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**To:** [Staff, CAO \(PUC\)](#)  
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Name *	Jill Jacoby
Address	<input type="checkbox"/> 4019 18th Ave S Minneapolis, MN 55407 United States
Phone Number	(414) 708-8191
Email	<a href="mailto:jilljacob@hotmail.com">jilljacob@hotmail.com</a>
Provide the docket's number.	Docket No. E002/M-23-524

Leave a comment on the docket. \*

I am a landlord and property owner in Minneapolis, living in and renting a side-by-side duplex. I've experienced vacancies and difficulties in renting following the pandemic, which has resulted in the electricity service at my rental property being placed in my name. When the electrical service was placed in my name, I was enrolled by default, in the TOU (time of use) rate for this property. My place of residence (the other side of the duplex) is in another rate class, simply labeled "Residential". I recently reviewed the electricity usage for the rental property and was shocked to find an billing anomaly based on usage during the months of July and August (2 months ago) that resulted in a bill twice that was 16 times the previous month, twice as much as the subsequent month, and twice as much the same month when it was similarly occupied two years prior. The root cause was in large part to the TOU program, and the Summer On-Peak and Mid-Peak rates, which I was completely unaware were in effect on this property. Coupled with a one-time estimated reading (one time in the entire year), the result was an exorbitant charge for A/C usage that could have been mitigated by educating my mid-term renters about more appropriate usage during some of the hottest Minnesota days. During this period, my own residence, under the "Residential" rate did not experience such an odd billing spike.

While charging more during peak rates may be a solid economic principle, this type of policy should be "opt in" rather than opt out and requires widespread consumer education. Opt-in provides some acknowledgement of understanding. The TOU program will negatively impact those that would be most tragically impacted by an unexpected energy bill, and those that have more pressing concerns (survival) on their minds, rather than thinking about their energy consumption. It would also impact the elderly and stay-at-home caregivers that need consistent energy usage (A/C and heat) during peak hours.