



December 11, 2025

Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 East Seventh Place, Suite 350
Saint Paul, MN 55101-2147

RE: In the Matter of Docket No. 23-524, Xcel Energy's Approval of a Residential Time of Use Rate Design; and Docket No. 25-27, Xcel Energy's 2024 Annual Safety, Reliability, and Service Quality Report

Dear Ms. Bergman,

The City of Edina ("City") appreciates the continued opportunity to comment on matters related to its utility providers to highlight our community priorities; advance state, regional and local climate goals; and ensure Edina's residents and businesses receive safe, reliable energy services from its providers.

We understand the comment period for Docket No. 23-524 has closed and apologize for our late comments, but believe the concerns highlighted in this letter are particularly relevant to the issue under consideration by the Public Utilities Commission ("Commission") in this open proceeding. These comments are also filed with Docket No. 25-27 related to Xcel Energy's Annual Safety, Reliability, and Service Quality Report, as the issues highlighted in this comment letter are reflective of Xcel Energy's service quality.

Context

The City was notified by the Center for Energy and Environment's MN ASHP Collaborative October e-newsletter that an updated, approved electric space heating rate was available to Xcel Energy residential customers. City staff notified Edina residents via email on November 18, 2025, about the updated electric space heating rate and how to enroll, using information from the Company's rate program website.¹

The recipients of this email were identified using data from Edina's Community Climate Action Fund program, which provides cost-share funding for the purchase of energy efficient equipment. The program is structured to match a percentage of utility rebates received by customers for specific equipment, including cold-climate air-source heat pumps ("ccASHP"). Using data from this program, the City identified and contacted the 28 Edina residents who purchased qualified, rebated ccASHP equipment since the cost-share program launched.

After sending this email, City staff received responses from four residents who noted that they called the Company's residential customer service number to enroll but were told they were ineligible for the rate or that the rate was not available to them. Reasoning provided by the Company's customer service representatives for ineligibility, as cited by the

¹ <https://mn.my.xcelenergy.com/s/residential/heating-cooling/heating-upgrade-rebates>



residents, included the presence of natural gas equipment in the home, such as a stove, water heater, or furnace backup system, none of which is disqualifying equipment according to the Company's program website and filing materials. Each resident noted they confirmed their primary heating fuel source was electricity with the customer service representative but were still incorrectly denied enrollment in the rate program.

Steps to Resolve the Issue

City staff contacted its Xcel Energy community relations manager regarding these issues, as well as additional Company product and channel managers whom City staff have worked with before. Through these relationships, City staff were able to elevate this issue to a higher level than may otherwise be available through typical customer service channels

Xcel Energy staff were immediately responsive to the City's email, requesting contact information so they could follow up directly with residents to enroll them in the program, as well as engage with the Company's customer service teams as a training opportunity. During this communication process, the Company and City learned:

- One resident customer was already enrolled in the rate program even though they were told they were ineligible to participate. They have since been notified of their enrollment.
- One resident customer successfully enrolled in the program, but only after their concern was escalated to a supervisor during their customer service call.
- Two residents have been or are in the process of being enrolled in the rate program after being contacted directly by Xcel Energy's customer service team after the City's escalation.

Concerns & Recommendation

We appreciate the responsiveness of Xcel Energy staff to resolve this issue and their communication with the City to ensure each resident issue was resolved appropriately. However, the City is concerned the customer journey to enroll in the updated electric space heating rate program, whose updated rates have been effective since June 1, 2025, has not been fully rolled out. It is clear there are customer service agents who still have not been properly trained on the eligibility and enrollment process for this rate program, even though they are currently the initial primary contact for program enrollment.

- Using the Company's residential customer service number, Edina residents have been incorrectly told they are ineligible for the electric space heating rate. If not for the City notifying residents of this program and providing City staff contact information if issues arose, the City may not have learned of this enrollment issue and these residents, who are eligible for the rate program, would not have known the City could assist them. There are likely other residents who have had similar customer journey experiences to these four residents; however, they have not escalated to the City because they believe the customer service representative, who is a trusted messenger for the Company, was correct in advising they are ineligible.
- In addition, the City is in a unique position to raise concerns with the utility. Due to our relationships with the Company via the Partners in Energy program and other avenues, the City was able to quickly elevate this issue to higher-level program staff than otherwise may be available to customers. Regardless of relationships or personal contacts with the Company, customers should feel confident that they are receiving correct information from the Company's representatives, and have their concerns addressed appropriately using the typical channels for resolution.

CITY OF EDINA

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The City requests that the Company's implementation plan for the electric space heating rate, as well as any future program, includes a robust internal training process for the Company's customer service agents, supervisors, and other trusted messengers to ensure that when customers use the published, advertised channels to enroll in a program, the customer journey is successful.

The City of Edina appreciates the Commission's consideration of our Comments as it relates to Docket No. 23-524 and Docket No. 25-27.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "MBayer", is written over a light blue horizontal line.

/s/ Marisa Bayer
Sustainability Manager
City of Edina