



March 31, 2020

—Via Electronic Filing—

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

RE: ANNUAL REPORT

GAS AFFORDABILITY PROGRAM DOCKET NO. G002/M-20-____

Dear Mr. Seuffert:

Enclosed for filing is our Gas Affordability Program Annual Report for 2019. We submit this Report pursuant to our Natural Gas Low Income Energy Discount Rider Tariff and various Commission Orders in Docket Nos. G002/GR-06-1429 and G002/M-16-493. We are submitting this report as a new miscellaneous tariff filing as requested by the Commission's November 26, 2014 Order in Docket No. G002/GR-06-1429.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list.

Please contact Martha Hoschmiller at <u>martha.e.hoschmiller@xcelenergy.com</u> / 612-330-5973 or me at <u>bridget.dockter@xcelenergy.com</u> / 612-337-2096 if you have any questions regarding this filing.

SINCERELY,

/s/

BRIDGET DOCKTER
MANAGER, POLICY AND OUTREACH

Enclosures c: Service List

STATE OF MINNESOTA BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
John Tuma	Commissioner

IN THE MATTER OF NORTHERN STATES POWER COMPANY'S 2019 ANNUAL GAS AFFORDABILITY PROGRAM REPORT DOCKET NO. G002/M-20-____

ANNUAL REPORT

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Annual Report regarding our Gas Affordability Program (GAP) for 2019. We submit this Report pursuant to our Natural Gas Low Income Energy Discount Rider Tariff and various Commission Orders issued in Docket No. G002/GR-06-1429, as well as the May 22, 2017 and September 28, 2018 Orders issued in Docket No. G002/M-16-493. We respectfully request the Commission accept our 2019 Annual Report.

ANNUAL REPORT

Our Annual Report is structured as follows:

- I. Program Description
- II. Program Funding and Administration Costs
- III. Customer Payments, Disconnections, and Arrears
- IV. Retention, Satisfaction, and Collection Activity

We provide the 2019 GAP Tracker as Attachment A to this Report.

I. PROGRAM DESCRIPTION

The Program is designed to lower the percentage of income that low income households must devote to meet current energy bills and to increase the number of customer payments while also providing a mechanism for assisting customers in paying off arrearage balances. In this effort, the Company partners with Energy CENTS Coalition (ECC) on both outreach and administration of the Program.

We proposed our Program in November 2006 in our natural gas general rate case in compliance with Minn. Stat. § 216B.16, subd. 15. The Program was approved by the Commission in the September 10, 2007 Order in Docket No. G002/GR-06-1429. We implemented the Program on February 1, 2008 in conjunction with final rates.

Effective December 26, 2009, we reduced the household income threshold devoted to utility costs of our Program from six to four percent, in accordance with the Commission's November 18, 2009 Order.

The Commission's January 20, 2012 Order approved use of excess Tracker funds to supplement benefits in that year unless otherwise ordered by the Commission, and we updated our GAP tariff to specifically allow for use of excess Tracker funds in future Program years.

On June 1, 2012, we submitted our Evaluation Report of the first four years of the pilot Program. In its October 26, 2012 Order, the Commission accepted our evaluation and extended the pilot Program for four years (until December 31, 2016) with some Program changes and additional reporting requirements.

We submitted our next four-year Evaluation Report on May 31, 2016 in Docket No. G002/M-16-493. The Commission's May 22, 2017 Order in that docket accepted our evaluation, removed the expiration date from the program, and approved our request to return the monthly GAP surcharge to its former level of \$0.00445 per therm. In compliance with the Order, this report reflects both the non-GAP LIHEAP and preprogram baseline methodologies for measuring the Program's disconnections, payment frequency, and arrears. The September 28, 2018 Order in the evaluation docket approved a streamlined reporting format as proposed by the Utility Stakeholder Group.

We submitted our most recent four-year Evaluation Report on May 31, 2019 in Docket No. G002/M-19-380. The Commission's January 17, 2020 Order in that docket accepted our evaluation and required our next evaluation report be filed on May 31, 2022.

A. Program Eligibility

The GAP is available to any Minnesota Xcel Energy residential natural gas customer who is certified and receiving assistance from the Low Income Home Energy Assistance Program (LIHEAP) during the Program year.

Certified customers must agree to be placed on a levelized payment plan and schedule. Participants are automatically removed from the Program after a non-payment period of 60 days. In an effort to prevent this scenario, we proactively call participants after 30 days of non-payment to remind them that they will be removed from the Program if they exceed 60 days in arrears. If participants are removed from the Program for non-payment, they are not eligible for re-enrollment until the next Program year.

B. Discount Structure

The Program includes an Affordability component that limits enrolled customers' payments to four percent of their household income. The Program also has an Arrearage Forgiveness component that applies a monthly matching credit to the customer's balance after payment is received.

1. Affordability

The Affordability component consists of bill credits that are determined by calculating the difference between the Company's estimate of the customer's annual natural gas bill, and four percent of the customer's household income. We apply one twelfth of this amount to the customer's account each month of the Program year.

2. Arrearage Forgiveness

The Arrearage Forgiveness component is a credit that we apply to the customer's account each month after receiving the customer's payment. We calculate the arrearage forgiveness credit by dividing the total arrears by up to 24 months, with a goal of retiring pre-program arrears over the period.

The Affordability and Arrearage Forgiveness credits are both Program costs that are included in the GAP Tracker (see Attachment A for details).

C. Customer Payments

To determine the levelized Program payment amount for participants, ECC uses current billing amounts and consumption, approved LIHEAP benefits, and household income information. The determined levelized payment amount includes the participant's current month's bill (one-twelfth of the levelized payment plan) and a portion of the participant's pre-Program arrears.

As discussed in Section III below, Program participants paid a total of \$10,573,202 toward their energy costs during the 2019 Program year. The average per participant payment amount was \$91 per month. We calculated this number by dividing total participant payments of \$10,573,202 by the overall participation count of 9,675. This equals \$1,093 annually per participant, which divided by 12 months, equals an average of \$91 per GAP participant per month. The average monthly GAP participant payment amount increased compared to 2018, when the average monthly GAP participant payment amount was \$82. There was an increase in disbursements for GAP participants in 2019 because GAP credits are based on a customer's payment frequency and amount.

D. Program Year Enrollment

In 2019, we managed participation in the Program based on the tracker balance available, and ramped up spending for customers who have been consistently making payments, which resulted in an increase in disbursements compared to 2018. A total of 9,675 Xcel Energy customers participated in GAP at some point during the 2019 Program year, compared to 11,284 in 2018.

II. PROGRAM FUNDING AND ADMINISTRATION COSTS

We provide as Attachment A to this filing our GAP Tracker, which we also summarize in Table 1 below:

Table 1: GAP Tracker Summary								
Item	Amount							
Tracker Balance as of December 31, 2018	\$1,334,120							
Affordability & Arrearage Forgiveness Credits	\$2,815,093							
Administrative Program Costs	\$126,508							
Program Collections (per therm charge)	\$3,037,138							
Tracker Balance as of December 31, 2019	\$1,429,657							

A. Program Funding

The Program is funded by a per therm charge collected from all residential and most business customers. For 2019, the per therm charge was set at \$0.00445. In 2019, the

¹ This number reflects participant payments only and does not include any additional payments received by the Company from LIHEAP on behalf of the participant.

average cost for a residential customer using 900 therms of gas per year was approximately \$4.01, or \$0.33 per month.²

B. Program Administration Costs

As shown in Table 1, our total Program costs for 2019 were \$2,941,601 (the Affordability and Arrearage Forgiveness Credits plus the Program Administrative Costs). Our total Program Administration costs for the 2019 Program year were \$126,508 under the allowed 5 percent cap.

C. Tracker Balance

Because the funding for this program is volumetric, the colder than usual weather we experienced in early 2019 means that we collected more dollars than is typical. These higher collections contribute to the higher tracker balance at the end of 2019. So far in 2020, we have seen more aggressive outreach result in increased program participation and higher spending. Also, the first two months of 2020 were warmer than normal, leading to collecting fewer dollars. We expect to draw down the balance throughout 2020.

III. PAYMENT FREQUENCY, DISCONNECTIONS AND ARREARS

Below we provide the information required by Order Point No. 4 of the Commission's November 18, 2009 Order in Docket No. G002/GR-06-1429. Per Order Point No. 2 of the Commission's May 22, 2017 Order in Docket No. G002/M-16-493, we present the required information relating to customer payments, arrears and disconnection rates using both the non-GAP LIHEAP baseline approach and the pre-Program baseline approach. We summarize the 2019 results in Attachment B.³

A. Customer Payment Frequency

Table 2 below shows a comparison of the payment frequency for our 2019 GAP participants to their payment frequency while they were enrolled in the Program. We note that because we have combination electric and natural gas customers in our

² On average, an Xcel Energy residential natural gas customer in 2019 used 963 therms of natural gas, which means the program cost per customer was \$4.28 annually, or \$0.36 per month.

³ A new summary report format was proposed by the Utility Stakeholder Workgroup and approved in the Commission's September 28, 2018 Order in Docket No. G002/M-16-492. We note that this new report format replaces the attachment format originally required pursuant to the Commission's September 25, 2013 Order in Docket No. G002/GR-06-1429.

Program, our partial payment categories reflect all Program participant payments that were less than the total amount due for both electric and natural gas service during the billing period.

Our reported amounts include any participant partial- or late-payments received up to 60 days from their due dates:

Table 2: 2019 Customer Payment Frequency Comparison											
2019	Amount Paid										
GAP Program Participants	\$10,573,202	\$10,855,321	97%	82,781	101,979	81%					
Non- Participants on LIHEAP	\$17,692,587	\$17,463,498	101%4	105,729	135,870	78%					
Active Residential non GAP or LIHEAP	\$697,268,277	\$707,976,040	98%	4,352,261	4,798,303	91%					

For comparison, Table 3 below shows the customer payment frequency data for 2018.

Table 3:												
2018 Customer Payment Frequency Comparison												
		Percentage # of # of Percentage										
	Amount	Amount	Paid of	Payments	Payments	Made of						
2018	Paid	Requested	Requested	Made	Requested	Requested						
GAP Program	\$11,038,010	\$11,236,258	98%	86,648	96,056	90%						
Participants	\$11,030,010	ψ11,230,236	9070	00,040	90,030	9070						
Non-												
Participants	\$20,548,924	\$21,587,381	95%	122,967	152,034	81%						
on LIHEAP												
Active												
Residential	\$699,689,962	\$722,113,503	97%	4,244,842	4,591,591	92%						
non GAP or	\$099,009,902	\$ 722,113,303	9//0	4,244,042	4,391,391	92/0						
LIHEAP												

⁴ The percentages in this column contain customer payments and energy assistance, which is why the percentage can be over 100 percent in certain circumstances.

B. Disconnections

Table 4 shows the credit-related disconnection percentages for the required customer categories using the non-GAP LIHEAP baseline approach:

Table 4: Percentage Disconnected (Non-GAP LIHEAP Baseline Approach)										
Customer Category 2019 2018										
GAP participants	3%	2%								
LIHEAP recipients that do not participate in GAP	8%	7%								
All Residential Natural Gas Customers (non-GAP, non-LIHEAP)	1%	1%								

When comparing 2019 to 2018, we see a 1 percent increase in disconnections for GAP and LIHEAP customers and no change for residential customers.

Using the pre-Program baseline approach, we also see a decrease in disconnections. The percentage of customers disconnected pre-GAP were 7 percent and post-GAP was 2 percent.

C. Program Credits/Benefits

In this Section, we provide a summary of Program payments to participants.

Table 5:										
GAP Participants Bills and Credits										
2019 2018										
Average GAP participant annual bill	\$1,024	\$1,366								
Average GAP participant monthly bill	\$85	\$114								
Average Annual Affordability benefit	\$155	\$180								
Average Annual Arrearage Forgiveness benefit	\$390	\$200								
Average Monthly Bill Credit per participant	\$24	\$23								

The average annual Affordability and Arrearage Forgiveness Program credits are calculations of the total annual credits of each component. For the Affordability component, it is \$1,501,282 divided by 9,675 participants. The Arrearage Forgiveness component is \$1,313,811divided by 3,372 participants in arrears. The increase in arrearage forgiveness credits is due to consistent customer payments during their

enrollment and the Company matching the arrears credits earlier than 24 months. It is worth noting that not all participants receive a credit each month due to various scenarios – for example, moving, closed account, or nonpayment.

D. Arrearage Level

Table 6 shows the average arrearage levels for the identified customer categories using the non-GAP LIHEAP baseline approach:

Table 6: Average Arrearage Levels (Non-GAP LIHEAP Baseline Approach)								
Customer Category 2019 2018 (As of October 31, 2019) ⁵ (As of September 30, 2018)								
GAP Participants	\$576	\$717						
Natural Gas LIHEAP recipients not enrolled in GAP	\$566	\$512						
All Natural Gas Residential Customers (non- GAP, non-LIHEAP)	\$357	\$304						

The arrearage levels are based on a snapshot of distinct customer categories at a point in time based on whether they were active from October 1, 2018 through October 31, 2019. The average arrears levels decreased for GAP participants in 2019. The decreases can be attributed to weather, customer payment frequency, changes in usage patterns, and the timing of bill cycles.

Using the pre-Program baseline approach on the customer group who entered the GAP program during the 2019 year, we see a decrease to GAP participants' arrears levels compared to 2018, as shown in Table 7.

⁵ In late September, our billing system experienced a critical event that prevented the execution of daily billing operations. We were able to resume daily operations on September 30th, however the process to work through the backlog took multiple weeks. This critical event caused problems pulling data as of September 30, 2019. As a result, for this report only, we have substituted data as of October 31, 2019. We mention this billing system critical event in the following docket: *In the Matter of a Commission Investigation into the Effects on Electric and Natural Gas Utility Rates and Services of the 2017 Federal Tax Act*, Docket No. E,G999/CI-17-895, NOTIFICATION – 2019 TCJA REFUND (October 11, 2019).

Table 7:								
Average Arrearage Levels								
(Pre-Program Baseline Approach)								
Average Arrears for GAP Participants with active Participation	2019	2018						
Average Arrears 12 Months Prior to GAP Enrollment	\$449	\$339						
Average Arrears 12 Months Post GAP Enrollment	\$336	\$363						

Table 8 below shows the change between the total numbers of customers in arrears as of September 30, 2018 and October 31, 2019⁶ to illustrate the effect of the GAP on the number of customers in arrears.

Table 8 Program Effect on Number of Customers in Arrears									
# of Customers # of Customers % Change in # of in Arrears 2019 in Arrears 2018 Customers in Arrears									
GAP	3,372	3,717	-9%						
Non-GAP LIHEAP	6,208	6,882	-10%						
Residential	51,892	46,789	11%						

E. Coordination with Other Low-Income and Conservation Resources

Because our Personal Accounts team interacts with hundreds of low-income customers and other assistance-related organizations throughout the year, consistent with the Commission's November 18, 2009 Order in Docket No. G002/GR-06-1429, we provide a summary of our major outreach initiatives, along with ECC, rather than detailing each individual communication with these agencies:

- Dedicated internal personal account department to increase program awareness and participation;
- Updated the Xcel Energy website to allow for better access to information for Energy Assistance and Program information to households;
- Coordinated with ECC on the best approach to reach the lowest income households and highest consumption;
- ECC updated their website to accept online applications;
- Participated in quarterly MN Energy Assistance Policy Action Committee;
- Participated in Safety Net Meetings with Ramsey County throughout 2019;
- Sent mailings and outreach to eligible households identified by the Company for the Program; and

⁶ Similar to Table 6 (as explained in footnote 5), this year we used data from a month later than normal due to a critical event with our billing system.

• Conducted a dedicated Call Campaign to GAP customers who do not make their required payment within 30 days of their invoice.

Our Personal Account Representatives (PAR) team communicates daily with customers and agencies about available programs for households, including GAP. We discuss with households their ability to maintain service, how they can seek available funding through Energy Assistance, and help match them with internal programs for which they are eligible. In 2019 the PAR department received 51,276 phone calls from Minnesota agencies and households related to assistance and our programs resulting in referrals to energy assistance and bill payment assistance programs.

F. Application Processing

The Commission's December 29, 2011 Order in Docket No. G002/GR-06-1429 requires that we establish an application processing goal of processing 95 percent of all complete GAP applications within 30 days of our receipt. We met this goal in 2019.

IV. PARTICIPATION AND APPLICATION RATES, RETENTION, SATISFACTION, AND COLLECTION ACTIVITY

A. Participation and Application Rates

To provide a look at the number of LIHEAP-eligible customers who use the Program, Table 9 shows LIHEAP participation rate and the LIHEAP application rate.

Table 9:											
Program Participation and Application Rates											
Participation Rate	2019	2018									
Xcel Energy LIHEAP Recipients	19,963	21,094									
Xcel Energy GAP Participants	9,675	11,284									
Participation rate %	48%	53%									
Application Rate	2019	2018									
LIHEAP (Not Enrolled in GAP)	12,447	13,768									
Total new Households applied for GAP	2,718	2,351									
Application Rate %	22%	17%									

The Program participation rate decreased by 5 percent in 2019 compared to 2018, while the Program application rate increased by 5 percent during that same timeframe.

The application rate increase can be attributed to the fact that some of these customers previously participated in the Program in 2019, dropped out or were removed, and then were later reinstated due to additional Program funding becoming available.

B. Retention

In 2019, a total of 3,186 participants were removed from the Program for various reasons, as summarized below. In order to compare 2019 Program retention to 2018, Table 10 below shows the percent of total participants that left the Program for the various reasons in each of these years.

Table 10: Program Retention									
Program Removal Reason Number of Percentage of Tot Customers Removed Program Remova									
	2019	2019	2018						
Non-Payment	1,902	60%	57%						
Household Move	573	18%	18%						
Ineligibility or Customer Request	711	22%	25%						
Credit Balance	<u>0</u>	0%	0%						
Total	3,186	100%	100%						

Non-Payment is the primary reason participants leave the Program and this category increased by 3 percent compared to 2018. Customers are removed from the program if they do not make a monthly payment over a period of 60 days and/or two consecutive billing cycles

In 2012, we worked with ECC, the Office of the Attorney General-Utilities and Antitrust Division (OAG), and the Department of Commerce (Department) to create a new credit balance threshold that became effective with the October 26, 2012 Order in Docket No. G002/GR-06-1429. Under the 2012 agreement, we identify participants for individual review when their credit balance exceeds \$1,000. Then we bring the identified participant to the attention of ECC to develop a joint recommendation. Next, we bring the resulting recommendation to the OAG, and present the recommendation stemming from ECC, OAG, and Company involvement to the Department. When all parties have agreed on an action, we proceed with that action. In 2019, we did not pursue the removal of any customer under this agreement.

C. Customer Satisfaction

We do not conduct a specific customer satisfaction survey that addresses participation in this Program. However, we are not aware of any customer complaints made to the Company, the Commission, or ECC during the 2019 Program year by Program participants.

D. Collection Activity

While we do not have specific data regarding the Program's impact on collection activity, we believe it is reasonable to conclude from the lower disconnection percentage and the lower average arrearage level is attributable to GAP participants as compared to other customers receiving LIHEAP, that the Company may have experienced a reduction in collection activity as a result of this Program.

CONCLUSION

Xcel Energy requests the Commission to accept our Gas Affordability Program Annual Report for 2019.

Dated: March 31, 2020

Northern States Power Company

Northern States Power Company (Minnesota) Gas Utility - State of Minnesota 2019 Gas Affordability Program Tracker

	Beginning of year						2019							Current year to C	urrent life to date
	life to date	January	February	March	April	May	June	July	August	September	October	November	December	date balance	balance
2019 Low Income Discount Program															
UMC 2974 MNGVA:[*Gas Affordability	(26,383,960.50)	(495,277.41)	(511,984.31)	(515,832.59)	(301,325.37)	(179,747.94)	(91,605.45)	(63,069.67)	(55,897.65)	(56,458.12)	(114,810.50)	(245,380.91)	(404,972.41)	(3,036,362.33)	(29,420,322.83)
Manually journaled surcharge on handbilled accts	(7,947.22)	(60.79)	(50.24)	(68.95)	(71.47)	(71.69)	(56.62)	(82.38)	(67.17)	(62.73)	(59.35)	(53.96)	(70.31)	(775.66)	(8,722.88)
A Total Billed		\$ (495,338.20)	\$ (512,034.55)	\$ (515,901.54)	(301,396.84)	\$ (179,819.63) \$	(91,662.07) \$	(63,152.05) \$	(55,964.82)	\$ (56,520.85)	(114,869.85)	\$ (245,434.87)	\$ (405,042.72)		
UMC 2818 Arrearage Forgiveness MNGas:[*GAP Forgiveness	2,291,018.99	234,524.74	93,194.78	152,418.70	73,398.88	190,993.53	65,070.70	106,668.24	105,465.24	61,760.58	146,699.75	55,538.27	28,077.28	1,313,810.69	3,604,829.68
UMC 1354 Affordability Credits MNGVC:[*GAP Affordability	21,475,714.91	142,789.00	97,961.00	120,445.00	138,904.00	129,406.00	90,752.00	121,366.00	141,837.00	104,181.00	145,807.00	109,106.00	158,728.00	1,501,282.00	22,976,996.91
UMC 1354 on a GJ, not on the TAR report	68.00													-	68.00
UMC 2818 on a GJ, not on the TAR report	8.00													-	8.00
see cell notes	14,422.00														14,422.00
B Total Disbursed		\$ 377,313.74	\$ 191,155.78	\$ 272,863.70	212,302.88	\$ 320,399.53 \$	155,822.70 \$	228,034.24 \$	247,302.24	\$ 165,941.58	292,506.75	\$ 164,644.27	\$ 186,805.28	2,815,092.69	26,596,324.59
C Admin Program Costs	1,276,555.60	\$ 2,296.91	3,670.02	\$ 45,518.70	3,795.10	\$ 4,146.98 \$	7,219.74 \$	40,510.11 \$	5,662.14	\$ 4,640.06	3,157.17	\$ 2,251.60	\$ 3,639.96	126,508.49	1,403,064.09
Monthly (over) under recovery		(115,727.55)	(317,208.75)	(197,519.14)	(85,298.86)	144,726.88	71,380.37	205,392.30	196,999.56	114,060.79	180,794.07	(78,539.00)	(214,597.48)	(95,536.81)	(1,429,657.03)
Tracker Balance Asset/(Liability)	(1,334,120.22)	(1,449,847.77)	(1,767,056.52)	(1,964,575.66)	(2,049,874.52)	(1,905,147.64)	(1,833,767.27)	(1,628,374.97)	(1,431,375.41)	(1,317,314.62)	(1,136,520.55)	(1,215,059.55)	(1,429,657.03)		

Data in this Attachment is based on calendar year 2019. Where applicable, the cohort group used was 12 months prior and 12 months after program enrollment

ogram dates and status	
Date program started	2/1/2008
Program effective date	1/1/2019
Date next evaluation report due	5/31/2022
Date last evaluation completed	5/31/2019
Last evaluation docket number	G002/M-19-380
Status of program (pilot or permanent)	Permanent
Date pilot program ends, if applicable	N/A
Date of last Evaluation Order	1/17/2020
Program administrator	Energy Cents Coalition
rticipant benefits	5,7 ***
Description of affordability benefit - maximum payment as % of household income	4%
Description of arrearage forgiveness benefit - repayment period	12-24 months
	1 1 1
Average annual income per participant	\$14,498
Average annual bill per participant	\$1,024
Average arrearage balance per participant	\$202
Average annual affordability benefit per participant	\$155
Average annual arrearage forgiveness benefit per customer	\$390
Average total benefit per participant	\$288
	\$200
st and Cost Recovery	4
Annual budget	\$2,500,000
Actual revenue	\$3,037,138
Annual cost	\$2,941,601
Surcharge (\$/therm)	\$0.00445
Annual cost of surcharge for average residential customer who uses 900 therms of gas per year	\$4.01
	Residential firm, commercical firm and Commercial Demand Billed Service
Customer classes assessed the GAP surcharge	·
Tracker balance as of year-end	\$1,429,657
ticipation	
% of LIHEAP customers that participated in GAP	48%
Number of participants enrolled as of year-end	6489
Number of participants enrolled and receiving benefits at some time during the year	9675
Whether a waiting list occurred at any time during the year	No N/A
If so, the number of customers on the waiting list and for how long	N/A
pact on disconnection rates	
Disconnection rates - non-GAP LIHEAP baseline	
GAP participants	3%
Non-GAP LIHEAP customers	8%
Non-LIHEAP residential customers	1%
Disconnection rates - pre-program baseline	
GAP participant cohort	2%
GAP paticipants cohort before they were enrolled in GAP	7%
pact on payment frequency	
Pollars paid ÷ dollars requested	
Non-GAP LIHEAP Baseline	
GAP participants	97%
Non-GAP LIHEAP customers	101%
Non-LIHEAP residential customers	98%
Pre-Program Baseline	7.50
GAP participant cohort	105%
GAP participant cohort before they were enrolled in GAP	91%
lumber of payments made paid ÷ number of payments requested	
Non-GAP LIHEAP baseline	
CAD participants	81%
GAP participants	
· · ·	
Non-GAP LIHEAP customers	78%
Non-GAP LIHEAP customers Non-LIHEAP residential customers	
Non-GAP LIHEAP customers Non-LIHEAP residential customers Pre-program baseline	78% 91%
Non-GAP LIHEAP customers Non-LIHEAP residential customers	78%
Non-GAP LIHEAP customers Non-LIHEAP residential customers Pre-program baseline	78% 91%
Non-GAP LIHEAP customers Non-LIHEAP residential customers Pre-program baseline GAP participant cohort GAP participant cohort before they were enrolled in GAP	78% 91% 82%
Non-GAP LIHEAP customers Non-LIHEAP residential customers Pre-program baseline GAP participant cohort GAP participant cohort before they were enrolled in GAP act on arrears	78% 91% 82%
Non-GAP LIHEAP customers Non-LIHEAP residential customers Pre-program baseline GAP participant cohort GAP participant cohort before they were enrolled in GAP act on arrears Customers in arrears	78% 91% 82%
Non-GAP LIHEAP customers Non-LIHEAP residential customers Pre-program baseline GAP participant cohort GAP participant cohort before they were enrolled in GAP act on arrears Customers in arrears Non-GAP LIHEAP baseline	78% 91% 82% 78%
Non-GAP LHEAP customers Non-LHEAP residential customers Pre-program baseline GAP participant cohort GAP participant cohort before they were enrolled in GAP act on arrears Customers in arrears Non-GAP LHEAP baseline GAP participants	78% 91% 82% 78%
Non-GAP LIHEAP customers Non-LIHEAP residential customers Pre-program baseline GAP participant cohort GAP participant cohort before they were enrolled in GAP act on arrears Customers in arrears Non-GAP LIHEAP baseline GAP participants Non-GAP LIHEAP customers	78% 91% 82% 78% 35% 50%
Non-GAP LHEAP customers Non-LIHEAP residential customers Pre-program baseline GAP participant cohort GAP participant cohort before they were enrolled in GAP act on arrears C Customers in arrears Non-GAP LHEAP baseline GAP participants	78% 91% 82% 78%
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CERTIFICATE OF SERVICE

I, Jim Erickson, hereby certify tha	t I have this	s day served	copies o	of the	foregoing
document on the attached list of	persons.				

- <u>xx</u> by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota
- <u>xx</u> electronic filing

DOCKET NOS. G002/M-20-___ MISCELLANEOUS GAS SERVICE LIST

Dated this 31st day of March 2020

/s/

Jim Erickson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St, Louis, MO 63119-2044	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Sharon	Ferguson	sharon.ferguson@state.mn .us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Edward	Garvey	edward.garvey@AESLcons ulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Todd J.	Guerrero	todd.guerrero@kutakrock.c om	Kutak Rock LLP	Suite 1750 220 South Sixth Stree Minneapolis, MN 554021425	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Michael	Норре	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Linda	Jensen	linda.s.jensen@ag.state.m n.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Johnson	Rick.Johnson@lawmoss.co m	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Michael	Krikava	mkrikava@taftlaw.com	TAFT Stettinius & Hollister, LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Peder	Larson	plarson@larkinhoffman.co m	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Andrew	Moratzka	andrew.moratzka@stoel.co m	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
David	Niles	david.niles@avantenergy.c om	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
James M	Strommen	jstrommen@kennedy- graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas
Lynnette	Sweet	Regulatory.records@xcele nergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Miscl Gas