

In the Matter of Xcel Energy's Petition for Bill Credit Pilot Program

PUC Docket Nos. E002/M-24-173, E002/M-22-266, E002/RP-19-368

LIUNA Minnesota and North Dakota ("LIUNA") regrets our failure to timely file reply comments on Xcel Energy's proposed Automatic Bill Credit Pilot Program, and hopes that the Public Utilities Commission will nonetheless consider our perspective.

LIUNA participated in Xcel's Equity Stakeholder Advisory Group process because we believe that equity is a critical consideration in utility regulation alongside affordability, reliability, and broad environmental and socioeconomic impacts. Energy utility services are, in general, more equitable than any other aspect of our economy. Regulated utilities are required to provide the same quality of service for the same price, rather than charging low-income customers and people of color more for less as is common in banking, employment, insurance, retail, and nearly every other sector of our economy.

Beyond delivering equitable services to customers, there are other ways regulated utilities can make their own operations more equitable, and help to address larger social inequities. We believe that opening employment and other economic opportunities associated with utility investment is one of the most important steps utilities can take, which is why we have partnered with Xcel and other utilities to improve diversity in construction employment. However, we also believe that there is a role for other programs that attempt to directly ease burdens and provide opportunities for under-resourced communities.

In our view, the proposed Automatic Bill Credit is among the most direct and efficient means to provide direct support and support wealth-building among customers and communities where the need is greatest. As Xcel and others have observed, there are many barriers that low-income individuals face when attempting to access other programs designed to help reduce the burden of utility bills. Further, these programs entail significant administrative costs through efforts at public education, processing of applications and verification of eligibility – most of which must be done over and over due to changes in address or economic circumstance. By contrast, an automatic bill credit provides direct support with maximum efficiency and minimum administrative burden to the utility, program providers and participants.

While we do not believe that it is the job of the regulated utility system to solve social inequities, we believe that this is a reasonable step toward doing our part that would deliver widespread benefits at a very low cost to the system generally. Further, we believe that piloting this approach could help advance our understanding of the most effective ways to advance equity consistent with other obligations.

Thank you for your consideration.

Dated: July 24, 2024

Respectfully Submitted,
LIUNA Minnesota & North Dakota

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