STATE OF MINNESOTA
BEFORE THE PUBLIC UTILITIES COMMISSION

Katie Sieben	Chair
Joseph K. Sullivan	Vice-Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
John Tuma	Commissioner

In the Matter of Xcel Energy's Compliance with Annual Safety, Reliability, and Service Quality Metrics for 2019

MPUC DOCKET NO. E002/M-20-406

INITIAL COMMENTS OF THE SUBURBAN RATE AUTHORITY

INTRODUCTION

These are the initial comments of Suburban Rate Authority ("SRA") regarding Locational Reliability, Service Quality and Equity Metrics for Xcel Energy in response to the Commission's Notice of Comment dated April 20, 2020. The SRA appreciates the opportunity to participate in this important docket. Metrics measuring Locational Reliability, Service Quality and Equity related to outage or interruption issues within the control of Xcel ("Outage") clearly are core components of utility performance.

The SRA is mindful of the multiple measures of Outage frequency and duration established by the Commission in Xcel's Service Quality Tariff to achieve improved Xcel averages in Outages reduction.[1] Averages are measured by areas such as zip codes or system-wide to gauge improvement/regression in reliability. To the SRA's knowledge, the "Equity" component has not been measured previously and, thus, is an important metric to ensure uniformity of service regardless of external factors such as socio-economic distinctions or other circumstances that should be unrelated to service. Equity data will be helpful to the Commission and are or will be another relevant metric of Xcel's service standards and goals.

[1] *See* Xcel Electric Rate Book, Schedule of Rates, Charges, Rules and Regulations, Section 1.9 E.

Beyond the helpful metric averages found in measures such as SAIDI, SAIFI and CEMI, the SRA seeks to explore metrics that measure customer experience during and throughout Outages, particularly those greater than the Xcel average in frequency or duration. Does Xcel communicate with the affected customers promptly, told of the cause (if known) and expected duration; kept apprised of Xcel efforts to restore power and correct as well as advised of plans to eliminate the repeat of the problem causing the Outage? As governmental bodies, SRA members appreciate that such prompt and direct communication and action is challenging. Further, it takes two parties to communicate a message. Learning about the problem, however, both educates the customer and can provide reassurance rather than feed the speculation that grows in the absence of information.

The SRA believes that utility communication to and with its customer is a large component of Service Quality. The promptness, accuracy and consistency of that communication to all service areas measures locational Equity. In the end, most customers want the opportunity to be informed of the "hows" and "whys" of Outages. Further, while averages are important to the Commission in measuring performance, customers who are subject to below average performance in any category are not reassured by impressive averages.

The SRA is aware of and appreciates that Xcel has website links dedicated to "Outages & Emergencies" that reflect an apparent quick response to this very subject on several levels. The SRA will listen with interest as to how Xcel informs those customers in matters of providing direct and specific information to the affected customers and responsive in correcting chronic problems that not only affect SAIDI, SAIFI and CEMI averages but those areas that exceed the averages generated by those measures.

The SRA's comments below will often have a frame of reference set forth above. To that end, the SRA appreciates the Commission staff's metric proposals (Notice, Attachment A) that seek to address certain measures addressing the foregoing SRA concerns.

COMMENTS

Docket E002/M-20-406 (Xcel Energy) – Locational Reliability, Service Quality, and Equity Metrics

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

As noted, a number of staff's proposed reporting topics/performance metrics speak to the SRA's above-stated interest in addressing Xcel's response to customers within Outage areas when they need information and help.

If this proceeding reveals gaps in Xcel-customer communication, the problem areas can be highlighted with annual reporting of the information in nos. 1 a-l and 2 a-d, g and 3. Xcel's real time map of "Outage & Emergencies" on its website is a platform for quick and relevant initial information dissemination to affected customers. The staff list should be analyzed for additions to the website or other means of informing those affected of the cause, restoration projection and other relevant information. It is unclear to the SRA, however, how many customers in Outage-affected areas access this site and obtain their information thereby. Does Xcel utilize other means of communication to report or receive messages on Outages such as customer emails, text messages, or voicemails? When a customer does respond with questions, does Xcel have the ability to respond promptly? Are metrics available to establish standards and identify needs in Outage or Emergency-affected direct customer communication during and even following the Outage period? If so, what level of information can be given and how much is necessary plans for permanent rather than temporary repair and restoration?

When Outages occur, effective communication to all affected is a challenging task; especially to the passive customer whose attention is hard to gain. Yet, informative explanations as to cause, duration and repeatability are a part of Service Quality. The SRA realizes that the latter is highly challenging given the risk of communicating speculative or ultimately inaccurate projections that confuse or mislead customers. The SRA looks forward to a dialog and possible additional staff metrics on customer communication that speaks to Service Quality in Outage and Emergency circumstances.

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

The SRA hopes that locational areas of measurement can be reduced to the point of identifying underperforming sub-areas that repeatedly impact an identifiable neighborhood or sub-group within a zip code or larger municipality. By including feeder locations (Att. A at 2 a-e), staff attempts to get at such a metric. The SRA hopes that with Xcel's new technology, locational reliability metrics can measure smaller and smaller areas to call out discrepancies in reliability as it may relate to, e.g., socio-economic, infrastructure age, topographical or other criteria.

In addition, data on overhead versus underground distribution facilities and Outage frequency and duration is of high interest to the SRA. Underground electric facilities have long been recognized as the safer means of delivering electricity to customers from the standpoint of travel (poles and wires near right-of-way) and personal proximity (downed wires and sidewalks).[2] Overhead distribution lines however, have remained Xcel's "standard" facility and underground lines "special" facilities, in most service areas.[3] Xcel's current distribution system employs both overhead and underground facilities to deliver electricity to customers, and has for many decades.

[2] *Northern States Power v. City of Oakdale*, 588 N.W.2d 534, 542 (Minn. App. 1999).
[3] *See* Xcel Electric Rate Book, Schedule of Rates, Charges, Rules and Regulations, Section 5.3 A. 5 - D.

As a result, there is undoubtedly much data on reliability as it relates to the predominance of either of these two types of lines. A metric measuring the overall reliability of each may be definable now to further the goal of reducing Outages.

Regarding Equity considerations of locational reliability, the SRA appreciates the opportunity to have reviewed a preliminary Xcel metric regarding Outage data identified by zip code and median income associated with the zip codes. This appears to be a helpful approach to the important question of whether there is a correlation between lower income service areas and more frequent and/or longer duration Outages, or the opposite. The SRA also sees the benefit of measuring smaller areas than zip codes, which will often have multiple levels of socio-economic and other conditions; and thus suffer from customers and customer groups lost in averages of larger and diverse areas.

b. Whether any additional information is needed

Xcel's Outage & Emergencies website contains the type of information highly valuable to the customer able to access it, i.e., owning a computer with access to internet and/or mobile device. Xcel's filing also references its efforts to communicate with customers and to keep customers informed of service issues that may arise, including planned Outages.[4] It may be informative to determine which are the most effective means of communication and whether those means achieve varying penetration levels by the different zip codes or other service areas reflecting differing socio-economic levels. If so, does Xcel have other means of communicating with the affected customers who may not be as able to access information via technology? Measures of Xcel follow-up communication during and after an extensive Outage may be an important metric in the evaluation of Locational Reliability and Equity in the delivery of this core service.

[4] *See In the Matter of Xcel Energy's Compliance with Annual Safety, Reliability, and Service Quality Metrics for 2019*, MPUC Docket E002/M-20-406, Xcel Initial Filing, pp. 51, 84 (Apr. 2, 2020).

The SRA acknowledges that Xcel service of its many customers is more complex than the challenges of communication facing, e.g., an auto mechanic communicating with a single customer about his or her automobile. Yet, the ideal standard of reliability and service in that setting is an intriguing comparison. After the vehicle exhibits problems the customer seeks the identification of the problem and its cause. They want to know the remedy, its cost and the time it will be completed. When that is achieved, the customer can ask for no more – provided the remedy and cost were indeed appropriate. Metrics bringing Xcel – and its customer – closer to such a standard of excellence in the complex challenge of bringing reliable electrical service to all customers should be the goal of this proceeding.

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

Smaller but valid customer group data will bring more accurate Locational Reliability, related Service Quality and Equity information to the stakeholders. Xcel is undoubtedly seeking to achieve that in its proposals but the stakeholders should explore opportunities to further refine, e.g., zip code-wide data including subsets as discussed previously.

Information from Xcel on the number of customers that: (1) access its website and obtain Outage information; (2) call-in and receive such information; and (3) who acknowledge receipt of alternative means of Outage information is important to establish a baseline of Xcel communication to customers during Outages and Emergencies. From there, metrics can be created to measure achievement of and improvement on those levels.

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

Some metrics may include:

a. Frequency of Outage and length of duration within the smallest measurable subgroup area of Xcel service in the past 12-month period. Patterns can be established over the years.

b. Whether the time taken to restore power met the Xcel average for restoration.

c. The communication method, timeliness and penetration level that Xcel makes contact with the customer experiencing the Outages and Emergencies, measured by sub-groups such as zip codes, municipality below a certain size, or homogeneous socio-economic areas.

d. Whether service reliability is greater in areas predominately served by underground or overhead distribution lines.

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.

As noted above, to the extent accurate socio-economic information such as median income is known and accurately measurable on a service area basis, Xcel may be able to combine such geographical areas in its service territory and compare Outage and Emergency frequency and customer communication levels during such events in comparison to other service areas of a higher socio-economic level. Such a metric would speak to whether a basis exists for the position that there is disparity Locational Reliability and Service Quality based on customer income.

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

Xcel must strive to achieve a system of delivering electricity to customers that is fully reliable without deviation as to matters within its control, that it delivers the service and

communicates pertinent information to customers that meet their need for timely information and that such reliability and service can be depended upon throughout Xcel's service area without exceptions based on socio-economic or other non-technical reasons. Metrics that identify anomalies in Reliability are valuable in identifying and rooting out those anomalies; and the more accessible and timely that Reliability information is to all affected customers, the higher Service Quality standard Xcel will have achieved.

The SRA appreciates the opportunity to comment and engage in this important review.

Respectfully submitted,

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KENNEDY & GRAVEN, CHARTERED

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