

**From:** Zoet, Adam (COMM) <[adam.zoet@state.mn.us](mailto:adam.zoet@state.mn.us)>

**Sent:** Wednesday, August 28, 2024 12:22 PM

**Subject:** 8/31 Reporting Deadline for Munis/Coops: ECO Online Reporting Platform

Greetings ECO Utility Representatives,

Thank you for your continued hard work reporting data into the ECO Online Reporting Platform.

Just a reminder that the municipal and cooperative utility reporting deadline is August 31. If circumstances prevent the completion of data entry by August 31, please contact me at [adam.zoet@state.mn.us](mailto:adam.zoet@state.mn.us).

For reference, some reminders along with answers to frequently asked questions about the platform (most of which were provided in my previous emails) are outlined below:

#### **Utility Data Reporting Deadlines**

- Municipal and cooperative utility reporting deadline: August 31, 2024.
- Later this year, Commerce will contact investor-owned utility representatives to begin entering investor-owned utility data.

#### **Points of Contact**

- Adam Zoet ([adam.zoet@state.mn.us](mailto:adam.zoet@state.mn.us)) and Shan Ramalingam ([shan@techzavi.com](mailto:shan@techzavi.com)): Contacts for the new ECO online reporting platform (i.e. for any questions regarding how to use the platform and issues/bugs encountered.)
- Laura Silver ([laura.silver@state.mn.us](mailto:laura.silver@state.mn.us)): Contact for muni/coop reporting and regulatory review (i.e. for any questions regarding the ECO data reporting.)

#### **Reporting Guidance: Consumer-Owned Utilities (i.e. munis, coops, and aggregators)**

- ECO Reporting Platform - Program Admin Module's Electric/Gas Main Data Entry Pages:
  - ECO requirements apply to program years 2023 – Onward (i.e. for both Plan and Actual data reporting).
  - All of the historical data up to (and including) program year 2022 are Pre-ECO requirements.
  - Current program years that will be open for data entry include: 2023 Actuals and 2025, 2026, 2027 Plans (i.e. if utilities select to report a 3-year plan).
  - Historical data years that will be open for data entry include: 2021 Actuals, 2022 Actuals, 2023 Plan, and 2024 Plan.
  - *Please prioritize current program year Actual/Plan data reporting and historical Actual/Plan data years after that.*
- ECO Reporting Platform - Organization Admin Module's Electric/Gas Sales Data Entry Pages:
  - Utilities will need to enter data for years 2021, 2022, and 2023 in the electric/gas sales data entry pages.
- Additional Instructions
  - Aggregator Utilities: Please update your member utilities' contact information when you access the platform for data entry. Also, please update your member utilities' Exempt/Voluntarily reporting status where needed.

- Independent Munis/Coops: Please update your contact information when you access the platform. Also, please update your utility's Exempt/Voluntarily reporting status where needed.
- If your utility has a carry forward balance and you would like to use it for 2023 performance, do not enter it anywhere in the platform. Complete the reporting for your actual 2023 performance. Contact Laura Silver ([laura.silver@state.mn.us](mailto:laura.silver@state.mn.us)) and let her know that you plan to use carry forward and we will proceed from there. The values shown in the reporting platform will reflect the actual amounts achieved in 2023. Additional language will be added to the regulatory review letter that will serve as a confirmation that your utility is in compliance with meeting the energy savings goal for 2023 once the carry forward balance was applied. Additional language in the letter will also discuss how much carry forward balance is remaining.

### **Frequently Asked Questions and Other Key Information About the New Platform**

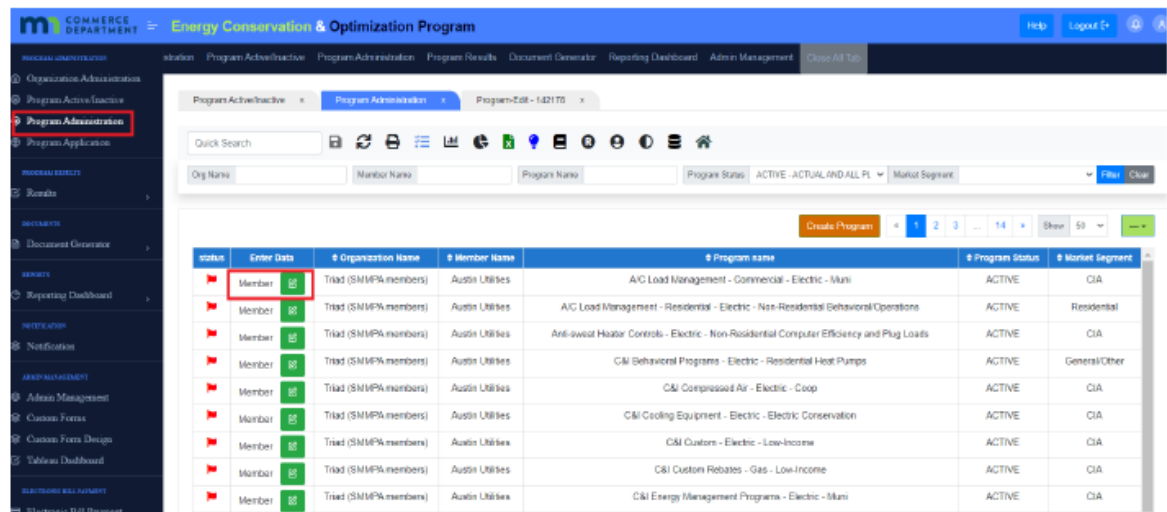
- Why are some of the minimum goals that I've calculated in an Excel spreadsheet not matching the goals displayed in the platform?
  - If you find that some of your utility's ECO minimum goals listed in the ECO Online Reporting Platform do not match your own internal calculations, it could be related to missing sales or gross operating revenue (GOR) data that needs to be entered into the ECO Online Reporting Platform. Additionally, potential ECO minimum goal mismatches could also be related to how the platform treats the sales baseline periods.
  - The platform uses a static baseline logic approach that keeps all of the utilities on the same baseline year period regardless of whether and when they submit a 1-year plan or 3-year plan. The baselines are based on when the ECO requirements took effect and when munis/coops started submitting multi-year plans to the Department (i.e. program years 2023 – onward). The Department does not have a way to create unique/dynamic baseline periods that are based on when the utility submitted their plan and the length of that plan. For reference, the screenshot below is from the Department's 7/12/22 COU reporting guidance presentation. The Department's plan is to follow the logic in this table for future baseline years.
  - To deal with the issue of mismatching baselines that some utilities might run into, the Department intends to treat the utility regulatory letters that were filed on eDockets during the years we used spreadsheet reporting as the **official record for the historical reporting years** and then treat the platform as the **official record for current program years** (i.e. see two bullets below for the specific years).
    - Current program years: 2023 Actuals and 2025, 2026, 2027 Plans (i.e. if utilities select to report a 3-year plan).
    - Historical data years: 2021 Actuals, 2022 Actuals, 2023 Plan, and 2024 Plan.

YEAR	[1] Gross Annual Retail Energy Sales	[2] Sales for EV Charging	(Conceptual) Energy Savings Goal Based On	COUs		
				CIP Triennial Filing	Program Years	Energy Savings Goal GARES Calc Period
2019			[1]			a: uses 3-year WNA for 2019- 2021 [1]
2020			[1]			
2021			[1]			
2022			[1 -2]	a		b: uses 3-year WNA for 2022- 2024, with sales for year reduced by [2]
2023			[1 -2]		a	
2024			[1 -2]		a	
2025			[1 -2]	b	a	c: uses 3-year WNA for 2025- 2027, with sales for each year reduced by [2].
2026			[1 -2]		b	
2027			[1 -2]		b	
2028			[1 -2]	c	b	d: uses 3-year WNA for 2028- 2030, with sales for each year reduced by [2].
2029			[1 -2]		c	
2030			[1 -2]		c	
2031			[1 -2]	d	c	e: uses 3-year WNA based on 2031 and 2032 reduced by [2] and 2033 reduced by 2032 EV
2032			[1 -2]		d	
2033			[1-(2 from 2032)]		d	
2034			[1-(2 from 2032)]	e	d	f: uses 3-year WNA for 2034- 2036 reduced by 2032 EV Sales.
2035			[1-(2 from 2032)]		e	
2036			[1-(2 from 2032)]		e	
2037			[1-(2 from 2032)]	f	e	
2038			[1-(2 from 2032)]		f	

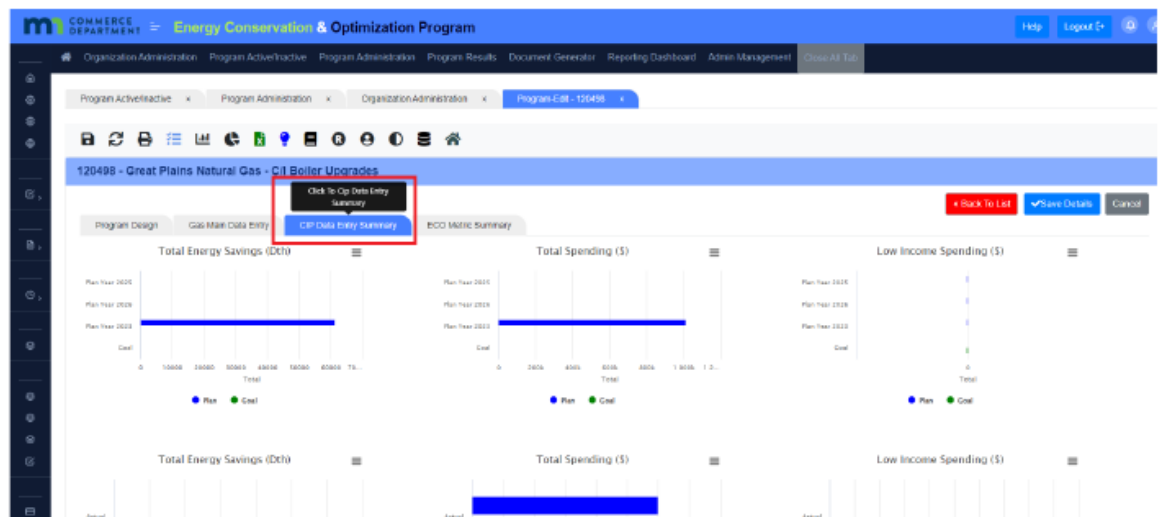
- How can I view ECO Plan and Actual data compared to minimum goals?
  - We haven't built the new muni/coop regulatory letter templates into the new platform quite yet, so utilities will not yet be able to generate draft letters using the platform's the Document Generator.
  - However, utilities should still be able to get general sense of how their Actual and Plan reported data compares to the minimum ECO goals, using the graphs that are built into the platform. Below are instructions for how to view those graphs in the platform:

# View ECO Plan and Actual Data Compared to Minimum Goals

**Step 1:** Under Program Administration Menu, Click the Edit Program Button for which you are reporting.



**Step 2:** Click ECO Data Entry Summary Tab to view the Plan Versus Minimum Goals and Actual Versus Minimum Goals graphical trackers for the reported metrics. These graphs show whether the cumulative ECO Plan and Actual data that you have reported meet some of the key ECO minimum goal requirements.



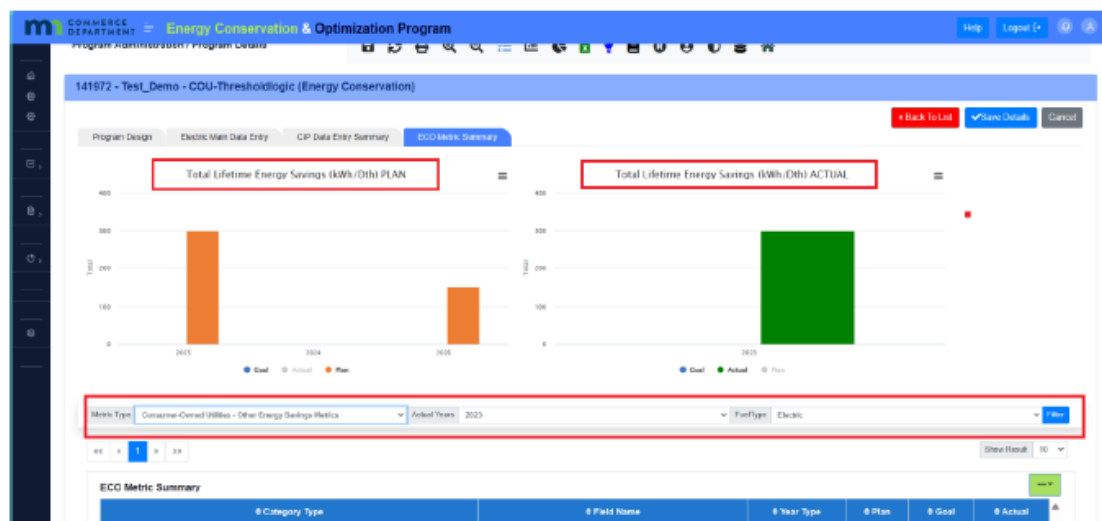
## View ECO-Metrics

**Step 1:** Under Program Administration Menu, Click the Edit Program Button against which you are reporting.

The screenshot shows the 'Energy Conservation & Optimization Program' interface. On the left, the 'Program Administration' menu is highlighted. The main area displays a table of programs with columns for status, enter data, organization name, member name, program name, program status, and market segment. The 'Enter Data' column contains a green 'edit' icon for each row.

status	Enter Data	Organization Name	Member Name	Program Name	Program Status	Market Segment
Member		Triad (SMMPA members)	Austin Utilities	A/C Load Management - Commercial - Electric - Multi	ACTIVE	CIA
Member		Triad (SMMPA members)	Austin Utilities	A/C Load Management - Residential - Electric - Non-Residential Behavioral Operations	ACTIVE	Residential
Member		Triad (SMMPA members)	Austin Utilities	Anti-sweat Header Controls - Electric - Non-Residential Computer Efficiency and Plug Loads	ACTIVE	CIA
Member		Triad (SMMPA members)	Austin Utilities	C&I Behavioral Programs - Electric - Residential Heat Pumps	ACTIVE	General Other
Member		Triad (SMMPA members)	Austin Utilities	C&I Compressed Air - Electric - Coop	ACTIVE	CIA
Member		Triad (SMMPA members)	Austin Utilities	C&I Cooling Equipment - Electric - Electric Conservation	ACTIVE	CIA
Member		Triad (SMMPA members)	Austin Utilities	C&I Custom - Electric - Low-Income	ACTIVE	CIA
Member		Triad (SMMPA members)	Austin Utilities	C&I Custom Rebates - Gas - Low-Income	ACTIVE	CIA
Member		Triad (SMMPA members)	Austin Utilities	C&I Energy Management Programs - Electric - Multi	ACTIVE	CIA

**Step 2:** Click ECO Metric Summary Tab to view the Plan Versus Minimum Goals and Actual Versus Minimum Goals graphical trackers for the reported metrics for difference type of metrics. These graphs show the cumulative ECO Plan, Actual and goal data.



- How do I submit/finalize my data entries in the platform?
  - Please mark your program data entries as completed and also click the "Save Details" button for each of your program data entries. You should see a green "successfully saved" prompt in the right corner of your window. A quick way to verify completion

status is to look at the "Status" field from the Program Administration module. It will show a red flag for those that are pending/incomplete.

Program Administration x

Quick Search

Aggregator Name Please select Val. Organization Name Pleas

**Pending**

status	Enter Data	Organization Name
Member	Minnkota Power Coop	
Member	Minnkota Power Coop	
Member	Minnkota Power Coop	
Member	Minnkota Power Coop	
Member	Minnkota Power Coop	
Member	Minnkota Power Coop	
Member	Minnkota Power Coop	
Member	Minnkota Power Coop	
Member	Minnkota Power Coop	
Member	Missouri River Energy Service	
Member	Missouri River Energy Service	
Member	Missouri River Energy Service	
Member	Missouri River Energy Service	
Member	Missouri River Energy Service	

**Completed**

- What are some of the main ECO statutory requirements for my utility?
  - Please see the attached "Summary of ECO Statutory References and Resources" for a summary of some of the key ECO statutory requirements and links other resources.
- Default Electric Muni/Coop Line Loss Factors:
  - For electric munis/coops, the platform has applied default kW and kWh line loss factors to current Actual and Plan reporting years. The default values should not have overwritten any line loss factor data you may have already entered. Utilities may overwrite these default line loss factors if they prefer to use their own utility-specific line loss data. The following table below includes the default kW and kWh line loss factor values:

Electric Utility Type	Default Line Loss Factors - kWh and kW
Cooperative Utilities	4.09%
Municipal Utilities	2.81%

- Which program years should I prioritize entering data for?
  - Munis/Coops should prioritize reporting the current program year data first (i.e. 2023 Actuals and 2025, 2026, 2027 Plans).
  - Then, when finished reporting the current program year data, munis/coops should shift to entering the historical data (i.e. 2021 Actuals, 2022 Actuals, 2023 Plan, and 2024 Plan).
- Why aren't my data entries saving in the platform?
  - After clicking the "Save Details" button, if the system prompts you with validations to complete pending fields, those pending ones need to be completed before clicking the "Save Details" button again.
  - You should see a green "successfully saved" prompt in the right corner of your window. If not, the data will not be saved.
- If I delete a program by accident, does it go to a trash bin from which it can be retrieved?
  - No. Deleting a program will remove it from the platform and users will have to recreate it.
  - If the same program is active in some other org, then the platform allows you to add that back via the org admin -> add program feature.
  - As a last resort, please contact us if you accidentally deleted a program and we can try to retrieve it from the backend database tables.
- For electric coop data entry, there is a column for # of Customers and another for # of Members. Are these reporting the same numbers?
  - The critical data is number of members. This is what determines whether ECO reporting is required for the coop utilities. The total # of members values should match what is reported on the "Financial and Operating Report Electric Distribution" federal form.
  - If you are able to also enter number of customers, that will help the Department better understand the magnitude of differences between members and customers and allow us to compare utility size (based on customers) to municipal utilities.
- Total Energy Savings Data Logic:
  - In case it's helpful to understand how the platform is tallying up the total energy savings that can be claimed, the attached "FAQ - Thresholds for Energy Savings Types" Word document attempts to summarize the platform's logic/thresholds for when the various energy savings types can be claimed toward a utility's total energy savings.
  - The data mapping outlined in this document applies to NEW Actual and Plan data entries. The data mapping applies to each utility's aggregate reported results. I.e. the mapping applies to utility Actual and Plan data that is summed across all of a utility's programs for a particular reporting year (e.g. 2023 Actuals summed across all a utility's programs). For munis/coops, the ECO requirements apply to program years 2023 – Onward (i.e. for both Plan and Actual data reporting).

- You will see in the Word document that a lot of the platform's data logic is tied to the "Program Type" that users assign to each individual program that you select from the platform's dropdown list (see screenshot below):

Program Design | Electric Main Data Entry | ECO Data Entry Summary | ECO Metric Summary

\* Program Name: Bulb Recycling

\* Market Segment: General/Other x

\* Program Services: Lamp Disposal and Recycling x

\* Fuel Type: Electric

Program Description

Program Narrative -- Provide any key narrative details about the program

\* Does this program offer income qualified services? YES NO

\* Does this program facilitate professional engineering verification to qualify a building for green building certification? YES NO

\* Does this program support goals consistent with Sustainable Buildings 2030 performance standards? YES NO

\* Does this program activities for public... YES NO

\* Program Type: --All--

- ☐ Select All
- Search
- ☐ Biomethane Purchases
- ☐ Distributed and Renewable Generation Projects
- ☐ Efficient Fuel-Switching
- ☐ Electric Utility Infrastructure
- ☐ Energy Conservation
- ☐ Lead Management

LEDs and proper management of spent lamps and LEDs? YES NO

Thank you,  
Adam

Adam Y. Zoet  
Energy Planner, Director  
651-539-1798  
[mn.gov/commerce](http://mn.gov/commerce)  
Minnesota Department of Commerce  
85 7th Place East, Suite 280 | Saint Paul, MN 55101

