COMMERCE DEPARTMENT

September 16, 2024

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**
Docket No. G002/M-24-31

Dear Mr. Seuffert:

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

> 2023 Annual Gas Service Quality Report (Report) submitted by Northern States Power Company, doing business as Xcel Energy (Xcel or the Company).

Xcel filed the report on May 1, 2024.

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

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

MBK/ad
Attachment

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. G002/M-24-31

I. INTRODUCTION

On April 16, 2009, The Minnesota Public Utilities Commission (Commission) opened an investigation into natural gas service quality standards and requested comments from the Minnesota Department of Commerce, Division of Energy Resources (Department) and all Minnesota regulated natural gas utilities in Docket No. G999/CI-09-409. The Order dated August 26, 2011 required Xcel to begin submitting annual service quality reports in May 2011. Subsequent orders revised and updated the reporting requirements.

The Commission established a Natural Gas Service Quality Working Group (NGWG) in Docket No. G002, G022, G004, G011, G008/CI-22-548 to develop and refine future reporting requirements for natural gas utilities. The Order in this docket adopted the NGWG's recommendations and authorized the Executive Secretary to establish a comprehensive list of current gas service quality reporting requirements which all gas utilities shall work from in future reporting. This list was documented in the February 2, 2024 Notice of Gas Service Quality Reporting Requirements.

Xcel filed its 2023 annual service quality report (Report) on May 1, 2024.

The Commission issued a Notice of Comment Period on May 15, 2024.

II. SUMMARY OF REPORT AND DEPARTMENT ANALYSIS

The Department reviewed Xcel's 2023 Report to assess compliance with the reporting requirements established by the Commission. The Department used information from past annual reports to facilitate identification of issues and trends regarding Xcel's performance.

The Department provides responses to the Commission's questions and a summary of the Department's review of Xcel's 2023 Report.

A. RESPONSE TO COMMISSION QUESTIONS

1. Should the Commission accept CenterPoint, GMG, Great Plains, MERC, and Xcel Energy's 2023 Annual Gas Service Quality Reports?

Based on its review of Xcel's 2023 *Annual Natural Gas Service Quality Report*, the Department recommends the Commission accept the 2023 Report.

2. Are there other issues or concerns related to this matter?

The Department also recommends that the Commission find that Xcel has completed their excess flow valve (EFV) and manual shut-off valve outreach pursuant to the Commission's July 31, 2019 Order in Docket No. G999/CI-18-41.

B. REPORT ANALYSIS

As referenced in the introduction, the reporting requirements are summarized in the February 2, 2024 Notice of Gas Service Quality Reporting Requirements in Docket No. G002,G022,G004,G011,G008/CI-22-548 along with references to the original Commission orders establishing the requirements. The August 26, 2010 Order in Docket No. G999/CI-09-409 set many of Xcel's initial reporting requirements, in alignment with the electric utilities' reporting requirements as documented in Minnesota Rules 7826. The Department includes links to those rules where referenced by the Commission's orders regarding reporting requirements for gas utilities.

1. Call Center Response Time (Minn R. 7826.1200)

The Orders in Docket Nos. G999/CI-09-409[1] and G002/M-11-360[2] established the reporting requirements for natural gas providers' call center response time. Gas utilities are required to report the percent of calls answered within 20 seconds and the average time to answer an incoming call. The call center response time requirements were designed based on Minnesota Rules 7826.1200 for electric utilities which states that utilities shall answer 80% of calls during business hours within 20 seconds.

[1] The Docket No. G999/CI-09-409, Order dated August 26, 2010 established the initial reporting requirements for Xcel, IPL, CenterPoint, and MERC.
[2] Docket No. G002/M-11-360 Order dated March 6, 2012.

Table 1: Call Center Response Times for Xcel[3]

		Including IVR Calls[4]		Excluding IVR Calls[5]	
Year	**Avg. Speed (Seconds)[6]**	**# of calls**	**12 Mo. Avg.**	**# of calls**	**12 Mo. Avg.**
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%
2022	127	2,663,988	84.6%	1,116,997	58.9%
2023	76	2,710,725	85.3%	1,199,945	61.8%
10-year Avg	**67.4**	**3,065,090**	**88.1%**	**1,348,733**	**69.5%**

Table 1 above shows that Xcel's call volume is starting to improve from pandemic levels. The Company's call answer performance was at a low in 2021 and has been gradually improving over the last two years. Including Interactive Voice Response (IVR) calls, the Company answered 85.3% of calls within 20 seconds. For agent-only calls (excluding IVR calls), the Company answered 61.8% of calls within 20 seconds. October was the lowest performance month for call center response times, reaching a low of 47.6% service level of agent-only calls and March was the highest performance month with a peak of 78.0% of agent-only calls answered within 20 seconds.

The Department concludes that the Company met the service quality standard and reporting requirements for call center data.

2. Meter Reading Performance (Minn R. 7826.1400)

The following information is required for reporting on meter-reading performance by customer class for each month:

A. The number and percentage of customer meters read by utility personnel;

[3] Petition, Attachment B.
[4] Xcel includes Interactive Voice Response (IVR) calls when reporting call center answer times. In Department Attachment 1 of the Department Comments in Docket No. G002/M-23-77, the Company noted that the Commission-approved Service Quality Tariffs in the Minnesota Gas Rate Book define "Telephone Response Time" as including calls answered by IVR. The data on all calls including IVR calls is based on Attachment B, 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 B.
[5] The data on service calls excluding IVR for 2014 - 2022 can be found in Docket No. G002/M-23-77 Department Comments, Department Attachment 1. For 2023, the data on service excluding IVR is based on Attachment B, lines 5 and 22.
[6] The Average Speed of Answer is for agent-only calls per Attachment B, line 23.

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 period of longer than 12 months, and an explanation as to why they have not been read; and
D. Data on monthly meter-reading staffing levels, by work center or geographical area.

Xcel provided detailed meter-reading information, including information on its monthly meter-reading staffing levels. Table 2 summarizes Xcel's meter-reading statistics.

Table 2: Meter-Reading Performance 2014 – 2023[7]

	Percent Read by Company	Percent Read by Customer	Average Number of Meter Reading Personnel
2014	97.39%	0.0011%	15.0
2015	98.07%	0.0008%	14.7
2016	96.59%	0.0008%	13.5
2017	96.71%	0.0005%	12.5
2018	96.94%	0.0003%	12.2
2019	99.87%	0.0004%	12.2
2020	99.84%	0.0006%	12.5
2021	99.82%	0.0003%	12.4
2022	93.89%	0.0005%	12.3
2023	99.78%	0.0005%	28.9[8]
10-Year Average	**97.89%**	**0.0006%**	**14.6**

Xcel reported utility personnel read an annual average of 99.78% of customer meters in 2023, while customers read 0.0005%.[9] The percent of meters read by staff reflects a nearly 6% increase from the 10-year low of 93.89% in 2022. In 2023, Automated Meter Reading (AMR) meters account for 99.79% of the Company's meters.[10] "No Reading Returned" remained the most common reason (80.6%) across all customer classes for failure of meters to be read.[11] "No Reading Returned" is the code that automatically generates if an actual meter read or skip code is not entered in the system.[12] Xcel noted

[7] Petition, Attachment C.
[8] Petition, page 5. In 2023, meter reading staff were combined with field representative staff to create a larger "universal team" with responsibilities broader than the prior years' meter-reading staff.
[9] Petition, Attachment C, Tables A and B.
[10] Department Attachment 1 (Company Response to Department Information Request (IR) 3).
[11] The Department's calculation is based on meters not read for 6-12 months for all customer classes based on data provided in Attachment C, Tables C-1.
[12] Petition, page 4.

that it does train staff on entering skip codes and has routine conversations and trainings with employees on best practices to try to get meaningful data from the system.[13]

Xcel has had significant increases in the number of meters not read for periods of 6-12 months and periods longer than 12 months over the last two years.[14] In response to the Department's request for an explanation of the increase in unread meters, Xcel noted the Company experienced supply chain issues related to Xcel's AMR vendor for legacy meters continued to be a challenge in 2023, but by the end of Q1 of 2024 have been resolved.[15]

The Company had an average of 12.3 meter-reading staff from 2018 – 2022 but increased to 28.9 meter-reading staff in 2023. Xcel noted that the Company combined meter-reading staff with field representative staff to create a larger "universal team" in 2023.[16] As a part of this shift, meter readers were transitioned and trained to be Consolidated Collector Readers (CCR) with broader duties than were previously performed by meter readers. In response to a Department Information Request (IR), the Company explained that meter reading for Advanced Metering Infrastructure (AMI) and AMR meters accounted for approximately 60% of the duties for a CCR, equal to 14.5 full-time equivalent staff,[17] which is a small increase from the ten-year average meter-reading staff. The Company stated that it expects this number to continue to grow until AMI and AMR roll out is complete.[18]

The Department concludes the Company met the meter reading reporting requirements for 2023.

3. Involuntary Service Disconnection Data (Minn R. 7826.1500)

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.[19] Table 3 summarizes Xcel's residential customer disconnection statistics:

[13] Department Attachment 1 (Company Response to Department IR 3).
[14] Attachment C, page 8 of 8 and Errata filing dated August 30, 2024, Table 4.
[15] Department Attachment 2 (Company Response to Department IR 1).
[16] Petition, page 5.
[17] Department Attachment 3 (Company Response to Department IR 4).
[18] Ibid.
[19] 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).

Table 3: Residential Customer Involuntary Disconnect Information[20]

Year	Received Disconnect Notice	CWR[21] Protection		Disconnected Involuntarily	Restored within 24 Hours		Restored by Entering Payment Plan
		Sought/Granted	% Granted		Count	%	
2014	1,166,975	114,561	100%	25,532	10,283	40%	1,250
2015	1,042,775	152,992	100%	26,394	11,556	44%	1,201
2016	870,665	130,052	100%	20,584	7,698	37%	1,512
2017	747,409	140,943	100%	19,211	6,587	34%	1,254
2018	559,011	115,472	100%	17,310	6,486	37%	1,469
2019	521,548	78,271	100%	16,699	6,318	38%	4,250
2020	222,803	58,225	100%	2,820	1,610	57%	969
2021	396,367	80,143	100%	6,292	3,466	55%	3,889
2022	678,664	126,910	100%	8,538	3,197	37%	5,533
2023	774,507	132,831	100%	24,722	11,126	45%	12,248
10-Yr Avg	**698,072**	**113,040**	**100%**	**16,810**	**6,833**	**43%**	**3,358**

In 2023, the Company sent 774,507 disconnection notices and disconnected 24,722 residential customers for non-payment. Of those customers, 45% were re-connected within 24 hours. The number of customers restored by entering into a payment plan increased significantly in 2023.[22]

Xcel noted that it believes the increase in customer disconnections in 2023 is a reflection of the current economy and amplified by customers who continue to struggle to pay their bills coming out of the pandemic. The Company noted that it continues to see past due balances grow, and in the event of disconnection, this makes it harder for a customer to resume service due to the magnitude of that past due balance. The Company also noted that AMI technology contributed to the increase in customer disconnections by reducing resource limitations to perform disconnections and reconnections;[23] however, in response to a Department IR, the Company indicated that it has not shifted to AMI meter technology for its natural gas customers.[24] In 2023 1.8% of disconnects were for gas customers (five-year average is 3.3%), so the vast majority of disconnects were for electric customers.[25] Trends and demographics of disconnected customers are discussed further in the Company's electric safety, reliability, and service quality report for 2023.[26]

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[20] Department Attachment 4 (Company Response to Department IR 5 provided an update to Petition, Attachment D including 2014 data). Corrections to 2015 – 2022 data are also reflected in the Company's Errata filing dated August 30, 2024, Attachment D.
[21] CWR = Cold Weather Rule.
[22] Petition, Attachment D, page 4 of 11.
[23] Petition, page 6.
[24] Department Attachment 5 (Company Response to Department IR 6).
[25] Department Attachment 6 (Company's emailed response for clarification on Department IR 6).
[26] Docket No. E002/M-24-27. The Company's filing includes an equity analysis (starting on page 106) which includes a discussion on disconnections (starting on page 111).

The Company stated that it "continues to see past due balances grow, and in the event of disconnection, this makes it harder for a customer to resume service due to the magnitude of that past due balance. Even so, we continue to work with our customers to set up payment arrangements to avoid disconnection and help bring their past due balance down in a manageable but meaningful way."[27] Table 3a below summarizes the last five years' data on residential past due customer counts, past due amounts, and customer counts with payment arrangements.

Table 3a: Average Data on Customers With Past Due Amounts and Payment Agreements[28]

	Average Number of Past Due Residential Customers	Average Past Due Dollar Amount Per Past Due Customers	Average Number of Customers with Current Payment Arrangements
2019	166,511	$270	Not Available
2020	163,420	$371	Not Available
2021	165,378	$502	22,596
2022	176,058	$503	35,006
2023	185,529	$540	37,693[29]
5-Yr Avg	**171,379**	**$437**	**31,765[30]**

Table 3a demonstrates that the average number of past due customers has been increasing over the last five years as has the average amount past due dollar amount per past due customer, and, over the last three years, the number of customers with current payment arrangements.

The Department concludes the Company met the involuntary disconnection reporting requirements for 2023.

4. Service Extension Requests (Minn. R. 7826.1600)

The following information is required for reporting on service extension request response times by customer class and 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

[27] Petition, page 6.
[28] Petition, Attachment D, page 1 and page 5, and Department Attachment 5 (Company Response to Department IR 6).
[29] Petition, Attachment D, page 5 of 11. Note that Attachment D, page 2 of 11 shows a different value of customers with payment arrangements in July 2023 which would result in a 2023 monthly average of 37,610 customers with current payment plans.
[30] Figure is a three-year average since 2019 and 2020 average number of customers with current payment arrangement counts are not available.

> 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.

Additionally, utilities also shall report the types of extension requests, such as requests for reconnection after disconnection from nonpayment, for locations previously served and not previously served.

Table 4a below summarizes Xcel's 2023 service extension request data for new service extensions requests.

Table 4a: Service Extension Requests for New Locations[31]

	Residential		Commercial	
	# of Installations	Avg Days to Complete	# of Installations	Avg Days to Complete
2019 – 2023 Avg	3,238	5.71	170	12.39
2023 Actual	2,628	5.02	171	19.23

Xcel's residential service extension requests for new locations were down in 2023 compared to the average, and the average number of days to complete the requests were down. The number of commercial requests for new locations was consistent with the five-year average, but the average days to complete commercial new service extension requests was up significantly in 2023. The Company stated that it improved the capabilities of a design automation tool which resulted in work orders being entered earlier in the process while crews were not available to install earlier. It stated that the increase in average days is transparent to customers and that customer satisfaction scores have been flat or increasing.[32]

Table 4b Service Extensions Requests for Locations Previously Served[33]

	Residential		Commercial	
	# of Installations	Avg Days to Complete	# of Installations	Avg Days to Complete
2019 – 2023 Avg	917	1.82	156	2.01
2023 Actual	361	1.60	51	1.6

The Company provided a count of the number of installs for locations previously served which includes Cold Weather Rule reconnections. The number of installs in 2023 is down from the five-year average while the average days to complete reconnection is at a five-year low for both residential and commercial customers.

[31] Company's Errata filing dated August 30, 2024, Attachment E.
[32] Petition, page 8.
[33] Company's Errata filing dated August 30, 2024, Attachment E.

The Department concludes the Company met the service extension request reporting requirements in 2023.

5. Customer Deposits

The reporting requirements for customer deposits were updated by the Order in Docket No. G002/CI-22-548.

Xcel requires deposits upon notification from the bankruptcy court and/or customers of their bankruptcy petitions. The Company starts service anew after a customer files bankruptcy and includes a deposit amount on the first bill. Xcel did not make any changes to this process in 2023.[34]

The Department concludes the Company met the customer deposit reporting requirement for 2023.

6. Customer Complaints (Minn. R. 7826.2000)

The gas utility reporting requirements for customer complaints are as described in Minnesota Rules 7826.2000 and 7820.0500. The reporting on customer complaints must include the following information by customer class and calendar month:

A. The number of complaints received;
B. The number and percentage of complaints alleging billing errors, inaccurate metering, wrongful disconnection, high bills, inadequate service,[35] and the number involving service-extension intervals, service-restoration intervals, and any other identifiable subject matter involved in 5% or more of customer complaints;
C. The number and percentage of complaints resolved upon initial inquiry, within 10 days, and longer than 10 days;
D. The number and percentage of complaints resolved by taking: the action the customer requested, a mutually agreed upon compromise, providing the customer with information that demonstrates the grieved situation is not within the utility's control, or refusing to take the action requested by the customer; and
E. The number of complaints forwarded to the utility by the Commission's Consumer Affairs Office (CAO) for further investigation and action.

Additionally, utilities are required to provide the information noted in Minnesota Rules 7820.0500.

[34] Petition, page 8.
[35] As summarized in Xcel's 2022 report (Docket G002/M-23-77), parties agreed to provide additional detail for reporting of the "Inadequate Service" complaint category to include four sub-categories: Field/Operations, Customer Service, Programs and Services, and Cold Weather Rule Protection. Xcel provides this level of detail for complaints handled by Customer Advocates, but for Call Center complaints does not break inadequate service into the more detailed sub-categories.

Table 5a summarizes the customer complaint data that the Company reported were handled by the Company's Customer Advocate Group (CAG). In 2023, the CAG handled 1,223 electric and natural gas complaints, 759 of which were forwarded by the Commission's CAO.[36]

Table 5a: Customer Complaints Handled by CAG (2014 – 2023)[37]

Year	# Handled by CAG	# Forwarded by CAO	% Resolved on Initial Inquiry	% Resolved by Taking Customer- Requested Action	Top Complaint Category
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
2023	1,223	759	3.3%	11.5%	Billing Error
10-Yr Avg	**687**	**268**	**13.8%**	**30.5%**	

Table 5b provides detail on the Company's call center complaints. Xcel received 33,752 customer complaints to their call center in 2023. Approximately 97% of these complaints were resolved by taking the action the customer requested, consistent with the ten-year average.

Table 5b: Customer Complaints Handled by Xcel's Call Centers[38]

Year	# Handled by Xcel's Call Centers	% Resolved by Taking Customer Action	Top Complaint Category
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	99%	Billing Errors
2020	285,557	99%	Billing Errors
2021	34,346	96%	Billing Errors
2022	22,792	94%	Inadequate Service
2023	33,752	97%	Inadequate Service
5-Yr Avg	**185,358**	**97.15%**	

[36] Petition, Attachment F pages 1-5.
[37] Petition, Attachment F pages 1-5.
[38] Department Attachment 7 (Department compiled call center data from Petition, Attachment F and Errata Filing updates to Attachment F).

The call count dropped significantly in 2021 and stayed lower than the historic average into 2023;[39] however, the 2023 call volume is up significantly from 2022. The number of complaints handled by the Customer Advocates and forwarded by the Commission's CAO approximately doubled from 2022 to 2023. The Company reports calls for gas and electric customers together. The Company stated that the increase in complaints forwarded by the CAO and received from call centers from 2022 to 2023 was primarily driven by residential customer complaints and were largely focused on disconnections and reconnection payment plans as a result of the Company's increased overall disconnections.[40]

Xcel provided the contact information for personnel designated to receive and respond to the requests and directives of the Commission regarding customer inquiries, service requests, and complaints in response to a Department IR as required by Minnesota Rules 7820.0500, part C.[41]

The Department concludes Xcel has met the customer complaint reporting requirements for 2023.

7. Gas Emergency Phone Line Answer Time

The Company is required to report its answer times to the utility's gas emergency phone line and the average number of minutes it takes to respond to an emergency.

Table 6: Gas Emergency Calls[42]

Year	# of Gas Emergency Calls	Average Response Time (seconds)	# of Gas Emergency Line Calls	Average Response Time (seconds)
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
2023	36,124	7	6,298	10
5-Yr Avg	**36,519**	**5.8**	**6,531**	**9**

January was the lowest performing month for average answer time of the gas emergency phone line in 2023 at 14 seconds.[43] Answer time over the last five years has fluctuated narrowly, and 2023's figures are in line with the Company's recent performance at responding to gas emergency calls.

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[39] In the Docket No. E002/M-23-73 Company Reply Comments dated June 30, 2023, page 3, the Company attributed the observed decrease in calls to process changes which included "no longer recording inquiries that are not actual complaints."
[40] Department Attachment 8 (Company Response to Department IR 12).
[41] Petition, Attachment F, page 1 of 17: Robert Duenes, Customer Advocate Analyst, Customer Care (806) 513-1493.
[42] Petition, Attachment G.
[43] Petition, Attachment G.

The Department concludes the Company has met the gas emergency phone call reporting requirements for 2023.

8. Gas Emergency Response Times

In compliance with the Commission Order in Docket No G999/CI-09-409, Xcel reports information on its response time to gas emergencies. Xcel is required to report on the percentage of emergencies responded to within one hour and within more than one hour as well as the average number of minutes it takes to respond to an emergency.

Table 7: Gas Emergency Response Time for Xcel[44]

Year	# of Gas Emergency Calls	Average Response Time (minutes)	% of Calls Answered in an Hour or Less
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%
2023	13,557	29.01	97%
5-Yr Avg	**13,316**	**31.87**	**96%**

As shown in Table 7, Xcel has improved the Company's gas emergency response time over the last ten years and had consistent performance in recent years. The five-year average (2019 – 2023) response time was 31.87 minutes with 96% of calls answered in an hour or less. The 2023 performance is slightly better than the recent five-year average, with an average response time of 29.01 minutes and 97% of calls answered in an hour or less. The total number of gas emergency calls has been relatively stable over the last ten years, with 13,557 calls in 2023.

The Department concludes the Company met the gas emergency response reporting requirements for 2023.

9. Excavation Damages

As a result of the Natural Working Gas Group's recommendations and Commission's order in Docket No. G004/CI-22-547, excavation damage reporting criteria as described below replaces the prior mislocate and system damage reporting requirements that had been ordered in Docket No. G999/CI-09-409. All gas utilities are required to report the following metrics:

A. The number of excavation tickets received;

[44] Petition, Attachment H. In Department Attachment 9 (Company Response to Department IR 14), the Company indicated that there was no gas explosion event in 2023.

B. The number of excavation damages;
C. The number of excavation damagers per 1,000 excavation tickets; and
D. The number of at fault damages.

Xcel indicated that the information from subparts a, b, and d can be found in Attachment A, the appended PHMSA report. The Company reported 1.6 excavation damages per 1,000 excavation tickets.[45]

Table 8a: Xcel Excavation Damages[46]

Year	Number of Excavation Tickets	Number of Excavation Damages	Damages per 1,000 Tickets	% at Fault Damages
2019	193,093	312	1.62	22%
2020	207,803	379	1.82	22%
2021	204,603	310[47]	1.52	21%
2022	193,202	323	1.67	22%
2023	198,447	317	1.60	20%
5-Year Avg	**199,430**	**328**	**1.64**	**21.6%**

The number of excavation tickets has been relatively stable over the last five years. Damages per 1,000 tickets is at a five-year low of 1.60 in 2023. The level of at fault damages was 20% in 2023 which is consistent with the five-year average.

Attachment A also includes a high-level summary of the root cause of excavation damage which is summarized in Table 8b below.

Table 8b: Root Cause of Excavation Damage (2023)[48]

Root Cause	Incident		
	2023 Count	2023 %	Five-Yr Avg %
Excavation Practices Not Sufficient	174	54.9%	48.1%
One Call Notification Practices Not Sufficient	80	25.2%	30.0%
Locating Practices Not Sufficient	63	19.9%	21.6%
Total	**317**		

In 2023, 55% of excavation damages were caused by insufficient excavation practices, which has been the leading root cause of excavation damage for each of the last five years for the Company. The percent of excavation damages caused by insufficient locating practices (at fault damages) was 19.9% in 2023, consistent with the Company's five-year average. The Department asks Xcel to describe in

[45] Petition, page 10.
[46] Petition, Attachment A page 3 of 4 and Department Attachment 10 (Company Response to Department IR 15). Per Department Attachment 10, excavation damage caused by locating practices not sufficient is considered at fault damage.
[47] Company's Errata filing dated August 30, 2024, Table 3.
[48] Petition, Attachment A page 3 of 4.

reply comments what efforts the Company is taking to improve locating practices for excavation tickets and reduce at fault damages.

The Department concludes the Company met the excavation damage reporting requirements for 2023.

10. Service Interruptions

Xcel is required to report the number of service interruptions categorized by whether it was caused by the utility's employees or contractors or whether it was due to any unplanned causes. Xcel provided this data in Attachment I, and the Department has summarized it in Table 9 below.

Table 9: Gas Service Interruption[49]

Year	Number of Homes Affected	Number of Incidents Caused by Xcel	Average Duration of Outages Caused by Xcel (hours:minutes)	Number of Incidents Caused by Others	Average Duration of Outages Caused by Others (hours:minutes)
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	942	30	1:35	179	1:58
2019	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
2022[50]	1,307	13	4:48	5	1:24
2023	453	2	6:30	4	4:15
5-Yr Avg	**1,895**	**14.8**	**3:24**	**64.4**	**2:13**

The number of homes affected by interruptions was down significantly in 2023 (453) compared to 2022 (1,307), and the total number of incidents (6) also decreased in 2023, but the duration of outages increased. The Company reported six gas service interruption incidents, two of which were caused by Xcel and the remainder caused by others.

The Company noted that outages can vary depending on the season, and there can be a large range of variability in the number of homes impacted by an incident. The Company will always err on the side of

[49] Company's Errata filing dated August 30, 2024, Attachment I. Note that the number of homes impacted by outages due to employees/contractors was calculated based on the June and November data.
[50] See Docket No. G002/M-23-77 Department Comments, 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.

safety when making decisions to interrupt gas in-lieu-of using an alternate method to maintain system pressure.[51]

The Department concludes the Company met the service interruption reporting requirements for 2023.

11. Major Incident & MnOps Reporting

In 2023 Xcel reported seven major incidents[52] and received eleven MnOps violation letters.[53] Over the last five years, the Company has reported an average of 20.8 incidents and 16.8 violation letters.

The Department concludes that the Company met the required major incident, MnOps emergency response violations and MnOps violation letter reporting requirements for 2023.

i. Major Incident Reporting

The Company provided an updated Attachment J detailing major incident reporting in its August 30, 2024 Errata filing.

In six of the incidents, the area was secured and the main or service repaired to fix the issue. In the remaining incident, a valve was inadvertently turned off by city maintenance work and gas was reintroduced to fix.

ii. MnOps Emergency Response Violations & Violation Letters

The Company provided a summary of the eleven incidents resulting in MnOps violation letters in Table 2 of the Petition including citation codes and remediations.[54]

The Company has received an average of 16.8 violation letters over the last five-years (2019 – 2023), so the eleven violation letters received in 2023 is lower than the recent average even though it was an increase from the five letters received in 2022.

12. Integrity Management Plan Reporting

The Company included its United States Department of Transportation, Pipeline and Hazardous Materials Safety Administration (PHMSA) Gas Distribution System Annual Report for 2023 as Attachment A to its Annual Report as required. The Department has reviewed this report and provides a summary below.

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[51] Petition, page 11. See also Department Attachment 11 (Company Response to Department IR 16 which provides further detail on factors which can influence gas interruptions and resolutions).
[52] Company's Errata filing dated August 30, 2024, Attachment J.
[53] Petition, page 14.
[54] Petition, page 14 – 15.

Table 10: Hazardous Leaks Eliminated/Repaired, 5-Year Average and 2023 Counts[55]

	Main Leaks		Service Leaks	
Leak Cause	**5-Year Average (2019 - 2023)**	**2023**	**5-Year Average (2019 - 2023)**	**2023**
Corrosion Failure	0.4	1	36.8	36
Natural Force Damage	6.2	8	33.6	36
Excavation Damage	70.0	56	241.4	257
Other Outside Force	5.6	7	38.2	44
Pipe, Weld, Joint	11.2	8	46.8	40
Equipment Failure	3.8	4	80.2	114
Incorrect Operation	0.2	0	1.2	2
Other Cause	14.6	13	68.0	51
Hazardous Leak Count	**112.0**	**97**	**546.2**	**580**
All Leak Total	**190.6**	**211**	**1,385.4**	**1,645**
% of Leaks that were Hazardous	**58.8%**	**46.0%**	**39.4%**	**35.3%**
Leaks Per 1,000 Miles of Main or 1,000 Services	19.81	21.58	3.05	3.56

In 2023, Xcel had 9,777.3 miles of distribution main in the system, 92% of which is plastic PE (polyethylene). The number of miles of distribution main is up from a five-year average of 9,619.7 miles.

In 2023, equipment failure and excavation damage were the leading causes of all main leaks (38% and 27% respectively). Excavation damage and other causes were the leading causes of hazardous main leaks (58% and 13% respectively). For service leaks, equipment failure caused 56% of all service leaks and 20% of hazardous service leaks. Excavation damage was the leading cause of hazardous service leaks, making up 44% of hazardous services leaks in 2023, which is consistent with the five-year average.

The leaks per 1,000 miles of main and leaks per 1,000 services is up in 2023 compared to the five-year average as is the total leak count. The percent of leaks that were hazardous (for both mains and services) is down in 2023 compared to the five-year average.

The percent of unaccounted for gas in 2023 was 2.72% which is up from the five-year low in 2022 of 1.99%. The five-year average of unaccounted for gas is 2.31%.

The Department concludes that the Company provided the required Integrity Management Plan Reporting from their Annual PHMSA Distribution Report.

[55] Petition, Attachment A, page 3 of 4.

13. Excess Flow Valves (EFVs) and Manual Shut-Off Valves

In response to a Department IR, the Company provided an update on EFV and Manual Shut-Off Valve installations and outreach efforts. The Company noted that it will include EFV and manual shut-off valve data in Part E of the PHMSA Report in future gas service quality reports.[56]

Table 11a: EFV Installation Data (2023)[57]

Customer Class	Number of Customers Suitable for EFV	Number of Installed EFVs	Percentage of Suitable Customers with EFVs[58]	Number of Customers Unsuitable for EFV
Residential	395,187	165,879	41.97%	65,765
Commercial	19,537	7,867	40.27%	16,135
Industrial	196	120	61.00%	337
Municipal	288	99	34.20%	331
Total	**415,208**	**174,223**	**41.96%**	**82,568**

In 2022, Xcel reported 163,908 installed EFVs, so 2023 reflects an increase of 10,315 installed EFVs, 82% of which were for residential customers. The percentage of suitable customers with EFVs increased from 40.73% in 2022 to 41.96% in 2023.

Table 11b: Manual Shut-Off Valve Data (2023)[59]

Customer Class	Number of Customers Suitable for Shut-off Valve	Number of Installed Shut-off Valves	Percentage of Suitable Customers with Shut-off Valves[60]
Residential	65,765	271	0.41%
Commercial	16,135	372	2.30%
Industrial	337	9	2.73%
Municipal	331	8	2.42%
Total	**82,568**	**687**	**0.83%**

The Company increased the number of installed shut-off valves by 179 in 2023, 45% to residential customers and 39% to commercial customers. The percentage of suitable customers with manual shut-off valves increased from 0.62% in 2022 to 0.83% in 2023.

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[56] Department Attachment 12 (Company Response to Department IR 19).
[57] Company's Errata filing dated August 30, 2024, Table 1. The Company notes that the total of installed EFVs includes customers without a customer class identified.
[58] Department Attachment 12 notes that a single EFV or Manual Shut-Off Valve may be installed to serve more than one customer on a residential or commercial service, so this value is not necessarily equal to the number EFVs installed divided by the number of customers suitable for EFV installation.
[59] Company's Errata filing dated August 30, 2024, Table 2. The Company notes that the total of installed shut-off valves includes customers without a customer class identified.
[60] Department Attachment 12 notes that a single EFV or Manual Shut-Off Valve may be installed to serve more than one customer on a residential or commercial service, so this value is not necessarily equal to the number of shut-off valves installed divided by the number of customers suitable for shut-off valve.

The Department concludes the Company has met its reporting requirements for Excess Flow Valves and Manual Shut-Off Valves in 2023.

In compliance with the July 31, 2019 Order in Docket No. G999/CI-18-41, Xcel provided an update[61] on the EFV outreach reporting requirements initially established by the August 20, 2018 Order in the same docket.[62]

In the December 18, 2018 Compliance Filing – Points 5, 6, and 7 in Docket No. G999/CI-18-41, Xcel stated that it had 2,252 customers with locations that serve the public in some capacity as considered in the Commission's Order Point 7a, 375 of which already had an EFV or manual service shut-off valve installed and would not be part of the Company's Communication Plan. Of the remaining 1,877 locations, the Company stated that it planned to pursue a mixture of communication efforts depending on the existing relationship with the customer, customer type and size.

Xcel provided an updated Compliance Filing – EFVs in Docket No. G999/CI-18-41 on March 30, 2020, providing an update on outreach efforts to the 1,877 customers identified under Order Point 7a who did not have an EFV or manual service shut-off valve. At that time, the Company had met with 117 of the 190 customers that it intended to have face-to-face meetings with and that due to the Covid-19 pandemic some of the in-person meetings would pivot to phone calls instead. Of the 117 customers who had met with the Company at the time of the filing, 36 had expressed in interest in learning more and were directed to Xcel's Builders Call Line specialists for more information.

Information was communicated to the other (business solutions center-managed and non-managed) customers in this group via a letter campaign which was completed in August 2019. The Company received approximately ten follow-up calls from these customers with questions about valve installations, but none of the customers had expressed an interest in pursuing the installation of an EFV or curb valve.[63]

The Company's update on EFV outreach indicates that outreach to these customers was completed by June 30, 2020. Some of the outreach originally planned to be completed with face-to-face meetings was shifted to telephone follow-ups due to the COVID-19 pandemic. Xcel has not tracked whether the customers identified under the August 20, 2018's Order paragraph 7a have installed EFV or manual shut-off valves. The Company did not describe any ongoing outreach efforts but stated that it continues to install EFVs and manual shut-off valves as new, eligible service lines are installed, existing service lines are repaired or replaced, or a customer requests installation.[64]

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[61] Department Attachment 13 (Company Response to Department IR 20).
[62] Xcel is required to report on the items outlined in in the August 20, 2018 Order, order points 7a – 7c through the 2025 reporting period.
[63] Docket No. G999/CI-18-41 Compliance Filing – EFVs on March 30, 2020.
[64] Department Attachment 13 (Company Response to Department IR 20).

The Department concludes that Xcel has provided the required update on EFV and manual shut-off valve installations. Additionally, the Department concludes that Xcel has completed their EFV and manual shut-off valve outreach pursuant to the Commission's July 31, 2019 Order in Docket No. G999/CI-18-41.

14. Web-Based Metrics

Gas utilities will be required to report web-based metrics beginning in 2025, for reporting year 2024. Xcel did not include this information in the 2023 Report and noted that it will begin reporting web-based metrics in next year's report.

15. Xcel-Specific Reporting: Meter Equipment Malfunction (Field Orders)

In addition to the metrics that are reported by all gas utilities, Xcel is required to report on meter equipment malfunctions (field orders). The Company provides this data in Attachment K. Additionally, the Company provided a letter dated April 23, 2024 which detailed a meter reading error which the Company identified in January 2024 and resolved.

i. Required Meter Equipment Malfunction Data

The Department provides a summary of the gas meter equipment malfunction data reported in Attachment K along with a comparison to five-year averages (2019-2023) below.

Table 12: Gas Meter Equipment Malfunction Orders (2023)[65]

	2023			Five-Year Avg		Avg Response Target[66] in Avg Days
	Count	% of Orders	Avg Days	% of Orders	Avg Days	
Investigate & Remediate Orders	3,159	71.3%	7.17	73.1%	5.61	9
Investigate & Refer Orders	799	18.0%	6.91	16.4%	5.19	9
Remediate Upon Referral Orders	475	10.7%	14.34	10.5%	15.78	15
Total Gas Orders	**4,433**		**7.89**	**Count: 4,079**	**6.34**	

The number of gas orders in 2023 were up from the five-year average and the average days to address increased for two of the three solution types, but the breakout of resolution types remained consistent. While the average days to respond went up in 2023, they were below the average response targets established in the Natural Gas Rate Book.

[65] Petition, Attachment K.
[66] The average annual response targets are set in the Natural Gas Rate Book Section 6, Sheet 13.1.

ii. Additional Information Provided

Xcel provided a letter dated April 23, 2024 which detailed a meter issue that the Company identified in January 2024. The Company is in the process of replacing current fixed network AMR technology in gas meters which will no longer be supported when the Company's agreement with the meter reading provider (CellNet) expires at the end of December 2025. The meter issue was related to some of the equipment replacements, and a misalignment in drive rates on one-foot drive meters that had an installed index of two feet, causing the gas consumption to double.[67]

At the time of the letter, the Company had identified 643 customers impacted by this issue and corrected the issue by installing a new one-foot drive index.[68] In response to a Department IR, the Company indicated that an additional five instances of this issue were identified at the end of July 2024. The Company stated that all identified instances have been resolved.[69]

The Company consulted with the CAO prior to moving forward with billing credits, and then credited 50% of the billed invoice to impacted customers in April 2024 to make these customers whole for the misalignment of drive issues.[70] There are nine inactive accounts that still have a credit balance remaining, totaling $1,000.53 which the Company has attempted to contact but has not received forwarding details for at this time.[71]

As of August 12, 2024, the Company reported that it is on track to replace all meters/modules dependent on CellNet before the agreement expires in December 2025 and is 48% complete with replacements in Minnesota.[72]

The Department concludes that for 2023, Xcel has provided the required meter equipment malfunction reporting.

III. DEPARTMENT RECOMMENDATIONS

Based on its review of Xcel's 2023 *Annual Natural Gas Service Quality Report*, the Department recommends the Commission accept the 2023 Report.

The Department also recommends that the Commission find that Xcel has completed their EFV and manual shut-off valve outreach pursuant to the Commission's July 31, 2019 Order in Docket No. G999/CI-18-41.

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[67] Docket No. G002/M-24-31, Letter dated April 23, 2024, page 1-2.
[68] Docket No. G002/M-24-31, Letter dated April 23, 2024, page 2.
[69] Department Attachment 14 (Company Response to Department IR 22).
[70] Docket No. G002/M-24-31, Letter dated April 23, 2024, page 2.
[71] Department Attachment 14 (Company Response to Department IR 22).
[72] Ibid.

The Department asks Xcel to describe in reply comments what efforts the Company is taking to improve locating practices for excavation tickets and reduce at fault damages.

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Xcel Energy		Information Request No.	3
Docket No.:	G002/M-24-31		
Response To:	Minnesota Department of Commerce		
Requestor:	Mary Beth Kehrwald		
Date Received:	July 26, 2024		

Question:
Topic: AMR Meters
Reference(s): Petition pages 3-5 and Attachment C

A. What ratio of Xcel meters are equipped with Automated Meter Reading (AMR)?
B. What percent of reads in 2023 were done via the AMR system?
C. In 2023, 80.6% of meters not read for 6-12 months were for "No Reading Returned," which is the code that automatically generates if an actual meter read or skip code is not entered into the Meter Reading system. Does the Company provide staff training on entering skip codes to get better data on what issues are preventing meters from being read?

Response:
A. AMR accounts for 99.79 percent of our meters, or 1:474 being non-AMR.
B. AMR accounted for 99.56 percent of our meter reads in 2023.
C. Yes. Training on entering skip codes is part of the initial training for the position. Additionally, we have routine conversations and trainings with employees on best practices.

Preparer:	Cory Trusty
Title:	Performance Analyst
Department:	Meter Reading
Telephone:	715-737-7038
Date:	August 6, 2024

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Xcel Energy		Information Request No.	1
Docket No.:	G002/M-24-31		
Response To:	Minnesota Department of Commerce		
Requestor:	Mary Beth Kehrwald		
Date Received:	July 26, 2024		

Question:
Topic: Discreet Meters Unread
Reference(s): Petition, Attachment C page 8 of 8

A. Please describe how the parameters for the data reported in the Discreet Meters Unread tables in the instant Petition compares to the data provided in Docket No. G002/M-23-77 Table 3. The industrial data in the instant petition does not match the industrial data in Docket No. G002/M-23-77's Table 3 data which was limited to remove duplicate premises.
B. The number of discreet meters unread for 6-12 months and for 12+ months went up significantly in 2022 and again in 2023. Please explain the reason for this increase and how the Company plans to improve meter reading performance.

Response:
A. In Docket No. G002/M-23-77 (2023 Docket), two tables were provided. The difference in occurrence data shown in Table 2 of the 2023 Docket and the premise data shown in Table 3 of the 2023 Docket is the premise data in Table 3 eliminates duplicate reporting that occurred at that premise during the specified timeframe. For example, a meter may show as unread each month for four months. Table 2 counted this as four occurrences at a single premise while Table 3 counted it as one occurrence at the premise.

   Data in the current Report, shown in the Discreet Meters Unread tables at Attachment C page 8 of 8, provide the occurrences where a meter was not read for the specified time period at a given premise.

   The historic industrial data in this Report is different than that shown in Table 2 of the 2023 Docket because the data in this Report removed interval read requests from the data (which were included in prior Table 3). The decision was made to remove the interval read requests because those requests are not truly an unread occurrence. Interval read requests relate to an interval systems

communication issue that impacts 2-Way Load Profile meters (interval meters); these read requests reflect a specific prompt by the Company's billing department to fill perceived gaps in our system and do not reflect an unread meter.

B. As noted in our Electric Service Quality filing in Docket No. G002/M-24-27, "In 2023, supply chain issues related to obtaining parts from our AMR vendor for legacy meters continued to be a challenge, resulting in a significant decrease in automated read performance and driving our inability to receive and exchange meters/modules that were not transmitting. This ultimately caused an increase in "No Read Return" estimates. Looking forward, by the end of Q1 2024, most of the supply chain issues we have experienced that contributed to the decreased meter performance have been resolved and inventory levels have returned to normal for most meter types."

Preparer:	Cory Trusty
Title:	Performance Analyst
Department:	Meter Reading Support
Telephone:	715-737-7038
Date:	August 9, 2024

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Xcel Energy		Information Request No.	4
Docket No.:	G002/M-24-31		
Response To:	Minnesota Department of Commerce		
Requestor:	Mary Beth Kehrwald		
Date Received:	July 26, 2024		

Question:
Topic: Meter Reading Staffing Levels
Reference(s): Petition, page 5

A. Please describe how the responsibilities of meter reading staff changed in 2023.
B. Indicate the anticipated percent of time that meter-reading duties are expected to take for "universal team" staff and the approximate full-time equivalent number of staff for duties previously done by meter-reading staff.

Response:

A. With the transition from automated meter reading for both gas and electric to AMI for electric and AMR drive by for gas, we transitioned and trained our Meter Readers to be Consolidated Collector Readers (CCR). This enables our employees to do the manual meter reads that they have always performed but also to collect drive by gas reads.

   For electric meters, the manual meter reading duties are changing slightly with the AMI deployment. Previously when a meter required a manual read, a meter reader would physically read the meter and enter the read into a handheld device. The new process is to attempt to still remotely read the meter by being in a closer proximity to the meter and using an FSU (Field Service Unit) to access the meter and IMA (Itron Mobile Application) to pick up the interval data.

   With the addition of Opt Out Meters, CCRs use electronic probes to extract interval data from non-communicating meters. While this is a job function they have always performed for commercial and demand meters, the numbers have increased significantly as well as the time it takes to complete them.

The AMR drive by gas reads is a new process where the gas meters are populated on a screen, and CCRs drive by and collect the data using software installed on a computer inside the vehicle.

B. In 2023, meter reading for both AMI and AMR meters accounted for approximately 60% of the duties for a CCR, equal to 14.5 full-time equivalent staff. We expect these number to continue to grow until AMI and AMR roll out is complete. This includes additional staff added to accommodate AMR drive by readings for gas meters, which were previously read remotely.

Preparer:	Zachary Langner	Dawn Pittman
Title:	Meter Reading Analyst	Mgr, Revenue Cycle Field Ops
Department:	Meter Reading Support	Collections N XLS
Telephone:	715-737-7042	715-852-5864
Date:	August 12, 2024	

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Xcel Energy		Information Request No.	5
Docket No.:	G002/M-24-31		
Response To:	Minnesota Department of Commerce		
Requestor:	Mary Beth Kehrwald		
Date Received:	July 26, 2024		

Question:
Topic: Involuntary Disconnect Data
Reference(s): Attachment D, page 4 of 11 (PDF page 36)

Attachment D, page 4 of 11 reports a summary of Xcel's disconnect data from 2015 – 2023. The Department did an audit of this table against historic service quality reports and identified discrepancies with the following data:

- Total Residential Customer Disconnects for 2016, 2018, 2022;
- Number of Customers Restored within 24 Hours for 2015 – 2022;
- Number of Customers Restored with Payment Plan for 2015 – 2022; and
- Number of Customers Seeking/Granted CWR Protection for 2021.

Please review and confirm, providing an updated table which also adds 2014 data into the table. Please highlight any changes made to 2015 – 2023 data.

Response:
Please see Attachment A which contains confirmed values and highlighted changes to the December 2023 Residential Customer Status Report, utilizing year-end Residential Customer Status Reports. Where available, 2014 data has also been included. The discrepancies likely result from a number of variables, including multiple reporting sources and modifications over time due to changing premise and customer information.

Preparer:	Daniel Teague
Title:	Customer Policy Specialist
Department:	Customer Advocacy & Assistance
Telephone:	715-737-3030
Date:	August 12, 2024

All Utilities

Utility	Total Res. Customers (12 month avg)	Total Residential Customer Disconnects	# LIHEAP Customers	# LIHEAP Disconnects	Disconnect Rate (%), Total Residential	Disconnect Rate (%), LIHEAP	# Customers Restored within 24 hours	# Customers Restored with Payment Plan	# Customers Disconnected 30+ days	# Customers Seeking CWR Protection	# Customers Granted CWR Protection	# Customers Requesting Medical Acct Status	# Customers Granted Medical Acct Status
2014 Xcel Energy		25,532					10,283	1,250		114,561	114,561		
2015 Xcel Energy	1,196,104	26,394	59,861	2735	2.2%	4.6%	11,556	1,201	3,731	152,992	152,992	3,130	2,806
2016 Xcel Energy	1,207,795	20,584	58,810	2,308	1.7%	3.9%	7,698	1,512	2,717	130,052	130,052	3,813	3,145
2017 Xcel Energy	1,219,835	19,211	55,377	2,522	1.6%	4.6%	6,587	1,254	2,418	140,943	140,943	3,438	3,110
2018 Xcel Energy	1,238,942	17,310	55,223	3,191	1.4%	5.8%	6,486	1,469	2,290	115,472	115,472	5,155	3,926
2019 Xcel Energy	1,253,679	16,699	55,521	3,939	1.3%	7.1%	6,318	4,250	2,474	78,271	78,271	4,497	4,127
2020 Xcel Energy	1,271,372	2,820	48,973	846	0.2%	1.7%	1,610	969	325	58,225	58,225	4,987	3,977
2021 Xcel Energy	1,292,627	6,292	47,924	201	0.5%	0.4%	3,466	3,889	1,761	80,143	80,143	4,380	3,777
2022 Xcel Energy	1,301,219	8,538	56,254	759	0.7%	1.3%	3,197	5,533	3,467	126,910	126,910	4,628	1,612
2023 Xcel Energy	1,319,148	24,722	57,270	2,252	1.9%	3.9%	11,126	12,248	5,417	132,831	132,831	2,193	1,772

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Xcel Energy		Information Request No.	6
Docket No.:	G002/M-24-31		
Response To:	Minnesota Department of Commerce		
Requestor:	Mary Beth Kehrwald		
Date Received:	July 26, 2024		

Question:
Topic: Involuntary Disconnect Data
Reference(s): Petition, page 6-7, Attachment D page 5

A. How is the reconnect fee for a customer determined?
B. Has the calculation of the fee/fee amount changed with the shift to AMI technology? If so, please describe how the fee calculation has changed and provide the average fee before AMI and after for a customer with similar other characteristics.
C. Please provide the following data for 2018 – 2022:
    a. The monthly average number of customers with current payment plans (in 2023, Attachment D2, lower column F).
    b. Average past due dollar amount per past due customer (in 2023, Attachment D1, column E).
    c. For 2018 – 2023, provide the average monthly percent of customers with payment plans who are (1) current and (2) past due.

Response:
A. The Company's reconnection fee of $22.50 was established in a prior rate case, Docket No. G002/GR-04-1511. In that case, the Company and the Department of Commerce (DOC) filed an Offer of Settlement, in which the reconnection fee would move from $15.00 to $45.00, such that the fee would better represent actual reconnection costs of $42.30. Energy Cents Coalition and the Office of Attorney General opposed this change. The Commission approved a $22.50 reconnection fee, noting that moving this charge to cost was "outweighed in this case by potential harm to low-income households, to publicly and charitably funded energy assistance programs, and to the public interest." The reconnection fee has remained at $22.50.

B. The Company has not shifted to AMI meter technology for its natural gas customers, and therefore the service reconnection charge of $22.50 has remained unchanged.

C.a. For clarity, Attachment D2, lower column F in the current report reflects monthly totals, not averages. Please see Tables 1 &2 for the same information (the number of natural gas and electric customers with current payment plans) for 2021 and 2022. This data was not a reporting requirement prior to 2021, so the data for 2018-2020 is not available.

Table 1

2021	Number of Customers with Current Payment Agreements
Jan-21	8,663
Feb-21	8,839
Mar-21	10,901
Apr-21	12,231
May-21	13,586
Jun-21	21,132
Jul-21	26,157
Aug-21	33,747
Sep-21	37,221
Oct-21	36,905
Nov-21	32,968
Dec-21	28,804

Table 2

2022	Number of Customers with Current Payment Arrangements
Jan-22	25,611
Feb-22	25,764
Mar-22	30,076
Apr-22	37,051
May-22	41,337
Jun-22	40,538
Jul-22	36,802
Aug-22	40,132
Sep-22	43,698
Oct-22	34,182
Nov-22	34,491
Dec-22	30,385

C.b. Please see Table 3 for the average past due dollar amount per past due customer

Table 3

	Average Past Due Dollar Amount Per Past Due Customers
2018	$269
2019	$270
2020	$371
2021	$502
2022	$503

C.c. With respect to question C.c., we are unsure how to respond to this request as phrased. All customers with payment plans have past due balances. Payment plans themselves cannot be considered "past due;" payment plan statuses are either current, completed, or cancelled.

Preparer:	Christopher Barthol	Daniel Teague
Title:	Rate Consultant	Customer Policy Specialist
Department:	NSPM Regulatory	Customer Advocacy & Assistance
Telephone:	612-321-3237	715-737-3030
Date:	August 12, 2024	

From: Kehrwald, Mary Beth (She/Her/Hers) (COMM) <MaryBeth.Kehrwald@state.mn.us>
Sent on: Monday, August 19, 2024 2:43:48 PM
To: Kostiuk, Nathan C <Nathan.C.Kostiuk@xcelenergy.com>
CC: Gibbs, Pamela K <Pamela.K.Gibbs@xcelenergy.com>
Subject: 24-31_IR 6 follow-up

Follow up: Follow up
Start date: Monday, August 19, 2024 12:00:00 AM
Due date: Monday, August 19, 2024 12:00:00 AM

Hi Nathan,

In the Petition (page 6), Xcel noted that AMI has contributed to the increase in its customers disconnections, stating that "the deployment of AMI technology allows previously, resources limited our ability to perform them." In response to Department IR 6, the Company noted that it has not shifted to AMI meter technology for i

1. Has Xcel tracked if the increase in disconnections is limited to electric customers? If yes, please provide the figures of gas vs electric disconnections for 2019 -
2. Please describe how gas disconnections/reconnections are performed and general timing from decision to connect/disconnect to actual connection status ch

Thanks!

The increase is not limited to electric customers, but a greater percentage of electric customers were disconnected comparing 2023 to 2022, versus gas customers.

	2023	2022	2021	2020	2019
Residential Disconnections	24,722	8,538	6,292	2,820	16,693
Electric	24,280	8,150	6,062	2,819	14,939
Gas	442	388	230	1	1,754

Gas disconnections are performed by our Consolidated Collector Readers team. Gas reconnections are completed by gas technicians as they require pilot relights. Once a gas customer satisfies reconnection requirements service is restored by the end of the next business day. Credit disconnections for both gas and electric customers generally follow the same process and include weekly communications over a nine-week timeframe.

From: Kehrwald, Mary Beth (She/Her/Hers) (COMM) <MaryBeth.Kehrwald@state.mn.us>
Sent on: Monday, August 19, 2024 6:29:38 PM
To: Morse, Matthew P <matthew.p.morse@xcelenergy.com>
CC: Kostiuk, Nathan C <Nathan.C.Kostiuk@xcelenergy.com>
Subject: 24-31_IR 8 follow-up

Follow up: Follow up
Start date: Monday, August 19, 2024 12:00:00 AM
Due date: Monday, August 19, 2024 12:00:00 AM

Hi Matthew,

I left you a voicemail earlier, and wanted to follow-up with an email so you can respond by email if preferred.

The response provided for the Department's IR 8 in Docket 24-31 provided the number of residential and commercial customers reconnected, but it did not provide the later of the in-service date requested by the customer of the date the premises were ready for service). Please submit a supplemental response with the timelir in the IR.

Department Compiled Call Center Data from Updated Attachment F, A - K (received in response to Dept IR 11) Docket No. G002/M-24-31

Customer Complaint Report COMPILED DATA - 2023							**Turnaround Days for Closing a Complaint**		
	Agree	**Compromise**	**Demonstrate**	**Refuse**	**Total**	**%**	**Initial Inquiry**	**within 10 days**	**Longer than 10 days**
Commercial									
Billing Errors	3566	28	48	1	3,643	72.58%	3606	33	4
Complaint	0	0	0	0	0	0.00%	0	0	0
High Bill	164	2	4	0	170	3.39%	167	3	0
Inaccurate Metering	292	0	5	0	297	5.92%	294	3	0
Inadequate Service	738	2	7	1	748	14.90%	743	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	62	0	2	0	64	1.28%	64	0	0
Wrongful Disconnect	95	2	0	0	97	1.93%	97	0	0
Total Commercial	4,917	34	66	2	5,019	14.87%	4,971	44	4
Total Commercial Percentage	97.97%	0.68%	1.32%	0.04%	100.00%				
Industrial									
Billing Errors	871	2	6	0	879	78.62%	870	9	0
Complaint	0	0	0	0	0	0.00%	0	0	0
High Bill	10	0	0	0	10	0.89%	10	0	0
Inaccurate Metering	32	0	0	0	32	2.86%	32	0	0
Inadequate Service	175	0	0	0	175	15.65%	174	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	0	1	0	9	0.81%	9	0	0
Wrongful Disconnect	13	0	0	0	13	1.16%	13	0	0
Total Industrial	1109	2	7	0	1,118	3.31%	1108	10	0
Total Industrial Percentage	99.19%	0.18%	0.63%	0.00%	100.00%				
Residential									
Billing Errors	3976	38	51	7	4,072	14.75%	4068	3	1
Complaint	41	2	3	1	47	0.17%	14	31	2
High Bill	70	1	3	0	74	0.27%	74	0	0
Inaccurate Metering	494	1	35	0	530	1.92%	529	1	0
Inadequate Service	20660	256	332	34	21,282	77.07%	21257	22	3
MR-Special Call Cntr	7	0	0	0	7	0.03%	3	4	0
Service Extension	6	0	3	0	9	0.03%	9	0	0
Service Restoration	134	1	29	1	165	0.60%	165	0	0
Wrongful Disconnect	1379	9	41	0	1,429	5.17%	1429	0	0
Total Residential	26,767	308	497	43	27,615	81.82%	27,548	61	6
Total Residential Percentage	96.93%	1.12%	1.80%	0.16%	100.00%				
Total State of Minnesota	**32,793**	**344**	**570**	**45**	**33,752**		**33,627**	**115**	**10**
Total ST of MN Percentage	**97.16%**	**1.02%**	**1.69%**	**0.13%**	**100.00%**		**99.63%**	**0.34%**	**0.03%**

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

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Xcel Energy		Information Request No.	12
Docket No.:	G002/M-24-31		
Response To:	Minnesota Department of Commerce		
Requestor:	Mary Beth Kehrwald		
Date Received:	July 26, 2024		

Question:
Topic: Customer Complaints
Reference(s): Attachment F

A. Please explain the difference in the data reported in Attachment F: page 1, pages 2 – 4, page 5, and pages 6 – 17.
B. If the data in Attachment F pages 6-17 is call center data, it reflects a significant increase in 2023 after 2022's large decrease. In Company Reply Comments in Docket No. E002/M-23-73, 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." Please provide an explanation for the significant increase in complaints in 2023 (back to similar levels as 2021).
C. Provide an explanation for the increase in complaints from 2022 to 2023 (complaints forwarded by the CAO more than doubled and it appears calls (if this is the data from Attachment F pages 6-17) are up approximately 50% from 2022).

Response:

A. Pages 1-4 of Attachment F contain information on customer complaints handled by our Customer Advocates. Attachment F, page 5, provides the number of complaints forwarded to the Company by the Commission's Consumer Affairs Office (CAO) for further investigation. Attachment F pages 6-17 contain information on complaints handled within the Call Centers. As indicated at pages 1-2 of our Report, the data in Attachment F includes both electric and natural gas customers.

B&C. Again, this data includes complaints from both the Company's electric and natural gas customers. Increases in complaints forwarded by the CAO and received from our call centers were primarily driven by the residential class and revolve around inadequate service and wrongful disconnection. As noted in our

2023 Annual Report for the Service Quality Plan filed May 1, 2024 in Docket No. E,G002/M-12-383:

> Customer Complaints in 2023 were largely focused on disconnections and our reconnection payment plans. With the implementation of Advanced Metering Infrastructure (AMI), the Company has the capability to remotely disconnect customers, and the number of overall disconnections has increased with this capability. The capability of remote disconnection may have reached customers unused to the Company taking the final step of actual disconnection. When these customers complained, it provided us with the opportunity to engage with customers we have not otherwise been able to reach.
>
> As to payment plans, while the Company has always worked with customers to establish payment plans to avoid disconnection, historically we actually disconnected a small percentage of those eligible for disconnection for two primary reasons: (1) prior to COVID-19, our customers were more likely to pay and/or stay on a payment plan and thus avoid disconnection, and (2) prior to AMI, disconnection required a technician to manually disconnect each premise, so field resources limited total disconnections. Post COVID-19, the economy and our customers' payment habits have changed. In 2023, the Company tried different payment plan options following disconnection to encourage higher payments, but we received customer complaints about the payment plan request thresholds. In response, we decreased our thresholds and performed re-training of our call center agents to ensure they work with each individual customer to determine a plan that they can afford and that successfully helps them pay their arrears.

Preparer:	Matthew Morse
Title:	Principal Rate Analyst
Department:	NSPM Regulatory
Telephone:	612-216-8167
Date:	August 6, 2024

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Xcel Energy		Information Request No.	14
Docket No.:	G002/M-24-31		
Response To:	Minnesota Department of Commerce		
Requestor:	Mary Beth Kehrwald		
Date Received:	July 26, 2024		

Question:
Topic: Gas Emergency Response Time Detail
Reference(s): Attachment H

Please provide a description of the event, response, and damage caused by the gas explosion event in 2023.

Response:
From reviewing the September 2023 gas explosion emergency ticket entered into our system, we understand that no explosion actually occurred. This ticket was labeled as an explosion when it was created because the customer called into Customer Care stating that an explosion-like sound was made when the customer attempted to turn on the boiler. The dispatcher added additional comments to confirm that there was no actual explosion. A technician responded to the ticket, confirmed there was no explosion, locked the meter, and red tagged the appliance.

Preparer:	Matthew Morse
Title:	Principal Rate Analyst
Departm	NSPM Regulatory
Telepho	612-216-8167
Date:	August 6, 2024

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Xcel Energy Information Request No. 15
Docket No.: G002/M-24-31
Response To: Minnesota Department of Commerce
Requestor: Mary Beth Kehrwald
Date Received: July 26, 2024

Question:
Topic: Excavation Damages
Reference(s): Attachment A

Please provide the number of at-fault damages for each year from 2019 to 2023.

Table: Xcel Excavation Damages

Year	Number of Excavation Tickets	Number of Excavation Damages	Damages per 1,000 Tickets	Number of at Fault Damages
2019	193,093	312	1.62	
2020	207,803	379	1.82	
2021	204,603	526	2.57	
2022	193,202	323	1.67	
2023	198,447	317	1.60	

Response:
Please see Table 1 below, which includes the number of at-fault damages for the years 2019 to 2023. This information is provided on the annual PHMSA Report, under "Locating practices not sufficient," which is included as an attachment in each annual gas service quality report.

Additionally, based on our review of the numbers listed in the table provided with this Request, the totals for the year 2021, columns "Number of Excavation Damages" and "Damages per 1,000 Tickets" were not accurate. These have been updated in Table 1 below to sync with the numbers provided to PHMSA, and are highlighted in yellow.

Table 1
Xcel Excavation Damages

Year	Number of Excavation Tickets	Number of Excavation Damages	Damages per 1,000 Tickets	Number of at Fault Damages
2019	193,093	312	1.62	70
2020	207,803	379	1.82	84
2021	204,603	310	1.52	71
2022	193,202	323	1.67	71
2023	198,447	317	1.60	63

Preparer: Adam Martin
Title: Senior Operations Manager
Department: Damage Prevention
Telephone: 651-265-7002
Date: August 12, 2024

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Xcel Energy		Information Request No.	16
Docket No.:	G002/M-24-31		
Response To:	Minnesota Department of Commerce		
Requestor:	Mary Beth Kehrwald		
Date Received:	July 26, 2024		

Question:
Topic: Natural Gas Service Interruptions
Reference(s): Attachment I

A. Please provide an explanation for the outages with an average outage time of "N/A."
B. Please provide a description of the events leading to and resolutions of the three outages with outage times noted in Attachment I. Please also include a discussion in the response addressing the factors that influenced the outages' durations.
C. The outage durations reported in 2023 are significantly higher than the ten-year average duration for service interruptions. Please provide an explanation for this increased outage duration.

Response:

A. Please see Attachment A to this response for a revised Attachment I with updates to reflect the average times for May and November Outages Due to Other Causes. Revised Attachment I also includes corrected information for a June outage Due to Employees/ Contractors. Additionally, see Attachment B for a revised Attachment J. Attachment J contains an explanation of the outages in Attachment I. The Company intends to file a broad errata in the near future with corrections.

B. June 22, 2023 Forest Lake Event:
The Company received a report of a damaged 2-inch main by a third party at approximately 10:15 AM. Fire department closed the road. Gas was turned off at 1:15 PM, affecting 175 customers.

August 26, 2023 Moorhead Event:

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The Company received a report of no gas at approximately 10:59 AM affecting 116 premises. At approximately 5:10 PM, gas was reintroduced to the system and relights started. By 10:00 PM, only 35 customers were without gas due to not being home.

November 13, 2023 St. Paul Event:
The Company received a report of a hit line at approximately 10:57 AM. Gas was turned off at 11:40 AM affecting 131 homes. Gas was reintroduced to the system at 4:25 PM and the first attempt of relights started. By 9:00 PM, there were still 32 customers without gas due to not being home.

There are a variety of factors that may impact an outage's duration, as further discussed in our response to C. below.

C. Gas outages occur when the Company's facilities are hit and required shutting off the gas to safely repair our infrastructure. Gas incidents and the work involved to restore service can vary significantly based on several factors. These include, but are not limited to:

- The event's location: if near a busy road or intersection, coordination with local police may be required;
- Condition of the ground surface: if the ground is frozen, equipment to thaw or break through the earth may be needed:
- Specific gas pipe affected: whether the systems are tied together or a dead end; and
- The number of impacted customers: before natural gas service can be restored to a property, each individual meter must be manually shut off. Once repair to the damaged gas pipe is complete, door-to-door visits are made and technicians manually turn on each gas meter and customer appliances are relit.

Specifically in 2023, overall outage durations were higher primarily because there was one outage that impacted 175 premises and lasted 8 hours. This outage had several complicating factors, including that the gas line was not dual fed and the Company had to dig at three different locations to initiate squeeze points.

Attachment B to this response includes "private data on individuals," such as customer addresses and outage events by which they were impacted. This information is maintained by the Company as private customer data, and for this reason, pursuant

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to Minn. Stat. §13.679, we have excised this data from the public version of DOC IR 16.

Preparer:	Matthew Morse	Nicole Elmasry
Title:	Principal Rate Analyst	Career Development Assignment
Department:	NSPM Regulatory	Gas Metro & GEO Ops NSPM
Telephone:	612-216-8167	651-458-1215
Date:	August 19, 2024	

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Xcel Energy Information Request No. 19
Docket No.: G002/M-24-31
Response To: Minnesota Department of Commerce
Requestor: Mary Beth Kehrwald
Date Received: July 26, 2024

Question:
Topic: EFV & Manual Shut-Off Valve Data
Reference(s): Petition page 13 and Attachment A

On page 13 of the Petition, the Company notes that Attachment A (PHMSA report) was provided for information on the EFV and manual shut-off valves installed on the system, but Attachment A does not include EFV or manual shut-off valve data. Please provide the following data[1] broken by customer class for 2023:

EFV INSTALLATIONS

Customer Class	Number of Customers Suitable for EFV Installation (a)	Total Number of Installed EFVs (b)	Number of Customers Who Requested Installation (c)[1]	Percentage of Suitable Customers with EFVs (d) (b)/(a)	Number of Customers Unsuitable for EFVs (e)

MANUAL SHUT-OFF INSTALLATION

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)

[1] Requested data is based on the Docket No. G002/M-19-305 Compliance Filing dated December 6, 2019.

Response:
The Company's April 1, 2024 Petition incorrectly referenced Attachment A (PHMSA Report) for the required EFV and manual shut-off valve data.

The Company is providing the requested information in Table 1 and Table 2 below. Going forward, the Company will include the data previously included in Part E of the PHMSA Report in its Gas Service Quality Report.

Note that a single EFV or Manual Shut-Off Valve may be installed to serve more than one customer on a residential or commercial service. Examples of this include branched services, multi-unit dwellings, or commercial shopping plazas. Therefore, the total number of EFVs and Manual Shut-Off Valves listed may not be a true representation of the number of customers being served.

Table 1
EFV Installations

Customer Class	**Number of Customers Suitable for EFV Installation (a)**	**Total Number of Installed EFVs (b)**	**Number of Customers Who Requested Installation (c)[1]**	**Percentage of Suitable Customers with EFVs (d)** (b)/(a)	**Number of Customers Unsuitable for EFVs (e)**
Residential	395,187	165,879	0	41.97%	65,765
Commercial	19,537	7,867	0	40.27%	16,135
Industrial	196	120	0	61.00%	337
Municipal	288	99	0	34.20%	331
Total	415,208	174,223	0	41.96%	82,568

1 Number of requests during 2023

Table 2
Manual Shut-Off Valve Installation

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	65,765	271	0	0.41%
Commercial	16,135	372	0	2.30%
Industrial	337	9	0	2.73%
Municipal	331	8	0	2.42%
Total	82,568	687	0	0.83%

1 Number of requests in 2023

Preparer:	Gail Baranko	Christopher Akins
Title:	Manager, Regulatory Admin	Director, Operations Standards
Department:	NSPM Regulatory	Operations Standards
Telephone:	612-330-6935	303-571-3298
Date:	August 12, 2024	

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Xcel Energy		Information Request No.	20
Docket No.:	G002/M-24-31		
Response To:	Minnesota Department of Commerce		
Requestor:	Mary Beth Kehrwald		
Date Received:	July 26, 2024		

Question:
Topic: EFV Outreach
Reference(s): Petition, page 13 and Attachment A and Docket No. G999/CI-18-41 Compliance Filings

The February 23, 2021 Order in Docket No. G999/CI-18-41 approved Xcel's March 30, 2020 compliance report but did not acknowledge the EFV reporting as complete.

A. Please provide an update if the utility has tracked whether the customers identified in the December 18, 2018 Compliance Filing – Points 5, 6, and 7 have installed EFV or manual shut-off valves.
B. Provide an update on the outreach effort with the remaining 73 large customers identified under order point 7a who the Company had not met with at the time of the March 30, 2020 compliance filing.
C. Describe any ongoing EFV and manual shut-off valve installation outreach to these customers who have not installed EFV or manual shut-off valves after the August 2019 letter campaign described in the March 30, 2020 compliance filing.

Response:

A. The Company has not tracked whether those customers have installed EFV or manual shut-off valves.

B. All outreach to these customers was completed by June 30, 2020. In our 2020 Annual Gas Service Quality Report, Docket G002/21-301, the Company reported that the original plans to complete all face-to-face outreach to large customers would be concluded by the end of June 2020. With the COVID-19 pandemic curtailing in-person meetings, the Company completed the remaining outreach to large customers by telephone.

C. The Company continues to install EFVs and manual shut-off valves as new, eligible service lines are installed, existing service lines are repaired or replaced, or a customer requests installation.

Preparer:	Jeremy Thompson	Christopher Akins
Title:	Director, Large Account Mgmt	Director, Operations Standards
Department:	NSPM Account Management	Operations Standards
Telephone:	612-399-5378	303-571-3298
Date:	August 9, 2024	

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Xcel Energy		Information Request No.	22
Docket No.:	G002/M-24-31		
Response To:	Minnesota Department of Commerce		
Requestor:	Mary Beth Kehrwald		
Date Received:	July 26, 2024		

Question:

Topic: AMR-Related Billing Error
Reference(s): Xcel Letter dated April 23, 2024 in Docket No. G002/M-24-31

A. How many customers in total were impacted by the double-billing issue described in the Company's April 23, 2024 letter?
B. Please provide a status update of the related refunds for those who are no longer Xcel customers including a customer count and estimated total refund amount still due to be paid and if follow-up efforts have occurred to reach those customers.
C. Is the Company on track to replace meters relying on CellNet that need to be replaced prior to the expiration of the Company's agreement with CellNet (December 31, 2025)? Please provide a progress update.

Response:

A. There were 643 customers impacted as identified in the Company's April 23, 2024 letter. As of the end of July, a total of five (5) additional instances were identified. In one case, the customer called and we confirmed a similar issue, and four additional instances were identified by our contractors as they double-checked their work once we pinpointed the issue. All identified instances have been resolved following the process outlined in the letter.
B. As of August 12, 2024, we have refunded 21 of the 30 inactive accounts; 9 inactive accounts still have a credit balance remaining totaling $1,000.53. The Company attempted to contact these 9 customers in April, along with the rest of the customers affected, to obtain forwarding mailing addresses; customers received a voicemail message from an employee advising them that they can contact Xcel Energy in order to provide their forwarding address. We have not received this information for the 9 remaining accounts, which include two deceased customers.

C. Yes. The Company is on schedule to replace all meters/modules dependent on CellNet before the agreement with CellNet expires on December 31, 2025. The Company is 48 percent complete with replacements in Minnesota (2024 YTD).

Preparer:	Sean Walker	Kimberly Hoeschen
Title:	Director, NSP Gas Contracting	Manager Project Controls
Department:	Gas Contracting	Gas Contracting
Telephone:	651-229-2360	701-770-0194
Date:	August 12, 2024	

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-24-31

Dated this **16th** day of **September 2024**

/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_24-31_M-24-31
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-31_M-24-31
George	Crocker	gwillc@nawo.org	North American Water Office	5093 Keats Avenue Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_24-31_M-24-31
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_24-31_M-24-31
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_24-31_M-24-31
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_24-31_M-24-31
Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_24-31_M-24-31
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_24-31_M-24-31
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-31_M-24-31
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-31_M-24-31

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_24-31_M-24-31
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_24-31_M-24-31
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