

August 8, 2022

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

RE: **Supplemental Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G008/M-21-377

Dear Mr. Seuffert:

On May 31, 2022, the Minnesota Public Utilities Commission (Commission) issued a *Notice of Supplemental Comments* seeking comments on CenterPoint Energy Company's (CPE or the Company) request for a Tariff On-Bill (TOB) Pilot Program.

Attached are the supplemental comments of the Minnesota Department of Commerce, Division of Energy Resources (Department). The Department continues to recommend that the Commission deny the Petition, and is available to answer any questions the Commission may have.

Sincerely,

/s/ DANIELLE WINNER
Rates Analyst

DW/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. G008/M-21-377

I. BACKGROUND INFORMATION

On March 1, 2021, the Minnesota Public Commission (Commission) issued its *Order Accepting and Adopting Agreement Setting Rates, and Initiating Development of Conservation Programs for Renters*. In that *Order*, the Commission directed CenterPoint Energy (CPE or the Company) and the City of Minneapolis (City) to file a Pilot Program to provide Tariff on Bill Financing (TOBF) for the provision of energy efficiency measures to low-income rental customers.

On September 1, 2021, CPE and the City of Minneapolis filed a TOBF Pilot Program (Petition).

On February 4, 2022, parties filed initial comments on the TOBF Pilot.

On May 13, 2022, parties filed reply comments on the TOBF Pilot.

On May 31, 2022, the Minnesota Public Utilities Commission issued a *Notice of Supplemental Comment Period* seeking comments on CPE's modifications to the proposed TOBF pilot. Specifically, the Commission sought comment on:

1. Do CenterPoint and the City's Table and Exhibits A-Q in their May 13, 2022 Reply Comments include and accurately reflect your comments on the original TOBF pilot program petition?
2. If you support approval of a TOBF pilot program, please specify which already-proposed modifications and/or any additional modifications to the petition are needed before you would recommend the Commission approve the TOBF pilot program?
3. Identify your final recommendations or decision options for the Commission.
4. Are there other issues or concerns related to this matter?

II. SUMMARY OF CPE's MODIFIED TOBF PILOT PROGRAM

In initial comments, parties to the proceeding raised a number of concerns with the proposed Pilot including the scope of the proposal, the rate of return, the use of deferred accounting, the estimated cost/benefit analysis, co-payments and fees assessed to participants, the cost of the program, disconnection of customers for non-payment of the TOBF portion of their bill, and consumer protections.

A. SUMMARY OF MODIFICATIONS TO THE TOBF PROPOSAL

In its reply comments, CPE offered a scaled down version of its original proposal and addressed a number of concerns raised by parties. Initially, CPE proposed enrolling up to 500 participants per year for the three years of the Pilot. CPE has scaled participation back to between a total of 250-500 participants. In addition, the Company proposed to eliminate upfront payments and fees from participation, and to recover these costs as part of the utility Operations and Maintenance expense (O&M).

The Company proposed to earn its rate of return on its expenditures for energy efficiency upgrades with participants paying 2.5 percent and the balance being paid by ratepayers. In its modified proposal, CPE continued to use its rate of return, but stated it will explore options for obtaining lower cost third party financing.

Other modifications included:

- Eliminate disconnection for non-payment of TOBF fees;
- Establish methods for directing income-qualifying customers to no-cost CIP and Weatherization Assistance Program services; and
- Use of existing utility systems to reduce startup costs.

III. DEPARTMENT ANALYSIS

A. EXISTING CIP PROCEDURES AND CIP COST RECOVERY

The establishment of Conservation Improvement Program (CIP)¹ programs typically unfolds thusly. In its triennial filing, a utility proposes new or modified CIP programs to add it its CIP portfolio. The deemed savings of these programs are calculated based on the Department's Technical Reference Manual (TRM). The Department's CIP engineering staff reviews the costs and benefits of such programs, identifies the need for each program within the broader utility CIP portfolio, and suggests program modifications if necessary. Ultimately, the final decision of CIP program approval rests with the Department's Deputy Commissioner.² Once this approval is granted, the utility implements the program and subsequently reports on it through its annual CIP Status Reports. CIP Status Reports

¹ When referring to CIP as a singular program administered by the Department of Commerce, the Department refers simply to CIP, but when referring to individual conservation programs within a utility's CIP portfolio, the Department refers to "CIP programs." While this is redundant, it is common in the CIP operational sphere.

² See MN Statute 216B.241, [Subd. 1c](#) and [Subd. 2](#) for more information on the Department's CIP approval and reporting processes.

detail the spending and savings achievements of each CIP program in the utility's CIP portfolio; they are reviewed by the Department's CIP staff and approved by the Department's Deputy Commissioner.

Financing of CIP programs, by contrast, happens at the Commission. Once a utility establishes a CIP portfolio and incurs or expects to incur CIP costs within the test year, the utility proposes a Conservation Cost Recovery Charge (CCRC) in a rate case. This CCRC is "built into" base rates and does not occur as a separate line item on a customer's bill; it is only changed during a rate case proceeding. However, to account for fluctuations in CIP expenses, incentives, and recoveries year to year, especially if CIP programs grow after base rates are established, the utility may also petition the Commission for an additional CIP charge, often called a Conservation Cost Recovery Adjustment (CCRA), CIP Rider, or CIP Adjustment Factor (CAF).³ Unlike the CCRC, the CCRA is not built into base rates and is generally shown as a separate line item on a customer's bill. Also unlike the CCRC, the CCRA generally changes year-to-year with the utility's request for a CIP financial incentive and CIP tracker approval. Both the CCRC and the CCRA are charged to all CIP-eligible customers within a utility's service territory, and both are approved by the Commission.

When approving both the CCRC and CCRA, the Commission uses the CIP spending achievements figure approved by the Department's Deputy Commissioner; in doing so, the Commission essentially defers to the expertise of the Deputy Commissioner as to whether the program spending is appropriate or not. The Commission simply authorizes recovery of that amount and sets rates at the appropriate level.

Crucially, in both the CCRC and CCRA, the Commission treats CIP expenses essentially as an O&M expense to be recovered on a one-to-one basis. In other words, *no* CIP investments are added to rate base or are considered capital expenditures, with two exceptions noted below. This is because CIP investments are typically not owned by the utility; if they are physical assets, they are owned by either the customer or customer's landlord. Since CIP investments are not added to rate base, CIP investments do not earn a rate of return and are ineligible for deferred accounting.

The Department is aware of two exceptions in which utilities have been permitted to earn a rate of return on CIP expenditures; while neither instance explicitly uses deferred accounting, each has similarities to the use of deferred accounting. The first is in the case of Electric Utility Infrastructure (EUI), which are CIP investments at a utility's facilities, often designed to improve the supply-side efficiencies of those facilities.⁴ Although these investments are part of a utility's CIP portfolio, they are permitted to be recovered through the EUI Rider⁵ rather than the CCRC/CCRA. This is because the structure of the EUI Rider is built around the understanding that these investments will eventually be added to the utility's rate base during a rate case proceeding, at which time the EUI Rider is reset to zero. By contrast, again, the CCRA is simply a pass-through rider than permits utilities to recover

³ See [MN Statute 216B.241, Subd. 2b](#) for more information on the CCRA.

⁴ See [MN Statute 216B.1636, Subd. 1](#) for more information on EUI.

⁵ See [MN Statute 216B.1636, Subd. 2](#) for more information on the EUI Rider.

approved CIP costs on a one-to-one basis. Thus, EUI investments, which are utility-owned assets counting towards the utility's CIP portfolio, earn a rate of return in the EUI Rider; the EUI Rider renders the use of deferred accounting unnecessary.

The second instance in which a utility has been permitted to earn a rate of return on CIP investments is in the case of Otter Tail Power's (Otter Tail) Street and Area Lighting program.⁶ This program was initially developed in conjunction with the Department's CIP engineering staff and approved by the Department's Deputy Commissioner as part of Otter Tail's CIP portfolio. After Otter Tail began accruing costs, Otter Tail sought and received cost recovery from the Commission. In that instance, the costs incurred replaced utility-owned capital assets (street and area lights), but these assets were neither lighting utility property nor considered a supply-side resource, thus rendering them ineligible for recovery through the EUI Rider.⁷ Since the lights would depreciate until they could eventually be rolled into rate base, and as a reward for pursuing a statewide capital-intensive efficiency program without guarantee of expedited recovery, the Commission permitted Otter Tail to recover the undepreciated balance of the old lights and to earn a return on the incremental cost of the new lights through the CIP rider for five years.⁸ Deferred accounting was not requested, but would not have been necessary due to the rate of return earned on the new lights.

Succinctly put, under the existing CIP structure, CIP programs and portfolios are reviewed by Department's CIP staff and approved by the Department's Deputy Commissioner. CIP financial incentives, cost recovery, and rate design are reviewed by the Department's Regulation and Planning staff and approved by the Commission. These roles are defined by Minnesota Statute. In some specific instances in the past, the Commission has permitted utilities to earn a rate of return on CIP investments.

B. DEPARTMENT CONCERNS: AGENCY BOUNDARIES AND CONSERVATION PROGRAM ADMINISTRATION

From the Department's perspective, the proposed TOBF Pilot's fundamental flaw is that it has not been proposed through the state's existing CIP process. It has not been reviewed or evaluated by the Department's CIP staff, nor has it been approved by the Department's Deputy Commissioner. For the program to be part of the Company's CIP portfolio, it would need to, by statute, go through this route.

It appears to the Department, therefore, that neither CenterPoint nor the City intend for this to be a CIP program. Instead, it would be a conservation program that would exist in parallel to the suite of existing CIP. However, the Department believes that establishing an entirely separate conservation program process within the state is inappropriate. If allowed, this would create a disjointed process where utilities are allowed to bypass CIP and create CIP-like programs through the Commission,

⁶ See Docket E017/M-17-152 for Otter Tail Power's Street and Area Lighting Program.

⁷ With the possible exception of some 200 lights used to illuminate Otter Tail plants.

⁸ See Commission's [December 13, 2017 Order](#) in Docket E017/M-17-152.

eliminating the ability of the Department's CIP staff to evaluate the totality of conservation programs offered in Minnesota. This would be serious under any circumstance, but especially serious as the Department's CIP staff is currently implementing new standards and programs under the recently passed ECO Act.

The Department identifies the following concerns that have implications regarding agency boundaries and conservation program administration roles:

- First, while the TOBF Pilot may not directly infringe upon the statutory authority of the Department's Deputy Commissioner, it would certainly undermine that role's ability to direct the state's CIP;
- Second, it would be hard for the Commission to adequately judge the necessity of such a parallel conservation program, or how it interacts within the broader world of CIP programs, since it would exist in a wholly separate track;
- Third, it is unclear to the Department why this particular conservation program should receive special treatment and step outside of the normal process. When the Department asked CPE why the TOBF Pilot hadn't been proposed to the Department's CIP staff, the Company responded that it has to do with the fact that it involves individual customer meters and accounts. This is an unsatisfactory answer from the Department's perspective, as approval from the Department's Deputy Commissioner would not prevent the Commission from later approving a rate that involves individual meters or accounts;
- Fourth, it is unclear what would prevent other utilities from simply going to the Commission every time they wanted to create a new CIP program or got any pushback from the Department concerning a new CIP program;
- Fifth, the Commission would need to develop new expertise concerning all elements of conservation program design, including outreach, savings measurement, cost effectiveness evaluation, and installation verification and quality assurance, all of which are already performed by the Department;
- Sixth, these duplications of roles and expertise would likely cost both taxpayers and ratepayers more than if CIP program development and design remained at the Department;
- Seventh, there are many CIP vendors in the state who rely on the relative stability of CIP. Creating a new conservation program track could create both uncertainty and confusion for those vendors;

- Eighth, it would potentially create confusion if a customer wants to participate both in TOBF and in an existing CIP program, as different parties would administer and/or have the final word on any disputes;
- Finally, the Department continues to have legal concerns with the proposed TOBF Pilot. Specifically, the Department set out its concerns that the TOBF does not qualify as a utility “service” eligible for recovery in “rates” under Minn. Stat. §216B.16. Subd. 6, nor does it qualify as a CIP program. The Department will not repeat its legal concerns in these supplemental comments, but refers the Commission to its Initial Brief and Reply Brief in CPE’s 2019 rate case⁹ and to its February 4, 2022 comments in this proceeding.

While the Department attempted to find ways throughout this proceeding to modify the program and make it acceptable, when looking at all of the above considerations, the Department believes the risk of unintended consequences is too great for the program to be approved. For the above reasons, the Department concludes that the Commission should reject the proposal outright. These administrative and procedural concerns are the Department’s cardinal concerns; all other program-specific concerns are secondary.

C. DEPARTMENT CONCERNS: PROGRAMMATIC ELEMENTS OF TOBF PILOT

If the Commission decides to move forward with the Petition, the proposed Pilot would operate wholly outside of the CIP process. This means that savings could not be counted towards CIP goals, program costs would be ineligible for recovery through either the CCRC or CCRA, and costs and net benefits would also be ineligible to be counted towards the CIP financial incentive. All elements of program design, including outreach, savings measurement, cost effectiveness evaluation, and quality assurance would fall to the Commission. Thus, the Department offers the following program feedback, should the Commission move forward with the proposal.

1. Necessity

The Department is skeptical that such a program is necessary. As detailed in its initial comments, there is significant overlap between the TOBF Pilot and CPE’s existing CIP programs. The Department appreciates the Company’s statement that it will establish pathways to ensure that income-qualifying customers are directed to no-cost or low-cost CIP programs, and the Weatherization Assistance Program. However, the recent passage of the Energy Conservation and Optimization Act (ECO Act) more than doubles the CIP low-income spending requirement for all Investor-Owned Utilities and will result in an increase in CIP low-income spending requirements.

⁹ *In the Matter of the Application by CenterPoint Energy Resources Corporate d/b/a CenterPoint Energy Minnesota Gas for Authority to Increase Natural Gas Rates in Minnesota*, Initial Brief of the Minnesota Department of Commerce at 5, Docket No. G008/GR-19-524, October 7, 2020.

There is also CenterPoint's expanded eligibility for certain low-income CIP programs, specifically to rental properties in Minneapolis Green Zones and Areas of Concentrated Poverty. Due to these eligibility expansions, a portion of the customers targeted for the TOBF Pilot will be covered by CIP programs, and those CIP programs would be lower cost to both participants and ratepayers.

At minimum, the Department suggests that if the Commission wishes to pursue the TOBF Pilot, the Commission should wait until stakeholders have a better understanding of how CIP programs will be expanded under the ECO Act requirements.

2. Financing

The Department continues to object to a number of financing components of the Pilot.

In a number of low-income conservation programs, including ones administered by CPE, the cost of installing energy efficiency measures is shared between the Company and the property owner. In contrast, the TOBF Pilot targets renters—including future tenants—to pay the cost of the program and does not require a financial contribution from the property owner. The elimination of upfront co-payments and fees may be completely appropriate for low-income customers; however, the Department remains concerned with the lack of a financial contribution from property owners in rental situations. Upfront costs previously assessed to participants will be recovered from all CPE ratepayers, without any financial contribution from property owners who will receive the benefit of energy efficiency upgrades to their property, and who may have the financial means to assume some of the costs.

Further, although CPE states it will continue to explore third party financing, the Company offers no assurance that lower cost financing will be available. The TOBF Pilot is proposed to be offered throughout CPE's serving territory; however, the Company has worked extensively with the City of Minneapolis to address the City's goals regarding the energy efficiency of housing stock. Given the Pilot's specific focus on customers within Minneapolis (the proposal specifically targets customers within the City's Green Zones), the Department is unclear why the City of Minneapolis is not offering some financing to support the Pilot.

Finally, CPE continues to request a rate of return and deferred accounting in the TOBF Pilot. In Section A above ("Existing CIP Procedures and CIP Cost Recovery"), the Department outlined the different ways that conservation expenditures are recovered, as well as exceptions to these rules. Unlike in the cases of Electric Utility Infrastructure or in Otter Tail's Company-Owned Street and Area Lighting, where a rate of return is or was applied to a utility's own capital assets, CPE is proposing to earn its rate of return on assets that it will not own. Furthermore, the Company's request for deferred accounting does not meet the criteria generally relied on in granting use of deferred accounting, including costs that are unusual, unforeseeable, and large enough to have a significant impact on the utility's financial condition. The impact on CPE's financial condition is likely to be smaller given the proposed limitation

on the size of the Pilot. Further, even in the exceptional cases in which the Commission approved a rate of return on CIP expenditures, deferred accounting was not granted.

If, despite the Department's recommendation to deny CenterPoint's request for a Tariff On-Bill Financing Pilot, the Commission should approve it, the Department recommends the Commission at a minimum limit deferred accounting to true net incremental costs and not allow any labor costs (both CenterPoint's and outside service costs) since a representative level of labor costs is reflected in the base rates of CenterPoint's current rate case proceeding. This is consistent with past Commission decisions including most recently in Xcel's Load Flexibility Pilot Program in Docket No. E002/M-21-101.

IV. DEPARTMENT RECOMMENDATIONS

The Department appreciates CenterPoint's and the City's efforts to address certain concerns with modifications to the proposed TOBF Pilot. Improving outreach and conservation program access to low-income households, both homeowners and renters, is a laudable goal. Specifically, the Department agrees that smaller participation goals, utilization of existing systems to provide the Pilot, and the elimination of disconnection for non-payment of the TOBF payment are reasonable.

However, as noted, the proposed modifications do not begin to address the Department's primary concern, which is that CenterPoint and the City of Minneapolis did not propose the program within the existing CIP process. For the program to be part of the Company's CIP portfolio, it would need to, by statute, go through this route. The Department's CIP staff is more than willing to work with CPE and the City to address community conservation needs outlined in the Petition, either through the establishment of a new program or through the redesign of an existing one. Once a program has been established or modified, CPE and the City could return to the Commission at a later date to seek cost recovery and/or rate approval.

The Department further notes that CPE and the City do not appear to have explored other potential options for pursuing this program, such as presenting the proposal to the Minneapolis City Council and requesting matching financing. Aside from TOBF Pilot being proposed directly through CIP, the Department presumes that the City of Minneapolis could create a grant program directly for landlords interested in conservation improvements. Thus, the rejection of this program would not mean an end of such projects, it would merely direct them to more appropriate venues.

The Department concludes that should the Commission approve the TOBF Petition, this would create a conservation program track wholly separate from the existing CIP process. This would undermine the Department's authority as the director of the state's Conservation Improvement Program, would duplicate efforts and potentially increase both taxes and rates, and create uncertainty for stakeholders. For these reasons, the Department continues to recommend rejection of the proposed TOBF Pilot.

Should the Commission consider moving forward with a Pilot, the Department recommends it defer its decision until a clearer picture of CIP program changes resulting from the ECO Act are known.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Supplemental Comments**

Docket No. G008/M-21-377

Dated this 8th day of **August 2022**

/s/Sharon Ferguson

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