



August 17, 2021

VIA ELECTRONIC FILING

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

Re: In the Matter of Gas Affordability Program Annual Reports
Docket Nos. G011/M-21-224 (MERC), and G002/21-220 (Xcel)

Dear Mr. Sueffert:

Enclosed please find the proposed Alternative Decision Options of the Energy CENTS Coalition in the above-referenced matters. If you have questions about these comments, please call me at 651-470-4500.

Sincerely,

Pam Marshall

Executive Director
Energy CENTS Coalition

Energy CENTS Coalition
Alternative Decision Options

19. Require Xcel to change its GAP affordability credit threshold from 4% to 3% of participating customer income, ~~until the tracker balance goes below \$50,000; and then require Xcel to file, after the \$50,000 threshold is reached, a proposal~~ and to discuss, in its next scheduled GAP filing, ~~on~~ the effect of the change on the program tracker balance and whether or not to revert the threshold to 4%, maintain the threshold at 3%, or move the threshold to a different level.

21. Approve MERC's proposal to temporarily suspend the \$750,000 annual spending cap ~~until~~ when a permanent modification to its 3% threshold is ~~approved~~ implemented.

25. Require MERC to, ~~as soon as possible~~ within 30 days, reduce the affordability threshold to 3% ~~until the tracker balance is under \$50,000, at which point MERC would then be required to submit,~~ and, in its next scheduled GAP filing, ~~a proposal~~ to discuss the effect of the change on the program tracker balance and ~~on~~ whether to revert, maintain, or otherwise modify the affordability threshold; whether to reduce the surcharge; as well as what to do regarding the spending cap.

29. ~~Require the Company to explain how, if GAP payments are set at 6% of household income, GAP benefits cover 68% of an average annual gas bill. (Energy Cents)~~

~~a) Require the Company to provide the average annual income for GAP customers.~~

~~b) Require the Company to explain if, and how, the current average affordability credit contributes to the average negative GAP customer credit balance~~

Require the Company to calculate GAP credits based on actual annual participant natural gas bills.

AFFIDAVIT OF SERVICE

Pam Marshall certifies that on the 17th day of August 2021, she served, by electronic filing, Energy CENTS Coalition Alternative Decision Options In the Matter of Gas Affordability Program Annual Reports, Docket Nos. G011/M-21-224 (MERC), and G002/21-220 (Xcel) to the individuals on the attached service list.

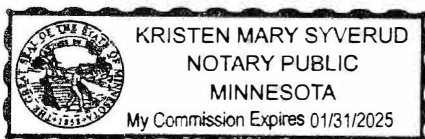
Pam Marshall

Pam Marshall

KMS

Kristen Syverud

Subscribed and sworn to before me
this 17th day of August 2021



Notary Public

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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