



414 Nicollet Mall  
Minneapolis, MN 55401

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April 1, 2025

**—Via Electronic Filing—**

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

RE: 2024 ANNUAL REPORT AND PETITION  
SAFETY, RELIABILITY AND SERVICE QUALITY PERFORMANCE AND PROPOSED  
RELIABILITY MEASURES  
DOCKET NO. E002/M-25-27

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed 2024 Electric Annual Safety, Reliability and Service Quality Performance Report and Petition (Report). We respectfully request the Commission accept our 2024 Report and approve our proposed reliability standards for 2025.

For ease of review, we present our Report in three parts as noted below.

- Part I: Safety and Service Quality for 2024;
- Part II: Reliability Standards and Request for Approval of Electric Reliability Standards for 2025; and
- Part III: January 13, 2025 Order Compliance

In addition, our Report includes three attachments in live Excel format:

- Attachment K – Outage Cause Codes for Graphs 1A-1D
- Attachment L – Circuit Table
- Attachment Q – 2024 Service Extensions

**Security, Trade Secret, and Private Data on Individuals Justification**

This submission contains information regarding the Company's feeders and other system components, and associated customers served. This information is "security

information” as defined by Minn. Stat. § 13.37, subd. 1(a). As we have explained in past filings related to our treatment of customer data, we take our responsibility for the data we maintain in order to provide our customers with reliable and safe service very seriously.

Nearly daily, we become aware of data breaches impacting individuals and organizations. Responsible access to sensitive data must be balanced with accountability for third parties to demonstrate their actions with the data will be in the public interest before gaining access. Additionally, as we have pointed out in the past with respect to utility release of customer data, once released by the utility, the Commission will have no jurisdiction over third parties – and the utilities lose any ability to control its use, sale, or other dissemination.

Our Company principles with respect to privacy are:

- Maintain customer privacy, confidentiality, and security in terms of their usage and how they are connected to the grid; and
- Avoid revealing details that would give a bad actor information to target an attack for maximum impact (ex. peak load, equipment capacities, number of customers, how critical infrastructure is connected to the grid, etc.).

Xcel Energy believes some information contained herein could be manipulated to reveal the location and size of facilities serving our customers. The public disclosure or use of this information creates a risk because those who want to disrupt the electrical grid for political or other reasons may learn which facilities to target to create the greatest disruption. For this reason, pursuant to Minn. Stat. § 13.37, subd. 2, we have excised this data from the public version of Attachment L of our filing.

This submission also contains settlement information about one claim against the company where the Company and the settling plaintiff agreed the settlement amount would be maintained as confidential. This information is “trade secret” information as defined by Minn. Stat. §13.37(1)(b). This information derives independent economic value from not being generally known or readily ascertainable by others who could obtain a financial advantage from its use. For this reason, pursuant to Minn. Stat. § 13.37, subd. 2, we have excised this data from the public version of Attachment B our filing.

We have electronically filed this document with the Minnesota Public Utilities Commission and notice of the filing has been served on the parties on the attached service list.

Please contact Nathan Kostiuk at [Nathan.c.kostiuk@xcelenergy.com](mailto:Nathan.c.kostiuk@xcelenergy.com) or (612) 215-4629 or me at [Nicholas.f.martin@xcelenergy.com](mailto:Nicholas.f.martin@xcelenergy.com) or (612) 330-6255 if you have any questions regarding this filing.

Sincerely,

/s/

NICHOLAS MARTIN  
DIRECTOR, STRATEGIC OUTREACH AND ADVOCACY

Enclosures  
c: Service List

## **REQUIRED INFORMATION**

### **I. SUMMARY OF FILING**

A one-paragraph summary is attached to this filing pursuant to Minn. R. 7829.1300, subp. 1.

### **II. SERVICE ON OTHER PARTIES**

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document with the Commission. Pursuant to Minn. R. 7829.1300, subp. 2, the Company has served a copy of this filing on the Department of Commerce and the Office of the Attorney General. A summary of the filing has been served on all parties on the enclosed service list.

### **III. GENERAL FILING INFORMATION**

Pursuant to Minn. R. 7829.1300, subp. 3, the Company provides the following information.

#### **A. Name, Address, and Telephone Number of Utility**

Northern States Power Company doing business as:  
Xcel Energy  
414 Nicollet Mall  
Minneapolis, MN 55401  
(612) 330-5500

#### **B. Name, Address, and Telephone Number of Utility Attorney**

Riley Conlin  
Principal Attorney  
Xcel Energy  
Minneapolis, MN 55401  
[riley.conlin@xcelenergy.com](mailto:riley.conlin@xcelenergy.com)

#### **C. Date of Filing and Date Standards Take Effect**

The date of this filing is April 1, 2025. The Company requests that the Commission accept the attached Report on the Company's performance for 2024. Additionally, we request that our proposed reliability standards be approved for the year 2025.

## REQUIRED INFORMATION

Our report on reliability performance for 2024, subject to the standards approved by the Commission, was filed on or before April 1, 2025, as required under Minn. R. 7826.0500, subp.1, for the January 1 through December 31, 2024 period with a supplemental filing being submitted in the August / September 2025 timeframe when IEEE data becomes available.

### **D. Statute Controlling Schedule for Processing the Filing**

No specific statute imposes a schedule controlling the processing of this filing. Pursuant to Minn. R. 7826.1300, this Report is to be filed as a miscellaneous filing under Minn. R. 7829.0100, subp. 11. Under Minn. R. 7829.1400 governing miscellaneous filings, initial comments are due within 30 days of filing, with reply comments due ten days thereafter.

### **E. Utility Employee Responsible for Filing**

Nicholas Martin  
Director, Strategic Outreach and Advocacy  
Manager, Policy and Outreach  
Xcel Energy  
414 Nicollet Mall – 401 7<sup>th</sup> Floor  
Minneapolis, MN 55401  
(612) 330-6255

## **IV. MISCELLANEOUS INFORMATION**

Pursuant to Minn. R. 7829.0700, the Company requests that the following persons be placed on the Commission's official service list for this proceeding:

Riley Conlin  
Principal Attorney  
Xcel Energy  
414 Nicollet Mall, 401 – 8<sup>th</sup> Floor  
Minneapolis, MN 55401  
[riley.conlin@xcelenergy.com](mailto:riley.conlin@xcelenergy.com)

Christine Schwartz  
Regulatory Administrator  
Xcel Energy  
414 Nicollet Mall, 401 – 7<sup>th</sup> Floor  
Minneapolis, MN 55401  
[regulatory.records@xcelenergy.com](mailto:regulatory.records@xcelenergy.com)

Any information requests in this proceeding should be submitted to Ms. Schwartz at the Regulatory Records email address above.

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STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

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

Chair  
Commissioner  
Commissioner  
Commissioner  
Commissioner

IN THE MATTER OF NORTHERN STATES  
POWER COMPANY’S ANNUAL REPORT  
ON SAFETY, RELIABILITY, AND SERVICE  
QUALITY FOR 2024; AND PETITION FOR  
APPROVAL OF ELECTRIC RELIABILITY  
STANDARDS FOR 2025

DOCKET NO. E002/M-25-27

**ANNUAL REPORT AND PETITION**

**INTRODUCTION**

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission the attached Annual Report on our safety, reliability, and service quality performance for 2024. We make this filing pursuant to Minn. R. 7826.0400, 7826.0500, and 7826.1300. This filing also includes our Petition for approval of the Company’s proposed reliability standards for the year 2025, as required under Minn. R. 7826.0600. In addition, the Annual Report contains several compliance items from various dockets.

We respectfully request that the Commission accept our annual report for 2024, approve our proposed reliability standards for 2025, and approve our request for a variance to Minn. Rule 7820.2500.

**I. DESCRIPTION AND PURPOSE OF FILING**

**A. Background**

Legislation passed in 2001 required that the Commission establish safety, reliability, and service quality standards for electric distribution utilities. After a rulemaking process, the Commission adopted rules that became effective on January 28, 2003. These rules contain both performance standards and reporting requirements. Additionally, the rules require individual utilities to propose electric reliability

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standards each year for approval by the Commission. Over time, the Commission added additional compliance obligations through various Order Points.

We have separated the Annual Report, as laid out in Minnesota Rules, Chapter 7826, Electric Utility Standards, into three parts: Part I contains Safety and Service Quality standards; Part II contains the Reliability metrics and proposed standards; Part III separately addresses, for ease of review by parties and the Commission, Order Points in the Commission's January 13, 2025 Order in Docket No. E002/M-24-27 that represent new requirements not part of prior annual reports.

In this Petition, we request the Commission take three actions:

- Accept the Company's Annual Report for 2024,
- Approve our proposed reliability standards for 2025, and
- Approve our request for a variance to Minn. Rule 7820.2500.

Each of these are discussed in more detail below.

**A. Accept the Company's Annual Report for 2024**

Attached to this Petition is the Company's Annual Report, detailing the Company's safety, reliability and service quality performance for 2024. The Company's Annual Report, and its attachments, are consistent with the Minnesota service quality reporting rules found in Minn. R. Ch. 7826, as well as the various Commission Order Points adopted over the years. In addition to responding to the new compliance obligations ordered from the 2017 through 2024 Annual Reports, the Company has included a compliance matrix to assist our stakeholders to find the information they are looking for within the Annual Report. We respectfully request the Commission accept the Company's Annual Report for 2024.

**B. Approve Proposed Reliability Standards for 2025**

Minn. R. 7826.0600, subp. 1, requires the Company to propose 2025 standards for System Average Interruption Frequency Index (SAIFI), System Average Interruption Duration Index (SAIDI), and Customer Average Interruption Duration Index (CAIDI). The Company proposes setting the 2025 standards based on the 2025 Institute of Electrical and Electronics Engineers (IEEE) benchmarking results as follows:

- Statewide reliability: IEEE second quartile for large utilities;

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- Metro East and Metro West work centers: IEEE second quartile for large utilities; and
- Southeast and Northwest work centers: IEEE second quartile for medium utilities.

Our proposal is consistent with the 2025 standards established in the Commission's November 9, 2022 Order in Docket No. E002/M-22-162, Order Point 4. Because the IEEE benchmarking data for the previous year is not available until third quarter of the following year, the 2024 benchmarking data will not be available until the summer of 2025. After this data is received, the Company intends to file a supplement to its 2024 Annual Report providing the 2024 benchmarking information compared to our 2024 results, along with an explanation and action plan for any standards not met for 2024.

**C. Approve our request for a variance to Minn. Rule 7820.2500.**

Minn. Rule 7820.2500 states that "Service may be disconnected only in conjunction with a personal visit by a representative of the utility to the address where the service is rendered and an attempt to make personal contact with the customer at the address. If the address is a building containing two or more dwelling units, the representative shall make a personal visit to the door of the customer's dwelling unit within the building. If security provisions in the building preclude free access on the part of the representative, the representative shall attempt to gain access to the building from the caretaker, for the purpose of attempting to make personal contact with the customer. The representative of the utility shall at all times be capable of receiving payment, if nonpayment is the cause of the disconnection of service, or the representative shall be able to certify that the cause of disconnection has been remedied by the customer."

The deployment of AMI provides the Company with the ability to remotely manage customer disconnections and reconnections. We believe this technology, together with the use of calls, voicemails, and one additional method of electronic communication where the customer has provided consent to do so,<sup>1</sup> represents the most effective means of communication with customers prior to service disconnection. The Company expects to continue indefinitely requesting a variance to Minn. Rule 7820.2500.

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<sup>1</sup> Per the Commission's January 13, 2025 Order in Docket No. E-002/M-24-27, Order Point 19. See Part III of our annual report.



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**V. EFFECT OF CHANGE UPON XCEL ENERGY REVENUE**

Approval of our Annual Report and the reliability performance standards proposed in this Petition will not result in any changes to Xcel Energy's revenue.

**CONCLUSION**

Xcel Energy is committed to providing our customers with safe, reliable and high quality customer service. We appreciate this opportunity to report our performance to the Commission, and respectfully request that the Commission accept our Annual Report on safety, reliability, and service quality. We also request that the Commission approve our proposed reliability standards for 2025 as detailed in this Petition, and approve our request for a variance to Minn. Rule 7820.2500.

Dated: April 1, 2025

Northern States Power Company

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STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

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

Chair  
Commissioner  
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IN THE MATTER OF NORTHERN STATES  
POWER COMPANY'S ANNUAL REPORT ON  
SAFETY, RELIABILITY, AND SERVICE  
QUALITY FOR 2024; AND PETITION FOR  
APPROVAL OF ELECTRIC RELIABILITY  
STANDARDS FOR 2025

DOCKET No. E002/M-25-27

**ANNUAL REPORT AND PETITION**

**SUMMARY OF FILING**

Please take notice that on April 1, 2025 Northern States Power Company, doing business as Xcel Energy, filed with the Minnesota Public Utilities Commission a Petition requesting approval of its 2024 Electric Annual Service Quality Performance Report, requesting the Commission approve our proposed reliability standards for 2025, and requesting a variance to Minn. Rule 7820.2500.

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**Xcel Energy's**  
**Service Quality Annual Report**  
**Part I**

Safety and Service Quality for 2024

April 1, 2025  
Docket No. E002/M-25-27

TABLE OF CONTENTS

PART I - SERVICE QUALITY AND REPORTING STANDARDS

I	Filing Requirements	1
II.	Annual Safety Report for 2024	1
A.	Reports to OSHA and the Minnesota Department of Labor & Industry	1
B.	Incidents Resulting in Compensation Because of downed Wires or Other Electrical System Failures	2
III.	Service Quality Performance for 2024	2
A.	Meter Reading	2
B.	Meter Equipment Malfunctions	7
C.	Involuntary Disconnections	8
D.	Service Extension Response Times	9
E.	Call Center Response Times	12
F.	Emergency Medical Account	14
G.	Customer Deposits	15
H.	Customer Complaints	16
	1 Summary Report	16
	2 Reporting Categories	17
I.	Electronic Customer Contacts	18
J.	AMI Disconnect/Reconnect Reporting	20

PART II - SAFETY AND RELIABILITY METRICS

IV.	Reliability Performance Report 2024	29
A.	2024 Reliability Performance Summary and Plans	30
B.	Reliability Metrics Contemplated by the Commission's Rules	32
	1 SAIDI, SAIFI, and CAIDI Metrics	32
	a Overview of Company’s SAIDI, SAIFI and CAIDI Performance	32
	b Additional contemplated SAIDI, SAIFI, and CAIDI metrics based on grid modernization investments	41
	2 Action Plan for Failures to Comply by Work Center	42
	a Reliability Performance as Compared to Standards	42
	b Worst Performing Feeders by Work Center	62
	3 Bulk Power Interruptions	64
	4 Outage Communications	64
	a Outage Communications to the CAO	64
	b Outage Communications to Customers (Estimated Restoration)	67
	5 Voltage Fluctuations	69
	6 Staffing	70
C.	Other Reliability Metrics Requested by Commission	72
	1 MAIFI	72
	2 Customers Experiencing Mutiple Interruptions (CEMI)	77
	3 Customers Experiencing Lengthy Interruptions (CELI)	80
V.	Proposed Electric Reliability Standards for 2025	83
A.	Benchmarking the Company's SAIDI, SAIFI, and CAIDI	83
B.	Recommendation for 2025 Standards	84

**PART III - JANUARY 13, 2025 ORDER COMPLIANCE**

VI. January 13, 2025 Order Compliance	91
A. Background	91
B. Requirements of January 13, 2025 Order	91
1 Service Timelines	91
2 Variance to Minn. Rule 7820.2500	92
3 Methods for Final Contact Prior to Disconnection	92
4 Enhanced Outreach for Energy Assistance	93
5 Enhanced Access to Information on Disconnection	93
6 Reconnect Previously Disconnected Customers during Extreme Heat and High Air Quality Index Events	94
A. Extreme Heat Events	95
B. Air Quality Alert Events	96
C. Proposed Steps to be Taken During a Heat Event or AQI Event	97
D. Areas of Concern with Implementation of Plan	99
1 Safety Concerns	99
2 System Limitations	99
3 Increased Complaints and Customer Wait Times	99
E. Costs and Timeline to Implement Heat and AQI Plans	100
1 Associated Costs	200
2 Timeline for System Enhancements	101
3 Assumptions	101
F. Current Medical Certification Process	102
7 Enhanced Outreach to Medically Vulnerable Customers	102
8 Mitigating Disconnections: Reduced Down Payments, Higher Thresholds and Longer Advance Notice	102
9 Average Down Payments Received from Customers	105
10 Evaluation of Possible Additional Measures Related to Disconnection, Reconnection, and Energy Assistance	107
11 Proposed New Customer Assistance Program Funded from Late Payment Charges	111
12 Landlord Failure to Pay	111
13 Information and Training on Racial Disparities	112
14 Tariff Revisions	113
15 Additional Data Layers Added to Interactive Service Quality Map	114
16 Workgroup on Affordability Program Reporting	115
17 Periodic Replication of Disparities Studies	116
18 Further Analysis of Disparities in Long Outages (CELI-12)	116
19 Third-Party Evaluation of Practices and Policies for Capital Investment Planning, Outage Restoration, and Disconnections	125
VII. Conclusion	127

## **ATTACHMENTS TO FILING**

- A OSHA Safety Report
- B Claims Report
- C Meter Reading Report
- D Meter Equipment Malfunctions
- E Involuntary Disconnections
- F Call Center Response Times
- G Customer Complaints
- H Remote and Polyphase Disconnect/Reconnect
- I Infographic
- J Distribution Performance
- K Outage Cause Codes
- L Circuit Table
- M Feeder Outage Information
- N Bulk Power Supply Interruption
- O Major Service Interruption
- P MAIFI Reporting
- Q Service Extensions
- R Service Extension Requests
- S Service Extension Requests - Average Days to Complete

Requirement	Item	Location
<b>MINNESOTA RULE REQUIREMENTS</b>		
<b>7826.0400 ANNUAL SAFETY REPORT.</b>		
	A. summaries of all reports filed with the United States Occupational Safety and Health Administration and the Occupational Safety and Health Division of the Minnesota Department of Labor and Industry during the calendar year	Section II.A
	B. a description of all incidents during the calendar year in which an injury requiring medical attention or property damage resulting in compensation occurred as a result of downed wires or other electrical system failures and all remedial action taken as a result of any injuries or property damage described.	Section II.B
<b>7826.0500 RELIABILITY REPORTING REQUIREMENTS.</b>		
	A. the utility's SAIDI for the calendar year, by work center and for its assigned service area as a whole; B. the utility's SAIFI for the calendar year, by work center and for its assigned service area as a whole; C. the utility's CAIDI for the calendar year, by work center and for its assigned service area as a whole; D. an explanation of how the utility normalize its reliability data to account for major storms	Section IV.B.1.a
	E. an action plan for remedying any failure to comply with the reliability standards set forth in part 7826.0600 or an explanation as to why noncompliance was unavoidable under the circumstances;	Section IV.B.2.a
	F. to the extent feasible, a report on each interruption of a bulk power supply facility during the calendar year, including the reasons for interruption, duration of interruption, and any remedial steps that have been taken or will be taken to prevent future interruption;	Section IV.B.3
	G. a copy of each report filed under part 7826.0700;	Section IV.B.4.a
	H. to the extent technically feasible, circuit interruption data, including identifying the worst performing circuit in each work center, stating the criteria the utility used to identify the worst performing circuit, stating the circuit's SAIDI, SAIFI, and CAIDI, explaining the reasons that the circuit's performance is in last place, and describing any operational changes the utility has made, is considering, or intends to make to improve its performance;	Section IV.B.2.b
	I. data on all known instances in which nominal electric service voltages on the utility's side of the meter did not meet the standards of the American National Standards Institute for nominal system voltages greater or less than voltage range B.	Section IV.B.5 Table 21
	J. data on staffing levels at each work center, including the number of full-time equivalent positions held by field employees responsible for responding to trouble and for the operation and maintenance of distribution lines;	Section IV.B.6
	K. Any other information the utility considers relevant in evaluating its reliability performance	
<b>7826.0600 RELIABILITY STANDARDS.</b>		
	Subpart 1. Annually proposed individual reliability standards. On or before April 1 of each year, each utility shall file proposed reliability performance standards in the form of proposed numerical values for the SAIDI, SAIFI, and CAIDI for each of its work centers. These filings shall be treated as "miscellaneous tariff filings" under the commission's rules of practice and procedure, part 7829.0100, subpart 11.	Section IV
<b>7826.0700 REPORTING MAJOR SERVICE INTERRUPTIONS.</b>		
	Subpart 1. Contemporaneous reporting. A utility shall promptly inform the commission's Consumer Affairs Office of any major service interruption. At that time, the utility shall provide the following information, to the extent known: A. the location and cause of the interruption; B. the number of customers affected; C. the expected duration of the interruption; and D. the utility's best estimate of when service will be restored, by geographical area.	Section IV.B.4.a

Requirement	Item	Location
	Subpart 2. Written report. Within 30 days, a utility shall file a written report on any major service interruption in which ten percent or more of its Minnesota customers were out of service for 24 hours or more. This report must include at least a description of: A. the steps the utility took to restore service; and B. any operational changes the utility has made, is considering, or intends to make, to prevent similar interruptions in the future or to restore service more quickly in the future.	Section IV.B.4.a
<b>7826.1200 CALL CENTER RESPONSE TIME.</b>		
	Subpart 1. Calls to business office. On an annual basis, utilities shall answer 80 percent 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.	Section III.E
	Subpart 2. Calls regarding service interruptions. On an annual basis, utilities shall answer 80 percent 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.	Section III.E
<b>7826.1400 REPORTING METER-READING PERFORMANCE.</b>		
	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	Section III.A.1
	D. data on monthly meter-reading staffing levels, by work center or geographical area	Section III.A.1
<b>7826.1500 REPORTING INVOLUNTARY DISCONNECTIONS.</b>		
	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	Section III.C
<b>7826.1600 REPORTING SERVICE EXTENSION REQUEST RESPONSE TIMES.</b>		
	The annual service quality report must include a 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; and 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.	Section III.D
<b>7826.1700 REPORTING CALL CENTER RESPONSE TIMES.</b>		



Requirement	Item	Location
	The annual service quality report must include a detailed report on call center response times, including calls to the business office and calls regarding service interruptions. The report must include a month-by-month breakdown of this information.	Section III.E
<b>7826.1800 REPORTING EMERGENCY MEDICAL ACCOUNT STATUS.</b>		
And Commission Order in Docket No. E002/M-22-162, Dated October 20, 2023.	The annual service quality report must include the number of customers who requested emergency medical account status under Minnesota Statutes, section 216B.098, subdivision 5, the number whose applications were granted, and the number whose applications were denied and the reasons for each denial.	Section III.F
<b>7826.1900 REPORTING CUSTOMER DEPOSITS.</b>		
	The annual service quality report must include the number of customers who were required to make a deposit as a condition of receiving service.	Section III.G
<b>7826.2000 REPORTING CUSTOMER COMPLAINTS.</b>		
	The annual service quality report must include a detailed report on complaints by customer class and calendar month, including at least 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; or (4) refusing to take the action the customer requested; and E. the number of complaints forwarded to the utility by the commission's Consumer Affairs Office for further investigation and action.	Section III.H
<b>COMMISSION ORDERS</b>		
Docket E002/M-23-73 December 5, 2023	6. Required Xcel to discuss how to lower the difference in SAIDI, SAIFI, and CAIDI between feeders associated with the different customer classes in their 2024 filing, including costs and benefits to implementation. This requirement ends on December 31, 2024, unless the Commission changes or extends it.	Section V.A
Docket No. E002/M-22-233 March 22, 2023	1. 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 Company's service quality reporting dockets until the variance is made permanent or terminated.	Section III.J

Requirement	Item	Location
Docket No. E002/M-22-233 March 22, 2023	<p>5. Xcel Energy shall file a report on the following evaluation metrics in its service quality reports for 2023, 2024 and 2025:</p> <p>A. Meter-related complaints for advanced metering infrastructure.</p> <p>B. The percentage of customers flagged for disconnection who pay their disconnection amount in full in the current process versus after the variance has been implemented.</p> <p>C. The number of field visits required when the Company is unable to reach the customer (speaking to the customer or leaving a voicemail).</p> <p>D. The length of time for reconnecting each customer, and the method for reconnecting the customer.</p> <p>E. Re-analysis of actual costs for disconnection/reconnection requiring in-person visits and those performed remotely.</p> <p>F. Detailed cost information and subsequent analysis of costs as opposed to the Company's proposed language stating adjustments to costs can be following the first year of reporting.</p> <p>G. Progress exploring texting capabilities for customer contact and progress on an automated process for reconnection.</p> <p>H. Progress adding a direct link on its website to submit the Medically Necessary Equipment &amp; Emergency Certification Form.</p> <p>I. Feedback from the Department of Commerce, Energy Assistance Unit regarding remote disconnection.</p> <p>J. Compliance with all consumer protection measures ordered in this proceeding.</p> <p>K. Detailed information on the number of customers opting out of AMI meter installation and demand-billed customers compared to customers with AMI meters installed.</p> <p>L. A proposal for using the capacity of its advanced metering infrastructure to restore electric service to customers during periods of extreme heat.</p>	Section III.J
Docket No. E002/M-22-233 March 22, 2023	<p>6. Within 30 days of filing its 2023, 2024, and 2025 service quality reports, Xcel Energy shall engage stakeholders to discuss the evaluation metrics requirements established in this docket.</p> <ul style="list-style-type: none"> <li>•Complaints related to AMI meters.</li> <li>•The percentage of customers flagged for disconnection who pay their disconnection amount in full under the current process, and the percentage under the new process.</li> <li>•The number of field visits required when the Company is unable to reach the customer (speaking to the customer or leaving a voicemail).</li> <li>•The length of time for reconnecting each customer, and the method for reconnecting the customer.</li> <li>•Updated calculation of the Company's costs to disconnect and reconnect a customer remotely, and the costs to disconnect and reconnect a customer in person when a site visit is required.</li> <li>•Detailed cost information and subsequent analysis of costs.</li> <li>•The Company's progress in developing the capacity to contact customers via text, and in developing an automated process for reconnection.</li> <li>•The Company's progress adding a direct link on the Company's website to submit the Medically Necessary Equipment &amp; Emergency Certification Form.</li> <li>•Feedback from the Department's Energy Assistance Unit regarding remote disconnection.</li> <li>•Compliance with all consumer protection measures ordered in this proceeding.</li> </ul>	Section III.J
Docket E,G-999/PR-22-13 Docket E002/M-22-162 January 18, 2023	<p>1. Eliminated the standalone Annual Summary of Customer Complaints docket (YY-13).</p> <p>2. Required utilities to include customer complaint data from Minn. Rules 7820.0500 in their Annual Service Quality reports with data filed as part of Minn. Rules 7826.2000.</p>	Section III.H
Docket E002/M-22-162 November 9, 2022	<p>6. Require Xcel Energy to provide, beginning with its April 1, 2023 service quality filing, an additional data set that reports discreet meters unread for 6-12 months and 12+ months, with a single meter listed in the longest appropriate category only, in Xcel Energy's reporting under MN Rules Section 7826.1400. To the extent possible, include historic data in this format as well, with the past five years being optimal.</p>	Section III.A.1; Attachment C
Docket E002/M-22-162 November 9, 2022	<p>7. Required Xcel Energy to document response duration in days, beginning from the date of initial customer contact to the date of Company reply, for inquiries, complaints, or disputes related to DERs and/or the interconnection process that are received through Xcel's call center, email, or otherwise. Information shall be shared in a .xlsx format in the Company's 2023 service quality filing and in the temporary annual report in Docket No. E-999/CI-16-521.</p>	Section III.H.4 Attachment G-2
Docket E002/M-22-162 November 9, 2022	<p>8. Required Xcel, MP, OTP to each display, either directly or via a link to a PDF file, the utility's public facing summary, as shown in Attachment A, on the utility's website placed such that the summary is available to a website user after a single click away from the home page.</p>	Section IV.A

Requirement	Item	Location
<b>DOCKET E002/M-21-237 December 2, 2021</b>	<p>2. Required Xcel, MP, OTP to provide the following new information regarding electronic utility- customer interaction beginning with the reports filed in April 2023</p> <p>Percentage Uptime to second decimal: General Website xx.xx% Payment Services xx.xx% Outage map &amp;/or Outage Info page xx.xx% Error Rate Percentage to the third decimal Payment Services* xx.xxx%</p> <p>*if more granular data is available, please break down the error rate for unexpected errors, errors outside of the customer's control (i.e. how often to online payments fail for reasons other than insufficient funds or expired payment methods), and/or some other meaningful categorization."</p> <p>3. XE, MP and OTP provide percentage uptime and error rate percentage information in their annual reports for the next three reporting cycles, to build baselines for web-based service metrics (for 2021, 2022, 2023 annual reports)</p>	Section III.I
<b>DOCKET E002/M-21-237 December 2, 2021</b>	<p>4. XE, MP and OTP continue to provide information on electronic utility-customer interaction such that baseline data are collected:</p> <p>a. Yearly total number of website visits b. Yearly total number of logins via electronic customer communication platforms; c. Yearly total number of emails or other customer service electronic communications received; and d. Categorization of email subject, and electronic customer service communications by subject, including categories for communications related to assistance programs and disconnections as part of reporting under Minn. R. 7826.1700</p>	Section III.I
<b>DOCKET E002/M-21-237 December 2, 2021</b>	6. Xcel to add in the upcoming and subsequent reports a "DER Complaint" reporting subcategory, following discussion with an input from the Complaint working group	Section III.H
<b>Docket E002/M-20-406; December 18, 2020 Order</b>	4. The Commission grants a variance to Minn. R. 7826.0500, subp.1, item G, applicable to MP, OTP and Xcel. The utilities must file a summary table that includes the information contained in the reports, similar to Att G of Xcel's filing	Section IV.B.4.a
<b>Docket E002/M-20-406; December 18, 2020 Order</b>	5. Utilities must file the reliability (SAIDI, SAIFI, CAIDI, MAIFI, normalized/non-normalized) for feeders with grid modernization investments such as Advanced Metering Infrastructure or Fault Location Isolation and Service Restoration to the historic five-year average reliability for the same feeders before grid modernization investments.	Section IV B.1.d
<b>Docket E002/M-22-162; Order Date October 20, 2023</b>	<p>2. Xcel must file the information listed below with its future SRSQ reports until such time as the Commission modifies the reporting requirem2. Xcel must file the information listed below with its future SRSQ reports until such time as the Commission modifies the reporting requirement. Xcel shall provide the following information, as a downloadable .csv or .xlsx file, by feeder, for the calendar year. Xcel may exclude feeders that meet the 15/15 aggregation standard.</p> <p>a. Reliability reporting region where the feeder is located b. The substation the feeder is on, with its full name c. The zip code in which the feeder is primarily located d. The number of customers on the feeder, including the proportion of residential to commercial and industrial e. Whether the feeder is overhead or underground f. SAIDI, SAIFI, and CAIDI, normalized (IEEE 1366 Standard) and with Major Event Days g. Number of outages, total customer outages, and total customer-minutes-out for the following situations: i. All levels, All Causes included ii. Bulk Power Supply - All causes, distribution, substation, transmission substation, and transmission line levels; iii. All levels, no "planned" cause, includes bulk power supply iv. All levels, "planned" cause only, includes bulk power supply. Xcel shall provide the following information, as a downloadable .csv or .xlsx file, by feeder, for the calendar year. Xcel may exclude feeders that meet the 15/15 aggregation standard.</p> <p>a. Reliability reporting region where the feeder is located b. The substation the feeder is on, with its full name c. The zip code in which the feeder is primarily located d. The number of customers on the feeder, including the proportion of residential to commercial and industrial e. Whether the feeder is overhead or underground f. SAIDI, SAIFI, and CAIDI, normalized (IEEE 1366 Standard) and with Major Event Days g. Number of outages, total customer outages, and total customer-minutes-out for the following situations: i. All levels, All Causes included ii. Bulk Power Supply - All causes, distribution, substation, transmission substation, and transmission line levels; iii. All levels, no "planned" cause, includes bulk power supply iv. All levels, "planned" cause only, includes bulk power supply</p>	Section IV.B.1.b

Requirement	Item	Location
Docket E002/M-22-162; Order Date October 20, 2023	2. Cont'd h. Number of outages, total customer outages, and total customer-minutes-out in the following primary outage cause categories, normalized and non-normalized i. Equipment - OH ii. Equipment - UG III. Lightning iv. Other v. Power Supply vi. Planned vii. Public viii. Unknown ix. Vegetation x. Weather - non-lightning xi. Wildlife	Section IV.B.1.b`
Docket E002/M-22-162 Order Date: October 20, 2023	4.(a) Non-normalized SAIDI, SAIIFI and CAIDI values	Section IV.B.1.b
Docket E002/M-22-162 Order Date: October 20, 2023	4.(b) SAIDI, SAIIFI, and CAIDI, MAIFI, CEMI, and CELI normalized values calculated using the 2.5 base method.	Section IV.B.1.b
Docket E002/M-22-162 Order Date: October 20, 2023	4.(c) MAIFI – normalized and non-normalized.	Section IV.C.1
Docket E002/M-22-162 Order Date: October 20, 2023	4. (e) CEMI – at normalized and non-normalized outage levels of 4, 5, and 6 interruptions.	Section IV.C.2
Docket E002/M-22-162 Order Date: October 20, 2023	4.(f) The highest number of interruptions experienced by any one customer (or feeder, if customer level is not available).	Section IV.C.2
Docket E002/M-22-162 Order Date: October 20, 2023	4.(g) CELI – at normalized and non-normalized intervals of greater than 6 hours, 12 hours, and 24 hours.	Section IV.C.3
Docket E002/M-22-162 Order Date: October 20, 2023	4.(h) The longest experienced interruption by any one customer (or feeder, if customer level is not available).	Section IV.C.3
Docket E002/M-22-162 Order Date: October 20, 2023	4.(j) A breakdown of field versus office staff as required Minn. Rules 7826.0500 Subp. 1, J, including separate information on the number of contractors for each work center.	Section IV.B.6
Docket E002/M-22-162 Order Date: October 20, 2023	4. (d) Estimated restoration time accuracy, using the following windows: a. Within -90 minutes to 0 of estimated restoration time	Section IV.B.4.b
Docket E002/M-22-162 Order Date: October 20, 2023	4.(i) Performance by customer class, If reporting by class is not yet possible, an explanation of when the utility will have this capability.	Section IV.B.1.b
Docket E002/M-22-162 Order Date: October 20, 2023	4.(k) Causes of sustained customer outages, by work center.	Section IV.B.2.a
Docket E002/M-14-131 December 12, 2014	3. Required Xcel to augment its next filing to include a description of the policies, procedures and actions that it has implemented, and plans to implement, to assure reliability, including information on how it is demonstrating pro-active management of the system as a whole, increased reliability, and active contingency planning. 4. Required Xcel to incorporate into its next filing a summary table that allows the reader to more easily assess the overall reliability of the system and identify the main factors that affect reliability.	Section IV.A Section IV.B.1.b
Docket G002/CI-08-871 Docket E, G002/M-09-224 November 30, 2010	Direct Xcel to file the following information with its annual electric service quality reports filed pursuant to Minn. Rules, Part 7826.0500 and its annual gas service quality reports established in Docket No. G-999/CI-09-409 starting in 2013: • Volume of Investigate and Remediate Field orders; • Volume of Investigate and Refer Field orders; • Volume of Remediate Upon Referral Field orders; • Average response time for each of the above categories by month and year; • Minimum days, maximum days, and standard deviations for each category; and • Volume of excluded field orders.	Section III.B
Docket E002/M-05-551 April 7, 2006	3. In its annual safety, reliability, and service quality report due on or before April 1, 2007, Xcel Energy shall report on the 25 worst performing circuits in each of its four work centers.	Section IV.B.2.b
Docket E002/M-04-511 November 3, 2004	6. Xcel shall include, on a going forward basis, data regarding credit calls but not calls from C&I customers in its calculation of call center response times	Section III.E

Requirement	Item	Location
Docket E002/GR-21-630 July 17, 2023	27(a) A 2022 Electric Rate Case requirement that “Prior to seeking future cost recovery for any incremental FLISR investments, Xcel must propose a mechanism by which to base cost recovery for FLISR investments on reliability improvements: a. Xcel must track and report, beginning in its next Service Quality, Safety, and Reliability report due April 2024, on reliability performance for circuits equipped with FLISR investments approved in the present rate case as recommended by the Department, indicating in the Company’s safety, reliability, and service quality filings which circuits have been equipped with FLISR. Allow Xcel to modify the requirements on circuit level performance reporting in its annual Service Quality, Safety, and Reliability reports to align with the Department’s recommendation.”	Section IV.A
<b>24-27 January 13, 2025 Order</b>		
Docket No. E002/M-24-27, January 13, 2025	6. Xcel’s 2024 statewide Reliability Standard is set at the IEEE benchmarking second Quartile for large utilities. Xcel’s Southeast and Northwest work center reliability standards are set at the IEEE benchmarking second quartile for medium utilities. Xcel’s Metro East and Metro West work center reliability center standards are set at the IEEE benchmarking second quartile for large utilities.	Section V.B. [2025 Standards]
Docket No. E002/M-24-27, January 13, 2025	7. Xcel must file a supplement to its 2024 safety, reliability, and service quality report 30 days after IEEE publishes the 2024 benchmarking results, with an explanation for any standards the utility did not meet.	Section V.B. [2025 Standards]
Docket No. E002/M-24-27, January 13, 2025	14. Xcel must include an analysis and summary data based on the data points below for 2024 with its next safety, reliability, and service quality report due April 1, 2025 report to better determine if there are areas for improvement in shortening service timelines. Type of new service request (based on Request Type such as Service, Extension, Relocate/Lower Facilities, etc. and Value Characteristic such as Commercial Retail, Other Building, etc.) •Date of new service request •Requested new in-service date •Date of meter installation •Date of service connection	Section VI.B.1.
Docket No. E002/M-24-27, January 13, 2025	15. Xcel must report service extension timelines by work center in future safety, reliability, and service quality reports.	Section VI.B.1.
Docket No. E002/M-24-27, January 13, 2025	16. The Commission grants Xcel’s request for a temporary extension of the variance to Minn. Rule 7820.2500 regarding AMI disconnection as approved in the Commission’s March 22, 2023, order in Docket No. E-002/M-22-233.	Section VI.B.2.
Docket No. E002/M-24-27, January 13, 2025	17. The Commission extends the variance until the Commission issues a decision on the variance request as presented in the 2024 safety, reliability, and service quality report.	Section VI.B.2.
Docket No. E002/M-24-27, January 13, 2025	18. The extended variance is retroactively effective starting from the expiration of the previous variance on April 22, 2024.	Section VI.B.2.
Docket No. E002/M-24-27, January 13, 2025	19. The Commission increases the existing threshold of final contact for disconnection by requiring Xcel to use two methods of electronic communication, including either text message or email in addition to voicemail where the Company has received customer consent to do so.	Section VI.B.3.
Docket No. E002/M-24-27, January 13, 2025	20. The Commission approves Xcel’s proposal to identify customers throughout its service territory that have not received LIHEAP assistance and are carrying past due balances and approve the Company’s proposal to perform targeted outreach to the identified customers.	Section VI.B.4.
Docket No. E002/M-24-27, January 13, 2025	21. Xcel must perform additional outreach throughout its service territory with the goal of increasing participation in affordability programs that reduce bad debt.	Section VI.B.4.
Docket No. E002/M-24-27, January 13, 2025	22. Xcel must publish its disconnection and payment agreement policies and practices on its website. Subject to technical feasibility, Xcel shall make the edits discussed in ECC/CUB’s September 12, 2024 comments to its payment agreement webpage.	Section VI.B.5.
Docket No. E002/M-24-27, January 13, 2025	23. Xcel must make a filing in the instant docket and Docket E,G-999/PR-24-02 detailing its current disconnection policies and practices, and require Xcel to submit additional filings in Docket E,G-999/PRYR-02 when there are changes to those policies and practices within 20 days of the Order.	Section VI.B.5.

Requirement	Item	Location
Docket No. E002/M-24-27, January 13, 2025	24. Xcel must propose a plan, in its 2024 safety, reliability, and service quality report due April 1, 2025, to restore power for involuntarily disconnected customers with AMI during a heat advisory or excessive heat warning, issued by the National Weather Service and to inform the Commission's consumer affairs office and customers of its plans to restore power for involuntarily disconnected customers with AMI during extreme heat events.	Section VI.B.6.
Docket No. E002/M-24-27, January 13, 2025	25. Xcel must conduct additional outreach and provide customers with information about how to request medical protections if they are particularly vulnerable to poor air quality.	Section VI.B.7.
Docket No. E002/M-24-27, January 13, 2025	26. Xcel must reduce its down payment requirements and modify its disconnection and payment agreement practices to include consideration of individual household financial circumstances. Xcel must offer the down payment percentage amounts as shown in the table above but may offer lower down payment plans as warranted by consideration of individual household circumstances.	Section VI.B.8.
Docket No. E002/M-24-27, January 13, 2025	27. Xcel must detail in its annual safety, reliability, and service quality report the average down-payment amount received from customers—both as a percentage of arrears and as a total dollar value—during CWR and non-CWR months. Xcel shall also explain how it has implemented the statutorily required consideration of both financial and extenuating circumstances during CWR and non-CWR months.	Section VI.B.9.
Docket No. E002/M-24-27, January 13, 2025	28. Xcel must not send disconnection notices until a customer's balance reaches \$180 past due.	Section VI.B.8.
Docket No. E002/M-24-27, January 13, 2025	29. Xcel must not disconnect customers with a past due balance below \$300.	Section VI.B.8.
Docket No. E002/M-24-27, January 13, 2025	30. Xcel must wait at least 10 days after sending a disconnection notice before disconnecting a customer.	Section VI.B.8.
Docket No. E002/M-24-27, January 13, 2025	31. Xcel must evaluate implementing the following policies and to file the evaluation by April 1, 2025 in its 2024 safety, reliability, and service quality report.  a.Setting the reconnection fee at \$0. The evaluation shall include an estimate of the costs of waiving reconnection fees and how the Company would propose to recover those costs. b.A proposal to increase the number of customers receiving pre-weatherization, weatherization, and energy efficiency improvements, including deep retrofits to create greater energy savings, in areas within the Company's service territory with high energy burden. The proposal should include year over year targets designed to increase the number of people receiving energy efficiency measures. c.A more robust hot-weather rule to prevent disconnections in months with the highest cooling energy burden. d.Creating an off-season LIHEAP program to help income-qualified residents clear their arrears by self-attesting to their income level.	Section VI.B.10.
Docket No. E002/M-24-27, January 13, 2025	32. Xcel must propose a plan, as part of its with its 2024 safety, reliability, and service quality report due on April 1, 2025, to restore power for involuntarily disconnected customers with AMI when high air quality index alerts have been issued.	Section VI.B.6.
Docket No. E002/M-24-27, January 13, 2025	33. Xcel must file in supplemental direct testimony to its rate case filed November 1, 2024 in Docket E002/GR-24-320 a program similar to its offering in Colorado where interest payments and fees from late bill payments are donated to low-income customer assistance programs or the elimination of late fees and interest.	Section VI.B.11.
Docket No. E002/M-24-27, January 13, 2025	34. Xcel must provide a discussion in its next safety, reliability, and service quality report on how it manages disconnections due to a landlord's failure to pay, consistent with the requirements in Minn. R. 7820.1400.	Section VI.B.12.
Docket No. E002/M-24-27, January 13, 2025	35. Xcel must inform affected personnel of racial disparities in electric service.	Section VI.B.13.
Docket No. E002/M-24-27, January 13, 2025	36. Xcel must file a compliance report with its annual safety, reliability, and service quality filing on which employees received the training and what information was provided.	Section VI.B.13.
Docket No. E002/M-24-27, January 13, 2025	37. Where not otherwise noted, Xcel must file any necessary revised tariff changes within 30 days of the date of this order.	Section VI.B.14.
Docket No. E002/M-24-27, January 13, 2025	38. Xcel must perform additional analysis as outlined in decision options below prior to developing a proposal for targeted undergrounding or enhanced vegetation management.	Section VI.B.18.

Requirement	Item	Location
Docket No. E002/M-24-27, January 13, 2025	39. Xcel must add the following data to its interactive service quality map by census block group by April 1, 2025: <ul style="list-style-type: none"> <li>•Municipal Boundaries</li> <li>•Premise counts by census block group</li> <li>•Percentage of underground electric assets</li> <li>•Percent of electric premises disconnected for 24 hours or more</li> <li>•Average age of arrears for disconnected premises</li> <li>•Per premises energy costs</li> </ul>	Section VI.B.15.
Docket No. E002/M-24-27, January 13, 2025	40. Xcel must add to its interactive service quality map the average age of homes by Census Block Group by April 1, 2025.	Section VI.B.15.
Docket No. E002/M-24-27, January 13, 2025	41. Xcel must add to its interactive service quality map the average amount of arrears for disconnected premises by April 1, 2025.	Section VI.B.15.
Docket No. E002/M-24-27, January 13, 2025	42. The Commission delegates authority to the Executive Secretary to work with Xcel and stakeholders to develop a proposal for what affordability and associated service quality data is reported in safety, reliability, and service quality report and what data continues to be reported in other dockets.	Section VI.B.16.
Docket No. E002/M-24-27, January 13, 2025	43. Xcel must conduct a study similar to the TRC Service Quality and Demographics Analysis on a three-year cycle with the next report due on April 1, 2027, with its safety, reliability, and service quality report. Xcel must use five years of data for future analyses.	Section VI.B.17.
Docket No. E002/M-24-27, January 13, 2025	44. Xcel must develop its data collected on causes of CELI-12 outages to inform which causes predominantly affect CBGs currently showing increased CELI-12. Xcel must to then analyze whether the primary causes emerging in census block groups with increased CELI-12 are caused by overhead assets.	Section VI.B.18.
Docket No. E002/M-24-27, January 13, 2025	45. Xcel must provide an analysis of distribution equipment vintages in the affected CELI-12 communities and analyze whether upgrading this equipment would be cost effective.	Section VI.B.18.
Docket No. E002/M-24-27, January 13, 2025	46. Xcel must hire an independent third-party evaluator with expertise in evaluating racial disparities to conduct a one-year study that will evaluate Xcel's practices and policies related to capital investment planning, outage restoration practices, and shutoff practices to better understand the causes of these discrepancies in shutoff rates and service reliability. Xcel must engage interested stakeholders to participate and collaborate with the independent third-party evaluator.	Section VI.B.19.

**PUBLIC DOCUMENT**  
**NOT-PUBLIC DATA HAS BEEN EXCISED**

**I. FILING REQUIREMENT**

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Annual Report on our safety, reliability, and service quality performance for 2024.

We submit this report pursuant to Minn. R. 7826.0400, 7826.0500, 7826.1300, and 7820.2500. This Annual Report also contains additional items ordered by the Commission and stemming from previous Annual Service Quality Reports, Performance Based Ratemaking (PBR), and Advanced Meter Infrastructure (AMI) related dockets. For ease of reference, we provide a compliance matrix starting on page vi detailing the various rule requirements and Order Points, along with page references to this report.

In compliance with the Rules, this report is organized into the following sections:

- I.** Filing Requirement
- II.** Safety Performance for 2024
- III.** Service Quality Performance for 2024
- IV.** Reliability Performance for 2024
- V.** Proposed Electric Reliability Standards for 2025
- VI.** January 13, 2025 Order Compliance
- VII.** Conclusion

**II. SAFETY PERFORMANCE FOR 2024**

Minn. R. 7826.0400 requires the Company to provide an Annual Safety Report on or before April 1 of each year on its safety performance during the last calendar year. The Annual Safety Report has two elements required by Minnesota Rules, addressed in subparts A and B below.

**A. REPORTS TO OSHA AND THE MINNESOTA DEPARTMENT OF LABOR & INDUSTRY**

Pursuant to Minn. R. 7826.0400, subpart A, the Company must provide “*summaries of all reports filed with the United States Occupational Safety and Health Administration and the Occupational Safety and Health Division of the Minnesota Department of Labor and Industry during the calendar year.*”



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**NOT-PUBLIC DATA HAS BEEN EXCISED**

Throughout 2024, we continued our commitment to provide our employees with a safe work environment and to promote awareness of safe work practices. As to reports filed with OSHA, each year the U.S. Department of Labor, Bureau of Labor Statistics Survey of Occupational Injuries and Illnesses requests information on randomly selected plants and facilities operated by Xcel Energy. Attachment A provides a summary of the data requested by and provided to the U.S. Department of Labor for 2024. This attachment includes the required information from OSHA Form 300A.

**B. INCIDENTS RESULTING IN COMPENSATION BECAUSE OF DOWNED WIRES  
OR OTHER ELECTRICAL SYSTEM FAILURES**

Pursuant to Minn. R. 7826.0400, subpart B, the Company must provide “[a] *description of all incidents during the calendar year in which an injury requiring medical attention or property damage resulting in compensation occurred as a result of downed wires or other electrical system failures and all remedial action taken as a result of any inquiries or property damage described.*”

The required information for 2024 is provided in Attachment B to this Annual Report. The Rule requires a description of incidents that occurred during the calendar year (i.e., 2024), but this summary also reflects payments made in 2024 for any qualifying events that occurred in a prior year. When an incident occurs from a downed wire or failed equipment, the Company takes the necessary action to replace, repair, or otherwise fix its equipment.

Total claims paid in 2024 were higher than 2023. Of the total claims paid in 2024, we note that approximately 70 percent is due to three large claims from earlier years paid in 2024.

**III. SERVICE QUALITY PERFORMANCE FOR 2024**

**A. METER READING**

Pursuant to Minn. R. 7826.1400, Subparts A-C, the Company must *provide various metrics on its 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*

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**NOT-PUBLIC DATA HAS BEEN EXCISED**

*personnel for periods of six to 12 months and periods of longer than 12 months, and an explanation as to why they have not been read.*

In addition, in the Commission's November 9, 2022 Order in Docket No. E002/M-22-162, at Order Point 6, the Commission required the Company "to provide, beginning with its April 2, 2023 service quality filing, an additional data set that reports discreet meters unread for 6-12 months and 12+ months, with a single meter listed in the longest appropriate category only, in Xcel Energy's reporting under MN Rules Section 7826.1400. To the extent possible, include historic data in this format as well, with the past five years being optimal."

We provide the required information as Attachment C. As discussed in our July 31, 2013 Reply Comments in Docket No. E002/M-13-255, Attachment C excludes multiple reads per month when reporting meter read totals so that the "Percent Read by Company" does not exceed 100 percent in any given month. We have reported the number of meters installed by month rather than only as a year-end total.

While approximately 1.1 million of our over 1.3 million customers had received an updated meter by the end of 2024, the approximately 200,000 meters remaining as of that time are known as legacy meters. The number of legacy meters continues to decline as our AMI meter installation process continues. Legacy meters continue to be read using the Cellnet Automated Meter Reading (AMR) service, which means that the customers' usage data is transmitted to the Company through the Cellnet system. Provided the Cellnet system functions as intended, Company or contractor field personnel do not need to read or visit meters to bill customers. However, when the Company does not receive an automatic reading from a legacy customer meter for two consecutive months, we then dispatch field personnel to visit the customer's premises to gather the necessary usage information for billing purposes. While at the customer premises, field personnel will attempt to obtain a meter reading. If they are unable to obtain a reading, field personnel will submit a code in their hand-held device to document the reason and trigger a work order as necessary.

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If the problem is on the customer side or within the customer's control – such as access issues or a meter has been turned off – field personnel input a customer-related skip code such as no one home, need a key, locked gate, meter locked, etc. These codes are submitted to the AMR system, which sends an automatic letter to the customer to contact the Company. If an actual meter read or skip code is not entered into the AMR system, it automatically generates a “No Read Returned” code. In other words, the data listed for each month provides the number of actual attempts to read meters, with a reason why this was not successful or “skip code” and the number of meters we did not attempt to read at all as “No Read Returned.” Accordingly, for each month, the tables list the unique number of meters, but the same meter may appear in a table for several months.

Typically, “No Read Returned” entries are related to situations where we are unsuccessful in getting a manual reading in previous months due to customer-controlled issues and moved our focus and resources to meters that we either had not attempted to read previously or knew that we would have access to.

As mentioned above, when we are unable to manually read a meter that is not transmitting usage data, the AMR system sends a letter to the customer asking them to contact the Company. The letter is sent each month we attempt to read the meter. After six months of no read, we will initiate additional methods to contact the customer through phone calls and email. We may also employ alternative avenues to locate property owners, such as asking neighbors or tenants, or searching available public records like property taxes. The Company is allowed to disconnect the customer after a meter goes unread for 18 months due to access issues, following appropriate notices, although we seldom use this option because these customers are typically continuing to pay their estimated bills. If meters are not energized, we will remove them with customer permission, which stops the automated AMR read requests.

The full deployment of AMI is planned to be substantially complete by the end of 2025.<sup>1</sup> With AMI, our meter reading process changes slightly, with meters being read every four hours. The reads contain 16 data points for every 15-minute interval. When AMI meters are not communicating, we classify their status as unreachable. The Company conducts routine internal reporting every two weeks to locate unreachable meters and generate maintenance orders. Any maintenance orders result in meter field personnel investigating the unreachable meters.

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<sup>1</sup> As noted in our November 1, 2024 filing in Docket No. E002/ M-24-371, there is a small proportion of customers that will not have an AMI meter installed by the end of mass deployment in 2025. These

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The number of meters that go unread fluctuates annually and depends on how successful we have been when reaching out to customers, how responsive customers have been to our efforts to communicate with them, and how successful we have been at solving access and other customer-related issues.

Additional frequently used skip codes that apply to both AMR and AMI meters include:

- *Meter Off*: The meter is turned off, for example, because on the customer side the breaker is turned off.
- *Non-energized*: During new construction or after re-model, the premise has not yet been energized.
- *Dead Register*: Meter is not working and needs to be replaced (generates a work order).
- *Meter Removed*: Meter is removed in the field but still shows in the Meter Reading system.
- *No Answer*: No access to premises.
- *Service Cut at Pole*: Service disconnected either for non-payment or security.
- *OC Meter Maintenance*: Meter communication malfunction (generates a work order).

As the Company fully 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 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.

Pursuant to Minn. R. 7826.1400, Subpart D, the Company must *provide various metrics on its meter-reading performance, including for each customer class and for each calendar month: "Data on monthly meter reading staffing levels by work center or geographical area."*

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customers have meters with 'KYZ' contacts, which provide energy pulses or load control signals for energy management purposes.

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Table 1 includes 2024 data on monthly meter reading staffing levels by work center or geographical area. The Table shows part-time and full-time equivalent numbers and does not count temporary staff positions. The “Other” category includes Xcel Energy personnel located in our Sioux Falls Service Center who are responsible for reading meters in western Minnesota and South Dakota. Additionally, we now have staff based out of our Grand Forks and Fargo service centers that perform work in Minnesota.

**Table 1**  
**2024 Meter Reading Staff Levels**

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Metro East	7	7	9	9	9	9	9	9	9	9	9	10
Metro West	7	7	7	7	7	8	8	7	7	7	8	8
Northwest	4	3	3	4	4	4	4	4	4	4	4	4
Southeast	4	4	3	4	4	4	4	4	4	4	4	4
Other	5	5	5	5	5	5	5	5	5	5	5	5

In 2023, meter reading staff were combined with field representative staff, creating a larger “universal team” with responsibilities that include electric and gas manual meter reads, verification of vacant properties, field collections, field disconnection of gas and electric meters and reconnection of electric meters. The Company believes the shift to a larger cross-trained team will provide a more efficient use of employee resources stationed at our regional work centers, particularly through this transitional period. Our legacy meter reading group was fully staffed in all work centers at the end of 2023 within the new universal team structure.

A customer may opt-out of receiving an AMI meter at any time. Those customers then receive a non-communicating opt-out meter that, while it provides advanced capabilities, is not equipped with communication and requires the meter to be manually read. The Company is finding that opt-out meters take longer to be manually read than first anticipated. First, these meters provide interval data and require a manual probe to collect the data. This can take up to three times as long as reading a legacy AMR meter. Second, unlike our legacy meters, opt-out meter placement is random throughout our service area, requiring more time driving from meter to meter. Once full AMI deployment is complete, we will likely gain some efficiency by optimizing our manual meter route.

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**B. METER EQUIPMENT MALFUNCTIONS**

In the Commission's November 30, 2010 Order in Docket Nos. G002/CI-08-871 and E,G002/M-09-224, at Order Point 2, the Commission directed the Company *to file the following information with its annual electric service quality reports filed pursuant to Minn. Rules, Part 7826.0500:*

- *Volume of Investigate and Remediate Field orders;*
- *Volume of Investigate and Refer Field orders;*
- *Volume of Remediate Upon Referral Field orders;*
- *Average response time for each of the above categories by month and year;*
- *Minimum days, maximum days, and standard deviations for each category; and*
- *Volume of excluded field orders.*

In 2024, 95 percent of electric orders the Company performed were within the field response parameters prescribed in our tariff, completing a total of 1,838 orders with an average response time of 8.7 days. We additionally completed 232 electric orders for which we experienced access and/or environmental issues, both allowable Exclusions under the tariff. We provided our detailed results in Attachment D.

In 2024, the Company had five electric meter Remediate Upon Referral work orders that were completed outside the one-day maximum. All five were created incorrectly and should have been created as Investigate and Remediate, and were completed within the time allotted for the Investigate and Remediate category. Necessary communications have been implemented to prevent this type of situation going forward.

Total electric meter malfunction order count decreased when comparing 2024 to 2023. Similar to 2023, the average and max number of days for electric investigate orders increased in 2024 due to constraints around meter inventory and availability. As we transition to AMI meters, our available inventory of legacy AMR meters has been difficult to maintain. Our AMR vendor experienced supply chain issues related to the communication module and at that time, we were receiving very limited new shipments. This supply chain issue required us to refurbish AMR meters from customers that have been removed for AMI meter installations. We expect this metric to continue to improve as more customers receive AMI meters.

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**C. INVOLUNTARY DISCONNECTIONS**

Pursuant to Minn. R. 7826.1500, Subparts A through D, the Company must *provide various metrics related to 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 chapter 7820 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.*
- D. The number of disconnected customers restored to service by entering into a payment plan.*

Attachment E provides the information required in Minn. Rule 7826.1500 outlined above. In 2024, the Company saw a decrease in the number of customers who received disconnection notices and the number of customers who sought cold weather rule protection, and increases in the remaining metrics. Past due balances were lower than in 2023, leading to a lower number of disconnection notices and customers seeking cold weather rule protection. However, overall disconnections increased relative to 2023. In 2024, the results of past and current economic challenges, coupled with higher arrears balances and a continued return to more normal credit activity, led to a higher number of customers experiencing a disconnection or struggling to enter into a payment arrangement. We also note, however, that the total number of customers restored to service within 24 hours, and the total number of customers restored to service through pay arrangements, increased in 2024 relative to 2023. So, although more customers were disconnected than in 2023, more were also restored to service, quickly.

In response to disconnections in 2025, the Company has lowered required down payment percentages and made other modifications to our Minnesota disconnections policy in Docket No. E002/M-24-27. Those changes took effect in 2025, may lead to fewer disconnections and more customers entering into payment arrangements in 2025 and beyond. The purpose for updated pay arrangement guidelines is to create a structure where customers can receive assistance in avoiding disconnection, while setting up the framework that helps bring their past due balance down in a manageable but meaningful way. It remains possible that allowing customers to set arrangements for lower down payments may lead to higher arrears balances and a higher number of broken payment arrangements. The Company will continue to

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monitor these metrics closely.

Additionally, as mentioned in our 2023 Electric Service Reliability Service Quality filing, there is potential for increased disconnections with the use of AMI technology. Prior to AMI, resource and time constraints meant that the Company was disconnecting only about six percent of customers eligible for disconnection. The change in customers experiencing a disconnection in 2024 reflects the Company's ability to reach more of our customers who are not engaging to resolve payment or arrears issues. The Company has worked closely with stakeholders to find consensus around a number of meaningful changes to credit policies including additional community-based organization outreach, a higher disconnection threshold of \$300 past due, lower payment plan down payments, a longer notice period prior to disconnection, paying down arrears of the customers with the largest past-due balances, and more visibility into our processes.<sup>2</sup> The Company is also committed to continuing constructive dialogue with stakeholders going forward.

**D. SERVICE EXTENSION RESPONSE TIMES**

Pursuant to Minn. R. 7826.1600, Subparts A and B, the Company must *provide a 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 services 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.*

Tables 2A and 2B provide information in accordance with Part A of Minn. R. 7826.1600 and include data on service installations that required construction. Tables 2C and 2D provide information in accordance with Part B of Minn. R. 7826.1600 and include data on start service reconnection requests.

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<sup>2</sup> These changes are further discussed in Part III and are summarized in the "Minnesota Disconnection Process" document filed in Docket Nos. E002/M-24-27 and E,G002/PR-24-02, and posted to the Xcel Energy website at <https://mn.my.xcelenergy.com/s/billing-payment/energy-assistance/pay-arrangements> and <https://mn.my.xcelenergy.com/s/billing-payment/manage-bill>.



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**Table 2A**  
**2024 New Electric Service Extension Installations - Residential**

<b>Electric</b>													
Residential	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total 2024
# of Installations	593	541	469	508	573	507	583	535	757	756	636	408	6,966
Average days to complete from customer to site ready	49.61	21.6	36.84	19.83	30.1	26.93	27.09	25.9	28.31	34.72	32.7	17.94	29.66

**Table 2B**  
**2024 New Electric Service Extension Installations - Commercial**

<b>Electric</b>													
Commercial	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total 2024
# of Installations	62	55	48	59	76	83	114	85	97	128	116	139	1,062
Average days to complete from customer to site ready	20.03	17.42	20.27	23.77	18.32	19.46	24.27	36.39	26.8	43.38	24.49	36.22	31.1

**Table 2C**  
**2024 Start Service Reconnection Requests - Residential**

<b>Electric</b>													
Residential	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total 2024
# of Reconnections	386	338	333	453	3,343	2,060	2,389	3,189	2,861	1,226	745	504	17,827
Average days to complete	0.6	0.4	0.6	0.5	0.2	0.2	0.1	0.2	0.1	0.2	0.2	0.2	0.2

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**Table 2D**  
**2024 Start Service Reconnection Requests - Commercial**

<b>Electric</b>													
Commercial	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total 2024
# of Reconnections	12	14	21	27	81	34	56	53	63	59	37	27	484
Average days to complete	6.4	2.5	2.2	1.5	0.2	0.8	0.9	0.6	0.6	0.8	1.3	1.2	1.0

The total number of residential new services increased slightly in 2024 compared to 2023 while commercial services declined. Though the average days to complete new service requests increased compared to 2023 and the volume of service requests was not unexpected, there are still significant pressures in terms of material supply chains and inflation. We have worked to mitigate supply chain risks as much as possible, including by increasing our portfolio of suppliers. Service installation time can vary and is dependent on several factors such as weather impacts, significant storm events, complexity of the work, and job site readiness.

In reviewing the 2024 new electric service extension data, we found that the increase in average days to complete a service extension can be attributed to one of two factors:

1. Ongoing supply chain challenges with 34.5 kilovolt (kV) distribution voltage equipment
2. Data management inaccuracies, with some work centers not correctly updating the in-service date to reflect when a site is actually ready to accept service or when work has been completed.

The primary locations identified with an extended lead time are within our Northwest Region (Monticello and St. Cloud), along with our Maple Grove service territory. The date of new service request is correlated with the application date. The requested new in-service date reflects when the site is deemed ready to accept service. The date of meter installation and the service connection date are generally correlated for services, but depending on the voltage and area, may require different workgroups to execute, or inspections be completed prior to energization. The date of service connection is inclusive of completion of the meter installation.

Regarding the first contributing factor, the use of 34.5 kV is more prevalent in the Northwest part of our service territory, and our suppliers were impacted disproportionately by supply chain constraints in recent years due to the volume of

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these units produced. A new supplier was brought on in first quarter, 2024 and has since provided increased stability and production of these specific units.

The second contributing factor is data management variances with employees coordinating work within these specific areas. In-service dates are sometimes initially entered as the date of application for new service, but that does not always mean a site is ready to accept service; once the date of readiness to accept service is known, the in-service date should be updated. One work group had not been updating in-service dates in our work management program in 2024, leading to artificially inflated timelines to execute in that work group (i.e., days counted when the site was not yet ready to accept service). This was identified during review of Docket: E002/M-24-27 in September 2024, and we have since provided additional training and corrected the issue moving forward. Another data management issue is associated with when our contract partners complete in-service work orders associated with developments with multiple premises and accurately reflecting the field completion date in our work management systems. Additional training and process clarifications will be completed to mitigate moving forward.

When excluding these three service centers (roughly 27 percent of the total volume), the average days for a residential service extension is reduced to 15 days.

**E. CALL CENTER RESPONSE TIMES**

Pursuant to Minn. R. 7826.1700, the Company must provide *“a detailed report on call center response times, including calls to the business office and calls regarding service interruptions. The report must include a month-by-month breakdown of this information.”*

In addition, in the Commission’s November 3, 2004 Order in Docket No. E002/M-04-511, at Order Point 6, the Commission required the Company to *“include on a going forward basis, data regarding credit calls . . . in its calculation of call center response times.”*

The required month-by-month call center response data can be found in Attachment F.<sup>3</sup> This includes details on the call types handled by our residential call center representatives, Business Solutions Center (BSC), Credit and Personal Account Representatives (PAR) and our Interactive Voice Response (IVR), along with performance information. Table 3 below provides a summary of our 2024 call center response time performance.

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<sup>3</sup> Given the requirement from Docket No. E-002/M-21-814, Order Point 10 that the Company report calls to the “meter installation vendor regarding meter installation,” the data in Attachment F includes call center response data for that vendor, which makes up 0.37% of total call volume.

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As required by the Commission, we have included calls from customers with past due balances in our reported call center response time. We also provide as a comparison all service level calls offered to agents, which includes Residential, BSC, Credit, PAR, and IVR.

In addition, Line 23 on Attachment F provides our average speed of answer (ASA) and subsequent rows break out the ASA by call center.

Minn. R. 7826.1200, subp. 1 requires that the Company *answer 80 percent of calls made to the business office during regular business hours within 20 seconds*. This requirement is also reflected in our Quality of Service Plan (QSP) tariff threshold for Telephone Response Time, which dictates that 80 percent of calls must be answered within 20 seconds. Actual performance on this QSP metric in 2024 was 79.7 percent of calls answered within 20 seconds. We expect to incur a \$1 million under performance penalty for this metric. The Company will submit its proposal for how to utilize the under performance penalty in its QSP tariff annual report filed May 1, 2025.

Staffing challenges and severe weather events were the main drivers of the lower Telephone Response Time performance in 2024. Staffing issues were largely caused by a challenging hiring market and recruiting efforts falling short, resulting in new hire classes that were not as full as we were targeting. As short staffing occurred, the remaining agents became busier, resulting in longer calls and higher attrition levels. This compounded the staffing shortages throughout the year. In addition to the staffing challenges, severe weather events in July and August contributed to higher call volumes and lower performance during those months. Late in 2024 we began to increase our staffing levels to improve our ability to meet the QSP Telephone Response Time metric in 2025.

**Table 3**  
**2024 Call Center Response Time Summary**

<b>Calls Included</b>	<b>2024 Performance</b>	<b>Reference to Att F</b>
Residential, BSC, Credit, PAR, all calls handled by IVR	79.7% in 20 seconds or less	Line 20
Residential, BSC, Credit, PAR, all IVR handled outage calls	50.7% in 20 seconds or less	Line 21

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**F. EMERGENCY MEDICAL ACCOUNT**

Pursuant to Minn. R. 7826.1800, the Company must provide *“the number of customers who requested emergency medical account status under Minnesota Statutes, section 216B.098, subdivision 5, the number whose applications were granted, and the number whose applications were denied and the reasons for each denial.”*

In the Commission’s Order dated October 20, 2023, under Docket No. E002/M-22-162, the Company was required to *continue to report on its Emergency Medical Account as required under Minn. Rule 7826.1800.*

When customers contact the Company indicating that they have medical or life sustaining equipment, they are transferred directly to our Personal Accounts Department for assistance. A PAR will then send the customer a medical form, or alternately the customer can download it directly from our website.<sup>4</sup> Once the form is completed and signed by a qualified medical professional, it is returned to the Company for review and further account implementation. The form requires a qualified medical professional to certify the customer’s need for medical or life sustaining equipment, and must be returned to the Company within 30 days of medical certification. When the Company receives the certification, the PAR team updates the customer’s account with the emergency medical account flag, which means that the customer’s account cannot be disconnected for missed or late payments, and the form is filed within our system. If there is an active disconnection scheduled on the account when the completed form is received, the PAR team cancels the disconnection action on the customer account. Renewal of the medical certification is required each year. Thirty days prior to expiration of the form, our billing system automatically sends a new form to the customer for certification by an appropriate medical provider. As of the most recent review, there are 2,135 Minnesota households with an emergency medical account status in the Company’s records.<sup>5</sup>

Table 4 provides the number of 2024 monthly requests for emergency medical account status and the number of requests denied for residential customers. A customer may be denied emergency medical account status because they did not return the form to the Company, or their medical professional refused to certify the customer’s need for medical or life support. Each time the customer submits a form with incorrect and/or missing information, or it is not completed by a medical

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<sup>4</sup> [Medically Necessary Equipment & Emergency Certification Form.pdf](#)

<sup>5</sup> Application forms for customers who wish to notify the Company they have medical or life sustaining equipment are also available on our website <https://mn.my.xcelenergy.com/s/billing-payment/energy-assistance/medical-affordability-program>.

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professional, the application is denied and returned to the customer. We continue to work with the customer on the elements within our control to try and resolve outstanding application issues.

**Table 4**  
**2024 Monthly Emergency Medical Account Status**

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Requested	213	123	87	103	257	228	234	282	198	137	140	496	2,501
Denied	36	29	17	20	20	33	42	58	60	35	43	95	488

The Company works to ensure that customers who are eligible for emergency medical account status are aware of the program and enroll in it. To that end, the Company conducts outreach within our service territory to provide information on the statutory protection available to customers with medically necessary equipment. Throughout 2024, we sent approximately 0.5 million outreach items including emails, onserts, automated calls, and manual dials to customers informing them about energy assistance and affordability programs available, including the Company’s Medical Affordability Program (“MAP”). In September 2024, Xcel Energy delivered a mass notification through bill statements to all residential customers in Minnesota educating them about medical protections and programs available to them. In addition to these mailings, our outreach strategies have included directly contacting eligible customers to ensure awareness of available programs; ensuring information is easily accessible and understandable on xcelenergy.com; and equipping our customer care agents and employees with key messages to assist our customers and stakeholders in assistance conversations.

Additionally, the Company has made contact with the Minnesota Medical Association to further socialize our available medical program information and ensure a wider network of medical professionals are educated on this designation and the protections it provides to potential patients.

## **G. CUSTOMER DEPOSITS**

Pursuant to Minn. R. 7826.1900, the Company is required to report on *“the number of customers who were required to make a deposit as a condition of receiving service.”*

During 2024, we requested a total of 436 deposits as a condition of service for our residential customers that had filed for bankruptcy. We requested these deposits upon notification from the bankruptcy court and/or the customer of their bankruptcy petition.

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**H. CUSTOMER COMPLAINTS**

**1. Summary Report**

Pursuant to Minn. R. 7820.0500, the Company is required to provide an annual report *on the total numbers of resolved and unresolved complaints by class of service and type of complaint.* Item C of that rule also requires:

*The names, addresses, and telephone numbers of personnel designated and authorized to receive and respond to the requests and directives of the Public Utilities Commission regarding customer inquiries, service requests, and complaints.*

In addition, pursuant to Minn. R. 7826.2000, the Company's annual service quality report must include a detailed report *on complaints by customer class and calendar month, including at least 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 reasonable 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.*

Finally, in the Commission's January 18, 2023 Order in Docket No. E-002/M-22-162, at Order Points 1 and 2, the Commission *eliminated the standalone Annual Summary of Customer Complaints docket and ordered each utility to include customer complaint data from Minnesota Rules 7820.0500 in their Annual Service Quality reports with data filed as part of*

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*Minnesota Rules 7826.2000.*

Consistent with the requirements of the Rules set forth above, we provide the required information as Attachment G to this Annual Report, which includes complaints that are handled by the Call Center and the Company's Customer Advocate Group.

Pages 1 through 4 of Attachment G contain information on customer complaints handled by our Customer Advocates. Attachment G, page 5, provides the number of complaints forwarded to the Company by the Commission's Consumer Affairs Office (CAO) for further investigation.

Attachment G pages 6 through 18 contain information on complaints handled within the Call Centers.

Across both 2023 and 2024, the most common complaint type surrounded accounts which had received a disconnection warning or were subsequently disconnected following a disconnection warning. The increase in this category for the year 2024 is attributed to economic conditions such as inflation which impacted food, housing and transportation costs, leading to a greater number of customers being eligible for disconnection and being disconnected. Modification of our down payment percentages, beginning in 2025, should positively impact credit-related complaints throughout 2025 and beyond.

The Company exceeded its Customer Complaint threshold for 2024 by receiving 1,468 total complaints forwarded to the Company by the CAO for further investigation and action, relative to a 2024 threshold of 383 such complaints in the Quality of Service Plan (QSP) tariff, and has incurred a \$1 million under performance penalty. The Company will submit its proposal for how to utilize the under performance penalty in its QSP tariff annual report filed May 1, 2025.

## **2. Reporting Categories**

In the Commission's December 18, 2020 Order in Docket No. E- 002/M-20-406, at Order Point 16, the Commission ordered that *after consultation with Department and Commission staff, each utility must file revised categories for reporting complaint data. The Commission hereby delegates authority to the Executive Secretary to approve additional reporting categories, with the goal of establish them by the April 1, 2021 reporting deadline.*

In the Commission's December 2, 2021 Order in Docket No. E- 002/M-21-237, at Order Point 6, the Commission required Xcel Energy *to add in the upcoming and*



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*subsequent reports a “DER Complaint” reporting subcategory, following discussion with and input from the Complaint working group.”*

Table 5 below includes DER complaint categories and their total count in 2024. Through our Personal Account Representative team, we track complaints received from all the Minnesota Renewable Choice Programs (Solar\*Rewards Community, Solar\*Rewards, and Distributed Generation or standard Interconnection) through the CAO and the Minnesota Office of Attorney General.

**Table 5**  
**2024 DER Complaint Count Summary**

<b>Complaint Category</b>	<b>Complaint Count</b>
Billing	39
Interconnection	19
Other	8
Total Complaints	66

**I. ELECTRONIC CUSTOMER CONTACTS**

In the Commission’s December 2, 2021 Order in Docket No. E002/M-21-237, at Order Point 2, 3, and 4, the Commission required the Company *to provide the following new information regarding electronic utility-customer interaction beginning with the reports filed in April 2023:*

*2. Required the Company to provide:*

- *Percentage Uptime to the second decimal*
  - *General Website*
  - *Payment Services*
  - *Outage map and/ or Outage Info Page*
- *Error Rate Percentage to the third decimal*
  - *Payment Services*

*3. Required the Company to provide percentage uptime and error rate percentage information in their annual reports for the next three reporting cycles [2023-2025] to build baselines for web-based service metrics.*

*4. Required the Company to continue to provide information on electronic utility-customer interaction such that baseline data are collected:*

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

Regarding Order Points 2 and 3, Table 6 illustrates our 2020-2024 percentage uptime for our general website, payment services, and outage map/outage page as well as the error rate percentage for payment services.

**Table 6**  
**2020 – 2024 Percentage Uptime**

Percentage Uptime		2020	2021	2022	2023	2024
	General Website	100.00%	99.99%	99.98%	99.94%	100.00%
	Payment Services	99.91%	99.22%	99.56%	99.76%	99.45%
	Outage map and/or Outage Info Page	100.00%	99.99%	99.98%	99.94%	100.00%
Error Rate Percentage	Payment Services	0.115%	0.129%	0.142%	0.135%	0.116%

Regarding Order Point 4, the Company has consistently demonstrated our commitment to quality and reliable service to our customers, and as part of that process, we have continuously optimized the channels in which we interact with our customers. Below we provide an overview of these channels.

- **Email and Other Electronic Customer Communications Received:** The Company's PAR Team works with Community Action Agencies through a live portal to help enroll our customers in the Low Income Home Energy Assistance Program (LIHEAP). The Medical Electric Affordability Program receives incoming applications from customers via email and U.S. Mail. For purposes of this tracking, we have counted each application as an electronic communication because most applications require additional correspondence with customers during the application process; we do not track every customer interaction for reporting purposes. As discussed in our 2022 annual report, the Company discontinued using email as a communication channel in June, 2022 due to customer dissatisfaction. Instead, we continue to work with customers

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through our call center and our self-service options like My Account and the IVR.

- **Mobile App and My Account:** Both platforms require authentication and customer activity is trackable. Customers can pay their bill, monitor energy usage, receive notifications, contact Xcel Energy via telephone call or IVR, and perform many other services. Customers can contact us in our mobile application or via a link to a simpler version of our online “Contact Us” form.
- **Social Media:** The Company’s Correspondence Team also manages customer contacts received via various social media channels such as Facebook and Twitter, which are considered “Impressions.” These are platforms where people can view various postings directly from Xcel Energy or from other businesses or individuals and does not require authentication. Impressions can be tracked from Facebook and Twitter.
- **In-Person Events:** The Company regularly attends community events throughout our Minnesota service territory and attended 18 such events in 2024. These events assist customers who may have questions about their bill, wish to set up a payment arrangement or need help filling out an application for energy assistance.

Table 7 provides a summary of the data required in Order Point 4.

**Table 7**  
**2024 Electronic Access**

Website Visits	Facebook, Twitter, XcelEnergy.com	11,890,711
Logins via electronic customer communication platforms	My Account, Mobile App	13,585,218
Emails or other customer service electronic communications received	Emergency Medical Account LIHEAP	104,006

**J. AMI DISCONNECT/RECONNECT REPORTING**

Minn. Rule 7820.2500 requires that

*Service may be disconnected only in conjunction with a personal visit by a representative of the utility to the address where the service is rendered and an attempt to make personal contact with the customer at the address. If the address is a building containing two or more dwelling units, the representative shall make a personal visit to the door of the customer's dwelling unit within the building. If security provisions in*

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*the building preclude free access on the part of the representative, the representative shall attempt to gain access to the building from the caretaker, for the purpose of attempting to make personal contact with the customer. The representative of the utility shall at all times be capable of receiving payment, if nonpayment is the cause of the disconnection of service, or the representative shall be able to certify that the cause of disconnection has been remedied by the customer.*

The deployment of AMI provides the Company with the ability to remotely manage customer disconnections and reconnections. As we stated in our original Variance Request Petition, filed May 20, 2020:

*two-way communication capabilities between the Company and our customers are one of the valuable benefits of the AMI meters, as it can eliminate or reduce the need to physically visit each meter to collect information or to perform software updates, for example. The AMI meters also contain an internal service switch that we can operate using the two-way communications capabilities that negates the need to make a physical field visit to perform a service reconnection or disconnection; instead, we will be able to perform these remotely. Leveraging these capabilities was part of the benefits we contemplated and outlined in our certification and cost recovery requests for AMI and our Field Area Network (FAN).<sup>6</sup>*

In its March 22, 2023 Order in Docket No E002/M-22-233, the Commission approved 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. Order Point 1 stated: “*The variance may commence within 30 days and shall be reevaluated annually in the Company’s service quality reporting dockets until the variance is made permanent or terminated.*”

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<sup>6</sup> See Docket Nos. E002/M-19-666 and E002/M-20-814.

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With Order Points 17 and 18 from the January 13, 2025 Order in Docket No. E002/M-24-27, the Commission retroactively extended the variance starting from the expiration of the previous variance on April 22, 2024, and extended the variance until the Commission issues a decision with the present report. As further discussed in Part III, Section B.2. of this Report, the Company expects to request this variance indefinitely.

The Commission's March 22, 2023 Order, Order Point 5 subparts A through L require the Company to *file a report on the following evaluation metrics in its service quality reports for 2023, 2024, and 2025.*

A. Meter-related complaints for advanced metering infrastructure.

The Company received 16 meter complaints related to AMI Opt-Out in 2024. None of the 16 complaints were related to customer concerns of disconnection or credit-related activity.

B. The percentage of customers flagged for disconnection who pay their disconnection amount in full in the current process versus after the variance has been implemented.

Following Commission approval of our variance request, the Company implemented our new process beginning May 1, 2023. As shown in Table 8, throughout 2024, a total of 375,049 customers were eligible for disconnection (i.e., the due date of their disconnection notice was past). Some customers may have been eligible for disconnection multiple times in 2024, so the total number of disconnections provided in the table includes these multiple disconnections. In 2024, a total of 2,757 customers eligible for disconnection paid their account in full or a total of 0.7 percent of customers.

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**Table 8**  
**Total 2024 Eligible Customer Disconnections**

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
<b>Customers Flagged for Disconnection</b>	36,363	27,310	35,717	40,010	45,146	35,902	32,102	34,118	25,785	22,547	19,895	20,154	375,049
<b>Paid in Full</b>	130	142	213	377	450	332	260	211	203	204	147	88	2,757

- C. The number of field visits required when the Company is unable to reach customers (speaking to the customer or leaving a voicemail)

In 2024, a total of 47,658 AMI disconnection orders were placed. This means an account was eligible for remote disconnection. This total is based on eligible disconnections, not on actual accounts disconnected. Therefore, if an account was eligible for disconnection more than one time in the calendar year, each eligible disconnection counts toward the total. Of the total of 47,658 disconnection orders placed, we were able to make a final contact via a phone call or voicemail with the customer 93 percent of the time, or a total of 44,349 contacts. The Company was unable to reach the customer through a final call or voicemail seven percent of the time, or a total of 3,309 contacts.

In instances where no phone contact was made, eligible accounts were placed in a queue to be manually disconnected. Accounts in this disconnection queue are given priority based upon dollar value. If the account where no phone contact was made has a remote capable meter, a field employee attempts to make contact at the door before remotely disconnecting the meter, to allow for a faster reconnection.

When an Xcel Energy customer becomes past due on their account, we begin a nine-week process to contact the customer via multiple channels, informing them of their account status. These channels include: phone calls, emails, U.S. Mail, a past due notice on their bill(s), and potentially a door knock. Our AMI remote disconnect/reconnect process requires that in lieu of the field visit, we establish successful contact with the customer via an additional call or voicemail, and per Order Point 19 in the Commission's January 13, 2025 Order in Docket No. E002/M-24-27, the Company must attempt to contact a customer via an additional electronic method, if permission from the customer has been received. If we cannot establish this contact, the Company is required to perform a field visit prior to disconnection.

- D. The length of time for reconnecting each customer, and the method for reconnecting the customer.

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Table 9 illustrates 2024 remote and manual customer reconnection times.

**Table 9**  
**CUSTOMER RECONNECTION TIMES**

<b>RCD - Reconnection</b>				
<b>2024</b>	<b>Total</b>	<b>Avg Hrs.</b>	<b>Shortest</b>	<b>Longest</b>
All	42,221	0.51	0.00	829.11
Residential	41,996	0.46	0.00	829.11
Commercial	225	0.49	0.02	120.26

  

<b>Manual - Reconnection</b>				
<b>2024</b>	<b>Total</b>	<b>Avg Hrs.</b>	<b>Shortest</b>	<b>Longest</b>
All	1,185	48.99	0.84	2,522.24
Residential	1,024	49.99	0.84	2,522.24
Commercial	159	42.47	1.27	434.73
Other	2	56.53	22.28	90.78

E. Re-analysis of actual costs for disconnection/reconnection requiring in-person visits and those performed remotely.

Table 10 below provides a re-analysis of costs for disconnection and/or reconnection requiring in-person visits and those performed remotely. The current costs are based on 2024 disconnection and reconnection cost data.<sup>7</sup>

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<sup>7</sup> The 2022 costs were based on 2019 cost data when all disconnects and reconnects were performed with in-person visits and a higher concentration of in-person visits were performed in the Twin Cities metro area.

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**Table 10**  
**AVERAGE COST PER DISCONNECT/RECONNECT**

	Remote Disconnect/Reconnect			Physical Disconnect/Reconnect		
	2022 Costs <sup>8</sup>	2023 Costs	Current Costs	2022 Costs	2023 Costs	Current Costs
Pre Lock Call Cost	\$0.53	\$0.56	\$0.57	\$0.53	\$0.56	\$0.57
Post Lock Call Cost	\$3.74	\$3.95	\$4.07	\$3.74	\$3.95	\$4.07
Field Personnel Costs - Disconnects	\$8.46	\$14.76	\$13.59	\$59.75	\$104.28	\$96.05
Field Personnel Costs - Reconnects	\$1.08	\$1.88	\$1.73	\$35.85	\$62.57	\$57.63
Total Cost	\$13.80	\$21.15	\$19.96	\$99.87	\$171.36	\$158.31

\*All costs include labor and benefits

F. Detailed cost information and subsequent analysis of costs as opposed to the Company's proposed language stating adjustments to costs can be following the first year of reporting.

We provide in Attachment H the supporting detailed cost models for both Remote and Physical Disconnect/Reconnect costs reported in Table 10.

G. Progress exploring texting capabilities for customer contact and progress on an automated process for reconnection.

The Company is working on an option that would allow customers the ability to text for reconnection but a firm plan and delivery date have yet to be determined. The Company has recently implemented a process whereby customers who first make payments via Kubra, our third-party vendor that processes credit card payments, or at a Pay Station can now request a service reconnection through our IVR.

H. Progress adding a direct link on its website to submit the Medically Necessary Equipment & Emergency Certification form.

Work has been undertaken to assess the feasibility and cost of a direct-submit option

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<sup>8</sup> 2022 Costs as filed in Docket 22-233 - COMPLIANCE FILING MN REMOTE DISCONNECT/RECONNECT.



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for our Medically Necessary Equipment & Emergency Certification form. However, due to the complexity surrounding the number of areas on the Company's website that this form touches, it has been determined that there is not a current option to complete this work at a reasonable cost. While our current website platform does not provide a "direct submit" option, the form itself is available on our website for customers and can now be emailed or faxed into the Personal Accounts department.<sup>9</sup>

In 2024, The Company held conversations with the Minnesota Medical Association (MMA) and will continue to assess opportunities to promote information about our medical programs to the MMA. The Company has met with and continues to meet with local organizations for increased awareness around available medical protection for Xcel Energy customers. The Company has also been conducting in-person outreach at community events and senior centers to ensure customers in need of information about the Company's assistance, affordability and medical offerings are aware. The Company participated in more than 18 events in 2024 and plans to continue these efforts in 2025 and beyond. The Company did reach out and invite the organizations identified by Energy Cents Coalition, AARP and the OAG to an information session, however no responses were received.

- I. Feedback from the Department of Commerce, Energy Assistance Unit regarding remote disconnection.

The Department of Commerce submitted comments to Docket No. E002/M-24-27, indicating that:

*The information Xcel provided in response to this Commission reporting requirement suggests that remote disconnection is a far more efficient and cost-effective approach to disconnection for AMI customers than the historical method which requires a site visit.*<sup>10</sup>

In addition, the Department also submitted comments on June 14, 2024 to the docket indicating that:

*The Department does support the Company's request to continue the temporary variance to Minn. R. 7820.2500 for residential and small general customers...*<sup>11</sup>

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<sup>9</sup> <https://mn.my.xcelenergy.com/s/billing-payment/energy-assistance/medical-affordability-program:Medically+Necessary+Equipment+%26+Emergency+Certification+Form.pdf>

<sup>10</sup> Department of Commerce Comments at 10, Docket No. E002/M-24-27, August 27, 2024. [20248-209815-01](#)

<sup>11</sup> Department of Commerce Comments at 3, Docket No. E002/M-24-27, June 14, 2024. [20246-207730-02](#)

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- J. Compliance with all consumer protection measures ordered in this proceeding.

On April 20, 2023, the Company submitted the required consumer protection compliance filing 30 days following the Order,<sup>12</sup> as required, and discussed our compliance with the Commissions' Order Point 4 (1-6) in our 2023 Electric Service Quality Report. Those details are not repeated here.

- K. Detailed information on the number of customers opting out of AMI meter installation and demand-billed customers compared to customers with AMI meters installed.

Table 11 illustrates the number of customers that have chosen to opt-out of an AMI meter installation in 2024. Demand customers are billed from commercial meters only.

**Table 11**  
**2024 AMI Statistics**

Meter Type	Residential	Commercial	Industrial	Other	Total
AMI Opt Outs	2,269	56	N/A	N/A	2,325
AMI	437,521	55,804	5,128	1,045	499,498

- L. A proposal for using the capacity of its advanced metering infrastructure to restore electric service to customers during periods of extreme heat.

Related to this request, under Minnesota Statute § 216B.0975, subpart b:

*A utility may not effect an involuntary disconnection of residential services in affected counties when an excessive heat watch, heat advisory, or excessive heat warning issued by the National Weather Service is in effect. For purposes of this section, "utility" means a public utility providing electric service, municipal utility, or cooperative electric association.*

Consistent with that statute, the Company halts customer disconnections of residential service in affected counties when an excessive heat watch, heat advisory, or

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<sup>12</sup> Docket No. E002/M-22-233, April 20, 2023. [20234-195042-01](#)

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excessive heat warning issued by NWS is in effect. We have not to date, however, restored service (reconnected previously disconnected customers) when an NWS heat event is in effect. In Part III, Section 6, the Company puts forth a proposal for how the capacity of AMI could be used to restore electric service to customers during NWS heat advisories and extreme heat warnings.

Order point 6 of the Commission's March 22, 2023 Order in Docket No E002/M-22-233 requires that *"Within 30 days of filing its 2023, 2024, and 2025 service quality reports, Xcel Energy shall engage stakeholders to discuss the evaluation metrics requirements established in this docket."*

In compliance with this order point, the Company has scheduled a stakeholder discussion on April 15, 2025 to discuss the evaluation metrics established in the AMI Disconnect/Reconnect Docket No E002/22-233. We will file notes from that stakeholder discussion, following the meeting.

U.S. Department of Labor- Bureau of Labor Statistics  
Survey of Occupational Injuries & Illnesses 2024  
Xcel Energy - Minnesota  
Data from 2024 OSHA Form 300A

Location	Ave Empl Count	Ttl Hours Worked	Severity Counts				Day Count		Injury/Illness Classification Counts					
			Deaths	Days Away	Restricted Duty	Other	Restricted Duty	Lost Time	Injuries	Skin Disorders	Respiratory	Poisoning	Hearing	Other
Centre Pointe	82	149,474	0	0	0	0	0	0	0	0	0	0	0	0
Chestnut Service Center	182	405,710	0	3	0	0	58	41	3	0	0	0	0	0
Chestnut Service Center Annex	5	8,891	0	0	0	0	0	0	0	0	0	0	0	0
414 Nicollet Mall	666	1,205,850	0	0	0	0	0	0	0	0	0	0	0	0
King Generating Plant	77	153,804	0	1	1	2	27	1	4	0	0	0	0	0
Prairie Island Nuclear Plant	506	128,106	0	0	1	0	21	0	1	0	0	0	0	0
Rice Street Service Center	377	751,989	0	3	3	1	69	121	7	0	0	0	0	0
St. Cloud Service Center	68	129,572	0	2	1	0	13	118	3	0	0	0	0	0
Waconia Service Center	14	30,785	0	0	0	0	0	0	0	0	0	0	0	0
Winona Service Center	27	52,151	0	1	1	0	85	55	2	0	0	0	0	0
Summary	2,004	3,016,332	0	10	7	3	273	336	20	0	0	0	0	0

Claim ID	Event Date	Claim Date	Cause Code / Event Cause Description	Paid Sum	Bodily Injury
190175949-002	06/28/2023	02/23/2024	1101 ABNORMAL VOLTAGE	\$ 8,338.96	\$ -
190263001-001	10/03/2023	01/30/2024	1122 Poles and Towers	\$ 1,576.32	\$ -
190352815-001	05/10/2024	05/30/2024	1101 ABNORMAL VOLTAGE	\$ 499.00	\$ -
190355168-001	04/16/2024	06/03/2024	OH OTHER	\$ 1,832.62	\$ -
190373506-001	04/15/2024	06/26/2024	1134 WORK PERFORMED ELECTRICAL	\$ 2,043.02	\$ -
190258534-001	01/11/2024	01/24/2024	1136 OUTAGE	\$ 699.00	\$ -
190399064-001	07/03/2024	07/31/2024	1136 OUTAGE	\$ 4,500.00	\$ -
190417500-001	06/05/2024	08/23/2024	1134 WORK PERFORMED ELECTRICAL	\$ 750.00	\$ -
190359221-001	06/06/2024	06/07/2024	1101 ABNORMAL VOLTAGE	\$ 2,054.82	\$ -
190266940-001	08/23/2023	02/05/2024	1134 WORK PERFORMED ELECTRICAL	\$ 72,500.00	\$ -
190403080-001	07/01/2024	08/05/2024	1108 CONTACT WITH ELECTRICAL	\$ 4,186.27	\$ -
190420210-001	08/15/2024	08/27/2024	1114 FIRE/EXPLOSION/SMOKE	\$ 735.00	\$ -
190384679-001	06/17/2024	07/12/2024	1134 WORK PERFORMED ELECTRICAL	\$ 250.00	\$ -
190352874-001	03/23/2024	05/30/2024	1107 CONDUCTORS - UNDERGROUND	\$ 460.00	\$ -
190421684-001	08/06/2024	08/29/2024	1134 WORK PERFORMED ELECTRICAL	\$ 875.00	\$ -
190383865-001	05/19/2024	07/11/2024	1134 WORK PERFORMED ELECTRICAL	\$ 330.00	\$ -
190402992-001	07/21/2024	08/05/2024	1134 WORK PERFORMED ELECTRICAL	\$ 1,385.78	\$ -
190359230-001	05/02/2024	06/07/2024	1117 METER ELECTRIC	\$ 437.40	\$ -
190392666-001	07/02/2024	07/23/2024	1134 WORK PERFORMED ELECTRICAL	\$ 330.07	\$ -
190487746-001	11/06/2024	11/26/2024	1101 ABNORMAL VOLTAGE	\$ 409.97	\$ -
190402970-001	06/26/2024	08/05/2024	1122 POLES AND TOWERS	\$ 914.00	\$ -
190306065-001	03/26/2024	03/28/2024	1136 OUTAGE	\$ 429.00	\$ -
190369804-001	06/05/2024	06/21/2024	SM SMART METER	\$ 392.50	\$ -
190346186-001	04/15/2024	05/21/2024	1122 POLES AND TOWERS	\$ 1,267.35	\$ -
195427954-002	07/24/2020	09/10/2020	1113 Falling equipment or being struck by	\$ -	\$ 15,000.00
190432686-001	07/25/2024	09/12/2024	1134 WORK PERFORMED ELECTRICAL	\$ 300.00	\$ -
190293280-001	11/15/2023	03/11/2024	1113 FALLING EQUIPMENT OR BEING STRUCK BY	\$ 1,545.15	\$ -
190426655-001	08/19/2024	09/05/2024	1134 WORK PERFORMED ELECTRICAL	\$ 505.00	\$ -
190391468-001	06/29/2024	07/22/2024	1134 WORK PERFORMED ELECTRICAL	\$ 580.00	\$ -
190263613-001	01/07/2021	01/31/2024	1136 OUTAGE	\$ 3,000.00	\$ -
190331113-001	04/16/2024	05/01/2024	1113 FALLING EQUIPMENT OR BEING STRUCK BY	\$ 900.00	\$ -
190175949-004	06/28/2023	08/13/2024	1101 ABNORMAL VOLTAGE	\$ 8,900.00	\$ -
190347622-001	04/22/2024	05/22/2024	1136 OUTAGE	\$ 924.64	\$ -
190390394-001	04/16/2024	07/19/2024	1113 FALLING EQUIPMENT OR BEING STRUCK BY	\$ 1,872.73	\$ -
190487906-001	09/01/2024	11/26/2024	1101 ABNORMAL VOLTAGE	\$ 852.43	\$ -
190402948-001	07/15/2024	08/05/2024	1134 WORK PERFORMED ELECTRICAL	\$ 1,205.00	\$ -
190268069-001	06/07/2023	02/06/2024	1101 ABNORMAL VOLTAGE	\$ 15,349.32	\$ -
190369764-001	05/09/2024	06/21/2024	1134 WORK PERFORMED ELECTRICAL	\$ 1,100.00	\$ -
189794164-003	08/28/2021	06/19/2024	1136 OUTAGE	\$ 25,000.00	\$ -
190222869-001	04/01/2023	12/04/2023	1120 MIS LOCATE	\$ 47,377.50	\$ -
190271293-001	01/18/2024	02/09/2024	1107 CONDUCTORS - UNDERGROUND	\$ 879.10	\$ -

190306181-001	12/21/2021	03/28/2024	1117 METER ELECTRIC	\$ 400.00	\$ -
190390083-001	05/15/2024	07/19/2024	1134 WORK PERFORMED ELECTRICAL	\$ 307.00	\$ -
190224960-001	04/02/2023	12/06/2023	1113 FALLING EQUIPMENT OR BEING STRUCK BY	\$ 4,000.00	\$ -
190421933-001	07/11/2024	08/29/2024	1122 POLES AND TOWERS	\$ 1,575.00	\$ -
190303433-001	03/15/2024	03/25/2024	1136 OUTAGE	\$ 1,505.41	\$ -
190166807-001	08/16/2023	09/18/2023	1001 NON OUTAGE ELECTRIC	\$ 852.21	\$ -
190315810-001	03/28/2024	04/10/2024	1106 CONDUCTORS - OVERHEAD	\$ 2,395.09	\$ -
190338368-001	04/21/2023	05/10/2024	1122 POLES AND TOWERS	\$ 2,154.00	\$ -
190368945-001	06/18/2024	06/20/2024	1101 ABNORMAL VOLTAGE	\$ 505.00	\$ -
190175949-003	06/28/2023	04/02/2024	1101 ABNORMAL VOLTAGE	\$ 21,000.00	\$ -
190426633-001	07/25/2024	09/05/2024	1122 POLES AND TOWERS	\$ 6,650.00	\$ -
190426012-001	08/29/2024	09/04/2024	1130 TREE TRIMMING	\$ 6,441.52	\$ -
190200474-001	06/14/2023	11/01/2023	1113 FALLING EQUIPMENT OR BEING STRUCK BY	\$ 2,200.00	\$ -
190320717-001	09/12/2023	04/17/2024	1122 POLES AND TOWERS	\$ 1,219.99	\$ -
190320490-001	03/27/2024	04/17/2024	1136 OUTAGE	\$ 432.44	\$ -
190472688-001	10/12/2024	11/05/2024	1101 ABNORMAL VOLTAGE	\$ 641.54	\$ -
190374457-001	06/09/2024	06/27/2024	1122 POLES AND TOWERS	\$ 2,207.48	\$ -
190429446-001	07/15/2024	09/09/2024	1134 WORK PERFORMED ELECTRICAL	\$ 500.00	\$ -
190366220-001	03/06/2024	06/17/2024	1124 STRUCK BY OR ASSOCIATED W MOBILE EQUIP	\$ 1,000.00	\$ -
190372076-001	05/31/2024	06/25/2024	1001 NON OUTAGE ELECTRIC	\$ 566.42	\$ -
190284335-001	11/24/2023	02/28/2024	1124 STRUCK BY OR ASSOCIATED W MOBILE EQUIP	\$ 1,470.00	\$ -
190395767-001	07/25/2024	07/26/2024	1134 WORK PERFORMED ELECTRICAL	\$ 113.99	\$ -
190432351-001	07/11/2024	09/12/2024	1122 POLES AND TOWERS	\$ 3,600.00	\$ -
190412196-001	10/14/2023	08/16/2024	1134 WORK PERFORMED ELECTRICAL	\$ 192.62	\$ -
190390354-001	06/04/2024	07/19/2024	1121 OTHER NOT LISTED	\$ 441.10	\$ -
190387503-001	04/16/2024	07/16/2024	1130 TREE TRIMMING	\$ 600.00	\$ -
190365643-001	05/02/2024	06/17/2024	1124 STRUCK BY OR ASSOCIATED W MOBILE EQUIP	\$ 614.00	\$ -
190327694-001	01/23/2024	04/26/2024	1136 OUTAGE	\$ 162.00	\$ -
190195468-001	06/21/2023	10/25/2023	1129 TRANSFORMER UNDER GROUND	\$ 565.00	\$ -
190426603-001	05/09/2024	09/05/2024	1134 WORK PERFORMED ELECTRICAL	\$ 675.00	\$ -
190469504-001	10/13/2024	10/31/2024	1101 ABNORMAL VOLTAGE	\$ 862.44	\$ -
190180886-001	08/13/2023	10/05/2023	1101 ABNORMAL VOLTAGE	\$ 962.03	\$ -
190372311-001	04/30/2024	06/25/2024	1130 TREE TRIMMING	\$ 541.88	\$ -
190204538-001	06/28/2023	11/07/2023	1134 WORK PERFORMED ELECTRICAL	\$ 12,000.00	\$ -
				[Protected Data Begins]	
195461125-001	03/22/2020	09/22/2020	1106 CONDUCTORS - OVERHEAD		
189804598-001	05/13/2022	06/09/2022	1114 FIRE/EXPLOSION/SMOKE		
195428115-001	11/08/2020	11/13/2020	1108 Contact with Electrical		
195427067-001	10/03/2019	11/13/2019	1108 Contact with Electrical		
189532351-001	05/24/2021	05/25/2021	1106 CONDUCTORS - OVERHEAD		
195427100-001	09/17/2019	10/16/2019	1114 Fire/Explosion/Smoke		
				Protected Data Ends]	

A. The number and percentage of customer meters read by utility personnel (Company).

	Residential	Commercial	Industrial	Other	A Total	B Total Number of Meters Installed	A÷B Percent Read by Utility (Company)
JANUARY	1705070	166501	13284	3797	1888652	1892251	99.81%
FEBRUARY	1706058	166464	13275	3803	1889600	1894076	99.76%
MARCH	1707954	166537	13275	3802	1891568	1895011	99.82%
APRIL	1709334	166429	13261	3812	1892836	1896809	99.79%
MAY	1710358	166499	13254	3809	1893920	1898687	99.75%
JUNE	1712350	166667	13241	3806	1896064	1900264	99.78%
JULY	1713676	166798	13235	3802	1897511	1901803	99.77%
AUGUST	1715010	166825	13214	3798	1898847	1903338	99.76%
SEPTEMBER	1716642	166895	13177	3795	1900509	1904948	99.77%
OCTOBER	1718455	167036	13086	3784	1902361	1906759	99.77%
NOVEMBER	1719829	167277	12934	3782	1903822	1907931	99.78%
DECEMBER	1719061	165168	12457	3727	1900413	1910109	99.49%

\*The number of reads per month is based on the meter read schedule for the month. For example, January 2024 runs from December 31, 2023 to February 4, 2024 to capture all meter read routes.

B. The number and percentage of customer meters read by customers.

	Residential	Commercial	Industrial	Other	A Total	B Total Number of Meters Installed	A÷B Percent Read by Customer
JANUARY	11	1			12	1892251	0.00%
FEBRUARY	7				7	1894076	0.00%
MARCH	4	2			6	1895011	0.00%
APRIL	7				7	1896809	0.00%
MAY	9				9	1898687	0.00%
JUNE	5				5	1900264	0.00%
JULY	10				10	1901803	0.00%
AUGUST	9		1		10	1903338	0.00%
SEPTEMBER	7				7	1904948	0.00%
OCTOBER	11	1			12	1906759	0.00%
NOVEMBER	4				4	1907931	0.00%
DECEMBER	6				6	1910109	0.00%

C-1. The number and percentage of customer meters that have not been read by utility personnel for periods of six to 12 months and an explanation as to why they have not been read.

The tables below show this information by account class: residential, commercial, industrial, and other.

**Account Class: Residential**

MESSAGE	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTAL	PERCENT
NO READING RETURNED	637	512	345	366	352	356	453	555	613	613	442	304	5548	85.86%
OC METER MAINT	25	23	35	47	33	31	30	21	27	17	20	33	342	5.29%
METER REMOVED	10	12	8	16	8	4	7	4	1	4	5	9	88	1.36%
NO ANSWER	18	14	5	5	4	4	4	6	2	4	6	4	76	1.18%
NEED KEY OR CODE	6	9	4	10	7	4	5	2	1	6	5	0	59	0.91%
SERVICE CUT AT POLE	11	10	9	5	3	4	2	3	0	2	3	3	55	0.85%
SPS DEAD REGISTER	7	19	12	5	2	1	1	2	0	2	2	2	55	0.85%
VACANT	1	0	25	0	1	2	1	1	2	3	2	0	38	0.59%
METER OFF	5	3	7	4	2	2	1	0	3	5	3	1	36	0.56%
BAD KEY OR CODE	4	4	1	3	5	1	0	1	0	0	2	2	23	0.36%
DEAD REGISTER	7	7	1	0	2	0	0	1	2	1	1	0	22	0.34%
GATE PROBLEM	3	3	2	2	0	0	1	1	0	2	3	2	19	0.29%
BAD ROAD	0	0	0	0	0	0	5	5	0	2	0	1	13	0.20%
KEY NOT AVAILABLE	6	2	2	1	1	0	0	0	0	0	0	0	12	0.19%
DOG	3	1	3	0	1	0	0	1	0	0	0	1	10	0.15%
METER BLOCKED	1	4	1	1	1	1	0	0	0	0	0	1	10	0.15%
NO ACCESS BACK YARD	2	2	0	3	0	1	0	0	1	0	0	1	10	0.15%
HANDHELD ESTIMATE	0	0	0	0	1	1	1	1	1	1	1	1	8	0.12%
NON-ENERGIZED	1	2	3	0	1	0	0	1	0	0	0	0	8	0.12%
DOOR LOCKED	3	1	1	0	0	0	1	0	0	0	0	1	7	0.11%
REPLACE GLASS	2	0	0	0	0	1	2	1	0	0	0	1	7	0.11%
OC CELLNET NEW: NO PREMISE ID	0	0	0	0	0	1	1	1	1	0	0	0	4	0.06%
UNSAFE CONDITION	0	0	1	0	1	0	0	0	0	1	0	0	3	0.05%
CUSTOMER READING	1	1	0	0	0	0	0	0	0	0	0	0	2	0.03%
EMED METER MAINT	0	0	0	1	0	1	0	0	0	0	0	0	2	0.03%
ABS MCC CALC READING	1	0	0	0	0	0	0	0	0	0	0	0	1	0.02%
INCLEMENT WEATHER	0	0	0	0	0	0	0	1	0	0	0	0	1	0.02%
OC RECORD MISMATCH	0	0	0	0	0	0	0	1	0	0	0	0	1	0.02%
REFUSED ADMITTANCE	0	0	0	0	0	0	0	0	0	0	1	0	1	0.02%
SNOW/MUD	0	0	1	0	0	0	0	0	0	0	0	0	1	0.02%
TOTAL	754	629	466	469	425	415	515	609	654	663	496	367	6462	100%



**Account Class: Commercial**

MESSAGE	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTAL	PERCENT
NO READING RETURNED	93	89	85	88	84	74	85	77	56	56	51	55	893	66.39%
METER OFF	5	6	7	5	4	5	4	6	16	12	12	11	93	6.91%
SPS DEAD REGISTER	4	2	6	4	6	7	5	6	5	13	9	4	71	5.28%
NO ANSWER	1	4	2	4	3	2	3	1	3	7	8	2	40	2.97%
NEED KEY OR CODE		2	3	4	6	1	2	2	5	3	3	3	34	2.53%
VACANT	2	2	1	1	1	3	3		1	5	7	7	33	2.45%
DEAD REGISTER	3	3	5	4		2	3	2	3	1	1	4	31	2.30%
SERVICE CUT AT POLE	1	2		2	2	3	5	3	2	4	1	4	29	2.16%
METER REMOVED	2	1	2	1	1	2	1	2	2	1	4	2	21	1.56%
CUST REQUESTS SKIP								5		5	5	5	20	1.49%
OC Meter Maint	3		2	1				2	3	1	1	1	14	1.04%
DOOR LOCKED			2	2	2	2				1		1	10	0.74%
ABS Data Corrupt - BS	1	1	1	1	1	1	1	1	1				9	0.67%
BUSINESS CLOSED				1				1	1	1	2	2	8	0.59%
CANNOT LOCATE						2		1		1		3	7	0.52%
UNSAFE CONDITION			1					3	2				6	0.45%
Non-Energized		3	1				1		1				6	0.45%
BAD KEY OR CODE	1				1			1					3	0.22%
METER WILL NOT PROBE								1	1				2	0.15%
METER BLOCKED				1	1								2	0.15%
HANDHELD ESTIMATE				2									2	0.15%
GATE PROBLEM										2			2	0.15%
Bad Ert										1	1		2	0.15%
KEY NOT AVAILABLE	1					1							2	0.15%
PAINTED OVER									1				1	0.07%
SEASONAL												1	1	0.07%
REFUSED ADMITTANCE										1			1	0.07%
EMED Data Corrupt												1	1	0.07%
BAD ROAD					1								1	0.07%
Grand Total	117	115	118	121	113	105	113	114	103	115	105	106	1345	100%

[illegible]

C-2. The number and percentage of customer meters that have not been read by utility personnel for periods of longer than 12 months and an explanation as to why they have not been read.

The tables below show this information by account class: residential, commercial, industrial, and other.

**Account Class: Residential**

MESSAGE	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTAL	PERCENT
NO READING RETURNED	190	190	181	163	146	151	155	159	132	150	112	127	1856	77.53%
OC METER MAINT	19	13	17	21	15	20	13	11	9	6	2	5	151	6.31%
METER OFF	6	7	6	5	7	3	8	11	2	9	4	7	75	3.13%
NO ANSWER	18	15	9	5	6	1	1	3	1	3	3	4	69	2.88%
NEED KEY OR CODE	1	1	9	5	4	0	3	4	1	2	3	1	34	1.42%
SERVICE CUT AT POLE	4	1	1	4	4	4	3	3	1	3	3	1	32	1.34%
SPS DEAD REGISTER	3	3	5	2	0	1	1	1	1	6	2	1	26	1.09%
VACANT	4	4	2	1	0	0	1	0	2	6	3	2	25	1.04%
METER REMOVED	3	1	3	1	0	2	2	2	2	3	3	2	24	1%
DEAD REGISTER	6	4	4	0	0	1	1	1	0	0	0	0	17	0.71%
BAD KEY OR CODE	3	5	0	3	1	1	0	2	0	0	0	0	15	0.63%
NON-ENERGIZED	1	1	1	1	1	1	1	1	2	1	0	0	11	0.46%
CUSTOMER READING	0	0	0	1	1	1	1	1	1	1	1	1	9	0.38%
KEY NOT AVAILABLE	2	0	0	6	0	0	0	1	0	0	0	0	9	0.38%
NO ACCESS BACK YARD	2	1	0	1	0	1	1	1	0	0	1	0	8	0.33%
DOOR LOCKED	0	0	2	2	1	2	0	0	0	0	0	0	7	0.29%
METER BLOCKED	2	1	0	1	1	1	1	0	0	0	0	0	7	0.29%
GATE PROBLEM	0	2	0	0	0	1	1	0	0	1	1	0	6	0.25%
REFUSED ADMITTANCE	0	0	2	0	0	0	0	0	0	0	1	0	3	0.13%
UNSAFE CONDITION	0	0	0	1	0	1	1	0	0	0	0	0	3	0.13%
HANDHELD ESTIMATE	0	0	0	0	0	0	0	0	0	0	1	1	2	0.08%
OC CELLNET NEW: NO PREMISE ID	0	0	0	0	0	0	0	0	0	1	1	0	2	0.08%
CANNOT LOCATE	0	0	0	0	1	0	0	0	0	0	0	0	1	0.04%
CUST REQUESTS SKIP	1	0	0	0	0	0	0	0	0	0	0	0	1	0.04%
DOG	0	0	0	1	0	0	0	0	0	0	0	0	1	0.04%
TOTAL	265	249	242	224	188	192	194	201	154	192	141	152	2394	100%

**Account Class: Commercial**

MESSAGE	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTAL	PERCENT
NO READING RETURNED	94	89	85	88	84	74	86	79	57	57	53	56	902	66.52%
METER OFF	5	6	7	5	4	5	4	6	17	13	12	11	95	7.01%
SPS DEAD REGISTER	4	2	6	4	6	7	5	6	5	13	9	4	71	5.24%
NO ANSWER	1	4	2	4	3	2	3	1	3	7	8	2	40	2.95%
NEED KEY OR CODE	0	2	3	4	6	1	2	2	5	3	3	3	34	2.51%
VACANT	2	2	1	1	1	3	3	0	1	5	7	7	33	2.43%
DEAD REGISTER	3	3	5	4	0	2	3	2	3	1	1	4	31	2.29%
SERVICE CUT AT POLE	1	2	0	2	2	3	5	3	2	4	1	4	29	2.14%
METER REMOVED	2	1	2	1	1	2	1	2	2	1	4	2	21	1.55%
CUST REQUESTS SKIP	0	0	0	0	0	0	0	5	0	5	5	5	20	1.47%
OC METER MAINT	3	0	2	1	0	0	0	2	3	1	1	1	14	1.03%
DOOR LOCKED	0	0	2	2	2	2	0	0	0	1	0	1	10	0.74%
ABS DATA CORRUPT - BS	1	1	1	1	1	1	1	1	1	0	0	0	9	0.66%
BUSINESS CLOSED	0	0	0	1	0	0	0	1	1	1	2	2	8	0.59%
CANNOT LOCATE	0	0	0	0	0	2	0	1	0	1	0	3	7	0.52%
NON-ENERGIZED	0	3	1	0	0	0	1	0	1	0	0	0	6	0.44%
UNSAFE CONDITION	0	0	1	0	0	0	0	3	2	0	0	0	6	0.44%
BAD KEY OR CODE	1	0	0	0	1	0	0	1	0	0	0	0	3	0.22%
BAD ERT	0	0	0	0	0	0	0	0	0	1	1	0	2	0.15%
GATE PROBLEM	0	0	0	0	0	0	0	0	0	2	0	0	2	0.15%
HANDHELD ESTIMATE	0	0	0	2	0	0	0	0	0	0	0	0	2	0.15%
KEY NOT AVAILABLE	1	0	0	0	0	1	0	0	0	0	0	0	2	0.15%
METER BLOCKED	0	0	0	1	1	0	0	0	0	0	0	0	2	0.15%
METER WILL NOT PROBE	0	0	0	0	0	0	0	1	1	0	0	0	2	0.15%
BAD ROAD	0	0	0	0	1	0	0	0	0	0	0	0	1	0.07%
EMED DATA CORRUPT	0	0	0	0	0	0	0	0	0	0	0	1	1	0.07%
PAINTED OVER	0	0	0	0	0	0	0	0	1	0	0	0	1	0.07%
REFUSED ADMITTANCE	0	0	0	0	0	0	0	0	0	1	0	0	1	0.07%
SEASONAL	0	0	0	0	0	0	0	0	0	0	0	1	1	0.07%
TOTAL	118	115	118	121	113	105	114	116	105	117	107	107	1356	100%

**Account Class: Industrial**

MESSAGE	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTAL	PERCENT
NO READING RETURNED	13	11	11	16	14	18	18	20	15	11	11	10	168	78.50%
METER OFF	0	0	2	2	1	2	2	2	1	1	1	0	14	6.54%
SPS DEAD REGISTER	1	0	2	0	2	2	1	0	2	1	0	2	13	6.07%
DEAD REGISTER	1	1	1	1	0	0	1	1	1	0	0	0	7	3.27%
VACANT	0	0	0	0	0	0	1	0	1	2	1	1	6	2.80%
METER REMOVED	0	0	0	0	0	0	0	0	1	1	0	2	4	1.87%
METER WILL NOT PROBE	0	1	0	0	0	0	0	0	0	0	0	0	1	0.47%
NEED KEY OR CODE	0	0	0	0	1	0	0	0	0	0	0	0	1	0.47%
TOTAL	15	13	16	19	18	22	23	23	21	16	13	15	214	100%

**Account Class: Other**

MESSAGE	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTAL	PERCENT
NO READING RETURNED	1	1	1	1	1	1	1	1	2	1	1	2	14	87.50%
METER OFF	0	0	0	0	0	0	1	0	0	1	0	0	2	12.50%
TOTAL	1	1	1	1	1	1	2	1	2	2	1	2	16	100%

C. Total number of meters installed, as of the end of the month indicated.\*\*

	Residential	Commercial	Industrial	Other	Total
JANUARY	1706203	168592	13335	4121	1892251
FEBRUARY	1708033	168582	13332	4129	1894076
MARCH	1708923	168622	13332	4134	1895011
APRIL	1710703	168639	13327	4140	1896809
MAY	1712535	168687	13324	4141	1898687
JUNE	1713961	168849	13314	4140	1900264
JULY	1715342	169012	13307	4142	1901803
AUGUST	1716815	169082	13302	4139	1903338
SEPTEMBER	1718341	169171	13297	4139	1904948
OCTOBER	1719963	169366	13292	4138	1906759
NOVEMBER	1720955	169553	13286	4137	1907931
DECEMBER	1722926	169764	13280	4139	1910109

\*\*We have removed “deleted meters” from the total number of meters installed. The “deleted meters” designation is given to meters that were incorrectly entered into the system and were never truly installed at a premise. This ensures our data is more representative of meters in the field.

E-1. Discreet meters unread for 6-12 months

All Occurrences Not Read for 6-12 Months					
Year	Residential	Commercial	Industrial	Other	Total
2020	1,794	953	386	13	3,146
2021	2,325	809	250	4	3,388
2022	11,765	1,196	163	11	13,135
2023	16,857	2,366	175	4	19,402
2024	6,462	1,900	182	10	8,554

E-2. Discreet meters unread for 12+ months

All Occurrences Not Read for Longer than 12 Months					
Year	Residential	Commercial	Industrial	Other	Total
2020	773	684	371	40	1,868
2021	639	674	722	20	2,055
2022	2112	784	591	25	3,512
2023	3,444	1,020	142	14	4,620
2024	2,394	1,356	214	16	3,980

Utility	Work Resolution	Data	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Grand Total	
Electric	INVESTIGATE AND REMEDIATE	Order Count	339	198	211	218	137	122	84	120	84	65	62	34	1674	
		Average Days	11.14	4.80	5.64	10.00	8.53	5.95	5.25	5.03	14.82	14.74	4.85	2.26	8.13	
		Min Days	0	0	1	0	1	1	1	1	1	1	1	1	0	
		Max of Days	687	107	168	458	289	198	98	164	384	336	55	4	687	
		StdDev of Days	47.31	11.19	12.75	42.31	32.57	19.81	14.10	18.18	61.84	49.70	8.17	1.08	34.13	
	INVESTIGATE AND REFER	Order Count	20	14	13	22	14	17	9	16	10	8	12	3	158	
		Average Days	6.60	12.36	3.46	16.27	5.43	3.24	40.11	13.50	33.00	2.88	2.75	3.67	11.47	
		Min Days	2	2	0	0	0	1	1	1	1	1	1	3	0	
		Max of Days	56	118	7	192	35	7	342	180	286	5	6	4	342	
		StdDev of Days	11.72	30.45	2.18	45.11	8.67	1.79	113.22	44.43	88.99	1.36	1.96	0.58	42.17	
	REMEDIATE UPON REFERRAL	Order Count	1	4		1										6
		Average Days	126.00	91.50		70.00										93.67
		Min Days	126	1		70										1
		Max of Days	126	167		70										167
		StdDev of Days	#DIV/0!	88.04		#DIV/0!										70.53
Electric Order Count			360	216	224	241	151	139	93	136	94	73	74	37	1838	
Electric Average Days			11.21	6.90	5.52	10.82	8.24	5.62	8.62	6.02	16.76	13.44	4.51	2.38	8.70	
Electric Min Days			0	0	0	0	0	1	1	1	1	1	1	1	0	
Electric Max of Days			687	167	168	458	289	198	342	180	384	336	55	4	687	
Electric StdDev of Days			46.40	20.45	12.39	42.59	31.13	18.58	37.44	22.76	64.89	47.01	7.55	1.11	35.37	
Gas	INVESTIGATE AND REMEDIATE	Order Count	195	149	160	150	149	141	174	287	328	215	160	207	2315	
Average Days		6.12	4.58	7.03	6.20	8.66	6.90	30.37	11.01	7.35	13.89	23.09	58.26	15.46		
Min Days		1	1	0	1	1	0	1	0	0	0	0	1	0		
Max of Days		21	24	124	102	133	107	466	494	131	205	210	332	494		
StdDev of Days		3.75	3.40	14.25	9.02	12.89	11.82	62.57	33.13	13.80	31.17	38.41	71.27	36.99		
	INVESTIGATE AND REFER	Order Count	42	24	20	13	30	19	14	18	28	40	25	39	312	
		Average Days	8.26	5.54	4.90	5.23	19.43	4.53	11.29	12.50	6.93	6.13	13.04	57.08	15.03	
		Min Days	1	1	1	1	1	1	1	0	2	1	1	1	0	
		Max of Days	109	27	16	13	401	14	33	77	18	25	61	244	401	
		StdDev of Days	16.22	5.36	3.97	3.92	72.38	4.14	10.00	23.58	4.09	4.72	14.75	73.76	38.98	
	REMEDIATE UPON REFERRAL	Order Count	34	20	3	5	5	6	5	3	1	1	3	1	87	
		Average Days	8.15	9.00	13.00	12.20	2.40	8.33	9.80	7.67	5.00	14.00	9.67	17.00	8.69	
		Min Days	1	1	6	3	1	5	3	7	5	14	7	17	1	
		Max of Days	19	21	24	22	5	13	21	9	5	14	12	17	24	
		StdDev of Days	4.86	5.57	9.64	7.40	1.67	3.01	7.85	1.15	#DIV/0!	#DIV/0!	2.52	#DIV/0!	5.44	
Gas Order Count			271	193	183	168	184	166	193	308	357	256	188	247	2714	
Gas Average Days			6.70	5.16	6.90	6.30	10.25	6.68	28.45	11.06	7.31	12.68	21.54	57.90	15.19	
Gas Min Days			1	1	0	1	1	0	1	0	0	0	0	1	0	
Gas Max of Days			109	27	124	102	401	107	466	494	131	205	210	332	494	
Gas StdDev of Days			7.34	4.15	13.46	8.73	31.34	11.01	59.75	32.46	13.28	28.75	36.00	71.42	36.66	
Total E & G Order Count			631	409	407	409	335	305	286	444	451	329	262	284	4552	
Total E & G Average Days			9.27	6.08	6.14	8.96	9.34	6.20	22.00	9.52	9.28	12.84	16.73	50.67	12.57	
Total E & G Days Min			0	0	0	0	0	0	1	0	0	0	0	1	0	
Total E & G Days Max			687	167	168	458	401	198	466	494	384	336	210	332	687	
Total E & G Days Std Dev			35.42	15.14	12.88	33.22	31.22	14.93	54.26	29.89	32.01	33.58	31.68	69.17	36.28	



[illegible]

R=Residential  
C=Commercial

	January		February		March		April		May		June		July		August		September		October		November		December		Total 2024	
	R	C	R	C	R	C	R	C	R	C	R	C	R	C	R	C	R	C	R	C	R	C	R	C	R	C
Number of customers who received disconnect notices <sup>1</sup>	71,005	5,763	71,622	6,141	70,339	3,377	60,885	6,411	62,973	6,522	49,597	5,191	51,735	5,490	59,237	6,111	62,263	5,166	66,412	6,012	58,470	5,023	50,158	5,020	734,696	66,227

Number of customers who sought cold weather rule protection <sup>1</sup>																											
Sought	15,866	0	13,725	0	15,905	0	22,204	0	0	0	0	0	0	0	0	0	0	0	18,409	0	17,979	0	13,971	0	118,059	0	
Granted	15,866	0	13,725	0	15,905	0	22,204	0	0	0	0	0	0	0	0	0	0	0	18,409	0	17,979	0	13,971	0	118,059	0	

Number of customers locked for nonpayment	2,074	17	1,380	38	1,355	52	2,565	50	10,086	74	7,818	56	9,024	72	8,472	77	2,209	47	3,553	72	2,402	69	1,611	34	52,549	658
Number of total customers restored to service within 24 hours	1,104	3	677	4	641	12	1,301	6	5,142	16	4,494	12	5,457	18	5,271	27	1,440	3	2,109	19	1,442	15	941	8	30,019	143
Number of customers restored to service with pay arrangements	1,153	0	764	1	710	7	1,300	3	5,249	3	4,144	4	4,384	4	3,914	3	928	1	1,740	1	1,034	3	720	0	26,040	30

1. The data for customers receiving disconnect notices and seeking cold weather rule protection represents a combination of gas and electric customers. Approximately 94% of Xcel Energy's Minnesota customers are electric or combined gas and electric customers. For those customers receiving gas and electric service, the disconnect is due to the total amount of regulated charges overdue. Thus the ability to track disconnects due to electric non-payment would be difficult since Xcel Energy's customer service system does not have the functionality to sort the data in this manner.

		January	February	March	April	May	June	July	August	September	October	November	December	2024
1	All <b>Residential</b> Calls offered to Agents	54,938	56,183	59,247	64,921	78,775	77,480	92,113	101,284	67,323	71,246	56,243	52,241	831,994
2	All <b>BSC</b> Calls Offered to Agents	5,025	5,934	5,621	5,567	5,059	4,455	4,992	4,771	3,127	3,859	2,750	2,859	54,019
3	All <b>Credit</b> Calls Offered to Agents	17,516	18,061	18,789	26,448	33,858	27,253	28,999	28,573	22,479	21,008	23,158	20,933	287,075
4	All <b>PAR</b> Calls Offered to Agents	2,601	2,658	2,938	4,429	5,709	4,798	5,689	5,485	4,843	3,646	3,169	2,965	48,930
5	All Calls Offered to Agents	80,080	82,836	86,595	101,365	123,401	113,986	131,793	140,113	97,772	99,759	85,320	78,998	1,222,018
6	All <b>Residential</b> Calls Answered by Agents within 20 seconds	15,848	12,022	14,600	13,824	19,950	22,312	23,452	28,408	31,789	65,302	53,689	50,105	351,301
7	All <b>BSC</b> Calls Answered by Agents within 20 seconds	2,368	1,885	2,823	2,840	2,470	2,205	2,469	2,908	1,435	2,695	2,411	1,742	28,251
8	All <b>Credit</b> Calls Answered by Agents within 20 seconds	12,345	11,589	10,940	7,982	1,707	1,589	908	1,008	3,468	18,756	22,059	20,083	112,434
9	All <b>PAR</b> Calls Answered by Agents within 20 seconds	1,962	1,841	1,917	1,396	3,259	2,698	2,899	2,839	2,699	2,523	2,473	2,477	28,983
10	All Calls Answered by Agents within 20 seconds	32,523	27,337	30,280	26,042	27,386	28,804	29,728	35,163	39,391	89,276	80,632	74,407	520,969
11	Non-Billing and Non-Outage Calls Completed in IVR	36,272	44,847	50,305	57,964	60,068	53,782	73,080	87,988	54,566	48,562	51,958	49,696	669,088
12	Billing Calls Handled by IVR	105,589	110,557	110,944	121,002	113,694	105,110	124,832	130,176	113,440	115,693	107,872	103,659	1,362,568
13	Outage Calls Handled by IVR	5,036	5,890	5,445	10,778	16,071	25,674	42,705	53,622	8,490	11,913	5,812	7,858	199,294
14	Outage Calls Offered to Agents	9,277	8,156	9,206	12,907	21,047	23,529	33,092	41,785	16,470	16,582	11,820	10,877	214,748
15	Total Outage Calls	14,313	14,046	14,651	23,685	37,118	49,203	75,797	95,407	24,960	28,495	17,632	18,735	414,042
16	All Calls Offered to Agents + Outage Calls Handled by IVR	85,116	88,726	92,040	112,143	139,472	139,660	174,498	193,735	106,262	111,672	91,132	86,856	1,421,312
17	All Calls Answered by Agents within 20 seconds + Outage Calls Handled by IVR	37,559	33,227	35,725	36,820	43,457	54,478	72,433	88,785	47,881	101,189	86,444	82,265	720,263
18	Res and BSC Calls Offered to Agents + Outage Calls Handled by IVR	85,116	88,726	92,040	112,143	139,472	139,660	174,498	193,735	106,262	111,672	91,132	86,856	1,421,312
19	Res and BSC Calls Answered by Agents within 20 seconds + Outage Calls Handled by IVR	37,559	33,227	35,725	36,820	43,457	54,478	72,433	88,785	47,881	101,189	86,444	82,265	720,263

		January	February	March	April	May	June	July	August	September	October	November	December	2024
20	Service Level All Calls (Residential, BSC, Credit and PAR and all calls handled by IVR)	79.0%	77.3%	77.8%	74.1%	69.3%	71.5%	72.6%	74.5%	78.7%	96.2%	98.1%	98.1%	79.7%
21	Service Level All Calls (Residential, BSC, Credit and PAR) and IVR Handled Outage Calls	44.1%	37.4%	38.8%	32.8%	31.2%	39.0%	41.5%	45.8%	45.1%	90.6%	94.9%	94.7%	50.7%
22	Service Level (agent only)	40.6%	33.0%	35.0%	25.7%	22.2%	25.3%	22.6%	25.1%	40.3%	89.5%	94.5%	94.2%	42.6%
23	Average Speed of Answer - ASA (Agent only Residential, BSC, Credit and PAR)	231	455	404	403	424	402	701	665	294	15	11	11	349
	ASA Residential	323	672	600	576	380	334	566	442	121	10	10	6	330
	ASA BSC	153	269	165	157	165	176	193	105	180	77	21	112	155
	ASA Credit	22	34	29	121	630	697	1436	1933	984	15	10	9	489
	ASA PAR	31	37	45	231	86	119	102	96	80	50	28	19	83

Notes:	
11	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.
20	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)
21	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 both company offices and at remote locations where agents work at home.
	Data on calls to agents is gathered from the phone switch (Avaya) based on skills.
	Data on IVR calls is gathered from the IVR reporting tool (Voice Portal).
	BSC = Business Solutions Center
	PAR = Personal Account Representative

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

**ANNUAL SUMMARY OF CUSTOMER COMPLAINTS**

For the period of January 01, 2024 to December 31, 2024  
filed in accordance with Minn. R. 7820.0500

**Name of Utility:** Northern States Power Company, a Minnesota Corporation  
**Address:** 3115 Centre Pointe Drive, Roseville, MN 55113  
**Prepared by:** Robert Duenes, Customer Advocate Analyst, Customer Care (806) 513-1493

		<u>RESIDENTIAL</u>			<u>COMMERCIAL</u>			<u>INDUSTRIAL</u>			<u>GOVERNMENT</u>		
		<u>Received</u>	<u>Resolved</u>	<u>Unresolved</u>	<u>Received</u>	<u>Resolved</u>	<u>Unresolved</u>	<u>Received</u>	<u>Resolved</u>	<u>Unresolved</u>	<u>Received</u>	<u>Resolved</u>	<u>Unresolved</u>
I.	Complaint Type												
	A. Billing Error	219	147	72	5	2	3	-	-	-	-	-	-
	B. High Bill	33	30	3	-	-	-	-	-	-	-	-	-
	C. Inaccurate Metering	29	22	7	2	2	-	-	-	-	-	-	-
	D. Inadequate Service	697	616	81	16	10	6	-	-	-	-	-	-
	D.1. Inadequate Service: CWRP	139	117	22	1	-	1	-	-	-	-	-	-
	D.2. Inadequate Service: Customer Service	6	5	1	-	-	-	1	1	-	-	-	-
	D.3. Inadequate Service: Field/Operations	102	87	15	7	6	1	-	-	-	-	-	-
	D.4. Inadequate Service: Programs and Services	450	407	43	8	4	4	-	-	-	-	-	-
	E. Service Ext Interval	56	46	10	4	4	-	-	-	-	-	-	-
	F. Service Rest Interval	19	12	7	1	1	-	1	1	-	-	-	-
	G. Wrongful Disconnect	383	354	29	3	2	1	-	-	-	-	-	-
	<b>Total Complaints</b>	<b>1,436</b>	<b>1,227</b>	<b>209</b>	<b>31</b>	<b>21</b>	<b>10</b>	<b>1</b>	<b>1</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>

		<u>Electric</u>			<u>Gas</u>		
II. Number of Customers		<u>2023</u>	<u>2024</u>	<u>Net Change</u>	<u>2023</u>	<u>2024</u>	<u>Net Change</u>
Residential	1,212,790	1,230,057	17,267	449,623	454,012	4,389	
Commercial/ Industrial	137,010	137,671	661	36,017	36,192	175	
<u>Other</u>	7,378	7,528	150	427	419	-8	
<b>Total</b>	1,357,178	1,375,256	18,078	486,067	490,623	4,556	

Note: A customer that has both gas and electric service from Xcel Energy will be included in both gas and electric counts

A. The Number of Complaints Received													
Count of Incident ID	Month												
Row Labels	1	2	3	4	5	6	7	8	9	10	11	12	Grand Total
<b>Commercial</b>	<b>2</b>	<b>1</b>	<b>5</b>	<b>8</b>	<b>5</b>	<b>5</b>	<b>3</b>	<b>6</b>	<b>1</b>	<b>2</b>	<b>8</b>	<b>4</b>	<b>50</b>
BBB								1					1
Commission	2		5	5	3	3	1	3		2	4	3	31
Informational				1	1	1	1	1	1			1	7
Internal		1			1	1					1		4
OAG				2			1	1			2		6
Officer											1		1
<b>Industrial</b>									<b>1</b>		<b>1</b>		<b>2</b>
Commission									1				1
Internal											1		1
<b>Residential</b>	<b>81</b>	<b>93</b>	<b>82</b>	<b>112</b>	<b>217</b>	<b>276</b>	<b>225</b>	<b>251</b>	<b>161</b>	<b>197</b>	<b>120</b>	<b>114</b>	<b>1,929</b>
BBB	3	4	6	6	3	10	10	12	4	7	4	3	72
BBB/Commission		1	1			1		1			1		5
BBB/OAG									1				1
Commission	47	47	48	70	167	221	171	184	117	150	94	86	1,402
Commission/BBB										2			2
Commission/BBB/OAG								1					1
Commission/Internal										1			1
Commission/Internal/OAG				1									1
Commission/OAG	1		2	2	2		3	3	2	1	2	2	20
Commission/OAG/Officer					1								1
Commission/Officer		1				1						1	3
Direct Customer Contact						1		1					2
Government									1				1
Informational	8	11	4	5	6	14	4	4	8	9	3	5	81
Informational/OAG						1	1			1			3
Internal	6	12	14	9	16	7	14	15	11	5	5	2	116
Internal/OAG							1						1
Internal/Officer			1							1			2
Media Relations										1			1
OAG	16	16	5	19	19	18	18	30	16	19	9	11	196
OAG/BBB					1		1						2
OAG/Internal											1		1
Officer		1			2	2	2		1		1	4	13
Subpoena			1										1
<b>Grand Total</b>	<b>83</b>	<b>94</b>	<b>87</b>	<b>120</b>	<b>222</b>	<b>281</b>	<b>228</b>	<b>257</b>	<b>163</b>	<b>199</b>	<b>129</b>	<b>118</b>	<b>1,981</b>

[illegible]

C. The Number and Percentage of Complaints Resolved upon:														
Count of Incident ID	Month													
Row Labels	1	2	3	4	5	6	7	8	9	10	11	12	Grand Total	
Commercial	2	1	5	8	5	5	3	6	1	2	8	4	50	
10 Days or Less			1	1		1		2	1				6	
Greater Than 10 Days	2	1	4	7	3	3	2	3			4	2	31	
Immediate					1								1	
Still Open					1	1	1	1		2	4	2	12	
Industrial									1		1		2	
10 Days or Less									1		1		2	
Residential	81	93	82	112	217	276	225	251	161	197	120	114	1,929	
10 Days or Less	19	25	15	22	31	39	34	10	27	27	16	23	288	
Greater Than 10 Days	54	58	63	84	164	206	165	184	106	117	64	32	1,297	
Immediate	8	9	3	5	14	9	12	12	8	13	5	4	102	
Still Open		1	1	1	8	22	14	45	20	40	35	55	242	
Grand Total	83	94	87	120	222	281	228	257	163	199	129	118	1,981	

Count of Incident ID	Month													
Row Labels	1	2	3	4	5	6	7	8	9	10	11	12	Grand Total	
Commercial	2%	1%	6%	7%	2%	2%	1%	2%	1%	1%	6%	3%	3%	
10 Days or Less	0%	0%	20%	13%	0%	20%	0%	33%	100%	0%	0%	0%	12%	
Greater Than 10 Days	100%	100%	80%	88%	60%	60%	67%	50%	0%	0%	50%	50%	62%	
Immediate	0%	0%	0%	0%	20%	0%	0%	0%	0%	0%	0%	0%	2%	
Still Open	0%	0%	0%	0%	20%	20%	33%	17%	0%	100%	50%	50%	24%	
Industrial	0%	0%	0%	0%	0%	0%	0%	0%	1%	0%	1%	0%	0%	
10 Days or Less									100%		100%		100%	
Residential	98%	99%	94%	93%	98%	98%	99%	98%	99%	99%	93%	97%	97%	
10 Days or Less	23%	27%	18%	20%	14%	14%	15%	4%	17%	14%	13%	20%	15%	
Greater Than 10 Days	67%	62%	77%	75%	76%	75%	73%	73%	66%	59%	53%	28%	67%	
Immediate	10%	10%	4%	4%	6%	3%	5%	5%	5%	7%	4%	4%	5%	
Still Open	0%	1%	1%	1%	4%	8%	6%	18%	12%	20%	29%	48%	13%	
Grand Total	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	

D. The Number and Percentage of Complaints Resolved by taking the following actions:														
Count of Incident ID	Month													
Row Labels	1	2	3	4	5	6	7	8	9	10	11	12	Grand Total	
Commercial	2	1	5	8	5	5	3	6	1	2	8	4	50	
Action Not In Control Of Utility				1	1			1	1		1		5	
Refuse Action Cust Requested			1	3									4	
Take Action Cust and Utility Agree Upon	1	1	4	4	3	2	2	3			2	2	24	
Take Action Customer Request	1					2		1			1		5	
Still Open					1	1	1	1		2	4	2	12	
Industrial									1		1		2	
Take Action Cust and Utility Agree Upon											1		1	
Take Action Customer Request									1				1	
Residential	81	93	82	112	217	276	225	251	161	197	120	114	1,929	
Action Not In Control Of Utility	6	11	10	10	30	26	5	35	17	20	16	11	197	
Refuse Action Cust Requested	7	11	7	13	5	12	13	11	5	9	5	1	99	
Take Action Cust and Utility Agree Upon	61	53	53	79	166	206	183	136	87	94	45	41	1,204	
Take Action Customer Request	7	17	11	9	9	11	10	25	32	38	19	8	196	
Still Open		1	1	1	7	21	14	44	20	36	35	53	233	
Grand Total	83	94	87	120	222	281	228	257	163	199	129	118	1,981	

Count of Incident ID	Month													
Row Labels	1	2	3	4	5	6	7	8	9	10	11	12	Grand Total	
Commercial	2%	1%	6%	7%	2%	2%	1%	2%	1%	1%	6%	3%	3%	
Action Not In Control Of Utility	0%	0%	0%	13%	20%	0%	0%	17%	100%	0%	13%	0%	10%	
Refuse Action Cust Requested	0%	0%	20%	38%	0%	0%	0%	0%	0%	0%	0%	0%	8%	
Still Open	0%	0%	0%	0%	20%	20%	33%	17%	0%	100%	50%	50%	24%	
Take Action Cust and Utility Agree Upon	50%	100%	80%	50%	60%	40%	67%	50%	0%	0%	25%	50%	48%	
Take Action Customer Request	50%	0%	0%	0%	0%	40%	0%	17%	0%	0%	13%	0%	10%	
Industrial	0%	0%	0%	0%	0%	0%	0%	0%	1%	0%	1%	0%	0%	
Take Action Cust and Utility Agree Upon									0%		100%		50%	
Take Action Customer Request									100%		0%		50%	
Residential	98%	99%	94%	93%	98%	98%	99%	98%	99%	99%	93%	97%	97%	
Action Not In Control Of Utility	7%	12%	12%	9%	14%	9%	2%	14%	11%	10%	13%	10%	10%	
Refuse Action Cust Requested	9%	12%	9%	12%	2%	4%	6%	4%	3%	5%	4%	1%	5%	
Still Open	0%	1%	1%	1%	3%	8%	6%	18%	12%	18%	29%	46%	12%	
Take Action Cust and Utility Agree Upon	75%	57%	65%	71%	76%	75%	81%	54%	54%	48%	38%	36%	62%	
Take Action Customer Request	9%	18%	13%	8%	4%	4%	4%	10%	20%	19%	16%	7%	10%	
Grand Total	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	



E. The Number of Complaints forwarded to the Utility by the Commission's Consumer Affairs Office for Further Investigation and Action

CommissionCommission

Count of Incident ID	Month												Grand Total
Row Labels	1	2	3	4	5	6	7	8	9	10	11	12	
Commercial	2		5	5	3	3	1	3		2	4	3	31
Commission	2		5	5	3	3	1	3		2	4	3	31
Industrial									1				1
Commission									1				1
Residential	48	49	51	73	170	223	174	189	119	154	97	89	1,436
BBB/Commission		1	1			1		1			1		5
Commission	47	47	48	70	167	221	171	184	117	150	94	86	1,402
Commission/BBB										2			2
Commission/BBB/OAG								1					1
Commission/Internal										1			1
Commission/Internal/OAG				1									1
Commission/OAG	1		2	2	2		3	3	2	1	2	2	20
Commission/OAG/Officer					1								1
Commission/Officer		1				1						1	3
Grand Total	50	49	56	78	173	226	175	192	120	156	101	92	1,468

Customer Complaint Report

2024 Annual

	Agree	Compromise	Demonstrate	Refuse	Total	%	Turnaround Days for Closing a Complaint		
							Initial Inquiry	within 10 days	Longer than 10 days
Commercial									
Billing Errors	3,697	3	33	2	3,735	81.62%	3,702	32	1
Complaint	0	0	0	0	0	0.00%	0	0	0
High Bill	91	1	0	0	92	2.01%	91	1	0
Inaccurate Metering	128	0	0	0	128	2.80%	128	0	0
Inadequate Service	518	1	2	1	522	11.41%	517	5	0
MR-Special Call Cntr	0	0	0	0	0	0.00%	0	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	42	0	2	0	44	0.96%	44	0	0
Wrongful Disconnect	53	0	2	0	55	1.20%	55	0	0
Total Commercial	4,529	5	39	3	4,576		4,537	38	1
Total Commercial Percentage	98.97%	0.11%	0.85%	0.07%					
Industrial									
Billing Errors	931	2	5	0	938	938.00%	930	8	0
Complaint	0	0	0	0	0	0.00%	0	0	0
High Bill	8	0	0	0	8	8.00%	8	0	0
Inaccurate Metering	13	0	0	0	13	13.00%	13	0	0
Inadequate Service	130	1	0	0	131	131.00%	130	1	0
MR-Special Call Cntr	0	0	0	0	0	0.00%	0	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	10	1	0	0	11	11.00%	11	0	0
Wrongful Disconnect	8	1	0	0	9	9.00%	9	0	0
Total Industrial	1100	5	5	0	1110		1,101	9	0
Total Industrial Percentage	99.10%	0.45%	0.45%	0.00%					
Residential									
Billing Errors	4,580	32	52	2	4,666	201.29%	4,660	6	0
Complaint	28	2	0	1	31	1.34%	12	19	0
High Bill	55	3	3	2	63	2.72%	63	0	0
Inaccurate Metering	171	3	1	0	175	7.55%	175	0	0
Inadequate Service	29,115	554	552	36	30,257	1305.31%	30,220	36	1
MR-Special Call Cntr	6	0	0	0	6	0.26%	3	3	0
Service Extension	1	0	0	0	1	0.04%	1	0	0
Service Restoration	90	7	11	0	108	4.66%	108	0	0
Wrongful Disconnect	1,031	4	28	2	1,065	45.94%	1,065	0	0
Total Residential	35,077	605	647	43	36,372		36,307	64	1
Total Residential Percentage	96.44%	1.66%	1.78%	0.12%					
Total State of Minnesota	40,706	615	691	46	42,058		41,945	111	2
Total ST of MN Percentage	96.79%	1.46%	1.64%	0.11%					

\* Includes all decoupling calls, complaints of which are reported annually in separate filing on February 1st.

Customer Complaint Report

JANUARY, 2024

	Agree	Compromise	Demonstrate	Refuse	Total	%	Turnaround Days for Closing a Complaint		
							Initial Inquiry	within 10 days	Longer than 10 days
Commercial									
Billing Errors	315	0	1	0	316	78.41%	313	3	0
Complaint	0	0	0	0		0.00%	0	0	0
High Bill	7	0	0	0	7	1.74%	6	1	0
Inaccurate Metering	36	0	0	0	36	8.93%	36	0	0
Inadequate Service	40	0	0	0	40	9.93%	40	0	0
MR-Special Call Cntr	0	0	0	0		0.00%	0	0	0
Service Extension	0	0	0	0		0.00%	0	0	0
Service Restoration	2	0	0	0	2	0.50%	2	0	0
Wrongful Disconnect	2	0	0	0	2	0.50%	2	0	0
Total Commercial	402	0	1	0	403		399	4	0
Total Commercial Percentage	99.75%	0.00%	0.25%	0.00%					
Industrial									
Billing Errors	88	0	1	0	89	89.00%	88	1	0
Complaint	0	0	0	0		0.00%	0	0	0
High Bill	0	0	0	0		0.00%	0	0	0
Inaccurate Metering	3	0	0	0	3	3.00%	3	0	0
Inadequate Service	7	0	0	0	7	7.00%	7	0	0
MR-Special Call Cntr	0	0	0	0		0.00%	0	0	0
Service Extension	0	0	0	0		0.00%	0	0	0
Service Restoration	1	0	0	0	1	1.00%	1	0	0
Wrongful Disconnect	0	0	0	0		0.00%	0	0	0
Total Industrial	99	0	1	0	100		99	1	0
Total Industrial Percentage	99.00%	0.00%	1.00%	0.00%					
Residential									
Billing Errors	245	4	1	0	250	10.79%	250	0	0
Complaint	0	0	0	0		0.00%	0	0	0
High Bill	11	0	1	0	12	0.52%	12	0	0
Inaccurate Metering	55	0	0	0	55	2.37%	55	0	0
Inadequate Service	1,850	40	50	2	1,942	83.78%	1939	3	0
MR-Special Call Cntr	0	0	0	0		0.00%	0	0	0
Service Extension	0	0	0	0		0.00%	0	0	0
Service Restoration	10	0	1	0	11	0.47%	11	0	0
Wrongful Disconnect	47	0	1	0	48	2.07%	48	0	0
Total Residential	2,218	44	54	2	2,318		2,315	3	0
Total Residential Percentage	95.69%	1.90%	2.33%	0.09%					
Total State of Minnesota	2,719	44	56	2	2,821		2,813	8	0
Total ST of MN Percentage	96.38%	1.56%	1.99%	0.07%					

\* Includes all decoupling calls, complaints of which are reported annually in separate filing on February 1st.

Customer Complaint Report

FEBRUARY, 2024

	Agree	Compromise	Demonstrate	Refuse	Total	%	Turnaround Days for Closing a Complaint		
							Initial Inquiry	within 10 days	Longer than 10 days
Commercial									
Billing Errors	376	1	4	0	381	80.04%	379	2	0
Complaint	0	0	0	0		0.00%	0	0	0
High Bill	3	0	0	0	3	0.63%	3	0	0
Inaccurate Metering	29	0	0	0	29	6.09%	29	0	0
Inadequate Service	61	0	0	0	61	12.82%	61	0	0
MR-Special Call Cntr	0	0	0	0		0.00%	0	0	0
Service Extension	0	0	0	0		0.00%	0	0	0
Service Restoration	1	0	0	0	1	0.21%	1	0	0
Wrongful Disconnect	1	0	0	0	1	0.21%	1	0	0
Total Commercial	471	1	4	0	476		474	2	0
Total Commercial Percentage	98.95%	0.21%	0.84%	0.00%					
Industrial									
Billing Errors	93	0	0	0	93	80.87%	93	0	0
Complaint	0	0	0	0		0.00%	0	0	0
High Bill	1	0	0	0	1	0.87%	1	0	0
Inaccurate Metering	2	0	0	0	2	1.74%	2	0	0
Inadequate Service	16	0	0	0	16	13.91%	16	0	0
MR-Special Call Cntr	0	0	0	0		0.00%	0	0	0
Service Extension	0	0	0	0		0.00%	0	0	0
Service Restoration	2	0	0	0	2	1.74%	2	0	0
Wrongful Disconnect	1	0	0	0	1	0.87%	1	0	0
Total Industrial	115	0	0	0	115		115	0	0
Total Industrial Percentage	100.00%	0.00%	0.00%	0.00%					
Residential									
Billing Errors	358	4	4	2	368	14.71%	367	1	0
Complaint	0	0	0	0		0.00%	0	0	0
High Bill	3	0	0	0	3	0.12%	3	0	0
Inaccurate Metering	32	1	0	0	33	1.32%	33	0	0
Inadequate Service	1954	47	37	4	2,042	81.61%	2041	1	0
MR-Special Call Cntr	0	0	0	0		0.00%	0	0	0
Service Extension	0	0	0	0		0.00%	0	0	0
Service Restoration	5	0	2	0	7	0.28%	7	0	0
Wrongful Disconnect	49	0	0	0	49	1.96%	49	0	0
Total Residential	2,401	52	43	6	2,502		2,500	2	0
Total Residential Percentage	95.96%	2.08%	1.72%	0.24%					
Total State of Minnesota	2,987	53	47	6	3,093		3,089	4	0
Total ST of MN Percentage	96.57%	1.71%	1.52%	0.19%					

\* Includes Decoupling Complaints which are reported annually in separate filing on February 1st.

Customer Complaint Report

MARCH, 2024

	Agree	Compromise	Demonstrate	Refuse	Total	%	Turnaround Days for Closing a Complaint		
							Initial Inquiry	within 10 days	Longer than 10 days
Commercial									
Billing Errors	347	0	1	0	348	84.26%	345	3	0
Complaint	0	0	0	0	0	0.00%	0	0	0
High Bill	9	0	0	0	9	2.18%	9	0	0
Inaccurate Metering	7	0	0	0	7	1.69%	7	0	0
Inadequate Service	39	0	0	0	39	9.44%	39	0	0
MR-Special Call Cntr	0	0	0	0	0	0.00%	0	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	0	0	0	0	0	0.00%	0	0	0
Wrongful Disconnect	9	0	1	0	10	2.42%	10	0	0
Total Commercial	411	0	2	0	413		410	3	0
Total Commercial Percentage	99.52%	0.00%	0.48%	0.00%					
Industrial									
Billing Errors	75	0	0	0	75	88.24%	75	0	0
Complaint	0	0	0	0	0	0.00%	0	0	0
High Bill	0	0	0	0	0	0.00%	0	0	0
Inaccurate Metering	0	0	0	0	0	0.00%	0	0	0
Inadequate Service	10	0	0	0	10	11.76%	10	0	0
MR-Special Call Cntr	0	0	0	0	0	0.00%	0	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	0	0	0	0	0	0.00%	0	0	0
Wrongful Disconnect	0	0	0	0	0	0.00%	0	0	0
Total Industrial	85	0	0	0	85		85	0	0
Total Industrial Percentage	100.00%	0.00%	0.00%	0.00%					
Residential									
Billing Errors	499	10	6	0	515	21.83%	514	1	0
Complaint	0	0	0	0	0	0.00%	0	0	0
High Bill	3	1	1	0	5	0.21%	5	0	0
Inaccurate Metering	14	0	0	0	14	0.59%	14	0	0
Inadequate Service	1,647	73	71	2	1,793	76.01%	1,793	0	0
MR-Special Call Cntr	2	0	0	0	2	0.08%	2	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	4	0	0	0	4	0.17%	4	0	0
Wrongful Disconnect	26	0	0	0	26	1.10%	26	0	0
Total Residential	2,195	84	78	2	2,359		2,358	1	0
Total Residential Percentage	93.05%	3.56%	3.31%	0.08%					
Total State of Minnesota	2,691	84	80	2	2,857		2,853	4	0
Total ST of MN Percentage	94.19%	2.94%	2.80%	0.07%					

\* Includes Decoupling Complaints which are reported annually in separate filing on February 1st.

Customer Complaint Report

APRIL, 2024

							Turnaround Days for Closing a Complaint		
	Agree	Compromise	Demonstrate	Refuse	Total	%	Initial Inquiry	within 10 days	Longer than 10 days
<b>Commercial</b>									
Billing Errors	285	0	2	0	287	82.00%	283	4	0
Complaint	0	0	0	0	0	0.00%	0	0	0
High Bill	6	0	0	0	6	1.71%	6	0	0
Inaccurate Metering	11	0	0	0	11	3.14%	11	0	0
Inadequate Service	35	0	1	0	36	10.29%	36	0	0
MR-Special Call Cntr	0	0	0	0	0	0.00%	0	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	5	0	0	0	5	1.43%	5	0	0
Wrongful Disconnect	5	0	0	0	5	1.43%	5	0	0
Total Commercial	347	0	3	0	350		346	4	0
Total Commercial Percentage	99.14%	0.00%	0.86%	0.00%					
<b>Industrial</b>									
Billing Errors	74	0	0	0	74	82.22%	74	0	0
Complaint	0	0	0	0	0	0.00%	0	0	0
High Bill	2	0	0	0	2	2.22%	2	0	0
Inaccurate Metering	2	0	0	0	2	2.22%	2	0	0
Inadequate Service	10	0	0	0	10	11.11%	10	0	0
MR-Special Call Cntr	0	0	0	0	0	0.00%	0	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	0	0	0	0	0	0.00%	0	0	0
Wrongful Disconnect	2	0	0	0	2	2.22%	2	0	0
Total Industrial	90	0	0	0	90		90	0	0
Total Industrial Percentage	100.00%	0.00%	0.00%	0.00%					
<b>Residential</b>									
Billing Errors	367	2	5	0	374	13.25%	374	0	0
Complaint	0	0	0	0	0	0.00%	0	0	0
High Bill	2	0	0	0	2	0.07%	2	0	0
Inaccurate Metering	9	1	0	0	10	0.35%	10	0	0
Inadequate Service	2,258	66	55	0	2,379	84.27%	2,378	1	0
MR-Special Call Cntr	1	0	0	0	1	0.04%	1	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	4	1	0	0	5	0.18%	5	0	0
Wrongful Disconnect	51	0	1	0	52	1.84%	52	0	0
Total Residential	2,692	70	61	0	2,823		2,822	1	0
Total Residential Percentage	95.36%	2.48%	2.16%	0.00%					
Total State of Minnesota	3,129	70	64	0	3,263		3,258	5	0
Total ST of MN Percentage	95.89%	2.15%	1.96%	0.00%					

\* Includes Decoupling Complaints which are reported annually in separate filing on February 1st.

Customer Complaint Report

MAY, 2024

	Agree	Compromise	Demonstrate	Refuse	Total	%	Turnaround Days for Closing a Complaint		
							Initial Inquiry	within 10 days	Longer than 10 days
Commercial									
Billing Errors	276	0	2	1	279	82.06%	277	2	0
Complaint	0	0	0	0	0	0.00%	0	0	0
High Bill	5	1	0	0	6	1.76%	6	0	0
Inaccurate Metering	10	0	0	0	10	2.94%	10	0	0
Inadequate Service	31	0	0	0	31	9.12%	31	0	0
MR-Special Call Cntr	0	0	0	0	0	0.00%	0	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	3	0	1	0	4	1.14%	4	0	0
Wrongful Disconnect	10	0	0	0	10	2.86%	10	0	0
Total Commercial	335	1	3	1	340		338	2	0
Total Commercial Percentage	98.53%	0.29%	0.88%	0.29%					
Industrial									
Billing Errors	70	0	1	0	71	83.53%	70	1	0
Complaint	0	0	0	0	0	0.00%	0	0	0
High Bill	2	0	0	0	2	2.35%	2	0	0
Inaccurate Metering	2	0	0	0	2	2.35%	2	0	0
Inadequate Service	8	0	0	0	8	9.41%	8	0	0
MR-Special Call Cntr	0	0	0	0	0	0.00%	0	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	0	1	0	0	1	1.18%	1	0	0
Wrongful Disconnect	1	0	0	0	1	1.18%	1	0	0
Total Industrial	83	1	1	0	85		84	1	0
Total Industrial Percentage	97.65%	1.18%	1.18%	0.00%					
Residential									
Billing Errors	351	2	3	0	356	11.00%	354	2	0
Complaint	3	0	0	0	3	0.09%	1	2	0
High Bill	0	0	0	1	1	0.03%	1	0	0
Inaccurate Metering	16	0	0	0	16	0.49%	16	0	0
Inadequate Service	2,512	70	101	5	2,688	83.07%	2,688	0	0
MR-Special Call Cntr	0	0	0	0	0	0.00%	0	0	0
Service Extension	0	0	0	0	0	0.00%	-	0	0
Service Restoration	3	0	1	0	4	0.12%	4	0	0
Wrongful Disconnect	157	1	10	0	168	5.19%	168	0	0
Total Residential	3,042	73	115	6	3,236		3,232	4	0
Total Residential Percentage	94.00%	2.26%	3.55%	0.19%					
Total State of Minnesota	3,460	75	119	7	3,661		3,654	7	0
Total ST of MN Percentage	94.51%	2.05%	3.25%	0.19%					

\* Includes Decoupling Complaints which are reported annually in separate filing on February 1st.

Customer Complaint Report

JUNE, 2024

	Agree	Compromise	Demonstrate	Refuse	Total	%	Turnaround Days for Closing a Complaint		
							Initial Inquiry	within 10 days	Longer than 10 days
Commercial									
Billing Errors	262	1	4	0	267	85.58%	263	4	0
Complaint	0	0	0	0	0	0.00%	0	0	0
High Bill	7	0	0	0	7	2.24%	7	0	0
Inaccurate Metering	5	0	0	0	5	1.60%	5	0	0
Inadequate Service	28	0	0	0	28	8.97%	28	0	0
MR-Special Call Cntr	0	0	0	0	0	0.00%	0	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	2	0	0	0	2	0.64%	2	0	0
Wrongful Disconnect	2	0	1	0	3	0.96%	3	0	0
Total Commercial	306	1	5	0	312		308	4	0
Total Commercial Percentage	98.08%	0.32%	1.60%	0.00%					
Industrial									
Billing Errors	71	0	1	0	72	90.00%	71	1	0
Complaint	0	0	0	0	0	0.00%	0	0	0
High Bill	1	0	0	0	1	1.25%	1	0	0
Inaccurate Metering	1	0	0	0	1	1.25%	1	0	0
Inadequate Service	3	0	0	0	3	3.75%	3	0	0
MR-Special Call Cntr	0	0	0	0	0	0.00%	0	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	0	0	0	0	0	0.00%	0	0	0
Wrongful Disconnect	3	0	0	0	3	3.75%	3	0	0
Total Industrial	79	0	1	0	80		79	1	0
Total Industrial Percentage	98.75%	0.00%	1.25%	0.00%					
Residential									
Billing Errors	481	2	5	0	488	16.42%	486	2	0
Complaint	4	0	0	0	4	0.13%	0	4	0
High Bill	1	0	1	1	3	0.10%	3	0	0
Inaccurate Metering	10	0	0	0	10	0.34%	10	0	0
Inadequate Service	2254	25	44	6	2,329	78.36%	2328	1	0
MR-Special Call Cntr	0	0	0	0	0	0.00%	0	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	8	1	1	0	10	0.34%	10	0	0
Wrongful Disconnect	122	1	4	1	128	4.31%	128	0	0
Total Residential	2,880	29	55	8	2,972		2,965	7	0
Total Residential Percentage	96.90%	0.98%	1.85%	0.27%					
Total State of Minnesota	3,265	30	61	8	3,364		3,352	12	0
Total ST of MN Percentage	97.06%	0.89%	1.81%	0.24%					

\* Includes Decoupling Complaints which are reported annually in separate filing on February 1st.



Customer Complaint Report

JULY, 2024

	Agree	Compromise	Demonstrate	Refuse	Total	%	Turnaround Days for Closing a Complaint		
							Initial Inquiry	within 10 days	Longer than 10 days
Commercial									
Billing Errors	306	1	3	0	310	84.24%	308	2	0
Complaint	0	0	0	0	0	0.00%	0	0	0
High Bill	6	0	0	0	6	1.63%	6	0	0
Inaccurate Metering	6	0	0	0	6	1.63%	6	0	0
Inadequate Service	37	1	0	1	39	10.60%	38	1	0
MR-Special Call Cntr	0	0	0	0	0	0.00%	0	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	7	0	0	0	7	1.90%	7	0	0
Wrongful Disconnect	0	0	0	0	0	0.00%	0	0	0
Total Commercial	362	2	3	1	368		365	3	0
Total Commercial Percentage	98.37%	0.54%	0.82%	0.27%					
Industrial									
Billing Errors	58	0	0	0	58	82.86%	56	2	0
Complaint	0	0	0	0	0	0.00%	0	0	0
High Bill	0	0	0	0	0	0.00%	0	0	0
Inaccurate Metering	0	0	0	0	0	0.00%	0	0	0
Inadequate Service	12	0	0	0	12	17.14%	12	0	0
MR-Special Call Cntr	0	0	0	0	0	0.00%	0	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	0	0	0	0	0	0.00%	0	0	0
Wrongful Disconnect	0	0	0	0	0	0.00%	0	0	0
Total Industrial	70	0	0	0	70		68	2	0
Total Industrial Percentage	100.00%	0.00%	0.00%	0.00%					
Residential									
Billing Errors	224	2	6	0	232	7.17%	232	0	0
Complaint	3	0	0	0	3	0.09%	0	3	0
High Bill	2	0	0	0	2	0.06%	2	0	0
Inaccurate Metering	6	0	1	0	7	0.22%	7	0	0
Inadequate Service	2,751	40	40	3	2,834	87.55%	2,831	3	0
MR-Special Call Cntr	2	0	0	0	2	0.06%	0	2	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	9	1	1	0	11	0.34%	11	0	0
Wrongful Disconnect	142	0	4	0	146	4.51%	146	0	0
Total Residential	3,139	43	52	3	3,237		3,229	8	0
Total Residential Percentage	96.97%	1.33%	1.61%	0.09%					
Total State of Minnesota	3,571	45	55	4	3,675		3,662	13	0
Total ST of MN Percentage	97.17%	1.22%	1.50%	0.11%					

\* Includes Decoupling Complaints which are reported annually in separate filing on February 1st.

Customer Complaint Report

AUGUST, 2024

	Agree	Compromise	Demonstrate	Refuse	Total	%	Turnaround Days for Closing a Complaint		
							Initial Inquiry	within 10 days	Longer than 10 days
Commercial									
Billing Errors	341	0	2	0	343	84.90%	339	3	1
Complaint	0	0	0	0	0	0.00%	0	0	0
High Bill	13	0	0	0	13	3.22%	13	0	0
Inaccurate Metering	9	0	0	0	9	2.23%	9	0	0
Inadequate Service	32	0	0	0	32	7.92%	32	0	0
MR-Special Call Cntr	0	0	0	0	0	0.00%	0	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	4	0	1	0	5	1.24%	5	0	0
Wrongful Disconnect	2	0	0	0	2	0.50%	2	0	0
Total Commercial	401	0	3	0	404		400	3	1
Total Commercial Percentage	99.26%	0.00%	0.74%	0.00%					
Industrial									
Billing Errors	94	0	1	0	95	83.33%	95	0	0
Complaint	0	0	0	0	0	0.00%	0	0	0
High Bill	1	0	0	0	1	0.88%	1	0	0
Inaccurate Metering	1	0	0	0	1	0.88%	1	0	0
Inadequate Service	14	1	0	0	15	13.16%	14	1	0
MR-Special Call Cntr	0	0	0	0	0	0.00%	0	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	2	0	0	0	2	1.75%	2	0	0
Wrongful Disconnect	0	0	0	0	0	0.00%	0	0	0
Total Industrial	112	1	1	0	114		113	1	0
Total Industrial Percentage	98.25%	0.88%	0.88%	0.00%					
Residential									
Billing Errors	291	0	3	0	294	9.38%	294	0	0
Complaint	5	0	0	0	5	0.16%	4	1	0
High Bill	2	1	0	0	3	0.10%	3	0	0
Inaccurate Metering	10	0	0	0	10	0.32%	10	0	0
Inadequate Service	2,619	52	27	4	2,702	86.22%	2,698	3	1
MR-Special Call Cntr	0	0	0	0	0	0.00%	0	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	18	1	1	0	20	0.64%	20	0	0
Wrongful Disconnect	97	0	2	1	100	3.19%	100	0	0
Total Residential	3,042	54	33	5	3,134		3,129	4	1
Total Residential Percentage	97.06%	1.72%	1.05%	0.16%					
Total State of Minnesota	3,555	55	37	5	3,652		3,642	8	2
Total ST of MN Percentage	97.34%	1.51%	1.01%	0.14%					

\* Includes Decoupling Complaints which are reported annually in separate filing on February 1st.

Customer Complaint Report

SEPTEMBER, 2024

	Agree	Compromise	Demonstrate	Refuse	Total	%	Turnaround Days for Closing a Complaint		
							Initial Inquiry	within 10 days	Longer than 10 days
Commercial									
Billing Errors	306	0	3	0	309	86.07%	308	1	0
Complaint	0	0	0	0	0	0.00%	0	0	0
High Bill	6	0	0	0	6	1.67%	6	0	0
Inaccurate Metering	2	0	0	0	2	0.56%	2	0	0
Inadequate Service	35	0	0	0	35	9.75%	35	0	0
MR-Special Call Cntr	0	0	0	0	0	0.00%	0	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	5	0	0	0	5	1.39%	5	0	0
Wrongful Disconnect	2	0	0	0	2	0.56%	2	0	0
Total Commercial	356	0	3	0	359		358	1	0
Total Commercial Percentage	99.16%	0.00%	0.84%	0.00%					
Industrial									
Billing Errors	76	1	0	0	77	84.62%	76	1	0
Complaint	0	0	0	0	0	0.00%	0	0	0
High Bill	0	0	0	0	0	0.00%	0	0	0
Inaccurate Metering	1	0	0	0	1	1.10%	1	0	0
Inadequate Service	10	0	0	0	10	10.99%	10	0	0
MR-Special Call Cntr	0	0	0	0	0	0.00%	0	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	3	0	0	0	3	3.30%	3	0	0
Wrongful Disconnect	0	0	0	0	0	0.00%	0	0	0
Total Industrial	90	1	0	0	91		90	1	0
Total Industrial Percentage	98.90%	1.10%	0.00%	0.00%					
Residential									
Billing Errors	554	3	5	0	562	16.79%	562	0	0
Complaint	5	0	0	1	6	0.18%	2	4	0
High Bill	4	1	0	0	5	0.15%	5	0	0
Inaccurate Metering	9	0	0	0	9	0.27%	9	0	0
Inadequate Service	2621	25	26	2	2,674	79.87%	2669	5	0
MR-Special Call Cntr	0	0	0	0	0	0.00%	0	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	5	2	0	0	7	0.21%	7	0	0
Wrongful Disconnect	83	0	2	0	85	2.54%	85	0	0
Total Residential	3,281	31	33	3	3,348		3,339	9	0
Total Residential Percentage	98.00%	0.93%	0.99%	0.09%					
Total State of Minnesota	3,727	32	36	3	3,798		3,787	11	0
Total ST of MN Percentage	98.13%	0.84%	0.95%	0.08%					

\* Includes Decoupling Complaints which are reported annually in separate filing on February 1st.

Customer Complaint Report

OCTOBER, 2024

	Agree	Compromise	Demonstrate	Refuse	Total	%	Turnaround Days for Closing a Complaint		
							Initial Inquiry	within 10 days	Longer than 10 days
Commercial									
Billing Errors	369	0	1	0	370	80.79%	366	4	0
Complaint	0	0	0	0	0	0.00%	0	0	0
High Bill	9	0	0	0	9	1.97%	9	0	0
Inaccurate Metering	5	0	0	0	5	1.09%	5	0	0
Inadequate Service	61	0	1	0	62	13.54%	60	2	0
MR-Special Call Cntr	0	0	0	0	0	0.00%	0	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	5	0	0	0	5	1.09%	5	0	0
Wrongful Disconnect	7	0	0	0	7	1.53%	7	0	0
Total Commercial	456	0	2	0	458		452	6	0
Total Commercial Percentage	99.56%	0.00%	0.44%	0.00%					
Industrial									
Billing Errors	125	1	0	0	126	88.73%	125	1	0
Complaint	0	0	0	0	0	0.00%	0	0	0
High Bill	0	0	0	0	0	0.00%	0	0	0
Inaccurate Metering	0	0	0	0	0	0.00%	0	0	0
Inadequate Service	14	0	0	0	14	9.86%	14	0	0
MR-Special Call Cntr	0	0	0	0	0	0.00%	0	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	1	0	0	0	1	0.70%	1	0	0
Wrongful Disconnect	1	0	0	0	1	0.70%	1	0	0
Total Industrial	141	1	0	0	142		141	1	0
Total Industrial Percentage	99.30%	0.70%	0.00%	0.00%					
Residential									
Billing Errors	416	1	6	0	423	11.27%	423	0	0
Complaint	3	2	0	0	5	0.13%	4	1	0
High Bill	9	0	0	0	9	0.24%	9	0	0
Inaccurate Metering	5	0	0	0	5	0.13%	5	0	0
Inadequate Service	3111	54	20	4	3,189	84.99%	3179	10	0
MR-Special Call Cntr	0	0	0	0	0	0.00%	0	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	6	0	2	0	8	0.21%	8	0	0
Wrongful Disconnect	110	1	2	0	113	3.01%	113	0	0
		0							
Total Residential	3,660	58	30	4	3,752		3,741	11	0
Total Residential Percentage	97.55%	1.55%	0.80%	0.11%					
Total State of Minnesota	4,257	59	32	4	4,352		4,334	18	0
Total ST of MN Percentage	97.82%	1.36%	0.74%	0.09%					

\* Includes Decoupling Complaints which are reported annually in separate filing on February 1st.

Customer Complaint Report

NOVEMBER, 2024

	Agree	Compromise	Demonstrate	Refuse	Total	%	Turnaround Days for Closing a Complaint		
							Initial Inquiry	within 10 days	Longer than 10 days
Commercial									
Billing Errors	260	0	2	1	263	76.45%	260	3	0
Complaint	0	0	0	0	0	0.00%	0	0	0
High Bill	8	0	0	0	8	2.33%	8	0	0
Inaccurate Metering	3	0	0	0	3	0.87%	3	0	0
Inadequate Service	58	0	0	0	58	16.86%	57	1	0
MR-Special Call Cntr	0	0	0	0	0	0.00%	0	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	3	0	0	0	3	0.87%	3	0	0
Wrongful Disconnect	9	0	0	0	9	2.62%	9	0	0
Total Commercial	341	0	2	1	344		340	4	0
Total Commercial Percentage	99.13%	0.00%	0.58%	0.29%					
Industrial									
Billing Errors	57	0	1	0	58	82.86%	57	1	0
Complaint	0	0	0	0	0	0.00%	0	0	0
High Bill	1	0	0	0	1	1.43%	1	0	0
Inaccurate Metering	1	0	0	0	1	1.43%	1	0	0
Inadequate Service	9	0	0	0	9	12.86%	9	0	0
MR-Special Call Cntr	0	0	0	0	0	0.00%	0	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	1	0	0	0	1	1.43%	1	0	0
Wrongful Disconnect	0	0	0	0	0	0.00%	0	0	0
Total Industrial	69	0	1	0	70		69	1	0
Total Industrial Percentage	98.57%	0.00%	1.43%	0.00%					
Residential									
Billing Errors	423	1	5	0	429	12.08%	429	0	0
Complaint	5	0	0	0	5	0.14%	1	4	0
High Bill	6	0	0	0	6	0.17%	6	0	0
Inaccurate Metering	4	1	0	0	5	0.14%	5	0	0
Inadequate Service	2924	42	36	1	3,003	84.54%	2998	5	0
MR-Special Call Cntr	1	0	0	0	1	0.03%	0	1	0
Service Extension	1	0	0	0	1	0.03%	1	0	0
Service Restoration	5	1	2	0	8	0.23%	8	0	0
Wrongful Disconnect	92	0	2	0	94	2.65%	94	0	0
Total Residential	3,461	45	45	1	3,552		3,542	10	0
Total Residential Percentage	97.44%	1.27%	1.27%	0.03%					
Total State of Minnesota	3,871	45	48	2	3,966		3,951	15	0
Total ST of MN Percentage	97.60%	1.13%	1.21%	0.05%					

\* Includes Decoupling Complaints which are reported annually in separate filing on February 1st.

Customer Complaint Report

DECEMBER, 2024

	Agree	Compromise	Demonstrate	Refuse	Total	%	Turnaround Days for Closing a Complaint		
							Initial Inquiry	within 10 days	Longer than 10 days
Commercial									
Billing Errors	254	0	8	0	262	75.07%	261	1	0
Complaint	0	0	0	0	0	0.00%	0	0	0
High Bill	12	0	0	0	12	3.44%	12	0	0
Inaccurate Metering	5	0	0	0	5	1.43%	5	0	0
Inadequate Service	61	0	0	0	61	17.48%	60	1	0
MR-Special Call Cntr	0	0	0	0	0	0.00%	0	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	5	0	0	0	5	1.43%	5	0	0
Wrongful Disconnect	4	0	0	0	4	1.15%	4	0	0
Total Commercial	341	0	8	0	349		347	2	0
Total Commercial Percentage	97.71%	0.00%	2.29%	0.00%					
Industrial									
Billing Errors	50	0	0	0	50	73.53%	50	0	0
Complaint	0	0	0	0	0	0.00%	0	0	0
High Bill	0	0	0	0	0	0.00%	0	0	0
Inaccurate Metering	0	0	0	0	0	0.00%	0	0	0
Inadequate Service	17	0	0	0	17	25.00%	17	0	0
MR-Special Call Cntr	0	0	0	0	0	0.00%	0	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	0	0	0	0	0	0.00%	0	0	0
Wrongful Disconnect	0	1	0	0	1	1.47%	1	0	0
Total Industrial	67	1	0	0	68		68	0	0
Total Industrial Percentage	98.53%	1.47%	0.00%	0.00%					
Residential									
Billing Errors	371	1	3	0	375	11.95%	375	0	0
Complaint	0	0	0	0	0	0.00%	0	0	0
High Bill	12	0	0	0	12	0.38%	12	0	0
Inaccurate Metering	1	0	0	0	1	0.03%	1	0	0
Inadequate Service	2614	20	45	3	2,682	85.44%	2678	4	0
MR-Special Call Cntr	0	0	0	0	0	0.00%	0	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	13	0	0	0	13	0.41%	13	0	0
Wrongful Disconnect	55	1	0	0	56	1.78%	56	0	0
Total Residential	3,066	22	48	3	3,139		3,135	4	0
Total Residential Percentage	97.67%	0.70%	1.53%	0.10%					
Total State of Minnesota	3,474	23	56	3	3,556		3,550	6	0
Total ST of MN Percentage	97.69%	0.65%	1.57%	0.08%					

\* Includes Decoupling Complaints which are reported annually in separate filing on February 1st.

Average Cost per Physical Disconnect/Reconnect\*

	<u>2022 Costs</u> <u>(Docket 22-233)</u>	<u>2023 Costs</u>	<u>2024 Costs</u>
Pre Lock Call Cost	\$0.53	\$0.56	\$0.57
Post Lock Call Cost	\$3.74	\$3.95	\$4.07
Field Personnel Costs - Disconnects	\$59.75	\$104.28	\$96.05
Field Personnel Costs - Reconnects	\$35.85	\$62.57	\$57.63
*All costs include labor and benefits			
Total Cost	\$99.87	\$171.36	\$158.31

Average Cost per Remote Disconnect/Reconnect\*

	<u>2022 Costs</u> <u>(Docket 22-233)</u>	<u>2023 Costs</u>	<u>2024 Costs</u>
Pre Lock Call Cost	\$0.53	\$0.56	\$0.57
Post Lock Call Cost	\$3.74	\$3.95	\$4.07
Field Personnel Costs - Disconnects	\$8.46	\$14.76	\$13.59
Field Personnel Costs - Reconnects	\$1.08	\$1.88	\$1.73
*All costs include labor and benefits			
Total Cost	\$13.80	\$21.15	\$19.96



### Pre Lock Call Cost

Cost	Amount
Average Wage	\$19.26
Average Handle Time (Hours)	0.09056
Call Time Cost per Call	\$1.74
Handle Time Percentage	52%
Non-Handle Time Cost	\$1.62
Total Cost per Call	\$3.36
Benefits Included (Assume 70.36%)	\$2.37
Total Cost	\$5.73
Calls Answered or Received Call Back	10%
Assume 10% of Calls Answered or Received Call Back	\$0.57

### Post Lock Call Cost

Cost	Amount
Average Wage	\$19.26
Average Handle Time (Hours)	0.08032
Call Time Cost per Call	\$1.55
Handle Time Percentage	52%
Non-Handle Time Cost	\$1.44
Total Cost per Call	\$2.98
Benefits Included (Assume 70.36%)	\$2.10
Total Cost	\$5.08
Calls Answered or Received Call Back	80%
Assume 10% of Calls Answered or Received Call Back	\$4.07

**Average Cost per Physical Disconnect**

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Time	1
Amount of Orders Completed	5,223
Time Multiplier	5,223
O&M	\$294,474
Cost Per Order	\$56.38
Assume 100% of Time Remote Connect Does not Function	\$56.38
Cost Per Visit	\$56.38
Benefits @ 73.60%	\$39.67
Total Cost per Field Visit	\$96.05

### **Average Cost per Remote Disconnect**

	<u>Revised - Reply</u>
	<u>Comments</u>
Time	1
Amount of Orders Completed	5,223
Time Multiplier	5,223
O&M	\$294,474
Cost Per Order	\$56.38
Benefits @ 70.36%	\$39.67
Total Cost per Order - Physical Disconnect	<u>\$96.05</u>
 <u>Remote Connect Does not Function</u>	
Cost per Physical Disconnect	\$96.05
Percent of Time Remote Connect Does not Function	3%
Cost per All Disconnects	<u>\$2.88</u>
 <u>Incorrect Contact Information</u>	
Total Cost per Order - Physical Disconnect	\$96.05
Minutes - Home Visit and Physical Disconnect	39
Cost per Minute	<u>\$2.46</u>
Minutes - Home Visit and Virtual Disconnect	29
Cost Per Disconnect	<u>\$71.42</u>
Percent of Time Home Visit Needed Due to Incorrect Contact Information	15%
Assume 15% of customers don't have correct phone number	<u>\$10.71</u>
 <b>Total Cost per All Disconnects</b>	 <b>\$13.59</b>

### **Average Cost per Reconnect**

Time	0.6
Amount of Orders Completed	1,633
Time Multiplier	980
O&M	\$55,241
Cost Per Order	\$33.83
Assume 100% of Customers Can't Use Remote Disconnect	\$33.83
Cost Per Visit	\$33.83
Benefits @ 73.60%	\$23.80
Total Cost per Visit	\$57.63

### **Average Cost per Reconnect**

Time	0.6
Amount of Orders Completed	1,633
Time Multiplier	980
O&M	\$55,241
Cost Per Order	\$33.83
Benefits @ 70.36%	\$23.80
Total Cost per Order	\$57.63
Assume 3% of Time Remote Connect Does not Function	\$1.73
<b>Total Cost per Visit</b>	<b>\$1.73</b>

2019 First Call Only Days - 2019 Daily Forecast  
From Customer Care Analytics and WFM

Date	Attempts	Response	Calls
2/7/2019	4,921	8%	399
2/8/2019	12,227	5%	587
2/12/2019	9,195	6%	519
3/14/2019	4,610	15%	701
3/15/2019	4,717	9%	413
4/8/2019	5,786	12%	701
4/9/2019	5,962	8%	500
4/10/2019	9,259	6%	599
4/11/2019	3,336	12%	401
4/12/2019	3,714	18%	669
4/15/2019	7,988	18%	1,436
4/16/2019	5,875	12%	721
4/17/2019	8,828	10%	897
6/11/2019	3,663	11%	419
6/12/2019	3,972	8%	325
9/3/2019	4,371	9%	415
Total	98,424	10%	9,702

2019 First Call Attempts by Month  
From CC Analytic Solutions

2019	Attempts
Jan	126,465
Feb	124,014
Mar	125,274
Apr	122,958
May	99,338
Jun	71,022
Jul	71,823
Aug	74,355
Sep	71,622
Oct	
Nov	107,206
Dec	77,234
Average	97,392

Assumptions	
Call/Linkback Rate	10%
AHT	326
Productivity Factor	52%
YTD ResCRD Scheduled Hrs	131,734
YTD ResCRD Phone Hours	68,319
Avg Wage	\$18.37
	0.090556
Call Time Cost per Call	\$1.66
Productivity Factor	\$3.21
Benefits Included	\$4.58
10%	\$0.46

Cost Estimate

2019	1st Call Attempts	Callback/Linkback	Handle Time (Hrs)	Agent Hours	Labor \$
Jan	126,465	12,466	1,129	2,177	\$39,986
Feb	124,014	12,224	1,107	2,135	\$39,211
Mar	125,274	12,349	1,118	2,156	\$39,610
Apr	122,958	12,120	1,098	2,116	\$38,878
May	99,338	9,792	887	1,710	\$31,409
Jun	71,022	7,001	634	1,222	\$22,456
Jul	71,823	7,080	641	1,236	\$22,709
Aug	74,355	7,329	664	1,280	\$23,510
Sep	71,622	7,060	639	1,233	\$22,646
Oct	97,392	9,600	869	1,676	\$30,794
Nov	107,206	10,568	957	1,845	\$33,897
Dec	77,234	7,613	689	1,329	\$24,420
Annual	1,168,703	115,203	10,432	20,116	\$369,527

2019 Minnesota	January	February	March	April	May	June	July	August	September	October	November	December	Total
Calls Associated with a disconnected account	4,784	4,181	6,915	16,180	9,873	1,290	1,921	3,271	3,695	1,802	2,074	2,570	58,556
Average Handle time for all Credit Calls (seconds)	253	260	276	320	294	298	300	291	288	305	301	284	289



2024 Actual

To be multiplied by Productive Labor only, not full wages

Loading Rates	MN
Non-Prod	23.14%
Pension & Ins	29.70%
Benefits Non-Service	4.70%
Payroll Taxes	12.34%
WC - Ins and Other	0.48%
Annual Incentive	0.00%
	<b>70.36%</b>

## 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-25-27**

Dated this 1<sup>st</sup> day of April 2025

/s/

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Christine Schwartz  
Regulatory Administrator

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Marisa	Bayer	mbayer@edinamn.gov	City of Edina		4801 W 50th St Edina MN, 55424 United States	Electronic Service		No	Official 25-27
2	James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
3	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	Official 25-27
4	Olivia	Carroll	oliviacc@cupminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St W1360 St. Paul MN, 55101 United States	Electronic Service		No	Official 25-27
5	Gabriel	Chan	gabechan@umn.edu			130 Hubert H. Humphrey Center 301 19th Ave S Minneapolis MN, 55455 United States	Electronic Service		No	Official 25-27
6	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	Official 25-27
7	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	Official 25-27
8	Brandon	Crawford	brandonc@cupminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 St. Paul MN, 55101 United States	Electronic Service		No	Official 25-27
9	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	Official 25-27
10	Christopher	Droske	christopher.droske@minneapolismn.gov	Northern States Power Company dba Xcel Energy-Elec		661 5th Ave N Minneapolis MN, 55405 United States	Electronic Service		No	Official 25-27
11	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	Official 25-27
12	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	Official 25-27
13	Shubha	Harris	shubha.m.harris@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401 - FL	Electronic Service		No	Official 25-27

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						8 Minneapolis MN, 55401 United States				
14	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	Official 25-27
15	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	Official 25-27
16	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	Official 25-27
17	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
18	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
19	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	Official 25-27
20	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
21	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	Official 25-27
22	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	Official 25-27
23	Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	Official 25-27
24	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	Official 25-27
25	Tony	Mendoza	tony.mendoza@sierraclub.org	Sierra Club Environmental Law Program		2101 Webster St. 13th Floor Oakland CA, 94612 United States	Electronic Service		No	Official 25-27

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
26	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	Official 25-27
27	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	Official 25-27
28	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
29	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	Official 25-27
30	Scott	Neal	sneal@edinamn.gov	City of Edina		4801 W 50th St Edina MN, 55424 United States	Electronic Service		No	Official 25-27
31	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
32	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	Official 25-27
33	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		No	Official 25-27
34	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	Official 25-27
35	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States	Electronic Service		No	Official 25-27
36	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	Official 25-27
37	George	Shardlow	george@energycents.org	Energy CENTS Coalition		823 E. 7th Street Saint Paul MN, 55106 United States	Electronic Service		No	Official 25-27
38	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	Official 25-27

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
39	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
40	Lauren	Steinheuser	lauren.steinheuser@xcelenergy.com	Northern States Power Company dba Xcel Energy		414 Nicollet Mall, 401-08 Minneapolis MN, 55401 United States	Electronic Service		No	Official 25-27
41	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
42	Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine		225 S 6th St Ste 3500 Capella Tower Minneapolis MN, 55402-4629 United States	Electronic Service		No	Official 25-27
43	Carla	Vita	carla.vita@state.mn.us	MN DEED		Great Northern Building 12th Floor 180 East Fifth Street St. Paul MN, 55101 United States	Electronic Service		No	Official 25-27
44	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
45	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	Official 25-27
46	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27