

August 27, 2024

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
Saint Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce**  
Docket No. E002/M-24-27

Dear Mr. Seuffert:

Attached are the Comments of the Minnesota Department of Commerce (Department) in the following matter:

*2023 Annual Electric Safety, Reliability, and Service Quality Report (Report)* submitted by Northern States Power Company, d/b/a Xcel Energy (Xcel or the Company).

In a Notice of Comment Period (NOC) dated July 26, 2024, the Minnesota Public Utilities Commission (Commission) requested comments on the issue of “What actions should the Commission take in relation to Xcel Energy’s Interactive Service Quality Map and Equity Analysis?”

In the attached Comments, the Department responds to the questions in the NOC and provides its recommendations.

The Department is available to answer any questions that the Minnesota Public Utilities Commission may have.

Sincerely,

/s/Dr. Sydnie Lieb  
Assistant Commissioner of Regulatory Analysis

JK/ad  
Attachment



## Before the Minnesota Public Utilities Commission

### Comments of the Minnesota Department of Commerce

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Docket No. E002/M-24-27

#### I. INTRODUCTION

The Minnesota Department of Commerce (Department) appreciates the opportunity to provide comments in response to the Minnesota Public Utilities Commission's (Commission) Notice of Comment Period (NOC) dated July 26, 2024.

The NOC included one issue and the following nine topics:

**Issue – What actions should the Commission take in relation to Xcel Energy's Interactive Service Quality Map and Equity Analysis?**

The Commission also identified the following nine topics:

1. In its April 1, 2024, Annual Report on Safety, Reliability, and Service Quality (SRSQ) Xcel Energy identified additional immediate steps it can take to expand outreach prior to disconnection that do not require Commission action. Are there other steps the Commission should take to address disparities in disconnections?
2. Should the Commission consider combining annual affordability reports (for example PowerOn) as part of the SRSQ reports going forward? If so, what reporting could be combined?
3. Are there other matters related to affordability and disconnections that should be reported or considered as part of the SRSQ reports going forward?
4. Should the Commission direct Xcel Energy to file its proposed Enhanced Vegetation Management Proposal and Targeted Undergrounding Proposal as described in its April 1, 2024, Annual Report on SRSQ? If so, when, and where should the Commission direct Xcel to file the proposals?
5. Should the Commission consider moving portions of the annual reliability report that are not required by Minn. Rules 7826 to Xcel's biennial Integrated Distribution Plan (IDP)? If so, should the Commission refer which pieces of information to move to the IDP to the workgroup to establish a proposal for updated distribution reporting data approved in Xcel Energy's 2023 IDP in Docket E002/M-23-452?

6. Are there any additional pieces of data to add to Xcel's Interactive Service Quality Map? When considering additional data points, please address:
  - a. Whether the data is already collected and easily available in a format that could be added to the map
  - b. If the data is something that is within Xcel Energy's control
  - c. The purpose the additional data would serve.
7. Should the Commission require Xcel to conduct any further analysis on disparities in reliability or disconnections? If so, what should the studies examine, and how often should they occur?
8. Should the Commission require Xcel to conduct any further analysis on disparities in reliability or disconnections? Is so, what should the studies examine, and how often should they occur?
9. Are there other issues or concerns related to this matter?

## II. DEPARTMENT ANALYSIS

The Department reviewed the Comments and Reply Comments provided by the 1) Citizens Utility Board/Energy Cents Coalition (Joint Commenters) as well as the Reply Comments provided by 2) Fresh Energy (FE); 3) Grid Equity Commenters (GEC), and; 4) Xcel Energy (Xcel or the Company).

Regarding the organization of these Comments, the Commission's Notice and the issue and the topics listed provide an outline for the Department's Comments.

- A. *IN ITS APRIL 1, 2024, ANNUAL REPORT ON SAFETY, RELIABILITY, AND SERVICE QUALITY (SRSQ) XCEL ENERGY IDENTIFIED ADDITIONAL IMMEDIATE STEPS IT CAN TAKE TO EXPAND OUTREACH PRIOR TO DISCONNECTION THAT DO NOT REQUIRE COMMISSION ACTION. ARE THERE OTHER STEPS THE COMMISSION SHOULD TAKE TO ADDRESS DISPARITIES IN DISCONNECTIONS?*

Yes, the Department recommends that the Commission approve one of the recommendations the Joint Commenters proposed: Order Xcel to file payment and disconnection practices and direct Xcel to share practices with customers.

Procedurally, the Department also supports the Joint Commenters recommendation that Xcel be required to submit a compliance filing on Company's current payment agreement and disconnection practices and any modifications.

The Joint Commenters, FE and GEC proposed an additional seven steps or actions the Commission could approve to address the apparent disparities in disconnections. Recommendations 2 through 8 in Table 1 provide those recommendations.<sup>1</sup> The Department will address each of those proposals either separately or in a combined review if two or more recommendations address the same topic.

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<sup>1</sup> See Attachment A.

*a. Weather-Driven New Disconnection Moratoriums and Reconnection of Disconnected Customers Requirement*

- i. Extreme heat disconnection moratorium and reconnection of disconnected customers*
- ii. Unhealthy air quality moratorium and reconnection of disconnected customers*

The Joint Commenters and GEC both supported these two recommendations. The Department supported the extreme heat disconnection moratorium in its initial Comments.

Xcel explained in Reply Comments that it had reached agreement with the Joint Commentors on the proposal for reconnecting customers during extreme heat events. The Company also stated it was negotiating with the Joint Commenters on Air Quality Event moratorium and reconnection of disconnected customers proposal as well.

The Department appreciates the Joint Commenters and Xcel's efforts regarding the extreme heat proposal. The Department recognizes the potential public health benefits associated with this proposal. The Department requests that Xcel provide; 1) a range of cost estimates as to the potential financial impacts of the adoption of a policy; and 2) an estimate of the public health benefits that the implementation of this policy could potentially produce. The Department also requests Xcel provide an estimate of the frequency of extreme heat events during May through September for a weather-normalized calendar year.

Regarding the unhealthy air quality moratorium and reconnection proposal, the Department has the same concerns as noted for the extreme heat proposal. As a result, the Department requests Xcel provide the following information:

- 1) a range of cost estimates as to the potential financial impacts of the adoption of a policy.
- 2) an estimate of the public health benefits implementation of this policy could potentially produce; and
- 3) an estimate of the frequency of unhealthy air quality events for a weather-normalized calendar year.

*b. Reduce Xcel's Down Payment Requirements and Modify Its Disconnection to Consider Individual Household Circumstances*

The Joint Commenters and Fresh Energy both supported this proposal.<sup>2,3</sup> In their Reply Comments, the Joint Commenters discussed Xcel's practice of requiring customers to submit a 50 percent down payment prior to entering into a payment agreement. Fresh Energy identified a similar concern in its Reply Comments. The Joint Commenters also identified an instance in which a customer was asked to pay more than \$1,000 to enter into a payment agreement. Further, the Joint Commenters also stated

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<sup>2</sup> Joint Commenters Reply Comments at p. 2, filed June 28, 2024.

<sup>3</sup> Fresh Energy Reply Comments at p. 3, filed June 28, 2024.

that Minn. Stat. 216B.098, Subd. 3, requires Xcel to consider both the customer's financial circumstances, as well as an extenuating circumstances of the household.

The Department appreciates the Joint Intervenors and FE's concerns about Xcel's payment agreements. When the Department read the phrase "individual household circumstances", it interpreted that phrase as being defined as each individual household's annual income.<sup>4</sup> If the Department's interpretation of that phrase is incorrect, the Department requests that the Joint Intervenors provide a definition of the term "individual household circumstances" as well as an example or two in its Reply Comments. The Department is particularly interested in whether the Joint Intervenors classify the term as primarily quantitative or qualitative.

If the Department's equating the phrase "individual household circumstances" with household income is correct, then the Department asks Xcel to provide some additional information in Reply Comments. Specifically, the Department asks that Xcel discuss: 1) whether it uses annual household income currently as part of its disconnection process and 2) how that use is consistent with the Commission's customer data privacy requirements, and 3) how the Company uses this information in the disconnection process.

The Department prefers to collect some additional information before developing a recommendation. If the Department can formulate a recommendation or recommendations, that information will be included in Supplemental Comments.

The Department notes that Xcel discussed the results of the Company's efforts in 2022 regarding agreeing to payment plans that had lower thresholds for customers willing to enter a payment plan in its initial filing in this docket.

As the pandemic wound down, some of those processes slowly reverted to normal business operations, including sending disconnection notices and completing service disconnections for non-payment. The last process to revert back was down payment requirements for arrangements. During the pandemic and shortly thereafter, customers could set arrangements for as low as two percent down with no restriction on the number of arrangements set. Unfortunately, this resulted in customers continuing to accrue higher past due balances, even while on payment arrangements, making it more difficult for customers to get caught up. This runs counter to the purpose of setting an arrangement, which is designed to help manage customer payments while bringing their account current. As a result, Xcel Energy continues to see past due balances grow, and in the event of disconnection, makes it harder for a customer to resume service due to the magnitude of the past due balance. The purpose for updated pay arrangement guidelines is to create a structure where customers can receive assistance in avoiding disconnection, while setting up the

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<sup>4</sup> Another potential definition would be the customer's current credit rating.

framework that helps bring their past due balance down in a manageable but meaningful way.<sup>5</sup> [Emphasis added.]

Also, in response to a Commission the following question included in the Notice of Comments regarding Xcel's Quality of Service tariff:

Has Xcel found that decreased payment plan thresholds encouraged repayment of past due bill?

The Company stated:

As payment plans can be set for up to a 12-month period, the Company does not yet have a clear answer as to the full impact of the decrease from 75 percent to 50 percent of the disconnection balance, since this change occurred less than 12 months ago. Evolving factors on repayment success can stem from customers' regular or irregular payment behavior, propensity to seek energy assistance, active outreach and customer assistance awareness campaigns, or a number of external factors that can only be surmised.

Generally speaking, our experience has shown that the lower the initial payment or the longer the payment plan, the less progress a customer makes towards successful payment plan completion. Both factors typically contribute to customers inability to complete a payment plan, resulting in an ongoing and increasing balance month-to-month.<sup>6</sup>[Emphasis added.]

These statements by Xcel suggest that the Company's efforts in this area have found that the benefits associated with lowering the initial payment plan percentage are limited. Consequently, the Department requests that Fresh Energy and the Joint Commenters provide additional information regarding the extent to which Xcel could lower its 50 percent initial payment threshold and still manage to lower a customer's accrued past due balances during the payment plan. The Department would also appreciate FE and the Joint Intervenors including any analytical support for the proposed lower initial payment thresholds in their Reply Comments as well.

- c. Institute a moratorium on remote shutoffs for customers in very low-income census blocks with high concentrations of people of color.*

Fresh Energy advanced this recommendation in its Reply Comments. FE also noted in those Reply Comments:

Customers in these areas may be navigating challenging circumstances, including working multiple jobs, while caring for children, and/or other relatives, and also being saddled with high energy bills due to living in older, less efficient housing. Fresh Energy is concerned about customers

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<sup>5</sup> See page 8 of the Company April 1, 2024, filing.

<sup>6</sup> Docket Nos. E,G002/CI-02-2034, and E,G002/M-12-383, Xcel Comments filed May 31, 2024, at page 6.

living in these circumstances, especially the impact on people of color given the disparities identified in the Pradham and Chan Study.

The Department notes that parameters included in Fresh Energy's recommendation is very similar to the parameters Xcel Energy used to develop its proposed new pilot program to provide an Automatic Bill Credit (ABC) on electricity bills within identified areas of high electric energy burden.<sup>7</sup> In that filing, the Company is proposing a two-year pilot program in which a bill credit to reduce the electric energy burden to 4 percent of the median-income household. The ABC would use Xcel's Minnesota Electric Service Quality Interactive Map to determine which census block group qualifies for this automatic bill credit.<sup>8</sup>

The Center for Energy and the Environment and Energy CENTS Coalition noted in their joint comments on the ABC proposal:

The roll-out of the Proposed Pilot Program is happening against the backdrop of a significant spike in disconnections across utilities and geographies. Xcel Energy included. Several of the Company's recent regulatory filings show that 2023 had the highest level of disconnections since 2014 <sup>[footnote omitted]</sup> In its 2023 Service Quality Report, Xcel Energy attributed the increase in disconnections to the lingering economic hardship coming out of the COVID-19 pandemic and consequently a persistently high-level of arrears among a subset of customers. <sup>[footnote omitted]</sup> It would be a missed opportunity if the Company were to engage in a pilot program that focuses on the financial well-being of customers in the lowest-income communities in its service territory and not place arrearage reduction at the center of its program design and ultimate evaluation.

Utility arrears can be a major cost factor for utility customers, particularly utility customers experiencing high energy burden. Customers who fall behind on utility bills are typically offered payment plans by the utility and some programs, including Xcel Energy's PowerOn program, forgive a portion of a customer's arrears if the customer adheres to a negotiated payment plan and schedule. The Joint Commenters believe it is important that the Company develop and offer a forgiveness process and opportunity, similar to that offered in the PowerOn program, for customers participating in the Proposed Pilot Program who have existing arrears. <sup>[footnote omitted]</sup>

Data and findings of the Proposed Pilot Program may be unclear or misleading for customers who are attempting to pay down arrears over the course of the Proposed Pilot Program. Energy burden includes costs

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<sup>7</sup> Docket No. E002/M-24-173, filed April 16, 2024.

<sup>8</sup> The Department notes that the Automatic Bill Credit docket is currently before the Commission.

customers pay toward previous utility debts, not just the costs customers pay toward their most recent utility bill. We fear that the Proposed Pilot Program bill credits will be less impactful for customers with arrears, as those customers are both attempting to pay current utility bills and previous utility debts. Providing a “clean slate” for participating customers would help to ensure that pilot program impacts on customers’ energy burden and ability to make utility payments over time are clear and identifiable.<sup>9</sup>

This passage highlights the connection between arrearages, disconnections, and the payment of ongoing bills. CEE and ECC’s reasoning, that disconnections and arrearages will influence the results of the ABC program is justified. Assuming there is significant overlap in the census block groups eligible for the ABC program and those that would be eligible for Fresh Energy’s proposed moratorium, implementation of the proposed moratorium on remote shutoffs for customers in very low-income census blocks with high concentrations of people of color would likely affect the data collected as part of the ABC pilot evaluation. Specifically, if customers in those census blocks cannot be disconnected during the two-year pilot program, this policy would likely affect their behavior. Given that Xcel is proposing to spend \$5.4 million annually (\$10.8 million total) on the ABC effort, any change that would lessen the usefulness of the information gathered from the Pilot Program should be considered in that context.

As a result, the Department requests Xcel provide an analysis that compares the census block groups eligible for the ABC program and the census block groups eligible for the proposed moratorium that FE is proposing. In addition, the Department requests that Xcel and Fresh Energy provide analyses that attempt to determine the extent of the potential impact of the proposed moratorium on the ABC program in their respective Reply Comments. The Department will review that information and determine whether a recommendation is warranted in its Supplemental Comments.

- d. Halt remote disconnections until Xcel has implemented a plan to address disparities and demonstrated remote shut-off doesn’t increase disparities.*

On this topic, the GEC’s stated in Reply Comments:

“The GEC’s also stress that this increase in disconnections – seemingly driven, at least in part, by remote disconnections – likely exacerbates the existing, significant racial disparity demonstrated in Xcel’s Energy Equity Analysis and by Drs. Chan and Pradham in prior analyses filed in other proceedings.<sup>[footnote omitted]</sup> . . . Given these ongoing and very concerning racial disparities in disconnections, the GECs recommend that the Commission consider halting remote disconnections until Xcel has implemented a plan to address those disparities and specifically has

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<sup>9</sup> Docket No. E002/M-24-173, CEE and ECC Joint Comments filed July 8, 2024, at pages 8 and 9.



demonstrated that remote disconnection does not increase the disparities.<sup>10</sup>

This proposal is similar in scope and intent to the Fresh Energy recommendation discussed in the previous section except that it specifically highlights the apparent racial disparities in disconnections. The Department notes it asked:

Xcel to include a discussion of how it could determine whether the higher level of disconnections in high percentage POC neighborhoods is due to the differential application of disconnection policies or to a difference in non-payment rates. The issue was the initial driver for this discussion and doesn't appear to have been explained adequately.<sup>11</sup>

Xcel noted the Department's request for information in its Reply Comments. The Company responded:

The Department also recommends the Commission approve our proposal to use targeted outreach to lower disconnection rates in the high percent POC neighborhoods and report on its efforts in the 2025 SRSQ Report or another docket if the Commission prefers. That targeted outreach proposal includes utilizing available tools such as the existing Service Quality Interactive Map and work with community-based organizations that help bring assistance directly to the neighborhoods we serve. Additionally, we can utilize our most successful outreach campaigns through social media platforms, telephone, email, and direct mail which will be developed and slotted to begin at least 30-45 days prior to the beginning of the upcoming LIHEAP season and will last throughout the 2024-2025 season.

The Company has started a pilot project focused on keeping our customers in the payment plans they set up. This initiative assists customers with past due balances over \$5,000 by removing one late payment charge with each payment made in their payment plan, up to six total.

The Company elected not to respond to the Department's question directly unfortunately. While the Department is also concerned about the apparent higher disconnection rates for People of Color, the absence of any determination by Xcel or any other party as to primary driver for those higher disconnection rates complicates the development of a policy response.<sup>12</sup> If Xcel has applied its disconnection policy differently between individuals historically, then the Company would be in violation of its tariff and some sort of regulatory response on the part of the Commission would be expected. If however, the difference in the disconnection rates is due to different non-payment rates

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<sup>10</sup> GEC Reply Comments at page 5.

<sup>11</sup> Department Comments filed June 28, 2024, at page 54.

<sup>12</sup> TRC, Xcel's consultant that prepared the Equity study noted: "Given the data available, we cannot distinguish between different non-payment rates and different disconnection policy application by Xcel Energy". Attachment Q, page 2 of the April 1, 2024, filing.

for different individuals, then that problem appears to the Department at least to fall outside the realm of economic regulation. Rather, that would be an instance of individual actors making decisions regarding their personal finances.

Given the ambiguity regarding the primary driver of the disparities in disconnection, combined with the potential effects on the evaluation of the ABC pilot discussed earlier, the Department cannot support this recommendation at this time. The Department requests that Xcel or the GEC's provide an analysis in Reply Comments that estimates the financial effects of the proposed moratorium on remote disconnections over a two-year period as that information may be useful to the Commission.

- e. Require Xcel to eliminate voicemail as a permissible form of final contact as a condition for extending Company's variance.*
- f. Disallow voicemails as a final means of communication prior to remote disconnection.*

The Department is combining its review of these two recommendations given their similarities, although the Department does recognize a procedural nuance between the two recommendations.

The Joint Commenters made the first recommendation in their Comments.<sup>13</sup> They also assumed that allowing Xcel to remotely disconnect customers and only requiring the Company to leave a voicemail as the final communication with the customer undermines Xcel's previous disconnection model which was based on a "disconnection as disconnection prevention" approach. The Joint Commenters also stated:

"The ability to disconnect service remotely is not the sole cause of increased disconnections, but it enables the Company to disconnect more customers at a faster rate with fewer opportunities for the customer to remedy the situation."

Before the Department addresses the Joint Commenters recommendation, the Department believes some additional context regarding Xcel's Advanced Metering Infrastructure (AMI) system might be of value. The Department notes that the Commission required additional AMI related reporting in the Company's Annual Service Quality Report for the reporting years of 2023, 2024, and 2025 in its Order dated March 22, 2023, in Docket No. E002/M-22-233 at Order Points 5 (A-L). Those reporting requirements included:

- A. Meter-related complaints for advanced metering infrastructure.
- B. The percentage of customers flagged for disconnection who pay their disconnection amount in full in the current process versus after the variance has been implemented.
- C. The number of field visits required when the Company is unable to reach the customer (speaking to the customer or leaving a voicemail).
- D. The length of time for reconnecting each customer, and the method for reconnecting the customer.

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<sup>13</sup> Joint Commenters Comments at page 5.

- E. Re-analysis of actual costs for disconnection/reconnection requiring in-person visits and those performed remotely.
- F. Detailed cost information and subsequent analysis of costs as opposed to the Company's proposed language stating adjustments to costs can be following the first year of reporting.
- G. Progress exploring texting capabilities for customer contact and progress on an automated process for reconnection.
- H. Progress adding a direct link on its website to submit the Medically Necessary Equipment & Emergency Certification Form.
- I. Feedback from the Department of Commerce, Energy Assistance Unit regarding remote disconnection.
- J. Compliance with all consumer protection measures ordered in this proceeding.
- K. Detailed information on the number of customers opting out of AMI meter installation and demand-billed customers compared to customers with AMI meters installed.
- L. A proposal for using the capacity of its advanced metering infrastructure to restore electric service to customers during periods of extreme heat.

The Company provided this information in the Annual Report.<sup>14</sup> The Department reviewed the information Xcel provided and notes:

- Between May 1, 2023, and December 31, 2023, the Company sent out 330,027 disconnection notices and 2,660 customers (0.81%) paid their past due balances.
- The Company placed 39,250 AMI disconnection orders in 2023. Xcel was able to reach 32,229 of those customers via telephone or voicemail and was unable to reach the remaining 7,021 customers. Those 7,021 customers who had received disconnection notices were supposed to be disconnected manually. The Company incorrectly remotely disconnected 1,161 AMI customers that had not received a field visit. Xcel then suspended customer disconnects until it had remedied that error.
- Remote reconnection required less than a minute on average. A manual disconnection visit required almost 30 minutes for a residential customer. The difference in time needed for reconnection for commercial customers was 65 minutes manually and still less than one minute remotely.
- The Company's remote-disconnect costs increased by 54 percent between 2022 and 2023. Those same costs for manual-disconnects increased 100 percent over the same period.

The information Xcel provided in response to this Commission reporting requirement suggests that remote disconnection is a far more efficient and cost-effective approach to disconnection for AMI customers than the historical method which requires a site visit. Commission approval of the Joint Commenters recommendation on remote disconnects would prevent the Company from utilizing one of the cost saving aspects of the AMI system. That decision would result in Xcel's costs and rates being higher than they otherwise would have been for all customers. The Department doesn't consider that to be a reasonable result.

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<sup>14</sup> Annual Report at pages 25 to 30.

Regarding the Joint Commenters' concern that allowing Xcel to use a voicemail as the final means of communication for a disconnection resulted in fewer opportunities for customers to react to Xcel's disconnection requests, the Department notes that Xcel provided a description of its disconnection policy in its Reply Comments.<sup>15</sup> The Company identified the following steps in its disconnection process.

1. Customers with past due bills are contacted regarding their past due status:
  - a. Each month in their monthly billing statement;
  - b. Emails, text messages and/or phone calls which generally are repeated for nine or more weeks before a disconnection notice is sent;
  - c. Disconnection notices are mailed via the United States Postal Service. For this to occur, the past due portion of a customer's bill must be at least \$180.
  - d. First call after receiving a disconnection notice;
  - e. Second calls after receiving a disconnection notice.

While the Department appreciates the Joint Commenters concerns regarding Xcel's current choice of a voicemail to notify AMI customers of a remote disconnection, the Department, after reviewing Xcel's disconnection process, concludes that customers receive an adequate number of opportunities to resolve their past due balance.

Xcel also provided information in Reply Comments suggesting the removal of the option of leaving a voicemail as the final communication for remote disconnections would disadvantage the Company in its efforts to get the customer to resolve the outstanding payment issue. The Company stated in its Reply Comments:

Our records indicate that customers simply do not answer their phones often when we call. Our 2024 data shows that, for our first call attempts, we were able only to speak to customers directly approximately 8 percent of the time. On the other hand, 77 percent of first calls to customers are left on a voicemail, and four percent of customers answered the door to a field agent. A customer can retrieve a voicemail either from their home or remotely and take steps to protect their account from disconnection. When comparing the effectiveness of a field representative visit to a first call, both yield similar results. Analyzing the data for 2022, the last full year the Company was required to perform field visits for all disconnections, customers answered the door 7.9 percent of the time. Reviewing 2024 year-to-date first call data shows customers answered that call 8.1 percent of the time. . . .

Recent data also reveals a declining trend in the percentage of customers that answer the door for field representative visits. This demonstrates that performing additional field visits would not be a more effective way to

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<sup>15</sup> Xcel Reply Comments at pages 5 and 6.

contact customers. . . . 2024 year-to-date data shows 96 percent of the time field representatives are unable to contact customers through this avenue.<sup>16</sup>

Given this information, the Department cannot support either of the recommendations requiring the elimination of voicemails as a final means of communication with the customer. At the same time, the Department recognizes that Xcel should attempt to contact the customer by at least one more form of electronic communication. Thus, the Department supports increasing the existing voicemail only requirement to one where the Company uses two methods of electronic communication to meet the threshold of final contact for disconnection. The other two electronic communication methods are text and email. If the Company leaves a voicemail and a text message or email in addition to that voicemail, then the Department would consider that a reasonable attempt to contact the customer.

***B. SHOULD THE COMMISSION CONSIDER COMBINING ANNUAL AFFORDABILITY REPORTS (FOR EXAMPLE POWERON) AS PART OF THE SRSQ REPORTS GOING FORWARD? IF SO, WHAT REPORTING COULD BE COMBINED?***

The Department supports increasing the efficiency related to service quality and service reliability reporting requirements. At the same time, the Department is reluctant to support moving information from one regulatory proceeding to another absent a clear and identifiable need. Consequently, the Department's recommends the Commission require Xcel to include a discussion of the costs and benefits resulting from combining the annual affordability reports and the SRSQ report in its April 1, 2025, Report. The Commission might also want to include a similar requirement in Minnesota Power's and Otter Tail Power's 2025 SRSQ reports as well.

***C. ARE THERE OTHER MATTERS RELATED TO AFFORDABILITY AND DISCONNECTIONS THAT SHOULD BE REPORTED OR CONSIDERED AS PART OF THE SRSQ REPORTS GOING FORWARD?***

Minnesota Power provided the following table that provides the overall average time to reconnect using MP's remote-reconnect program compared to the standard reconnection process.<sup>17</sup> The unit used in the table is DD/HH/MM/SS (Days, Hours, Minutes, Seconds).

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<sup>16</sup> Xcel Reply Comments submitted June 24, 2024, at pages 3-4.

<sup>17</sup> Minnesota Power Reply Comments submitted July 22, 2024, in Docket No. E015/M-24-29 at page 2.

**Table 1 - MP Average Time to Reconnect from Disconnect and Request for Standard and Remote Disconnection Methods**

Customer Group	Standard Disconnection	Remote Disconnections
<b>Average Time to Reconnect from Disconnect</b>		
LIHEAP	5 Days, 4:34:44	3 Days, 7:21:56
Self-Declare	5 Days, 5:15:35	4 Days, 1:14:57
Standard	22 Days, 6:6:31	9 Days, 3:52:29
All Customer Groups	17 Days, 12:48:44	6 Days, 22:23:8
<b>Average Time to Reconnect from Request</b>		
LIHEAP	0 Days, 4:14:56	0 Days, 0:0:53
Self-Declare	0 Days, 2:59:3	0 Days, 0:0:51
Standard	0 Days, 11:54:0	0 Days 0:9:57
All Customer Groups	0 Days, 9:44:40	0 Days, 0:6:28

The Department considers the table’s format and the information included to be a useful tool for presenting this information. The Department recommends the Commission direct Xcel to develop a similar table for its 2025 SRSQ Report.

*D. SHOULD THE COMMISSION DIRECT XCEL ENERGY TO FILE ITS PROPOSED ENHANCED VEGETATION MANAGEMENT PROPOSAL AND TARGETED UNDERGROUNDING PROPOSAL AS DESCRIBED IN ITS APRIL 1, 2024, ANNUAL REPORT ON SRSQ? IF SO, WHEN, AND WHERE SHOULD THE COMMISSION DIRECT XCEL TO FILE THE PROPOSALS?*

The Department notes that the Company filed the proposed enhanced vegetation management proposal and targeted undergrounding proposal in response to the Commission’s following reporting requirements included in Order Points 3 and 4 of the Commission’s May 18, 2023, Order in Docket Nos. E002/M-20-406 and E002/M-17-401. Order Point 3 directed Xcel to:

*Conduct an analysis that examines whether there is a relationship between poor performance on the five individual metrics displayed in the interactive map and equity indicators. Required Xcel to file this analysis with its next service quality report due April 1, 2024.*

Order Point 5 continued:

*If Xcel’s analysis determines there are disparities in any of the five metrics displayed on the map, require Xcel to identify preliminary steps it could take to rectify the disparities and if Commission approval is required, where and when it would expect to file solutions. This should include an analysis of whether modifications to Xcel’s Quality of Service Plan are necessary to address any identified disparities. Require Xcel to file this preliminary plan with its next service quality report due April 1, 2024.*

The Company filed a significant amount of information in its April 1, 2024, Report in compliance with these two reporting requirements.

Xcel retained a consultant to perform this analysis. TRC Companies (TRC or the Consultant) was the vendor selected. TRC's analysis refined a similar analysis performed by Dr. Gabriel Chan for the Just Solar Coalition which was filed in Xcel's 2021 electric general rate case (Docket No. E002/GR-21-630) surrebuttal testimony. Regarding the reliability metric, Customers Experiencing Lengthy Interruptions (CELI) the Consultant's analysis concluded:

The racial composition of a neighborhood does not have a strong relationship with outage duration, except among neighborhoods with old housing stock and high percent POC where the highest CELI rates are observed and CELI rates rise with percent POC.

For the Customers Experiencing Multiple Interruptions (CEMI) TRC's analysis concluded:

There is not a strong relationship between outage frequency and any of the explanatory variables we considered.

The Consultant identified four potential area for improvement, two of which are related to the reliability topic:

1. Revisit vegetation management practices in high percentage POC communities with older houses. TRC's analysis did find a correlation between long-duration outages and those factors.
2. Initiate a closer review of distribution equipment in those some high percentage POC communities with other houses. This could help to lower the number of long-duration outages in those communities.

Xcel then provided a discussion of potential improvements TRC's analysis identified. The Company found:

1. Regarding TRC's finding that there were longer duration outages in high POC percentage neighborhoods, especially North Minneapolis, South Minneapolis and surrounding downtown St. Paul. The Company noted that the data TRC reviewed only covered three years and that long duration outages usually occur where there is major storm damage. Xcel also noted that there had been two major storms, one in 2020 and one in 2021 that likely influenced the data the Consultant reviewed. The upshot of this discussion was CELI data for those three years may over-state the number of longer duration outages. [Emphasis added.]
2. In terms of enhanced vegetation management practices, the Company identified some potential improvement but did not propose any new programs or initiatives.
3. Relative to the issue of attempting a closer review of the existing distribution system in the areas of interest, Xcel suggested improving

reliability by undergrounding some of the existing distribution plant. The Company designated this as a targeted undergrounding plan and stated it would develop such a filing if the Commission expressed interest.

Five years of data would be a much better data set for evaluating the full set of the Company's system and customer characteristics. Given that the two proposals this question is referencing are both directly related to the CELI 12 reliability finding in the Equity Study, the Department takes the position that additional analysis is required before the Commission has a sufficiently robust analysis to determine if the Company's Enhanced Vegetation Management and Targeted Undergrounding proposals (and the associated costs) are warranted. The Department prefers a minimum of five years of data before initiating the analysis needed for the two proposals listed.

As a result, the Department recommends the Commission require Xcel to update its Interactive Map such that it includes an additional year of data and then re-visit TRC's reliability analysis with this larger data set in its Annual SRSQ Reports filed on April 1 in 2025 and 2026. Those analyses will help to determine if TRC's initial finding regarding the frequency of long duration outages in high POC neighborhoods changes and the extent to which the fourth and fifth years of data influences the various reliability metrics.

*E. SHOULD THE COMMISSION CONSIDER MOVING PORTIONS OF THE ANNUAL RELIABILITY REPORT THAT ARE NOT REQUIRED BY MINN. RULES 7826 TO XCEL'S BIENNIAL INTEGRATED DISTRIBUTION PLAN (IDP)? IF SO, SHOULD THE COMMISSION REFER WHICH PIECES OF INFORMATION TO MOVE TO THE IDP TO THE WORKGROUP TO ESTABLISH A PROPOSAL FOR UPDATED DISTRIBUTION REPORTING DATA APPROVED IN XCEL ENERGY'S 2023 IDP IN DOCKET E002/M-23-452?*

As noted previously, the Department is reluctant to support moving information from one regulatory proceeding to another absent a clear and identifiable need. The Department requests that the parties to this proceeding that support moving portions of the annual reliability report that are not required by Minn. Rules 7826 to Xcel's Biennial IDP provide an explanation of the need for and benefits resulting from this proposed change in Reply Comments. The Department will review that information and forward a recommendation in Supplemental Comments if it believes one is warranted.

*F. ARE THERE ANY ADDITIONAL PIECES OF DATA TO ADD TO XCEL'S INTERACTIVE SERVICE QUALITY MAP? WHEN CONSIDERING ADDITIONAL DATA POINTS, PLEASE ADDRESS:*

- A. WHETHER THE DATA IS ALREADY COLLECTED AND EASILY AVAILABLE IN A FORMAT THAT COULD BE ADDED TO THE MAP*
- B. IF THE DATA IS SOMETHING THAT IS WITHIN XCEL ENERGY'S CONTROL*
- C. THE PURPOSE THE ADDITIONAL DATA WOULD SERVE.*

The Department didn't identify any additional data that it would like to add to Xcel's Interactive Service Quality Map at this time.



- G. *SHOULD THE COMMISSION REQUIRE ANY OTHER REPORTING ON DATA RELATED TO THE DISPARITIES IDENTIFIED IN THE ANALYSES, FOR EXAMPLE, DATA POINT RECOMMENDED IN THE IDP OR IN PRIOR COMMENT PERIODS IN 24-27? IF SO, WHERE SHOULD THE REPORTING OCCUR?*

The Department didn't identify any additional data that it would like to see reported related to the disparities identified in the analyses. The Department would like Xcel to add two years of calendar year data to the existing three-year data set used to determine if there are disparities related to reliability metrics.

- H. *SHOULD THE COMMISSION REQUIRE XCEL TO CONDUCT ANY FURTHER ANALYSIS ON DISPARITIES IN RELIABILITY OR DISCONNECTIONS? IF SO, WHAT SHOULD THE STUDIES EXAMINE, AND HOW OFTEN SHOULD THEY OCCUR?*

Yes, the Commission should require Xcel to update its CELI-12 and CEMI-6 analyses with the calendar years 2024 and 2025 to provide a robust baseline for evaluating reliability metrics in the Equity Study. Those annual updates should be filed with the Company's April 1, 2025, and April 1, 2026, Reports. Regarding the disconnection topic, the Department did ask Xcel to determine an approach to answer the question of whether the higher level of disconnections in high percent POC neighborhoods is due to the differential application of disconnection policies or a difference in non-payment rates in its Comments.

The Department's review of the information in the Automatic Bill Credit filing suggested that there are several census blocks located outside the Twin Cities Metropolitan Area. The Department is interested in determining if the TRC study compared the service reliability in the census blocks in Xcel's service territory containing older housing stock in the Metro and in Outstate Minnesota. In the past, the Department has remarked on Xcel's reliability results in its non-Metro service territory. The Department would like to extend that comparison to non-Metro service territory for this topic.

Fresh Energy recommended that the study performed by Drs. Chan and Pradham at the University of Minnesota be redone in two years in its Reply Comments.<sup>18</sup> The Department supports Fresh Energy's recommendation.

- I. *ARE THERE OTHER ISSUES OR CONCERNS RELATED TO THIS MATTER?*

The Joint Commenters expressed concerns regarding discrepancies in Xcel emergency medical account reporting and asked the Company to provide uniform data across different reporting dockets moving forward. It is the Department's understanding that the Joint Commenters have received corrected information from Xcel for 2023 and that the number of medical account requests should be correct on a going forward basis. Discussions are still taking place regarding the historical information. The Department requests that Xcel submit an erratum in this proceeding if needed, to correct that historical information.

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<sup>18</sup> Fresh Energy Reply Comments at page .

The Department also notes that it is responsible for reporting on Xcel's efforts regarding Diversity, Equity, and Inclusion (DEI). Given that this Notice of Comments addressed Reliability and Equity, the Department thought this might be an appropriate proceeding to include this information. The Company's 2023 results for DEI are the following:

1. Third (out of seven) highest percentage of BIPOC employees in its Minnesota-based workforce.
2. Fifth highest percentage of women in its Minnesota-based workforce.
3. Fifth highest percentage of Company spending going to Female-owned enterprises.
4. Third highest percentage of Company spending going to Minority-owned enterprises.
5. Highest percentage of Company spending going to small businesses.
6. Highest percentage of Company spending going to Veteran-owned businesses.

This is the first year the Department has completed this report so there isn't much information to analyze. Hence, the Department did not attempt to analyze any utility's results for 2023. The Department simply is providing comparative information for the different categories.

### III. RECOMMENDATIONS

The Department organized its recommendations consistent with the list of topics the Commission included in the Notice of Comment:

1. *In its April 1, 2024, Annual Report on Safety, Reliability, and Service Quality (SRSQ) Xcel Energy identified additional immediate steps it can take to expand outreach prior to disconnection that do not require Commission action. Are there other steps the Commission should take to address disparities in disconnections?*

The Department recommends the Commission order Xcel to file payment and disconnection practices and direct Xcel to share practices with customers.

- i. Extreme heat disconnection moratorium and reconnection of disconnected customers*

The Department requests that Xcel provide the following information in its Reply Comments on this topic:

- 1) a range of cost estimates as to the potential financial impacts of the adoption of the policy;
- 2) an estimate of the public health benefits that the implementation of this policy could potentially produce; and
- 3) an estimate of the frequency of extreme heat events during for a weather-normalized calendar year.

*ii. Unhealthy air quality moratorium and reconnection of disconnected customers*

The Department also requests that Xcel provide the following information in its Reply Comments on this topic:

- 1) a range of cost estimates as to the potential financial impacts of the adoption of the policy;
- 2) an estimate of the public health benefits that the implementation of this policy could potentially produce; and
- 3) an estimate of the frequency of unhealthy air quality events during for a weather-normalized calendar year.

*iii. Reduce Xcel's down payment requirements and modify its disconnection to consider individual household circumstances.*

The Department requests that Xcel provide the following information in its Reply Comments on this topic:

- 1) whether it uses annual household income currently as part of its disconnection process;
- 2) how that use is consistent with the Commission's Customer Data Privacy Requirements; and
- 3) how the Company uses this information in the disconnection process.

The Department requests that Fresh Energy and the Joint Commenters provide additional information regarding the extent to which Xcel could lower its 50 percent initial payment threshold and still manage to lower a customer's accrued past due balances during the payment plan. The Department would also appreciate FE and the Joint Intervenors including any analytical support for the proposed lower initial payment thresholds in their Reply Comments as well.

*iv. Institute a moratorium on remote shutoffs for customers in very low-income census blocks with high concentrations of people of color.*

The Department requests:

- 1) Xcel provide an analysis that compares the census block groups eligible for the Automated Bill Credit program and the census block groups eligible for the proposed moratorium that Fresh Energy is proposing.
  - 2) Xcel and Fresh Energy provide analyses that attempt to determine the extent of the potential impact of the proposed moratorium on the Automatic Bill Credit program in their respective Reply Comments.
- v. Halt remote disconnections until Xcel has implemented a plan to address disparities and demonstrated remote shut-off doesn't increase disparities.*

The Department requests that Xcel or the GEC's provide an analysis in Reply Comments that estimates the financial effects of the proposed moratorium on remote disconnections over a two-year period.

- vi. *Require Xcel to eliminate voicemail as a permissible form of final contact as a condition for extending Company's variance.*
- vii. *Disallow voicemails as a final means of communication prior to remote disconnection.*

The Department recommends the Commission adopt a slightly different recommendation than the two referenced above. The Department recommends the Commission support increasing the existing voicemail-only requirement currently in place to one where the Company uses two methods of electronic communication to meet the threshold of final contact for disconnection. The other two electronic communication methods are text and email.

2. Should the Commission consider combining annual affordability reports (for example PowerOn) as part of the SRSQ reports going forward? If so, what reporting could be combined?

The Department's recommends the Commission require Xcel to include a discussion of the costs and benefits resulting from combining the annual affordability reports and the SRSQ report in its April 1, 2025, Report.

The Department requests that the parties that have identified a clear and identifiable need to combine the annual affordability reports in the SRSQ to provide their reasoning in their respective Reply Comments.

3. Are there other matters related to affordability and disconnections that should be reported or considered as part of the SRSQ reports going forward?

The Department recommends the Commission require Xcel to include a table that provides the overall average time to reconnect using its AMI system's remote-reconnect program compared to the standard reconnection process for the LIHEAP, Self-Declare, Standard and Total customer groups in its April 1, 2025, Report.

4. Should the Commission direct Xcel Energy to file its proposed Enhanced Vegetation Management Proposal and Targeted Undergrounding Proposal as described in its April 1, 2024, Annual Report on SRSQ? If so, when, and where should the Commission direct Xcel to file the proposals?

The Department recommends the Commission not require Xcel to Energy to file its proposed Enhanced Vegetation Management Proposal and Targeted Undergrounding Proposal. Rather the Department recommends the Commission require Xcel to update its Interactive Map such that it includes two additional years of data and then re-visit TRC's analysis annually with this larger data set in its Annual SRSQ Reports filed on April 1 in 2025 and 2026.

5. Should the Commission consider moving portions of the annual reliability report that are not required by Minn. Rules 7826 to Xcel's biennial Integrated Distribution Plan (IDP)? If so, should

*the Commission refer which pieces of information to move to the IDP to the workgroup to establish a proposal for updated distribution reporting data approved in Xcel Energy's 2023 IDP in Docket E002/M-23-452?*

The Department requests that the parties to this proceeding that support moving portions of the annual reliability report that are not required by Minn. Rules 7826 to Xcel's Biennial IDP provide an explanation of the need for and benefits resulting from this proposed change in Reply Comments.

6. *Are there any additional pieces of data to add to Xcel's Interactive Service Quality Map? When considering additional data points, please address:*
  - a. *Whether the data is already collected and easily available in a format that could be added to the map*
  - b. *If the data is something that is within Xcel Energy's control*
  - c. *The purpose the additional data would serve.*

The Department has no recommendation for this topic.

7. *Should the Commission require any other reporting on data related to the disparities identified in the analyses, for example, data point recommended in the IDP or in prior comment periods in 24-27? If so, where should the reporting occur?*

The Department didn't identify any additional data that it would like to see reported related to the disparities identified in the analyses. The Department would like Xcel to add two years of calendar year data to the existing three-year data set used to determine if there are disparities related to reliability metrics.

8. *Should the Commission require Xcel to conduct any further analysis on disparities in reliability or disconnections? If so, what should the studies examine, and how often should they occur?*

The Department recommends the Commission require Xcel to update its reliability analyses included in the Equity Study with two additional calendar years of data to provide a robust data set for determining those reliability metrics. Those annual updates should be filed with the Company's April 1, 2025, and April 1, 2026, Reports.

The Department also recommends the Commission approve Fresh Energy's recommendation that the study performed by Drs. Chan and Pradham at the University of Minnesota be redone in two years using five years of weather information in Xcel's April 1, 2026, Report.

9. *Are there other issues or concerns related to this matter?*

The Department requests Xcel submit an erratum in this proceeding if needed to correct the emergency medical accounts historical figures.

**Table 1 – Summary of Positions Regarding Disconnections and Disparities in Disconnections – (Y/N/NA designates whether Party supports recommendation, opposes, or has no opinion)**

Line No.	Recommendations	Parties				
		Xcel	CUB	Department	Fresh Energy	Grid Equity
1.	Xcel's improved out-reach proposal	Y	NA	Y	NA	NA
2.	Extreme heat disconnection moratorium and reconnection of disconnected customers	Y	Y	Moratorium Y, Reconnection – NA	NA	Y
3.	Unhealthy air quality moratorium and reconnection of disconnected customers	Under negotiation	Y	NA	NA	Y
4.	Reduce Xcel's down payment requirements and modify its disconnection to consider individual household circumstances	N	Y	NA	Y	NA
5.	Institute a moratorium on remote shutoffs for customers in very low-income census blocks with high concentrations of people of color	NA	NA	NA	Y	NA
6.	Halt remote disconnections until Xcel has implemented plan to address disparities and demonstrated remote shut-off doesn't increase disparities	NA	NA	NA	NA	Y

					<b>Parties</b>	
<b>Line No.</b>	<b>Recommendations</b>	<b>Xcel</b>	<b>CUB</b>	<b>Department</b>	<b>Fresh Energy</b>	<b>Grid Equity</b>
7.	Require Xcel to eliminate voicemail as a permissible form of final contact as a condition for extending Company's variance	N	(maybe Y)	NA	NA	Y
8.	Disallow voicemails as a final means of communication prior to remote disconnection	N	Y	NA	NA	(maybe Y)
9.	Order Xcel to file payment and disconnection practices and direct Xcel to share practices with customers	NA	Y	NA	NA	NA
10.	Require Xcel to submit compliance filing on Company's current payment agreement and disconnection practices and any modifications	NA	Y	NA	NA	NA

## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce**  
**Comments**

**Docket No. E002/M-24-27**

Dated this **27<sup>th</sup>** day of **August 2024**

**/s/Sharon Ferguson**



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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_24-27_Official
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