

STATE OF MINNESOTA
BEFORE THE PUBLIC UTILITIES COMMISSION

Katie Sieben	Chair
Joseph Sullivan	Vice-Chair
Hwikwon Ham	Commissioner
Audrey Partridge	Commissioner
John Tuma	Commissioner

In the Matter of Northern States Power
Company d/b/a Xcel Energy's Electric 2024
Annual Safety, Reliability, and Service Quality
Report

Docket No. E-002/M-25-27

**Reply Comments of the Citizens Utility Board of Minnesota,
the Legal Services Advocacy Project, and the Energy CENTS Coalition**

The Citizens Utility Board of Minnesota ("CUB"), the Legal Services Advocacy Project ("LSAP"), and the Energy CENTS Coalition ("ECC") respectfully submit these reply comments in response to the Minnesota Public Utilities Commission's ("Commission") Notice of Extended Comment Period issued on April 24, 2025 in the above-referenced matter.

I. INTRODUCTION

Extreme heat and unhealthy air quality pose significant risks to the health and well-being of Minnesotans. Between 2000 and 2023, excessive heat directly contributed to 77 deaths and nearly 1,800 hospitalizations across the state.¹ The Minnesota Pollution Control Agency ("MPCA") and the Minnesota Department of Health ("MDH") likewise report that in 2015, air pollution played a role in approximately 10 percent of deaths in the Twin Cities metro area, and 9 percent of deaths in Duluth, Rochester, and Saint Cloud.² As the prevalence of extreme heat and poor air quality continue to increase, actions must be taken to protect Minnesotans.

In recognition of these harms, the Commission ordered Northern States Power Company d/b/a Xcel Energy ("Xcel" or the "Company") to develop a proposal to utilize its advanced metering infrastructure ("AMI") to reconnect customers during periods of extreme heat or unhealthy air quality.³ CUB, LSAP,

¹ MINN. DEP'T OF HEALTH, Heat-Related Deaths, https://data.web.health.state.mn.us/heat_deaths (last updated May 2024); MINN. DEP'T OF HEALTH, Heat-Related Hospitalizations, https://data.web.health.state.mn.us/heat_hospitalizations#byyear (last updated July 2024).

² MPCA, *The Air We Breathe* at 4-5 (Jan. 2025).

³ *In the Matter of Northern States Power Company d/b/a Xcel Energy-Electric's Petition Requesting Approval of Changes to its Tariff and an Indefinite Variance to Commission Rules Regarding Disconnection of Service*, Docket No. E-002/M-22-233, Order Approving Petition as Modified and Requiring Filings at 9 (Mar. 22, 2023) (hereinafter "Order Requiring Extreme Heat Reconnection Proposal"); *In the Matter of Xcel Energy's 2023 Annual Safety, Reliability, and Service Quality Report*, Docket No. E-002/M-24-27, Order Accepting Reports and Setting Additional Requirements at 12-13 (Jan. 13, 2025) (requiring both extreme heat and air quality reconnection proposals) (hereinafter "Order on Xcel's 2023 SRSQ").

and ECC submitted comments on Xcel's proposal, along with the Minnesota Department of Commerce ("Department") and the Office of the Attorney General ("OAG"). We continue to believe minor revisions to the Company's proposal are necessary to shield Minnesotans from the harmful effects of extreme heat and unhealthy air quality.

II. ANALYSIS

A. There is no need for additional record development surrounding the appropriate threshold for implementing extreme weather protections.

The Minnesota Department of Commerce ("Department") recommends that the Commission refrain from adopting extreme heat and air quality protections until the record is further developed.⁴ MDH supports the Department's recommendation that Xcel be required to consult with MDH and MPCA to develop common terminology and establish appropriate thresholds for ratepayer protections.⁵

CUB, LSAP, and ECC respectfully, but firmly, disagree with this conclusion. We greatly appreciate the role of MDH and MPCA in safeguarding Minnesotans from health and pollution risks, but do not believe further delaying the implementation of these protections is warranted.

The current record in this docket provides ample evidence to demonstrate the harms that extreme heat and poor air quality pose to Minnesotans—especially vulnerable populations—and to support the extreme weather protections and thresholds recommended by parties. As further detailed below, we believe there is a pathway forward that both allows these protections to be implemented and enables MDH and MPCA to play a pivotal role in facilitating public awareness.

1. Extreme heat protections should be aligned with statutory thresholds.

Xcel is statutorily obligated to pause involuntary disconnections of residential customers whenever an extreme heat event is called by the National Weather Service.⁶ While the Department recognizes that "apply[ing] the same model" to reconnections "appears to be a reasonable expansion of [the Company's] current processes," it nonetheless recommends denial of Xcel's proposal.⁷ Instead of enabling these protections, the Department requests further record development in consultation with MPCA and MDH to "establish common terminology" to determine a reasonable threshold for implementing extreme heat reconnections.⁸

The record in this docket is sufficient to move forward and approve Xcel's proposal as modified herein. Much of the data, evidence, and positions in the record are already derived from information publicly reported by MDH, MPCA, and other governmental agencies. While CUB, LSAP, and ECC would value

⁴ *In the Matter of Northern States Power Company d/b/a Xcel Energy's Electric 2024 Annual Safety, Reliability, and Service Quality Report*, Docket No. E-002/M-25-27, Comments of the Minnesota Department of Commerce at 7 (May 9, 2025) (hereinafter "Department Comments").

⁵ *In the Matter of Northern States Power Company d/b/a Xcel Energy's Electric 2024 Annual Safety, Reliability, and Service Quality Report*, Docket No. E-002/M-25-27, Letter of the Minn. Dep't of Health at 3 (May 30, 2025) (hereinafter "MDH Letter").

⁶ Minn. Stat. § 216B.0975.

⁷ Department Comments at 4.

⁸ Department Comments at 3-4.

the insights these agencies could provide through consultation, there is no reason to delay implementation solely for their input.

CUB, LSAP, and ECC did not previously weigh in on the appropriate threshold for extreme heat protections, given that these parameters are already established by statute. Pursuant to Minn. Stat. § 216B.0975, utilities must halt disconnections whenever “an excessive heat watch, heat advisory, or excessive heat warning issued by the National Weather Service [“NWS”] is in effect.”⁹ NWS defines extreme heat as “a period of abnormally hot and dangerous temperatures, with or without high humidities, that can result in negative impacts to people, animals, and infrastructure.”¹⁰ Warnings are issued when “extremely dangerous heat is expected or occurring” and watches are issued when “conditions are favorable for an extreme heat event but its occurrence, location, and/or timing is still uncertain.”¹¹

As MDH emphasizes in its Letter, the definitions and terminology used in developing extreme heat protections should recognize local conditions and utilize the best available data.¹² We concur with MDH. While the definitions employed by NWS are broadly applicable across the country, the criteria for issuing warnings varies by locality, with MDH noting that “regional climate patterns, historical temperature norms, and local environmental factors” are all considered when determining whether a given locality is facing an extreme heat event.¹³ As detailed below, MDH already provides an extensive overview of when and how extreme heat events are called in Minnesota, and we believe these definitions represent the most accurate, localized, and effective means of ensuring Minnesotans are protected against the harmful effects of extreme heat.¹⁴

⁹ Minn. Stat. § 216B.0975.

¹⁰ NAT’L WEATHER SERVICE, *National Weather Service Glossary*, <https://forecast.weather.gov/glossary.php?letter=e> (last visited May 12, 2025) (defining “extreme heat”).

¹¹ *Id.* (defining “extreme heat warning,” and “extreme heat watch”).

¹² MDH Letter at 3-4.

¹³ MDH Letter at 3.

¹⁴ MINN. DEP’T OF HEALTH, MINNESOTA EXTREME HEAT TOOLKIT at 1-7 (Jun. 6, 2012) (included in its entirety as “Attachment A”).

Table 1: Definitions of heat watch, advisory, and warning¹

	In Hennepin/Ramsey Counties	Outside Hennepin/Ramsey Counties
Excessive Heat Watch		
Excessive Heat Watches are issued when conditions are favorable for an excessive heat event in the next 12 to 72 hours. A Watch is used when the risk of a heat wave has increased but its occurrence and timing is still uncertain. A watch provides enough lead time so that those who need to prepare can do so, such as city officials who have extreme heat response plans.	In Hennepin and Ramsey counties a heat watch is defined as: Maximum heat index at Minneapolis/St. Paul International Airport is expected to reach 100°F or greater for 1 day, or the maximum heat index is expected to reach 100°F or greater and an overnight low temperature no cooler than 75°F for 2 days in a row. In addition, the Heat Watch/Warning System must recommend a watch.	Outside Hennepin and Ramsey counties a heat watch is defined as: Maximum heat index reaches 105°F or greater and a minimum heat index of 75°F or greater for at least 48 hours.
Heat Advisory		
Heat Advisories are issued when an extreme heat event is expected in the next 48 hours. These statements are issued when an extreme heat event is occurring, is imminent, or has a very high probability of occurring. An advisory is for less serious conditions that cause significant discomfort or inconvenience and, if caution is not taken, could lead to a threat to life and/or property.	In Hennepin and Ramsey counties a heat advisory is defined as: Maximum heat index at Minneapolis/St. Paul International Airport is expected to reach 95°F or greater for 1 day, or the maximum heat index is expected to reach 95°F or greater and an overnight low temperature no cooler than 75°F for 2 days in a row.	Outside Hennepin and Ramsey counties a heat advisory is defined as: Maximum heat index reaches 100°F and/or the maximum temperature reaches 95°F or higher.
Excessive Heat Warning		
Excessive Heat Warnings are issued when an extreme heat event is expected in the next 48 hours. These statements are issued when an extreme heat event is occurring, is imminent, or has a very high probability of occurring. A warning is used for conditions posing a threat to life or property.	In Hennepin and Ramsey counties a heat warning is defined as: Maximum heat index at Minneapolis/St. Paul International Airport reaches 100°F or greater for at least 1 day. In addition, the Heat Watch/Warning System, a tool developed based on research, must recommend a warning. A warning may also be issued if advisory criteria are expected for 4 days in a row.	Outside Hennepin and Ramsey counties a heat warning is defined as: Maximum heat index reaches 105°F or greater and a minimum heat index of 75°F or greater for at least 48 hours. A warning may also be issued if advisory criteria are expected for 4 days in a row.

¹ National Weather Service (2012)

Thus, contrary to the Department's assertion, common terminology and definitions have already been established by government agencies for extreme heat events. These definitions are employed to effectuate the statutory protections in Minn. Stat. § 216B.0975 and can be reasonably applied to reconnect customers during periods of extreme heat. In fact, the Commission utilized this statutory framework—and by extension, MDH's definitions—when it directed Xcel to develop an extreme heat reconnection proposal over two years ago:

[T]he Commission acknowledges Xcel Energy's commitment to its statutory obligations to . . . avoid disconnections during periods of extreme heat (as stated in Minn. Stat. §

216B.0975). The Commission notes, however, that [Minn. Stat. § 216B.0975] does not specifically address the need to restore service—even temporarily—during periods of extreme heat. . . . Accordingly, the Commission will direct the Company to present a proposal for using the capacity of its advanced metering infrastructure to restore electric service to customers during periods of extreme heat.¹⁵

Thereafter, the Commission reaffirmed the use of these thresholds when it directed Xcel to file a reconnection plan in the instant docket.¹⁶ In essence, the Commission has already rendered a decision on the reasonableness of employing these statutory thresholds for reconnecting customers. We recommend that these thresholds and definitions continue to be used, as contemplated by Xcel's current proposal.

2. Air quality protections should be set at a threshold AQI of 151 or higher.

The Department suggests that further record development should be required prior to determining an appropriate threshold for air quality reconnections. While we agree that setting the AQI threshold too high would threaten the “health and safety of Xcel's most vulnerable populations,”¹⁷ we do not believe that additional record evidence is necessary to establish protection thresholds. CUB, LSAP, and ECC continue to recommend an AQI threshold of 151 or higher for both disconnection and reconnection protections.

Xcel's current proposal employs separate AQI thresholds of 151 (Unhealthy) for halting residential disconnections and 201 (Very Unhealthy) for reconnecting customers whose service has been shut off.¹⁸ While we support Xcel's threshold for suspending disconnections, its reconnection threshold is unreasonably high. As detailed in our initial comments, only five days in Minnesota history have surpassed an AQI of 200.¹⁹ Employing such an elevated threshold for reconnection would effectively perpetuate the status quo and be insufficient to ameliorate the harms of unhealthy air quality or protect the health and lives of affected ratepayers.

Given that an AQI threshold of 201 or higher is unreasonable for implementing air quality reconnections, the Commission is essentially left with two options: (1) utilize an AQI threshold of 101; or (2) adopt CUB, LSAP, ECC, and OAG's recommendation for an AQI threshold of 151 or higher.²⁰

¹⁵ Order Requiring Extreme Heat Reconnection Proposal at 9.

¹⁶ Order on Xcel's 2023 SRSQ at 12.

¹⁷ Department Comments at 4.

¹⁸ *In the Matter of Northern States Power d/b/a Xcel Energy's 2024 Annual Safety, Reliability, and Service Quality Report*, Docket No. E002/M-25-27, Annual Report and Petition, Part III at 96 (Apr. 1, 2025) (hereinafter “Xcel 2024 SRSQ Report”).

¹⁹ *In the Matter of Northern States Power Company d/b/a Xcel Energy's Electric 2024 Annual Safety, Reliability, and Service Quality Report*, Docket No. E-002/M-25-27, CUB, LSAP, and ECC Initial Comments at 4 (May 9, 2025) (hereinafter “CUB, LSAP, and ECC Initial Comments”).

²⁰ CUB, LSAP, and ECC Initial Comments at 3-4; *In the Matter of Northern States Power Company d/b/a Xcel Energy's Electric 2024 Annual Safety, Reliability, and Service Quality Report*, Docket No. E-002/M-25-27, Comments of the Office of the Attorney General – Residential Utilities Division at 3-6 (May 9, 2025) (hereinafter “OAG Initial Comments”).

Anything below these thresholds is associated with “Good” or “Moderate” air quality and would not trigger an alert from MPCA.²¹

AQI scores between 101 and 150 are designated as “Unhealthy for Sensitive Groups,” such as children, older adults, pregnant people, and those living with underlying health conditions that render them especially prone to air quality risks.²² Generally, persons without the aforementioned characteristics are not susceptible to health impacts from AQIs at this level unless they are active outdoors and are exposed for an extended period of time.²³ Setting an AQI reconnection threshold at 101 or higher would result in protections being deployed more regularly, but could drive up aggregate costs. Since 2021, there have been 84 days when the maximum AQI in Minnesota exceeded 100.²⁴

AQIs of 151 – 200 are associated with “Unhealthy” air quality for all people, with members of sensitive groups experiencing more serious health effects.²⁵ At this threshold, MDH recommends that school and childcare staff keep children indoors and cancel or reschedule all outdoor activities.²⁶ The Environmental Protection Agency (“EPA”) further suggests that sensitive groups should completely avoid prolonged activity, and that otherwise healthy individuals reduce exertion and take more breaks while outdoors.²⁷ Since 2021, there have been 25 days when the maximum AQI in Minnesota exceeded 150.

CUB, LSAP, and ECC continue to recommend that an AQI threshold of 151 be employed for both air quality disconnection and reconnection protections. As recognized by the Department and Xcel, there is no category of “high” air quality alert, as referenced in the Commission’s order in Docket No. E-002/M-24-27.²⁸ However, the directive to develop a proposal for reconnecting customers during “high” air quality events was premised on the arguments presented by CUB and ECC in that docket, which equated “high . . . air quality” to “situations where an AQI alert of 151 (red) or higher is issued.”²⁹ The guidance provided by MDH and the EPA for AQIs of 151 or above further reinforces this threshold. Minnesotans are warned to stay inside and avoid prolonged exposure, which may not be possible if windows are kept open to keep homes cool.³⁰ Restoring electricity service when the AQI is 151 or higher would allow air conditioning, fans, and filtration systems to be used, enabling households to

²¹ See, e.g., Department Comments at 4 (citing MPCA, *Understanding the AQI*, <https://www.pca.state.mn.us/air-water-land-climate/understanding-the-air-quality-index-aqi> (last visited May 12, 2025) (stating that alerts are issued when AQI reaches or is expected to reach 101 or above).

²² MPCA, 2025 AIR MONITORING NETWORK PLAN FOR MINNESOTA at 16 (Jun. 2024); AM. LUNG ASSOC., STATE OF THE AIR 29-31 (2025).

²³ EPA, Air Quality Index: A Guide to Air Quality and Your Health at 3 (Feb. 2014) (including “people who are active outdoors” in the list of sensitive groups).

²⁴ MPCA, Air Quality Index Application, <https://webapp.pca.state.mn.us/aqistats/calendar> (last visited May 12, 2025).

²⁵ MPCA, 2025 AIR MONITORING NETWORK PLAN FOR MINNESOTA at 16 (Jun. 2024).

²⁶ Minn. Dep’t of Health, Minnesota Outdoor Air Quality Guidance for Schools and Child Care (Jun. 2024).

²⁷ EPA, Patient Exposure and the Air Quality Index, <https://www.epa.gov/pmcourse/patient-exposure-and-air-quality-index> (last visited May 12, 2025).

²⁸ Xcel 2024 SRSQ Report, Part III at 96, Department Comments at 5.

²⁹ *In the Matter of Northern States Power Company d/b/a Xcel Energy’s Electric 2023 Annual Safety, Reliability, and Service Quality Report*, Docket No. E-002/M-24-27, Initial Comments of the Joint Commenters at 3-4 (Jun. 14, 2024).

³⁰ See MPCA, *Air Quality Alert Issued Immediately Due to Wildfire Smoke for All of Minnesota* (May 12, 2024) (including “[p]eople who don’t have air conditioning and need to keep windows open to stay cool” among those with increased exposure to unhealthy air quality).

close their windows and take the necessary precautions to protect themselves from the harmful effects of unhealthy air quality.

Sensitive populations that are prone to negative health impacts can receive additional protection even when AQIs fall short of this threshold. As explained by Xcel, the medical certification process allows “customers who have sensitivities to excessive heat or poor air quality” to avoid disconnection regardless of whether an air quality event is called.³¹ In this way, we envision medical certification and air quality-specific protections as working in tandem. Medically certified customers are protected at all AQIs, including those between 100 and 150. Once AQIs of 151 or higher are reached—when air quality is unhealthy for all—protections are broadened to include all customers.

Lastly, MDH notes that states across the country are considering whether to reevaluate AQI thresholds to account for the particularly harmful effects of wildfire smoke, which research indicates could be up to 10 times more toxic than fossil fuel pollution.³² If changes are ultimately made to how AQI events are called, we believe it would be appropriate to revisit these thresholds at that point in time. However, further delaying implementation until those conversations play out would only serve to deprive Minnesotans of lifesaving protections in the near-term.

CUB, LSAP, and ECC find that employing an AQI threshold of 151 or higher for air quality protections strikes a reasonable balance that both safeguards residential customers and limits administrative burdens and costs for the Company. We therefore recommend the Commission adopt this threshold for both pausing disconnections and reconnecting customers.

B. Xcel must justify its cost estimates and employ practices to mitigate protection-related expenses.

In its evaluation of Xcel's proposal, OAG identified several concerns that indicate Xcel's cost estimates may be overstated. While we recognize and appreciate Xcel's attempt to preliminarily quantify expenses associated with implementing a Commission order in this docket, we share OAG's wariness about the accuracy of these cost estimates. Several of the Company's assumptions related to customer reconnection counts, methods of communication, and staffing should be revised to provide a more accurate depiction of relevant expenditures. We recommend Xcel be required to submit an additional compliance filing detailing its expenses after accounting for any changes ordered by the Commission. As further discussed below, we believe several revisions to the Company's proposal will help to substantially mitigate anticipated costs.

1. The Company's estimates likely overstate the costs associated with implementing extreme heat and air quality protections.

Xcel's response to a Department information request suggests that its estimate of \$360,000 in up-front investments may be overstated.³³ In that response, the Company clarified that its estimates were

³¹ Xcel 2024 SRSQ Report, Part III at 102.

³² MDH Letter at 4.

³³ Xcel 2024 SRSQ Report, Part III at 101.

separately applicable to both extreme heat and air quality protections, essentially doubling the costs associated with development.³⁴ However, many of the steps taken to build communication channels can be used for both air quality and heat events. Given this anticipated overlap, we question whether full duplication of development costs is appropriate.

Xcel's estimate of a minimum of \$160,000 in staffing costs per event may be overstated, as well.³⁵ CUB, LSAP, and ECC share OAG's understanding that Xcel's current estimates are modeled on the assumption that the Company will individually call 19,000 customers to receive verbal confirmation that safety precautions have been taken prior to facilitating reconnection.³⁶ There are several fundamental issues associated with this premise that cause us to question the reasonableness of Xcel's per-event costs. First, as OAG explained, Xcel does not provide any justification for its customer count.³⁷ Because the Company's costs are estimated based on the number of households without service during an extreme heat or air quality event, the accuracy of these figures is paramount to calculating anticipated expenses. We agree with OAG that more information should be provided by the Company to justify these numbers.

Second, Xcel's proposal to manually call all customers to verify safety precautions have been taken prior to reconnection is unreasonable. Our understanding is that the Company does not currently call customers when initiating reconnection, so this proposed practice is entirely new. In fact, Xcel raised this issue for the first time at the Commission's hearing on Docket No. E-002/M-24-27, which resulted in the requirement that Xcel file updated information in the instant docket fully outlining the process for reconnecting customers.³⁸ While we appreciate the need to develop reasonable reconnection parameters, the Company's proposal to individually call customers is burdensome and makes it more difficult for customers to secure necessary protections. Further, while the Company has not provided an in-depth analysis of its cost estimates, it appears that the \$157,000 per-event expense is almost entirely driven by the staffing needed to facilitate these calls.³⁹

As recommended by OAG, alternatives could be utilized that mitigate these expenses. Verification could be confirmed by "signing an electronic form, responding to a text message or email, clicking a box on MyAccount or Xcel's website, or receiving an automated call and responding with a touch tone to confirm an action."⁴⁰ Each of these processes would streamline customer communications and significantly drive down per-event costs, as both staffing and call recording needs would be reduced. We strongly recommend that Xcel be required to pursue these alternatives as preferred methods of communication.

³⁴ See Xcel Response to Department Information Request 007 (included in OAG Initial Comments as Att. E).

³⁵ Xcel 2024 SRSQ Report, Part III at 101.

³⁶ OAG Initial Comments at 7-9, 15-16.

³⁷ OAG Initial Comments at 15-16.

³⁸ See Minnesota Public Utilities Commission, Recorded Webcast of November 7, 2024 Hearing, at 37:40:00, available at https://minnesotapuc.granicus.com/player/clip/2447?view_id=2&redirect=true.

³⁹ Xcel 2024 SRSQ Report, Part III at 101; Xcel Response to Department Information Request 002 (included in OAG Initial Comments as Att. B).

⁴⁰ OAG Initial Comments at 9.

Lastly, Xcel does not acknowledge the substantial likelihood that extreme heat and unhealthy air quality events will coincide, as rising temperatures contribute to higher concentrations of air pollution. As the Company moves forward with developing its budget and its outreach plans, we recommend that “combined” messaging be instituted to account for this possibility. Under this approach, a single message would be used to notify customers that an extreme heat and/or air quality alert has been issued in their geographic area, and that reconnection protections are available. This would avoid unnecessary duplication, lower per-event costs, and reduce customer confusion.

Ultimately, CUB, LSAP, and ECC find Xcel’s current cost estimations are insufficiently supported and could be substantially mitigated by streamlining communications and avoiding unnecessary duplication of outreach strategies. As further detailed below, we agree with OAG that Xcel should be required to submit updated cost estimates via a compliance filing if the Company’s reply comments are not adequately responsive to these concerns.

2. The Commission should require Xcel to submit a compliance filing detailing its estimated expenses, as modified by the measures recommended herein.

OAG recommends that Xcel be required to update its cost estimates and submit a compliance filing with the revised information within 30 days of the Commission’s order in the instant docket.⁴¹ CUB, LSAP, and ECC support this approach and further recommend that the Company be required to share its outreach and communications strategies at the same time.

Although CUB, LSAP, and ECC previously suggested the Commission provide the Company with 60 days to outline its outreach and communications strategies, we believe it would be more reasonable and prudent to establish a 30-day deadline that coincides with the filing of cost estimates. As detailed above, any revisions to the pre-event communication channels employed by Xcel are likely to materially impact the amount of expenses incurred by the Company. As always, the Commission has authority over the recovery of costs and revenues from Xcel’s customers, and the Company bears the burden of proving its expenses are reasonable. By filing these documents together, the Commission and stakeholders will be better able to evaluate Xcel’s revised proposal.

Lastly, we believe that MDH and MPCA could play a pivotal role in Xcel’s outreach and communications efforts. These respected agencies provide a wide breadth of information to Minnesotans on how to safeguard themselves from extreme heat and air pollution, and could provide details about the protections ultimately adopted by the Commission in their own communications including, but not limited to, press releases and information hosted on their respective websites. We encourage Xcel to engage with MDH and MPCA in the development of these communication protocols.

III. CONCLUSION

In summary, CUB, LSAP, and ECC appreciate the efforts of Xcel, the Department, MDH, and OAG to develop a reasonable framework for instituting lifesaving protections for residential customers during

⁴¹ OAG Initial Comments at 17.

periods of extreme heat and unhealthy air quality. We recommend the Commission take the following actions to ensure those protections are effectively and efficiently implemented:

1. Approve Xcel's proposal to remotely reconnect disconnected customers during excessive heat watches, heat advisories, and excessive heat warnings subject to the following modifications:
 - a. Require Xcel to implement remote reconnection protections by May 1, 2026 at the latest.
2. Approve Xcel's proposal to remotely reconnect customers during unhealthy air quality events, subject to the following modifications:
 - a. Require Xcel to reconnect disconnected customers when AQI alerts of 151 or higher have been issued.
 - b. Require Xcel to implement remote reconnection protections by May 1, 2026 at the latest.
3. Require Xcel to immediately begin suspending residential customer disconnections when air quality alerts of 151 or higher have been issued.
4. Require Xcel to develop a "combined" communication channel for both extreme heat and air quality event communications.
5. Require Xcel to pursue alternative methods of contacting customers instead of individual phone calls (i.e. automated voice messaging, email, texting, or MyAccount communications).
6. Require Xcel to submit a compliance filing within 30 days of the publication of this Order updating its cost estimates and detailing its communication and outreach strategies for informing customers of extreme heat and air quality protections.
7. Require Xcel to consult with MDH and MPCA about whether AQI changes or advancements in the understanding of health impacts from air pollution and extreme heat might warrant modification of protection thresholds. Require Xcel to report on these discussions in future SRSQ reports, together with any modifications proposed by the Company or agencies.
8. Require Xcel to include in future annual SRSQ reports (1) the number of extreme heat and air quality events called; (2) the number of customers eligible for extreme heat and air quality protections during each event; (3) the number of customers whose disconnections were suspended; and (4) the number of customers who were reconnected during each event. Such information will be provided both in the aggregate and by county, and will be incorporated into the Company's service quality map to the extent feasible.

Sincerely,

June 3, 2025

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