



414 Nicollet Mall  
Minneapolis, Minnesota 55401

March 31, 2021

—Via Electronic Filing—

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

RE: ANNUAL REPORT & REQUEST FOR TARIFF MODIFICATION  
GAS AFFORDABILITY PROGRAM  
DOCKET NO. G002/M-21-\_\_\_\_\_

Dear Mr. Seuffert:

Enclosed for filing is our Gas Affordability Program Annual Report for 2020. We submit this Report pursuant to our Natural Gas Low Income Energy Discount Rider Tariff and various Commission Orders in Docket Nos. G002/GR-06-1429 and G002/M-16-493. In conjunction with this filing, we are also requesting a tariff change that is intended to increase total credits paid to participants in the Gas Affordability Program. We are submitting this report as a new miscellaneous tariff filing as requested by the Commission's November 26, 2014 Order in Docket No. G002/GR-06-1429.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list.

Please contact Martha Hoschmiller at [martha.e.hoschmiller@xcelenergy.com](mailto:martha.e.hoschmiller@xcelenergy.com) / 612-330-5973 or me at [bridget.dockter@xcelenergy.com](mailto:bridget.dockter@xcelenergy.com) / 612-337-2096 if you have any questions regarding this filing.

SINCERELY,

/s/

BRIDGET DOCKTER  
MANAGER, POLICY AND OUTREACH

Enclosures  
c: Service List

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF NORTHERN STATES  
POWER COMPANY'S 2020 ANNUAL GAS  
AFFORDABILITY PROGRAM REPORT AND  
PROPOSED TARIFF MODIFICATION

DOCKET NO. G002/M-21-\_\_\_\_  
**ANNUAL REPORT & REQUEST  
FOR A TARIFF MODIFICATION**

**INTRODUCTION**

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Annual Report regarding our Gas Affordability Program (GAP or the Program) for 2020. We submit this Report pursuant to our Natural Gas Low Income Energy Discount Rider Tariff and various Commission Orders issued in Docket No. G002/GR-06-1429, as well as the May 22, 2017 and September 28, 2018 Orders issued in Docket No. G002/M-16-493.

Due to the COVID-19 pandemic and associated financial downturn, we have had an unprecedented year for past due accounts. We discuss impacts of the financial downturn throughout the report.

In addition, we propose a tariff modification designed to increase total credits paid to all participants by lowering the percentage of a participant's qualified income they are required to pay. This update will increase each participant's benefit and serve to decrease our GAP tracker balance. The proposal is discussed in detail in Section V.

We respectfully request the Commission:

- accept our 2020 Annual Report and
- approve the proposed tariff modification to lower the percentage of qualified income that participants are required to pay.

## ANNUAL REPORT

Our Annual Report is structured as follows:

- I. Program Description
- II. Program Funding and Administration Costs
- III. Payment Frequency, Disconnections, and Arrears
- IV. Participation and Application Rates, Retention, Satisfaction, and Collection Activity
- V. Proposed Tariff Modification

We provide the 2020 GAP Tracker as Attachment A to this Report.

### **I. PROGRAM DESCRIPTION**

GAP is designed to lower the percentage of income that low-income households must use to pay current energy bills and to increase the number of customer payments while also providing a mechanism for assisting customers in paying off arrearage balances. In this effort, the Company partners with Energy CENTS Coalition (ECC) on both outreach and administration of the Program.

We proposed our Program in November 2006 in our natural gas general rate case in compliance with Minn. Stat. § 216B.16, subd. 15. GAP was approved by the Commission in the September 10, 2007 Order in Docket No. G002/GR-06-1429. The Program was implemented on February 1, 2008 in conjunction with final rates.

Effective December 26, 2009, we reduced the household income threshold dedicated to utility costs of our Program from six to four percent, in accordance with the Commission's November 18, 2009 Order.

The Commission's January 20, 2012 Order approved the use of excess tracker funds to supplement benefits in that year unless otherwise ordered by the Commission, and we updated our GAP tariff to specifically allow for use of excess tracker funds in future Program years.

On June 1, 2012, we submitted our Evaluation Report of the first four years of the pilot Program. In its October 26, 2012 Order, the Commission accepted our evaluation and extended the pilot Program for four years (until December 31, 2016) with some Program changes and additional reporting requirements. In addition, the Commission approved a reduction in the GAP surcharge from \$0.00445 per therm to \$0.00400 per therm, effective January 1, 2013 in order to reduce the GAP Tracker balance.

We submitted our next four-year Evaluation Report on May 31, 2016 in Docket No. G002/M-16-493. The Commission's May 22, 2017 Order in that docket accepted our evaluation, removed the expiration date from the program, and approved our request to return the monthly GAP surcharge to its former level of \$0.00445 per therm. In compliance with that Order, this report reflects both the non-GAP Low Income Home Energy Assistance Program (LIHEAP) and pre-program baseline methodologies for measuring the Program's disconnections, payment frequency, and arrears. The September 28, 2018 Order in the evaluation docket approved a streamlined reporting format as proposed by the Utility Stakeholder Group.

We submitted our most recent four-year Evaluation Report on May 31, 2019 in Docket No. G002/M-19-380. The Commission's January 17, 2020 Order in that docket accepted our evaluation and required our next evaluation report be filed on May 31, 2022.

#### **A. Program Eligibility**

The GAP is available to any Minnesota Xcel Energy residential natural gas customer who is certified by and receiving assistance from LIHEAP during the Program year.

Certified customers must agree to be placed on a levelized payment plan and schedule. Participants are automatically removed from the Program after a non-payment period of 60 days. To prevent this scenario, we proactively call participants after 30 days of non-payment to remind them that they will be removed from the Program if they exceed 60 days in arrears. If participants are removed from the Program for non-payment, they are not eligible for re-enrollment until the next Program year.

#### **B. Discount Structure**

The Program includes an *Affordability* component that currently limits enrolled customers' payments to four percent of their household income. The Program also has an *Arrearage Forgiveness* component that applies a monthly matching credit to the customer's balance after payment is received.

##### *1. Affordability*

The Affordability component consists of bill credits that are determined by calculating the difference between the Company's estimate of the customer's annual natural gas bill, and four percent of the customer's household income. We apply one-twelfth of this amount to the customer's account each month of the Program year. As discussed

in more detail in Section V below, we propose to reduce the percentage of household income from four to three percent.

## 2. *Arrearage Forgiveness*

The Arrearage Forgiveness component is a credit that we apply to the customer's account each month after receiving the customer's payment. We calculate the arrearage forgiveness credit by dividing the total arrears by up to 24 months, with a goal of retiring pre-program arrears over the period.

The Affordability and Arrearage Forgiveness credits are both Program costs that are included in the GAP tracker (see Attachment A for details).

## C. **Customer Payments**

To determine the levelized Program payment amount for participants, ECC uses current billing amounts and consumption, approved LIHEAP benefits, and household income information. The determined levelized payment amount includes the participant's current month's bill (one-twelfth of the levelized payment plan) and a portion of the participant's pre-Program arrears.

Program participants paid a total of \$8,240,873 toward their energy costs during the 2020 Program year.<sup>1</sup> The average per participant payment amount was \$89 per month. We calculated this number by dividing total participant payments of \$8,240,873 by the overall participation count of 7,683. This equals \$1,073 annually per participant, which divided by 12 months, equals an average of \$89 per GAP participant per month. The average monthly GAP participant payment amount decreased slightly compared to 2019, when the average monthly GAP participant payment amount was \$91.

Our detailed discussion in Section III below includes the impact of the economic downturn.

## D. **Program Year Enrollment**

In 2020, we managed participation in the Program based on the tracker balance available and customer eligibility. A total of 7,683 Xcel Energy customers participated in GAP at some point during the 2020 program year, compared to 9,675 in 2019.

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<sup>1</sup> This number reflects participant payments only and does not include any additional payments received by the Company from LIHEAP on behalf of the participant.

## II. PROGRAM FUNDING AND ADMINISTRATION COSTS

We provide as Attachment A to this filing our GAP tracker, which is also summarized in Table 1 below:

<b>Item</b>	<b>Amount</b>
Tracker Balance as of December 31, 2019	\$1,429,657
Affordability & Arrearage Forgiveness Credits	\$1,810,323
Administrative Program Costs	\$121,867
Program Collections (per therm charge)	\$2,760,447
Tracker Balance as of December 31, 2020	\$2,257,914

### A. Program Funding

The Program is funded by a per therm charge collected from all residential and most business customers. For 2020, the per therm charge was set at \$0.00445. In 2020, the average cost for a residential customer using 900 therms of gas per year was approximately \$4.01, or \$0.33 per month.<sup>2</sup>

### B. Program Administration Costs

As shown in Table 1, our total Program costs for 2020 were \$1,932,190 (the Affordability and Arrearage Forgiveness Credits plus the Program Administrative Costs). Our total Program Administration costs for the 2020 Program year were \$121,867. Our overall program to-date administration costs percentage is slightly above the allowed 5 percent cap.

Our Program Administration costs decreased slightly from 2019, but due to the economic downturn caused by the pandemic the Program credits issued decreased dramatically. This led to our Program Administration costs being a greater percentage of total Program costs than last year, despite being a smaller dollar amount. We believe the tariff change proposed below will help increase the Affordability and Arrearage Forgiveness Credits thereby getting the administration costs more in line with the program cap. We will continue to monitor our program expenses closely and provide an update in next year's Annual Report.

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<sup>2</sup> On average, an Xcel Energy residential natural gas customer in 2020 used 871 therms of natural gas, which means the program cost per customer was \$3.88 annually, or \$0.32 per month.

### **C. Tracker Balance**

The amount of Program credits we issued in 2020 decreased dramatically from 2019 causing a higher tracker balance at the end of 2020. This is largely a result of the COVID-19 pandemic. In March 2020, we suspended disconnections and began waiving late fees for residential customers. We also increased our activities to work with customers and set them up on payment plans. However, with financial struggles resulting from the pandemic and no imminent threat of disconnection, many customers have either not contacted us about resources and payment plans or they have had difficulty staying current with those that were established. To receive credits through the GAP, customers must be current on their payment arrangements. As a result, the tracker balance at the end of 2020 is higher than at the end of 2019.

Lower 2020 participation in the GAP and LIHEAP program directly ties to the lower spending in the Program. The result is a higher tracker balance. As with our customer interaction experience in 2020, we have tried outreach through targeted call campaigns, mailings, and social media – but with the disconnection moratorium in place, we are not seeing a sense of urgency for customers to apply.

We discuss in Section V below our proposal to decrease the income percentage participants are required to pay, which we believe will draw down the tracker balance by both increasing participation and increasing individual credit amounts.

### **III. PAYMENT FREQUENCY, DISCONNECTIONS AND ARREARS**

Below we provide the information required by Order Point No. 4 of the Commission's November 18, 2009 Order in Docket No. G002/GR-06-1429. Per Order Point No. 2 of the Commission's May 22, 2017 Order in Docket No. G002/M-16-493, we present the required information relating to customer payments, arrears and disconnection rates using both the non-GAP LIHEAP baseline approach and the pre-Program baseline approach. We summarize the 2020 results in Attachment B.

The COVID-19 pandemic has resulted in an economic downturn and subsequent widespread job furloughs and losses due, in part, to the required temporary closure of many businesses.<sup>3</sup> The Company voluntarily suspended service disconnections in mid-March 2020 that would have ordinarily resumed on April 15, at the conclusion of the Cold Weather Rule (CWR) period, and is waiving late fees for all residential

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<sup>3</sup> Governor Walz's Emergency Executive Orders 20-04, 20-18, 20-33 and 20-48, in particular, kept businesses closed.

customers.<sup>4</sup> As the pandemic continued with many people still unable to return to work, the Commission extended the suspension of residential service disconnections for all utilities through the conclusion of the declared peacetime emergency.<sup>5</sup>

We have observed that beginning in 2020 and continuing into 2021, residential customers are making fewer payment arrangements than in a usual year. Therefore, the arrears balances are growing for customers who are in arrears without making payment plans.

In a usual year, these customers would be prompted to make payment plans when they receive disconnection notices for non-payment during the spring and summer months. During the pandemic, these notices have not been sent during the disconnection suspension since we were not disconnecting service. Of those customers making payment arrangements in 2020, a larger percentage of them are asking for longer payment arrangement terms than customers seeking such arrangements in 2019. Disconnections were not permitted to resume before the CWR period began on October 15, 2020, so some customers may be in arrears for up to 22 months by the time disconnections resume in August 2021, which is the date we will propose to resume disconnections in the utility transition plan to be filed on April 1, 2021. At that time, these customers may have amassed very large arrears balances and be at risk of disconnection.

To help customers ease back into contacting their utilities to learn about energy assistance and payment plan options, the Commission ordered that utilities that have filed a transition plan may resume collection activity and service disconnections upon the earlier of an Executive Secretary finding of transition plan completeness or 90 days following the end of the peacetime emergency.<sup>6</sup> We will file our transition plan April 1, and unless the Commission considers our plan incomplete, begin customer disconnection outreach June 1, and resume customer disconnections August 1.

## **A. Customer Payment Frequency**

Table 2 below shows a comparison of the payment frequency for our 2020 GAP participants to their payment frequency while they were enrolled in the Program. We note that because we have combination electric and natural gas customers in our Program, our partial payment categories reflect all Program participant payments that

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<sup>4</sup> See the Company's March 26, 2020 letter in Docket No. E,G999/CI-20-375 in which we indicated that late fees would be waived for residential and small business customers. In our June 8, 2020 letter in that docket, we extended the suspension of late fees to all customer classes, including large businesses.

<sup>5</sup> See the Commission's August 13, 2020 Order in Docket No. E,G999/CI-20-375.

<sup>6</sup> See the Commission's March 8, 2021 Order in Docket No. E,G999/CI-20-375.



were less than the total amount due for both electric and natural gas service during the billing period.

Our reported amounts include any participant partial- or late-payments received up to 60 days from their due dates:

<b>2020</b>	<b>Amount Paid</b>	<b>Amount Requested</b>	<b>Percentage Paid of Requested</b>	<b># of Payments Made</b>	<b># of Payments Requested</b>	<b>Percentage Made of Requested</b>
<b>GAP Program Participants</b>	\$8,240,873	\$8,424,194	98%	68,433	90,840	75%
<b>Non-Participants on LIHEAP</b>	\$14,645,899	\$16,024,818	91%	95,580	131,217	73%
<b>Active Residential non GAP or LIHEAP</b>	\$674,592,192	\$695,996,732	97%	4,418,761	4,948,345	89%

For comparison, Table 3 below shows the customer payment frequency data for 2019. Table 2 shows that in 2020 the customer payment frequency percentages decreased in all categories with the exception the percentage paid of requested for GAP Program participants. We saw the largest decrease in Non-GAP participants on LIHEAP in both categories, percentage paid and made of requested.

<b>2019</b>	<b>Amount Paid</b>	<b>Amount Requested</b>	<b>Percentage Paid of Requested<sup>7</sup></b>	<b># of Payments Made</b>	<b># of Payments Requested</b>	<b>Percentage Made of Requested</b>
<b>GAP Program Participants</b>	\$10,573,202	\$10,855,321	97%	82,781	101,979	81%
<b>Non-Participants on LIHEAP</b>	\$17,692,587	\$17,463,498	101%	105,729	135,870	78%
<b>Active Residential non GAP or LIHEAP</b>	\$697,268,277	\$707,976,040	98%	4,352,261	4,798,303	91%

<sup>7</sup> The percentages in this column contain customer payments and energy assistance, which is why the percentage can be over 100 percent in certain circumstances.

## B. Disconnections

Table 4 shows the credit-related disconnection percentages for the required customer categories using the non-GAP LIHEAP baseline approach:

<b>Table 4: Percentage Disconnected (Non-GAP LIHEAP Baseline Approach)</b>		
<b>Customer Category</b>	<b>2020</b>	<b>2019</b>
GAP participants	0.03%	3%
LIHEAP recipients that do not participate in GAP	0.24%	8%
All Residential Natural Gas Customers (non-GAP, non-LIHEAP)	0.022%	1%

When comparing 2020 to 2019, we see a decrease in all categories due to the ceasing of credit activity in 2020 as a result of the COVID-19 pandemic. While a few disconnections occurred that were non-heat related in the early months of 2020, no disconnections of residential customers for non-payment occurred beginning in mid-March 2020, and continuing to the present, due to the peacetime emergency related to the pandemic. As reported in the COVID-19 Docket No. E,G999/CI-20-375, the only residential and small business disconnections that have taken place since the peacetime emergency began have been for safety, tampering, owner request, and system issue locks.

Using the pre-Program baseline approach, we also see a decrease in disconnections. The percentage of customers disconnected pre-GAP was 6 percent and post-GAP was zero percent.

## C. Program Credits/Benefits

In this Section, we provide a summary of Program payments to participants.

<b>Table 5: GAP Participants Bills and Credits</b>		
	<b>2020</b>	<b>2019</b>
Average GAP participant annual bill	\$1,096	\$1,024
Average GAP participant monthly bill	\$91	\$85
Average Annual Affordability benefit	\$175	\$155
Average Annual Arrearage Forgiveness benefit	\$167	\$390
Average Monthly Bill Credit per participant	\$20	\$24

The average annual Affordability and Arrearage Forgiveness Program credits are calculations of the total annual credits of each component. For the Affordability component, it is \$1,344,741 divided by 7,683 participants. The Arrearage Forgiveness component is \$465,582 divided by 2,792 participants in arrears. The increase in affordability credits is due to consistent customer payments during their enrollment. It is worth noting that not all participants receive a credit each month due to various scenarios – for example, moving, closed account, or nonpayment.

The lower arrearage forgiveness benefit in 2020 can be attributed in part to lower overall participation. When participation is down, there are fewer high arrears customers enrolling, which impacts the level of arrearage benefit. In addition, customers that stayed on the program during 2020 experienced decreased arrears because in 2019 we retired arrears for customers sooner while they made payments. Therefore, their overall arrears balances were smaller, and they had lesser amounts to be forgiven.

#### **D. Arrearage Level**

Table 6 shows the average arrearage levels for the identified customer categories using the non-GAP LIHEAP baseline approach:

<b>Table 6: Average Arrearage Levels (Non-GAP LIHEAP Baseline Approach)</b>		
<b>Customer Category</b>	<b>2020</b>	<b>2019</b>
GAP Participants	\$490	\$576
Natural Gas LIHEAP recipients not enrolled in GAP	\$675	\$566
All Natural Gas Residential Customers (non- GAP, non-LIHEAP)	\$578	\$357

The arrearage levels are based on a snapshot of distinct customer categories at a point in time based on whether they were active from January 2020 through December 2020. The average arrears levels decreased for GAP participants in 2020. The decreases can be attributed to weather, customer payment frequency, changes in usage patterns, and the timing of bill cycles. The pandemic and resulting economic downturn are a primary factor for increased arrearage levels for customers not enrolled in the GAP.

Using the pre-Program baseline approach on the customer group who entered the GAP program during the 2020 year, we see a decrease to GAP participants' arrears levels compared to 2019, as shown in Table 7. The customers that stayed on the Program saw a decrease given the cumulative effect of multiple years on the program. In addition, because we enrolled fewer customers compared to previous year, arrears balances for non-Program participants are overall higher.

<b>Table 7: Average Arrearage Levels (Pre-Program Baseline Approach)</b>		
<b>Average Arrears for GAP Participants with active Participation</b>	<b>2020</b>	<b>2019</b>
Average Arrears 12 Months Prior to GAP Enrollment	\$381	\$449
Average Arrears 12 Months Post GAP Enrollment	\$355	\$336

Table 8 below shows the change between the total numbers of customers in arrears as of October 31, 2019 and October 31, 2020 to illustrate the effect of the GAP on the number of customers in arrears.

<b>Table 8 Program Effect on Number of Customers in Arrears</b>			
	<b># of Customers in Arrears 2020</b>	<b># of Customers in Arrears 2019</b>	<b>% Change in # of Customers in Arrears</b>
GAP	2,792	3,372	-17%
Non-GAP LIHEAP	5,626	6,208	-9%
Residential	55,188	51,892	6%

## **E. Coordination with Other Low-Income and Conservation Resources**

Because our Personal Accounts team interacts with hundreds of low-income customers and other assistance-related organizations throughout the year, consistent with the Commission's November 18, 2009 Order in Docket No. G002/GR-06-1429, we provide a summary of our major outreach initiatives, along with ECC, rather than detailing each individual communication with these agencies:

- Dedicated internal personal account department to increase program awareness and participation;
- Updated the Xcel Energy website to allow for better access to information for Energy Assistance and Program information to households;
- Coordinated with ECC on the best approach to reach the lowest income and highest consumption households;
- ECC updated their website to accept online applications;

- Participated in virtual quarterly MN Energy Assistance Policy Action Committee meetings;
- Participated in Virtual Safety Net Meetings with Ramsey County throughout 2020;
- Sent multiple mailings and outreach to eligible households identified by the Company for the Program; and
- Conducted a dedicated Call Campaign to GAP customers who do not make their required payment within 30 days of their invoice.

Our Personal Account Representatives (PAR) team communicates daily with customers and agencies about available programs for households, including GAP. We discuss with households their ability to maintain service, how they can seek available funding through Energy Assistance, and help match them with internal programs for which they are eligible. In 2020 the PAR department received 24,256 phone calls from Minnesota agencies and households related to assistance and our programs resulting in referrals to energy assistance and bill payment assistance programs. We saw a significant decrease in customer contact compared to 2019.

#### **F. Application Processing**

The Commission’s December 29, 2011 Order in Docket No. G002/GR-06-1429 requires that we establish an application processing goal of processing 95 percent of all complete GAP applications within 30 days of our receipt. We met this goal in 2020.

### **IV. PARTICIPATION AND APPLICATION RATES, RETENTION, SATISFACTION, AND COLLECTION ACTIVITY**

#### **A. Participation and Application Rates**

To provide a look at the number of LIHEAP-eligible customers who use the Program, Table 9 shows LIHEAP participation rate and the LIHEAP application rate.

<b>Table 9: Program Participation and Application Rates</b>		
<b>Participation Rate</b>	<b>2020</b>	<b>2019</b>
Xcel Energy LIHEAP Recipients	18,280	19,963
Xcel Energy GAP Participants	7,683	9,675
Participation rate %	42%	48%
<b>Application Rate</b>		
LIHEAP (Not Enrolled in GAP)	11,562	12,447
Total new Households applied for GAP	1,450	2,718
Application Rate %	12%	22%

The Program participation rate decreased by 6 percent in 2020 compared to 2019, while the Program application rate also decreased by 10 percent during that same timeframe. With the overall number of LIHEAP applications being lower this year, along with the suspension of credit activity, there is a direct correlation to program participation. The Company also actively re-enrolled households that were removed for nonpayment throughout the year to retain participation.

## **B. Retention**

In 2020, a total of 2,572 participants were removed from the Program for various reasons, as summarized below. In order to compare 2020 Program retention to 2019, Table 10 below shows the percent of total participants that left the Program for the various reasons in each of these years.

<b>Table 10: Program Retention</b>			
<b>Program Removal Reason</b>	<b>Number of Customers Removed</b>	<b>Percentage of Total Program Removals</b>	
		<b>2020</b>	<b>2019</b>
Non-Payment	1,192	46%	60%
Household Move	442	17%	18%
Ineligibility or Customer Request	938	36%	22%
<u>Credit Balance</u>	<u>0</u>	<u>0%</u>	<u>0%</u>
Total	2,572	100%	100%

Non-Payment is the primary reason participants leave the Program, and this category remained consistent in 2020. Customers are removed from the Program if they do not make a monthly payment over a period of 60 days and/or two consecutive billing cycles. The ineligibility category is defined as customers who no longer meet the threshold of a percentage of income and is deemed affordable.

In 2012, we worked with ECC, the Office of the Attorney General-Utilities and Antitrust Division (OAG), and the Department of Commerce (Department) to create a new credit balance threshold that became effective with the October 26, 2012 Order in Docket No. G002/GR-06-1429. Under the 2012 agreement, we identify participants for individual Program review when their credit balance exceeds \$1,000 and refer that customer to ECC to develop a joint recommendation to determine if they should stay on or be removed from the Program. Next, we bring the resulting recommendation to the OAG, and present the recommendation stemming from ECC, OAG, and Company involvement to the Department. When all parties have agreed on an action, we proceed with that action. In 2020, we did not pursue the removal of any customer under this agreement.

### **C. Customer Satisfaction**

We do not conduct a specific customer satisfaction survey that addresses participation in this Program. However, we are not aware of any customer complaints made to the Company, the Commission, or ECC during the 2020 Program year by Program participants.

### **D. Collection Activity**

While we do not have specific data regarding the Program's impact on collection activity, we believe it is reasonable to conclude from the lower disconnection percentage and the lower average arrearage level is attributable to GAP participants as compared to other customers receiving LIHEAP, that the Company may have experienced a reduction in collection activity as a result of this Program.

## **V. PROPOSED TARIFF MODIFICATION**

We propose to modify the Program qualifications and associated program tariff to lower the percent of a Qualified Customer's household income used to determine their bill credit from four percent to three percent. The goal of this modification is to lower the amount that each customer is required to pay, which will increase the amount that can be credited to each customer. Lowering the income qualification threshold one percent will also allow more customers to qualify for credits, which we expect will lead to more participation in the program.

We believe that our proposal to decrease the income percentage that participants are required to pay will increase the amount of GAP credits issued, which should draw down the tracker balance. We prefer to lower the tracker balance via increasing the

amount of credits issued to customers versus lowering the collection rate over a certain number of years because this change will have a greater positive impact on customers needing assistance, especially during this challenging time. This program change brings greater value for participating customers without causing any harm to ratepayers who pay the surcharge amount.

We will monitor the impact of this modification to determine if this change is sustainable. Should the tracker balance become too low in the future, we will 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.

To implement this tariff change we need to modify the identified percent of a Qualified Customer's household income, which is found in Section No. 5, Sheet No. 68 of our Minnesota Gas Rate Book – MPUC No. 2. A redline and clean version of the tariff are included as Attachment C. The content requirements for a miscellaneous filing as contemplated in Minn. R. 7829.1300, subpart 3 are provided in Attachment D.

We propose to implement the program modification upon issuance of the Commission Order in this matter.

### **CONCLUSION**

Xcel Energy requests the Commission to accept our Gas Affordability Program Annual Report for 2020 and approve the proposed tariff modification to lower the percentage of income that participants are required to pay.

Dated: March 31, 2021

Northern States Power Company



	Beginning of year life to date	2020												Current year to date	Current life to date balance
		January	February	March	April	May	June	July	August	September	October	November	December		
<b>2020 Low Income Discount Program</b>															
UMC 2974 MNGVA:[*Gas Affordability	(29,420,322.83)	(519,078.57)	(429,267.05)	(425,726.26)	(272,500.14)	(158,300.67)	(84,052.27)	(56,857.81)	(52,324.37)	(62,484.95)	(120,076.07)	(224,874.83)	(354,270.64)	(2,759,813.63)	(32,180,136.46)
Manually journaled surcharge on handbilled accts	(8,722.88)	(60.72)	(72.54)	(53.17)	(45.04)	(53.63)	(67.68)	(88.90)	(15.54)	(81.94)	(48.20)	(7.71)	(37.86)	(632.93)	(9,355.81)
<b>A Total Billed</b>		<b>\$ (519,139.29)</b>	<b>\$ (429,339.59)</b>	<b>\$ (425,779.43)</b>	<b>\$ (272,545.18)</b>	<b>\$ (158,354.30)</b>	<b>\$ (84,119.95)</b>	<b>\$ (56,946.71)</b>	<b>\$ (52,339.91)</b>	<b>\$ (62,566.89)</b>	<b>\$ (120,124.27)</b>	<b>\$ (224,882.54)</b>	<b>\$ (354,308.50)</b>		
UMC 2818 Arrearage Forgiveness MNGas:[*GAP Forgiveness	3,604,829.68	64,962.99	72,682.73	21,292.00	41,168.51	20,896.90	20,260.00	38,199.77	91,800.66	50,495.74	16,014.00	11,887.98	15,920.28	465,581.56	4,070,411.24
UMC 1354 Affordability Credits MNGVC:[*GAP Affordability	22,976,996.91	157,258.00	133,595.00	126,698.00	106,529.00	101,023.00	94,752.00	109,614.00	108,039.00	107,467.00	102,952.00	77,685.00	119,129.00	1,344,741.00	24,321,737.91
UMC 1354 on a GJ, not on the TAR report	68.00													-	68.00
UMC 2818 on a GJ, not on the TAR report	8.00													-	8.00
2008 & 2012 disbursements coded incorrectly	14,422.00													-	14,422.00
<b>B Total Disbursed</b>		<b>\$ 222,220.99</b>	<b>\$ 206,277.73</b>	<b>\$ 147,990.00</b>	<b>\$ 147,697.51</b>	<b>\$ 121,919.90</b>	<b>\$ 115,012.00</b>	<b>\$ 147,813.77</b>	<b>\$ 199,839.66</b>	<b>\$ 157,962.74</b>	<b>\$ 118,966.00</b>	<b>\$ 89,572.98</b>	<b>\$ 135,049.28</b>	1,810,322.56	28,406,647.15
<b>C Admin Program Costs</b>	1,403,064.09	<b>\$ 2,445.75</b>	<b>\$ 16,326.46</b>	<b>\$ 71,935.08</b>	<b>\$ 3,458.21</b>	<b>\$ 3,480.38</b>	<b>\$ 2,219.48</b>	<b>\$ 4,061.16</b>	<b>\$ 1,942.88</b>	<b>\$ 9,401.41</b>	<b>\$ 2,503.78</b>	<b>\$ 2,048.03</b>	<b>\$ 2,044.27</b>	121,866.89	1,524,930.98
<b>Monthly (over) under recovery</b>		(294,472.55)	(206,735.40)	(205,854.35)	(121,389.46)	(32,954.02)	33,111.53	94,928.22	149,442.63	104,797.26	1,345.51	(133,261.53)	(217,214.95)	(828,257.11)	(2,257,914.14)
<b>Tracker Balance Asset/(Liability)</b>	(1,429,657.03)	<b>(1,724,129.58)</b>	<b>(1,930,864.98)</b>	<b>(2,136,719.33)</b>	<b>(2,258,108.79)</b>	<b>(2,291,062.81)</b>	<b>(2,257,951.28)</b>	<b>(2,163,023.06)</b>	<b>(2,013,580.43)</b>	<b>(1,908,783.17)</b>	<b>(1,907,437.66)</b>	<b>(2,040,699.19)</b>	<b>(2,257,914.14)</b>		

Data in this Attachment is based on calendar year 2020. Where applicable, the cohort group used was 12 months prior and 12 months after program enrollment

2020	
<b>Program dates and status</b>	
Date program started	2/1/2008
Program effective date	1/1/2020
Date next evaluation report due	5/31/2022
Date last evaluation completed	5/31/2019
Last evaluation docket number	G002/M-19-380
Status of program (pilot or permanent)	Permanent
Date pilot program ends, if applicable	N/A
Date of last Evaluation Order	1/17/2020
Program administrator	Energy Cents Coalition
<b>Participant benefits</b>	
Description of affordability benefit - maximum payment as % of household income	4%
Description of arrearage forgiveness benefit - repayment period	12-24 months
Average annual income per participant	\$13,119
Average annual bill per participant	\$1,096
Average arrearage balance per participant	\$178
Average annual affordability benefit per participant	\$175
Average annual arrearage forgiveness benefit per customer	\$167
Average total benefit per participant	\$240
<b>Cost and Cost Recovery</b>	
Annual budget	\$2,500,000
Actual revenue	\$2,760,447
Annual cost	\$1,932,190
Surcharge (\$/therm)	\$0.00445
Annual cost of surcharge for average residential customer who used 900 therms of gas per year	\$4.01
Customer classes assessed the GAP surcharge	Residential firm, commercial firm and Commercial Demand Billed Service
Tracker balance as of year-end	\$2,257,914
<b>Participation</b>	
% of LIHEAP customers that participated in GAP	42%
Number of participants enrolled as of year-end	5,022
Number of participants enrolled and receiving benefits at some time during the year	7,683
Whether a waiting list occurred at any time during the year	N/A
If so, the number of customers on the waiting list and for how long	N/A
<b>Impact on disconnection rates</b>	
Disconnection rates - non-GAP LIHEAP baseline	
GAP participants	0.03%
Non-GAP LIHEAP customers	0.24%
Non-LIHEAP residential customers	0.02%
Disconnection rates - pre-program baseline	
GAP participant cohort	0.14%
GAP participants cohort before they were enrolled in GAP	6%
<b>Impact on payment frequency</b>	
Dollars paid ÷ dollars requested	
Non-GAP LIHEAP Baseline	
GAP participants	98%
Non-GAP LIHEAP customers	91%
Non-LIHEAP residential customers	97%
Pre-Program Baseline	
GAP participant cohort	110%
GAP participant cohort before they were enrolled in GAP	93%
Number of payments made paid ÷ number of payments requested	
Non-GAP LIHEAP baseline	
GAP participants	75%
Non-GAP LIHEAP customers	73%
Non-LIHEAP residential customers	89%
Pre-program baseline	
GAP participant cohort	76%
GAP participant cohort before they were enrolled in GAP	75%
<b>Impact on arrears</b>	
% Customers in arrears	
Non-GAP LIHEAP baseline	
GAP participants	36%
Non-GAP LIHEAP customers	49%
Non-LIHEAP residential customers	12%
Pre-Program baseline	
GAP participant cohort	56%
GAP participant cohort before they were enrolled in GAP	61%
Dollar amount of arrears	
% Change in dollar amount of arrears (non-GAP LIHEAP baseline)	
GAP participants	-6%
Non-GAP LIHEAP customers	56%
Non-LIHEAP residential customers	113%
Dollar amount of arrears (pre-Program baseline)	
GAP participant cohort	\$477,288
GAP participant cohort before they were enrolled in GAP	\$498,414
<b>Complaints</b>	
Number of complaints	0
Nature of complaint(s)	N/A
<b>Retention</b>	
GAP participant retention rate	67%
<b>Impact on collection activity</b>	
Brief description of effect of GAP on collection activity	While we do not have specific data regarding the Program's impact on collection activity, we believe it is reasonable to conclude from the lower disconnection percentage and the lower average arrearage level attributable to GAP participants as compared to other customers receiving LIHEAP, that the Company may have experienced a reduction in collection activity as a result of this Program.
<b>Coordination with other programs</b>	
Page(s) of report where coordination efforts described	pp. 11-12

# **Redline**

**LOW INCOME ENERGY DISCOUNT RIDER**

Section No. 5  
~~2nd~~<sup>3rd</sup> Revised Sheet No. 68

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**AVAILABILITY**

This Rider is 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 ("Rider Program Year"). Further, such customers must agree to be placed on a levelized payment plan and must also agree to a payment schedule as described below to be considered a "Qualified Customer." Unless otherwise specified in this tariff, Qualified Customers on the Rider shall receive service in accordance with all terms and conditions of the standard gas service tariffs applicable to residential customers.

**RIDER DESCRIPTION**

The Rider has two components: Affordability and Arrearage Forgiveness. Company, or an agent of Company, will review current billing and consumption information, approved LIHEAP benefits, and household income information as submitted to Company to determine a Qualified Customer's payment schedule amount. A Qualified Customer's payment schedule will include both payment of the customer's current month's bill (which reflects one-twelfth of the levelized payment plan) and payment of a portion of the Qualified Customer's pre-program arrears. The Rider shall meet the conditions of Minn. Stat. §216B.16, Subd. 15 on low-income programs.

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**RATE**

Affordability Component

The Affordability component consists of a bill credit determined as one-twelfth of the difference between Company's estimate of the Qualified Customer's annual gas bill and ~~4%~~<sup>3%</sup> of the Qualified Customer's household income as provided by the Qualified Customer to Company. This bill credit is a Rider program cost that will be included in the Tracker (see definition below). Any energy assistance sums not applied to arrears will be applied to a Qualified Customer's current bill.

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The Affordability Component will be calculated as follows:

1. Calculate four percent of the participant's reported income and divide it by 12 (months) to get the monthly Affordability Payment amount; then
2. Sum the participant's annual usage amount and divide it by 12 (months) to determine the participant's average monthly usage/bill; and
3. Subtract the participant's Affordability Payment from the Average Monthly Bill to determine the Affordability Credit amount.

Arrearage Forgiveness Component

The Arrearage Forgiveness component consists of a monthly credit that will be applied each month after receipt of the Qualified Customer's payment. The credit will be designed to retire pre-program arrears over a period of up to 24 months, with the Company matching the Qualifying Customer's contribution to retiring pre-program arrears. The credit is determined by taking the pre-program arrears divided by the number of months to retire the arrears divided by two and then subtracting any energy assistance sums received by the Company on behalf of the customer divided by the number of months remaining to retire the arrears divided by two. This arrearage forgiveness credit is a Rider program cost that will be included in the Tracker.

The Arrearage Forgiveness Component will be calculated as follows:

1. Divide the pre-program arrears by the number of months to retire the arrears, divided by two; and
2. Subtract any energy assistance sums received by the Company, divided by the number of months remaining to retire the arrears, divided by two.

(Continued on Sheet No. 5-69)

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Date Filed: ~~11-12-09~~<sup>03-31-21</sup> By: ~~Judy M. Pifer~~<sup>Christopher B. Clark</sup> Effective Date: ~~05-01-11~~  
President, ~~and CEO of~~ Northern States Power Company, a Minnesota corporation  
Docket No. G002/~~GR-09-1153M-21-~~ Order Date: ~~12-06-10~~

**Clean**

**LOW INCOME ENERGY DISCOUNT RIDER**

Section No. 5  
3rd Revised Sheet No. 68

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**AVAILABILITY**

This Rider is 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 ("Rider Program Year"). Further, such customers must agree to be placed on a levelized payment plan and must also agree to a payment schedule as described below to be considered a "Qualified Customer." Unless otherwise specified in this tariff, Qualified Customers on the Rider shall receive service in accordance with all terms and conditions of the standard gas service tariffs applicable to residential customers.

**RIDER DESCRIPTION**

The Rider has two components: Affordability and Arrearage Forgiveness. Company, or an agent of Company, will review current billing and consumption information, approved LIHEAP benefits, and household income information as submitted to Company to determine a Qualified Customer's payment schedule amount. A Qualified Customer's payment schedule will include both payment of the customer's current month's bill (which reflects one-twelfth of the levelized payment plan) and payment of a portion of the Qualified Customer's pre-program arrears. The Rider shall meet the conditions of Minn. Stat. §216B.16, Subd. 15 on low-income programs.

**RATE**

Affordability Component

The Affordability component consists of a bill credit determined as one-twelfth of the difference between Company's estimate of the Qualified Customer's annual gas bill and 3% of the Qualified Customer's household income as provided by the Qualified Customer to Company. This bill credit is a Rider program cost that will be included in the Tracker (see definition below). Any energy assistance sums not applied to arrears will be applied to a Qualified Customer's current bill.

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The Affordability Component will be calculated as follows:

1. Calculate four percent of the participant's reported income and divide it by 12 (months) to get the monthly Affordability Payment amount; then
2. Sum the participant's annual usage amount and divide it by 12 (months) to determine the participant's average monthly usage/bill; and
3. Subtract the participant's Affordability Payment from the Average Monthly Bill to determine the Affordability Credit amount.

Arrearage Forgiveness Component

The Arrearage Forgiveness component consists of a monthly credit that will be applied each month after receipt of the Qualified Customer's payment. The credit will be designed to retire pre-program arrears over a period of up to 24 months, with the Company matching the Qualifying Customer's contribution to retiring pre-program arrears. The credit is determined by taking the pre-program arrears divided by the number of months to retire the arrears divided by two and then subtracting any energy assistance sums received by the Company on behalf of the customer divided by the number of months remaining to retire the arrears divided by two. This arrearage forgiveness credit is a Rider program cost that will be included in the Tracker.

The Arrearage Forgiveness Component will be calculated as follows:

1. Divide the pre-program arrears by the number of months to retire the arrears, divided by two; and
2. Subtract any energy assistance sums received by the Company, divided by the number of months remaining to retire the arrears, divided by two.

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(Continued on Sheet No. 5-69)

Date Filed: 03-31-21

By: Christopher B. Clark

Effective Date:

President, Northern States Power Company, a Minnesota corporation

Docket No. G002/M-21-

Order Date:

## **I. SUMMARY OF FILING**

Pursuant to Minn. Rule 7829.1300, Subp. 1, a one paragraph summary of our filing accompanies this Petition.

## **II. SERVICE ON OTHER PARTIES**

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document with the Commission. Pursuant to Minn. R. 7829.1300, subp. 2, copies of the summary of this filing have been served on the parties on Xcel Energy's miscellaneous gas 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, doing business as:  
Xcel Energy  
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 - 8<sup>th</sup> Floor  
Minneapolis, MN 55401  
(612) 215-4605

### **C. Date of Filing and Proposed Effective Date of Tariff Change**

The date of this filing is March 31, 2021. The Company proposes the updated tariff be effective upon issuance of a Commission Order in this proceeding.

**D. Statutes Controlling Schedule for Processing the Filing**

Minn. Stat. § 216B.16, Subd. 1 allows a utility to place a rate change in effect upon 60-days' notice to the Commission. Since no determination of Xcel Energy's general revenue requirement is necessary, Commission Rules define this filing as a "miscellaneous filing" under Minn. Rule 7829.0100, Subp. 11. Pursuant to Minn. Rule 7829.1400, initial comments on a miscellaneous filing are due within 30 days of filing, with replies due 10 days thereafter.

**E. Utility Employee Responsible for Filing**

Bridget Dockter  
Manager, Policy & Outreach  
Xcel Energy  
414 Nicollet Mall, 401 - 7<sup>th</sup> Floor  
Minneapolis, MN 55401  
(612) 337-2096

**IV. MISCELLANEOUS INFORMATION**

The Company will serve a copy of the Petition summary on those persons on the gas utility general service list. Pursuant to Minn. Rule 7829.0700, we request that the following persons be placed on the Commission's official service list for this matter:

Mara K. Ascheman  
Senior Attorney  
Xcel Energy  
414 Nicollet Mall, 401 - 8<sup>th</sup> Floor  
Minneapolis, MN 55401  
[mara.k.ascheman@xcelenergy.com](mailto:mara.k.ascheman@xcelenergy.com)

Lynnette Sweet  
Regulatory Administrator  
Xcel Energy  
414 Nicollet Mall, 401 - 7<sup>th</sup> Floor  
Minneapolis, MN 55401  
[regulatory.records@xcelenergy.com](mailto:regulatory.records@xcelenergy.com)

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



STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF NORTHERN STATES  
POWER COMPANY'S 2020 ANNUAL GAS  
AFFORDABILITY PROGRAM REPORT AND  
PROPOSED TARIFF MODIFICATION

DOCKET NO. G002/M-21-\_\_\_\_  
**ANNUAL REPORT & REQUEST  
FOR A TARIFF MODIFICATION**

**SUMMARY OF FILING**

Please take notice that on March 31, 2021 Northern States Power Company, doing business as Xcel Energy, submitted to the Minnesota Public Utilities Commission an Annual Report for the Gas Affordability Program. The report includes a request to change the percentage of the Qualified Customer's household income to be included in the calculation of the Affordability Component

**CERTIFICATE OF SERVICE**

I, Crystal Syvertsen, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

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

xx electronic filing

**DOCKET Nos. G002/M-21-\_\_\_\_**  
**MISCELLANEOUS GAS SERVICE LIST**

Dated this 31<sup>st</sup> day of March 2021

/s/

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Crystal Syvertsen

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd.  St. Louis, MO 63119-2044	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
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	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St  Saint Paul, MN 55102-2617	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620  St. Paul, MN 551640620	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
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	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350  Saint Paul, MN 55101	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas