

May 29, 2014

Burl W. Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket Nos. G004/M-07-1235, G007,011/M-07-1131, G008/GR-05-1380,  
G001/M-07-1295, G002/GR-06-1429

Dear Dr. Haar:

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

Minnesota Natural Gas Utilities' 2013 Gas Affordability Program (GAP) Annual Reports.

The annual reports were filed in March and April 2014 by:

Tamie Aberle  
Director of Regulatory Affairs  
Great Plains Natural Gas Company  
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414 Nicollet Mall  
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The Department recommends acceptance of the 2013 GAP reports with one additional recommendation for Xcel Energy.

The Department is available to answer any questions the Commission may have in this matter.

Sincerely,

/s/ SUSAN L. PEIRCE  
Rate Analyst

SLP/lt  
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE  
MINNESOTA DEPARTMENT OF COMMERCE  
DIVISION OF ENERGY RESOURCES

DOCKET NOS. G004/M-07-1235, G007,011/M-07-1131, G008/GR-05-1380,  
G001/M-07-1295, G002/GR-06-1429

**I. BACKGROUND**

Minn Stat. §216B.16, Subd. 16 requires public utilities serving low-income residential ratepayers who use natural gas for heating to file an affordability program with the Minnesota Public Utilities Commission (Commission). Low-income residential ratepayers are defined by the statute as ratepayers receiving energy assistance from the Low-Income Home Energy Assistance Program (LIHEAP). The statute requires that any affordability program must:

- 1) Lower the percentage of income that participating low-income households devote to energy bills;
- 2) Increase participating customer payments over time by increasing the frequency of payments;
- 3) Decrease or eliminate participating customer arrears;
- 4) Lower the utility costs associated with customer account collection activities;  
and
- 5) Coordinate the program with other available low-income bill payment assistance and conservation resources.

In a series of Orders in each respective docket,<sup>1</sup> the Commission required utilities to report the following information in their annual reports:

- Customer payment frequency (including partial and late payment information);
- Disconnections;
- Payment amounts;

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<sup>1</sup> See *Order Accepting Compliance Filings Regarding Gas Affordability Program and Requiring Further Action*, November 18, 2009, and *Order Accepting Gas Affordability Program Reports, Deferring Action on Another, and Requiring Further Action*, September 22, 2010 in Docket Nos. G004/M-07-1235, G007,011/M-07-1131, G008/GR-05-1380, G001/M-07-1295, and G002/GR-06-1429.

Analyst assigned: Susan Peirce

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- Customer Payment history;
- Arrearage levels;
- Coordination with other available low-income payment assistance and conservation resources; and
- Customer complaints.

Additionally, in its September 22, 2010 Order, the Commission required all natural gas utilities to:

- Implement an application processing goal;
- Assess periodically whether the use of their third-party administrator is the most effective and efficient arrangement;
- Require the third-party administrator to make the Gas Affordability Program (GAP or Program) application available on their website;
- Provide reminders to GAP participants when payments are missed, and;
- Cross-promote GAP with other programs.<sup>2</sup>

Finally, in an Order dated September 25, 2013, the Commission required utilities to file a summary schedule that includes the following information:

- average annual affordability benefit received per customer;
- average annual arrearage forgiveness benefit received per customer;
- percentage of LIHEAP customers that participated in GAP;
- disconnection rates for (a) GAP customers, (b) LIHEAP-non-GAP customers, and (c) non-LIHEAP customers (all firm customers including C&I);
- number of GAP participants enrolled as of year-end;
- number of GAP participants enrolled and receiving benefits at some time during the year;
- annual program budget;
- actual program revenue;
- actual program cost;
- GAP tracker balance as of year-end; and
- GAP rate-affordability surcharge (\$/therm).<sup>3</sup>

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<sup>2</sup> *Order Accepting Gas Affordability Program Reports and Requiring Further Action*, December 29, 2011 in Docket Nos. G004/M-07-1235, G007,011/M-07-1131, G008/GR-05-1380, G001/M-07-1295, and G002/GR-06-1429.

<sup>3</sup> *Order Accepting Gas Affordability Program Reports*, September 25, 2013 in Docket Nos. G004/M-07-1235, G007,011/M-07-1131, G008/GR-05-1380, G001/M-07-1295, and G002/GR-06-1429.

Docket Nos. Docket Nos. G004/M-07-1235, G007,011/M-07-1131, G008/GR-05-1380,  
G001/M-07-1295, G002/GR-06-1429

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The following utilities submitted the GAP 2013 annual reports in the following dockets:

- Great Plains Natural Gas Company (Great Plains) in Docket No. G004/M-07-1235;
- Minnesota Energy Resources Corporation (MERC) in Docket No. G007,011/M-07-1131;
- CenterPoint Energy (CenterPoint) in Docket No. G008/GR-05-1380;
- Interstate Power and Light Company (IPL) in Docket No. G001/M-07-1295); and
- Northern States Power d/b/a Xcel Energy (Xcel Gas) in Docket No. G002/GR-06-1429.

## II. DEPARTMENT ANALYSIS

Each of the five utilities have submitted the information required by the Commission in its Orders cited above. Attachment A to these comments provides a summary of the schedules submitted in response to the Commission's September 13, 2013 Order. In addition to the general reporting requirements required of all utilities, Great Plains, CenterPoint and Xcel Gas have individual reporting requirements established by the Commission at the time of its approval of the utility's GAP program. The Department offers the following comments on these individual requirements below.

### A. GREAT PLAINS NATURAL GAS

In the May 12, 2008 Order approving its GAP, Great Plains was ordered to submit:

- An evaluation of the assumed GAP participation rate of five percent in light of actual participation in the Program;
- The actual annual average cost per participant for the Program, and explanation of deviations from the assumed average annual cost per participant of \$555; and
- Great Plains' conclusion regarding the reported evaluation data.

In 2013, the number of customers applying for GAP decreased 13 percent to 389 applications from 2012. Great Plains notes that its LIHEAP applications also decreased by 9 percent in 2013. Of the 389 applicants, 95 qualified for GAP and 82 were enrolled in the Program. Great Plains indicated that qualifying GAP participants represent less than 1 percent of the Company's total residential customers and 5 percent of customers qualifying for LIHEAP.

The average cost per GAP participant was \$63.27 as compared with \$174.12 in 2012 and \$114.56 in 2011. Great Plains attributes the reduction in average cost to a decrease in the number of participating customers with an arrears balance, customers continuing to exceed the current household income requirement for participation and lower gas costs. Only 16

percent of customers applying for GAP in 2013 had an arrears balance compared with 27 percent in 2012.

Beginning in 2012, Great Plains GAP surcharge was set to \$0.0 per dekatherm to continue through then end of the 2014 program year. Great Plains GAP fund balance fell from \$104,800 in 2012 to \$94,599 at year-end 2013. Great Plains will be submitting its evaluation report by June 1, 2014, and indicates it will address the unspent balance at that time.

West Central Minnesota Communities Action, Inc. (West Central) continues to serve as third-party administrator for Great Plains' GAP. Despite reductions to the income threshold for participation (from six to four percent), and implementing a comprehensive GAP outreach plan, customer participation was down in 2013. Great Plains indicates it is continuing to work with West Central to promote participation to its LIHEAP eligible customers.

The Department concludes that Great Plains has provided the information required by the Commission.

#### **B. CENTERPOINT**

In its November 22, 2010 *Order Evaluating Gas Affordability Program, Extending and Modifying Pilot Program, Authorizing Cost Recovery and Requiring Future Reporting* in Docket No. E008/GR-05-1380, the Commission required that:

- CenterPoint shall, in future reporting, report the potential no-, low- and mid-cost conservation measures that could be implemented in the households of GAP participants, along with CenterPoint's plans to encourage GAP participants to increase their use of these measures;
- CenterPoint shall use actual disconnection and reconnection rates to estimate disconnection and reconnection costs for the remainder of the pilot period, not disconnection rates from 2009; and
- CenterPoint shall report data on the number of people who do not qualify for credits, including zero-credit customers.

CenterPoint listed a number of conservation measures that it promotes including installing a programmable thermostat, installing a low-flow showerhead and faucet aerator, and weather-stripping. In addition, the Company makes a number of conservation measures available to qualifying low-income customers at no cost including a home energy audit, weatherization, and furnace, boiler and water heater replacement, repair and tune-ups. CenterPoint provided information on a large number of outreach activities it undertook in 2013 that included energy conservation and GAP information. In addition, the Company promoted its Low Income Weatherization program to low-income customers in October and

November, and sent free home energy efficiency kits with low-flow products and weatherization materials to its LIHEAP customers.

In 2013, Centerpoint's disconnection rate for GAP customers was 7.8 percent compared to a 13.3 percent rate for LIHEAP non-GAP customers. GAP appears to reduce the disconnection rate among program participants compared with the for other CenterPoint customers eligible for LIHEAP, thereby reducing disconnection and reconnection costs.

Finally, CenterPoint reported that 4,112 customers applied for GAP, but were not enrolled because their incomes and usage made them ineligible for affordability or arrearage credits.

### C. XCEL

In its October 26, 2012 *Order Accepting Gas Affordability Program Evaluation and Requiring Program to Continue as Modified* in Docket No. E002/GR-06-1429, the Commission required Xcel to reduce its gas affordability program surcharge rate for four years to a level that will reduce its GAP tracker balance by approximately \$1 million and that will also allow for an increase in outreach and participation levels.

Xcel reports that on January 1, 2013 it lowered the GAP surcharge from \$0.00445 per therm to \$0.00400 per therm. As a result of the reduction, Xcel reports a reduction of \$249,095 in 2013 from the amounts it would have collected had the surcharge remained at \$0.00445 per therm. On May 19, 2014, Xcel submitted a supplemental report indicating that because of the colder than normal winter and increased natural gas sales, the Company had collected \$306,000 more than forecast. As of April 30, 2014, the Company had a low-income tracker balance of approximately \$2.7 million.

Xcel reports that it redesigned its application and increased its mailings throughout 2013; however participation did not increase in 2013. Xcel states that it is continuing its efforts to increase its outreach in 2014.

Despite Xcel's continued outreach efforts and the reduction in the surcharge from \$0.00445 to \$0.0040 per therm, the Department remains concerned with the increasing size of the tracker balance. The Company states it is open to considering temporarily suspending the surcharge factor (reducing it to zero) in order to reduce the tracker balance. In its Supplemental Report, Xcel states that it expects to collect approximately \$670,000 in the final half of 2014. Suspending the surcharge would reduce the tracker balance by a portion of the \$670,000 depending on the timing of the suspension. The Department recommends Xcel be directed to suspend its GAP surcharge, and directed to file a compliance filing with the year-end 2014 updated tracker balance by January 31, 2015, and a proposal for either reinstating a GAP surcharge or continuing the surcharge suspension.

The Department concludes that Xcel provided the information required by the October 26, 2012 Order in its annual GAP report.

#### *D. MULTI-YEAR EVALUATIONS*

In addition to the annual reports, each utility's GAP tariff requires that periodic multi-year evaluations, including a financial evaluation of the Program, be submitted. Below is a list of the dates of each utility's next evaluation.

- Great Plains: June 1, 2014
- MERC: May 31, 2015
- CenterPoint: June 1, 2016
- IPL: May 31, 2015
- Xcel: May 31, 2016

The evaluations will include each utility's discussion on how its GAP achieved the goals set forth in Minn. Stat. §216B.16, Subd. 15, and each utility's financial evaluation of its GAP, as required by tariff. The Department believes that use of the multi-year data included in the evaluations, rather than the single-year data provided in the annual GAP reports, provides a better perspective for identifying successes and areas needing improvement.

#### *E. CONCLUSIONS*

The Department concludes that all five utilities have submitted complete 2012 GAP reports, and that CenterPoint, Great Plains and Xcel have met their individual reporting requirements.

### **III. DEPARTMENT RECOMMENDATIONS**

The Department recommends that the Commission accept the 2013 GAP annual reports for the following utilities:

1. Great Plains Natural Gas in Docket No. G004/M-07-1235;
2. Minnesota Energy Resources Corporation in Docket No. G007,011/M-07-1131;
3. CenterPoint Energy in Docket No. G008/GR-05-1380;
4. Interstate Power & Light in Docket No. G001/M-07-1295; and
5. Xcel Energy in Docket No. G002/GR-06-1429.
- 6.

Additionally, the Department recommends the Commission suspend Xcel Energy's GAP surcharge, and direct the Company to submit a compliance filing with the year-end 2014 tracker balance, and a proposal to either reinstate a surcharge or continue the suspension by January 31, 2015.



### Attachment A: 2013 GAP Annual Compliance Summary

	Great Plains	MERC	CenterPoint	IPL	Xcel
Avg. Annual Affordability Benefit per customer	\$78.88	\$479	\$683.45	\$460.56	\$158.00
Avg. Annual Arrearage forgiveness per customer	\$43.43	\$37	\$245.36	\$24.81	\$28.00
Percent of LIHEAP customers Participating in GAP	4.82%	8%	44.8%	4%	49%
Disconnection rates for:					
(a) GAP customers	19.5%	< 1%	7.8%	0%	5%
(b) LIHEAP-Non-Gap customers	23.9%	<15%	13.3%	0.008%	9%
(c ) All firm customers	3.9%	3%	3.8%	0.003%	<1%
No. of GAP participants at yr-end	29	1,080	11,574	92	6,635
No. of GAP participants enrolled & receiving benefits at some time during the year	82	1,248	17,176	116	13,337
Annual program budget	\$50,000	\$1,000,000	\$5,000,000	\$50,000	\$2,500,000
Annual program cost	\$7,688.32	\$1,329,506	\$5,411,530	\$44,272.49	\$2,487,617
GAP tracker balance as of yr-end	\$94,599.45	\$540,965.04	\$217,175	\$19,529.90	\$2,039,989
GAP rate-affordability surcharge (\$/therm)	\$0	\$0.00441	\$0.0049	\$0.0023	\$0.00400

## **CERTIFICATE OF SERVICE**

I, Linda Chavez, hereby certify that I have this day served copies of the following document on the attached list of persons by electronic filing, 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 - COMMENTS**

Docket Nos.   **E004/M-07-1235,**  
                  **G007,011/M-07-1131,**  
                  **G008/GR-05-1380,**  
                  **G001/M-07-1295,**  
                  **G002/GR-06-1429**

Dated this **30th** day of **May, 2014**.

/s/Linda Chavez

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Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_6-1429_1
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Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_6-1429_1