

STATE OF MINNESOTA
BEFORE THE PUBLIC UTILITIES COMMISSION

Nancy Lange	Chair
Dan Lipschultz	Commissioner
Matt Schuerger	Commissioner
Katie Sieben	Commissioner
John Tuma	Commissioner

In the Matter of Xcel's Residential Time of
Use Rate Design Pilot Program

MPUC DOCKET NO. E002/M-17-775

**ANSWER OF THE
SUBURBAN RATE AUTHORITY TO
THE ATTORNEY GENERAL'S
PETITION FOR RECONSIDERATION**

ANSWER

The Suburban Rate Authority ("SRA") supports the Attorney General's ("OAG") Petition for Reconsideration filed on August 27, 2018. The SRA acknowledges that this answer is late.¹ The SRA respectfully requests leave to submit this answer on the grounds that Commission consideration of the Petition will not be delayed by these short comments on the important subject of low income customers and TOU goals.

The SRA has a member² that is the site of one of the two TOU test areas. The City, and all SRA members, have low income residents and have a high interest in the overall success of the TOU, the data it collects and the fair opportunity it affords potential participants of all income strata and household situation.

The OAG articulates multiple, good reasons to broaden the scope of bill protections to include self-identified low income TOU participants outside the LIHEAP program, known to include only thirty percent of customers deemed income eligible for bill protection in the pilot.³

¹ Minn. R. 7829.3000, subp. 4.

² City of Eden Prairie.

³ Petition at 3.

While Xcel's TOU pilot is well-designed and now has Commission approval, Xcel must complete many key TOU plan details, and has time for plan completion and refinement before its selected TOU implementation in 2020.

The SRA will not repeat the OAG's points and authorities. The TOU's limited participant size and defined areas present a preferable, even ideal context to test the self-identification method of expanding the scope of assistance to low income customers to engage in active electricity use conservation measures. Further, there is reason to believe that if TOU is successful and expanded to all Xcel residential customers the same dilemma will face Xcel and the Commission at that time, i.e. LIHEAP will not represent even half of all low income customers and many equally low income Xcel customers will not choose to participate in TOU for fear of higher bills.⁴ The SRA believes that all income levels of residential customers will benefit from more prudent electricity use. It also recognizes and supports the programs and strategies approved by the Commission that assist low income households in achieving greater participation levels, albeit at additional, modest cost shared by other customers.

The OAG's self-identification proposal is worth utilizing in this TOU pilot, prior to the anticipated system-wide offering of TOU pricing. This is the time to examine the success, or failure, of a self-identification strategy to include more low income customers in an important conservation pilot. The SRA urges the Commission to reconsider the Petition and add self-identification to the enrollment process under the "otherwise persuaded" basis for reconsideration of its earlier order.⁵

⁴ The SRA assumes, however, that TOU notices to potential participants will provide information on LIHEAP eligibility and the additional bill protection that is available in the TOU, thereby increasing LIHEAP enrollment in the limited TOU test areas.

⁵ *In the Matter of Detailing Criteria and Standards for Measuring an Electric Utility's Good Faith Efforts in Meeting the Renewable Energy Objectives Under Minn. Stat. § 216B.1691*, Order After Reconsideration at 9, Docket No. E999/CI-03-869 (Aug. 13, 2004).

Respectfully submitted,

Dated: September 14, 2018

KENNEDY & GRAVEN, CHARTERED

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