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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 7th 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 or contact me at 612-330-7974 or 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."¹ 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"² 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.

¹ Fresh Energy Comments, p.1.

² 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.³ 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

³ Proposed Decision, p. 3.

discussed.⁴ 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.

⁴ 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 15th day of December 2025

/s/

Victor Barreiro
Regulatory Administrator

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16	Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.	2377 Union Lake Trl Northfield MN, 55057 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST		
17	Melissa S	Feine	melissa.feine@semcac.org	SEMCAC	PO Box 549 204 S Elm St Rushford MN, 55971 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST		
18	Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST		
19	Karolanne	Foley	karolanne.foley@dairylandpower.com	Dairyland Power Cooperative	PO Box 817 La Crosse WI, 54602-0817 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST		
20	Tyler	Glewwe	tyler.glewwe@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST		
21	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST		
22	Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST		

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
23	Jeffrey	Haase	jhaase@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
24	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
25	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
26	Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency		702 3rd Ave S Virginia MN, 55792 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
27	Martin	Kapsch	martin.kapsch@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
28	Zach	Klabo	zach.klabo@mdu.com	Great Plains Natural Gas Company			Electronic Service		No	ECO SPECIAL SERVICE LIST
29	Deborah	Knoll	dknoll@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
30	Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas		null null, null United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
31	Tina	Koecher	tkoecher@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
32	Martin	Lepak	martin.lepak@aeoa.org	Arrowhead Economic Opportunity		702 S 3rd Ave Virginia MN, 55792 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
33	Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission		1902 6th Ave E Hibbing MN, 55746 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
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

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
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	
37	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service	No	ECO SPECIAL SERVICE LIST	
38	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service	No	ECO SPECIAL SERVICE LIST	
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	
43	Bill	Popert	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	
46	Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501	Electronic Service	No	ECO SPECIAL SERVICE LIST	

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
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	
54	Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis MN, 55402	United States	Electronic Service	No	ECO SPECIAL SERVICE LIST	
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@otpco.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	