COMMERCE DEPARTMENT

September 8, 2023

Will Seuffert Executive Secretary Minnesota Public Utilities Commission 121 7th Place East, Suite 350 St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce, Division of Energy Resources Docket No. G002/M-23-77

Dear Mr. Seuffert:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

2022 Annual Natural Gas Service Quality Report submitted by Northern States Power Company, a Minnesota Corporation (Xcel or the Company).

Bridget N. Dockter, Manager, Policy and Outreach, with Xcel Energy filed the Annual Natural Gas Service Quality Performance Report (Report) on May 1, 2023.

The Department recommends the Minnesota Public Utilities Commission (Commission) **accept Xcel's report and modify the Company's future reports.** The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ LOUISE MILTICH Assistant Commissioner of Regulatory Analysis /s/ MARY BETH KEHRWALD Financial Analyst

LM/MBK/ad Attachment

COMMERCE DEPARTMENT

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. G002/M-23-77

I. INTRODUCTION

The Minnesota Public Utilities Commission (Commission) established reporting requirements for natural gas local distribution companies regarding service quality and reliability in 2010 and has adjusted and increased the reporting requirements since that time.¹

A Natural Gas Service Quality Working Group (NGWG) is exploring the reporting requirements for natural gas utility service providers in Docket No. G002/CI-22-548 *In the Matter of an Exploration of Comparative Performance Metrics and Improvements to Natural Gas Service Quality Reports*. This work is on-going and is expected to influence future reporting requirements.

A. INITIAL REPORTING REQUIREMENTS

Table 1 summarizes the first set of reporting requirements identified in *In the Matter of a Commission Investigation into Gas Service Quality Standards,* <u>Docket No. G999/CI-09-409</u>.

Number	Metric	Requirement		
1.	Call center response times	Percentage of calls answered within 20 seconds.		
2.	Meter reading performance data included in Minn. R. 7826.1400 ²	The number and percentage of customer meters read by: 1) utility personnel, 2) by self-read customers, and customer meters that have not been read by utility personnel for periods of six to 12 months and longer than 12 months and data on meter-reading staffing levels by work center or geographical area		
3.	Involuntary service disconnection data as referenced under Minn. Stat. § <u>216B.091</u> and <u>216B.096</u> , subd. 11 in lieu of reporting data on involuntary service disconnections contained in Minn. R. 7826.1500, items A and B	Detailed monthly reports on residential service disconnections with additional requirements for the winter season – October through April. Number of customers whose service is disconnected or remains disconnected for nonpayment beginning in October and a weekly report beginning in November with that same information.		

Table 1 – Reporting Requirements included in Docket No. G999/CI-09-409, Order dated August 26, 2010

¹ These requirements are modeled after the electric utility standards contained in Minn. R. 7826.

² The <u>Docket No. G002/M-13-371 Order dated April 7, 2014</u> updated the required meter reading data to provide complete and accurate meter reading data with multiple reads excluded.

4.	Service extension request response time data contained in <u>Minn. R.</u> <u>7826.1600</u> , items A and B, except the data reported under Minn. Stat. § 216B.091 and 216B.096, subd. 11 is not required	The number of customers requesting a service extension by customer class, the interval between the date the service was installed and the latter of the customer-requested in- service date or the date the premises were ready for service, and the number of customers requesting service at a location previously served by the utility and the intervals between the date service as installed and the later of the in- service dates listed above.
5.	Customer deposit data identified in Minn. R. 7826.1900	Must include the number of customers who were required to make a deposit as a condition of receiving service.
6.	Customer complaint data contained in Minn. R. 7826.2000 ³	See rules language for full detail.
7.	Gas emergency phone line calls telephone answer time	Telephone answer time.
8.	Mislocates data - Xcel is allowed to include both gas and electric in its report.	Also includes the number of times a line is damaged due to mismarked line or failure to mark a line.
9.	Gas lines damaged data	Categorized as to cause – 1) utility employees or contractors or 2) unplanned causes.
10.	Service interruptions	Categorized as to cause – 1) caused by utility employees or contractors or 2) any other unplanned cause.
11.	Summary of major events that are immediately reportable to the Minnesota Office of Pipeline Safety (MnOPS) in annual report	Shall provide summaries of all service interruptions caused by service integrity pressure issues.
12.	Contemporaneous MnOPS events to Commission and Department	Location and cause of event, the number of customers affected, the expected duration of the event and an estimate of when service will be restored.
13.	Gas emergency response times	Percentages of emergencies responded to within one hour and within more than one hour.
14.	Customer-service related operations and maintenance expenses	Minnesota-regulated, customer-service expenses and shall be based on costs in FERC accounts 901 and 903 plus payroll taxes and benefits.

B. ADDITIONAL REPORTING REQUIREMENTS

Shortly thereafter, in its <u>November 30, 2010 Order</u> in Docket Nos. E,G002/M-09-224 and G002/CI-08-871 the Commission included additional reporting requirements for Xcel's natural gas utility. Those requirements focused on how the Company handled field orders. Table 2 (see below) lists those requirements.

At that juncture the Commission began a process of refining the information Xcel provided in the 15 different reporting requirements. For example, in an <u>Order dated March 6, 2012</u> in Docket No. G002/M-11-360 *et al.*, the Commission directed all regulated Minnesota gas utilities to provide additional information on the following topics – 1) call center response times, 2) estimated meter reads, 3) service extension requests, 4) customer

³ On Petition, page 11, the Company provides an overview of work group developments to further break out inadequate service in reports beginning with the 2023 Gas Service Quality Report.

deposits, 5) MnOPS emergency calls, and 6) call center complaints. Table 3 lists those additional requirements relative to the original metrics.

Table 2 – Reporting Requirements included in Docket Nos. E,G002/M-09-224 and G002/CI-08-871in Order dated November 30, 2010

Number	Metric	Requirement	
15.	Field Orders	Volume of Investigation and Remediate	
		Volume of Investigate and Refer	
		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	
		Volume of excluded field orders	

Table 3 – Refinement of Reporting Requirements included in Docket No. G002/M-11-360 *et. al* for Xcel Energy⁴

Number	Metric	Requirement
from Table 1		
1.	Call Center Response Times	Include average speed-of-answering calls data in addition to
		reporting on the percentage of calls answered within 20
		seconds or less.
2.	Meter Reading	Explain whether the difference between the total percentage
		of meters (100%) and the percentage of meters read (by both
		the utility and customers) is equal to the percentage of
		estimated meter reads.
4.	Service Extensions	Require reporting on the types of extension requests for both
		locations previously and not previously served.
5.	Customer Deposits	Required reporting of the different types of deposits included
		in the reported number of "required customer deposits."
6.	Customer Complaints	Reconcile gas-related call center complaints with the
		categories contained in Minn. R. 7826.2000.
10.	Service Interruptions	Required additional reporting on whose service was
		interrupted and the average duration of the interruptions.

The Commission provided further refinement to this list in its <u>April 7, 2014 Order</u> in Docket No. E,G002/M-13-371. This Order required Xcel to provide complete and accurate meter-reading data with multiple reads excluded in future reports.

The Commission's <u>April 12, 2019 Order</u> in Docket No. G-002/M-18-316 required Xcel to provide additional information in the Company's 2018 report:

- a. The utility's filing under 49 C.F.R. § 192.1007(e): integrity management plan performance measures; monitoring results; and evaluation of effectiveness in a manner to establish a baseline for ongoing reporting.
- b. A summary of any 2018 emergency response violations cited by MnOPS along with a description of the violation and remediation in each circumstance.

⁴ The <u>Docket No. G002/M-11-360 Order dated March 6, 2012</u> also established additional reporting requirements related to gas emergency response times from MnOps reports; these requirements are excluded from Table 3 as they were removed in the <u>Docket No. G002/M-21-301 Order dated August 5, 2022</u>.

- c. The number of violation letters received by the utility from MnOPS during the year in question.
- d. A discussion of how to provide ongoing monitoring and metrics towards the deployment of Excess Flow Valves (EFV) and manual service line shutoff valves pursuant to the Commission's <u>Order in Docket No. G-999/CI-18-41</u>.

The Commission's <u>November 14, 2019 Order</u> In the Matter of Xcel Energy's Natural Gas Service Quality Report for 2018 in Docket No. G002/M-19-305, required Xcel to file:

- a. An update of integrity management plan performance measures; monitoring results; and evaluation of effectiveness;
- b. The uniform reporting metrics for installation of EFV and manual service line shutoff valves, to be developed as follows: By December 6, 2019 after consultation with the other gas utilities obligated to report EFV metrics, shall provide recommendations for uniform reporting of annual and overall EFV and manual shutoff valve installation on their distribution system. The recommendation could include:
 - a. A uniform definition of the number of customers suitable for EFV;
 - b. A uniform definition of the number of customers suitable for manual shut-off valves;
 - c. A uniform metric to be reported as a percentage of customers with installation or both;
 - d. Metrics for the number of customers receiving installations upon request prior to a system upgrade that would require the installation of EFVs.

In the Commission's <u>January 7, 2020 Order</u> in Docket No. G002/M-19-305, the Commission required Xcel to begin annually filing additional information on 1) leak count by facility type and threat, 2) leak count on main by material, and 3) leak count on service by material.

On January 18, 2023, the Commission issued its <u>Order Regarding Utility Customer Complaint Reporting</u> in Docket No. G002/M-22-210. In that Order, the Commission eliminated the standalone Annual Summary of Customer Complaints docket and required utilities to include customer complaint data from <u>Minnesota Rules 7820.0500</u> in their Annual Service Quality reports with data filed as part of <u>Minnesota Rules 7826.2000</u>.

On May 1, 2023, Xcel filed its 2022 Natural Gas Service Quality Performance Report (Report or Petition).

The Department provides its analysis of the Company's 2022 Report below.

II. DEPARTMENT ANALYSIS

Historically, the Department has analyzed the information provided in the annual report in the context of past reports. Overall, the Department identified no major concerns regarding Xcel's 2022 Gas Service Quality Report.

The Department provides further detail on each reporting metric by discussing each separately below.

A. CALL CENTER RESPONSE TIME

The Orders in Docket Nos. G999/CI-09-409 and G002/M-11-360 established the reporting requirements for natural gas providers' call center response time. In accordance with the orders, Xcel may include both gas and electric utility call center answer times in its report.

While Minnesota Rules 7826.1200, Subpart 1 defines call "answers" when an automated call processing system is used, Xcel includes Interactive Voice Response (IVR) calls when reporting call center response times. The Company noted that the current Commission-approved Service Quality Tariffs in the Minnesota Gas Rate Book define "Telephone Response Time" as including calls answered by IVR.⁵

Xcel provided Call Center Response Time in Attachment A of its report and provided supplemental information in their response to the Department's Information Request 1.⁶ This information is summarized in Table 4 below.

		Including IVR Calls ⁷		Excluding IVR Calls ⁸	
Year	Avg. Speed (Seconds) ⁹	# of calls	12 Mo. Avg.	# of calls	12 Mo. Avg.
2013	26	4,009,067	89.0%	1,904,699	75.6%
2014	20	3,758,280	90.0%	1,799,958	78.0%
2015	18	3,743,635	90.9%	1,659,827	78.3%
2016	21	3,579,038	89.9%	1,658,646	75.9%
2017	21	3,222,187	90.1%	1,460,623	76.6%
2018	22	3,042,040	91.1%	1,312,367	77.2%
2019	27	2,882,333	90.8%	1,288,811	76.8%
2020	151	2,555,155	85.8%	997,622	59.4%
2021	191	2,493,516	82.9%	992,533	52.0%
3 Year Average (2019 – 2021)	123	2,643,668	86.5%	1,092,989	62.7%
2022	127	2,663,988	84.6%	1,116,997	58.9%

Table 4 – Call	Center	Response	Time –	All Calls
----------------	--------	----------	--------	-----------

When IVR calls are included, the Company answered 84.6% of calls within 20 seconds. For agent-only calls (excluding IVR calls), the Company answered 58.9% of calls within 20 seconds. June was the lowest performance month for call center response times, reaching a low of 35.6% service level of agent-only calls and November was the highest performance month with a peak of 88.3% of agent-only calls answered within 20 seconds.

The Company's 2022 call center response time represents a modest improvement from 2021 call times. Xcel experienced a significant decline in call center response times in 2020 and 2021 and identified customer service

⁵ <u>Xcel Minnesota Gas Rate Book, Section 6, Sheet No. 7.4</u>, subset 1.9(A)(20) Definition: Telephone Response Time and

^{1.9(}E)(2) Under Performance Measures: Telephone Response Time.

⁶ Department Attachment 1.

⁷ The data on all calls including IVR calls is based on Attachment A, lines 20, 23 and 18. The call 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) per the line 20 note in Attachment A.

⁸The data on service calls excluding IVR calls can be found in Department Attachment 1.

⁹ The Average Speed of Answer is for agent-only calls per Attachment A, line 23.

staffing challenges such as virtual work, employee turnover, absenteeism, and the onboarding timeline for new employees to get up to speed as the major contributors.¹⁰ Xcel states that there is a notable improvement in service level beginning late in the third quarter of 2022 which the Company attributes to actions taken through 2022 to address call center staffing and performance.

The Department acknowledges for 2022, the Company met the call center response time quality reporting requirements, which requires 80% of the calls to be answered in 20 seconds.

B. METER-READING PERFORMANCE

Xcel reported the following metrics for meter-reading performance in Attachment B and the tables provided in this section of its Report, and indicated the Company included complete and accurate meter-reading data with multiple reads excluded as required by the Commission's April 7, 2014 Order in Docket No. E,G002/M-13-371:

- a. The number and percentage of customer meters read by Company 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 Company 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.
- d. Data on monthly meter-reading staffing levels, by work center or geographical area.

In the Commission's May 1, 2023 Order in Docket No. G002/M-22-210, the Commission required Xcel to file a table with its 2022 gas service quality report that displays updated meter reading data which accounts for the reporting error detailed on page five of their 2021 gas service quality report updating all values affected by the error. In the instant Petition, Xcel indicated 2018 – 2022 were the years affected by the error and provided updated data for these years in the Petition's Tables 2 and 3 but noted that those updates to 2022 Industrial customer data were not reflected in Attachment B. The Company's supplemental response to Department Information Request 4 provided the updated industrial data on reasons for not read meters for industrial customers.¹¹

Xcel reported utility personnel read an annual average of 93.89% of customer meters in 2022, while customers read 0.0005%.¹² These rates reflect an increase in not read meters compared to 2021 when Xcel reported an annual average of 99.82% of customer meters, while customer's read 0.002%.¹³

"No Reading Returned" was the most common reason (77.96%) across all customer classes for failure of meters to be read. ¹⁴ The Petition notes that issues affecting automated read performance and meter inventory issues increased the monthly amount of meters that were read manually and meters that were not read in 2022. The supply chain issues inhibited the Company's ability to exchange the meters that were not transmitting. The

¹⁰ Docket Nos. <u>G002/M-22-210 (2021 Service Quality Report)</u> and <u>G002/M-21-301 (2020 Service Quality Report)</u>.

¹¹ Department Attachment 3.

¹² The Department's calculations are based on data provided in Tables A and B, Attachment B page 1 of the 2022 Report.

¹³ The Department's 2021 calculations are based on data provided in Tables A and B, Attachment B page 2 of the <u>2021</u> <u>Report in Docket No. G002/M-22-210</u>.

¹⁴ The Department's calculation is based on meters not read for 6-12 months for all customer classes based on data provided in Attachment B, Table C-1 by customer class and Department Attachment 3, Table C-1 for Industrial customers.

Company expects the number of not read meters to decrease with the conversion to new Advanced Meter Infrastructure (AMI) meters.¹⁵

Xcel provided the number of meters not read by utility personnel in 2022 for 6 to 12 months and for more than 12 months for its Residential, Commercial, Industrial, and Other customer classes which are summarized in Tables 5 and 6 below.¹⁶ In the tables, the Department calculated the three-year average by class and the variance in percentage of the 2022 results from that three-year average.

The 2018 - 2021 Industrial data in Table 5 and Table 6 has been updated based on the correction provided in the 2022 Report.

Year	Residential	Commercial	Industrial	Other	Total
2013	602	335	131	64	1,132
2014	620	304	92	68	1,084
2015	764	310	134	90	1,298
2016	551	240	109	63	963
2017 ¹⁸	540	247	150	48	985
2018 ¹⁹	589	479	283	44	1,395
2019 ²⁰	582	606	163	50	1,401
2020	773	684	116	40	1,613
2021	639	674	158	20	1,491
3 Year Average (2019 – 2021)	665	655	146	37	1,502
2022	2,112	784	91	25	3,012
2022 Variance	218%	20%	(38%)	(32%)	101%

Table 5: Meters Not Read for Longer than 12 Months¹⁷

In 2022, there was a 101% increase in meters which were not read for longer than 12 months for all customers when compared with the three-year average for 2019 to 2021 (46% increase on a per premise basis) with the largest increase in not read meters for Residential customers.²¹

¹⁵ Petition, pages 5-8.

¹⁶ Petition, Table 2.

¹⁷ Ibid.

¹⁸ Department correction: previous department comments did not reflect the Company update to 2017-2019 data that was reported in the <u>Company Reply Comments in Docket No. G002/M-20-460 dated September 3, 2020</u>.

¹⁹ *Ibid*.

²⁰ Ibid.

²¹ The Department's calculations are based on data provided in Tables 2 and 3 of the 2022 Report. The Industrial data for 2018 – 2022 was updated in the 2022 Report.

Year	Residential	Commercial	Industrial	Other	Total
2013	2,600	822	177	79	3,678
2014	5,237	1,178	260	123	6,798
2015	2,508	942	387	113	3,950
2016	2,268	772	167	75	3,282
2017 ²³	1,401	607	191	2	2,201
2018 ²⁴	1,709	703	489	6	2,907
2019 ²⁵	1,678	874	257	11	2,820
2020	1,794	953	135	13	2,895
2021	2,325	809	99	4	3,237
3 Year Average	1,932	879	164	9	2,984
(2019-2021)					
2022	11,765	1,196	125	11	13,097
2022 Variance	509%	36%	(24%)	18%	339%

Table 6: Meters Not Read for Periods of 6 to 12 Months²²

In 2022, the total number of meters not read for periods of 6 to 12 months increased 304.6% compared to 2021 (236.0% on a per premise basis).²⁶ Additionally, as shown in Table 6 above, the 2022 total number of meters not read for periods of 6 to 12 months increased 339% compared to the three-year average for 2019 to 2021.

In response to the Department's Information Request 3, the Company indicated that supply chain issues are beginning to return to a normal level in 2023 and that, barring additional unforeseen supply chain challenges, they anticipate being caught up with meter exchanges and returning to normal meter reading levels by the end of 2024.²⁷

Xcel provided its monthly staffing levels for meter readers by region worked. The Company averaged a total of 12.3 meter-reading staff in 2022, which is a 0.1 decrease from the prior year. Xcel noted that meter reading staffing levels were fully staffed in all areas at the end of 2022.²⁸

The Department acknowledges Xcel fulfilled the meter reading requirements established in the Orders in Docket Nos. G999/CI-09-409, G002/M-11-360, G002/M-13-371, and G002/M-22-210.

Consistent with the Orders in Docket No. E,G002/M-13-371 and G002/M-22-210, the Department asks that Xcel update the data reported in their attachment outlining Meter Reading metrics in future Gas Service Quality Reports (Attachment B in the 2022 report) to ensure the attachment's data reflects all corrections for erroneous duplicate reporting.

²³ Department correction: previous department comments did not reflect the Company update to 2017-2019 data that was reported in the <u>Company Reply Comments in Docket No. G002/M-20-460 dated September 3, 2020</u>.

²² Petition, Table 2.

²⁴ *Ibid*.

²⁵ Ibid.

²⁶ The Department's calculations are based on data provided in Tables 2 and 3 of the 2022 Report.

²⁷ Department Attachment 2.

²⁸ Petition, page 8.

The Department also asks that Xcel begin including annual totals for meter reading data on the number and percentage of customer meters read by utility personnel and customers in future Gas Service Quality Reports (in the 2022 Report, Attachment B's tables A and B).

C. INVOLUNTARY DISCONNECTIONS

The Docket No. G999/CI-09-409 Order required the Company to provide the involuntary disconnections data it reports under Minn. Stat. § 216B.091 and § 216B.096 (Cold Weather Rule reports) with its annual service quality report.²⁹ Table 7 summarizes Xcel's residential customer disconnection statistics:

Year	Customers Receiving Disconnect	Number of Cold Weather Rule (CWR) Requests	% of CWR Requests Granted	Customers Disconnected Involuntarily	Customers Restored within 24	% of Involuntary Disconnections Restored within 24
	Notice				Hours	Hours
2013	1,217,049	126,477	100%	23,493	20,142	86%
2014	1,166,975 ³¹	105,561	100%	25,532	21,860	86%
2015	1,042,775	151,956	100%	26,657	22,452	84%
2016	870,665	130,052	100%	20,584	17,352	84%
2017	747,409	140,943	100%	19,212	13,182	69%
2018	559,011	115,472	100%	17,310	14,474	84%
2019	521,548	92,122	100%	16,693	15,163	91%
2020	222,803 ³²	58,225	100%	2,820	1,622	58%
2021	396,367	80,143 ³³	100%	6,292	5,489	87%
2022	678,664	126,910	100%	8,486	3,189	38%

Table 7: Residential Customer Involuntary Disconnect Information³⁰

The Cold Weather Rule protection that was implemented in March 2020 resulted in a significant decrease in customers receiving disconnections through May 2021 when companies began notifying customers that they would resume service disconnections in August 2021.³⁴ As the Department expected, the number of involuntary disconnections increased significantly in 2022 following the resumption of service disconnections in August 2021.

The 2022 reporting year is the first full calendar year in which Xcel was disconnecting customers for nonpayment since 2019. The disconnection notices in 2022 are higher than the years immediately preceding the pandemic, and it appears that the Company is working through customer arrearages resulting from the suspension of disconnections during the pandemic.

²⁹ Per the Order in Docket No. G999/CI-09-409, Annual Service Quality Reports include the CWR data on involuntary service disconnections that the Company submits via Dockets E,G999/PR-YY-02 where YY references the last two digits of the year being reported (e.g. G999/PR-22-02 for 2022).

³⁰ Petition, Attachment C, pages 1-2.

³¹ Department correction: previous Department Comments reported the 2014 number of customers receiving disconnect notice as 1,168,975. The correct number for this data point is 1,166,975.

³² Department correction: previous Department Comments reported the 2020 number of customers receiving disconnect notice as 222,796. The correct number for this data point is 222,803.

³³ Department correction: previous Department Comments reported the 2021 number of CWR requests as 73,320. The correct number for this data point is 80,143.

³⁴ See <u>Docket No. E,G999/CI-20-375</u>.

The Department notes that the percentage of disconnections that were reconnected within 24 hours declined significantly in 2022. As noted above, the Cold Weather Rule protection that was in place from March 2020 to July 2021 has contributed to increased disconnection notices and disconnections in 2022 compared to recent years. The Department will continue monitoring this value to see if it rebounds to pre-pandemic levels as we move further out from the disconnection moratorium.

The Department concludes the Company met the involuntary disconnection reporting requirements for 2022.

The Department asks that Xcel begin including annual totals for involuntary service disconnection data in future Gas Service Quality Reports (in the 2022 Report, Attachment C).

D. SERVICE EXTENSION REQUEST RESPONSE TIMES

The Company provided the information on service extension request response times as required in the Order in Docket No. G999/CI-09-409 and amended by the Order in Docket No. G002/M-11-360.

Table 8 below summarizes Xcel's service extension information for new service requests for locations not previously served.

	Re	sidential	Commercial		
Year	# of Installations	Avg. # of Days to Complete	# of Installations	Avg. # of Days to Complete	
2013	1,582	0.80	130	0.70	
2014	2,158	1.10	223	0.90	
2015	1,406	0.50	149	1.20	
2016	1,760	0.70	120	1.50	
2017	1,585	1.10	196	1.90	
2018	1,902	6.80	88	7.55	
2019	3,065	9.78	186	10.6	
2020	3,828	5.4	157	5.8	
2021	3,512	5.0	188	7.4	
2022	3,155	3.3	147	19.5	

Table 8: Service Extension Requests – Location Not Previously Served³⁵

For locations not previously served, the number of installations in 2022 for both residential and commercial are down from 2021, and the average number of days to complete extension requests for Commercial customers shows a significant increase from 7.4 days in 2021 to 19.5 days in 2022.

The Company noted that the decrease in new service installations is most likely due to the continuing economic challenges resulting from the pandemic, significant inflationary pressures, and material and supply issues. Xcel anticipates that future years' installations will increase if inflationary pressure subsides, and supply chain issues improve.

The Company noted that installation times are influenced by a variety of factors including weather events, complexity of the work, and job site readiness. In 2022, Xcel continued to experience supply chain constraints

³⁵ Petition, Attachment D.

that have increased lead times for electrical materials by 30%, and identified an ongoing process change influencing installation times. The Company discontinued a process used to drive efficiency and service-lead time reduction efforts due to the manual tracking requirements on their field personal and is exploring creating a new Service Lead-Time reduction process which can utilize more automated methods, but this transition contributed to the increase in lead time experienced in 2022.³⁶

Table 8(a) below summarizes the Company's service extension requests for previously served locations.

10	Table b(a). Service Extension Requests			Jusiy Scived
	Re	sidential	Со	mmercial
Year	# of Installations	Avg. # of Days to Complete	# of Installations	Avg. # of Days to Complete
2018	1,825	1.45	279	1.33
2019	2,454	1.90	302	1.89
2020	328	2.04	134	2.29
2021	647	1.74	118	1.65
2022	796	1.82	173	2.64

Table 8(a): Service Extension Requests – Location Previously Served³⁷

The number of installations for previously served locations for both residential and commercial increased in 2022 compared to 2021 but remains below the pre-pandemic levels of installations. The average number of days to complete reconnections to previously served locations has been more stable over the last five years than for locations not previously served.

The Department concludes Xcel met the service extension reporting requirements for 2022.

³⁶ Petition, page 9. More detail on the process improvement project can also be found in the <u>Company Reply Comments</u> dated June 30, 2023 in Docket No. E002/M-23-73, page 2.

³⁷ Department Attachment 4.

E. CUSTOMER DEPOSITS

The reporting metric for customer deposits is the number of customers required to make a deposit as a condition of receiving service. Xcel reported 237 such accounts for both its natural gas and electric operations in 2022, which is a 59.35% decrease compared to 2021.

Table 9: Customer Deposits					
Year	Deposits	% Change			
2013	652	4.82%			
2014	606	(7.06%)			
2015	365	(39.77%)			
2016	561	53.70%			
2017	314	(44.03%)			
2018	394	25.48%			
2019	486	23.35%			
2020	678	39.51%			
2021	583	(14.01%)			
2022	237	(59.35%)			

Table 9	9:	Customer	Deposits ³⁸
---------	----	----------	-------------------------------

Per the Docket No. G002/M-11-360 Order, the utilities are required to explain the types of deposits included in the reported number of "required customer deposits." Xcel stated it requires deposits from residential customers that have filed for bankruptcy. The Company noted it requests these deposits upon notification of the bankruptcy and not as a condition for reconnection of service. Xcel further stated, once customers file for bankruptcy, their service is begun anew, and the deposit amount is included in their first bills.

The Department acknowledges Xcel fulfilled the of the Docket Nos. G999/CI-09-409 and G002/M-11-360 Orders' customer deposit reporting requirements.

F. DETAILED INFORMATION ABOUT CUSTOMER COMPLAINTS

The reporting metrics for customers complaints are defined in Minnesota Rules 7826.2000.

Table 10 summarizes the customer complaint data that the Company reported were handled by the Company's Customer Advocate Group (CAG). In 2022, the CAG handled 635 electric and natural gas complaints in 2022, 330 of which were forwarded by the Commission's Consumer Affairs Office (CAO).³⁹

³⁸ Petition, page 9.

³⁹ Petition, Attachment E, pages 3-7.

Year	# Handled by CAG	# Forwarded by CAO	% Resolved on Initial Inquiry	% Resolved by Taking Customer- Requested Action	Top Complaint Category
2013	745	94	18.9%	38.3%	Inadequate Service
2014	770	115	16.8%	51.3%	Inadequate Service
2015	789	129	14.3%	29.5%	Inadequate Service
2016	547	102	16.3%	32.7%	Inadequate Service
2017	572	113	18.0%	27.1%	Inadequate Service
2018	664	248	20.6%	26.7%	Inadequate Service
2019	756	390	14.0%	26.7%	Inadequate Service
2020	430	239	14.4%	35.8%	Inadequate Service
2021	484	257	10.7%	31.6%	Inadequate Service
2022	635	330	9.1%	32.0%	Inadequate Service

Table 10: Customer Complaints Handled by CAG⁴⁰

Table 11 provides detail on the Company's call center complaints. Xcel received 22,792 customer complaints to their call center in 2022. Approximately 94% of these complaints were resolved by taking the action the customer requested.

Year	# Handled by Xcel's Call Centers	% Resolved by Taking Customer Action	Top Complaint Category
2013	802,754	96%	Billing Errors
2014	796,982	96%	Billing Errors
2015	797,237	96%	Billing Errors
2016	736,308	97%	Billing Errors
2017	665,739	96%	Billing Errors
2018	624,399	98%	Billing Errors
2019	550,343 ⁴²	99%	Billing Errors
2020	285,557	99%	Billing Errors
2021	34,346	96%	Billing Errors
2022	22,792	94%	Inadequate Service

Table 11: Customer Complaints Handled by Xcel's Call Centers⁴¹

The Department notes that the number of formal complaints handled by the CAG has increased over the last two years while customer complaints handled by Xcel's call centers have decreased significantly. In the Company's Reply Comments dated June 30, 2023 in Docket No. E002/M-23-73, the Company provided an explanation for these changes in complaint rates and methods. Regarding the significant decrease in call center complaints in 2022, the Company advised that the observed decrease in 2022 is attributed to process changes over the last several years which included "no longer recording inquiries that are not actual complaints."⁴³

⁴⁰ Petition, Attachment E, pages 3-6.

⁴¹ The complaint totals are sums of the monthly data provided in Attachment E, pages 8-19 of the Petition.

⁴² Department correction: previous Department Comments reported the total number of complaints as 550,327 for 2019. The correct number for this data point is 550,343.

⁴³ Docket No. E002/M-23-73 Company Reply Comments dated June 30, 2023, page 3.

Per the Docket No. G002/M-11-360 Order, Xcel provided a chart that aligned its customer complaint categories with those contained in Minnesota Rules 7826.2000. The majority of Xcel's complaints fell within the "Inadequate Service" and "Billing Error" categories. The Company notes that beginning with the 2023 Service Quality Report, utilities will provide more detailed descriptions for the "inadequate service" category including: Field/Operations, Customer Service, Programs and Services, and Cold Weather Rule Protection. The Petition also detailed additional future reporting changes that are expected as well as their current progress and anticipated reporting challenges. ⁴⁴

The Commission Order in Docket No. G002/22-210 eliminated the separate, duplicative stand-alone annual customer complaint reporting requirement, so this data is now included only in the Company's annual service quality report.

The Department acknowledges Xcel fulfilled the Docket No. G999/CI-09-409 and G002/M-11-360 Orders' customer complaint reporting requirements.

The Department asks that Xcel begin including annual totals for call center complaint data in future Gas Service Quality Reports (in the 2022 Report, Attachment E monthly data is shown on pages 8-19).

⁴⁴ Petition, pages 11-12.

G. NATURAL GAS EMERGENCY RESPONSE TIMES

The Company provides data on telephone and field emergency response times.

1. Emergency Calls Speed of Answer

Xcel noted in 2022 it answered 87.2% of emergency calls in 20 seconds. The Company reported its average speed of answering emergency line calls for natural gas emergencies by month and year for all its possible sources, including the general customer service line, Business Line, Electric Outage line, and Gas Emergency Line. Xcel also reported the same information for calls directed exclusively to the dedicated Gas Emergency Line. This information is summarized in Table 12.

	# of Gas	Average	# of Gas	Average Response
Year	Emergency	Response Time	Emergency	Time
	Calls	(seconds)	Line Calls	(seconds)
2013	27,669	17	14,431	10
2014	25,426	8	15,754	8
2015	29,064	14	18,567	14
2016	35,921	11	7,146	14
2017	43,037	7	6,995	12
2018	44,303	5	6,698	12
2019	43,204	4	8,078	8
2020	33,349	6	6,636	9
2021	32,561	5	5,449	7
2022	37,357	7	6,195	11

Table 12: Gas Emergency Calls⁴⁵

The Department acknowledges Xcel fulfilled the gas emergency calls reporting requirements of the G999/CI-09-409 Order.

2. Field Emergency Response Times

The Company also reports the response time associated with emergencies requiring a physical presence at the site of the emergency. This metric is the length of time from the initial notification of an emergency to the point qualified emergency response personnel arrive at the incident location. Xcel reported emergency response times by job code and total calls, by calls responded to within one hour or less, and calls responded to in more than one hour. Xcel also provided the average number of minutes necessary for response to an emergency. The Company's emergency gas response time data are summarized in Table 13.

⁴⁵ Petition, Attachment F.

	# of Gas	Average	% of Calls
Year	Emergency	Response Time	Answered in an
	Calls	(minutes)	Hour or Less
2013	13,801	41.73	83%
2014	14,548	40.00	85%
2015	13,587	38.13	87%
2016	12,811	36.82	88%
2017	13,230	38.35	87%
2018	13,500	35.92	92%
2019	15,238	40.11	92%
2020	12,756	33.47	96%
2021	11,965	28.68	97%
2022	13,063	28.09	97%

Table 13: Gas Emergency Response Times⁴⁶

The Department notes Xcel has improved its average response time over the last ten years. In 2013, the Company's average response time was 41.73 minutes and 83% of calls were answered in an hour or less. The 2022 data reflects a 13.64 minute improvement in average response time from 2013 and 97% of calls were answered in an hour or less.

In the Order for Docket No. G002/M-22-210, the Commission eliminated the MnOps data reporting requirement that was established in Docket No. G002/M-11-360.

The Department acknowledges Xcel fulfilled the Docket No. G999/CI-09-409 and the G002/M-11-360 Orders' gas emergency response time reporting requirements, as amended by the G002/M-22-210 Order.

The Department asks that Xcel begin including annual totals for gas emergency response time detail data in future Gas Service Quality Reports (in the 2022 Report, Attachment G).

H. MISLOCATE RATE

The mislocate rate refers to the number of times a gas line is damaged due to a mismarked or unmarked line. The required reporting metric is the total number of mislocates. The Company also provided the number of locate tickets and the number of mislocates per 1,000 locate tickets. Xcel's mislocate data are summarized in Table 14.

⁴⁶ Petition, Attachment G.

Table 14: Misiocates							
Year	# of	# of Locate	Mislocates per				
	Mislocates	Tickets	1,000 Tickets				
2013	57	155,531	0.37				
2014	43	167,578	0.26				
2015	46	179,362	0.26				
2016	41	171,455	0.24				
2017	44	177,703	0.25				
2018	36	185,760	0.19				
2019	46	224,234	0.21				
2020	51	207,803	0.25				
2021	47	204,603	0.23				
2022	50	193,202	0.26				

Table 14: Mislocates⁴⁷

The Department notes that the 2019 to 2022 number of mislocates has not changed significantly. The Department acknowledges Xcel fulfilled the Docket No. G999/CI-09-409 Order's mislocate reporting requirements.

I. GAS SYSTEM DAMAGES

The metric concerning gas system damage indicates the number of incidents caused by Company employees and contractors, or other sources. Xcel's system damage data are summarized in Table 15.

Year	Damage by	Damage by	Total	Miles of Main	Damage/100		
	Xcel	Others			Main Miles		
2013	87	253	340	8,942	3.80		
2014	77	238	315	8,942	3.52		
2015	91	229	320	9,238	3.46		
2016	71	271	342	9,292	3.68		
2017	66	170	236	9,374	2.52		
2018	63	184	247	9,455	2.61		
2019	64	162	226	9,533	2.37		
2020	68	211	279	9,595	2.91		
2021	64	181	245	9,677	2.53		
2022	72	237	309	9,802	3.15		

Table 15: Damaged Gas Lines⁴⁸

In 2022, the Company reported an increase in the rate of damage incidents per 100 miles of main when compared to 2021. The Company reported a rate of 0.73 damage incidents per 100 miles of main caused by Xcel or contractors and 2.42 damage incidents from other causes per 100 miles of main in 2022. The majority of the 2022 increase in the rate of damage incidents per 100 miles of main is attributable to damage incidents caused by others which increased 0.55 in 2022 compared to 2021.

The Department acknowledges Xcel fulfilled the Docket No. G999/CI-09-409 Order's system damage reporting requirements.

⁴⁷ Petition, Attachment H.

⁴⁸ Petition, Attachment I.

J. SERVICE INTERRUPTIONS

1. Natural Gas Service Interruptions

The reporting metrics for natural gas service interruptions are the number of firm customers that experience an unplanned service interruption and the average duration of the event.

Unplanned service interruptions are those due to Xcel employees and contractors, or other unplanned causes. Summarized in Table 16 are Xcel's service interruption data.

	Number of	Number of	Average Duration	Number of	Average Duration of
Year	Homes	Incidents	of Outages	Incidents Caused	Outages Caused
	Affected	Caused by	Caused by Xcel	by Others	by Others
		Xcel	(hours:minutes)		(hours:minutes)
2013	621	26	1:43	238	2:00
2014	1,023	18	2:29	248	2:22
2015	715	32	1:55	263	1:57
2016	606	25	1:34	252	1:50
2017	401	19	0:58	161	1:39
2018 ⁵⁰	942	30	1:35	179	1:58
2019 ⁵¹	3,465	19	1:29	126	1:58
2020	3,741	18	2:11	128	1.36
2021	509	22	2:05	59	2:02
3 Year Average (2019-2021)	1,834	18	1:55	104	1:52
2022 ⁵²	1,307	13	4:48	5	1:24

Table 16: Gas Service Interruption⁴⁹

In 2022, 1,307 homes were affected by 18 gas service interruptions. Of those interruptions, thirteen outages affecting 1,304 homes were caused by Xcel employees and contractors compared to 22 outages affecting 331 homes in 2021.

The number of incidents and homes affected in 2022 is below the recent three-year average, but the 2022 average duration of outages caused by Xcel of 4:48 hours/minutes is more than double the recent average three-year average of 1:55 hours/minutes. The duration of outages due to other causes in 2022 is 1:24 hours/minutes, compared to the recent three-year average of 1:52 hours/minutes. Attachment K of the Petition provides additional detail on Major Incidents that are reflected in this data.

⁴⁹ Petition, Attachment J.

⁵⁰ Gas Service Interruption data for 2018 updated per <u>the Company's Errata filing in Docket No. G002/M-20-460</u>.

⁵¹ Gas Service Interruption data for 2019 updated per <u>the Company's Errata filing in Docket No. G002/M-20-460</u>.

⁵² Department Attachment 5. The Company provided additional detail on service interruption times reported via phone on August 29, 2023. The Company indicates an outage time of 0:00 for outages caused by others with factors outside of the Company's control to resolve. For example, in the event of a fire, the fire department may request the gas be turned off and Xcel must wait for the fire department to authorize service being turned back on.

While the duration of Xcel-caused outages is significantly higher than in recent years, the Department acknowledges that there are several factors, including public safety, that may impact the duration of an outage. The Department will continue to monitor this value and investigate further if outage durations remain elevated.

The Department acknowledges Xcel fulfilled the Docket No. G999/CI-09-409 Order's natural gas service interruption data requirements.

2. Major Incident Reporting

Historically, the Company was required to summarize major events that required a MnOPS report. Those summaries included the ten items MnOPS required in its incident reports. They were:

- The location;
- When the incident occurred;
- How many customers were affected;
- How the company was made aware of the incident;
- The root cause of the incident;
- The actions taken to fix the problem;
- What actions were taken to contact customers;
- Any public relations or media issues;
- Whether the customer or the company relighted; and
- The longest any customer was without gas service during the incident.

Although MnOPS no longer requires this information, Xcel provided a summary for 2022 in Attachment K. The Company reported 18 major events during 2022, which is a decrease from the 2019-2022 three-year average of 26.3 major events. The Company provided a table of data concerning major incidents, which includes all ten items MnOPS formerly required.

The Department acknowledges Xcel fulfilled the Docket No. G999/CI-09-409 Order's incident reporting requirements to the extent possible. The Order in Docket No. G002/M-21-301 removed the MnOps major events reporting requirement that was established in Docket No. G002/M-11-360.

K. CUSTOMER-SERVICE-RELATED EXPENSES

The customer-service-related expenses reporting metric is the total operation and maintenance (O&M) expenses incurred related to customer service. The Report included expenses for operations in Xcel's Minnesota jurisdiction, as well as the total for Northern States Power Company (which includes North Dakota expenses). Table 17 below summarizes Xcel's reported customer-service expenses for its Minnesota jurisdiction.

Year	FERC 901	Associated Payroll	Total			
	and 903	and Tax Benefits				
2013	\$5,799,728	\$431,478	\$6,231,206			
2014	\$5,617,750	\$374,554	\$5,992,304			
2015	\$5,424,808	\$388,260	\$5,813,068			
2016	\$5,317,939	\$381,388	\$5,699,327			
2017	\$5,034,393	\$388,921	\$5,423,314			
2018	\$4,609,709	\$382,521	\$4,992,230			
2019	\$5,199,451	\$306,623	\$5,506,074			
2020	\$5,194,365	\$280,728	\$5,475,093			
2021	\$5,215,715	\$325,626	\$5,541,341			
2022	\$5,443,453	\$393,648	\$5,837,101			

Table 17: Customer-Service Expenses: Minnesota Jurisdiction⁵³

The Company's customer-service expenses in 2022 were 5% higher than the 2021 amount. Xcel noted that the primary drivers of the increase were starting wage increases for hourly employees in customer service-related positions to keep these positions competitive and reduce turnover rates in these roles. The Company also noted that over-time labor costs were higher to ensure appropriate customer service levels amidst staffing challenges in the contact centers.

The Department acknowledges Xcel fulfilled the Docket No. G999/CI-09-409 Order's O&M expense reporting requirements.

L. METER EQUIPMENT MALFUNCTIONS

The Orders in Docket Nos. G002/CI-08-871 and G002/M-13-371 established reporting requirements for Xcel's meter malfunction data for both the electric and gas service that the Company provided. The gas meter malfunction data is summarized in Table 18.

Voor	# of Orders for	Average	# of Exclusions
rear	Gas Weter	Days LU	
	Equipment	Resolve	Access issues
	Malfunctions		
2013	3,286	3.07	608
2014	3,376	3.43	613
2015	2,956	2.94	533
2016	3,966	3.36	399
2017	3,638	3.67	466
2018	3,670	4.05	515
2019	3,626	5.03	619
2020	3,755	4.90	831
2021	3,900	5.44	286
2022	4,679	8.44	321

Table 18: Gas Meter Equipment Malfunction⁵⁴

⁵³ Petition, Attachment L.

⁵⁴ Petition, Attachment M.

The average days to resolve gas meter equipment malfunctions increased to 8.44 days in 2022 from 5.44 days in 2021. The Company noted global supply chain issues experienced in 2021 persist in 2022 as a key factor to this metric. The Company is working to update its automated gas meter reading technology to a Company-owned/operated model which it expects will improve the situation over time.

The Department acknowledges Xcel fulfilled the Docket No. G002/CI-08-871 Order's meter malfunction reporting requirements.

M. ADDITIONAL REPORTING REQUIREMENTS

The Commission's April 12, 2019 Order in Docket No. G002/M-18-316, as amended by the November 14, 2019 Order in Docket No. G002/19-305, requires the Company to provide the following additional information in its annual service quality report.

- 1. Integrity Management Plan Information
 - *i.* The utility's filing under 49 C.F.R. § 192.1007(e): integrity management plan performance measures; monitoring results; and evaluation of effectiveness in a manner to establish a baseline for ongoing reporting.

The Company submitted the United States Department of Transportation Gas Distribution System Annual Report as required by 49 C.F.R. Part 191 as Attachment N of its 2022 Report. The Department has reviewed this report, and hazardous leak data from the report is summarized in the table below.

Tuble 15. Huzaruous Lea								
	Main Lea	ks	Service Lea	aks				
Leak Cause	3-Year Average (2019 - 2021)	2022	3-Year Average (2019 - 2021)	2022				
Corrosion Failure	0.3	0	42.0	22				
Natural Force Damage	6.0	5	35.0	27				
Excavation Damage	73.3	74	237.3	238				
Other Outside Force	5.3	5	33.0	48				
Pipe, Weld, Joint	10.7	16	51.3	40				
Equipment Failure	2.0	9	75.0	62				
Incorrect Operation	0.0	1	1.3	0				
Other Cause	18.3	5	80.0	49				
Hazardous Leak Count	116.0	115	555.0	486				
All Leak Total	177.0	211	1,334.0	1,280				
% of Leaks that were Hazardous	65.5%	54.5%	41.6%	38.0%				

Table 19: Hazardous Leaks Eliminated/Repaired, 3-Year Average and 2022 Counts⁵⁵

The total number of main leaks increased in 2022 compared to the three-year average, while the number of service leaks decreased in 2022 compared to the three-year average. The percent of hazardous leaks out of total leaks has decreased for both mains and services in 2022 compared to the three-year average.

⁵⁵ 2022 data from Petition, Attachment N. Prior years' average calculated from data provided in Docket No. G002/M-22-210 (Attachment O), G002/M-21-301 (Attachment O), and G002/M-20-460 (Attachment P).

Excavation damage and equipment failure were the two most common leak causes for both mains and services in 2022 for all leaks (including non-hazardous leaks), which is consistent with the three-year average leak cause data.

The Department notes that the percentage of unaccounted for gas included in the 2022 Report decreased from 2.78% in 2021 to 1.99% in 2022.

ii. Leak Count Data

Xcel also included summary information regarding leak count by cause which is summarized in Table 20 below.

Leak Cause	Above Ground Facility Leaks	Main Leaks	Service Leaks	Total Leak Count by Cause	Percentage of Total Leaks by Cause
Corrosion Failure	11	0	21	32	2.15%
Natural Force Damage	8	7	27	42	2.82%
Excavation Damage	11	73	235	319	21.40%
Other Outside Force	41	4	24	69	4.63%
Pipe, Weld, Joint	43	25	52	120	8.05%
Equipment Failure	618	12	23	653	43.80%
Incorrect Operation	2	1	0	3	0.20%
Other Cause	184	20	49	253	16.97%
Total	918	142	431	1,491	100.00%

Table 20: Leak Count by Cause - 2022⁵⁶

The Company reported a total of 1,491 leaks in 2022 with the majority being above ground facility leaks. Equipment failure and excavation damage were the leading causes of leaks.

The Company also provided a summary of leak count by material. For both mains and services, Plastic PE was the material associated with the most leaks.⁵⁷

The inclusion of this information is consistent with a requirement included at Order Point 2 in the Commission's January 7, 2020 in Docket No. G002/M-19-305.

2. MnOPS Reports

The Order in Docket No. G002/M-18-316 requires Xcel to provide data on MnOps violations in their annual gas service quality reports.

i. Emergency Response Violations Cited by MnOPS

The Company reported that it did not receive any emergency response violations cited by MnOPS in 2022.

⁵⁶ Petition, Table 5.

⁵⁷ Petition, Tables 5 and 6.

ii. Violation Letters Received from MnOPS

The Company stated it received five violation letters in 2022 which is a significant decrease from the 26 violation letters received from MnOPS in 2021.

N. EXCESS FLOW VALVES (EFV) AND MANUAL SHUT-OFF VALVES

The Commission developed two reporting requirements related to EFVs and manual service line shutoff valves in recent orders. In its Order dated July 31, 2019 in Docket No. G999/CI-18-41, the Commission required Xcel to submit an annual compliance report consistent with Ordering Paragraphs 7a-c from the Commission's August 20, 2018 Order in that same docket.

In its February 23, 2021 Order in this same docket, the Commission required the Company to submit this information in its annual service quality dockets beginning in 2021, rather than in Docket No. G-999/CI-18-41.

Xcel provided this information in the 2022 Report. The Department concludes Xcel complied with these Commission reporting requirements.

The Commission also requested the gas utilities obligated to report EFV metrics provide recommendations for uniform reporting of annual and overall EFV and manual shutoff valve installation on their distribution systems in its Order dated November 19, 2019 in Docket No. G002/M-19-305. Xcel provided information related to the number of customers suitable for EFVs and the number of customers suitable for manual shut-off valves.

The Company provided the data shown in Table 21 and 22 below regarding installation statistics on EFV and manual service shut-off valves by customer class.

Customer Class	Number of Customers Suitable for EFV	Number of Installed EFVs	Percentage of Suitable Customers with EFVs	Number of Customers Unsuitable for EFV
Residential	384,445	157,455	40.96%	66,560
Commercial	17,604	6,351	36.08%	15,885
Industrial	92	38	41.30%	327
Municipal	244	64	26.23%	327
Total	402,385	163,908	40.73%	83,099

Table 21: EFV Installation by Customer Class 2022 Report⁵⁸

The 2022 summary EFV numbers are consistent with those Xcel provided in its 2021 report.

The percentage of suitable customers with EFVs has increased from 38.16% in 2019 to 40.73% in 2022. Absent a Commission requirement, the Department believes these figures will increase slowly over time. The Company stated it does not have a program in place to install Excess Flow Valves (EFVs) or manual shut-off valves on a standalone basis, but rather installations occur on a case-by-case basis when new service lines are installed, existing service lines are repaired or replaced, or a customer requests installation.

⁵⁸ Petition, Table 7.

Customer Class	Number of Customers	Number of	Percentage of Suitable
	Suitable for Shut-off	Installed	Customers with
	Valve	Shut-off Valves	Shut-off Valves
Residential	65,398	191	0.29%
Commercial	15,820	303	1.92%
Industrial	327	7	2.14%
Municipal	327	7	2.14%
Total	81,872	508	0.62%

Table 22: Manual Service Shut-Off Valve Installation by Customer Class⁵⁹

The 2022 manual shut-off valve figures are consistent with the 2021 values. The percentage of suitable customers with shut-off valves has increased from 0.38% in 2019 to 0.62% in 2022. Given the Company's current approach to installing or replacing manual shut-off valves, the Department believes these figures will increase slowly over time.

The Department acknowledges the Company complied with the various requirements included in the Commission Orders listed above.

O. BENCHMARKING

Xcel, along with CenterPoint Energy, Minnesota Energy Resources Corporation, Greater Minnesota Gas, and Great Plains Natural Gas (the Gas Utilities) made a joint filing on October 1, 2021 in response to the Commission's request that the Gas Utilities "identify already existing industry service quality comparisons, what service qualities could be best for comparison, appropriate similar utilities to compare against, and how such a national comparison could be integrated in the future service quality reporting."⁶⁰

In that filing the Gas Utilities delineated their efforts to identify different existing natural gas local distribution benchmarking efforts at the regional or national level. They concluded:

Because the Gas Utilities have not been able to identify any universally reported service quality metrics beyond those regarding safety and reliability, the Gas Utilities are unable to suggest service quality metrics that would be suitable for comparison. Likewise, with the exception of the information in the J.D. Power report, the Gas Utilities are not aware of a means to identify similar utilities to compare against. . .. the Gas Utilities are, quite frankly, at a loss as to how a regional or national comparison could be integrated into future service quality filings.⁶¹

The Department advised the Commission at its agenda meeting on the Gas Utilities 2020 SRSQs on July 15, 2021 that the American Gas Association (AGA) might serve as a clearinghouse for national service quality benchmarking standards. The Department was hoping the AGA would be tracking a sufficient level of information so that it would provide an "off-the-shelf" benchmarking option for the Commission. The Gas Utilities contacted AGA and found they do not provide that service, as noted in the October 1, 2021 *Compliance Filing*.⁶²

⁵⁹ Department Attachment 6.

⁶⁰ <u>Docket No. G002/M-20-460, Order</u> item 2.

⁶¹ Docket No. G022/M-21-301, Compliance Filing – Supplemental Discussion dated October 1, 2021, page 5.

⁶² Docket No. G022/M-21-301, Compliance Filing – Supplemental Discussion dated October 1, 2021, page 3.

The Commission, as part of its *Order* for Docket No. G-002/M-21-301, issued August 5, 2022, included the following:

Delegated authority to the Executive Secretary to implement a working group with regulated Gas Utilities, the Department of Commerce, Minnesota Office of Pipeline Safety (MnOPS), and Commission staff to continue exploring comparative performance metrics.

Docket No. G002/CI-22-548 In the Matter of an Exploration of Comparative Performance Metrics and Improvements to Natural Gas Service Quality Reports established a Natural Gas Service Quality Working Group (NGWG), and the Department is participating in this group.

P. OTHER WEB-BASED SERVICE METRICS

The Department recommended additional information in the electric utilities service reliability and service quality reports related to web-based service metrics during the 2021 reporting cycle. The Department intentionally did not recommend the same data in the 2020 gas reports, as we were being responsive to the Commission's notice in the electric SRSQ dockets. However, as part of its *Order* in Docket No. G002/M-21-301 the Commission requested "the Gas Utilities propose a web-based service metrics similar to that required of electric utilities by September 1, 2022 as a supplemental filing in their 2021 gas service quality report dockets."⁶³

In response to this order, on September 1, 2022, the Gas Utilities, including Xcel Gas, submitted a joint compliance filing in which they outlined their proposed web-based service metrics. The Gas Utilities expect to first report on the below information in their annual service quality reports for 2023, which will be filed in 2024:

Percentage Uptime		[to second decimal]
	General Website	XX.XX%
	Payment Services	XX.XX%
Error Rate Percentage		[to third decimal]
	Payment Services	XX.XXX%

Additional metrics regarding electronic customer interaction:

- Yearly total number of website visits
- Yearly total number of logins via electronic customer communication platforms
- Yearly total number of emails or other customer service electronic communications received
- 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 Minnesota Rules 7826.1700.

Finally, the Gas Utilities explained while they believe their respective technology systems can facilitate this reporting, there may be situations where they cannot use an automated method to pull the data. The Gas Utilities do not believe it would be an appropriate use of resources to hand tabulate metrics. In such cases, they suggest the utility could report the information is unavailable and suggest the utility should be excused from providing that data.⁶⁴

⁶³ <u>Docket No. G002/M-21-301, Order</u> dated August 5, 2022.

⁶⁴ Docket No. G002/M-21-301, Compliance Filing – Supplemental Discussion dated September 1, 2022, page 2.

III. DEPARTMENT RECOMMENDATIONS

Based on its review of Xcel's 2022 Annual Natural Gas Service Quality Report, the Department recommends the Commission accept the 2022 Report.

The Department recommends the following modifications to future reports:

- Consistent with the Orders in Docket No. E,G002/M-13-371 and G002/M-22-210, the Department asks that Xcel update the data reported in their attachment outlining Meter Reading metrics in Gas Service Quality Reports (Attachment B in the 2022 report) going forward to ensure the attachment's data reflects the corrections for erroneous duplicate Industrial reporting that was described on page five of their 2021 gas service quality report.
- The Department also asks that Xcel include annual totals in all attachments providing monthly data going forward. The table below lists the attachments which did not include annual totals in the Petition:

Metric	2022 Report's Attachment
Meter Reading data on the number and percentage of customer meters ready by utility personnel and by customers	Attachment B, Tables A & B
Involuntary Service Disconnection data	Attachment C
Customer Complaints – Customer Complaint Report (Call Center data)	Attachment E, monthly data is shown on pages 8-19
Gas Emergency Response Time Detail	Attachment G

Not Public Document – Not For Public Disclosure Public Document – Not Public Data Has Been Excised Public Document

Xcel Energy		Information Request No.	1
Docket No.:	G002/M-23-77		
Response To:	Minnesota Department of Comm	nerce	
Requestor:	Mary Beth Kehrwald		
Date Received:	August 17, 2023		

Question:

Topic: Call Center Response Time – Business Calls Reference(s): 2022 Report Table 1, Attachment A, 2021 Natural Gas Service Quality Performance Report (Docket No 22-210)

Minnesota Rules 7826.1200 Call Center Response Time sets the requirements for calls answered within 20 seconds. Subpart 1 Calls to Business Office states in part "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."

The Department acknowledges that Xcel has included Interactive Voice Response (IVR) calls in their service performance calculation for more than 15 years as stated in the Company's 2021 Gas Service Quality Report (Docket No 22-210, report page 3-4).

Please provide the following:

- 1.) If the issue of including IVR/automated call response system data in the business calls (subpart 1) service calculation has been considered by the Commission or any work group, please provide the Commission order and/or documentation supporting the inclusion of IVR call data in the business office calls performance metric.
- 2.) Provide the service call performance data excluding IVR calls from 2013 2022 (count of all agent handled calls answered within 20 seconds, count of all agent handled calls, and performance ratio by year).

Response:

 Xcel Energy is the only Minnesota investor-owned utility that currently has service quality related under-performance penalties. These metrics were established between 1998 and 2013, through three extensive settlement processes. The settlement discussions primarily involved the Minnesota Public Utilities Commission (Commission) and Office of Attorney General, but also included other stakeholders.

Department Attachment 1 Docket No. G002/M-23-77 Page 2 of 3

On March 13, 2013 we submitted our most recent QSP Tariff Modifications in Docket Nos. E,G-002/CI-02-2034 & E,G-002/M-12-383 and on August 12, 2013 the Commission approved those modifications. The current approved Service Quality Tariffs in can be found in our <u>Minnesota Gas Rate Book Section 6, Sheet No. 7.4,</u> <u>subset 1.9A (20)</u>. Subset 1.9(A)(20) specifically defines "Telephone Response Time" as including calls answered by IVR. And subpart 1.9(E)(2) details the "Telephone Response Time" metric benchmark (*i.e.,* calls including IVR) as "80 percent of the calls are answered within 20 seconds."

The Company's response to the attached PUC Information Request 1, in Docket E002/M-20-406, Dated September 30, 2020 includes a detailed discussion of IVR inclusion as it pertains to Minnesota Rule 7826, Subparts 1 & 2.

In its December 18, 2020 Order in Docket No. E002/M-20-406, at Order Point 13, the Commission required the company to...in its 2020 service quality reports... explain why interactive voice response is included in reporting for calls answered within the 20-second threshold. In our 2020 Annual Service Quality Reports (gas and electric), Docket Nos. G002/M-21-301 and E002/M-21-237, we provided the following response:

"Regarding the inclusion of interactive voice response (IVR) system calls in our call center metric; as required by Minn. Rule 7826.1700, the Company reports "call center response times, including calls to the business office and calls regarding service interruptions" as combined metric. As authorized under Minn. Rule 7826.1200, Subp. 2, for service interruptions, the metric includes outage calls made to the business office and outage calls handled by the IVR system. Additionally, many customers prefer the IVR system, so it is a priority to make IVR easy to use. By not including these calls, customers are not given consideration for their preferred channel in the metric. Although the reporting on call center response times has evolved organically over time and new lines have been added to Attachment K for transparency, we have used this same approach for reporting for more than 15 years, since Rules 7826.1200 and 7826.1700 became effective. Removing the ability to include IVR handled outage calls in our metric would require a significant increase to the Customer Care operations budget."

The Department's August 16, 2021 comments in Docket E002/M-21-237 stated, "The Department reviewed the information and considers it to be responsive the Commission's request. The Department acknowledges Xcel's fulfillment of the requirement listed in the Orders listed above." The Commission approved our 2020 Gas Service Quality Report on September 2, 2021.

2.) Service Call performance data excluding IVR calls from 2013-2022 and performance ratio by year is provided in Table 1 below.

Department Attachment 1 Docket No. G002/M-23-77 Page 3 of 3

Dkt #	All Calls Offered to Agents	All Calls Answered by Agents within 20 Seconds	Service Level (Agent Only)
13-0371	1,889,191	1,468,668	77.7%
14-0367	1,904,699	1,439,019	75.6%
15-0406	1,799,958	1,403,330	78.0%
16-0382	1,659,827	1,300,341	78.3%
17-0341	1,658,646	1,258,376	75.9%
18-0316	1,460,623	1,118,448	76.6%
19-0305	1,312,367	1,013,030	77.2%
20-0460	1,288,811	990,248	76.8%
21-0301	997,622	592,556	59.4%
22-0210	992,533	516,035	52.0%
23-0077	1,116,997	658,183	58.9%

71 1 1	1
Lable	
1 0010	-

Preparer:	Bridget Dockter
Title:	Manager Policy & Outreach
Department:	NSPM Regulatory
Telephone:	612-337-2096
Date:	August 28, 2023

Karen Hengel Performance Analyst CC Analyst and WFM 651-639-4306

Department Attachment 2 Docket No. G002/M-23-77 Page 1 of 1

Not Public Document – Not For Public Disclosure Public Document – Not Public Data Has Been Excised Public Document

Xcel Energy		Information Request No.	3
Docket No.:	G002/M-23-77		
Response To:	Minnesota Department of Commerce		
Requestor:	Mary Beth Kehrwald		
Date Received:	August 17, 2023		

Question:

Topic: Meter Reading Performance – Not Read Meters Reference(s): 2022 Report Section B and Attachment B

There is a 305% increase in all occurrences of meters not read in 6-12 months (236% increase on a premise basis) and a 102% increase in all occurrences of meters not read in 12+ months (152% increase on a premise basis) in 2022 compared to 2021 based on the updated meter reading data provided in Table 2 and Table 3 of the Company's Report. The most significant increase in meters not read is for Residential Customers.

The report notes that supply chain issues affecting automated read performance and meter inventory issues contributed to the decrease in automated read performance and the Company's inability to receive and exchange meters/modules that were not transmitting (report, pages 6-7).

The Company also described the process for dispatching field personal to read meters that did not automatically report their readings and included a note that "the inability to exchange meters/modules led to an unplanned significant increase in the number of manual read requests that we do not have the staffing resources to cover." The company also noted that meter reading staffing levels were fully staffed in all areas at the end of 2022, and Table 4 showed staffing levels were quite stable throughout 2022.

Please describe if the company anticipates the meter-related supply chain issues persisting and how the company will address this significant increase in meters not read.

Response:

The supply chain issues we encountered in 2022, although not resolved, are beginning to return to a normal level in 2023. We continue to work on the backlog of meter exchanges previously not completed, which will reduce the number of manual reads required. Barring additional unforeseen supply chain challenges, we anticipate being caught up with meter exchanges and returning to normal meter reading levels by the end of 2024.

Preparer:	Cory Trusty
Title:	Performance Analyst
Department:	Meter Reading Support
Telephone:	715-737-7038
Date:	August 28, 2023

Department Attachment 3 Docket No. G002/M-23-77 Page 1 of 3

Not Public Document – Not For Public Disclosure Public Document – Not Public Data Has Been Excised Public Document

Xcel Energy	Supplement Information Request No.	4
Docket No.:	G002/M-23-77	
Response To:	Minnesota Department of Commerce	
Requestor:	Mary Beth Kehrwald	
Date Received:	August 17, 2023	

Question:

Topic: Meter Reading Performance – Corrected Industrial Data Reference(s): Report Table 2, Report Table 3, Attachment B

The Commission's order in Docket No 22-210, required Xcel to file a table with its reporting year 2022 gas service quality report that displays updated meter reading data which accounts for a reporting error affecting industrial meter reading data as described in the Company's 2021 Gas Service Quality Report. The Commission's Order asked Xcel to update all values affected by the reporting error for all years in which the described error occurred.

In the 2022 Report, Xcel provided Table 2 – All Occurrences and Table 3 – All Premises which reports the meters not read for 6-12 Months and 12+ Months by industry on a per year basis from 2018-2022. The report also notes that Attachment B remains consistent with the system generated reporting. In the 2022 report's Attachment B, tables C-1 and C-2 Account Class: Industrial, the tables reflect the industrial reporting figures that are higher than the corrected figures Xcel provided in Table 2 and Table 3.

Please provide updated data on the explanations of why the meters have not been read (the data from Attachment B, tables C-1 and C-2) for Industrial customers for 6-12 months and for 12+ months for the years affected by the reporting error.

Response:

The majority of the instances in the tables have, in fact, been read. The initial mismatch comes in our billing process that identifies certain meters that are missing interval data in the Customer Resource System (CRS) billing system prior to that meter's billing cycle. The actual meter read data is tracked and available in another system called the Itron Enterprise Edition (IEE). This internal processing issue requires our billing department to log an "Interval Read Request Process Tracking Job" (PTJ) with the clarifying note "No Read Required" to push the data from IEE to CRS. This manual "push" fills in the intervals not captured prior to the billing cycle. The "No Read Required" note is designed in our system with logic in place that searches for that exact note to push the data from IEE to CRS and not dispatch a field agent to retrieve [missing] interval data because, as mentioned above, no data is actually missing.

Department Attachment 3 Docket No. G002/M-23-77 Page 2 of 3

This does not impact any other reporting except when the data is pulled for this Service Quality annual report. Interval data is verified to make sure 100 percent of the intervals have been received. If all the interval data is not received, a special read request is issued by billing and will re-request the data from the IEE interval system, which simultaneously creates a special read request for our meter readers. If the data comes back with 100 percent intervals, a site visit is not necessary.

SUPPLEMENT

Please see Attachment A with updated data for section C-1 and C-2, Industrial Class tables, for the years 2018 – 2022.

Preparer:	Cory Trusty
Title:	Performance Analyst
Department:	Meter Reading Support
Telephone:	715-737-7038
Date:	August 28, 2023

Supplement: August 31, 2023

Northern States Power

C-1. The number and percentage of industrial 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.

Account Class: Industrial

All Occ	urrences N	ot Read for	6-12 Mont	:hs	
	2022	2021	2020	2019	2018
ABS MCC Calc Reading	0	1	3	2	0
Bad Key or Code	0	0	1	0	0
Bad Ert	0	1	0	0	0
BUSINESS CLOSED	3	1	3	0	0
Cannot Locate	0	1	0	0	0
Customer Requests Skip	0	0	1	1	1
DEAD REGISTER	9	1	0	2	0
DOOR LOCKED	2	0	0	0	1
GATE PROBLEM	1	4	0	1	1
Handheld Estimate	0	0	3	1	0
KEY NOT AVAILABLE	0	0	0	0	0
METER OFF	3	24	17	16	17
METER REMOVED	2	2	1	0	8
METER WILL NOT PROBE	1	0	0	0	0
No Answer	0	3	2	2	2
Need Key or Code	0	0	0	0	0
NO READING RETURNED	103	58	95	219	454
Non Energized	0	0	2	1	0
Pandemic	0	1	0	0	0
Seasonal	0	0	0	5	3
VACANT	1	2	7	7	2
Total	125	99	135	257	489

Department Attachment 3 Docket No. G002/M-23-77 Page 3 of 3 Docket No. G002/M-23-77 DOC IR No. 4 Supplement Att A Page 1 of 1

C-2. The number and percentage of industrial 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.

Account Class: Industrial

All Occurren	ces Not Rea	ad for Long	er than 12	Months	
	2022	2021	2020	2019	2018
ABS MCC Calc Reading	0	0	0	1	0
Bad Key or Code	0	0	0	0	0
Bad Ert	0	0	0	0	0
BUSINESS CLOSED	0	0	1	0	0
Cannot Locate	0	0	0	0	0
Customer Requests Skip	0	0	1	0	0
DEAD REGISTER	0	1	2	1	3
DOOR LOCKED	0	0	0	0	0
GATE PROBLEM	1	1	0	0	0
Handheld Estimate	0	0	0	0	2
KEY NOT AVAILABLE	0	3	4	0	1
METER OFF	12	32	16	3	10
METER REMOVED	0	2	0	0	3
METER WILL NOT PROBE	0	0	0	0	0
No Answer	0	6	3	1	0
Need Key or Code	2	6	1	0	0
NO READING RETURNED	71	95	83	155	259
Non Energized	4	0	0	0	0
Pandemic	0	0	0	0	0
Seasonal	1	4	3	2	4
VACANT	0	8	2	0	1
Total	91	158	116	163	283

Not Public Document – Not For Public Disclosure Public Document – Not Public Data Has Been Excised Public Document

Xcel Energy		Information Request No.	5
Docket No.:	G002/M-23-77		
Response To:	Minnesota Department of Commerc	e	
Requestor:	Mary Beth Kehrwald		
Date Received:	August 17, 2023		

Question:

Topic: Service Extension Request Times Reference(s): Attachment D

Minnesota Rules 7826.1600 requires data on service extension request response times be provided for customers requesting service to a location (A) not previously served by the utility and (B) previously served by the utility, but not served at the time of the request.

In the report, Xcel notes that requests for service to locations that have been previously served (Minnesota Rules 7826.1600, Subp B) but are not being served at the time of the request are nearly all requests for customers who have had their meter locked due to credit.

Please clarify if Attachment D includes data for service related to a location (A) not previously served by the utility or (B) previously served by the utility, but not served at the time of the request.

Provide data for the service location type(s) stipulated in Minnesota Rules 7826.1600 but not included in Attachment D for 2018 - 2022.

Response:

Attachment D included with the Company's 2023 Gas Service Quality Annual Report includes data for service related to a location not previously served at the time of request only. Attachment A to this response provides the requested data for 2018 – 2022 for locations previously served by the Company but not served at the time of the request, by customer class, for each calendar month. The Company commits to include data from Minnesota Rule 7826.1600, Subpart B in our annual reports going forward.

Preparer:	Zachary Langner	Joe Mansur
Title:	Meter Reading & Collecting	Director Dist Planning and
Department:	Meter Reading Support	Dist Planning & Performance
Telephone: Date:	715-737-7042 August 28, 2023	651-229-2286

Service Extension Request Response Time Minn. R. 7826-1600, B Customers requesting service to a location previoulsy served by the utility, but not served at the time of the request

1.36

Average Days

2.19

1.49

1.15

2018 Gas Reconnects

Residential	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total 2018
Reconnects	67	35	33	86	112	158	158	215	219	519	179	44	1825
Average Days	1.84	1.18	1.44	1.41	1.55	1.37	1.39	1.3	1.49	1.37	1.35	1.75	1.45
Commercial	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total 2018
Reconnects	35	21	28	23	4	8	5	18	13	61	46	17	279
Average Davs	1.28	1.22	1.09	0.99	1.6	1.6	1.04	1.36	1.36	1.31	1.57	1.59	1.33

2019 Gas Reconnects Total 2019 Residential Jan Feb Mar May Jun Jul Aug Sep Oct Nov Dec Apr Reconnects 33 29 129 250 256 289 218 274 701 197 56 2454 22 Average Days 1.32 2.22 1.44 1.25 1.4 1.61 1.33 1.99 1.42 1.37 5.88 1.52 1.90 Total 2019 Commercial Feb Mar May Oct Dec Jan Apr Jun Jul Aug Sep Nov Reconnects 22 10 19 20 23 11 19 19 18 74 40 27 302

	2020 Gas Reconnects													
Residential	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total 2020	
Reconnects	20	36	13	25	26	13	29	36	29	48	31	22	328	
Average Days	1.75	7.57	1.62	1.34	1.67	1.84	1.54	2.03	0.88	1.32	1.67	1.22	2.04	
Commercial	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total 2020	
Reconnects	18	25	21	7	4	3	1	9	9	12	16	9	134	
Average Days	1.18	8.6	1.47	2.3	1.01	2.03	1.1	3.49	2.31	0.79	1.61	1.58	2.29	

Residential	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total 2021	
Reconnects	20	9	12	13	26	19	20	95	116	175	107	35	647	
Average Days	1.31	1.21	1.98	1.85	1.12	1.25	1.91	1.47	2.12	1.87	1.8	3.03	1.74	
Commercial	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total 2021	
Reconnects	5	5	5	2	5	5	0	21	4	26	30	10	118	
Average Days	0.87	3.33	1.15	0.96	1.08	2.8	0	1.47	1.44	1.27	2.05	1.74	1.65	

	2022 Gas Reconnects													
Residential	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total 2022	
Reconnects	15	13	16	21	23	81	66	105	162	172	79	43	796	
Average Days	1.63	1.22	1.62	3.1	1.37	1.48	1.69	1.99	1.4	2.29	1.04	3.05	1.82	
Commercial	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total 2022	
Reconnects	13	6	7	13	10	7	11	20	11	33	26	16	173	
Average Days	2.3	1.24	5.68	1.55	1.17	1.18	5.48	1.68	3.54	1.71	4.09	2.03	2.64	

3.64

3.53

1.54

1.83

1.23

2.45

1.62

1.89

0.65

2021 Gas Pacannacts

Not Public Document – Not For Public Disclosure Public Document – Not Public Data Has Been Excised Public Document

Xcel Energy	Supplement Information Request No.	8
Docket No.:	G002/M-23-77	
Response To:	Minnesota Department of Commerce	
Requestor:	Mary Beth Kehrwald	
Date Received:	August 17, 2023	

Question:

Topic: Natural Gas Service Interruptions Reference(s): Attachment J

Please confirm the average outage time for outages due to all other causes. The time indicated in the report for outages due to all other causes is 0:00.

Response:

While preparing the response to this IR, we discovered that a March incident was placed in the section titled "Outages Due to Employees/Contractors" and should have been placed in the section titled "Outages Due to All Other Causes" because this was a third-party incident. Attached is a revised Attachment J. The adjusted average out for "Outages Due to Employees/Contractors" is 4.8. The adjusted average outage time for "Outages Due to All Other Causes" is 1.3.

Supplement:

Please see Attachment J Supplement where the numbers have been formatted into hours and minutes as provided in our May 1, 2023 Annual Gas Service Quality Report. With the format change to hours and minutes, the adjusted average for "Outages Due to Employees/Contractors" is 4:48. The adjusted average outage time for "Outages Due to All Other Causes" is 1:24. The initial reported 1.3 in "Outages Due to All Other Causes" was based on numeric reporting. Once the correction to hours and minutes was made, the actual numeric equivalent is 1.4.

Preparer:	Thomas C. Anderson	
Title:	Director Gas Operations	
Department:	Gas Metro & GEO Ops NSPM	
Telephone:	651-229-2431	
Date:	August 28, 2023	Supplement: August 30, 2023

Department Attachment 5 Docket No. G002/M-23-77 Page 2 of 2

> Docket No. G002/M-23-77 DOC IR No. 8 Supplement Attachment J Page 1 of 1

XCEI Energy Natural Gas Service Quality Report 2022 Natural Gas Service Interruptions

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total 2022
Outages Due to Employees/Contractors													
Number of Homes	0	0	0	0	361	62	317	61	122	381	0	0	1,304
Number of Incidents	0	0	0	0	1	2	3	3	3	1	0	0	13
Average Outage Time (Hr: Min)	0:00	0:00	0:00	0:00	6.50	4.75	6.00	3.00	3.00	11.00	0:00	0:00	4:48
Outages Due to All Other Causes													
Number of Homes	0	0	1	0	0	1	0	0	0	0	1	0	3
Number of Incidents	0	0	2	1	0	1	0	0	0	0	1	0	5
Average Outage Time (Hr: Min)	0:00	0:00	3.50	0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00	1:24

Not Public Document – Not For Public Disclosure Public Document – Not Public Data Has Been Excised Public Document

Xcel Energy		Information Request No.	9
Docket No.:	G002/M-23-77		
Response To:	Minnesota Department of Comme	erce	
Requestor:	Mary Beth Kehrwald		
Date Received:	August 17, 2023		

Question:

Topic: Manual Shut-Off Installation

Reference(s): Report Table 8

Please provide an update to the report's table 8: Manual Shut-Off Installation. The Total row for the Total Number of Installed Manual Shut-Off Valves is less than the sum of the customer class totals for this column. This value would also affect the percentage of suitable customers with Manual Shut-Off Valves.

Response:

Table 8 has been updated to reflect the correct summation for the Total Number of Installed Manual Shut-Off Valves for total Customer Class and adjusted for the percentages in (d) accordingly.

Customer Class	Number of Customers Suitable for Manual Shut- off Valves (a)	Total Number of Installed Manual Shut-Off Valves (b)	Number of Customers Who Requested Installation (c) ¹ (subset of (b))	Percentage of Suitable Customers with Manual Shut-Off Valves (d)			
Residential	65,398	191	0	0.29%			
Commercial	15,820	303	0	1.92%			
Industrial	327	7	0	2.14%			
Municipal	327	7	0	2.14%			
Total	81,872	508	0	0.62%			
¹ Number of requests in 2022							

TABLE 8: MANUAL SHUT-OFF INSTALLATION

Preparer:	Christopher Akins
Title:	Directory Operations Standards
Department:	Standards & Compliance Program Development
Telephone:	303-581-3298
Date:	August 28, 2023

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce Comments

Docket No. G002/M-23-77

Dated this 8th day of September 2023

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St, Louis, MO 63119-2044	Electronic Service	No	OFF_SL_23-77_M-23-77
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_23-77_M-23-77
George	Crocker	gwillc@nawo.org	North American Water Office	5093 Keats Avenue Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_23-77_M-23-77
Sharon	Ferguson	sharon.ferguson@state.mn .us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_23-77_M-23-77
Edward	Garvey	edward.garvey@AESLcons ulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_23-77_M-23-77
Todd J.	Guerrero	todd.guerrero@kutakrock.c om	Kutak Rock LLP	Suite 1750 220 South Sixth Stree Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_23-77_M-23-77
Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_23-77_M-23-77
Michael	Норре	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_23-77_M-23-77
Richard	Johnson	Rick.Johnson@lawmoss.co m	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-77_M-23-77
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-77_M-23-77

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Peder	Larson	plarson@larkinhoffman.co m	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_23-77_M-23-77
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 E 7th St St Paul, MN 55106	Electronic Service	No	OFF_SL_23-77_M-23-77
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_23-77_M-23-77
Andrew	Moratzka	andrew.moratzka@stoel.co m	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-77_M-23-77
David	Niles	david.niles@avantenergy.c om	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-77_M-23-77
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_23-77_M-23-77
Christine	Schwartz	Regulatory.records@xcele nergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_23-77_M-23-77
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_23-77_M-23-77
James M	Strommen	jstrommen@kennedy- graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-77_M-23-77