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November 20, 2025

Sydney Lieb, Ph.D.  
Assistant Commissioner of Regulatory Analysis  
Minnesota Department of Commerce  
Division of Energy Resources  
85 7th Place East, Suite 500  
St. Paul, MN 55101-2198

**VIA ELECTRONIC FILING**

**Re: In the Matter of Minnesota Technical Reference Manual Version 5.0 Docket No. E,G999/CIP-18-694**

Dear Dr. Lieb:

On October 29, 2025, the Minnesota Department of Commerce, Division of Energy Resources ("Department"), issued a Proposed Decision on the Technical Reference Manual Version 5.0 ("TRM"), in the above-referenced docket. Minnesota Energy Resources Corporation ("MERC" or the "Company") respectfully submits these Comments in response to the Department's Notice of Proposed TRM Version 5.0.

The purpose of the TRM is to put forth standard methodologies and inputs for calculating the savings impacts and cost-effectiveness of Energy Conservation and Optimization ("ECO") Programs in Minnesota. Ultimately, TRM Version 5.0 will be used by utilities to calculate the savings impacts of ECO measures installed in 2027. MERC has actively participated in the TRM Advisory Committee ("TRMAC") process and thanks the Department and Cadmus for leading that process and for their work in the development of the draft TRM Version 5.0.

MERC is also submitting Joint Utility Comments detailing concerns regarding the process and technical issues related to the proposed update to the Residential furnace baseline from 80% AFUE to 90% Annual Fuel Utilization Efficiency ("AFUE") for furnaces, insulation, ECM blower motors, and ground source heat pumps. As detailed in those Joint Utility Comments, the Draft TRM Version 5.0 proposes inconsistent application of the updated baseline across various measures—applied to some but not others—without technical support and based on a Wisconsin survey of efficiency contractors that does not provide a reasonable baseline for what consumers would be expected to install in the absence of efficiency programming in Minnesota. The proposed modifications, if applied to utility triennial ECO plans, have the potential to significantly mischaracterize savings and cost-effectiveness of measures based on selective application of survey results that may not reasonably reflect Minnesota customer baselines, and that have not been fully analyzed, vetted, or researched for application in Minnesota efficiency programs.

MERC respectfully submits these additional comments related to implications for MERC customers. MERC recommends that the furnace baseline remain at 80% in TRM 5.0 for the reasons discussed in the Joint Utility Comments and in these comments.

Selectively increasing the furnace baseline to 90% AFUE for some measures could significantly undermine MERC's ability to achieve cost-effective savings for Residential furnaces, insulation, and other measures. This modification could result in decreased rebate levels to cover the incremental cost between the new assumed baseline and higher efficiency natural gas furnaces. This effectively narrows customer choices for high efficiency furnaces and results in higher upfront costs to customers weighing the purchase of a replacement heating system.

As a result, MERC customers may delay purchasing decisions, or as an unintended consequence, ultimately purchase a cheaper, lower efficiency furnace. This is especially a concern for low-income customers who rely on MERC ECO programs to cover the cost of reliable high efficiency natural gas equipment. Low-income customers are highly sensitive to energy costs, and less likely to adopt efficiency measures without rebates, which underscores the importance of ECO rebate programs. These customers would miss out on short and long-term energy savings and comfort benefits throughout the lifetime of the newer, high-efficient equipment. And while the proposed updates to TRM baselines exclude air source heat pumps ("ASHPs") due to the "significant amount of work required" for the update, the higher upfront equipment and installation costs as well as potentially higher overall utility bills are likely to cause customers to opt for lower efficiency furnaces.

In Minnesota's cold climate, heat pumps are less effective during periods of extreme cold, which can further increase monthly energy bills for customers who depend on reliable and affordable heating. Additionally, because of Minnesota's cold climate, air-source heat pumps often require a natural gas backup system for periods when temperatures drop below the heat pump's effective operating range. The proposed furnace baseline update may ultimately hinder efficient fuel-switching efforts by diminishing the cost-effectiveness of high-efficiency gas furnaces as necessary backup systems for air-source heat pumps. MERC will need to carefully consider these potential implications as it evaluates the practicality of implementing an efficient fuel switching program with ASHPs.

Further, a baseline change not rooted in market reality can disrupt sales practices, create confusion, and decrease contractor engagement. This could potentially undermine MERC's relationships with valuable trade allies who help drive efficiency adoption across the state. Trade allies play a central role in connecting customers to energy efficient equipment and without trade ally engagement and support, rebate programs struggle to reach households effectively.

Without research supporting Minnesota market shifts in Residential furnace baselines, updating the baseline prematurely misrepresents current customer behavior. The baseline should represent the equipment customers would reasonably install in the absence of an efficiency program. Evidence shows customers are still purchasing standard-efficiency furnaces when incentives are removed. Standard efficiency equipment is often widely available and familiar, making it the default choice when incentives are absent. Low-income households are

disproportionately affected, as they are more price-sensitive and less able to absorb higher upfront costs.

In light of these considerations and those presented in the Joint Utility comments, MERC requests that the proposed Residential Furnace baseline update be further evaluated through the TRMAC process before being considered for inclusion in the Minnesota TRM.

Please contact me at (651) 322-8917 or [jennifer.kimmen@wecenergygroup.com](mailto:jennifer.kimmen@wecenergygroup.com) if you have any questions regarding these Comments.

Sincerely,

A handwritten signature in dark ink, reading "Jennifer A. Kimmen". The signature is fluid and cursive, with the first name "Jennifer" being larger and more prominent than the last name "Kimmen".

Jennifer Kimmen  
Senior Customer Program Manager  
WEC Business Services, Inc.

cc: Service Lists

**CERTIFICATE OF SERVICE**

I, Kristin M. Stastny, hereby certify that on the 20th day of November, 2025, on behalf of Minnesota Energy Resources Corporation (MERC), I electronically filed a true and correct copy of the enclosed Comments on [www.edockets.state.mn.us](http://www.edockets.state.mn.us). Said documents were also served via U.S. mail and electronic service as designated on the attached service lists.

Dated this 20th day of November, 2025.

/s/ Kristin M. Stastny

Kristin M. Stastny

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3	Kathy	Baerlocher	kathy.baerlocher@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	18-694CIP-18-694
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19	Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.		2377 Union Lake Trl Northfield MN, 55057 United States	Electronic Service		No	18-694CIP-18-694
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26	Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	18-694CIP-18-694
27	Jeffrey	Haase	jhaase@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove	Electronic Service		No	18-694CIP-18-694



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57	Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		No	18-694CIP-18-694
58	Ben	Schoenbauer	bschoenbauer@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	18-694CIP-18-694
59	Rob	Scott Hovland	rob.scott-hovland@mrenergy.com	Missouri River Energy Services		3724 W Avera Dr PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	18-694CIP-18-694
60	Rick	Sisk	rsisk@trccompanies.com	Lockheed Martin		1000 Clark Ave. St. Louis MO, 63102 United States	Electronic Service		No	18-694CIP-18-694
61	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	18-694CIP-18-694
62	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	18-694CIP-18-694
63	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	18-694CIP-18-694
64	Analeisha	Vang	avang@mnpower.com			30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	18-694CIP-18-694
65	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	18-694CIP-18-694

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8	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
9	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
10	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
11	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	ECO SPECIAL SERVICE LIST

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15	Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.		823 E 7th St St. Paul MN, 55106 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
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23	Jeffrey	Haase	jhaase@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
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52	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
53	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
54	Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
55	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
56	Cristina	Zuniga	czuniga@otpc.com	Otter Tail Power Company		215 South Cascade Street PO Box 496 Fergus Falls MN, 56538 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST