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May 1, 2024

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

Michelle Gransee
Deputy Commissioner, Division of Energy Resources
Minnesota Department of Commerce
85 Seventh Place East, Suite 280
St. Paul, MN 55101-2198

RE: Natural Gas Conservation Improvement Program 2023 Status Report & Associated
Compliance Filings
Docket No. G-008/CI-10-111
Docket No. G-008/CIP-20-478
Docket No. G-008/M-24-____

Dear Executive Secretary and Deputy Commissioner:

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, (“CenterPoint Energy” or the “Company”) respectfully submits to the Minnesota Public Utilities Commission (“Commission”) and the Minnesota Department of Commerce, Division of Energy Resources (“Department”), its aggregated compliance filing, which includes its *2023 Conservation Improvement Program Status Report; 2023 Demand-Side Management Financial Incentive Report; Conservation Improvement Program Tracker Report* for the period of January 1, 2023, through December 31, 2023; and its request to increase the Conservation Cost Recovery Adjustment (“CCRA”) to \$0.1704 per dekatherm (“Dth”), to become effective October 1, 2024. This filing complies with the Commission’s Orders in *In the Matter of the Commission Review of Utility Performance Incentives for Energy Conservation*,¹ Conservation Improvement Program (“CIP”) regulations requiring CenterPoint Energy to submit an annual CIP Status report,² and the

¹ Docket No. E,G-999/CI-08-133.

² Minn. R. § 7690.0550.

Commission's requirement that CenterPoint Energy submit its CIP Adjustment filing annually in conjunction with its CIP Tracker Report and DSM Financial Incentive filing.³

For the fifteenth consecutive year, CenterPoint Energy surpassed its energy savings goals. The Company achieved 2,009,051 Dth of first-year energy savings, representing 1.35 percent of its average retail sales and 105 percent of its approved goal for 2023. Program expenditures were \$41,484,184, or slightly over 100 percent of the approved 2023 budget. Under the mechanism approved by the Commission,⁴ this level of performance qualifies the Company for a financial incentive of \$8,450,662.

CenterPoint Energy was assessed by the Department of Commerce a total of \$694,872 under Minnesota Statute § 216B.241. These assessments are recoverable under Minnesota Statute § 216B.241 through the CIP Tracker mechanism. Combining total assessments, alternative CIP expenditures in 2023 (\$531,834), and 2023 program expenditures results in total deferred expenses on the CIP Tracker account of \$42,016,018. The Company also requests approval of its 2023 CIP carrying charges. Because the Company's 2023 CIP Tracker account was over-recovered for most of the year, total annual carrying charges accrued in favor of customers. The carrying charges were credited to the CIP Tracker account, reducing the total year-end under-recovered balance. Total annual carrying charges of \$19,737 were credited to the 2023 CIP Tracker account in the customers favor, resulting in a year-end, under-recovered CIP Tracker balance of \$6,131,707.

The Commission has ordered CenterPoint Energy to file its CIP Adjustment with its annual CIP Tracker and DSM Financial Incentive filings.⁵ The Company requests approval to increase the CCRA to \$0.1704 per Dth, to go into effect on October 1, 2024. The Company projects this increased CCRA will achieve a near-zero CIP Tracker balance by the end of 2025. Section 4 of this filing describes the Company's CCRA proposal in more detail.

Please address requests to receive a copy of the filing, as well as comments or questions regarding the Status Report, to Tyler Glewwe at tyler.glewwe@centerpointenergy.com or (612) 321-4905.

Sincerely,

/s/ Tyler Glewwe

³ *In the Matter of a Petition by CenterPoint Energy, A Division of CenterPoint Energy Resources Corp., for Approval of its 2009 CIP Tracker Account and DSM Financial Incentive*, Docket No. G-008/M-10-416, G-008/M-10-634, Ordering Point 4 (Oct. 11, 2010).

⁴ *In the Matter of Commission Review of Utility Performance Incentives for Energy Conservation Pursuant to Minn. Stat. § 216B.241, Subd. 2c*, Docket No. E,G-999/CI-08-133, Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan (Dec. 9, 2020).

⁵ *In the Matter of a Petition by CenterPoint Energy, A Division of CenterPoint Energy Resources Corp., for Approval of its 2009 CIP Tracker Account and DSM Financial Incentive*, Docket No. G-008/M-10-416, G-008/M-10-634, Ordering Point 4 (Oct. 11, 2010).

Tyler Glewwe
Regulatory Analyst, Conservation Improvement Program

CC: Service List

CENTERPOINT ENERGY
SUMMARY OF FILING
Rule 7829.1300, Subp. 1

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, (“CenterPoint Energy” or the “Company”) submits its *2023 Conservation Improvement Program Status Report* and associated filings. In addition to the Status Report, this filing includes a request for approval of the Company’s December 31, 2023, Conservation Improvement Program (“CIP”) Tracker under-recovered balance of \$6,131,707; a request for approval of a 2023 CIP Financial Incentive in the amount of \$8,450,662 (to be credited to the CIP Tracker account upon receipt of approval from the Minnesota Public Utilities Commission); and a request for approval of updates to the Company’s tariff book to incorporate the requested Conservation Cost Recovery Adjustment factor of \$0.01704 per therm.

CENTERPOINT ENERGY
SUMMARY OF FILING
Rule 7829.1300, Subp. 3

A. The name, address, and telephone number of the utility:

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas,
a Delaware Corporation
505 Nicollet Mall
PO Box 59038
Minneapolis, Minnesota 55402
(612) 321-4324

B. The name, address, and telephone number of the attorney for the utility:

Jason T. Loos, Associate General Counsel
505 Nicollet Mall
Minneapolis, Minnesota 55402
(612) 321-4410

C. The date of the filing and the date the proposed rate or service change will take effect:

Date Filed: May 1, 2024
Effective Dates: October 1, 2024 (Conservation Cost Recovery Adjustment)
Upon receipt of Commission approval (Financial Incentive)

D. The statute the utility believes controls the timeframe for processing the filing:

CenterPoint Energy is unaware of any statute or rule that controls the timeframe
for processing this filing.

E. The signature and title of the utility employee responsible for this filing:

/s/
Tyler J. Glewwe
Regulatory Analyst, Conservation Improvement Program
(612) 321-4905

AGGREGATED COMPLIANCE REPORTS OVERVIEW

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, (“CenterPoint Energy” or the “Company”) submits its *2023 Conservation Improvement Program Status Report* and associated compliance reports. The purpose of the filing is to report 2023 Conservation Improvement Program (“CIP”) project activity, to request approval to allocate the 2023 Financial Incentive to CenterPoint Energy’s CIP Tracker, to update CIP Tracker activity from January 1, 2023, through December 31, 2023, to request approval of the CIP Tracker balance, and to request approval of the Company’s proposed Conservation Cost Recovery Adjustment.

This filing is an aggregation of four compliance reports. The filing is divided into five sections consisting of the following compliance reports and their corresponding attachments:

- Section 1. 2023 Conservation Improvement Program Status Report;
- Section 2. 2023 Demand-Side Management Financial Incentive Report;
- Section 3. Conservation Improvement Program Tracker Report;
- Section 4. Conservation Cost Recovery Adjustment Proposal; and
- Section 5. Attachments.

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SECTION 1: 2023 CONSERVATION IMPROVEMENT PROGRAM **STATUS REPORT**

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, (“CenterPoint Energy” or the “Company”) submits this Status Report on its Conservation Improvement Program (“CIP”) in compliance with Minnesota Department of Commerce (“Department”) Rules and the Commissioner’s Decisions. This report covers the 2023 CIP year, January 1 through December 31. The report is divided into five sections:

- I. Summary of Accomplishments
- II. Minority and Women Business Enterprise Vendors
- III. Update of Program Modifications
- IV. Compliance Overview
- V. 2023 CIP Results

Summary of Accomplishments

CenterPoint Energy's commitment to helping its customers achieve cost-effective energy savings was the driving force behind the Company's successful 2023 CIP performance. This success was achieved despite challenges that included a shortage of skilled trades professionals, higher interest rates, and supply chain disruptions early in the year. A combination of residential insulation and new construction projects and the completion of multi-year projects contributed to accomplishments in 2023. The Company continued to adapt its CIP programs to the circumstances and help its customers with their energy efficiency needs.

In 2023, CenterPoint Energy continued implementing its *2021-2023 Triennial Plan* while also developing and filing the *2024-2026 Energy Conservation and Optimization ("ECO") Triennial Plan*.⁶ The Company expanded access to its CIP programs and introduced new services.⁷ As a result, the Company achieved a record fifteen consecutive years of surpassing its energy savings goals. 2023 first-year energy savings were 2,009,051 dekatherms ("Dth"), representing 1.35 percent of CenterPoint Energy's average retail sales, or 5 percent above goal. To achieve these energy savings, 2023 CIP program expenditures were \$41,484,184 or 100 percent of the approved budget. Overall, the cost per Dth of first-year energy savings was \$20.65 as compared to the planned \$21.63, or 4.6 percent more cost-effective than planned. When lifetime savings are considered, the Company calculates the average per Dth program cost was \$1.61.

The Company exceeded its energy savings goals in the Residential and Commercial & Industrial ("C&I") Segments. The overall CIP portfolio, as well as the Residential and C&I Segments, was cost effective from the utility, societal, and participant perspectives. Several programs in the residential and commercial segments performed especially well. In the residential segment, the High-Efficiency Homes program achieved energy savings of 109,611 Dth, or 170 percent of goal. This was partially attributable to higher-than-expected participation and energy savings per project due to the implementation of increased rebates in 2021-2023 for achieving higher tiers of whole building energy savings. Additionally, the Home Insulation Rebates program achieved 192 percent of its energy savings goal.

In the C&I segment, the C&I Custom Rebates program exceeded its energy savings goal with energy savings reaching 223 percent of goal in 2023. This high performance was the result of two large multi-year projects reaching completion. Other non-prescriptive C&I programs also exceeded savings goals including the Industrial Process & Commercial Efficiency program and the C&I Audit Services program.

Minnesota statute requires gas utilities to spend the equivalent of at least 1.0 percent of gross operating revenue ("GOR") from its residential customers on conservation programs that directly

⁶ *In the Matter of CenterPoint Energy's 2024-2026 Natural Gas Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-23-95, Compliance Filing (Jan. 26, 2024)

⁷ *In the Matter of CenterPoint Energy's 2021-2023 CIP Modification Request*, Docket No. G-008/CIP-20-478, Deputy Commissioner Decision (Nov. 7, 2022)

serve the needs of low-income customers. In 2023, the Company spent \$6,394,366 on dedicated low-income CIP programs, or the equivalent of 1.06 percent of GOR from its residential customers. Total portfolio spending for the benefit of CenterPoint Energy's low-income customers was \$6,949,815 (or 16.75 percent of total CIP spending) and was equivalent to 1.15 percent of GOR from its residential customers.

In 2023, the Company surpassed the minimum spending requirement for conservation programs that directly serve low-income customers.⁸ Efforts to reach and garner participation from income-qualified customers included collaborating with community-based organizations and public assistance programs in addition to participation in community events. Through these efforts, the Company was able to provide information on how customers would be able to have the potential of reducing their energy burden through energy efficiency programs and payment assistance programs. While some of this achievement is related to increased project costs due to inflation, a more significant portion is related to program changes from the last couple years. In 2023, CenterPoint Energy prioritized the performance of dedicated low-income programs. This included the updated Low-Income Multi-Family Building Efficiency ("LI MFBE") program, the new dedicated low-income program for multi-family buildings. Higher LI MFBE incentives and increased pre-weatherization spending in Low-Income Weatherization, Low-Income Rental Efficiency, and Non-Profit Affordable Housing allowed more projects to be completed and contributed to a 17 percent increase in spend over 2022 for the benefit of low-income customers. Pre-weatherization measures helped remove healthy, safety, and structural barriers to completing energy efficiency projects.

CenterPoint Energy is proud of its 2023 CIP accomplishments. The Company continues to demonstrate its commitment to helping its customers achieve cost-effective energy savings, contribute to Minnesota's highly effective natural gas energy efficiency programs, and produce economic benefits.⁹ Looking ahead to the upcoming 2024-2026 triennial, CenterPoint Energy is eager to build upon its 2023 successes. As the Company begins rollout of its *2024-2026 ECO Triennial Plan*, it continues to innovate and adapt its CIP programs to meet its customers' needs. This includes the introduction of new energy efficiency measures, higher rebates to encourage adoption, and new programs to expand outreach to a diverse customer base.

⁸ Following the passage of the ECO Act of 2021, the statutory low-income minimum spending requirement increased from 0.4% of gross operating revenue from residential customers in 2021 to 1.0% of gross operating revenue from residential customers in 2022. For CenterPoint Energy, this meant that the statutory low-income minimum spending requirement increased from \$2,415,205 in 2021 to \$6,038,014 in 2022. For further context, in 2021 CenterPoint Energy spent \$4,854,801 on CIP programs for the direct benefit of low-income customers, or 0.8% of gross operating revenue from residential customers.

⁹ American Council for an Energy Efficient Economy. The 2022 State Energy Efficiency Scorecard, available at <https://www.aceee.org/research-report/u2206> (last visited April 10, 2024).

Minority and Women Business Enterprise Vendors

CenterPoint Energy supports efforts to promote diversity in the energy and energy efficiency workforces. The Company recognizes the economic importance of diverse suppliers such as minority-owned and women-owned business enterprises (“MWBE”)¹⁰ to the Company’s business, to the economies of the states where CenterPoint Energy operates, and to the communities the Company serves. To increase awareness of the importance of diversity and transparency about the businesses that support CenterPoint Energy’s Minnesota CIP, the Company provides the following information about the diversity of its CIP vendors.

Total 2023 Minnesota CIP Spend	\$41,484,184
Vendor Spend ¹¹	\$13,490,940
MWBE Vendor Spend	\$1,717,898
MWBE Spend as Percent of Vendor Spend¹²	12.7%

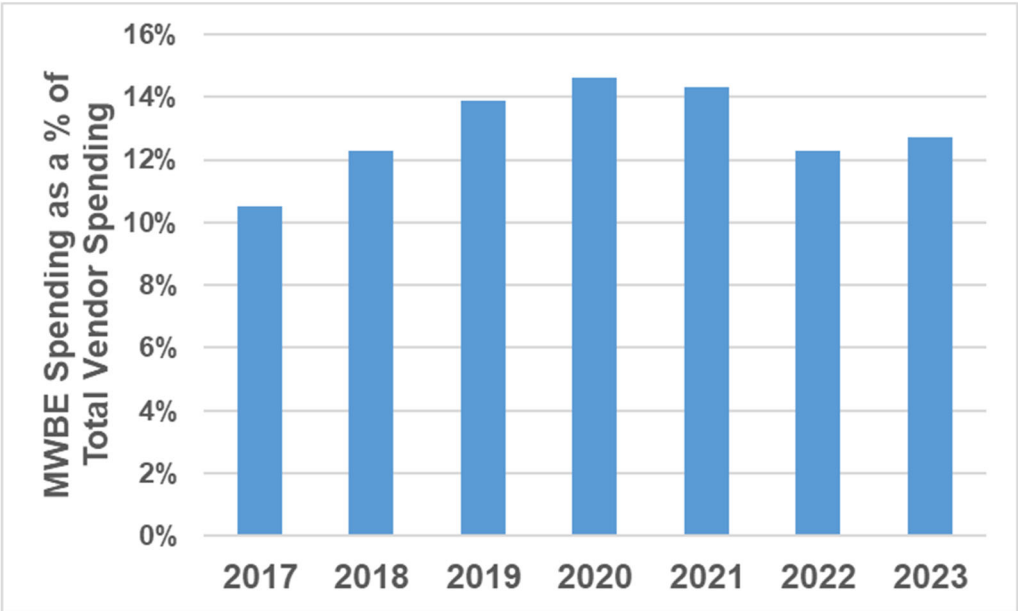
Between 2017 and 2023, MWBE spending increased from about 10 percent of total vendor spend to more than 12 percent, with a slight increase between 2022 and 2023. If non-profit entities are excluded from vendor spend in the calculation, vendor spend on MWBEs increased from 24 percent of the Company’s remaining vendor Minnesota CIP spend in 2022 to 25 percent in 2023. MWBE spending in 2023 was the second highest yearly dollar amount in 2017-2023 timeframe.

¹⁰ CenterPoint Energy defines minority-owned and women-owned business enterprises per the guidelines of the National Minority Supplier Development Council and the Women’s Business Enterprise National Council.

¹¹ The Company included in “vendor expenses” all CIP expenses made to business entities in return for services. Vendor spending includes, for example, payments to external project implementers and various marketing and advertisement firms CenterPoint Energy contracts with for energy efficiency promotions. Vendor spending does not include such things as customer or trade ally incentives, fees for membership in energy efficiency organizations (e.g., the Midwest Energy Efficiency Alliance), or various small expenses (e.g., business meals) that the Company does not track by vendor.

¹² The Company notes that \$6,705,134, or 49.7% percent of its vendor spend, went to non-profit entities; non-profit entities cannot qualify as MWBEs under the definition CenterPoint Energy uses.

2017-2023 Minority and Women Business Enterprise Minnesota CIP Spending



Update of Program Modifications

CenterPoint Energy provides the following information regarding the formal and informal modifications to *CenterPoint Energy's Approved 2023 Conservation Improvement Program ("CIP") Triennial Plan* that were made or approved in 2023 or had components that went into effect in 2023.¹³

Formal Modifications

Geographic-Based Eligibility for Low-Income Rental Efficiency

On November 1, 2021, the Deputy Commissioner approved CenterPoint Energy's September 1, 2021, request to allow geographic-based eligibility for Low-Income Rental Efficiency ("LIRE") program.¹⁴ Beginning in 2022, buildings occupied by low-income renters in the Minneapolis Green Zones automatically qualified for LIRE. In 2023, buildings that were both occupied by low-income renters and located in selected Areas of Concentrated Poverty by Census tract automatically qualified for LIRE.¹⁵ ¹⁶ New participation and energy savings goals and budget were approved for LIRE.

Pre-Weatherization Measures and Geographic-Based Eligibility for Low-Income Weatherization

On January 31, 2022, the Deputy Commissioner approved CenterPoint Energy's November 1, 2021, request to modify its CIP programs to comply with the new low-income minimum spending requirement from the Energy Conservation and Optimization Act of 2021 ("ECO").¹⁷ ¹⁸ The Company's plan to meet the new low-income minimum spending requirement in 2022 and 2023 included the following components:

- Adding budget for health, safety, and structural pre-weatherization measures in 2022 and 2023 to the Low-Income Weatherization ("LIW"), LIRE, and Non-Profit Affordable Housing ("NPAH") programs

¹³ The Deputy Commissioner requires utilities to include in their annual status reports a description of all program modifications and changes not requiring Deputy Commissioner approval in order to keep the Department and other interested parties informed of their activities. *In the Matter of CenterPoint Energy's 2020 Conservation Improvement Program Triennial Plan*, Docket No. G-008/CIP-20-479, *et al.*, Deputy Commissioner Decision, p. 54 (Nov. 25, 2020). In this section, CenterPoint Energy also describes any modifications requiring Deputy Commissioner approval.

¹⁴ *In the Matter of CenterPoint Energy's 2021-2023 CIP Modification Request*, Docket No. G-008/CIP-20-478, Deputy Commissioner Decision, pp. 3-6 (Nov. 1, 2021).

¹⁵ Areas of Concentrated Poverty by Census tract are defined as Census tracts where the overall poverty rate is greater than 40 percent.

¹⁶ Green Zones Initiative - City of Minneapolis
(minneapolismn.gov/government/departments/health/sustainability-homes-environment/sustainability/green-zones/)

¹⁷ Minn. Stat. § 216B.241, subd. 7a. Beginning January 1, 2022, a public utility furnishing gas service must spend at least one percent of its most recent three-year average gross operating revenue from residential customers in the state on low-income programs.

¹⁸ *In the Matter of CenterPoint Energy's 2021-2023 CIP Modification Request*, Docket No. G-008/CIP-20-478, Deputy Commissioner Decision, pp. 16-17 (Jan. 31, 2022).

- Updating customer eligibility requirements for the LIW program (i.e., allowing geographic-based eligibility), as well as increasing the program’s participation goals and budget
- Contributing \$100,000 per year to the state Healthy Asbestos Insulation Removal Account (“Healthy AIR Account”) in 2022 and 2023
- Incorporating low-income spending through hybrid commercial and industrial (“C&I”) programs for 2022-2023 into the plan¹⁹

The above-mentioned changes to CenterPoint Energy’s CIP programs took effect after receiving the Department’s approval, as the Company had proposed an implementation date of January 1, 2022.

Multi-Family Building Efficiency – New Dedicated Low-Income Program and Services

On November 7, 2022, the Deputy Commissioner approved CenterPoint Energy’s June 29, 2022, request to modify its Multi-Family Building Efficiency program (“MFBE”).²⁰ Modifications included replacing the Company’s Low-Income Multi-Family Housing Rebates program (“LIMF”) with the new Low-Income Multi-Family Building Efficiency program (“LI MFBE”), marketing and administering MFBE and LI MFBE as a single program, expanding the program to non-Xcel Energy customers, offering larger incentives to LI MFBE participants, adding new measures, and increasing the marketing budgets for both programs.

Market-rate projects are tracked and reported through MFBE, while income-eligible projects are tracked and reported through LI MFBE. LI MFBE offers larger bonus rebates of 200 percent of (or triple) prescriptive and custom rebate amounts. This is an increase over the previous 60 percent bonus rebates. Market-rate projects continue to receive 30 percent bonus rebates. New measures include commercial programmable thermostats, as well as weatherization rebates in LI MFBE. Weatherization rebate amounts are tied to the insulation’s R-value and location in the unit.

Proposed changes went into effect on January 1, 2023.

¹⁹ See definition and requirements for hybrid programs: In the Matter of CenterPoint energy’s 2021-2023 Natural Gas Conservation Improvement Program Triennial Plan, Docket No. G-008/CIP-20-478, Decision, pp. 10-11 (Nov. 25, 2020).

²⁰ *In the Matter of CenterPoint Energy’s 2021-2023 CIP Modification Request*, Docket No. G-008/CIP-20-478, Deputy Commissioner Decision, pp. 32-35 (Nov. 7, 2022).

Modifications Not Requiring Formal Approval

New Normal Program – Natural Gas Energy Analysis Visits and Bonus Rebates

On October 20, 2022, CenterPoint Energy submitted a Courtesy Notification to the Department describing an upcoming new C&I pilot service in partnership with the City of Minneapolis. This Clean Energy Partnership activity, named the “New Normal Program,” is an energy efficiency pathway for C&I customers (excluding multifamily) in Minneapolis that allows customers to earn bonus rebates. Customers that begin the pathway will receive a free Natural Gas Energy Analysis visit (co-pay covered by the city). If further actions are completed as part of this pathway, the customer will be eligible for bonus prescriptive rebates or triple standard rebates as a multiplier but not to exceed the cost of the measure. As a part of this activity, the Company is considering the potential expansion of the offering across the communities it serves.

Recruitment of participants began on November 1, 2022, with the pathway to bonus rebates available through all of 2023.

LIRE Pre-Weatherization Costs

On January 6, 2023, CenterPoint Energy submitted a Courtesy Notification to the Department of Commerce regarding the pre-weatherization contribution amount for LIRE program participants. The Company proposed covering the full costs of pre-weatherization measures for all LIRE participants, which could be done within the existing filed LIRE budget. Previously, LIRE participants had generally been expected to contribute 50 percent of the costs of pre-weatherization measures, with the exception of property owners who demonstrated financial hardship who received no-cost services.

Proposed changes were effective as of January 1, 2023.

Bonus Rebates

On March 3, 2023, CenterPoint Energy submitted a Courtesy Notification to the Department of Commerce regarding a limited time offer of bonus rebates and trade ally incentives.

The bonus rebate offer was for boiler tune-ups, steam traps, and industrial process equipment tune-ups. Specifically, the following bonus campaigns were offered to customers:

- Increase of customer rebate from 35 to 40 percent of costs for steam traps
- Increase of customer rebate from 25 to 35 percent for boiler tune-ups
- Increase of customer rebate from 25 to 35 percent of costs for process equipment tune-ups and industrial equipment tune-ups
- Doubling Trade Ally Incentive on boiler tune-ups from \$10/tune-up to \$20/tune-up
- Doubling Trade Ally Incentive on steam traps from \$5/trap to \$10/trap
- Increase of Trade Ally Incentive for industrial equipment tune-ups from \$100 to \$150

Rebate applications that were received from April 1, 2023, through July 1, 2023, were eligible for this promotion.

Foodservice Bonus Rebates

On April 3, 2023, CenterPoint Energy submitted a Courtesy Notification to the Department of Commerce regarding a limited time offer of bonus rebates and trade ally incentives for the Foodservice Rebates program.

With continued challenges in the foodservice industry regarding equipment price increases, CenterPoint Energy offered the following incentives:

- 20 percent bonus increase for Customer Rebates
- 50 percent bonus increase for Trade Ally Incentives

Rebate applications received from July 10, 2023, through October 30, 2023, were eligible for this promotion.

LIRE Income Guidelines

On June 27, 2023, CenterPoint Energy submitted a Courtesy Notification to the Department of Commerce proposing changes to the income guidelines of the Low-Income Rental Efficiency (“LIRE”) program.

The modification changed the LIRE income guidelines from 60 percent or less of state median income scaled for household size to the greater of 60 percent or less of state median income or 80 percent or less of area median income scaled for household size.

The new LIRE income guidelines were proposed because 80 percent or less of area median income was one of ECO’s newly amended low-income household definitions. CenterPoint Energy retained 60 percent or less of state median income as an alternative income limit because in some counties in the Company’s service territory, 80 percent of area median income was below 60 percent of state median income. Therefore, retaining 60 percent of state median income as an alternative income limit would ensure that the new income guidelines did not narrow LIRE eligibility in some counties.

Proposed changes were effective as of July 20, 2023.

NPAH Income Guidelines

On August 29, 2023, CenterPoint Energy submitted a Courtesy Notification to the Department of Commerce regarding a proposed change to the income guidelines for CenterPoint Energy’s NPAH program. Eligibility was proposed to be expanded to 80 percent of area median income, scaled for household size. This aligned the program with ECO’s newly amended low-income household definition. This expanded eligibility took effect immediately upon approval from the Department of Commerce.

Proposed changes were effective as of January 1, 2023.

Compliance Overview

During the 2021 program year, CenterPoint Energy identified an issue with the three-year average gross annual retail energy sales filed in the *2021-2023 Conservation Improvement Program (“CIP”) Triennial Plan (“Triennial Plan”)*.²¹ See the 2021 CIP Status Report for more details.

The table below summarizes the corrected average annual retail energy sales of 148,546,443 Dth used in the following sections.

Total Weather-Normalized Energy Sales (Dth)	2017	184,514,800
	2018	189,773,000
	2019	196,753,100
Sales to CIP-Exempt Customers (Dth)	2017	39,741,677
	2018	41,745,976
	2019	43,913,919
Net Weather-Normalized Energy Sales (Dth) (Total Sales Less Sales to Exempt Customers)	2017	144,773,124
	2018	148,027,024
	2019	152,839,181
Average Weather-Normalized Energy Sales		148,546,443

In the compliance sections below, the Company reports compliance with requirements in effect beginning January 1, 2023. The 92nd Minnesota Legislature (2021-2022) passed the Energy Conservation and Optimization (“ECO”) Act of 2021, which removed the minimum spending requirements for the Company’s Minnesota CIP and changed the Research and Development (“R&D”) spending cap.

Energy Savings Goals (Minn. Stat. § 216B.241, subd. 1c)

CenterPoint Energy’s approved 2023 energy savings goal represents 1.28 percent of the Company’s revised three-year average gross annual retail energy sales.²² The Company surpassed the approved 2023 energy savings goal by 100,809 Dth, achieving energy savings equivalent to 1.35 percent of CenterPoint Energy’s approved three-year-average weather-normalized energy sales excluding energy sales to CIP-exempt customers.

²¹ *In the Matter of CenterPoint Energy’s Approved 2021-2023 Conservation Improvement Program Triennial Plan*, Docket No. G-008/CIP-20-478, (Jan. 20, 2021).

²² See Minn. Stat. § 216B.241, subd. 1c(c).

Table 1. Compliance with Annual Energy Savings Goal

Average Weather-Normalized Energy Sales (2017-2019)	148,546,443 Dth
2023 Energy Savings Goal	1,908,242 Dth
2023 CIP Energy Savings Goal - Percent of Average Weather-Normalized Energy Sales	1.28%
2023 Actual Energy Savings	2,009,051 Dth
2023 CIP Energy Savings - Percent of Average Weather-Normalized Energy Sales	1.35%

Low-Income Spending Requirement (Minn. Stat. § 216B.241, subd. 7)

Minnesota Statutes § 216B.241, subd. 7, requires each gas utility to annually spend at least 1.0 percent of its most recent three-year-average residential GOR on conservation programs that directly serve the needs of low-income customers. In 2023, CenterPoint Energy spent a total of **\$6,949,815** on low-income customers participating in CIP, representing 1.15 percent of the Company’s three-year-average GOR from residential customers.²³

²³ Consistent with how CIP energy savings goals are calculated for Triennial Plan filings, the Company calculated its three-year average GOR from residential customers using the three most recent years prior to filing *CenterPoint Energy’s 2021-2023 Conservation Improvement Program Triennial Plan*. See CenterPoint Energy’s Approved 2021-2023 Conservation Improvement Program Triennial Plan, Docket No. G-008/CIP-20-478, pp. 7 (Jan. 20, 2021). The Company calculated applicable minimum low-income spending amounts using the methodology approved by the Deputy Commissioner in 2015. See *In the Matter of CenterPoint Energy’s Conservation Improvement Program 2013 Status Report*, Docket No. G-008/CIP-12-564.02, Deputy Commissioner Decision, Ordering Point 3 (Jan. 9, 2015).

Table 2. Compliance with Low-Income Spending Requirement

2017 GOR from Residential Customers	\$555,857,400
2018 GOR from Residential Customers	\$653,856,200
2019 GOR from Residential Customers	\$601,690,500
2017-2019 Average GOR from Residential Customers ²⁴	\$603,801,367
Statutory Spending Factor	1.0%
Statutory Minimum Low-Income Spending	\$6,038,014
2023 Spending (Dedicated Low-Income Segment) ²⁵	\$6,394,366
Spending as Percent of Residential GOR (Dedicated Low-Income Programs ONLY)	1.06%
2023 Low-Income Spending in the Energy Design Assistance (EDA) Program	\$252,501
2023 Low-Income Spending in the Home Energy Reports Program	\$302,948
2023 Total Low-Income Spending (Dedicated Low-Income Programs, EDA, and Home Energy Reports)	\$6,949,815
2023 Low-Income Spending as Percent of Residential GOR (Dedicated Low-Income Programs, EDA, and Home Energy Reports)	1.15%
Other 2023 Spending on Low-Income Customers in the Residential Market Segment	\$351,253

Pre-Weatherization Spending Cap (Minn. Stat. § 216B.241, subd. 7(f))

Minnesota Statutes § 216B.241, subd. 7(f) established that the maximum utilities may spend on pre-weatherization measures through CIP should be 15 percent of total CIP low-income spending. The table below shows CenterPoint Energy's compliance with this pre-weatherization spending cap.

Minn. Stat. §216B.241 subd. 7(h) permits utilities to contribute to the state's Healthy Asbestos Insulation Remediation Account, which funds pre-weatherization measures for low-income households. Utility contributions to the Healthy AIR Account count towards the CIP minimum low-income spending requirement and the pre-weatherization spending cap.

²⁴ Annual GOR from residential customers figures come from the Company's 2017-2019 Gas Jurisdictional Annual Reports, Page G-38 (Revenue Corresponding to Sales for Residential With Heating and Residential Without Heating).

²⁵ 2023 dedicated low-income segment spending includes a \$100,000 Healthy AIR Account Contribution.

Table 3. Compliance with Pre-Weatherization Spending Cap

2023 CIP Spending in Dedicated Low-Income Programs ²⁶	\$6,394,366
2023 Pre-Weatherization Spending Cap	\$959,155
2023 Pre-Weatherization Spending	\$482,324
2023 Pre-Weatherization Spending + 2023 Healthy AIR Account Spending	\$582,324
2023 Pre-Weatherization + 2023 Healthy AIR Account Spending as Percent of Low-Income Spending	9.1%

R&D Spending Cap (Minn. Stat. § 216B.241, subd. 2(e))

Minnesota Statutes § 216B.241, subd. 2(e) established that the maximum utilities may spend on R&D through CIP should be 10 percent of total CIP spending. The table below shows CenterPoint Energy’s compliance with this R&D spending cap. For descriptions of the Company’s 2023 R&D activities, see the description of the Analysis, Evaluation, & Project Development project included in the 2023 CIP Results section of this Status Report.

Table 4. Compliance with Research and Development Spending Cap

2023 Total CIP Spending	\$41,484,184
2023 R&D Spending Cap	\$4,148,418
2023 Total R&D Spending	\$251,471

Distributed and Renewable Generation Cap (Minn. Stat. § 216B.2411, subd. 1(a))

Minnesota Statutes § 216B.2411, subd. 1(a), allow utilities to spend up to five percent of their total CIP spending on distributed and renewable generation projects. CenterPoint Energy did not expend funds on any such projects in 2023.

Implementation of the Energy Conservation and Optimization Act In Support of the Inflation Reduction Act of 2022

In 2023, the Minnesota Public Utility Commission ordered, “The utilities shall maximize the benefits of the Inflation Reduction Act (“IRA”) in future resource acquisitions and requests for proposals in the planning phase, petitions for cost recovery through riders and rate cases, resource plans, gas resource plans, integrated distribution plans, and Natural Gas Innovation Act innovation plans. In such filings, utilities shall discuss how they plan to capture and maximize the benefits from the Act, and how the Act has impacted planning assumptions including (but not limited to) the predicted cost of assets and projects and the adoption rates of

²⁶ 2023 CIP low-income spending includes a \$100,000 Healthy AIR Account Contribution.

electric vehicles, distributed energy resources, and other electrification measures. Reporting shall continue until 2032.”²⁷

In 2023, CenterPoint Energy began to incorporate information about IRA incentives into marketing material and dedicated website pages. This includes thumbnails and links to ENERGY STAR® guidance on available IRA tax credits. The Company also began educating our participating HVAC contractor network on the IRA and encourage them to raise customer awareness about the funding opportunities for energy efficiency. To the extent that information was available, the Company has also taken account of future IRA incentives when it comes to designing energy efficiency programs for its *2024-2026 ECO Triennial Plan* to factor in potential participants to receive a rebate from the program alongside IRA tax credits. The Company’s energy efficiency programs are designed with the flexibility to align these programs to enable customers to maximize rebates and incentives to reduce the initial purchase price of high efficiency appliances.

CenterPoint Energy is considering reporting project level information on co-participation of utility programs and IRA rebate programs once the IRA rebate programs are running and the Company and the Department of Commerce can co-ordinate on participation.²⁸

²⁷ *In the Matter of a Joint Investigation into the Impacts of the Federal Inflation Reduction Act*, Docket No.E,G-999/CI-22-624, Ordering Point 1 (Sept. 12, 2023).

²⁸ CenterPoint Energy is still considering other possible options for collecting information on IRA program participation, but other options seem unlikely to produce usable information about participation in IRA programs. For example, requesting information on IRA tax credit participation through a rebate application was considered, but rejected because even if a trade ally were to supply this information about their customers, when a customer participates in our programs is not aligned with when the customer files their taxes and claims a tax credit.

2023 CIP Results²⁹

The information provided in the following tables satisfies the requirements of Minnesota Rules § 7690.0550.

2023 Program Summary

Summary	Budget	Participation	Energy Saved (Dth)	Demand Energy Saved (Dth)
Residential Market Segment				
2023 Goal	\$20,537,990	314,299	694,214	6,942
2023 Actual	\$21,725,395	301,944	706,374	7,064
Variance	\$1,187,405	(12,355)	12,160	122
Low-Income Market Segment				
2023 Goal	\$6,769,385	3,495	33,855	339
2023 Actual	\$6,394,366	2,418	27,369	274
Variance	(\$375,020)	(1,077)	(6,487)	(65)
C&I Market Segment				
2023 Goal	\$10,170,691	10,441	1,180,173	11,802
2023 Actual	\$10,022,197	8,939	1,275,308	12,753
Variance	(\$148,494)	(1,502)	95,135	951
Other Projects				
2023 Goal	\$3,803,298	700	0	0
2023 Actual	\$3,342,227	90	0	0
Variance	(\$461,072)	(610)	0	0
Total				
2023 Goal	\$41,281,365	328,935	1,908,242	19,082
2023 Actual	\$41,484,184	313,391	2,009,051	20,091
Variance	\$202,819	(15,544)	100,809	1,008

²⁹ Tables included in this section may not sum to the exact totals provided due to rounding.

2023 Budget Summary

Project	Budget	Actual Spending	Difference	Difference As a % of Budget
Residential Market Segment Projects				
Home Efficiency Rebates	\$9,705,202	\$9,803,521	\$98,318	1.0%
DIY Home Efficiency	\$712,396	\$193,378	(\$519,018)	-72.9%
Home Insulation Rebates	\$1,015,750	\$1,295,062	\$279,312	27.5%
Home Energy Reports	\$1,260,224	\$1,322,375	\$62,151	4.9%
Home Energy Squad	\$2,964,667	\$2,093,922	(\$870,745)	-29.4%
High-Efficiency Home	\$3,754,103	\$6,104,549	\$2,350,446	62.6%
New Home Construction Rebates	\$744,849	\$559,189	(\$185,660)	-24.9%
School Kits	\$380,799	\$353,400	(\$27,399)	-7.2%
Subtotal:	\$20,537,990	\$21,725,395	\$1,187,405	5.8%
Low-Income Market Segment Projects				
Low-Income Weatherization	\$4,160,339	\$4,488,541	\$328,202	7.9%
Low-Income Rental Efficiency	\$952,956	\$631,061	(\$321,895)	-33.8%
Low-Income Free Heating System Tune-Up	\$202,990	\$138,655	(\$64,335)	-31.7%
Non-Profit Affordable Housing Rebates	\$703,517	\$478,433	(\$225,084)	-32.0%
Low-Income Multi-Family Building Efficiency	\$649,583	\$557,676	(\$91,907)	-14.1%
Subtotal:	\$6,769,385	\$6,394,366	(\$375,020)	-5.5%
C&I Market Segment Projects				
Commercial Foodservice Equipment Rebates	\$711,424	\$676,014	(\$35,411)	-5.0%
C&I Heating and Water Heating Rebates	\$3,640,994	\$3,374,891	(\$266,103)	-7.3%
C&I Custom Rebates	\$2,009,243	\$1,658,931	(\$350,312)	-17.4%
C&I Audit Services	\$478,906	\$560,604	\$81,698	17.1%
Energy Design Assistance	\$1,433,895	\$1,469,548	\$35,653	2.5%
Code Compliance Support	\$115,929	\$64,888	(\$51,041)	-44.0%
Industrial Process & Commercial Efficiency	\$359,163	\$408,988	\$49,826	13.9%
C&I Training and Education	\$140,061	\$114,182	(\$25,878)	-18.5%
Benchmarking Services and Certification Assistance	\$183,530	\$166,515	(\$17,015)	-9.3%
Recommissioning Study and Rebates	\$148,611	\$181,908	\$33,297	22.4%
Multi-Family Building Efficiency	\$948,936	\$1,345,728	\$396,792	41.8%
Subtotal:	\$10,170,691	\$10,022,197	(\$148,494)	-1.5%
Other Projects				
Analysis, Evaluation, & Project Development	\$1,521,329	\$1,434,709	(\$86,620)	-5.7%
Energy Efficiency Marketing & Awareness	\$752,000	\$712,717	(\$39,283)	-5.2%
Planning & Regulatory Affairs	\$210,323	\$208,928	(\$1,395)	-0.7%
EZ Pay On-Bill Loan	\$518,930	\$185,157	(\$333,774)	-64.3%
MN ETA	\$800,716	\$800,716	\$0	0.0%
Subtotal:	\$3,803,298	\$3,342,227	(\$461,072)	-12.1%
Total	\$41,281,365	\$41,484,184	\$202,819	0.5%

2023 Energy Savings Summary

Project	Goal Energy Savings (Dth)	Actual Energy Savings (Dth)	Difference	Difference As a % of Goal	Lifetime Energy Savings (Dth)
Residential Market Segment Projects					
Home Efficiency Rebates	377,089	384,153	7,065	1.9%	7,291,082
DIY Home Efficiency	45,244	17,537	(27,707)	-61.2%	180,556
Home Insulation Rebates	23,604	45,247	21,643	91.7%	904,937
Home Energy Reports	112,845	99,110	(13,735)	-12.2%	297,331
Home Energy Squad	37,641	18,128	(19,513)	-51.8%	170,778
High-Efficiency Home	64,568	109,611	45,043	69.8%	2,192,211
New Home Construction Rebates	17,852	16,222	(1,630)	-9.1%	246,300
School Kits	15,371	16,365	994	6.5%	118,922
Subtotal:	694,214	706,374	12,160	1.8%	11,402,119
Low-Income Market Segment Projects					
Low-Income Weatherization	16,382	14,006	(2,376)	-14.5%	272,479
Low-Income Rental Efficiency	3,023	945	(2,078)	-68.7%	18,813
Low-Income Free Heating System Tune-Up	2,536	1,661	(875)	-34.5%	3,321
Non-Profit Affordable Housing Rebates	2,568	2,684	115	4.5%	50,236
Low-Income Multi-Family Building Efficiency	9,346	8,074	(1,272)	-13.6%	92,583
Subtotal:	33,855	27,369	(6,487)	-19.2%	437,432
C&I Market Segment Projects					
Commercial Foodservice Equipment Rebates	60,527	59,685	(842)	-1.4%	727,429
C&I Heating and Water Heating Rebates	744,581	588,681	(155,900)	-20.9%	3,755,752
C&I Custom Rebates	154,496	343,781	189,285	122.5%	5,281,390
C&I Audit Services	6,650	10,365	3,715	55.9%	85,949
Energy Design Assistance	150,651	131,484	(19,167)	-12.7%	2,629,680
Code Compliance Support	11,666	19,446	7,781	66.7%	388,922
Industrial Process & Commercial Efficiency	17,240	30,512	13,273	77.0%	242,105
C&I Training and Education	1,612	0	(1,612)	-100.0%	0
Benchmarking Services and Certification Assistance	0	0	N/A	N/A	N/A
Recommissioning Study and Rebates	12,500	13,359	859	6.9%	92,541
Multi-Family Building Efficiency	20,251	77,994	57,743	285.1%	690,602
Subtotal:	1,180,173	1,275,308	95,135	8.1%	13,894,370
Other Projects					
Analysis, Evaluation, & Project Development	0	0	0	N/A	N/A
Energy Efficiency Marketing & Awareness	0	0	0	N/A	N/A
Planning & Regulatory Affairs	0	0	0	N/A	N/A
EZ Pay On-Bill Loan	0	0	0	N/A	N/A
MN ETA	0	0	0	N/A	N/A
Subtotal:	0	0	0	N/A	N/A
Total	1,908,242	2,009,051	100,809	5.3%	25,733,921

2023 Demand Savings Summary

Project	Goal Demand Savings (Dth)	Actual Demand Savings (Dth)	Difference	Difference As a % of Goal
Residential Market Segment Projects				
Home Efficiency Rebates	3,771	3,842	71	1.9%
DIY Home Efficiency	452	175	(277)	-61.2%
Home Insulation Rebates	236	452	216	91.7%
Home Energy Reports	1,128	991	(137)	-12.2%
Home Energy Squad	376	181	(195)	-51.8%
High-Efficiency Home	646	1,096	450	69.8%
New Home Construction Rebates	179	162	(16)	-9.1%
School Kits	154	164	10	6.5%
Subtotal:	6,942	7,064	122	1.8%
Low-Income Market Segment Projects				
Low-Income Weatherization	164	140	(24)	-14.5%
Low-Income Rental Efficiency	30	9	(21)	-68.7%
Low-Income Free Heating System Tune-Up	25	17	(9)	-34.5%
Non-Profit Affordable Housing Rebates	26	27	1	4.5%
Low-Income Multi-Family Building Efficiency	93	81	(13)	-13.6%
Subtotal:	339	274	(65)	-19.2%
C&I Market Segment Projects				
Commercial Foodservice Equipment Rebates	605	597	(8)	-1.4%
C&I Heating and Water Heating Rebates	7,446	5,887	(1,559)	-20.9%
C&I Custom Rebates	1,545	3,438	1,893	122.5%
C&I Audit Services	67	104	37	55.9%
Energy Design Assistance	1,507	1,315	(192)	-12.7%
Code Compliance Support	117	194	78	66.7%
Industrial Process & Commercial Efficiency	172	305	133	77.0%
C&I Training and Education	16	0	(16)	-100.0%
Benchmarking Services and Certification Assistance	0	0	N/A	N/A
Recommissioning Study and Rebates	125	134	9	6.9%
Multi-Family Building Efficiency	203	780	577	285.1%
Subtotal:	11,802	12,753	951	8.1%
Other Projects				
Analysis, Evaluation, & Project Development	0	0	N/A	N/A
Energy Efficiency Marketing & Awareness	0	0	N/A	N/A
Planning & Regulatory Affairs	0	0	N/A	N/A
EZ Pay On-Bill Loan	0	0	N/A	N/A
MN ETA	0	0	N/A	N/A
Subtotal:	0	0	N/A	N/A
Total	19,082	20,091	1,008	5.3%

2023 Participation Summary

Project	Participation Goal	Actual Participation	Low-Income Participation Estimate	Actual Low-Income Participation
Residential Market Segment Projects				
Home Efficiency Rebates	29,710	29,483	475	482
DIY Home Efficiency	16,900	3,596	913	315
Home Insulation Rebates	1,665	2,231	20	14
Home Energy Reports	237,024	239,541	66,240	57,011
Home Energy Squad	7,500	4,321	435	193
High-Efficiency Home	2,500	4,186	5	14
New Home Construction Rebates	4,000	3,586	8	9
School Kits	15,000	15,000	0	0
Subtotal:	314,299	301,944	68,096	58,038
Low-Income Market Segment Projects				
Low-Income Weatherization	1,405	1,064	1,405	1,064
Low-Income Rental Efficiency	302	136	302	136
Low-Income Free Heating System Tune-Up	1,200	777	1,200	777
Non-Profit Affordable Housing Rebates	465	359	465	359
Low-Income Multi-Family Building Efficiency	123	82	123	82
Subtotal:	3,495	2,418	3,495	2,418
C&I Market Segment Projects				
Commercial Foodservice Equipment Rebates	500	315	0	0
C&I Heating and Water Heating Rebates	7,529	4,712	0	0
C&I Custom Rebates	43	183	0	0
C&I Audit Services	201	342	0	0
Energy Design Assistance	58	59	8	10
Code Compliance Support	77	19	0	0
Industrial Process & Commercial Efficiency	10	7	0	0
C&I Training and Education	1,020	987	0	0
Benchmarking Services and Certification Assistance	725	1,501	0	0
Recommissioning Study and Rebates	25	23	0	0
Multi-Family Building Efficiency	253	791	0	0
Subtotal:	10,441	8,939	8	10
Other Projects				
Analysis, Evaluation, & Project Development	0	0	0	0
Energy Efficiency Marketing & Awareness	0	0	0	0
Planning & Regulatory Affairs	0	0	0	0
EZ Pay On-Bill Loan	700	90	11	0
MN ETA	0	0	0	0
Subtotal:	700	90	11	0
Total	328,935	313,391	71,610	60,466

The methods used to determine low-income customer participation rates for applicable projects are described in the individual Market Segment summaries below.

2023 Low-Income Spending Summary

Project	Total Spending	Estimated Low-Income Spending	Low-Income Spending	Difference As a % of Estimated Spending
Residential Market Segment Projects				
Home Efficiency Rebates	\$9,803,521	\$0	\$210,964	N/A
DIY Home Efficiency	\$193,378	\$0	\$16,939	N/A
Home Insulation Rebates	\$1,295,062	\$0	\$7,676	N/A
Home Energy Reports	\$1,322,375	\$0	\$302,948	N/A
Home Energy Squad	\$2,093,922	\$0	\$93,526	N/A
High-Efficiency Home	\$6,104,549	\$0	\$20,301	N/A
New Home Construction Rebates	\$559,189	\$0	\$1,846	N/A
School Kits	\$353,400	\$0	\$0	N/A
Subtotal:	\$21,725,395	\$0	\$654,201	N/A
Low-Income Market Segment Projects				
Low-Income Weatherization	\$4,488,541	\$4,160,339	\$4,488,541	8%
Low-Income Rental Efficiency	\$631,061	\$952,956	\$631,061	-34%
Low-Income Free Heating System Tune-Up	\$138,655	\$202,990	\$138,655	-32%
Non-Profit Affordable Housing Rebates	\$478,433	\$703,517	\$478,433	-32%
Low-Income Multi-Family Building Efficiency	\$557,676	\$649,583	\$557,676	-14%
Subtotal:	\$6,394,366	\$6,669,385	\$6,394,366	-4%
C&I Market Segment Projects				
Commercial Foodservice Equipment Rebates	\$676,014	\$0	\$0	N/A
C&I Heating and Water Heating Rebates	\$3,374,891	\$0	\$0	N/A
C&I Custom Rebates	\$1,658,931	\$0	\$0	N/A
C&I Audit Services	\$560,604	\$0	\$0	N/A
Energy Design Assistance	\$1,469,548	\$196,444	\$252,501	29%
Code Compliance Support	\$64,888	\$0	\$0	N/A
Industrial Process & Commercial Efficiency	\$408,988	\$0	\$0	N/A
C&I Training and Education	\$114,182	\$0	\$0	N/A
Benchmarking Services and Certification Assistance	\$166,515	\$0	\$0	N/A
Recommissioning Study and Rebates	\$181,908	\$0	\$0	N/A
Multi-Family Building Efficiency	\$1,345,728	\$0	\$0	N/A
Subtotal:	\$10,022,197	\$196,444	\$252,501	29%
Other Projects				
Analysis, Evaluation, & Project Development	\$1,434,709	\$0	\$0	N/A
Energy Efficiency Marketing & Awareness	\$712,717	\$0	\$0	N/A
Planning & Regulatory Affairs	\$208,928	\$0	\$0	N/A
EZ Pay On-Bill Loan	\$185,157	\$0	\$0	N/A
MN ETA	\$800,716	\$0	\$0	N/A
Subtotal:	\$3,342,227	\$0	\$0	N/A
Total	\$41,484,184	\$6,865,829	\$7,301,068	6%

2023 Low-Income Energy Savings Summary

Project	Goal Energy Savings (Dth)	Actual Energy Savings (Dth)	Estimated Low-Income Energy Savings (Dth)	Actual Low-Income Energy Savings (Dth)
Residential Market Segment Projects				
Home Efficiency Rebates	377,089	384,153	6,411	7,065
DIY Home Efficiency	45,244	17,537	2,036	1,435
Home Insulation Rebates	23,604	45,247	71	254
Home Energy Reports	112,845	99,110	31,574	23,588
Home Energy Squad	37,641	18,128	3,764	957
High-Efficiency Home	64,568	109,611	0	292
New Home Construction Rebates	17,852	16,222	0	37
School Kits	15,371	16,365	0	0
Subtotal:	694,214	706,374	43,855	33,628
Low-Income Market Segment Projects				
Low-Income Weatherization	16,382	14,006	16,382	14,006
Low-Income Rental Efficiency	3,023	945	3,023	945
Low-Income Free Heating System Tune-Up	2,536	1,661	2,536	1,661
Non-Profit Affordable Housing Rebates	2,568	2,684	2,568	2,684
Low-Income Multi-Family Building Efficiency	9,346	8,074	9,346	8,074
Subtotal:	33,855	27,369	33,855	27,369
C&I Market Segment Projects				
Commercial Foodservice Equipment Rebates	60,527	59,685	0	0
C&I Heating and Water Heating Rebates	744,581	588,681	0	0
C&I Custom Rebates	154,496	343,781	0	0
C&I Audit Services	6,650	10,365	0	0
Energy Design Assistance	150,651	131,484	20,639	15,331
Code Compliance Support	11,666	19,446	0	0
Industrial Process & Commercial Efficiency	17,240	30,512	0	0
C&I Training and Education	1,612	0	0	0
Benchmarking Services and Certification Assistance	0	0	0	0
Recommissioning Study and Rebates	12,500	13,359	0	0
Multi-Family Building Efficiency	20,251	77,994	0	0
Subtotal:	1,180,173	1,275,308	20,639	15,331
Other Projects				
Analysis, Evaluation, & Project Development	0	0	0	0
Energy Efficiency Marketing & Awareness	0	0	0	0
Planning & Regulatory Affairs	0	0	0	0
EZ Pay On-Bill Loan	0	0	0	0
MN ETA	0	0	0	0
Subtotal:	0	0	0	0
Total	1,908,242	2,009,051	98,350	76,328

2023 Renter Participation Summary

Project	Participation Goal	Actual Participation	Renter Participation Estimate	Actual Renter Participation
Residential Market Segment Projects				
Home Efficiency Rebates	29,710	29,483	2,050	1,372
DIY Home Efficiency	16,900	3,596	2,366	234
Home Insulation Rebates	1,665	2,231	118	114
Home Energy Reports	237,024	239,541	8,770	14,648
Home Energy Squad	7,500	4,321	915	279
High-Efficiency Home	2,500	4,186	15	106
New Home Construction Rebates	4,000	3,586	96	147
School Kits	15,000	15,000	-	-
Subtotal:	314,299	301,944	14,330	16,900
Low-Income Market Segment Projects				
Low-Income Weatherization	1,405	1,064	141	40
Low-Income Rental Efficiency	302	136	302	52
Low-Income Free Heating System Tune-Up	1,200	777	26	132
Non-Profit Affordable Housing Rebates	465	359	23	44
Low-Income Multi-Family Building Efficiency	123	82	123	82
Subtotal:	3,495	2,418	615	350
C&I Market Segment Projects				
Commercial Foodservice Equipment Rebates	500	315	12	-
C&I Heating and Water Heating Rebates	7,529	4,712	873	-
C&I Custom Rebates	43	183	1	-
C&I Audit Services	201	342	4	-
Energy Design Assistance	58	59	33	57
Code Compliance Support	77	19	-	-
Industrial Process & Commercial Efficiency	10	7	-	-
C&I Training and Education	1,020	987	-	-
Benchmarking Services and Certification Assistance	725	1,501	10	-
Recommissioning Study and Rebates	25	23	-	-
Multi-Family Building Efficiency	253	791	253	791
Subtotal:	10,441	8,939	1,186	848
Other Projects				
Analysis, Evaluation, & Project Development	0	0	-	-
Energy Efficiency Marketing & Awareness	0	0	-	-
Planning & Regulatory Affairs	0	0	-	-
EZ Pay On-Bill Loan	700	90	-	2
MN ETA	0	0	-	-
Subtotal:	700	90	-	2
Total	328,935	313,391	16,131	18,100

The methods used to determine renter participation rates for applicable projects are described in the individual Market Segment summaries below.

2023 Cost-Benefit Analyses

Project	Ratepayer Impact Test	Utility Cost Test	Societal Test	Participant Test
Residential Market Segment Projects				
Home Efficiency Rebates	0.60	3.59	2.72	3.48
DIY Home Efficiency	0.63	4.93	7.67	N/A
Home Insulation Rebates	0.59	3.36	1.37	1.69
Home Energy Reports	0.44	1.15	1.65	N/A
Home Energy Squad	0.27	0.43	0.60	7.00
High-Efficiency Home	0.51	1.72	2.35	3.73
New Home Construction Rebates	0.54	2.26	1.98	2.84
School Kits	0.52	1.85	2.81	N/A
Subtotal:	0.57	2.66	2.31	3.34
Low-Income Market Segment Projects				
Low-Income Weatherization	0.21	0.30	0.50	N/A
Low-Income Rental Efficiency	0.12	0.14	0.20	1.27
Low-Income Free Heating System Tune-Up	0.10	0.12	0.18	N/A
Non-Profit Affordable Housing Rebates	0.30	0.51	1.01	2.37
Low-Income Multi-Family Building Efficiency	0.39	0.86	0.95	2.11
Subtotal:	0.24	0.35	0.52	4.37
C&I Market Segment Projects				
Commercial Foodservice Equipment Rebates	0.62	5.64	3.55	4.16
C&I Heating and Water Heating Rebates	0.66	6.12	4.98	6.60
C&I Custom Rebates	0.84	16.13	7.90	7.19
C&I Audit Services	0.41	0.83	1.00	3.47
Energy Design Assistance	0.64	8.59	1.75	1.69
Commercial Code Compliance Support	28.78	28.78	48.29	N/A
Industrial Process & Commercial Efficiency	0.64	2.98	2.66	4.22
C&I Training and Education	N/A	N/A	N/A	N/A
Benchmarking Services and Certification Assistance	N/A	N/A	N/A	N/A
Recommissioning Study and Rebates	0.59	2.58	1.76	2.43
Multi-Family Building Efficiency	0.56	2.60	1.92	2.75
Subtotal:	0.66	6.92	3.53	4.53
Other Projects				
Analysis, Evaluation, & Project Development	N/A	N/A	N/A	N/A
Energy Efficiency Marketing & Awareness	N/A	N/A	N/A	N/A
Planning & Regulatory Affairs	N/A	N/A	N/A	N/A
EZ Pay On-Bill Loan	N/A	N/A	N/A	N/A
MN ETA	N/A	N/A	N/A	N/A
Subtotal:	N/A	N/A	N/A	N/A
Total	0.58	3.15	2.56	3.93

2023 Cost per Dth Saved Comparison

Project	Approved Cost per Dth Saved	Actual Cost per Dth Saved	Difference As a % of Approved Cost per Dth
Residential Market Segment Projects			
Home Efficiency Rebates	\$25.74	\$25.52	-0.8%
DIY Home Efficiency	\$15.75	\$11.03	-30.0%
Home Insulation Rebates	\$43.03	\$28.62	-33.5%
Home Energy Reports	\$11.17	\$13.34	19.5%
Home Energy Squad	\$78.76	\$115.51	46.7%
High-Efficiency Home	\$58.14	\$55.69	-4.2%
New Home Construction Rebates	\$41.72	\$34.47	-17.4%
School Kits	\$24.77	\$21.59	-12.8%
Subtotal:	\$29.58	\$30.76	4.0%
Low-Income Market Segment Projects			
Low-Income Weatherization	\$253.95	\$320.47	26.2%
Low-Income Rental Efficiency	\$315.22	\$667.95	111.9%
Low-Income Free Heating System Tune-Up	\$80.06	\$83.50	4.3%
Non-Profit Affordable Housing Rebates	\$273.91	\$178.28	-34.9%
Low-Income Multi-Family Building Efficiency	\$69.51	\$69.07	-0.6%
Subtotal:	\$199.95	\$233.64	16.8%
C&I Market Segment Projects			
Commercial Foodservice Equipment Rebates	\$11.75	\$11.33	-3.6%
C&I Heating and Water Heating Rebates	\$4.89	\$5.73	17.2%
C&I Custom Rebates	\$13.01	\$4.83	-62.9%
C&I Audit Services	\$72.01	\$54.09	-24.9%
Energy Design Assistance	\$9.52	\$11.18	17.4%
Code Compliance Support	\$9.94	\$3.34	-66.4%
Industrial Process & Commercial Efficiency	\$20.83	\$13.40	-35.7%
C&I Training and Education	\$86.89	N/A	N/A
Benchmarking Services and Certification Assistance	N/A	N/A	N/A
Recommissioning Study and Rebates	\$11.89	\$13.62	14.5%
Multi-Family Building Efficiency	\$46.86	\$17.25	-63.2%
Subtotal:	\$8.62	\$7.86	-8.8%
Other Projects			
Analysis, Evaluation, & Project Development	N/A	N/A	N/A
Energy Efficiency Marketing & Awareness	N/A	N/A	N/A
Planning & Regulatory Affairs	N/A	N/A	N/A
EZ Pay On-Bill Loan	N/A	N/A	N/A
MN ETA	N/A	N/A	N/A
Subtotal:	N/A	N/A	N/A
Total	\$21.63	\$20.65	-4.6%

2023 LIHEAP and GAP Participation Summary

Project	Participation Goal	Actual Participation	LIHEAP Participants	GAP Participants
Residential Market Segment Projects				
Home Efficiency Rebates	29,710	29,483	482	122
DIY Home Efficiency	16,900	3,596	315	124
Home Insulation Rebates	1,665	2,231	14	4
Home Energy Reports	237,024	239,541	57,011	2,843
Home Energy Squad	7,500	4,321	193	59
High-Efficiency Home	2,500	4,186	14	1
New Home Construction Rebates	4,000	3,586	9	-
School Kits	15,000	15,000	-	-
Subtotal:	314,299	301,944	58,038	3,153
Low-Income Market Segment Projects				
Low-Income Weatherization	1,405	1,064	1,064	215
Low-Income Rental Efficiency	302	136	136	4
Low-Income Free Heating System Tune-Up	1,200	777	777	247
Non-Profit Affordable Housing Rebates	465	359	-	-
Low-Income Multi-Family Building Efficiency	123	82	-	-
Subtotal:	3,495	2,418	1,977	466
C&I Market Segment Projects				
Commercial Foodservice Equipment Rebates	500	315	-	-
C&I Heating and Water Heating Rebates	7,529	4,712	-	-
C&I Custom Rebates	43	183	-	-
C&I Audit Services	201	342	-	-
Energy Design Assistance	58	59	-	-
Code Compliance Support	77	19	-	-
Industrial Process & Commercial Efficiency	10	7	-	-
C&I Training and Education	1,020	987	-	-
Benchmarking Services and Certification Assistance	725	1,501	-	-
Recommissioning Study and Rebates	25	23	-	-
Multi-Family Building Efficiency	253	791	-	-
Subtotal:	10,441	8,939	0	0
Other Projects				
Analysis, Evaluation, & Project Development	0	0	-	-
Energy Efficiency Marketing & Awareness	0	0	-	-
Planning & Regulatory Affairs	0	0	-	-
EZ Pay On-Bill Loan	700	90	0	0
MN ETA	0	0	-	-
Subtotal:	700	90	0	0
Total	328,935	313,391	60,015	3,619

On November 5, 2020, the Minnesota Public Utilities Commission ordered CenterPoint Energy to provide the following in the CIP annual status reports: “CenterPoint shall provide the number of LIHEAP [Low-Income Home Energy Assistance Program] and GAP [Gas Affordability Program] customers that participate in CenterPoint’s CIP programs.”³⁰ This information is reported in the table above. The figures above regarding LIHEAP and GAP participation were established through a cross-check between the Company’s CIP participation,³¹ LIHEAP, and GAP participation records.

For the 2023 CIP program year, a LIHEAP participant is defined as a customer who has received LIHEAP funding for the 2022-2023 or 2023-2024 winter seasons. LIHEAP in Minnesota is funded per winter season, so to cover a CIP year, both winter seasons are needed.

GAP is offered by CenterPoint Energy and is available to residential customers who receive LIHEAP assistance, agree to be placed on a levelized payment plan, and qualify for an affordability and/or arrearage forgiveness levelized credit under the terms of the Program.³² For the 2023 CIP program year, a GAP participant is defined as a GAP participant in the program at the end of the federal fiscal year.³³

³⁰ *In the Matter of the Application of CenterPoint Energy Resources Corp. for Approval of its 2019 Gas Affordability Program Report* Docket No. G-008/M-20-399, Ordering Point 7 (Nov. 5, 2020).

³¹ CIP cross-checks used the same definition of participant as is used in each individual program. The Company does not have information on customers to cross-check for LIHEAP/GAP in the School Kits Program or Non-Profit Affordable Housing Rebates programs. Similarly, the Company is also unable to cross-check for LIHEAP/GAP in the C&I Customer Segment, including Low-Income Multi-Family Housing Rebates.

³² *In the Matter of the Application by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G-008/GR-23-173, Compliance Filing, p. 25-25.b (Jan. 2, 2024).

³³ In the 2023 CIP program year, the federal fiscal year ended on September 30, 2023.

Residential Market Segment Programs

CenterPoint Energy’s Residential Market Segment achieved 96% of the Segment’s participation goal and 102% of the energy savings goal while spending was 106% of budget.

CenterPoint Energy submits 2023 year-end information on the following residential programs:

- Home Efficiency Rebates;
- DIY Home Efficiency;
- Home Insulation Rebates;
- Home Energy Reports;
- Home Energy Squad;
- High-Efficiency Home;
- New Home Construction Rebates; and
- School Kits.

Residential Market Segment	Program Spending	Program Participation	Energy Savings (Dth)	\$/Dth	BenCost Results (Societal Test)
Home Efficiency Rebates	\$9,803,521	29,483	384,153	\$25.52	2.72
DIY Home Efficiency	\$193,378	3,596	17,537	\$11.03	7.67
Home Insulation Rebates	\$1,295,062	2,231	45,247	\$28.62	1.37
Home Energy Reports	\$1,322,375	239,541	99,110	\$13.34	1.65
Home Energy Squad	\$2,093,922	4,321	18,128	\$115.51	0.60
High-Efficiency Home	\$6,104,549	4,186	109,611	\$55.69	2.35
New Home Construction Rebates	\$559,189	3,586	16,222	\$34.47	1.98
School Kits	\$353,400	15,000	16,365	\$21.59	2.81
Residential Total	\$21,725,395	301,944	706,374	\$30.76	2.31

Detailed descriptions of Residential Market Segment programs can be found in *CenterPoint Energy’s 2021-2023 Conservation Improvement Program Triennial Plan*.³⁴

Method Used to Determine Achievement of Low-Income and Renter Goals for the Residential Market Segment

The figures regarding low-income participation were established through a cross-check between CenterPoint Energy’s CIP participation and Low-Income Home Energy Assistance Program (“LIHEAP”) recipient records. Renter participation was established through a cross-check of rental data in CenterPoint Energy’s customer information system.

³⁴ *CenterPoint Energy’s Approved 2021-2023 Conservation Improvement Program Triennial Plan*, Docket No. G-008/CIP-20-478, (Jan. 20, 2021).

For the hybrid Home Energy Reports program, the program vendor collected third-party customer data (on customers with annual incomes of \$40,000 or less) and Census tract data (on customers with annual incomes of \$46,080 or less) to identify customers who were eligible for the program’s specialized services for low-income customers.

Home Efficiency Rebates

The program achieved 99% of its participation goal and 102% of its energy savings goal while program spending was 101% of budget.

The following table shows the quantities of each type of measure rebated through the program:

Home Efficiency Rebates: Quantity of Measures Rebated

Measure Type	Quantity Rebated
Heating System Equipment	16,638
Water Heaters	3,062
Thermostats	8,446
ENERGY STAR® Laundry Equipment	348
Hearth with Electronic Ignition	989
Total	29,483

DIY Home Efficiency

The program achieved 21% of its participation goal and 39% of its energy savings goal while program spending was 27% of budget.

CenterPoint Energy believes this program might have reached market saturation after several years of high participation followed by waning participation and a static delivery model. In the 2024-2026 triennial period, the Company is taking steps to reinvigorate the DIY program, including transitioning to a new vendor and online platform. After this transition has completed, CenterPoint Energy will be actively promoting the program through expanded event outreach and community engagement, which will drive onsite conversions and create more opportunities for customers to participate in the DIY program and receive energy saving products.

Home Insulation Rebates

The program achieved 134% of its participation goal and 192% of its energy savings goal while program spending was 127% of budget.³⁵

The following table shows the quantities of each type of measure rebated through the program:

Home Insulation Rebates: Quantity of Measures Rebated

Measure Type	Quantity Rebated
Wall Insulation	276
Attic Sealing (alone)	12
Attic Insulation + Air Sealing	1,810
Sill Plate/Rim Joist	133
Total	2,231

Home Energy Reports

The program achieved 101% of its participation goal and 88% of its energy savings goal while program spending was 105% of budget.

In alignment with hybrid low-income/market rate program requirements, the following table shows low-income participation, energy savings, and rebates through the program relative to the *2021-2023 CIP Triennial Plan*.

Home Energy Reports: Low-Income Metrics

Low-Income Metric	Goal	Actual
Participation	66,240	57,011
Energy Savings (Dth)	31,574	23,588
Total Spending (\$)	\$251,005	\$302,948

³⁵ In *CenterPoint Energy's 2021-2023 CIP Triennial Plan*, the Company stated that it would calculate energy savings for conservation measures consistent with the State of Minnesota Technical Reference Manual for Energy Conservation Improvement Programs ("TRM") version 3.1. See CenterPoint Energy's Approved 2021-2023 CIP Triennial Plan, Docket No. G-008/CIP-20-478, p. A-5. However, in 2022 the Company deviated slightly from the TRM method when determining the 2021 energy savings for attic sealing measures. For attic sealing, the TRM includes a factor for converting leakage at 50 pascals to leakage at natural conditions. TRM, Version 3.1, Docket No. E,G-999/CIP-15-896, pp. 427-429, (Jan. 14, 2016). The information for determining this factor was not submitted for some rebates in 2022. As discussed with the Department in 2017, the Company assumed an average conversion factor for these rebates based on 2022 rebates for which the Company had complete information on the rebated homes.

In CenterPoint Energy’s 2022 CIP Status Report, Home Energy Reports market-rate participation was mistakenly undercounted while low-income participation was overcounted.³⁶ The table below shows the corrections. The corrections have not affected 2023 spending and energy savings.

Home Energy Reports: Corrected 2022 Participation Counts

	2022 Status Report	Corrected
Market-Rate	188,394	192,892
Low-Income	64,473	59,976
Total	252,867	252,868

Home Energy Squad

The program achieved 58% of its participation goal and 48% of its energy savings goal while program spending was 71% of budget.

There were 4,321 unique customer accounts served through squad visits, 699 of which were provided to self-identified low-income customers for no fee. In 2023, some municipalities chose to encourage participation in the Home Energy Squad program by paying a portion of program fees for their residents. In total, local governments and neighborhood associations reduced customers’ fees by providing \$138,400 in funding.

Participation in 2023 did not meet goal, partially due to challenges with hiring and retaining HES staff. The Company took these outcomes into account in *2024-2026 ECO Triennial Planning*. CenterPoint Energy also proactively took steps to get closer to achieving HES goals in 2023, including sponsorship of workforce training for the implementer (outside CIP), planning additional promotional and marketing support to drive program sign-ups during slower summer months, and planning increased outreach to community partners. Looking ahead, the Company is adding a second HES vendor in 2024 in an effort to provide additional HES visits to outstate customers and ensure that increased demand for HES can be accommodated in the future.

High-Efficiency Home

The program achieved 167% of its participation goal and 170% of its energy savings goal while program spending was 163% of budget.

³⁶ *In the Matter of CenterPoint Energy’s 2022 Gas Energy Conservation and Optimization Status Report*, Docket No. G-008/CIP-20-478, p. 21 (May 1, 2023).

HEH benefits from effective marketing and strong relationships cultivated among participating home builders and home raters. In 2023, program performance was notably affected by conditions in the existing homes market, high interest rates in particular. Relatively high interest rates lead many existing homeowners to decide not to sell and thereby give up a low-rate existing mortgage for a different home with a higher rate new mortgage. With few existing homes on the market demand shifted toward new homes, fueling new construction and participation in HEH.

The following table shows how many participating homes achieved the energy savings required for each rebate tier.

High-Efficiency Home: Quantity of Participating Homes by Rebate Tier

Percent Gas Savings Above Code	Quantity of Homes Achieving
10-14%	536
15-19%	1,291
20-24%	1,568
25-29%	656
30-34%	123
35-39%	9
40% gas savings and above	3
Total	4,186

In 2023, no Passive House certification incentives were paid through the High-Efficiency Home program.

New Home Construction Rebates

The program achieved 90% of its participation goal and 91% of its energy savings goal, while program spending was 75% of budget.

The following table shows the quantities of each type of measure rebated through the program:

New Home Construction Rebates: Quantity of Measures Rebated

Measure Type	Quantity Rebated
Heating System Equipment	822
Water Heaters	125
Thermostats	697
ENERGY STAR® Laundry Equipment	29
Hearth with Electronic Ignition	1,913
Total	3,586

School Kits

The program achieved 100% of its participation goal and 106% of its energy savings goal, while program spending was 93% of budget.

The School Kits program continues to see strong interest, with local schools providing positive feedback for using the conservation program as an educational opportunity. The estimates used for quantifying savings are from survey responses (see the table below), and the differences between those responses in 2023 as compared to the *2021-2023 CIP Triennial Plan* account for the different energy savings rates.

In 2023, the Company collected information on the installation rates for participants in the School Kits program. This information was used to calculate energy savings per measure shown in the table below.

School Kits: Measure Energy Savings

Measure Type	Base Energy Savings/ Measure	Installation Rates	% Gas Water Heaters	Savings/ Measure
Low-flow (1.5 GPM) showerhead	1.76	47.7%	56.7%	0.48
Low-flow (1.5 GPM) kitchen faucet aerator	0.56	38.9%	56.7%	0.12
Low-flow (0.5 GPM) bathroom faucet aerator	0.49	42.7%	56.7%	0.12
Water Heater Setback	0.86	76.7%	56.7%	0.37

Low-Income Market Segment Programs

CenterPoint Energy's Low-Income Market Segment achieved 69% of the Segment's participation goal and 81% of the energy savings goal, while spending was 94% of budget.

CenterPoint Energy's spending on the Low-Income Market Segment programs represents 1.06% percent of the Company's three-year average GOR from residential customers.³⁷ As summarized in Table 2 of the Compliance Overview section of this Status Report, when low-income CIP spending for Home Energy Reports and Energy Design Assistance are included, the Company spent just under 1.15% percent of its three-year average GOR from residential customers to directly serve low-income customers.

CenterPoint Energy submits 2023 year-end information on the following dedicated low-income programs:

- Low-Income Weatherization;
- Low-Income Rental Efficiency;
- Low-Income Free Heating System Tune-Up;
- Non-Profit Affordable Housing Rebates; and
- Low-Income Multi-Family Building Efficiency.

Low-Income Market Segment	Program Spending	Program Participation	Energy Savings (Dth)	\$/Dth	BenCost Results (Societal Test)
Low-Income Weatherization	\$4,488,541	1,064	14,006	\$320.47	0.50
Low-Income Rental Efficiency	\$631,061	136	945	\$667.95	0.20
Low-Income Free Heating System Tune-Up	\$138,655	777	1,661	\$83.50	0.18
Non-Profit Affordable Housing Rebates	\$478,433	359	2,684	\$178.28	1.01
Low-Income Multi-Family Building Efficiency	\$557,676	82	8,074	\$69.07	0.95
Low-Income Total³⁸	\$6,394,366	2,418	27,369	\$233.64	0.52

³⁷ Consistent with how CIP energy savings goals are calculated for Triennial Plan filings, the Company calculated its three-year average GOR from residential customers using the three most recent years prior to filing *CenterPoint Energy's 2021-2023 Conservation Improvement Program Triennial Plan*. See CenterPoint Energy's Approved 2021-2023 Conservation Improvement Program Triennial Plan, Docket No. G-008/CIP-20-478, p. 7 (Jan. 20, 2021). The Company calculated applicable minimum low-income spending amounts using the methodology approved by the Deputy Commissioner in 2015. See *In the Matter of CenterPoint Energy's Conservation Improvement Program 2013 Status Report*, Docket No. G-008/CIP-12-564.02, Deputy Commissioner Decision, Ordering Point 3 (Jan. 9, 2015).

³⁸ Includes a \$100,000 contribution to the DOC's Healthy AIR Account.

Detailed descriptions of Low-income Market Segment programs can be found in *CenterPoint Energy's Approved 2021-2023 Conservation Improvement Program Triennial Plan*.³⁹

Method Used to Determine Achievement of Low-Income and Renter Goals for the Low-Income Market Segment

Low-income status of residential customer participants in the Low-Income Market Segment was verified by third party agencies such as Community Action, program vendors, and non-profit affordable housing agencies.⁴⁰ Low-income multi-family housing owners provided documentation to CenterPoint Energy showing pre-qualification for the Department of Energy Weatherization Assistance Program (“WAP”), certification for Minnesota Low-Income Rental Classification (“LIRC”), or other documentation including (but not limited to) participation in the project-based Section 8 voucher program. Renter participation was established either through a cross-check of rental data in CenterPoint Energy’s customer information system or, when available, through third-party agency verification systems.

Additionally, low-income renters in the Minneapolis Green Zones could automatically qualify for services through LIW, owners of 1-4 unit buildings occupied by low-income renters in the Minneapolis Green Zones could automatically qualify for services through LIRE, and owners of 5+ unit buildings in select high poverty areas (i.e., Qualified Census Tracts and Census Tracts exhibiting a high degree of social vulnerability) could automatically qualify for LI MFBE. These alternative eligibility methods took effect in 2022 after the Company received the Department’s approval to expand eligibility for LIW and LIRE, and after the Department issued new CIP low-income program guidance for 5+ unit multi-family buildings that allowed for geographic-based eligibility. Expanding eligibility helped remove barriers to participating in LIW, LIRE, and LI MFBE while still ensuring that the programs served customers most in-need.

Low-Income Weatherization

The program achieved 76% of its participation goal and 85% of its energy savings goal while program spending was 108% of budget. 0 LIW customers, or 0% of total LIW customers, lived in the Minneapolis Green Zones and self-identified as low-income, thereby automatically qualifying for LIW.^{41 42}

³⁹ *CenterPoint Energy's Approved 2021-2023 Conservation Improvement Program Triennial Plan*. Docket No. G-008/CIP-20-478, (Jan. 25, 2021).

⁴⁰ In 2023, CenterPoint Energy added categorical eligibility for LIRE for customers participating in the Supplemental Nutrition Assistance Program and Women, Infants, and Childrens program. No customers utilized this eligibility method, which likely can be attributed to personnel and leadership changes at the organization implementing LIRE and the resulting impacts on program operations.

⁴¹ *In the Matter of CenterPoint Energy's 2021-2023 Conservation Improvement Program Modification Request Filed November 1, 2021*. Docket No. G-008/CIP-20-478, DOC Decision, (Jan. 31, 2022).

⁴² LIW standalone projects for renters rarely happen. For this reason, it was not unexpected that no customers qualified for LIW standalone projects with geographic-based eligibility.

The implementer reported that program results in 2023 were affected by a shortage of contractors. However, pre-weatherization was effective in removing participation barriers and moving more energy savings measures and projects toward completion.

Additionally, from December 2022 to January 2023, CenterPoint Energy conducted an LIW marketing campaign whereby LIW marketing materials and carbon monoxide detectors were mailed to 1,500 customers. The carbon monoxide detectors were at no-cost to customers. Approximately 1,000 of these customers 1) lived in the Minneapolis Green Zones, 2) were LIHEAP recipients in the 2021-2022 LIHEAP season and/or claimed low-income status between October 1, 2021, and April 30, 2022, to receive Cold Weather Rule protections, and 3) had not participated in LIW in the prior 15 years. The remaining approximately 500 customers were LIHEAP recipients in the 2020-2021 LIHEAP season and lived near the Minneapolis Green Zones. 5 customers targeted by this campaign subsequently participated in LIW in 2023.

The following table shows the quantity and average cost of measures installed through the program:

Low-Income Weatherization: Quantity and Average Cost of Measures

Measure Type ⁴³	Quantity	Average Cost of Measure
Weatherization	359	\$6,062
Furnaces	154	\$5,131
Boilers	25	\$9,842
Combi Units	1	\$14,512
Thermostats	93	N/A
Water Heaters	109	\$3,564
Furnace or Boiler Tune-Ups/Repairs	56	\$872
Pipe/Water Heater Insulation	219	N/A
Pre-Weatherization	48	\$5,627
Total	1,064	\$3,698

The following table shows the quantity of pre-weatherization measures by measure type:

⁴³ In the Low-Income Weatherization program, thermostats are typically installed in conjunction with other measures such as furnaces and boilers, and pipe/water heater insulation is reported in conjunction with weatherization. CenterPoint Energy does not track the cost of thermostats, pipe wrap, and water heater insulation separately, but their costs are included as part of the cost of the larger measures with which they are installed.

Low-Income Weatherization: Pre-Weatherization Measures

Measure Type	Measure Count
CO Smoke Detectors	2
Sewer Plumbing	1
Electrical/Knob and Tube Wiring	5
Asbestos Remediation	22
Vermiculite Remediation	9
Building, Structural, or Crawl Space Repair or Replacement	5
Hoarding Clean-Up or Pest Control	4
Total	48

Low-Income Rental Efficiency

The program achieved 45% of its participation goal and 31% of its energy savings goal while program spending was 66% of budget. 4 LIRE buildings, or 8% of total LIRE buildings, were located in the Minneapolis Green Zones and self-identified as low-income, thereby automatically qualifying for LIRE.⁴⁴

LIRE’s 2023 performance was affected by personnel and leadership changes at the LIRE implementer. The implementer also attributed LIRE’s performance to higher project costs and building owners lacking the money to pay for energy efficiency improvements. In 2024, LIRE is transitioning to a new implementer and expanding eligibility to serve more customers.

The following tables show certain key program statistics, the quantity and total cost of measures installed, the quantity of pre-weatherization measures by measure type, and the number of units in participating buildings in the program:

Low-Income Rental Efficiency: Key Program Statistics

Number of Properties	Total Dth Savings	Total Property Manager Contribution	Total Cost ⁴⁵	Property Manager Contribution %
52	945	\$124,299	\$472,623	26%

⁴⁴ *In the Matter of CenterPoint Energy’s 2021-2023 Conservation Improvement Program Modification Request Filed September 1, 2021.* Docket No. G-008/CIP-20-478, DOC Decision, (Nov. 1, 2021).

⁴⁵ Includes only the cost of the measures installed. Does not include the cost of the audit.

Low-Income Rental Efficiency: Quantity and Total Cost of Measures Installed

Type of Measure	Quantity	Total Cost
Weatherization Jobs	25	\$50,974
Furnaces	13	\$59,785
Boilers	18	\$144,180
Combi Units	0	\$0
Thermostats*	1	\$750
Water Heaters	7	\$22,800
Furnace or Boiler Tune-Ups/Repairs	0	\$0
Pre-Weatherization	72	\$194,134
Total	136	\$472,623

Low-Income Rental Efficiency: Pre-Weatherization Measures

Measure Type	Measure Count
Exhaust Fan	11
Boiler Stands	17
HVAC Exhaust/Ventilation	2
HVAC Plumbing	3
Electrical/Knob and Tube Wiring	10
Asbestos Remediation	14
Vermiculite Remediation	3
Building, Structural, or Crawl Space Repair or Replacement	1
Mold, Moisture, and Black Mold Mitigation	11
Total	72

Low-Income Rental Efficiency: Number of Units in Participating Buildings

Building Type	Quantity Participating
Single-Family	25
Duplex	17
Three-Unit	4
Four-Unit	6
Total	52

Low-Income Free Heating System Tune-Up

The program achieved 65% of its participation goal and 65% of its energy savings goal while program spending was 68% of budget.

Home Service Plus reported that program results in 2023 were affected by a shortage of skilled trades professionals and scheduling staff. These issues have been resolved in 2024.

Non-Profit Affordable Housing Rebates⁴⁶

The program achieved 77% of its participation goal and 104% of its energy savings goal while program spending was 68% of budget.

65 buildings, or 78 residences, participated in the program.

The following table shows the quantities of each type of prescriptive measure installed through the program:

⁴⁶ CenterPoint Energy's program eligibility criteria are developed based on historical experience and market research. However, the Company cannot account for all possible project circumstances. CenterPoint Energy notifies the DOC when it makes project-specific exceptions to its eligibility criteria. In 2023, one such exception was made for a multi-family property exceeding 4 units that participated in NPAH because its services were considered the most appropriate for the circumstances.

Non-Profit Affordable Housing Rebates: Quantity of Measures Installed

Type of Measure	Quantity
Heating System Equipment	37
Thermostats	38
Water Heaters	35
Heat/Energy Recovery Ventilators	31
Weatherization Measures	77
Low-flow Showerheads and Aerators	52
Laundry Equipment	48
Pre-Weatherization	11
Total	329

In 2023, 30 homes participated in the Non-Profit Affordable Housing Rebates program performance path, and no Passive House certification rebates were paid through the Non-Profit Affordable Housing Rebates program.

The following table shows how many participating homes achieved the energy savings required for each rebate tier in the performance path.

Non-Profit Affordable Housing Rebates: Performance Path

Percent Gas Savings Above Code	Quantity of Homes Achieving
10-14%	0
15-19%	2
20-24%	9
25-29%	12
30-34%	6
35-39%	1
40% or above	0
Total	30

The following table shows the quantity of pre-weatherization measures by measure type:

Measure Type	Measure Count
Exhaust Fan	1
CO Smoke Detectors	1
HVAC Exhaust/Ventilation	1
Asbestos Remediation	2
Building, Structural, or Crawl Space Repair or Replacement	2
Mold, Moisture, and Black Mold Mitigation	2
Radon Mitigation	2
Total	11

Low-Income Multi-Family Building Efficiency

The program achieved 67% of its participation goal and 86% of its energy savings goal while program spending was 86% of budget.

The 82 participating buildings had a total of 2,736 units. In 2023, CenterPoint Energy replaced the Low-Income Multi-Family Housing Rebates (“LIMF”) program with the Low-Income Multi-Family Building Efficiency program (“LI MFBE”).⁴⁷ Historically, participation in the Low-Income Multi-Family Housing Rebates program had been highly variable. LI MFBE is a dedicated low-income program that provides the same design and services as the MFBE program. This new version of the program was designed to better support low-income eligible 5+ unit multi-family properties with the addition of new measures and bonus rebates. Program eligibility was also extended to all qualified CenterPoint Energy customers with no restrictions based on a customer’s electric utility. In 2023, the new program resulted in increased performance compared to the LIMF program in 2022. Energy Savings increased by 171% year-over-year and an increase of 148% in participation year-over-year compared to the LIMF program.

The following table shows the quantities of each type of measure rebated through the program:

⁴⁷ *In the Matter of CenterPoint Energy’s 2021-2023 CIP Modification Request*, Docket No. G-008/CIP-20-478, Deputy Commissioner Decision, pp. 32-35 (Nov. 7, 2022).

Low-Income Multi-Family Building Efficiency: Participation Detail

LI MFBE Participation⁴⁸	Goal	Actual	Percent Achieved
Whole Building Participation	104	82	79%
Renter Kit Participation	19	0	0%
Totals	123	82	67%

On November 25, 2020, the Department issued a Decision on CenterPoint Energy’s 2021-2023 *Triennial Plan* that included an order that the Company report additional Multi-Family Building Efficiency program performance metrics for the 2021 CIP Status Report.⁴⁹ These metrics are shown in the table below.

Low-Income Multi-Family Building Efficiency: Completed Program Steps⁵⁰

Building Type	Completed Program Step	Buildings	Units	Energy Savings	Rebates
Low-Income	Assessment	62	2,736	n/a	n/a
Low-Income	Direct Installation	36	1,211	2,390	n/a
Low-Income	Performance Incentives	20	n/a	5,673	\$248,473

⁴⁸ *In the Matter of CenterPoint Energy’s 2021-2023 Natural Gas Conservation Improvement Program Triennial Plan*, Docket No. G-008/CIP-20-478, pp. 143 (Jan. 20, 2021).

⁴⁹ *In the Matter of CenterPoint Energy’s 2021-2023 Natural Gas Conservation Improvement Program Triennial Plan*, Docket No. G-008/CIP-20-479, p. 88 (Nov. 25, 2020).

⁵⁰ Building and unit participation listed in this table may appear to differ from total program participation because the LI MFBE project counts a building as participating if it receives at least one of the following: assessment, direct installation, or performance incentives.

Commercial and Industrial Market Segment Programs

CenterPoint Energy's C&I Market Segment achieved 86% of the segment's participation goal and 108% of its energy savings goal while spending 99% of budget.

CenterPoint Energy submits 2023 year-end information on the following C&I programs:

- Commercial Foodservice Equipment Rebates;
- C&I Heating and Water Heating Rebates;
- C&I Custom Rebates;
- C&I Audit Services;
- Energy Design Assistance;
- Code Compliance Support;
- Industrial Process and Commercial Efficiency;
- C&I Training and Education;
- Benchmarking Services and Certification Assistance;
- Recommissioning Study and Rebates; and
- Multi-Family Building Efficiency.

C&I Market Segment	Program Spending	Program Participation	Energy Savings (Dth)	\$/Dth	BenCost Results (Societal Test)
Commercial Foodservice Equipment Rebates	\$676,014	315	59,685	\$11.33	3.55
C&I Heating and Water Heating Rebates	\$3,374,891	4,712	588,681	\$5.73	4.98
C&I Custom Rebates	\$1,658,931	183	343,781	\$4.83	7.90
C&I Audit Services	\$560,604	342	10,365	\$54.09	1.00
Energy Design Assistance	\$1,469,548	59	131,484	\$11.18	1.75
Code Compliance Support	\$64,888	19	19,446	\$3.34	48.29
Industrial Process & Commercial Efficiency	\$408,988	7	30,512	\$13.40	2.66
C&I Training and Education	\$114,182	987	0	N/A	N/A
Benchmarking Services and Certification Assistance	\$166,515	1,501	0	N/A	N/A
Recommissioning Study and Rebates	\$181,908	23	13,359	\$13.62	1.76
Multi-Family Building Efficiency	\$1,345,728	791	77,994	\$17.25	1.92
C&I Total	\$10,022,197	8,939	1,275,308	\$7.86	3.53

Detailed descriptions of C&I Market Segment programs can be found in *CenterPoint Energy's Approved 2021-2023 Conservation Improvement Program Triennial Plan*.⁵¹

Measurement and Verification Expenses

The Company provides the following information regarding expenses related to energy savings measurement and verification (“M&V”) spending included in the C&I Market Segment spending total:⁵²

2023 M&V Expenses	
Labor	\$18,000
Equipment	\$0
Contracting Expenses	\$0
Total	\$18,000

Three customer projects requiring M&V were completed in 2023 as part of the C&I Custom Rebates program.

Method Used to Determine Achievement of Low-Income and Renter Goals in the C&I Market Segment

Low-income participation in the C&I Market Segment is defined as verified low-income multi-family housing participants. Low-income multi-family housing customers provided documentation to CenterPoint Energy showing pre-qualification for WAP, certification for LIRC, or other documentation including (but not limited to) participation in the project-based Section 8 voucher program. Renter participation was established through a cross-check of Standard Industrial Classification (“SIC”) codes in CenterPoint Energy’s customer information system. Participants with SIC codes representing multi-family housing are considered “renter participants” in the C&I market.

Commercial Foodservice Equipment Rebates

The program achieved 63% of its participation goal and 99% of its energy savings goal while program spending was 95% of budget.

The 150 participating customers installed 315 energy conservation measures through the program.

⁵¹ *CenterPoint Energy's Approved 2021-2023 Conservation Improvement Program Triennial Plan*. Docket No. G-008/CIP-20-478, (Jan. 20, 2021).

⁵² In *CenterPoint Energy's Request for Modification to its Commercial/Industrial Project for its 2008 CIP Program Year*, Docket No. G-008/CIP-06-789, Commissioner Ordering Point 2 (Aug. 25, 2008), the Company was ordered to “track all labor, equipment, and third-party contracting expenses associated with its Measurement and Verification activities and to report these expenses as separate line items in its annual CIP status reports.”

C&I Heating and Water Heating Rebates

The program achieved 63% of its participation goal and 79% of its energy savings goal while program spending was 93% of budget.

The 1,113 participating customers installed 4,712 energy conservation measures through the program. Several customers seeking rebates that would have previously been participants in the C&I Heating and Water Heating program are now a part of the Multi-Family Building Efficiency program due to program changes. The C&I Heating and Water Heating Rebates program gave 23 participants New Normal triple rebates for high-efficiency equipment. The rebated measures had rebates in the amount of \$90,347 to customers who participated in the New Normal Pilot Program.⁵³

C&I Custom Rebates

The program achieved 426% of its participation goal and 223% of its energy savings goal while program spending was 83% of budget. In 2023, CenterPoint Energy completed 19 custom projects and 164 engineering assistance projects.

CenterPoint Energy partnered again with Center for Energy and Environment's ("CEE") One Stop Efficiency Shop in 2023. Technicians/engineers installed thermostats inside buildings they were auditing. The engineers calculated the 12,291 Dth savings and created reports to record these energy savings as well as lists of suggested energy efficiency upgrades for the owners of the buildings. CEE gave the Company a copy of the report with the suggested upgrades and the cost of the installation of the thermostats. With notification to the customer, the Company provided Engineering Assistance Rebates to CEE. The customers are expected to participate in other programs based on the audit report's suggested upgrades.

In 2023, CenterPoint Energy claimed 204,042 Dth in influenced savings from 1 project. This large industrial project involved multiple years of planning and engineering assistance. The Company claimed influenced savings for the project through a Post-M&V report due to the lower-than-expected associated costs for implementation.

C&I Audit Services

The program achieved 170% of its participation goal and 156% of its energy savings goal while program spending was 117% of budget.

⁵³ The New Normal is a pilot program that consists of an energy efficiency pathway for C&I customers (excluding multifamily) in Minneapolis that allows customers to earn bonus rebates that will continue into 2024. See program modifications section for additional details.

In 2023, the C&I Audit Services program had similar participation compared to 2022. The program surpassed the 2023 energy savings and participation goals. Energy savings were lower than in 2022, but 2022 was an extremely successful outlier for the program. In 2022, an opportunity for the scheduling of several existing programmable thermostats for a single customer led to higher-than-normal energy savings. CenterPoint Energy collaborated with Xcel Energy, Wright Hennepin, and Dakota Electric to provide audits identifying both gas and electric savings opportunities for 145 customers.

The following table shows the quantities of each type of service through the program:

C&I Audit Services: Participation and Energy Savings

Type of Measure	Participation	Energy Savings
Natural Gas Energy Analysis	182	5,749
Scoping audit	1	0
Steam trap audit (per trap)	159	4,616
Total	342	10,365

Energy Design Assistance

The program achieved 102% of its participation goal and 87% of its energy savings goal while program spending was 102% of budget.

In 2023, there were 211 enrolled participants in the program; 59 participants completed energy efficiency projects in 2023. Multi-family continues to be the largest category of EDA program participants, with much of that construction happening in Minneapolis. Of the 59 projects that were completed in 2023, 10 qualified as low-income multi-family housing participants serving 974 units of housing and were accordingly provided higher rebates. In 2023, no Passive House or LEED certification incentives were paid through the Energy Design Assistance program.

In alignment with hybrid low-income/market rate program requirements, the following table shows low-income participation, energy savings, and rebates through the program relative to the *2021-2023 CIP Triennial Plan*.

Energy Design Assistance: Low-Income Participation, Energy Savings, and Spending

Low-Income Metrics	Goal	Actual
Participation	8	10
Energy Savings (Dth)	20,639	15,331
Total Spending (\$)	\$196,444	\$252,501
Incentives (\$)	\$103,196	\$122,648

Commercial Code Compliance Support

The program achieved 25% of its participation goal and 167% of its energy savings goal while program spending was 56% of budget.

In 2023, there were 14 program participants. After setting up the implementation process and recruiting cities to participate in the program over the course of the 2021-2023 triennium, several projects were able to participate in 2023. Energy savings per project were higher per project than expected.

Industrial Process and Commercial Efficiency

The program achieved 70% of its participation goal and 177% of its energy savings goal while program spending was 114% of budget.

There were 7 enrolled participants in the program, which paid rebates for 183 pieces of equipment in 2023. Each customer enrolled in the program received either an analysis to identify potential energy savings or a rebate.

C&I Training and Education

The program achieved 97% of its participation goal and 0% of its energy savings goal while program spending was 82% of budget.

Of the 987 participants, 759 participated in high-efficiency foodservice equipment training, 65 in the Seasonal Energy Management Seminar, 106 in the Energy Efficiency and Technology Conference, 27 in the High-Efficiency Boiler Training Seminar, 30 in the Trade Ally Kick Off, and 0 in the Building Operator Certification Training.

C&I Training and Education participation slightly decreased compared to 2022. With this decrease, the program was slightly below its participation goal. The high-efficiency foodservice equipment training saw reduced participation. This is consistent with trends in the foodservice

industry as adoption of high efficiency equipment has slowed due to market factors such as higher interest rates and supply chain backups leading to lower availability of equipment.

The Building Operator Certification Training did not have a participation goal in 2023. CenterPoint Energy was not made aware of any participants associated with customer accounts completing the Building Operator Certification Training in 2023. CenterPoint Energy continues to offer rebates for Building Operator Certification in its *2024-2026 ECO Triennial Plan*. The Company was notified that several participants in a fall 2023 class could potentially be eligible for a rebate. However, at this time it has not been verified that any of these participants have fully completed the Building Operator Certification Training. Once completion is confirmed, eligible participants will receive a rebate for program year 2024.

Benchmarking Services and EnergyStar Certification Assistance

The program achieved 207% of its participation goal, while program spending was 91% of budget.

In 2023, a total of 20 rebates were paid for ENERGY STAR® certification. There were 1481 users of the Energy Data Portal. Participation and new active users in the Energy Data Portal saw a slower rate of growth compared to the previous year. However, more buildings participated compared to the program goal as new benchmarking legislation was enacted with requirements for buildings in several cities.

Recommissioning Study & Rebates

The program achieved 92% of its participation goal and 107% of its energy savings goal while program spending was 122% of budget.

In 2023, the Recommissioning program was evenly balanced with 11 rebates for Study funding and 12 rebates for Implementation projects. The energy savings goal was exceeded as several of the implementation projects were completed at larger commercial buildings resulting in high energy savings per project.

Multi-Family Building Efficiency

The program achieved 313% of its participation goal and 385% of its energy savings goal while program spending was 142% of budget.

MFBE underwent significant program changes for 2023 through a filed program modification.⁵⁴ This modification included the creation of the new dedicated LI MFBE program, with MFBE

⁵⁴ *In the Matter of CenterPoint Energy's 2021-2023 CIP Modification Request*, Docket No. G-008/CIP-20-478, Deputy Commissioner Decision, pp. 32-35 (Nov. 7, 2022).

becoming solely a market rate program. MFBE became available to all eligible CenterPoint Energy customers and was no longer dependent on the customer's electric utility. 30% bonus rebate incentives became part of the MFBE program with no audit required to receive the bonus.

MFBE achieved its participation goal for whole buildings (see the table below). In 2023, MFBE also exceeded its energy savings goal, surpassing the goal by 386%. This overachievement can be attributed to the program changes that were implemented in 2023. Several customers seeking rebates were previously participants in the C&I Heating and Water Heating program are now a part of MFBE. The Company had noted the overperformance of the MFBE program and set energy savings goals for its *2024-2026 ECO Triennial Plan* to accommodate the increase.

Multi-Family Building Efficiency: Participation Detail

MFBE Participation⁵⁵	Goal	Actual	Percent Achieved
Whole Building Participation	196	791	404%
Renter Kit Participation	57	0	0%
Totals	253	791	313%

On November 25, 2020, the Department issued a Decision on CenterPoint Energy's *2021-2023 CIP Triennial Plan* that included an order that the Company report additional Multi-Family Building Efficiency program performance metrics for the 2021 CIP Status Report.⁵⁶ These metrics are shown in the table below.

Multi-Family Building Efficiency: Completed Program Steps⁵⁷

Building Type	Completed Program Step	Buildings	Units	Energy Savings	Rebates
Market Rate	Assessment	240	10,568	n/a	n/a
Market Rate	Direct Installation	106	4,396	7,129	n/a
Market Rate	Performance Incentives	551	n/a	70,865	\$553,114

⁵⁵ *In the Matter of CenterPoint Energy's 2021-2023 Natural Gas Conservation Improvement Program Triennial Plan*, Docket No. G-008/CIP-20-478, pp. 143 (Jan. 20, 2021).

⁵⁶ *In the Matter of CenterPoint Energy's 2021-2023 Natural Gas Conservation Improvement Program Triennial Plan*, Docket No. G-008/CIP-20-479, p. 88 (Nov. 25, 2020).

⁵⁷ Building and unit participation listed in this table may appear to differ from total program participation because the MFBE project counts a building as participating if it receives at least one of the following: assessment, direct installation, or performance incentives.

Other Programs

CenterPoint Energy's Other Program spending was 88% of budget.

CenterPoint Energy submits 2023 year-end information on the following CIP programs:

- Analysis, Evaluation, & Project Development;
- Energy Efficiency Marketing & Awareness;
- Planning and Regulatory Affairs; and
- EZ Pay On-Bill Loan.

Information regarding the Minnesota Efficient Technology Accelerator market transformation program is included in this section. In addition, two Alternative CIPs, EnerChange and Energy Smart, have been approved for inclusion in the Company's CIP. This section includes budgetary information regarding each Alternative CIP, but, as neither Alternative CIP is administered by CenterPoint Energy, the Company asks that any requests for information regarding program activities be directed to the respective program administrators.

Other Programs Total	Program Spending	Program Participation	Energy Savings (Dth)	\$/Dth	BenCost Results (Societal Test)
Analysis, Evaluation, & Project Development	\$1,434,709	0	0	N/A	N/A
Energy Efficiency Marketing & Awareness	\$712,717	0	0	N/A	N/A
Planning & Regulatory Affairs	\$208,928	0	0	N/A	N/A
EZ Pay On-Bill Loan	\$185,157	90	0	N/A	N/A
MN ETA	\$800,716	0	0	N/A	N/A
Other Projects Total	\$3,342,227	90	0	N/A	N/A

Method Used to Determine Achievement of Low-Income and Renter Goals in the Other Programs Segment

The figures regarding low-income participation were established through a cross-check between CenterPoint Energy's CIP participation and Low-Income Home Energy Assistance Program ("LIHEAP") recipient records. Renter participation was established through a cross-check of rental data in CenterPoint Energy's customer information system.

Analysis, Evaluation, & Project Development

CenterPoint Energy's Analysis, Evaluation, & Project Development spending was 94% of budget.

Activities supporting the development of CIP projects included membership in the Gas

Technology Institute's ("GTI") Emerging Technology Program ("ETP"); membership in the Midwest Energy Efficiency Alliance ("MEEA"); membership in the Association of Energy Services Professionals; membership in the North American Gas Heat Pump Collaborative, and participation in various energy efficiency conferences. Company employee time was spent working to develop new CIP offerings, which is included in the total spending for this project, as are costs related to evaluation of existing CIP offerings by external consultants.

In the *2021-2023 CIP Triennial Plan*, CenterPoint Energy proposed a similar budget for this project for evaluation and research and development ("R&D") spending as compared to its last triennial period. The Company requested that only its true R&D spending be counted against the statutory cap on R&D, rather than the full project budget as had been the case in previous Triennial Plans. The Deputy Commissioner approved the request and directed the Company to include a narrative summary of its R&D activities, and the corresponding dollar amounts for each R&D activity, as part of the Company's annual status reports.⁵⁸

Accordingly, the Company provides the following information regarding its 2023 R&D spending and activities. 2023 R&D spending totaled \$251,471 and included:⁵⁹

- \$205,775 for a field pilot of a technology to capture carbon from natural gas appliance flue gases. The pilot is intended to evaluate performance of the technology and assess energy savings benefits to establish whether it is appropriate to include the technology in future CIP programming. To-date installation on 5 units has been full completed and this project continued in 2024.
- \$33,750 in support of a Center for Energy and Environment project to study the impact of the City of Minneapolis and Bloomington's new energy disclosure requirements at the time of home sales. The study originally was planned to conclude in 2021, but funding was extended through 2023 to collect data in a year less significantly affected by Covid-19.
- \$25,000 in support of GTI projects to field test emerging natural-gas driven technologies through the ETP.
- -\$13,054 for a spending credit related to TRC Environmental Corp. research to help develop a codes and standards program. The Company was overcharged in 2022. The study completed in 2023 and learnings were incorporated into program planning (e.g., *2024-2026 ECO Triennial Plan*). A residential and commercial codes program began January 1, 2024.

⁵⁸ *In the Matter of CenterPoint Energy's 2021-2023 Natural Gas Conservation Improvement Program Triennial Plan*, Docket No. G-008/CIP-20-478, Deputy Commissioner Decision, p. 12 (Nov. 25, 2020).

⁵⁹ In the Company's 2020 CIP Status Report, \$90,000 in support of a GTI project to field test emerging natural-gas driven heat pump water heaters was listed. Funds were collected by GTI for 2021, but the project was postponed until 2023. After administrative costs in 2021 of \$10,845, the remaining funds of \$79,155 were allocated to the GTI flex-fund to spend down in 2023-2024. In 2023, \$30,000 of the flex-fund was allocated to a Residential Hybrid Space Heat Techno-Market Study. Other projects funded through this mechanism will be reported in future CIP Status Reports.

In addition to the activities enumerated above, the Company participated in a Midwest Utility R&D Collaborative coordinated by MEEA. This effort began in 2018 with several midwestern utilities (including CenterPoint Energy, ComEd, Nicor Gas, Xcel Energy, DTE, and others) to share energy-efficiency related R&D results and progress in order to identify opportunities to collaborate, avoid duplication of effort, and learn from each other's work. There were no incremental costs associated with participation in the Collaborative in 2023.

Energy Efficiency Marketing & Awareness

Program spending was 95% of budget.

General awareness marketing and promotion of the entire energy efficiency portfolio of programs and services activities, directed at residential and business mass markets, and focusing on the benefits of energy efficiency and natural gas conservation included: network and cable television, Minnesota Public Radio and digital audio, digital (social), web, paid search, events, print ads, and sports sponsorships with the University of Minnesota Gophers and the National Sports Center. The Energy Efficiency Marketing and Awareness program budget paid for these campaigns.

Planning and Regulatory Affairs

Program spending was 99% of budget.

Planning and Regulatory Affairs program expenditures include staff salaries; benefits; and expenses (such as computers, printing, phones, and postage) associated with managing, tracking, and administering CIP.

EZ Pay On-Bill Loan

Program spending was 36% of budget. 2023 was the third full year of the program.

The EZ Pay On-Bill Loan program ("EZPAY") funded 90 new loans, which provided CenterPoint Energy customers with financing for 104 efficient gas measures. 74 non-gas energy efficiency measures were also funded by the loans, primarily cooling equipment, but also including non-rebate eligible thermostats and asbestos/vermiculate remediation. 43 customers were not eligible to participate – 24 customers did not meet CenterPoint Energy's account eligibility requirements (e.g., account in arrears, rental property, etc.) and 19 customers were not eligible for the loan according to the loan provider's requirements. 1 customer was removed from the EZPAY program for non-payment of their loan.

In 2023, the number of EZPAY loans, and trade allies that registered to be participating dealers, more than doubled from the 38 total from program year 2022. CenterPoint Energy believes that there is a need for on-bill repayment especially with inflation pressure and growing consumer interest in products that qualify for a federal tax credit under the Inflation Reduction Act (“IRA”). With 2023 seeing another increase in year over year participation, the Company expects participation to increase again in 2024 with newly released guidance on IRA tax credits. In 2023, the Company worked on increasing trade ally participation by continuing to build awareness with trade allies that submit rebates for equipment that qualifies for an EZPAY loan.

Minnesota Efficient Technology Accelerator

The 92nd Minnesota Legislature (2021-2022) passed the Minnesota Efficient Technology Accelerator (“ETA”) which includes changes to the statutes governing CIP to allow for a nonprofit within Minnesota to run a market transformation program. CEE began implementation of their 5-year ETA plan in 2023⁶⁰. The initial plan included 4 starter initiatives for gas or hybrid-fuel applications:

- Hybrid Air-Source Heat Pumps
- High-Performance Windows
- High-Performance Roof-top Units
- Gas Heat Pump Technologies

In 2023, program spending was \$800,716. Costs associated with CenterPoint Energy staff participation are not included in this number. These costs are categorized within the appropriate program (e.g., windows through Home Insulation Rebates).

Because ETA is managed by CEE, CenterPoint Energy asks that any requests for additional information regarding program activity be directed to CEE. CenterPoint Energy participates in ETA through coordination committees as well as collaboration through ad hoc means on specific starter initiatives. The Company and CEE continued to work on developing the initiatives in 2023. While no energy savings forecast has been developed at this time, initiatives in ETA could lead to claimed energy savings as part of the program in future years.

EnerChange

Program spending was 96% of budget.

The EnerChange program was proposed for inclusion in the Company’s CIP by the National Initiative by Consumers of Energy d/b/a EnerChange (“EnerChange”). The Deputy Commissioner approved the EnerChange program with a total budget of \$361,000 for the 2023

⁶⁰ *Center for Energy and Environment’s Proposal to Implement the Minnesota Efficient Technology Accelerator, Under Minnesota Statute 216B.241, Section 17, Subdivision 14, Docket Number E,G999/CIP-21-548 (April 15, 2022).*

program year.⁶¹ The program is an indirect-impact conservation program for which no energy savings are claimed. EnerChange filed its Annual Program Status Report for 2023 on March 27, 2024 in Docket No. G-008/CIP-20-478. Because this program is an Alternative CIP proposed and managed by EnerChange, CenterPoint Energy asks that any requests for additional information regarding program activity be directed to EnerChange.

Energy Smart

Program spending was 99% of budget.

The Energy Smart program was proposed for inclusion in the Company's CIP by the Minnesota Waste Wise Foundation ("MWWF"). The Deputy Commissioner approved the Energy Smart program with a total budget of \$183,250 for the 2023 program year.⁶² The program is an indirect-impact conservation program for which no energy savings are claimed. The Energy Smart annual report for 2023 was filed on April 1, 2024 in Docket No. G-008/CIP-20-478. Because this program is an Alternative CIP proposed and managed by MWWF, CenterPoint Energy asks that any requests for additional information regarding program activity be directed to MWWF.

⁶¹ *In the Matter of CenterPoint Energy's 2021-2023 Natural Gas Conservation Improvement Program Triennial Plan*, Docket No. G-008/CIP-20-478, Deputy Commissioner Decision, p. 46 (Nov. 25, 2020).

⁶² *In the Matter of CenterPoint Energy's 2021-2023 Natural Gas Conservation Improvement Program Triennial Plan*, Docket No. G-008/CIP-20-478, Deputy Commissioner Decision, p. 44 (Nov. 25, 2020).

Total Program Cost-Benefit Analysis

The BenCosts provided below include the cost-benefit analyses for the Company's total 2023 CIP goals and actual results.⁶³

Conservation Improvement Program (CIP)		BENEFIT COST FOR GAS CIPS-- Cost-Effectiveness Analysis				
Company: CenterPoint Energy Project: Total CenterPoint Energy CIP 2023 Goal (Full Behavioral Savings)						
Input Data			First Year	Second Year	Third Year	Year
1) Retail Rate (\$/Dth) =	\$5.36	16 Utility Project Costs				
Escalation Rate =	4.69%	16 a) Administrative & Operating Costs =	\$ -	\$ -	\$ -	24,138,113
2) Non-Gas Fuel Retail Rate (\$/Fuel Unit) =	\$0.000	16 b) Incentive Costs =	\$ -	\$ -	\$ -	17,143,252
Escalation Rate =	3.59%	16 c) Total Utility Project Costs =	\$ -	\$ -	\$ -	41,281,365
Non-Gas Fuel Units (ie. kWh,Gallons, etc) =	kWh	17) Direct Participant Costs (\$/Part.) =				164.85
3) Commodity Cost (\$/Dth) =	\$3.25	18) Participant Non-Energy Costs (Annual \$/Part.) =				
Escalation Rate =	4.69%	Escalation Rate =	2.30%	2.30%		2.30%
4) Demand Cost (\$/Dth/Yr) =	\$115.55	19) Participant Non-Energy Savings (Annual \$/Part.) =				
Escalation Rate =	4.69%	Escalation Rate =	2.30%	2.30%		2.30%
5) Peak Reduction Factor =	1.00%	20) Project Life (Years) =				10,800
6) Variable O&M (\$/Dth) =	\$0.0500	21) Avg. Dth/Part. Saved =	#DIV/0!	#DIV/0!		6.49
Escalation Rate =	4.69%	22) Avg Non-Gas Fuel Units/Part. Saved =	0 kWh	0 kWh		0 kWh
7) Non-Gas Fuel Cost (\$/Fuel Unit) =	\$0.000	22a) Avg Additional Non-Gas Fuel Units/ Part. Used =	0 kWh	0 kWh		0 kWh
Escalation Rate =	3.59%	23) Number of Participants =	0			328,935
8) Non-Gas Fuel Loss Factor	7.70%	24) Total Annual Dth Saved =	0			2,133,933
9) Gas Environmental Damage Factor (\$/Dth) =	\$2.0700	25) Incentive/Participant =	#DIV/0!	#DIV/0!		\$52.12
Escalation Rate =	2.30%					
10) Non Gas Fuel Enviro. Damage Factor (\$/Unit) :	\$0.0198					
Escalation Rate =	2.30%					
11) Participant Discount Rate =	5.39%					
12) CIP Utility Discount Rate =	5.39%					
13) Societal Discount Rate =	3.02%					
14) General Input Data Year =	2020					
15a) Project Analysis Year 1 =	2021					
15b) Project Analysis Year 2 =	2022					
15c) Project Analysis Year 3 =	2023					

Cost Summary	1st Yr	2nd Yr	3rd Yr	Test Results	Triennial NPV	Triennial B/C
Utility Cost per Participant =	#DIV/0!	#DIV/0!	125.50	Ratepayer Impact Measure Test	(\$58,492,044)	0.64
Cost per Participant per MCF =	#DIV/0!	#DIV/0!	44.76	Utility Cost Test	\$67,356,247	2.81
Lifetime Energy Reduction (MCF)	23,473,261			Societal Test	\$96,195,348	2.30
Societal Cost per MCF	\$3.15			Participant Test	\$92,462,848	2.89

⁶³ Behavioral energy savings are reported consistent with *In the Matter of Inclusion of Behavioral Project Savings in Energy Conservation Improvement Programs and Shared Savings Demand-Side Management Financial Incentive Calculations*, Docket No. E,G-999/CI-08-133, et al., Deputy Commissioner Decision (Apr. 26, 2012). In accordance with the Average Savings Method, the full savings for behavioral programs are used for BenCost analyses; reduced savings are used elsewhere in the report. Alternative CIP project and CIP assessments are excluded from spending used in all BenCost modeling.

Conservation Improvement Program (CIP)

BENEFIT COST FOR GAS CIPS-- Cost-Effectiveness Analysis

Company: **CenterPoint Energy**
 Project: **CenterPoint Energy CIP 2023 Total Actual (Full Behavioral Savings)**

Input Data		First Year	Second Year	Third Year
1) Retail Rate (\$/MCF) =	\$6.21			
Escalation Rate =	4.69%			
2) Non-Gas Fuel Retail Rate (\$/Fuel Unit) =	\$0.000			
Escalation Rate =	3.59%			
Non-Gas Fuel Units (ie. kWh,Gallons, etc) =	kWh			
3) Commodity Cost (\$/MCF) =	\$3.25			
Escalation Rate =	4.69%			
4) Demand Cost (\$/Unit/Yr) =	\$115.55			
Escalation Rate =	4.69%			
5) Peak Reduction Factor =	1.00%			
6) Variable O&M (\$/MCF) =	\$0.0500			
Escalation Rate =	4.69%			
7) Non-Gas Fuel Cost (\$/Fuel Unit) =	\$0.000			
Escalation Rate =	3.59%			
8) Non-Gas Fuel Loss Factor	7.70%			
9) Gas Environmental Damage Factor =	\$2.0700			
Escalation Rate =	2.30%			
10) Non Gas Fuel Enviro. Damage Factor (\$/Unit)	\$0.0198			
Escalation Rate =	2.30%			
11) Participant Discount Rate =	3.02%			
12) Utility Discount Rate =	5.39%			
13) Societal Discount Rate =	3.02%			
14) General Input Data Year =	2020			
15a) Project Analysis Year 1 =	2021			
15b) Project Analysis Year 2 =	2022			
15c) Project Analysis Year 3 =	2023			
16 Utility Project Costs				
16 a) Administrative & Operating Costs =			\$	17,074,233
16 b) Incentive Costs =			\$	18,015,586
16 c) Total Utility Project Costs =		\$ -	\$ -	\$ 35,089,819
17) Direct Participant Costs (\$/Part) =				182.60
18) Participant Non-Energy Costs (Annual \$/Part) =		-	-	-
Escalation Rate =		2.16%	2.16%	2.16%
19) Participant Non-Energy Savings (Annual \$/Part) =		-	-	-
Escalation Rate =		2.16%	2.16%	2.16%
20) Project Life (Years) =				11.647
21) Avg. MCF/Part. Saved =		#DIV/0!	#DIV/0!	7.010
22) Avg Non-Gas Fuel Units/Part. Saved =		0 kWh	0 kWh	0 kWh
22a) Avg Additional Non-Gas Fuel Units/ Part. Used =		0 kWh	0 kWh	0 kWh
23) Number of Participants =				310,965
24) Total Annual MCF Saved =				2,179,903
25) Incentive/Participant =		#DIV/0!	#DIV/0!	\$57.93

Cost Summary	1st Yr	2nd Yr	3rd Yr	Test Results	Triennial NPV	Triennial B/C
Utility Cost per Participant =	#DIV/0!	#DIV/0!	112.84	Ratepayer Impact Measure Test	(\$77,185,120)	0.60
Cost per Participant per MCF =	#DIV/0!	#DIV/0!	42.1446846			
Lifetime Energy Reduction (MCF)	26,158,838			Utility Cost Test	\$84,506,619	3.67
Societal Cost per MCF	2.660251787			Societal Test	\$120,850,973	2.74
				Participant Test	\$155,484,435	3.91

SECTION 2: 2023 DEMAND-SIDE MANAGEMENT FINANCIAL INCENTIVE REPORT

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, (“CenterPoint Energy” or the “Company”) submits this report in compliance with the Minnesota Public Utilities Commission’s (“Commission”) *Order Establishing Utility Performance Incentives for Energy Conservation* (“Order”) and the Commission’s Rules of Practice and Procedure.^{64 65}

CenterPoint Energy used the financial incentive mechanism approved by the Commission to calculate the requested financial incentive amount.⁶⁶ Details of the calculation of the financial incentive are included in Attachment A of this filing. The calculations also rely on the results of the BenCost cost-effectiveness analysis of the Company’s 2023 Conservation Improvement Program (“CIP”). In 2023, the Company elected to exclude cost-ineffective low-income projects for its cost-effectiveness testing used in the calculation of the financial incentive as permitted by statute.⁶⁷ The low-income segment is not cost-effective based on the societal or utility test. Attachment B shows 2023 CIP cost-effectiveness testing without the low-income projects that are cost-ineffective,⁶⁸ which results in total net benefits of \$84,506,619. The following table summarizes how removing the low-income segment changes the assessment of net benefits using the utility cost test:

Adjustment to Conservation Improvement Program Net Benefits	
Utility Cost Test Net Benefits with the Cost-Ineffective Low-Income Projects	\$80,207,214
Utility Cost Test Net Benefits without the Cost-Ineffective Low-Income Projects	\$84,506,619

As permitted by Commission Order, CenterPoint Energy excluded the third-party EnerChange and Energy Smart projects from its financial incentive calculations;⁶⁹ the figures given here and in Attachments A and B reflect that election. Assessments under Minnesota Statute § 216B.241 and the Next Generation Energy Act of 2007 (“NGEA”) are also excluded from the calculation of

⁶⁴ As described in *In the Matter of Commission Review of Utility Performance Incentives for Energy Conservation Pursuant to Minn. Stat. § 216B.241, Subd. 2c*, Docket No. E,G-999/CI-08-133, Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan (Dec. 9, 2020).

⁶⁵ Minn. R. Ch. 7829.

⁶⁶ See *Id.* 64.

⁶⁷ Minn. Stat. § 216B.241, Subd. 7i permits, at the discretion of the utility, the exclusion of low-income costs and benefits associated with any approved low-income gas CIP from the calculation of net economic benefits for the purposes of calculating the financial incentive when these programs are not cost-effective.

⁶⁸ Low-Income Weatherization, Low-Income Rental Efficiency, Low-Income Heating System Tune-ups, Non-Profit Affordable Housing Rebates, Low-Income Multifamily Building Efficiency.

⁶⁹ See *Id.* 64.

the incentive in accordance with Commission Order.⁷⁰ The following table summarizes these adjustments to the Company's 2023 CIP spending:

Adjustments to Post-Year Spending	
Total Spending (from CIP Tracker Report)	\$42,710,890
Exclude NGEA Assessments	\$694,872
Exclude EnerChange and Energy Smart	\$531,834
Total Post-Year Spending	\$41,484,184

As detailed in the *2023 Conservation Improvement Program Status Report* section of this filing, the Company's total energy savings in 2023 were 2,009,051 dekatherms ("Dth"), or 1.35 percent of retail sales.⁷¹ As shown in the worksheets in Attachment A, this level of performance qualifies the Company for a financial incentive award of up to 10 percent of the net benefits achieved with a cap limiting the incentive to no more than 30 percent of 2023 CIP expenditures. Ten percent of 2023 net benefits is \$8,450,662, and 30 percent of 2023 spending is \$12,445,255. The tables below illustrate the calculation of the Company's CIP financial incentive based on the net benefits.

CenterPoint Energy's 2023 Financial Incentive as a Percent of Net Benefits without Regard to Expenditure Cap	
2023 Energy Savings	2,009,051 Dth
Energy Savings as Percent of Retail Sales	1.35%
2023 Net Benefits Achieved	\$84,506,619
Percent of Net Benefits Awarded at Percent of Retail Sales Avoided	10%
2023 Financial Incentive Eligibility Calculated as a Percent of Net Benefits	\$8,450,662

CenterPoint Energy's 2023 Financial Incentive Cap on CIP Program Expenditures	
2023 CIP Spending	\$41,484,184
Commission-approved Cap on Incentive as a Percent of Expenditures	30%
2023 Financial Incentive Eligibility Calculated as a Percent of CIP Expenditures	\$12,445,255

CenterPoint Energy's 2023 CIP efforts will result in approximately \$76,055,957 in net benefits after the incentive.

⁷⁰ See *Id.* 64.

⁷¹ The Company's 2017-2019 three-year-average weather-normalized sales to non-CIP-exempt customers were 148,546,443 Dth. See Compliance Overview section.

Summary of CenterPoint Energy's 2023 Requested Financial Incentive	
Requested 2023 Financial Incentive	\$8,450,662
Requested Incentive as a Percent of Net Benefits Achieved	10%
2023 Total Net Benefits Achieved	\$84,506,619
2023 CIP Net Benefits After Requested Incentive	\$76,055,957

The Company respectfully requests the Commission approve CenterPoint Energy's 2023 CIP financial incentive in the amount of **\$8,450,662**, to be entered in the Company's CIP Tracker as of the issue date of the Commission's Order.

SECTION 3: CONSERVATION IMPROVEMENT PROGRAM

TRACKER REPORT

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, (“CenterPoint Energy” or the “Company”) presents its Conservation Improvement Program (“CIP”) Tracker activity in the table at the end of this section.

The 2023 CIP Tracker Report beginning balance was an under-recovery of \$6,015,525.⁷² The ending balance on December 31, 2023 was an under-recovery of \$6,131,707. The 2023 CIP Tracker Report reflects recovery of the interim Conservation Cost Recovery Charge (“CCRC”) of \$0.2469 per dekatherm (“Dth”) from the 2021 rate case. This interim rate went into effect on January 1, 2022, and the same final rate went into effect on February 1, 2023.⁷³ The amount recovered via the CCRC is reflected in line 11.

On September 21, 2022, the Commission approved a Conservation Cost Recovery Adjustment (“CCRA”) of \$0.0905 per Dth.⁷⁴ The new CCRA rate went into effect October 1, 2022. On September 5, 2023, the Commission approved a CCRA of \$0.0926 per Dth.⁷⁵ The new CCRA rate went into effect October 1, 2023, and remains in effect. The amount recovered via the CCRA is reflected in the table (line 15) at the end of this section. See Section 4 of this filing for more discussion of the new CCRA proposal.

Monthly CIP expenses are shown in the table as a single total (line 2). These deferred expense totals include assessments made by the Department of Commerce under Minnesota Statutes § 216B.241 and the Next Generation Energy Act of 2007 (“NGEA”). These assessments have not been included in the total CIP spending reported in Section 1 of this filing but are included in the CIP Tracker because the NGEA provides for utilities to recover the assessments through the CIP Tracker mechanism.⁷⁶ Spending on alternative third-party CIPs is also excluded from total spending reported in Section 1 of this filing but included in the CIP Tracker. As described in Section 1, total CIP spending in 2023 was \$41,484,184; the assessments totaled \$694,872 and spending on alternative third-party CIPs totaled \$531,834, resulting in total recoverable CIP expenses of \$42,710,890 in 2023. Assessments and alternative third-party CIP spending were also excluded from the calculation of the financial incentive requested in Section 2 of this filing.

⁷² *In the Matter of CenterPoint Energy’s 2022 Conservation Improvement Program (CIP) Cost Recovery*, Docket No. G-008/M-23-182, Ordering Point 2 (Sept. 5, 2023).

⁷³ *In the Matter of the Application by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G-008/GR-21-435, (Jan. 30, 2023).

⁷⁴ *In the Matter of CenterPoint Energy’s 2021 Conservation Improvement Program (CIP) Cost Recovery*, Docket No. G-008/M-22-215, Ordering Point 3 (Sept. 21, 2022).

⁷⁵ *In the Matter of CenterPoint Energy’s 2022 Conservation Improvement Program (CIP) Cost Recovery*, Docket No. G-008/M-23-182, Ordering Point 3 (Sept. 5, 2023).

⁷⁶ Minn. Stat. § 216B.241, subd. 2b.

Miscellaneous Expenses

Included in the 2023 CIP expenses are various meals, travel, and miscellaneous CIP-related expenses.⁷⁷

CenterPoint Energy believes it is necessary and reasonable to spend a modest amount of ratepayer funds on meals, travel, and miscellaneous expenses to encourage participation in the Company's CIP projects and to educate staff on new energy efficiency technologies and best practices for program design and delivery. Examples of reasonable and necessary expenses supporting CIP include dues for Company membership in energy efficiency-related organizations, employee participation in energy efficiency workshops and conferences, employee training, and a variety of miscellaneous expenses such as program related mileage and parking expenses for employees involved in delivering and promoting CIP.

These miscellaneous expenses of \$82,425 are 0.20 percent of the total non-assessment, non-third party-alternative CIP, expenses included for recovery in this docket (\$41,484,184). The total amount of 2023 spending in each miscellaneous expense category is as follows:

Category	Expense
Meals	\$7,859
Entertainment	\$0
Miscellaneous (Subtotal)	\$50,531
<i>In Town Parking and Mileage</i>	\$4,412
<i>Employee Training</i>	\$6,354
<i>Conference Registration Fees</i>	\$2,935
<i>Membership Dues</i>	\$17,462
<i>Employee Professional Dues/Licenses</i>	\$274
<i>Awards and Gifts</i>	\$19,095
<i>Other Miscellaneous Expenses</i>	\$0
Employee Travel	\$24,034
Total	\$82,425

The various categories listed above are generally defined as follows:

"Meals" includes expenses for meals taken with customers, vendors, or other employees at which specific Company business discussions take place or meals taken by the employee while away from their normal work location on a business day trip.

"Entertainment" includes expenses for outings with customers, clients, vendors, or others who are seeking to do business with the Company to clubs, theaters, or sporting events, etc. when a business discussion takes place immediately before, during, or immediately after the event.

⁷⁷ Minn. Stat. § 216B.16, subd. 17.

“Miscellaneous Subtotal” includes other business-related expenses not specifically covered under another expense category. CenterPoint Energy has further divided this expense category into the following subcategories: in-town parking and mileage expenses, employee training expenses, conference registration fees, fees for membership in various organizations,⁷⁸ employee professional dues and license fees, awards and gifts,⁷⁹ and other miscellaneous expenses.

“Employee Travel” includes expenses incurred while on a business trip requiring an overnight stay, including items such as airfare, lodging, and travel meals for the employee.

CenterPoint Energy tracks CIP-related spending separately from other utility spending, using Federal Energy Regulatory Commission account numbers to ensure that conservation-related expenses are not recorded in non-conservation accounts and vice-versa. This, in turn, ensures ratepayers are not charged twice for a single expense; conservation expenses are approved through the annual CIP Tracker filings while non-conservation expenses are addressed in other proceedings (e.g., utility rate cases). The CIP-related expenses are incorporated into the Company’s CIP BenCost analysis through their inclusion in the Company’s total CIP spending for 2023.

⁷⁸ In 2023, most expenses included in this subcategory represent fees for Company membership in the Association of Energy Services Professionals, Energy Solutions Center’s Industrial and Foodservice consortia, the Gas Technology Institute Emerging Technologies Program, the Midwest Energy Efficiency Alliance, and the Minnesota Plumbing-Heating-Cooling Contractors Association.

⁷⁹ CenterPoint Energy incentivizes its customer service representatives to promote CIP by providing gift cards to call center employees who refer commercial and industrial customers to CIP offerings. The majority of expenses included in the 2023 awards and gifts subcategory are gift cards provided through this incentive program.

CenterPoint Energy Minnesota Gas

CIP Tracker and Balance

2023 Actuals

CCRC final rate approved in the 2021 rate case (Docket No. G-008/GR-21-435)

Approved CCRA rate (Jan-Sept) of \$0.0905/Dth (Docket No. G-008/M-22-215)

Approved CCRA rate (Oct-Dec) of \$0.0926/Dth (Docket No. G-008/M-23-182)

	Jan 23	Feb 23	Mar 23	Apr 23	May 23	June 23	July 23	Aug 23	Sept 23	Oct 23	Nov 23	Dec 23	Annual Summary	
	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual		
Expenses														
1	Beginning Tracker Balance (\$) - Under / (Over) Recovered	6,015,525	(2,850,652)	(8,523,684)	(11,264,571)	(13,859,294)	(14,814,613)	(13,385,018)	(10,185,135)	(9,265,622)	521,410	2,240,688	2,194,811	6,015,525
2	CIP Program Expenditures	(261,915)	2,470,781	4,915,147	3,132,261	2,607,735	3,089,033	4,547,092	2,356,478	3,498,048	3,459,873	3,596,238	9,300,119	42,710,890
3	Performance Incentive									7,673,591				7,673,591
4	Total Expenses & Incentive (Line 1 + Line 2 + Line 3)	5,753,610	(379,871)	(3,608,537)	(8,132,310)	(11,251,559)	(11,725,580)	(8,837,926)	(7,828,657)	1,906,017	3,981,283	5,836,926	11,494,931	56,400,006
Recovery														
5	Total Volumes (Dt)	27,800,203	27,350,518	25,175,374	20,842,827	14,287,151	7,670,179	8,263,011	8,917,884	8,289,849	8,590,832	13,370,342	18,979,016	189,537,184
6	Exemptions (Dt)	2,306,466	3,219,609	2,492,046	3,878,672	3,737,199	2,761,260	4,277,301	4,665,523	4,185,963	3,448,101	2,641,194	3,177,647	40,790,980
7	Volumes Less Exemptions (Dt) (Line 5 - Line 6)	25,493,737	24,130,908	22,683,329	16,964,156	10,549,952	4,908,918	3,985,710	4,252,361	4,103,886	5,142,731	10,729,147	15,801,368	148,746,204
8	Base Rate Recovery (CCRC) (per Dt)	0.2469	0.2469	0.2469	0.2469	0.2469	0.2469	0.2469	0.2469	0.2469	0.2469	0.2469	0.2469	
9	Base Rate Cost Recovery (\$) (Line 7 x Line 8)	(6,294,404)	(5,957,921)	(5,600,514)	(4,188,450)	(2,604,783)	(1,212,012)	(984,072)	(1,049,908)	(1,013,250)	(1,269,740)	(2,649,026)	(3,901,358)	(36,725,438)
10	Adjustment for final CCRC rate implementation	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Net CCRC Recovery (Line 9 + Line 10)	(6,294,404)	(5,957,921)	(5,600,514)	(4,188,450)	(2,604,783)	(1,212,012)	(984,072)	(1,049,908)	(1,013,250)	(1,269,740)	(2,649,026)	(3,901,358)	(36,725,438)
12	CCRA (per Dt)	0.0905	0.0905	0.0905	0.0905	0.0905	0.0905	0.0905	0.0905	0.0905	0.0926	0.0926	0.0926	
13	Base Rate Cost Recovery (\$) (Line 7 x Line 12)	(2,307,183)	(2,183,847)	(2,052,841)	(1,535,256)	(954,771)	(444,257)	(360,707)	(384,839)	(371,402)	(476,217)	(993,519)	(1,463,207)	(13,528,045)
14	Adjustments to CCRA Recovery	-	-	-	-	-	-	-	-	-	4,921	-	-	4,921
15	Net CCRA Recovery (\$) (Line 13 x Line 14)	(2,307,183)	(2,183,847)	(2,052,841)	(1,535,256)	(954,771)	(444,257)	(360,707)	(384,839)	(371,402)	(471,296)	(993,519)	(1,463,207)	(13,523,124)
16	Total Recovery (Lines 11 + Line 15)	(8,601,587)	(8,141,768)	(7,653,355)	(5,723,706)	(3,559,554)	(1,656,269)	(1,344,779)	(1,434,747)	(1,384,651)	(1,741,036)	(3,642,546)	(5,364,565)	(50,248,562)
Carrying Charges														
17	Sub-Balance (\$) (Line 4 + Line 16)	(2,847,977)	(8,521,639)	(11,261,892)	(13,856,016)	(14,811,113)	(13,381,849)	(10,182,705)	(9,263,404)	521,366	2,240,247	2,194,380	6,130,366	6,151,444
18	Deferred Income Tax ((Line 17 - Line 1) x 28.742%)	2,547,548	1,629,955	787,016	744,833	273,572	(411,805)	(920,409)	(264,924)	(2,812,976)	(494,028)	13,310	(1,131,157)	
19	ADIT (Line 18 + Line 19 prior month)	588,619	2,218,574	3,005,590	3,750,423	4,023,995	3,612,190	2,691,781	2,426,857	(386,119)	(880,147)	(866,837)	(1,997,994)	
20	Net Investment (Line 17 + Line 19)	(2,259,358)	(6,303,065)	(8,256,302)	(10,105,593)	(10,787,118)	(9,769,659)	(7,490,924)	(6,836,547)	135,247	1,360,100	1,327,543	4,132,372	
21	Carrying Charge Rate	0.12%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	
22	Carrying Charge (Line 20 x Line 21)	(2,675)	(2,045)	(2,679)	(3,278)	(3,500)	(3,169)	(2,430)	(2,218)	44	441	431	1,341	(19,737)
23	Ending Tracker Balance - Under / (Over) Recovered (Line 17 + Line 22)	(2,850,652)	(8,523,684)	(11,264,571)	(13,859,294)	(14,814,613)	(13,385,018)	(10,185,135)	(9,265,622)	521,410	2,240,688	2,194,811	6,131,707	6,131,707

Notes on the CIP Tracker Report:

1. Line 1: January beginning balance is equal to the December 31, 2022, ending balance of \$6,015,525, approved in *In the Matter of CenterPoint Energy's 2022 Conservation Improvement Program (CIP) Cost Recovery, Docket No. G-008/M-23-182, Ordering Point 2 (Sept. 5, 2023)*.
2. Line 2: CIP expenditures include all program expenses as well as all assessments made by the Department of Commerce under Minnesota Statute § 216B.241 and the NGEA.
3. Line 3: The Company's 2022 CIP Financial Incentive, approved in *In the Matter of CenterPoint Energy's 2022 Conservation Improvement Program (CIP) Cost Recovery, Docket No. G-008/M-23-182, Ordering Point 1 (Sept. 5, 2023)*.
4. Line 8: The interim CCRC in the amount of \$0.2469 per Dth was implemented as a part of the 2021 rate case. *In the Matter of the Application by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G-008/GR-21-435, (Sept. 24, 2021) and went into effect January 1, 2022. The \$0.2469 per Dth interim rate became the final rate on February 1, 2023. *In the Matter of the Application by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G-008/GR-21-435, (Jan. 17, 2023).
5. Line 10: The final CCRC rate was the same as the interim CCRC rate. Therefore there was not an adjustment of recovery as the result of a rate change.
6. Line 12: The CCRA in the amount of \$0.0905 per Dth was implemented October 1, 2022 pursuant to *In the Matter of CenterPoint Energy's 2021 Conservation Improvement Program (CIP) Cost Recovery*, Docket No. G-008/M-22-215, Ordering Point 3 (Sept. 21, 2022). The CCRA in the amount of \$0.0926 per Dth was implemented October 1, 2023 pursuant to *In the Matter of CenterPoint Energy's 2022 Conservation Improvement Program (CIP) Cost Recovery*, Docket No. G-008/M-23-182, Ordering Point 3 (Sept. 21, 2022).
7. Line 14 (Oct.): Upon implementation of the current CCRA, the Company's CIP Tracker account was adjusted to account for the misalignment of the Company's billing cycle with the October 1, 2023, effective date of the new CCRA.
8. Line 19: ADIT in each month is calculated based on monthly deferred income tax and the previous month's ADIT.
9. Line 21: In January 2023, the short-term debt interest factor (1.43%) used to calculate carrying charges is a monthly factor calculated from the annual rates specified in the 2019 rate case from *In the Matter of the Application of CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, for Authority to Increase Rates for Natural Gas Utility Service in Minnesota*, Docket No. G-008/GR-19-524, Findings of Fact, Conclusions of Law, and Recommendation to Approve the Parties' Settlements, p. 15 (Nov. 20, 2020). As approved by the Commission in *In the Matter of the Application by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas (CPE) for Authority to Increase Natural Gas Utility Service in Minnesota*, Docket No. G-008/GR-19-524, Order (Mar. 1, 2021). From February through December 2023, the short-term debt interest factor (0.39%) used to calculate carrying charges is a monthly factor calculated from the annual rates specified in the 2021 rate case from *In the Matter of the Application of CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, for Authority to Increase Rates for Natural Gas Utility Service in Minnesota*, Docket No. G-008/GR-21-435, Order (Jan. 17, 2023).

Carrying Charges

The calculation of carrying charges in the 2023 CIP Tracker for January is based on the short-term interest factor used in the 2019 rate case settlement.⁸⁰ The calculation of carrying charges in the 2023 CIP Tracker for February through December is based on the short-term interest factor used in the 2021 rate case settlement.⁸¹

The 2023 year-end CIP Tracker under-recovered balance of \$6,131,707 includes \$19,737 in 2023 carrying charges in the customers' favor. The calculation of the monthly interest factors is shown below.

In January:

$$\begin{aligned}\text{Annual Interest Factor} &= \text{Cost of Short-Term Debt} \\ &= 1.43\%\end{aligned}$$

$$\begin{aligned}\text{Monthly Interest Factor} &= ((1 + \text{Annual Interest Factor})^{(1/12)}) - 1 \\ &= ((1 + 0.0143)^{(1/12)}) - 1 \\ &= 0.0012 \\ &= 0.12\%\end{aligned}$$

From February Through December:

$$\begin{aligned}\text{Annual Interest Factor} &= \text{Cost of Short-Term Debt} \\ &= 0.39\%\end{aligned}$$

$$\begin{aligned}\text{Monthly Interest Factor} &= ((1 + \text{Annual Interest Factor})^{(1/12)}) - 1 \\ &= ((1 + 0.039)^{(1/12)}) - 1 \\ &= 0.0012 \\ &= 0.03\%\end{aligned}$$

⁸⁰ *In the Matter of the Application of CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, for Authority to Increase Rates for Natural Gas Utility Service in Minnesota*, Docket No. G-008/GR-19-524, Findings of Fact, Conclusions of Law, and Recommendation to Approve the Parties' Settlements, p. 15 (Nov. 20, 2020). As approved by the Commission in *In the Matter of the Application by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas (CPE) for Authority to Increase Natural Gas Utility Service in Minnesota*, Docket No. G-008/GR-19-524, Order (Mar. 1, 2021).

⁸¹ *In the Matter of the Application of CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, for Authority to Increase Rates for Natural Gas Utility Service in Minnesota*, Docket No. G-008/GR-21-435, Order (Jan. 17, 2023).

SECTION 4: CONSERVATION COST RECOVERY ADJUSTMENT PROPOSAL

Overview

On September 5, 2023, the Minnesota Public Utilities Commission (“Commission”) approved the request of CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, (“CenterPoint Energy” or the “Company”) to implement the Conservation Cost Recovery Adjustment (“CCRA”) in the amount of \$0.0926 per dekatherm (“Dth”), which went into effect on October 1, 2023.⁸² The purpose of the CCRA is to allow the Company to recover approved Conservation Improvement Program (“CIP”) expenses not recovered through the Conservation Cost Recovery Charge (“CCRC”), which is included in base rates. The Commission has required CenterPoint Energy to file its requests to modify the CCRA along with its CIP Tracker and Financial Incentive filings on May 1 of each year.⁸³

With this filing, CenterPoint Energy proposes to increase the CCRA to \$0.1704 per Dth beginning October 1, 2024. This rate is designed to reduce the CIP Tracker balance as close to zero as possible by the end of 2025. In the event that Commission approval of the proposed adjustment is delayed beyond September 20, 2024 (in order to implement the rate change by October 1), the Company will continue to apply the current CIP Adjustment of \$0.0926 per Dth up to the first of the month following Commission approval of a revised factor. In this case, the Company may recalculate the CCRA.

Projection Assumptions

To evaluate a new CCRA proposal, CenterPoint Energy projected CIP spending and recovery for 2024 and 2025. Projections for 2024 and 2025 can be found in Attachments C-1 and C-2. On December 1, 2023, the Department approved the Company’s *2024-2026 Energy Conservation and Optimization (“ECO”) Triennial Plan (“Triennial Plan”)*.⁸⁴ Therefore for both 2024 and 2025, CIP spending was based on the currently approved budget for 2024 of \$56,731,213 and the 2024 Minnesota Efficient Technology Accelerator budget of \$1,121,321,⁸⁵ except for January through March in 2024, which reflect actual spending, and the currently approved budget for 2025 of \$60,027,102 and the 2025 Minnesota Efficient Technology

⁸² *In the Matter of CenterPoint Energy’s 2022 Conservation Improvement Program (CIP) Cost Recovery*, Docket No. G-008/M-23-182, Ordering Point 3 (Sept. 5, 2023).

⁸³ *In the Matter of a Petition by CenterPoint Energy for Approval of its 2009 CIP Tracker Account and DSM Financial Incentive*, Docket No. G-008/M-10-416, G-008/M-10-634, Ordering Point 4 (Oct. 11, 2010).

⁸⁴ *In the Matter of CenterPoint Energy’s 2024-2026 Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-23-95 et al., Deputy Commissioner Decision (Dec. 1, 2023). See the final version of the *2024-2026 ECO Plan* filed on January 26, 2024, as a *Compliance Filing*.

⁸⁵ *In the Matter of Compliance Filing for the Minnesota Efficient Technology Accelerator*, Docket No. G-008/CIP-23-95, (Dec. 21, 2023).

Accelerator estimated budget of \$2,084,884. Sales volumes for 2024-2025 are taken from the 2023 rate case,⁸⁶ again, except for January through March of 2024, which reflect actual volumes. The projections use the interim CCRC (\$0.3204 per Dth), from the 2023 rate case,⁸⁷ which is in effect as of January 1, 2024. The Company calculated carrying charges using the settlement short-term debt interest factor (0.39%) from the Company's 2021 rate case for the rest of 2023 and 2024.⁸⁸

In the Company's projections for 2024, it is assumed the Company will receive the Financial Incentive requested in this filing. In the Company's projections for 2025, it is assumed the Company will receive a Financial Incentive determined by applying the mechanism approved by the Commission for the *Triennial Plan* to the Company's estimated net benefits for 2024.^{89 90}

The mechanism for the 2024-2026 triennium caps the Financial Incentive that a utility is eligible for to a specified percent of the utility's CIP net program benefits based on the Minnesota test. The Company's 2025 projections (i.e., 2024 ECO performance) reflect an incentive of 4.0 percent of its estimated 2024 program net benefits of \$66,286,189. The incentive was rounded to \$6,600,000 for use in projections. The Company realizes the incentives may differ from these estimates depending on the performance of the Company's ECO portfolio in 2024, but the Company believes that assuming a financial incentive based on 4.0 percent of estimated net benefits for the 2024 plan is the best way calculate the 2024 financial incentive in 2025.⁹¹

All the projections referenced here are included in the Attachments Section of this filing.

Projection Results and Proposal

Projections for 2024 and 2025 (Attachments C-1 and C-2) show that an increase in the CCRA to \$0.1704 per Dth taking effect on October 1, 2024, and remaining in effect through 2025 would achieve a near-zero CIP Tracker balance by the end of 2025.

⁸⁶ *In the Matter of the Application by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G-008/GR-23-173, Schedules 10 and 13 (Sept. 27, 2023).

⁸⁷ *In the Matter of the Application by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G-008/GR-23-173, Compliance Filing (Jan. 2, 2024).

⁸⁸ As approved by the Commission in *In the Matter of the Application by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas (CPE) for Authority to Increase Natural Gas Utility Service in Minnesota*, Docket No. G-008/GR-21-435, Order (Mar. 23, 2022).

⁸⁹ *In the Matter of Commission Review of Utility Performance Incentives for Energy Conservation*, Docket No. E,G-999/CI-08-133, Order Adopting Modifications to Shared Savings Demand-side Management Financial Incentive Plan (Jan. 25, 2024).

⁹⁰ *In the Matter of CenterPoint Energy's 2024-2026 Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-23-95 et al., Deputy Commissioner Decision (Dec. 1, 2023).

⁹¹ The projections show the financial incentives for each year in October. On an actual basis, the CIP Tracker will incorporate the incentive when it is approved by Commission Order.

CenterPoint Energy has in the past proposed to make modifications to the CCRA on October 1 of the year following the proposal and in prior years the Commission approved a CCRA modification for October 1.⁹² The Company proposes to increase the CCRA to \$0.1704 per Dth effective October 1, 2024.

A revised proposed tariff page (based on approved tariffs) is included as Attachment E to this filing, and the Company proposes the following bill message:

The PUC has approved a Conservation Cost Recovery Adjustment (CCRA) factor of \$0.01704 per therm. This charge will be used to fund energy conservation activities and has been added to your delivery charge. For more information, please call or visit our website.

As approved in 2023,⁹³ a phone number and website address are not included in this bill message. If a customer has questions, the phone number and website address they should contact already appears near the bill message on the customer's bill.

⁹² *In the Matter of CenterPoint Energy's 2022 Conservation Improvement Program (CIP) Cost Recovery*, Docket No. G-008/M-23-182, Ordering Point 3 (Sept. 5, 2023).

⁹³ See *Id.* 92, Ordering Point 4.

SECTION 5: ATTACHMENTS

Attachment A: DSM Financial Incentive Mechanism – 2023 Financial Incentive Calculations

Attachment B: Total Program Cost-Benefit Analysis without the Low-Income Segment

Attachment C-1: CIP Tracker and Balance Projections for 2024 with New CCRA Starting in October 2024

Attachment C-2: CIP Tracker and Balance Projections for 2025 with New CCRA Starting in October 2024

Attachment D: Detailed Energy Savings Information for Projects with Deemed Savings Measures

Attachment E: Revised Tariff Page

Attachment A: DSM Financial Incentive Mechanism – 2023 Financial Incentive Calculations

The following pages contain the worksheet used to calculate the requested 2023 Financial Incentive taken from the spreadsheet provided by the Minnesota Department of Commerce.

2023

CenterPoint Energy

Inputs	
2017 Weather-Normalized Sales (Dth)	144,773,124
2018 Weather-Normalized Sales (Dth)	148,027,024
2019 Weather-Normalized Sales (Dth)	152,839,181
3-year Weather-Normalized Sales Average (Dth)	148,546,443
1.0% Energy Savings	1,485,464
Increase Energy Savings per 0.1% Increase in Achievement Level	148,546
Approved CIP Budget	\$41,281,365
Approved CIP Energy Savings Goal (Dth)	1,908,242
Estimated Net Benefits at Energy Savings Goal	\$67,356,247
Energy savings at 1.5% (Dth)	2,228,197
Incentive Calibration	
Max Percent of Net Benefits Awarded	10.0%
Max Percent of Expenditures Awarded	30.0%
Earning Threshold	0.7%
Achievement Level Where Net Benefits Cap Begins	1.2%
Increase in Net Benefits Awarded Per 0.1% Increase in Achievement Level	7.5
Actual 2023 Achievements	
Expenditures	\$41,484,184
Energy Saved (first year Dth saved)	2,009,051
Net Benefits Achieved	\$84,506,619
Shared Savings Incentive Results	
Achievement Level	1.35%
Percent of Net Benefits Awarded	10.0000%
Financial Incentive Award	\$8,450,662
Incentive/First Year Dth Saved \$	\$4.2063
Incentive/Net Benefits	10.00%
Incentive/CIP Expenditures	20.37%

Estimated Incentive Levels by Achievement Level

Achievement Level (% of sales)	Energy Saved	Percent of Net Benefits Awarded	Estimated Net Benefits Achieved	Incentive Award	Average Incentive per unit Saved	Incremental Incentive Units Saved
0.0%	0	0.00%	\$0	\$0	\$0.000	-
0.1%	148,546	0.00%	\$5,243,323	\$0	\$0.000	\$0.000
0.2%	297,093	0.00%	\$10,486,646	\$0	\$0.000	\$0.000
0.3%	445,639	0.00%	\$15,729,969	\$0	\$0.000	\$0.000
0.4%	594,186	0.00%	\$20,973,292	\$0	\$0.000	\$0.000
0.5%	742,732	0.00%	\$26,216,615	\$0	\$0.000	\$0.000
0.6%	891,279	0.00%	\$31,459,938	\$0	\$0.000	\$0.000
0.7%	1,039,825	6.25%	\$36,703,261	\$2,293,954	\$2.206	\$15.443
0.8%	1,188,372	7.00%	\$41,946,584	\$2,936,261	\$2.471	\$4.324
0.9%	1,336,918	7.75%	\$47,189,907	\$3,657,218	\$2.736	\$4.853
1.0%	1,485,464	8.50%	\$52,433,230	\$4,456,825	\$3.000	\$5.383
1.1%	1,634,011	9.25%	\$57,676,554	\$5,335,081	\$3.265	\$5.912
1.2%	1,782,557	10.00%	\$62,919,877	\$6,291,988	\$3.530	\$6.442
1.3%	1,931,104	10.00%	\$68,163,200	\$6,816,320	\$3.530	\$3.530
1.4%	2,079,650	10.00%	\$73,406,523	\$7,340,652	\$3.530	\$3.530
1.5%	2,228,197	10.00%	\$78,649,846	\$7,864,985	\$3.530	\$3.530
1.6%	2,376,743	10.00%	\$83,893,169	\$8,389,317	\$3.530	\$3.530
1.7%	2,525,290	10.00%	\$89,136,492	\$8,913,649	\$3.530	\$3.530
1.8%	2,673,836	10.00%	\$94,379,815	\$9,437,981	\$3.530	\$3.530
1.9%	2,822,382	10.00%	\$99,623,138	\$9,962,314	\$3.530	\$3.530
2.0%	2,970,929	10.00%	\$104,866,461	\$10,486,646	\$3.530	\$3.530
2.1%	3,119,475	10.00%	\$110,109,784	\$11,010,978	\$3.530	\$3.530
2.2%	3,268,022	10.00%	\$115,353,107	\$11,535,311	\$3.530	\$3.530
2.3%	3,416,568	10.00%	\$120,596,430	\$12,059,643	\$3.530	\$3.530
2.4%	3,565,115	10.00%	\$125,839,753	\$12,583,975	\$3.530	\$3.530
2.5%	3,713,661	10.00%	\$131,083,076	\$13,108,308	\$3.530	\$3.530
2.6%	3,862,208	10.00%	\$136,326,399	\$13,632,640	\$3.530	\$3.530
2.7%	4,010,754	10.00%	\$141,569,722	\$14,156,972	\$3.530	\$3.530
2.8%	4,159,300	10.00%	\$146,813,045	\$14,681,305	\$3.530	\$3.530
2.9%	4,307,847	10.00%	\$152,056,368	\$15,205,637	\$3.530	\$3.530
3.0%	4,456,393	10.00%	\$157,299,691	\$15,729,969	\$3.530	\$3.530

Attachment B: Total Program Cost-Benefit Analysis without the Low-Income Segment

The BenCosts provided below include the cost-benefit analyses for the Company's total 2023 CIP goals and actual results excluding cost-ineffective low-income programs.¹

Conservation Improvement Program (CIP)

BENEFIT COST FOR GAS CIPS-- Cost-Effectiveness Analysis

Company: CenterPoint Energy
Project: CenterPoint Energy CIP 2023 Total Actual
(Full Behavioral Savings)

Input Data		First Year	Second Year	Third Year
1) Retail Rate (\$/MCF) =	\$6.21			
Escalation Rate =	4.69%			
2) Non-Gas Fuel Retail Rate (\$/Fuel Unit) =	\$0.000			
Escalation Rate =	3.59%			
Non-Gas Fuel Units (ie. kWh, Gallons, etc) =	kWh			
3) Commodity Cost (\$/MCF) =	\$3.25			
Escalation Rate =	4.69%			
4) Demand Cost (\$/Unit/Yr) =	\$115.55			
Escalation Rate =	4.69%			
5) Peak Reduction Factor =	1.00%			
6) Variable O&M (\$/MCF) =	\$0.0500			
Escalation Rate =	4.69%			
7) Non-Gas Fuel Cost (\$/Fuel Unit) =	\$0.000			
Escalation Rate =	3.59%			
8) Non-Gas Fuel Loss Factor	7.70%			
9) Gas Environmental Damage Factor =	\$2.0700			
Escalation Rate =	2.30%			
10) Non Gas Fuel Enviro. Damage Factor (\$/Unit) =	\$0.0198			
Escalation Rate =	2.30%			
11) Participant Discount Rate =	3.02%			
12) Utility Discount Rate =	5.39%			
13) Societal Discount Rate =	3.02%			
14) General Input Data Year =	2020			
15a) Project Analysis Year 1 =	2021			
15b) Project Analysis Year 2 =	2022			
15c) Project Analysis Year 3 =	2023			
16) Utility Project Costs				
16 a) Administrative & Operating Costs =			\$	17,074,233
16 b) Incentive Costs =			\$	18,015,586
16 c) Total Utility Project Costs =		\$ -	\$ -	\$ 35,089,819
17) Direct Participant Costs (\$/Part.) =				182.60
18) Participant Non-Energy Costs (Annual \$/Part.) =				-
Escalation Rate =		2.16%	2.16%	2.16%
19) Participant Non-Energy Savings (Annual \$/Part.) =				-
Escalation Rate =		2.16%	2.16%	2.16%
20) Project Life (Years) =				11.647
21) Avg. MCF/Part. Saved =		#DIV/0!	#DIV/0!	7.010
22) Avg Non-Gas Fuel Units/Part. Saved =		0 kWh	0 kWh	0 kWh
22a) Avg Additional Non-Gas Fuel Units/ Part. Used =		0 kWh	0 kWh	0 kWh
23) Number of Participants =				310,965
24) Total Annual MCF Saved =				2,179,903
25) Incentive/Participant =		#DIV/0!	#DIV/0!	\$57.93

Cost Summary	1st Yr	2nd Yr	3rd Yr	Test Results	Triennial NPV	Triennial B/C
Utility Cost per Participant =	#DIV/0!	#DIV/0!	112.84	Ratepayer Impact Measure Test	(\$77,185,120)	0.60
Cost per Participant per MCF =	#DIV/0!	#DIV/0!	42.1446846	Utility Cost Test	\$84,506,619	3.67
Lifetime Energy Reduction (MCF)	26,158,838			Societal Test	\$120,850,973	2.74
Societal Cost per MCF	2.660251787			Participant Test	\$155,484,435	3.91

¹ Behavioral energy savings are reported consistent with *In the Matter of Inclusion of Behavioral Project Savings in Energy Conservation Improvement Programs and Shared Savings Demand-Side Management Financial Incentive Calculations*, Docket No. E,G-999/CI-08-133, et al., Deputy Commissioner Decision (DOC, Apr. 26, 2012). In accordance with the Average Savings Method, the full savings for behavioral programs are used for BenCost analyses; reduced savings are used elsewhere in the report. Alternative CIP project and CIP assessments are excluded from spending used in all BenCost modeling.

Attachment C-1: CIP Tracker and Balance Projection for 2024 with New CCRA Starting in October 2024

CenterPoint Energy Minnesota Gas

CIP Tracker and Balance

2024 Forecast with New CCRA starting Oct 2024

2024 Forecast using 2023 rate case volumes for Apr-Dec (Docket No. G-008/GR-23-173). Actuals for Jan-Mar.

CCRC interim rate approved in the 2023 rate case (Docket No. G-008/GR-23-173)

Approved CCRA rate (Jan-Sept) of \$0.0926/Dth (Docket No. G-008/M-23-182)

CCRA (Oct-Dec) determined by 2025 year-end goal-seek to zero

	Jan 24 Actual	Feb 24 Actual	Mar 24 Actual	Apr 24 Forecast	May 24 Forecast	June 24 Forecast	July 24 Forecast	Aug 24 Forecast	Sept 24 Forecast	Oct 24 Forecast	Nov 24 Forecast	Dec 24 Forecast	Annual Summary	
Expenses														
1	Beginning Tracker Balance (\$) - Under / (Over) Recovered	6,131,707	2,334,099	(4,131,882)	(9,304,036)	(10,895,302)	(11,377,435)	(9,393,333)	(6,275,158)	(4,644,038)	(2,094,835)	8,226,659	7,634,709	6,131,707
2	CIP Program Expenditures	4,294,824	2,783,473	1,674,071	4,881,078	3,597,091	4,216,160	4,891,928	3,425,226	4,340,704	4,922,669	5,246,016	13,579,293	57,852,534
3	Performance Incentive	-	-	-	-	-	-	-	-	-	8,450,662	-	-	8,450,662
4	Total Expenses & Incentive (Line 1 + Line 2 + Line 3)	10,426,531	5,117,572	(2,457,811)	(4,422,958)	(7,298,211)	(7,161,275)	(4,501,405)	(2,849,931)	(303,334)	11,278,496	13,472,676	21,214,002	72,434,903
Recovery														
5	Total Volumes (Dt)	24,695,471	26,747,567	20,352,420	18,003,769	12,088,089	8,166,058	7,683,108	7,814,847	7,275,372	9,449,335	13,896,100	21,966,580	178,138,715
6	Exemptions (Dt)	4,173,173	4,354,289	3,780,997	2,338,519	2,217,587	2,767,001	3,392,008	3,473,549	2,938,958	3,227,532	1,997,866	2,336,438	36,997,918
7	Volumes less Exemptions (Dt) (Line 5 - Line 6)	20,522,297	22,393,278	16,571,423	15,665,250	9,870,502	5,399,057	4,291,100	4,341,298	4,336,414	6,221,803	11,898,234	19,630,141	141,140,796
8	Interim Rate Recovery (CCRC) (per Dt)	0.3204	0.3204	0.3204	0.3204	0.3204	0.3204	0.3204	0.3204	0.3204	0.3204	0.3204	0.3204	
9	Adjustment for interim CCRC rate implementation	382,814	-	-	-	-	-	-	-	-	-	-	-	382,814
10	CCRC Recovery (\$) (Line 7 x Line 8 + Line 9)	(6,192,530)	(7,174,806)	(5,309,484)	(5,019,146)	(3,162,509)	(1,729,858)	(1,374,869)	(1,390,952)	(1,389,387)	(1,993,466)	(3,812,194)	(6,289,497)	(44,838,697)
11	CCRA (per Dt)	0.0926	0.0926	0.0926	0.0926	0.0926	0.0926	0.0926	0.0926	0.0926	0.1704	0.1704	0.1704	
12	Base CCRA Recovery (\$) (Line 7 x Line 11)	(1,900,365)	(2,073,618)	(1,534,514)	(1,450,602)	(914,008)	(499,953)	(397,356)	(402,004)	(401,552)	(1,060,195)	(2,027,459)	(3,344,976)	(16,006,602)
13	Total Recovery (Line 10 + Line 12)	(8,092,895)	(9,248,424)	(6,843,998)	(6,469,748)	(4,076,517)	(2,229,810)	(1,772,224)	(1,792,956)	(1,790,939)	(3,053,661)	(5,839,653)	(9,634,473)	(60,845,299)
Carrying Charges														
14	Sub-Balance (\$) (Line 4 + Line 13)	2,333,636	(4,130,851)	(9,301,809)	(10,892,707)	(11,374,728)	(9,391,085)	(6,273,630)	(4,642,887)	(2,094,273)	8,224,835	7,633,022	11,579,529	11,589,604
15	Deferred Income Tax ((Line 14 - Line 1) x 28.742%)	1,091,641	1,858,156	1,485,940	456,616	137,797	(570,917)	(896,665)	(469,147)	(732,853)	(2,966,080)	170,623	(1,133,820)	
16	ADIT (Line 15 + Line 16 prior month)	(906,353)	951,803	2,437,744	2,894,359	3,032,156	2,461,239	1,564,574	1,095,427	362,573	(2,603,506)	(2,432,883)	(3,566,703)	
17	Net Investment (Line 14 + Line 16)	1,427,283	(3,179,048)	(6,864,066)	(7,998,348)	(8,342,572)	(6,929,846)	(4,709,055)	(3,547,460)	(1,731,700)	5,621,329	5,200,139	8,012,826	
18	Carrying Charge Rate	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	
19	Carrying Charge (Line 17 x Line 18)	463	(1,031)	(2,227)	(2,595)	(2,707)	(2,248)	(1,528)	(1,151)	(562)	1,824	1,687	2,600	(7,475)
20	Ending Tracker Balance - Under / (Over) Recovered (Line 14 + Line 19)	2,334,099	(4,131,882)	(9,304,036)	(10,895,302)	(11,377,435)	(9,393,333)	(6,275,158)	(4,644,038)	(2,094,835)	8,226,659	7,634,709	11,582,129	11,582,129

**Attachment C-2: CIP Tracker and Balance Projection for 2025 with New
CCRA Starting in October 2024**

CenterPoint Energy Minnesota Gas

CIP Tracker and Balance

2025 Forecast with New CCRA starting Oct 2024

2025 Forecast using 2023 rate case volumes (Docket No. G-008/GR-23-173)

CCRC interim rate approved in the 2023 rate case (Docket No. G-008/GR-23-173)

CCRA determined by 2025 year-end goal-seek to zero

	Jan 25 Forecast	Feb 25 Forecast	Mar 25 Forecast	Apr 25 Forecast	May 25 Forecast	June 25 Forecast	July 25 Forecast	Aug 25 Forecast	Sept 25 Forecast	Oct 25 Forecast	Nov 25 Forecast	Dec 25 Forecast	Annual Summary	
Expenses														
1	Beginning Tracker Balance (\$) - Under / (Over) Recovered	11,582,129	(2,882,490)	(12,111,392)	(17,804,590)	(20,533,031)	(21,716,948)	(19,910,137)	(16,808,971)	(15,338,847)	(12,877,318)	(4,152,007)	(4,594,002)	11,582,129
2	CIP Program Expenditures	(997,501)	3,915,891	5,986,947	5,289,306	3,897,933	4,568,778	5,301,064	3,711,695	4,703,738	5,334,376	5,684,766	14,714,995	62,111,986
3	Performance Incentive	-	-	-	-	-	-	-	-	-	6,600,000	-	-	6,600,000
4	Total Expenses & Incentive (Line 1 + Line 2 + Line 3)	10,584,628	1,033,401	(6,124,444)	(12,515,285)	(16,635,097)	(17,148,171)	(14,609,073)	(13,097,276)	(10,635,110)	(942,942)	1,532,758	10,120,993	80,294,115
Recovery														
5	Total Volumes (Dt)	29,685,885	28,385,943	25,145,090	18,016,318	12,150,579	8,161,810	7,688,496	7,852,234	7,320,004	9,504,239	13,983,031	22,145,089	190,038,717
6	Exemptions (Dt)	3,338,056	2,672,936	2,300,334	2,338,519	2,217,587	2,767,001	3,392,008	3,473,549	2,938,958	3,227,532	1,997,866	2,336,438	33,000,785
7	Volumes less Exemptions (Dt) (Line 5 - Line 6)	26,347,829	25,713,007	22,844,755	15,677,800	9,932,992	5,394,808	4,296,488	4,378,685	4,381,046	6,276,707	11,985,165	19,808,650	157,037,932
8	Base Interim Rate Recovery (CCRC) (per Dt)	0.3407	0.3407	0.3407	0.3407	0.3407	0.3407	0.3407	0.3407	0.3407	0.3407	0.3407	0.3407	
9	Base Rate Cost Recovery (\$) (Line 7 x Line 8)	(8,976,705)	(8,760,421)	(7,783,208)	(5,341,426)	(3,384,171)	(1,838,011)	(1,463,813)	(1,491,818)	(1,492,622)	(2,138,474)	(4,083,346)	(6,748,807)	(53,502,822)
10	CCRA (per Dt)	0.1704	0.1704	0.1704	0.1704	0.1704	0.1704	0.1704	0.1704	0.1704	0.1704	0.1704	0.1704	
11	CCRA Recovery (\$) (Line 7 x Line 10)	(4,489,670)	(4,381,496)	(3,892,746)	(2,671,497)	(1,692,582)	(919,275)	(732,121)	(746,128)	(746,530)	(1,069,551)	(2,042,272)	(3,375,394)	(26,759,262)
12	Total Recovery (Line 9 + Line 11)	(13,466,375)	(13,141,917)	(11,675,954)	(8,012,923)	(5,076,753)	(2,757,286)	(2,195,934)	(2,237,946)	(2,239,152)	(3,208,025)	(6,125,618)	(10,124,201)	(80,262,084)
Carrying Charges														
13	Sub-Balance (\$) (Line 4 + Line 12)	(2,881,747)	(12,108,516)	(17,800,398)	(20,528,208)	(21,711,850)	(19,905,457)	(16,805,007)	(15,335,222)	(12,874,262)	(4,150,967)	(4,592,860)	(3,208)	32,031
14	Deferred Income Tax ((Line 13 - Line 1) x 28.742%)	4,157,207	2,651,744	1,635,134	782,822	338,816	(520,659)	(892,476)	(423,585)	(708,371)	(2,508,128)	126,710	(1,319,486)	
15	ADIT (Line 14 + Line 15 prior month)	590,504	3,242,248	4,877,383	5,660,205	5,999,021	5,478,362	4,585,886	4,162,301	3,453,930	945,802	1,072,512	(246,974)	
16	Net Investment (Line 13 + Line 15)	(2,291,243)	(8,866,267)	(12,923,016)	(14,868,003)	(15,712,829)	(14,427,095)	(12,219,121)	(11,172,922)	(9,420,332)	(3,205,165)	(3,520,348)	(250,182)	
17	Carrying Charge Rate	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	
18	Carrying Charge (Line 16 x Line 17)	(743)	(2,876)	(4,192)	(4,823)	(5,098)	(4,680)	(3,964)	(3,625)	(3,056)	(1,040)	(1,142)	(81)	(35,320)
19	Ending Tracker Balance - Under / (Over) Recovered (Line 13 + Line 18)	(2,882,490)	(12,111,392)	(17,804,590)	(20,533,031)	(21,716,948)	(19,910,137)	(16,808,971)	(15,338,847)	(12,877,318)	(4,152,007)	(4,594,002)	(3,289)	(3,289)

Attachment D: Detailed Energy Savings Information for Projects with Deemed Savings Measures

This attachment provides additional information about certain measures rebated in 2023. Where the savings Dth/unit for a measure is listed as N/A, the Company does not claim a deemed savings amount for that measure. For example, for residential insulation measures, such as air sealing, the Company claims energy savings on the basis of the change in R-value observed at the participating home. Similarly, the Company claims “deemed calculated” energy savings for many commercial measures; This means that the Company uses a formula to calculate energy savings on the basis of certain customer-provided inputs. For example, the energy savings claimed for a process boiler depends on the boiler’s efficiency and British thermal unit (“Btu”) per hour input as provided by the customer.

Project and Measure Name	Quantity	Measure Life	Participant Cost	Savings Dth/Unit	Total Dth Savings
Residential Market Segment					
Home Efficiency Rebates					
92% AFUE furnace	295	20	\$637	13.59	4,010
94% AFUE furnace	681	20	\$736	16.62	11,320
96% AFUE furnace	15,072	20	\$950	20.38	307,111
85% efficient boiler	8	20	\$578	1.83	15
91% efficient boiler	582	20	\$2,017	24.46	14,236
High-efficiency single package vertical unit	0	20	\$400	5.01	0
Tier 1 thermostat replacing manual	2,137	10	\$30	2.48	5,308
Tier 2 thermostat replacing manual	67	10	\$91	3.73	250
Tier 2 thermostat replacing tier 1	70	10	\$61	1.24	87
Tier 3 thermostat replacing manual	1,182	10	\$189	7.52	8,890
Tier 3 thermostat replacing tier 1	1,283	10	\$159	5.04	6,462
Tier 3 thermostat replacing tier 2	795	10	\$98	3.80	3,017
Tier 2 thermostat replacing unknown	147	10	\$130	3.73	548
Tier 3 thermostat replacing unknown	2,765	10	\$174	3.80	10,493
Hearth with electronic ignition	989	15	\$193	4.38	4,335
.64 UEF tank water heater (atmospheric)	30	15	\$88	2.06	62
.64 UEF tank water heater (power vent)	2,242	15	\$577	1.57	3,516
.68 UEF tank water heater (>55 Gallons, <75,000 Btu/hr)	0	15	\$814	0.00	0
88% thermal efficiency water heater (>75,000 Btu/hr, commercial water heater in residential application)	1	11	\$1,350	11.72	12
Indirect water heater	30	15	\$989	4.47	134

.87 UEF tankless water heater (replacing tank water heater)	693	20	\$1,097	5.89	4,082
.87 UEF tankless water heater (replacing tankless water heater)	66	20	\$400	1.97	130
Combo unit (.87 UEF tankless water heater + air handling unit)	0	20	\$1,833	22.67	0
ENERGY STAR clothes dryer	348	12	\$152	0.39	136
DIY Home Efficiency					
Low-flow (1.5 GPM) showerhead	6,629	10	N/A	1.46	9,695
Low-flow (1.5 GPM) kitchen aerator	3,265	10	N/A	0.35	1,134
Low-flow (0.5) bathroom aerator	5,490	10	N/A	0.30	1,665
6' feet of R-2 (at least) DHW pipe insulation	3,403	13	N/A	1.22	4,156
Rope caulk	632	1	N/A	0.10	60
EDPM weatherstripping	347	1	N/A	0.10	33
Outlet and switch gaskets	212	1	N/A	0.10	20
Window film	756	1	N/A	0.10	72
Water heater temperature card	3,272	2	N/A	0.21	702
Home Energy Squad					
Low-flow (1.5 GPM) showerhead	2,733	10	N/A	1.76	4,816
Low-flow (1.5 GPM) kitchen faucet aerator	452	10	N/A	0.56	253
Low-flow (1.0 GPM) bathroom faucet aerator	0	10	N/A	0.32	0
Low-flow (0.5 GPM) bathroom faucet aerator	2,229	10	N/A	0.49	1,090
Weatherstripping on doors	2,858	2	N/A	0.70	2,000
Weatherstripping on attic hatches	317	20	N/A	1.40	444
Tier 1 thermostat replacing manual	519	10	N/A	2.48	1,289
Tier 3 thermostat replacing manual	165	10	N/A	7.52	1,241
Tier 3 thermostat replacing Tier 1	433	10	N/A	5.04	2,181
Tier 3 thermostat replacing Tier 2	0	10	N/A	3.80	0
Water heater setback	1,418	2	N/A	0.86	1,217
6' feet of R-2 (at least) DHW pipe insulation	2,445	13	N/A	1.47	3,598
New Home Construction Rebates					
92% AFUE furnace	304	20	\$66	1.35	411
95% AFUE furnace	454	20	\$379	4.87	2,210
91% efficient boiler	64	20	\$2,017	22.79	1,458
High-efficiency single package vertical unit	0	20	\$400	5.01	0
Tier 2 thermostat replacing tier 1	2	10	\$61	1.24	2
Tier 3 thermostat replacing tier 1	695	10	\$159	5.04	3,501
Hearth with electronic ignition	1,913	15	\$193	4.38	8,385

.64 UEF tank water heater (power vent)	108	15	\$577	1.83	198
.68 UEF tank water heater (>55 Gallons, <75,000 Btu/hr)	0	15	\$814	0.00	0
88% thermal efficiency water heater (>75,000 Btu/hr, commercial water heater in residential application)	0	11	\$1,350	0.00	0
Indirect water heater	5	15	\$989	4.47	22
.87 UEF tankless water heater	12	20	\$400	1.92	23
Combo unit (.87 UEF tankless water heater + air handling unit)	0	20	\$779	7.06	0
ENERGY STAR clothes dryer	29	12	\$152	0.39	11
School Kits					
Low-flow (1.5 GPM) showerhead	15,000	10	N/A	0.48	7,149
Low-flow (1.5 GPM) kitchen faucet aerator	15,000	10	N/A	0.12	1,851
Low-flow (0.5 PGM) bathroom faucet aerator	15,000	10	N/A	0.12	1,774
Water heater setback	15,000	2	N/A	0.37	5,591
Low Income Market Segment					
Low Income Weatherization					
Weatherization	359	20	N/A	26.38	9,472
92% AFUE furnace	0	20	N/A	13.43	0
94% AFUE furnace	1	20	N/A	16.75	17
96% AFUE furnace	153	20	N/A	20.34	3,112
85% efficient boiler	1	20	N/A	1.77	2
91% efficient boiler	24	20	N/A	21.82	524
Tier 1 thermostat replacing manual	93	10	N/A	2.48	231
.64/.68 UEF tank water heater (atmospheric)	0	15	N/A	1.65	0
.64/.68 UEF tank water heater (power vent)	108	15	N/A	1.65	178
Indirect water heater	0	15	N/A	4.47	0
.87 UEF tankless water heater (replacing tank water heater)	1	20	N/A	4.85	5
.87 UEF tankless water heater (replacing tankless water heater)	0	20	N/A	0.94	0
Combi Units (.87 UEF tankless water heater + air handling unit)	1	20	N/A	22.67	23
Furnace tune-up	52	2	N/A	2.11	110
Boiler tune-up	4	2	N/A	3.03	12
Pipe Wrap	216	13	N/A	1.47	318
Water Heater Blankets	3	13	N/A	1.07	3
Pre-Weatherization	48	N/A	N/A	N/A	N/A

Low-Income Rental Efficiency					
Weatherization	25	20	N/A	18.96	474
92% AFUE Furnace	0	20	N/A	13.43	0
94% AFUE Furnace	0	20	N/A	16.75	0
96% AFUE Furnace	13	20	N/A	20.34	264
85% efficient boiler	10	20	N/A	1.77	18
91% efficient boiler	8	20	N/A	21.82	175
Furnace Tune-up/Repair	0	2	N/A	2.11	0
Boiler Tune-up/Repair	0	2	N/A	3.03	0
Tier 1 thermostat replacing manual	1	10	N/A	2.48	2
Combi Units (.87 UEF tankless water heater + air handling unit)	0	20	N/A	22.67	0
Health & Safety	0	0	N/A	-	0
.64/.68 UEF tank water heater (atmospheric)	0	15	N/A	1.65	0
.64/.68 UEF tank water heater (power vent)	7	15	N/A	1.65	12
Indirect water heater	0	15	N/A	4.47	0
Pre-Weatherization	72	N/A	N/A	N/A	N/A
Non-Profit Affordable Housing					
92% AFUE furnace (retrofit)	1	20	\$637	13.43	13
94% AFUE furnace (retrofit)	1	20	\$736	16.75	17
96% AFUE furnace (retrofit)	23	20	\$950	20.34	468
85% efficient boiler (retrofit)	0	20	\$578	1.77	0
91% efficient boiler (retrofit)	0	20	\$2,017	21.82	0
Tier 1 thermostat (retrofit) - replacing manual	17	10	\$30	2.48	42
Tier 2 thermostat (retrofit) - replacing manual	3	10	\$91	3.73	11
Tier 3 thermostat (retrofit) - replacing manual	0	10	\$189	7.52	0
Tier 2 thermostat (retrofit) - replacing tier 1	0	10	\$61	1.24	0

Tier 3 thermostat (retrofit) - replacing tier 1	0	10	\$159	5.04	0
Tier 3 thermostat (retrofit) - replacing tier 2	0	10	\$98	3.80	0
.64/.68 UEF tank water heater (atmospheric)	0	15	\$88	1.65	0
.64/.68 UEF tank water heater (power vent)	25	15	\$577	1.65	41
Indirect water heater (retrofit)	0	15	\$989	4.47	0
.87 UEF tankless water heater (replacing tank water heater)	0	20	\$1,097	4.85	0
Heat recovery ventilator (HRV)/ energy recovery ventilator (ERV) (retrofit)	9	15	\$980	9.11	82
Air sealing (retrofit)	16	20	\$1,817	10.81	173
Attic insulation (retrofit)	13	20	\$516	6.45	84
Wall insulation (retrofit)	12	20	\$2,877	43.74	525
Sill plate/rim joist (retrofit)	21	20	\$300	3.44	72
Low-flow (1.5 GPM) showerhead (retrofit)	0	10	\$12	1.76	0
Low-flow (1.5 GPM) kitchen faucet aerator (retrofit)	7	10	\$7	0.56	4
Low-flow (1.0 GPM) bathroom faucet aerator (retrofit)	0	10	\$7	0.32	0
ENERGY STAR clothes washer (retrofit)	8	11	\$163	0.17	1
ENERGY STAR clothes dryer (retrofit)	1	12	\$152	0.39	0
92% AFUE furnace (new construction)	0	20	\$66	1.00	0
95% AFUE furnace (new construction)	10	20	\$379	5.05	51
85% efficient boiler (new construction)	0	20	\$578	1.77	0
91% efficient boiler (new construction)	2	20	\$2,017	21.82	44
Tier 2 thermostat (new construction) - replacing tier 1	7	10	\$61	1.24	9
Tier 3 thermostat (new construction) - replacing tier 1	11	10	\$159	5.04	55
.64/.68 UEF tank - atmospheric (new construction)	0	15	\$88	1.65	0
.64/.68 UEF tank - power vent (new construction)	10	15	\$577	1.65	17

Indirect water heater (new construction)	0	15	\$989	4.47	0
.87 UEF tankless (new construction) (baseline tankless water heater)	0	20	\$400	0.94	0
Heat recovery ventilator (HRV)/ energy recovery ventilator (ERV) (new construction)	22	15	\$980	9.11	200
Above code air sealing (new construction)	5	20	\$1,817	0.50	3
Above code attic insulation (new construction)	5	20	\$516	0.17	1
Above code wall insulation (new construction)	5	20	\$2,877	1.78	9
Low-flow showerhead - 1.5 gpm (new construction)	16	10	\$12	1.76	28
Low- flow kitchen aerator - 1.5 gpm (new construction)	17	10	\$7	0.56	10
Low-flow bathroom aerator - 1.0 gpm (new construction)	12	10	\$7	0.32	4
ENERGY STAR clothes washer (new construction)	20	11	\$163	0.17	3
ENERGY STAR clothes dryer (new construction)	19	12	\$152	0.39	7
Performance Pathway Rebates	30	20	\$5,615	23.65	709
Pre-Weatherization	11	N/A	N/A	N/A	N/A
Low-Income Multifamily Building Efficiency					
Low-Flow (1.5 GPM) Showerhead (DI Measure)	729	10	N/A	2.07	1,506
Low-Flow (1.5 GPM) Kitchen Faucet Aerator (DI Measure)	737	10	N/A	0.56	410
Low-Flow (0.5 GPM) Bathroom Faucet Aerator (DI Measure)	913	10	N/A	0.47	425
Hot Water Temp Adjustment (DI Measure)	0	2	N/A	25.94	0
Door Weatherization (DI Measure)	11	11	N/A	5.45	60
Low-Flow (1.5 GPM) Showerhead (Renter Kit)	0	10	N/A	2.07	0
Low-Flow (1.5 GPM) Kitchen Faucet Aerator (Renter Kit)	0	10	N/A	0.56	0
Low-Flow (1.0 GPM) Bathroom Faucet Aerator (Renter Kit)	0	10	N/A	0.30	0
Window Film (Renter Kit)	0	1	N/A	0.10	0
Commercial steam boiler	0	20	\$0	N/A	N/A
Turbulators for commercial boiler (hot water or steam)	0	20	\$0	N/A	N/A

Modulating burner replacement for commercial boiler (hot water or steam)	0	15	\$0	N/A	N/A
Stack damper for commercial boiler (hot water or steam)	0	5	\$0	N/A	N/A
Steam traps	2	6	\$240	308.53	617
Commercial water heater non-GAMA rated (88%+ thermal efficiency)	20	11	\$27,000	21.05	421
C&I high-efficiency hot water boiler (85% - 87.9% efficient); 100,000 - 12.5 million btu	0	20	\$0	N/A	N/A
C&I condensing efficiency hot water boiler (88%+ efficient); 100,000 - 12.5 million btu	11	20	\$106,909	62.32	685
Boiler tune-up	47	2	\$25,380	21.89	1,029
Boiler reset control	1	5	\$600	16.71	17
Boiler cutout control	0	5	\$0	N/A	N/A
Linkageless controls	0	15	\$0	N/A	N/A
CO garage sensors	9	15	\$9,054	97.13	874
Condensing unit heater	0	12	\$0	N/A	N/A
Infrared heaters	0	15	\$0	N/A	N/A
92% AFUE furnace	5	20	\$6,710	12.32	62
94% AFUE furnace	0	20	\$0	N/A	N/A
96% AFUE furnace	6	20	\$9,102	15.66	94
Commercial DCV - Retrofit	374	15	\$292,842	5.01	1,874
Process boiler	0	20	\$0	N/A	N/A
Stack economizer - process, conventional	0	15	\$0	N/A	N/A
Stack economizer - process, condensing	0	15	\$0	N/A	N/A
High-efficiency single package vertical unit	0	20	\$0	N/A	N/A
.64 UEF Tank Water Heater (<55 gallons; atmospheric)	0	11	\$0	N/A	N/A
.64 UEF Tank Water Heater (<55 gallons; power vent)	0	11	\$0	N/A	N/A
Industrial boiler/burner tune-up	0	2	\$0	N/A	N/A
Commercial pipe insulation - hydronic heat	0	15	\$0	N/A	N/A
Commercial pipe insulation - low pressure steam heat	0	15	\$0	N/A	N/A
Commercial pipe insulation - high pressure steam heat	0	15	\$0	N/A	N/A
Commercial pipe insulation - domestic hot water	0	15	\$0	N/A	N/A

Air curtains	0	15	\$0	N/A	N/A
Ozone/low temperature laundry	0	10	\$0	N/A	N/A
Green garage door hinge	0	20	\$0	N/A	N/A
Modulating clothes dryer	0	14	\$0	N/A	N/A
Hearth with electronic ignition	0	15	\$0	N/A	N/A
Smart thermostats	0	10	\$0	N/A	N/A
AC Covers	0	10	\$0	N/A	N/A
Combi oven (CEW or ENERGY STAR®)	0	12	\$0	N/A	N/A
Charbroilers - infrared	0	12	\$0	N/A	N/A
C&I Market Segment					
Foodservice					
Broilers - infrared, upright	0	12	\$4,413	N/A*	0
Charbroilers - infrared	1	12	\$2,173	N/A*	95
Combi oven	4	12	\$3,822	290.61	1,162
Combi oven (CEW or ENERGY STAR®)	108	12	\$7,183	402.70	43,492
Convection oven	78	12	\$1,286	36.10	2,816
Conveyor broiler	0	12	\$3,146	N/A	0
Conveyor oven	0	12	\$2,230	N/A	0
Demand control ventilation - kitchen hood	36	15	\$10,603	94.86	3,415
Dishwasher - ENERGY STAR®, single, door, high temp	6	15	\$770	N/A*	177
Dishwasher - ENERGY STAR®, single, conveyor, high temp	3	20	\$970	N/A*	54
Dishwasher - ENERGY STAR®, multi, conveyor, high temp	0	20	\$2,050	N/A*	0
Fryer - 50%	1	12	\$1,017	70.70	71
Fryer - 51-59%	42	12	\$1,017	78.36	3,291
Fryer - ≥60%	7	12	\$2,979	81.10	568
Griddle	3	12	\$571	37.93	114
Pasta cooker	10	12	\$2,413	N/A*	1,118
Rotating rack oven	8	12	\$4,128	211.34	1,691
Rotisserie oven	0	12	\$2,665	N/A*	0
Salamander broiler	4	12	\$1,006	N/A*	141
Steamer equipment	4	12	\$2,901	370.70	1,483
C&I Heating and Water Heating					
Commercial steam boiler	4	20	\$8,264	N/A*	3,633
Turbulators for commercial boiler (hot water or steam)	8	20	\$1,375	N/A*	2,662
Modulating burner replacement for commercial boiler (hot water or steam)	16	15	\$22,408	N/A*	3,971

Stack damper for commercial boiler (hot water or steam)	5	5	\$3,609	N/A*	133
Steam traps	2,540	6	\$120	N/A*	272,576
Commercial water heater non-GAMA rated (88%+ thermal efficiency)	141	11	\$1,350	N/A*	5,390
C&I high-efficiency hot water boiler (85% - 87.9% efficient); 100,000 - 12.5 million btu	3	20	\$2,757	N/A*	491
C&I condensing efficiency hot water boiler (88%+ efficient); 100,000 - 12.5 million btu	152	20	\$9,719	N/A*	46,900
Boiler tune-up	1,094	2	\$540	N/A*	99,129
Boiler reset control	11	5	\$600	N/A*	679
Boiler cutout control	7	5	\$141	N/A*	267
Linkageless controls	3	15	\$11,337	N/A*	1,247
CO garage sensors	26	15	\$1,006	N/A*	2,525
Condensing unit heater	22	12	\$676	N/A*	835
Infrared heaters	19	15	\$1,716	N/A*	784
92% AFUE furnace	68	20	\$1,342	N/A*	869
94% AFUE furnace	26	20	\$1,429	N/A*	536
96% AFUE furnace	251	20	\$1,517	N/A*	5,697
Commercial DCV - Retrofit	13	15	\$783	N/A*	609
Process boiler	8	20	\$16,871	N/A*	3,190
Stack economizer - process, conventional	7	15	\$31,403	N/A*	5,403
Stack economizer - process, condensing	0	15	\$46,459	N/A*	0
High-efficiency single package vertical unit	0	20	\$400	N/A	0
.64 UEF Tank Water Heater (<55 gallons; atmospheric)	1	11	\$577	N/A*	20
.64 UEF Tank Water Heater (<55 gallons; power vent)	5	11	\$577	N/A*	15
Industrial boiler/burner tune-up	119	2	\$1,809	N/A*	121,684
Commercial pipe insulation - hydronic heat	31	15	\$3,548	N/A*	1,205
Commercial pipe insulation - low pressure steam heat	2	15	\$837	N/A*	252
Commercial pipe insulation - high pressure steam heat	4	15	\$1,104	N/A*	13
Commercial pipe insulation - domestic hot water	1	15	\$881	N/A*	159
Air curtains	0	15	\$0	N/A*	0
Ozone/low temperature laundry	2	10	\$61,277	N/A*	6,973
Green garage door hinge	13	20	\$340	N/A*	218

Modulating clothes dryer	0	14	\$525	N/A*	0
Hearth with electronic ignition	57	15	\$174	N/A*	250
Smart thermostats	53	10	\$193	N/A*	365
C&I Audit Services					
Low-flow 1.0 GPM bathroom faucet aerator	0	10	N/A	1.15	0
Low-flow (0.5 GPM) bathroom faucet aerator	405	10	N/A	1.78	719
Low-flow (1.5 GPM) kitchen faucet aerator	13	10	N/A	0.57	7
Low-flow (1.5 GPM) showerhead	1,224	10	N/A	1.17	1,432
Commercial Programmable Thermostat	46	8	N/A	5.96	274
Scheduling of existing programmable thermostat	85	8	N/A	7.87	669
Commercial Weatherstripping	544	11	N/A	4.87	2,647
Hot water temp adjustment (multi-family only)	0	2	N/A	25.94	0
Multifamily					
Low-Flow (1.5 GPM) Showerhead (DI Measure)	2,402	10	N/A	2.07	4,962
Low-Flow (1.5 GPM) Kitchen Faucet Aerator (DI Measure)	1,369	10	N/A	0.56	762
Low-Flow (0.5 GPM) Bathroom Faucet Aerator (DI Measure)	2,655	10	N/A	0.47	1,236
Hot Water Temp Adjustment (DI Measure)	0	2	N/A	25.94	0
Door Weatherization (DI Measure)	31	11	N/A	5.45	169
Low-Flow (1.5 GPM) Showerhead (Renter Kit)	0	10	N/A	2.07	0
Low-Flow (1.5 GPM) Kitchen Faucet Aerator (Renter Kit)	0	10	N/A	0.56	0
Low-Flow (1.0 GPM) Bathroom Faucet Aerator (Renter Kit)	0	10	N/A	0.30	0
Window Film (Renter Kit)	0	1	N/A	0.10	0
Commercial steam boiler	0	20	\$0	N/A	N/A
Turbulators for commercial boiler (hot water or steam)	0	20	\$0	N/A	N/A
Modulating burner replacement for commercial boiler (hot water or steam)	0	15	\$0	N/A	N/A
Stack damper for commercial boiler (hot water or steam)	44	5	\$158,796	30.46	1,340
Steam traps	198	6	\$23,760	94.12	18,635
Commercial water heater non-GAMA rated (88%+ thermal efficiency)	86	11	\$116,100	31.86	2,740

C&I high-efficiency hot water boiler (85% - 87.9% efficient); 100,000 - 12.5 million btu	2	20	\$5,514	115.45	231
C&I condensing efficiency hot water boiler (88%+ efficient); 100,000 - 12.5 million btu	50	20	\$485,950	180.48	9,024
Boiler tune-up	950	2	\$513,000	23.48	22,306
Boiler reset control	31	5	\$18,600	35.36	1,096
Boiler cutout control	14	5	\$1,974	17.33	243
Linkageless controls	1	15	\$11,337	3,266.05	3,266
CO garage sensors	23	15	\$23,138	97.13	2,234
Condensing unit heater	0	12	\$0	N/A	N/A
Infrared heaters	0	15	\$0	N/A	N/A
92% AFUE furnace	58	20	\$77,836	13.81	801
94% AFUE furnace	3	20	\$4,287	13.74	41
96% AFUE furnace	60	20	\$91,020	16.90	1,014
Commercial DCV - Retrofit	235	15	\$184,005	5.01	1,177
Process boiler	0	20	\$0	N/A	N/A
Stack economizer - process, conventional	0	15	\$0	N/A	N/A
Stack economizer - process, condensing	0	15	\$0	N/A	N/A
High-efficiency single package vertical unit	0	20	\$0	N/A	N/A
.64 UEF Tank Water Heater (<55 gallons; atmospheric)	0	11	\$0	N/A	N/A
.64 UEF Tank Water Heater (<55 gallons; power vent)	0	11	\$0	N/A	N/A
Industrial boiler/burner tune-up	0	2	\$0	N/A	N/A
Commercial pipe insulation - hydronic heat	6	15	\$21,288	9.78	59
Commercial pipe insulation - low pressure steam heat	0	15	\$0	N/A	N/A
Commercial pipe insulation - high pressure steam heat	0	15	\$0	N/A	N/A
Commercial pipe insulation - domestic hot water	0	15	\$0	N/A	N/A
Air curtains	0	15	\$0	N/A	N/A
Ozone/low temperature laundry	0	10	\$0	N/A	N/A
Green garage door hinge	0	20	\$0	N/A	N/A
Modulating clothes dryer	0	14	\$0	N/A	N/A

Hearth with electronic ignition	83	15	\$14,442	4.38	364
Smart thermostats	44	10	\$8,492	49.18	2,164
AC Covers	30	10	\$1,800	0.37	11
Combi oven (CEW or ENERGY STAR®)	2	12	\$14,366	402.70	805
Charbroilers - infrared	1	12	\$2,173	23.72	24

Attachment E: Revised Tariff Page

CenterPoint Energy attaches a revised tariff page reflecting the Conservation Cost Recovery Adjustment (“CCRA”) it proposed in Section 4 of this filing. Tariff page revisions were made relative to the currently approved tariff page and not any other proposed, but unapproved tariff pages.

CONSERVATION IMPROVEMENT PROGRAM ADJUSTMENT RIDER

Applicability:

Applicable to bills for gas and/or transportation service provided under the Company's retail rate schedules.

Exemptions are as follows:

"Large Energy Facility", as defined in Minn. Stat. 216B.2421 customers shall receive a monthly exemption from conservation improvement program (CIP) charges pursuant to Minn. Stat. 216B.16, subd. 6b Energy Conservation Improvement. Upon exemption from conservation program charges, the "Large Energy Facility" customers can no longer participate in any utility's Energy Conservation Improvement Program.

"Large Customer Facility" customers that have been exempted from the Company's CIP charges pursuant to Minn. Stat. 216B.241, subd. 1a (b) shall receive a monthly exemption from CIP charges pursuant to Minn. Stat. 216B.16, subd. 6b Energy Conservation Improvement. Such monthly exemption will be effective beginning January 1 of the year following the grant of exemption. Upon exemption from the conservation program charges, the "Large Customer Facility" customers can no longer participate in CenterPoint Energy's Energy Conservation Improvement Program.

Minnesota Stat. 216B.241, subd. 1a(c) which allows exemption of certain commercial gas customers does not apply to CenterPoint Energy because the Company's customer count exceeds the 600,000 level set in statute.

Rate:

Base Charge Per Therm (CCRC)	Adjustment (CCRA)
\$0.03204	\$0.00 926 <u>1704</u>

Interim Surcharge

Effective January 1, 2024, customers' bills will be increased on an interim basis by 14.0% on the Monthly Basic Charge and the Delivery Charge per therm. Any sales tax and Franchise Fees will be calculated on the increased bill. If the total amount of the rate increase approved at the end of the Rate Case (Docket G-008/GR-23-173) is lower than the total amount of the interim rates collected, the Company will refund the difference with interest.

Rider:

A Conservation Improvement Program Adjustment which shall be included on each non-exempt customer's monthly bill. The applicable factor shall be multiplied by the customer's monthly billing in Therms for gas service before any adjustments, surcharges or sales tax.

Determination of Conservation Cost Recovery Charge (CCRC or Base Charge per Therm):

The CCRC is the amount included in base rates dedicated to the recovery of CIP costs as approved by the Minnesota Public Utilities Commission in the Company's last general rate case. The CCRC is approved and applied on a per therm basis by dividing test-year CIP expenses by the test-year sales volumes (net of CIP-exempt volumes). All revenue received from the CCRC shall be credited to the CIP tracker account.

Determination of Conservation Cost Recovery Charge (CCRA):

The Conservation Improvement Program Adjustment shall be calculated for each customer class by dividing the Recoverable Conservation Improvement Expense by the Projected Sales Volumes for a designated recovery period. The factor may be adjusted annually with the approval of the Minnesota Public Utilities Commission.

Recoverable Conservation Improvement Expense shall be the incremental Conservation Improvement Program expense not recovered through base rates as estimated for a designated period. The Program costs shall be recovered from customer classes using the current sales forecast.

Projected Sales Volumes shall be the total sales volume forecasted to be delivered to that class of customer over a budgeted 12-month period (net of CIP exempt volumes).

For each designated twelve (12) month period, an annual reconciliation will be determined based upon annual conservation costs incurred by CenterPoint Energy compared with annual conservation costs to be recovered from volumes of gas sold. The annual cost recovered is the product of the CIP charge per therm during the twelve (12) month period and the applicable gas sales volumes during the period. The difference between incurred costs and recovered costs will be used in calculating a Conservation Improvement Program Reconciliation (CIPR or CCRA) factor for each rate schedule. The CIPR (or CCRA) factor will be applied to customers' billings for the designated period and will be in effect for a twelve (12) month period, or until the Commission approves a new CCRA. Any under or over-recovery due to the CIPR factor will be included in the calculation of the CIPR factor for the following period in order to collect from or return to customers the under or over-recovered amount.

CERTIFICATE OF SERVICE

Tyler Glewwe served the above *Compliance Filing* of CenterPoint Energy to all persons at the addresses indicated on the attached list by having the document delivered by electronic filing.

/s/_____

Tyler Glewwe
Regulatory Analyst, Conservation Improvement Program
CenterPoint Energy

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	60 S 6th St Ste 1500 Minneapolis, MN 55402-4400	Electronic Service	No	OFF_SL_10-111_CI-10-111
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_10-111_CI-10-111
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	Yes	OFF_SL_10-111_CI-10-111
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_10-111_CI-10-111
Tina	Koecher	tkoecher@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_10-111_CI-10-111
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Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_10-111_CI-10-111
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_10-111_CI-10-111
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_10-111_CI-10-111

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Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	60 S 6th St Ste 1500 Minneapolis, MN 55402-4400	Electronic Service	No	OFF_SL_20-478_CIP-20-478
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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-478_CIP-20-478
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Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.	2377 Union Lake Trl Northfield, MN 55057	Electronic Service	No	OFF_SL_20-478_CIP-20-478
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Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_20-478_CIP-20-478
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Jeffrey	Haase	jhaase@grenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_20-478_CIP-20-478
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Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S Virginia, MN 55792	Electronic Service	No	OFF_SL_20-478_CIP-20-478
Deborah	Knoll	dknoll@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_20-478_CIP-20-478
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Michael	Menzel	mike.m@sagiliti.com	Sagiliti	23505 Smithtown Rd. Suite 280 Excelsior, MN 55331	Electronic Service	No	OFF_SL_20-478_CIP-20-478
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_20-478_CIP-20-478
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_20-478_CIP-20-478
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Ted	Nedwick	tnedwick@nhtinc.org	National Housing Trust	1101 30th Street NW Ste 100A Washington, DC 20007	Electronic Service	No	OFF_SL_20-478_CIP-20-478
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-478_CIP-20-478

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Audrey	Partridge	apartridge@mncee.org	Center for Energy and Environment	212 3rd Ave. N. Suite 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-478_CIP-20-478
Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_20-478_CIP-20-478
Bill	Poppert	info@technologycos.com	Technology North	2433 Highwood Ave St. Paul, MN 55119	Electronic Service	No	OFF_SL_20-478_CIP-20-478
Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024-9583	Electronic Service	No	OFF_SL_20-478_CIP-20-478
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-478_CIP-20-478
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Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-478_CIP-20-478
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Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop	211 S. Harth Ave Madison, SD 57042	Electronic Service	No	OFF_SL_20-478_CIP-20-478
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Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park	5005 Minnetonka Blvd St. Louis Park, MN 55416	Electronic Service	No	OFF_SL_20-478_CIP-20-478

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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William	Black	bblack@mmua.org	MMUA	Suite 200 3131 Fernbrook Lane North Plymouth, MN 55447	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	60 S 6th St Ste 1500 Minneapolis, MN 55402-4400	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
George	Crocker	gwillc@nawo.org	North American Water Office	5093 Keats Avenue Lake Elmo, MN 55042	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Patrick	Deal	pdeal@mnchamber.com	Minnesota Chamber of Commerce	400 Robert St N Ste 1500 Saint Paul, MN 55101	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400 Plymouth, MN 554475142	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.	7701 France Ave S Ste 600 Edina, MN 55435	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jim	Erchul	jerschul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.	823 E 7th St St. Paul, MN 55106	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.	2377 Union Lake Trl Northfield, MN 55057	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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Karolanne	Foley	Karolanne.foley@dairylandpower.com	Dairyland Power Cooperative	PO Box 817 La Crosse, WI 54602-0817	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Jeffrey	Haase	jhaase@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Patty	Hanson	phanson@rpu.org	Rochester Public Utilities	4000 E River Rd NE Rochester, MN 55906	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S Virginia, MN 55792	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Martin	Kapsch	martin.kapsch@centerpointenergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Deborah	Knoll	dknoll@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas	N/A	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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Martin	Lepak	Martin.Lepak@aeoa.org	Arrowhead Economic Opportunity	702 S 3rd Ave Virginia, MN 55792	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission	1902 6th Ave E Hibbing, MN 55746	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Audrey	Partridge	apartridge@mncee.org	Center for Energy and Environment	212 3rd Ave. N. Suite 560 Minneapolis, MN 55401	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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Bill	Poppert	info@technologycos.com	Technology North	2433 Highwood Ave St. Paul, MN 55119	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024-9583	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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Anna	Sommer	ASommer@energyfuturesgroup.com	Energy Futures Group	PO Box 692 Canton, NY 13617	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Russ	Stark	Russ.Stark@ci.stpaul.mn.us	City of St. Paul	Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul, MN 55102	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop	211 S. Harth Ave Madison, SD 57042	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST