

**State of Minnesota
Before the Public Utilities Commission**

Katie Sieben	Chair
Valerie Means	Commissioner
Matthew Shuerger	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

In the Matter of the Petition by Xcel Energy for
Approval of a Workforce Training and
Development Program Pilot

Docket No. E002/M-21-558

**Initial Comments of the Citizens Utility Board of Minnesota, Energy CENTS Coalition
and Legal Services Advocacy Project**

The Citizens Utility Board of Minnesota (“CUB”), Energy CENTS Coalition (“ECC”) and the Legal Services Advocacy Project (“LSAP”) (collectively, “Consumer Advocates”) respectfully submit these initial comments on Xcel Energy’s (“Xcel” or “the Company”) Petition for Approval of a Workforce Training and Development Program Pilot in the Minnesota Public Utilities Commission (“Commission”) Docket No. E002/M-21-558.

The Citizens Utility Board of Minnesota is a nonprofit organization that advocates on behalf of residential ratepayers for affordable and clean energy and consumer protections in utility service before the Commission and at the Legislature. Energy CENTS Coalition is a nonprofit organization that promotes affordable utility service for low- and fixed-income Minnesotans. The Legal Services Advocacy Project represents the six regional civil legal services programs (Legal Aid) in Minnesota to advocate on behalf of low-income Minnesotans, elder Minnesotans, and Minnesotans with disabilities in administrative and legislative forums. CUB has previously filed comments in Docket No. E,G999/CI-20-492; CUB, ECC and LSAP respectfully file initial comments in this docket.

I. Background

On May 20, 2020, the Commission issued a Notice of Reporting Requirements by Utilities that required rate-regulated electric and gas utilities to provide a report of ongoing, planned, or possible investments that would assist in Minnesota’s economic recovery from the COVID-19 pandemic.¹ In response to that Notice, Xcel Energy submitted a Compliance Report detailing its current and proposed future investments that could potentially aid “in the recovery of the economy, through both immediate relief for customers who are facing hardships as a result of COVID-19 and [by] stimulating economic development, recovery, and job creation over the coming years.”² Subsequently, stakeholders filed numerous comments in the docket analyzing Xcel’s current and proposed investments, as well as encouraging the Company to take steps towards developing a workforce training program designed to promote participation by women and members of low-income, BIPOC, and historically underrepresented communities.

¹ *In the Matter of an Inquiry into Utility Investments that May Assist in Minnesota’s Economic Recovery from the COVID-19 Pandemic*, Docket No. E,G999/CI-20-492, Notice of Reporting Required by Utilities (May 20, 2020).

² *In the Matter of an Inquiry into Utility Investments that May Assist in Minnesota’s Economic Recovery from the COVID-19 Pandemic*, Docket No. E,G999/CI-20-492, Xcel Energy Compliance Report 2 (Jun. 17, 2020).

Subsequently, Xcel proposed additional investments to specifically benefit BIPOC communities within its service territory. This included a workforce and training development program with the goal of “offering construction career readiness opportunities to under-served communities for energy-related careers.”³

As Xcel was meeting with stakeholders and further developing program specifics, the Commission issued an Order in March 2021 urging utilities to “explore partnering with industry partners, building trades unions, academic institutions, community-based organizations, and workforce agencies to identify and develop career pipelines, while making the training and employment opportunities more accessible to underrepresented populations.”⁴ Ultimately, Xcel filed the instant Petition for Approval of a Workforce Training and Development Pilot Program (“Workforce Development Pilot Program,” “Pilot Program,” and “program”). Xcel initially requested authorization to fund the Pilot Program via an increase to a surcharge used to fund Xcel’s low-income energy discount established pursuant to Minn. Stat. § 216B.16, Subdivision 14 (the “Low-Income Energy Discount Surcharge”).

II. Overview of Comments

The Consumer Advocates appreciate the Commission’s intentions in opening the Economic Recovery Docket (Docket No. E,G999/CI-20-492) and its continued commitment to fostering economic recovery in Minnesota, specifically for those communities disproportionately impacted by the COVID-19 pandemic. In its comments in Docket No. E,G999/CI-20-492, CUB supported workforce development projects as the type of project warranting accelerated Commission review and encouraged utilities to further consider and support programs seeking to address “workforce inequities in the energy and utilities sectors.”⁵ The Consumer Advocates continue to be supportive of workforce development opportunities, including Xcel’s instant Petition for a Workforce Training and Development Pilot Program. The proposed Pilot Program seeks to address inequities faced by low-income and BIPOC communities that were exacerbated by COVID-19⁶ and is consistent with the Commission’s call to action in the Economic Recovery Docket.

Without diminishing our general support, the Consumer Advocates have identified a few opportunities for improvement in Xcel’s proposed Workforce Development Pilot Program. We have already discussed some of these opportunities with Xcel and are appreciative of the Company’s willingness to consider our suggestions. As described in detail in the comments below, the Consumer Advocates recommend that the Commission should:

1. Deny Xcel’s proposal to authorize an increase to the Low-Income Energy Discount Surcharge to fund the Workforce Development Pilot Program; and
2. Require the use of enhanced reporting mechanisms to track program participation and success.

³ *In the Matter of an Inquiry into Utility Investments that May Assist in Minnesota’s Economic Recovery from the COVID-19 Pandemic*, Docket No. E,G999/CI-20-492, Xcel Energy Comments 6-7 (Oct. 16, 2020).

⁴ *In the Matter of an Inquiry into Utility Investments that May Assist in Minnesota’s Economic Recovery from the COVID-19 Pandemic*, Docket No. E,G999/CI-20-492, Order Accepting Economic-Recovery Investment Reports, Requiring Filings, and Encouraging Advancement of Diversity Goals 7-8 (Mar. 16, 2021) [hereinafter Commission Order on Diversity Goals].

⁵ *In the Matter of an Inquiry into Utility Investments that May Assist in Minnesota’s Economic Recovery from the COVID-19 Pandemic*, Docket No. E,G999/CI-20-492, Comments of the Citizens Utility Board of Minnesota 5 (Oct. 16, 2020) [hereinafter CUB’s October 16, 2020 Economic Recovery Comments].

⁶ *Id.* at 3.

III. Discussion

a. Raising the Low-Income Energy Discount Surcharge is an Inappropriate Method of Funding the Workforce Development Program.

While the Consumer Advocates generally support Xcel's Petition, we share the Department of Commerce's concerns – as raised in the Department's Reply Comments filed on October 30, 2020 in the Economic Recovery Docket (Docket No. E,G999/CI-20-492) – about the source funding for the Pilot Program.⁷ Xcel has proposed to recover approximately \$4 million in Pilot costs by raising the Low-Income Energy Discount Surcharge from \$0.98 to \$1.06 per month.⁸ We are concerned that authorizing use of the Low-Income Energy Discount Surcharge to fund a program not specifically targeting low-income customers would (i) set an ill-advised precedent that could cause funds raised through that surcharge to be diverted away from existing low-income programs, and/or (ii) make it more difficult/controversial for Xcel to raise the Low-Income Energy Discount Surcharge in the future to address new or expanded challenges impacting Xcel's low-income customers.

Minn. Stat. § 216B.16, Subdivision 14, requires utilities to provide low-income affordability programs for customers receiving assistance from the federal low-income home energy assistance program ("LIHEAP"). The affordability programs must be specifically "designed to target participating customers with the lowest incomes and highest energy costs in order to lower the percentage of income they devote to energy bills, increase their payments, lower utility service disconnections, and decrease costs association with collection activities on their accounts."⁹ As the Department has previously argued, Xcel's proposal will not lower the percentage of income that customers pay for their energy bill¹⁰ or otherwise satisfy the Low-Income Energy Discount Surcharge requirements as detailed in Minn. Stat. § 216B.16, Subdivision 14. The Consumer Advocates support the Department's position and agree that the Low-Income Energy Discount Surcharge is not the appropriate method for financing the Pilot Program.

The Pilot Program's participation requirements further underscore how the program is not designed to exclusively benefit "participating customers with the lowest incomes and highest energy costs."¹¹ Under Minn. Stat. § 216B.16, Subdivision 14, "low-income" is used to describe individuals receiving LIHEAP assistance. However, Xcel's proposed Workforce Development Pilot Program does not limit participation to individuals eligible for, or who are currently receiving, LIHEAP funds. Rather, Pilot Program requirements focus on whether participants are "18 years of age or older, have proof of Minnesota domicile, [are] able to pass a drug test, and have the ability to obtain a valid Minnesota driver license."¹²

After raising these concerns with Xcel, it is our understanding that the Company will no longer seek to use the Low-Income Energy Discount Surcharge in favor of recovering program costs through base rates. Given the potential benefits and relatively low cost of the Pilot Program, we are open to that

⁷See *In the Matter of an Inquiry into Utility Investments that May Assist in Minnesota's Economic Recovery from the COVID-19 Pandemic*, Docket No. E,G999/CI-20-492, Reply Comments of the Minnesota Department of Commerce, Division of Energy Resources 2 (Oct. 30, 2020) [hereinafter Department Comments].

⁸ *In the Matter of Xcel Energy's Petition for Approval of a Workforce Training and Development Program Pilot*, Docket No. E002/M-21-558, Xcel Energy's Initial Filing 12 (July 14, 2021) [hereinafter Xcel Workforce Development Petition].

⁹ Minn. Stat. § 216B.16, subd. 14.

¹⁰ *Id.*

¹¹ Minn. Stat. § 216B.16, subd. 14.

¹² Xcel Initial Filing, at 8.

cost recovery suggestion; however, we believe it is important to establish meaningful metrics to assess the program's effectiveness during, and after, the Pilot phase. If, based on those assessments, a permanent program is proposed, the nature and method of funding should be reevaluated at that time.

b. Xcel Should Establish Enhanced Reporting Mechanisms and Establish Concrete Goals for Program Participation.

Numerous filings in Docket No. E,G999/CI-20-492 emphasize the economic disparities felt by low-income and BIPOC communities in Minnesota and the disproportionate impact the COVID-19 pandemic has had on them. Xcel's proposed Pilot Program seeks to address some of these inequities by providing opportunities to historically underrepresented communities in the energy construction industry. We applaud those efforts. But, in order for Xcel, the Commission, and stakeholders to assess the success and impact of the Pilot Program, we believe it is important for Xcel to establish program metrics that go beyond what is contemplated in its Petition seeking approval of the Pilot Program.

Xcel commits the Pilot Program's RFP awardee to "conduct[ing] communitywide outreach and recruitment in BIPOC communities,"¹³ Xcel also commits to filing two reports that, collectively, provide certain details on demographics and program graduation and that "evaluate . . . the Pilot's level of success and its potential for lasting impact on both creating family sustaining wages and increasing diversity within the building trades."¹⁴ However, it remains a bit unclear how Xcel will measure "success" and whether the Program will have lasting impact.

As CUB has previously noted, "written commitments to workforce and supplier diversity are, alone, ineffective if utilities are not measuring whether/how they meet those commitments."¹⁵ For these reasons, the Consumer Advocates strongly suggest that the Workforce Development Pilot Program include more enhanced reporting requirements and metrics targets than contemplated in Xcel's Petition. In the Economic Recovery Docket, the Laborers' International Union of North America proposed utilizing enhanced Labor Statistics Reporting standards¹⁶ — an idea Xcel previously supported.¹⁷ Utilizing additional enhanced reporting mechanisms to track the progress of the Workforce Development Pilot Program could provide increased transparency and ensure various program metrics — such as job quality and career opportunities post-graduation — are accounted for.

Consistent with this reporting, Xcel should establish a minimally acceptable level of participant involvement from women and members of low-income, BIPOC, and historically underrepresented communities. While the Consumer Advocates are cognizant of the Commission's March 16, 2021 Order "declin[ing] to require specific benchmarks for benefits of economic-recovery investments to accrue to certain communities because of the difficulty of measuring and achieving these benchmarks,"¹⁸ the Workforce Development Pilot Program presents a unique opportunity apart from

¹³ Xcel Workforce Development Petition, at 7.

¹⁴ Xcel Initial Filing, at 9.

¹⁵ CUB's October 16, 2020 Economic Recovery Comments, at 7.

¹⁶ *In the Matter of an Inquiry into Utility Investments that May Assist in Minnesota's Economic Recovery from the COVID-19 Pandemic*, Docket No. E,G999/CI-20-492, LIUNA Minnesota & North Dakota Comments 8 (Oct. 16, 2020)

¹⁷ *In the Matter of an Inquiry into Utility Investments that May Assist in Minnesota's Economic Recovery from the COVID-19 Pandemic*, Docket No. E,G999/CI-20-492, Xcel Energy Reply Comments 7 (Nov. 30, 2020).

¹⁸ Commission Order on Diversity Goals, at 7.

other initiatives because program metrics, in our view, are more easily calculable through enhanced reporting standards. In its March 16, 2021 Order, the Commission notes that its decision “does not preclude utilities from collaborating with community organizations” to develop benchmarks and ensure community-based benefits.¹⁹ In light of this, we encourage Xcel to continue to work with stakeholders to establish concrete participation benchmarks and metrics that can be used to reasonably evaluate the success of this Pilot Program. When Xcel files reports, the participation goals can be compared to demographic enrollment data and program success can be measured in relation to each class of participants. We are open to having additional conversations with Xcel on developing participation benchmarks and metrics that align with this recommendation.

IV. Conclusion

The Consumer Advocates appreciate the Commission’s continued efforts to promote Minnesota’s recovery from the COVID-19 pandemic and combat systemic inequities. We believe that with minor changes, the Company’s workforce development program can be a successful initiative that helps pave the way for a more equitable and racially diverse energy sector. Thank you for the opportunity to comment. In conclusion, the Consumer Advocates recommend that the Commission should:

1. Deny Xcel’s proposal to authorize an increase to the Low-Income Energy Discount Surcharge to fund the Workforce Development Pilot Program; and
2. Require the use of enhanced reporting mechanisms to track program participation and success.

Sincerely,

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¹⁹ *Id.*

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