

Date 06/06/23

Docket: E002/M-21-222 & E002/M-19-33

Attn: Public Utilities Commissioners

Subj: Petition for Reconsideration/Amendment

I, Aaron Hanson, a person, Minnesota resident, Xcel Energy customer, and Windsource program subscriber am seeking a petition for reconsideration and amendment of the PUC order set forth in Dockets E002/M-21-222 & E002/M-19-33 on 05/18/2023 per MN Statute [7829.3000](#) due to the harm caused by the merger of Windsource into Renewable Connect MTM and the coming increases in cost to participate. Program costs will rise from 3.53¢/kWh (less overrecovery refunds) to 4.117¢/kWh.

Xcel bill excerpts (May, 2022 - November, 2022)

METER READING INFORMATION			
METER [REDACTED]	Read Dates: 05/12/22 - 06/13/22 (32 Days)		
DESCRIPTION	CURRENT READING	PREVIOUS READING	USAGE
Total Energy	19375 Actual	19014 Actual	361 kWh

Windsource Program	361 kWh	\$0.035300	\$12.74
Fuel Cost Charge	361 kWh	- \$0.036676	- \$13.24 CR

Net Windsource Charge \$-0.50

METER READING INFORMATION			
METER [REDACTED]	Read Dates: 06/13/22 - 07/13/22 (30 Days)		
DESCRIPTION	CURRENT READING	PREVIOUS READING	USAGE
Total Energy	19700 Actual	19375 Actual	325 kWh

Windsource Program	325 kWh	\$0.035300	\$11.47
Fuel Cost Charge	325 kWh	- \$0.038923	- \$12.65 CR

Net Windsource Charge \$-1.18

METER READING INFORMATION			
METER [REDACTED]	Read Dates: 07/13/22 - 08/11/22 (29 Days)		
DESCRIPTION	CURRENT READING	PREVIOUS READING	USAGE
Total Energy	20203 Actual	19700 Actual	503 kWh

Windsource Program	503 kWh	\$0.035300	\$17.76
Fuel Cost Charge	503 kWh	- \$0.037773	- \$19.00 CR

Net Windsource Charge \$-1.24

METER READING INFORMATION			
METER [REDACTED]	Read Dates: 08/11/22 - 09/12/22 (32 Days)		
DESCRIPTION	CURRENT READING	PREVIOUS READING	USAGE
Total Energy	20907 Actual	20203 Actual	704 kWh

Windsource Program	704 kWh	\$0.035300	\$24.85
Fuel Cost Charge	704 kWh	- \$0.039048	- \$27.49 CR

Net Windsource Charge \$-2.64

METER READING INFORMATION			
METER [REDACTED]	Read Dates: 09/12/22 - 10/11/22 (29 Days)		
DESCRIPTION	CURRENT READING	PREVIOUS READING	USAGE
Total Energy	21430 Actual	20907 Actual	523 kWh
Windsor Program	523 kWh	\$0.035300	\$18.46
Fuel Cost Charge	523 kWh	- \$0.040459	- \$21.16 CR
Net Windsor Charge \$-2.70			

METER READING INFORMATION			
METER [REDACTED]	Read Dates: 10/11/22 - 11/09/22 (29 Days)		
DESCRIPTION	CURRENT READING	PREVIOUS READING	USAGE
Total Energy	21737 Actual	21430 Actual	307 kWh
Windsor Program	307 kWh	\$0.035300	\$10.84
Fuel Cost Charge	307 kWh	- \$0.038632	- \$11.86 CR
Net Windsor Charge \$-1.02			

- Nov 9 to Dec 12 2022 Net Windsor Charge **\$-0.32**
- Dec 12 to Jan 16 2023 Net Windsor Charge **\$0.61**
- Jan 16 to Feb 14 2023 Net Windsor Charge **\$0.24**
- Feb 14 to Mar 16 2023 Net Windsor Charge **\$-1.59**
- Mar 16 to Apr 16 2023 Net Windsor Charge **\$-3.29**
- Apr 16 to May 15 2023 Net Windsor Charge **\$-6.16**

Since 2019 Windsor pricing has been providing cheaper electricity to its subscribers through annual refunds AND on-bill savings. The proposal as stated by Xcel Energy to **“price this product as a premium to the current fuel clause which will be returned to system fuel clause customers as part of the neutrality charge”** is a violation of MN Statute § 216B.169, by Xcel’s own pre-emptive admission, and a violation of what I agreed to pay for in my decision to subscribe to **Windsor**. I was fine paying a premium, knowing all my dollars would be used to build or procure more renewable energy resources which in turn drives down energy costs for all ratepayers through new renewable investments, but not to directly subsidize the cost of fossil fuels for other ratepayers. The PUC has failed to uphold the cost causation principles of the law.

By repeatedly emphasizing the “voluntary” nature of the program as justification for ignoring the renewable program law and turning one of the country’s most successful renewable energy programs into a fossil fuel subsidy, the PUC is also failing to ensure fair rates in accordance with statute 216B.07: “No public utility shall, as to rates or service, make or grant any unreasonable preference or advantage to any person or subject any person to any unreasonable prejudice or disadvantage.” It is simply not true that non-participating customers are not affected, they are being set up to receive an unreasonable subsidy to their fossil fuel costs, while renewable energy subscribers are saddled with unreasonable and what should be unallowable fees for their services. The Office of Attorney General expressed the same concern about future proposals.

The PUC itself expressed it’s own reluctance to discontinue Windsor in 2019, noting: **“It is likely that Xcel could solve many of Windsor’s problems were the Commission not approving Xcel’s request to make the R*C program permanent;** however, the Commission is largely approving

the request, and **there is no compelling reason to keep Windsource separate.**" This was based on Xcel's promise, "The merging of these programs will streamline our customer offers and result in price benefits for all customers as reflected in Attachment F. We are committed to establishing an **Ongoing Month-to-Month price that will be equal to, or less than, the current Windsource program tariff rate** and the current pilot month-to-month rate." This is now false and the PUC has made no effort to hold Xcel accountable for the pricing conditions outlined in the PUC's original price-contingent approval.

Further, with the passage of the SF4/HF7 (100% Clean Energy) Bill, MN statute 216B.1691 has been amended to require the commission to consider factors beyond cost and reliability when making decisions about renewable energy program compliance. Statewide air emission reduction benefits (6¢/kWh!) and the impact on Minnesotans' opportunity to participate fully in the clean energy economy were not considered during this docket. This change to the PUC's statutory considerations should warrant revisiting all the prior contingent decisions made in this docket, since they've excluded such considerations in the past.

Finally, as an individual resident, I invested unpaid personal time to provide a thoughtful assessment to assist the PUC in protecting the public, but I was ultimately left out of the conversation. The proceeding lasted only 9 minutes and despite following official procedures to participate, I was given no opportunity to speak, nor asked any questions. For almost two of the nine minutes, the commission stressed that they did not want the public to feel as if it was being ignored, after asking Xcel Energy to weigh in on my analysis and decision items. My experience reflects the [findings of the Office of the Legislative Auditor](#), "PUC's public participation processes are complex, varied, and have been implemented inconsistently. Further, PUC has not done a good job helping the public understand how to participate in those processes." In the end, the Public Utilities Commission offered no real deliberation or argumentation to explain its decision to the public before deciding to rubber stamp the decision items previously recommended by the company the PUC is tasked with regulating.

I ask you again to reconsider the discontinuation and merger of Windsource into an unreasonably higher-priced Renewable Energy Program. Allowing this decision to stand will deprive all Minnesotans the ability to reap the savings from renewables amid skyrocketing fossil fuel costs and slow down the deployment of the clean energy economy. I, and my collaborator Andrew Butts, laid out a reasonable decision item in our last letter (Revised Decision Option G), in alignment with prior PUC concerns, that would protect all ratepayers' choices, while allowing Xcel Energy to move forward with the creation of new programs. At the very least, the Public Utilities Commission should provide the public a detailed accounting of its own deliberation.

Thank you for your consideration,



Aaron Hanson