

August 10, 2017

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G002/M-17-553

Dear Mr. Wolf:

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

Northern States Power Company, doing business as Xcel Energy (Xcel or the Company)'s petition for approval to change its tariffs and a variance from Commission's rules related to operational changes intended to align with changing customers' expectations and preferences.

The Petition was filed on July 14, 2017 by:

Mara K. Ascheman
Senior Attorney
Northern States Power Company, d/b/a Xcel Energy
414 Nicollet Mall
Minneapolis, MN 55401

The Department recommends that the Minnesota Public Utilities Commission (Commission):

- **Approve** the petition for changes to the RDF Rider description contained in Xcel's Natural Gas and Electric Rate Books;
- **Approve** the petition for variance to Minn. R. 7826.0800 to allow the communication with customers by phone and email;
- **Approve** the petition for Call Center non-emergency schedule change contingent upon two years' annual compliance review; and
- **Approve** the petition to add text messages/short message service (SMS) to the Company's eBill and eBill Payment Terms and Use contingent upon notifying customers that text rate from their phone company may apply.

The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ CHARLES AMEVO
Financial Analyst
651-539-1819

CA/lt
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. G002/M-17-553

I. BACKGROUND INFORMATION

On July 14, 2016, Northern States Power Company, doing business as Xcel Energy (Xcel or the Company), filed a petition to the Minnesota Public Utilities Commission (Commission) for approval to change its tariff and for a variance from the Commission's Rules related to their call center hours of operation, their current eBill and eBill Payment Terms of Use contained in their Electric and Natural Gas Rate Books, and their planned outages communication to customers.

In addition, Xcel requested that the Commission approve their proposed changes to the Renewable Development Fund (RDF) Rider description contained in their Natural Gas and Electric Rate Books.

II. SUMMARY OF THE FILING

Xcel's petition indicates that, since 2010, Xcel has been expanding digital channels through which customers can transact with and access information, such as to view and pay their bills, start and stop service, and report and monitor the status of electrical outages. Available channels now include phone, interactive voice response (IVR), email, text/short message service (SMS), the xcelenergy.com website, social media, and most recently, the Xcel mobile application (app).

Xcel further notes that, while the use of electronic communications is continuing to increase, the use of traditional channels, such as the U.S. Mail, is declining.

Xcel is therefore requesting the following operational changes that would require tariff changes:

- Changing the hours of operation of its general customer service line from 24 hours per day, 7 days per week to 7:00am – 7:00pm Monday through Friday and 9:00am to 5:00pm on Saturday;

- Regarding planned outage notification, allowing Xcel to offer phone, email, or text notification, depending on customer choice, rather than requiring U.S. Mail and phone notification prescribed by Minn. Rule 7826.0800;;
- Offering a text option in addition to email for communications associated with the eBill and eBill Payment Terms of Use tariff; and
- Modifying the description of the RDF Rider that is printed on customer bill backs to conform to the changes made to Minnesota Statutes, section 116C.779, subd. 1(j) by the 2017 Minnesota Legislature.

Xcel indicates that the proposed change to planned outage notification requires a variance to Minn. Rule 7826.0800 and an exception to its Customer Notice of Planned Service Interruptions tariff provision in its Electric Rate Book. Xcel requests a 4-year rule variance.

III. DEPARTMENT ANALYSIS

A. PROPOSED CHANGE OF CALL CENTER HOURS OF OPERATION

As noted above, Xcel proposed to change its business hours for general customer service from 24 hours per day, seven days a week, to 7 a.m. through 7 p.m. Monday through Friday, and 9 a.m. through 5 p.m. on Saturdays. Xcel gathered data on its own call types and volumes, as well as through an informal survey of similarly-sized investor-owned utilities (IOUs) to guide the development of this proposal. The Company stated that only 14 percent of other utilities surveyed are operating 24/7 for general customer service, and that the proposed operating hours would capture nearly 90 percent of its current call volume. Xcel made clear that it would continue to staff Customer Service Representatives 24/7 to answer calls for electric or natural gas outages and emergencies.

The Department appreciates the time and research that Xcel put into developing its proposal for reduced general customer service hours. Initially, it seemed as though the reduced availability of customer service representatives could compress and increase call volumes during the new business hours, therefore making it more difficult for Xcel to comply with Minnesota Rule 7826.1200 Call Center Response Time¹ in its annual service quality reports. But the Company stated that it will be increasing staffing in the core general service hours for now, and expect that they will be able to reduce staffing needed to answer phone calls over time.² Xcel also stated that it reviewed the reporting requirements in Minn. Rule 7826.1200, and it

¹ This rule requires utilities to answer 80 percent of calls made to the business office during regular business hours within 20 seconds. Please see Xcel's filings in Docket Nos. E002/M-17-249 and G002/M-17-341 for more detail on this reporting requirement.

² See Petition, page 18.

believes that the Company will continue comply with the requirements after the proposed changes.

The Department recommends that the Commission approve the Call Center schedule change with two years of compliance review in Xcel's annual electric and natural gas service quality reports. The Department requests that, in addition to the information already required in the report, the Company discuss the successes and challenges it is facing in light of the change in operating hours. If call answer times worsen significantly, particularly if they fall below the required standard, Xcel should provide details on how it plans to improve performance.

B. PROPOSED CHANGE OF PLANNED OUTAGES COMMUNICATION TO CUSTOMERS

Xcel stated that in 2015 it developed a customer preference program, where customers can choose how the Company contacts them for various issues, including outages. Since offering customers these options, approximately 500,000 Xcel Energy customers have opted-in, and expressed a preference for phone, email, or text communication regarding outages; approximately 150,000 of these customers are in Minnesota. The Company proposed to extend these customer preferences to communication regarding planned outages. Based on its research, Xcel indicated that it can increase customer satisfaction without sacrificing service. Xcel stated that this move would not be mandatory for all customers, it would merely match previously-selected communication preferences by its customers to planned outage communications. Any customer with no preferences selected would still receive notification of planned outages in accordance with Minn. Rule 7826.0800 Customer Notice of Planned Service Interruptions, which states:

Utilities shall give customers the most effective actual notice possible of any planned service interruption expected to last longer than 20 minutes. For any planned interruption expected to exceed four hours, the utility shall provide, if feasible, mailed notice one week in advance and notice by telephone or door-to-door household visits 12 to 72 hours before the interruption. Planned service interruptions must be scheduled at times to minimize the inconvenience to customers. When planned service interruptions exceeding four hours are canceled, utilities shall notify, if feasible, the customers who received notice that service would be interrupted.

Since Minn. Rule 7826.0800 requires specific types of communication for planned outages that do not include options for electronic notice, Xcel requested a four-year variance.

Minn. Rule 7829.3200 governs the granting of variances and indicates in its Subpart 1 that the Commission shall grant a variance to its rules when it determines that the following requirements are met:

- a. Enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule.
- b. Granting the variance would not adversely affect the public interest.
- c. Granting the variance would not conflict with standards imposed by law.

Xcel explained how it met this criteria on pages 27 and 28 of its filing. Additionally, the Company proposed to include the following information in its electric and natural gas service quality filings:

- Number of customers who opted-in to preferences;
- Of those customers, how many prefer each type of communication;
- The number of customers who change or cancel their preferences and stated reason, if known; and
- Number and nature of complaints with regard to receiving information in the preferred manner.

The Department agrees that it is faster to reach customers by phone, email, and text communication than by U.S. Mail, and that some customers have expressed preference for communication by phone, email, text messages regarding unplanned service interruptions and outages.

The Department also agrees with Xcel that a change in its unplanned outage communications with its customers would require a variance. Based on the data provided by Xcel related to unplanned outage communications with its customers, the Department concludes that the Company's proposed change has merit and meets the requirements for granting a variance. The Department also appreciates Xcel offering relevant compliance reporting items to help the Department, and ultimately the Commission, ensure that service quality does not inadvertently diminish due to this variance.

As an additional note, the Department would like to point out that, to ensure that customers have all information needed to make an informed communication choice, it is advisable for Xcel to refrain from communicating service interruptions to customers by text messages unless customers are clearly notified that their phone companies may impose additional charges for text messages received. Therefore, the Department recommends that the Commission require Xcel to include this caution to customers in the web page through which customers indicate their communication choice, and to include a statement, such as "Customers choosing the text

message option may be subject to text charges imposed by their cell phone service provider” to Section 5 eBill and Notice of Electronic Presentment and Section 19 Notices of the eBill and eBill Payment Terms of Use.

C. PROPOSED CHANGE OF CURRENT EBILL AND EBILL PAYMENT TERMS OF USE CONTAINED IN THE COMPANY’S ELECTRIC AND GAS RATE BOOKS

Xcel proposed minor changes to its eBill and eBill Payment Terms of Use tariff to make a text option available to customers to receive program communications. Customers would have the option to receive texts and would be later able to opt-out if they change their minds. The Company stated that customers will not be able to opt-out of email communications, as some form of program notifications are necessary.

Considering the information that Xcel provided relating to its proposed variance to allow for text messaging in communicating planned outages, the Department concludes that this proposed change is reasonable as well. It will bring customer preferences in alignment across more contacts with the Company, and since texting is a discretionary option, it will not adversely affect the public interest.

D. PROPOSED CHANGE TO RENEWABLE DEVELOPMENT FUND (RDF) RIDER DESCRIPTION CONTAINED IN THE COMPANY’S NATURAL GAS AND ELECTRIC RATE BOOKS

During the 2017 legislative session, Minnesota Legislature revised the language addressing the Renewable Development Fund. Xcel’s bill backer includes a definition of the RDF Fund. The Company proposed the following definitional change:

Renewable Development Fund
Minnesota law requires Xcel Energy to allocate money to support research and development of renewable energy technologies, grid modernization, and other projects that increase system efficiency.

The Department recommends that the Commission approve the proposed changes by the Company to conform to the revised language in Minn. Stat. section 116C.779 Funding for Renewable Development.

VI. SUMMARY OF RECOMMENDATIONS

Based on the review above, the Department recommends that the Commission:

- Approve the requested Call Center non-emergency schedule change contingent upon two years' annual compliance review in the Company's service quality reports, and approve the associated customer bill form and tariff changes;
- Approve the petition for 4-year variance to Minn. R. 7826.0800 to allow communication with customers of planned outages by phone and email for those customers choosing those forms of communication;
- Approve the request to add text messages/SMS to the Company's eBill and eBill payment Terms and Use contingent upon notifying customers that text rates from their phone company may apply; and
- Approve the requested changes to the RDF Rider description contained on customer bills and incorporated in the Company's Natural Gas and Electric Rate Books;

/lt

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Comments**

Docket No. G002/M-17-553

Dated this 11th day of August 2017

/s/Sharon Ferguson

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