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– VIA ELECTRONIC FILING –

July 26, 2018

Christopher T. Davis
MN Dept. of Commerce
85 7th Place East, Suite 280
Saint Paul, MN 55101-2198

RE: 2018 DSM Financial Incentive/CIP Project Rider

Shared Savings DSM Financial Incentive Information Request 1

Docket No. G-008/M-19-298

Dear Mr. Davis,

Enclosed please find CenterPoint Energy Resources Corp.'s, d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or the "Company"), response to the Department of Commerce's information request number one, filed in Docket Number G-008/CIP-19-298.

This response has been efiled with the Minnesota Department of Commerce and is available for review at <https://www.edockets.state.mn.us/EFiling/home.jsp>.

Please contact me at (612) 321-4324 or ethan.warner@centerpointenergy.com with any questions

Sincerely,

/s/ Ethan S. Warner

Ethan S. Warner
Regulatory Analyst, Conservation Improvement Program
CenterPoint Energy

C: Service List

Minnesota Department of Commerce
Division of Energy Resources
Information Request

Docket Number: G-008/M-19-298 Nonpublic Public
Requested From: CenterPoint Energy Date of Request: 7/16/2019
Ethan Warner
Type of Inquiry: General Response Due: 7/26/2019
Requested by: Christopher T. Davis
Email Address(es): Christopher.Davis@state.mn.us
Phone Number(s): 651-539-1822

Request Number: 1
Topic: Shared Savings DSM Financial Incentive Plan
Reference(s): 2021-2023 Shared Savings incentive Plan

Request:

- a. Please re-estimate CenterPoint's 2017 and 2018 Shared Savings financial incentive assuming that the expenditures and energy savings were identical to 2017 and 2018 actual achievements, but that CenterPoint's avoided gas commodity costs were reduced to the levels approved by Commerce's Deputy Commissioner in Docket No. E999/18-782 for the gas IOU 2021-2023 CIPs.
- b. Please conduct the same analysis as specified in part a above, except assume that for 2017 and 2018 the CIP expenditures cap is equal to 30 percent and the net benefits cap is equal to 10 percent.
- c. Please conduct the same analysis as specified in part b above, but assume that there is no CIP expenditures cap.
- d. Please repeat the analyses specified in parts a-c above, but assume that when calculating net benefits that the net present value is calculated using a societal discount rate of 3.02 percent, instead of CenterPoint's weighted average cost of capital.
- e. Are there incentive mechanisms in other states with features and outcomes that Minnesota should consider?

Response:

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or the "Company"), calculated what the Company's 2017 and 2018 financial incentive would have been under the conditions described by the Minnesota Department of Commerce Staff ("DER Staff") in Information Request (IR) 1 a-d. Corresponding to each part of DER Staff's request (i.e., a-d), Table 1 lists the Company's interpretation of the conditions DER Staff requested the Company use to calculate the financial incentive along with the financial incentive results. For reference, the Company also included a "baseline" entry indicating the actual 2017 and 2018 financial incentive calculation inputs and results.

Response Date: July 26, 2019
Response by: Ethan Warner
Email Address: ethan.warner@centerpointenergy.com
Phone Number: 612-321-4324

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Table 1. 2017 and 2018 Financial Incentives for Information Request (IR) 1 a-d

Response Corresponds to IR	Financial Incentive Mechanism	Discount Rate	Avoided Costs of Gas	Financial Incentive - Program Year 2017	Financial Incentive - Program Year 2018
n/a - Baseline	As currently approved	6.44%	\$4.27/Dth	\$12,456,038	\$11,317,175
1a	As currently approved	6.44%	\$3.25/Dth	\$12,456,038	\$8,442,440
1b	Capped at 10% of net benefits or 30% of spending	6.44%	\$3.25/Dth	\$9,342,028	\$7,035,366
1c	Capped at 10% of Net Benefits ONLY	6.44%	\$3.25/Dth	\$12,433,687	\$7,035,366
1d	As currently approved	3.02%	\$3.25/Dth	\$12,456,038	\$11,197,859
1d	Capped at 10% of net benefits or 30% of spending	3.02%	\$3.25/Dth	\$9,342,028	\$9,331,549
1d	Capped at 10% of Net Benefits ONLY	3.02%	\$3.25/Dth	\$16,040,801	\$9,331,549

e. CenterPoint Energy would like to bring to DER Staff's attention that Illinois's 2016 Future Energy Jobs Act encourages energy efficiency through a return on investment. The Company does not have a position on whether this approach makes sense for Minnesota to adopt, but it is a new approach the Company is aware of.

Other than Illinois, CenterPoint Energy believes that the record in Docket No. E,G-999/CI-08-133 includes references to existing studies or reviews of incentive mechanisms and could be used to inform current discussions of the financial incentive mechanism for the 2021-2023 Triennial period. For example, the Company's comments in this docket cite the American Council for an Energy Efficient Economy review of existing performance incentives.^{1 2} The Company is not aware of additional

¹ See *CenterPoint Energy Reply Comments on the 2015 Department of Commerce, Division of Energy Resources Report on the Impacts of the 2010-2014 Shared Savings Demand-Side Management (DSM) Financial Incentive on Investor-Owned Utility Conservation Achievements and Customer Costs*, Docket No. E,G-999/CIP-08-133, (Aug. 17, 2015).

² American Council for an Energy Efficient Economy. *Beyond Carrots for Utilities: A National Review of Performance Incentives for Energy Efficiency*, available at <https://aceee.org/research-report/u1504> (last visited July 26, 2019).

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reviews that have been conducted since Minnesota last considered changes to the CIP financial incentive mechanism.

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Email Address: ethan.warner@centerpointenergy.com
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Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S Virginia, MN 55792	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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Martin	Lepak	Martin.Lepak@aeoa.org	Arrowhead Economic Opportunity	702 S 3rd Ave Virginia, MN 55792	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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