

October 11, 2024

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

RE: Response Letter of the Minnesota Department of Commerce
Docket No. G002/M-24-31

Dear Mr. Seuffert:

On May 1, 2024, Northern States Power Company d/b/a Xcel Energy (Xcel or the Company) filed its 2023 Natural Gas Service Quality Performance [Report](#) (Annual Report) requesting the Minnesota Public Utilities Commission (Commission) accept the 2023 Annual Report.

In the Department's [Comments](#) filed on September, 16, 2024, the Department provided its analysis and recommended that the Commission accept the Company's Annual Report and find that Xcel has completed their excess flow valve and manual shut-off valve outreach pursuant to the Commission's July 31, 2019 Order in Docket No. G999/CI-18-41. The Department also asked Xcel to file reply comments describing what efforts the Company is taking to improve locating practices for excavation tickets and reduce at fault damages.

The Company provided the requested [Reply Comments](#) on October 4, 2024. Xcel noted that approximately 75% of locating work is performed by vendors under contract with the Company, and approximately 98% of the insufficient locating practices occur under vendor work. As a result, Xcel focused its improvement efforts on vendor performance. According to Xcel, when the root cause of excavation damages is due to insufficient locating practices, the technician's Operator Qualification is suspended, and they must be retrained and requalified before resuming locating duties. Lessons learned are also shared with other technicians. The Company also noted there is a financial incentive for vendors to avoid damages, by requiring vendors to pay for damages caused by the vendor.

The Department appreciates the additional information provided in the Company's Reply Comments and continues to recommend the Commission accept Xcel's 2023 Annual Report and find that Xcel has

Mr. Will Seuffert
October 11, 2024
Page 2

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.

Sincerely,

/s/ Peter Wyckoff, Ph.D.
Deputy Commissioner, Division of Energy Resources

MBK/ad
Attachment

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
Letter**

Docket No. G002/M-24-31

Dated this **11th** day of **October 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@mutilityinvestors.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 |
| David | Moeller | dmoeller@allete.com | Minnesota Power | 30 W Superior St Duluth, MN 558022093 | Electronic Service | No | OFF_SL_24-31_M-24-31 |
| Andrew | Moratzka | andrew.moratzka@stoel.com | Stoel Rives LLP | 33 South Sixth St Ste 4200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_24-31_M-24-31 |
| David | Niles | david.niles@avantenergy.com | Minnesota Municipal Power Agency | 220 South Sixth Street Suite 1300 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_24-31_M-24-31 |
| 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 |
| Christine | Schwartz | Regulatory.records@xcelenergy.com | Xcel Energy | 414 Nicollet Mall FL 7 Minneapolis, MN 554011993 | Electronic Service | No | OFF_SL_24-31_M-24-31 |
| 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_24-31_M-24-31 |
| James M | Strommen | jstrommen@kennedy-graven.com | Kennedy & Graven, Chartered | 150 S 5th St Ste 700 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_24-31_M-24-31 |