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December 15, 2025

—Via Electronic Filing—

Sydney Lieb  
Assistant Commissioner of Regulatory Affairs  
Minnesota Department of Commerce  
Division of Energy Resources  
85 7<sup>th</sup> Place East, Suite 500  
St. Paul, MN 55101-2198

RE: REPLY COMMENTS  
IN THE MATTER OF THE TECHNICAL REFERENCE MANUAL VERSION 5.0  
DOCKET NO. E,G999/CIP-18-694

Dear Assistant Commissioner Lieb:

Northern States Power Company, doing business as Xcel Energy, submits this Reply in response to Comments received on November 21, 2025 regarding the Department of Energy Resources' (Department) Proposed Decision on the Technical Reference Manual (TRM) Version 5.0.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Angela Smelser at 612-216-8120 or [Angela.R.Smelser@xcelenergy.com](mailto:Angela.R.Smelser@xcelenergy.com) or contact me at 612-330-7974 or [Christopher.J.Shaw@xcelenergy.com](mailto:Christopher.J.Shaw@xcelenergy.com) if you have any questions regarding this filing.

Sincerely,

/s/

CHRISTOPHER J. SHAW  
MANAGER, REGULATORY POLICY

Enclosures  
cc: Service Lists

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA DEPARTMENT OF COMMERCE

IN THE MATTER OF THE MINNESOTA  
TECHNICAL REFERENCE MANUAL  
VERSION 5.0

DOCKET NO. E,G999/CIP-18-694

**REPLY**

**INTRODUCTION**

Northern States Power Company, doing business as Xcel Energy, submits this Reply in response to Comments received on November 21, 2025 regarding the Department of Energy Resources' (Department) Proposed Decision on the Technical Reference Manual (TRM) Version 5.0.

We appreciate the Comments submitted by CenterPoint Energy, Center for Energy and Environment (CEE), Fresh Energy, the Joint Commenters, Minnesota Energy Resource Corporation and Otter Tail Power Company. However, we disagree with parties who have indicated support for utilizing the technical reference manual to adjust policy for Energy Conservation and Optimization (ECO) programs. The Technical Reference Manual Advisory Committee (TRMAC) and Technical Reference Manual (TRM) are intended to provide utilities with a broad set of measures that can be implemented to achieve conservation goals, and a set of accepted technical assumptions for calculating the expected energy savings for those measures. Determining which measures, how to market these measures, and if measures are allowed, extends beyond the scope of this docket. The Company continues to support adjustments in the TRM that are supported by code and federal changes as well as those thoroughly discussed as part of the TRMAC process.

We recommend maintaining the baseline for the furnace and boiler measures at 80 percent AFUE in TRM v.5.0 to review the market implications in Minnesota as well as fully assess the impacts of a change to the baseline. Furthermore, we appreciate CEE's constructive suggestion that if utilities can verify that the actual efficiency of an existing furnace is below 90 percent AFUE, the federal minimum standard of 80 percent AFUE should be used. If the baseline is changed, CEE's suggestion may provide a reasonable approach for utilities to present as part of their Triennial Plans. However, we do not believe it is necessary for the Department to make a determination on this approach as part of this docket. Moreover, as discussed during

the TRMC process, any adjustment to the future of measures such as air-conditioning units should also be addressed as part of triennial planning. We are not supportive of Fresh Energy's suggestions to alter the TRM based on policy goals. The remainder of our Reply Comments address these topics.

## COMMENTS

### I. FRESH ENERGY

Fresh Energy provides several suggested alterations to the TRM, including baseline furnace efficiency, air conditioning systems, gas appliances, high performance windows and transportation measures. Fresh Energy acknowledges that many of its recommendations "are generally addressed in ECO program design and Triennial Plans rather than in the TRM itself."<sup>1</sup> Nevertheless, Fresh Energy asserts that various policy considerations warrant the removal or phase-out of certain measures from the TRM and from utility ECO portfolios. The Company disagrees. The TRM is a technical document intended to support the standardization of energy savings calculations for specific measures, not a policy document.

By statute, the TRM serves as an inventory of the most effective energy conservation programs and technologies. Decisions regarding the inclusion or exclusion of certain technologies in the TRM should be made on a technical basis, considering such factors as a measure's potential energy savings contribution, market penetration, and equipment performance. Policy considerations, such as whether incentives for certain technologies should be "phased out" in favor of others, are not appropriate for the TRM. The Company believes Fresh Energy's comments reflect a fundamental misunderstanding of the purpose of the TRM.

Accordingly, arguments to remove certain measures from the TRM based on policy preferences – such as assertions that a certain measure is "better aligned with Minnesota's greenhouse gas reduction and climate goals"<sup>2</sup> than another – should not be considered an appropriate basis for changes to the TRM. Similarly, it would not be appropriate to require an end to incentives (whether immediate or in the future) for specific measures in this proceeding, as that is a policy decision rather than a technical one.

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<sup>1</sup> Fresh Energy Comments, p.1.

<sup>2</sup> Fresh Energy Comments, p. 9.

The Company thus disagrees with the recommendations to end incentives for air conditioning systems, gas water heaters, gas hearths, gas clothes dryers, gas boilers, and gas furnaces, as well as the proposed “phase out” of gas furnace incentives, which are based on policy, rather than technical considerations. . The question of furnace baselines is a technical one and a valid consideration for the TRM, but the potential removal of furnaces as a tool utilities can use to achieve energy savings is a policy decision and not a reasonable determination to make in what should be a technical proceeding.

Further, the exclusion of a measure from the TRM is not, or at least historically has not been, a deciding factor on whether the measure can be included in utility portfolios. Rather, a utility can propose and support its technical assumptions for that measure in an ECO Triennial proceeding, instead of relying on the TRM. Nor does the presence of a measure in the TRM mean the utility must include it in its ECO portfolio; there are a variety of measures in the TRM which no utility (or only a subset of utilities) includes in its portfolio. One example is cellular shade window coverings, which the Department notes is not currently included in any IOU portfolio.<sup>3</sup> Nor is likely cost-effectiveness a barrier to TRM inclusion: for example, Level 2 electric vehicle chargers are a defined measure in the TRM, but with deemed energy savings of only 61 kWh per year and deemed incremental cost of \$50, utilities may well find it challenging to develop cost-effective incentives to promote the measure. An update to the furnace baseline would significantly reduce the savings from furnaces, possibly to the point that the measure (or utility incentives for it) is no longer cost effective. But this does not mean the measure should be removed from the TRM, any more than low annual savings should be a reason to remove Level 2 chargers.

This is not to say that the Company has changed its position regarding furnace baselines. On the contrary, the Company continues to have serious concerns with the proposed change to furnace baselines and whether the proposed change is adequately supported by the technical evidence available. The Company’s position is simply that the TRM is a technical document, that changes to the TRM should be based on technical and not policy grounds, and that a change to the baseline for any measure is not the same as removing it from the TRM (nor from utility portfolios).

Currently, utility Triennial Plans provide the appropriate forum to consider issues of policy. However, it may be valuable for utilities and stakeholders to engage in a broader forum in which policy matters that affect all utility ECO programming can be

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<sup>3</sup> Proposed Decision, p. 3.

discussed.<sup>4</sup> The Company would support further development of a policy forum if the Department and other stakeholders agree.

## **II. CENTER FOR ENERGY AND THE ENVIRONMENT**

We appreciate CEE's detailed review of supporting technical data and discussions presented as part of their Comments. Below, we provide additional comments regarding specific CEE proposals.

We disagree with adjusting the furnace baseline at this time. While CEE provides detailed support for technical details, we continue to believe that this adjustment is unnecessary given the current federal furnace standards. Further analysis could continue to be reviewed for TRM v.5.1. Delaying this adjustment would allow all related measures, including Air Source Heat Pumps, to be updated at the same time to ensure consistent assumptions are used throughout utility portfolios. This would also provide the ability for TRMAC to review options for income-qualified customers to better reflect that segment. In 2023, Wisconsin chose to keep the low-income baseline at 80 percent AFUE after the Focus on Energy survey found a lower weighted average AFUE for these households than for market rate customers; it is concerning to the Company that the Department has chosen to adjust the baseline based on the same Focus on Energy survey, but declined to make a corresponding adjustment for income qualifying customers.

Finally, we appreciate CEE's suggestion that if utilities can verify the actual efficiency of an existing furnace is below 90 percent AFUE, that the federal minimum standard of 80 percent AFUE should be used. If the baseline is changed, CEE's suggestion may provide a reasonable approach for utilities to present as part of their Triennial Plans. These customers are at risk of being left behind if the baseline moves to 90 percent AFUE. Allowing utilities to claim additional savings for these customers would allow utilities to continue prioritizing and offering larger customer rebates for the replacement of lower efficiency, non-condensing furnaces and ensure larger rebates remain cost-effective under the Minnesota Cost Test. However, we do not believe it is necessary for the Department to make a determination on this approach as part of this docket.

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<sup>4</sup> Historically, such matters have been addressed through issue-specific, time-limited workgroups rather than through any standing process.

## CONCLUSION

We appreciate the ongoing discussion on TRM v.5.0. The Company continues to support our position as detailed in our Comments as well as in the Joint Comments. In addition, we support several of CEE's positions as noted below. The Company supports:

- Maintaining the 80 AFUE baseline for furnaces and boilers, reviewing additional details specific to Minnesota in v.5.1 as discussed as part of the TRMAC process.
- No changes to the air-conditioning measures as supported by the Department and TRMAC in their six-month review on this topic.
- Considering implementing a low-income specific furnace baseline, as sources show that low-income households may be more likely to have a furnace efficiency lower than 90 percent AFUE.
- Consistently applying adjusted baselines throughout the TRM at the same time, specifically in v.5.1 for such measures as air-source heat pumps.

## CERTIFICATE OF SERVICE

I, Victor Barreiro, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped  
with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

**DOCKET No.      E,G999/CIP-18-694**

Dated this 15<sup>th</sup> day of December 2025

/s/

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Victor Barreiro  
Regulatory Administrator

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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
43	Bill	Poppert	info@technologycos.com	Technology North		2433 Highwood Ave St. Paul MN, 55119 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
44	Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024-9583 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
45	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	ECO SPECIAL SERVICE LIST
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47	Laura	Silver	laura.silver@state.mn.us		Department of Commerce	85 7th Place E, Suite 500 St. Paul MN, 55101 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
48	Rick	Sisk	rsisk@trccompanies.com	Lockheed Martin		1000 Clark Ave. St. Louis MO, 63102 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
49	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
50	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
51	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	ECO SPECIAL SERVICE LIST
52	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
53	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
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55	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
56	Cristina	Zuniga	czuniga@otpc.com	Otter Tail Power Company		215 South Cascade Street PO Box 496 Fergus Falls MN, 56538 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST