             |                   |                 |                 |                    | M_N4032-2      | Com/Ind Firm Rate               | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Analysis |             |                   |                 |                 |                    | M_N4022-2      | Com/Ind Firm Rate               | Small   |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Analysis |             |                   |                 |                 |                    | M_N7000        | Small Volume Dual Fuel Ra       | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Analysis |             |                   |                 |                 |                    | M_N7000        | Small Volume Dual Fuel Ra       | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Analysis |             |                   |                 |                 |                    | M_N4022-2      | Com/Ind Firm Rate               | Small   |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Analysis |             |                   |                 |                 |                    | M_N8000        | Small Volume Dual Fuel Ra Large | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Analysis |             |                   |                 |                 |                    | M_N4022-2      | Com/Ind Firm Rate               | Small   |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Analysis |             |                   |                 |                 |                    | M_N7000        | Small Volume Dual Fuel Ra       | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Analysis |             |                   |                 |                 |                    | M_N7000        | Small Volume Dual Fuel Ra       | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Analysis |             |                   |                 |                 |                    | M_N8000        | Small Volume Dual Fuel Ra Large | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | Comprehensive Analysis |             |                   |                 |                 |                    | M_N4032-2      | Com/Ind Firm Rate               | Medium  |                     |             |                   |                 |                 |                    |           |                   |        |
|                               |                |                   |         | May                    |             |                   |                 |                 |                    | P3 Property Id | Property Name                   | Address | Service Type        | Ad-Hoc Type | Connection Object | Primary Premise | Primary Account | Alternate Accounts |           |                   |        |
|                               |                |                   |         |                        |             |                   |                 |                 |                    |                |                                 |         | Comprehensive Audit |             |                   |                 |                 |                    | M_N4032-2 | Com/Ind Firm Rate | Medium |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4032-2      | Com/Ind Firm Rate | Medium  |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           | M_N4022-2      | Com/Ind Firm Rate | Small   |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |
| Comprehensive Audit           |                |                   |         |                        |             |                   |                 |                 |                    |                |                                 |         |                     |             |                   |                 |                 |                    |           |                   |        |