

Staff Briefing Papers

Meeting Date	December 19, 2019	Agenda Item **6
Company	Minnesota Power	
Docket No.	E015/M-18-250	
	In the Matter of Minnesota Power's 2018 Annual Service and Reporting Standards	
Issue	Should the Commission take any action following the third-party regulatory compliance assessment of Minnesota Power's disconnection, reporting, and payment agreements?	
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 Relevant Documents	Date
<i>Background Documents from 2018 Service Quality</i>	
Initial Filing – Safety, Reliability, and Service Quality Standards Report and Appendix A	April 2, 2018
Energy Cents Coalition – Comments	July 30, 2018
Department of Commerce – Comments	August 1, 2018
Office of Attorney General – Comments	August 15, 2018
Legal Services Advocacy Project – Comments	August 16, 2018
Minnesota Power – Reply Comments and Attachments A - F	August 20, 2018

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The attached materials are work papers of the Commission Staff. They are intended for use by the Public Utilities Commission and are based upon information already in the record unless noted otherwise.

✓ **Relevant Documents**

Date

Citizens Utility Board and Minnesota Citizens Federation Northeast – Comments	August 20, 2018
Department of Commerce – Response to Reply Comments	September 10, 2018
Office of Attorney General – Response to Reply Comments	September 10, 2018
Energy Cents Coalition – Reply Comments	September 10, 2018
Minnesota Power – Letter - Scope of Work	January 14, 2019

New Documents

Commission – Order Accepting Reports and Setting Filing Requirements	March 19, 2019
Minnesota Power – Report Regulatory Compliance Assessment + Schedules	October 18, 2019
Office of Attorney General – Comments (on Regulatory Report)	November 13, 2019
Department of Commerce – Comments (on Regulatory Report)	November 13, 2019
Energy Cents Coalition – Comments (on Regulatory Report)	November 13, 2019

I. Statement of the Issue

Should the Commission take any action following the third-party regulatory compliance assessment of Minnesota Power's disconnection, reporting, and payment agreements?

II. Background

On April 1, 2018, Minnesota Power submitted their annual Safety, Reliability, and Service Quality Report for 2018. Standards and reporting requirements are set under Minn. Rules, Chapter 7826 and in Commission orders. In the 2018 report, parties found inconsistent data and raised questions regarding Minnesota Power's disconnection and reconnection practices. Minnesota Power agreed to a third party compliance assessment.

On April 11, 2019, the 2018 service quality portion came before the Commission. The Commission did not take immediate action on the questions raised and agreed that a third-party compliance assessment would be valuable.

On January 14, 2019, MP filed the scope of work for the third party review.

On October 18, 2019, Minnesota Power filed the Regulatory Compliance Assessment in response to parties' previous concerns.

On October 22, 2019 the Commission opened a comment period on the report asking parties whether the report raises concerns of MP's practices.

On November 13, 2019, Energy Cents Coalition, the Department of Commerce, and the Office of the Attorney General submitted comments.

On November 22, 2019, MP submitted reply comments responding to each party.

III. Summary of the Regulatory Compliance Assessment Report

The scope of work for MP's regulatory review was developed collaboratively with ECC and the OAG that included a compliance review and assessment of MP's payment agreements, disconnection, reconnection, and practices related to Cold Weather Rule and compliance reporting.¹

After listing the many resources that were reviewed, such as employee interviews, employee trainings, customer data related to credit and collections and internal policies and procedures, the firm conducting the review stated that it "believes that the Commission and parties can have confidence that MP's credit and collection processes and procedures provide a platform that fully encourages and enables on-going compliance with Minnesota Statutes and Rules."² Additionally, they noted MP's efforts over the past few years to reorganize its

¹ The scope of work was filed in the docket on January 14, 2019.

² Minnesota Power, Regulatory Compliance Assessment at 6 (October 18, 2019).

credit and collection structure, new leadership, the creation of new positions with direct responsibility over reporting, and an organizational structure with clearly defined roles and accountability.³

Reporting Review

The firm reviewed MP's processes on how it tracks and stores information about disconnections, reconnections, and payment agreements in its Customer Care & Billing System (CC&B).⁴ The review included any changes made to data collection or data handling that occurred during the time period and the reason for such changes.⁵ It is also noted that MP implemented a new CC&B system in 2015 that retains very detailed information on customer accounts and is able to produce various reports.⁶

MP acknowledged that inconsistent disconnection and 24-hour reconnection data was reported in 2015 and 2016. Multiple reasons included employees recording different dates for the disconnection (i.e. entered into the system by personnel vs. when the disconnection occurred in the field) and the implementation period of the CC&B very likely impacted or skewed some 2015 reporting metrics.⁷ Moving forward, these errors will not "recur and the Company's recent reports have been consistent, and from our review, appear accurate."⁸

MP also acknowledged the untimely filing of monthly and weekly reporting for much of 2017 due to "key employee turnover and internal miscommunication."⁹ As noted earlier, MP has made changes to address these shortfalls and "has complied with the applicable filing requirements since these earlier missteps."¹⁰

The firm concluded that it "was able to reconcile the two different sets of numbers at issue and, more importantly, was able to verify accuracy of other more recently reported numbers."¹¹

Payment Agreements

MP's credit and collection procedures were reviewed, both generally and those related to Cold Weather Rule (CWR) payment agreements. The firm reviewed and summarized MP's

³ Minnesota Power, Regulatory Compliance Assessment at 9 (October 18, 2019).

⁴ *Id.*

⁵ *Id.* at 11.

⁶ *Id.* at 10.

⁷ *Id.* at 12.

⁸ *Id.* at 15.

⁹ *Id.* at 16.

¹⁰ *Id.*

¹¹ *Id.* at 17.

payment agreement processes for non-CWR months and CWR months.¹² Below are the key dates and associated activity identified for non-CWR.

Day 1	Bill issued to customer
Day 30	Next monthly bill issued to customer
Day 54	Customer over debt threshold enters collections process and receives both an Interactive Voice Response (“IVR”) call to the account primary phone number and a past due notice reminder mailed to the listed mailing address
Day 60	Next monthly bill issued to customer
Day 69	Customer enters pre-disconnection process and another IVR call is made to the account primary phone number and another past due notice reminder is mailed to the listed mailing address
Day 81	Customer is scheduled for disconnection

If at any point a customer contacts MP to enter into a payment agreement, MP proceeds differently according to where the customer is in the disconnection process. Parties had issue with MP’s requirement of full payment when a customer has been disconnected and wishes to be reconnected since this is not a payment agreement and does not take a customer’s financial situation into account as required by Minn. Statute § 216B.098, subd. 3.¹³ However, MP believes that payment agreements are required when customers are receiving service and not for customers who require reconnection of service before noting their tariff that specifically states the “Company shall reconnect service following disconnection for non-payment only after all past due accounts, deposits and reconnection fees, where applicable, shall have been paid.”¹⁴ The firm concluded that if the Commission believes MP’s practices are in violation of the statute, then the Commission must approve a revision of MP’s Electric Rate Book since the language there would also be in violation.¹⁵

Employees have great latitude and judgment in negotiating payment agreements with customers and there is no formal policy because of this. It allows for flexibility and unique agreements that match the abilities and needs of MP’s customers. The Company’s guidelines are included as an attachment to the third-party review – please see Schedule 3.

The review found that CWR payment agreements encompass a “significantly longer period of time (e.g. averaging over 100 days for CWR PAs entered into in October 2017 through January

¹² Minnesota Power, Regulatory Compliance Assessment at 18-25 (October 18, 2019).

¹³ *Id.* at 19-20.

¹⁴ *Id.* at 20.

¹⁵ *Id.* at 20-21.

2018 for customers in the 31 to 60 day arrearage “bucket,” versus averaging under 15 days for Summer PAs entered into in May through September 2018 for customers in that same group).¹⁶ This “suggests genuine negotiation, leading to significantly different outcomes customer-by-customer” which should be the principle outcome of Minn. Statute § 216B.098, subd. 3.¹⁷

Impacts to Customers

The firm provided several analyses and graphs concerning their examination of aggregate data. “Overall, while certain data prompted follow-up inquiry, such as the disconnection spike in 2017 or the high past due balances of some accounts, the Firm’s review of the aggregate data failed to identify any issues that raised compliance concerns.”¹⁸

Customer data was also collected from 380 randomly identified customers that were 60+ days in arrearages. Review of this data did not provide any compliance concerns.¹⁹ Three customers who MP had extensive contact with were summarized on pages 43-63 of the report.

In another effort, call recordings were also assessed from 100 randomly selected customers producing 562 recordings or about 50 hours.²⁰

The firm did not “identify any systemic compliance concerns related to MP’s interactions with its past due customers during the relevant time period ... from the aggregate data, the most notable trend over the course of the review period is a marked reduction in the length of disconnections.”²¹ It was found that MP has “substantial interaction” with its customers, with “much of it automated” and “call recordings demonstrated substantial and meaningful interaction between the Company and its customers.”²² Employees complied with Company policies, procedures and guidelines, and in conformance with Minnesota Statutes and Rules.²³

Conclusion

As noted earlier and repeated by the firm:²⁴

This Assessment did not identify any current or on-going systemic compliance concerns regarding MP’s credit and collections, disconnection or reconnection efforts. The Assessment verified failures to file accurate

¹⁶ Minnesota Power, Regulatory Compliance Assessment at 15 (October 18, 2019).

¹⁷ *Id.*

¹⁸ *Id.* at 41.

¹⁹ *Id.*

²⁰ *Id.* at 63.

²¹ *Id.* at 65.

²² *Id.* at 66.

²³ *Id.*

²⁴ *Id.* at 67.

information with the Commission in 2015 and 2016 and failures to file timely information with the Commission in 2017. MP has taken concrete steps to avoid such failures in the future.

The legal question remains for the Commission as to whether MP's payment agreement policies in non-CWR months violates Minnesota Statutes. If so, modifications to MP's Commission-approved tariff would likely be needed.

IV. Parties' Comments

1. Energy CENTS Coalition

The Energy CENTS Coalition (ECC) filed comments on November 13, 2019. They expressed their agreement with the report's findings:²⁵

The assessment found that MP's collection practices fully comply with Minnesota Statutes and Rules. The report also satisfies ECC's original concerns about the Company's reporting inaccuracies and failures to file timely, required service disconnection information. Given the changes the Company has made—dedicating staff positions responsible for ensuring accurate and timely reporting, establishing consistent data points and enhancing internal communication—ECC shares the Firm's confidence that the Company's future reporting will be accurate, consistent and filed in a timely manner.

ECC clarified their position related to MP's implementation of payment plans as part of Minn. Statute § 216B.098, subd. 3: A utility shall offer a payment agreement for the payment of arrears. Payment agreements must consider a customer's financial circumstances and any extenuating circumstances of the household. No additional service deposit may be charged as a consideration to continue service to a customer who has entered and is reasonably on time under an accepted payment agreement.

The organization's concern focused on "the Company's practice of requiring full payment on a past-due bill *before* that customer was disconnected," which ECC believes is in violation of subdivision 3.²⁶ The organization discussed this concern with MP. In response, the Company has agreed to offer payment agreements to all past-due customers including those who are scheduled for but have not been disconnected.²⁷

²⁵ Energy Cents Coalition Comments at 1 (November 13, 2019).

²⁶ *Id.* at 2.

²⁷ *Id.*

ECC determined that “because MP has agreed to change this particular collection practice,” it “does not dispute the Company’s compliance with the payment agreement statute or any of the other relevant consumer protection statutes and rules.”²⁸ ECC believes the Commission should accept the report and “commend the effort of both the Firm and the Company for the thorough assessment of MP’s collection practices and reporting procedures, and find that no further action is required.”²⁹

2. The Department of Commerce – Division of Energy Resources

The Department of Commerce – Division of Energy Resources (the Department) submitted comments in this docket on November 13, 2019 that were generally agreeable to the report. “While W&W did identify concerns related to MP’s data reporting to the Commission, the Firm appears confident that these concerns have been adequately addressed.”³⁰ The Department highlighted the same need for clarification that both the report stated and ECC addressed above. That is, clarity regarding the interpretation of the payment plan statute. The report suggests “that the Commission may want to make a legal determination as to whether the Statute requires Minnesota utilities to offer payment plans to disconnected customers.”³¹ The Department pointed to two areas of the report as the “sole remaining issue to be addressed by the Commission,” first from page 26:³²

The Commission will need to determine whether MP’s Summer [Payment Agreement] process complies with Minn. Stat. § 216B.098, subd. 3. If the Commission determines that it does not comply, the Commission must also approve a change to MP’s tariffs as the Company’s practice with respect to disconnected customers complies with its current Commission approved tariff.

And, secondly, from page 67:

The Assessment also notes the legal question for the Commission to address regarding the interpretation of Minnesota Statutes §

²⁸ *Id.*

²⁹ Energy Cents Coalition Comments at 2 (November 13, 2019).

³⁰ Department of Commerce Comments at 1 (November 13, 2019). W&W refers to the firm Winthrop & Weinstine that completed the third-party review.

³¹ Department of Commerce Comments at 1 (November 13, 2019) and Minnesota Power Regulatory Assessment Report at 26 (October 18, 2019).

³² Department of Commerce Comments at 2 (November 13, 2019)

216B.098, subdivision 3, concerning payment agreement requirements, which, depending on the Commission's resolution, may require amendment of the Company's currently-approved tariffs.

The Department referenced their analysis of the statute from their September 10, 2018 comments:

Upon reviewing the statute, the Department observes that careful reading of the statute indicates that requiring payment in full prior to reconnection does not necessarily violate this statute. For example, if a customer is in arrears, MP must offer a payment agreement that considers the "customer's financial circumstances and any extenuating circumstances of the household." If such a customer enters into a payment agreement and is later disconnected during non-CWR [Cold Weather Rule] months due to not being "reasonably on time under an accepted payment agreement," the statute doesn't prohibit MP from requiring payment in full prior to reconnection during non-CWR months. Thus, Minn. Stat. 216B.098 is vague enough that reasonable parties may interpret it differently as to its application during non-CWR months. In contrast, the CWR statute (Minn. Stat. 216B.096) is not vague on this front, as it requires utilities to offer payment plans to disconnected customers during the CWR months.

...the Department is sympathetic to the Consumer Advocates' arguments, not due to statutory reasons, but instead due to reasons of public policy. If MP's practice is to ask disconnected low-income customers to pay for their balance in full prior to being reconnected, rather than, say, enter into a new payment plan, such a policy seems to emphasize punishment over resolution, particularly if customers did not previously enter into payment plans (for whatever reason), or if customers have been reasonably on time in payments in the past. As Minnesota Power has recognized, "The disconnection of a customer's service is the Company's most costly course of action and therefore, disconnection is the Company's last resort in remedying past due payments."

...if it's okay that one day a customer may enter into a payment plan, and the next day may not because they've been disconnected, *even though they may owe the same amount on each day*, there must be a meaningful difference between those customers to warrant the disparity in treatment.

...MP appears to be offering the justification that the disconnected customer has had multiple instances to enter into a payment arrangement and has not pursued them. However, the Department would argue that being disconnected may provide the necessary motivation for the customer to finally enter into a payment arrangement or even enter into a new payment agreement. Therefore, if a disconnected customer is willing to enter into a payment agreement, there is no meaningful difference between the connected and disconnected customers. Further, being disconnected is already a significant punishment for failing to enter into a payment plan; requiring balance paid in full on top of disconnection not only adds a second layer of punishment but doesn't seem practical.

The Department concludes that the Company has not offered a meaningful distinction between connected and disconnected customers that justifies why one but not the other should be permitted to enter into a payment plan. Further, the Department concludes that Minnesota Power's policy of requiring balance paid in full prior to reconnection is overly punitive especially towards first-time disconnections and towards customers who become motivated to enter into a payment plan once disconnected.

The Department's recommendation remains unchanged from their September comments: "while requiring disconnected customers to pay their balance in full prior to reconnection does not necessarily violate Minnesota Statutes § 216B.098, subdivision 3, doing so for all customers may be overly punitive from a public policy perspective."³³ The Commission should "direct Minnesota Power to propose tariff amendments that would require Minnesota Power to offer payment plans to disconnected customers during non-Cold Weather Rule months, unless that customer has a history of repeatedly breaking payment plans or repeatedly being disconnected for nonpayment."³⁴

3. Office of the Attorney General

The Office the Attorney General — Residential Utilities and Antitrust Division (OAG) filed comments on November 13, 2019 explaining that MP "should change its policy of requiring disconnected customers to pay their past due amounts in full prior to being reconnected and to ask the Commission to stay imposition of penalties for violations

³³ Department of Commerce Comments at 5 (November 13, 2019).

³⁴ *Id.*

of the statutes requiring monthly and weekly reports on past due accounts and disconnections.”³⁵

“With respect to the accuracy of disconnection and reconnection data, as well as the timeliness of the reporting, the Report identified multiple shortcomings. Specifically, the Report found that historically ‘MP lacked a consistent methodology or consistent definitions related to its recording (and therefore reporting) of disconnections and reconnections,’ and that this led to inaccurate and inconsistent data being filed with the Commission.”³⁶ The OAG noted that many of monthly or weekly MP’s reports in 2017 were not filed in a timely manner as required by statute, but that MP has resolved any previous issues through the creation of a new position that ensure timely and accurate filings.³⁷

The OAG then provides their recommendation that “the Commission should amend the Company’s tariff to end Minnesota Power’s unlawful practice of requiring full payment prior to reconnecting disconnected customers” and “stay imposition of a penalty for Minnesota Power’s untimely and inaccurate filings in violation of Minnesota law.”³⁸

The OAG contended that MP’s practice of requiring payment in full before reconnection violates the requirements of Minn. Statutes § 216b.098, subd. 3 as it is not a payment agreement. Moreover, MP applies this policy to all customers, which further violates the subdivision, which requires the utility to consider a customer’s financial circumstances and any extenuating circumstances.³⁹

In acknowledgement of MP’s stance that the use of “continue service” in subd. 3 does not apply to reconnecting customers, the OAG simply stated that this phrase instead prohibits “the utility from requiring an additional service deposit as consideration for continuing service to a customer” and does not prevent a utility from offering payment plans or to consider a customer’s financial situation.⁴⁰

“The spirit of the law is to provide relief for households that are struggling so much with their day-to-day expenses that they have fallen behind on their utility bills. These households should not be left literally in the dark because of an inability to make full payment once they have agreed to a plan that will allow them to pay off those obligations over time.”⁴¹

³⁵ Office of the Attorney General Comments at 1 (November 13, 2019).

³⁶ Office of the Attorney General Comments at 3 (November 13, 2019).

³⁷ *Id.*

³⁸ *Id.*

³⁹ *Id.* at 4.

⁴⁰ *Id.*

⁴¹ *Id.*

For the second recommendation, the OAG referred to the monthly and weekly reporting obligations set forth in Minn. Statutes § 216B.091 and § 216B.906, subd. 11. Since the third-party review found both reporting inaccuracies and untimely filings of these statutorily imposed reporting obligations, the OAG stated that it is logical that this “constitutes a violation of Minnesota law” and the remedy is “codified in Minnesota Statutes section 216B.57 as a “penalty of not less than \$100 nor more than \$1,000 for each violation.”⁴² Therefore, the “Commission should issue a finding that Minnesota Power has violated its statutory reporting obligations, and should stay imposition of any penalties at this time.”⁴³ And although MP has remedied the situation, the OAG declares that “by conditioning the stay upon the Company’s continued compliance with statutory reporting obligations, the Commission could enhance the deterrent effect of any fine by putting Minnesota Power on notice that future violations could result in both penalties for those future violations and the previous violations found in the report.”⁴⁴

4. MP Reply Comments

The Company provided reply comments on November 22, 2019. MP echoed the discussions and agreement that took place with ECC to provide payment agreements to all past due customers including those not yet but scheduled for disconnection throughout the year.⁴⁵ The Company explained historically this has been the practice during Cold Weather Rule (CWR) months, but they are willing to extend this to the full year to include non-CWR months with “the shared understanding and assumption that the customer did not break a payment agreement that was made specifically to avoid the scheduled disconnection.”⁴⁶

The Company said it could appreciate the Department’s thought that disconnection can lead a customer to establish payment arrangements, even after the multiple efforts MP undertakes before disconnection occurs.⁴⁷ MP took issue with the Department referring to MP’s practices as punishment as disconnecting a customer for nonpayment with notice is well within their power and allowed through Minnesota Rules. MP goes “to great lengths to work with customers and repeatedly encourages customers to set up and keep a payment agreement throughout the credit and

⁴² *Id.*

⁴³ *Id.*

⁴⁴ Office of the Attorney General Comments at 6 (November 13, 2019).

⁴⁵ *Id.* at 2.

⁴⁶ *Id.* at 3.

⁴⁷ *Id.*

collections process.”⁴⁸ In response to the Department’s conclusion that MP did not provide a meaningful distinction on the difference between a connected and disconnected customer and why one, but not other may enter into a payment plan, MP does believe there is a distinction between a connected and disconnected customer found in Minnesota Statutes and Rules, but not distinction between “first time occurrence” and subsequent occurrences.⁴⁹

The Company acknowledged the OAG’s comments and disagrees that MP’s practices are unlawful or their reporting inaccuracies and missed filing merit penalties.⁵⁰ The third-party review “was in the spirit of transparency and sought to provide assurances, or insight into potential areas for improvement, using an independent third party that was mutually agreeable.”⁵¹ Additionally, as MP points out, the report found that the Company has corrected and improved reporting areas “to provide confidence in its reporting processes” and the “detailed review did not identify any current or on-going systemic compliance concerns.”⁵²

MP appreciated the collaborative effort of all involved and recommended the Commission accept the report and find that no further action is needed, as suggested by ECC.⁵³

V. Staff Analysis

1. MP Agreement to Offer Payment Plans in Non-CWR Months

If a customer has not previously broken a payment agreement that was made to avoid a scheduled disconnection, MP has agreed to provide payment agreements to all past due customers including those not yet but scheduled for disconnection throughout the year. Understanding this is the new practice, staff believes that MP needs to file language modifying their tariff. If this is not correct, MP should clarify why new tariff language is not necessary.

2. Remaining Issue for the Commission

The remaining issue for consideration is whether violations should be assessed as the OAG recommends for the untimely and inaccurately reporting. Although corrected,

⁴⁸ *Id.*

⁴⁹ Minnesota Power Reply Comments at 3 (November 22, 2019).

⁵⁰ *Id.* at 4.

⁵¹ *Id.* at 3.

⁵² *Id.* at 4.

⁵³ *Id.*

does the Commission wish to assess some form of penalty if there are future reporting issues?

It is staff's understanding that both the Department and ECC are satisfied with the changes made by MP in reporting activity and providing payment agreements to all customers throughout the year and neither recommended penalties. From staff's perspective, it does not appear that MP attempted to evade reporting or give incorrect information to the Commission.

If the Commission is not ready to assess penalties but wants further assurances that incorrect reporting will not happen in the future, it could, for example, direct MP to raise in a future electric service quality docket whether it should conduct a follow up third party audit. MP stated that the errors were due to key employee turnover and internal miscommunications, which can happen in any organization at any time. One option is for the Commission to direct MP to discuss, in its electric service quality filing due April 1, 2022, whether it should conduct a follow up third-party audit to ensure these problems have not continued. Staff neither recommends nor opposes this option, but just raises it as a possible path for the Commission to consider.

3. Third Party Review For Other Utilities

Staff raises an idea for the Commission's consideration: that Xcel and OTP also undertake a similar review of their disconnection policies and procedures. The review of MP's disconnection policies was, in staff's view, a useful exercise, and consistent with the principle that occasional reviews of utility practices can help ensure continued high standards. While there is reason to suggest that a review be made of both OTP's and Xcel's disconnection practices, there is stronger rationale for a review of Xcel's, since its pending PBR docket will rely heavily on the data Xcel reports to the Commission.⁵⁴

With that being said, staff realizes no party raised this idea and so it is a new proposal. The Commission may choose to wait on the idea until such time that parties have had a chance to weigh in, may grant oral argument on the topic, or may choose not to take up the idea. Staff also shared this suggestion in the 2019 Service Quality dockets if the Commission wishes to discuss this idea further with the parties involved.

⁵⁴ Staff would also suggest that the same entity that performed the MP review also perform the review of Xcel and OTP's policies, since that entity may have experience and knowledge it can transfer to these new reviews.

VI. Decision Options

1. Accept Minnesota Power's Regulatory Assessment Report (*MP, Department, ECC*)
2. Direct Minnesota Power to propose tariff amendments that would require Minnesota Power to offer payment plans to disconnected customers during non-Cold Weather Rule months, unless that customer has a history of repeatedly breaking payment plans or repeatedly being disconnected for nonpayment. Further direct this tariff language to be filed within 60 days of the date of the Commission's order in this docket. (*Department*) (*Staff note: this decision option makes no finding on compliance or violation of state statute.*)
3. Stay imposition of a penalty for violation of the Company's reporting requirements conditioned upon continued compliance in the future. (*OAG*)
4. Direct MP in its electric service quality filing due April 1, 2022 to discuss whether it should be required to conduct a third-party audit as a follow up to the audit conducted in Docket 18-250. (*Not proposed by any party; staff option for Commission consideration.*)
5. Make some other finding(s).