

May 14, 2025

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

RE: Comments of the Minnesota Department of Commerce
Docket No. E,G-999/PR-25-2

Dear Mr. Seuffert:

Attached are the comments of the Minnesota Department of Commerce (Department) in the following matter:

In the Matter of Recent Utility Cold Weather Reports (CWR) Rule Data.

The Notice of Comment Period (Notice) on Recent CWR Data was issued by the Minnesota Public Utilities Commission on February 25, 2025.

The Department provides the following recommendations in response to the issue-related questions in the Notice under sections A and B of these comments. The Department provides recommendation on the topic-related questions included under C.

- A1. The Department recommends the Commission take no action on the Residential Customer Status Data reporting in Docket No: E, G999/PR-25-02 currently.
- A.2. The Department recommends the Commission develop the record further in this proceeding in two ways:
 - o require Xcel to track the effects of the recently approved service disconnection, payment arrangements and various customer protections and assistance, the effects of those changes on Xcel's bad debt expense and to provide that information to the Commission in a compliance filing containing one year of actual data.
 - o extend those same reporting requirements to CenterPoint.
- A.3. For the state's other regulated utilities (except CenterPoint), the Department recommends the Commission require a

compliance filing that addresses the administration of their service disconnection and complaint resolution efforts.

- *B.1.* The Department recommends the Commission extend CUB/LSAP's second recommendation only if an analysis of each utility's disconnection, payment arrangement policies and practices demonstrate it has not managed its disconnection and complaint processes competently for the same reasons listed in the Department's response to the previous question.
- *C.1.* The Department has no recommendations for this topic.
- *C.2.* The Department recommends that the Commission can remedy unsatisfactory performance, via a quality-of-service plan that includes financial penalties (disincentives) like that approved for Xcel.
- *C.3.* The Department recommends if the Commission wants the utilities other than Xcel to provide equity-related information that the Commission:
 - require those regulated utilities to provide the following information:
 - Customers Experiencing Lengthy Interruptions of 12 hours or more (CELI-12);
 - Customers Experiencing Multiple Interruptions of six or more (CWMI-6);
 - Disconnections;
 - CIP Low Income Program participation; and,
 - Customers Participating in Low Income Energy Affordability Program Participation (LI EAP).¹

Or the Department recommends the Commission ask the utilities other than Xcel, to provide comments on the relative difficulty of gathering the information listed above and performing the linear regression analysis needed and to provide that information in a compliance filing.

- *C.4.* The Department requests utilities other than MERC and Xcel provide this information in supplemental comments. The Department will review that information and provide its recommendation in supplemental comments.
- *C.5.* The Department has no recommendation for this topic.
- *C.6.* The Department requests utilities affected utilities provide this information in supplemental comments. The Department will review that information and provide its recommendation in supplemental comments.
- *C.7.* The Department recommends the Commission require DEA, Greater Minnesota Gas and Otter Tail Power provide a response to this topic.
- *C.8.* The Department has no recommendation for this topic.

¹ This recommendation assumes Commission Staff would be responsible for the linear regression analyses that would be needed to be completed.

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The Department is available to answer any questions the Minnesota Public Utilities Commission (Commission) Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

JK/ad
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. E, G-999/PR-25-2

I. INTRODUCTION

Minn. Stat. § 216B.096 governs the Cold Weather Rule (CWR) and the reporting requirements for the CWR for public utilities. Minn. Stat. § 216B.091 prescribes the data about residential customers each public utility must report monthly to the Commission.

On March 25, 2020 the Commission opened Docket No. E,G-999/CI-20-375 and requested utilities take the following actions voluntarily for the duration of the national security or peacetime emergency:²

1. Extend the protections of Minnesota's Cold Weather Rule provided under Minnesota Statutes sections 216B.096 (public utilities), . . . by restricting disconnection of residential customers for non-payment of utility bills and reconnecting customers that have been disconnected for the duration of the national security or state peacetime emergency. This request shall not affect the utility's ability to disconnect a customer's service for public safety concerns unrelated to non-payment of services.
2. Waive late fees that any residential or small business customer incurs because of the economic circumstances related to the coronavirus pandemic.
3. Arrange payment plans for customers requesting help during this time that is based on the financial resources and circumstances of the customer.³

The eight affected rate-regulated electric and public gas utilities filed the information required in the COVID-19 Inquiry in a Microsoft Excel template Commission Staff developed titled "*Residential Customer Status Report*".^{4, 5}

² *Combatting Price Gouging During the COVID-19 Peacetime Energy*, Emergency Executive Order issued by Governor Walz, (March 13, 2020) [Executive Order 20-10](#).

³ *In the Matter of an Inquiry into Actions by Electric and Natural Gas Utilities in Light of the COVID-19 Pandemic Emergency*, March 25, 2020, Docket No. E, G-999/CI-20-375, (eDockets) [20203-161448-02](#) (hereinafter "the COVID-19 inquiry").

⁴ The eight rate-regulated electric and gas utilities are: CenterPoint Energy, Dakota Electric Association, Greater Minnesota Gas, Great Plains Natural Gas Company, Minnesota Energy Resources Corporation, Minnesota Power, Otter Tail Power Company, and Xcel Energy.

⁵ Available at [Energy / Public Utilities Commission](#).

In May 2021, the Commission defined a “transition period” back to normal service for disconnections and reporting.⁶

II. PROCEDURAL BACKGROUND

September 30, 2024	The Commission posted a Notice of Comment Period on Cold Weather Rule (CWR) Reports for Regulated Gas and Electric Companies in Docket No. E, G-999/PR-24-02 (24-02 docket). ⁷
December 20, 2024	Commission staff issued five information requests to Xcel Energy. ⁸
January 31, 2025	The Citizens Utility Board of Minnesota (CUB) and the Legal Services Advocacy Project (LSAP) filed joint comments in the 24-02 docket. ⁹
February 10, 2025	CenterPoint Energy of Minnesota (CenterPoint, CPE) filed reply comments in the 24-02 docket. ¹⁰
February 10, 2025	Xcel Energy filed its responses to Staff IRs 1 through 5. ¹¹
February 28, 2025	The Commission issued a Notice of Comments in Docket No. E, G-999/PR-25-02 (25-02) docket. ¹²
March 31, 2025	Great Plains Natural Gas (GPNG) and Minnesota Energy Resources Corporation (MERC) each filed Comments in response to Notice 25-02. ^{13, 14}
March 31, 2025	CenterPoint filed reply comments in response to Notice 24-02. ¹⁵

⁶ *In the Matter of an Inquiry into Actions by Electric and Natural Gas Utilities in Light of the COVID-19 Pandemic*, Order Adopting Broad Transition Plan Proposal, Suspending Negative Reporting, and Establishing Notice and Communication Requirements, May 26, 2021, Docket No. E, G-999/CI-20-375, (eDockets) [20215-174514-01](#)

⁷ *In the Matter of Recent Utility Cold Weather Rule Data*, Notice of Comment Period, September 30, 2024, Docket No. E, G-999/PR-24-02 (eDockets) [202249-210572-01](#) (Hereinafter “Notice 24-02”).

⁸ *In the Matter of Recent Utility Cold Weather Rule Data*, Staff Information Requests 1 through 5, December 20, 2024 Docket No. E, G-999/PR-24-02, (eDockets) [204412-213270-01](#) (Hereinafter “Staff IRs”).

⁹ *In the Matter of Recent Utility Cold Weather Rule Data*, Citizens Utility Board of Minnesota and the Legal Services Advocacy Project, Comments, January 31, 2025, Docket No. E, G-999/PR-25-02, (eDockets) [20251-214781-01](#) (Hereinafter “CUB/LSAP Comments”).

¹⁰ *In the Matter of Recent Utility Cold Weather Rule Data*, CenterPoint Energy of Minnesota, Reply Comments, February 10, 2025, Docket No. E, G-999/PR-25-02, (eDockets) [20252-215187-01](#)

¹¹ *In the Matter of Recent Utility Cold Weather Rule Data*, Xcel Energy, Responses to Staff IRs 1 through 5, February 10, 2025, Docket No. E, G-999/PR-25-02, (eDockets) [20252-215113-01](#), [20252-215113-03](#), [20252-215113-04](#), [20252-215113-05](#), [20252-215113-06](#) (Hereinafter “Xcel IR Responses”).

¹² *In the Matter of Recent Utility Cold Weather Rule Data*, Notice of Comment Period, February 28, 2025, Docket No. E, G-999/PR-25-02, (eDockets) [20252-215860-01](#) (Hereinafter “Notice 25-02”).

¹³ *In the Matter of Recent Utility Cold Weather Rule Data*, Great Plains Natural Gas Comments, March 31, 2025, Docket No. E, G-999/PR-25-02, (eDockets) [20253-216897-01](#) (Hereinafter “Great Plains Comments”).

¹⁴ *In the Matter of Recent Utility Cold Weather Rule Data*, Minnesota Energy Resources Corporation Comments, March 31, 2025, Docket No. E, G-999/PR-25-02, (eDockets) [20253-217010-01](#) (Hereinafter “MERC’s Comments”).

¹⁵ *In the Matter of Recent Utility Cold Weather Rule Data*, CenterPoint Reply Comments, March 31, 2025 Docket No. E, G-999/PR-24-02 (eDockets) [20253-217049-01](#) (Hereinafter “CenterPoint’s Reply Comments”).

April 18, 2025 CUB/LSAP filed reply comments in response to Notice 25-02.¹⁶
April 29, 2025 Minnesota Power requested a 14-day extension to the May 2, 2025 comment deadline.¹⁷

Topic(s) open for comment:

- Considering the data filed in Docket No. E, G-999/PR-25-2, should any trends in the data be highlighted for the Commission?
- What action, if any, should the Commission require utilities to take to continue exemplary performance or remedy unsatisfactory performance?
- What does an analysis of the data reported in this docket reveal about equitable delivery of utility service?
- How do utilities currently communicate information on disconnection and payment? arrangements to non-English language speakers, especially to people who do not read their native language?
- Considering Staff's information request (IR) for Xcel filed on December 20, 2024 in Docket No. E, G-999/PR-24-02 and Xcel's IR responses filed on February 7, 2025, are the utilities following the CWR appeal process in Minn. Stat. 216B.096, Subd 8?
- Are utilities' heat-affected customers, particularly for customers with electricity service necessary to operate gas heating equipment, being provided with appropriate protections during CWR season (October 1 – April 30), including site visits before any disconnections for non-payment?
- Are utilities' responses to the above "Topics for Utilities" satisfactory? If not, what additional information or work is needed?
- Are there other issues or concerns related to this matter?

III. DEPARTMENT ANALYSIS

A. *SHOULD THE COMMISSION TAKE ANY ACTION ON THE RESIDENTIAL CUSTOMER STATUS DATA REPORTED IN DOCKET NO. E, G-999/PR-25-2, INCLUDING SERVICE DISCONNECTIONS, PAYMENT ARRANGEMENTS, AND VARIOUS CUSTOMER PROTECTIONS AND ASSISTANCE?*

The Citizens Utility Board of Minnesota (CUB) and the Legal Services Advocacy Project (LSAP) filed comments which recommend the Commission extend the reporting requirements adopted in Xcel's

¹⁶ *In the Matter of Recent Utility Cold Weather Rule Data*, CUB/LSAP Reply Comments, April 18, 2025, Docket No. E, G-999/PR-25-02 (eDockets) [20254-217878-02](#) (Hereinafter "CUB/LSAP Reply Comments").

¹⁷ *In the Matter of Recent Utility Cold Weather Rule Data*, Minnesota Power Extension Request – Comment Period, April 29, 2025, Docket No. E, G-999/PR-25-02, (eDockets) [20254-218312-01](#) (Hereinafter MP Extension Request").

2023 Safety, Reliability and Service Quality Report to all utilities required to file reports in the E,G - 999/PR-YR-02:¹⁸

- The Commission should require transparency in utility practices
 - Require all utilities to provide compliance filings detailing their current policies for disconnections, service deposits and payment agreements.
 - For companies requiring down payments or service deposits, these compliance filings would explain how the Company determines those amounts relative to the customer's financial and extenuating circumstances.
 - Require all utilities to submit additional filings in Docket No. E, G-999/PR-YR-02 when they modify their policies and practices.
 - Require all utilities to discuss disconnections due to a landlord's failure to pay.
 - Publish information on their websites describing their policies and practices and informing customers of their right to a payment plan that accounts for household financial circumstances and includes contact information for the Public Utilities Commission's Consumer Affairs Office (CAO), CUB and LSAP.
- The Commission should require utilities to conduct proactive outreach to affordability program participants about low-income conservation program opportunities.¹⁹

CUB/LSAP developed these reporting requirements in conjunction with Xcel Energy in Xcel's 2023 Annual Safety, Service Quality and Service Reliability docket. While the Department sees value in the reporting requirements that CUB/LSAP and Xcel developed in that proceeding, even going so far as to support a settlement between the parties, the Department would like to see that process work for some period before extending it to the state's other regulated utilities.

In addition, the Department notes the CUB/LSAP/Xcel reporting requirements were developed in response to an extreme spike in the number of disconnections and complaints that resulted from some unique circumstances. Hence, the Department questions the value of requiring utilities who are managing their disconnection and complaint areas competently to adopt those reporting requirements. The Department summarizes the 2024-2025 CWR information in Table 1.

¹⁸ *In the Matter of Xcel Energy's, Minnesota Power's and Otter Tail Power's 2023 Annual Safety, Reliability and Service Quality Reports*, Order Accepting Reports and Setting Additional Requirements, Order Points 22, 23, and 34, January 13, 2025, Docket Nos. E002/M-24-27, E015/M-24-29 and E017/M-24-30, (eDockets) [20251-213880-01](#) (Hereinafter 24-27 docket).

¹⁹ *In the Matter of Recent Utility Cold Weather Rule Data*, CUB/LSAP Comments p. 5-6, January 31, 2025, Docket E, G-999/PR-25-02 (eDockets) [20251-214781-02](#).

Table 1 – Comparison of the Number of Customers Disconnected for Nonpayment by Utility October 2024 through April 2025

Utility	# of Disconnected Customers – Early October 2024	# of Disconnected Customers – Late April Early May 2025	% of Customers Disconnected – Early October 2024	% of Customers Disconnected – Early May 2024
CenterPoint	3,797	1,606	0.41%	0.19%
Dakota Electric Association (DEA)	69	8	0.06%	0.01%
Greater Minnesota Gas	6	1	0.06%	0.01%
Great Plains Natural Gas	0	46	0%	0.24%
MERC	1,913	968	0.88%	0.24%
Minnesota Power	155	211	0.14%	0.20%
Otter Tail Power	1,171	1,334	2.24%	2.55%
Xcel Energy	1,144	187	0.09%	0.01%

Nominally, CenterPoint, DEA, Great Plains Natural Gas, MERC and Xcel Energy all lowered the number of customers disconnected for non-payment between the beginning and the end of the 2024-2025 heating season. Minnesota Power and Otter Tail Power Company saw increases in the number of customers disconnected for nonpayment over that same time. The percentage of customers disconnected also decreased for all the utilities except for Minnesota Power and Otter Tail Power. This information suggests the utilities’ policies regarding disconnection appear to be working in general.

If the Commission believes the information in Table 1 identifies issues with all the utilities’ disconnection, service deposit and payment agreement policies, the Commission should approve CUB/LSAP’s first recommendation. If not, it should extend those reporting requirements only to those utilities whose disconnection, service deposit and payment agreement do not provide adequate protection to ratepayers.

The Department does not usually have concerns about the inclusion of additional reporting requirements within the context of a single docket. CUB/LSAP’s recommendations, in seeking to extend a sub-set of the recommendations from the 24-27 docket to the remaining six regulated utilities in the absence of any information that suggest those utilities’ disconnection and reconnection policies or payment arrangements are inadequate from a ratepayer perspective seem overly broad. The Department agrees in concept with CUB/LSAP’s premise that regulated utilities should follow reasonable policies and protocols related to these issues. The Department is not comfortable extending recommendations developed and agreed to in one docket, with one specific set of circumstances to the remaining regulated utilities. If a utility agrees voluntarily to CUB/LSAP’s

recommendations, as CenterPoint already has, then the Department presumes the utility is acting in its own interest and has no further comment.

In the alternative situation, where a utility has not voluntarily agreed to CUB/LSAP's recommendations, the Department recommends the Commission consider extending those reporting requirements to those utilities only after it has determined if these new policies Xcel initiated as a part of the 24-27 docket are working as intended and only to the regulated utilities under its jurisdiction who it has identified as managing their disconnection and complaint policies poorly.

The Department bases its position on the efficiency and equity of only extending reporting requirements that have been proven to be effective in practice. To extend those same reporting requirements to utilities whose past performance has been adequate is economically inefficient.

Hence, The Department recommends the Commission take no action on the Residential Customer Status Data reporting in Docket No. E, G999/PR-25-02 currently. Rather, the Department recommends the Commission develop the record further in two ways.

First, require Xcel to track the effects of the recently approved service disconnection, payment arrangements and various customer protections and assistance and to provide that information to the Commission in a compliance filing containing one year of actual data. Second, the Department recommends extending that same requirement to CenterPoint to determine whether the results are consistent for the two utilities.

To determine whether the state's other regulated utilities administer their service disconnection and complaint resolution protocols efficiently and equitably, the Department recommends the Commission require a compliance filing to address those questions in the YR-02 annual docket.

B. SHOULD UTILITIES BE REQUIRED TO DEVELOP DISCONNECTION AND PAYMENT ARRANGEMENT POLICIES AND MAKE THEM PUBLIC? ONCE THE POLICIES ARE DEVELOPED, SHOULD THERE BE ANY OTHER MODIFICATIONS MADE TO THEM?

The Department recommends the Commission extend CUB/LSAP's second recommendation only if an analysis of each utility's disconnection, payment arrangement policies and practices demonstrate it has not managed its disconnection and complaint processes competently for the reasons listed in the Department's response to the previous question.

C. RESPONSE TO NOTICE TOPICS

- C.1 Considering the data filed in Docket No. E, G-999/PR-25-2, should any trends in the data be highlighted for the Commission?

The Department discussed this topic in its response to the question included in Section A above.

- C.2 What action, if any, should the Commission require utilities to take to continue exemplary performance or remedy unsatisfactory performance?

The Department recommends that the Commission can remedy unsatisfactory performance via a quality-of-service plan that includes financial penalties (disincentives) like that approved for Xcel.²⁰

- C.3 *What does an analysis of the data reported in this docket reveal about equitable delivery of utility service?*

Xcel Energy is the only public utility in Minnesota the Commission has evaluated for equitable utility service delivery. Some additional context on this topic may be of value.

Dr. Gabriel Chan submitted testimony in Docket No. E002/GR-21-630 on this topic.²¹ Dr. Chan's analysis focused on the correlation between race and utility disconnection. In that analysis, Dr. Chan used a linear regression methodology that found disconnections were higher in census block groups with a larger proportion of People of Color (POC). His linear regression analysis also controlled for income and poverty in that analysis.

In its 2023 Annual SRSQ Report, Xcel included the results of an equity analysis performed by TRC Companies (TRC) that attempted to determine if information on five different metrics listed on the Company's interactive service reliability map could identify any disparities in performance on those indicators. The five metrics included were:

- Customers Experiencing Lengthy Interruptions of 12 hours or more (CELLI-12);
- Customers Experiencing Multiple Interruptions of six or more (CWMI-6);
- Disconnections;
- CIP Low Income Program participation; and,
- Customers Participating in Low Income Energy Affordability Program Participation (LI EAP).

TRC also used data from three additional variables from the American Community Survey provided by the United States Census Bureau:

- Home ownership rates along with housing vintage information, (used by TRC as proxies for wealth);
- Limited English proficiency, home computer access, and home internet access, (used by TRC as proxies for ease of communication);

²⁰ *In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Amendments to its Natural Gas and Electric Service-Quality Tariffs Originally Established in Docket No. E,G-002/CI—02-2034*, Order Approving Amendments to Service Quality Tariff, August 12, 2013, Docket No. E, G002/M-12-383, (eDockets) [20138-90198-03](#)

²¹ *In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in Minnesota*, Direct Testimony and Attachments of Dr. Gabriel Chan at p. 34, October 3, 2022, Docket No. E002/GR-21-630, (eDockets) [202210-189513-04](#)

- Home computer access, home internet access, and distance to the nearest payment center that accepts payments for Xcel Energy, used as proxies for access to payment options.²²

It appears that the only information provided in this docket that was used in both Dr. Chan's and TRC's equity analyses is disconnections for non-payment.

If the Commission wants to require regulated utilities to develop these analyses, then it should require the utilities to provide the information TRC listed as having used in its equity study, assuming Commission Staff can perform the required linear regression analyses. In the alternative, the Commission could ask the different utilities to provide comments on the relative difficulty of gathering the information listed above and to perform the linear regression analysis needed and to provide that information in a compliance filing.

- *C.4 How do utilities currently communicate information on disconnection and payment arrangement policies to non-English speakers, especially to people that do not read their native language?*

MERC identified the following resources it provides for non-English speakers:

- Its website containing information on payment arrangements provides a hyperlink button that allows customers to view the website in Spanish.
- Google Chrome has the capability to translate any web page.
- Bilingual Care Center Agents and;
- Language Line Service which is available 24 hours daily and provides translations for over 140 languages.²³

The Department considers MERC's response adequate. The remaining seven regulated utilities did not provide a response to this question. The Department requests those same utilities provide this information in supplemental comments. The Department will review that information and provide its recommendation in supplemental comments.

- *C.5 Considering Staff's information request (IR) for Xcel filed December 20, 2024 in Docket No. E, G-999/PR-24-2 and Xcel's IR responses on February 7, 2025 are the utilities following the CWR appeals process in Minn. Stat. 216B.096, Subd. 8?*

The Department reviewed Xcel's responses to those Staff IRs. It appears to the Department Xcel is following the CWR appeals process in Minn. Stat. § 216B.096, subd. 8.

²² *In the Matter of Northern States Power Company's Annual Report on Safety, Reliability, and Service Quality for 2023 and Petition for Approval of Electric Reliability Standards for 2024*, Compliance Filing at p. 106, April 1, 2024, Docket No. E,002/M-24-27, (eDockets) [20244-204892-01](#)

²³ *In the Matter of Recent Utility Cold Weather Rule Data*, (MPUC Docket E, G-999/PR-25-02) Reply Comments. p. 6-7 (March 31, 2025) (eDockets) [20253-217010-01](#).

At the same time, the Department also recognizes it does not interact with ratepayers and utilities on a customer-specific basis regularly and that other parties that do have more expertise and experience on this topic.

The Department will review other parties' reply comments in this proceeding. If one or more provides an analysis that demonstrates Xcel is not following the CWR appeals process correctly, the Department will file supplemental comments on that topic.

- *C.6 Are utilities' heat-affected customers, particularly for customers with electricity service necessary to operate gas heating equipment, being provided with appropriate protections during CWR season (October 1 – April 30), including site visits before any disconnections or non-payment? How are utilities ensuring that its records of heat-affected customers are accurate?*

The Department reviewed MERC's discussion on this topic in its comments. The Department found MERC's response to be reasonable. No other utility provided information on this topic. The Department requests affected utilities to provide this information in supplemental comments. The Department will review that information and provide its recommendation in supplemental comments.

- *C.7 Are utilities' responses to the above "Topics for Utilities" satisfactory? If not, what additional information or work is needed?*

The Department considered the utilities' responses to the category of "Topics for Utilities" in the Notice to be inadequate. Only Great Plains, MERC and potentially Minnesota Power have or will have filed responses in this proceeding. The Department recognizes that Xcel and CenterPoint have effectively removed themselves from this discussion. DEA, Otter Tail Power, Greater Minnesota Gas have not yet provided responses. The Department concludes that those three utilities' responses are not satisfactory.

- *C.8 Are there other issues or concerns related to this matter??*

The Department didn't identify any additional issues or concerns. If another party discusses any additional concerns in this set of comments, the Department will address it in supplemental comments.

IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of the comments and reply comments filed in this docket and the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

- A. *SHOULD THE COMMISSION TAKE ANY ACTION ON THE RESIDENTIAL CUSTOMER STATUS DATA REPORTED IN DOCKET NO. E, G-999/PR-25-2, INCLUDING SERVICE DISCONNECTIONS, PAYMENT ARRANGEMENTS, AND VARIOUS CUSTOMER PROTECTIONS AND ASSISTANCE?*

- A1. The Department recommends the Commission take no action on the Residential Customer Status Data reporting in Docket No: E, G999/PR-25-02 currently.
 - A.2. The Department recommends the Commission develop the record further in this proceeding in two ways:
 - require Xcel to track the effects of the recently approved service disconnection, payment arrangements and various customer protections and assistance, the effects of those changes on Xcel's bad debt expense and to provide that information to the Commission in a compliance filing containing one year of actual data.
 - extend those same reporting requirements to CenterPoint.
 - A.3. For the state's other regulated utilities (except CenterPoint), the Department recommends the Commission require a compliance filing that addresses the administration of their service disconnection and complaint resolution efforts.
- B. SHOULD UTILITIES BE REQUIRED TO DEVELOP DISCONNECTION AND PAYMENT ARRANGEMENT POLICIES AND MAKE THEM PUBLIC? ONCE THE POLICIES ARE DEVELOPED, SHOULD THERE BE ANY OTHER MODIFICATIONS MADE TO THEM?*
- B.1. The Department recommends the Commission extend CUB/LSAP's second recommendation only if an analysis of each utility's disconnection, payment arrangement policies and practices demonstrate it has not managed its disconnection and complaint processes competently for the same reasons listed in the Department's response to the previous question.
- C. RESPONSE TO NOTICE TOPICS*
- C.1. The Department has no recommendations for this topic.
 - C.2. The Department recommends that Commission can remedy unsatisfactory performance via a quality-of-service plan that includes financial penalties (disincentives) like that approved for Xcel.
 - C.3. The Department recommends if the Commission wants the utilities other than Xcel to provide equity-related information that the Commission:
 - require those regulated utilities to provide the following information:
 - Customers Experiencing Lengthy Interruptions of 12 hours or more (CELI-12);
 - Customers Experiencing Multiple Interruptions of six or more (CWMI-6);
 - Disconnections;
 - CIP Low Income Program participation; and,

- Customers Participating in Low Income Energy Affordability Program Participation (LI EAP).²⁴

Or the Department recommends the Commission ask the utilities other than Xcel, to provide comments on the relative difficulty of gathering the information listed above and performing the linear regression analysis needed and to provide that information in a compliance filing.

- C.4. The Department requests utilities other than MERC, and Xcel provide this information in supplemental comments. The Department will review that information and provide its recommendation in supplemental comments.
- C.5. The Department has no recommendation for this topic.
- C.6. The Department requests utilities affected utilities provide this information in supplemental comments. The Department will review that information and provide its recommendation in supplemental comments.
- C.7. The Department recommends the Commission require DEA, Greater Minnesota Gas and Otter Tail Power provide a response to this topic.
- C.8. The Department has no recommendation for this topic.

²⁴ This recommendation assumes Commission Staff would be responsible for the linear regression analyses that would be needed to be completed.

CERTIFICATE OF SERVICE

I, Nicole Westling, 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. E,G-999/PR-25-2

Dated this **15th** day of **May 2025**

/s/Nicole Westling

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	PR-25-2
2	Ryan	Baumtrog	ryan.baumtrog@state.mn.us		Minnesota Dept of Housing	400 Wabasha St N Ste 400 St. Paul MN, 55102 United States	Electronic Service		No	PR-25-2
3	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	PR-25-2
4	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	PR-25-2
5	Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 St. Paul MN, 55101 United States	Electronic Service		No	PR-25-2
6	Beverly	Dahlberg	bevdahlberg@nweco.com	Northwestern Wisconsin Electric Co.		104 South Pine Street P O Box 9 Grantsburg WI, 54840-0009 United States	Electronic Service		No	PR-25-2
7	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	PR-25-2
8	Ron	Elwood	relwood@mnlsap.org	Legal Services Advocacy Project		970 Raymond Avenue Suite G-40 Saint Paul MN, 55114 United States	Electronic Service		No	PR-25-2
9	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	PR-25-2
10	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	PR-25-2
11	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	PR-25-2

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
12	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	PR-25-2
13	Jack	Kegel	jkegel@mmua.org	MMUA		3025 Harbor Lane N Suite 400 Plymouth MN, 55447-5142 United States	Electronic Service		No	PR-25-2
14	Collin	Kremeier	ckremeier@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	PR-25-2
15	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	PR-25-2
16	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	PR-25-2
17	Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	PR-25-2
18	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	PR-25-2
19	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	PR-25-2
20	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	PR-25-2
21	Jodi	Schinzling	jodischinzling@nweco.com	Northwestern Wisconsin Electric Company		104 S. Pine Street Grantsburg WI, 54840 United States	Electronic Service		No	PR-25-2
22	Lori	Schultz	lorischultz@minncap.org	Minnesota Community Action Partnership		MCIT Building 100 Empire Dr Ste 202 St. Paul MN, 55103 United States	Electronic Service		No	PR-25-2
23	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993	Electronic Service		No	PR-25-2

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
24	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	PR-25-2
25	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	PR-25-2
26	Katherine	Teiken	katherine.teiken@state.mn.us			400 Wabasha St N Suite 400 Saint Paul MN, 55102 United States	Electronic Service		No	PR-25-2