



414 Nicollet Mall
Minneapolis, MN 55401

June 24, 2024

—Via Electronic Filing—

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

RE: REPLY COMMENTS
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

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy (Company), submits the enclosed Reply Comments in response to the Minnesota Public Utilities Commission's (Commission) April 26, 2024 Notice of Comment Period. The Company specifically provides the enclosed Reply Comments in response to Comments submitted by the Minnesota Department of Commerce (Department), as well as the Citizens Utility Board of Minnesota (CUB) and Energy CENTS Coalition (ECC)(together, the Joint Commenters).

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 Nathan Kostiuk at nathan.c.kostiuk@xcelenergy.com at or (612) 215-4629 or contact me at bridget.dockter@xcelenergy.com or (612) 337-2096 if you have any questions regarding this filing.

Sincerely,

/s/

BRIDGET DOCKTER
MANAGER, POLICY & OUTREACH

Enclosure
cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Valerie Means	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF NORTHERN STATES
POWER COMPANY D/B/A XCEL
ENERGY'S 2023 ANNUAL SAFETY,
RELIABILITY, AND SERVICE QUALITY
REPORT

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REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy (Company), submits these Reply Comments in response to the Minnesota Public Utilities Commission's (Commission) April 26, 2024 Notice of Comment Period. The Company specifically provides these Reply Comments in response to Comments submitted by the Minnesota Department of Commerce (Department), as well as the Citizens Utility Board of Minnesota (CUB) and Energy CENTS Coalition (ECC)(together, the Joint Commenters).

COMMENTS

We appreciate the recommended approval of our 2023 Annual Safety Report, our 2023 Service Quality Report, and our Equity Analysis by the Department. Additionally, we appreciate the thoughtful dialogue with the Joint Commenters to discuss their areas of concern. We will respond to each party below.

I. RESPONSE TO CUB AND ECC AS THE JOINT COMMENTERS

The Company and Joint Commenters have worked together to come to an agreed upon resolution of some matters addressed in their Comments and will continue discussions on others in an attempt to resolve remaining gaps in our positions. We appreciate the Joint Commenters continued willingness to work together on these matters.

A. Reconnecting AMI Meter Customers During Extreme Heat Events

Xcel Energy appreciates the support by ECC and CUB of our proposal to remotely reconnect AMI metered customers during excessive heat events who had been remotely disconnected prior to the event.

B. Extending Protections to Include Air Quality Alerts

The Company continues to engage in ongoing conversations with the Joint Commenters regarding their request to include air quality index (“AQI”) alerts and if/how this may be incorporated into a reconnection process for customers with AMI meters that have been disconnected remotely. The Joint Commenters recommend an option for customers with air quality health concerns to use air conditioning or other electric means of a cooling system indoors at their home, evacuation centers, or public buildings. Of note, as with the proposal for remotely reconnecting customers with an AMI meter, these customers must be originally disconnected remotely to utilize the remote reconnection function.

C. Final Call Protection Measures

The Company and Joint Petitioners will continue discussion on this matter. However, the Company continues to believe our currently approved nine-week customer communication process and the additional call that may include a voicemail prior to disconnection of services provides adequate notice to our customers in lieu of a field visit.

In our May 20, 2020 Original Petition we requested, amongst other things, a permanent variance to Minn. R. 7820.2500 that requires a field visit be performed prior to a customer disconnection¹.

On March 22, 2023, the Commission approved our Petition. Order point 1 states:

The Commission grants the petition of Northern States Power Company d/b/a Xcel Energy for a temporary variance to Minn. R. 7820.2500 for customers subscribed to Residential Service, Residential Time-of-Day Service, Small General Service, or Small General Time of Day Service. The variance may commence within 30 days and shall be reevaluated annually in the

¹ 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; May 20, 2022; Docket No. E002/M-22-233.

Company's service quality reporting dockets until the variance is made permanent or terminated.²

In their Comments, the Joint Commenters expressed that they no longer believe leaving the final voicemail adequately provides the customer with the opportunity to take preventative measures prior to disconnection. While we can appreciate the Joint Commenters concerns, we do believe that at the end of a nine-week outreach, wherein the Company informs and communicates with the customer via multiple channels, our last call process is adequate. The last call may include either a direct phone contact with the customer, leaving a voicemail at the last known contact phone number we have on file, or if we cannot reach the customer via either of these channels, we will send a field representative to the customer's home in a final contact attempt prior to disconnection.

Our records indicate that customers simply do not answer their phones often when we call. Our 2024 data shows that, for our first call attempts, we were only able to speak to customers directly approximately eight percent of the time. On the other hand, 77 percent of the first calls to customers are left on a voicemail, and four percent of customers answered the door to a field agent. A customer can retrieve a voicemail either from their home or remotely and take steps to protect their account from disconnection activity. When comparing the effectiveness of a field representative visit to a first call, both yield similar results. Analyzing the data for 2022, the last full year the Company was required to perform field representative visits for all disconnections, customers answered the door 7.9 percent of the time. Reviewing 2024 year-to-date first call data shows customers answered that call 8.1 percent of the time.

Table 1 below illustrates 2024 year-to-date data.

² Commission Order, pg. 10, March 22, 2023 Docket No. E002/M-22-233.

Table 1
2024 1st Call Minnesota

Month	Call Attempts	Answered	Delivered to Voicemail	Answered	Delivered to Voicemail
Jan	48,275	3,704	37,454	7.7%	77.6%
Feb	38,569	3,247	29,635	8.4%	76.8%
Mar	49,946	4,006	38,366	8.0%	76.8%
Apr	59,279	5,145	45,231	8.7%	76.3%
May	48,339	3,670	37,269	7.6%	77.1%

Recent data also reveals a declining trend in the percentage of customers that answer the door for field representative visits. This demonstrates that performing additional field visits would not be a more effective way to contact customers. Table 2 shows the downward trend. In other words, 2024 year-to-date data shows 96 percent of the time field representatives are unable to contact customers through this avenue.

Table 2
Customers Present for Field Representative Visits

Pre-2020	2022	2023	2024 YTD
Approximately 10%	7.9%	6.9%	4.0%

Customers can call our offices to make arrangements for their past due amount, at any time, from anyplace. Alternatively, if a customer works away from their home during the day, they would not be aware of a physical visit to their property until they return, missing the opportunity to make arrangements to avoid disconnection. Customers must have accountability to pay for the service they are provided, and if they need help, they are offered multiple opportunities to make contact with the Company to establish a payment plan or seek assistance.

Within our May of 2020 Petition, we described the nine-week customer outreach process undertaken prior to disconnection. Under the current Commission’s approved variance, our remote service reconnect/disconnect process remained the same, except replacing the final field visit, where we would leave a door hanger if the customer did not answer the door, with a phone call, active voicemail, or field visit is no contact via phone or voicemail was made. Prior to implementing the variance process, field agents visited a customer's home before disconnection. We indicated in the original petition (using pre 2020 data) that when a field agent performed a home visit, our records show that customers answer the door approximately ten percent of the time. Of that ten percent, approximately 18 percent of the time the customer will pay their bill in full.

In all situations with our past-due customers, we continue to incorporate our guiding principles. This includes, contacting the customer to resolve past due bills and entering them into payment arrangements as our priority. Our customer contact and outreach process is discussed below.

Customer Contact & Outreach Process

Customers with past due bills are contacted multiple times to resolve the balance and avoid disconnection of service. Typically, a customer's balance is least 60 days past due before a disconnection would occur. The process we use to contact customers is generally as follows:

Monthly Billing Statement. Each month customers are provided with a monthly statement detailing current usage and associated charges for services provided to their home. Billing Statements are delivered via USPS or electronically, depending on the customer's preferred billing communication method, and include a due date for charges along with contact information for the Company. Billing statements that include past due charges from previous months include specific call outs and messaging reflecting the account's status and the need for immediate contact with the Company for resolution. Billing statements are included in Section No. 8 of our Electric Rate Book.³

Courtesy Past Due Reminders. We contact the customer through emails, text message and/or phone calls if the customer is past due and has a past due balance of at least \$50. During these phone calls, our employees attempt to resolve the past due balance, offer payment plans, and refer customers to energy assistance resources as appropriate. These contacts typically occur weekly until the balance is resolved. Generally, these emails and phone calls are repeated for nine or more weeks before a disconnection notice is sent.

Disconnection Notice. Notices are mailed via USPS to customers who have a qualifying past due balance. Currently, the past due portion of a customer's bill must be at least \$180 to be subject to a Disconnection Notice. The official Disconnection Notice is included in Section No. 8, Sheet No. 6 in our Electric Rate Book.⁴

"1st Calls After Receiving a Disconnection Notice." Mandated phone calls are placed to any customer who has received a past due disconnection notice and is in jeopardy of disconnection. During these phone calls, our employees attempt to






³ https://www.xcelenergy.com/staticfiles/xcel/PDF/Regulatory/Me_Section_8.pdf.

⁴ *Id.*

resolve the past due balance, offer payment plans, and refer customers to energy assistance resources as appropriate.

“2nd Calls After Receiving a Disconnection Notice.” As proposed, this phone call would be our final attempt to contact the customer prior to the disconnection being assigned to the system. This applies only to customers not reached in a “1st Call.”

Outreach timeline and forms of communication to customers

Tactic	Missed payment	Week 1	Week 2	Week 3	Week 4	Week 5	Week 6	Week 7	Week 8	Week 9
		Email				Email		Email		Email
					Disconnection Notice					
		Call	Call	Call	Call	Call	Call	Call	Call	Call
					Bill Displaying Past Due Charges				Bill Displaying Past Due Charges	
										Phone Call Disconnect Remotely Reconnect Remotely'

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Access to payment Options

Customers have access to their account information and the ability to make payments 24 hours a day, seven days a week utilizing the automated phone system or online system for their account. These systems also allow customers to set payment plans that will stop the disconnection process. Customers can also contact our call center between 7:00 am and 6:00 pm, Monday through Friday, and 9:00 am and 4:00 pm on Saturdays to speak directly with an agent.

The Joint Commenters expressed concern for the adequacy of consumer protections when leaving a voicemail, specifically, that we cannot know for certain that a customer has listened to it. While we are unable to determine if a customer has listened to any voicemail left for them regarding their account, we can verify if the voicemail was delivered. Similarly, email notifications, letters and notices are also methods utilized by the Company to relay information to a customer or advise them that action is needed for payment or adjustment of their account. Verification of sending and/or delivery

of these kinds of notices can also be verified.

Adding Consumer Protections

Extending the Disconnection Notice Timeframe

As an additional consumer protection practice, we will immediately extend the time between a customer disconnection notice sent and an actual disconnection from five business days to ten business days.

Enhancing the Medical Certification Process

The Joint Commenters speak to an example of a customer with medical needs and an expired medical certification, facing disconnection. We provide information about our medical certification process for additional context and will add two customer assistance processes to help them move their applications to completion and apprise them of the status.

Customers with a verified medical designation are alerted 30 days before their certification form expires to allow them time to resubmit another medical form. A letter is sent to the property advising them of the verification expiration and required steps to maintain protections. Customers who have this medical designation are expected to set and maintain a payment plan that fits within their budget and/or apply for and receive energy assistance to help pay their bill.

To engage customers who have not participated in obtaining a medical designation before, the Company provides educational materials each fall in customer billing statements. This ensures that all residential customers are informed about available medical protection options, even if they have not sought such information previously.

We are adding two customer assistance processes to aid in application completion and status communication. First, the Personal Accounts team will begin providing telephone or email notifications to customers to indicate if their medical form has been approved or denied.

Second, and as discussed in detail below in response to the Departments request for further information on the “direct submit” process, we are enhancing the medical certification process through the direct submit option, with the goal of increasing our approval rate.

II. RESPONSE TO DEPARTMENT OF COMMERCE

We respond to individual topics mentioned by the Department below.

A. Metering Reading

As the Department indicated, our 2023 residential and commercial performance declined as compared to 2022 levels, while our industrial performance improved. In 2023 we continued experiencing supply chain challenges related to obtaining parts from our AMR vendor for legacy meters. This resulted in a significant decrease in automated read performance and driving our inability to receive and exchange meters/modules that were not transmitting. This ultimately caused an increase in “No Read Return” estimates. Looking forward by the end of Q1 2024, most of the supply chain issues we had experienced that contributed to the decreased meter performance have been resolved and inventory levels have returned to normal for most meter types.

We discussed in our Service Quality Annual Report, as the Company transitions to AMI, we anticipate a more cohesive meter network to allow more system readings of the smart meters, decreasing our need to estimate bills or send field personnel to our customers’ homes. Because the network mesh that connects the data to and from our customers is Company owned, when issues arise, the Company can address the matter immediately rather than utilizing a third-party vendor. As with any new technology roll-out and as indicated in our AMI proceedings, we expect some initial metering challenges during deployment but see any issues as temporary.

B. Customer Disconnections

We appreciate the Department’s analysis of our disconnection and reconnection trending between 2022-2023 and on a three-year 2020-2022 average. The results illustrate the impacts of the COVID-19 pandemic as an outlier from other data. For that reason, we do not believe using three-year average data that covers the length of the pandemic, provides a reasonable comparison. When comparing 2022 to 2023 data, an additional 16 percent of residential customers were issued disconnection notices. In 2023, the extra federal LIHEAP funding that had been available throughout the pandemic was significantly cut, decreasing assistance resources to our customers in need. We have discussed at length that the technology capabilities of AMI meters allow for disconnections using less field staff resources and these disconnections may touch customers who have not or seldom been disconnected before due to resource constraints. The disconnection itself also provides the opportunity to connect with customers who have not responded to us before in hopes of guiding them to resources and establishing payment plans that help will keep them out of the disconnection cycle.

Included in the increase in disconnections is also a significant increase in customer restoration within 24 hours by entering a payment plan. Again, indicating customers are contacting us to establish payment plans and seek help to pay their utility bill. As we look to 2024, our disconnection rates are projected to remain consistent with 2023 levels, but we are showing both a decrease in the number of past due customers and past due dollars over this time in 2023, even reflecting a \$3 million decrease in LIHEAP funding to date.⁵

C. Customer Satisfaction Reporting

The Department noted customer satisfaction information they believed to be missing from our Annual Report. Specifically:

Two recent Commission Orders include the reporting requirements regarding this topic. i. Order Accepting Reports (Docket Nos. E002/M-216-281 and E002/M-17-249), issued February 9, 2018 ii. Order Accepting Reports, Setting Filing Requirements, and Granting Withdrawal of Reconnect Pilot Proposal (Docket No. E002/M-18-239), issued May 14, 2019 In the first Order, the Commission required Xcel to provide “the Company’s internal customer satisfaction goals and a comparison of the Company’s actual performance to those goals, as well as an explanation of the basis for those goals.” In the second, the Commission required Xcel to “provide refreshed information responsive to the Commissions February 9, 2018, Order in future annual service-quality filings.” Xcel didn’t provide the internal goals information in the 2023 SRSQ filing. The Commission did require the Company to provide similar, if not identical information in its Annual Performance Based Ratemaking Annual Compliance Filing in Docket No. E002/CI-17-401.²⁷ Given that combination of a new Commission Order on the topic and Xcel’s decision to only report that information once in its Performance Based Ratemaking annual compliance filing, the Department inferred that the two reporting requirements listed for the SRSQ have been superseded formally or informally. If the Department’s reasoning is incorrect, we would ask the Commission to request Xcel provide that information in its 2025 SRSQ.⁶

The Commission’s October 20, 2023 Order, Order Point 1, in Docket No, E002/M-22-162 removes these requirements. As such, we did not include them in the filing. For additional context, on October 2nd, 2023, the Company filed Proposed Alternative

⁵ See our January 18, 2024 and June 18, 2024 *Residential Customer Status Reports* in Docket Nos. E,G999/CI-23-2 and E,G999/CI-24-2, respectively.

⁶ Department of Commerce, June 14, 2024 Comments, pg. 28, Docket No. E002/M-24-27.

Decision Options that provides background on this Order Point:

*Order Point 1 States, “Rescinded the requirement of Ordering Paragraph 3.E of the Commission’s February 9, 2018, Order in Docket Nos. E002/M-16-281 and E002/M-17-249 that Xcel Energy report on the Company’s internal customer satisfaction goals and a comparison of the Company’s actual performance to those goals as well as an explanation of the basis for those customer satisfaction goals in future annual service-quality filings.”*⁷

D. Incremental Cost Estimates to Achieve 1st Quartile IEEE Standard

The Department expressed concerns with the method the Company used to calculate customer benefits of achieving 1st quartile reliability performance. The Company utilized the Interruption Cost Estimate (ICE)⁸ tool which was developed by Lawrence Berkeley National Laboratory (LBNL) with funding from the Energy Resilience Division of the US Department of Energy’s Office of Electricity. The model is based on over 100,000 customer responses from 34 utility-sponsored surveys. LBNL states that “the ICE Calculator is relied upon across the country to inform major decisions on investments to improve grid reliability and resilience”

The Department of Commerce highlighted a difference between the ICE Calculator estimate of \$350/interruption/customer and the customer outage credits established in the Company’s tariff. However, the noted \$50 credit to customers experiencing six or more service interruptions in a year is designed as a performance incentive mechanism for the Company and not intended to compensate for economic losses incurred by the customer. Another factor limiting comparison is that the economic value of reliability improvements estimated by the ICE calculator are mostly attributed to commercial and industrial customers, whereas the vast majority of outage bill credits accrue to residential customers. The Company believes these differences make separate evaluation utilizing the ICE calculator necessary to appropriately calculate economic benefits of achieving IEEE 1st quartile performance.

III. ADDITIONAL INFORMATION REQUESTED BY THE DEPARTMENT

The Company provides the additional information requested by the Department below.

⁷ Proposed Alternative Decision Options Re: Staff Briefing Papers Decision Options October 5, 2023 Minnesota Public Utilities Commission Agenda Meeting 2021 Annual Service Quality Report; Docket No. E002/M-22-162, October 2, 2023.

⁸ [Upgrade for Tool to Estimate Power Interruption Costs | Energy Analysis & Environmental Impact Division \(lbl.gov\)](#)

A. Provide an estimate of the costs and benefits of upgrading its current website platform such that it would allow for a “direct submit” option for the Medically Necessary Equipment and Emergency Certification Form (or commit to providing that information in its 2024 Report).

While the Department notes it is supportive of our progress on exploring a “direct submit” option, they also requested the Company provide additional information relative to the costs and benefits of adding a direct link on our website either in Reply Comments or in our Xcel’s 2024 calendar year SRSQ filing. The information is intended to provide a general process and high-level cost estimate to add a “direct submit” option to our website.

Until a very recent enhancement, a “direct submit” form option was not available on our website platform. For that reason, we established a process that allows customers to download a PDF copy of the form and either print or send it to their medical professional for authorization.

With the new platform capabilities, the Company is developing an option for customers to access, complete, and directly submit the medical certification form on our Xcel Energy website, automatically delivering it to our Personal Accounts team. Once the form is received by the Personal Accounts team, a representative from the team can contact the customer directly to help finalize the medical form and resolve any open information that would leave an application in an “incomplete” status, halting benefits. Our Team representative can then send the form directly to the customer’s medical provider. This new process should increase overall participants receiving these customer protections, decreasing denials due to incomplete applications that are not followed up on by the customer. Overall, the new process provides a more customer service focused experience, especially for those who are unable to drive or have disabilities that may hinder their ability to complete the process under its current steps. A very high-level estimate to develop this website enhancement is a one-time cost of approximately \$50,000 that can be completed in Q4, 2024.

B. Whether the Company has complied with the Commission’s requirement that its “Summary of Key Customer-Service Quality and Reliability Metrics” is

on the Company’s home page or one click away⁹.

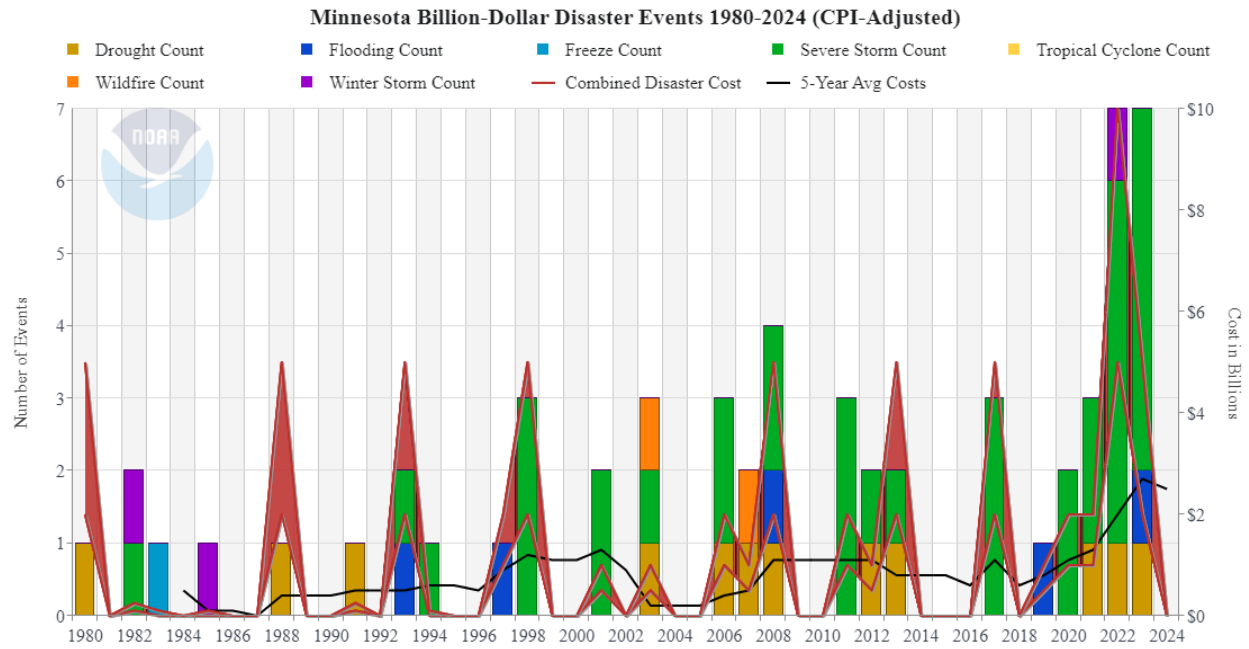
The Company’s Service Quality Reliability Metrics Summary (titled, Service Quality Info Sheet) can be accessed from our home web page, click on outage and safety, then how we restore power¹⁰. The summary sheet itself is two-clicks from our home web page. While establishing the posting site, the Company believed it to be most intuitive for customers to find this information in the reliability related section of our website. Specifically, we believe it is more appropriate to post the Info Sheet outside of the active outage reporting or mapping page that directly relates to current outage status and include it in the general reliability and other information related to power restoration page. This page is two clicks from the main webpage. If the Commission would prefer we move the position on our website to one click from the homepage, we will move it to the Outage and Safety page that provides active outage information.

C. Additional information on the increases in the reported and unreported Major Service Interruptions in 2023 and any efforts the Company could take to improve those results.

The number of major service interruptions will fluctuate annually and is largely dependent on weather and storm related system impacts which have been significant in the past two performance years. The impacts of these storm events are reflected in the fact that the Company’s reported All Days SAIDI and CAIDI in 2022 and 2023 exceed all of the values for the prior five years in Minnesota. Further, the large increase in the number of high impact severe storms in 2022 and 2023 can be seen in the chart below and compared to historical averages. It should be noted that the data shown from the National Oceanic and Atmospheric Administration (NOAA) National Centers for Environmental Information is not specific to electric supply systems and intended to represent economic damages as a whole.

⁹ The Commission’s November 9, 2022 Order in Docket No. E-002/M-22-162, Order Point 8, required Xcel Energy to 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.”

¹⁰ <https://mn.my.xcelenergy.com/s/outage-safety/restore-power>



Credit: National Centers for Environmental Information, NOAA¹¹

The causes of the recent increases in Major Service Interruptions are largely related to weather conditions outside the Company’s control. However, the Company is taking actions to reduce these impacts. One significant example is the ongoing deployment of distribution feeder level fault location, isolation, and service restoration (FLISR) technology which is anticipated to reduce the number of outage events meeting the size and duration definitions for Major Service Interruptions in future years.

With regard to the number of unreported events, the Company noted in our filing, “We are committed to providing the CAO [Consumer Affairs Office] with timely and accurate information. Our Customer Advocate Group generally sends these notifications via e-mail directly to the CAO with the required information, to the extent known.”¹² Additionally, “As with any process that involves human intervention and handoffs, errors will occur, and notices may not be sent to the CAO. There are instances when the Control Center may not create a notice, or the Company’s Customer Advocates do not receive a notice to forward to the CAO.”¹³ These instances can also be impacted by the larger quantity of outages associated with major storm events, the duration of such events or the close proximity in timing of events within the same area.

¹¹ <https://www.ncei.noaa.gov/access/billions/state-summary/MN>

¹² 2023 Service Quality Annual Report, pg. 73, Docket No. E002/M-24-27.

¹³ 2023 Service Quality Annual Report, pg. 74, Docket No. E002/M-24-27.

One ongoing effort that is anticipated to yield improved contemporaneous reporting is the Company's AMI deployment. That system is providing more complete information on outage extent to the Outage Management System (OMS) through outage reports by individual meters. Historically outage extent has been inferred by the OMS from outage reports, largely customer phone calls, which can be inconsistent in nature.

Additionally, the Customer Advocate Group and the Control Center will work to establish a process to increase communications with the goal of decreasing unreported Major Service Interruptions.

D. A discussion of how Xcel could determine whether the higher level of disconnections in high percent POC neighborhoods is due to the differential application of disconnection policies or to a difference in non-payment rates.

The Department also recommends the Commission approve our proposal to use targeted outreach to lower disconnection rates in the high percent POC neighborhoods and report on its efforts in its 2025 SRSQ Report or another docket if the Commission prefers. That targeted outreach proposal includes utilizing available tools such as the existing Service Quality Interactive Map and work with community-based organizations that help bring assistance directly to neighborhoods we serve. Additionally, we can utilize our most successful outreach campaigns through social media platforms, telephone, email and direct mail which will be developed and slotted to begin at least 30-45 days prior to the beginning of the upcoming LIHEAP season and will last throughout the 2024-2025 season.

The Company has started a pilot project focused on keeping our customers in the payment plans they set up. This initiative assists customers with past due balances over \$5,000 by removing one late payment charge with each payment made in their payment plan, up to six total.

CONCLUSION

Xcel Energy is committed to providing our customers with safe, reliable, and quality customer service. We appreciate the thoughtful review of our 2023 Annual Electric Service Quality Report by the Joint Commenters and the Department, as well as the opportunity to respond to their Comments submitted in this docket. In response to stakeholder concerns, we have added consumer protections related to the medical certification process and extended the time between the disconnection notice sent and disconnection occurring. We will continue to discuss the additional concerns the Joint Commenters have expressed to try and resolve these issues.

We believe we have met the requirements of the Report and request the Commission accept our 2023 Annual Report on electric safety, reliability, and service quality as detailed in our April 1, 2024 filing.

Dated: June 24, 2024

Northern States Power Company

CERTIFICATE OF SERVICE

I, Christine Schwartz, 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. E002/M-24-27

Dated this 24th day of June 2024

/s/

Christine Schwartz
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-27_Official
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_24-27_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-27_Official
George	Crocker	gwillc@nawo.org	North American Water Office	5093 Keats Avenue Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_24-27_Official
Christopher	Droske	christopher.droske@minneapolis.mn.gov	City of Minneapolis	661 5th Ave N Minneapolis, MN 55405	Electronic Service	No	OFF_SL_24-27_Official
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_24-27_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_24-27_Official
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_24-27_Official
Shubha	Harris	Shubha.M.Harris@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 401 - FL 8 Minneapolis, MN 55401	Electronic Service	Yes	OFF_SL_24-27_Official
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_24-27_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_24-27_Official
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_24-27_Official
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-27_Official
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-27_Official
Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-27_Official
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_24-27_Official
Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_24-27_Official
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_24-27_Official
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_24-27_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_24-27_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-27_Official
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-27_Official
Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_24-27_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_24-27_Official
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_24-27_Official
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_24-27_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-27_Official
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_24-27_Official
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-27_Official
Lauren	Steinhaeuser	lauren.steinhaeuser@xcelenergy.com	Northern States Power Company dba Xcel Energy	414 Nicollet Mall, 401-08 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_24-27_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-27_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_24-27_Official
Carla	Vita	carla.vita@state.mn.us	MN DEED	Great Northern Building 12th Floor 180 East Fifth Street St. Paul, MN 55101	Electronic Service	No	OFF_SL_24-27_Official
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-27_Official
Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_24-27_Official
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-27_Official