

**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 an Xcel Payment Plan Credit Proposal

Docket No. E002/M-20-760

Comments of the Citizens Utility Board of Minnesota

I. Introduction

The Citizens Utility Board of Minnesota (“CUB”, “we”, “our”, “us”) submits these comments in response to the Commission’s July 24, 2023 Notice of Comment Period. In short, we recommend that the Commission approve Xcel’s proposal regarding the remaining funds from its Payment Plan Credit Program (the “Program”). We offer some observations and comments below that we hope help preserve some lessons learned from this Program.

II. Procedural History

Xcel Energy (“Xcel” or “the Company”) filed comments on September 15, 2020 in Docket number 20-492 (the “Economic Recovery Docket”) outlining numerous proposals that could aid in Minnesota’s economic recovery in the wake of the COVID-19 Pandemic.¹ Among Xcel’s proposals filed in that docket was a proposal to establish a Payment Plan Credit program, which Xcel summarized at the time as follows:

The Payment Plan Credit program has been designed to provide relief to residential electric customers who are in arrears and have continued to accumulate a delinquent balance during the months of the pandemic. Customers with a current balance between \$1,000 and \$4,000 are eligible to receive 75 percent of their balance in bill credits issued as a partial up-front credit and then monthly bill credits for up to eleven months, provided they continue to make payments as arranged. We have targeted this customer segment as having large enough arrears to be most at risk of permanently falling behind in their payments. The program will provide up to \$17.5 million in bill credits funded through an increase to the existing Low-Income Surcharge for a period of two years.²

¹ *In the Matter of an Inquiry into Utility Investments that May Assist in Minnesota’s Economic Recovery from the COVID-19 Pandemic*, Xcel Energy, Response and Petition – COVID-10 Relief & Recovery, Docket No. E,G999/CI-20-492 (Sept. 15, 2020) (“Xcel Response and Petition”).

² *Id.* at Attachment D, Page 1.

On October 16, 2020, CUB filed comments in the Economic Recovery Docket recommending that the Commission and utilities proactively consider how economic development initiatives address inequities in Minnesota.³ Specifically, we recommended that the Commission prioritize approval and/or acceleration of initiatives that had a clear, measurable impact for those communities who are negatively affected by current and historical economic conditions that the investments seek to mitigate. Likewise, we recommended that the Commission decline to approve or accelerate projects that were likely to reinforce or contribute to existing inequities. Viewing Xcel's proposals in the Economic Recovery Docket through this lens, CUB identified the Payment Plan Credit Proposal as one that could have a measurable impact on ratepayers most in need of assistance without further contributing to inequities.⁴

On September 14, 2020, Xcel cross-filed a petition in the Economic Recovery Docket and Docket 20-760 for approval of various "Tranche 1" projects, including the Payment Plan Credit Proposal. Xcel contended that the Program would aid in Minnesota's economic recovery from the COVID-9 pandemic by helping customers who had fallen behind on their electric bills catch up, avoid falling further into arrears, and avoid disconnection upon expiration of a Commission-ordered suspension on disconnections.

In joint comments CUB and Energy CENTS Coalition filed on November 6, 2020, we applauded Xcel for developing the Program and, subject to a few recommendations, supported its approval.⁵ Our recommendations included the following:

- the Commission should require Xcel to share information in a future reporting period regarding Program participation as well as the number of customers who were excluded from participation by owing more than \$4,000 at the time the Program is implemented.
- when negotiating payment plan duration, customers should be allowed to spread payments out over the full 11 months or to make fewer payments in higher amounts, at their discretion. Customers should not be penalized for choosing to pay their balance off ahead of schedule;
- only customers who miss two consecutive payments should be disqualified from participating in the Program; and
- the Commission should establish a reporting process (based on the detailed contents we proposed) to allow the Commission and stakeholders to evaluate the effectiveness of the Program

In an order issued March 12, 2021, the Commission determined that various projects Xcel proposed in the Economic Recovery Docket, including the Payment Plan Credit Program, "have the potential to

³ *In the Matter of an Inquiry into Utility Investments that May Assist in Minnesota's Economic Recovery from the COVID-19 Pandemic* CUB Comments, Docket No. E,G999/CI-20-492 (Oct. 16, 2020).

⁴ *Id.* at 7.

⁵ *In the Matter of an Xcel Payment Plan Credit Proposal*, CUB and ECC Joint Comments, Docket No. E-002/M-20-760 (Nov. 6, 2020).

be consistent with the Commission's request for proposals that could assist with economic recovery" consistent with the Commission's prior order in that docket.⁶

On April 7, 2021, the Commission issued an order approving the Payment Plan Credit Program and establishing requirements for its implementation.⁷ The Commission's requirements generally included and adopted CUB's and ECC's recommendations. Also, as the Commission noted:

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. Thus, Xcel withdrew its request to recover the costs of this program from ratepayers.⁸

Subsequently, Xcel filed 4-, 9-, 15-, and 26-month status reports discussing the ongoing implementation of the Program.⁹ In its latest filing, Xcel reported that, as of June 30, 2023, it had applied or allocated approximately \$16.6 million (of the \$17.5 million total budget) to customer accounts, and that the Program had a remaining balance of \$855,405.¹⁰ The Company proposed to close the program by October 1, 2023 by taking the following steps¹¹:

1. close the Program to new participants;
2. for existing Program participants on current payment plans as of August 30, 2023, apply to their account a lump sum equaling the remaining monthly installments scheduled for their account;
3. following the above lump sum payments, distribute all remaining Program funds in equal shares to each customer that participated in the Program;
4. provide a communication explaining the above steps to Program participants; and
5. submit a final report regarding Program completion on November 1, 2023.

Through its July 24, 2023 Notice of Comment Period, the Commission seeks comments on the following:

⁶ *In the Matter of an Inquiry into Utility Investments that May Assist in Minnesota's Economic Recovery From the COVID-19 Pandemic*, Order Determining that Proposals Have the Potential to be Consistent with COVID-10 Economic Recovery, Docket No. E-G-999/CI-20-492 (March 12, 2021).

⁷ *In the Matter of an Xcel Payment Plan Credit Proposal*, Order Approving Payment Plan Credit Program, Docket No. E-002/M-20-760 (Apr. 7, 2021).

⁸ *Id.* (internal cites omitted).

⁹ *See generally*, Xcel filings in Docket No. E-002/M-20-760.

¹⁰ *In the Matter of an Xcel Payment Plan Credit Proposal*, 26-Month Status Report Payment Plan Credit Proposal, Docket No. E-002/M-20-760 (July 14, 2023), p. 2.

¹¹ *Id.* at. 4.

- 1) Has Xcel proposed a reasonable and equitable approach to distributing the remaining amount of \$855,405 from the Commission approved Xcel Payment Plan Credit Program amount of \$17.5 million, as currently filed?
- 2) Should the Program period for disbursement of all funds be extended until the funds are fully exhausted?
- 3) Should the remaining funds be deployed for use to other ratepayer-assistance programs, such as the Power-On program, etc.?
- 4) Are there other issues or concerns related to this matter?

III. Analysis

We, again, wish to express our appreciation to Xcel for implementing the Payment Plan Credit Program. We continue to believe it aligns with the Commission's goals in opening the Economic Recovery Docket, and that it helped some customers address and reduce arrearages and avoid disconnection. We also recognize and appreciate that Xcel funded this program using shareholder dollars.

Upon review of Xcel's 26-month report, we noted some concerns and questions. Namely, we were concerned that a majority of customers participating in the Program were disqualified before paying down the full amount of their arrearages. As Xcel reported:

To summarize, through June 2023, the Program has enrolled 17,229 customers, and on average the balance of enrolled customers has been reduced by \$1,568. At this time, 452 customers remain enrolled in the Program. An additional 3,788 customers have completed their arrangement and received the full benefit allotted to them. A total of 12,989 customers have been disqualified from the Program, primarily due to missing two consecutive payments. This total also includes customers who have stopped service with the Company and are no longer active customers.¹²

We wondered why this was the case and/or if Xcel's experience managing this Program somehow informed its process, generally, for establishing and maintaining payment arrangements for customers in arrears.

We appreciate Xcel's willingness to talk through these questions prior to our submitting these comments. From those conversations, it is our understanding that most of those who dropped off/were disqualified from the Program had missed more than two payments. A smaller number of participants who dropped off the Program did so because they moved out of Xcel service territory while they were on it and/or shifted to other affordability programs for which they were eligible and that allowed for lower monthly payments. Xcel noted that a fair number of participants who dropped off the Program still paid down a significant portion of their arrears and were then able to pay off the

¹² *In the Matter of an Xcel Payment Plan Credit Proposal*, Xcel 26-Month Status Report, Docket No. E-002/M-20-760 (July 14, 2023).

rest (for some, including through qualification for Energy Assistance) to avoid disconnection. Though, some participants who did not make payments ultimately were disconnected.

Xcel also noted that managing this program was more administratively burdensome than more typical payment plan arrangements. It required Xcel staff to track individual participant accounts and make manual adjustments more often than when administering more traditional payment arrangements. Finally, Xcel noted that anyone who was removed from the Program was still eligible for other Xcel programs but could not reapply for this the Payment Plan Credit Program.

We believe Xcel has proposed a reasonable and equitable approach to distributing the remaining amount of \$855,405 from the Commission approved Xcel Payment Plan Credit Program, and we do not deem it necessary to extend the period for disbursements of all funds until the funds are exhausted. Should other parties recommend, and the Commission be persuaded, that the remaining funds should be deployed for use in other ratepayer-assistance programs, such as the Power-On program, we are not opposed to that approach.

IV. Conclusion

CUB respectfully recommends that the Commission:

- 1) accept Xcel's 26-month status report;
- 2) approve Xcel's proposal for distributing the remaining amount of \$855,405 from the Commission approved Xcel Payment Plan Credit Program; (or, in the alternative, re-deploy remaining funds for use in other ratepayer-assistance programs, such as the Power-On program); and
- 3) not extend the Program period until the funds are fully exhausted.

Thank you for your consideration.

Sincerely,

August 18, 2023

/s/ Brian Edstrom

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