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May 1, 2025

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

Dr. Pete Wyckoff
Deputy Commissioner, Division of Energy Resources
Minnesota Department of Commerce
85 Seventh Place East, Suite 280
St. Paul, MN 55101-2198

RE: Natural Gas Energy Conservation and Optimization 2024 Status Report & Associated
Compliance Filings
Docket No. G-008/CI-10-111
Docket No. G-008/CIP-23-95
Docket No. G-008/M-25-___

Dear Executive Secretary and Deputy Commissioner:

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, ("CenterPoint Energy" or the "Company") respectfully submits to the Minnesota Public Utilities Commission ("Commission") and the Minnesota Department of Commerce, Division of Energy Resources ("Department"), its aggregated compliance filing, which includes its *2024 Energy Conservation and Optimization Status Report*; *2024 Demand-Side Management Financial Incentive Report*; *Energy Conservation and Optimization Tracker Report* for the period of January 1, 2024, through December 31, 2024; and its request to increase the Conservation Cost Recovery Adjustment ("CCRA") to \$0.1885 per dekatherm ("Dth"), to become effective October 1, 2025. This filing complies with the Commission's Orders in *In the Matter of the Commission Review of Utility Performance Incentives for Energy Conservation*,¹ Conservation Improvement Program ("CIP")/Energy Conservation and Optimization ("ECO") regulations requiring CenterPoint Energy to submit an annual ECO Status report,² and the Commission's requirement that CenterPoint

¹ Docket No. E,G-999/CI-08-133.

² Minn. R. § 7690.0550.

Energy submit its ECO Adjustment filing annually in conjunction with its ECO Tracker Report and DSM Financial Incentive filing.³

For the sixteenth consecutive year, CenterPoint Energy surpassed its energy savings goal 1,890,592 Dth of first-year energy savings, representing 1.29 percent of its average retail sales and 101 percent of its approved goal for 2024. Program expenditures were \$62,705,528, or 108 percent of the approved 2024 budget, while net benefits under the Minnesota Test were \$198,550,843. Under the mechanism approved by the Commission,⁴ this level of performance qualifies the Company for a financial incentive of \$7,942,034.

CenterPoint Energy was assessed by the Department of Commerce a total of \$767,858 under Minnesota Statute § 216B.241. These assessments are recoverable under Minnesota Statute § 216B.241 through the ECO Tracker mechanism. Combining total assessments, alternative ECO program expenditures in 2024 (\$553,909), and 2024 program expenditures results in total deferred expenses on the ECO Tracker account of \$64,027,295. The Company also requests approval of its 2024 ECO carrying charges. Because the Company's 2024 ECO Tracker account was over-recovered for most of the year, total annual carrying charges accrued in favor of customers. The carrying charges were credited to the ECO Tracker account, reducing the total year-end under-recovered balance. Total annual carrying charges of \$964 were credited to the 2024 ECO Tracker account in the customers favor, resulting in a year-end, ECO Tracker balance of \$23,652,462.⁵

The Commission has ordered CenterPoint Energy to file its ECO Adjustment with its annual ECO Tracker and DSM Financial Incentive filings.⁶ The Company requests approval to increase the CCRA to \$0.1885 per Dth, to go into effect on October 1, 2025. The Company projects this increased CCRA will achieve a near-zero ECO Tracker balance by the end of 2026. Section 4 of this filing describes the Company's CCRA proposal in more detail.

Please address requests to receive a copy of the filing, as well as comments or questions regarding the Status Report, to Martin Kapsch at martin.kapsch@centerpointenergy.com or (612) 321-4606.

Sincerely,

³ *In the Matter of a Petition by CenterPoint Energy, A Division of CenterPoint Energy Resources Corp., for Approval of its 2009 CIP Tracker Account and DSM Financial Incentive*, Docket No. G-008/M-10-416, G-008/M-10-634, Ordering Point 4 (Oct. 11, 2010).

⁴ *In the Matter of Commission Review of Utility Performance Incentives for Energy Conservation*, Docket No. E,G-999/CI-08-133, Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan (Jan. 25, 2024).

⁵ A positive balance indicates an under-recovery and a negative balance indicates an over-recovery.

⁶ *In the Matter of a Petition by CenterPoint Energy, A Division of CenterPoint Energy Resources Corp., for Approval of its 2009 CIP Tracker Account and DSM Financial Incentive*, Docket No. G-008/M-10-416, G-008/M-10-634, Ordering Point 4 (Oct. 11, 2010).

/s/ Martin Kapsch

Martin Kapsch

Senior Regulatory Analyst, Energy Conservation and Optimization Programs

CC: Service List

CENTERPOINT ENERGY
SUMMARY OF FILING
Rule 7829.1300, Subp. 1

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, (“CenterPoint Energy” or the “Company”) submits its *2024 Energy Conservation and Optimization Status Report* and associated filings. In addition to the Status Report, this filing includes a request for approval of the Company’s December 31, 2024, Energy Conservation and Optimization (“ECO”) Tracker balance of \$23,652,462; a request for approval of a 2024 ECO Financial Incentive in the amount of \$7,942,034 (to be credited to the ECO Tracker account upon receipt of approval from the Minnesota Public Utilities Commission); and a request for approval of updates to the Company’s tariff book to incorporate the requested Conservation Cost Recovery Adjustment factor of \$0.01885 per therm.

CENTERPOINT ENERGY
SUMMARY OF FILING
Rule 7829.1300, Subp. 3

- A. The name, address, and telephone number of the utility:

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas,
a Delaware Corporation
505 Nicollet Mall
PO Box 59038
Minneapolis, Minnesota 55402
(612) 321-4324

- B. The name, address, and telephone number of the attorney for the utility:

Jason T. Loos, Associate General Counsel
505 Nicollet Mall
Minneapolis, Minnesota 55402
(612) 321-4410

- C. The date of the filing and the date the proposed rate or service change will take effect:

Date Filed:	May 1, 2025
Effective Dates:	October 1, 2025 (Conservation Cost Recovery Adjustment)
	Upon receipt of Commission approval (Financial Incentive)

- D. The statute the utility believes controls the timeframe for processing the filing:

CenterPoint Energy is unaware of any statute or rule that controls the timeframe for processing this filing.

- E. The signature and title of the utility employee responsible for this filing:

_____/s/_____
Martin A. Kapsch
Senior Regulatory Analyst, Energy Conservation and Optimization Programs
(612) 321-4606

AGGREGATED COMPLIANCE REPORTS OVERVIEW

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, (“CenterPoint Energy” or the “Company”) submits its *2024 Energy Conservation and Optimization Status Report* and associated compliance reports. The purpose of the filing is to report 2024 Energy Conservation and Optimization (“ECO”) project activity, to request approval to allocate the 2024 Financial Incentive to CenterPoint Energy’s ECO Tracker, to update ECO Tracker activity from January 1, 2024, through December 31, 2024, to request approval of the ECO Tracker balance, and to request approval of the Company’s proposed Conservation Cost Recovery Adjustment.

This filing is an aggregation of four compliance reports. The filing is divided into five sections consisting of the following compliance reports and their corresponding attachments:

- Section 1. 2024 Energy Conservation and Optimization Status Report;
- Section 2. 2024 Demand-Side Management Financial Incentive Report;
- Section 3. Energy Conservation and Optimization Tracker Report;
- Section 4. Conservation Cost Recovery Adjustment Proposal; and
- Section 5. Attachments.

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SECTION 1: 2024 ENERGY CONSERVATION AND OPTIMIZATION PROGRAM STATUS REPORT

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, (“CenterPoint Energy” or the “Company”) submits this Status Report on its Energy Conservation and Optimization (“ECO”) programs in compliance with Minnesota Department of Commerce (“Department”) Rules and the Commissioner’s Decisions. This report covers the 2024 ECO year, January 1 through December 31. The report is divided into five sections:

- I. Summary of Accomplishments
- II. Minority and Women Business Enterprise Vendors
- III. Update of Program Modifications
- IV. Compliance Overview
- V. 2024 ECO Results

Summary of Accomplishments

CenterPoint Energy's commitment to helping its customers achieve cost-effective energy savings was the driving force behind the Company's successful 2024 ECO performance. The residential programs overcame numerous challenges, including inflation and its impacts on project costs. The Company believes Inflation Reduction Act tax credits helped support residential HVAC equipment (including air source heat pumps) and weatherization participation in 2024.⁷ There were also more limited investments in Commercial and Industrial ("C&I") properties than in some previous years. Additionally, since 2024 was the first year of a new triennial period, some program launches were delayed as new implementers were onboarded. Nevertheless, the Company met its portfolio-wide energy savings goal. Similar to 2023, in 2024, a combination of residential insulation and new construction projects and the completion of multi-year C&I projects contributed to this success.

In 2024, CenterPoint Energy began implementing its *2024-2026 Triennial Plan*, which introduced new ECO programs and services and expanded access to some existing programs.⁸ As a result, the Company achieved a record sixteen consecutive years of surpassing its energy savings goal 1,890,592 dekatherms ("Dth"), representing 1.29 percent of CenterPoint Energy's average retail sales, or 1 percent above goal. To achieve these energy savings, 2024 ECO program expenditures were \$62,705,528, or 108 percent of the approved budget. Overall, the cost per Dth of first-year energy savings was \$33.17 as compared to the planned \$30.84, or 8 percent less cost-effective than planned. When lifetime savings are considered, the Company calculates the average per Dth program cost was \$2.49.

The overall ECO portfolio, as well as the residential, C&I, and Efficient Fuel Switching ("EFS") segments, was cost-effective from the utility, societal, participant, and Minnesota test perspectives. Several programs in the residential and C&I segments performed especially well, including the Home Insulation Rebates program, which achieved energy savings of 55,828 Dth, or 166 percent of goal. The Home Insulation Rebates program's success can largely be attributed to higher rebate amounts as compared to the previous triennial. Additionally, the C&I Custom Rebates program exceeded its energy savings goal with energy savings reaching 239 percent of goal in 2024. The strong performance of the C&I Custom Rebates program was the result of two large multi-year projects that were completed in 2024.

Regarding the Low-Income segment, Minnesota statute requires gas utilities to spend the equivalent of at least 1.0 percent of gross operating revenue ("GOR") from its residential customers on conservation programs that directly serve the needs of low-income customers. In 2024, the Company far surpassed this requirement by spending \$10,313,474 on dedicated low-income ECO programs, or the equivalent of 1.42 percent of GOR from its residential customers.

⁷ CenterPoint Energy shared information on tax credits with trade allies. The Company is aware that trade allies highlighted tax credits in conversations with customers.

⁸ *In the Matter of CenterPoint Energy's 2024-2026 Natural Gas Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-23-95, Compliance Filing (Jan. 26, 2024)

Total portfolio spending for the benefit of CenterPoint Energy's low-income customers, when low-income spending from hybrid market-rate/low-income programs is included, was \$11,428,863 (or 18.2 percent of total ECO spending) and was equivalent to 1.57 percent of GOR from residential customers. Despite the delayed rollouts of some low-income programs (the Low-Income Rental Efficiency program changed vendors, and the Homeowner Efficiency Re-do Opportunity program and Low-Income Support and Awareness program were brand new programs in 2024 that took time to launch), the Low-Income segment still nearly achieved its energy savings goal with 36,652 Dth, or 97 percent of its savings goal. The Low-Income Weatherization, Low-Income Free Heating System Tune-Up, and Low-Income Multi-Family Building Efficiency programs performed particularly well, exceeding their energy savings goals by 10 percent, 18 percent, and 65 percent, respectively.

The Residential segment fell short of its energy savings goal with 595,919 Dth, or 91 percent of goal. The reasons for this shortfall include proposing higher participation goals to offset a reduction in energy savings per unit for many popular measures (e.g., 96% efficient furnaces, 91% efficient boilers), as well as the delayed relaunch of the DIY program as it transitioned to a new program vendor. However, while the Residential segment did not meet its energy savings goal, the Home Efficiency Rebates EFS program's first year was successful, significantly exceeding goal with the program achieving 43,473 Dth, or 555 percent of its goal.

CenterPoint Energy is proud of its 2024 ECO accomplishments. The Company continues to demonstrate its commitment to helping its customers achieve cost-effective energy savings, contribute to Minnesota's highly effective natural gas energy efficiency programs, and produce economic benefits.⁹ Looking ahead to 2025, and having now launched all programs, CenterPoint Energy is eager to build upon its 2024 successes. However, the Company anticipates challenges in 2025, including a shortage of new construction projects, a lack of large C&I projects, and potential political and economic uncertainties (e.g., the continuation of federal programs, consumer spending on energy efficiency projects) affecting customer investments in homes and businesses. The Company is proactively taking steps to reach customers and connect them with programs and services that meet their needs.

⁹ American Council for an Energy Efficient Economy. The 2025 State Energy Efficiency Scorecard, available at <https://www.aceee.org/state-policy/scorecard> (last visited April 8, 2025).

Minority and Women Business Enterprise Vendors

CenterPoint Energy supports efforts to promote diversity in the energy and energy efficiency workforces. The Company recognizes the economic importance of diverse suppliers such as minority-owned and women-owned business enterprises (“MWBE”)¹⁰ to the Company’s business, to the economies of the states where CenterPoint Energy operates, and to the communities the Company serves. To increase awareness of the importance of diversity and transparency about the businesses that support CenterPoint Energy’s Minnesota ECO programs, the Company provides the following information about the diversity of its ECO vendors.

Total 2024 Minnesota ECO Spend	\$62,705,528
Vendor Spend ¹¹	\$17,911,675
MWBE Vendor Spend	\$1,901,791
MWBE Spend as Percent of Vendor Spend¹²	10.6%

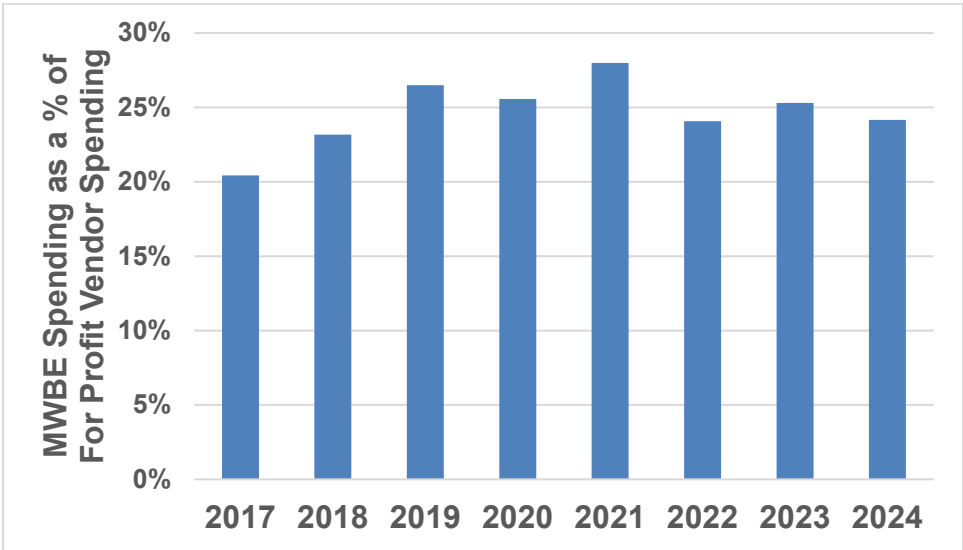
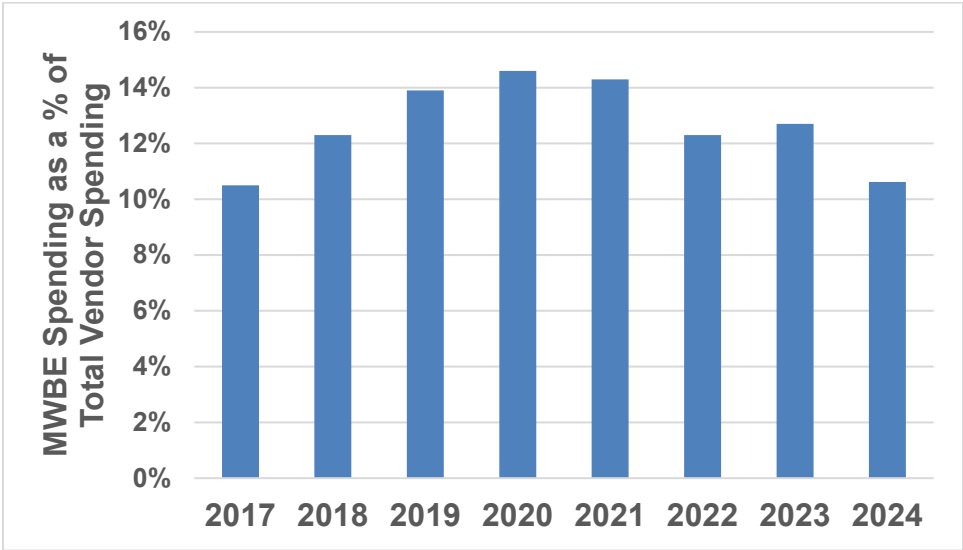
Between 2023 and 2024, MWBE spending fell from 12 percent of total vendor spending to 10 percent. If non-profit entities are excluded from the calculation, vendor spending on MWBEs decreases from 25 percent of the Company’s remaining Minnesota ECO vendor spending in 2023 to 24 percent in 2024. Despite MWBE vendor spending declining as a share of vendor spending, MWBE spending in 2024 was the highest yearly dollar amount in the 2017-2024 timeframe. The reason for these divergent results between the charts shown below are that in 2024 there were significant increases in non-profit spending in the low-income programs.

¹⁰ CenterPoint Energy defines minority-owned and women-owned business enterprises per the guidelines of the National Minority Supplier Development Council and the Women’s Business Enterprise National Council.

¹¹ The Company included in “vendor expenses” all ECO expenses made to business entities in return for services. Vendor spending includes, for example, payments to external project implementers and various marketing and advertisement firms CenterPoint Energy contracts with for energy efficiency promotions. Vendor spending does not include such things as customer or trade ally incentives, fees for membership in energy efficiency organizations (e.g., the Midwest Energy Efficiency Alliance), or various small expenses (e.g., business meals) that the Company does not track by vendor.

¹² The Company notes that \$10,040,342, or 56.1% percent of its vendor spend, went to non-profit entities; non-profit entities cannot qualify as MWBEs under the definition CenterPoint Energy uses.

2017-2024 Minority and Women Business Enterprise Minnesota ECO Spending



Update of Program Modifications

CenterPoint Energy provides the following information regarding the formal and informal modifications to *CenterPoint Energy's Approved 2024-2026 Energy Conservation and Optimization ("ECO") Triennial Plan* that were made or approved in 2024 or had components that went into effect in 2024.¹³

Formal Modifications

C&I Heating and Water Heating Energy Savings and Rebate Tier

On May 3, 2024, the Deputy Commissioner approved CenterPoint Energy's March 15, 2024, request to modify the C&I Heating and Water Heating program by revising the commercial boiler energy savings algorithms and adding a new rebate tier.¹⁴ The proposed updates were in response to Department of Energy amended minimum efficiency standards for commercial boilers.¹⁵ Additionally, new participation and energy savings goals and budgets were approved for the C&I Heating and Water Heating program to account for the updated energy savings per measure and new rebate tier.

Residential Heating Equipment Rebate Amounts

On December 2, 2024, the Deputy Commissioner approved CenterPoint Energy's October 1, 2024, request to modify the Home Efficiency Rebates ("HER") program's rebate levels.^{16 17} Beginning January 1, 2025, the HER program's ASHP rebate increased to \$1,100, while the 96% annual fuel utilization efficiency ("AFUE") furnace and 92% AFUE furnace rebate levels decreased to \$400 and \$200, respectively. The HER program retained its \$1,000 rebate for 97% AFUE furnaces. New participation and energy savings goals and budgets were approved for the HER program to account for the updated rebate amounts. Additionally, higher

¹³ The Deputy Commissioner requires utilities to include in their annual status reports a description of all program modifications and changes not requiring Deputy Commissioner approval in order to keep the Department and other interested parties informed of their activities. *In the Matter of CenterPoint Energy's 2024-2026 Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-23-95, *et al.*, Deputy Commissioner Decision, p. 276 (December 1, 2023). In this section, CenterPoint Energy also describes any modifications requiring Deputy Commissioner approval.

¹⁴ See *In the Matter of CenterPoint Energy's 2024-2026 ECO Triennial Plan Rebate Changes*, Docket No. G-008/CIP-23-95, DOC Decision, (May 3, 2024).

¹⁵ Department of Energy Issues a Final Rule; Correction Notice Pertaining to Standards for Commercial Packaged Boilers. (September 11, 2023) Retrieved on January 6, 2025, from: <https://content.govdelivery.com/accounts/USEERE/bulletins/36fb2bf>

¹⁶ CenterPoint Energy's October 1, 2024, *Program Modification* was filed in accordance with the Department's March 21, 2024, *Decision, In the Matter of CenterPoint Energy's 2024-2026 ECO Triennial Plan Rebate Changes*. In its *Decision*, the Department directed CenterPoint Energy to "propose revised air source heat pump and natural gas furnace rebates that reflect the levels recommended by stakeholders in their February 29 written comments."

¹⁷ See *In the Matter of CenterPoint Energy's 2024-2026 ECO Triennial Plan Rebate Changes*, Docket No. G-008/CIP-23-95, DOC Decision, (December 2, 2024).

incremental costs were approved for 92%, 96%, and 97% AFUE furnaces to better reflect the market and incremental cost data the Company compiled.

In 2025, several trade allies expressed confusion and dissatisfaction with the reduced furnace rebates that took effect at the beginning of the year. However, a combination of proactive communication by the Company in 2024 and educational support in 2025 by the program implementation team have minimized issues to date.

Modifications Not Requiring Formal Approval

Low-Income Outreach and Marketing Campaigns

On January 22, 2024, CenterPoint Energy provided a Courtesy Notification to the Department's ECO, Low-Income Home Energy Assistance Program ("LIHEAP," or "EAP"), and Weatherization Assistance Program ("WAP") teams regarding the Low-Income Free Heating System Tune-Up (Stay Safe, Stay Warm ["SSSW"]) program's 2024 outreach campaign. The SSSW campaign utilized the Company's full EAP recipient list, including customers whose EAP funds were paid to electric and water utilities, to target low-income customers with outbound calls to schedule SSSW appointments. EAP customers are pre-qualified for the SSSW program.

On February 22, 2024, CenterPoint Energy provided a Courtesy Notification to the Department's ECO, EAP, and WAP teams regarding the Low-Income Weatherization ("LIW") program's 2024 outreach and marketing campaign. The LIW campaign utilized the Company's full EAP recipient list, including customers whose EAP funds are paid to electric and water utilities, to target low-income customers with letters and postcards encouraging them to sign up for LIW. EAP customers are pre-qualified for the LIW program.

New Normal Campaign Timeline Extension

On January 26, 2024, CenterPoint Energy provided a Courtesy Notification to the Department to extend the New Normal Campaign through 2024 (or 2025 for customers who began participating in 2024). The New Normal Campaign offers bonus rebates to C&I customers in the city of Minneapolis. The timeline extension gives participating customers additional time to complete their participation in the New Normal program, which was warranted due to delays caused by factors such as supply chain disruptions. Bonus Rebates through the New Normal program in 2024 are reported in the C&I Heating and Water Heating program section.

C&I Heating and Water Heating Bonus Rebates

On March 8, 2024, CenterPoint Energy provided a Courtesy Notification to the Department regarding limited-time bonus rebates and trade ally incentives in the C&I Heating and Water Heating program. Between April 1, 2024, and July 1, 2024, bonus rebates and trade ally incentives were offered for boiler tune-ups, steam traps, and industrial process equipment tune-ups in the following amounts (as also listed in the Company's ECO plan):

- Customer rebates for steam traps increased from 35% to 40% of costs.
- Customer rebates for boiler tune-ups increased from 25% to 35% of costs.

- Customer rebates for process and industrial equipment tune-ups increased from 25% to 35% of costs.
- Trade ally incentives for heating system boiler tune-ups doubled from \$10 to \$20 per tune-up.
- Trade ally incentives for heating system steam traps doubled from \$5 to \$10 per trap.
- Trade ally incentives for industrial equipment tune-ups increased from \$100 to \$150 per tune-up.

The Courtesy Notification also corrected an error in CenterPoint Energy's ECO plan. The standard amount for a trade ally incentive for industrial equipment tune-ups is \$100 per tune-up, not \$50 per tune-up as incorrectly stated in the Company's ECO plan.

Home Energy Squad Co-Pay Discount

On November 11, 2024, CenterPoint Energy provided a Courtesy Notification to the Department regarding updates to the Home Energy Squad ("HES") program's city co-pay discount policy. Beginning in 2025, HES is willing to incur the costs of co-pay discounts in cities that promote the co-pay discount to their residents. The purpose of this arrangement is to simplify and streamline the administration of the HES co-pay discount during the current triennial period. This policy change is internal to the Company and does not require changes to existing arrangements with the HES program implementers.

Benchmarking Technical Support

On December 16, 2024, CenterPoint Energy provided a Courtesy Notification to the Department regarding updates to the Benchmarking Services and Certification Assistance program. For 2025-2026, the Company is hiring a vendor to provide technical support related to an anticipated increase in Energy Data Portal usage due to statewide benchmarking requirements for Class 1 and Class 2 buildings in certain counties and municipalities. The vendor expenses will be incurred by the Benchmarking Services and Certification Assistance program and are not expected to lead to budget overruns.

Compliance Overview

Energy Savings Goals (Minn. Stat. § 216B.241, subd. 1c)

CenterPoint Energy's approved 2024 energy savings goal represents 1.28 percent of the Company's ¹⁸ The Company surpassed the approved 2024 energy savings goal by 16,375 Dth, achieving energy savings equivalent to 1.29 percent of CenterPoint Energy's approved three-year-average weather-normalized energy sales excluding energy sales to ECO-exempt customers.

Table 1. Compliance with Annual Energy Savings Goal

Average Weather-Normalized Energy Sales (2020-2022)	146,689,037 Dth
2024 Energy Savings Goal	1,874,218 Dth
2024 ECO Energy Savings Goal - Percent of Average Weather-Normalized Energy Sales	1.28%
2024 Actual Energy Savings	1,890,592 Dth
2024 ECO Energy Savings - Percent of Average Weather-Normalized Energy Sales	1.29%

Low-Income Spending Requirement (Minn. Stat. § 216B.241, subd. 7)

Minnesota Statutes § 216B.241, subd. 7, requires each gas utility to annually spend at least 1.0 percent of its most recent three-year-average residential GOR on conservation programs that directly serve the needs of low-income customers. In 2024, CenterPoint Energy spent a total of **\$11,428,863** on low-income customers participating in ECO, representing 1.57 percent of the Company's three-year-average GOR from residential customers.¹⁹

¹⁸ See Minn. Stat. § 216B.241, subd. 1c(d).

¹⁹ Consistent with how ECO energy savings goals are calculated for Triennial Plan filings, the Company calculated its three-year average GOR from residential customers using the three most recent years prior to filing *CenterPoint Energy's 2024-2026 Energy Conservation and Optimization Plan*. See CenterPoint Energy's Approved 2024-2026 Energy Conservation and Optimization Plan, Docket No. G-008/CIP-23-95, p. 8 (Jan. 26, 2024). The Company calculated applicable minimum low-income spending amounts using the methodology approved by the Deputy Commissioner in 2015. See *In the Matter of CenterPoint Energy's Conservation Improvement Program 2013 Status Report*, Docket No. G-008/CIP-12-564.02, Deputy Commissioner Decision, Ordering Point 3 (Jan. 9, 2015).

Table 2. Compliance with Low-Income Spending Requirement

2020 GOR from Residential Customers	\$560,201,800
2021 GOR from Residential Customers	\$664,791,000
2022 GOR from Residential Customers	\$954,055,200
2020-2022 Average GOR from Residential Customers ²⁰	\$726,349,333
Statutory Spending Factor	1.0%
Statutory Minimum Low-Income Spending	\$7,263,493
2024 Spending (Dedicated Low-Income Programs)	\$10,313,474
Spending as Percent of Residential GOR (Dedicated Low-Income Programs ONLY)	1.42%
2024 Low-Income Spending in the Energy Design Assistance (EDA) Program	\$348,167
2024 Low-Income Spending in the Home Energy Reports Program	\$767,222
2024 Total Low-Income Spending (Dedicated Low-Income Programs, EDA, and Home Energy Reports)	\$11,428,863
2024 Low-Income Spending as Percent of Residential GOR (Dedicated Low-Income Programs, EDA, and Home Energy Reports)	1.57%
Other 2024 Spending on Low-Income Customers in the Residential Market Programs	\$489,571

Pre-Weatherization Spending Cap (Minn. Stat. § 216B.241, subd. 7(f))

Minnesota Statutes § 216B.241, subd. 7(f) established that the maximum utilities may spend on pre-weatherization measures through ECO should be 15 percent of total ECO low-income spending. The table below shows CenterPoint Energy's compliance with this pre-weatherization spending cap.

²⁰ Annual GOR from residential customers figures come from the Company's 2020-2022 Gas Jurisdictional Annual Reports, Page G-38 (Revenue Corresponding to Sales for Residential With Heating and Residential Without Heating).

Table 3. Compliance with Pre-Weatherization Spending Cap

2024 ECO Spending in Dedicated Low-Income Programs	\$10,313,474
2024 Pre-Weatherization Spending Cap	\$1,547,021
2024 Pre-Weatherization Spending	\$653,434
2024 Pre-Weatherization Spending as Percent of Low-Income Spending	6.3%

R&D Spending Cap (Minn. Stat. § 216B.241, subd. 2(e))

Minnesota Statutes § 216B.241, subd. 2(e) established that the maximum utilities may spend on R&D through ECO should be 10 percent of total ECO spending. The table below shows CenterPoint Energy's compliance with this R&D spending cap. For descriptions of the Company's 2024 R&D activities, see the description of the Analysis, Evaluation, & Project Development project included in the 2024 ECO Results section of this Status Report.

Table 4. Compliance with Research and Development Spending Cap

2024 Total ECO Spending	\$62,705,528
2024 R&D Spending Cap	\$6,270,553
2024 Total R&D Spending	\$181,750

Distributed and Renewable Generation Cap (Minn. Stat. § 216B.2411, subd. 1(a))

Minnesota Statutes § 216B.2411, subd. 1(a), allow utilities to spend up to five percent of their total ECO spending on distributed and renewable generation projects. CenterPoint Energy did not expend funds on any such projects in 2024.

Heat Pump Assessments

In the Department's *Decision*, Order Point 13g(i-ii), the Deputy Commissioner directed CenterPoint Energy to "include its reporting on assessments of cold climate air source heat pumps ["ccASHP"] and heat pump water heaters ["HPWH"] as part of its ECO Status Reports," as well as its "assessment of ductless air source heat pumps ["ductless ASHP"] as part of its ECO Status Reports."²¹ CenterPoint Energy discussed these technologies internally and considered, among other factors, the measures' energy savings potential, performance and cost-effectiveness, how the measures could be integrated with the Company's gas measures, and the current state of the market and customer demand.

CenterPoint Energy currently rebates ccASHPs if the program requirements are met for the standard ducted ASHP rebate. Additionally, in 2025, the Company is now offering customers a

²¹ See *In the Matter of CenterPoint Energy's 2024-2026 Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-23-95, Decision, p. 281 (Dec. 1, 2023).

higher rebate (\$1,100 now, as compared to \$500 in 2024) for ducted ASHPs following the approval of the Company's October 1, 2024, program modification.²²

CenterPoint Energy may consider a ductless ASHP rebate for its 2027-2029 ECO plan, given the measure's energy savings potential, especially for customers with high efficiency gas boilers who lack ductwork. If the Company proposed such a rebate, it would expect participants to pair the ductless ASHP with a new or existing high efficiency gas boiler (or furnace) to receive a rebate, which is consistent with the program requirement for CenterPoint Energy's ducted ASHP rebate. CenterPoint Energy expects the ductless ASHP would operate mainly during the shoulder months, with the gas system being the primary heating source during the coldest months of the year.

Lastly, regarding HPWHs, CenterPoint Energy is reluctant to propose a HPWH rebate at this time. The Company's concerns include the HPWH's size and space requirements being barriers for customers in smaller homes with more space constraints, gas water heaters taking less space than a HPWH, the potential for customer dissatisfaction due to HPWHs not heating water instantaneously like tankless gas water heaters, a current lack of customer demand, and cost-effectiveness concerns when comparing HPWHs to gas water heaters. However, the Company will continue to monitor the HPWH market.

Implementation of the Energy Conservation and Optimization Act in Support of the Inflation Reduction Act of 2022

In 2023, the Minnesota Public Utilities Commission directed utilities to "maximize the benefits of the Inflation Reduction Act ("IRA") in future resource acquisitions and requests for proposals in the planning phase, petitions for cost recovery through riders and rate cases, resource plans, gas resource plans, integrated distribution plans, and Natural Gas Innovation Act innovation plans. In such filings, utilities shall discuss how they plan to capture and maximize the benefits from the Act, and how the Act has impacted planning assumptions including (but not limited to) the predicted cost of assets and projects and the adoption rates of electric vehicles, distributed energy resources, and other electrification measures. Reporting shall continue until 2032."²³

In 2024, CenterPoint Energy continued incorporating information about IRA incentives into its marketing materials and dedicated webpages. This included thumbnails and links to ENERGY STAR® guidance on available IRA tax credits. The Company also continued educating its HVAC contractor network about IRA incentives and encouraged them to raise customer awareness of the funding opportunities for energy efficiency improvements. To the extent that information was available, the Company considered IRA incentives when designing its programs for the 2024-2026 ECO Triennial Plan to enable customers to leverage both ECO and

²² See *In the Matter of CenterPoint Energy's 2024-2026 ECO Triennial Plan Rebate Changes*, Docket No. G-008/CIP-23-95, DOC Decision, (Dec. 2, 2024).

²³ *In the Matter of a Joint Investigation into the Impacts of the Federal Inflation Reduction Act*, Docket No.E,G-999/CI-22-624, Ordering Point 1 (Sept. 12, 2023).

IRA funds for their projects. The Company's energy efficiency programs are designed with flexibility to be modified and realigned with non-utility programs to enable customers to maximize rebates and incentives to reduce the initial purchase price of high efficiency appliances.

CenterPoint Energy continues to consider reporting project level information on projects that utilize both utility and IRA rebate programs. This may potentially occur after the IRA Home Energy Rebates programs have launched and if the Company and the Department of Commerce can coordinate on program participation.²⁴

²⁴ CenterPoint Energy is still considering other ways to collect information on IRA program participation. However, the other methods explored seem unlikely to produce usable data about participation in IRA programs. For example, requesting information from customers regarding their IRA tax credit participation through rebate applications was considered but ultimately rejected. Even if a trade ally were to supply this information about their customers, the time when a customer participates in CenterPoint Energy programs (i.e., the calendar year the appliance is installed) is not aligned with when the customer files their tax return and claims a tax credit (i.e., the calendar year after the appliance is installed), which poses a challenge for reporting.

2024 ECO Results²⁵

The information provided in the following tables satisfies the requirements of Minnesota Rules § 7690.0550.

2024 Program Summary

Summary	Budget	Participation	Energy Saved (Dth)	Demand Energy Saved (Dth)
Residential Market Segment				
2024 Goal	\$33,624,114	323,726	653,418	6,534
2024 Actual	\$34,814,360	417,168	595,919	5,959
Variance	\$1,190,247	93,442	(57,499)	(575)
Low-Income Market Segment				
2024 Goal	\$8,305,336	6,026	37,803	378
2024 Actual	\$10,283,585	3,616	36,652	367
Variance	\$1,978,248	(2,410)	(1,151)	(12)
C&I Market Segment				
2024 Goal	\$10,889,373	9,709	1,174,456	11,745
2024 Actual	\$11,040,915	9,215	1,214,473	12,145
Variance	\$151,542	(494)	40,017	400
Other Programs				
2024 Goal	\$4,378,545	200	0	0
2024 Actual	\$3,810,721	210	0	0
Variance	(\$567,824)	10	0	0
EFS Programs				
2024 Goal	\$608,338	689	8,540	85
2024 Actual	\$2,755,947	1,786	43,548	435
Variance	\$2,147,610	1,097	35,007	350
Total ECO				
2024 Goal	\$57,805,705	340,350	1,874,218	18,742
2024 Actual	\$62,705,528	431,995	1,890,592	18,906
Variance	\$4,899,823	91,645	16,375	164

²⁵ Tables included in this section may not sum to the exact totals provided due to rounding.

2024 Budget Summary

Program	Budget	Actual Spending	Difference	Percent Difference
Residential Market Segment Programs				
Home Efficiency Rebates	\$17,035,150	\$15,754,074	(\$1,281,076)	-7.5%
DIY Home Efficiency	\$929,285	\$291,715	(\$637,570)	-68.6%
Home Insulation Rebates	\$2,782,625	\$3,514,259	\$731,634	26.3%
Home Energy Reports	\$1,652,238	\$1,849,165	\$196,926	11.9%
Home Energy Squad	\$2,965,151	\$2,786,134	(\$179,016)	-6.0%
High-Efficiency Home	\$7,031,750	\$9,723,868	\$2,692,118	38.3%
New Home Construction Rebates	\$650,620	\$371,731	(\$278,889)	-42.9%
Energy Efficiency Kits	\$426,313	\$463,018	\$36,706	8.6%
Residential Code Compliance Support	\$150,982	\$60,395	(\$90,587)	-60.0%
Subtotal:	\$33,624,114	\$34,814,360	\$1,190,247	3.5%
Low-Income Market Segment Programs				
Low-Income Weatherization	\$3,962,192	\$7,022,490	\$3,060,298	77.2%
Low-Income Rental Efficiency	\$1,089,758	\$903,077	(\$186,681)	-17.1%
Homeowner Efficiency Redo Opportunity	\$1,413,092	\$457,593	(\$955,499)	-67.6%
Low-Income Free Heating System Tune-Up	\$163,563	\$206,214	\$42,652	26.1%
Non-Profit Affordable Housing Rebates	\$703,373	\$609,436	(\$93,937)	-13.4%
Low-Income Multi-Family Building Efficiency	\$650,234	\$835,546	\$185,312	28.5%
Low-Income Support and Awareness	\$323,125	\$249,228	(\$73,897)	-22.9%
Subtotal:	\$8,305,336	\$10,283,585	\$1,978,248	23.8%
C&I Market Segment Programs				
Commercial Foodservice Equipment Rebates	\$791,191	\$733,056	(\$58,135)	-7.3%
C&I Heating and Water Heating Rebates	\$3,313,383	\$3,768,011	\$454,628	13.7%
C&I Custom Rebates	\$1,915,416	\$2,418,808	\$503,392	26.3%
C&I Audit Services	\$701,962	\$630,888	(\$71,074)	-10.1%
Energy Design Assistance	\$1,778,875	\$1,115,849	(\$663,026)	-37.3%
Commercial Code Compliance Support	\$40,861	\$223,394	\$182,533	446.7%
Industrial Process & Commercial Efficiency	\$324,515	\$343,741	\$19,226	5.9%
C&I Training and Education	\$143,295	\$123,153	(\$20,142)	-14.1%
Benchmarking Services and Certification Assistance	\$173,371	\$180,357	\$6,986	4.0%
Recommissioning Study and Rebates	\$237,057	\$165,135	(\$71,922)	-30.3%
Multi-Family Building Efficiency	\$1,469,447	\$1,338,523	(\$130,924)	-8.9%
Subtotal:	\$10,889,373	\$11,040,915	\$151,542	1.4%

Program	Budget	Actual Spending	Difference	Percent Difference
Other Programs				
Analysis, Evaluation, & Program Development	\$1,487,000	\$1,209,901	(\$277,099)	-18.6%
Energy Efficiency Marketing & Awareness	\$1,002,000	\$953,633	(\$48,367)	-4.8%
Planning & Regulatory Affairs	\$250,000	\$251,514	\$1,514	0.6%
EZ Pay On-Bill Loan	\$518,224	\$274,352	(\$243,872)	-47.1%
MN ETA	\$1,121,321	\$1,121,321	\$0	0.0%
Subtotal:	\$4,378,545	\$3,810,721	(\$567,824)	-13.0%
EFS Programs				
Home Efficiency Rebates	\$476,400	\$2,700,497	\$2,224,097	466.9%
Home Energy Squad	\$60,563	\$25,561	(\$35,002)	-57.8%
High-Efficiency Home	\$51,313	\$0	(\$51,313)	-100.0%
New Home Construction Rebates	\$0	\$0	\$0	N/A
Low-Income Weatherization	\$0	\$0	\$0	N/A
Low-Income Rental Efficiency	\$0	\$0	\$0	N/A
Homeowner Efficiency Redo Opportunity	\$20,063	\$0	(\$20,063)	-100.0%
Non-Profit Affordable Housing Rebates	\$0	\$29,889	\$29,889	N/A
Energy Design Assistance	\$0	\$0	\$0	N/A
Subtotal:	\$608,338	\$2,755,947	\$2,147,610	353.0%
ECO Total	\$57,805,705	\$62,705,528	\$4,899,823	8.5%

2024 Energy Savings Summary

Program	Goal Energy Savings (Dth)	Actual Energy Savings (Dth)	Difference	Percent Difference	Lifetime Energy Savings (Dth)
Residential Market Segment Programs					
Home Efficiency Rebates	296,816	259,268	(37,548)	-12.7%	4,881,163
DIY Home Efficiency	44,483	1,313	(43,170)	-97.0%	12,273
Home Insulation Rebates	33,732	55,828	22,096	65.5%	1,116,562
Home Energy Reports	101,481	103,616	2,135	2.1%	310,849
Home Energy Squad	34,960	17,711	(17,249)	-49.3%	162,541
High-Efficiency Home	105,370	127,006	21,636	20.5%	2,540,116
New Home Construction Rebates	14,843	10,752	(4,091)	-27.6%	164,709
Energy Efficiency Kits	21,733	20,424	(1,308)	-6.0%	145,092
Residential Code Compliance Support	0	0	0	N/A	0
Subtotal:	653,418	595,919	(57,499)	-8.8%	9,333,304
Low-Income Market Segment Programs					
Low-Income Weatherization	16,285	17,852	1,567	9.6%	344,640
Low-Income Rental Efficiency	2,846	2,399	(447)	-15.7%	36,236
Homeowner Efficiency Redo Opportunity	6,746	0	(6,746)	-100.0%	0
Low-Income Free Heating System Tune-Up	1,828	2,149	321	17.6%	4,299
Non-Profit Affordable Housing Rebates	2,708	2,046	(662)	-24.4%	38,410
Low-Income Multi-Family Building Efficiency	7,389	12,205	4,816	65.2%	150,606
Low-Income Support and Awareness	0	0	N/A	N/A	N/A
Subtotal:	37,803	36,652	(1,151)	-3.0%	574,190
C&I Market Segment Programs					
Commercial Foodservice Equipment Rebates	49,005	49,456	451	0.9%	602,796
C&I Heating and Water Heating Rebates	730,413	660,724	(69,689)	-9.5%	4,527,879
C&I Custom Rebates	135,005	322,917	187,912	139.2%	6,733,174
C&I Audit Services	8,538	1,621	(6,917)	-81.0%	16,368
Energy Design Assistance	155,772	93,991	(61,781)	-39.7%	1,879,822
Commercial Code Compliance Support	0	0	0	N/A	0
Industrial Process & Commercial Efficiency	14,326	8,905	(5,421)	-37.8%	100,148
C&I Training and Education	1,612	2,428	816	50.6%	12,141
Benchmarking Services and Certification Assistance	0	0	N/A	N/A	N/A
Recommissioning Study and Rebates	15,730	12,198	(3,533)	-22.5%	85,383
Multi-Family Building Efficiency	64,055	62,234	(1,821)	-2.8%	527,852
Subtotal:	1,174,456	1,214,473	40,017	3.4%	14,485,562

Program	Goal Energy Savings (Dth)	Actual Energy Savings (Dth)	Difference	Percent Difference	Lifetime Energy Savings (Dth)
Other Programs					
Analysis, Evaluation, & Program Development	0	0	0	N/A	N/A
Energy Efficiency Marketing & Awareness	0	0	0	N/A	N/A
Planning & Regulatory Affairs	0	0	0	N/A	N/A
EZ Pay On-Bill Loan	0	0	0	N/A	N/A
Minnesota Efficient Technology Accelerator	0	0	0	N/A	N/A
Subtotal:	0	0	0	N/A	N/A
EFS Programs					
Home Efficiency Rebates	7,837	43,473	35,636	454.7%	823,852
Home Energy Squad	0	0	0	N/A	N/A
High-Efficiency Home	603	0	(603)	-100.0%	0
New Home Construction Rebates	0	0	0	N/A	0
Low-Income Weatherization	0	0	0	N/A	0
Low-Income Rental Efficiency	0	0	0	N/A	0
Homeowner Efficiency Redo Opportunity	101	0	(101)	-100.0%	0
Non-Profit Affordable Housing Rebates	0	74	74	N/A	1,487
Energy Design Assistance	0	0	0	N/A	0
Subtotal:	8,540	43,548	35,007	409.9%	825,339
ECO Total	1,874,218	1,890,592	16,375	0.9%	25,218,396

2024 Demand Savings Summary

Program	Goal Demand Savings (Dth)	Actual Demand Savings (Dth)	Difference	Percent Difference
Residential Market Segment Programs				
Home Efficiency Rebates	2,968	2,593	(375)	-12.7%
DIY Home Efficiency	445	13	(432)	-97.0%
Home Insulation Rebates	337	558	221	65.5%
Home Energy Reports	1,015	1,036	21	2.1%
Home Energy Squad	350	177	(172)	-49.3%
High-Efficiency Home	1,054	1,270	216	20.5%
New Home Construction Rebates	148	108	(41)	-27.6%
Energy Efficiency Kits	217	204	(13)	-6.0%
Residential Code Compliance Support	0	0	0	N/A
Subtotal:	6,534	5,959	(575)	-8.8%
Low-Income Market Segment Programs				
Low-Income Weatherization	163	179	16	9.6%
Low-Income Rental Efficiency	28	24	(4)	-15.7%
Homeowner Efficiency Redo Opportunity	67	0	(67)	-100.0%
Low-Income Free Heating System Tune-Up	18	21	3	17.6%
Non-Profit Affordable Housing Rebates	27	20	(7)	-24.4%
Low-Income Multi-Family Building Efficiency	74	122	48	65.2%
Low-Income Support and Awareness	0	0	0	N/A
Subtotal:	378	367	(12)	-3.0%
C&I Market Segment Programs				
Commercial Foodservice Equipment Rebates	490	495	5	0.9%
C&I Heating and Water Heating Rebates	7,304	6,607	(697)	-9.5%
C&I Custom Rebates	1,350	3,229	1,879	139.2%
C&I Audit Services	85	16	(69)	-81.0%
Energy Design Assistance	1,558	940	(618)	-39.7%
Commercial Code Compliance Support	0	0	0	N/A
Industrial Process & Commercial Efficiency	143	89	(54)	-37.8%
C&I Training and Education	16	24	8	50.6%
Benchmarking Services and Certification Assistance	0	0	N/A	N/A
Recommissioning Study and Rebates	157	122	(35)	-22.5%
Multi-Family Building Efficiency	641	622	(18)	-2.8%
Subtotal:	11,745	12,145	400	3.4%

Program	Goal Demand Savings (Dth)	Actual Demand Savings (Dth)	Difference	Percent Difference
Other Programs				
Analysis, Evaluation, & Program Development	0	0	N/A	N/A
Energy Efficiency Marketing & Awareness	0	0	N/A	N/A
Planning & Regulatory Affairs	0	0	N/A	N/A
EZ Pay On-Bill Loan	0	0	N/A	N/A
Minnesota Efficient Technology Accelerator	0	0	N/A	N/A
Subtotal:	0	0	N/A	N/A
EFS Programs				
Home Efficiency Rebates	78	435	356	454.7%
Home Energy Squad	0	0	0	N/A
High-Efficiency Home	6	0	(6)	-100.0%
New Home Construction Rebates	0	0	0	N/A
Low-Income Weatherization	0	0	0	N/A
Low-Income Rental Efficiency	0	0	0	N/A
Homeowner Efficiency Redo Opportunity	1	0	(1)	-100.0%
Non-Profit Affordable Housing Rebates	0	1	1	N/A
Energy Design Assistance	0	0	0	N/A
Subtotal:	85	435	350	409.9%
ECO Total	18,742	18,906	164	0.9%

2024 Participation Summary

Program	Participation Goal	Actual Participation	Low-Income Participation Estimate	Actual Low-Income Participation
Residential Market Segment Programs				
Home Efficiency Rebates	31,500	26,405	441	357
DIY Home Efficiency	15,300	299	765	29
Home Insulation Rebates	2,500	2,647	15	13
Home Energy Reports	241,200	359,187	60,782	153,146
Home Energy Squad	7,500	4,535	338	265
High-Efficiency Home	3,675	4,291	7	8
New Home Construction Rebates	4,550	2,932	14	11
Energy Efficiency Kits	17,500	16,872	125	0
Residential Code Compliance Support	1	0	0	0
Subtotal:	323,726	417,168	62,487	153,829
Low-Income Market Segment Programs				
Low-Income Weatherization	2,276	1,372	2,276	1,372
Low-Income Rental Efficiency	325	452	325	452
Homeowner Efficiency Redo Opportunity	837	0	837	0
Low-Income Free Heating System Tune-Up	1,200	1,376	1,200	1,376
Non-Profit Affordable Housing Rebates	465	232	465	232
Low-Income Multi-Family Building Efficiency	123	166	123	166
Low-Income Support and Awareness	800	18	800	18
Subtotal:	6,026	3,616	6,026	3,616
C&I Market Segment Programs				
Commercial Foodservice Equipment Rebates	552	400	0	0
C&I Heating and Water Heating Rebates	5,922	4,469	0	0
C&I Custom Rebates	43	28	0	0
C&I Audit Services	246	274	0	0
Energy Design Assistance	68	49	10	15
Commercial Code Compliance Support	1	0	0	0
Industrial Process & Commercial Efficiency	15	34	0	0
C&I Training and Education	945	1,186	0	0
Benchmarking Services and Certification Assistance	1,320	1,908	0	0
Recommissioning Study and Rebates	26	20	0	0
Multi-Family Building Efficiency	571	847	0	0
Subtotal:	9,709	9,215	10	15

Program	Participation Goal	Actual Participation	Low-Income Participation Estimate	Actual Low-Income Participation
Other Programs				
Analysis, Evaluation, & Program Development	0	0	0	0
Energy Efficiency Marketing & Awareness	0	0	0	0
Planning & Regulatory Affairs	0	0	0	0
EZ Pay On-Bill Loan	200	210	3	0
Minnesota Efficient Technology Accelerator	0	0	0	0
Subtotal:	200	210	3	0
EFS Programs				
Home Efficiency Rebates	300	1,661	4	12
Home Energy Squad	375	123	17	4
High-Efficiency Home	10	0	0	0
New Home Construction Rebates	0	0	0	0
Low-Income Weatherization	0	0	0	0
Low-Income Rental Efficiency	0	0	0	0
Homeowner Efficiency Redo Opportunity	4	0	4	0
Non-Profit Affordable Housing Rebates	0	2	0	2
Energy Design Assistance	0	0	0	0
Subtotal:	689	1,786	25	18
ECO Total	340,350	431,995	68,551	157,478

The methods used to determine low-income customer participation rates for applicable projects are described in the individual Market Segment summaries below.

2024 Low-Income Spending Summary

Program	Total Spending	Estimated Low-Income Spending	Low-Income Spending	Percent Difference
Residential Market Segment Programs				
Home Efficiency Rebates	\$15,754,074	\$238,492	\$245,345	N/A
DIY Home Efficiency	\$291,715	\$46,464	\$28,293	N/A
Home Insulation Rebates	\$3,514,259	\$16,696	\$17,706	N/A
Home Energy Reports	\$1,849,165	\$416,364	\$767,222	84.3%
Home Energy Squad	\$2,786,134	\$133,432	\$162,806	N/A
High-Efficiency Home	\$9,723,868	\$14,064	\$15,009	N/A
New Home Construction Rebates	\$371,731	\$1,952	\$1,078	N/A
Energy Efficiency Kits	\$463,018	\$3,045	\$0	N/A
Residential Code Compliance Support	\$60,395	\$0	\$0	N/A
Subtotal:	\$34,814,360	\$870,508	\$1,237,460	N/A
Low-Income Market Segment Programs				
Low-Income Weatherization	\$7,022,490	\$3,962,192	\$7,022,490	77.2%
Low-Income Rental Efficiency	\$903,077	\$1,089,758	\$903,077	-17.1%
Homeowner Efficiency Redo Opportunity	\$457,593	\$1,413,092	\$457,593	-67.6%
Low-Income Free Heating System Tune-Up	\$206,214	\$163,563	\$206,214	26.1%
Non-Profit Affordable Housing Rebates	\$609,436	\$703,373	\$609,436	-13.4%
Low-Income Multi-Family Building Efficiency	\$835,546	\$650,234	\$835,546	28.5%
Low-Income Support and Awareness	\$249,228	\$323,125	\$249,228	-22.9%
Subtotal:	\$10,283,585	\$8,305,336	\$10,283,585	23.8%
C&I Market Segment Programs				
Commercial Foodservice Equipment Rebates	\$733,056	\$0	\$0	N/A
C&I Heating and Water Heating Rebates	\$3,768,011	\$0	\$0	N/A
C&I Custom Rebates	\$2,418,808	\$0	\$0	N/A
C&I Audit Services	\$630,888	\$0	\$0	N/A
Energy Design Assistance	\$1,115,849	\$261,495	\$348,167	33.1%
Commercial Code Compliance Support	\$223,394	\$0	\$0	N/A
Industrial Process & Commercial Efficiency	\$343,741	\$0	\$0	N/A
C&I Training and Education	\$123,153	\$0	\$0	N/A
Benchmarking Services and Certification Assistance	\$180,357	\$0	\$0	N/A
Recommissioning Study and Rebates	\$165,135	\$0	\$0	N/A
Multi-Family Building Efficiency	\$1,338,523	\$0	\$0	N/A
Subtotal:	\$11,040,915	\$261,495	\$348,167	33.1%

Program	Total Spending	Estimated Low-Income Spending	Low-Income Spending	Percent Difference
Other Programs				
Analysis, Evaluation, & Program Development	\$1,209,901	\$0	\$0	N/A
Energy Efficiency Marketing & Awareness	\$953,633	\$0	\$0	N/A
Planning & Regulatory Affairs	\$251,514	\$0	\$0	N/A
EZ Pay On-Bill Loan	\$274,352	\$8,810	\$0	N/A
Minnesota Efficient Technology Accelerator	\$1,121,321	\$0	\$0	N/A
Subtotal:	\$3,810,721	\$8,810	\$0	N/A
EFS Programs				
Home Efficiency Rebates	\$2,700,497	\$6,670	\$18,502	177.4%
Home Energy Squad	\$25,561	\$2,725	\$831	-69.5%
High-Efficiency Home	\$0	\$103	\$0	-100.0%
New Home Construction Rebates	\$0	\$0	\$0	N/A
Low-Income Weatherization	\$0	\$0	\$0	N/A
Low-Income Rental Efficiency	\$0	\$0	\$0	N/A
Homeowner Efficiency Redo Opportunity	\$0	\$20,063	\$0	-100.0%
Non-Profit Affordable Housing Rebates	\$29,889	\$0	\$29,889	N/A
Energy Design Assistance	\$0	\$0	\$0	N/A
Subtotal:	\$2,755,947	\$29,560	\$49,222	66.5%
ECO Total	\$62,705,528	\$9,475,709	\$11,918,433	25.8%

2024 Low-Income Energy Savings Summary

Program	Goal Energy Savings (Dth)	Actual Energy Savings (Dth)	Estimated Low-Income Energy Savings (Dth)	Actual Low-Income Energy Savings (Dth)
Residential Market Segment Programs				
Home Efficiency Rebates	296,816	259,268	4,155	3,691
DIY Home Efficiency	44,483	1,313	2,224	127
Home Insulation Rebates	33,732	55,828	202	291
Home Energy Reports	101,481	103,616	25,573	44,179
Home Energy Squad	34,960	17,711	1,573	1,195
High-Efficiency Home	105,370	127,006	211	171
New Home Construction Rebates	14,843	10,752	45	17
Energy Efficiency Kits	21,733	20,424	155	0
Residential Code Compliance Support	0	0	0	0
Subtotal:	653,418	595,919	34,139	49,671
Low-Income Market Segment Programs				
Low-Income Weatherization	16,285	17,852	16,285	17,852
Low-Income Rental Efficiency	2,846	2,399	2,846	2,399
Homeowner Efficiency Redo Opportunity	6,746	0	6,746	0
Low-Income Free Heating System Tune-Up	1,828	2,149	1,828	2,149
Non-Profit Affordable Housing Rebates	2,708	2,046	2,708	2,046
Low-Income Multi-Family Building Efficiency	7,389	12,205	7,389	12,205
Low-Income Support and Awareness	0	0	0	0
Subtotal:	37,803	36,652	37,803	36,652
C&I Market Segment Programs				
Commercial Foodservice Equipment Rebates	49,005	49,456	0	0
C&I Heating and Water Heating Rebates	730,413	660,724	0	0
C&I Custom Rebates	135,005	322,917	0	0
C&I Audit Services	8,538	1,621	0	0
Energy Design Assistance	155,772	93,991	22,898	21,492
Commercial Code Compliance Support	0	0	0	0
Industrial Process & Commercial Efficiency	14,326	8,905	0	0
C&I Training and Education	1,612	2,428	0	0
Benchmarking Services and Certification Assistance	0	0	0	0
Recommissioning Study and Rebates	15,730	12,198	0	0
Multi-Family Building Efficiency	64,055	62,234	0	0
Subtotal:	1,174,456	1,214,473	22,898	21,492

Program	Goal Energy Savings (Dth)	Actual Energy Savings (Dth)	Estimated Low-Income Energy Savings (Dth)	Actual Low- Income Energy Savings (Dth)
Other Programs				
Analysis, Evaluation, & Program Development	0	0	0	0
Energy Efficiency Marketing & Awareness	0	0	0	0
Planning & Regulatory Affairs	0	0	0	0
EZ Pay On-Bill Loan	0	0	0	0
Minnesota Efficient Technology Accelerator	0	0	0	0
Subtotal:	0	0	0	0
EFS Programs				
Home Efficiency Rebates	7,837	43,473	110	305
Home Energy Squad	0	0	0	0
High-Efficiency Home	603	0	1	0
New Home Construction Rebates	0	0	0	0
Low-Income Weatherization	0	0	0	0
Low-Income Rental Efficiency	0	0	0	0
Homeowner Efficiency Redo Opportunity	101	0	101	0
Non-Profit Affordable Housing Rebates	0	74	0	74
Energy Design Assistance	0	0	0	0
Subtotal:	8,540	43,548	212	379
ECO Total	1,874,218	1,890,592	95,052	108,195

2024 Renter Participation Summary

Program	Participation Goal	Actual Participation	Renter Participation Estimate	Actual Renter Participation
Residential Market Segment Programs				
Home Efficiency Rebates	31,500	26,405	1,670	1,174
DIY Home Efficiency	15,300	299	1,316	18
Home Insulation Rebates	2,500	2,647	158	149
Home Energy Reports	241,200	359,187	11,095	21,511
Home Energy Squad	7,500	4,535	578	309
High-Efficiency Home	3,675	4,291	26	193
New Home Construction Rebates	4,550	2,932	155	278
Energy Efficiency Kits	17,500	16,872	1,129	0
Residential Code Compliance Support	1	0	0	0
Subtotal:	323,726	417,168	16,125	23,632
Low-Income Market Segment Programs				
Low-Income Weatherization	2,276	1,372	146	67
Low-Income Rental Efficiency	325	452	325	452
Homeowner Efficiency Redo Opportunity	837	0	54	N/A
Low-Income Free Heating System Tune-Up	1,200	1,376	80	2
Non-Profit Affordable Housing Rebates	465	232	9	12
Low-Income Multi-Family Building Efficiency	123	166	123	166
Low-Income Support and Awareness	800	18	51	4
Subtotal:	6,026	3,616	788	703
C&I Market Segment Programs				
Commercial Foodservice Equipment Rebates	552	400	0	0
C&I Heating and Water Heating Rebates	5,922	4,469	0	0
C&I Custom Rebates	43	28	0	0
C&I Audit Services	246	274	9	0
Energy Design Assistance	68	49	50	39
Commercial Code Compliance Support	1	0	0	0
Industrial Process & Commercial Efficiency	15	34	0	0
C&I Training and Education	945	1,186	0	0
Benchmarking Services and Certification Assistance	1,320	1,908	0	0
Recommissioning Study and Rebates	26	20	0	0
Multi-Family Building Efficiency	571	847	571	847
Subtotal:	9,709	9,215	630	886

Program	Participation Goal	Actual Participation	Renter Participation Estimate	Actual Renter Participation
Other Programs				
Analysis, Evaluation, & Program Development	0	0	0	0
Energy Efficiency Marketing & Awareness	0	0	0	0
Planning & Regulatory Affairs	0	0	0	0
EZ Pay On-Bill Loan	200	210	0	1
Minnesota Efficient Technology Accelerator	0	0	0	0
Subtotal:	200	210	0	1
EFS Programs				
Home Efficiency Rebates	300	1,661	16	62
Home Energy Squad	375	123	29	4
High-Efficiency Home	10	0	0	0
New Home Construction Rebates	0	0	0	0
Low-Income Weatherization	0	0	0	0
Low-Income Rental Efficiency	0	0	0	0
Homeowner Efficiency Redo Opportunity	4	0	0	0
Non-Profit Affordable Housing Rebates	0	2	0	0
Energy Design Assistance	0	0	0	0
Subtotal:	689	1,786	45	66
ECO Total	340,350	431,995	17,588	25,288

The methods used to determine renter participation rates for applicable projects are described in the individual Market Segment summaries below.

2024 Cost-Benefit Analyses

Project	Ratepayer Impact Test	Utility Cost Test	Societal Test	Participant Test	Minnesota Test
Residential Segment					
Home Efficiency Rebates	0.52	1.53	2.33	3.13	2.81
DIY Home Efficiency	0.19	0.27	0.46	N/A	0.46
Home Insulation Rebates	0.52	1.54	1.35	1.68	2.84
Home Energy Reports	0.44	1.05	1.69	N/A	1.69
Home Energy Squad	0.25	0.38	0.62	13.11	0.65
High-Efficiency Home	0.48	1.29	1.20	1.60	2.38
New Home Construction Rebates	0.58	2.23	2.14	2.77	4.01
Energy Efficiency Kits	0.55	1.91	3.24	N/A	3.24
Residential Code Compliance Support	0.00	0.00	0.00	N/A	0.00
Subtotal:	0.51	1.49	1.74	2.44	2.59
Low-Income Segment					
Low-Income Weatherization	0.20	0.27	0.50	N/A	0.50
Low-Income Rental Efficiency	0.18	0.24	0.30	0.90	0.43
Homeowner Efficiency Redo Opportunity	0.00	0.00	0.00	0.00	0.00
Low-Income Free Heating System Tune-Up	0.11	0.13	0.22	N/A	0.22
Non-Profit Affordable Housing Rebates	0.23	0.34	0.79	2.03	0.63
Low-Income Multi-Family Building Efficiency	0.46	1.04	1.28	2.01	1.83
Low-Income Support and Awareness	N/A	N/A	N/A	N/A	N/A
Subtotal:	0.22	0.32	0.54	3.59	0.57
C&I Segment					
Commercial Foodservice Equipment Rebates	0.71	3.83	3.23	3.25	6.74
C&I Heating and Water Heating Rebates	0.81	5.10	5.41	5.83	8.62
C&I Custom Rebates	1.12	7.23	6.55	4.70	13.48
C&I Audit Services	0.14	0.17	0.28	2.95	0.29
Energy Design Assistance	0.77	5.54	1.91	1.47	10.25
Commercial Code Compliance Support	0.00	0.00	0.00	N/A	0.00
Industrial Process & Commercial Efficiency	0.79	1.65	1.90	2.00	2.88
C&I Training and Education	0.35	0.60	0.94	6.86	1.00
Benchmarking Services and Certification Assistance	N/A	N/A	N/A	N/A	N/A
Recommissioning Study and Rebates	0.72	2.66	2.23	2.24	4.49
Multi-Family Building Efficiency	0.63	2.19	1.96	2.30	3.75
Subtotal:	0.78	5.15	4.15	4.16	8.99

Project	Ratepayer Impact Test	Utility Cost Test	Societal Test	Participant Test	Minnesota Test
Other Programs					
Analysis, Evaluation, & Program Development	N/A	N/A	N/A	N/A	N/A
Energy Efficiency Marketing & Awareness	N/A	N/A	N/A	N/A	N/A
Planning & Regulatory Affairs	N/A	N/A	N/A	N/A	N/A
EZ Pay On-Bill Loan	N/A	N/A	N/A	N/A	N/A
Minnesota Efficient Technology Accelerator	N/A	N/A	N/A	N/A	N/A
Subtotal:	N/A	N/A	N/A	N/A	N/A
Total CIP	0.57	2.13	2.28	2.83	3.50
EFS Segment					
Home Efficiency Rebates	0.57	2.28	0.92	0.78	1.16
Home Energy Squad	N/A	N/A	N/A	N/A	N/A
High-Efficiency Home	0.00	0.00	0.00	0.00	0.00
New Home Construction Rebates	0.00	0.00	0.00	0.00	0.00
Low-Income Weatherization	0.00	0.00	0.00	0.00	0.00
Low-Income Rental Efficiency	0.00	0.00	0.00	0.00	0.00
Homeowner Efficiency Redo Opportunity	0.00	0.00	0.00	0.00	0.00
Non-Profit Affordable Housing Rebates	0.22	0.32	0.82	1.90	0.49
Energy Design Assistance	0.00	0.00	0.00	0.00	0.00
Subtotal:	0.57	2.24	0.92	0.78	1.15
Total	0.57	2.13	2.28	2.83	3.50

2024 Cost per Dth Saved Comparison

Program	Approved Cost per Dth Saved	Actual Cost per Dth Saved	Percent Difference
Residential Market Segment Programs			
Home Efficiency Rebates	\$57.39	\$60.76	5.9%
DIY Home Efficiency	\$20.89	\$222.15	963.4%
Home Insulation Rebates	\$82.49	\$62.95	-23.7%
Home Energy Reports	\$16.28	\$17.85	9.6%
Home Energy Squad	\$84.81	\$157.31	85.5%
High-Efficiency Home	\$66.73	\$76.56	14.7%
New Home Construction Rebates	\$43.83	\$34.57	-21.1%
Energy Efficiency Kits	\$19.62	\$22.67	15.6%
Residential Code Compliance Support	\$0.00	\$0.00	0.0%
Subtotal:	\$51.46	\$58.42	13.5%
Low-Income Market Segment Programs			
Low-Income Weatherization	\$243.30	\$393.37	61.7%
Low-Income Rental Efficiency	\$382.87	\$376.40	-1.7%
Homeowner Efficiency Redo Opportunity	\$209.46	\$0.00	0.0%
Low-Income Free Heating System Tune-Up	\$89.46	\$95.94	7.2%
Non-Profit Affordable Housing Rebates	\$259.74	\$297.83	14.7%
Low-Income Multi-Family Building Efficiency	\$88.00	\$68.46	-22.2%
Low-Income Support and Awareness	N/A	N/A	N/A
Subtotal:	\$219.70	\$280.57	27.7%
C&I Market Segment Programs			
Commercial Foodservice Equipment Rebates	\$16.15	\$14.82	-8.2%
C&I Heating and Water Heating Rebates	\$4.54	\$5.70	25.7%
C&I Custom Rebates	\$14.19	\$7.49	-47.2%
C&I Audit Services	\$82.22	\$389.28	373.5%
Energy Design Assistance	\$11.42	\$11.87	4.0%
Commercial Code Compliance Support	\$0.00	\$0.00	0.0%
Industrial Process & Commercial Efficiency	\$22.65	\$38.60	70.4%
C&I Training and Education	\$88.89	\$50.72	-42.9%
Benchmarking Services and Certification Assistance	N/A	N/A	N/A
Recommissioning Study and Rebates	\$15.07	\$13.54	-10.2%
Multi-Family Building Efficiency	\$22.94	\$21.51	-6.2%
Subtotal:	\$9.27	\$9.09	-1.9%

Program	Approved Cost per Dth Saved	Actual Cost per Dth Saved	Percent Difference
Other Programs			
Analysis, Evaluation, & Program Development	N/A	N/A	N/A
Energy Efficiency Marketing & Awareness	N/A	N/A	N/A
Planning & Regulatory Affairs	N/A	N/A	N/A
EZ Pay On-Bill Loan	N/A	N/A	N/A
Minnesota Efficient Technology Accelerator	N/A	N/A	N/A
Subtotal:	N/A	N/A	N/A
EFS Programs			
Home Efficiency Rebates	\$60.79	\$62.12	2.18%
Home Energy Squad	N/A	N/A	N/A
High-Efficiency Home	\$85.14	\$0.00	N/A
New Home Construction Rebates	\$0.00	\$0.00	0.00%
Low-Income Weatherization	\$0.00	\$0.00	0.00%
Low-Income Rental Efficiency	\$0.00	\$0.00	0.00%
Homeowner Efficiency Redo Opportunity	\$198.93	\$0.00	N/A
Non-Profit Affordable Housing Rebates	\$0.00	\$401.98	N/A
Energy Design Assistance	\$0.00	\$0.00	0.0%
Subtotal:	\$71.23	\$63.29	-11.16%
ECO Total	\$30.84	\$33.17	7.5%

2024 LIHEAP and GAP Participation Summary

Program	Participation Goal	Actual Participation	Low-Income Participants	GAP Participants
Residential Market Segment Programs				
Home Efficiency Rebates	31,500	26,405	357	124
DIY Home Efficiency	15,300	299	29	13
Home Insulation Rebates	2,500	2,647	13	2
Home Energy Reports	241,200	359,187	153,146	5,492
Home Energy Squad	7,500	4,535	265	122
High-Efficiency Home	3,675	4,291	8	1
New Home Construction Rebates	4,550	2,932	11	3
Energy Efficiency Kits	17,500	16,872	0	0
Residential Code Compliance Support	1	0	0	0
Subtotal:	323,726	417,168	153,829	5,757
Low-Income Market Segment Programs				
Low-Income Weatherization	2,276	1,372	1,372	441
Low-Income Rental Efficiency	325	452	452	25
Homeowner Efficiency Redo Opportunity	837	0	0	0
Low-Income Free Heating System Tune-Up	1,200	1,376	1,376	671
Non-Profit Affordable Housing Rebates	465	232	0	0
Low-Income Multi-Family Building Efficiency	123	166	232	0
Low-Income Support and Awareness	800	18	18	9
Subtotal:	6,026	3,616	3,616	1,146
C&I Market Segment Programs	0	0		
Commercial Foodservice Equipment Rebates	552	400	0	0
C&I Heating and Water Heating Rebates	5,922	4,469	0	0
C&I Custom Rebates	43	28	0	0
C&I Audit Services	246	274	0	0
Energy Design Assistance	68	49	15	0
Commercial Code Compliance Support	1	0	0	0
Industrial Process & Commercial Efficiency	15	34	0	0
C&I Training and Education	945	1,186	0	0
Benchmarking Services and Certification Assistance	1,320	1,908	0	0
Recommissioning Study and Rebates	26	20	0	0
Multi-Family Building Efficiency	571	847	0	0
Subtotal:	9,709	9,215	15	0

Program	Participation Goal	Actual Participation	Low-Income Participants	GAP Participants
Other Programs				
Analysis, Evaluation, & Program Development	0	0	0	0
Energy Efficiency Marketing & Awareness	0	0	0	0
Planning & Regulatory Affairs	0	0	0	0
EZ Pay On-Bill Loan	200	210	0	0
Minnesota Efficient Technology Accelerator	0	0	0	0
Subtotal:	200	210	0	0
EFS Programs				
Home Efficiency Rebates	300	1,661	12	4
Home Energy Squad	375	123	4	1
High-Efficiency Home	10	0	0	0
New Home Construction Rebates	0	0	0	0
Low-Income Weatherization	0	0	0	0
Low-Income Rental Efficiency	0	0	0	0
Homeowner Efficiency Redo Opportunity	4	0	0	0
Non-Profit Affordable Housing Rebates	0	2	2	0
Energy Design Assistance	0	0	0	0
Subtotal:	689	1,786	18	5
ECO Total	340,350	431,995	157,478	6,908

On November 5, 2020, the Minnesota Public Utilities Commission ordered CenterPoint Energy to provide the following in the CIP/ECO annual status reports: “CenterPoint shall provide the number of LIHEAP [Low-Income Home Energy Assistance Program] and GAP [Gas Affordability Program] customers that participate in CenterPoint’s CIP programs.”²⁶ This information is reported in the table above. The figures above regarding LIHEAP and GAP participation were established through a cross-check between the Company’s ECO participation,²⁷ LIHEAP, and GAP participation records.

For the 2024 ECO program year, a LIHEAP participant is defined as a customer who has received LIHEAP funding for the 2023-2024 or 2024-2025 winter seasons. LIHEAP in Minnesota is funded per winter season, so to cover an ECO year, both winter seasons are needed.

²⁶ *In the Matter of the Application of CenterPoint Energy Resources Corp. for Approval of its 2019 Gas Affordability Program Report* Docket No. G-008/M-20-399, Ordering Point 7 (Nov. 5, 2020).

²⁷ ECO cross-checks used the same definition of participant as is used in each individual program. The Company does not have information on customers to cross-check for LIHEAP/GAP in the Energy Efficiency Kits, Non-Profit Affordable Housing Rebates, or Low-Income Multi-Family Housing Rebates programs.

GAP is offered by CenterPoint Energy and is available to residential customers who receive LIHEAP assistance, agree to be placed on a levelized payment plan, and qualify for an affordability and/or arrearage forgiveness levelized credit under the terms of the Program.²⁸ For the 2024 ECO program year, a GAP participant is defined as a GAP participant in the program at the end of the federal fiscal year.²⁹

²⁸ *In the Matter of the Application by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G-008/GR-23-173, Compliance Filing, pp. 25-25.b (Jan. 2, 2024).

²⁹ In the 2024 ECO program year, the federal fiscal year ended on September 30, 2024.

Residential Market Segment Programs

CenterPoint Energy's Residential Market Segment achieved 129% of the Segment's participation goal and 91% of the energy savings goal while spending was 104% of budget.

CenterPoint Energy submits 2024 year-end information on the following residential programs:

- Home Efficiency Rebates;
- DIY Home Efficiency;
- Home Insulation Rebates;
- Home Energy Reports;
- Home Energy Squad;
- High-Efficiency Home;
- New Home Construction Rebates;
- Energy Efficiency Kits; and
- Residential Code Compliance Support.

Residential Market Segment	Program Spending	Program Participation	Energy Savings (Dth)	\$/Dth	BenCost Results (Minnesota Test)	BenCost Results (Societal Test)
Home Efficiency Rebates	\$15,754,074	26,405	259,268	\$60.76	2.81	2.33
DIY Home Efficiency	\$291,715	299	1,313	\$222.15	0.46	0.46
Home Insulation Rebates	\$3,514,259	2,647	55,828	\$62.95	2.84	1.35
Home Energy Reports	\$1,849,165	359,187	103,616	\$17.85	1.69	1.69
Home Energy Squad	\$2,786,134	4,535	17,711	\$157.31	0.65	0.62
High-Efficiency Home	\$9,723,868	4,291	127,006	\$76.56	2.38	1.20
New Home Construction Rebates	\$371,731	2,932	10,752	\$34.57	4.01	2.14
Energy Efficiency Kits	\$463,018	16,872	20,424	\$22.67	3.24	3.24
Residential Code Compliance Support	\$60,395	0	0	0	0.00	0.00
Residential Total	\$34,814,360	417,168	595,919	\$58.42	2.59	1.74

Detailed descriptions of Residential Market Segment programs can be found in *CenterPoint Energy's 2024-2026 Energy Conservation and Optimization Triennial Plan*.³⁰

Method Used to Determine Achievement of Low-Income and Renter Goals for the Residential Market Segment

The figures regarding low-income participation were established through a cross-check between CenterPoint Energy's ECO participation and Low-Income Home Energy Assistance Program

³⁰ *In the Matter of CenterPoint Energy's 2024-2026 Natural Gas Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-23-95, Compliance Filing (Jan. 26, 2024).

(“LIHEAP”) recipient records. Renter participation was established through a cross-check of rental data in CenterPoint Energy’s customer information system.

For the hybrid Home Energy Reports program, customers qualified for the program’s specialized services for low-income customers through enrollment in LIHEAP, having a household income below 80 percent of area median income (using the income limit for a two-person household), or having a household income below 50 percent of state median income (using the income limit for a two-person household) to align with Minnesota’s LIHEAP income guidelines.³¹

Home Efficiency Rebates

The program achieved 84% of its participation goal and 87% of its energy savings goal while program spending was 92% of budget.

The following table shows the quantities of each type of measure rebated through the program:

Home Efficiency Rebates: Quantity of Measures Rebated

Measure Type	Quantity Rebated
Heating System Equipment	15,559
Water Heaters	2,481
Thermostats	7,248
ENERGY STAR® Laundry Equipment	253
Hearth with Electronic Ignition	864
Total	26,405

DIY Home Efficiency

The program achieved 2% of its participation goal and 3% of its energy savings goal while program spending was 31% of budget.

The DIY program’s 2024 re-launch was delayed until 2025 due to a transition between the previous and the current program implementer. In the interim, CenterPoint Energy took steps to meet customer demand for the DIY program, including 1) during the first quarter of 2024, mailing energy efficiency kits to customers who inquired about the status of the DIY program and 2) during the fourth quarter of 2024, mailing energy efficiency kits to customers who requested them after the Company conducted targeted outreach to seniors through a partnership with a nonprofit organization. CenterPoint Energy is preparing for broader outreach

³¹ The household income limit is based on a conservative assumption of two persons per household, established using U.S. Census data, which is below the current statewide average household size of 2.44, and is likely below the average for the targeted population. United States Census Bureau. QuickFacts Minnesota, available at <https://www.census.gov/quickfacts/MN> (last visited Apr. 2, 2025).

in 2025 to promote the DIY program, including additional in-person events to raise awareness of the program.

Home Insulation Rebates

The program achieved 106% of its participation goal and 166% of its energy savings goal while program spending was 126% of budget.³²

The following table shows the quantities of each type of measure rebated through the program:

Home Insulation Rebates: Quantity of Measures Rebated

Measure Type	Quantity Rebated ³³
Wall Insulation	456
Attic Sealing (alone)	15
Attic Insulation + Air Sealing	1,998
Sill Plate/Rim Joist	178
ENERGY STAR® v. 7 windows	0
Low-e storm windows	0
Total	2,647

Home Energy Reports

The program achieved 149% of its participation goal and 102% of its energy savings goal while program spending was 112% of budget.

In alignment with hybrid low-income/market rate program requirements, the following table shows low-income participation, energy savings, and spending through the program relative to the *2024-2026 ECO Triennial Plan*.

³² In *CenterPoint Energy's 2021-2023 CIP Triennial Plan*, the Company stated that it would calculate energy savings for conservation measures consistent with the State of Minnesota Technical Reference Manual for Energy Conservation Improvement Programs ("TRM") version 3.1. See CenterPoint Energy's Approved 2021-2023 CIP Triennial Plan, Docket No. G-008/CIP-20-478, p. A-5. However, in 2022 the Company deviated slightly from the TRM method when determining the 2021 energy savings for attic sealing measures. For attic sealing, the TRM includes a factor for converting leakage at 50 pascals to leakage at natural conditions. TRM, Version 3.1, Docket No. E,G-999/CIP-15-896, pp. 427-429, (Jan. 14, 2016). The information for determining this factor was not submitted for some rebates in 2022. As discussed with the Department in 2017, the Company assumed an average conversion factor for these rebates based on 2022 rebates for which the Company had complete information on the rebated homes.

³³ The rollout of the windows incentives has been delayed until 2025 due to the windows being new measures with implementation hurdles. CenterPoint Energy is now working towards a 2025 launch, with a rebate retroactive date of Jan. 1, 2025.

Low-income participation and spending were much higher than goal due to expanded low-income guidelines in 2024 to 80 percent of area median income.³⁴

Home Energy Reports: Low-Income Metrics

Low-Income Metric	Goal	Actual
Participation	60,782	153,146
Energy Savings (Dth)	76,720	44,179
Total Spending (\$)	\$416,364	\$767,222

Home Energy Squad

The program achieved 60% of its participation goal and 51% of its energy savings goal while program spending was 94% of budget.

There were 4,535 unique customer accounts served through squad visits, 1062 of which were provided to self-identified low-income customers for no fee. In 2024, some municipalities chose to encourage participation in the Home Energy Squad program by paying a portion of program fees for their residents. In total, local governments and neighborhood associations reduced customers' fees by providing \$231,245 in funding.

Following the addition of a second HES implementer, CenterPoint Energy anticipates higher participation in the HES program in 2025. Selecting and onboarding a second implementer was a major focus of the HES program in 2024. The second implementer is growing the HES program's capacity to meet customer demand. Additionally, the two implementers are serving different parts of the Company's service territory, with the new implementer delivering the HES program in outstate Minnesota to encourage additional participation across all the communities the Company serves.

High-Efficiency Home

The program achieved 117% of its participation goal and 121% of its energy savings goal while program spending was 138% of budget.

HEH benefits from effective marketing and strong relationships cultivated among participating home builders and home raters. As compared to 2023, the HEH program in 2024 saw a higher percentage of homes in the higher gas savings tiers (25-29 percent and 30-34 percent above baseline) and a lower proportion of homes in the lower gas savings tiers (10-14 percent and 15-19 percent above baseline).

There were 1,285 bonus rebates for tankless water heaters.

³⁴ See page 39.

The following table shows how many participating homes achieved the energy savings required for each rebate tier.

High-Efficiency Home: Quantity of Participating Homes by Rebate Tier

Percent Gas Savings Above Code	Quantity of Homes Achieving
10-14%	234
15-19%	745
20-24%	1,357
25-29%	1,343
30-34%	555
35-39%	49
40% gas savings and above	8
Total	4,291

In 2024, no Passive House certification incentives were paid through the High-Efficiency Home program.

New Home Construction Rebates

The program achieved 64% of its participation goal and 72% of its energy savings goal, while program spending was 57% of budget.

The following table shows the quantities of each type of measure rebated through the program:

New Home Construction Rebates: Quantity of Measures Rebated

Measure Type	Quantity Rebated
Heating System Equipment	310
Water Heaters	54
Thermostats	387
ENERGY STAR® Laundry Equipment	23
Hearth with Electronic Ignition	2,158
Total	2,932

Energy Efficiency Kits

The program achieved 96% of its participation goal and 94% of its energy savings goal, while program spending was 109% of budget.

The following table shows the quantities of each measure distributed through the program, and by type of energy efficiency kit (School Kit, Community Kit, or Renter Kit):

Energy Efficiency Kits: Quantity of Measures

Measure Type	Quantity
School Kits	15,000
Community/Non-Profit Kits	1,203
Renter Kits	669
Total	16,872

Residential Code Compliance Support

The program did not have participation and energy savings goals in 2024, while program spending was 40% of budget. Due to the delay between code support and the resultant energy savings, the Company does not expect energy savings to be realized until 2026 at the earliest.

In collaboration with four other Minnesota electric and gas utilities, CenterPoint Energy contributed resources to the Minnesota Energy Code Support Program's residential codes and standards compliance initiative. This proactive effort supports communities across Minnesota in improving residential building energy code compliance. By providing resources and guidance, the utilities help communities throughout Minnesota understand and adhere to building codes in new construction projects, ultimately aiding them in achieving their energy performance and economic development goals.

The Minnesota Energy Code Support Program focused on commercial code services in 2024 due to the timeline of the code adoption cycle. Due to this split between residential code support and commercial code support, the commercial code compliance support spending was higher than budget and the residential code compliance support spending was lower than budget.

Low-Income Market Segment Programs

CenterPoint Energy's Low-Income Market Segment achieved 60% of the Segment's participation goal and 97% of the energy savings goal, while spending was 124% of budget.

CenterPoint Energy's spending on the Low-Income Market Segment programs represents 1.42% percent of the Company's three-year average GOR from residential customers.³⁵ As summarized in Table 2 of the Compliance Overview section of this Status Report, when low-income ECO spending for Home Energy Reports, Energy Design Assistance, and Non-Profit Affordable Housing Efficient Fuel-Switching ("EFS") (see EFS program section) are included, the Company spent 1.57% percent of its three-year average GOR from residential customers to directly serve low-income customers.

CenterPoint Energy submits 2024 year-end information on the following dedicated low-income programs:

- Low-Income Weatherization;
- Low-Income Rental Efficiency;
- Homeowner Efficiency Redo Opportunity;
- Low-Income Free Heating System Tune-Up;
- Non-Profit Affordable Housing Rebates;
- Low-Income Multi-Family Building Efficiency; and
- Low-Income Support and Awareness.

³⁵ Consistent with how ECO energy savings goals are calculated for Triennial Plan filings, the Company calculated its three-year average GOR from residential customers using the three most recent years prior to filing *CenterPoint Energy's 2024-2026 Energy Conservation and Optimization Plan*. See CenterPoint Energy's Approved 2024-2026 Conservation Improvement Program Triennial Plan, Docket No. G-008/CIP-23-95, p. 8 (Jan. 26, 2024). The Company calculated applicable minimum low-income spending amounts using the methodology approved by the Deputy Commissioner in 2015. See *In the Matter of CenterPoint Energy's Conservation Improvement Program 2013 Status Report*, Docket No. G-008/CIP-12-564.02, Deputy Commissioner Decision, Ordering Point 3 (Jan. 9, 2015).

Low-Income Market Segment	Program Spending	Program Participation	Energy Savings (Dth)	\$/Dth	BenCost Results (Minnesota Test)	BenCost Results (Societal Test)
Low-Income Weatherization	\$7,022,490	1,372	17,852	\$393.37	0.50	0.50
Low-Income Rental Efficiency	\$903,077	452	2,399	\$376.40	0.43	0.30
Homeowner Efficiency Re-do Opportunity	\$457,593	0	0	\$0.00	0.00	0.00
Low-Income Free Heating System Tune-Up	\$206,214	1,376	2,149	\$95.94	0.22	0.22
Non-Profit Affordable Housing Rebates	\$609,436	232	2,046	\$297.83	0.63	0.79
Low-Income Multi-Family Building Efficiency	\$835,546	166	12,205	\$68.46	1.83	1.28
Low-Income Support and Awareness	\$249,228	18	0	\$0.00	N/A	N/A
Low-Income Total	\$10,283,585	3,616	36,652	\$280.57	0.57	0.54

Detailed descriptions of Low-income Market Segment programs can be found in *CenterPoint Energy's Approved 2024-2026 Energy Conservation and Optimization Plan*.³⁶

Method Used to Determine Achievement of Low-Income and Renter Goals for the Low-Income Market Segment

Low-income status of residential customer participants in the Low-Income Market Segment was verified by third party agencies such as Community Action service providers, and non-profit affordable housing agencies. Low-income multi-family housing owners provided documentation to CenterPoint Energy showing pre-qualification for the Department of Energy Weatherization Assistance Program ("WAP"), certification for Minnesota Low-Income Rental Classification ("LIRC"), or other documentation including (but not limited to) participation in the project-based Section 8 voucher program. Renter participation was established either through a cross-check of rental data in CenterPoint Energy's customer information system or, when available, through third-party agency verification systems.

Additionally, certain customers qualified for low-income programs using geographic eligibility methods. For example, rental property owners in select high poverty areas (e.g., Minneapolis Green Zones, Qualified Census Tracts, Census Tracts exhibiting a high degree of social vulnerability) who met the program criteria could automatically qualify for the LIRE or LI MFBE programs.

³⁶ *CenterPoint Energy's Approved 2024-2026 Energy Conservation and Optimization Plan*. Docket No. G-008/CIP-23-95, (Jan. 26, 2024).

Low-Income Weatherization

The program achieved 60% of its participation goal and 110% of its energy savings goal while program spending was 177% of budget. 0 LIW customers qualified for the LIW program using geographic eligibility methods.³⁷

In 2024, the LIW program surpassed its energy savings goal and achieved its highest energy savings since 2018. This success was driven by targeted marketing campaigns to customers enrolled in LIHEAP, as authorized by the Department. Additionally, the LISA program provided support for LIW awareness building through mass media and low-income influencer audience outreach.³⁸

The following table shows the quantity and average cost of measures installed through the program:

Low-Income Weatherization: Quantity and Average Cost of Measures

Measure Type ³⁹	Quantity	Average Cost of Measure
Weatherization	417	\$7,201
Furnaces	236	\$5,744
Boilers	24	\$9,676
Combi Units	1	\$10,635
Thermostats	85	N/A
Water Heaters	256	\$3,697
Furnace or Boiler Tune-Ups/Repairs	61	\$621
Pipe/Water Heater Insulation	209	N/A
Renter Kits	83	N/A
Pre-Weatherization	139	\$4,356
Total⁴⁰	1,372	\$4,513

The following table shows the quantity of pre-weatherization measures by measure type:

³⁷ LIW standalone projects for renters rarely happen. For this reason, it was expected that no customers would use geographic-based eligibility to qualify for LIW standalone projects.

³⁸ Low-income audience influencers, whether they are individuals or organizations, may share what they learn about ECO low-income programs with qualifying customers, leading to higher ECO participation.

³⁹ In the Low-Income Weatherization program, thermostats are typically installed in conjunction with other measures such as furnaces and boilers, and pipe/water heater insulation is reported in conjunction with weatherization. CenterPoint Energy does not track the cost of thermostats, pipe wrap, and water heater insulation separately, but their costs are included as part of the cost of the larger measures with which they are installed.

⁴⁰ Total participation excludes the pre-weatherization measures because they are associated with energy efficiency measures, whereas the total average cost of measures includes pre-weatherization.

Low-Income Weatherization: Pre-Weatherization Measures

Measure Type	Measure Count
Radon	3
Airborne Hazards	77
Electrical Repair and Upgrades	14
Accessibility Issues	16
Mold and Moisture Mitigation	18
Plumbing Problems	4
Structural Repair or Replacement (Non-Moisture)	6
Ventilation Repairs or Replacement	1
Safety and Repairs	0
Total	139

Low-Income Rental Efficiency

The program achieved 139% of its participation goal and 84% of its energy savings goal while program spending was 83% of budget. 38 LIRE buildings, or 23% of total LIRE buildings, qualified for LIRE using geographic eligibility methods.⁴¹

The LIRE program's 2024 re-launch was delayed due to a transition between the previous and the current program implementer. Despite the delay, the LIRE program nearly met its 2024 energy savings goal. This success was driven by targeted marketing campaigns, including a joint marketing campaign with the city of Minneapolis to promote both the LIRE program and the city's Green Cost Share program. Some Minneapolis rental property owners were eligible for funds from both programs. Additionally, the LISA program supported LIRE awareness building through mass media and low-income influencer audience outreach.

The following tables show certain key program statistics, the quantity and total cost of measures installed, the quantity of pre-weatherization measures by measure type, and the number of units in participating buildings in the program:

⁴¹ *In the Matter of CenterPoint Energy's 2021-2023 Conservation Improvement Program Modification Request Filed September 1, 2021*. Docket No. G-008/CIP-20-478, DOC Decision, (Nov. 1, 2021).

Low-Income Rental Efficiency: Key Program Statistics

Number of Properties	Total Dth Savings	Total Property Manager Contribution	Total Cost ⁴²	Property Manager Contribution %
162	2,399	\$360,228	\$817,465	44%

Low-Income Rental Efficiency: Quantity and Total Cost of Measures Installed

Type of Measure	Quantity	Total Cost
Weatherization	11	\$34,000
Furnaces	50	\$296,255
Boilers	11	\$106,312
Combi Units	12	\$126,050
Thermostats	58	\$5,920
Water Heaters	53	\$200,470
Furnace or Boiler Tune-Ups/Repairs	3	\$519
Renter Kits	254	N/A
Pre-Weatherization	22	\$47,914
Total⁴³	452	\$817,440

⁴² Includes only the cost of the measures installed. Does not include the cost of the audit.

⁴³ Total participation excludes the pre-weatherization measures because they are associated with energy efficiency measures, whereas the total average cost of measures includes pre-weatherization.

Low-Income Rental Efficiency: Pre-Weatherization Measures

Measure Type	Measure Count
Radon	0
Airborne Hazards	7
Electrical Repair and Upgrades	12
Accessibility Issues	2
Mold and Moisture Mitigation	0
Plumbing Problems	0
Structural Repair or Replacement (Non-Moisture)	1
Ventilation Repairs or Replacement	0
Safety and Repairs	0
Total	22

Low-Income Rental Efficiency: Number of Units in Participating Buildings

Building Type	Quantity Participating
Single-Family	102
Duplex	39
Three-Unit	6
Four-Unit	15
Total	162

Homeowner Efficiency Re-do Opportunity

The program achieved 0% of its participation goal and 0% of its energy savings goal while program spending was 32% of budget. 0 customers qualified for the program's higher incentives using geographic eligibility methods.

The HERO program launch was delayed due to the process of selecting and onboarding a program implementer and building program capacity and infrastructure (e.g., hiring auditors and installers, creating a website).⁴⁴ A program implementer is now in place and marketing campaigns are underway.

⁴⁴ The HERO program soft launched in December 2024 with a marketing campaign that targeted relatively high poverty areas in Anoka County. In early 2025, the Company followed up by sending emails to Anoka County residents who previously received the HERO direct mail. CenterPoint Energy is preparing for a wider HERO program launch in spring 2025.

Low-Income Free Heating System Tune-Up

The program achieved 115% of its participation goal and 118% of its energy savings goal while program spending was 126% of budget.

In 2024, the Low-Income Free Heating System Tune-Up program exceeded its energy savings goal and achieved its highest energy savings since 2019. This success was largely driven by the early start to the outbound calling campaign to schedule appointments, which was supported by the Department-authorized Company use of its full LIHEAP, including customers whose EAP funds were paid to electric and water utilities.

Non-Profit Affordable Housing Rebates

The program achieved 50% of its participation goal and 76% of its energy savings goal while program spending was 87% of budget.

81 buildings, or 85 residences, participated in the program.

The following table shows the quantities of each type of prescriptive measure installed through the program:

Non-Profit Affordable Housing Rebates: Quantity of Measures Installed

Type of Measure	Quantity
Heating System Equipment	22
Thermostats	17
Water Heaters	17
Heat/Energy Recovery Ventilators	39
Weatherization Measures	42
Low-flow Showerheads and Aerators	24
Laundry Equipment	19
Pre-Weatherization	0
Total	180

In 2024, 52 homes participated in the Non-Profit Affordable Housing Rebates (“NPAH”) program performance path, and no Passive House certification rebates were paid through the NPAH program. Additionally, there were 0 bonus rebates for tankless water heaters and no pre-weatherization measures in the NPAH program in 2024.

The following table shows how many participating homes achieved the energy savings required for each rebate tier in the performance path.

Non-Profit Affordable Housing Rebates: Performance Path

Percent Gas Savings Above Code	Quantity of Homes Achieving
10-14%	1
15-19%	2
20-24%	14
25-29%	16
30-34%	11
35-39%	6
40% or above	2
Total	52

Low-Income Multi-Family Building Efficiency

The program achieved 135% of its participation goal and 165% of its energy savings goal while program spending was 128% of budget.

The 166 participating buildings had a total of 3,772 units. 2024 was the second year of the Low-Income Multi-Family Building Efficiency program (“LI MFBE”).⁴⁵ LI MFBE is a dedicated low-income program that provides the same design and services as the MFBE program. Low-income eligible 5+ unit multi-family properties receive bonus rebates in addition to the standard MFBE rebates for market-rate properties.

The following table shows the quantities of each type of measure rebated through the program:

Low-Income Multi-Family Building Efficiency: Participation Detail

LI MFBE Participation ⁴⁶	Goal	Actual	Percent Achieved
Whole Building Participation	104	166	160%
Renter Kit Participation	19	0	0%
Totals	123	166	135%

⁴⁵ *In the Matter of CenterPoint Energy’s 2021-2023 CIP Modification Request*, Docket No. G-008/CIP-20-478, Deputy Commissioner Decision, pp. 32-35 (Nov. 7, 2022).

⁴⁶ *In the Matter of CenterPoint Energy’s 2024-2026 Natural Gas Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-23-95, p. 138 (Jan. 26, 2024)

On December 1, 2023, the Department issued its Decision on CenterPoint Energy's 2024-2026 *Plan* that included an order that the Company continue to report the following additional Multi-Family Building Efficiency program performance metrics for the 2024 ECO Status Report.⁴⁷

Low-Income Multi-Family Building Efficiency: Completed Program Steps⁴⁸

Building Type	Completed Program Step	Buildings	Units	Energy Savings	Rebates
Low-Income	Assessment	75	3,024	n/a	n/a
Low-Income	Direct Installation	83	3,772	2,436	n/a
Low-Income	Performance Incentives	41	n/a	7,846	\$496,374

Low-Income Support and Awareness⁴⁹

The program achieved 2% of its participation goal while program spending was 77% of budget.

Please note that the 2024 LISA participation count excludes LISA electronic newsletter recipients and LISA hot line callers. The 2025 LISA participation count will include these additional LISA participants following the Department's approval of CenterPoint Energy's February 7, 2025, program modification request, which expanded the LISA participant definition.⁵⁰

The following table lists the various LISA activities and number of participants where data was available. Descriptions of each LISA activity are below the table.

⁴⁷ *In the Matter of CenterPoint Energy's 2024-2026 Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-23-95, p. 276 (Dec. 1, 2023).

⁴⁸ Building and unit participation listed in this table may appear to differ from total program participation because the LI MFBE project counts a building as participating if it receives at least one of the following: assessment, direct installation, or performance incentives.

⁴⁹ LISA is an indirect impact program intended to raise awareness of low-income ECO programs.

⁵⁰ *In the Matter of CenterPoint Energy's 2024-2026 Energy Conservation and Optimization Triennial Plan, Program Modification Request*. Docket No. G-008/CIP-23-95, DOC Decision, (March 27, 2025).

Activity	Number of Unique Recipients, Callers, or Organizations
Customer Awareness Marketing	N/A
Community Marketing	803
LISA Hot Line	35
LISA Hot Line Direct Impact Program Participation	0
Building and Leveraging Community/Non-Profit Relationships	12

The following table lists the nonprofit organizations and social services agencies the LISA community engagement project manager developed relationships with:

Organization
Phillips West Neighborhood Organization
Minneapolis Senior Fair (Minneapolis Wards 8, 11, and 12 together organized a senior fair that the community engagement manager attended to promote CenterPoint Energy's low-income programs.)
Harrison Neighborhood Association
McKinley Community
Minnesota Assistance Council for Veterans
Waite House
Sheridan Neighborhood
Bottineau Neighborhood
Trellis
Legacy Adult Day
Career Force
VEAP (Volunteers Enlisted to Assist People)

The following table shows how customers reported learning about the low-income programs. Customers were allowed to check as many boxes as applied:⁵¹

⁵¹ Customer counts are based on responses to a survey question ("How did you hear about us?") on the LIW, LIRE, and HERO program applications. On the survey question, customers had the option to select more than one channel. For this reason, if the customer counts are summed, the total does not match the number of customers who responded to the survey question. The survey question was not added to the program applications until late 2024, and as a result the 2024 data consists of only the final month of 2024.

Channel	Customer Count
Email	24
Mail	319
Social Media	2
Search Engine	3
Recommended by a Friend	9
Recommended by an Organization	26
Event	0
Participation in Another CenterPoint Energy Program	64
Other ⁵²	11

Customer Awareness Marketing

Low-income programs were promoted using a variety of methods, including social media, digital advertisements, video advertisements, and search engine marketing. These efforts resulted in 25,541 clicks to CenterPoint Energy's low-income programs webpage where customers could learn more about programs and resources for low-income customers.

Community Marketing

The Energy Connections electronic newsletter is sent on a quarterly basis to community agencies serving low-income customers. The content includes marketing assets, information on low-income programs, and resources to help customers determine which CenterPoint Energy program(s) may be the best fit for them and how to apply. The newsletter also shares low-cost and no-cost energy savings tips.

LISA Hot Line

The LISA hotline connects customers with CenterPoint Energy staff who respond to inquiries regarding low-income programs. Staff work with each caller to help determine which programs and resources they may qualify for and help walk the customer through how to apply (when applicable).

LISA Hot Line Direct Impact Program Participation

This is the number of customers who called the LISA hotline and subsequently participated in a direct impact low-income program.

Building and Leveraging Community/Non-Profit Relationships

This is the number of unique organizations that the LISA community engagement manager met and shared low-income program information with.

⁵² Customers who selected "Other" did not provide the other channel(s) through which they learned about the direct impact programs, so CenterPoint Energy does not have this information.

Commercial and Industrial Market Segment Programs

CenterPoint Energy's C&I Market Segment achieved 95% of the segment's participation goal and 103% of its energy savings goal while spending 101% of budget.

CenterPoint Energy submits 2024 year-end information on the following C&I programs:

- Commercial Foodservice Equipment Rebates;
- C&I Heating and Water Heating Rebates;
- C&I Custom Rebates;
- C&I Audit Services;
- Energy Design Assistance;
- Commercial Code Compliance Support;
- Industrial Process and Commercial Efficiency;
- C&I Training and Education;
- Benchmarking Services and Certification Assistance;
- Recommissioning Study and Rebates; and
- Multi-Family Building Efficiency.

C&I Market Segment	Program Spending	Program Participation	Energy Savings (Dth)	\$/Dth	BenCost Results (Minnesota Test)	BenCost Results (Societal Test)
Commercial Foodservice Equipment Rebates	\$733,056	400	49,456	\$14.82	6.74	3.23
C&I Heating and Water Heating Rebates	\$3,768,011	4,469	660,724	\$5.70	8.62	5.41
C&I Custom Rebates	\$2,418,808	28	322,917	\$7.49	13.48	6.55
C&I Audit Services	\$630,888	274	1,621	\$389.28	0.29	0.28
Energy Design Assistance	\$1,115,849	49	93,991	\$11.87	10.25	1.91
Code Compliance Support	\$223,394	0	0	\$0.00	0.00	0.00
Industrial Process & Commercial Efficiency	\$343,741	34	8,905	\$38.60	2.88	1.90
C&I Training and Education	\$123,153	1,186	2,428	\$50.72	1.00	0.94
Benchmarking Services and Certification Assistance	\$180,357	1,908	0	N/A	N/A	N/A
Recommissioning Study and Rebates	\$165,135	20	12,198	\$13.54	4.49	2.23
Multi-Family Building Efficiency	\$1,338,523	847	62,234	\$21.51	3.75	1.96
C&I Total	\$11,040,915	9,215	1,214,473	\$9.09	8.99	4.15

Detailed descriptions of C&I Market Segment programs can be found in *CenterPoint Energy's Approved 2024-2026 Energy Conservation and Optimization Plan*.⁵³

Measurement and Verification Expenses

The Company provides the following information regarding expenses related to energy savings measurement and verification ("M&V") spending included in the C&I Market Segment spending total:⁵⁴

2024 M&V Expenses	
Labor	\$21,500
Equipment	\$0
Contracting Expenses	\$0
Total	\$21,500

Two customer projects requiring M&V were completed in 2024 as part of the C&I Custom Rebates program.

Method Used to Determine Achievement of Low-Income and Renter Goals in the C&I Market Segment

Low-income participation in the C&I Market Segment is defined as verified low-income multi-family housing participants. Low-income multi-family housing customers provided documentation to CenterPoint Energy showing pre-qualification for WAP, certification for LIRC, or other documentation including (but not limited to) participation in the project-based Section 8 voucher program. Renter participation was established through a cross-check of Standard Industrial Classification ("SIC") codes in CenterPoint Energy's customer information system. Participants with SIC codes representing multi-family housing are considered "renter participants" in the C&I market.

Commercial Foodservice Equipment Rebates

The program achieved 72% of its participation goal and 101% of its energy savings goal while program spending was 93% of budget.

The 184 participating customers installed 400 energy conservation measures through the program.

⁵³ *CenterPoint Energy's Approved 2024-2026 Energy Conservation and Optimization Plan*. Docket No. G-008/CIP-23-95, (Jan. 26, 2024).

⁵⁴ In *CenterPoint Energy's Request for Modification to its Commercial/Industrial Project for its 2008 CIP Program Year*, Docket No. G-008/CIP-06-789, Commissioner Ordering Point 2 (Aug. 25, 2008), the Company was ordered to "track all labor, equipment, and third-party contracting expenses associated with its Measurement and Verification activities and to report these expenses as separate line items in its annual CIP status reports."

C&I Heating and Water Heating Rebates

The program achieved 75% of its participation goal and 90% of its energy savings goal while program spending was 114% of budget.

The 945 participating customers installed 4,469 energy conservation measures through the program. The C&I Heating and Water Heating Rebates program gave 52 participants New Normal triple rebates for high-efficiency equipment. The rebated measures had rebates totaling \$220,415 to customers who participated in the New Normal Pilot Program.⁵⁵

C&I Custom Rebates

The program achieved 65% of its participation goal and 239% of its energy savings goal while program spending was 126% of budget. In 2024, CenterPoint Energy completed 24 custom projects and 4 engineering assistance projects.

CenterPoint Energy partnered again with Center for Energy and Environment's ("CEE") One Stop Efficiency Shop in 2024. The One Stop Efficiency Shop included 116 participants but is categorized as 1 engineering assistance project. Technicians/engineers installed thermostats inside the buildings they audited. The engineers calculated 3,701 Dth savings and created reports to record these energy savings as well as lists of suggested energy efficiency upgrades for the owners of the buildings. CEE gave the Company a copy of the report containing the suggested upgrades and the cost of the installation of the thermostats. With notification to the customer, the Company provided Engineering Assistance Rebates to CEE. The customers are expected to participate in other programs based on the audit reports' suggested upgrades.

In 2024, CenterPoint Energy rebated two large C&I custom projects. The energy savings from these two projects alone surpassed the annual program goal. The Company claimed savings for these projects through Department-approved post-M&V reports.

C&I Audit Services

The program achieved 111% of its participation goal and 19% of its energy savings goal while program spending was 90% of budget.

In 2024, the C&I Audit Services program achieved its participation goal but did not meet its energy savings goal. There was a significant decline in the number of direct install measures in 2024 compared to prior years. This decrease is attributable to two primary factors; audits mandated by municipalities in prior years and a recent decline in participant uptake of direct install measures.

⁵⁵ The New Normal is a pilot program that consists of an energy efficiency pathway for C&I customers (excluding multifamily) in Minneapolis that allows customers that achieved participation requirements before the end of 2024 to earn bonus rebates through 2025. See program modifications section for additional details.

CenterPoint Energy collaborated with Xcel Energy and Wright Hennepin to provide audits identifying both gas and electric savings opportunities for 110 customers.

The following table shows the quantities of each type of service through the program:

C&I Audit Services: Participation and Energy Savings

Type of Measure	Participation	Energy Savings
Natural Gas Energy Analysis	170	1,621
Scoping audit	0	0
Steam trap audit (per trap)	104	0
Total	274	1,621

Energy Design Assistance

The program achieved 72% of its participation goal and 60% of its energy savings goal while program spending was 63% of budget.

In 2024, there were 179 participants enrolled in the program; 49 participants completed energy efficiency projects in 2024. Fewer new construction projects were completed in 2024, resulting in the program not reaching goal.

Of the 49 projects that were completed in 2024, 15 qualified as low-income multi-family housing participants. These buildings had a total of 1,558 units of housing and were accordingly provided higher rebates.

In 2024, no Passive House or LEED certification incentives were paid through the Energy Design Assistance program.

In alignment with hybrid low-income/market rate program requirements, the following table shows low-income participation, energy savings, and rebates through the program relative to the *2024-2026 ECO Triennial Plan*.

Energy Design Assistance: Low-Income Participation, Energy Savings, and Spending

Low-Income Metrics	Goal	Actual
Participation	10	15
Energy Savings (Dth)	22,899	21,492
Total Spending (\$)	\$261,495	\$348,167
Incentives (\$)	\$106,704	\$171,936

Commercial Code Compliance Support

The program did not have participation and savings goals while program spending was 547% of budget. Due to the delay between code support and the resultant energy savings, the Company does not expect energy savings to be realized until 2025 at the earliest.

In collaboration with four other Minnesota electric and gas utilities, CenterPoint Energy contributed resources to the Minnesota Energy Code Support Program's commercial codes and standards compliance initiative. This proactive effort supports communities across Minnesota in improving commercial building energy code compliance. By providing resources and guidance, the utilities help communities throughout Minnesota understand and adhere to building codes in new construction projects, ultimately aiding them in achieving their energy performance and economic development goals.

The Minnesota Energy Code Support Program focused on commercial code services in 2024 due to the timeline of the code adoption cycle. Due to this split between residential code support and commercial code support, the commercial code compliance support spending was higher than budget and the residential code compliance support spending was lower than budget.

Industrial Process and Commercial Efficiency

The program achieved 227% of its participation goal and 62% of its energy savings goal while program spending was 106% of budget.

There were 34 participants enrolled in the program, which paid rebates for 3 projects in 2024. Each customer enrolled in the program received an analysis to identify potential energy savings and/or rebate opportunities.

Customers in the Industrial Process and Commercial Efficiency program may also have measures or projects through the Company's Natural Gas Innovation Act Innovation Plan. NGIA and ECO programs will coordinate this handoff. The Industrial Process and Commercial Efficiency program will cover initial contact cost and miscellaneous administration costs. If NGIA decarbonization projects are discussed during a customer's audit, an adder fee is included and charged to NGIA on top of the initial ECO audit cost. Projects that are rebate-eligible through the Industrial Process and Commercial Efficiency program will not receive NGIA incentives.

CenterPoint Energy is not expecting to need to make changes to the program budget and is also not expecting significant participation changes to this program, at least through the current triennial.

C&I Training and Education

The program achieved 126% of its participation goal and 151% of its energy savings goal while program spending was 86% of budget.

Seminar/Training Event	Number of Participants
Foodservice Equipment Training	890
Trade Ally Kick Off	40
Energy Efficiency and Technology Conference	130
Seasonal Energy Management Seminar	70
Spanish Speaking Boiler Certification Class	28
High-Efficiency Boiler Training Seminar	17
Building Operation Certification	11
Total	1,186

C&I Training and Education participation was higher in 2024 than in 2023. Technical Seminars and the Commercial Foodservice Learning Center Trainings had higher participation than the previous year.

The Company provided rebates to 11 participants that completed Building Operator Certification Training in 2024.

Benchmarking Services and EnergyStar Certification Assistance

The program achieved 145% of its participation goal while program spending was 104% of budget.

In 2024, a total of 20 rebates were paid for ENERGY STAR® certification. There were 1,888 users of the Energy Data Portal. Participation and new active users in the Energy Data Portal saw an increased rate of growth compared to the previous year. New statutory requirements for commercial building benchmarking are set to begin in 2025.⁵⁶ With the incoming deadline for benchmarking, the Company is encouraging customers to sign up for the Energy Data Portal to access building usage data. The Company is also starting up an Energy Data Portal support hotline for troubleshooting.

⁵⁶ See Minn. Stat. §216C.331

Recommissioning Study & Rebates

The program achieved 77% of its participation goal and 78% of its energy savings goal while program spending was 70% of budget.

In 2024, the Recommissioning program included 12 projects for study funding and 8 projects for implementation. 4 of the implementation projects in 2024 were claimed as influenced savings. These projects included low-cost and no-cost energy savings measures identified by a past study that did not qualify for an implementation rebate.

Multi-Family Building Efficiency

The program achieved 148% of its participation goal and 97% of its energy savings goal while program spending was 91% of budget.

MFBE continued to perform well in its second year after a 2023 program modification made significant updates to the program.⁵⁷

MFBE achieved its participation goal for whole buildings (see the table below). Several customers seeking MFBE rebates were previously participants in the C&I Heating and Water Heating program.

Multi-Family Building Efficiency: Participation Detail

MFBE Participation⁵⁸	Goal	Actual	Percent Achieved
Whole Building Participation	514	847	165%
Renter Kit Participation	57	0	0%
Totals	571	847	148%

On December 1, 2023, the Department issued a Decision on CenterPoint Energy's 2024-2026 *ECO Triennial Plan* that included an order that the Company report additional Multi-Family Building Efficiency program performance metrics for the 2024 ECO Status Report.⁵⁹ These metrics are shown in the table below.

⁵⁷ *In the Matter of CenterPoint Energy's 2021-2023 CIP Modification Request*, Docket No. G-008/CIP-20-478, Deputy Commissioner Decision, pp. 32-35 (Nov. 7, 2022).

⁵⁸ *In the Matter of CenterPoint Energy's 2024-2026 Natural Gas Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-23-95, p. 194 (Jan. 26, 2024)

⁵⁹ *In the Matter of CenterPoint Energy's 2024-2026 Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-23-95, p. 276 (Dec. 1, 2023).

Multi-Family Building Efficiency: Completed Program Steps⁶⁰

Building Type	Completed Program Step	Buildings	Units	Energy Savings	Rebates
Market Rate	Assessment	213	12,038	n/a	n/a
Market Rate	Direct Installation	179	7,267	8,459	n/a
Market Rate	Performance Incentives	34	n/a	55,318	\$583,586

⁶⁰ Building and unit participation listed in this table may appear to differ from total program participation because the MFBE project counts a building as participating if it receives at least one of the following: assessment, direct installation, or performance incentives.

Other Programs

CenterPoint Energy's Other Program spending was 87% of budget.

CenterPoint Energy submits 2024 year-end information on the following ECO programs:

- Analysis, Evaluation, & Project Development;
- Energy Efficiency Marketing & Awareness;
- Planning and Regulatory Affairs; and
- EZ Pay On-Bill Loan.

Information regarding the Minnesota Efficient Technology Accelerator market transformation program is included in this section. In addition, two alternative ECO Programs, EnerChange and Energy Smart, have been approved for inclusion in the Company's ECO programs. This section includes budgetary information regarding each alternative ECO program, but, as neither alternative ECO is administered by CenterPoint Energy, the Company asks that any requests for information regarding program activities be directed to the respective program administrators.

Other Programs Total	Program Spending	Program Participation	Energy Savings (Dth)	\$/Dth	BenCost Results (Minnesota Test)	BenCost Results (Societal Test)
Analysis, Evaluation, & Project Development	\$1,209,901	0	0	N/A	N/A	N/A
Energy Efficiency Marketing & Awareness	\$953,633	0	0	N/A	N/A	N/A
Planning & Regulatory Affairs	\$251,514	0	0	N/A	N/A	N/A
EZ Pay On-Bill Loan	\$274,352	210	0	N/A	N/A	N/A
MN ETA	\$1,121,321	0	0	N/A	N/A	N/A
Other Projects Total	\$3,810,721	210	0	N/A	N/A	N/A

Method Used to Determine Achievement of Low-Income and Renter Goals in the Other Programs Segment

The figures regarding low-income participation were established through a cross-check between CenterPoint Energy's ECO participation and Low-Income Home Energy Assistance Program ("LIHEAP") recipient records. Renter participation was established through a cross-check of rental data in CenterPoint Energy's customer information system.

Analysis, Evaluation, & Project Development

CenterPoint Energy's Analysis, Evaluation, & Project Development spending was 81% of budget.

Activities supporting the development of ECO projects included membership in the Gas

Technology Institute's ("GTI") Emerging Technology Program ("ETP"); membership in the Midwest Energy Efficiency Alliance ("MEEA"); membership in the Association of Energy Services Professionals; membership in the North American Gas Heat Pump Collaborative, and participation in various energy efficiency conferences. Company employee time was spent working to develop new ECO offerings, which is included in the total spending for this project, as are costs related to evaluation of existing ECO offerings by external consultants.

In the *2024-2026 ECO Triennial Plan*, CenterPoint Energy proposed a similar budget for this project for evaluation and research and development ("R&D") spending as compared to its last triennial period. The Company requested that only its true R&D spending be counted against the statutory cap on R&D, rather than the full project budget as had been the case in previous Triennial Plans. The Deputy Commissioner approved the request and directed the Company to include a narrative summary of its R&D activities, and the corresponding dollar amounts for each R&D activity, as part of the Company's annual status reports.⁶¹

Accordingly, the Company provides the following information regarding its 2024 R&D spending and activities. 2024 R&D spending totaled \$181,750 and included:⁶²

- \$116,750 for a field pilot of a technology to capture carbon from natural gas appliance flue gases. The pilot is intended to evaluate performance of the technology and assess energy savings benefits to establish whether it is appropriate to include the technology in future ECO programming. To-date, installation on 5 units as well as improvements to those units have been fully completed. This project is continuing in 2025 and will finish at the end of the year.
- \$40,000 for contributions to ACEEE research projects with other utilities, related to residential full home retrofit programs and workforce development.
- \$25,000 in support of GTI projects to field test emerging natural-gas driven technologies through the ETP.

In addition to the activities enumerated above, the Company participated in a Midwest Utility R&D Collaborative coordinated by MEEA. This effort began in 2018 with several midwestern utilities (including CenterPoint Energy, ComEd, Nicor Gas, Xcel Energy, DTE, and others) to share energy-efficiency related R&D results and progress in order to identify opportunities to collaborate, avoid duplication of effort, and learn from each other's work. There were no incremental costs associated with participation in the Collaborative in 2024.

⁶¹ *In the Matter of CenterPoint Energy's 2024-2026 Natural Gas Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-23-95, Deputy Commissioner Decision, p. 272 (Dec. 1, 2023).

⁶² In the Company's 2020 CIP Status Report, \$90,000 in support of a GTI project to field test emerging natural-gas driven heat pump water heaters was listed. Funds were collected by GTI for 2021, but the project was postponed until 2023. After administrative costs in 2021 of \$10,845, the remaining funds of \$79,155 were allocated to the GTI flex-fund to spend down in 2023-2024. In 2023, \$30,000 of the flex-fund was allocated to a Residential Hybrid Space Heat Techno-Market Study. In 2024, the remaining funds of about \$50,000 remained. Other projects funded through this mechanism will be reported in future ECO Status Reports.

Energy Efficiency Marketing & Awareness

Program spending was 95% of budget.

General awareness marketing and promotion of the entire energy efficiency portfolio of programs and services activities, directed at residential and business mass markets, and focusing on the benefits of energy efficiency and natural gas conservation included: network and cable television, Minnesota Public Radio and digital audio, digital (social media), web, paid search, print ads, local community events, and sports sponsorships with the University of Minnesota Gophers. The Energy Efficiency Marketing and Awareness program budget paid for these campaigns.

Planning and Regulatory Affairs

Program spending was 101% of budget.

Planning and Regulatory Affairs program expenditures include staff salaries; benefits; and expenses (such as computers, printing, phones, and postage) associated with managing, tracking, and administering CIP.

EZ Pay On-Bill Loan

The program achieved 105% of its participation goal while program spending was 53% of budget.

In 2024, the fourth full year of the program, the EZ Pay On-Bill Loan program ("EZPAY") funded 210 new loans, which provided CenterPoint Energy customers with financing for 308 efficient gas measures. 175 non-gas energy efficiency measures were also funded by the loans, primarily cooling equipment, but also including non-rebate eligible thermostats and a few water heaters. 106 customers who applied were not eligible to participate. 75 percent of those customers did not meet CenterPoint Energy's account eligibility requirements (e.g., account in arrears, rental property, etc.) and 25 percent of customers were not eligible for the loan according to the loan provider's requirements. Three customers were removed from the EZPAY program for non-payment of their loan or move-outs.

The Company increased the number of registered trade allies by 90% in 2024 by building awareness in its trade ally rebate program communications and annual in-person dealer meetings. The higher rebate amount for 97% furnaces (i.e., \$1,000) was a driver for furnaces financed in this measure category. 49% of 2024 loans had a 97% AFUE furnace financed through EZPAY, an increase of 580% from 2023. While there is potential economic uncertainty in 2025, the Company believes that there is a need for on-bill repayment especially as more customers may need financing to complete necessary equipment replacements.

Minnesota Efficient Technology Accelerator

The 92nd Minnesota Legislature (2021-2022) passed the Minnesota Efficient Technology Accelerator (“ETA”) which includes changes to the statutes governing ECO to allow for a nonprofit within Minnesota to run a market transformation program. The goal of this partnership is to:

- Drive a strategic process to accelerate market deployment of key technologies,
- Employ effective strategies to leverage market forces,
- Become a hub for collaboration among stakeholders, and
- Achieve cost-effective energy savings and other benefits for utilities and Minnesotans.

CEE began implementation of their 5-year ETA plan in 2023⁶³. The initial plan included 4 starter initiatives for gas or hybrid-fuel applications:

- Hybrid Air-Source Heat Pumps
- High-Performance Windows
- High-Performance Roof-top Units
- Gas Heat Pump Technologies

In 2024, a new initiative “Energy Codes and Standards Advancement” was added to ongoing projects.

Early projections for these technologies suggest they could significantly reduce customer bills while providing measurable societal benefits. While 2024 focused on launching new initiatives into the market, in 2025 the ETA plans to start claiming savings from the market effects of its activities.

In 2024, program spending was \$1,121,321. Costs associated with CenterPoint Energy staff participation are not included in this number. These costs are categorized within the appropriate program (e.g., windows through Home Insulation Rebates).

Because ETA is managed by CEE, CenterPoint Energy asks that any requests for additional information regarding program activity be directed to CEE. CenterPoint Energy participates in ETA through coordination committees as well as collaboration through ad hoc meetings on specific starter initiatives.

EnerChange

Program spending was 96% of budget.

⁶³ *Center for Energy and Environment’s Proposal to Implement the Minnesota Efficient Technology Accelerator, Under Minnesota Statute 216B.241, Section 17, Subdivision 14, Docket Number E,G999/CIP-21-548 (April 15, 2022).*

The EnerChange program was proposed for inclusion in the Company's ECO program by the National Initiative by Consumers of Energy d/b/a EnerChange ("EnerChange"). The Deputy Commissioner approved the EnerChange program with a total budget of \$375,440 for the 2024 program year.⁶⁴ The program is an indirect-impact conservation program for which no energy savings are claimed. EnerChange filed its Annual Program Status Report for 2024 on March 31, 2025, in Docket No. G-008/CIP-23-95. Because this program is an Alternative ECO program proposed and managed by EnerChange, CenterPoint Energy asks that any requests for additional information regarding program activity be directed to EnerChange.

Energy Smart

Program spending was 98% of budget.

The Energy Smart program was proposed for inclusion in the Company's ECO program by the Minnesota Waste Wise Foundation ("MWWF"). The Deputy Commissioner approved the Energy Smart program with a total budget of \$199,000 for the 2024 program year.⁶⁵ The program is an indirect-impact conservation program for which no energy savings are claimed. The Energy Smart annual report for 2024 was filed on April 1, 2025, in Docket No. G-008/CIP-23-95. Because this program is an Alternative ECO program proposed and managed by MWWF, CenterPoint Energy asks that any requests for additional information regarding program activity be directed to MWWF.

⁶⁴ *In the Matter of CenterPoint Energy's 2021-2023 Natural Gas Energy Conservation and Optimization Program Triennial Plan*, Docket No. G-008/CIP-23-95, Deputy Commissioner Decision, p. 283 (Dec. 1, 2023).

⁶⁵ *In the Matter of CenterPoint Energy's 2021-2023 Natural Gas Conservation and Optimization Program Triennial Plan*, Docket No. G-008/CIP-23-95, Deputy Commissioner Decision, p. 283 (Dec. 1, 2023).

Efficient Fuel Switching Programs

CenterPoint Energy's Efficient Fuel Switching ("EFS") Market Segment achieved 259% of the Segment's participation goal and 510% of the energy savings goal while spending was 453% of budget. Overperformance relative to the Company's plan was driven primarily by the Home Efficiency Rebates program.

CenterPoint Energy submits 2024 year-end information on the following EFS programs:

- Home Efficiency Rebates;
- Home Energy Squad;
- High-Efficiency Home;
- New Home Construction Rebates;
- Low-Income Weatherization;
- Low-Income Rental Efficiency;
- Homeowner Efficiency Redo Opportunity;
- Non-Profit Affordable Housing Rebates; and
- Energy Design Assistance.

EFS Market Segment	Program Spending	Program Participation	Energy Savings (Dth)	\$/Dth	BenCost Results (Minnesota Test)	BenCost Results (Societal Test)
Home Efficiency Rebates	\$2,700,497	1,661	43,473	\$62.12	1.16	0.92
Home Energy Squad	\$25,561	123	0	\$0.00	N/A	N/A
High-Efficiency Home	\$0	0	0	\$0.00	0.00	0.00
New Home Construction Rebates	\$0	0	0	\$0.00	0.00	0.00
Low-Income Weatherization	\$0	0	0	\$0.00	0.00	0.00
Low-Income Rental Efficiency	\$0	0	0	\$0.00	0.00	0.00
Homeowner Efficiency Redo Opportunity	\$0	0	0	\$0.00	0.00	0.00
Non-Profit Affordable Housing Rebates	\$29,889	2	74	\$401.98	0.49	0.82
Energy Design Assistance	\$0	0	0	\$0.00	0.00	0.00
EFS Total	\$2,755,947	1,786	43,548	\$63.29	1.15	0.92

Detailed descriptions of EFS Market Segment programs can be found in *CenterPoint Energy's 2024-2026 Energy Conservation and Optimization Triennial Plan*.⁶⁶

Method Used to Determine Achievement of Low-Income and Renter Goals for the EFS Market Segment

For residential programs, the figures regarding low-income participation were established through a cross-check between CenterPoint Energy's ECO participation and Low-Income Home Energy Assistance Program ("LIHEAP") recipient records. For low-income programs, low-income status of residential customer participants was verified by third party agencies such as Community Action, program vendors, and non-profit affordable housing agencies. Low-income multi-family housing owners provided documentation to CenterPoint Energy showing pre-qualification for the Department of Energy Weatherization Assistance Program ("WAP"), certification for Minnesota Low-Income Rental Classification ("LIRC"), or other documentation including (but not limited to) participation in the project-based Section 8 voucher program. Renter participation was established either through a cross-check of rental data in CenterPoint Energy's customer information system or, when available, through third-party agency verification systems.

Renter participation was established through a cross-check of rental data in CenterPoint Energy's customer information system.

Home Efficiency Rebates

The program achieved 554% of its participation goal and 555% of its energy savings goal while program spending was 567% of budget.

The program performed very well with 1,661 hybrid heating systems rebated in 2024 with 72% of the systems being a heat pump with a 97% AFUE furnace. CenterPoint Energy attributes the higher-than-expected performance to the availability of multiple rebates and tax credits contributing to competitive pricing relative to air conditioning systems. Most customers installed a 97 percent AFUE furnace with the heat pump in order to optimize performance of their HVAC systems.

CenterPoint Energy found in 2024 that, on average, rebated ASHPs had a:

- Heating Capacity of about 29,000 btu/hr, lower than the 36,000 btu/hr estimated in the Company's plan
- Heating Seasonal Performance Factor 2 ("HSPF2") of 8.5, higher than the program's minimum requirement of 7.8 HSPF2
- Seasonal Energy Efficiency Ratio 2 ("SEER2") of about 16.9
- Switchover temperature of 28 degrees Fahrenheit, slightly lower than the 30 degrees estimated in the Company's plan.

⁶⁶ *In the Matter of CenterPoint Energy's 2024-2026 Natural Gas Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-23-95, Compliance Filing (Jan. 26, 2024).

Home Efficiency Rebates: EFS Metrics

Total Gross Dth Savings (Dth/yr)	63,919
Total Net Dth Savings (Dth/yr)	43,473
Total Annual Increase in Electricity Consumption (kWh/yr)	5,694,041
Total Annual Increase in Electricity Demand (kW)	650
Total Annual Source Energy Savings (million Btu/yr)	25,208
Total Annual Avoided Greenhouse Gas Emissions (lbs CO2/yr)	5,883,988

Following the Department's approval of the October 1, 2024, *Program Modification*, the HER program's ASHP rebate increased from \$500 in 2024 to \$1,100 in 2025.⁶⁷ ⁶⁸ The program modification also set significantly higher program budgets and goals to align with new expectations about program performance.

CenterPoint Energy will monitor the program's performance in 2025 in case further adjustments to program goals and budgets are needed.

Home Energy Squad

The program achieved 33% of its participation goal while program spending was 42% of budget. Please see the Home Energy Squad program description in the residential segment section for information about changes to program implementation.

No specific reason for performance was identified for participation results relative to plan other than CenterPoint Energy's triennial plan represents its best estimate of participation for a new market for the Company. Recommendations for ASHPs can vary depending on the conditions of a customer's home such as the level of weatherization. However, the Company expects that the customers who might be good candidates for ASHPs may change with changes in the market and changes to policy (e.g., electric utility winter heating rates).

⁶⁷ See *In the Matter of CenterPoint Energy's 2024-2026 ECO Triennial Plan Rebate Changes*, Docket No. G-008/CIP-23-95, DOC Decision, (December 2, 2024).

⁶⁸ After CenterPoint Energy increased the HER program's ASHP rebate from \$500 to \$1,100, Xcel Energy lowered the heating portion of its ASHP rebate for shared Xcel Energy/CenterPoint Energy customers by \$600 (to \$0). This decrease was due to Xcel Energy's geographic consistency policy, in which Xcel Energy pays the difference between \$1,100 (the heating portion of the ASHP rebate it offers to Xcel Energy gas customers) and the amount of the ASHP heating rebate offered by non-Xcel Energy natural gas utilities to Xcel Energy electric customers (\$500 previously and now \$0, in the case of CenterPoint Energy). The *Program Modification* did not change the total ASHP rebate amount for CenterPoint Energy gas/Xcel Energy electric shared customers. Instead, CenterPoint Energy now pays the entire \$1,100 heating portion of the ASHP rebate rather than just part of it.

High-Efficiency Homes

The program achieved 0% of its participation goal and 0% of its energy savings goal while program spending was 0% of budget. CenterPoint Energy did not have EFS program participation in 2024 and is not currently expecting projects for 2025.

New Home Construction Rebates

CenterPoint Energy did not expect program participation and did not have participation in 2024.

Low-Income Weatherization

CenterPoint Energy did not expect program participation and did not have participation in 2024.

Low-Income Rental Efficiency

CenterPoint Energy did not expect program participation and did not have participation in 2024, but there are potential program participants in the program pipeline.

Homeowner Efficiency Redo Opportunity

The program achieved 0% of its participation goal and 0% of its energy savings goal while program spending was 0% of budget. This was expected after the new program launch was delayed until 2025.

Non-Profit Affordable Housing Rebates

CenterPoint Energy did not expect EFS program participation in 2024, but there were two projects rebated. The Company worked with the Department to determine project documentation in alignment with point 6a from the *Department Decision*.⁶⁹

Non-Profit Affordable Housing Rebates: EFS Metrics

Total Gross Dth Savings (Dth/yr)	89
Total Net Dth Savings (Dth/yr)	74
Total Annual Increase in Electricity Consumption (kWh/yr)	4,216
Total Annual Increase in Electricity Demand (kW)	0.48
Total Annual Source Energy Savings (million Btu/yr)	121
Total Annual Avoided Greenhouse Gas Emissions (lbs CO2/yr)	13,700

⁶⁹ *In the Matter of CenterPoint Energy's 2024-2026 Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-23-95, et al., Deputy Commissioner Decision, p. 275 (December 1, 2023).

Energy Design Assistance

CenterPoint Energy did not have any EFS rebates in 2024 for this program, but there are potential participants in the program pipeline.

Total Program Cost-Benefit Analysis

The BenCosts provided below (and in Exhibit A) include the cost-benefit analyses for the Company's total 2024 ECO goals and actual results.⁷⁰

⁷⁰ Behavioral energy savings are reported consistent with *In the Matter of Inclusion of Behavioral Project Savings in Energy Conservation Improvement Programs and Shared Savings Demand-Side Management Financial Incentive Calculations*, Docket No. E,G-999/CI-08-133, *et al.*, Deputy Commissioner Decision (Apr. 26, 2012). In accordance with the Average Savings Method, the full savings for behavioral programs are used for BENCOST analyses; reduced savings are used elsewhere in the report. Alternative ECO project and ECO assessments are excluded from spending used in all BENCOST modeling.

Energy Conservation and Optimization Program (ECO)

BENEFIT COST FOR GAS CIPS -- Cost-Effectiveness Analysis

Company: **CenterPoint Energy**
 Project: **Total CenterPoint Energy ECO 2024 Goal**
(Full Behavioral Savings)

Input Data				First Year	Second Year	Third Year
1) Retail Rate (\$/Dth) =	\$7.49		16 Utility Project Costs			
Escalation Rate =	see input 1		16 a) Administrative & Operating Costs =	\$28,603,810.03	\$0.00	\$0.00
2) Non-Gas Fuel Retail Rate (\$/Fuel Unit) =	\$0.115		16 b) Incentive Costs =	\$29,201,895.57	\$0.00	\$0.00
Escalation Rate =	see input 2a		16 c) Total Utility Project Costs =	\$57,805,705.60	\$0.00	\$0.00
Non-Gas Fuel Units (e.g., kWh, Gallons, etc.) =	kWh		17) Direct Participant Costs (\$/Part.) =	\$206.85	\$0.00	\$0.00
3) Commodity Cost (\$/Dth) =	\$4.52		18) Participant Non-Energy Costs (Annual \$/Part.) =	\$0.00	\$0.00	\$0.00
Escalation Rate =	See input 1		Escalation Rate =	See input 2b	See input 2b	See input 2b
4) Demand Cost (\$/Dth/Yr) =	\$194.36		19) Participant Non-Energy Savings (Annual \$/Part)	\$0.00	\$0.00	\$0.00
Escalation Rate =	see input 1		Escalation Rate =	See input 2b	See input 2b	See input 2b
5) Peak Reduction Factor =	1.00%		20) Project Life (Years) =	10.57	-	-
6) Variable O&M (\$/Dth) =	\$0.0500		21) Avg. Dth/Part. Saved =	6.114421026	#DIV/0!	#DIV/0!
Escalation Rate =	see input 1		22) Avg Non-Gas Fuel Units/Part. Saved =	1 kWh	0 kWh	0 kWh
7) Non-Gas Fuel Cost (\$/Fuel Unit) =	\$0.04414		22a) Avg Additional Non-Gas Fuel Units/ Part. Used	3 kWh	0 kWh	0 kWh
Escalation Rate =	see input 7		23) Number of Participants =	340,350	-	-
8) Non-Gas Fuel Loss Factor	8.22%		24) Total Annual Dth Saved =	2,081,043	0	0
9) Gas Environmental Damage Factor (\$/Dth) =	\$ 3.83		25) Incentive/Participant =	\$85.80	#DIV/0!	#DIV/0!
Escalation Rate =	see Input 9		26) Environmental Compliance (% or \$/Dth)	1.40%		
10) Non Gas Fuel Enviro. Damage Factor (\$/Unit) =	\$0.02536		27) Market Price Effects (% or \$/Dth)	0.00		
Escalation Rate =	see input 10		28) Other Environmental	0.00		
11) Participant Discount Rate =	3.30%		29) Economic and Jobs (Macroeconomic)	0.00		
12) CIP Utility Discount Rate =	5.39%		30) Energy Security	0.00		
13) Societal Discount Rate =	3.30%		31) Energy Equity	0.00		
14) General Input Data Year =	2023		32) Utility Performance Incentives	\$6,600,691.24	\$0.00	\$0.00
15a) Project Analysis Year 1 =	2024		33) Credit and Collection Costs	0.00		
15b) Project Analysis Year 2 =	2025		34) Risk	0.00		
15c) Project Analysis Year 3 =	2026		35) Reliability	0.00		
			36) Resilience	0.00		
Cost Summary				Triennial NPV	Triennial B/C	
Utility Cost per Participant =	\$169.84	#DIV/0!	#DIV/0!	Ratepayer Impact Measure Test	(\$76,136,783)	0.64
Cost per Participant per Dth =	\$61.61	#DIV/0!	#DIV/0!	Utility Cost Test	\$68,144,296	2.06
Lifetime Energy Reduction (Dth)	22,891,475			Societal Test	\$123,433,599	2.16
Societal Cost per Dth	\$4.65			Participant Test	\$124,239,646	2.73
				Minnesota Test	\$164,632,138	3.52

Company: **CenterPoint Energy**
 Project: **CenterPoint Energy ECO 2024 Total Actual (Full Behavioral Savings)**

Input Data		First Year	Second Year	Third Year
1) Retail Rate (\$/Dth) =	\$ 8.72			
Escalation Rate =	see input 1			
2) Non-Gas Fuel Retail Rate (\$/Fuel Unit) =	\$0.115			
Escalation Rate =	see input 2a			
Non-Gas Fuel Units (e.g., kWh, Gallons, etc.) =	kWh			
3) Commodity Cost (\$/Dth) =	\$4.52			
Escalation Rate =	See input 1			
4) Demand Cost (\$/Dth/Yr) =	\$194.36			
Escalation Rate =	see input 1			
5) Peak Reduction Factor =	1.00%			
6) Variable O&M (\$/Dth) =	\$0.0500			
Escalation Rate =	see input 1			
7) Non-Gas Fuel Cost (\$/kWh) =	\$0.04414			
Escalation Rate =	see input 7			
8) Non-Gas Fuel Loss Factor	8.22%			
9) Gas Environmental Damage Factor (\$/Dth) =	\$3.83			
Escalation Rate =	see Input 9			
10) Non Gas Fuel Enviro. Damage Factor (\$/kWh) =	\$0.02536			
Escalation Rate =	see input 10			
11) Participant Discount Rate =	5.39%			
12) CIP Utility Discount Rate =	5.39%			
13) Societal Discount Rate =	3.30%			
14) General Input Data Year =	2023			
15a) Project Analysis Year 1 =	2024			
15b) Project Analysis Year 2 =	2025			
15c) Project Analysis Year 3 =	2026			
16 Utility Project Costs				
16 a) Administrative & Operating Costs =	\$28,246,833.60			
16 b) Incentive Costs =	\$34,458,694.72			
16 c) Total Utility Project Costs =	\$62,705,528.32	\$0.00	\$0.00	\$0.00
17) Direct Participant Costs (\$/Part.) =	\$173.60	\$0.00	\$0.00	\$0.00
18) Participant Non-Energy Costs (Annual \$/Part.) =	\$0.00	\$0.00	\$0.00	\$0.00
Escalation Rate =	See input 2b	See input 2b	See input 2b	See input 2b
19) Participant Non-Energy Savings (Annual \$/Part) =	\$0.00	\$0.00	\$0.00	\$0.00
Escalation Rate =	See input 2b	See input 2b	See input 2b	See input 2b
20) Project Life (Years) =	12.02	-	-	-
21) Avg. Dth/Part. Saved =	4.90	#DIV/0!	#DIV/0!	#DIV/0!
22) Avg Non-Gas kWh/Part. Saved =	0 kWh	0 kWh	0 kWh	0 kWh
22a) Avg Additional Non-Gas kWh/ Part. Used =	13 kWh	0 kWh	0 kWh	0 kWh
23) Number of Participants =	431,785	-	-	-
24) Total Annual Dth Saved =	2,117,267	0	0	0
25) Incentive/Participant =	\$79.81	#DIV/0!	#DIV/0!	#DIV/0!
26) Environmental Compliance (% or \$/Dth)	1.40%			
27) Market Price Effects (% or \$/Dth)	0.00			
28) Other Environmental	0.00			
29) Economic and Jobs (Macroeconomic)	0.00			
30) Energy Security	0.00			
31) Energy Equity	0.00			
32) Utility Performance Incentives	\$7,942,033.73	\$0.00	\$0.00	\$0.00
33) Credit and Collection Costs	0.00			
34) Risk	0.00			
35) Reliability	0.00			
36) Resilience	0.00			

Cost Summary	1st Yr	2nd Yr	3rd Yr	Test Results	Triennial NPV	Triennial B/C
Utility Cost per Participant =	\$145.22	#DIV/0!	#DIV/0!	Ratepayer Impact Measure Test	(\$113,487,066)	0.58
Cost per Participant per Dth =	\$65.02	#DIV/0!	#DIV/0!	Utility Cost Test	\$85,369,202	2.21
Lifetime Energy Reduction (Dth)	27,524,477			Societal Test	\$158,051,139	2.36
Societal Cost per Dth	\$4.23			Participant Test	\$159,342,405	2.95
				Minnesota Test	\$198,550,843	3.62

SECTION 2: 2024 DEMAND-SIDE MANAGEMENT FINANCIAL INCENTIVE REPORT

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, (“CenterPoint Energy” or the “Company”) submits this report in compliance with the Minnesota Public Utilities Commission’s (“Commission”) *Order Establishing Utility Performance Incentives for Energy Conservation* (“Order”) and the Commission’s Rules of Practice and Procedure.^{71 72}

CenterPoint Energy used the financial incentive mechanism approved by the Commission to calculate the requested financial incentive amount.⁷³ Details of the calculation of the financial incentive are included in Attachment A of this filing. The calculations also rely on the results of the BenCost cost-effectiveness analysis of the Company’s 2024 Energy Conservation and Optimization Program (“ECO”). In 2024, the Company elected to include cost-ineffective low-income projects for its cost-effectiveness testing used in the calculation of the financial incentive as permitted by statute.⁷⁴ The low-income segment is not cost-effective based on the Minnesota test. Attachment B shows 2024 ECO cost-effectiveness testing with low-income projects that are cost-ineffective as their inclusion improves overall ECO portfolio performance in 2024,⁷⁵ which results in total net benefits of \$198,550,843. The following table summarizes how removing the low-income segment changes the assessment of net benefits using the Minnesota test:

Adjustment to Energy Conservation and Optimization Net Benefits	
Minnesota Test Net Benefits with the Cost-Ineffective Low-Income Projects	\$198,550,843
Minnesota Test Net Benefits without the Cost-Ineffective Low-Income Projects	\$185,801,145

As permitted by Commission Order, CenterPoint Energy excluded the third-party EnerChange and Energy Smart projects from its financial incentive calculations;⁷⁶ the figures given here and in Attachments A and B reflect that election. Assessments under Minnesota Statute § 216B.241

⁷¹ As described in *In the Matter of Commission Review of Utility Performance Incentives for Energy Conservation Pursuant to Minn. Stat. § 216B.241, Subd. 2c*, Docket No. E,G-999/CI-08-133, Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan (Jan. 25, 2024).

⁷² Minn. R. Ch. 7829.

⁷³ See *Id.* 71.

⁷⁴ Minn. Stat. § 216B.241, Subd. 7i permits, at the discretion of the utility, the exclusion of low-income costs and benefits associated with any approved low-income gas ECO program from the calculation of net economic benefits for the purposes of calculating the financial incentive when these programs are not cost-effective.

⁷⁵ Low-Income Weatherization, Low-Income Rental Efficiency, Homeowner Efficiency Redo Opportunity Low-Income Free Heating System Tune-ups, Non-Profit Affordable Housing Rebates, Low-Income Multifamily Building Efficiency, Low-Income Support and Awareness.

⁷⁶ See *Id.* 71.

are also excluded from the calculation of the incentive in accordance with Commission Order.⁷⁷ The following table summarizes these adjustments to the Company's 2024 ECO spending:

Adjustments to Post-Year Spending	
Total Spending (from ECO Tracker Report)	\$64,027,295
Exclude Assessments	\$767,858
Exclude EnerChange and Energy Smart	\$553,909
Total Post-Year Spending	\$62,705,528

As detailed in the *2024 Energy Conservation and Optimization Status Report* section of this filing, the Company's total energy savings in 2024 were 1,890,592 dekatherms ("Dth"), or 1.29 percent of retail sales.⁷⁸ As shown in the worksheets in Attachment A, this level of performance qualifies the Company for a financial incentive award of up to 4 percent of the net benefits achieved with a cap limiting the incentive to no more than 20 percent of 2024 ECO expenditures. The potential to increase the expenditures cap to 25 percent of 2024 ECO expenditures is available to gas utilities that achieve 1.2% of retail energy sales savings. Four percent of 2024 net benefits is \$7,942,034, and 25 percent of 2024 spending is \$15,676,382. The tables below illustrate the calculation of the Company's ECO financial incentive based on the net benefits.

CenterPoint Energy's 2024 Financial Incentive as a Percent of Net Benefits without Regard to Expenditure Cap	
2024 Energy Savings	1,890,592 Dth
Energy Savings as Percent of Retail Sales	1.29%
2024 Net Benefits Achieved	\$198,550,843
Percent of Net Benefits Awarded at Percent of Retail Sales Avoided	4%
2024 Financial Incentive Eligibility Calculated as a Percent of Net Benefits	\$7,942,034

CenterPoint Energy's 2024 Financial Incentive Cap on ECO Program Expenditures	
2024 ECO Spending	\$62,705,528
Commission-approved Cap on Incentive as a Percent of Expenditures	25%
2024 Financial Incentive Eligibility Calculated as a Percent of ECO Expenditures	\$15,676,382

⁷⁷ See *Id.* 71.

⁷⁸ The Company's 2020-2022 three-year-average weather-normalized sales to non-ECO-exempt customers were 146,689,037 Dth. See Compliance Overview section.

CenterPoint Energy's 2024 ECO efforts will result in approximately \$190,608,810 in net benefits after the incentive.

Summary of CenterPoint Energy's 2024 Requested Financial Incentive	
Requested 2024 Financial Incentive	\$7,942,034
Requested Incentive as a Percent of Net Benefits Achieved	4%
2024 Total Net Benefits Achieved	\$198,550,843
2024 ECO Net Benefits After Requested Incentive	\$190,608,810

The Company respectfully requests the Commission approve CenterPoint Energy's 2024 ECO financial incentive in the amount of **\$7,942,034**, to be entered in the Company's ECO Tracker as of the issue date of the Commission's Order.

SECTION 3: ENERGY CONSERVATION AND OPTIMIZATION

TRACKER REPORT

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, (“CenterPoint Energy” or the “Company”) presents its Energy Conservation and Optimization (“ECO”) Tracker activity in the table at the end of this section and in Exhibit B.

The 2024 ECO Tracker Report beginning balance was \$6,131,707.^{79 80} The ending balance on December 31, 2024, was \$23,652,462.⁸¹ The 2024 ECO Tracker Report reflects recovery of the interim Conservation Cost Recovery Charge (“CCRC”) of \$0.3204 per dekatherm (“Dth”) from the 2023 rate case. This interim rate went into effect on January 1, 2024, through December 31, 2024.⁸² The amount recovered via the CCRC is reflected in line 10.

On September 5, 2023, the Commission approved a Conservation Cost Recovery Adjustment (“CCRA”) of \$0.0926 per Dth.⁸³ The new CCRA rate went into effect October 1, 2023. On November 8, 2024, the Commission approved a CCRA of \$0.1704 per Dth.⁸⁴ The new CCRA rate went into effect December 1, 2024. The amount recovered via the CCRA is reflected in the table (line 13) at the end of this section. See Section 4 of this filing for more discussion of the new CCRA proposal.

Monthly ECO expenses are shown in the table as a single total (line 2). These deferred expense totals include assessments made by the Department of Commerce under Minnesota Statutes § 216B.241. These assessments have not been included in the total ECO spending reported in Section 1 of this filing but are included in the ECO Tracker because Minnesota statute provides for utilities to recover the assessments through the ECO Tracker mechanism.⁸⁵ Spending on alternative third-party ECO programs is also excluded from total spending reported in Section 1 of this filing but included in the ECO Tracker. As described in Section 1, total ECO spending in 2024 was \$62,705,528; the assessments totaled \$767,858 and spending on alternative third-party ECO programs totaled \$553,909, resulting in total recoverable ECO expenses of

⁷⁹ *In the Matter of CenterPoint Energy Minnesota Gas’ Natural Gas Conservation Improvement Program 2023 Status Report & Associated Compliance Filings*, Docket No. G-008/M-24-43, Ordering Point 2 (Nov. 8, 2024).

⁸⁰ PUC Ordering Point 2 approved the 2024 ECO Tracker Report beginning positive balance of \$6,131,707, but it was misdescribed as an over recovery.

⁸¹ A positive balance indicates under-recovery and a negative balance indicates an over-recovery.

⁸² *In the Matter of the Application by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G-008/GR-23-173, (Jan. 2, 2024).

⁸³ *In the Matter of CenterPoint Energy’s 2022 Conservation Improvement Program (CIP) Cost Recovery*, Docket No. G-008/M-23-182, Ordering Point 3 (Sept. 5, 2023).

⁸⁴ *In the Matter of CenterPoint Energy Minnesota Gas’ Natural Gas Conservation Improvement Program 2023 Status Report & Associated Compliance Filings*, Docket No. G-008/M-24-43, Ordering Point 3 (Nov. 8, 2024).

⁸⁵ Minn. Stat. § 216B.241, subd. 2b.

\$64,027,295 in 2024. Assessments and alternative third-party ECO spending were also excluded from the calculation of the financial incentive requested in Section 2 of this filing.

Miscellaneous Expenses

Included in the 2024 ECO expenses are various meals, travel, and miscellaneous ECO-related expenses.⁸⁶

CenterPoint Energy believes it is necessary and reasonable to spend a modest amount of ratepayer funds on meals, travel, and miscellaneous expenses to encourage participation in the Company's ECO projects and to educate staff on new energy efficiency technologies and best practices for program design and delivery. Examples of reasonable and necessary expenses supporting ECO include dues for Company membership in energy efficiency-related organizations, employee participation in energy efficiency workshops and conferences, employee training, and a variety of miscellaneous expenses such as program related mileage and parking expenses for employees involved in delivering and promoting ECO.

These miscellaneous expenses of \$75,495 are 0.12 percent of the total non-assessment, non-third party-alternative ECO, expenses included for recovery in this docket (\$62,705,528). The total amount of 2024 spending in each miscellaneous expense category is as follows:

Category	Expense
Meals	\$10,185
Entertainment	\$0
Miscellaneous (Subtotal)	\$48,570
<i>In Town Parking and Mileage</i>	\$6,822
<i>Employee Training</i>	\$900
<i>Conference Registration Fees</i>	\$7,418
<i>Membership Dues</i>	\$25,201
<i>Employee Professional Dues/Licenses</i>	\$278
<i>Awards and Gifts</i>	\$7,951
<i>Other Miscellaneous Expenses</i>	\$0
Employee Travel	\$16,739
Total	\$75,495

The various categories listed above are generally defined as follows:

"Meals" includes expenses for meals taken with customers, vendors, or other employees at which specific Company business discussions take place or meals taken by the employee while away from their normal work location on a business day trip.

⁸⁶ Minn. Stat. § 216B.16, subd. 17.

“Entertainment” includes expenses for outings with customers, clients, vendors, or others who are seeking to do business with the Company to clubs, theaters, or sporting events, *etc.* when a business discussion takes place immediately before, during, or immediately after the event.

“Miscellaneous Subtotal” includes other business-related expenses not specifically covered under another expense category. CenterPoint Energy has further divided this expense category into the following subcategories: in-town parking and mileage expenses, employee training expenses, conference registration fees, fees for membership in various organizations,⁸⁷ employee professional dues and license fees, awards and gifts,⁸⁸ and other miscellaneous expenses.

“Employee Travel” includes expenses incurred while on a business trip requiring an overnight stay, including items such as airfare, lodging, and travel meals for the employee.

CenterPoint Energy tracks ECO-related spending separately from other utility spending, using Federal Energy Regulatory Commission account numbers to ensure that conservation-related expenses are not recorded in non-conservation accounts and vice-versa. This, in turn, ensures ratepayers are not charged twice for a single expense; conservation expenses are approved through the annual ECO Tracker filings while non-conservation expenses are addressed in other proceedings (*e.g.*, utility rate cases). The ECO-related expenses are incorporated into the Company’s ECO BENCOST analysis through their inclusion in the Company’s total ECO spending for 2024.

⁸⁷ In 2024, most expenses included in this subcategory represent fees for Company membership in the Energy Solutions Center’s Industrial and Foodservice consortia, the Gas Technology Institute Emerging Technologies Program, the Midwest Energy Efficiency Alliance, Minnesota Blue Flame Gas Association, and the Consortium for Energy Efficiency.

⁸⁸ CenterPoint Energy incentivizes its customer service representatives to promote ECO by providing gift cards to call center employees who refer commercial and industrial customers to ECO offerings. The majority of expenses included in the 2024 awards and gifts subcategory are gift cards provided through this incentive program.

CenterPoint Energy Minnesota Gas

ECO Tracker and Balance

2024 Actuals with New CCRA starting Dec 2024

CCRC interim rate approved in the 2023 rate case (Docket No. G-008/GR-23-173)

Approved CCRA rate (Jan-Nov) of \$0.0926/Dth (Docket No. G-008/M-23-182)

Approved CCRA rate (Dec) of \$.1704/Dth (Docket No. G-008/M-24-43)

	Jan 24	Feb 24	Mar 24	Apr 24	May 24	June 24	July 24	Aug 24	Sept 24	Oct 24	Nov 24	Dec 24	Annual Summary
Expenses	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	
1 Beginning Tracker Balance (\$) - Under / (Over) Recovered	6,131,707	2,334,099	(4,131,882)	(9,304,036)	(10,960,403)	(10,470,248)	(6,839,094)	(3,898,410)	(2,324,528)	1,074,648	4,708,137	15,985,925	6,131,707
2 ECO Program Expenditures	4,294,824	2,783,473	1,674,071	4,561,087	4,010,291	5,640,313	4,738,835	3,294,007	5,088,918	5,649,489	5,929,460	16,362,527	64,027,295
3 Performance Incentive	-	-	-	-	-	-	-	-	-	-	8,450,662	-	8,450,662
4 Total Expenses & Incentive (Line 1 + Line 2 + Line 3)	10,426,531	5,117,572	(2,457,811)	(4,742,949)	(6,950,113)	(4,829,935)	(2,100,259)	(604,403)	2,764,391	6,724,137	19,088,259	32,348,452	78,609,664
Recovery													
5 Total Volumes (Dt)	24,695,471	26,747,567	20,352,420	18,975,586	10,577,256	8,850,470	7,966,039	9,119,146	8,648,950	7,885,988	10,643,104	22,269,376	176,731,372
6 Exemptions (Dt)	4,173,173	4,354,289	3,780,997	3,927,536	2,059,973	3,989,694	3,614,528	4,955,684	4,557,150	3,002,186	3,122,641	3,932,746	45,470,596
7 Volumes less Exemptions (Dt) (Line 5 - Line 6)	20,522,297	22,393,278	16,571,423	15,048,050	8,517,284	4,860,777	4,351,511	4,163,462	4,091,801	4,883,802	7,520,463	18,336,630	131,260,777
8 Base Interim Rate Cost Recovery (CCRC) (per Dt)	0.3204	0.3204	0.3204	0.3204	0.3204	0.3204	0.3204	0.3204	0.3204	0.3204	0.3204	0.3204	
9 Adjustment for interim CCRC rate implementation	382,814	-	-	-	-	-	-	-	-	-	-	-	382,814
10 CCRC Recovery (\$) (Line 7 x Line 8 + Line 9)	(6,192,530)	(7,174,806)	(5,309,484)	(4,821,395)	(2,728,938)	(1,557,393)	(1,394,224)	(1,333,973)	(1,311,013)	(1,564,770)	(2,409,556)	(5,875,056)	(41,673,139)
11 Base CCRA (per Dt)	0.0926	0.0926	0.0926	0.0926	0.0926	0.0926	0.0926	0.0926	0.0926	0.0926	0.0926	0.1704	
12 Adjustment for CCRA rate implementation	-	-	-	-	-	-	-	-	-	-	-	298,238	298,238
13 CCRA Recovery (\$) (Line 7 x Line 11)	(1,900,365)	(2,073,618)	(1,534,514)	(1,393,449)	(788,700)	(450,108)	(402,950)	(385,537)	(378,901)	(452,240)	(696,395)	(2,826,324)	(13,283,100)
14 Total Recovery (Line 10 + Line 12)	(8,092,895)	(9,248,424)	(6,843,998)	(6,214,845)	(3,517,638)	(2,007,501)	(1,797,174)	(1,719,510)	(1,689,914)	(2,017,010)	(3,105,951)	(8,701,380)	(54,956,239)
Carrying Charges													
15 Sub-Balance (\$) (Line 4 + Line 13)	2,333,636	(4,130,851)	(9,301,809)	(10,957,793)	(10,467,751)	(6,837,436)	(3,897,432)	(2,323,913)	1,074,477	4,707,126	15,982,308	23,647,072	23,653,426
16 Deferred Income Tax ([Line 14 - Line 1] x 28.742%)	1,091,641	1,858,156	1,485,940	475,323	(141,598)	(1,044,143)	(845,492)	(452,542)	(976,942)	(1,044,047)	(3,240,422)	(2,201,967)	
17 ADIT (Line 15 + Line 16 prior month)	(906,353)	951,803	2,437,744	2,913,066	2,771,468	1,727,325	881,833	429,291	(547,651)	(1,591,698)	(4,832,120)	(7,034,087)	
18 Net Investment (Line 14 + Line 16)	1,427,283	(3,179,048)	(6,864,066)	(8,044,727)	(7,696,283)	(5,110,110)	(3,015,599)	(1,894,622)	526,826	3,115,428	11,150,188	16,612,985	
19 Carrying Charge Rate	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	
20 Carrying Charge (Line 17 x Line 18)	463	(1,031)	(2,227)	(2,610)	(2,497)	(1,658)	(978)	(615)	171	1,011	3,617	5,390	(964)
21 Ending Tracker Balance - Under / (Over) Recovered (Line 14 + Line 19)	2,334,099	(4,131,882)	(9,304,036)	(10,960,403)	(10,470,248)	(6,839,094)	(3,898,410)	(2,324,528)	1,074,648	4,708,137	15,985,925	23,652,462	23,652,462

Notes on the ECO Tracker Report:

1. Line 1: January beginning balance is equal to the December 31, 2023, ending balance of \$6,131,707, approved in *In the Matter of CenterPoint Energy Minnesota Gas' Natural Gas Conservation Improvement Program 2023 Status Report & Associated Compliance Filings*, Docket No. G-008/M-24-43, Ordering Point 2 (Nov. 8, 2024).
2. Line 2: ECO expenditures include all program expenses as well as all assessments made by the Department of Commerce under Minnesota Statute § 216B.241.
3. Line 3: The Company's 2023 CIP Financial Incentive, approved in *In the Matter of CenterPoint Energy Minnesota Gas' Natural Gas Conservation Improvement Program 2023 Status Report & Associated Compliance Filings*, Docket No. G-008/M-24-43, Ordering Point 1 (Nov. 8, 2024).
4. Line 8: The interim CCRC in the amount of \$0.3204 per Dth was implemented as a part of the 2023 rate case. *In the Matter of the Application by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, for Authority to Increase Rates for Natural Gas Utility Service in Minnesota*, Docket No. G-008/GR-23-173, (Nov. 1, 2023) and went into effect January 1, 2024.
5. Line 9 (Jan.): Upon implementation of an interim CCRC rate, the Company's ECO Tracker account was adjusted to account for the misalignment of the Company's billing cycle with the January 1, 2024, effective date of the new CCRC.
6. Line 11: The CCRA in the amount of \$0.0926 per Dth was implemented October 1, 2023, pursuant to *In the Matter of CenterPoint Energy's 2022 Conservation Improvement Program (CIP) Cost Recovery*, Docket No. G-008/M-23-182, Ordering Point 3 (Sept. 5, 2023). The CCRA in the amount of \$0.1704 per Dth was implemented December 1, 2024, pursuant to *In the Matter of CenterPoint Energy Minnesota Gas' Natural Gas Conservation Improvement Program 2023 Status Report & Associated Compliance Filings*, Docket No. G-008/M-24-43, Ordering Point 3 (Nov. 8, 2024).
7. Line 12 (Dec.): Upon implementation of the current CCRA, the Company's ECO Tracker account was adjusted to account for the misalignment of the Company's billing cycle with the December 1, 2024, effective date of the new CCRA.
8. Line 17: ADIT in each month is calculated based on monthly deferred income tax and the previous month's ADIT.
9. Line 20: From January 2024 through December 2024, the short-term debt interest factor (0.39%) used to calculate carrying charges is a monthly factor calculated from the annual rates specified in the 2021 rate case from *In the Matter of the Application of CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, for Authority to Increase Rates for Natural Gas Utility Service in Minnesota*, Docket No. G-008/GR-21-435, Order (Jan. 17, 2023).

Carrying Charges

The calculation of carrying charges in the 2024 ECO Tracker for January is based on the short-term interest factor used in the 2021 rate case settlement.⁸⁹

The 2024 year-end ECO Tracker under-recovered balance of \$23,652,462 includes -\$964 in 2024 carrying charges in the customers' favor. The calculation of the monthly interest factor is shown below.

From January Through December:

$$\begin{aligned}\text{Annual Interest Factor} &= \text{Cost of Short-Term Debt} \\ &= 0.39\%\end{aligned}$$

$$\begin{aligned}\text{Monthly Interest Factor} &= ((1 + \text{Annual Interest Factor}) ^ (1/12)) - 1 \\ &= ((1 + 0.039) ^ (1/12)) - 1 \\ &= 0.0012 \\ &= 0.03\%\end{aligned}$$

⁸⁹ *In the Matter of the Application of CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, for Authority to Increase Rates for Natural Gas Utility Service in Minnesota*, Docket No. G-008/GR-21-435, Order (Jan. 17, 2023).

SECTION 4: CONSERVATION COST RECOVERY ADJUSTMENT PROPOSAL

Overview

On October 31, 2024, the Commission approved the request of CenterPoint Energy to implement the Conservation Cost Recovery Adjustment (“CCRA”) in the amount of \$0.1704 per Dth, which went into effect on December 1, 2024.⁹⁰ The purpose of the CCRA is to allow the Company to recover approved Energy Conservation and Optimization (“ECO”) expenses not recovered through the Conservation Cost Recovery Charge (“CCRC”), which is included in base rates. The Commission has required CenterPoint Energy to file its requests to modify the CCRA along with its ECO Tracker and Financial Incentive filings on May 1 of each year.⁹¹

With this filing, CenterPoint Energy proposes to increase the CCRA to \$0.1885 per Dth beginning October 1, 2025. This rate is designed to reduce the ECO Tracker balance close to zero by the end of 2026. In the event that Commission approval of the proposed adjustment is delayed beyond September 19, 2025 (in order to implement the rate change by October 1), the Company will continue to apply the current CCRA of \$0.1704 per Dth up to the first of the month following Commission approval of a revised factor. In this case, the Company may recalculate the CCRA.

Projection Assumptions

To evaluate a new CCRA proposal, CenterPoint Energy projected ECO spending and recovery for 2025 and 2026. Projections for 2025 and 2026 can be found in Attachments C-1 and C-2. On December 1, 2023, the Department approved the Company’s *2024-2026 ECO Triennial Plan*.⁹² ⁹³ Therefore, for both 2025 and 2026, ECO spending was based on the currently approved budget for 2025 of \$60,869,188 (which includes the 2025 Minnesota Efficient Technology Accelerator budget of \$2,084,884),⁹⁴ except for January through March in 2025,

⁹⁰ *In the Matter of CenterPoint Energy Minnesota Gas’ Natural Gas Conservation Improvement Program 2023 Status Report & Associated Compliance Filings*, Docket No. G-008/M-24-43, Ordering Point 3 (Nov. 8, 2024).

⁹¹ *In the Matter of a Petition by CenterPoint Energy for Approval of its 2009 CIP Tracker Account and DSM Financial Incentive*, Docket No. G-008/M-10-416, G-008/M-10-634, Ordering Point 4 (Oct. 11, 2010).

⁹² *In the Matter of CenterPoint Energy’s 2024-2026 Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-23-95 et al., Deputy Commissioner Decision (Dec. 1, 2023). See the final version of the *2024-2026 ECO Plan* filed on January 26, 2024, as a *Compliance Filing*.

⁹³ For the current budget, see the latest program modification. *In the Matter of CenterPoint Energy’s 2024-2026 Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-23-95 (Mar. 27, 2025).

⁹⁴ *In the Matter of Compliance Filing for the Minnesota Efficient Technology Accelerator*, Docket No. G-008/CIP-23-95, (Dec. 21, 2023).

which reflects actual spending, and the currently approved budget for 2026 of \$64,383,293 (which includes the 2026 Minnesota Efficient Technology Accelerator estimated budget of \$2,218,303). Sales volumes for 2025 are taken from the 2023 rate case and used for 2025-2026 projections,⁹⁵ again, except for January through March of 2025, which reflect actual volumes. The projections use the interim CCRC (\$0.3407 per Dth), from the 2023 rate case,⁹⁶ which is in effect as of January 1, 2025. The Company calculated carrying charges using the settlement short-term debt interest factor (0.39%) from the Company's 2021 rate case for the rest of 2025 and 2026.⁹⁷

In the Company's projections for 2025, it is assumed the Company will receive the Financial Incentive requested in this filing. In the Company's projections for 2026, it is assumed the Company will receive a Financial Incentive determined by applying the mechanism approved by the Commission for the *2024-2026 Energy Conservation and Optimization Triennial Plan* to the Company's estimated net benefits for 2025.^{98 99}

The mechanism for the 2024-2026 triennium caps the Financial Incentive that a utility is eligible for to a specified percent of the utility's ECO net program benefits based on the Minnesota test. The Company's 2026 projections (i.e., 2025 ECO performance) reflect an incentive of 4.0 percent of its estimated 2025 program net benefits of \$165,555,575. The incentive was rounded to \$6,600,000 for use in projections. The Company realizes the incentives may differ from these estimates depending on the performance of the Company's ECO portfolio in 2025, but the Company believes that assuming a financial incentive based on 4.0 percent of estimated net benefits for the 2025 plan is the best way calculate the 2025 financial incentive in 2026.¹⁰⁰

All the projections referenced here are included in the Attachments Section of this filing.

⁹⁵ *In the Matter of the Application by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G-008/GR-23-173, Schedules 10 and 13 (Sept. 27, 2023).

⁹⁶ *In the Matter of the Application by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G-008/GR-23-173, Compliance Filing (Jan. 2, 2024).

⁹⁷ As approved by the Commission in *In the Matter of the Application by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas (CPE) for Authority to Increase Natural Gas Utility Service in Minnesota*, Docket No. G-008/GR-21-435, Order (Mar. 23, 2022).

⁹⁸ *In the Matter of Commission Review of Utility Performance Incentives for Energy Conservation*, Docket No. E,G-999/CI-08-133, Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan (Jan. 25, 2024).

⁹⁹ *In the Matter of CenterPoint Energy's 2024-2026 Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-23-95 et al., Deputy Commissioner Decision (Dec. 1, 2023).

¹⁰⁰ The projections show the financial incentives for each year in October. On an actual basis, the ECO Tracker will incorporate the incentive when it is approved by Commission Order.

Projection Results and Proposal

Projections for 2025 and 2026 (Attachments C-1 and C-2) show that an increase in the CCRA to \$0.1885 per Dth taking effect on October 1, 2025, and remaining in effect through 2026 would achieve a near-zero ECO Tracker balance by the end of 2026.

CenterPoint Energy has in the past proposed to make modifications to the CCRA on October 1 of the year following the proposal and in prior years the Commission approved a CCRA modification for October 1 or shortly after in Q4.¹⁰¹ The Company proposes to increase the CCRA to \$0.1885 per Dth effective October 1, 2025.

A revised proposed tariff page (based on approved tariffs) is included as Attachment E to this filing, and the Company proposes the following bill message:

The PUC has approved a Conservation Cost Recovery Adjustment (CCRA) factor of \$0.01885 per therm. This charge will be used to fund energy conservation activities and has been added to your delivery charge. For more information, please call or visit our website.

As approved in 2024,¹⁰² a phone number and website address are not included in this bill message. If a customer has questions, the phone number and website address they should contact already appears near the bill message on the customer's bill.

¹⁰¹ *In the Matter of CenterPoint Energy Minnesota Gas' Natural Gas Conservation Improvement Program 2023 Status Report & Associated Compliance Filings, Docket No. G-008/M-24-43, Ordering Point 3 (Nov. 8, 2024).*

¹⁰² See *Id.* 101, Ordering Point 4.

SECTION 5: ATTACHMENTS

Attachment A: DSM Financial Incentive Mechanism – 2024 Financial Incentive Calculations

Attachment B: Total Program Cost-Benefit Analysis without the Low-Income Segment

Attachment C-1: ECO Tracker and Balance Projections for 2025 with New CCRA Starting in October 2025

Attachment C-2: ECO Tracker and Balance Projections for 2026 with New CCRA Starting in October 2025

Attachment D: Detailed Energy Savings Information for Projects with Deemed Savings Measures

Attachment E: Revised Tariff Page

Attachment A: DSM Financial Incentive Mechanism – 2024 Financial Incentive Calculations

The following pages contain the worksheet used to calculate the requested 2024 Financial Incentive taken from the spreadsheet provided by the Minnesota Department of Commerce.

2024

CenterPoint Energy

Inputs	
2020 Weather-Normalized Sales (Dth)	145,364,995
2021 Weather-Normalized Sales (Dth)	146,912,933
2022 Weather-Normalized Sales (Dth)	147,789,182
3-year Weather-Normalized Sales Average (Dth)	146,689,037
1.0% Energy Savings	1,466,890
Increase Energy Savings per 0.1% Increase in Achievement Level	146,689
Approved CIP Budget	\$57,805,706
Approved CIP Energy Savings Goal (Dth)	1,874,218
Estimated Net Benefits at Energy Savings Goal	\$164,632,138
Energy savings at 1.5% (Dth)	2,200,336
Incentive Calibration	
Max Percent of Net Benefits Awarded	4.0%
Max Percent of Expenditures Awarded	25.0%
Earning Threshold	0.7%
Achievement Level Where Net Benefits Cap Begins	1.2%
Increase in Net Benefits Awarded Per 0.1% Increase in Achievement Level	4.2
Actual 2024 Achievements	
Expenditures	\$62,705,528
Energy Saved (first year Dth saved)	1,890,592
Net Benefits Achieved	\$198,550,843
Shared Savings Incentive Results	
Achievement Level	1.29%
Percent of Net Benefits Awarded	4.0000%
Financial Incentive Award	\$7,942,034
Incentive/First Year Dth Saved \$	\$4.2008
Incentive/Net Benefits	4.00%
Incentive/CIP Expenditures	12.67%

Estimated Incentive Levels by Achievement Level

Achievement Level (% of sales)	Energy Saved	Percent of Net Benefits Awarded	Estimated Net Benefits Achieved	Incentive Award	Average Incentive per unit Saved	Incremental Incentive Units Saved
0.0%	0	0.00%	\$0	\$0	\$0.000	-
0.1%	146,689	0.00%	\$12,885,232	\$0	\$0.000	\$0.000
0.2%	293,378	0.00%	\$25,770,465	\$0	\$0.000	\$0.000
0.3%	440,067	0.00%	\$38,655,697	\$0	\$0.000	\$0.000
0.4%	586,756	0.00%	\$51,540,929	\$0	\$0.000	\$0.000
0.5%	733,445	0.00%	\$64,426,161	\$0	\$0.000	\$0.000
0.6%	880,134	0.00%	\$77,311,394	\$0	\$0.000	\$0.000
0.7%	1,026,823	1.90%	\$90,196,626	\$1,713,736	\$1.669	\$11.683
0.8%	1,173,512	2.32%	\$103,081,858	\$2,391,499	\$2.038	\$4.620
0.9%	1,320,201	2.74%	\$115,967,090	\$3,177,498	\$2.407	\$5.358
1.0%	1,466,890	3.16%	\$128,852,323	\$4,071,733	\$2.776	\$6.096
1.1%	1,613,579	3.58%	\$141,737,555	\$5,074,204	\$3.145	\$6.834
1.2%	1,760,268	4.00%	\$154,622,787	\$6,184,911	\$3.514	\$7.572
1.3%	1,906,957	4.00%	\$167,508,019	\$6,700,321	\$3.514	\$3.514
1.4%	2,053,647	4.00%	\$180,393,252	\$7,215,730	\$3.514	\$3.514
1.5%	2,200,336	4.00%	\$193,278,484	\$7,731,139	\$3.514	\$3.514
1.6%	2,347,025	4.00%	\$206,163,716	\$8,246,549	\$3.514	\$3.514
1.7%	2,493,714	4.00%	\$219,048,948	\$8,761,958	\$3.514	\$3.514
1.8%	2,640,403	4.00%	\$231,934,181	\$9,277,367	\$3.514	\$3.514
1.9%	2,787,092	4.00%	\$244,819,413	\$9,792,777	\$3.514	\$3.514
2.0%	2,933,781	4.00%	\$257,704,645	\$10,308,186	\$3.514	\$3.514
2.1%	3,080,470	4.00%	\$270,589,877	\$10,823,595	\$3.514	\$3.514
2.2%	3,227,159	4.00%	\$283,475,110	\$11,339,004	\$3.514	\$3.514
2.3%	3,373,848	4.00%	\$296,360,342	\$11,854,414	\$3.514	\$3.514
2.4%	3,520,537	4.00%	\$309,245,574	\$12,369,823	\$3.514	\$3.514
2.5%	3,667,226	4.00%	\$322,130,806	\$12,885,232	\$3.514	\$3.514
2.6%	3,813,915	4.00%	\$335,016,039	\$13,400,642	\$3.514	\$3.514
2.7%	3,960,604	4.00%	\$347,901,271	\$13,916,051	\$3.514	\$3.514
2.8%	4,107,293	4.00%	\$360,786,503	\$14,431,460	\$3.514	\$3.514
2.9%	4,253,982	4.00%	\$373,671,735	\$14,946,869	\$3.514	\$3.514
3.0%	4,400,671	4.00%	\$386,556,968	\$15,462,279	\$3.514	\$3.514

Attachment B: Total Program Cost-Benefit Analysis without the Low-Income Segment

The BenCosts provided below include the cost-benefit analyses for the Company's total 2024 ECO goals and actual results excluding cost-ineffective low-income programs.¹

¹ Behavioral energy savings are reported consistent with *In the Matter of Inclusion of Behavioral Project Savings in Energy Conservation Improvement Programs and Shared Savings Demand-Side Management Financial Incentive Calculations*, Docket No. E,G-999/CI-08-133, *et al.*, Deputy Commissioner Decision (DOC, Apr. 26, 2012). In accordance with the Average Savings Method, the full savings for behavioral programs are used for BenCost analyses; reduced savings are used elsewhere in the report. Alternative ECO project and ECO assessments are excluded from spending used in all BenCost modeling.

Energy Conservation and Optimization Program (ECO)

BENEFIT COST FOR GAS CIPS -- Cost-Effectiveness Analysis

Company: **CenterPoint Energy**
Project: **CenterPoint Energy ECO 2024 Total Actual (Full Behavioral Savings)**

Input Data					First Year	Second Year	Third Year
1) Retail Rate (\$/Dth) = Escalation Rate =	\$ 8.79 see input 1			16 Utility Project Costs 16 a) Administrative & Operating Costs = 16 b) Incentive Costs = 16 c) Total Utility Project Costs =	\$19,354,356.03 \$33,873,244.72 \$53,227,600.75		\$0.00 \$0.00
2) Non-Gas Fuel Retail Rate (\$/Fuel Unit) = Escalation Rate = Non-Gas Fuel Units (e.g., kWh,Gallons, etc.) =	\$0.115 see input 2a kWh			17) Direct Participant Costs (\$/Part.) =	\$173.11	\$0.00	\$0.00
3) Commodity Cost (\$/Dth) = Escalation Rate =	✓ \$4.52 See input 1			18) Participant Non-Energy Costs (Annual \$/Part.) = Escalation Rate =	\$0.00 See input 2b	\$0.00 See input 2b	\$0.00 See input 2b
4) Demand Cost (\$/Dth/Yr) = Escalation Rate =	\$194.36 see input 1			19) Participant Non-Energy Savings (Annual \$/Part) = Escalation Rate =	\$0.00 See input 2b	\$0.00 See input 2b	\$0.00 See input 2b
5) Peak Reduction Factor =	1.00%			20) Project Life (Years) =	11.96	-	-
6) Variable O&M (\$/Dth) = Escalation Rate =	\$0.0500 see input 1			21) Avg. Dth/Part. Saved =	✓ 4.89	#DIV/0!	✓ #DIV/0!
7) Non-Gas Fuel Cost (\$/kWh) = Escalation Rate =	✓ \$0.04414 see input 7			22) Avg Non-Gas kWh/Part. Saved = 22a) Avg Additional Non-Gas kWh/ Part. Used =	0 kWh 13 kWh	0 kWh 0 kWh	0 kWh 0 kWh
8) Non-Gas Fuel Loss Factor	8.22%			23) Number of Participants =	428,333	-	-
9) Gas Environmental Damage Factor (\$/Dth) = Escalation Rate =	✓ \$3.83 see Input 9			24) Total Annual Dth Saved =	2,092,732	0	0
10) Non Gas Fuel Enviro. Damage Factor (\$/kWh) = Escalation Rate =	✓ \$0.02536 see input 10			25) Incentive/Participant =	\$79.08	✓ #DIV/0!	✓ #DIV/0!
11) Participant Discount Rate =	5.39%			26) Environmental Compliance (% or \$/Dth)	1.40%		
12) CIP Utility Discount Rate =	✗ 5.39%			27) Market Price Effects (% or \$/Dth)	0.00		
13) Societal Discount Rate =	✓ 3.30%			28) Other Environmental	0.00		
14) General Input Data Year =	2023			29) Economic and Jobs (Macroeconomic)	0.00		
15a) Project Analysis Year 1 =	2024			30) Energy Security	0.00		
15b) Project Analysis Year 2 =	2025			31) Energy Equity	0.00		
15c) Project Analysis Year 3 =	2026			32) Utility Performance Incentives	✗ \$7,432,045.81	\$0.00	\$0.00
				33) Credit and Collection Costs	0.00		
				34) Risk	0.00		
				35) Reliability	0.00		
				36) Resilience	0.00		
Cost Summary					Triennial NPV	Triennial B/C	
Utility Cost per Participant = Cost per Participant per Dth =	\$124.27 \$60.87	✓ #DIV/0! ✓ #DIV/0!	✓ #DIV/0! ✓ #DIV/0!	Ratepayer Impact Measure Test	(\$101,609,371)	0.59	
Lifetime Energy Reduction (Dth)	25,112,778			Utility Cost Test	\$83,260,899	2.37	
Societal Cost per Dth	\$4.21			Societal Test	\$145,525,629	2.38	
				Participant Test	\$145,506,068	2.80	
				Minnesota Test	\$185,801,145	3.84	

**Attachment C-1: ECO Tracker and Balance Projection for 2025 with New
CCRA Starting in October 2025**

CenterPoint Energy Minnesota Gas

ECO Tracker and Balance

2025 Actuals + Forecast with New CCRA starting Dec 2024

2025 Forecast using 2023 rate case volumes (Docket No. G-008/GR-23-173)

CCRC interim rate approved in the 2023 rate case (Docket No. G-008/GR-23-173)

CCRA determined by 2026 year-end goal-seek to zero

	Jan 25 Actual	Feb 25 Actual	Mar 25 Actual	Apr 25 Forecast	May 25 Forecast	June 25 Forecast	July 25 Forecast	Aug 25 Forecast	Sept 25 Forecast	Oct 25 Forecast	Nov 25 Forecast	Dec 25 Forecast	Annual Summary
Expenses													
1 Beginning Tracker Balance (\$) - Under / (Over) Recovered	23,652,462	9,093,590	(1,587,826)	(3,487,923)	(6,494,578)	(7,882,717)	(6,315,882)	(3,493,723)	(2,218,076)	(3,869)	9,669,206	8,710,854	23,652,462
2 ECO Program Expenditures	(1,108,337)	2,551,016	9,051,155	5,007,845	3,690,512	4,325,659	5,018,977	3,514,184	4,453,437	5,050,517	5,382,261	13,931,963	60,869,188
3 Performance Incentive	-	-	-	-	-	-	-	-	-	7,942,034	-	-	7,942,034
4 Total Expenses & Incentive (Line 1 + Line 2 + Line 3)	22,544,124	11,644,606	7,463,329	1,519,922	(2,804,067)	(3,557,058)	(1,296,905)	20,460	2,235,361	12,988,681	15,051,467	22,642,817	92,463,683
Recovery													
5 Total Volumes (Dt)	30,587,754	28,788,495	23,814,088	18,016,318	12,150,579	8,161,810	7,688,496	7,852,234	7,320,004	9,504,239	13,983,031	22,145,089	190,012,137
6 Exemptions (Dt)	4,017,299	2,899,259	2,388,987	2,338,519	2,217,587	2,767,001	3,392,008	3,473,549	2,938,958	3,227,532	1,997,866	2,336,438	33,995,004
7 Volumes less Exemptions (Dt) (Line 5 - Line 6)	26,570,455	25,889,237	21,425,101	15,677,800	9,932,992	5,394,808	4,296,488	4,378,685	4,381,046	6,276,707	11,985,165	19,808,650	156,017,133
8 Base Interim Rate Cost Recovery (CCRC) (per Dt)	0.3407	0.3407	0.3407	0.3407	0.3407	0.3407	0.3407	0.3407	0.3407	0.3407	0.3407	0.3407	
9 Adjustment for interim CCRC rate implementation	127,600	-	-	-	-	-	-	-	-	-	-	-	127,600
10 CCRC Recovery (\$) (Line 7 x Line 8 + Line 9)	(8,924,954)	(8,820,463)	(7,299,532)	(5,341,426)	(3,384,171)	(1,838,011)	(1,463,813)	(1,491,818)	(1,492,622)	(2,138,474)	(4,083,346)	(6,748,807)	(53,027,437)
11 Base CCRA (per Dt)	0.1704	0.1704	0.1704	0.1704	0.1704	0.1704	0.1704	0.1704	0.1704	0.1885	0.1885	0.1885	
13 CCRA Recovery (\$) (Line 7 x Line 11)	(4,527,605)	(4,411,526)	(3,650,837)	(2,671,497)	(1,692,582)	(919,275)	(732,121)	(746,128)	(746,530)	(1,183,159)	(2,259,204)	(3,733,931)	(27,274,396)
14 Total Recovery (Line 10 + Line 12)	(13,452,560)	(13,231,989)	(10,950,369)	(8,012,923)	(5,076,752)	(2,757,286)	(2,195,935)	(2,237,946)	(2,239,153)	(3,321,633)	(6,342,549)	(10,482,738)	(80,301,833)
Carrying Charges													
15 Sub-Balance (\$) (Line 4 + Line 13)	9,091,565	(1,587,383)	(3,487,040)	(6,493,001)	(7,880,819)	(6,314,345)	(3,492,839)	(2,217,486)	(3,791)	9,667,048	8,708,918	12,160,079	12,161,850
16 Deferred Income Tax ([Line 14 - Line 1] x 28.742%)	4,185,093	3,069,925	545,872	863,720	398,433	(450,782)	(811,399)	(366,816)	(636,430)	(2,779,615)	276,006	(991,376)	
17 ADIT (Line 15 + Line 16 prior month)	(2,848,994)	220,931	766,803	1,630,523	2,028,956	1,578,175	766,776	399,960	(236,470)	(3,016,085)	(2,740,079)	(3,731,455)	
18 Net Investment (Line 14 + Line 16)	6,242,571	(1,366,452)	(2,720,237)	(4,862,478)	(5,851,863)	(4,736,170)	(2,726,063)	(1,817,526)	(240,261)	6,650,963	5,968,839	8,428,624	
19 Carrying Charge Rate	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	
20 Carrying Charge (Line 17 x Line 18)	2,025	(443)	(883)	(1,577)	(1,898)	(1,537)	(884)	(590)	(78)	2,158	1,936	2,734	963
20 Ending Tracker Balance - Under / (Over) Recovered (Line 14 + Line 19)	9,093,590	(1,587,826)	(3,487,923)	(6,494,578)	(7,882,717)	(6,315,882)	(3,493,723)	(2,218,076)	(3,869)	9,669,206	8,710,854	12,162,813	12,162,813

**Attachment C-2: ECO Tracker and Balance Projection for 2026 with New
CCRA Starting in October 2025**

CenterPoint Energy Minnesota Gas

ECO Tracker and Balance

2026 Forecast with New CCRA starting Oct 2025

2026 Forecast using 2023 rate case volumes (Docket No. G-008/GR-23-173)

CCRC interim rate approved in the 2023 rate case (Docket No. G-008/GR-23-173)

CCRA determined by 2026 year-end goal-seek to zero

	Jan 26 Forecast	Feb 26 Forecast	Mar 26 Forecast	Apr 26 Forecast	May 26 Forecast	June 26 Forecast	July 26 Forecast	Aug 26 Forecast	Sept 26 Forecast	Oct 26 Forecast	Nov 26 Forecast	Dec 26 Forecast	Annual Summary
Expenses													
1 Beginning Tracker Balance (\$) - Under / (Over) Recovered	12,162,813	(2,815,162)	(12,366,333)	(18,254,196)	(21,073,110)	(22,294,407)	(20,418,288)	(17,201,130)	(15,674,609)	(13,120,426)	(4,313,693)	(4,764,778)	12,162,813
2 ECO Program Expenditures	(1,033,978)	4,059,087	6,205,878	5,482,725	4,040,472	4,735,848	5,494,913	3,847,424	4,875,744	5,529,443	5,892,646	15,253,092	64,383,293
3 Performance Incentive	-	-	-	-	-	-	-	-	-	6,600,000	-	-	6,600,000
4 Total Expenses & Incentive (Line 1 + Line 2 + Line 3)	11,128,836	1,243,925	(6,160,456)	(12,771,471)	(17,032,637)	(17,558,559)	(14,923,375)	(13,353,707)	(10,798,865)	(990,983)	1,578,953	10,488,313	83,146,106
Recovery													
5 Total Volumes (Dt)	29,685,885	28,385,943	25,145,090	18,016,318	12,150,579	8,161,810	7,688,496	7,852,234	7,320,004	9,504,239	13,983,031	22,145,089	190,038,717
6 Exemptions (Dt)	3,338,056	2,672,936	2,300,334	2,338,519	2,217,587	2,767,001	3,392,008	3,473,549	2,938,958	3,227,532	1,997,866	2,336,438	33,000,785
7 Volumes less Exemptions (Dt) (Line 5 - Line 6)	26,347,829	25,713,007	22,844,755	15,677,800	9,932,992	5,394,808	4,296,488	4,378,685	4,381,046	6,276,707	11,985,165	19,808,650	157,037,932
8 Base Interim Rate Cost Recovery (CCRC) (per Dt)	0.3407	0.3407	0.3407	0.3407	0.3407	0.3407	0.3407	0.3407	0.3407	0.3407	0.3407	0.3407	
9 CCRC Recovery (\$) (Line 7 x Line 8)	(8,976,705)	(8,760,421)	(7,783,208)	(5,341,426)	(3,384,171)	(1,838,011)	(1,463,813)	(1,491,818)	(1,492,622)	(2,138,474)	(4,083,346)	(6,748,807)	(53,502,822)
10 Base CCRA (per Dt)	0.1885	0.1885	0.1885	0.1885	0.1885	0.1885	0.1885	0.1885	0.1885	0.1885	0.1885	0.1885	
11 CCRA Recovery (\$) (Line 7 x Line 10)	(4,966,566)	(4,846,902)	(4,306,236)	(2,955,265)	(1,872,369)	(1,016,921)	(809,888)	(825,382)	(825,827)	(1,183,159)	(2,259,204)	(3,733,931)	(29,601,650)
12 Total Recovery (Line 9 + Line 11)	(13,943,271)	(13,607,323)	(12,089,444)	(8,296,691)	(5,256,540)	(2,854,932)	(2,273,701)	(2,317,200)	(2,318,449)	(3,321,633)	(6,342,550)	(10,482,738)	(83,104,472)
Carrying Charges													
13 Sub-Balance (\$) (Line 4 + Line 12)	(2,814,435)	(12,363,398)	(18,249,900)	(21,068,162)	(22,289,177)	(20,413,491)	(17,197,076)	(15,670,907)	(13,117,314)	(4,312,616)	(4,763,597)	5,575	41,634
14 Deferred Income Tax ([Line 13 - Line 1] x 28.742%)	4,304,761	2,744,354	1,691,055	808,790	349,522	(540,613)	(925,841)	(439,817)	(735,018)	(2,531,541)	129,311	(1,371,095)	
15 ADIT (Line 14 + Line 15 prior month)	573,306	3,317,659	5,008,714	5,817,504	6,167,026	5,626,413	4,700,573	4,260,756	3,525,738	994,198	1,123,509	(247,586)	
16 Net Investment (Line 13 + Line 15)	(2,241,130)	(9,045,739)	(13,241,185)	(15,250,658)	(16,122,151)	(14,787,078)	(12,496,504)	(11,410,151)	(9,591,576)	(3,318,419)	(3,640,088)	(242,011)	
17 Carrying Charge Rate	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	
18 Carrying Charge (Line 16 x Line 17)	(727)	(2,935)	(4,296)	(4,948)	(5,230)	(4,797)	(4,054)	(3,702)	(3,112)	(1,077)	(1,181)	(79)	(36,138)
19 Ending Tracker Balance - Under / (Over) Recovered (Line 13 + Line 18)	(2,815,162)	(12,366,333)	(18,254,196)	(21,073,110)	(22,294,407)	(20,418,288)	(17,201,130)	(15,674,609)	(13,120,426)	(4,313,693)	(4,764,778)	5,496	5,496

Attachment D: Detailed Energy Savings Information for Projects with Deemed Savings Measures

This attachment provides additional information about certain measures rebated in 2024. Where the savings Dth/unit for a measure is listed as N/A, the Company does not claim a deemed savings amount for that measure. For example, for residential insulation measures, such as air sealing, the Company claims energy savings on the basis of the change in R-value observed at the participating home. Similarly, the Company claims “deemed calculated” energy savings for many commercial measures; This means that the Company uses a formula to calculate energy savings on the basis of certain customer-provided inputs. For example, the energy savings claimed for a process boiler depends on the boiler’s efficiency and British thermal unit (“Btu”) per hour input as provided by the customer.

Project and Measure Name	Quantity	Measure Life	Participant Cost	Savings Dth/Unit	Total Dth Savings
Residential Market Segment					
Home Efficiency Rebates					
92% AFUE furnace	904	20	\$703	11.97	10,822
96% AFUE furnace	8,043	20	\$950	14.00	112,587
97% AFUE furnace	6,098	20	\$1,048	14.67	89,479
85% efficient boiler	5	20	\$1,446	1.65	8
91% efficient boiler	254	20	\$2,379	15.30	3,886
Programmable thermostat	1,856	10	\$30	3.15	5,846
Wi-Fi or smart thermostat	5,392	10	\$174	3.83	20,624
Hearth with electronic ignition	864	15	\$193	4.38	3,787
.64/.68 UEF tank water heater (<55 gallons)	1,912	15	\$204	2.07	3,959
.68 UEF tank water heater (>55 Gallons, <75,000 Btu/hr)	0	15	\$814	0.23	0
88% thermal efficiency water heater (>75,000 Btu/hr, commercial water heater in residential application)	0	11	\$1,350	1.86	0
Indirect water heater	27	15	\$989	4.47	121
.87 UEF tankless water heater	542	20	\$605	5.71	3,097
Combination unit (.87 UEF tankless water heater + air handling unit, boilers rated as combination boilers in AHRI, forced air systems rated as combination system)	255	20	\$1,555	19.71	5,026
ENERGY STAR clothes dryer	253	14	\$152	0.11	27
DIY Home Efficiency					
Low-flow (1.5 GPM) showerhead	299	10	N/A	1.46	437
Low-flow (1.5 GPM) kitchen aerator	299	10	N/A	0.35	104

Low-flow (0.5) bathroom aerator	598	10	N/A	0.30	181
Thermostatic restrictor shower valve	0	10	N/A	0.29	0
6' feet of R-2 (at least) DHW pipe insulation	299	13	N/A	1.22	365
Rope caulk	299	1	N/A	0.10	28
EDPM weatherstripping	0	1	N/A	0.10	0
Outlet and switch gaskets	0	1	N/A	0.10	0
Window film	299	1	N/A	0.10	28
Water heater temperature card	299	2	N/A	0.26	76
Wool dryer balls	299	1	N/A	0.31	92
Home Energy Squad					
Low-flow (1.5 GPM) showerhead	2,483	10	N/A	1.76	4,375
Low-flow (1.5 GPM) kitchen faucet aerator	391	10	N/A	0.56	219
Low-flow (1.0 GPM) bathroom faucet aerator	0	10	N/A	0.32	0
Low-flow (0.5 GPM) bathroom faucet aerator	1,682	10	N/A	0.49	823
Weatherstripping on doors	3,306	2	N/A	0.70	2,313
Weatherstripping on attic hatches	295	20	N/A	1.40	413
Programmable thermostat	570	10	N/A	3.15	1,796
WiFi or smart thermostat	651	10	N/A	3.83	2,490
Water heater setback	1,430	2	N/A	1.02	1,459
6' feet of R-2 (at least) DHW pipe insulation	2,599	13	N/A	1.47	3,824
New Home Construction Rebates					
92% AFUE furnace	167	20	\$132	1.37	228
96% AFUE furnace	116	20	\$379	2.95	343
97% AFUE furnace	9	20	\$477	3.71	33
91% efficient boiler	11	20	\$2,379	15.30	168
WiFi or smart thermostat	387	10	\$159	0.67	261
Hearth with electronic ignition	2,158	15	\$193	4.38	9,459
.64/.68 UEF power vent tank water heater (<55 gallons)	29	15	\$204	2.07	60
.68 UEF tank water heater (>55 Gallons, <75,000 Btu/hr)	0	15	\$814	0.23	0
88% thermal efficiency water heater (>75,000 Btu/hr, commercial water heater in residential application)	0	11	\$1,350	1.86	0
Indirect water heater	5	15	\$989	4.47	22

.87 UEF tankless water heater	20	20	\$605	5.71	114
Combination unit (.87 UEF tankless water heater + air handling unit, boilers rated as combination boilers in AHRI, forced air systems rated as combination system)	7	20	\$984	8.67	61
ENERGY STAR clothes dryer	23	14	\$152	0.11	2
Energy Efficiency Kits					
Low-flow (1.5 GPM) showerhead (Schools)	15,000	10	N/A	0.49	7,383
Low-flow (1.5 GPM) kitchen faucet aerator (Schools)	15,000	10	N/A	0.13	1,916
Low-flow (0.5 GPM) bathroom faucet aerator (Schools)	15,000	10	N/A	0.12	1,840
Water heater setback (Schools)	15,000	2	N/A	0.22	3,314
Wool dryer balls (Schools)	15,000	1	N/A	0.18	2,641
Low-flow (1.5 GPM) showerhead (Community)	1,203	10	N/A	0.49	592
Low-flow (1.5 GPM) kitchen faucet aerator (Community)	1,203	10	N/A	0.13	154
Low-flow (0.5 GPM) bathroom faucet aerator (Community)	1,203	10	N/A	0.12	148
Water heater setback (Community)	1,203	2	N/A	0.22	266
Wool dryer balls (Community)	1,203	1	N/A	0.18	212
Low-Flow (1.5 GPM) Showerhead (Renter Kit)	669	10	N/A	1.46	978
Low-flow (1.5 GPM) kitchen faucet aerator (Renter Kit)	669	10	N/A	0.35	232
Low-flow (0.5 GPM) bathroom faucet aerator (Renter Kit)	669	10	N/A	0.30	203
Window film (Renter Kit)	669	1	N/A	0.10	64
Wool dryer balls (Renter Kit)	669	1	N/A	0.31	207
Rope caulk (Renter Kit)	669	1	N/A	0.10	64
2 Outlet gaskets (Renter Kit)	669	1	N/A	0.19	127
Water heater setback (Renter Kit)	669	2	N/A	0.13	85
Low Income Market Segment					
Low Income Weatherization					
Weatherization	417	20	N/A	30.42	12,686
92% AFUE furnace	0	20	N/A	11.97	0
96% AFUE furnace	217	20	N/A	14.00	3,038
97% AFUE furnace	19	20	N/A	14.67	279
85% efficient boiler	0	20	N/A	1.65	0

91% efficient boiler	24	20	N/A	15.30	367
Programmable thermostat	85	10	N/A	3.15	268
Combination unit (.87 UEF tankless water heater + air handling unit, boilers rated as combination boilers in AHRI, forced air systems rated as combination system)	1	20	N/A	19.71	20
.64/.68 UEF tank water heater (<55 gallons)	253	15	N/A	2.07	524
Indirect water heater	0	15	N/A	4.47	0
.87 UEF tankless water heater	3	20	N/A	4.80	14
Furnace tune-up	56	2	N/A	1.52	85
Boiler tune-up	5	2	N/A	2.32	12
Pipe Wrap	208	13	N/A	1.47	306
Water Heater Blankets	1	13	N/A	0.39	0
Low-Flow (1.5 GPM) Showerhead (Renter Kit)	83	10	N/A	1.46	121
Low-flow (1.5 GPM) kitchen faucet aerator (Renter Kit)	83	10	N/A	0.35	29
Low-flow (0.5 GPM) bathroom faucet aerator (Renter Kit)	83	10	N/A	0.30	25
Window film (Renter Kit)	83	1	N/A	0.10	8
Wool dryer balls (Renter Kit)	83	1	N/A	0.31	26
Rope caulk (Renter Kit)	83	1	N/A	0.10	8
2 Outlet gaskets (Renter Kit)	83	1	N/A	0.19	16
Water heater temperature card (Renter Kit)	83	2	N/A	0.26	21
Pre-weatherization	139	N/A	N/A	N/A	N/A
Low-Income Rental Efficiency					
Weatherization	11	20	N/A	24.20	266
92% AFUE Furnace	0	20	N/A	11.97	0
96% AFUE Furnace	50	20	N/A	14.00	700
97% AFUE Furnace	0	20	N/A	14.67	0
85% efficient boiler	1	20	N/A	1.65	2
91% efficient boiler	10	20	N/A	15.30	153
Furnace Tune-up/Repair	2	2	N/A	1.52	3
Boiler Tune-up/Repair	1	2	N/A	2.32	2

Programmable thermostat	58	10	N/A	3.15	183
Combination unit (.87 UEF tankless water heater + air handling unit, boilers rated as combination boilers in AHRI, forced air systems rated as combination system)	12	20	N/A	19.71	237
.64/.68 UEF tank water heater (<55 gallons)	53	15	N/A	2.07	110
Indirect water heater	0	15	N/A	4.47	0
Low-Flow (1.5 GPM) Showerhead (Renter Kit)	254	10	N/A	1.46	371
Low-flow (1.5 GPM) kitchen faucet aerator (Renter Kit)	254	10	N/A	0.35	88
Low-flow (0.5 GPM) bathroom faucet aerator (Renter Kit)	254	10	N/A	0.30	77
Window film (Renter Kit)	254	1	N/A	0.10	24
Wool dryer balls (Renter Kit)	254	1	N/A	0.31	78
Rope caulk (Renter Kit)	254	1	N/A	0.10	24
2 Outlet gaskets (Renter Kit)	254	1	N/A	0.19	48
Water heater temperature card (Renter Kit)	254	2	N/A	0.13	32
Pre-weatherization	22	N/A	N/A	N/A	N/A
Homeowner Efficiency Redo Opportunity					
Weatherization	0	20	N/A	N/A	0
92% AFUE furnace	0	20	N/A	11.97	0
96% AFUE furnace	0	20	N/A	14.00	0
97% AFUE furnace	0	20	N/A	14.67	0
85% efficient boiler	0	20	N/A	1.65	0
91% efficient boiler	0	20	N/A	15.30	0
Programmable thermostat	0	10	N/A	3.15	0
Combination unit (.87 UEF tankless water heater + air handling unit, boilers rated as combination boilers in AHRI, forced air systems rated as combination system)	0	20	N/A	19.71	0
.64/.68 UEF tank water heater (<55 gallons)	0	15	N/A	2.07	0
Indirect water heater	0	15	N/A	4.47	0
.87 UEF tankless water heater	0	20	N/A	4.80	0

Furnace tune-up	0	2	N/A	1.52	0
Boiler tune-up	0	2	N/A	2.32	0
Pipe Wrap	0	13	N/A	1.47	0
Water Heater Blankets	0	13	N/A	0.39	0
Low-Flow (1.5 GPM) Showerhead (Renter Kit)	0	10	N/A	1.46	0
Low-flow (1.5 GPM) kitchen faucet aerator (Renter Kit)	0	10	N/A	0.35	0
Low-flow (0.5 GPM) bathroom faucet aerator (Renter Kit)	0	10	N/A	0.30	0
Window film (Renter Kit)	0	1	N/A	0.10	0
Wool dryer balls (Renter Kit)	0	1	N/A	0.31	0
Rope caulk (Renter Kit)	0	1	N/A	0.10	0
2 Outlet gaskets (Renter Kit)	0	1	N/A	0.19	0
Water heater temperature card (Renter Kit)	0	2	N/A	0.26	0
Pre-weatherization	0	N/A	N/A	N/A	N/A
Non-Profit Affordable Housing					
92% AFUE furnace (retrofit)	5	20	\$703	11.97	60
96% AFUE furnace (retrofit)	7	20	\$950	14.00	98
97% AFUE furnace (retrofit)	2	20	\$1,048	14.67	29
85% efficient boiler (retrofit)	0	20	\$1,446	1.65	0
91% efficient boiler (retrofit)	0	20	\$2,379	15.30	0
Programmable thermostat (retrofit)	4	10	\$30	3.15	13
WiFi or smart thermostat (retrofit)	4	10	\$174	3.83	15
.64/.68 UEF tank water heater (<55 gallons, retrofit)	13	15	\$400	2.07	27
Indirect water heater (retrofit)	0	15	\$989	4.47	0
.87 UEF tankless water heater (retrofit) (replacing tank water heater)	0	20	\$605	4.80	0
Heat recovery ventilator ("HRV")/ energy recovery ventilator ("ERV") (retrofit)	1	15	\$980	9.11	9
Air sealing (retrofit)	11	20	\$1,720	4.48	49
Attic insulation (retrofit)	11	20	\$1,411	2.66	29
Wall insulation (retrofit)	3	20	\$3,685	48.38	145

Sill plate/rim joist (retrofit)	5	20	\$854	1.89	9
Low-flow (1.5 GPM) showerhead (retrofit)	0	10	\$12	1.76	0
Low-flow (1.5 GPM) kitchen faucet aerator (retrofit)	0	10	\$7	0.56	0
Low-flow (1.0 GPM) bathroom faucet aerator (retrofit)	0	10	\$7	0.32	0
ENERGY STAR® clothes washer (retrofit)	2	11	\$163	0.17	0.3
ENERGY STAR® gas clothes dryer (retrofit)	0	14	\$152	0.11	0
92% AFUE furnace (new construction)	2	20	\$132	1.37	3
96% AFUE furnace (new construction)	3	20	\$379	2.95	9
97% AFUE furnace (new construction)	0	20	\$477	3.71	0
91% efficient boiler (new construction)	3	20	\$2,379	15.30	46
WiFi or smart thermostat (new construction)	9	10	\$159	0.67	6
.64/.68 UEF tank water heater (<55 gallons, new construction)	3	15	\$400	2.07	6
Indirect water heater (new construction)	0	15	\$989	4.47	0
.87 UEF tankless (new construction)	1	20	\$605	5.71	6
HRV/ERV (new construction)	38	15	\$980	9.11	346
Above code air sealing (new construction)	4	20	\$3,140	2.71	11
Above code attic insulation (new construction)	4	20	\$526	0.43	2
Above code wall insulation (new construction)	4	20	\$415	2.44	10
Low-flow (1.5 GPM) showerhead (new construction)	8	10	\$12	1.76	14
Low-flow (1.5 GPM) kitchen faucet aerator (new construction)	8	10	\$7	0.56	4
Low-flow (1.0 GPM) bathroom faucet aerator (new construction)	8	10	\$7	0.32	3
ENERGY STAR® clothes washer (new construction)	9	11	\$163	0.17	2
ENERGY STAR® gas clothes dryer (new construction)	8	14	\$152	0.11	1
Pre-Weatherization	0	N/A	N/A	N/A	N/A

Low-Income Multi-Family Building Efficiency					
Low-Flow (1.5 GPM) Showerhead (DI Measure)	653	10	N/A	2.07	1,349
Low-Flow (1.5 GPM) Kitchen Faucet Aerator (DI Measure)	890	10	N/A	0.56	495
Low-Flow (0.5 GPM) Bathroom Faucet Aerator (DI Measure)	889	10	N/A	0.47	414
Hot Water Temp Adjustment (DI Measure)	3	2	N/A	38.11	114
Door Weatherization (DI Measure)	0	11	N/A	5.45	0
Green Garage Door Hinge (DI Measure)	1	20	N/A	12.80	13
Programmable Thermostat (DI Measure)	0	8	N/A	9.81	0
Low-Flow (1.5 GPM) Showerhead (Renter Kit)	0	10	N/A	2.07	0
Low-Flow (1.5 GPM) Kitchen Faucet Aerator (Renter Kit)	0	10	N/A	0.56	0
Low-Flow (1.0 GPM) Bathroom Faucet Aerator (Renter Kit)	0	10	N/A	0.30	0
Window Film (Renter Kit)	0	1	N/A	0.10	0
Commercial steam boiler	0	20	\$0	N/A	0
Turbulators for commercial boiler (hot water or steam)	0	20	\$0	N/A	0
Modulating burner replacement for commercial boiler (hot water or steam)	2	15	\$38,204	38.05	76
Stack damper for commercial boiler (hot water or steam)	6	5	\$10,020	17.47	105
Steam traps	0	6	\$0	N/A	0
Commercial water heater non-GAMA rated (88%+ thermal efficiency)	21	11	\$28,350	21.44	450
C&I high-efficiency hot water boiler (85% - 87.9% efficient); 100,000 - 12.5 million btu	1	20	\$6,674	132.13	132
C&I condensing efficiency hot water boiler (88%+ efficient); 100,000 - 12.5 million btu	15	20	\$174,150	139.95	2,099
Boiler tune-up	47	2	\$23,265	16.72	786
Boiler reset control	9	5	\$13,176	23.55	212
Boiler cutout control	7	5	\$6,370	10.70	75
Linkageless controls	0	15	\$0	N/A	0
CO garage sensors	0	15	\$0	N/A	0
Condensing unit heater	0	12	\$0	N/A	0

Infrared heaters	0	15	\$0	N/A	0
92% AFUE furnace	0	20	\$0	N/A	0
96% AFUE furnace	187	20	\$267,223	8.50	1,590
97% AFUE furnace	163	20	\$247,271	8.43	1,373
Commercial DCV - Retrofit	0	15	\$0	N/A	0
Process boiler	0	20	\$0	N/A	0
Stack economizer - process, conventional	0	15	\$0	N/A	0
Stack economizer - process, condensing	0	15	\$0	N/A	0
High-efficiency single package vertical unit	0	20	\$0	N/A	0
.64/.68 UEF tank water heater (<55 gallons, <75,000 Btu)	48	11	\$27,696	9.53	458
Industrial boiler/burner tune-up	0	2	\$0	N/A	0
Commercial pipe insulation - hydronic heat	0	15	\$0	N/A	0
Commercial pipe insulation - low pressure steam heat	0	15	\$0	N/A	0
Commercial pipe insulation - high pressure steam heat	0	15	\$0	N/A	0
Commercial pipe insulation - domestic hot water	0	15	\$0	N/A	0
Air curtains	0	15	\$0	N/A	0
Ozone/low temperature laundry	0	10	\$0	N/A	0
Green garage door hinge	0	20	\$0	N/A	0
Modulating clothes dryer	0	14	\$0	N/A	0
Hearth with electronic ignition	0	15	\$0	N/A	0
Smart thermostats	74	10	\$12,876	5.78	428
AC Covers	169	10	\$10,140	0.37	63
Combi oven (CEW or ENERGY STAR®)	0	12	\$0	N/A	0
Charbroilers - infrared	0	12	\$0	N/A	0
C&I Market Segment					
Commercial Foodservice					
Broilers - infrared, upright	0	12	\$4,413	N/A*	0
Charbroilers - infrared	1	12	\$2,173	N/A*	71
Combi oven	8	12	\$2,250	338.73	2,710
Combi oven (CEW or ENERGY STAR®)	93	12	\$7,741	359.40	33,424
Convection oven	95	12	\$1,325	22.93	2,178
Conveyor broiler	2	12	\$3,146	122.32	245
Conveyor oven	11	12	\$2,230	42.23	465
Cooktop, efficient gas burner	0	12	\$127	N/A	0

Demand control ventilation - kitchen hood	43	15	\$7,679	82.50	3,547
Dishwasher - ENERGY STAR®, pot, pan, utensil, high temp	0	10	\$1,710	N/A	0
Dishwasher - ENERGY STAR®, single, door, high temp	13	15	\$770	29.42	382
Dishwasher - ENERGY STAR®, single, conveyor, high temp	5	20	\$2,050	17.86	89
Dishwasher - ENERGY STAR®, multi, conveyor, high temp	1	20	\$970	67.78	68
Fryer - 50%	7	11	\$1,488	37.49	262
Fryer - 51-59%	68	11	\$1,488	37.49	2,549
Fryer - ≥60%	16	11	\$2,986	56.91	911
Griddle	10	12	\$1,346	37.93	379
Pasta cooker	10	12	\$2,413	114.01	1,140
Range base, efficient	0	8	\$2,050	N/A	0
Rotating rack oven - Single	4	12	\$4,933	36.18	145
Rotating rack oven - Double	6	12	\$5,187	58.47	351
Rotisserie oven	0	12	\$2,665	N/A*	0
Salamander broiler	3	12	\$1,006	32.45	97
Steamer equipment	4	12	\$2,059	110.44	442
C&I Heating and Water Heating					
Commercial steam boiler	1	20	\$4,665	82.72	83
Turbulators for commercial boiler (hot water or steam)	0	20	\$1,375	N/A	0
Modulating burner replacement for commercial boiler (hot water or steam)	22	15	\$19,102	282.99	6,226
Stack damper for commercial boiler (hot water or steam)	0	5	\$59,219	N/A	0
Steam traps	2,596	6	\$134	135.30	351,226
Commercial water heater non-GAMA rated (88%+ thermal efficiency)	89	11	\$1,350	28.06	2,497
C&I high-efficiency hot water boiler (85% - 87.9% efficient); 100,000 - 12.5 million btu	2	20	\$4,989	33.39	67
C&I condensing efficiency hot water boiler (88%+ efficient); 100,000 - 12.5 million btu	116	20	\$11,610	519.33	60,243
Boiler tune-up	999	2	\$750	109.32	109,212
Boiler reset control	1	5	\$600	149.44	149
Boiler cutout control	0	5	\$141	N/A	0

Linkageless controls	23	15	\$22,540	445.80	10,253
CO garage sensors	0	15	\$672	N/A	0
Condensing unit heater	1	12	\$676	29.37	29
Energy recovery wheels	20	15	\$6,816	122.06	2,441
Infrared heaters	45	15	\$1,716	26.30	1,184
92% AFUE furnace	28	20	\$981	17.36	486
96% AFUE furnace	35	20	\$1,327	20.20	707
97% AFUE furnace	192	20	\$2,357	20.96	4,024
Commercial DCV - Retrofit	1	15	\$1,302	192.99	193
Process boiler	2	20	\$14,528	828.39	1,657
Stack economizer - process, conventional	0	15	\$45,300	N/A	0
Stack economizer - process, condensing	4	15	\$101,806	2542.57	10,170
.64/.68 UEF tank water heater (<55 gallons, <75,000 Btu)	7	11	\$577	13.26	93
High volume low static fan	13	10	\$6,725	536.25	6,971
Industrial boiler/burner tune-up	92	2	\$1,698	910.05	83,724
Industrial cutout control	0	5	\$141	N/A	0
Industrial modulating burner	0	15	\$13,662	N/A	0
Industrial stack damper	0	5	\$16,875	N/A	0
Industrial reset control	0	5	\$600	N/A	0
Industrial turbulator	0	20	\$1,375	N/A	0
Commercial pipe insulation - hydronic heat	33	15	\$9,963	137.95	4,552
Commercial pipe insulation - low pressure steam heat	10	15	\$9,587	34.63	346
Commercial pipe insulation - high pressure steam heat	18	15	\$6,857	28.52	513
Commercial pipe insulation - domestic hot water	3	15	\$2,922	133.67	401
Air curtains	4	15	\$13,240	625.41	2,502
Ozone/low temperature laundry	0	10	\$38,701	N/A	0
Green garage door hinge	0	20	\$340	N/A	0
Modulating clothes dryer	1	14	\$525	112.69	113
Hearth with electronic ignition	5	15	\$193	4.38	22
Smart thermostats	106	10	\$174	6.03	639
C&I Audit Services					
Low-flow 1.0 GPM bathroom faucet aerator	0	10	N/A	1.15	0
Low-flow (0.5 GPM) bathroom faucet aerator	58	10	N/A	1.78	103
Low-flow (1.5 GPM) kitchen faucet aerator	87	10	N/A	0.57	50

Low-flow (1.5 GPM) showerhead	1	10	N/A	1.17	1
Commercial Programmable Thermostat	18	8	N/A	6.31	114
Scheduling of existing programmable thermostat	113	8	N/A	2.85	322
Commercial Weatherstripping	212	11	N/A	4.87	1,032
Hot water temp adjustment (multi-family only)	0	2	N/A	38.11	0
Multifamily Building Efficiency					
Low-Flow (1.5 GPM) Showerhead (DI Measure)	2,545	10	N/A	2.07	5,258
Low-Flow (1.5 GPM) Kitchen Faucet Aerator (DI Measure)	1,503	10	N/A	0.56	836
Low-Flow (0.5 GPM) Bathroom Faucet Aerator (DI Measure)	3,828	10	N/A	0.47	1,782
Hot Water Temp Adjustment (DI Measure)	1	2	N/A	38.11	38
Door Weatherization (DI Measure)	65	11	N/A	5.45	354
Green Garage Door Hinge (DI Measure)	8	20	N/A	12.80	102
Programmable Thermostat (DI Measure)	9	8	N/A	9.81	88
Low-Flow (1.5 GPM) Showerhead (Renter Kit)	0	10	N/A	2.07	0
Low-Flow (1.5 GPM) Kitchen Faucet Aerator (Renter Kit)	0	10	N/A	0.56	0
Low-Flow (1.0 GPM) Bathroom Faucet Aerator (Renter Kit)	0	10	N/A	0.30	0
Window Film (Renter Kit)	0	1	N/A	0.10	0
Commercial steam boiler	1	20	\$4,665	109.96	110
Turbulators for commercial boiler (hot water or steam)	0	20	\$0	N/A	0
Modulating burner replacement for commercial boiler (hot water or steam)	1	15	\$19,102	103.36	103
Stack damper for commercial boiler (hot water or steam)	29	5	\$48,430	29.11	844
Steam traps	103	6	\$13,802	102.55	10,563
Commercial water heater non-GAMA rated (88%+ thermal efficiency)	41	11	\$55,350	31.63	1,297
C&I high-efficiency hot water boiler (85% - 87.9% efficient); 100,000 - 12.5 million btu	8	20	\$53,392	77.18	617

C&I condensing efficiency hot water boiler (88%+ efficient); 100,000 - 12.5 million btu	43	20	\$499,230	174.77	7,515
Boiler tune-up	1,128	2	\$558,360	20.44	23,051
Boiler reset control	28	5	\$40,992	31.58	884
Boiler cutout control	29	5	\$26,390	11.24	326
Linkageless controls	0	15	\$0	N/A	0
CO garage sensors	36	15	\$24,192	97.13	3,497
Condensing unit heater	0	12	\$0	N/A	0
Infrared heaters	0	15	\$0	N/A	0
92% AFUE furnace	12	20	\$16,104	21.40	257
96% AFUE furnace	272	20	\$388,688	8.87	2,413
97% AFUE furnace	133	20	\$201,761	12.23	1,627
Commercial DCV - Retrofit	0	15	\$0	N/A	0
Process boiler	0	20	\$0	N/A	0
Stack economizer - process, conventional	0	15	\$0	N/A	0
Stack economizer - process, condensing	0	15	\$0	N/A	0
High-efficiency single package vertical unit	0	20	\$0	N/A	0
.64/.68 UEF tank water heater (<55 gallons, <75,000 Btu)	3	11	\$1,731	5.60	17
Industrial boiler/burner tune-up	0	2	\$0	N/A	0
Commercial pipe insulation - hydronic heat	2	15	\$566	12.99	26
Commercial pipe insulation - low pressure steam heat	0	15	\$0	N/A	0
Commercial pipe insulation - high pressure steam heat	0	15	\$0	N/A	0
Commercial pipe insulation - domestic hot water	0	15	\$0	N/A	0
Air curtains	0	15	\$0	N/A	0
Ozone/low temperature laundry	0	10	\$0	N/A	0
Green garage door hinge	0	20	\$0	N/A	0
Modulating clothes dryer	0	14	\$0	N/A	0
Hearth with electronic ignition	7	15	\$1,351	4.38	31
Smart thermostats	50	10	\$8,700	3.33	166
AC Covers	0	10	\$0	N/A	0
Combi oven (CEW or ENERGY STAR®)	0	12	\$0	N/A	0
Charbroilers - infrared	0	12	\$0	N/A	0
EFS Market Segment					
Home Efficiency Rebates					
7.8 HSPF2 ASHP w/ existing furnace	114	18	\$2,000	18.76	2,138

7.8 HSPF2 ASHP + 92% AFUE furnace	24	19	\$2,703	25.21	605
7.8 HSPF2 ASHP + 96% AFUE furnace	322	19	\$2,950	26.42	8,509
7.8 HSPF2 ASHP + 97% AFUE furnace	1,201	19	\$3,048	26.83	32,221
New Home Construction Rebates					
7.8 HSPF2 ASHP + 92% furnace (new construction)	0	19	\$2,132	15.28	0
7.8 HSPF2 ASHP + 96% furnace (new construction)	0	19	\$2,379	16.23	0
7.8 HSPF2 ASHP + 97% furnace (new construction)	0	19	\$2,477	16.68	0
Low Income Weatherization					
7.8 HSPF2 ASHP w/ existing furnace	0	18	N/A	18.76	0
7.8 HSPF2 ASHP + 92% AFUE furnace	0	19	N/A	25.21	0
7.8 HSPF2 ASHP + 96% AFUE furnace	0	19	N/A	26.42	0
7.8 HSPF2 ASHP + 97% AFUE furnace	0	19	N/A	26.83	0
Low-Income Rental Efficiency					
7.8 HSPF2 ASHP w/ existing furnace	0	18	N/A	18.76	0
7.8 HSPF2 ASHP + 92% AFUE furnace	0	19	N/A	25.21	0
7.8 HSPF2 ASHP + 96% AFUE furnace	0	19	N/A	26.42	0
7.8 HSPF2 ASHP + 97% AFUE furnace	0	19	N/A	26.83	0
Homeowner Efficiency Redo Opportunity					
7.8 HSPF2 ASHP w/ existing furnace	0	18	N/A	18.76	0
7.8 HSPF2 ASHP + 92% AFUE furnace	0	19	N/A	25.21	0
7.8 HSPF2 ASHP + 96% AFUE furnace	0	19	N/A	26.42	0
7.8 HSPF2 ASHP + 97% AFUE furnace	0	19	N/A	26.83	0
Non-Profit Affordable Housing					
7.8 HSPF2 ASHP (replacement) w/ Existing Furnace	0	18	\$2,000	18.76	0
7.8 HSPF2 ASHP + 92% furnace (replacement)	0	19	\$2,703	25.21	0

7.8 HSPF2 ASHP + 96% furnace (replacement)	0	19	\$2,950	26.42	0
7.8 HSPF2 ASHP + 97% furnace (replacement)	0	19	\$3,048	26.83	0
7.8 HSPF2 ASHP + 92% furnace (new construction)	0	19	\$2,132	15.28	0
7.8 HSPF2 ASHP + 96% furnace (new construction)	0	19	\$2,379	16.23	0
7.8 HSPF2 ASHP + 97% furnace (new construction)	0	19	\$2,477	16.68	0

Attachment E: Revised Tariff Page

CenterPoint Energy attaches a revised tariff page reflecting the Conservation Cost Recovery Adjustment (“CCRA”) it proposed in Section 4 of this filing. Tariff page revisions were made relative to the currently approved tariff page and not any other proposed, but unapproved tariff pages.

ENERGY CONSERVATION AND OPTIMIZATION~~IMPROVEMENT PROGRAM~~ ADJUSTMENT RIDER**Applicability:**

Applicable to bills for gas and/or transportation service provided under the Company's retail rate schedules.

Exemptions are as follows:

"Large Energy Facility", as defined in Minn. Stat. 216B.2421 customers shall receive a monthly exemption from Energy Conservation and Optimization ~~conservation-improvement program~~ (ECOCIP) charges pursuant to Minn. Stat. 216B.16, subd. 6b Energy Conservation Improvement. Upon exemption from conservation program charges, the "Large Energy Facility" customers can no longer participate in any utility's Energy Conservation Improvement Program.

"Large Customer Facility" customers that have been exempted from the Company's ECOCIP charges pursuant to Minn. Stat. 216B.241, subd. 1a (b) shall receive a monthly exemption from ECOCIP charges pursuant to Minn. Stat. 216B.16, subd. 6b Energy Conservation Improvement. Such monthly exemption will be effective beginning January 1 of the year following the grant of exemption. Upon exemption from the conservation program charges, the "Large Customer Facility" customers can no longer participate in CenterPoint Energy's Energy Conservation Improvement Program.

Minnesota Stat. 216B.241, subd. 1a(c) which allows exemption of certain commercial gas customers does not apply to CenterPoint Energy because the Company's customer count exceeds the 600,000 level set in statute.

Rate:

Base Charge Per Therm (CCRC)	Adjustment (CCRA)
\$0.03407	\$0.017040 <u>0.01885</u>

Interim Surcharge

Effective January 1, 2025, customers' bills will be increased on an interim basis by 33.78% on the Monthly Basic Charge and the Delivery Charge per therm. Any sales tax and Franchise Fees will be calculated on the increased bill. If the total amount of the rate increase approved at the end of the Rate Case (Docket G-008/GR-23-173) is lower than the total amount of the interim rates collected, the Company will refund the difference with interest.

Rider:

~~An Conservation Improvement Program~~Energy Conservation and Optimization Adjustment which shall be included on each non-exempt customer's monthly bill. The applicable factor shall be multiplied by the customer's monthly billing in Therms for gas service before any adjustments, surcharges or sales tax.

Determination of Conservation Cost Recovery Charge (CCRC or Base Charge per Therm):

The CCRC is the amount included in base rates dedicated to the recovery of ECOCIP costs as approved by the Minnesota Public Utilities Commission in the Company's last general rate case. The CCRC is approved and applied on a per therm basis by dividing test-year ECOCIP expenses by the test-year sales volumes (net of ECOCIP-exempt volumes). All revenue received from the CCRC shall be credited to the ECOCIP tracker account.

**ENERGY CONSERVATION AND OPTIMIZATION~~IMPROVEMENT PROGRAM~~ ADJUSTMENT RIDER
(CONTINUED)****Determination of Conservation Improvement Program Adjustment (CCRA):**

The ~~Conservation Improvement Program~~Energy Conservation and Optimization Adjustment shall be calculated for each customer class by dividing the Recoverable Conservation Improvement Expense by the Projected Sales Volumes for a designated recovery period. The factor may be adjusted annually with the approval of the Minnesota Public Utilities Commission.

Recoverable Conservation Improvement Expense shall be the incremental ~~Conservation Improvement Program~~Energy Conservation and Optimization expense not recovered through base rates as estimated for a designated period. The Program costs shall be recovered from customer classes using the current sales forecast.

Projected Sales Volumes shall be the total sales volume forecasted to be delivered to that class of customer over a budgeted 12-month period (net of ~~ECOCIP~~ exempt volumes).

For each designated twelve (12) month period, an annual reconciliation will be determined based upon annual conservation costs incurred by CenterPoint Energy compared with annual conservation costs to be recovered from volumes of gas sold. The annual cost recovered is the product of the ~~ECOCIP~~ charge per therm during the twelve (12) month period and the applicable gas sales volumes during the period. The difference between incurred costs and recovered costs will be used in calculating a Conservation Improvement Program Reconciliation (CIPR or CCRA) factor for each rate schedule. The CIPR (or CCRA) factor will be applied to customers' billings for the designated period and will be in effect for a twelve (12) month period, or until the Commission approves a new CCRA. Any under or over-recovery due to the CIPR factor will be included in the calculation of the CIPR factor for the following period in order to collect from or return to customers the under or over-recovered amount.

CERTIFICATE OF SERVICE

Martin Kapsch served the above *Compliance Filing* of CenterPoint Energy to all persons at the addresses indicated on the attached list by having the document delivered by electronic filing.

/s/_____

Martin Kapsch

Senior Regulatory Analyst, Energy Conservation and Optimization Programs
CenterPoint Energy

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP		50 S 6th St Ste 1500 Minneapolis MN, 55402-1498 United States	Electronic Service		No	10-111CI-10-111
2	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	10-111CI-10-111
3	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	10-111CI-10-111
4	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		Yes	10-111CI-10-111
5	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	10-111CI-10-111
6	Tina	Koecher	tkoecher@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	10-111CI-10-111
7	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	10-111CI-10-111
8	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	10-111CI-10-111
9	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	10-111CI-10-111
10	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	10-111CI-10-111
11	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	10-111CI-10-111
12	Grey	Staples	gstaples@mendotagroup.com	The Mendota Group LLC		1830 Fargo Lane Mendota Heights MN, 55118 United States	Electronic Service		No	10-111CI-10-111
13	Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	10-111CI-10-111

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Julie	Ambach	juliea@cmmmpa.org	Shakopee Public Utilities		255 Sarazin St Shakopee MN, 55379 United States	Electronic Service		No	23-95CIP-23-95
2	Anjali	Bains	bains@fresh-energy.org	Fresh Energy		408 Saint Peter Ste 220 Saint Paul MN, 55102 United States	Electronic Service		No	23-95CIP-23-95
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	23-95CIP-23-95
4	Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	23-95CIP-23-95
5	JEFFREY	BEIRIGER	info@mhca.info	Minnesota Heating & Cooling Association		5625 Xerxes Ave N, Suite C Box # 167 Brooklyn Center MN, 55430 United States	Electronic Service		No	23-95CIP-23-95
6	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	23-95CIP-23-95
7	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	23-95CIP-23-95
8	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	23-95CIP-23-95
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	23-95CIP-23-95
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	23-95CIP-23-95
11	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	23-95CIP-23-95
12	Patrick	Deal	pdeal@mnchamber.com	Minnesota Chamber of Commerce		400 Robert St N Ste 1500 Saint Paul MN, 55101 United States	Electronic Service		No	23-95CIP-23-95
13	Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy		7701 France Ave S Ste	Electronic Service		No	23-95CIP-23-95

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
27	Martin	Kapsch	martin.kapsch@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-95CIP-23-95
28	Deborah	Knoll	dknoll@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	23-95CIP-23-95
29	Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas		null null, null United States	Electronic Service		No	23-95CIP-23-95
30	Tina	Koecher	tkoecher@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	23-95CIP-23-95
31	Martin	Lepak	martin.lepak@aeoa.org	Arrowhead Economic Opportunity		702 S 3rd Ave Virginia MN, 55792 United States	Electronic Service		No	23-95CIP-23-95
32	Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission		1902 6th Ave E Hibbing MN, 55746 United States	Electronic Service		No	23-95CIP-23-95
33	Josh	Mason	jmason@rpu.org	Rochester Public Utilities		4000 E River Rd NE Rochester MN, 55906 United States	Electronic Service		No	23-95CIP-23-95
34	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	23-95CIP-23-95
35	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	23-95CIP-23-95
36	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-95CIP-23-95
37	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	23-95CIP-23-95
38	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	23-95CIP-23-95
39	Audrey	Partridge	audrey.peer@centerpointenergy.com	CenterPoint Energy Minnesota Gas		212 3rd Ave. N. Suite 560 Minneapolis MN, 55401 United States	Electronic Service		No	23-95CIP-23-95
40	Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	23-95CIP-23-95
41	Bill	Poppert	info@technologycos.com	Technology North		2433 Highwood	Electronic Service		No	23-95CIP-23-95

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Ave St. Paul MN, 55119 United States				
42	Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024-9583 United States	Electronic Service		No	23-95CIP-23-95
43	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	23-95CIP-23-95
44	Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		No	23-95CIP-23-95
45	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	23-95CIP-23-95
46	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	23-95CIP-23-95
47	Rick	Sisk	rsisk@trccompanies.com	Lockheed Martin		1000 Clark Ave. St. Louis MO, 63102 United States	Electronic Service		No	23-95CIP-23-95
48	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	23-95CIP-23-95
49	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	23-95CIP-23-95
50	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	23-95CIP-23-95
51	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	23-95CIP-23-95
52	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	23-95CIP-23-95
53	Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-95CIP-23-95
54	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and		200 First St SE	Electronic Service		No	23-95CIP-23-95

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Light Company		Cedar Rapids IA, 52401 United States				

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Julie	Ambach	juliea@cmmmpa.org	Shakopee Public Utilities		255 Sarazin St Shakopee MN, 55379 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
2	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	CIP SPECIAL SERVICE LIST
3	Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
4	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
5	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
6	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
7	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
8	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		No	CIP SPECIAL SERVICE LIST
9	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
10	Patrick	Deal	pdeal@mnchamber.com	Minnesota Chamber of Commerce		400 Robert St N Ste 1500 Saint Paul MN, 55101 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
11	Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.		7701 France Ave S Ste 600 Edina MN, 55435	Electronic Service		No	CIP SPECIAL SERVICE LIST

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
12	Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.		823 E 7th St St. Paul MN, 55106 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
13	Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.		2377 Union Lake Trl Northfield MN, 55057 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
14	Melissa S	Feine	melissa.feine@semcac.org	SEMCAC		PO Box 549 204 S Elm St Rushford MN, 55971 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
15	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	CIP SPECIAL SERVICE LIST
16	Karolanne	Foley	karolanne.foley@dairylandpower.com	Dairyland Power Cooperative		PO Box 817 La Crosse WI, 54602-0817 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
17	Tyler	Glewwe	tyler.glewwe@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
18	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
19	Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
20	Jeffrey	Haase	jhaase@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
21	Joe	Hoffman	ja.hoffman@smmpa.org	SMPMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
22	Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency		702 3rd Ave S Virginia MN, 55792 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
23	Martin	Kapsch	martin.kapsch@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402	Electronic Service		No	CIP SPECIAL SERVICE LIST

[illegible]

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
35	Audrey	Partridge	audrey.peer@centerpointenergy.com	CenterPoint Energy Minnesota Gas		212 3rd Ave. N. Suite 560 Minneapolis MN, 55401 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
36	Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
37	Bill	Poppert	info@technologycos.com	Technology North		2433 Highwood Ave St. Paul MN, 55119 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
38	Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024-9583 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
39	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		No	CIP SPECIAL SERVICE LIST
40	Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
41	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
42	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
43	Rick	Sisk	rsisk@trccompanies.com	Lockheed Martin		1000 Clark Ave. St. Louis MO, 63102 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
44	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
45	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
46	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office	Electronic Service		No	CIP SPECIAL

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States				SERVICE LIST
47	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
48	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
49	Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
50	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST