

June 25, 2015

Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. G008/M-15-421

Dear Mr. Wolf:

Attached are the *Comments* of the Minnesota Department of Commerce, Division of Energy Resources (Department), in the following matter:

CenterPoint Energy's (CenterPoint) 2014 Demand Side Management Financial Incentive, Conservation Improvement Program Tracker Report, and Conservation Cost Recovery Adjustment Aggregated Compliance Filing (*Petition*).

The *Petition* was filed on May 1, 2015 by:

Audrey C. Peer  
Senior Regulatory Analyst, Conservation Improvement Program  
CenterPoint Energy, a Division of CenterPoint Energy Resources Corp.  
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As discussed in greater detail in the attached *Comments*, the Department recommends that the Minnesota Public Utilities Commission (Commission) **approve CenterPoint's *Petition***. The Department is available to answer any questions that the Commission may have in this matter.

Sincerely,

/s/ MICHELLE ST. PIERRE  
Financial Analyst

MS/lt  
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE  
MINNESOTA DEPARTMENT OF COMMERCE  
DIVISION OF ENERGY RESOURCES

DOCKET No. G008/M-15-421

**I. SUMMARY OF THE UTILITY'S FILING**

On May 1, 2015, CenterPoint Energy, a Division of CenterPoint Energy Resources Corporation (CenterPoint, CPE, or the Company), submitted a filing (*Petition*) to the Minnesota Public Utilities Commission (Commission or MPUC) in the above docket. The Company's *Petition* included:

- a proposed 2014 Demand Side Management (DSM) financial incentive of \$11,608,486;
- a report of proposed recovery and expenditures in its Conservation Improvement Program (CIP) tracker account during 2014; and
- a proposed change to the Conservation Cost Recovery Adjustment (CCRA).

In addition, Section I of the *Petition* contained the Company's 2014 *Status Report*. Since the *Status Report* does not require Commission approval, that portion of the *Petition* has been assigned a separate docket number.<sup>1</sup>

The Minnesota Department of Commerce, Division of Energy Resources (Department or DOC) provides its analysis and recommendations below.

**II. THE DEPARTMENT'S ANALYSIS**

The Department's analysis of CPE's *Petition* is presented below in the following sections:

- in Section II.A, CenterPoint's proposed 2014 DSM financial incentive;
- in Section II.B, CenterPoint's proposed 2014 CIP tracker account;

<sup>1</sup> See Docket No. G008/CIP-12-564.03.

- in Section II.C, CenterPoint's CCRA proposal; and
- in Section II.D, a review of CenterPoint's CIP activities for the period 2010 through 2014.

A. *CPE'S PROPOSED 2014 DSM FINANCIAL INCENTIVE*

1. *Background and Summary of CPE's Proposed 2014 DSM Financial Incentive*

The Shared Savings DSM financial incentive plan was approved by the Commission in Docket No. E,G999/CI-08-133 on January 27, 2010. On December 20, 2012, the Commission issued its *Order Adopting Modifications to Shared Savings Demand Side Management Financial Incentives* (Modification Order). The Shared Savings approach emphasizes a 1.5 percent energy savings goal, and ties the incentive earned by the utility to pursuit of the 1.5 percent savings goal. The incentive mechanism sets a specific dollar amount per unit of energy saved that each utility will earn at energy savings equal to 1.5 percent of annual non-CIP-exempt retail sales. That dollar amount is referred to as the incentive calibration. The higher the calibration, the higher the incentive will be at all energy savings levels after the threshold. Specifically, each electric utility's incentive is calibrated so that when the utility achieves energy savings equal to 1.5 percent of retail sales, electric utilities will earn an incentive equal to \$0.07 per kWh saved and gas utilities will earn \$9 per thousand cubic feet (Mcf) saved. The Commission's Modification Order stated, in part:

*The Commission hereby adopts the Department's proposal for the continuation of the new shared savings financial incentive with the following:*

- A. A threshold set at half of the utility's average achievements from 2007 to 2011 for utilities with triennial CIPs beginning in 2013, removing both the maximum and minimum achievements, or at 0.4 percent of retail sales, whichever is lowest. For utilities with triennial Conservation Improvement Programs beginning in 2014, the threshold shall be set at half of the utility's average achievements from 2008 to 2012, removing both the maximum and minimum achievements, or at 0.4 percent of retail sales, whichever is lowest.
- B. The calibration at 1.5 percent of retail sales for each utility set as follows: (1) \$9.00 per Mcf for natural gas utilities, and (2) \$0.07 per kWh for electric utilities.
- C. A utility may not modify its incentive to correct for non-linear benefits.
- D. The incentive shall be capped at 20 percent of net benefits for all utilities except for Minnesota Power. The Commission will defer a decision on the application of the 20 percent cap of net benefits for Minnesota Power until 2013 to allow

for the consideration of updated avoided cost information for this utility.

- E. The existing cap of 125 percent of a utility's 1.5 percent calibration level for the electric utilities (\$0.0875 per kWh) and a cap of 125 percent of the 1.0 percent target calibration for gas utilities (\$6.875) per Mcf are continued.
- F. The percentage of net benefits to be awarded to each utility at different energy savings levels will be set at the beginning of each year.
- G. The CIP-Exempt Class shall not be allocated costs for the new shared savings incentive. Sales to the CIP-Exempt Class shall not be included in the calculation of utility energy savings goals.
- H. If a utility elects not to include a third-party CIP project, the utility cannot change its election until the beginning of subsequent years.
- I. If a utility elects to include a third-party project, the project's net benefits and savings will be included in calculation of the percentage of net benefits awarded at specific energy savings levels (calculated before the CIP year begins) and in the post CIP year calculations of net benefits and energy savings achieved and incentive awarded. In any case, the energy savings will count toward the 1.5 percent savings goal.
- J. The energy savings, costs, and benefits of modifications to non-third-party projects will be included in the calculation of a utility's DSM incentive, but will not change the percent of net benefits awarded at different energy savings levels.
- K. The costs of any mandated, non-third-party projects (e.g., Next Generation Energy Act assessment, University of Minnesota Institute for Renewable Energy and the Environment costs) shall be excluded from the calculation of net benefits awarded at specific energy savings levels (calculated before the CIP year begins) and in the post-CIP year calculations of net benefits and energy savings achieved and incentive awarded.
- L. Costs, energy savings, and energy production from Electric Utility Infrastructure Projects (EUIC), solar installation and biomethane purchases shall not be included in energy savings for DSM financial incentive purposes.
- M. The Department shall file a recommendation with the Commission on the application of a net benefits cap for Minnesota Power's incentive by October 1, 2013. The recommendation should be filed in Docket No. E,G-999/CI-08-133.

- N. No adjustment will be made at this time to the calibration of the incentive mechanism for utilities that have Commission-approved decoupling mechanisms.
- O. The new shared savings DSM incentive shall be in operation for the length of each utility's triennial CIP plan.

Further, the Commission approved a net benefits cap of 30 percent for Minnesota Power on November 19, 2013.

With respect to net benefits, CenterPoint provided in its *Petition* the benefit-cost results of the revenue requirements test associated with the Company's 2014 CIP. According to the Company, CPE's 2014 CIP activities resulted in an estimated \$80,928,431 of net benefits before the requested incentive.<sup>2</sup> CenterPoint also stated that its CIP activities achieved energy savings in 2014 of 1,701,716 dekatherms (Dth).<sup>3</sup> Normally, this would have resulted in an incentive amount of \$12,843,491. However, there is a cap on the financial incentive of \$6.875 per Mcf saved reducing the eligible incentive amount to \$11,699,298. Thus, based on the terms and conditions of its approved DSM incentive plan and a proposed reduction of \$90,812,<sup>4</sup> CPE requested recovery of a revised DSM financial incentive of \$11,608,486.

## 2. *The Department's Review of CPE's Proposed 2014 DSM Financial Incentive*

The Department's CIP Engineering Staff review of the Company's claimed demand and energy savings that underpin CenterPoint's proposed DSM financial incentive is on-going. In all likelihood, it will not be completed before the fall of 2015. This lag between the Company's request for recovery of the incentive and completion of the Department CIP Engineering Staff review is a recurring phenomenon.

As was done last year, the Department's analysis assumes that CenterPoint's claimed 2014 energy savings are correct as filed. If the Deputy Commissioner of the Department subsequently approves changes to CenterPoint's energy savings claims that impact either recovery of CIP budgets or levels of Shared Savings DSM financial incentives, those changes can be incorporated in the Company's 2015 filing that will be made on or about May 1, 2016. CenterPoint's reported gas energy savings level is 1,701,716 Dth, in the Company's 2014 *Petition*. The Department used the 1,701,716 Dth energy savings in its review in this docket.

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<sup>2</sup> *Petition*, page 38.

<sup>3</sup> *Petition*, Cover Letter, page 1. The Department notes that CenterPoint uses a therm factor to convert gas volumes to its heat equivalent.

<sup>4</sup> The reduction is the difference between the 2013 Commission approved financial incentive of \$10,890,131 and the lower 2013 incentive of \$10,799,319 resulting from the Deputy Commissioner of the Minnesota Department of Commerce's Decision to reduce CPE's 2013 CIP energy savings on January 9, 2015 in Docket No. G008/CIP-12-564.02. See *Petition*, page 38.

According to the revised incentive calculation in CenterPoint's *Petition*, the Company receives approximately 1.51611 percent of the net benefits created by its 2014 CIP investments for every 0.1 percent of sales saved above 0.1 percent. CenterPoint estimated that it achieved energy savings of 1.25 percent of its three-year average sales from the Company's 2013-2015 Triennial Plan.<sup>5</sup> Thus, CenterPoint's 2014 DSM financial incentive would normally be 15.9 percent of the achieved net benefits, or \$12,843,491. However, as stated previously, there is a cap on the financial incentive of \$6.875 per Mcf saved, and thus based on the terms and conditions of its approved DSM incentive plan and the reduction of the 2013 financial incentive, CPE requested recovery of a revised DSM financial incentive of \$11,608,486. The Department verified the calculation of the financial incentive. Consequently, the Department recommends approval of an incentive of \$11,608,486 for CenterPoint's 2014 CIP achievements.

3. *The DOC's Overall Recommendation Concerning CenterPoint's 2014 DSM Financial Incentive*

The Department recommends that the Commission approve CenterPoint's proposed 2014 DSM financial incentive of \$11,608,486 to be included in the Company's CIP tracker account no sooner than the issue date of the Commission's *Order* in the present docket.

B. *CENTERPOINT'S 2014 CIP TRACKER ACCOUNT*

1. *Overall 2014 CIP Tracker Account*

The year-end 2014 CIP Tracker balance shows an under-recovery of \$2,285,733.<sup>6</sup> Table 1 below provides a summary of the activity in the Company's CIP tracker account during 2014 including an interim rate true-up entry of \$300,846 and an unrecovered CCRA due to billing dates of (\$10,586).<sup>7</sup>

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<sup>5</sup> *Petition*, Cover Letter, page 1.

<sup>6</sup> *Petition*, page 40.

<sup>7</sup> As discussed on page 4 of the Department's July 16, 2014 Comments in CenterPoint's most recent CIP Tracker Report, Docket No. G008/M-14-368, the adjustment is due to the misalignment of the Company billing cycle with the January 1<sup>st</sup> effective date

**Table 1: Summary of CenterPoint's CIP Tracker Account in 2014<sup>8</sup>**

<b>Description</b>	<b>Time Period</b>	<b>Amount</b>
Beginning Balance	December 31, 2013	\$ 8,501,064
CIP Expenditures <sup>9</sup>	January 1 through December 31, 2014	\$24,352,083
2013 DSM Financial Incentive	Approved in December 2014	\$10,890,131
Carrying Charges <sup>10</sup>	January 1 through December 31, 2014	(\$443,194)
Unrecovered CCRA due to billing dates	January 1 through December 31, 2014	(\$10,586)
Interim Rate True up	January 1 through December 31, 2014	\$300,846
Recovery via Base Rates	January 1 through December 31, 2014	(\$30,514,889)
Recovery via CCRA	January 1 through December 31, 2014	(\$10,789,722)
Ending Balance (over)/under	December 31, 2014	\$2,285,733

*2. The Department's Overall Recommendation Concerning CenterPoint's 2014 CIP Tracker Account*

The Department recommends that the Commission approve CenterPoint's 2014 CIP tracker account as presented in Table 1.

*C. CENTERPOINT'S PROPOSED CCRA*

Minnesota law states in relevant part that the Commission "may permit a public utility to file rate schedules providing for annual recovery of the costs of energy conservation improvements."<sup>11</sup> This annual CIP recovery mechanism is generally referred to as the Conservation Cost Recovery Adjustment (CCRA). The CCRA rate was \$0.0659/Dth for 2014 and \$0.0883/Dth for 2015. In addition, the Conservation Cost Recovery Charge (CCRC) recovered through base rates (Distribution rate) during 2014 of \$0.1866/Dth was reduced to \$0.1849/Dth in December 2014.<sup>12</sup>

In the present docket, CenterPoint requests Commission approval of a CCRA of \$0.1021/Dth, to be effective January 1, 2016.<sup>13</sup> The Company stated:

In recent CCRA filings, the Company has attempted to collect the costs for ongoing CIP activity as well as mitigate growth of the under-recovered CIP Tracker balance through increased CCRA amounts. To avoid a sudden, potentially burdensome increase in rates with increasing CCRA amounts, the Company

<sup>8</sup> *Petition*, pages 42-43.

<sup>9</sup> Includes Next Generation Energy Act of 2007 (NGEA) assessments of \$650,652 and miscellaneous (miscellaneous, travel, and meals) expenses of \$51,511.36.

<sup>10</sup> Because the Company's 2014 CIP Tracker Account was over-recovered for the majority of the year, total annual carrying charges accrued in the favor of ratepayers. CPE's Cover Letter, page 2.

<sup>11</sup> See Minn. Stat. §216B.16, subd. 6b(c).

<sup>12</sup> On August 2, 2013, the Company filed a general rate case in Docket No. G008/GR-13-316. Interim rates went into effect on October 1, 2013 and final rates went into effect in December 2014.

<sup>13</sup> *Petition*, page 45. The Company noted that it does not currently have an approved budget for 2016. For calculating the CCRA amount in this filing, CPE used the 2016 budget amount that the Company anticipated it would file on June 1, 2015 (2016 CIP Plan filing) in Docket No. G008/CIP-12-564.

had not attempted to fully erase the CIP Tracker balance in a single year. However, the previous CCRA rate increases were successful in decreasing the under-recovered balance of the Company's CIP Tracker Account over time and the 2014 year-end under-recovered balance and 2015 projected year-end balance are far lower than in recent years.<sup>14</sup>

With the proposed increase in the CCRA, CenterPoint forecasts a zero ending tracker balance by December 31, 2016.<sup>15</sup> Table 2 below summarizes the calculation of CenterPoint's CCRA.<sup>16</sup>

**Table 2: Summary of CenterPoint's CCRA<sup>17</sup>**

<b>Description</b>	<b>Amount</b>
Estimated CIP Tracker Account Balance as of December 31, 2015	\$2,298,743
Actual and Estimated CIP Expenditures - January - December 2016	\$27,647,056
Actual and Estimated Carrying Charges - January - December 2016	(\$20,361)
Actual and Estimated Base Rate Recoveries - January - December 2016	(\$24,665,907)
Estimated CIP Tracker Account Balance as of December 31, 2016 without increase	\$5,259,531
Estimated 2016 DSM Financial Incentive	\$8,365,204
Total Estimated CIP Tracker Account Balance as of December 31, 2016	\$13,624,735
Projected Sales less CIP-exempt Sales (Dth)	133,401,329
Proposed CCRA (\$/Dth)	\$0.1021

As shown in Table 2 the CCRA required to zero out the CIP Tracker Balance as of January 1, 2017 would be \$0.1021/Dth, or \$0.0145/Dth higher (a 15.6 percent increase) than the Company's current approved CCRA of \$0.0883/Dth.

The Department recommends that the Commission approve a CCRA of \$0.1021/Dth to go into effect on January 1, 2016.

The Department recommends that the Commission also approve the CenterPoint's proposed customer bill message:<sup>18</sup>

The MPUC has approved a Conservation Cost Recovery Adjustment (CCRA) factor of \$0.01021 per therm. This charge is used to fund energy conservation activities and has been added to your delivery charge. For more information please call 1-800-245-2377 or visit our website at [www.centerpointenergy.com](http://www.centerpointenergy.com).

<sup>14</sup> *Id.*

<sup>15</sup> *Petition*, page 61.

<sup>16</sup> The 2015 CIP Tracker Account projections are based on actual CIP spending through March 2015 and projected spending for April through December of 2015. The projected spending in 2015 includes pending modification requests with the filed budget amounts. *Petition*, page 45.

<sup>17</sup> *Petition*, page 63.

<sup>18</sup> *Petition*, page 46.



**D. REVIEW OF CENTERPOINT'S CIP ACTIVITIES (2010-2014)**

In Table 3 below, the Department presents a comparison of CenterPoint's DSM and CIP activities during the period 2008 through 2014. Table 3 provides an indication of how the Company's DSM financial incentives, year-end tracker balances, reported CIP expenditures, and reported energy savings have changed during that period.

**Table 3: History of CenterPoint's CIP Activities (2008-2014)<sup>19</sup>**

	2008	2009	2010	2011	2012	2013	2014
DSM Financial Incentive	\$484,182	\$1,394,200	\$3,493,921	\$4,590,392	\$3,207,411	\$10,890,131	\$11,608,486
Incentive/CIP Expenditures	5.8%	13.8%	21.1%	24.5%	16.3%	46.9%	47.7%
Carrying Charges	N/A	\$507,115	\$296,465	\$450,945	\$418,624	\$344,598	(\$443,194)
Carrying Charges/CIP Expenditures	N/A	5.0%	1.8%	2.4%	2.1%	1.5%	1.8%
Year-End Tracker Balance	\$8,147,421	\$6,879,416	\$10,216,655	\$9,248,025	\$14,225,552	\$8,501,064	\$2,285,733
Year-End Tracker Balance/CIP Expenditures	97.09%	67.99%	61.64%	49.42%	72.3%	36.6%	9.39%
CIP Expenditures <sup>20</sup>	\$8,391,297	\$10,117,898	\$16,574,737	\$18,713,923	\$19,680,178	\$23,222,379	\$24,352,083
Achieved Energy Savings (Dth)	827,340	938,978	1,300,228	1,488,231	1,330,518	1,584,019	1,701,716
Avg. Cost/Dth Saved <sup>21</sup>	\$10.14	\$10.78	\$12.75	\$12.57	\$14.79	\$14.66	\$14.31

As indicated in Table 3, compared to 2013 CenterPoint's 2014 proposed:

- DSM financial incentive is higher;
- carrying charges are higher;
- year-end tracker balance is lower;
- CIP expenditures are higher;
- achieved energy savings are higher; and
- average cost per Dth saved is lower.

<sup>19</sup> The figures in Table 3 are as initially proposed by CenterPoint and are not adjusted for later decisions.

<sup>20</sup> These figures include NGEA Assessments and EnerChange Project costs. However, these costs are excluded from CPE's financial incentive calculations. *Petition*, page 37.

<sup>21</sup> The average cost per Dth saved equals CIP expenditures (\$) divided by total energy savings (Dth).

### III. THE DEPARTMENT'S RECOMMENDATIONS

The Department recommends that the Commission:

- 1) approve CenterPoint's proposed 2014 DSM financial incentive of \$11,608,486 to be included in the Company's CIP tracker account no sooner than the issue date of the Commission's *Order* in the present docket;
- 2) approve CenterPoint's 2014 CIP tracker account, as summarized in Table 1 above;
- 3) approve the Department's proposed CCRA of \$0.1021/Dth, to be effective on January 1, 2016; and
- 4) approve the following bill message:

The MPUC has approved a Conservation Cost Recovery Adjustment (CCRA) factor of \$0.01021 per therm. This charge is used to fund energy conservation activities and has been added to your delivery charge. For more information please call 1-800-245-2377 or visit our website at [www.centerpointenergy.com](http://www.centerpointenergy.com).

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## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce  
Comments**

**Docket No. G008/M-15-421**

**Dated this 25<sup>th</sup> day of June 2015**

**/s/Sharon Ferguson**

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Robert	Walsh	bwalsh@mnvalleyrec.com	Minnesota Valley Coop Light and Power	PO Box 248 501 S 1st St Montevideo, MN 56265	Electronic Service	No	OFF_SL_15-421_M-15-421
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George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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