



November 4, 2024

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

**VIA E-FILING**

**Re:**

**In the Matter of Northern States Power  
Company d/b/a Xcel Energy's 2023 Annual  
Safety, Reliability, and Service Quality  
Report**

**MPUC Docket No.  
E-002/M-24-27**

Dear Mr. Seuffert:

The Citizens Utility Board of Minnesota ("CUB") and the Energy CENTS Coalition ("ECC," collectively, the "Joint Commenters") respectfully submit the following Decision Options and clarifications in recognition of the upcoming hearing on the above-referenced matter.

Several aspects of the Agreement between the Joint Commenters and Xcel do not necessarily require Commission action to take effect. The Commission recognized in its E,G-999/CI-20-375 and E,G-999/PR-YR-02 hearing earlier this year that certain changes to utility policies do not require affirmative approval so long as the relevant practices remain compliant with applicable statutes, rules, and Commission Orders. We believe this applies to Decision Options 12, 19, 23, 24, 25, and 26. Ordering those changes to take effect would nonetheless establish greater permanence and require the Company to seek approval should it seek to modify those practices again in the future. While we do not believe this is strictly necessary for Decision Options 12 and 19, we recommend the Commission affirmatively approve Decision Options 23 through 26.

With this in mind, we offer new, revised, and preferred Decision Options. The Joint Commenters **support** the following Decision Options:

8. Accept Xcel Energy's compliance report on metrics regarding its Emergency Medical Account as ordered in Docket No. E-002/M-22-233.
  
9. Grant Xcel Energy's request for a temporary extension of the variance to Minn. Rule 7820.2500 regarding AMI disconnection as approved in the Commission's March 22, 2023 Order in Docket No. E-002/M-22-233.



- a. Extend the variance until the Commission issues a decision on the variance request as presented in the 2024 SRSQ report.
  - b. Apply the extended variance retroactively starting from the expiration of the previous variance on April 22, 2024.
20. Require Xcel to make a filing in the instant docket and Docket E,G-999/PR-24-02 detailing its current disconnection policies and practices, and require Xcel to submit additional filings in Docket E,G-999/PR-YR-02 when there are changes to those policies and practices within 20 days of the Order.
21. Approve Xcel Energy's proposal to restore power for involuntarily disconnected customers with AMI during the duration of a heat advisory or excessive heat warning issued by the National Weather Service.
- NEW 22A.** Require Xcel to conduct additional outreach and provide customers with information about how to request medical protections if they are particularly vulnerable to poor air quality.
23. Require Xcel Energy to reduce its down payment requirements and modify its disconnection and payment agreement practices.
- NEW 23A.** Affirm that Minn. Stat. § 216B.096, subds. 5(a), 5(c), and 10(1), as well as Minn. Stat. § 216B.098, subd. 3 require the utility to negotiate payment agreement terms, including any down payment, individually with each customer based on the customer's financial circumstances and any extenuating circumstances of the household.
- NEW 23B.** Require Xcel to detail in its annual SRSQ report the average down-payment amount received from customers—both as a percentage of arrears and as a total dollar value—during CWR and non-CWR months. Xcel shall also explain how it has implemented the statutorily required consideration of both financial and extenuating circumstances during CWR and non-CWR months.
24. Prohibit Xcel Energy from sending disconnection notices until a customer's balance reaches \$180 past due.
25. Prohibit Xcel Energy from disconnecting customers with a past due balance below \$300.
26. Require Xcel Energy to wait at least 10 days after sending a disconnection notice before disconnecting a customer.



*The Joint Commenters recognize that the evaluations recommended in Decision Option 27 may not all be appropriate for inclusion in the same docket. For this reason, we offer two different dockets wherein the Company's evaluations should be filed.*

27. Require Xcel to evaluate implementing the following policies and to file the evaluation by [April 1, 2025](#) in [its 2024 SRSQ report](#).
  - a. Restoring power to involuntarily disconnected customers with AMI when AQI alerts of 151 or higher have been issued.
27. Require Xcel to evaluate implementing the following policies and to file the evaluation in [Supplemental Direct Testimony to its rate case filed November 1, 2024](#).
  - c. Elimination of interest payments on late bill payment fees or donation of those fees to low-income customer assistance programs, similar to the approach used by Xcel in Colorado.
31. Where not otherwise noted, require Xcel to file any necessary revised tariff changes within 30 days of the Commission's Order.

The Joint Commenters **do not support** the following Decision Option.

49. Require Xcel Energy to report on discrepancies between the number of customers that have applied for and been enrolled in its medical protection programs in future SRSQ reports.

The Joint Commenters also wish to offer clarification regarding Decision Option 30. It is our understanding that the Company addressed bad debt in its rate case filed November 1, 2024 and that Decision Option 30 is not necessary.

Lastly, and as noted in the introduction to this Letter, there are several additional Decision Options the Commission may choose to adopt, but which we understand Xcel will implement even in the absence of affirmative Commission approval. These Decision Options are detailed below.

12. Increase the existing threshold of final contact for disconnection to require Xcel Energy to use two methods of electronic communication, including either text message or email in addition to voicemail.
19. Require Xcel to publish its disconnection and payment agreement policies and practices on its website. Subject to technical feasibility, Xcel shall make the edits discussed in ECC/CUB's September 12, 2024 comments to its payment agreement webpage.



**CITIZENS UTILITY BOARD**  
Empowering Minnesota Consumers

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The Joint Commenters appreciate the Commission's close consideration of these pressing issues and will be available for questions.

Sincerely,

November 4, 2024

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