

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

Nancy Lange	Chair
Dan Lipschultz	Commissioner
Matt Schuerger	Commissioner
Katie Sieben	Commissioner
John Tuma	Commissioner

September 15, 2017

**In the Matter of the Petition of Northern States
Power Company, dba Xcel Energy, for Approval of
a Customer Access Joint Pilot Program**

Docket No. E-002/M-17-527

**INITIAL COMMENTS BY FRESH ENERGY IN RESPONSE TO THE COMMISSION'S
JULY 10, 2017 NOTICE OF COMMENT PERIOD**

Fresh Energy respectfully submits these initial comments in response to the Commission's July 10, 2017 Notice of Comment period regarding Xcel Energy's ("Xcel" or "the Company") proposed Customer Access Joint Pilot Program, also known as "Rehabilitation and Efficiency: Neighborhood Energy Works" or "RENEWs." These comments pertain to the community solar garden (CSG) component of Xcel's proposed pilot program; Xcel expects to file the energy efficiency component as an update to its Conservation Improvement Program (CIP) Triennial plan at a later date.

Fresh Energy appreciates Xcel's effort developing this proposal to improve access for low-income customers to community solar. In these comments, we recommend that Xcel commit to developing a detailed plan to scale the RENEWs model, suggest additional reporting items, and request further clarification on Xcel's Petition. We look forward to working with Xcel as its proposed pilot program moves forward in order to identify strategies to scale the pilot program and enhance access to community solar more broadly.

I. COMMENTS IN RESPONSE TO COMMISSION QUESTIONS

A. Is Xcel's proposal for a low-income pilot in the public interest?

Broadly, yes. Fresh Energy supports Xcel's proposal as an innovative model that will combine energy efficiency upgrades with community solar garden subscriptions. Xcel's June 30 filing identifies several barriers, many of which were raised in the proceedings in Docket No. E-002/M-13-867 on this topic,¹ and sets forth ways in which the pilot seeks to overcome those barriers. Fresh Energy also commends Xcel's partners in developing this pilot program, Energy CENTS Coalition, Dayton's Bluff Neighborhood Housing Association, Center for Energy and Environment, and THOR Construction, for their commitment to serving low-income households in the Railroad Island community through this project.

Fresh Energy supports several specific aspects of Xcel's proposed pilot program, as they are consistent with the identified barriers and recommendations that we provided in Docket No. E-002/M-13-867.² In particular, the Company has committed to providing the RENEWs project with no credit check, upfront costs, ongoing fees, or hidden charges, and will offer its customers subscription terms with no termination penalties.³ Further, Xcel has proposed targeted education and outreach, including in-home subscription opportunities, ongoing customer support, and translated informational materials.⁴

While Fresh Energy is supportive of Xcel's proposed pilot program, it is our view that a CSG project or program that is most consistent with the public interest is one that seeks to remove barriers to access for low-income customers, but is also scalable. On one hand, "scalable" can—and should—refer to larger CSG facilities, which would allow the Company to leverage economies of scale to serve more customers and lower costs. But "scalable" should also refer to a commitment to further development of this concept in a greater number of communities.

¹ *See, e.g.*, Initial Comments of Joint Commenters, April 1, 2016, Docket No. E-002-M13-867. Joint Commenters consisted of Fresh Energy, the City of Minneapolis, the Energy Transition Lab, Cooperative Energy Futures, GRID Alternatives, Interstate Renewable Energy Council, Inc., Minnesota Community Action Partnership, Minnesota Interfaith Power and Light, Minnesota Solar Connection, and Minnesota Solar Energy Industry Association. Joint Commenters' initial comments discussed several barriers that low-income customers face in subscribing to community solar gardens, including low or no credit score, perceived risk of default or turnover, and higher transaction costs.

² Initial Comments of Joint Commenters, April 1, 2016, Docket No. E-002/M-13-867, at 2-3.

³ Xcel Petition at 6.

⁴ *Id.*

Fresh Energy believes that Xcel, as a public utility, has a strong interest in ensuring equitable access across its service territory, and we would like to see Xcel's efforts expanded by the development of larger projects in more communities. Xcel's Petition does not demonstrate how the Company intends to scale the RENEWs model.

Fresh Energy has identified several specific areas in the Twin Cities metro area (all within Xcel Energy's service territory) that would also benefit from a RENEWs pilot. These areas each share similar characteristics to the Railroad Island neighborhood, such as median household income, number of renter-occupied housing units, and age of housing stock.⁵

1. Phillips



The Phillips community of Minneapolis has a population of about 20,315 residents.⁶ According to 2011-2015 American Community Survey (ACS) estimates, it has a median household income of approximately \$26,878.⁷ 78.2% of the occupied housing units in the Phillips community are renter-occupied, and an estimated 19.1% of all housing units were built in or before 1969.⁸

⁵ Fresh Energy gathered many of these data using the most recent data available from the U.S. Census and American Community Survey. Because most data are provided by census tract, these figures are not definitively precise, but are approximate for each neighborhood. All maps are courtesy of Google Maps.

⁶ U.S. Census Bureau (2010). *Interactive Population Map*. Retrieved from <https://www.census.gov/2010census/popmap/>

⁷ Minnesota Compass, *Phillips Community*. Retrieved from <http://www.mncompass.org/profiles/communities/minneapolis/phillips>

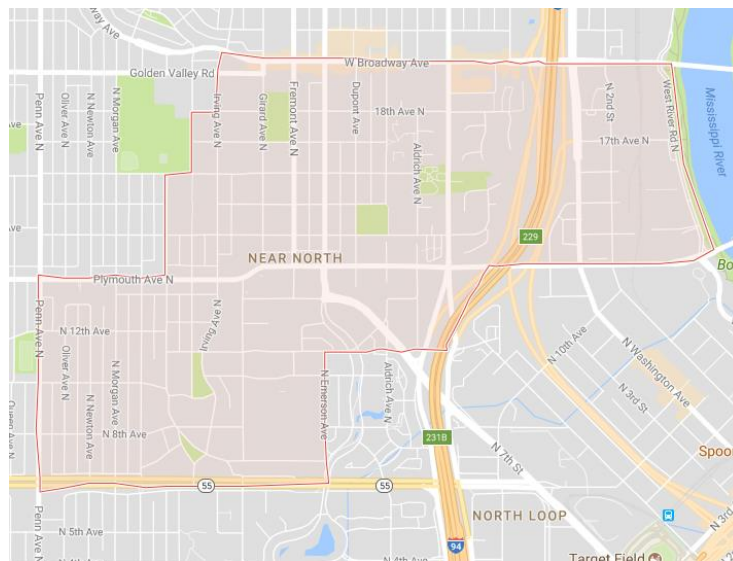
⁸ *Id.*

2. Frogtown/Thomas-Dale



The Frogtown/Thomas-Dale neighborhood of Saint Paul has a population of about 15,183 residents.⁹ According to 2011-2015 ACS estimates, it has a median household income of approximately \$35,126.¹⁰ 62.5% of the occupied housing units in the Frogtown/Thomas-Dale neighborhood are renter-occupied, and an estimated 24.5% of all housing units were built in or before 1969.¹¹

3. Near North Minneapolis



⁹ U.S. Census Bureau (2010). *Interactive Population Map*. Retrieved from <https://www.census.gov/2010census/popmap/>

¹⁰ Minnesota Compass, *Frogtown/Thomas-Dale Neighborhood*. Retrieved from <http://www.mncompass.org/profiles/neighborhoods/st-paul/frogtown-thomas-dale>

¹¹ *Id.*

The Near North neighborhood of Minneapolis has a population of about 7,012 residents.¹² According to 2011-2015 ACS estimates, it has a median household income of \$28,629.¹³ 69.3% of the occupied housing units in the Near North neighborhood are renter-occupied, and an estimated 18.2% of all housing units were built in or before 1969.¹⁴

A list of additional neighborhoods in the Twin Cities metro area that would benefit from a RENEWs project is attached to these comments as Attachment A.

Fresh Energy notes that multifamily buildings (residential buildings of five units or more) in particular could benefit significantly from targeted outreach through Xcel's proposed pilot. First, Xcel and its project partners can reach residents of one multifamily building more efficiently than they might reach the same number of residents in strictly single-family homes. In addition, multifamily buildings are commonly cited as prime candidates for community solar because residents of multifamily housing do not own their building (as opposed to single-family and townhome residents, who might own their home), and thus lack the ability to build a rooftop solar facility.¹⁵ As discussed in Section I.G below, Fresh Energy recommends that Xcel track customer participation by type of housing stock to identify which properties are best served through the proposed pilot.

Finally, it is in the public interest to ensure that this RENEWs model does not preclude further development for third-party owned CSGs. Fresh Energy recognizes the Commission's conclusion that "an Xcel-owned garden stands the best chance of extending the benefits of community solar to low-income customers,"¹⁶ but stakeholders in Minnesota and across the country continue to explore additional mechanisms to improve access for low-income

¹² Minnesota Compass, *Near-North Neighborhood*. Retrieved from <http://www.mncompass.org/profiles/neighborhoods/minneapolis/near-north>

¹³ *Id.*

¹⁴ *Id.*

¹⁵ See, e.g., Bentham Paulos, PaulosAnalysis, *Bringing the Benefits of Solar Energy to Low-Income Consumers*, May 2017. <http://www.cesa.org/assets/2017-Files/Bringing-the-Benefits-of-Solar-to-Low-Income-Consumers.pdf>

¹⁶ Order Approving Value-of-Solar Rate for Xcel's Solar-Garden Program, Clarifying Program Parameters, and Requiring Further Filings [hereinafter "Sept. 6, 2016 Order"], Docket No. E-022/M-13-867, at 19 (Sept. 6, 2016).

customers. Third-party developers in Minnesota are already working on CSG projects that seek to serve low-income subscribers.¹⁷ We encourage the Commission to continue to evaluate the potential for low-income access throughout community solar programs in Minnesota.

B. Is the proposal consistent with Minn. Stat. § 216B.1641, the Commission's September 6, 2016 Order (in Docket No. E-002/M-13-867), and other relevant law?

Xcel's proposal appears to be generally consistent with Minn. Stat. § 216B.1641. However, there are several aspects of Xcel's proposed pilot program that are either unclear or should be modified to better align with Minn. Stat. § 216B.1641.

First, Fresh Energy applauds Xcel's commitment to eliminating long-term contracts and onerous termination penalties for CSG subscribers in the Company's proposed pilot program, and we are pleased to see the Company's discussion of a subscriber waitlist in the event of high demand for the program. However, we are concerned about the lack of access to community solar that subscribers on the RENEWs waitlist might face. For example, a customer could enroll for a CSG subscription during the first year of the Company's RENEWs model, reach the end of his or her subscription term after five years, and thereafter remain on the randomized waitlist without receiving an opportunity to re-enroll. Instead, Fresh Energy suggests that, in addition to maintaining a randomized waitlist, the Company and its project partners should also assist customers who have reached the end of the five-year subscription term, as well as new applicants who are placed on the waitlist, to learn about other CSG offerings that might be available to them. Xcel offers numerous resources on its website¹⁸ which could be readily shared with RENEWs customers. This approach will ensure that former and prospective RENEWs customers have continued information on potential avenues to access community solar.

¹⁷ Frank Jossi, *Minnesota community solar projects aimed at low-income subscribers*, Midwest Energy News (July 6, 2017), <http://midwestenergynews.com/2017/07/06/minnesota-community-solar-projects-aimed-at-low-income-subscribers/>; Matthew Liedke, *Leech Lake tribe unveils new solar panel arrays to benefit low-income communities*, Duluth News Tribune (Aug. 14, 2017), <http://www.duluthnewstribune.com/4312334-leech-lake-tribe-unveils-new-solar-panel-arrays-benefit-low-income-communities>

¹⁸ Xcel Solar*Rewards Community website, https://www.xcelenergy.com/programs_and_rebates/residential_programs_and_rebates/renewable_energy_options_residential/solar/available_solar_options/community-based_solar

Xcel's proposed pilot program appears to be consistent with the directive of the Commission's September 6, 2016 Order "to develop a community solar garden proposal or proposals specifically for low-income customers, applying LIHEAP [Low-Income Home Energy Assistance Program] eligibility standards."¹⁹ However, Fresh Energy remains concerned that Xcel's June 30, 2017 filing does not demonstrate how the Company intends to continue to serve low-income customers through its CSG program beyond the scope of this one proposed pilot in the Railroad Island neighborhood.

From the Commission's Order and discussion at hearing on this topic in Docket No. E-002/M-13-867, it is clear that the continued objective is to "enhance access"²⁰ to community solar gardens for low-income customers. If the Commission decides to approve Xcel's proposed pilot program, Fresh Energy urges the Commission to require Xcel to file a detailed scaling plan using the RENEWs model within six months of an Order approving the pilot. We note that the numerous extensions already granted in this docket, as well as the process of reviewing the Company's updated Conservation Improvement Program (CIP) filing, and the solar facility construction timeline, could delay the proposed pilot's start date beyond Xcel's anticipated target of first quarter 2018.²¹ Given this extended timeframe, it is impracticable to wait to propose additional iterations of the RENEWs pilot until the initial Railroad Island project completes a full project year or publishes its final report. As discussed above, Fresh Energy has already identified three specific neighborhoods that would most benefit from a RENEWs project in the community, and nine additional communities that bear consideration.

Fresh Energy recognizes that the RENEWs model was made possible in Railroad Island through unique partnerships, available land to build a CSG facility, and additional resources to ensure a successful pilot project. By developing a detailed scaling plan now, Xcel can identify additional partners and resources in other areas within its service territory so that the RENEWs model can successfully expand to more low-income customers. Fresh Energy would

¹⁹ Sept. 6, 2016 Order at 20.

²⁰ *Id.*

²¹ Xcel Petition at 19.

be happy to work with Xcel and other interested parties to develop a detailed plan for scaling the RENEWs model.

C. Does Xcel’s proposal to work with non-Xcel project partners (Energy CENTS Coalition, Dayton’s Bluff Neighborhood Housing Association, Center for Energy and Environment and THOR Construction) raise any issues for Commission consideration?

Xcel’s proposed project partnerships do not raise significant concerns at this time. As Xcel notes in its filing, the proposed partners bring diverse skills, community relationships, and project expertise, and Fresh Energy commends Xcel for this unique partnership. As discussed in Section I.G below, Fresh Energy recommends that Xcel’s Annual Report include detailed information regarding the tasks carried out by each organization throughout the duration of the pilot program, the period of time over which tasks occurred, and the specific actions involved. Detailed reporting of the actions carried out by each organization involved in the Railroad Island pilot will help inform this project and future iterations of the model.

D. Minn. Stat. § 216B.1641, (e)(3) requires that any CSG plan approved by the Commission “not apply different requirements to utility and nonutility community solar garden facilities.” In addressing this statutory provision, Xcel was guided by three key principles of non-discrimination (described on pages 17-18 in the Petition). However, are there other issues of discrimination concerning non-utility developers/operators that the Commission should consider?

Fresh Energy commends Xcel for its use of three key principles of non-discrimination. These principles are not only critical for the development of a successful utility pilot to serve low-income customers, but also to ensure that third-party developers still have access to serve this hard-to-reach market. The Commission has previously acknowledged the importance of non-discrimination in Xcel’s community solar program.²² Fresh Energy requests that the

²² Order Rejecting Xcel’s Solar-Garden Tariff Filing and Requiring the Company to File a Revised Solar-Garden Plan, Docket No. E-002/M-13-867, at 27 (April 7, 2014) (“Xcel shall submit a filing for Commission approval of any proposal to offer utility-owned solar gardens. The filing shall include a

Commission continue to consider Xcel's stated non-discrimination principles, in addition to any principles identified by other parties, going forward.

The non-discrimination principles discussed by the Company are likely to become increasingly sensitive as the program grows. For example, Xcel explains that its proposal "ensures there is no unfair reliance on grid or distribution system information because it was introduced to us months ago by a party with no specialized knowledge of the Company's grid or distribution system assets."²³ It is unclear, however, how this explanation would align with a Company-led effort to scale the program. If Xcel intends to scale the RENEWs model beyond the Railroad Island project, it follows that the Company's key principles of non-discrimination will need to stand on their own, without the presumption that future projects would also occur based on proposals from other parties without knowledge of the Company's assets.

E. To implement the pilot program, Xcel is seeking approval of new tariff sheets (included as Attachment C to the Petition). Please comment on the proposed tariff sheets.

Xcel's tariff sheets include a proposed "Net Bill Credit,"²⁴ which the Company explains is intended "to easily communicate the value to potential subscribers in the form of a dollar per kWh expression."²⁵ Fresh Energy appreciates Xcel's effort to maintain simplicity on the customer's bill; however, there is a need to balance simplicity with fairness and transparency. Separating the CSG bill credit and the CSG costs on a customer's bill would allow the customer to evaluate how the price structure compares to nonutility offerings, and would be consistent with Minn. Stat. § 216B.1641, (e)(3) and the Company's stated non-discrimination principles. Fresh Energy recommends that the Commission require Xcel to separate the "Net Bill Credit" components on the customer bill, and modify its tariff sheets accordingly.

detailed explanation of all processes and procedures to ensure that solar-garden operators are treated on a nondiscriminatory basis with Xcel-owned solar gardens.")

²³ Xcel Petition at 17.

²⁴ Xcel Petition, Attachment C, Section No. 9, Original Sheet No. 100.

²⁵ Xcel Petition at 11.

F. Please comment on the guiding principles, best practices and recommendations for low-income program design filed by ILSR on March 1, 2017. How do they relate to Xcel’s low-income pilot proposal?

The Institute for Local Self-Reliance (ILSR) submitted comments on March 1, 2017 in response to the Commission’s September 6, 2016 Order, which invited “proposals by other parties to enhance access to community solar gardens for low-income customers.”²⁶ ILSR’s comments reflect several principles set forth in the Joint Commenters’ comments, as well other parties’ comments, in Docket No. E-002/M-13-867.

The principles and best practices raised in ILSR’s comments provide some points by which the success of the RENEWs model should be evaluated, namely:

- *Participation*

ILSR states that “everyone should be able to participate in community solar, from education and development to subscription and ownership.”²⁷ Joint Commenters filed recommendations in Docket No. E-002/M-13-867 with the aim of enhancing access to community solar among low-income households, and the Commission has also recognized this as a priority. Fresh Energy believes that the principle of “participation” should guide further development of the RENEWs model and access to community solar broadly.

- *Integration*

ILSR states that “community solar should integrate with existing low-income energy assistance, energy efficiency, and weatherization programs.”²⁸ Fresh Energy has no comment on program integration at this time, but notes that Xcel’s proposed pilot program will involve LIHEAP-eligible customers and leverage Xcel’s energy efficiency offerings. Fresh Energy recommends that Xcel work with third-party developers moving forward to share its learnings with respect to verifying customer eligibility, and explore the feasibility of making its on-bill interface available to third-party developers.

²⁶ Sept. 6, 2016 Order at 20.

²⁷ Comments of ILSR, March 1, 2017, Docket No. E-002/M-13-867 at 2.

²⁸ *Id.*

We recommend that the Commission consider ILSR’s comments, as well as the previous comments in Docket No. E-002/M-13-867, to guide the development of Xcel’s proposed pilot program and continue to ensure access to community solar programs for low-income households throughout Minnesota.

G. Xcel proposed annual reporting for the pilot. Should any other information, in addition to that proposed, be included in the Company’s annual report to the Commission?

Fresh Energy supports the proposed reporting criteria set forth by Xcel in its June 30 filing.²⁹ Further, Fresh Energy supports the Company’s proposal to file an annual report “separately from its garden operator annual reporting obligations,”³⁰ to better track the progress of the proposed pilot program. In addition to the information that Xcel proposed including in its annual report, Fresh Energy recommends that the Commission require Xcel to include the following:

- *Actual participation reported within Table 3 from Xcel’s June 30 filing*

Table 3. Estimated Pilot Participation

	Year 1	Year 2	Year 3	Total
Low Income Home Energy Squad	40	60	85	175
Home Energy Savings	25	65	139	229
Multi-Family Energy Savings Program (building/units)	2/56	2/56	3/64	7/176
Solar*Rewards Community Subscriptions	120	20*	20*	160

*We anticipate enrolling additional customers in Years 2 and 3 due to attrition.

To better track the actual performance of Xcel’s RENEWs pilot against Xcel’s estimated participation, Fresh Energy recommends that Xcel use the same Table 3 included in its June 30, 2017 filing (above) to report year-by-year performance in the Company’s annual reports.

²⁹ Xcel Petition at 16-17.

³⁰ Xcel Petition at 9.

- Project implementation actions, sorted by project partner*

Fresh Energy recommends that Xcel's annual report include information on the specific actions taken to implement the project, organized by project partner. This detailed reporting will allow interested stakeholders locally and nationwide to better understand the project structure as it progresses, and identify opportunities to improve the project structure in future iterations. This reporting would also the Company to identify best practices for utility/non-utility partnerships.
- Program costs (including specific CSG costs, where possible) and any bill credit adjustments*

Fresh Energy supports Xcel's proposal to track the cost of delivering the proposed pilot offering. We recommend that Xcel's annual report separate the CSG-related costs to the extent possible, as well as any adjustments made within the Net Bill Credit. Providing this information will allow the Commission and interested parties to better understand the full value of the program.
- Customer interest/disinterest*

Fresh Energy supports Xcel's proposal to include rate of subscription uptake in its annual report.³¹ In addition, we propose that the Company also include information regarding any lack of customer interest. Although we expect Xcel's proposed pilot program to be highly desirable among eligible customers, this reporting will allow the Company to identify possible improvements to the program if subscription uptake is lower than anticipated. Further, tracking and reporting this information would provide a better sense of the actual demand for CSGs among low-income households. Joint Commenters discussed the value of tracking actual low-income customer interest and participation in Docket No. E-002/M-13-867.³²
- Number of housing units served, sorted by type of housing stock*

Fresh Energy recommends that Xcel include information on the types of housing stock served through the proposed pilot program. As discussed in Section I.A above, multifamily buildings present unique opportunities to efficiently conduct outreach and program delivery. Detailed reporting of the number of housing units served, organized by housing stock, will allow Xcel and other interested parties to identify any potential

³¹ Xcel Petition at 16.

³² Initial Comments of Joint Commenters, April 1, 2016, Docket No. E-002/M-13-867 at 1.

barriers that might arise only in certain types of housing, and develop strategies to overcome those barriers.

H. Should the Commission take up the issue of cost recovery separately at a later time?

Fresh Energy has no comment on the issue of cost recovery at this time. Fresh Energy supports clear, detailed tracking and reporting of program costs, as Xcel has proposed.³³

I. What other parts of Xcel’s proposal require additional clarification?

1) Xcel’s characterization of community solar

Although Fresh Energy is supportive of Xcel’s proposed pilot program, we are concerned with statements contained in Section V of the Company’s Petition.³⁴ In this “Background” section, Xcel makes several assertions with which Fresh Energy cannot agree. While Fresh Energy recognizes the concerns raised by Energy CENTS Coalition in Docket No. E-002/M-13-867,³⁵ the statements made by Xcel in the “Background” section of its Petition are misguided.

Xcel’s Petition states that “...community solar is not intended to be a discount service. As the Company has highlighted in this record, participants in community solar elsewhere in Minnesota and across the country access similar programs at a premium price compared to retail service.”³⁶ We disagree—bill savings is an especially important principle for this low-income residential customer segment. In fact, similar programs across the country do in fact provide bill savings for low-income customers, including the recently approved Consolidated Edison shared solar pilot program for low-income customers. In its Order approving the pilot program, the New York Public Service Commission stated:

...the primary focus of the Shared Solar Pilot is to provide opportunities for low income customers to participate in clean energy offerings and obtain bill

³³ Xcel Petition at 10, 17.

³⁴ Xcel Petition at 4, citing Xcel Customer Access Joint Pilot Concept, March 1, 2017, Docket No. E-002/M-13-867 at 3.

³⁵ Sept. 6, 2016 Order at 19-20.

³⁶ Xcel Petition at 4.

savings...The Shared Solar Pilot should be designed to provide meaningful bill savings to participating low income customers. The Commission finds that the Company's estimated average \$5 bill credit may not be sufficient to encourage meaningful low income customer participation in the Shared Solar Pilot. The Company should examine strategies to increase the level of savings when designing the solar credit...³⁷

Fresh Energy notes that Xcel has proposed a \$2.16 monthly credit per customer.³⁸ This number has not been fully explained on the record. We recommend that the Commission require Xcel to provide greater detail regarding this initial calculation of the RENEWs bill credit to allow parties and other stakeholders to track bill savings, and the possibility to improve bill savings for low-income customers, on an ongoing basis.

Xcel goes on to state that "...the structure of Solar*Rewards Community is a relatively poor fit for efficiently reducing customer bills. This is because all customers fund the bill credit for participating subscribers — including Residential class customers with low incomes. All customers pay more for the participation of a few, and this cost burden grows as the program grows." As Fresh Energy has previously argued, however, the Value of Solar rate is designed to minimize concerns about unfair impacts to nonparticipants. The Commission agreed with this argument in its Order approving the Value of Solar rate.³⁹

Lastly, Xcel states that "the Commission's requirement that the Company participate directly in the program" arose because third-party developers have "fallen short" of an expectation to "include those customers historically foreclosed from rooftop solar."⁴⁰ Fresh Energy applauds the efforts made by the Commission and Xcel to enhance access for low-income customers through this utility pilot, but we do not agree with Xcel's assertion that third-party developers have failed this segment of residential customers.

³⁷ New York Public Service Commission, Order Approving Shared Solar Program with Modification, Case No. 16-E-0622 at 20 (Aug. 2, 2017).

³⁸ Xcel Petition at 11.

³⁹ Sept 6, 2016 Order at 14 ("Because the value-of-solar rate compensates subscribers for the value—and only the value—that their generation brings to Xcel's system, it will address concerns that nonparticipating ratepayers are subsidizing the program.").

⁴⁰ Xcel Petition at 4.

Joint Commenters' comments in Docket No. E-0.02/M-13-867 discussed the various barriers facing these customers in great detail.⁴¹ Fresh Energy notes that Joint Commenters' comments also included a number of recommendations that involved both program design and market incentives,⁴² which the Commission could consider if deemed a priority going forward.

2) Process for determining LIHEAP eligibility

Fresh Energy believes that further clarification on the record is needed regarding Xcel's process for verifying customer eligibility for the proposed pilot program. The LIHEAP application form, attached as Attachment B, is a relatively onerous document. Will each RENEWs participant be required to complete the LIHEAP application form, or will income that is aligned with specific income levels suffice (and if so, how will income be verified)? How will customer eligibility be re-verified upon re-enrollment?

3) Sizing for load after energy efficiency improvements

While the proceeding in this docket pertains to the CSG component of Xcel's proposed pilot program, Fresh Energy notes that the project structure begins with an energy efficiency service delivery phase. The energy efficiency measures installed will affect each customer's energy usage, and thus impact the appropriate CSG subscription size. Fresh Energy requests that Xcel clarify the assumptions made in its filing regarding the energy savings achieved by energy efficiency measures in order to appropriately size each customer's CSG subscription to achieve deeper bill savings for low-income customers.

II. RECOMMENDATIONS

Fresh Energy recommends that the Commission:

1. Require Xcel to file a scaling plan for its RENEWs model within six months of an Order approving this pilot project, including consideration of the neighborhoods that Fresh Energy has included in these comments;
2. Direct Xcel and its project partners to assist customers who have reached the end of their RENEWs subscription term in finding other CSG offerings that might be available to them;

⁴¹ Initial Comments of Joint Commenters, Docket No. E-022/M-13-867, at 1-3.

⁴² Initial Comments of Joint Commenters, Docket No. E-022/M-13-867, at 5-13.

3. Direct Xcel to include additional items in its Annual Report, including:
 - Actual participation numbers by year, reported in-line with the Company's estimated numbers from its June 30 filing,
 - Specific actions undertaken by organizations who are partnering with Xcel to deliver the RENEWs project,
 - Program costs (including specific CSG program costs), and any bill credit adjustments,
 - Customer interest and disinterest, and
 - Number of housing units served, sorted by housing stock;
4. Direct Xcel to separate the Net Bill Credit components on the customer's bill, and modify its tariff sheets accordingly;
5. Require Xcel to file detailed information regarding the initial RENEWs bill credit calculation; and
6. Direct Xcel to clarify the LIHEAP eligibility verification process and energy efficiency savings assumptions, if not addressed in reply.

/s/ Ben Passer

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ATTACHMENT A

List of Neighborhoods/Communities Warranting Consideration in Future Iterations of the RENEWs Model⁴³

1) Phillips



The Phillips community of Minneapolis has a population of about 20,315 residents.⁴⁴ According to 2011-2015 American Community Survey (ACS) estimates, it has a median household income of approximately \$26,878.⁴⁵ 78.2% of the occupied housing units in the Phillips community are renter-occupied, and an estimated 19.1% of all housing units were built in or before 1969.⁴⁶

⁴³ All maps are courtesy of Google Maps.

⁴⁴ U.S. Census Bureau (2010). *Interactive Population Map*. Retrieved from <https://www.census.gov/2010census/popmap/>

⁴⁵ Minnesota Compass, *Phillips Community*. Retrieved from <http://www.mncompass.org/profiles/communities/minneapolis/phillips>

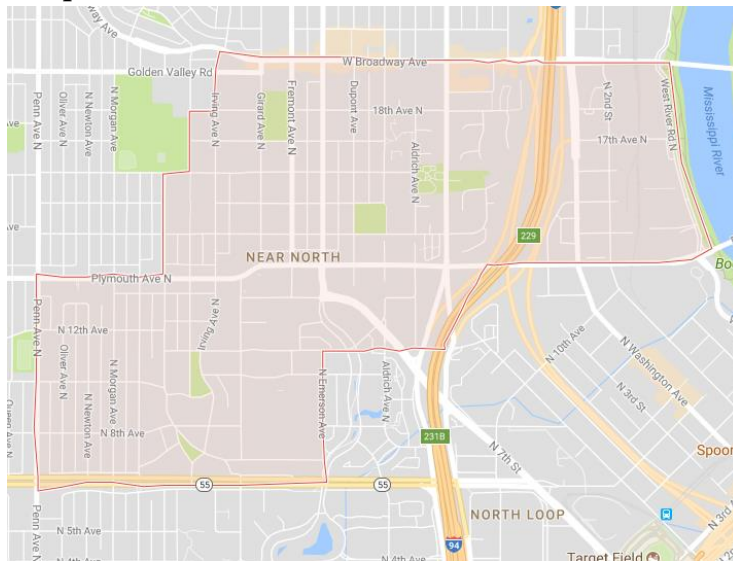
⁴⁶ *Id.*

2) Frogtown/Thomas-Dale



The Frogtown/Thomas-Dale neighborhood of Saint Paul has a population of about 15,183 residents.⁴⁷ According to 2011-2015 ACS estimates, it has a median household income of approximately \$35,126.⁴⁸ 62.5% of the occupied housing units in the Frogtown/Thomas-Dale neighborhood are renter-occupied, and an estimated 24.5% of all housing units were built in or before 1969.⁴⁹

3) Near North Minneapolis



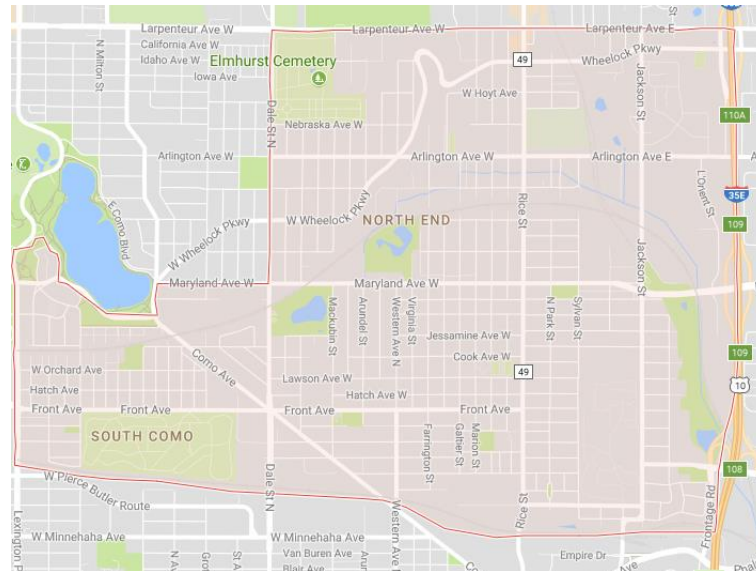
⁴⁷ U.S. Census Bureau (2010). *Interactive Population Map*. Retrieved from <https://www.census.gov/2010census/popmap/>

⁴⁸ Minnesota Compass, *Frogtown/Thomas-Dale Neighborhood*. Retrieved from <http://www.mncompass.org/profiles/neighborhoods/st-paul/frogtown-thomas-dale>

⁴⁹ *Id.*

The Near North neighborhood of Minneapolis has a population of about 7,012 residents.⁵⁰ According to 2011-2015 ACS estimates, it has a median household income of \$28,629.⁵¹ 69.3% of the occupied housing units in the Near North neighborhood are renter-occupied, and an estimated 18.2% of all housing units were built in or before 1969.⁵²

4) North End



The North End neighborhood of Saint Paul has a population of about 22,848 residents.⁵³ According to 2011-2015 ACS estimates, it has a median household income of \$32,339.⁵⁴ 61.0% of the occupied housing units in the North End neighborhood are renter-occupied, and an estimated 40.5% of all housing units were built in or before 1969.⁵⁵

⁵⁰ Minnesota Compass, *Near-North Neighborhood*. Retrieved from <http://www.mncompass.org/profiles/neighborhoods/minneapolis/near-north>

⁵¹ *Id.*

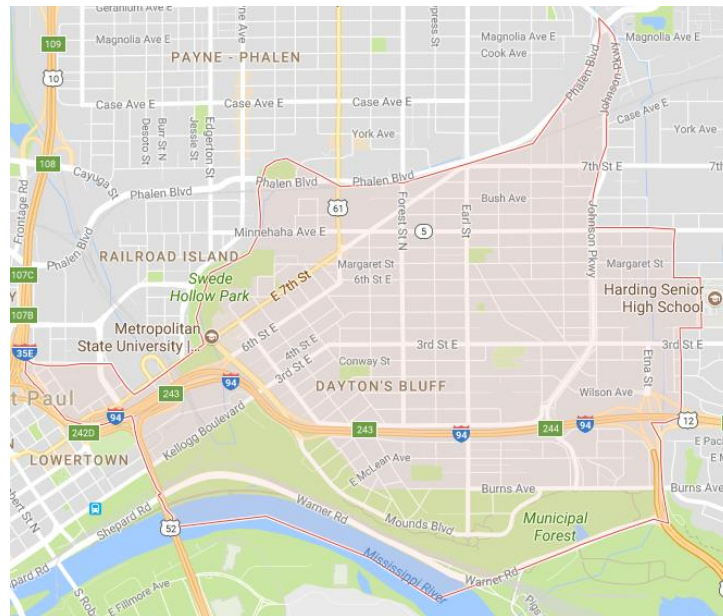
⁵² *Id.*

⁵³ Minnesota Compass, *North End Neighborhood*. Retrieved from <http://www.mncompass.org/profiles/neighborhoods/st-paul/north-end>

⁵⁴ *Id.*

⁵⁵ *Id.*

5) Dayton's Bluff



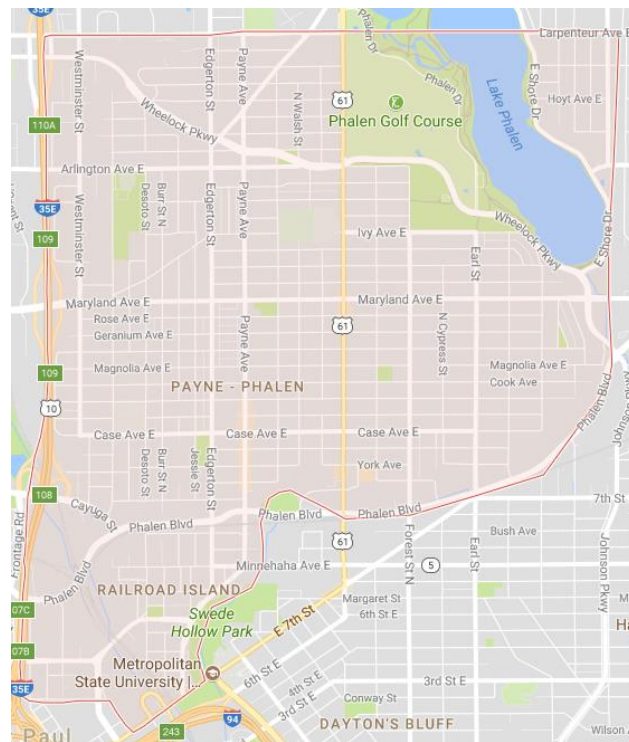
The Dayton's Bluff neighborhood of Saint Paul, which adjoins/overlaps with Railroad Island, has a population of about 18,013 residents.⁵⁶ According to 2011-2015 ACS estimates, it has a median household income of \$40,145.⁵⁷ 49.0% of the occupied housing units in the Dayton's Bluff neighborhood are renter-occupied, and an estimated 27.2% of all housing units were built in or before 1969.⁵⁸

⁵⁶ Minnesota Compass, *Dayton's Bluff Neighborhood*. Retrieved from <http://www.mncompass.org/profiles/neighborhoods/st-paul/daytons-bluff>

⁵⁷ *Id.*

⁵⁸ *Id.*

6) Payne-Phalen



The Payne-Phalen neighborhood of Saint Paul, which also adjoins/overlaps with Railroad Island, has a population of about 31,121 residents.⁵⁹ According to 2011-2015 ACS estimates, it has a median household income of \$43,229.⁶⁰ 49.6% of the occupied housing units in the Payne-Phalen neighborhood are renter-occupied, and an estimated 34.5% of all housing units were built in or before 1969.⁶¹

⁵⁹ Minnesota Compass, *Payne-Phalen Neighborhood*. Retrieved from <http://www.mncompass.org/profiles/neighborhoods/st-paul/payne-phalen>

⁶⁰ *Id.*

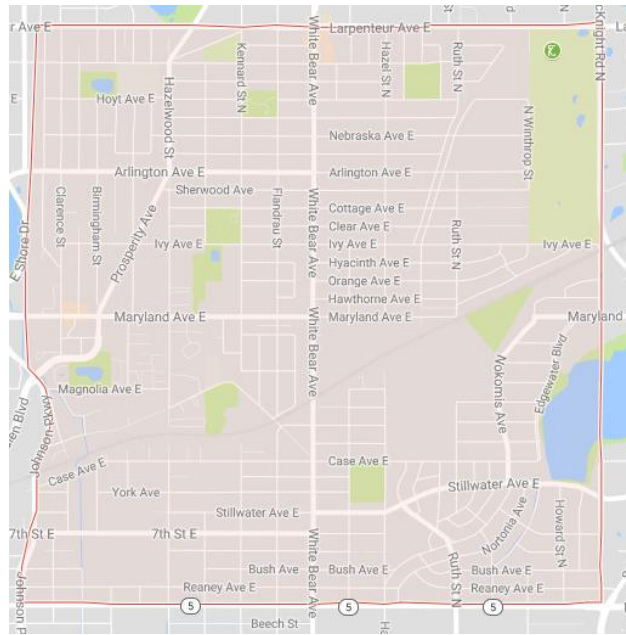
⁶¹ *Id.*

7) West Side



The West Side neighborhood of Saint Paul has a population of about 14,959 residents.⁶² According to 2011-2015 ACS estimates, it has a median household income of \$43,537.⁶³ 43.9% of the occupied housing units in the West Side neighborhood are renter-occupied, and an estimated 39.0% of all housing units were built in or before 1969.⁶⁴

8) Greater East Side



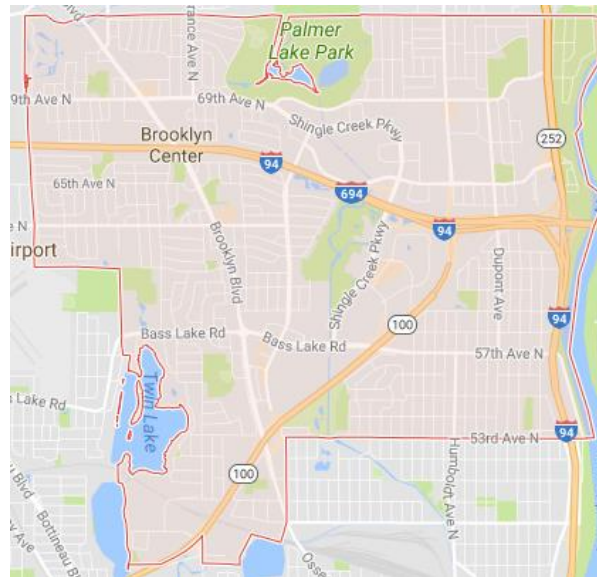
⁶² U.S. Census Bureau (2010). *Interactive Population Map*. Retrieved from <https://www.census.gov/2010census/popmap/>

⁶³ Minnesota Compass, *West Side Neighborhood*. Retrieved from <http://www.mncompass.org/profiles/neighborhoods/st-paul/west-side>

⁶⁴ *Id.*

The Greater East Side neighborhood of Saint Paul has a population of about 27,206 residents.⁶⁵ According to 2011-2015 ACS estimates, it has a median household income of \$43,630.⁶⁶ 43.4% of the occupied housing units in the Greater East Side neighborhood are renter-occupied, and an estimated 68.6% of all housing units were built in or before 1969.⁶⁷

9) Brooklyn Center



The city of Brooklyn Center has a population of about 30,684 residents.⁶⁸ According to 2011-2015 ACS estimates, it has a median household income of \$44,855.⁶⁹ 38.2% of the occupied housing units in Brooklyn Center are renter-occupied, and an estimated 65.5% of all housing units were built in or before 1969.⁷⁰

⁶⁵ U.S. Census Bureau (2010). *Interactive Population Map*. Retrieved from <https://www.census.gov/2010census/popmap/>

⁶⁶ Minnesota Compass, *Greater East Side Neighborhood*. Retrieved from <http://www.mncompass.org/profiles/neighborhoods/st-paul/greater-east-side>

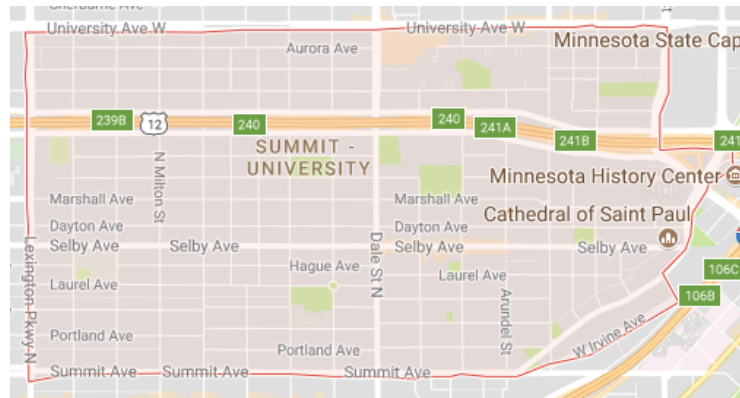
⁶⁷ *Id.*

⁶⁸ Minnesota Compass, *City of Brooklyn Center*. Retrieved from <http://www.mncompass.org/profiles/city/brooklyn-center>

⁶⁹ *Id.*

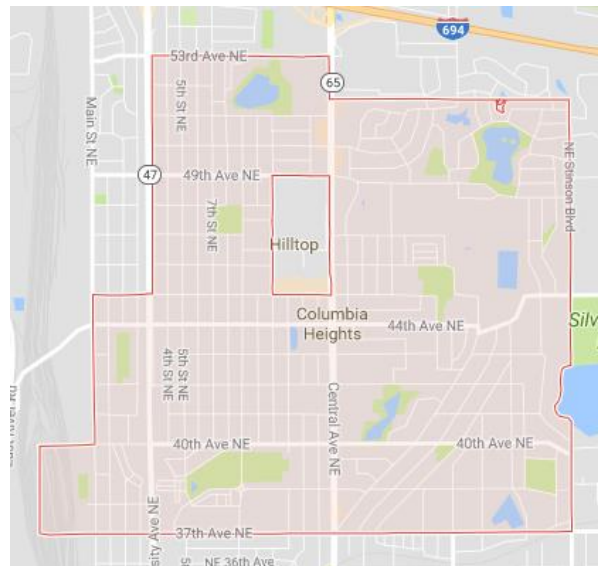
⁷⁰ *Id.*

10) Summit-University



The Summit-University neighborhood of Saint Paul has a population of about 18,296 residents.⁷¹ According to 2011-2015 ACS estimates, it has a median household income of \$47,306.⁷² 66.0% of the occupied housing units in the Summit-University neighborhood are renter-occupied, and an estimated 21.4% of all housing units were built in or before 1969.⁷³

11) Columbia Heights



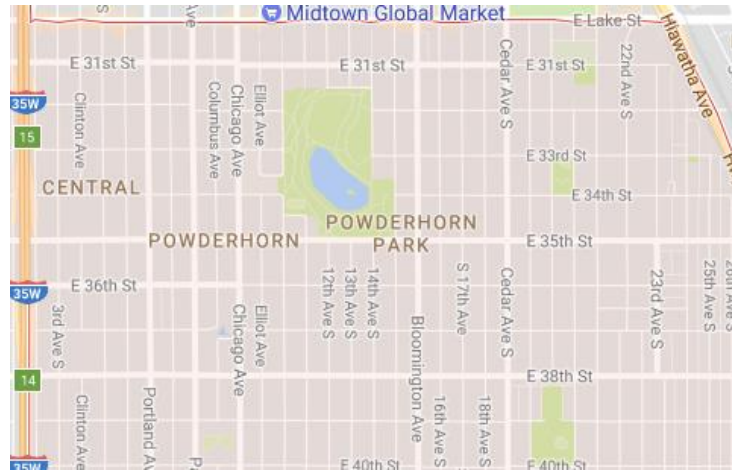
⁷¹ Minnesota Compass, *Summit-University Neighborhood*. Retrieved from <http://www.mncompass.org/profiles/neighborhoods/st-paul/summit-university>

⁷² *Id.*

⁷³ *Id.*

The city of Columbia Heights has a population of about 19,632 residents.⁷⁴ According to 2011-2015 ACS estimates, it has a median household income of \$47,717.⁷⁵ 35.4% of the occupied housing units in Columbia Heights are renter-occupied, and an estimated 61.2% of all housing units were built in or before 1969.⁷⁶

12) Powderhorn



The Powderhorn community of Minneapolis has a population of about 57,712 residents.⁷⁷ According to 2011-2015 ACS estimates, it has a median household income of \$45,768.⁷⁸ 59.5% of the occupied housing units in the Powderhorn community are renter-occupied, and an estimated 27.5% of all housing units were built in or before 1969.⁷⁹

⁷⁴ Minnesota Compass, *City of Columbia Heights*. Retrieved from <http://www.mncompass.org/profiles/city/columbia-heights>

⁷⁵ *Id.*

⁷⁶ *Id.*

⁷⁷ Minnesota Compass, *Powderhorn Community*. Retrieved from <http://www.mncompass.org/profiles/communities/minneapolis/powderhorn>

⁷⁸ *Id.*

⁷⁹ *Id.*

ATTACHMENT B

INSTRUCTIONS FOR COMPLETING 2016-2017 MINNESOTA ENERGY PROGRAMS APPLICATION

These instructions help you complete your **2016-2017 Minnesota Energy Programs Application**. The application is used to apply for the Energy Assistance Program (EAP), Weatherization Assistance Program (WAP) and the Conservation Improvement Program (CIP). The Minnesota Energy Programs Application is available in Spanish or in large print from your local EAP Service Provider or online at <http://mn.gov/commerce/consumers/consumer-assistance/energy-assistance/>

To apply for the Energy Programs, you must send to your local EAP Service Provider:

- The completed application with all questions answered and the last page signed and dated.
- A copy of proof of income received in the last 3 full calendar months for each household member.
- A copy of your last heating bill and your last electric bill.
- A copy of your last fuel receipt if you use delivered fuel for heating.

Failure to provide required documents may result in delay or denial of your application.

PART 1. Personal Information: Fill in your Social Security Number (SSN), name, current home address, phone number, and contact information. The primary household member must provide a verifiable SSN to process your application. Contact your local EAP Service Provider if no one in your household is able to provide an SSN. You may be able to provide an alternative legal document number.

Authorized Representative: This is someone you give permission, in writing, to act for you for these programs. If you want this person to receive all your EAP mail, write his/her address on the application.

PART 2. Household Information: Fill in all the information for everyone living in your home. ALL people living in the home are household members if they share the kitchen or other living areas in the home. Live-in care providers are not counted as household members if you have proof from a health care provider that daily medical care is required. The Social Security Number for other persons in the household is requested (optional). Non-custodial parents may include their minor children under age 18 as household members.**Sources of Income and Other Assistance:**

- Mark (x) all sources of income for all members of your household.
- Report all income and all money received by each household member in the last 3 full calendar months.
- Send proof of all gross income received by all people in your household in the last 3 full calendar months before the month you sign your application. Send copies, originals will not be returned.

Proof of Income by type:

- **Wages:** Check stubs or a written statement signed by your employer stating gross wages.
- **MFIP, DWP, GA:** Statement from the county showing monthly amount or bank statements.
- **Spousal Support or Alimony:** Checks, bank deposits, or a note signed by the payer stating the amount and dates of received payments or other proof of amount received.
- **Disability Payments, Veteran's Benefits, Workers' Compensation, Social Security, RSDI and SSI:** Award letters, bank statements showing direct deposits or a copy of the check(s).
- **Unemployment Compensation:** Unemployment weekly benefit printout from www.uimn.org. Click on "Log in to My Account" and log in, go to "View and Maintain My Account," then "Payment Information," and enter date range for the last 5 full calendar months.
- **Self Employed, Farm, and Rental Income:** The first 2 pages of your most recent IRS-1040 tax return. If you did not file taxes or you have been self-employed less than 2 years, call your local EAP Service Provider and ask for a *Self-Employment Form*. Enter the date your business started in the space provided on page two of the application.
- **Interest, Dividend:** Bank statements or your IRS-1099 or IRS-1040.
- **Retirement Income:** Benefit checks/stubs, bank statements or award letter.
- **Pensions and Annuities:** Benefit checks/stubs, bank statements or award letter.
- **Tribal Bonus, Judgments or Per Capita Payments:** Benefit checks/stubs, bank statements or award letter.
- **No Income:** If your household has no income and no one is self-employed, call your local EAP Service Provider for a *Verification of Income & Expenses* form.

****Please send a copy of your proof of income. Originals will not be returned****

PART 3. Housing Information: Check the type of housing you live in, how long you have lived there and your monthly payment. If you are a **renter**, tell us if you receive a housing subsidy, whether you pay heat or electricity and your landlord's name, phone number and address.

You are a **homeowner** if you own, are buying your home, have a home mortgage or contract for deed.

Homeowners: If you have a furnace heating problem, we may be able to provide repair services.

Self-employed: If your residence is used for work or you rent out space in your home, complete this section.

PART 4. Heating Sources: Put "1" by the heating fuel you use the most and "2" by all other heating fuels.

- If your home is heated with more than one type of heating fuel, mark all boxes that apply.
- **If you use electric heat as a heating source**, it must provide most or all the heat to one or more rooms (excluding bathrooms) or provide heat to the entire home. Electric is not a heat source if only used to run the furnace fan or the thermostat.
- Enter the name of the heating and electric company providing energy to your home.
- Include the name on the account and the account number.
- Wood, corn, pellet or other biofuel users: Show how much of your heat it provides. Do you cut or grow your own wood, corn, pellets or other biofuel? Enter the number of bedrooms in your home.

PART 5. Permissions and Signature: Read the permissions carefully. **An adult household member, 18 years of age and older or emancipated minor, must sign the application. Any other person signing the application must have a Power of Attorney (POA) to act on behalf of the household and must submit a copy along with the application. Return the application to your local EAP Service Provider. Your application must be received within 60 days of the date signed. It must be postmarked or received no later than May 31, 2017.**

- ANY missing information may delay decisions regarding your eligibility and benefit amount.
- Your local EAP Service Provider may be able to help you pay your past due energy bills and/or arrange a monthly payment plan with your heating and/or electric company.
- Your application will be processed as quickly as possible. You will receive a letter when your application is completed.

Important Notice:

The Energy Assistance Program may provide eligible households with energy crisis assistance. Write down the name and phone number of your local EAP Service Provider and call them if:

- Your energy services are or will be shut-off,
- You are unable to get a delivery of fuel, or
- You own your home and your furnace is not working.

Weatherization Assistance Program (WAP) Income Eligibility Guidelines

You may be eligible for the Weatherization Assistance Program (WAP) even if your household's income is higher than the EAP limits. WAP provides free home energy upgrades to income-eligible homeowners and renters to help save energy and make your home a healthy and safe place to live. For income eligibility please refer the Minnesota Weatherization Assistance Program at <https://mn.gov/commerce/consumers/consumer-assistance/weatherization> or call **1-800-657-3710**

Cold Weather Rule Protection: If you use natural gas or electricity to heat your home or you need electricity to operate your thermostat or furnace fan, you may be eligible for Cold Weather Rule protection.

- The Cold Weather Rule helps reconnect and protect your service between October 15 and April 15.
- **To get Cold Weather Rule protection, you MUST contact your energy companies and make and keep a payment plan. If you miss a payment, you lose your protection and you could lose your heat.**
- If you receive Energy Assistance, you pre-qualify for Cold Weather Rule protection. The Energy Assistance Program does not replace what you need to pay.
- Local EAP Service Provider staff can help you make a reasonable payment plan with your energy companies.

For office use only

HH: _____

Referral _____

Rep#: _____

Grant amount: _____

Please use black ink to complete your application

2016-2017 MINNESOTA ENERGY PROGRAMS APPLICATION



Before completing this application, carefully read the enclosed "Your Rights and Responsibilities" and Instructions.

Part 1. Personal Information - Verify all preprinted information is correct. Enter changes as needed.

Your Social Security Number	Disclosure of Social Security Number for the primary applicant is required. If you do not provide your verifiable social security number, your application cannot be processed. AUTHORITY: Section 205(c)(2)(C)(i) of the Social Security Act, 42 U.S.C. § 405(c)(2)(C)(i) USE: The State will use Social Security Numbers in the administration of the LIHEAP to verify information supplied on the application, to prevent, detect, and correct fraud, waste, and abuse, and for the purpose of responding to requests for information from agency programs funded by block grants to states for temporary assistance for families in need.
------------------------------------	---

Your Name: _____ MM - DD - YYYY

_____ - _____ - _____

First Name _____ M.I. _____ Last Name _____ Date of Birth _____

Current Home Address:

_____ MN _____

Street _____ Apt # _____ City _____ State _____ Zip Code _____

Mailing Address (if different from Home Address)

_____ MN _____

Street or POBox _____ Apt # _____ City _____ State _____ Zip Code _____

County: _____ **Township:** _____

Home Phone: (____) _____ **Other Phone (if different from Home Phone):** (____) _____

Primary Language spoken in home: _____ **E-Mail Address:** _____

Authorized Representative: If you complete this section, you give the "Authorized Representative" permission to act for you. First Name, _____ Last Name _____ Phone (____) _____

If you would like the **Authorized Representative** to get the mail on behalf of you, please fill in the address below:

_____ MN _____

Street or POBox _____ Apt # _____ City _____ State _____ Zip Code _____

YOU MUST SIGN AND DATE THIS APPLICATION AT THE BOTTOM OF THE LAST PAGE

Part 2. Household Information

LIST ALL HOUSEHOLD MEMBERS, STARTING WITH YOU:

First Name, M.I., & Last Name	Social Security Number	Date of Birth MM-DD-YYYY	Race	His-panic Y/N	Sex M/F	Dis-ability Y/ N	Years Of School	Veteran Y/N	Have Income Y/N
1. (self)	(required)	- -							
2.		- -							
3.		- -							
4.		- -							
5.		- -							
6.		- -							
7.		- -							
8.		- -							

Attach a separate sheet if necessary for any additional household members.

Race: A = Asian B = Black or African American I = American Indian or Alaska Native
 P = Native Hawaiian or Other Pacific Islander W = White M = Multi Race O = Other

Is anyone in your household currently an employee *or* board member of this energy assistance agency? Yes No

How many people in your household had income in the past 3 months? _____

How many members of your household do NOT have health insurance? _____

INCOME, BENEFITS AND OTHER ASSISTANCE (Check all that apply for your household and send proof of income)

<input type="checkbox"/> Wages <input type="checkbox"/> Self-Employment/Farm Income* Date Business started: _____ <input type="checkbox"/> Rental Income <input type="checkbox"/> Unemployment Compensation <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Interest or Dividend Income <input type="checkbox"/> Contract for Deed Interest <input type="checkbox"/> Veterans' Benefits <input type="checkbox"/> Social Security Retirement Benefits <input type="checkbox"/> Soc. Security Disability Income (SSDI)	<input type="checkbox"/> Supplemental Security Income (SSI) <input type="checkbox"/> Retirement Survivors Disability Insurance (RSDI) <input type="checkbox"/> Retirement Income <input type="checkbox"/> Pension/Annuity (including quarterly & annual) <input type="checkbox"/> Tribal Per Capita Payments <input type="checkbox"/> Tribal Judgments or Tribal Bonus <input type="checkbox"/> Diversionary Work (DWP) <input type="checkbox"/> Long/Short-term Disability <input type="checkbox"/> Minnesota Family Investment Program (MFIP) <input type="checkbox"/> General Assistance (GA) <input type="checkbox"/> Alimony or Spousal Support	<input type="checkbox"/> Other income not listed: _____ _____ No proof of income required for the following sources: <input type="checkbox"/> Child Support Monthly amount \$ _____ <input type="checkbox"/> Food Support <input type="checkbox"/> Earned Income Tax Credit <input type="checkbox"/> No Income (Please contact your local EAP agency)
--	--	--

Send proof of all gross income received by all people in your household in the **last 3 full calendar months**. Send copies, originals will not be returned. Wages for children in grades K-12 are not counted.

*If self-employed, send first 2 pages of your most recent IRS-1040 tax return. Contact your local EAP Service Provider if your business was started less than two years ago.

Your application will be delayed if you do not include proof of income.

You must sign and date the last page of the application. It must be postmarked or received on or before:

May 31, 2017

If you sign application in:	Send proof of gross income received in the months of:	For EAP, your household income cannot be more than these income guidelines for three months:	
		Household Size	Income
Aug 2016	May, June, July 2016		
Sept 2016	June, July, Aug 2016	1	\$6,135
Oct 2016	July, Aug, Sept 2016	2	\$8,023
Nov 2016	Aug, Sept, Oct 2016	3	\$9,910
Dec 2016	Sept, Oct, Nov 2016	4	\$11,798
Jan 2017	Oct, Nov, Dec 2016	5	\$13,686
Feb 2017	Nov, Dec 2016, Jan 2017	6	\$15,574
Mar 2017	Dec 2016, Jan, Feb 2017	7	\$15,928
Apr 2017	Jan, Feb, March, 2017	8	\$16,282
May 2017	Feb, March, April 2017	9	\$16,636

Part 3. Housing Information

<p>Type of Housing:</p> <input type="checkbox"/> House <input type="checkbox"/> Apartment/Condo <input type="checkbox"/> Townhouse <input type="checkbox"/> Mobile Home <input type="checkbox"/> Duplex <input type="checkbox"/> Triplex <input type="checkbox"/> Fourplex <input type="checkbox"/> Other _____	Do you pay for rent or mortgage? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes , amount (\$):_____ (required)
How long have you lived in your current home? _____Years _____Months	<p>Renters: Do you get a rent subsidy or do you live in subsidized housing? <input type="checkbox"/>Yes <input type="checkbox"/>No</p> Is heat included in your rent? <input type="checkbox"/> Yes <input type="checkbox"/> No Is electricity included in your rent? <input type="checkbox"/> Yes <input type="checkbox"/> No Landlord's Name: _____ Phone:(____) _____ Address: _____
	<p>Homeowners: Do you own or are you buying your home? <input type="checkbox"/>Yes <input type="checkbox"/>No</p> If your furnace/heating system is currently NOT working, check this box: <input type="checkbox"/> Contact your local EAP agency immediately if your furnace/heating system is not working.
	<p>Business Use of Home: If you are self-employed, is the business at your home? <input type="checkbox"/>Yes <input type="checkbox"/>No</p> If Yes , what kind of business and what work is done in your home or on your property? _____
	Do you rent out part of your home to anyone? <input type="checkbox"/> Yes <input type="checkbox"/> No

Part 4. Heat Sources (note: Electricity is only a heat source when used to provide heat to one or more rooms.)

Put "1" in the box by the **heating** fuel you use the most and "2" by other heating fuels you use to heat your home.

Oil <input style="width: 40px; height: 20px;" type="text"/>	Propane/LP <input style="width: 40px; height: 20px;" type="text"/>	Wood <input style="width: 40px; height: 20px;" type="text"/>	Pellets <input style="width: 40px; height: 20px;" type="text"/>	Municipal Steam <input style="width: 40px; height: 20px;" type="text"/>
Natural Gas <input style="width: 40px; height: 20px;" type="text"/>	Electricity <input style="width: 40px; height: 20px;" type="text"/>	Corn <input style="width: 40px; height: 20px;" type="text"/>	Other Biofuel <input style="width: 40px; height: 20px;" type="text"/>	St. Paul Dist. Heating <input style="width: 40px; height: 20px;" type="text"/>

What energy companies supply heat and electricity to your home?

	Heating No. 1	Heating No. 2	Electric
Company Name:			
Name on Account:			
Account number:			

SEND A COPY OF YOUR LAST HEAT AND ELECTRIC BILLS OR FUEL RECEIPT WITH THIS APPLICATION

Do you heat with wood, pellets, corn or other biofuel? Yes No If **Yes**, answer the next 3 questions

1. What percent of your heat does this supply? (use chart) (**Circle the percent used last year from wood, corn, pellets, other.**):
2. Do you cut your wood or grow fuel corn? Yes No
3. How many bedrooms are in your home? _____

10%	20%	30%	40%	50%	60%	70%	80%	90%	100%
Use sometimes			Half of the time			Almost Always		All	

If you are having an energy emergency right now, check type of emergency below and send a copy of the notice from your energy company showing the amount owed:

- Already disconnected. Company: _____ Disconnect Date: _____ Amount Owed: _____
- Received disconnect notice. Company: _____ Date Scheduled: _____ Amount Owed: _____
- Fuel tank empty (or less than 20% in tank). What % is in your tank today: _____ Amount Owed: _____

Please contact your energy company to set up a payment plan.

Do you use electricity to heat your home? Yes No. If **yes**, check the box(es) below to indicate how it is used.

- Furnace fan/blower only
 - Space heaters used as needed
 - Space heaters are the **only** source of heat for one or many rooms. List the room(s): _____
 - Other electric heat used.** Check all that apply: Baseboard Heat In Floor System Electric Furnace Heat Pump
- List the rooms where electric heat type above is the **only** source of heat: _____

If you are not registered to vote, would you like a voter registration card? Yes (You do not have to answer this question)

Would you like 30% of your energy assistance benefit paid on your electric bill? Yes No

Part 5. Consent and Signature for October 1, 2016 to September 30, 2017

1. I give my consent for my heating and electric companies to give data about my account and energy use to the Minnesota Department of Commerce (Commerce) and Commerce's contractors for the Energy Assistance Program (EAP), the Weatherization Assistance Program (WAP) and the Conservation Improvement Program (CIP).
2. I authorize the Social Security Administration and the Minnesota Department of Human Services (MDHS) and its affiliated agencies to share data concerning my Social Security Number and public benefits received within the last year for eligibility for benefits with Commerce and Commerce's contractors for EAP, WAP and CIP.
3. I authorize Minnesota EAP, WAP, and CIP to:
 - Contact my employer to verify my income.
 - If I rent, to contact my landlord to confirm my residency and/or heating source.
4. I authorize my local EAP, WAP and CIP Service Providers to contact me for outreach and referral.
5. By signing, I affirm that all data in this application is correct. I also acknowledge that:
 - I currently reside in the address listed on this application.
 - I am signing on behalf of all household members.
 - I may have to prove my statements.
 - I may be held civilly or criminally liable under federal or state law for knowingly making false or fraudulent statements.
 - I have rights under EAP, WAP, and CIP. I have received a copy of the "Privacy Notice and Your Rights and Responsibilities" and agree to its terms and conditions.
 - I may appeal local Energy Programs Service Provider decisions about my benefits.
 - I understand that filling out this application does not guarantee that my household will receive assistance.
 - I am an adult or emancipated minor.

Print Name: _____

Signature: _____ **Today's Date:** _____

**We must receive your application within 60 days of the date you sign it. This application must be postmarked or received no later than May 31, 2017.
Funds may not last, apply early.**

Privacy Notice and Your Rights and Responsibilities

Privacy Notice

Privacy Act Provisions: Federal and state laws require us to tell you about your rights and responsibilities before we collect and use information about you that is classified as private or confidential. This form provides you with important information that complies with the federal Privacy Act of 1974, 5 U.S.C. § 552a(e)(3) and the Minnesota Government Data Practices Act, Minn. Stat. § 13.04, subd. 2 (also referred to as a Tennessee Warning).

Please read this *Privacy Notice* carefully before completing and signing the *Minnesota Energy Programs Application*, and keep this *Privacy Notice* in your records for future use. This *Privacy Notice* applies to the Energy Assistance Program (EAP), Weatherization Assistance Program (WAP) and Conservation Improvement Program (CIP), also known as Energy Programs.

Why do we collect the information on the application?

We will use your information to research, evaluate and administer the Energy Programs.

We need the information:

- To know you from other individuals.
- To see if you qualify for assistance.
- To allow us to get federal or state funds for the assistance you receive.
- To meet federal or state reporting requirements.

Do you have to give us the information?

You have the right to not give us the information we ask for.

What happens if you give or do not give us the information?

If you give us the information requested on the application, your application will be processed.

If you do not give us that information:

- Your application will not be processed.
- You might not receive services.
- You might not receive help with energy bills.
- Your services might be delayed.

We will keep whatever information you give us, whether or not your application is approved.

Who may see this information?

The following persons may receive information contained in your Energy Programs application if: (i) they need access to the application information to do their jobs in connection with the Energy Programs (EAP, WAP, and CIP), or (ii) they are otherwise authorized by federal or state law to receive it, or (iii) they use the information for reports, to measure outcomes, and for referrals and eligibility purposes:

- Local Energy Programs Service Providers under contract with the Minnesota Department of Commerce.
- Program auditors as required or permitted by Office of Management and Budget (OMB) circulars.
- Minnesota Departments of Administration, Commerce, Employment and Economic Development, Human Services, Revenue and MN.IT Services.
- United States Departments of Health and Human Services and Energy.
- Minnesota Public Utilities Commission.
- Minnesota Legislative Auditor.
- Persons so authorized pursuant to court order or subpoena.
- Your energy companies for affordability and Energy Programs.
- Minnesota Community Action Partnership.
- United States Social Security Administration.
- Lifeline/Telephone Assistance Plan for verifying program eligibility.
- Other agencies or entities as allowed by federal or state law.

Why do we collect Social Security Numbers?

We use Social Security Numbers in the administration of the Energy Programs (EAP, WAP, and CIP) to assure eligible applicants and their household members receive only allowable benefits. Federal law allows us to require you to disclose your Social Security Number in order to process your application and to prevent, detect and correct fraud and abuse. AUTHORITY: Section 205(c)(2)(C)(i) of the Social Security Act, 42 U.S.C. § 405(c)(2)(C)(i). The primary applicant is required to provide his/her verifiable Social Security Number in order to process your application. The Social Security Number of other household members will assist us in processing your application more quickly.

Why do we ask for information about your race?

This is voluntary information. It is compiled and recorded for statistical purposes only. The program cannot discriminate for reason of race or ethnic background, religion, gender, sexual orientation or political affiliation.

Your Rights and Responsibilities

You have certain rights

to get help: You have the right:

- To apply again if you get turned down.
- To apply for more help if you need it.
- To know what the rules are and how we decide what help you get.
- To receive a response within a reasonable time of submitting all information.
- To appeal within 30 days after you are sent the results of your application if:
 - You are turned down or receive a denial letter and you think we used the wrong facts to make the decision.
 - You do not receive the help you were promised.

You have these responsibilities:

You must tell us if you or any member of your household:

- Received help with your energy bills earlier this winter.
- Move to a new address (tell us within 30 days of the move).
- Change your fuel dealer or gas or electric companies.

You must pay your heating and electric bills. This program will pay only part of your bills. You must pay the rest.

What if you think the facts in your file are wrong?

Talk to your local EAP Service Provider about what you think is wrong in your file.

What happens if you give false information?

The local EAP Service Providers or the Minnesota Department of Commerce may check and verify any of the information contained on your application or otherwise provided. You may be denied Energy Program benefits if you provide incomplete or false information. You may be held civilly or criminally liable under federal or state law for knowingly making false or fraudulent statements on your application.

How do you complain?

If you think your energy payment was not what it should be or you did not get the services you thought you would, you may contact the local EAP Service Provider listed on the application. If you are not satisfied with their answer, you may write an appeal letter to the local EAP Service Provider. Keep a record of their address and telephone number.

If you are not satisfied with their response to your appeal, write to: Appeals Officer
Energy Assistance Program
Minnesota Department of Commerce
85 East 7th Place, Suite 500
St. Paul, MN 55101-2198

If you feel you have been treated differently because of your color, race, national origin, religion, sex, age, marital status, political beliefs, or physical, mental or emotional disability, write to one of the following:

Minnesota Department of Human Rights
Freeman Building
625 Robert Street North
St. Paul, MN 55155
www.humanrights.state.mn.us

-OR- U.S. Department of Health and Human Services
Office for Civil Rights, Region V
233 North Michigan Avenue, Suite 240
Chicago, IL 60601
www.hhs.gov/ocr/civilrights/complaints

Ask for Assistance:

Call the local EAP Service Provider listed on the application to request the application in Spanish. If you do not understand the information in this document, call your local EAP Service Provider and ask for assistance. Their telephone number is usually listed on the first page of the Minnesota Energy Programs Application.