



414 Nicollet Mall
Minneapolis, MN 55401

July 23, 2025

—Via Electronic Filing—

Mike Bull
Acting Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: SUPPLEMENTAL COMMENTS
DOCKET NO. E,G999/PR-25-2

Dear Mr. Bull:

Northern States Power Company, doing business as Xcel Energy, submits these Supplemental Comments in response to the Department of Commerce's (Department) May 14, 2025 Comments in the above-noted docket.

1. Service Disconnections, Payment Arrangements, and Customer Protections

In section III.A of its Comments, the Department discusses a request by Citizens Utility Board of Minnesota (CUB) and the Legal Services Advocacy Project (LSAP) that the Commission extend to other regulated utilities certain requirements that the Company agreed with CUB and Energy CENTS Coalition in our 2023 Safety, Reliability and Service Quality (SRSQ) Annual Report (Docket No. E002/M-24-27). The Company documented those agreements in a compliance filing in early 2025, where we provided a *Minnesota Disconnection Process* document that reflects the changes agreed to in the 2023 SRSQ docket.¹ We made that *Minnesota Disconnection Process*

¹ *In the Matter of Northern States Power Company d/b/a Xcel Energy's 2023 Annual Safety, Reliability, and Service Quality Report*, Docket Nos. E002/M-24-27 and E,G002/PR-24-02, CORRECTED COMPLIANCE FILING (March 3, 2025).

available on the Company's website in two easy-to-find locations.² Finally, we discussed these changes in detail in our 2024 SRSQ Annual Report.³

While the Department “sees value in the reporting requirements that CUB/LSAP and Xcel developed in that proceeding, even going so far as to support a settlement between the parties, the Department would like to see that process work for some period before extending it to the state's other regulated utilities.”⁴ The Company appreciates the Department's support and does not take a position on requirements for other utilities.

The Department also recommends that the Commission “require Xcel to track the effects of the recently approved service disconnection, payment arrangements and various customer protections and assistance, the effects of those changes on Xcel's bad debt expense and to provide that information to the Commission in a compliance filing containing one year of actual data.”⁵

The Company has no objection to continued reporting. We expect to report on disconnection, payment arrangements and other metrics for a full year in our 2025 SRSQ Annual Report, to be filed April 1, 2026. We also report on disconnections, reconnections, past-due balances, payment arrangements, and many other metrics – monthly throughout the year, and weekly during the Cold Weather Rule months – in Docket No. E,G999/PR-25-2. We do not report on bad debt in those dockets.

We do not expect to be able to disaggregate the impacts on disconnections, payment arrangements, bad debt, and other metrics of the changes to our *Minnesota Disconnection Process* agreed to in the 2023 SRSQ docket, from the many other social and economic variables that impact those same metrics. To do that would require an experimental design in which some customers are treated as a “control” group, otherwise similar but not receiving the new protections; we do not believe that would be appropriate. But we will continue to report the status of those metrics, which can be compared to the same metrics prior to the changes to our *Minnesota Disconnection Process*.

² See <https://mn.my.xcelenergy.com/s/billing-payment/energy-assistance/pay-arrangements> and <https://mn.my.xcelenergy.com/s/billing-payment/manage-bill>.

³ *In The Matter Of Northern States Power Company's Annual Report On Safety, Reliability, And Service Quality For 2024; And Petition For Approval Of Electric Reliability Standards For 2025*, Docket No. E002/M-25-27, ANNUAL REPORT AND PETITION, Part III, pages 107-110 (April 1, 2025).

⁴ *In the Matter of Recent Utility Cold Weather Reports (CWR) Rule Data*. Docket No. E,G999/PR-25-2, Comments of the Minnesota Department of Commerce, page 4 (May 14, 2025). Hereafter “Department Comments.”

⁵ Department Comments at page 10.

2. Making Disconnection and Payment Arrangement Policies Public

The Department next responds to a question, “should utilities be required to develop disconnection and payment arrangement policies and make them public? Once the policies are developed, should there be any other modifications made to them?” The Department recommends that the Commission impose such requirements “only if an analysis of each utility’s disconnection, payment arrangement policies and practices demonstrate it has not managed its disconnection and complaint processes competently for the reasons listed in the Department’s response to the previous question.”⁶

The Company was happy to make these policies public, and will modify the public versions in the event of future changes to the policies. We take no position on requirements for other utilities.

3. Analyses on Equitable Delivery of Utility Service

In section III.C.3 of its Comments, the Department discusses the analyses by Drs. Pradhan and Chan, and by TRC Companies, filed in the Company’s 2023 SRSQ Annual Report docket.⁷ Those analyses examined reliability metrics, including CELI-12 (the percentage of customers experiencing an outage longer than 12 hours) and CEMI-6 (the percentage of customers experiencing 6 or more outages in a year), as well as involuntary service disconnections, in different Census Block Groups across the Company’s Minnesota electric service territory. The Company discussed those studies in detail in the 2023 SRSQ docket and in our 2024 SRSQ Annual Report.⁸

The Department concludes that:

If the Commission wants to require regulated utilities to develop these analyses, then it should require the utilities to provide the information TRC listed as having used in its equity study, assuming Commission Staff can perform the required linear regression analyses. In the alternative, the Commission could ask the different utilities to provide comments on the

⁶ Department Comments at page 6.

⁷ See Pradhan, Bhavin and Gabriel Chan. 2024. *Racial and Economic Disparities in Electric Reliability and Service Quality in Xcel Energy’s Minnesota Service Area*. See <https://hdl.handle.net/11299/261434>. See also Close, Brett. TRC Companies. *Service Quality and Demographics Analysis*. Filed in Docket No. E002/M-24-27, ANNUAL REPORT AND PETITION, Attachment Q, (April 1, 2024).

⁸ *In The Matter Of Northern States Power Company’s Annual Report On Safety, Reliability, And Service Quality For 2024; And Petition For Approval Of Electric Reliability Standards For 2025*, Docket No. E002/M-25-27, ANNUAL REPORT AND PETITION, Part III (April 1, 2025).

*relative difficulty of gathering the information listed above and to perform the linear regression analysis needed and to provide that information in a compliance filing.*⁹

The Company has provided the studies, and discussed in our 2024 SRSQ Annual Report, Part III the actions we are taking to better understand and address the identified disparities in CELI-12 and involuntary service disconnections. This will be an ongoing effort, reported on as well in our 2025 SRSQ Annual Report. In addition, consistent with the Commission's January 13, 2025 Order in Docket No. E002/M-24-27, the Company will be refreshing the TRC analysis when we file our 2026 SRSQ Annual Report; that Order requires the Company to "conduct a study similar to the TRC Service Quality and Demographics Analysis on a three-year cycle with the next report due on April 1, 2027, with its safety, reliability, and service quality report."¹⁰

We take no position whether other utilities should be required to conduct similar studies.

4. Information on Disconnection and Payment Arrangement Policies for non-English Speakers

In section III.C.4 of its Comments, the Department addresses how utilities currently communicate information on disconnection and payment arrangement policies to non-English speakers, especially to people that do not read their native language. The Department describes MERC's response to this question, which it finds adequate, and requests that other utilities provide this information in supplemental comments.

The Company notes that:

- We provide all disconnect warnings and payment arrangement letters in both English and Spanish.
- As noted by MERC, Google Chrome has the capability to translate any web page.
- When speaking with customers over the phone, the Company employs some Bilingual Care agents. We also use a Language Line service that provides translation for any other language that customers may speak.

⁹ Department Comments at page 8.

¹⁰ *In the Matter of Xcel Energy's 2023 Annual Safety, Reliability and Service Quality Report*, Docket No. E002/M-24-27, ORDER ACCEPTING REPORTS AND SETTING ADDITIONAL REQUIREMENTS, Order Point 43 (January 13, 2025).

5. Cold Weather Rule Appeals Process

In section III.C.5 of its Comments, the Department discusses the Company's description of how we comply with the Cold Weather Rule (CWR) appeals process required by *Minn. Stat. § 216B.096, subd. 8*. The Department believes the Company is following this process, but will review other parties' comments and file supplemental comments on this topic. The Company is aware of no comments to date from other parties suggesting the Company is not complying with *Minn. Stat. § 216B.096, subd. 8*.

6. Protections for Heat-Affected Customers

In section III.C.6 of its Comments, the Department discusses:

Are utilities' heat-affected customers, particularly for customers with electricity service necessary to operate gas heating equipment, being provided with appropriate protections during CWR season (October 1 – April 30), including site visits before any disconnections or non-payment? How are utilities ensuring that its records of heat-affected customers are accurate?

The Department describes MERC's response to this question, which it finds adequate, and requests that other utilities provide this information in supplemental comments.

Premises are noted in the Company's customer database whether heat affected or not heat affected. All single-family homes are assumed to be heat affected. For other building types that are not single-family homes, the Company's field personnel verify all properties to determine if a customer is heat affected or not. If a premise's heat source has not been determined, it is treated as heat affected until determined otherwise through a field visit.

7. Conclusion

The Company is pleased to provide these Supplemental Comments addressing requests from the Department in its May 14, 2025 Comments in this docket. 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 me at Nicholas.f.martin@xcelenergy.com or (612) 330-6255 or Christine Schwartz at christine.e.schwartz@xcelenergy.com or (612) 330-6193 if there are any questions regarding this submission.

Sincerely,

/s/

NICHOLAS MARTIN
DIRECTOR, STRATEGIC OUTREACH & ADVOCACY

cc: Service List

CERTIFICATE OF SERVICE

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

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

xx electronic filing

Docket No. E,G999/PR-25-2

Dated this 23rd day of July 2025

/s/

Christine Schwartz
Regulatory Administrator

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	PR-25-2
2	Ryan	Baumtrog	ryan.baumtrog@state.mn.us		Minnesota Dept of Housing	400 Wabasha St N Ste 400 St. Paul MN, 55102 United States	Electronic Service		No	PR-25-2
3	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	PR-25-2
4	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	PR-25-2
5	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	PR-25-2
6	Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 St. Paul MN, 55101 United States	Electronic Service		No	PR-25-2
7	Beverly	Dahlberg	bevdahlberg@nweco.com	Northwestern Wisconsin Electric Co.		104 South Pine Street P O Box 9 Grantsburg WI, 54840-0009 United States	Electronic Service		No	PR-25-2
8	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	PR-25-2
9	Ron	Elwood	relwood@mnlisap.org	Legal Services Advocacy Project		970 Raymond Avenue Suite G-40 Saint Paul MN, 55114 United States	Electronic Service		No	PR-25-2
10	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	PR-25-2
11	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	PR-25-2
12	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	PR-25-2
13	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	PR-25-2
14	Jack	Kegel	jkegel@mmua.org	MMUA		3025 Harbor Lane N Suite 400 Plymouth MN,	Electronic Service		No	PR-25-2

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55447-5142 United States				
15	Collin	Kremeier	ckremeier@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	PR-25-2
16	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	PR-25-2
17	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	PR-25-2
18	Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	PR-25-2
19	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	PR-25-2
20	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	PR-25-2
21	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	PR-25-2
22	Jodi	Schinzing	jodischinzing@nweco.com	Northwestern Wisconsin Electric Company		104 S. Pine Street Grantsburg WI, 54840 United States	Electronic Service		No	PR-25-2
23	Lori	Schultz	lorischultz@minncap.org	Minnesota Community Action Partnership		MCIT Building 100 Empire Dr Ste 202 St. Paul MN, 55103 United States	Electronic Service		No	PR-25-2
24	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	PR-25-2
25	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	PR-25-2