

Staff Briefing Papers

Meeting Date March 21, 2019 Agenda Item *3

Company Xcel Energy

Docket No. **E,G-002/M-19-134**

In the Matter of Xcel Energy's Petition for Approval of Modifications to its Standard Billing Form to add Certain Spanish Translation Elements

Issues 1. Should the Commission approve Xcel's proposed inclusion of Spanish language terms in its electricity and gas service billing materials?

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 **Relevant Documents**

Date

Xcel Energy's Tariff Filing	February 1, 2019
Comments: Minnesota Department of Commerce (DOC)	February 11, 2019

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The attached materials are work papers of the Commission Staff. They are intended for use by the Public Utilities Commission and are based upon information already in the record unless noted otherwise.

I. Statement of the Issues

Should the Commission approve Xcel's proposed inclusion of Spanish language terms in its electricity and gas service billing materials?

II. Background

On February 1, 2019, Xcel submitted a petition to modify its Standard Billing Form to add select Spanish translations as set forth in its Minnesota Electric and Natural Gas Rate Books. Xcel seeks to modify its billing form (1) to add the phrase **(Balance de su cuenta)** to immediately follow the phrase **ACCOUNT BALANCE**, and (2) to add the phrase **(Cantidad debida)** to immediately follow the phrase **AMOUNT DUE**.

On February 11, 2019, DOC filed comments recommending approval of Xcel's proposal.

III. Parties' Comments

A. Xcel Petition

Xcel states:

In examining call trends for the Company's affiliate Southwestern Public Service Company (SPS) operating company, they identified a top reason for billing related calls were from Spanish-speaking customers requesting straightforward information such as their account balance. ... We decided to add certain Spanish language translations to the headings of key aspects of the bill, including account balance, to facilitate better understanding of the basic billing elements. These additions not only helped customers better understand their bill, it also reduced their need to call with questions regarding their balance or the bill's due date – resulting in an enhanced customer experience and fewer customer calls for the Company. We are proposing to implement these bill changes in Minnesota, which we believe will also aid Spanish-speaking Minnesotans.¹

Further, Xcel states:

We chose these bill elements to maximize understanding of key billing components – also with efficiency in mind. Specifically, we can add the Spanish translation to these bill labels without the need for software changes in our customer information system – and avoiding the addition of extra pages to the bill – both of which save one-time and ongoing (postage) costs. Otherwise, the design and format of the bill

¹ Petition, p. 3.

remain unchanged. ... We believe these proposed changes are appropriate to also implement in Minnesota. Spanish leads the nearest other language spoken in the homes of Minnesotans ages five and older by a significant margin. According to the Minnesota State Demographic Center, in 2015, 11.1 percent of Minnesotans (age 5+) spoke a language other than English at home; behind English, the most common language spoken is Spanish, with about 194,121 speakers. By taking advantage of available space on the existing Standard Bill Forms, we are able to implement this change at little incremental cost – and expect it to significantly improve service to our Spanish-speaking customers.²

B. DOC Comments

DOC recommends approval of the petition, stating:

[T]he proposed modifications to the electric and natural gas bill labels will positively impact its Spanish-speaking customers’ understanding of their energy bills. If more customers understand their energy bill, it logically follows that the Company will receive fewer customer inquiries for clarification on the basic bill elements. Reducing the volume of customer inquiries may create an opportunity to improve the Company’s efficiency in its customer service operations.³

IV. Staff Analysis

Table 1 below approximates the layout of the portion of Xcel’s customer bills in question. Table 2 indicates how Xcel proposes to add Spanish translations of “Account Balance” and “Amount Due.”

Table 1. Approximation of Relevant Feature of Xcel’s Current Bill

ACCOUNT BALANCE	
Previous Balance	\$0.00
Payment Received	\$0.00
Balance Forward	\$0.00
Current Charges	\$0.00
AMOUNT DUE	\$0.00

² Petition, p. 4.

³ DOC Comments, p. 1.

Table 2. Approximation of Relevant Feature of Xcel’s Bill including Xcel’s Proposed Language

ACCOUNT BALANCE (Balance de su cuenta)	
Previous Balance	\$0.00
Payment Received	\$0.00
Balance Forward	\$0.00
Current Charges	\$0.00
AMOUNT DUE (Cantidad debida)	\$0.00

“Balance de su cuenta” can be interpreted literally as “balance of your account.”⁴ “Cantidad debida” can be translated literally as “amount owed.” One alternative translation of “amount due” is “cantidad a pagar” which can be translated literally as “amount to be paid.” This alternative translation may project a softer tone than “cantidad debida.”

The Commission may wish to consider another alternative to Xcel’s proposal, one that includes additional translation as shown in Table 3.

Table 3. Approximation of Relevant Feature of Xcel’s Bill – Xcel’s Proposed Language Added and Augmented by Staff

ACCOUNT BALANCE (Balance de su cuenta)	
Previous Balance (balance previo)	\$0.00
Payment Received (pago recibido)	\$0.00
Balance Forward (balance)	\$0.00
Current Charges (nuevos cargos)	\$0.00
AMOUNT DUE (Cantidad debida)	\$0.00

The additional translations in Table 3 may increase understanding among Spanish speakers and, potentially, further reduce call-center traffic. Staff does not know if inclusion of the additional language is cost-effective or overly burdensome to Xcel. Xcel can respond to those questions at the hearing.

It should be noted that adding language to bills can increase complexity, rendering bills more difficult to understand. Note, too, that Minnesota is home to large populations for whom English is not a first language and who, too, could benefit from translations (i.e. Hmong, Lao, Vietnamese and Somali).

Staff makes no recommendation as to preferred alternatives.

⁴ Staff relies on the expertise of Spanish-speaking coworkers for Spanish translations appearing in this Briefing Paper.

V. Decision Options

1. Reject Xcel's petition, making no changes to the Standard Billing Form.
2. Approve Xcel's petition as filed.
3. Approve Xcel's petition, replacing "cantidad debida" with "cantidad a pagar."
4. Approve Xcel's petition, modified to include the additional translations displayed in Table 3.
5. Approve Xcel's petition, modified to include the additional translations displayed in Table 3, AND to replace "cantidad debida" with "cantidad a pagar."
6. Take other action.