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March 29, 2019

Mr. Dan Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 East Seventh Place, Suite 350  
St. Paul, MN 55101-2147

**RE: *Petition for Approval of Great Plains Natural Gas Co. Annual Gas Affordability Program Report, Docket No. G004/M-19-\_\_\_\_\_***

Dear Mr. Wolf:

Great Plains Natural Gas Co. (Great Plains), a Division of Montana-Dakota Utilities Co., herewith electronically files its Calendar Year 2018 Gas Affordability Program (GAP) Report in compliance with the Minnesota Public Utilities Commission's Order issued in Docket No. G-004/M-18-248.

If you have any questions regarding this filing, please contact me at (701) 222-7856, or Brian Meloy at (612) 335-1451.

Sincerely,

*/s/ Tamie Aberle*

Tamie A. Aberle  
Director of Regulatory Affairs

STATE OF MINNESOTA  
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Dan Lipschultz	Acting Chair
Matt Schuerger	Commissioner
John Tuma	Commissioner
Katie Sieben	Commissioner

In the Matter of the Petition of Great	)	
Plains Natural Gas Co.'s Gas for	)	Docket No. G004/M-19-_____
Approval of the 2018 Gas Affordability	)	
Program Report	)	
	)	

**SUMMARY OF FILING**

Great Plains Natural Gas Co., (Great Plains) a Division of Montana-Dakota Utilities Co. submits this Petition for approval of the 2018 Gas Affordability Program (GAP) Report in compliance with Minnesota Statute § 216B.16, Subd. 15 and Orders issued by the Minnesota Public Utilities Commissions in Docket Nos. G-004/M-07-1235, G-004/M-15-306, G-004/M-16-275, G-004/M-17-254 and G-004/M-18-248. Great Plains respectfully requests that the Commission accept its 2018 Gas Affordability Program Report as being in compliance with its directives.

STATE OF MINNESOTA  
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Dan Lipschultz	Acting Chair
Matt Schuerger	Commissioner
John Tuma	Commissioner
Katie Sieben	Commissioner

In the Matter of the Petition of Great Plains Natural Gas Co.'s Gas for Approval of the 2018 Gas Affordability Program Report )  
)  
) Docket No. G004/M-19-\_\_\_\_\_  
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)

**PETITION FOR APPROVAL OF GREAT PLAINS NATURAL GAS CO.'S GAS AFFORDABILITY PROGRAM REPORT FOR PROGRAM YEAR 2018**

**I. INTRODUCTION AND SUMMARY**

Great Plains Natural Gas Co. (Great Plains) a Division of Montana-Dakota Utilities Co. hereby submits this Petition to the Minnesota Public Utilities Commission (Commission) for approval of Great Plains' Gas Affordability Program Report for calendar year 2018 pursuant to Minnesota Statute § 216B.16, Subd. 15 and Orders issued by the Commissions in Docket Nos. G-004/M-07-1235, G-004/M-15-306, G-004/M-16-275, G-004/M-17-254 and G-004/M-18-248.

**II. BACKGROUND**

Great Plains' Gas Affordability Program (GAP) was approved by the Commission in Docket No. G004/M-07-1235 by Order issued on May 12, 2008 and Order issued on September 29, 2015 in Docket No. G-004/M-15-306 extending GAP through program year 2016. In Docket No. G-004/M-16-275 the Commission Ordered Great Plains to continue to file a compliance report by March 31 of each year, and program evaluations periodically.

On June 1, 2016 Great Plains filed its Gas Affordability Program Evaluation Report, Docket No. G-004/M-16-495. On July 27, 2016, the Commission issued its *Order Extending Expiration Date of Gas Affordability Programs* extending the termination date of Great Plains' GAP to June 30, 2017. On May 22, 2017, The Commission issued an Order in Docket No. G-004/M-16-495. In this docket the Commission Ordered Great Plains to start reporting its GAP performance based on one-hundred percent of the customers enrolled in both LIHEAP and GAP and one-hundred percent of the customers only enrolled in LIHEAP<sup>1</sup>. The Commission also approved Great Plains request to reinstate a GAP surcharge at the Company's requested level of \$0.01393 per dekatherm effective with service rendered on June 1, 2017 and determined that Great Plains' GAP program should continue with no expiration date, Docket No. G-004/M-16-495, May 22, 2017 Order. On June 20, 2018, Great Plains' 2017 GAP report was approved by the Commission in Docket No. G-004/M-18-248.

In Docket No. G-004/M-16-495 the Commission required Great Plains, Xcel Energy, CenterPoint Energy, the Department and others that offer a GAP to participate in a stakeholder work group to discuss if changes should be made to the GAP programs. Utilities, third party administrators and the Department convened to discuss and make recommendations regarding GAP. On May 22, 2018 the stakeholder report was filed with the Commission. The utilities did not suggest changes to the GAP, however proposed the use of a streamlined format for annual reporting using a form developed by the Department. On September 28, 2018 the Commission issued an Order accepting the Utilities Stakeholder

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<sup>1</sup> Great Plains was previously reporting several GAP metrics based on a sample of customers enrolled in LIHEAP and/or GAP as applicable pursuant to the Commission's Order issued in Docket No. G-004/M-07-1235.

report as filed and adopting the use of a streamlined reporting format for annual reports using the form developed by the Department.

Great Plains' GAP is available to those customers who (1) have been qualified and receive assistance from the Low-Income Home Energy Assistance Program (LIHEAP); (2) agree to be placed on a levelized payment plan; and (3) agree to a reasonable payment schedule. The GAP is designed to assist qualified low-income residential customers manage and pay their natural gas bills through the establishment of a new affordability bill credit and arrearage forgiveness in certain circumstances.

Great Plains' Affordability Component consists of a bill credit available to Qualified Customers to help offset the costs of natural gas service. The bill credit is equal to one-twelfth of the difference between Great Plains' estimate of the Qualified Customer's annual gas bill and 4 percent of the Qualified Customer's household income as provided by the Qualified Customer to Great Plains.<sup>2</sup>

The Arrearage Forgiveness Component of Great Plains' GAP consists of a monthly credit that is applied each month after receipt of the Qualified Customer's payment. The credit is designed to retire arrears over a period of up to twenty-four months, with Great Plains matching the Qualifying Customer's contribution to retiring arrears.

Through Program Year 2010, Great Plains administered its own GAP, while working actively with community action partnership agencies. This required Great Plains to review current billing and consumption information, approved LIHEAP benefits and household income information submitted to Great Plains to determine a Qualified Customer's payment

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<sup>2</sup> Pursuant to the Commission's Order issued in G-004/M-10-322 on September 30, 2010, Great Plains was authorized to lower the income threshold to qualify for the Affordability Component to 4 percent. Effective with applications received for Program Year 2011, the 4 percent income threshold was utilized to determine if a customer qualifies for the Affordability Component.

schedule amount.<sup>3</sup> Effective with Program Year 2011, Great Plains entered into an agreement with West Central MN Communities Action, Inc. (West Central) to serve as the third-party administrator of its GAP. The Commission approved West Central as the third-party administrator of Great Plains' GAP by Order dated March 30, 2011. In November 2014, Great Plains' signed an agreement with The Salvation Army, Roseville, Minnesota to administer Great Plains' GAP. Great Plains advised the Commission of this change in its compliance filing submitted on January 16, 2015 in Docket No. G-004/M-07-1235.

**III. GENERAL FILING INFORMATION**

Pursuant to Minn. Rules Part 7825.1300, Subpart 3, Great Plains provides the following general information:

Utility:	Great Plains Natural Gas Co. A Division of Montana-Dakota Utilities Co.
Company's Attorney:	Brian M. Meloy Stinson Leonard Street 50 South Sixth Street, Suite 2600 Minneapolis, MN 55402-1540 Telephone: 612-335-1451
Date of Filing	March 29, 2019
Proposed Effective Date	May 29, 2019

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<sup>3</sup> A Qualified Customer's payment schedule includes both payment of the customer's current month's bill (which reflects one-twelfth the levelized payment plan), after inclusion of the affordability bill credit, and payment of a portion of the Qualified Customers pre-program arrears.

Controlling Statute for Time in Processing the Filing	NA
Utility personnel authorizing the filing and to whom copies of correspondence, pleadings and notices should be sent	Tamie A. Aberle Director of Regulatory Affairs Great Plains Natural Gas Co. 400 North 4 <sup>th</sup> Street Bismarck, ND 58501

**IV. DESCRIPTION OF FILING**

**A. Petitioner**

Great Plains is a Minnesota public utility as defined in Minn. Stat. § 216B.02, Subd. 4 and operates as a Division of Montana-Dakota Utilities Co. Great Plains is engaged in business as a natural gas local distribution company serving 18 communities in Minnesota and one community in North Dakota. Great Plains currently provides natural gas utility service to approximately 21,961 Minnesota customers and 2,295 customers in North Dakota.

In compliance with the Commission’s directives, Great Plains provides its Calendar Year 2018 Gas Affordability Program Report covering the period January 1, 2018 through December 31, 2018. The streamlined reporting format approved in the Commission’s September 28, 2018 Order Docket No. G-004/M-16-495 is provided as Attachment A.

**V. 2018 ANNUAL GAP REPORT**

Please see Attachment A for the following information for reporting years 2016-2018. The line numbers referenced in each section refer to Attachment A.

### **1. Program Dates and Status (Lines 1-9)**

Great Plains' GAP is approved on a permanent basis and continues to be administered by The Salvation Army in Roseville, MN. Great Plains will be filing its Evaluation Report for GAP by May 31, 2019.

### **2. Participant Benefits (Lines 10-17)**

As noted previously, the maximum payment as a percentage of household income is set to 4% and the repayment period for the arrearage forgiveness program is set at twenty-four months. The average annual income per GAP participant was \$13,900 in 2018, the average annual bill was \$642. The average arrearage balance per participant was \$138, the average affordability benefit was \$171 and the average annual arrearage forgiveness benefit per customer was \$56. The average total benefit per participant was \$159.

The annual bill per participant for gas service increased 28% in 2018 to \$642 compared to \$500 in 2017. This was driven by the increase in the cost of gas.

GAP customers average annual affordability benefit, arrearage forgiveness and average total benefit increased in program year 2018 from the average benefit received in 2017 by 54%, 75% and 71% respectively.

### **3. Cost and Recovery (Lines 18-23)**

Great Plains annual budget for GAP is \$50,000. Revenue collected from January through December 2018 for GAP funding at \$0.01393 per dekatherm was \$40,998.33. Great Plains also received a \$10,000 donation from Otter Tail Power Co. (Otter Tail). This donation was the result of Otter Tail's requirement in Docket No. E017/M-17-257 to deposit \$10,000 into an account devoted to funding a low-income program. Otter Tail Power chose Great Plains GAP Program to assist its gas customers with funding for the GAP program to meet this requirement. Great Plains dispersed \$37,778.85 for affordability and arrears



credits and paid the third-party administrative fee of \$2,750. The tracker balance as of year-end 2018, including the contribution from Otter Tail Power Co., is \$27,373.75. The annual cost of the surcharge for an average residential customer who uses 90 dekatherms of gas per year increased from \$0.73 in 2017 to \$1.25 in 2018. Great Plains is proposing to return the current GAP surcharge.

#### **4. Participation (Lines 24-28)**

In calendar year 2018, Great Plains received 408 GAP applications representing an increase of 23 percent from calendar year 2017, while LIHEAP applications submitted in 2018 for Great Plains' customers increased 5 percent from the number of LIHEAP applications received in 2017. Of the 408 applications received, 238 customers were ultimately enrolled in GAP qualifying for an affordability credit and/or arrearage forgiveness credit. In GAP program year 2018 Great Plains considered all LIHEAP or other assistance funds as customer payments.

This change allowed:

- 1) More applicants to qualify for the program and not be removed from the program for not making each monthly payment or missing two monthly payments in a row because of the credit balance typically carried once the LIHEAP payment is applied.
- 2) It also allowed more customers to qualify for the arrear's forgiveness when previously their LIHEAP funds may have paid their arrears balance owing at the time of application and therefore disqualifying customer for that portion of the program.

As shown on Attachment A, Line 24 the number of LIHEAP customers that participated in GAP in 2018 increased significantly from 3.97% in 2017 to 17.92%. Great Plains retained customers in GAP in 2018 at a percentage of 71%, compared to 65% in 2017. Great Plains did not have a waiting list to participant in GAP during program year 2018.

Factors contributing to the number of applicants not qualifying for GAP in 2018 include:

- 1) Either denied LIHEAP or LIHEAP application was never submitted by the customer.
- 2) Customers applying for program but not qualifying for an arrear's forgiveness or affordability credit.

Qualifying applicants not eligible for the affordability credit or the arrearage forgiveness credit were offered the option to enter a levelized payment plan. In 2018, Great Plains continued the process of contacting customers that received LIHEAP benefits effective October 1, 2017 and were identified as being in arrears to encourage them to apply for GAP. Throughout the year, Great Plains also re-evaluated customers that had previously submitted a 2018 GAP application, however did not qualify for the arrears benefits at the time of application. Those customers were contacted and advised that they could qualify for the arrears credit and were eligible to enroll in the program.

#### **5. Impact on Disconnect Rates (Lines 29-33)**

Customers participating in GAP in 2018 experienced a lower rate of disconnections compared to GAP participants in 2017 and approximately the same as GAP participants in 2016. This is notable because as previously stated, customers' annual average bills increased 28% from their annual bill in 2017 and 8% from their annual bill in 2016. The Non-GAP and the Non-GAP/Non-LIHEAP group disconnection rates increased in 2018 compared to both 2016 and 2017. The pre-program baseline comparison reflects the GAP participations disconnection rates while enrolled in GAP as compared to that same customer group's disconnection rate in the prior year (pre-GAP). This statistic includes several variables that do not necessary capture the benefits or GAP. However, the GAP had a positive impact based on the comparison of GAP participants to NON-GAP/LIHEAP customers each year.

**6. Impact on Payment Frequency-Dollars Paid Divided by Dollars Requested (Lines 34-38).**

GAP participants paid a larger percentage of the dollars requested as compared to the Non-GAP/LIHEAP customer group. As expected the Non-GAP/Non-LIHEAP Residential customers paid the greatest percentage of dollars requested. When evaluating the 2018 GAP participants' dollars paid to dollars requested before they were enrolled in GAP shows a significant difference when enrolled in GAP.

**7. Number of Payments Made Divided by the Number of Payments Requested (Lines 39-43).**

GAP participants made a higher percentage of the payments requested as compared to the Non-GAP/LIHEAP group. Again as expected the Non-GAP/ Non-LIHEAP Residential group made the highest percentage of payments requested of the three groups. Enrolling in GAP also shows that when customers are enrolled in the program they make a higher percentage of payments requested than those in LIHEAP but not participating in GAP.

**8. Impact on Arrears (Lines 44-48)**

GAP participants had a lower number of accounts with an arrears balance (20%) as compared to the Non-GAP LIHEAP group at (23%). While Non-GAP/Non-LIHEAP customers had the lowest percentage of accounts in arrears. When comparing the average debt amount of each group in arrears, GAP participants average arrears balance was \$138.37 with the Non-GAP LIHEAP group significantly higher at \$305.56, as compared to Non-GAP/Non-LIHEAP Residential customers average arrears balance owing of \$123.08. Forty-eight percent of the 2018 GAP participants coming into the program had an arrears balance, compared with twenty percent at year end.

### **9. Dollar Amount of Arrears % Change (Lines 49-53)**

Each group did experience an increase in the average dollar amount of arrears balance owing. The increase may be attributable to the increase in the cost of gas in 2018 from 2017 and the higher average bill per participant due to price and weather. Lines 52-53 show that GAP participants had an average arrears balance of \$212.77 prior to their enrollment in GAP and \$138.37 at the end of December 2018.

### **10. Type and number of customer complaints (Lines 54-55)**

Great Plains did not receive a customer complaint regarding the GAP program in 2018.

### **11. Retention (Line 56)**

Great Plains retention rate for GAP participants in program year 2018 was 71%. This can be attributed to the program change made in 2018 that considered LIHEAP payments as customer payments.

### **12. Impact on collection activity (Lines 57)**

As demonstrated in prior program years and the current program year Great Plains' customers that participate in GAP have a lower than average arrears balance owing, lower rate of disconnections than Non-GAP/LIHEAP customers, which has a positive impact on collection activity by reducing the need for such activities. Great Plains' consumer specialist works daily with Great Plains credit representatives to identify Great Plains customers whose accounts are in a collection status, who qualified for LIHEAP in the current heating season and who currently are not enrolled in the current years GAP. Great Plains reaches out to this group of customers to promote and educate customers to advise about the program and how to apply.

### **13. Coordination with other programs (Line 58)**

Great Plains coordinates and communicates with all agencies providing bill payment assistance in our service territory. The goal is to provide all necessary material and training to agencies, so they are knowledgeable and willing to promote GAP to all Great Plains customers, resulting in more GAP participants. Great Plains has established a good working relationship with other agencies in Great Plains service territory which was again evident as case workers for all assistance agencies did contact Great Plains to advise that they had discuss GAP with customers specifically those applying for crisis assistance as well as apply for heating assistance.

Great Plains outreach efforts include: Direct mailing to all customers that received heating assistance in previous heating season, posting of application on Great Plains and third-party administrator websites, billing inserts to customers advising of GAP. Inserts are included with monthly bills throughout the winter season, providing information regarding where to apply and contact information for questions. Information and applications forms were also provided to all energy assistance agencies in Great Plains' service territory and Great Plains has adopted the practice to discuss GAP with customers that apply for the Cold Weather Rule protection.

### **VI. Overall Evaluation**

In Docket No. G-004/M-16-495 Great Plains requested and received approval to reinstate the surcharge of 0.01393 per dekatherm collected from all firm customers effective with service rendered June 1, 2017 to fund GAP. Great Plains will re-evaluate this surcharge in the Evaluation Report which is due by May 31, 2019. As expected, the changes made to Great Plains 2018 GAP program contributed to the increase in qualified participants from 57 in 2017 to 238 participants in 2018.

## **VI. The Proposal**

Great Plains respectfully requests that the Commission accept its 2018 Calendar Year Gas Affordability Program Report as being in compliance with its May 12, 2008, November 18, 2009, September 22, 2010, December 29, 2011, October 5, 2012, September 25, 2013, November 26, 2014, July 25, 2016 and October 12, 2017, Orders issued in Docket Nos. G-004/M-07-1235, G-004/M-15-306 and G004/M-16-275, G004/M-16-495, G004M-17-254 and G-004/M-18-248. No change in the surcharge rate is proposed at this time.

**Dated: March 29, 2019**

**Respectfully Submitted,**

*/s/ Tamie Aberle*

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Tamie Aberle  
Director of Regulatory Affairs  
Great Plains Natural Gas Co.  
a Division of Montana-Dakota Utilities Co.  
400 N. 4<sup>th</sup> Street  
Bismarck, ND 58501

**Attachment A**

# **Attachment A**

GREAT PLAINS NATURAL GAS CO.  
GAS AFFORDABILITY REPORTING 2018

Information as required and approved in September 28, 2018 Order-Docket No. G-004/M-16-495

Section Lines

1		2016	2017	2018
Program Dates and Status:				
1	Date program started	1/1/2016	1/1/2017	1/1/2018
2	Program effective date	1/1/2016	1/1/2017	1/1/2018
3	Date next evaluation report due	5/31/2019	5/31/2019	5/31/2019
4	Date last evaluation completed	6/1/2016	6/1/2016	6/1/2016
5	Last evaluation docket number	G-004/M-16-495	G-004/M-16-495	G-004/M-16-495
6	Status of program (pilot or permanent)	Pilot	Pilot	Permanent
7	Date pilot program ends, if applicable		5/22/2017	N/A
8	Date of last Evaluation Order	11/26/2014	5/22/2017	5/22/2017
9	Program administrator	The Salvation Army	The Salvation Army	The Salvation Army
2		2016	2017	2018
Participant benefits				
10	Description of affordability benefit - maximum payment as % of household income	4%	4%	4%
11	Description of arrearage forgiveness benefit - repayment period	Up to 24 Months	Up to 24 Months	Up to 24 Months
12	Average annual income per participant	\$10,761	\$14,599	\$13,900
13	Average annual bill per participant	\$595	\$500	\$642
14	Average arrearage balance per participant	\$165	\$103	\$138
15	Average annual affordability benefit per participant	\$99	\$111	\$171
16	Average annual arrearage forgiveness benefit per customer	\$32	\$32	\$56
17	Average total benefit per participant	\$95	\$93	\$159
3		2016	2017	2018
Cost and Cost Recovery				
18	Annual budget	\$50,000.00	\$50,000.00	\$50,000.00
19	Actual revenue 2018 see explanation at page 7 of report.	\$0.00	\$10,353.77	\$50,998.33
20	Annual cost	\$7,298.67	\$8,027.23	\$40,528.85
21	Surcharge (\$/decatherm)	\$0.00000	\$0.01393	\$0.01393
22	Annual cost of surcharge for average residential customer who uses 900 therms (90 decatherms) of gas per year. Surcharge effective 6/1/2017.	\$0.00	\$0.73	\$1.25
23	Tracker balance as of year-end.	\$14,577.73	\$16,904.27	\$27,373.75
4		2016	2017	2018
Participation				
24	% of LIHEAP customers that participated in GAP	3%	4%	18%
25	Number of participants enrolled as of year-end	28	37	170
26	Number of participants enrolled and receiving benefits at some time during the year	48	57	238
27	Whether a waiting list occurred at any time during the year	No	No	No
28	If so, the number of customers on the waiting list and for how long	N/A	N/A	N/A



**GREAT PLAINS NATURAL GAS CO.  
GAS AFFORDABILITY REPORTING 2018**

Information as required and approved in September 28, 2018 Order-Docket No. G-004/M-16-495

5	<b>Impact on disconnect rates</b>	2016	2017	2018
	Disconnection rates - non GAP LIHEAP baseline			
29	GAP participants	4%	5%	4%
30	Non-GAP LIHEAP customers	11%	12%	14%
31	Non-LIHEAP residential customers	3%	3%	4%
	Disconnection rates - pre-program baseline	2016	2017	2018
32	GAP participant cohort	4%	5%	4%
33	GAP participants cohort before they were enrolled in GAP	6%	0%	1%
6	<b>Impact on payment frequency</b>	2016	2017	2018
	Dollars paid ÷ by dollars requested			
	Non-GAP LIHEAP Baseline			
34	GAP participants	Not Available 1/	Not Available 1/	56%
35	Non-GAP LIHEAP customers	Not Available 1/	Not Available 1/	30%
36	Non-LIHEAP residential customers	Not Available 1/	Not Available 1/	94%
	Pre-Program Baseline	2016	2017	2018
37	GAP participants cohort	Not Available 1/	Not Available 1/	56%
38	GAP participant cohort before they were enrolled in GAP	Not Available 1/	Not Available 1/	40%
7	<b>Number of payment made ÷ number of payments requested</b>			
	Non-GAP LIHEAP baseline	2016	2017	2018
39	GAP participants	70%	76%	52%
40	Non-GAP LIHEAP customers	37%	44%	43%
41	Non-LIHEAP residential customers	Not Available 1/	Not Available 1/	86%
	Pre-Program Baseline			
42	GAP participants cohort	70%	76%	52%
43	GAP participant cohort before they were enrolled in GAP	68%	43%	41%
8	<b>Impact on arrears</b>			
	% Customers in arrears			
	Non-GAP baseline	2016	2017	2018
44	GAP participants	10%	26%	20%
45	Non-GAP LIHEAP customers	22%	22%	23%
46	Non-LIHEAP residential customers	15%	14%	15%
	Pre-Program baseline	2016	2017	2018
47	GAP participant cohort	10%	26%	20%
48	GAP participant cohort before they were enrolled in GAP	38%	30%	48%

**GREAT PLAINS NATURAL GAS CO.  
GAS AFFORDABILITY REPORTING 2018**

Information as required and approved in September 28, 2018 Order-Docket No. G-004/M-16-495

9	Dollar amount of arrears			
	%Change in dollar amount of arrears (non-GAP LIHEAP baseline)	2016	2017	2018
49	GAP participants	-62%	-23%	35%
50	Non-GAP LIHEAP customers	-49%	-12%	155%
51	Non-LIHEAP residential customers	-6%	18%	34%
	Dollar amount of arrears (pre-program baseline)	2016	2017	2018
52	GAP participants cohort	133.41	\$102.58	\$138.37
53	GAP participant cohort before they were enrolled in GAP	112.78	\$310.00	\$212.77
10	Complaints	2016	2017	2018
54	Number of complaints	0	0	0
55	Nature of complaints	N/A	N/A	N/A
11	Retention	2016	2017	2018
56	GAP participant retention rate	58%	65%	71%
12	Impact on collection activity	2016	2017	2018
57	Brief description of effect of GAP on collection activity	Reduced collections by increasing pymts	Reduced collections by increasing pymts	Reduced collections by increasing pymts
13	Coordination with other programs	2016	2017	2018
58	Page(s) of report where coordination efforts described	Report filed March 31, 2017 pages 13-15 and 17	Report filed on April 2, 2018, Attachment A, page 10	Report filed on March 29, 2019, Attachment A, page 11.

1/ Fields identified above as not available in years 2016-2017. Analysis in prior reporting was not completed for the complete groups, and the data was based on a sample size in these years. The 2018 data is based on the total customers in each group GAP, Non-GAP/LIHEAP, and Non-GAP/Non-LIHEAP.