

Staff Briefing Papers

Meeting Date July 31, 2025

Agenda Item **4

Company All Rate-Regulated Gas and Electric Utilities

Docket No. E, G-999/PR-25-2

In the Matter of Utility Cold Weather Rule and Residential Customers Status Data

- Issues**
1. Should the Commission take any action on the residential customer status data reported in Docket No. E, G-999/PR-25-2?
 2. Should utilities be required to develop disconnection and payment arrangement policies and make them public?
 3. Should the Commission take any action on Greater Minnesota Gas' delayed filing of its Cold Weather Rule report?

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✓ Relevant Documents

Date

Docket No. E, G-999/PR-24-2

Xcel Corrected Compliance Filing re: Disconnection Policy

March 3, 2025

CPE Reply Comments re: Change of Disconnection Policy

March 31, 2025

Docket No. E, G-999/PR-25-2

Citizens Utilities Board and Legal Services Advocacy Project Comments

January 31, 2025

Xcel Energy Responses to PUC Staff Information Requests #1-5

February 7, 2025

CenterPoint Energy Comments

February 10, 2025

Great Plains Natural Gas Comments

March 31, 2025

Minnesota Energy Resources Comments

March 31, 2025

Citizens Utility Board and Legal Services Advocacy Project Reply Comments

April 18, 2025

Xcel Energy Reply Comments

May 13, 2025

Office of the Attorney General Reply Comments

May 14, 2025

Otter Tail Power Company Reply Comments

May 14, 2025



✓ **Relevant Documents**

	Date
Minnesota Energy Resources Reply Comments	May 14, 2025
Minnesota Power Reply Comments	May 14, 2025
Greater Minnesota Gas Letter in Lieu of Response to Reply Comments <i>(Date on letter listed as April 25, 2025)</i>	May 14, 2025
CenterPoint Energy Reply Comments	May 14, 2025
Department of Commerce Reply Comments	May 15, 2025
CenterPoint Energy Compliance Filing re: Disconnection Policy	May 28, 2025
Great Plains Natural Gas Supplemental Comments	May 30, 2025
CenterPoint Energy Supplemental Comments	June 11, 2025
Minnesota Power Supplemental Comments	June 20, 2025
Otter Tail Power Company Supplemental Comments	June 23, 2025
Dakota Electric Association Supplemental Comments	June 27, 2025



I. Scope

Staff has limited the scope of the briefing paper to focus on:

- 1) The recommended actions to increase transparency of utility policies related to disconnections, service deposits, and payment agreements.
- 2) The lapse in Greater Minnesota Gas (GMG)'s Cold Weather Rule (CWR) reporting.

Additional issues mentioned in comments but not fully developed in the record or more suitable for another docket will be discussed briefly at the end of this paper.

II. Background

Minnesota Statutes §§ 216B.091¹ and 216B.096² require utilities to regularly report data on residential customers. Reported data includes, among other metrics, the number of customers with past due bills, the average amount past due for those customers, and the number of accounts disconnected for nonpayment. Utilities are required to file two datasets:

1) Weekly

One dataset is reported weekly during Cold Weather Rule (CWR) season (October 1st through April 30th) with the utility's currently disconnected customers.

2) Monthly

A second dataset is reported monthly throughout the entire year. The current monthly reporting template was established through a public process and combines residential customer status data reported during the COVID-19 pandemic in Docket No. E, G-999/CI-20-375, as well as data required under the above-referenced statutes. With the closure of Docket No. E, G-999/CI-20-375, residential customer status data are only reported in Docket No. E, G-999/PR-YR-2.

In addition to regular reporting, the Commission also seeks public comment on the data reported in Docket No. E, G-999/PR-YR-2. At its February 8, 2024 agenda meeting, the Commission reaffirmed its commitment to opening twice-annual comment periods, in March and September. This decision was consistent with the Order in Docket No. E, G-999/CI-20-375.³

As Staff must issue regular notices on this topic, Staff's subsequent September 30, 2024 Notice of Comment Period questions largely repeated questions asked in March 25, 2024 Notice by asking:

- 1) Considering the data filed in docket no. E, G-999/PR-24-2 prior to the issue date of this

¹ [Minn. Stat. § 216B.091 Monthly Reports.](#)

² [Minn. Stat. § 216B.096 Cold Weather Rule; Public Utility.](#)

³ Docket No. E, G-999/CI-20-375 Order Accepting Reports and Requiring Filings, March 8, 2021, Order Point 2f. While the Commission's March 8, 2021 Order delegated authority to the Executive Secretary to establish two comment periods per year (mid-January and mid-August), data had instead been analyzed by Staff and presented to the Commission at annual planning meetings, typically held in late Spring, See the May 10, 2022 and April 27, 2023 Special Planning Meetings.

notice, should any trends in the data be highlighted for the Commission?

- 2) What action, if any, should the Commission require utilities to take to continue exemplary performance or remedy unsatisfactory performance?
- 3) What does an analysis of the data reported in this docket reveal about equitable delivery of utility service?

The September 30, 2024 comment period was extended twice, ultimately closing on January 31, 2025. No comments were received until January 31, 2025 when the Citizens Utility Board (CUB) and the Legal Services Advocacy Project (LSAP) recommended a series of utility actions to increase transparency in utility disconnection, service deposit, and payment arrangement policies as well as recommended topics for discussion in annual Safety, Reliability, and Service Quality (SRSQ) filings and annual affordability reports.

Simultaneously, in Docket No. E-002/M-24-27, the Commission required Xcel Energy (Xcel) to take actions to increase transparency by filing its disconnection and payment agreement policies in Docket No. E, G-999/PR-YR-2, making a filing whenever there are changes to these policies and posting these policies on Xcel's website.⁴

Staff's March 2025 Notice of Comment on CWR reports cited the actions required in Xcel's SRSQ proceeding in Docket No. E-002/M-24-27 and CUB/LSAP's January 31, 2025 recommendations. The Notice prompted a utility response to CUB/LSAP's recommendations, then a stakeholder response to utilities, and finally, a utility response. By the close of the comment period on May 14, 2025, responses to questions posed in Staff's Notice of Comment were received from CenterPoint Energy (CPE), Great Plains (GP), Minnesota Energy Resources (MERC), Xcel, Otter Tail Power (OTP), and Minnesota Power (MP). Greater Minnesota Gas (GMG) filed comments on a different matter.

As some utility responses were perceived as incomplete, the Department recommended the Commission require additional responses from Dakota Electric Association (DEA), GMG, and OTP. The Department also suggested supplemental comments be filed to gather additional data; in response, GP, CPE, OTP, and MP all filed supplemental comments after the close of the comment period.⁵

Table 1: Responses to Notice of Comment

Utilities Responding	Utilities Not Responding	Stakeholders Responding
CenterPoint Energy (CPE)	Dakota Electric Assoc. (DEA)	CUB & LSAP
Great Plains (GP)	Dooleys Natural Gas*	Department of Commerce (Department)

⁴ See the [Commission's Order](#) in Docket Nos. 24-27, 24-29, and 24-30, Order Points 22 and 23. Xcel Energy made a compliance filing on January 31, 2025 and an addition to that filing on March 3, 2025.

⁵ 25-2 Department comments, May 15, 2025. As shown in Table 1, OTP responded with comments filed May 14, 2025. Then, supplemental data focused on non-English speakers (CPE, GP, OTP, and MP) and heat-affected customers (CPE, GP, OTP, and MP who referenced where data can be found in its SRSQ proceedings) were filed.



Minnesota Energy Resources (MERC)	Northwestern Wisconsin Electric Company*	Office of the Attorney General, Residential Utilities Division (OAG)
Minnesota Power (MP)	Greater MN Gas (GMG)**	
Otter Tail Power (OTP)		
Xcel		

*These utilities file reports in YR-2 but are considered small utilities under Minn. Stat. § 216B.16, subds. 12 and 12a and are normally subject to significantly reduced filing requirements.

**GMG did, however, file two letters addressing the lapse in its CWR reporting and submit the missing reports.

III. Discussion

As stated above, this briefing paper will be divided into three topics:

1. *CUB/LSAP recommendations.*
2. *GMG's lapse in required Cold Weather Rule Reporting.*
3. *Topics that will be discussed at a later time or in another docket as either the record was not developed or the topic is more suitable, as suggested by parties or Staff, for another docket.*

Staff begins this discussion with CUB/LSAP's recommendations for increased transparency in disconnection, downpayment and deposit, and payment arrangement policy and practice. This briefing paper organizes recommendations in sections A-D; Staff summarizes the recommendations here:

- A. Immediate compliance filing on policies and practices
- B. Notification of any changes to policy or practice
- C. Explanation of down payment and deposit practices
- D. Post policies and practices on utility website using CUB/LSAP language

CUB/LSAP's comments explained the context prompting their recommendations:⁶

- Higher levels of residential customer arrearages post-COVID-19 Pandemic compared to 2015-2019.
- Increasing number of residential customer disconnections following the return to normal operations,⁷ especially during winter months and especially by Xcel.
- Recent studies showing the higher rate of disconnection for people of color, even when controlling for other demographic information.

⁶ 24-2 CUB/LSAP comments, January 31, 2025.

⁷ Docket Nos. E, G-999/CI-20-375 and E, G-999/PR-23-2 Order Establishing Procedural Requirements, March 6, 2024.

Further, CUB/LSAP justified their recommendations stating that disconnection and arrearage policies are often non-standard across utilities and non-public. Further, while utilities are required to share, per the Residential Customer Status Reporting template, data like number of customers or presence/absence data, these quantitative data are not being explained by qualitative data on the policies and practices driving measured outcomes.

A. Immediate Compliance Filing on Policies and Practices

Calling for transparency in utility policy, CUB/LSAP's first recommendation included each utility making a compliance filing on its policies and practices for disconnections, service deposits, and payment agreements (**Decision Option 1**). Xcel was already required to file this information, as mentioned above, and CUB/LSAP requested CPE file the same information.⁸

Utility Responses

CPE made such a filing on March 28, 2025, in accordance with the Commission's Order.⁹ GP, MERC, and OTP responded that they would submit such a filing if ordered to do so.¹⁰ MP explained that, in 2019, it created a similar document, detailing its payment agreements, disconnection, reconnection, and Cold Weather Rule and related service practices for residential customers.¹¹ However, MP stated it "is amenable to providing an abbreviated summary similar to that provided by Xcel Energy under Docket Nos. E-002/M-24-27," as it found Xcel's document to be customer-friendly and comprehensible (**Decision Option 2**). DEA stated that as part of the Settlement Agreement in its pending general rate case (Docket No. 24-400), the Cooperative already agreed to work with interested parties on modifications to its disconnection policies, so the Cooperative does not believe that further modifications are needed at this time.¹² However, it is willing to submit a compliance filing detailing its disconnection policies and practices.

Staff Analysis

Staff supports all rate-regulated utilities (MP, OTP, GMG, GP, MERC, and DEA) creating and sharing a publicly available and understandable policy and practice summary document. Table 2 below, summarizes the policy and practice summary documents recently filed by Xcel and CPE.

⁸ CUB/LSAP provided citation, See In the Matter of the Consumer Appeal of Consumer Complaint 82340, Docket No. G-008/C-24-191, Initial Comments of the Citizens Utility Board of Minnesota and the Legal Services Advocacy Project at 7-8 (Dec. 23, 2024). Xcel's requirement was set in in docket no. E-002/M-24-27 with the most recent version filed March 3, 2025 in docket no. 24-2. CPE complied on March 28, 2025 filing in docket no. 25-2.

⁹ Order Resolving Consumer Appeal, Requiring Separate Billing for Regulated and Unregulated Business, and Requiring Further Action issued April 29, 2025 in Docket no. G-008/C-24-191 at paragraph 13.

¹⁰ Great Plains reply comments filed March 31, 2025 in docket no. E,G-999/PR-25-2. OTP comments filed May 14, 2025 in docket no. E,G-999/PR-25-2. MERC replies filed 14 May 2025 in docket no. E,G-999/PR-25-2.

¹¹ MP reply comments 14 May 2025 in docket no. E,G-999/PR-25-2 with original document filed in Docket No. E-015/M-18-250 on October 8, 2019.

¹² DEA initial comments, June 27, 2025, p. 5.

To create understandable documents, the Commission may choose to direct utilities to work with the Commission's Consumer Affairs Office (CAO) (**Decision Option 7**). The CAO has long been involved in creating accessible communication for utility customers. For example, the CAO has had ongoing discussions with Xcel's regulatory and legal teams advocating for the Company to provide clear policies and training to their customer agents in order to facilitate affordable payment plans and prevent customer defaults. For the information being discussed in the instant docket, Table 2 shows that value could be gained by working with CAO. Table 2 shows that despite filing, and thus making public, such documents, the documents may not be understandable. For example, the grade level is well-above the targeted 8th grade reading level the CAO recommends for use in mass-customer communication.

Table 2: Recently Required Utility Filings on Disconnection etc. Policies and Practices

<i>Content</i>	<i>Xcel¹³</i>	<i>CPE¹⁴</i>
<i>Length</i>	2 pages; 549 words	3 pages; 1,272 words
<i>Word's Flesch-Kincaid Grade Level</i>	12.6	13.4
<i>Time from Notice to Disconnection</i>	10 days	10 days; 15 days in CWR
<i>Payment Thresholds</i>	Notice sent @ \$180 Disconnected @ \$300	Notice sent @ \$75 Disconnected @ \$175
<i>Customer Communication</i>	Electronic-only	Phone call, text, email
<i>Payment Arrangements</i>	Two types explained	Extensions, more time to pay. Installments, 3 types explained.
<i>Down Payments</i>	Two types, normal and extenuating circumstance explained with % down for each shown	-
<i>Cold Weather Rule (CWR)</i>	-	Explained staff "scripting" to set up payment plans for active and disconnected customers.
<i>Medical Emergency Provision</i>	-	Explained
<i>Customer Appeal During CWR</i>	-	Explained
<i>Billing</i>	-	Explained billing cycle, how payments may be

¹³ Order Accepting Reports and Setting Additional Requirements issued January 13, 2025 in docket no. E-002/M-24-27 at paragraph 23, "Xcel must make a filing in the instant docket and Docket E,G-999/PR-24-02 detailing its current disconnection policies and practices, and require Xcel to submit additional filings in Docket E,G-999/PR-02 when there are changes to those policies and practices within 20 days of the Order." Xcel complied by filing on January 31, 2025 and again on March 3, 2025.

¹⁴ Order Resolving Consumer Appeal, Requiring Separate Billing for Regulated and Unregulated Business, and Requiring Further Action issued April 29, 2025 in Docket no. G-008/C-24-191 at paragraph 13, "Within 30 days of this order, CenterPoint shall file in Docket No. E,G-999/PR-YR-02 its disconnection, payment agreement, and billing practices, subject to any changes approved by the Commission." and 14. "CenterPoint shall submit a compliance filing in Docket No. E,G-999/PR-YR-02 whenever it modifies its disconnection, payment agreement, or billing practices." CPE made the required filing on March 28, 2025.



		made, late & returned payment charges, and optional services like Average Monthly Billing.
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Moving from general comprehension, Table 2 also shows that between utilities, they do not have the same disconnection practices. Differences may be based on key utility or service territory characteristics. If not, the Commission may be interested in some degree of standardization to simplify work for CAO staff and to create a baseline of service for Minnesota utility customers.

With respect to one utility practice in particular, Staff points to CPE's lower payment threshold. Staff notes that during the transition period back to normal service following the COVID-19 pandemic moratorium on disconnections, the Commission required CPE to increase its disconnection threshold.

CenterPoint Energy must maintain the service disconnection threshold of \$500 for August 2021, increase the service disconnection threshold to \$350 in September 2021, and increase the service disconnection threshold to \$200 for the months October 2021 through the duration of the transition period (April 30, 2022).¹⁵

B. Notification of Any Changes to Policy or Practice

In further service of transparency, CUB/LSAP also recommended each utility make a filing in the YR-2 docket whenever there are changes to their disconnection, service deposit, and payment agreement policies and practices (**Decision Option 3**). In response, MERC said it would make such a filing to the Commission if changes to policy or practice were made.¹⁶ CPE and Xcel were previously required to make filings detailing any changes to policy.¹⁷ Per this requirement, CPE offered its own language for making a compliance filing and updates.

At present, Staff is unaware of any formal filing on changes to disconnection policy that do not come at the requirement of Commission Order in specific dockets. Any changes that the utility elects to implement would almost certainly need to be filed as a tariff change, subject to notice and comment and Commission approval. However, it may be helpful context to have those

¹⁵ Order Adopting Broad Transition Plan Proposal, Suspending Negative Reporting, and Establishing Notice and Communication Requirements issued May 26, 2021 in docket no. E, G-999/CI-20-375 at paragraph 11. It is unclear to Staff why the amount was reduced to the \$175 shown in Table 2.

¹⁶ MERC replies filed 14 May 2025 in docket no. E,G-999/PR-25-2.

¹⁷ Order Resolving Consumer Appeal, Requiring Separate Billing for Regulated and Unregulated Business, and Requiring Further Action issued April 29, 2025 in Docket no. G-008/C-24-191 at paragraph 13, "Within 30 days of this order, CenterPoint shall file in Docket No. E,G-999/PR-YR-02 its disconnection, payment agreement, and billing practices, subject to any changes approved by the Commission." and 14. "CenterPoint shall submit a compliance filing in Docket No. E,G-999/PR-YR-02 whenever it modifies its disconnection, payment agreement, or billing practices." Order Accepting Reports and Setting Additional Requirements issued January 13, 2025 in docket no. E-002/M-24-27 at paragraph 23, "Xcel must make a filing in the instant docket and Docket E,G-999/PR-24-02 detailing its current disconnection policies and practices, and require Xcel to submit additional filings in Docket E,G-999/PRYR-02 when there are changes to those policies and practices within 20 days of the Order."

changes referenced in this docket as a way of interpreting the data. Therefore, Staff supports making an update to policy in the form of a compliance filing in the most current YR-2 docket (**Decision Option 3**).

C. Explanation of Down Payment and Deposit Practices

Lastly, in service of transparency, CUB/LSAP recommended that each utility requiring down payments or service deposits also include an explanation of how payment amounts are determined. CUB/LSAP voiced concern that:

Nothing in Minn. Stat. §§ 216B.096 or 216B.098 requires down payments as a condition of customers exercising their right to a payment arrangement. Prohibitive demands prior to the reconnection or continuation of service raise serious questions about whether utility policies undermine customers' statutory rights to payment agreements and just and reasonable utility service.¹⁸

Utility and Department Responses

CUB/LSAP stated that, "Although the report already requests this explanation [re: down payments or service deposits], utilities have not always provided such data."¹⁹ Thus, CUB/LSAP requested utilities must start to, as required, explain their practices (**Decision Option 4**).

CUB/LSAP as well as the Department also suggested *additional* data for utilities to report. CUB/LSAP recommended utilities report:

- Average down-payment amount received from customers during CWR and non-CWR months, after the negotiation process, as:
 - A percentage of arrears, and
 - A total dollar value.²⁰
- How the utility implemented the statutorily required consideration of both financial and extenuating circumstances for payment agreements during CWR and non-CWR months.

Commenters disagreed if additional information should be required and where such information would be shared.

Concerning where such policies and practices would be explained, commenters disagreed on the YR-2 filings (**Decision Options 9a-b**) versus the annual SRSQ reports (**Decision Options 10a-b**). In favor of CWR reports, MERC recommended reporting payment plan information in the YR-2 docket.²¹ CUB/LSAP modified its recommendation based on MERC's suggestion and now supports reporting in YR-2 docket. DEA said that it only files an informational SRSQ report and therefore, would prefer any additional data to be reported in the YR-2 dockets. That being said,

¹⁸ CUB/LSAP comments filed January 31, 2025 in Docket No. E,G-999/PR-24-2 at 6.

¹⁹ CUB/LSAP reply comments filed April 18, 2025 in Docket No. E,G-999/PR-25-2 at 8.

²⁰ MERC March 31, 2025 in docket no. E,G-999/PR-25-2. MERC suggested the information be added to the Residential Customer Status Report monthly reporting template, on Tab 5.

²¹ MERC March 31, 2025 in docket no. E,G-999/PR-25-2.

the Cooperative does not support reporting additional data.²²

Conversely, MP replied that any additional information on downpayments, disconnections, etc. belongs in SRSQ as the template used in YR-2 was developed after a long stakeholder process, and as such, need not be further modified.²³

The Department recommended the Commission take no action on the Residential Customer Status Data reporting in Docket No. E, G999/PR-25-02 currently (**Decision Option 22**). DEA supports the Department's recommendation, saying that the Cold Weather Rule reporting was recently revised through an extensive process with utilities and interested parties.²⁴ More, the Department spoke broadly on reporting, suggesting that more data should be provided only if a utility has shown concerning trends in its number of residential disconnections. The Department's analysis showed that only MP and OTP saw increases in the number and percent of disconnected customers when comparing the start and end of the 2024-25 CWR season.²⁵ Thus, the Department suggested extending CUB/LSAP's first recommendation, a document sharing disconnection practices (**Decision Option 1**), only to utilities that may not be adequately protecting customers. As the Department explained, the reporting requirements for Xcel and CPE were derived in other dockets and thus:

...in seeking to extend a sub-set of the recommendations from the 24-27 docket to the remaining six regulated utilities in the absence of any information that suggest those utilities' disconnection and reconnection policies or payment arrangements are inadequate from a ratepayer perspective seem overly broad. The Department agrees in concept with CUB/LSAP's premise that regulated utilities should follow reasonable policies and protocols related to these issues. The Department is not comfortable extending recommendations developed and agreed to in one docket, with one specific set of circumstances to the remaining regulated utilities.²⁶

Rather than supporting CUB/LSAP's first recommendation (**Decision Option 1**), the Department recommended further record development by Xcel and CPE providing one year of data to show the effects of recently approved policies on:

- 1) Service disconnections,
- 2) Payment arrangements,
- 3) Various customer protections and assistance, and
- 4) The effects of those changes on Company bad debt expense (**Decision Option 11**).

Then, for other regulated utilities, the Department recommended a compliance filing addressing "whether the state's other regulated utilities administer their service disconnection and complaint resolution protocols efficiently and equitably" (**Decision Option 12** discusses

²² DEA initial comments, June 27, 2025, p. 10.

²³ MP reply comments 14 May 2025 in docket no. E,G-999/PR-25-2.

²⁴ DEA initial comments, June 27, 2025, p. 5.

²⁵ Department comments May 14, 2025 in docket no. E,G999/PR-25-2 at 4-5.

²⁶ Department comments May 14, 2025 in docket no. E,G999/PR-25-2 quoted text at 5.

complaints).²⁷ In a late filed document, Minnesota Power said it took “no strong stance” on the Department’s position but was “supportive of the rationale” regarding further record development.²⁸

Staff Analysis

Regarding the additional reporting recommended by CUB/LSAP, Staff notes that down payments (or service deposits) are included in the reporting template for Docket No. YR-2 includes: a) the number of customers with current payment arrangements; b) the average payment arrangement amount requested; and c) the average duration of payment arrangements. The template also prompts utilities to explain the practice if: a) service deposits and/or reconnection fees are charged to restore service; b) down payments are required for payment arrangements; and c) interest, penalties, or fees or charged.²⁹ Staff expects that such data would be provided where it was intended, in the E, G-999/PR-YR-2 docket.

After consulting with the Commission’s CAO, Staff is not convinced of the value of such information. Information that could be of value would be deposit or downpayment amount as a percent of a customer’s income. However, such reporting was not suggested in the record and thus was not commented on by any stakeholders. If the Commission is interested, Staff could include a question on this topic in the September 2025 Notice of Comment (**Decision Option 21A**).

Though the Department questioned the need for utility summaries of their policies and practices for disconnections, service deposits, and payment agreements, as discussed in a previous section, Staff remains supportive of filing such information. As a reminder, Xcel and CPE have already filed this information; DEA, GP, MERC, and OTP said they would file information if Ordered; MP would revise a previous report to be more publicly accessible; GMG did not comment.

With respect to the Department’s recommendation for additional data collection, Staff understands how reporting of additional data by Xcel and CPE could complement the call for increased public access to qualitative information on utility policies and practices. The data the Department has called for could show the impacts of the policies for which CUB/LSAP wants more explanation.

However, current reporting appears to Staff to *already* provide the information the Department is seeking. The Department may wish to clarify this recommendation during the Commission’s upcoming agenda meeting. At present, Staff is unclear about the need to provide, in a separate filing, the same monthly, qualitative data *already* filed in Residential Customer Status Report. The list below uses the same letters, a-d, used to describe the Department’s recommendation

²⁷ Department comments May 14, 2025 in docket no. E,G999/PR-25-2 quoted text at 6.

²⁸ Minnesota Power supplemental comments filed June 19, 2025 in docket no. E,G999/PR-25-2 at 3

²⁹ Order Adopting Broad Transition Plan Proposal, Suspending Negative Reporting, and Establishing Notice and Communication Requirements issued May 26, 2021 in docket no. E, G-999/CI-20-375 at para. 1b. Then, Notice of Final Reporting Template and Process filed on May 4, 2022 in docket no. E,G999/CI-20-375 and docket no. E,G999/PR-22-2.

above, to show the overlap between that recommendation and the data already reported:

- a) The number of customers receiving disconnection notices and customers ultimately disconnected,
- b) The number of customers restored to service by entering a payment plan,
- c) The number of LIHEAP customers, customers seeking CWR protection, mutually agreed upon payment plans, and emergency medical account status requests granted, and
- d) Total residential write-offs due to uncollectible (bad debt).

Regarding the Department's recommendation for other rate-regulated utilities, filing information on service disconnection appears to support CUB/LSAP's recommendation (**Decision Option 1**). Providing complaint resolution efforts appears to be outside the scope of this discussion but could be added to a subsequent Notice of Comment (**Decision Option 13**).

Finally, Staff suggests that any reporting remain in the PR-YR-2 docket (**Decision Option 9a-b**), rather than moving reporting on down payments and deposits to SRSQ. More, Staff supports utilities filing the totality of information that has been required, including a qualitative explanation of downpayment and deposit practices. Staff does note that some utilities ceased collection of deposits during (OTP) or down payments prior to (MP) the COVID-19 Pandemic, and thus such a requirement, at present, would not apply to all utilities.

D. Post Policies and Practices on Utility Website using CUB/LSAP Language

CUB/LSAP's second and third recommendations focused on the public accessibility of each utility's disconnection policy and offered language to make those policies comprehensible to utility customers. CUB/LSAP said they often speak with customers who:

- Have entered into payment agreements they cannot afford,
- Have unaffordable down payments or service deposits thwart a customer's ability to exercise their right to even enter into an agreement, and/or
- Do not understand that payment agreements can be negotiated, or that the Consumer Affairs Office can facilitate those discussions.³⁰

CUB/LSAP explained that making such information easier to find and comprehend would assist consumers in utilizing ratepayer protections to avoid disconnection. CUB/LSAP recommended language on policies to be placed on a utility's website (**Decision Option 5**). CUB/LSAP's recommended language is shown in **Decision Option 6a-b and e**.

Utility and Department Responses

DEA, GP, MP, MERC, and OTP responded that they would post the recommended language on

³⁰ CUB/LSAP comments filed January 31, 2025 in Docket No. E,G-999/PR-24-2 staff largely quoting text at 6.

their websites if ordered to do so.³¹ More, MP suggested any language be reviewed by CAO, if it had not been already (**Decision Option 7**).

With respect to CUB/LSAP recommended language for a utility's website, one clause said:

If the payment agreement terms offered are not affordable to you, or if your household is facing financial or extenuating circumstances, you should contact a(n) [UTILITY NAME] customer account representative at [PHONE NUMBER and/or EMAIL ADDRESS]. (**Decision Option 6b**)

In Docket No. 24-191, CPE was required to put together a filing of its disconnection payment agreement and billing practices.³² CPE disagreed with CUB/LSAP's language and offered alternatives to inform all customers of their option to pursue a payment plan. CPE recommended the following alternative language:

If the current bill or payment agreement terms offered are not affordable to you, or if your household is facing financial or extenuating circumstances, you should contact a CenterPoint Energy customer account representative at 800-245-2377 [and/or the Company could also provide a link for the "contact us" form].³³ (**Decision Option 6d**)

The Department recommended the Commission extend CUB/LSAP's **Decision Option 6b** recommendation only if an analysis of each utility's disconnection and payment arrangement policies and practices demonstrate that it has not managed its disconnection and complaint processes competently.

Staff Analysis

In consultation with the CAO, Staff learned that customers are less likely to check a utility website when in crisis. Thus, the CAO recommend also putting language on bills, disconnection notices, and other physical means of customer communication (**Decision Option 8**). The CAO notes available space on printed bills and door tags, etc. may necessitate shortened language; also, digital bills may become crowded with information and require thoughtful prioritization of where to place customer messages. The Commission's CAO supports CUB/LSAP's recommended language but, and as mentioned above, suggested utilities be required to work with the CAO on future language (**Decision Option 7**). The CAO would be an asset to help plan for these considerations.

With respect to choosing between the language offered by CUB/LSAP (**Decision Option 6b**) versus the language offered by CPE (**Decision Option 6c-d**), Staff sees the main difference to be, as explained by CPE, a focus on all customers versus just those who have entered a payment plan. The Commission may wish to consider **Decision Option 6d**, because it offers help to both

³¹ Great Plains reply comments filed March 31, 2025 in docket no. E,G-999/PR-25-2. OTP comments filed May 14, 2025 in docket no. E,G-999/PR-25-2. MP replies on 14 May 2025 in docket no. E,G-999/PR-25-2. MERC replies filed 14 May 2025 in docket no. E,G-999/PR-25-2.

³² CPE compliance filing, May, 28, 2025.

³³ CPE reply comments filed May 14, 2025.

customers that are having issues with their monthly bill and their payment agreement terms.

E. Greater Minnesota Gas' Missing CWR Reports

On several occasions, Staff communicated with GMG via email that its required CWR reports had not been filed in Dockets 24-2 and 25-2. On April 25, 2025, GMG explained the delay:

In late 2024, GMG realized that the employee maintaining the report data had not done so correctly, which was not discovered until after that employee's departure. At that time, GMG began rebuilding the data. Complicating these efforts, GMG had changed billing software in 2024, and GMG had to work with its software vendor support personnel to develop tools to extract the necessary data for the reports. GMG then required time to compile and cross-check the data to ensure its accuracy.³⁴

On April 28, 2025, GMG filed:

- Weekly Reports:
 - 2024: January 5, 2024 through May 3, 2024 and October 4, 2024 through December 27, 2024
 - 2025: January 3, 2025 through April 25, 2025
- Monthly Residential Customer Status Report:
 - 2024: January to December
 - 2025: January to March

GMG has returned to filing its CWR reports on time. Aligned with the required filing cadence, GMG then filed its April 2025 residential customer status report on May 20, 2025 and its May 2, 2025 weekly customer status report on May 14, 2025.

CUB/LSAP and the OAG responded to the delayed reporting. The OAG's analysis found:

There is sufficient evidence to find that GMG violated provisions of 216B at least 60 times and that the violations were knowing and intentional. ... Upon finding that GMG knowingly and intentionally violated Chapter 216B, the Commission could refer the matter to the Attorney General to seek monetary penalties."³⁵

Both the OAG and CUB/LSAP support **Decision Option 14**, recommending the Commission, "Find that Greater Minnesota Gas failed to file weekly reports required by Minn. Stat. § 216B.096 forty-six times and failed to file monthly reports required by Minn. Stat. § 216B.091 fourteen times. Refer the matter to the Attorney General to take appropriate legal action."³⁶

³⁴ GMG Letter re: Monthly Residential Customer Status Reports filed in Docket Nos. G022/M-24-02 and G022/M-25-02 on April 25, 2025.

³⁵ OAG supplemental comments, May 14, 2025, Docket No. E,G-999/PR-25-2. Quotations at 5 and 10, respectively

³⁶ OAG supplemental comments, May 14, 2025, Docket No. E,G-999/PR-25-2. CUB/LSAP reply comments filed April 18, 2025 in Docket No. E,G-999/PR-25-2 at 10.

IV. Topics for Another Docket or Time

A. Energy Conservation and Optimization (ECO) Program

CUB/LSAP wants to increase utility customer participation in ECO programs, saying that customers' participation in ECO would serve to lower their utility bills by reducing their energy consumption. Therefore, CUB/LSAP would like utilities to conduct outreach about ECO programs to their customers currently enrolled in affordability programs. CUB/LSAP recommended utilities report on their ECO outreach in their next annual affordability program reports (**Decision Option 15**).³⁷

Utility Responses

MERC, CPE, and MP explained that they already report on ECO elsewhere. Thus, additional reporting would be duplicative. MERC files annual updates in the 2024-2026 Triennial ECO Plan and Status Reports.³⁸ CPE also files in ECO, as well as, as recommended by CUB/LSAP, in its annual compliance filing on the Gas Affordability Program (GAP).³⁹ Last, MP also already reports in ECO but is willing to hold stakeholder groups to revise outreach strategies.⁴⁰ DEA does not have an affordability program, so **Decision Option 15** would not apply to the Cooperative.⁴¹

Staff Analysis

Requiring reporting on customer participation in ECO in annual affordability reports would be duplicative. Utilities file triennial ECO plans and annual ECO reports. If the Commission wishes to require utilities to file ECO information in their annual affordability reports, the Commission may consider requiring utilities to do so in their affordability dockets.

B. Communication with Non-English Speakers and People who Cannot Read

The Department suggested utilities to provide more information on how they work with customers who are non-English speakers and/or cannot read.

The CAO and the PUC's DEI Consultant, ADA Coordinator, Affirmative Action Officer have long been working with staff and utilities to ensure communication efforts are aligned with how customers most effectively receive information, like in their first language or in a print or audio format. Therefore, in the interest of accessible information on policy and practice, Staff's Notice of Comment prompted, "How do utilities currently communicate information on disconnection and payment arrangement policies to non-English language speakers, especially to people that

³⁷ CUB/LSAP reply comments filed April 18, 2025 in docket no. E,G-999/PR-25-2.

³⁸ MERC comments filed March 31, 2025 in docket no. E,G-999/PR-25-2 see ECO Docket No. G011/CIP-23-98

³⁹ CPE comments filed March 31, 2025 in docket no. E,G-999/PR-24-2 stating that ECO filings can be found in ECO in Docket No. G-008/M-19-3671 and GAP filings in Docket No. G-008/M-YR-38.

⁴⁰ MP reply comments 14 May 2025 in docket no. E,G-999/PR-25-2. See ECO in Docket No. E015/M-11-409.

⁴¹ DEA initial comments, June 27, 2025, p. 11.

do not read their native language?”

Utility and Department Responses

Considering a lack of responses to this prompt, the Department requested utilities other than MERC and Xcel provide this information in supplemental comments. The Department would review that information and provide its recommendation in supplemental comments (**Decision Option 16**).⁴² DEA, GP, MP, OTP, and CPE responded to the Department with late filings on their language practices, which typically include offered phone call and website translation options.⁴³

Staff Analysis

The Commission explored the importance of communicating in languages that reflect the customer diversity of utility service territories in docket no. E,G999/CI-20-375, focused on making information on energy assistance programs accessible to all customers.⁴⁴ While this topic is demonstrably important to the Commission, Staff recommends that because many utility responses were received after the formal close of the comment period in this docket and thus not discussed among commenters, if the Commission would like additional information or action, this topic be prompted once again in the September 2025 comment period in the instant docket (**Decision Option 17**). Staff sees the importance of gathering responses from all utilities to compare, and perhaps, suggest a shared level of service. Staff could also picture addressing how utilities can reach non-English speakers and people that do not read their native language through an informal process involving conversations with utilities, stakeholders, and community organizations that serve diverse populations that do not speak English as a first language.

C. Policies and Practices for Heat-Affected Customers

Staff included this question in the Notice of Comment after concern was raised by the CAO that heat-affected customers were listed as non-heat-affected in Xcel’s billing system, and

⁴² Department comments filed May 15, 2025 in docket no. E,G-999/PR-25-2

⁴³ GP supplemental comments filed May 30, 2025 in docket no. E,G-999/PR-25-2 shared that GP’s website can be translated into multiple languages and that customers can access a translation service when calling the company as well as connect to Spanish-speaking customer service agents. CPE’s supplemental comments filed June 11, 2025 in docket no. E,G-999/PR-25-2 shared that all telephone calls can be passed through an interpreter service; all disconnection notices are in 4 languages. MP’s response filed June 19, 2025 in docket no. E,G-999/PR-25-2 explained that most of its customers speak English, based on census data, but MP does offer a language line assistance service for interpretation that was used 691 times, mostly in Spanish, in 2024. MP’s website can also be translated into several languages. OTP’s supplemental comments filed June 23, 2025 said that OTP’s website can be translated and OTP has Spanish-speaking staff to respond to customers. DEA’s initial comments filed June 27, 2025 said that it offers a third-party phone translation service and that its website can be translated in Hmong, Somali, and Spanish.

⁴⁴ Order Adopting Broad Transition Plan Proposal, Suspending Negative Reporting, and Establishing Notice and Communication Requirements issued May 26, 2021 in docket no. E, G-999/CI-20-375 at paragraph 6, “The utilities should provide their Notices translated into other languages predominant in their communities such as Spanish, Somali, or Hmong.”

therefore, at-risk for disconnection during CWR season.

Utility and Department Responses

The Department suggested utilities provide more information on utilities' treatment of heat-affected customers.

MERC, CPE, GP, OTP, and MP responded to this notice topic. MERC responded before the end of the comment period; the Department found MERC's response that it does not believe its current designation to be inaccurate as reasonable.⁴⁵ The Department requested affected utilities provide this information in supplemental comments (**Decision Option 18**). DEA, CPE, GP, OTP, and MP responded after the close of the comment period.⁴⁶ The Department intended to review supplemental utility filings and provide its recommendation in supplemental comments.

Staff Analysis

Staff recommends that, rather than a supplemental comment period, a more nuanced version of a question on this topic be prompted in the September 2025 comment period in the instant docket (**Decision Option 19**).

D. Landlord Data in Safety, Reliability, and Service Quality Reports

CUB/LSAP recommended requiring, "regulated utilities to provide a discussion in their next safety, reliability, and service quality reports about how they manage disconnections due to a landlord's failure to pay, consistent with the requirements of Minn. R. 7820.1400 (**Decision Option 20**)."

MP and MERC replied that they would be open to discussing this topic in SRSQ.

Staff is not aware of utilities violating Minn. R. 7820.1400 but sees that there could be value in providing this information in utilities' next SRSQ reports filed in spring 2026. Staff will prompt this discussion with the inclusion of an additional topic in the Notice of Comment.

⁴⁵ Comments from MERC, March 31, 2025, and Department, May 15, 2025, both in docket no. E,G-999/PR-25-2

⁴⁶ See supplemental comments filed in docket no. E,G-999/PR-25-2. GP (May 30, 2025) shared that it sends a bill insert explaining CWR policies to new customers and all customers pre-CWR season. GP also trains customer service reps on CWR policies. CPE (June 11, 2025) shared that it provides CWR information to all customers via a bill inserts and then makes additional home and phone visits to customers. MP (June 19, 2025) said that it includes all CWR protections offered and granted as "heat-affected," and that its CWR protections and outreach have been described in SRSQ filings in Docket No. E015/M-25-29 and on its website. For example, CWR info are online and given as a bill insert; two visit attempts are required before disconnecting a customer during which MP leaves a doorhanger summarizing customer Rights & Responsibilities. OTP (June 23, 2025) showed its disconnection timeline, said it mails CWR brochures, said when it has direct contact with customers, and that it considers all customers as heat affected during the CWR season. DEA (June 27, 2025) has a small number of non-heat-affected customers.

E. Staff's Information Requests to Xcel Energy

On December 20, 2024, Staff filed five information requests (IR) for Xcel. The Company responded on February 7, 2025. The content of the requests focused on a customer's right to appeal a payment plan during the CWR season under Minn. Stat. § 216B.096, specifically:

- 1) Training on CWR appeals process for customer service representatives
- 2) Notification of customers on their right to appeal payment plans
- 3) Description of the process to provide a customer with a CWR appeal form
- 4) How the CWR appeal process is described to customers
- 5) Why, when compared to a similar-sized utility, Xcel has sent fewer appeal forms

Department Response

It appeared to the Department that Xcel is following the CWR appeals process per Minn. Stat. § 216B.096, subd. 8. However, the Department wrote that if anyone provides an analysis that demonstrates Xcel is not following the CWR appeals process correctly, the Department would file supplemental comments on that topic.

Staff Analysis

Staff reviewed Xcel's filings and found the Company had responded to Staff's questions to the best of the Company's ability, save providing call recordings, which the IRs did not request. Staff recommends that rather than a supplemental comment period with the instant comment period, this topic be taken up again by stakeholders, if needed, as part of the September 2025 comment period in the instant docket (**Decision Option 21b**).

F. Utility Performance

To Staff's standard notice question, "What action, if any, should the Commission require utilities to take to continue exemplary performance or remedy unsatisfactory performance?", the Department responded that the Commission could remedy unsatisfactory performance via a quality-of-service plan (QSP) that includes financial penalties (disincentives) like that approved for Xcel.⁴⁷ MP addressed the Department's comment by stating, it did not need such a performance plan, that utility consent could be needed to develop such plans, and that any QSP would need a balance of incentives and penalties.⁴⁸ DEA states that specific measures or actions are necessary at this time.⁴⁹

Staff interpreted the Department's recommendation to mean that a type of QSP incentive mechanism could be adopted for other utilities if found necessary by the Commission. Staff

⁴⁷ Department comments filed May 15, 2025 in docket no. E,G-999/PR-25-2. Xcel's QSP dockets are 02-2034 and 12-383.

⁴⁸ MP supplemental comments filed June 19, 2025 in docket no. E,G-999/PR-25-2 at 4

⁴⁹ DEA initial comments, June 27, 2025, p. 8.

notes that Xcel's QSP was borne out of a Commission investigation and subsequent settlement. The record has not been sufficiently developed to justify creating QSPs for all utilities. At present, Staff is not convinced of the need for such plans nor has the current record been developed on the topic of QSPs.

G. Equity

With respect to Staff's standard notice question, "What does an analysis of the data reported in this docket reveal about equitable delivery of utility service?", the Department responded that if the Commission desires, then utilities other than Xcel could:

- 1) Provide the same information Xcel provides in its Interactive Equity and Service Quality Map⁵⁰, or
- 2) Explain the relative difficulty of gathering the information listed above and performing the linear regression analysis needed and to provide that information in a compliance filing.⁵¹

MP addressed the Department's comment by questioning the transferability of such mapping efforts to MP's unique service territory and concluded, "While we are open to engaging in conversations on this topic and exploring ways to further enhance our delivery service, we do not agree that conducting an equity analysis like Xcel Energy's is currently necessary."⁵² While DEA is contemplating ways to improve its member engagement, the Cooperative said that its service territory is relatively small so would result in a data collection issue and that compiling similar information to Xcel's data would be a large undertaking.

Staff notes that replicating Xcel's Interactive Service Quality Map is not the only way to judge provision of equitable service. Staff does not believe the record in this docket was developed to decide on requiring maps from other utilities, but if it was, Staff agrees that gauging the appropriateness of other utilities to provide the same data as Xcel could be a good place to start.

V. Conclusion

Two main topics could be decided upon by the Commission.

First, the Commission can make decisions on increased utility transparency and accessibility regarding disconnections, service deposits, and payment agreement policy and practice. In **Decision Options 1-8**, the Commission can provide guidance related to:

- 1) Immediate compliance filing on policies and practices,
- 2) Notification of any changes to policy or practice,
- 3) Explanation of down payment and deposit practices, and

⁵⁰ <https://experience.arcgis.com/experience/928c8b0e3cd3475fbb7c23b355c2df37>

⁵¹ Department comments filed May 15, 2025 in docket no. E,G-999/PR-25-2

⁵² MP supplemental comments filed June 19, 2025 in docket no. E,G-999/PR-25-2 at 4-5.

- 4) Posting policies and practices on utility website using CUB/LSAP's or CPE's language.

Second, the Commission can decide what action to take, if any, on GMG's late-filed CWR data (**Decision Option 14**).

Various reporting options are included in **Decision Options 9-13**. Other issues were raised during the instant comment period: reporting on ECO outreach in annual affordability docket; communication with non-English speakers; heat-affected customers; landlord data; utility performance and QSP; equity especially as demonstrated in interactive maps (**Decision Options 15-21**). Staff suggests the Commission determine whether to act on these additional topics later, either in other dockets or by prompting discussions in subsequent comment periods in this docket.

VI. Decision Options

Transparency and Accessibility in Utility Policy and Practice

1. Require rate-regulated public utilities that have not already done so to submit a compliance filing within 30 days in this docket detailing their current policies and practices on disconnections, service deposits, and payment agreements. *(CUB/LSAP with staff addition of date, MERC, GP, OTP, Xcel)*
2. Require Minnesota Power to file within 30 days in this docket an updated version of its 2019 Document detailing its current policies and practices on disconnections, service deposits, and payment agreements in a format like that of Xcel Energy and CPE but with a Microsoft Word readability score near an eighth grade reading level. *(Staff interpretation of MP suggestion)*
3. Require rate-regulated public utilities to file in Docket No. E, G-999/PR-YR-2 updated disconnection, service deposit, and payment agreement policies and practices whenever those policies or practices change. *(CUB/LSAP, MERC, Xcel)*
4. Require each rate-regulated public utility that requires down payments or service deposits to include an explanation of how those amounts are determined with its required monthly Residential Customer Status Report filings in Docket no. E, G-999/PR-YR-2. *(Staff modification of CUB/LSAP language, MERC)*
5. Require rate-regulated public utilities to display their disconnection, service deposit, and payment agreement policies and practices on their respective websites, and explain those procedures in clear, easy-to-understand language. *(CUB/LSAP, MERC, OTP, Xcel, MP)*
6. Require rate-regulated public utilities to post the following language on their respective websites in a conspicuous place:

[Choose Decision Option 6a AND/OR one of Decision Options 6b, 6c, or 6d AND/OR Decision Option 6e, or choose none.]

- a. Under Minnesota law, [UTILITY NAME] customers are entitled to a payment agreement for the payment of overdue bills. This payment agreement must consider a customer's financial circumstances and any extenuating circumstances of the household. *(CUB/LSAP, MERC, GP, OTP, Xcel, MP)*
- b. If the payment agreement terms offered are not affordable to you, or if your household is facing financial or extenuating circumstances, you should contact a(n) [UTILITY NAME] customer account representative at [PHONE NUMBER and/or EMAIL ADDRESS]. *(CUB/LSAP, MERC, GP, OTP, Xcel, MP)*

[OR]

- c. If the current bill is not affordable to you, or if your household is facing financial or extenuating circumstances, you should contact a CenterPoint Energy customer account representative at 800-245-2377 and/or Company can provide a link for the "contact us" form. *(CPE)*

[OR]

- d. If the current bill or payment agreement terms offered are not affordable to you, or if your household is facing financial or extenuating circumstances, you should contact a CenterPoint Energy customer account representative at 800-245-2377 and/or Company can provide a link for the "contact us" form. *(CPE)*
 - e. If you are unable to reach a mutually agreeable arrangement with a customer account representative, you may appeal the decision with the Minnesota Public Utilities Commission's Consumer Affairs Office. The Consumer Affairs Office can be contacted at 651-296-0406 or 800-657-3782, or by email at consumer.puc@state.mn.us. *(CUB/LSAP, MERC, GP, OTP, Xcel, MP)*
7. Require rate-regulated public utilities to submit customer-facing language on disconnection, deposit, downpayment, and payment arrangement to the CAO for review and approval. *(MP with Staff addition after consult with CAO)*
 8. Require rate-regulated public utilities to print CAO-approved language on disconnection, service deposit, and payment agreement policies and practices on physical means of communication with customers including but not limited to door hangers, disconnection notices, and bills. *(Staff)*

Additional Data

[Choose one or neither from Decision Options 9a-b and Decision Options 10a-b.]

9. Require rate-regulated public utilities to detail in their next Residential Customer Status Report:

- a. The average down-payment amount received from customers—both as a percentage of arrears and as a total dollar value—during CWR and non-CWR months. (*CUB/LSAP, MERC*)
- b. How they have implemented the statutorily required consideration of both financial and extenuating circumstances for payment agreements during CWR and non-CWR months. (*CUB/LSAP*)

[OR]

10. Require rate-regulated public utilities to detail in their next, filed in 2026, annual safety, reliability and service quality reports:

- a. The average down-payment amount received from customers—both as a percentage of arrears and as a total dollar value—during CWR and non-CWR months. (*MP*)
- b. How they have implemented the statutorily required consideration of both financial and extenuating circumstances for payment agreements during CWR and non-CWR months. (*MP*)

11. Require Xcel Energy and CenterPoint Energy to track the effects of the recently approved policies on service deposit, disconnection, payment arrangements, and various customer protections and assistance and the effects of those changes on each Company's bad debt expense, and to file that information, in this docket within 90 days of the Order. The filing shall contain one year of actual data from the most recent 12 months as of the Order. (*Staff modification to Department*)

[Choose one or neither from Decision Options 12 and 13.]

12. Require rate-regulated public utilities, excluding Xcel Energy and CenterPoint Energy, to make a compliance filing within 30 days in Docket No. E,G999/PR-YR-2 on their complaint resolution efforts. (*Department with Staff addition of date*)

[OR]

13. Delegate authority to the Executive Secretary to include a prompt to rate-regulated public utilities in the forthcoming Notice of Comment Period to be issued in this docket in September 2025 to explain their complaint resolution process. (*Staff*)

Greater Minnesota Gas Reporting

14. Find that Greater Minnesota Gas failed to file weekly reports required by Minn. Stat. § 216B.096 forty-six times and failed to file monthly reports required by Minn. Stat. § 216B.091 fourteen times. Refer the matter to the Attorney General to take appropriate legal action. (*OAG, CUB/LSAP*)

Other Topics

15. Require regulated utilities to include in their next annual affordability program reports, filed in 2026, a description of their current outreach activities to low-income customers about free and low-cost ECO programs. Require utilities to propose methods for improving ECO outreach to affordability program participants. *(CUB/LSAP)*

[Choose one or neither from Decision Options 16 and 17.]

16. Require rate-regulated public utilities other than MERC, GP, CPE, and Xcel to explain how they currently communicate information on disconnection and payment arrangement policies to non-English language speakers, especially to people that do not read their native language in supplemental comments filed within 30 days in in docket no. E,G999/PR-YR-2. *(Department with staff addition of date and location)*

[OR]

17. Delegate authority to the Executive Secretary to include the following prompt to rate-regulated public utilities in the forthcoming Notice of Comment Period to be issued in this docket in September 2025: How do utilities currently communicate information on disconnection and payment arrangement policies to non-English language speakers, especially to people that do not read their native language? *(Staff)*

[Choose one or neither from Decision Options 18 and 19.]

18. Require each rate-regulated public utility other than MERC, CPE, and GP to file supplemental comments within 30 days in this docket explaining how it provides heat-affected customers, particularly customers with electricity service necessary to operate gas heating equipment, with appropriate protections during CWR season (October 1 – April 30), including site visits before any disconnections for non-payment, and how the utility ensures that its records of heat-affected customers are accurate. *(Department with Staff addition of date and location)*

[OR]

19. Delegate authority to the Executive Secretary to include the following prompt to rate-regulated public utilities in the Notice of Comment Period to be issued in this docket in September 2025: Are utilities' heat-affected customers, particularly those with electricity service necessary to operate gas heating equipment, being provided with appropriate protections during CWR season (October 1 – April 30), including site visits before any disconnections for non-payment? How are utilities ensuring that their records of heat-affected customers are accurate? *(Staff)*

20. Require regulated public utilities to provide a discussion in their next, filed in 2026, safety, reliability, and service quality reports about how they manage disconnections due to a landlord's failure to pay, consistent with the requirements of Minn. R. 7820.1400. Regulated utilities must also explain how they have implemented the



statutorily required consideration of both financial and extenuating circumstances for payment agreements during CWR and non-CWR months. (*CUB/LSAP, MP, MERC*)

Other Questions for a Subsequent Comment Period in Docket No. E, G-999/PR-YR-2

21. Delegate authority to the Executive Secretary to include the following prompt(s) in the forthcoming Notice of Comment to be issued in the instant docket in September 2025:
 - a. For rate-regulated public utilities, for as many customers as possible who in 2025 made deposits or downpayments, please provide data on deposit or downpayment amount as a percent of the customer's income. If this information is not possible to obtain or share, please explain why. (*Staff*)
 - b. Are rate-regulated public utilities following the CWR appeal process in Minn. Stat. § 216B.096, subd. 8? (*Department modified by Staff*)

No Action Option

22. Take no action on the Residential Customer Status Data reporting in Docket No. E, G999/PR-25-2 currently (*Department, MP*)