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Michelle Gransee
Deputy Commissioner
Minnesota Department of Commerce
Division of Energy Resources
85 7th Place East, Suite 500
St. Paul, Minnesota 55101-2198

March 6, 2023

RE: MEEA Public Comments on Staff's Proposed Decision in Docket No. E,G999/CIP-23-46

Dear Deputy Commissioner Gransee:

I write in support of Staff's Proposed Decision in the matter of the 2024-2026 CIP Cost-Effectiveness Methodologies for Electric and Gas Investor-Owned Utilities. The Midwest Energy Efficiency Alliance (MEEA) is a regional membership nonprofit working as a collaborative network, promoting energy efficiency to optimize energy generation, reduce consumption, create jobs and decrease carbon emissions in all Midwest communities.

MEEA has been a partner of the National Energy Screening Project (NESP) since 2018, helping to promote the use of the *National Standard Practice Manual for Benefit-Cost Analysis of Distributed Energy Resources (NSPM for DERs)* in the Midwest. We helped to publicize the Department's 2018 *Synapse Report* and eagerly awaited the process to implement those recommendations and work with stakeholders to update the CIP benefit-cost analysis methodology.

We want to commend Staff on the stakeholder process—in which MEEA participated from the beginning—that led to this Proposed Decision. Staff and their consultants kept stakeholders well informed and conducted effective, productive meetings. Participation from local and national experts, utilities and energy advocates was strong, and all parties had ample opportunities to provide input on issues. Staff followed the five-step framework laid out in the *NSPM for DERs* and held well to the NSPM principles. Robust discussion from participants and well-organized homework assignments informed the process throughout its course, and we are happy to see the results of the stakeholder consensus in this Proposed Decision.

Staff's Proposed Decision, its appendices and your upcoming Decision in this docket will not only play key roles in BCA testing for the CIP plans, but also serve as important references regionally and nationally. The well-executed and transparently documented activities of Staff and the CIP Cost Effectiveness Advisory Committee are a case study in how the authors and promoters of the *NSPM for DERs* expect the process to work. The outcomes are meaningful, straightforward and actionable. We believe that implementation of Staff's recommendations will lead to strong positive outcomes for CIP and continue Minnesota's leadership in the Midwest.

We hope that the lessons learned from this process will continue to resonate within Minnesota and throughout the region. As the state's utilities bring more distributed energy resources to their portfolios, the *Minnesota Test* can and should be used across all those resources to make informed decisions about the selection of both demand-side and supply-side resources.



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We appreciate the opportunity to comment on this matter, and we look forward to your decision. If you have any questions about our work or these comments, please contact Greg Ehrendreich, Senior Research Analyst for MEEA at gehrendreich@mwalliance.org. Thank you for your time and consideration.

Sincerely,

Stacey Paradis, Executive Director
Midwest Energy Efficiency Alliance (MEEA)