

November 1, 2018

William Grant, Deputy Commissioner  
Minnesota Department of Commerce, Division of Energy Resources  
85 7th Place East, Suite 500  
St. Paul, MN 55101

**RE: JOINT COMMENTERS IN THE MATTER OF THE PETITION OF THE UNIVERSITY OF MINNESOTA FOR AN EXEMPTION FROM NATURAL GAS CONSERVATION IMPROVEMENT PROGRAM CHARGES  
DOCKET No. G008/CIP-18-623**

Dear Deputy Commissioner Grant:

On October 1, 2018 the University of Minnesota (“the University”) filed a petition with the Department of Commerce requesting an exemption from charges for the Conservation Improvement Program (“CIP”) for natural gas purchases from CenterPoint Energy for its Minneapolis campus. The Joint Commenters<sup>1</sup> respectfully submit this letter in opposition to the *Petition of the University of Minnesota for an Exemption from Natural Gas Conservation Improvement Program Charges (“Petition”)*.

The University of Minnesota is among Minnesota’s largest and most prominent public institutions. It is not simply an institution for higher learning, but also a pillar of the Minnesota community and a thought leader nationally. Home to the Institute on the Environment, the Center for Sustainable Building Research, and the University of Minnesota Extension program, among others, the University has a long history of commitment to the state’s environment, economy, and communities in order to further the public interest and build a strong, healthy, and vibrant Minnesota. Further, the University has long demonstrated a deep commitment to energy efficiency and sustainability in the operations of its facilities.

The University’s request to leave CIP stands in stark contrast to that long and impressive record of leadership and commitment to the public interest, the environment, and sustainability. CIP is the state’s primary means for meeting Minnesota’s energy efficiency goals and is critical to meeting Minnesota’s statutory carbon reduction goals, as well as Minneapolis’ city-level carbon reduction goals. Moreover, the request for exemption from CIP runs counter to the University’s own sustainability goals and public pledges to support the transition to low-carbon energy in order to mitigate climate change.<sup>2</sup> Finally, the arguments presented in the University’s *Petition* misrepresent and downplay the value that CIP provides to utility customers, including the University itself.

The Joint Commenters are deeply disappointed in the University for filing this *Petition*, and request the University to withdraw it, to allow for broader discussions with key stakeholders that the *Petition* would

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<sup>1</sup> Joint Commenters include Center for Energy and Environment, City of Minneapolis, Fresh Energy, Citizens Utility Board of Minnesota, Energy CENTS Coalition, Conservation Minnesota, Institute for Local Self-Reliance, and Climate Generation: A Will Steger Legacy.

<sup>2</sup> <https://obamawhitehouse.archives.gov/the-press-office/2015/12/11/american-campuses-act-climate>

negatively impact, including students of the University and others, to attempt to resolve the University's concerns without leaving CIP.

CIP provides important benefits and the continued participation of the University's Minneapolis campus is critical.

Minnesota policymakers have long recognized energy efficiency as a cornerstone of the state's energy policy. Energy efficiency results in benefits to the environment, the utility system, and utility customers through reduced carbon emissions, reduced consumer costs, reduced utility capital costs, and right-sizing of energy loads.<sup>3</sup> Though Minnesota's CIP program has been in existence since the 1980's, the program continues to deliver significant benefits to this day. In 2017, in Minneapolis alone, CIP resulted in approximately \$12 million in annual utility bill savings to customers and reduced carbon-equivalent emissions by 98,660 metric tons.<sup>4</sup>

The value of CIP, from an environmental perspective, is particularly critical and compelling for natural gas, the fuel for which the University requests an exemption. Energy conservation is currently the only cost-effective way to reduce carbon emissions associated with natural gas. Unlike electricity, natural gas has limited and expensive renewable alternatives. Moreover, as other sectors, particularly the electric sector, make progress toward decarbonization, carbon emissions from natural gas must become a priority for mitigation.

Emissions from natural gas within the City of Minneapolis are poised to surpass emissions from electricity, potentially as early as 2017.<sup>5</sup> In 2016, emissions from natural gas made up 35 percent of the total greenhouse gas emissions in Minneapolis, while electricity accounted for 36 percent and on-road transportation for 26 percent.<sup>6</sup> The University's Minneapolis Campus, which consumes approximately 2.3 billion cubic feet of natural gas each year,<sup>7</sup> is one of the largest consumers of natural gas in the City of Minneapolis. The University's level of natural gas consumption is equivalent to the emissions of more than 27,000 passenger vehicles driven for a year or the amount of carbon that would be sequestered by over 150,000 acres of U.S. forests each year.<sup>8</sup>

The level of natural gas consumption, and the resulting carbon emissions, at the University's Minneapolis campus makes it a significant emitter of carbon at both the city and state level. Neither the

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<sup>3</sup> The importance of energy efficiency is reflected in Minnesota statute, which states that "cost-effective energy savings are preferred over all other energy resources," and that "cost-effective energy savings should be procured systematically and aggressively." CIP is the state's primary means of achieving this statutory directive as well as the statutory energy efficiency resource standard, which requires utilities to meet 1.5 percent of energy needs through energy savings.

<sup>4</sup> *Minneapolis Clean Energy Partnership 2017 Annual Report*. July 2018. Page 3.  
[https://mplscleanenergypartnership.org/wp-content/uploads/2018/09/2017-CEP-Annual-Report\\_FINAL\\_2.pdf](https://mplscleanenergypartnership.org/wp-content/uploads/2018/09/2017-CEP-Annual-Report_FINAL_2.pdf)

<sup>5</sup> 2016 is the most recent year for which city-wide greenhouse gas emissions data is available at this time.

<sup>6</sup> City of Minneapolis, *Greenhouse Gas Emissions Continue Downward Trend in 2016*. July 23, 2018.  
<http://www.ci.minneapolis.mn.us/www/groups/public/@citycoordinator/documents/webcontent/wcmstp-214168.pdf>

<sup>7</sup> Page 3 of the *Petition*.

<sup>8</sup> These carbon equivalencies come from the EPA Greenhouse Gas Equivalency Calculator at:  
<https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator>

state, nor the City of Minneapolis, can meet its carbon reduction goals<sup>9</sup> without addressing emissions from natural gas, and that will require support from the city and state's large natural gas consumers, including the University. The Joint Commenters believe that the most effective and verifiable way to ensure that the University is reducing its natural gas consumption and associated emissions at the Minneapolis campus is through the University's continued participation in CIP.

Leaving CIP is counter to the University's commitments to the public interest and the environment.

The University is more than just another commercial participant in the state's energy efficiency program, CIP. The University is a public institution with a celebrated history of stewardship for the environment and the public interest broadly. The University has repeatedly reaffirmed its commitment to the environment and to supporting the well-being of the communities it serves.

On page five of the University's *Petition*, the University provides a number of examples of the University's public commitments to the environment: in 2008, the University signed on to the American Universities and Colleges Presidents Climate Commitment; in 2011, the University released its Climate Action Plan, setting a goal to reduce greenhouse gas emissions by 50 percent by 2021 and to become carbon neutral by 2050;<sup>10</sup> and in 2015, the University signed on to the White House Act on Climate Agreement pledging to "accelerate the transition to low-carbon energy while enhancing sustainable and resilient practices across our campus."<sup>11</sup> The *Petition* goes on to say that, "It was quickly realized that energy conservation and energy efficiency were going to be the primary means to meet the university's ambitious goals."<sup>12</sup> Abandoning the University's participation in CIP is not the way to reach its environmental goals. The University has been an important partner to its energy utilities through the CIP program. That partnership will continue to help the University meet its carbon reduction and climate change mitigation commitments.

In addition to its commitments specific to energy and the environment, the University's guiding principles are to create an environment that: "is conscious of and responsive to the needs of the many communities it is committed to serving...and inspires, sets high expectations for, and empowers the individuals within its community."<sup>13</sup> Though the University's reach is global, one need go no further than Minneapolis to see how the University's participation and partnership with CIP contributes to the community. A robust and healthy CIP in Minneapolis leads to residents and businesses having access to

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<sup>9</sup> The City of Minneapolis Climate Action Plan contains the city's carbon reduction goals. Minnesota's state carbon reduction goals are outlined in Minnesota Statute 216H.02 Greenhouse Gas Emissions Control. Subdivision 1. Greenhouse gas emissions-reduction goal.

<sup>10</sup> [https://dehs.umn.edu/sites/dehs.umn.edu/files/20141117\\_climateactionplanfactsheet.pdf](https://dehs.umn.edu/sites/dehs.umn.edu/files/20141117_climateactionplanfactsheet.pdf)

<sup>11</sup> <https://obamawhitehouse.archives.gov/the-press-office/2015/12/11/american-campuses-act-climate>

<sup>12</sup> Page 6 of the *Petition*.

<sup>13</sup> University of Minnesota Board of Regents Policy, Mission Statement, Subdivision 2. Guiding Principles. [http://regents.umn.edu/sites/regents.umn.edu/files/policies/Mission\\_Statement.pdf](http://regents.umn.edu/sites/regents.umn.edu/files/policies/Mission_Statement.pdf)

energy efficiency opportunities, reduced utility bills for city residents and businesses, a stronger clean energy economy in the City,<sup>14</sup> and improvements in local air quality.

At a global scale, the University's continued participation and support of CIP is equally as consequential. The recent Intergovernmental Panel on Climate Change (IPCC) report<sup>15</sup> made clear that we are at a critical point in our efforts to address climate change and that we must all be doing our part to reduce carbon emissions. In the face of recent resistance at the federal level to grappling with the real threat of climate change, now is not the time for Minnesota's public institutions to pull back from the state's energy efficiency program. In fact, now is a time when we need our public institutions, including the University, to inspire by example and lead the state forward on a shared path to a clean energy future.

The University's *Petition* misrepresents the purpose and value of CIP.

The analysis included in the University's *Petition*<sup>16</sup> to describe the value that the University receives through CIP is flawed and incomplete. First, in its calculation of return-on-investment the University fails to account for its own utility bill savings that result from the energy savings achieved through CIP projects. Instead, the University focuses solely on its CIP charges and CIP rebates. Second, the University's analysis fails to recognize the purpose and value that CIP provides to the utility system and ratepayers overall.

The analysis provided in the University's *Petition* included a calculation of the University's return-on-investment for CIP. This calculation considered only the amount of money that the University paid into CIP for natural gas and the money received in rebates for natural gas CIP projects. The *Petition* states that the University's Minneapolis campus paid approximately \$3.22 million into CenterPoint Energy's CIP over the last five fiscal years and received \$2.95 million in CIP rebates from CenterPoint Energy over the same time period.<sup>17</sup> This calculation far understates the return-on-investment for the University's conservation investments by omitting the utility bill savings associated with natural gas savings, which accrue to the University year-after-year for the entire life of the energy efficiency equipment or measure installed. The natural gas utility bill savings, while not included in the *Petition* for all of the University's CIP projects over the last five fiscal years, would far surpass the amounts the University paid into CIP for the same time period. On page seven of the affidavit attached to the *Petition*,<sup>18</sup> the University estimates the total savings to the University associated with its largest natural gas CIP project, the University's

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<sup>14</sup> CIP has resulted in and will continue to provide significant economic benefits for Minnesota's employment rates, employee earnings, household income, business revenue, industry production, capital investment, and Minnesota domestic product. According to: Minnesota Department of Commerce, *The Aggregate Economic Impact of the Conservation Improvement Program 2008-2013*. October 2015. Page 11. <http://mn.gov/commerce-stat/pdfs/card-report-aggregate-eco-impact-cip-2008-2013.pdf>

<sup>15</sup> The IPCC is the United Nations body for assessing the science related to climate change. The IPCC released a report on October 8, 2018 titled, *Global Warming of 1.5°C, an IPCC special report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty*. The report is available at: <http://www.ipcc.ch/report/sr15/>

<sup>16</sup> Page 9 of the *Petition*.

<sup>17</sup> Page 9 of the *Petition*.

<sup>18</sup> *Affidavit of Jerome Malmquist*

combined heat and power plant, to be approximately \$8 million per year. If included, these cost savings alone would certainly change the University's calculated return-on-investment.

The University's *Petition* also fails to recognize the broader purpose of CIP and its value to the utility system and utility customers. CIP is a program to allow utilities to buy cost-effective energy efficiency as a resource from its customers, just as a utility would purchase any other energy resource in order to meet its customer's energy needs. By purchasing cost-effective energy efficiency from customers, utilities can reduce costs – not only for participating customers, but for all its customers – because cost-effective energy efficiency costs less than purchasing the alternative resource (in this case natural gas). For the natural gas utility system, energy efficiency can enable the utility to avoid costly increased capacity expansions and distribution system upgrades in addition to avoiding additional natural gas fuel purchases. These avoided costs flow through to all ratepayers on the utility's system, including the University, through lower rates. These critical benefits were not included in the University's incomplete cost-benefit analysis. Approval of the University's *Petition* would reduce the amount of cost-effective energy efficiency that CenterPoint Energy would be able to capture from its Minnesota customers, thereby increasing costs to its customers, including those with the least ability to pay.

The University should withdraw its Petition for Exemption from CIP.

The Joint Commenters ask the University to withdraw its *Petition* in order to engage in critical discussions with stakeholders that would be negatively impacted by the *Petition* – students of the University, the City of Minneapolis, representatives of CenterPoint Energy consumers, climate advocates and others – to explore alternative ways to address the concerns raised by the University in its *Petition* without abandoning the University's obligation to the broader public interest in energy efficiency and carbon reductions. Doing so would not impact the University's ability to file its *Petition* again, if those conversations prove not to be fruitful. However, withdrawal of the *Petition* by the University would restore the faith of the Joint Commenters in its commitment to advancing the greater good.

The Joint Commenters appreciate the opportunity to provide input through this docket and thank the Department of Commerce for its consideration.

Sincerely,

/s/

Audrey Partridge  
Regulatory Policy Manager, Center for Energy and Environment



/s/

Kim W. Havey  
Director, City Coordinator's Division of Sustainability  
City of Minneapolis



/s/

Michael Noble  
Executive Director, Fresh Energy



/s/

John Farrell  
Director, Energy Democracy Initiative, Institute for Local Self-Reliance



/s/

Nicole Rom  
Executive Director, Climate Generation: A Will Steger Legacy



/s/

Joseph Pereira  
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/s/

Pam Marshall  
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/s/

Nels Paulsen  
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BEFORE THE MINNESOTA DEPARTMENT OF COMMERCE  
85 7<sup>th</sup> Place East, Suite 500  
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**AFFIDAVIT OF SERVICE**

**Docket No. G008/CIP-18-623**

I, Lecam Trang, hereby certify that on this 1<sup>st</sup> day of November 2018, I served the *Joint Commenters In the Matter of the Petition of the University of Minnesota for an Exemption from Natural Gas Conservation Improvement Program Charges* on the following persons on the attached Service Lists by:

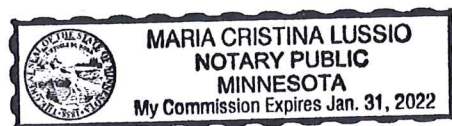
XX placing such filing in envelopes, properly addressed, and depositing the same in the Post Office at the City of Minneapolis, for delivery by the United States Post Office as directed by said envelopes.

XX electronic filing

  
Lecam Trang

Subscribed and sworn to before me  
this 1<sup>st</sup> day of November 2018.

  
Notary Public



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