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October 23, 2023

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

VIA ELECTRONIC FILING

Re: Minnesota Energy Resources Corporation (MERC) Comments on the Proposal for Modifications to the Shared Savings DSM Financial Incentive Mechanism for Implementation Beginning in 2024
Docket No. U999/CI-08-133

Dear Mr. Seuffert:

On September 13, 2023, the Minnesota Public Utilities Commission (the "Commission") issued a Notice of Comment Period ("Notice") requesting comments on whether the Commission should approve modifications to the existing Conservation Improvement Program ("CIP") Shared Savings Demand-Side Management ("DSM") Financial Incentive Mechanism (the "Incentive Mechanism") for implementation beginning in 2024 as proposed in the Department of Commerce, Division of Energy Resources' (the "Department's") September 1, 2023, Comments.[1] In particular, the Commission's Notice requested comments on whether the Department's proposed modifications to the 2024-2026 Shared Savings DSM Incentive Mechanism serve the public interest and whether there are any other issues or concerns related to this matter. Minnesota Energy Resources Corporation ("MERC" or the "Company") submits these Comments in response to the Commission's Notice.

MERC appreciates the opportunity to provide comments on this important matter. The Incentive Mechanism is a critical component of MERC's planning and implementation decisions, guiding the Company's efforts to maximize cost-effective energy savings while also ensuring access to CIP across all the communities we serve.

Ultimately, the Department's proposal seeks to reduce the financial incentive award by adjusting two key parameters of the current Incentive Mechanism. In particular, the Department proposes to reduce the Net Benefits Cap from 10% to 3.4% and to reduce the Expenditures Cap from 30% to 15%. Contrary to the Department's conclusion that under the proposed modifications "*some utilities see a slight decrease in their incentives, whereas others see a slight increase*,"[2] the Department's proposal is expected to result in a *significant* reduction to MERC's incentive. Based on the Department's analysis, MERC's incentive is expected to be reduced by nearly half

[1] On October 6, 2023, the Commission issued a Notice of Extended Comment Period setting a revised deadline for initial comments of October 23, 2023.
[2] Department Comments at 24 (Sept. 1, 2023).

(47 percent) compared to the 2020-2022 incentive mechanism.[3] If implemented as proposed, the impacts of the Department's recommended modifications would be substantial and would reflect a departure from the Commission's historical practice of implementing gradual changes to the Incentive Mechanism over time. As noted by the Department, over the past decade (2012-2022), overall financial incentives have been reduced by approximately 50 percent as a result of modifications made to the Incentive Mechanism.[4] The Department now proposes modifications that would result in similar reductions over *a single year* for MERC.

The central argument of the Department's proposal is that *"first-year energy savings have been increasing even though incentives have been declining both in aggregate terms, as well as in terms of incentives awarded per unit of first-year energy savings. Moreover, Minnesota's incentives awarded are very generous compared to other states like Colorado, which themselves have one of the most generous financial incentive programs in the nation."*[5] Throughout the proposal, the Department elaborates on this position, citing research, analyses, and other information in support of its conclusions and recommendations.

As discussed in these comments, MERC has significant concerns with the Department's conclusions and recommendations, including the following:

- **The Department's proposal does not account for unique differences across Minnesota Utilities.** The Department's proposal adopts a "one-size-fits-all" approach which does not take into account the unique characteristics and differences among each utility's customer base and service territory. While this approach is consistent with recent Incentive Mechanisms established by the Commission, in order to fully promote the important policy objectives intended to be served by the Incentive Mechanism such as ensuring all Minnesota utility customers have access to energy efficiency, the Commission should evaluate whether this approach continues to be the most reasonable. MERC serves approximately 248,000 natural gas customers across 179 communities scattered across multiple regions of the state. MERC's service territory is distinctive from every other utility in the state of Minnesota in its geographic diversity and associated challenges.

- **The Department's proposal does not follow past Commission practice and policy objectives.** The Department's proposal is inconsistent with the Commission's practice of gradually implementing changes to the Incentive Mechanism to allow time to evaluate the impact of those changes and avoid any unintended consequences. The Department's proposal does not further the policy objectives of the CIP incentive and may undermine the legislative purpose of encouraging *increased* energy conservation. The Department's proposal focuses on the impact of the Incentive Mechanism on first-

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[3] Department Comments at 25-26 (Sept. 1, 2023). The Department projects that CenterPoint Energy's incentive will be reduced by approximately 11 percent and Xcel Energy's gas incentive will increase by 33 percent.
[4] Department Comments at 6 (Sept. 1, 2023). MERC's CIP financial incentive was approximately 54% lower in 2022 compared to 2012.
[5] Department Comments at 21 (Sept. 1, 2023).

year savings achievements and, therefore, does not adequately address the Commission's request to evaluate alternatives that incorporate lifetime savings.

- **The Department's proposal is based on the incorrect premise that Minnesota performance incentives are too generous.** The Department's proposal relies on a comparison of Minnesota utilities' performance incentives against utilities in other states but does not account for the different state regulatory environments. Further, the Department's analysis does not take into account for the low cost of energy efficiency in Minnesota relative to other states or relative to alternative resources.

In light of these considerations, which are discussed in greater detail below, the Company proposes an alternative Incentive Mechanism for the 2024-2026 CIP triennial which would ensure modifications to the incentive mechanism are implemented gradually to allow time to process the effects of such changes while recognizing the benefit the CIP incentive provides in promoting conservation as a low-cost preferred resource.

Specifically, MERC proposes a Net Benefits Cap of not less than 5%.

Unique Characteristics and Considerations Relevant to MERC

MERC has a unique service territory that sets it apart from other utilities in the state of Minnesota. MERC serves approximately 248,000 natural gas customers across 179 communities scattered across multiple regions of the state. MERC's service territory is distinctive from every other utility in the state of Minnesota in its geographic diversity and the challenges associated with serving a vast and varied landscape. In light of these unique characteristics, MERC requests the Commission consider applying a modified Incentive Mechanism that differs from a statewide utility Incentive Mechanism.

A key feature of MERC's service territory is its extensive coverage, which spans urban, suburban, and rural areas. While many utilities primarily serve densely populated urban centers, MERC's commitment to reaching outlying communities underscores its dedication to ensuring that customers across various demographics have access to energy efficiency programs. This diversity in MERC's customer base presents unique implementation challenges, as MERC must address the needs of both very small towns and larger cities. Serving such a vast geographic area also increases the cost of energy efficiency, as MERC, its contractors, and its partners need to travel significant distances to serve customers.

While MERC does serve urban populations, only 5 of the 179 communities MERC serves have a population greater than 20,000 according to the 2020 census. The vast majority of communities MERC serves are rural and rural households are likely to have lower incomes than their urban counterparts.[6] Approximately 5% of MERC's residential customers receive Low Income Home Energy Assistance Program ("LIHEAP") assistance. It is important to note that this represents the number of low-income households that have applied for and receive

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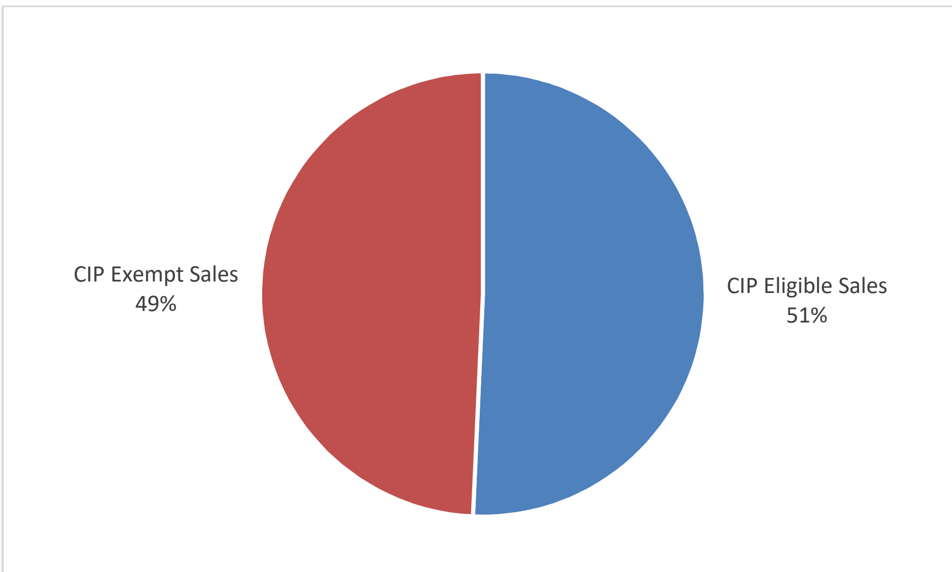
[6] https://www.census.gov/library/stories/2017/11/income-poverty-rural-america.html

assistance from program, but does not include customers that could potentially qualify for assistance but who have not applied for LIHEAP.

Furthermore, a large portion of MERC's customers are exempt from CIP programs, which narrows the addressable market for cost-effective energy savings among the customers MERC serves. The figure below shows the breakdown of MERC's CIP-exempt weather-normalized energy sales.

Figure 1. MERC CIP-Exempt Sales Summary, 2024-2026



As shown in Figure 1, CIP-exempt sales account for nearly half of all of MERC's weather-normalized sales. CIP-exempt sales grew from 47% of total sales for the 2021-2023 CIP Triennial period to 49% of total sales for the 2024-2026 CIP Triennial period. During the same timeframe, net weather-normalized sales decreased by about 0.4%. The large portion of CIP-exempt sales makes it more challenging for MERC to achieve cost-effective savings.

The current and proposed shared-savings demand-side management incentive mechanisms apply a one-size-fits all incentive framework to Minnesota's investor-owned utilities. The incentive mechanism does not account for differences between utilities that impact the ability to achieve energy efficiency savings goals and maximize incentives.

While MERC has outlined an alternative Incentive Mechanism proposal in these Comments which could be applied uniformly across the Minnesota utilities, alternatively, in light of the unique characteristics relevant to MERC, the Commission could establish a differential net benefits cap to be applied to MERC. The Commission has previously established a utility-specific net benefits cap based on considerations of the circumstances affecting specific utilities.[7]

<u>The Department's proposal does not adequately follow past Commission practice and policy objectives</u>

As the Commission has recognized in establishing previous iterations of the Incentive Mechanism, while allowing CIP cost recovery may reduce a utility's disincentive to reduce energy sales via conservation, it does not affirmatively encourage the practice of promoting conservation.[8] To that end, the Legislature authorized the Commission to approve a system of financial incentives to promote conservation under Minn. Stat. § 216B.16, subdivision 6c. The purpose of the Incentive Mechanism is to reduce the financial losses that a utility incurs when conservation programs succeed and thus reduce the amount of energy the utility sells. The Incentive Mechanism is designed to serve the public interest by encouraging utilities to actively promote conservation through CIP.

In establishing the Incentive Mechanism, Minn. Stat. §216B.16, subd. 6c directs the Commission to consider (1) whether the plan is likely to *increase* utility investment in cost-effective energy conservation; (2) whether the plan is compatible with the interest of utility ratepayers and other interested parties; (3) whether the plan links the incentive to the utility's performance in achieving cost-effective conservation; and (4) whether the plan is in conflict with other provisions of this chapter.

In the past, the Department has recommended, and the Commission has adopted, a policy of making any changes to the CIP incentive net benefits and expenditures caps gradually to enable utilities to adjust to the changes and to avoid unintended negative impacts to CIP investments and savings achievements.[9]

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[7] *See In the Matter of Modifications to Minnesota Power's Shared Savings DSM Financial Incentive Mechanism*, Docket No. E,G999/CI-08-133, Order (Nov. 19, 2013) (approving an incentive cap for Minnesota Power equal to 30 percent of net benefits instead of the 20 percent cap applied to other utilities because Minnesota Power sells a disproportionate share of its energy to CIP exempt customers.).

[8] *In the Matter of Modifications to Minnesota Power's Shared Savings DSM Financial Incentive Mechanism*, Docket No. E,G999/CI-08-133, Order Approving 2021-2023 Parameters for Shared Savings Demand-Side Management Financial Incentive at 3 (Dec. 9, 2020); Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan at 3-4 (Aug. 5, 2016).

[9] *In the Matter of Commission Review of Utility Performance Incentives for Energy Conservation Pursuant to Minn. Stat. §216B.241, Subd. 2c*, Docket No. E,G999/CI-08-133, Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan at 10, 23 (Aug. 5, 2016) ("To better enable utilities to adjust to this change, the Department recommends phasing the caps in gradually over three years. . . . [G]iven that the caps are expected to reduce the share of total conservation benefits that accrue to the utilities, the Commission finds it reasonable to phase them in so as to better enable utilities to adjust to the change."); *see also* Department Comments at 36 (June 11, 2020) ("The Department hopes that its proposal, with a 10 percent net benefits cap and a 30 percent CIP expenditures cap, will help IOUs ease into the lower incentive levels while also still providing a high incentive to achieve high

To ensure the CIP Incentive Mechanism continues to serve the public interest, the Commission should consider the policies the incentive aims to achieve for the benefit of Minnesota customers, including:

1. Achieving cost-effective energy savings. Cost-effective investments in conservation measures can help mitigate the need for additional utility investments, helping to keep rates lower for all customers.

2. Promoting and providing access to conservation programs across the communities served by Minnesota's utilities. The Commission should incentivize ensuring all non-exempt customers have access to CIP programs, regardless of whether they are located in rural out-state Minnesota or a more densely populated metropolitan area.

3. Recognizing that energy efficiency is still a lowest cost resource compared to other resources despite the cost of shareholder incentives in recent years.[10] Incentivizing even greater levels of utility investment in energy efficiency as a preferred resource can provide significant long-term benefits to customers.

4. Establishing an Incentive Mechanism that aligns the interests of utility shareholders and customers. The Incentive Mechanism should help utilities balance policy goals and business objectives in a way that is mutually beneficial to both customers and shareholders. Doing so will help encourage utilities to pursue measures with longer lifetimes, lower costs, and greater savings while striving to minimize implementation costs throughout the planning and implementation of CIP.

By reducing MERC's CIP incentive by nearly 50 percent in a single year, the Department's proposal does not align with these important policy considerations and will not serve the legislative purpose of encouraging increased energy conservation. As Minnesota Statute §216B.2401 prioritizes energy savings over all other types of energy resources, the incentive mechanism should be structured in a way that encourages further utility investments in energy efficiency, not less. This is especially true in light of the increasingly urgent need to reduce carbon emissions and address the impacts of climate change.

In making its recommended modifications to the CIP Incentive Mechanism, the Department observes that gas utilities that were paid a higher incentive over the period between 2006 and 2022 exhibited higher first-year savings. Nevertheless, the Department concludes this "*does not necessarily mean that decreasing the incentives paid to gas utilities will result in decreased energy savings.*"[11] The Department further concludes that savings achievement levels have

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energy savings, which may also incentivize the types of investment that will stimulate Minnesota's economy, which has been weakened due to the COVID-19 pandemic.").

[10] *In the Matter of Commission Review of Utility Performance Incentives for Energy Conservation Pursuant to Minn. Stat. §216B.241, Subd. 2c*, Docket No. E,G999/CI-08-133, Order Approving 2021-2023 Parameters for Shared Savings Demand-Side Management Financial Incentive at 5 (Dec. 9, 2020).

[11] Department Comments at 13 (Sept. 1, 2023).

increased over time despite a decrease in the overall utility incentive amount, suggesting that the utility incentive is too high and that the net benefits cap in place should be lowered.

MERC believes that the proposed changes to the Incentive Mechanism will significantly alter the business case for CIP investments going forward. Decreasing the Net Benefits Cap to 3.4% would lower the potential benefits of rewarding customers to install measures with longer lifecycle savings, which may be more costly to the program but deliver greater long term benefits to customers. Limiting the utility share of net benefits will also discourage utilities from pursuing innovative program design and offerings related to new technologies.

The proposed reduction of the net benefits cap also runs contrary to the Commission's request to incorporate lifetime savings into the Incentive Mechanism. On December 9, 2020, the Commission approved the present Incentive Mechanism and requested that the Department evaluate ways of improving the Incentive Mechanism structure to incorporate lifetime energy savings. The Department states that their proposal addresses this request since the proposed Incentive Mechanism uses the MN Test to calculate Net Benefits, which uses a lower discount rate compared to the Utility Cost Test. While it is true that a lower discount rate will increase Net Benefits, the reduced cap offsets this in the Incentive Mechanism. In order to encourage increased utility investment in longer life measures with greater lifetime benefits, the net benefits cap should be set at a level that encourages utilities to pursue measures with lifetime benefits. MERC proposes an alternative Net Benefits Cap that further encourages utilities to pursue longer life measures through CIP investments.

Minnesota's Incentive Mechanism Compared to Other States

The Department points out that, on average, Minnesota performance incentives per first-year dekatherm savings are higher than other states, particularly those that ranked highly in the 2022 ACEEE State Scorecard.

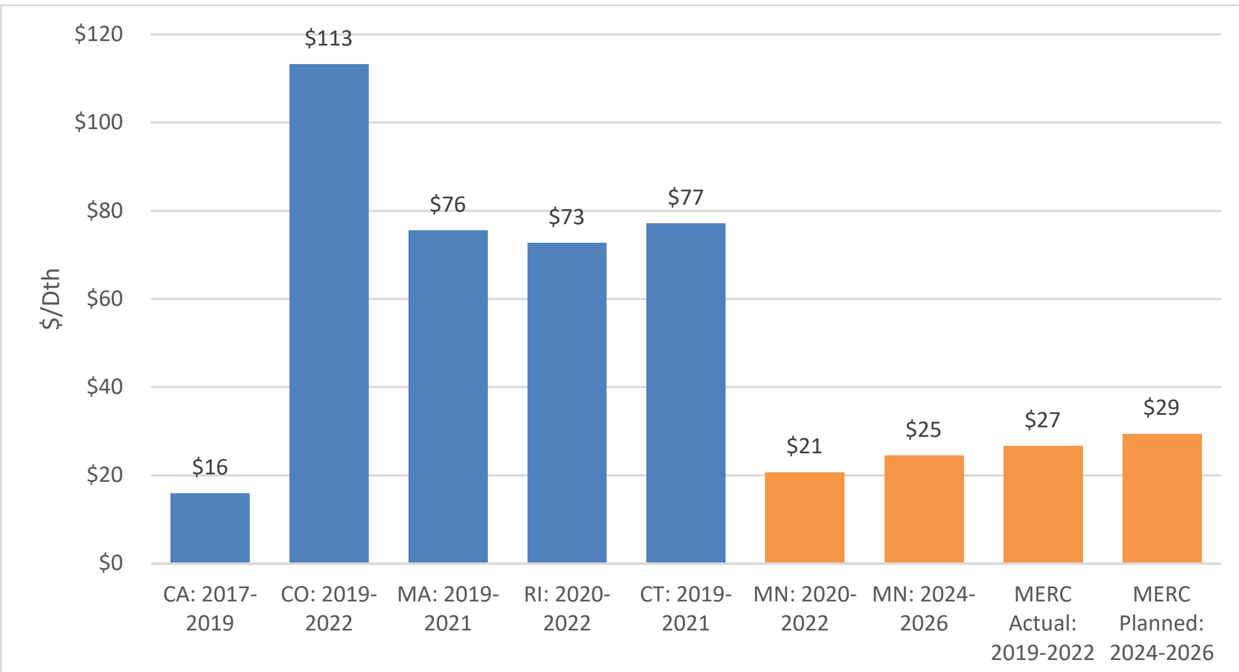
Within the analysis, state savings values are converted from net values to gross values to align with Minnesota reporting. To do this, the analysis applies a general 0.906 net-to-gross ("NTG") factor that is based on the ACEEE 2022 State Scorecard. Contrary to this uniform assumption, however, NTG values are much more nuanced and can vary greatly depending on program offerings, technology type, and region. Therefore, applying a singular value across the board for all data points may not lead to an accurate point of comparison.

The Department also highlights the fact that the comparison data points come from states that ranked highly in the 2022 ACEEE State Scorecard, such as Massachusetts and California. However, the Department fails to account for the distinctive regulatory environments that these utilities operate in, including overall program budgets and expenditures, and different incentive mechanisms and spending rules. Given the disparities between the regulatory environments that utilities operate under in different states, an alternative metric to compare the performance incentive may be more appropriate.

The Department's proposal took into the account of the performance incentive levels of various states, but did not evaluate the total program budgets and expenditures of those states. It could be argued that utilities with higher program budgets per savings need less of an “incentive” to drive program performance.

The figure below provides a comparison of natural gas program budgets or expenditures per dekatherm over annual natural gas savings for various states.[12] With this metric, MERC is significantly lower than all the comparison states in the Department’s analysis except California.

Figure 1. Comparison of Portfolio Program Planned and Actual Cost of First Year Energy Savings ($/Dth)



The Department’s comparison also did not factor in the cost of acquiring energy savings between states. CenterPoint Energy has previously pointed out in Comments filed in this docket that while Minnesota’s incentives per unit of energy saved may be higher than that seen in other states, the total cost of acquiring energy savings – the combined cost of CIP programs and utility incentives within Minnesota – is consistently among the lowest in the nation, at least for

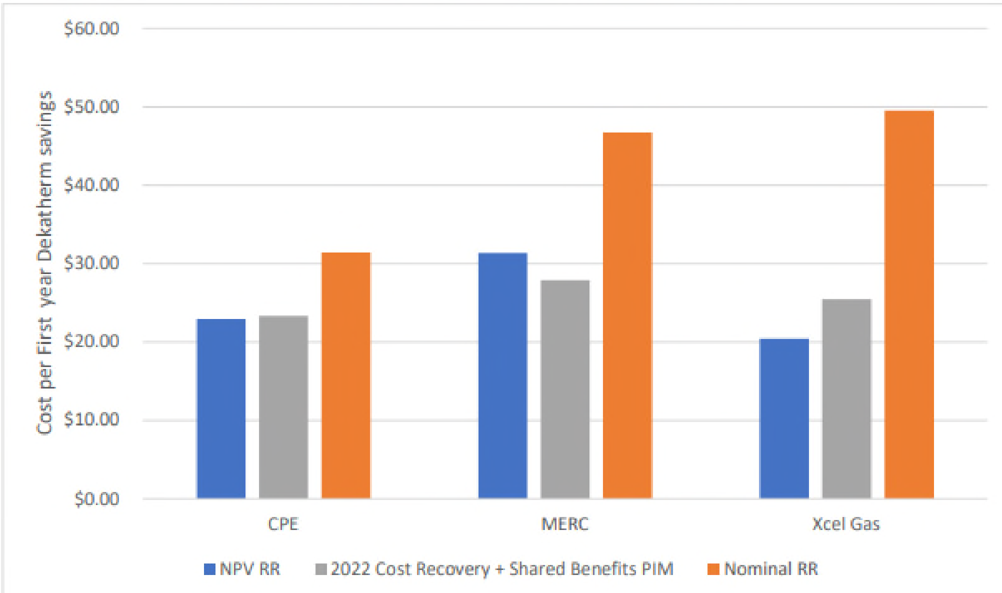
[12] Utility performance incentive data points for CA, CO, MA, RT, and CT were provided by Department Staff, while the utility performance incentive data for MI is sourced from Consumer Energy Company and DTE’s annual reports. Gas DSM Budget data points for CA, CT, MA, and RI were provided by Department Staff, while CO and MI were sourced from their annual reports. Utility revenue data is sourced from the United States Energy Information Administration (EIA) data.

gas utilities.[13] As the Commission has recognized, *"[a]lthough Minnesota's conservation incentives are relatively high compared to similar programs in other states, energy efficiency is still a low-cost resource compared to other types of generation, transmission, and distribution investments."*[14]

The Department also compared CIP recovery and the 2021-2023 incentive mechanism to how a similar sized supply-side investment would be rewarded financially through the cost of service model. Based on that analysis, the Department concludes "*the current amount ratepayers are paying for each unit of first-year energy savings is mostly in between the [net present value of the revenue requirement] and the Nominal [revenue requirement] per unit of first-year energy savings. . . . The fact that ratepayers are still paying an amount close to or often higher than the NPV RR indicates that the Shared Benefits Financial Incentive Mechanism currently in place is extremely generous and lucrative for the utilities*."[15] However, contrary to the Department's conclusion, for MERC, the CIP cost recovery plus incentive was lower than either the total nominal revenue requirement or the net present value of the revenue requirement of an investment included in rate base. As demonstrated in the Department's Figure 18, reproduced below, for MERC, the 2021-2023 incentive mechanism yielded lower costs than if MERC made the same investment and included it for recovery in rate base as a capital investment.

[13] *In the Matter of Commission Review of Utility Performance Incentives for Energy Conservation Pursuant to Minn. Stat. §216B.241, Subd. 2c*, Docket No. E,G999/CI-08-133, CenterPoint Energy Comments at 3 (May 18, 2020).
[14] *In the Matter of Commission Review of Utility Performance Incentives for Energy Conservation Pursuant to Minn. Stat. §216B.241, Subd. 2c*, Docket No. E,G999/CI-08-133, Order Approving 2021-2023 Parameters for Shared Savings Demand-Side Management Financial Incentive at 5 (Dec. 9, 2020).
[15] Department Comments at 35 (Sept. 1, 2023). The Department filed a correction to Figure 18 showing the comparison of cost per first year Dth savings on September 26, 2023. Department Letter (Sept. 26, 2023).

Figure 18:
Comparison of Alternative Mechanisms to the 2021-23
CIP Financial Incentive Mechanism for Gas IOUs



The Department's recommended modifications will lower the incentive even further, resulting an even greater differential. The above table shows that MERC customers receive the benefits of CIP savings at a cost that is below the costs of other investments.

<u>Alternative Proposal for the 2024-2026 Triennial Incentive Mechanism</u>

To ensure that the CIP Incentive Mechanism continues to serve the public interest, the Commission should adopt MERC's alternative Incentive Mechanism proposal. Based on the above considerations, MERC proposes the following modifications to the Department's proposed Incentive Mechanism to align with the policy goals of the Incentive Mechanism:

1. **Establish a Net Benefits Cap of not less than 5%.**

First, MERC proposes to establish a Net Benefits Cap of not less than 5%, rather than the 3.4% cap proposed by the Department. Setting the Net Benefits Cap at this level would help to continue encouraging utilities to pursue cost-effective savings that have both near and longer-term benefits to customers. While this alternative Net Benefits Cap could be applied uniformly across the Minnesota utilities, alternatively, in light of the unique characteristics relevant to MERC as discussed in these Comments, should the Commission establish utility-specific caps, the MERC cap should be not less than 5%. The Commission has previously established a utility-specific net benefits cap based on considerations of the circumstances affecting specific utilities.[16]

2. **Add the incentive award as a cost to expenditures for the purposes of the Incentive Mechanism calculation**.

Second, since the amount of the utility incentive awarded is already included as a cost in the Net Benefits calculation as part of the MN Test, the incentive should likewise be included in the calculation of total expenditures for purposes of applying the CIP Incentive Mechanism Expenditures Cap. This adjustment is important to maintain symmetry among the various components of the Incentive Mechanism.

Please contact me at (651) 322-8917 or jennifer.kimmen@wecenergygroup.com if you have any questions regarding these Comments.

Sincerely,

Jennifer Kimmen
Senior Customer Program Manager
WEC Business Services, Inc.

cc: Service List

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[16] *See In the Matter of Modifications to Minnesota Power's Shared Savings DSM Financial Incentive Mechanism*, Docket No. E,G999/CI-08-133, Order (Nov. 19, 2013) (approving an incentive cap for Minnesota Power equal to 30 percent of net benefits instead of the 20 percent cap applied to other utilities because Minnesota Power sells a disproportionate share of its energy to CIP exempt customers.).

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

Docket No. U999/CI-08-133

CERTIFICATE OF SERVICE

I, Kristin M. Stastny, hereby certify that on the 23rd day of October, 2023, on behalf of Minnesota Energy Resources Corporation (MERC), I electronically filed a true and correct copy of the enclosed Comments on www.edockets.state.mn.us. Said documents were also served via U.S. mail and electronic service as designated on the attached service lists.

Dated this 23rd day of October, 2023.

/s/ Kristin M. Stastny

Kristin M. Stastny

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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_8-133_Official
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