

April 30, 2015

Mr. Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, Minnesota 55101

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket Nos.: G004/M-15-306, G008/M-15-307, G011/M-15-308,
G001/M-15- 309, G002/M-15-314, G022/M-15-315

Dear Mr. Wolf,

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

Minnesota Natural Gas Utilities' 2013 Gas Affordability Program (GAP) Annual reports.

The annual reports were filed on March 31, 2015 by:

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The Department recommends acceptance of the GAP reports for Xcel Energy, CenterPoint Energy, Minnesota Energy Resources Corporation and Great Plains Natural Gas, and requests additional information from Interstate Power and Light, and Greater Minnesota Gas and is available to answer any questions the Minnesota Public Utilities Commission may have in this matter.

Sincerely,

/s/ SUSAN L. PEIRCE
Rates Analyst

SLP/lt
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET NOS. G004/M-15-306, G008/M-15-307, G011/M-15-308,
G001/M-15-309, G002/M-15-314, G022M-15-315

I. BACKGROUND INFORMATION

Mann Stat. §216B.16, Subd. 16 require public utilities serving low-income residential ratepayers who use natural gas for heating to file an affordability program with the Minnesota Public Utilities Commission (Commission). Low-income residential ratepayers are defined by the statute as ratepayers receiving energy assistance from the Low-Income Home Energy Assistance Program (LIHEAP). The statute requires that any affordability program must:

- 1) Lower the percentage of income that participating low-income households devote to energy bills;
- 2) Increase participating customer payments over time by increasing the frequency of payments;
- 3) Decrease or eliminate participating customer arrears;
- 4) Lower the utility costs associated with customer account collection activities; and
- 5) Coordinate the program with other available low-income bill payment assistance and conservation resources.

In a series of Orders in each respective docket,¹ the Commission required utilities to report the following information in their annual reports:

- Customer payment frequency (including partial and late payment information);
- Disconnections;
- Payment amounts;
- Customer Payment history

¹ See *Order Accepting Compliance Filings Regarding Gas Affordability Program and Requiring Further Action*, November 18, 2009, and *Order Accepting Gas Affordability Program Reports, Deferring Action on Another, and Requiring Further Action*, September 22, 2010 in Docket Nos. G004/M-07-1235, G007,011/M-07-1131, G008/GR-05-1380, G001/M-07-1295, and G002/GR-06-1429.

- Arrearage levels;
- Coordination with other available low-income payment assistance and conservation resources; and
- Customer complaints

Additionally, in its September 22, 2010 Order the Commission required all natural gas utilities to:

- Implement an application processing goal;
- Assess periodically whether the use of their third-party administrator is the most effective and efficient arrangement;
- Require the third-party administrator to make the Gas Affordability Program (GAP or Program) application available on their website;
- Provide reminders to GAP participants when payments are missed, and;
- Cross-promote GAP with other programs.²

Finally in an Order dated September 25, 2013, the Commission required utilities to file a summary schedule that includes the following information:

- average annual affordability benefit received per customer;
- average annual arrearage forgiveness benefit received per customer;
- percentage of LIHEAP customers that participated in GAP;
- disconnection rates for (a) GAP customers, (b) LIHEAP-non-GAP customers, and (c) non-LIHEAP customers (all firm customers including Commercial and Industrial C&I);
- number of GAP participants enrolled as of year-end;
- number of GAP participants enrolled and receiving benefits at some time during the year;
- annual program budget;
- actual program revenue;
- actual program cost;
- GAP tracker balance as of year-end; and
- GAP rate-affordability surcharge (\$/therm).³

The following utilities submitted their GAP 2014 annual reports in the following dockets:

- Great Plains Natural Gas Company (Great Plains) in Docket No. G004/M-15-306;
- CenterPoint Energy (CenterPoint) in Docket No. G008/M-15-307;

² *Order Accepting Gas Affordability Program Reports and Requiring Further Action*, December 29, 2011 in Docket Nos. G004/M-07-1235, G007,011/M-07-1131, G008/GR-05-1380, G001/M-07-1295, and G002/GR-06-1429.

³ *Order Accepting Gas Affordability Program Reports*, September 25, 2013 in Docket Nos. G004/M-07-1235, G007,011/M-07-1131, G008/GR-05-1380, G001/M-07-1295, and G002/GR-06-1429.

- Minnesota Energy Resources Corporation (MERC) in Docket No. G011/M-15-308;
- Interstate Power and Light Company (IPL) in Docket No. G001/M-15-309;
- Xcel Energy (Xcel) in Docket No. G002/M-15-314; and
- Greater Minnesota Gas, Inc. (GMG) in Docket No. G022/M-15-315.

II. DEPARTMENT ANALYSIS

The Department reviewed the GAP reports for each utility for the information required by the various Commission Orders cited above. Xcel, Great Plains, MERC and CenterPoint have submitted all of the information required by the Commission Orders. IPL did not include information required by the Commission's December 29, 2011 Order. The Department has contacted IPL regarding that omission, and requests that the Company submit the information in reply comments. With respect to GMG, the Department has outstanding information requests (IRs) requesting information required by the Commission's September 25, 2013 Order. The Department requests that GMG submit its responses to Department IRs along with the information required by the Commission's December 29, 2011 Order in reply comments. Attachment A to these comments provides a summary of the schedules submitted in response to the Commission's September 13, 2013 Order.

In addition to the general reporting requirements required of all utilities, Great Plains, CenterPoint and Xcel have individual reporting requirements established by the Commission at the time of its approval of the utility's GAP program. The Department offers the following comments on these individual requirements below.

A. GREAT PLAINS NATURAL GAS

In the May 12, 2008 Order approving its GAP, Great Plains was ordered to submit:

- An evaluation of the assumed GAP participation rate of five percent in light of actual participation in the Program;
- The actual annual average cost per participant for the Program, and an explanation of deviations from the assumed average annual cost per participant of \$555; and
- Great Plains' conclusion regarding the reported evaluation data.

In 2014, the number of GAP applications Great Plains received increased 8.7 percent from the previous year, to 423 applications. In comparison, LIHEAP applications increased by 4.6 percent in 2014. Of the 423 applicants, 230 qualified for GAP and 182 were enrolled in the Program. GAP participants represent approximately 1 percent of Great Plains' total residential customers, and 10 percent of its customers qualifying for LIHEAP.

The average cost per GAP participant was \$163.71 in 2014 compared with the original assumed cost per participant of \$555. Great Plains indicates that the difference is largely

due to the number of customers enrolled in GAP without arrears, customers continuing to exceed the current household income requirement for participation, and lower gas costs.

Beginning in 2012, Great Plains' GAP surcharge was set to \$0.0 per dekatherm. The Commission extended the Program with a continued \$0.0 per dekatherm surcharge through 2016 in a November 26, 2014 Order. In January 2015, the Company advised the Commission that it was switching third-party administrators for its GAP program from West Central Minnesota Community Action to the Salvation Army of Roseville. Great Plains continues to work with the Salvation Army to promote its GAP program.

The Department concludes that Great Plains has provided the information required by the Commission.

B. CENTERPOINT ENERGY

In its November 22, 2010 *Order Evaluating Gas Affordability Program, Extending and Modifying Pilot Program, Authorizing Cost Recovery and Requiring Future Reporting* in Docket No. E008/GR-05-1380, the Commission required that:

- CenterPoint shall, in future reporting, report 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;
- CenterPoint shall use actual disconnection and reconnection rates to estimate disconnection and reconnection costs for the remainder of the pilot period, not disconnection rates from 2009; and
- CenterPoint shall report data on the number of people who do not qualify for credits, including zero-credit customers.

CenterPoint listed conservation measures available to GAP participants as including installing a programmable thermostat, lowering the water heater setting; adjusting window treatments according to season and time of day; installing a low-flow showerhead and faucet aerator; and weather-stripping. In addition, the Company makes a number of conservation measures available to qualifying low-income customers at no cost including a home energy audit, weatherization, and furnace, boiler and water heater tune-up or replacement. CenterPoint included a list of outreach activities and organizations with which it engages.

For 2014, CenterPoint reported a 5 percent disconnect rate for GAP customers, compared with 11.9 percent for LIHEAP non-GAP customers, and 2.6 percent for all firm customers.

Finally, CenterPoint reported that 2,813 customers applied for GAP, but were not enrolled because their incomes and usage made them ineligible for affordability or arrearage credits.

The Department concludes that CenterPoint has provided the information required by the Commission.

C. XCEL GAS

In its October 26, 2012 *Order Accepting Gas Affordability Program Evaluation and Requiring Program to Continue as Modified* in Docket No. E002/GR-06-1429, the Commission required Xcel to reduce its gas affordability program surcharge rate for four years to a level that will reduce its GAP tracker balance by approximately \$1 million and that will also allow for an increase in outreach and participation levels.

The Commission directed Xcel to reduce its gas affordability program surcharge rate from \$0.00445 to \$0.00400 per therm beginning January 1, 2013. As a result of the reduction, Xcel reported a reduction of \$305,264 in 2014 from the amounts it would have collected had the surcharge remained at \$0.00445 per therm. Xcel forecasted a reduction of \$264,000 for 2015. Xcel reported a year-end 2014 tracker balance of \$1,458,854, a decrease of \$581,135 from its 2013 balance. The Company attributed its tracker balance decrease to a combination of lower surcharge revenues and increased outreach. Xcel stated that it continues its additional outreach efforts begun in 2013.

D. MULTI-YEAR EVALUATIONS

Each utility's GAP program is authorized to continue through the following year-end:

- Interstate Power & Light – 2015
- MERC – 2015
- Greater Minnesota Gas – 2015
- CenterPoint – 2016
- Great Plains – 2016
- Xcel – 2016

Prior to reauthorization each utility is required to submit a multi-year evaluation, including a financial evaluation of the Program. The Department will submit comments on each of the evaluation filings after the evaluation has been submitted. The evaluations will include each utility's discussion on how its GAP achieved the goals set forth in Minn. Stat. §216B.16, subd. 15, and each utility's financial evaluation of the Program, as required by tariff. The Department believes that use of the multi-year data included in the evaluations, rather than the single-year data provided in the annual GAP reports, provides a better perspective for identifying successes and areas needing improvement in the GAPs.

Docket Nos. G004/M-15-306, G008/M-15-307, G011/M-15-308, G001/M-15-309,
G002/M-15-314, G022M-15-315

Analyst assigned: Susan L. Peirce

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III. SUMMARY OF DEPARTMENT RECOMMENDATIONS

The Department recommends that the Commission:

- Accept Xcel's 2014 GAP Report submitted in Docket No. G002/M-15-314;
- Accept Great Plains' 2014 GAP Report submitted in Docket No. G004/M-15-306;
and
- Accept CenterPoint's 2014 GAP Report submitted in Docket No. G008/M-15-307.

The Department requests that Interstate Power & Light submit the information required by the Commission's December 29, 2011 Order in reply comments.

The Department requests that Greater Minnesota Gas submit the information required by the Commission's December 29, 2011 Order, along with responses to outstanding Department information requests, in reply comments.

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DOC Attachment A: 2014 GAP Annual Compliance Summary

	Great Plains	MERC	CenterPoint	IPL	Xcel	Greater MN Gas
Avg. Annual Affordability Benefit per customer	\$179.63	\$305	\$381.04	\$514.58	\$264	\$59.50
Avg. Annual Arrearage Forgiveness per customer	\$60.87	\$7.31	\$265.90	\$16.33	\$33	\$56.70
% of LIHEAP customers participating in GAP	10.2%	15%	34.5%	4.0%	38%	12%
Disconnection rates for:						
(a) GAP customers	13.2%	2.0%	5.0%	0%	6%	
(b) LIHEAP-non-GAP	28.6%	13.0%	11.9%	0.009%	11%	
(c) All firm customers	3.9%	3%	2.6%	0.0116%	1%*	
No. of GAP participants at year-end	121	1,750	13,310	86	6,775	5
No. of GAP participants enrolled & receiving benefits at some time during the year	182	2,060	17,763	107	10,620	9
Annual Program budget	\$50,000	\$1,000,000	\$5,000,000	\$50,000	\$2,500,000	
Actual Program revenue	\$0	\$1,457,066	\$5,993,502	\$47,795	\$2,711,471	
Actual Program cost	\$32,295	\$891,575	\$6,631,073	\$1,947	\$3,292,606	
GAP tracker balance as of year-end	\$62,304	\$1,106,456	\$2,037,172	\$19,341	\$1,458,854	
GAP rate-affordability surcharge (\$/therm)	\$0	\$0.00441	\$0.00519	\$0.0023	\$0.0040	

- All Res, non-GAP, non-LIHEAP 1%, all firm less than 1%

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-15-306; G008/M-15-307; G011/M-15-308;
G001/M-15-309; G002/M-15-314; and G022/M-15-315**

Dated this 30th day of April 2015

/s/Sharon Ferguson

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