

August 7, 2017

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket Nos. G002/M-17-253, G004/M-17-254, G008/M-17-245, G011/M-17-247, and
G022/M-17-234

Dear Mr. Wolf:

Attached are the response comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) regarding the gas affordability program annual reports filed at the end of March in the above-referenced dockets.

Having reviewed the additional information provided by the utilities in their July reply comments, the Department now recommends that the Minnesota Public Utilities Commission (Commission) accept all of the utilities' annual reports. The Department is available to respond to any questions the Commission may have on this matter.

Sincerely,

/s/ STEPHEN COLLINS
Rates Analyst

SC/ja
Attachment



Before the Minnesota Public Utilities Commission

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

Docket Nos. G002/M-17-253, G004/M-17-254, G008/M-17-245, G011/M-17-247,
and G022/M-17-234

I. INTRODUCTION

On June 26, 2017, the Minnesota Department of Commerce, Division of Energy Resources (Department) filed initial comments regarding whether the gas affordability program (GAP) annual reports filed this year by the state's five rate-regulated gas utilities complied with applicable reporting requirements. The Department concluded that the report by Greater Minnesota Gas (GMG) had complied with all applicable requirements, but that the reports by CenterPoint Energy (CenterPoint), Great Plains Natural Gas Company (Great Plains), Minnesota Energy Resources Corporation (MERC), and Xcel Energy (Xcel) had not. Therefore, the Department recommended that the Minnesota Public Utilities Commission (Commission) make its acceptance of the latter four utilities' annual reports contingent on the utilities providing additional information. The Department also requested that the some of the utilities clarify certain information provided in their annual reports.

In July, the utilities filed reply comments providing additional information. CenterPoint, MERC, and Xcel each filed their respective reply comments on July 7, 2017; GMG filed reply comments on July 13, 2017; and Great Plains filed reply comments on July 19, 2017.

II. ANALYSIS

Below, the Department reviews the additional information provided by the utilities and, where applicable, analyzes whether the additional information is sufficient to rectify compliance with reporting requirements. As in its initial comments, the Department organizes its analysis by reporting requirement. For clarity's sake, the Department also updates the summary tables provided in its initial comments, with updated information marked in **red text**.

A. SUMMARY SCHEDULE

The Department's initial comments concluded that all utilities had complied with the requirement to provide a summary schedule of key GAP metrics. However, the Department also concluded that it would be helpful for GMG to present the disconnection rate for non-GAP LIHEAP customers, which GMG provided in its summary schedule, using the number of non-GAP LIHEAP customers as the denominator (as done by other utilities). Great Plains provided this information in its reply comments. The Department updates Table 1 from in its initial comments accordingly.

Table 1: Summary Schedule Information for 2016

Item	CenterPoint	GMG	Great Plains	MERC	Xcel
Average annual affordability benefit received per customer	\$291	\$250	\$99	\$432	\$208
Average annual arrearage forgiveness benefit received per customer	\$196	\$23	\$32	\$7	\$24
% of LIHEAP customers that participated in GAP	26%	23%	3%	13%	41%
Disconnection Rates:					
(a) GAP customers	3.3%	0.0%	4.2%	0.8%	4%
(b) Non-GAP LIHEAP customers	7.8%	8.5%	10.7%	0.5%	7%
(c) Non-LIHEAP customers (all firm customers incl. C&I)	3.8%	0.7%	2.4%	0.3%	<1%
Number of GAP participants enrolled as of year-end	8,558	15	28	1,557	6,415
# GAP participants enrolled and receiving benefits at some time during the year	11,004	18	48	1,611	10,116
Annual program budget	\$5,000,000	\$20,000	\$50,000	\$750,000	\$2,500,000
Actual program revenue	\$4,444,009	\$0	\$0	\$2,558	\$2,084,441
Actual program cost	\$3,184,859	\$12,284	\$7,299	\$707,354	\$2,519,708
Tracker balance as of year end	\$1,767,477	-\$25,406	\$14,577	\$569,249	\$64,710
Surcharge (\$/therm)	\$0.00462	\$0.00000	\$0.00000	\$0.00000	\$0.00400

B. PAYMENT FREQUENCY (REQUIRED OF ALL UTILITIES EXCEPT GMG)

The Department’s initial comments concluded that the payment-frequency information provided by Great Plains and MERC appeared not to include the required comparison of the payment frequency for customers before and after GAP enrollment. In response, Great Plains and MERC provided this information in their reply comments. The Department updates Tables 3 and 4 from its initial comments accordingly. For clarity’s sake, the Department also provides Table 2 from its initial comments. Note that while all utilities have complied with the payment frequency requirements, the utilities provided different metrics to comply with the requirement. For that reason, the Department uses three different tables to summarize the information provided. The use of the term “Not provided” in the tables simply indicates that the utility in question did not provide the required information in the indicated fashion.

Table 2: Payment Frequency in 2016
Dollars Paid ÷ Dollars Requested

Customer Group	CenterPoint	GMG	Great Plains	MERC	Xcel
GAP customers	35%	Not required	Not provided	Not provided	56%
GAP customers before they were enrolled in GAP	19%	Not required	Not provided	Not provided	65%
LIHEAP customers or Non-GAP LIHEAP customers	37%	Not required	Not provided	Not provided	57%

Table 3: Payment Frequency in 2016
Number of Payments Made ÷ Number of Payments Requested

Customer Group	CenterPoint	GMG	Great Plains	MERC	Xcel
GAP customers	34%	Not required	70%	Not provided	Not provided
GAP customers before they were enrolled in GAP	30%	Not required	68%	Not provided	Not provided
LIHEAP customers or Non-GAP LIHEAP customers	39%	Not required	37%	Not provided	Not provided

**Table 4: Payment Frequency in 2016
Number of Payments Made per Customer**

Customer Group	CenterPoint	GMG	Great Plains	MERC	Xcel
GAP customers	Not provided	Not required	Not provided	2 for all enrollees, 5 for new enrollees	Not provided
GAP customers before they were enrolled in GAP	Not provided	Not required	Not provided	7 for new enrollees	Not provided
LIHEAP customers or Non-GAP LIHEAP customers	Not provided	Not required	Not provided	10	Not provided

C. PAYMENT AMOUNTS (REQUIRED OF ALL UTILITIES EXCEPT GMG)

The Department's initial comments determined that all four applicable utilities provided the required information on payment amounts. For administrative ease, the Department reproduces Table 5 from its initial comments, below, which summarizes the information the utilities provided in this area.

Table 5: Average Credits vs. Average Bill

Item	CenterPoint	GMG	Great Plains	MERC	Xcel
Average annual affordability and arrearage credits received per GAP customer	\$486	Not required	\$95	\$480	\$232
Average annual bill per GAP customer	\$435	Not required	\$595	\$732	\$1,147
Average affordability and arrearage credits as % of average annual bill	112%	Not required	16%	66%	20%

Table 6: Average Affordability Credit vs. Average Bill in 2016

Item	CenterPoint	GMG	Great Plains	MERC	Xcel
Average annual affordability credits received per GAP customer	\$291	Not required	Not provided	Not provided	\$208
Average annual bill per GAP customer	\$435	Not required	\$595	\$732	\$1,147
Average affordability credit as % of average annual bill	67%	Not required	Not provided	Not provided	18%

Table 7: Average Arrearage Credit vs. Average Arrearage Balances in 2016

Item	CenterPoint	GMG	Great Plains	MERC	Xcel
Average annual arrearage forgiveness credits received per GAP customer	\$196	Not required	Not provided	Not provided	\$24
Average arrearage balance per GAP customer	\$207	Not required	\$165	-\$702	\$449
Average annual arrearage forgiveness credit as % of average arrearage balance	95%	Not required	Not provided	Not provided	5%

D. ARREARS (REQUIRED OF ALL UTILITIES EXCEPT GMG)

The Department's initial comments concluded that it appeared none of the four applicable utilities had complied with the requirement to report the program's effect on the number of customer in arrears. In response, the four utilities provided additional information to comply with this requirement, which the Department summarizes in the updated Table 8, below. The additional information provided by the utilities indicates that GAP decreased the number of customers in arrears in 2016.

Table 8: Number of Customers in Arrears in 2016

Customer Group	CenterPoint	GMG	Great Plains	MERC	Xcel
GAP	50% decrease	Not required	83% decrease	< 1%	6% increase
Non-GAP LIHEAP	Not provided	Not required	9% decrease	32%	21% increase
Residential	Not provided	Not required	20% decrease	15%	31% increase

The Department's initial comments also concluded that it appeared that Great Plains did not comply with the requirement to report the change in arrearage levels for the three customer groups (GAP, non-GAP LIHEAP, and residential). In response, Great Plains provided the change in arrearage levels of the three customer groups, as shown in the updated Table 9, below.

Table 9: Effect on Arrearage Levels (Change in Arrearage Levels) in 2016

Customer Group	CenterPoint	GMG	Great Plains	MERC	Xcel
GAP	-24%	Not required	-53%	-3%	+19%
Non-GAP LIHEAP	-14%	Not required	-49%	+29%	+29%
Residential	-31%	Not required	-6%	+28%	+126%

E. DISCONNECTIONS (REQUIRED OF ALL UTILITIES EXCEPT GMG)

The Department's initial comments concluded that all four applicable utilities had complied with the requirement to report the effect of GAP on service disconnections. However, the Department also concluded that it was not exactly clear how Great Plains had defined the figures it provided in order to comply with this requirement. Great Plains clarified this issue in its reply comments. The Department updates Table 10 from its initial comments accordingly.

Table 10: Disconnection Rates in 2016

Customer Group	CenterPoint	GMG	Great Plains	MERC	Xcel
GAP	3.3%	Not required	4.2%	0.8%	4%
Non-GAP LIHEAP	7.8%	Not required	10.7%	0.5%	7%
All Firm Customers	3.8%	Not required	2.4%	0.3%	1%

F. RETENTION (REQUIRED OF ALL UTILITIES EXCEPT GMG)

The Department's initial comments concluded that it appeared Great Plains had not complied with the requirement to report the effect of the GAP on retention rates. In response, Great

Plains showed that 28 participants remained on the program as of the end of 2016, representing a retention rate of 58% for the year.

G. COMPLAINTS (REQUIRED OF ALL UTILITIES EXCEPT GMG)

The Department’s initial comments concluded that all four applicable utilities complied with the requirement to provide data on the type and number of customer complaints. However, the Department also noted that it would be helpful for MERC to clarify the information that the company provided. MERC provided the requested clarification in its reply comments. The Department updates Table 11 from in its initial comments accordingly.

Table 11: Customer Complaints in 2016

Item	CenterPoint	GMG	Great Plains	MERC	Xcel
Number of Complaints	3	Not required	0	2	0
Type of Complaints	Payment extensions, reenrollment	Not required	n/a	Billing issue	n/a

H. COLLECTIONS (REQUIRED OF ALL UTILITIES EXCEPT GMG)

The Department’s initial comments concluded that it appeared CenterPoint and Great Plains had not complied with the requirement to report the effect of GAP on customer collection activity. CenterPoint and Great Plains provided additional information to address this issue in their reply comments. The Department updates Table 12 from its initial comments accordingly.

Table 12: Effect of GAP on Collection Activity in 2016

CenterPoint	GMG	Great Plains	MERC	Xcel
Reduced collection activity	Not required	Reduced collection activity	Reduced disconnection costs by \$525	Reduced collection activity

I. COORDINATION (REQUIRED OF ALL UTILITIES EXCEPT GMG)

The Department’s initial comments concluded that all utilities complied with the requirement to report information relating to how each utility has coordinated its GAP with other available low-income and conservation resources. However, the Department also suggested that in future annual reports it would be helpful for CenterPoint, Great Plains, and Xcel to provide more information, along the lines of the detailed analysis provided by MERC. Both Great Plains

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Analyst Assigned: Stephen Collins

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and Xcel agreed to provide additional information per the Department's suggestion. CenterPoint did not respond.

III. UPDATED CONCLUSION AND RECOMMENDATION

Having reviewed the additional information provided by utilities in their reply comments, the Department concludes that the utilities have complied with all applicable reporting requirements. Therefore, the Department recommends that the Commission accept the annual reports.

/ja

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
Response Comments**

Docket No. G002/M-17-253; G004/M-17-254; G008/M-17-245; G011/M-17-247; and G022/M-17-234

Dated this 7th day of August 2017

/s/Sharon Ferguson

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