MINNESOTA DEPARTMENT OF COMMERCE

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May 2, 2016

Daniel P. Wolf
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. G008/M-16-266, G002/M-16-272, G011/M-16-273, G004/M-16-275

Dear Mr. Wolf:

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

Minnesota Natural Gas Utilities' 2015 Gas Affordability Program (GAP) Annual Reports.

Greater Minnesota Gas' GAP Annual Report was discussed in separate comments in Docket No. G022/M-16-233.

The annual reports were filed on March 31, 2016 by:

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The Department recommends **acceptance** of the GAP reports for CenterPoint Energy, Xcel Energy, Minnesota Energy Resources Corporation, and Great Plains Natural Gas, and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ SUSAN MEDHAUG
Supervisor, Energy Regulation & Planning

SM/lt
Attachment

MINNESOTA DEPARTMENT OF COMMERCE

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE MINNESOTA DEPARTMENT OF COMMERCE DIVISION OF ENERGY RESOURCES

DOCKET NOS. G008/M-16-266, G002/M-16-272, G011/M-16-273, G004/M-16-275

I. BACKGROUND AND SUMMARY

Minnesota Stat. §216B.16, Subd. 15 requires public utilities serving low-income residential ratepayers who use natural gas for heating to file an affordability program with the Minnesota Public Utilities Commission (Commission). Low-income residential ratepayers are defined by the statute as ratepayers receiving energy assistance from the Low-Income Home Energy Assistance Program (LIHEAP). The statute requires that any affordability program must:

1) Lower the percentage of income that participating low-income households devote to energy bills;
2) Increase participating customer payments over time by increasing the frequency of payments;
3) Decrease or eliminate participating customer arrears;
4) Lower the utility costs associated with customer account collection activities; and
5) Coordinate the program with other available low-income bill payment assistance and conservation resources.

In a series of Orders in each respective docket,[1] the Commission required utilities to report the following information in their annual reports:

[1] See *Order Accepting Compliance Filings Regarding Gas Affordability Program and Requiring Further Action*, November 18, 2009, and *Order Accepting Gas Affordability Program Reports, Deferring Action on Another, and Requiring Further Action*, September 22, 2010 in Docket Nos. G004/M-07-1235, G007,011/M-07-1131, G008/GR-05-1380, G001/M-07-1295, G002/GR-06-1429, and G022/CI-08-1175.

- Customer payment frequency (including partial and late payment information);
- Disconnections;
- Payment amounts;
- Customer Payment history;
- Arrearage levels;
- Coordination with other available low-income payment assistance and conservation resources; and
- Customer complaints.

In its December 29, 2011 Order[2] the Commission required all natural gas utilities to:

- Implement an application processing goal;
- Assess periodically whether the use of their third-party administrator is the most effective and efficient arrangement;
- Require the third-party administrator to make the Gas Affordability Program (GAP) application available on their website;
- Provide reminders to GAP participants when payments are missed, and;
- Cross-promote GAP with other programs.

Additionally, in an Order[3] dated September 25, 2013, the Commission required utilities to file a summary schedule that includes the following information:

- average annual affordability benefit received per customer;
- average annual arrearage forgiveness benefit received per customer;
- percentage of LIHEAP customers that participated in GAP;
- disconnection rates for (a) GAP customers, (b) LIHEAP-non-GAP customers, and (c) non-LIHEAP customers (all firm customers including Commercial and Industrial C&I);
- number of GAP participants enrolled as of year-end;
- number of GAP participants enrolled and receiving benefits at some time during the year;
- annual program budget;
- actual program revenue;
- actual program cost;
- GAP tracker balance as of year-end; and
- GAP rate-affordability surcharge ($/therm).

This information is compiled in Appendix A.

Finally, in an Order[4] dated September 19, 2015, the Commission required each utility to include in its Annual Compliance Report an explanation of why it does not assess the GAP

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[2] See *Order Accepting Gas Affordability Program Reports and Requiring Further Action*, December 29, 2011 in Docket Nos. G004/M-07-1235, G007,011/M-07-1131, G008/GR-05-1380, G001/M-07-1295, G002/GR-06-1429, and G022/CI-08-1175.
[3] *Order Accepting Gas Affordability Program Reports*, September 25, 2013 in Docket Nos. G004/M-07-1235, G007,011/M-07-1131, G008/GR-05-1380, G001/M-07-1295, G002/GR-06-1429, and G022/CI-08-1175.

surcharge against Interruptible Sales and Transportation Customers, a proposal evaluating cost allocation methods for its GAP program, and the recalculated surcharge for various alternatives if Interruptible Sales and Transportation Customers were included.

The following utilities submitted their GAP 2015 annual reports in the following dockets:

- CenterPoint Energy (CenterPoint) in Docket No. G008/M-16-266;
- Xcel Energy (Xcel) in Docket No. G002/M-16-272;
- Minnesota Energy Resources Corporation (MERC) in Docket No. G011/M-16-273; and
- Great Plains Natural Gas Company (Great Plains) in Docket No. G004/M-16-275.

II. DEPARTMENT ANALYSIS

The Department reviewed the GAP reports for each utility for the information required by the various Commission Orders cited above. The Department concludes that Xcel, Great Plains, MERC and CenterPoint have submitted the information required by the Commission Orders. Attachment A to these comments provides a summary of the schedules submitted in response to the Commission's September 25, 2013 Order.

Each utility's GAP program is authorized to continue through the following year-ends:

- CenterPoint – 2016
- Xcel – 2016
- MERC – 2019
- Great Plains – 2016

Prior to reauthorization each utility is required to submit a multi-year evaluation, including a financial evaluation of the Program. The Department will submit comments on each of the evaluation filings after the evaluation has been submitted. The evaluations will include each utility's discussion on how its GAP achieved the goals set forth in Minn. Stat. §216B.16, subd. 15, and each utility's financial evaluation of the Program, as required by tariff. The Department believes that use of the multi-year data included in the evaluations, rather than the single-year data provided in the annual GAP reports, provides a better perspective for identifying successes and areas needing improvement in the GAPs.

In addition to the general reporting requirements required of all utilities, Great Plains, CenterPoint and Xcel have individual reporting requirements established by the Commission at the time of its approval of the utility's GAP program. The Department offers the following comments on each utility's programs and on any individual requirements, as well as an assessment of the utilities' responses regarding assessing charges to Interruptible Sales and Transportation Customers.

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[4] Docket Nos. G008/M-15-307, G002/M-15-314, G011/M-15-308, G004/M-15-306, G001/M-15-309 and G022/M-15-315

A. CENTERPOINT ENERGY

In its November 22, 2010 *Order Evaluating Gas Affordability Program, Extending and Modifying Pilot Program, Authorizing Cost Recovery and Requiring Future Reporting* in Docket No. E008/GR-05-1380, the Commission required that:

- CenterPoint shall, in future reporting, report 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;
- CenterPoint shall use actual disconnection and reconnection rates to estimate disconnection and reconnection costs for the remainder of the pilot period, not disconnection rates from 2009; and
- CenterPoint shall report data on the number of people who do not qualify for credits, including zero-credit customers.

CenterPoint listed conservation measures available to GAP participants as including installing a programmable thermostat, lowering the water heater setting; adjusting window treatments according to season and time of day; installing a low-flow showerhead and faucet aerator; and weather-stripping. In addition, the Company made a number of conservation measures available to qualifying low-income customers at no cost including a home energy audit, weatherization, water heater replacement, and furnace and boiler heater tune-up or replacement. CenterPoint included a list of outreach activities including direct mail and email campaigns as well as organizations with which it engages.

For 2015, CenterPoint reported a 4 percent disconnect rate for GAP customers, compared with 10.2 percent for LIHEAP non-GAP customers, and 3.8 percent for all firm customers. Finally, CenterPoint reported that 2,071 customers applied for GAP, but were not enrolled because their incomes and usage made them ineligible for affordability or arrearage credits.

The Department concludes that CenterPoint has provided the information required by the Commission.

B. XCEL ENERGY

In its October 26, 2012 *Order Accepting Gas Affordability Program Evaluation and Requiring Program to Continue as Modified* in Docket No. E002/GR-06-1429, the Commission required Xcel to reduce its gas affordability program surcharge rate for four years to a level that will reduce its GAP tracker balance by approximately $1 million and that will also allow for an increase in outreach and participation levels.

The Commission directed Xcel to reduce its gas affordability program surcharge rate from $0.00445 to $0.00400 per therm beginning January 1, 2013. Xcel forecasted a reduction of $264,000 in the tracker balance for 2015, but the tracker balance was reduced by $958,876 due to increasing participation as well as the reduced rate. Xcel reported a year-end 2015 tracker balance of $499,977. Per the October 26, 2012 Order, the rate will return to $0.00445 per therm on January 1, 2017, assuming no change occurs as a result of the multi-year evaluation Xcel is to submit by May 31, 2016.

The Department concludes that Xcel has provided the information required by the Commission.

C. MERC

Due to the merger with IPL, MERC stated that its report now includes former IPL customers:

> At the time of the sale, IPL had only 68 customers enrolled in GAP. Only 12 of those customers had arrears, all less than $100. Alliant also had a small number of customers who had larger credit balances. Six of these customers had credit balances of more than $500. MERC sent letters and a MERC GAP application to all of these customers after the transition. In the first month, only 28 of these customers completed and returned the application and were enrolled in MERC's GAP. Over time, some additional customers have enrolled. The now-transitioned IPL participants are included in the scope of this report.

MERC's 2015 year-end tracker balance was $1,258,501, with total program costs in 2015 of $927,210. In compliance with the Commission's Order dated September 25, 2015, in Docket No. G011/M-15-539, the surcharge was decreased from $0.00441 per therm to $0.00 per therm effective October 1, 2015. MERC stated that it will monitor the tracker balance and expects to petition the Commission to reinstate a positive surcharge factor once the tracker balance approaches zero.

The Department concludes that MERC has provided the information required by the Commission.

D. GREAT PLAINS NATURAL GAS

In the May 12, 2008 Order approving its GAP,[5] Great Plains was ordered to submit:

- An evaluation of the assumed GAP participation rate of five percent in light of actual participation in the Program;
- The actual annual average cost per participant for the program, and an explanation of deviations from the assumed average annual cost per participant of $555; and
- Great Plains' conclusion regarding the reported evaluation data.

In 2015, the number of GAP applications Great Plains received increased 4 percent from the previous year, to 438 applications. However, LIHEAP applications decreased by 11.65

[5] Docket No. G004/M-07-1235.

percent in 2014. Of the 438 applicants, 215 qualified for GAP and 179 were enrolled in the Program. GAP participants represent 11 percent of its customers qualifying for LIHEAP. The average cost per GAP participant was $210.49 in 2015 compared with the original assumed cost per participant of $555. Great Plains indicates that the difference is largely due to the number of customers enrolled in GAP without arrears, customers continuing to exceed the current household income requirement, and lower gas costs.

Beginning in 2012, Great Plains' GAP surcharge was set to $0.0 per dekatherm. The Commission extended the Program with a continued $0.0 per dekatherm surcharge through 2016 in a November 26, 2014 Order. Due to the declining GAP tracker balance (as of 2015 year-end, $21,876) and 2015 actual program costs of $40,428, it may be reasonable to re-institute the GAP surcharge for the 2017 program year. Additional discussion of the ongoing program is expected, as Great Plains will file its Evaluation Report by June 1, 2016.

The Department concludes that Great Plains has provided the information required by the Commission.

E. COST ALLOCATION

In response to the September 19, 2015 Order, each utility included a discussion of why it does not assess the GAP surcharge against Interruptible Sales and Transportation Customers, a proposal evaluating cost allocation methods for its GAP program, and the recalculated surcharge for various alternatives if Interruptible Sales and Transportation Customers were included.

As Great Plains has an approved GAP surcharge of $0.00 per therm until December 31, 2016, any reallocation would result in no change for this year. Accordingly, the Company indicated that it is indifferent to allocation method at this time. It has proposed to address this issue in its June 2016 Evaluation Report.

MERC also currently has a surcharge of $0.00, and has sufficient tracker funds available to cover the 2016 program year assuming the 2015 actual and budgeted levels will continue through 2016. Although a change to include Interruptible Sales and Transportation Customers in the surcharge assessment would not affect MERC's 2016 program year, the Company argued against a per-therm charge levied on Interruptible Sales and Transportation customers, claiming that much of the benefits of this program are received by only the residential customer class. Further, MERC stated that large interruptible and transportation customers are sensitive to rate increases, and could bypass MERC's system. If bypassed, MERC that it would be a struggle to regain those customers, resulting in higher rates for all of MERC's remaining customers.

CenterPoint objected to changing the current allocation method. In compliance with the Commission's directive, CenterPoint showed the effect of changing the GAP cost allocation to include additional customer classes; specifically, the impact of including 1) all firm plus small volume dual fuel (SVDF) sales and transportation customers, and 2) all firm plus SVDF sales and transportation customers, plus large volume dual fuel (LVDF) sales and transportation customers. CenterPoint's table is reproduced below.

Table 1: Typical Bill Impacts (excl. Market Rate)

Rate Class	Customer Count	ALL Firm (Current Method)	All Firm+SVDF Sales & Transport	All Firm+SVDF Sales & Transport+LVDF Sales & Transport
Residential	772,307	$4.27	$3.74	$3.31
Comm A	28,961	$3.59	$3.15	$2.79
Comm/Ind B	19,602	$13.91	$12.21	$10.81
Comm/Ind C	18,783	$70.67	$62.03	$54.90
Large Volume Firm Sales	1	$1,770.64	$1,554.15	$1,375.5
SVDF A-Sales	1,753		$175.95	$155.73
SVDF A-Transport	184		$309.87	$274.25
SVDF B-Sales	309		$591.08	$523.14
SVDF B-Transport	76		$931.94	$736.31
Large Volume DF-Sales	69			$1,758.97
Large Volume DF-Transport	137			$3,309.36

CenterPoint concluded that allocating the program costs to dual fuel sales and service customers and transport customers using a per-therm allocation factor was not reasonable because it would result in potentially significant bill impacts to those customer classes, with relatively insignificant reductions for residential customers. CenterPoint also appeared to argue that customers not eligible for the GAP should not be responsible for the costs.

Finally, CenterPoint noted that “if the Commission were to require Interruptible Customers to pay the GAP surcharge, the Company believes both sales and transportation customers should pay for the program to avoid the creation of an arbitrary financial incentive favoring one service over the other.”

Xcel also presented a per-therm allocation method that included transportation and interruptible customers. For residential customers, the average annual surcharge would drop from $3.68 to $2.29. Xcel’s large volume interruptible transportation customers would be charged an average of $58,009 annually, and large firm transportation customers, $56,316 annually. Accordingly, Xcel stated the following:

> Allocating program costs using the sales allocator results in unusually high bill impacts for transportation customers. Historically, the Company has set Transportation and Interruptible Sales rates to be equal, with the exception of a slightly higher Transportation customer charge, so that the Company remains indifferent if the customer wants to purchase their gas supply from another party. Interruptible Sales and Transportation customers have alternative fuel sources, and therefore are market sensitive customers. Imposing a volumetric surcharge on these customers creates an incentive to switch to their alternate fuel.

As an alternative to a volumetric charge, Xcel presented an allocation method that would include transportation and interruptible customers and be allocated based on the customer charge ratio. Under this method, fixed monthly surcharges would be determined by class according to the ratio of each class' customer charge in relation to the residential customer charge. Although this allocation method would moderate the price increases for interruptible and transportation customers, it would increase the average annual surcharge for residential customers from $3.68 to $4.59. The Company stated that it would support this allocation method as it "provides moderate rate impacts for all customers while funding the program in a stable and predictable manner." An excerpt of the comparison data Xcel provided in their Attachment E is contained in Table 2 below.

Table 2: Comparison of Alternative Allocation Methods
Annual Average GAP Surcharge

	Current Method	All Customers, Volumetric Allocation	All Customers, Customer Charge Allocation
Residential	$3.68	$2.29	$4.59
Small Commercial	$12.05	$7.49	$12.75
Large Commercial	$65.26	$40.53	$25.49
Small Demand Billed	$315.22	$195.76	$76.48
Large Demand Billed	$958.56	$595.28	$140.21
Small Volume Interruptible		219.01	$73.93
Medium Volume Interruptible		$1,540.16	$152.95
Large Volume Interruptible		$14,939.31	$229.43
Large Firm Transportation		$56,316.24	$152.95
Medium Interruptible Transport		$9,847.77	$165.70
Large Interruptible Transport		$58,008.98	$242.17

The Department does not agree with CenterPoint's argument that the residential customer class "creates all the costs of the program and receives all the benefits of the program." As CenterPoint noted, the Commission required GAP costs to be recovered from the utilities' firm customers, reasoning that, "Because the plan is designed to reduce CenterPoint's administrative costs and to benefit society at large, it is appropriate that the costs be borne by a broader section of CenterPoint's ratepayers, and of society at large."[6] System wide benefits are reflected in part in CenterPoint's data for 2015, which indicates that disconnection rates for GAP participants was much lower than for LIHEAP ratepayers who were not GAP participants.

The utilities did not provide a clear distinction between firm and interruptible customers that would justify treating the customer classes differently. All customer classes share in any benefits that may accrue from the GAP (such as reduction in bad debt expense and savings from reduced meter disconnections). Further, the extent to which interruptible customers are actually being interrupted is not a part of this record to date, but would be a relevant consideration to a discussion identifying a distinction between firm and interruptible customers for the purposes of GAP recovery.

The Department agrees that there is some merit in ensuring that any surcharge does not result in a perverse incentive to choose one rate class over another (*i.e.*, incent customers to switch from sales to transportation customers in order to avoid the GAP surcharge) or to choose an alternate fuel source. However, there may be other rate design options (such as a hybrid rate design that would set a per-therm rate for firm customers and a flat rate for interruptible customers) that could be developed to mitigate those concerns.

Should the Commission wish to pursue this matter further, the Department recommends that the Commission require the utilities to provide additional information in next year's GAP annual reports in order to more fully develop the record. For instance, the Commission could require the utilities to provide:

- Historical data demonstrating the extent to which interruptible customers are interrupted, and
- Optional rate designs intended to mitigate concerns regarding the GAP surcharge's impact on fuel selection and/or rate class.

III. SUMMARY OF DEPARTMENT RECOMMENDATIONS

The Department recommends that the Commission **accept**:

- CenterPoint Energy's GAP Report submitted in Docket No. G008/M-16-266;
- Xcel Energy's GAP Report submitted in Docket No. G002/M-16-272;
- Minnesota Energy Resources Corporation's GAP Report submitted in Docket No. G011/M-16-273; and
- Great Plains Natural Gas Company's GAP Report submitted in Docket No. G004/M-16-275.

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[6] Docket No. G008/GR-05-1380, *Findings of Fact, Conclusions of Law, and Order*, p. 49 (November 2, 2006).

2015 GAP Annual Compliance Summary

	Great Plains	MERC	CenterPoint	Xcel
Avg. Annual Affordability Benefit per customer	$217.44	$376.00	$459.63	$241.00
Avg. Annual Arrearage Forgiveness per customer	$57.74	$16.88	219.99	$30.00
% of LIHEAP customers participating in GAP	11.2%	13.0%	34.1%	43.0%
Disconnection rates for:				
(a) GAP customers	7.8%	3.5%	4.0%	5.0%
(b) LIHEAP-non-GAP	19.3%	8.5%	10.2%	9.0%
(c) All firm customers	2.7%	2.0%	3.8%	<1.0%
No. of GAP participants at year-end	133	1,546	10,769	7,131
No. of GAP participants enrolled & receiving benefits at some time during the year	174	1,993	13,964	11,041
Annual Program budget	$50,000	$1,000,000	$5,000,000	$2,500,000
Actual Program revenue	$0	$975,650	$5,052,215	$2,223,702
Actual Program cost	$40,428	$927,210	$6,563,530	$3,182,578
GAP tracker balance as of year-end	$21,876	$1,258,501	$525,858	$499,977
GAP rate-affordability surcharge ($/therm)	$0	$0.00441*	$0.00470	$0.00400

* Partial year. Rate is $0.00/therm effective 10/01/2015 as balance exceeds annual program budget and actual 2015 costs.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, 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
Comments

Docket No. G008/M-16-266, G002/M-16-272, G011/M-16-273, and G004/M-16-275

Dated this 2nd day of May 2016

/s/Sharon Ferguson

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