



20 N. Wacker Drive, Suite 1301
Chicago, Illinois 60606
312.587.8390 Main Line
312.587.8391 Fax
www.mwalliance.org

June 29, 2023

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

Docket No. E,G999/CI-08-133

Dear Deputy Commissioner Gransee,

The Midwest Energy Efficiency Alliance (MEEA) and Catch Your Dream Consulting are pleased to have served as co-facilitators of Phase I of the Conservation Improvement Program (CIP) "Low-Income+" Workshops.

We always seek to center participants' viewpoints in our facilitation activities and minimize injecting our views into the conversations. Now that the workshops have concluded, however, we would also like to offer our perspective, including our endorsement of the workshop series and support for its continuation into Phase II. We agree with the workshop summaries that were submitted by the Minnesota Energy Efficiency For All (MN EEFA) Coalition to the investor-owned utilities and filed in the CIP triennial dockets.¹

This workshop series stemmed from advocacy of the MN EEFA Coalition, of which MEEA is a member. MN EEFA member organizations like Fresh Energy, National Housing Trust and Natural Resources Defense Council originally utilized this docket, Docket No. E,G999/CI-08-133, to make the case for utility performance incentives for energy conservation in low-income communities.² In response to these comments and the changing legislative environment, the Public Utilities Commission ordered that the Department of Commerce, Division of Energy Resources (the Department) continue a stakeholder process to evaluate the development of a low-income shared savings mechanism.³ Following the passage of the Energy Conservation and Optimization Act in 2021, which, in part, increased low-income energy efficiency spending requirements for investor-owned utilities, the Department began this stakeholder work in preparation for the 2024-26 CIP triennial process.

¹ See comments 20236-196637-01 in Docket No. E,G999/CI-08-133, filed on June 16, 2023, by the Minnesota Energy Efficiency for All coalition.

² See comments 20205-163303-02 in Docket No. E,G999/CI-08-133, filed on May 18, 2020, by Fresh Energy, National Housing Trust and Natural Resources Defense Council.

³ See order by the Minnesota Public Utilities Commission 202012-168892-01 in Docket No. E,G999/CI-08-133 filed on December 9, 2020.



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Through conversations with the Department and other organizations involved in steering the formation of these workshops, we expanded upon the original charge of educating stakeholders about a potential financial incentive and established a forum in which interested parties could discuss a variety of topics that impact low-income CIP offerings.⁴

MEEA has long participated in and facilitated similar low-income energy efficiency stakeholder groups in other Midwestern states, including Illinois, Michigan and Missouri. Additionally, Catch Your Dream Consulting has worked nationwide organizing and facilitating a range of workshops incorporating deliberate efforts to center equity and inclusion within these conversations. Drawing from both of our experiences in facilitating similar workshops regionally and nationwide, we believe that the desired outcome of the CIP workshops was reached: educating stakeholders and community members on low-income energy efficiency programs and policies by providing a forum to learn from experts, hear directly from utilities and engage in small group conversations to deepen understanding and generate new ideas to effectively serve communities.

However, as co-facilitators, we acknowledge the need for continual improvement and hope to expand on this in the next iteration of these workshops. While we hoped to engage community members who had not previously been involved with CIP to ensure the program is inclusive and representative of the communities it serves, we fell short of that goal. Moving forward, we recommend that additional efforts be made to directly reach impacted communities and expand beyond groups already participating in utility energy efficiency discussions. Additional work remains to ensure that energy efficiency programs reach all customers paying into these programs, especially those who need them the most. Having a permanent and consistent forum to discuss challenges and successes in under-resourced efficiency programs can help both impacted communities and utilities in solving problems and disseminating good ideas, as we have seen in other Midwestern collaboratives.

Thank you again for the opportunity to help facilitate the CIP Low-Income+ Workshops and to offer our support in continuing these efforts for Phase II of the series. We hope that the Department of Commerce found this endeavor worthwhile. Our experience as co-facilitators leads us to recommend that the Department should indeed transition this series to a permanent working group, in order to offer Minnesotans and impacted stakeholders an ongoing forum to discuss deployment of equitable energy efficiency programming. We appreciated the support of the Department and the MN EEFA coalition in these efforts and recommend that interested parties refer to the MN EEFA filing, which provides a more extensive summary of these workshops and their findings.

⁴ See comments 2021 12-180672-01 in Docket No. E,G999/CI-08-133 filed on December 15, 2021 by Fresh Energy, Community Stabilization Project, National Housing Trust and Natural Resources Defense Council.



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Sincerely,

William Angelos
Acting Executive Director
Midwest Energy Efficiency Alliance

Donte Curtis
Owner and Lead Consultant
Catch Your Dream Consulting