

**State of Minnesota**  
**Minnesota Public Utilities Commission**

**Utility Information Request**

Docket Number: G-008/M-25-43 - ECO 2024 Status Report      Date of Request: 9/15/2025  
Requested From: CENTERPOINT ENERGY MINNESOTA      Response Due: 9/25/2025  
GAS

Analyst Requesting Information: Danielle Winner

Type of Inquiry: Conservation

***If you feel your responses are trade secret or privileged, please indicate this on your response.***

| Request No. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|-------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| PUC 001     | <p>Topic: Heat Pump Rebate Amounts<br/>Reference(s): CenterPoint Energy's 2024 ECO Status Report</p> <p><b>Request:</b></p> <p>Please provide the rebate amounts offered and provided (in total and on average) for EFS heat pumps in 2024 through CenterPoint Energy's ECO program.</p> <p><b>Response:</b></p> <p>In 2024, CenterPoint Energy spent \$2,313,000 on rebates across its EFS segment. This total includes rebates in the Home Efficiency Rebates ("HER") EFS program and the Nonprofit Affordable Housing Rebates ("NPAH") EFS program. These EFS programs provide rebates for hybrid (i.e., gas/electric) heating systems that meet the full heating load of the home. In 2024, the average hybrid heating system rebate was \$1,391.</p> <p>At the program level, CenterPoint Energy's HER EFS program spent a total of \$2,285,000 on rebates in 2024. Rebates per measure were as follows:</p> <ul style="list-style-type: none"><li>┆ 7.8 HSPF2 ASHP with existing furnace: \$500</li><li>┆ 7.8 HSPF2 ASHP + 92% AFUE furnace: \$1,000</li><li>┆ 7.8 HSPF2 ASHP + 96% AFUE furnace: \$1,250</li><li>┆ 7.8 HSPF2 ASHP + 97% AFUE furnace: \$1,500</li></ul> <p>For context, in 2024 the Company's rebate amounts for 92%, 96%, and 97% AFUE furnaces were \$500, \$750, and \$1,000, respectively.* To qualify for an ASHP rebate, CenterPoint Energy requires the ASHP to be installed with a new high-efficiency gas furnace or for information to be supplied on the</p> |

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back-up furnace to determine if it meets the program requirements.

Separately, CenterPoint Energy's NPAH EFS program spent a total of \$28,000 on rebates in 2024.\*\* This total included both ASHP and non-ASHP measures. The NPAH EFS program's performance pathway rebate amounts are determined by the level of whole-home energy savings achieved above Minnesota residential energy code. As a result, the rebate amounts for individual measures, like ASHPs, are not separated from those for other rebate-eligible measures (e.g., gas furnace, air sealing and insulation).

\* CenterPoint Energy's rebate amounts changed in 2025 following a program modification. Beginning in 2025, the Company's rebates for 92% and 96% AFUE furnaces decreased to \$200 and \$400, respectively. CenterPoint Energy's ASHP rebate, meanwhile, increased to \$1,100 to align with Xcel Energy's entry-level ducted ASHP heating rebate. CenterPoint Energy's 97% AFUE furnace rebate continues to be \$1,000. See *In the Matter of CenterPoint Energy's 2024-2026 Natural Gas Energy Conservation and Optimization Program Triennial Plan*, Docket No. G-008/CIP-23-95, CenterPoint Energy Program Modification Request (October 1, 2024).

\*\* To qualify for NPAH EFS rebates, ASHPs must meet the same equipment requirements as in the HER EFS program, including a minimum 7.8 HSPF2 rating and being installed with a minimum 92% AFUE gas furnace.

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|-------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| PUC 002     | <p>Topic: Heat Pump Participation Count<br/>Reference(s): CenterPoint Energy's 2024 ECO Status Report</p> <p><b>Request:</b></p> <p>Please provide the total number of heat pumps rebated through CenterPoint's 2024 ECO program.</p> <p><b>Response:</b></p> <p>In 2024, total participation in the HER EFS program was as follows:</p> <ul style="list-style-type: none"><li>▮ 7.8 HSPF2 ASHP with existing furnace: 114 measures installed</li><li>▮ 7.8 HSPF2 ASHP + 92% AFUE furnace: 24 measures installed</li><li>▮ 7.8 HSPF2 ASHP + 96% AFUE furnace: 322 measures installed</li><li>▮ 7.8 HSPF2 ASHP + 97% AFUE furnace: 1,201 measures installed</li><li>▮ Program total: 1,661 measures installed*</li></ul> <p>In the 2024 NPAH EFS program, two performance pathway projects included ASHPs.</p> <p>* For context, these hybrid heating systems represented about 10 percent of all ducted systems that CenterPoint Energy rebated in 2024. The Company rebated an additional 15,045 high-efficiency furnaces in 2024.</p> |

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| Request No.                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                       |                                                                 |                                                       |                                              |                                    |                         |      |       |      |        |                               |      |       |      |
|--------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------|-----------------------------------------------------------------|-------------------------------------------------------|----------------------------------------------|------------------------------------|-------------------------|------|-------|------|--------|-------------------------------|------|-------|------|
| PUC 003                                                                                                                                          | Topic: Heat Pump Energy Savings<br>Reference(s): CenterPoint Energy's 2024 ECO Status Report                                                                                                                                                                                                                                                                                                                                                                                      |                                                       |                                                                 |                                                       |                                              |                                    |                         |      |       |      |        |                               |      |       |      |
|                                                                                                                                                  | <b>Request:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                       |                                                                 |                                                       |                                              |                                    |                         |      |       |      |        |                               |      |       |      |
|                                                                                                                                                  | Please provide the total energy savings claimed for heat pumps through CenterPoint's 2024 ECO and the amount that the heat pumps contributed to CenterPoint's requested 2024 ECO utility incentive.                                                                                                                                                                                                                                                                               |                                                       |                                                                 |                                                       |                                              |                                    |                         |      |       |      |        |                               |      |       |      |
|                                                                                                                                                  | <b>Response:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                       |                                                                 |                                                       |                                              |                                    |                         |      |       |      |        |                               |      |       |      |
|                                                                                                                                                  | The table below lists the average gross gas savings, average electric heating increase, average net gas savings, and total net energy savings at the program-level for the HER EFS and NPAH EFS programs in 2024.                                                                                                                                                                                                                                                                 |                                                       |                                                                 |                                                       |                                              |                                    |                         |      |       |      |        |                               |      |       |      |
|                                                                                                                                                  | <table><tr><th>Program</th><th>Per Participant<br/>Average Gross Gas Savings (Dth)/participant*</th><th>Average Electric Heating Increase (kWh)/participant**</th><th>Average Net Gas Savings (Dth)/participant***</th><th>Total Net Dth Savings (Dth/yr)****</th></tr><tr><td>Home Efficiency Rebates</td><td>37.9</td><td>3,428</td><td>26.2</td><td>43,473</td></tr><tr><td>Non-Profit Affordable Housing</td><td>44.4</td><td>2,108</td><td>37.2</td><td>74</td></tr></table> | Program                                               | Per Participant<br>Average Gross Gas Savings (Dth)/participant* | Average Electric Heating Increase (kWh)/participant** | Average Net Gas Savings (Dth)/participant*** | Total Net Dth Savings (Dth/yr)**** | Home Efficiency Rebates | 37.9 | 3,428 | 26.2 | 43,473 | Non-Profit Affordable Housing | 44.4 | 2,108 | 37.2 |
| Program                                                                                                                                          | Per Participant<br>Average Gross Gas Savings (Dth)/participant*                                                                                                                                                                                                                                                                                                                                                                                                                   | Average Electric Heating Increase (kWh)/participant** | Average Net Gas Savings (Dth)/participant***                    | Total Net Dth Savings (Dth/yr)****                    |                                              |                                    |                         |      |       |      |        |                               |      |       |      |
| Home Efficiency Rebates                                                                                                                          | 37.9                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 3,428                                                 | 26.2                                                            | 43,473                                                |                                              |                                    |                         |      |       |      |        |                               |      |       |      |
| Non-Profit Affordable Housing                                                                                                                    | 44.4                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 2,108                                                 | 37.2                                                            | 74                                                    |                                              |                                    |                         |      |       |      |        |                               |      |       |      |
| The EFS segment produced \$1,549,533 in net benefits using the Minnesota Test, the primary cost-effectiveness test. Four percent of net benefits |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                       |                                                                 |                                                       |                                              |                                    |                         |      |       |      |        |                               |      |       |      |

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(\$61,981) contributed to CenterPoint Energy's 2024 ECO financial incentive request.\*\*\*\*\*

\* Input 24 in Exhibit A, tabs HER EFS and NPAH EFS.

\*\* Input 22a in Exhibit A, tabs HER EFS and NPAH EFS.

\*\*\* The HER EFS program's average net gas savings per participant (26.2 Dth) was calculated by converting 3,428 kWh (the average electric heating increase per participant) to 11.7 Dth and subtracting 11.7 Dth from 37.9 Dth (the average gross gas savings per participant). The NPAH EFS program's average net gas savings per participant (37.2 Dth) was calculated by converting 2,108 kWh (the average electric heating increase per participant) to 7.2 Dth and subtracting 7.2 Dth from 44.4 Dth (the average gross gas savings per participant).

\*\*\*\* See *CenterPoint Energy's Natural Gas Energy Conservation and Optimization 2024 Status Report & Associated Compliance Filings*, pp. 69-70, Docket No. G-008/CIP-23-95, et. al, (May 1, 2025).

\*\*\*\*\* See Exhibit A, tab TOTAL EFS. The BENCOST spreadsheets in Exhibit A were originally filed with CenterPoint Energy's 2024 ECO Status Report. To view the full workbook with all ECO program and portfolio BENCOST spreadsheets, see *Natural Gas Energy Conservation and Optimization 2024 Status Report & Associated Compliance Filings*, Docket No. G-008/CIP-25-43 (May. 1, 2025).

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|-------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| PUC 004     | <p>Topic: CenterPoint Energy/Xcel EFS Rebates<br/>Reference(s): CenterPoint Energy's 2024 ECO Status Report</p> <p><b>Request:</b></p> <p>Please provide the total number of heat pumps claimed through CenterPoint's 2024 ECO program that also received a geographic consistency rebate from Xcel Energy.</p> <p><b>Response:</b></p> <p>CenterPoint Energy does not have information on which HER EFS program participants may have received rebates from Xcel Energy or other electric utilities that CenterPoint Energy shares customers with.* CenterPoint Energy discussed this topic with Xcel Energy and understands that most of Xcel Energy's geographic consistency rebates paid were in CenterPoint Energy's service area.</p> <p>CenterPoint Energy is aware that its two NPAH EFS program participants received Xcel Energy rebates. However, CenterPoint Energy does not know if Xcel Energy's geographic consistency policy applies to the rebates for these two projects.</p> <p>* CenterPoint Energy's HER program, which is delivered independently of other utilities' offerings, offers prescriptive rebates (i.e., a predetermined rebate amount per eligible measure) for residential heating equipment. E.g., furnaces and boilers, thermostats, clothes dryers. The Company's trade</p> |

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allies (e.g., dealers, plumbers, retailers) often complete and submit rebate paperwork on customers' behalf.

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| PUC 005     | <p>Topic: CenterPoint Energy/Xcel EFS Rebates<br/>Reference(s): CenterPoint Energy's 2024 ECO Status Report</p> <p><b>Request:</b></p> <p>Please explain how program costs, energy savings, and net benefits used to calculate utility financial incentives were allocated and attributed between Xcel Energy and CenterPoint Energy for heat pumps that received a rebate through ECO from both CenterPoint Energy and Xcel Energy.</p> <p><b>Response:</b></p> <p>As described in response to IR 4, CenterPoint Energy's rebate programs are delivered independently of other utilities' offerings. Therefore, we do not have data on which of our customers have also received rebates from their electric utilities, including Xcel Energy. We do not have any allocation or attribution between the two utilities' programs related to rebates or energy savings. Both utilities did discuss energy savings allocations during our 2024-2026 Triennial planning process and agreed that the Company would claim gas savings net electricity increases and Xcel Energy would claim cooling savings.</p> <p>Regarding program costs, the Company and Xcel Energy do not share costs for our rebate programs. However, we do jointly run the Home Energy Squad program where we share costs, including for heat pump recommendations to customers whose homes are adequately weatherized and determined to be good candidates for heat pump installations. These costs are allocated between CenterPoint Energy and Xcel Energy based on contractually agreed upon splits between utilities for each visit regardless of</p> |

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recommendations.

To estimate the net benefits shown in Exhibit A, provided with the response to IR 3, CenterPoint Energy used:

- 1 The Department-approved BENCOST model.\*
- 1 The Department-recommended avoided electricity costs (input 7)\*\* and avoided electric retail rate (input 2).\*\*\*
- 1 Approved energy savings algorithms to calculate gross gas savings (input 24) and expected electricity increases (input 22a).\*\*\*\* Total Energy Savings are described in the response to IR 3.
- 1 Program costs and other performance metrics for EFS programs are found in CenterPoint Energy's 2024 ECO annual report.\*\*\*\*\*

\* See *In the Matter of 2024-2026 CIP Cost-effectiveness Methodologies for Electric and Gas Investor-Owned Utilities*. Docket No. E,G999/CIP-23-46, Decision (March 31, 2023).

\*\* See *In the Matter of 2024-2026 CIP Cost-effectiveness Methodologies for Electric and Gas Investor-Owned Utilities*. Docket No. E,G999/CIP-23-46, Decision, p. 262 (March 31, 2023).

\*\*\* See *In the Matter of CenterPoint Energy's 2024-2026 Natural Gas Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-23-95, Decision, p. 35 (Dec. 1, 2024).

\*\*\*\* See documentation *In the Matter of CenterPoint Energy's 2024-2026 Natural Gas Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-23-95, Decision, p. Exhibit A (Sept. 9, 2023).

\*\*\*\*\* See *Natural Gas Energy Conservation and Optimization 2024 Status Report & Associated Compliance Filings*, Docket No. G-008/CIP-25-43, p. 67 (May. 1, 2025).