

December 21, 2022
Via electronic filing

William Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

**State of Minnesota
Public Utilities Commission**

Katie Sieben Chair
Valerie Means Commissioner
Matt Schuerger Commissioner
Joseph K. Sullivan Commissioner
John Tuma Commissioner

In the Matter of the Xcel Energy's Tariff Revisions Updating Community Solar Garden Tariff Providing Additional Customer Protections in subscription Eligibility (Docket No. E-002/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. E-002/M-13-867)

Dear Mr. William Seuffert,

Sagiliti participated in all of the Xcel Energy stakeholder meetings and offer the following comments to Xcel Energy's Compliance Filing, largely addressing Order Point 2B and some statements made in the filing:

2. Regarding its PowerOn Program, Medical Affordability Program, Gas Affordability Program, and Low-Income Discount Program, Xcel shall do the following:

A. Before Xcel transfers a utility account from a tenant to the landlord as part of a Community Solar Program, Xcel shall take reasonable steps with the landlord to help qualified tenants continue receiving the benefits of these low-income affordability programs.

B. Xcel shall propose a modification to its tariffs for these programs to allow low-income renters who are subject to third-party billing to access these programs.

While we can support most of the proposed compliance filing, and appreciate the group's work through a number of difficult matters, we do believe, however, that the discussions too narrowly focused on:

- The PowerOn program only, with no dialogue around access to the less complex Low-Income Discount Program, and
- Issues related to an inability to provide access to these programs in Re-billing situations, with no discussion around access to the programs for traditional Third-Party billing scenarios where there is a master meter and private submeters.

Since the Stakeholder group was so focused on CSG re-billing scenarios, there were only a couple of references in the meeting minutes where participants asked about other scenarios for providing access to these programs for other third-party billing situations. While there appears to be support for the compliance filing as proposed, we would ask that Xcel Energy and the parties continue to look for ways to allow renters access to, specifically, the Low-Income Discount program for both Re-billing situations (whether a CSG subscriber or not) and third-party billing for submetered properties. The Low-Income Senior Discount program was not discussed during the various Stakeholder group sessions, as demonstrated by the meeting minutes, and should be visited.

As such, Sagiliti opposes Xcel's request to reopen Order Point 2.B and remove the requirement as we do not believe a satisfactory review of all programs and scenarios were explored.

CLARIFICATION

In Xcel Energy's filing, specifically in Section V. Outstanding Concerns; Subsection A. Customer Transparency & Oversight, our company was asked to explain how Sagiliti determined the 2021 crisis funding to the group and went on to make references of a lack of understanding of programs. Sagiliti reported precisely what was sent to us and we were not the ones deciding whether the funds we received to apply to residents' accounts was Primary of Crisis.

Here is an example of the CSV file we receive from the Agency with payment details that gets loaded into our database. We receive a file multiple times a week along with a corresponding ACH payment to apply to the resident accounts. The only edits made to this file was redacting personal information.

Note column F, where we are informed of the funding "Type."

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U
1	PAYMENT_CUST_ACCT_NBR	APP_NAME	SP_ID	TYPE	AMT	PAYMENT_HH_NBR	PAYMENT_ST_DT	WRNT_EFT	SCHEDULED_CVNDR_NM	SP_NM	SCHEDULE_FUND_CTY	DIRECT_P	POSTBN_ID	DIST_AMT	DIST_ORG_DT	CUST_ACCT_NM				
2	12074886 REDACTED	REDACTED	13	CRISIS	584 Paid	REDACTED	6/29/2022	7477979	JT Services	Tri-County Action Program, Inc.	No	Program	No	5444538	584	6/23/2022 REDACTED				
3	12076748 REDACTED	REDACTED	65	PRIMARY HEAT	417 Paid	REDACTED	6/29/2022	7477979	6/27/2022 JT Services	Community Action Partnership of Hennepin County	No	Program	No	5446400	417	6/27/2022 REDACTED				
4	12076709 REDACTED	REDACTED	16	PRIMARY HEAT	470 Paid	REDACTED	6/29/2022	7477979	6/27/2022 JT Services	Community Action-Ramsey and Washington Counties	No	Program	No	5446360	470	6/27/2022 REDACTED				
5	12077748 REDACTED	REDACTED	16	PRIMARY HEAT	439 Paid	REDACTED	6/29/2022	7477979	6/27/2022 JT Services	Community Action-Ramsey and Washington Counties	No	Program	No	5447400	439	6/27/2022 REDACTED				
6	12077749 REDACTED	REDACTED	16	CRISIS	2479 Paid	REDACTED	6/29/2022	7477979	JT Services	Community Action-Ramsey and Washington Counties	No	Program	No	5447401	2479	6/27/2022 REDACTED				
7	12076740 REDACTED	REDACTED	65	CRISIS	99 Paid	REDACTED	6/29/2022	7477979	JT Services	Community Action Partnership of Hennepin County	No	Program	No	5446392	99	6/27/2022 REDACTED				
8	12076290 REDACTED	REDACTED	65	PRIMARY HEAT	871 Paid	REDACTED	6/29/2022	7477979	6/26/2022 JT Services	Community Action Partnership of Hennepin County	No	Program	No	5445942	871	6/26/2022 REDACTED				
9	12077026 REDACTED	REDACTED	65	CRISIS	141 Paid	REDACTED	6/29/2022	7477979	JT Services	Community Action Partnership of Hennepin County	No	Program	No	5446678	141	6/27/2022 REDACTED				
10	12076382 REDACTED	REDACTED	65	PRIMARY HEAT	300 Paid	REDACTED	6/29/2022	7477979	JT Services	Community Action Partnership of Hennepin County	No	Program	No	5446034	300	6/26/2022 REDACTED				
11	12076878 REDACTED	REDACTED	65	CRISIS	187 Paid	REDACTED	6/29/2022	7477979	JT Services	Community Action Partnership of Hennepin County	No	Program	No	5446530	187	6/27/2022 REDACTED				
12	12076460 REDACTED	REDACTED	65	PRIMARY HEAT	401 Paid	REDACTED	6/29/2022	7477979	JT Services	Community Action Partnership of Hennepin County	No	Program	No	5446112	401	6/27/2022 REDACTED				
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Further, our portal login shows the Quantity and Volume by funding Type by Agency. When we reported to the Stakeholder group funding details, we pulled from this portal and made no independent decisions to categorize the Funding Type, as indicated in Xcel Energy's filing.

COMMERCE DEPARTMENT eHEAT Next Generation

Notification Center (0)

Home Vendor Services Payment Services Admin Services System Admin Services **Reports** HANNAH FROEHLING | hannah.f@sagiliti.com Logout

EAP Export

Reports > EAP

EAP

Report to Run: * Payment by Service Provid
 Current Program Year: 2022
 Go

5 Total					
SP_ID ^	SP_NM ^	PH_PAID_AMT ^	PH_NO_OF_HH_PAID ^	CRISIS_PAID_AMT ^	CRIS_NO_OF_HH_PAID ^
13	Tri-County Action Program, Inc.	\$9,070.50	16	\$9,614.00	14
15	Anoka County Community Action Program	\$67,886.49	157	\$42,077.00	111
16	Community Action-Ramsey and Washington Counties	\$146,082.67	325	\$102,100.00	204
18	Scott-Carver-Dakota CAP Agency	\$7,118.31	22	\$3,504.00	11
65	Community Action Partnership of Hennepin County	\$82,296.01	186	\$47,463.00	110
5 Total					

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Sagiliti is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

Mike Menzel
 J-I-T Services, Inc. (dba Sagiliti)
 952-562-8681
 mike.m@sagiliti.com