



COOPERATIVE ENERGY FUTURES
COMMUNITY POWERED ENERGY

March 22nd, 2024

William Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place E., Suite 350
St. Paul, MN 55101

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

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

RE: Cooperative Energy Futures' Reply Comments In the Matter of Xcel Energy's Tariff Revisions Updating Community Solar Garden Tariff Providing Additional Customer Protections in Subscription Eligibility. (E-002/M-21-695)

In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of its Proposed Community Solar Garden Program. (E-002/M-13-867)

Dear Mr. Seuffert,

Cooperative Energy Futures ("CEF") appreciates the opportunity to submit reply comments to the Public Utilities Commission (the "PUC" or the "Commission") regarding Xcel's Energy's ("Xcel" or the "Company") tariff revisions updating the Community Solar Garden (CSG) tariff providing additional customer protections in subscription eligibility.

Issue and Topic Open for Comment:

- **Does Xcel Energy's January 16, 2024 compliance filing meet the requirements of the Commission's August 11, 2023 Order?**
- **Are there other issues or concerns related to this matter?**

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DOES XCEL ENERGY'S JANUARY 16, 2024 COMPLIANCE FILING MEET THE REQUIREMENTS OF THE COMMISSION'S AUGUST 11, 2023 ORDER?

Cooperative Energy Futures greatly appreciates the Company's efforts to work with the Department of Commerce (the "Department") to make administrative changes to their billing system and the tariff in order to comply with the Commission's directive to find a process to allow tenants of buildings that use the Building Subscription Model, and sign these tenants up for CSGs, to remain a customer of record and continue being eligible for Xcel's energy affordability programs. CEF believes the changes in the Company's 1/16/24 compliance filing¹ are sufficient to meet the requirements of the Commission's 8/11/23² Order and should therefore be approved.

ARE THERE OTHER ISSUES OR CONCERNS RELATED TO THIS MATTER?

CEF agrees with some of the concerns expressed by other parties, in initial comments, as to how the *In Care of Billing* process would work as it is currently proposed as well as a few consumer protection concerns.

As the Citizens Utility Board ("CUB") and the Energy Cents Coalition ("ECC") state in their initial comments³⁴, it appears that the *In Care of Billing* process is in conflict with the recently modified tariffs. We do not believe this was the Company's intent and the Commission should direct the Company to correct the tariff language so that tenants that choose to Opt-in to a CSG associated with the Building Subscription Model can still participate in the *In Care of Billing* process.

We also agree with CUB and ECC, in their initial comments⁵⁶, when they express concerns about the lack of a paper bill. Under Xcel's current proposal for *In Care of Billing*, tenants would

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<https://www.edockets.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={005A148D-0000-CC12-9EAF-6FDE633E2C06}&documentTitle=20241-202227-01>

2

<https://www.edockets.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={80AAE589-0000-CC1E-A554-C1FFF0A1643B}&documentTitle=20238-198179-01>

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<https://efiling.web.commerce.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={50951F8E-0000-C119-ADD6-DA030B5F3BBE}&documentTitle=20243-204179-01>, page 5.

4

<https://www.edockets.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={90931F8E-0000-C017-A38B-4DE5C20F1F22}&documentTitle=20243-204177-01>, page 7.

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<https://efiling.web.commerce.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={50951F8E-0000-C119-ADD6-DA030B5F3BBE}&documentTitle=20243-204179-01>, page 6.

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<https://www.edockets.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={90931F8E-0000-C017-A38B-4DE5C20F1F22}&documentTitle=20243-204177-01>, page 6.

only be able to access their Xcel bill online. It is well known that internet access can be limited for people with limited financial means, which is exactly the population we are discussing, therefore we believe it is necessary for these tenants to receive a paper bill. Receiving a paper bill will also eliminate other complications that may arise when qualifying for other energy affordability programs.

Finally, we agree with ECC's concerns⁷ in their initial comments regarding a tenant's possible lack of awareness for eligibility in Xcel's energy affordability programs. If a tenant agrees to Opt-in to a CSG Building Subscription Model, they should be notified, by mail, that they are still an Xcel customer of record and that they are still eligible to participate in Xcel's energy affordability programs.

CONCLUSION

Cooperative Energy Futures is, overall, pleased with the Company's progress on this issue and believes that the Commission should approve Xcel's 1/16/24 compliance filing *provided they address concerns expressed by multiple parties regarding conflicts in the Company's recent tariff filings and the Company's proposed In Care of Billing process as well concerns, also expressed by multiple parties, regarding the absence of a paper bill and lack of awareness of possible eligibility for Xcel's energy affordability programs.*

We would like to thank the Commission for this opportunity to submit reply comments and for their dedication to ensuring that tenants who are eligible for, and deserve access to, energy affordability programs receive the opportunity to do so.

Sincerely,

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<https://www.edockets.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={90931F8E-0000-C017-A38B-4DE5C20F1F22}&documentTitle=20243-204177-01>, page 5.

