

Staff Briefing Papers – Volume 2 of 3: Service Quality

Meeting Date	February 19, 2026	Agenda Item ***6
Companies	Northern States Power Co. d/b/a Xcel Energy Minnesota Power Otter Tail Power Co.	
Docket No.	E-002/M-25-27 In the Matter of Xcel Energy’s 2024 Annual Safety, Reliability, and Service Quality (SRSQ) Report. E-015/M-25-29 In the Matter of Minnesota Power’s 2024 SRSQ Report. E-017/M-25-30 In the Matter of Otter Tail Power’s 2024 SRSQ Report.	
Issue	1) Should the Commission accept the Electric Utilities’ 2024 Annual Safety, Reliability, and Service Quality (SRSQ) Reports?	
Staff	Sally Anne McShane Sally.Anne.McShane@state.mn.us Sophie Nikitas Sophie.Nikitas@state.mn.us	651-201-2225 651-539-1062

 Relevant Documents	Date
Xcel Energy	
Xcel Energy 2024 Annual SRSQ Report – Part I: Safety and Service Quality for 2024 and Attachment Q	April 1, 2025
Xcel Energy 2024 Annual SRSQ Report Errata	April 7, 2025
Department of Commerce – Division of Energy Resources Initial Comments	July 11, 2025

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The attached materials are work papers of the Commission Staff. They are intended for use by the Public Utilities Commission and are based upon information already in the record unless noted otherwise.

✓ **Relevant Documents**

BOMA Initial Comments

Date

July 11, 2025

Xcel Energy Reply Comments

August 8, 2025

Minnesota Power

Minnesota Power 2024 Annual SRSQ Report

April 1, 2025

Department of Commerce – Division of Energy Resources Initial
Comments

July 11, 2025

Minnesota Power Reply Comments

July 25, 2025

Minnesota Power Supplemental Comments

August 25, 2025

Department of Commerce – Division of Energy Resources Reply
Comments

November 3, 2025

Department of Commerce – Division of Energy Resources
Supplemental Comments

December 15, 2025

Otter Tail Power

Otter Tail Power 2024 Annual SRSQ Report and Attachments 1-3

April 1, 2025

Department of Commerce – Division of Energy Resources Initial
Comments

July 11, 2025

Otter Tail Power Reply Comments

July 25, 2025

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BACKGROUND

Minnesota’s Electric Investor-Owned Utilities (IOUs) – Minnesota Power (MP), Xcel Energy (Xcel), and Otter Tail Power Company (OTP) (jointly referred to as the Utilities) – submit annual Safety, Reliability, and Service Quality (SRSQ) reports.¹ All three IOUs filed SRSQ reports on April 1, 2025. Standards and reporting requirements are set forth in Minn. Rules Chapter 7826² and Commission Orders. The IOUs submitted their annual SRSQ reports on April 1, 2025.

Volume 1 of the briefing papers will address safety and reliability. This set of the briefing papers, Volume 2, will address service quality. Volume 3 will cover Xcel’s Minn. Rule 7820.2500 variance request and the reporting requirements in the Commission’s January 13, 2025 Order. All three volumes end with an identical set of decision options.

RELEVANT DECISIONS

Regarding 2024 electric IOU service quality as displayed in Volume 2, the necessary decisions are thus:

- 1) Whether the IOUs complied with the reporting requirements; and
- 2) Therefore, whether the SRSQ reports can be approved by the Commission.

The fundamental decision option for Volume 2 is **Decision Option 1**, which both the Department and Commission Staff recommend adoption.

PARTIES

The following parties commented in the dockets:

- Department of Commerce – Division of Energy Resources (“Department”)
- BOMA Greater Minneapolis (“BOMA”)

2024 SRSQ COMPLIANCE WITH MINN. RULE

The electric IOUs met all of the reporting requirements in Minnesota Rule unless noted otherwise, which corresponds to **Decision Option 1**. Minn. Rules require certain data to be reported as part of utilities’ annual Service Quality report. Table 1 lays out all of the service quality reporting requirements in Minnesota Rule:

¹ In Docket No. 25-28, Dakota Electric Association filed a SRSQ report as an informational courtesy. The Commission is not required to make a decision upon the report. The docket has been administratively closed.

² [Minn Rules 7826 Electric Utility Standards](#).

m Staff Briefing Papers for Docket Nos. E-002/M-25-27 (Xcel); E-015/M-25-29 (MP); E-015/M-25-30 (OTP)
(Item ***6 on February 19, 2026)

Table 1: SRSQ Reporting Requirements in Minn. Rule 7826

Minnesota Rule Number	Minnesota Rule Title	Reporting Requirements
7826.1500	Involuntary Disconnections	The number of customers who received disconnection notices
		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
		The total number of customers whose service was disconnected involuntarily and the number of these customers restored to service within 24 hours
		The number of disconnected customers restored to service by entering into a payment plan
7826.1400	Meter-Reading Performance	The number and percentage of customer meters read by utility personnel
		The number and percentage of customer meters self-read by customers
		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
		Data on monthly meter-reading staffing levels, by work center or geographical area
7826.1600	Service Extension Response Times	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
		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
7826.1700	Call Center Response Times	A detailed report on call center response times, including calls to the business office and calls regarding service interruption, including a month-by-month breakdown of this information
7826.1800	Emergency Medical Account Status	The number of customers who requested emergency medical account status under Minnesota Statutes, section 216B.098 , subdivision 5
		The number of applications granted

m Staff Briefing Papers for Docket Nos. E-002/M-25-27 (Xcel); E-015/M-25-29 (MP); E-015/M-25-30 (OTP)
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		The number of applications denied and the reasons for each denial
7826.1900	Customer Deposits	The number of customers who were required to make a deposit as a condition of receiving service
7826.2000	Customer Complaints	The number of complaints received
		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
		The number and percentage of complaints resolved upon initial inquiry, within ten days, and longer than ten days
		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
		The number of complaints forwarded to the utility by the Commission's Consumer Affairs Office (CAO) for further investigation and action

2024 SRSQ REPORTING METRICS

Staff has organized this section in the following manner:

- 1) A summary of the Minn. Rule reporting requirement
- 2) Results of reporting by utility – Xcel, MP, and OTP, in that order
- 3) Staff analysis of each utilities’ SRSQ performance
- 4) Where relevant, a follow-up on issues that Staff flagged in the 2023 SRSQ reporting year briefing papers

I. Involuntary Disconnections

Minn. Rule 7826.1500. The number of customers who:

- *Received disconnection notices*

m Staff Briefing Papers for Docket Nos. E-002/M-25-27 (Xcel); E-015/M-25-29 (MP); E-015/M-25-30 (OTP) (Item ***6 on February 19, 2026)

- *Sought Cold Weather Rule protection under Minn. Stat. § 216B.096³*
- *Service was disconnected involuntarily and the number of these customers restored within 24 hours*
- *Disconnected customers restored to service by entering into a payment plan.*

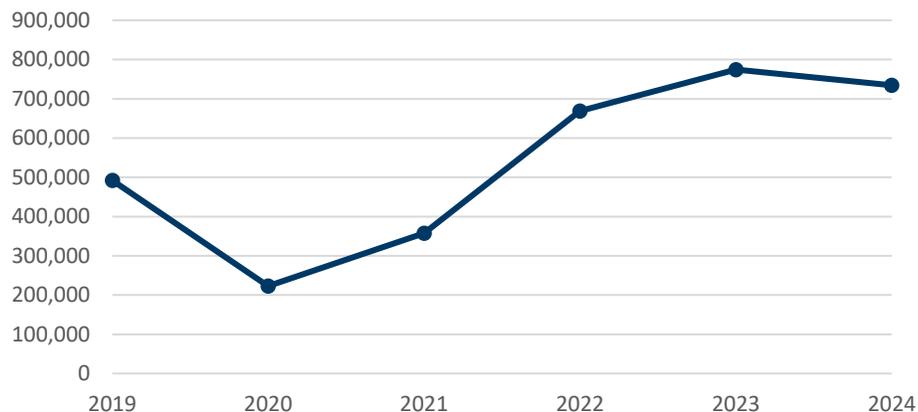
A. Xcel

Note that Vol. 3 of the briefing papers will discuss Xcel’s involuntary disconnections as well.

Disconnection Notices

In 2024, 734,696 residential customers received disconnect notices out of a total of more than 1.23 million residential customers. This kept steady from 2023. While keeping in mind that many customers received more than one disconnection notice in 2024, if every residential customer received only one, approximately 60% of Xcel’s residential customers would have received a disconnection notice.

Figure 1: Number of Xcel Customers Receiving Disconnection Notices (2019-2024)



Cold Weather Rule Protections

In 2024, 118,059 Xcel customers requested Cold Weather Rule protection, and all were granted protection.⁴ This was a slight decrease in requests from last year, but it is typical for Xcel to

³ [Minn. Stat. § 216B.096 Cold Weather Rule; Public Utility](#). The Cold Weather Rule period is from October 1 through April 30 of the following year.

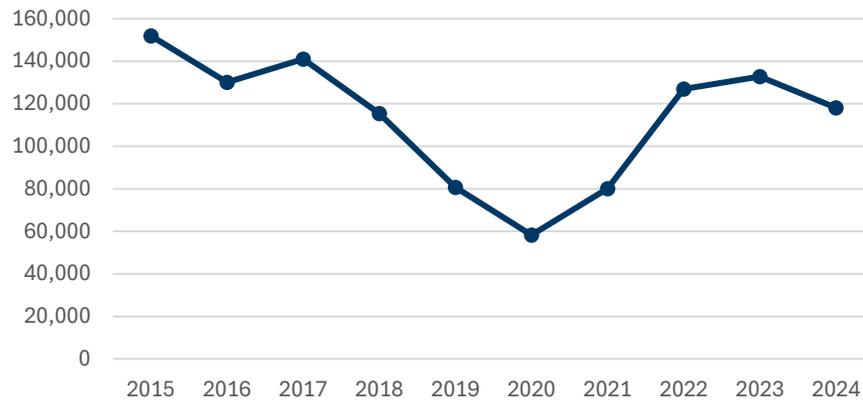
Subd. 5. **Cold weather rule.**

(a) During the cold weather period, a utility may not disconnect and must reconnect utility heating service of a customer whose household income is at or below 50 percent of the state median income if the customer enters into and makes reasonably timely payments under a mutually acceptable payment agreement with the utility that is based on the financial resources and circumstances of the household; provided that, a utility may not require a customer to pay more than ten percent of the household income toward current and past utility bills for utility heating service.

⁴ Xcel SRSQ Report, Part 1 of 3, April 1, 2025, Attachment E.

grant all requests.

Figure 2: Number of Cold Weather Rule Protections Xcel Granted (2015-2024)



Disconnected Involuntarily and Restored

The number of involuntary disconnections to Xcel customers has more than doubled between 2023 to 2024, up to 52,549 customers from 24,722 customers.⁵ In 2024, 7.15% of residential customers were disconnected; in 2023, 3.19% of residential customers were disconnected. As shown in the graph below, disconnections have skyrocketed since 2020, coinciding with the end of the disconnection moratorium in August 2021, economic strain on households following the pandemic, and the penetration of AMI meters that allow remote disconnection in 2024.

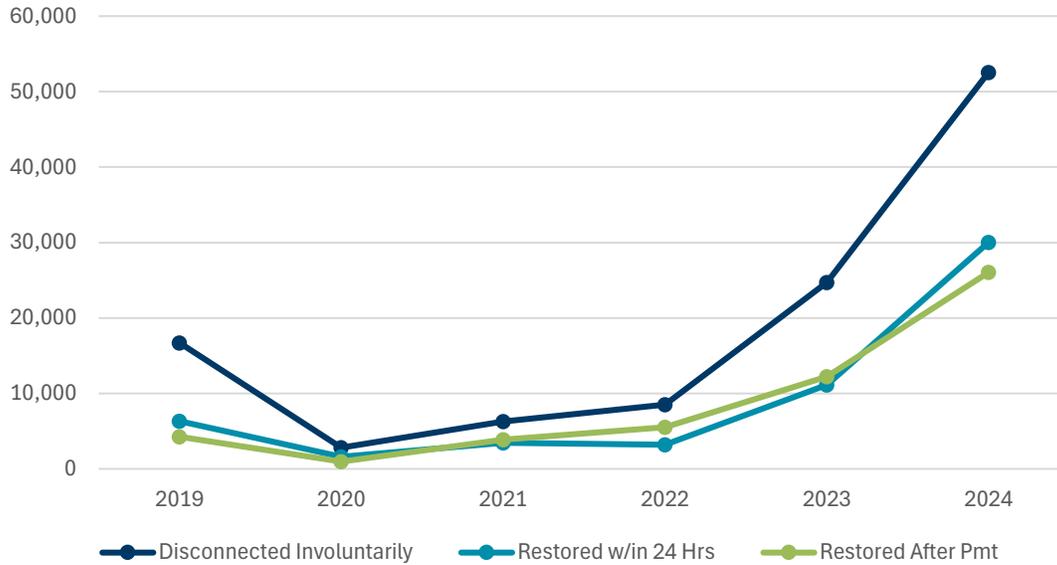
In response to Commission Order,⁶ Xcel states that the number of customers who became eligible for disconnection (defined as customers whose due date of their disconnection notice has passed) in 2024 was 375,049, of which 2,757 then paid their account in full (0.7% of customers eligible for disconnection).⁷

⁵ Xcel SRSQ Report, Part 1 of 3, April 1, 2025, Attachment E.

⁶ Docket No E002/M-22-233, *In the Matter of a Petition by Northern States Power Company Requesting Approval of Changes to its Tariff an Indefinite Variance to Commission Rules Regarding Disconnection of Service*, [Order \(March 22, 2023\)](#), Order Point 5.B.

⁷ Xcel SRSQ Report, Part 1 of 3, April 1, 2025, p. 22.

Figure 3: Xcel Residential Disconnections and Restorations (2015-2024)



The zip codes that experienced the most disconnections in 2024 were:

Table 2: Xcel’s Top 3 Zip Codes with the Most Disconnections in 2024⁸

Zip Code	Approximate Location	Number of Disconnections
55106	Eastern side of St. Paul, including the Dayton’s Bluff, Battle Creek-Highwood, and Greater East Side neighborhoods	2,015
55404	Central and southern areas of Minneapolis, including the Phillips and Whittier neighborhoods	1,872
55408	Southwestern area of Minneapolis, including the Uptown neighborhood	1,749

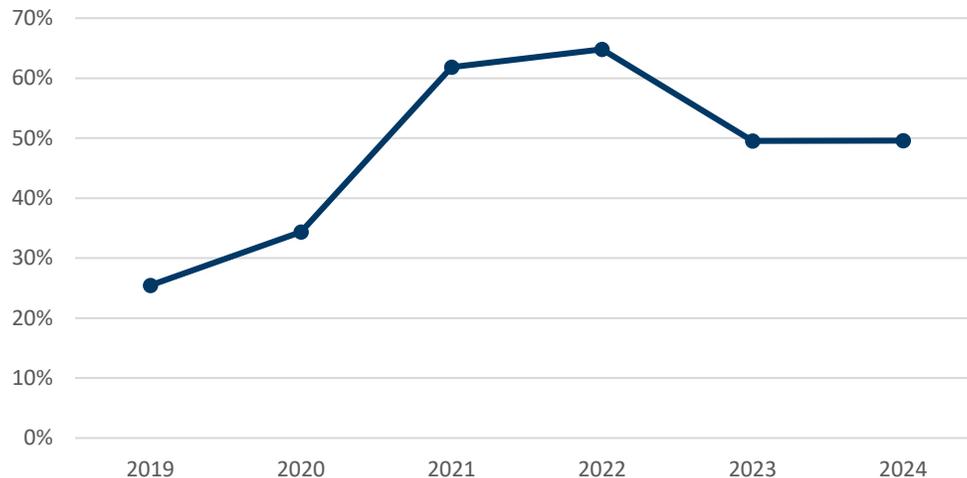
More than 30,000 customers were reconnected within 24 hours, which is approximately 3/5ths of all disconnections.

Restored with a Payment Plan

Approximately 50% of Xcel’s customers were restored after an involuntary disconnection, because they entered into a payment plan of some type. This likely means that the other 50% restored their bill in full.

⁸ 24-2 Xcel CWR Report, December 2024.

Figure 4: Xcel Residential Customers Restored with a Payment Plan (2019-2024)⁹



Many customers utilize affordability programs, which are offered to payment-burdened customers to mitigate increased arrears and the risk of disconnections.¹⁰ The qualifier for affordability programs is receiving Low-Income Home Assistance Program (LIHEAP) grants.¹¹ The majority of programs offer households a monthly bill credit and past-due bill forgiveness.

Xcel offers the following programs:

- PowerON
- Medical Electric Affordability Program (MEAP)
- Low-Income Discount (LID)
- Low-Usage Affordability Credit (LUAC)¹²

⁹ Xcel SRSQ Report, Part 1 of 3, April 1, 2025, Attachment E.

¹⁰ [Minn. Stat. § 216B.16, Subd. 15: Low-income affordability programs.](#)

¹¹ With the entire federal LIHEAP staff laid off, combined with the [Department of Health and Human Services budget proposal for FY2026 to eliminate LIHEAP funding](#), under the rationale that, “LIHEAP has not demonstrated that it has a meaningful impact on self-sufficiency, has a history of fraud and abuse, and does not serve a necessary federal role since many states have policies preventing utility disconnection,” the existing process for verifying eligibility for utility affordability programs is facing changes. On July 11, 2025, the Commission initiated an investigative docket (25-218) to explore alternative methods to prove low-income eligibility for utility affordability programs if LIHEAP is discontinued; the proceedings of which are ongoing. For the 2025-2026 heating season, LIHEAP has been funded through a continuing resolution. At the end of January 2026, Minnesota received 100% of its FFY26 LIHEAP award.

¹² In Order Point 63 of the Commission’s July 17, 2023 Order in the Xcel 2021 Rate Case, the Commission required Xcel to implement the Low Income Low Usage (LILU) program. The Commission approved Xcel’s LILU tariff modification in [its February 9, 2024 Order](#). The LILU, now renamed the Low-Usage Affordability Credit (LUAC), is a program for residential customers at or below 50% of the state median income guideline with an annual average monthly usage of 300 kWh or less. The program provides a 35% discount per kWh paid on the following month’s bill. Customers with the required income level and usage history will be automatically enrolled in the LUAC.

- Automatic Bill Credits (ABC)¹³

In addition, Xcel states that it regularly attends community events across Minnesota to assist customers who have questions about their bills, need to set up a payment arrangement, or require assistance filling out an energy assistance application.¹⁴

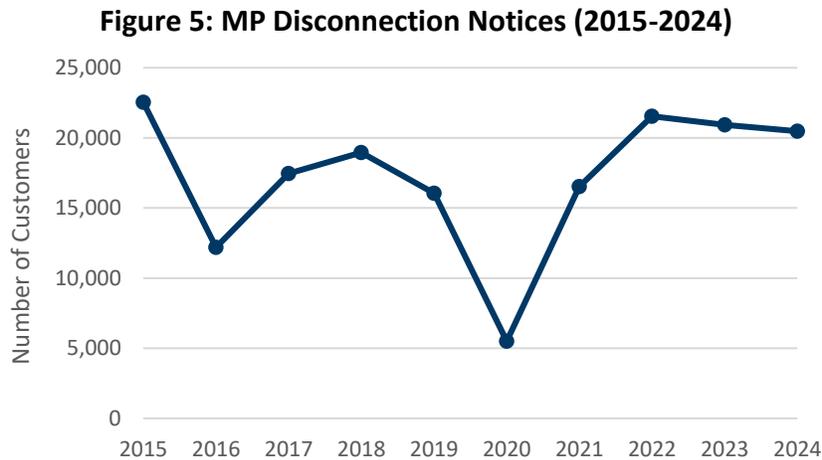
Table 3: Metric Monitored in Xcel’s 2024 Report re: Involuntary Disconnections

Metric from the 2023 Report to be Monitored	Results from the 2024 Report
Xcel’s involuntary disconnections in 2023 and continuing into 2024 are much higher than in the past.	Xcel’s involuntary disconnections grew even higher in 2024 and continued to grow into 2025. Staff will continue monitoring Xcel’s disconnection numbers in future SRSQ and other dockets.

B. MP

Disconnection Notices

MP sent a total of 21,748 disconnection notices in 2024, 94.2% of which were sent to residential customers.¹⁵ 19% of residential customers received a disconnection notice. Most notices were sent in May and October – bracketing CWR.¹⁶ Overall, the number of disconnection notices sent have stayed steady for the past three years:



¹³ [Xcel received approval from the Commission](#) to conduct a two-year pilot, which offers a bill credit to households in 77 Census Block Groups (CBGs) that Xcel estimates have energy burdens above 4%. The pilot was designed by the Equity Stakeholder Advisory Group (ESAG) convened by Xcel between 2022-2024, and which is intended to reduce energy burden of Xcel Energy’s electric customers, and to measure any other tangible benefits (e.g. reduction in arrears) that may be a result of the pilot. Xcel filed its [first bi-annual report on November 26, 2025](#), in which it described progress so far, and its work with its evaluation consultant to measure the impact of the program.

¹⁴ Xcel SRSQ Report, Part 1 of 3, April 1, 2025, p. 20.

¹⁵ 25-29 Department Initial Comments, July 11, 2025, p. 19.

¹⁶ MP SRSQ Report, April 1, 2025, p. 83.

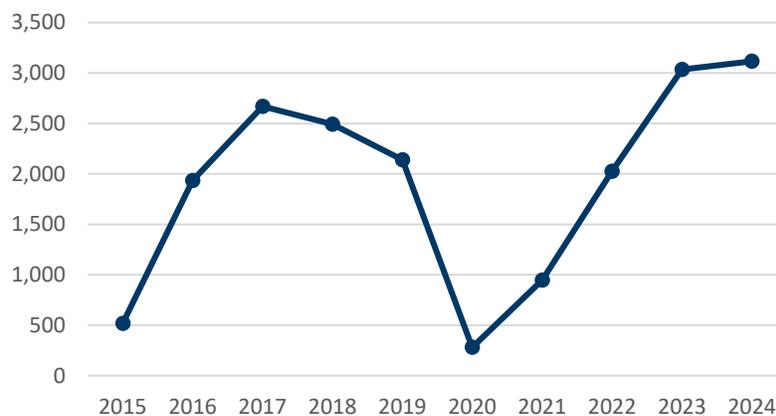
Cold Weather Rule Protections

100% of customers seeking CWR protections were granted. The majority of residential customers sought and were granted CWR protection in October 2024.¹⁷

Disconnected Involuntarily and Restored

3,116 residential customers were disconnected in 2024. The number of involuntary disconnected customers stayed steady from 2023.

Figure 6: Number of MP Customers Involuntarily Disconnected (2015-2024)



The zip codes that experienced the most disconnections in 2024 were:

Table 4: MP’s Top 3 Zip Codes with the Most Disconnections in 2024¹⁸

Zip Code	Approximate Location	Number of Disconnections
55037	Hinckley and surrounding communities in Pine County, including portions of the Mille Lacs Band reservation	269
55072	Sandstone and Marksville and surrounding communities in Pine County, including portions of the Mille Lacs Band reservation	230
55614	Silver Bay and Little Marais and surrounding communities in Lake County	185

The percentage of disconnections restored within 24 hours have been increasing over the last ten years.¹⁹ Remote-capable LIHEAP customers reconnect the fastest at just under 40

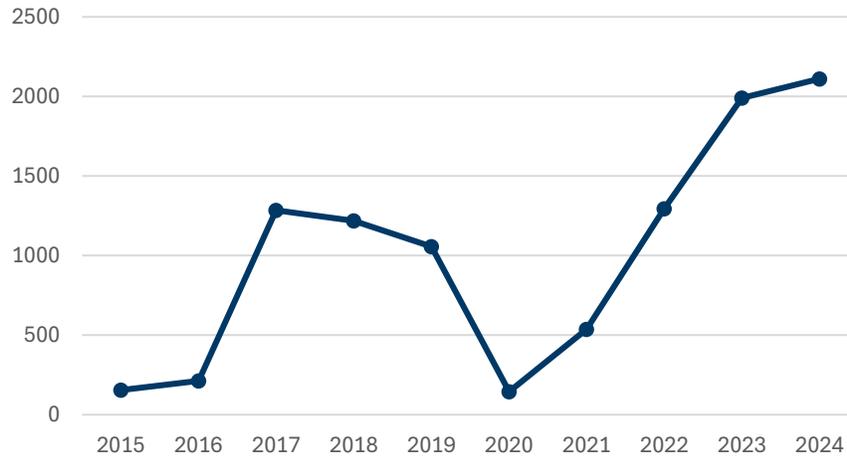
¹⁷ MP SRSQ Report, April 1, 2024, Figure 19, p. 84.

¹⁸ 24-2 MP CWR Report, December 2024.

¹⁹ 25-29 Department Initial Comments, July 11, 2025, p. 19.

seconds.²⁰

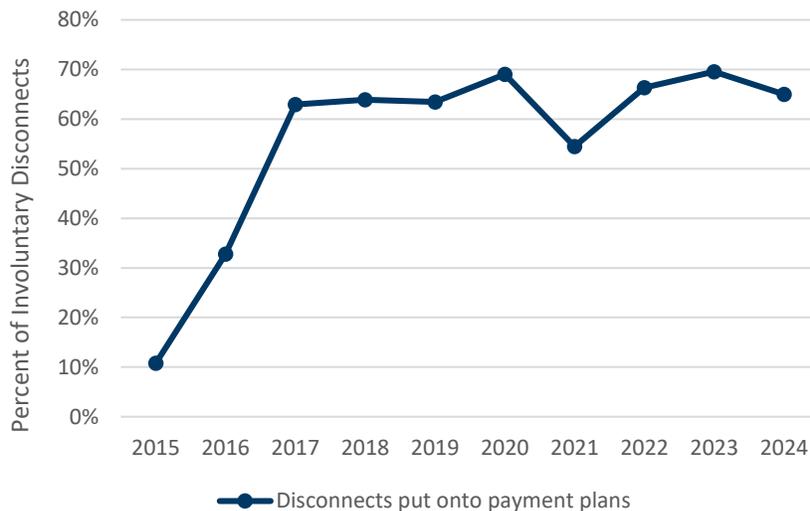
Figure 7: Number of MP Customers Restored within 24 Hours (2015-2024)



Restored with a Payment Plan

The number of customers restored with a payment plan has stayed steady since 2016, excepting the disconnection moratorium during the pandemic.²¹ 65% of MP’s involuntarily disconnected customers were restored with a payment plan.

Figure 8: MP Customers Restored with a Payment Plan (2015-2025)



MP operates its Customer Affordability of Residential Electricity (CARE) program, which is recognized as being very effective. It provides an automatic \$20 monthly discount for all of its

²⁰ 25-29 Department Initial Comments, July 11, 2025, p. 30.

²¹ 25-29 Department Initial Comments, July 11, 2025, Table 19, p. 19.

LIHEAP customers.^{22,23} MP also applies its Income- and Usage-Qualified Discount to bills of customers who are income-qualified, use an average of less than 1,000kWh per month, and have self-declared their income at below 60% of the State Median Income (SMI).²⁴

Docket 19-766 – Remote Reconnect Pilot

The Commission approved MP’s Remote Reconnect Pilot program in 2020 and set annual reporting requirements to be included in MP’s SRSQ reports.²⁵ The pilot is currently approved until July 2026. Participation in the Pilot increased overall but participation from LIHEAP customers decreased in 2024. The net program costs have decreased since 2023. The portion of reconnections performed remotely has increased over the last four years, at 68.59% in 2024. The average time to reconnect increased from 2023 with LIHEAP remote-capable customers being reconnected the quickest at 40 seconds from customer request.²⁶ Also, remote reconnections have led to a change in the Labor-Vehicle cost assumptions due to contract wage increases by approximately \$20 per reconnection.²⁷

C. OTP

Disconnection Notices

In 2024, 52,448 OTP customers received disconnection notices, 92% of which were residential customers.²⁸

Figure 9: OTP Residential Customers Receiving Disconnection Notices (2015-2024)



²² 11-409 ECC Initial Comments, April 30, 2025, pp. 3-5.

²³ Following a stakeholder group as ordered by the Commission, MP is proposing a 15% base increase to CARE and a budget escalator that would match approvals in future rate cases. These proceedings are ongoing.

²⁴ MP SRSQ Report, April 1, 2025, p. 99.

²⁵ Docket No. E-015/M-19-766, *In the Matter of Minnesota Power’s Reconnect Pilot Program*, [Order \(December 9, 2020\)](#).

²⁶ 25-29 Department Initial Comments, July 11, 2025, pp. 28-30.

²⁷ MP Reply Comments, July 25, 2025, p. 2.

²⁸ OTP SRSQ Report, April 1, 2025, Table 24, p. 51.

Cold Weather Rule Protections

In 2024, 843 customers sought CWR protection, and 757 were granted it (89.8%). Prior to 2019, 99% of customers were granted CWR protection. Since then, it has been somewhere between 80-89%.

Figure 10: OTP Customers Seeking CWR Protection vs. Customers Granted CWR Protection



Some customers opted for an alternative payment option or obtained payment assistance, but the greatest deviation between CWR sought and CWR granted was due to “having to access the CWP form within our customer information system to begin our CWP discussion with the customer on the monthly amount of their CWP amount.”²⁹ Staff is unsure what this means and asks for OTP to explain why its customer service staff would not have access to the CWP form in its 2025 SRSQ report.

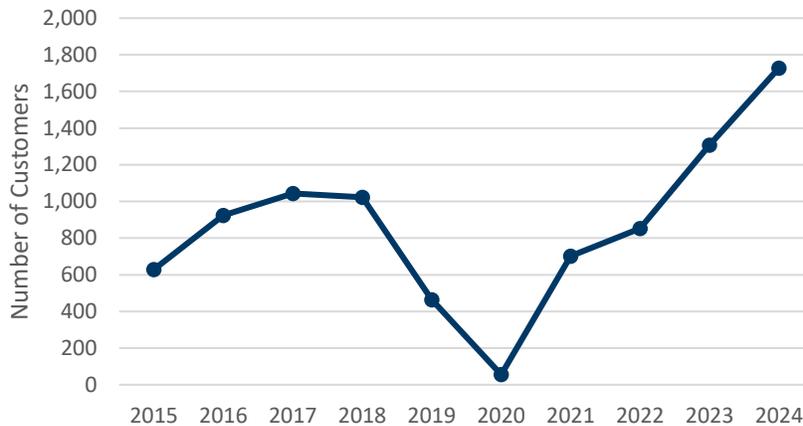
Disconnected Involuntarily and Restored

1,728 OTP customers were involuntarily disconnected in 2024. (Only 3.29% of disconnection notices were acted upon.) The number of customers involuntarily disconnected has increased over the past six years.³⁰

²⁹ OTP SRSQ Report, April 1, 2025, p. 52. OTP uses the acronym “CWP” for Cold Weather Rule Protection.

³⁰ 25-30 Department Initial Comments, July 11, 2025, p. 24.

Figure 11: OTP Customers Involuntarily Disconnected (2015-2025)



The zip codes that experienced the most disconnections in 2024 were:

Table 5: OTP’s Top 3 Zip Codes with the Most Disconnections in 2024³¹

Zip Code	Approximate Location	Number of Disconnections
56136	Hendricks and surrounding rural areas in Lincoln County	432
56142	Ivanhoe and surrounding rural areas in Lincoln County	308
56149	Lake Benton and Lake Benton Township in Lincoln County	218

51.1% of customers were restored within 24 hours.³² This metric has stayed approximately steady since 2021.

Restored with a Payment Plan

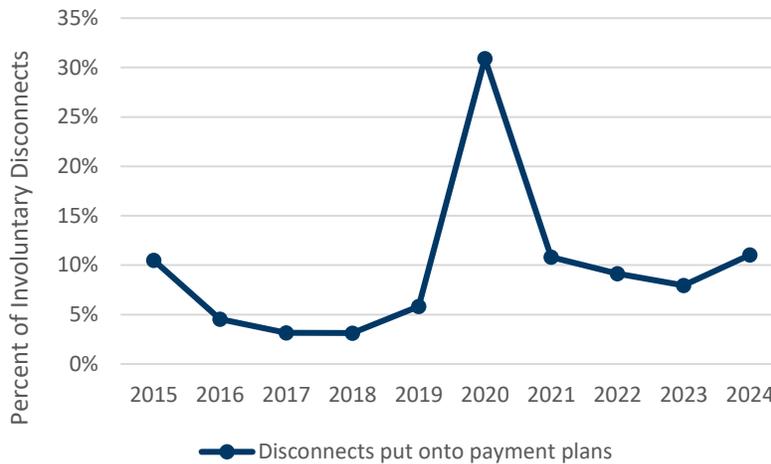
191 customers were restored by entering into a payment plan, or 11% of total involuntary disconnections.³³ When comparing this metric with Xcel (50%) and MP (65%), 11% is quite low. Staff is unsure why so few of OTP’s customers entered into a payment plan to be reconnected and would like to know more in its next SRSQ report.

³¹ 24-2 MP CWR Report, December 2024.

³² 25-30 Department Initial Comments, July 11, 2025, Table 9, p. 23.

³³ OTP SRSQ Report, April 1, 2025, Table 27, p. 54.

Figure 12: OTP Customer Restored with a Payment Plan (2015-2025)



OTP operates its Uplift affordability program, which offers bill credits of \$15, \$25, or \$40 based on a customer’s electricity usage.

Table 6: Metric Monitored in OTP’s 2024 Report re: Involuntary Disconnections

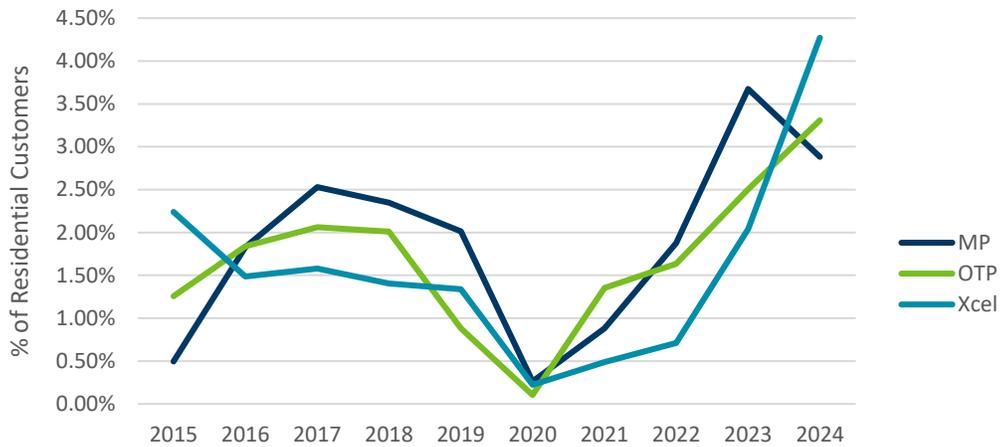
Metric from the 2023 Report to be Monitored	Results from the 2024 Report
In 2023, less than 8% of OTP’s restorations after a shutoff were done by entering into a payment plan. This is a further decrease from 2022. Staff will continue to monitor this metric in OTP’s 2024 SRSQ report.	In 2024, the number of restorations grew slightly to 11%, but this is still low compared to the other utilities. Staff will continue to monitor this metric.

D. Comparison of Utilities

Disconnected Involuntarily and Restored

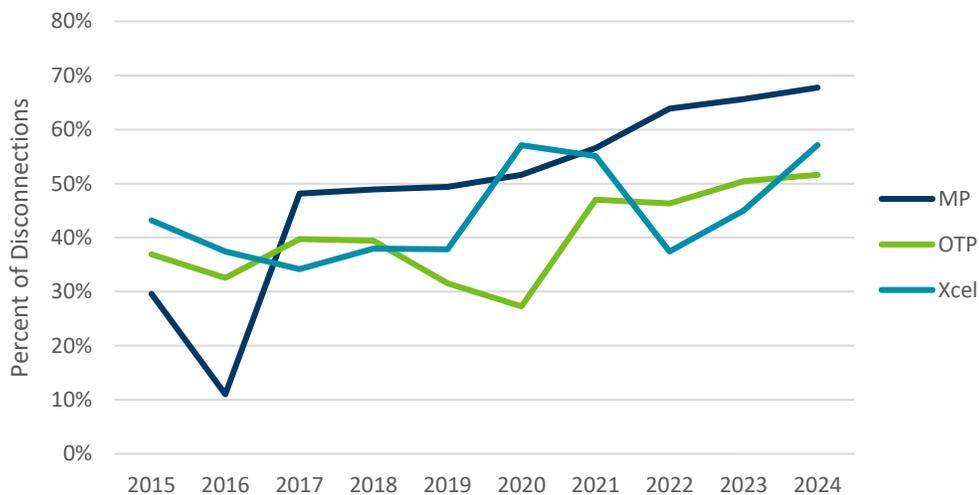
In 2024, MP disconnected 2.9% of its residential customers, OTP disconnected 3.3%, and Xcel disconnected 4.3%. Overall, disconnections have been on the rise since the pandemic and have now exceeded pre-pandemic levels.

Figure 13: Electric Utilities’ Involuntary Disconnections (2015-2024)



In 2024, OTP restored 52% of all involuntary disconnections within 24 hours, 57% of Xcel’s disconnections, and 68% of MP’s disconnections. Since 2015, restorations within 24 hours after involuntary disconnections have consistently risen from approximately 30-45% to 50-70%.

Figure 14: Electric Utilities’ Involuntary Disconnections Restored within 24 Hours

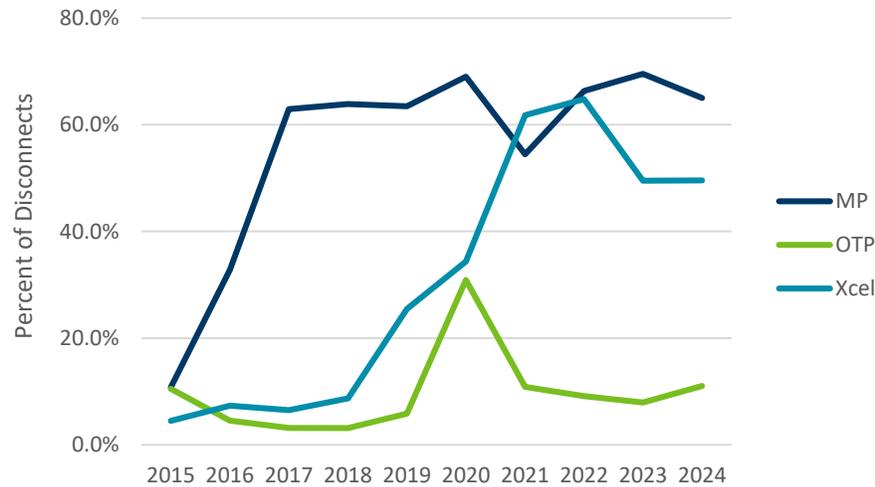


Restored with a Payment Plan

In 2024, 11.1% of OTP’s involuntary disconnections were restored with a payment plan, 49.6% of Xcel’s disconnections, and 65% of MP’s disconnections. In 2015, approximately 10% or less of disconnections were restored to service by entering into a payment plan. In the past decade, payment agreements have become much more common.

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(Item ***6 on February 19, 2026)

Figure 15: Electric Utilities' Restorations with a Payment Plan



II. Meter Reading Performance

Minn Rule 7826.1400. The number and percentage of customer meters:

- Read by utility personnel
- Self-read by customers
- Not been read by utility personnel for periods of 6-12 months and for periods longer than 12 months (and an explanation)

And data on monthly meter-reading staffing levels.

Minn Rule 7826.0900. 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.³⁴

A. Xcel

Read by Utility Personnel

Xcel achieved 99.8% readership of customer meters in 2024.

³⁴ [Minn. Rule 7826.0900 Meter Reading Frequency; Customer Accommodation, Subpart 1.](#)

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.

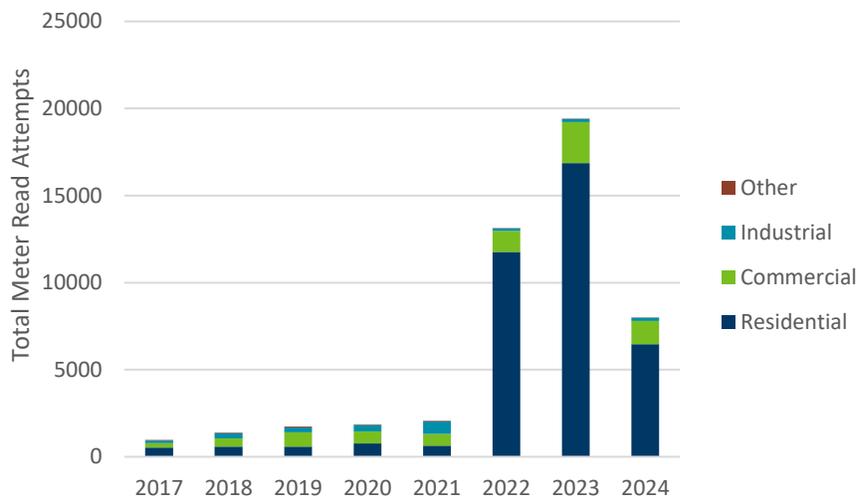
Self-Read by Customers

A very small percentage of Xcel’s meters were self-read by the customer.³⁵

Not Read by Utility Personnel

While the number of meters not read (3,980) was higher than the five year average (2,457), the Company projected that those numbers would decrease due to dissemination of AMI meters.³⁶ The Department agreed that this was likely.³⁷ As demonstrated by Figure 16, the number of meters unread for 12+ months has already decreased in 2024:

Figure 16: Xcel Meters Unread for 12+ months



Docket 22-162 – Xcel’s 2021 SRSQ Requirement on Meter Reporting

*Order Point 6. Required Xcel Energy to provide, beginning with its April 1, 2023 service quality filing, an additional data set that reports discreet meters unread for 6-12 months and 12+ months, with a single meter listed in the longest appropriate category only, in Xcel Energy’s reporting under MN Rules Section 7826.1400. To the extent possible, include historic data in this format as well, with the past five years being optimal.*³⁸

As for staffing, overall headcount remained consistent from 2023, but workstations shifted due to reallocation of staff resources.³⁹

³⁵ Xcel SRSQ Report, Part 1 of 3, April 1, 2025, Attachment C.

³⁶ Xcel SRSQ Report, Part 1 of 3, April 1, 2025, p. 3. Xcel estimates that approximately 200,000 legacy meters remain to be replaced by AMI meters, out of approximately 1.3 million total customer meters eligible for AMI.

³⁷ 25-27 Department Initial Comments, p. 32.

³⁸ Docket No. E-002/M-22-162 et al, In the Matter of Northern States Power Company d/b/a Xcel Energy’s 2021 Safety, Reliability, and Service Quality Report, [Order \(November 9, 2022\)](#), Order Point 6.

³⁹ Xcel SRSQ Report, Part 1 of 3, April 1, 2025, p. 6; Department Initial Comments, July 11, 2025, p. 33.

m Staff Briefing Papers for Docket Nos. E-002/M-25-27 (Xcel); E-015/M-25-29 (MP); E-015/M-25-30 (OTP) (Item ***6 on February 19, 2026)

Table 7: Metric Monitored in Xcel’s 2023 Report re: Meter Reading Performance

Metric from the 2023 Report to be Monitored	Results from the 2024 Report
Xcel’s meters not read for 6-12 months and 12+ months have greatly increased since 2022. Staff will monitor whether meters not read for an extended period of time is a continuing trend.	The number of unread meters decreased in 2024. It is presumed that this number will continue to decrease in 2025 SRSQ due to AMI deployment.

B. MP

Read by Utility Personnel

99% of all customers meters were read by utility personnel.⁴⁰ MP retains six meter reading staff.

Self-Read by Customers

No meters were self-read by customers as MP ended this practice in 2023, which coincided with the completion of its AMI rollout.⁴¹

Not Read by Utility Personnel

Eight meters were not read for 6-12 months; seven meters were not read by 12+ months.⁴² Customers with unread meters are left with reminder notices at the premises, are sent reminder letters, and are called to schedule meter readings. A disconnection notice is issued, but disconnections for unread meters are not performed during CWR season.

C. OTP

Read by Utility Personnel

98.3% of OTP’s meters were read by utility personnel.⁴³ OTP’s meter reading performance has stayed steady over the years. OTP retained approximately 50 staff that performed meter reading duties in 2024. In addition, OTP engaged third-party contractors to perform meter reading. OTP completed its AMI installation, so now meter readings have begun to be transmitted directly.⁴⁴

Self-Read by Customers

0.4% of meters were self-read by OTP customers.

⁴⁰ MP SRSQ Report, April 1, 2025, p. 71.

⁴¹ MP SRSQ Report, April 1, 2025, p. 73.

⁴² 25-29 Department Initial Comments, July 11, 2025, p. 18.

⁴³ OTP SRSQ Report, April 1, 2025, Table 19, p. 45.

⁴⁴ 25-30 Department Initial Comments, July 11, 2025, pp. 22-23.

Not Read by Utility Personnel

1.3% of meters went unread by OTP.

III. Service Extension Request Response Times

Minn. Rule 7826.1600. 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*
- *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*

A. Xcel

Locations Not Previously Served

Xcel performed nearly 7,000 new service installations in 2018. They took an average of 30 days to complete.

Figure 17: Total Number of Xcel Requests to Locations Previously Unserved (2018-2024)

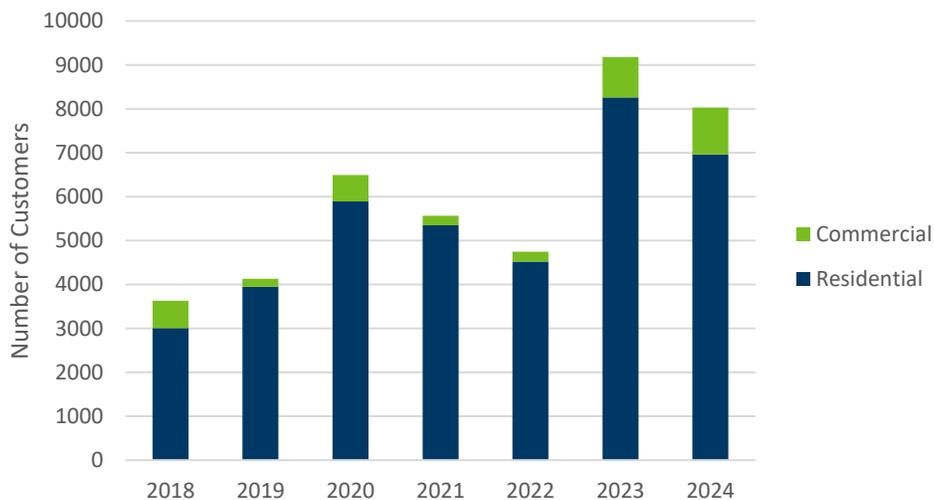
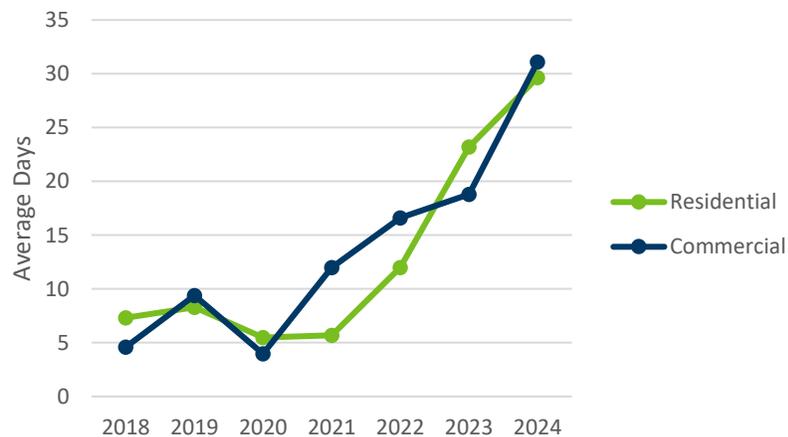


Figure 18: Xcel Average Days to Extend Service to Locations Previously Unserved (2018-2024)



Xcel stated that the increase in average days to complete a new service installation is due to ongoing supply chain issues, inflation, as well as internal data issues.⁴⁵ Specifically, Xcel noted that ongoing supply chain issues with 34.5 kV distribution voltage equipment were a top cause of delay in the Northwest part of its territory. To mitigate this, Xcel brought on an additional supplier. In addition, Xcel referenced internal data management inaccuracies – which caused confusion about when a site was ready to accept service or when it had been completed – as another top cause of delay. Xcel stated that, since identifying this issue in 2024, it has provided increased training to employees at work service centers where this issue is most prevalent.

Previously Served Locations

In 2024, Xcel performed approximately 18,200 service extension requests for locations that were previously served. The average days to start service at a location where service previously existed was much shorter: with 17,827 residential and 484 commercial customers, it took an average of 1 day.⁴⁶

B. MP

Locations Not Previously Served

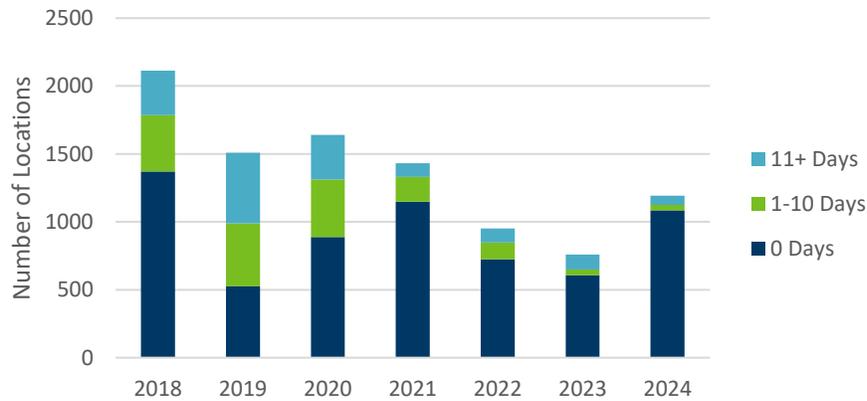
MP performed 1,176 installations to locations not previously served. This has been an increase since 2022 and 2023. The time required to extend service increased accordingly. 66% were performed on the date requested by the customer.⁴⁷

⁴⁵ Xcel SRSQ Report, Part 1 of 3, April 1, 2025, pp. 11-12.

⁴⁶ Xcel SRSQ Report, Part 1 of 3, April 1, 2025, pp. 10-11.

⁴⁷ 25-29 Department Initial Comments, July 11, 2025, p. 20.

Figure 19: MP Average Days to Extend Service to Locations Previously Unserved (2018-2024)



The four largest reasons for delay were the contractor or electrician not being ready, MP’s contractor not being ready, the customer gave late notice, or MP was unable to meet the requested date. When MP is the reason for not meeting the deadline, this is due to extensive underground work needing to be done, unplanned work, needing to perform planned power outages, missing resources, and a limited number of contractors to do said work.⁴⁸

Previously Served Locations

There were 1,943 installations to locations that had been previously served by MP. 94.1% of them were performed on the requested date.

C. OTP

Locations Not Previously Served

OTP reported 295 customers who requested service at locations not previously served. 87% of those were completed within 0-2 days, which is a significant improvement, because only 37% were installed within 0-2 days in 2023.⁴⁹

Previously Served Locations

OTP performed 930 installations at locations previously served in 2024. 89.7% were completed within 0-2 days.⁵⁰

IV. Call Center Response Times

Minn. Rule 7826.1700. A detailed report on call center response times with a month-to-month

⁴⁸ MP SRSQ Report, April 1, 2025, pp. 90-94.

⁴⁹ 25-30 Department Initial Comments, July 11, 2025, p. 24.

⁵⁰ 25-30 Department Initial Comments, July 11, 2025, p. 24.

m Staff Briefing Papers for Docket Nos. E-002/M-25-27 (Xcel); E-015/M-25-29 (MP); E-015/M-25-30 (OTP)
(Item ***6 on February 19, 2026)

breakdown, including:

- *Calls to the business office*
- *Calls regarding service interruption*

Minn. Rule 7826.1200. Utilities shall answer 80 percent of calls made to the business office during regular business hours within 20 seconds. Utilities shall answer 80 percent of calls directed to the telephone number for reporting service interruptions within 20 seconds.⁵¹

A. Xcel

Calls to Business Office

Xcel utilizes the following teams to answer customers:

- Residential call center representatives (known as Customer Service Representatives or CSRs)
- Business Solutions Center (BSC)
- Credit Department
- Personal Account Representatives (PAR)
- Interactive Voice Response (IVR)

In 2024, there were a total of 3.25 million calls to the business office; 2.05 million of those were answered by IVR, not agents. In 2024, Xcel stated that an average of 79.7% of calls were answered within 20 seconds.⁵² However, the Department calculated the result was 77.53%, and this was confirmed by Staff calculations (see table 8).⁵³ On average, calls to agents were answered in less than six minutes. In November and December 2024, agents answered calls within 11 seconds, but in July 2024, agent calls weren't answered until after almost 12 minutes.

⁵¹ Minn. Rule 7826.1200 Call Center Response Time.

⁵² Xcel SRSQ Report, Part 1 of 3, April 1, 2025, pp. 12-13.

⁵³ 25-27 Department Initial Comments, July 11, 2025, p. 40.

m Staff Briefing Papers for Docket Nos. E-002/M-25-27 (Xcel); E-015/M-25-29 (MP); E-015/M-25-30 (OTP) (Item ***6 on February 19, 2026)

Table 8: Xcel Call Center Response Times^{54,55}

Non Outage Calls	Calls to Agents/IVR	Answered < 20 seconds	%
Residential - Agents	831,994	351,301	42.22%
BSC - Agents	54,019	28,251	52.30%
Credit - Agents	287,075	112,434	39.17%
PAR - Agents	48,930	28,983	59.23%
IVR	2,031,656	2,031,656	100.00%
Total	3,253,674	2,552,625	78.45%
Outage Calls	Calls to Agents/IVR	Answered < 20 seconds	%
Agents	214,748	91,551	42.63%
IVR	199,294	199,294	100.00%
Total	414,042	290,845	70.25%
All Calls		Answered < 20 seconds	
Total Calls	3,667,716	2,843,470	77.53%
Total Calls - Agents	1,436,766	612,520	42.63%
Total Calls - IVR	2,230,950	2,230,950	100.00%

Outage Calls

In 2024, there were 414,042 outage calls received by Xcel, roughly half of those were answered by IVR. Xcel assumes all IVR calls are answered within 20 seconds. Calls answered by agents are answered less quickly: 42.6% of calls were answered by agents within 20 seconds.

Met Standard of 80% of Calls in 20 Seconds

Xcel identified staffing challenges (such as a difficult hiring market)⁵⁶ and severe weather events as the main reason for call center performance not meeting the 80% threshold. Xcel also explained that it has taken steps to address hiring challenges, including increasing the starting wage from \$18 to \$20 an hour and expanding recruiting.⁵⁷

⁵⁴ Xcel SRSQ Report, Part 1 of 3, April 1, 2025, Attachment F; 25-27 Department Initial Comments, April 1, 2025, p. 40.

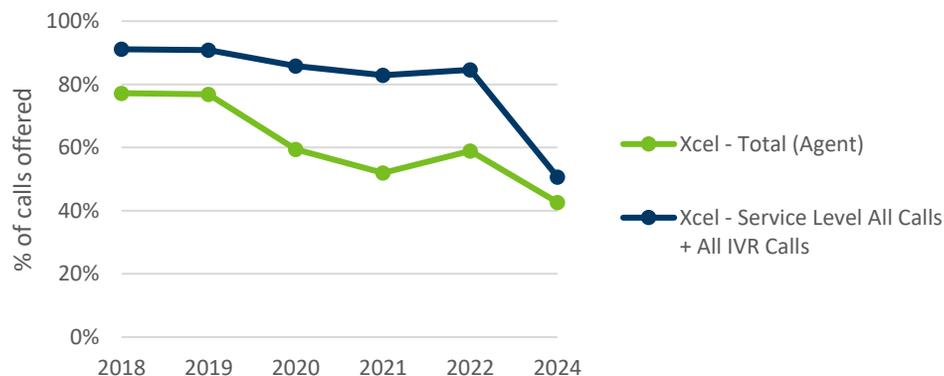
⁵⁵ Xcel SRSQ Report, Part 1 of 3, April 1, 2025, p. 12. Xcel clarified that data regarding credit calls but not calls from C&I customers were included in calculation of call center response time.

⁵⁶ Xcel Reply Comments, August 8, 2025, p. 21. Xcel stated that “the Company has seen an ongoing and increased demand for remote and hybrid roles, as well as a shrinking pool of applicants seeking a front-line customer service position.”

⁵⁷ 25-27 Department Initial Comments, July 11, 2025, p. 41.

m Staff Briefing Papers for Docket Nos. E-002/M-25-27 (Xcel); E-015/M-25-29 (MP); E-015/M-25-30 (OTP) (Item ***6 on February 19, 2026)

Figure 20: Xcel Calls Answered within 20 Seconds (2018-2024)



Docket No. 04-511 – Credit Calls

Order Point 6. Xcel shall include on a going forward basis, data regarding credit calls but not calls from C&I customers in its calculation of call center response times.⁵⁸

Multiple teams, who handle credit calls, assist customers with setting up payment arrangements. Xcel received 390,024 of these calls in 2024. 50.23% of those calls were answered within 20 seconds. Staff argues that outside of calls regarding safety and outages, these are some of the most urgent calls the Company receives.

Docket No. 12-383 – Xcel’s Quality of Service Plan (QSP)

In Xcel’s 2024 QSP report, Xcel did not meet the Telephone Response Time metric, and therefore, it incurred a \$1 million penalty for underperformance. The Commission required Xcel to use the entire penalty for \$500 bill credits to 1,000 customers who have a past due balance, have not received energy assistance, have received a disconnect notice, and have made a payment within the last 90 days.⁵⁹ Xcel stated that the bill credits will be on the customers’ next monthly statement.⁶⁰ Additionally, the Commission authorized the Executive Secretary to open a new docket under the performance-based regulatory framework in Minn. Stat. § 216B.16, subd. 19, para. (h),⁶¹ which is focused solely on improving Xcel’s customer service performance. A new docket has been opened for this proceeding – E-002, G-002/CI-26-85.

⁵⁸ Docket No. E-002/M-04-511, *In the Matter of Northern States Power Company d/b/a Xcel Energy’s Annual Safety, Reliability, and Service Quality Standards Report and Proposed Standards*, Order (November 3, 2004), Order Point 6.

⁵⁹ Docket No. E-002, G-002/M-12-383, *In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Amendments to its Natural Gas and Electric Service Quality Tariffs Originally Established in Docket No. E, G-02/CI-02-2034*, [Order \(January 9, 2026\)](#), Order Point 2.

⁶⁰ 12-383 Xcel Informational Filing, January 23, 2026, p. 5.

⁶¹ [Minn. Stat. § 216B.16 RATE CHANGE; PROCEDURE; HEARING. Subd. 19. Multiyear rate plan.](#)

(h) The commission may initiate a proceeding to determine a set of performance measures that can be used to assess a utility operating under a multiyear rate plan.

m Staff Briefing Papers for Docket Nos. E-002/M-25-27 (Xcel); E-015/M-25-29 (MP); E-015/M-25-30 (OTP)
(Item ***6 on February 19, 2026)

Xcel's Call Center Response Times

Staff recommends that Xcel be required to provide data on Call Center Response Times in the format on p. 40 of the Department's initial comments (**Decision Option 6**).⁶² Staff finds this format to be simpler and easier to analyze.

It is of note that Xcel reports "Telephone Response Time" in its QSP. Since the evaluations needed in the QSP are simpler than that in the SRSQ, Staff does not see a need to change the reporting in the QSP. Staff notes that the Commission Investigation Docket No. 26-85 was recently opened to further examine Xcel's service quality insofar as the seven metrics already in the QSP. Any changes to reporting should be decided upon in that docket.

B. MP

Calls to Business Office

Typically, MP routes customer calls through its IVR system. The first option is to report an outage, and there is another option to talk to a Call Center representative.⁶³

MP received 116,017 calls to the business office in 2024. MP met its requirement to answer 80.4% of calls to the business office within 20 seconds. November was the lowest performing month at 66%; March and April were the highest at 90%.⁶⁴

Outage Calls

MP received 15,329 outage calls in 2024, and 77.2% of those were answered within 20 seconds.

Met Standard of 80% of Calls within 20 Seconds

When combining the calls, MP barely missed the standard in 2024 (79.98%). MP cited staffing shortages, staff illnesses, and new hires needing to complete training.

C. OTP

Calls to Business Office

OTP's call center uses agents across five office locations in Minnesota, North Dakota, and South Dakota. OTP's agents answered 47,300 calls in 2024.⁶⁵ September was the lowest performing

⁶² Department Initial Comments, July 11, 2025, Table 15, p. 40.

⁶³ MP SRSQ Report, April 1, 2025, p. 98.

⁶⁴ 25-29 Department Initial Comments, July 11, 2025, p. 21.

⁶⁵ OTP SRSQ Report, April 1, 2024, p. 64.

month (64.2% of calls answered within 20 seconds), and March was the highest (93.9%).⁶⁶

Outage Calls

OTP did not provide information about outage calls.

Met Standard of 80% of Calls in 20 Seconds

At 78.2%, OTP did not meet the 80% of calls within 20 seconds requirement in 2024, likely due to difficulties hiring new CSRs and the training process. OTP stated that it will return to historic levels after training is complete.⁶⁷

V. Emergency Medical Accounts

Minn. Rule 7826.1800. The number of customers who:

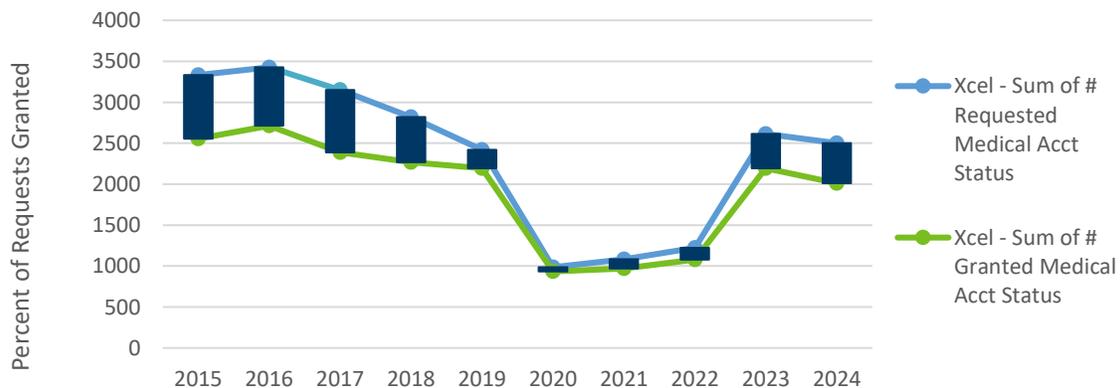
- Requested emergency medical account status under Minnesota Statutes, section [216B.098](#), subdivision 5
- Applications were granted
- Applications were denied and the reasons for each denial

A. Xcel

EMA Requests vs. Granted

In 2024, a total of 2,501 customers requested Emergency Medical Accounts (EMA) status. 2,013 customers were granted EMA status.

Figure 21: Xcel EMA Status Requested vs. Granted (2015-2024)⁶⁸



⁶⁶ 25-30 Department Initial Comments, July 11, 2025, p. 25.

⁶⁷ MP SRSQ Report, April 1, 2025, pp. 64-65.

⁶⁸ 25-27 Department Initial Comments, July 11, 2025, p. 42.

EMA Denials

19.5% of applicants (488 customers) were denied EMA in 2024. Denials were due to the customer not returning the form to Xcel or the medical professional refusing to certify that the customer qualified for support. In these instances, the customer is denied, the application is returned to the customer, and Xcel says it continues to work with the customer to remedy the outstanding application issues.⁶⁹

While the number of customers requesting and being granted EMA status has increased over the past five years, the proportion of customers being granted status has decreased over time. The number of denials has steadily grown since 2019. The Department offered that the need for customers to request and be approved for the status annually leads to “significant erosion in the number of customers with EMA status.”⁷⁰ Xcel is the only utility to offer an affordability program specifically to customers with EMA status – MEAP.

Table 9: Metrics Monitored in Xcel’s 2024 Report re: EMA

Metric from the 2023 Report to be Monitored	Results from the 2024 Report
Xcel will be implementing a “direct submit” button for emergency medical forms. Staff investigated whether implementing the “direct submit” button will reduce the number of customers denied for EMS.	Xcel said that it could not embed a direct link but made the form downloadable on its website.* <i>*For more details about Xcel’s progress adding a direct link to submit its Medically Necessary Equipment & Emergency Certification Form, see p. xx of Vol. 3 of the briefing papers.</i>

B. MP

EMA Requests vs. Granted

In 2024, 91 customers requested EMA status, and all were granted it. The program renewed 48 customers’ status and added 43 new customers. In 2024, there were 176 customers noted in the system with EMA status, and 36 were removed due to non-renewal, customer request, deceased customer, or closed account.⁷¹ There was a peak in EMA status customers in 2019 but a significant drop-off during the pandemic. The program has not rebounded since.

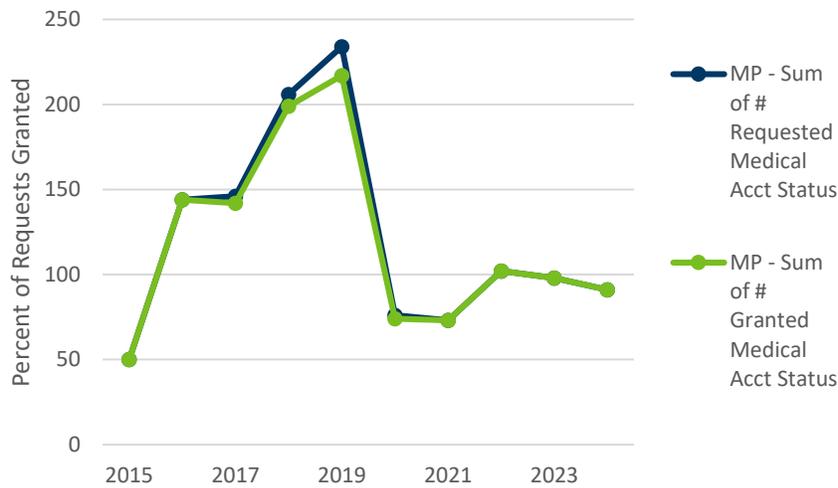
⁶⁹ Xcel SRSQ Report, Part 1 of 3, April 1, 2025, p. 15.

⁷⁰ 25-27 Department Initial Comments, p. 42.

⁷¹ MP SRSQ Report, April 1, 2025, p. 104.

Staff Briefing Papers for Docket Nos. E-002/M-25-27 (Xcel); E-015/M-25-29 (MP); E-015/M-25-30 (OTP) (Item ***6 on February 19, 2026)

Figure 22: OTP EMA Status Requested vs. Granted (2015-2024)

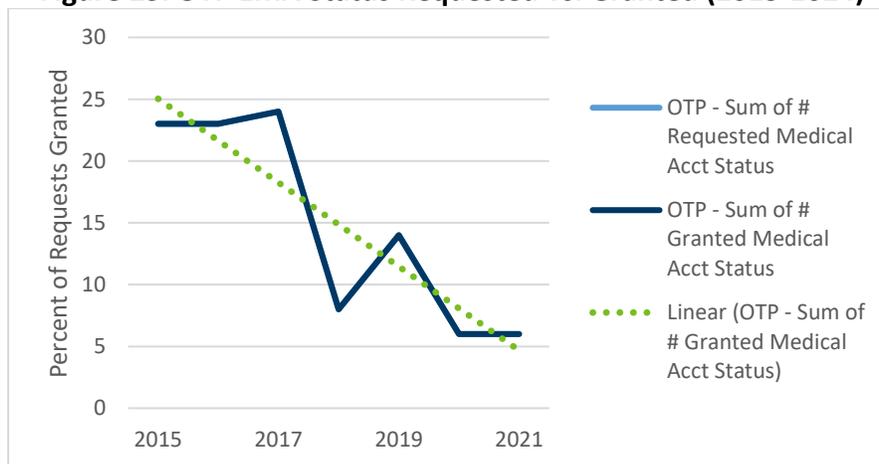


C. OTP

EMA Requests vs. Granted

In 2024, OTP had 12 customers request EMA status. All were granted status, and none were denied. This seems to be OTP’s practice. This is an increase from ten customers in 2023.⁷² There has been a steady decrease in customers with EMA status, despite OTP advertising the program.⁷³

Figure 23: OTP EMA Status Requested vs. Granted (2015-2024)



VI. Customer Deposits

Minn. Rule 7826.1900. The number of customers who were required to make a deposit as a

⁷² 25-30 Department Initial Comments, July 11, 2025, p. 26.

⁷³ OTP SRSQ Report, April 1, 2025, p. 66.

condition of receiving service.

A. Xcel

In 2024, Xcel requested 436 deposits from residential customers who have filed for bankruptcy as a condition of service. This was 7% higher than 2023, but 6% below the 10-year average. The Department finds these results to be reasonable.⁷⁴

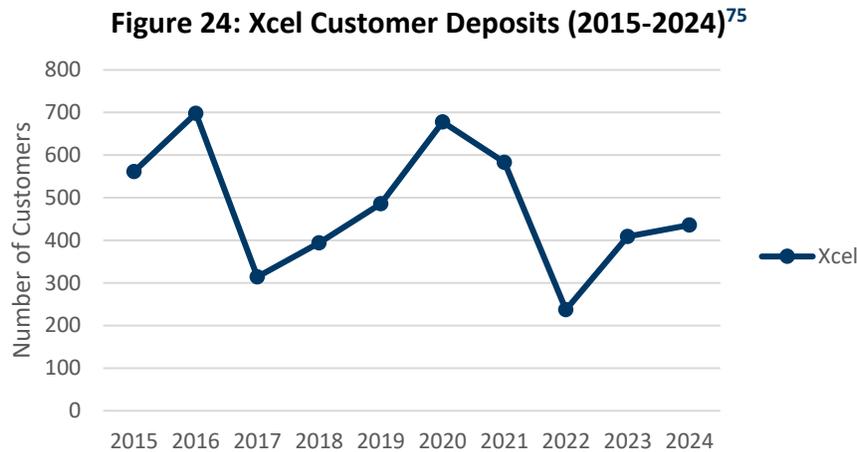


Table 10: Metrics Monitored in Xcel’s 2024 Report re: Customer Deposits

Metric from the 2023 Report to be Monitored	Results from the 2024 Report
The number of customer deposits Xcel collected increased from 237 in 2022 to 409 in 2023. Staff will continue to monitor this metric to find if the number of customer deposits collected increase again in 2024.	While the number of customer deposits required for Xcel increased between 2023-2024, 2024 was lower than the 10-year average.

B. MP

In 2024, MP did not collect any deposits from customers but may consider it in the future.⁷⁶

C. OTP

In 2024, OTP did not collect any deposits. OTP suspended customer deposits during the pandemic in 2020 but will continue to assess the need for them.⁷⁷

⁷⁴ 25-27 Department Initial Comments, July 11, 2025, p. 43.

⁷⁵ 25-27 Department Initial Comments, p. 43.

⁷⁶ MP SRSQ Report, April 1, 2025, p. 22.

⁷⁷ OTP SRSQ Report, April 1, 2025, p. 67.

VII. Customer Complaints

Minn. Rule 7820.2000. A detailed report on complaints by customer class and calendar month, including at least the following information:

- *The number of complaints received*
- *The number and percentage of complaints alleging:*
 - *Billing errors*
 - *Inaccurate metering*
 - *Wrongful disconnection*
 - *High bills*
 - *Inadequate service*
 - *Service-extension intervals*
 - *Service-restoration intervals*
 - *Any other identifiable subject matter involved in five percent or more of customer complaints*
- *The number and percentage of complaints resolved upon initial inquiry, within ten days, and longer than ten days*
- *The number and percentage of all complaints resolved by taking any of the following actions:*
 - *Taking the action the customer requested*
 - *Taking an action the customer and the utility agree is an acceptable compromise*
 - *Providing the customer with information that demonstrates that the situation complained of is not reasonably within the control of the utility*
 - *Refusing to take the action the customer requested*
- *The number of complaints forwarded to the utility by CAO for further investigation and action*

Complaints reported in the SRSQ reports come from not only CAO, but also the Better Business Bureau, the OAG, and internal complaints handled by Xcel's customer care teams.

A. Xcel

Complaints - General

In 2024, Xcel received 1,981 complaints, 1,468 of which were forwarded by the CAO.⁷⁸ CAO's records show their mediators handled 1,477 complaints from Xcel's electric customers in 2024.

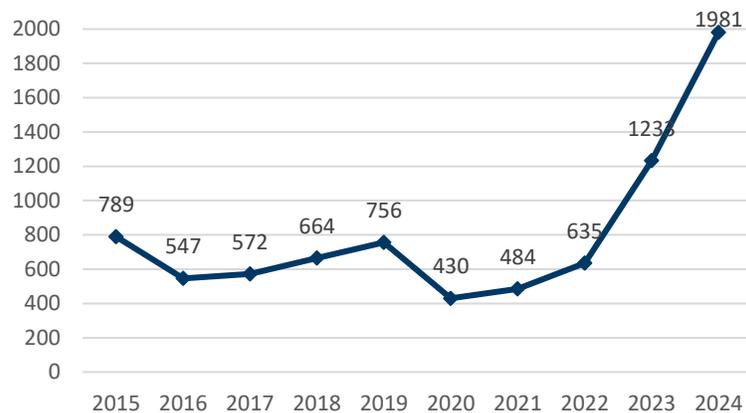
The Company provided data showing 17 percent of all complaints that Xcel's Customer Advocate Group handled in 2024 were resolved within 10 days. The most frequent complaint

⁷⁸ Xcel SRSQ Report, Part 1 of 3, April 1, 2025, Attachment G.

category was “Inadequate Service: Programs and Services” at 33.7%.

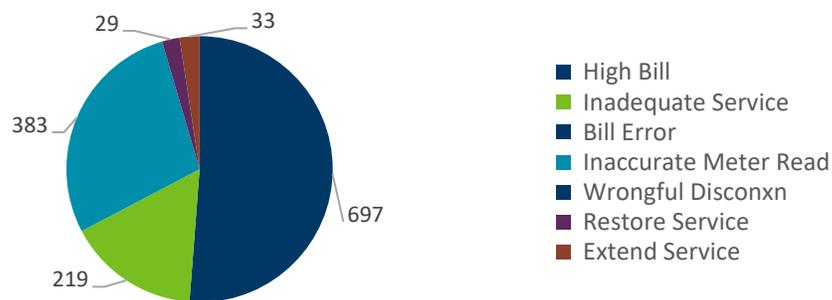
The Department noted that the number of complaints increased 60% between 2023-2024 alone, and in 2024, complaints were 181% over the five-year average.⁷⁹ The Department also highlighted that the number of complaints forwarded to the CAO have dramatically increased over the last two years, as well as compared to the five-year average.

Figure 25: Xcel’s Customer Complaints (2015-2024)⁸⁰



Most of Xcel’s 2024 complaints were in the billing category, more specifically billing and credit, which are mostly related to involuntary disconnections. Disconnections represent most of CAO’s Xcel complaints, as well.

Figure 26: Xcel Customer Complaints by Type (2024)



Complaints – Distributed Energy Resources

Order Point 6. Required Xcel Energy to add in the upcoming and subsequent reports a “DER Complaint” reporting subcategory, following discussion with and input from the Complaint

⁷⁹ 25-27 Department Initial Comments, July 11, 2025, p. 45.

⁸⁰ 25-27 Department Initial Comments, July 11, 2025, Table 18, p. 45.

working group.⁸¹

Order Point 7. Required Xcel Energy to document response duration in days, beginning from the date of initial customer contact to the date of Company reply, for inquiries, complaints, or disputes related to DERs and/or the interconnection process that are received through Xcel’s call center, email, or otherwise. Information shall be shared in a .xlsx format in the Company’s 2023 service quality filing and in the temporary annual report in Docket No. E-999/CI-16-521.⁸²

In response to Commission Order, Xcel also reported complaints about distributed energy resources (“DER”) as a subcategory. Xcel stated that these complaints include Solar*Rewards Community, Solar*Rewards, and Distributed Generation or standard Interconnection.⁸³

Table 11: Xcel’s DER Complaints

Complaint Category	Complaint Count
Billing	39
Interconnection	19
Other	8
Total Complaints	66

CAO reports receiving 68 DER complaints in 2024, not 66.

CAO is in close contact with Xcel’s ECO team and coordinate with the Department, who assist with Solar*Rewards complaints.

Docket No. 25-341 – Commission Investigation into Xcel Energy’s Residential Billing Errors

BOMA Greater Minneapolis (BOMA) – a trade association representing commercial real estate interests in Minneapolis and its suburbs – filed a comment raising concerns about Xcel’s customer service quality regarding its members’ issues.⁸⁴ BOMA also filed these comments in Xcel’s rate case dockets (E-002/GR-24-320 and E-002/M-24-321). BOMA alleged that:

Since approximately 2022, at least 23 BOMA members, many of whom own multiple buildings, have experienced issues with Xcel Energy’s customer service, largely comprised of delayed and inaccurate bills, misapplied payments, and ineffective communications and resolutions. Many of these issues stem from Xcel’s billing system and its customer service team. BOMA members have contacted Xcel

⁸¹ Docket No. E-002/M-21-237, *In the Matter of Northern States Power Company d/b/a Xcel Energy’s 2020 Electric Annual Service Quality Performance Report*, [Order \(December 2, 2021\)](#), Order Point 6.

⁸² Docket No. E-002/M-22-162 et al, *In the Matter of Northern States Power Company d/b/a Xcel Energy’s 2021 Electric Annual Report and Petition Service Quality Performance and Proposed Reliability Measures*, [Order \(November 9, 2022\)](#), Order Point 7.

⁸³ Xcel SRSQ Report, Part 1 of 3, April 1, 2025, pp. 17-18.

⁸⁴ BOMA Initial Comments, July 11, 2025.

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*Energy an extraordinary number of times seeking resolution of these issues.*⁸⁵

BOMA listed the issues that members have experienced as:

- Delayed billing and invoices
- Failure to account for net metering
- Improper payment processing

BOMA requested that the Commission initiate an investigation into the systemic issues plaguing Xcel Energy’s billing system and customer service operations, which the Commission is doing under Docket No. 25-341. By filing in Xcel’s rate case dockets, BOMA also recommended that the Commission heavily scrutinize and reduce Xcel’s request for rate increases.⁸⁶

Docket No. 12-383 – Xcel’s QSP

Xcel acknowledged that it had exceeded its Customer Complaint threshold for 2024 relative to a 2024 threshold of 383 complaints forwarded to the CAO in the QSP tariff and had incurred another \$1 million under performance penalty. Xcel’s customers registered a total of 1,468 complaints with CAO in 2024. Same as the Call Response Time metric, the Commission required Xcel to use the entire penalty for \$500 bill credits to 1,000 customers.⁸⁷ In 2025, Xcel customers filed 1,252 complaints with CAO.

Table 12: Metric Monitored in Xcel’s 2024 Report re: Customer Complaints

Metric from the 2023 Report to be Monitored	Results from the 2024 Report
Xcel is on track to exceed its customer complaint threshold in the QSP again in 2024. Staff will report on the 2024 QSP proceedings in the 2024 SRSQ briefing papers.	Xcel exceeded the QSP Customer Complaint threshold in 2024 and has already done so in 2025. This will be addressed in the 2025 QSP docket.

B. MP

MP’s residential customers registered 244 complaints (92% of total); commercial registered 21 (8%) for a total of 265. Most complaints – 72% - were regarding high bills. The majority of complaints were resolved in less than ten days. In most of the complaints, MP provided information to the customer that demonstrated that the situation was not reasonably within the control of the Company. 27 complaints were registered to CAO.⁸⁸ According to CAO, it handled 29 complaints from MP’s customers in 2024.

⁸⁵ BOMA Initial Comments, July 11, 2025, pp. 1-2.

⁸⁶ BOMA Initial Comments, July 11, 2025, p. 5.

⁸⁷ Xcel SRSQ Report, Part 1 of 3, April 1, 2025, p. 17.

⁸⁸ MP SRSQ Report, April 1, 2025, pp. 106-110.

Docket No. 24-198 – Minnesota Power-Allete Acquisition

In Docket No. 24-198, the Commission approved acquisition of MP by Allete. In the settlement, MP will be subject to underperformance payments of \$250,000 per metric, reporting of which will begin one year after the close of the acquisition. Therefore, the reporting should begin in Docket 27-29 to be filed on April 1, 2027. Enforcement will begin in Docket 28-29 to be filed on April 1, 2028. If MP exceeds the metric and triggers an underperformance payment, 50% will be applied to each customer's bill during the following July billing cycle on an equal rate per kWh, and 50% will be reinvested into options to address causes of the exceeded metric's underperformance. The metrics include:

- No more than 50 customer complaints, not counting DER service complaints
- Granting 99% of CWR protection requests
- Restore at least 65% of involuntary disconnections within 24 hours
- Answer at least 80% of customer calls received during business hours within 20 seconds
- Ensure at least 99.3% of customer invoices are accurate⁸⁹

C. OTP

OTP fielded 113 complaints in 2024. 93% of complaints were resolved upon initial inquiry. Most of the complaints resulted in an action that the customer and the utility could agree upon. Since 2020, the majority of complaints have been filed by residential customers. In 2024, 11 customers filed complaints with the CAO.⁹⁰ CAO logged nine complaints from OTP's customers in 2024.

ADDITIONAL REPORTING REQUIREMENTS FROM COMMISSION ORDER

I. Percent Uptime and Electronic Communication

Order Points 2. Required Minnesota Power, Otter Tail Power, and Xcel Energy to provide the following new information regarding electronic utility-customer interaction beginning with the reports filed in April 2023:

Percentage Uptime		[To second decimal]
	General Website	XX.XX%
	Payment Services	XX.XX%
	Outage map &/or Outage Info page	XX.XX%
Error Rate Percentage		[To third decimal]

⁸⁹ 25-29 Department Reply Comments, November 3, 2025, Attachment 2.

⁹⁰ OTP SRSQ Report, April 1, 2025, pp. 68-70.

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	Payment Services*	XX.XXX%
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**If more granular data is available, please break down the error rate for unexpected errors, errors outside of the customer's control (i.e. how often to online payments fail for reasons other than insufficient funds or expired payment methods), and/or some other meaningful categorization.*

Order Point 3. Required Minnesota Power, Otter Tail Power, and Xcel Energy to provide percentage uptime and error rate percentage information in their annual reports for the next three reporting cycles, to build baselines for web-based service metrics.

Order Point 4. Required Minnesota Power, Otter Tail Power, and Xcel Energy to continue to provide information on electronic utility-customer interaction such that baseline data are collected:

- *Yearly total number of website visits*
- *Yearly total number of logins via electronic customer communication platforms*
- *Yearly total number of emails or other customer service electronic communications received; and d. Categorization of email subject, and electronic customer service communications by subject, including categories for communications related to assistance programs and disconnections as part of reporting under Minn. R. 7826.1700*

The Commission required the utilities to provide information on electronic customer services in the SRSQ reports filed in April 2023, 2024, and 2025.⁹¹ The Department noted that Order Point 3 of the 2020 SRSQ order only requires the utilities to provide information on web-based service metrics (percent uptime/error rate percentage and electronic utility-customer interaction) through 2024 and recommends that the Commission extend this reporting requirement for the next three-year cycle – 2026-2028 (**Decision Options 7 and 8**).

A. Xcel

Percent Uptime

Xcel's percent uptime for its website, payment services, and outage map are all more than 99%. The average error rate percentage is less than 0.15%.⁹²

Electronic Communication

In 2024, Xcel logged 13.6 million My Account/mobile app visits, 11.9 million visits to its website and social media channels, and approximately 104,000 emails. Since then, Xcel stated that it no longer uses email to communicate with customers due to poor customer satisfaction and is

⁹¹ Docket No. E-015/M-21-230, *In the Matter of Minnesota Power's 2020 Annual Safety, Reliability and Service Quality Report*, [Order \(December 2, 2021\)](#), Order Points 2-4.

⁹² Xcel SRSQ Report, Part 1 of 3, April 1, 2025, p. 19.

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now using its mobile app and MyAccount website.

B. MP

Percent Uptime

MP showed strong uptime percentage performance in 2024 – between 99-100%.⁹³ The error rate percentage for its payment services – Speedpay – was 0.75%.⁹⁴

Electronic Communication

MP had 1.72 million website views, 58,000 social media interactions, 622,000 visits to MyAccount or its mobile app, and fielded nearly 20,000 emails.⁹⁵

C. OTP

Percent Uptime

OTP's percent uptime rate was between 99-100%. Its error rate percentage for its payment services was 0.1%.⁹⁶

Electronic Communication

OTP saw 4.2 million webpage visits in 2024. Website views increased significantly – by 131% - between 2023 and 2024.⁹⁷ There were approximately 60,000 interactions with OTP's social media accounts. There were more than 500,000 log-ins to the payment services website – MyMeter. Finally, OTP fielded nearly 1,500 emails in 2024.⁹⁸

II. Public-Facing Summaries

*Order Point 8. Required Xcel Energy, Minnesota Power, and Otter Tail Power to each display, either directly or via a link to a PDF file, the utility's public facing summary, as shown in Attachment A, on the utility's website placed such that the summary is available to a website user after a single click away from the home page.*⁹⁹

⁹³ 25-29 Department Initial Comments, July 11, 2025, pp. 31-32.

⁹⁴ 25-29 Department Reply Comments, November 3, 2025, p. 3.

⁹⁵ 25-29 Department Initial Comments, July 11, 2025, pp. 31-32.

⁹⁶ 25-29 Department Initial Comments, July 11, 2025, Table 17, p. 35.

⁹⁷ 25-30 Department Initial Comments, July 11, 2025, p. 35.

⁹⁸ OTP SRSQ Report, April 1, 2025, Tables 15 and 16, p. 40.

⁹⁹ Docket No. E-015/M-22-163, *In the Matter of Minnesota Power's 2021 Safety, Reliability and Service Quality Standards Report*, [Order \(November 9, 2022\)](#), Order Point 8.

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A. Xcel

A link to [Xcel’s public-facing summary](#) is located at the very bottom of the home page.¹⁰⁰

B. MP

MP published [its public-facing summary](#) one click from the home page.¹⁰¹

C. OTP

OTP’s public-facing summary is published at [its Customer Resources page](#) and added to the left-hand navigation so that it is one-click from the home page.¹⁰²

III. Future Reporting in Spreadsheet Format

Currently, utilities submit its data in PDF form, which creates a great amount of administrative burden for all parties and results in a lack of clarity on how calculations are made. Therefore, Staff provides **Decision Option 9**, which will require all utilities to provide their SRSQ data in a .xlsx format in the future.

METRICS TO BE MONITORED IN THE 2025 SRSQ REPORTS

Table xx below displays all of the metrics that Staff will be monitoring in the 2025 SRSQ reports. Note that there are no reporting metrics from MP that Staff will be monitoring.

Table 13: Metrics to be Monitored in the 2025 SRSQ Reports

Metrics	Xcel	OTP
Involuntary Disconnections	Xcel’s disconnections have continued to grow, largely due to AMI deployment, despite consumer protection efforts as ordered by the Commission. Staff will continue to closely examine Xcel’s disconnection numbers.	There is a gap between customers seeking and being granted CWR protections. OTP said that this was due to CSRs not being able to access its CWP forms. Staff asks for an explanation of this in the 2025 SRSQ report.
		11% of involuntarily disconnected customers were restored by a payment arrangement. This is still low compared to the other utilities. Staff asks for an explanation of this in the 2025 SRSQ report, as well as sharing how customer service representatives create payment arrangements, including any other standard payment arrangements it offers to customers outside of

¹⁰⁰ 25-27 Department Initial Comments, July 11, 2025, p. 17.

¹⁰¹ 25-29 Department Initial Comments, July 11, 2025, p. 33.

¹⁰² OTP SRSQ Report, April 1, 2025, p. 41.

		the CWR payment plans.
Call Center Response Times		OTP did not report its outage calls. Staff will look for this metric in its 2025 SRSQ Report.

DECISION OPTIONS

1. Accept Otter Tail Power’s, Minnesota Power’s, and Xcel Energy’s 2023 Safety, Reliability, and Service Quality reports. *(Xcel, MP, OTP, Department)*

Volume 1 Decision Options

Staff note: Classically a supplemental filing is required after the IEEE benchmarking data is posted, as that does not happen until after the April 1 filing deadline, however, this year, MP and OTP have proposed an alternative that removes the need for a supplemental filing requirement. Decision Options 2-4 allows for this shift for OTP and MP while maintaining the same IEEE benchmarking comparisons (e.g. second quartile and utility size) for the utilities’ reliability standards and a supplemental filing for Xcel. Decision Option 5 would also negate the need for a Xcel supplemental filing, aligning with OTP and MP.

2. Set Minnesota Power’s 2025 statewide Reliability Standard at a five-year mean of the IEEE benchmarking second quartile for medium utilities (2020-2024 data). Set Minnesota Power’s work center reliability standards at a five-year mean of the IEEE benchmarking second quartile for small utilities (2020-2024 data). *(Minnesota Power, Department)*
3. Set Otter Tail Power’s 2025 statewide Reliability Standard at a five-year mean of the IEEE benchmarking second quartile for medium utilities (2020-2024 data). Set Otter Tail’s work center reliability standards at a five-year mean of the IEEE benchmarking second quartile for medium utilities (2020-2024 data). *(Otter Tail Power, Department)*
4. Set Xcel Energy’s 2025 statewide Reliability Standard at the IEEE benchmarking second Quartile for large utilities. Set Xcel Energy’s Southeast and Northwest work center reliability standards at the IEEE benchmarking second quartile for medium utilities. Set Xcel’s Metro East and Metro West work center reliability center standards at the IEEE benchmarking second quartile for large utilities. Require Xcel Energy to file a supplement to its 2025 SRSQ report 30 days after IEEE publishes the 2025 benchmarking results, with an explanation for any standards the utility did not meet. *(Xcel, Department)*

[OR]

5. Set Xcel Energy’s 2025 statewide Reliability Standard at a five-year mean of the IEEE benchmarking second Quartile for large utilities (2020-2024 data). Set Xcel Energy’s

Southeast and Northwest work center reliability standards at a five-year mean of the IEEE benchmarking second quartile for medium utilities (2020-2024 data). Set Xcel’s Metro East and Metro West work center reliability center standards at a five-year mean of the IEEE benchmarking second quartile for large utilities (2020-2024 data). *(Staff proposed alternative to above DO)*

Volume 2 Decision Options

- 6. Require Xcel Energy to file Call Center Response Time data in the format used in the July 11, 2025 Department of Commerce comments at page 40 in future safety, reliability, and service quality reports – broken out between agents (with subcategories), IVR (with subcategories), and totals. *(Staff recommendation)*
- 7. Require Xcel Energy, Minnesota Power, and Otter Tail Power to provide the following information regarding electronic utility-customer interaction for the next three reporting cycles to build baselines for web-based service metrics, beginning in the 2025 safety, reliability, and service quality reports to be filed on April 1, 2026: *(Department)*

Percentage Uptime		[To second decimal]
	General Website	XX.XX%
	Payment Services	XX.XX%
	Outage map &/or Outage Info page	XX.XX%
Error Rate Percentage		[To third decimal]
	Payment Services*	XX.XXX%

*If more granular data on Payment Services is available, the report shall break down the error rate for unexpected errors, errors outside of the customer’s control (i.e. how often online payments fail for reasons other than insufficient funds or expired payment methods), and/or some other meaningful categorization.

[AND]

- 8. Require Xcel Energy, Minnesota Power, and Otter Tail Power to provide information on electronic utility-customer interaction for the next three reporting cycles, such that baseline data is collected on: *(Department)*
 - a. Yearly total number of website visits.
 - b. Yearly total number of logins via electronic customer communication platforms.
 - c. Yearly total number of emails or other customer service electronic communications received.
 - d. Categorization of email subject, and electronic customer service communications by subject, including categories for communications related to assistance

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programs and disconnections as part of reporting under Minn. Rule 7826.1700.

9. Require Xcel Energy, Minnesota Power, and Otter Tail Power to provide SRSQ data in .xlsx format. *(Staff recommendation)*

Volume 3 Decision Options

Variance to Minn. Rule 7820.2500

10. Approve Xcel Energy's request for temporary extension of the variance to Minn. Rule 7820.2500 regarding AMI remote disconnection. *(Xcel, Department)*

[AND]

11. Extend Xcel Energy's variance until the Commission issues a decision on the variance request as presented in the 2025 Safety, Reliability, and Service Quality report to be filed on April 1, 2026 in Docket E-002/M-26-27. *(Xcel, Department)*

[If Decision Option 10 is not chosen, the Commission must choose Decision Option 12.]

12. Require Xcel Energy to revise its Manual Meter Reading Service Rider and Service Reconnection Tariff in its Electric Rate Book to the language in Xcel's Errata Letter to the August 30, 2022 Reply Comments in Docket E-002/M-22-233. *(Staff recommendation)*

Reporting Requirements from the Commission's Order in 24-27

13. Accept Xcel Energy's reporting as required by the Commission's January 13, 2025 Order in Docket No. E-002/M-24-27. *(Xcel, Department)*

Various Consumer Protections

14. Require Xcel Energy to evaluate whether the Company could allow a customer to complete its Medically Necessary Equipment & Emergency Certification form and indicate that Xcel Energy may reach out to the customer's medical provider to confirm their need for medically necessary service in its next annual SRSQ report, to be filed on April 1, 2026. *(Department)*
15. Require Xcel Energy to include stakeholder groups in any outreach related to its third-party evaluator's work. *(ELPC/CEF/VS)*
16. Require Xcel Energy to add layers to its ISQ map:
 - a. Energy burden. *(Staff)*
 - b. Distribution capital spending per customer.

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- c. Households in a managed EV charging program.
- d. Age of distribution infrastructure.
- e. Outage response time and spending per customer/CBG.