July 21, 2021

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

RE: **Supplemental Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket Nos. G004/M-21-217, G011/M-21-224, G002/M-21-220, G008/M-21-218, and G022/M-21-221

Dear Mr. Seuffert:

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

The Annual Gas Affordability Program (GAP) Reports for:

- Great Plains Natural Gas Company
- Minnesota Energy Resources Corporation (MERC)
- Northern States Power Company (Xcel)
- CenterPoint Energy Minnesota Gas (CenterPoint)
- Greater Minnesota Gas, Inc.

The Department recommends that the Commission **accept the utilities' reports and require CenterPoint, Xcel, and MERC to temporarily expand the benefits of their programs, as specified herein.** The Department is available to answer any questions that the Minnesota Public Utilities Commission may have.

Sincerely,

/s/STEPHEN COLLINS	/s/MICHAEL N. ZAJICEK	/s/GEMMA MILTICH
Financial Analyst	Rates Analyst	Financial Analyst, CPA

MZ, SC, & GM/ja
Attachment

Before the Minnesota Public Utilities Commission

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

Docket Nos. G004/M-21-217, G011/M-21-224, G002/M-21-220,
G008/M-21-218, and G022/M-21-221

I. INTRODUCTION

Gas Affordability Programs (GAPs) are governed by Minnesota Statutes §216B.16, Subdivision 15, and are designed to reduce the proportion of income that low-income customers dedicate to paying their energy bills. On March 31, 2021, five natural gas utilities with a GAP submitted their annual 2020 reports (the 2020 GAP Reports, collectively) in the following dockets:

- Great Plains Natural Gas Company (Great Plains), G004/M-21-217
- Minnesota Energy Resources Corporation (MERC), G011/M-21-224
- Xcel Energy Gas (Xcel), G002/M-21-220
- CenterPoint Energy Minnesota Gas (CenterPoint), G008/M-21-218
- Greater Minnesota Gas, Inc. (GMG), G022/M-21-221

On June 4, 2021 the Minnesota Department of Commerce, Division of Energy Resources (Department) submitted initial Comments in response to the Commission's April 16, 2021 Notice of Comment Period. The Department's June 4, 2021 Comments included our preliminary recommendations on the 2020 GAP Reports and requested additional information from certain utilities. Great Plains, Xcel, CenterPoint, and Energy CENTS Coalition (ECC) filed Reply Comments on June 14, 2021. On June 28, 2021, MERC filed Reply Comments. GMG did not file Reply Comments. The Department has reviewed the responses of and the additional information provided by the applicable utilities in their respective Reply Comments in the 2020 GAP Report dockets.

The Commission issued a Notice of Supplemental Comment Period on June 21, 2021, opening up the following topic areas for comment:

- Should the Commission accept the natural gas utilities' 2020 Gas Affordability Program (GAP) annual reports?

- Should the Commission approve CenterPoint Energy's request to increase its surcharge rate to \$0.00264 per therm from \$0.00236 per therm?

- Should the Commission authorize CenterPoint Energy to reduce payment requirement from 6% to 3% of its participating customers' income?

- Should the Commission allow Xcel Energy to reduce payment requirement from 4% to 3% of its participating customers' income?

- Should the Commission allow MERC to temporarily suspend the $750,000 annual spending cap for 2021?

- Are there other issues or concerns related to this matter?

In the instant Supplemental Comments, we offer our response, including our final conclusions and recommendations, to the Commission's June 21, 2021 Notice of Supplemental Comment Period.

II. DEPARTMENT ANALYSIS

In the following sections, the Department addresses each of the Commission's questions included in its June 21, 2021 Notice of Supplemental Comment Period.

A. SHOULD THE COMMISSION ACCEPT THE NATURAL GAS UTILITIES' 2020 GAS AFFORDABILITY PROGRAM (GAP) ANNUAL REPORTS?

Consistent with our initial June 4, 2021 Comments in the instant dockets, the Department continues to conclude that the 2020 GAP Reports comply with the applicable reporting requirements. The Department recommends that the Commission accept the 2020 GAP Reports.

B. SHOULD THE COMMISSION APPROVE CENTERPOINT ENERGY'S REQUEST TO INCREASE ITS SURCHARGE RATE TO $0.00264 PER THERM FROM $0.00236 PER THERM?

Consistent with our initial June 4, 2021 Comments in the instant dockets, the Department continues to agree with CenterPoint's assessment of its GAP surcharge rate and the need to adjust the surcharge upward in order to reach a GAP tracker balance near zero by December 2022. The Department recommends that the Commission approve CenterPoint's request to adjust its GAP tracker surcharge rate.

C. SHOULD THE COMMISSION AUTHORIZE CENTERPOINT ENERGY TO REDUCE PAYMENT REQUIREMENT FROM 6% TO 3% OF ITS PARTICIPATING CUSTOMERS' INCOME?

The Department's initial June 4, 2021 Comments noted that CenterPoint proposed to reduce the GAP participant payment requirement from 6% to 3% of the GAP participant's income by calculating the affordability credit as one-twelfth of the difference between CenterPoint's estimate of the customer's annual gas bill and 2% of the customer's household income, as compared to the current comparison to 4% of the customer's household income, and calculating the credit to retire participant arrears over 12 months with a customer contributing no more than 1% of their household income, as compared to the current 2% of the customer's income. The Department requested that CenterPoint provide in reply comments data projecting the overall change in cost of the GAP program based on these changes.

Additionally, the Company requested permission to remove the overall program spending cap due to uncertainty as to the number of customers that may seek to participate in the GAP following the resumption of disconnection activity. The Department's initial Comments noted that CenterPoint has generally had high administrative costs for its GAP program, 10.9% of total program costs, well above the 5% recovery cap, and removal of the cap and increases in spending could allow CenterPoint to recover more of its costs.

On June 14, 2021 ECC filed Comments with the Commission recommending approval of the Company's proposal to reduce the payment requirements but recommending that the Commission not remove CenterPoint's spending cap. ECC echoed the Department's concerns that it could allow CenterPoint to recover additional administrative costs.

On June 14, 2021 CenterPoint filed Reply Comments addressing the Department's concerns. CenterPoint notes that the proposed changes are to assist customers as CenterPoint transitions back to normal collections and disconnection activities in the coming months. CenterPoint provided a table estimating what GAP spending would have been for 2020 if the increased benefits were in effect, assuming no additional customers, shown in the following table:

Table 1: Estimated 2020 Spending with Increased Arrearage and Forgiveness Benefits for CenterPoint

Actual 2020 GAP Spending	*Estimated 2020 GAP Spending with Increased Benefits*	*Increase*
$3,671,320	$4,370,138	$698,818

CenterPoint notes that 2020 was an unusual year as it was not disconnecting customers for the majority of the year, and fewer customers may have enrolled in GAP because of this, while other customers may not have been removed from the GAP for failing to meet the spending requirements as in previous years. CenterPoint projects that 2021 and 2022 will be similarly unusual years due to the continued freeze of disconnections, followed by the resumption of disconnection activity. CenterPoint additionally notes that it regularly spends above its administrative cost cap, writing off the costs above the cap, and likely will increase its administrative spending in 2021 and 2022 to increase outreach as it transitions back to normal disconnection practices.

Additionally, CenterPoint discusses its proposed removal of its spending cap, noting that CenterPoint has not had trouble staying under its $5,000,000 budget, but that when disconnection activities resume it is possible that there could be significantly higher demand for the program. The Company specifies that this proposal is not directly tied to its proposal to increase arrearage and forgiveness benefits.

The Department reviewed CenterPoint's Reply Comments and agrees that increasing benefits to customers would be helpful during the recovery from the COVID-19 pandemic, and the increase in costs does not appear to be excessive. Therefore, the Department recommends that the Commission approve CenterPoint's proposal to reduce the payment requirement from 6% to 3% of its participating customers income. Additionally, the Department recommends that the Commission require CenterPoint to include a discussion in its next GAP filing on whether the payment requirement should return to the 6% level or remain at 3%.[1]

Finally, the Department agrees with CenterPoint that the amount of people applying for GAP may increase as disconnections resume. While the Department continues to be concerned with the high administrative costs CenterPoint incurs, the Department notes that, with the increased benefits, additional applications for GAP could push the program to is spending cap. As such, the Department agrees that a temporary removal of the spending cap may be warranted.

Therefore, the Department recommends that the Commission approve CenterPoint's proposal to remove the spending cap and require CenterPoint to discuss whether or not to reimplement the spending cap in future GAP filings, until such time as the spending cap is put back in place.

D. SHOULD THE COMMISSION ALLOW XCEL ENERGY TO REDUCE THE PAYMENT REQUIREMENT FROM 4% TO 3% OF ITS PARTICIPATING CUSTOMERS' INCOME?

The Department's initial June 4, 2021 Comments noted that Xcel proposed to modify the affordability credit to limit participants' bills to 3% of household income, from the current 4% level. This proposal would be a temporary change, in significant part to reduce Xcel's ballooning tracker balance of over $2 million at the time of Xcel's initial filing.

If the Commission approves the corresponding tariff change, Xcel would then "monitor the impact" in order "to determine if this change is sustainable." Specifically, if "the tracker balance becomes too low in the future," then Xcel would "assess whether to increase the income threshold to its former level or adjust the surcharge rate in order to be able to keep offering the increased credit amount to participants."

The Department's initial Comments did not oppose this proposal in general. However, the Department requested that Xcel, in Reply Comments:

- Provide data projecting what the overall change in the cost of the GAP would be if these changes were made—specifically, if these changes were made in the previous year, what would the impact on overall spending have been on the current report; and

[1] Unlike Xcel and MERC, which have large positive tracker balances, CenterPoint has a large negative tracker balance (see Table 1 of the Department's initial June 4, 2021 Comments).

- Describe any long-term changes to Xcel's $2.5 million spending cap that would be needed if Xcel's proposal is approved.

Xcel's Reply Comments estimate that, under a 3%-threshold affordability credit, the average annual benefit per participant would have increased by $130. At 2020's participant level of 5,022 households, the total increase in spending/benefits, solely accounting for existing participants under the 4% threshold, would have been $652,860. However, Xcel estimates that if the threshold had been 3%, an additional 800 households would have qualified for the program with an estimated $100 annual benefits. Including these additional households would result in a total additional spend/benefit amount of $732,860. However, not all households that qualify will also enroll. In addition, changing the threshold and thus required payments will likely result in less existing GAP customers being kicked off the program. Finally, 2020 enrollment was affected by the pandemic and the resulting suspension of disconnections and collection activity.

Given these additional effects, the Department concludes that the additional annual spending resulting from a 3% threshold would be around $700,000 to $800,000. As a result, Xcel estimates that it would take about 3 years to eliminate the tracker balance under the temporary 3% threshold.

Xcel's Reply Comments clarify that this temporary change would not require Xcel to change its $2.5 million spending cap, because Xcel's GAP tariff allows spending to exceed the GAP with tracker balance funds. Xcel also notes that, historically, it has spent less than $2.5 million each year, which presumably has been one reason for the positive tracker balance.

Finally, Xcel agreed with the Department that it would need to make an additional tariff change to reflect the 3% threshold, if approved.

ECC's Reply Comments also address Xcel's proposed changes. ECC supports Xcel's proposal.

Given (a) the average cost to other customers of $4 a year under the current surcharge, (b) the effects of the pandemic, and (c) Xcel's ballooning tracker balance, the Department concludes that it is reasonable to modify Xcel's affordability credit to a 3% threshold on a temporary basis, while keeping the existing surcharge intact. The Department recommends that the Commission approved Xcel's proposed tariff modification, as clarified in Xcel's Reply Comments, until the tracker balance goes below $50,000. At that time, Xcel would then need to file a proposal in its next scheduled GAP filing on whether to revert the threshold to 4%, maintain the threshold at 3%, or move the threshold to a different level.

Since the change is temporary and in significant part due a large unusual shock (the pandemic), the default consideration would be to revert the threshold back to the 4% level. However, an appropriate outcome at the time may be whatever affordability credit would best allow Xcel to achieve a zero tracker balance under the existing surcharge.

E. SHOULD THE COMMISSION ALLOW MERC TO TEMPORARILY SUSPEND THE $750,000 ANNUAL SPENDING CAP FOR 2021?

Like Xcel, MERC has also experienced a ballooning tracker balance, which is about as high as Xcel's at an absolute level, but, on a relative level, significantly higher, given that MERC's annual budget is less than 40% of Xcel's ($750,000 versus $2 million). Correspondingly, MERC's $0.00905 per therm surcharge is about twice as high as Xcel's $0.00445 surcharge, and is, overall, on the high side compared to all five gas utilities (see Table 1 in the Department's initial June 4, 2021 Comments).

To address this issue, MERC's initial report contemplated making a proposal in its next GAP evaluation report due May 31, 2022. MERC also requested that the Commission allow MERC to temporarily suspend MERC's $750,000 spending cap.

The Department's initial Comments did not oppose MERC's proposals. However, the Department stated that it would prefer that MERC be timelier in managing its tracker balance, especially given their above average surcharge level.

The Department requested that MERC provide in Reply Comments:

- Initial thoughts on how to address the tracker balance—for example, MERC could reduce the surcharge, increase program benefits, or both; and

- Further explanation of the high negative arrearage balance per participant and, in particular, how the negative balance is consistent with the arrearage forgiveness terms in MERC's GAP tariff, which the Department understands require that arrearage forgiveness payments end once a customer is no longer in arrears.

In its Reply Comments, MERC:

- Confirmed that its tariff language requires removing the spending cap in order for MERC to spend above $750,000 per year.

- Committed to report in MERC's 2021 GAP Annual Report (to be filed in March 2022) any unusual enrollment trends due to pandemic-related factors.

- Stated that it was open to modifying the program affordability credit from 6% to 3%. However, to implement this change, MERC stated that it would require assistance from external sources to obtain current income information for all approximately 1,100 GAP participants. Once the required information is gathered, the Company estimated that it would take approximately 6-9 months to process the information for all of the GAP participants.

- Proposed using approximately half of the tracker balance to, at the end of March 2022, do a one-time full elimination of arrearage balances for customers who have qualified for LIHEAP in 2019 and 2020 or have currently been approved for LIHEAP and have arrearage balances greater than $100.

Regarding the arrearage issue:

- MERC stated that the negative $1,050 per participant arrearage balance was due to the application of affordability credits and energy assistance payments. MERC confirmed that once a customer's arrears are paid off through a combination of arrearage forgiveness credits and customer payments, the arrearage forgiveness benefit terminates. However, MERC stated that a customer who qualifies for and receives LIHEAP can remain enrolled in GAP after paying down their account arrears and that these customers continue to receive affordability credits and energy assistance payments. MERC states that when energy assistance payments plus affordability credits exceed a customer's monthly utility bill, the customer then accumulates a credit balance on their account.

- MERC proposed a one-time reallocation of the negative arrearage balances (credits) of GAP participants to pay down non-GAP, LIHEAP customers' arrearage balances. MERC stated that there are currently 475 GAP accounts that have credit balances over $500, totaling approximately $1.2 million. By coincidence, this amount is almost equal to the $1.1 million arrearage balance for customers who currently qualify for LIHEAP or have qualified for LIHEAP in 2019 or 2020 and have arrearage balances greater than $100.

MERC stated that this proposal of applying the account credit balances of GAP participants to pay down other non-GAP LIHEAP customers' arrearage balances and the proposal to utilize a portion of the GAP tracker balance to pay down non-GAP LIHEAP customers' arrearage balances have the same goal of reducing LIHEAP customers' arrears balances. Therefore, the Commission would only need to approve one of these proposals.

While the Department appreciates MERC's proposals to address the high tracker balance and account credits, the Department remains concerned how MERC got here in the first place. It is notable that no other utility has such a high tracker balance relative to its participation level. Likewise, no other utility has a negative average arrearage balance (see Table 3 in the Department's initial June 4, 2021 Comments).

Whatever the exact billing details, it appears that MERC is using the affordability credits and energy assistance payments to build up large credits (negative arrearage balances) for customers without arrears. The Department recommends that the Commission require MERC to ensure that its affordability credits and energy assistance payments are only applied as a reduction to customer's bills and/or positive arrearage balances. Therefore, if a customer has $0 bill after a portion of the affordability credit and energy assistance is used up, any remaining energy assistance or affordability credits would only be applied to any past-due balance. If the customer has no past-due balance, the remaining amounts would be not be applied for the month.[2]

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[2] MERC states that in some cases customers are receiving an affordability credit that exceeds their monthly bill due to a billing issue with MERC's forecast of the cost of gas. MERC's GAP tariff states that the affordability component "consists of a bill credit determined as one-twelfth of the difference between MERC's estimate of the Qualified Customer's annual gas bill and 6% of the Qualified Customer's household income as provided by

If applicable, the Department also recommends that MERC apply any existing negative arrearage balance as an immediate credit to the applicable customers' bills until the credit is used up. If MERC cannot fully apply the negative arrearage balance over a 12-month period, for issues such as a customer leaving MERC's service territory, MERC should add the credit to the tracker balance, where the funds can be applied to other customers. As a result, the Department also recommends that the Commission reject MERC's proposal to take certain customer credits and directly reallocate them to other customers.

In addition, the Department recommends that the Commission also reject MERC's alternative proposal to use about $1.1 million of the tracker balance as a one-time credit to eliminate existing customer arrears. While the Department appreciates the desire to eliminate customer arrears, particularly for customers in unfortunate circumstances, the Department does not believe a one-time reduction is an optimal solution. Instead, the Department believes it would be more effective to use the $1.1 million and remainder of the tracker balance to increase affordability credits. Arrearage forgiveness would then continue to be addressed through the existing mechanism.

Therefore, the Department recommends that the Commission require MERC to, as soon as possible, reduce the affordability threshold to 3% until the tracker balance is under $50,000, at which point MERC would then be required to submit, in its next scheduled GAP filing, a proposal regarding 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. This would be identical to the temporary change applied to Xcel's GAP.

F. ARE THERE OTHER ISSUES OR CONCERNS RELATED TO THIS MATTER?

Consistent with our June 4, 2021 Comments in the instant dockets, the Department continues to support the following miscellaneous conclusions and recommendations regarding Great Plains' GAP reporting requirements:

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the Qualified Customer to MERC." In the 2020 program year, MERC's average annual bill per participant was $655 and average annual affordability benefit per participant was $443. If one assumes MERC's estimated average annual bill per participant was $700, then the $443 annual credit would be designed to limit the payment after affordability credit to $257. At the 6% threshold, this would imply an annual average participant household income of $4,300 ($257 divided by 6%).

Using these numbers, for the affordability credit to exceed the bill would require quite a large forecasting error by MERC. At an annual household income is $4,300, forecasted bill of $700 a year, and affordability credit of $257, for the affordability credit to exceed the actual bill would require the actual to bill to be less than $257, versus the $700 forecast.

According to the U.S. Census, in 2019 3% of households had an income under $5,000. In the West North Central region (Iowa, Kansas, Minnesota, Missouri, Nebraska, North Dakota, and South Dakota), the total number of households with an income under $5,000 was 170,000, or 2% of households. (Source: https://www2.census.gov/programs-surveys/cps/tables/hinc-01/2020/hinc01_1.xlsx)

- The Department concludes that (1) Great Plains reports its actual GAP participation rate as a part of the reporting requirements applicable to all gas utilities with a GAP and (2) comparing the actual GAP participation rate to the five percent participation rate estimated in 2008, prior to the approval of Great Plains' GAP, no longer provides useful insights. The Department recommends that (1) Great Plains continue to report in its annual GAP filings the percentage of LIHEAP customers that participate in GAP, just as the Company has done in prior years, and (2) the Commission discontinue the requirement that Great Plains provide an evaluation comparing the actual GAP participation rate to the estimated five percent participation rate assumed in Docket No. G004/M-07-1235.

- The Department concludes that (1) Great Plains reports its actual GAP cost and participant count as a part of the reporting requirements applicable to all gas utilities with a GAP and (2) comparing the actual average annual GAP cost per participant to the $555 assumption estimated in 2008, prior to the approval of Great Plains' GAP, no longer provides useful insights. The Department recommends that (1) Great Plains continue to report in its annual GAP filings the actual annual GAP costs and number of GAP participants, just as the Company has done in prior years, and (2) the Commission discontinue the requirement that Great Plains provide an evaluation comparing the actual average annual GAP cost per participant to the assumed $555.

- Consistent with our conclusions on the relevance of Great Plains providing comparisons between the actual and previously estimated GAP participation rates and costs, the Department concludes that it no longer provides useful insights for Great Plains to report its conclusions on these comparisons. While the Department recognizes that Great Plains needs to assess its GAP costs and participation in order to make reasonable GAP budget and surcharge proposals, we do not believe that the reporting requirement in Point 4 of the Commission's May 12, 2008 *Order* in Docket No. G004/M-07-1235 is necessary to prompt Great Plains to perform such assessments. Rather, the Department believes that Great Plains' assessment of its GAP costs/participation is inherent to Great Plains' operation of its GAP and any associated proposals to adjust the GAP budget/surcharge. Therefore, the Department recommends that the Commission discontinue the requirement that Great Plains provide conclusions regarding the evaluation data required per Points 2 and 3 of the Commission's May 12, 2008 *Order* in Docket No. G004/M-07-1235.

Additionally, the Department continues to support the following recommendation, which we discussed in our June 4, 2021 Comments:

- Each utility noted in its report the impacts of the pandemic on their GAP. In general, there tended to be lower participation in GAP in 2020, which utilities estimated was due to the moratorium on disconnections. It is possible that in the second half of this year, there may be increased interest in GAP, for at least three possible reasons: 1) increased funding and eligibility for LIHEAP; 2) the resuming of disconnections; 3) higher arrearages for some customers. CenterPoint proposes to remove the spending cap on its program, citing uncertainty on GAP enrollment; it also commits to reporting on the topic in March 2022. The Department recommends that each utility make similar reports if they see unusual enrollment trends due to pandemic-related factors.

III. DEPARTMENT CONCLUSIONS AND RECOMMENDATIONS

The Department recommends that the Commission:

- Accept the natural gas utilities' 2020 GAP Reports.

- In the future annual GAP reports to be filed in March of 2022, require each utility to report on their observations of any unusual GAP enrollment trends that could be caused by pandemic-related factors.

- For CenterPoint:

    - Approve CenterPoint's request to increase its surcharge rate to $0.00264 per therm from $0.00236 per therm.
    - Approve CenterPoint's proposal to reduce the payment requirement from 6% to 3% of its participating customers' income.
    - Require CenterPoint to include a discussion in its next GAP filing on whether the payment requirement should return to the 6% level or remain at 3%.
    - Approve CenterPoint's proposal to remove the spending cap for its GAP program.
    - Require CenterPoint to discuss whether or not to reimplement the spending cap in future GAP filings, until such time as the spending cap is put back in place.

- For Xcel:

    - 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 in its next scheduled GAP filing on whether to revert the threshold to 4%, maintain the threshold at 3%, or move the threshold to a different level.

- For MERC:

    - Approve MERC's proposal to temporarily suspend the $750,000 annual spending cap until a permanent modification to its 3% threshold is approved.
    - Require MERC to ensure that its affordability credits and energy assistance payments are only applied as a reduction to customer's bills and/or positive arrearage balances.
    - If applicable, require MERC to apply any existing negative arrearage balance as an immediate credit to the applicable customers' bills until the credit is used up. If MERC cannot fully apply the negative arrearage balance over a 12-month period, for issues such as a customer leaving MERC's service territory, MERC should add the credit to the tracker balance, where the funds can be applied to other customers.

  - Reject MERC's proposal to take certain customer credits and directly reallocate them to other customers.
  - Reject MERC's alternative proposal to use about $1.1 million of the tracker balance as a one-time credit to eliminate existing customer arrears.
  - Require MERC to, as soon as possible, reduce the affordability threshold to 3% until the tracker balance is under $50,000, at which point MERC would then be required to submit, in its next scheduled GAP filing, a proposal regarding 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.

- For Great Plains:

  - Discontinue the reporting requirement in Point 2 of the Commission's May 12, 2008 *Order* in Docket No. G004/M-07-1235, which stipulates that Great Plains provide in its annual GAP reports "…an evaluation of the assumed GAP participation rate of five percent in light of actual participation in the Program." Note that, per the annual reporting requirements applicable to all utilities with a GAP, Great Plains would continue to report, as it has in prior years, the percentage of LIHEAP customers that participate in GAP.

  - Discontinue the reporting requirement in Point 3 of the Commission's May 12, 2008 *Order* in Docket No. G004/M-07-1235, which stipulates that Great Plains provide in its annual GAP reports "…the actual annual average cost per participant for the Program, and…a discussion concerning any deviation of the actual annual average cost per participant compared to the assumed average annual cost per participant of $555." Note that, per the annual reporting requirements applicable to all utilities with a GAP, Great Plains would continue to report, as it has in prior years, the actual annual GAP costs and number of GAP participants.

  - Discontinue the reporting requirement in Point 4 of the Commission's May 12, 2008 *Order* in Docket No. G004/M-07-1235, which stipulates that requires that Great Plains provide in its annual GAP reports "…the Company's conclusion regarding the reported evaluation data, together with the Company proposal concerning the GAP on a going forward basis." The "evaluation data" cited in the preceding quote refers to the reporting requirements per Points 2 and 3 of the Commission's May 12, 2008 *Order* in Docket No. G004/M-07-1235, which the Department is also recommending that the Commission discontinue.

/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
Supplemental Comments

Docket No. G004/M-21-217, G011/M-21-224, G002/M-21-220, G008/M-21-218, G022/M-21-221

Dated this 21st day of July 2021

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-217_M-21-217
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-217_M-21-217
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St Bismarck, ND 58501	Electronic Service	Yes	OFF_SL_21-217_M-21-217
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-217_M-21-217
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-217_M-21-217
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-217_M-21-217

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-218_M-21-218
Brenda A.	Bjorklund	brenda.bjorklund@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-218_M-21-218
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-218_M-21-218
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_21-218_M-21-218
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-218_M-21-218
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-218_M-21-218
Robert	Harding	robert.harding@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-218_M-21-218
Amber	Lee	Amber.Lee@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-218_M-21-218
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-218_M-21-218
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-218_M-21-218
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-220_M-21-220
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-220_M-21-220
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-221_M-21-221
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-221_M-21-221
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-224_M-21-224
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