

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

Katie Sieben	Chair
Hwikwon Ham	Commissioner
Valerie Means	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

In the Matter of Xcel Energy's Tariff Revisions  
Updating Community Solar Garden Tariff  
Providing Additional Protection in  
Subscription Eligibility

Docket No. E002/M-21-695

In the Matter of the Petition of Northern  
States Power Company, D/B/A Xcel Energy, for  
Approval of its Proposed Community Solar  
Garden Program

Docket No. E002/M-13-867

**Reply Comments of the Citizens Utility Board of Minnesota**

The Citizens Utility Board of Minnesota ("CUB") submits these Reply Comments in response to the Commission's February 9, 2024 Notice of Comment Period<sup>1</sup> (the "Commission Notice") and initial comments parties submitted on March 8, 2024. Again, we appreciate the efforts of Xcel Energy ("Xcel") and the Department of Commerce ("the Department") to propose changes to Xcel's billing system to address the concerns raised in this docket. We also appreciate the initial comments submitted by the Department, Energy CENTS Coalition ("ECC"), and Mid-Minnesota Legal Aid and Legal Service Advocacy Project (collectively, "Legal Aid"). We briefly reply to other parties' initial comments below. Ultimately, while we believe the tariff modifications proposed by ECC provide helpful direction in addressing remaining complications under the *In Care of Billing* model, additional confusion remains as to how the Building Subscription Model can be utilized effectively for all Xcel customers.

**I. DISCUSSION**

A. Reply to Department Initial Comments.

In initial comments, the Department notes it agrees with Xcel that "the *In Care Of* option expands upon the tariff approved by the Commission in August 2023. Customers can receive bill credits through the building subscription model and can also access energy assistance programs through the *In Care Of*

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<sup>1</sup> *In the Matter Xcel Energy's Tariff Revisions Updating Community Solar Garden Tariff Providing Additional Customer Protections in Subscription Eligibility*, Notice of Comment Period, Docket No. E002/M-21-695 (Feb. 9, 2024) ("Commission Notice").

option.”<sup>2</sup> We agree the objective of the *In Care of Billing* option is to allow a tenant to both receive bill credits through the Building Subscription Model and to retain access to energy assistance programs. However (for the reasons discussed in more detail in our initial comments) we respectfully disagree this objective is met under the *In Care of Billing* proposal as it is described in the Compliance Filing.

The Compliance Filing presents the *In Care of Billing* option as an alternative to the “opt-in” option previously approved in this docket—i.e., “[i]f a customer chooses to not Opt-In to the CSG where the landlord is the named customer on the Company account. . . [then] the tenant can enroll in our expanded In Care of Billing process to allow the landlord to receive copies to their monthly utility bills.”<sup>3</sup> Additional tariff modifications are needed to make the *In Care of Billing* model compatible with the opt-in model, such that a tenant can both opt in to the Building Subscription Model and enroll in *In Care of Billing*.

#### B. Reply to ECC Initial Comments.

In initial comments, ECC proposed additional modifications to Xcel’s tariffs seeking to accommodate and clarify tenant protections under *In Care of Billing* model by ensuring that tenants who opt in to the Building Subscription Model are also enrolled in *In Care of Billing*. In theory, this would allow a tenant to earn a CSG bill credit through the building subscription model while retaining most of the consumer protections afforded them as an Xcel account holder. Upon further review of ECC’s comments, we believe that the *In Care of Billing* option, as proposed in Xcel’s Compliance Filing, is not fully workable *without* additional tariff modifications. ECC’s recommended tariff changes provide helpful direction on what those tariff modifications would require.

That said, even with the proposed tariff modifications described in ECC’s initial comments, the Building Subscription Model continues to raise concerns around potential consumer harm—particularly for those most in need of statutory consumer protections applicable to regulated utilities and their customers. As noted in our initial comments, CUB shares ECC’s concerns about customer awareness, financial harm, LIHEAP participation, Cold Weather Rule Protection, and reliance on internet access.<sup>4</sup> Moreover, further discussions with Xcel, ECC, and Legal Aid reveal that additional complications arising under the Building Subscription Model remain unaddressed, even with the tariff modifications ECC proposed. It is our understanding each of these parties will discuss these complications further in reply comments.

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<sup>2</sup> *In the Matter of Xcel Energy’s Tariff Revisions Updating Community Solar Garden Tariff Providing Additional Customer Protections in Subscription Eligibility*, Department of Commerce Initial Comments, Docket No. E-022/M-21-695 (March 8, 2024) (“Department Initial Comments”), p. 4.

<sup>3</sup> *In the Matter of Xcel Energy’s Tariff Revisions Updating Community Solar Garden Tariff Providing Additional Customer Protections in Subscription Eligibility*, Compliance Filing, Docket No. E-022/M-21-695 (Jan. 16, 2024) (“Compliance Filing”), p. 2.

<sup>4</sup> *In the Matter of Xcel Energy’s Tariff Revisions Updating Community Solar Garden Tariff Providing Additional Customer Protections in Subscription Eligibility*, Energy CENTS Coalition Initial Comments, Docket No. E-022/M-21-695 (March 8, 2024) (“ECC Initial Comments”), p. 3-6.

C. Reply to Legal Aid Initial Comments.

The Legal Aid organizations oppose approval of Xcel's January 16, 2024 Compliance Filing and oppose the ongoing use of the Building Subscription Model, even as modified to include the *In Care of Billing* option. In support of this position, Legal Aid calls attention to several lawsuits and regulatory actions that exemplify ongoing problems associated with landlord/third-party re-billing of regulated utility service.<sup>5</sup> To be clear, we appreciate and share Legal Aid's concerns and agree problems associated with re-billing of regulated utility service demands further attention.

That said, we also agree with Legal Aid's recognition that "it is beyond the scope of this docket to address the broader issue of landlord and third-party billing and re-billing of regulated utility service."<sup>6</sup> CUB strongly supports legislative action to place parameters around how utility re-billers operate in Minnesota—whether or not that re-billing service is offered as part of a Building Subscription Model. We are hopeful such legislation would promote transparency and preserve consumer protections in instances when landlords/re-billers step between a utility and its customers.

**II. CONCLUSION**

Again, we appreciate the efforts of Xcel and the Department to propose changes to Xcel's billing system to address the concerns raised in this docket. The Compliance Filing describes some helpful improvements to Xcel's billing system. In particular, we recommend the Commission approve Xcel's proposed adjustments to its billing system that ensure PowerON customers' participation in that program is more transparently reflected on their bills. However, in light of the additional complications and concerns others have raised, we are not convinced the *In Care of Billing* option addresses the problems discussed in this docket—at least not more effectively than the Opt-in and Opt-out provisions previously approved. It is our understanding Xcel and ECC will propose to evaluate the effectiveness of the Opt-In and Opt-Out provisions of Xcel's tariff sheet 9-99.1 by requesting developers first identify if they follow the Building Subscription Model and if so, that they report monthly tenants who opt in and opt out of that model. CUB supports this proposal to help evaluate the effectiveness of the tariff modifications previously approved in this docket.

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<sup>5</sup> *In the Matter of Xcel Energy's Tariff Revisions Updating Community Solar Garden Tariff Providing Additional Customer Protections in Subscription Eligibility*, Legal Aid Organizations Initial Comments, Docket No. E-022/M-21-695 (March 8, 2024) ("Legal Aid Initial Comments"), 5-6.

<sup>6</sup> Legal Aid Initial Comments at 5.

Sincerely,

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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_21-695_21-695
Kevin	Cray	kevin@communitysolaraccess.org	CCSA	1644 Platte St  Denver, CO 80202	Electronic Service	No	OFF_SL_21-695_21-695
Timothy	DenHerder Thomas	timothy@cooperativeenergyfutures.com	Cooperative Energy Futures	3500 Bloomington Ave. S  Minneapolis, MN 55407	Electronic Service	No	OFF_SL_21-695_21-695

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-695_21-695
Ron	Elwood	relwood@mnlsap.org	Legal Services Advocacy Project	970 Raymond Avenue Suite G-40 Saint Paul, MN 55114	Electronic Service	No	OFF_SL_21-695_21-695
Betsy	Engelking	betsy@nationalgridrenewables.com	National Grid Renewables	8400 Normandale Lake Blvd  Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-695_21-695
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_21-695_21-695
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-695_21-695
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Hal	Galvin	halgalvin@comcast.net	Provectus Energy Development llc	1936 Kenwood Parkway  Minneapolis, MN 55405	Electronic Service	No	OFF_SL_21-695_21-695
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Cliff	Kaehler	cliff.kaehler@novelenergy.biz	Novel Energy Solutions LLC	4710 Blaylock Way Inver Grove Heights, MN 55076	Electronic Service	No	OFF_SL_21-695_21-695

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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	Yes	OFF_SL_21-695_21-695
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Russ	Stark	Russ.Stark@ci.stpaul.mn.us	City of St. Paul	Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-695_21-695
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John	Vaughn	Nik@rreal.org	Rural Renewable Energy Alliance	3963 8th Street SW  Backus, MN 55435	Electronic Service	No	OFF_SL_21-695_21-695
Kevin	Walker	KWalker@beaconinterfaith.org	Beacon Interfaith Housing Collaborative	N/A	Electronic Service	No	OFF_SL_21-695_21-695