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May 2, 2022

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

Kevin Lee
Deputy Commissioner, Division of Energy Resources
Minnesota Department of Commerce
85 Seventh Place East, Suite 280
St. Paul, MN 55101-2198

RE: Natural Gas Conservation Improvement Program 2021 Status Report & Associated
Compliance Filings
Docket No. G-008/CI-10-111
Docket No. G-008/CIP-20-478
Docket No. G-008/M-22-____

Dear Executive Secretary and Deputy Commissioner:

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, ("CenterPoint Energy" or the "Company") respectfully submits to the Minnesota Public Utilities Commission ("Commission") and the Minnesota Department of Commerce, Division of Energy Resources ("Department"), its aggregated compliance filing, which includes its *2021 Conservation Improvement Program Status Report; 2021 Demand-Side Management Financial Incentive Report; Conservation Improvement Program Tracker Report* for the period of January 1, 2021 through December 31, 2021; and its request to increase the Conservation Cost Recovery Adjustment ("CCRA") to 0.0905 per dekatherm ("Dth"), to become effective October 1, 2022. This filing complies with the Commission's Orders in *In the Matter of the Commission Review of Utility Performance Incentives for Energy Conservation*,¹ Conservation Improvement Program ("CIP") regulations requiring CenterPoint Energy to submit an annual CIP Status report,² and

¹ Docket No. E,G-999/CI-08-133.

² Minn. R. § 7690.0550.

the Commission's requirement that CenterPoint Energy submit its CIP Adjustment filing annually in conjunction with its CIP Tracker Report and DSM Financial Incentive filing.³

For the thirteenth consecutive year, CenterPoint Energy has surpassed its energy savings goals. The Company achieved 1,871,509 Dth of first-year energy savings, representing 1.26 percent of its average retail sales and 102 percent of its approved goal for 2021. Program expenditures were \$38,439,620 or 106 percent of the approved 2021 budget. Under the mechanism approved by the Commission,⁴ this level of performance qualifies the Company for a financial incentive of \$7,771,520.

CenterPoint Energy was assessed by the Department of Commerce a total of \$608,852 under Minnesota Statute § 216B.241. These assessments are recoverable under Minnesota Statute § 216B.241 through the CIP Tracker mechanism. Combining total assessments, alternative CIP expenditures in 2021 (\$520,959), and 2021 program expenditures results in total deferred expenses on the CIP Tracker account of \$39,569,431. The Company also requests approval of its 2021 CIP carrying charges. Because the Company's 2021 CIP Tracker account was over-recovered for most of the year, total annual carrying charges accrued in favor of customers. The carrying charges were credited to the CIP Tracker account, reducing the total year-end under-recovered balance. Total annual carrying charges of \$84,994 were credited to the 2021 CIP Tracker account, resulting in a year-end, over-recovered CIP Tracker balance of \$11,164,791.

The Commission has ordered CenterPoint Energy to file its CIP Adjustment with its annual CIP Tracker and DSM Financial Incentive filings.⁵ The Company requests approval to increase the CCRA to 0.0905 per Dth, to go into effect on October 1, 2022. The Company projects this increased CCRA will achieve a near-zero CIP Tracker balance by the end of 2023. Section 4 of this filing describes the Company's CCRA proposal in more detail.

CenterPoint Energy has designated selected information in Exhibit B of this document as trade secret. The information meets the definition of trade secret in Minn. Stat. § 13.37, subd. 1(b), as follows: (1) the information was supplied by CenterPoint Energy, the affected organization; (2) CenterPoint Energy has taken all reasonable efforts to maintain the secrecy of the information, including protecting it from disclosure in this document; and (3) the protected information contains monthly customer energy use data, including names and prices, which derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use.

³ *In the Matter of a Petition by CenterPoint Energy, A Division of CenterPoint Energy Resources Corp., for Approval of its 2009 CIP Tracker Account and DSM Financial Incentive*, Docket No. G-008/M-10-416, G-008/M-10-634, Ordering Point 4 (Oct. 11, 2010).

⁴ *In the Matter of Commission Review of Utility Performance Incentives for Energy Conservation Pursuant to Minn. Stat. § 216B.241, Subd. 2c*, Docket No. E,G-999/CI-08-133, Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan (Dec. 9, 2020).

⁵ *In the Matter of a Petition by CenterPoint Energy, A Division of CenterPoint Energy Resources Corp., for Approval of its 2009 CIP Tracker Account and DSM financial incentive*, Docket No. G-008/M-10-416, G-008/M-10-634, Ordering Point 4 (Oct. 11, 2010).

Please address requests to receive a copy of the filing, as well as comments or questions regarding the Status Report, to Ethan Warner at Ethan.Warner@centerpointenergy.com or (612) 321-4324.

Sincerely,

/s/ Ethan S. Warner

Ethan Warner
Regulatory Manager, Conservation Improvement Program

CC: Service List

CENTERPOINT ENERGY
SUMMARY OF FILING
Rule 7829.1300, Subp. 1

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, (“CenterPoint Energy” or the “Company”) submits its *2021 Conservation Improvement Program Status Report* and associated filings. In addition to the Status Report, this filing includes a request for approval of the Company’s December 31, 2021 Conservation Improvement Program (“CIP”) Tracker over-recovered balance of \$11,164,791; a request for approval of a 2021 CIP Financial Incentive in the amount of \$7,771,520 (to be credited to the CIP Tracker account upon receipt of approval from the Minnesota Public Utilities Commission); and a request for approval of updates to the Company’s tariff book to incorporate the requested Conservation Cost Recovery Adjustment factor of \$0.00905 per therm.

CENTERPOINT ENERGY
SUMMARY OF FILING
Rule 7829.1300, Subp. 3

- A. The name, address, and telephone number of the utility:

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas,
a Delaware Corporation
505 Nicollet Mall
PO Box 59038
Minneapolis, Minnesota 55402
(612) 321-4324

- B. The name, address, and telephone number of the attorney for the utility:

Brenda Bjorklund, Associate General Counsel
505 Nicollet Mall
Minneapolis, Minnesota 55402
(612) 321-4976

- C. The date of the filing and the date the proposed rate or service change will take effect:

Date Filed:	May 2, 2022
Effective Dates:	October 1, 2022 (Conservation Cost Recovery Adjustment) Upon receipt of Commission approval (Financial Incentive)

- D. The statute the utility believes control the timeframe for processing the filing:

CenterPoint Energy is unaware of any statute or rule that controls the time frame for processing this filing.

- E. The signature and title of the utility employee responsible for this filing:

/s/
Ethan Warner
Regulatory Manager, Conservation Improvement Program
(612) 321-4324

AGGREGATED COMPLIANCE REPORTS OVERVIEW

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, (“CenterPoint Energy” or the “Company”) submits its *2021 Conservation Improvement Program Status Report* and associated compliance reports. The purpose of the filing is to report 2021 Conservation Improvement Program (“CIP”) project activity, to request approval to allocate the 2021 Financial Incentive to CenterPoint Energy’s CIP Tracker, to update CIP Tracker activity from January 1, 2021 through December 31, 2021, to request approval of the CIP Tracker balance, and to request approval of the Company’s proposed Conservation Cost Recovery Adjustment.

This filing is an aggregation of four compliance reports. The filing is divided into five sections consisting of the following compliance reports and their corresponding attachments:

- Section 1. 2021 Conservation Improvement Program Status Report;
- Section 2. 2021 Demand-Side Management Financial Incentive Report;
- Section 3. Conservation Improvement Program Tracker Report;
- Section 4. Conservation Cost Recovery Adjustment Proposal; and
- Section 5. Attachments.

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SECTION 1: 2021 CONSERVATION IMPROVEMENT PROGRAM

STATUS REPORT

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, (“CenterPoint Energy” or the “Company”) submits this Status Report on its Conservation Improvement Program (“CIP”) in compliance with Minnesota Department of Commerce (“Department”) Rules and the Commissioner’s Decisions. This report covers the 2021 CIP year, January 1 through December 31. The report is divided into five sections:

- I. Summary of Accomplishments
- II. Minority and Women Business Enterprise Vendors
- III. Update of Program Modifications
- IV. Compliance Overview
- V. 2021 CIP Results

Summary of Accomplishments

CenterPoint Energy's commitment to helping its customers achieve cost-effective energy conservation is the driving force behind the Company's successful 2021 CIP performance, despite the unique challenges presented by the continued COVID-19 pandemic. The long-term effects of COVID-19 extended into 2021, and the Company continued to adapt CIP services to the circumstances in order to help customers with their energy efficiency needs.

In 2021, CenterPoint Energy began implementing the *2021-2023 Triennial Plan* which included new innovative programs and services for delivering energy efficiency to its customers.⁶ The Company continued to achieve a record of thirteen consecutive years of surpassing its energy savings goals. 2021 energy savings represent 1.26 percent of CenterPoint Energy's average retail sales, by achieving 1,871,520 Dth first-year energy savings, which is 2 percent above goal. To achieve these energy savings, 2021 CIP program expenditures were \$38,439,602 or 6 percent above the approved budget. Overall, the cost per Dth of first-year energy savings was \$20.54 as compared to the planned \$19.83, which is only 3.6 percent less cost-effective than planned. When lifetime savings are considered, the Company calculates the average per Dth program cost is \$1.62.

The Company exceeded its energy savings goal in the Residential Segment, but fell a bit short of the energy savings goal in the Commercial & Industrial ("C&I") Segment. In 2021, many C&I customers were particularly cautious about investing in capital projects in 2021 given the ongoing pandemic as well as related supply chain and labor constraints. The overall CIP portfolio, as well as the Residential and C&I Segments, was cost effective from the utility, societal, and participant perspectives.

Several programs performed especially well in the residential and commercial segments. For the residential segment, the Company had the highest energy savings to date in the High-Efficiency Home Project at 138,219 Dth or 214 percent above goal, in part related to higher participation than expected and higher energy savings achievements per project. The Company raised rebates in 2021-2023 for achieving higher tiers of whole building energy savings. The New Home Construction Rebates program also achieved 158 percent of its energy savings goal. Despite an increase in goals for the 2021-2023 Triennial Plan, the Home Insulation Rebates program achieved 152 percent of the energy savings goal. For the C&I segment, Audit services has a relatively small energy savings goal, but it also continues to significantly exceed the goal – by 487 percent in 2021. Changes to these services in the 2021-2023 Triennial to streamline the customer experience helped increase participation in Natural Gas Energy Analysis and steam trap audits services. 2021 was the first year of the Building Operator

⁶ *In the Matter of CenterPoint Energy's 2021-2023 Natural Gas Conservation Improvement Program Triennial Plan*, Docket No. G-008/CIP-20-478, Compliance Filing (Jan. 20, 2021).

Certification (“BOC”) rebate.⁷ Energy savings were 392 percent of plan due to higher than expected participation, but also higher per participant energy savings.

Minnesota statute requires gas utilities to spend at least 0.4 percent of gross operating revenue (“GOR”) from residential customers on conservation programs that directly serve the needs of low-income customers. The Company spent \$4,278,865 on dedicated low-income CIP programs, or 0.71 percent of its GOR from residential customers. Total portfolio spending for the benefit of CenterPoint Energy’s low-income customers was \$4,854,801 (or 12.6 percent of total CIP spending) and was equivalent to 0.80 percent of GOR from residential customers. For the low-income segment, the Low-Income Multi-Family Housing Rebates program achieved nearly six times its energy savings goal due to high participation, 430 percent of plan.

CenterPoint Energy is proud of its 2021 CIP accomplishments. The Company continues to demonstrate its commitment to helping its customers achieve cost-effective energy savings and contributing to Minnesota’s highly effective natural gas energy efficiency programs as well as helping to keep our customers safe and healthy.⁸

⁷ The BOC training and certification program for building engineers and maintenance personnel is designed to encourage leadership in their fields and identify energy efficient opportunities in their building(s).

⁸ American Council for an Energy Efficient Economy. The 2020 State Energy Efficiency Scorecard, available at <https://www.aceee.org/research-report/u2011> (last visited April 18, 2022).

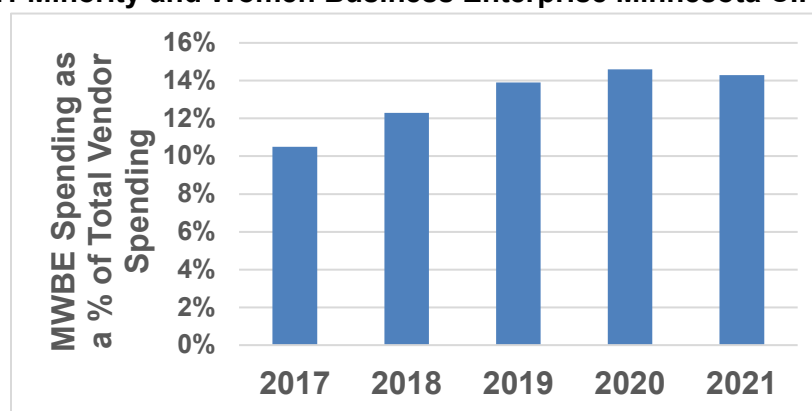
Minority and Women Business Enterprise Vendors

CenterPoint Energy supports efforts to promote diversity in the energy and energy efficiency workforces. The Company recognizes the economic importance of diverse suppliers such as minority-owned and women-owned business enterprises (“MWBE”)⁹ to the Company’s business, to the economies of the states where CenterPoint Energy operates, and to the communities the Company serves. To increase awareness of the importance of diversity and transparency about the businesses that support CenterPoint Energy’s Minnesota CIP, the Company provides the following information about the diversity of its CIP vendors.

Total 2021 Minnesota CIP Spend	\$38,439,620
Vendor Spend ¹⁰	\$11,150,520
MWBE Vendor Spend	\$1,593,970
MWBE Spend as Percent of Vendor Spend¹¹	14.3%

Between 2017 and 2021, MWBE spending increased from about 10 percent to almost 15 percent of total vendor spend, with a slight decrease between 2020 and 2021. However, if non-profit entities are excluded from vendor spend in the calculation, vendor spend on MWBEs increased from 25 percent of the Company’s remaining vendor Minnesota CIP spend in 2020 to 28 percent in 2021.

2017-2021 Minority and Women Business Enterprise Minnesota CIP Spending



⁹ CenterPoint Energy defines minority-owned and women-owned business enterprises per the guidelines of the National Minority Supplier Development Council and the Women’s Business Enterprise National Council.

¹⁰ The Company included in “vendor expenses” all CIP expenses made to business entities in return for services. Vendor spending includes, for example, payments to external project implementers and various marketing and advertisement firms CenterPoint Energy contracts with for energy efficiency promotions. Vendor spending does not include such things as customer or trade ally incentives, fees for membership in energy efficiency organizations (e.g., the Midwest Energy Efficiency Alliance), or various small expenses (e.g., business meals) that the Company does not track by vendor.

¹¹ The Company notes that \$5,455,035 or 48.9 percent of its vendor spend goes to non-profit entities; non-profit entities cannot qualify as MWBEs under the definition CenterPoint Energy uses.

Update of Program Modifications

CenterPoint Energy provides the following information regarding the formal and informal modifications to *CenterPoint Energy's Approved 2021 Conservation Improvement Program ("CIP") Triennial Plan* that were made or approved in 2021 or went into effect in 2021.¹²

Formal Modifications

Home Efficiency Rebates and New Home Construction Rebates – Tier 2 Thermostats

On August 2, 2021, the Deputy Commissioner approved CenterPoint Energy's June 1, 2021 request to modify its CIP programs to add tier 2 thermostats (i.e., internet-capable) to the Home Efficiency Rebates and New Home Construction Rebates programs. The Company also received approval to update the rebate for the 83.5 percent efficient boiler from \$250 to \$300 for Home Efficiency Rebates.

Proposed changes to CenterPoint Energy's CIP programs went into effect for January 1, 2021.

Residential Boiler Efficiency and Low-Income Rental Efficiency

On November 1, 2021, the Deputy Commissioner approved CenterPoint Energy's September 1, 2021 request to modify its CIP programs to increase the minimum efficiency of the first tier of residential boilers from 83.5 percent to 85 percent. Proposed changes for the Home Efficiency Rebates, New Home Construction Rebates, Low-Income Weatherization ("LIW"), Low-Income Rental Efficiency ("LIRE"), and Non-Profit Affordable Housing Rebates ("NPAH") programs begin January 1, 2022.

The Deputy Commissioner also approved CenterPoint Energy's request to modify the eligibility requirements for the LIRE program. The Company specifically proposed modifying LIRE to allow for automatic low-income eligibility for program participation by buildings located in the Minneapolis Green Zones and Areas of Concentrated Poverty.^{13 14} The Company proposed that 1-4 unit rental properties located in the Minneapolis Green Zones do not require renter income verification for LIRE participation starting in 2022, with expansion to Areas of Concentrated Poverty by census tract in 2023. New participation goals, energy savings goals, and budget were proposed for this program in alignment with the eligibility change.

Proposed changes to CenterPoint Energy's CIP programs went into effect for January 1, 2022.

¹² The Deputy Commissioner requires utilities to include in their annual status reports a description of all program modifications and changes not requiring Deputy Commissioner approval in order to keep the Department and other interested parties informed of their activities. *In the Matter of CenterPoint Energy's 2020 Conservation Improvement Program Triennial Plan*, Docket No. G-008/CIP-20-479, *et al.*, Deputy Commissioner Decision, p. 54 (Nov. 25, 2020). In this section, CenterPoint Energy also describes any modifications requiring Deputy Commissioner approval.

¹³ Areas of Concentrated Poverty are defined as areas where the overall poverty rate is over 40 percent.

¹⁴ [Green Zones Initiative - City of Minneapolis \(minneapolismn.gov\)](https://www.minneapolis.gov/green-zones-initiative)

Compliance with Low-Income Minimum Spending Requirements, Addressing Health, Safety, and Structural Pre-Weatherization Measures, and Low-Income Weatherization

On January 31, 2022, the Deputy Commissioner approved CenterPoint Energy's November 1, 2021 request to modify its CIP programs to comply with new low-income minimum spending requirements from the Energy Conservation Optimization ("ECO") Act.¹⁵ The Company's plan to meet the new low-income requirements in 2022-2023 included the following components:

- Adding budget for health, safety, and structural pre-weatherization measures in 2022-2023 for LIW, LIRE, and NPAH programs
- Modifying low-income eligibility requirements (i.e., geographic based low-income eligibility) for the Low-Income Weatherization program, increasing program participation goals, and increasing the program budget
- Providing \$100,000 to the state Healthy Asbestos Insulation Removal account in 2022 and 2023
- Incorporating low-income spending through hybrid commercial and industrial ("C&I") programs for 2022-2023 into the plan¹⁶

Proposed changes to CenterPoint Energy's CIP programs went into effect immediately after approval as the Company proposed an implementation date of January 1, 2022.

Modifications Not Requiring Formal Approval

Home Insulation Rebates – Rebate Structure

CenterPoint Energy provided a Courtesy Notification to the Department on October 6, 2021, describing adjustments to the air sealing and insulation rebate amounts for the Home Insulation Rebates program. Rebates were capped at the lesser of a flat rebate amount or 30 percent of costs. The Company changed rebates to just be based on flat rebate amounts for 2022.¹⁷

This change was intended to help Rebate Eligible Installers ("REI") estimate and communicate expected rebate amounts to customers. REIs identified the 30 percent of cost rebate calculation as a barrier to participating in CenterPoint Energy's Instant Rebate offering, where the customer authorizes the REI to collect the rebate check in return for an upfront cost reduction in the amount of the rebate. Some REIs are not in the practice of or comfortable calculating the rebate amount and were concerned about the risk of non-payment and customer dissatisfaction if they miscalculated the rebate amount. Offering flat rebate amounts clarified Home Insulation Rebates project expectations for REIs and customers.

¹⁵ Minn. Stat. § 216B.241, subd. 7a. Beginning January 1, 2022, a public utility furnishing gas service must spend at least one percent of its most recent three-year average gross operating revenue from residential customers in the state on low-income programs

¹⁶ See definition and requirements for hybrid programs: *In the Matter of CenterPoint energy's 2021-2023 Natural Gas Conservation Improvement Program Triennial Plan*, Docket No. G-008/CIP-20-478, Decision, pp. 10-11 (Nov. 25, 2020).

¹⁷ Rebate amounts were \$500 for wall insulation, \$300 for air sealing (alone), \$500 for attic insulation + air sealing, and \$100 for rim joist insulation.

High Efficiency Homes – Home Model Updates

In 2021, there were two sets of changes to home modeling for the High-Efficiency Home (“HEH”) program. HEH incentivizes builders to achieve increasing levels of energy efficiency above Minnesota Residential Building Code by utilizing the standards and software approved by RESNET, a recognized, national standards-making body for building energy efficiency rating and certification systems in the United States.

CenterPoint Energy provided a Courtesy Notification to the Department on October 6, 2021, that the modeling software used to rate homes in the HEH program was updated. New ANSI/RESNET standards (301-2019) were approved with a deadline for implementing the changes in the modeling in 2021. The plan was for CenterPoint Energy to have Home Energy Use Raters implement the new standards for the HEH program modeling starting on January 1, 2022. Examples of changes to the modeling include appliances updated to meet new federal minimum equipment standards and water heaters with updated internal gains calculations.

CenterPoint Energy provided a Courtesy Notification to the Department on October 23, 2021, about a change to HEH rate modeling to include a correction factor for townhomes as part of RESNET’s newest set of guidelines to be implemented in the modeling software (e.g., Ekotrope) used by Home Energy Use Raters. The adjustment reduces the infiltration (blower door) number by the percentage of walls that are shared in a townhome so long as the home meets certain tightness requirements (usually by about 25% because townhomes share one or two of their six sides with another unit).

Bonus Commercial and Industrial Rebates Due to COVID-19

CenterPoint Energy provided a Courtesy Notification to the Department on March 3, 2021, describing modifications to Commercial Foodservice Equipment Rebates and C&I Heating and Water Heating Rebates. The Commercial Foodservice Equipment Rebates program provides financial incentives for high-efficiency natural gas foodservice equipment, while the C&I Heating and Water Heating Rebates program provides financial incentives for high-efficiency natural gas and water heating equipment for C&I customers.

Because of COVID-19 in 2020 and 2021, CenterPoint Energy modified Commercial Foodservice Rebates and C&I Heating and Water Heating Rebates with limited-time bonuses for all eligible customers.

Low-Income Free Heating System Tune-Up – LIHEAP Communication

The Low-Income Free Heating System Tune-Up program (marketed as Stay Safe Stay Warm [“SSSW”]) provides free furnace or boiler tune-ups and safety check services to residential, low-income customers residing in properties of 4 units or less. CenterPoint Energy provided a Courtesy Notification to the Department on March 12, 2021, describing SSSW outreach and promotional efforts to Low-Income Home Energy Assistance Program (“LIHEAP”) recipients. The outreach and promotional efforts, in April 2021 through June 2021, highlighted the no-cost tune-up services of the SSSW program and involved direct outreach to LIHEAP recipients.

REBUILD Bonus Rebates

CenterPoint Energy launched REBUILD to help Minneapolis-area businesses and property owners recover from property damage that occurred during 2020's civil unrest. Customers affected by the civil unrest that enrolled in REBUILD could apply for triple the standard rebate amount for high-efficiency natural gas equipment, and customer co-payments associated with programs providing direct services to customers, such as NGEA services, were waived as part of the promotion. For new construction or major renovations, the Company worked with customers to maximize rebates within the existing structure of current programs.

The Company also worked with the City of Brooklyn Center after more than 140 businesses experienced damage during the civil unrest following the killing of Daunte Wright on April 11, 2021. CenterPoint Energy provided a Courtesy Notification to the Department on June 17, 2021, to extend the REBUILD deadline to ensure that customers affected in Brooklyn Center received the same support as Minneapolis-area businesses and property owners who experienced civil unrest in 2020. The deadline to purchase and install qualifying equipment and apply for a triple rebate through REBUILD was extended from December 31, 2021 to July 1, 2022 with application period ending on December 31, 2021.

Commercial Code Compliance Support – Evaluation and Quality Assurance

CenterPoint Energy provided a courtesy notification to the Department on May 20, 2021, describing updates to the Commercial Code Compliance Support program. CenterPoint Energy and Xcel Energy planned for the program implementer, rather than the evaluator, to determine the components of an initial evaluation plan (e.g., the data collection for each project).

Regarding Quality Assurance ("QA"), on-site post construction QA would be completed for approximately 5 to 10 percent of projects, while some QA support would be provided to all projects. Program implementer staff would review materials, compile data, and draft the report of recommendations, with QA performed by an implementer engineer. Implementer engineers would also complete the review and report development for more complicated projects and those utilizing the performance path for code compliance.

CenterPoint Energy did not have any Commercial Code Compliance Support projects in 2021.

Energy Assistance Program – Eligibility Guidelines

The Energy Assistance Program ("EAP") helps income-eligible households pay their energy bills. In 2021, EAP updated its income eligibility guidelines, requiring participating households to have incomes either below 60 percent of state median income (previously 50 percent of state median income) or 200 percent of the federal poverty income guidelines, whichever is higher. For households of 9 or more, the income limits effectively remained the same because 200 percent of the federal poverty guidelines was higher than 60 percent of state median income for these households.

CenterPoint's 2021-2023 Triennial Plan states that for many of our low-income programs, including LIW, LIRE, and SSSW, "Eligible households must have incomes either below 50

percent of state median income or 200 percent of the federal poverty income guidelines, whichever is higher". CenterPoint Energy also has one Market Rate Program that follows these guidelines: Home Energy Squad ("HES"). CenterPoint Energy provided a courtesy notification to the Department on April 20, 2021, to change eligibility to be "below 60 percent of state income or 200 percent of the federal poverty income guidelines" to be in alignment with the new federal government standards in order to align with EAP guidelines.

With the recently passed ECO Act, CIP now defines a low-income household as "a household whose household income is 60 percent or less of the state median household income."¹⁸

Energy Assistance – One-Stop

In 2021, CenterPoint Energy received a proposal related to the Center for Energy and Environment's ("CEE") alternative CIP: One-Stop Efficiency Shop HVAC program ("One-Stop"). CenterPoint Energy provided a courtesy notification to the Department on December 6, 2021, that the Company was pursuing an approach to reimburse the One-Stop program and claim gas energy savings for gas measures through existing CIP programs. CenterPoint Energy received general guidance that it could work with alternative CIPs.

CenterPoint Energy used the following procedure to implement gas savings from CEE's One-Stop program:¹⁹

- These projects were treated as engineering assistance rebates with documentation of influenced savings through a custom rebate form.
- An up-front engineering assistance rebate was issued to CEE.
- Program participation was reported in this CIP Status Report.
- Projects met the following program requirements:
 - A study was provided to the customer and the Company for each project.
 - Energy savings calculations were linked to a site-specific CEE energy model. This model was previously reviewed by the Department.
 - Customers were informed that an engineering assistance rebate was being claimed by CEE for the study.
 - Customers received a thorough customer report with recommendations to encourage future energy efficiency measures.
 - Each project documented within the custom rebate form was counted as a participant.

¹⁸ Minn. Stat. § 216B.2402, subd. 16. "Low-income household" means a household whose household income is 60 percent or less of the state median household income.

¹⁹ This approach was in alignment with other third parties that might have approached us with similar projects. A more streamlined approach will be developed for the next triennial.

Compliance Overview

During the 2021 program year, CenterPoint Energy identified an issue with the three-year average gross annual retail energy sales filed in the *2021-2023 Triennial Plan* (“*Triennial Plan*”).²⁰ Sales volumes to CIP Exempt customers in 2019 were incorrectly documented and reported, resulting in a difference between reported sales to CIP Exempt Customers and actual sales to CIP Exempt Customers of about 1.5 million Dth. The Company notified the Department of Commerce about this issue on August 2, 2021, and October 27, 2021. As part of that later notification, the effect on the Company’s compliance criteria was determined to be minimal in discussions with the Department of Commerce. The details about the source of this issue can be found in Section 3 of this report.

The table below summarizes the as filed *Triennial Plan* calculation of average annual retail energy sales of 149,038,242 Dth alongside the corrected average annual retail energy sales of 148,546,443 Dth used in the following sections.

Correction to Three-Year Average Gross Annual Retail Energy Sales

		As Filed	Correction
Total Weather-Normalized Energy Sales (Dth)	2017	184,514,800	184,514,800
	2018	189,773,000	189,773,000
	2019	196,753,100	196,753,100
Sales to CIP Exempt Customers (Dth)	2017	39,741,677	39,741,677
	2018	41,745,976	41,745,976
	2019	42,438,522	43,913,919
Net Weather-Normalized Energy Sales (Dth) (Total Sales Less Sales to Exempt Customers)	2017	144,773,124	144,773,124
	2018	148,027,024	148,027,024
	2019	154,314,578	152,839,181
Average Weather-Normalized Energy Sales		149,038,242	148,546,443

This issue had even smaller effects on Table 2: Compliance with Minimum Spending Requirement and Table 4: Compliance with Research and Development (“R&D”) Spending Cap as reported below.

In the compliance sections below, the Company reports compliance with requirements in effect beginning January 1, 2022. The 92nd Minnesota Legislature (2021-2022) recently passed the Energy Conservation and Optimization (“ECO”) Act of 2021, which removed the minimum spending requirements for the Company’s Minnesota CIP and changed the R&D spending cap.

²⁰ *In the Matter of CenterPoint Energy’s Approved 2021-2023 Conservation Improvement Triennial Plan*, Docket No. G-008/CIP-20-478, (Jan. 20, 2021).

Energy Savings Goals (2020 Minn. Stat. § 216B.241, subd. 1c)

CenterPoint Energy's approved 2021 energy savings goal represents 1.23 percent of the Company's revised three-year average gross annual retail energy sales.²¹ The Company surpassed the approved 2021 energy savings goal by 40,071 Dth, achieving energy savings equivalent to 1.26 percent of CenterPoint Energy's approved three-year-averaged weather-normalized energy sales excluding energy sales to CIP-exempt customers. The table below illustrates that the correction to the annual retail energy sales had little effect on the calculation of the energy savings achievements as a percent of the annual retail energy sales.

Table 1. Compliance with Annual Energy Savings Goal

	As Filed	Correction
Average Weather-Normalized Energy Sales (2017-2019)	149,038,242 Dth	148,546,443 Dth
2021 Energy Savings Goal	1,831,520 Dth	1,831,520 Dth
2021 CIP Energy Savings Goal - Percent of Average Weather-Normalized Energy Sales	1.23%	1.23%
2021 Actual Energy Savings	1,871,483 Dth	1,871,483 Dth
2021 CIP Energy Savings - Percent of Average Weather-Normalized Energy Sales	1.26%	1.26%

Minimum Spending Requirements (2020 Minn. Stat. § 216B.241, subd. 1a; Minn. R. 7690.1200, subp. 1(A))

2020 Minnesota Statutes § 216B.241, subd. 1a, required gas utilities to spend 0.5 percent of their Gross Operating Revenue ("GOR") according to their *Gas Jurisdictional Annual Report* on CIP; Minnesota Rules § 7690.1200, subp. 1(A)(2), establishes this as the source of data to be used for calculating GOR. In 2021, CenterPoint Energy spent a total of **\$38,439,620** on CIP, which represents 3.89 percent of the Company's approved GOR, excluding sales to CIP exempt customers.

²¹ See Minn. Stat. § 216B.241, subd. 1c(d).

Table 2. Compliance with Minimum Spending Requirement

	As Filed	Correction
2019 Total GOR ²²	\$1,003,085,600	\$1,003,085,600
Revenue from CIP Exempt Customers ²³	\$14,500,043	\$14,866,976
2019 Net GOR ²⁴	\$988,585,557	\$988,218,624
Statutory Spending Factor	0.5%	0.5%
Statutory Minimum CIP Spending	\$4,942,928	\$4,941,093
2021 Program Spending	\$38,439,620	\$38,439,620
2021 Program Spending as a Percent of Net GOR	3.89%	3.89%

With passage of the ECO Act of 2021 the minimum spending requirements will be removed for the 2022 CIP Status Report.

Low-Income Spending Requirement (2020 Minn. Stat. § 216B.241, subd. 7 (version 2020))

2020 Minnesota Statutes § 216B.241, subd. 7, requires each gas utility to annually spend at least 0.4 percent of its most recent three-year-average residential GOR on conservation programs that directly serve the needs of low-income customers. In 2021, CenterPoint Energy spent a total of **\$4,854,801** on low-income customers participating in CIP, representing 0.8 percent of the Company's three-year-average GOR from residential customers.²⁵

²² CenterPoint Energy's 2019 Gas Jurisdictional Report, Page G-39 (Total Revenue Corresponding to Sales).

²³ 2020 Minn. Stat. § 216B.241, subd. 1a states that GOR does not include sales to customers exempt from CIP.

²⁴ As filed from *In the Matter of CenterPoint Energy's Approved 2021-2023 Conservation Improvement Triennial Plan*, Docket No. G-008/CIP-20-478, (Jan. 20, 2021).

²⁵ Consistent with how CIP energy savings goals are calculated for Triennial Plan filings, the Company calculated its three-year average GOR from residential customers using the three most recent years prior to filing *CenterPoint Energy's 2021-2023 Conservation Improvement Program Triennial Plan*. See CenterPoint Energy's Approved 2021-2023 Conservation Improvement Triennial Plan, Docket No. G-008/CIP-20-478, pp. 7 (Jan. 20, 2021). The Company calculated applicable minimum low-income spending amounts using the methodology approved by the Deputy Commissioner in 2015. See *In the Matter of CenterPoint Energy's Conservation Improvement Program 2013 Status Report*, Docket No. G-008/CIP-12-564.02, Deputy Commissioner Decision, Ordering Point 3 (Jan. 9, 2015).

Table 2. Compliance with Low-Income Spending Requirement

2017 GOR from Residential Customers	\$555,857,400
2018 GOR from Residential Customers	\$653,856,200
2019 GOR from Residential Customers	\$601,690,500
2017-2019 Average GOR from Residential Customers ²⁶	\$603,801,367
Statutory Spending Factor	0.40%
Statutory Minimum Low-Income Spending	\$2,415,205
2021 Spending (Dedicated Low-Income Segment)	\$4,278,865
Spending as Percent of Residential GOR (Dedicated Low-Income Programs ONLY)	0.71%
2021 Low-Income Spending in the Multi-Family Building Efficiency (MFBE) Program	\$180,818
2021 Low-Income Spending in the Energy Design Assistance (EDA) Program	\$395,117
2021 Total Low-Income Spending (Dedicated Low-Income Programs, EDA, and MFBE)	\$4,854,801
2021 Low-Income Spending as Percent of Residential GOR (Dedicated Low-Income Programs, EDA, and MFBE)	0.8%
2021 Spending on Low-Income Customers in the Residential Market Segment	\$280,743

R&D Spending Cap (2020 Minn. Stat. § 216B.241, subd. 2(c))

2020 Minnesota Statutes § 216B.241, subd. 2(c) established that the maximum utilities may spend on R&D through CIP should be set at 10 percent of the minimum spending requirement. The table below demonstrates CenterPoint Energy's compliance with the R&D spending cap that existed on January 1, 2021. For descriptions of the Company's 2021 R&D activities, refer to the description of the Analysis, Evaluation, & Project Development project included in the 2021 CIP Results section of this Status Report.

Table 3. Compliance with Research and Development Spending Cap

	As Filed	Corrected
Statutory Minimum CIP Spending	\$4,942,928	\$4,941,093
R&D Spending Cap	\$494,293	\$494,109
2021 Total R&D Spending	\$150,389	\$150,389

With passage of the ECO Act of 2021 the R&D cap for CIP spending changed to reflect that the R&D cap be based on 10 percent of total CIP spending rather than the minimum CIP spending requirement.

²⁶ Annual GOR from residential customers figures come from the Company's 2017-2019 Gas Jurisdictional Annual Reports, Page G-38 (Revenue Corresponding to Sales for Residential With Heating and Residential Without Heating).

Distributed and Renewable Generation Cap (Minn. Stat. § 216B.2411, subd. 1(a))

Minnesota Statutes § 216B.2411, subd. 1(a), allows utilities to spend up to five percent of their minimum annual spending requirements on distributed and renewable generation projects.

CenterPoint Energy did not expend funds on any such projects in 2021.

2021 CIP Results²⁷

The information provided in the following tables satisfies the requirements of Minnesota Rules § 7690.0550.

2021 Program Summary

Summary	Budget	Participation	Energy Saved (Dth)	Demand Energy Saved (Dth)
Residential Market Segment				
2021 Goal	\$18,981,923	270,425	636,282	6,363
2021 Actual	\$22,103,005	268,973	766,879	7,669
Variance	\$3,121,083	(1,452)	130,597	1,306
Low-Income Market Segment				
2021 Goal	\$4,282,482	3,105	23,394	234
2021 Actual	\$4,278,865	2,162	28,619	286
Variance	(\$3,616)	(943)	5,225	52
C&I Market Segment				
2021 Goal	\$10,123,516	10,183	1,171,762	11,718
2021 Actual	\$9,958,337	9,749	1,076,011	10,760
Variance	(\$165,179)	(434)	(95,751)	(958)
Other Projects				
2021 Goal	\$2,922,037	300	0	0
2021 Actual	\$2,099,412	21	0	0
Variance	(\$822,625)	(279)	0	0
Total				
2021 Goal	\$36,309,957	284,013	1,831,438	18,314
2021 Actual	\$38,439,620	280,905	1,871,509	18,715
Variance	\$2,129,663	(3,108)	40,071	401

²⁷ Tables included in this section may not sum to the exact totals provided due to rounding.

2021 Budget Summary

Project	Budget	Actual Spending	Difference	Difference As a % of Budget
Residential Market Segment Projects				
Home Efficiency Rebates	\$9,089,265	\$10,019,395	\$930,130	10.2%
DIY Home Efficiency	\$648,550	\$507,013	(\$141,537)	-21.8%
Home Insulation Rebates	\$1,011,675	\$1,170,701	\$159,026	15.7%
Home Energy Reports	\$1,007,525	\$977,733	(\$29,792)	-3.0%
Home Energy Squad	\$2,411,400	\$1,475,368	(\$936,032)	-38.8%
High-Efficiency Home	\$3,749,800	\$6,924,503	\$3,174,703	84.7%
New Home Construction Rebates	\$702,933	\$683,307	(\$19,625)	-2.8%
School Kits	\$360,775	\$344,985	(\$15,790)	-4.4%
Subtotal:	\$18,981,923	\$22,103,005	\$3,121,083	16.4%
Low-Income Market Segment Projects				
Low-Income Weatherization	\$3,116,100	\$3,475,783	\$359,683	11.5%
Low-Income Rental Efficiency	\$306,100	\$264,752	(\$41,348)	-13.5%
Low-Income Free Heating System Tune-Up	\$161,525	\$57,428	(\$104,097)	-64.4%
Non-Profit Affordable Housing Rebates	\$632,230	\$304,513	(\$327,718)	-51.8%
Low-Income Multi-Family Housing Rebates	\$66,526	\$176,390	\$109,864	165.1%
Subtotal:	\$4,282,482	\$4,278,865	(\$3,616)	-0.1%
C&I Market Segment Projects				
Commercial Foodservice Equipment Rebates	\$700,455	\$579,022	(\$121,433)	-17.3%
C&I Heating and Water Heating Rebates	\$3,521,939	\$3,951,372	\$429,434	12.2%
C&I Custom Rebates	\$1,957,979	\$1,631,351	(\$326,628)	-16.7%
C&I Audit Services	\$474,975	\$431,493	(\$43,482)	-9.2%
Energy Design Assistance	\$1,428,470	\$1,959,363	\$530,892	37.2%
Code Compliance Support	\$56,100	\$22,789	(\$33,311)	-59.4%
Industrial Process & Commercial Efficiency	\$353,251	\$235,474	(\$117,777)	-33.3%
C&I Training and Education	\$135,050	\$100,654	(\$34,396)	-25.5%
Benchmarking Services and Certification Assistance	\$226,150	\$169,451	(\$56,699)	-25.1%
Recommissioning Study and Rebates	\$146,250	\$104,058	(\$42,192)	-28.8%
Multi-Family Building Efficiency	\$1,122,897	\$773,310	(\$349,587)	-31.1%
Subtotal:	\$10,123,516	\$9,958,337	(\$165,179)	-1.6%
Other Projects				
Analysis, Evaluation, & Project Development	\$1,496,400	\$1,058,803	(\$437,597)	-29.2%
Energy Efficiency Marketing & Awareness	\$752,000	\$780,955	\$28,955	3.9%
Planning & Regulatory Affairs	\$198,250	\$145,330	(\$52,920)	-26.7%
EZ Pay On-Bill Loan	\$475,387	\$114,324	(\$361,063)	-76.0%
Subtotal:	\$2,922,037	\$2,099,412	(\$822,625)	-28.2%
Total	\$36,309,957	\$38,439,620	\$2,129,663	5.9%

2021 Energy Savings Summary

Project	Goal Energy Savings (Dth)	Actual Energy Savings (Dth)	Difference	Difference As a % of Goal	Lifetime Energy Savings (Dth)
Residential Market Segment Projects					
Home Efficiency Rebates	351,058	390,088	39,030	11.1%	7,346,633
DIY Home Efficiency	41,285	38,633	(2,652)	-6.4%	391,384
Home Insulation Rebates	23,604	35,815	12,212	51.7%	716,308
Home Energy Reports	95,218	110,839	15,620	16.4%	332,516
Home Energy Squad	27,600	12,634	(14,966)	-54.2%	123,560
High-Efficiency Home	64,568	138,219	73,651	114.1%	2,764,372
New Home Construction Rebates	17,577	27,830	10,253	58.3%	415,469
School Kits	15,371	12,822	(2,549)	-16.6%	121,272
Subtotal:	636,282	766,879	130,597	20.5%	12,211,514
Low-Income Market Segment Projects					
Low-Income Weatherization	14,937	13,125	(1,812)	-12.1%	252,404
Low-Income Rental Efficiency	1,526	1,067	(459)	-30.1%	21,230
Low-Income Free Heating System Tune-Up	2,536	1,344	(1,192)	-47.0%	2,689
Non-Profit Affordable Housing Rebates	2,573	1,583	(990)	-38.5%	29,913
Low-Income Multi-Family Housing Rebates	1,822	11,499	9,677	531.1%	120,579
Subtotal:	23,394	28,619	5,225	22.3%	426,815
C&I Market Segment Projects					
Commercial Foodservice Equipment Rebates	60,527	46,175	(14,352)	-23.7%	576,193
C&I Heating and Water Heating Rebates	742,435	659,124	(83,311)	-11.2%	4,639,691
C&I Custom Rebates	154,496	137,279	(17,217)	-11.1%	1,981,913
C&I Audit Services	6,650	32,389	25,739	387.1%	221,091
Energy Design Assistance	150,651	167,791	17,140	11.4%	3,355,828
Code Compliance Support	2,576	0	(2,576)	-100.0%	0
Industrial Process & Commercial Efficiency	17,240	9,911	(7,329)	-42.5%	128,239
C&I Training and Education	806	3,158	2,352	291.9%	15,792
Benchmarking Services and Certification Assistance	0	0	N/A	N/A	N/A
Recommissioning Study and Rebates	12,500	5,996	(6,504)	-52.0%	41,972
Multi-Family Building Efficiency	23,881	14,187	(9,694)	-40.6%	159,762
Subtotal:	1,171,762	1,076,011	(95,751)	-8.2%	11,120,479
Other Projects					
Analysis, Evaluation, & Project Development	0	0	0	N/A	N/A
Energy Efficiency Marketing & Awareness	0	0	0	N/A	N/A
Planning & Regulatory Affairs	0	0	0	N/A	N/A
EZ Pay On-Bill Loan	0	0	0	N/A	N/A
Subtotal:	0	0	0	N/A	N/A
Total	1,831,438	1,871,509	40,071	2.2%	23,758,808

2021 Demand Savings Summary

Project	Goal Demand Savings(Dth)	Actual Demand Savings (Dth)	Difference	Difference As a % of Goal
Residential Market Segment Projects				
Home Efficiency Rebates	3,511	3,901	390	11.1%
DIY Home Efficiency	413	386	(27)	-6.4%
Home Insulation Rebates	236	358	122	51.7%
Home Energy Reports	952	1,108	156	16.4%
Home Energy Squad	276	126	(150)	-54.2%
High-Efficiency Home	646	1,382	737	114.1%
New Home Construction Rebates	176	278	103	58.3%
School Kits	154	128	(25)	-16.6%
Subtotal:	6,363	7,669	1,306	20.5%
Low-Income Market Segment Projects				
Low-Income Weatherization	149	131	(18)	-12.1%
Low-Income Rental Efficiency	15	11	(5)	-30.1%
Low-Income Free Heating System Tune-Up	25	13	(12)	-47.0%
Non-Profit Affordable Housing Rebates	26	16	(10)	-38.5%
Low-Income Multi-Family Housing Rebates	18	115	97	531.1%
Subtotal:	234	286	52	22.3%
C&I Market Segment Projects				
Commercial Foodservice Equipment Rebates	605	462	(144)	-23.7%
C&I Heating and Water Heating Rebates	7,424	6,591	(833)	-11.2%
C&I Custom Rebates	1,545	1,373	(172)	-11.1%
C&I Audit Services	67	324	257	387.1%
Energy Design Assistance	1,507	1,678	171	11.4%
Code Compliance Support	26	0	(26)	-100.0%
Industrial Process & Commercial Efficiency	172	99	(73)	-42.5%
C&I Training and Education	8	32	24	291.9%
Benchmarking Services and Certification Assistance	0	0	N/A	N/A
Recommissioning Study and Rebates	125	60	(65)	-52.0%
Multi-Family Building Efficiency	239	142	(97)	-40.6%
Subtotal:	11,718	10,760	(958)	-8.2%
Other Projects				
Analysis, Evaluation, & Project Development	0	0	N/A	N/A
Energy Efficiency Marketing & Awareness	0	0	N/A	N/A
Planning & Regulatory Affairs	0	0	N/A	N/A
EZ Pay On-Bill Loan	0	0	N/A	N/A
Subtotal:	0	0	N/A	N/A
Total	18,314	18,715	401	2.2%

2021 Participation Summary

Project	Participation Goal	Actual Participation	Low-Income Participation Estimate	Actual Low-Income Participation
Residential Market Segment Projects				
Home Efficiency Rebates	26,560	32,801	425	387
DIY Home Efficiency	15,300	11,486	826	558
Home Insulation Rebates	1,665	2,034	20	13
Home Energy Reports	200,000	193,665	5,400	5,114
Home Energy Squad	5,500	3,218	319	130
High-Efficiency Home	2,500	4,690	5	10
New Home Construction Rebates	3,900	6,037	8	25
School Kits	15,000	15,042	0	0
Subtotal:	270,425	268,973	7,003	6,237
Low-Income Market Segment Projects				
Low-Income Weatherization	1,279	1,186	1,279	1,186
Low-Income Rental Efficiency	151	71	151	69
Low-Income Free Heating System Tune-Up	1,200	629	1,200	629
Non-Profit Affordable Housing Rebates	465	233	465	233
Low-Income Multi-Family Housing Rebates	10	43	10	43
Subtotal:	3,105	2,162	3,105	2,160
C&I Market Segment Projects				
Commercial Foodservice Equipment Rebates	500	376	0	0
C&I Heating and Water Heating Rebates	7,419	6,725	0	0
C&I Custom Rebates	43	80	0	0
C&I Audit Services	201	325	0	0
Energy Design Assistance	58	67	8	11
Code Compliance Support	17	0	0	0
Industrial Process & Commercial Efficiency	10	11	0	0
C&I Training and Education	1,010	682	0	0
Benchmarking Services and Certification Assistance	595	1,230	0	0
Recommissioning Study and Rebates	25	17	0	0
Multi-Family Building Efficiency	305	236	75	43
Subtotal:	10,183	9,749	83	54
Other Projects				
Analysis, Evaluation, & Project Development	0	0	0	0
Energy Efficiency Marketing & Awareness	0	0	0	0
Planning & Regulatory Affairs	0	0	0	0
EZ Pay On-Bill Loan	300	21	5	0
Subtotal:	300	21	5	0
Total	284,013	280,905	10,195	8,451

The methods used to determine low-income customer participation rates for applicable projects are described in the individual market Segment summaries below.

2021 Low-Income Spending Summary

Project	Total Spending	Estimated Low-Income Spending	Low-Income Spending	Difference As a % of Estimated Spending
Residential Market Segment Projects				
Home Efficiency Rebates	\$10,019,395	\$0	\$147,352	N/A
DIY Home Efficiency	\$507,013	\$0	\$24,631	N/A
Home Insulation Rebates	\$1,170,701	\$0	\$7,037	N/A
Home Energy Reports	\$977,733	\$0	\$25,818	N/A
Home Energy Squad	\$1,475,368	\$0	\$59,602	N/A
High-Efficiency Home	\$6,924,503	\$0	\$13,242	N/A
New Home Construction Rebates	\$683,307	\$0	\$3,062	N/A
School Kits	\$344,985	\$0	\$0	N/A
Subtotal:	\$22,103,005	\$0	\$280,743	N/A
Low-Income Market Segment Projects				
Low-Income Weatherization	\$3,475,783	\$3,116,100	\$3,475,783	12%
Low-Income Rental Efficiency	\$264,752	\$306,100	\$264,752	-14%
Low-Income Free Heating System Tune-Up	\$57,428	\$161,525	\$57,428	-64%
Non-Profit Affordable Housing Rebates	\$304,513	\$632,230	\$304,513	-52%
Low-Income Multi-Family Housing Rebates	\$176,390	\$66,526	\$176,390	165%
Subtotal:	\$4,278,865	\$4,282,482	\$4,278,865	0%
C&I Market Segment Projects				
Commercial Foodservice Equipment Rebates	\$579,022	\$0	\$0	N/A
C&I Heating and Water Heating Rebates	\$3,951,372	\$0	\$0	N/A
C&I Custom Rebates	\$1,631,351	\$0	\$0	N/A
C&I Audit Services	\$431,493	\$0	\$0	N/A
Energy Design Assistance	\$1,959,363	\$195,700	\$395,117	20%
Code Compliance Support	\$22,789	\$0	\$0	N/A
Industrial Process & Commercial Efficiency	\$235,474	\$0	\$0	N/A
C&I Training and Education	\$100,654	\$0	\$0	N/A
Benchmarking Services and Certification Assistance	\$169,451	\$0	\$0	N/A
Recommissioning Study and Rebates	\$104,058	\$0	\$0	N/A
Multi-Family Building Efficiency	\$773,310	\$275,110	\$180,818	-34%
Subtotal:	\$9,958,337	\$470,810	\$575,936	22%
Other Projects				
Analysis, Evaluation, & Project Development	\$988,803	\$0	\$0	N/A
Energy Efficiency Marketing & Awareness	\$780,955	\$0	\$0	N/A
Planning & Regulatory Affairs	\$145,330	\$0	\$0	N/A
EZ Pay On-Bill Loan	\$184,324	\$0	\$0	N/A
Subtotal:	\$2,099,412	\$0	\$0	N/A
Total	\$38,439,620	\$4,753,292	\$5,135,545	8%

2021 Low-Income Energy Savings Summary

Project	Goal Energy Savings (Dth)	Actual Energy Savings (Dth)	Estimated Low-Income Energy Savings (Dth)	Actual Low-Income Energy Savings (Dth)
Residential Market Segment Projects				
Home Efficiency Rebates	351,058	390,088	5,968	4,374
DIY Home Efficiency	41,285	38,633	1,858	2,569
Home Insulation Rebates	23,604	35,815	71	259
Home Energy Reports	95,218	110,839	2,952	8,781
Home Energy Squad	27,600	12,634	2,760	553
High-Efficiency Home	64,568	138,219	0	317
New Home Construction Rebates	17,577	27,830	0	130
School Kits	15,371	12,822	0	0
Subtotal:	636,282	766,879	13,608	16,983
Low-Income Market Segment Projects				
Low-Income Weatherization	14,937	13,125	14,937	13,125
Low-Income Rental Efficiency	1,526	1,067	1,526	1,067
Low-Income Free Heating System Tune-Up	2,536	1,344	2,536	1,344
Non-Profit Affordable Housing Rebates	2,573	1,583	2,573	1,583
Low-Income Multi-Family Housing Rebates	1,822	11,499	1,822	11,499
Subtotal:	23,394	28,619	23,394	28,619
C&I Market Segment Projects				
Commercial Foodservice Equipment Rebates	60,527	46,175	0	0
C&I Heating and Water Heating Rebates	742,435	659,124	0	0
C&I Custom Rebates	154,496	137,279	0	0
C&I Audit Services	6,650	32,389	0	0
Energy Design Assistance	150,651	167,791	20,639	28,589
Code Compliance Support	2,576	0	0	0
Industrial Process & Commercial Efficiency	17,240	9,911	0	0
C&I Training and Education	806	3,158	0	0
Benchmarking Services and Certification Assistance	0	0	0	0
Recommissioning Study and Rebates	12,500	5,996	0	0
Multi-Family Building Efficiency	23,881	14,187	5,851	4,999
Subtotal:	1,171,762	1,076,011	26,490	33,588
Other Projects				
Analysis, Evaluation, & Project Development	0	0	0	0
Energy Efficiency Marketing & Awareness	0	0	0	0
Planning & Regulatory Affairs	0	0	0	0
EZ Pay On-Bill Loan	0	0	0	0
Subtotal:	0	0	0	0
Total	1,831,438	1,871,509	63,492	79,190

2021 Renter Participation Summary

Project	Participation Goal	Actual Participation	Renter Participation Estimate	Actual Renter Participation
Residential Market Segment Projects				
Home Efficiency Rebates	26,560	32,801	1,833	1,806
DIY Home Efficiency	15,300	11,486	2,142	1,150
Home Insulation Rebates	1,665	2,034	118	134
Home Energy Reports	200,000	193,665	7,400	6,920
Home Energy Squad	5,500	3,218	671	260
High-Efficiency Home	2,500	4,690	15	17
New Home Construction Rebates	3,900	6,037	94	74
School Kits	15,000	15,042	-	-
Subtotal:	270,425	268,973	12,272	10,361
Low-Income Market Segment Projects				
Low-Income Weatherization	1,279	1,186	128	67
Low-Income Rental Efficiency	151	71	151	69
Low-Income Free Heating System Tune-Up	1,200	629	26	30
Non-Profit Affordable Housing Rebates	465	233	23	-
Low-Income Multi-Family Housing Rebates	10	43	10	43
Subtotal:	3,105	2,162	339	209
C&I Market Segment Projects				
Commercial Foodservice Equipment Rebates	500	376	-	20
C&I Heating and Water Heating Rebates	7,419	6,725	-	1,527
C&I Custom Rebates	43	80	-	-
C&I Audit Services	201	325	-	7
Energy Design Assistance	58	67	33	52
Code Compliance Support	17	0	-	-
Industrial Process & Commercial Efficiency	10	11	-	-
C&I Training and Education	1,010	682	-	-
Benchmarking Services and Certification Assistance	595	1,230	-	-
Recommissioning Study and Rebates	25	17	-	-
Multi-Family Building Efficiency	305	236	305	236
Subtotal:	10,183	9,749	338	1,842
Other Projects				
Analysis, Evaluation, & Project Development	0	0	-	-
Energy Efficiency Marketing & Awareness	0	0	-	-
Planning & Regulatory Affairs	0	0	-	-
EZ Pay On-Bill Loan	300	21	-	-
Subtotal:	300	21	-	-
Total	284,013	280,905	12,949	12,412

The methods used to determine renter participation rates for applicable projects are described in the individual Market Segment summaries below.

2021 Cost-Benefit Analyses

Project	Ratepayer Impact Test	Utility Cost Test	Societal Test	Participant Test
Residential Market Segment Projects				
Home Efficiency Rebates	0.59	3.25	2.43	3.10
DIY Home Efficiency	0.60	3.78	5.96	N/A
Home Insulation Rebates	0.57	2.68	1.10	1.38
Home Energy Reports	0.49	1.59	2.31	N/A
Home Energy Squad	0.25	0.39	0.56	6.68
High-Efficiency Home	0.51	1.75	2.44	3.82
New Home Construction Rebates	0.57	2.72	2.06	2.71
School Kits	0.50	1.68	2.63	N/A
Subtotal:	0.56	2.61	2.26	3.18
Low-Income Market Segment Projects				
Low-Income Weatherization	0.23	0.33	0.56	N/A
Low-Income Rental Efficiency	0.24	0.35	0.41	1.34
Low-Income Free Heating System Tune-Up	0.17	0.22	0.32	N/A
Non-Profit Affordable Housing Rebates	0.27	0.43	0.85	2.19
Low-Income Multi-Family Housing Rebates	0.58	3.24	2.48	3.20
Subtotal:	0.28	0.45	0.69	5.26
C&I Market Segment Projects				
Commercial Foodservice Equipment Rebates	0.62	4.65	2.55	3.17
C&I Heating and Water Heating Rebates	0.65	6.08	4.63	5.97
C&I Custom Rebates	0.82	5.62	2.91	2.87
C&I Audit Services	0.59	2.40	3.03	12.45
Energy Design Assistance	0.64	7.50	1.70	1.99
Code Compliance Support	N/A	N/A	N/A	N/A
Industrial Process & Commercial Efficiency	0.73	2.45	1.67	1.87
C&I Training and Education	0.37	0.72	1.00	7.50
Benchmarking Services and Certification Assistance	N/A	N/A	N/A	N/A
Recommissioning Study and Rebates	0.54	1.84	0.71	0.90
Multi-Family Building Efficiency	0.41	0.99	1.02	2.66
Subtotal:	0.64	5.36	2.59	3.22
Other Projects				
Analysis, Evaluation, & Project Development	N/A	N/A	N/A	N/A
Energy Efficiency Marketing & Awareness	N/A	N/A	N/A	N/A
Planning & Regulatory Affairs	N/A	N/A	N/A	N/A
EZ Pay On-Bill Loan	N/A	N/A	N/A	N/A
Subtotal:	N/A	N/A	N/A	N/A
Total	0.58	2.94	2.24	3.23

2021 Cost per Dth Saved Comparison

Project	Approved Cost per Dth Saved	Actual Cost per Dth Saved	Difference As a % of Approved Cost per Dth
Residential Market Segment Projects			
Home Efficiency Rebates	\$25.89	\$25.68	-0.8%
DIY Home Efficiency	\$15.71	\$13.12	-16.5%
Home Insulation Rebates	\$42.86	\$32.69	-23.7%
Home Energy Reports	\$10.58	\$8.82	-16.6%
Home Energy Squad	\$87.37	\$116.78	33.7%
High-Efficiency Home	\$58.08	\$50.10	-13.7%
New Home Construction Rebates	\$39.99	\$24.55	-38.6%
School Kits	\$23.47	\$26.91	14.6%
Subtotal:	\$29.83	\$28.82	-3.4%
Low-Income Market Segment Projects			
Low-Income Weatherization	\$208.62	\$264.82	26.9%
Low-Income Rental Efficiency	\$200.59	\$248.15	23.7%
Low-Income Free Heating System Tune-Up	\$63.69	\$42.72	-32.9%
Non-Profit Affordable Housing Rebates	\$245.72	\$192.33	-21.7%
Low-Income Multi-Family Housing Rebates	\$36.51	\$15.34	-58.0%
Subtotal:	\$183.06	\$149.51	-18.3%
C&I Market Segment Projects			
Commercial Foodservice Equipment Rebates	\$11.57	\$12.54	8.4%
C&I Heating and Water Heating Rebates	\$4.74	\$5.99	26.4%
C&I Custom Rebates	\$12.67	\$11.88	-6.2%
C&I Audit Services	\$71.42	\$13.33	-81.3%
Energy Design Assistance	\$9.48	\$11.68	23.2%
Code Compliance Support	\$21.78	N/A	N/A
Industrial Process & Commercial Efficiency	\$20.49	\$23.76	15.9%
C&I Training and Education	\$167.56	\$31.87	-81.0%
Benchmarking Services and Certification Assistance	N/A	N/A	N/A
Recommissioning Study and Rebates	\$11.70	\$17.35	48.3%
Multi-Family Building Efficiency	\$47.02	\$54.51	15.9%
Subtotal:	\$8.64	\$9.26	7.1%
Other Projects			
Analysis, Evaluation, & Project Development	N/A	N/A	N/A
Energy Efficiency Marketing & Awareness	N/A	N/A	N/A
Planning & Regulatory Affairs	N/A	N/A	N/A
EZ Pay On-Bill Loan	N/A	N/A	N/A
Subtotal:	N/A	N/A	N/A
Total	\$19.83	\$20.54	3.6%

2021 LIHEAP and GAP Participation Summary

Project	Participation Goal	Actual Participation	LIHEAP Participants	GAP Participants
Residential Market Segment Projects				
Home Efficiency Rebates	26,560	32,801	387	117
DIY Home Efficiency	15,300	11,486	558	240
Home Insulation Rebates	1,665	2,034	13	1
Home Energy Reports	200,000	193,665	5,114	2,262
Home Energy Squad	5,500	3,218	130	58
High-Efficiency Home	2,500	4,690	10	2
New Home Construction Rebates	3,900	6,037	25	1
School Kits	15,000	15,042	-	-
Subtotal:	270,425	268,973	6,237	2,681
Low-Income Market Segment Projects				
Low-Income Weatherization	1,279	1,186	1,186	173
Low-Income Rental Efficiency	151	71	71	12
Low-Income Free Heating System Tune-Up	1,200	629	629	326
Non-Profit Affordable Housing Rebates	465	233	-	-
Low-Income Multi-Family Housing Rebates	10	43	-	-
Subtotal:	3,105	2,162	1,886	511
C&I Market Segment Projects	0	0		
Commercial Foodservice Equipment Rebates	500	376	-	-
C&I Heating and Water Heating Rebates	7,419	6,725	-	-
C&I Custom Rebates	43	80	-	-
C&I Audit Services	201	325	-	-
Energy Design Assistance	58	67	-	-
Code Compliance Support	17	0	-	-
Industrial Process & Commercial Efficiency	10	11	-	-
C&I Training and Education	1,010	682	-	-
Benchmarking Services and Certification Assistance	595	1,230	-	-
Recommissioning Study and Rebates	25	17	-	-
Multi-Family Building Efficiency	305	236	-	-
Subtotal:	10,183	9,749	0	0
Other Projects				
Analysis, Evaluation, & Project Development	0	0	-	-
Energy Efficiency Marketing & Awareness	0	0	-	-
Planning & Regulatory Affairs	0	0	-	-
EZ Pay On-Bill Loan	300	21	-	-
Subtotal:	300	21	0	0
Total	284,013	280,905	8,123	3,192

On November 5, 2020, the Minnesota Public Utilities Commission ordered CenterPoint Energy to provide the following in the CIP annual status reports: “CenterPoint shall provide the number of LIHEAP [Low-Income Home Energy Assistance Program] and GAP [Gas Affordability Program] customers that participate in CenterPoint’s CIP programs.”²⁸ This information is reported in the above table. The figures above regarding LIHEAP and GAP participation were established through a cross-check between the Company’s CIP participation,²⁹ LIHEAP, and GAP participation records.

For the 2021 CIP program year, a LIHEAP participant is defined as a customer who has received LIHEAP funding for the 2020-2021 or 2021-2022 winter seasons. LIHEAP in Minnesota is funded per winter season, so to cover a CIP year, both winter seasons are needed.

GAP is offered by CenterPoint Energy and is available to residential customers who receive LIHEAP assistance during the federal fiscal year, agree to be placed on a levelized payment plan, and qualify for an affordability and/or arrearage forgiveness credit levelized credit under the terms of the Program.³⁰ For the 2021 CIP program year, a GAP participant is defined as a GAP participant in the program at the end of the federal fiscal year as defined in CenterPoint Energy’s annual GAP Report.³¹

²⁸ *In the Matter of the Application of CenterPoint Energy Resources Corp. for Approval of its 2019 Gas Affordability Program Report* Docket No. G-008/M-20-399, Ordering Point 7 (Nov. 5, 2020).

²⁹ CIP cross-checks used the same definition of participant as is used in each individual program. The Company does not have information on customers to cross-check for LIHEAP/GAP in the School Kits Program or in Non-Profit Affordable Housing Rebates Program. Similarly, the Company is also unable to cross-check for LIHEAP/GAP in the C&I Customer Segment, including Low-Income Multi-Family Housing Rebates.

³⁰ *In the Matter of the Annual Compliance Submission of CenterPoint Energy Minnesota Gas, A Division of CenterPoint Energy Resources Corp., for its Gas Affordability Service Program*; MPUC Docket No. G-008/M-21-218 CenterPoint Energy GAP tariff, Section V, pp. 25 (Sept. 24, 2021).

³¹ *In the Matter of the Annual Compliance Submission of CenterPoint Energy Minnesota Gas, A Division of CenterPoint Energy Resources Corp., for its Gas Affordability Service Program*; MPUC Docket No. G-008/M-21-218, pp. 2 (Sept. 24, 2021).

Residential Market Segment Programs

CenterPoint Energy's Residential Market Segment achieved 99% of the Segment's participation goal and 121% of the energy savings goal while spending was 116% of budget.

CenterPoint Energy submits 2021 year-end information on the following residential programs:

- Home Efficiency Rebates;
- DIY Home Efficiency;
- Home Insulation Rebates;
- Home Energy Reports;
- Home Energy Squad;
- High-Efficiency Home;
- New Home Construction Rebates; and
- School Kits.

Residential Market Segment	Program Spending	Program Participation	Energy Savings (Dth)	\$/Dth	BenCost Results (Societal Test)
Home Efficiency Rebates	\$10,019,395	32,801	390,088	\$25.68	2.43
DIY Home Efficiency	\$507,013	11,486	38,633	\$13.12	5.96
Home Insulation Rebates	\$1,170,701	2,034	35,815	\$32.69	1.10
Home Energy Reports	\$977,733	193,665	110,839	\$8.82	2.31
Home Energy Squad	\$1,475,368	3,218	12,634	\$116.78	0.56
High-Efficiency Home	\$6,924,503	4,690	138,219	\$50.10	2.44
New Home Construction Rebates	\$683,307	6,037	27,830	\$24.55	2.06
School Kits	\$344,985	15,042	12,822	\$26.91	2.63
Residential Total	\$22,103,005	268,973	766,879	\$28.82	2.26

Detailed descriptions of Residential Market Segment programs can be found in *CenterPoint Energy's 2021-2023 Conservation Improvement Program Triennial Plan*.³²

Method Used to Determine Achievement of Low-Income and Renter Goals for the Residential Market Segment

The figures regarding low-income participation were established through a cross-check between CenterPoint Energy's CIP participation and Low-Income Home Energy Assistance Program ("LIHEAP") recipient records. Renter participation was established through a cross-check of rental data in CenterPoint Energy's customer information system.

Home Efficiency Rebates

³² *CenterPoint Energy's Approved 2021-2023 Conservation Improvement Triennial Plan*, Docket No. G-008/CIP-20-478, (Jan. 20, 2021).

The program achieved 123% of its participation goal and 111% of its energy savings goal while program spending was 110% of budget.

The following table shows the quantities of each type of measure rebated through the program:

Home Efficiency Rebates: Quantity of Measures Rebated

Measure Type	Quantity Rebated
Heating System Equipment	17,161
Water Heaters	2,990
Thermostats	10,655
ENERGY STAR® Laundry Equipment	382
Hearth with Electronic Ignition	1,613
Total	32,801

DIY Home Efficiency

The program achieved 75% of its participation goal and 94% of its energy savings goal while program spending was 78% of budget.

Home Insulation Rebates

The program achieved 122% of its participation goal and 152% of its energy savings goal while program spending was 116% of budget.³³

The Home Insulation Rebates program performed well in 2021. The Company believes this success was likely driven by demand for home improvement projects as people spent more time at home during the COVID-19 pandemic. This program was well-positioned to drive interest in weatherization home improvement projects.

The following table shows the quantities of each type of measure rebated through the program:

³³ In *CenterPoint Energy's 2021-2023 CIP Triennial Plan*, the Company stated that it would calculate energy savings for conservation measures consistent with the State of Minnesota Technical Reference Manual for Energy Conservation Improvement Programs ("TRM") version 3.1. See CenterPoint Energy's Approved 2021-2023 CIP Triennial Plan, Docket No. G-008/CIP-20-478, pp. A-5. However, in 2021 the Company deviated slightly from the TRM method when determining the 2021 energy savings for attic sealing measures. For attic sealing, the TRM includes a factor for converting leakage at 50 pascals to leakage at natural conditions. TRM, Version 3.1, Docket No. E,G-999/CIP-15-896, pp. 427-429, (Jan. 14, 2016). The information for determining this factor was not submitted for some rebates in 2021. As discussed with the Department in 2017, the Company assumed an average conversion factor for these rebates based on 2021 rebates for which the Company had complete information on the rebated home.

Home Insulation Rebates: Quantity of Measures Rebated

Measure Type	Quantity Rebated
Wall Insulation	271
Attic Sealing (alone)	34
Attic Insulation + Air Sealing	1,610
Sill Plate/Rim Joist	119
Total	2,034

Home Energy Reports

The program achieved 97% of its participation goal and 116% of its energy savings goal while program spending was 97% of budget.

Home Energy Squad

The program achieved 59% of its participation goal and 46% of its energy savings goal while program spending was 61% of budget.

There were 3,218 unique customer accounts served through squad visits, 344 of which were provided to self-identified low-income customers for no fee. In 2021, some municipalities chose to encourage participation in the Home Energy Squad program by paying a portion of program fees for their residents. In total, local units of government and neighborhood associations reduced customer's fees by providing \$120,355 in funding.

The Home Energy Squad budget was increased in the 2021-2023 Triennial due to several modifications in the preceding years that expanded participation goals and added new offerings. Participation in 2021 did not meet goal, in part due to reluctance of people allowing others into their home during the emerging COVID-19 pandemic variants in 2021. Virtual audits did not see the same level of interest they had in 2020 as an option during the pandemic. The Company will take these outcomes into account in the 2024-2026 Triennial Planning.

High-Efficiency Home

The program achieved 188% of its participation goal and 214% of its energy savings goal while program spending was 185% of budget.

The market for single family to fourplex homes continued to perform strongly in 2021, likely due to low interest rates and overall new home demand. The Company has realized the results of developing successful relationships with new home builders and home raters. Marketing also helped to communicate the rewards of this program for natural gas efficiency.

The following table shows how many participating homes achieved the energy savings required for each rebate tier.

High-Efficiency Home: Quantity of Participating Homes by Rebate Tier

Percent Gas Savings Above Code	Quantity of Homes Achieving
10-14%	451
15-19%	1,262
20-24%	2,003
25-29%	844
30-34%	113
35-39%	15
40% gas savings and above	2
Total	4,690

In 2021, no Passive House certification incentives were paid through the High-Efficiency Home program.

New Home Construction Rebates

The program achieved 155% of its participation goal and 158% of its energy savings goal, while program spending was 97% of budget.

The following table shows the quantities of each type of measure rebated through the program:

New Home Construction Rebates: Quantity of Measures Rebated

Measure Type	Quantity Rebated
Heating System Equipment	508
Water Heaters	64
Thermostats	757
ENERGY STAR® Laundry Equipment	31
Hearth with Electronic Ignition	4,677
Total	6,037

School Kits

The program achieved 100% of its participation goal and 83% of its energy savings goal, while program spending was 96% of budget.

The School Kits program continues to see interest with local schools providing strong positive feedback for using the conservation program as an educational opportunity. The estimates used for quantifying savings are from survey responses (see table below), and the differences between those responses in 2021 as compared to the *2021-2023 Triennial Plan* account for the lower energy savings rate despite meeting the participation goal.

In 2021, the Company collected information on the installation rates for participants in the School Kits program. This information was used to calculate energy savings per measure shown in the table below.

School Kits: Measure Energy Savings

Measure Type	<i>Base Energy Savings/ Measure</i>	<i>Installation Rates</i>	<i>% Gas Water Heaters</i>	<i>Savings/ Measure</i>
Low-flow (1.5 GPM) showerhead	1.76	50.6%	60.0%	0.54
Low-flow (1.5 GPM) kitchen faucet aerator	0.56	39.4%	60.0%	0.13
Low-flow (0.5 PGM) bathroom faucet aerator	0.49	43.2%	60.0%	0.13
Digital Water/Air Thermometer	0.86	11.2%	60.0%	0.06

Low-Income Market Segment Programs

CenterPoint Energy's Low-Income Market Segment achieved 70% of the Segment's participation goal and 122% of the energy savings goal, while spending was 100% of budget.

CenterPoint Energy's spending on the Low-Income Market Segment programs represents 0.71% percent of the Company's three-year average GOR from residential customers.³⁴ As summarized in Table 3 of the Compliance Overview section of this Status Report, when low-income CIP spending for 5+ multi-family buildings are included, the Company spent 0.80% percent of its three-year average GOR from residential customers to directly serve low-income customers.

CenterPoint Energy submits 2021 year-end information on the following dedicated low-income programs:

- Low-Income Weatherization;
- Low-Income Rental Efficiency;
- Low-Income Free Heating System Tune-Up;
- Non-Profit Affordable Housing Rebates; and
- Low-Income Multi-Family Housing Rebate.

Low-Income Market Segment	Program Spending	Program Participation	Energy Savings (Dth)	\$/Dth	BenCost Results (Societal Test)
Low-Income Weatherization	\$3,475,783	1,186	13,125	\$264.82	0.56
Low-Income Rental Efficiency	\$264,752	71	1,067	\$248.15	0.41
Low-Income Free Heating System Tune-Up	\$57,428	629	1,344	\$42.72	0.32
Non-Profit Affordable Housing Rebates	\$304,513	233	1,583	\$192.33	0.85
Low-Income Multi-Family Housing Rebates	\$176,390	43	11,499	\$15.34	2.48
Low-Income Total	\$4,278,865	2,162	28,619	\$149.51	0.69

³⁴ Consistent with how CIP energy savings goals are calculated for Triennial Plan filings, the Company calculated its three-year average GOR from residential customers using the three most recent years prior to filing *CenterPoint Energy's 2021-2023 Conservation Improvement Program Triennial Plan*. See CenterPoint Energy's Approved 2021-2023 Conservation Improvement Triennial Plan, Docket No. G-008/CIP-20-478, pp. 7 (Jan. 20, 2021). The Company calculated applicable minimum low-income spending amounts using the methodology approved by the Deputy Commissioner in 2015. See *In the Matter of CenterPoint Energy's Conservation Improvement Program 2013 Status Report*, Docket No. G-008/CIP-12-564.02, Deputy Commissioner Decision, Ordering Point 3 (Jan. 9, 2015).

Detailed descriptions of Low-income Market Segment programs can be found in *CenterPoint Energy's Approved 2021-2023 Conservation Improvement Program Triennial Plan*.³⁵

Method Used to Determine Achievement of Low-Income and Renter Goals for the Low-Income Market Segment

Low-income status of residential customer participants in the Low-Income Market Segment was verified by third party agencies such as Community Action and non-profit affordable housing agencies. Low-income multi-family housing customers provided documentation to CenterPoint Energy showing pre-qualification for the Department of Energy Weatherization Assistance Program ("WAP"), certification for Minnesota Low Income Rental Classification ("LIRC"), or other documentation including (but not limited to) participation in the project-based Section 8 voucher program. Renter participation was established either through a cross-check of rental data in CenterPoint Energy's customer information system or, when available, through third-party agency verification systems.

Low-Income Weatherization

The program achieved 93% of its participation goal and 88% of its energy savings goal while program spending was 112% of budget.

Program results were partially affected by COVID-19 in 2021 which created shortages in the workforce, clients unable to receive services due to COVID-19 status, and supply chain issues.

The following table shows the quantity and average cost of measures installed through the program:

³⁵ *CenterPoint Energy's Approved 2021-2023 Conservation Improvement Triennial Plan*. Docket No. G-008/CIP-20-478, (Jan. 25, 2021).

Low-Income Weatherization: Quantity and Average Cost of Measures

Measure Type ³⁶	Quantity	Average Cost of Measure
Weatherization	393	\$3,032
Furnaces	191	\$3,029
Boilers	12	\$6,235
Thermostats	112	N/A
Water Heaters	106	\$2,733
Furnace or Boiler Tune-Ups/Repairs	89	\$722
Pipe/Water Heater Insulation	283	N/A
Total	1,186	\$1,854

Low-Income Rental Efficiency

The program achieved 47% of its participation goal and 70% of its energy savings goal while program spending was 86% of budget.

Energy CENTS Coalition reported that participation in 2021 potentially reflects a combination of two market forces. For the first half of the year, the moratorium on evictions kept some property owners from having the funding needed for energy efficiency upgrades.³⁷ In the last months of 2021, the LIRE designated weatherization and contractors were impacted by COVID, stalling work.

The following tables show certain key program statistics, the quantity and total cost of measures installed, and the number of units in participating buildings in the program:

Low-Income Rental Efficiency: Key Program Statistics

Number of Properties	Total Dth Savings	Total Property Manager Contribution	Total Cost ³⁸	Property Manager Contribution %
69	1,067	\$121,043	\$231,942	52%

³⁶ In the Low-Income Weatherization Program, thermostats are typically installed in conjunction with other measures such as furnaces and boilers, and pipe/water heater insulation is reported in conjunction with weatherization. CenterPoint Energy does not track the cost of thermostats, pipe wrap, and water heater insulation separately, but their costs are included as part of the cost of the larger measures with which they are installed.

³⁷ Dates of COVID eviction moratorium guidelines available at <https://www.mnhousing.gov/sites/np/covid-19>. Visited on March 25, 2022

³⁸ Includes only the cost of the measures installed. Does not include the cost of the audit.

Low-Income Rental Efficiency: Quantity and Total Cost of Measures Installed

Type of Measure	Quantity	Total Cost
Weatherization Jobs	18	\$67,687
Furnaces	12	\$46,205
Boilers	11	\$72,200
Thermostats ³⁹	0	\$0
Water Heaters	13	\$27,350
Health & Safety	17	\$18,500
Furnace or Boiler Tune-Ups/Repairs	0	\$0
Total	71	\$231,942

Low-Income Rental Efficiency: Number of Units in Participating Buildings

Building Type	Quantity Participating
Single-Family	45
Duplex	20
Three-Unit	0
Four-Unit	4
Total	69

Low-Income Free Heating System Tune-Up

The program achieved 52% of its participation goal and 53% of its energy savings goal while program spending was 36% of budget.

This program resumed operations after being cut short in 2020. The Company was only able to administer this program in the spring of 2021. By fall, new variants of COVID-19 caused more people to be wary of letting others into their homes.

³⁹ In the Low-Income Rental Efficiency project, thermostats are typically installed in conjunction with other measures such as furnaces and boilers. CenterPoint Energy does not track the cost of thermostats separately, but their costs are included as part of the cost of the larger measures with which they are installed.

Non-Profit Affordable Housing Rebates

The program achieved 50% of its participation goal and 62% of its energy savings goal while program spending was 48% of budget.

43 buildings or 43 residences participated in the program. Program participation was affected by COVID-19 impacts on agency work force and supply chain issues.

The following table shows the quantities of each type of prescriptive measure installed through the program:

Non-Profit Affordable Housing Rebates: Quantity of Measures Installed

Type of Measure	Quantity
Heating System Equipment	17
Thermostats	28
Water Heaters	20
Heat Recovery Ventilators	3
Weatherization	60
Low-flow Showerheads and Aerators	64
Laundry Equipment	21
Total	213

In 2021, 20 homes participated in the Non-Profit Affordable Housing Rebates program performance path, and no Passive House certification rebates were paid through the Non-Profit Affordable Housing Rebates program.

The following table shows how many participating homes achieved the energy savings required for each rebate tier.

Non-Profit Affordable Housing Rebates: Performance Path

Percent Gas Savings Above Code	Quantity of Homes Achieving
10-14%	0
15-19%	2
20-24%	6
25-29%	7
30-34%	5
35-39%	0
40% or above	0
Total	20

Low-Income Multi-Family Housing Rebates

The program achieved 430% of its participation goal and 631% of its energy savings goal while program spending was 265% of budget.

The 43 participating buildings had a total of 4,560 units. In 2021, the main role for the LIMF program was to offer low-income multi-family building customers bonus prescriptive rebates to replace heating, water heating, and foodservice equipment when equipment failed for those customers who were not able to participate in the more holistic MFBE or EDA programs. Historically, participation in the Low-Income Multi-Family Housing Rebates program has been highly variable. In 2021, a larger number of multi-family properties participated in the Low-Income Multi-Family Housing Rebates (as well as C&I Heating and Water Heating Rebates). In particular, participation in tune-ups was significantly above expectations and was a major contributor to high building participation in 2021.

The following table shows the quantities of each type of measure rebated through the program:

Low-Income Multi-Family Housing Rebates: Quantity of Measures Installed

Type of Measure	Quantity
Furnaces	10
Boilers and boiler components	17
Steam Traps	2
Single Package Vertical Units	148
Pipe Insulation	3
Foodservice Equipment	3
Boiler Tune-Ups	95
Water Heaters	18
Total	296

Commercial and Industrial Market Segment Programs

CenterPoint Energy's C&I Market Segment achieved 96% of the segment's participation goal and 92% of its energy savings goal while spending 98% of budget.

CenterPoint Energy submits 2021 year-end information on the following C&I programs:

- Commercial Foodservice Equipment Rebates;
- C&I Heating and Water Heating Rebates;
- C&I Custom Rebates;
- C&I Audit Services;
- Energy Design Assistance;
- Code Compliance Support;
- Industrial Process and Commercial Efficiency;
- C&I Training and Education;
- Benchmarking Services and Certification Assistance;
- Recommissioning Study and Rebates; and
- Multi-Family Building Efficiency.

C&I Market Segment	Program Spending	Program Participation	Energy Savings (Dth)	\$/Dth	BenCost Results (Societal Test)
Commercial Foodservice Equipment Rebates	\$579,022	376	46,175	\$12.54	2.55
C&I Heating and Water Heating Rebates	\$3,951,372	6,725	659,124	\$5.99	4.63
C&I Custom Rebates	\$1,631,351	80	137,279	\$11.88	2.91
C&I Audit Services	\$431,493	325	32,389	\$13.32	3.03
Energy Design Assistance	\$1,959,363	67	167,791	\$11.68	1.70
Code Compliance Support	\$22,789	0	0	N/A	N/A
Industrial Process & Commercial Efficiency	\$235,474	11	9,911	\$23.76	1.67
C&I Training and Education	\$100,654	682	3,158	\$31.87	1.00
Benchmarking Services and Certification Assistance	\$169,451	1,230	0	N/A	N/A
Recommissioning Study and Rebates	\$104,058	17	5,996	\$17.35	0.71
Multi-Family Building Efficiency	\$773,310	236	14,187	\$54.51	1.02
C&I Total	\$9,958,337	9,749	1,076,011	\$9.25	2.59

Detailed descriptions of C&I Market Segment programs can be found in *CenterPoint Energy's Approved 2021-2023 Conservation Improvement Program Triennial Plan*.⁴⁰

Measurement and Verification Expenses

The Company provides the following information regarding expenses related to energy savings measurement and verification ("M&V") spending included in the C&I Market Segment spending total:⁴¹

2021 M&V Expenses	
Labor	\$2,000
Equipment	\$ 8,799
Contracting Expenses	\$0
Total	\$10,799

One customer project requiring M&V was completed in 2021 in the C&I Custom Rebates project.

Method Used to Determine Achievement of Low-Income and Renter Goals in the C&I Market Segment

Low-income participation in the C&I Market Segment is defined as verified low-income multi-family housing participants. Low-income multi-family housing customers provided documentation to CenterPoint Energy showing pre-qualification for WAP, certification for LIRC, or other documentation including (but not limited to) participation in the project-based Section 8 voucher program. Renter participation was established through a cross-check of Standard Industrial Classification ("SIC") codes in CenterPoint Energy's customer information system. Participants with SIC codes representing multi-family housing are considered "renter participants" in the C&I market.

Commercial Foodservice Equipment Rebates

The program achieved 75% of its participation goal and 76% of its energy savings goal while program spending was 83% of budget.

The 155 participating customers installed 376 energy conservation measures through the program. The Commercial Foodservice program gave three participants REBUILD triple rebates for high-efficiency foodservice equipment. The rebated foodservice measures had a combined

⁴⁰ *CenterPoint Energy's Approved 2021-2023 Conservation Improvement Triennial Plan*. Docket No. G-008/CIP-20-478, (Jan. 20, 2021).

⁴¹ In *CenterPoint Energy's Request for Modification to its Commercial/Industrial Project for its 2008 CIP Program Year*, Docket No. G-008/CIP-06-789, Commissioner Ordering Point 2 (Aug. 25, 2008), the Company was ordered to "track all labor, equipment, and third-party contracting expenses associated with its Measurement and Verification activities and to report these expenses as separate line items in its annual CIP status reports."

energy savings of 760 Dth and rebates in the amount of \$13,800 to qualifying customers who were affected by the civil unrest in 2020 and 2021.⁴²

C&I Heating and Water Heating Rebates

The program achieved 91% of its participation goal and 89% of its energy savings goal while program spending was 112% of budget.

The 1,427 participating customers installed 6,725 energy conservation measures through the program. The C&I Heating and Water Heating Rebates program gave five participants REBUILD triple rebates for high-efficiency foodservice equipment. The rebated measures had a combined energy savings of 7,452 Dth and rebates in the amount of \$108,263 to five qualifying customers who were affected by the civil unrest in 2020 and 2021.⁴³

C&I Custom Rebates

The program achieved 186% of its participation goal and 89% of its energy savings goal while program spending was 83% of budget. In 2021, CenterPoint completed 27 custom projects and 53 engineering assistance projects.

In 2021, CenterPoint Energy claimed 6,755 Dth in influenced savings. Partnering with CEE's One Stop Efficiency Shop, engineers installed thermostats inside buildings they were auditing. The engineers calculated the Dth savings and created reports to record these energy savings as well as lists of suggested energy efficiency upgrades to the owners of the buildings. CEE gave the Company a copy of the report with the suggested upgrades and the cost of the installation of the thermostats. With notification to the customer, the Company provided Engineering Assistance Rebates to CEE. The customers are expected to participate in other programs based on the audit report's suggested upgrades.

C&I Audit Services

The program achieved 162% of its participation goal and 487% of its energy savings goal while program spending was 91% of budget.

In 2021, the C&I Audit Services program achieved high participation and energy savings through increased Natural Gas Energy Analysis audits and steam trap audits. Streamlining audit services for the 2021-2023 *Triennial Plan* was an important contributor to increased participation and energy savings. CenterPoint Energy collaborated with Xcel Energy, Wright Hennepin, Madelia Municipal, Connexus, Central Municipal Power Agency and Services, Benco, and Minnesota Power to provide audits identifying both gas and electric savings opportunities for 50 customers.

⁴² For more information about the REBUILD program, please see the Informal Modification section of CenterPoint Energy's 2021 Status Report.

⁴³ For more information about the REBUILD program, please see the Informal Modification section of CenterPoint Energy's 2021 Status Report.

The following table shows the quantities of each type of service through the program:

C&I Audit Services: Participation and Energy Savings

Type of Measure	Participation	Energy Savings
Natural Gas Energy Analysis	194	9,379
Scoping audit	1	0
Steam trap audit (per trap)	130	22,984
Total	325	32,363

Energy Design Assistance

The program achieved 116% of its participation goal and 111% of its energy savings goal while program spending was 137% of budget.

In 2021, there were 239 enrolled participants in the program; however, only 67 participants completed energy efficiency projects in 2021. Multi-family continues to be the largest category of EDA program participants, with much of that construction happening in Minneapolis. The Company has taken an active role in enrolling those projects to drive high efficiency savings. Two of the completed projects did not qualify for a rebate; however, the Company claims 3,300 Dth of influenced savings for these projects. Of the 67 projects that were completed in 2021, 11 qualified as low-income multi-family housing participants serving 1,391 units of housing and were accordingly provided a higher rebate. In 2021, no Passive House or LEED certification incentives were paid through the Energy Design Assistance program.

In alignment with hybrid low-income/market rate program requirements, the following table shows low-income participation, energy savings, and rebates through the program relative to the *2021-2023 Triennial Plan*.

Energy Design Assistance: Low-Income Participation, Energy Savings, and Spending

Low-Income Metrics	Goal	Actual
Participation	8	13
Energy Savings (Dth)	20,639	28,589
Total Spending (\$)	\$195,700	\$395,117
Incentives (\$)	\$103,196	\$228,712

Commercial Code Compliance Support

The program achieved 0% of its participation goal and 0% of its energy savings goal while program spending was 41% of budget.

In 2021, there were no program participants. It took most of the program year to setup the implementation process and recruit cities to participate in the program. The Company is already seeing several potential program participants in 2022 and the program is continuing to recruit partner cities.

Industrial Process and Commercial Efficiency

The program achieved 110% of its participation goal and 57% of its energy savings goal while program spending was 67% of budget.

There were 11 enrolled participants in the program, and it paid rebates for 25 pieces of equipment in 2021. Each of the customers enrolled in the program received either an analysis to identify potential energy savings or a rebate through the program in 2021.

C&I Training and Education

The program achieved 68% percent of its participation goal and 392% of its energy savings goal while program spending was 75% of budget.

Of the 682 participants, 429 participated in high-efficiency foodservice equipment training, 85 in the Seasonal Energy Management Seminar, 83 in the Energy Efficiency and Technology Conference, 15 in the High-Efficiency Boiler Training Seminar, 58 in the Trade Ally Kick Off, and 12 in the Building Operator Certification Training.

C&I Training and Education participation remained lower than planned in 2021, in part due to continued COVID-19 restrictions and the need for in-person meetings for some training and educational events. In the first year of offering the Building Operator Certification, the Company exceeded its participation goal and significantly exceeded its energy savings goals due to training participation by facilities managers of larger than expected buildings.

Benchmarking Services and EnergyStar Certification Assistance

The program achieved 207% percent of its participation goal, while program spending was 75% of budget.

In 2021, a total of 17 rebates were for ENERGY STAR certification. There were 1213 users of the Energy Data Portal. Participation in the Energy Data Portal was about double expectations.

Recommissioning Study & Rebates

The program achieved 68% percent of its participation goal and 48% percent of its energy savings goal while program spending was 71% of budget.

In 2021, COVID-19 introduced challenges to measure schedule changes, programming changes, and occupancy changes in buildings that were often empty. Participation in 2021 also mostly included studies, so more rebates were paid for projects without energy savings in 2021 as compared to prior years.

Multi-Family Building Efficiency

The program achieved 77% percent of its participation goal and 59% percent of its energy savings goal while program spending was 69% of budget.

The MFBE program achieved its participation goal for whole buildings (see table below), but underperformed in energy savings in 2021. This could be in part due to the extent to which the moratorium on evictions due to COVID-19 kept property owners from having the funding needed for energy efficiency upgrades.

In 2021, there was no renter kit participation. The intent of the MFBE program is to provide Energy Efficiency measures to Multi-family buildings. Renter kits are an important stopgap provided to those individuals whose property owners do not want to participate in MFBE. However, in 2021 the Company was not aware of any multi-family buildings with renters interested in energy efficiency whose property owners have not participated (or are going to participate) in MFBE.

Multi-Family Building Efficiency: Participation Detail

MFBE Participation ⁴⁴	Goal	Actual	Percent Achieved
Whole Building Participation	236	236	100%
Renter Kit Participation	69	0	0%
Totals	305	236	77%

In alignment with hybrid low-income/market rate program requirements, the following table shows low-income participation, energy savings, and rebates through the program relative to the *2021-2023 Triennial Plan*.

⁴⁴ *In the Matter of CenterPoint Energy's 2021-2023 Natural Gas Conservation Improvement Program Triennial Plan*, Docket No. G-008/CIP-20-478, pp. 143 (Jan. 20, 2021).

Multi-Family Building Efficiency: Low-Income Metrics

Low-Income Metric	Goal	Actual
Participation (Buildings)	59	43
Participation (Kits)	16	0
Energy Savings (Dth)	5,851	4,999
Total Spending (\$)	\$275,110	\$180,818
Incentives (\$)	\$42,923	\$55,415

On November 25, 2020, the Department issued a Decision on CenterPoint Energy's 2021-2023 *Triennial Plan* that included an order that the Company report additional Multi-Family Building Efficiency program performance metrics for the 2021 CIP Status Report.⁴⁵ These metrics are shown in the table below.

Multi-Family Building Efficiency: Completed Program Steps⁴⁶

Building Type	Completed Program Step	Buildings	Units	Energy Savings	Rebates
Market Rate	Assessment	202	9,169	n/a	n/a
Market Rate	Direct Installation	30	1,713	6,187	n/a
Market Rate	Performance Incentives	18	1,077	3,000	\$29,634
Low-Income	Assessment	36	2,663	n/a	n/a
Low-Income	Direct Installation	3	215	989	n/a
Low-Income	Performance Incentives	13	962	4,010	\$55,415

In alignment with the Department's 2020 decision on reporting on spending related to low-income multi-family buildings for the 2021-2023 Triennial Plan,⁴⁷ the Company is reporting the requested information in the table below.

⁴⁵ *In the Matter of CenterPoint Energy's 2021-2023 Natural Gas Conservation Improvement Program Triennial Plan*, Docket No. G-008/CIP-20-479, pp. 88 (Nov. 25, 2020).

⁴⁶ Building and unit participation listed in this table may appear to differ from total program participation because the MFBE project counts a building as participating if it received at least one of the following: assessment, direct installation, or performance incentives.

⁴⁷ *In the Matter of CenterPoint Energy's 2021-2023 Natural Gas Conservation Improvement Program Triennial Plan Decision*, Docket No. G-008/CIP-20-478, pp. 70 (Nov. 25, 2020).

Multi-Family Building Efficiency: Rebate Measures

Measure Type	Market Rate Quantity	Market Rate Incentives	LI Quantity	LI Incentives
Custom/Bundled Measures ⁴⁸	2	\$4,067	3	\$23,947
Smart thermostats	146	\$9,490	25	\$1,625
AC Covers	0	\$0	0	\$0
C&I high-efficiency hot water boiler	1	\$1,755	6	\$26,887
CO Sensor	9	\$1,170	0	\$0
Boiler tune-up	8	\$653	0	\$0
Commercial water heater non-GAMA rated (88%+ thermal efficiency)	5	\$3,627	4	\$2,461
Boiler controls	2	\$390	1	\$240
96% AFUE furnace	14	\$7,280	0	\$0
Commercial pipe insulation	1	\$1,203	1	\$255
Total	188	\$29,634	40	\$55,415

⁴⁸ Custom Measures / Bundled Measures were counted as one measure.

Other Programs

CenterPoint Energy's Other Program spending was 72% of budget.

CenterPoint Energy submits 2021 year-end information on the following CIP programs:

- Analysis, Evaluation, & Project Development;
- Energy Efficiency Marketing & Awareness;
- Planning and Regulatory Affairs; and
- EZ Pay On-Bill Loan.

In addition, two Alternative CIPs, EnerChange and EnergySmart, have been approved for inclusion in the Company's CIP. This section includes budgetary information regarding each Alternative CIP, but, as neither Alternative CIP is administered by CenterPoint Energy, the Company asks that any requests for information regarding program activities be directed to the respective program administrators.

Other Programs Total	Program Spending	Program Participation	Energy Savings (Dth)	\$/Dth	BenCost Results (Societal Test)
Analysis, Evaluation, & Project Development	\$1,058,803	0	0	N/A	N/A
Energy Efficiency Marketing & Awareness	\$780,955	0	0	N/A	N/A
Planning & Regulatory Affairs	\$145,330	0	0	N/A	N/A
EZ Pay On-Bill Loan	\$114,324	21	0	N/A	N/A
Other Programs Total	\$2,099,412	21	0	N/A	N/A

Method Used to Determine Achievement of Low-Income and Renter Goals in the Other Programs Segment

Low-income and renter participation is not applicable to programs in this Segment.

Analysis, Evaluation, & Project Development

CenterPoint Energy's Analysis, Evaluation, & Project Development spending was 71% of budget.

Activities supporting the development of CIP projects included membership in the Gas Technology Institute's ("GTI") Emerging Technology Program ("ETP"); membership in the Midwest Energy Efficiency Alliance ("MEEA"); membership in the Association of Energy Services Professionals; and participation in various energy efficiency conferences, either in person or virtually as required by the pandemic. Company employee time was spent working to develop new CIP offerings, which is included in the total spending for this project, as are costs related to evaluation of existing CIP offerings by external consultants.

In the *2021-2023 CIP Triennial Plan*, CenterPoint Energy proposed a similar budget for this project for evaluation and research and development (“R&D”) spending as compared to its last triennial period. The Company requested that only its true R&D spending be counted against the statutory cap on R&D, rather than the full project budget as had been the case in previous Triennial Plans. The Deputy Commissioner approved the request and directed the Company to include a narrative summary of its R&D activities, and the corresponding dollar amounts for each R&D activity, as part of the Company’s annual status reports.⁴⁹

Accordingly, the Company provides the following information regarding its 2021 R&D spending and activities. Due to the COVID-19 pandemic effecting implementation of R&D projects, spending in 2021 was lower than prior years. 2021 R&D spending totaled \$150,389 and included:

- \$37,125 for an ICF and E Source groundbreaking study to comprehensively explore what can be learned from academic research into consumer behavior and pricing/discounting theory. CenterPoint Energy is one of approximately 10 sponsors who are participating in this 12-month project. The study will also promote cooperation between manufacturers, distributors, retailers, and program administrators—providing a platform for understanding of regulatory restrictions or other constraints faced by stakeholders. The study continued into 2022.
- \$29,000 for the Integrating Health and Energy Efficiency research project. This project will investigate new, innovative approaches to reaching the CNP customers most in need of energy efficiency improvements by exploring how to integrate energy efficiency and healthcare services to serve income-qualified families. The study continued into early 2022.
- \$25,000 in support of a GTI project to field test emerging natural-gas driven heat pumps through the ETP. The study continues in 2022.
- \$11,789 for a field pilot of a technology to capture carbon from natural gas appliance flue gases. The pilot is intended to evaluate performance of the technology and assess energy savings benefits to establish whether it is appropriate to include the technology in future CIP programming. Due to both the pandemic and to challenges in the permitting process, activity in 2021 focused on getting permit approval for the first installation from the Department of Labor and Industry. Approval was received in early 2022, so the pilot will continue in 2022 with the first installation.
- \$30,000 in support of a Center for Energy and Environment project to study the impact of the City of Minneapolis’s new energy disclosure requirements at the time of home sales. The current study concluded in 2021.
- \$17,475 in support of research by the Greater Minnesota Housing Corporation to develop and evaluate highly efficient home designs for use in affordable single-family housing construction. The study concluded in 2021.

⁴⁹ *In the Matter of CenterPoint Energy’s 2020 Conservation Improvement Program Triennial Plan*, Docket No. G-008/CIP-20-479, *et al.*, Deputy Commissioner Decision, pp. 12 (Nov. 25, 2020).

In addition to the activities enumerated above, the Company participated in a Midwest Utility R&D Collaborative coordinated by MEEA. This effort began in 2018 with several midwestern utilities (including CenterPoint Energy, ComEd, Nicor Gas, Xcel Energy, DTE, and others) to share energy-efficiency related R&D results and progress in order to identify opportunities to collaborate, avoid duplication of effort, and learn from each other's work. There were no incremental costs associated with participation in the Collaborative in 2021.

Energy Efficiency Marketing & Awareness

Program spending was 104% of budget.

General awareness marketing and promotion of the entire energy efficiency portfolio of programs and services activities, directed at residential and business mass markets, and focusing on the benefits of energy efficiency and natural gas conservation included: network and cable television including a MN Vikings package, Minnesota Public Radio, streaming audio, digital (display/social), web, paid search, events, print (bill insert) and sports sponsorships with the University of Minnesota Gophers and the National Sports Center. The Energy Efficiency Marketing and Awareness program budget paid for these promotions

Planning and Regulatory Affairs

Program spending was 73% of budget.

Planning and Regulatory Affairs program expenditures include staff salaries; benefits; and expenses (such as computers, printing, phones, and postage) associated with managing, tracking, and administering CIP.

EZ Pay On-Bill Loan

Program spending was 24% of budget. 2021 was the first full year of the program.

The EZ Pay On-Bill Loan program (EZPAY) funded 21 new loans, which provided CenterPoint Energy customers with financing for 26 efficient gas measures. 17 non-gas energy efficiency measures were also funded by the loans, primarily air conditioners, but also including non-rebate eligible thermostats, a water heater, asbestos/vermiculate remediation, duct work/venting, and ventilation/bath fans. Six customers were not eligible to participate – five customers did not meet (e.g., account in arrears, rental property, etc.) CenterPoint Energy's account eligibility requirements and one customer was not eligible for the loan according to the loan provider.

Program participation was affected by a variety of factors – COVID-19, workforce shortages, supply chain issues, the housing expansion and inflation pressure. Trade ally participation in the program started out slower than anticipated due to an abundance of work opportunities for residential contractors in 2021. The market customers that appear to have been prioritized by the trades did not typically require the type of financing assistance EZPAY was developed to

address. The Company believes there is unmet need for financing, so for 2022 the Company will be researching and developing outreach campaigns for directly engaging customers.

EnerChange

Program spending was 96% percent of budget.

The EnerChange program was proposed for inclusion in the Company's CIP by the National Initiative by Consumers of Energy d/b/a EnerChange ("EnerChange"). The Deputy Commissioner approved the EnerChange program with a total budget of \$361,000 for the 2021 program year.⁵⁰ The program is an indirect-impact conservation program for which no energy savings are claimed. EnerChange filed its Annual Program Status Report for 2021 on March 30, 2022 in Docket No. G-008/CIP-20-478. Because this program is an Alternative CIP proposed and managed by EnerChange, CenterPoint Energy asks that any requests for additional information regarding program activity be directed to EnerChange.

EnergySmart

Program spending was 98% percent of budget.

The EnergySmart program was proposed for inclusion in the Company's CIP by the Minnesota Waste Wise Foundation ("MWWF"). The Deputy Commissioner approved the EnergySmart program with a total budget of \$178,000 for the 2021 program year.⁵¹ The program is an indirect-impact conservation program for which no energy savings are claimed. EnergySmart has not yet filed its Annual Program Status Report for 2021 in Docket No. G-008/CIP-20-478. Because this program is an Alternative CIP proposed and managed by MWWF, CenterPoint Energy asks that any requests for additional information regarding program activity be directed to MWWF.

⁵⁰ *In the Matter of CenterPoint Energy's 2021-2023 Natural Gas Conservation Improvement Program Triennial Plan*, Docket No. G-008/CIP-20-478, Deputy Commissioner Decision, pp. 46 (Nov. 25, 2020).

⁵¹ *In the Matter of CenterPoint Energy's 2021-2023 Natural Gas Conservation Improvement Program Triennial Plan*, Docket No. G-008/CIP-20-478, Deputy Commissioner Decision, pp. 44 (Nov. 25, 2020).

Total Program Cost-Benefit Analysis

The BenCosts provided below include the cost-benefit analyses for the Company's total 2021 CIP goals and actual results.⁵²

Conservation Improvement Program (CIP)				BENEFIT COST FOR GAS CIPS-- Cost-Effectiveness Analysis			
Company: CenterPoint Energy Project: Total CenterPoint Energy CIP 2021 Goal (Full Behavioral Savings)							
Input Data				First Year	Second Year	Third	Year
1) Retail Rate (\$/Dth) =	\$5.36						
Escalation Rate =	4.69%						
2) Non-Gas Fuel Retail Rate (\$/Fuel Unit) =	\$0.000						
Escalation Rate =	3.59%						
Non-Gas Fuel Units (ie. kWh, Gallons, etc) =	kWh						
3) Commodity Cost (\$/Dth) =	\$3.25						
Escalation Rate =	4.69%						
4) Demand Cost (\$/Dth/Yr) =	\$115.55						
Escalation Rate =	4.69%						
5) Peak Reduction Factor =	1.00%						
6) Variable O&M (\$/Dth) =	\$0.0500						
Escalation Rate =	4.69%						
7) Non-Gas Fuel Cost (\$/Fuel Unit) =	\$0.000						
Escalation Rate =	3.59%						
8) Non-Gas Fuel Loss Factor	7.70%						
9) Gas Environmental Damage Factor (\$/Dth) =	\$2.0700						
Escalation Rate =	2.30%						
10) Non Gas Fuel Enviro. Damage Factor (\$/Un	\$0.0198						
Escalation Rate =	2.30%						
11) Participant Discount Rate =	5.39%						
12) CIP Utility Discount Rate =	5.39%						
13) Societal Discount Rate =	3.02%						
14) General Input Data Year =	2020						
15a) Project Analysis Year 1 =	2021						
15b) Project Analysis Year 2 =	2022						
15c) Project Analysis Year 3 =	2023						
16 Utility Project Costs							
16 a) Administrative & Operating Costs =	\$ 19,930,132	\$	-	\$	-	\$	-
16 b) Incentive Costs =	\$ 16,379,825	\$	-	\$	-	\$	-
16 c) Total Utility Project Costs =	\$ 36,309,957	\$	-	\$	-	\$	-
17) Direct Participant Costs (\$/Part) =	190.923						
18) Participant Non-Energy Costs (Annual \$/Part) =	-						
Escalation Rate =	2.30%	2.30%					2.30%
19) Participant Non-Energy Savings (Annual \$/Part) =	-						
Escalation Rate =	2.30%	2.30%					2.30%
20) Project Life (Years) =	10.943						
21) Avg. Dth/Part. Saved =	7.12						
22) Avg Non-Gas Fuel Units/Part. Saved =	0 kWh	0 kWh					0 kWh
22a) Avg Additional Non-Gas Fuel Units/ Part. Used =	0 kWh	0 kWh					0 kWh
23) Number of Participants =	284,013						
24) Total Annual Dth Saved =	2,021,875						
25) Incentive/Participant =	\$57.67	\$0.00					\$0.00
Cost Summary				Triennial NPV		Triennial B/C	
1st Yr	2nd Yr	3rd Yr	Test Results				
Utility Cost per Participant =	127.85	#DIV/0!	#DIV/0!	Ratepayer Impact Measure Test		(\$56,786,460) 0.64	
Cost per Participant per MCF =	44.78	#DIV/0!	#DIV/0!	Utility Cost Test		\$64,053,121 2.76	
Lifetime Energy Reduction (MCF)	22,240,621			Societal Test		\$83,901,865 2.13	
Societal Cost per MCF	\$3.33			Participant Test		\$82,994,768 2.53	

⁵² Behavioral energy savings are reported consistent with *In the Matter of Inclusion of Behavioral Project Savings in Energy Conservation Improvement Programs and Shared Savings Demand-Side Management Financial Incentive Calculations*, Docket No. E,G-999/CI-08-133, *et al.*, Deputy Commissioner Decision (Apr. 26, 2012). In accordance with the Average Savings Method, the full savings for behavioral programs are used for BenCost analyses; reduced savings are used elsewhere in the report. Alternative CIP project and CIP assessments are excluded from spending used in all BenCost modeling.

Conservation Improvement Program (CIP)

BENEFIT COST FOR GAS CIPS— Cost-Effectiveness Analysis

 Company: **CenterPoint Energy**
 Project: **CenterPoint Energy CIP 2021 Total Actual (Full Behavioral Savings)**

Input Data		First Year	Second Year	Third Year
1) Retail Rate (\$/MCF) =	\$6.21			
Escalation Rate =	4.69%			
2) Non-Gas Fuel Retail Rate (\$/Fuel Unit) =	\$0.000			
Escalation Rate =	3.59%			
Non-Gas Fuel Units (ie. kWh,Gallons, etc) =	kWh			
3) Commodity Cost (\$/MCF) =	\$3.25			
Escalation Rate =	4.69%			
4) Demand Cost (\$/Unit/Yr) =	\$115.55			
Escalation Rate =	4.69%			
5) Peak Reduction Factor =	1.00%			
6) Variable O&M (\$/MCF) =	\$0.0500			
Escalation Rate =	4.69%			
7) Non-Gas Fuel Cost (\$/Fuel Unit) =	\$0.000			
Escalation Rate =	3.59%			
8) Non-Gas Fuel Loss Factor	7.70%			
9) Gas Environmental Damage Factor =	\$2.0700			
Escalation Rate =	2.30%			
10) Non Gas Fuel Enviro. Damage Factor (\$/Unit)	\$0.0198			
Escalation Rate =	2.30%			
11) Participant Discount Rate =	3.02%			
12) Utility Discount Rate =	5.39%			
13) Societal Discount Rate =	3.02%			
14) General Input Data Year =	2020			
15a) Project Analysis Year 1 =	2021			
15b) Project Analysis Year 2 =	2022			
15c) Project Analysis Year 3 =	2023			
16 Utility Project Costs				
16 a) Administrative & Operating Costs =	\$ 14,667,470			
16 b) Incentive Costs =	\$ 19,669,675			
16 c) Total Utility Project Costs =	\$ 34,337,144	\$ -	\$ -	\$ -
17) Direct Participant Costs (\$/Part) =	219.293			
18) Participant Non-Energy Costs (Annual \$/Part) =	-	-	-	-
Escalation Rate =	2.16%	2.16%	2.16%	2.16%
19) Participant Non-Energy Savings (Annual \$/Part) =	-	-	-	-
Escalation Rate =	2.16%	2.16%	2.16%	2.16%
20) Project Life (Years) =	11.297			
21) Avg. MCF/Part. Saved =	7.447	#DIV/0!	#DIV/0!	#DIV/0!
22) Avg Non-Gas Fuel Units/Part. Saved =	0 kWh	0 kWh	0 kWh	0 kWh
22a) Avg Additional Non-Gas Fuel Units/ Part. Used =	0 kWh	0 kWh	0 kWh	0 kWh
23) Number of Participants =	278,765	-		
24) Total Annual MCF Saved =	2,076,067	-		
25) Incentive/Participant =	\$70.56	#DIV/0!	#DIV/0!	#DIV/0!

Cost Summary	1st Yr	2nd Yr	3rd Yr	Test Results	Triennial NPV	Triennial B/C
Utility Cost per Participant =	123.1759523	#DIV/0!	#DIV/0!	Ratepayer Impact Measure Test	(\$78,426,578)	0.59
Cost per Participant per MCF =	45.98518124	#DIV/0!	#DIV/0!	Utility Cost Test	\$77,715,201	3.26
Lifetime Energy Reduction (MCF)	24,912,798			Societal Test	\$102,121,736	2.35
Societal Cost per MCF	3.042557473			Participant Test	\$135,713,077	3.22

SECTION 2: 2021 DEMAND-SIDE MANAGEMENT FINANCIAL INCENTIVE REPORT

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, (“CenterPoint Energy” or the “Company”) submits this report in compliance with the Minnesota Public Utilities Commission’s (“Commission”) *Order Establishing Utility Performance Incentives for Energy Conservation* (“Order”) and the Commission’s Rules of Practice and Procedure.^{53 54}

CenterPoint Energy used the financial incentive mechanism approved by the Commission to calculate the requested financial incentive amount.⁵⁵ Details of the calculation of the financial incentive are included in Attachment A of this filing. The calculations also rely on the results of the BenCost cost-effectiveness analysis of the Company’s 2021 Conservation Improvement Program (“CIP”). In 2021, the Company elected to exclude cost-ineffective low-income projects for its cost-effectiveness testing used in the calculation of the financial incentive as permitted by statute.⁵⁶ The low-income segment is not cost-effective based on the societal or utility test, and the only low-income project that is cost-effective is Low-Income Multi-Family Housing Rebates (Section 1). Attachment B shows 2021 CIP cost-effectiveness testing without the low-income projects⁵⁷ that are cost-ineffective which results in total net benefits of \$77,715,201. The following table summarizes how removing the low-income segment changes the assessment of net benefits using the utility cost test:

Adjustment to Conservation Improvement Program Net Benefits	
Utility Cost Test Net Benefits with the Cost-Ineffective Low-Income Projects	\$74,536,729
Utility Cost Test Net Benefits without the Cost-Ineffective Low-Income Projects	\$77,715,201

As permitted by Commission Order, CenterPoint Energy excluded the third-party EnerChange and EnergySmart projects from its financial incentive calculations;⁵⁸ the figures given here and in Attachments A and B reflect that election. Assessments under Minnesota Statute § 216B.241 and the Next Generation Energy Act of 2007 (“NGEA”) are also excluded from the calculation of

⁵³ As described in *In the Matter of Commission Review of Utility Performance Incentives for Energy Conservation Pursuant to Minn. Stat. § 216B.241, Subd. 2c*, Docket No. E,G-999/CI-08-133, Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan (Dec. 9, 2020).

⁵⁴ Minn. R. Ch. 7829.

⁵⁵ See *Id.* 53.

⁵⁶ Minn. Stat. § 216B.241, Subd. 7i permits, at the discretion of the utility, the exclusion of low-income costs and benefits associated with any approved low-income gas CIP from the calculation of net economic benefits for the purposes of calculating the financial incentive calculation when these programs are not cost-effective.

⁵⁷ Low-Income Weatherization, Low-Income Rental Efficiency, Low-Income Heating System Tune-ups, Non-Profit Affordable Housing Rebates.

⁵⁸ See *Id.* 53.

the incentive in accordance with Commission Order.⁵⁹ The following table summarizes these adjustments to the Company's 2021 CIP spending:

Adjustments to Post-Year Spending	
Total Spending (from CIP Tracker Report)	\$39,569,431
Exclude NGEA Assessments	\$608,852
Exclude EnerChange and EnergySmart	\$520,959
Total Post-Year Spending	\$38,439,620

As detailed in the *2021 Conservation Improvement Program Status Report* section of this filing, the Company's total energy savings in 2021 were 1,871,509 dekatherms ("Dth"), or 1.26 percent of retail sales.⁶⁰ As shown in the worksheets in Attachment A, this level of performance qualifies the Company for a financial incentive award of up to 10 percent of the benefits achieved with a cap limiting the incentive to no more than 30 percent of 2021 CIP expenditures. Ten percent of 2021 net benefits is \$7,771,520, and 30 percent of 2021 spending is \$11,531,886. The tables below illustrate the calculation of the Company's CIP financial incentive based on the net benefits.

CenterPoint Energy's 2021 Financial Incentive as a Percent of Net Benefits without Regard to Expenditure Cap	
2021 Energy Savings	1,871,509 Dth
Energy Savings as Percent of Retail Sales	1.26%
2021 Net Benefits Achieved	\$77,715,201
Percent of Net Benefits Awarded at Percent of Retail Sales Avoided	10%
2021 Financial Incentive Eligibility Calculated as a Percent of Net Benefits	\$7,771,520

CenterPoint Energy's 2021 Financial Incentive Cap on CIP Program Expenditures	
2021 CIP Spending	\$38,439,620
Commission-approved Cap on Incentive as a Percent of Expenditures	30%
2021 Financial Incentive Eligibility Calculated as a Percent of CIP Expenditures	\$11,531,886

CenterPoint Energy's 2021 CIP efforts will result in approximately \$69,943,680 in net benefits after the incentive.

⁵⁹ See *Id.* 53.

⁶⁰ The Company's 2017-2019 three-year-average weather-normalized sales to non-CIP-exempt customers are 148,546,443 Dth. See Compliance Overview section.

Summary of CenterPoint Energy's 2021 Requested Financial Incentive	
Requested 2021 Financial Incentive	\$7,771,520
Requested Incentive as a Percent of Net Benefits Achieved	10%
2021 Total Net Benefits Achieved	\$77,715,201
2021 CIP Net Benefits After Requested Incentive	\$69,943,680

The Company respectfully requests the Commission approve CenterPoint Energy's 2021 CIP financial incentive in the amount of **\$7,771,520**, to be entered in the Company's CIP Tracker as of the issue date of the Commission's Order.

SECTION 3: CONSERVATION IMPROVEMENT PROGRAM

TRACKER REPORT

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, (“CenterPoint Energy” or the “Company”) presents its Conservation Improvement Program (“CIP”) Tracker activity in the table at the end of this discussion.

The 2021 CIP Tracker Report beginning balance was an under-recovery of \$1,952,441.⁶¹ The ending balance on December 31, 2021 is an under-recovery of \$11,164,791.

The 2021 CIP Tracker Report reflects recovery of the interim Conservation Cost Recovery Charge (“CCRC”) of \$0.2382 per dekatherm (“Dth”) from the 2019 rate case that went into effect on January 1, 2020 and the final CCRC of \$0.2372 per Dth that went into effect on June 1, 2021.^{62 63}

An adjustment in CCRC recovery was made as the result of final rates that went into effect on June 1. The adjustment was calculated based on the difference between final and interim CCRA rates charged from January 1, 2020 to June 1, 2021. See spreadsheet Exhibit A for full details. A total of 242,874,928 Dth were charged a CCRC of \$0.2382 per Dth. Some customers’ May gas use (i.e., 2,230,506 Dth) was accounted for in June due to the misalignment of billing cycles with calendar months. The CIP Tracker table reported at the end of this section already assumes \$0.2372 per Dth for all June volumes and therefore the adjustment was calculated based on 240,644,421 Dth.⁶⁴ The implementation of final rates required a reduction of CCRA recovery of \$240,644.42 (line 10) to reflect the final rate customers would have been charged from January 1, 2020 to June 1, 2021.⁶⁵ The total amount recovered via the CCRC is reflected in the table (line 11) at the end of this section.

On October 1, 2020 the Commission approved a Conservation Cost Recovery Adjustment (“CCRA”) of \$0.0591 per Dth.⁶⁶ On October 21, 2021 the Commission approved a CCRA of

⁶¹ *In the Matter of CenterPoint Energy’s 2021 Conservation Improvement Program (CIP) Cost Recovery*, Docket No. G-008/M-21-328, Ordering Point 2 (Oct. 22, 2021).

⁶² *In the Matter of the Application by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G-008/GR-19-524, (Sept. 26, 2019).

⁶³ *In the Matter of the Application of CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, for Authority to Increase Rates for Natural Gas Utility Service in Minnesota*, Docket No. G-008/GR-19-524, Compliance Filing, Schedule B-1 (Mar. 12, 2021).

⁶⁴ Gas volumes calculation: (242,874,928 Dth – 2,230,506 Dth) = 240,644,421 Dth

⁶⁵ Final CCRC adjustment calculation: 240,644,421 Dth x (\$0.2382/Dth - \$0.2372/Dth) = \$240,644.42.

⁶⁶ *In the Matter of CenterPoint Energy’s 2019 Conservation Improvement Program (CIP) Cost Recovery*, Docket No. G-008/M-20-455, Ordering Point 4 (Aug. 18, 2020). The PUC ordered that the effective date of the CCRA retroactively be October 1, 2019. The Company discussed the effective date of the CCRA with PUC Staff and agreed that the intent of the Order was for the Company’s new CCRA to be effective on October 1, 2020 and not October 1, 2019.

\$0.0791 per Dth.⁶⁷ The new CCRA rate went into effect December 1, 2021 and remains in effect. The amount recovered via the CCRA is reflected in the table (line 15) at the end of this section. See Section 4 of this filing for more discussion of the new CCRA proposal.

In August 2021, CenterPoint Energy identified an issue with accounting of CIP through the CCRC and CCRA. The revenue collected from two CIP Exempt customers was incorrectly allocated to the CIP accounts despite being CIP Exempt.⁶⁸ To correct this error, total CIP recovery was reduced by \$1,872,178 in August based on the CIP recovery in each month from January 1, 2019 to July 1, 2021. See spreadsheet Exhibit A for full details. Please note that final rates from the 2019 rate case were assumed as a part of this calculation. The final CCRC rate implementation adjustment calculation in June included the volumes from these CIP exempt customers. Finally, a result of this issue is that carrying charges accrued in the customers' favor. The Company proposes to not revise these carrying charges and just implemented the CIP recovery adjustment (line 17) when it was identified in August.

Monthly CIP expenses are shown in the table as a single total (line 2). These deferred expense totals include assessments made by the Department of Commerce under Minnesota Statutes § 216B.241 and the Next Generation Energy Act of 2007 ("NGEA"). These assessments have not been included in the total CIP spending reported in Section 1 of this filing but are included in the CIP Tracker because the NGEA provides for utilities to recover the assessments through the CIP Tracker mechanism.⁶⁹ Spending on alternative third-party CIPs is also excluded from total spend reported in Section 1 of this filing but included in the CIP Tracker. As described in Section 1, total CIP spending in 2021 was \$38,439,620; the assessments totaled \$608,852 and spending on alternative third-party CIPs totaled \$520,959, resulting in total recoverable CIP expenses of \$39,569,431 in 2021. Assessments and alternative third-party CIP spending were also excluded from the calculation of the financial incentive requested in Section 2 of this filing.

Miscellaneous Expenses

Included in the 2021 CIP expenses are various meals, travel, and miscellaneous CIP-related expenses.⁷⁰

CenterPoint Energy believes it is necessary and reasonable to spend a modest amount of ratepayer funds on meals, travel, and miscellaneous expenses to encourage participation in the Company's CIP projects and to educate staff on new energy efficiency technologies and best practices for program design and delivery. Examples of reasonable and necessary expenses

⁶⁷ *In the Matter of CenterPoint Energy's 2021 Conservation Improvement Program (CIP) Cost Recovery*, Docket No. G-008/M-21-328, Ordering Point 3 (Oct. 22, 2021).

⁶⁸ This error was identified and corrected for July 2021. The error occurred because many CIP exempt customers work with marketers for their gas use. To protect customer privacy CenterPoint Energy provides a new account number to the customer whenever their marketer changes. Two CIP exempt customers changed account numbers in 2019, but accounting and regulatory departments were not notified. Process improvements have been put in place to inform those departments about any changes to the accounts of CIP exempt customers.

⁶⁹ Minn. Stat. § 216B.241, subd. 2b.

⁷⁰ Minn. Stat. § 216B.16, subd. 17.

supporting CIP include dues for Company membership in energy efficiency-related organizations, employee participation in energy efficiency workshops and conferences, employee training, and a variety of miscellaneous expenses such as program related mileage and parking expenses for employees involved in delivering and promoting CIP.

These miscellaneous expenses of \$54,920 are 0.14 percent of the total non-assessment, non-third party-alternative CIP, expenses included for recovery in this docket (\$38,439,620). The total amount of 2021 spending in each miscellaneous expense category is as follows:

Category	Expense
Meals	\$125
Entertainment	\$0
Miscellaneous (Subtotal)	\$54,372
<i>In Town Parking and Mileage</i>	\$1,605
<i>Employee Training</i>	\$2,819
<i>Conference Registration Fees</i>	\$1696
<i>Membership Dues</i>	\$31,891
<i>Employee Professional Dues/Licenses</i>	\$260
<i>Awards and Gifts</i>	\$16,066
<i>Other Miscellaneous Expenses</i>	\$35
Employee Travel	\$423
Total	\$54,920

The various categories listed above are generally defined as follows:

“Meals” includes expenses for meals taken with customers, vendors, or other employees at which specific Company business discussions take place or meals taken by the employee while away from his or her normal work location on a business day trip.

“Entertainment” includes expenses for outings with customers, clients, vendors, or others who are seeking to do business with the Company to clubs, theaters, or sporting events, *etc.* when a business discussion takes place immediately before, during, or immediately after the event.

“Miscellaneous Subtotal” includes other business-related expenses not specifically covered under another expense category. CenterPoint Energy has further divided this expense category into the following subcategories: in-town parking and mileage expenses, employee training expenses, conference registration fees, fees for membership in various organizations,⁷¹

⁷¹ In 2021, most expenses included in this subcategory represent fees for Company membership in the Association of Energy Services Professionals, Energy Solutions Center’s Industrial and Foodservice consortia, the Gas Technology Institute Emerging Technologies Program, and the Midwest Energy Efficiency Alliance.

employee professional dues and license fees, awards and gifts,⁷² and other miscellaneous expenses.

“Employee Travel” includes expenses incurred while on a business trip requiring an overnight stay, including items such as airfare, lodging, and travel meals for the employee.

CenterPoint Energy tracks CIP-related spending separately from other utility spending, using Federal Energy Regulatory Commission account numbers to ensure that conservation-related expenses are not recorded in non-conservation accounts and vice-versa. This in turn ensures ratepayers are not charged twice for a single expense; conservation expenses are approved through the annual CIP Tracker filings while non-conservation expenses are addressed in other proceedings (e.g., utility rate cases). The CIP-related expenses are incorporated into the Company’s CIP BenCost analysis through their inclusion in the Company’s total CIP spending for 2021.

⁷² CenterPoint Energy incentivizes its customer service representatives to promote CIP by providing gift cards to call center employees who refer commercial and industrial customers to CIP offerings. The majority of expenses included in the 2021 awards and gifts subcategory are gift cards provided through this incentive program.

CenterPoint Energy Minnesota Gas

CIP Tracker and Balance

2021 Actuals

CCRC interim rate (Jan-May) approved in the 2019 rate case (Docket No. G-008/GR-19-524)

CCRC final rate (June-Dec) approved in the 2019 rate case (Docket No. G-008/GR-19-524)

Approved CCRA rate (Jan-Nov) of \$0.0591/Dth (Docket No. G-008/M-20-455)

Approved CCRA rate (Dec) of \$0.0791/Dth (Docket No. G-008/M-21-328)

	Jan 21 Actual	Feb 21 Actual	Mar 21 Actual	Apr 21 Actual	May 21 Actual	June 21 Actual	July 21 Actual	Aug 21 Actual	Sept 21 Actual	Oct 21 Actual	Nov 21 Actual	Dec 21 Actual	Annual Summary
Expenses													
1 Beginning Tracker Balance (\$) - Under / (Over) Recovered	1,952,441	(5,833,603)	(10,555,101)	(14,952,659)	(14,999,756)	(14,903,070)	(13,645,220)	(12,359,712)	(8,750,108)	(6,185,187)	5,478,053	6,045,378	1,952,441
2 CIP Program Expenditures	(1,161,767)	2,613,136	2,661,151	3,863,053	2,899,478	2,702,922	2,513,223	2,919,991	3,806,663	3,092,717	3,278,534	10,380,329	39,569,431
3 Performance Incentive										9,935,723			9,935,723
4 Total Expenses & Incentive (Line 1 + Line 2 + Line 3)	790,674	(3,220,468)	(7,893,950)	(11,089,606)	(12,100,278)	(12,200,148)	(11,131,997)	(9,439,721)	(4,943,445)	6,843,254	8,756,587	16,425,706	51,457,595
Recovery													
5 Total Volumes (Dt)	25,357,349	27,348,199	24,848,610	14,456,876	10,957,312	7,055,581	6,376,609	7,058,453	7,348,567	7,191,209	13,050,092	20,335,219	171,384,076
6 Exemptions (Dt)	3,098,115	2,716,805	1,161,341	1,360,317	1,585,139	1,406,025	2,269,141	3,093,112	3,176,218	2,569,018	3,883,558	3,372,798	29,691,585
7 Volumes Less Exemptions (Dt) (Line 5 - Line 6)	22,259,234	24,631,394	23,687,269	13,096,559	9,372,173	5,649,557	4,107,468	3,965,342	4,172,349	4,622,191	9,166,534	16,962,421	141,692,491
8 Base Rate Recovery (CCRC) (per Dt)	0.2382	0.2382	0.2382	0.2382	0.2382	0.2372	0.2372	0.2372	0.2372	0.2372	0.2372	0.2372	
9 Base Rate Cost Recovery (\$) (Line 7 x Line 8)	(5,302,150)	(5,867,198)	(5,642,308)	(3,119,600)	(2,232,452)	(1,340,075)	(974,291)	(940,579)	(989,681)	(1,096,384)	(2,174,302)	(4,023,486)	(33,702,505)
10 Adjustment for final CCRC rate implementation	-	-	-	-	-	240,644	-	-	-	-	-	-	240,644
11 Net CCRC Recovery (Line 9 + Line 10)	(5,302,150)	(5,867,198)	(5,642,308)	(3,119,600)	(2,232,452)	(1,099,430)	(974,291)	(940,579)	(989,681)	(1,096,384)	(2,174,302)	(4,023,486)	(33,461,861)
12 CCRA (per Dt)	0.0591	0.0591	0.0591	0.0591	0.0591	0.0591	0.0591	0.0591	0.0591	0.0591	0.0591	0.0791	
13 Base Rate Cost Recovery (\$) (Line 7 x Line 12)	(1,315,521)	(1,455,715)	(1,399,918)	(774,007)	(553,895)	(333,889)	(242,751)	(234,352)	(246,586)	(273,171)	(541,742)	(1,341,728)	(8,713,275)
14 Adjustments to CCRA Recovery	-	-	-	-	-	-	-	-	-	-	-	95,148	95,148
15 Net CCRA Recovery (\$) (Line 13 x Line 14)	(1,315,521)	(1,455,715)	(1,399,918)	(774,007)	(553,895)	(333,889)	(242,751)	(234,352)	(246,586)	(273,171)	(541,742)	(1,246,580)	(8,618,127)
16 Adjustment to CIP Recovery	-	-	-	-	-	-	-	1,872,178	-	-	-	-	
17 Total Recovery (Lines 11 + Line 15+ Line 16)	(6,617,670)	(7,322,913)	(7,042,225)	(3,893,607)	(2,786,347)	(1,433,319)	(1,217,043)	697,247	(1,236,267)	(1,369,555)	(2,716,044)	(5,270,066)	(40,207,810)
Carrying Charges													
18 Sub-Balance (\$) (Line 4 + Line 17)	(5,826,996)	(10,543,381)	(14,936,175)	(14,983,213)	(14,886,625)	(13,633,467)	(12,349,039)	(8,742,474)	(6,179,712)	5,473,698	6,040,544	11,155,640	11,249,785
19 Deferred Income Tax [(Line 18 - Line 1) x 28.742%]	2,235,966	1,353,684	1,259,208	8,782	(32,516)	(364,909)	(372,548)	(1,039,667)	(738,783)	(3,350,997)	(161,671)	(1,468,792)	
20 ADIT (Line 19 + Line 20 prior month)	1,482,175	2,835,859	4,095,068	4,103,849	4,071,333	3,706,424	3,333,876	2,294,209	1,555,426	(1,795,571)	(1,957,242)	(3,426,033)	
21 Net Investment (Line 18 + Line 20)	(4,344,821)	(7,707,522)	(10,841,107)	(10,879,363)	(10,815,291)	(9,927,043)	(9,015,164)	(6,448,264)	(4,624,286)	3,678,128	4,083,302	7,729,607	
22 Carrying Charge Rate	0.15%	0.15%	0.15%	0.15%	0.15%	0.12%	0.12%	0.12%	0.12%	0.12%	0.12%	0.12%	
23 Carrying Charge (Line 21 x Line 22)	(6,607)	(11,720)	(16,484)	(16,543)	(16,445)	(11,753)	(10,673)	(7,634)	(5,475)	4,355	4,834	9,151	(84,994)
24 Ending Tracker Balance - Under / (Over) Recovered (Line 18 + Line 23)	(5,833,603)	(10,555,101)	(14,952,659)	(14,999,756)	(14,903,070)	(13,645,220)	(12,359,712)	(8,750,108)	(6,185,187)	5,478,053	6,045,378	11,164,791	11,164,791

Notes on the CIP Tracker Report:

1. Line 1: January beginning balance is equal to the December 31, 2020 ending balance of \$1,952,441, approved in *In the Matter of CenterPoint Energy's 2021 Conservation Improvement Program (CIP) Cost Recovery*, Docket No. G-008/M-21-328, Ordering Point 2 (Oct. 22, 2021).
2. Line 2: CIP expenditures include all program expenses as well as all assessments made by the Department of Commerce under Minnesota Statute § 216B.241 and the NGEA.
3. Line 3: The Company's 2020 CIP Financial Incentive, approved in *In the Matter of CenterPoint Energy's 2021 Conservation Improvement Program (CIP) Cost Recovery*, Docket No. G-008/M-21-328, Ordering Point 1 (Oct. 22, 2021).
4. Line 8: The interim CCRC in the amount of \$0.2382 per Dth was implemented as a part of the 2019 rate case. *In the Matter of the Application by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G-008/GR-19-524, (Sept. 26, 2019) and went into effect January 1, 2020. The final CCRC in the amount of \$0.2372 per Dth was implemented as a part of the 2019 rate case settlement. *In the Matter of the Application by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas (CPE) for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G-008/GR-19-524, Ordering Point 2 (May 18, 2021).
5. Line 10: Upon implementation of the CCRC, the Company's CIP Tracker account was adjusted to account for final rates and the misalignment of the Company's billing cycle with the January 1, 2020 effective date of the interim CCRC. See Exhibit A.
6. Line 12: The CCRA in the amount of \$0.0591 per Dth was implemented October 1, 2020 pursuant to *In the Matter of CenterPoint Energy's 2019 Conservation Improvement Program (CIP) Cost Recovery*, Docket No. G-008/M-20-455, Ordering Point 4 (Aug. 18, 2020). The CCRA in the amount of \$0.791 per Dth was implemented December 1, 2021 pursuant to *In the Matter of CenterPoint Energy's 2021 Conservation Improvement Program (CIP) Cost Recovery*, Docket No. G-008/M-21-328, Ordering Point 3 (Oct. 22, 2021).
7. Line 14 (Dec.): Upon implementation of the current CCRA, the Company's CIP Tracker account was adjusted to account for the misalignment of the Company's billing cycle with the December 1, 2020 effective date of the new CCRA.
8. Line 16 (Aug.): The revenue collected from two CIP Exempt customers was incorrectly allocated to the CIP accounts despite the customers being CIP exempt. To correct this error, total CIP recovery was reduced by \$1,872,178 in August as calculated in Exhibit B.
9. Line 20: ADIT in each month is calculated based on monthly deferred income tax and the previous months ADIT.
10. Line 22: From January through May the short-term debt interest factor (1.84%) used to calculate carrying charges is a monthly factor calculated from the annual rates specified in the 2017 rate case from *In the Matter of the Application of CenterPoint Energy Resource Corp. d/b/a CenterPoint Energy Minnesota Gas, for Authority to Increase Rates for Natural Gas Utility Service in Minnesota*, PUC Docket No. G-008/GR-17-285, Findings of Fact, Conclusions of Law, and Recommendation to Approve the Settlement (Mar. 23, 2018). From June through December the short-term debt interest factor (1.43%) used to calculate carrying charges is a monthly factor calculated from the annual rates specified in the 2019 rate case from *In the Matter of the Application of CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, for Authority to Increase Rates for Natural Gas Utility Service in Minnesota*, Docket No. G-008/GR-19-524, Findings of Fact,

Conclusions of Law, and Recommendation to Approve the Parties' Settlements, pp. 15 (Nov. 20, 2020). As approved by the Commission *In the Matter of the Application by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas (CPE) for Authority to Increase Natural Gas Utility Service in Minnesota*, Docket No. G-008/GR-19-524, Order (Mar. 1, 2021).

Carrying Charges

The calculation of carrying charges in the 2021 CIP Tracker for January through May is based on the short-term debt interest factor used in the 2017 rate case settlement.⁷³ The calculation of carrying charges for June through December is based on the short-term interest factor used in the 2019 rate case settlement.⁷⁴

The 2021 year-end CIP Tracker under-recovered balance of \$11,164,791 includes \$84,994 in 2021 carrying charges in the customers' favor. The calculation of the monthly interest factors is shown below.

From January Through May:

$$\begin{aligned}\text{Annual Interest Factor} &= \text{Cost of Short-Term Debt} \\ &= 1.84\%\end{aligned}$$

$$\begin{aligned}\text{Monthly Interest Factor} &= ((1 + \text{Annual Interest Factor}) ^ (1/12)) - 1 \\ &= ((1 + 0.0184) ^ (1/12)) - 1 \\ &= 0.0015 \\ &= 0.15\%\end{aligned}$$

From June Through December:

$$\begin{aligned}\text{Annual Interest Factor} &= \text{Cost of Short-Term Debt} \\ &= 1.43\%\end{aligned}$$

$$\begin{aligned}\text{Monthly Interest Factor} &= ((1 + \text{Annual Interest Factor}) ^ (1/12)) - 1 \\ &= ((1 + 0.0143) ^ (1/12)) - 1 \\ &= 0.0012 \\ &= 0.12\%\end{aligned}$$

⁷³ *In the Matter of the Application of CenterPoint Energy Resource Corp. d/b/a CenterPoint Energy Minnesota Gas, for Authority to Increase Rates for Natural Gas Utility Service in Minnesota*, PUC Docket No. G-008/GR-17-285, Findings of Fact, Conclusions of Law, and Recommendation to Approve the Settlement (Mar. 23, 2018).

⁷⁴ *In the Matter of the Application of CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, for Authority to Increase Rates for Natural Gas Utility Service in Minnesota*, Docket No. G-008/GR-19-524, Findings of Fact, Conclusions of Law, and Recommendation to Approve the Parties' Settlements, pp. 15 (Nov. 20, 2020). As approved by the Commission *In the Matter of the Application by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas (CPE) for Authority to Increase Natural Gas Utility Service in Minnesota*, Docket No. G-008/GR-19-524, Order (Mar. 1, 2021).

SECTION 4: CONSERVATION COST RECOVERY ADJUSTMENT PROPOSAL

Overview

On October 22, 2021, the Minnesota Public Utilities Commission (“Commission”) approved the request of CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, (“CenterPoint Energy” or the “Company”) to implement the Conservation Cost Recovery Adjustment (“CCRA”) in the amount of \$0.0791 per dekatherm (“Dth”), which went into effect on December 1, 2021.⁷⁵ The purpose of the CCRA is to allow the Company to recover approved Conservation Improvement Program (“CIP”) expenses not recovered through the Conservation Cost Recovery Charge (“CCRC”), which is included in base rates. The Commission has required CenterPoint Energy to file its requests to modify the CCRA along with its CIP Tracker and Financial Incentive filings on May 1 of each year.⁷⁶

With this filing, CenterPoint Energy proposes to increase the CCRA to \$0.0905 per Dth beginning October 1, 2022. This rate is designed to reduce the CIP Tracker balance as close to zero as possible by the end of 2023. In the event that Commission approval of the proposed adjustment is delayed beyond September 16, 2022 (in order to implement the rate change by October 1), the Company will continue to apply the current CIP Adjustment of \$0.0791 per Dth up to the first of the month following Commission approval of a revised factor. In this case, the Company may recalculate the CCRA.

Projection Assumptions

To evaluate a new CCRA proposal, CenterPoint Energy projected CIP spending and recovery for 2022 and 2023. Projections for 2022 and 2023 can be found in Attachments C-1 and C-2. On November 25, 2020, the Department approved the Company’s *2021-2023 CIP Program Plan*.⁷⁷ Therefore for 2022-2023, CIP spending was based on the currently approved budget for 2022-2023, except for January through March in 2022, which reflect actual spending. Sales volumes are taken from the 2021 rate case,⁷⁸ again, except for January through March of 2022, which reflect actual volumes. The projections use the interim CCRC (\$0.2469 per Dth), from the

⁷⁵ *In the Matter of CenterPoint Energy’s 2021 Conservation Improvement Program (CIP) Cost Recovery*, Docket No. G-008/M-21-328, Ordering Point 3 (Oct. 22, 2021).

⁷⁶ *In the Matter of a Petition by CenterPoint Energy for Approval of its 2009 CIP Tracker Account and DSM Financial Incentive*, Docket No. G-008/M-10-416, G-008/M-10-634, Ordering Point 4 (Oct. 11, 2010).

⁷⁷ *In the Matter of CenterPoint Energy’s 2021-2023 Natural Gas CIP Triennial Plan*, Docket No. G-008/GR-20-478 et al., Deputy Commissioner Decision (Nov. 25, 2020). See the final version of the *2021-2023 CIP Plan* filed on January 20, 2021 as a *Compliance Filing*.

⁷⁸ *In the Matter of the Application by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G-008/GR-21-435, Schedule C-2 (Sept. 24, 2021)

2021 rate case,⁷⁹ which is in effect as of January 1, 2022. The Company calculated carrying charges using the settlement short-term debt interest factor (1.43%) from the Company's 2019 rate case for 2022 and 2023.⁸⁰

In the Company's projections for 2022, it is assumed the Company will receive the Financial Incentive requested in this filing. In the Company's projections for 2023, it is assumed the Company will receive a Financial Incentive determined by applying the mechanism approved by the Commission for the *2021-2023 Conservation Improvement Program Triennial Plan* to the Company's estimated net benefits for 2023.^{81 82}

The mechanism for the 2021-2023 triennium caps the Financial Incentive that a utility is eligible for to a specified percent of the utility's CIP spending or net program benefits based on the utility cost test, whichever incentive is lesser. The Company's 2023 projections (i.e., 2022 CIP performance) reflect an incentive of 10 percent of its estimated 2021 program net benefits of \$64,471,769. The incentive was rounded to \$6,400,000 for use in projections. The Company realizes the incentives may differ from these estimates depending on the performance of the Company's CIP in 2022, but the Company believes that assuming a financial incentive based on 10 percent of estimated net benefits for the 2022 plan is the best way to calculate the 2022 financial incentive in 2023.⁸³

All the projections referenced here are included in the Attachments Section of this filing.

Projection Results and Proposal

Projections for 2022 and 2023 (Attachments C-1 and C-2) show that an increase in the CCRA to 0.0905 per Dth taking effect on October 1, 2022 and remaining in effect through 2023 would achieve a near-zero CIP Tracker balance by the end of 2023.

CenterPoint Energy has in the past proposed to make modifications to the CCRA on October 1 of the year following the proposal and in prior years the Commission approved a CCRA

⁷⁹ *In the Matter of the Application by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G-008/GR-21-435, (Sept. 24, 2021).

⁸⁰ *In the Matter of the Application of CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, for Authority to Increase Rates for Natural Gas Utility Service in Minnesota*, Docket No. G-008/GR-19-524, Findings of Fact, Conclusions of Law, and Recommendation to Approve the Parties' Settlements, pp. 15 (Nov. 20, 2020). As approved by the Commission *In the Matter of the Application by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas (CPE) for Authority to Increase Natural Gas Utility Service in Minnesota*, Docket No. G-008/GR-19-524, Order (Mar. 1, 2021).

⁸¹ *In the Matter of Commission Review of Utility Performance Incentives for Energy Conservation Pursuant to Minn. Stat. § 216B.241, Subd. 2c*, Docket No. E,G-999/CI-08-133, Order Approving 2021–2023 Parameters for Shared Savings Demand-side Management Financial Incentive (Dec. 9, 2020).

⁸² *In the Matter of CenterPoint Energy's 2021-2023 Natural Gas CIP Triennial Plan*, Docket No. G-008/GR-20-478 et al., Deputy Commissioner Decision (Nov. 25, 2020).

⁸³ The projections show the financial incentives for each year in October. On an actual basis, the CIP Tracker will incorporate the incentive when it is approved by Commission Order.

modification for October 1.⁸⁴ The Company proposes to increase the CCRA to 0.0905 per Dth effective October 1, 2022 because an earlier increase to the CCRA will result in a smaller change in the CCRA for customers.

A revised proposed tariff page (based on approved tariffs) is included as Attachment E to this filing, and the Company proposes the following bill message:

The PUC has approved a Conservation Cost Recovery Adjustment (CCRA) factor of \$0.00905 per therm. This charge will be used to fund energy conservation activities and has been added to your delivery charge. For more information, please call or visit our website.

As approved in 2021,⁸⁵ a phone number and website address are not included in this bill message. If a customer has questions, the phone number and website address they should contact already appears near the bill message on the customer's bill.

⁸⁴ *In the Matter of CenterPoint Energy's 2020 Conservation Improvement Program (CIP) Cost Recovery*, Docket No. G-008/M-21-328, Ordering Point 4 (Oct. 22, 2021).

⁸⁵ *See Id.* 84, Ordering Point 4.

SECTION 5: ATTACHMENTS

Attachment A: DSM Financial Incentive Mechanism – 2021 Financial Incentive Calculations

Attachment B: Total Program Cost-Benefit Analysis without the Low-Income Segment

Attachment C-1: CIP Tracker and Balance Projections for 2022 with New CCRA Starting in October 2022

Attachment C-2: CIP Tracker and Balance Projections for 2023 with New CCRA Starting in October 2022

Attachment D: Detailed Energy Savings Information for Projects with Deemed Savings Measures

Attachment E: Revised Tariff Page

Attachment A: DSM Financial Incentive Mechanism – 2021 Financial Incentive Calculations

The following pages contain the worksheet used to calculate the requested 2021 Financial Incentive taken from the spreadsheet provided by the Minnesota Department of Commerce.

2021

CenterPoint Energy

Inputs		Location:
2017 Weather-Normalized Sales (Dth)	144,773,124	From Utility 2021-2023 Triennial CIP Filing, non-exempt customers
2018 Weather-Normalized Sales (Dth)	148,027,024	From Utility 2021-2023 Triennial CIP Filing, non-exempt customers
2019 Weather-Normalized Sales (Dth)	152,839,181	From Utility 2021-2023 Triennial CIP Filing, non-exempt customers
3-year Weather-Normalized Sales Average (Dth)	148,546,443	
1.0% Energy Savings	1,485,464	
Increase Energy Savings per 0.1% Increase in Achievement Level	148,546	
Approved CIP Budget	\$36,309,957	From Commissioner's Order approving 2017-2020 Triennial CIP Filing
Approved CIP Energy Savings Goal (Dth)	1,831,438	From Utility 2021-2023 Triennial CIP Filing.
Estimated Net Benefits at Energy Savings Goal	\$64,052,761	From Utility 2021-2023 Triennial CIP Filing.
Energy savings at 1.5% (Dth)	2,228,197	
Incentive Calibration		
Max Percent of Net Benefits Awarded	10.0%	maximum net benefits awarded
Max Percent of Expenditures Awarded	30.0%	
Earning Threshold	0.7%	
Achievement Level Where Net Benefits Cap Begins	1.2%	
Increase in Net Benefits Awarded Per 0.1% Increase in Achievement Level	7.5	% Points
Actual 2021 Achievements		
Expenditures	\$38,439,620	From 2021 Status Report
Energy Saved (first year Dth saved)	1,871,509	From 2021 Status Report
Net Benefits Achieved	\$77,715,201	From 2021 Status Report
Shared Savings Incentive Results		
Achievement Level	1.26%	
Percent of Net Benefits Awarded	10.0000%	
Financial Incentive Award	\$7,771,520	
Incentive/First Year Dth Saved \$	\$4.1525	
Incentive/Net Benefits	10.00%	
Incentive/CIP Expenditures	20.22%	

Estimated Incentive Levels by Achievement Level

Achievement Level (% of sales)	Energy Saved	Percent of Net Benefits Awarded	Estimated Net Benefits Achieved	Incentive Award	Average Incentive per unit Saved	Incremental Incentive Units Saved
0.0%	0	0.00%	\$0	\$0	\$0.000	-
0.1%	148,546	0.00%	\$5,195,268	\$0	\$0.000	\$0.000
0.2%	297,093	0.00%	\$10,390,536	\$0	\$0.000	\$0.000
0.3%	445,639	0.00%	\$15,585,804	\$0	\$0.000	\$0.000
0.4%	594,186	0.00%	\$20,781,071	\$0	\$0.000	\$0.000
0.5%	742,732	0.00%	\$25,976,339	\$0	\$0.000	\$0.000
0.6%	891,279	0.00%	\$31,171,607	\$0	\$0.000	\$0.000
0.7%	1,039,825	6.25%	\$36,366,875	\$2,272,930	\$2.186	\$15.301
0.8%	1,188,372	7.00%	\$41,562,143	\$2,909,350	\$2.448	\$4.284
0.9%	1,336,918	7.75%	\$46,757,411	\$3,623,699	\$2.710	\$4.809
1.0%	1,485,464	8.50%	\$51,952,678	\$4,415,978	\$2.973	\$5.334
1.1%	1,634,011	9.25%	\$57,147,946	\$5,286,185	\$3.235	\$5.858
1.2%	1,782,557	10.00%	\$62,343,214	\$6,234,321	\$3.497	\$6.383
1.3%	1,931,104	10.00%	\$67,538,482	\$6,753,848	\$3.497	\$3.497
1.4%	2,079,650	10.00%	\$72,733,750	\$7,273,375	\$3.497	\$3.497
1.5%	2,228,197	10.00%	\$77,929,018	\$7,792,902	\$3.497	\$3.497
1.6%	2,376,743	10.00%	\$83,124,285	\$8,312,429	\$3.497	\$3.497
1.7%	2,525,290	10.00%	\$88,319,553	\$8,831,955	\$3.497	\$3.497
1.8%	2,673,836	10.00%	\$93,514,821	\$9,351,482	\$3.497	\$3.497
1.9%	2,822,382	10.00%	\$98,710,089	\$9,871,009	\$3.497	\$3.497
2.0%	2,970,929	10.00%	\$103,905,357	\$10,390,536	\$3.497	\$3.497
2.1%	3,119,475	10.00%	\$109,100,625	\$10,910,062	\$3.497	\$3.497
2.2%	3,268,022	10.00%	\$114,295,892	\$11,429,589	\$3.497	\$3.497
2.3%	3,416,568	10.00%	\$119,491,160	\$11,949,116	\$3.497	\$3.497
2.4%	3,565,115	10.00%	\$124,686,428	\$12,468,643	\$3.497	\$3.497
2.5%	3,713,661	10.00%	\$129,881,696	\$12,988,170	\$3.497	\$3.497
2.6%	3,862,208	10.00%	\$135,076,964	\$13,507,696	\$3.497	\$3.497
2.7%	4,010,754	10.00%	\$140,272,232	\$14,027,223	\$3.497	\$3.497
2.8%	4,159,300	10.00%	\$145,467,499	\$14,546,750	\$3.497	\$3.497
2.9%	4,307,847	10.00%	\$150,662,767	\$15,066,277	\$3.497	\$3.497
3.0%	4,456,393	10.00%	\$155,858,035	\$15,585,804	\$3.497	\$3.497

Attachment B: Total Program Cost-Benefit Analysis without the Low-Income Segment

The BenCosts provided below include the cost-benefit analyses for the Company's total 2021 CIP goals and actual results excluding cost-ineffective low-income programs.¹

Conservation Improvement Program (CIP)				BENEFIT COST FOR GAS CIPS-- Cost-Effectiveness Analysis			
Company: CenterPoint Energy Project: CenterPoint Energy CIP 2021 Total Actual (Full Behavioral Savings)							
Input Data					First Year	Second Year	Third Year
1) Retail Rate (\$/MCF) =	\$6.21			16 Utility Project Costs			
Escalation Rate =	4.69%			16 a) Administrative & Operating Costs =	\$ 18,498,582		
2) Non-Gas Fuel Retail Rate (\$/Fuel Unit) =	\$0.000			16 b) Incentive Costs =	\$ 19,941,038		
Escalation Rate =	3.59%			16 c) Total Utility Project Costs =	\$ 38,439,620	\$ -	\$ -
Non-Gas Fuel Units (ie. kWh, Gallons, etc) =	kWh			17) Direct Participant Costs (\$/Part) =	218,878		
3) Commodity Cost (\$/MCF) =	\$3.25			18) Participant Non-Energy Costs (Annual \$/Part.) =	-	-	-
Escalation Rate =	4.69%			Escalation Rate =	2.16%	2.16%	2.16%
4) Demand Cost (\$/Unit/Yr) =	\$115.55			19) Participant Non-Energy Savings (Annual \$/Part) =	-	-	-
Escalation Rate =	4.69%			Escalation Rate =	2.16%	2.16%	2.16%
5) Peak Reduction Factor =	1.00%			20) Project Life (Years) =	11.351		
6) Variable O&M (\$/MCF) =	\$0.0500			21) Avg. MCF/Part. Saved =	7.452	#DIV/0!	#DIV/0!
Escalation Rate =	4.69%			22) Avg Non-Gas Fuel Units/Part. Saved =	0 kWh	0 kWh	0 kWh
7) Non-Gas Fuel Cost (\$/Fuel Unit) =	\$0.000			22a) Avg Additional Non-Gas Fuel Units/ Part. Used :	0 kWh	0 kWh	0 kWh
Escalation Rate =	3.59%			23) Number of Participants =	280,884	-	
8) Non-Gas Fuel Loss Factor	7.70%			24) Total Annual MCF Saved =	2,093,186	-	
9) Gas Environmental Damage Factor =	\$2.0700			25) Incentive/Participant =	\$70.99	#DIV/0!	#DIV/0!
Escalation Rate =	2.30%						
10) Non Gas Fuel Enviro. Damage Factor (\$/Unit)	\$0.0198						
Escalation Rate =	2.30%						
11) Participant Discount Rate =	3.02%						
12) Utility Discount Rate =	5.39%						
13) Societal Discount Rate =	3.02%						
14) General Input Data Year =	2020						
15a) Project Analysis Year 1 =	2021						
15b) Project Analysis Year 2 =	2022						
15c) Project Analysis Year 3 =	2023						
Cost Summary				Test Results	Triennial NPV	Triennial B/C	
Utility Cost per Participant =	136,852,294	#DIV/0!	#DIV/0!	Ratepayer Impact Measure Test	(\$82,895,701)	0.58	
Cost per Participant per MCF =	47,735,403	#DIV/0!	#DIV/0!	Utility Cost Test	\$74,536,729	2.94	
Lifetime Energy Reduction (MCF)	25,118,234			Societal Test	\$99,409,474	2.24	
Societal Cost per MCF	3,184,063,316			Participant Test	\$137,100,632	3.23	

¹ Behavioral energy savings are reported consistent with *In the Matter of Inclusion of Behavioral Project Savings in Energy Conservation Improvement Programs and Shared Savings Demand-Side Management Financial Incentive Calculations*, Docket No. E,G-999/CI-08-133, *et al.*, Deputy Commissioner Decision (DOC, Apr. 26, 2012). In accordance with the Average Savings Method, the full savings for behavioral programs are used for BenCost analyses; reduced savings are used elsewhere in the report. Alternative CIP project and CIP assessments are excluded from spending used in all BenCost modeling.

**Attachment C-1: CIP Tracker and Balance Projection for 2022 with New
CCRA Starting in October 2022**

CenterPoint Energy Minnesota Gas

CIP Tracker and Balance

2022 Forecast with New CCRA starting Oct 2022

2021 Forecast using 2021 rate case settlement volumes for Apr-Dec (Docket No. G-008/GR-21-435). Actuals for Jan-Mar.

CCRC interim rate (Jan-Dec) approved in the 2021 rate case (Docket No. G-008/GR-21-435)

Approved CCRA rate (Jan-Sept) of \$0.0791/Dth (Docket No. G-008/M-21-328)

CCRA (Oct-Dec) determined by 2023 year-end goal-seek to zero

		Jan 22	Feb 22	Mar 22	Apr 22	May 22	June 22	July 22	Aug 22	Sept 22	Oct 22	Nov 22	Dec 22	Annual Summary
	<u>Expenses</u>	<u>Actual</u>	<u>Actual</u>	<u>Actual</u>	<u>Forecast</u>	<u>Forecast</u>	<u>Forecast</u>	<u>Forecast</u>	<u>Forecast</u>	<u>Forecast</u>	<u>Forecast</u>	<u>Forecast</u>	<u>Forecast</u>	
1	Beginning Tracker Balance (\$) - Under / (Over) Recovered	11,164,791	2,279,905	(4,357,269)	(8,467,516)	(10,017,999)	(10,601,034)	(9,917,589)	(8,787,980)	(7,835,179)	(6,484,508)	2,310,095	1,537,689	11,164,791
2	CIP Program Expenditures	(540,778)	2,627,966	4,214,285	3,279,658	2,589,941	2,445,714	2,620,078	2,403,077	2,856,900	3,098,357	3,206,851	9,718,779	38,520,829
3	Performance Incentive	-	-	-	-	-	-	-	-	-	7,771,520	-	-	7,771,520
4	Total Expenses & Incentive (Line 1 + Line 2 + Line 3)	10,624,013	4,907,872	(142,984)	(5,187,858)	(7,428,058)	(8,155,320)	(7,297,511)	(6,384,903)	(4,978,279)	4,385,369	5,516,945	11,256,468	57,457,140
	<u>Recovery</u>													
5	Total Volumes (Dt)	28,721,502	31,653,180	28,068,605	17,547,230	12,228,297	8,875,276	8,599,225	7,983,297	7,109,704	8,707,568	14,382,635	21,937,710	195,814,230
6	Exemptions (Dt)	2,906,402	3,244,556	2,555,915	2,757,547	2,523,461	3,496,005	4,050,781	3,555,689	2,506,976	2,551,833	2,585,726	3,073,747	35,808,638
7	Volumes less Exemptions (Dt) (Line 5 - Line 6)	25,815,100	28,408,624	25,512,690	14,789,683	9,704,836	5,379,272	4,548,444	4,427,608	4,602,728	6,155,735	11,796,908	18,863,963	160,005,593
8	Base Interim Rate Recovery (CCRC) (per Dt)	0.2469	0.2469	0.2469	0.2469	0.2469	0.2469	0.2469	0.2469	0.2469	0.2469	0.2469	0.2469	
9	Adjustment for final CCRC rate implementation	69,950	-	-	-	-	-	-	-	-	-	-	-	69,950
10	CCRC Recovery (\$) (Line 7 x Line 8 + Line 9)	(6,303,799)	(7,014,089)	(6,299,083)	(3,651,573)	(2,396,124)	(1,328,142)	(1,123,011)	(1,093,176)	(1,136,414)	(1,519,851)	(2,912,657)	(4,657,512)	(39,435,431)
11	CCRA (per Dt)	0.0791	0.0791	0.0791	0.0791	0.0791	0.0791	0.0791	0.0791	0.0791	0.0905	0.0905	0.0905	
12	Base CCRA Recovery (\$) (Line 7 x Line 11)	(2,041,974)	(2,247,122)	(2,018,054)	(1,169,864)	(767,653)	(425,500)	(359,782)	(350,224)	(364,076)	(557,094)	(1,067,620)	(1,707,189)	(13,076,152)
13	Total Recovery (Line 10 + Line 12)	(8,345,773)	(9,261,212)	(8,317,137)	(4,821,437)	(3,163,777)	(1,753,643)	(1,482,793)	(1,443,400)	(1,500,489)	(2,076,945)	(3,980,277)	(6,364,701)	(52,511,583)
	<u>Carrying Charges</u>													
14	Sub-Balance (\$) (Line 4 + Line 13)	2,278,240	(4,353,340)	(8,460,121)	(10,009,294)	(10,591,835)	(9,908,963)	(8,780,303)	(7,828,303)	(6,478,768)	2,308,424	1,536,668	4,891,767	4,945,557
15	Deferred Income Tax ([Line 14 - Line 1] x 28.742%)	2,554,172	1,906,527	1,179,242	443,138	164,932	(198,915)	(326,879)	(275,830)	(389,860)	(2,527,265)	222,298	(964,029)	
16	ADIT (Line 15 + Line 16 prior month)	(871,861)	1,034,666	2,213,908	2,657,046	2,821,978	2,623,063	2,296,184	2,020,354	1,630,494	(896,770)	(674,472)	(1,638,501)	
17	Net Investment (Line 14 + Line 16)	1,406,379	(3,318,673)	(6,246,213)	(7,352,248)	(7,769,857)	(7,285,900)	(6,484,119)	(5,807,949)	(4,848,274)	1,411,653	862,196	3,253,266	
18	Carrying Charge Rate	0.12%	0.12%	0.12%	0.12%	0.12%	0.12%	0.12%	0.12%	0.12%	0.12%	0.12%	0.12%	
19	Carrying Charge (Line 17 x Line 18)	1,665	(3,929)	(7,395)	(8,705)	(9,199)	(8,626)	(7,677)	(6,876)	(5,740)	1,671	1,021	3,852	(49,938)
20	Ending Tracker Balance - Under / (Over) Recovered (Line 14 + Line 19)	2,279,905	(4,357,269)	(8,467,516)	(10,017,999)	(10,601,034)	(9,917,589)	(8,787,980)	(7,835,179)	(6,484,508)	2,310,095	1,537,689	4,895,619	4,895,619

**Attachment C-2: CIP Tracker and Balance Projection for 2023 with New
CCRA Starting in October 2022**

CenterPoint Energy Minnesota Gas

CIP Tracker and Balance

2023 Forecast with New CCRA starting Oct 2022

2023 Forecast using 2021 rate case volumes (Docket No. G-008/GR-21-435)

CCRC interim rate (Jan-Dec) approved in the 2021 rate case (Docket No. G-008/GR-21-435)

CCRA determined by 2023 year-end goal-seek to zero

	Expenses	Jan 23 Forecast	Feb 23 Forecast	Mar 23 Forecast	Apr 23 Forecast	May 23 Forecast	June 23 Forecast	July 23 Forecast	Aug 23 Forecast	Sept 23 Forecast	Oct 23 Forecast	Nov 23 Forecast	Dec 23 Forecast	Annual Summary
1	Beginning Tracker Balance (\$) - Under / (Over) Recovered	4,895,619	(4,440,848)	(9,956,865)	(13,601,611)	(15,106,335)	(15,631,584)	(14,850,576)	(13,602,209)	(12,543,653)	(11,058,854)	(3,434,058)	(3,997,344)	4,895,619
2	CIP Program Expenditures	(776,149)	2,715,812	3,431,736	3,498,331	2,762,626	2,608,783	2,794,773	2,563,304	3,047,385	3,304,941	3,420,669	10,366,782	39,738,992
3	Performance Incentive	-	-	-	-	-	-	-	-	-	6,400,000	-	-	6,400,000
4	Total Expenses & Incentive (Line 1 + Line 2 + Line 3)	4,119,470	(1,725,036)	(6,525,129)	(10,103,280)	(12,343,709)	(13,022,801)	(12,055,803)	(11,038,906)	(9,496,268)	(1,353,912)	(13,390)	6,369,438	51,034,611
	Recovery													
5	Total Volumes (Dt)	29,050,831	27,849,515	24,590,872	17,547,230	12,228,297	8,875,276	8,599,225	7,983,297	7,109,704	8,707,568	14,382,635	21,937,710	188,862,161
6	Exemptions (Dt)	3,691,313	3,477,371	3,652,107	2,757,547	2,523,461	3,496,005	4,050,781	3,555,689	2,506,976	2,551,833	2,585,726	3,073,747	37,922,557
7	Volumes less Exemptions (Dt) (Line 5 - Line 6)	25,359,518	24,372,144	20,938,764	14,789,683	9,704,836	5,379,272	4,548,444	4,427,608	4,602,728	6,155,735	11,796,908	18,863,963	150,939,604
8	Base Interim Rate Recovery (CCRC) (per Dt)	0.2469	0.2469	0.2469	0.2469	0.2469	0.2469	0.2469	0.2469	0.2469	0.2469	0.2469	0.2469	
9	Base Rate Cost Recovery (\$) (Line 7 x Line 8)	(6,261,265)	(6,017,482)	(5,169,781)	(3,651,573)	(2,396,124)	(1,328,142)	(1,123,011)	(1,093,176)	(1,136,414)	(1,519,851)	(2,912,657)	(4,657,512)	(37,266,988)
10	CCRA (per Dt)	0.0905	0.0905	0.0905	0.0905	0.0905	0.0905	0.0905	0.0905	0.0905	0.0905	0.0905	0.0905	
11	CCRA Recovery (\$) (Line 7 x Line 10)	(2,295,036)	(2,205,679)	(1,894,958)	(1,338,466)	(878,288)	(486,824)	(411,634)	(400,698)	(416,547)	(557,094)	(1,067,620)	(1,707,189)	(13,660,033)
12	Total Recovery (Line 9 + Line 11)	(8,556,301)	(8,223,161)	(7,064,739)	(4,990,039)	(3,274,412)	(1,814,966)	(1,534,645)	(1,493,874)	(1,552,961)	(2,076,945)	(3,980,277)	(6,364,701)	(50,927,021)
	Carrying Charges													
13	Sub-Balance (\$) (Line 4 + Line 12)	(4,436,831)	(9,948,197)	(13,589,868)	(15,093,319)	(15,618,121)	(14,837,767)	(13,590,448)	(12,532,780)	(11,049,229)	(3,430,857)	(3,993,667)	4,737	107,590
14	Deferred Income Tax ((Line 13 - Line 1) x 28.742%)	2,682,333	1,582,922	1,044,198	428,747	147,097	(228,159)	(362,186)	(307,375)	(429,527)	(2,192,439)	160,843	(1,150,278)	
15	ADIT (Line 14 + Line 15 prior month)	1,043,832	2,626,754	3,670,952	4,099,698	4,246,796	4,018,637	3,656,451	3,349,076	2,919,548	727,110	887,952	(262,326)	
16	Net Investment (Line 13 + Line 15)	(3,392,999)	(7,321,443)	(9,918,916)	(10,993,621)	(11,371,325)	(10,819,130)	(9,933,997)	(9,183,704)	(8,129,680)	(2,703,748)	(3,105,715)	(257,589)	
17	Carrying Charge Rate	0.12%	0.12%	0.12%	0.12%	0.12%	0.12%	0.12%	0.12%	0.12%	0.12%	0.12%	0.12%	
18	Carrying Charge (Line 16 x Line 17)	(4,017)	(8,668)	(11,743)	(13,016)	(13,463)	(12,809)	(11,761)	(10,873)	(9,625)	(3,201)	(3,677)	(305)	(103,158)
19	Ending Tracker Balance - Under / (Over) Recovered (Line 13 + Line 18)	(4,440,848)	(9,956,865)	(13,601,611)	(15,106,335)	(15,631,584)	(14,850,576)	(13,602,209)	(12,543,653)	(11,058,854)	(3,434,058)	(3,997,344)	4,432	4,432

Attachment D: Detailed Energy Savings Information for Projects with Deemed Savings Measures

This attachment provides additional information about certain measures rebated in 2021. Where the savings Dth/unit for a measure is listed as N/A, the Company does not claim a deemed savings amount for that measure. For example, for residential insulation measures, such as air sealing, the Company claims energy savings on the basis of the change in R-value observed at the participating home. Similarly, the Company claims “deemed calculated” energy savings for many commercial measures; This means that the Company uses a formula to calculate energy savings on the basis of certain customer-provided inputs. For example, the energy savings claimed for a process boiler depends on the boiler’s efficiency and British thermal unit (“Btu”) per hour input as provided by the customer.

Project and Measure Name	Quantity	Measure Life	Participant Cost	Savings Dth/Unit	Total Dth Savings
Residential Market Segment					
Home Efficiency Rebates					
92% AFUE furnace	362	20	\$637	13.49	4,883
94% AFUE furnace	850	20	\$736	16.32	13,875
96% AFUE furnace	14,771	20	\$950	20.34	300,409
83.5% efficient boiler	658	20	\$1,445	3.93	2,585
91% efficient boiler	520	20	\$2,379	28.35	14,743
High-efficiency single package vertical unit	0	20	\$400	5.01	0
Tier 1 thermostat replacing manual	2,857	10	\$30	2.48	7,097
Tier 2 thermostat replacing manual	25	10	\$91	3.73	93
Tier 2 thermostat replacing tier 1	50	10	\$61	1.24	62
Tier 3 thermostat replacing manual	608	10	\$189	7.52	4,573
Tier 3 thermostat replacing tier 1	876	10	\$159	5.04	4,412
Tier 3 thermostat replacing tier 2	854	10	\$98	3.80	3,241
Tier 2 thermostat replacing unknown	100	10	\$130	3.73	373
Tier 3 thermostat replacing unknown	5,285	10	\$174	3.80	20,057
Hearth with electronic ignition	1,613	15	\$193	4.38	7,070
.64 UEF tank water heater (atmospheric)	82	15	\$88	1.80	148
.64 UEF tank water heater (power vent)	2,278	15	\$577	1.59	3,633
.68 UEF tank water heater (>55 Gallons, <75,000 Btu/hr)	0	15	\$814	0.00	0
88% thermal efficiency water heater (>75,000 Btu/hr, commercial water heater in residential application)	1	11	\$1,350	3.30	3
Indirect water heater	26	15	\$989	4.47	116
.87 UEF tankless water heater (replacing tank water heater)	356	20	\$1,097	5.83	2,076
.87 UEF tankless water heater (replacing tankless water heater)	247	20	\$400	1.98	490

Combo unit (.87 UEF tankless water heater + air handling unit)	0	20	\$1,833	22.67	0
ENERGY STAR clothes dryer	382	12	\$152	0.39	150
DIY Home Efficiency					
Low-flow (1.5 GPM) showerhead	15,126	10	N/A	1.46	22,123
Low-flow (1.5 GPM) kitchen aerator	5,996	10	N/A	0.35	2,082
Low-flow (0.5) bathroom aerator	9,396	10	N/A	0.30	2,849
6' feet of R-2 (at least) DHW pipe insulation	7,375	13	N/A	1.22	9,007
Rope caulk	3,981	1	N/A	0.10	379
EDPM weatherstripping	4,162	1	N/A	0.10	396
Outlet and switch gaskets	2,451	1	N/A	0.10	233
Window film	4,032	1	N/A	0.10	384
Water heater temperature card	5,500	2	N/A	0.21	1,180
Home Energy Squad					
Low-flow (1.5 GPM) showerhead	1,857	10	N/A	1.76	3,272
Low-flow (1.5 GPM) kitchen faucet aerator	239	10	N/A	0.56	134
Low-flow (1.0 GPM) bathroom faucet aerator	0	10	N/A	0.32	0
Low-flow (0.5 GPM) bathroom faucet aerator	1,829	10	N/A	0.49	894
Weatherstripping on doors	1,866	2	N/A	0.70	1,306
Weatherstripping on attic hatches	206	20	N/A	1.40	288
Tier 1 thermostat replacing manual	419	10	N/A	2.48	1,041
Tier 3 thermostat replacing manual	169	10	N/A	7.52	1,271
Tier 3 thermostat replacing Tier 1	302	10	N/A	5.04	1,521
Tier 3 thermostat replacing Tier 2	0	10	N/A	3.80	0
Water heater setback	417	2	N/A	0.86	358
6' feet of R-2 (at least) DHW pipe insulation	1,732	13	N/A	1.47	2,549
New Home Construction Rebates					
92% AFUE furnace	184	20	\$66	0.79	146
95% AFUE furnace	265	20	\$379	5.48	1,451
91% efficient boiler	59	20	\$2,379	30.64	1,808
High-efficiency single package vertical unit	0	20	\$400	5.01	0
Tier 2 thermostat replacing tier 1	4	10	\$61	1.24	5
Tier 3 thermostat replacing tier 1	753	10	\$159	5.04	3,793
Hearth with electronic ignition	4,677	15	\$193	4.38	20,499
.64 UEF tank water heater (power vent)	58	15	\$577	1.72	100
.68 UEF tank water heater (>55 Gallons, <75,000 Btu/hr)	0	15	\$814	0.00	0
88% thermal efficiency water heater (>75,000 Btu/hr, commercial water heater in residential application)	1	11	\$1,350	0.72	1
Indirect water heater	2	15	\$989	4.47	9
.87 UEF tankless water heater	3	20	\$400	2.01	6

Combo unit (.87 UEF tankless water heater + air handling unit)	0	20	\$779	7.06	0
ENERGY STAR clothes dryer	31	12	\$152	0.39	12
School Kits					
Low-flow (1.5 GPM) showerhead	15,042	10	N/A	0.54	8,054
Low-flow (1.5 GPM) kitchen faucet aerator	15,042	10	N/A	0.13	1,993
Low-flow (0.5 PGM) bathroom faucet aerator	15,042	10	N/A	0.13	1,907
Water heater setback	15,042	2	N/A	0.06	868
Low Income Market Segment					
Low Income Weatherization					
Weatherization	393	20	N/A	20.00	7,861
92% AFUE furnace	0	20	N/A	13.43	0
94% AFUE furnace	1	20	N/A	16.75	17
96% AFUE furnace	190	20	N/A	20.34	3,865
83.5% efficient boiler	0	20	N/A	3.87	0
91% efficient boiler	12	20	N/A	26.41	317
Tier 1 thermostat replacing manual	112	10	N/A	2.48	278
.64/.68 UEF tank water heater (atmospheric)	0	15	N/A	22.67	0
.64/.68 UEF tank water heater (power vent)	106	15	N/A	1.65	175
Indirect water heater	0	15	N/A	1.65	0
.87 UEF tankless water heater (replacing tank water heater)	0	20	N/A	4.47	0
Combi Units (.87 UEF tankless water heater + air handling unit)	0	20	N/A	4.85	0
Furnace tune-up	80	2	N/A	2.11	169
Boiler tune-up	9	2	N/A	3.03	27
Pipe Wrap	280	13	N/A	1.47	412
Water Heater Blankets	3	13	N/A	1.07	3
Low-Income Rental Efficiency					
Weatherization	18	20	N/A	33.38	601
92% AFUE Furnace	0	20	N/A	13.43	0
94% AFUE Furnace	0	20	N/A	16.75	0
96% AFUE Furnace	12	20	N/A	20.34	244
83.5% efficient boiler	4	20	N/A	3.87	15
91% efficient boiler	7	20	N/A	26.41	185
Furnace Tune-up/Repair	0	2	N/A	2.11	0
Boiler Tune-up/Repair	0	2	N/A	3.03	0
Tier 1 thermostat replacing manual	0	10	N/A	2.48	0
Combi Units (.87 UEF tankless water heater + air handling unit)	0	20	N/A	22.67	0
Health & Safety	17	0	N/A	-	0
.64/.68 UEF tank water heater (atmospheric)	0	15	N/A	1.65	0
.64/.68 UEF tank water heater (power vent)	13	15	N/A	1.65	21

Indirect water heater	0	15	N/A	4.47	0
Non-Profit Affordable Housing					
92% AFUE furnace (retrofit)	0	20	\$637	13.43	0
94% AFUE furnace (retrofit)	1	20	\$736	16.75	17
96% AFUE furnace (retrofit)	13	20	\$950	20.34	264
83.5% efficient boiler (retrofit)	0	20	\$1,445	3.87	0
91% efficient boiler (retrofit)	0	20	\$2,379	26.41	0
Tier 1 thermostat (retrofit) - replacing manual	8	10	\$30	2.48	20
Tier 2 thermostat (retrofit) - replacing manual	0	10	\$91	3.73	0
Tier 3 thermostat (retrofit) - replacing manual	1	10	\$189	7.52	8
Tier 2 thermostat (retrofit) - replacing tier 1	0	10	\$61	1.24	0
Tier 3 thermostat (retrofit) - replacing tier 1	0	10	\$159	5.04	0
Tier 3 thermostat (retrofit) - replacing tier 2	0	10	\$98	3.80	0
.64/.68 UEF tank water heater (atmospheric)	0	15	\$88	1.65	0
.64/.68 UEF tank water heater (power vent)	18	15	\$577	1.65	30
Indirect water heater (retrofit)	0	15	\$989	4.47	0
.87 UEF tankless water heater (replacing tank water heater)	0	20	\$1,097	4.85	0
Heat recovery ventilator (HRV)/ energy recovery ventilator (ERV) (retrofit)	0	15	\$980	9.11	0
Air sealing (retrofit)	18	20	\$1,817	8.45	152
Attic insulation (retrofit)	15	20	\$516	5.36	80
Wall insulation (retrofit)	6	20	\$2,877	34.14	205
Sill plate/rim joist (retrofit)	14	20	\$300	2.61	37
Low-flow (1.5 GPM) showerhead (retrofit)	9	10	\$12	1.76	16
Low-flow (1.5 GPM) kitchen faucet aerator (retrofit)	10	10	\$7	0.56	6
Low-flow (1.0 GPM) bathroom faucet aerator (retrofit)	9	10	\$7	0.32	3
ENERGY STAR clothes washer (retrofit)	2	11	\$163	0.17	0
ENERGY STAR clothes dryer (retrofit)	1	12	\$152	0.39	0
92% AFUE furnace (new construction)	0	20	\$66	1.00	0
95% AFUE furnace (new construction)	1	20	\$379	5.05	5
83.5% efficient boiler (new construction)	0	20	\$1,445	3.87	0
91% efficient boiler (new construction)	2	20	\$2,379	26.41	53
Tier 2 thermostat (new construction) - replacing tier 1	11	10	\$61	1.24	14
Tier 3 thermostat (new construction) - replacing tier 1	8	10	\$159	5.04	40
.64/.68 UEF tank - atmospheric (new construction)	0	15	\$88	1.65	0
.64/.68 UEF tank - power vent (new construction)	0	15	\$577	1.65	0

Indirect water heater (new construction)	2	15	\$989	4.47	9
.87 UEF tankless (new construction) (baseline tankless water heater)	0	20	\$400	0.94	0
Heat recovery ventilator (HRV)/ energy recovery ventilator (ERV) (new construction)	3	15	\$980	9.11	27
Above code air sealing (new construction)	2	20	\$1,817	5.53	11
Above code attic insulation (new construction)	2	20	\$516	0.65	1
Above code wall insulation (new construction)	3	20	\$2,877	2.39	7
Low-flow showerhead - 1.5 gpm (new construction)	12	10	\$12	1.76	21
Low- flow kitchen aerator - 1.5 gpm (new construction)	12	10	\$7	0.56	7
Low-flow bathroom aerator - 1.0 gpm (new construction)	12	10	\$7	0.32	4
ENERGY STAR clothes washer (new construction)	9	11	\$163	0.17	2
ENERGY STAR clothes dryer (new construction)	9	12	\$152	0.39	4
Performance Pathway Rebates	20	20	\$5,615	27.08	542
Low-Income Multifamily Rebate					
Commercial steam boiler	0	20	\$8,264	#DIV/0!	0
Turbulators for commercial boiler (hot water or steam)	0	20	\$1,375	#DIV/0!	0
Modulating burner replacement for commercial boiler (hot water or steam)	2	15	\$22,408	65.98	132
Stack damper for commercial boiler (hot water or steam)	0	5	\$3,609	#DIV/0!	0
Steam traps	2	6	\$120	49.96	100
Commercial water heater non-GAMA rated (88%+ thermal efficiency)	18	11	\$1,350	20.80	374
C&I high-efficiency hot water boiler (85% - 87.9% efficient); 100,000 - 12.5 million btu	0	20	\$2,757	#DIV/0!	0
C&I condensing efficiency hot water boiler (88%+ efficient); 100,000 - 12.5 million btu	9	20	\$9,719	403.17	3,629
Boiler tune-up	95	2	\$540	55.61	5,283
Boiler reset control	2	5	\$600	83.57	167
Boiler cutout control	2	5	\$141	37.39	75
Linkageless controls	2	15	\$11,337	65.98	132
CO garage sensors	0	15	\$1,006	#DIV/0!	0
Condensing unit heater	0	12	\$676	#DIV/0!	0
Infrared heaters	0	15	\$1,716	#DIV/0!	0
92% AFUE furnace	0	20	\$1,342	#DIV/0!	0
94% AFUE furnace	0	20	\$1,429	#DIV/0!	0
96% AFUE furnace	10	20	\$1,517	20.35	204

Commercial DCV - Retrofit	0	15	\$783	#DIV/0!	0
Process boiler	0	20	\$16,871	#DIV/0!	0
Stack economizer - process, conventional	0	15	\$31,403	#DIV/0!	0
Stack economizer - process, condensing	0	15	\$46,459	#DIV/0!	0
High-efficiency single package vertical unit	148	20	\$400	5.01	741
.64 UEF Tank Water Heater (<55 gallons; atmospheric)	0	11	\$577	#DIV/0!	0
.64 UEF Tank Water Heater (<55 gallons; power vent)	0	11	\$577	#DIV/0!	0
Industrial boiler/burner tune-up	0	2	\$1,809	#DIV/0!	0
Commercial pipe insulation - hydronic heat	3	15	\$3,548	48.74	146
Commercial pipe insulation - low pressure steam heat	0	15	\$837	#DIV/0!	0
Commercial pipe insulation - high pressure steam heat	0	15	\$1,104	#DIV/0!	0
Commercial pipe insulation - domestic hot water	0	15	\$881	#DIV/0!	0
Air curtains	0	15	\$8,000	#DIV/0!	0
Ozone/low temperature laundry	0	10	\$46,756	#DIV/0!	0
Green garage door hinge	0	20	\$340	#DIV/0!	0
Modulating clothes dryer	0	14	\$525	#DIV/0!	0
Hearth with electronic ignition	0	10	\$174	#DIV/0!	0
Smart thermostats	0	15	\$193	#DIV/0!	0
Broilers - infrared, upright	0	12	\$4,413	#DIV/0!	0
Charbroilers - infrared	1	12	\$2,173	23.72	24
Combi oven	0	12	\$3,822	#DIV/0!	0
Combi oven (CEW or ENERGY STAR®)	1	12	\$7,183	402.70	403
Convection oven	0	12	\$1,286	#DIV/0!	0
Conveyor broiler	0	12	\$3,146	#DIV/0!	0
Conveyor oven	0	12	\$2,230	#DIV/0!	0
Demand control ventilation - kitchen hood	1	15	\$0	89.77	90
Dishwasher - ENERGY STAR®, single, door, high temp	0	15	\$770	#DIV/0!	0
Dishwasher - ENERGY STAR®, single, conveyor, high temp	0	20	\$2,050	#DIV/0!	0
Dishwasher - ENERGY STAR®, multi, conveyor, high temp	0	20	\$970	#DIV/0!	0
Fryer - 50%	0	12	\$1,017	#DIV/0!	0
Fryer - 51-59%	0	12	\$1,017	#DIV/0!	0
Fryer - ≥60%	0	12	\$2,979	#DIV/0!	0
Griddle	0	12	\$571	#DIV/0!	0
Pasta cooker	0	12	\$2,413	#DIV/0!	0
Rotating rack oven	0	12	\$4,128	#DIV/0!	0

Rotisserie oven	0	12	\$2,665	#DIV/0!	0
Salamander broiler	0	12	\$1,006	#DIV/0!	0
Steamer equipment	0	12	\$2,901	#DIV/0!	0
C&I Market Segment					
Foodservice					
Broilers - infrared, upright	2	12	\$4,413	N/A*	208
Charbroilers - infrared	2	12	\$2,173	N/A*	142
Combi oven	10	12	\$3,822	276.84	2,768
Combi oven (CEW or ENERGY STAR®)	50	12	\$7,183	402.70	20,135
Convection oven	83	12	\$1,286	36.10	2,996
Conveyor broiler	1	12	\$3,146	193.28	193
Conveyor oven	3	12	\$2,230	88.43	265
Demand control ventilation - kitchen hood	80	15	\$8,602	76.96	6,157
Dishwasher - ENERGY STAR®, single, door, high temp	20	15	\$770	N/A*	588
Dishwasher - ENERGY STAR®, single, conveyor, high temp	13	20	\$2,050	N/A*	232
Dishwasher - ENERGY STAR®, multi, conveyor, high temp	0	20	\$970	N/A*	0
Fryer - 50%	6	12	\$1,017	70.70	424
Fryer - 51-59%	36	12	\$1,017	78.36	2,821
Fryer - ≥60%	30	12	\$2,979	81.10	2,433
Griddle	3	12	\$571	37.93	114
Pasta cooker	13	12	\$2,413	N/A*	1,377
Rotating rack oven	6	12	\$4,128	211.34	1,268
Rotisserie oven	1	12	\$2,665	N/A*	133
Salamander broiler	7	12	\$1,006	N/A*	212
Steamer equipment	10	12	\$2,901	370.70	3,707
C&I Heating and Water Heating					
Commercial steam boiler	6	20	\$8,264	N/A*	2,362
Turbulators for commercial boiler (hot water or steam)	5	20	\$1,375	N/A*	596
Modulating burner replacement for commercial boiler (hot water or steam)	17	15	\$22,408	N/A*	4,375
Stack damper for commercial boiler (hot water or steam)	27	5	\$3,609	N/A*	1,866
Steam traps	3,027	6	\$120	N/A*	289,252
Commercial water heater non-GAMA rated (88%+ thermal efficiency)	170	11	\$1,350	N/A*	3,799
C&I high-efficiency hot water boiler (85% - 87.9% efficient); 100,000 - 12.5 million btu	17	20	\$2,757	N/A*	402
C&I condensing efficiency hot water boiler (88%+ efficient); 100,000 - 12.5 million btu	225	20	\$9,719	N/A*	66,769

Boiler tune-up	1,707	2	\$540	N/A*	113,001
Boiler reset control	36	5	\$600	N/A*	1,394
Boiler cutout control	38	5	\$141	N/A*	893
Linkageless controls	5	15	\$11,337	N/A*	1,008
CO garage sensors	115	15	\$1,006	N/A*	11,170
Condensing unit heater	50	12	\$676	N/A*	454
Infrared heaters	27	15	\$1,716	N/A*	543
92% AFUE furnace	25	20	\$1,342	N/A*	476
94% AFUE furnace	45	20	\$1,429	N/A*	1,056
96% AFUE furnace	585	20	\$1,517	N/A*	9,268
Commercial DCV - Retrofit	27	15	\$783	N/A*	3,506
Process boiler	1	20	\$16,871	N/A*	385
Stack economizer - process, conventional	0	15	\$31,403	N/A*	0
Stack economizer - process, condensing	1	15	\$46,459	N/A*	1,147
High-efficiency single package vertical unit	17	20	\$400	5.01	85
.64 UEF Tank Water Heater (<55 gallons; atmospheric)	1	11	\$577	N/A*	8
.64 UEF Tank Water Heater (<55 gallons; power vent)	6	11	\$577	N/A*	81
Industrial boiler/burner tune-up	119	2	\$1,809	N/A*	102,537
Commercial pipe insulation - hydronic heat	47	15	\$3,548	N/A*	3,898
Commercial pipe insulation - low pressure steam heat	1	15	\$837	N/A*	991
Commercial pipe insulation - high pressure steam heat	5	15	\$1,104	N/A*	927
Commercial pipe insulation - domestic hot water	9	15	\$881	N/A*	601
Air curtains	0	15	\$8,000	N/A*	0
Ozone/low temperature laundry	8	10	\$46,756	N/A*	35,245
Green garage door hinge	0	20	\$340	N/A*	0
Modulating clothes dryer	0	14	\$525	N/A*	0
Hearth with electronic ignition	28	10	\$174	N/A*	123
Smart thermostats	327	15	\$193	N/A*	907
Audit Services					
Low-flow 1.0 GPM bathroom faucet aerator	0	10	N/A	1.15	0
Low-flow (0.5 GPM) bathroom faucet aerator	603	10	N/A	1.78	10,711
Low-flow (1.5 GPM) kitchen faucet aerator	62	10	N/A	0.57	354
Low-flow (1.5 GPM) showerhead	270	10	N/A	1.17	3,159
Commercial Programmable Thermostat	28	8	N/A	9.64	2,158
Scheduling of existing programmable thermostat	490	8	N/A	10.37	40,657
Commercial Weatherstripping	514	11	N/A	4.87	27,512

Hot water temp adjustment (multi-family only)	5	2	N/A	25.94	259
Multifamily					
Low-Flow (1.5 GPM) Showerhead (DI Measure)	2,181	10	N/A	2.07	4,506
Low-Flow (1.5 GPM) Kitchen Faucet Aerator (DI Measure)	1,212	10	N/A	0.56	674
Low-Flow (0.5 GPM) Bathroom Faucet Aerator (DI Measure)	3,026	10	N/A	0.47	1,408
Hot Water Temp Adjustment (DI Measure)	5	2	N/A	25.94	130
Door Weatherization (DI Measure)	84	11	N/A	5.45	458
Low-Flow (1.5 GPM) Showerhead (Renter Kit)	0	10	N/A	2.07	0
Low-Flow (1.5 GPM) Kitchen Faucet Aerator (Renter Kit)	0	10	N/A	0.56	0
Low-Flow (1.0 GPM) Bathroom Faucet Aerator (Renter Kit)	0	10	N/A	0.30	0
Window Film (Renter Kit)	0	1	N/A	0.10	0
Commercial Smart (Tier 3) Thermostats	171	10	N/A	3.53	603
Air Conditioner Covers	0	10	N/A	0.37	0

Attachment E: Revised Tariff Page

CenterPoint Energy attaches a revised tariff page reflecting the Conservation Cost Recovery Adjustment ("CCRA") it proposed in Section 4 of this filing. Tariff page revisions were made relative to the currently approved tariff page and not any other proposed, but unapproved tariff pages.

CONSERVATION IMPROVEMENT PROGRAM ADJUSTMENT RIDER**Applicability:**

Applicable to bills for gas and/or transportation service provided under the Company's retail rate schedules.

Exemptions are as follows:

"Large Energy Facility", as defined in Minn. Stat. 216B.2421 customers shall receive a monthly exemption from conservation improvement program (CIP) charges pursuant to Minn. Stat. 216B.16, subd. 6b Energy Conservation Improvement. Upon exemption from conservation program charges, the "Large Energy Facility" customers can no longer participate in any utility's Energy Conservation Improvement Program.

"Large Customer Facility" customers that have been exempted from the Company's CIP charges pursuant to Minn. Stat. 216B.241, subd. 1a (b) shall receive a monthly exemption from CIP charges pursuant to Minn. Stat. 216B.16, subd. 6b Energy Conservation Improvement. Such monthly exemption will be effective beginning January 1 of the year following the grant of exemption. Upon exemption from the conservation program charges, the "Large Customer Facility" customers can no longer participate in CenterPoint Energy's Energy Conservation Improvement Program.

Minnesota Stat. 216B.241, subd. 1a(c) which allows exemption of certain commercial gas customers does not apply to CenterPoint Energy because the Company's customer count exceeds the 600,000 level set in statute.

Rate:

Base Charge Per Therm (CCRC)	Adjustment (CCRA)
\$0.02469	\$0.00 79 ⁹⁰⁵

Interim Surcharge

Effective January 1, 2022, customers' bills will be increased on an interim basis by 12.0% on the monthly basic charge and the delivery charge per therm. Any sales tax and franchise fees will be calculated on the increased bill. If the total amount of the rate increase approved at the end of the rate case (Docket G-008/GR-21-435) is lower than the total amount of the interim rates collected, the Company will refund the difference with interest, and if the total amount of the final rates are higher than the total amount of interim rates, the Company will not charge the customer for the difference.

Rider:

A Conservation Improvement Program Adjustment which shall be included on each non-exempt customer's monthly bill. The applicable factor shall be multiplied by the customer's monthly billing in Therms for gas service before any adjustments, surcharges or sales tax.

Determination of Conservation Cost Recovery Charge (CCRC or Base Charge per Therm):

The CCRC is the amount included in base rates dedicated to the recovery of CIP costs as approved by the Minnesota Public Utilities Commission in the Company's last general rate case. The CCRC is approved and applied on a per therm basis by dividing test-year CIP expenses by the test-year sales volumes (net of CIP-exempt volumes). All revenue received from the CCRC shall be credited to the CIP tracker account.

CERTIFICATE OF SERVICE

Marty Kapsh served the above *Compliance Filing* of CenterPoint Energy to all persons at the addresses indicated on the attached list by having the document delivered by electronic filing.

/s/

Marty Kapsch
Regulatory Analyst, Conservation Improvement Program
CenterPoint Energy

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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