



June 14, 2021

VIA ELECTRONIC FILING

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

Re: In the Matter of Gas Affordability Program Annual Reports
Docket Nos. G008/M-21-218 (CenterPoint), G011/M-21-224 (MERC), and G002/21-220 (Xcel)

Dear Mr. Sueffert:

Please find the attached Reply Comments of the Energy CENTS Coalition in the above-referenced matters. If you have questions about these comments, please call me at 651-470-4500.

Sincerely,

Pam Marshall

Executive Director
Energy CENTS Coalition

**State of Minnesota
Before the Public Utilities Commission**

Katie Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

In the Matter of Natural Gas Affordability Program
Annual Reports

Docket No. G008/M-21-218
Docket No. G011/M-21-224
Docket No. G002/21-220

Reply Comments of the Energy CENTS Coalition

INTRODUCTION

The Energy CENTS Coalition (“ECC”) respectfully submits the following Reply Comments to the Department of Commerce, Division of Energy Resources (“Department”) regarding the Gas Affordability (“GAP”) reports submitted by CenterPoint Energy (“CPE” or “the Company”), Minnesota Energy Resources Corporation (“MERC” or “the Company”), and Xcel Energy (“Xcel” or “the Company”).

RESPONSE TO INDIVIDUAL REPORTS

CenterPoint Energy

ECC supports CPE’s proposed adjustment to the GAP affordability and arrearage forgiveness levels from 4% to 2% and from 2% to 1%, respectively. However, ECC is concerned that increasing the credit amounts will allow the Company to spend GAP funds on fewer customers and respectfully requests that the Commission continue to require CPE to report on outreach activities to expand LIHEAP. As reported in Docket No. #20-375, CPE’s LIHEAP customers decreased from 29,585 in 2015 to 25,312 in 2019. Decreasing LIHEAP customer counts is the primary factor in the Company’s decreasing number of GAP customers (from 10,074 in 2015, to 8,237 in 2019).

Further, ECC recommends that the Commission allow the Company to increase the GAP surcharge but decline to allow the Company to adjust the annual program budget. As noted in other dockets, ECC shares the Department’s concern about CPE’s GAP administrative costs.¹ The Department notes that CPE “has generally high administrative costs for its GAP program, 10.9% of total program costs ..., well above the 5% recovery cap. The Department is concerned

¹ See Docket Nos. 19-367 and 20-399.

that increasing the program’s overall spending [will] allow CenterPoint to recover a higher portion of the above cap cost.”² ECC agrees with the Department’s assertion and, given the recent spending trend, believes that increasing the program’s annual budget would be premature.

For several years, CPE’s has provided GAP credits at levels under the \$5 million annual program budget:

Year	Affordability/arrearage credits
2017	\$3.45 million
2018	\$3.60 million
2019	\$4.11 million
2020	\$3.27 million

In their GAP report, CPE stated that they “decided to not renew its contract with Energy Cents Coalition (“ECC”) for administration of the GAP program. The Company believes that it can move administration in house and reduce program costs.”³ ECC would like the record to reflect that ECC’s administrative costs in 2020 were \$67,487 out of the \$400,324 total to administer CPE’s CAP.

ECC appreciates the Company’s outreach efforts but, remains concerned that those efforts are not reaching larger number of customers. CPE reports that they mailed information or placed calls to 42,038 customers in 2020. It appears that even this number may be overstated since the Company reports that 3,010 calls were made from July 2020 through *September 14, 2020* and 10,422 were made from July through *December 14, 2020*.⁴

Given that 117,803 CPE customers were past due as of February 2020, and only 1,811 customers had entered a payment agreement, ECC recommends that CPE increase the frequency of outreach activities and promote LIHEAP to more customers.⁵ In the two most recent compliance filings⁶, the Company reports the following *LIHEAP* outreach efforts that were targeted to customers who had *not* previously received LIHEAP:

- On Feb. 20, 2020 the Company emailed 1,810 active customers that had not previously received LIHEAP assistance and had a delinquency of an amount greater than \$500.
- On 4/23/2020, 4/30/2020, 5/7/2020, and 5/14/2020, 4 batches of 3,000 emails were sent to active customers with the greatest arrearage balances who had not previously received LIHEAP.

² Department Comments, June 4, 2021, p. 13 in this Docket.

³ CPE, Initial Filing, Docket No. 21-218, March 31, 2021, p. 1.

⁴ *Id.*, p. 22.

⁵ It is ECC’s

⁶ Compliance filings dated June 30, 2020 and December 23, 2020 in Docket No. 19-367.

- CenterPoint Energy is targeting 2,000 calls a day from June 17, 2020 to June 30, 2020 for customers who are delinquent 31-60 days in the counties of Hennepin, Anoka, Dakota, Scott, and Wright

As ECC has continued to explain, the only way to increase GAP participation is to first increase LIHEAP participation. As ECC has noted before⁷, too few of CPE's outreach efforts promote LIHEAP and, the promotion that does take place, does not target a larger number of past-due customers. As ECC stated previously, the Company's "first quarterly outreach report includes eight specific outreach activities, only three of which were directed at promoting LIHEAP. Only two of the three LIHEAP activities were directed at customers who had not received LIHEAP in the past."⁸ As indicated above, only three of ten outreach activities described in the most recent compliance filing focused on reaching new LIHEAP customers.

ECC recommends that the Commission require CPE to focus primarily and more extensively on increasing the number of LIHEAP customers. The Company states that they will continue their "promotional efforts to past-due customers, to customers applying for Cold Weather Rule protection and to customers receiving disconnection notices to encourage them to apply for LIHEAP."⁹ In order to increase the number of new LIHEAP customers, the Commission should require CPE to focus outreach efforts primarily on past-due customers.

Xcel Energy

ECC supports Xcel's proposal to lower the affordability credit percentage from 4% to 3%. Given the expanded outreach the Company is doing as part of their pandemic economic recovery efforts, ECC does not support lowering the current GAP customer surcharge. ECC also agrees with the Department's rationale that "it may not be unreasonable to use ... [the tracker balance] excess funds to further help those in need. In particular, a lower threshold may be appropriate to help customers that have fallen further behind on payments over the past year due to the pandemic."¹⁰ In addition, the LIHEAP program year has been extended until September 1, 2021. This month, utilities are also resuming disconnection notice mailings. Both of these factors will increase the number of customers who apply for LIHEAP and, potentially, for GAP.

MERC

While the number of MERC's LIHEAP customers has been relatively stable over the last several years,¹¹ the number of MERC GAP customers continues to decrease (from 1,546 in 2015 to 1,304 in 2020). More concerning, the 2019 disconnection rate for MERC's LIHEAP customers

⁷ ECC Reply Comments, May 21, 2020, p. 3.

⁸ *Id.*

⁹ CPE Compliance Filing, December 23, 2020, p. 2, Docket No. 19-367.

¹⁰ Department Comments, June 4, 2021, p. 14 in this Docket.

¹¹ See Docket No. 20-375.

was 11%. Rather than wait for MERC to address these issues until nearly a year from now (May 31, 2022), ECC recommends the Commission immediately require MERC to lower the affordability credit percentage from 6% to 3% so that more customers will qualify for GAP. Particularly given the current economic conditions and the fact that 30,134 MERC customers are past-due and only 511 have entered payment agreements,¹² allowing more customers to participate in GAP is critical.

ECC does not understand why MERC requests suspending the annual program spending cap when the tracker balance is significant and before the affordability credit percentage is lowered. If the Commission requires MERC to lower the credit percentage, then ECC does not oppose suspending the current program budget. To do so, however, without increasing credits and expanding participation, is not reasonable.

ECC also shares the Department's concern about MERC GAP customers with high credit amounts (or negative arrearage balances). ECC also agrees with the Department that "the arrearage forgiveness payments should end once the customer is no longer in arrears, which would make a negative balance impossible.

It seems that the reason for those high credits may be embedded in MERC's arrearage forgiveness calculation that the Company describes as follows:

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.

From this description, it appears that a high credit balance may result because of the way in which MERC is treating a LIHEAP payment and the fact that two LIHEAP payments could be received over the 24-month arrearage term. ECC recommends the Commission require MERC to explain if a LIHEAP grant is fully applied to a GAP customer's past-due balance. If this is not the Company's practice, ECC recommends that MERC apply GAP customer LIHEAP grants to the past-due balance and then calculate the level of arrearage co-payment and matching Company payment.

¹² *Id.*

ECC agrees with the Department that an explanation for large GAP customer credit balances is warranted. Further, ECC recommends the Commission require MERC to provide the number of GAP customers, enrolled at some point during 2020, who have credit balances. This information is important because it may show that MERC's overall GAP enrollment is lower than the reported 1,304 customers.

ECC also recommends the Commission require MERC to explain how, with a lower annual customer bill (\$655 compared to \$708-\$1,096 for the other gas utilities), their affordability credit is higher compared to the other gas utilities (\$443 compared to \$175-\$317).

CONCLUSION

ECC respectfully recommends the Commission make the following determinations regarding CPE, Xcel and MERC Gas Affordability Programs.

CenterPoint Energy

- 1) Approve CPE's proposed adjustment to the GAP affordability and arrearage forgiveness levels from 4% to 2% and from 2% to 1%, respectively.
- 2) Approve the Company's proposal to increase the GAP surcharge.
- 3) Deny the Company's proposal to suspend the annual program spending cap.
- 4) Require the Company to promote LIHEAP to more past-due customers.
- 5) Continue to require CPE to report on outreach activities to expand LIHEAP.

Xcel Energy

- 1) Approve the Company's proposal to lower the affordability percentage from 4% to 3%.
- 2) Require the Company to maintain the current program surcharge.

MERC

- 1) Require the Company to lower their GAP affordability credit percentage from 6% to 3%.

- 2) If the affordability credit percentage is lowered, approve the Company's proposal to suspend the annual program spending cap.
- 3) Require the Company to explain why the average arrearage balance for GAP customers is negative \$1,050.
- 4) Require the Company to provide the current total number of GAP customers and the current number of GAP customers with credit balances.
- 5) Require the Company to explain if a LIHEAP grant is fully applied (one-time) to a GAP customer's past-due balance. If this is not the Company's practice, ECC recommends the Commission require the Company to apply the total GAP customer LIHEAP grant to any past-due balance and to calculate the level of arrearage co-payment and matching Company payment on any remaining past-due balance.
- 6) Require the Company to explain how, if GAP payments are set at 6% of household income, GAP benefits cover 68% of an average annual gas bill.
 - a) Require the Company to provide the average annual income for GAP customers.
 - b) Require the Company to explain if, and how, the current average affordability credit contributes to the average negative GAP customer credit balance.

Respectfully submitted

June 14, 2021



Pam Marshall

AFFIDAVIT OF SERVICE

Pam Marshall certifies that on the 14th day of June 2021, she served, by electronic filing, Energy CENTS Coalition Reply Comments In the Matter of Gas Affordability Program Annual Reports, Docket Nos. G008/M-21-218 (CenterPoint), G011/M-21-224 (MERC), and G002/21-220 (Xcel) to the individuals on the attached service list.

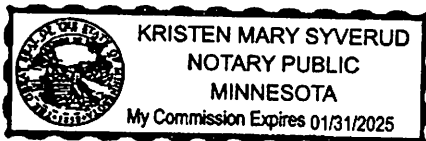
Pam Marshall

Pam Marshall

KRS

Kristen Syverud

Subscribed and sworn to before me
this 14th day of June 2021



Notary Public

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