June 4, 2021

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket Nos. G004/M-21-217, G011/M-21-224, G002/M-21-220, G008/M-21-218, and G022/M-21-221.

Dear Mr. Seuffert:

Attached are the Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

The Annual Gas Affordability Program (GAP) Reports for:

- Great Plains Natural Gas Company
- Minnesota Energy Resources Corporation
- Northern States Power Company
- CenterPoint Energy Minnesota Gas
- Greater Minnesota Gas, Inc.

The Reports were filed on March 31, 2021 by:

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The Department recommends that the Commission **accept the utilities' reports, as well as approve CenterPoint Energy's requests to adjust its surcharge**. The Department will provide final recommendations on CenterPoint's and Xcel's proposed benefit changes in reply comments. The Department is available to answer any questions that the Minnesota Public Utilities Commission may have.

Sincerely,

/s/STEPHEN COLLINS	/s/MICHAEL N. ZAJICEK	/s/GEMMA MILTICH
Financial Analyst	Rates Analyst	Financial Analyst, CPA

MZ, SC, & GM/ja
Attachment

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce
Division of Energy Resources

Docket Nos. G004/M-21-217, G011/M-21-224, G002/M-21-220,
G008/M-21-218, and G022/M-21-221

I. INTRODUCTION

Gas Affordability Programs (GAPs) are governed by Minnesota Statutes 216B.16, Subdivision 15. These programs are designed to reduce the proportion of income that low-income customers dedicate to paying their energy bills. Under a GAP, a customer participant makes more frequent bill payments and receives assistance with payments in arrears that they may have. The GAP must be administered such that it reduces the utilities' bill collection activity costs and effectively coordinates with conservation resources and other applicable low-income bill payment assistance programs. Each Minnesota public utility administering a GAP submits an annual report containing the required statistics and information relevant to the program's performance over the last year. On March 31, 2021, five natural gas utilities with a GAP submitted their annual 2020 reports (the 2020 GAP Reports, collectively) in the following dockets:

- Great Plains Natural Gas Company (Great Plains), G004/M-21-217
- Minnesota Energy Resources Corporation (MERC), G011/M-21-224
- Xcel Energy Gas (Xcel), G002/M-21-220
- CenterPoint Energy Minnesota Gas (CenterPoint), G008/M-21-218
- Greater Minnesota Gas, Inc. (GMG), G022/M-21-221

The annual GAP reports enable the Minnesota Public Utilities Commission (Commission) to monitor the utilities' administration of these affordability programs in the years between the GAP Evaluation Reports, which cover multiple program years.

On April 16, 2021, the Commission issued a Notice of Comment Period that listed the following topic areas open for comment for the utilities' 2020 GAP Reports:

- Should the Commission accept the Natural Gas Utilities' 2020 Gas Affordability Program (GAP) annual reports?

- Should the Commission approve CenterPoint Energy's request to increase its Surcharge rate to $0.00264 per therm from $0.00236 per therm?

- Should the Commission authorize CenterPoint Energy to reduce payment requirement from 6% to 3% of its participating Customers' income?

- Are there other issues or concerns related to this matter?

II. DEPARTMENT ANALYSIS

The Minnesota Department of Commerce, Division of Energy Resources (Department) reviews the annual GAP reports to determine whether they comply with the reporting requirements as outlined in statutes or Commission order. A list of the reporting requirements is provided in Department Attachment 1 to the instant Comments.

A. SUMMARY SCHEDULE INFORMATION – REQUIRED FOR ALL UTILITIES WITH A GAP

Each utility administering a GAP is required to submit a set of summary schedule information in its annual GAP filing. The following table combines the summary schedule information provided by the utilities in their 2020 GAP Reports. The Department concludes that the utilities provided the summary schedule information as required. Dollar values and percentages in Table 1 are rounded to the nearest whole number.

Table 1: Summary Schedule GAP Information Reported for the 2020 Program Year

Summary Schedule Item	*CenterPoint*	*Xcel*	*Great Plains*	*MERC*	*GMG*
Average annual affordability benefit received per customer	$317	$175	$232	$443	$386
Average annual arrearage forgiveness benefit received per customer	$224	$167	$83	$76	$34
Annual program budget	$5,000,000	$2,500,000	$50,000	$750,000	$20,000
Actual program revenue	$664,135	$2,760,447	$38,702	$2,686,903	$0
Actual program cost	$3,671,321	$1,932,190	$52,945	$629,009	$20,757
GAP tracker balance as of year end	($1,897,654)	$2,257,914	($19,249)	$2,280,485	($70,334)[1]
GAP rate-affordability surcharge ($) per therm	0.00236	0.00445	0.01393[2]	0.00905	0
Non-GAP LIHEAP Baseline Disconnection Rates					
1) GAP participants	0.8%	0.03%	0%	0%	0%
2) Non-GAP LIHEAP customers	1.2%	0.24%	0%	0.57%	0%
3) Non-LIHEAP residential customers	0.3%	0.02%	0%	0.13%	0%
Pre-Program Baseline Disconnection Rates					
1) GAP participant cohort	0%	0.14%	0%	0%	N/A
2) GAP participant cohort before enrolling in GAP	0.8%	6%	1%	0%	N/A
LIHEAP Customers' Participation in GAP					
% of LIHEAP customers that participated in GAP	41%	42%	19%	9.6%	26%
GAP Enrollment					
GAP participants enrolled as of year end	8,442	5,022	189	1,174	26
GAP participants enrolled and receiving benefits at some point during the year	9,179	7,683	224	1,304	30

[1] GMG has not established an official tracker for its GAP but does maintain an unofficial GAP tracker balance, which includes the GAP credits given to customers and all program costs.
[2] In Docket No. G004/M-20-395, the Commission authorized a higher GAP surcharge of $0.02295, effective December 1, 2020, for Great Plains. Great Plains applied the earlier approved surcharge of $0.01393 from January – November 2020.

B. SELECT STATISTICS AND OTHER PROGRAM INFORMATION – REQUIRED FOR ALL UTILITIES WITH A GAP, EXCEPT GMG

Utilities that administer a GAP are required to include in their annual GAP reports certain statistics and program information beyond the summary schedule data shown in Table 1 of the instant Comments. The following sections 1 –7 provide a brief explanation of these additional reporting requirements and a summary of select GAP data submitted by each of the relevant utilities. The Department concludes that the applicable utilities provided the required GAP information discussed in sections 1 – 7.

1. Payment Frequency

Utilities are required to report on how and to what extent their GAP impacts customer payment frequency. Specifically, utilities must submit information that includes (1) a comparison of the customer payment frequency before and after the customer was enrolled in the GAP, (2) a comparison of the customer payment frequency for GAP versus LIHEAP grant recipients, and (3) partial and late payment information as it relates to the required payment frequency data. A utility may elect to provide supplementary payment frequency information that is not specifically required. The payment frequency information in Table 2 summarizes the relevant data provided by the utilities for the GAP year 2020. The payment frequency percentage measures shown in Table 2 include (1) A = (dollars paid ÷ dollars requested) and (2) B = (number of payments paid ÷ number of payments requested). Note that amounts over 100% reflect that energy assistance dollars in combination with customer payments can result in a credit balance on the customer's account.

Table 2: GAP Payment Frequency Statistics for the 2020 Program Year

Customer Group	*Payment Frequency Measures*	*CenterPoint*	*Xcel*	*Great Plains*	*MERC*
Non-GAP LIHEAP Baseline					
1) GAP participants	$ paid / requested	33%	98%	59%	53%
	# payments / requested	60%	75%	54%	151%
2) Non-GAP LIHEAP customers	$ paid / requested	36%	91%	21%	95%
	# payments / requested	50%	73%	38%	89%
3) Non-LIHEAP residential customers	$ paid / requested	89%	97%	79%	96%
	# payments / requested	91%	89%	82%	91%
Pre-Program Baseline					
1) GAP participant cohort	$ paid / requested	33%	110%	59%	80%
	# payments / requested	60%	93%	54%	82%
2) GAP participant cohort before enrolling in GAP	$ paid / requested	19%	76%	42%	87%
	# payments / requested	49%	75%	43%	75%

2. *Payment Amounts*

Annual GAP reports must include information about the effect of the GAP on bill payment amounts. At a minimum, the GAP report payment amount data must incorporate the average annual and monthly bill credit amounts compared to the average GAP participant’s annual and average monthly bill and arrearage amounts. Table 3 provides a summary of the annual payment amount data submitted by the relevant utilities for the GAP year 2020.

Table 3: GAP Payment Amount Statistics for the 2020 Program Year

Payment Amount Statistic	*CenterPoint*	*Xcel*	*Great Plains*	*MERC*
A: Average annual affordability benefit per participant	$317	$175	$232	$443
B: Average annual arrearage forgiveness benefit per participant	$224	$167	$83	$76
C: Average total benefit per participant	$541	$240	$227	$449
D: Average annual bill per participant	$838	$1,096	$708	$655
E: Average arrearage balance per participant	$377	$178	$60	-$1,050
(A/D) = average annual affordability benefit as a percentage of the average annual bill	38%	16%	33%	68%
(B/D) = average annual arrearage forgiveness benefit as a percentage of the average annual bill	27%	15%	12%	12%
(C/D) = average total benefit as a percentage of the average annual bill	65%	22%	32%	69%
(B/E) = average annual arrearage forgiveness benefit as a percentage of average arrearage balance per participant	59%	94%	138%	n/a

3. Payments in Arrears

The GAP impacts the level of customer payments in arrears; utilities with a GAP must report the change in arrearage levels between the last two program years for certain customer classes. Table 4 summarizes the data provided by the applicable utilities on payments in arrears for program year 2020. In Table 4, negative values indicate that the arrearage level decreased, while positive figures denote an increase in arrearage level.

Table 4: Percentage Change in Dollar Amount of Payments in Arrears between Program Years 2019 and 2020

Customer Group	*CenterPoint*	*Xcel*	*Great Plains*	*MERC*
Non-GAP LIHEAP Baseline				
1) GAP participant	(7%)	(6%)	(66%)	(64%)
2) Non-GAP LIHEAP customer	46%	56%	0%	55%
3) Non-LIHEAP residential customer	46%	113%	36%	75%

4. *Program Retention*

The applicable utilities must report the GAP participant retention rate for the relevant program year. The utilities provided the following retention rates, as a percentage, for the program year 2020:

- CenterPoint – 73%
- Xcel Energy – 67%
- Great Plains – 84%
- MERC – 89%

5. *Customer Complaints*

The annual GAP reports must include information on the number and type of customer complaints associated with the program and received by the utilities during the program year. CenterPoint, Xcel, Great Plains, and MERC reported receiving one, zero, zero, and zero customer complaints, respectively, for program year 2020.

6. *Collections*

GAP reporting guidelines require that the relevant utilities submit information about how the number of payments required of participants under the program have affected the utilities' bill collection activities. Through a review of their bill collection activities and related data points, CenterPoint, Xcel Energy, Great Plains, and MERC concluded that the increased number of payments made by GAP participants has correspondingly reduced the companies' bill collection activities.

7. *Coordination with Other Resources*

Each applicable utility provided a summary on its coordination efforts with other resources and assistance programs related to the administration of the GAP. This required reporting is further condensed and presented in Table 5.

Table 5: Coordination Efforts with other Resources for GAP Administration in the 2020 Program Year

Utility	*Summary of Coordination Efforts*
CenterPoint	• Coordinated with conservation programs, Hennepin County, Benton County, Sherburne County, Stearns County, and other organizations
Xcel	• Coordinated with Energy CENTS Coalition (ECC) to improve communication and outreach to low-income households • Participated in Safety Net Meetings with Ramsey County and the quarterly MN Energy Assistance Policy Action Committee
Great Plains	• Coordinated and communicated with all agencies providing bill payment assistance in its service territory • Posted the GAP application on third-party administrator's website (and Great Plains' website) • Provided information and applications forms were also provided to all energy assistance agencies in Great Plains' service territory
MERC	• Coordinated with the Salvation Army for administration of GAP and other supporting services; the Salvation Army provides GAP participants with referrals to a variety of other programs, including energy, food, rental, and financial planning assistance • Communicated with the Minnesota Energy Assistance program to refer assistance recipients to GAP

C. SELECT STATISTICS AND OTHER PROGRAM INFORMATION FOR CENTERPOINT

CenterPoint is required to report on several additional information items beyond the disclosures prescribed for other natural gas utilities.

1. Conservation Measures

The Department concludes that CenterPoint provided the required conservation measures information. The Department summarizes this reported information in the following table.

Table 6: CenterPoint's Conservation Measures for GAP in Program Year 2020

Reporting Item	*Description*
Potential no-cost conservation measures that could be implemented in the households of GAP participants, either on their own or part of its Conservation Improvement Program	• Lowering thermostat and/or installing a programmable unit • Changing furnace filters regularly • Lowering water heater setting • Opening and closing drapes according to season and time of day • Maintaining open air flow around heating registers • High-efficiency showerhead and faucet aerator • Window, door, and attic hatch weather-stripping • Home energy audit; weatherization • Furnace repair/replacement/tune-up • Boiler repair/replacement/tune-up • Pipe and water heater insulation • Water heater assessment and replacement
Plans to encourage GAP participants to increase their use of these measures	Cross-promotion of programs with GAP

2. Customer Eligibility

The Department concludes that CenterPoint has provided, as required, the number of customers who were not eligible for credits, including zero credit customers. For 2020, CenterPoint found that 2,641 customers applied for GAP but did not qualify for credits based on their income and usage.

3. Additional Reporting Required for CenterPoint

The Department concludes that CenterPoint provided the information required by Point 8 of the Commission's November 5, 2020 *Order* in the gas utilities' 2019 GAP Reports.[3] The Commission's November 5, 2020 *Order* required that CenterPoint do the following in its future GAP reports:

a. provide the costs for each outreach activity associated with increasing LIHEAP and GAP participation and retention;
b. report the monthly number of LIHEAP and GAP customers compared to those numbers in the same months for the previous three years;
c. provide the average annual and range (low to high) of LIHEAP and GAP customer natural gas usage levels;

[3] Docket Nos. G004/M-20-395, G011/M-20-397, G002/M-20-398, G008/M-20-399, and G022/M-20-400.

d. report on specific efforts to coordinate participation in LIHEAP, GAP, and CIP programs, including CenterPoint's mapping process to target CIP resources based on natural gas usage and census tract demographic data; and
e. standardize the method for reporting allowable, incremental and total GAP administrative costs, using the March 31, 2020 report in Docket No. 20-399 as the format, and continue to provide the percentage of program costs represented by administrative costs.

According to CenterPoint the Company spent the following amounts on outreach activities for increasing LIHEAP and GAP participation and retention:

- $20,516 for 25,338 Mailings from February through June 2020;
- $5,532 for 3,268 calls in July 2020;
- $5,083 for 3,010 calls made from July 2020 though September 14, 2020; and
- $15,648 for 10,422 calls from July 2020 through December 14, 2020.

CenterPoint provided the requested data on the monthly customer counts for the LIHEAP and GAP programs since 2017 in Tables 21 and 22 of its initial filing. The Department included this data in Table 7 below.

Table 7: LIHEAP and GAP Monthly Customer Counts

LIHEAP Customers												
Month	Jan	Feb	Mar	Apr	May	June	Jul	Aug	Sep	Oct	Nov	Dec
2017	4,766	2,273	1,862	1,659	461	944	77	3	-	53	8,979	3,859
2018	2,119	2,616	2,127	1,658	1,543	647	100	-	-	4	10,115	3,859
2019	3,781	1,797	1,685	1,712	1,482	649	98	-	-	3	7,780	3,328
2020	4,247	2,658	1,586	934	763	800	1,116	23	-	1	6,425	3,921
2021	2,694											
GAP Customers												
Month	Jan	Feb	Mar	Apr	May	June	Jul	Aug	Sep	Oct	Nov	Dec
2017	5,974	6,563	7,536	8,124	9,461	9,863	9,767	9,531	9,512	9,524	9,555	9,521
2018	6,150	6,829	7,846	8,523	9,325	9,710	9,436	9,585	9,482	9,554	9,604	9,559
2019	6,667	7,434	8,420	8,672	9,652	10,233	9,829	9,813	9,518	9,113	8,621	8,583
2020	5,733	6,343	6,983	7,957	8,842	9,477	9,901	8,853	8,888	8,899	8,888	8,852
2021	4,600											

The Commission also required CenterPoint to provide the average and range of natural gas usage by LIHEAP and GAP customers. Table 8 below summarizes CenterPoint's data. The Department notes that it is unclear if CenterPoint does not have data for low usage or if the format of the data displayed a usage of 0 as a dash. The Department requests that CenterPoint clarify in reply comments if CenterPoint has the low use data for LIHEAP and GAP customers, and what those amounts are.

Table 8: LIHEAP and GAP Customer Natural Gas Usage (Therms)

	2015	*2016*	*2017*	*2018*	*2019*	*2020*
LIHEAP						
Average	780.0	744.0	804.0	836.0	928.8	828.0
Low	-	-	-	-	-	-
High	7,564.8	6,823.2	4,689.6	9,186.0	9,126.0	8,570.4
GAP						
Average	900.0	864.0	924.0	1,068.0	1,068.0	943.2
Low	-	-	-	-	-	-
High	7,564.8	6,192.0	6,637.2	6,891.6	6,552.0	6,081.6

The Commission also required CenterPoint to report on specific efforts to coordinate participation in LIHEAP, GAP, and CIP programs, including CenterPoint's mapping process to target CIP resources based on natural gas usage and census tract demographic data. CenterPoint included information meeting this requirement in its Coordination with Other Resources section of its initial filing. Specifically, CenterPoint noted that all low-income and residential conservation measures are available to GAP customers and the CenterPoint conducted the following cross proportional efforts:

- 25,000 direct mail pieces to LIHEAP recipients promoting GAP;
- 33,000 emails promoting GAP and other energy savings tips;
- 77,000 live or automated calls directed to customers not previously enrolled in LIHEAP, those enrolled in LIHEAP but not in GAP, and those that had past due balances;
- Distributed CIP conservation calendars with energy tips to income-qualified customers; and
- Created More Comfort, Less Energy Booklets with energy saving tips and how to instructions that were the distributed to low income households via low income agencies.

The Company also discussed its Minnesota Community Profile Dashboard tool that utilizes, which uses mapping and census data to target CIP resources, noting that in 2020 it met to share and discuss the generated data with community partners including the Center for Energy and Environment, the City of Bloomington, the City of Edina, the City of Saint Louis Park, and the Minneapolis Energy Vision Advisory Committee.

Finally, CenterPoint provided the required data on the program administrative costs, including the percent of total expenses. CenterPoint reported total administrative costs of $400,324 in 2020, which was approximately 10.9% of total program costs. As these costs exceeded the 5% cap the company adjusted the tracker to account for only $183,566 of administrative costs. The Department confirmed this calculation.

4. Request to Increase Program Surcharge

Point 3 of the Commission's August 19, 2019 *Order* in Docket No. G008/M-19-255 required CenterPoint to evaluate annually its GAP surcharge rate based on forecasted GAP expenditures and rate-case approved sales. In the instant proceeding, CenterPoint proposed to increase its GAP surcharge rate from $0.00236 to $0.00264 per Dth, effective October 1, 2021.

The goal of CenterPoint's proposed change in GAP surcharge rate is to bring the GAP tracker balance as close to zero as possible over the forecasted time-period, October 1, 2021 to December 2022. Schedules E and F in CenterPoint's filing show that, when using applicable forecasted sales and proposed GAP surcharge rate, the ending balance of the GAP tracker account at December 2022 is forecasted to be an under-recovered amount of approximately $8,396. Without the proposed change in the surcharge rate, the forecasted ending tracker balance would be an approximate over-recovered amount of $421,597 by December 2022.[4]

The Department agrees with CenterPoint's assessment of its GAP surcharge rate and the need to adjust the surcharge upward in order to reach a GAP tracker balance near zero by December 2022. The Department recommends that the Commission approve CenterPoint's request to adjust its GAP tracker surcharge rate.

5. Request to Decrease Payment Requirement

On page 1 of CenterPoint's initial filing CenterPoint states that it is proposing to reduce the GAP participant payment requirement from 6 to 3 percent of the GAP participant's income. CenterPoint's actual proposal, as found on page 23 of its initial filing, is to increase the affordability and arrearage forgiveness benefits under the Program. Specifically, CenterPoint

[4] Schedule F, page 2, line 3 under the "Dec 22" column in CenterPoint's March 31, 2021 filing in G008/M-21-218.

proposes to calculate the affordability credit as one-twelfth of the difference between CenterPoint's estimate of the customer's annual gas bill and 2% of the customer's household income, as compared to the current comparison to 4% of the customer's household income, and calculate the credit to retire participant arrears over 12 months with a customer contributing no more than 1% of their household income, as compared to the current 2% of the customer's income. CenterPoint does not provide any estimates of the impact on overall GAP spending this change would entail. CenterPoint does, however, request a removal of the overall program spending cap due to uncertainty as to the number of customers that may seek to participate in the GAP program following the resumption of disconnection activity.

The Department reviewed CenterPoint's proposal and concludes that it would serve to increase benefits to customers, and that it is possible that those increased benefits would make removing or raising the program spending cap necessary. However, the Department requests that CenterPoint provide in reply comments data projecting what the overall change in the cost of the GAP program would be if these changes were made. Specifically, if these changes were made in the previous year, what would the impact on overall spending have been on the current report.

Additionally, the Department notes that CenterPoint has generally high administrative costs for its GAP program, 10.9% of total program costs as reported above, well above the 5% recovery cap. The Department is concerned that increasing the program's overall spending would also serve to allow CenterPoint to recover a higher portion of the above cap costs.

The Department will make a final recommendation on CenterPoint's proposed program changes after it has a chance to review CenterPoint's reply comments.

D. XCEL TRACKER BALANCE AND AFFORDABILITY CREDIT

Xcel's tracker balance as of year-end over the past five years is shown below.

Table 9: Xcel Tracker Balance

	2016	*2017*	*2018*	*2019*	*2020*
Tracker Balance on Dec. 31	$64,710	$658,482	$1,334,120	$1,429,657	$2,227,914

To reduce the ballooning tracker balance, Xcel wants to increase benefits to GAP customers. The (not necessarily mutually exclusive) alternative would be to reduce the $0.00445 per therm GAP surcharge, which costs residential customers about $4 per year.

Specifically, Xcel requests that the Commission approve modifying the affordability credit to limit participants' bills to 3% of household income, from the current 4% level. To implement this change, Xcel proposes to modify the "rate" section of the GAP (Low Income Energy Discount) Rider (Xcel rate book, Section No. 5, Sheet No. 68) as follows:

> The Affordability component consists of a bill credit determined as one-twelfth of the difference between Company's estimate of the Qualified Customer's annual gas bill and ~~4%~~3% of the Qualified Customer's household income as provided by the Qualified Customer to Company.

The Department notes that Xcel would also have to update the "Calculate four percent" in the tariff to "Calculate three percent."

If the Commission approves this tariff change, Xcel states that it "will monitor the impact" in order "to determine if this change is sustainable." Specifically, if "the tracker balance become too low in the future," then Xcel "will assess whether to increase the income threshold to its former level or adjust the surcharge rate in order to be able to keep offering the increased credit amount to participants."

Xcel would implement the change upon receiving a Commission order issuing approval.

On preliminary basis, the Department does not oppose Xcel's proposal. The $4 a year (on average) surcharge is not exorbitant. Since the charge is resulting in excess funds, it may not be unreasonable to use these excess funds to further help those in need. In particular, a lower threshold may be appropriate to help customers that have fallen further behind on payments over the past year due to the pandemic.[5]

However, as with CenterPoint, which is also proposing changes to its program benefits, the Department requests that Xcel provide in reply comments data projecting what the overall change in the cost of the GAP program would be if these changes were made. Specifically, if these changes were made in the previous year, what would the impact on overall spending have been on the current report. Lastly, while the Department understands that Xcel's tariff allows the use of tracker balance funds to increase benefits over the spending cap, the Department requests that Xcel describe in reply comments whether any long-term changes to the cap would be needed if Xcel's proposal is approved.

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[5] While Xcel is not proposing any changes to the arrearage forgiveness component of GAP benefits, increasing eligibility and the affordability credit (by reducing threshold to 3%) will allow more customers to enroll in the program and not get kicked off the program due to nonpayment.

E. MERC TRACKER BALANCE, SPENDING CAP, AND ARREARAGE FORGIVENESS BALANCES

MERC's tracker balance has grown high, reaching $2,280,485 as of the end of 2020. To address this issue, MERC plans to make a proposal in its GAP evaluation report due May 31, 2022. MERC also requests that the Commission allow MERC to temporarily suspend the $750,000 annual spending cap for 2021.

The Department does not oppose MERC's proposals. However, the Department would prefer that MERC be timelier in managing its tracker balance, especially given that MERC's $0.00905 per therm surcharge is on the high side, as shown in Table 1 towards the beginning of these comments.

To help get the process started, the Department requests that MERC provide, in reply comments, some initial thoughts on how to address this issue. For example, MERC could reduce the surcharge, increase program benefits, or both. On the program benefit side, the Department notes that MERC's maximum payment is 6% of household income.

Somewhat relatedly, the Department also requests that MERC further explain the high *negative* arrearage balance per participant, as shown in Table 1 above. For ease of reference, MERC's initial explanation is below:

> …the average arrearage (account balance) includes account balances for those customers who have participated in the Program for more than two years and who successfully eliminated their pre-Program arrears and may have a significant credit balance. Because MERC has had an increasing number of accounts in which the total credit balance exceeds the total arrears balance, the average account balance continues to be a growing negative number (i.e., credit).
>
> … At the end of 2020, the average arrearage balance for customers enrolled in GAP was -$1,050.
>
> … In 2020, MERC continued to not un-enroll any customer as a result of a credit balance. Customers with large credit balances continue to be eligible until they request to be removed. MERC continues to approach customers with credit balances to discuss un-enrollment options. Because these customers have large credit

> balances, they significantly skew the overall GAP participants' average account balance, which is a large credit dollar amount.

In particular, the Department requests that MERC explain how this phenomenon is consistent with the arrearage forgiveness terms as set forth in paragraph 2.2 of MERC's GAP tariff.[6] To the Department's understanding, the arrearage forgiveness payments should end once the customer is no longer in arrears, which would make a negative balance impossible.

F. SELECT STATISTICS AND OTHER PROGRAM INFORMATION FOR GREAT PLAINS

The Commission's May 12, 2008 *Order* in Docket No. G004/M-07-1235 approved the implementation of Great Plains' GAP and required Great Plains to report certain information in its annual GAP reports. The following three sections discuss these initial reporting requirements and contemplate whether these reporting requirements still provide useful, relevant information.

1. Participation Rate Evaluation

Point 2 of the Commission's May 12, 2008 *Order* in Docket No. G004/M-07-1235 requires that Great Plains provide in its annual GAP reports "…an evaluation of the assumed GAP participation rate of five percent in light of actual participation in the Program." The assumed five percent GAP participation figure established in Docket No. G004/M-07-1235 referred to the estimated percentage of LIHEAP customers that would also participate in Great Plains' GAP.[7] As shown in Table 1 of the instant Comments, pursuant to the GAP reporting requirements applicable to all gas utilities with a GAP, Great Plains provides in its annual GAP report the percentage of LIHEAP customers that participate in GAP. In the 2020 program year, 19% of Great Plains' LIHEAP customers participated in the GAP.

The Department concludes that (1) Great Plains reports its actual GAP participation rate as a part of the reporting requirements applicable to all gas utilities with a GAP and (2) comparing the actual GAP participation rate to the five percent participation rate estimated in 2008, prior to the approval of Great Plains' GAP, no longer provides useful insights. The Department recommends that (1) Great Plains continue to report in its annual GAP filings the percentage of LIHEAP customers that participate in GAP, just as the Company has done in prior years, and (2) the Commission discontinue the requirement that Great Plains provide an evaluation

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[6] https://www.minnesotaenergyresources.com/company/tariffs/gasp.pdf.
[7] Page 6 of the Department's March 20, 2008 Comments in Docket No. G004/M-07-1235.
(1,718 LIHEAP customers x 5%) = 86 estimated GAP participants.

comparing the actual GAP participation rate to the estimated five percent participation rate assumed in Docket No. G004/M-07-1235.

2. Cost Evaluation

Point 3 of the Commission's May 12, 2008 *Order* in Docket No. G004/M-07-1235 requires that Great Plains provide in its annual GAP reports "…the actual annual average cost per participant for the Program, and…a discussion concerning any deviation of the actual annual average cost per participant compared to the assumed average annual cost per participant of $555." The $555 average annual cost per GAP participant assumed in Docket No. G004/M-07-1235 was based on Xcel Energy's and Interstate Power and Light Company's estimated per customer annual GAP "benefit" at the time.[8] This $555 average annual cost per GAP participant provided the cost basis from which to estimate the initial budget for Great Plains' GAP.[9] As shown in Table 1 of the instant Comments, pursuant to the GAP reporting requirements applicable to all utilities with a GAP, Great Plains provides in its annual GAP report the actual GAP costs and number of GAP participants for the relevant program year. The average program cost per GAP participant is easily derived from this reported information: In 2020, Great Plains reported actual GAP costs of $52,945 and a total of 224 participants that received GAP benefits at some point during the year, resulting in a per participant GAP cost of approximately $236 for 2020.

The Department concludes that (1) Great Plains reports its actual GAP cost and participant count as a part of the reporting requirements applicable to all gas utilities with a GAP and (2) comparing the actual average annual GAP cost per participant to the $555 assumption estimated in 2008, prior to the approval of Great Plains' GAP, no longer provides useful insights. The Department recommends that (1) Great Plains continue to report in its annual GAP filings the actual annual GAP costs and number of GAP participants, just as the Company has done in prior years, and (2) the Commission discontinue the requirement that Great Plains provide an evaluation comparing the actual average annual GAP cost per participant to the assumed $555.

3. Overall Evaluation

Point 4 of the Commission's May 12, 2008 *Order* in Docket No. G004/M-07-1235 requires that Great Plains provide in its annual GAP reports "…the Company's conclusion regarding the reported evaluation data, together with the Company proposal concerning the GAP on a going forward basis." The Department understands that the "evaluation data" cited in the preceding quote refers to the GAP participation rate and cost reporting requirements outlined in Points 2

[8] Page 8 of Great Plains' February 19, 2008 initial filing in Docket No. G004/M-07-1235.
[9] Page 6 of the Department's March 20, 2008 Comments in Docket No. G004/M-07-1235.
(86 estimated GAP participants x $555 per program costs per participant) = $47,730 estimated annual GAP costs.

and 3 of the Commission's May 12, 2008 *Order* in Docket No. G004/M-07-1235. In its current GAP Report, Great Plains provided a discussion on its annual GAP funding and the GAP application trends for 2020. Great Plains did not request a change to its annual GAP budget or surcharge in its current GAP Report, explaining that the Commission recently approved, in Docket No. G004/M-20-395, Great Plains' request to increase its annual GAP budget to $70,000 and to increase its GAP surcharge to $0.02295 per Dth. Great Plains implemented the increased surcharge of $0.02295 per Dth on December 1, 2020 and expects this higher surcharge to reduce the under-recovered GAP tracker balance over the 2021 program year.[10]

Consistent with our conclusions on the relevance of Great Plains providing comparisons between the actual and previously estimated GAP participation rates and costs, the Department concludes that it no longer provides useful insights for Great Plains to report its conclusions on these comparisons. While the Department recognizes that Great Plains needs to assess its GAP costs and participation in order to make reasonable GAP budget and surcharge proposals, we do not believe that the reporting requirement in Point 4 of the Commission's May 12, 2008 *Order* in Docket No. G004/M-07-1235 is necessary to prompt Great Plains to perform such assessments. Rather, the Department believes that Great Plains' assessment of its GAP costs/participation is inherent to Great Plains' operation of its GAP and any associated proposals to adjust the GAP budget/surcharge. Therefore, the Department recommends that the Commission discontinue the requirement that Great Plains provide conclusions regarding the evaluation data required per Points 2 and 3 of the Commission's May 12, 2008 *Order* in Docket No. G004/M-07-1235.

III. DEPARTMENT CONCLUSIONS AND RECOMMENDATIONS

Each utility noted in its report the impacts of the pandemic on their GAP. In general, there tended to be lower participation in GAP in 2020, which utilities estimated was due to the moratorium on disconnections. It is possible that in the second half of this year, there may be increased interest in GAP, for at least three possible reasons: 1) increased funding and eligibility for LIHEAP; 2) the resuming of disconnections; 3) higher arrearages for some customers. CenterPoint proposes to remove the spending cap on its program, citing uncertainty on GAP enrollment; it also commits to reporting on the topic in March 2022. The Department recommends that each utility make similar reports if they see unusual enrollment trends due to pandemic-related factors.

The Department requests that CenterPoint Energy respond in reply comments to clarify if the CenterPoint has the low use data for LIHEAP and GAP customers, and what those amounts are for the years addressed in Table 8 above.

[10] Page 13 of Great Plains' March 31, 2021 initial filing in Docket No. G004/M-21-217.

The Department also requests that Xcel and CenterPoint provide in reply comments data projecting what the overall change in the cost of the GAP program would be if their proposed GAP program changes were implemented. Specifically, if these changes were made in the previous year, what would the impact on overall spending have been on the current report and, related, whether the changes would necessitate changes in the program spending caps.

In addition, the Department requests that MERC provide, in reply comments, initial thoughts on how to address its large tracker balance, as well as additional information that fully explains the high negative arrearage balance per participant and how this phenomenon is consistent the arrearage forgiveness terms as set forth in paragraph 2.2 of MERC's GAP tariff.

At this time, the Department recommends that the Commission:

- Accept the natural gas utilities' 2020 GAP Reports.

- Approve CenterPoint Energy's request to increase its surcharge rate to $0.00264 per therm from $0.00236 per therm.

- Discontinue the reporting requirement in Point 2 of the Commission's May 12, 2008 *Order* in Docket No. G004/M-07-1235, which stipulates that Great Plains provide in its annual GAP reports "…an evaluation of the assumed GAP participation rate of five percent in light of actual participation in the Program." Note that, per the annual reporting requirements applicable to all utilities with a GAP, Great Plains would continue to report, as it has in prior years, the percentage of LIHEAP customers that participate in GAP.

- Discontinue the reporting requirement in Point 3 of the Commission's May 12, 2008 *Order* in Docket No. G004/M-07-1235, which stipulates that Great Plains provide in its annual GAP reports "…the actual annual average cost per participant for the Program, and…a discussion concerning any deviation of the actual annual average cost per participant compared to the assumed average annual cost per participant of $555." Note that, per the annual reporting requirements applicable to all utilities with a GAP, Great Plains would continue to report, as it has in prior years, the actual annual GAP costs and number of GAP participants.

- Discontinue the reporting requirement in Point 4 of the Commission's May 12, 2008 *Order* in Docket No. G004/M-07-1235, which stipulates that requires that Great Plains provide in its annual GAP reports "…the Company's conclusion regarding the reported evaluation data, together with the Company proposal concerning the GAP on a going

> forward basis." The "evaluation data" cited in the preceding quote refers to the reporting requirements per Points 2 and 3 of the Commission's May 12, 2008 *Order* in Docket No. G004/M-07-1235, which the Department is also recommending that the Commission discontinue.

The Department will provide final recommendations after reviewing companies' reply comments.

/ja

Department Attachment 1: Requirements for 2020 Annual GAP Reports
Docket Nos. G004/M-21-217, G011/M-21-224, G002/M-21-220, G008/M-21-218, and G022/M-21-221

All Utilities	
Summary Schedule	A summary schedule containing the: • Average annual affordability benefit received per customer • Average annual arrearage forgiveness benefit received per customer • Annual program budget • Actual program revenue • Actual program cost for all utilities except GMG • GAP tracker balance as of year-end • GAP rate-affordability surcharge ($/therm) • Disconnection rates for GAP customers, non-GAP LIHEAP customers, and non-LIHEAP residential customers • Percentage of LIHEAP customers that participated in GAP • Number of GAP participants enrolled as of year-end • Number of GAP participants enrolled and receiving benefits at some point during the year
All Utilities, Except GMG	
Payment Frequency	The effect of the GAP on customer payment frequency, including at a minimum a comparison of the payment frequency for customers in GAP to the payment frequency before they were enrolled in GAP, plus a comparison of the payment frequency for GAP participants to the payment frequency for LIHEAP grant recipients. The information reported on customer payment frequency must incorporate partial and late payment information.
Payment Amounts	The effect of the GAP on payment amounts, including at a minimum the average annual and monthly bill credit amount, compared to the average GAP participant's annual and average monthly bill and arrearage amount.
Arrears	The effect of the GAP on the number of customers in arrears, and the effect of GAP on arrearage levels— the latter including at a minimum the change in the arrearage level for the average GAP customer compared to the LIHEAP customers that are not enrolled in the GAP and the average level of arrearage for all of the utility's residential customers.
Retention	The effect of the GAP on retention rates.
Complaints	The effect of the GAP on customer complaints, and data on the type and number of complaints.
Collections	The effect of the GAP on utility collection activity.
Coordination	Information relating to how each utility has coordinated its GAP with other available low-income and conservation resources, naming the agencies the utility has coordinated with, how often the utility has communicated with those agencies during the year, the content of those communications, and what was accomplished in terms of coordination.

CenterPoint Only	
Conservation Measures	The potential no, low, and mid-cost conservation measures that could be implemented in the households of GAP participants, along with CenterPoint's plans to encourage GAP participants to increase their use of these measures.
Customer Eligibility	The number of customers who do not qualify for credits, including zero credit customers.
Other	Do the following in each GAP report: • Provide the costs for each outreach activity associated with increasing LIHEAP and GAP participation and retention. • Provide the monthly number of LIHEAP and GAP customers compared to those numbers in the same months for the previous three years. • Provide the average annual and range (low to high) of LIHEAP and GAP customer natural gas usage levels. • Report on the specific efforts to coordinate participation in LIHEAP, GAP, and CIP programs, including CenterPoint's mapping process to target CIP resources based on natural gas usage and census tract demographic data. • Standardize the method for reporting allowable, incremental and total GAP administrative costs, using the March 31, 2020 report in Docket No. 20-399 as the format, and continue to provide the percentage of program costs represented by administrative costs.
Great Plains Only	
Participation Rate Evaluation	An evaluation of the assumed GAP participation rate of five percent in light of actual participation in the program. (Department recommends discontinuing this reporting requirement)
Cost Evaluation	The actual annual average cost per participant for the program and a discussion concerning any deviation of the actual annual average cost per participant compared to the assumed average annual cost per participant of $555. (Department recommends discontinuing this reporting requirement)
Overall Evaluation	Conclusion regarding the reported evaluation data and proposal concerning the GAP on an ongoing basis. (Department recommends discontinuing this reporting requirement)

CERTIFICATE OF SERVICE

I, Linda Chavez, hereby certify that I have this day served copies of the following document on the attached list of persons by electronic filing, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

MINNESOTA DEPARTMENT OF COMMERCE – COMMENTS

Docket Nos. **G004/M-21-217**
G011/M-21-224
G002/M-21-220
G008/M-21-218
G022/M-21-221

Dated this **4th** day of **June, 2021**.

/s/Linda Chavez
____

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