



December 19, 2025

VIA eFILING

Ms. Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2116

RE: In the Matter of CenterPoint Energy's 2024 Energy Conservation and Optimization Status Report, 2024 Demand Side Management Financial Incentive, 2024 Energy Conservation and Optimization Tracker Report, and 2025/2026 Conservation Cost Recovery Adjustment
Docket No. G-008/M-25-43

Letter

Dear Ms. Bergman:

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or the "Company") respectfully submits the following *Letter* requesting clarification of the Minnesota Public Utilities Commission's ("Commission") Order issued November 20, 2025. The Company respectfully requests clarification for how it should interpret the Commission's order disallowing financial incentive for efficient fuel switching ("EFS") in order to help inform future development and administration of its Energy Conservation and Optimization ("ECO") programs.

On November 20th, 2025, the Commissioners issued a written order approving "CenterPoint Energy's requested DSM Shared Savings Financial incentive of \$7,942,034 for 2024 activities, less \$61,981, representing claimed savings from Efficient Fuel Switching Air Source Heat Pump installations." During the hearing on November 13th, 2025, the Commission indicated the EFS portion of the incentive should be disallowed

because the Company's rebate for ASHPs was lower than Xcel Energy's rebates and Xcel offered Xcel electric and CenterPoint Energy gas customers rebates to make-up the difference between the two companies' offerings.

CenterPoint Energy submits this letter seeking clarification about how it should interpret this order with regards to the design and implementation of future EFS rebates. During the hearing, it was noted that this issue is resolved for the 2025 and 2026 program years because the Company's ASHP rebate matches Xcel Energy's. However, the Company believes that the underlying concerns expressed by Commissioners during the hearing are not necessarily resolved in the long-term. The regulatory record on this topic could be interpreted in several ways moving forward as the Company undergoes its 2027-2029 ECO Triennial Planning process in the coming months.

CenterPoint Energy's flexibility for offering EFS (and other rebates) may be lower in the coming 2027-2029 ECO Triennial Plan. As context for why clarification is important, electric and gas utilities have different cost-effectiveness frameworks for evaluating ECO programs. The cost and benefits of EFS measures to the gas utility and its customers differ from electric utilities because of the potential for load building for the electric utility, but also in other respects such as how the peak demand of each utility is affected by EFS measures. Recently, the Department of Commerce ("DOC") has proposed to alter the assumed furnace baseline efficiency.¹ This would result in a substantial decrease in energy savings from residential HVAC equipment for gas utilities. The new cost-effectiveness framework for 2027-2029 may further reduce ECO program cost-effectiveness as assumptions are aligned with current market conditions. The outcomes of these changes may significantly reduce cost-effectiveness of ECO programs for gas utilities. With reduced cost-effectiveness, in order to run a cost-effective portfolio of programs the equipment rebates may need to change to align with the energy savings potential of the measures and the benefits to customers.

CenterPoint Energy believes a better understanding of the Commissioners expectations around appropriate rebates for EFS measures is important for future program planning and design. For example, one interpretation of the order is that to claim financial incentive on the net benefits of EFS measures, the Company must match Xcel Energy rebates. This could include matching changes to Xcel's rebates for 2027-2029 or matching new CenterPoint Energy EFS rebates to Xcel Energy's.

CenterPoint Energy appreciates the consideration of our requests for clarification and any information the Commission could share with regards to expectations for how the

¹ See *In the Matter of Technical Reference Manual Version 5.0*, Docket No. E,G-999/CIP-18-694, Reply Comments (Department, Dec. 15, 2025).

Company incorporates EFS measures into the Company's 2027-2029 ECO Triennial Planning process in order to claim a financial incentive. If you have questions, please contact me at (612) 321-4324 or ethan.warner@centerpointenergy.com.

Sincerely,

/s/ Ethan Warner

Ethan Warner
Regulatory Affairs Manager, Energy Conservation and Optimization Programs
CenterPoint Energy

C: Service List

In the Matter of Commission Review of
Utility Performance Incentives for Energy
Conservation

Docket No. G-008/M-25-43

December 19, 2025

Letter

CERTIFICATE OF SERVICE

I, Christina Benning, served the attached *Letter* of CenterPoint Energy on the attached service list for Docket No. E G-008/M-25-43 by electronic service.

/s/ Christina Benning

Senior Regulatory Paralegal
CenterPoint Energy

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3	Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-43
4	Sasha	Bergman	sasha.bergman@state.mn.us	Public Utilities Commission		121 7th Pl E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-43
5	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	M-25-43
6	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-43
7	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	M-25-43
8	Mike	Bull	mike.bull@state.mn.us	Public Utilities Commission		121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-43
9	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	M-25-43
10	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General - Department of Commerce		445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-43
11	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	M-25-43
12	Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.		7701 France Ave S Ste 600 Edina MN, 55435 United States	Electronic Service		No	M-25-43
13	Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.		823 E 7th St St. Paul MN, 55106 United States	Electronic Service		No	M-25-43

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21	Jeffrey	Haase	jhaase@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-43
22	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	M-25-43
23	Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency		702 3rd Ave S Virginia MN, 55792 United States	Electronic Service		No	M-25-43
24	Martin	Kapsch	martin.kapsch@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-43
25	Deborah	Knoll	dknoll@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-43
26	Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas		null null, null United States	Electronic Service		No	M-25-43
27	Tina	Koecher	tkoecher@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	M-25-43

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31	Josh	Mason	jmason@rpu.org	Rochester Public Utilities		4000 E River Rd NE Rochester MN, 55906 United States	Electronic Service		No	M-25-43
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35	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-43
36	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	M-25-43
37	Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	M-25-43
38	Bill	Poppert	info@technologycos.com	Technology North		2433 Highwood Ave St. Paul MN, 55119 United States	Electronic Service		No	M-25-43
39	Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024-9583 United States	Electronic Service		No	M-25-43
40	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General - Residential Utilities Division		1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	M-25-43

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42	Rick	Sisk	rsisk@trccompanies.com	Lockheed Martin		1000 Clark Ave. St. Louis MO, 63102 United States	Electronic Service		No	M-25-43
43	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	M-25-43
44	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	M-25-43
45	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 United States	Electronic Service		No	M-25-43
46	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-43
47	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	M-25-43
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3	Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company		PO Box 351 200 1st St SE Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
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12	George	Crocker	gwillc@nawo.org	North American Water Office	5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST	
13	Bradley	Davison	bradley.davison@mdu.com	Great Plains Natural Gas Company		Electronic Service		No	ECO SPECIAL SERVICE LIST	
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34	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
35	Josh	Mason	jmason@rpu.org	Rochester Public Utilities		4000 E River Rd NE Rochester MN, 55906	Electronic Service		No	ECO SPECIAL SERVICE LIST

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36	Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company		4902 N Biltmore Ln PO Box 77007 Madison WI, 53707-1007 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
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39	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
40	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
41	Larry	Oswald	larry.oswald@mdu.com	Great Plains Natural Gas Company		105 W Lincoln Ave PO Box 176 Fergus Falls MN, 56538-9001 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
42	Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
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