

Revised Decision Options - E002/M- 24-173

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

Staff has compiled a modified list of decision options based on late filings. Changes from the decision options listed in the 10/2/24 briefing paper are marked in red underline.

1. Find that the pilot proposal advances the Commission's objective for the Equity Stakeholder Advisory Group (ESAG) related to designing for the equitable delivery of electricity services and programs for energy-burdened customers. *(Xcel, Department,¹ Joint Commenters²)*
2. Approve Xcel's petition for an automatic bill credit pilot program.

OR

3. Deny Xcel's petition. *(James Siegel)*

OR

4. Approve Xcel's petition for an automatic bill credit pilot program with the modifications described below:

Modifications

*The Commission may choose any combination (or none) of the following Decision Options to modify the proposal. If the Commission chooses to approve the pilot with modifications, it should select any desired modifications from the options below. For any modification decision option that is **not** selected, the corresponding part of Xcel's petition will be approved by default. The Decision Options are broken out by themes identified in the Notice of Comment.*

Method

5. Within 30 days after the pilot has been operational for two years, require Xcel to make a filing addressing whether the pilot term should be extended to five years. The pilot shall continue until the Commission has issued an order resolving this question. *(Staff interpretation of Department)³*

¹ DOC Initial Comments, p. 18

² CEE and ECC Initial Comments, p. 1

³ DOC Initial Comments, p. 10

6. Require Xcel to continue its efforts to implement the recommendations from the Equity Stakeholder Advisory Group and to monitor efforts from the Environmental Justice Board. *(Department)*⁴

Bill Credits

7. Require Xcel to implement the additional screens identified below to determine eligible CBGs. Require Xcel to revise and file the analysis of the total number of CBGs and premises eligible for a bill credit, as well as the total cost of the Bill Credit Pilot, after running these screens.
 - A. Screen out CBGs with 15 or fewer premises.
 - B. Screen out premises where the customer name indicates a corporate or government entity, or other entity that is not a natural person, pays the electric bill, including but not limited to the terms in OAG Attachment 6.⁵
 - C. Screen out premises where the customer billing address is outside of Minnesota. *(OAG,⁶ Xcel,⁷ Fresh Energy⁸)*
 - D. Screen out data for premises where the premise address and the in-state billing address are not the same.
 - E. Flag for extra scrutiny any account holder names that appear multiple times in the data. *(Xcel⁹)*
8. Require Xcel to use poverty rates as a second criterion for determining bill credit eligibility. *(Department)*¹⁰
9. Require Xcel Energy to do an annual true-up for each customer, and apply a net negative balance to the customer's account for the following year. *(CAPRW,¹¹ Xcel opposed¹²)*

Evaluation – Metrics and Data Reporting

Should Commissioners wish to adopt Decision Options 10 or 11 related to reporting content, it may also choose 17 or 18 related to the frequency of reporting.

⁴ DOC Initial Comments, p. 18

⁵ OAG Initial Comments, Attachment 6

⁶ OAG Initial Comments, p. 34

⁷ Xcel Reply Comments, pp. 13-15

⁸ Fresh Energy Reply Comments, p. 1

⁹ Xcel Reply Comments, pp. 13-15

¹⁰ DOC Initial Comments, p. 18

¹¹ CAPRW Initial Comments, p. 9

¹² Xcel Reply Comments, p. 21

~~10. Require Xcel file the following monthly data in this docket for customers in each participating CBG:~~

- ~~A. The number of premises in each participating CBG involuntarily disconnected;~~
 - ~~B. The number of premises in each participating CBG who sought protection under the cold weather rule;~~
 - ~~C. The number of premises in each participating CBG who were granted protection under the cold weather rule;~~
 - ~~D. The number of payment plan requests received in each participating CBG;~~
 - ~~E. The number of new mutually agreed payment plans in each participating CBG;~~
 - ~~F. The number of premises with current payment plans in each participating CBG;~~
 - ~~G. The number of past due accounts in each participating CBG;~~
 - ~~H. The average monthly past due amount for past due accounts in each participating CBG;~~
 - ~~I. The total dollars past due for residential customers in each participating CBG;~~
 - ~~J. The number and amount of write-offs from uncollectible accounts in each participating CBG;~~
 - ~~K. The number and amount of late fees charged to customers;~~
 - ~~L. The number of premises electing to opt out of the bill credit, and which CBG they are in.~~
- ~~(OAG; Xcel opposed¹³)~~

OAG REVISED 10. Require Xcel file the following data in this docket for customers receiving bill credits:

- A. The number of premises involuntarily disconnected;
- B. The number of premises who were granted protection under the cold weather rule;
- C. The number of premises with current payment plans;
- D. The number of past due accounts;
- E. The total dollars past due;
- F. The number and amount of write-offs from uncollectible accounts;
- G. The number and amount of late fees charged to customers;
- H. The number of premises electing to opt out of the bill credit.

11. Require Xcel to report on the following metrics until the end of the pilot period. If the data is not available, require Xcel to explain why the data is not available.

- A. Average bill credit amount per month
- B. Total bill credits dollars
- C. Missing payments
- D. Disconnections
- E. Arrearages

¹³ Xcel Reply Comments, p. 18

- F. Participation rates and amount of assistance for other energy assistance programs
 - G. Participant billing impacts (e.g., percentage reduction in customer's bill.)
 - H. Number or percentages of customers that Opt-out of credit
- (Department,¹⁴ Xcel alternative,¹⁵ OAG supports 11.A and 11.C)

If the Commission chooses any subpart of Decision Option 11, it may also choose Decision Option 12.

12. Require Xcel in its first report to include two years of historical data prior to automatic bill credits being applied. If two years of historical data is not available, Xcel shall explain why not.

(Staff interpretation of Department)

13. Require the Company to, before the pilot begins, define the pilot's intended outcomes and identify how it will measure and report on these, including at minimum the following areas:

- a. The impact that automatic bill credits have on participants' electric bills.
- b. Associated benefits from the pilot, including changes in payment of Xcel bills, customer arrears, service disconnections, and customers' ability to pay for other daily expenses.
- c. Impacts on participation in and benefits received from other bill payment assistance programs.

(Staff interpretation of Department)

14. Require the Company to, before selecting a third-party evaluator, articulate the specific outcomes it hopes to achieve through the Pilot, and the specific metrics it proposes to track by which to measure these outcomes. (CAPRW¹⁶)

15. Require Xcel to evaluate the degree of overinclusion in the pilot. (CAPRW)¹⁷

16. Require Xcel to submit a compliance filing with its monitoring and evaluation plan and its anticipated pilot start date within 90 days of the order. (Staff suggestion)

Evaluation – Frequency of Reporting

¹⁴ DOC Initial Comments, p. 19

¹⁵ Xcel Reply Comments, p. 18

¹⁶ CAPRW Initial Comments, p. 10

¹⁷ CAPRW Initial Comments, p. 4

17. Require Xcel to report on pilot implementation and evaluation process every six months after the pilot launches, in a compliance filing in this docket. (*Fresh Energy, Department, OAG*)¹⁸
18. Require Xcel to report on metrics listed in **Decision Option 10** in a quarterly compliance filing in this docket, beginning with monthly data for the quarter before the credit is applied, and monthly data for each quarter thereafter. (~~OAG~~)

Evaluation – Consultation with ESAG

19. Require Xcel to consult with ESAG on the scope of work of the evaluation to be included in its RFP. (*Joint Commenters,*¹⁹ *Xcel,*²⁰ *Fresh Energy,*²¹ *CAPRW*²²)

If the Commission chooses Decision Option 19, it may also choose Decision Option 20.

20. Require Xcel to conduct one stakeholder meeting between ESAG, the company, and the third-party evaluator during the evaluation design process and before data collection begins. (*Joint Commenters,*²³ *Xcel*²⁴)
21. Require Xcel to update ESAG via email every two months on the implementation of the Pilot Petition and on the evaluation process. (*Fresh Energy*)²⁵

Other Topics

22. Require Xcel to provide credit recipients with energy efficiency investment and workforce development opportunities. (*Joint Commenters,*²⁶ *Fresh Energy*²⁷)
23. Require Xcel to develop a proposal and budget for an arrears forgiveness program for Automatic Bill Credit Pilot participants and file it in this docket within 90 days of the Commission's order. (*Joint Commenters*)

¹⁸ Fresh Energy Initial Comments, p. 8

¹⁹ Joint Commenters Initial Comments, p. 8

²⁰ Xcel Reply Comments, p. 22

²¹ Fresh Energy Initial Comments, p. 8

²² CAPRW Initial Comments, p. 10

²³ Joint Commenters Initial Comments, p. 8

²⁴ Xcel Reply Comments, p. 22

²⁵ Fresh Energy Initial Comments, p. 8

²⁶ Joint Commenters Initial Comments, pp. 9-10

²⁷ Fresh Energy Reply Comments, p. 2