



January 28, 2026

VIA eFILING

Ms. Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2116

**RE: In the Matter of Commission Review of Utility Performance Incentives for
Energy Conservation
Docket No. E,G-999/CI-08-133**

Supplemental Comments

Dear Ms. Bergman:

CenterPoint Energy Resources Corp.'s, d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or the "Company") respectfully submits the following *Supplemental Comments* in response to the Center for Energy and Environment ("CEE"), Minnesota Department of Commerce, Division of Energy Resources' (the "Department"), and Fresh Energy's ("Joint Commenters") proposed modification (the "*Revised Proposal*") to the *Proposal for Modifications to the Shared Savings DSM Financial Incentive Mechanism for Implementation Beginning in 2027* (the "*Proposal*"). This *Revised Proposal* was filed on January 22, 2026.

CenterPoint Energy appreciates the opportunity to offer these *Supplemental Comments* on the *Proposal* for the gas financial incentive mechanism. If you have questions, please contact me at (612) 321-4324 or ethan.warner@centerpointenergy.com.

Sincerely,

/s/ Ethan Warner

Ethan Warner

Regulatory Affairs Manager, Energy Conservation and Optimization Programs

Attachments

C: Service List

STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION
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Hwikwon Ham	Commissioner
Audrey Partridge	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

In the Matter of Commission Review of
Utility Performance Incentives for Energy
Conservation

Docket No. G999/CI-08-133

CenterPoint Energy’s
SUPPLEMENTAL COMMENTS on the
REVISED PROPOSAL

I. INTRODUCTION

CenterPoint Energy Resources Corp.’s, d/b/a CenterPoint Energy Minnesota Gas (“CenterPoint Energy” or the “Company”) respectfully submits the following *Supplemental Comments* in response to the Center for Energy and Environment (“CEE”), Minnesota Department of Commerce, Division of Energy Resources’ (the “Department”), and Fresh Energy’s (“Joint Commenters”) proposed modification (the “*Revised Proposal*”) to the *Proposal for Modifications to the Shared Savings DSM Financial Incentive Mechanism for Implementation Beginning in 2027* (the “*Proposal*”).

The Minnesota Public Utilities Commission’s (“Commission”) Notice of Comment Period (“Notice”) issued July 16, 2025, was issued in response to the Joint Commenters’ *Proposal* on June 26, 2025.

CenterPoint Energy submitted *Comments* on August 13, 2025, and *Reply Comments* on September 15, 2025, in response to the Joint Commenters’ *Proposal*. The *Proposal*, if adopted, would introduce the first multi-factor shared savings financial incentive mechanism (“gas financial incentive mechanism”) in Minnesota. CenterPoint Energy supports the goals of the multi-factor mechanism to increase annual energy savings, low-income spending, and air sealing and insulation for residential customers. The Company

did not have significant concerns with the annual energy savings or the new low-income spending metrics. However, the Company believes that the air sealing and insulation metric would not provide significant incentive to the utility to prompt increases in cost-effective energy conservation. Air sealing and insulation measures are encouraged in the current gas incentive mechanism as a source of annual and lifetime energy savings with significant net benefits. The Company believes that the major barriers to completion of residential air sealing and insulation projects are difficult to address through Energy Conservation and Optimization (“ECO”) programs alone,¹ especially in the near-term.

On January 9, 2026, the Department filed the final version of Technical Reference Manual 5.0 (“TRM 5.0”).² TRM 5.0, proposed and adopted by the Department, revised the furnace baseline assumptions for residential heating, ventilation, and air conditioning equipment and most air sealing and insulation measures from 80 percent AFUE to 90 percent AFUE. The Company is still working through how this decision will affect the design of the triennial plan for 2027-2029. However, as noted in the Company’s comments, it expected that it would need to right size rebates based on energy savings (and net benefits) potential, adjust programming to make up for energy savings losses through mostly the commercial and industrial sector, and pause long-term innovation to focus on immediate impactful portfolio changes.³

In response to the TRM 5.0 decision, the Joint Commenters filed a *Revised Proposal* on January 22, 2026, seeking to recalibrate the *Proposal* to account for changes to potential energy savings achievable under TRM 5.0 assumptions.

II. REVIEW OF THE REVISED PROPOSAL

CenterPoint Energy appreciates all the work the Joint Commentors put towards developing the 2027-2029 shared savings financial incentive mechanism. The Company also especially appreciates the transparent and collaborative process CEE has run to try and find consensus on the mechanism.

CenterPoint Energy reviewed the *Revised Proposal* and can only support part of the proposed modifications. Joint Commenters proposed two modifications to the original proposal:

¹ Barriers include competing customer priorities for home improvements, a need for additional customer education, and non-financial customer costs to completing projects.

² See *In the Matter of Technical Reference Manual Version 5.0*. Docket No. E,G-999/CIP-18-694. (January 9, 2026).

³ See *In the Matter of Technical Reference Manual Version 5.0* Docket No. E,G-999/CIP-18-694. *CPE* Comments. Pg 8-9. (November 20, 2025).

- Modification 1: Insulation and Air Sealing First-Year Savings Threshold and Goals
- Modification 2: Net Benefits Scale

CenterPoint Energy supports modification 1 as addressing the changes proposed by TRM 5.0 that affect insulation and air sealing per project energy savings. This does not address the Company's prior concerns with accurate calibration of the mechanism for what is achievable in 2027-2029 for air sealing and insulation.⁴

Regarding modification 2, CenterPoint Energy has concerned that the new multi-factor financial mechanism may not be calibrated for market conditions on top of recent TRM 5.0 changes. While the Company has not had the time to thoroughly evaluate the relative financial incentive benefits of different portfolio designs, the Company expects through preliminary analysis decreasing energy savings and net benefits from residential customers as well as rising costs for customers are likely to erode rather than focus efforts on air sealing and insulation, at least outside low-income programming.

CenterPoint Energy appreciates that the Joint Commenters acknowledge the challenges to maintain or exceed past performance levels. However, the Company believes qualitative assessment by the Joint Commenters in proposing the 0.5 percent increase appears to be focused only on upside potential that was already noted by the utilities as unlikely before the TRM 5.0 decision. CenterPoint Energy acknowledges the potential for redesign and redevelopment of its ECO programs to mitigate the decrease in the financial incentive. As an example, mentioned in the *Revised Proposal*, the Department would also allow utilities to claim higher savings if they are able to document that an 80 percent AFUE furnace is replaced. However, even if one assumes that this approach leads to additional energy savings without negative effects on participation through increased administrative barriers, the "conservative" view presented by Joint Commenters does not consider the full sources of risk and uncertainty going into Triennial Planning necessary to fully calibrate an appropriate net benefits cap.

III. 2027-2029 COST-EFFECTIVENESS FRAMEWORK

The major factor that concerns CenterPoint Energy is a significant decline in gas commodity costs expected to be used in the 2027-2029 cost-effectiveness framework for CenterPoint Energy. On October 31, 2025, the Department issued its ECO Cost-Effectiveness Advisory Committee Summary Report.⁵ The report recommends switching

⁴ See *In the Matter of Commission Review of Utility Performance Incentives for Energy Conservation*. Docket No. E,G-999/CI-08-133, CPE (Aug. 13, 2025).

⁵ *ECO Cost-Effectiveness Advisory Committee Summary Report 2027-2029 ECO Program Period*. Department of Commerce Staff and Mendota Group. pg. 15 (October 31, 2025).

from a single weighted gas utility commodity cost to one based on individual gas utility commodity costs. In the future, these individual gas commodity costs will be replaced by gas cost forecasts used in gas Integrated Resource Plans. Utilities provided informal comments on the proposals, but consideration of the effects of the framework on the financial incentive have been considered out of scope by Department Staff. The Company did not have statutory or factual concerns with gas utilities using either individual utility gas commodity costs or a weighted average across the industry.

On December 8, 2025, Department Staff requested that gas utilities provide the utility's monthly purchased gas adjustment ("PGA") costs (24 months of historical data from November 2023 through October 2025) and the utility's monthly total dekatherm ("Dth") sales to ECO non-exempt customers. The data supplied is included in Exhibit A and shows a weighted average cost of gas of \$3.30 per Dth. Therefore, CenterPoint Energy is expecting its gas commodity cost to change from \$4.52 (in the 2024-2026 cost-effectiveness framework)⁶ to \$3.30 per Dth for the expected 2027-2029 cost-effectiveness framework.⁷ Exhibit B shows how the inclusion of this change affects net benefits for 2024, reducing benefits by about 16 percent. When layering on the effect of the increase in furnace baseline from the TRM 5.0 decision, the Company is expecting a roughly combined 35 percent reduction in net benefits as the result of these changes.⁸ CenterPoint Energy revised the Join Commenters' incentive model to incorporate the effects of commodity cost changes expected to affect net benefits.⁹ The 2024 results under the revised proposal (see Exhibit C):

- Decreases from \$6,368,994 to \$5,207,454 based on 2024 performance.
- Decreases from \$8,733,065 to \$7,140,380 based on the 5.5 percent net benefits cap.

CenterPoint Energy's best estimate of the gas utility cost-effectiveness framework is that while there are similar potentially impactful changes,¹⁰ commodity costs are a key factor for determining net benefits in the upcoming triennial period. In practice, the recalibration in the *Revised Proposal* seems likely to lead to significant cuts to the financial incentive

⁶ See *In the Matter of 2024-2026 CIP Cost-Effectiveness Methodologies for Electric and Gas Investor-Owned Utilities*. Decision. Docket No. E,G999/CIP-23-46. Appendix L. (March 31, 2023).

⁷ Exhibit A Sales Weighted Gas Commodity Costs.xlsx.

⁸ See Exhibit B 2024 ECO Cost-Effectiveness Scenarios.xlsx. For simplicity these scenarios hold all else equal and do not incorporate program redesigns.

⁹ CenterPoint Energy acknowledges that if the Department takes a different approach to its cost-effectiveness framework that its specific concerns about decreasing commodity costs in combination with a large energy savings cut may be addressed.

¹⁰ For example, the U.S. Annual Energy Outlook forecasting lower long-term prices than assumed in the 2024-2026 triennial period and updates to the Company's demand costs based on March 2026's purchased gas adjustment.

and is more likely to encourage pursuit of reduced costs and the most cost-effective energy savings which are in the C&I customer segment.

The Company believes gas commodity costs are a necessary component of calibration, but other factors that are contributing to our concerns about what is feasible for ECO program performance in the next triennial include but are not limited to:

- Further energy savings reductions as part of the triennial planning process.
- Cost inflation driven by a combination of policy and market factors increasing project costs for customers and program costs reducing the influence of rebates or ECO program services.
- Changes to cost effectiveness performance eroding the ability to sustain existing rebate levels or to increase rebate levels in order to maintain effectiveness.
- General economic uncertainty affecting investments by residential, commercial, and industrial customers.

IV. CENTERPOINT ENERGY'S PROPOSED DECISION OPTION

CenterPoint Energy's analysis of the *Revised Proposal* incentive model is that to fully compensate for changes to its gas commodity costs that a net benefits cap of about 6.75 percent would be needed to approximate the incentive model submitted in the *Revised Proposal* by Joint Commenters. That said, the Company believes that the TRM 5.0 decision and the state of the market have led to further uncertainty for 2027-2029 ECO program design and performance and that the proposed multi-factor model cannot realistically be recalibrated for the upcoming triennial period.

CenterPoint Energy recommends that the net benefits cap be raised to 6 percent. The Company is supportive of introducing this change using the pre-existing weightings between the metrics and only increasing the maximum benefit award. CenterPoint Energy proposes this change in the net benefits cap for the following reasons:

- It allows for a performance incentive in alignment with recent years that the Company can achieve through maximizing net benefits across all three metrics.
- Joint Commenters' proposals have appeared designed to reduce the financial incentive for gas utilities, so this preserves that implicit goal for at least Xcel Energy and CenterPoint Energy.
- It is calibrated at a level that allows for consistency among the gas utilities.

This change can be found implemented in the "Mod_2024_Gas Est_CPE 6.00%" tab of Exhibit C. The 2024 achievement results under the revised proposal are:

- Decreases from \$6,368,994 to \$5,645,326 based on 2024 performance (green cells in Exhibit C).

- Decreases from \$8,733,065 to \$7,789,505 based on the 6 percent net benefits cap (orange cells in Exhibit C).

V. CONCLUSION

CenterPoint Energy appreciates the opportunity to provide these *Supplemental Comments* on the Joint Commenter's *Revised Proposal* for the 2027-2029 gas utility shared savings financial incentive mechanism. CenterPoint Energy appreciates that the Joint Commenters acknowledge the challenge of maintaining or exceeding past performance levels. However, the Company believes the qualitative assessment by the Joint Commenters in proposing the 0.5 percent increase to be focused only on upsides that were unlikely before the TRM 5.0 decision. CenterPoint Energy expects based on what it knows about the 2027-2029 cost-effectiveness framework that changes to commodity costs need to be accounted for in the calibration to avoid significant reductions in the financial incentive for the Company and therefore the potential significant changes to programming.

To address CenterPoint Energy's main concern with the *Revised Proposal*, declining commodity costs,¹¹ the Company proposes the following changes to the *Revised Proposal*.¹² Below, the changes to the *Revised Proposal* are shown in red cross out and replaced with red underlines for emphasis.¹³

- For natural gas utilities:
 - Allow utilities to begin collecting an incentive for each metric when they reach the following performance levels:
 - First-year energy savings of 0.7 percent of weather-normalized average retail sales, at which the utility can collect 1.44 percent of portfolio net benefits.
 - Insulation and air sealing first-year energy savings equal to one-third of the utility's average 2027-2029 insulation and air sealing first-year energy savings program potential (calculated using the 2018 Minnesota Energy Efficiency Potential Study and recalibrated

¹¹ CenterPoint Energy remains concerned about how reasonable the calibration of the air sealing and insulation portion of the mechanism is to reality, but if the Company's proposal were adopted it would also reduce its concerns about this source of uncertainty.

¹² See *In the Matter of Commission Review of Utility Performance Incentives for Energy Conservation*, Docket No. E,G-999/CI-08-133, Joint Commenters (Jan. 22, 2026).

¹³ Exhibit C CPE Revised Attachment A Modifications submitted with this modification request shows the incentive mechanism revised according to the Company's proposed modifications as well as CEE et al.'s original revised proposal.

- for a 90 percent AFUE furnace baseline), at which the utility can collect 0.48 percent of portfolio net benefits.
- Low-income spending of 1.0 percent of residential gross operating revenue (“GOR”), at which the utility can collect 0.48 percent of portfolio net benefits.
- Set metric-specific net benefit caps at:
 - ~~3.3~~ 3.60 percent of portfolio net benefits for first-year energy savings, awarded for an achievement of 1.2 percent of weather-normalized average retail sales or higher.
 - ~~1.1~~ 1.20 percent of portfolio net benefits for insulation and air sealing first-year energy savings, awarded for an achievement equal to the utility’s insulation and air sealing first-year energy savings program potential (calculated using the 2018 ECO Potential Study and recalibrated for a 90 percent AFUE furnace baseline).
 - ~~1.1~~ 1.20 percent of portfolio net benefits for low-income spending, awarded for an achievement of 2 percent of average residential Gross Operating Revenue or higher.
 - Use linear interpolation to award the appropriate percentage of net benefits for performance levels between the achievement threshold and net benefits cap.
 - Set a total Net Benefits Cap equal to ~~5.5~~ 6.0 percent of portfolio net benefits. The total Net Benefits Cap corresponds with maximum achievement in all three metrics.
 - Set an Expenditures Cap of 20 percent of total portfolio expenditures, which increases to 25 percent if the utility achieves first-year energy savings of 1.2 percent of weather-normalized average retail sales or higher.

CenterPoint Energy thanks the Commission for its consideration of these *Supplemental Comments*.

In the Matter of Commission Review of Utility Performance Incentives for Energy Conservation	Docket No. E,G-999/CI-08-133
January 28, 2026	Supplemental Comments

CERTIFICATE OF SERVICE

I, Tyler Glewwe, served the attached *Supplemental Comments* of CenterPoint Energy on the attached service list for Docket No. E,G-999/CI-08-133 by electronic service.

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Regulatory Analyst
CenterPoint Energy

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#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
36	Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company		4902 N Biltmore Ln PO Box 77007 Madison WI, 53707-1007 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
37	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	ECO SPECIAL SERVICE LIST
38	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
39	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
40	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
41	Larry	Oswald	larry.oswald@mdu.com	Great Plains Natural Gas Company		105 W Lincoln Ave PO Box 176 Fergus Falls MN, 56538-9001 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
42	Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
43	Bill	Poppert	info@technologycos.com	Technology North		2433 Highwood Ave St. Paul MN, 55119 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
44	Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024-9583 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
45	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	ECO SPECIAL SERVICE LIST
46	Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501	Electronic Service		No	ECO SPECIAL SERVICE LIST

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
47	Laura	Silver	laura.silver@state.mn.us		Department of Commerce	85 7th Place E, Suite 500 St. Paul MN, 55101 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
48	Rick	Sisk	rsisk@trccompanies.com	Lockheed Martin		1000 Clark Ave. St. Louis MO, 63102 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
49	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
50	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
51	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
52	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
53	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
54	Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
55	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
56	Cristina	Zuniga	czuniga@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