


Staff Briefing Papers

Meeting Date	January 18, 2023	Agenda Item *2
Company	Northern States Power Company dba Xcel Energy – Electric	
Docket No.	E-002/M-04-1956 In the Matter of a Petition for Approval of a Modification to Low-Income Discount Program	
	E-002/M-10-854 In a Matter of a Petition for Low Income Energy Discount Rider Funding	
Issues	1. Should the Commission approve Xcel Energy’s September 1, 2023 request to transfer \$5.6 million in funds from the Medical Affordability Program (MAP) to the PowerON program?	
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 Relevant Documents	Date
Xcel Energy Petition	September 1, 2023
Department of Commerce, Division of Energy Resources Comments	October 25, 2023
Citizens Utility Board Comments	October 25, 2023
Energy CENTS Coalition Comments	October 25, 2023
Xcel Energy Comments	October 25, 2023
Citizens Utility Board Reply Comments	November 15, 2023
Energy CENTS Coalition Reply Comments	November 15, 2023
Xcel Energy Reply Comments	November 15, 2023

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The attached materials are work papers of the Commission Staff. They are intended for use by the Public Utilities Commission and are based upon information already in the record unless noted otherwise.

✓ **Relevant Documents**

	Date
Xcel Energy 2023 Annual Report on Low-Income Discount Programs	December 1, 2023
Xcel Energy Supplemental Comments	December 6, 2023
Department of Commerce, Division of Energy Resources Comments	December 20, 2023

I. Statement of Issues

Should the Commission approve Xcel Energy's September 1, 2023 request to transfer \$5.6 million in funds from the Medical Affordability Program (MAP) to the PowerON program?

II. Xcel's Low-Income Affordability Programs

Xcel Energy (Xcel or the Company) offers multiple low-income affordability programs. The programs are available to customers that receive energy assistance from the Low-Income Home Energy Assistance Program (LIHEAP). For context, Staff provides a short description of each program below.

PowerON

Xcel's PowerOn program offers qualified households two discount components:

- 1) Limits monthly bill to 3% of household income; and
- 2) Forgives past-due bills (or arrears) for up to 24 months.¹

PowerON requires an application to participate in the program and is administered by the Energy CENTS Coalition (ECC).

In Xcel's 2022 Gas Affordability Program (GAP)² proceeding, the Commission ordered Xcel to automatically enroll LIHEAP recipients in GAP.³ Xcel has chosen to automatically enroll LIHEAP electric customers that also receive natural gas service in PowerOn as well, but still giving customers the ability to opt-out. Xcel is anticipating "a 32 percent response rate through the PowerON Program autoenrollment process" as compared to the 15-20 percent response rate when Xcel was relying on traditional outreach methods.⁴

Low Income Discount

Xcel provides a \$15 monthly discount, the Low Income Discount (LID), to customers that are LIHEAP-recipients and either disabled or 62 years of age or older.⁵

Medical Affordability Program (MAP)

Xcel customers can participate in MAP if they receive LIHEAP benefits or have an income that is less than or equal to 60% of the state median income *and* are certified by a medical professional that the customer requires electric medical equipment or is currently experiencing

¹ [Minn. Stat. § 216B.16 Subd. 15 Low-income affordability programs.](#)

² GAP is the natural gas equivalent of the electric low-income affordability programs.

³ 22-257 Order, January 18, 2023, Order Points 13-15, p. 3.

⁴ Xcel petition, September 1, 2023, p. 5.

⁵ [Minn. Stat. § 216B.16 Subd. 14 Low-income electric rate discount.](#)

a medical emergency.⁶ The benefits of MAP mimics PowerON's benefits.

Table 1 provides a selection of relevant statistics about each program:

Table 1: Statistics about Xcel's Affordability Programs (Through October 31, 2023)⁷

Statistics	PowerON	LID	MAP
Average annual income	\$16,503	Not reported	\$18,975
Average annual bill	\$1,321	\$1,020	\$1,037
Average arrearage balance	\$973	\$798	\$2,204
Average monthly affordability benefit	\$80	N/A	\$98
Average monthly arrearage forgiveness benefit	\$12	N/A	\$67
Average annual benefit	\$505	\$175	\$859
LIHEAP customers that participated (%)	41%	59%	2%
Difference in participation from 2022 (as of October 31 st)	4,435	-8,601	-27
Increase or decrease in arrears over year (%)	16%	-3%	11%
Rate of participants that were disconnected (%)	2%	2%	5%
Customers retained on program from previous year (%)	75%	79%	74%

Pending Programs

1) *Low Income, Low Usage Program*

Energy CENTS Coalition (ECC) proposed a discount program for low-income residential customers with low energy usage in Docket No. E002/GR-21-630 (Xcel's 2021 Rate Case). Xcel worked with ECC on formulating the program outline. In Order Point 63 of the Commission's

⁶ [Minn. Stat. § 216B.098 Subd. 5 Medically necessary equipment.](#)

⁷ 04-1956/10-854 2023 Annual Report, December 1, 2023, Attachments B and C.

July 17, 2023 Order, the Commission ordered Xcel to implement the Low Income Low Usage (LILU) program. Order Point 64 required Xcel to make the program available on October 1, 2023 and report on it on December 1, 2023 and annually thereafter.⁸

The LILU is a program for residential customers at or below 50% of the state median income guideline with an annual average monthly usage of 300 kWh or less. The program provides a 35% discount per kWh paid on the following month's bill. Customers with the required income level and usage history will be automatically enrolled in the LILU. Xcel estimates that 87,000 customers will be able to enroll in the program, and recovery will be done through Xcel's Low-Income Energy Discount Rider.⁹

2) High Energy Burden Program

Xcel has been working with the Minnesota Equity Stakeholder Advisory Group (ESAG) on a new program for an automatic discount to areas with high energy burdens. Xcel says that this will assist low-income customers, many of whom are not receiving LIHEAP or PowerON benefits. Xcel plans to file a petition with the Commission in Q1 2024.¹⁰

III. Proposal

Xcel Energy is requesting approval to transfer \$5.6 million from its Medical Affordability Program (MAP) fund to its PowerON program fund (**Decision Option 1**). Xcel consulted with ECC and CUB, who agreed that leaving MAP with a \$3 million tracker balance after the proposed transfer is prudent.¹¹

Xcel says that this will fill a need for PowerON funds while utilizing unspent funds in MAP.¹² Xcel combines the PowerON and the Monthly Discount Program budgets to ensure the needs of each program is met,¹³ but MAP maintains its own program funding. Table 2 provides the cost and cost recovery for each of Xcel's low-income programs.

Table 2: Current Program Costs and Cost Recovery (2023)

		PowerON	LID	MAP
Annual Budget		\$3.5 million	\$10.2 million	\$3 million
Actual Revenue (as of October 31, 2023)		\$2,950,936	\$8,470,526	\$2,666,854
Monthly Surcharges by	Residential	\$0.20	\$0.47	\$0.18
	C&I Non-Demand	\$0.20	\$0.47	\$0.18

⁸ 21-630 Order, July 17, 2023, Order Points 63 and 64, p. 160.

⁹ 23-476 Xcel compliance filing, October 17, 2023.

¹⁰ Xcel comments, October 25, 2023, p. 6.

¹¹ Xcel comments, October 25, 2023, p. 5.

¹² Xcel petition, September 1, 2024, Cover page.

¹³ 12-961 September 3, 2013 Commission Order, Point 19, p. 48.

Customer Class	C&I Demand	\$0.89	\$2.04	\$0.80
Actual Cost (as of October 31, 2023)		\$11,147,071	\$5,152,505	\$502,984
Tracker Balance (as of October 31, 2023)		\$0	\$131,671	\$9,261,149

PowerON participation has seen an increase, while MAP participation has decreased. There was an increase of 7,000 active participants in 2022 for a total of approximately 22,000 customers in PowerOn. Despite outreach efforts, there were less than 700 MAP participants in 2022.¹⁴ Xcel predicts that PowerON participation will double in the coming year, which will necessitate a higher budget. In 2023, the average monthly spending of PowerON is \$1 million; in comparison, MAP's monthly spending is \$70,000. Xcel consulted with ECC and CUB, who agreed that leaving MAP with a \$3 million tracker balance is prudent.¹⁵

IV. Party Comments

A. Initial Comments

1. Xcel Energy

In addition to its \$5.6 million transfer request, Xcel is now asking for an annual increase to the PowerON budget of \$14.5 million to sustain the program (**Decision Option 2**).¹⁶ Table 3 shows the current and newly proposed budgets:

Table 3: Xcel's Affordability Program Current and Proposed Budgets (in million dollars)¹⁷

	PowerON	LID	Combined PowerON & LID	MAP	LILU	Total
Current Annual Budget	~\$3.5	~\$10.2	~\$13.7	\$3.0	\$8.3	\$25.0
Proposed Increase	\$14.5	N/A	\$14.5	N/A	N/A	\$14.5
Proposed Annual Budget	\$18.0	\$10.2	\$28.2	\$3.0	\$8.3	\$39.5

An increased budget would result in increases to the PowerON customer surcharges as well. As

¹⁴ Xcel petition, September 1, 2024, p. 4.

¹⁵ Xcel comments, October 25, 2023, p. 5.

¹⁶ Xcel comments, October 25, 2023, p. 1. Note that in its October 25, 2023 comments, Xcel Energy mistakenly proposed an additional \$14.5 million be added to the PowerON budget. In its reply comments, Xcel corrected that it is requesting a new total PowerON budget of \$14.5 million. The correct number has been used in this section to avoid confusion.

¹⁷ Xcel comments, October 25, 2023, Table 2, p. 5.

shown in Table 4, the surcharges for Residential and Commercial and Industrial (C&I) Non-Demand customers would increase to \$0.83 while C&I Demand surcharges would increase to \$3.56.¹⁸

Table 4: Proposed Monthly PowerON Customer Bill Impact by Class¹⁹

Customer Class	Current PowerON Surcharge	PowerON Surcharge in Compliance with 21-630 Rate Case	PowerON Surcharge in Compliance + Proposed \$14.5M Increase ²⁰	Impact of Proposed \$14.5M Increase
Residential	\$0.21	\$0.20	\$1.03	\$0.83
C&I Non-Demand	\$0.26	\$0.20	\$1.04	\$0.83
C&I Demand	\$0.66	\$0.89	\$4.45	\$3.56

Xcel has another new proposal. Two years following Commission approval of the \$14.5 million increase to the PowerON budget and the tracker balance exceeds \$5 million, the Company will transfer \$2 million to the LID fund at the end of federal fiscal year (**Decision Option 4**).²¹ Staff presumes that the end of the federal fiscal year two years after Commission approval would be FY2025-2026, ending September 26, 2026. Xcel has spoken with CUB and ECC about this additional proposal, and both support it.²²

2. Department of Commerce

The Department states that MAP participation has decreased to an all-time low of 1,073 customers in 2021. Accordingly, MAP credits provided has also hit an all-time low of \$908,647 in 2021. In 2020, MAP disbursed \$3.1 million to participants, as compared to \$1.5 million in 2019. Xcel credits these numbers as the reasoning behind the requested transfer of \$5.6 million from PowerON to MAP.

Regarding Xcel's suggestion to increase the PowerON budget (**Decision Option 2**), the Department notes that "PowerON and Discount are already effectively funded on an aggregate basis."²³ Also, there is no strict requirement to set \$3 million aside annually for MAP. Therefore, the Department proposes combining the three budgets into one instead (**Decision Option 3**). Then the recovery amount can be adjusted as needed.

The Department says that "a negative tracker balance is not necessarily a problem since the

¹⁸ Xcel comments, October 25, 2023, Table 3, p. 6.

¹⁹ Xcel comments, October 25, 2023, Table 3, p. 6.

²⁰ The monthly decrease is due to a net of the decreased monthly customer charge and the addition of the Low-Income Low Usage program from the 21-630 Rate Case.

²¹ Xcel comments, October 25, 2023, p. 4.

²² CUB comments, October 25, 2023, p. 2; ECC comments, October 25, 2023, p. 6.

²³ Department comments, October 25, 2023, p. 6.

tracker appears to have a carrying charge” and believes that Xcel could still made whole.²⁴ Therefore, PowerON and the LID could continue without interruption if the tracker balance is depleted unless there is a positive tracker balance requirement, which the Department is not aware of.

The Department provided a final recommendation in its reply comments after requesting more information from the Company.

3. Energy CENTS Coalition

ECC gives more information on the average PowerON participant. Their income is significantly lower than the LIHEAP income-eligible amount and their average energy burden is higher as well. Energy burden is defined as the percentage of income spent on energy costs. 68% of PowerON customers have an energy burden of 13%.

ECC supports Xcel’s proposal to transfer funding to PowerON (**Decision Option 1**).²⁵ ECC believes that the remaining \$3 million MAP tracker balance will be adequate to fund MAP for approximately three years.

ECC also supports increasing the PowerON budget, which is needed to accommodate increased participation and subsequent spending (**Decision Option 2**). Between January 1, 2023 and October 1, 2023, PowerON participation increased from 14,713 customers to 22,887; actual monthly program spending increased from \$804,674 to \$1,409,172.²⁶ ECC says Xcel’s proposal is needed, because LIHEAP customers are being automatically enrolled in both GAP and PowerON if they have both natural gas and electric service. If Xcel’s proposal is not approved, ECC says that the “only alternative is to close the program to new applicants and to establish a waiting list.”²⁷

4. Citizens Utility Board

The Citizens Utility Board of Minnesota (CUB) supports Xcel’s proposal to move funds from the MAP fund to PowerON (**Decision Option 1**). CUB says that more funding for PowerON is necessary due to increased enrollment.²⁸

B. Reply Comments

1. Xcel Energy

Xcel’s final proposed budgets are as followed:

²⁴ Department comments, October 25, 2023, p. 6.

²⁵ ECC comments, October 25, 2023, p. 1.

²⁶ ECC comments, October 25, 2023, p. 2.

²⁷ ECC comments, October 25, 2023, p. 3.

²⁸ CUB comments, October 25, 2023, p. 1.

Table 5: Xcel's Electric Affordability Program Portfolio (in millions)²⁹

	PowerON	LID	MAP	LILU	Total
Proposed Annual Budget	\$14.5	\$10.2	\$3.0	\$8.3	\$36.0

The Department asked the Company about the \$2.0 million annual PowerON allocation from the 2017 federal Tax Cut and Jobs Act (TCJA).³⁰ Xcel says that it was in effect from 2018 – 2021 at \$166,000 per month.

Without increasing the PowerON budget, Xcel says that the PowerON Program will continue to grow at a forecasted rate of \$13.4 million in 2024 and \$15.5 million in 2025 without an opportunity to recover. In response to the Department, Xcel projected future PowerON program budgets as follows:

Table 6: Projected PowerON Budget (2022-2025)³¹

Year	Total Program Cost	Annual Budget	Forecasted Shortfall ³²
2022	\$9,682,693	\$9.0 – 10.0 million	N/A
2023	\$13,321,083	\$13.0 – 14.0 million	N/A
2024 Forecast	\$14,996,937	<i>Proposed</i>	-\$13.4 million
2025 Forecast	\$17,306,732	<i>Proposed</i>	-\$15.4 million

The Company says that it will continue to monitor the Low-Income Discount Rider tracker balance and will request an adjustment as needed. Therefore, Xcel is requesting that if, after two years, the PowerON balance exceeds \$5 million, it may provide a \$2 million one-time increase to the LID monthly credit (**Decision Option 4**).

2. Energy CENTS Coalition

ECC believes that a long-term funding solution is required to meet the programs' needs. ECC supports Xcel setting an annual PowerON budget of \$14.5 million (**Decision Option 2**).³³ However, the current expense for PowerON is much higher than its revenue due to increased participation.

ECC gives several reasons as to why establishing a \$14.5 million PowerON budget is appropriate:

²⁹ Xcel reply comments, November 15, 2023, Table 1, p. 2.

³⁰ 17-895 Order, December 5, 2018, Point 1A, p. 13.

³¹ Xcel reply comments, November 15, 2023, Table 3, p. 4.

³² The forecasted shortfalls in 2024 and 2025 if the PowerON budget is not increased to \$11.5 million.

³³ ECC reply comments, November 15, 2023, p. 1.

- 1) The number of Xcel's LIHEAP customers have increased, which means that more customers are eligible for both LID and PowerON.
- 2) The combined LID and PowerON tracker balance is negative.
- 3) A record number of customers are participating in both programs.
- 4) The current average monthly PowerON credit amount has increased to \$101 in 2023 from \$84 in 2022.
- 5) The PowerON surcharge has not increased since January 1, 2014.
- 6) If the PowerON tracker balance exceeds \$5 million after operating for two years at a \$14.5 million annual budget, Xcel is proposing to transfer a \$2 million surplus PowerON revenue to provide supplemental benefits to LID participants.³⁴

ECC respectfully disagrees with the Department's proposed solution to combine all three budgets into one, saying:

Xcel is obligated to enroll all eligible customers in the discount program. As such, and as noted by the Department, there is no actual annual budget for the discount program.³⁵

In response to the Department's statement that there is not an issue with a negative tracker balance, ECC instead supports increasing the PowerON surcharge, writing:

While a negative tracker balance may have seemed less problematic when spending for PowerON was \$3.6 million per *year*, the program is now spending \$1.5 million per *month*.³⁶

3. Citizens Utility Board

CUB says that a long-term funding solution is needed to maintain the effectiveness of PowerON. Within the last ten years, PowerON participation has nearly tripled, and monthly credits have almost doubled. CUB mentions that PowerON spending has increased from \$800,000 to \$1.4 million in the past year. Therefore, "CUB views the requested budget increase as a necessary and prudent modification."³⁷

CUB supports Xcel setting the PowerON budget at \$14.5 million (**Decision Option 2**). CUB notes that this will require the Low-Income Energy Discount Rider surcharge to be subject to a moderate increase.³⁸

³⁴ ECC reply comments, November 15, 2023, p. 4.

³⁵ ECC reply comments, November 15, 2023, p. 5.

³⁶ ECC reply comments, November 15, 2023, p. 5. Emphasis from party.

³⁷ CUB reply comments, November 15, 2023, p. 3.

³⁸ CUB reply comments, November 15, 2023, p. 4.

C. Supplemental Reply Comments

1. Xcel Energy

Xcel provided more information about the Low-Income Energy Discount Rider by customer class, including the LILU charge, as compared to the current Rider charge, as shown in Table 7:

Table 7: Impact of \$11M PowerON Budget Increase + Final Rates Compliance + LILU³⁹

Customer Class	Current Rider Charge	Base Rate	PowerON	MAP	LILU	Total Rider Charge	Increase to Rider
Residential	\$0.85	\$0.65	\$0.82	\$0.18	\$0.47	\$2.12	\$1.27
C&I Non-Demand	\$0.85	\$0.65	\$0.82	\$0.18	\$0.47	\$2.12	\$1.27
C&I Demand	\$3.73	\$2.80	\$3.56	\$0.80	\$2.04	\$9.20	\$5.47

2. Department of Commerce

The Department agrees with the other parties that the one-time transfer of \$5.6 million would provide enough funding for current and future MAP participants, but the Department sees this as a short-term solution.

In the long-term, the Department continues to recommend combining the PowerON, LID, and MAP budgets (**Decision Option 3**). The Department justifies this suggestion as such.⁴⁰ Xcel is already combining tracker recovery for the PowerON and LID programs and funding the programs from the joint tracker. The Department says that this has simplified administration of both programs and reduced regulatory review and would extend these benefits to MAP. The Department suggests that disbursements, customer information, and revenue be tracked separately, except for the tracker recovery, which would be combined. Then a lack of funding for PowerON is a non-issue in the short term and would eliminate the need for future tracker balance transfers.

Therefore, the Department recommends that:

... as an alternative to Xcel's request to transfer \$5.6 million, instead require Xcel to combine tracker recovery for all programs under Xcel's Low-Income Energy Discount Rider.⁴¹

The Department states that this would not have an impact on customer enrollment and would reduce regulatory and administrative costs.

³⁹ Xcel supplemental comments, December 6, 2023, Table 2, p.2.

⁴⁰ Department supplemental comments, December 20, 2023, p. 5.

⁴¹ Department supplemental comments, December 20, 2023, p. 5.

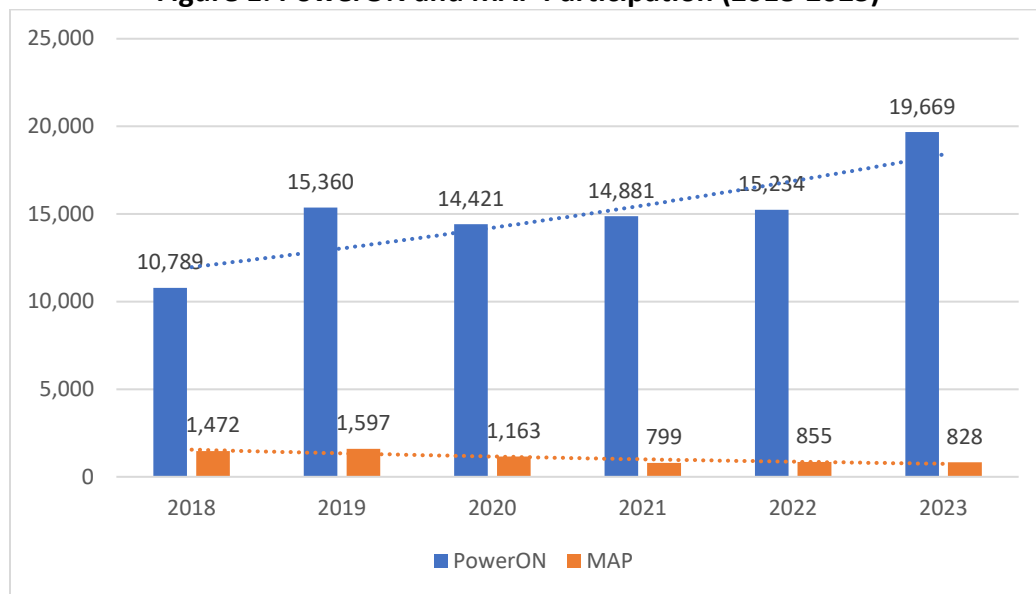
The Department does not have any objections to Xcel's proposed surcharge increase and says that it would be unreasonable not to fund it (**Decision Option 2**).⁴²

The Department does not support Xcel's future transfer proposal (**Decision Option 4**) and does not believe it is warranted. It is not clear to the Department how the \$2 million would be dispersed or why \$2 million is the reasonable number. Further, the Department is not sure that such a measure is consistent with Minn. Stat. § 216B.16 Subd. 14 for the LID. Therefore, the Department recommends that the Commission take no action on future balance transfers.

V. Staff Analysis

Now that Xcel has begun automatic enrollment of eligible customers with both electric and natural gas service into the PowerON program, Staff finds a demonstrated need for more funding. In the last four years, participation in PowerON has hovered at approximately 15,000 customers. Automatic enrollment began in summer 2023. As of October 31, 2023, 19,669 customers were participating in PowerON. Meanwhile, MAP participation has dropped to below 1,000 customers. These two trends are shown in Figure 1 below.

Figure 1: PowerON and MAP Participation (2018-2023)⁴³



Staff reiterates a point raised by ECC in initial comments. The majority of PowerON customers have an energy burden of more than 13%. When a household spends more than 6% of income on energy bills, they are considered to have a high energy burden,⁴⁴ indicating these are the customers are the most at need for assistance.

Xcel's first, original request was to transfer \$5.6 million from the MAP fund to the PowerON fund (**Decision Option 1**). Staff also believes that leaving \$3 million in the MAP fund is enough

⁴² Department supplemental comments, December 20, 2023, pp. 5-6.

⁴³ 04-1956/10-854 2023 Annual Report, December 1, 2023, Attachments B and C.

⁴⁴ [ACEEE Energy Burdens in Minnesota](#).

to continue providing benefits to medically vulnerable customers.

Staff concurs with the Company and all parties that the \$5.6 million transfer is a good first step but that a more long-term solution is needed. Two long-term funding solutions were recommended by parties:

1) *Decision Option 2*

Xcel proposed that its PowerON budget be increased to \$14.5 million with an increased surcharge to the Low Income Energy Discount Rider.⁴⁵ CUB and ECC support Decision Option 2. Staff finds the new surcharge rates to be prudent and not burdensome to residential customers.

In Table 6 of the briefing papers with PowerON's projected budgets, there will be \$13.4 million and \$15.4 million shortfalls in 2024 and 2025, respectively. Staff notes that Xcel's proposal to increase the budget to \$14.5 million will cover the Company's costs in 2024; however, according to Xcel, there will still be a \$900,000 shortfall in 2025.

2) *Decision Option 3*

The Department recommended in its October 25, 2023 comments that the PowerON, LID, and MAP trackers be combined into one. The Department said that combining tracker balances would simplify processes if Xcel needs to move money between program budgets, and that it would reduce regulatory oversight as the Commission would not be required to review and approve movement between program budgets.

An alternative solution could be requiring Xcel to report budget movements. Therefore, Staff has offered **Decision Option 3a** so the Commission can keep track of movement of funds between budgets.

No other parties support this decision option.

Xcel recommended a tracker balance transfer to the LID balance if the PowerON balance exceeds \$5 million (**Decision Option 4**). ECC and CUB support this measure, but the Department does not.

⁴⁵ In its October 25, 2023 comments, Xcel stated that it was seeking an additional \$14.5 million increase to its PowerON budget. In its November 15, 2023 reply comments, Xcel clarified that it is actually seeking a new total PowerON budget of \$14.5 million. Thereby, increasing the PowerON budget by \$11 million.

VI. Decision Options

Staff supports Decision Options 1, 2, and 4. Staff makes no recommendation regarding Decision Option 3 but does recommend the Commission choose Decision Option 3a if it chooses Decision Option 3.

1. Approve Xcel Energy's request to transfer \$5.6 in surplus funds from the Medical Affordability Program to the PowerON program. *(Xcel, CUB, ECC, DOC)*
2. Approve Xcel Energy's request to increase the PowerON annual budget to \$14.5 million. *(Xcel, CUB, ECC, DOC)*
3. Require Xcel Energy to combine the PowerON, Low-income Discount, and Medical Affordability Program budgets and continue tracking each budget separately. *(DOC)*

[If the Commission chooses Decision Option 3, the Commission may also choose Decision Option 3a.]

- a. Require Xcel Energy to report on movement of funds between program budgets in its annual reporting. *(Staff)*
4. Approve Xcel Energy's request to have the option to transfer \$2 million from the PowerON program to the Low-Income Discount program at federal fiscal year-end **if** after two years at a \$14.5 million annual budget, the PowerON tracker balance exceeds \$5 million. *(Xcel, ECC, CUB)*