November 29, 2021

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G004/M-21-305

Dear Mr. Seuffert:

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

Great Plains Natural Gas Company's 2020 Conservation Improvement Program Tracker and Shared Savings Demand Side Management Incentive (Petition).

The Petition was filed on April 30, 2021 by:

Travis R. Jacobson
Director of Regulatory Affairs
Great Plains Natural Gas Co.
400 North Fourth St.
Bismarck, ND 58501

The Department recommends that the Minnesota Public Utilities Commission **approve Great Plains Natural Gas Company's filing.** The Department is available to answer any questions that the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ MICHAEL N. ZAJICEK
Rates Analyst

MNZ/ja
Attachment

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce
Division of Energy Resources

Docket No. G004/M-21-305

I. INTRODUCTION

On April 30, 2021, Great Plains Natural Gas Company (Great Plains or the Company) submitted its 2020 Conservation Improvement Program (CIP) Status Report, CIP Tracker, and Demand Side Management (DSM) Incentive to the Minnesota Public Utilities Commission (Commission). The Company's filing (Petition) included the following:

- Expenditures, as recorded in the CIP tracker account for 2020, and the recovery proposed by the Company; and
- Company-proposed changes to the Conservation Cost Recovery Adjustment (CCRA).

In addition, Sections I and II of Great Plains' Petition contain a CIP Status Report for the period January 1, 2020 through December 31, 2020. This 2020 CIP Status Report is intended to fulfill the annual reporting requirements outlined in Minnesota Rule 7690.0500. Because the Company's CIP Status Reports do not require Commission review or approval, this portion of the Petition has been assigned a separate docket number under which the Department conducted additional analyses and ultimately approved the Great Plains 2020 status report on August 9, 2021.[1]

II. DEPARTMENT ANALYSIS

Each year, the Minnesota Department of Commerce, Division of Energy Resources (Department) analyzes Great Plains' annual CIP filing to determine (1) whether the information provided by the Company complies with the applicable rules, statutes, and Commission orders and (2) whether the Company's associated proposals and requests are reasonable. The Department reviewed Sections III, IV, and V of the Petition to evaluate the CIP information provided by Great Plains and arrived at relevant recommendations for the Commission. The following discussion provides details around the Department's review and recommendations.

A. COMPLIANCE WITH PRIOR COMMISSION ORDERS

On July 4, 2020, the Commission issued its *Order* in Docket No. G004/M-20-447 with the following dispositions:

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[1] See Docket No. G004/CIP-16-121.04.

(1) Approved Great Plains Natural Gas's 2019 CIP tracker account, as summarized in Table 1 of the Department of Commerce's Comments dated July 1, 2020, resulting in a 2019 CIP tracker balance of $(719,193).

(2) Approved a 2021 Conservation Cost Recovery Adjustment (CCRA) rate of $(0.0597) per Dth, to be effective January 1, 2021.

(3) Required Great Plains Natural Gas Company to include the following bill message in the billing month immediately following the date of this Order in the current docket:

> Great Plains recovers the cost changes in its energy conservation programs from the base established in 2021 through a Conservation Cost Recovery Adjustment (CCRA) subject to MN Public Utilities Commission approval. A CCRA of [insert rate] per dk is effective [insert effective date]. Learn more about reducing your energy use by visiting our website at www.gpng.com or calling us at 1-877-267-4764.

(4) Required Great Plains to submit a compliance filing, simultaneously with the filing of compliance tariffs in Docket No. G-004/GR-19-511, with revised tariff sheets reflecting the Commission's determinations in this matter. The Conservation Improvement Program Adjustment Clause tariffs shall reference both Docket No. G-004/M-20-448 and Docket No. G-004/GR-19-511.

(5) Delegated to the Executive Secretary the authority to resolve any remaining issues with the bill message

Additionally, in response to past CIP filings, the Commission has directed Great Plains to provide certain information in all future CIP filings. Those directives require Great Plains to:[2]

- Update the interest rate used to calculate carrying charges to match the short term cost of debt approved by the Commission in the Company's most recent rate case;

- Use a CCRA calculation methodology that adequately accounts for carrying charges associated with the financial incentive; and

- Calculate the CCRA based on the existing tracker balance as well as projected sales, expenditures, financial incentive(s), and any pertinent adjustments that may occur over the period the CCRA will be in place.

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[2] These requirements were established by the Commission's November 23, 2016 *Order Approving Tracker Account, Approving Financial Incentive, Setting Carrying-Charge Rate, and Setting Conservation Cost Recovery Adjustment* in Docket No. G004/M-16-384.

Based on its review, the Department concludes that the Company's current Petition has complied with the requirements outlined by the Commission.

B. DSM FINANCIAL INCENTIVE CALCULATION

The following two sections provide (1) background information on and context around the Shared Savings DSM financial incentive and (2) the Department's evaluation of Great Plains' proposed incentive level based on 2020 CIP achievements.

1. Background on the DSM Financial Incentive

The Shared Savings DSM financial incentive plan was initially approved by the Commission in Docket No. E, G999/CI-08-133 on January 27, 2010.[3] The Commission later approved a *modified* Shared Savings DSM financial incentive mechanism in its August 5, 2016, *Order* in Docket No. E, G999/CI-08-133. The new incentive mechanism, which became effective January 1, 2017, is triggered for (1) an electric utility, when it achieves energy savings of 1 percent and (2) a gas utility, when it achieves energy savings of 0.7 percent. The percentage of energy savings is calculated on the utility's most recent three-year average of weather-normalized retail sales.[4] For 2019, the electric and gas incentives are capped at 10 percent of net benefits and 30 percent of CIP expenditures. The Commission's *Order* included the following language:[5]

(1) The Commission hereby revises its Shared Savings DSM Financial Incentive Plan with the modifications set forth below.

B. For gas utilities, the plan is modified to do the following:
1) Authorize financial incentives for a utility that achieves energy savings of at least 0.7 percent of the utility's retail sales.
2) For a utility that achieves energy savings equal to 0.7 percent of retail sales, award the utility a share of the net benefits as set forth in Attachment A.
3) For each additional 0.1 percent of energy savings the utility achieves, increase the net benefits awarded to the utility by an additional 0.75 percent until the utility achieves savings of 1.2 percent of retail sales.

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[3] For additional details, see also the Commission's December 20, 2012 Order in Docket No. E, G999/CI-08-133.

[4] Retail sales for this calculation exclude the retail sales to customers who are owners of a large customer facility and have been granted an exemption by the Department's Commissioner under Minnesota Statutes §216B.241, Subd. 1a(b).

[5] The quote shown here is limited to the sections relevant to natural gas utilities; the Commission's *Order* in Docket No. E,G999/CI-08-133 also modified the electric utility financial incentive calculation.

4) For savings levels of 1.2 percent and higher, award the utility a share of the net benefits equal to the Net Benefits Cap.

C. For all utilities, set the following Net Benefit Caps:

1) 13.5 percent in 2017,
2) 12.0 percent in 2018, and
3) 10.0 percent in 2019.

D. For all utilities, set the following Conservation Improvement Plan (CIP) Expenditure Caps:

1) 40 percent in 2017,
2) 35 percent in 2018, and
3) 30 percent in 2019.

(2) The Commission retains certain provisions from the current Shared Savings DSM Financial Incentive Plan, with slight modifications, as follows:

A. CIP-exempt customers shall not be allocated costs for the new shared savings incentive. Sales to CIP-exempt customers shall not be included in the calculation of utility energy savings goals.

B. If a utility elects not to include a third-party CIP project, the utility cannot change its election until the beginning of subsequent years.

C. If a utility elects to include a third-party project, the project's net benefits and savings will be included in the calculation of the energy savings and will count toward the 1.5 percent savings goal.

D. The energy savings, cost, and benefits of modifications to non-third-party projects will be included in the calculation of a utility's DSM incentive.

E. The costs of any mandated, non-third-party projects (e.g., the 2007 Next Generation Energy Act assessments,[68] University of Minnesota Initiative for Renewable Energy and the Environment costs[69]) shall be excluded from the calculation of net benefits and energy savings achieved and incentive awarded.

F. Costs, energy savings, and energy production related to Electric Utility Infrastructure Costs,[70] solar installation,[71] and biomethane purchases[72] shall not be included in energy savings for DSM financial incentive purposes.

(3) The new Shared Savings DSM Incentive Plan shall be in effect for 2017-2019.

(4) Utilities may discontinue the annual February 1 compliance filing because a scale of net benefits will no longer be required since the Department's proposal sets percentages at certain savings thresholds and calibrates the mechanism to dollars per unit of energy.

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[68] *See* 2007 Laws, art. 2.
[69] *Id*., § 3, subd. 6.
[70] Minn. Stat. § 216B.1636.
[71] Minn. Stat. § 216B.241, subd. 5a.
[72] *Id*., subd. 5b.

2. Department's Review of Great Plains' 2020 Proposed DSM Financial Incentive

Based on its 2020 CIP results, Great Plains calculated a DSM financial incentive award of $0. The Company explained that its energy savings totaled 20,537 dekatherms (Dth or dk), resulting in a savings achievement level of 0.37 percent,[6] which fell short of the 0.7 percent threshold required to receive the incentive. Great Plains reported that in 2020, the Company's CIP produced an estimated $619,961 of net benefits.[7] The Department confirmed Great Plains' calculation of the Company's energy savings achievement level and concludes that the Company did not qualify for the DSM financial incentive award in 2020.

The Department is also conducting an ongoing engineering-oriented analysis of the energy savings and net benefits reported in Great Plains' annual CIP status report.[8] Generally this analysis is not completed before the instant Comments are due, however due to delays and the Deputy Commission approved the Great Plains 2020 status report on August 9, 2021 with no changes prior to the filing of these comments.[9] Generally the lag between the Department's completion of its engineering analysis and its review of the DSM financial incentive, CIP tracker, and CCRA is typical and recurs from year to year.

Last year, as in previous years, the Department compensated for this lag by (1) assuming Great Plains' reported energy savings for 2019 were correct as filed and (2) planning to make any adjustments approved by the Department's Deputy Commissioner in the instant proceeding.

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[6] (20,537 Dth /5,580,608 Dth) = 0.00365

[7] See Attachment F of the Petition for each of the figures noted in this paragraph.

[8] The engineering-oriented analysis will be conducted by the Department under Docket No. G004/CIP-16-121.04.

[9] See Docket No. G004/CIP-16-121.04.

On August 6, 2020, the Deputy Commissioner approved Great Plains' 2019 CIP Status Report without any adjustments in Docket No. G004/CIP-16-121.03, and thus none need to be made in the instant docket.

A. GREAT PLAINS' CIP TRACKER ACCOUNT

In its Petition, Great Plains submitted for approval the recoveries and expenditures recorded in the Company's CIP tracker account during 2020. Table 1 provides a summary of these activities.

Table 1: Summary of Great Plains' CIP Tracker Account in 2020[10]

Line	Description	Time Period	Amount
1	Beginning Balance	Jan. 1, 2020	($716,193)
2	CIP Expenses	Jan. 1, 2020 – Dec. 31, 2020	$503,433
3	DSM Financial Incentive	Approved in 2020 for 2019 activities	$0
4	Carrying Charges	Jan. 1, 2020 – Dec. 31, 2020	($9,855)
5	CIP Expenses Subtotal [Line 1 + Line 2 + Line 3 + Line 4]	Jan. 1, 2020 – Dec. 31, 2020	($222,615)
6	CCRC Recovery	Jan. 1, 2020 – Dec. 31, 2020	$318,723
7	CCRA Recovery	Jan. 1, 2020 – Dec. 31, 2020	($193,141)
8	CIP Revenues Subtotal [Line 6 + Line 7]	Jan. 1, 2020 – Dec. 31, 2020	$125,582
9	Ending Balance [Line 5 - Line 8]	Dec. 31, 2020	($348,197)

The Company reported using an annual carrying charge rate equal to the Company's short term cost of debt, which was approved in Docket No. G004/GR-15-879.[11] The annual rate in question is 1.610 percent, which, when divided by 12 months, results in the 0.13 percent carrying charge rate applied by the Company to the CIP tracker beginning balance for each month in 2020.[12] Great Plains CIP tracker

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[10] The data in Table 1 is taken from pages 2 - 3 of Petition Attachment E.

[11] In Great Plains' pending rate case in Docket No. G004/GR-19-511, the Company has proposed a new short-term cost of debt of 3.693 percent. In its comments, Great Plains stated that this proposal is uncontested. Great Plains intends to implement this rate as the new carrying charge rate in the CIP tracker starting January 1, 2021, and so it is not used in the 2020 CIP trackers.

[12] See page 4 of Petition Attachment E. Dividing the figures under the column labeled "Carrying Charge 1/" by the corresponding figures under the column labeled "Beginning Balance" equals an applied carrying charge rate of 0.0013, or 0.13%.

balance showed an over-recovery of CIP costs for all months of calendar year 2020, meaning that carrying charges accrue to ratepayers.

The Department concludes that the ending balance in the Company's 2020 CIP tracker is mathematically accurate, based on the data provided by Great Plains in Attachment E of its Petition. The Department recommends that the Commission approve Great Plains' 2020 CIP tracker, as summarized in Table 1 above.

A. GREAT PLAINS' CONSERVATION COST RECOVERY ADJUSTMENT

Minnesota Statutes 2016B.16., Subd. 6b(c) states that the Commission "may permit a public utility to file rate schedules providing for annual recovery of the costs of energy conservation improvements." This CIP recovery mechanism is alternately referred to as the Conservation Cost Recovery Adjustment (CCRA), CIP Rider, or CIP Surcharge. The Department reviews the CCRA proposed by Great Plains each year in the Company's annual CIP filing.

1. Great Plains' CCRA Proposal

Great Plains' CCRA would ideally be set at a rate that brings the Company's CIP tracker balance as close to zero as possible. Doing so avoids significant over or under recovery of CIP costs by the Company, thus minimizing carrying charges and stabilizing CCRA rates. After observing the Company's relatively high CIP tracker balances over several earlier years,[13] the Department recommended in 2016 that Great Plains use a forward-looking rather than backward-looking methodology to calculate the Company's CCRA. Using a forward-looking methodology helps a utility maintain a CIP tracker balance closer to zero, minimize carrying charges, and account for CIP expense fluctuations. The Commission agreed with the Department's recommendations and directed the Company "to calculate the CCRA based on the existing tracker balance, as well as the projected sales, expenditures, financial incentive(s), and any pertinent adjustments that may occur over the period the CCRA will be in place."[14] This approach thus far appears to have been somewhat effective, as the tracker balance peaked in 2016.

In its Petition, Great Plains reported an over-recovered CIP tracker balance of ($348,197) at the end of the 2020 calendar year. Accordingly, Great Plains has requested approval for a revised CCRA rate of $0.0895 per Dth, which translates to a $0.1492 increase from the current CCRA of ($0.0597) per Dth.

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[13] In the Company's rate case in Docket No. G004/GR-15-879, the Company increased its CCRC beginning January 1, 2016 and incorrectly decreased the CCRA by the same amount, effective on the same date. This resulted in a negative CCRA, which moved the Company further from its CIP tracker balance goal of zero. The Department raised concerns about this treatment of the CCRA in the Company's CIP filing in Docket No. G004/M-16-384, and the Commission clarified in item 7 of its November 23, 2016 *Order* that the CCRA should only be adjusted after a thorough review of the Company's CIP tracker.

[14] Commission *Order* in Docket No. G004/M-16-384, item 6.

The proposed rate was derived by assuming a CCRA recovery of ($494,571) over a 12-month period, with 6,046,096 Dth in sales. [15] As a result of the requested CCRA increase, the average residential customer using 77 Dth per year would pay a total annual CIP cost of $13.19, representing a $11.49 increase from the current total annual CIP cost of $1.70.[16]

Great Plains proposed to implement the new CCRA on September 1, 2021. However, the Department notes that due to delays these comments were not filed until after the proposed date, and thus the Commission has not had a chance to act and thus implement the proposed rate. Therefore, the Department recommends that the Commission implement the proposed CCRA on the next billing period after the Commission issues it order, with Great Plains filing a compliance filing updating the rate to account for the shorter recovery period.
The Company has estimated that by the time its proposed CCRA and CCRC were proposed to take effect, September 1, 2021, Great Plains' CIP tracker balance would be under-recovered by $36,514. This projection is shown in Table 2.

Table 2: Great Plains' projected 2021 CIP tracker account, using the current CCRA and CCRC rates (April-December values estimated)[17]

Line	Description	Time Period	Amount
1	Beginning Balance	Jan. 1, 2021	($348,197)
2	CIP Expenses	Jan. 1, 2021 – Aug. 31, 2021	$463,931
3	DSM Financial Incentive	Approved in 2021 for 2020 activities	$0
4	Carrying Charges	Jan. 1, 2021 – Aug. 31, 2021	($3,747)
5	CIP Expenses Subtotal [Line 1 + Line 2 + Line 3 + Line 4]	Jan. 1, 2021 – Aug. 31, 2021	$111,987
6	CCRC Recovery	Jan. 1, 2021 – Aug. 31, 2021	$221,651
7	CCRA Recovery	Jan. 1, 2021 – Aug. 31, 2021	($146,178)
8	CIP Revenues Subtotal [Line 6 + Line 7]	Jan. 1, 2021 – Aug. 31, 2021	$75,473
9	Ending Balance [Line 5 - Line 8]	Aug. 31, 2021	$36,514

[15] See pages 1-2 of Petition Attachment E for these figures.

[16] Total estimated annual CIP costs include both CCRC and CCRA charges, and Great Plains proposed to increase the CCRC in the pending rate case. See page 1 of Petition Attachment E.

[17] Data in Table 2 retrieved from pages 2 and 4 of Petition Attachment E.

The projected data in Table 2 demonstrate that the Company anticipates increasing its December 31, 2020 CIP tracker balance an estimated $384,711[18] by August 31, 2021, thus moving the tracker closer to the ideal $0 balance.

Table 3 provides details behind Great Plains' calculation of its proposed CCRA rate of $0.0895.

Table 3: Great Plains' Calculation of the Company's Proposed CCRA Rate

Line	Description	Time Period	Amount
1	Beginning Balance	Sept. 1, 2021	$36,514
2	CIP Expenses	Sept. 1, 2021 - Aug. 31, 2022	$1,000,257
3	DSM Financial Incentive	Approved in 2022 for 2021 activities	$0
4	Carrying Charges	Sept. 1, 2021 - Aug. 31, 2022	($982)
5	CIP Expenses Subtotal [Line 1 + Line 2 + Line 3 + Line 4]	Sept. 1, 2021 - Aug. 31, 2022	$1,035,789
6	CCRC Recovery	Sept. 1, 2021 - Aug. 31, 2022	$494,571
7	Remaining Amount to be Recovered through CCRA [Line 5 - Line 6]	Sept. 1, 2021 - Aug. 31, 2022	$541,218
8	Projected Sales (Dth)	Sept. 1, 2021 - Aug. 31, 2022	6,046,096
9	Proposed CCRA Rate ($/Dth) [Line 7/Line 8]	Effective Sept. 1, 2021	$0.0895

The Department supports the Company's proposal to implement a CCRA rate of $0.0895, as this will help Great Plains to bring its tracker balance closer to $0.

The Department confirmed Great Plains' calculations and recommends approval of the proposed rate after being updated to account for the above-mentioned shorter recovery period. Additionally, as stated above, the Department recommends that the Commission implement the proposed CCRA on the next billing period after the Commission issues its order, with Great Plains filing a compliance filing updating the rate to account for the shorter recovery period.

3. *Customer Notification Method for the CCRA Proposal*

In addition to updating the relevant tariff sheet, the Department recommends that the Commission require the Company to include a message on its customer bills providing notification of any approved CCRA rate change. The Department recommends that the Commission require Great Plains to include

[18] ($348,197 + $36,514) = $384,711

the following bill message in the billing month immediately following the date of the Order in the instant docket:

> Great Plains recovers the cost changes in its energy conservation programs from the base established in 2021 through a Conservation Cost Recovery Adjustment (CCRA) subject to MN Public Utilities Commission approval. A CCRA of [insert rate] per dk is effective [insert effective date]. Learn more about reducing your energy use by visiting our website at www.gpng.com or calling us at 1-877-267-4764.

C. REVIEW OF GREAT PLAINS' DSM AND CIP DATA OVER TIME (2007 - 2020)

The Department's Attachment A to these Comments provides a historical comparison of Great Plains' DSM and CIP activities from 2007 (the year of the passage of the Next Generation Energy Act) through 2020. Attachment A shows how the Company's carrying charges, year-end tracker balances, DSM financial incentives, CIP expenditures, and energy savings have changed over time. As noted in the Department's comments last year, Great Plains' CIP expenditures and the corresponding energy savings have fluctuated each year between 2007 and 2020, without demonstrating a consistent increasing or decreasing pattern.

The Department further examined energy savings, demand savings, expenditures, and incentive values for select years between 2007 and 2020. In Table 4 below, the Department compared 2020 values to 2019 values, 2020 values to average 2018-2020 values, and average 2018-2020 values to average 2007-2009 values.

Table 4: Energy Savings, Expenditures, and Incentives for Selected Years, 2007-2020

	Energy Savings (kWh)	CIP Expenditures	Shared Savings Incentive
2020	20,537	$503,433	$0
2019	13,175	$499,310	$0
Average 2016-2020	23,265	$523,121	$0
Average 2007-2009	11,719	$229,119	$21,943
Compare 2020 to 2019	55.9%	0.8%	n/a
Compare 2020 to Avg. 2018-2020	-11.7%	-3.8%	n/a
Compare Avg. 2018-2020 to Avg. 2007-2009	98.5%	128.3%	-100.0%

The Department observes that Great Plains' energy savings and expenditures increased from 2019 to 2020. The increase in savings was much higher at 55.9 percent than the increase in expenditures at 0.8 percent. Great Plains did not qualify for an incentive in either year.

When comparing 2020 to the average values for years 2018-2020, the Department observes that expenditures remained fairly stable with an only 3.8 percent change. The Department further notes that Great Plains' 2020 savings were 11.7 percent less than 2018-2020 average savings, while it was 55.9 percent more than 2019 savings. This appears to be due to low achieved energy savings in 2019 (13,175 Dth saved), as shown in Attachment A, Table 1. Again, the Company did not qualify for a financial incentive in any year between 2018 and 2020.

When comparing 2007-2009 averages to 2018-2020 averages, Great Plains has increased both its energy savings and expenditures, the former by 98.5 percent and the latter by 128.3 percent. However, these increases have not kept pace with the higher threshold of the financial incentive, as the Company's incentive decreased 100 percent.[19] Further, the increase in savings and spending between the 2007-2009 period and 2018-2020 period does not capture information in the intervening years, which saw the Company's highest savings and spending achievements.

Great Plains cited lower participation in its Custom Projects (part of the Commercial and Industrial customer segment), as a reason for lower CIP savings. The Department's CIP engineering staff confirm that custom projects typically achieve higher energy savings than other project types, and at a relatively low cost.

III. DEPARTMENT CONCLUSIONS AND RECOMMENDATIONS

Based on its review of the Great Plains Natural Gas Company's Petition the Department recommends the Commission take the following actions:

- Approve Great Plains Natural Gas Company's 2020 CIP tracker account, as summarized in Table 1 of these Comments, resulting in a 2020 CIP tracker balance of ($348,197);
- Approve a 2022 CCRA rate of $0.0895 per Dth, updated to account for a shorter recovery period, to be effective the first billing period after the Commission issues its Order;
- If the proposed CCRA rate is approved, require Great Plains Natural Gas Company to include the following bill message in the billing month immediately following the date of the Order in the current docket:

[19] Beginning in 2017, the threshold for Shared Savings incentives for gas utilities was set at 0.7 percent of non-CIP-opt-out retail sales. GPNG's Dth savings achievements have only met or exceeded 0.7 percent two years, 2015 and 2016.

> Great Plains recovers the cost changes in its energy conservation programs from the base established in 2021 through a Conservation Cost Recovery Adjustment (CCRA) subject to MN Public Utilities Commission approval. A CCRA of [insert rate] per dk is effective [insert effective date]. Learn more about reducing your energy use by visiting our website at www.gpng.com or calling us at 1-877-267-4764.

- Require Great Plains Natural Gas Company to submit a compliance filing, within 10 days of the issue date of the Order in the present docket, with revised tariff sheets reflecting the Commission's determinations in this matter.

The Department is available to answer any questions the Commission may have.

Attachment A, Table 1: Great Plains' Historical CIP Achievements, Incentives, and Tracker Balance, 2010 – 2019

Column ID		A	B	C	D	E	F	G	H	I	J
Year	*Great Plains' CIP Docket Number*	*CIP Expenditures (Excluding Incentives)*	*Achieved Energy Savings (Dekatherms)*	*CIP Expenditures (Excluding Incentives) per Dekatherm Saved (A/B) = C*	*DSM Financial Incentive*	*Total CIP Cost per Dekatherm Saved (A+D)/B*	*DSM Financial Incentive as a % of CIP Expenditures (D/A) = F*	*Carrying Charges*	*Carrying Charges as a % of CIP Expenditures (G/A) = H*	*Year-End Tracker Balance*	*Year-End Tracker Balance as a % of CIP Expenditures (I/A) = J*
2007	08-480	$244,304	17,658	$13.84	$65,828	$17.56	26.95%				
2008	09-508	$256,468	9,524	$26.93	$0	$26.93	0.00%				
2009	10-418, 10-419	$186,584	7,975	$23.40	$0	$23.40	0.00%				
2010	11-404	$427,847	17,426	$24.55	$18,915	$25.64	4.42%	-$7,527	-1.8%	$52,659	12.3%
2011	12-439	$370,570	24,604	$15.06	$37,707	$16.59	10.18%	$10,979	3.0%	$324,363	87.5%
2012	13-334	$401,694	41,509	$9.68	$114,763	$12.44	28.57%	$24,008	6.0%	$369,299	91.9%
2013	14-358	$378,794	14,969	$25.31	$24,137	$26.92	6.37%	$27,097	7.2%	$397,382	104.9%
2014	15-422	$327,380	19,788	$16.54	$42,180	$18.68	12.88%	$9,732	3.0%	-$49,755	-15.2%
2015	16-384	$724,644	69,393	$10.44	$477,077	$17.32	65.84%	-$1,094	-0.2%	$241,051	33.3%
2016	17-338	$642,143	56,669	$11.33	$345,928	$17.44	53.87%	$2,346	0.4%	$1,060,837	165.2%
2017	18-118	$403,118	13,577	$29.69	$0	$29.69	0.00%	$8,659	2.1%	$224,198	55.6%
2018	19-287	$566,621	36,083	$15.70	$0	$15.70	0.00%	-$9,581	-1.7%	-$830,804	-146.6%
2019	20-448	$499,310	13,175	$37.90	$0	$37.90	0.00%	-$14,083	-2.8%	-$716,193	-143.4%
2020	21-305	$503,433	20,537	$24.51	$0	$24.51	0.00%	-$9,855	-2.0%	-$348,197	-69.2%