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June 20, 2024

—Via Electronic Filing—

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

RE: PETITION – RECRUITMENT MODIFICATION
GENERAL TIME OF USE SERVICE PILOT PROGRAM
DOCKET NO. E002/M-20-86

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Petition for approval of the recruitment plan in use for our General Time-of-use (TOU) Service Pilot Program. The Company is requesting a modification to the recruitment plan in an effort to attract more pilot participants.

Attached to this cover letter, we provide the required information as specified in Minn. Rule 7829.1300 and Minn. Rule 7829.0700, including to whom information requests should be directed.

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 Brandon Kirschner at Brandon.M.Kirschner@xcelenergy.com or me at Holly.R.Hinman@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

HOLLY HINMAN
DIRECTOR, REGULATORY & STRATEGIC ANALYSIS

Enclosures
cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Valerie Means	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF THE PETITION –
RECRUITMENT MODIFICATION

DOCKET NO. E002/M-20-86

PETITION

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy (Company), submits to the Minnesota Public Utilities Commission (Commission) this Petition for approval to change the recruitment plan in use for our General Time-of-use (TOU) Service Pilot Program. The Company is requesting a modification to the recruitment plan in an effort to attract more pilot participants. The Company's current recruitment efforts have not generated meaningful participation in the pilot, which threatens the Company's ability to generate helpful learnings. The modification requested here seeks to broaden participation and provide better data for the Company and the Commission.

The initial recruitment plan was designed to limit self-selection bias for an opt-in pilot. Since launching the outreach effort, customer interest in the pilot has been low. The Company believes that eliminating the original restrictions on recruitment will allow us to engage with all potential participants on a broader scale and may enable an increase in pilot participation which is necessary to generate learnings about these new rate designs. The Company respectfully requests that the Commission approve a modified approach to recruiting for the pilot to offer a less restrictive opportunity for customers to opt into the rate of their choosing.

PETITION

I. Background

The Company was directed to implement the General TOU Service Pilot Program in July 2021.¹ The Commission later approved additional features of the pilot, including its tariff, in February 2023.² Order Point 11 of the Commission's February 2023 Order approved the Company's recruitment plan.

The approved pilot features two rate designs for inclusion in the study, a General TOU rate and a Critical Peak Pricing (CPP) rate, with eligible customers being able to opt-in to one of the rates. With an opt-in pilot there is concern that customers who would most benefit from the rates, also known as "structural winners", would opt-in to the rate most beneficial to them, generating a risk of self-selection bias and skewing results. With a study comprised of only structural winners, it is less clear that results of the pilot would be applicable to a wider population if the rates are expanded to a larger number of commercial and industrial customers. To combat the possibility of self-selection bias and approximate some randomization, the Company proposed a recruitment plan that would limit the marketing of the rate options.

The original recruitment plan involved randomization of the population into three recruitment groups. 40 percent of the eligible population would be randomly assigned to a General TOU rate group, where they were marketed only that rate. An additional 40 percent of the eligible population would be randomly assigned to a CPP rate where they were only marketed that rate. The remaining 20 percent would be assigned to a customer choice group, where both rate options were marketed to customers to choose from. The customer choice group provided the additional opportunity to study customer preference when presented both rates. These customer groups simply reflected the Company's marketing efforts. They did not limit customers' ability to participate in either rate option. In other words, customers were still able to enroll in either rate option, even if they were not initially marketed one, both, or even any of the rate options. In this way, the Company's proposal does not change the rate options that are available to customers in the pilot, it simply changes our marketing efforts to achieve greater participation.

The Company has made diligent efforts to recruit participants into this pilot using the groups outlined above. Despite these efforts, customer uptake has not been at the

¹ See ORDER TO CONDUCT PILOT PROGRAMS FOR GENERAL SERVICE TIME-OF-USE RATES, AND SETTING PROCEDURAL SCHEDULE (July 16, 2021), Docket No. E002/M-20-86.

² See ORDER APPROVING TIME OF USE PILOT AND SETTING ADDITIONAL REQUIREMENTS (February 1, 2023), Docket No. E002/M-20-86.

level needed for the Company to receive meaningful learnings. The Company began recruitment for the pilot via email and postcards sent to customers based on their recruitment group. A postcard was initially mailed to customers in early Q3 of 2023. This mailing was sent to 1,232 customers, broken down as 493 CPP customers, 491 TOU customers, and 248 customers with a choice of rates. A second outreach to customers was done via email on August 16, 2023. This communication was sent based on the same participant list as the direct mail outreach. Due to some customers not sharing an email or opting out of email communications, a total of 1,172 emails were sent.

A third round of outreach was completed in December of 2023. This went to recipients of the first email as well as additional eligible customers that had not yet been contacted. In total, 2,974 customers were contacted.

In addition to direct mail and email outreach, the Company's account managers have directly engaged customers to discuss these rates. In general, they have found limited interest from customers.

These efforts to recruit customers into the pilot have had limited success. The Company has four customers who are in the process of enrolling to participate in the pilot under the General TOU rate. There has yet to be any customers interested in participating under the CPP rate.

II. Proposed Recruitment Strategy Change

To bolster participation in the pilot to receive more broad-based data, the Company proposes to modify the strategy to recruit customers for the pilot. Specifically, the Company proposes to discontinue the randomized assignments that were used to group eligible customers into three groups. Instead of the randomized group, the Company will market both pilot rate options to all eligible customers. We believe that this shift will allow us to attract more customers as all customers would receive greater information about both rate options and will be able to decide whether either rate is right for them.

In conjunction with the change in recruitment strategy, the Company plans to continue its outreach efforts to customers. Specifically, the Company will complete an additional round of communications, through both email and direct mail. The Company will also add both pilot rates to the Company's 'Rate Plans' page of its website. This was not done previously because the Company did not want to undermine its efforts to market the different rates to their respective groups. But with those restrictions removed the website content can be made available to all customers,

which will provide easier access to information about these rate options. Removing recruitment barriers will also allow for information on both pilot rates to be shared with all eligible customers at the time of installation of a new interval meter. Finally, the Company is also considering setting up webinars with customers to provide information about the pilot and to directly answer questions from customers. The Company anticipates completing these additional marketing and communication efforts within existing budgets.

III. Support for the Change

The Company was intentional about its original study design, which was developed with outside consultant, Opinion Dynamics. Opinion Dynamics has expertise providing implementation guidance (also known as developmental evaluation) and will also evaluate the outcomes of the pilot as it progresses.

Opinion Dynamics provided the Company with a Memorandum discussing strategies to address the low customer interest in the pilot. The Memorandum provides background on the issue of structural winners, which is one of the risks inherent with an opt-in rate. As described in the Memorandum, having many self-selected structural winners participate in the pilot can lessen the applicability of pilot results when applied to the general customer population. This must be balanced, however, against the fact that the Company's low participation to date will also lessen the applicability of pilot results.

Considering the concern about structural winners in comparison to the risk of low pilot participation, Opinion Dynamics offered two conclusions which support our proposal in this Petition. The first conclusion is that "the risk of low participation in the Pilot poses a more significant threat than the risk of participation of structural winners."³ The second conclusion is that "rather than focusing on avoiding the recruitment of structural winners to the Pilot, Xcel Energy should adopt a recruitment strategy that proactively reaches a large and diverse group of customers."⁴ Specifically, having extremely limited participation in the pilot limits the ability to infer how the rate would perform in the general population even more significantly. Thus, even qualitative findings from a population comprised primarily of structural winners are expected to be more helpful than maintaining the current experimental design that limits the options and resources that may be marketed to eligible customers.

³ See Attachment A, Page 3

⁴ Ibid.

In support of our request, the Company provides the Memorandum from Opinion Dynamics as Attachment A to this Petition.

CONCLUSION

The Company appreciates the Commission's consideration of the proposed change to the recruitment plan in use for our General TOU Service Pilot Program. The Company believes the requested change is needed to generate greater participation in our ongoing pilot.

Dated: June 20, 2024

Northern States Power Company

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben
Hwikwon Ham
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Chair
Commissioner
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Commissioner

IN THE MATTER OF THE PETITION –
RECRUITMENT MODIFICATION

DOCKET NO. E002/M-20-86

PETITION

SUMMARY OF FILING

Please take notice that on June 20, 2024, Northern States Power Company, doing business as Xcel Energy (Company), submitted to the Minnesota Public Utilities Commission (Commission) a Petition for approval of a change to the recruitment plan in use for our General Time-of-use (TOU) Service Pilot Program. The Company is requesting a modified recruitment plan for the pilot in an effort to attract more pilot participants.



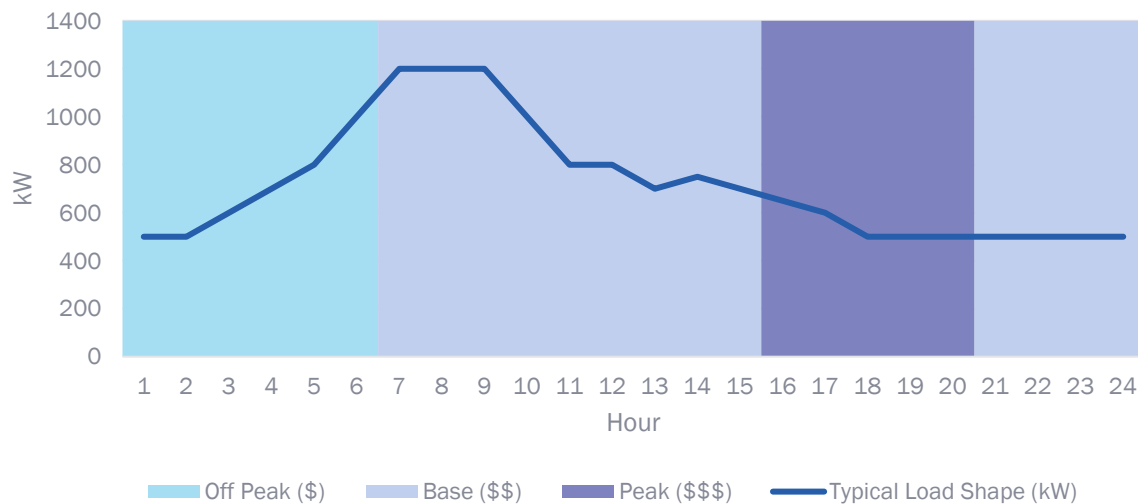
Memorandum

To: Xcel Energy Minnesota CPP TOU Pilot Team
From: Opinion Dynamics Evaluation Team
Date: May 31, 2024
Re: Considerations in Recruiting and Enrolling Structural Winners

Introduction

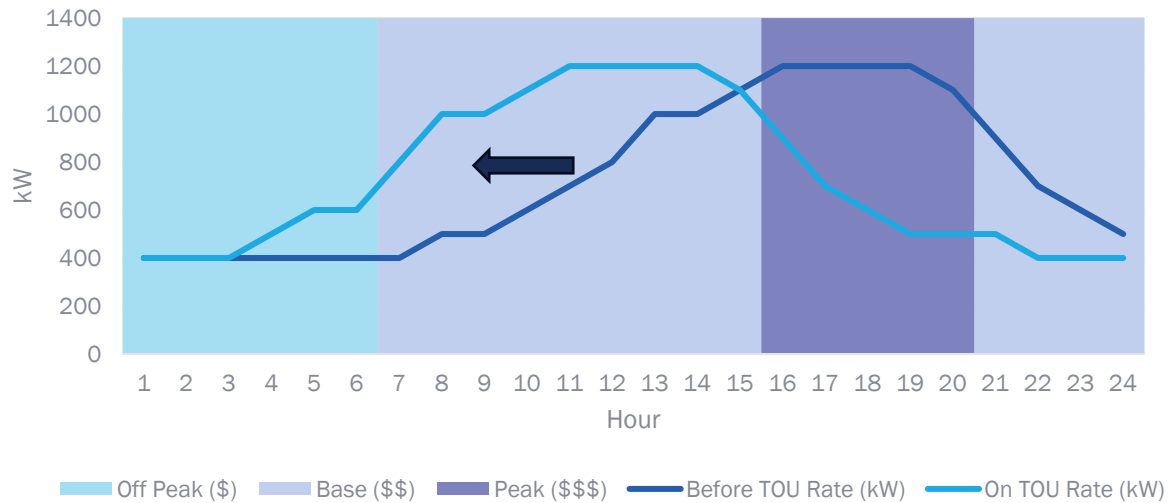
In the context of energy rates and pricing, a structural winner is a customer who would save money on their bill on a given rate **without making any changes to their energy consumption patterns**. An example is a commercial customer whose energy-intensive operations occur during the off peak or base period. By switching to a time-varying rate, that customer can benefit from the lower pricing for the energy they would have used anyway, and they do not need to shift any of their usage away from the peak period (Figure 1).

Figure 1. Load Shift - Structural Winner



In contrast, a non-structural winner would need to shift their usage from the peak to the base or off peak period to realize bill savings, resulting in peak demand savings for Xcel Energy (Figure 1).

Figure 2. Load Shift - Non-Structural Winner



Discussion

A common challenge for opt-in pilots is that structural winners are more likely to choose to participate than non-structural winners. The primary risk of having many structural winners enrolled in the CPP/TOU Pilot is that, because customers can save money without changing their operations or behaviors, the Pilot will produce limited peak demand savings.¹ However, while structural winners will experience lower bills without shifting their energy use away from the peak period, this does not automatically mean that they will fail to make additional behavioral changes in response to the pricing signal, as doing so would have financial benefits for them. A residential TOU pricing pilot study in Maryland found that structural winners generated peak reductions similar to non-structural winners in most cases, suggesting these customers may still be responsive to price signals.² Given that commercial customers tend to be more sophisticated than a typical residential customer in terms of controlling their energy use and costs, it is reasonable to hypothesize that commercial customers who are structural winners may still exhibit some responsiveness to the rate.

In addition to the risk to the peak demand savings achieved by the Pilot, a pilot primarily composed of structural winners faces other risks, primarily around how generalizable the learnings of the Pilot will be to the future state when the rate is implemented with a more diverse group of customers. In particular, the Pilot will generate limited findings about the outcomes and experience of non-structural winners on the rate, including the expected peak demand impacts, bill savings, challenges, learnings, and support needed from Xcel Energy to succeed. However, it is essential to note that these shortcomings can only be addressed by recruiting more non-structural winners rather than by avoiding the recruitment of structural winners.

While the Pilot has not included an analysis of the structural winningness status of recruited customers, the customers who have enrolled so far may be those with the resources and capability to determine their structural winningness or likelihood to benefit from the rate. In our previous work for Xcel Energy, we noted that opt-in offerings often bolster enrollment by providing financial-based messaging to customers (e.g., the average customer saves \$X per month) and

¹ This risk is about customers' day-to-day behavior and responsiveness to the peak pricing periods on the TOU and CPP rates. Structural winningness is not generally a concern for the CPP events as they require some customer responsiveness for success.

² Brattle. *PC44 Time of Use Pilots: End-of-Pilot Evaluation*. 2021. (<https://www.brattle.com/wp-content/uploads/2021/12/PC44-Time-of-Use-Pilots-End-of-Pilot-Evaluation.pdf>).

that it is a common practice to provide easily accessible rate comparison tools to customers to aid in their decision-making.³

Conclusions and Recommendations

- The risks of having many structural winners in the CPP/TOU Pilot should be weighed carefully against the risk of achieving very low participation, which would also hinder Xcel Energy's ability to learn from it. Given the very low enrollment in the Pilot to date, **Opinion Dynamics believes the risk of low participation in the Pilot poses a more significant threat than the risk of participation from structural winners.**
- Where possible, we encourage Xcel Energy to provide additional information (e.g., rate comparison tool, estimated savings) and emphasize bill protections to help a more extensive and more diverse set of customers decide to participate in the Pilot. **Rather than focusing on avoiding the recruitment of structural winners to the Pilot, Xcel Energy should adopt a recruitment strategy that proactively reaches a large and diverse group of customers.**

³ Opinion Dynamics. *Evolving the Critical Peak Pricing Rate: Lessons Learned from CPP Rates and CPP Rate Adders*. 2023.

CERTIFICATE OF SERVICE

I, Marie Horner, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

Docket No. E002/M-20-86

Dated this 20th day of June 2024

/s/

Marie Horner
Regulatory Administrator

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