



November 23, 2020

VIA ELECTRONIC FILING

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: In the Matter of an Xcel Payment Plan Credit Proposal
Docket No. E002/M-20-760

Dear Mr. Sueffert:

Please find the attached Reply Comments of the Energy CENTS Coalition and Citizens Utility Board of Minnesota in the above-referenced matter. If you have questions about these comments, please call me at 651-470-4500.

Sincerely,

Pam Marshall

Executive Director
Energy CENTS Coalition

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

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

In the Matter of an Xcel Payment Plan Credit Proposal

Docket No. E002/M-20-760

Reply Comments of the Energy CENTS Coalition and Citizens Utility Board of Minnesota

Introduction

As part of Xcel Energy's ("Xcel" or "the Company") economic recovery filing on September 15, 2020, the Company included a Payment Plan Credit Proposal ("Program") to address the increasing number of residential customers experiencing higher past-due bill levels and the decreasing number of payment plans established with past-due customers.¹ On September 30, 2020, the Company filed this proposal in the present docket. Xcel proposes a \$17.5 million Program to provide a 75% credit toward past due bills and payment arrangements to customers with current past-due balances between \$1,000 and \$4,000.

Parties, including the Energy CENTS Coalition ("ECC") and Citizens Utility Board of Minnesota ("CUB"), filed Initial Comments on November 6, 2020. In those comments, ECC and CUB recommended that the Company modify the Program payment terms to remove participants only after two consecutive missed monthly payments. With this modification, ECC and CUB recommended that the Commission approve the Program and the Company's proposed cost recovery method. ECC and CUB further recommended that the Commission establish a reporting process to evaluate the Program's effectiveness.

ECC and CUB continue to support Xcel's proposed design, including program eligibility, outreach plan, payment terms (as modified) and cost-recovery method. At this time, the Company's proposed Program is the *only* program proposed in response to COVID-19 and the related economic downturn. Xcel's Program offers a substantial financial benefit to past-due customers and seeks to avoid the potential loss of utility service when service disconnections are no longer suspended. ECC and CUB respectfully recommend that the Commission approve this program as soon as possible.

ECC and CUB provide the following responses to Comments by Fresh Energy ("FE"), National Housing Trust ("NHT"), and Natural Resources Defense Council ("NRDC"), the Minnesota Department of Commerce Division of Energy Resources ("the Department" or "DOC"), and the Office of the Attorney General ("OAG").

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.

Response to Fresh Energy, National Housing Trust and Natural Resources Defense Council

Program eligibility and design

Under Xcel’s proposal, customers with past-due bills between \$1,000 and \$4,000 (approximately 11,600 customers) are eligible to receive a 75% credit. For several reasons, ECC and CUB continue to support Xcel’s eligibility criteria. First, these customers are the most significantly past-due, increasing the risk for service disconnection when the current disconnection moratorium ends. ECC and CUB believe that Xcel has proposed a Program that balances the need to provide a substantial financial benefit to a significant number of customers while minimizing the impact on other ratepayers. Second, delineating Program eligibility in this concise way allows Xcel to better manage the Program budget and participation levels.

Finally, as indicated in the table provided by the Department, the proposed eligible customers represent only 11.3% of the total number of past-due customers. At the same time, however, they represent 42% of the total past-due dollar amount.

	# of Accounts	As a % of Total Accounts	Amount Past Due	As a % of Total Past Due Amount
\$0-\$199	70,925	43.1%	\$8,400,411	9.9%
\$200-\$499	49,287	30.0%	\$15,649,630	18.4%
\$500-\$999	24,065	14.6%	\$16,860,380	19.8%
\$1,000-\$1,999	13,236	8.0%	\$18,433,680	21.7%
\$2,000-\$2,999	4,123	2.5%	\$9,957,472	11.7%
\$3,000-\$3,999	1,334	0.8%	\$4,562,232	5.4%
Over \$4,000	1,459	0.9%	\$11,240,254	13.2%
Total	164,429	100.0%	\$85,103,059	100.0%

Source: Minnesota Department of Commerce Comments, p. 3.

In their comments, FE, NHT, and NRDC (“FE, et al.”) recommend that “the program should be available to all residential customers.” At the same time, they state that “we believe that it is important to consider household income levels in this program. In our view, 200% of Federal Poverty Level is a reasonable income threshold.”² It is unclear to ECC and CUB how incorporating this income eligible criteria will make the Program available to “all residential customers.”

ECC and CUB believe Xcel has targeted the appropriate group of customers for the relief that the Program can provide.

FE, et al., however, recommend that the Program should be offered as a percentage of income program. They state that “it is important to consider household income levels . . . [and] a reasonable program

² Comments, Fresh Energy, National Housing Trust (NHT), and Natural Resources Defense Council (NRDC), Docket No. E002/M-20-760, November 6, 2020, p. 2.

design would aim to significantly lower the percentage of household income that is dedicated to energy costs.”³

Xcel’s proposed Program does not require income-eligibility and is, therefore, able to reach customers who may not be eligible for existing, means-tested programs. Requiring Xcel to determine income, develop a percentage of income monthly payment amount, renegotiate all existing payment arrangements based on a percentage of income, and monitor a budget when participants can miss four monthly payments (as suggested by FE, et al.)⁴, would add extensive administrative burdens and costs. ECC and CUB believe that Xcel’s current program is meant to supplement existing programs and to offer credit incentives to customers who may not qualify for those existing programs, to help customers sustain payments toward sizeable past-due bills, and to avoid service interruptions when the disconnection suspension is lifted. As described further below, the Commission should reject the program design recommendations offered by FE, et al.

Further, FE, et al., recommend that Xcel’s Program should “reach the most in-need customers by offering a higher dollar amount of assistance to extremely low-income households, for example those at 50% of Federal Poverty Level or lower . . . to significantly lower the percentage of household income that is dedicated to energy costs, ideally to no more than 3% per fuel.”⁵

However, this recommendation would require a level of funding not contemplated in the proposed Program. The following hypothetical example, using 100% of Federal Poverty, a 3% electric bill standard, and an assumed \$700 annual electric bill, illustrates this point:

Past Due Customers	100% Federal Poverty	Average Annual Electric Bill	Required Funding (3% of income)
\$200-\$499 (33,022)*			
\$500-\$999 (24,065)	\$12,760	\$700	\$18.1 million
57,087 total customers			

*Assumes two-thirds of the total 49,287 are behind between \$300 and \$900 (FE, et. al. recommendation)

$$\$12,760 \times .03 = \$382.80 / \$700 - \$382.80 = \$317.20 \text{ (electric bill at 3\% of income)} / \$317.20 \times 57,087$$

Importantly, this level of funding would be required *before* any assistance could be provided to customers that owe more than \$1,000 and *without* the inclusion of the additional administrative costs required for calculating credits and payment arrangements based on individual customers’ household income.

The program changes proposed by FE, et al. essentially replicate Xcel’s POWER On program, which is not the appropriate model for the Payment Plan Credit Program that is designed to provide temporary, one-time assistance to help customers experiencing COVID-related financial hardship.

Xcel proposes to assist past-due customers who may not qualify for LIHEAP and POWER On, thereby extending the available resources to more past-due customers. At the same time, Xcel will refer the prospective participants to LIHEAP and POWER On and any enrollment in those programs will mean more of the proposed \$17.5 million remains available to provide bill credits to additional past-due customers.

³ *Id.* By definition, a percentage of income program provides larger benefits to lower-income households.

⁴ *Id.*

⁵ *Id.*

Program Outreach

ECC and CUB support Xcel's proposal to promote the Program to the 11,600 customers who are between \$1,000-\$4,000 past-due. Because these customers are already identified, the Company's initial proposed outreach effort—direct communication with these customers—is the most efficient and cost-effective approach. Therefore, ECC and CUB do not believe it is necessary, as recommended FE, et al., to require Xcel to:

[partner] with community-based organizations, Community Action Partnership (CAP) agencies, and other service providers to share information about the new payment plan program [and to give] . . . organizations and agencies . . . necessary funding and information in order to have sufficient capacity to engage in outreach and communications efforts on behalf of this program.⁶

Further, in Initial Comments, ECC and CUB proposed reporting recommendations, including a report four months after Program implementation. ECC and CUB recommend that Parties review that report before making changes to Xcel's original outreach plan. At the point of the proposed four-month report, more customers may be eligible for the Program and it is likely, therefore, that Xcel should continue to contact those customers directly.

In addition, Xcel can inform community-based organizations about this program with minimal effort and cost. Those organizations and agencies, in turn, should refer any customers to Xcel since the Company will be providing customers with specific credit and payment amounts, to explain Program terms, and to establish individualized payment arrangements. For example, if LIHEAP customers are over-income for LIHEAP but are past-due, agencies can refer those customers to Xcel. If, in a further example, LIHEAP customers are ineligible for POWER On, ECC will refer those customers to this Program. These types of referral are different than outreach and are already offered on a regular basis. These referrals do not require additional financial assistance since the organizations are already interacting with the customer.

Finally, it is critical that the proposed Program funding is used primarily for bill credits to past-due customers. Particularly since this Program is designed as a temporary form of relief, funds should not be diverted to create an external outreach infrastructure that requires customers to interact with Xcel anyway.

Program reporting

Xcel's proposed Payment Plan Credit Program is distinct from POWER On, the Low-Income Discount and the Medical Assistance Programs. Those programs are permanent while the Payment Credit Plan Program is a response to the current economic hardship caused by COVID-19 and the past-due bills that have accumulated because of that hardship. In Docket No. 20-375, the Consumer Advocates recommended that the Commission affirm that Docket as the ongoing and standardized representation of residential customer inability to pay indicators. Based on this recommendation, the Consumer Advocates further recommended that any financial relief proposals to address those indicators should be considered in separate dockets.

⁶ *Id.*, at 4.

ECC and CUB continue to recommend separate dockets for proposed programs like Xcel's. Separate dockets are appropriate for designing distinct programs that acknowledge, and incorporate, the particular circumstances of the respective utilities.

Contrary to the assertion by FE et al, ECC and CUB do not believe that reporting in multiple dockets "will help streamline" the ability of stakeholders "to review information regarding the program in concert with other considerations regarding customer protections during the COVID-19 pandemic and recovery period."⁷

ECC and CUB believe that the Commission's decision to open a comment period about this proposal in a separate docket was appropriate, focuses the discussion on the specific program, and provides the most distinct process for that discussion. Particularly for organizations with limited financial resources, establishing separate dockets allows those organizations to participate in independent dockets without having to track and potentially comment in multiple dockets.

Cost-recovery discussion

The Department and the Office of the Attorney General (OAG) recommend that the Commission require Xcel shareholders to contribute one-half of the proposed \$17.5 Program budget. ECC and CUB respectfully disagree.

First, the proposed funding level (\$17.5 million) is limited to only two years and increases residential customer bills by \$6.12 per year or 51 cents per month. Further, the percentage increase is relatively consistent for both residential and C&I customers. Second, the Program provides a form of rate relief and, as such, should be treated like other Xcel rate relief programs—the Low-Income Discount, POWER On, Medical Assistance Program (MAP) and Gas Affordability Program (GAP)—and other electric utility programs such as Minnesota Power's CARE Program. Those programs, including cost-recovery, have been approved by the Commission. ECC and CUB do not believe there is any reason to distinguish Xcel's Payment Plan Credit Program from other existing low-income programs and, therefore, recommend that the Commission approve Xcel's cost-recovery method.

Further, DOC's recommendation for shareholder contribution appears to be based on the concern for customers who are "financially struggling at this time."⁸ It is true that an overwhelming number of Minnesotans are experiencing economic hardship because of the pandemic and ECC and CUB are not dismissing the impact of adding 51 cents to the monthly bills for any residential customer. At the same time, that increase is not parallel to households' past-due utility bills, rent or mortgage payments, or the rising costs for food. ECC and CUB do not think the proposed increase contributes significantly to the level of economic hardship experienced by an increasing number of Xcel residential customers.

Most importantly, the relatively minor increase to fund Xcel's Payment Plan Credit Program provides a *direct* financial benefit to Xcel's customers that are struggling financially. From ECC and CUB's perspective, the amount of financial benefit to these customers outweighs the 51 cent per month increase to fund this Program. Finally, doing nothing to help customers who currently owe between \$1,000 and \$4,000 will likely cost customers more in the longer term.

⁷ *Id.*

⁸ Comments of the Minnesota Department of Commerce, Division of Energy Resources, November 6, 2020, p. 6.

Conclusion

ECC and CUB respectfully request that the Commission:

- 1) Approve Xcel's Program, with the modifications and reporting requirements outlined in our initial comments, and the Company's cost-recovery method, as proposed.
- 2) Reject Fresh Energy, National Housing Trust, and National Resources Defense Council recommendations regarding Program eligibility, design, outreach, and reporting

Respectfully submitted,

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November 23, 2020

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AFFIDAVIT OF SERVICE

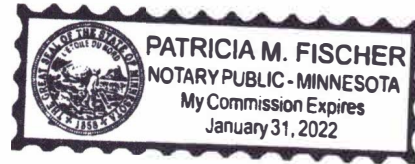
Pam Marshall certifies that on the 23rd day of November 2020, she served, by electronic filing, Reply Comments on behalf of the Energy CENTS Coalition and Citizens Utility Board of Minnesota, In the Matter of an Xcel Payment Plan Credit Proposal, Docket No. E002/M-20-760, to the individuals on the attached service list.

Pam Marshall

Pam Marshall

Patricia Fischer

Patty Fischer



Subscribed and sworn to before me
this 23rd day of November 2020

Notary Public

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