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Xcel Energy

Information Request No.

1

Docket No.: E002/M-25-50

Response To: Minnesota Public Utilities Commission

Requestor: Danielle Winner

Date Received: September 15, 2025

Question:

Please provide the rebate amounts offered and provided (in total and on average) for EFS heat pumps in 2024 through Xcel Energy's ECO program.

Response:

The Company provides the rebate amounts offered as part of our 2024-2026 ECO Triennial in Table 1 below.

Table 1: Rebates Offered in 2024 for EFS Heat Pumps

Equipment	Rebate
Air Source Heat Pump	\$1,600
Cold Climate Air Source Heat Pump	\$2,000
Mini-Split Heat Pump	\$1,600
Cold Climate Mini-Split Heat Pump	\$2,000
Ground Source Heat Pump	\$500/ton
Heat Pump Water Heater	\$400
Heat Pump Water Heater w/ Communications Port	\$500

Table 2 provides the rebates submitted and provided to customers in 2024. In total there were 5,056 heat pumps rebated in 2024 where the average rebate was \$1,674.

Table 2: Rebates provided in 2024 for EFS Heat Pumps

Fuel	Total Rebate Amounts
Electric Energy Efficiency	\$2,431,057
Electric Efficient Fuel Switching	\$3,100,800
Natural Gas Efficient Fuel Switching	\$2,930,389
Total	\$8,462,246

Cold climate and non-cold climate air source heat pumps—including mini-split systems—were the primary contributors to rebate expenditures shown in Table 2.

The Electric Efficient Fuel Switching category reflects geographic consistency rebates issued to the Company’s electric-only customers, while the Natural Gas Efficient Fuel Switching category includes rebates provided to customers with Xcel Energy natural gas service.

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Xcel Energy

Information Request No.

2

Docket No.: E002/M-25-50

Response To: Minnesota Public Utilities Commission

Requestor: Danielle Winner

Date Received: September 15, 2025

Question:

Please explain the “geographic consistency” policy Xcel Energy employs for efficient fuel switching measures and how energy savings for measures rebated through this policy are claimed across utilities.

Response:

As described in the Company’s 2024-2026 ECO Triennial Plan, the Geographic Consistency policy is intended to “support consistency of incentives for customers considering [efficient fuel switching] measures that would lead to increased use of electricity provided by Xcel Energy, regardless of the provider of the fuel that the customer is switching away from.”¹ Through the policy, when a customer installing an efficient fuel switching (“EFS”) measure receives electric service from Xcel Energy but receives natural gas (or other fuel) from a different provider,

the Company will compare the incentive (if any) provided by the incumbent fuel provider to the incentive offered for the same measure through Xcel Energy’s natural gas EFS programming. If the incumbent’s incentive is lower than Xcel Energy’s, the Company will use electric EFS dollars to make up the difference, increasing the total rebate paid to the customer.²

Rebates issued under the Geographic Consistency policy are separate from and additional to any electric energy-efficiency rebate (e.g., if the installed measure is more efficient than a baseline measure, there may be electric savings for which the Company issues a rebate. The most common instance of this is cooling savings from air-source heat pumps, which tend to be more efficient than traditional air conditioners.) “Separate” in this context means that any electric EFS rebate issued under the Geographic Consistency policy is calculated separately from any electric energy efficiency rebate and is paid for out of the programs Electric EFS Budget.

¹ Xcel Energy’s *2024-2026 ECO Triennial Plan*, filed June 29, 2023 in Docket No. E,G002/CIP-23-92, p. 207. The *Plan* was approved by the Deputy Commissioner of Commerce on December 1, 2023.

² *Ibid.*

As noted in Xcel Energy's Triennial Plan, the Company does not currently claim any energy savings in association with rebates issued under the Geographic Consistency policy.

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Xcel Energy Information Request No. 3

Docket No.: E002/M-25-50

Response To: Minnesota Public Utilities Commission

Requestor: Danielle Winner

Date Received: September 15, 2025

Question:

Please provide the number and dollar amount in geographic consistency rebates provided to CenterPoint Energy gas customers in 2024:

- In total
- Due to CenterPoint Energy rejecting the rebate because the AHRI rating did not include a furnace
- For ductless ASHPs
- For cold climate ASHPs

Response:

While we do not have direct visibility into which gas utility serves our electric-only customers, we can identify rebate recipients who reside in communities publicly listed on CenterPoint Energy’s website as being within their service territory. To estimate the number and dollar amounts of geographic consistency rebates provided to CenterPoint Energy gas customers in 2024, we assumed that CenterPoint Energy is the gas utility for those customers identified as within their service territory. This method provides a reasonable proxy for estimating rebate activity associated with CenterPoint Energy gas customers.

Based on this analysis, the Company provides the following for geographic consistency rebates:

**Table 1: Geographic Consistency Rebates
Provided to CenterPoint Energy Gas Customers in 2024**

	# of Measures	Rebates
Total Rebates	2,709	\$2,834,900
Ductless ASHPs (mini-splits)	240	\$264,000
Ductless Cold Climate ASHPs	757	\$1,135,500
Ducted ASHPs	460	\$275,900
Ducted Cold Climate ASHPs	1,252	\$1,159,500

Additionally, 25 measures totaling \$12,500 were rebated to customers after CenterPoint Energy rejected the rebate due to the AHRI rating not including a furnace. We identified these through affidavits from customers and/or trade partners.

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Xcel Energy Information Request No. 4
Docket No.: E002/M-25-50
Response To: Minnesota Public Utilities Commission
Requestor: Danielle Winner
Date Received: September 15, 2025

Question:

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.

Response:

As discussed in Efficient Fuel Switching segment write up of the Company's 2024 consolidated filing¹, the Company included the Geographic Consistency costs in its Cost-Effectiveness analysis but excluded all electric and natural gas impacts related to these measures. These impacts include the energy and demand impacts, as well as the net benefits associated with these impacts. This is consistent with the expectation set in the Company's 2024-2026 ECO Triennial Plan. For the purposes of incentive calculation, the Company followed Commission's January 25, 2024 Order in E,G-999/CI-08-133. Specifically, the Company included the spending towards calculation of the expenditures cap for the incentive². Additionally, if the Company had included the impacts of the geographic consistency savings in its cost-effectiveness analysis, it would have had to exclude the net benefits from the calculation of its electric incentive.³

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¹ 2024 Status Report and Associated Compliance Filings, Docket No. E,G002/CIP-23-92 (April 1, 2025)

² Order point 3.B in the Commission's January 25, 2024 Order in E,G-999/CI-08-133

³ Order point 3.D in the Commission's January 25, 2024 Order in E,G-999/CI-08-133