



414 Nicollet Mall
Minneapolis, Minnesota 55401

March 29, 2019

—Via Electronic Filing—

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

RE: ANNUAL REPORT
GAS AFFORDABILITY PROGRAM
DOCKET NO. G002/M-19-_____

Dear Mr. Wolf:

Enclosed for filing is our Gas Affordability Program Annual Report for 2018. 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. 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 Rebecca Eilers at rebecca.d.eilers@xcelenergy.com / 612-330-5570 or me at 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

Dan Lipschultz	Commissioner
Matthew Schuerger	Commissioner
Katie J. Sieben	Commissioner
John Tuma	Commissioner

IN THE MATTER OF NORTHERN STATES
POWER COMPANY'S 2018 ANNUAL GAS
AFFORDABILITY PROGRAM REPORT

DOCKET NO. G002/M-19-_____

ANNUAL REPORT

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) for 2018. 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. We respectfully request the Commission accept our 2018 Annual Report.

ANNUAL REPORT

Our Annual Report is structured as follows:

- I. Program Description
- II. Program Funding and Administration Costs
- III. Customer Payments, Disconnections, and Arrears
- IV. Retention, Satisfaction, and Collection Activity

We provide the 2018 GAP Tracker as Attachment A to this Report.

I. PROGRAM DESCRIPTION

The Program is designed to lower the percentage of income that low income households must devote to meet 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. The Program was approved by the Commission in the September 10, 2007 Order in Docket No. G002/GR-06-1429. We implemented the Program on February 1, 2008 in conjunction with final rates.

Effective December 26, 2009, we reduced the household income threshold devoted 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 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.

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 the Order, this report reflects both the non-GAP 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.

A. Program Eligibility

The GAP is available to any Minnesota Xcel Energy residential natural gas customer who is certified and receiving assistance from the Low Income Home Energy Assistance Program (LIHEAP) during the Program year.

Qualified 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. In an effort 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 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.

2. Arrearage Forgiveness

The Arrearage Forgiveness component is a matching 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.

As discussed in Section III below, Program participants paid a total of \$11,038,010 toward their energy costs during the 2018 Program year.¹ The average per participant payment amount was \$82 per month. We calculated this number by dividing total participant payments of \$11,038,010 by the overall participation count of 11,284. This

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

equals \$978 annually per participant, which divided by 12 months, equals an average of \$82 per GAP participant per month. The average monthly GAP participant payment amount increased compared to 2017, when the average monthly GAP participant payment amount was \$56. There was an increase in disbursements for GAP participants in 2018 because GAP credits are based on a customer's payment frequency and amount.

D. Program Year Enrollment

In 2018, we managed participation in the Program based on the tracker balance available, and continued outreach in an effort to increase spending, which resulted in an increase in participation numbers and disbursements compared to 2017. A total of 11,284 Xcel Energy customers participated in GAP at some point during the 2018 Program year, compared to 10,114 in 2017. Although the year-end participation numbers are lower compared to 2017, the payments and disbursements increased throughout 2018 compared to last year, and we see that trend to continue. The participation is directly related to managing the levels we had in the previous year and continuing outreach throughout 2018.

II. PROGRAM FUNDING AND ADMINISTRATION COSTS

We provide as Attachment A to this filing our GAP Tracker, which we also summarize in Table 1 below:

Table 1: GAP Tracker Summary	
Item	Amount
Tracker Balance as of December 31, 2017	\$658,482
Affordability & Arrearage Forgiveness Credits	\$2,224,152
Administrative Program Costs	\$103,558
Program Collections (per therm charge)	\$3,003,349
Tracker Balance as of December 31, 2018	\$1,334,120

A. Program Funding

The Program is funded by a per therm charge collected from all residential and most business customers. For 2018, the per therm charge was set at \$0.00445. In 2018, the average cost for a residential customer using 900 therms of gas per year was approximately \$4.01, or \$0.33 per month.²

² On average an Xcel Energy natural gas customer uses 940 therms of natural gas, which means the program cost per customer is \$4.18 annually, or \$0.35 per month.

B. Program Administration Costs

As shown in Table 1, our total Program costs for 2018 were \$2,327,710 (the Affordability and Arrearage Forgiveness Credits plus the Program Administrative Costs). Our total Program Administration costs for the 2018 Program year were \$103,558, under the allowed 5% cap.

C. Tracker Balance

Because the funding for this program is volumetric, the colder than usual weather we have experienced in recent months means that we have collected more dollars than is typical. These higher collections contribute to the higher tracker balance at the end of 2018. So far in 2019, we have seen more aggressive outreach result in increased program participation and higher spending. We expect to draw down the balance throughout 2019.

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 2018 results in Attachment B.³

A. Customer Payment Frequency

Table 2 below shows a comparison of the payment frequency for our 2018 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 were less than the total amount due for both electric and natural gas service during the billing period.

³ A new summary report format was proposed by the Utility Stakeholder Workgroup and approved in the Commission's September 28, 2018 Order in Docket No. G002/M-16-492. We note that this new report format replaces the attachment format originally required pursuant to the Commission's September 25, 2013 Order in Docket No. G002/GR-06-1429.

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

Table 2: 2018 Customer Payment Frequency Comparison						
2018	Amount Paid	Amount Requested	Percentage Paid of Requested	# of Payments Made	# of Payments Requested	Percentage Made of Requested
GAP Program Participants	\$11,038,010	\$11,236,258	98%	86,648	96,056	90%
Non-Participants on LIHEAP	\$20,548,924	\$21,587,381	95%	122,967	152,034	81%
Active Residential non GAP or LIHEAP	\$699,689,962	\$722,113,503	97%	4,244,842	4,591,591	92%

For comparison, Table 3 below shows the customer payment frequency data for 2017.

Table 3: 2017 Customer Payment Frequency Comparison						
2017	Amount Paid	Amount Requested	Percentage Paid of Requested	# of Payments Made	# of Payments Requested	Percentage Made of Requested
GAP Program Participants	\$10,430,639	\$10,699,353	97%	79,592	95,606	83%
Non-Participants on LIHEAP	\$16,266,000	\$17,398,739	93%	108,525	139,556	78%
Active Residential non GAP or LIHEAP	\$600,289,745	\$606,340,828	99%	3,933,593	4,247,737	93%

B. Disconnections

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

Table 4: Percentage Disconnected (Non-GAP LIHEAP Baseline Approach)		
Customer Category	2018	2017
GAP participants	2%	3%
LIHEAP recipients that do not participate in GAP	7%	7%
All Residential Natural Gas Customers (non-GAP, non-LIHEAP)	1%	1%

When comparing 2018 to 2017, we see a 1 percent decrease in disconnections for GAP customers and no change in disconnections for LIHEAP customers or residential customers.

Using the pre-Program baseline approach, we also see a decrease in disconnections. The percentage of customers disconnected pre-GAP were 5% percent and post-GAP was 1 percent.

C. Program Credits/Benefits

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

Table 5: GAP Participants Bills and Credits		
	2018	2017
Average GAP participant annual bill	\$1,366	\$1,251
Average GAP participant monthly bill	\$114	\$104
Average Annual Affordability benefit	\$180	\$205
Average Annual Arrearage Forgiveness benefit	\$200	\$32
Average Monthly Bill Credit per participant	\$23	\$20

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 \$1,481,413 divided by 8,224 participants. The Arrearage Forgiveness component is \$742,739 divided by 3,717 participants in arrears. The increase in arrearage forgiveness credits is due to consistent customer payments during their enrollment and the company matching the arrears credits earlier than 24 months. It is worth noting that not all participants receive a credit each month due to various scenarios – for example, moving, closed account or nonpayment.

D. Arrearage Level

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

Table 6: Average Arrearage Levels (Non-GAP LIHEAP Baseline Approach)		
Customer Category	2018 (As of September 30, 2018)	2017 (As of September 30, 2017)
GAP Participants	\$717	\$676
Natural Gas LIHEAP recipients not enrolled in GAP	\$512	\$394
All Natural Gas Residential Customers (non- GAP, non-LIHEAP)	\$304	\$246

The arrearage levels are based on a snapshot of distinct customer categories at a point in time based on whether they were active from October 1, 2017 through September 30, 2018. The average arrears levels increased for all customer categories in 2018. The increases can be attributed to weather, changes in usage patterns, the addition of customers with high arrears, and the timing of bill cycles.

Using the pre-Program baseline approach on the customer group who entered the GAP program during the 2018 year, we see a decrease to GAP participants' arrears levels compared to 2017, as shown in Table 7.

Table 7: Average Arrearage Levels (Pre-Program Baseline Approach)		
Average Arrears for GAP Participants with active Participation	2018	2017
Average Arrears 12 Months Prior to GAP Enrollment	\$339	\$361
Average Arrears 12 Months Post GAP Enrollment	\$363	\$411

Table 8 below shows the change between the total numbers of customers in arrears as of September 30, 2017 and 2018 to illustrate the effect of the GAP on the number of customers in arrears.

	# of Customers in Arrears 2018	# of Customers in Arrears 2017	% Change in # of Customers in Arrears
GAP	3,717	3,583	4%
Non-GAP LIHEAP	6,882	5,862	17%
Residential	46,789	41,205	14%

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 households and highest consumption;
- ECC updated their website to accept online applications;
- Participated in quarterly MN Energy Assistance Policy Action Committee;
- Participated in Safety Net Meetings with Ramsey County throughout 2018;
- Sent 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 2018 the PAR department received 51,795 phone calls with Minnesota agencies and households related to assistance and our programs resulting in referrals to energy assistance and bill payment assistance programs.

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 2018.

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.

Table 9: Program Participation and Application Rates		
Participation Rate	2018	2017
Xcel LIHEAP Recipients	21,094	23,126
Xcel GAP Participants	11,284	11,718
Participation rate %	53%	48%
Application Rate		
LIHEAP (Not Enrolled on GAP)	13,768	13,013
Total new Households applied for GAP	2,351	3,699
Application Rate %	17%	28%

The Program participation rate increased by 5% in 2018 compared to 2017, while the Program application rate decreased by 17% during that same timeframe. The application rate decrease can be attributed to the fact that some of these customers previously participated in the Program in 2018, dropped out or were removed, and then were later reinstated due to additional Program funding becoming available.

B. Retention

In 2018, a total of 3,060 participants were removed from the Program for various reasons, as summarized below. In order to compare 2018 Program retention to 2017, we summarize below the percent of total participants that left the Program for the various reasons in each of these years.

Table 10: Program Retention			
Program Removal Reason	Number of Customers Removed	Percentage of Total Program Removals	
		2018	2017
Non-Payment	1,759	57%	62%
Household Move	546	18%	18%
Ineligibility or Customer Request	755	25%	20%
<u>Credit Balance</u>	<u>0</u>	<u>0%</u>	<u>0%</u>
Total	3,060	100%	100%

Non-Payment is the primary reason participants leave the Program and this category decreased by 5% compared to 2017. 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. There was an increase in the ineligibility category for 2018, mainly due to customers not qualifying for LIHEAP, which is a requirement of the program.

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 review when their credit balance exceeds \$1,000. Then we bring the identified participant to the attention of ECC to develop a joint recommendation. 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 2018, 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 2018 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.

CONCLUSION

Xcel Energy requests the Commission to accept our Gas Affordability Program Annual Report for 2018.

Dated: March 29, 2019

Northern States Power Company

	Beginning of year life to date	2018												Current year to date	Current life to date balance
		January	February	March	April	May	June	July	August	September	October	November	December		
2018 Low Income Discount Program															
UMC 2974 MNGVA:[*Gas Affordability	(23,381,272.46)	(596,137.51)	(453,033.80)	(444,937.06)	(327,286.95)	(173,234.33)	(67,238.03)	(55,788.69)	(55,719.03)	(53,915.97)	(132,874.50)	(250,514.20)	(392,007.97)	(3,002,688.04)	(26,383,960.50)
Manually journaled surcharge on handbilled accts	(7,286.55)	(29.30)	(26.90)	(43.72)	(53.68)	(77.92)	(52.96)	(57.92)	(53.71)	(55.25)	(71.96)	(56.43)	(80.92)	(660.67)	(7,947.22)
A Total Billed		\$ (596,166.81)	\$ (453,060.70)	\$ (444,980.78)	\$ (327,340.63)	\$ (173,312.25)	\$ (67,290.99)	\$ (55,846.61)	\$ (55,772.74)	\$ (53,971.22)	\$ (132,946.46)	\$ (250,570.63)	\$ (392,088.89)		
UMC 2818 Arrearage Forgiveness MNGas:[*GAP Forgiv	1,548,279.82	19,089.00	12,624.00	14,462.00	16,926.52	37,482.19	269,379.03	51,464.30	52,066.57	77,345.00	47,126.81	38,515.07	106,258.68	742,739.17	2,291,018.99
UMC 1354 Affordability Credits MNGVC:[*GAP Affordat	19,994,301.91	155,721.00	124,857.00	138,525.00	124,295.00	119,237.00	89,030.00	122,644.00	137,964.00	99,759.00	127,951.00	122,096.00	119,334.00	1,481,413.00	21,475,714.91
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
see cell notes	14,422.00													-	14,422.00
B Total Disbursed		\$ 174,810.00	\$ 137,481.00	\$ 152,987.00	\$ 141,221.52	\$ 156,719.19	\$ 358,409.03	\$ 174,108.30	\$ 190,030.57	\$ 177,104.00	\$ 175,077.81	\$ 160,611.07	\$ 225,592.68	2,224,152.17	23,781,231.90
C Admin Program Costs	1,172,997.55	\$ 6,222.44	\$ 5,079.93	\$ 40,916.15	\$ 2,618.92	\$ 100.74	\$ 39,299.82	\$ 477.25	\$ -	\$ 1,270.42	\$ 5,801.00	\$ 1,771.38	\$ -	103,558.05	1,276,555.60
Monthly (over) under recovery		(415,134.37)	(310,499.77)	(251,077.63)	(183,500.19)	(16,492.32)	330,417.86	118,738.94	134,257.83	124,403.20	47,932.35	(88,188.18)	(166,496.21)	(675,638.49)	(1,334,120.22)
Tracker Balance Asset/(Liability)	(658,481.73)	(1,073,616.10)	(1,384,115.87)	(1,635,193.50)	(1,818,693.69)	(1,835,186.01)	(1,504,768.15)	(1,386,029.21)	(1,251,771.38)	(1,127,368.18)	(1,079,435.83)	(1,167,624.01)	(1,334,120.22)		

Data in this Attachment is based on calendar year 2018. Where applicable, the cohort group used was 12 months prior and 12 months after program enrollment.

2018	
Program dates and status	
Date program started	2/1/2008
Program effective date	1/1/2018
Date next evaluation report due	5/31/2019
Date last evaluation completed	5/31/2016
Last evaluation docket number	G002/M-16-493
Status of program (pilot or permanent)	Permanent
Date pilot program ends, if applicable	N/A
Date of last Evaluation Order	5/22/2017
Program administrator	Energy Cents Coalition
Participant benefits	
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	\$13,358
Average annual bill per participant	\$1,366
Average arrearage balance per participant	\$717
Average annual affordability benefit per participant	\$180
Average annual arrearage forgiveness benefit per customer	\$200
Average total benefit per participant	\$270
Cost and Cost Recovery	
Annual budget	\$2,500,000
Actual revenue	\$3,003,349
Annual cost	\$2,327,710
Surcharge (\$/therm)	\$0.00445 per therm
Annual cost of surcharge for average residential customer using 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	\$1,334,120
Participation	
% of LIHEAP customers that participated in GAP	42%
Number of participants enrolled as of year-end	6,390
Number of participants enrolled and receiving benefits at some time during the year	8,224
Whether a waiting list occurred at any time during the year	no
If so, the number of customers on the waiting list and for how long	n/a
Impact on disconnection rates	
Disconnection rates - non-GAP LIHEAP baseline	
GAP participants	2%
Non-GAP LIHEAP customers	7%
Non-LIHEAP residential customers	<1%
Disconnection rates - pre-program baseline	
GAP participant cohort	1%
GAP participants cohort before they were enrolled in GAP	5%
Impact on payment frequency	
Dollars paid + dollars requested	
Non-GAP LIHEAP Baseline	
GAP participants	98%
Non-GAP LIHEAP customers	95%
Non-LIHEAP residential customers	97%
Pre-Program Baseline	
GAP participant cohort	97%
GAP participant cohort before they were enrolled in GAP	89%
Number of payments made paid + number of payments requested	
Non-GAP LIHEAP baseline	
GAP participants	88%
Non-GAP LIHEAP customers	81%
Non-LIHEAP residential customers	92%
Pre-program baseline	
GAP participant cohort	84%
GAP participant cohort before they were enrolled in GAP	74%
Impact on arrears	
% Customers in arrears	
Non-GAP LIHEAP baseline	
GAP participants	45%
Non-GAP LIHEAP customers	51%
Non-LIHEAP residential customers	12%
Pre-Program baseline	
GAP participant cohort	64%
GAP participant cohort before they were enrolled in GAP	62%
Dollar amount of arrears	
% Change in dollar amount of arrears (non-GAP LIHEAP baseline)	
GAP participants	6%
Non-GAP LIHEAP customers	30%
Non-LIHEAP residential customers	24%
Dollar amount of arrears (pre-Program baseline)	
GAP participant cohort	\$1,267,307
GAP participant cohort before they were enrolled in GAP	\$1,019,210
Complaints	
Number of complaints	0
Nature of complaint(s)	N/A
Retention	
GAP participant retention rate	57%
Impact on collection activity	
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.
Coordination with other programs	
Page(s) of report where coordination efforts described	See the narrative report.

CERTIFICATE OF SERVICE

I, Jim Erickson, 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-19-____
MISCELLANEOUS GAS SERVICE LIST

Dated this 29th day of March 2019

/s/

Jim Erickson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@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
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 1800 St. Paul, MN 55101	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
Corey	Conover	corey.conover@minneapolismn.gov	Minneapolis City Attorney	350 S. Fifth Street City Hall, Room 210 Minneapolis, MN 554022453	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
Ian	Dobson	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
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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	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
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
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St 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
Peter	Madsen	peter.madsen@ag.state.mn.us	Office of the Attorney General-DOC	Bremer Tower, Suite 1800 445 Minnesota Street St. Paul, Minnesota 551017741	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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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
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
Zev	Simpser	simpser.zev@dorsey.com	Dorsey	50 South Sixth Street Suite 1500 Minneapolis, MN 55402-1498	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	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
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas