

December 20, 2023

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

RE: **Response Comments of the Minnesota Department of Commerce,
Division of Energy Resources**
Docket Nos. E002/M-10-854 and E002/M-04-1956

Dear Mr. Seuffert:

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

Petition of Northern States Power Company d/b/a Xcel Energy (Xcel) for Approval of a Modification to its Low-Income Discount Program.

Bridget N. Dockter, Xcel's Policy and Outreach Manager, filed the petition on September 1, 2023.

The Department recommends the Minnesota Public Utilities Commission (Commission) **approve the petition with modifications**. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ LOUISE MILTICH
Assistant Commissioner of Regulatory Analysis

/s/ FELICIA CULLEN
Financial Analyst

/s/ STEPHEN COLLINS
Financial Analyst

LM/FC/SC/ar
Attachment



Before the Minnesota Public Utilities Commission

Response Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket Nos. E002/M-10-854 and E002/M-04-1956

I. INTRODUCTION

On September 1, 2023, Northern States Power Company, doing business as Xcel Energy (Xcel or the Company), filed a petition requesting approval to transfer \$5.6 million from the Medical Affordability Program (MAP) to the PowerOn Program (PowerOn).

On September 13, 2023, the Minnesota Public Utilities Commission (Commission) issued a notice of comment period with the following topics open for comment:

- Should the Commission approve Xcel’s request to transfer \$5.6 million from MAP to PowerOn?
- Will a \$5.6 million transfer leave enough funding in the MAP budget to accommodate current and potential future participants?
- Are there other issues or concerns related to this matter?

On October 25, 2023, Xcel, EnergyCents Coalition (ECC), Minnesota Citizens Utility Board (CUB), and the Minnesota Department of Commerce, Division of Energy Resources (Department) each filed comments. The Department’s comments requested Xcel provide additional information and stated the Department would provide a final recommendation after reviewing Xcel’s reply comments.

On November 15, 2023, Xcel, ECC, and CUB each filed reply comments. Of note, Xcel’s reply comments requested increasing PowerOn funding by \$11 million, in addition to the \$5.6 million transfer.

On December 6, 2023, Xcel filed supplemental reply comments clarifying rate impacts. The supplemental reply comments showed that the \$11 million increase would require increasing the PowerOn surcharges as follows.

Table 1: Xcel’s Proposed PowerOn Surcharge Increase

Customer Class	PowerOn (current)	PowerOn (proposed)	Increase
Residential	\$0.21	\$0.82	\$0.61
C&I Non-Demand	\$0.26	\$0.82	\$0.56
C&I Demand	\$0.66	\$3.56	\$2.90

In addition, Xcel clarified its proposed Low-Income Energy Discount Rider rates, reflecting the instant petition as updated in reply comments, Xcel’s final rates compliance in Docket No. E002/GR-21-630, and Xcel’s Low-Income Low-Energy Usage (LILU) filing in Docket No. E002/M-23-476. The Department summarizes these proposed charges and recaps program details in the table below, which is an updated version of Table 1 from the Department’s initial comments.

Table 2: Overview of Xcel’s Electric Low-Income Programs

	Combined	PowerOn	Discount	MAP	LILU
Beginning Year	1995, 2005, 2018, 2024	1995, 2005	1995	2018	2024 (expected)
Enabling Dockets	varies by program	94-925, 04-1956	94-925, 04-1956	15-826, 17-629	21-630, 23-476
Customer Eligibility	varies by program	<ul style="list-style-type: none"> LIHEAP recipient 	<ul style="list-style-type: none"> LIHEAP recipient 62+ years old and/or disabled 	<ul style="list-style-type: none"> Income ≤60% state median Certified medical circumstances 	<ul style="list-style-type: none"> LIHEAP recipient or income qualified based on other prog. or income ≤50% state median monthly average usage ≤300 kWh
Additional Requirements	varies by program	Comply with payment plan	none	Comply with payment plan	none
Discount Level	varies by program	Limits bill to 3% of household income; Eliminate arrears over up to 24 months with customer copayment	\$15/month	Limits bill to 3% of household income; Eliminate arrears over up to 24 months with customer copayment	35% discount on base energy rate
Customer Enrollment Process	varies by program	Auto-enrolled if also Xcel gas customer; otherwise must apply	Automatically enrolled	Customer must apply	Usage qualified LIHEAP auto-enrolled; other usage qualified must apply
Administration	Xcel + ECC or Xcel only	Xcel + ECC	Xcel	Xcel + ECC	Xcel
Budget Restrictions	varies by program	none	none	First-come/first-served until \$3M budget exhausted.	none
Annual Administrative Costs	\$549,100	not reported	not reported	not reported	to be determined
Existing Surcharge:*		(unchanged since 2013)	(unchanged since 2018)	(unchanged since 2018)	
Residential	\$0.98	\$0.21	\$0.58	\$0.19	n/a
C&I Non-Demand	\$1.27	\$0.26	\$0.78	\$0.23	n/a
C&I Demand	\$3.60	\$0.66	\$2.34	\$0.60	n/a
Proposed Surcharges:**					
Residential	\$2.12	\$0.82	\$0.65	\$0.18	\$0.47
C&I Non-Demand	\$2.12	\$0.82	\$0.65	\$0.18	\$0.47
C&I Demand	\$9.20	\$3.56	\$2.80	\$0.80	\$2.04

* LIHEAP recipients and Lighting customers are exempt from paying the surcharge.

** Xcel 12/6/23 Supplemental Reply Comments (instant docket), Table 2, & 10/17/23 LILU Petition (23-476)

Note: The information above is taken from the Rider’s tariff language, prior dockets, Xcel’s most recent annual report filed on December 1, 2023 in the instant docket, Xcel’s LILU filings in Docket No. E002/M-23-746, and Xcel’s pertinent filings in the instant docket. For tariff information, see Xcel’s Minnesota Electric Rate Book, Section No. 5, 10th Revised Sheet No. 95. It is still the Department’s understanding that the tariff was most recently updated through a 9/11/2023 compliance filing in Docket Nos. E002/M-13-867 & E002/M-21-695. However, the Department expects the tariff to be updated again on January 1, 2024, to reflect Xcel’s implementation of rate adjustments in Docket No. E002/GR-21-630.

While the surcharges in the last three rows of the table above provide a complete picture of Xcel’s overall proposed changes to its electric low-income program funding, the Department notes that the instant petition is limited to Xcel’s request as shown in Table 1.

In addition, the Department notes that on December 1, 2023, Xcel filed its annual report for its electric low-income programs. Based on the information provided in that report and prior reports (see Attachments A, B, and C), and Xcel’s reply comments, the Department provides an updated summary table of program enrollment, costs, and revenues, below.

Table 3: Enrollment, Costs, and Revenues of Xcel’s Electric Low-Income Programs

	Combined	PowerOn*	Discount**	MAP***	LILU****
# Customers Received Benefits					
2019	52,622	17,828	32,756	2,038	n/a
2020	50,772	18,561	30,607	1,604	n/a
2021	50,982	18,550	31,290	1,142	n/a
2022	52,365	19,600	31,692	1,073	n/a
2023 ^a	54,795	23,534	30,240	1,021	87,000 (2024 expected)
Disbursements					
2019	\$17,637,619	\$8,922,455	\$5,617,208	\$3,097,956	n/a
2020	\$15,674,589	\$9,103,797	\$5,067,739	\$1,503,053	n/a
2021	\$16,709,827	\$10,309,309	\$5,491,871	\$908,647	n/a
2022	\$16,133,756	\$9,396,038	\$5,563,246	\$1,174,472	n/a
2023 ^a (annualized ^b)	\$19,107,697	\$12,932,222	\$5,279,081	\$896,395	\$8.3M (2024 expected)
Revenue Annualized^c					
2019	\$18,095,546	\$5,371,117	\$9,678,076	\$3,046,354	n/a
2020	\$18,186,239	\$5,387,832	\$9,736,673	\$3,061,734	n/a
2021	\$22,427,135	\$9,062,981	\$10,163,192	\$3,200,962	n/a
2022	\$17,001,365	\$3,561,787	\$10,220,753	\$3,218,825	n/a
2023 ^a	\$16,315,792	\$2,950,936	\$10,164,631	\$3,200,225	\$8.3M (2024 expected)
Revenue - Disbursements (does not consider ~\$500k admin costs)					
2019	\$457,927	-\$3,551,338	\$4,060,868	-\$51,602	n/a
2020	\$2,511,650	-\$3,715,965	\$4,668,934	\$1,558,681	n/a
2021	\$5,717,308	-\$1,246,328	\$4,671,321	\$2,292,315	n/a
2022	\$867,609	-\$5,834,251	\$4,657,507	\$2,044,353	n/a
2023 ^a	-\$2,791,905	-\$9,981,286	\$4,885,551	\$2,303,830	n/a
Tracker Balance as of 10/31					
2019	\$3,320,606		\$2,324,227	\$996,379	n/a
2020	\$4,913,669		\$2,659,333	\$2,254,336	n/a
2021	\$9,874,531		\$5,390,838	\$4,483,693	n/a
2022	\$10,639,364		\$3,980,012	\$6,659,352	n/a
2023 ^a	\$9,129,478		-\$131,671	\$9,261,149	n/a

* Xcel annual reports, Attachment B

** Xcel annual reports, Attachment A

*** Xcel annual reports, Attachment C

**** Xcel 2023 report, page 12.

^a Does not include LILU.

^b Annualized based on prior year ratios of 10-month to full year data.

^c Annualized using a 12/10 ratio given fixed monthly charges.

The Department's initial comments requested Xcel provide certain information to clarify how its low-income programs are funded. The Department did not offer any final recommendations but made several notes. First, the Department emphasized that the PowerOn and Discount programs are already funded on an aggregate basis. Second, there is no strict requirement for \$3 million to be set aside annually for MAP, especially since MAP's participation levels only require a fraction of that. Therefore, the Department suggested one solution to the depleting PowerOn/Discount tracker balance and ballooning MAP tracker balance was to combine the two trackers. Finally, the Department noted that a temporarily negative tracker balance is not necessarily a problem (tracker balances can be positive or negative), particularly as the tracker appears to have a carrying charge. As such, PowerOn can continue without interruption even if the combined PowerOn and Discount tracker were to temporarily go negative.

Xcel's reply comments continued to request to transfer \$5.6 million from the MAP tracker balance to the PowerOn/Discount tracker balance, as a short-term fix to the funding mismatch. In addition, to address the long-term funding issues, Xcel requested to increase the PowerOn surcharges as shown above, which Xcel initially characterized as a budget increase.¹ Finally, regarding the PowerOn tracker balance, Xcel stated that "[i]f, after two full federal fiscal years of operating the PowerOn Program budget at the new annual budget of \$14.5 million, the Program's tracker balance exceeds \$5.0 million, \$2.0 million will be transferred to the Low Income Discount Program and disbursed evenly to current participants."

ECC and CUB's comments continued to agree with Xcel's proposal, while also providing helpful background information.

II. DEPARTMENT RESPONSE & TOPICS OPEN FOR COMMENT

A. *SHOULD THE COMMISSION APPROVE THE PETITION TO TRANSFER \$5.6 MILLION IN FUNDS FROM MAP TO POWERON? WILL A \$5.6 MILLION TRANSFER IN FUNDS LEAVE ENOUGH FUNDING IN THE MAP BUDGET TO ACCOMMODATE CURRENT AND POTENTIAL FUTURE PARTICIPANTS?*

Xcel's most recent annual report shows MAP participation continuing at about 1,000 customers, MAP revenues continuing to exceed costs by about \$2.3 million, and as a result the MAP tracker balance increasing from \$6,659,352 as of October 31, 2022 to \$9,261,149. The Department therefore concludes that a \$5,600,000 transfer of funds would leave enough funding in the MAP budget to accommodate current and future participants.

In addition, having reviewed parties' reply comments, the Department agrees that transferring \$5.6 million is an acceptable short-term solution to the funding mismatch issue described at length in Xcel's petition and the Department's initial comments. Therefore, all parties agree on this issue.

¹ The Department notes that PowerOn has not had an effective budget for many years, as shown in Xcel's annual electric low-income reports. Instead, PowerOn participation has been unlimited and jointly funded with the PowerOn and Discount surcharges.

However, the Department continues to believe that in both the short and long term, the simplest and most effective solution from a regulatory and administrative perspective is to combine budgets, as contemplated in the Department's initial comments. While parties seemed to object to this proposal in their reply comments, no party described any substantive concerns regarding why combining budgets did not make sense.

To be clear about what "combining budgets" means as outlined in the Department's initial comments, the only program that has an actual budget that limits spending is the MAP program, which was set at \$3 million when the program was approved. By "combining budgets," the Department was referencing Xcel's existing practice of combining tracker recovery for the PowerOn and Discount programs and funding those programs out of a joint tracker. This existing practice has simplified PowerOn and Discount administration and reduced the need for regulatory review. The Department's proposal as outlined in the Department's initial comments would merely extend this beneficial practice to the MAP program. Assuming Xcel's LILU petition in Docket No. E002/M-23-476 is approved, the combining tracker recovery would be extended to this program as well. Each program's disbursements, customer information, and revenues would continue to be tracked as reported in Xcel's annual reports and summarized in Table 3 above. However, the tracker recovery would be combined. As shown in the first column and last six rows of Table 3, when combining Xcel's tracker balances, the apparent lack of funding for PowerOn becomes a non-issue in the short-term. Further, combining the tracker balances would eliminate the need for any future tracker balance transfers in the future.

Given the above, the Department recommends the Commission, as an alternative to Xcel's request to transfer \$5.6 million, instead require Xcel to combine tracker recovery for all programs under Xcel's Low-Income Energy Discount Rider. This combination would remove the need for any transfer now and in the future. The combination would also have no impact on customer enrollment and would reduce regulatory and administrative costs going forward.

B. XCEL'S PROPOSED SURCHARGE INCREASE

The Department reviewed Xcel's proposed rate design as reflected in its proposal (shown in Table 1 above) and confirmed it is consistent with Xcel's updated customer charges as reflected in Xcel's final rates compliance filings in Docket No. E002/GR-21-630² and the existing Low-Income Energy Discount Rider rate design approved in Docket No. E002/M-10-854.³ Based on this consistency, the Department does not have any objections to Xcel's proposed rate design for the purpose of the instant petition.

Regarding the reasonableness of increasing the PowerOn surcharge to generate an additional \$11 million in revenue, the Department also does not object based on the clear need for additional funding in this approximate amount, which appears reasonable based on the Department's review of existing and forecasted Xcel's tracker balances and PowerOn participation trends. Moreover, the additional funding

² See Xcel's filings on November 14, 2023 and December 6, 2023.

³ April 5, 2012 Order in Docket No. E002/M-10-854, page 3.

generated by the surcharge reflects Xcel's PowerOn funding needs as the program has been designed and approved by the Commission. It would be unreasonable not to fund it.⁴

C. XCEL FUTURE TRANSFER PROPOSAL

As noted above, Xcel's reply comments stated that after increasing the PowerOn surcharge, the PowerOn tracker balance exceeds \$5.0 million, Xcel will "transfer" \$2.0 million to the Discount program and disburse the \$2 million evenly to Discount participants.

As a preliminary matter, the Department notes that Xcel's PowerOn and Discount tracker balances are already combined. Further, the Department continues to note that if the Commission adopts the Department's recommendation to combine tracker recovery for all programs, the need to have potential future transfers such as this would be eliminated, simplifying regulatory review and program administration.

Regardless, the Department does not believe any action regarding future transfers or programs changes is warranted. If, in two years, the \$11 million of increased revenue proves to be too much, ratepayers will not be unduly harmed due to the carrying charge in the tracker, and the Commission can then, at that time, decide the appropriate course of action, including whether to reduce the surcharge. In addition, it is not clear to the Department how Xcel would evenly disburse \$2 million, or why \$2 million is a reasonable number. Finally, the Department is not persuaded that this potential transfer would be consistent with Minn. Stat. § 216B.16, subd. 14 requirements for the low-income discount program. For these reasons, the Department recommends the Commission take no action on any future tracker balance transfers.

III. RECOMMENDATION

The Department recommends the Commission approve Xcel's increased surcharge and does not object to Xcel's proposed \$5.6 million tracker-balance transfer as a short-term funding solution. However, the Department believes combining tracker recovery for all of Xcel's Low Income Energy Discount rider programs is a simpler solution both in the short term and long term and therefore recommends consider combining tracker recovery as an alternative.

The Department also recommends the Commission take no action on any future tracker balance transfers. By taking no action, the Commission can then instead make any decision regarding future tracker balance surplus (or deficit) with full knowledge of the facts and circumstances at the time.

⁴ If the Commission were in the future to change any PowerOn program components or if program participation changed, the PowerOn surcharge could be adjusted again accordingly.

CERTIFICATE OF SERVICE

I, Nicole Westling, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, 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
Response Comments**

Docket Nos. E002/M-10-854 and E002/M-04-1956

Dated this **20th** day of **December 2023**

/s/Nicole Westling

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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_10-854_Official
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