

April 30, 2020

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket Nos. G004/M-20-395, G011/M-20-397, G002/M-20-398, G008/M-20-399, and G022/M-20-400.

Dear Mr. Seuffert:

Attached are the Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department), in the following matter:

The Annual Gas Affordability Program (GAP) Report for:

- Great Plains Natural Gas Company;
- Minnesota Energy Resources Corporation;
- Northern States Power Company;
- CenterPoint Energy Minnesota Gas; and;
- Greater Minnesota Gas, Inc.

The Reports were filed on March 31, 2020 by:

CenterPoint Energy Minnesota Gas
Amber S. Lee, Director of Regulatory Affairs
505 Nicollet Mall
PO Box 59038
Minneapolis, MN 55459
(612) 321-4625

Northern States Power Company
Bridget Dockter, Manager, Policy and Outreach
414 Nicollet Mall
Minneapolis, Minnesota 55401
bridget.dockter@xcelenergy.com
(612) 337-2096

Docket Nos. Docket Nos. G004/M-20-395, G011/M-20-397, G002/M-20-398, G008/M-20-399, and G022/M-20-400

Analyst assigned: Daniel Beckett

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Great Plains Natural Gas Company

Travis R. Jacobson, Director of Regulatory Affairs

705 West Fir Avenue

Fergus Falls, MN 56538-0176

(701) 222-7855

Minnesota Energy Resources Corporation

Joylyn Hoffman Malueg, Project Specialist 3

231 Michigan Street

Public Service Building – P321

Milwaukee, WI 53203

(414) 221-4208

Greater Minnesota Gas, Incorporated

Kristine A. Anderson, Esq., Corporate Attorney

1900 Cardinal Lane

P.O. Box 798

Faribault, MN 55021

kanderson@greatermngas.com

(507) 209-2110

The Department recommends that the Minnesota Public Utilities Commission (Commission) **accept** the utilities' reports, as well as **approve** the requests by CenterPoint Energy and Great Plains Natural Gas to adjust their surcharge rates. The Department is available to answer any questions that the Commission may have in this matter.

Sincerely,

/s/ DANIEL W. BECKETT

Rates Analyst

DWB/ja

Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket Nos. G004/M-20-395, G011/M-20-397,
G002/M-20-398, G008/M-20-399, and G022/M-20-400.

I. INTRODUCTION

Gas Affordability Programs (GAPs) are governed by Minnesota Statutes 216B.16, Subdivision 15. These programs are designed to reduce the proportion of income that low income customers dedicate to paying their energy bills. Under a GAP, a customer participant makes more frequent bill payments and receives assistance with payments in arrears that they may have. The GAP must be administered such that it reduces the utilities' collection activity costs and effectively coordinates with conservation resources and other applicable low-income bill payment assistance programs. Each Minnesota public utility administering a GAP submits an annual report containing the required statistics and information relevant to the program's performance over the preceding year. In 2020, five natural gas utilities with a GAP submitted their annual reports in the following dockets:

- Great Plains Natural Gas Company (Great Plains), G004/M-20-395;
- Minnesota Energy Resources Corporation (MERC), G011/M-20-397;
- Xcel Energy (Xcel), G002/M-20-398;
- CenterPoint Energy (CenterPoint), G008/M-20-399; and
- Greater Minnesota Gas, Inc. (GMG), G022/M-20-400.

The annual GAP reports enable the Minnesota Public Utilities Commission (Commission) to monitor the utilities' administration of these affordability programs in the years between the GAP Evaluation Reports, which cover multiple program years.

II. DEPARTMENT ANALYSIS

The Minnesota Department of Commerce, Division of Energy Resources (Department) reviews the annual GAP reports to determine whether they comply with the reporting requirements as outlined in statutes or Commission Order. A list of the reporting requirements is provided as Attachment No. 1 to these Comments.

A. SUMMARY SCHEDULE INFORMATION – REQUIRED FOR ALL UTILITIES WITH A GAP

Each utility administering a GAP is required to submit a set of summary schedule information in its annual GAP filing. Table 1 below combines the summary schedule information provided in the 2019 GAP reports. Dollar values and percentages in Table 1 were rounded to the nearest whole number.

Based on its review of the current GAP reports, the Department concludes that the required summary schedule information was properly included in the associated filings.

Table 1: Summary Schedule GAP Information Reported for the 2019 Program Year

Summary Schedule Item	CenterPoint	Xcel Energy	Great Plains	MERC	GMG
	Units in Dollars \$				
Average annual affordability benefit received per customer	383	155	216	422	340
Average annual arrearage forgiveness benefit received per customer	240	390	86	52 ¹	21
Annual program budget	5,000,000	2,500,000	50,000	750,000	20,000
Actual program revenue	4,242,706	3,037,138	41,426	1,293,790	0
Actual program cost	4,481,864	2,941,601	73,807	661,786	14,287
GAP tracker balance as of year end	4,688,151	1,429,657	(5,007)	110,651	49,577
GAP rate-affordability surcharge per therm	0.00000	0.00445	0.01393	0.00905	0
<i>Non-GAP LIHEAP Baseline Disconnection Rates</i>	Units in Percentage %				
1) GAP participants	2	3	2	1	0
2) Non-GAP LIHEAP customers	6	8	14	13	0
3) Non-LIHEAP residential customers	3	1	3	2	<1
<i>Pre-Program Baseline Disconnection Rates</i>					
1) GAP participant cohort	4	2	2	3	N/A
2) GAP participant cohort before enrolling in GAP	2	7	2	8	N/A
% of LIHEAP customers that participated in GAP	33	48	19	13	27
	Units in Number of Participants				
GAP participants enrolled as of year end	7,935	6,489	250	1,335	25
GAP participants enrolled and receiving benefits at some time during the year	11,067	9,675	322	1,432	29

¹ The Department notes that these average annual arrearage benefits can fluctuate quite a bit from year to year, sometimes decreasing and other times increasing.

The Commission's September 28, 2018 *Order Accepting Report and Adopting Streamlined Process* states: "The Commission hereby adopts the streamlined reporting format in Attachment A of the Stakeholder Utility Report." Attachment A requires utilities to report disconnection rates for the following customer groups: GAP customers, LIHEAP-Non GAP customers, and Non-LIHEAP residential customers. Previous to the September 28, 2018 Order, utilities were required to provide the disconnection rates for (a) GAP customers, (b) LIHEAP – Non GAP customers, and (c) non-LIHEAP customers (all firm customers including C&I)." Some utilities failed to note the subtle reporting requirement change and reported disconnection rates for non-LIHEAP customers (all firm customers including C&I), in this case Great Plains and Greater Minnesota Gas; while other utilities reported disconnection rates for non-LIHEAP Residential customers. The Department notes that since LIHEAP and GAP are residential-specific programs, the disconnection rate for non-LIHEAP residential customers is more useful for program evaluation purposes than the disconnection rate for all non-LIHEAP firm customers. Further, the non-GAP LIHEAP Baseline reporting for both payment frequency and customer arrearage uses non-LIHEAP residential customers, rather than non-LIHEAP firm customers. The Department concludes that reporting the disconnection rate for non-LIHEAP residential customers is more relevant to program evaluation and more consistent with the other reporting requirements. Therefore, the Department continues to support the reporting requirement as stated in the Commission's September 28, 2018 Order.

B. SELECT STATISTICS AND OTHER PROGRAM INFORMATION – REQUIRED FOR ALL UTILITIES WITH A GAP EXCEPT GMG

Utilities that administer a GAP are required to include certain statistics and program information beyond the summary schedule data in their annual GAP reports. The following sections 1 – 7 provide a brief explanation of the information requirements and the select GAP data submitted by each of the relevant utilities. The Department concludes that the GAP information discussed in sections 1 – 7 was provided by the utilities as required.

1. Payment Frequency

Utilities are required to report on how and to what extent their GAP impacts customer payment frequency. Specifically, utilities must submit information that includes (1) a comparison of the customer payment frequency before and after the customer was enrolled in the GAP, (2) a comparison of the customer payment frequency for GAP versus LIHEAP grant recipients, and (3) partial and late payment information as it relates to the required payment frequency data. A utility may elect to provide supplementary payment frequency information that is not specifically required. The following payment frequency measures and the information in Table 2 summarize the relevant data provided by the utilities for the GAP year 2019.² Note that amounts over 100% reflect that energy assistance dollars in addition to customer payments can result in a credit balance on the customer's account.

² Where: A = dollars paid ÷ dollars requested; and B = number of payments paid ÷ number of payments requested.

Table 2: GAP Payment Frequency Statistics for the 2019 Program Year

<i>Customer Group</i>	<i>Payment Frequency Percentage</i>	<i>CenterPoint</i>	<i>Xcel Energy</i>	<i>Great Plains</i>	<i>MERC</i>
<i>Non-GAP LIHEAP Baseline</i>		<i>Units in Percentage %</i>			
1) GAP participants	A	34	97	64	68
	B	74	81	56	165
2) Non-GAP LIHEAP customers	A	37	101	26	114
	B	55	78	33	113
3) Non-LIHEAP residential customers	A	89	98	100	89
	B	88	91	79	91
<i>Pre-Program Baseline</i>					
1) GAP participant cohort	A	33	105	64	139
	B	31	82	56	135
2) GAP participant cohort before enrolling in GAP	A	18	91	32	146
	B	48	78	42	139

2. Payment Amounts

The annual GAP reports must include information about the effect of the GAP on payment amounts. At a minimum, the GAP report payment amount data must incorporate the average annual and monthly bill credit amounts compared to the average GAP participant’s annual and average monthly bill and arrearage. Table 3 below provides a summary of the annual payment amount data submitted by the relevant utilities for the GAP year 2019.

Table 3: GAP Payment Amount Statistics for the 2019 Program Year

<i>Payment Amount Statistic</i>	<i>CenterPoint</i>	<i>Xcel Energy</i>	<i>Great Plains</i>	<i>MERC</i>
<i>Units in Dollars \$</i>				
A: Average annual affordability benefit per participant	383	155	216	417
B: Average annual arrearage forgiveness benefit per participant	240	390	86	52
C: Average total benefit per participant	622	288	218	422
D: Average annual bill per participant	931	1,024	735	896
E: Average arrearage balance per participant	490	202	178	-844 ³
<i>Units in Percentage %</i>				

³ MERC stated in its Report that “the average arrearage (account balance) includes account balances for those customers who have participated in the Program for more than two years and who successfully eliminated their pre-Program arrears and may have a significant credit balance. Because MERC has had an increasing number of accounts in which the total credit balance exceeds the total arrears balance, the average account balance continues to be a growing negative number (i.e. credit). There were approximately 480 customers at the end of 2019 with credit balances greater than \$500.”

(A/D) = average annual affordability benefit as a percentage of the average annual bill	41	15	29	47
(B/D) = average annual arrearage forgiveness benefit as a percentage of the average annual bill	26	38	12	6
(C/D) = average total benefit as a percentage of the average annual bill	67	28	30	47
(B/E) = average annual arrearage forgiveness benefit as a percentage of average arrearage balance per participant	49	193 ⁴	48	-6

3. Payments In Arrears

The GAP impacts the level of customer payments in arrears; utilities administering a GAP must report the change in arrearage levels between the last two program years for certain customer classes. Table 4 summarizes the data provided by the utilities on payments in arrears for program year 2019. In Table 4, negative values indicate that the arrearage level decreased, while positive figures denote an increase in arrearage level.

Table 4: Percentage Change in Dollar Amount of Payments in Arrears from 2018 - 2019

<i>Customer Group</i>	<i>CenterPoint</i>	<i>Xcel Energy</i>	<i>Great Plains</i>	<i>MERC</i>
<i>Non-Gap LIHEAP Baseline</i>	<i>Units in Percentage %</i>			
1) GAP participant	0	-53	6	9
2) Non-GAP LIHEAP customer	-7	3	-50	23
3) Non-LIHEAP residential customer	-9	16	28	7

4. Program Retention

Applicable utilities must report the GAP participant retention rate for the relevant program year. The utilities provided the following retention rates, as a percentage, for the program year 2019:

- CenterPoint – 77%
- Xcel Energy – 67%
- Great Plains – 78%
- MERC – 93%

⁴ The Department notes that, Xcel calculates the annual average arrearage benefit by dividing the current year-to-date total balance by the number of participants. The year-over-year increase in the numerator was much larger and in the opposite direction than the denominator, leading to an annual average arrearage benefit of \$390 per participant, compared with \$200 in 2018. The magnitude of the change in annual average arrearage benefit was greater than the magnitude of change in average arrearage balance per participant, and was also in the opposite direction.

5. Customer Complaints

The annual GAP reports must include information on the number and type of customer complaints associated with the program and received by the utilities during the program year. Xcel Energy and MERC each reported zero customer complaints for program year 2019. CenterPoint recorded four customer complaints and described these complaints as a combination of billing questions, inquiries regarding general GAP information, requests for payment extensions, and questions about the customers’ removal from GAP. Great Plains received one customer complaint in 2019 and stated that a customer did not understand entirely the terms of the GAP program.

6. Collections

GAP reporting guidelines require that the relevant utilities submit information about how the number of payments required of participants under the program have affected the utilities’ collection activity. Through a review of their collection activity or related data points, CenterPoint, Xcel Energy, Great Plains, and MERC all concluded that the increased number of payments received by GAP participants has correspondingly reduced the companies’ collection activities.

7. Coordination With Other Resources

Each applicable utility provided a summary on its coordination efforts with other resources and assistance programs related to the administration of the GAP. This required information is further condensed and presented in Table 5 below.

Table 5: Coordination Efforts with other Resources for GAP Administration in the 2019 Program Year

<i>Utility</i>	<i>Summary of Coordination Efforts</i>
CenterPoint	<ul style="list-style-type: none"> • Coordinated with conservation programs, Hennepin County, Benton County, Sherburne County, Stearns County, and other organizations
Xcel Energy	<ul style="list-style-type: none"> • Coordinated with Energy CENTS Coalition (ECC) to improve communication and outreach to low-income households • Participated in Safety Net Meetings with Ramsey County and the quarterly MN Energy Assistance Policy Action Committee
Great Plains	<ul style="list-style-type: none"> • Communicated with and provided of GAP applications to energy and billing assistance agencies within service territory • Provided information on the GAP and the associated application to customers previously receiving or currently applying for energy assistance through other programs

MERC	<ul style="list-style-type: none"> • Coordinated with the Salvation Army for administration of GAP and other supporting services; the Salvation Army provides GAP participants with referrals to a variety of other programs, including energy, food, rental, and financial planning assistance • Communicated with the Minnesota Energy Assistance program to refer assistance recipients to GAP
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C. SELECT STATISTICS AND OTHER PROGRAM INFORMATION FOR CENTERPOINT

CenterPoint is required to include two additional information items beyond the disclosures prescribed for other natural gas utilities.

1. Conservation Measures

The Department concludes that CenterPoint provided the required conservation measures information. The Department summarizes the provided information in the table below.

Table 6: CenterPoint’s Conservation Measures for GAP in Program Year 2019

<i>Item</i>	<i>Description</i>
Potential no-cost conservation measures that could be implemented in the households of GAP participants, either on their own or part of its Conservation Improvement Program	<ul style="list-style-type: none"> • Lowering thermostat and/or installing a programmable unit • Changing furnace filters regularly • Lowering water heater setting • Opening and closing drapes according to season and time of day • Maintaining open air flow around heating registers • High-efficiency showerhead and faucet aerator • Window, door, and attic hatch weather-stripping • Home energy audit; weatherization • Furnace repair/replacement/tune-up • Boiler repair/replacement/tune-up • Pipe and water heater insulation • Water heater replacement
Plans to encourage GAP participants to increase their use of these measures	Cross-promotion of programs with GAP

2. Customer Eligibility

The Department concludes that CenterPoint has provided the required customer eligibility information. For 2019, CenterPoint found that 1,970 customers applied for GAP but did not qualify for credits.

3. Request to Increase Program Surcharge

The Commission's August 19, 2019 Order in Docket No. G008/M-19-255 required CenterPoint to evaluate annually its GAP surcharge rate based on forecasted GAP expenditures and rate-case approved sales.⁵ In the instant proceeding, CenterPoint proposed to increase its GAP surcharge rate from \$0.0000 per Dth to \$0.0236, effective September 1, 2020. The goal of the proposed change in GAP surcharge rate is to bring the GAP tracker balance as close to zero as possible over the forecasted time-period, here being September 2020 to December 2021. Schedules E and F attached to CenterPoint's filing show that, when using applicable forecasted sales and proposed GAP surcharge rate, the ending balance of the tracker account on December 2021 is forecasted to be an approximate over-recovered amount of \$897. Without the proposed change in the surcharge rate, the forecasted ending tracker balance would be an approximate under-recovered amount of \$348,680 by December 2021.⁶

The Department agrees with CenterPoint's assessment of its GAP surcharge rate and the need to adjust it so as to more closely reach a balance of zero by December 2021. The Department recommends that the Commission approve CenterPoint's request to adjust its GAP tracker surcharge rate.

D. SELECT STATISTICS AND OTHER PROGRAM INFORMATION FOR GREAT PLAINS

Great Plains must include three information points in its annual GAP report in addition to the data requirements that apply to multiple utilities.⁷ The following three sections outline the GAP participation rate, cost, and overall evaluations provided by Great Plains. The Department concludes that Great Plains complied with the additional reporting guidelines as required.

1. Participation Rate Evaluation

In calendar year 2019, Great Plains received 503 GAP applications, of which 332 participants were ultimately enrolled. The 503 applications represented a 23 percent increase year-over-year. In 2019, Great Plains retained participants in GAP at a rate of 78 percent, a slightly higher rate when compared with 71 percent in 2018. Additionally, Great Plains stated that in 2018 and 2019 GAP program years, all LIHEAP or other assistance funds were considered for customer payments. This was a change from

⁵ *Order*, p. 2, Order Point 3.

⁶ Schedule F, p. 1, line 3 under "Dec 21" column in CenterPoint's filing.

⁷ *Order Approving Petition with Modifications* issued May 12, 2008 in Docket No. G004/M-07-1235.

prior practice and resulted in: (1) more applicants qualifying for and not being removed from the program; and (2) more customers qualifying for arrearage forgiveness.

2. Cost Evaluation

Great Plains is required to provide the actual annual average cost per participant for the Program, and a discussion concerning any deviation of the actual annual average cost per participant compared to the assumed average annual cost per participant of \$555. In 2019, the average annual bill for a GAP participant was \$735, representing an increase from the previous year, and an increase over the initially established assumed average annual cost of \$555. After adjusting for inflation, the difference between the average annual bill for a GAP participant in 2019 was approximately \$67 more than the original baseline assumption of \$555. Great Plains stated that colder than usual weather contributed to the increase in 2019. In 2019 GAP program year, the annual average arrearage balance per participant was \$178, the average affordability benefit was \$216, and the annual average arrearage benefit was \$86, resulting in an annual average total benefit per customer of \$218. The total average annual benefit per customer, in real terms, represents an approximately 58 percent increase over the 2018 total.

3. Overall Evaluation

As stated above, Great Plains made a change to its GAP program beginning in 2018 that resulted in a larger number of participants. In its filing, Great Plains requested to increase its surcharge from \$0.01393 to \$0.02295, an approximately 65 percent increase. In its previous annual GAP filing, Great Plains stated that it would reevaluate its surcharge in its GAP program Evaluation Report, Docket No. G004/M-19-366, which was filed May 31, 2019. In that proceeding, Great Plains stated that its foregoing surcharge of \$0.01393 was sufficient, given that its tracker balance at 2018 year-end totaled \$27,373.75, even when considering an assumed increase in a program participation rate from 10 to 15 percent.⁸ The Commission's January 17, 2020 Order in that proceeding approved Great Plains' proposal to maintain its current surcharge and to continue evaluation of the rate charged to firm residential and general service customers.⁹

In the instant proceeding, Great Plains stated that it has increased its assumed participation rate from 15 to 21 percent, given the difference in actual versus estimated participation in 2019. Given the increase in participation, Great Plains stated that a subsequent increase in the budget, from \$50,000 to \$70,000, would be necessary. Based on projected 2020 firm sales of 3,040,734 dekatherms, an estimated 323 participants, an estimated \$200 benefit per participant, and a rounded budget of \$70,000, which includes a 5 percent administrative cost,¹⁰ results in an increase of the surcharge rate from \$0.01393 to \$0.02295.¹¹

⁸ Docket No. G004/M-19-366, p. 8.

⁹ *Order Approving Periodic Gas Affordability Program Evaluation Reports and Other Action*, p. 5, Order Point 3.

¹⁰ Minnesota Stat. § 216B.16, subd. 15 indicates that "The commission may not allow a utility to recover administrative costs, excluding start-up costs, in excess of five percent of total program costs, or program evaluation costs in excess of two percent of total program costs."

¹¹ $3,050,734 \times \$0.02295 = \$70,014.35$. See Attachment B of Great Plains' Report.

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Analyst assigned: Daniel Beckett

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The Department agrees with Great Plains' assessment of its surcharge and recommends the Commission approve the request to increase it, along with the proposed increase to its GAP budget from \$50,000 to \$70,000, with the caveat that the administrative costs included in the tracker reflect actual administrative costs incurred, up to the 5% limit set by Minnesota Statutes § 216B.16, subd. 15.

III. CONCLUSION AND RECOMMENDATIONS

The Department recommends that the Commission:

- Accept the utilities' reports;
- Approve CenterPoint's request to adjust its GAP surcharge rate; and
- Approve Great Plains' request to adjust its GAP surcharge rate and correspondingly increase its annual GAP budget, with the understanding that the administrative costs included in the tracker reflect actual administrative costs incurred, up to the 5% limit set by Minnesota Statutes § 216B.16, subd. 15.

The Department also requests that all utilities fully comply with the Commission's September 28, 2018 Order, particularly noting that the disconnection rate reporting is to reflect non-LIHEAP residential customers and not non-LIHEAP firm (including C&I) customers.

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Department Attachment 1 - Requirements for 2019 Annual GAP Reports
Docket Nos. G004/M-20-395, G011/M-20-397, G002/M-20-398, G008/M-20-399, and
G022/M-20-400

All Utilities	
Summary Schedule	<p>A summary schedule containing the:</p> <ul style="list-style-type: none"> • Average annual affordability benefit received per customer • Average annual arrearage forgiveness benefit received per customer • Annual program budget • Actual program revenue • Actual program cost for all utilities except GMG • GAP tracker balance as of year-end • GAP rate-affordability surcharge (\$/therm) • Disconnection rates for GAP customers, non-GAP LIHEAP customers, and non-LIHEAP residential customers • Percentage of LIHEAP customers that participated in GAP • Number of GAP participants enrolled as of year-end • Number of GAP participants enrolled and receiving benefits at some time during the year
All Utilities Except GMG	
Payment Frequency	The effect of the GAP on customer payment frequency, including at a minimum a comparison of the payment frequency for customers in GAP to the payment frequency before they were enrolled in GAP, plus a comparison of the payment frequency for GAP participants to the payment frequency for LIHEAP grant recipients. The information reported on customer payment frequency must incorporate partial and late payment information.
Payment Amounts	The effect of the GAP on payment amounts, including at a minimum the average annual and monthly bill credit amount, compared to the average GAP participant's annual and average monthly bill and arrearage amount.
Arrears	The effect of the GAP on the number of customers in arrears, and the effect of GAP on arrearage levels— the latter including at a minimum the change in the arrearage level for the average GAP customer compared to the LIHEAP customers that are not enrolled in the GAP and the average level of arrearage for all of the utility's residential customers.
Retention	The effect of the GAP on retention rates.
Complaints	The effect of the GAP on customer complaints, and data on the type and number of complaints.
Collections	The effect of the GAP on utility collection activity.
Coordination	Information relating to how each utility has coordinated its GAP with other available low-income and conservation resources, naming the agencies the utility has coordinated with, how often the utility has communicated with those agencies during the year, the content of those communications, and what was accomplished in terms of coordination.
CenterPoint Only	

Conservation Measures	The potential no, low, and mid-cost conservation measures that could be implemented in the households of GAP participants, along with CenterPoint's plans to encourage GAP participants to increase their use of these measures.
Customer Eligibility	The number of customers who do not qualify for credits, including zero credit customers.
Great Plains Only	
Participation Rate Evaluation	An evaluation of the assumed GAP participation rate of five percent in light of actual participation in the program.
Cost Evaluation	The actual annual average cost per participant for the program and a discussion concerning any deviation of the actual annual average cost per participant compared to the assumed average annual cost per participant of \$555.
Overall Evaluation	Conclusion regarding the reported evaluation data and proposal concerning the GAP on an ongoing basis.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce

Comments

Docket No. G004/M-20-395, G011/M-20-397, G002/M-20-398, and G022/M-20-400

Dated this **30th** day of **April 2020**

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-395_M-20-395
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_20-395_M-20-395
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St Bismarck, ND 58501	Electronic Service	No	OFF_SL_20-395_M-20-395
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-395_M-20-395
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-395_M-20-395
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-395_M-20-395

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_20-397_M-20-397
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-397_M-20-397
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_20-397_M-20-397
Daryll	Fuentes	dfuentes@usg.com	USG Corporation	550 W Adams St Chicago, IL 60661	Electronic Service	No	OFF_SL_20-397_M-20-397
Joylyn C	Hoffman Malueg	Joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources	2685 145th St W Rosemount, MN 55068	Electronic Service	No	OFF_SL_20-397_M-20-397
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-397_M-20-397
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-397_M-20-397
Catherine	Phillips	catherine.phillips@we-energies.com	We Energies	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_20-397_M-20-397
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-397_M-20-397
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-397_M-20-397

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-397_M-20-397
Colleen	Sipiorski	Colleen.Sipiorski@wecenergygroup.com	Minnesota Energy Resources Corporation	700 North Adams St Green Bay, WI 54307	Electronic Service	No	OFF_SL_20-397_M-20-397
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-397_M-20-397
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_20-397_M-20-397
Mary	Wolter	mary.wolter@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_20-397_M-20-397

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Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_20-398_M-20-398
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_20-398_M-20-398
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-398_M-20-398
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_20-398_M-20-398
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_20-398_M-20-398
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_20-398_M-20-398
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_20-398_M-20-398
Annete	Henkel	mui@mnuilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-398_M-20-398
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Electronic Service	No	OFF_SL_20-398_M-20-398
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	No	OFF_SL_20-398_M-20-398

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Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-398_M-20-398
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-398_M-20-398
Michael	Krikava	mkrikava@taftlaw.com	TAFT Stettinius & Hollister, LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-398_M-20-398
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_20-398_M-20-398
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	No	OFF_SL_20-398_M-20-398
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_20-398_M-20-398
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_20-398_M-20-398
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-398_M-20-398
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_20-398_M-20-398
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-398_M-20-398

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Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-398_M-20-398
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-398_M-20-398
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-398_M-20-398
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_20-398_M-20-398

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-400_M-20-400
Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-400_M-20-400
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-400_M-20-400
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_20-400_M-20-400
Brian	Gardow	bgardow@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-400_M-20-400
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-400_M-20-400
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_20-400_M-20-400
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-400_M-20-400
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-400_M-20-400
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-400_M-20-400