

**From:** [Brown, Jonathan D \(COMM\)](#)  
**To:** [McShane, Sally Anne \(PUC\)](#)  
**Cc:** [Duran, Derek \(PUC\)](#); [Rebholz, Michelle M \(COMM\)](#)  
**Subject:** RE: Questions about LIHEAP for re-billed tenants  
**Date:** Tuesday, April 11, 2023 11:13:49 AM  
**Attachments:** [image002.png](#)

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Hi Sally Anne,

From our perspective, Xcel's tariff changes do not impact how the Energy Assistance Program distributes benefits. My responses to your questions are in red below.

1. How many LIHEAP participants are tenants that are re-billed by a third-party? – **Unknown.** We only know the ones listed on a household's application. Not all are options in eHEAT and sometimes it is reported/entered as heat and/or electric in rent. The current 2022-2023 program year numbers, for the ones we know, are in the table below. Water Systems Inc and JIT are the only cooperative 3<sup>rd</sup> party vendors on the list, which means they have eHEAT access and receive payments. All others are considered uncooperative, and households with those vendors may receive direct payments.

<b>Vendor</b>	<b>All Apps</b>	<b>Approved Apps</b>
Energy Billing Systems, Inc.	0	0
Multifamily Utility Company	31	15
UMS - Utility Management Solutions	77	35
YES Energy Management	32	14
ConService	29	8
RealPage Utility Management - AUM	115	55
Water Systems Inc	4	3
JIT	1132	628
Total	1420	758

2. Do you know how many re-billed tenants are eligible for LIHEAP? – **Being rebilled does not impact eligibility. If a household has an energy burden, they can be eligible for EAP if they meet the income and dwelling requirements.**
3. Do third-party billers have to be an eHeat vendor for its re-billed tenants to receive LIHEAP grants? - **No**
4. Is JIT the only re-biller that is an eHeat vendor? - **No**
5. Have any other re-billers asked about becoming an eHeat vendor? – **We are not aware of others besides Water Systems Inc. We received some inquiries about adding 3<sup>rd</sup> party billers for water assistance, but 3<sup>rd</sup> party billers cannot receive water payments.**
6. What information a third-party have access to in eHeat? – **Only registered and cooperative vendors, like JIT, have access to eHEAT. They can see information about any household that listed them on their application. This includes name on account, address, phone number, account number, eligibility status, application status, benefit amount (if applicable), if they have subsidized heating, if heat is included in rent, primary fuel source, and their EAP Service Provider. They can also see payment details if they received some of the household's benefit.**
7. Can you please provide the step-by-step process for service providers/the EAP division to provide LIHEAP grants to re-billed tenants? – **EAP Service Providers approve payments to vendors. Commerce staff does not process applications or direct payments. The process for directing payments to 3<sup>rd</sup> party billers is the same as any other vendor unless the vendor is considered uncooperative. If the vendor is uncooperative, EAP sends a direct**

payment to the household. Direct payments can happen for other reasons; they are not exclusive to 3<sup>rd</sup> party vendors.

- a. Households apply for EAP and list their vendor(s) on their application
  - b. Service Provider processes the application and determines eligibility and benefit
  - c. If eligible, the household's benefit is generated as a certifiable payment to the vendor(s) listed on the household's application in the amounts the household indicated
  - d. The Service Provider reviews Certifiable payments, and makes them Payable in eHEAT
  - e. Payable payments are sent to Minnesota Management and Budget (MMB) to be paid the next day as either a check or EFT
  - f. Vendors receive payment and apply funds to the household's account.
8. Do you know of any federal laws regarding LIHEAP that apply to re-billed tenants or third-party re-billers? - No

Let me know if you have any questions.

Thanks,

Jon Brown

Energy Vendor Manager

651-539-1869

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Minnesota Department of Commerce

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**From:** McShane, Sally Anne (PUC) <sally.anne.mcshane@state.mn.us>

**Sent:** Tuesday, April 4, 2023 9:07 AM

**To:** Brown, Jonathan D (COMM) <jonathan.d.brown@state.mn.us>

**Cc:** Duran, Derek (PUC) <derek.duran@state.mn.us>

**Subject:** Questions about LIHEAP for re-billed tenants

Good morning Jon,

I hope you are doing well.

I have a few questions for you regarding the LIHEAP program as it relates to tenants that are re-billed by a third party, i.e. JIT:

1. How many LIHEAP participants are tenants that are re-billed by a third-party?
2. Do you know how many re-billed tenants are eligible for LIHEAP?
3. Do third-party billers have to be an eHeat vendor for its re-billed tenants to receive LIHEAP grants?
4. Is JIT the only re-biller that is an eHeat vendor?
5. Have any other re-billers asked about becoming an eHeat vendor?
6. What information a third-party have access to in eHeat?
7. Can you please provide the step-by-step process for service providers/the EAP division to provide LIHEAP grants to re-billed tenants?
8. Do you know of any federal laws regarding LIHEAP that apply to re-billed tenants or third-party re-billers?

*Note that this email chain will be eFiled in Docket No. 21-695 – Xcel’s CSG and Affordability Programs for Tenants. The Department is a party to this docket, albeit not the Energy Assistance Program division.*

Let me know if you have any questions.

Thank you very much,  
Sally Anne

**Sally Anne McShane**

Rates Analyst | Economic Analysis (Energy and Telecom)  
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