



November 15, 2023

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 250  
St. Paul, MN 55101

**VIA E-FILING**

**RE: In the Matter of a Petition for Approval of a Modification to Low-Income Discount Program  
In the Matter of a Petition for Approval of Low Income Energy Discount Rider Funding**

**PUC Docket Number(s): E-002/M-04-1956; E-002/M-10-854**

Dear Mr. Seuffert:

Enclosed please find the Reply Comments of the Energy CENTS Coalition in the above-referenced matter(s). An Affidavit of Service is also enclosed.

If you have any questions, please call me at (651) 470-4500 or via electronic mail at [paym@energycents.org](mailto:paym@energycents.org).

Thank you for your consideration.

Sincerely,

Pam Marshall  
Interim Executive Director  
Energy CENTS Coalition

**State of Minnesota**  
**Before the Public Utilities Commission**

Katie Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

In the Matter of a Petition for Approval of  
a Modification to Low-Income Discount Program

Docket No. E-002/M-04-1956

In the Matter of a Petition for Approval of Low  
Income Energy Discount Rider Funding

Docket No. E-002/M-10-854

**Reply Comments of the Energy CENTS Coalition**

**I. INTRODUCTION**

The Energy CENTS Coalition (“ECC”) appreciates the opportunity to provide additional comments in this matter. ECC continues to support the Company’s proposal to transfer \$5.6 million from the Medical Assistance Program (“MAP”) to Power ON. Further, ECC respectfully requests the Commission establish a separate Power ON budget to sustain current participation levels. As discussed in more detail below, ECC supports establishing an annual Power ON budget of \$14.5 million. These comments also include ECC’s responses to the Minnesota Department of Commerce - Division of Energy Resources (“Department” or “DER”) comments submitted on October 25, 2023.

**II. BACKGROUND**

In 2005, to ensure compliance with new requirements in Minn Stat. §216B.16 Subd.14., the Commission issued an Order approving changes to Xcel’s low-income discount program. Under that statute, Xcel is required to offer both a low-income discount (now \$15/month) to all LIHEAP customers with household members over age 62 or with disabled members and an affordability program (now Power ON). In that Order, the Commission stated: “the amount of funds available for the discount program shall be the amount currently received from the surcharge until Xcel can demonstrate that additional funding is required.”<sup>1</sup>

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<sup>1</sup> Order, In the Matter of a Petition to Revise Xcel’s Low-Income Discount Program to Comply with Modifications in Minn. Stat. §216B.16 Subd.14, Docket No. E-002/M-04-1956, April 26, 2005 (Order Pt. 2).

The Commission also stated:

To the extent that the program's costs exceed its revenue in any given LIHEAP fiscal year, Xcel should recover the balance from the following year's surcharge revenues and reduce the amount of benefits provided in the following year to compensate. These policies will help ensure that the benefits provided by the Low-Income Discount Program are timely matched to the resources made available for the program that year ... Xcel will need to plan the program's budget accordingly.<sup>2</sup>

In 2010, Xcel sought a program surcharge increase to cover a negative tracker balance and to increase funding for Power ON. On January 28, 2011, the Commission approved the requested increase.<sup>3</sup> At that time, Xcel explained the difference between the two program components (the discount and Power ON), stating "in contrast to the discount program, [the Company] does have some ability to manage participation in the PowerON program. Xcel reported that when current participants are removed from the [Power ON] program for various reasons, it has the discretion both to discontinue its active promotion of the program, and to decline to accept new participants."<sup>4</sup>

The reason that Xcel does not have similar discretion regarding the discount program is based on the provisions of Minn Stat. §216B.16 Subd.14. That statute states, in part:

A public utility shall fund an affordability program for low-income customers at a base annual funding level of \$8,000,000 ... For the purposes of this subdivision, "low-income" describes a customer who is receiving assistance from the federal low-income home energy assistance program [LIHEAP]. The affordability program must be **designed** to target participating customers with the lowest incomes and highest energy costs in order to lower the percentage of income they devote to energy bills ... For low-income customers who are 62 years of age or older or disabled, the program must **include** a \$15 discount in each billing period (emphasis added).

In other words, Xcel is required to first fund the discount component of their low-income affordability program. The Commission has repeatedly acknowledged that "the Company implements its affordability program with two components."<sup>5</sup> In 2013, the Commission responded to ECC's testimony, noting that one of [those] two programs, Power ON, [had] been closed to new participants since September 2012 to avoid overspending available ... funds."<sup>6</sup> In that matter, the Commission concurred with ECC that an increase to the Power ON funding level and a dedicated source of funding for the program was appropriate. The Commission approved a "\$3,200,000-per-year budget increase for a separately funded

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<sup>2</sup> *Id.* at 6.

<sup>3</sup> ORDER APPROVING INCREASE IN COST RECOVERY FOR ELECTRIC LOW INCOME ENERGY PROGRAM, In the Matter of a Petition by Northern States Power d/b/a Xcel Energy for Approval of its Electric Lower Income Program Meter Surcharge, DOCKET NO. E-002/M-10-854, January 28, 2011.

<sup>4</sup> *Id.*

<sup>5</sup> FINDINGS OF FACT, CONCLUSIONS, AND ORDER, 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-12-961, September 3, 2013.

<sup>6</sup> *Id.*

PowerON program ... and require[d] the ... Company ... to segregate and separately track the additional \$3,200,000 increase in funding from the other money it collects through the low-income affordability surcharge and to use this money only for the PowerON program.”<sup>7</sup>

Xcel’s current petition demonstrates the need for additional funding for the Power ON program. Both the low-income discount and Power ON programs are operating at historically high levels. Compared to 2021, the number of customers receiving the low-income discount in 2022 increased by 7,651 households “for a record total of 38,941.”<sup>8</sup> As of September 2023, a record high 22,887 customers were enrolled in Power ON.<sup>9</sup>

The participation level increases are depicted in the tables below:<sup>10</sup>

### Discount Program Participation

Program Year	Eligible Households
2017-18	31,061
2018-19	32,756
2019-20	30,607
2020-21	31,290
2021-22	38,941

### PowerON Participation

Program Year	Participants <sup>12</sup>
2017-18	12,587
2018-19	17,828
2019-20	18,561
2020-21	18,550
2021-22	19,600

**Current**

**22,887**

The current program participation levels demonstrate a need for these programs. As discussed further below, the current funding levels are insufficient to meet that need.

### III. DISCUSSION

The information below shows the current available funding and expenditures for the low-income discount and Power ON programs:

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<sup>7</sup> *Id.*

<sup>8</sup> Xcel Energy, 2022 ANNUAL REPORT: ELECTRIC LOW INCOME ENERGY DISCOUNT PROGRAM DOCKET NOS. E002/M-04-1956 AND E002/M-10-854, December 1, 2022.

<sup>9</sup> ECC Database report.

<sup>10</sup> Xcel Energy, 2022 ANNUAL REPORT: ELECTRIC LOW INCOME ENERGY DISCOUNT PROGRAM DOCKET NOS. E002/M-04-1956 AND E002/M-10-854, December 1, 2022.

**Xcel Energy Low-income Program Revenue and Expense (10/31/2022)**

	<u>Low Income Discount</u>	<u>Power ON<sup>11</sup></u>
Revenue	\$8,517,294	\$2,968,156
Expense	\$5,364,559	\$8,306,407

Based on the amounts above, the annual expense for the discount is \$6.44 million and \$9.97 million for Power On. The current annual expense for Power On, however, is significantly higher because participation levels have increased since October 2022. Xcel estimates current annual Power On expense of \$14.5 million.<sup>12</sup>

The current, combined revenue for both programs is about \$13.7 million. Given current spending levels, however, the required revenue amount is \$21 million (\$6.44 million for the discount and \$14.5 million for Power ON = \$20.94 million). Establishing a \$14.5 million Power ON budget and, with a revenue level of \$10 million for the discount, would provide \$24.5 million in annual revenue for both programs. While setting the annual revenue at \$24.5 million may yield a combined net revenue amount of \$3.5 million, ECC believes that a potential surplus amount is appropriate.

The potential for net revenue is appropriate for several reasons. First, because the number of Xcel Energy’s LIHEAP customers has increased, more customers are eligible for both the discount and for Power ON.

**Xcel Energy LIHEAP Customers<sup>13</sup>**

2020	48,973
2021	47,924
2022	56,254

Second, as shown in Attachment A, the combined discount and Power ON program tracker balance is negative. Third, a record number of customers are participating in both programs. Fourth, the current average monthly Power ON credit amount (affordability and arrearage credit) has increased to \$100.57 compared to \$84 in 2022. Fifth, the Power ON surcharge amount has not been increased since January 1, 2014.<sup>14</sup> Finally, if the Power On tracker balance exceeds \$5 million after operating for two years at a \$14.5 million annual budget, Xcel proposes to transfer \$2 million surplus Power ON revenue to provide a supplemental benefit to discount program participants.

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<sup>11</sup> Xcel Energy, 2022 ANNUAL REPORT: ELECTRIC LOW INCOME ENERGY DISCOUNT PROGRAM DOCKET NOS. E002/M-04-1956 AND E002/M-10-854, December 1, 2022.

<sup>12</sup> In Xcel’s October 25, 2023 Comments, the Company proposed a \$14.5 million *increase* to Power ON. It is ECC’s understanding that the Company will modify this request in Reply Comments to establish an annual Power ON *budget* of \$14.5 million.

<sup>13</sup> Xcel Energy, 2022 ANNUAL REPORT: ELECTRIC LOW INCOME ENERGY DISCOUNT PROGRAM DOCKET NOS. E002/M-04-1956 AND E002/M-10-854, December 1, 2022.

<sup>14</sup> Order, Docket No. 12-961, September 3, 2013.

ECC believes a long-term funding solution is required to ensure the level of funding for these programs is adequate to meet the demonstrated need.

#### IV. RESPONSE TO THE DEPARTMENT

ECC respectfully disagrees with the Department's recommendation for a solution to the inadequate low-income program funding levels. The Department states that "one solution is to combine all three budgets into one, which is already the case with PowerOn and Discount [programs]. Then, the overall recovery amount can be adjusted to meet the needs of each program."<sup>15</sup> As discussed above, and acknowledged by the Department, Xcel is obligated to enroll all eligible customers in the discount program. As such, and as noted by the Department, there is no actual annual budget for the discount program.<sup>16</sup>

Further, each of Xcel's programs currently has a dedicated recovery amount. From ECC's perspective, the most efficient solution is to increase the surcharge for Power ON. In addition, it is now ECC's understanding that Xcel is not seeking an *increase* of \$14.5 million for Power ON. Instead, the Company is requesting a \$14.5 million annual Power ON budget. Xcel notes that, to meet the participation and spending amounts for Power ON, the residential surcharge should increase by \$.083 per month.<sup>17</sup> This surcharge amount will be lower since Xcel is seeking to establish a \$14.5 million Power ON annual budget and is not requesting a \$14.5 million annual increase to the program.

Since filing the initial petition, Xcel Energy, ECC, and CUB worked together to establish a proposal for treating any potential surplus funds in Power ON. In an update provided in their October 25, 2023 comments, Xcel states: "In the event ... that two years after the requested \$14.5 million increase to the Power ON Program, its tracker balance exceeds \$5.0 million, the Company proposes to transfer \$2.0 million from the Power ON Program at the end of the federal fiscal year. This \$2.0 million will supplement the current \$15 monthly discount."<sup>18</sup>

According to the Department, Power ON could "continue without interruption even if the combined PowerOn and Discount tracker were to be depleted."<sup>19</sup> The Commission has determined, however, in related decisions, that low-income program spending and revenue should be "timely matched" consistent with program budgets. While a negative tracker balance may have seemed less problematic when spending for Power ON was \$3.6 million per *year*, the program is now spending \$1.5 million per *month* (Attachment A). ECC does not believe that a foreseeable, ongoing, and significant negative Power ON tracker balance is appropriate.

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<sup>15</sup> Comments of the Minnesota Department of Commerce, Docket Nos. E002/M-04-1956 and E002/M-10-584, October 25, 2023, p. 6.

<sup>16</sup> *Id.* at 3, Table 2.

<sup>17</sup> Xcel Energy Comments, Docket Nos. E002/M-04-1956 and E002/M-10-584, October 25, 2023, p. 6.

<sup>18</sup> *Id.* at 4.

<sup>19</sup> Department of Commerce Comments, Docket Nos. E002/M-04-1956 and E002/M-10-584, October 25, 2023, p. 6.

Finally, the Department acknowledges that “the most apparent concern is the long-term funding of the PowerOn program at current participation and funding levels. If the Company’s request [to transfer \$5.6 million of MAP funds to Power ON] were approved, it would represent a temporary fix.”<sup>20</sup> ECC agrees that a long-term solution is necessary. While ECC is not opposed to granting Xcel some flexibility in the use of the overall low-income electric affordability program, combining inadequate levels of revenue does not address the ongoing funding level shortfalls. At current spending levels, Power On requires an annual budget of \$14.5 million.

As noted in ECC’s initial comments, nearly 70% of all Power ON participants live below the federal poverty level and, before participating in the program, devote 13% of their household income to electric costs. These customers are the most vulnerable to the consequences of unaffordable energy bills, particularly service disconnections. ECC respectfully requests the Commission fully fund this program at an annual budget of \$14.5 million.

## V. CONCLUSION

In initial comments, ECC recommended the Commission:

- 1) Approve Xcel Energy’s request to transfer \$5.6 million from the Medical Assistance Program to the Power ON program.
- 2) Approve Xcel Energy’s request to increase the Power ON annual budget by \$14.5 million.
- 3) Approve Xcel Energy’s request to transfer \$2 million from Power ON to low-income discount recipients if the Power ON tracker balance exceeds \$5 million at the end of the federal fiscal year.

In these comments, ECC makes the following modifications to our initial recommendations:

- 1) Approve Xcel Energy’s request to transfer \$5.6 million from the Medical Assistance Program to the Power ON program.
- 2) Approve Xcel Energy’s request to establish an annual Power ON budget of \$14.5 million.
- 3) Approve Xcel Energy’s proposal to transfer \$2 million from Power ON to low-income discount recipients if, after operating for two full federal fiscal years at \$14.5 million per year, the Power ON tracker balance exceeds \$5 million.

Respectfully submitted,

November 15, 2023

/s/ Pam Marshall  
Interim Executive Director  
Energy CENTS Coalition

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<sup>20</sup> *Id.* at 7.

Northern States Power Company (Minnesota)  
 Electric Utility - State of Minnesota  
 2023 Low Income Discount Program Tracker

ATTACHMENT A

	31-Dec-22	2023					2023 Total
		31-Aug-23	30-Sep-23	31-Oct-23	30-Nov-23	31-Dec-23	
<b>2023 Power On Program</b>							
A Total Billed		\$ (318,289.22)	\$ (284,264.31)	\$ (312,287.57)	\$ -	\$ -	\$ (2,950,936.29)
B Total Disbursed		\$ 1,570,995.95	\$ 1,409,171.73	\$ 1,505,548.33	\$ -	\$ -	\$ 11,100,901.33
C Admin Prog Costs		\$ 2,276.51	\$ 29.48	\$ 51.39			\$ 46,170.04
A+B+C = month's (addition)/reduction to liability balance		\$ 1,254,983.24	\$ 1,124,936.90	\$ 1,193,312.15	\$ -	\$ -	
D Monthly Interest		250,775.00	252,750.00	271,368.00	0.00	0.00	2,201,556.00
Tracker Balance Asset/(Liability)		35,615,541.07	36,993,227.97	38,457,908.12	38,457,908.12	38,457,908.12	38,457,908.12
Balance in SAP Account 2078001 ref 3 "POWER ON" (After Transfer)		-	-	-	-	-	
<b>2023 Low Income Discount Program</b>							
A Total Billed		\$ (912,565.57)	\$ (816,308.26)	\$ (895,229.99)	\$ -	\$ -	\$ (8,470,525.59)
B Total Disbursed		\$ 591,193.00	\$ 400,161.00	\$ 229,851.50	\$ -	\$ -	\$ 4,991,736.13
C Admin Prog Costs		\$ 18,638.18	\$ 21,533.91	\$ 19,638.27			\$ 160,768.88
A+B+C = month's (addition)/reduction to liability balance		\$ (302,734.39)	\$ (394,613.35)	\$ (645,740.22)	\$ -	\$ -	
D Monthly Interest		(262,357.00)	(258,162.00)	(272,387.00)	0.00	0.00	(2,392,342.00)
Tracker Balance Asset/(Liability)		(36,755,334.25)	(37,408,109.60)	(38,326,236.8)	(38,326,236.82)	(38,326,236.82)	(38,326,236.82)
Balance in SAP Account 2078001 ref 3 "E LID" (After Transfer)		(1,139,793.18)	(414,881.63)	131,671.30	131,671.30	131,671.30	



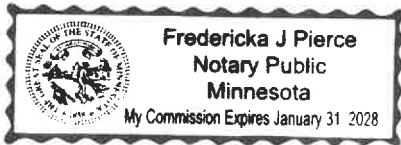
**AFFIDAVIT OF SERVICE**

Pam Marshall certifies that on the 15<sup>th</sup> day of November 2023, she served, by electronic filing, Energy CENTS Coalition's Reply Comments in the Matter of a Petition for Approval of Low-Income Energy Discount Rider Funding, PUC Docket Number(s) E-002/M-04-1956; E-002/M-10-854, to the individuals on the attached service list.

*Pam Marshall*

Pam Marshall

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*F. Pierce*

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Fredericka Pierce

Subscribed and sworn to before me  
this 15<sup>th</sup> day of November 2023

Notary Public

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_10-854_Official
Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360  St. Paul, MN 55101	Electronic Service	No	OFF_SL_10-854_Official
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	No	OFF_SL_4-1956_Official
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