



ECO Triennial Engagement: A Clean Energy Advocate Perspective

*ECO Income-Eligible Working Group
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About Fresh Energy

Mission

Shape and drive bold policy solutions to achieve equitable carbon-neutral economies.

Vision

A just, prosperous, and resilient future powered by a shared commitment to a carbon-neutral economy.



About Fresh Energy: Sectors

- ▶ **Electricity:** Build out a resilient energy system capable of powering our economy with clean electricity, with infrastructure and customer programs aligned to create a grid that is affordable, flexible, and reliable.
- ▶ **Buildings:** Achieve high performing healthy housing, commercial buildings, campuses, and neighborhoods that can be affordably heated and cooled with renewable electricity instead of fossil fuel.
- ▶ **Transportation:** Decarbonize the movement of people and goods, prioritizing affordable, accessible zero-emissions technologies and infrastructure with precise deployment of low-carbon fuels.
- ▶ **Agriculture:** Evaluate and advance sustainable technologies, fuels, and cropping systems to reduce carbon emissions from agricultural processes and products through co-created local opportunities.
- ▶ **Heavy Industry:** Create and leverage opportunities to decarbonize the production of goods and materials in a way that grows jobs and economic benefits for Minnesotans.



Fresh Energy's Historical Engagement in ECO

- ▶ More than 30 years of advocacy for policies that expand energy efficiency and renewable energy resources
 - ▶ Fresh Energy originally formed with the name “Minnesotans for an Energy-Efficient Economy”
- ▶ In 2014, Fresh Energy started convening the Minnesota Multifamily Affordable Housing Energy Network, a collaboration of stakeholders working to increase energy efficiency in affordable multifamily housing; later evolved into [Minnesota Energy Efficiency for All \(MN EEFA\) Coalition](#)
 - ▶ Published *Electrification of Multifamily Housing in Minnesota* CARD [report](#)
- ▶ Worked with stakeholders to help [pass the ECO Act](#) in 2021
- ▶ Facilitated the previous iteration of this working group ([Conservation Improvement Program “Low-Income”+ Workshops](#)) with the Department of Commerce and MN EEFA



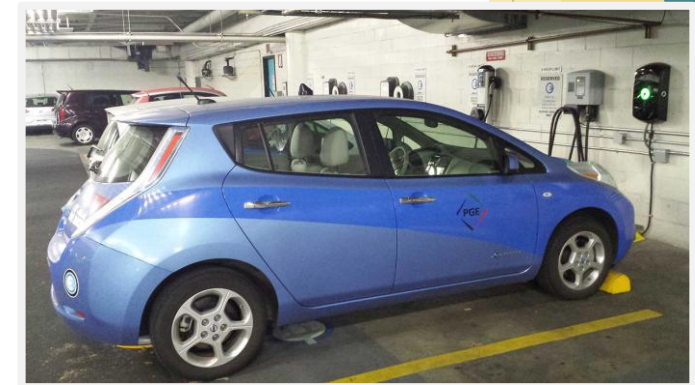
Fresh Energy's Reasons for Engaging in ECO

- ▶ Advance decarbonization across multiple sectors of the economy
- ▶ Prioritize energy efficiency to cut emissions, lower bills, and improve comfort
- ▶ Expand efficient fuel-switching for building heating such as heat pumps
- ▶ Pair electrification with weatherization to maximize whole-home savings
- ▶ Support pre-weatherization to prepare homes for deeper upgrades and address health and safety barriers
- ▶ Strengthen low-income programs and reduce household energy burden



Fresh Energy's Reasons for Engaging in ECO

- ▶ Increase investment in multifamily housing programs to deliver greater energy savings
- ▶ Support transportation electrification through electric vehicle, e-bike, and charging programs where cost-effective
- ▶ Expand load management programs to reduce peak demand and improve grid reliability
- ▶ Modernize cost-effectiveness tests to reflect affordability, health, and societal benefits
- ▶ Align utility financial incentives with policy priorities
- ▶ Center equity and community voices in program design
- ▶ Build a strong, inclusive clean energy workforce



Fresh Energy's 2024-2026 Triennial Comments

- ▶ Efficient fuel-switching to maximize strategic electrification
- ▶ Maximize incentives for building efficiency
- ▶ Evolve beyond programs that incentivize gas appliances
- ▶ Increased outreach and education for under-resourced customers
- ▶ More details:
 - ▶ Fresh Energy [comments](#) on 2024-2026 utility Triennial plans and our [comments](#) on the Department's proposed decision
 - ▶ [Modernizing utility programs to advance an equitable energy transition](#)



2024-2026 Triennial Comments in Partnership with EEFA

Fresh Energy also filed comments as part of the [Minnesota Energy Efficiency for All \(MN EEFA\) Coalition](#) focused on how utilities' plans serve under-resourced customers, renters, and multifamily housing residents.

Recommendations included:

- ▶ Reduce barriers to program participation through expanded outreach and coordination with assistance programs;
- ▶ Ensure multifamily properties receive adequate and equitable energy efficiency measure incentives;
- ▶ Expand heat pump education and incentives for income-qualified, renter, and multifamily customers;
- ▶ Invest in workforce training and using available Inflation Reduction Act grants.
- ▶ More details: MN EEFA's [comments](#) on Xcel's 2024-2026 Triennial plan



Considerations for Effective ECO Triennial Participation

- ▶ Attend utility stakeholder workshops and provide verbal and written feedback before Triennial plans are filed
- ▶ Focus comments on the utilities serving your community or where your organization is most engaged
- ▶ Clearly summarize your top priorities and recommendations
- ▶ Coordinate internally across areas of expertise and externally with partner organizations
- ▶ Consider joint comments or coalition filings
- ▶ Reach out to utilities or the Department's ECO staff with questions
- ▶ Review and comment on the Department's proposed decision



Considerations for Effective ECO Triennial Participation

- ▶ Review final program filings to ensure utilities implement required changes
- ▶ Review utilities' annual status reports and program modification requests to track implementation
- ▶ Engaging in Triennial review also builds expertise for participation in other ECO processes
- ▶ Review past comments on ECO plans for examples and context
 - ▶ Recent utility dockets (2024-2026 ECO Triennial Plans): Xcel (23-92), Minnesota Power (23-93), Otter Tail (23-94), CenterPoint (23-95), GMG (23-96), Great Plains (23-97), MERC (23-98)



Fresh Energy's Participation in ECO Stakeholder Processes

- ▶ ECO stakeholder processes that Fresh Energy participates in:
 - ▶ Cost-effectiveness Advisory [Committee](#) (26-89)
 - ▶ [Technical Reference Manual](#) Advisory Committee (18-694)
 - ▶ Potential Study Advisory Committee
 - ▶ Income-eligible [Working Group](#)
 - ▶ Stakeholder discussion regarding prioritization of customer incentives
- ▶ ECO financial incentive that the PUC approves (08-133)
- ▶ More details: [Minnesota improves ECO to advance electrification, efficiency, and equity ahead of filings](#)



Fresh Energy ECO Resources

- ▶ [The Conservation Improvement Program's legacy in Minnesota](#)
- ▶ [Minnesota improves ECO to advance electrification, efficiency, and equity ahead of filings](#)
- ▶ [Modernizing utility programs to advance an equitable energy transition](#)
- ▶ [ECO Act Update: One year of progress with even more to come](#)
- ▶ [New Report: Electrification of multifamily housing in Minnesota](#)
- ▶ [What's next for equitable, modern efficiency in Minnesota?](#)

