



February 26, 2021

VIA ELECTRONIC FILING

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

Re: In the Matter of the Petition for Approval of a Credit Mechanism to Return to Customers
Department of Energy Settlement Payments
Docket No. E002/M-21-69

Dear Mr. Sueffert:

Please find the attached Comments of the Energy CENTS Coalition in the above-referenced matter. If you have questions about these comments, please call me at 651-470-4500.

Sincerely,

Pam Marshall

Executive Director
Energy CENTS Coalition

**State of Minnesota
Before the Public Utilities Commission**

Katie Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

In the Matter of the Petition for Approval
of a Credit Mechanism to Return to Customers
Department of Energy Settlement Payments

Docket No. E002/M-21-69

Comments of the Energy CENTS Coalition

INTRODUCTION

The Energy CENTS Coalition (“ECC”) appreciates the opportunity to comment in this matter. According to Xcel Energy’s (“Xcel” or “the Company”) January 20, 2021 filing in this docket, the present estimated Department of Energy (“DOE”) Minnesota refund is \$9,589,930. Of this amount, the Company proposes to refund \$2,934,126 to the residential customer class, or \$2.49 for individual residential customers.

ALTERNATIVE RESIDENTIAL REFUND PROPOSAL

ECC respectfully recommends the Commission consider an alternative to the Company’s initial proposal. Specifically, ECC recommends that the Commission allow Xcel to use the residential class refund amount to supplement funding for the Company’s POWER On program. The POWER On program provides bill payment assistance to Xcel Energy customers that receive Low Income Home Energy Assistance Program (LIHEAP) grants. By combining these financial resources, Xcel’s lowest income customers receive a significant financial benefit. Participants in the POWER On program only pay three percent of their household income for electric bills. The program also includes an arrearage forgiveness component. Currently, customers are required to pay one-half of their past-due balances over a period of 12-24 months. However, Xcel anticipates filing a change to the program that would limit customer arrearage co-payments to no more than one percent of household income. This change will significantly increase program credits and participating customers’ ability to pay their electric bills.

The summary information below illustrates the effectiveness of the POWER On program to lower the energy burden of Xcel’s lowest income customers, to increase their ability to pay, and to protect them from service disconnections.¹

	Percentage of Payments Made	Average past-due bill	Service Disconnections
POWER On	79%	\$187	4%
LIHEAP only	59%	\$378	12%

Importantly, the average household income for POWER On participants is \$15,176, well below the Federal Poverty Level income of \$21,720 for a household with three members. Nearly 70% (69%) of all POWER On participants live below the established poverty level.²

ECC recommends that the Commission allow Xcel to apply the proposed DOE residential settlement refund to the POWER On tracker and, further, to allow the Company two years to spend the additional funds. The extended time-period is necessary to sufficiently promote the program and to enroll additional customers.

ECC’s recommends this alternative refund proposal for the following reasons:

- 1) The pandemic has disproportionately affected low-income households and when the current service disconnection moratorium ends, these customers are most likely to face service disconnection.
- 2) Xcel’s residential customer arrearages have increased from \$49.7 million in January 2020 to \$80.2 million in January 2021
- 3) The average Xcel residential customer past-due balance increased from \$295 to \$508 over that same time.
- 4) 157,858 Xcel residential customers are past-due.
- 5) Xcel combination natural gas and electric customers will be impacted by the recent natural gas price spike and this impact will be realized at approximately the same time as the current service disconnection moratorium ends, subjecting these customers to service disconnection. In addition, based on more typical natural gas prices, electric bills are often higher than natural gas bills.
- 6) An average residential credit of \$2.49 is insignificant to customers that can afford their energy bills and, at the same time, is insignificant to those who are significantly past-due. Increasing the ability of customers to maintain energy service is likely to provide a more significant financial benefit to all of Xcel’s residential customers.

¹ 2020 Annual Report Electric Low Income Energy Discount Program, Docket Nos. E002/M-04-1956 and E002/M-10-854, December 1, 2020.

² *Id.*

- 7) Given the current economic crisis, now exacerbated by exorbitant natural gas prices in February of this year, any available financial resources should be used to assist the most vulnerable customers.
- 8) The Commission has approved supplemental POWER On funding from previous DOE settlement funds.³

For the reasons stated above, and based on Commission precedent, ECC respectfully requests that the Commission allow Xcel to use residential DOE settlement credits to provide supplemental funding for the POWER On program.

Respectfully submitted,

February 26, 2021



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³ ORDER, In the Matter of a Petition by Xcel Energy for Approval of a Credit Mechanism for a Department of Energy Settlement Payment with Deferred Accounting, Docket No. E-002/M-11-807, December 16, 2011.

AFFIDAVIT OF SERVICE

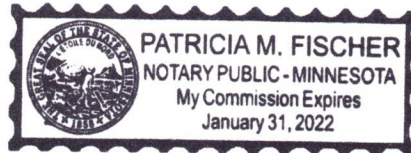
Pam Marshall certifies that on the 26th day of February 2021, she served, by electronic filing, Comments of the Energy CENTS Coalition In the Matter of the Petition for Approval of a Credit Mechanism to Return to Customers Department of Energy Settlement Payments, Docket No. E002/M-21-69, to the individuals on the attached service list.

Pam Marshall

Pam Marshall

Patricia M. Fischer

Patty Fischer



Subscribed and sworn to before me
this 26th day of February 2021

Notary Public

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