

## Staff Briefing Papers: Volume 2

Meeting Date	December 19, 2019	Agenda Item **7
Company	Northern States Power Company d/b/a Xcel Energy, Minnesota Power, and Otter Tail Power Company.	
Docket No.	<b>E002/M-19-261 In the Matter of Xcel Energy’s 2018 Annual Service Quality Performance Report and Proposed Reliability Measures</b> <b>E017/M-19-260 In the Matter of Otter Tail Power Company’s 2018 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI, and CAIDI Reliability Standards for 2019</b> <b>E015/M-19-254 In the Matter of Minnesota Power’s 2019 Safety, Reliability and Service Quality Standards Report</b>	
Issues	<ol style="list-style-type: none"><li>1. Should the Commission accept the portion of the utilities’ annual Safety, Reliability, and Service Quality reports for 2019 related to disconnection, extension service requests, call center response times, medical account status, and customer complaints?</li><li>2. Should the Commission take any other action on the Annual Reports or associated matters?</li></ol>	
Staff	Kelly Martone <a href="mailto:kelly.martone@state.mn.us">kelly.martone@state.mn.us</a>	651-201-2245

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<b>Relevant Documents</b>	<b>Date</b>
<b><i>Xcel Energy (19-261)</i></b>	
Initial Filing – 2018 Annual Safety, Reliability, and Service Quality Report	April 1, 2019
Department of Commerce – Comments	June 6, 2019
Xcel Energy – Reply Comments	June 28, 2019
Department of Commerce – Response to Reply Comments	August 14, 2019
<b><i>Otter Tail Power (19-260)</i></b>	
Initial Filing – 2018 Annual Safety, Reliability, and Service Quality Report	April 1, 2019
Department of Commerce – Comments	June 6, 2019
Otter Tail Power – Reply Comments	June 28, 2019
<b><i>Minnesota Power (19-254)</i></b>	
Initial Filing – Safety, Reliability, and Service Quality Standards Report	April 1, 2019
Department of Commerce – Comments	June 7, 2019
Minnesota Power – Reply Comments	July 8, 2019
Department of Commerce – Response to Reply Comments	September 16, 2018

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

## Table of Contents

<b>I. Statement of the Issues</b> .....	4
<b>II. Introduction</b> .....	4
<b>III. Reporting Standards</b> .....	4
<b>A. Meter Reading Performance (7826.1400)</b> .....	4
1. Xcel Energy.....	5
2. Minnesota Power.....	8
3. Otter Tail Power Company.....	10
<b>B. Involuntary Disconnections (7826.1500)</b> .....	12
1. Xcel Energy.....	12
2. Minnesota Power.....	13
3. Otter Tail Power Company.....	16
<b>C. Service Extension Request Response Times (7826.1600)</b> .....	19
1. Xcel Energy.....	19
2. Minnesota Power.....	20
3. Otter Tail Power Company.....	21
<b>D. Call Center Response Times (7826.1700 and 7826.1200)</b> .....	22
1. Xcel Energy.....	22
2. Minnesota Power.....	26
3. Otter Tail Power Company.....	27
<b>E. Emergency Medical Account Status (7826.1800)</b> .....	28
1. Xcel Energy.....	29
2. Minnesota Power.....	29
3. Otter Tail Power Company.....	30
<b>F. Customer Deposits (7826.1900)</b> .....	30
1. Xcel Energy.....	30
2. Minnesota Power.....	30
3. Otter Tail Power Company.....	31
<b>G. Customer Complaints (7826.2000)</b> .....	32
1. Xcel Energy.....	32
2. Minnesota Power.....	34
3. Otter Tail Power Company.....	36
<b>IV. Staff Analysis</b> .....	38
<b>V. Decision Options (for Service Reliability and Service Quality)</b> .....	40

## I. Statement of the Issues

Should the Commission accept the portion of the utilities' annual Safety, Reliability, and Service Quality reports for 2019 related to disconnection, extension service requests, call center response times, medical account status, and customer complaints?

Should the Commission take any other action on the Annual Reports or associated matters?

## II. Introduction

Minnesota's Investor Owned Utilities (IOUs) submit Safety, Reliability, and Service Quality (SQR) Reports annually. For 2018 and 2019, Commission staff split the reports into two sections. The Safety and Reliability portion will be summarized in Volume I of briefing papers and now we focus on the Service Quality and Reporting metrics as laid out in [Minnesota Rules, Chapter 7826, Electric Utility Standards](#), with specific attention to the reporting requirements enumerated in 7826.1400 to 7826.2000.

Staff has provided a single set of decision options and recommendations for Volume One and Volume Two of the briefing papers, the decision options are replicated in both documents.

## III. Reporting Standards

Minnesota Rules 7826 requires a variety of reporting by the utilities. This set of briefing papers will address the service quality, which includes: disconnection and involuntary disconnections, extension service requests, call center response times, customers who have requested medical account status, and customer complaints.

- 7826.1400 REPORTING METER-READING PERFORMANCE.
- 7826.1500 REPORTING INVOLUNTARY DISCONNECTIONS.
- 7826.1600 REPORTING SERVICE EXTENSION REQUEST RESPONSE TIMES.
- 7826.1700 REPORTING CALL CENTER RESPONSE TIMES.
- 7826.1800 REPORTING EMERGENCY MEDICAL ACCOUNT STATUS.
- 7826.1900 REPORTING CUSTOMER DEPOSITS.
- 7826.2000 REPORTING CUSTOMER COMPLAINTS.

### A. Meter Reading Performance (7826.1400)

The annual service quality report must include a detailed report on the utility's meter-reading performance, including, for each customer class and for each calendar month:

- A. the number and percentage of customer meters read by utility personnel;
- B. the number and percentage of customer meters self-read by customers;

- C. the number and percentage of customer meters that have not been read by utility personnel for periods of six to 12 months and for periods of longer than 12 months, and an explanation as to why they have not been read; and
- D. data on monthly meter-reading staffing levels, by work center or geographical area.

1. Xcel Energy

Attachment F of Xcel’s filing include the required information. The table below found on page 1 of Attachment F provides meter reads in a calendar month and not by billing-month/read cycle.

	Residential	Commercial	Industrial	Other	A Total	B Total Number of Meters Installed	A÷B Percent Read by Utility (Company)	
<b>JANUARY</b>	1,587,348	159,378	12,311	4,166	1,763,203	1,764,624	99.92%	
<b>FEBRUARY</b>	1,448,555	144,912	11,292	3,781	1,608,540	1,766,016	91.08%	*
<b>MARCH</b>	1,589,453	159,584	12,323	4,158	1,765,518	1,767,215	99.90%	
<b>APRIL</b>	1,590,662	159,693	12,360	4,162	1,766,877	1,768,425	99.91%	
<b>MAY</b>	1,591,690	159,633	12,285	4,148	1,767,756	1,770,094	99.87%	
<b>JUNE</b>	1,519,579	155,357	12,148	4,017	1,691,101	1,771,667	95.45%	
<b>JULY</b>	1,594,653	159,931	12,362	4,150	1,771,096	1,772,936	99.90%	
<b>AUGUST</b>	1,596,083	160,035	12,276	4,139	1,772,533	1,774,303	99.90%	
<b>SEPTEMBER</b>	1,535,084	154,354	12,076	4,039	1,705,553	1,775,379	96.07%	
<b>OCTOBER</b>	1,599,156	160,475	12,323	4,134	1,776,088	1,777,636	99.91%	
<b>NOVEMBER</b>	1,443,652	142,609	10,865	3,618	1,600,744	1,779,187	89.97%	*
<b>DECEMBER</b>	1,462,144	150,488	11,940	3,874	1,628,446	1,780,813	91.44%	*

\*The number of working days in a month, the number of weekends in a month, and the number of holidays in a month will impact the percentage of meters read by the utility, particularly in February, September, November, and December when excluding multiple meter reads on a single meter from the data.

Xcel noted that “meters read percentage may be artificially low in certain months when the percentage of meters read is calculated by dividing the number of meters read in a calendar month, excluding multiple reads on a given meter, by the number of total meters” particularly in February, September, and November when there are fewer business days than the 21-day meter read cycle.<sup>1</sup>

Nearly all of the 65 self-read meters were residential in 2018, with the monthly classification found on page 1 of Attachment F.<sup>2</sup>

Xcel reported 4,074 meters were not read by the utility for periods of six to 12 months and the corresponding cause in table format and by customer class on pages

<sup>1</sup> Xcel Energy 2018 Annual Safety, Reliability and Service Quality Report at 18 (April 1, 2019).

<sup>2</sup> *Id.* at Attachment F, p 1.

2-4 of Attachment F (residential: 2,313 meters; commercial: 1,222; industrial: 489; other: 50).

Xcel reported that 1,388 meters were unread for twelve months or longer. Xcel reported these by customer class and the correlating cause, which may be found in the corrected Attachment F, pages 5 to 7. (Residential: 580; commercial: 481; industrial: 283; other: 44).

The Company also provided a separate table detailing the total number of installed meters by month and customer class. Xcel removed “deleted meters”, a designation given to meters that were incorrectly entered into the system and never truly installed at a premises.

	Residential	Commercial	Industrial	Other	Total
JANUARY	1,588,040	159,721	12,371	4,492	1,764,624
FEBRUARY	1,589,208	159,940	12,379	4,489	1,766,016
MARCH	1,590,365	159,977	12,386	4,487	1,767,215
APRIL	1,591,481	160,057	12,402	4,485	1,768,425
MAY	1,593,111	160,098	12,404	4,481	1,770,094
JUNE	1,594,580	160,191	12,417	4,479	1,771,667
JULY	1,595,730	160,312	12,417	4,477	1,772,936
AUGUST	1,596,984	160,423	12,419	4,476	1,774,302
SEPTEMBER	1,597,944	160,545	12,421	4,468	1,775,378
OCTOBER	1,599,915	160,818	12,436	4,466	1,777,635
NOVEMBER	1,601,065	161,225	12,430	4,465	1,779,185
DECEMBER	1,602,364	161,550	12,428	4,468	1,780,810

Lastly, Xcel’s staffing levels for meter reading was supplied on page 18 of their report and includes full time equivalent, no temporary staff.<sup>3</sup> The “other” column includes staff out of Fargo and Sioux Falls who read meters in western Minnesota and South Dakota.<sup>4</sup> Xcel noted their staffing levels increased by one since 2018 (1 in Metro West).<sup>5</sup>

	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18
Metro East	3	3	3	3	3	3	3	3	3	3	3	3
Metro West	2	2	2	2	3	3	3	3	3	3	3	3
Northwest	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5
Southeast	3	3	3	3	3	3	3	3	3	3	3	3
Other	1	1	1	1	1	1	1	1	1	1	1	1

<sup>3</sup> Xcel Energy 2018 Annual Safety, Reliability and Service Quality Report at 18 (April 1, 2019).

<sup>4</sup> *Id.*

<sup>5</sup> *Id.*

The Department provided historical data in their review of Xcel’s meter data after noting that “[a]n annual average of 87.26 percent of customer meters were read by utility personnel and 0.0003 percent were read by the customer in 2018.”<sup>6</sup> The Department affirmed that Xcel met the requirements of [Minn. Rules 7826.0900](#), supb. 1 in all months of 2018 where at least 90 percent of all meters must be read in the months of April to November and at least 80 percent during the months of December to March.<sup>7</sup> The following tables summarize the number of meters not read by utility personnel for six to 12 months and for 12 months or longer.<sup>8</sup>

**Table 7: Meters Not Read for 6-12 Months<sup>17</sup>**

Year	Residential	Commercial	Industrial	Other	Total
2010	3,506	1,076	338	100	5,020
2011	2,346	967	244	183	3,740
2012	3,967	1,232	248	106	5,553
2013	2,600	822	177	79	3,678
2014	5,237	1,178	260	123	6,798
2015	2,508	942	387	113	3,950
2016	2,268	772	167	75	3,282
2017	1,938	1,118	306	50	3,412
2018	2,313	1,222	489	50	4,074

**Table 8: Meters Not Read for Longer than 12 Months<sup>18</sup>**

Year	Residential	Commercial	Industrial	Other	Total
2010	1,149	366	263	71	1,849
2011	637	403	181	94	1,315
2012	661	450	112	89	1,312
2013	602	335	131	64	1,132
2014	620	304	92	68	1,084
2015	764	310	134	90	1,298
2016	551	240	109	63	963
2017	531	260	135	48	974
2018	580	481	283	44	1,388

<sup>6</sup> [Department Comments for Xcel Energy](#) at 12 (June 6, 2019).

<sup>7</sup> *Id.* at 13.

<sup>8</sup> *Id.*



## 2. Minnesota Power

Minnesota Power’s (MP) metering network is comprised of about 55% Advanced Metering Infrastructure (AMI) Solid State, 44% Automatic Meter Reading (AMR) Mechanical Hybrid, and 2% AMR Solid State. At a rate of 6-8% annually, MP will have AMI fully implemented in their service territory by the end of 2025.<sup>9</sup> The AMI has been integrated since 2011 with an Outage Management System (OMS), which provides real-time communication to service centers from the AMI system when power outages arise and when power has been restored.<sup>10</sup> MP provided a breakdown of their meter equipment infrastructure in Table 5 of Appendix A, page 14-15 of their filing. The utility also “completed implementation of its Radio Frequency AMI network communications infrastructure in 2018, selected an MDM vendor, and is in the process of selecting a system integrator to begin process implementation.”<sup>11</sup>

MP stated their personnel read, on average, for the following customer class<sup>12</sup>:

Customer Class	Percentage Read
Residential Meters	98.76%
Commercial Meters	99.9%
Industrial Meters	99.98%
Municipal Pumping Meters	100%
Lighting Meters	99.97%

Graphs were provided that depict monthly residential and commercial meter readings and estimates throughout 2018, which are found in Appendix A, pages 15-16.

Self-read meters for residential customers averaged at just 0.04% with MP receiving 95.84% of those reads.<sup>13</sup> Meanwhile, Commercial customer reads comprise .01% of their system with MP receiving 100% of those reads.<sup>14</sup> Graphs are again provided on pages 17-18 of Appendix A.

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<sup>9</sup> Minnesota Power 2018 Annual Safety, Reliability and Service Quality Report at Appendix A, p 14 (April 12, 2019).

<sup>10</sup> *Id.*

<sup>11</sup> *Id.*

<sup>12</sup> *Id.* at Appendix A, p 15.

<sup>13</sup> *Id.* at Appendix A, p 17.

<sup>14</sup> *Id.*



MP provided data regarding meters that were not read for six or more months listing twenty meters not accessible, which were all read within nine months.<sup>15</sup> Please see the table below supplied by MP and found on page 18 of Appendix A.

Months Estimated	Company Read Service Points	% of Total	Not Read Reason	Customer Read Service Points	% of Total
6 Months	6	0.004%	No Access/AMR	0	0.000%
7 Months	7	0.005%	No Access/AMR	0	0.000%
8 Months	5	0.003%	No Access/AMR	0	0.000%
9 Months	2	0.001%	No Access/AMR	0	0.000%
10 Months	0	0.000%	No Access/AMR	0	0.000%
11 Months		0.000%	No Access/AMR	0	0.000%
12 Months	0	0.000%	No Access/AMR	0	0.000%
12+Months	0	0.000%	No Access/AMR	0	0.000%
<b>Totals:</b>	<b>20</b>			<b>0</b>	

TABLE 6: METERS NOT READ 6-12 MONTHS 2018

Finally, MP noted the utility currently has seven full-time meter reading staff in its five work centers (Duluth, Cloquet, Eveleth, Long Prairie, Park Rapids) for the months of January to November.<sup>16</sup> The Eveleth work center does not have any full time staff in December.

The Department stated that MP met the standard of Minn. Rules part 7826.1400 as well as Minn. Rules, part 7826.0900, subp. 1.<sup>17</sup> The Department noted that MP reported an average of 6.9 full-time equivalent monthly meter reading staff in 2018, compared to an average of 7.5 in 2017.<sup>18</sup> Below is a table sharing historical information of unread meters.

**Table 9. Meters Not Read**

	Company Read		Customer Read	
	12 months	+12 months	12 months	+12 months
2009	1	32	0	1
2010	0	0	0	1
2011	0	3	1	3
2012	7	3	1	3
2013	2	14	0	1
2014	4	8	0	0
2015	2	5	0	0
2016	6	12	1	0
2017	0	0	0	0
2018	0	0	0	0

<sup>15</sup> The utility stated their process to help resolve unread meter issues: the utility either leaves a note on the premises or mails reminder notices that the utility needs to access the meter. Follow up phone calls are made to attempt to schedule meter readings. Disconnection notices are sent to unresponsive accounts except for Cold Weather Rule months.

<sup>16</sup> Minnesota Power 2018 Annual Safety, Reliability and Service Quality Report at Appendix A, p 19 (April 12, 2019).

<sup>17</sup> Department Comments for Minnesota Power at 19 (June 7, 2019).

<sup>18</sup> *Id.*

### 3. Otter Tail Power Company

Otter Tail provided tables summarizing their meter reading performance for each customer class on pages 37-39 of their filing. Included below is a table of Otter Tail’s system-wide totals for 2018 where an average of 97.31% of all meters were read by the utility and 1.46% were self-read.

System							
Month	Meters Read	%	Meters Estimated	%	Self Read	%	Total Meters
1	77,490	97.44%	938	1.18%	1,101	1.38%	79,529
2	77,345	97.25%	1,119	1.41%	1,069	1.34%	79,533
3	77,130	96.97%	1,333	1.68%	1,074	1.35%	79,537
4	76,922	96.63%	1,562	1.96%	1,117	1.40%	79,601
5	77,516	96.43%	1,752	2.18%	1,119	1.39%	80,387
6	77,694	95.41%	2,616	3.21%	1,124	1.38%	81,434
7	77,968	95.75%	2,327	2.86%	1,130	1.39%	81,425
8	80,213	98.40%	19	0.02%	1,285	1.58%	81,517
9	80,237	98.40%	26	0.03%	1,280	1.57%	81,543
10	79,811	98.36%	45	0.06%	1,283	1.58%	81,139
11	79,145	98.35%	52	0.06%	1,275	1.58%	80,472
12	78,650	98.37%	34	0.04%	1,273	1.59%	79,957
	<b>940,121</b>	<b>97.31%</b>	<b>11,823</b>	<b>1.22%</b>	<b>14,130</b>	<b>1.46%</b>	<b>966,074</b>

Otter Tail had two meters that were not read by an employee for a period of six to twelve months and no meters that were not read for greater than twelve months.<sup>19</sup>

As can be seen in their table below, Service Representatives Staffing levels at each customer service center were reported throughout the year with the average of 71.5 staff. In addition, Otter Tail noted they use a third party to read the Company’s meters in forty-seven cities within their Minnesota service territory.<sup>20</sup>

The Department acknowledged the utility’s fulfillment with the requirements of this rule. While looking at historical data, the Department observed that Otter Tail Power has improved their system-wide meter reading performance over the years measured.<sup>21</sup> Please see the table below furnished by the Department on page 18 of their comments.

<sup>19</sup> Otter Tail Power 2018 Annual Safety, Reliability and Service Quality Report at 39 (April 1, 2019).

<sup>20</sup> Minnesota cities include: Amiret, Argyle, Audubon, Battle Lake, Bejou, Beltrami, Bemidji, Brooks, Browns Valley, Boyd, Burr, Campbell, Canby, Clearbrook, Climax, Clitherall, Crookston, Dalton, Dent, Deer Creek, Detroit Lakes, Doran, Dumont, Eldred, Erskine, Fergus Falls, Fertile, Fisher, Frazee, Foxhome, Gently, Green Valley, Gonvick, Gully, Hallock, Henning, Kent, Lockhart, Mahnomen, Marshall (rural), McIntosh, Milroy, Minneota, Nashua, New York Mills, Oklee, Oslo, Ottertail, Pelican Rapids, Perham, Plummer, Porter, Red Lake Falls, Richville, Rothsay, Saint Hilaire, Shevlin, Solway, St. Leo, Taunton, Tenney, Tintah, Trail, Twin Valley, Ulen, Underwood, Vergas, Vining, Waubun, Wendell, Wheaton, Wilton, and Winger.

<sup>21</sup> Department Comments for Otter Tail Power Company at 19 (June 7, 2019).

	Jan 2018	Feb 2018	March 2018	April 2018	May 2018	June 2018	July 2018	Aug 2018	Sept 2018	Oct 2018	Nov 2018	Dec 2018
<b>Row Labels</b>												
<b>Bemidji</b>	<b>9</b>	<b>9</b>	<b>9</b>	<b>9</b>	<b>9</b>	<b>9</b>	<b>9</b>	<b>9</b>	<b>9</b>	<b>9</b>	<b>9</b>	<b>9</b>
Service Representative	9	9	9	9	9	9	9	9	9	9	9	9
<b>Crookston</b>	<b>14</b>	<b>14</b>	<b>9</b>	<b>13</b>	<b>14</b>	<b>9</b>	<b>9</b>	<b>9</b>	<b>9</b>	<b>14</b>	<b>9</b>	<b>14</b>
Apprentice Service Repres	3	3	1	2	3	1	1	1	1	3	1	3
Service Representative	11	11	8	11	11	8	8	8	8	11	8	11
<b>Fergus Falls</b>	<b>13</b>	<b>13</b>	<b>15</b>	<b>13</b>	<b>13</b>	<b>14</b>	<b>14</b>	<b>14</b>	<b>14</b>	<b>13</b>	<b>13</b>	<b>13</b>
Service Representative	13	13	15	13	13	14	14	14	14	13	13	13
<b>Milbank</b>	<b>16</b>	<b>16</b>	<b>13</b>	<b>14</b>	<b>14</b>	<b>14</b>	<b>14</b>	<b>14</b>	<b>15</b>	<b>16</b>	<b>16</b>	<b>16</b>
Apprentice Service Repres	3	3	1	1	1	2	2	2	3	3	3	3
Service Representative	13	13	12	13	13	12	12	12	12	13	13	13
<b>Morris</b>	<b>13</b>	<b>13</b>	<b>14</b>	<b>12</b>	<b>12</b>	<b>14</b>	<b>14</b>	<b>14</b>	<b>14</b>	<b>13</b>	<b>14</b>	<b>13</b>
Apprentice Service Repres	1	1	1			1	1	1		1	1	1
Journeyman Meter Reader	1	1	1	1	1	1	1	1	1	1	1	1
Service Representative	11	11	12	11	11	12	12	12	13	11	12	11
<b>Wahpeton</b>	<b>10</b>	<b>10</b>	<b>9</b>	<b>10</b>	<b>10</b>	<b>9</b>	<b>9</b>	<b>9</b>	<b>9</b>	<b>10</b>	<b>8</b>	<b>10</b>
Service Representative	10	10	9	10	10	9	9	9	9	10	8	10
<b>Grand Total</b>	<b>75</b>	<b>75</b>	<b>69</b>	<b>71</b>	<b>72</b>	<b>69</b>	<b>69</b>	<b>69</b>	<b>70</b>	<b>75</b>	<b>69</b>	<b>75</b>

Finally, the Department confirmed that Otter Tail Power is in compliance with Minn. Rules, part 7826.0900, subp 1. requiring utilities to read 90 percent of all meters April to November and 80 percent between December to March. The information reported reflects that 95 percent of all meters were read each month during 2018.<sup>22</sup>

	Percent Read by OTP	Percent Read by Customer	Percent Not Read
2006	92.9%	2.5%	4.6%
2007	93.4%	2.8%	3.9%
2008	93.8%	2.7%	3.5%
2009	94.1%	2.4%	3.5%
2010	94.4%	2.6%	3.0%
2011	95.1%	2.6%	2.3%
2012	95.9%	2.1%	2.0%
2013	95.8%	1.9%	2.3%
2014	95.9%	1.8%	2.4%
2015	95.9%	1.7%	2.4%
2016	96.4%	1.5%	2.2%
2017	96.4%	1.5%	2.2%
2018	97.3%	1.5%	1.2%

<sup>22</sup> Department Comments for Otter Tail Power Company at 19 (June 7, 2019).

## B. Involuntary Disconnections (7826.1500)

The annual service quality report must include a detailed report on involuntary disconnections of service, including, for each customer class and each calendar month:

- A. the number of customers who received disconnection notices;
- B. the number of customers who sought cold weather rule protection under Minnesota Statutes, sections 216B.096 and 216B.097, and the number who were granted cold weather rule protection;
- C. the total number of customers whose service was disconnected involuntarily and the number of these customers restored to service within 24 hours; and
- D. the number of disconnected customers restored to service by entering into a payment plan.

### 1. Xcel Energy

In Attachment G, Xcel reported data in table format that included the required metrics: customer disconnections, customers who sought cold weather rule protection and utility granting of protection, customer restoration to power within 24 hours, customer restoration to power with a payment plan, and medical account requests with the Company's correlating denials.

The Company noted that disconnection data is comprehensive of gas *and* electric customers as approximately 94% of Xcel's Minnesota customers are electric or combined gas and electric customers.<sup>23</sup> For customers who receive gas and electric service, a disconnect would be due to the total amount of regulated charges overdue.<sup>24</sup> The Company's customer service system does not have the functionality to sort the data or track disconnects due to electric non-payment.<sup>25</sup>

Another note made by Xcel concerning the requirement under [Minn. R. 7820.2400](#) that the utility send duplicate notices to multiple addresses for each disconnected customer impacts their reported numbers.<sup>26</sup> Therefore, numbers reflected do include duplicates and does not separately count unique customer circumstances.<sup>27</sup>

Based on the information reported, in 2018, there were:

- 703,667 disconnection notices sent to customers – 144,656 commercial and 559,011 residential;
- 115,472 residential customers seeking cold weather rule protection and all were granted;

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<sup>23</sup> Specifically, Minn. R. 7820.2400: Notice shall be sent to the address where service is rendered **and** to the address where the bill is sent if different from the address where service is rendered.

<sup>24</sup> Xcel Energy 2018 Annual Safety, Reliability and Service Quality Report at Attachment G, p 72 (April 1, 2019).

<sup>25</sup> *Id.*

<sup>26</sup> *Id.*

<sup>27</sup> *Id.*



- 17,917 customers locked for nonpayment – 580 commercial and 17,337 residential.
- 6,678 customers restored to service within 24 hours – 74 commercial and 6,586 residential;
- 1,254 customers restored to service after a condition of payment – commercial 3 and residential 1,506;

The Department acknowledged Xcel’s fulfillment of the requirements of the rule and provided a table comparing historical residential involuntary disconnection and cold weather rule data.<sup>28</sup>

**Table 9: Residential Customer Involuntary Disconnection Information<sup>19</sup>**

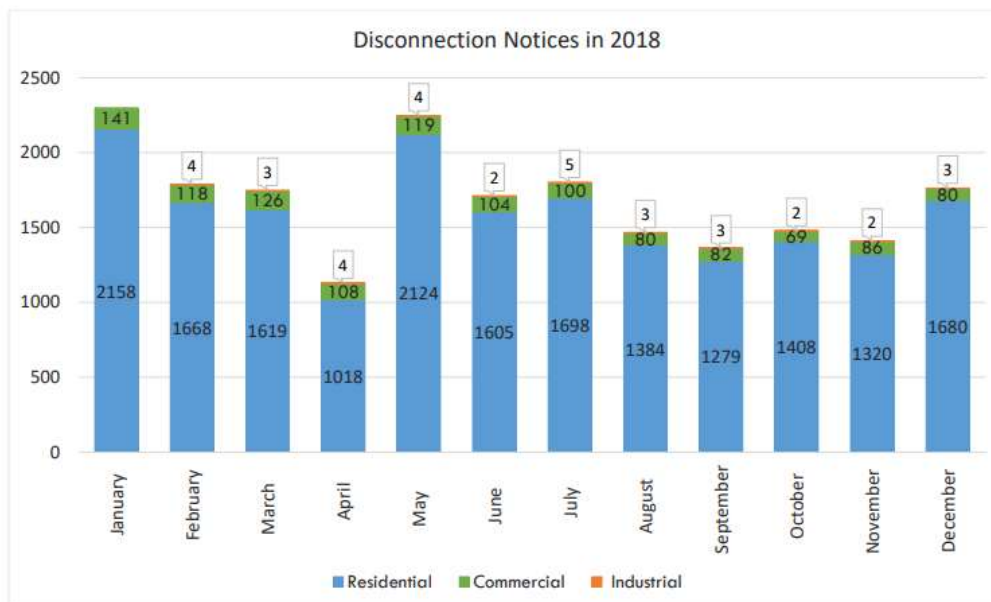
Year	Customers Receiving Disconnect Notice	Customers Seeking CWR Protection	Customers Granted CWR Protection	% Granted	Customers Disconnected Involuntarily	Customers Restored within 24 Hours	Customers Restored by Entering Payment Plan
2008	1,175,953	86,092	86,092	100%	28,863	11,449	727
2009	1,186,057	140,862	140,862	100%	29,612	11,214	1,253
2010	1,218,073	173,440	173,440	100%	29,592	12,121	1,265
2011	1,282,576	188,091	188,271	100%	27,120	11,273	1,446
2012	1,207,842	279,713	279,713	100%	27,132	11,010	1,047
2013	1,217,049	126,477	126,477	100%	23,493	9,221	882
2014	1,166,978	105,561	105,561	100%	25,532	10,283	1,250
2015	1,042,775	151,956	151,956	100%	26,756	11,556	1,201
2016	870,665	130,052	130,052	100%	20,574	7,698	1,512
2017	747,409	140,943	140,943	100%	19,212	6,564	1,251
2018	559,011	115,472	115,472	100%	17,337	6,586	1,506

## 2. Minnesota Power

As summarized in Table 8 of MP’s report, there were 20,209 disconnection notices in 2018 spread across residential, commercial, and industrial classes with the highest months in January and May.<sup>29</sup>

<sup>28</sup> Department Comments for Xcel Energy at 23 (June 7, 2019).

<sup>29</sup> Minnesota Power 2018 Annual Safety, Reliability and Service Quality Report at Appendix A, p 20 (April 12, 2019).



Total Disconnection Notices in 2018		
Residential	Commercial	Industrial
18,961	1,213	35

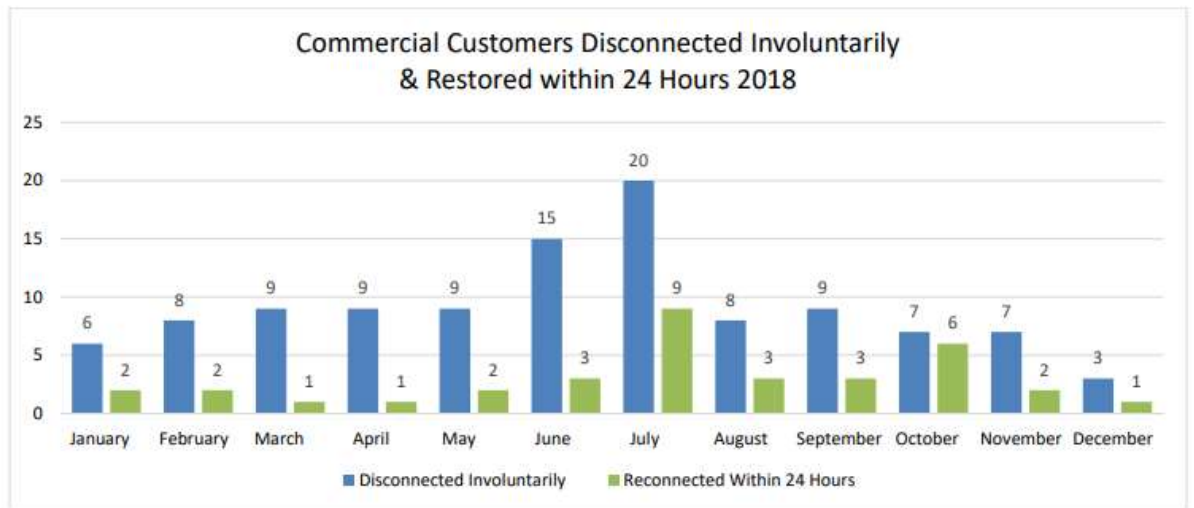
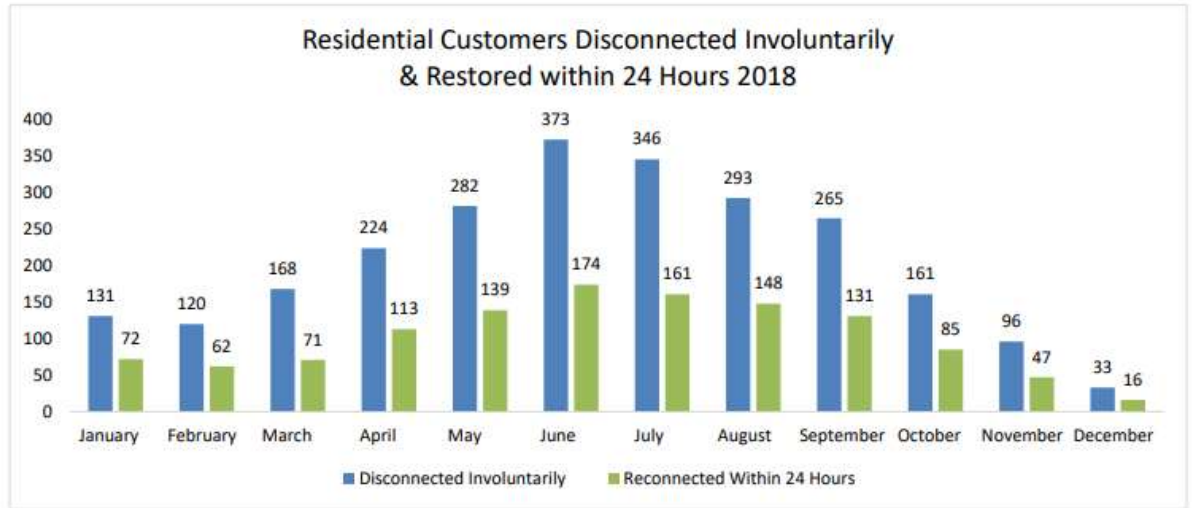
TABLE 8: DISCONNECTION NOTICES IN 2018

All customers seeking Cold Weather Rule protection in 2018 – 4,311 – were granted.<sup>30</sup> The monthly breakdown is available in MP’s Table 9 on page 21 of Appendix A. MP stated that with the exception of income verification, they adhere to the governing statute ([Minnesota Statute § 216B.096, subd. 5](#)) and work with customers to acceptable payment amounts that fit within the customer’s constraints.<sup>31</sup>

MP’s involuntary disconnection and power restoration totals for 2018 are below – 2,602 involuntary disconnections and nearly half (48%, 1,254 were restored within 24 hours.

<sup>30</sup> Minnesota Power 2018 Annual Safety, Reliability and Service Quality Report at Appendix A, p 21 (April 12, 2019).

<sup>31</sup> *Id.*



Total Customer Disconnected Involuntarily			Total Customers Restored within 24 Hours		
Residential	Commercial	Industrial	Residential	Commercial	Industrial
2,492	110	4	1,219	35	0

TABLE 10: CUSTOMERS DISCONNECTED INVOLUNTARILY AND RESTORED W/IN 24 HOURS

It was reported that 1,644 customer accounts were restored to service by entering into a payment plan as shown in Figure 6 of MP's filing from page 23 of Appendix A.



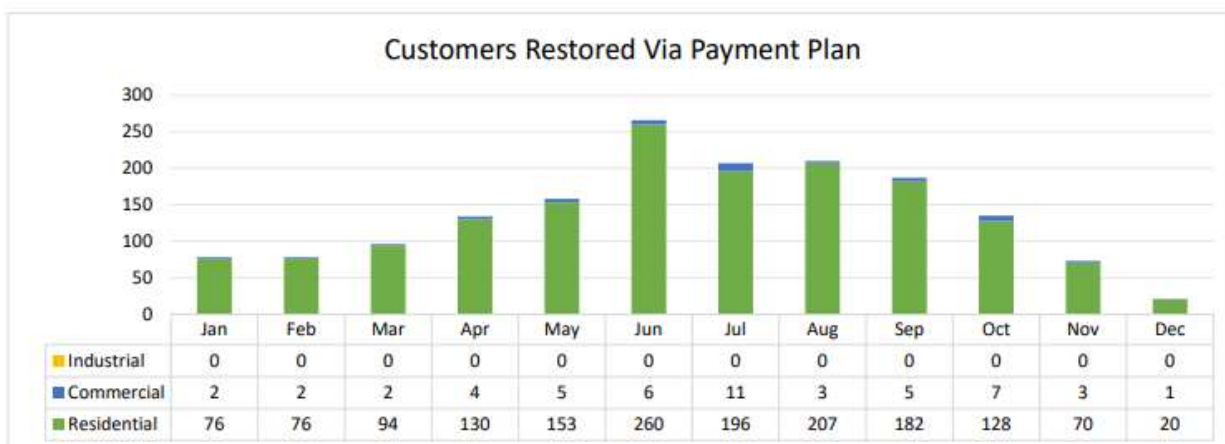


FIGURE 6: CUSTOMERS RESTORED VIA PAYMENT PLAN 2018

The Department acknowledged MP’s fulfillment of the rule and provided a table summarizing historical data on involuntary disconnections, CWR, and payment plan reconnections since 2009.<sup>32</sup>

**Table 10. Residential Customer Involuntary Disconnection Information**

	Received Disconnect Notice	Sought CWR Protection	% Granted	Disconnected Involuntarily	Restored within 24 Hours	Restored by Entering Payment Plan
2009	33,129	1,429	100%	3,229	1,723	311
2010	35,526	1,698	100%	2,853	1,481	297
2011	37,647	3,465	99%	3,009	1,804	331
2012	37,837	3,227	99.8%	3,518	1,828	569
2013	40,451	2,617	99.8%	3,171	1,122	576
2014	35,796	2,852	100%	3,257	799	443
2015	22,537	2,173	100%	520	154	56
2016	12,191	2,916	100%	1,933	213	634
2017	17,454	3,475	100%	2,668	1,284	1,680
2018	18,961	4,311	100%	2,492	1,219	1,592

### 3. Otter Tail Power Company

Involuntary disconnection notices sent among all customer classes in 2018 totaled 56,808 about a 5.7% increase from 2017.<sup>33</sup> Otter Tail supplied a table breaking down this information by customer class and month within their reply comments on page 2, below.

<sup>32</sup> Department Comments for Minnesota Power at 20 (June 7, 2019).

<sup>33</sup> Otter Tail Power Reply Comments at 2 (June 28, 2019).

**Table 19 - Corrected**

<b>Month</b>	<b>Large Commercial</b>	<b>Residential</b>	<b>Small Commercial</b>	<b>Grand Total</b>
January	17	3855	280	4423
February	18	4352	330	4700
March	18	4781	397	5196
April	15	4045	329	4389
May	21	4621	366	5008
June	14	3665	306	5364
July	19	4148	319	4486
August	25	6183	447	6655
September	18	3516	221	3755
October	24	5160	335	5519
November	16	3500	289	3805
December	29	4775	354	5158
<b>Grand Total</b>	<b>234</b>	<b>52601</b>	<b>3973</b>	<b>56808</b>

Otter Tail Power reported that 659 customers sought cold weather rule protection and all but two were granted. The Company provided monthly data on page 42 of their filing.

<b>Month</b>	<b>Customers who sought Cold Weather Rule Protection in 2018</b>	<b>Number Granted Cold Weather Protection in 2018</b>
January	96	96
February	91	90
March	91	91
April	36	36
May	0	0
June	0	0
July	0	0
August	0	0
September	0	0
October	146	145
November	119	119
December	80	80

The number of customers whose service was restored in less than 24 hours or disconnected for more than 24 hours from an involuntary disconnection is supplied in a table on page 43 of their filing showing 660 residential and small commercial customers were disconnected for more than 24 hours and 428 customers reconnected within 24 hours.

Finally, 32 customers were restored to service by entering into a payment plan with the utility, with the months of March and April having the most agreements.<sup>34</sup> Please see the table below from Otter Tail’s filing.

Month	Residential	Small Commercial	Large Commercial	Total
January	1	0	0	1
February	2	0	0	2
March	5	0	0	5
April	11	0	0	11
May	0	0	0	0
June	2	0	0	2
July	1	0	0	1
August	2	0	0	2
September	3	0	0	3
October	2	0	0	2
November	2	0	0	2
December	1	0	0	1
<b>Totals</b>	<b>32</b>	<b>0</b>	<b>0</b>	<b>32</b>

The utility initially reported a higher number of disconnection notices as Otter Tail did not remove South Dakota customers from their data set. Other than asking Otter Tail to provide more details on the apparent increase in disconnections, the Department acknowledged Otter Tail’s fulfillment of the requirements of this rule.<sup>35</sup>

**Table 13: Residential Customer Involuntary Disconnection Information**

	Received Disconnect Notice	Sought CWR Protection	Granted CWR Protection	% Granted	Disconnected Involuntarily	Restored within 24 Hours	Restored by Entering Payment Plan
2005	33,274	302	260	86%	1,008	351	22
2006	37,980	388	291	75%	873	295	54
2007	39,022	671	573	85%	1,293	416	61
2008	41,764	1,062	970	91%	973	289	28
2009	36,976	1,139	1,139	100%	1,069	432	40
2010	38,119	1,837	1,837	100%	1,122	428	44
2011	38,723	2,118	2,118	100%	1,168	506	38
2012	39,912	2,139	2,137	99.9%	745	558	29
2013	39,913	1,788	1,776	99.3%	745	644	23
2014	44,894	1,430	1,424	99.6%	794	619	104
2015	49,185	1,130	1,125	99.6%	629	232	69
2016	49,368	932	928	99.6%	924	301	42
2017	48,421	817	814	99.6%	1,044	415	33
2018	<del>67,015</del>	659	658	99.9%	1,088	428	32

52,601

<sup>34</sup> The months of March and April precedes the end of Cold Weather Rule protection. The Commission may wish to discuss this in more detail at the agenda meeting or direct Otter Tail Power to discuss this with staff.

<sup>35</sup> Department Comments for Otter Tail Power Company at 20 (June 7, 2019).

Note: Staff correction with information supplied by Otter Tail Power in reply comments.

### C. Service Extension Request Response Times (7826.1600)

Under this rule, utilities are required to report on service extension request response times, including, for each customer class and each calendar month:

- A. The number of customers requesting service to a location not previously served by the utility and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service.
- B. The number of customers requesting service to a location previously served by the utility, but not served at the time of the request, and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service

#### 1. Xcel Energy

As indicated in Attachment H and the table below, there were 3,630 service installations requested among commercial and residential customers at locations not previously served in 2018, with the average in-service date being 7.33 days for residential and 4.6 days for commercial.<sup>36</sup> The Company noted this years' service extension data is more reflective of customer experience and uses concrete data points from their new SAP work management system. Given this improved view, the Company has "an initiative to improve performance and decrease the turnaround times for the provision of residential service where construction is required."<sup>37</sup>

Xcel Energy  
Electric Service Extension Request Response Times - 2018  
Minn. R. 7826.1600

Docket No. E002/M-19-\_\_\_\_  
Attachment H  
Page 1 of 1

<b>Residential</b>													
	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total 2018
# Service Installations	114	115	291	296	293	247	237	302	211	474	327	100	3007
Avg days to complete from customer and site ready	10.2	12.6	7.1	7.5	5.3	7.3	6.3	6.7	8.1	4.9	5.5	6.5	7.33
<b>Commercial</b>													
	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total 2018
# Service Installations	42	48	22	29	65	50	63	55	35	77	66	69	623
Avg days to complete from customer and site ready	4.5	6.4	7.2	3.7	3.1	3.5	4.0	4.5	4.8	3.6	6.7	4.7	4.60

Additionally, Xcel stated that 306,559 customers requested service at a location previously served by the Company in 2018.<sup>38</sup> Xcel is able to handle these requests on the next business day as it generally involves setting a meter and connecting the

<sup>36</sup> Xcel Energy 2018 Annual Safety, Reliability and Service Quality Report at Attachment G, p 74 (April 1, 2019).

<sup>37</sup> *Id.* at 19-20.

<sup>38</sup> *Id.* at 20.

service. Such instances have not been reflected in the information provided in Attachment H.<sup>39</sup>

The Department acknowledged Xcel's fulfillment of the requirements of this rule and stated that although the data resulting from the new SAP management tool may not be comparable to historical service extension fulfillments, the "response times for residential and commercial customers in 2018 were relatively consistent with data provided for years 2009-2017."<sup>40</sup>

## 2. Minnesota Power

In 2018, MP reported 2,130 service extension requests to locations not previously served with a majority being on schedule and about 15% (325) documented as 10+ days beyond the in-service date.<sup>41</sup> Four industrial service requests were also reported and all except one was completed on time.<sup>42</sup> Please see Figures 7 and 8 on pages 24-25 of Appendix A for more details.

MP explained the most significant reasons for a delay in meeting in-service dates in 2018 were: MP delay due to workload (46.35%), customer not ready (18.59%), and the job redesigned (8.23%).<sup>43</sup>

For service extensions at previously served locations, but not served at the time of the request, MP provided four charts found on pages 26-28 of Appendix A. MP reported 892 commercial, 3,644 residential, 8 industrial, and 26 municipal service extension requests to previously served locations throughout 2018. Of all these requests, most met the in-service date or within 10 days, and 25 requests were beyond 10+ days of the in-service date. For these requests, the utility reported the top three reasons for delay: dates not updated for project (44.88%), Minnesota Power delay due to workload (34.16%), and work done date incorrect (7.76%).

The Department acknowledged Minnesota Power's fulfillment of the rule. It found that since 2017, MP had a 21% increase in requests for not previously served locations, while "new installations were significantly higher than the average of 1,080 for the 8-year period between 2010 and 2017."<sup>44</sup> Nearly 65% were connected by the date requested.<sup>45</sup> For locations that previously had service, MP reported numbers close to 2017 with about 87% meeting the request date.<sup>46</sup>

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<sup>39</sup> Xcel Energy 2017 Annual Safety, Reliability and Service Quality Report at 20 (April 1, 2019).

<sup>40</sup> [Department Comments for Xcel Energy](#) at 15 (June 7, 2019).

<sup>41</sup> Minnesota Power 2018 Annual Safety, Reliability and Service Quality Report at Appendix A, p 24-25 (April 12, 2019). Service extensions came from 960 commercial accounts and 1154 residential accounts.

<sup>42</sup> *Id.* at Appendix A, p 25.

Staff notes that eight additional industrial service extensions were found during communication with MP for a total of 12 service extensions for the industrial customer class. All but one was completed on time.

<sup>43</sup> *Id.*

<sup>44</sup> Department Comments for Minnesota Power at 21 (June 7, 2019).

<sup>45</sup> *Id.*

<sup>46</sup> *Id.* at 22.



**Table 11. New Service Extension Requests: Combined Residential, Commercial, and Industrial**

	Total Number of Installations	Request Date Met	% Request Date Met
2010	712	484	68.0%
2011	603	420	69.7%
2012	653	476	72.9%
2013	794	614	77.3%
2014	857	618	72.1%
2015	1,800	1,070	59.4%
2016	1,476	835	56.6%
2017	1,747	1,338	76.6%
2018	2,118	1,374	64.9%

**Table 12. Previously Served Customer Service Extension Requests: Combined Residential, Commercial, and Industrial**

	Total Number of Installations	Request Date Met	% Request Date Met
2010	2,329	2,057	88.3%
2011	2,453	2,198	89.6%
2012	2,526	2,389	94.6%
2013	2,305	2,097	91.0%
2014	2,375	2,216	93.3%
2015	1,671	1,396	83.5%
2016	2,652	2,463	92.9%
2017	4,563	4,032	88.4%
2018	4,544	3,940	86.7%

### 3. Otter Tail Power Company

There were 2,396 customers – divided among residential, small commercial, and large commercial customer classes, but predominately residential and small commercial – requesting service extensions listed in Table 23 of their filing on pages 45-46. This same table also includes data regarding the number of customers requesting service to a location previously served by the utility.

The Department acknowledged that Otter Tail Power fulfilled the requirements of this rule. It noted that “357 [residential] customers requested service to a location not previously served, all of which were connected on time,” while there were 1,649 [residential] requests to locations previously served with 15 connected late.<sup>47</sup> The Department determined that “response times for 2018 appear to be relatively consistent with past years.”<sup>48</sup>

<sup>47</sup> Department Comments for Otter Tail Power Company at 20 (June 7, 2019).

<sup>48</sup> *Id.*

## **D. Call Center Response Times (7826.1700 and 7826.1200)**

On an annual basis, utilities shall answer 80% of calls made to the business office during regular business hours within 20 seconds. "Answer" means that an operator or representative is ready to render assistance or accept the information to handle the call. Acknowledging that the customer is waiting on the line and will be served in turn is not an answer. If the utility uses an automated call-processing system, the 20-second period begins when the customer has selected a menu option to speak to a live operator or representative. Utilities using automatic call-processing systems must provide that option, and they must not delay connecting the caller to a live operator or representative for purposes of playing promotional announcements.

On an annual basis, utilities shall answer 80% of calls directed to the telephone number for reporting service interruptions within 20 seconds. "Answer" may mean connecting the caller to a recording providing, to the extent practicable, at least the following information:

- A. the number of customers affected by the interruption;
- B. the cause of the interruption;
- C. the location of the interruption; and
- D. the utility's best estimate of when service will be restored, by geographical area.

### 1. Xcel Energy

Xcel provides this information in table format within Attachment I with descriptive details in the filing from pages 20-21.

The Company included credit calls with their call center response times pursuant to the Commission's November 3, 2004 Order in Docket No. E002/M-04-511.<sup>49</sup> In Attachment I, Xcel provided a comparison of all service level calls, which includes calls offered to agents (Residential, Business Solutions Center Calls (BSC), and Personal Account Representatives (PAR)) and all IVR (Interactive Voice Response) handled calls.<sup>50</sup>

Xcel noted their centers are staffed 24 hours a day, 7 days a week, with their IVR used in the same manner across this time period, therefore those are their "business hours" and how performance is reported.<sup>51</sup> Xcel highlighted that of all their *outage* calls, 81% were answered in 20 seconds or less (Line 27) and of *all* calls received, 91.1% were answered in 20 seconds or less (Line 26).<sup>52</sup> The Company also highlighted their average speed of answer (ASA) on Line 31 and the following lines break down the ASA by call center.<sup>53</sup>

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<sup>49</sup> Xcel Energy 2018 Annual Safety, Reliability and Service Quality Report at 20 (April 1, 2019).

<sup>50</sup> *Id.* at 19.

<sup>51</sup> *Id.* at 20.

<sup>52</sup> *Id.*

<sup>53</sup> *Id.*



Pursuant to the Commission’s [November 2, 2017 Order in Docket No. E002/M-17-553](#), Xcel provided an update regarding changes to their non-emergency call center hours that became effective January 1, 2018 and are Monday through Friday, 7:00 a.m. to 7:00 p.m. and Saturdays from 9:00 a.m. to 5:00 p.m.<sup>54</sup> The Company reported they “have not encountered any technical or other issues” given this change, but have received four complaints/comments that have been satisfactorily resolved.<sup>55</sup>

The company provided a summary of their call volume<sup>56</sup>:

Overall incoming call volume was down nearly 40,000 calls year over year. The agent call volume was down 147,000 calls, while the calls handled by the automated system increased by 108,000. In addition, we saw an increase of 18.9 percent in customer Ebill enrollments and 10.7 percent in My Account enrollments from 2017 to 2018.

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<sup>54</sup> Xcel Energy 2018 Annual Safety, Reliability and Service Quality Report at 21 (April 1, 2019).

<sup>55</sup> *Id.*

Additionally, Xcel’s emergency and outage call center representatives remain available 24/7.

<sup>56</sup> *Id.*

Xcel Energy  
 Service Quality Report 2018  
 Minn. R. 7826.1700 - Call Center Response Time  
 Minnesota Service Level

Docket No. E002/M-19-\_\_\_\_  
 Attachment I  
 Page 1 of 2

	January	February	March	April	May	June	July	August	September	October	November	December	2018
1 All Residential Calls offered to Agents	72,064	61,260	71,621	77,502	96,240	96,749	99,033	101,568	90,333	95,451	73,645	62,142	997,608
2 All BSC Calls Offered to Agents	5,570	4,510	4,914	4,768	5,258	4,999	5,011	5,199	4,928	5,334	4,654	3,909	59,054
3 All Credit Calls Offered to Agents	13,325	13,279	18,282	30,679	18,571	14,508	12,295	17,765	18,446	18,621	13,921	14,038	203,730
4 All PAR Calls Offered to Agents	2,999	2,860	3,640	6,043	6,310	4,937	4,617	5,784	4,910	4,481	3,128	2,266	51,975
5 All Calls Offered to Agents	93,958	81,909	98,457	118,992	126,379	121,193	120,956	130,316	118,617	123,887	95,348	82,355	1,312,367
6 All Calls Excluding Credit and PAR	90,959	79,049	94,817	112,949	120,069	116,256	116,339	124,532	113,707	119,406	92,220	80,089	1,260,392
7 All Residential Calls Answered by Agents within 20 seconds	55,878	47,230	55,471	57,591	72,232	65,104	62,060	61,009	80,167	84,146	67,211	49,010	757,109
8 All BSC Calls Answered by Agents within 20 seconds	4,155	3,691	4,109	3,934	3,608	3,477	3,123	3,617	3,375	3,766	3,540	2,952	43,347
9 All Credit Calls Answered by Agents within 20 seconds	11,781	11,470	15,482	22,992	15,973	11,382	9,042	14,100	17,519	17,493	13,018	11,875	172,127
10 All PAR Calls Answered by Agents within 20 seconds	2,492	2,328	2,914	4,493	4,729	3,913	3,618	4,222	3,563	3,538	2,675	1,962	40,447
11 All Calls Answered by Agents within 20 seconds	74,306	64,719	77,976	89,010	96,542	83,876	77,843	82,948	104,624	108,943	86,444	65,799	1,013,030
12 All Calls Answered by Agents within 20 seconds Excluding Credit and PAR	71,814	62,391	75,062	84,517	91,813	79,963	74,225	78,726	101,061	105,405	83,769	63,837	972,583
13 Non-Billing and Non-Outage Calls Completed in IVR	21,935	24,415	27,582	30,428	29,151	27,173	29,178	32,924	28,025	27,734	25,550	25,899	329,994
14 Billing Calls Handled by IVR	120,940	116,778	130,950	128,219	122,147	124,258	126,223	133,470	120,440	121,244	110,718	111,281	1,466,668
15 Outage Calls Handled by IVR	13,110	8,229	19,187	14,896	32,663	34,116	39,213	28,367	32,124	21,048	10,449	9,603	263,005
16 Outage Calls Offered to Agents	11,219	7,728	11,893	11,784	19,894	20,724	20,843	17,209	17,257	14,886	9,593	8,604	171,634
17 Total Outage Calls	24,329	15,957	31,080	26,680	52,557	54,840	60,056	45,576	49,381	35,934	20,042	18,207	434,639
18 All Calls Offered to Agents + Outage Calls Handled by IVR	107,068	90,138	117,644	133,888	159,042	155,309	160,169	158,683	150,741	144,935	105,797	91,958	1,575,372
19 All Calls Answered by Agents within 20 seconds + Outage Calls Handled by IVR	87,416	72,948	97,163	103,906	129,205	117,992	117,056	111,315	136,748	129,991	96,893	75,402	1,276,035
20 Res and BSC Calls Offered to Agents + Outage Calls Handled by IVR	104,069	87,278	114,004	127,845	152,732	150,372	155,552	152,899	145,831	140,454	102,669	89,692	1,523,397
21 Res and BSC Calls Answered by Agents within 20 seconds + Outage Calls Handled by IVR	84,924	70,620	94,249	99,413	124,476	114,079	113,438	107,093	133,185	126,453	94,218	73,440	1,235,588
22 All Calls Offered to Agents + Outage Calls Handled by IVR + Billing Calls Handled by IVR	228,008	206,916	248,594	262,107	281,189	279,567	286,392	292,153	271,181	266,179	216,515	203,239	3,042,040
23 All Calls Answered by Agents within 20 seconds + Outage Calls Handled by IVR + Billing Calls Handled by IVR	208,356	189,726	228,113	232,125	251,352	242,250	243,279	244,785	257,188	251,235	207,611	186,683	2,742,703

Xcel Energy  
 Service Quality Report 2018  
 Minn. R. 7826.1700 - Call Center Response Time  
 Minnesota Service Level

Docket No. E002/M-19-\_\_\_\_  
 Attachment I  
 Page 2 of 2

	January	February	March	April	May	June	July	August	September	October	November	December	2018
24	Res and BSC Calls Offered to Agents + Outage Calls Handled by IVR + Billing Calls Handled by IVR												
	225,009	204,056	244,954	256,064	274,879	274,630	281,775	286,369	266,271	261,698	213,387	200,973	2,990,065
25	Res and BSC Calls Answered by Agents within 20 seconds + Outage Calls Handled by IVR + Billing Calls Handled by IVR												
	205,864	187,398	225,199	227,632	246,623	238,337	239,661	240,563	253,625	247,697	204,936	184,721	2,702,256
26	Service Level All Calls (Residential, BSC, Credit and PAR and all calls handled by IVR)												
	92.1%	92.6%	92.6%	89.8%	90.4%	87.8%	86.3%	85.4%	95.3%	94.9%	96.3%	92.8%	91.1%
27	Service Level All Calls (Residential, BSC, Credit and PAR) and IVR Handled Outage Calls												
	81.6%	80.9%	82.6%	77.6%	81.2%	76.0%	73.1%	70.1%	90.7%	89.7%	91.6%	82.0%	81.0%
28	Service Level Res and BSC Calls, excluding Credit and calls (including outage and billing calls handled by IVR)												
	91.5%	91.8%	91.9%	88.9%	89.7%	86.8%	85.1%	84.0%	95.3%	94.6%	96.0%	91.9%	90.4%
29	Service Level Res and BSC Calls, excluding credit calls (not including billing calls handled by IVR)												
	81.6%	80.9%	82.7%	77.8%	81.5%	75.9%	72.9%	70.0%	91.3%	90.0%	91.8%	81.9%	81.1%
30	Service Level (agent only)												
	79.1%	79.0%	79.2%	74.8%	76.4%	69.2%	64.4%	63.7%	88.2%	87.9%	90.7%	79.9%	77.2%
31	Average Speed of Answer - ASA (Agent only Residential, BSC, Credit and PAR)												
	18	19	21	38	23	25	31	31	13	14	9	16	22
	ASA Residential												
	20	22	24	28	24	26	32	34	11	14	8	17	22
	ASA BSC												
	26	18	16	17	38	36	51	41	40	38	25	29	31
	ASA Credit												
	9	9	10	67	12	14	16	14	5	4	5	10	18
	ASA PAR												
	15	18	22	34	30	25	25	38	40	26	14	15	27

Notes:

13	IVR handled calls are answered immediately with an average speed to answer calls calculated using 0 seconds and includes non-billing and non-outage IVR calls that did not route to an agent. These calls may have been offered messaging that can answer many upfront questions, including but not limited to billing credits, scam information, call before you dig information, the hold time length, or will direct the caller to other resources.												
26	The service level formula is: (All Calls Answered by Agents within 20 seconds + All IVR Handled calls) / (All Calls Offered to Agents + All IVR Handled Calls)												
27	The service level formula is: (All Calls Answered by Agents within 20 seconds + Outage Calls Handled by IVR) / (All Calls Offered to Agents + Outage Calls Handled by IVR)												
	Agent call volumes includes calls offered and handled at the Residential call centers (Amarillo, Centre Pointe and Sky Park), at the Business call center at Sky Park and Denver, at the Credit call centers at Amarillo, Centre Pointe and Sky Park.												
	Data on calls to agents is gathered from the phone switch (Avaya) based on skills.												
	Data on IVR calls is gathered from the IVR reporting tool (Voice Portal).												



The Department calculated that in 2018, “an average of 90.16 percent of calls to the Company were answered within 20 seconds” and calls handled by Xcel’s Agents had an average of 77.17 percent answered within 20 seconds.”<sup>57</sup>

The Department acknowledged that Xcel has fulfilled the requirements of both rules and complied with the ordering paragraph 1 in the Commission’s November 2, 2017 Order in Docket No. E002/M-17-553.<sup>58</sup> It was also noted that the changes in call center hours has not appeared to have a negative impact to Xcel’s customer service.<sup>59</sup>

## 2. Minnesota Power

MP does not have a line dedicated to service interruptions. Instead, all calls, no matter the subject matter, are routed through the Company’s Interactive Voice Response (IVR) unit where customers select from a menu of options with the first option to report an outage.<sup>60</sup> Calls related to service interruptions are handled immediately through MP’s automated trouble-order system while other calls are managed manually by call center representatives.<sup>61</sup> MP uses IVR data to report their service interruption calls, but cannot provide response times on an individual contact type as the IVR is unable to track those.<sup>62</sup> Call center representatives track calls by type of contact. Given this, MP stated that their “response time percentage is shown as an aggregate of all calls received through the IVR and the Call Center, and the calls are not broken out by type of call because Minnesota Power is currently unable to separate response time by contact type.”<sup>63</sup> With 82% of calls

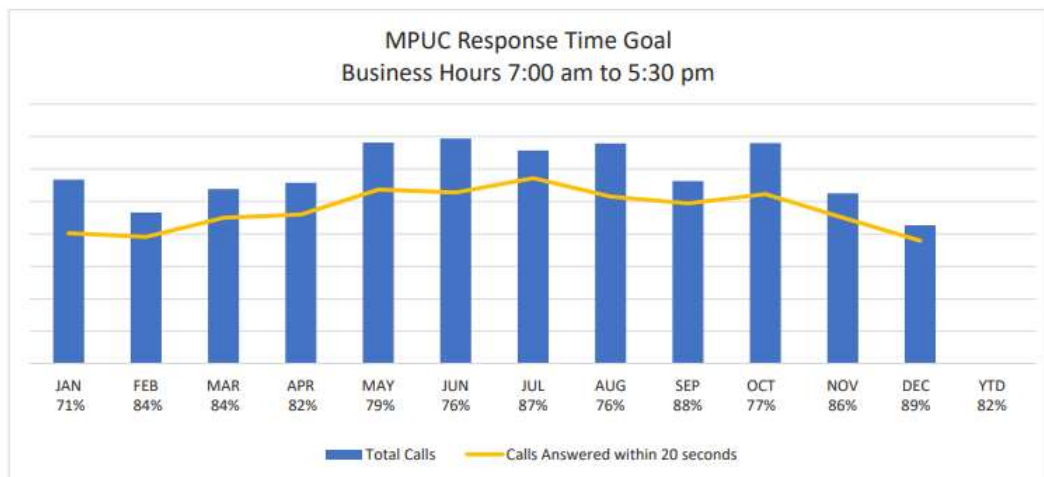


FIGURE 15: RESPONSE TIME – BUSINESS HOURS 2018

<sup>57</sup> Department Comments for Xcel Energy at 15-16 (June 7, 2019).

<sup>58</sup> *Id.* at 16.

<sup>59</sup> *Id.*

<sup>60</sup> Minnesota Power 2018 Annual Safety, Reliability and Service Quality Report at Appendix A, p 31. (April 12, 2019).

<sup>61</sup> *Id.*

<sup>62</sup> *Id.*

<sup>63</sup> *Id.* at Appendix A, p 90.

being answered within 20 seconds, MP exceeded the established goal as depicted in Figures 15 on page 32 of Appendix A.

MP also noted the diversity of avenues to communicate with customers (IVR, email, online account platforms, etc.) and the importance of measuring and assessing all effective efforts. These may impact Call Center response times. “As more self-service options become available to customers, the types of calls that the Call Center receives will likely become predominantly more complex and time-consuming.”<sup>64</sup> As MP stated, this was discussed in last year’s SRSQ filing and in other dockets.

The Department inquired for more detailed information concerning the specific number of calls received and calls answered within 20 seconds, both for business and non-business hours and by call category, as required in the service quality rules.<sup>65</sup> The Department also asked whether MP had a solution for changing communication channels and how best to measure success moving forward.

In response, the Company shared a monthly breakdown of 140,700 calls received during business hours (7:00 am to 5:30 pm) and 14,615 calls after business hours (5:30 pm to 7:00 am) to the Company’s IVR unit.<sup>66</sup> The top three call categories were found to be billing inquiries, starting or stopping service, and phone transfer.<sup>67</sup>

Finally, regarding future customer communication assessments and service quality metrics, MP suggested that “customer expectations and preferences regarding communication channels will ultimately need to be a point of consideration and review as part of service quality reporting ... the Call Center has been and will continue to be an important channel for customers, but it is becoming one of several.”<sup>68</sup> “As this situation is not unique to Minnesota Power, the input of other utilities and stakeholders is required for a formal update to the [service quality] metrics.”<sup>69</sup> The Department agreed that Minnesota Rules does not account for emerging communication channels and that “developing customer service metrics associated with new forms of self-service communication will grow in importance as the use of new forms of communication grows.”<sup>70</sup>

The Department acknowledged Minnesota Power’s fulfillment of both rules.

### 3. Otter Tail Power Company

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<sup>64</sup> Minnesota Power 2018 Annual Safety, Reliability and Service Quality Report, Appendix A at 31 (April 12, 2019).

<sup>65</sup> Department Comments for Minnesota Power at 22 (June 7, 2019).

<sup>66</sup> Minnesota Power Reply Comments at 7-8 (July 8, 2019).

<sup>67</sup> *Id.* at 9.

<sup>68</sup> *Id.*

<sup>69</sup> *Id.* at 10.

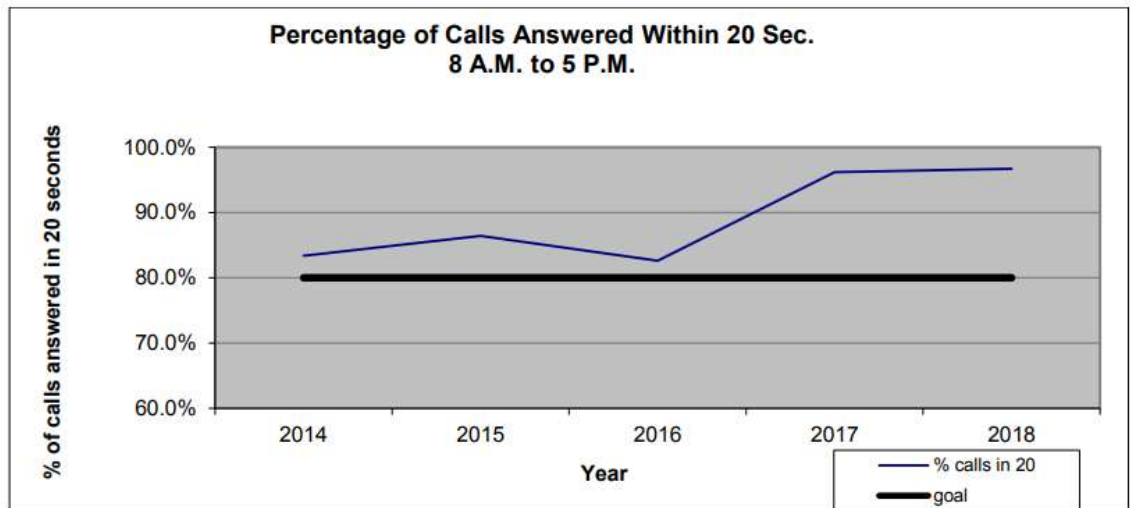
<sup>70</sup> The Department Response to Reply Comments at 7 (September 16, 2019).

Otter Tail Power supplied both a table and graph depicting their call center response times of their nine call centers that fielded over 60,700 calls from Minnesota, though their calls were also received from North and South Dakota.<sup>71</sup>

**Table 24**

	(A)	(B)	(C)	(D)	(E)
<b>Month</b>	<b>Offered</b>	<b>Calls Abandoned</b>	<b>Calls Answered after 20 Seconds</b>	<b>Answered within 20 Seconds</b>	<b>Percent Answered within 20 seconds<sup>1</sup></b>
January-2018	4214	29	45	4169	98.9
February-2018	3742	32	63	3679	98.3
March-2018	4794	33	104	4690	97.8
April-2018	4702	25	85	4617	98.2
May-2018	5497	43	102	5395	98.1
June-2018	5404	41	101	5303	98.1
July-2018	5717	31	175	5542	96.9
August-2018	6279	50	351	5928	94.4
September-2018	5855	45	367	5488	93.7
October-2018	6095	43	197	5898	96.8
November-2018	4897	41	238	4659	95.1
December-2018	3517	27	170	3347	95.2
Total	60713	440	1998	58715	96.7

<sup>1</sup>Column (D) / Column (A) = Percent answered within 20 Seconds



With 96.70 percent of calls answered within 20 seconds in 2018, the Department concluded that OTP is in compliance with Minnesota Rules, part 7826.1200.<sup>72</sup>

### **E. Emergency Medical Account Status (7826.1800)**

<sup>71</sup> Otter Tail Power 2018 Annual Safety, Reliability and Service Quality Report at 47-48 (April 1, 2019).

<sup>72</sup> Department Comments for Otter Tail Power Company at 21 (June 7, 2019).

Each utility must report the number of customers who sought emergency medical account status provided under Minnesota Statutes [216B.098](#), subd 5 and must also include the number of applicants who were granted or denied status, as well as the reason(s) for denial.

1. Xcel Energy

Xcel provided data related to customers seeking medical account status in Attachment G. Based on the information reported, 2,818 customers requesting medical account status in 2018; 2,267 granted and 551 denied – denials were based on customer(s) not returning the required form or doctor refusing to certify as Medical/Life Support.<sup>73</sup>

The Department acknowledged Xcel’s fulfillment of the rule after it calculated that about 80.4 percent of customers were granted medical account status and provided a table summarizing historical data.<sup>74</sup>

**Table 10: Residential Customers Requesting Emergency Medical Account Status**

Year	Requested Medical Acct. Status	Granted Medical Acct. Status	Percent Granted
2008	1,847	1,460	79.0%
2009	1,783	1,292	72.5%
2010	1,762	1,162	65.9%
2011	1,572	716	45.5%
2012	1,508	679	45.0%
2013	1,562	832	53.3%
2014	1,780	1,012	56.9%
2015	3,333	2,557	76.7%
2016	3,427	2,713	79.2%
2017	3,150	2,388	75.8%
2018	2,818	2,267	80.4%

2. Minnesota Power

MP reported that 206 customers applied for emergency medical account status with 199 being granted after customers provided the required signed physician documentation.<sup>75</sup> MP supplied reasons for each denial of the seven applications, many of them due to customers being unresponsive to MP’s attempts to obtain completed documentation for Emergency Medical Account status applications and a few not residing at the account holder’s house and, lastly, two applicants not meeting the requirements with “specific life-sustaining equipment.”<sup>76</sup> If interested in

<sup>73</sup> Xcel Energy 2018 Annual Safety, Reliability and Service Quality Report at Attachment G, p 74 (April 1, 2019).

<sup>74</sup> Department Comments for Xcel Energy at 16 (June 7, 2019).

<sup>75</sup> Minnesota Power 2018 Annual Safety, Reliability and Service Quality Report at Appendix A, p 33 (April 12, 2019).

<sup>76</sup> *Id.* at Appendix A, p 34.



the number of monthly applications, renewals, and removals, please see MP’s Figure 16 on page 33 of Appendix A.

The Department acknowledged MP’s fulfillment of the requirements of the rule.<sup>77</sup>

### 3. Otter Tail Power Company

The utility reported 17 customers requesting relief with the emergency medical status and all were granted.<sup>78</sup>

The Department acknowledged the utility’s fulfillment of the requirements of Minnesota Rules, part 7826.1800.<sup>79</sup>

## F. Customer Deposits (7826.1900)

The annual service quality report must include the number of customers who were required to make a deposit as a condition of receiving service.

### 1. Xcel Energy

In 2018, Xcel requested a total of 394 deposits as a condition of service for their residential customers that had filed for bankruptcy; the utility requests these deposits upon notification from the bankruptcy court and/or the customer of their bankruptcy petition.<sup>80</sup>

**Table 11: Customer Deposits Required**

Year	Number of Deposits
2008	805
2009	798
2010	657
2011	655
2012	622
2013	652
2014	606
2015	561
2016	362
2017	314
2018	394

The Department provided historical data in Table 11 of their comments before acknowledging Xcel’s fulfillment of this rule.<sup>81</sup>

### 2. Minnesota Power

<sup>77</sup> Department Comments for Minnesota Power at 23 (June 7, 2019).

<sup>78</sup> Otter Tail Power Reply Comments at 2 (June 28, 2019).

<sup>79</sup> Department Comments for Otter Tail Power Company at 21 (June 7, 2019).

<sup>80</sup> Xcel Energy 2018 Annual Safety, Reliability and Service Quality Report at 22 (April 1, 2019).

<sup>81</sup> Department Comments for Xcel Energy at 17 (June 7, 2019)

MP reported that they refunded all deposits in 2014, but may reconsider collection of deposits in the future.<sup>82</sup>

The Department acknowledged that, although MP did not collect deposits in 2018, they had fulfilled the rule and provided a table of historical data.<sup>83</sup>

**Table 13. MP’s Required Deposits**

<b>Year</b>	<b>Residential</b>	<b>Commercial</b>	<b>Total</b>
<b>2006</b>	153	1	154
<b>2007</b>	5	0	5
<b>2008</b>	74	1	75
<b>2009</b>	161	21	182
<b>2010</b>	190	24	214
<b>2011</b>	222	10	232
<b>2012</b>	315	1	316
<b>2013</b>	326	11	337
<b>2014</b>	0	0	0
<b>2015</b>	0	0	0
<b>2016</b>	0	0	0
<b>2017</b>	0	0	0
<b>2018</b>	0	0	0

### 3. Otter Tail Power Company

Otter Tail reported that 685 customers were required to make a deposit as a condition of receiving service during 2018, which is 13 fewer customer accounts when compared to 2017 numbers.<sup>84</sup>

The Department acknowledged Otter Tail Power’s fulfillment of the rule and provided a table that included the previous thirteen years.<sup>85</sup>

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<sup>82</sup> Minnesota Power 2018 Annual Safety, Reliability and Service Quality Report at Appendix A, p 35 (April 12, 2019).

<sup>83</sup> Department Comments for Minnesota Power at 24 (June 7, 2019).

<sup>84</sup> Otter Tail Power 2018 Annual Safety, Reliability and Service Quality Report at 50 (April 1, 2019).

<sup>85</sup> Department Comments for Otter Tail Power Company at 22 (June 7, 2019).

**Table 14: Customer Deposits Required**

	<b>Number of Deposits Required</b>	<b>Total Customers Served</b>
2005	417	58,516
2006	395	58,841
2007	509	59,171
2008	700	59,364
2009	869	59,421
2010	635	59,425
2011	807	59,486
2012	847	59,615
2013	895	59,849
2014	783	61,169
2015	597	60,232
2016	715	61,226
2017	698	61,568
2018	685	61,888 <sup>12</sup>

## **G. Customer Complaints (7826.2000)**

Utilities must provide a detailed report on complaints by customer class and calendar month that include the following information:

- A. The number of complaints received.
- B. The number and percentage of complaints alleging billing errors, inaccurate metering, wrongful disconnection, high bills, inadequate service, and the number involving service extension intervals, service-restoration intervals, and any other identifiable subject matter involved in five percent or more of customer complaints.
- C. The number and percentage of complaints resolved upon initial inquiry, within ten days, and longer than ten days.
- D. The number and percentage of all complaints resolved by taking any of the following actions:
  - (1) Taking the action the customer requested;
  - (2) Taking an action the customer and the utility agree is an acceptable compromise.
  - (3) Providing the customer with information that demonstrates that the situation complained of is not reasonably within the control of the utility.
  - (4) Refusing to take the action the customer requested.
- E. The number of complaints forwarded to the utility by the commission’s Consumer Affairs Office for further investigation and action.

### **1. Xcel Energy**

The sixteen-page Attachment J in Xcel’s Annual Report included complaints handled by either the utility’s three call center(s) or the Company’s Customer

Advocate Group. A total of 664 complaints were recorded by Customer Advocates with 27 commercial, 635 residential, and 2 industrial.<sup>86</sup>

Xcel reported the percentage of complaints that were resolved within the timelines expressed in the rule – initial, within ten days, and more than ten days. The majority of complaints across all customer classes were resolved within ten days or less.<sup>87</sup> Please see the large table on page 3 of Attachment J for more details.

The utility had 248 complaints forwarded to them from the Commission’s Consumer Affairs Office, where all but twelve were residential.<sup>88</sup> This is consistent with reporting in the Company’s Quality Service Plan Tariff Annual Report in E,G-002/CI-02-2034. Within the narrative of the service quality report, the Company references their October 2018 filing to analyze the “material increase in the number of customer complaints from the CAO” to ensure they are “properly recording ‘complaints’ and ‘inquiries’ consistent with prevailing CAO protocols.”<sup>89</sup> The Company brings forward that “the change in CAO protocol beginning in 2018 invalidates the statistical foundation on which the present QSP customer complaints performance threshold rests, materially increases the Company’s risk of financial penalty, and renders historical comparisons of our performance invalid.”<sup>90 91</sup>

Lastly, Xcel included monthly reports in Attachment J that summarize calls received through the Company’s call centers, the type of concern that was shared, from which customer base (commercial, residential, industrial), and how calls were handled. Please see pages 5 to 16 of Attachment J (PDF pages 80-91).

Of the 664 complaints received in 2018, the Department calculated that 20.60 percent were resolved upon inquiry by Xcel’s Customer Advocate Group and “26.70 percent of these complaints were resolved by taking the action the customer requested.”<sup>92</sup> The most frequent complaint category that Advocates fielded was “inadequate service.”<sup>93</sup>

It was noted by the Department that Xcel also received 624,399 complaints in its Call Centers throughout 2018 with approximately 98 percent being resolved by taking the action the customer requested.<sup>94</sup> In 2018, the highest complaint

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<sup>86</sup> Xcel Energy 2018 Annual Safety, Reliability and Service Quality Report at Attachment J, p 76 (April 1, 2019).

<sup>87</sup> *Id.* at Attachment J, p 78.

<sup>88</sup> *Id.* at Attachment J, p 79.

<sup>89</sup> *Id.* at 22-23.

<sup>90</sup> *Id.* at 23.

<sup>91</sup> Staff notes two factors have influenced increase in reported customer complaints: first, CAO has expanded the ways that customers may submit complaints (online, email, and regular mail, etc.) and second, CAO has expanded the definition of customer complaint. Therefore, an increase in reported customer complaints should not be seen as a decline in service.

<sup>92</sup> Department Comments for Xcel Energy at 18 (June 7, 2019).

<sup>93</sup> *Id.*

<sup>94</sup> *Id.*

category for all customers that the Call Centers experienced was “billing errors.”<sup>95</sup> The table below contains a limited summary of Xcel’s customer complaint history provided in the Department’s comments.

**Table 12: Selected Summary of Customer Complaints<sup>27</sup>**

Year	Number of Complaints	Inadequate Service	Wrongful Disconnect	Billing Error	Resolved Upon Initial Inquiry	Took Action Customer Requested
2010	693	44.90%	21.90%	18.20%	17.00%	29.10%
2011	627	49.10%	17.20%	16.70%	13.20%	28.20%
2012	613	53.50%	19.70%	17.30%	18.60%	27.41%
2013	745	55.80%	15.60%	13.80%	18.90%	38.26%
2014	770	53.20%	19.70%	14.80%	16.80%	51.30%
2015	789	52.50%	23.40%	13.30%	14.30%	29.50%
2016	547	52.10%	19.00%	14.60%	16.30%	32.70%
2017	572	53.50%	24.50%	10.50%	18.00%	27.10%
2018	664	58.10%	18.80%	11.60%	20.60%	26.70%

The Department acknowledged Xcel’s fulfillment of the requirements of the rule.

2. Minnesota Power

MP reported the number of complaints received and noted that any customer classes other than residential or commercial are handled individually and not recorded in their Customer Information System.<sup>96</sup> A total of 630 complaints were received in 2018, with 71 commercial and 559 residential.

In MP’s Table 11 on page 37 of Appendix A, we see that at 62%, high billing was the leading customer complaint, followed by incorrect metering at just under 18%.<sup>97</sup>

Complaints were resolved as reported in their table on page 37. A large majority of complaints (62%) were resolved in the same day.

Resolution Reason	Commercial	Residential	Total	% Resolved Contacts
Compromise	25	159	184	29.21%
Customer Request	17	74	91	14.44%
No Control	29	323	352	55.87%
Refuse		3	3	0.48%
<b>Total</b>	<b>71</b>	<b>559</b>	<b>630</b>	<b>100.00%</b>

TABLE 13: RESIDENTIAL COMPLAINTS RESOLVED 2018

<sup>95</sup> Department Comments for Xcel Energy at 18 (June 7, 2019).

<sup>96</sup> Minnesota Power 2018 Annual Safety, Reliability and Service Quality Report at Appendix A, p 36 (April 12, 2019).

<sup>97</sup> *Id.* at Appendix A, p 37.

As can be seen in the table below, the predominant action taken to resolve complaints was to let the customer know that the issue was outside of the utility’s control at 55.87% followed by compromising with the customer at 29.21%.

Days To Resolution	Customer Group	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	% of Total
Greater Than 10 Days	Commercial	1	2	3		3		1	1	1	1		2	15	14%
Greater Than 10 Days	Residential	9	7	8	2	4	2	7	7	8	6	5	11	76	
Less Than 10 Days	Commercial	2	5	1	2	6	2	2	2	1		1		24	23%
Less Than 10 Days	Residential	14	15	16	8	12	9	6	9	13	8	5	7	122	
Same Day Resolution	Commercial	3	3	2	3	3	2		2	2	3	3	6	32	62%
Same Day Resolution	Residential	55	59	48	29	35	18	18	23	23	15	13	25	361	
<b>Total</b>		<b>84</b>	<b>91</b>	<b>78</b>	<b>44</b>	<b>63</b>	<b>33</b>	<b>34</b>	<b>44</b>	<b>48</b>	<b>33</b>	<b>27</b>	<b>51</b>	<b>630</b>	<b>100%</b>

TABLE 12: TIMEFRAME OF COMPLAINTS RESOLVED 2018

Finally, MP reported that 7 complaints from the Commission’s Consumer Affairs Office (CAO) were forward to them “for further investigation and action in 2017.”<sup>98</sup>

The Department acknowledged MP’s fulfillment of the rule. The Department’s Tables 14 and 15 shows the historical number of complaints received by the Company and complaints forwarded by CAO to the Company.<sup>99</sup>

**Table 14. Summary Complaint Totals**

Year	Commercial	Residential	Industrial	Total
2009	137	1,534	0	1,671
2010	141	1,585	0	1,726
2011	76	1,178	0	1,254
2012	81	780	0	861
2013	63	663	0	726
2014	64	1,045	0	1,109
2015	27	540	0	567
2016	46	388	0	434
2017	56	641	0	697
2018	71	559	0	630

<sup>98</sup> Minnesota Power 2018 Annual Safety, Reliability and Service Quality Report, Appendix A at 38 (April 12, 2019).

<sup>99</sup> Department Comments for Minnesota Power at 25 (June 7, 2019).



**Table 15. Complaints Forwarded by the CAO**

Year	# of Complaints
2009	4
2010	15
2011	10
2012	9
2013	11
2014	13
2015	13
2016	22
2017	14
2018	7

“The number of complaints forwarded to the Company by the Commission’s Consumer Affairs Office in 2018 was much lower than previous years’ average of 12.3.”<sup>100</sup>

3. Otter Tail Power Company

In 2018, the utility received 34 complaints spanning across seven complaint types, which are summarized in Table 25 on page 51 of their filing. The “other” type in the table below were complaints that included such as things as rebate timing, planned outages, and third party meter readers – topics that may not fit within the complaint sections of their Customer Information System.<sup>101</sup>

**Table 25**

Complaint Type	Total	Percent of Total
Alleged Billing Errors	0	0.00%
Load Control	0	0.00%
High Bills	2	5.88%
Inaccurate Meter reading	0	0.00%
Tree Trimming	0	0.00%
Other	16	47.06%
Property Damage	16	47.06%
	34	100.00%

Another table from the page age indicates that Otter Tail reported that nearly half (16) of the complaints were resolved on initial inquiry, with 17 needing up to ten days and one required more than ten days.

<sup>100</sup> Department Comments for Minnesota Power at 26 (June 7, 2019).

<sup>101</sup> Otter Tail Power 2018 Annual Safety, Reliability and Service Quality Report at 51 (April 1, 2019).



**Table 26**

<b>2018</b>		
<b>Resolved by</b>	<b>Total</b>	<b>Percentage</b>
(1) Resolved on Initial Inquiry	16	47%
(2) Resolved within 10 days	17	50%
(3) Resolved in greater than 10 days	1	3%
<b>Grand Total</b>	<b>34</b>	<b>100.00%</b>

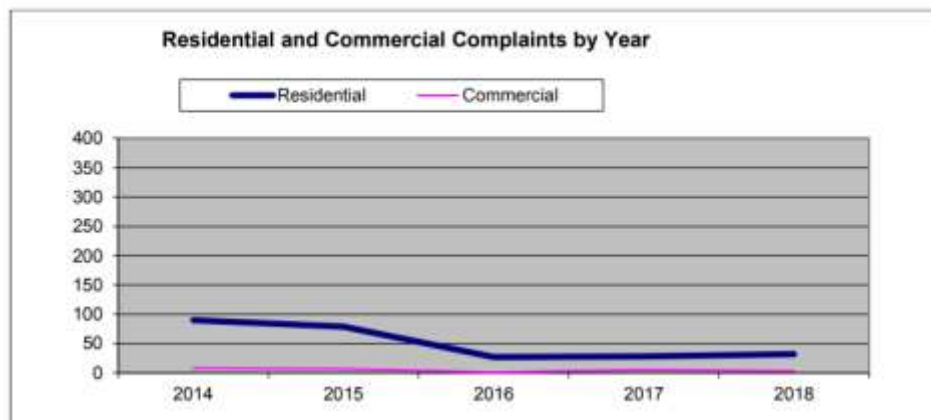
Otter Tail Power indicated that nearly half of the action taken by customer service staff to remedy a complaint was a compromise with the customer. Please see Table 27 from page 52 for additional details.

**Table 27**

<b>Action Taken</b>	<b>Total</b>	<b>Percentage</b>
(1) Took action the Customer requested	7	20.59%
(2) Provided the customer with information that demonstrates that the situation complained of is not reasonably within the control of Otter Tail	8	23.53%
(3) Took an action the customer and the utility agree is an acceptable compromise	16	47.06%
(4) Refused to take action the customer requested	3	8.82%
<b>Grand Total</b>	<b>34</b>	<b>100.00%</b>

The utility provided a graph depicting the consistent decrease of residential and commercial complaints since 2014.

**Figure 18**



There were five complaints forwarded to the utility from the Commission’s Consumers Affairs Office that have been resolved; this was an increase from 2017 by three.<sup>102</sup>

The Department noted that 47 percent of 2018 complaints were listed in the “other” category before it acknowledged Otter Tail Power’s fulfillment of the rule requirements. Table 15 provides data from the previous 12 years.<sup>103</sup>

**Table 15: OTP Customer Complaint Selected Summary**

	Number of Complaints	High Bills	Billing Error	Service Restoration	Resolved Upon Initial Inquiry	Took Action Customer Requested
2006	175	39%	7%	2%	54%	49%
2007	220	27%	29%	5%	66%	46%
2008	325	52%	18%	2%	60%	34%
2009	185	29%	14%	5%	78%	36%
2010	91	26%	11%	11%	78%	25%
2011	110	19%	9%	10%	73%	30%
2012	61	7%	11%	7%	72%	32%
2013	133	9%	17%	5%	92%	21%
2014	98	12%	11%	4%	83%	31%
2015	86	22%	22%	0%	77%	23%
2016	28	0%	14%	0%	93%	54%
2017	33	6%	16%	0%	91%	24%
2018	34	6%	0%	0%	47%	21%

## IV. Staff Analysis

### a. Utility Performance

As can be seen in the reports and Department’s comments, the utilities are performing in accordance to the service quality rules.

A request was made for MP to include specific details related to their calls received at their Call Centers so that both the Department and the Commission are able to ensure the utility is meeting the standards set forth in the rules. Although this was likely an oversight as this information was provided historically and provided in reply comments, staff included this as **Decision Option 3**.

### b. MP’s Reconnect Program

MP committed to resubmitting its reconnect program that was brought forward in the 2018 SRSQ report. The utility was going to work with stakeholders and compile any necessary information to address stakeholders’ concerns.

To further encourage the Company to focus its efforts in refiling the proposal and increase the chances of it doing so, the Commission set a deadline of December 1, 2019. Staff wishes to note that MP filed their proposal, which can be found in Docket No. E015/M-19-766.

<sup>102</sup> Otter Tail Power 2018 Annual Safety, Reliability and Service Quality Report at 53 (April 1, 2019).

<sup>103</sup> Department Comments for Otter Tail Power Company at 23 (June 7, 2019).

**c. Creating Utility Performance Summaries for the Public**

In last year's review of the service quality reports, staff suggested that utilities create a one- or two-page summary of their reliability and customer service metrics in a digestible format for the public. These annual reports hold a wealth of information that many customers, stakeholders, and organizations would appreciate access to and the Commission was very receptive to this effort. Staff hopes to engage with the utilities in 2020 to determine the content and format through a Commission-led process.

**d. Third Party Data Review**

As part of MP's 2018 service quality review, the utility engaged in a third party review of their data and processes. Staff raises an idea for the Commission's consideration: that Xcel and Otter Tail Power also undertake a similar review of their disconnection policies and procedures. The review of MP's disconnection policies was, in staff's view, a useful exercise, and consistent with the principle that occasional reviews of utility practices can help ensure continued high standards. While there is reason to suggest that a review be made of both OTP's and Xcel's disconnection practices, there is stronger rationale for a review of Xcel's, since its pending PBR docket (CI-17-401) will rely heavily on the data Xcel reports to the Commission.<sup>104</sup>

With that being said, staff realizes no party raised this idea and so it is a new proposal. The Commission may choose to wait until such time that parties have had a chance to weigh in, may grant oral argument on the topic, or may choose not to take up the idea.

**e. Developing Customer Service Metrics**

MP highlighted again this year that some of the 15+-year-old service quality rules may not be in-step with current and future communication trends and therefore not able to adequately measure a utility's customer service efforts. With specific attention to the rules regarding Call Center Response Times and even Meter Reading Performance, staff agrees that with the advent of both self-service, interactive communication platforms and the deployment of AMI, the rules are not keeping up with technology. The development of new customer service metrics would be a grand undertaking requiring full stakeholder and utility involvement if done through a Commission process.

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<sup>104</sup> Staff would also suggest that the same entity that performed the MP review also perform the review of Xcel and OTP's policies, since that entity may have experience and knowledge it can transfer to these new reviews.

## V. Decision Options (for Service Reliability and Service Quality)

1. Accept Xcel Energy’s, Otter Tail Power’s, and Minnesota Power’s annual Safety, Service Quality, and Reliability reports for 2018. *(Minnesota Power, Otter Tail Power Company, Xcel)*
2. Clarify the following reporting requirements from the Commission’s March 19, 2019 Order, as specified in Attachment B. Delegate authority to the Executive Secretary to establish final report formatting and make minor clarifications where necessary. *(Staff)*
3. In their 2020 reports, utilities shall discuss the feasibility of the following metric, and if the utility does not think the metric is feasible, provide an alternative:  
Provide a comparison of the reliability (SAIDI, SAIFI, CAIDI, MAIFI, normalized/non-normalized) of feeders with grid modernization investments, such as AMI or FLISR, to the historic 5-year average reliability for the same feeders before grid modernization investments. *(Staff)*
4. Require the utilities to make a compliance filing, within 30 days of the order, with additional historical data as follows:
  - a. For Minnesota Power and Xcel Energy, causes of sustained customer outages, by service center, from 2010 to 2018, as a spreadsheet, (.xlsx).
  - b. CEMI (4+, 5+, 6+) and CELI historical data (6, 12, and 24 hours), both normalized and non-normalized, from 2010 to 2018, as a spreadsheet, (.xlsx). *(Staff)*

### Minnesota Power

5. Set Minnesota Power’s Reliability Standards for 2019 at the 2016 levels. *(Department, MP)*

	SAIDI	SAIFI	CAIDI
<b>2016 Standard</b>	98.19	1.02	96.26

6. Direct Minnesota Power to provide an update on the Colbyville 240 feeder in next year’s report, specifically to note whether any work on the feeder has made an improvement in reliability. *(Department)*
7. Request that Minnesota Power include specific number of calls received and calls answered within 20 seconds, both for business and non-business hours and by type in accordance with Minnesota Rules 7826.1700 and 7826.1200 in future SRSQ annual reports. *(Department)*

**Otter Tail Power**

8. Set Otter Tail Power’s Reliability Standards for 2019 at the levels set for 2013.  
*(Department, OTP)*

Work Center	SAIDI	SAIFI	CAIDI
<b>Bemidji</b>	70.64	1.26	56.06
<b>Crookston</b>	69.33	1.19	58.26
<b>Fergus Falls</b>	55.97	1.11	60.33
<b>Milbank</b>	75.49	1.82	41.48
<b>Morris</b>	55.78	1.01	55.23
<b>Wahpeton</b>	57.24	1.13	50.65
<b>All MN Customers</b>	64.95	1.13	57.48

**Xcel Energy**

9. Set Xcel Energy’s Reliability Standards for 2018 at the following levels.  
*(Department, Xcel)*

Work Center	SAIDI	SAIFI	CAIDI
<b>Metro East</b>	89.78	0.86	103.94
<b>Metro West</b>	82.08	0.82	100.37
<b>Northwest</b>	85.86	0.76	113.01
<b>Southeast</b>	94.82	0.76	122.04

10. Delegate authority to the Executive Secretary to put out for comment the staff proposal on locational reliability and equity in reliability, as described in Attachment C. *(Staff)*