

**STATE OF MINNESOTA
BEFORE THE PUBLIC UTILITIES COMMISSION**

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

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

DOCKET NO. E002 / M-17-775

**PETITION FOR RECONSIDERATION
OF THE OFFICE OF
THE ATTORNEY GENERAL**

The Office of the Attorney General – Residential Utilities and Antitrust Division (“OAG”) respectfully submits this Petition for Reconsideration of the Commission’s Order Approving Pilot Program, Setting Reporting Requirements, and Denying Certification Request (“Order”) issued on August 7, 2018. The OAG does not seek reconsideration of the Commission’s decision in Docket 17-776, or of the Commission’s decision to approve Xcel’s Time of Use (“TOU”) rate design pilot, or of the core principles of the TOU rate itself. The purpose of this Petition is to request reconsideration of the bill protections included in the TOU rate pilot in order to protect low-income customers, and improve the performance of the pilot.

A TOU rate, when well-designed and implemented, has the opportunity to significantly reduce system costs and save money for all customers, but it can be difficult to predict how it will impact specific customer groups. From the OAG’s perspective, one of the primary purposes of this pilot process is to ensure that the TOU rate does not unreasonably harm low-income customers. If the TOU rate pilot demonstrates that low-income customers are not unreasonably harmed, or that there are sufficient protections in place, then it may be possible to capture system cost reductions by expanding the rate to more customers in the future. If the TOU rate pilot does

result in problems for low-income customers that are not controlled, or if it does not produce sufficient data about the impacts, then it may not be possible to expand the rate to more customers.

For that reason, the OAG asks the Commission to reconsider its decision on low-income bill protections so that all low-income customers receive the same bill protections during this pilot, not just those who are LIHEAP recipients. Extending the improved bill protections to all low-income customers would reduce the risks of the TOU rate pilot, potentially improve the data that is collected about low-income customer impacts, and would not have any significant downsides.

I. STANDARD FOR RECONSIDERATION.

Any party to a proceeding, or any person who is “aggrieved” and directly “affected” by a Commission order, may file a petition for rehearing or reconsideration within 20 days.¹ The Commission may reverse or change its original decision if it appears that the “original decision, order, or determination is in any respect unlawful or unreasonable.”²

II. BACKGROUND INFORMATION ON LOW-INCOME CUSTOMER PROTECTIONS.

The TOU rate pilot approved by the Commission currently provides two different levels of bill protections. All customers will be provided a refund if they are charged 10 percent more under the TOU rate than they would have been under standard rates after the first year of the program. The refund for these customers would be equal to the difference greater than 10 percent.³ Customers who receive LIHEAP assistance will receive additional protections: a full true-up to standard rates on a monthly basis during the first year of the pilot, and an annual true

¹ Minn. Stat. § 216B.27; Minn. Rules part 7829.3000, subp. 1.

² Minn. Stat. § 216B.27, subd. 2.

³ *In the Matter of Xcel’s Residential Time of Use Rate Design Pilot Program*, Docket No. E-002/M-17-775, PETITION at 27 (Nov. 1, 2017).

up to ten percent during the second year of the pilot (the same protection provided to all customers during the first year).⁴ Throughout the rest of this Petition, the additional bill protections currently provided for LIHEAP recipients are referred to as “improved bill protections.”

The primary limitation with the existing bill protection system is that limiting eligibility to LIHEAP recipients excludes many low-income customers who do not receive LIHEAP benefits. According to testimony provided by Pam Marshall of the Energy Cents Coalition in Xcel’s last rate case, Minnesota’s LIHEAP program serves only 30 percent of the customers who should be eligible for LIHEAP services.⁵ The Commission has recognized this fact in its prior orders,⁶ and the Commission acknowledged it again in Xcel’s last rate case.⁷ The low-income protections in the existing TOU rate pilot will miss a wide percentage of low-income customers because it is limited to only those who receive LIHEAP benefits.

For this reason, the OAG recommended that the Commission extend the improved bill protections provided to LIHEAP recipients to all low-income customers.⁸ As the OAG explained in its Comments, this could be accomplished by permitting customers to self-identify that they would pass LIHEAP eligibility criteria, without requiring income verification from Xcel. The Commission’s Order acknowledged that the recommendation had been made, but did

⁴ *Id.*

⁵ *In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota*, Docket No. E-002/GR-15-826, DIRECT TESTIMONY AND ATTACHMENTS OF PAM MARSHALL at 13 (June 14, 2016).

⁶ *Id.* (citing *In the Matter of an Application by CenterPoint Energy for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G-003/GR-03-1075, FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER (Jan. 11, 2010) (“[T]here are almost three times more LIHEAP eligible (low-income) customers not receiving LIHEAP than actually receive LIHEAP . . .”).

⁷ *In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota*, Docket No. E-002/GR-15-826, FINDINGS OF FACT, CONCLUSIONS, AND ORDER at 60 (June 12, 2017) (“As noted previously, most low-income households do not receive LIHEAP assistance.”).

⁸ *In the Matter of Xcel’s Residential Time of Use Rate Design Pilot Program*, Docket No. E-002/M-17-775, OAG COMMENTS at 17–19 (Feb. 5, 2018).

not address the issue further. In this Petition, the OAG asks the Commission to reconsider its Order, and to extend improved bill protection to all low-income customers in order to improve the performance and mitigate the risks of the TOU rate pilot.

The following sections will explain why it would be such a problem to limit low-income bill protections to LIHEAP recipients, why the OAG's proposal will mitigate those problems, and why the benefits of the OAG's proposal outweigh any potential downsides.

III. LIMITING LOW-INCOME BILL PROTECTIONS TO LIHEAP RECIPIENTS INCREASES THE RISK OF UNINTENDED CONSEQUENCES.

One of the ways that the TOU rate pilot could fail is if it creates significant bill impacts for low-income customers. Another potential risk is that the TOU rate pilot could unintentionally drive low-income customers who do not receive LIHEAP to opt out, which could impact the data that is collected by the pilot. Conducting a pilot without collecting sufficient data about low-income customer impacts would increase the risks of unintended consequences for any broad rollout in the future. The improved bill protections afforded to LIHEAP recipients are a significant step to mitigating these concerns, but it is a problem that those benefits are limited to only a subset of low-income customers.

The differences between the bill protections may appear subtle, but are in fact very significant for low-income customers in particular. To provide an example, imagine a low-income LIHEAP recipient who gets an unexpected electricity bill of \$300 during a summer month. The bill could happen because the customer did not understand the TOU rate, the outreach was ineffective, the customer did not have the ability to respond, or because there were problems with the way the rate was designed. Because this low-income customer is a LIHEAP recipient, they will immediately receive a true-up back to the standard rate the next month, and,

because there bill is trued up every month, have the opportunity to opt out with no financial penalties going forward.

When receiving the same bill, a low-income customer without LIHEAP would not be able to receive a true-up unless they remain on the TOU rate for an entire year, *and* their aggregate bills for the year under the TOU rate are more than ten percent above the standard rate. This could create significant hardship for a low-income customer that does not receive LIHEAP. They will have the choice of either (1) waiting for an entire year to see if they get a true-up refund (potentially receiving high bills every month), or (2) exiting the rate immediately, paying at least one month of high bills, and abandoning any chance at a refund.

The different choices available to the LIHEAP recipients and non-recipients are presented in Table A:

Table A
Options Available to Low-Income Customers Who Receive High TOU Bills

	LIHEAP Recipients	Non-Recipients
Choice A	Receive an immediate true up and opt-out	Opt out and forego any true-up
Choice B	Receive an immediate true-up and stay in the TOU Pilot	Stay on the TOU rate, potentially paying increased bills for an entire year, and hope for a true up

The options available to low-income customers who do not receive LIHEAP are significantly worse than those available to LIHEAP recipients. This creates two problems. First, it is reasonable to protect low-income customers from unexpected high bills during the first year of the TOU pilot, and to give them a chance to opt out without suffering a financial penalty just because they were placed into a pilot program. Requiring some low-income customers to wait for a year to receive true-ups, or to abandon true-ups in order to avoid additional months of high bills, is not reasonable during a rate design pilot. Further, it would not be reasonable to treat

low-income customers differently just because one receives LIHEAP benefits and another does not, especially when experimenting with new rates designs that have the potential for unintended consequences. In fact, low-income non-recipients may represent the most vulnerable customer group: they share the same financial struggles as LIHEAP recipients, but do not receive the same benefits.⁹ If anything, low-income customers who do not receive LIHEAP may need bill protection more than anyone else.

Second, non-recipients who receive large bills may be driven to opt out of the TOU rate pilot because they do not have the financial wherewithal to wait a year, potentially accumulating large bills every month, in the hopes of a refund. If low-income non-recipients are driven out of the pilot, it could have a negative impact on the data produced by the pilot. The pilot would no longer capture information about the impact on those low-income customers, and Xcel would no longer have the opportunity to hone its marketing for those customers. Driving a subset of low-income customers out of the program could conceal design problems with the rate that could have otherwise been addressed. To the extent that the Commission considers broader rollout in the future, doing so based on incomplete data about low-income customer impacts could significantly increase the risks of unintended consequences.

These concerns create risks for the TOU rate pilot that could be avoided by extending the improved bill protections to all low-income customers.

IV. EXTENDING IMPROVED BILL PROTECTION TO ALL LOW-INCOME CUSTOMERS WOULD MITIGATE THE RISKS OF UNINTENDED CONSEQUENCES.

The concerns discussed above led the OAG to recommend that the improved bill protections be extended to all low-income customers. Customers should be permitted to sign a

⁹ There are many reasonable explanations for why low-income customers are not LIHEAP recipients.

simple document stating that their income level would meet LIHEAP requirements, and then receive the improved bill protections that are currently restricted to LIHEAP recipients. The legislature has already signaled support for self-identification by allowing customers self-identify their income status for other low-income programming. The Cold Weather Rule (“CWR”) permits a utility to “accept the signed statement of a customer that the customer is income eligible” as a way to verify that they are eligible for CWR protections.¹⁰ Presumably, Xcel has a system in place to accept these “signed statements,” which could be extended to cover customers in the TOU pilot because the eligibility criteria appear to be identical. The same standards should be applied to the low-income protections in the TOU rate pilot: low-income customers should be able to self-identify themselves for improved bill protections by signing a statement that they are income eligible, with no further income verification necessary. This step would mitigate the risks of problems developing in the TOU rate pilot, and it would be fair because it would treat all low-income customers the same.

V. THE BENEFITS OF EXTENDING IMPROVED BILL PROTECTION TO ALL LOW-INCOME CUSTOMERS WOULD OUTWEIGH ANY LIMITED DOWNSIDES.

The benefits of extended improved bill protection are that it would treat all low-income customers equally, it would protect low-income customers from unanticipated high bills during the pilot, and it could improve the data about low-income customers that is collected during the pilot. In contrast, there do not appear to be many downsides to adopting the OAG’s proposal. One potential downside is that extending improved bill protection to more low-income customers would increase the cost of the program. That is not a significant concern for two reasons. First, it is relatively unlikely that the costs would be significant, and Xcel would have the opportunity

¹⁰ Minn. Stat. § 216B.096, subd. 6(a)(1).

to request recovery of those costs through a future rider filing. Second, if there are significantly increased costs because of providing improved bill protection to low-income customers, it would be a sign that the TOU rate pilot has gone wrong and needs to be re-evaluated. In other words, to the extent that extended improved bill protection to more customers leads to significantly increased costs, it would be far better to discover that problem during the pilot than afterwards.

Another potential downside could be the possibility for customers to self-identify for low-income protections that they are not entitled to. To some extent, this concern is speculative. There is no evidence to suggest that customers would inappropriately identify themselves as low income, and it may not be reasonable to assume the worst without any evidence. The Legislature has already signaled its support for self-identification of low-income status in some circumstances, as seen in the Cold Weather Rule. Further, the limited size and duration of the TOU rate pilot mean that any impact will be necessarily small. To the extent that there are any concerns about self-identified customers behaving differently than customers who receive LIHEAP, Xcel confirmed that it would be possible to track the different customer groups during the pilot. Finally, given the experimental nature of the TOU rate pilot itself, it is reasonable to experiment with concepts like self-identification in order to make sure that the TOU rate pilot is successful.

It is also unlikely that allowing customers to self-identify would increase the administrative burdens of the program. Xcel has already indicated that it plans to provide customers with pre-pilot surveys. These surveys could easily be used to allow customers to self-identify for low-income protections. Further, having a simple and quick way for customers to enroll in low-income protections may actually reduce administrative burdens.

Ultimately, the potential downsides of extending improved bill protection to all low-income customers are far outweighed by the benefits of mitigating the risks of the TOU pilot.

CONCLUSION

The goals of the TOU rate pilot include getting more information about the impact of the rate on low-income customers, mitigate the risks of the pilot for low-income customers, and developing solutions if there are unreasonable impacts for low-income customers. The improved bill protections granted to LIHEAP recipients make steps towards accomplishing these goals, but only for a small subset of low-income customers. The TOU rate pilot may not be able to accomplish these important goals if the vast majority of low-income customers do not receive these protections.

The Commission should reconsider its decision, and extend the improved bill protections to all low-income customers, instead of restricting them to LIHEAP recipients. Customers should be permitted to self-identify as eligible for low-income bill protection by signing a simple form, and no additional verification should be required during the pilot. Finally, the Commission

should order Xcel to track LIHEAP recipients and customers who self-identify as eligible for low-income bill protection separately so that data about the different groups can be analyzed.

Dated: August 27, 2018

Respectfully submitted,

LORI SWANSON
Attorney General
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s/ **Ryan P. Barlow**

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August 27, 2018

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RE: *In the Matter of Xcel's Residential Time of Use Rate Design Pilot Program*
MPUC Docket No. E002/M-17-775

Dear Mr. Wolf:

Enclosed and e-filed in the above-referenced matters please find a Petition for Reconsideration of the Office of the Attorney General – Residential Utilities and Antitrust Division.

By copy of this letter all parties have been served. An Affidavit of Service is also enclosed.

Sincerely,

s/ **Ryan P. Barlow**

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