

## NOTICE OF REPORTING, COMMENT PERIOD AND PROCEDURE

Issued: April 14, 2020

### In the Matter of the an Inquiry into Actions by Electric and Natural Gas Utilities in Light of the COVID-19 Pandemic Emergency

**PUC Docket Number: E,G999/CI-20-375**

#### Rate-Regulated Utility Reporting Requests (see Attachment A)

Due on the 20<sup>th</sup> of each month (starting May 20) until further notice

**Comment Period:** Comments due May 14, 2020

Reply comments due May 25, 2020

#### Background

On March 25, 2020, the Commission and Department of Commerce jointly issued a letter requesting gas and electric utilities restrict disconnections, reconnect customers who were previously disconnected, waive late fees, and arrange payment plans with the individual customer circumstances in mind. By April 3, 2020, all rate-regulated utilities and many cooperative and municipal utilities responded.

#### Goals and Next Steps in Docket

Having now received the rate regulated utilities' responses, the Commission will require, as a starting point, rate-regulated utilities to submit data as outlined in Attachment A, and requests further comments on additional information, as outlined in Attachment B.

Commenters should consider the following goals in submitting comments:

*Data and comments that are actionable:* The reporting requirements in Attachment A are intended to be neutral, factual data that may allow the Commission or policymakers to act on that data.

*Concise and Understandable Data:* The Commission and Department issued the letter to utilities in this docket to provide transparency. To the extent that the Commission requires rate-regulated utilities to file additional data on the possible impacts of the COVID-19 pandemic on ratepayers' ability to pay their utility bills, that data should be concise and understandable for stakeholders, policymakers, and the public. The Commission also suggests that commenters be mindful of the staffing resources of utilities, state agencies, and other relevant entities at this time.

*Data Relevant to the Purpose of the Docket:* Comments should focus on the purpose of the docket: how the Commission can assist in maintaining utility service for ratepayers either through action of its own or by providing a forum for neutral data to assist policymakers.

**Filing Requirements:** Utilities, official parties, and state agencies are **required** to file documents using the Commission’s electronic filing system (eFiling). All parties, participants and interested persons are encouraged to use eFiling: [mn.gov/puc](http://mn.gov/puc), select *eFiling*, and follow the prompts.

**Submit Public Comments:**

**Online:** Visit [mn.gov/puc](http://mn.gov/puc), select [Comment](#) and follow the prompts

**Email:** [consumer.puc@state.mn.us](mailto:consumer.puc@state.mn.us)

**U.S. Mail:** Consumer Affairs Office  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul MN 55101

**Phone:** 651-296-0406/1-800-657-3782 (If you are a member of the public and need assistance or have questions about submitting public comments)

**Full Case Record:** See all documents filed in this docket via the Commission’s website at [mn.gov/puc](http://mn.gov/puc), select *Search eDockets*, enter the year (20) and the docket number (375), select *Search*.

**Subscribe** to receive email notification when new documents are filed in this docket at [mn.gov/puc](http://mn.gov/puc), select *Subscribe*, or click [HERE](#) and follow the prompts.

**Questions about this docket or Commission process and procedure?** Contact Commission staff, Hanna Terwilliger, at [Hanna.Terwilliger@state.mn.us](mailto:Hanna.Terwilliger@state.mn.us).

**Change your mailing preferences:** Email [docketing.puc@state.mn.us](mailto:docketing.puc@state.mn.us) or call Leesa Norton at 651-201-2246.

To request this document in another format such as large print or audio, call 651-296-0406 (voice). Consumers with a hearing or speech impairment may call using their preferred Telecommunications Relay Service or email [consumer.puc@state.mn.us](mailto:consumer.puc@state.mn.us) for assistance.

## Attachment A: Data for Further Action and Policymaking

The Commission requests a preliminary set of ongoing reporting from rate-regulated utilities as a starting point while soliciting input from stakeholders and utilities on what additional information may be needed. The Commission requests rate-regulated utilities file these reports in the present docket, 20-375. The Commission requests rate-regulated utilities begin reporting as listed in Attachment A on a monthly basis, on the 20<sup>th</sup> of each month.<sup>1</sup> Utilities can find templates for Attachments A-1 and A-2 in eDockets. Because the data in Attachment A-1 and A-2 are already reported in existing reports it can be compared to past data; in addition, it should not create an undue burden on utilities.

The Commission requests two sets of information utilities already report in annual dockets:

Attachment A-1: Data normally reported annually in electric Service Quality reports. Electric utilities submit these reports annually, with data broken down by month<sup>2</sup>. The Commission requests portion 1 for regulated gas and electric utilities, and portion 2 for electric only.

1. Information required under Minn. Rules [7826.1500](#), Reporting Involuntary Disconnections
  - a. the number of customers who received disconnection notices;
  - b. the number of customers who sought cold weather rule protection under Minnesota Statutes, sections 216B.096 and 216B.097, and the number who were granted cold weather rule protection;
  - c. the total number of customers whose service was disconnected involuntarily and the number of these customers restored to service within 24 hours; and
  - d. the number of disconnected customers restored to service by entering into a payment plan.
2. Information required under Minn. Rules [7826.1800](#), Reporting Emergency Medical Account Status (electric utilities only)
  - a. The annual service quality report must include the number of customers who requested emergency medical account status under Minnesota Statutes, section 216B.098, subdivision 5, the number whose applications were granted, and the number whose applications were denied and the reasons for each denial.

Attachment A-2: Copies of Cold Weather Rule monthly reporting from Docket 20-20. All regulated utilities submit monthly reports under the cold weather rule.<sup>3</sup> These reports include (among other data points) the following information:

1. Past due residential accounts
2. Total dollars past due on all residential accounts
3. Total dollars received from energy assistance
4. Length of disconnection information

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<sup>1</sup> For instance, a report covering the month of April would be due on May 20<sup>th</sup>.

<sup>2</sup> For 2019, the reports can be found in Dockets 20-401 (Otter Tail), 20-404 (Minnesota Power), and 20-406 (Xcel Energy).

<sup>3</sup> Reports found in the -02 dockets annually, for 2020, Docket No. 20-02, 2019 – 19-20.

## Attachment B: Questions for Utilities and Stakeholders

### **Additional Reporting and Data**

1. Commenters may provide feedback on the proposed reporting requirements for rate-regulated utilities in Attachment A, which would cease at a later time following the end of the pandemic.
2. Are utilities capable of providing additional data that may be useful to this inquiry, such as what number of customers with past due balances did not have past due balances prior to the pandemic?

### **Additional Commission Assistance for Utility Consumers**

Medical Account Status: Minn. Stat. §216.098 subd. 5 provides additional protections for customers where a medical emergency exists or where medical equipment requiring electricity necessary to sustain life is in use. In the 2018 electric service quality dockets, staff raised the issue of outreach on this protection, noting that some organizations did not know enough about it to recommend patients to apply. Utilities agreed to work on increased outreach.<sup>4</sup> During and after the pandemic, a much larger number of utility customers may be eligible for this protection.

3. Should the Commission make any clarifications as to the interpretation of this statute and to utility implementation of the statute in order to assist utilities or consumers in applying for this protection?

### Credit Reports

4. Should the Commission seek commitments from rate-regulated utilities to not make negative reports to credit reporting agencies for failure to pay utility bills during the pandemic? If so, should there be any conditions on this commitment?

### **Transition Plan for Past Due Customers after Pandemic**

5. Once the Governor's Peace Time Emergency is over, there may be a substantial number of utility ratepayers that have past due balances. Should the Commission provide any advance planning or assistance to ensure there are not significant numbers of customers at risk of disconnection after the conclusion of the pandemic? If so, what advance planning should the Commission conduct?

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<sup>4</sup> Staff briefing papers for April 18, 2019 agenda meeting, Docket Nos. 18-250, 18-247, and 18-239.