

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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Chair  
Commissioner  
Commissioner  
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In the Matter of an Xcel Payment Plan Credit  
Proposal

ISSUE DATE: April 7, 2021

DOCKET NO. E-002/M-20-760

ORDER APPROVING PAYMENT  
PLAN CREDIT PROGRAM

**PROCEDURAL HISTORY**

On March 25, 2020, in response to the governor’s Emergency Executive Order 20-01 declaring a peacetime emergency to protect Minnesotans from the COVID-19 pandemic, the chair of the Commission and the commissioner of the Department of Commerce issued a joint letter in Docket No. E,G-999/CI-20-375 (the residential customer protection docket) asking all Minnesota electric and gas utilities to undertake certain voluntary, temporary actions—including restricting residential service disconnections, reconnecting service, waiving late fees, and arranging payment plans—to help customers facing difficulties during the emergency.<sup>1</sup>

On May 20, 2020, in Docket No. E,G-999/CI-20-492 (the economic recovery docket), the Commission opened an inquiry into rate-regulated electric and gas utilities’ ongoing, planned, or possible investments that may assist in Minnesota’s economic recovery from the pandemic.<sup>2</sup>

On September 16, 2020, in the economic recovery docket, Northern States Power Company d/b/a Xcel Energy (Xcel) filed a set of proposals that may assist in the state’s economic recovery, including a proposal for a \$17.5 million Payment Plan Credit program under which residential electric customers with past-due balances between \$1,000 and \$4,000 would be eligible to receive 75% of their balance in bill credits over a term of up to 11 months if they enter into a payment plan and continue to make monthly payments as arranged.<sup>3</sup>

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<sup>1</sup> *In the Matter of an Inquiry into Actions by Electric and Natural Gas Utilities in Light of the COVID-19 Pandemic Emergency*, Docket No. E,G-999/CI-20-375 (residential customer protection docket).

<sup>2</sup> *In the Matter of an Inquiry into Utility Investments that May Assist in Minnesota’s Economic Recovery from the COVID-19 Pandemic*, Docket No. E,G-999/CI-20-492 (economic recovery docket), Notice of Reporting Required by Utilities (May 20, 2020).

<sup>3</sup> Economic recovery docket, Xcel’s Response and Petition, Attachment D, Payment Plan Credit Proposal (September 16, 2020).

On October 6, 2020, in this docket, the Commission issued a notice inviting comments on the merits of Xcel's proposed Payment Plan Credit program, the proposal's responsiveness to the residential customer protection docket, and certain details of the proposed program, including eligibility criteria, payment-plan terms, outreach and communications, and cost recovery.

On November 6, 2020, Fresh Energy, National Housing Trust, and Natural Resources Defense Council (collectively, the Fresh Energy group) filed joint comments generally supporting the program but proposing to lower the eligible arrearage threshold, restrict program eligibility and adjust credit amounts based on income, open the program to customers with existing payment plans, and allow customers to remain in the program if they miss no more than three payments. The group also recommended that Xcel improve its customer outreach and communication efforts and offer long-term payment arrangements to customers ineligible for this program.

On November 6, 2020, the Citizens Utility Board of Minnesota (CUB) and Energy CENTS Coalition (Energy CENTS) filed joint comments recommending that Xcel modify the program so that participants would be removed only after missing two consecutive payments and would not be penalized for paying off their balances early. With these modifications, they recommended that the Commission approve the program and require status reports to evaluate its effectiveness.

On November 6, 2020, the Department of Commerce, Division of Energy Resources filed comments recommending that the Commission approve the proposed program and require Xcel to send past-due customers information about existing assistance programs and opportunities to arrange payment plans.

On November 6, 2020, the Office of the Attorney General – Residential Utilities Division (the OAG) filed comments recommending that the Commission approve the proposed program.

On November 23, 2020, Xcel filed reply comments opposing the Fresh Energy group's proposed modifications, but stating that it agreed to the payment-flexibility modifications and reporting requirements CUB and Energy CENTS recommended.

On November 23, 2020, CUB and Energy CENTS filed reply comments opposing the Fresh Energy group's proposed modifications and recommending approval of Xcel's proposal.

During the Commission's December 17, 2020 meeting on Xcel's stay-out and true-up petition, Xcel committed to bear the entire cost of the proposed \$17.5 million Payment Plan Credit program and not seek recovery from ratepayers if approved. The Commission accepted Xcel's commitment as a condition of the approval of Xcel's stay-out and true-up petition.<sup>4</sup>

On March 11, 2021, the Commission met to consider the Payment Plan Credit program proposal.

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<sup>4</sup> *In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of 2021 True-Up Mechanisms*, Docket No. E-002/M-20-743, Order Approving True-Ups with Modifications and Requiring Xcel to Withdraw Its Notice of Change in Rates and Interim Rate Petition, at Ordering Para. 13 (April 2, 2021). As a part of this commitment, Xcel agreed that any part of the \$17.5 million not exhausted by the Payment Plan Credit program will be used to fund similar programs at the Commission's discretion. *Id.*

## **FINDINGS AND CONCLUSIONS**

### **I. Xcel's Proposal**

Xcel proposed a two-year Payment Plan Credit program that would provide \$17.5 million in bill credits to assist residential electric customers who have past-due balances between \$1,000 and \$4,000 and do not already have a payment-plan arrangement with Xcel. Customers enrolling in the program would enter into a payment plan and become eligible for bill credits equal to 75% of their balance. An upfront credit equal to 25% of the customer's balance would apply to the account at the beginning of the month following enrollment. The remaining credit totaling 50% of the customer's beginning balance would be credited in equal monthly installments over the rest of the payment-plan term, up to 11 months. Customers would have to continue making payments as arranged in order to continue receiving the monthly bill credits. Xcel estimated that about 11,600 customers would receive bill credits under the program.

Xcel originally proposed to fund the program through an increase in the electric low-income energy discount surcharge for all customer classes. However, as a condition of the Commission's approval of Xcel's stay-out and true-up petition, the Commission accepted Xcel's commitment to bear the entire cost of the \$17.5 million Payment Plan Credit program.<sup>5</sup> Thus, Xcel withdrew its request to recover the costs of this program from ratepayers.

Xcel contends that the program will aid in Minnesota's economic recovery from the COVID-19 pandemic by helping customers who have fallen far behind on their electric bills—including those who may not qualify for income-restricted assistance programs—to catch up on their accounts and avoid falling further behind. Xcel argues that this program will prevent service disconnections when seasonal and pandemic-related disconnection suspensions are lifted, as customers with high arrearages are most at risk of being unable to catch up without assistance.

The OAG asserted that the program will also benefit Xcel and its shareholders through increased customer retention and revenue, reduced bad-debt write-offs, and reduced disconnection costs.

All parties and participants who commented in this docket expressed support for the program overall as a reasonable and prudent way to assist customers who have fallen behind on their electric bills amid the economic slowdown related to the COVID-19 pandemic. However, some participants recommended modifying certain aspects of Xcel's proposal, as discussed below.

### **II. Proposed Modifications**

#### **A. Program Eligibility**

Xcel proposed to open the program to residential customers with past-due balances between \$1,000 and \$4,000. Only customers who are not already on a payment plan would be eligible, because one goal of the program is to encourage customers who have not already done so to initiate a payment-arrangement conversation with Xcel and begin making payments on a manageable schedule.

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<sup>5</sup> *Id.*

The Fresh Energy group argued that Xcel should not exclude from the bill-credit program customers who, proactively, have already entered into payment plans with Xcel. The group also recommended lowering the minimum arrearage so that customers with balances between \$300 and \$1,000 would also be eligible, arguing that customers may still have difficulty paying past-due balances in this lower range and should be eligible for assistance if they need it.

CUB and Energy CENTS argued that the \$1,000 to \$4,000 arrearage range is reasonable because it represents the most significantly past-due customers who are most at risk for disconnection when the disconnection suspension ends. They argued that this eligibility range would give the program an appropriate balance between the number of customers helped and the amount of assistance available to each participating customer.

In reply comments, Xcel argued that lowering the minimum arrearage without significantly increasing program funding would require Xcel to reduce the bill-credit amount for each participant. Xcel contended that customers with at least \$1,000 past due are at the highest risk of falling further behind and being unable to catch up, and that decreasing the amount of bill credits provided to each of these customers would reduce the program's probability of succeeding in its goals of eliminating customers' past-due balances and preventing service disconnections.

## **B. Income-Based Criteria**

The Fresh Energy group argued that Xcel should restrict the program to households with incomes no higher than 200% of the federal poverty level and offer additional assistance to those with incomes at or below 50% of the federal poverty level. The group also argued that the program should aim to lower the percentage of household income spent on energy costs.

Xcel contended that restricting eligibility based on income would reduce the program's effectiveness as a tool to aid in economic recovery from the COVID-19 pandemic. Xcel argued that the pandemic led to unique economic circumstances in which many Minnesotans are facing hardships that may not be reflected in household-income figures. Xcel noted that lower-income customers already have access to existing income-based assistance programs, such as the Low-Income Home Energy Assistance Program (LIHEAP) and PowerOn. The Payment Plan Credit program is designed to reach a broader set of customers, including those who do not qualify for existing assistance programs. Additionally, Xcel stated that adding income-based criteria would impose additional administrative burdens and costs, potentially delaying implementation and making the program less cost effective.

CUB and Energy CENTS opposed the Fresh Energy group's recommendations, arguing that untethering the program from income levels will allow it to reach customers who have fallen behind in the pandemic-related economic downturn and are struggling to manage sizeable past-due electric bills but are ineligible for existing assistance programs. They argued that an income-based model is inappropriate for this program's specific purpose, to provide one-time assistance to help customers recover from this unique period of pandemic-related financial hardship.

## **C. Payment Flexibility**

The Fresh Energy group recommended that customers be allowed to remain in the program unless they miss four payments over the term of the payment plan, rather than being removed after a single missed payment as initially proposed by Xcel.

CUB and Energy CENTS recommended that participants be allowed to remain in the program unless they miss two consecutive payments. Additionally, they argued that participants should not be penalized for paying off their balances in full earlier than the payment-plan terms require. Rather, program participants who successfully pay off their balances early should still receive the full bill-credit amount they were originally entitled to under the program.

Xcel agreed to adopt both of the payment-flexibility modifications recommended by CUB and Energy CENTS.

### **III. Commission Action**

#### **A. Overall Program and Funding**

The Commission finds that Xcel's proposed Payment Plan Credit program is a reasonable and prudent measure to help customers who have fallen behind on their electric bills in the pandemic-related economic slowdown to catch up on their accounts and prevent service disconnections. The program will provide meaningful relief and encourage struggling customers to work with Xcel to arrange an achievable strategy to get their accounts back on track. This program will complement the measures Xcel has already undertaken to assist customers in the peacetime emergency pursuant to the residential customer protection docket. Accordingly, the Commission will approve the Payment Plan Credit program as outlined below.

Xcel's commitment to bear the cost of the \$17.5 million program without seeking recovery from ratepayers will benefit not only those participants receiving bill credits under the program, but also Xcel customers generally, many of whom across all customer classes are facing difficulties related to the pandemic. Further, Xcel's funding commitment will benefit the utility itself through increased customer retention and revenue, reduced bad-debt write-offs, and reduced disconnection costs. The Commission therefore accepts as reasonable Xcel's commitment to fund the program and not seek recovery from ratepayers.

#### **B. Program Eligibility**

The Commission will allow Xcel to restrict the Payment Plan Credit program to customers who are not already engaged in payment plans. Xcel's proposal will encourage customers who have not yet sought help with a payment plan to begin a conversation with Xcel about their options for arranging a workable plan to get their accounts back on track. This restriction comports with the program's goal to encourage struggling customers who have not yet done so to reach out to Xcel, set up a new payment plan, and begin making payments on a manageable schedule. Additionally, the proposal to tailor this program to customers without an existing payment plan is reasonable because eligible customer arrearages will likely exceed available program funds even if customers with preexisting payment plans are excluded.

However, if excess funds remain available later in the program's implementation, Xcel could consider whether expanding program eligibility to customers with preexisting payment plans may be appropriate to ensure program funds are put to effective use.

The Commission will approve Xcel's proposed eligible arrearage range of \$1,000 to \$4,000, without income-based restrictions. These eligibility criteria reasonably target customers who are most likely to benefit from the program, who are at serious risk of falling further behind on their

bills and being unable to catch up before the disconnection suspension is lifted. This group is appropriately defined to include customers who may not qualify for existing energy-assistance programs based on income levels, but who nevertheless face challenges related to the economic slowdown and may not have a manageable path to balance their accounts without assistance.

As some participants pointed out, the program as proposed will not resolve all customer arrearages and will not reach everyone who could use assistance. The Commission appreciates the comments of Dr. Gabriel Chan which explored ways to ensure that economic recovery efforts address inequities and serve under-resourced households and communities.<sup>6</sup> Additionally, the Commission appreciates the Fresh Energy group's comments regarding the importance of assisting low-income households and customers with past-due bills that do not meet the thresholds Xcel proposed for this program.

The Commission recognizes the hardships impacting many Minnesotans and encourages customers in need who do not qualify for this program to explore other options that may be available to them, such as LIHEAP, PowerOn, or alternative payment arrangements with their utilities, if needed. However, the Commission is not persuaded that imposing income-based criteria or other eligibility restrictions would improve the effectiveness of this particular program or achieve more equitable outcomes in this case.

Xcel's proposed Payment Plan Credit program is a welcome supplement to existing assistance programs and will relieve a need brought about by the COVID-19 pandemic that is not fully addressed by existing programs. The program is reasonably and prudently designed to allocate finite resources toward helping an appropriately targeted set of customers to recover from the current, unique, pandemic-specific economic circumstances. Therefore, the Commission will approve it with the eligibility criteria proposed by Xcel.

### **C. Payment Flexibility**

The Commission will approve as reasonable the payment-flexibility modifications proposed by CUB and Energy CENTS and agreed to by Xcel. Allowing participants to stay in the program unless they miss two consecutive payments provides a reasonable degree of flexibility for customers facing financial difficulties while maintaining an appropriate incentive to avoid falling further behind.

Additionally, it is reasonable to provide customers the full bill-credit amount even if they pay off their balances before the end of the payment-plan term. Pursuant to the program's goal of helping customers catch up on past-due electric bills, this measure is appropriate to avoid disincentivizing participants from paying sooner if they are able.

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<sup>6</sup> Dr. Chan, an assistant professor at the Center for Science, Technology, and Environmental Policy at the University of Minnesota's Humphrey School of Public Affairs, made oral comments during the March 11, 2021, Commission meeting in this docket, referencing written comments he filed in the related economic recovery docket and residential customer protection docket on October 19, 2020.

#### **IV. Reporting Requirements**

CUB and Energy CENTS proposed that the Commission require Xcel to file status reports four, nine, and fifteen months after the project's implementation, and a final report two months after the two-year program has ended. They recommended that the reports include information on Xcel's outreach activities, the numbers of eligible and enrolled customers, current and projected spending, the initial and remaining past-due balances of participating customers, the number of participating customers who are current on their payment plans or have paid their balances in full, and the number of customers removed from the program due to missed payments.

Xcel and other parties and participants broadly supported the proposed reporting requirements.

To enable the Commission and stakeholders to monitor the program's progress, evaluate the program's effectiveness, and propose future modifications if appropriate, the Commission will require Xcel to file periodic program status reports and a final report after the program concludes, as set forth in the ordering paragraphs below.

#### **ORDER**

1. The Commission approves, as reasonable and prudent and sufficiently developed in the record, the Payment Plan Credit program proposed by Northern States Power Company, d/b/a Xcel Energy (Xcel), and the overall design of the program, including:
  - a. The customer arrearage eligibility threshold between \$1,000 and \$4,000.
  - b. Xcel's criteria regarding payment-plan duration.
  - c. Xcel's customer-outreach and communication plan for the program.
  - d. Xcel's commitment to pay the \$17.5 million of bill credits for its customers. Any remaining amount of this \$17.5-million program fund not used to pay for the costs of this program shall be used to fund similar programs at the Commission's direction.
2. Xcel shall allow arrearage customers on payment-plan arrangements who miss up to two consecutive payments to remain in the Payment Plan Credit program.
3. Xcel shall provide program status reports at the following intervals after the program begins:
  - a. 4 months
  - b. 9 months
  - c. 15 months
  - d. 26 months

4. Xcel shall include the following information in the program status reports:
  - a. The outreach activities conducted to date and any plans for additional outreach.
  - b. The number of customers eligible to participate, total and by ZIP code.
  - c. The number of customers enrolled in the program, total and by ZIP code.
  - d. Program spending to date and a projection of total spending.
  - e. The average initial and remaining arrears of participating customers.
  - f. The number of customers who are current on their payment plans under the program.
  - g. The number of customers who have missed two consecutive payments and have been disqualified from the program.
  - h. The number of customers who have paid off the full amount owed under a payment plan in this program.
5. The Commission accepts Xcel's Payment Plan Credit program as a responsive measure to COVID-19 issues contemplated in the residential customer protection docket, Docket No. E, G-999/CI-20-375, and accepts that Xcel's commitment to bear the cost of the program funding dovetails with that docket.
6. This order shall become effective immediately.

BY ORDER OF THE COMMISSION



Will Seuffert  
Executive Secretary



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## **CERTIFICATE OF SERVICE**

I, Robin Benson, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or 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.

**Minnesota Public Utilities Commission**  
**ORDER APPROVING PAYMENT PLAN CREDIT PROGRAM**

Docket Numbers: **E-002/M-20-760**

Dated this **7th** day of **April, 2021**

/s/ Robin Benson

[illegible]

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND	81 E Little Canada Road  St. Paul, Minnesota 55117	Electronic Service	No	OFF_SL_20-760_Official
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_20-760_Official
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206  St. Paul, MN 551011667	Electronic Service	No	OFF_SL_20-760_Official
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duulth, MN 55802	Electronic Service	No	OFF_SL_20-760_Official
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-760_Official
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390  St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-760_Official
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-760_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-760_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190  Richfield, MN 55423	Electronic Service	No	OFF_SL_20-760_Official

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Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd  St. Paul, MN 55102	Electronic Service	No	OFF_SL_20-760_Official
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Jamez	Staples	jstaples@renewablepartners.com	Renewable Energy Partners	3033 Excelsior Blvd S  Minneapolis, MN 55416	Electronic Service	No	OFF_SL_20-760_Official
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-760_Official
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321  Milwaukee, WI 53203	Electronic Service	No	OFF_SL_20-760_Official
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Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street  Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-760_Official
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-760_Official
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Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_20-760_Official
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_20-760_Official
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Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-760_Official