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Minneapolis, MN 55401

May 15, 2025

—Via Electronic Filing—

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: 2024 ANNUAL REPORT
QUALITY OF SERVICE PLAN (QSP) TARIFF
DOCKET NOS. E,G002/CI-02-2034 AND E,G002/M-12-383

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Annual Report on our service quality results for the 2024 performance year. We submit this report pursuant to our Quality of Service Plan (QSP) Tariff, which was amended by the Commission's August 12, 2013 Order (2013 Order) in the above-noted dockets.

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 Jemar Lee at jemar.w.lee@xcelenergy.com or 319-450-3189, or me at nicholas.f.martin@xcelenergy.com or (612) 330-6255 if you have any questions regarding this filing.

Sincerely,

/s/

NICHOLAS MARTIN
DIRECTOR, STRATEGY OUTREACH & ADVOCACY

Enclosures
cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Audrey C. Partridge	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF NORTHERN STATES
POWER COMPANY'S 2024 ANNUAL
REPORT ON QUALITY OF SERVICE PLAN
(QSP) TARIFF

DOCKET NOS. E,G002/CI-02-2034 AND
E,G002/M-12-383

**Annual Report and Tariff
Modification Request**

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Annual Report and Tariff Modification Request pursuant to our Quality of Service Plan (QSP) Tariff, which was amended by the Commission's August 12, 2013 Order (2013 Order) in the above-noted dockets.

This report begins by providing 2024 performance results under our QSP Tariff. The Company met the QSP Tariff standards for five metrics and exceeded them for two: (1) Customer Complaints and (2) Telephone Response Time. We expect to incur \$2 million in underperformance payments. We propose in this Report a disbursement plan for those underperformance payments. Pursuant to discussions in the September 19, 2024 agenda meeting in this docket, we propose to use the applicable customer refunds on initiatives to address the specific metrics exceeded and to provide a meaningful refund to impacted customers.

For the Customer Complaints metric, rather than returning 50 percent of the underperformance payment to all Minnesota customers as a very small refund, we propose using this portion for bill credits to customers who have large past-due balances, have received a disconnection notice, have not otherwise received energy assistance, and are working to pay off their bill. We believe helping these customers pay down their past-due balance – combined with other measures the Company began implementing in 2025 to reduce disconnections and facilitate payment plans – will directly address a leading cause of complaints.

For the Telephone Response Time metric, again in lieu of a small customer refund, we propose using 50 percent of the underperformance payment to accelerate deployment of a Live Chat function, modeled on a small pilot that has shown high customer satisfaction results. Full deployment of Live Chat should allow more customer inquiries to be resolved quickly and without telephone calls – as many of our customers increasingly prefer – and should help restore performance on our Telephone Response Time metric.

Finally, we summarize our discussions with the QSP Settlement Agreement parties on two issues raised in Order Point 3 of the Commission’s October 9, 2024 Order in this docket. We also propose certain modifications to the QSP Tariff, beginning in 2026. First, we propose an update to the basis years for the Customer Complaints standard, which is currently based on 2005-2011 data. That data does not reflect the much greater number and complexity of products, rates, metering, technologies and risks that exist today relative to twenty years ago, and that lead to many of the complaints the Company receives. We propose to retain the same method and number of years, but update to more recent basis years. Second, we propose a clarification to the QSP Tariff definition of Customer Complaint to ensure that complaints have been communicated to the Company and we have an opportunity to resolve them before they are added to the annual tally.

The remainder of this report is organized as follows:

- Section I summarizes QSP Tariff Plan Performance in 2024;
- Section II provides details on the Customer Complaints metric;
- Section III provides details on the Telephone Response Time metric;
- Section IV summarizes customer outage credits for 2024;
- Section V proposes a plan for disbursement of the 2024 underperformance payments; and
- Section VI summarizes our discussions with the QSP Settlement Agreement parties and proposes prospective QSP Tariff modifications.

ANNUAL REPORT

I. TARIFF PLAN PERFORMANCE

Most QSP performance standards were met in 2024. Results are summarized below.

TABLE 1
PERFORMANCE ON QSP METRICS IN 2024

Metric	2024 Performance	Standard	Met?
Customer Complaints to PUC	1,468 complaints	≤ 383 complaints*	No
Telephone Response Time (percent of calls answered in ≤ 20 sec)	79.7%	≥ 80%	No
Electric Reliability – SAIDI	108.23 min	≤ 133.23 min	Yes
Electric Reliability – SAIFI	1.06 outage events	≤ 1.21 outage events	Yes
Gas Emergency Average Response Time	28.13 min	≤ 60 min	Yes
Accurate Invoices	99.64%	≥ 99.3%	Yes
Invoice Adjustment Timeliness	1.48 billing periods	≤ 2.35 billing periods	Yes

*Customer complaint standard is ≤ .2059 complaints per 1,000 customers. This number reflects the calculation for 2024.

The following attachments provide additional detail:

- Attachment A: QSP Tariff Summary
- Attachment B: Customer Complaints by Category
- Attachment C: Telephone Response Time Detail
- Attachment D: Reliability Detail
- Attachment E: Major Event Days (MEDs)
- Attachment F: Gas Emergency Response Time Detail
- Attachment G: Accurate Invoice Detail
- Attachment H: Invoice Adjustment Timeliness Detail
- Attachment I: Proposed QSP Tariff Modifications (redline and clean)

II. CUSTOMER COMPLAINTS

A total of 1,468 customer complaints were received in 2024. Attachment B shows the breakdown of these complaints by month, and by the seven complaint categories required in the QSP Tariff.¹

Similar to 2023, the majority of customer complaints were in the Billing & Credit category (1,083 of 1,468, or 74 percent). Of the Billing & Credit complaints, 88 percent were in the Credit category, focused on disconnections and reconnection payment plans. The increase in this category can be attributed to post-pandemic economic conditions such as inflation impacting food, housing and transportation costs, leading to a greater number of customers falling behind on their utility bills and ultimately facing

¹ Minnesota Electric Rate Book, General Rules and Regulations (Section 6), Service Quality (Sheet No. 7.2).

disconnection. In addition, with the implementation of Advanced Metering Infrastructure (AMI), the Company has the capability to remotely disconnect customers, which has led to a greater number of customers eligible for disconnection – though still a small minority of those customers – actually being disconnected.

Previously, the requirement under Minn. Rule 7820.2500 for a personal visit by a representative of the utility prior to final disconnection, combined with staffing limitations, resulted in a very small proportion of the customers eligible for disconnection actually being disconnected. With the current variance to this rule, which allows voicemail and other modes of electronic communication in lieu of a field visit, a larger proportion – though still less than 20 percent of those eligible for disconnection – are being disconnected. We believe this may contribute to the increase in customer complaints.

When customers reach out to the Company to complain of a disconnection, it also provides the Company with an additional opportunity to engage with customers we have not otherwise been able to reach, offering them payment arrangements and referring them to energy assistance available from the state and from Xcel Energy.

Working with our customers, the Company continues to resolve the vast majority of complaints we receive. Attachment B only shows the number of complaints received, but additional detail on the number resolved and unresolved is provided in Attachment G to the Company’s 2024 Annual Report on Electric Safety, Reliability and Service Quality (Docket No. E002/M-25-27). Table 2 reproduces the relevant totals from that Attachment. About 85 percent of all complaints (1,249 of the 1,468 across the three customer classes shown in Table 2) were resolved by the Company by the end of 2024, and the number unresolved (219) is well below the 2024 QSP standard of 383 complaints. The Company continues to work on any unresolved complaints until they are completed. Resolving a complaint does not, however, remove it from the QSP Customer Complaints total; complaints can only be added to the tally, never removed.

TABLE 2
COMPLAINTS RECEIVED, RESOLVED, AND UNRESOLVED IN 2024

	RESIDENTIAL			COMMERCIAL			INDUSTRIAL		
	Received	Resolved	Unresolved	Received	Resolved	Unresolved	Received	Resolved	Unresolved
Total complaints	1,436	1,227	209	31	21	10	1	1	-
Percent of total, by customer class		85%	15%		68%	32%		100%	0%

We believe recent changes to our Minnesota disconnection policy – agreed to with parties to the 2024 Electric Safety, Reliability and Service Quality docket, and

memorialized in the Commission’s January 13, 2025 Order in that docket² – should improve customers’ ability to enroll in a payment plan and avoid disconnection, which may also reduce customer complaints going forward. Those changes include significantly reduced payment plan down payments, increased past-due balance thresholds prior to notice of disconnection (\$180) and prior to disconnection (\$300), additional time between disconnection warning and actual service disconnection, additional communication channels, and additional outreach to customers in need of energy assistance. The changes are summarized in our *Minnesota Disconnection Process* document, filed in the above docket and available online.³ Those changes went into effect in early 2025 and are not reflected in the 2024 complaint totals.

III. TELEPHONE RESPONSE TIME

Attachment C to this Annual Report provides a summary of our 2024 Telephone Response Time metric and depicts an average of 79.7 percent of calls answered in 20 seconds or less, which is just below the standard of 80 percent. The Telephone Response Time metric includes all calls to our Call Centers or business office, whether they are handled via Interactive Voice Response (IVR) or by call center representatives.

Staffing challenges and severe weather events were the main drivers of the lower Telephone Response Time performance in 2024. Staffing issues were largely caused by a challenging hiring market and recruiting efforts falling short, resulting in new hire classes that were not as full as we were targeting. As short staffing occurred, the remaining agents became busier, resulting in longer calls and higher attrition levels. This compounded the staffing shortages throughout the year. In addition to the staffing challenges, severe weather events in July and August contributed to higher call volumes and lower performance during those months, as shown in Attachment C.

Late in 2024 we began to increase our staffing levels to improve our ability to meet the QSP Telephone Response Time metric in 2025. We believe added staff, combined with our proposal to use a portion of the 2024 Telephone Response Time underperformance payment to accelerate deployment of a Live Chat function, should allow the Company to restore performance on this metric.

IV. CUSTOMER OUTAGE CREDITS

The QSP Tariff requires that we pay a \$50 credit to customers experiencing six or more outages unrelated to major event days (MEDs) in the performance year, and those experiencing an outage lasting 24 hours or more.

² January 13, 2025 ORDER ACCEPTING REPORTS AND SETTING ADDITIONAL REQUIREMENTS. *In the Matter of Xcel Energy’s 2023 Annual Safety, Reliability and Service Quality Report*. Docket No. E-002/M-24-27.

³ See [Payment Arrangements](#) | [Billing & Payment](#) | [Xcel Energy](#).

In addition, the QSP Tariff also provides a credit for customers who have continuously resided at an address experiencing consecutive years of interruptions according to the below terms:

- A \$75 credit to customers experiencing five or more interruptions in two consecutive years;
- A \$100 credit to customers experiencing four or more interruptions in three consecutive years; and
- A \$125 credit to customers experiencing four or more interruptions in four or more consecutive years.

The QSP Tariff further provides that large municipal pumping customers on the A41 Tariff receive \$200 credits for each outage unrelated to MEDs lasting more than one minute per year. Similarly, small municipal pumping customers on the A40 Tariff receive \$100 credits for each outage unrelated to MEDs lasting more than one minute per year. Table 3 provides the detailed customer count per outage credit type.

TABLE 3
2024 OUTAGE CREDITS

	2024 Credits	Dollars
Six or More Service Outages	9,447	\$472,350
Outages Lasting 24 Hours or Longer	1,429	\$71,450
Consecutive Years of Outages	929	\$82,200
Tracked Small Municipal Pumping Outages (A40)	1,123	\$112,300
Untracked Small Municipal Pumping Outages (A40)	248	\$41,168
Tracked Large Municipal Pumping Outages (A41)	560	\$112,000
Untracked Large Municipal Pumping Outages (A41)	195	\$52,065
Total	13,931	\$943,533

As discussed in prior annual reports, the Company is unable to track all outages for all our customers due to the constraints of our current distribution infrastructure. As a result, there are approximately 200 large municipal pumping meters (on the A41 Tariff) which may have had untracked outages that were greater than one minute and equal to or less than five minutes. There are also approximately 250 small municipal pumping meters (on the A40 Tariff) which may have had untracked outages that were greater than one minute and equal to or less than five minutes. We have issued proxy credits for these customers who may have had untracked momentary outages.

To determine the large municipal pumping customer proxy credit, we used the 2024 outages that were greater than one minute and equal to or less than five minutes that we can track for our other municipal pumping customers and determined that on average, other large municipal pumping customers received \$267 (equal to 1.34 outages per year

at \$200 per outage) in credit for outages of this duration. We recently sent the customers with untracked outages a letter and issued a \$267 bill credit. The letter provides customers an opportunity to provide documentation for additional credits if they believe they had additional qualifying outages in 2024.

To determine the small municipal pumping customer proxy credit, we used the 2024 outages that were greater than one minute and equal to or less than five minutes that we can track for our other small municipal pumping customers and determined that on average, other small municipal pumping customers received \$166 (equal to 1.66 outages per year at \$100 per outage) in credit for outages of this duration. We recently sent the customers with untracked outages a letter and issued a \$166 bill credit. The letter provides customers an opportunity to provide documentation for additional credits if they believe they had additional qualifying outages in 2024.

V. PROPOSED DISBURSEMENT OF 2024 UNDERPERFORMANCE PAYMENTS

The Company exceeded its Customer Complaint and Telephone Response Time metrics in 2024, resulting in a combined \$2 million underperformance payment.⁴ Below we provide our proposal for disbursement of those payments.

A. Tariff Language

Section 6, Sheet 7.6 of our Minnesota Electric and Gas Rate Books provides the requirements for disbursement of underperformance payments.

50% of any underperformance payments assessed will be applied to customer bills during the following July billing cycle of a given performance year. Any bill credit amounts not remitted by the end of the July billing cycle shall accrue interest beginning after the September billing cycle of the applicable year at a rate equal to that applied to the Company's customer deposits.

50% of any underperformance payments assessed will be added to the amount budgeted for the maintenance and repair of the Company's natural gas and electric distribution system. The Company shall maintain records sufficient to enable tracking, by Work Center, the amounts budgeted, amounts added due to underperformance payments incurred, and amounts expended in a given year.

⁴ Northern States Power Minnesota Electric and Gas Rate Books, Section 6, Sheet 7.5.

B. Proposal for 2024 Underperformance Payments

In its September 19, 2024 agenda meeting on our QSP Annual Report for 2023, the Commission questioned whether it is meaningful to disburse 50 percent of any underperformance payment as a refund to all Minnesota customers. They noted that \$500,000 translates into a small bill credit, applied during one month of the following year, which may go unnoticed by most customers. We agree; in 2024, that refund was just \$0.38. We propose instead to use this portion of the underperformance payments more strategically, tying the disbursement plan to the metrics exceeded and the primary driver of the exceedances. We address each metric in turn.

1. Customer Complaints

As noted above, a large majority of the 2024 Customer Complaints were in the Billing & Credit category, and many of those were related to disconnection, disconnection warnings, and payment plans. As in 2023, we propose to use 50 percent of the Customer Complaints underperformance payment to help customers reduce their past-due balance, which helps them enter into and maintain a payment arrangement and increases their chances of avoiding disconnection.

For customer identification, we propose to use similar criteria as used for the 2023 underperformance payment, focusing on assisting customers who have made recent payments but have fallen behind on their bill, are not receiving other assistance, and have received a notice of potential disconnection. Specifically, we propose to award bill credits to customers who:

1. Have a past-due balance greater than \$2,000;
2. Have not otherwise received energy assistance;
3. Are working to pay off their bill, as demonstrated by a payment on their account in the last 90 days;
4. Have received a notice of potential disconnection.

For the 2023 underperformance payment we also applied a geographic criterion to award bill credits to customers who “live within specified low-income census block groups starting with the census blocks with the lowest income.”⁵ This approach, while complex to implement, had the advantage of directing bill credits to some of the same CBGs where disparities in disconnections had been identified. However, as we noted in our February 7, 2025 monthly report in this docket, the combination of applying several

⁵ October 9, 2024 ORDER ON DISTRIBUTION OF UNDERPERFORMANCE PENALTY. Docket Nos. E,G-002/CI-02-2034 and E,G-002/M-12-383. Order Point 1.

customer-specific criteria and ranking CBGs by household income resulted in the 1,000 customers who received bill credits being spread across 498 CBGs. The highest number receiving bill credits in a single CBG was 11 customers, and in most CBGs only 1 or 2 customers received bill credits. In other words, the bill credits were not concentrated in a few, very low-income CBGs. We concluded that:

A potential lesson for future bill credits is that, if the Commission prefers a greater geographic concentration of assistance in the very lowest-income CBGs, fewer customer-specific criteria would be preferred. If the Commission prefers less geographic concentration, but more consideration given to customer-specific circumstances, the additional criteria are appropriate.⁶

Based on what we learned from this, for the 2024 underperformance payment our recommendation is to use the four customer-specific criteria listed above, but grant bill credits regardless of geographic location of residence. If the Commission prefers to continue applying a geographic criterion based on CBG-level median income, we would propose to use a similar method as for the 2023 payment. In that case, if the Commission seeks greater concentration of the benefits of bill credits in the very lowest-income CBGs, we recommend relaxing the customer-specific criteria. This could be done by using a lower past-due balance in criterion #1, relaxing the criterion #2 requirement of not having received other energy assistance, relaxing the criterion #3 requirement of a payment in the last 90 days, or other changes. This should lead to a greater number of customers in the very lowest-income CBGs receiving bill credits. The tradeoff of more customers in the lowest-income CBGs qualifying for a bill credit is that the \$500,000 will be exhausted before reaching somewhat higher-income CBGs. This means some customers who have a high past-due balance and could benefit from a bill credit, but happen to live in a CBG with higher median income, would not receive credits.

For the 2023 underperformance payment, the Commission elected a \$500 bill credit to 1,000 customers. We recommend the same here.

2. Telephone Response Time

The QSP Telephone Response Time metric was narrowly missed in 2024, with the Company answering 79.7 percent of calls in 20 seconds or less. Prior to 2024, the Company missed the standard for this metric only once – in 2005 – and in many years has significantly exceeded 80 percent of calls answered in 20 seconds. High call volume, severe weather events, and staffing challenges were the primary causes for our missing it in 2024. Hence, there is a strong rationale for using the underperformance payment for

⁶ Northern States Power Company, doing business as Xcel Energy. MONTHLY REPORT #4 - ORDER ON DISTRIBUTION OF UNDERPERFORMANCE PENALTY. Docket Nos. E,G002/CI-02-2034 and E,G002/M-12-383. February 7, 2025.

an initiative that would help us reduce wait times and return to our pre-2024 performance on this metric.

We propose investing 50 percent of the Telephone Response Time underperformance payment to accelerate deployment of a Live Chat function for customer assistance. This would enhance the customer experience and reduce the volume of calls that need to be handled by a live agent.

The Company is currently piloting this function with a small number of live chat agents. Our experience with the pilot shows high customer satisfaction and first call/contact resolution. This initiative launched in April, so the program is still in its infancy and data is limited. However, early results are encouraging. In the first few days after this program was launched, the Company trained 16 Customer Service Representatives (CSRs) on the live chat option, and these CSRs handled over 400 requests, with customer experience/satisfaction scores coming in at over 90 percent satisfaction.

We see this as an opportunity to provide customers with an additional communication channel that offers answers to billing questions, payment arrangements, and other needs, without having to place a telephone call. In this way, Live Agent chat offers the potential for reduced telephone response time and improved customer satisfaction. The Company currently has 16 agents fully trained to support this channel, with eight agents supporting the channel full-time. Initial results indicate that it does take longer to complete requests through this channel due the typing required by both customers and agents; however, agents are currently able to complete two chats simultaneously. By accelerating the expansion of the live chat pilot function with a larger number of CSRs using live chat, using this information as the foundation of our estimates, we estimate full implementation would cost approximately \$950,000, with this estimate primarily representing the labor cost to deploy more agents (31 agents receiving full training and 16 agents being deployed full time to the project). We would propose using 50 percent of the Telephone Response Time underperformance payment toward the cost of deployment.

VI. PROPOSED PROSPECTIVE TARIFF CHANGES

Order Point 3 of the Commission's October 9, 2024 Order in this docket directs parties to discuss two things: "(1) redistribution of the underperformance payments that are applied to customer bills and (2) an inflation adjustment to the underperformance penalty."⁷

⁷ October 9, 2024 ORDER ON DISTRIBUTION OF UNDERPERFORMANCE PENALTY. Docket No. E,G-002/CI-02-2034 and E,G-002/M-12-383. Order Point 3.

We interpret Order Point 3 to direct the Company to have discussions with the other two parties to the QSP Settlement Agreement: the Department of Commerce (Department) and Office of the Attorney General’s Residential Utilities Division (OAG-RUD) (hereafter referred to as the “State Parties”).

The Company fulfilled Order Point 3 by holding three meetings with the State Parties, first individually and then together, to discuss the issues identified in the Order. While those discussions were productive in building mutual understanding, we did not reach agreement on any official changes. We expect those discussions to continue in the docket. The Company takes this opportunity to lay out our position on proposed modifications to the QSP Tariff.

A. QSP Tariff

The QSP Tariff in its current form dates to the Commission’s August 12, 2013 Order in Docket No. E,G-002/M-12-383. The QSP Tariff includes seven metrics, as shown in Table 4.

TABLE 4
QSP TARIFF DETAILS

Metric	Standard	Underperformance Payment
Customer Complaints to PUC	≤ 0.2059 complaints per 1,000 customers	\$1 million
Telephone Response Time (percent of calls answered in ≤ 20 sec)	$\geq 80\%$	\$1 million
Electric Reliability – SAIDI	≤ 133.23 min	\$1 million
Electric Reliability – SAIFI	≤ 1.21 outage events	\$1 million
Gas Emergency Average Response Time	≤ 60 min	\$1 million
Accurate Invoices	$\geq 99.3\%$	\$1 million
Invoice Adjustment Timeliness	≤ 2.35 billing periods	\$1 million

Details of the QSP Tariff are specified in the Minnesota Electric and Gas Rate Books, General Rules and Regulations (Section 6), Service Quality (Sheet Nos. 7.1 through 7.11).

B. Compliance with Order Point 3 of the October 9, 2024 Order

With regard to the direction in Order Point 3 to discuss redistribution of the underperformance payments that are applied to customer bills, the Company discussed with the State Parties our position that tying the disbursement plan to the QSP metric

exceeded and the cause of the exceedance is preferable to simply returning that portion to all Minnesota customers as a very small refund. The State Parties generally agreed with this position. We have not discussed our specific proposals for disbursement of the 2024 underperformance payments, as our discussions did not go to that level of detail, but we note that our proposal is consistent with how these were addressed last year.

With regard to an inflation adjustment to the underperformance payments, the Company also discussed with the State Parties that we do not think an inflation adjustment is justified. The possibility of an inflation adjustment was raised by Commission staff in the Briefing Papers for the Commission's September 19, 2024 agenda meeting, where staff estimated that inflation-adjusted payments would equal about \$1.35 million per metric today.⁸

In aggregate, the QSP Tariff underperformance payments at their current level total potential penalties of \$7 million. These payments are not designed to cover specific expenses that have increased due to inflation; rather, they are performance penalties, set at a level deemed sufficient to motivate improved performance. The potential to incur up to \$7 million in penalties still meets that objective. Moreover, Xcel Energy is the only utility in Minnesota that is subject to a QSP Tariff with financial penalties; further increasing the Company's potential penalties – as proposed by staff, to \$9.45 million – seems to us inequitable.

C. Updating the Standard for Customer Complaints

The Company exceeded the Customer Complaints standard in 2019, 2023 and 2024. We believe the standard, which has not been updated since 2013 and is based on data as much as twenty years old (2005-2011), does not reflect the complexity of the Company's current business or the drivers of today's customer complaints. It has become essentially unachievable and as such, is no longer providing an effective incentive for the Company to improve its performance in this area. While we do not propose to change the basic formula for calculating the standard, we propose here to update the basis years used in that formula.

The current standard of 0.2059 complaints per 1,000 customers is based on data from the seven-year period 2005-2011. The standard translates to 383 complaints for 2024 – that is, about 0.02 percent of the Company's total electric and natural gas customers, or one complaint for every 4,872 customers. Minnesota's standard is less than a third of the corresponding complaints standard in the Company's Colorado jurisdiction, which is set at 0.65 complaints per 1,000 customers, or about 1,700 complaints per year.

⁸ STAFF BRIEFING PAPERS for the September 19, 2024 Agenda Meeting. Docket Nos. E,G-002/CI-02-2034 and E,G-002/M-12-383. Page 19.

In our discussions, the State Parties pointed out that the Customer Complaints standard, since it is set at a number per 1,000 customers, automatically reflects any increase in the Company’s overall customer count. This is true. However, this has added just 37 complaints to the standard since 2013, while the Company added 184,650 customers during those same years.

Table 5 demonstrates what the Customer Complaints standard would be if the same method were used – 1.5 standard deviations from the average number of complaints in prior years – but updating the basis years to the most recent seven, five or three years.

TABLE 5
UPDATED BASIS YEARS FOR CUSTOMER COMPLAINTS STANDARD

Time period	Average # of complaints	+1.5 standard deviations	Resulting threshold # of complaints	Corresponding complaints per 1,000 customers
7 years, 2018-2024	528	679	1,207	0.649
5 years, 2020-2024	610	786	1,397	0.750
3 years, 2022-2024	852	863	1,715	0.919

In discussions with the State Parties, we proposed retaining the same method (1.5 standard deviations) and number of years (seven) but updating the calculation to reflect the most recent seven years. For 2024, this would have resulted in a new standard of ≤ 0.649 complaints per 1,000 customers – coincidentally, almost identical to the Company’s corresponding complaints standard in Colorado. Based on our 2024 customer count, this would have equated to 1,207 complaints for 2024. The Company would still have exceeded this updated standard and incurred an underperformance payment in 2024, but going forward, we believe the updated standard could be achieved with sustained effort.

We believe any performance metric should set a high bar that pushes the Company to improve performance. However, in order to function as intended, a performance metric must be achievable. A metric set at an unattainable level does not incent performance; it is a de facto penalty. Joint Comments in the Transmission Cost Recovery docket from the Department of Commerce, OAG-RUD and the Citizens Utility Board of Minnesota make a similar argument:

PIMs [Performance Incentive Mechanisms] are not a “set it and forget it” construct: PIM targets, penalties, and incentives may need to be adjusted over time to reflect issues with the

Company's performance or due to changes in technologies or policy goals. It is important that changes to PIMs occur at a frequency that balances the need to provide Xcel with regulatory certainty while ensuring PIMs continue to incentivize behavior that is in the ratepayer interest.⁹

The Customer Complaints standard has been treated as a “set it and forget it” construct for over a decade. We believe an update to the standard is justified at this time for four reasons.

First, the Company today offers many more products and services, and the overall complexity of the electric system and technologies has grown dramatically, since the 2005-2011 period on which the standard is based. Merely updating for increased customer count does not reflect this increased complexity of offerings and technologies that can lead to complaints. When the current standard was established, there were no AMI meters in place, much less customer-sited solar, very few customers with electric vehicles, and much less diversity and complexity of the customer options that today lead to many of the complaints the Company receives.

Second, ongoing economic challenges following the COVID pandemic have increased disconnections, which often result in complaints. During the COVID peacetime emergency (March 2020 to August 2021), the Company suspended disconnections and dramatically reduced the down payments required to set up a payment plan. These measures were helpful to customers during an extraordinarily difficult time, but they also led to many customers building up past-due balances they have struggled to pay off after the disconnection moratorium ended. Average past-due balances increased 44 percent during the moratorium, and continued to increase thereafter, to a peak of \$637 in March 2023, up 89 percent relative to before the pandemic. Total arrears (the aggregate past-due balances of all customers past due) increased from \$49 million pre-pandemic (March 2020) to a peak of \$117 million in March 2023, and are today still above \$100 million. This has led to more disconnections, as a large number of customers are struggling economically and prioritizing other household expenses over paying their utility bill. Simultaneously, the variance to Minn. Rule 7820.2500 allowing remote disconnection without a field visit has increased the proportion of customers eligible for disconnection who are actually being disconnected – though the Company is today still only disconnecting less than 20 percent of those eligible for disconnection. Many of those disconnections, while compliant with applicable rules, lead to customer complaints. The Company will continue to work with each individual customer to negotiate an affordable payment plan and connect them with available energy assistance, and beginning in early

⁹ Joint Comments of the Minnesota Department of Commerce, Division of Energy Resources, the Office of the Attorney General, and the Citizens Utility Board of Minnesota *In the Matter of the Petition of Northern States Power Company d/b/a/ Xcel Energy for Approval of the Transmission Cost Recovery (TCR) Rider Revenue Requirements for 2023 and 2024, Tracker True-Up, and Revised Adjustment Factors*. July 31, 2024. Docket No. E-002/M-23-467. Page 20.

2025 implemented a broad set of changes designed to reduce disconnections that we believe should also lead to a reduction in complaints.¹⁰

Third, new requirements in the Commission's January 13, 2025 Order in the electric Safety, Reliability and Service Quality docket (E002/M-24-27) – while helpful to customers – could, at least in the short term, increase complaints until customers become more familiar with those changes. This could be the case, for example, if the Commission orders a new practice of reconnecting disconnected customers during extreme heat or poor air quality, who would then be disconnected again when those conditions have passed. This will likely generate a new round of complaints on disconnection, due to a practice that it will take customers some time to become accustomed to.

Fourth, the Company faces risks today that we did not in the past, such as increased wildfire risk due to climate change. To mitigate that risk, the Company expects in the coming years to implement practices currently largely unknown to our customers. Those include Wildfire Safety Operations (WSO), where the Company during high wildfire risk conditions temporarily deactivates the automated reclosing of breakers on the distribution system to reduce ignition risk. When a fault occurs, this requires manual inspection prior to reclosing, which is likely to lead to longer outages. In periods of extreme fire risk, we may implement Public Safety Power Shutoffs (PSPS), where we would as a last resort de-energize parts of our system until those conditions have passed. This setting requires a patrol of the entire system prior to reenergization, which may also lead to longer restoration periods. Both WSO and PSPS – while essential to mitigate fire risk and clearly in the public interest – are almost certain to lead to an increase in complaints, at least until our customers become familiar with them. These risks and risk mitigation measures were not contemplated in the 2005-2011 period on which the Customer Complaints standard is based.

Continuing to base the standard on data that does not reflect current conditions and makes it effectively unachievable does not – to echo the Department and OAG-RUD's argument above – provide the Company with regulatory certainty, nor ensure PIMs continue to incentivize behavior that is in the ratepayer interest.

For the above reasons, we propose to update the Customer Complaints threshold to 0.649 complaints per 1,000 customers, using the current method (1.5 standard deviations) and number of basis years (seven), but updating those basis years to 2018-2024 as shown in Table 5 above. This will give the Company a strong incentive to

¹⁰ As summarized in *Minnesota Disconnection Process* at [Payment Arrangements](#) | [Billing & Payment](#) | [Xcel Energy](#). See also the Company's March 3, 2025 Corrected Compliance Filing *In the Matter of Northern States Power Company d/b/a Xcel Energy's 2023 Annual Safety, Reliability, and Service Quality Report*. Docket No. E002/M-24-27 and E,G002/PR-24-02.

continue our efforts to resolve complaints before they come to the Consumer Affairs Office (CAO).

To effectuate this change, we propose amending the Minnesota Electric and Gas Rate Books, General Rules and Regulations (Section 6), Service Quality (Sheet No. 7.7) to read:

E. Under Performance Measures

1. Customer Complaints

This metric measures the number of Customer Complaints submitted by the Commission's Consumer Affairs Office. An under performance payment will be assessed in any year in which the number of complaints exceeds 0.649 complaints per 1,000 customers.

Exclusions

Customer complaints will be recorded and reported with no exclusions. The Company may request exclusion of Customer Complaints that the Company can demonstrate are the result of an event beyond the Company's control, which the Company took reasonable steps to address.

D. Clarifying Definition of Customer Complaints

Finally, we propose a clarification to the definition of Customer Complaint in the Tariff. We believe the Company should have the opportunity to attempt to resolve any customer complaint before it is brought to the CAO and added to the annual tally. It is our understanding that it is already the CAO's general practice to ask customers contacting the CAO with a concern or complaint if they have first contacted the Company to work through their concerns and if they have not, to ask them to do so. We agree with this practice, and propose the Commission provide clarity by making this explicit in the Tariff. We propose amending the Minnesota Electric and Gas Rate Books, General Rules and Regulations (Section 6), Service Quality (Sheet No. 7.2) to read:

7. *"Customer Complaint"* is defined as any complaint submitted, in writing, by US Mail, e-mail, or by fax, registered by the Minnesota Public Utilities Commission's Consumer Affairs Office to the Company, regarding a complaint submitted by an Xcel Energy customer in which the customer states a grievance related to the Company's provision of service to that customer, provided that the complaint has first been submitted to the Company and the customer has been unsuccessful resolving the complaint with the Company. General inquiries to the Consumer Affairs Office, where the customer has not requested to register a complaint, shall not be counted as Customer Complaints.

I. CONCLUSION

We appreciate this opportunity to provide our annual performance results under our QSP Tariff. We request that the Commission:

- Accept our QSP Tariff Annual Report for 2024;
- Approve our proposal for disbursement of the 2024 underperformance payments;
- Approve our QSP Tariff modifications outlined in Section VI and Attachment I.

Dated: May 15, 2025

Northern States Power Company

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	Standard
1. Customer Complaints to PUC													
Monthly	50	49	56	78	173	226	175	192	120	156	101	92	
YTD	50	99	155	233	406	632	807	999	1119	1275	1376	1468	≤ 383
													Standard is .2059 complaints per 1,000 customers
2. Telephone Response Time (Percent answered in ≤ 20 sec)													
Monthly	79.0%	77.3%	77.8%	74.1%	69.3%	71.5%	72.6%	74.5%	78.7%	96.2%	98.1%	98.1%	
											Yearly Average	79.7%	≥ 80%
3. Electric Reliability - SAIDI (Minutes)													
Monthly	3.02	2.40	3.52	7.33	11.19	20.93	18.64	14.30	7.86	8.86	4.97	5.22	
YTD	3.02	5.42	8.94	16.28	27.47	48.39	67.03	81.33	89.18	98.04	103.01	108.23	≤ 133.23 min
4. Electric Reliability - SAIFI (Outage Events)													
Monthly	0.03	0.03	0.04	0.08	0.13	0.19	0.15	0.12	0.09	0.09	0.05	0.06	
YTD	0.03	0.06	0.10	0.18	0.31	0.50	0.65	0.77	0.86	0.95	1.00	1.06	≤ 1.21 outage events
5. Gas Emergency Response Time (Minutes)													
Monthly	27.02	26.55	28.39	27.61	29.04	29.17	28.03	29.56	28.86	29.82	26.99	27.02	
											Yearly Average	28.13	≤ 60 min
6. Customer Outage Refunds													
			Number of Customers / Credits			Total Credits							
Six or More Service Outages			9,447			\$472,350							
Outages Lasting 24-Hours or Longer			1,429			\$71,450							
Consecutive Years of Outages			929			\$82,200							
Tracked Small Municipal Pumping Outages (A40)			1,123			\$112,300							
Untracked Small Municipal Pumping Outages (A40)			248			\$41,168							
Tracked Large Municipal Pumping Outages (A41)			560			\$112,000							
Untracked Large Municipal Pumping Outages (A41)			195			\$52,065							
Total			13,931			\$943,533							
7. Accurate Invoices (Percent of accurate invoices)													
Monthly	99.84%	99.79%	99.66%	99.78%	99.67%	99.67%	99.60%	99.58%	99.52%	99.34%	99.49%	99.70%	
YTD	99.84%	99.82%	99.77%	99.77%	99.75%	99.74%	99.72%	99.70%	99.68%	99.65%	99.63%	99.64%	> 99.3%
8. Invoice Adjustment Timeliness (Billing Periods)													
Monthly	1.70	1.73	1.58	1.36	1.41	1.27	1.33	1.41	1.50	1.42	1.30	1.77	
YTD	1.70	1.72	1.67	1.59	1.56	1.51	1.48	1.47	1.48	1.47	1.46	1.48	< 2.35 billing periods

Minnesota Public Utilities Commission
Consumer Affairs Office
121-7th Place East
St. Paul, MN 55101-2147

XCEL ENERGY TARIFF SERVICE QUALITY PLAN
SUMMARY OF CUSTOMER COMPLAINTS
For the period of January 01, 2024 to December 31, 2024
Filed in accordance with Docket No. E,G002/CI-02-2034 & E,G002/M-12-383

Name of Utility:
Address:
Prepared by:

Northern States Power Company, a Minnesota Corporation
3115 Centre Pointe Drive, Roseville, MN 55113
Robert Duenes, Customer Advocate Analyst, Customer Care (806)
513-1493

	1	2	3	4	5	6	7	8	9	10	11	12	Total	Standard
Customer Complaints to PUC														
Billing & Credit	28	31	32	49	139	187	144	120	83	131	73	66	1083	
Customer Service	5	9	6	7	5	12	2	2	3	1	2	4	58	
Meter Reading	1	0	0	1	2	1	0	4	0	2	2	1	14	
Reliability-Duration	0	1	0	0	0	0	3	2	1	0	0	1	8	
Reliability-Frequency	0	0	1	0	2	4	4	24	6	1	5	3	50	
Trouble Orders	0	0	0	2	0	2	1	1	0	0	0	0	6	
Other	16	8	17	19	25	20	21	39	27	21	19	17	249	
Monthly	50	49	56	78	173	226	175	192	120	156	101	92	1468	
YTD	50	99	155	233	406	632	807	999	1119	1275	1376	1468		<383

	All Residential Calls offered to Agents	All BSC Calls Offered to Agents	All Credit Calls Offered to Agents	All PAR Calls Offered to Agents	All Calls Offered to Agents	All Residential Calls Answered by Agents within 20 seconds	All BSC Calls Answered by Agents within 20 seconds	All Credit Calls Answered by Agents within 20 seconds	All PAR Calls Answered by Agents within 20 seconds	All Calls Answered by Agents within 20 seconds	Calis Handled by IVR	All Calls Offered to Agents + Calls Handled by IVR	All Calls Answered by Agents within 20 seconds + Calls Handled by IVR	Service Level
January	54,938	5,025	17,516	2,601	80,080	15,848	2,368	12,345	1,962	32,523	146,897	226,977	179,420	79.0%
February	56,183	5,934	18,061	2,658	82,836	12,022	1,885	11,589	1,841	27,337	161,294	244,130	188,631	77.3%
March	59,247	5,621	18,789	2,938	86,595	14,600	2,823	10,940	1,917	30,280	166,694	253,289	196,974	77.8%
April	64,921	5,567	26,448	4,429	101,365	13,824	2,840	7,982	1,396	26,042	189,744	291,109	215,786	74.1%
May	78,775	5,059	33,858	5,709	123,401	19,950	2,470	1,707	3,259	27,386	189,833	313,234	217,219	69.3%
June	77,480	4,455	27,253	4,798	113,986	22,312	2,205	1,589	2,698	28,804	184,566	298,552	213,370	71.5%
July	92,113	4,992	28,999	5,689	131,793	23,452	2,469	908	2,899	29,728	240,617	372,410	270,345	72.6%
August	101,284	4,771	28,573	5,485	140,113	28,408	2,908	1,008	2,839	35,163	271,786	411,899	306,949	74.5%
September	67,323	3,127	22,479	4,843	97,772	31,789	1,435	3,468	2,699	39,391	176,496	274,268	215,887	78.7%
October	71,246	3,859	21,008	3,646	99,759	65,302	2,695	18,756	2,523	89,276	176,168	275,927	265,444	96.2%
November	56,243	2,750	23,158	3,169	85,320	53,689	2,411	22,059	2,473	80,632	165,642	250,962	246,274	98.1%
December	52,241	2,859	20,933	2,965	78,998	50,105	1,742	20,083	2,477	74,407	161,213	240,211	235,620	98.1%
2023	831,994	54,019	287,075	48,930	1,222,018	351,301	28,251	112,434	28,983	520,969	2,230,950	3,452,968	2,751,919	79.7%

Notes:
The service level formula is: (All Calls Answered by Agents within 20 seconds +All Calls Handled by IVR) / (All Calls Offered to Agents + All Calls Handled by IVR)
Agent call volumes includes calls offered and handled at both company offices and at remote locations where agents work at home.
Data on calls to agents is gathered from the phone switch (Avaya) based on VDN's.
Data on IVR calls is gathered from the IVR reporting tool (Voice Portal).

2024 Xcel Energy Minnesota Tariff Reliability Indices
IEEE Normalized
All Causes, No Transmission Line Level

Minnesota	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	2024 YE	2024 YE	Deviation	2023 YE	2022 YE	2021 YE	2020 YE
													Actual	Target	From Target				
SAIDI	3.02	2.40	3.52	7.33	11.19	20.93	18.64	14.30	7.86	8.86	4.97	5.22	108.23	133.23	-25.00	82.47	87.92	87.97	95.52
SAIFI	0.03	0.03	0.04	0.08	0.13	0.19	0.15	0.12	0.09	0.09	0.05	0.06	1.06	1.21	-0.15	0.81	0.84	0.90	0.96
CAIDI	111.29	77.20	82.96	93.62	86.72	108.78	121.77	120.67	86.84	100.55	104.47	84.22	102.10	NA	NA	101.27	104.63	97.72	99.73
Cust Mins	4,087,794	3,254,141	4,774,672	9,952,351	15,212,558	28,456,141	25,353,197	19,500,091	10,733,519	12,106,870	6,789,449	7,153,534	147,374,317						
Cust Ints	36,731	42,154	57,555	106,308	175,414	261,587	208,199	161,601	123,599	120,407	64,987	84,937	1,443,479						
Cust Serv	1,353,455	1,354,646	1,356,262	1,357,000	1,359,424	1,359,858	1,360,472	1,363,999	1,365,987	1,366,497	1,367,312	1,369,108							
Metro East	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	2024 YE	2024 YE	Deviation	2023 YE	2022 YE	2021 YE	2020 YE
													Actual	Target	From Target				
SAIDI	3.93	1.40	3.25	10.99	12.24	25.38	15.53	13.74	8.02	7.77	7.86	4.75	114.86	NA	NA	103.97	96.62	81.96	104.56
SAIFI	0.04	0.02	0.04	0.13	0.13	0.21	0.13	0.10	0.08	0.07	0.06	0.05	1.07	NA	NA	0.98	0.89	0.83	0.99
CAIDI	105.66	78.05	90.26	83.51	91.32	122.82	118.22	131.66	98.95	106.15	127.16	89.67	107.53	NA	NA	106.55	108.37	98.36	105.19
Cust Mins	1,756,757	628,342	1,455,059	4,929,754	5,500,514	11,420,193	7,000,618	6,207,344	3,625,871	3,512,050	3,557,449	2,149,456	51,743,406						
Cust Ints	16,627	8,051	16,121	59,032	60,234	92,986	59,215	47,147	36,644	33,087	27,976	23,972	481,092						
Cust Serv	446,840	447,296	448,206	448,514	449,428	449,918	450,869	451,694	451,875	452,165	452,497	452,866							
Metro West	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	2024 YE	2024 YE	Deviation	2023 YE	2022 YE	2021 YE	2020 YE
													Actual	Target	From Target				
SAIDI	1.29	2.94	3.86	5.87	11.35	18.48	21.48	11.68	6.92	7.70	4.09	5.31	100.97	NA	NA	69.76	81.22	94.47	87.46
SAIFI	0.01	0.04	0.05	0.06	0.15	0.20	0.19	0.12	0.10	0.09	0.05	0.07	1.14	NA	NA	0.75	0.86	1.05	1.01
CAIDI	98.70	79.21	75.02	102.16	75.73	90.51	113.03	97.47	68.34	81.21	86.63	73.15	88.66	NA	NA	92.80	94.52	89.83	86.19
Cust Mins	830,004	1,893,930	2,487,862	3,786,254	7,332,478	11,950,939	13,868,027	7,565,450	4,489,576	4,996,519	2,657,123	3,457,539	65,315,698						
Cust Ints	8,409	23,909	33,163	37,062	96,820	132,043	122,697	77,622	65,690	61,525	30,672	47,266	736,878						
Cust Serv	643,423	643,821	644,242	644,509	646,219	646,862	645,475	647,777	649,236	649,160	649,503	650,645							
Northwest	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	2024 YE	2024 YE	Deviation	2023 YE	2022 YE	2021 YE	2020 YE
													Actual	Target	From Target				
SAIDI	9.60	0.77	4.75	3.90	10.83	10.35	10.80	23.49	13.01	17.57	2.13	6.36	113.57	NA	NA	80.18	79.19	89.90	100.31
SAIFI	0.06	0.01	0.05	0.03	0.07	0.12	0.06	0.15	0.09	0.11	0.03	0.06	0.83	NA	NA	0.77	0.63	0.63	0.75
CAIDI	158.00	92.59	102.34	134.48	152.09	87.90	188.98	158.35	146.73	159.09	62.61	112.83	137.08	NA	NA	103.91	125.90	141.66	133.14
Cust Mins	1,238,419	98,794	614,260	504,955	1,401,394	1,340,223	1,398,453	3,046,476	1,689,739	2,285,134	276,906	828,720	14,723,474						
Cust Ints	7,838	1,067	6,002	3,755	9,214	15,248	7,400	19,239	11,516	14,364	4,423	7,345	107,411						
Cust Serv	128,963	129,131	129,304	129,382	129,349	129,457	129,545	129,678	129,837	130,033	130,144	130,320							
Southeast	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	2024 YE	2024 YE	Deviation	2023 YE	2022 YE	2021 YE	2020 YE
													Actual	Target	From Target				
SAIDI	1.96	4.71	1.62	5.43	7.28	28.03	22.93	19.88	6.87	9.72	2.20	5.31	115.93	NA	NA	73.60	99.26	75.14	99.53
SAIFI	0.03	0.07	0.02	0.05	0.07	0.16	0.14	0.13	0.07	0.08	0.01	0.05	0.88	NA	NA	0.62	0.78	0.66	0.76
CAIDI	68.09	69.36	95.85	113.24	106.95	175.73	163.40	152.38	95.22	114.88	155.52	112.97	132.08	NA	NA	119.40	126.96	114.59	130.46
Cust Mins	262,614	633,075	217,491	731,388	978,173	3,744,786	3,086,100	2,680,822	928,334	1,313,167	297,972	717,819	15,591,739						
Cust Ints	3,857	9,127	2,269	6,459	9,146	21,310	18,887	17,593	9,749	11,431	1,916	6,354	118,098						
Cust Serv	134,229	134,398	134,510	134,595	134,428	133,621	134,583	134,850	135,039	135,139	135,168	135,277							

Note: IEEE 1366 normlization method applied after removing Transmission Line level events

Note: All causes are included

Note: Meter based customer counts

Note: Interruptions and customer counts associated with customers in the work region of North Dakota that are in Minnesota are included in the Northwest work region

Note: Interruptions and customer counts associated with customers in the work region of South Dakota that are in Minnesota are included in the Southeast work region

Major Event Days

Major Event Days (MEDs) are determined using the new tariff method based on IEEE after removing Trans Line level and Meter based counts

Metro East

5/21, 7/14, 8/26, 8/27, 8/29

Metro West

7/14, 8/5, 8/26, 8/27, 8/29,
10/31

Northwest

(Includes ND region customers/outages in MN)

6/12, 6/18, 7/14

Southeast

(Includes SD region customers/outages in MN)

5/21

YEAR: 2024

Job Code	Job Description	Call Count	Answer & Talk Time	Avg Answer & Talk Time	Dispatch Time	Avg Dispatch Time	Travel Time	Avg Travel Time	Total Response Time	Avg Response Time	# of Orders Responded to in <= 60 Minutes	% of Orders Responded to in <= 60 Minutes	# of Orders Responded to in >60 Minutes	% of Orders Responded to in >60 Minutes
EBG	Broken/Hit Gas Line	392	1,576	4.02	2,010	5.13	7,505	19.15	11,092	28.3	381	97.19	11	2.81
ECO	CO Check/Alarm	1343	5,228	3.89	9,810	7.3	22,346	16.64	37,383	27.84	1,320	98.29	23	1.71
EEX	Gas Explosion	2	8	4.06	8	4.15	61	30.45	77	38.66	2	100	0	0
EFI	Gas Fire	270	1,049	3.89	2,496	9.24	4,339	16.07	7,884	29.2	267	98.89	3	1.11
EIR	Ice Regulator	7	26	3.68	65	9.23	127	18.2	218	31.11	7	100	0	0
EOI	Smells Gas Inside	6137	23,887	3.89	43,032	7.01	104,750	17.07	171,669	27.97	6,031	98.27	106	1.73
EOO	Smells Gas Outside	4447	17,238	3.88	29,530	6.64	79,126	17.79	125,894	28.31	4,338	97.55	109	2.45
EPR	High / Low Pressure	418	1,578	3.78	2,446	5.85	7,422	17.75	11,445	27.38	412	98.56	6	1.44
ETX	CO Emergency	163	624	3.83	1,007	6.18	2,939	18.03	4,570	28.03	161	98.77	2	1.23
NOGAS	Customer Reports No Gas	840	3,236	3.85	6,197	7.38	14,691	17.49	24,124	28.72	821	97.74	19	2.26
All Gas Emergency Calls for 2024		14,019	54,450	3.88	96,600	6.89	243,307	17.36	394,357	28.13	13,740	98%	279	2%

The accurate invoice metric measures the percent of accurate invoices the Company issues to its customers. This is calculated by determining the number of invoices canceled for controllable reasons divided by the total number of invoices issued. The Company defines controllable reasons as: (1) human errors made by field or office personnel, (2) billing system and metering system communications errors and (3) malfunctioning meter equipment.

MN Only	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Annual Average	QSP 3 SD = 99.27 %
Actual Number of Invoices Cancelled for Controllable Reasons	2,952	3,662	6,158	4,339	6,430	6,100	7,765	8,523	8,529	13,567	9,030	5,783	6,903	
Total Number of Invoices	1,894,839	1,780,423	1,832,981	2,015,728	1,925,880	1,828,235	1,943,833	2,027,531	1,789,398	2,061,103	1,763,260	1,920,273	1,898,624	
Controllable % Error Free Invoices	99.84%	99.79%	99.66%	99.78%	99.67%	99.67%	99.60%	99.58%	99.52%	99.34%	99.49%	99.70%	99.64%	
YTD Average	99.84%	99.82%	99.77%	99.77%	99.75%	99.74%	99.72%	99.70%	99.68%	99.65%	99.63%	99.64%		

The accurate invoice metric measures the percent of accurate invoices the Company issues to its customers. This is calculated by determining the number of invoices canceled for controllable reasons divided by the total number of invoices issued. The Company defines controllable reasons as: (1) human errors made by field or office personnel, (2) billing system and metering system communications errors and (3) malfunctioning meter equipment.

MN Only	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Annual Average	PUC QSP 3 SD = 2.35
Total Number of Controllable Cancel Rebills	2,952	3,662	6,158	4,339	6,430	6,100	7,765	8,523	8,529	13,567	9,030	5,783	6,903	
Total Number of Months On Rebill	2,644	2,809	4,586	3,601	5,582	4,983	6,490	7,721	7,512	11,312	7,510	5,155	5,825	
Blling Periods on Rebilled Invoices (Controllable Adjustment Timliness)	1.70	1.73	1.58	1.36	1.41	1.27	1.33	1.41	1.50	1.42	1.30	1.77	1.48	
YTD Average	1.70	1.72	1.67	1.59	1.56	1.51	1.48	1.47	1.48	1.47	1.46	1.48		

Redline

Electric

GENERAL RULES AND REGULATIONS (Continued)

Section No. 6

3rd4th Revised Sheet No. 7.2

1.9 SERVICE QUALITY (Continued)

A. Definitions (continued)

5. "Average Number of Customers" [in the context of measuring SAIDI and SAIFI] is defined as the annual average of the monthly electric meter count from the Company's outage management system.

6. "Customer"

A. For purposes of calculating SAIDI and SAIFI, "Customer" is defined as an electric service meter.

B. For purposes of Customer Complaints, "Customer" is defined as an electric or a natural gas customer that receives a bill for utility service from the Company or a representative of that customer. A representative includes an individual designated with Power of Attorney for the Customer, an attorney retained to represent the Customer, or an individual authorized by the Customer to act on his/her account.

7. "Customer Complaint" is defined as any complaint submitted, in writing, by US Mail, e-mail, or by fax, registered by the Minnesota Public Utilities Commission's Consumer Affairs Office to the Company, regarding a complaint submitted by an Xcel Energy customer in which the customer states a grievance related to the Company's provision of service to that customer, provided that the complaint has first been submitted to the Company and the customer has been unsuccessful resolving the complaint with the Company. General inquiries to the Consumer Affairs Office, where the customer has not requested to register a complaint, shall not be counted as Customer Complaints.

Customer Complaints will be reported in the following categories:

- Billing & Credit
- Customer Service
- Meter Reading
- Trouble Orders
- Reliability Duration
- Reliability Frequency
- Other

This is calculated by dividing the total number of Customer Complaints in the performance year by the product of the total number of Minnesota customers, as reported in the Company's electric and gas jurisdictional reports, divided by 1,000.

8. "Customer Minutes" [in the context of measuring SAIDI and SAIFI] is defined as the total number of minutes of a service interruption multiplied by the total number of Customers experiencing the interruption. Customer Minutes include Step Restoration.

(Continued on Sheet No. 6-7.3)

Date Filed: 03-27-13 05-15-25

By: ~~David M. Sparby~~ Ryan J. Long

Effective Date: 08-12-13

President, and CEO of Northern States Power Company, a Minnesota corporation

Docket No. E,G002/CI-02-2034 & E,G002/M-12-383

Order Date: 08-12-13

GENERAL RULES AND REGULATIONS (Continued)

Section No. 6
~~3rd~~^{4th} Revised Sheet No. 7.7

1.9 SERVICE QUALITY (Continued)

E. Under Performance Measures

1. Customer Complaints

This metric measures the number of Customer Complaints submitted by the Commission's Consumer Affairs Office. An under performance payment will be assessed in any year in which the number of complaints exceeds ~~0-20590~~^{0,649} complaints per 1,000 customers.

Exclusions

Customer complaints will be recorded and reported with no exclusions. The Company may request exclusion of Customer Complaints that the Company can demonstrate are the result of an event beyond the Company's control, which the Company took reasonable steps to address.

2. Telephone Response Time

This metric measures the Company's time to answer customer calls directed to the Company's call center or to its business office. The benchmark is 80 percent of the calls are answered within 20 seconds. The under performance payment will be assessed in any performance year in which less than 80 percent of calls are answered within 20 seconds.

Exclusions

Telephone Response Time will be recorded and reported with no exclusions. The Company may request exclusion of certain calls that the Company can demonstrate are the result of an event beyond the Company's control, which the Company took reasonable steps to address.

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(Continued on Sheet No. 6-7.8)

Date Filed: ~~03-27-13~~ ⁰⁵⁻¹⁵⁻²⁵ By: ~~David M. Sparby~~ ^{Ryan J. Long} Effective Date: ~~08-12-13~~
President, ~~and CEO of~~ Northern States Power Company, a Minnesota corporation
Docket No. E,G002/CI-02-2034 & E,G002/M-12-383 Order Date: ~~08-12-13~~

Gas

MINNESOTA GAS RATE BOOK – MPUC NO. 2

GENERAL RULES AND REGULATIONS (Continued)

Section No. 6

~~2nd~~^{3rd} Revised Sheet No. 7.2

1.9 SERVICE QUALITY (Continued)

A. Definitions (Continued)

5. "Average Number of Customers" [in the context of measuring SAIDI and SAIFI] is defined as the annual average of the monthly electric meter count from the Company's outage management system.

6. "Customer"

A. For purposes of calculating SAIDI and SAIFI, "Customer" is defined as an electric service meter.

B. For purposes of Customer Complaints, "Customer" is defined as an electric or a natural gas customer that receives a bill for utility service from the Company or a representative of that customer. A representative includes an individual designated with Power of Attorney for the Customer, an attorney retained to represent the Customer, or an individual authorized by the Customer to act on his/her account.

7. "Customer Complaint" is defined as any complaint submitted, in writing, by US Mail, e-mail, or by fax, registered by the Minnesota Public Utilities Commission's Consumer Affairs Office to the Company, regarding a complaint submitted by an Xcel Energy customer in which the customer states a grievance related to the Company's provision of service to that customer. provided that the complaint has first been submitted to the Company and the customer has been unsuccessful resolving the complaint with the Company. General inquiries to the Consumer Affairs Office, where the customer has not requested to register a complaint, shall not be counted as Customer Complaints.

Customer Complaints will be reported in the following categories:

- Billing & Credit
- Customer Service
- Meter Reading
- Trouble Orders
- Reliability Duration
- Reliability Frequency
- Other

This is calculated by dividing the total number of Customer Complaints in the performance year by the product of the total number of Minnesota customers, as reported in the Company's electric and gas jurisdictional reports, divided by 1,000.

8. "Customer Minutes" [in the context of measuring SAIDI and SAIFI] is defined as the total number of minutes of a service interruption multiplied by the total number of Customers experiencing the interruption. Customer Minutes include Step Restoration.

(Continued on Sheet No. 6-7.2a)

Date Filed: ~~03-27-13~~ 05-15-25

By: ~~David M. Sparby~~ Ryan J. Long

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MINNESOTA GAS RATE BOOK – MPUC NO. 2

GENERAL RULES AND REGULATIONS (Continued)

Section No. 6

~~2nd~~^{3rd} Revised Sheet No. 7.7

1.9 SERVICE QUALITY (Continued)

E. Under Performance Measures

1. Customer Complaints

This metric measures the number of Customer Complaints submitted by the Commission's Consumer Affairs Office. An under performance payment will be assessed in any year in which the number of complaints exceeds ~~0.20590~~^{0.649} complaints per 1,000 customers.

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Customer complaints will be recorded and reported with no exclusions. The Company may request exclusion of Customer Complaints that the Company can demonstrate are the result of an event beyond the Company's control, which the Company took reasonable steps to address.

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This metric measures the Company's time to answer customer calls directed to the Company's call center or to its business office. The benchmark is 80 percent of the calls are answered within 20 seconds. The under performance payment will be assessed in any performance year in which less than 80 percent of calls are answered within 20 seconds.

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Telephone Response Time will be recorded and reported with no exclusions. The Company may request exclusion of certain calls that the Company can demonstrate are the result of an event beyond the Company's control, which the Company took reasonable steps to address.

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(Continued on Sheet No. 6-7.8)

Date Filed: ~~03-27-13~~ ⁰⁵⁻¹⁵⁻²⁵

By: ~~David M. Sparby~~ ^{Ryan J. Long}

Effective Date: ~~08-12-13~~

President, ~~and CEO of~~ Northern States Power Company, a Minnesota corporation

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Order Date: ~~08-12-13~~

Clean

Electric

1.9 SERVICE QUALITY (Continued)

A. Definitions (continued)

5. *"Average Number of Customers"* [in the context of measuring SAIDI and SAIFI] is defined as the annual average of the monthly electric meter count from the Company's outage management system.

6. *"Customer"*

A. For purposes of calculating SAIDI and SAIFI, "Customer" is defined as an electric service meter.

B. For purposes of Customer Complaints, "Customer" is defined as an electric or a natural gas customer that receives a bill for utility service from the Company or a representative of that customer. A representative includes an individual designated with Power of Attorney for the Customer, an attorney retained to represent the Customer, or an individual authorized by the Customer to act on his/her account.

7. *"Customer Complaint"* is defined as any complaint submitted, in writing, by US Mail, e-mail, or by fax, registered by the Minnesota Public Utilities Commission's Consumer Affairs Office to the Company, regarding a complaint submitted by an Xcel Energy customer in which the customer states a grievance related to the Company's provision of service to that customer, provided that the complaint has first been submitted to the Company and the customer has been unsuccessful resolving the complaint with the Company. General inquiries to the Consumer Affairs Office, where the customer has not requested to register a complaint, shall not be counted as Customer Complaints.

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Customer Complaints will be reported in the following categories:

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- Meter Reading
- Trouble Orders
- Reliability Duration
- Reliability Frequency
- Other

This is calculated by dividing the total number of Customer Complaints in the performance year by the product of the total number of Minnesota customers, as reported in the Company's electric and gas jurisdictional reports, divided by 1,000.

8. *"Customer Minutes"* [in the context of measuring SAIDI and SAIFI] is defined as the total number of minutes of a service interruption multiplied by the total number of Customers experiencing the interruption. Customer Minutes include Step Restoration.

(Continued on Sheet No. 6-7.3)

Date Filed: 05-15-25

By: Ryan J. Long

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Order Date:

1.9 SERVICE QUALITY (Continued)

E. Under Performance Measures

1. Customer Complaints

This metric measures the number of Customer Complaints submitted by the Commission's Consumer Affairs Office. An under performance payment will be assessed in any year in which the number of complaints exceeds 0.649 complaints per 1,000 customers.

Exclusions Customer complaints will be recorded and reported with no exclusions. The Company may request exclusion of Customer Complaints that the Company can demonstrate are the result of an event beyond the Company's control, which the Company took reasonable steps to address.

2. Telephone Response Time

This metric measures the Company's time to answer customer calls directed to the Company's call center or to its business office. The benchmark is 80 percent of the calls are answered within 20 seconds. The under performance payment will be assessed in any performance year in which less than 80 percent of calls are answered within 20 seconds.

Exclusions

Telephone Response Time will be recorded and reported with no exclusions. The Company may request exclusion of certain calls that the Company can demonstrate are the result of an event beyond the Company's control, which the Company took reasonable steps to address.

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(Continued on Sheet No. 6-7.8)

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Gas

MINNESOTA GAS RATE BOOK – MPUC NO. 2

GENERAL RULES AND REGULATIONS (Continued)

Section No. 6
3rd Revised Sheet No. 7.2

1.9 SERVICE QUALITY (Continued)

A. Definitions (Continued)

5. *"Average Number of Customers"* [in the context of measuring SAIDI and SAIFI] is defined as the annual average of the monthly electric meter count from the Company's outage management system.

6. *"Customer"*

A. For purposes of calculating SAIDI and SAIFI, "Customer" is defined as an electric service meter.

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- Trouble Orders
- Reliability Duration
- Reliability Frequency
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8. *"Customer Minutes"* [in the context of measuring SAIDI and SAIFI] is defined as the total number of minutes of a service interruption multiplied by the total number of Customers experiencing the interruption. Customer Minutes include Step Restoration.

(Continued on Sheet No. 6-7.2a)

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Order Date:

1.9 SERVICE QUALITY (Continued)

E. Under Performance Measures

1. Customer Complaints

This metric measures the number of Customer Complaints submitted by the Commission's Consumer Affairs Office. An under performance payment will be assessed in any year in which the number of complaints exceeds 0.649 complaints per 1,000 customers.

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Exclusions

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(Continued on Sheet No. 6-7.8)

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By: Ryan J. Long

Effective Date:

President, Northern States Power Company, a Minnesota corporation

Docket No. E,G002/CI-02-2034 & E,G002/M-12-383

Order Date:

CERTIFICATE OF SERVICE

I, Victor Barreiro, hereby certify that I have on 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 NOS. E,G002/CI-02-2034 AND E,G002/M-12-383

Dated this 15th day of May 2025

/s/

Victor Barreiro
Regulatory Administrator

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Olivia	Carroll	oliviac@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St W1360 St. Paul MN, 55101 United States	Electronic Service		No	2-20341
2	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	2-20341
3	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		Yes	2-20341
4	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	2-20341
5	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	2-20341
6	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	2-20341
7	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States	Electronic Service		No	2-20341
8	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	2-20341
9	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	2-20341
10	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	2-20341
11	Rebecca S.	Winegarten	beckwine@msn.com	Unknown		10555 Union Terrace Ln N Maple Grove MN, 55369-2622 United States	Electronic Service		No	2-20341

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar		721 W 26th st Suite 211 Minneapolis MN, 55405 United States	Electronic Service		No	12-383Official
2	Laura	Beaton	beaton@smwlaw.com	Shute, Mihaly & Weinberger LLP		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	12-383Official
3	Olivia	Carroll	oliviac@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St W1360 St. Paul MN, 55101 United States	Electronic Service		No	12-383Official
4	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	12-383Official
5	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	12-383Official
6	Allen	Gleckner	agleckner@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	12-383Official
7	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	12-383Official
8	Craig	Johnson	cjohnson@lmc.org	League of Minnesota Cities		145 University Ave. W. Saint Paul MN, 55103-2044 United States	Electronic Service		No	12-383Official
9	Cliff	Kaehler	cliff.kaehler@novelenergy.biz	Novel Energy Solutions LLC		4710 Blaylock Way Inver Grove Heights MN, 55076 United States	Electronic Service		No	12-383Official
10	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	12-383Official
11	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	12-383Official
12	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	12-383Official
13	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis	Electronic Service		No	12-383Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55402 United States				
14	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401- 1993 United States	Electronic Service		No	12- 383Official
15	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	12- 383Official
16	Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	12- 383Official
17	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	12- 383Official