



414 Nicollet Mall
Minneapolis, MN 55401

August 10, 2015

—Via Electronic Filing—

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: REPLY COMMENTS
NATURAL GAS SERVICE QUALITY REPORT
DOCKET NO. G002/M-15-406

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits this Reply to the July 31, 2015 Comments of the Minnesota Department of Commerce – Division of Energy Resources in the above-referenced docket.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list.

Please contact Rebecca Eilers at 612-330-5570 or rebecca.d.eilers@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

BRIA SHEA
REGULATORY MANAGER

Enclosures
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
John Tuma	Commissioner
Betsy Wergin	Commissioner

IN THE MATTER OF NORTHERN STATES
POWER COMPANY, ANNUAL REPORT ON
NATURAL GAS SERVICE QUALITY FOR
2014

DOCKET NO. G002/M-15-406

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Reply to the July 31, 2015 Comments of the Minnesota Department of Commerce – Division of Energy Resources on our Annual Report on Natural Gas Service Quality for 2014.

We appreciate the Department’s review and the recommendation that the Commission accept our Report. We provide our Reply to the Department’s request for additional information below.

REPLY

A. Call Center Data

The Department requested that we explain and reconcile the difference between the Company’s and the Department’s calculation of the percent of calls being answered within 20 seconds and correct as needed the calculation of the call center response time for the years 2010 through 2014.

Footnote 26 of Attachment A to our Annual Report indicates that the percentage in Line 26 (Service Level All Calls (including calls handled by IVR)) is calculated by dividing Line 23 (All Calls Answered by Agents within 20 seconds + Outage Calls Handled by IVR + Billing Calls Handled by IVR) by Line 22 (All Calls Offered to Agents + Outage Calls Handled by IVR + Billing Calls Handled by IVR). In order to

include all agent calls *and* all IVR handled calls, we calculate Line 26 by also adding Line 21 to both the numerator and the denominator. Adding in Line 21 (Non Billing and Outage Calls Completed in the IVR) ensures that the calculation includes those customers that were provided information through the IVR and hung up after receiving the information. Line 26 is the percentage of Service Level All Calls (*including calls handled by IVR*), which is why Line 21 is included. The call volume in Line 21 is not included in any of the other calculations. To illustrate:

$$\frac{\text{Line 23 (3,361,652)} + \text{Line 21(1,452,308)}}{\text{Line 22 (1,741,298)} + \text{Line 21(1,452,308)}} = \text{Line 26 (90.0\%)}$$

We have consistently used the “Non Billing and Outage Calls Completed in the IVR” to calculate this percentage and therefore no update to the data is needed for past years’ reports. We acknowledge that the footnote could more clearly indicate the inclusion of the additional IVR calls in Line 21 and will update the Line 26 footnote in Attachment A in future reports.¹

B. Meter Reading

The Department requested we discuss the reasons for the increase in the number of meters not read for periods of six to 12 months in 2014.

The majority of the increase in estimated reads was in the metro area. Two meter readers left the Company at the end of 2013, though these positions were not scheduled to be eliminated until later in 2014. Due to scheduled installation of automated meters later in 2014, we did not replace the two employees because we expected that automation would offset the reduced staffing. We completed automation of load profile meters in early 2015, which was later than originally anticipated, thus the number of estimates for 2014 was greater than in 2013. We are currently rerouting the readers to cover metro area meters that are not yet automated to improve efficiency. We expect that this rerouting will improve performance in 2015. Below is a current snapshot of our performance year-to-date as it compares to previous years.

¹ We will also include this footnote update in Attachment I of the Electric Rules Quality of Service Reports, filed annually on April 1, which includes the same data.

Meters not Read for Periods of 6 to 12 Months

Month	2013	2014	2015
January	529	486	485
February	543	509	380
March	393	669	399
April	413	678	373
May	292	654	262
June	236	1,059	407
Total at mid-year	2,408	4,055	2,306

Now that the anticipated automated meters have been installed, our meters not read for 6 to 12 months has returned to a level closer to 2013.

C. Service Interruptions

The Department requested we discuss the reasons for the increase in duration of service interruptions in 2014.

One service interruption in Stillwater on May 28 lasted more than four hours, impacting service for 18 customers. This outage occurred at about 4:40 PM, which is just past the end of the regular work day for our crews, so the on-call crew had to be called in to address the service outage. It took more time to get the crew in, to their vehicles, and deployed to the location of the outage than if the outage had occurred during the regular work day. This one service interruption is the primary reason for an increase in average outage time for service interruptions caused by Xcel Energy employees or contractors.

CONCLUSION

We appreciate the Department's review of our Report and are hopeful the additional information we provided in these Reply Comments meets the Department's requests for further information. We respectfully request that the Commission approve our Annual Report on Natural Gas Service Quality for 2014 as supplemented by these Reply Comments.

Dated: August 10, 2015

Northern States Power Company

CERTIFICATE OF SERVICE

I, Lynnette Sweet, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

DOCKET No. G002/M-15-406

Dated this 10th day of August 2015

/s/

Lynnette Sweet

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