

STATE OF MINNESOTA
BEFORE THE PUBLIC UTILITIES COMMISSION

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

In the Matter of the Petition by CenterPoint
Energy and the City of Minneapolis to
Introduce a Tariffed on Bill Pilot Program

MPUC DOCKET NO. G-008/M-21-377

**REPLY COMMENTS OF THE
SUBURBAN RATE AUTHORITY**

INTRODUCTION

The Suburban Rate Authority (“SRA”) submits this reply to the comments on the proposed Tariff on Bill pilot program (“TOB”) by CenterPoint Energy (“CPE”) and the City of Minneapolis (“Minneapolis”) for Commission approval (“Petition”).

For the reasons stated below, the SRA cannot support the Petition as submitted. There are too many articulated legal and operational detail problems not resolved or addressed in the Petition. These problems are pointed out and thoroughly described by parties that traditionally support the customers and families TOB is intended to benefit. While numerous parties advocate for approval of the Petition, most condition support on numerous modifications that CPE has consistently rejected. Others support it as a program that has worked in others states without the close analysis of TOB itself.

Nor has CPE has demonstrated that TOB is intended or ready for a CPE system-wide pilot that is balanced in its use of budgeted funds for potential applicants across its service territory. It is possible, CPE will do so in its reply comments. Yet, the TOB costs, legal risks and strong opposition still present at this late stage of a second chance docket solidify the SRA’s reluctantly reached opposition to TOB, independently of an actual, balanced territory wide TOB plan.

REPLY

The SRA described its concerns with the Petition in its initial comments and expressly awaited the comments of other interested parties to answer certain questions.¹ Those questions have regrettably been answered almost entirely in the negative, as summarized below.

A. Support for this TOB is Conceptual and Not Specific to the Petition’s Operational and Legal Hurdles

TOB has zealous supporters. The SRA reviewed comments and replies from the significant list of organizations urging adoption of TOB and its “inclusive financing” feature.² Most supporters do not address TOB’s specifics but identify a need, which the SRA shares – additional opportunities for low- and moderate-income households gaining access to capital for dwelling energy efficiency improvements. The inclusive financing and apparent success of the PAYS format in other states is highlighted by multiple parties. For example, Renew Missouri (“RM”) supports TOB because of the apparent success of a similar program in Missouri among investor-owned gas and electric utilities.^{3 4 5} Similarly, Climate + Energy Project (“CEP”) submitted a January 10, 2022, comment citing 12 years of a PAYS program serving approximately 30,000 customers in central and western Kansas. TOB should not be approved solely on policy goals or claimed PAYS success in other states, however. TOB must work here and at a fair cost equitably paid by all CPE stakeholders in TOB eligible areas.

Some supporters address TOB operations optimistically and make good points. Community Power (“CP”) supports TOB as creating a local, equitable, affordable, and resilient

¹ SRA Comments at 12, 16.

² Peer Learning Energy Efficiency Cohort; Energy Access Commenters; Community Power; Resilient Cities and Communities; Climate + Energy Project; Community Engagement Energy Efficiency Project; Renew Missouri; City of St. Louis Park (and SRA member); Community Engagement Energy Efficient Project; Clean Energy Organizations; in addition to the City of Minneapolis.

³ RM Comments.

⁴ *Id.* at 1.

⁵ *Id.*

energy option. CP makes the policy arguments for TOB citing the disparity in loan availability even at zero percent interest and the self-funded benefit of a TOB type of program, i.e., not funded by the ratepayers as low-income and general conservation improvement programs (“CIP”) do.⁶ CP endorses the use of utility funding because of its substantial access to capital “with rates that are unparallel to what could be achieved unsubsidized – by individuals, and dramatically lowers the time burden of navigating.”⁷ CP defends the Petition’s long pay-back period with no pre-pay option by stating that the improvements save energy and cost every year thus mitigating the accrual of interest over the 12-year period.⁸ CP defends the renter aspect of the program that renters “receive – 20% reduction in their cost of living directly along with the comfort.”⁹ That financial benefit, however, is not assured to any renter under TOB. CP also argues that the fact of colder winters together with poor insulation remaining in much of Minnesota’s housing stock is a greater opportunity for energy savings with TOB-sanctioned improvements, not less.¹⁰ It points out that less than 3% of our building stock is being upgraded each year and insulating and other upgrades affecting energy use.¹¹

Yet even the support of CP and the Clean Energy Organizations is conditioned on changes to TOB that require CPE modifications it has refused to make throughout this two-docket process. CP requests the removal of the additional 4.92% recovery of CPE’s unrecovered rate of return through TOB,¹² removal of the \$100 upfront cost to participants, use of the \$15 million three-year budget as a limitation on annual participation rather than a limit not tied to participation, earlier

⁶ CP Comments at 7.

⁷ *Id.* at 9.

⁸ *Id.* at 11.

⁹ *Id.* at 12.

¹⁰ *Id.*

¹¹ *Id.*

¹² *Id.*

pilot evaluation, additional consumer protections to the tariff, a more user-friendly sign-up process, and assurance of no double-counting of CIP incentives where CIP dollars are used for TOB projects.¹³

Similarly, Community Engagement Energy Efficient Project (“CEEP”) requests removal of CPE’s rate of return requirement from all ratepayers from ratepayer recovery, no yearly cap on the program, better development of the program materials, program operator partnering with income-eligible match funding resources and removal of upfront cost for audit.¹⁴

The Clean Energy Organizations of Fresh Energy, Sierra Club, Minnesota Center for Environmental Advocacy and Community Stabilization (“CEOs”) “generally support” TOB but “subject to” very extensive modifications that significantly change – and improve – TOB.¹⁵

B. The Parties Opposing the Petition Are Strong Advocates for Low-Income Customers and Have Closely Analyzed Important Legal and Operational Flaws in this TOB

The SRA appreciates and shares the important goals of TOB, as emphasized by the supporting parties. Their positions, however, argue for TOB in concept and are based on claimed success of similar programs in other states, not on the specific merits/flaws of the Petition. In contrast, the parties below, have analyzed TOB on its costs, legal risks, and operational readiness. They continue to oppose this TOB plan. The SRA shares the concerns summarized below.

C. Department of Commerce and Office of the Attorney General

Department of Commerce (“DOC”) maintains its position held in GR-19-524 that the Legislature must approve the TOB pilot program as presented, raising a likely legal challenge.^{16 17}

¹³ CP Comments at 13-14.

¹⁴ CEEP Comments at 6.

¹⁵ CEO Comments at 46-47, items 1-13.

¹⁶ DOC Comments at 6.

¹⁷ *Id.*

DOC also points out that overlaps still exist between CIP and TOB.¹⁸ DOC remains concerned that the expanded CIP funding and TOB's stated target of low-income rental properties in Minneapolis Green Zones and areas of concentrated poverty will interfere with participation in no-cost CIP programs, and that moderate-income customers may be eligible for the Company's existing EZPay Program as a better alternative.¹⁹ DOC has further concerns that ratepayers are asked to pay the Company's rate of return subsidizing landlords who should contribute more toward the cost of upgrades as TOB participants.²⁰ DOC also notes CPE's recent filing to expand into new programs for CIP low-income recipients, better serving the targeted customers than TOB.²¹ Like nearly all other commenters, including the SRA, DOC opposes the use of authorized rate of return by CPE and its financing costs of TOB.

DOC also points out that, subsequent Owners or Renters not able to be released if the 80/20 rule does not work for them, may be forced to pay higher costs than the 80/20 rule would allow for the initial Participant.²² DOC opposes disconnection rights sought by CPE as contrary to Minnesota Rules, part 7820.1300B and failure of the pilot subject matter to qualify as a utility service.²³

The Office of the Attorney General – Residential Utilities Division (“OAG”) also opposes approval of TOB on multiple grounds noting that, because the upgrades are “conceptualized” as a utility service, there would be no ability for the participant to pay off the financing early or otherwise pre-pay unbilled charges to reduce interest or facilitate property transfer.²⁴ TOB requires

¹⁸ DOC Comments at 6-7.

¹⁹ *Id.*

²⁰ *Id.* at 8.

²¹ *Id.* at 8-9.

²² *Id.* at 12.

²³ *Id.*

²⁴ OAG Comments at 8.

ratepayers to fund pilot startup and delivery costs, and the remaining portion of CPE's full authorized capital cost that exceeds 2.5%, or is not otherwise recovered up to its total rate of return of 7.42% – an overall return that will change during the 15-year recovery period.²⁵ OAG continues to reject CPE's position that the TOB upgrades are a utility service as defined by Minnesota law, signaling one of numerous legal challenges that TOB could face.²⁶ CPE's request for a return would add greatly to the cost of CPE's CIP and those of other utilities if this request is applied more broadly.²⁷ OAG opposes disconnection of participants for failing to pay pilot charges and including low-income owners and renters in the TOB pilot because there are other low- or no-cost services available to eligible low-income customers.²⁸ OAG also objects to CPE earning a full return on this pilot because TOB is not sufficiently risky to warrant a greater than 7% return.²⁹ OAG seeks additional conditions to protect tenants were the pilot to go forward, but these are added to myriad of changes DOC, OAG and even supporting parties require for pilot implementation.^{30 31 32 33}

The substantive opposition to TOB does not stop with the state agencies.

D. Center for Energy and Environment

The SRA finds the Center for Energy and Environment's ("CEE") opposition to TOB, and others below, significant because CEE is an organization dedicated to the same principles and policies espoused by TOB supporters. Importantly, CEE also analyzed the cost of TOB to

²⁵ OAG Comments at 9.

²⁶ *Id.*

²⁷ *Id.* at 11-12.

²⁸ *Id.* at 13-14.

²⁹ *Id.* at 17-18.

³⁰ *Id.* at 15.

³¹ *Id.*

³² *Id.* at 16.

³³ *Id.*

moderate-income residents regarding the goals TOB would attempt to achieve, a demographic of high interest to the SRA.

CEE aligns with DOC and OAG (and ECC, below) in the position that the best way to fund and improve existing energy efficiency is through CIP.³⁴ It has “deep concerns about the program proposed in the TOB petition.”³⁵ CEE is critical of TOB cost in attempting to meet energy-efficiency needs of not only low-income homeowners and renters, but also those of moderate income.³⁶ Importantly, CEE demonstrates a poor TOB cost effectiveness rate when compared to other CPE energy-efficiency programs.³⁷ CEE concluded that the TOB program is likely to be “*far more expensive in implementing the same measures through market-rate CIP programs and seeking out alternative financing operations.*”³⁸ In Table 6, CEE demonstrated costs to TOB-program participants.³⁹ They are high and thus problematic for low- and moderate-income customers.

CEE also finds that the TOB program for renters “shifts the costs of building improvements that would and should be paid by the property owner to the renter.”⁴⁰ It provides for tenants (and CPE ratepayers) to pay for building upgrades for which a landlord should be responsible.⁴¹ Moreover, the successor renter turnover – in likely ample amount over a 12-year period – risks changed energy usage negating the modeled energy savings to the building.⁴² CEE also highlights the manner in which TOB costs are additive to CIP ratepayer costs.⁴³ This identified TOB cost

³⁴ CEE Comments at 3.

³⁵ *Id.*

³⁶ *Id.* at 3-4.

³⁷ *Id.* at 6-20.

³⁸ *Id.* at 11 (emphasis added).

³⁹ *Id.* at 13.

⁴⁰ *Id.* at 14.

⁴¹ *Id.*

⁴² *Id.* at 14-15.

⁴³ *Id.* at 18.

issue adds to the SRA's opposition to the TOB plan for potential imbalance in budget allocation across CPE service territory. As identified in the SRA's initial comments, the Petition thus far contains no articulated plan for budget allocation throughout CPE-served suburbs, exurbs, and rural areas area ratepayers.⁴⁴

E. Citizens Utility Board of Minnesota

Citizens Utility Board of Minnesota ("CUB") also details and describes the same TOB problems shared by other commenters: plan financing and total costs, upfront Participant costs, startup delivery and administration costs, assurance of savings and ratepayers cost, the Company's rate of return full recovery request, lack of prepayment, dispute resolution process and disconnection rights sought by CPE.⁴⁵ Again, CUB opposition to TOB is persuasive given its strong record of advocacy for the customers TOB is intended to assist.

F. Energy Cents Coalition and Legal Services Advocacy Project Comments, and Joint Commenters Reply

Energy Cents Coalition ("ECC") and Legal Services Advocacy Project ("LSAP") represent ratepayer constituencies that TOB seeks to benefit, and ECC has high expertise in utility assistance programs through CIP for low-income customers. Yet these commenters adamantly oppose TOB. ECC lists three now familiar reasons: (1) TOB will introduce net harmful outcomes for low-income households; (2) TOB requires excessive upfront costs to participants, e.g., \$100 onsite assessment and \$475 program services fee; and (3) TOB seeks disconnection rights from service for failure to pay TOB charges without a legal basis for declaring it an essential utility service.⁴⁶

LSAP comments provide its list of potential or likely legal challenges facing TOB, a theme LSAP began in GR-19-524. CPE has not addressed those issues to LSAP's satisfaction, setting up

⁴⁴ See SRA Comments at 14-18.

⁴⁵ CUB Comments at 2 et. seq.

⁴⁶ ECC Comments at 1.

the specter of unwanted legal disputes prior to or during a TOB pilot. They include: transfer of TOB debt; TOB violation of CPE's duty to serve under common law; TOB as an essential utility "service;" utility meter as collateral to secure a debt obligation; use of a tariff as a right to break a lease; impairment of contract obligations; landlord-tenant law changes; and Commission authority to cancel a property purchase agreement by tariff approval.⁴⁷ Each presents the potential to derail a component of TOB at any time during the three-year pilot, or well-after it as homeowners and renters seek to transfer TOB payment obligations to successors.

ECC, LSAP and CEE joined to file a "Joint Commenters" reply on March 4, 2022, that summarizes the many unresolved TOB issues at this late stage of the docket.⁴⁸ This docket was granted by the Commission to address those very obstacles, allowing the TOB rejected in GR-19-524 to develop into a workable pilot. No legislative changes were obtained or apparently sought, despite fact that the Cadmus Study, often cited by the TOB proponents, urged legislative resolution to legal barriers raised by the TOB plan.⁴⁹ Further, CPE has steadfastly refused to back away from a full rate of return on its TOB funding, a rate that promises to go up, not down during the pilot period and 15-year recovery period.

It is telling that so many vigorous advocates for the very groups TOB seeks to assist strongly oppose TOB in its current form. The SRA is compelled to join those parties' opposing approval of TOB as not in the public interest in this form. Minor tweaks to TOB are not sufficient. Major surgery to TOB is unlikely to satisfy all parties and places the Commission in the position of materially altering the Petition to the likely rejection of CPE. Full rate of return on capital,

⁴⁷ LSAP Comments at 1-14.

⁴⁸ Joint Commenters Reply at 1-2.

⁴⁹ *Id.* at 7.

recovery of all pilot costs, disconnections and essential utility service treatment of the improvements have been apparent non-negotiables to CPE since GR-19-524.

Like TOB's supporters and most parties opposing it, however, the SRA supports a CPE plan expanding access to dwelling energy improvement capital for low and moderate income. A significant appeal to the SRA of TOB has been more access to moderate-income customers not eligible for low-income program assistance. Accordingly, the SRA joins in the Joint Commenters recommendation that by December 31, 2022, CPE submit new CIP offerings to better serve low- and moderate-income homeowners and renters.⁵⁰

G. SRA's TOB Education and Funding Allocation Concerns

It remains unclear how TOB plan education and available budgeted funds would be allocated equitably throughout CPE service territory. The SRA has asked CPE to respond to its concerns in its reply to be filed concurrently with this reply. Though the SRA will read CPE's reply with interest, a balanced roll-out of TOB throughout its service territory and fair allocation of TOB funds is secondary to the question of plan readiness. The SRA does not believe that the Petition has developed a pilot ready for implementation free of material potential roadblocks that may harm participants and be inequitable to ratepayers.

CONCLUSIONS AND RECOMMENDATIONS

The SRA supports a finding by the Commission that the TOB Petition is not in the public interest and should not be adopted. The SRA believes that for the Petition to be in the public interest, substantial changes are necessary which are now too late to make with any kind of consensus between CPE and the parties. Therefore, the SRA supports the Joint Commenters recommendation in their reply at 3) that CPE submit by December 31, 2022, one or more CIP

⁵⁰ Joint Commenters Reply at 9, fn. 3.

offerings to better serve low- and moderate-income homeowners and renters in energy savings dwelling improvements to be installed in areas throughout its service territory.

Respectfully submitted,

Dated: May 13, 2022

KENNEDY & GRAVEN, CHARTERED

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May 13, 2022

VIA E-FILING

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**Re: *In the Matter of the Petition by CenterPoint Energy and the City of Minneapolis to
Introduce a Tariffed on Bill Pilot Program***
MPUC DOCKET NO. G-008/M-21-377

Dear Mr. Seuffert:

On behalf of the Suburban Rate Authority, attached for filing in the above-referenced docket please find the Reply Comments of the Suburban Rate Authority. This document has been served on the parties on the attached Service List. A Certificate of Service is also attached.

Very truly yours,

KENNEDY & GRAVEN, CHARTERED

/s/ James M. Strommen

James M. Strommen

Attachment

cc: Service List

**Re: *In the Matter of the Petition by CenterPoint Energy and the City of Minneapolis to
Introduce a Tariffed on Bill Pilot Program***
MPUC DOCKET NO. G-008/M-21-377

CERTIFICATE OF SERVICE

I, Lisa Larson, hereby certify that I have this day served copies of the following document:

Reply Comments of the Suburban Rate Authority

on:

the list of persons on the attached Service List

by electronic filing and serving in the eDockets system, and/or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at Minneapolis, Minnesota.

Dated this 13th day of May, 2022.

/s/ Lisa Larson
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