

January 16, 2024

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

RE: Docket No. 23-215: In the Matter of CenterPoint Energy's Natural Gas Innovation Plan

Dear Mr. Seuffert:

The City of Minneapolis ("Minneapolis") submits these Comments regarding the CenterPoint Energy Petition for Approval of its Natural Gas Innovation Plan ("Plan") filed June 28, 2023.¹ Minneapolis appreciates that the process required a significant investment of both Company and stakeholder time. We respond to each question posed by the Commission below.

- **Should the Commission approve, reject, or modify CenterPoint Energy's 2023 Natural Gas Innovation Plan ("NGIA Plan")?**

Minneapolis recommends approval with modifications as described in the next section. Modifications are necessary to protect the public interest and comply with the authorizing statute² to support projects with the most promise for greenhouse gas ("GHG") reductions at a reasonable cost.³

Pilot Evaluation

When evaluating the NGIA Plan, our initial analysis focuses on whether a pilot:

- Demonstrates the potential to lead to significant progress in reducing the climate impacts of CenterPoint operations in Minnesota in the near- to medium-term, consistent with the statutory goal to reduce economy-wide GHG emissions to net zero by 2050 as compared to 2005 levels with interim targets of:
 - 30 percent by 2025 and
 - 50 percent by 2030⁴

¹ Docket No. E002/CN-23-215. Petition by CenterPoint Energy for Approval of its First Natural Gas Innovation Plan. Jun 28, 2023.

² Minn. Stat. § 216B.2427

³ Minn. Stat. § 216B.2427 Subd. 2 b (6), (7),

⁴ Minn. Stat. § 216H.02, subd 1.

- Holds promise to be cost-effective (i.e. at scale, costs are in-line with the program benefits)
- Will positively impact comfort and affordability for customers
- Is likely improve health and equity for CenterPoint customers

We are generally concerned that with few exceptions, the pilots would put upward pressure on customer rates both in the pilot phase and if deployed at scale because the Plan tends to focus on the source of gas rather than energy efficiency. Ideally, pilots create an opportunity to address GHG emissions by curbing energy use in customer homes and businesses, making them less reliant on gas. This is analogous to the principle on the electricity side that renewable electricity like solar should be deployed only with energy efficiency for the most cost-efficient outcome. Similarly, that the cheapest energy is the NegaWatt—the unit of energy avoided because of investments in energy efficiency.⁵

GHG Emissions Reduction Effectiveness

The city’s annual GHG emissions inventory consistently shows that of all the sectors, methane gas consumption is the largest and most persistent source of climate pollution.⁶ It is important that any pilot programs approved under the NGIA hold promise for decarbonizing CenterPoint’s system. CenterPoint is proposing decades’ long infrastructure and approving the wrong pilot projects could delay building electrification—a proven pathway for reducing GHG emissions.

As a package, CenterPoint estimates that the pilots will reduce GHG emissions by 1.2 million metric tons of carbon dioxide equivalent (“CO₂e”) and equates this to:

- the energy use of approximately 150,000 homes for one year
- approximately 14% of total emissions from gas supplied to CenterPoint sales-service customers in 2020.⁷

Put another way, if emissions reductions were spread out over the 5-year plan period, the estimated emissions reductions could be framed as:

- the energy use of just 30,000 homes per year during the 5-year pilot
- less than 3% of total emissions from gas supplied to CenterPoint sales-service customers per year over 5 years.

The proposed \$112 million budget⁸ to achieve this modest increment of GHG reduction savings suggests that customers would likely benefit from the Company’s Plan being scaled back to focus on the pilots that hold the most promise for cost effectively reducing emissions and creating opportunities for participating customers to save money.

⁵ Lovins, Amory. The Negawatt Revolution. Sep. 1990. https://rmi.org/wp-content/uploads/2017/06/RMI_Negawatt_Revolution_1990.pdf.

⁶ <https://www.minneapolismn.gov/government/government-data/datasource/greenhouse-gas-emissions/>

⁷ Petition. p. 8 of 33.

⁸ Letter – Correction of Certain Cost Recovery Figures. Exhibit 1: Corrected Tables p. 2 of 2. Jul 13, 2023. <https://www.edockets.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={10155189-0000-CA15-BF9C-54CE5E363664}&documentTitle=20237-197470-01>

Pilot Analysis and Recommendations

A. Pilot A. Hennepin County Anaerobic Digestion of Organic Materials GHG and Natural Gas Savings

Minneapolis does not include analysis of Pilot A since the Company expects that the revised portfolio would remove Pilot A.⁹

B. Pilot B. RNG Produced from Ramsey & Washington Counties' Organic Waste

Minneapolis supports Pilot B if local air quality impacts are acceptable for nearby residents. Some pilot benefits could include:

- A marketable biochar product that is proven to sequester carbon
- Reducing methane emissions from landfills
- A new local fuel source that supports local economic development

Anaerobic digestion can be practical in urban areas where land for aerobic composting is not available. Further, this pilot enables the counties to go beyond composting organics to create a soil amendment that supports the state recycling goal of 75% by 2030.¹⁰ An additional benefit if CenterPoint secures a local offtaker rather than blending the gas into its distribution system includes diverting organic waste streams for gas end uses that can't easily be electrified.

C. Pilot C. Renewable Natural Gas Request for Proposal ("RFP") Purchase

Minneapolis could support Pilot C at a significantly reduced size, but at fully a third of the NGIA proposed budget, the cost of Pilot C is too high.¹¹ Funds spent on this pilot won't meaningfully benefit customers by lowering bills, improving health, or saving energy. In fact, this pilot as written and at scale would only put upward pressure on customer bills with no opportunity for customer savings.

According to CenterPoint's letter¹² dated January 3, 2024, the Company intends to transfer more funds budgeted for the Hennepin County Anaerobic Digestion pilot toward procuring RNG from food waste, dairy, wastewater treatment, and landfill to maximize an additional optional 15 percent funding under this plan.¹³ Minneapolis does not support determining RNG procurement levels based on a goal of maximizing the Company's optional spending levels.

Additionally, since CenterPoint procures all its methane fuel from out of state resources, Minneapolis has a preference for contracting with Minnesota-based projects as opposed to those in adjacent states to promote in state economic development and to limit the distance the fuel must be transported, thereby diminishing losses.

⁹ Docket No. G-008/M-23-215. Letter - Pilot Allocation Adjustments Planned for Reply Comments. In the Matter of the Petition by CenterPoint Energy for Approval of its First Natural Gas Innovation Plan. Jan. 3, 2024.

¹⁰ Minn Stat. 115A.551. <https://www.revisor.mn.gov/statutes/cite/115A.551>

¹¹ Petition. p. 9-10 of 33

¹² Letter - Pilot Allocation Adjustments Planned for Reply Comments. Jan 3, 2024.

<https://www.edockets.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={F03BD18C-0000-CE3A-9087-E8F72E7E907F}&documentTitle=20241-201812-02>

¹³ Minn. Stat. § 216B.2427, subd. 3 <https://www.revisor.mn.gov/statutes/cite/216B.2427>

Any contract under this Pilot should only be approved if the source is reasonably cost-effective in terms of life cycle GHG emissions reductions.

D. Pilot D. Green Hydrogen Blending into Natural Gas Distribution System

Minneapolis does not support Pilot D to build a second plant for blending hydrogen (“H₂”) into CenterPoint’s existing gas system. H₂ blending is known to pose leakage and safety risks which make it impractical to scale H₂ blending. Leaking H₂ would negate the climate benefit of offsetting methane and waste customer money on H₂ fuel that escapes into the atmosphere. Further the maximum technical limit for blending is often considered to be between 5% and 20% or 30%, meaning that even at scale CenterPoint’s system would continue to rely on climate-polluting methane gas as its primary fuel source for decades to come contrary to the State’s statutory goal for GHG emissions reductions of 50% by 2030.¹⁴

Risks associated with blending hydrogen into existing methane gas system include:

- Materials compatibility - Many components of methane gas infrastructure like pipes, valves, seals, etc. were not designed for H₂ gas. Hydrogen embrittlement can make steel and other materials brittle and prone to cracking, leading to leaks of both methane gas and H₂.¹⁵ Leak mechanisms through joints, threads, cracks, and pinhole defects
- Safety - H₂ has a wider flammability range than methane gas and very low ignition energy. Leaks carry an increased fire or explosion risk in customer homes.¹⁶
- Leakage - H₂ molecules are smaller than methane molecules and are even more prone to leaking through small gaps in fittings, seals, etc than methane gas.¹⁷
- Lower Efficiency – Customer combustion appliances are less efficient when burning methane gas blended with H₂, offsetting climate benefits and putting upward pressure on customer bills.¹⁸

Minneapolis notes that a H₂ blending pilot in partnership with a dedicated industrial end user may be a more appropriate investment because the customer could design and build a system with H₂ safety and efficiency in mind.

¹⁴ Minn. Stat. § 216H.02, subd 1.

¹⁵ Topolski, Kevin, Evan P. Reznicek, Burcin Cakir Erdener, Chris W. San Marchi, Joseph A. Ronevich, Lisa Fring, Kevin Simmons, Omar Jose Guerra Fernandez, Bri-Mathias Hodge, and Mark Chung. 2022. Hydrogen Blending into Natural Gas Pipeline Infrastructure: Review of the State of Technology. Golden, CO: National Renewable Energy Laboratory. NREL/TP5400-81704. <https://www.nrel.gov/docs/fy23osti/81704.pdf>.

¹⁶ Blue and Green Hydrogen Production. Clean Energy Group. <https://www.cleaneenergy.org/wp-content/uploads/Blue-and-Green-Hydrogen-Production-Harms.pdf>

¹⁷ Topolski, Kevin, Evan P. Reznicek, Burcin Cakir Erdener, Chris W. San Marchi, Joseph A. Ronevich, Lisa Fring, Kevin Simmons, Omar Jose Guerra Fernandez, Bri-Mathias Hodge, and Mark Chung. 2022. Hydrogen Blending into Natural Gas Pipeline Infrastructure: Review of the State of Technology. Golden, CO: National Renewable Energy Laboratory. NREL/TP5400-81704. <https://www.nrel.gov/docs/fy23osti/81704.pdf>. p.15, 22

¹⁸ Brania, Jonathan. Hydrogen Fuels and Gas-Fired Appliances. UL Solutions.

Pilot E. Industrial or Large Commercial Hydrogen and Carbon Capture Incentives

CenterPoint indicates “the high-level GHG estimate for this pilot is framed around CO₂ utilization.”¹⁹ Minneapolis supports this pilot under the condition that CenterPoint’s estimates for CO₂ utilization are realistic and there is an off-taker before customer funds are invested. Under these conditions, the pilot may present an opportunity for some commercial and industrial applications that are more challenging to decarbonize.

Minneapolis also recommends that the customer contribute at least 50 percent of the project cost rather than CenterPoint’s proposal to pay 100% of capital costs for project installation, up to \$1.5 million for two projects.²⁰

Pilot F. Industrial Methane and Refrigerant Leak Reduction

Minneapolis appreciates that refrigerant monitoring for leaks is included along with monitoring for methane gas leaks since refrigerants are odorless and also contribute to GHG emissions. However, CenterPoint has not attempted to quantify GHG reductions as a result of refrigerant leak repair.²¹

We recommend that if the pilot is approved, contractors be solicited from in-state to maximize local economic development benefits.

Pilot G. Urban Tree Carbon Offsets

Minneapolis supports this pilot. It is cost effective and advances other climate adaptation goals like mitigating urban heat island through urban forestry projects where people live. To better understand how the program works, Minneapolis sustainability staff interviewed City Forest Credits²² (“CFC”) and learned:

- The program assumes and factors in a 20% mortality rate over 25 years
- CFC releases the carbon credits over time to reflect that sequestering carbon in trees happens over many years
- A 3rd party inspector conducts a health audit and tree status starting at 5 years
- The program doesn’t support trees that are required to be planted by ordinance
- Each tree is tracked for 26 years
- The responsible party must purchase credits for any tree deaths where credits were already received
- At years 4, 6, 14, and 26, field monitoring is done to:
 - Measure trees
 - Verify whether trees are still alive

While the scale is small at 4,500 metric tons CO₂e reductions expected, the pilot is cost effective, and the community resilience and environmental justice benefits merit approval.

¹⁹ Petition. Exhibit F p. 12 of 22.

²⁰ Petition. Exhibit D. p. 17 of 58.

²¹ *Id.* p 19 of 58.

²² Discussion with Jen Kullgren of CFC Aug. 4, 2023.

Pilot H. Carbon Capture Rebates for Commercial Buildings

Minneapolis supports this pilot and CenterPoint's plan to leverage energy benchmarking data for customer recruitment. CleanO2 recommends customers with boiler inputs between 200,000 BTU/hr - 1,500,000 BTU/hr and this must be factored into the participant selection.²³

While having limited GHG reduction potential (an estimated 20%),²⁴ the CarbinX process is a climate-friendly way to produce KCO₃ and creates a revenue stream for hosts who are likely to continue using methane gas for heating for the next several years. It may also be possible to utilize captured CO₂ for other commercial uses.

Pilot I. New Networked Geothermal Systems

Minneapolis recommends approval with the following requirements to maximize this leading opportunity to decarbonize heating:

- Completing at least two networked geothermal systems with distinct profiles:
 - New construction (Mixed use development and/or multifamily)
 - An existing corridor with both residential and commercial customers
- Dedicated support staff to assist customers with utility and federal incentive opportunities
- Developing monitoring and evaluation plans to track system performance, emissions reductions, identify potential issues, and optimize operations
- Evaluating the proposed budget to determine if more funds from year one could be allocated to serving more customers

Networked geothermal can have positive impacts by offering customers an alternative to combusting methane gas for heat. The system wells have a long lifespan, especially if aquifer-sourced or have balanced heating and cooling loads, such as including commercial users with waste heat. The technology also has the potential to meaningfully scale displace methane gas, enhancing local economic development and resilience.

We encourage CenterPoint to seek locations that are likely to have favorable outcomes for participants with use cases that show the most promise:

- New construction will avoid retrofits and ensure buildings are efficient.
- Coordinating with local jurisdictions to co-locate where alley or street improvements are already planned to save money and minimize disruption.
- Consulting with neighborhood stakeholders "early and often" will be important for a positive experience.

Pilot J. Decarbonizing Existing District Energy Systems

²³ <https://www.carbinx.com/buy-carbinx> Accessed Dec. 21, 2023.

²⁴ *Id.*

Minneapolis supports approval of this pilot and notes the following.

- The budget of \$2.5 M in incentives is approximately \$.70 per therm and in line with CIP/ECO programs range of \$0.50-\$1.00 per therm saved.
- Covering just 20% of feasibility study costs up to \$30K²⁵ may be too low. Minneapolis recommends maintaining the cap but increasing the feasibility incentive to 50% of the cost up to \$30,000.

Pilot K. New District Energy System

Minneapolis is generally supportive of building new district heating systems as a promising approach to decarbonizing and improving heating system efficiency. Clarification about the amount of incentives to be paid would be helpful as there is differing information in pilot budget (Table 32) and the description that follows where up to \$1.5 million per project will be awarded.²⁶ It is also unclear if there are performance incentives that would extend beyond the five-year pilot.

At this time, Minneapolis does not take a position on the proposal that *“while the statutory definition requires the system to include multiple buildings, CenterPoint Energy would allow participation by customers that intend to use systems in a single building that would otherwise qualify as district energy systems”*²⁷ but notes that it is contrary to the way conventional district systems work.

We appreciate that CenterPoint plans to target sites where customers are open to hosting walk-throughs so that contractors, design firms, and others can gain exposure to the technology.

Pilot L. Industrial Electrification Incentives

Minneapolis is supportive of gaining experience with industrial heat pumps. For the three pilot projects planned, Minneapolis recommends the Commission require that the end use applications are truly novel and innovative in order to be eligible.

We also recommend that participants contribute cost share rather than the program paying for 100% of the cost up to \$1.5 million as proposed.²⁸

Pilot M. Commercial Hybrid Heating

Minneapolis supports this pilot and notes that for small businesses in environmental justice areas, an incentive of greater than 40%²⁹ may be required and justified to include a diverse group of participants.

Minneapolis supports the use of commercial energy benchmarking data as an avenue for customer recruitment. This pilot has the potential to improve health by reducing reliance on methane gas, especially if cold climate heat pumps are specified.

²⁵ Petition. Exhibit D: Full Pilot Descriptions. p. 33 of 58.

²⁶ *Id.* p. 35 of 58.

²⁷ *Id.* p.36 of 58.

²⁸ *Id.* p. 37 of 58.

²⁹ *Id.* p. 40 of 58.

Pilot N. Residential Deep Energy Retrofits and Electric Air Source Heat Pumps

Deep energy retrofitting is a valuable tool to decarbonize the economy. As one of the few pilots that has the potential to lead to improved comfort, health, and bill savings for customers, Minneapolis recommends that this pilot make up a much larger share of the overall Plan. Finding ways to help high energy users lower their bills increases housing security and can reduce the amount of bad debt absorbed by other customers. The NGIA statute requires CenterPoint to “include a pilot program that facilitates deep energy retrofits and the installation of cold climate electric air-source heat pumps in existing residential homes that have natural gas heating systems.”³⁰ But the five-year goal of just 238 participating homes³¹ is too modest compared to the \$112 million overall NGIA budget.

We note that in the *Project Description* of Pilot N, CenterPoint does not specify the inclusion of cold climate heat pumps under the pilot but instead refers simply to “air-source electric heat pumps.” We believe that the Company plans to pursue cold climate air source heat pumps per the statute and recommend that the Company clarify this in future filings related to the pilot. We support the Company’s objective that 40% of residential units under Pilot N and the Weatherization Blitzes qualify as low income or be in a disadvantaged community and recommend this as a program requirement.³²

Minneapolis agrees with the need to hold public meetings during the planning process to gather feedback on equity and diversity.³³ We also support CenterPoint’s commitment “to seek low-or-moderate income customers in the proposed Residential Deep Energy Retrofits and Electric Air Source Heat Pumps pilot... and recommend that the Company consult with an experienced community-based organization to support this priority.”³⁴

Pilot O. Small/Medium Business GHG Audit

Minneapolis favors small to medium business having GHG audits and could support this pilot for hard to decarbonize applications. However, the proposal to incentivize the carbon capture technologies being tested under another pilot may not be the best approach. Pursuing deep energy retrofits for businesses could lead to more GHG emissions benefit and increased customer bill savings. The pilot should aim to supplement ECO program funds to make it easier for customers to go beyond the ‘lowest-hanging fruit’ and invest in insulation and high efficiency appliances rather than carbon capture.

Pilot P. Residential Gas Heat Pumps and Pilot Q. Gas Heat Pumps for Commercial Buildings

Minneapolis does not support deploying gas heat pumps under the NGIA.

- The pilot costs are very expensive for the scale of reductions compared to other technologies the company could deploy. (Pilot P budgets over \$300,000 for only 235 metric tons of CO₂e reductions over the life of the units and Pilot Q budgets \$750,000 for 2,154 metric tons of CO₂e reductions over the life of the units)³⁵
- Deploying gas heat pumps would actually transition electric cooling to gas

³⁰ Minn. Stat. § 216B.2427, subd. 8 <https://www.revisor.mn.gov/statutes/cite/216B.2427>

³¹ Petition. Exhibit D. p. 43 of 58.

³² Petition. p. 18.

³³ Petition Exhibit D. p. 45 of 58.

³⁴ Petition. p. 24 of 33

³⁵ Petition. Exhibit D. p. 51, 53.

- The gas heat pump pilots are inconsistent with state and local goals for GHG emissions reductions.

Pilot R. Industrial and Large Commercial GHG Audit

Minneapolis generally supports this pilot concept. As noted by the Company, Industrial and Commercial GHG Audits can supplement CenterPoint’s ECO Plan measures to reduce GHG emissions. The pilot could help address a priority under the Minneapolis Clean Energy Partnership Workplan with CenterPoint to ‘impactfully reduce commercial and industrial natural gas use.’³⁶ However at just 10 audits and 1 GHG reduction project per year it is unclear that this pilot would demonstrate how successful GHG audits would be at scale. Also of concern is that the project delivery costs are on par with customer incentives to take action based on the audit throughout the five year pilot.

- **Should the Commission grant CenterPoint Energy’s request to spend up to 25 percent more than budgeted for pilots with higher-than-expected expenditures without seeking additional approval from the Commission, provided the increase does not cause the plan, as a whole, to exceed its statutory cost cap or fail to satisfy any other statutory requirements?**

While budget flexibility is helpful for program administration, given that the program is new and has many pilot programs, Minneapolis recommends that CenterPoint be required to seek approval for budget variances in excess of 5%.

- **Should the Commission approve CenterPoint Energy’s plan for recovering the costs associated with its 2023 NGIA plan, including the requested variance to Minn. R. 7825.2400?**

Minneapolis abstains from taking a position on the Company’s proposed cost recovery approach at this time. However, we request clarification on the following:

*The IAC and IAA will include the Company’s rate of return, income taxes on the rate of return, incremental property taxes, incremental depreciation expense, and incremental operations and maintenance expenses as authorized by the NGIA, including incremental internal labor costs.*³⁷ (emphasis added)

Specifically, we seek to understand if customers are normally billed for income taxes resulting from the company’s revenue from the rate of return customers pay. If not, Minneapolis opposes CenterPoint recovering income taxes associated with its rate of return from customers.

- **Should the Commission grant CenterPoint Energy’s request to increase the statutory budget cap for the Company’s next NGIA plan, as permitted by Minn. Stat. § 216B.2427, subd. 3(c) & (d), under the condition that “a majority” of the approved cost-effectiveness**

³⁶ 2022-2023 Minneapolis Clean Energy Partnership Work Plan.

https://mplscleanenergypartnership.org/wp-content/uploads/2022/11/CEP-2022-2023-Work-Plan_FINAL_APPROVED.pdf.

³⁷ Petition. p. 20 of 33.

objectives are achieved?

The Commission should not grant this request for the Company's next NGIA at this early stage. We recommend considering this at a later stage after the Company demonstrates whether its first NGIA plan is successful at decarbonizing its system cost effectively.

- **Are there other concerns related to this matter?**

Minneapolis recommends that the final list of pilots and the budget approved should prioritize customer benefits, including health, affordability, resilience and comfort. As proposed, the pilots rely heavily on measures that will simply drive up costs without many opportunities for individual customers to participate. Since customers are being asked to pay for the pilots, it is reasonable that there be more customer-facing benefits than procurement solutions.

Additionally, we'd like to see intentional community engagement plans for most of the pilots. The Company and customers may benefit from CenterPoint hiring experienced community-based organizations to support authentic and effective community engagement.

Minneapolis appreciates the Commission's consideration of our Initial Comments and notes that we may update our recommendations during the Reply Comment period based on other stakeholders' analysis and comments.

Respectfully submitted,

Patrick Hanlon
Deputy Commissioner of Sustainability, Healthy Homes, Environment

STATE OF MINNESOTA)

) ss. **CERTIFICATE OF SERVICE**

COUNTY OF HENNEPIN)

I, Stacy A. Miller, of the City of Minneapolis, County of Hennepin, State of Minnesota, affirm that on the 16th day of January 2024, I served a copy of the following via e-mail and/or via U.S. Mail:

COMMENTS OF THE CITY OF MINNEAPOLIS REGARDING DOCKET NO. 23-215

at the last known mailing addresses and email addresses of said entities/individuals on the attached Service List. If by U.S. Mail, I placed said document in postage prepaid envelope and placed same in the U.S. Post Office in Minneapolis, Minnesota for delivery by the United States Postal Service.



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