

July 5, 2024

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

**RE: Comments of the Minnesota Department of Commerce, Division of Energy Resources
Docket No. E002/M-24-173.**

Dear Mr. Seuffert:

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

Xcel Energy's Petition for an Automatic Bill Credit Pilot Program.

Xcel Energy filed a petition on April 26, 2024. The subsequent notice for comment is whether the Commission should approve Xcel Energy's new Automatic Bill Credit.

The Department generally supports Xcel's automatic bill credit pilot program but recommends Xcel provide more information about the appropriate credit threshold and proposed performance measures. Overall, the Department appreciates Xcel's and the Equity Stakeholder Advisory Groups efforts in developing this pilot program, and we agree this is a worthwhile pilot program.

Sincerely,

/s/ Dr. Sydnie Lieb
Assistant Commissioner of Regulatory Analysis

NC/MJ/DH/ad
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E002/M-24-173

I. INTRODUCTION

On April 26, 2024, the Commission filed a Notice for of Comment Period regarding Xcel's Petition for an Automatic Bill Credit Pilot Program (Notice).¹ The Commission invited comments on several items. Below is the full list of questions.

1. Does the proposed pilot meet the Commission's objectives for the Equity Stakeholder Advisory Group (ESAG)?²

Budget

2. Should the Commission approve a pilot budget of \$5.4 million per year, or \$10.8 million over the two years of the pilot?
3. Is it appropriate for Xcel Energy (Xcel or the Company) to absorb the administrative costs of delivering the pilot within its regular cost of doing business?
4. Is it appropriate for the pilot to be funded by Department of Energy (DOE) settlement payments, which have historically been dispersed across customer classes?

Method

5. Is the two-year time frame for the pilot sufficient?
6. Has Xcel chosen a valid method to calculate and map energy burden?
7. Is Xcel's chosen eligibility threshold of four percent (or greater) electric energy burden at the census block group (CBG)-level reasonable?

Bills

8. Has Xcel chosen a valid method to calculate monthly participant bill credits?
9. Is "layering" the pilot benefits on top of additional energy assistance appropriate?
10. Is Xcel's treatment of "over-inclusion," by including policies for opting-out and preventing negative bills, reasonable?
11. If funding using DOE funds is approved, should pilot participants still be eligible to receive a share of the remaining DOE refunds?

¹ Minnesota Public Utilities Commission, Notice of Comment Period, (April 26, 2024) (eDocket Nos. [20244-206037-01](#)).

² Xcel Energy, Initial Filing—Petition for an Automatic Bill Credit Pilot, (April 16, 2024) ((eDocket Nos. [20244-205898-01](#))).

Evaluation

12. Is it appropriate to engage a third-party evaluator to provide a pilot-specific Monitoring and Evaluation (M&E) plan?
 - a. What degree of oversight would the Commission and/or ESAG have over the M&E process, including the timeline of work and selection of evaluation metrics and deliverables?
 - a. How often should Xcel provide a progress report to the Commission and stakeholders?
 - b. Staff has issued an information request in the instant docket asking Xcel to estimate the costs associated with engaging a third-party evaluator. Given Xcel's estimate, are these costs reasonable?
13. Is it appropriate for Xcel to inform customers from ineligible CBGs about the automatic I hope you have a wbill credit pilot along with information about other energy assistance opportunities?
14. Are there other issues or concerns related to this matter?³

The Department submits these comments in response to the Commission's Notice.

II. PROCEDURAL CONTEXT

A. PETITION ORIGINATES FROM XCEL'S COMMUNITY STAKEHOLDER PROCESS

On April 16, 2024, Xcel filed a petition for a pilot program that would implement a geographically based automatic bill credit program (Petition).⁴ The Department, among other state agencies and nonprofits, participated in an Equity Stakeholder Advisory Group (ESAG), some of whose members signed Xcel's Petition as support for the pilot. In the pilot proposed in the Petition, a bill credit would be awarded to all households within a Census Block where the aggregate energy burden for all residences within the block meets or exceeds 4%.⁵ All households within the Census Block would receive the same credit amount for each month of the year. The credit amount per household is based on the amount needed to reduce the Census Block's electricity energy burden to 4%.

The idea originates from stakeholder meetings, which is an order from the Commission from Xcel's 2019 Integrated Resource Plan (IRP).⁶ The Equity Stakeholder Advisory Group (ESAG), is convened by Xcel and develops actions that promote equity-based actions related to reduce the burden to pay energy bills, improving diversity in the workforce, and adoption of renewable and energy efficiency measures. Xcel convenes a group of nonprofits and government agencies with expertise in the energy field, with connections to minority communities, and with oversight over energy assistance programs.⁷

³ Public Utilities Commission, Notice of Comment Period, (April 26, 2024) (eDocket Nos. [20244-206037-01](#)).

⁴ Xcel Energy, Initial Filing—Petition for an Automatic Bill Credit Pilot at 1-4 (April 16, 2024) ((eDocket Nos. [20244-205898-01](#)).

⁵ Xcel Energy, Initial Filing—Petition for an Automatic Bill Credit Pilot at 9-10 (April 16, 2024) ((eDocket Nos. [20244-205898-01](#)).

⁶ Minnesota Public Utilities Commission, order approving plan with modifications and establishing requirements for future filings at 39-40 (April 15, 2022) (eDocket No. E-002/RP-19-368) (Doc ID [20224-184828-01](#)).

⁷ Xcel Energy, Initial Filing—Petition for an Automatic Bill Credit Pilot, (April 16, 2024) ((eDocket Nos. [20244-205898-01](#)).

In review of the petition, the Commission filed its April 26, 2024, Notice of Comment Period, discussed in the above Introduction.⁸

B. COMMUNITY STAKEHOLDER PROCESS IS FROM XCEL'S 2019 INTEGRATED RESOURCE PLAN (IRP)

Authority for Xcel's ESAG originates from Xcel's 2019 IRP in Docket No. E-002/RP-19-368 (ESAG Order). The April 15, 2022, Order describes the Commission findings and notes that various parties and commenters asked Xcel to give greater focus to ensuring equitable treatment of all people, regardless of race, gender, or class. The Order states:

Xcel shall engage in community outreach and establish a stakeholder group to do the following:

- A. Design for the equitable delivery of electricity services and programs for energy- burdened customers in the company's next resource plan.
- B. Create new options to improve customer access to energy efficiency and renewable energy.
- C. Draft a plan to be submitted in Xcel's next resource plan to bring the racial and gender diversity of the company's workforce in line with the utility's stated goals.
- D. Design incentives to ensure that communities of low-income, Black, Indigenous, and People of Color that have disproportionately borne costs of unjust and inequitable energy decisions have equitable access to programs promoting distributed generation.
- E. Adopt practices in furtherance of procedural justice—including deeper engagement with renters; affordable rental property owners; communities of Black, Indigenous, and People of Color; and under-resourced individuals— providing resources for engagement and participation and providing financial support for impacted individuals to participate in dockets and decision-making processes.
- F. Form an environmental justice accountability board which shall develop environmental justice-focused initiatives to be incorporated throughout the utility.

By January 1, 2023, and annually thereafter, Xcel shall file details describing stakeholder outreach and progress in its next resource planning docket, and in a separate docket to be established by the Executive Secretary.

The Commission's Order included approval of Xcel's plan with modification.⁹

⁸ Minnesota Public Utilities Commission, Notice of Comment Period, (April 26, 2024) (eDocket Nos. [20244-206037-01](#)).

⁹ Minnesota Public Utilities Commission, order approving plan with modifications and establishing requirements for future filings at 30 (April 15, 2022) (eDocket No. E-002/RP-19-368) (Doc ID [20224-184828-01](#)).

III. BILL CREDIT EXPLAINED

Xcel proposes a 2-year pilot that would extend a bill credit to all customers within Census Block Groups (CBG) that carry an energy burden of 4% or more.

- Each customer within a Census Block group would receive a monthly credit equal to the expected amount needed to reduce the energy burden of a typical household to 4%. Under the proposal, Xcel would estimate the monthly energy burden as the percentage of a customer's annual electricity costs divided by the annual median income for the CBG, where the customers' electricity cost is the average dollars spent on electricity per month. Thus, the bill credit would be the same across every customer within the Census Block group, and it would be the same for every month.
- Census blocks serve as the boundaries for the geographic unit. They are the smallest geographical area designated by the Bureau of the Census.¹⁰

A. PILOT PROGRAM WOULD EVALUATE EFFECTIVENESS OF THE CREDIT

To get an idea of whether the credit will be effective, Xcel proposes to run a pilot program for two years. With the objective of reducing energy burden, bill credits would be delivered to individual customers within census blocks that qualify as having a higher energy burden. For this pilot program, Xcel proposes that higher energy burden is when electricity bills exceeds 4% of the typical income of a household within the block.

B. NOTES AND POTENTIAL ANOMOLIES WITH THE CREDIT

A few items are worth mention that make the credit an imperfect solution, albeit potentially one with benefits that exceed the costs, such as the benefit of getting assistance to those households who perhaps because of barriers do not complete an application for energy assistance.¹¹

Some persons benefitting from the credit may not have lower income—that is, the credit risks being overinclusive. The statistic provided by the Census is the median, which is the 50th percentile of income of persons within the group. That means some persons in some blocks may have very high

¹⁰ The Census designed the Blocks so that they could fit together to form a census tract. Both tracts and blocks are commonly used to identify smaller geographical areas, such as the State's Environmental Justice Areas. See information on [Census Block Groups](#). Downloaded On June 6, 2024., Customers' annual electricity costs come from premise data kept by Xcel. For each Census Block, all premises counted by Xcel fall within the boundary of the Census Block. Annual median income is collected by the Census for households within the tracts, where households proxy for customers.

¹¹ For examples of barriers, see Evaluation of the Energy Assistance Program by Sera Kinoglu and Julia Miller. Published in June 2022 by Wilder Research.

incomes. There might be some risk of perceived fairness for the credit. However, assistance provided in other areas, like Environmental Justice Areas may also include districts with high incomes.¹²

The burden calculation in the Petition only includes electricity but excludes natural gas and transportation costs.¹³

The threshold can result in customers not receiving the credit from one year to the next, Whenever the calculated electricity burden rises above 4%, the calculated Energy burden may increase, dependent upon migration of high-, or low-electricity consumers.

IV. DEPARTMENT ANALYSIS

The Department generally supports the efforts by the ESAG and Xcel regarding the proposal. The proposal is a creative and new approach.¹⁴ Such approaches do not have the benefit of years of experience from other utilities and multiple experiments from other regulated energy programs. However, the proposed pilot does address a priority in attempting to ensure that rates are equitable for low-income consumers, especially those that face barriers to enrollment in traditional energy assistance programs. Further work in this area may devise structures more focused on making it easier for low-income customers to receive assistance, especially among those unlikely to complete the necessary applications.

To ensure useful and reliable information for Commissioners, the Notice asked several questions, including whether a third-party vendor should evaluate the program, the degree of oversight of the evaluator, and reasonable expenses.

As noted earlier, the Department has findings and recommendations regarding some of the Commission's questions. In other cases, the Department has findings, but no recommendations.

¹² Also, there may be some persons in Census Block Groups with high energy burdens that would not receive the credit because the Block does not qualify. Persons with high energy burden in non-qualified blocks would have the same energy assistance opportunities as before the pilot.

¹³ For more information on the calculation of the energy burden, see "[High energy burden and low-income energy affordability: conclusions from a literature review](#)" by Marilyn A Brown et al, in Progress in Energy, published in 2020. For examples of use of the Energy Burden threshold, see the U.S. Department of Energy's [Low-Income Energy Affordability Database](#). Energy burden data (not electricity burden) are available at the Census tract level by the Department of Energy. Also, an effort to administer a bill credit that would include both electricity and natural gas customers within all of Xcel's service territory would involve coordinating the pilot across other utilities. Coordination may require agreements regarding the disclosure of private data to an agreed upon entity, rules about administration of the credit and other matters.

¹⁴ Xcel Energy, Initial Filing—Petition for an Automatic Bill Credit Pilot, (April 16, 2024) ((eDocket Nos. [20244-205898-01](#)).

A. *COMMISSION OBJECTIVES AND ESAG*

Among the topics for discussion by the Commission, the first on the list is:

1. *Does the proposed pilot meet the Commission's objectives for the Equity Stakeholder Advisory Group (ESAG)?*¹⁵

The ESAG Order included several objectives for the design of a program to meet equitable delivery of services for energy burdened customers. Xcel's proposal aims at relieving lower-income customers strapped with higher energy burdens that may be less likely to participate in other energy assistance benefits. As noted below, at least some of these customers may experience barriers to enrolling in assistance programs. The bill credit could lower a customer's energy burden from what it otherwise would have been.

The proposed pilot makes important steps, but it is not yet known whether Xcel has designed for the delivery of services. The purpose of the pilot is to see if the program is successful in partially achieving this goal. In addition to time needed to reach this goal, more structure on the limits to an equitable delivery of services would be helpful. Such an effort is ongoing, and effects of any efforts will take time. Also, the ESAG has proposed other efforts related to workforce development, energy efficiency and renewable energy. Xcel further has plans to form an Environmental Justice Board, which may be the vehicle to continue carrying out the efforts regarding the equitable delivery of services. Right now, it is too early to say. Consequently, the Department recommends the Commission require continued monitoring of Xcel's efforts to implement the recommendations from the Equity Stakeholder Group and in monitoring efforts from the Environmental Justice Board.

B. *BUDGET*

The Notice included the following three questions regarding Xcel's proposed budget for the pilot:

1. *Should the Commission approve a pilot budget of \$5.4 million per year, or \$10.8 million over the two years of the pilot?*
2. *Is it appropriate for Xcel Energy (Xcel or the Company) to absorb the administrative costs of delivering the pilot within its regular cost of doing business?*
3. *Is it appropriate for the pilot to be funded by Department of Energy (DOE) settlement payments, which have historically been dispersed across customer classes?*¹⁶

¹⁵ Minnesota Public Utilities Commission, Notice of Comment Period at 39-40 (April 26, 2024) (eDocket Nos. [20244-206037-01](#)).

¹⁶ Minnesota Public Utilities Commission, Notice of Comment Period, (April 26, 2024) (eDocket Nos. [20244-206037-01](#)).

1. *Pilot Budget*

Xcel proposes a two-year pilot that would provide annual bill credits to about 23,000 households in 77 eligible CBGs, based on a threshold of 4 percent.¹⁷ The annual bill credits would vary by CBG, with the average being about \$458 annually per premise. Xcel estimated the total cost of the program to be approximately \$5.4 million annually, or \$10.8 million in total over the proposed two-year pilot.¹⁸

The Department reviewed Xcel's calculations and proposed pilot costs and concludes they appear reasonable. As a result, the Department recommends that the Commission approve Xcel's proposed budget of \$5.4 million annually or \$10.8 million over the proposed two-year pilot.

2. *Administrative Costs*

Xcel proposes to absorb the administrative cost for running the pilot within their regular cost of business.¹⁹ These costs include updating the geospatial analysis, calculations, developing the list of premise numbers to receive a bill credits, scheduling those bill credits in their billing system, administering the opt-out function, and customer outreach. In addition, Xcel stated that if the pilot program transitioned into a permanent program offering, it would track administrative costs separately, consistent with their other energy assistance programs.

Regarding third-party monitoring and evaluation (M&E) costs, Xcel proposes to conduct a competitive solicitation to select a third-party evaluator and stated that it would seek to recover M&E costs as part of the overall pilot.²⁰

The Department appreciates Xcel's proposal to absorb the administrative costs as part of its regular business and recommends Commission approval. With regards to M&E costs, Commission asked Xcel, in MPU IR No. 3, to provide an estimate of costs associated with engaging a third-party evaluator.²¹ Xcel replied:

the Company has experience conducting Requests for Proposal for third-party monitoring and evaluation (M&E) of pilot programs in energy efficiency, new electric rates, electric vehicle programs, and other areas. Based on that experience, we anticipate costs in the ballpark of \$400,000 if the expectation is – as we believe it should be – to work with the third-party evaluator throughout the duration of the pilot. We believe that the estimated cost of M&E, at less than 4 percent of the estimated cost of bill credits, is reasonable for a pilot of this scale.

¹⁷ Xcel Energy, Initial Filing—Petition for an Automatic Bill Credit Pilot at 17, (April 16, 2024) ((eDocket Nos. [20244-205898-01](#))).

¹⁸ *Ibid.*

¹⁹ *Ibid.*

²⁰ *Ibid.*

²¹ Per Xcel's Response to MPU IR No. 3; see DOC Attachment No. 1 to these comments.

This work would begin with development of an M&E plan and metrics, with research designed to measure the objectives designated in the final order through primary and secondary data collection at the appropriate points in the process. Engaging with ESAG member organizations at the conclusion of the planning stage (prior to any data collection) is likely, but we expect that the most cost-effective approach will rely on deference to the third-party evaluator's expertise on survey design and sample development. The company will use the Request for Proposal process to contain costs, but considering the innovations being explored in this pilot, M&E needs to take a robust and thorough approach; we believe the cost estimate above is likely accurate. The Company plans to seek recovery of third-party M&E costs.

The Department notes that Xcel's estimated of annual M&E costs of \$400,000 amounts to 3.7% of the total estimated costs of bill credits.²² The Department agrees with Xcel that this level of M&E costs appear reasonable for a pilot of this scale and recommends Commission approval.

3. DOE Settlement for Pilot Funding

The Company notes that it considered various existing possible cost recovery mechanisms for the pilot including existing energy assistance programs such as PowerON, the Medical Affordability program, and the Low-Income Low Usage (LILU) discount, which are all funded via the Low-Income Energy Discount Rider.²³ In addition, Xcel stated:

Adding the estimated \$5.4 million annual cost of automated bill credits to the Low-Income Energy Discount Rider is perhaps not ideal, especially if one considers that the surcharge would (even if only slightly) increase the monthly bill of all customers – including some low-income customers not receiving any form of assistance. That could include customers who themselves have electric energy burden above 4 percent but happen to live in a CBG that does not exceed this threshold, so does not qualify for the Automatic Bill Credit. Recovering the cost of the Automatic Bill Credit via the Low-Income Energy Discount Rider would result in those customers paying a slightly higher energy bill while not receiving the Automatic Bill Credit. Considering this, the Company sought a different mechanism to fund the Automatic Bill Credit Pilot.

²² \$400,000/\$10,800,000 = 3.7%

²³ Xcel Energy, Initial Filing—Petition for an Automatic Bill Credit Pilot at 17, (April 16, 2024) ((eDocket Nos. [20244-205898-01](#)).

We propose to recover the cost of the pilot using a portion of the U.S. Department of Energy (DOE) annual settlement payments related to the U.S. Government's failure to create a long-term nuclear waste repository. As background, the Nuclear Waste Policy Act committed the DOE to take title to, transport, and dispose of spent fuel from the nation's nuclear power plants beginning no later than January 31, 1998. The DOE has not accepted any spent nuclear fuel to date. In 1998, the Company filed the first of two lawsuits against DOE, seeking to recover damages associated with storage of spent nuclear fuel at our Prairie Island and Monticello nuclear generating plants. The Company reached a settlement agreement with the U.S. Government on these lawsuits in 2011, providing a mechanism for the Company to recover its spent nuclear fuel storage damages. That agreement has been extended several times since then, and each year the DOE has made a settlement payment under the agreement. The Company has generally sought approval of a credit mechanism to return the settlement amounts to customers. For example, in the case of the most recent payment – DOE #14, for \$16.8 million, received in November 2023 – we proposed returning the Minnesota-jurisdictional portion of the payment to our Minnesota electric customers as part of the 2022 Multiyear Rate Plan true-up refunds.

We propose to recover the costs of this two-year pilot using a portion of the Minnesota-jurisdictional share of DOE settlement payments #15 and #16. Based on prior years, those payments are likely to be made in the fourth quarter of 2024 and fourth quarter of 2025. This timing will coincide well with beginning to deliver Automatic Bill Credits in early 2025, should the Commission approve our proposal.²⁴

The Department notes that past Xcel's DOE Settlement payments have been returned to all of Xcel's ratepayers via general rate case or more recently through one-time refunds. The Department has supported this practice on the grounds that all ratepayers pay for the associated nuclear costs, specifically fuel cost storage, included in Xcel's base rates. Therefore, the costs for the pilot will be borne by Xcel's ratepayers one way or another. Moreover, the Department agrees with Xcel that recovering the cost of the Automatic Bill Credit via the Low-Income Energy Discount Rider would increase the bill to all customers, including some low-income customers who themselves have electric energy burden above four percent, but happen to live in a CBG that does not exceed this threshold, and therefore do not qualify for the Automatic Bill Credit. As a result, the Department supports Xcel's proposal to fund the two-year pilot using a portion of the Minnesota-jurisdictional share of the DOE settlement payments #15 and #16 and therefore recommends approval.

²⁴ *Ibid.*

C. *METHODS ARE MOSTLY REASONABLE*

The Notice states three questions regarding the method that was described by Xcel.

1. *Is the two-year time frame for the pilot sufficient?*
2. *Has Xcel chosen a valid method to calculate and map energy burden?*
3. *Is Xcel's chosen eligibility threshold of four percent (or greater) electric energy burden at the census block group (CBG)-level reasonable?*²⁵

1. *Two-Year Time Frame*

The Department generally agrees with the two-year time frame but makes two recommendations to help ensure more reliable information from the forthcoming evaluations. First, the Department recommends that the Commission reserves the option to extend the pilot to five years, assuming evidence supports the continuation of this pilot program. Another three years will allow the Commission to gather further data and information in case the Commission still has significant uncertainty about the pilot. Second, the Department requests that Xcel gather two years of historical data prior to the beginning of the credit, whenever possible. In this case historical data only pertains to performance measures that can be constructed from Xcel's existing databases.

2. *Energy Burden Metric*

Calculation of energy burden is typically the ratio of energy expenditures to income (or household budget). Xcel's approach does not exactly use this ratio, as noted above. But, given limitations outside of the control of Xcel and the ESAG group, Xcel's calculation is reasonable.

Xcel provides a bill credit based upon electricity burden and not the broader statistic of energy burden.²⁶ However, the ESAG group arose from the Commission's Order overseeing Xcel's IRP for electricity.²⁷ Xcel's service territory for electricity does not coincide with the Company's service territory for natural gas. Instead, Xcel would need to jointly design for the equitable delivery of service with other utilities, which would be out of scope of the original order.

The Department further notes that the use of median income is not ideal. Generally income represents the dollars available to spend on energy and other expenditures. It would ideally include items like after tax income, cash assistance such as MFIP, child support payments, and the value of in-kind benefits. However, such data is not available, and Xcel reasonably chooses the best available alternative at the Census Block level, which is median income.²⁸

²⁵ Minnesota Public Utilities Commission, Notice of Comment Period, (April 26, 2024) (eDocket Nos. [20244-206037-01](#)).

²⁶ See the discussion in "[High energy burden and low-income energy affordability: conclusions from a literature review](#)" by Marilyn A Brown et al, in *Progress in Energy*, published in 2020.

²⁷ Minnesota Public Utilities Commission, order approving plan with modifications and establishing requirements for future filings at 39-40 (April 15, 2022) (eDocket No. E-002/RP-19-368) (Doc ID [20224-184828-01](#)).

²⁸ A commonly used source of data for median income at the Census Block Group level is the American Community Survey. ... see definition of Money Income. Examples of other data include Individual income tax data held by the Minnesota Department of Revenue, and wage detail data held by the Minnesota Department of Employment and Economic Development. Both of these agencies would require a data sharing agreement, or authorization in law.

Using electricity burden as a threshold is reasonable in the end. Triggering assistance at higher percentages of electricity burden makes some sense. At low-income levels, households tend to spend higher percentages of their available income on necessities, like energy, food, housing, and health care. As income drops the percentages of available income needed to pay for electricity and other necessities tend to increase. Barring enough low-income assistance from governments and non-profits, the sum of those percentages spent on energy and other necessities may approach 100% or more of the household's budget.

The Department also does not object to the use of Census Block Groups. If Xcel had access to individual customer data, it could identify only those customers with a high energy burden. But because reliable data may not be publicly available, aggregated income data may be the next best measure. Because Census Block Groups are the smallest unit produced by the Census, it is a reasonably tight unit of data.²⁹ Block groups approximate a single block in a neighborhood and can resultantly approximate blocks mostly populated by high-energy-burden households. Conversely, it can better filter out blocks that are exclusively low-energy burden households.

Based on the Department's review, we support Xcel's use of the Census Block Groups for purposes of this two-year pilot program.

3. *4% Threshold*

Whether a 4% is energy burden threshold is reasonable is somewhat subjective. Xcel is correct that some suggest that 6% represents a high energy burden.³⁰ Because energy burden includes both electricity and natural gas, it would be expected that a high energy burden for electricity would be lower than 6%. The Department notes that in Minnesota Gas Affordability Programs the energy burden tends to be capped at 3 to 4 percent for gas only.

Accordingly, the Department supports the 4% threshold proposed by Xcel. However, we believe it would helpful for Xcel to produce an up-to-date table listing the number of eligible customers, average bill credit amount, total bill credit dollar, and poverty rates for electricity burdens at 3%, 4%, and 5% for the Commission's consideration. The Department notes limiting the number of customers in the pilot may allow Xcel to gather more detailed information on the customers receiving the automatic bill credit, and possible changes to improve this program after the two-year pilot.

²⁹ Census information on [Block Groups](#). Downloaded On June 6, 2024.

³⁰ Examples include, " [What is an Energy Burden](#)" by the Empowerment Gant. Downloaded on June 5, 2024. "[High energy burden and low-income energy affordability: conclusions from a literature review](#)" by Marilyn A Brown et al, in Progress in Energy, published in 2020. Xcel Energy, Initial Filing—Petition for an Automatic Bill Credit Pilot at 6 (April 16, 2024) ((eDocket Nos. [20244-205898-01](#))).

D. BILLS

The Notice included the following questions regarding Xcel's proposed billing for the pilot:

- 1. Has Xcel chosen a valid method to calculate monthly participant bill credits?*
- 2. Is "layering" the pilot benefits on top of additional energy assistance appropriate?*
- 3. Is Xcel's treatment of "over-inclusion," by including policies for opting out and preventing negative bills, reasonable?*
- 4. If funding using DOE funds is approved, should pilot participants still be eligible to receive a share of the remaining DOE refunds?*

1. Method for calculating Bill Credits

The Commission's Notice also raised the question of whether Xcel chose a valid method for calculating bill credits.

Xcel states that after choosing the metric and threshold to determine eligible CBGs, it needed to determine the size of the bill credit that households in each eligible CBG would receive.³¹ Xcel states that the objective of a bill credit was to reduce the electric energy burden for households to no more than 4% of median household income in each eligible CBG.³² In addition, Xcel states:

Because a key goal of the pilot is to test eliminating income qualification, the pilot will collect no household-specific income information. This means the bill credit cannot be calculated as the amount needed to reduce a specific household's electric energy burden to the threshold – as is done in Xcel Energy's PowerON program and other programs that require household-specific income qualification – but rather a more generalized, CBG-level target. We calculated a target annual electric bill for each qualifying CBG by multiplying median household income for the CBG by 4 percent.

Calculating the bill credit needed in each CBG is then simply a matter of subtracting the target annual electric bill from the average annual electricity cost per premise, both calculated at the CBG level. This difference equals the bill credit that must be provided to ensure the median-income household in that CBG pays only 4 percent of its income for electricity. The bill credit will differ from one CBG to the next, since it is based on CBG-specific median household income but will be the same for all households in a given CBG.³³

³¹ Xcel Energy, Initial Filing—Petition for an Automatic Bill Credit Pilot at 8-9 (April 16, 2024) ((eDocket Nos. [20244-205898-01](#))).

³² Xcel Energy, Initial Filing—Petition for an Automatic Bill Credit Pilot at 9-10 (April 16, 2024) (eDocket [20244-205898-01](#)).

³³ Xcel Energy, Initial Filing—Petition for an Automatic Bill Credit Pilot at 10 (April 16, 2024) (eDocket [20244-205898-01](#)).

Beginning on page 15 of the Petition, Xcel provides a hypothetical household example of how the bill credit works to aid in the understanding of the pilot.

The Department reviewed Xcel's proposed method for calculating bill credits along with the hypothetical household example and concludes they appear reasonable.

2. Layering of Pilot Benefits

Xcel originally raised this question in its petition noting that other energy related assistance is available to customers. Assistance directly related to reducing the energy burden in the immediate term include the Low-Income Energy Assistance Program (LIHEAP), PowerOn, Medical Affordability Program, and the Low-Usage Affordability credit.

Partly at issue is that not everyone eligible for the above energy assistance programs, and additionally may not have the time to complete applications for enrollment. At least in the case of the LIHEAP benefit, a study by Wilder Research notes there may be challenges for some individuals to complete the application, such as comprehending complex language necessary to understand the application and gathering the necessary paperwork (e.g., income documentation). Also, households applying for EAP are sometimes in crisis or experiencing financial hardship, and as a result, are under extreme stress.³⁴ Furthermore, as a precondition for eligibility for PowerOn and the Low Usage Affordability credit, customers must be participating in the LIHEAP program. This requirement disqualifies persons that do not receive the benefit.

Another issue is as whether the grant will result in more electricity usage and disqualify person for the Low-Income Low Usage program credit, or, whether the credit independently, or in combination with other benefits will result in a negative bill. Xcel resolves this issue by proposing to limit the automatic bill credit to go to zero and not negative. The Department supports this reasonable limitation.

The Department notes that if an Xcel customer receiving the automatic bill credit applies for LIHEAP and is determined eligible, the automatic bill credit received would not impact their LIHEAP grant. As a result, the Department does not consider the layering of benefits to be a concern, since it will not negative impact low-income customers.

³⁴ *Evaluation of the Energy Assistance Program* by Sera Kinoglu and Julia Miller. Published in June 2022 by Wilder Research.

3. *Remaining DOE Refunds*

The Commission's notice asked parties to address whether Xcel's treatment of "over-inclusion" by including policies for opting out and preventing negative bills was reasonable. Xcel stated the following regarding over-inclusion:

Household incomes and energy burden vary within any CBG. Under this pilot, within qualifying CBGs there will be households with lower electric energy burden than the targeted threshold of 4 percent, who will still receive a bill credit. We refer to this using the shorthand "over-inclusion," so as not to imply anything about households' degree of need for assistance. Similarly, within CBGs that do not qualify for the pilot – because CBG-level median incomes are higher and energy burden lower – there could be households with electric energy burden exceeding 4 percent who will not receive a bill credit. The only way to avoid any over- or under-inclusion would be to go back to household-specific income data collection. But this would reintroduce potentially onerous enrollment requirements that have acted as a barrier to many families seeking assistance for which they are eligible.

We discussed at length with ESAG the pros and cons of allowing over-inclusion. The consensus of ESAG was that for the purposes of an initial pilot, the degree of overinclusion is likely small, and advantages of allowing a small amount of over-inclusion outweigh the disadvantages of having to identify, enroll, and verify income by household. ESAG members advanced various arguments for this. First, some households that receive a bill credit despite having actual electric energy burden below 4 percent might still be living in or near poverty. Helping households with income slightly above the poverty level may help prevent them from slipping into poverty, which is more cost-effective than addressing poverty after it occurs. Second, supporting mixed-wealth living may provide a net societal benefit by reducing transience, improving social cohesion, and supporting community stability. Third, providing a bill credit to an entire CBG rather than only selected households may be viewed as a community-level investment, where everyone in the community benefits. Fourth, balancing a program's design and/or reach with its administrative costs is a key challenge for any assistance program, and a key strength of this proposed pilot is low administrative costs. Household-by-household income verification, while it could avoid over-inclusion, entails significant administrative costs for utilities and supervisory agencies (aside from its time burden on recipients), and the administrative cost savings of eliminating those requirements will offset at least some of the costs of

providing a bill credit to some households who would be ineligible in a household-by-household approach.

Finally, ESAG members noted that tolerance for “over-inclusion” is not without precedent in utility programs. For example, some multifamily building energy efficiency programs intended to help low-income customers require a minimum percentage of the building tenants to be low-income, but the improvements to the building also reduce bills for tenants who are not low-income. Considering all this, ESAG’s recommendation was to begin with the simplest approach: provide a bill credit to all households in qualifying CBGs without attempting to eliminate over-inclusion. This would enable the pilot to get started, monitor success, and evolve over time. ESAG, however, suggested that the pilot should provide an “opt-out” option so that, for example, a wealthier household located within an overall high energy burden CBG could decline the bill credit if they choose. ESAG members felt this granted individual households the dignity to decide for themselves whether they wanted the bill credit.

ESAG also suggested that once the advantages of a simple approach have been explored in the pilot, the Company could consider gradually reintroducing more targeted, household-specific income checks, as long as this could be done without overly increasing enrollment barriers or administrative costs. This is discussed further in section II.K.³⁵

The Department generally agrees with the concerns raised by ESAG but emphasizes that that both over-inclusion and under-inclusion will likely occur. In addition, the Department agrees that for the purposes of an initial pilot, the degree of overinclusion is likely small, and advantages of allowing a small amount of overinclusion outweigh the disadvantages of having to identify, enroll, and verify income by household. Finally, the Department agrees that an opt-out option and the future introduction of more targeted, household-specific income checks could mitigate this issue going forward.

1. Remaining DOE Refunds

participants should still be eligible to receive a share of the remaining DOE refunds. Xcel proposed to return the remaining portions of DOE Settlement payments to all ratepayers, consistent with past practices.³⁶ The Department notes agrees with this approach and sees no need to deny customers receiving the Automatic Bill Credit their share of remaining DOE settlement payments. As a result, the Department recommends the Commission approve Xcel’s proposal to share the remaining DOE refunds with all ratepayers, including pilot participants.

³⁵ Xcel Energy, Initial Filing—Petition for an Automatic Bill Credit Pilot at 10-11 (April 16, 2024) (eDocket [20244-205898-01](#)).

³⁶ Xcel Energy, Initial Filing—Petition for an Automatic Bill Credit Pilot at 19 (April 16, 2024) (eDocket [20244-205898-01](#)).

E. EVALUATION TOPICS

The Commission asked the following questions regarding evaluating of the bill credit program:

- 1. Is it appropriate to engage a third-party evaluator to provide a pilot-specific Monitoring and Evaluation (M&E) plan?*
 - a. What degree of oversight would the Commission and/or ESAG have over the M&E process, including the timeline of work and selection of evaluation metrics and deliverables?*
 - b. How often should Xcel provide a progress report to the Commission and stakeholders?*
 - c. Staff has issued an information request in the instant docket asking Xcel to estimate the costs associated with engaging a third-party evaluator. Given Xcel's estimate, are these costs reasonable?*
- 2. Is it appropriate for Xcel to inform customers from ineligible CBGs about the automatic bill credit pilot along with information about other energy assistance opportunities?*
- 3. Are there other issues or concerns related to this matter?*

1. Appropriateness of a Third-party Evaluator.³⁷

The Department has no opinion on whether a third-party evaluator should be used, but rather asks the Commission to consider who will ultimately pay for the expense.

2. Oversight and Performance Measures

As part of an evaluation, predetermined outcomes can help gauge the program's success. Such predetermined outcomes can provide objective information to the Commission on how well the pilot achieves its goals. By predetermining the outcomes, the Commission can help avoid confirmation bias. That bias may unintentionally occur when all metrics are chosen after the study. However, not all metrics must be determined before the beginning of the study. Unexpected outcomes may be important to report in case the outcomes would affect the Commission's opinions of the program.

The Department recommends the reporting of the following general outcomes. By general, the Department notes the outcomes represent a goal, and do not refer to specific quantifiable measures or units. The Department will recommend specific quantifiable measures in the next section, but if the specific measures are unavailable, the Department recommends that the evaluator refer to these outcomes,.

- Energy credit dollars – To help evaluate the difference that the credit makes, measures will be proposed to understand the impact on the customer's electricity payments.

³⁷ Minnesota Public Utilities Commission, Notice of Comment Period, (April 26, 2024) (eDocket Nos. [20244-206037-01](#)).

- Associated benefits from the credit, such as reduced chances that a customer will not pay their bill—Lower bills and resultantly more dollars in the pockets of residents means more ability for residents to pay for expenses, such as in fully paying monthly electricity bills.
- Participation in and impacts on other energy assistance programs—the bill credit may impact other energy assistance benefits. For example, some customers may substitute the automatic bill credit for the work needed to apply for the low-usage credit, or the weatherization program. Tracking such benefits may help better understand the effects of the program.

Specific measures will be listed in the recommendations section.

3. Frequency of Reports

As noted above, Xcel's estimated M&E costs of \$400,000 amounts to 3.7% of the total estimated costs of bill credits.³⁸ The Department agrees with Xcel that this level of M&E costs appear reasonable for a pilot of this scale.

4. Information About the Credit and Other Benefits

Consistent information about the automatic bill credit and information about other energy assistance programs help customer's make rational decisions that meets their priorities. Full and accurate information about the benefits and risks to the bill credit will avoid misleading the customer. Customer knowledge about how many dollars there are to gain from the bill credit and any consequences of accepting the credit should help in fairness and avoid irrational outcomes. For example, if layering is disallowed, then some customers may be frustrated being unable layer other energy assistance benefits if they accept the credit.

The level of available information should include what Xcel expects to deliver over the long run. Advertising, flyers and notices on grocery bags may have important public benefits, including benefits from providing information in languages other than English. Furthermore, outreach by the community groups might be very helpful.

To test effectiveness of outreach efforts during the pilot, Xcel could divide the Census Block groups into groups that receive more information, and groups that do not receive any information. The evaluator could then compare the performance between the information levels and gain some idea of the benefits to the communities and to Xcel.

5. Other Issues or Concerns

The Department is not aware of any other issues or concerns related to this matter.

³⁸ See the discussion of Administrative costs within the Budget section above. pp. 8-9

V. DEPARTMENT RECOMMENDATIONS

Based upon our analysis above, the Department compiled a list of recommendations regarding Xcel's petition. Because of the number of recommendations, the list below is organized by the topic heading to the list of questions opened for comment by the Commission.

For each of the topics below, the Department recommends that the Commission:

A. OVERALL

- find the proposed pilot meets the Commission's objectives for the Equity Stakeholder Advisory Group (ESAG);
- require continued monitoring of Xcel's efforts to implement the recommendations from the Equity Stakeholder Group and in monitoring efforts from the Environmental Justice Board;

B. BUDGET

The Department recommends the Commission

- approve Xcel's proposed budget of \$5.4 million annually or \$10.8 million over the proposed two-year pilot;
- approve Xcel's proposed annual budget of \$400,000 in monitoring and evaluation costs
- approved Xcel's proposal to fund the pilot using a portion of the Minnesota-jurisdictional share of DOE settlement payments #15 and #16;

C. METHOD

- approve the proposed two-year timeframe but consider an option to extend the pilot to five years;
- require Xcel to report two-years of historical data on the performance measures below. If data is unavailable, the Company should report why it does not keep this performance data for two years. The data should correspond to the semi-annual reporting periods in the pilot. The data should be such that enough information is provided to calculate the performance measures on an annual basis.
- The Department requests that Xcel provide in reply comments an up-to-date table listing the number of eligible customers, average bill credit amount, total bill credit dollar, and poverty rates for electricity burdens at 2%, 3%, 4%, and 5% for the Commission's consideration.
- conclude Xcel's method for calculating and mapping electric energy burden is valid but consider adding higher poverty rates as a second criteria to help minimize the risk that the credit is awarded to higher-income neighborhoods;

D. BILLS

- conclude Xcel's proposed method for calculating bill credits is reasonable;
- layering" the pilot benefits on top of additional energy assistance is appropriate;
- Find that for the purposes of an initial pilot, over-inclusion and under-inclusion is likely small and the advantages outweigh the disadvantages of having to identify, enroll, income by household;
- approve Xcel's proposed opt-out option and the future introduction of more targeted, household-specific income checks could mitigate this issue going forward;
- approve Xcel's proposal to share the remaining DOE refunds with all ratepayers, including pilot participants;

E. EVALUATION

- The Department has no opinion on whether a third-party evaluator should be used, but to consider who will ultimately pay for the expense. Without inappropriately sacrificing the quality of the evaluation, the Department would suggest the Commission search for ways to save on expenses;
- require Xcel to provide the following metrics/statistics:
 - Average bill credit amount
 - Total Bill credits dollars
 - Missing payments
 - Disconnections
 - Arrearages
 - Participation rates and amount of assistance for other energy assistance programs
 - Participant billing impacts (e.g., percentage reduction in customer's bill.)
 - Number or percentages of customers that Opt-out of credit.
- The above statistics should be reported semi-annually Starting from the two-years prior to the pilot (given data are available)) until the end of the pilot period. The data should also include annual estimates.
- require Xcel to provide semi-annual updates on its recommended performance measures and an annual report by the evaluator during the years of the pilot.
- approve Xcel's proposed annual budget of \$400,000 in monitoring and evaluation (M&E) costs;

These recommendations conclude the Department's comments.

- ☐ Not-Public Document – Not For Public Disclosure
☐ Public Document – Not-Public Data Has Been Excised
☒ Public Document

Xcel Energy

Information Request No.

3

Docket No.: E002/M-24-173

Response To: Minnesota Public Utilities Commission

Requestor: Tera Dornfeld

Date Received: April 26, 2024

Question:

What are the estimated costs associated with engaging a third-party evaluator?

Response:

The Company has experience conducting Requests for Proposal for third-party monitoring and evaluation (M&E) of pilot programs in energy efficiency, new electric rates, electric vehicle programs, and other areas. Based on that experience, we anticipate costs in the ballpark of \$400,000 if the expectation is – as we believe it should be – to work with the third-party evaluator throughout the duration of the pilot. We believe that the estimated cost of M&E, at less than 4 percent of the estimated cost of bill credits, is reasonable for a pilot of this scale.

This work would begin with development of an M&E plan and metrics, with research designed to measure the objectives designated in the final order through primary and secondary data collection at the appropriate points in the process. Engaging with ESAG member organizations at the conclusion of the planning stage (prior to any data collection) is likely, but we expect that the most cost-effective approach will rely on deference to the third-party evaluator's expertise on survey design and sample development. The company will use the Request for Proposal process to contain costs, but considering the innovations being explored in this pilot, M&E needs to take a robust and thorough approach; we believe the cost estimate above is likely accurate. The Company plans to seek recovery of third-party M&E costs.

Preparer: Nicholas Minderman

Title: Regulatory Policy Specialist

Department: Program Policy & Strategy

Telephone: (612) 330-6362

Date: May 9, 2024

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. E002/M-24-173

Dated this 5th day of **July 2024**

/s/Sharon Ferguson

[illegible]

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.	11 East Superior St Ste 125 Duluth, MN 55802	Electronic Service	No	OFF_SL_24-173_M-24-173
Stacey	Karels	skarels@local563.org	Mankato Area Bldg & Construction Trades Council	310 McKinzie St Mankato, MN 56001	Electronic Service	No	OFF_SL_24-173_M-24-173

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-173_M-24-173
Kay	Kuhlmann	Teri.Swanson@ci.red-wing.mn.us	City Of Red Wing	315 West Fourth Street Red Wing, MN 55066	Electronic Service	No	OFF_SL_24-173_M-24-173
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_24-173_M-24-173

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Matthew	Lacey	MLacey@grenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_24-173_M-24-173
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Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello	505 Walnut St Ste 1 Monticello, MN 55362	Electronic Service	No	OFF_SL_24-173_M-24-173
Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_24-173_M-24-173

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance	570 Asbury St. St. Paul, MN 55104	Electronic Service	No	OFF_SL_24-173_M-24-173
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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