

September 17, 2021

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

RE: Comments of the Minnesota Department of Commerce, Division of Energy Resources
Docket No. E,G999/CI-20-375

Dear Mr. Seuffert:

On September 9, 2021, the Minnesota Public Utilities Commission issued a *Notice of Comment Period* on whether it should approve the Minnesota Housing and Finance Agency's request to have applicants to its rental and utility assistance program RentHelpMN included in the list of programs protected from utility disconnection until April 30, 2022.

On September 15, 2021, comments were filed by Consumer Advocates¹, Community Mediation Minnesota (CMM), Violence Free Minnesota (VFM), African Career, Education and Resource Inc. (ACER), a group of utilities and Dakota Electric Association².

CMM serves as a Program Administrator to MHFA in administering financial assistance for rental, mortgage and utility assistance to low-income households. CMM, VFM and ACER all voiced support for the inclusion of MHFA's RentHelpMN program in the Commission's May 26, 2021 Order³ for protection of utility disconnection until April 30, 2022.

¹ Consumer Advocates include the Citizens Utility Board of Minnesota (CUB), the Legal Services Advocacy Project (LSAP), the EnergyCents Coalition (ECC) and HOME Line.

² CenterPoint Energy Minnesota Gas, Greater Minnesota Gas, Xcel Energy, Great Plains Natural Gas, Minnesota Energy Resources Corp, Minnesota Power, and Otter Tail Power Company. Dakota Electric Association (DEA) filed separate comments on September 10, 2021. DEA's comments were consistent with those voiced by the larger group of utilities, and is included in any reference made to the utility group position.

³ *In the Matter of an Inquiry into Actions by Electric and Natural Gas Utilities in Light of the COVID-19 Pandemic Emergency*, ORDER ADOPTING BROAD TRANSITION PLAN PROPOSAL, SUSPENDING NEGATIVE REPORTING AND ESTABLISHING NOTICE AND COMMUNICATION REQUIREMENTS. Docket No. E999/CI-20-375, May 26, 2021.

Both the Consumer Advocates and utilities are supportive of extending disconnection protection to applicants to the RentHelpMN program, but voiced concerns on the ability of utilities to verify applicants to MHFA's program. Utilities currently access information regarding Low Income Heating Assistance Program (LIHEAP) participants/applicants through the Department's eHeat portal. No such system is currently in place for the RentHelpMN program.

The Consumer Advocates recommend that MHFA make application and eligibility data directly accessible to utilities. If direct access is not possible, then the Consumer Advocates recommend MHFA provide contact information for all local administrators of the assistance funds available to utilities. The Consumer Advocates also recommend that MHFA notify its program applicants of the availability of other assistance through LIHEAP, and the terms of protection offered by the Cold Weather Rule.

The utilities share the concerns of the Consumer Advocates, and possible unintended consequences for receipt of LIHEAP assistance or other complementary assistance programs. The utilities request MHFA provide additional information on how MHFA will provide the information necessary to verify application status to the RentHelpMN program.

The Department has reviewed the comments of other parties and is generally in agreement that applicants to the MHFA program should be protected from disconnection. First and foremost, the Department wants customers to receive the assistance they need, and with the start of a new heating season upon us, to ensure that customers are not harmed.

The Department requests that MHFA address the extent to which program applicants may already be protected through other avenues and the processes by which it will provide utilities with the information necessary to protect RentHelpMN applicants from disconnection. In addition, the Department requests that MHFA address how it notifies applicants of other assistance such as LIHEAP and the protections of the Cold Weather Rule.

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

Sincerely,

/s/Susan L. Peirce
Rate Analyst Coordinator

SLP/ar

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, 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
Letter**

Docket No. E, G999/CI-20-375

Dated this 17th day of September 2021

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-375_Official Service List
Gabriel	Chan	gabechan@umn.edu	University of Minnesota	130 Hubert H. Humphrey Center 301 19th Ave S Minneapolis, Minnesota 55455	Electronic Service	No	OFF_SL_20-375_Official Service List
Christopher	Clark	Christopher.B.Clark@xcelenergy.com	Xcel Energy	414 Nicollet Mall 5th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-375_Official Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-375_Official Service List
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-375_Official Service List

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