



414 Nicollet Mall
Minneapolis, Minnesota 55401-1993

August 24, 2017

—Via Electronic Filing—

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

RE: PETITION
MEDICAL AFFORDABILITY PROGRAM
DOCKET NO. E002/M-17-_____

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits this request for approval of a modification to its electric Low Income Energy Discount Program (Low Income Program) to the Minnesota Public Utilities Commission. Our proposal is pursuant to the August 16, 2016 Stipulation of Settlement (Settlement) between Parties as approved in the Commission's June 12, 2017 Findings of Fact, Conclusions and Order in Docket No. E002/GR-15-826.

Our request was initially submitted in Docket No. E002/GR-15-826 on August 21, 2017 and is being resubmitted in a new docket as a miscellaneous tariff filing. We have electronically filed this document with the Commission, which also constitutes service on the Department of Commerce and the Office of the Attorney General – Antitrust and Utilities Division. A copy of this filing has been served on all parties on the attached service lists.

Please contact me at (612) 330-6935 or gail.baranko@xcelenergy.com or Pat Boland at (651) 639-4407 or patrick.j.boland@xcelenergy.com if you have questions regarding this filing.

Sincerely,

/s/

GAIL A. BARANKO
MANAGER, REGULATORY PROJECT MANAGEMENT
NSPM REGULATORY

Enclosures
c: Service Lists



414 Nicollet Mall
Minneapolis, Minnesota 55401-1993

August 21, 2017

—Via Electronic Filing—

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
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RE: PETITION
MEDICAL AFFORDABILITY PROGRAM
DOCKET NO. E002/GR-15-826

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits this request for approval of a modification to its electric Low Income Energy Discount Program (Low Income Program) to the Minnesota Public Utilities Commission. Our proposal is pursuant to the August 16, 2016 Stipulation of Settlement (Settlement) between Parties as approved in the Commission's June 12, 2017 Findings of Fact, Conclusions and Order (Order) in Docket No. E002/GR-15-826.

We propose to develop and implement a customer bill payment assistance program exclusively for low-income customers with chronic or severe medical conditions. The proposed name is the "Medical Affordability" program.

We have electronically filed this document with the Commission, which also constitutes service on the Department of Commerce and the Office of the Attorney General – Antitrust and Utilities Division. A copy of this filing has been served on all parties on the official service list in this docket.

Please contact me at (612) 330-6935 or gail.baranko@xcelenergy.com or Pat Boland at (651) 639-4407 or patrick.j.boland@xcelenergy.com if you have questions regarding this filing.

Sincerely,

/s/

GAIL A. BARANKO
MANAGER, REGULATORY PROJECT MANAGEMENT
NSPM REGULATORY

Enclosures
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Nancy Lange	Chair
Dan Lipschultz	Commissioner
Matthew Schuerger	Commissioner
Katie Sieben	Commissioner
John Tuma	Commissioner

IN THE MATTER OF THE APPLICATION OF
NORTHERN STATES POWER COMPANY
FOR AUTHORITY TO INCREASE RATES FOR
ELECTRIC SERVICE IN THE STATE OF
MINNESOTA

DOCKET No. E002/GR-15-826

MODIFICATION TO
LOW INCOME ENERGY DISCOUNT PROGRAM:
MEDICAL AFFORDABILITY PROGRAM PETITION

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits this request for approval of a modification to its electric Low Income Energy Discount Program (Low Income Program) to the Minnesota Public Utilities Commission. Our proposal is pursuant to the August 16, 2016 Stipulation of Settlement (Settlement) between Parties as approved in the Commission's June 12, 2017 Findings of Fact, Conclusions and Order (Order) in Docket No. E002/GR-15-826 and the direction provided in the amended Multi-Year Rate Plan Statute.¹

We propose a customer bill payment assistance program exclusively for low-income customers with chronic or severe medical conditions. We are committed to expanding our affordability programming to individuals experiencing certified medical circumstances with an income level up to 50 percent of the state median income guidelines² currently used to determine eligibility for energy assistance from the federally-funded, state-administered Low Income Home Energy Assistance Program (LIHEAP). We make this proposal for an increase of \$3 million in funding to our Low Income Program in an effort to aid customers struggling with their electric bills.

The new "Medical Affordability" program will use the Company's PowerON program as a model, incorporating the following elements as detailed in Section III, page 9 of the Settlement and page 12 of the Order:

¹ Minn. Stat. § 216B.16, subd. 19 (a)(3).

² If funds remain, the program would allow customers up to 60 percent of the state median income guidelines to enroll.

- Affordability credit to limit the percentage of household income customers devote to electric costs;
- Arrearage forgiveness component requiring customers to contribute a payment toward arrears (in addition to the affordability payment) in order to receive a matching monthly credit from the Company;
- Income eligibility for participation up to 50 percent of the state median income (SMI) and, if funds remain, allow customers up to 60 percent SMI to enroll;
- Assistance on a first-come/first-served basis until the program budget is exhausted;
- Administrative costs limited to no more than five percent of the annual budget;
- Reporting and program fund tracking requirements of PowerON; and
- Program costs recovered on the same basis as PowerON.

We sought input from the Energy CENTS Coalition (ECC)³ for the design and implementation of the Medical Affordability program and will work directly with ECC to ensure the program is targeted to those most needing bill payment assistance due to medical circumstances and meeting the eligibility requirements. We look forward to adding this offering to our Low Income Program framework to further support customers and help ensure their continued electric service. We propose to implement the program January 1, 2018; an increased surcharge designed to recover the \$3 million in additional funding would be reflected on customers' bills starting on that date.

The balance of this petition provides background on the Company's Low Income Program components, discusses the need to add a bill payment assistance component for customers with certified medical circumstances, and outlines the planned features of the proposed Medical Affordability program.

We respectfully request the Commission approve this request for modification of the Company's electric Low Income Program and look forward to discussion regarding our proposal.

I. SUMMARY OF FILING

A one-paragraph summary is attached to this filing pursuant to Minn. R. 7829.1300, subp. 1.

³ The Energy CENTS Coalition, a statewide non-profit organization, was formed in 1988 to promote more affordable utility service for low and fixed income Minnesotans.

II. SERVICE ON OTHER PARTIES

Pursuant to Minn. R. 7829.1300, subp. 2, the Company has served a copy of this filing on the Office of the Attorney General – Antitrust and Utilities Division. A summary of the filing has been served on all parties on the enclosed service list.

III. GENERAL FILING INFORMATION

Pursuant to Minn. R. 7829.1300, subp. 3, the Company provides the following information:

A. Name, Address, and Telephone Number of Utility

Northern States Power Company, a Minnesota corporation
414 Nicollet Mall
Minneapolis, MN 55401
(612) 330-5500

B. Name, Address, and Telephone Number of Utility Attorney

Mara K. Ascheman
Senior Attorney
Xcel Energy
414 Nicollet Mall, 401 8th Floor
Minneapolis, MN 55401
(612) 215-4605
mara.k.ascheman@xcelenergy.com

C. Date of Filing and Proposed Effective Date of Rates

The date of this filing is August 21, 2017. The Company requests the Commission grant approval of this Petition with an effective date of January 1, 2018.

D. Statutes Controlling Schedule for Processing the Filing

Minn. Stat. § 216B.16, subd. 1, requires 60 days' notice of a proposed tariff change, after which time the proposed tariff change takes effect unless suspended by the Commission. This statute, however, does not prescribe a schedule for processing this filing. Since no determination of the Company's general revenue requirement is caused by the proposed tariff changes discussed in this filing, the Petition falls within the definition of a "Miscellaneous Tariff Filing" under Minn. R. 7829.0100, subp. 11. Pursuant to Minn. R. 7829.1400, initial comments on a miscellaneous tariff filing are due within 30 days of filing, with replies due 10 days thereafter.

E. Utility Employee Responsible for Filing

Gail A. Baranko
Manager, Regulatory Project Management
Xcel Energy
414 Nicollet Mall, 401 7th Floor
Minneapolis, MN 55401
(612) 330-6935
gail.baranko@xcelenergy.com

IV. EFFECT OF CHANGE UPON XCEL ENERGY REVENUE

No change to Xcel Energy revenue is expected or necessary as a result of these proposed tariff modifications. The existing tracker mechanism ensures the Company is revenue neutral to the rate change.

V. MISCELLANEOUS INFORMATION

Pursuant to Minn. R. 7829.0700, the Company requests that the following persons be placed on the Commission's official service list for this proceeding:

Mara K. Ascheman
Senior Attorney
Xcel Energy
414 Nicollet Mall, 401 8th Floor
Minneapolis, MN 55401
mara.k.ascheman@xcelenergy.com

Carl Cronin
Regulatory Records
Xcel Energy
414 Nicollet Mall, 401 7th Floor
Minneapolis, MN 55401
regulatory.records@xcelenergy.com

Any information requests in this proceeding should be submitted to the Regulatory Records email address above.

VI. DESCRIPTION AND PURPOSE OF FILING

A. Low Income Energy Discount Program Background

The Company has provided payment assistance to eligible low-income electric customers in the form of bill discounts since 1995 in response to legislation⁴ at the time calling for utilities with more than 200,000 residential electric customers and requesting rate increases to establish affordability programs for low-income ratepayers. The Company's resulting and current Low Income Program has two components--a "Discount Program" for low-income senior and disabled customers,

⁴ Minn. Stat. § 216B.16, subd. 14.

and a "PowerON" program for low-income customers with higher energy usage. Combined, the programs provided bill relief for over 45,000 households with over \$11.3 million in Company disbursements during the 2016 program year, per the year-end tracker. Our Personal Account Representatives (PAR) team provides overall direct customer service to program participants, as well as our other low-income and medical/life-support customers, and administers and promotes the programs in partnership with ECC. We provide program descriptions below.

1. *Discount Program*

Xcel Energy implemented its Discount Program in 1995 to satisfy the requirements of Minn. Stat. § 216B.16, subd. 14. The Commission approved our proposal in its January 11, 1995 Order in Docket No. E002/M-94-925. The Commission also approved related tracker accounts and rate adjustments to fund anticipated participation levels at that time.

Customers are eligible to participate in the Discount Program once they are certified to receive LIHEAP benefits and have declared on their LIHEAP application that they are 62 years of age or older and/or disabled. The Department of Commerce administers LIHEAP for Minnesota residents and informs us when a customer is eligible for the Discount Program in a program year. Once we are informed a customer is eligible, we code the account accordingly in our billing system, which then automatically applies the discount to the customer's monthly bills for the program year.⁵ The Department continues to report customer eligibility to our PAR team on a monthly basis throughout the program year as customers are certified for LIHEAP.

As required by law,⁶ Xcel Energy offers qualifying low-income customers a \$15 discount every 30 days on their monthly bill. Participation in the Discount Program correlates to available LIHEAP funding; as funding levels increase, and more of our low-income customers become eligible for LIHEAP, participation in our Discount Program expands proportionally.

2. *PowerON*

In 2004, the Minnesota Legislature revised Minn. Stat. § 216B.16, subd. 14 to provide large utilities with the flexibility to modify their bill payment assistance programs in ways that target customers with the lowest income and highest energy costs. In response to the statutory change, we created PowerON, our affordability program for qualified low-income customers. The Commission approved our PowerON proposal in its April 26, 2005 Order in Docket No. E002/M-04-1956. Like the Discount Program, customers must be certified as eligible to receive LIHEAP benefits in order

⁵The program year is October 1 to September 30, which coincides with the LIHEAP year.

⁶ Minn. Stat. § 216B.16, subd. 14.

to participate in PowerON. Participating customers must also agree to a payment plan and remain in compliance with that plan in order to continue receiving PowerON benefits. If a customer misses two consecutive payments, they are removed from PowerON.

When PowerON is open for enrollment, we send targeted, informational mailings to past LIHEAP recipients.⁷ These mailings contain PowerON applications, return envelopes and instructions for the customer to return the application to ECC. After receiving a completed application, ECC combines consumption information the Company provides with income information the customer provides in order to calculate each applicant's potential PowerON benefit.⁸

ECC also includes any past due amounts in its calculation of PowerON benefits, again, based on information the Company provides. The entire enrollment and verification process takes approximately two weeks and concludes with a communication from ECC to the applicant indicating whether the applicant was accepted into PowerON.

Our billing system applies the PowerON benefits automatically to participant accounts that are current on their payment plans. Participants who are not current on their payment plans are flagged by the billing system for follow-up by our PAR team. PAR team follow-up includes payment reminders when participants are 30 days past due, working with participants to secure payments, or directing participants to other resources, such as social service agencies, to help them get back on track with their payment plans. Actual participant benefits vary depending on the participant's specific energy use, income level, and amount of arrears.

3. Change in Funding Requirements

The 2014 Legislative Session brought a change to Minn. Stat. § 216B.16, subd. 14, establishing a base annual program funding level of \$8 million for low-income affordability programs. Also, the funding is now required to increase in conjunction with general rate increases for residential customers, and a flat \$15 discount on each eligible Discount Program participant's total monthly bill replaced the previously used percentage-based energy charge discount.

B. Need for Modification to the Company's Low Income Program

1. No Assistance for Customers Over Income Level but with High Usage Due to Medical Equipment

⁷ Customers can also request that we mail them an application, or can access an application on-line at the Xcel Energy or ECC websites.

⁸ Applicants consent to the Company's disclosure of their usage information and billing history to ECC as part of the PowerON application process.

Despite steady participation levels in the Low Income Program, eligibility is limited to customers having received energy assistance through LIHEAP in the previous 12 months. We acknowledge this criterion has excluded individuals who are slightly over LIHEAP's income guidelines, but who cannot meet their electric bills due to the necessity of life-sustaining medical equipment requiring electricity that results in higher usage. We have documented that the average monthly consumption by customers on life support equipment is consistently higher than that of low-income-designated and other residential customers, that they often carry large past-due bill balances as a result, and can thus be at greater risk of service disconnection. (See data provided below.)

Minn. Stat. § 216B.098, subd. 5 (a) acknowledges that customers with medical concerns might face bill payment difficulties, addresses continued service to such customers, and requires that:

(a) A utility shall reconnect or continue service to a customer's residence where a medical emergency exists or where medical equipment requiring electricity necessary to sustain life is in use, provided that the utility receives written certification, or initial certification by telephone and written certification within five business days, that failure to reconnect or continue service will impair or threaten the health or safety of a resident of the customer's household... (c) Except as provided in paragraph (d), a certification may not extend beyond six months from the date of written certification. (d) If a utility determines that a longer certification is appropriate given a particular customer's circumstances, the utility may, at its sole discretion, extend the duration of a certification for up to 12 months... (f) A customer whose account is in arrears must contact and enter into a payment agreement with the utility. The payment agreement must consider a customer's financial circumstances and any extenuating circumstances of the household. The payment agreement may, at the discretion of the utility, contain a provision by which the utility forgives all or a portion of the amount in which the account is in arrears, which, if implemented, extinguishes individual liability for the amount forgiven.

With our Medical Affordability proposal, customers approaching but not meeting income-level eligibility criteria for energy assistance would have an opportunity to apply for an affordability credit and arrearage forgiveness specifically designed and funded for them before accumulating large balances due that threaten disconnection.

2. *Increasing Number of Customers with Medical Needs Certification*

The number of Xcel Energy certified "medical customers" has generally increased in each of the past six years.

Table 1
Medically-Certified Customers

Year	Number of Certified Medical Customers	Number of Certified Medical Customers Receiving LIHEAP
2011	1,154	1,042
2012	1,688	1,396
2013	2,407	2,007
2014	2,872	2,127
2015	3,271	1,720
2016	3,183	923
2017 YTD	3,016	1,339

The information in Table 1 above also demonstrates that, over the past several years, the percentage of medical customers that receive assistance from LIHEAP to help pay for energy costs has decreased.

Table 2
Electric Consumption

October 2015 to September 2016 Customer Electric Consumption	
Customer Category	Annual Consumption (kWh)
Residential General	8,031
LIHEAP	7,214
Low Income Discount	7,102
PowerON	9,368
Medical Certified	10,137

The tracking of electric consumption in Table 2 above shows that customers on life-sustaining equipment have higher usage levels than the general residential population as well as those currently receiving low-income energy assistance.

Table 3
Customer Arrearages

Customer Category	Average Past Due Bill	Average Past Due (60 days)
Residential General*	\$163	\$207
LIHEAP*	\$142	\$174
Low Income Discount*	\$182	\$296
PowerON*	\$183	\$245
Medical Certified**	\$1,859	\$3,127

* As of September 30, 2016

** As of June 30, 2017

Customer arrearages follow the same pattern, as shown in Table 3 above, which offers a point-in-time view. While the Company's Discount and PowerON programs serve many in the lower-income bracket, we agree with ECC⁹ that medically-certified customers are becoming a group needing particular assistance focus.

3. *Multi-Year Rate Plan*

In November of 2015 we submitted a multi-year rate plan (MYRP) pursuant to Minn. Stat. § 216B.16, subd. 19 (a)(3), in part in an effort to provide customers with predictable rate increases over a longer period of time. The Settlement, approved by the Commission in its June 12, 2017 Order, provides that rates will be adjusted according to a predetermined schedule over a four-year term, and that the Company will not request another increase go into effect until January 2020 at the earliest. Subpart (a)(3) of the statute allows that a utility submitting a multi-year rate plan "may propose tariffs that expand the products and services available to customers, including, but not limited to, an affordability rate for low-income residential customers." The Settlement reached by Parties to the rate case included a new bill payment assistance program as a modification to our Low Income Program.

C. Proposed Medical Affordability Program Components

As noted above, we propose to administrate the Medical Affordability program similarly to PowerON, in partnership with ECC, as follows:

1. *Affordability Credit*

One of the Company's goals for the Medical Affordability program is to limit the percentage of household income that qualifying customers devote to electric costs to a tiered affordability and arrears cap. Depending on the income and affordability for the household, we would limit the amount the household would pay to no more than three percent of their income.

2. *Arrearage Forgiveness*

The Medical Affordability program would require participating customers to contribute a payment toward any arrears of no more than three percent of their income (in addition to the affordability payment) in order to receive the Company's monthly credit towards a past-due balance. Based on the account balance and arrears of the household, if a customer's balance is under \$500, we would spread the arrears credit over 12 months; if the balance is over \$500 in arrears, we would spread the arrears credit over 24 months. The Company would match this arrearage payment

⁹ *In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota*, MPUC Docket No. E002/GR-15-826, Ex. 500 at 4-7 (Marshall Direct) (June 14, 2016).

each month. Pursuant to Minn. Stat. § 216B.098, subd. 5 (f), the Company might also forgive all or part of an arrears amount at the end of the plan (between 12 and 24 months), depending on an individual customer's circumstances, to make the payment plan affordable to the household.

3. *Income Eligibility*

Customers with income up to 50 percent of the state median income (SMI) guidelines currently used to determine LIHEAP eligibility for energy assistance would be eligible to participate in the Medical Affordability Program. If funds remained in a given program year, customers up to 60 percent of SMI could participate. Assistance would be made available to enrollees on a first-come/first-served basis until the program budget is exhausted.

4. *Program Funding and Cost Recovery*

The Commission has approved additional funding of \$3 million annually to our Low Income Program for Medical Affordability activity. The Company proposed¹⁰ to add the additional funding to the base Discount Program; this was refined in the approved Settlement to a separately defined Medical Affordability funding approach corresponding to the method used for PowerON. The allocation of Medical Affordability surcharge levels to customer classes is consistent with the current Commission-approved customer charge weighted allocation methodology. The amounts of the Medical Affordability at the \$3 million funding level are shown in Table 4 below.

**Table 4
Customer Bill Affordability Surcharges**

Medical Affordability Program					
Service Category	Annual Bills	Customer Charge	Customer Charge Ratio	Medical Affordability Surcharge	Medical Affordability Funding
Residential (Non LIHEAP)	13,051,540	\$8.00	1.000	\$0.19	\$2,423,825
C&I Non-Demand	1,031,800	\$10.00	1.250	\$0.23	239,522
C&I Demand	565,608	\$25.64	3.205	\$0.60	336,653
					\$3,000,000

The proposed tariff revisions show the Medical Affordability surcharges itemized along with the base and PowerON program components. The total amounts by customer class will be presented on customer bills as an affordability charge.

¹⁰ *In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota*, MPUC Docket No. E002/GR-15-826, Ex. 84 at 11-14 (Huso Direct) (November 2, 2015).

We are requesting the Commission approve a January 1, 2018 effective date for application of the Medical Affordability surcharge.

5. *Program Administration*

Because the Company currently has employees on its PAR team dedicated to managing medical and life support customer accounts, we believe we can absorb the administration of the bill payment assistance benefits to Medical Affordability program participants internally with little impact on overall labor costs. However, we would in any case propose to limit administrative costs to no more than five percent of the annual budget. Administrative costs for the overall Low Income Program for calendar year 2016 were \$257,394; this includes printing and mailing applications, internal labor and expenses along with our contract with Energy CENTS Coalition to administer the program.

Our customers certify their medical need for continued electric service by way of a "Critical Life-Sustaining Medical Equipment and Medical Emergency Form," provided as Attachment A to this filing. We would continue to use this form to document that discontinuation of service could impair or threaten the health or safety of a resident of the customer's household. General Low Income Program participation is processed using a PowerON and Gas Affordability Program Application. We have created a similar Medical Affordability Program Application form, provided as Attachment B. Attachment C is an information sheet introducing potential participating customers to the Medical Affordability program. As per PowerON, ECC would receive completed applications, combine consumption information the Company provides with income information the customer provides, and then calculate each applicant's potential Medical Affordability benefit.

6. *Reporting and Program Fund Tracking*

We propose to provide information regarding the Medical Affordability program customer participation and funding in our December 1 annual reporting to the Commission in Docket No. E002/M-04-1956 on the Company's Low Income Program activities generally, beginning with the December 1, 2018 report. We would include statistical information modeled on the PowerON reporting specifically, including customer payment frequency and history, disconnections, program credits and benefits, arrearage levels, coordination efforts with other low-income bill payment assistance and conservation resources, and participant income and usage comparisons. Additionally, we would provide information about a tracker balance and cost recovery funding for the Medical Affordability program.

D. Proposed Bill Message

The Company proposes the following language, which could be included as a bill message on the first billing after the Medical Affordability program is implemented. Below are our proposed bill messages for the three impacted customer classes:

Residential

Effective January 1, 2018, the monthly Affordability Charge on your bill increased by \$0.19 to fund an electric Low Income Energy Discount Program supplement to provide assistance to qualifying customers with certified medical circumstances.

C&I Non-Demand

Effective January 1, 2018, the monthly Affordability Charge on your bill increased by \$0.23 to fund an electric Low Income Energy Discount Program supplement to provide assistance to qualifying customers with certified medical circumstances.

C&I Demand

Effective January 1, 2018, the monthly Affordability Charge on your bill increased by \$0.60 to fund an electric Low Income Energy Discount Program supplement to provide assistance to qualifying customers with certified medical circumstances.

We propose to work with the Commission's Consumer Affairs Office to finalize the bill message in advance of our implementation of the Medical Affordability program.

E. Revised Tariff Sheet(s)

We provide our proposed revised tariff sheets in both redline and clean versions as Attachments D and E respectively, as follows:

Sheet No. 5-95, revision 9

Sheet No. 5-96, revision 10

VII. STATUTORY COMPLIANCE

As noted in Section VI.B.3. above, Minn. Stat. § 216B.16, subd. 19 (a)(3) allows that a utility submitting a multi-year rate plan may propose programs therein that expand services to customers, including an affordability rate for low-income residential customers.

We believe that the Medical Affordability program is the type of program contemplated by the statute. In addition, the program as outlined in this Petition was included in the August 16, 2016 Stipulation of Settlement by Parties, approved by the Commission in its June 12, 2017 Order in the present docket. For these reasons, we believe that this Petition is appropriate and ask the Commission to approve the Medical Affordability program as a modification to our Low Income Energy Discount Rider tariff.

CONCLUSION

We appreciate the opportunity to provide the Commission information regarding our proposal for a modification to our electric Low Income Energy Discount Program and respectfully request the Commission approve the Medical Affordability program design and planned implementation date.

Dated: August 21, 2017

Northern States Power Company

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Nancy Lange	Chair
Dan Lipschultz	Commissioner
Matthew Schuerger	Commissioner
Katie Sieben	Commissioner
John Tuma	Commissioner

IN THE MATTER OF THE APPLICATION OF
NORTHERN STATES POWER COMPANY
FOR AUTHORITY TO INCREASE RATES FOR
ELECTRIC SERVICE IN THE STATE OF
MINNESOTA

DOCKET No. E002/GR-15-826

MODIFICATION TO
LOW INCOME ENERGY DISCOUNT PROGRAM:
MEDICAL AFFORDABILITY PROGRAM PETITION

SUMMARY OF FILING

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We propose a customer bill payment assistance program named the "Medical Affordability" program exclusively for low-income customers with chronic or severe medical conditions. We are committed to expanding our affordability programming to individuals experiencing certified medical circumstances with an income level up to 50 percent of the state median income guidelines² currently used to determine eligibility for energy assistance from the federally-funded, state-administered Low Income Home Energy Assistance Program (LIHEAP). We make this proposal for an increase of \$3 million in funding to our Low Income Program in an effort to aid such customers struggling with their electric bills.

¹ Minn. Stat. § 216B.16, subd. 19 (a)(3).

² If funds remain, the program would allow customers up to 60 percent of the state median income guidelines to enroll.

FORM
MINNESOTA

MINNESOTA - XCEL ENERGY

CRITICAL LIFE-SUSTAINING MEDICAL EQUIPMENT AND MEDICAL EMERGENCY FORM

Minnesota Stat 216.B.098 Subd. 5. **Medically necessary equipment.** A utility shall reconnect or continue service to a customer's residence where a medical emergency exists or where medical equipment requiring electricity necessary to sustain life is in use, provided that the utility receives from a medical doctor written certification, or initial certification by telephone and written certification within five business days, that failure to reconnect or continue service will impair or threaten the health or safety of a resident of the customer's household. **The customer must enter into a payment agreement.**

I. CUSTOMER CERTIFICATION: (To be completed by customer)

Customer Name: _____ Account # _____

Customer Address: _____

City, State, Zip _____

Home Phone: _____ Business Phone: _____

Resident(s) requiring life sustaining medical equipment: _____ DOB: _____

Relationship to Customer: _____

II. RELEASE: (to be completed by Resident requiring life-sustaining equipment or his/her legal guardian)

I _____ (Check one resident or legal guardian) hereby grant my consent to the below-named licensed physician to release to Xcel Energy such information as noted below, plus any supplemental information regarding critical medical equipment used at the residence.

Signature of Resident or Legal Guardian: _____ Date _____

III. MEDICAL VERIFICATION: Check all that apply (To be completed and signed by one of the following: licensed medical doctor; a licensed or registered physician's assistant or nurse practitioner; or a registered nurse – but only to the extent of verifying the current diagnosis or prescriptions made by a licensed medical doctor for the customer or member of the customer's household)

- The above named customer is currently using a **LIFE-SUSTAINING** medical device(s).
- Ventilator Sleep Apnea Heart Monitor Infusion pump Feeding Pump *Other - Critical Life Sustaining
- Kidney Dialysis Oxygen Concentrator Other - Not Life Sustaining Respirator Suction

*If you have selected Other - Critical Life Sustaining, Xcel Energy requires an explanation of the Life Support equipment that is used at this residence: _____

Failure to reconnect or continue electricity service to the above named customer will impair or threaten the health or safety of a resident of the customer's household for the following reason: _____

I certify that the termination of electricity would disrupt the use of LIFE SUPPORT EQUIPMENT and/or would create a medical emergency for _____ who is a permanent resident at: _____

Licensed Medical Provider Name: _____ Title: _____

Address: _____ City _____ State _____ Zip _____

Signature: _____ Phone: _____

Please fax to 612-573-1700 or mail completed form to:

Xcel Energy Attn: PAR DEPT
3115 Centre Pointe Drive
Roseville MN 55113

Application

Minnesota



Medical Affordability Program Application

Offered by Xcel Energy and administered by the Energy CENTS Coalition

You must sign and complete this form in full to apply for this program.

Section I. Requestor Information

Please check appropriate box for service provided by Xcel Energy: Electricity Natural Gas Both

Name on account _____

Daytime phone (_____) _____ Other phone (_____) _____

Address _____ Apartment/unit number _____

City _____ State _____ ZIP _____

Xcel Energy account number

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

Your account number can be found in the lower left corner of your bill. We cannot process your application without your account number. If you do not know your account number, call us at **800.895.4999**.

Section II. Income Information

Please include income from ALL sources (except food stamps) and for ALL household members.

What is your current household income? \$ _____ per year

What was your total income for the last three months? \$ _____ last three months

How many people live in your household? _____ people

Do you own or rent your home? (Check one) Own Rent

Check the box that best describes your home:

- House Townhouse Duplex Triplex Fourplex Apartment Condominium Mobile home
 Other _____

Section III. Signatures

All adults living in your household must sign below. Please see the back of this application for important program information.

Signature: X _____ Date: _____

Signature: X _____ Date: _____

Medical Affordability Program

Application

Business Solutions Center **855.839.8862**

Minnesota

By signing this document, I am giving Energy CENTS Coalition and Xcel Energy permission to obtain information about me and I am agreeing to the following:

- I agree that I have received/qualified for Energy Assistance for the current Low Income Home Energy Assistance Program (LIHEAP) federal fiscal year, this heating season.
- I agree to allow Xcel Energy to use payment information in the evaluation of the program.
- I agree to allow the Energy CENTS Coalition to obtain account information, including LIHEAP status, from Xcel Energy necessary to process this application.
- I understand I must make my monthly bill payment in order to stay in the program, to receive credit toward past due amounts and to prevent service disconnection.
- I understand that enrollment for the program is based on a first come, first served basis.
- I agree to notify Xcel Energy if there are changes in my income, household size or if I move.
- I understand that enrollment in this program will automatically cancel my Averaged Monthly Payment enrollment or any other previously agreed upon payment plan.
- I agree to allow the Energy CENTS Coalition to share any of the above information with other organizations that provide energy assistance, conservation and other services.
- I agree to allow heating and electricity companies to give data about my account and energy use to the Energy CENTS Coalition for the Medical Affordability program and any Energy CENTS Coalition conservation programs.

Questions?

Call the **Energy CENTS Coalition** at **888.774.9070**.

Fax your application to **651.774.0445**.

Mail your application to:

Energy CENTS Coalition
823 E. 7th Street
Saint Paul, MN 55106



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Information Sheet

Minnesota



Medical Affordability Program

Higher energy costs can stretch your budget limits. Help is available from Xcel Energy and our trusted partner, the Energy CENTS Coalition, a community-based organization that promotes more affordable utility service for low- and fixed-income Minnesotans with special medical needs.

The Medical Affordability program is funded to the level of \$3 million annually and is available to medically certified, income qualified Xcel Energy residential electric customers. The program provides supplemental energy bill payment assistance customized to fit your needs. For example:

- You may receive a monthly discount on your Xcel Energy bill based on your household income, and on how much energy you use.
- If your Xcel Energy account is past due, you may receive a monthly credit to help you stay up-to-date.

Here's how the Medical Affordability program works:

- Based on your household income, you will be required to pay a set amount, based on a percentage of your income, each month for your electricity.
- Each time you make your payment, we will retire a portion of your past due amount on your bill.

Medical Affordability Program

- Customers with certified medical circumstances and an income level up to 50 percent of the Minnesota State Median Income Guidelines (SMI). Availability may be extended to qualifying customers up to 60 percent of SMI according to availability of remaining annual program funds. The Company will offer customer benefits with the objective of limiting the percentage of household income used for the cost of electricity. Customers in arrears are required to agree to a payment plan.
- You must pay your monthly Xcel Energy bill on time. If you fall behind on your payments, you will be removed from the program and ineligible to reapply until the next calendar year. You may be subject to service disconnection, as well.
- You must receive Energy Assistance program funds during the current heating season.
- You are required to notify Energy CENTS Coalition if you move or if your household income changes.
- You agree to program terms and conditions.

How to apply:

Please complete the enclosed Medical Affordability application and return it to Energy CENTS Coalition in the return envelope provided. We encourage you to apply as soon as possible as funds are limited.



Contact us:

If you have questions or would like more information, please contact Energy CENTS Coalition at **651.774.9010** (Twin Cities Metro) or at **888.774.9070** for out-state. To speak to a personal account representative at Xcel Energy, please call us at **800.331.5262**.

Northern States Power Company

Docket No. E002/GR-15-826
Medical Affordability Program Petition
Attachment D - Redline Tariff Sheets
August 21, 2017

Redline

LOW INCOME ENERGY DISCOUNT RIDER

Section No. 5
89th Revised Sheet No. 95

AVAILABILITY

Available to any residential customer who is certified and receiving assistance from the Low Income Home Energy Assistance Program (LIHEAP) during the federal fiscal year. Customers must receive certification annually through authorized LIHEAP agencies to be eligible for this discount Rider.

DISCOUNT PROGRAM

Eligible Senior and / or Disabled customers receive a \$15 discount in each monthly billing period.

PowerOn PROGRAM

Eligible Seniors and / or Disabled, and Customers Under 62 Years of Age with no Disability.

A customer using more than 3% of their annual household income for electric use may be eligible for the Company's PowerOn affordability program. The Company will offer customers with the lowest income, and a history of electric consumption that exceeds the residential average of 750 kWh per month, an affordable monthly bill. For a customer to be eligible for a supplemental reduction in their electric bill, the customer must agree to affordable monthly payments.

Medical Affordability PROGRAM

Customers with certified medical circumstances and an income level up to 50 percent of the state median income guidelines. Availability may be extended to qualifying customers up to 60 percent of the state median income guidelines according to availability of remaining annual program funds. The Company will offer customer benefits with the objective of limiting the percentage of household income at 3% for the affordability credit and at another 3% for the arrears payment used for the cost of electricity. Customers in arrears are required to agree to a payment plan to receive Company monthly credits applied over a period of 12 to 24 months, with the period determined relative to the account balance due.

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TERMS AND CONDITIONS OF SERVICE

1. The company will review current billing information, approved LIHEAP benefits and household income to make payment arrangements with the customer. A mutually agreed to payment plan will be offered to the customer and a payment schedule provided.
2. Customer must maintain an active account registered under customer's name with the Company to be eligible for this discount Rider.
3. Customers receiving assistance from LIHEAP with electric service through one meter for domestic and non-domestic purposes jointly may be eligible for this Discount Rider subject to Company's verification and approval. The Company shall determine the kWh use that is for domestic purposes. This Discount Rider only applies to kWh use for domestic purposes.

(Continued on Sheet No. 5-96)

Date Filed: ~~11-02-15~~ 08-21-17 By: Christopher B. Clark Effective Date: ~~10-01-17~~
President, Northern States Power Company, a Minnesota corporation
Docket No. E002/GR-15-826 Order Date: ~~06-12-17~~

MINNESOTA ELECTRIC RATE BOOK - MPUC NO. 2

**LOW INCOME ENERGY DISCOUNT RIDER
 (Continued)**

Section No. 5
~~9~~10th Revised Sheet No. 96

TERMS AND CONDITIONS OF SERVICE (Continued)

4. Qualified customers are only eligible to receive an energy discount under this Rider at one residential location at any one time and the discount only applies to a qualified customer's permanent primary residence. This Rider will not be available when, in the opinion of the Company, the customer's accommodation or occupancy is of temporary nature.
5. The discount shall be prospective and may not be applicable to past due bills or non-electric services.
6. An annual application and eligibility declaration is required for each request for service under this Rider. Without declaration of continuing eligibility, the discount ends in the September calendar month of each year.
7. It is the customer's responsibility to notify the Company if there is a change of address or eligibility status.
8. Discounts will be credited to the eligible customer bills one billing month after Company's receipt of notification of LIHEAP certification. The applicable discount under this Rider will be retroactive to the October billing month during that same LIHEAP fiscal year.
9. Refusal or failure of a customer or agencies to provide documentation of eligibility acceptable to the Company may result in removal from this Rider.
10. Customers may be rebilled for periods of ineligibility under the applicable rate schedule.
11. This Rider shall meet the conditions of Minnesota Statutes, Chapter 216B.16, Subd. 14 on low income discount rates.

PROGRAM SURCHARGE

Rider program costs shall be recovered in the following per month amounts, with the total surcharge as a separate line item on customer billing statements:

Service Category	Base	PowerONⁿ	Medical Affordability	Total
Residential	\$0.53	\$0.21	<u>\$0.19</u>	<u>\$0.74</u> <u>\$0.93</u>
C&I Non-Demand	\$0.71	\$0.26	<u>\$0.23</u>	<u>\$0.97</u> <u>\$1.20</u>
C&I Demand	\$2.13	\$0.66	<u>\$0.60</u>	<u>\$2.79</u> <u>\$3.39</u>

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Xcel Energy customers who receive LIHEAP assistance in the current LIHEAP year (October 1–September 30) and Lighting class service customers are exempt from paying the program surcharge.

Northern States Power Company

Docket No. E002/GR-15-826
Medical Affordability Program Petition
Attachment E - Clean Tariff Sheets
August 21, 2017

Clean

LOW INCOME ENERGY DISCOUNT RIDER

Section No. 5
9th Revised Sheet No. 95

AVAILABILITY

Available to any residential customer who is certified and receiving assistance from the Low Income Home Energy Assistance Program (LIHEAP) during the federal fiscal year. Customers must receive certification annually through authorized LIHEAP agencies to be eligible for this discount Rider.

DISCOUNT PROGRAM

Eligible Senior and / or Disabled customers receive a \$15 discount in each monthly billing period.

PowerOn PROGRAM

Eligible Seniors and / or Disabled, and Customers Under 62 Years of Age with no Disability.

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Customers with certified medical circumstances and an income level up to 50 percent of the state median income guidelines. Availability may be extended to qualifying customers up to 60 percent of the state median income guidelines according to availability of remaining annual program funds. The Company will offer customer benefits with the objective of limiting the percentage of household income at 3% for the affordability credit and at another 3% for the arrears payment used for the cost of electricity. Customers in arrears are required to agree to a payment plan to receive Company monthly credits applied over a period of 12 to 24 months, with the period determined relative to the account balance due.

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TERMS AND CONDITIONS OF SERVICE

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2. Customer must maintain an active account registered under customer's name with the Company to be eligible for this discount Rider.
3. Customers receiving assistance from LIHEAP with electric service through one meter for domestic and non-domestic purposes jointly may be eligible for this Discount Rider subject to Company's verification and approval. The Company shall determine the kWh use that is for domestic purposes. This Discount Rider only applies to kWh use for domestic purposes.

(Continued on Sheet No. 5-96)

Date Filed: 08-21-17

By: Christopher B. Clark

Effective Date:

President, Northern States Power Company, a Minnesota corporation

Docket No. E002/GR-15-826

Order Date:

MINNESOTA ELECTRIC RATE BOOK - MPUC NO. 2

**LOW INCOME ENERGY DISCOUNT RIDER
 (Continued)**

Section No. 5
 10th Revised Sheet No. 96

TERMS AND CONDITIONS OF SERVICE (Continued)

4. Qualified customers are only eligible to receive an energy discount under this Rider at one residential location at any one time and the discount only applies to a qualified customer's permanent primary residence. This Rider will not be available when, in the opinion of the Company, the customer's accommodation or occupancy is of temporary nature.
5. The discount shall be prospective and may not be applicable to past due bills or non-electric services.
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7. It is the customer's responsibility to notify the Company if there is a change of address or eligibility status.
8. Discounts will be credited to the eligible customer bills one billing month after Company's receipt of notification of LIHEAP certification. The applicable discount under this Rider will be retroactive to the October billing month during that same LIHEAP fiscal year.
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PROGRAM SURCHARGE

Rider program costs shall be recovered in the following per month amounts, with the total surcharge as a separate line item on customer billing statements:

Service Category	Base	PowerOn	Medical Affordability	Total	
Residential	\$0.53	\$0.21	\$0.19	\$0.93	N
C&I Non-Demand	\$0.71	\$0.26	\$0.23	\$1.20	TN
C&I Demand	\$2.13	\$0.66	\$0.60	\$3.39	N
					N

Xcel Energy customers who receive LIHEAP assistance in the current LIHEAP year (October 1–September 30) and Lighting class service customers are exempt from paying the program surcharge.

Date Filed: 08-21-17 By: Christopher B. Clark Effective Date:
 President, Northern States Power Company, a Minnesota corporation
 Docket No. E002/GR-15-826 Order Date:

CERTIFICATE OF SERVICE

I, Carl Cronin, hereby certify that I have this day served copies or summaries of the foregoing document on the attached list(s) of persons.

by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States Mail at Minneapolis, Minnesota

or

electronic filing

Docket No. E002/GR-15-826

Dated this 21st day of August 2017

/s/

Carl Cronin
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_15-826_Official
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_15-826_Official
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James J.	Bertrand	james.bertrand@stinson.com	Stinson Leonard Street LLP	150 South Fifth Street, Suite 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-826_Official
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Corey	Conover	corey.conover@minneapolismn.gov	Minneapolis City Attorney	350 S. Fifth Street City Hall, Room 210 Minneapolis, MN 554022453	Electronic Service	No	OFF_SL_15-826_Official
Carl	Cronin	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_15-826_Official
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Jeff	Oxley	jeff.oxley@state.mn.us	Office of Administrative Hearings	600 North Robert Street St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-826_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_15-826_Official
Byron E.	Starns	byron.starns@stinson.com	Stinson Leonard Street LLP	150 South 5th Street Suite 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-826_Official
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-826_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_15-826_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_15-826_Official
Scott M.	Wilensky	scott.wilensky@xcelenergy.com	Xcel Energy	7th Floor 414 Nicollet Mall Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_15-826_Official
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_15-826_Official
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-826_Official
Cam	Winton	cwinton@mchamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_15-826_Official
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_15-826_Official
Patrick	Zomer	Patrick.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-826_Official

CERTIFICATE OF SERVICE

I, Carl Cronin, hereby certify that I have this day served copies or summaries of the foregoing document on the attached list(s) of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States Mail at Minneapolis, Minnesota

or

xx electronic filing

Docket No. E002/GR-15-826

Xcel Energy Miscellaneous Service List

Dated this 24th day of August 2017

/s/

Carl Cronin
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_15-826_Official
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_15-826_Official
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_15-826_Official
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_15-826_Official
Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy	414 Nicollet Mall Fl 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_15-826_Official
Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_15-826_Official
Ryan	Barlow	Ryan.Barlow@ag.state.mn.us	Office of the Attorney General-RUD	445 Minnesota Street Bremer Tower, Suite 1400 St. Paul, Minnesota 55101	Electronic Service	Yes	OFF_SL_15-826_Official
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