

**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 Xcel Energy's Tariff Revisions
Updating Community Solar Garden Tariff
Providing Additional Protection in
Subscription Eligibility

Docket No. E002/M-21-695

In the Matter of the Petition of Northern
States Power Company, D/B/A Xcel Energy, for
Approval of its Proposed Community Solar
Garden Program

Docket No. E002/M-13-867

Reply Comments of the Citizens Utility Board of Minnesota

The Citizens Utility Board of Minnesota ("CUB", "we", "us", "our") submits these Reply Comments in response to the Commission's November 22, 2022 Notice of Comment Period¹ (the "Commission Notice") regarding customer protections for tenants in premises that are subject to Community Solar Garden ("CSG") subscriptions. For the reasons discussed below, we continue to recommend that the Commission take the following actions:

1. Approve tariff modifications that grant customers reasonable choice to opt-in and opt-out of the Building Subscription Model for any reason at any time;
2. Eliminate the minimum monthly usage level a customer must exceed to qualify for Xcel's PowerOn program; and
3. Reopen Order Point 2b of the Commission's June 24, 2022 Order to reconsider the requirement that Xcel modify its affordability tariffs in an attempt to accommodate the Building Subscription Model.

¹ *In the Matter Xcel Energy's Tariff Revisions Updating Community Solar Garden Tariff Providing Additional Customer Protections in Subscription Eligibility*, Notice of Comment Period, Docket No. E002/M-21-695 (Nov. 22, 2022) ("Commission Notice").

ANALYSIS

1. The Commission is not being asked to decide whether Xcel should be required to allow low-income tenants to participate both in affordability programs and community solar.

Some parties frame this docket as pitting eligibility for affordability programs against participation in community solar. For example, the Joint Solar Associations ("JSA") open their initial comments noting that "low-income ratepayers should not have to choose between" the Low-Income Home Energy Assistance Program ("LIHEAP") (which qualifies them for Xcel's affordability programs) and access to renewable energy programs like Xcel's community solar garden ("CSG") program.² TBR notes that Xcel's low-income customers "should not be excluded from CSG participation solely because they need energy assistance from Xcel's affordability programs"³ and that "low-income utility customers should not be needlessly disqualified" from energy assistance programs when subscribing to a CSG.⁴ We respectfully disagree with how JSA and TBR have framed the issues before the Commission in this docket.

Low-income tenants are not excluded from participating in community solar because they "need energy assistance," and low-income tenants are not "needlessly disqualified" from LIHEAP or Xcel's affordability programs due to their participation in community solar. From our perspective, no party to this proceeding is suggesting that low-income customers should have to choose between these offerings. Further, Xcel's proposed tariff modifications do not restrict tenants' ability to *choose* to participate in community solar; rather, the proposed tariff modifications restrict landlords' ability to compel that participation. There is an important difference.

The problems the parties have attempted to address in this docket relate to the administrative complexities arising under the Building Subscription Model—the use of which makes it very difficult for some low-income tenants to participate in both Xcel's affordability programs and in a *specific* community solar garden the tenants' landlord selects and subscribes to on behalf of its tenants.⁵ Therefore, we see the issue before the Commission not as "should Xcel be required to

² Northern States Power Company, d/b/a Xcel Energy, *In the Matter of Xcel Energy's Tariff Revisions Updating Community Solar Garden Tariff Providing Additional Customer Protections in Subscription Eligibility*, Initial Comments of the Minnesota Solar Energy Industries Association (MnSEIA) and Coalition for Community Solar Access (CCSA), Docket No. E002/M-21-695 at 2 (Dec. 21, 2022) ("JSA Initial Comments").

³ Northern States Power Company, d/b/a Xcel Energy, *In the Matter of Xcel Energy's Tariff Revisions Updating Community Solar Garden Tariff Providing Additional Customer Protections in Subscription Eligibility*, Initial Comments of TBR, Docket No. E002/M-21-695 at 3 (Dec. 21, 2022) ("TBR Initial Comments").

⁴ TBR Initial Comments at 10, citing Commission Order denying petition at 5.

⁵ As in our initial comments, we define Building Subscription Model as follows: Under a Building Subscription Model, the landlord becomes the customer of record for the tenants' meters; that is, the landlord or its agent acts as a [re-biller],

allow low-income tenants to both participate in its affordability programs and subscribe to a CSG" but rather as this narrower, two-part question: (1) should Xcel be required to accommodate the Building Subscription Model to enable the owner of a separately-metered building to take over tenants' Xcel accounts in order to subscribe those tenants *en masse* to a CSG; and (2) if the answer to the first question is "yes," *how* must Xcel accommodate the Building Subscription Model to ensure tenants participating in that model are not excluded from Xcel's affordability programs?

2. Interpreting the legal definition of "customer" does not, itself, address the problems that the Joint Petitioners have brought before the Commission.

When discussing whether Xcel should be required to accommodate the Building Subscription Model, some parties have focused their comments on the legal definition of "customer." For example, JSA noted in its initial comments that, "at the [May 5, 2022] hearing, it became obvious that the issue in this matter centered around Xcel's narrow definition of customer."⁶ JSA then devoted a large portion of its initial comments to arguing that Xcel misinterprets this definition. We agree that the definition of customer has come up in parties' filings and that it was discussed at the May 5, 2022 hearing. However, as noted in our initial comments, defining "customer" broadly to include multi-metered building tenants whose Xcel accounts are held in the name of a third party re-biller does not, itself, solve the problems that this docket is attempting to address.

The bigger problem is that neither a landlord, nor a third-party re-biller, is a "utility" subject to regulation under Minn. Stat. 216B. Under the Building Subscription Model, Xcel—and Xcel's customers—are dependent on the voluntary cooperation of landlords and/or third-party re-billers to help fulfill Xcel's consumer protection obligations as a regulated utility. Defining "customer" broadly to include multi-metered building tenants whose Xcel accounts are held in the name of a landlord or re-biller merely puts more pressure on Xcel to figure out how to incorporate that landlord's or re-biller's voluntary cooperation into its service model. As this docket has shown, Xcel's reliance on that cooperation becomes quickly and increasingly complicated as more landlords and re-billers begin utilizing the Building Subscription Model—particularly if those entities are unfamiliar with the logistics of how Xcel's affordability programs are managed. Even if landlords and re-billers

receiving all the tenants' CSG charges and credits as well as Xcel electricity bills for the entire building. The landlord then provides a single bill to each tenant which often combines rent, CSG costs and credits, and any remaining electricity service charges.

⁶ JSA Initial Comments at 3.

participating in this docket are willing and able to provide needed cooperation, they cannot speak for or bind other parties that have not participated. Therefore, if the Building Subscription Model is becoming more prevalent in Minnesota (as it appears to be), we believe it is in the public interest to identify parameters surrounding its use to help ensure customers participating in that model retain key protections. Xcel has attempted to provide these parameters with its proposed tariff modifications.

3. Xcel's proposed tariff modifications are reasonable, necessary, and in the public interest.

In its November 11, 2022 compliance filing, Xcel proposed tariff modifications to tariff sheets 9-74, 9-76, and 9-99.1 through 9-99.3. In Xcel's view, these proposed modifications "ensure customer protections and maintain all energy assistance provisions offered by a regulated utility" when the Building Subscription Model is utilized.⁷ As the Department of Commerce ("the Department") noted:

The Department believes the tariff pages stating how CSG offerings work in rental units will offer uniformity, which in turn will offer clarity and transparency. Tariffs are public and are reviewed by numerous stakeholders before approved; they are also posted on utility websites.⁸

We agree. Indeed, *with* Xcel's proposed tariff modifications, the Building Subscription Model can continue, subject to certain clear, transparent, and uniform parameters. *Without* Xcel's proposed tariff modifications, the confusion that arises under the Building Subscription Model is likely to recur; Xcel and/or consumer advocates are likely to hear from additional consumers frustrated over losing their access to affordability programs; and Xcel and/or consumer advocates will likely need to reexplain the complex issues that have arisen in this docket to new landlords and re-billers, hoping those parties will also be willing and capable of voluntarily cooperating to help ensure Xcel's obligations to its customers are met. This latter option is not sustainable and not in the public

⁷ Northern States Power Company, d/b/a Xcel Energy, *In the Matter of Xcel Energy's Tariff Revisions Updating Community Solar Garden Tariff Providing Additional Customer Protections in Subscription Eligibility*, Xcel Compliance Filing, Docket No. E002/M-21-695 (Nov. 11, 2022) ("Xcel Compliance Filing").

⁸ Northern States Power Company, d/b/a Xcel Energy, *In the Matter of Xcel Energy's Tariff Revisions Updating Community Solar Garden Tariff Providing Additional Customer Protections in Subscription Eligibility*, Initial Comments of Department of Commerce, Docket No. E002/M-21-695 at 3 ("DOC initial Comments").

interest. With this in mind, CUB joins the OAG,⁹ Department,¹⁰ Energy CENTS Coalition,¹¹ and Legal Aid organizations¹² in supporting the tariff modifications Xcel has proposed.

While we are not necessarily opposed to all suggested edits others have offered to Xcel's proposed tariff modifications, we generally find them to be unnecessary. We do not independently recommend any additional edits to Xcel's proposed tariff modifications.

4. The Commission should reopen and reconsider Order Point 2b.

As noted above, we see this docket as calling on the Commission to address this, two-part question: (1) should Xcel be required to accommodate the Building Subscription Model to enable the owner of a separately-metered building to take over tenants' Xcel accounts in order to subscribe those tenants *en masse* to a CSG; and (2) if the answer to the first question is "yes," *how* must Xcel accommodate the Building Subscription Model to ensure tenants participating in that model are not excluded from Xcel's affordability programs? We continue to see the best way of addressing both questions as simply requiring those utilizing the Building Subscription Model to allow tenants to opt-in and opt-out of that model at any time, for any reason, without penalty. We agree with Xcel that there is not a better "practical, cost and time-efficient modification [to its Affordability Program tariffs] that can be made that will allow low-income renters subject to rebilling access to [Xcel's] Affordability Programs."¹³ For this reason, we continue to recommend that the Commission approve tariff modifications that grant customers reasonable choice to opt-in and opt-out of the Building Subscription Model and reopen and reconsider Order Point 2b from its June 24, 2022 Order.

We also continue to recommend that the Commission eliminate the minimum monthly usage level a customer must exceed to qualify for Xcel's PowerOn program. We see nothing in other parties' initial comments that is inconsistent with this recommendation.

⁹ See generally, *Northern States Power Company, d/b/a Xcel Energy, In the Matter of Xcel Energy's Tariff Revisions Updating Community Solar Garden Tariff Providing Additional Customer Protections in Subscription Eligibility*, Initial Comments of the Office of the Attorney General, Docket No. E002/M-21-695 (Dec. 20, 2022) ("OAG Initial Comments").

¹⁰ DOC Initial Comments at 3.

¹¹ See generally, *Northern States Power Company, d/b/a Xcel Energy, In the Matter of Xcel Energy's Tariff Revisions Updating Community Solar Garden Tariff Providing Additional Customer Protections in Subscription Eligibility*, Initial Comments of Energy CENTS Coalition, Docket No. E002/M-21-695 (Dec. 20, 2022).

¹² See generally, *Northern States Power Company, d/b/a Xcel Energy, In the Matter of Xcel Energy's Tariff Revisions Updating Community Solar Garden Tariff Providing Additional Customer Protections in Subscription Eligibility*, Initial Comments of MMLA and LSAP, Docket No. E002/M-21-695 (Dec. 20, 2022).

¹³ Xcel Compliance Filing at 14.

CONCLUSION

In summary, we continue to recommend that the Commission take the following actions:

1. Approve tariff modifications that grant customers reasonable choice to opt-in and opt-out of the Building Subscription Model for any reason at any time;
2. Eliminate the minimum monthly usage level a customer must exceed to qualify for Xcel's PowerOn program; and
3. Reopen Order Point 2b of the Commission Order to reconsider that requirement.

Thank you for considering these comments.

Sincerely,

January 17, 2023

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**STATE OF MINNESOTA
BEFORE THE PUBLIC UTILITIES COMMISSION**

In the Matter of Xcel Energy's Tariff Revisions
Updating Community Solar Garden Tariff
Providing Additional Customer Protections in
Subscription Eligibility

MPUC Docket No. E002/M-21-695

In the Matter of the Petition of Northern States
Power Company d/b/a Xcel Energy for
Approval of its Proposed Community Solar
Garden Program

MPUC Docket No. E002/M-13-867

CERTIFICATE OF SERVICE

I, Brian Edstrom, hereby certify that I have served a true and correct copy of the following documents to all persons at the addresses indicated on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

1. Reply Comments of the Citizens Utility Board of Minnesota

Dated this 18th day of January, 2023.

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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_21-695_21-695

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_21-695_21-695
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