

May 31, 2024

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce, Division of Energy Resources
In the Matter of The Company's First Natural Gas Innovation Act Innovation Plan
Docket No. G008/M-23-215

Dear Mr. Seuffert:

On May 15, 2024, the Minnesota Department of Commerce, Division of Energy Resources (Department) submitted its Reply Comments¹ to the Minnesota Public Utilities Commission (Commission) regarding the Natural Gas Innovation Act Innovation Plan² of CenterPoint Energy (CPE, CenterPoint, or the Company). In its Initial Comments³ and Reply Comments the Department made many recommendations, among which were the recommendation that the Commission deny CenterPoint's proposed Pilot O and to reclassify a portion of Pilot E's expense as R&D spending. On May 23, 2024, the Department was emailed by Commission staff requesting clarification on the Department's position on these two items, as Minn. Stat. § 216B.2427, subd. 6 requires that the Company's innovation plan include a pilot program similar to Pilot O, and as the Department's proposed reclassification of a portion of Pilot E's expense resulted a budget that resulted in more than 10% of the plan's budget going toward R&D projects, which violates a limit set by Minnesota Statute § 216B.2427, Subd. 3 (g). Below is the Department's response to these two clarifying questions.

First, in response to the question regarding the Department's recommendation that the Commission deny the Company's Pilot O, the Department notes that Company's proposed Pilot O did not meet the criteria required by Minn. Stat. § 216B.2427, subd. 6, as the statute specifically requires that, "[t]he pilot program must provide incentives for businesses to implement recommendations made by the audit." The Company's proposed Pilot O included the required audit, but the possible incentives for businesses to implement the recommendations are contingent on participation in Pilots H and M. The

¹ Department of Commerce, Division of Energy Resources, *Comments*, Docket No. G008/M-23-215 (May 15, 2024) (eDocket# [20245-206792-02](#))

² In the Matter of Petition by CenterPoint Energy for Approval of its First Natural Gas Innovation Plan, Docket No. G008/M23-215, CPE Petition, (June 28, 2023). (eDocket No. [20236-196995-01](#))

³ Department of Commerce, Division of Energy Resources, *Reply Comments*, Docket No. G008/M-23-215 (January 16, 2024) (eDocket# [20241-202261-02](#))

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Department recommends denial of Pilots H and M, because they were programs that could already have been implemented under the ECO program. If the Commission were to implement the Department's recommendations regarding Pilots H and M—then the Company's proposed Pilot O would still not comply with the statutory requirement to provide incentives for businesses to implement the recommendations of the audit. As the Department maintains its position that the Commission should deny the Company's proposed Pilots H and M, the Department recommends that the Commission require CPE to file another independent version of Pilot O compliant with subd. 6 within 60 days of the Commission's Order on the Company's Natural Gas Innovation Act Innovation Plan.

Second, in response to the question about the Department's recommendation resulting in a budget that allocates more than 10% of the Plan's budget toward R&D in violation of Minnesota Statute § 216B.2427, subd. 3 (g), the Department notes that the higher percentage was caused by the Department's recommendation to reclassify a portion of Pilot E's expense as R&D spending. Because there is not a firm definition of what is or is not R&D spending in the relevant statute, the Department concludes that this issue could be resolved by the removal of Department's recommendation to reclassify that portion of Pilot E's costs as R&D spending. The Department calculated that doing so would result in R&D spending for the Plan's budget falling back below the 10 percent cap. As such the Department withdraws its recommendation to reclassify a portion of Pilot E's costs.

Sincerely,

/s/ Dr. Sydnie Lieb

Assistant Commissioner of Regulatory Affairs

CERTIFICATE OF SERVICE

I, Nicole Westling, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Letter**

Docket No. G008/M-23-215

Dated this **31st** day of **May 2024**

/s/Nicole Westling

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