

August 19, 2020

William Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
Saint Paul, MN 55101

RE: Docket E002/M-20-406 No In the Matter of Xcel Energy’s Compliance with Annual Safety, Reliability, and Service Quality Metrics for 2019

Dear Mr. Seuffert:

The City of Minneapolis (“Minneapolis”) thanks the Commission for the opportunity to provide comments regarding Xcel Energy’s (“Xcel” or “the Company”) Locational Reliability, Service Quality, and Equity Metrics as part of the Company’s Quality of Service Plan (“QSP”) evaluation. We focus our comments on the locational reliability equity metrics, an area of interest to us as highlighted in our comments related to the performance metrics docket.<sup>1</sup>

**Topic(s) Open for Comment:**

**1. Please provide feedback on the staff proposal for locational reliability reporting (Attachment A). Please discuss:**

**a. Whether the listed reporting requirements will allow for the development of a locational reliability metric**

Minneapolis supports the staff’s reporting proposal<sup>2</sup> for use in the possible development of locational reliability metrics.

**b. Whether any additional information is needed**

Minneapolis recommends also including the following two metrics<sup>3</sup> to allow for the development of a locational reliability metric:

- # of neighborhoods experiencing repeated outages by zip code/census tract and # of neighborhood outages
- # of community critical services that lost grid power by type and location along with the # of times that each of these services lost power.

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<sup>1</sup> City of Minneapolis Comments in Docket No. 19-401 Xcel Energy Performance Metrics. May 6, 2019.

<sup>2</sup> Docket 20-406 Notice of Comment Period. Attachment A Locational/Equity Reliability Staff Proposal. Apr 20, 2020.

<sup>3</sup> Earlier versions of these two metrics were initially introduced in City of Minneapolis Comments in Docket 19-401 Xcel Energy Performance Metrics. May 6, 2019. They have been modified slightly to be easier to evaluate equitable delivery of services.

**c. How the information can best be presented to stakeholders and the public**

Minneapolis recommends a table format and an interactive heat map with city boundaries showing which feeder areas have recurring reliability issues and the most outages. We believe that an interactive map will be more user-friendly and improve visual understanding compared to a static map.

**2. What are the appropriate pieces of data to collect to gauge locational customer service quality?**

Minneapolis recommends reporting data on ‘disconnections by zip code/census tract’ under customer service quality.

**3. What are the appropriate pieces of information to overlay with reliability and customer service quality data to gauge equity? For example, the Minnesota Pollution Control Agency maintains a map showing areas of environmental concern that could be overlaid with data listed in Attachment A.**

A variety of data is already collected and reported that could be displayed in an interactive map similar to the Minnesota Pollution Control Agency’s “What’s In My Neighborhood” on-line map<sup>4</sup> and agrees with staff that this offers a positive example. Importantly, the map is searchable by:

- Location
- City, county, watershed or Zip Code
- Township / Range
- Other data of interest in energy, such as tribal areas and census tracts with higher concentrations of low-income residents and people of color

Similarly, relevant data is available in tabular format and searchable by text.<sup>5</sup>

In summary, the City of Minneapolis recognizes that a great deal of equity-related data of interest is already collected and reported by Xcel and is hopeful that with modest investments in interactive mapping, the data may improve stakeholders’ ability to identify areas of opportunity for improving the equitable delivery of electricity. Similarly, identifying the proper data may even lead to the development of equity-centered performance metrics. We appreciate and support Commission staff’s development of a proposed list of data to measure equity-centered reliability for Xcel’s Minnesota customers. Thank you for your consideration of our comments.

Sincerely,



Mr. Kim W. Havey, LEED AP, AICP  
Division of Sustainability

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<sup>4</sup> See What’s in My Neighborhood. <https://www.pca.state.mn.us/data/whats-my-neighborhood>. Accessed Aug 13, 2020.

<sup>5</sup> We note that Metropolitan Council is updating their on-line “[Visualizing Regional Inequities](#)” tool, which may provide another agency example of an equity-centered data tool. ‘2020 Update. The Community Development Research Team is working on an update to this tool, adding 2018 data and expanding...equity metrics.’ Accessed Aug 14, 2020.

STATE OF MINNESOTA    )  
                                  ) ss.    **CERTIFICATE OF SERVICE**  
COUNTY OF HENNEPIN    )

I, Stacy A. Miller, of the City of Minneapolis, County of Hennepin, State of Minnesota, affirm that on the 19th day of August 2020, I served a copy of the following via e-mail and/or via U.S. Mail:

**Comments of the City of Minneapolis regarding Docket No. 20--406**

at the last known mailing addresses and email addresses of said entities/individuals on the attached Service List. If by U.S. Mail, I placed said document in postage prepaid envelope and placed same in the U.S. Post Office in Minneapolis, Minnesota for delivery by the United States Postal Service.



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Stacy A. Miller

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