



Minnesota Energy Resources Corporation
2685 145th Street West
Rosemount, MN 55068
www.minnesotaenergyresources.com

March 31, 2025

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101

VIA ELECTRONIC FILING

**Re: Minnesota Energy Resources Corporation's Gas Affordability Program
2024 Annual Report**

Docket No. G011/M-25-39

Dear Mr. Seuffert:

Enclosed for filing, please find Minnesota Energy Resources Corporation's ("MERC's" or the "Company's") Gas Affordability Program ("GAP") 2024 Annual Report. MERC submits this report pursuant to the Company's Gas Affordability Program, MERC Tariff Sheet Nos. 7.09-7.11, and the Minnesota Public Utilities Commission's ("Commission's") Orders in Docket Nos. G011/M-07-1131, G011/M-15-308, G011/M-15-539, G011/M-19-369, G011/M-22-154, G011/M-22-248, G011/M-23-85, and G011/M-24-39. In accordance with the Commission's November 26, 2014, Order Accepting Gas Affordability Program Annual Reports, MERC submits this filing as a new miscellaneous filing in compliance with the Commission's Rules of Practice and Procedure. In accordance with the Commission's August 14, 2023 Order in Docket No. G011/M-24-39, MERC is proposing an automatic GAP enrollment program, with tariff changes reflected in Attachment D.

A copy of this miscellaneous filing has been served on the Office of the Attorney General – Residential Utilities Division and the Department of Commerce, Division of Energy Resources. The information required by Minnesota Rule 7829.1300 is also included with this filing. Excel versions of Attachments A, B, and C are being filed concurrently.

Please feel free to contact me at (414) 221-4208 or joylyn.hoffmanmalueg@wecenergygroup.com if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Joylyn C. Hoffman Malueg".

Joylyn Hoffman Malueg
Senior Project Specialist
Minnesota Energy Resources Corporation

Enclosures
cc: Service List

**STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

**Katie J. Sieben
Hwikwon Ham
Audrey C. Partridge
Joseph K. Sullivan
John A. Tuma**

**Chair
Commissioner
Commissioner
Commissioner
Commissioner**

Minnesota Energy Resources Corporation's
2024 Gas Affordability Program Annual
Report

Docket No. G011/M-25-39

**MINNESOTA ENERGY RESOURCES CORPORATION'S GAS AFFORDABILITY PROGRAM
2024 ANNUAL REPORT**

Pursuant to Minnesota Rules part 7829.1300, Minnesota Energy Resources Corporation ("MERC" or the "Company") submits this miscellaneous filing to the Minnesota Public Utilities Commission ("Commission") for approval of MERC's Gas Affordability Program ("GAP") 2024 Annual Report.

I. Summary of Filing

Pursuant to Minn. R. 7829.1300, subp. 1, a one-paragraph summary of the filing is attached.

II. Service

Pursuant to Minn. R. 7829.1300, subp. 2, MERC has served a copy of this petition on the Department of Commerce, Division of Energy Resources ("Department") and the Office of the Attorney General – Residential Utilities Division ("OAG"). The summary of the filing has been served on all parties on the attached service list.

III. General Filing Information

Pursuant to Minn. R. 7829.1300, subp. 3, the following information is provided:

A. Name, Address, and Telephone Number of the Filing Party

Minnesota Energy Resources Corporation
2685 145th Street West
Rosemount, MN 55068
(651) 322-8901

B. Name, Address, Electronic Address, and Telephone Number of Attorney for the Utility

Kristin M. Stastny
Taft Stettinius & Hollister LLP
2200 IDS Center
80 South Eighth Street
Minneapolis, MN 55402
KStastny@Taftlaw.com
(612) 977-8656

C. Date of the Filing and Proposed Effective Date

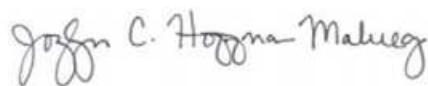
Date of Filing: March 31, 2025

Proposed Effective Date: In accordance with the Commission's August 14, 2023 Order in Docket No. G011/M-24-39, MERC is proposing an automatic GAP enrollment program, with tariff changes reflected in Attachment D, which the Company proposes to implement beginning in the summer of 2026, assuming Commission approval of the automatic enrollment program as proposed.¹

D. Statute Controlling Schedule for Processing the Filing

Under Minn. R. 7829.0100, subp. 11, this petition is a "miscellaneous" filing because no determination of MERC's general revenue requirement is necessary. Comments on a miscellaneous filing are due within 30 days of filing, with replies due 10 days thereafter.²

E. Signature, Electronic Address, and Title of Utility Employee Responsible for the Filing



Joylyn C Hoffman Malueg
Senior Project Specialist
joylyn.hoffmanmalueg@wecenergygroup.com
231 W. Michigan Street
Public Service Building – P418

¹ MERC anticipates needing approximately six months to implement system configuration changes to allow for the implementation of automatic enrollment based on the details proposed in this filing and has proposed this timeline based on an anticipated Commission decision in the fall of 2025. If the Commission approves modifications from what MERC is proposing, additional time may be required to implement the automatic enrollment program. As described in this filing, MERC proposes to begin automatically enrolling customers in July 2026 based on LIHEAP customer data (income and gas bills) as of May 2026.

² Minn. R. 7829.1400, subp. 1, 4.

Milwaukee, WI 53203
(414) 221-4208

F. Description of the Filing, Impact on Rates and Services, and Reasons for the Filing

MERC submits this 2024 Annual Report in compliance with the Company's approved GAP (MERC Tariff Sheet Nos. 7.09 to 7.11) and the Commission's prior orders.³ This filing includes the following:

- A one-paragraph summary of the filing in accordance with Minn. R. 7829.1300, subp. 1;
- 2024 GAP Annual Report;
- Attachment A—2024 GAP Tracker;
- Attachment B—2020-2024 GAP Streamlined Reporting Form;
- Attachment C—Estimated Savings From Avoided Write-Offs;
- Attachment D—Proposed Redline and Clean GAP Tariff Sheets; and
- Attachment E—Estimated Annual Costs for GAP Automatic Enrollment.

On September 28, 2018, the Commission issued an Order Accepting Report and Adopting Streamlined Process in Docket Nos. G008/M-16-486, G002/M-16-493, and G004/M-16-495, accepting the Utility Stakeholder Report and adopting the streamlined reporting format for Xcel Energy, CenterPoint Energy, and Great Plains Natural Gas Company. In its 2018 GAP annual report filed in Docket No. G011/M-19-241, MERC filed data on the approved streamlined reporting format. In Docket No. G011/M-19-369, MERC committed in future annual reports to continue to track and report based on the metrics outlined in the Commission-approved streamlined reporting form as developed by the Department and approved by the Commission. On January 18, 2023, the Commission issued an Order in Docket No. G011/M-22-248

³ Specifically, this report addresses requirements from the Commission's February 27, 2008, November 18, 2009, September 22, 2010, September 15, 2013, and November 26, 2014, orders in Docket No. G011/M-07-1131; September 29, 2015 Order Accepting Gas Affordability Program Reports, Requesting Additional Information, and Finding that Greater Minnesota Gas Failed to Comply with the Commission's November 26, 2014 Order in Docket No. G011/M-15-308; September 25, 2015, Order in Docket No. G011/M-15-539; January 17, 2020, Order Approving Periodic Gas Affordability Program Evaluation Reports and Other Action in Docket No. G011/M-19-369; September 15, 2021, Order Accepting Reports, Approving Program Modifications, and Setting Additional Reporting Requirements; August 8, 2022, Order Accepting 2021 GAP Reports, Approving Surcharge Modifications, and Setting Additional Requirements in Docket No. G011/M-22-154; January 18, 2023, Order in Docket No. G011/M-22-248; September 7, 2023 Order Accepting Reports and Setting Additional Requirements in Docket No. G011/M-23-85; and August 14, 2024 Order in Docket No. G011/M-24-39.

discontinuing the three-year GAP evaluation reports and instead requiring five years of historical data in each GAP annual report, to be submitted in spreadsheet format. Attachment B, which is also being filed in excel format, provides five years of historical data using the streamlined form in accordance with the Commission's Order.

On August 14, 2024, the Commission issued an Order in Docket No. G011/M-24-39, requiring MERC to propose an automatic enrollment program in its 2025 GAP Report, including specific information, which the Company addresses in this filing. Included in Attachment D are redlined and clean GAP tariff sheets incorporating modifications to implement the Company's proposed automatic enrollment program. MERC proposes to implement these tariff changes after the Commission approves the proposed automatic enrollment program, as discussed in this filing.

IV. Miscellaneous Information

Pursuant to Minnesota Rule 7829.0700, MERC requests that the following persons be placed on the Commission's official service list for this matter:

Joylyn C Hoffman Malueg
Senior Project Specialist
Minnesota Energy Resources Corporation
231 W. Michigan Street
Public Service Building – P418
Milwaukee, WI 53203
Telephone: (414) 221-4208
joylyn.hoffmanmalueg@wecenergygroup.com

Kristin M. Stastny
Taft Stettinius & Hollister LLP
2200 IDS Center
80 South 8th Street
Minneapolis, MN 55402
Telephone: (612) 977-8656
KStastny@Taftlaw.com

V. Conclusion

Based on the foregoing and the information contained in the attached 2024 GAP Annual Report, MERC respectfully requests that the Commission accept MERC's Annual Report as compliant with MERC's GAP tariff and Commission orders and approve the Company's proposed automatic enrollment program and associated tariff modifications as reflected in Attachment D.

If additional information is required, please contact Joylyn Hoffman Malueg at (414) 221-4208 or Kristin Stastny at (612) 977-8656.

DATED: March 31, 2025

Respectfully submitted,

TAFT STETTINIUS & HOLLISTER LLP

/s/ Kristin M. Stastny

Kristin M. Stastny
2200 IDS Center
80 South 8th Street
Minneapolis, MN 55402
Telephone: (612) 977-8656
KStastny@Taftlaw.com

Attorney for Minnesota Energy Resources
Corporation

**STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

**Katie J. Sieben
Hwikwon Ham
Audrey C. Partridge
Joseph K. Sullivan
John A. Tuma**

**Chair
Commissioner
Commissioner
Commissioner
Commissioner**

Minnesota Energy Resources Corporation's
2024 Gas Affordability Program Annual
Report

Docket No. G011/M-25-39

SUMMARY OF FILING

Please take notice that on March 31, 2025, Minnesota Energy Resources Corporation filed with the Minnesota Public Utilities Commission a Petition for approval of its 2024 Gas Affordability Program Annual Report and proposed GAP automatic enrollment program pursuant to Minnesota Rules part 7829.1300.

**STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

**Katie J. Sieben
Hwikwon Ham
Audrey C. Partridge
Joseph K. Sullivan
John A. Tuma**

**Chair
Commissioner
Commissioner
Commissioner
Commissioner**

Minnesota Energy Resources Corporation's
2024 Gas Affordability Program Annual
Report

Docket No. G011/M-25-39

**MINNESOTA ENERGY RESOURCES CORPORATION'S 2024 GAS AFFORDABILITY
PROGRAM ANNUAL REPORT**

A. INTRODUCTION AND OVERVIEW

Minnesota Energy Resources Corporation ("MERC" or the "Company") submits this Annual Report in compliance with the Company's Gas Affordability Program ("GAP" or the "Program") Tariffs (MERC Tariff Sheet Nos. 7.09 to 7.11) and the Minnesota Public Utilities Commission's (the "Commission's") prior orders.¹ These orders required MERC to continue its GAP with no expiration date, making the Program permanent²; required continued annual Program reports to be submitted by March 31 with additional reporting requirements; and discontinued the GAP three-year evaluation reports and instead required five years of historical

¹ This report addresses requirements from the Commission's February 27, 2008, November 18, 2009, September 22, 2010, September 15, 2013, and November 26, 2014, orders in Docket No. G011/M-07-1131; September 29, 2015 Order Accepting Gas Affordability Program Reports, Requesting Additional Information, and Finding that Greater Minnesota Gas Failed to Comply with the Commission's November 26, 2014 Order in Docket No. G011/M-15-308; September 25, 2015, Order in Docket No. G011/M-15-539; January 17, 2020, Order Approving Periodic Gas Affordability Program Evaluation Reports and Other Action in Docket No. G011/M-19-369; September 15, 2021, Order Accepting Reports, Approving Program Modifications, and Setting Additional Reporting Requirements; August 8, 2022, Order Accepting 2021 GAP Reports, Approving Surcharge Modifications, and Setting Additional Requirements in Docket No. G011/M-22-154; January 18, 2023, Order in Docket No. G011/M-22-248; September 7, 2023 Order Accepting Reports and Setting Additional Requirements in Docket No. G011/M-23-85; and August 14, 2024 Order in Docket No. G011/M-24-39, as applicable.

² MERC's GAP became effective on April 1, 2008, and the initial four-year program term ended on December 31, 2011. The Commission authorized MERC to continue its pilot in its December 29, 2011 Order in Docket No. G007,011/M-07-1131, and its September 25, 2015 Order in Docket No. G011/M-15-539. The Commission ordered MERC to continue its GAP and make the Program permanent in its January 17, 2020 Order in Docket No. G011/M-19-369.

data in each GAP annual report, with GAP annual reports submitted using the streamlined reporting format.

This Annual Report covers the 2024 program year. In compliance with the Commission's January 18, 2023 Order in Docket No. G011/M-22-248, MERC is providing five years of historical data in Attachment B, which is submitted in Microsoft Excel spreadsheet format. The remainder of this GAP Annual Report is structured as follows:

- B. Program Description – Eligibility, Affordability, and Arrearage Forgiveness
- C. Program Benefits and Evaluation – Evaluation under Minn. Stat. § 216B.16, subd. 15
- D. Program Cost and Cost Recovery
- E. Participation, Retention, and Promotion
- F. Complaints
- G. GAP Summary Information³
- H. Proposed Automatic Enrollment

Attachment A: 2024 GAP Tracker

Attachment B: 2020-2024 GAP Streamlined Reporting

Attachment C: Estimated Savings from Avoided Write-Offs

Attachment D: Proposed Clean and Redline GAP Tariff Sheets

Attachment E: Estimated Annual Costs for GAP Automatic Enrollment

Consistent with MERC's commitment in Docket No. G011/M-19-369, MERC is reporting using the pre-program baseline method for disconnection rates, payment frequency, and arrears, in accordance with the Commission's streamlined reporting form approved in Docket Nos. G008/M-16-486, G002/M-16-493, and G004/M-16-495. MERC collects data in these areas on the pre-program baseline for its GAP participant cohort and GAP participant cohort

³ Section G includes the information required by the Commission in its September 25, 2013 Order Accepting Gas Affordability Program Reports in Docket No. G011/M-07-1131.

before they were enrolled in GAP. As addressed in Docket No. G011/M-19-369, MERC defines its GAP participant cohort as new GAP enrollees during the relevant reporting year;⁴ here, all GAP participants who enrolled during 2024. This information is reported in Attachment B to this Annual Report. In accordance with the Commission's January 18, 2023 Order in Docket No. G011/M-22-248, MERC is providing five years of historical data in this 2024 GAP annual report in Attachment B in spreadsheet format.⁵

Section H below addresses the Commission's August 14, 2024, Order in Docket No. G011/M-24-39, requiring MERC to propose an automatic enrollment program in its 2025 GAP Report, including specific information. MERC developed its proposed automatic enrollment program based on the GAP automatic enrollment programs approved for CenterPoint Energy and Xcel Energy, with the details proposed outlined in Section H. In Attachment D, MERC provides redlined and clean GAP tariff sheets incorporating language modifications to implement the Company's proposed automatic enrollment program.

B. PROGRAM DESCRIPTION

MERC's GAP is designed to lower the percentage of income that low-income households devote to energy bills, to increase customer payments, and to reduce the costs associated with the collection of unpaid bills. The Program consists of two components designed to assist low-income households: (1) the affordability component, which consists of bill credits determined by calculating the difference between the estimate of the customer's annual natural gas bill and the applicable income limit of the customer's household income,⁶ and (2) the

⁴ *In the Matter of Minn. Energy Res. Corp's 2019 Evaluation of its Gas Affordability Program*, Docket No. G011/M-19-369, MERC Reply Comments at 7-8 (Nov. 1, 2019).

⁵ Order Point 16 of the Commission's January 18, 2023 Order in Docket No. G011/M-22-248 required the natural gas utilities to submit their compliance reports in spreadsheet format.

⁶ Specifically, MERC's affordability component consists of a bill credit determined as one-twelfth of the difference between the customer's actual annual gas bill from the prior year and three percent of the customer's actual annual household income as provided by the customer in their most recent LIHEAP application. This bill credit is a Program cost that is included in the tracker. Any energy assistance sums not applied to arrears will be applied to a qualified customer's current bill. MERC Tariff Sheet No. 7.09.

arrearage-forgiveness component, which provides a monthly credit to the customer's balance after payment is received to retire pre-program arrears.⁷

MERC's GAP is available to residential customers in MERC's service area who have been qualified and receive assistance from LIHEAP during the federal fiscal year. MERC will maintain service and suspend collection activities to qualified customers, regardless of arrears balances, if the customer stays current with the payment schedule and otherwise maintains eligibility.

MERC's GAP has been administered internally by the Company since March 24, 2023. Previously, MERC's GAP had been administered by The Salvation Army.

1. Eligibility

The Program is available to any residential customers in MERC's service area who have been qualified and received assistance from the LIHEAP Program during the federal fiscal year. The average annual income per participant in 2024 was \$7,289. This average income decreased from \$15,166.01 in 2023. The average monthly bill for all GAP participants was approximately \$63. This is lower than last year's monthly average of \$90.

Qualified customers must maintain an active account in the customer's name at the customer's permanent, primary residence. Qualified customers must also agree to notify MERC of any changes in address, income level, or household size, as such changes may result in removal from the Program. If a customer is removed from GAP, the customer will be subject to the Company's regular collection practices, including the possibility of disconnection.

⁷ MERC's arrearage-forgiveness consists of a monthly credit that will be applied each month after receipt of the qualified customer's payment. The credit is designed to retire pre-program arrears over a period of up to 24 months, with the Company matching the qualifying customer's contribution to retiring pre-program arrears. The credit is determined by taking the pre-program arrears divided by the number of months to retire the arrears divided by two and then subtracting any energy assistance sums received by the Company on behalf of the customer divided by the number of months remaining to retire the arrears divided by two. This arrearage-forgiveness credit is a Program cost that will be included in the tracker. MERC Tariff Sheet No. 7.09.

2. Affordability and Arrearage Forgiveness

As previously discussed, the Program has both an affordability component and an arrearage-forgiveness component. The affordability component is a bill credit determined as one-twelfth of the difference between the customer's actual annual gas bills from the prior year and three (3) percent of the customer's actual annual household income as provided by the customer in their most recent LIHEAP application.⁸ The average annual affordability benefit per GAP customer in 2024 was \$506.23.

The arrearage-forgiveness component is a matching credit for customers who enroll with arrears that is applied to the customer's account each month after receipt of the customer's scheduled arrears payment. In 2024, the average annual arrears forgiveness benefit for those customers receiving arrearage forgiveness through GAP was \$45.16. This monthly credit and customer monthly payment pays the pre-program arrears in 24 months or less. The credit is determined by taking the pre-program arrears divided by the number of months to retire the arrears divided by two and then subtracting any energy assistance sums received by the Company on behalf of the customer divided by the number of months remaining to retire the arrears divided by two.⁹ The average annual total benefit per GAP participant in 2024 was \$514.78. The affordability and arrearage-forgiveness credits are both Program costs that are included in the tracker in Attachment A. Table 1 below provides a summary of affordability and arrearage forgiveness credits over the past five years.

⁸ MERC Tariff Sheet No. 7.09, Section 2.1. In its September 15, 2021 Order Accepting Reports, Approving Program Modifications, and Setting Additional Reporting Requirements in Docket No. G011/M-21-224, the Commission required that MERC calculate GAP credits based on actual annual participant natural gas bills and on actual GAP customer annual household income.

⁹ MERC Tariff Sheet No. 7.09.

Table 1. 2020-2024 Affordability and Arrearage-Forgiveness Credits

	2020	2021	2022	2023	2024
Affordability Credits ¹⁰	\$577,783.53	\$658,778.59	\$339,196.32	\$753,738.56	\$943,617.06
Arrearage Forgiveness Credits	\$7,871.43	\$6,828.06	\$2,360.34	\$9,860.01	\$15,941.55
Total Credits	\$585,654.96	\$665,606.65	\$341,556.66	\$763,598.57	\$959,558.61
Arrearage Credits/ Total Credits	1.3%	1.0%	0.7%	1.3%	1.7%

C. PROGRAM BENEFITS AND EVALUATION

Minn. Stat. § 216B.16, subd. 15 provides:

(b) Any affordability program the commission orders a utility to implement 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.¹¹

The statute also states:

(c) In ordering affordability programs, the commission may require public utilities to file program evaluations that measure the effect of the affordability program on:

- (1) the percentage of income that participating households devote to energy bills;
- (2) service disconnections; and

¹⁰ In accordance with the Commission's September 15, 2021 Order Accepting Reports, Approving Program Modifications, and Setting Additional Reporting Requirements in Docket No. G011/M-21-224, MERC reduced its affordability threshold to three (3) percent beginning in October 2021.

¹¹ Minn. Stat. § 216B.16, subd. 15(b).

(3) frequency of customer payments, utility collection costs, arrearages, and bad debt.¹²

MERC addresses these criteria below.

1. Lower the percentage of income that participating low-income households devote to energy bills

By design, MERC's GAP reduces participants' natural gas bills from what their bill would have been without the Program.¹³ The amount of this reduction is equal to the total monthly affordability and arrearage forgiveness credits provided. For this reason, the Program reduced the amounts billed for natural gas service to participating customers. As described in the Company's 2019-2021 GAP evaluation report in Docket No. G011/M-22-248, in late 2021 MERC reduced the GAP affordability threshold from six percent to three percent and implemented an annual recertification to set GAP credits based on updated annual participant natural gas bills and updated GAP customer annual household income in accordance with the Commission's September 15, 2021 Order Accepting Reports, Approving Program Modifications, and Setting Additional Reporting Requirements in Docket No. G011/M-21-224.

2. Decrease or eliminate participating customer arrears

The arrears-forgiveness component is also important to meeting the requirement to decrease or eliminate participating customers' arrears. Arrearage forgiveness provides an opportunity for participating customers to make an affordable payment to pay down their arrears.

At the end of 2024, the average arrears balance for GAP customers with arrears was \$99.63. The percentage of the enrolled GAP customers who were in arrears was seven (7) percent. This is lower than the non-GAP LIHEAP customers at 29 percent and non-LIHEAP residential customers at 17 percent. Table 2 below shows the average annual and monthly bill

¹² Minn. Stat. § 216B.16, subd. 15(c).

¹³ Changes in usage due to conservation or weather-related demand and changes in the price of natural gas also contribute to changes in the total amount of natural gas bills to participants.

credit amounts for GAP participants and a comparison of these amounts to GAP participants' annual and average monthly bill and account balance. The data in Table 2 below includes all GAP customers, regardless of arrears or credit balance. In particular, the average arrearage (account balance) includes account balances for those customers who have participated in the Program for more than two years and who successfully eliminated their pre-Program arrears and may have a significant credit balance. There were approximately 498 customers enrolled at the end of 2024 with credit balances greater than \$500.

Table 2. GAP Credits, Bills, and Arrears

Year	Average Annual Affordability Credit	Average Monthly Affordability Credit	Average Annual Bill	Average Monthly Bill	Average Arrearage (Account Balance)
2024	\$506.23	\$42.19	\$750.85	\$62.57	-\$444.09
2023	\$439.75	\$36.65	\$1,074.33	\$89.53	-\$351.48
2022	\$280.79	\$23.40	\$1,186.14	\$98.85	-\$392.40
2021	\$556.87	\$46.41	\$775.05	\$64.59	-\$480.78
2020	\$443.09	\$36.92	\$655.16	\$54.60	-\$1,050.00

At the end of 2024, MERC's GAP customers accounted for less than one (1) percent of the total company Residential arrears compared to non-GAP LIHEAP customers at approximately 12 percent and non-LIHEAP residential customers at approximately 88 percent.

3. Lower the costs associated with collections

In 2024, MERC enrolled 112 customers with arrears. While enrolled in the Program and continuing to make required monthly payments, these customers were exempt from continued collection activities, including disconnection of service. The Program continued to succeed in reducing and eliminating arrears of Program participants in 2024, promoting regular affordable monthly payments.

MERC's GAP tariff states, in part:

The financial evaluation will include a discounted cash flow of the Program's cost-effectiveness analysis from a ratepayer perspective comparing the 1) total Program costs, which includes the Affordability component, Arrearage Forgiveness component and total company incurred administration costs, to 2) the total net savings including cost reductions on utility functions such as the impact of the Program on write-offs, service disconnections and reconnections and collections activities. The discounted cash flow difference between total Program costs and total net savings will result in either a net benefit or a net cost to ratepayers for the Program.

Pursuant to this provision, the Company provides the following cost-effectiveness analysis from a ratepayer perspective for the period 2020-2024. The calculation of savings from avoided write-offs, service disconnections and reconnections, and collections activities are summarized in Table 3 below.

Table 3. GAP Cost-Effectiveness

	2020	2021	2022	2023	2024
Program Costs¹⁴	\$629,009	\$704,867	\$363,602	\$767,924	\$959,559
Savings From Avoided Write-Offs	(\$351,456)	(\$354,970)	(\$48,560)	(\$775,122)	(\$974,310)
Savings From Avoided Disconnect, Reconnects, and Collections¹⁵	(\$2,480)	(\$620)	(\$7,595)	(\$11,935)	(\$14,940)
Cost/ (Benefit)	\$275,074	\$349,278	\$307,447	(\$19,133)	(\$29,691)

The Company considered Program costs, including affordability and arrearage credits, and administration and start-up costs included in the GAP tracker. Savings were considered including savings from avoided write-offs, service disconnections and reconnections, and collections activities. Write-offs, service disconnections and reconnections, and collection activities were reduced by lowering the number of accounts that proceeded down the disconnection path. The calculation of the savings from avoided write-offs is included as Attachment C; savings from avoided service disconnections and reconnections and collections are calculated above.

¹⁴ "Program Costs" exclude carrying charges.

¹⁵ The Savings From Avoided Disconnect, Reconnects, and Collections was based on an estimated cost of \$155 for years 2020 – 2023.

The service disconnections, reconnections, and other related “back-office” collection costs for 2024 were estimated as follows:

- MERC assumed that all service disconnections that were prevented through enrollment in the Program would have also involved a service reconnection,
- MERC estimated the cost of each disconnection/reconnection to be \$175.
- MERC estimated the cost of preparing and mailing disconnect notices and the required collection calls to be \$5 per customer.

In addition to tangible costs and benefits considered in the cost effectiveness analysis, there are additional benefits that cannot be quantified, such as improved household budget management through reduced utility bills.

4. Coordinate with other available low-income assistance

The following table lists the total federal dollars allocated to the State of Minnesota’s Energy Assistance Program during the last five Energy Assistance Program years:

Table 4. State of Minnesota - LIHEAP Allocations

Program Year	Minnesota LIHEAP Funding
2019-2020	\$117,911,033 (Additional \$8,998,379 from Coronavirus Aid, Relief, and Economic Security Act (“CARES”))
2020-2021	\$116,592,930 (Additional \$167,346,852 from American Rescue Plan Act of 2021 (“ARPA”))
2021-2022	\$118,998,851
2022-2023	\$164,195,383 (inclusive of Infrastructure Investment and Jobs Act (“IIJA”) appropriations and disaster funding)
2023-2024	\$125,856,129 (inclusive of IIJA appropriations and disaster funding)

The regular energy assistance grants of MERC’s GAP participants were not impacted by the Program benefits, as GAP does not take other assistance programs into account. Regular energy assistance grants are based on number of household members, gross household income, and 12 months of energy consumption, including the previous heating season. Energy assistance is not tied to amount of arrears or other possible assistance. The regular grant is the primary benefit that all eligible customers receive each LIHEAP program year.

Emergency (Crisis) energy assistance benefits provide additional assistance to customers who have higher arrears and are making regular payments but cannot pay their

entire monthly bill so may be falling further behind and are potentially facing service disconnection. There is no doubt that the emergency energy assistance benefits of GAP participants have been impacted by GAP benefits, because enrollment in GAP provides protection against any collection activity, so households avoid crisis scenarios. MERC does not feel, however, that it can make a fair and accurate analysis of the overall reduction of emergency benefits to GAP customers. There are too many variables that impact a customer's ability to qualify for emergency benefits and the actual amount of potential assistance, including the amount of available funding, the number of customers that apply for emergency assistance, and how the county agency determines need and pays benefits. Participation varies year-to-year. For example, a colder than normal winter and higher application trend would impact the number of customers the Program serves.

As the table below indicates, the number of customers receiving an energy assistance benefit had remained relatively steady in 2020 and 2021. In 2022 and 2023, relative to 2021, there was an increase in participation and grant totals due to increased available funding.

Table 5. MERC Recipients of LIHEAP Grants

Year	# of Recipients *	Grant Totals**
2020	12,125	\$4,317,732.78
2021	12,677	\$4,314,261.25
2022	14,063	\$8,806,858.85
2023	14,298	\$5,749,850.67
2024	13,598	\$4,127,404.55

* Includes recipients receiving a regular EAP heating assistance and crisis assistance.

** Based on LIHEAP Fiscal Year period.

As described in Docket No. G011/M-23-85, MERC transitioned its GAP from being administered by The Salvation Army to being administered internally in March 2023. With the transition, MERC has established internal processes to enroll customers, answer customer questions, and increase awareness of GAP. MERC's transition has provided for a more streamlined and simplified application process for GAP customers. MERC call center representatives have been trained to answer questions regarding GAP and to assist customers

with applying for GAP over the phone. In addition to informing customers who receive Energy Assistance about GAP and helping customers to enroll in GAP, MERC's Care Center representatives also refer individuals to MERC's Conservation Improvement Program/Energy Conservation and Optimization Weatherization and 4U2 (limited income) programs.

The Salvation Army continued to assist MERC customers with funds from the HeatShare program in 2024. HeatShare is a state-wide fuel fund for customers who are ineligible for or have incomes that are too great to receive a GAP affordability credit. HeatShare offers direct assistance, budget counseling, and energy conservation education. In an effort to help low-income households with the costs of heating, HeatShare works in conjunction with the Energy Assistance program on a statewide and local basis. MERC continues to support the HeatShare fund by providing a match of 50 cents for every dollar customers donate through their monthly gas bills. In 2024, MERC customers donated a total of \$43,955.62 via monthly gas bills and direct donations, and MERC provided \$21,977.82 in matching funds for a total of \$65,933.44.

MERC has regular contact through different channels with the energy assistance agencies and community agencies in its service territory. MERC's staff communicates with the energy assistance agencies and also meets with Department and Commission staff each year to discuss process improvements, issue resolution, assistance coordination, and strengthening partnerships with all stakeholders. MERC also continues to work with other utility staff to stay connected, discuss partnership opportunities, and to align Program practices where appropriate.

MERC also has a specially-trained group of customer service staff at its Customer Care Center who work on a daily basis with assistance agencies to better assist customers. The Customer Care Center has a designated toll-free phone line, Energy Assistance website, group email, and fax number, and provides assistance to energy assistance agencies in Minnesota, Wisconsin, and Michigan.

MERC promotes GAP in a variety of ways throughout the year—on its website; through quarterly bill inserts, Customer Connection articles, Care Center contacts, collection contacts,

and campaigns (including for customers in the disconnection process); through promotion and communication to and through the energy assistance agencies; and through targeted mailings to energy assistance recipients who are not enrolled in GAP. MERC has continued to file quarterly reports outlining promotional efforts in Docket No. G011/M-22-154. As detailed in those filings, MERC has implemented a number of proactive outreach campaigns targeted at increasing customer applications and enrollments of eligible customers in LIHEAP and GAP. MERC continues to offer GAP enrollment to customers in the collections process, including when customers are facing potential disconnection of service. MERC's promotional efforts to encourage qualifying customers to enroll in LIHEAP and GAP have resulted in increased enrollments, as detailed in MERC's quarterly reports.

5. Impact on service disconnections

MERC had approximately 228,733 Residential customers in 2024. In 2024, 3,882 Residential service customers were disconnected. As shown in Table 6 below, 1.39 percent of residential non-LIHEAP / non-GAP customers were disconnected. The number of disconnections in 2024 was lower than 2023. Following the resumption of disconnection activity in 2022,¹⁶ disconnections leveled off in 2024 as customers had lower arrears balances.

In 2024, four GAP customers were disconnected for nonpayment. GAP customers thus had a lower rate of disconnection compared to MERC's non-GAP LIHEAP customers who were disconnected at a rate of 6.68 percent in 2024. This data shows that customers who receive GAP are disconnected at a lower rate than customers who receive only LIHEAP. MERC's Customer Care Center employees have been trained to communicate the benefits of GAP to customers who are subject to collection activity. Table 6 below depicts the 2024 disconnections by customer category:

¹⁶ Following the Commission's May 26, 2021 Order Adopting Broad Transition Plan Proposal, Suspending Negative Reporting, and Establishing Notice and Communication Requirements in Docket No. E,G999/CI-20-375, MERC voluntarily continued to extend the suspension of disconnections for households with a pending application in eHEAT through May 31, 2022.

Table 6. 2024 Disconnections by Customer Category

Customer Category	Number of Disconnections	Percentage of Customers
2024 Non-LIHEAP Residential Customers (213,271)	2,970	1.39%
2024 GAP Participants (1,864)	4	0.21%
2024 LIHEAP Recipients (Non-GAP Participants) (13,598)	908	6.68%

Each disconnection the Company avoids generates savings associated with disconnection notices, reconnection fees, and multiple contacts and actions with community agencies, as well as savings through fewer write-offs as described in Section C.3 above.

1. Impact on payment frequency

To determine the payment amount for a customer, the Company reviews current billing and consumption information, and approved LIHEAP benefits and household income information. A qualified customer's payment each month includes payment of the customer's current month's bill after inclusion of the affordability credit, and payment of a portion of the customer's pre-program arrears, if applicable. Customers enrolled in the Program paid a total of \$568,295.34¹⁷ towards their energy costs in 2024. The average monthly payment-per-GAP-participant in 2024 was \$52.15 per month, excluding energy assistance payments.

With respect to the number of payments received, as shown in Table 7 below, inclusive of energy assistance payments, GAP participants had a higher percentage (129%) of payments received versus payments requested compared to non-GAP LIHEAP customers (74%) and non-LIHEAP residential customers (91%).¹⁸

¹⁷ Includes all payments, including Energy Assistance Payments.

¹⁸ See Attachment B for five years of historical data regarding these metrics.

Table 7. Number of Payments Received and Requested¹⁹

Customer Group	2024 Number of Payments Made/Number of Payments Requested (excluding energy assistance payments)	2024 Number of Payments Made/Number of Payments Requested (including energy assistance payments)
All GAP Participants	2,840 received 3,220 requested 88%	4,161 received 3,220 requested 129%
Non-GAP LIHEAP Customers	69,981 received 109,901 requested 64%	81,368 received 109,901 requested 74%
Non-LIHEAP Residential customers	2,138,030 received 2,359,813 requested 91%	2,138,064 received 2,359,813 requested 91%
GAP Participant Cohort (New GAP Customers)	927 received 1,699 requested 55%	1,210 received 1,699 requested 71%
GAP Participant Cohort before they were enrolled in GAP	1,362 received 2,238 requested 61%	1,751 received 2,238 requested 78%

Table 7 and Attachment B compare customer payment frequency based on the number of payments, including full and partial payments, for GAP participants, non-GAP LIHEAP customers, and non-LIHEAP Residential customers both with and without energy assistance payments included. This data continues to provide evidence that customers in the Program can make their payments if their monthly bill is reasonable or income-adjusted. GAP customer payments include payments made by customers as well as community assistance payments that have been credited to their account. For purposes of this reporting, any credit that is carried forward to future months is not counted as a customer payment those future months.

The Commission's September 22, 2010, Order, in Docket No. G007,011/M-07-1131, required utilities to report information on customer payment frequency that incorporates partial and late payment information. Table 7 above incorporates late payments, and full and partial payments.

¹⁹ GAP customers have a lower total number of payments requested due, in part, to GAP customers carrying credit balances month-to-month. Additionally, there are fewer GAP customers compared to other segments.

The payment data for the 2024 GAP enrollees is difficult to compare with overall payments because enrollment numbers have fluctuated over time. MERC saw a decrease in the number of Energy Assistance recipients in 2024, and the average heating benefit for MERC customers was approximately \$485. The average state-wide benefit for energy assistance in LIHEAP fiscal year 2024 was \$498. This is immaterially lower than the average benefit of \$500 noted for 2023. In 2024, when energy assistance payments are excluded, the data regarding dollars paid compared to dollars requested show GAP participants are paying at a lower rate (14%) than the non-GAP LIHEAP customers (58%) and lower than the non-LIHEAP Residential customers (93%).²⁰

Table 8. Dollars Paid and Requested

Customer Group	2024 Dollars Paid / Dollars Requested (excluding energy assistance payments)	2024 Dollars Paid / Dollars Requested (including energy assistance payments)
All GAP Participants	14%	52%
Non-GAP LIHEAP Customers	58%	96%
Non-LIHEAP Residential customers	93%	93%
GAP Participant Cohort (New GAP Customers)	28%	70%
GAP Participant Cohort before they were enrolled in GAP	51%	100%

D. PROGRAM COST AND RECOVERY, 2024 TRACKER

Effective August 1, 2022, the Commission approved MERC's proposal to reduce its GAP surcharge to \$0.00000 per therm in Docket No. G011/M-22-154. MERC maintained the \$0.00000 per therm GAP rate throughout 2023 and 2024. Additionally, \$32,854.39 was credited back to the GAP general ledger account, as reflected in Attachment A.

MERC's GAP Program costs booked to the GAP tracker in 2024 were \$959,558.61 including affordability and arrearage-forgiveness credits.²¹ MERC did not book any

²⁰ See Attachment B for five years of historical data regarding these metrics.

²¹ In accordance with the Commission's decision in Docket No. G011/GR-17-563, MERC has excluded regulatory assessments from the GAP tracker beginning in 2023.

administrative costs to the GAP tracker in 2024. Costs incurred to administer MERC's GAP program internally included costs associated with phone calls, enrolling customers, re-certifying customers, and ongoing customer outreach. Since transitioning GAP administration internally, MERC has not separately tracked and included such costs as administrative expenses in the GAP tracker, with the exception of costs associated with postage for customer mailings. As discussed below, in accordance with the Commission's August 14, 2024 Order in Docket No. G011/M-24-40, MERC is proposing to implement an automatic enrollment program for GAP, and anticipates incurring additional administrative costs related to the startup and ongoing implementation of that program.

The Commission's August 8, 2022 Order Accepting 2021 GAP Reports, Approving Surcharge Modifications, and Setting Additional Requirements in Docket No. G011/M-22-154 limited the amount of administrative costs included in the tracker to five percent of the annual actual Program spending, effective with the 2022 program year.²² Based on MERC's 2024 total program spending of \$959,558.61, five percent is equal to \$47,977.93. As noted above and reflected in Attachment A, MERC did not include any administrative costs in the GAP tracker in 2024.

In its September 15, 2021 Order Accepting Reports, Approving Program Modifications, and Setting Additional Reporting Requirements in Docket No. G011/M-21-224, the Commission approved MERC's proposal to suspend the annual GAP spending cap.²³ The Commission also ordered MERC to temporarily reduce its affordability threshold to three (3) percent and to discuss in its next annual GAP filing, the effect of the change on the program tracker balance and whether to revert, maintain, or otherwise modify the affordability threshold; whether to reduce the surcharge; and what to do regarding the spending cap. MERC provided this discussion in its

²² In Docket No. G011/M-22-154, the Commission limited recovery of GAP administrative costs to five percent of program spending effective with the 2022 program year.

²³ As reflected in MERC's Commission-approved tariffs, the annual spending cap of \$750,000 per year was suspended until reinstated by the Commission.

2021 GAP Annual Report in Docket No. G011/M-22-154, proposing to continue the modified three (3) percent of income affordability credit and continue to provide additional updates in its future annual reports regarding the impacts of this change.

MERC's 2024 year-end GAP tracker has a balance of \$5,464,538.69 based on 2024 GAP Program costs. In accordance with the Commission's September 15, 2021, Order Accepting Reports, Approving Program Modifications, and Setting Additional Reporting Requirements in Docket No. G011/M-21-224, MERC reduced its affordability threshold from six (6) percent to three (3) percent beginning in October 2021.²⁴ At that time, MERC also implemented the Commission's requirement that MERC determine GAP credits based on the updated annual participant natural gas bills and GAP customer annual household income. The implementation of this review and updates to customer affordability credits resulted in reductions to some customers' affordability credits based on their most recent income and natural bills.

MERC has continued to increase outreach efforts and has been successful in increasing enrollments in GAP. GAP spending on affordability and arrearage forgiveness credits increased approximately 26 percent between 2023 and 2024, reducing MERC's GAP tracker balance from year end 2023. MERC proposes to continue the three (3) percent of income affordability credit, which results in greater affordability credits to eligible customers as compared to the previous six (6) percent of income affordability credit, making bills more affordable for MERC's low-income customers and increasing spending on GAP.

Continuation of the three (3) percent of income affordability credit, resulting in higher affordability credit amounts, is reasonable in light of MERC's current tracker balance. To date, while MERC has experienced increased enrollment in GAP, applications have not outpaced

²⁴ While the change from six percent to three percent of income results in higher affordability credits, all else equal, increases in customer income since enrollment as well as lower natural gas bills resulted in reductions to some participants' affordability credits of more than the increase to the percent of income threshold.

available funding and MERC still has a positive GAP tracker balance available. In accordance with the Commission's August 14, 2024 Order in Docket No. G011/M-24-39, MERC is proposing to implement an automatic enrollment program, which the Company anticipates will result in significant additional GAP spending.

MERC is not proposing to modify the \$0.00000 GAP surcharge rate at this time but requests flexibility to propose reinstatement of a positive GAP surcharge balance once automatic enrollment has been implemented and the Company has more data to determine the expected annual costs of automatic enrollment and how quickly the existing tracker balance will be spent down.

E. PROGRAM PARTICIPATION, RETENTION, AND PROMOTION

1. Participation

MERC experienced a decrease of new participating customers in GAP during the 2024 Program year. There were a total of 289 new customer enrollments in 2024. This is a decrease of 358 from the 647 new enrollments in 2023. A total of 1,864 customers were enrolled in GAP at some time during the 2024 Program year.

Many factors contribute to the difficulty in comparing enrollment over time, including factors not controlled by MERC such as LIHEAP federal funding levels and payment schedules, weather, gas costs, and fluctuations in household incomes. In 2024, MERC did see an increase in the number of customers enrolled in GAP.

Approximately 12 percent of eligible LIHEAP customers participated in GAP in 2024. This number is slightly higher than the 2023 participation rate of 11 percent of eligible LIHEAP participants.

Of the 364 total applications for GAP received in 2024, nine (9) applicants were not eligible to enroll because they did not meet at least one of the Program requirements.²⁵ MERC does not have a waiting list of customers for the Program. All customers who have applied and meet the requirements have been enrolled in the Program.

2. Retention and Promotion of GAP

In 2024, MERC had a retention rate for GAP of 79 percent, which is a decrease from 2023. Three hundred eighty-seven customers were removed from GAP in 2024. This is up from 2023, when 148 GAP customers were removed. In 2024, 182 accounts were removed from GAP due to customers moving and not going back on GAP either because they moved outside of MERC's service area or because they did not reapply or qualify. MERC also removed 201 customer from GAP at the time of recertification. In accordance with the Commission's August 8, 2022 Order Accepting 2021 GAP Reports, Approving Surcharge Modifications, and Setting Additional Requirements in Docket No. G011/M-22-154, MERC only removes customers for nonpayment after two consecutive months' missed payments.

MERC provides a follow-up letter to all customers who are removed from the Program as a result of a move, alerting them of the need to make payment arrangements for any outstanding account balance and advising them of the option to reenroll if they are still a MERC customer at a different service address.

In accordance with the Commission's September 15, 2021 Order Accepting Reports, Approving Program Modifications, and Setting Additional Reporting Requirements in Docket No. G011/M-21-224, beginning in late 2021, participants who no longer met the GAP criteria were removed from the Program. Many of the participant removals in 2021 were due to accounts

²⁵ More specifically, these applicants were not eligible because they (1) did not have active gas service; (2) were not the customer of record; (3) did not have gas service with MERC; (4) were not a LIHEAP recipient (all of whom were encouraged to apply for LIHEAP); (5) did not qualify for a percent-of-income credit (high income relative to gas consumption); or (6) had defaulted from the Program in the same Program year.

without LIHEAP funds. Significantly fewer customers were removed in 2022 and 2023 as a result of this annual review. During its annual review process, MERC contacts each of the customers without LIHEAP to encourage and remind them to apply for LIHEAP and of the requirement to receive LIHEAP to remain on GAP. After the recertification process, at the end of 2024, 28 accounts were removed due to customers having not received LIHEAP, and 173 accounts were removed due to no longer meeting the remaining GAP program requirements. At the end of 2024, 1,477 customers were enrolled in GAP, which is down when compared to year-end 2023, at which time MERC had 1,566 GAP customers. MERC continues to offer GAP enrollment to customers in the collections process, including when customers are facing potential disconnection of service. MERC continues to promote GAP to customers calling in with bill payment questions and to coordinate with our partner agencies to encourage GAP enrollment. Table 9 below summarizes GAP participants and removals.

Table 9. 2020-2024 Program Participation

	2020	2021	2022	2023	2024
Enrolled at year-end	1,174	617	1,048	1,566	1,477
Removed – customer request ²⁶	94	113	88	41	182
Removed – nonpayment	34	63	78	0	4
Total GAP participants	1,304	1,183	1,208	1,714	1,864
Default rate – nonpayment ²⁷	3%	5%	6%	0%	0.2%

In preparation for the spring of 2024, MERC conducted training with Customer Care Center agents about the benefits of GAP, especially for those customers with significant post-

²⁶ Reasons for removal at customer request include customer moves and other customer request to be removed from the program.

²⁷ The default rate is calculated as the number of customers removed for nonpayment divided by the total participants at year-end.

Cold Weather Rule (“CWR”) arrears and customers struggling to make payments. The training encouraged call center agents to proactively help customers enroll in GAP to more affordably address their arrears over a longer period of time. MERC’s focus for the 2025 Program Year is to continue to increase applications for LIHEAP and GAP, including increased GAP enrollment through the proposed automatic enrollment program discussed below.

The Commission’s August 8, 2022 Order Accepting 2021 GAP Reports, Approving Surcharge Modifications, and Setting Additional Requirements in Docket No. G011/M-22-154 directed MERC to promote GAP to LIHEAP customers, past-due customers, customer protected by the CWR, and customers with higher levels of arrears and to submit quarterly reports to describe MERC’s outreach activities and to demonstrate increased GAP participation. MERC has continued to submit its quarterly reports outlining promotional efforts in Docket No. G011/M-22-154. As detailed in those filings, MERC has implemented a number of proactive outreach campaigns targeted at increasing customer applications and enrollments of eligible customers in LIHEAP and GAP. MERC continues to offer GAP enrollment to customers in the collections process, including when customers are facing potential disconnection of service. MERC’s promotional efforts to encourage qualifying customers to enroll in LIHEAP and GAP have resulted in increased enrollments, as detailed in MERC’s quarterly reports.

MERC has taken steps to ensure customers are notified well in advance of their annual recertification of the requirement to apply for and receive LIHEAP to remain enrolled in GAP. MERC contacts customers approximately 60 days ahead of their recertification date to remind them that they will need to recertify and to reapply for LIHEAP.

F. COMPLAINTS

In 2024, MERC received two Commission complaints regarding GAP – one from a customer who did not appreciate receiving payment reminder calls and the other was from a customer who incorrectly thought they had been removed from GAP for a missed payment, when they were removed from GAP due to enrolling in Cold Weather Rule protections.

G. GAP SUMMARY INFORMATION

In its September 25, 2013, Order in Docket No. G011/M-15-539, the Commission required that MERC submit the following information:

1. average annual affordability benefit received per customer;
2. average annual arrearage-forgiveness benefit received per customer;
3. percentage of Low Income Home Energy Assistance Program (LIHEAP funded) customers that participated in GAP;
4. disconnection rates for (a) GAP customers, (b) LIHEAP-Non GAP customers, and (c) non-LIHEAP Residential customers;
5. number of GAP participants enrolled as of year-end;
6. number of GAP participants enrolled and receiving benefits at some time during the year;
7. annual Program budget;
8. actual Program revenue;
9. actual Program cost;
10. GAP tracker balance as of year-end; and
11. GAP rate-affordability surcharge (\$/therm).

This information is included in the Table 10 below.

Table 10. 2024 GAP Summary Information

Average Annual Affordability Benefit per GAP Participant 2024	\$506.23
Average Annual Arrearage-Forgiveness Benefit per GAP Participant Receiving Arrearage Forgiveness in 2024	\$45.16
Percentage of MERC LIHEAP Customers that Participated in GAP during 2024	12.1%
Disconnection Rates-2024:	
GAP Customers	0.21% (4 Customers)
Non-GAP LIHEAP Customers	6.68% (908 Customers)

Non-LIHEAP Residential Customers	1.39% (2,970 Customers)
Number of GAP Participants Enrolled as of Year End 2024	1,477
Number of GAP Participants Enrolled and Receiving Benefits at Some Time During 2024	1,864
Annual Program Budget 2024	N/A; The Commission approved MERC's proposal to temporarily suspend the \$750,000 annual spending cap
Actual Program Revenue 2024	(\$846.69) ²⁸
Actual Program Cost 2024	\$959,558.61
GAP Tracker Balance as of Year-End 2024	\$5,464,538.69
GAP Rate-Affordability Surcharge in 2024 (\$/therm)	\$0.00000/therm

H. PROPOSED AUTOMATIC ENROLLMENT PROGRAM

Order Point 6 of the Commission's August 14, 2024, Order in Docket G011/M-24-39, required that the Company propose an automatic enrollment program in its 2025 GAP report, including the following information:

- a. Current tracker balance;
- b. Current monthly spending rate, number of GAP participants, and percent of participants who leave or are removed from the program each month;
- c. An estimate or range of estimates of monthly GAP spending, if all customers who receive LIHEAP and who are eligible to participate in GAP based on their income and energy cost were to be enrolled, and an explanation of the assumptions made in calculating this estimate; and

²⁸ MERC reduced the GAP surcharge rate to \$0.00000 effective August 1, 2022; program revenues credited to the tracker in 2024 are due to cancel/rebills.

- d. Demonstration that automatic enrollment is not expected to result in the denial of the program to new enrollees or applicants within the first year of operation.

The Company proposes to automatically enroll customers eligible for GAP starting in the summer of 2026, dependent on Commission approval.²⁹ The Company will report preliminary results of automatic enrollment, as available, in its 2026 GAP Report to be filed on or before March 31, 2027.

Regarding Order Point 6.a, the current GAP tracker balance is included in Attachment A. As discussed above, MERC had a positive tracker balance of approximately \$5.46 million as of year-end 2024 that can be used to help fund the proposed automatic enrollment program.

For Order Point 6.b, the Company's current monthly GAP spending rate is shown in Attachment A. The number of monthly GAP participants and percent of participants who leave or are removed from the program each month is included in Table 11 below.

Table 11. 2024 Monthly Net Change in GAP Customers

	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec	Avg
GAP Customers Beginning of Month	1,582	1,569	1,545	1,588	1,668	1,653	1,651	1,650	1,626	1,557	1,535	1,516	
GAP Customers End of Month	1,569	1,545	1,588	1,668	1,653	1,651	1,650	1,626	1,557	1,535	1,516	1,506	
Net % Change in GAP Customers	-0.83%	-1.55%	2.71%	4.80%	-0.91%	-0.12%	-0.06%	-1.48%	-4.43%	-1.43%	-1.25%	-0.66%	-0.44%

Regarding Order Point 6.c, MERC has projected annual costs of approximately \$4.1 million to \$4.24 million to implement the GAP automatic enrollment program. Additional details, including estimated monthly spending, is included in Attachment E to this filing. The Company

²⁹ MERC anticipates needing approximately six months to implement system configuration changes to implement automatic enrollment based on the details proposed in this filing and has proposed this timeline based on an anticipated Commission decision in the fall of 2025. If the Commission approves modifications from what MERC is proposing, or a Commission decision is delayed beyond fall of 2025, additional time may be required to implement the automatic enrollment program.

used the following assumptions to estimate monthly GAP spending if all customers who receive LIHEAP and who are eligible to participate in GAP based on their income and energy cost were to be enrolled through automatic enrollment:

- MERC began with the total actual pool of MERC LIHEAP customers as of July 2024, as reported in Docket No. E,G999/PR-24-2, of 12,786.³⁰
- Each month, MERC assumed a reduction of 0.5 percent of the pool of LIHEAP customers that could potentially be eligible for GAP, based on MERC's annual average of monthly net change in GAP participants in 2024, as reflected in Table 11 above.³¹
- MERC estimated that 70 percent of all LIHEAP customers will be eligible for GAP. MERC based this assumption on review of all LIHEAP customers who had a full year of billing data for LIHEAP Program Year 2024 (October 1, 2023-September 30, 2024) to determine the percentage of customers who would be eligible for GAP based on customer income and natural gas bills.
- MERC computed the estimated monthly affordability credit program costs based on the five-year average of monthly customer affordability credits, as shown in Attachment B to this filing.³² Based on this estimate, MERC forecasted annual affordability credit costs of approximately \$3.9 million per year.
- MERC estimated a range of arrearage forgiveness credit costs based on a range of the percent of enrolled GAP participants who enter GAP with arrears and receive arrearage forgiveness. MERC's low-end estimate is based on the percentage of GAP customers with arrears over the past five years (2020-2024), as reported in Attachment B, which is equal to seven percent. MERC's high-end estimate of arrearage forgiveness credits is based on the five year average

³⁰ The actual number of LIHEAP customers at the time MERC begins implementation of automatic enrollment is expected to vary from this 2024 actual number, based on a variety of factors including available LIHEAP funding and other factors.

³¹ The average monthly net change in GAP customers over the 12 months January-December 2024 was negative 0.44 percent, which MERC rounded up to 0.5 percent to account for customer removals as well as customer requests to be removed from automatic enrollment. Based on MERC's understanding of Xcel Energy's experience with automatic enrollment, MERC anticipates customer opt-out requests will be minimal.

³² MERC notes that this five-year period includes 2020 and 2021, before MERC reduced the GAP affordability threshold from six percent to three percent and implemented an annual recertification to set GAP affordability credits based on annual participant natural gas bills and updated GAP customer annual household income.

percent of non-GAP LIHEAP customers with arrears, which is equal to 32 percent. MERC applied the same estimated arrearage forgiveness credit amounts to both the high- and low-arrearage estimates based on the five-year average monthly arrears forgiveness credit per GAP customer (2020-2024). Based on this, MERC forecasted annual arrearage forgiveness credit costs of approximately \$35,000 to \$160,000.

- Under Minn. Stat. § 216B.16, subd. 15³³ and the Commission's August 8, 2022 Order Accepting 2021 GAP Reports, Approving Surcharge Modifications, and Setting Additional Requirements in Docket No. G011/M-22-154, MERC is permitted to recover administrative costs, start-up costs, and evaluation costs through the GAP Tracker. In accordance with the Commission's August 8, 2022, Order, MERC estimated annual administrative costs equal to five percent of total annual program spending on affordability and arrearage forgiveness. Five percent of MERC's estimated annual costs would be equal to approximately \$200,000 annually. MERC anticipates incurring incremental costs to implement automatic enrollment including customer communications and other expenses. Actual costs would be tracked and included in the tracker for recovery.

Based on these assumptions, as reflected in Attachment E, MERC has estimated annual costs for GAP automatic enrollment of approximately \$4.1 million to \$4.24 million.

Lastly, regarding Order Point 6.d, demonstration that automatic enrollment is not expected to result in the denial of the program to new enrollees or applicants within the first year of operation, based on MERC's projected annual cost for GAP automatic enrollment of approximately \$4.1 million to \$4.24 million, the Company anticipates the existing GAP tracker balance will be sufficient such that MERC will not need to deny new enrollments within the first year that automatic enrollment is in operation. As reflected in Attachment D, MERC is proposing to increase its annual GAP program budget to \$4.5 million. Consistent with the

³³ Under Minn. Stat. § 216B.16, subd. 15, "The commission may not allow a utility to recover administrative costs, excluding start-up costs, in excess of five percent of total program costs, or program evaluation costs in excess of two percent of total program costs. The commission must permit deferred accounting, with carrying costs, for recovery of program costs incurred during the period between general rate cases."

automatic enrollment programs the Commission has approved for CenterPoint Energy and Xcel Energy, MERC proposes that total GAP costs including start-up costs, affordability, arrearage forgiveness, and administrative costs not exceed \$4.5 million per year. Additionally, similar to the GAP automatic enrollment tariffs approved by the Commission for CenterPoint Energy and Xcel Energy, if there is an over-recovered balance in the GAP tracker in a given year, the over-recovered balance may be used in that year unless the Commission orders otherwise. As discussed above, MERC currently does not have a positive surcharge in place for its GAP, as the Company had a positive GAP tracker balance of approximately \$5.46 million as of the end of 2024. MERC is not proposing reinstatement of a positive surcharge rate at this time, but requests flexibility to request approval from the Commission to set a positive GAP surcharge outside of the annual GAP reporting process and timeframe when the available tracker balance is spent down. MERC has proposed tariff modifications in Attachment D to provide additional flexibility for the Company to request approval of a revised GAP surcharge outside of its annual GAP review.

The Company will continue to evaluate and report on the adequacy of the budget cap on an annual basis. Depending on many factors including customer removals, commodity costs, and LIHEAP program participation rates, automatically enrolling eligible customers into GAP could result in customers being put on a waiting list if the proposed annual budget cap and any available GAP tracker balance is exceeded. The Company will report on customers placed on a waiting list during the year in the annual GAP reports.

The Company proposes the following process and customer communications to implement its GAP automatic enrollment program:³⁴

³⁴ The proposed timing of these communications is based on an anticipated Commission decision in the fall of 2025.

1. In spring 2026, MERC will prepare and send a one-time mailing to all current LIHEAP customers with the following information:
 - i. A description of GAP.
 - ii. An explanation of MERC's GAP automatic enrollment process.³⁵
 - iii. A list of important deadlines associated with LIHEAP and GAP.
 - iv. A description of additional resources on LIHEAP and GAP, and where such resources can be accessed.
 - v. A notice that continued GAP enrollment is dependent on LIHEAP participation.
 - vi. A recommendation that customers seeking to remain on GAP apply to LIHEAP at the earliest possible opportunity.
 - vii. A notice that additional electric-side affordability programs may be available to customers of rate-regulated electric utilities and advising customers to contact their electric utility to request additional information.
2. To establish the initial auto-enrollment customer base to be automatically enrolled, prior to June 15, 2026 MERC will use the list of approved LIHEAP customers, along with each customer's household income information, received from the Department and as provided in customers' most recent LIHEAP applications, and customer's actual annual gas bills for the prior year to determine the group of customers eligible for GAP.
3. MERC will compute each eligible customer's monthly affordability credit and arrearage forgiveness credit based on household income as provided by the Department and annual consumption data.
4. Once benefit calculations have been made, MERC will send a letter via United States Postal Service first class mail to customers eligible for an affordability credit on or before July 15, 2026 to inform identified customers that they have been

³⁵ Including explanation that not all LIHEAP customers will be automatically enrolled as part of MERC's automatic enrollment program. Customers must meet the requirements of GAP to qualify for an affordability credit based on their household income and annual bill.

automatically enrolled in GAP and to tell customers the amount of the monthly bill credit(s) they will receive and the monthly payment requirements to remain on GAP. This communication will inform customers they have the ability to opt out of GAP enrollment anytime by contacting MERC customer service during regular business hours to request removal. These customer-specific communications will provide detailed information on GAP, including:

- i. The customer's monthly bill under GAP and the affordability credit they will receive.
 - ii. The customer's monthly arrearage forgiveness payment and arrearage forgiveness credit (if any).
 - iii. An explanation of GAP program terms, including an explanation that customers may be removed from the program for missed payments.
 - iv. An explanation of how any Energy Assistance grant balance on a customer's account will be applied, and how (if at all) that will delay or alter the application of GAP credits.
 - v. An explanation that, to remain enrolled in GAP, the customer must apply for and receive LIHEAP by their LIHEAP enrollment anniversary date of each subsequent year.
 - vi. Confirmation that the Company will not use customers' income information for any purpose other than to calculate their GAP program credits.
 - vii. A notification that customers may opt out of GAP by contacting MERC.
 - viii. Contact details for who the customer may contact to opt out or otherwise unenroll themselves from GAP.
- e. After completing the initial automatic enrollment of all eligible LIHEAP customers who had received LIHEAP as of May 2026, MERC will conduct rolling automatic enrollments throughout the Program year. Customers who receive LIHEAP during the Program year and are eligible for GAP will be automatically enrolled, will receive the same notice described above, and will be subject to the same opt-out provisions. Providing an ongoing automatic enrollment process will help the Company provide assistance to customers who may be in danger of service disconnection.

- f. Lastly, customers will always have the ability to call the Company for manual enrollment in GAP, following the same process as MERC currently uses for customer enrollments.

Customers will remain on GAP unless or until they request to be removed or are removed for nonpayment or because they no longer qualify for the Program. MERC will continue to conduct annual recertification review of all GAP customers to update customer GAP affordability credits and identify any customers who no longer qualify for participation. As discussed above, MERC already contacts customers approximately 60 days ahead of their recertification date to remind them that they will need to recertify and to reapply for LIHEAP. MERC will continue that process following implementation of automatic enrollment.

In addition to the above communications, MERC will include information regarding GAP and the automatic enrollment process in future LIHEAP promotional materials to inform prospective LIHEAP customers of GAP and the automatic enrollment process.

In order to implement the proposed automatic enrollment plan as discussed above, MERC will need to conduct system configuration changes.³⁶ As discussed above, MERC proposes to implement auto enrollment beginning in summer of 2026, dependent upon Commission approval, with initial customer communications in spring of 2026.

Included in Attachment D are clean and redlined GAP tariff sheets incorporating proposed language modifications to implement automatic enrollment as described above.

CONCLUSION

MERC respectfully requests that the Commission accept the Company's 2024 Annual GAP Report as compliant with MERC's tariffs and Commission orders. MERC also proposes continuation of the three (3) percent of income affordability credit approved in Docket No. G011/M-21-224. Finally, MERC requests that the Commission approve its proposal for

³⁶ The Company is currently estimating changes, as proposed, will require approximately six months to complete.

automatic enrollment, as detailed in this filing and reflected in the proposed tariff sheets included in Attachment D.

DATED: March 31, 2025

Respectfully submitted,

TAFT STETTINIUS & HOLLISTER LLP

/s/ Kristin M. Stastny

Kristin M. Stastny

2200 IDS Center

80 South 8th Street

Minneapolis, MN 55402

Telephone: (612) 977-8656

KStastny@Taftlaw.com

Attorney for Minnesota Energy Resources
Corporation

Attachment A
2024 GAP Tracker

		<u>Beginning Balance</u>				<u>Dollars Paid for</u>				<u>Cumulative Carry</u>			
		<u>Subject to Carry</u>	<u>Funding (from</u>	<u>Credits Due to</u>		<u>Arrearage</u>	<u>Administration</u>	<u>Dollars Paid for</u>	<u>Balance Subject to</u>	<u>Costs Beginning</u>		<u>Cumulative Carry</u>	
		<u>Cost-Over (Under)</u>	<u>bills/refunds)</u>	<u>Final Accounts</u>		<u>Forgiveness</u>	<u>Costs</u>	<u>Affordability</u>	<u>Carry Cost</u>	<u>Balance</u>	<u>Carry Cost</u>	<u>Costs</u>	<u>Balance</u>
Actual	Jan-24	\$5,412,990.31	\$ 4.13		\$	1,528.77		\$ 84,239.87	\$ 5,327,225.80	\$ 699,678.66	\$ 15,981.68	\$ 715,660.33	\$ 6,042,886.13
	Feb-24	\$5,327,225.80	\$ (58.53)		\$	1,392.70		\$ 71,789.28	\$ 5,253,985.29	\$ 715,660.33	\$ 15,761.96	\$ 731,422.29	\$ 5,985,407.58
	Mar-24	\$5,253,985.29	\$ (532.87)		\$	884.34		\$ 72,674.17	\$ 5,179,893.91	\$ 731,422.29	\$ 26,590.12	\$ 758,012.41	\$ 5,937,906.32
	Apr-24	\$5,179,893.91	\$ (11.78)	\$ 9,993.72	\$	1,270.26		\$ 82,479.17	\$ 5,106,126.42	\$ 758,012.41	\$ 26,211.45	\$ 784,223.86	\$ 5,890,350.28
	May-24	\$5,106,126.42	\$ 15.60		\$	1,181.75		\$ 86,261.67	\$ 5,018,698.60	\$ 784,223.86	\$ 25,762.65	\$ 809,986.51	\$ 5,828,685.11
	Jun-24	\$5,018,698.60	\$ 19.46		\$	1,379.68		\$ 78,657.46	\$ 4,938,680.92	\$ 809,986.51	\$ 25,351.90	\$ 835,338.41	\$ 5,774,019.33
	Jul-24	\$4,938,680.92	\$ (38.64)	\$ 381.85	\$	1,506.55		\$ 78,708.00	\$ 4,858,809.58	\$ 835,338.41	\$ 24,941.89	\$ 860,280.30	\$ 5,719,089.88
	Aug-24	\$4,858,809.58	\$ (195.16)		\$	1,309.10		\$ 83,582.70	\$ 4,773,722.62	\$ 860,280.30	\$ 24,505.11	\$ 884,785.41	\$ 5,658,508.02
	Sep-24	\$4,773,722.62	\$ (0.27)	\$ 15,435.66	\$	1,342.06		\$ 78,092.29	\$ 4,709,723.66	\$ 884,785.41	\$ 24,176.58	\$ 908,961.99	\$ 5,618,685.65
	Oct-24	\$4,709,723.66	\$ (22.07)		\$	1,540.57		\$ 85,036.33	\$ 4,623,124.69	\$ 908,961.99	\$ 23,732.04	\$ 932,694.03	\$ 5,555,818.72
	Nov-24	\$4,623,124.69	\$ (26.56)		\$	1,268.74		\$ 67,283.24	\$ 4,554,546.15	\$ 932,694.03	\$ 23,380.00	\$ 956,074.03	\$ 5,510,620.18
	Dec-24	\$4,554,546.15	\$ -	\$ 7,043.16	\$	1,337.03		\$ 74,812.88	\$ 4,485,439.40	\$ 956,074.03	\$ 23,025.26	\$ 979,099.29	\$ 5,464,538.69
			\$ (846.69)	\$ 32,854.39	\$	15,941.55	\$ -	\$ 943,617.06			\$ 279,420.63		

Attachment B
2020-2024 GAP Streamlined Reporting Form

Program dates and status	2020	2021	2022	2023	2024
Date program started	4/1/2008	4/1/2008	4/1/2008	4/1/2008	4/1/2008
Program effective date	4/1/2008	4/1/2008	4/1/2008	4/1/2008	4/1/2008
Date next evaluation report due	5/31/2022	5/31/2022	5/31/2022 (Per Order issued 1/18/2023 in Docket No. G011/M-22-248, the Commission discontinued GAP three-year evaluation Reports and instead required five-years of historical data in each GAP annual report. MERC submitted its first annual evaluation with five years of historical data on March 31, 2023).	3/31/2025 (Per Order issued 1/18/2023 in Docket No. G011/M-22-248, the Commission discontinued GAP three-year evaluation Reports and instead required five-years of historical data in each GAP annual report).	3/31/2026 for the period 1/1/2025-12/31/2025 and including 5-years of historical data
Date last evaluation completed	Filed 5/31/2019 for the period 1/1/2015 through 12/31/2018	Filed 5/31/2019 for the period 1/1/2015 through 12/31/2018	Filed 5/31/2022 for the period 1/1/2019 through 12/31/2021	Filed 5/31/2023 for the period 1/1/2022 through 12/31/2022 and including 5 years of historical data	Filed 3/29/2024 for the period 1/1/2023-12/31/2023 and including 5 years of historical data
Last evaluation docket number	G-011/M-19-369	G-011/M-19-369	G-011/M-22-248	G-011/M-23-85	G-011/M-24-39
Status of program (pilot or permanent)	Permanent	Permanent	Permanent	Permanent	Permanent
Date pilot program ends, if applicable	Not applicable	Not applicable	Not applicable	Not Applicable	Not Applicable
Date of last Evaluation Order	1/17/2020	1/17/2020	1/18/2023	9/7/2023	8/14/2024
Program administrator	The Salvation Army	The Salvation Army	The Salvation Army	The Salvation Army until 03/23/2023 MERC from 03/24/2023 forward	MERC
Participant benefits					
Description of affordability benefit - maximum payment as % of household income	6%	6% / revised to 3% prior to year end 2021.	3%	3%	3%
Description of arrearage forgiveness benefit - repayment period	24 Months	24 Months	24 months	24 months	24 months
Average annual income per participant	\$11,193.87	\$9,330.51	\$19,012.08	\$15,166.01	\$7,289.00
Average annual bill per participant	\$655.16	\$775.05	\$1,186.14	\$1,074.33	\$750.85
Average arrearage balance per participant	-\$1,050.00	-\$480.78	-\$392.40	-\$351.48	-\$444.09
Average annual affordability benefit per participant	\$443.09	\$556.87	\$280.79	\$439.75	\$506.23
Average annual arrearage forgiveness benefit per customer	\$76.42	\$106.69	\$17.75	\$32.65	\$45.16
Average total benefit per participant	\$449.12	\$562.64	\$282.75	\$445.51	\$514.78
Cost and Cost Recovery					
Annual budget	\$750,000.00	\$750,000; The Commission approved MERC's proposal to temporarily suspend the \$750,000 annual spending cap	N/A; The Commission approved MERC's proposal to temporarily suspend the \$750,000 annual spending cap	N/A; The Commission approved MERC's proposal to temporarily suspend the \$750,000 annual spending cap	N/A; The Commission approved MERC's proposal to temporarily suspend the \$750,000 annual spending cap
Actual revenue	\$2,686,903.29	\$2,633,595.46	\$2,290,933.72	\$2,883.59	-\$846.69
Annual cost	\$629,009.33	\$704,867.82	\$363,602.03	\$767,923.57	\$959,558.61
Surcharge (\$/therm)	\$0.00905/therm	\$0.00905/therm	\$0.00905/therm through 7/31/2022; \$4.75 (Based on 7 months with surcharge in 2022 and 75 therms/month)	\$0.00000/therm	\$0.00000/therm
Annual cost of surcharge for average residential customer who uses 900 therms of	\$8.15	\$8.15		\$0.00	\$0.00
Customer classes assessed the GAP surcharge	Firm Service Customers	Firm Service Customers	Firm Service Customers	Firm Service Customers	Firm Service Customers
Tracker balance as of year-end	\$2,280,485.46	\$4,435,340.43	\$6,632,861.90	\$6,112,668.97	\$5,464,538.69
Participation					
% of LIHEAP customers that participated in GAP	9.62%	8.54%	7.9%	10.7%	0.0%
Number of participants enrolled as of year-end	1,174	617	1,048	1,566	1,477
Number of participants enrolled and receiving benefits at some time during the year	1,304	1,183	1,208	1,714	1,864
Whether a waiting list occurred at any time during the year	No	No	No	No	No
If so, the number of customers on the waiting list and for how long	N/A	N/A	N/A	N/A	N/A
Impact on disconnection rates					
Disconnection rates - non-GAP LIHEAP baseline					
GAP participants	0.00%	0.00%	0.08%	0.00%	0.21%
Non-GAP LIHEAP customers	0.57%	0.43%	7.22%	7.97%	6.68%
Non-LIHEAP residential customers	0.13%	0.36%	1.64%	1.91%	1.39%
Disconnection rates - pre-program baseline					
GAP participant cohort	0%	0%	0.54%	0.00%	2.08%
GAP participants cohort before they were enrolled in GAP	0%	0%	0.18%	0.93%	2.08%
Impact on payment frequency					
Dollars paid ÷ dollars requested					
Non-GAP LIHEAP Baseline					
GAP participants	53%	90%	61%	69%	52%
Non-GAP LIHEAP customers	95%	113%	93%	102%	96%
Non-LIHEAP residential customers	96%	92%	94%	103%	93%
Pre-Program Baseline					
GAP participant cohort	80%	125%	79%	91%	70%
GAP participant cohort before they were enrolled in GAP	87%	108%	94%	93%	100%
Number of payments made paid ÷ number of payments requested					
Non-GAP LIHEAP baseline					
GAP participants	151%	229%	107%	101%	129%

	2020	2021	2022	2023	2024
Non-GAP LIHEAP customers	89%	83%	73%	79%	74%
Non-LIHEAP residential customers	91%	90%	91%	92%	91%
Pre-program baseline					
GAP participant cohort	82%	88%	96%	93%	71%
GAP participant cohort before they were enrolled in GAP	75%	91%	96%	88%	78%
Impact on arrears					
% Customers in arrears					
Non-GAP LIHEAP baseline					
GAP participants	6%	7%	9%	8%	7%
Non-GAP LIHEAP customers	35%	31%	31%	31%	29%
Non-LIHEAP residential customers	15%	15%	17%	16%	17%
Pre-Program baseline					
GAP participant cohort	26%	19%	11%	12%	19%
GAP participant cohort before they were enrolled in GAP	21%	14%	6%	8%	13%
Dollar amount of arrears					
% Change in dollar amount of arrears (non-GAP LIHEAP baseline)					
GAP participants	-64%	-236%	-12%	-71%	-72%
Non-GAP LIHEAP customers	55%	-48%	-68%	-67%	-48%
Non-LIHEAP residential customers	74%	-38%	-39%	-49%	-30%
Dollar amount of arrears (pre-Program baseline)					
GAP participant cohort	\$3,421.68	\$3,542.37	\$26,171.89	\$34,985.68	\$18,851.35
GAP participant cohort before they were enrolled in GAP	\$2,927.91	\$1,736.88	\$10,302.58	\$31,436.26	\$12,015.27
Complaints					
Number of complaints	0	0	0	2	2
Nature of complaint(s)	N/A	N/A	N/A	Ineligibility and payment plan information	Missed payment reminders and removal from GAP (See Section F of MERC's 2024 Annual Report).
Retention					
GAP participant retention rate	89%	52%	87%	91%	79%
Impact on collection activity					
Brief description of effect of GAP on collection activity	Section J (page 16 of Annual Report)	Section J (page 16 of Annual Report)	Section C.3 of MERC's 2022 Annual Report	Section C.3 of MERC's 2023 Annual Report	Section C.3 of MERC's 2024 Annual Report
Coordination with other programs					
Page(s) of report where coordination efforts described	Section K (page 16-18 of of Annual Report - Docket No. G011/M-21-224)	Section K (page 16-18 of Annual Report - Docket No. G011/M-22-154)	Section C.4 of MERC's 2022 Annual Report	Section C.4 of MERC's 2023 Annual Report	Section C.4 of MERC's 2024 Annual Report

Attachment C
Estimated Savings From Avoided Write-Offs

MERC Write - Offs (Gross)					
<u>Dollars</u>					
	2020	2021	2022	2023	2024
All Write Off \$	\$1,657,685	\$1,085,365	\$3,219,648	\$2,510,957	\$865,899
LIHEAP Write Off \$	\$903,374	\$549,446	\$357,990	\$278,978	\$322,208
% of LIHEAP vs All	54.50%	50.62%	11.12%	11.11%	37.21%
GAP Write Off \$	\$6,147	-\$4,324	\$2,128	\$10,428	\$5,579
% of GAP vs LIHEAP	0.68%	-0.79%	0.59%	3.74%	1.73%
<u>Accounts</u>					
All Write Off Accounts	36,223	35,586	38,904	38,735	39,491
LIHEAP Write Off Accounts	4,314	4,038	4,446	4,501	4,083
% LIHEAP vs All	11.91%	11.35%	11.43%	11.62%	10.34%
GAP Write Off All	1,304	1,183	1,208	1,714	1,864
GAP Write Off Accounts	9	16	58	114	56
% GAP vs LIHEAP	0.21%	0.40%	1.30%	2.53%	1.37%
Average All Accounts Write-Off	\$45.76	\$30.50	\$82.76	\$64.82	\$21.93
Average LIHEAP Write-Off	\$209.41	\$136.07	\$80.52	\$61.98	\$78.91
Estimated Write-Off Not Done Due to GAP	\$ 32,296.32	\$ 18,018.43	\$ 10,582.17	\$ 11,523.54	\$ 14,751.51
Est Afford Credits Write-Off Not Done Due to GAP	314,869.63	333,494.66	37,714.98	\$ 753,738.56	\$ 943,617.06
Est Arrs Forgive Crdts Write-Off Not Done Due to GAP	4,289.62	3,456.58	262.44	\$ 9,860.01	\$ 15,941.55
Total Write Offs Not Done due to GAP	<u>\$ 351,455.57</u>	<u>\$ 354,969.67</u>	<u>\$ 48,559.60</u>	<u>\$ 775,122.11</u>	<u>\$ 974,310.12</u>

Total Program Write Offs Not Done 2020-2024

\$ 2,504,417.07

Attachment D
Proposed Redline and Clean GAP Tariff Sheets

Clean Tariff Sheets

GAS AFFORDABILITY PROGRAM (GAP)

7th Revised Sheet No. 7.09

1. Availability:

GAP is available to residential customers in the MERC Minnesota service area who have been qualified and receive assistance from the Low Income Home Energy Assistance Program ("LIHEAP") during the federal fiscal year ("Program Year").

2. Program Description and Rate Impact for Qualifying Customers:

This Program shall meet the conditions of Minnesota Statutes, Chapter 216B.16, Subd. 15 on low income programs. The Program has two components: 1) Affordability, and 2) Arrearage Forgiveness. MERC or an agent of MERC, will review current billing and consumption information, approved LIHEAP benefits and household income information as obtained from the Department of Commerce to determine a Qualified Customer's affordability bill credit and arrearage forgiveness. A Qualified Customer's payment each month shall include both payment of the customer's current month's bill after inclusion of the affordability bill credit, and payment of a portion of the Qualified Customer's pre-program arrears.

2.1. *Affordability Component:*

The Affordability component consists of a bill credit determined as one-twelfth of the difference between the Qualified Customer's actual annual gas bills from the prior year and 3% of the Qualified Customer's actual annual household income as provided by the Qualified Customer in their most recent LIHEAP application. This bill credit is a Program cost that will be included in the Tracker. Any energy assistance sums not applied to arrears will be applied to a Qualified Customer's current bill.

2.2. *Arrearage Forgiveness Component:*

The Arrearage Forgiveness component consists of a monthly credit that will be applied each month after receipt of the Qualified Customer's payment. The credit will be designed to retire pre-program arrears over a period of up to 24 months, with the Company matching the Qualifying Customer's contribution to retiring pre-program arrears. The credit is determined by taking the pre-program arrears divided by the number of months to retire the arrears divided by two and then subtracting any energy assistance sums received by the Company on behalf of the customer divided by the number of months remaining to retire the arrears divided by two. This arrearage forgiveness credit is a Program cost that will be included in the Tracker.

GAS AFFORDABILITY PROGRAM (GAP)
(Continued)

7th Revised Sheet No. 7.10

3. Conditions of Service:

- 3.1. Enrollment participation is limited to a first come first served basis until the estimated Program dollar cap and any available Tracker over-recovery balance is reached.
- 3.2. In July 2026 and on a rolling basis thereafter, upon receipt of LIHEAP and household income information, the Company will run the GAP calculation to determine program benefits and, for those customers where a Program benefit exists, an automatic enrollment letter will be mailed notifying the Qualified Customer they have been enrolled in GAP. This communication will inform customers they have the ability to opt out of GAP anytime by contacting MERC to request removal. Eligible LIHEAP customers that meet Program criteria may opt-in to the Program at any time during the year subject to Program availability.
- 3.3. Regardless of arrears balances, MERC agrees to maintain service and suspend collection activities to Qualified Customers enrolled in the Program if they maintain their payment schedule.
- 3.4. Qualified Customers enrolled in the Program must maintain an active MERC account in said customer's name at their permanent primary residence only to be eligible for this Program.
- 3.5. Qualified Customers enrolled in the Program agree to notify MERC of any changes in address, income level, or household size. Such changes may result in removal from the Program. Additionally, Qualified Customers who do not continue to qualify under the provisions of Section 1 above can be removed from the Program.
- 3.6. If a Qualified Customer enrolled in the Program fails to pay two consecutive monthly payments in full under the Program, they will be terminated from the Program and will be subject to MERC's regular collection practices including the possibility of disconnection.

4. Funding:

- 4.1. Total Program costs, which include start-up costs, Affordability component, Arrearage Forgiveness component and incremental administration costs incurred by MERC shall not exceed \$4,500,000 per year. However, if there is an over-recovered balance in the Tracker in a given year, the over-recovered balance may be used in that year unless the Minnesota Public Utilities Commission orders otherwise. MERC shall limit administrative costs included in the Tracker (except start-up related costs) to 5% of annual Program spending on Affordability Credits and Arrearage Forgiveness. Administrative costs will include, but are not limited to, the costs to inform customers of the Program and costs to process and implement enrollments.
- 4.2. MERC shall recover Program costs in the GAP Surcharge applicable to all firm service customers receiving service under Rate Schedules GS-NNG General Service and GS-Consolidated General Service.

GAS AFFORDABILITY PROGRAM (GAP)
(Continued)

9th Revised Sheet No. 7.11

- 4.3. A tracking mechanism (“Tracker”) will be established to provide for recovery of actual Program costs as compared to the recovery of Program costs through the GAP Surcharge. MERC will track and defer Program costs with regulatory approval. The prudence of the Program costs are subject to regulatory review.
- 4.4. Program costs shall be recovered in the GAP Surcharge from all firm service customers receiving service under Rate Schedules GS-NNG and GS-Consolidated as shown in Tariff Sheets 5.00 – 5.02a. Effective August 1, 2022, the surcharge shall be \$0.00000 per therm. MERC may petition the Commission to adjust this rate in order to true-up the forecasted Program balance in the Tracker either in a general rate case, in an annual GAP report filing, or in another filing.
5. Evaluation:
 - 5.1. The Program shall be evaluated annually and may be modified based on annual reports and on a financial evaluation.
 - 5.2. The annual reports will include the effect of the Program on customer payment frequency, payment amount, arrearage level and number of customers in arrears, service disconnections, retention rates, customer complaints and utility customer collection activity. The annual reports may also include information about customer satisfaction with the Program.
 - 5.3. The financial evaluation will include a discounted cash flow of the Program’s cost-effectiveness analysis from a ratepayer perspective comparing the 1) total Program costs, which includes the Affordability component, Arrearage Forgiveness component and total company incurred administration costs, to 2) the total net savings including cost reductions on utility functions such as the impact of the Program on write-offs, service disconnections and reconnections and collections activities. The discounted cash flow difference between total Program costs and total net savings will result in either a net benefit or a net cost to ratepayers for the Program.
6. Program Revocation:

The Program is effective unless the Commission, after notice and hearing, rescinds or amends its order approving the Program.
7. Term:

The Program is approved on a permanent basis, with annual reports, including program evaluation, to be filed by March 31 each year.
8. Applicability:

Unless otherwise specified in this tariff, Qualified Customers in the Program shall receive service in accordance with all terms and conditions of the standard gas service tariffs applicable to residential customers.

Redlined Tariff Sheets

GAS AFFORDABILITY PROGRAM (GAP)

76th Revised Sheet No. 7.09

1. Availability:

GAP is available to residential customers in the MERC Minnesota service area who have been qualified and receive assistance from the Low Income Home Energy Assistance Program (“LIHEAP”) during the federal fiscal year (“Program Year”).

2. Program Description and Rate Impact for Qualifying Customers:

This Program shall meet the conditions of Minnesota Statutes, Chapter 216B.16, Subd. 15 on low income programs. The Program has two components: 1) Affordability, and 2) Arrearage Forgiveness. MERC or an agent of MERC, will review current billing and consumption information, approved LIHEAP benefits and household income information as ~~submitted to~~ MERC obtained from the Department of Commerce to determine a Qualified Customer’s affordability bill credit and arrearage forgiveness. A Qualified Customer’s payment each month shall include both payment of the customer’s current month’s bill after inclusion of the affordability bill credit, and payment of a portion of the Qualified Customer’s pre-program arrears.

2.1. *Affordability Component:*

The Affordability component consists of a bill credit determined as one-twelfth of the difference between the Qualified Customer’s actual annual gas bills from the prior year and 3% of the Qualified Customer’s actual annual household income as provided by the Qualified Customer in their most recent LIHEAP application. This bill credit is a Program cost that will be included in the Tracker. Any energy assistance sums not applied to arrears will be applied to a Qualified Customer’s current bill.

2.2. *Arrearage Forgiveness Component:*

The Arrearage Forgiveness component consists of a monthly credit that will be applied each month after receipt of the Qualified Customer’s payment. The credit will be designed to retire pre-program arrears over a period of up to 24 months, with the Company matching the Qualifying Customer’s contribution to retiring pre-program arrears. The credit is determined by taking the pre-program arrears divided by the number of months to retire the arrears divided by two and then subtracting any energy assistance sums received by the Company on behalf of the customer divided by the number of months remaining to retire the arrears divided by two. This arrearage forgiveness credit is a Program cost that will be included in the Tracker.

GAS AFFORDABILITY PROGRAM (GAP)
(Continued)

76th Revised Sheet No. 7.10

3. Conditions of Service:

- 3.1. Enrollment participation is limited to a first come first served basis until the estimated Program dollar cap and any available Tracker over-recovery balance is reached. ~~This limitation is suspended until reinstated by the MPUC.~~
- 3.2. In July 2026 and on a rolling basis thereafter, upon receipt of LIHEAP and household income information, the Company will run the GAP calculation to determine program benefits and, for those customers where a Program benefit exists, an automatic enrollment letter will be mailed notifying the Qualified Customer they have been enrolled in GAP. This communication will inform customers they have the ability to opt out of GAP anytime by contacting MERC to request removal. Eligible LIHEAP customers that meet Program criteria may opt-in to the Program at any time during the year subject to Program availability. Each year, MERC will provide information on the Program to targeted current LIHEAP customers in arrears.
- 3.3. Regardless of arrears balances, MERC agrees to maintain service and suspend collection activities to Qualified Customers enrolled in the Program if they maintain their payment schedule.
- 3.4. Qualified Customers enrolled in the Program must maintain an active MERC account in said customer's name at their permanent primary residence only to be eligible for this Program.
- 3.5. Qualified Customers enrolled in the Program agree to notify MERC of any changes in address, income level, or household size. Such changes may result in removal from the Program. Additionally, Qualified Customers who do not continue to qualify under the provisions of Section 1 above can be removed from the Program.
- 3.6. If a Qualified Customer enrolled in the Program fails to pay two consecutive monthly payments in full under the Program, they will be terminated from the Program and will be subject to MERC's regular collection practices including the possibility of disconnection.

4. Funding:

- 4.1. Total Program costs, which include start-up costs, Affordability component, Arrearage Forgiveness component and incremental administration costs incurred ~~collectively~~ by MERC shall not exceed ~~\$750,000~~ \$4,500,000 per year per year plus the estimated tracker balance as of December 31, 2011. However, if there is an over-recovered balance in the Tracker in a given year, the over-recovered balance may be used in that year unless the Minnesota Public Utilities Commission orders otherwise. This annual spending cap is suspended until reinstated by the MPUC. Effective with the 2022 program year, MERC shall limit administrative costs included in the Tracker (except start-up related costs) to 5% of annual Program spending on Affordability Credits and Arrearage Forgiveness. Administrative costs will include, but are not limited to, the costs to inform customers of the Program and costs to process and implement enrollments.

GAS AFFORDABILITY PROGRAM (GAP)
(Continued)

16th Revised Sheet No. 7.10

4.2. MERC shall recover Program costs in the GAP Surcharge applicable to all firm service customers receiving service under Rate Schedules GS-NNG General Service and GS-Consolidated General Service.

~~4.3. A tracking mechanism ("Tracker") will be established to provide for recovery of actual Program costs as compared to the recovery of Program costs through the GAP Surcharge. MERC will track and defer Program costs with regulatory approval. The prudence of the Program costs are subject to regulatory review.~~

Date Filed: ~~September 15, 2023~~ March 31, 2025
~~September 7, 2023~~ Upon Commission Approval

Docket No.: G011/M-25-393-85

Submitted By: Theodore Eidukas
Vice President –Regulatory Affairs

Effective Date:

GAS AFFORDABILITY PROGRAM (GAP)
(Continued)

98th Revised Sheet No. 7.11

- 4.3. A tracking mechanism (“Tracker”) will be established to provide for recovery of actual Program costs as compared to the recovery of Program costs through the GAP Surcharge. MERC will track and defer Program costs with regulatory approval. The prudence of the Program costs are subject to regulatory review.
- 4.4. Program costs shall be recovered in the GAP Surcharge from all firm service customers receiving service under Rate Schedules GS-NNG and GS-Consolidated as shown in Tariff Sheets 5.00 – 5.02a. Effective August 1, 2022, the surcharge shall be \$0.00000 per therm. MERC may petition the Commission to adjust this rate in order to true-up the forecasted Program balance in the Tracker either in a general rate case, in an annual GAP report filing, or in another filing. ~~a future GAP evaluation filing.~~
5. Evaluation:
- 5.1. The Program shall be evaluated annually and may be modified based on annual reports and on a financial evaluation.
- 5.2. The annual reports will include the effect of the Program on customer payment frequency, payment amount, arrearage level and number of customers in arrears, service disconnections, retention rates, customer complaints and utility customer collection activity. The annual reports may also include information about customer satisfaction with the Program.
- 5.3. The financial evaluation will include a discounted cash flow of the Program’s cost-effectiveness analysis from a ratepayer perspective comparing the 1) total Program costs, which includes the Affordability component, Arrearage Forgiveness component and total company incurred administration costs, to 2) the total net savings including cost reductions on utility functions such as the impact of the Program on write-offs, service disconnections and reconnections and collections activities. The discounted cash flow difference between total Program costs and total net savings will result in either a net benefit or a net cost to ratepayers for the Program.
6. Program Revocation:
- The Program is effective unless the Commission, after notice and hearing, rescinds or amends its order approving the Program.
7. Term:
- The Program is approved on a permanent basis, with annual reports, including program evaluation, to be filed by March 31 each year.
8. Applicability:
- Unless otherwise specified in this tariff, Qualified Customers in the Program shall receive service in accordance with all terms and conditions of the standard gas service tariffs applicable to residential customers.

Attachment E

Estimated Annual Costs for GAP Automatic Enrollment

Month	LIHEAP Customers ¹	Reductions Due to Removals ²	% Qualified for GAP Based on Income/Gas Bills ³	Average Affordability past 5 years (GAP Program) ⁴	Monthly Affordability Cost	Range of Estimated Customers who will receive Arrears Forgiveness (low)	Range of Estimated Customers who will receive Arrears Forgiveness (high) ⁵	Estimated Monthly Arrears Forgiveness Credit/Customer ⁶	Monthly Arrears Forgiveness Estimate (low)	Monthly Arrears Forgiveness Estimate (high)	Total Monthly Cost of Automatic Enrollment (low % arrears)	Total Monthly Cost of Automatic Enrollment (high % arrears)
July	12,786	12,786	8,950	\$37.11	\$332,164.30	627	2,864	\$4.64	\$2,909.64	\$13,301.19	\$335,073.93	\$345,465.49
August	12,787	12,723	8,906	\$37.11	\$330,529.32	627	2,864	\$4.64	\$2,909.64	\$13,301.19	\$333,438.96	\$343,830.52
September	12,723	12,659	8,862	\$37.11	\$328,876.68	627	2,864	\$4.64	\$2,909.64	\$13,301.19	\$331,786.31	\$342,177.87
October	12,659	12,596	8,817	\$37.11	\$327,232.29	627	2,864	\$4.64	\$2,909.64	\$13,301.19	\$330,141.93	\$340,533.49
November	12,596	12,533	8,773	\$37.11	\$325,596.13	627	2,864	\$4.64	\$2,909.64	\$13,301.19	\$328,505.77	\$338,897.32
December	12,533	12,471	8,729	\$37.11	\$323,968.15	627	2,864	\$4.64	\$2,909.64	\$13,301.19	\$326,877.79	\$337,269.34
January	12,471	12,408	8,686	\$37.11	\$322,348.31	627	2,864	\$4.64	\$2,909.64	\$13,301.19	\$325,257.95	\$335,649.50
February	12,408	12,346	8,642	\$37.11	\$320,736.57	627	2,864	\$4.64	\$2,909.64	\$13,301.19	\$323,646.21	\$334,037.76
March	12,346	12,284	8,599	\$37.11	\$319,132.89	627	2,864	\$4.64	\$2,909.64	\$13,301.19	\$322,042.52	\$332,434.08
April	12,284	12,223	8,556	\$37.11	\$317,537.22	627	2,864	\$4.64	\$2,909.64	\$13,301.19	\$320,446.86	\$330,838.41
May	12,223	12,162	8,513	\$37.11	\$315,949.54	627	2,864	\$4.64	\$2,909.64	\$13,301.19	\$318,859.17	\$329,250.73
June	12,162	12,101	8,471	\$37.11	\$314,369.79	627	2,864	\$4.64	\$2,909.64	\$13,301.19	\$317,279.42	\$327,670.98
Total Estimated Affordability and Arrearage Forgiveness					\$3,878,441.20				\$34,915.63	\$159,614.29	\$3,913,356.83	\$4,038,055.49
Administrative Costs											\$195,667.84	\$201,902.77
Total Costs - GAP Automatic Enrollment											\$4,109,024.67	\$4,239,958.26

¹ Starting point is Actual LIHEAP Customers as of July 2024 as reported in Docket No. E,G-999/PR-24-2

² MERC assumed 0.5% customer removal rate from GAP each month starting in August (customer requests for removal and removals for nonpayment/customers who no longer qualify offset by newly qualified customers auto-enrolled on a rolling basis).

³ MERC estimated that 70% of all LIHEAP customers would qualify for GAP based on 2024 annual customer income and gas bills.

⁴ MERC assumed a monthly per-customer affordability credit based on the reported five-year average GAP affordability credits as reported in the Company's GAP annual report streamlined reporting (Attachment B).

⁵ MERC estimated the number of customers who may receive an arrearage forgiveness benefit based on this historical average of the percent of GAP customers and non-GAP LIHEAP customers with arrears. Over the past five years (2020-2024), 7% of GAP customers had arrears and 32% of non-GAP LIHEAP customers had arrears.

⁶ MERC estimated the monthly arrearage forgiveness credit per customer based on the five-year average (2020-2024) of \$55.73/year or \$4.64/month.

**Minnesota Energy Resources Corporation's Gas
Affordability Program 2024 Annual Report**

Docket No. G011/M-25-39

CERTIFICATE OF SERVICE

I, Kristin M. Stastny, hereby certify that on the 31st day of March, 2025, on behalf of Minnesota Energy Resources Corporation (MERC) I electronically filed a true and correct copy of the enclosed Annual Report on www.edockets.state.mn.us. Said documents were also served via U.S. mail and electronic service as designated on the attached service list.

Dated this 31st day of March, 2025.

/s/ Kristin M. Stastny

Kristin M. Stastny

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	M-25-39
2	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	M-25-39
3	Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 St. Paul MN, 55101 United States	Electronic Service		No	M-25-39
4	Ron	Elwood	relwood@mnlsap.org	Legal Services Advocacy Project		970 Raymond Avenue Suite G-40 Saint Paul MN, 55114 United States	Electronic Service		No	M-25-39
5	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	M-25-39
6	Joylyn C	Hoffman Malueg	joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources		2685 145th St W Rosemount MN, 55068 United States	Electronic Service		No	M-25-39
7	Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	M-25-39
8	Chris	Osowski	chris_osowski@usc.salvationarmy.org	Salvation Army		2080 Woodlynn Avenue Maplewood MN, 55109 United States	Electronic Service		No	M-25-39
9	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	M-25-39
10	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	M-25-39

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
---	------------	-----------	-------	--------------	--------	---------	-----------------	---------------------------	-------------------	-------------------