



CITIZENS UTILITY BOARD
Empowering Minnesota Consumers

332 Minnesota Street, Suite W1360
Saint Paul, MN 55101
www.cubminnesota.org
info@cubminnesota.org, 651-300-4701

September 9, 2024

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

VIA E-FILING

Re:

In the Matter of an Investigation and Audit of
Service Quality Reporting – Fraudwise Report

Docket No. E,G-002/CI-02-2034

In the Matter of the Petition of Northern
States Power Company d/b/a Xcel Energy for
Approval of Amendments to its Natural Gas
and Electric Service Quality Tariffs Originally
Established in Docket No. E,G-002/CI-02-2034

Docket No. E,G-002/M-12-383

Dear Mr. Seuffert:

The Citizens Utility Board of Minnesota (“CUB”) and the Energy CENTS Coalition (“ECC,” collectively, the “Joint Commenters”) respectfully submit this letter clarifying their updated positions regarding the disbursement of underperformance payments by Xcel Energy (“Xcel” or the “Company”) pursuant to the Company’s Quality-of-Service Plan tariff.

On June 28, 2024, the Joint Commenters submitted Initial Comments in this docket recommending the Commission approve Xcel’s petition to utilize 50 percent of the \$1 million penalty assessed against the Company to offset reconnection costs for residential customers.¹ Since then, Xcel filed an updated proposal offering to refund \$500,000 via direct credits to customers that “have a past due balance greater than \$5,000, have otherwise not received energy assistance, [and] have made a payment on their account within the prior 90-day time period.”² Credits would be applied to the oldest outstanding accounts first, with disbursements following one of the below methodologies:

¹ *In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Amendments to its Natural Gas and Electric Service Quality Tariffs Originally Established in Docket No. E,G-002/CI-02-2034*, Initial Comments of the Joint Commenters (Jun. 28, 2024) (hereinafter “Joint Commenters’ Initial Comments”).

² *In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Amendments to its Natural Gas and Electric Service Quality Tariffs Originally Established in Docket No. E,G-002/CI-02-2034*, Xcel Energy Reply Comments at 4-5 (July 12, 2024).



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1. Apply a \$1,000 payment toward the arrears balance of 500 customers;
2. Apply a \$500 payment toward the arrears balance of 1,000 customers; or
3. Provide credits of either \$500 or \$1,000 to customers that satisfy the above criteria and who live within specified low-income census groups.³

As articulated in our Initial Comments in this docket, the Joint Commenters are concerned about a rising trend in disconnections and have engaged with Xcel to improve the utility's policies and practices to better protect residential customers.⁴ We appreciate the Company's updated proposal and see it as an opportunity for customers to lower past due balances and potentially avoid disconnection in the first place. For this reason, we would prefer that the Commission approve one of the above options instead of directing Xcel to offset reconnection costs. Specifically, we believe Option 1—to apply a \$1,000 payment towards the arrears balance of 500 customers—is an appropriate method for disbursing the assessed penalty. By significantly reducing these customers' past due balances, a more affordable payment agreement can be established that allows the household to retain service and pay down arrears over time.

Sincerely,

/s/ Annie Levenson-Falk

Annie Levenson-Falk
Executive Director
Citizens Utility Board of Minnesota
651-300-4701, ext. 1
annielf@cubminnesota.org

/s/ George Shardlow

George Shardlow
Executive Director
Energy CENTS Coalition
george@energycents.org

/s/ Olivia Carroll

Olivia Carroll
Regulatory Advocate
Citizens Utility Board of Minnesota
651-300-4701, ext. 5
oliviacc@cubminnesota.org

/s/ Brandon Crawford

Brandon Crawford
Regulatory Advocate
Citizens Utility Board of Minnesota
651-300-4701, ext. 7
brandonc@cubminnesota.org

cc: Service List

³ *Id.* at 5.

⁴ Joint Commenters' Initial Comments at 2-3.