



414 Nicollet Mall
Minneapolis, MN 55401

August 27, 2024

—Via Electronic Filing—

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

RE: COMMENTS
IN THE MATTER OF NORTHERN STATES POWER COMPANY D/B/A XCEL
ENERGY'S 2023 ANNUAL SAFETY, RELIABILITY, AND SERVICE QUALITY
REPORT
DOCKET NO. E002/M-24-27

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits these Comments in response to the Minnesota Public Utilities Commission's July 26, 2024 Notice of Comment Period.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Nathan Kostiuk at 612-215-4629 or Nathan.C.Kostiuk@xcelenergy.com or contact me at 612-330-6255 or Nicholas.F.Martin@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

NICHOLAS MARTIN
DIRECTOR, STRATEGIC OUTREACH AND ADVOCACY

Enclosure
cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

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

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

DOCKET No. E002/M-24-27

COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy (Company), submits these Comments in response to the Minnesota Public Utilities Commission's (Commission) July 26, 2024 Notice of Comment Period in the above-referenced docket. That Notice generally addresses what actions the Commission should take in relation to Xcel Energy's Interactive Service Quality (ISQ) Map and Equity Analysis, and asks nine specific questions regarding service quality, reliability, and ISQ map modifications/reporting/future actions. We respond below to each numbered question in turn.

COMMENTS

Both the TRC¹ and Pradhan and Chan² studies identified disparities in rates of disconnections and long outages (CELI-12) in Census Block Groups (CBGs) with a high proportion of People of Color (POC). We believe these disparities have entrenched societal causes including long-standing and well-documented inequities in income, wealth, education, employment, housing and other factors that affect the energy system. The Company finds the identified disparities concerning and is committed to ensuring that our programs and services are effective and aimed at

¹ *Xcel Energy, Service Quality and Demographics Analysis*, Brett Close, TRC Companies, March 26, 2024, Service Quality Report 2023, Attachment Q, Docket No. E002/M-24-27.

² *Racial and Economic Disparities in Electric Reliability and Service Quality in Xcel Energy's Minnesota Service Area*, by Bhavin Pradhan and Gabriel Chan, Humphrey School of Public Affairs, University of Minnesota, February 2024.

reducing such disparities and helping our customers avoid disconnection. We have appreciated stakeholder feedback and engagement on these issues and look forward to continuing to hear from and work with stakeholders on ways this can be achieved.

SERVICE QUALITY

1. In its April 1, 2024 Annual Report on Safety, Reliability, and Service Quality (SRSQ) Xcel Energy identified additional immediate steps it can take to expand outreach prior to disconnection that do not require Commission action. Are there other steps the Commission should take to address disparities in disconnections?

Yes, we do believe there are additional actions that the Company and/or Commission can take to address disparities in disconnections as identified in the TRC and Pradhan and Chan studies. We begin this response by providing an overview of the Company's current disconnection process and resources offered to customers to avoid disconnection. For additional context in understanding the Company's disconnection data, we also discuss the impact of the Cold Weather Rule on annual disconnection trends. Second, we recap the actions proposed in our April 1, 2024 Annual Report on SRSQ (2023 Annual Report).³ Third, we offer some additional possible actions that could address disparities in disconnections.

Note that each of these potential actions would require further analysis of feasibility, cost, and data needs prior to implementation. We offer them here to solicit stakeholders' feedback in Reply Comments regarding which actions (including those offered earlier, and those outlined in these Comments) are of most interest for further exploration. Since any one of these actions involves time and resources, some indication of priority – rather than “yes to all” – would be helpful to the Company.

A. Existing Disconnection Process and Available Resources

Xcel Energy's current disconnection process was approved by the Commission in 2023.⁴ The process begins when an Xcel Energy customer's past due balance exceeds \$180 and the customer receives a disconnection notice. The \$180 threshold for the notice is important. A customer is not eligible to receive emergency energy assistance unless they have a disconnection notice. Once a customer receives government

³ Xcel Energy Annual Report and Petition, Docket No. E002/M-24-27, April 1, 2024

⁴ Order Approving Petition as Modified and Requiring Filings, Docket No. E002/M-22-233, March 22, 2023.

assistance, they also become eligible for consideration for enrollment in the Company's affordability programs, which further helps the customer with arrears assistance and monthly bill credits to keep their bill affordable.

Once the disconnection notice process is triggered, the Company begins a nine-week process during which the Company attempts to contact the customer by multiple channels to inform them of their account status, point them to available options for energy assistance, and offer payment plan options.⁵ The current communication channels include phone calls (including voicemail messages), emails, U.S. Mail, a past due notice on their bill(s), and in some instances a field visit.

In addition to this targeted outreach, the Company has resources readily available for customers looking for help to pay bills and avoid disconnection. In a centralized location on our website, only one click away from the landing page, customers can find information on assistance options and programs that support vulnerable customers, including payment arrangements. This "one-stop" online page can be found at [Energy Assistance | Billing & Payment | Xcel Energy](#)⁶ and is also accessible via the xcelenergy.com landing page under "Get the Help You Need."

B. Remote Disconnection Capability and Annual Trends in Disconnections

The Company acknowledges that disconnections have increased since COVID-19 and are on par with disconnections in 2015. We articulated throughout our 2023 Annual Report the reasons we believe this may be occurring, including due to the economic struggles our customers continue to face.⁷

Xcel Energy began remote disconnections of customers with Advanced Metering Infrastructure (AMI) meters in May 2023. Grid Equity Commenters (GEC) note in their Reply Comments⁸ that Xcel Energy saw significant increases in disconnections in the month it started disconnection (May 2023) compared to the previous month (April 2023) and compared to disconnections at the same time in 2022. They also note that there was a significant increase in the volume of customer complaints regarding wrongful disconnections in 2023, as well as a marked increase in "billing and credit" customer complaints in May 2023.

⁵ Various energy assistance and payment arrangement options are summarized at [Energy Assistance | Billing & Payment | Xcel Energy](#) (<https://mn.my.xcelenergy.com/s/billing-payment/energy-assistance>).

⁶ <https://mn.my.xcelenergy.com/s/billing-payment/energy-assistance>.

⁷ 2023 Annual Report, Part I, pg. 8.

⁸ GEC Reply Comments, Docket No. E002/M-24-27, June 24, 2024.

GEC is correct that there was a spike of disconnections in May 2023; however, this is not unique to 2023. A similar spike can be seen every year in May, as this marks the end of the Cold Weather Rule season. Consistent with Minnesota Statute § 216B.096, each year from October 1 through April 30, Xcel Energy suspends certain residential disconnections to protect customers from cold and harmful weather conditions. Once the suspension is lifted starting May 1, disconnections that would have occurred during the months of October through April start to occur, resulting in an increase of disconnections every May. Based on this historical trend, which also occurred before remote disconnections were introduced, we do not believe that the increase in disconnections in May 2023 is primarily due to the remote disconnection capability. In support of this, the Company notes that the number of AMI disconnections that occurred in June 2023 demonstrates a 23 percent drop from the disconnection rate in May 2023. Likewise, the disconnection rate from May 2024 to June 2024 also saw a 23 percent drop. For historical perspective, in 2022, a similar drop from May to June was also observed. This consistent drop from May to June supports that the disconnection spike each May has more to do with the end of the Cold Weather Rule than with the ability to disconnect AMI customers remotely.

With respect to the increase in billing and credit complaints received, these are also not directly related to the remote disconnection capability. Those two complaint categories represent several sub-categorized complaints, including clarification of credit policies, a disconnection statement and/or balance dispute, or a request for a new payment arrangement. In short, there may be complaints in these categories that are related to many topics other than a wrongful disconnection or installation of an AMI meter.

C. Potential Actions Identified in Last SRSQ Annual Report

In our 2023 Annual Report, the Company identified two proposals to reduce disconnections in communities identified in the TRC and Pradhan and Chan studies.⁹ First, we proposed using current algorithms that identify customers throughout our service territory who have not received energy assistance from the federally funded Low Income Home Energy Assistance Program (LIHEAP) and are carrying past due balances. We proposed conducting targeted outreach to those customers to inform them of available energy assistance options through a variety of contact methods. This outreach does not require Commission approval. We can report on these efforts in the 2024 Annual Report on SRSQ, or another docket if the Commission prefers.

⁹ 2023 Annual Report at Part II, pgs. 111-112.

Second, we pointed to the proposed Automatic Bill Credit Pilot (ABC Pilot), developed with the Equity Stakeholder Advisory Group (ESAG) and intended to reduce electric energy burden for high energy-burden households, which are more likely to fall behind on energy bills and be disconnected. At the time of our 2023 Annual Report, the ABC Pilot had not yet been filed; it is now before the Commission and requires Commission approval.¹⁰ The ABC Pilot, if approved, will run for two years and be evaluated by a third-party evaluator for its success on, among other metrics, reducing disconnection rates. As a first step in the ABC Pilot, the Company will be working with an expert third-party evaluator to develop a pilot Monitoring & Evaluation (M&E) Plan. One element of this plan could be to examine the overlap between the 71 CBGs identified as eligible for the ABC Pilot¹¹ and the CBGs where disparities in disconnections were identified in the TRC study and/or the Pradhan and Chan study. We could then incorporate into our pilot M&E Plan an evaluation of any differences in disconnection rates in those CBGs that are receiving automatic bill credits versus those that are not.

Finally, in our 2023 Annual Report we proposed to leverage AMI technology to remotely restore electric service to all disconnected AMI customers for the duration of a heat advisory or excessive heat warning issued by the National Weather Service.¹² This would be in addition to halting customer disconnections when an excessive heat watch, heat advisory, or excessive heat warning is in effect, which the Company already does. We flag this proposal again here as another means to improve disconnection rates, including in the CBGs identified in the TRC and Pradhan and Chan studies.¹³ We appreciate the support of the Joint Commenters, and from the GEC on this proposal.

D. Additional Potential Actions to Reduce Disparities in Disconnections

The Company continues to discuss with stakeholders other steps we or the Commission could take to address disparities in disconnections. Here, we address some additional proposals and issues that have arisen to date in our conversations

¹⁰ *In the Matter of Xcel Energy's Petition for an Automatic Bill Credit Pilot Program*. Docket Nos. E002/M-24-173, E002/M-22-266, E002/RP-19-368.

¹¹ As proposed, eligible CBGs are those where estimated electric energy burden exceeds four percent of median household income.

¹² 2023 Annual Report, Part I, pgs. 32-33.

¹³ As noted in our 2023 Annual Report, the only limitation on this is that, in order for us to be able to remotely reconnect customers during this time period, customers must have originally been remotely disconnected.

with stakeholders.

1. Disconnection Process and Customer-Facing Information

After conversations with stakeholders, the Company has agreed to modify elements of its disconnection process and make additional information regarding our policies available to customers, in addition to those identified in our June 24, 2024 Reply Comments.¹⁴ First, while disconnection notices are sent to customers who have balances of \$180 or more on their bill – and, as explained above, this is important to trigger eligibility for certain types of government and utility assistance that require a disconnection notice – the Company will not actually disconnect customers until their past due balance reaches \$300. This gives customers additional time to connect with additional resources to avoid disconnection. Second, based on suggestions from stakeholders, we plan to add to our website additional information about our disconnect and payment arrangement policies. The Company remains open to suggestions on additional ways to improve the website for purposes of sharing helpful information for our customers.

2. Voicemail as Form of Last Contact

As described above, once a customer's past due amount reaches the \$180 threshold, the Company begins a nine-week process of trying to contact that customer by multiple channels to help them avoid disconnection, including phone calls, voicemails, emails, U.S. Mail, and a past due notice on their bill(s). The Joint Commenters state that the ability to disconnect service remotely enables the Company to disconnect more customers at a faster rate and with fewer opportunities for the customer to remedy the situation.¹⁵ On the basis of this interpretation, they, along with the GEC,¹⁶ recommend that the Commission eliminate voicemail messaging as a permissible form of final contact before disconnection.

Although we appreciate the Joint Commenters' and GEC's concerns, we can confirm that the remote disconnection capability does not change the nine-week outreach effort that we undertake prior to disconnecting any customer, so remote disconnection does not mean fewer opportunities to remedy the situation. The Company believes that at the conclusion of its extensive process, the final call that may include a voicemail message prior to disconnection provides adequate notice to

¹⁴ Xcel Energy Reply Comments, Docket No. E002/M-24-27 at 7, June 24, 2024.

¹⁵ Joint Commenters Initial Comments, Docket No. E002/M-24-27, June 14, 2024

¹⁶ GEC Reply Comments, Docket No. E002/M-24-27, June 24, 2024

our customers in lieu of a field visit. For those customers where a successful phone contact cannot be made, the Company still sends field technicians to customer homes for a final contact. Additionally, in preparation for the beginning of the Cold Weather Rule period, field technicians make field visits to customers whose service is still disconnected and leave cards to encourage them to contact us for reconnection.

Based on historical experience, and as discussed in our June 24, 2024 Reply Comments,¹⁷ we have found field visits to be no more effective than phone calls in reaching customers in real time. Customer contact rates for field visits and phone calls are both relatively low, but phone call response rates are slightly better: for example, through July 2024, customers answered the door on a field visit only 4.89 percent of the time, while disconnection phone calls were directly answered – i.e., excluding voicemail messages – 6.8 percent of the time. However when we include all types of “last call” contact – meaning the customer answers and is linked to a live agent; the customer answers and is linked to IVR, our interactive voice response system; or a voicemail message is left for the customer – then successful phone contact with the customer rises to 72.2 percent of the time for the same time period, as compared to 4.89 percent for field visits. Once successful “last call” contact has been made, our records indicate 20.2 percent of these customers contact the Company within five days. By making a last contact by voicemail, customers who work during the day or who otherwise miss or screen the call can still receive the critical information that will allow them to contact us at their convenience from any location and make a payment, make payment arrangements, or receive additional information from our trained staff regarding energy assistance. There is nothing to indicate that requiring field visits would lead to increased direct customer contact and reduced disconnections. For these reasons, the Company believes that allowing a voicemail message as a final call prior to disconnection provides adequate notice to our customers, particularly in combination with all of the other outreach undertaken by the Company prior to disconnection.

In addition to the existing process, the Company proposes to offer customers outreach via text and email to alert them of potential disconnection, where we have a customer’s permission to do so. These channels, like voicemail, allow a customer to receive and process the information at their convenience. We also have the ability to track receipt of such communications, in the same way we track phone calls, thereby ensuring customers are receiving the communications regarding potential service disconnection and increasing opportunities for customers to respond as needed. The Company proposes adding these channels to its disconnection process.

¹⁷ Docket No. E002/M-24-27, Xcel Energy Reply Comments, June 24, 2024, at 2-3.

Our goal is to continuously improve the customer experience with effective communication whenever possible. We are open to other suggestions on ways to enhance our communication processes and have had conversations with the Joint Commenters to identify additional ways to connect customers with assistance opportunities and minimize disconnections. We continue to maintain that voicemail should be permissible, and we maintain our request to the Commission to continue the variance to Minn. Rule 7820.2500 that allows us to establish successful last contact with the customer via an additional call or voicemail message in lieu of a field visit prior to disconnection.

3. Reducing Down Payments Required for a Payment Plan

One way for a customer to avoid disconnection is to establish a payment plan with the Company. In order to establish a payment plan, the customer must make a down payment (unless the customer is enrolled in one of our affordability programs, which do not require a down payment). The required down payment varies by customer, with flexibility given to account for an individual household's circumstances. All Customer Service representatives receive training and coaching on helping customers set payment arrangements that take into account any special needs of the household. In the past, when down payment guidelines were set to minimum requirements (regardless of how many times the arrangements were broken), we observed that customers continued to fall further and further behind, resulting in larger past due balances and extreme difficulties for customers to keep services connected. We continue to work with Joint Commenters on potential modifications to our current down payment structure and assess the feasibility of suggestions and how they impact customers as it relates to accumulation of past due balances. Our goal is to set policies that lead to the ability for customers to maintain their service, to get caught up on past due balances, and that do not lead to customers falling further behind, as was seen during the COVID-19 disconnection moratorium when past due amounts grew by 50 percent.

4. Paying Down Arrears or Waiving Reconnection Fees

The Company has also considered how it can use its \$500,000 underperformance payment¹⁸ to ease the payment burden of its customers who have been disconnected or have accumulated high arrears. When a customer is disconnected from service and then qualifies for reconnection, the customer must pay a reconnection fee of \$50 for manual reading of their meter. For customers who have a communicating AMI meter,

¹⁸ Docket No. E,G002/M-12-383 and E,G002/CI-02-2034.

this fee amount is set at \$13.50. Xcel Energy has proposed to use its underperformance payment to waive reconnection fees, noting that that assistance would be limited until funding runs out in nine to twelve months.¹⁹ In their Reply Comments, GEC suggests that the reconnection fee for customers be set to \$0 indefinitely. While the Company is willing to evaluate this proposal further, the current reconnection cost to customers is based on actual costs and would therefore require a recovery mechanism to cover the cost impact of removing the reconnection fee.

We have also considered the possibility of using the underperformance payment to pay down arrears for customers whose past-due balances have become very large. In our July 12, 2024 Reply Comments in Docket Nos. E,G-002/M-12-383 and E,G-002/CI-02-2034, the Company discussed three options for paying down arrears. In each case, bill credits could be applied to a customer's account who has not received LIHEAP assistance and has made a payment on their account within the prior 90-day time period. We proposed applying credits to accounts starting with the oldest outstanding balances. We discussed three direct credit options:

- 1) Apply a \$1,000 payment toward the arrears balance of 500 customers that fit the above noted criteria;
- 2) Utilize the same criteria, but in order to serve more customers, credit 1,000 customers with a \$500 payment toward their arrears balance; or
- 3) Provide credits of either \$500 or \$1000 to customers who have not received LIHEAP assistance, have made a payment within the last 90 days, and live within CBGs experiencing higher rates of disconnection.

While the third approach might take additional time to develop logistically, it is one way to address the disparities identified in the TRC and Pradhan and Chan studies. This also addresses the concerns expressed by parties in our Service Quality and Residential Customer Status Report Dockets²⁰ surrounding high arrearage balances and does so in a way that also helps customers who are experiencing higher rates of disconnection.

In terms of targeting these efforts for the highest impact, the Company believes that the LIHEAP "off season" might be an especially effective time to utilize the option to

¹⁹ GEC Reply Comments, Docket No. E002/M-24-27, June 24, 2024 at 7.

²⁰ Docket Nos. E002/M-24-27 and E,G999/CI-24-02.

pay down arrears. This “off-season” includes the summer months, when households can no longer apply for LIHEAP assistance until applications re-open in the fall. We are open to stakeholders’ ideas on how to make such an opportunity viable for customers who otherwise would not have assistance when disconnection is more likely to occur. In addition, the Company is participating in early discussions of possible legislation for the 2025 session that would supplement federal LIHEAP funds allocated to Minnesota with a state appropriation, with the goal of making energy assistance available year-round. We will continue to participate in those discussions with a view towards how state and utility resources could best complement each other to provide assistance in the LIHEAP off-season.

As seen above, there are multiple options for how the Company might use the \$500,000 underperformance penalty. We offer these multiple options to pay down arrears or waive reconnection fees to solicit stakeholders’ feedback in Reply Comments regarding which actions are most likely to achieve the desired outcomes and are of most interest for further exploration. We request stakeholders to be specific how they would prefer to see the underperformance penalty used.

2. Should the Commission consider combining annual affordability reports (for example PowerOn) as part of the SRSQ reports going forward? If so, what reporting could be combined?

The Company does not believe that combining annual affordability reports as part of the SRSQ reports is the best use of resources. That said, making all the information from those reports accessible at the same time as the SRSQ could be beneficial. The Company therefore proposes to re-file the various affordability program annual reports in the SRSQ Docket each April 1.

A large volume of data needs to be collected each year for all of the affordability and affordability program annual reports, which include (with current deadline):

- Docket Nos. E,G999/CI-20-492 and E,G-002/M-20-716: Relief and Recovery Annual Report (April 1)
- Docket No. G002/M-24-36: Gas Affordability Program Annual Report (March 31)
- Docket No. E002/CI-17-401: Performance Based Rates Annual Report (April 30)
- Docket Nos. E,G002/M-12-383 and E,G002/CI-02-2034: Service Quality Tariff Annual Report (May 1)

- Docket Nos. G001/M-24-31: Gas Service Quality Rules Annual Report (May 1)
- Docket Nos. E002/M-10-854 and E002/M-04-1956: Electric Low Income Discount Program Annual Compliance Report (December 1)
- Docket No. E002/M-23-476 Low Income Low Usage Program (December 1)
- Docket Nos. E,G999/CI-YR-2: Cold Weather Rule (monthly)
- Docket Nos. E002/M-22-266 and E002/RP-19-368: Equity in Resource Planning Annual Report (January 1)
- Docket No. E002/M-24-173 Automatic Bill Credit Pilot Program (to be determined)

Combining all of these reports into the SRSQ docket each April 1 would concentrate a large amount of data collection and reporting all at one time, which would not be possible without additional staff and hence cost. Considering this, the Company encourages the Commission to maintain the current schedule established for report filings. However, we believe the same objective – making all the information accessible at the same time – could be accomplished by re-filing the various affordability program annual reports in the SRSQ Docket each April 1.

3. Are there other matters related to affordability and disconnections that should be reported or considered as part of the SRSQ reports going forward?

As noted above, one other action that is still pending before the Commission is approval of our proposed ABC Pilot program.²¹ If the Commission directs, the results from this pilot could also be cross-reported in the SRSQ annual reports along with the other affordability programs.

RELIABILITY

4. Should the Commission direct Xcel Energy to file its proposed enhanced Vegetation Management Proposal and Targeted Undergrounding Proposal as described in its April 1, 2024, Annual Report on SRSQ? If so, when and where should the Commission direct Xcel to file the proposals?

The Company welcomes the opportunity to file an enhanced Vegetation Management Proposal and/or Targeted Undergrounding Proposal. We believe those proposals

²¹ *In the Matter of Xcel Energy's Petition for an Automatic Bill Credit Pilot Program.* Docket Nos. E002/M-24-173, E002/M-22-266, E002/RP-19-368

would best be filed in a future rate case or Integrated Distribution Plan (IDP), depending on timing.

Careful planning is particularly important with respect to any targeted undergrounding proposal. As noted in our 2023 Annual Report, the cost of undergrounding distribution lines is high, as well as highly variable depending on the location. Costs of undergrounding can range from \$500,000 per mile to as much as \$5,000,000 per mile in the case of some high-density urban locations, depending on the number of route obstructions, transformers, and services required – costs that would presumably be borne by all customers.²² Any undergrounding plan should therefore be preceded by updated analysis and careful planning to ensure it is well-designed to address the identified goals.

5. Should the Commission consider moving portions of the annual reliability report that are not required by Minn. Rules 7826 to Xcel’s biennial Integrated Distribution Plan (IDP)? If so, should the Commission refer which pieces of information to move to the IDP to the workgroup to establish a proposal for updated distribution reporting data approved in Xcel Energy’s 2023 IDP in Docket E002/M-23-452?

The Company does not believe that portions of the SRSQ should be moved to the IDP. As discussed in our Reply Comments in Docket No. 23-452, we believe that any metrics related to service quality and reliability should be reported exclusively in the annual SRSQ docket. Separating metrics between dockets will make it difficult to carefully determine what conclusions can be drawn from them. In addition, at a time when both the Commission and the Company are looking for ways to make regulatory proceedings more accessible to community groups and non-conventional intervenors with limited time and resources, it could also make it more challenging for such stakeholders to track reliability and/or disconnection issues across multiple dockets, and in particular in very voluminous dockets such as IDPs. We believe centralizing such reporting in the SRSQ docket will make it more accessible and actionable for such stakeholders.

Additionally, in the July 2, 2024, hearing in Docket No. 23-452, the Commission reaffirmed that the purpose of the IDP is to be an informational docket about the Company’s plans for the distribution system; therefore, it is not the appropriate place to report on annual reliability metrics.

²² Xcel Energy 2023 Annual Report and Petition, Docket No. E002/M-24-27, April 1, 2024 at pp. 97-98.

MAP MODIFICATIONS, REPORTING AND FUTURE ACTIONS

- 6. Are there any additional pieces of data to add to Xcel’s Interactive Service Quality Map? When considering additional data points, please address:**
- a. Whether the data is already collected and easily available in a format that could be added to the map;**
 - b. If the data is something that is within Xcel Energy’s control; and**
 - c. The purpose the additional data would serve.**

Yes, we believe including some additional data in the Company’s [Interactive Service Quality Map](#)²³ (“ISQ Map”) could be useful in informing future strategies to address the disparities identified in the TRC and Pradhan and Chan studies.

The ISQ Map currently provides the following data, reported annually by CBG:

- a) Median household income,
- b) Neighborhoods where 40 percent or more of the population is at or below 185 percent of the federal poverty level,
- c) Neighborhoods where the population of POC is 50 percent or more,
- d) Percentage of homes disconnected,
- e) Percentage of homes experiencing long duration outages of 12 or more hours (“CELI-12”),
- f) Percentage of homes experiencing 6 or more outages,
- g) Percentage of homes participating in the Energy Assistance Program, and
- h) Percentage of homes participating in Conservation Improvement Program Low Income Programs.

These eight types of data appear on the ISQ Map in three ways, to facilitate interacting with the data in the way a user finds most helpful. First, by clicking on a single CBG, a user can see a pop-up that provides the above data specific to that CBG. Second, by turning on a data “layer” at the right, a user can cause the ISQ Map to display that data layer for all CBGs, broken into ranges. For example, turning on the Median Household Income data layer adds colored dots to the Map for three ranges of income; turning on the Percent Electric Premises Disconnected layer adds shading to the Map by ranges of percent disconnections so one can see where, across a given map extent, disconnections are lowest or highest. Third, clicking the arrow at the bottom of the Map opens the tabular data for all CBGs and all eight data points –

²³ <https://xeago.maps.arcgis.com/apps/webappviewer/index.html?id=6b87f4d407864b939bcea05aad05bdd1>

which the user can then interact with by, for example, using filters (e.g., show only CBGs where median income is less than a chosen amount and percent disconnections exceed a chosen amount), or exporting the data as a .CSV file for further analysis in Excel or another program.

To the extent the Commission agrees that additional data would be helpful, the Company offers several suggestions for data that may provide further context for disconnections and outage duration. For the proposed data, we note the potential purpose the additional data could serve as well as whether the data is already collected, within our control, and could be easily added to the ISQ Map.

A. Proposed Additional Data

1. Reliability Data

The Company can add the following data to its ISQ Map to provide additional context to long-duration outages in neighborhoods with higher populations of POC:

- a) Average age of homes, and
- b) Percentage of underground electric assets²⁴

Purpose of Data: TRC, the Company's independent consultant, found a correlation between neighborhoods with higher populations of POC and increased CELI-12. By examining data on average age of homes, TRC found this correlation to be isolated to CBGs with high populations of POC and older homes.²⁵ TRC hypothesized that older homes generally had older electric assets that were more likely to be overhead (instead of underground) and thus susceptible to disruption from vegetation, causing increased CELI-12.²⁶ Adding the proposed data, along with the proposed analysis discussed below in response to Question 8, may provide additional context to the increased CELI-12 in neighborhoods with high populations of POC. Using this data, the Company and stakeholders may be able to assess whether improvements like moving electric assets underground and/or conducting enhanced vegetation management could help improve CELI-12 in neighborhoods with higher populations of POC.

Source of Data: The Company has access to the average age of homes through U.S. Census data, publicly available through the American Community Survey. The ISQ

²⁴ Electric assets include primary and secondary voltage feeder cables, power lines, transformers, and other components that help deliver electricity to customers.

²⁵ *Xcel Energy, Service Quality and Demographics Analysis*, Brett Close, TRC Companies, March 26, 2024, Service Quality Report 2023, Attachment Q, Docket No. E002/M-24-27.

²⁶ *Id.*

Map currently has other data collected through this source. The Company also collects and maintains information on its underground electric assets.

Addition to ISQ Map: The Company can add these data to the ISQ map as additional layers. Similar to the existing data in the current ISQ Map, the new data would be reported annually and by CBG.

2. *Disconnection Data*

The Company can add the following data to its ISQ Map to better understand the correlation between higher disconnections and higher populations of POC:

- a) Average amount of arrears for disconnected households, and
- b) Average age of arrears for disconnected households.

Purpose of Data: Adding these data may help the Company and stakeholders better identify CBGs that need more outreach and programs to help reduce disconnections.

Source of Data: The Company collects and maintains the average amount of arrears and age of arrears for disconnected households. Additional work would need to be done to map these data by CBG.

Addition to ISQ Map: The Company can add these data to the ISQ map as additional layers. Similar to the existing data in the current ISQ Map, the new data would be reported annually and by CBG.

B. Data Displayed on ISQ Map

If the Commission requires additional data to be added to the ISQ Map, the Company respectfully requests that it be given until April 1, 2025 to update the Map, adding the new data from 2024 onward. The ISQ Map is updated annually on April 1 of every calendar year, and our Geospatial team will need this time to ensure the new data are consistent and verifiable, as well as perform the technical updates to compile the data in a way that can be added as new layers to the ISQ map.

Separate from the decision whether to add new data going forward is the issue of how much historical data to continue displaying on the ISQ Map. The ISQ Map currently includes eight data layers for three years (2021, 2022, and 2023). If the Company adds several new layers from 2024 onward, and also continues to retain all the prior-year data, at some point we believe the ISQ Map will become cluttered, slow to load, and difficult to use for analysis.

We propose providing all data for three historical years on a rolling basis. Under this proposal, on April 1, 2025, the 2021 data would be archived and removed from the ISQ Map; the 2022 and 2023 data would remain for the existing eight data layers; and any new data layers that the Commission finds useful would be added from 2024 onward. Similarly, on April 1, 2026, the 2022 data would be archived, the 2023 and 2024 data would remain on the ISQ Map, and the 2025 data would be added to the ISQ Map. The Company would retain the archived data, and stakeholders who need data from earlier years could request it from the Company via an Information Request in this docket.

7. Should the Commission require any other reporting on data related to the disparities identified in the analyses, for example, data points recommended in the IDP or in prior comment periods in 24-27? If so, where should the reporting occur?

As set forth below, the Company has considered the further reporting that other stakeholders have suggested, and already reports on almost all the suggested reporting items. For those items it does not already report on, the Company provides additional information.

GEC Recommendations. The GECs requested reporting on: (1) disconnections by CBG annually, (2) households disconnected who were enrolled in energy assistance programs by CBG, (3) households disconnected once, twice, or three or more times, (4) households reconnected once, twice, or three or more times, and (5) total dollars past due of involuntarily disconnected residential customers with ranges, including ranges like the percentage of customers with less than \$100 past due.

Regarding GEC's first two recommendations, the Company's ISQ Map already shows percentage ranges for disconnections and households enrolled in energy assistance programs by CBG and calendar year. On GEC's third and fourth recommendations, the Company already provides in-depth reporting on disconnections and reconnections and does not think any additional reporting is necessary. For instance, the Company provides bi-annual reporting on disconnections by zip code in its compliance filings in Docket Number 24-2.²⁷ In this same docket, the Company also provides the number of customers reconnected within 24 hours and with a payment plan.²⁸ On GEC's fifth recommendation, the Company does not currently report on

²⁷ Xcel Energy Compliance Filing—January Residential Customer Status Report, Docket No. E,G999/CI-24-2, February 16, 2024.

²⁸ *Id.*

the average total dollars past due for disconnected customers but believes it can develop this reporting on an annual basis by CBG to be included in the annual SRSQ report, filed on April 1 of every calendar year. If the Commission requires this additional reporting, the Company respectfully requests that the reporting begin in 2025 so that the Company has adequate time to develop this reporting.

Fresh Energy Recommendations. Fresh Energy requested that the Company be required to report in its IDP: (1) CELI-12 in neighborhoods with a higher percentage of POC and older houses, (2) the level of disconnections in identified low-income neighborhoods with a high percentage of POC, and (3) the steps Xcel Energy is taking to reduce or eliminate disparities in CELI-12 and disconnections as well as recalculating these disparities and identifying levels of improvement over time.

Regarding Fresh Energy's first two recommendations, the Company's ISQ Map shows CELI-12, where the population of POC is equal or greater than 50 percent, rates of disconnection, median household income, and where 40 percent or more of the population is below 185 percent of the federal poverty level. This reporting is provided by CBG and annually. The only remaining item is reporting on older houses – which we have suggested incorporating into the ISQ Map, as discussed in our response to Question 6.

Regarding Fresh Energy's third recommendation, the Company is addressing what further steps can be taken to reduce or eliminate disparities in CELI-12 and disconnections in this docket. Disconnections are addressed in the responses to Questions 1-3 of this comment, and CELI-12 is addressed in the responses to Questions 4-5 of this comment.

While Fresh Energy requested the discussed data to be added to the IDP, the Company does not think it would be appropriate to re-report annual reliability metrics in the IDP. As discussed above, the Commission has reaffirmed that the IDP is an informational, planning docket filed only every other year. The IDP is also, as noted above, a very voluminous docket touching on a broad range of topics, and could be less accessible to community groups and non-conventional intervenors who are primarily interested in reliability and disconnections.

The Company does not think it would be helpful to re-report the data that the GECs and Fresh Energy are requesting because much of the information is already available in one location: the ISQ Map. If the Commission requires the Company to re-report any of the discussed metrics in a single place, the Company respectfully requests that the metrics be reported exclusively in the annual SRSQ docket.

8. Should the Commission require Xcel to conduct any further analysis on disparities in reliability or disconnections? If so, what should the studies examine, and how often should they occur?

We propose some possible further analysis here. Each proposed analysis will involve significant time and investment. Because of the limited time period for this Comment, the Company has been unable to fully evaluate the viability of the proposals. The Company looks forward to hearing from stakeholders as to which proposed analysis would be most useful to better understand and address disparities. If stakeholders are interested in pursuing one or more of the proposed analyses, the Company respectfully requests that it be given sufficient time to evaluate the viability of such analyses in terms of cost, time required, available data, and other considerations.

Reliability Analysis. On reliability, the Company could further develop its data collected on causes of CELI-12 outages to inform which causes predominantly affect CBGs currently showing increased CELI-12. The Company could then analyze whether the primary causes emerging in CBGs with increased CELI-12 are caused by overhead assets; this may help inform whether moving electric assets underground would help decrease CELI-12 in certain CBGs.

Disconnections Analysis. On disconnections, there are a couple different options for further analysis. First, the Company could hire an independent consultant to conduct qualitative interviews with residents in CBGs with higher disconnection rates to better understand perceived causes of disconnection, effective communications practices, and whether there are additional steps the Company could take to adjust its programs to help customers avoid disconnections. Second, the Company could explore the costs and impact of creating an off-season LIHEAP program, which would help income-qualified residents clear their arrears by self-attesting to their income level.

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

The Company does not have any other issues or concerns related to this matter.

CONCLUSION

Xcel Energy appreciates the opportunity to provide these comments to the Commission regarding the Company's Interactive Service Quality Map and Equity Analysis. We look forward to continued participation in this docket.

Dated: August 27, 2024

Northern States Power Company

CERTIFICATE OF SERVICE

I, Joshua DePauw, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

DOCKET No. E002/M-24-27

Dated this 27th day of August 2024

/s/

Joshua DePauw
Regulatory Administrator

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

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

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

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