BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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Chair
Commissioner
Commissioner
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ISSUE DATE: January 27, 2010
DOCKET NO. E,G-999/CI-08-133

ORDER ESTABLISHING UTILITY PERFORMANCE INCENTIVES FOR ENERGY CONSERVATION

PROCEDURAL HISTORY

I. Introduction and Factual Background

Demand Side Management (DSM) financial incentives have long been used in Minnesota to encourage conservation investment. Since 2000, the Shared Savings Incentive has been in force, where the incentive is linked to the utilities’ performance in achieving cost-effective conservation. Under the Shared Savings Incentive, the incentive grows for each incremental block of energy savings. The incentive for achieving each new increment of energy savings increases as the percent of goal achieved increases.

With the implementation in 2007 of the Next Generation Energy Act, the means by which to assess energy savings has changed. Minnesota Laws 2007, Chapter 136, Article 2 enacted changes to state energy conservation goals and programs, including establishing an annual energy-savings goal for each utility of 1.5 percent of annual retail energy sales. Prior to this change, the statute’s key guideline hinged on a spending requirement, whereby energy savings were measured using a spending expectation as a percentage of gross operating revenues. With the new legislation, the measurement was altered by the implementation of an energy savings goal of 1.5 percent of retail sales.

On October 14, 2008, the Commission issued a Notice of Comment period soliciting comments on: (1) whether adjustments are needed to existing conservation incentive plans; and (2) if so, what procedures the Commission should use to determine what specific adjustments are needed,


2 Minn. Stat.§ 216B.241, subd. 1(c).
including procedures for considering the nature, scope, and timing of implementation of those adjustments.

After consideration of the comments received, on December 29, 2008, the Commission issued an Order Establishing Procedural Framework for Consideration of Utility Performance Incentives for Energy Conservation. The Commission required utilities to provide further information on how the current incentive model and any other proposed mechanisms would function under the new savings goal. The Commission specifically instructed each utility to provide the following information:

- An evaluation of how the current approved Shared Savings demand side management financial incentive plan would provide an incentive for each utility as it progresses towards meeting the 1.5 percent energy savings goal.
- An evaluation of how the alternative incentive models would motivate each utility as it progresses towards meeting the 1.5 percent energy savings goal.
- An explanation of how any change to the current financial incentive would better encourage utilities to exceed historical achievements, address energy savings goal challenges, and benefit ratepayers through increased energy savings.

Pursuant to the Commission’s Order, a stakeholder workgroup was established to evaluate the current incentives and recommend adjustments. Members of the workgroup included: the Center for Energy and the Environment (CEE); CenterPoint Energy; Greater Minnesota Gas; Great Plains Natural Gas; Interstate Power and Light; Izaak Walton League of America; Minnesota Energy Resource Corporation (PNG and NMU); Minnesota Power; the Office of Energy Security of the Minnesota Department of Commerce (OES); Otter Tail Power Company; and Xcel Energy.3

II. Statutory Background

The 2007 Next Generation Energy Act established a goal for all Minnesota electric and natural gas utilities to achieve energy savings equal to 1.5 percent of retail sales. Specifically, Minnesota Statute § 216B.241 subd. 1c (the Conservation Improvement Program statute, or CIP) states:

(a) The commissioner shall establish energy-savings goals for energy conservation improvement expenditures and shall evaluate an energy conservation improvement program on how well it meets the goals set.
(b) Each individual utility and association shall have an annual energy-savings goal equivalent to 1.5 percent of gross annual retail energy sales unless modified by the commissioner under paragraph (d). The savings goals must be calculated based on the most recent three-year weather normalized average.

3 Other parties participating in the comment process included the CIP Exempt group and the Minnesota Chamber of Commerce.
The same legislation amended the CIP statutes to require a review of DSM financial incentives approved under Minnesota Statutes § 216B.16, subdivision 6c. The Minnesota Statutes § 216B.241, subd. 2c states:

Subd. 2c. Performance incentives. By December 31, 2008, the commission shall review any incentive plan for energy conservation improvement it has approved under section 216B.16, subdivision 6c, and adjust the utility performance incentives to recognize making progress toward and meeting the energy savings goals established in subdivision 1c.

Minnesota Statutes § 216B.16, subd. 6c(b) provides the guidelines the Commission must consider in approving a utility’s financial incentive plan:

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.

III. Commission Proceedings to Date

A. The Comment Process

The timeframe for comments established in the Commission’s December 29, 2008 Order required that: by January 30, 2009, utilities and other interested stakeholders recommend which incentive mechanism models merit further evaluation; by March 6, 2009, utilities file individual incentive information; and by April 10, 2009, utilities file reply comments if any.

On January 30, 2009, the OES filed a report outlining the five incentive models to be evaluated by the workgroup.5

On March 6, 2009, the parties filed their analyses of how the five alternative demand side management financial incentive mechanisms would encourage the utilities to progress towards meeting the 1.5 percent energy savings goal, and expressing their opinion as to which option was most appropriate.

4 Since this docket was opened, the 2008 Legislature has amended Minnesota Statutes § 216B.16, subd. 6c (the CIP Incentive statute) to add a new subsection 6c(c)(3), which allows the Commission to:
   adopt any mechanism that satisfies the criteria of this subdivision, such that implementation of cost-effective conservation is a preferred resource choice for the public utility considering the impact of conservation on earnings of the public utility.

5 The incentive models evaluated by the workgroup included the following models: the Shared Savings with No Cap; the New Shared Savings; the Flat Award with Shared Savings; the Increasing Block with Shared Savings Incentive; and the Beat the Average with Shared Savings.
The OES also filed comments on March 6, 2009, setting forth the principles agreed upon by the workgroup for evaluation of alternatives considered.

On April 10, 2009, the parties submitted reply comments. OES filed comments recommending guidelines for utilities to use when submitting their new DSM financial incentive proposals. OES further recommended that the financial incentive should be based on the New Shared Savings model.

On May 8, 2009, the OES filed supplemental comments, clarifying and refining its recommendations. Four utilities filed responsive comments.

By early July, 2009, ten utilities had filed financial incentive plan proposals – CenterPoint Energy, Great Plains Natural Gas, Interstate Power and Light (gas and electric), Minnesota Power, Minnesota Energy Resource Corporation (PNG and NMU) Northern States Power d/b/a Xcel Energy (gas and electric) and Otter Tail Power Company.

On September 11, 2009, the CIP Exempt Class filed comments,6 asserting that as utility revenues from this class are specifically excluded from Minnesota’s energy policy goals, and, to be consistent with the present savings incentive mechanism, the CIP Exempt Class should not be required to remit payment to utilities for any demand side management program.7

The Minnesota Chamber of Commerce (Chamber) filed comments on September 11, 2009, making recommendations for additional criteria for consideration in the review of utility incentive plans beyond the four criteria established by statute, and arguing that a utility with a decoupling program should not also receive a financial conservation incentive.

The OES also filed comments on September 11, 2009, further refining the guidelines proposed, making recommendations as to the appropriate incentive calibration for each utility, and recommending that the Commission approve calibration levels two-thirds lower for any utility that also has an approved decoupling mechanism.

Reply comments on the financial incentive proposals were filed by the OES, CEE and the Izaak Walton League, Xcel Energy, Great Plains Natural Gas Company, Interstate Power and Light Company, Otter Tail Power Company and CenterPoint Energy on September 24, 2009.

Additional comments were thereafter filed by the OES and CenterPoint Energy. Finally, each utility included in the workgroup filed comments in December 2009 addressing supplemental information requested by Commission staff.

6 The CIP Exempt Class includes Gerdau Ameristeel Corporation, Hibbing Taconite Company, United Taconite, LLC, Blandin Paper Company, Arcelor Mittal USA, NewPage Corporation, Marathon Petroleum Company, LLC, and United States Steel Corporation.

7 The workgroup agreed that it is reasonable that CIP-exempt customers not be allocated any of the costs for a new shared saving incentive plan pursuant to the dictates in this docket, just as the CIP Exempt customers were not allocated any of the costs of the present shared savings incentive. Further, the amount of energy conservation by CIP-exempt customers, which is required under the statute to be “reasonable” is not before the Commission in this docket.
On December 21, 2009, the Commission met to consider the matter.

B. Related Proceedings

On June 19, 2009, the Commission issued its Order Establishing Criteria and Standards to be Utilized in Pilot Proposals for Revenue Decoupling. In its Decoupling Order, the Commission established standards and criteria for decoupling pilot proposals to be used by Minnesota utilities. The Decoupling Order specifically required that a utility implementing a decoupling pilot must explain in detail:

[how the decoupling mechanism will work in concert with any automatic recovery mechanism or financial incentive; this evaluation requires that all utilities provide a list of all automatic recovery mechanisms and incentives as well as justification for any such mechanism/incentive that the utility plans to continue throughout the course of the pilot including an explanation as to how the decoupling pilot mechanism, coupled with any other automatic adjustments and incentives, will not result in double recovery.]

On January 11, 2010, the Commission approved the first decoupling pilot proposal (for CenterPoint Energy) following the Decoupling Order.

FINDINGS AND CONCLUSIONS

I. Proposed Financial Incentive Model

The workgroup participants have jointly requested Commission approval of a new Shared Savings DSM financial incentive to be applied voluntarily to all gas and electric utilities that participate in the OES's Conservation Improvement Program (CIP). The new program is intended to replace the current incentive plans and apply to CIP activities beginning with the 2010 project year. The proposal is the product of a series of work group meetings initiated and facilitated by the OES.

The workgroup ultimately agreed upon the majority of the components of the financial incentive mechanism proposed by the OES to motivate utilities to progress towards and meet the 1.5 percent energy savings goal. All ten of the financial incentive mechanisms proposed by the utilities used a shared savings model. The shared saving incentive mechanism awards a percentage of net benefits created by a utility's energy conservation investments. If a project is not cost-effective, then net benefits decrease. Thus, the shared saving approach encourages utilities to improve the overall cost-effectiveness of their conservation program.

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9 In the Matter of an Application by CenterPoint Energy for Authority to Increase Natural Gas Rates in Minnesota, Docket No. G-008/GR-08-1075, Findings of Fact, Conclusions of Law, and Order (January 11, 2010).
The New Shared Savings approach emphasizes an 1.5 percent energy savings goal, and ties the incentive earned by the utility to pursuit of the 1.5 percent savings goal. The new approach sets a specific dollar amount per unit of energy saved that each utility will earn at energy savings equal to 1.5 percent of annual non-CIP exempt retail sales. This is referred to as the incentive calibration.

The higher the calibration, the higher the incentive will be at all energy savings levels after the threshold. Specifically, each utility's incentive is calibrated so that when the utility achieves energy savings equal to 1.5 percent of retail sales, electric utilities will earn an incentive equal to $0.09 times the number of kWh saved10 and gas utilities will earn at a range from $4.50 to $6.50 times the number of thousand cubic feet (Mcf's) saved.

Importantly, the incremental incentive per additional energy savings achieved is higher than the average incentive achieved. Thus, the closer the energy savings is to reaching the 1.5 percent energy savings goal, the greater the incremental incentive. However, the incentive is still less than the net benefits created through the savings, therefore reserving a majority of the net benefits for ratepayers.

Mandated assessments to utilities will not be included in the calculation of net benefits. Further, as agreed to by the working group, a utility can elect before the beginning of each year whether to include third party programs in its incentive calculation. The costs and benefits of non-elected third party programs will not be included in the calculation.

Working with the OES throughout the nearly year-long process, the workgroup’s final recommendations included the following agreed-upon elements with respect to the proposed financial incentive model:

- The threshold shall be set at half of the utility’s average achievements from 2004 to 2008, removing both the maximum and minimum achievements, or at 0.4 percent of retail sales, whichever is lowest.
- The calibration of 1.5 percent of retail sales for each utility shall be set as follows:
  - $4.50 per Mcf for CPE, IPL-Gas, and Xcel-Gas
  - $5.50 per Mcf for Great Plains
  - $6.50 per Mcf for MERC-NMU and MERC-PNG
  - $0.09 per kWh for IPL-Electric, MP, OTP, and Xcel Electric

10 This calibration was modeled to result in a utility receiving an incentive at historical levels when historical energy savings are achieved.

11 The OES recommended that the Commission approve calibration levels two-thirds lower for any utility that also has an approved decoupling mechanism, and recommended that the calibration level for CenterPoint Energy be set at $1.50, should the Commission approve the Company’s proposal for decoupling in its rate case. At the December 21, 2009 hearing on this matter, the OES agreed to meet with CenterPoint Energy to further evaluate the appropriate adjustment (lowering) of the incentive calibration based on the Commission’s recent rate case Order. See discussion at Section VB of this Order.
• If a utility desires to modify its incentive to correct for non-linear benefits, the correction factor applied to net benefits beyond the utility’s proposed or currently approved energy-savings goals should be increased by 0.05 for each additional 0.1 percent of energy savings.

• The percentage of net benefits to be awarded to each utility at different energy savings levels will be set at the beginning of each year.

• The CIP-Exempt Class shall not be allocated costs for the New Shared Savings Incentive. Sales to the CIP-Exempt Class shall not be included in calculation of utility energy savings goals.

II. Third Party Projects

The workgroup also reached the following agreed-upon principles with respect to the treatment of third-party projects, which it recommends that the Commission adopt.

• If a utility elects not to include a third-party CIP project, the utility cannot change its election until the beginning of subsequent years.

• If a utility elects to include a third-party project, the project’s net benefits and savings will be included in calculation of the percentage of net benefits awarded at specific energy savings levels (calculated before the CIP year begins) and in the post CIP year calculations of net benefits and energy savings achieved and incentive awarded. In any case, the energy savings will count toward the 1.5 percent savings goal.

• The energy savings, costs, and benefits of non third party project modifications will be included in the calculation of a utility’s DSM incentive, but will not change the percent of net benefits awarded at different energy savings levels.

• The costs of mandated, non-third party projects (e.g., Net Generation Energy Act assessment, University of Minnesota Institute for Renewable Energy and the Environment costs) should be excluded from the calculation of net benefits awarded at specific energy savings levels (calculated before the CIP year begins) and in the post-CIP year calculations of net benefits and energy savings achieved and incentive awarded.

• Costs, energy savings, and energy production from Electric Utility Infrastructure Projects (EUIC), solar installation and biomethane purchases shall not be included in energy savings for incentive purposes.  

12 CenterPoint Energy originally disagreed with this recommendation of the OES, as it relates to the Company’s proposed biomethane purchases in its 2010-2012 biennial CIP in Docket No. G-008/CIP-09-644, on the basis of statutory interpretation and net cost. CenterPoint subsequently withdrew its objection to the OES recommendation “for the time being.” CenterPoint indicated its intention to continue to work with the OES and stakeholders to analyze the cost-effectiveness of such projects for possible inclusion of such projects in the financial incentive at a later date.
III. The Cap

The current demand side management financial incentive is capped at 30 percent of the Company’s approved CIP budget, or actual CIP expenditures, whichever is less. The cap limits ratepayer costs and helps ensure against excessive rates charged to ratepayers, who are the ultimate decision-makers as to whether or not to conserve energy.

In this docket, the workgroup and OES evaluated an alternative incentive cap in which the incentive awarded per unit of energy saved shall not exceed 125 percent of a utility’s calibration level at 1.5 percent. The workgroup was also asked to comment on the potential magnitude of incentives should utilities far exceed this goal, e.g., what the potential incentive would be should a utility achieve a goal of 3 percent of retail sales.  

The alternative cap mechanism, or limiting the average incentive per unit of energy saved to 125 percent of the mechanism calibration point, received general support in working group discussions. The OES also supported the alternative cap mechanism, which has the effect of limiting the growth in the incentive (and thus limiting the cost to customers) while retaining an incentive for the utility to pursue additional energy savings above and beyond its goal.

IV. The Effect of a Decoupling Pilot on the Approved Shared Saving Incentive Mechanism for a Utility

A. Introduction

As explained above, in 2007 the Legislature enacted Minn. Stat. § 216B.2412, which required the Commission to establish the criteria and standards to mitigate the impact on public utilities of the energy-savings goals under Minn. Stat. § 216B.241 without adversely affecting utility ratepayers. The statute defines decoupling as a regulatory tool designed to separate a utility’s revenue from changes in energy sales. The purpose of decoupling is to reduce a utility’s disincentive to promote energy efficiency.  

In June 2009, the Commission issued its Order establishing the criteria and standards to be used in pilot proposals for revenue decoupling in Docket No. E,G-999/CI-08-132. Since that time, one utility -- CenterPoint Energy -- has proposed a decoupling pilot project, which was approved by the Commission, in January 2010.

The issue in the present docket with respect to decoupling concerns what effect, if any, the approval of a decoupling pilot project should have on the shared saving incentive mechanism for that utility.

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13 Utilities responded to the potential magnitude of incentives of up to 3 percent as very unlikely and /or not sustainable.

14 Minn. Stat. § 216B.2412, subd. 1.
B. Positions of the Parties

Initial comments from the parties in this docket agreed that any adjustments to the shared savings demand side management financial incentive plans approved in 2000 in Docket No. E.G-999/CI-98-1759, would need to recognize the effects of a Commission order regarding decoupling, anticipated sometime in 2009.

In recommending guidelines for the utilities to consider for a new demand side management financial incentive mechanism, the OES, in its April and May 2009 comments, took the position that no utility should have both an incentive mechanism and a decoupling mechanism at the same time, asserting that having both would result in additional costs to ratepayers. The OES recommended that if the Commission were to approve both decoupling and a financial incentive, the shared savings incentive should be calibrated to a much lower level than the level recommended in this docket.15

In comments filed in May and June 2009, several utilities disagreed with the OES’s recommendation, asserting that demand side management incentives and decoupling have distinct and different functions and are both part of a well-constructed conservation program. The utilities argued that both tools have a place in helping Minnesota achieve the goals expected in the Next Generation Energy Act of 2007, as decoupling removes an existing disincentive to conservation, while a demand side management incentive provides an incentive.

On July 15, 2009, CenterPoint Energy along with other stipulating parties proposed, in its then ongoing rate case, the first decoupling pilot mechanism (the Conservation Enabling Rider) to be considered following the Commission’s June 19, 2009 Decoupling Order.16

The Minnesota Chamber of Commerce (the Chamber) filed comments on September 11, 2009, recommending that the Commission disallow the use of both a decoupling program and a financial incentive, arguing that decoupling is intended to make utilities agnostic on conservation, while an incentive is designed to make them into advocates. The Chamber asserted that the policies are incompatible, and should not be used in tandem.

The CIP Exempt class also maintained that an incentive and a decoupling pilot should be seen as opposite sides of the same coin, and that approval of one mechanism necessarily impacts the other. The Class, therefore, requested that the Commission disallow both a DSM financial incentive and decoupling pilot program for a utility.

The OES subsequently revised its original recommendation that a utility should not have both a decoupling mechanism and an incentive mechanism at the same time. In its September 24, 2009 comments, the OES agreed that the effects of decoupling and financial incentives for utility

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15 For example, the OES recommended that for CenterPoint Energy, which now has a decoupling pilot in place, the incentive should be 2/3 lower, or $1.50 instead of $4.50 times the number of Mcfs saved.

16 The Commission subsequently approved CenterPoint’s partial decoupling plan, as modified by the parties and the Commission. In the Matter of an Application by CenterPoint Energy for Authority to Increase Natural Gas Rates in Minnesota, Docket No. G-008/GR-08-1075, Findings of Fact, Conclusions of Law, and Order (January 11, 2010).
demand side management incentives must be considered in tandem, as both are intended to promote more conservation than would be the case without such measures. OES recommended, however, that the incentive calibration at 1.5 percent of retail sales be reduced by two-thirds in the event the Commission approves a decoupling mechanism for that utility, asserting that for a utility to receive both decoupling and an incentive at the levels herein proposed would be unreasonable and place an undue burden on ratepayers.

Several utilities – CenterPoint Energy, Great Plains, Interstate Power and Light – as well as the Center for Energy and Environment and the Izaak Walton League, voiced their disagreement with the Chamber’s recommendation to disallow a utility’s use of both decoupling and a financial incentive. These utilities also disagreed with the OES’s proposal to reduce the incentive for a utility with a decoupling program, describing the two-thirds proposed reduction as arbitrary. The utilities asserted that both decoupling and the financial incentive are tools that have a place in helping Minnesota achieve the goals expected in the Next Generation Energy Act of 2007.

CenterPoint argued that there should be no trade off between decoupling and financial incentives, since the two serve different but complementary purposes, and that a decoupled utility’s financial incentive should not be reduced at all. CenterPoint asserted that the OES had not established that having both an incentive mechanism and a decoupling program would result in significant costs for ratepayers, and that the OES’s argument fails to recognize that any increased rates which may come about due to decoupling would be overwhelmed by the cost savings ratepayers would see in their overall bills.

CenterPoint further argued that combining decoupling and a financial incentive is the best way to promote conservation, because decoupling removes a utility’s inherent disincentive to promote conservation, citing to the opinions of experts, advocates and policy-makers in Minnesota and across the nation. Further, the combination of decoupling and a significant financial incentive clearly establishes conservation as the preferred resource choice, first by eliminating the penalty the utility pays for each unit of energy saved (decoupling) and then by creating a positive reward when the utility helps its customers conserve instead of consuming energy.

Xcel, while agreeing that the pairing of a decoupling mechanism to remove disincentives and a performance incentive to motivate utilities to exceed goals can be an effective way to maximize energy efficiency, acknowledged that an incentive plan for a utility with decoupling should be evaluated differently than a plan without decoupling.

V. Commission Action

A. Commission Action Regarding the Shared Savings Financial Incentive Plan

The Commission recognizes and appreciates the extensive efforts devoted to the CIP financial incentive issues by the workgroup and other parties to this proceeding. The Shared Savings

17 CenterPoint requested a calibration level of $4.50 per Mcf saved if the Commission were to approve the decoupling proposal in its rate case; if the Commission were not to approve the decoupling mechanism, CenterPoint requested a calibration level of $15.00 per Mcf saved.
Incentive in place in Minnesota since 2000 has served as a very good mechanism for achieving higher energy savings levels and for increasing the cost-effectiveness of conservation programs. The proposed new financial incentive continues along the same design, but improves upon it by discontinuing the statutory spending goal, and replacing it with an energy savings goal.

The proposed changes to the CIP financial incentive clearly received an appropriate and thorough evaluation and vetting by the parties in this year-long proceeding. The parties have displayed both judgment and flexibility as the exchange of comments narrowed the issues. This exchange of comments has provided an important framework for the Commission’s consideration of the relevant issues in the current Order.

Based on its review and analysis of the workgroup recommendations and the parties’ comments, the Commission concludes that the proposed New Shared Savings Model, as detailed by the OES and the workgroup, is a reasonable approach to achieve the requirements and purposes of the Next Generation Energy Act (Minn. Stat. § 216B.241), taking into consideration the factors listed in Minn. Stat. § 216B.16, subd. 6c and the Commission’s duty under Minn. Stat. § 216B.03 to assure just and reasonable rates.

Specifically, the Commission has reflected upon the four considerations listed in Minn. Stat. § 216B.16, subd. 6c. Based on its review of the agreed-upon Shared Savings Incentive Plan, the Commission finds as follows.

The new Shared Savings Incentive Plan is likely to increase utility investment in cost effective energy conservation. The incentive is generous, but the 1.5 percent goal is difficult to reach, and the incentive will motivate utilities to achieve the level of conservation the statute contemplates, and in a cost-effective manner.

The new Shared Savings Incentive Plan is compatible with the interest of utility ratepayers and other interested parties. The incentive is only a small fraction of net benefits achieved by the CIP programs. Ratepayers continue to receive the vast majority of benefits achieved under the CIP programs.

Importantly, the new Shared Savings plan links the incentive to the utilities’ performance in achieving cost-effective conservation. The required linkage is clear. If a utility’s CIP program is not cost-effective, there are no net benefits and thus no incentive. As a CIP program’s cost effectiveness increases, net benefits increase and the incentive increases. The purpose of the new financial incentive is to encourage utilities to increase their energy savings achievements from what they were formerly able to attain.

Accordingly, the Commission will approve the workgroup’s recommendations with respect to the new Shared Savings Model.

B. Commission Action Regarding the Shared Savings Financial Incentive Plan for a Utility with an Approved Decoupling Pilot Project

As set forth above, the Commission accepts and adopts the proposed calibration levels recommended for each utility by the workgroup. However, consensus was not reached as to the
issue of whether the financial incentive calibration level for a utility with an approved decoupling pilot program should be adjusted in some manner. The Commission, having considered the written and oral arguments of the OES and the parties, is not prepared at this juncture to accept either the recommendation of the OES to reduce the calibration level for a decoupled utility by two-thirds, or to make no adjustment at all to the calibration level of a utility with a decoupling pilot project, as recommended by many of the utilities.

The Commission cautions that it has not concluded that the OES’s recommendation with respect to CenterPoint Energy is unreasonable; indeed, after careful consideration of the arguments raised, the Commission is convinced that a utility’s financial incentive should be lowered, or adjusted in some way, if the utility also has an approved ongoing decoupling program. Instead, the Commission simply cannot now say that such a determination is appropriate for all other utilities which might later propose decoupling programs, recognizing that there are varying degrees of decoupling (from limited to full) which might require differing calibration levels to be imposed.

The Commission notes that only one utility to date has an approved decoupling mechanism, and that Commission action approving CenterPoint’s pilot decoupling proposal has only just occurred. Therefore, the Commission finds that it would be premature to address this issue at this juncture as it relates to all utilities which may later come forward with decoupling proposals. Instead, the Commission finds that setting an appropriate calibration level for a utility with a decoupling pilot program could be better addressed and more carefully crafted on a utility-by-utility basis, and with the recognition that an incentive plan for a utility with decoupling should be evaluated differently than a plan without decoupling.

At the Commission hearing on December 21, 2009, the OES and CenterPoint Energy agreed to further discuss and evaluate, by January 31, 2010, the appropriate adjustment -- or lowering -- of the incentive calibration set for CenterPoint in this Order based on the Commission’s Order in CenterPoint’s recent rate case, and to report any recommendations reached to the Commission. The Commission will so order.

C. Miscellaneous Matters

The Commission will require the new shared savings demand side management incentive to be in operation for the length of each utility’s triennial CIP plan.

All utilities except CenterPoint shall make a compliance filing on or before February 1, 2010, integrating the Commission’s decision into their individual incentive proposal. CenterPoint shall make its compliance filing on or before March 1, 2010. Utilities shall thereafter file yearly incentive proposals on or before February 1 of each year.

On or before July 1, 2012, the OES will be required to make an evaluative filing reviewing, proposing changes to and/or recommending continuation/discontinuation of the New Shared Savings model.
ORDER

1. The Commission hereby adopts the new Shared Savings Model which will incorporate the elements set forth below.

Incentive Model

2. The threshold shall be set at half of the utility’s average achievements from 2004 to 2008, removing both the maximum and minimum achievements, or at 0.4 percent of retail sales, whichever is lowest.

3. The calibration of 1.5 percent of retail sales for each utility shall be set as follows:
   - $4.50 per Mcf for CPE, IPL-Gas, and Xcel-Gas
   - $5.50 per Mcf for Great Plains
   - $6.50 per Mcf for MERC-NMU and MERC-PNG
   - $0.09 per kWh for IPL-Electric, MP, OTP, and Xcel Electric

4. If a utility desires to modify its incentive to correct for non-linear benefits, the correction factor applied to net benefits beyond the utility’s proposed or currently approved energy-savings goals should be increased by 0.05 for each additional 0.1 percent of energy savings.

5. The percentage of net benefits to be awarded to each utility at different energy savings levels will be set at the beginning of each year.

6. The CIP-Exempt Class shall not be allocated costs for the New Shared Savings Incentive. Sales to the CIP-Exempt Class shall not be included in calculation of utility energy savings goals.

Third Party Projects

7. If a utility elects not to include a third-party CIP project, the utility cannot change its election until the beginning of subsequent years.

8. If a utility elects to include a third-party project, the project’s net benefits and savings will be included in calculation of the percentage of net benefits awarded at specific energy savings levels (calculated before the CIP year begins) and in the post CIP year calculations of net benefits and energy savings achieved and incentive awarded. In any case, the energy savings will count toward the 1.5 percent savings goal.

9. The energy savings, costs, and benefits of non third party project modifications will be included in the calculation of a utility’s DSM incentive, but will not change the percent of net benefits awarded at different energy savings levels.
10. The costs of mandated, non-third party projects (e.g., Next Generation Energy Act assessment, University of Minnesota Institute for Renewable Energy and the Environment costs) shall be excluded from the calculation of net benefits awarded at specific energy savings levels (calculated before the CIP year begins) and in the post-CIP year calculations of net benefits and energy savings achieved and incentive awarded.

11. Costs, energy savings, and energy production from Electric Utility Infrastructure Projects (EUIC), solar installation and biomethane purchases shall not be included in energy savings for incentive purposes.

**Cap**

12. The Commission adopts the Alternative Incentive Cap in which the incentive awarded per unit of energy saved shall not exceed 125% of a utility's calibration level at 1.5 percent.

**Decoupling**

13. The calibration of the incentive mechanism shall be adjusted in the event that the Commission approves a decoupling mechanism for that utility. The level of adjustment shall be determined on a case-by-case basis.

   A. CenterPoint and OES shall evaluate the proper adjustment (lowering) of the incentive calibration based on the Commission’s recent rate case Order.

   B. CenterPoint and OES shall complete any recommendations that result from the evaluation in 13A by January 31, 2010, and thereafter report such recommendations to the Commission.

**Incentive Timing, Compliance and Evaluation**

14. The new shared savings DSM incentive shall be in operation for the length of each utility’s triennial CIP plan.

15. All utilities except CenterPoint shall make a compliance filing on or before February 1, 2010, integrating the Commission’s decision into their individual incentive proposal. CenterPoint shall make its compliance filing on or before March 1, 2010. Utilities shall thereafter file yearly incentive proposals on or before February 1 of each year.

16. On or before July 1, 2012, the OES shall make an evaluative filing reviewing, proposing changes to and/or recommending continuation/discontinuation of the New Shared Savings model.
17. This Order shall become effective immediately.

BY ORDER OF THE COMMISSION

Burl W. Haar
Executive Secretary

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STATE OF MINNESOTA)
COUNTY OF RAMSEY)

AFFIDAVIT OF SERVICE

I, Margie DeLaHunt, being first duly sworn, deposes and says:

That on the 27th day of January, 2010 she served the attached
ORDER ESTABLISHING UTILITY PERFORMANCE INCENTIVES FOR ENERGY
CONSERVATION.

MNPUC Docket Number: E.G-999/CI-08-133

XX By depositing in the United States Mail at the City of St. Paul, a
true and correct copy thereof, properly enveloped with postage
prepaid

XX By personal service

XX By inter-office mail

to all persons at the addresses indicated below or on the attached list:

Commissioners
Carol Casebolt
Peter Brown
Eric Witte
Marcia Johnson
Kate Kahlert
Janet Gonzalez
Chris Fittipaldi
Susan Mackenzie
Jerry Dasinger
Rachel Welch
Bob Harding
Louis Sickmann
Mary Swoboda
DOC Docketing
AG - PUC
Julia Anderson - OAG
John Lindell - OAG

Subscribed and sworn to before me,
a notary public, this 27th day of

January, 2010

Notary Public
<table>
<thead>
<tr>
<th>Service List Name</th>
<th>First Name</th>
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<td>Andrew</td>
<td>Moratzka</td>
<td><a href="mailto:apm@mcmlaw.com">apm@mcmlaw.com</a></td>
<td>Mackall, Crounse and Moore</td>
<td>1400 AT&amp;T Tower 901 Marquette Ave Minneapolis, MN 55402</td>
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<td>Kline</td>
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<td><a href="mailto:burl.haar@state.mn.us">burl.haar@state.mn.us</a></td>
<td>MN Public Utilities Commission</td>
<td>Suite 350 121 7th Place East St. Paul, MN 551012147</td>
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<td>Brusven</td>
<td><a href="mailto:cbrusven@fredlaw.com">cbrusven@fredlaw.com</a></td>
<td>Fredrikson &amp; Byron, P.A.</td>
<td>200 S 6th St Ste 4000 Minneapolis, MN 554021425</td>
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<td>Clark</td>
<td><a href="mailto:christopher.b.clark@xcelenergy.com">christopher.b.clark@xcelenergy.com</a></td>
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<td>Donald R.</td>
<td>Ball</td>
<td><a href="mailto:don.ball@mdu.com">don.ball@mdu.com</a></td>
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<td>Garvey</td>
<td><a href="mailto:garveyed@aol.com">garveyed@aol.com</a></td>
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<td>Staples</td>
<td>g <a href="mailto:staples@mandotagroup.net">staples@mandotagroup.net</a></td>
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<td>Daugherty</td>
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<td>Lindell</td>
<td><a href="mailto:agorud.ecf@state.mn.us">agorud.ecf@state.mn.us</a></td>
<td>OAG-RUD</td>
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<td>Anderson</td>
<td><a href="mailto:Julia.Anderson@state.mn.us">Julia.Anderson@state.mn.us</a></td>
<td>MN Office Of The Attorney General</td>
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<td><a href="mailto:kpederson@otpco.com">kpederson@otpco.com</a></td>
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<td>Ahern</td>
<td><a href="mailto:ahern.michael@dorsey.com">ahern.michael@dorsey.com</a></td>
<td>Dorsey &amp; Whitney, LLP</td>
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<td>Ferguson</td>
<td><a href="mailto:sharon.ferguson@state.mn.us">sharon.ferguson@state.mn.us</a></td>
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<td><a href="mailto:bgrant@iwla.org">bgrant@iwla.org</a></td>
<td>Izaak Walton League, Midwest Office</td>
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<td>Javaherian</td>
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<td>Aafedt</td>
<td><a href="mailto:daafedt@winthrop.com">daafedt@winthrop.com</a></td>
<td>Winthrop &amp; Weinstine, P.A.</td>
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<td><a href="mailto:dlarson@dakotaelectric.com">dlarson@dakotaelectric.com</a></td>
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<td><a href="mailto:gjwalters@minnesotaenergyresources.com">gjwalters@minnesotaenergyresources.com</a></td>
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<td>Marshall</td>
<td><a href="mailto:pam@energycents.org">pam@energycents.org</a></td>
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