COMMERCE DEPARTMENT

DECISION

BEFORE THE COMMISSIONER OF THE
MINNESOTA DEPARTMENT OF COMMERCE

GRACE ARNOLD, COMMISSIONER

Decision
In the Matter of CenterPoint Energy's
2021-2023 CIP Modification Request
Filed November 1, 2021

Issue Date: January 31, 2022

Docket No. G008/CIP-20-478

I. PROCEDURAL HISTORY

The Energy Conservation and Optimization Act (ECO) was signed into law in May 2021 and contains changes to both the electric and natural gas investor-owned utility (IOU) Conservation Improvement Program (CIP) low-income spending requirements. Current IOU CIP low-income programming plans for 2022 and 2023 were approved prior to these changes in ECO. Consequently, Staff of the Minnesota Department of Commerce, Division of Energy Resources (Staff) requested that the IOUs file a modification to their current 2021-2023 CIP Triennial Plans (Triennial) by November 1, 2021 to demonstrate how the new low-income spending requirements will be met for the remaining years of the current triennial period. Additionally, if an IOU's current Triennial already meets these new requirements, Staff communicated that no modification was necessary.

On November 1, 2021, CenterPoint Energy (CPE or the Company) submitted a Modification Request (Modification) for the Company's Triennial with the Minnesota Department of Commerce, Division of Energy Resources (Department).

On November 16, 2021, Fresh Energy, National Housing Trust (NHT), and Natural Resources Defense Council (NRDC) submitted comments related to the IOU Triennial modifications. In the comments, Fresh Energy et al. requested that the Department issue a Timeline Modification extending the filing schedule so that stakeholders have additional time to provide written comments.

On November 18, 2021, the Deputy Commissioner issued a Timeline Modification to provide stakeholders additional time to review and comment on the IOU Triennial modifications.

By the end of the comment period on December 3, 2021, the Department received joint comments from Center for Energy and Environment (CEE) and Energy CENTS Coalition; and joint comments from Fresh Energy, Community Stabilization Project (CSP), NHT, and NRDC.

By the end of the reply comment period on December 13, 2021, the Department received reply comments from the City of Minneapolis (Minneapolis) and from CPE.

On January 18, 2022, the Commissioner issued a Timeline Modification to allow additional time for Department review and consideration.

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II. BACKGROUND

The ECO Act was signed into law by Governor Tim Walz on May 25, 2021 and enacted the next day.[1] ECO primarily serves to modernize CIP to provide a more holistic approach to energy efficiency programming. ECO was the result of multiple years of stakeholder discussion and development. Notable highlights of ECO include: providing participating electric and natural gas utilities the opportunity to optimize energy use and delivery through the inclusion of load management[2] and efficient fuel switching programs[3]; raising the energy savings goals for the state's electric IOUs;[4] more than doubling the low-income spending requirement for all IOUs;[5] providing greater planning flexibility for participating municipal and cooperative utilities;[6] and including activities to improve energy efficiency for public schools.[7]

Minn. Stat. §216B.241 subd. 7(a) includes ECO's new low-income program spending requirements for the gas IOUs and states that "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."

Current IOU CIP low-income programming plans for 2022 and 2023 were approved prior to these changes in ECO. Consequently, Staff requested that the IOUs file a modification to their current Triennial by November 1, 2021 to demonstrate how they will meet the new low-income spending requirement for the remaining years of the current triennial period.

CPE's Modification includes proposed changes related to the following four main areas:

1. Complying with ECO's new minimum low-income spending requirements.
2. Adding budget for health, safety, and structural pre-weatherization measures for Low-Income Weatherization (LIW), Low-Income Rental Efficiency (LIRE), and Non-Profit Affordable Housing Rebates (NPAH) programs.
3. For the LIW program, modifying the program's low-income eligibility requirements and increase the program's CIP goals.
4. Providing a combined total of $500,000 to state accounts in 2022.

The Commissioner's findings and determinations regarding CPE's Modification are presented in the following sections.

[1] Minnesota Energy Conservation and Optimization Act of 2021
[2] See Minn. Stat. § 216B.241, subd. 13.
[3] See Minn. Stat. § 216B.2403, subd. 8.
[4] Minn. Stat. § 216B.241, subd. 1c(b).
[5] Minn. Stat. § 216B.241, subd. 7(a).
[6] Minn. Stat. § 216B.2403, subd. 3.
[7] See Minn. Stat. §§ 216B.2403, subd 3(j) and 216B.241, subd. 2(i).

III. ANALYSIS

This section presents an analysis of the key proposed changes included in CPE's Modification along with the Commissioner's determinations. CPE's Modification also includes revised CIP goals that are incorporated into Tables 6, 7, and 8 of this Decision.

1. Complying with the Minimum Low-income Spending Requirements

The Company's plan for meeting ECO's low-income spending requirement in 2022-2023 includes the following key elements and is summarized in Table 1:

- Proposing a budget of $880,000 annually (2022-2023) for addressing health and safety pre-weatherization measures with $780,000 allocated between the LIW, LIRE, and NPAH programs and $100,000 allocated to the Healthy AIR account.
- Contributing $400,000 toward the energy conservation account in 2022.
- Incorporating low-income spending through hybrid commercial and industrial (C/I) programs.
- Submitting a formal modification during 2022 with $200,000 in new proposed dedicated low-income programs for implementation in 2023.

Table 1. 2022-2023 Low-income Spending Plan

	Original 2021-2023 Triennial Filing		New Low-Income Spending Plan	
	2022	**2023**	**2022**	**2023**
Dedicated Low-income Programs				
Low-Income Weatherization	$3,258,440	$3,410,589	$3,933,288	$4,090,339
Low-Income Rental Efficiency	$320,810	$336,478	$736,214	$902,956
Low-Income Free Heating System Tune-Up	$162,290	$162,990	$162,290	$162,990
Non-Profit Affordable Housing Rebates	$633,253	$633,877	$682,893	$683,517
Low-Income Multi-Family Housing Rebates	$66,903	$67,262	$66,903	$67,262
State Funds for the Energy Conservation Account	$0	$0	$400,000	$0
State Funds for the Healthy AIR Account	$0	$0	$100,000	$100,000
New Low-Income Programs	$0	$0	$0	$200,000
Sub-Total	$4,441,696	$4,611,196	$6,081,588	$6,207,064
Hybrid C/I Programs (Low-Income Spending ONLY)				
Energy Design Assistance	$196,082	$196,444	$196,082	$196,444
Multi-Family Building Efficiency	$285,846	$299,048	$285,846	$299,048
Total Budget	**$4,764,769**	**$4,937,187**	**$6,563,515**	**$6,688,992**

On December 13, 2021, CPE submitted reply comments to the Department. CPE's reply comments address issues that commenting parties raised as part of the initial comment period for the Company's Modification. A key proposed change to the Company's low-income spending plan that is raised in CPE's reply comments is that the Company is willing to not contribute funds to the energy conservation account in 2022 provided certain conditions are met:

> In responses to comments expressing concern regarding [CPE's] proposed one-time contribution to the energy conservation account, the Company has proposed a plan for reaching the new minimum low-income spending in 2022. [CPE] requests that if there is a low-income spending shortfall in 2022 then the Company be considered in compliance with statute if any shortfall in meeting the low-income minimum spending requirement in 2022 is made up for in 2023 and [CPE] also follows the plan described in Reply Comments above. [CPE] would request that its original proposal to pay $400,000 to the energy conservation account be approved if the alternative approach is not acceptable.

The Company's reply comments discuss how CPE proposes to meet the low-income spending requirement in 2022. This revised plan includes the following elements:

- By the end of Q2 2022 the Company will file new dedicated low-income programs and propose to begin implementation of those programs once they are approved (rather than wait until 2023).
- Address low-income qualifying 5+ unit multi-family buildings and weatherization of 5-20 unit buildings as a part of at least one of the proposed new programs or proposed for existing programs.
- Budget for new programs in 2022 will total $400,000-$600,000, replacing the $400,000 paid into the energy conservation account.

Commissioner's Determinations

Energy Conservation Account Spending

The Commissioner denies CPE's proposal to contribute $400,000 toward the energy conservation account. Additionally, the Commissioner will not waive the one percent low-income spending requirement should CPE fail to meet the requirement in 2022. The Commissioner does, however, clearly recognize the significant challenges associated with the rapid ramp-up in meeting the low-income spending requirement in 2022.

The Commissioner finds CPE's revised proposal to enhance its own low-income program offerings rather than providing a one-time contribution of $400,000 toward the energy conservation account will more effectively ensure that the needs of CPE's low-income customers are met.

Low-Income Hybrid Program Spending

The Commissioner recognizes that utilities may offer hybrid programs that serve a mix of low-income and non-low-income customers. As shown in Table 1, the Company's 2022-2023 proposed low-income budget also includes budgeted amounts from low-income customers participating in the C/I Multi-Family Building Efficiency (MFBE) program and from low-income customers participating in the C/I Energy Design Assistance program.

The Commissioner notes that the hybrid low-income spending goals for these programs were previously approved as part of the Department's November 25, 2020 Decision on the Company's original Triennial filing. As stated on page 7 of the Company's January 20, 2021 approved Triennial, "Low-income participation in the Multi-Family Building Efficiency and Energy Design Assistance ("EDA") project is verified through documentation of pre-qualification in the Department of Energy Weatherization Assistance Program, certification for the Minnesota Low-Income Rental Classification and other documentation as specified in the August 2012 low-income qualification guidance document issued by the Minnesota Department of Commerce."

The Commissioner finds that it continues to be reasonable for CPE to include the planned hybrid spending from the MFBE program and the Energy Design Assistance program toward meeting the Company's low-income spending requirement. CPE's hybrid spending for these programs can be verified as meeting the needs of low-income customers and follows the Department's guidance for low-income hybrid programs as outlined in the

Department's November 25, 2020 Decision. To summarize the hybrid program guidance outlined in the Department's November 25, 2020 Decision, the Department will allow planned low-income spending from hybrid programs when such programs contain the following elements:

- Serve a mix of low-income and non-low-income customers;
- directly serve the needs of low-income customers through some means (e.g. through enhanced rebates);
- propose a reasonable low-income spending goal within the programs;
- develop an acceptable method to identify the low-income portion of total program spending;
- track and clearly report the low-income and non-low-income portions of the programs' spending in annual status reports; and
- contain a method of determining income-eligibility.

Compliance with the One Percent Low-Income Spending Goal

Minn. Stat. §216B.241 subd. 7(a) includes ECO's new low-income program spending requirement for the gas IOUs and states that "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."

Table 2 provides the Company's 2017-2019 residential gross operating revenues (GOR) along with the Company's new minimum low-income spending requirement. Additionally, Table 3 summarizes the Company's proposed 2022-2023 low-income spending goals. The Commissioner finds that CPE's proposed 2022-2023 low-income spending goals comply with the minimum one percent low-income spending requirement.

Table 2. Minimum Low-income Spending Requirements

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	$603,801,367
2022-2023 Statutory Spending Factor	**1.00%**
2022-2023 Statutory Minimum Low-Income Spending	**$6,038,014**

Table 3. CPE's Proposed Low-Income Spending Goals

Dedicated Low-income Programs	**2021[8]**	**2022**	**2023**
Low-Income Weatherization	$3,116,100	$3,933,288	$4,090,339
Low-Income Rental Efficiency	$306,100	$736,214	$902,956
Low-Income Free Heating System Tune-Up	$161,525	$162,290	$162,990
Non-Profit Affordable Housing Rebates	$632,590	$682,893	$683,517
Low-Income Multi-Family Housing Rebates	$66,526	$66,903	$67,262
State Funds for the Healthy AIR Account	$0	$100,000	$100,000
Hybrid C&I Programs (Low-Income Spending ONLY)			
Energy Design Assistance	$195,700	$196,082	$196,444
Multi-Family Building Efficiency	$275,110	$285,846	$299,048
Total Low-Income Spending Goals	**$4,753,652**	**6,163,516**	**6,502,557**
Budget as % of Avg Residential GOR	**0.79%**	**1.02%**	**1.08%**

[8] Per Minn. Stat. §216B.241 subd. 7(a), the one percent low-income spending requirement becomes effective January 1, 2022. Therefore, CPE's 2021 low-income spending goal is not subject to ECO's one percent spending requirement but is noted in this Decision to show the full three years of CPE's Triennial goals.

2. Adding Budget for Health, Safety, and Structural Pre-weatherization Measures

CPE proposes a budget of $880,000 annually (2022-2023) for addressing pre-weatherization measures with $780,000 allocated between the LIW, LIRE, and NPAH programs and $100,000 allocated to the Healthy AIR account. The Company says this change will reduce barriers that currently impede program participation.

On December 06, 2021, Staff submitted an Information Request (IR) to CPE. In the IR, Staff requested that the Company provide a list of pre-weatherization measures that CPE plans to implement as part of its proposed Modification.

On December 16, 2021, the Company provided a response to Staff's IR, which included the following list of the pre-weatherization measures for inclusion in CPE's low-income programs:

- Asbestos. This is inclusive of asbestos remediate that might be associated with siding, HVAC, or piping.
- Vermiculite
- Mold
- Radon mitigation
- Roof leaks. Primarily intending to address roof repairs but replacement may be considered on a lower priority level due to high cost.
- Plumbing leaks. This is inclusive of frozen/burst pipes for domestic hot water and/or boiler/radiators.
- Basement leaks
- Sewer problems
- Substandard electrical wiring or faulty electrical wiring
- Inaccessible crawl spaces
- Excessive clutter causing limited access to space preventing installation of energy efficiency measures. The Company does not plan on addressing more extensive clutter/hoarding issues that may involve mental health or other conditions.
- Chimney liners
- Other items approved on a case-by-case basis

Also, as noted in CPE's IR response:

> CPE is not proposing that it will address all these pre-weatherization measures in all circumstances, only those pre-weatherization measures, or partial pre-weatherization measure, directly preventing installation of energy conservation improvements. However, the Company seeks to include all possible measures into the modified Triennial that might be implemented to address barriers to completing energy efficiency projects, such as weatherization. The Company believes inclusion of these pre-weatherization remediations will allow low-income customers greater access to energy efficiency services.

Commissioner's Determinations

The Commissioner would like to first provide a list of key statutory references that are relevant to CPE's proposal to offer pre-weatherization measures through some of its low-income CIP programs:

- Minn. Stat. §216B.2402 Subd. 20 provides a definition of a pre-weatherization measure, as "an improvement that is necessary to allow energy conservation improvements to be installed in a home."

- Minn. Stat. §216B.241 Subd. 7(f) states that utilities may spend up to 15% of their overall low-Income budget on pre-weatherization measures: "Up to 15 percent of a public utility's spending on low-income programs may be spent on preweatherization measures. A public utility is prohibited from claiming energy savings from preweatherization measures toward the public utility's energy savings goal."
- Minn. Stat. §216B.241 Subd. 7(g) directs the Department to establish a list of pre-weatherization measures eligible for inclusion in CIP low-income programs by March 15, 2022.
- Minn. Stat. §216B.241 Subd. 7(h) outlines requirements related to funding contributions into the Healthy AIR account: "A public utility may elect to contribute money to the Healthy AIR account under section 216B.2403, subdivision 5, paragraph (h), to provide preweatherization measures to households eligible for weatherization assistance under section 216C.264. Remediation activities must be executed in conjunction with federal weatherization assistance program services. Money contributed to the account counts toward: (1) the minimum low-income spending requirement in paragraph (a); and (2) the cap on preweatherization measures under paragraph (f)."

Table 4 summarizes CPE's proposed spending on pre-weatherization measures across its low-income programs.

Table 4. Pre-Weatherization Spending

Program	2021	2022	2023
Low-Income Weatherization	$0	$500,000	$500,000
Low-Income Rental Efficiency	$0	$230,000	$230,000
Non-Profit Affordable Housing Rebates	$0	$50,000	$50,000
State Funds for the Healthy AIR Account	$0	$100,000	$100,000
Total Pre-Weatherization Spending	**$0**	**$880,000**	**$880,000**
% of Total Low-Income Spending	**0.00%**	**14.28%**	**13.53%**

Based on a review of the information provided in CPE's Modification and the Company's IR response, the Commissioner finds CPE in compliance with the statutory requirements pertaining to the inclusion of pre-weatherization measures in the Company's LIW, LIRE, NPAH programs and contributions to the Healthy AIR account.

The Commissioner also notes that the Department will be developing a final list of pre-weatherization measures as part of its policy guidance to be issued by March 15, 2022. However, in the meantime, the Commissioner finds the list of pre-weatherization measures proposed in CPE's Modification to be reasonable.

The Commissioner directs Staff to coordinate with CPE to determine the requirements and logistics needed for CPE to contribute funds into the Healthy AIR account.

3. Additional Low-Income Weatherization Program Modifications

In addition to adding budget to implement pre-weatherization measures as discussed in the previous section, CPE proposes two additional changes to the LIW program:

1. Geographic based automatic low-income eligibility.
2. Increased participation goals for the LIW program based on expectations for potential program growth.

Starting on January 1, 2022, CPE proposes that the LIW program begin to use geography to automatically determine program eligibility for 1-4 unit rental properties with low-income renters. The Company is proposing that this automatic eligibility apply to customers located in the Minneapolis Green Zones starting in 2022, and Areas of Concentrated Poverty by census tract starting in 2023.[9][10] Under the implementation of geographic based low-income eligibility, the automatic eligibility will be used when a low-income renter participating in LIW is ineligible for WAP services or has not been qualified as income-eligible under WAP guidelines. For example, currently at least 50% of duplex and four-plex units and 66% of triplex units in multi-unit buildings must be occupied by income-eligible residents. Customers in rental properties could receive "stand-alone" energy efficiency services, but the eligibility process would be streamlined without the need for establishing the low-income eligibility of all individual renters.

Commissioner's Determinations

The Commissioner has reviewed CPE's proposed changes and finds them to be reasonable. The Commissioner finds that these proposed changes will help meet the needs of low-income customers, increase program participation, and help meet new minimum low-income spending requirements.

The Commissioner finds that CPE's proposed geographic eligibility criteria for the LIW program aligns with the geographic eligibility criteria that was approved previously as part of the Department's November 1, 2021 Decision for CPE's LIRE program. Due to the uniqueness of these geographical proxy approaches, the approval of these methodologies for determining low-income eligibility is limited to the LIRE and LIW programs.

The Commissioner believes that it will be beneficial for the Department to develop a better understanding of using these geographical proxies as a method to reduce challenges and administrative burdens associated with determining low-income program eligibility. To help the Department better assess the effectiveness of this approach, the Commissioner requires that CPE track and include in its annual CIP Status Report the number of participants in the Green Zones and Areas of Concentrated Poverty. The Commissioner also requests that CPE keep Staff informed of the results of the Company's 2022-2023 evaluation that will analyze to what extent low-income renters are being served under these new eligibility criteria.

4. Summary of Cost-Effectiveness

Table 5 provides summary of program cost-effectiveness that reflect the changes proposed in CPE's Modification.

Table 5. Summary of Program Cost-Effectiveness

Program	Ratepayer Impact Test	Utility Cost Test	Societal Test	Participant Test
Low-Income Weatherization	0.25	0.39	0.66	N/A
Low-Income Rental Efficiency	0.22	0.33	0.46	2.96
Non-Profit Affordable Housing Rebates	0.23	0.34	0.56	1.67

[9] Areas of Concentrated Poverty are defined as areas where 40% or more of the residents live below the federal poverty income guideline.
[10] Green Zones Initiative - City of Minneapolis (minneapolismn.gov)

Commissioner's Determinations

Minnesota Rules 7690.0500, subd. 2E requires that utilities report the expected cost-effectiveness of each proposed CIP program from the Societal, Utility, Ratepayer, and Participant perspectives, so that individual program performance can be monitored by Staff. The Department is focused on ensuring that programs are cost-effective from the Societal perspective, as it provides a relatively balanced comparison of CIP program benefits and costs. Programs are considered cost-effective when the benefit/cost ratio is greater than 1.0.

The Commissioner notes that CPE's low-income programs are cost-effective according to the Participant Test, but not according to the other three tests. The Commissioner notes that this was also true prior to CPE's current Modification. The Commissioner recognizes that the Department has historically not held low-income programs to the same cost-effectiveness standards as non-low income programs, recognizing the unique benefits that CIP low-income programs provide in helping serve Minnesota's under-resourced populations.

IV. COMMENTS BY INTERESTED PARTIES

By the end of the comment period on December 3, 2021, the Department received joint comments from CEE and Energy CENTS Coalition (CEE et al.); and joint comments from Fresh Energy, CSP, NHT, and NRDC (Fresh Energy et al.). By the end of the reply comment period on December 13, 2021, the Department received reply comments from the City of Minneapolis and from CPE.

The comments received by the Department are summarized below along with the Commissioner's determinations.

A. FRESH ENERGY ET AL. 11/16 COMMENTS

Below is a summary of Fresh Energy et al.'s November 16, 2021 comments:

- **Pre-Weatherization Measures:** Support the inclusion of pre-weatherization measures as part of CPE's dedicated low-income programs. Recommend robust reporting on incorporation of these new measures, in order to understand lessons learned in implementation.
- **Geographic Approach to Determine LIW Program Eligibility:** Support the approval of this geographic eligibility approach as proposed by CPE.
- **Energy Conservation Account:**
    - Concerned about the commitment of $400,000 to the state's energy conservation account and that the state will be unable to leverage these funds in 2022.
    - Recommend that CPE instead invests all or part of the $400,000 spend in its MFBE program, to be used towards expanding its MFBE program to include more low-income participants, implementing pre-weatherization measures in its multifamily housing segment, and increasing its emphasis on deep savings from building envelope and shell measures such as insulation and air sealing.
- **Reiteration of Comments on 2021-2023 CIP Triennial Plans:**
    - CPE's proposed budget on low-income programs still does not meet the unmet demand and need in this segment, as noted in Fresh Energy's comments on CPE's Triennial filed on August 12, 2020, and again in the comments filed October 13, 2020.
    - Based on the Minnesota Energy Efficiency Potential Study (2020-2029), Fresh Energy et al. believes there are substantial energy savings opportunities for programs that serve under-resourced households and multifamily housing will remain uncaptured.

- Fresh Energy et al. encourages the Company to keep seeking out ways to innovate and ramp up its energy efficiency offerings for under-resourced households (including within non-low-income programs, as is currently the case with the MFBE program) in order to capture more of the potential savings outlined there and reach a more equitable distribution of CIP benefits to under-resourced households.

Commissioner's Determinations

The Commissioner appreciates the joint comments filed by Fresh Energy et al. and applauds their dedication and commitment to underserved communities.

The Commissioner also supports CPE's inclusion of pre-weatherization measures in the Company's low-income programs and has approved that element of CPE's Modification in the "Decision" section of this document. The Commissioner acknowledges the importance of Fresh Energy et al.'s request for reporting data on the incorporation of these new measures, in order to understand lessons learned in implementation. Similar to Fresh Energy et al.'s data request outlined in their December 3, 2021 comments, the Commissioner believes that more discussion is needed later this year to determine the type and granularity of data that would be both useful and reasonable to obtain. Therefore, during second quarter of 2022, the Commissioner directs Staff to work with Fresh Energy, the utilities, and other stakeholders to map out the CIP 2024-2026 financial incentive process, including what data would be most helpful to inform the consideration of a low-income shared-savings mechanism and what data would be useful to obtain related to implementation of pre-weatherization measures.

The Commissioner agrees with Fresh Energy et al.'s concerns about CPE's proposed $400,000 contribution to the energy conservation account. As detailed in the "Decision" section of this document, the Commissioner has denied CPE's proposal to contribute $400,000 toward the energy conservation account. The Commissioner finds CPE's revised proposal (as presented in its reply comments) to enhance its own low-income program offerings rather than providing a one-time contribution of $400,000 toward the energy conservation account will more effectively ensure that the needs of CPE's low-income customers are met.

The Commissioner also concurs with Fresh Energy et al.'s support of CPE's proposed geographic approach to determine LIW program eligibility and has approved that approach in the "Decision" section of this document.

The Commissioner finds that CPE's 2022-2023 planned low-income program spending exceeds the minimum spending requirements outlined in Minnesota Statutes §216B.241, subd. 7(a). CPE is, therefore, in compliance with what is required to be spent on CIP low-income programs. The Department will provide utilities with flexibility to exceed individual program budgets when programs experience high demand. The Commissioner approves the Company's CIP goals as originally proposed, directs Staff to monitor program performance reported in the CIP status reports, and expects the Company to work to meet low-income customer program demand. If there is significantly greater demand from customers than was projected by the Company, the Commissioner can evaluate whether any adjustments are warranted.

B. FRESH ENERGY ET AL. 12/03 COMMENTS

In their joint comments submitted on December 03, 2021, Fresh Energy, CSP, NHT, and NRDC (Fresh Energy et al.) presented a list of data requests for the investor-owned utilities to provide ahead of the 2024-2026 CIP Triennial Plans. Fresh Energy et al. believes that gathering this data from the utilities would help "support consideration and inclusion of a 'low-income' financial incentive mechanism ahead of the next CIP triennium." Fresh Energy et al. specifically requested that the Department direct the utilities to report the following list of data as part of their 2022 CIP Status Reports, which will be submitted to the Department in 2023:

- Total spending on "low-income" offerings in 2022
- Total spending on major measures in 2022, broken down by measure type, e.g.:
    - Advanced thermostats
    - Health and safety/"pre-weatherization" measures
    - All individual appliances >$200 in cost
    - Insulation and air sealing
    - HVAC equipment (including heat pumps displacing electric resistance heat)
    - Water heating equipment (i.e., new water heaters)
- Total spending on minor (non-major) measures in 2022, broken down by measure type, e.g.:
    - Programmable thermostats
    - Direct install (showerheads, aerators, pipe wrap, light bulbs, power strips should be separated out and counted here if currently included in an audit cost or in a whole building performance project bundle)
    - LED bulbs and LED torchieres
    - Dehumidifiers (border case)
    - Microwave ovens
    - Boiler and other HVAC tune-ups
- Total spending on assessments/audits in 2022
- Total spending on other measures not listed above in 2022, broken down by measure
- Total spending on program administration costs in 2022, e.g. Administration, Implementation, M&V, Marketing, and Post-Inspections (i.e. should not be included in any of the above items)

Commissioner's Determinations
The Commissioner acknowledges the importance of Fresh Energy et al.'s request to help measure and track whether CIP low-income programs are meeting the needs of under-resourced households and buildings.

Based on the December 13, 2021 reply comments, several of the utilities appeared open to providing the type of data included in Fresh Energy et al.'s request, but also highlighted a need for more discussion and coordination regarding the specifics of the data request.

The Commissioner finds that more discussion is needed later this year to determine the type and granularity of data that would be both useful and reasonable to obtain from the utilities and to outline a process to efficiently collect such data. Therefore, during second quarter of 2022, the Commissioner directs Staff to work with Fresh Energy, the utilities, and other stakeholders to map out the CIP 2024-2026 financial incentive process, including what data would be most helpful to inform the consideration of a low-income shared-savings mechanism and what data would be useful to obtain related to implementation of pre-weatherization measures.

C. CEE ET AL. 12/03 COMMENTS

Below is a summary of the recommendations from CEE et al.'s December 3, 2021 comments:

- No increase in the LIW budget, beyond the proposed pre-weatherization funding, for 2022 and 2023. The LIW program serves an important part of the low-income sector. However, given its focus on homeowners and the unprecedented funding levels included in the recent federal appropriation, additional funding for LIW will likely have a lower impact compared to an ongoing increase in funding for rental efficiency.

- No funding for the Minnesota Energy Conservation Account. One time funding to this account will have minimal impact on low-income customers and would be better spent in expanding CPE's effective, long-term programs.
- Expand the company's LIRE program to include services for five-20-unit multifamily properties and increase funding for LIRE by $1.1 million each year. The medium-size multifamily market makes up a significant part of the rental market in CPE's territory. Serving this market requires deeper incentive levels such as the 50 percent match in the LIRE program. CPE can better serve this important part of the low-income rental market through LIRE than has been possible to do in the MFBE program because of that program's limited incentives.
- Provide $100,000 to the Healthy AIR Account both years.
- Approve CPE's request to increase low-income CIP program budgets by $880,000 each year, split between LIW, LIRE, NPAH, and the Healthy AIR Account, for pre-weatherization measures in 2022 and 2023.
- Approve CPE's request to use geography to automatically determine program eligibility for LIW for customers located in the Minneapolis Green Zones starting in 2022, and Areas of Concentrated Poverty by census tract starting in 2023.

Commissioner's Determinations

The Commissioner appreciates the joint comments filed by CEE et al. and applauds their dedication and commitment to underserved communities.

The Commissioner agrees with CEE et al.'s concerns about CPE's proposed $400,000 contribution to the energy conservation account. As detailed in the "Decision" section of this document, the Commissioner has denied CPE's proposal to contribute $400,000 toward the energy conservation account. The Commissioner finds CPE's revised proposal (as presented in its reply comments) to enhance its own low-income program offerings rather than providing a one-time contribution of $400,000 toward the energy conservation account will more effectively ensure that the needs of CPE's low-income customers are met.

The Commissioner concurs with CEE et al.'s support of CPE's proposal to provide $100,000 to the Healthy AIR account, CPE's proposed geographic approach to determine LIW program eligibility, and CPE's proposal to increase CIP program budgets for pre-weatherization measures. The Commissioner has approved these elements in the "Decision" section of this document.

The Commissioner finds that that CPE's reply comments thoughtfully address other key questions and concerns that were raised by commenting parties regarding how and why the Company chose to allocate its budgets. The Department will provide utilities with flexibility to exceed individual program budgets when programs experience high demand. The Commissioner approves the Company's CIP goals as originally proposed, directs Staff to monitor program performance reported in the CIP status reports, and expects the Company to work to meet low-income customer program demand. If there is significantly greater demand from customers than was projected by the Company, the Commissioner can evaluate whether any adjustments are warranted.

D. MINNEAPOLIS 12/13 REPLY COMMENTS

Below is a summary of the comments the Department received from Minneapolis:

- Minneapolis supports CPE's proposal to add $100,000 to the state's Healthy AIR account for asbestos removal as part of its pre-weatherization spending.
- Minneapolis also supports the November 16 comments from Fresh Energy et al. recommending less focus on behavior change for under-resourced households. Minneapolis agrees that a more immediate need is to direct new CIP funds to deep energy savings upgrades for under-resourced households, multifamily properties, and renters, especially building envelope and shell measures since the upgrade needs of these households remain high.
- Minneapolis asks that the Department consider whether there will be a framework to quickly deploy the $400,000 of additional spending that CPE proposes for the general "energy conservation account" overseen by Commerce. If so, Minneapolis is supportive CPE's proposal. If the Department anticipates constraints for deploying the funding quickly to where it is needed most, then we support Fresh Energy et al.'s recommendation to direct the funds to existing income-eligible programs.

Commissioner's Determinations

The Commissioner appreciates the comments filed by Minneapolis and applauds their dedication and commitment to underserved communities.

The Commissioner concurs with Minneapolis' support of CPE's proposal to provide $100,000 to the Healthy AIR account and has approved this in the "Decision" section of this Document.

As detailed in the "Decision" section of this document, the Commissioner has denied CPE's proposal to contribute $400,000 toward the energy conservation account. The Commissioner finds CPE's revised proposal (as presented in its reply comments) to enhance its own low-income program offerings rather than providing a one-time contribution of $400,000 toward the energy conservation account will more effectively ensure that the needs of CPE's low-income customers are met.

The Commissioner finds that that CPE's reply comments thoughtfully address other key questions and concerns that were raised by commenting parties regarding how and why the Company chose to allocate its budgets. The Department will provide utilities with flexibility to exceed individual program budgets when programs experience high demand. The Commissioner approves the Company's CIP goals as originally proposed, directs Staff to monitor program performance reported in the CIP status reports, and expects the Company to work to meet low-income customer program demand. If there is significantly greater demand from customers than was projected by the Company, the Commissioner can evaluate whether any adjustments are warranted.

E. CPE 12/13 REPLY COMMENTS

CPE's reply comments addressed issues that other commenting parties raised as part of the initial comment period pertaining to the Company's Modification. A summary of the Company's reply comments is provided as follows:

- CPE appreciates Fresh Energy et al.'s and CEE et al.'s interest and comments on the Company's low-income spending plan. The Company agrees with and appreciates:
  - Fresh Energy et al.'s and CEE et al.'s recommended approval of the Company's plans as filed with regards to:

  - 2022-2023 program budgets for pre-weatherization measures and $100,000 for the healthy AIR account
  - Geographic based low-income eligibility for rental properties participating in LIW
- CPE requests that the budget, including for energy efficiency measures, for LIW be approved as filed. The plan filed November 1 was constructed to be what was reasonably achievable despite potential negative (or positive) effects of recent federal legislation.
- In responses to comments expressing concern regarding the CPE's proposed one-time contribution to the energy conservation account, the Company has proposed a plan for reaching the new minimum low-income spending in 2022. CPE requests that if there is a low-income spending shortfall in 2022 then the Company be considered in compliance with statute if any shortfall in meeting the low-income minimum spending requirement in 2022 is made up for in 2023 and CPE also follows the plan described in Reply Comments above. CPE would request that its original proposal to pay $400,000 to the energy conservation account be approved if the alternative approach is not acceptable.

The Company's reply comments discuss how CPE proposes to meet the low-income spending requirement in 2022. This revised plan includes the following elements:

- By the end of Q2 2022 the Company will file new dedicated low-income programs and propose to begin implementation of those programs once they are approved (rather than wait until 2023).
- Address low-income qualifying 5+ unit multi-family buildings and weatherization of 5-20 unit buildings as a part of at least one of the proposed new programs or proposed for existing programs.
- Budget for new programs in 2022 will total $400,000-600,000, replacing the $400,000 paid into the energy conservation account.

Commissioner's Determinations

The Commissioner finds that that CPE's reply comments thoughtfully address key questions and concerns that were raised by commenting parties.

The Commissioner finds CPE's revised proposal to enhance its own low-income program offerings rather than providing a one-time contribution of $400,000 toward the energy conservation account will more effectively ensure that the needs of CPE's low-income customers are met.

The Commissioner denies CPE's proposal to contribute $400,000 toward the energy conservation account. Additionally, the Commissioner will not waive the one percent low-income spending requirement should CPE fail to meet the requirement in 2022. The Commissioner does, however, clearly recognize the significant challenges associated with the rapid ramp-up in meeting the low-income spending requirement in 2022.

The Department will continue to provide utilities with flexibility to exceed individual program budgets when programs experience high demand. The Commissioner approves the Company's CIP goals as originally proposed, directs Staff to monitor program performance reported in the CIP status reports, and expects the Company to work to meet low-income customer program demand. If there is significantly greater demand from customers than was projected by the Company, the Commissioner can evaluate whether any adjustments are warranted.

CPE's final approved goals can be found in the "Decision" section below.

V. DECISION

The Commissioner finds that CPE has provided the necessary information to be able to evaluate the Modification. The Commissioner has reviewed the Company's proposed changes and finds them to be reasonable and believes they will further enable CPE's CIP programs in meeting the needs of under-resourced customers in Minnesota and complying with the low-income spending requirements.

The Commissioner approves CPE's Modification with the following specific determinations:

1. **Complying with the Minimum Low-Income Spending Requirement**
    A. The Commissioner finds that CPE's proposed 2022-2023 low-income spending goals comply with the minimum one percent low-income spending requirement.
    B. The Commissioner finds that it is reasonable for CPE to include the planned hybrid spending from the MFBE program and the Energy Design Assistance program toward meeting the Company's low-income spending requirement.
    C. The Commissioner denies CPE's proposal to contribute $400,000 toward the energy conservation account.
    D. The Commissioner will not waive the one percent low-income spending requirement should CPE fail to meet the requirement in 2022. The Commissioner does, however, clearly recognize the significant challenges associated with the rapid ramp-up in meeting the low-income spending requirement in 2022.
    E. The Department will provide utilities with flexibility to exceed individual program budgets when programs experience high demand. The Commissioner directs Staff to monitor program performance reported in the CIP status reports and expects the Company to work to meet low-income customer program demand. If there is significantly greater demand from customers than was projected by the Company, the Commissioner can evaluate whether any adjustments are warranted.
    F. Table 6 includes the Company's approved portfolio-wide 2021-2023 goals, which have been updated to reflect the approval of this Modification.
    G. Table 7 includes the Company's approved 2021-2023 low-income spending goals, which have been updated to incorporate the changes approved in this Modification.

2. **Adding Pre-weatherization Measures**
    A. The Commissioner finds that CPE is in compliance with spending under 15% of its overall low-income budget on pre-weatherization measures.
    B. The Commissioner finds CPE in compliance with the statutory requirements pertaining to the inclusion of pre-weatherization measures in the Company's LIW, LIRE, NPAH programs and contributions to the Healthy AIR account.
    C. The Commissioner notes that the Department will be developing a final list of pre-weatherization measures as part of its policy guidance to be issued by March 15, 2022. However, in the meantime, the Commissioner finds the list of pre-weatherization measures proposed in CPE's Modification to be reasonable.
    D. The Commissioner directs Staff to coordinate with CPE to determine the requirements and logistics needed for CPE to contribute funds into the Healthy AIR account.
    E. Table 8 summarizes CPE's approved spending on pre-weatherization measures across its low-income programs.

3. **Low-Income Weatherization Program Geographic Eligibility Criteria**
    A. Approves CPE's proposed geographic eligibility criteria for the LIW program.
    B. Due to the uniqueness of these geographical proxy approaches, the approval of these methodologies for determining low-income eligibility is limited to the LIRE and LIW programs.

C. To help the Department better assess the effectiveness of this approach, the Commissioner requires that CPE track and include in its annual CIP Status Report the number of participants in the Green Zones and Areas of Concentrated Poverty.
D. The Commissioner also requests that CPE keep Staff informed of the results of the Company's 2022-2023 evaluation that will analyze to what extent low-income renters are being served under these new eligibility criteria.

4. Continued Discussions About Low-Income Program Data Reporting

A. During second quarter of 2022, the Commissioner directs Staff to work with Fresh Energy, the utilities, and other stakeholders to map out the CIP 2024-2026 financial incentive process, including what data would be most helpful to inform the consideration of a low-income shared-savings mechanism and what data would be most useful to obtain related to implementation of pre-weatherization measures.

Table 6. Approved Budget, Savings, and Participation Goals

Program and Segment	Spending			Savings			Participants		
	2021	2022	2023	2021	2022	2023	2021	2022	2023
Home Efficiency Rebates	$9,089,265	$9,398,094	$9,705,202	351,058	362,199	377,089	26,560	28,135	29,710
DIY Home Efficiency	$648,550	$680,559	$712,396	41,285	43,276	45,244	15,300	16,100	16,900
Home Insulation Rebates	$1,011,675	$1,013,804	$1,015,750	23,604	23,604	23,604	1,665	1,665	1,665
Home Energy Reports	$1,007,525	$1,008,410	$1,009,219	95,218	95,218	95,218	200,000	200,000	200,000
Home Energy Squad	$2,411,400	$2,683,179	$2,964,667	27,600	32,622	37,641	5,500	6,500	7,500
High Efficiency Home	$3,749,800	$3,752,048	$3,754,103	64,568	64,568	64,568	2,500	2,500	2,500
New Home Construction Rebates	$702,933	$723,953	$744,849	17,577	17,599	17,852	3,900	3,950	4,000
School Kits	$360,775	$370,868	$380,799	15,371	15,371	15,371	15,000	15,000	15,000
Residential Segment	**$18,981,923**	**$19,630,915**	**$20,286,985**	**636,282**	**654,458**	**676,587**	**270,425**	**273,850**	**277,275**
Low-Income Weatherization	$3,116,100	$3,933,288	$4,090,339	14,937	16,016	16,381	1,279	1,371	1,403
Low-Income Rental Efficiency	$306,100	$736,214	$902,956	1,526	2,256	3,023	151	225	302
Low-Income Free Heating System Tune-Up	$161,525	$162,290	$162,990	2,536	2,536	2,536	1,200	1,200	1,200
Non-Profit Affordable Housing Rebates	$632,590	$682,893	$683,517	2,573	2,568	2,568	465	465	465
Low-Income Multi-Family Housing Rebates	$66,526	$66,903	$67,262	1,822	1,822	1,822	10	10	10
State Funds for the Healthy AIR Account	$0	$100,000	$100,000	0	0	0	0	0	0
Low-Income Segment	**$4,282,842**	**$5,681,588**	**$6,007,065**	**23,394**	**25,199**	**26,330**	**3,105**	**3,271**	**3,380**
Commercial Foodservice Equipment Rebates	$700,455	$706,053	$711,424	60,527	60,527	60,527	500	500	500
C&I Heating and Water Heating Rebates	$3,521,939	$3,582,658	$3,640,994	742,435	743,508	744,581	7,419	7,444	7,529
C&I Custom Rebates	$1,957,979	$1,984,363	$2,009,243	154,496	154,496	154,496	43	43	43
C&I Audit Services	$474,975	$477,004	$478,906	6,650	6,650	6,650	201	201	201
Energy Design Assistance	$1,428,470	$1,431,254	$1,433,895	150,651	150,651	150,651	58	58	58
Code Compliance Support	$56,100	$82,523	$115,929	2,576	6,818	11,666	17	45	77
C&I Process Efficiency	$353,251	$356,342	$359,163	17,240	17,240	17,240	10	10	10
C&I Training and Education	$135,050	$134,112	$140,061	806	1,209	1,612	1,010	1,015	1,020
Benchmarking Services and Certification Assistance	$226,150	$177,118	$183,530	0	0	0	595	658	725
Recommissioning Study & Rebates	$146,250	$147,456	$148,611	12,500	12,500	12,500	25	25	25
Multi-Family Building Efficiency	$1,122,897	$1,166,717	$1,220,604	23,881	25,075	26,329	305	321	336
C/I Segment	**$10,123,516**	**$10,245,601**	**$10,442,360**	**1,171,762**	**1,178,674**	**1,186,252**	**10,183**	**10,320**	**10,524**
Analysis, Evaluation, & Project Development	$1,496,400	$1,509,180	$1,521,329	0	0	0	0	0	0
Energy Efficiency Marketing & Awareness	$752,000	$752,000	$752,000	0	0	0	0	0	0
Planning & Regulatory Affairs	$198,250	$204,198	$210,323	0	0	0	0	0	0
EZ Pay On-Bill Loan	$475,387	$497,347	$518,930	0	0	0	300	500	700
Other Projects Segment	**$2,922,037**	**$2,962,724**	**$3,002,582**	**0**	**0**	**0**	**300**	**500**	**700**
Total Portfolio	**$36,310,317**	**$38,520,829**	**$39,738,992**	**1,831,438**	**1,858,330**	**1,889,168**	**284,013**	**287,941**	**291,879**

Table 7. Approved Low-Income Spending Goals

Dedicated Low-income Programs	2021	2022	2023
Low-Income Weatherization	$3,116,100	$3,933,288	$4,090,339
Low-Income Rental Efficiency	$306,100	$736,214	$902,956
Low-Income Free Heating System Tune-Up	$161,525	$162,290	$162,990
Non-Profit Affordable Housing Rebates	$632,590	$682,893	$683,517
Low-Income Multi-Family Housing Rebates	$66,526	$66,903	$67,262
State Funds for the Healthy AIR Account	$0	$100,000	$100,000
Hybrid C&I Programs (Low-Income Spending ONLY)			
Energy Design Assistance	$195,700	$196,082	$196,444
Multi-Family Building Efficiency	$275,110	$285,846	$299,048
Total Low-Income Spending Goals	**$4,753,652**	**6,163,516**	**6,502,557**
Budget as % of Avg Residential GOR	**0.79%**	**1.02%**	**1.08%**

Table 8. Approved Pre-Weatherization Spending Goals

Program	2021	2022	2023
Low-Income Weatherization	$0	$500,000	$500,000
Low-Income Rental Efficiency	$0	$230,000	$230,000
Non-Profit Affordable Housing Rebates	$0	$50,000	$50,000
State Funds for the Healthy AIR Account	$0	$100,000	$100,000
Total Pre-Weatherization Spending	**$0**	**$880,000**	**$880,000**
% of Total Low-Income Spending	**0.00%**	**14.28%**	**13.53%**

BY ORDER OF THE COMMISSIONER

Grace Arnold

Grace Arnold
Commissioner,
Minnesota Department of Commerce,
Division of Energy Resources

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
Decision

Docket No. G008/CIP-20-478

Dated this 31st day of January 2022

/s/Sharon Ferguson

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Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024-9583	Electronic Service	No	OFF_SL_20-478_CIP-20-478
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_20-478_CIP-20-478
Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_20-478_CIP-20-478
Steve	Seidl	SSeidl@enerchange.org	EnerChange	23505 Smithtown Rd Ste 280 Shorewood, MN 55331	Electronic Service	No	OFF_SL_20-478_CIP-20-478
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-478_CIP-20-478

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Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_20-478_CIP-20-478
Anna	Sommer	ASommer@energyfuturesgroup.com	Energy Futures Group	PO Box 692 Canton, NY 13617	Electronic Service	No	OFF_SL_20-478_CIP-20-478
Russ	Stark	Russ.Stark@ci.stpaul.mn.us	City of St. Paul	390 City Hall 15 West Kellogg Boulevard Saint Paul, MN 55102	Electronic Service	No	OFF_SL_20-478_CIP-20-478
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_20-478_CIP-20-478
Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP	80 S 8th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-478_CIP-20-478
Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop	211 S. Harth Ave Madison, SD 57042	Electronic Service	No	OFF_SL_20-478_CIP-20-478
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Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_20-478_CIP-20-478
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_20-478_CIP-20-478
Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park	5005 Minnetonka Blvd St. Louis Park, MN 55416	Electronic Service	No	OFF_SL_20-478_CIP-20-478

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Charlie	Buck	charlie.buck@oracle.com	Oracle	760 Market St FL 4 San Francisco, CA 94102	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Patrick	Deal	pdeal@mnchamber.com	Minnesota Chamber of Commerce	400 Robert St N Ste 1500 Saint Paul, MN 55101	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

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Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.	7701 France Ave S Ste 600 Edina, MN 55435	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.	823 E 7th St St. Paul, MN 55106	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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Melissa S	Feine	melissa.feine@semcac.org	SEMCAC	PO Box 549 204 S Elm St Rushford, MN 55971	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Pat	Green	N/A	N Energy Dev	City Hall 401 E 21st St Hibbing, MN 55746	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jason	Grenier	jgrenier@otpco.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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Bill	Poppert	info@technologycos.com	Technology North	2433 Highwood Ave St. Paul, MN 55119	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024-9583	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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	No	SPL_SL__CIP SPECIAL SERVICE LIST
Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

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Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST