division of energy resources
Minnesota Department of Commerce

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July 31, 2013

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E017/M-13-253

Dear Dr. Haar:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

> Otter Tail Power Company's 2012 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI and CAIDI Reliability Standards for 2013.

The petition was filed on April 1, 2013 by:

> Jessica Fyhrie
> Tariff Specialist
> Tariff Application and Compliance
> Otter Tail Power Company
> 215 South Cascade Street
> PO Box 496
> Fergus Falls, Minnesota 56538-0496

The Department recommends that the Commission **accept** the Petition and set 2013 SAIFI, SAIDI and CAIDI goals as proposed by Otter Tail Power Company.

Sincerely,

/s/ ANGELA BYRNE
Financial Analyst
651-539-1820

AB/jl
Attachment

division of energy resources
Minnesota Department of Commerce

# BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

# COMMENTS OF THE MINNESOTA DEPARTMENT OF COMMERCE DIVISION OF ENERGY RESOURCES

DOCKET NO. E017/M-13-253

## I. BACKGROUND

Minnesota Rules, Chapter 7826 (effective January 28, 2003) were developed as a means for the Minnesota Public Utilities Commission (Commission) to establish safety, reliability, and service quality standards for utilities "engaged in the retail distribution of electric service to the public" and to monitor their performance as measured against those standards. There are three main annual reporting requirements set forth in the rule. These are:

(1) the annual safety report (Minnesota Rules, part 7826.0400),

(2) the annual reliability report (Minnesota Rules, parts 7826.0500, subp. 1 and 7826.0600, subp. 1), and

(3) the annual service quality report (Minnesota Rules, part 7826.1300).

In addition to the rule requirements, the Commission's December 20, 2012 Order in Docket No. E017/M-12-325 directed Otter Tail Power Company (OTP or the Company) to:

1. Within 45 days of the date of the order, file a full action plan as required by Minnesota Rules 7826.0500, subpt. 1(E).

2. Include in its next filing a description of the policies, procedures and actions the Company has implemented, and plans to implement, to ensure reliability, including information demonstrating proactive management of the system as a whole, increased reliability and active contingency planning.

3. Include in its next filing a summary table that allows the reader to more easily assess the overall reliability of the system and identify the main factors that affect reliability.

4. Include in its next filing a comparison of the results of using the IEEE 2.5 beta method and its former method of storm normalization.

5. Include in its next filing a report on the major causes of outages for major event days.

On April 1, 2013, OTP filed a petition (2013 Annual Report) to comply with the Commission's December 20, 2012 Order and the requirements of Minnesota Rules Chapter 7826.

The Department notes that the Commission's June 5, 2009 Order in Docket No. E999/CI-08-948 (08-948 Docket) contains the following order point:

> Beginning on April 1, 2010 and annually thereafter, utilities shall file reports on past, current, and planned smart grid projects, with a description of those projects, including: total costs, cost effectiveness, improved reliability, security, system performance, and societal benefit, with their electric service quality reports.

On May 4, 2010, the Commission issued a "Notice Seeking Comments" in the 08-948 Docket requesting comments on issues relating to that docket, including the annual reports filed in compliance with its June 5, 2009 Order. Therefore, the Department concluded that the 08-948 Docket was the appropriate forum for comments on the utilities' annual smart grid project reports and did not address those reports in our comments relating to the utilities' 2010 Safety, Reliability, and Service Quality Reports. On March 4, 2011, the Commission issued its "Notice Clarifying Information Sought in Smart Grid Reports" in the 08-948 Docket. The Commission directed rate-regulated utilities to file their smart grid reports in both their annual Safety, Reliability, and Service Quality Report and in the 08-948 Docket. No request for comments has been issued to date on the 2013 smart grid reports; therefore, the Department will include a summary OTP's smart grid report as filed in its 2013 Annual Report.

## II. SUMMARY OF REPORT AND DEPARTMENT ANALYSIS

The Department reviewed OTP's 2013 Annual Report to assess compliance with Minnesota Rules, Chapter 7826 and the Commission's December 20, 2012 Order. The Department used information from past annual reports to facilitate identification of issues and trends regarding OTP's performance.

*A. ANNUAL SAFETY REPORT*

The annual safety report consists of two parts:

A. a summary of all reports filed with the United States Occupational Safety and Health Administration (OSHA) and the Occupational Safety and Health Division of the Minnesota Department of Labor and Industry (OSHD) during the calendar year; and

B. a description of all incidents during the calendar year in which an injury requiring medical attention or property damage resulting in compensation occurred as a result of downed wires or other electrical system failures and all remedial action taken as a result of any injuries or property damage described.

OTP provided a table summarizing the reports it filed with OSHA and the Minnesota Department of Labor and Industry during 2012.

In each report since the inception of Minnesota Rules, Chapter 7826 reporting requirements, OTP has reported that no incidents in which an injury requiring medical attention occurred. The following table summarizes OTP's most recent and past reports regarding property damage claims.

**Table 1: Property Damage Claims**

| | **Claims** | **Cause** | **Total Amount Paid** |
|---|---|---|---|
| 2003 | 11 | various | information not provided |
| 2004 | 3 | failed/damaged cable | information not provided |
| 2005 | 1 | failed insulator | information not provided |
| 2006 | 4 | faulty cable | information not provided |
| 2007 | 1 | low clearance | $1,203.63 |
| 2008 | 3 | equipment failure (2)<br>pole fire/tree (1) | $6,560.59 |
| 2009 | 4 | truck pulled line down (2)<br>underground cable failure<br>overhead wire failure | $7,058.34 |
| 2010 | 1 | Farm implement pulled overhead service down | $220.00 |
| 2011 | 0 | N/A | N/A |
| 2012 | 0 | N/A | N/A |

The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules, part 7826.0400.

## *B. ANNUAL RELIABILITY REPORT*

Minnesota Rules, part 7826.0500 requires each utility to file an annual report that includes the following information:

1. reliability performance,
2. storm-normalization method,
3. action plan for remedying any failure to comply with the reliability standards,
4. bulk power supply interruptions,
5. major service interruptions,
6. circuit interruption data (identify worst performing circuit),
7. known instances in which nominal electric service voltages did not meet American National Standards Institute (ANSI) standards,
8. work center staffing levels, and
9. any other relevant information.

### *1. Reliability Performance*

OTP's assigned service territory consists of six work centers. The following table shows the Company's 2012 reliability performance compared with the goals set by the Commission in Docket No. E017/M-12-325.[1]

[1] For ease of reference, the Department attaches to these comments Minnesota Rules chapter 7826. Minnesota Rules, part 7826.0200 defines SAIDI, SAIFI and CAIDI. The Department notes that SAIDI = SAIFI * CAIDI.

**Table 2: OTP's 2012 Reliability Performance Compared with Goals**

| Work Center | | 2012 Performance | 2012 Goals |
|---|---|---|---|
| Bemidji | SAIDI | 108.81 | 58.74 |
| | SAIFI | 1.12 | 1.16 |
| | CAIDI | 96.78 | 50.64 |
| Crookston | SAIDI | 139.89 | 48.58 |
| | SAIFI | 2.24 | 0.93 |
| | CAIDI | 62.36 | 52.24 |
| Fergus Falls | SAIDI | 55.05 | 69.16 |
| | SAIFI | 1.12 | 1.17 |
| | CAIDI | 49.08 | 59.11 |
| Milbank | SAIDI | 81.25 | 59.24 |
| | SAIFI | 1.26 | 1.57 |
| | CAIDI | 64.65 | 37.73 |
| Morris | SAIDI | 67.12 | 55.71 |
| | SAIFI | 1.03 | 1.12 |
| | CAIDI | 65.38 | 49.74 |
| Wahpeton | SAIDI | 34.41 | 57.00 |
| | SAIFI | 1.05 | 1.15 |
| | CAIDI | 32.64 | 49.57 |

The shaded cells in Table 2 indicate reliability goals that were not met in 2012. See Section II.B.3 below for a discussion of OTP's 2012 reliability performance.

The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. 1A, B, and C.

*2. Storm-Normalization Method*

OTP calculated its 2012 SAIDI, SAIFI, and CAIDI indices using the IEEE 2.5 beta method for storm normalization. The Company noted that results using the IEEE 2.5 beta method were different in the Bemidji and Fergus Falls customer service centers (CSCs) compared to the results using OTP's former method of storm normalization (i.e., eliminating interruptions to feeders that exceeded 24 continuous hours when caused by weather). The resulting indices were not appreciably different, with the exception of the Brainerd work center in which the former method resulted in much higher (worse) results. OTP reported that under the IEEE 2.5 beta method, one storm on July 2, 2012 met the criteria to be excluded as a major event day.

The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. 1D.

*3. Action Plan to Improve Reliability*

OTP provided detailed information regarding its failure to meet half of its 2012 reliability goals. The Company missed goals in four of its six work centers, or customer service centers (CSCs), three of which were hit with severe or extreme weather conditions. Specifically, OTP's Crookston CSC received 15 inches of wet, heavy snow only two days after the area was impacted by wildfires. The Bemidji and Morris CSCs suffered damage as a result of high winds, which knocked down trees, distribution lines, and transmission poles. Finally, in the Millbank CSC, a car struck and knocked down a pole causing two feeder interruptions. In all cases, OTP stated that the outages that were caused by these events were outside of the control of the Company.

Regarding the Morris CSC, OTP reported,

> Like other areas in Otter Tail's system, during 2012 the Morris CSC was hit by very extreme storm systems with very high winds, rain and lightning. Otter Tail has completed repairs and rebuilding of several structures within the Morris CSC. The current snow conditions have slowed down the line inspection and investigation process in this area. As the snow continues to melt, access to lines will improve and allow for faster investigation and identification of problems that may need to be addressed. At this time we have not been able to identify actions that may need to be taken to improve reliability performance in the Morris CSC.

The Department requests that the Company provide an update on the Morris CSC and what, if any, actions have been identified or taken to improve reliability in this CSC.

The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. 1E.

*4. Bulk Power Supply Interruptions*

OTP reported that it did not have any sustained interruptions to a Minnesota bulk power supply facility for the 2012 calendar year.

The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. 1F.

*5. Major Service Interruptions*

OTP provided copies of each report it filed under Minnesota Rules, part 7826.0700. The Company reported ten major service interruptions in 2012, of which the longest interruption lasted approximately 24 hours caused by the storm on July 2, 2012. Other causes for major service interruptions included equipment failure, public damage, animal contact, and additional storms.

The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. 1G.

*6. Worst Performing Circuit*

OTP identified the worst performing feeder in each work center, including its SAIDI, SAIFI and CAIDI, the major causes of each feeder's outages, and the remedial measures planned or taken by the Company.

The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. 1H.

*7. Compliance with ANSI Voltage Standards*

OTP provided a table listing the feeders and number of known occurrences where the voltage fell outside the ANSI voltage range B in 2012. OTP noted that all of the feeders with numerous occurrences were feeders serving a single large customer with a very large load (mostly pipelines). The Department observes no significant trend regarding this metric.

The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. 1I.

*8. Work Center Staffing Levels*

OTP provided information on staffing levels by work center as of December 31, 2012. The following table summarizes total staffing levels over the past ten years.

**Table 3: OTP Work Center Staffing Levels**

| | Field | Office | Total |
|---|---|---|---|
| 2003 | 128 | 42 | 170 |
| 2004 | 116 | 41 | 157 |
| 2005 | 111 | 34 | 145 |
| 2006 | 112 | 34 | 146 |
| 2007 | 110 | 37 | 147 |
| 2008 | 113 | 39 | 152 |
| 2009 | 110 | 38 | 148 |
| 2010 | 109 | 35 | 144 |
| 2011 | 103 | 32 | 135 |
| 2012 | 107 | 33 | 140 |

OTP reported that eight "delivery maintenance" field staff (not included in Table 3) work in substations and can be dispatched to do switching and other work during trouble.

The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. 1J.

*9. Other Information*

This section of OTP's 2013 Annual Report provided updates on continuing developments from the Company's use of the Interruption Monitoring System (IMS). Specifically OTP reported that:

- it will continue to investigate the integration of its real time IMS data into its Geographic Information System (GIS);
- its IMS continues to provide optimized and focused deployment of vegetation management resources to specific areas that are identified by the outage data collected within the IMS; and
- it continues to explore ways to assess reliability performance, including using the Customers Experiencing Multiple Interruptions ($CEMI_n$) index where n = 5 interruptions.

The Department appreciates OTP's efforts and thorough reporting and acknowledges OTP's fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. 1K.

*C. PROPOSED RELIABILITY STANDARDS FOR 2013*

OTP proposed the following reliability goals for 2013:

**Table 4: OTP's Proposed 2013 Goals**

| Work Center | SAIDI | SAIFI | CAIDI |
|---|---|---|---|
| All MN Customers | 64.95 | 1.13 | 57.48 |
| Bemidji | 70.64 | 1.26 | 56.06 |
| Crookston | 69.33 | 1.19 | 58.26 |
| Fergus Falls | 66.97 | 1.11 | 60.33 |
| Milbank | 75.49 | 1.82 | 41.48 |
| Morris | 55.78 | 1.01 | 55.23 |
| Wahpeton | 57.24 | 1.13 | 50.65 |

OTP stated that it based its proposed goals on a 5-year (2008 – 2012) average for SAIDI and SAIFI, with CAIDI calculated from those averages.

In the past, the Commission has typically set reliability goals at the 5-year average. Given the extent to which OTP missed its reliability goals since 2010, the Department took a closer look at whether an alternative goal-setting approach would be reasonable. Table 5 below shows how many of its eighteen annual goals[2] OTP has met since 2006.

[2] The eighteen goals are SAIDI, SAIFI, and CAIDI for all six of the Company's CSCs.

**Table 5: OTP's Reliability Goals Met[3]**

| | | 2006 | 2007 | 2008 | 2009 | 2010 | 2011 | 2012 |
|---|---|---|---|---|---|---|---|---|
| **Bemidji** | SAIDI | 70.00 | 68.00 | 40.42 | 48.25 | 47.85 | 50.65 | 58.74 |
| | SAIFI | 1.25 | 1.25 | 0.76 | 0.90 | 1.08 | 1.11 | 1.16 |
| | CAIDI | 56.00 | 54.00 | 53.18 | 53.61 | 44.31 | 45.74 | 50.64 |
| **Crookston** | SAIDI | 80.00 | 80.00 | 83.38 | 72.55 | 46.15 | 46.12 | 48.58 |
| | SAIFI | 1.55 | 1.55 | 1.71 | 1.48 | 1.08 | 1.05 | 0.93 |
| | CAIDI | 52.00 | 52.00 | 48.76 | 49.02 | 44.31 | 43.87 | 52.24 |
| **Fergus Falls** | SAIDI | 80.00 | 78.00 | 78.48 | 74.00 | 58.03 | 64.63 | 69.16 |
| | SAIFI | 1.35 | 1.35 | 1.40 | 1.27 | 1.09 | 1.15 | 1.17 |
| | CAIDI | 59.30 | 58.00 | 56.06 | 58.27 | 53.00 | 56.21 | 59.11 |
| **Milbank** | SAIDI | 115.00 | 66.10 | 66.64 | 74.00 | 80.00 | 47.97 | 59.24 |
| | SAIFI | 2.10 | 1.55 | 1.43 | 1.30 | 3.00 | 1.35 | 1.57 |
| | CAIDI | 55.00 | 42.65 | 46.60 | 56.92 | 26.67 | 35.57 | 37.73 |
| **Morris** | SAIDI | 90.00 | 80.00 | 74.82 | 67.05 | 46.62 | 47.84 | 55.71 |
| | SAIFI | 1.55 | 1.55 | 1.48 | 1.34 | 1.10 | 1.13 | 1.12 |
| | CAIDI | 58.00 | 52.00 | 50.55 | 50.04 | 42.47 | 42.26 | 49.74 |
| **Wahpeton** | SAIDI | 90.00 | 66.10 | 66.64 | 74.00 | 28.91 | 44.92 | 57.00 |
| | SAIFI | 1.55 | 1.25 | 1.43 | 1.30 | 0.43 | 0.84 | 1.15 |
| | CAIDI | 58.00 | 52.88 | 46.60 | 56.92 | 67.07 | 53.42 | 49.57 |

The above table illustrates a couple of important points. First, OTP did not have trouble meeting the majority of its goals until 2010. In fact, most of the Company's goals were generally trending downward (becoming harder to achieve) until 2010. Second, this table shows slight improvement in 2012 performance over 2010 and 2011. In 2012, OTP met nine out of eighteen of its goals, or 50 percent, including all of its goals in the Fergus Falls and Wahpeton CSCs.

Further, the Department compared the Company's 2012 performance with its 2012 goals and 2013 proposed goals in the four CSCs where OTP did not achieve all of its goals.

[3] Goals highlighted in orange indicate that OTP did not meet its performance goal.

**Table 6: Reliability Comparison**

| Work Center | SAIDI | SAIFI | CAIDI |
|---|---|---|---|
| **Bemidji** | | | |
| 2012 Goal | 58.74 | 1.16 | 50.64 |
| 2012 Performance | 108.81 | 1.12 | 96.78 |
| 2013 Proposed Goal | 70.64 | 1.26 | 56.06 |
| **Crookston** | | | |
| 2012 Goal | 48.58 | 0.93 | 52.24 |
| 2012 Performance | 139.89 | 2.24 | 62.45 |
| 2013 Proposed Goal | 69.33 | 1.19 | 58.26 |
| **Milbank** | | | |
| 2012 Goal | 59.24 | 1.57 | 37.73 |
| 2012 Performance | 81.25 | 1.26 | 64.65 |
| 2013 Proposed Goal | 75.49 | 1.82 | 41.48 |
| **Morris** | | | |
| 2012 Goal | 55.71 | 1.12 | 49.74 |
| 2012 Performance | 67.12 | 1.03 | 65.38 |
| 2013 Proposed Goal | 55.78 | 1.01 | 55.23 |

While OTP's proposed 2013 goals are generally higher (easier to achieve) than 2012 goals, the proposed goals would still exert pressure on the Company to perform better than it did in 2012. Since a trend of generally declining performance has not emerged as of yet, it is reasonable to continue to set reliability goals based on the five-year average for all of OTP's work centers. The Department recommends that the Commission approve the 2013 reliability goals proposed by OTP.

The Department will continue to carefully assess whether a declining trend in reliability performance develops. If OTP's 2013 performance is similar to 2010 or 2011 levels, the Department may consider recommending that the Company's goals be frozen at 2013 levels until performance improves.

*D. ANNUAL SERVICE QUALITY REPORT*

Minnesota Rules, part 7826.1300 requires each utility to file the following information:

1. Meter Reading Performance (7826.1400),
2. Involuntary Disconnection (7826.1500),
3. Service Extension Response Time (7826.1600),
4. Call Center Response Time (7826.1700),
5. Emergency Medical Accounts (7826.1800),
6. Customer Deposits (7826.1900), and
7. Customer Complaints (7826.2000).

*1. Meter Reading Performance*

The following information is required for reporting on meter reading performance by customer class:

A. the number and percentage of customer meters read by utility personnel;
B. the number and percentage of customer meters self-read by customers;
C. the number and percentage of customer meters that have not been read by utility personnel for periods of 6 to 12 months and for periods of longer than 12 months, and an explanation as to why they have not been read; and
D. data on monthly meter reading staffing levels by work center or geographical area.

OTP provided detailed meter reading information, including information on its monthly meter reading staffing levels. Table 7 summarizes OTP's meter reading statistics.

**Table 7: OTP Meter-Reading Performance**

| | Percent Read by OTP | Percent Read by Customer | Percent Not Read |
|---|---|---|---|
| 2005 | 92.2% | 2.8% | 5.0% |
| 2006 | 92.9% | 2.5% | 4.6% |
| 2007 | 93.4% | 2.8% | 3.9% |
| 2008 | 93.8% | 2.7% | 3.5% |
| 2009 | 94.1% | 2.4% | 3.5% |
| 2010[4] | 94.4% | 2.6% | 3.0% |
| 2011[5] | 95.1% | 2.6% | 2.3% |
| 2012 | 95.9% | 2.1% | 2.0% |

The Department notes that OTP has continually improved its meter-reading performance. Minnesota Rules, part 7826.0900, subp. 1 requires that at least 90 percent of all meters during the months of April through November and at least 80 percent of all meters during the months of December through March are read monthly. The Company's information reflects that it read at least 95 percent of all meters each month during 2012.

According to OTP, three meters were not read for 6-12 months, but there were no meters that were not read for a time period of greater than 12 months during 2012.

[4] Percentages in 2010 and 2011 were originally reported erroneously with estimated meter reads classified as company-read meters. In its August 6, 2012 Reply Comments in Docket No. E017/M-12-325, the Company corrected its meter reading data by categorizing estimated meter reads (meters that were not actually read by the Company or the customer) separately. For comparability, this updated data is reflected for 2010 and 2011 in the table above.
[5] *Id.*

The Company reported that it maintained an average of approximately 69 service representatives available for meter-reading during 2012. OTP also uses third parties to read meters in select cities within the Company's service territory.

The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules, part 7826.1400.

*2. Involuntary Disconnections*

The following information is required for reporting on involuntary disconnection of service by customer class and calendar month:

A. the number of customers who received disconnection notices,
B. the number of customers who sought cold weather rule protection under Chapter 7820 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.

OTP reported that 44,962 disconnection notices were sent to residential, small commercial, and large commercial customers in 2012. The following table summarizes residential customer disconnection statistics reported by OTP in its annual reports.

**Table 8: Residential Customer Involuntary Disconnection Information**

| | Received Disconnect Notice | Sought CWR Protection | Granted CWR Protection | % Granted | Disconnected Involuntarily | Restored within 24 Hours | Restored by Entering Payment Plan |
|---|---|---|---|---|---|---|---|
| 2004 | 31,043 | 302 | 260 | 86% | 679 | 201 | 22 |
| 2005 | 33,274 | 302 | 260 | 86% | 1,008 | 351 | 22 |
| 2006 | 37,980 | 388 | 291 | 75% | 873 | 295 | 54 |
| 2007 | 39,022 | 671 | 573 | 85% | 1,293 | 416 | 61 |
| 2008 | 41,764 | 1,062 | 970 | 91% | 973 | 289 | 28 |
| 2009 | 36,976 | 1,139 | 1,139 | 100% | 1,069 | 432 | 40 |
| 2010 | 38,119 | 1,837 | 1,837 | 100% | 1,122 | 428 | 44 |
| 2011 | 38,723 | 2,118 | 2,118 | 100% | 1,168 | 506 | 38 |
| 2012 | 39,912 | 2,139 | 2,137 | 99.9% | 745 | 558 | 29 |

The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules, part 7826.1500.

*3. Service Extension Requests*

The following information is required for reporting on service extension request response times by customer class and calendar month:

A. the number of customers requesting service to a location not previously served by the utility and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service; and

B. the number of customers requesting service to a location previously served by the utility, but not served at the time of the request, and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service.

OTP reported the number of service extension requests received each month by customer class. In 2012, 342 customers requested service to a location not previously served. All of these customers were connected on time. As for locations previously served, OTP reported that 2,199 of these requests were made; all but three of these requests were connected by the date requested.

The Department acknowledges that OTP has fulfilled the requirements of Minnesota Rules, part 7826.1600.

*4. Call Center Response Time*

The annual service quality report must include a detailed report on monthly call center response times, including calls to the business office and calls regarding service interruptions. Further, Minnesota Rules, part 7826.1200 requires that 80 percent of calls be answered within 20 seconds.

OTP provided monthly data regarding the number of incoming calls and those calls that were answered and abandoned. The Company's data indicates that an annual average of 85.95 percent of calls were answered within 20 seconds in 2012. Therefore, the Department concludes that OTP is in compliance with Minnesota Rules, part 7826.1200.

*5. Emergency Medical Accounts*

The reporting on emergency medical accounts must include the number of customers who requested emergency medical account status under Minnesota Statutes, section 216B.098, subd. 5, the number of applications granted, the number of applications denied, and the reasons for each denial.

OTP reported that 20 new Minnesota customers requested emergency medical account status in 2012, all of whom were granted that status.

The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules, part 7826.1800.

*6. Customer Deposits*

The reporting on customer deposits must include the number of customers who were required to make a deposit as a condition of receiving service.

Table 9 summarizes the number of customer deposits required over the past nine years. The number of customers served by OTP is provided for context.[6]

**Table 9: Customer Deposits Required**

| | Number of Deposits Required | Total Customers Served |
|---|---|---|
| 2004 | 315 | 57,585 |
| 2005 | 417 | 58,516 |
| 2006 | 395 | 58,841 |
| 2007 | 509 | 59,171 |
| 2008 | 700 | 59,364 |
| 2009 | 869 | 59,421 |
| 2010 | 635 | 59,425 |
| 2011 | 807 | 59,486 |
| 2012 | 847 | 59,615 |

The Department notes that the previous upward trend appears to be stabilizing in recent years. The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules, part 7826.1900.

*7. Customer Complaints*

The reporting on customer complaints must include the following information by customer class and calendar month:

A. the number of complaints received;

B. the number and percentage of complaints alleging billing errors, inaccurate metering, wrongful disconnection, high bills, inadequate service, and the number involving service extension intervals, service restoration intervals, and any other identifiable subject matter involved in five percent or more of customer complaints;

[6] Source: Otter Tail's "Minnesota Electric Utility Annual Report." Annual reports are filed by Minnesota utilities on July 1 of each year.

C. the number and percentage of complaints resolved upon initial inquiry, within ten days, and longer than ten days;

D. the number and percentage of all complaints resolved by taking any of the following actions: (1) taking the action the customer requested; (2) taking an action the customer and the utility agree is an acceptable compromise; (3) providing the customer with information that demonstrates that the situation complained of is not reasonably within the control of the utility; or (4) refusing to take the action the customer requested; and

E. the number of complaints forwarded to the utility by the Commission's Consumer Affairs Office for further investigation and action.

OTP's report on customer complaints includes the required information. Table 10 contains a limited summary of OTP's customer complaint history.

**Table 10: OTP Customer Complaint Selected Summary**

| | Number of Complaints | High Bills | Billing Error | Service Restoration | Resolved Upon Initial Inquiry | Took Action Customer Requested |
|---|---|---|---|---|---|---|
| 2005 | 286 | 49% | 7% | 2% | 41% | 66% |
| 2006 | 175 | 39% | 7% | 2% | 54% | 49% |
| 2007 | 220 | 27% | 29% | 5% | 66% | 46% |
| 2008 | 325 | 52% | 18% | 2% | 60% | 34% |
| 2009 | 185 | 29% | 14% | 5% | 78% | 36% |
| 2010 | 91 | 26% | 11% | 11% | 78% | 25% |
| 2011 | 110 | 19% | 9% | 10% | 73% | 30% |
| 2012 | 61 | 7% | 11% | 7% | 72% | 32% |

The Department notes that the increase in the service restoration complaint category percentage in 2010 and 2011 coincides with the weather challenges reported by OTP.

The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules, part 7826.2000.

*E. COMPLIANCE WITH DECEMBER 20, 2012 ORDER*

*1. Within 45 days of the date of the Order, the Company shall file a full action plan as required by Minnesota Rules 7826.0500, subpt. 1(E).*

On February 4, 2013, OTP filed a full action plan as required by the Commission. The Company also provided a summary of its February 4th filing on page 26 of its 2013 Annual Report.

2. *Include in its next filing a description of the policies, procedures, and actions the Company has implemented, and plans to implement, to ensure reliability, including information demonstrating proactive management of the system as a whole, increased reliability, and active contingency planning.*

OTP provided a list and description of weekly and monthly internal reports used to monitor system reliability and guide capital budget decisions. The Company also summarized its inspection and testing protocols and listed several other policies, procedures, and committees used to evaluate reliability and safety concerns. Finally, OTP summarized its compliance filing submitted on February 4, 2013 pursuant to the Commission's December 20, 2012 Order in Docket No. E017/M-12-325, which describes the Company's action plans to address missing several 2011 reliability standards set by the Commission.

3. *Include in its next filing a summary table that allows the reader to more easily assess the overall reliability of the system and to identify main factors that affect reliability.*

OTP provided a summary of the Company's management's view of reliability including how reliability performance is integrated into Key Performance Indicators. OTP provided several graphs showing various aspects of reliability and customer service performance.

4. *Include in its next filing a comparison of the results of using the IEEE 2.5 beta method and its former method of storm normalization.*

OTP provided a comparison of its reliability results using both the IEEE 2.5 beta method and its former method of storm normalization. The Department notes that, in 2012, both methods ended in the same results for the Crookston, Milbank, Morris, and Wahpeton customer service centers (CSCs). OTP's former method of storm normalization resulted in significantly higher (worse) metrics than the IEEE 2.5 beta method for its Bemidji CSC.

5. *Include in its next filing a report on the major causes of outages for major event days.*

July 2, 2012 met the criteria to be considered a major event day during 2012. OTP reported that outages on this day were due to several large storm systems in which strong sustained straight line winds, heavy rain and lightning moved through central and northern potions of its service territory, causing extensive damage to the Company's system.[7]

*F. SMART GRID REPORT*

OTP stated that the Company has made investments in "Smart Grid" technologies in several areas and for many years. OTP discussed each Smart Grid-type application currently in use. These applications are as follows:

[7] 2013 Annual Report, page 8.

1. Peak-Shaving Technologies – A radio control system enables OTP to reduce controllable load during periods of high demand. OTP has nearly 40,700 meters installed associated with demand response tariffs and has demonstrated over 100 MW of control during the coldest days in the winter, or approximately 12 – 15 percent of the Company's on peak capacity needs.

2. Energy Storage System – Under-floor heating, brick storage furnaces, and brick room heaters are used to store thermal energy allowing buildings to remain comfortable during long periods of load control.

3. Time-Varying Rates – Several tariffs charge customers based on when electricity is used and/or controlled.

4. Electricity Meters – Approximately 0.30 percent of OTP's meters are capable of time of day meter readings, or of providing interval data, and/or can be read remotely.

5. Protective Relaying – OTP's system includes protective relay devices that can provide fault location data; OTP is participating in the North American SynchroPhasor initiative by installing special relays and related communications in eight substations, with six more substation installs planned for 2013.

6. Interruption Monitoring System – OTP's IMS allows web-based analysis and application tools regarding voltage alarm notifications and graphical outage status updates. As of 2012, all service representatives receive interruption alarms when feeders they are responsible for experience an outage.

7. Mobile Data Pilot Project – While in the field, Customer Service Representatives have access to maps of OTP's electrical system, customer information, interruption and load management information and other useful information. In 2013, OTP will continue to look for ways to enhance the hardware used by Service Representatives, including piloting the use of smart phones and tablets in the field.

8. Power Profiler – This is a fee-based on-line program enabling interval metering customers to obtain detailed reports on their energy usage to aid them in managing energy and demand profiles.

9. Bill Analyzer – Customers can input home profile data and analyze their energy use and billing through OTP's website. The Bill Analyzer Project is part of OTP's Conservation Improvement Program (CIP).

10. OPOWER Energy Reporting – OPOWER's patented Home Energy Reporting System is a software platform that combines energy usage data with customer demographic, housing, and geographic information (GIS) data to develop specific, targeted recommendations that educate and motivate consumers to reduce their energy consumption. This is also a CIP project.

11. Fleet Tracking – This is a three-year pilot program where a sample group of fleet vehicles have been equipped with a device to provide real time geospatial information on Company vehicles. This technology is intended to optimize responses to service interruptions, enhance safety, reduce operation and maintenance expenses.

12. Geographic Information System (GIS) – The GIS will ultimately provide a single, interactive map for asset information. The goal of the GIS is to enhance communication with employees and customers, leverage existing data systems to track and manage the Company's assets more efficiently, and provide geo-spatial information of the Company's assets along with related attributes and detail.

## III. RECOMMENDATIONS

The Department recommends that the Commission accept OTP's 2013 Annual Report in fulfillment of the requirements of Minnesota Rules, Chapter 7826 and the Commission's December 20, 2012 Order.

The Department also recommends that the Commission set the Company's reliability standards for 2013 as proposed by OTP:

| Work Center | SAIDI | SAIFI | CAIDI |
|---|---|---|---|
| Bemidji | 70.64 | 1.26 | 56.06 |
| Crookston | 69.33 | 1.19 | 58.26 |
| Fergus Falls | 66.97 | 1.11 | 60.33 |
| Milbank | 75.49 | 1.82 | 41.48 |
| Morris | 55.78 | 1.01 | 55.23 |
| Wahpeton | 57.24 | 1.13 | 50.65 |

Finally, the Department requests that the Company provide an update on the Morris CSC and what, if any, actions have been identified or taken to improve reliability in this CSC.

/jl

# CHAPTER 7826

# PUBLIC UTILITIES COMMISSION

# ELECTRIC UTILITY STANDARDS

## 7826.0100 APPLICABILITY.

This chapter applies to all persons, corporations, or other legal entities engaged in the retail distribution of electric service to the public, with the following exceptions:

A. cooperative electric associations;

B. municipal utilities;

C. persons distributing electricity only to tenants or cooperative or condominium owners in buildings owned, leased, or operated by those persons;

D. persons distributing electricity only to occupants of a manufactured home or trailer park owned, leased, or operated by those persons; and

E. persons distributing electricity to fewer than 25 persons.

**Statutory Authority:** *MS s 216B.81*

**History:** *27 SR 1174*

**Posted:** *February 13, 2003*

**7826.0200 DEFINITIONS.**

Subpart 1. **Scope.** The terms used in this chapter have the meanings given them in this part.

Subp. 2. **Bulk power supply facility.** "Bulk power supply facility" means the interconnected system that encompasses the electric generation resource, transmission lines, transmission substations, and associated equipment that, upon a total, simultaneous, and sustained interruption, disrupts service to all distribution feeders exiting that substation when those distribution feeders do not have service restoration interconnections with alternate sources.

Subp. 3. **Cold weather rule.** "Cold weather rule" means the set of protections against disconnection during the heating season set forth in Minnesota Statutes, sections 216B.096 and 216B.097.

Subp. 4. **Customer average interruption duration index or CAIDI.** "Customer average interruption duration index" or "CAIDI" means the average customer-minutes of interruption per customer interruption. It approximates the average length of time required to complete service restoration. It is determined by dividing the annual sum of all customer-minutes of interruption durations by the annual number of customer interruptions, using storm-normalized data.

Subp. 5. **Customer complaint.** "Customer complaint" means any call center communication by a utility customer in which the customer states a grievance related to the utility's provision of service to that customer.

Subp. 6. **Interruption.** "Interruption" means an interruption of service to a customer with a duration greater than five minutes.

Subp. 7. **Major service interruption.** "Major service interruption" means an interruption of service at the feeder level or above and affecting 500 or more customers for one or more hours.

Subp. 8. **Resolved.** "Resolved," used in regard to customer complaints, means that the utility has examined the complainant's claims, conducted any necessary investigation, and done one of the following:

A. taken the action the customer requests;

B. taken an action the customer and the utility agree is an acceptable compromise;

C. provided the customer with information that demonstrates that the situation complained of is not reasonably within the control of the utility; or

D. refused to take the action the customer requested and communicated that refusal to the customer.

Subp. 9. **Storm-normalized data.** "Storm-normalized data" means data that has been adjusted to neutralize the effects of outages due to major storms.

Subp. 10. **System average interruption duration index or SAIDI.** "System average interruption duration index" or "SAIDI" means the average customer-minutes of interruption per customer. It is determined by dividing the annual sum of customer-minutes of interruption by the average number of customers served during the year, using storm-normalized data.

Subp. 11. **System average interruption frequency index or SAIFI.** "System average interruption frequency index" or "SAIFI" means the average number of interruptions per customer per year. It is determined by dividing the total annual number of customer interruptions by the average number of customers served during the year, using storm-normalized data.

Subp. 12. **Utility.** "Utility" means any person, corporation, or other legal entity engaged in the retail distribution of electric service to the public, with the following exceptions:

A. cooperative electric associations;

B. municipal utilities;

C. persons distributing electricity only to tenants or cooperative or condominium owners in buildings owned, leased, or operated by those persons;

D. persons distributing electricity only to occupants of a manufactured home or trailer park owned, leased, or operated by those persons; and

E. persons distributing electricity to fewer than 25 persons.

Subp. 13. **Work center.** "Work center" means a portion of a utility's assigned service area that it treats as an administrative subdivision for purposes of maintaining and repairing its distribution system.

**Statutory Authority:** *MS s 216B.81*

**History:** *27 SR 1174; L 2009 c 110 s 37*

**Posted:** *June 2, 2009*

## SAFETY

### 7826.0300 SAFETY STANDARDS.

Subpart 1. **National Electrical Safety Code.** When constructing new facilities or reinvesting capital in existing facilities, utilities shall comply with the requirements stated at the time the work is done in the then most recently published edition of the National Electrical Safety Code, as published by the Institute of Electrical and Electronics Engineers, Inc. and approved by the American National Standards Institute. This code is incorporated by reference, is not subject to frequent change, and is conveniently available to the public through the statewide interlibrary loan system.

Subp. 2. **Standards and recommended practices of the Institute of Electrical and Electronics Engineers, Inc. and the American National Standards Institute.** Utilities are encouraged to follow the recommended practices of the Institute of Electrical and Electronics Engineers, Inc. and the American National Standards Institute on electricity metering and standard voltage ratings for electric power systems and equipment. Utility compliance with these recommended practices creates a rebuttable presumption that a practice is reasonable.

Subp. 3. **Occupational Safety and Health Administration rules.** When constructing, installing, refurbishing, or maintaining facilities, utilities shall comply with all regulations promulgated by the United States Occupational Safety and Health Administration and by the Occupational Safety and Health Division of the Minnesota Department of Labor and Industry.

**Statutory Authority:** *MS s 216B.81*

**History:** *27 SR 1174*

**Posted:** *February 13, 2003*

### 7826.0400 ANNUAL SAFETY REPORT.

On or before April 1 of each year, each utility shall file a report on its safety performance during the last calendar year. This report shall include at least the following information:

A. summaries of all reports filed with the United States Occupational Safety and Health Administration and the Occupational Safety and Health Division of the Minnesota Department of Labor and Industry during the calendar year; and

B. a description of all incidents during the calendar year in which an injury requiring medical attention or property damage resulting in compensation occurred as a result of downed wires or other electrical system failures and all remedial action taken as a result of any injuries or property damage described.

**Statutory Authority:** *MS s 216B.81*

**History:** *27 SR 1174*

**Posted:** *February 13, 2003*

## RELIABILITY

### 7826.0500 RELIABILITY REPORTING REQUIREMENTS.

Subpart 1. **Annual reporting requirements.** On or before April 1 of each year, each utility shall file a report on its reliability performance during the last calendar year. This report shall include at least the following information:

A. the utility's SAIDI for the calendar year, by work center and for its assigned service area as a whole;

B. the utility's SAIFI for the calendar year, by work center and for its assigned service area as a whole;

C. the utility's CAIDI for the calendar year, by work center and for its assigned service area as a whole;

D. an explanation of how the utility normalizes its reliability data to account for major storms;

E. an action plan for remedying any failure to comply with the reliability standards set forth in part 7826.0600 or an explanation as to why noncompliance was unavoidable under the circumstances;

F. to the extent feasible, a report on each interruption of a bulk power supply facility during the calendar year, including the reasons for interruption, duration of interruption, and any remedial steps that have been taken or will be taken to prevent future interruption;

G. a copy of each report filed under part 7826.0700;

H. to the extent technically feasible, circuit interruption data, including identifying the worst performing circuit in each work center, stating the criteria the utility used to identify the worst performing circuit, stating the circuit's SAIDI, SAIFI, and CAIDI, explaining the reasons that the circuit's performance is in last place, and describing any operational changes the utility has made, is considering, or intends to make to improve its performance;

I. data on all known instances in which nominal electric service voltages on the utility's side of the meter did not meet the standards of the American National Standards Institute for nominal system voltages greater or less than voltage range B;

J. data on staffing levels at each work center, including the number of full-time equivalent positions held by field employees responsible for responding to trouble and for the operation and maintenance of distribution lines; and

K. any other information the utility considers relevant in evaluating its reliability performance over the calendar year.

Subp. 2. **Initial reporting requirements.** By March 30, 2003, each utility shall file its SAIDI, SAIFI, and CAIDI for each of the past five calendar years, by work center and for its assigned service area as a whole. If this information is not available, the utility shall file an explanation of how it has been tracking reliability for the past five years, together with reliability data for that period of time. If the utility has implemented a new reliability tracking system that makes comparisons between historical data and current data unreliable, the utility shall explain this situation in its filing.

**Statutory Authority:** *MS s 216B.81*

**History:** *27 SR 1174*

**Posted:** *February 13, 2003*

## 7826.0600 RELIABILITY STANDARDS.

Subpart 1. **Annually proposed individual reliability standards.** On or before April 1 of each year, each utility shall file proposed reliability performance standards in the form of proposed numerical values for the SAIDI, SAIFI, and CAIDI for each of its work centers. These filings shall be treated as "miscellaneous tariff filings" under the commission's rules of practice and procedure, part 7829.0100, subpart 11.

Subp. 2. **Annually set, utility-specific, reliability standards.** The commission shall set reliability performance standards annually for each utility in the form of numerical values for the SAIDI, SAIFI, and CAIDI for each of its work centers. These standards remain in effect until the commission takes final action on a filing proposing new standards or changes them in another proceeding.

**Statutory Authority:** *MS s 216B.81*

**History:** *27 SR 1174*

**Posted:** *February 13, 2003*

## 7826.0700 REPORTING MAJOR SERVICE INTERRUPTIONS.

Subpart 1. **Contemporaneous reporting.** A utility shall promptly inform the commission's Consumer Affairs Office of any major service interruption. At that time, the utility shall provide the following information, to the extent known:

A. the location and cause of the interruption;

B. the number of customers affected;

C. the expected duration of the interruption; and

D. the utility's best estimate of when service will be restored, by geographical area.

Subp. 2. **Written report.** Within 30 days, a utility shall file a written report on any major service interruption in which ten percent or more of its Minnesota customers were out of service for 24 hours or more. This report must include at least a description of:

A. the steps the utility took to restore service; and

B. any operational changes the utility has made, is considering, or intends to make, to prevent similar interruptions in the future or to restore service more quickly in the future.

**Statutory Authority:** *MS s 216B.81*

**History:** *27 SR 1174*

**Posted:** *February 13, 2003*

## SERVICE

### 7826.0800 CUSTOMER NOTICE OF PLANNED SERVICE INTERRUPTIONS.

Utilities shall give customers the most effective actual notice possible of any planned service interruption expected to last longer than 20 minutes. For any planned interruption expected to exceed four hours, the utility shall provide, if feasible, mailed notice one week in advance and notice by telephone or door-to-door household visits 12 to 72 hours before the interruption. Planned service interruptions must be scheduled at times to minimize the inconvenience to customers. When planned service interruptions exceeding four hours are canceled, utilities shall notify, if feasible, the customers who received notice that service would be interrupted.

**Statutory Authority:** *MS s 216B.81*

**History:** *27 SR 1174*

**Posted:** *February 13, 2003*

### 7826.0900 METER READING FREQUENCY; CUSTOMER ACCOMMODATION.

Subpart 1. **Meter reading performance standard.** Utilities shall attempt to read all meters on a monthly basis unless otherwise authorized by the commission. Utilities are assumed to be in compliance with this standard if they read at least 90 percent of all meters during the months of April through November and at least 80 percent of all meters during the months of December through March. Utilities shall contact any customer whose bill has been estimated for two consecutive months and attempt to schedule a meter reading.

Subp. 2. **Evening and weekend meter reading.** Utilities shall read meters during the evening or on Saturday or Sunday for customers whose meters are inaccessible and whose work or other schedule makes meter reading during regular business hours a hardship. When a utility contacts a customer on an individual basis to schedule a meter reading, the utility shall inform the customer of the available alternatives that the utility provides, such as the customer's option to provide a self-read. If alternative arrangements are not acceptable to the customer, the utility shall inform the customer that the utility provides evening and weekend meter reading for customers whose work schedule or other schedule makes meter reading during regular business hours a hardship.

**Statutory Authority:** *MS s 216B.81*

**History:** *27 SR 1174*

**Posted:** *February 13, 2003*

## 7826.1000 REPLACING MALFUNCTIONING METERS.

Utilities shall replace a malfunctioning meter within ten calendar days of receiving a report from a customer questioning its accuracy or within ten calendar days of learning in some other way that it may be inaccurate.

**Statutory Authority:** *MS s 216B.81*

**History:** *27 SR 1174*

**Posted:** *February 13, 2003*

## 7826.1100 KEEPING SERVICE CALLS.

Utilities shall keep service call appointments and shall provide as much notice as possible when an appointment cannot be kept. A service call appointment is kept if the worker arrives within a four-hour period set by the utility and clearly communicated to the customer.

**Statutory Authority:** *MS s 216B.81*

**History:** *27 SR 1174*

**Posted:** *February 13, 2003*

## 7826.1200 CALL CENTER RESPONSE TIME.

Subpart 1. **Calls to business office.** On an annual basis, utilities shall answer 80 percent of calls made to the business office during regular business hours within 20 seconds. "Answer" means that an operator or representative is ready to render assistance or accept the information to handle the call. Acknowledging that the customer is waiting on the line and will be served in turn is not an answer. If the utility uses an automated call-processing system, the 20-second period begins when the customer has selected a menu option to speak to a live operator or representative. Utilities using automatic call-processing systems must provide that option, and they must not delay connecting the caller to a live operator or representative for purposes of playing promotional announcements.

Subp. 2. **Calls regarding service interruptions.** On an annual basis, utilities shall answer 80 percent of calls directed to the telephone number for reporting service interruptions within 20 seconds. "Answer"

may mean connecting the caller to a recording providing, to the extent practicable, at least the following information:

A. the number of customers affected by the interruption;

B. the cause of the interruption;

C. the location of the interruption; and

D. the utility's best estimate of when service will be restored, by geographical area.

**Statutory Authority:** *MS s 216B.81*

**History:** *27 SR 1174*

**Posted:** *February 13, 2003*

### 7826.1300 ANNUAL SERVICE QUALITY REPORT FILING.

On or before April 1 of each year, each utility shall file a report on its service quality performance during the last calendar year. These filings must be treated as "miscellaneous tariff filings" under the commission's rules of practice and procedure, part 7829.0100, subpart 11. This report must include at least the information set forth in parts 7826.1400 to 7826.2000.

**Statutory Authority:** *MS s 216B.81*

**History:** *27 SR 1174*

**Posted:** *February 13, 2003*

## REPORTING

### 7826.1400 REPORTING METER-READING PERFORMANCE.

The annual service quality report must include a detailed report on the utility's meter-reading performance, including, for each customer class and for each calendar month:

A. the number and percentage of customer meters read by utility personnel;

B. the number and percentage of customer meters self-read by customers;

C. the number and percentage of customer meters that have not been read by utility personnel for periods of six to 12 months and for periods of longer than 12 months, and an explanation as to why they have not been read; and

D. data on monthly meter-reading staffing levels, by work center or geographical area.

**Statutory Authority:** *MS s 216B.81*

**History:** *27 SR 1174*

**Posted:** *February 13, 2003*

### 7826.1500 REPORTING INVOLUNTARY DISCONNECTIONS.

The annual service quality report must include a detailed report on involuntary disconnections of service, including, for each customer class and each calendar month:

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.

**Statutory Authority:** *MS s 216B.81*

**History:** *27 SR 1174; L 2009 c 110 s 37*

**Posted:** *June 2, 2009*

### 7826.1600 REPORTING SERVICE EXTENSION REQUEST RESPONSE TIMES.

The annual service quality report must include a report on service extension request response times, including, for each customer class and each calendar month:

A. the number of customers requesting service to a location not previously served by the utility and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service; and

B. the number of customers requesting service to a location previously served by the utility, but not served at the time of the request, and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service.

**Statutory Authority:** *MS s 216B.81*

**History:** *27 SR 1174*

**Posted:** *February 13, 2003*

### 7826.1700 REPORTING CALL CENTER RESPONSE TIMES.

The annual service quality report must include a detailed report on call center response times, including calls to the business office and calls regarding service interruptions. The report must include a month-by-month breakdown of this information.

**Statutory Authority:** *MS s 216B.81*

**History:** *27 SR 1174*

**Posted:** *February 13, 2003*

### 7826.1800 REPORTING EMERGENCY MEDICAL ACCOUNT STATUS.

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.

**Statutory Authority:** *MS s 216B.81*

**History:** *27 SR 1174*

**Posted:** *February 13, 2003*

### 7826.1900 REPORTING CUSTOMER DEPOSITS.

The annual service quality report must include the number of customers who were required to make a deposit as a condition of receiving service.

**Statutory Authority:** *MS s 216B.81*

**History:** *27 SR 1174*

**Posted:** *February 13, 2003*

### 7826.2000 REPORTING CUSTOMER COMPLAINTS.

The annual service quality report must include a detailed report on complaints by customer class and calendar month, including at least the following information:

A. the number of complaints received;

B. the number and percentage of complaints alleging billing errors, inaccurate metering, wrongful disconnection, high bills, inadequate service, and the number involving service-extension intervals, service-restoration intervals, and any other identifiable subject matter involved in five percent or more of customer complaints;

C. the number and percentage of complaints resolved upon initial inquiry, within ten days, and longer than ten days;

D. the number and percentage of all complaints resolved by taking any of the following actions:

(1) taking the action the customer requested;

(2) taking an action the customer and the utility agree is an acceptable compromise;

(3) providing the customer with information that demonstrates that the situation complained of is not reasonably within the control of the utility; or

(4) refusing to take the action the customer requested; and

E. the number of complaints forwarded to the utility by the commission's Consumer Affairs Office for further investigation and action.

**Statutory Authority:** *MS s 216B.81*

**History:** *27 SR 1174*

**Posted:** *February 13, 2003*

## 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. E017/M-13-253**

Dated this **31st** day of **July, 2013**

**/s/Sharon Ferguson**

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|---|---|---|---|---|---|---|---|
| Christopher | Anderson | canderson@allete.com | Minnesota Power | 30 W Superior St<br>Duluth,<br>MN<br>558022191 | Electronic Service | No | OFF_SL_13-253_M-13-253 |
| Julia | Anderson | Julia.Anderson@ag.state.mn.us | Office of the Attorney General-DOC | 1800 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012134 | Electronic Service | Yes | OFF_SL_13-253_M-13-253 |
| Michael | Bradley | bradleym@moss-barnett.com | Moss & Barnett | 4800 Wells Fargo Ctr<br>90 S 7th St<br>Minneapolis,<br>MN<br>55402-4129 | Electronic Service | No | OFF_SL_13-253_M-13-253 |
| Gary | Chesnut | gchesnut@agp.com | AG Processing Inc. a cooperative | 12700 West Dodge Road<br>PO Box 2047<br>Omaha,<br>NE<br>681032047 | Electronic Service | No | OFF_SL_13-253_M-13-253 |
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| Sharon | Ferguson | sharon.ferguson@state.mn.us | Department of Commerce | 85 7th Place E Ste 500<br>Saint Paul,<br>MN<br>551012198 | Electronic Service | No | OFF_SL_13-253_M-13-253 |
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| Burl W. | Haar | burl.haar@state.mn.us | Public Utilities Commission | Suite 350<br>121 7th Place East<br>St. Paul,<br>MN<br>551012147 | Electronic Service | Yes | OFF_SL_13-253_M-13-253 |
| Shane | Henriksen | shane.henriksen@enbridge.com | Enbridge Energy Company, Inc. | 1409 Hammond Ave FL 2<br>Superior,<br>WI<br>54880 | Electronic Service | No | OFF_SL_13-253_M-13-253 |
| James D. | Larson | N/A | Avant Energy Services | 220 S 6th St Ste 1300<br>Minneapolis,<br>MN<br>55402 | Paper Service | No | OFF_SL_13-253_M-13-253 |

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| Douglas | Larson | dlarson@dakotaelectric.com | Dakota Electric Association | 4300 220th St W<br>Farmington,<br>MN<br>55024 | Electronic Service | No | OFF_SL_13-253_M-13-253 |
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| Larry L. | Schedin | Larry@LLSResources.com | LLS Resources, LLC | 12 S 6th St Ste 1137<br>Minneapolis,<br>MN<br>55402 | Paper Service | No | OFF_SL_13-253_M-13-253 |
| Stuart | Tommerdahl | stommerdahl@otpco.com | Otter Tail Power Company | 215 S Cascade St<br>PO Box 496<br>Fergus Falls,<br>MN<br>56537 | Electronic Service | No | OFF_SL_13-253_M-13-253 |