



414 Nicollet Mall
Minneapolis, MN 55401

October 3, 2025

—Via Electronic Filing—

Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: REPLY COMMENTS
IN THE MATTER OF NORTHERN STATES POWER COMPANY'S ANNUAL REPORT
ON NATURAL GAS SERVICE QUALITY FOR 2024
DOCKET NO. G002/M-25-31

Dear Ms. Bergman:

Northern States Power Company, doing business as Xcel Energy, submits these Reply Comments in response to the initial comments in the above-referenced docket from the Department of Commerce (Department). We thank the Department for the thorough review of the Company's 2024 Annual Report on Natural Gas Service Quality.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Jemar Lee at Jemar.w.lee@xcelenergy.com or contact me at 612-330-6255 or Nicholas.F.Martin@xcelenergy.com with questions regarding this filing.

Sincerely,

/s/

NICHOLAS MARTIN
DIRECTOR, STRATEGIC OUTREACH AND ADVOCACY

Enclosures
cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Audrey C. Partridge	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF NORTHERN STATES
POWER COMPANY’S ANNUAL REPORT
ON NATURAL GAS SERVICE QUALITY
FOR 2024

DOCKET NO. G002/M-25-31

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits these Reply Comments in response to the Department of Commerce’s September 23, 2025 Comments on the Company’s 2024 Annual Report on Natural Gas Service Quality. The Company appreciates the Department’s thorough review of our Annual Report. The Department ultimately recommends that the Commission accept the Company’s Annual Report, and requests clarification from the Company on just one item in the report.¹ We provide that clarification here. No other parties commented on the Annual Report.

I. COMMENTS

B.1 – Call Center Response Time

In its Comments, the Department presents data from the Annual Report on call center response time for 2015 through 2024, noting that the Company in 2024 did not meet the Minnesota Rules 7826.1200 Telephone Response Time requirement to answer 80 percent of calls during business hours within 20 seconds. In 2024, the Company answered 79.7 percent of calls within 20 seconds.² The Department

¹ September 23, 2025 COMMENTS of the Minnesota Department of Commerce on Xcel Energy’s Annual Report on Natural Gas Service Quality (2024 SRSQ Report or Annual Report) for 2024. Docket No. G-002/M-25-31. Page 19.

² Department comments, Table 1 on page 3.

requested that the Company clarify in Reply Comments its plans to meet the call center response time requirement in the future.

The Company also addressed this question in our Quality of Service Plan (QSP) Annual Report for 2024,³ and in our response to Department of Commerce Information Request No. 15 on our Electric Safety, Reliability and Service Quality Annual Report for 2024.⁴

Staffing challenges and severe weather events were the main drivers of lower Telephone Response Time performance in 2024. Staffing issues were largely caused by a challenging hiring market and recruiting efforts falling short, resulting in new hire classes that were not as full as we were targeting. As short staffing occurred, the remaining agents became busier, resulting in longer calls and higher attrition levels. This compounded the staffing shortages throughout the year. In addition to the staffing challenges, severe weather events in July and August of 2024 contributed to higher call volumes and lower performance during those months, bringing down our overall average for the year.

In response, the Company made several changes to increase staffing levels and restore our ability to meet the Telephone Response Time standard of 80 percent of calls answered in 20 seconds or less. Those changes include:

- Enhanced our job advertising to attract more candidates.
- Made updates to the Contact Center job description for clearer understanding of job expectations and responsibilities.
- Proactively reached out to applicants through our Xcel Energy Recruiting Team to help answer any position-related questions.
- Increased starting wage from \$18 to \$20 per hour in our Wisconsin call center to better align with geographical pay standards and ensure our compensation remains competitive.

We have seen positive impacts to those changes and are currently exceeding our target service level requirements in 2025. With our comprehensive staffing plan, call forecasting, and continued recruitment efforts, we are positioned favorably to continue to provide quality service and respond in a timely manner that meets both customer and regulatory expectations.

³ Northern States Power Company, doing business as Xcel Energy. 2024 ANNUAL REPORT - QUALITY OF SERVICE PLAN (QSP) TARIFF. Docket Nos. E,G002/CI-02-2034 and E,G002/M-12-383. Page 5.

⁴ Company response to Department of Commerce Information Request No. 15 in Docket No. E002/M-25-27.

In addition, the Company proposed in our QSP Annual Report for 2024 to use 50 percent of the Telephone Response Time underperformance payment to accelerate deployment of a Live Chat function for customer assistance. Live Chat has been piloted already, with positive results for customer satisfaction and first call/contact resolution. Using a portion of the Telephone Response Time underperformance payment would allow the Company to accelerate full deployment and increase the number of agents using Live Chat, which we believe would enhance customer experience, reduce the volume of calls that need to be handled by a live agent, and contribute to improved performance on Telephone Response Time.⁵ The Commission's decision on this proposal remains pending.

CONCLUSION

Xcel Energy respectfully submits our reply comments to the Department's Comments to our 2024 Annual Gas Service Quality Report.

Dated: October 3, 2025

Northern States Power Company

⁵ QSP Annual Report for 2024, pages 9-10.

CERTIFICATE OF SERVICE

I, Victor Barreiro, hereby certify that I have on this day served copies of the foregoing document on the attached list of persons.

by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

electronic filing

DOCKET NO. G002/M-25-31

Dated this 3rd day of October 2025

/s/

Victor Barreiro
Regulatory Administrator

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		Yes	M-25-31
2	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-31
3	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-31
4	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO, 63119-2044 United States	Electronic Service		No	M-25-31
5	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-31
6	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	M-25-31
7	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	M-25-31
8	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	M-25-31
9	Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	M-25-31
10	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	M-25-31
11	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-31
12	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-31
13	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington	Electronic Service		No	M-25-31

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14	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07- MCA Minneapolis MN, 55401 United States	Electronic Service		Yes	M-25-31
15	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	M-25-31
16	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-31
17	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-31
18	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	M-25-31