

March 21, 2024

Will Seuffert
Executive Secretary
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-002/M-21-695

Dear Mr. Seuffert:

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

Xcel Energy's Tariff Revisions Updating Community Solar Garden Tariff Providing Additional Customer Protections in Subscription Eligibility

After review of the additional comments from Mid-Minnesota Legal Aid, the Citizens Utility Board of Minnesota, and the Energy CENTS Coalition, The Department recommends adopting the modifications proposed by the Energy Cents Coalition, with additional modifications, and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Louise Miltich
Assistant Commissioner of Energy Regulatory Affairs

LM/ar
Attachment

Comments of the Minnesota Department of Commerce

Docket No. E-002/M-21-695

I. INTRODUCTION

On February 9, 2024, the Commission opened for comment Xcel Energy's (Xcel) January 16, 2024 compliance filing.¹ The Commission invited comments on the following questions:

- Does Xcel Energy's January 16, 2024 compliance filing meet the requirements of Point 3 of the Commission's August 11, 2023 Order?
- Are there other issues or concerns related to this matter?

Comments were submitted by the following parties:

- Mid-Minnesota Legal Aid and Legal Services Advocacy Project (MMLA)²
- The Minnesota Department of Commerce (Commerce or Department)³
- Citizens Utility Board of Minnesota (CUB)⁴
- Energy CENTS Coalition (ECC)⁵

The Department submits these reply comments in response to the commenters listed above. The Department recommends that the Commission adopt the proposed modifications made by ECC, with an additional modification.

II. PROCEDURAL HISTORY

A. SUMMARY OF COMMENTS

1. Energy CENTS Coalition

The Energy CENTS Coalition (ECC) filed comments on March 8, 2024 which recommend approval of Xcel's January 16, 2024 compliance filing, with modifications to the tariff and landlord addendum.⁶

¹ Minnesota Public Utilities Commission, Notice of Comment Period, (February 9, 2024) (eDocket [20242-203262-01](#))

² Mid-Minnesota Legal Aid and Legal Service Advocacy Project, Reply Comments (March 8, 2024) Docket No. E-002/M-21-695 (eDocket [20243-204185-02](#))

³ Minnesota Department of Commerce, Reply Comments (March 8, 2024) Docket No. E-002/M/21/695 (eDocket [20243-204181-01](#))

⁴ Citizens Utility Board, Reply Comments (March 8, 2024) Docket No. E-002/M-21-695 (eDocket [20243-204179-01](#))

⁵ Energy CENTS Coalition, Reply Comments (March 8, 2024) Docket No. E-002/M-21-695 (eDocket [20243-204177-01](#))

⁶ Energy CENTS Coalition, Reply Comments (March 8, 2024) Docket No. E-002/M-21-695, at 8 (eDocket [20243-204177-01](#))

ECC proposes several modifications which aim to resolve its concerns with the current *In Care Of*(ICO) billing as proposed by Xcel. These changes include a tariff change, additional requirements on landlords, makes several changes to the landlord addendum Opt-In Form, and includes an addendum to the ICO billing form, requiring information of the property owner, billing agent, tenant, and Xcel account.

2. *Citizens Utility Board*

The Citizen’s Utility Board of Minnesota (CUB) filed comments on March 8, 2024 which recommend approval of Xcel’s January 16, 2024 compliance filing, with modifications.⁷

CUB noted concerns with the petition, in its current state, but appears likely to support the modifications proposed by ECC. CUB states that some concerns will remain but recommends approval if the Commission revises Xcel’s tariffs to ensure landlords, re-billers, and tenants understand that consumer protections are maintained. CUB notes that the inclusion of PowerON budget billing amounts on Xcel bills benefits all PowerON participants, not only those who have a Community Solar Garden (CSG) subscription.

3. *Mid-Minnesota Legal Aid*

Mid-Minnesota Legal Aid (MMLA) does not support the approval of Xcel Energy's January 16 Compliance Filing and states, “there are significant unresolved consumer protection problems”.⁸

MMLA cites concerns that low-income tenants will not have access to assistance benefits and that billing practices in the proposed model lack transparency and oversight. MMLA’s filing requests that tenants be returned to direct-paying customers of the regulated provider and that the Commission re-examine whether landlord or other third-party billing or re-billing should remain a part of the CSG model.

III. ANALYSIS

1. *Energy CENTS Coalition*

ECC’s support of approval is conditioned upon the Commission adopting its proposed modifications to the landlord addendum and tariff. ECC proposes requirements on landlords to furnish completed ICO billing forms immediately to Xcel and ensure that customers who do not have internet access receive a physical copy of their monthly bill. ECC’s proposed changes to the landlord addendum Opt-In Form ensure customers retain consumer protections and benefit eligibility. It also requires that the In-Care-Of billing form include information of the property owner, billing agent, tenant, and Xcel account.

ECC’s filing raised several concerns regarding the proposed ICO billing. ECC believes ICO billing, as proposed, does not adequately protect low-income tenants who live in CSG-subscribed buildings and

⁷ Citizens Utility Board, Reply Comments (March 8, 2024) Docket No. E-002/M-21-695, at 7 (eDocket [20243-204179-01](#))

⁸ Mid-Minnesota Legal Aid and Legal Service Advocacy Project, Reply Comments (March 8, 2024) Docket No. E-002/M-21-695, at 3 (eDocket [20243-204185-02](#))

states that complications are likely to arise from the proposed ICO billing option. Specifically, ECC states the ICO billing option:

- i. Does not ensure customers (tenants) are notified that they remain Xcel customers. The proposal does not ensure they will receive a physical bill which could harm customers who are unaware they are eligible for assistance.⁹
- ii. Leads to potential complications if tenants use a re-billed statement to apply for benefits or assume they are ineligible. Applications for LIHEAP must use statements from Xcel but, because some third-party billers are also approved LIHEAP vendors, some payments could go to the billing agent. Tenants may not have the proper paper bills to submit and therefore, could lose access to LIHEAP.¹⁰
- iii. Does not ensure Cold Weather Rule (CWR) protections. Because CWR payment plans are negotiated by phone and not reflected on bills, a re-biller would not have knowledge of a CWR payment arrangement and may bill customers the full amount instead of the negotiated amount.¹¹
- iv. Relies on customers having reliable access to internet service. ECC notes that it receives over 50 applications per week via fax and states that it is not safe to assume customers have internet access.¹²

ECC supports portions of Xcel's proposal, including the proposal to include the PowerON affordability payment amount on customer bills. ECC believes the inclusion of this payment amount benefit CSG subscribers and non-subscribers alike by reducing confusion and decreasing inquiries to ECC regarding payment amounts. ECC speculates that this change will increase retention rates. Landlords whose tenants have a PowerON payment plan will see the payment amounts and re-bill accordingly. The ECC notes a potential issue for the PowerON program regarding participants who miss payments. Currently, Xcel is required to report missed payments to PowerON and remove participants who miss two consecutive payments. Through a re-biller, Xcel will not know if tenants have made payments. ECC noted that no complaints were received about tenants losing access to affordability programs as a result of landlords removing them from Xcel accounts since the roll-out of ICO billing.¹³ ECC states that the benefits outweigh the drawbacks in this example and supports approval, with its proposed modifications.¹⁴

⁹ Energy CENTS Coalition, Reply Comments (March 8, 2024) Docket No. E-002/M-21-695, at 5 (eDocket [20243-204177-01](#))

¹⁰ [Ibid](#), at 5

¹¹ [Ibid](#), at 6

¹² [Ibid](#), at 6

¹³ [Ibid](#), at 8

¹⁴ [Ibid](#), at 8

2. *Citizens Utility Board*

CUB's filing expresses support for ICO billing, with modifications and highlights its concerns with the Building Subscription Model (BSM). CUB states that the current BSM option removes bills from tenant's names, removes eligibility for assistance programs, eliminates CWR and medical protections, makes past due amounts immediately due, and only grants tenants online-access to their bills.¹⁵

CUB states that a landlord can only enter a CSG subscription if they comply with the Landlord Addendum, but the Addendum requires tenants to opt-in to the CSG ICO billing option, which is a circular requirement. CUB states, "a tenant who opts-in to the Building Subscription Model loses the consumer protections the In Care of Billing proposal is designed to help them retain."¹⁶

CUB notes that ICO billing, as proposed, would not fix problems with CWR payment plans. As CWR payment plans are negotiated with Xcel and not reflected on a bill, the physical bill Xcel would issue to landlords or third-party billers would not show the negotiated amount and, therefore, landlords or third-party billers may bill tenants the full amount due instead of the negotiated amount. CUB also has concerns about internet access, particularly for low-income customers. CUB states that tenants who do not have access to their bill will face problems applying for benefits or may be unaware of their own eligibility. Even customers with internet access to Xcel's online portal may have issues accessing their accounts because it is unclear if the online account requires the information of the tenant, the landlord, or the third-party biller.

3. *Mid-Minnesota Legal Aid*

MMLA's filing opposes ICO billing and recommends the Commission reject the proposal. MMLA points to concerns that tenants who subscribe to a CSG have had issues accessing PowerON, Medical Affordability, Gas Affordability, and Low-Income Discount programs.¹⁷ MMLA is concerned that ICO billing eliminates a series of consumer protections, limits customer access to benefit programs, and presents issues regarding Low-Income Home Energy Assistance Program (LIHEAP) and Crisis benefits.

MMLA states that customer and housing-related issues arising from non-provider utility billing have not been satisfactorily addressed. MMLA describes lawsuits brought against landlords stemming from billing issues for utilities. The allegations of these suits include landlords overcharging tenants for utility services, landlords failing to notify tenants of billing information as required by statute, landlords illegally terminating electricity service to tenants, and evictions.¹⁸

MMLA cites the lack of access to LIHEAP and Crisis benefits, and the failure of stakeholders to identify a solution to the issues raised by tenants at the May 5, 2022 hearing as reasons that it does not support approval of either the Compliance Filing or the CSG model. MMLA states that, through the proposed ICO Billing method, a potential beneficiary of LIHEAP who pays a third-party biller could see their

¹⁵ Citizens Utility Board, Reply Comments (March 8, 2024) Docket No. E-002/M-21-695, at 5 (eDocket [20243-204179-01](#))

¹⁶ *Ibid*, at 5

¹⁷ Mid-Minnesota Legal Aid and Legal Service Advocacy Project, Reply Comments (March 8, 2024) Docket No. E-002/M-21-695, at 3 (eDocket [20243-204185-02](#))

¹⁸ *Ibid*, at 5, 6

assistance benefit significantly reduced or even eliminated. These customers would also become ineligible for crisis funds. MMLA calculated that some customers who would have been eligible for hundreds of dollars in assistance benefits, instead received a monthly solar credit of only \$2.70-\$3.70.¹⁹

MMLA believes the CSG Model should be Re-Examined and Re-Assessed to determine whether this delivery and billing approach for solar energy is in the public interest. MMLA acknowledges it is beyond the scope of the docket, but believes non-provider billing is a problem that negatively impacts low-income customers. MMLA's objection does not suggest modifications to the proposal or reference the tariff and addendum changes proposed by ECC.

4. *Reply of the Department of Commerce*

The Department of Commerce believes that maintaining consumer protections and energy-related assistance benefits for eligible customers should be a top priority when evaluating the proposed changes to CSG re-billing. In its current state, the proposal would eliminate CWR protections, protections for customers who use medical equipment, and benefit-eligibility for low-income customers. To maintain protections and benefit eligibility, further modifications to Xcel's proposal are necessary.

While the Department is pleased to work collaboratively with interested parties to find a solution that best serves the public interest, it is cautious of unintended consequences additional modifications to Xcel's billing model may have. The modifications proposed by ECC place an additional burden on landlords, CSG operators, and tenants who may be satisfied with the current building-subscription model.

The Department supports the modifications which maintain consumer protections and energy-related benefit eligibility as proposed by ECC. The Department proposes an additional modification to ECC's proposal, entitling any customer to a physical copy of their Xcel bill, at no charge, within five business days of request. The Department believes that consumer protections and eligibility for assistance benefits retained through ECC's proposal outweigh the burden the proposal may place upon other parties.

IV. CONCLUSION

The Department would like to thank the Energy CENTS Coalition, the Citizens Utility Board, and Mid-Minnesota Legal Aid for their comments regarding this issue and acknowledge their dedication to protecting Minnesota residents. The importance of consumer protections and eligibility for assistance benefits cannot be overstated. The Department believes that retaining consumer protections and benefits, as proposed through ECC's modifications, outweigh the potential burden ECC's proposal may place upon other parties.

¹⁹ [Ibid](#), at 4

In light of the comments and concerns raised by each of these organizations regarding Xcel's current proposal, the Department recommends that the Commission adopt the modifications as proposed by ECC, with an additional modification to Attachment A, the landlord addendum, which will ensure tenants have access to physical copies of monthly Xcel bills.

ATTACHMENT A

Landlord Addendum

2. Opt-In.

The “Opt-In” provisions apply to all Subscriptions entered into on or after October 1, 2023, where the Landlord has a Subscription associated with a premise with its own meter occupied by a tenant, and for any pre-existing Subscription associated with a premise where a new tenant on or after October 1, 2023, occupies the premise.

Where the Landlord seeks to have a new Subscription associated with a tenant occupied premise or seeks to continue a Subscription where there is a new tenant, the Landlord can only do so after the tenant has voluntarily signed the Opt-In Consent Form set forth in Attachment A to this Addendum and the In Care of Billing Form set forth in Attachment B to this Addendum. The signed Opt-In Consent Form must be made available to the Company from the Community Solar Garden Operator upon request. The Landlord must provide the In Care of Billing Form to the Company immediately after the Form is signed by a tenant. On the In Care of Billing Form, the Landlord must include the tenant Xcel Energy Account number and any other information required for the tenant to access their Xcel Energy account online. If the tenant **requests hard copies of their monthly bill or** does not have internet access, the Landlord must provide the tenant with a hard copy of their monthly Xcel Energy bill **within five (5) business days, at no cost to the tenant.**

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. E002/M-21-695

Dated this **21st** day of **March 2024**

/s/Sharon Ferguson

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