

Staff Briefing Papers: Volume 2/3

Meeting Date November 7, 2024

Agenda Item **1

Company Northern States Power Co. d/b/a Xcel Energy
Minnesota Power
Otter Tail Power Co.

Docket No. E-002/M-24-27

In the Matter of Northern States Power Co. d/b/a Xcel Energy – Electric’s 2023 Annual Safety, Reliability, and Service Quality Report.

E-015/M-24-29

In the Matter of Minnesota Power’s 2023 Annual Safety, Reliability, and Service Quality Report.

E-017/M-24-30

In the Matter of Otter Tail Power Co.’s 2023 Annual Safety, Reliability, and Service Quality Report.

Issues 1. Should the Commission accept Minnesota Power, Otter Tail Power and Xcel Energy’s 2023 Annual Safety, Reliability and Service Quality Reports?

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 **Relevant Documents**

Date

24-27 Xcel Energy

Xcel Energy 2023 Annual Report – Part 1 and Attachments C, E, F, & G	April 1, 2024
Xcel Energy 2023 Annual Report Errata	April 30, 2024
Xcel Energy Letter and Stakeholder Presentation	April 29, 2024

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The attached materials are work papers of the Commission Staff. They are intended for use by the Public Utilities Commission and are based upon information already in the record unless noted otherwise.

✓ **Relevant Documents**

	Date
PUC Information Requests Nos. 1 and 2	April 25, 2024
Xcel Energy Responses to Information Requests Nos. 1 and 2	May 17, 2024
Department of Commerce Initial Comments	June 14, 2024
Citizens Utility Board and Energy CENTS Coalition Joint Initial Comments	June 14, 2024
Xcel Energy Reply Comments	June 24, 2024
Citizens Utility Board and Energy CENTS Coalition Joint Reply Comments	June 24, 2024
Grid Equity Commenters Reply Comments	June 24, 2024
Fresh Energy Reply Comments	June 24, 2024

24-29 Minnesota Power

Minnesota Power 2023 Annual Report	April 1, 2024
Department of Commerce Comments	June 28, 2024
Minnesota Power Reply Comments	July 22, 2024
Department of Commerce Reply Comments	August 6, 2024

24-30 Otter Tail Power

Otter Tail Power 2023 Annual Report	April 1, 2024
Department of Commerce Comments	June 14, 2024

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I. Statement of the Issue

1. Should the Commission accept Minnesota Power, Otter Tail Power and Xcel Energy's 2023 Annual Safety, Reliability and Service Quality Reports?

II. Introduction

Minnesota's Electric Investor-Owned Utilities (IOUs) – Minnesota Power (MP), Xcel Energy (Xcel), and Otter Tail Power Company (OTP) (jointly referred to as the Utilities) – submit Safety, Reliability, and Service Quality (SRSQ) reports annually.¹ All three IOUs filed SRSQ reports on April 1, 2024. Standards and reporting requirements are set in Minn. Rules Chapter 7826.²

Volume 1 of the briefing papers will address safety and reliability. This set of the briefing papers, Volume 2, will address utility service quality. Volume 3 will cover Xcel's disparities in shutoffs and reliability. All three volumes will end with an identical set of decision options.

Beyond the service quality reporting outlined in MN Rules 7826.1400 – 7826.2000, Table 1 includes all additional information ordered in past SRSQ dockets, as well as one pilot.

Table 1: Service Quality Reporting Additional Requirements³

Reporting Standard	Order Issue Year	Details
7826.1700 & 7826.2000	2020	Utilities must provide baseline data information on electronic utility-customer interaction: yearly total number of website visits; logins via electronic customer communication platforms; emails or other customer service electronic communications received; and categorization of emails and electronic customer service communications by subject.
	2021	Utilities must continue to provide information on electronic utility-customer interaction.
	2022	Utilities must provide, in 2023, percentage uptime and error rate percentage information in their annual reports for the next three reporting cycles, to build baselines for web-based service metrics.
7826.2000	2021	Xcel Energy must report on DER complaints.
	2022	Xcel must provide length of time to respond to all DER communications.
	2023	Utilities must include customer complaint data from Minnesota Rules 7820.0500. ⁴
	2023	Utilities must report customer complaints using the Inadequate Service categories established with the workgroup.

¹ In Docket No. 24-28, Dakota Electric Association filed a SRSQ report as an informational courtesy. The Commission is not required to make a decision upon its report. The docket has been administratively closed.

² Minn Rules 7826 Electric Utility Standards. (<https://www.revisor.mn.gov/rules/7826/>) The requirements are listed at the beginning of each section.

³ Docket Nos. E-002/M-20-406, E-017/M-20-401, E-015/M-20-404 (2020); E-002/ M-21-237, E-017/ M-21-225, E-015/ M-21-230 (2021); E-015/M-22-163, E-017/M-22-159, E-002/M-22-162 (2022).

⁴ Minn. Rule 7820.0500 Reporting Requirement. (<https://www.revisor.mn.gov/rules/7820.0500/>)

Other	2020	Utilities must file, and Executive Secretary can approve Public Facing Summaries.
	2021	Utilities must file public facing summaries and publish summaries in locations visible to consumers.
	2022	Utilities must place public facing summaries one click from Home Page.
Other	2020	Minnesota Power will provide data on Remote Reconnect Pilot in SRSQ filings. ⁵
Other	2020	Xcel must work with stakeholders on its interactive map.
7826.1400	2022	Xcel must provide data on discreet, unread meters.
Other	2023	Xcel must provide a response to the Commission's Consumer Affairs Office (CAO) and customers contacting the Xcel Energy Advocacy Team regarding new service installations within two business days, as well as report on training of the Xcel Advocacy Team on how to work with CAO on new service installation efforts. ⁶
Other	2010	Xcel must report the volume of field orders that are investigated and remediated.

III. Reporting Standards

In the below section, Staff lays out service quality reporting standards as such:

1. Minn. Rules dictating service quality and their specific reporting standards;
2. A checklist that shows whether the utilities completed each reporting requirement;⁷
3. Relevant highlights regarding each utilities' service quality; and
4. An examination of issues that Staff flagged in the 2022 SRSQ report briefing papers.

B. 7826.1400 Meter Reading Performance

Utilities must report on how many meters were read and provide an explanation as to why meters were not read.⁸ In addition to the below reporting requirements, utilities must, between April – November, read at least 90% of customer meters; between December – March, at least 80% of meters must be read.⁹

⁵ Docket No. 19-766 Order Approving Pilot Program, December 9, 2020, p. 4.

⁶ Docket Nos. 23-73 et al Commission Order, December 5, 2023, Order Point 8, p. 2.

⁷ A check mark (✓) indicates that the required data was included in the utilities' 2023 annual reports.

⁸ Minn. Rule 7826.1400 Meter Reading Performance. (<https://www.revisor.mn.gov/rules/7826.1400/>)

⁹ Minn. Rule 7826.0900 Meter Reading Frequency; Customer Accommodation, Subpart 1. (<https://www.revisor.mn.gov/rules/7826.0900/#rule.7826.0900.1>)

Table 2: Meter Reading Performance

Utility	Meters read by Utility (#/%)	Meters self-read (#/%) ¹⁰	Meters not read for 6-12 and 12+ months	Explanation for meters not read	Meter reading staffing levels
Xcel	✓	✓	✓	✓	✓
MP	✓	✓	✓	✓	✓
OTP	✓	✓	✓	✓	✓

The Department acknowledged Xcel, MP, and OTP’s fulfillment of the requirements of Minnesota Rules and past Commission Order regarding meter reading.¹¹

Xcel

By the end of 2023, approximately 665,000 of Xcel’s 1.3 million customers received an Advanced Meter Infrastructure (AMI) meter (51%). The remainder were still read using Cellnet Automated Meter Reading (AMR) service.¹² Complete AMI rollout is scheduled to be concluded before the end of 2025.¹³

Xcel personnel read an average of 99.8% of the Company’s meters in 2023, which is an increase from 93.9% in 2022. Only 0.0005% of meters were read by customers. The Department stated it “welcomes the improvement in the Company’s meter reading performance in 2023.”¹⁴

The number of meters not read for 6-12 months in 2022 more than tripled compared to previous years. In 2023, it increased farther from 3,512 to 4,620. The previous 4-year average (2019-2022) was 2,246 meters unread for 6-12 months.

The Department was “surprised by these results given that the Company had read a very high percent of its meters in 2023 compared to 2022.” The Department notes that Xcel has referred to supply chain issues as a driver for more meters going unread but that this is also attributable to the retirement of existing meters and the replacement of new meters.

¹⁰ Utilities report unique meters unread, rather than repeated attempts at reading the same meters.

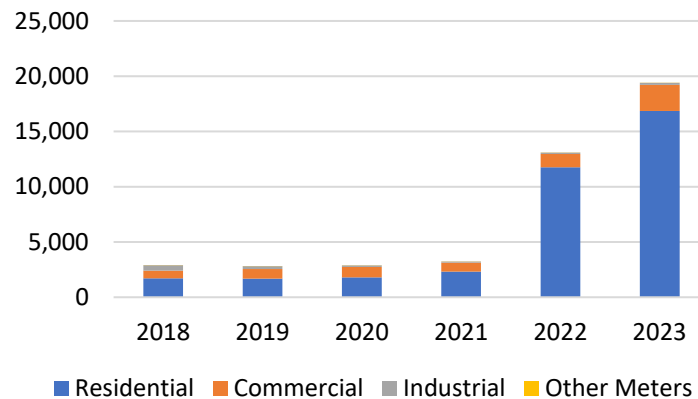
¹¹ 24-27 (Xcel) Department comments, June 14, 2024, pp. 7-10; 24-29 (MP) Department comments, June 14, 2024, pp. 17-19; 24-30 (OTP) Department comments, June 16, 2023, p. 17.

¹² 24-27 (Xcel) report, Section I, April 1, 2024, p. 3.

¹³ 24-27 (Xcel) report, Section I, April 1, 2024, p. 4.

¹⁴ 24-74 (Xcel) Department comments, June 14, 2024, p. 7.

Figure 1: Xcel Meters Not Read for 6-12 Months (2018-2023)¹⁵



4,620 meters were not read for 12+ months in 2023.¹⁶ In 2022, there was an increase in this metric as well. The number of commercial meters not read for over a year increased by 48%. The number of residential meters not read for over a year increased by 236%. Meanwhile, the same metric for industrial meters decreased by 72%.

In 2023, there were nine work orders completed outside the one-day maximum for remediate-upon-referral orders, because they were all logged incorrectly. Xcel says that “necessary communications have been implemented to prevent this type of situation going forward.”¹⁷

Field orders decreased by 17% in 2023. Meanwhile, the average days to complete the orders raised from 3.54 in 2022 to 7.05 in 2023.

The most common reason for not reading meters across customer classes was “No Reading Returned.” These are situations where Xcel is not able to manually read a meter that is not transmitting usage data. Xcel contacts the customer asking them to contact the company, and the customer does not respond.¹⁸

Xcel’s total electric meter malfunctions increased in 2023 as compared to 2022 due to constraints around AMR meter inventory and availability. Xcel’s “supply chain issue required us to refurbish meters from customers that have transitioned to AMI meters.”¹⁹ Xcel expects this issue will be improved once it obtains more AMI meters.

Xcel had 31 meter reading staff by the end of 2023.²⁰ Xcel has moved to a large cross-trained team at its regional work centers throughout the transitional period to AMI. This is an increase

¹⁵ 24-27 (Xcel) report, April 1, 2024, Attachment C.

¹⁶ 24-27 (Xcel) report, April 1, 2024, Attachment C.

¹⁷ 24-27 (Xcel) report, April 1, 2024, p. 6.

¹⁸ 24-27 (Xcel) report, Section I, April 1, 2024, p. 4.

¹⁹ 24-27 (Xcel) report, April 1, 2024, p. 6.

²⁰ 24-27 (Xcel) report, Section I, April 1, 2024, p. 6.

from 2022 of 21 staff.

MP

MP personnel read an average 99.93% of meters in 2023.²¹ In 2023, an average of only 2.08 meters were self-read. MP ended residential customer self-reads in 2023.

These meters will be read by Company personnel as part of the residential AMI opt-out process moving forward.²²

6 meters went unread for 6-12 months. MP did not have any meters that went unread for more than 12 months. Customers with Company-read meters that have not been read for six to twelve months or longer are left reminder notices at the premises and/or are sent reminder letters, phone calls are made to customers to schedule meter readings, and disconnection warnings are issued for unresponsive accounts.

MP’s AMI expansion, which began in 2009, was concluded in 2023.

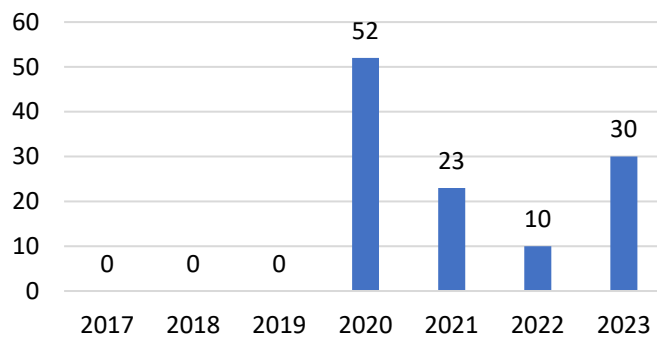
By the end of 2023, MP employed approximately 6 meter reading staff.²³

OTP

OTP read an average of 96.56% meters system-wide in 2023. 2.49% were estimated. 0.95% were self-read by the customer.²⁴

30 meters were not read for 6-12 months in 2023. The Company said that this was due to access issues.²⁵ This was an increase since 2022.

Figure 2: Meters Not Read by OTP for 6-12 Months (2017-2023)²⁶



²¹ 24-29 (MP) report, April 1, 2024, p. 59.

²² 24-29 (MP) report, April 1, 2024, p. 62.

²³ 24-29 (MP) report, April 1, 2024, p. 64.

²⁴ 24-30 (OTP) report, April 1, 2024, Table 19, p. 42.

²⁵ 24-30 (OTP) report, April 1, 2024, Table 19, p. 44.

²⁶ 24-30 (OTP) report, April 1, 2024, p. 44.

One meter was not read for 12+ in 2023.

The Department writes that OTP's meter reading performance has remained consistent.²⁷

OTP maintained 50 meter reading staff throughout 2023.²⁸

C. 7826.1500 Involuntary Disconnections

Minn. Rule 7826.1500 requires reporting on involuntary disconnections, including Cold Weather Rule (CWR) protections.²⁹ Minn. Stat. § 216B.096 requires utilities to provide additional protections to all residential customers between October 1 and April 30.³⁰

On March 25, 2020, the Commission and the Department of Commerce sent a joint letter to all utilities requesting a halt to all service disconnections as a response to the COVID-19 pandemic outbreak while Emergency Order 20-01, issued by Governor Walz, was in place.³¹ In its May 26, 2021 Order in Docket No. 20-375, the Commission allowed a resumption of disconnections on August 2, 2021.³² As a result, for 17 months, utilities were under a disconnection moratorium. Thus, any historical data from 2020-2021 show the effects of the disconnection moratorium. As of 2024, customers are still being impacted by accumulated arrears.

Table 3: Reporting Required by MN Rule 7826.1500

Utility	Customers receiving disconnect notices	Customers seeking and granted CWR protection	Involuntary disconnects and reconnects within 24 hours	Involuntary disconnects restored with a payment plan
Xcel	✓	✓	✓	✓
MP	✓	✓	✓	✓
OTP	✓	✓	✓	✓

The Department acknowledges OTP, MP, and Xcel's fulfillment of the requirements of Minnesota Rules, part 7826.1500.³³

Below Staff discuss each utilities' performance, but Vol. 3 of the briefing papers will discuss Xcel's involuntary disconnections in depth.

²⁷ 24-30 (OTP) Department comments, June 14, 2024, p. 16.

²⁸ 24-30 (OTP) report, April 1, 2024, p. 45.

²⁹ Minn. Rule 7826.1500 Reporting Involuntary Disconnections. (<https://www.revisor.mn.gov/rules/7826.1500/>)

³⁰ Minn. Stat. § 216B.096 Cold Weather Rule; Public Utility. (<https://www.revisor.mn.gov/statutes/cite/216B.096>)

³¹ 20-375 Commission and Department joint letter Re: Responsive Measures to the Outbreak of COVID-19, March 25, 2020.

³² 20-375 Order, May 26, 2021.

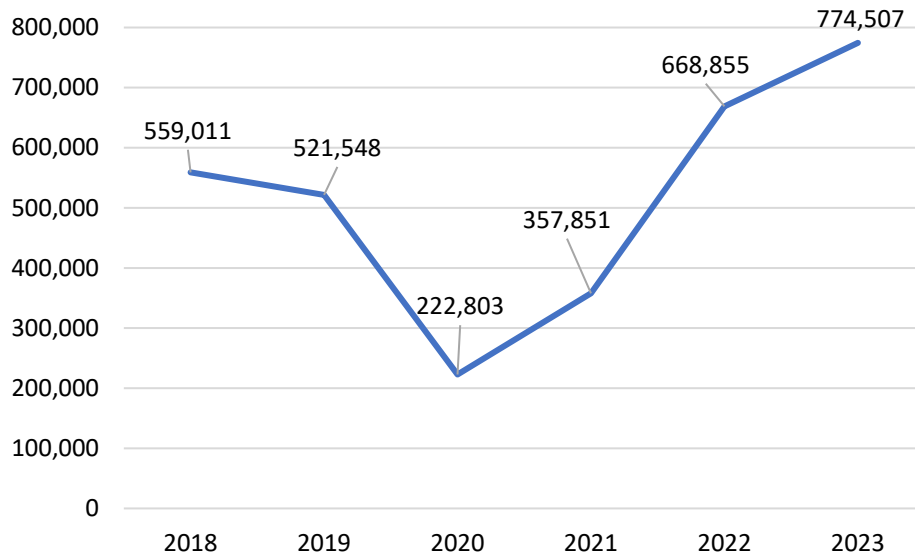
³³ 24-27 (Xcel) Department comments, June 14, 2024, p. 12; 24-29 (MP) Department comments, June 14, 2024, pp. 17-19; 24-30 (OTP) Department comments, June 14, 2024, p. 17.

Xcel

Xcel reports that all four of the involuntary disconnection metrics increased in 2023. Xcel believes that “this is a direct reflection of the current economy, amplified by customers who continue to struggle to pay their bills coming out of the pandemic.”³⁴

In 2023, 774,507 residential customers and 61,575 commercial customers received disconnection notices.³⁵ This is an increase from 2022. Customers receiving disconnection notices in 2023 increased by 86% as compared to the 2020-2022 average. The Department writes that the COVID-19 disconnection moratorium is still affecting the number of disconnection notices sent by Xcel.”³⁶

Figure 3: Disconnection Notices Sent by Xcel (2018-2023)³⁷



In 2023, Xcel involuntarily disconnected 24,722 residential customers. The Department says that in 2023, Xcel’s involuntary disconnections increased by 190% as compared to 2022 and is 320% over the three-year average.³⁸

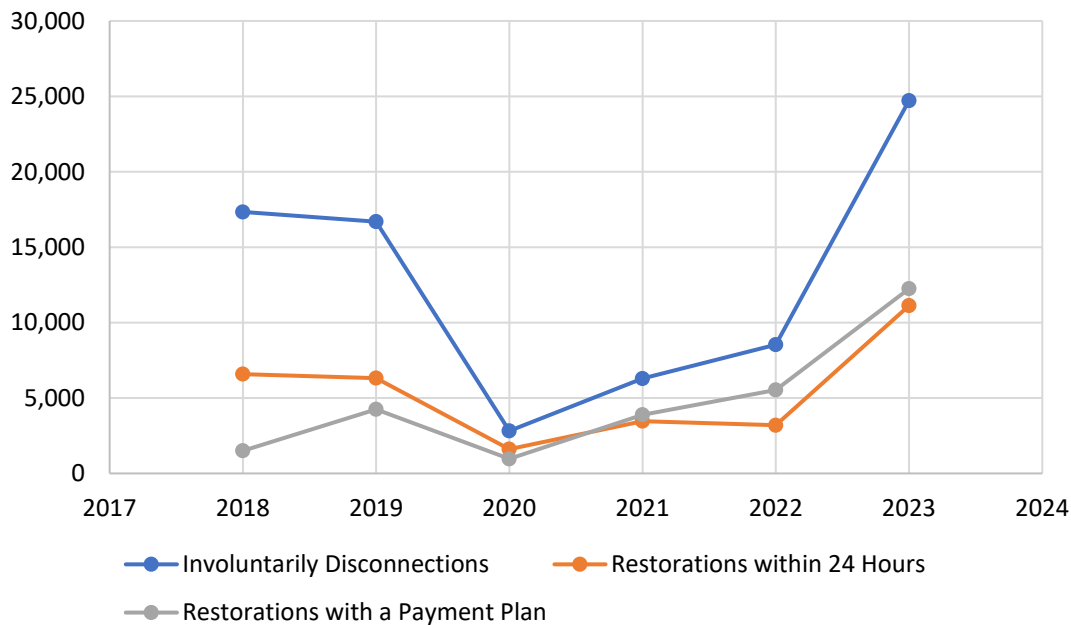
³⁴ 24-27 (Xcel) report, April 1, 2024, p. 8.

³⁵ 24-27 (Xcel) report, April 1, 2024, Attachment E.

³⁶ 24-27 (Xcel) Department comments, June 14, 2024, p. 11.

³⁷ 24-27 (Xcel) Department comments, June 14, 2024, Table 6, p. 12.

³⁸ 24-27 (Xcel) Department comments, June 14, 2024, p. 11.

Figure 4: Xcel Residential Customers Involuntarily Disconnected (2018-2023)³⁹

Xcel states that between January 1 – April 30, 2023, 29% of customers that were eligible for disconnection paid their bill in full. Between May 1 – December 31, 2023, 71% of customers that were eligible for disconnection paid their bill in full.

12,248 were reconnected by entering into a payment plan.⁴⁰ Xcel modified its payment arrangements for as low as 2% down with no restriction on the number of payment arrangements set. Xcel stated that this made more customers rack up larger and larger arrearages. The Company updated its payment plan guidelines so that “customers can receive assistance in avoiding disconnection, while setting up the framework that helps bring their past due balance down in a manageable but meaningful way.”⁴¹

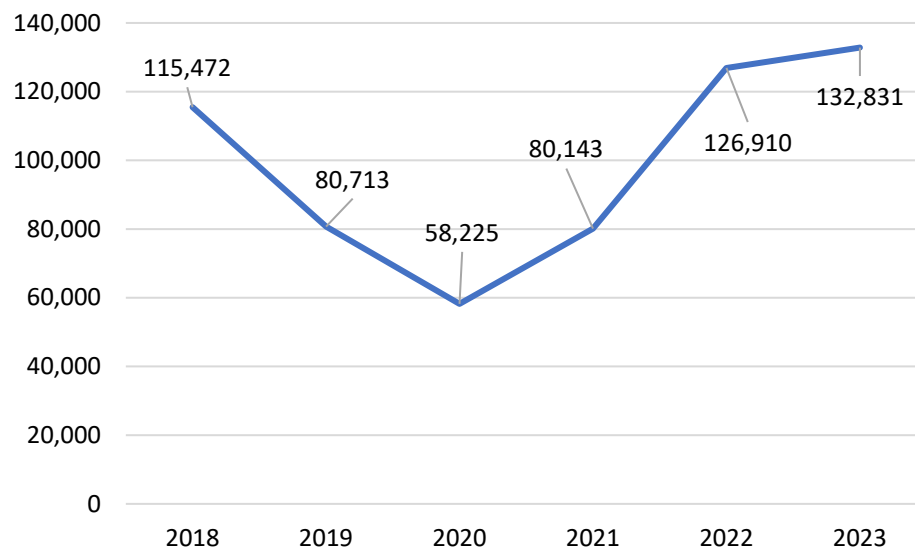
In 2023, 132,831 Xcel residential customers sought CWR protection, and all of them were granted protection.⁴² This was a slight increase as compared to 2022.

³⁹ 24-27 (Xcel) Department comments, June 14, 2024, Table 6, p. 12.

⁴⁰ 24-27 (Xcel) report, April 1, 2024, Attachment E.

⁴¹ 24-27 (Xcel) report, April 1, 2024, p. 8.

⁴² 24-27 (Xcel) report, April 1, 2024, Attachment E.

Figure 5: Xcel Customers Seeking Cold Weather Rule Protection (2018-2023)⁴³

11,126 of those residential customers were reconnected within 24 hours. The number of customers that were restored within 24 hours increased by 248% between 2022 and 2023 and 303% as compared to the three-year average, which Xcel attributed to AMI rollout. Xcel states that AMI technology allows the Company to be disconnected and reconnected than in the past, but remote disconnection can allow customers to reconnect a customer in 15 minutes after making a payment arrangement.

Disconnecting a larger eligible group of customers that may otherwise not have been disconnected before provides the opportunity to interact with them and offer energy assistance options they may be wholly unaware of.⁴⁴

Xcel's PowerOn Program

Under Minn. Stat. § 216B.16, every Minnesota IOU is required to offer a low-income, affordability program. The programs are available to customers that receive energy assistance from the Low-Income Home Energy Assistance Program (LIHEAP). The affordability programs must:

- 1) Lower the percentage of income that participating low-income households devote to energy bills;
- 2) Increase participating customer payments over time by increasing the frequency of payments;
- 3) Decrease or eliminate participating customer arrears;
- 4) Lower the utility costs associated with customer account collection activities; and

⁴³ 24-27 (Xcel) Department comments, June 14, 2024, Table 6, p. 12.

⁴⁴ 24-27 (Xcel) report, April 1, 2024, pp. 8-9.

- 5) Coordinate the program with other available low-income bill payment assistance and conservation resources.⁴⁵

Practically, each program offers to households two components:

- 1) Affordable monthly payments as a percentage of its household income; and
- 2) Past-due bill forgiveness.

Xcel offers its PowerOn program, which is administered by the Energy CENTS Coalition (ECC). Xcel's 2023 annual PowerOn report offered the following stats about the program:⁴⁶

- PowerOn participation has risen steadily since 2022.
- The average program participant had an annual income of \$16,503, and 40.1% of participants fell within 0-75% of the Federal Poverty Level.
- More than \$11 million was distributed to participants.
- The average annual household bill amount was \$1,321, and the average annual program credit was \$505, or approximately 38% of the annual bill.
- Program participants had an average monthly kWh usage of 774 as compared to non-LIHEAP recipients' average usage of 707 kWh usage.

In Xcel's 2022 Gas Affordability Program (GAP)⁴⁷ proceeding, the Commission ordered Xcel to automatically enroll LIHEAP recipients in GAP.⁴⁸ Xcel has chosen to automatically enroll LIHEAP electric customers in PowerOn that also receive natural gas service from the Company. Automatic enrollment began in summer 2023. So far, there has been an increase in PowerOn participation from 35% in 2022 to 41% in 2023.⁴⁹ While there has been an increase, it has not been as dramatic an increase as that of Xcel's GAP. At the end of July 2023 (two weeks after beginning auto-enrollment), Xcel saw an 88% increase in GAP enrollment as compared to the prior month.

⁴⁵ Minn. Stat. § 216B.16, Subd. 15. Low-income affordability programs.

(<https://www.revisor.mn.gov/statutes/cite/216B.16#stat.216B.16.15>)

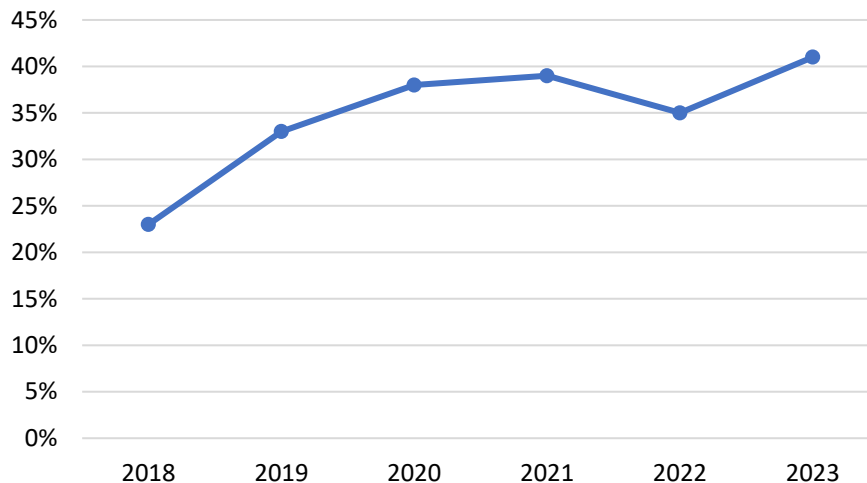
⁴⁶ 04-1956 and 10-854 2023 annual report, December 1, 2023, Attachment B.

⁴⁷ GAP is the natural gas equivalent of the electric low-income affordability programs.

⁴⁸ 22-257 Order, January 18, 2023, Order Points 13-15, p. 3.

⁴⁹ Program participation is measured as the percentage of LIHEAP customers that participate in PowerON.

Figure 6: Percentage of LIHEAP Customers that Participated in PowerOn (2018-2023)



Medical Affordability Program

Xcel operates the Medical Affordability Program (MAP). Xcel customers can participate in MAP if they receive LIHEAP benefits or an income that is less than or equal to 60% of the state median income and are certified by a medical professional that the customer requires electric medical equipment or is currently experiencing a medical emergency. The benefits of MAP mimics PowerON's benefits.

Low-Income Discount

Xcel provides a \$15 monthly discount, the Low-Income Discount (LID), to customers that are LIHEAP-recipients and either disabled or 62 years of age or older.

Xcel's Low Income, Low Usage Program

In Order Point 63 of the Commission's July 17, 2023 Order in the Xcel 2021 Rate Case, the Commission required Xcel to implement the Low Income Low Usage (LILU) program. The Commission approved Xcel's LILU tariff modification in its February 9, 2024 Order.⁵⁰

The LILU is a program for residential customers at or below 50% of the state median income guideline with an annual average monthly usage of 300 kWh or less. The program provides a 35% discount per kWh paid on the following month's bill. Customers with the required income level and usage history will be automatically enrolled in the LILU.

Automatic Bill Credit Program

Xcel established the Equity Stakeholder Advisory Group (ESAG) to address an Order Point in the

⁵⁰ 23-476 February 9, 2024 Commission Order, Order Point 2.

Company's 2020-2034 Integrated Resources Plan (IRP) that directed the Company to conduct a stakeholder group to address disparities that affect communities low-income and Black, Indigenous, and People of Color (BIPOC) individuals. 35 diverse organizations were represented in the ESAG. Based on the ESAG's recommendations, Xcel filed a petition in Docket 24-173 for a pilot program that would offer an average automatic bill credit of \$458 per household to 77 Census Block Groups (CGB) where the electric energy burden is estimated to exceed 4%.⁵¹

Docket 24-173 was heard at the Commission's October 10th, 2024 agenda meeting. The Commission approved Xcel's proposed pilot program with including but limited to the following modifications:

- Continue to work with the ESAG;
- Implement additional screenings to determine eligible CGBs;
- Use poverty rates as a second criteria when determining bill credit eligibility; and
- Requiring multiple compliance reports.

The Order in 24-173 has not been issued as of the filing of these briefing papers.

Late Payment Charge Pilot Program

In its reply comments, Xcel briefly spoke of a pilot project that would forgive late payment charges.

The Company has started a pilot project focused on keeping our customers in the payment plans they set up. This initiative assists customers with past due balances over \$5,000 by removing one late payment charge with each payment made in their payment plan, up to six total.⁵²

CAO consulted with Xcel Energy about the program. Xcel drew a list of 750 customers. The Company made direct calls to the 750 to set up payment plans and look for any other assistance they could direct them to. Each month a customer makes a payment, Xcel will forgive one month's late fee. Of the 750 customers Xcel started with, only 200 remain in the pilot, because the remainder were not able to keep current with the payment plans. Of the approximately 200 customers remaining, Xcel calls them monthly to gauge if their situation has changed and if the plans need to be adjusted. Xcel indicated it is moving toward disconnecting service for customers who dropped out of the program or didn't respond to calls. *Staff notes that the Commission does not need to make a decision on the pilot program.*

⁵¹ 24-173 Xcel petition, April 23, 2024.

⁵² 24-27 (Xcel) Xcel reply comments, June 24, 2024, p. 14.

Table 4: Metrics to be Monitored in Xcel’s 2023 Reports re: Involuntary Disconnections

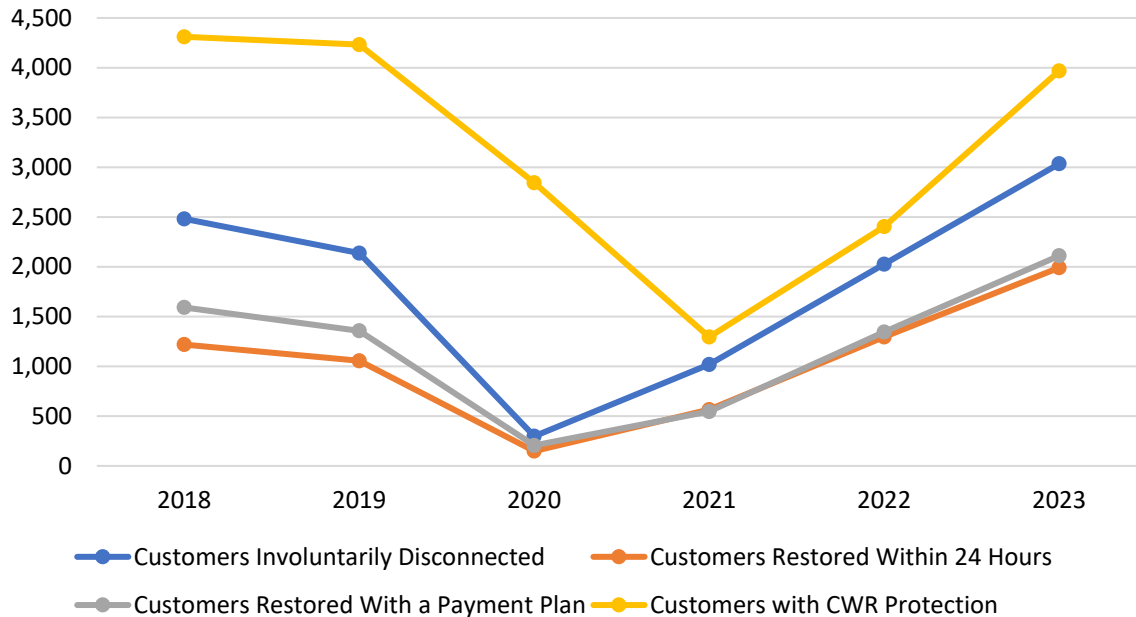
<i>Metrics from the 2022 Report to be Monitored</i>	Results from the 2023 Report
<i>Xcel saw an 87% increase of customers receiving disconnection notices in 2022 as compared to the 2019-2021 average. This may have been attributed to the disconnection moratorium ending.</i>	Customers receiving disconnection notices in 2023 increased by 86% as compared to the 2020-2022. Seeing as the disconnection notices sent in 2023 increased again over 2022. <i>Involuntary disconnections will be discussed in more detail in Vol. 3 of the briefing papers.</i>
<i>Xcel has made the independent decision to auto-enroll LIHEAP customers in PowerOn that have both electric and natural gas service. Staff expected that participation would rise.</i>	PowerOn participation rose since 2022 from 35% to 41% in 2023. Staff will continue to monitor PowerOn participation in the 2024 SRSQ reports.

MP

In 2023, 22,090 disconnections were sent by MP. 20,927 of those were sent to residential customers (94.7% of all disconnection notices). These numbers are in line with 2022’s disconnection notices.⁵³

Involuntary disconnections increased from 2,404 in 2022 to 3,968 in 2023 (a 40% increase).

⁵³ 23-29 (MP) report, April 1, 2024, p. 72.

Figure 7: MP Residential Customers Involuntarily Disconnected (2018-2023)⁵⁴

MP granted CWR protection for every residential customer that requested it, which was 3,968 households in 2023. More customers were granted CWR protection than were involuntarily disconnected.

MP says that while it saw an increase in involuntary disconnections, it also saw an increase in CWR protection granted, payment plans, and approximately a third of residential customers who had been disconnected were restored within 24 hours.⁵⁵

CARE Program

MP's CARE program follows Minn. Stat. § 216B.16, Subd. 15. Below are some facts about the CARE program in 2023:⁵⁶

- CARE had 11,834 active participants at year end 2023. Between 2018 – 2022, participation hovered between 4,000 – 6,000 customers, so there has been a doubled increase in participation in 2023.
- The disconnection rate for CARE participants was 1.23% in 2023. 16.1% of LIHEAP customers that do not participate in CARE were disconnected in 2023.
- The average monthly bill for CARE customers in 2023 was \$60 after the average monthly bill credit of \$24.

⁵⁴ 23-29 (MP) Department comments, April 1, 2024, p. 19.

⁵⁵ 23-29 (MP) report, April 1, 2024, p. 71.

⁵⁶ 11-409 MP 2023 CARE Annual Report, March 1, 2024.

- MP collaborates with local CAP agencies and the Fond du Lac Band of Lake Superior Chippewa to provide education and resources on CARE.

On October 1, 2022, MP allows customers to self-declare that they are low-income and, thereby, qualify for the CARE program. This is likely the reason why participation approximately doubled in 2023.

With this implementation, Minnesota Power became the first utility in the state to allow customers to self-declare their income in order to qualify for, and participate in, the Company's income-qualified programs and an income-and-usage qualified rate discount, an important effort to remove barriers for customers to access needed assistance.⁵⁷

Allowing a customer to self-declare that they are low-income greatly lowers the barrier to participation in affordability programs. On February 20, 2024, the Commission held a planning meeting with CAP agencies, county human services departments, and other community organizations on best practices for eliminating barriers like complex application forms, social stigma, a lack of local partnerships, and little outreach. One long-term solution discussed was allowing for self-attestation of income. Staff believes that income self-declaration is the likely the reason for increased participation.

1. Docket 19-766 – MP's Remote Reconnect Pilot Program

In Docket No. E-015/M-19-766, the Commission approved MP's three-year Remote Reconnect Pilot Program on December 9, 2020.⁵⁸ Participating customers who have been involuntarily disconnected for non-payment may be reconnected remotely after meeting reconnection requirements.

LIHEAP and self-declare customers were reconnected faster overall and under both metrics, with the average time to reconnect under one minute for pilot participants from the point of request.⁵⁹

Participants must have a remote-capable meter which will be installed at no charge. MP also waives the typical reconnection fee (\$20 during business hours and \$100 outside of business hours) for Remote Reconnect participants.

Again, allowing Remote Reconnect Pilot Program customers to self-declare their income encourages participation.

The Commission requires additional reporting in MP's annual SRSQ report. In 2023, MP reported the following metrics regarding its Remote Reconnect pilot participants as part of the

⁵⁷ 11-409 MP 2023 CARE Annual Report, March 1, 2024, p. 12.

⁵⁸ 19-766 December 9, 2020 Order Approving Pilot Program.

(<https://efiling.web.commerce.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={B0544876-0000-CD14-AB56-DAF89733679D}&documentTitle=202012-168890-01>)

⁵⁹ 24-29 (MP) report, April 1, 2024, p. 78.

Order approving the Remote Reconnect Pilot Program:

Table 5: Remote Reconnect Pilot Reporting (2023)⁶⁰

Reporting Metric	2021	2022	2023
Number of participating customers	3,731	4,437	10,178
Approximate number of customers participating in LIHEAP per month	8,100	8,876	9,518
Number of participants that self-declared as low-income	N/A	N/A	564
Number of participants receiving LIHEAP	904	823	2,027
Customers that have opted out of the Pilot	15	24	42
Estimated annual cost savings from the Pilot	-\$464,000	-\$48,000	-\$652,000

In 2022, 706 remote-capable meters were installed. This is less than the number of meters installed in 2021 due to meter supply and workforce eligibility to perform the installation.

In 2023, MP installed 5,741 remote-capable meters, which was the primary cost increase between 2022 and 2023. The \$652,000 is “an expenditure increase based on the incremental installed cost of the remote-capable meters less estimated cost-savings from remote reconnections.”⁶¹ MP estimates that the program’s net costs will be \$185,000 and that 2,000 remote-capable meters will be installed.

In its report, MP includes the average reconnection time for remote vs. standard meters. The Department analyzed the reconnection times, stating:

Reconnection times for standard process customers have doubled from 2021 to 2023 while remote reconnect customers’ reconnection times have fluctuated more narrowly.⁶²

The average time to reconnect a standard meter is approximately nine hours, forty-five minutes. The average time to reconnect a remote-capable meter is approximately six and a half minutes.

The Department requested that MP include the average time to reconnect using the Remote Reconnect Pilot compared to the standard reconnection process in future SRSQ reports.⁶³

On September 23, 2023, MP requested to extend its Remote Reconnect Pilot by two years. In

⁶⁰ 24-29 (MP) Department comments, June 14, 2024, Table 17, p. 29.

⁶¹ 24-29 (MP) report, April 1, 2024, p. 78.

⁶² 24-29 (MP) Department comments, June 14, 2024, p. 30.

⁶³ 24-39 (MP) DOC comments, June 14, 2024, p. 30.

the Department’s December 11, 2023 comments, it did not support extending the program by two years based on the fact that it is not cost-effective. The Department requested that MP provide a cost/benefit analysis. If the analysis shows net cost savings at 20 years, the Department supports extending the Reconnect Pilot by two years.⁶⁴ Staff met with MP in September 2024 and stated that it would be filing a cost-benefit analysis shortly.

In MP’s October 22, 2024 filing, the Company provided a cost-benefit analysis of the six assumptions used in the Pilot:

- 1) Labor/Vehicle costs
- 2) Staff costs
- 3) Remote-capable meter population goal
- 4) Average historical reconnections
- 5) Failure rate
- 6) Incremental installed meter cost⁶⁵

The only assumption that will be updated is the Labor/Vehicle costs. The below table shows the original assumed costs compared to the updated 2024 costs.

Table 6: Original and 2024 Labor/Vehicle Costs for MP’s Remote Reconnect Pilot Program

	Regular Business Hours	After Business Costs
Original Cost Assumptions	\$55-80 Average \$67.50	\$120-180 Average \$150
Updated 2024 Costs	\$60-90 Average \$75	\$140-210 Average \$175

MP explained that:

The primary driver of this uptick in costs in 2024 is contract wage increases.⁶⁶

The updated assumption will be used in future SRSQ reports.

Table 7: Metrics to be Monitored in MP’s 2023 Report re: Involuntary Disconnections

<i>Metric from the 2022 Report to be Monitored</i>	<i>Result from the 2023 Report</i>
<i>MP has said that its Remote Reconnect Pilot will begin to realize the benefits in regard to a decrease in involuntary disconnections of the Pilot program in coming years due to</i>	A greater number of customers were disconnected in 2023 than in 2022. In turn, the number of customers reconnected within 24 hours increased in 2023, which may be

⁶⁴ 19-766 DOC comments, December 12, 2023, p. 2.

⁶⁵ 19-766 MP compliance filing, October 22, 2024, p. 1.

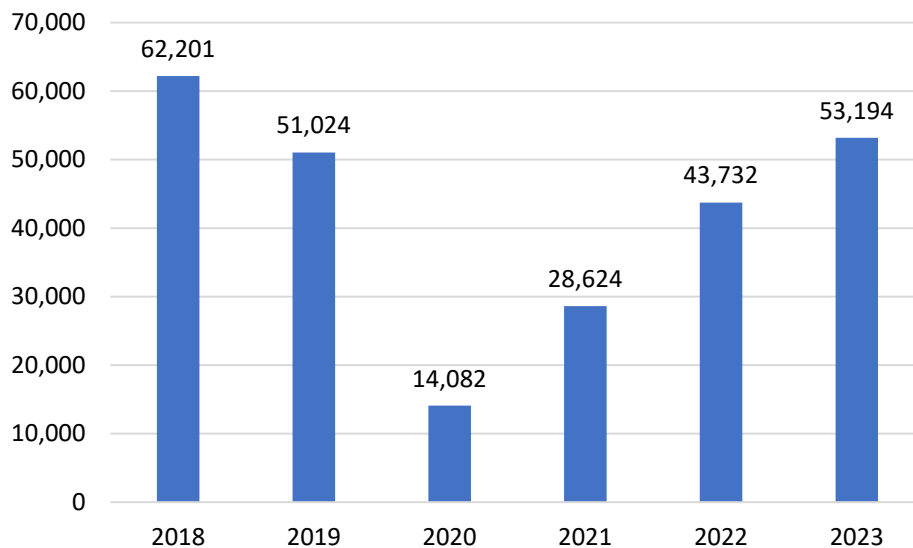
⁶⁶ 19-766 MP compliance filing, October 22, 2024, p. 2.

<i>delays in COVID-19.</i>	attributed to the Remote Reconnect Pilot. Staff will continue monitoring the benefits of the Pilot.
<i>MP will be using the updated 2024 assumed costs of Labor/Vehicle costs in its future SRSQ reports.</i>	Staff will monitor Labor/Vehicle costs going forward.

OTP

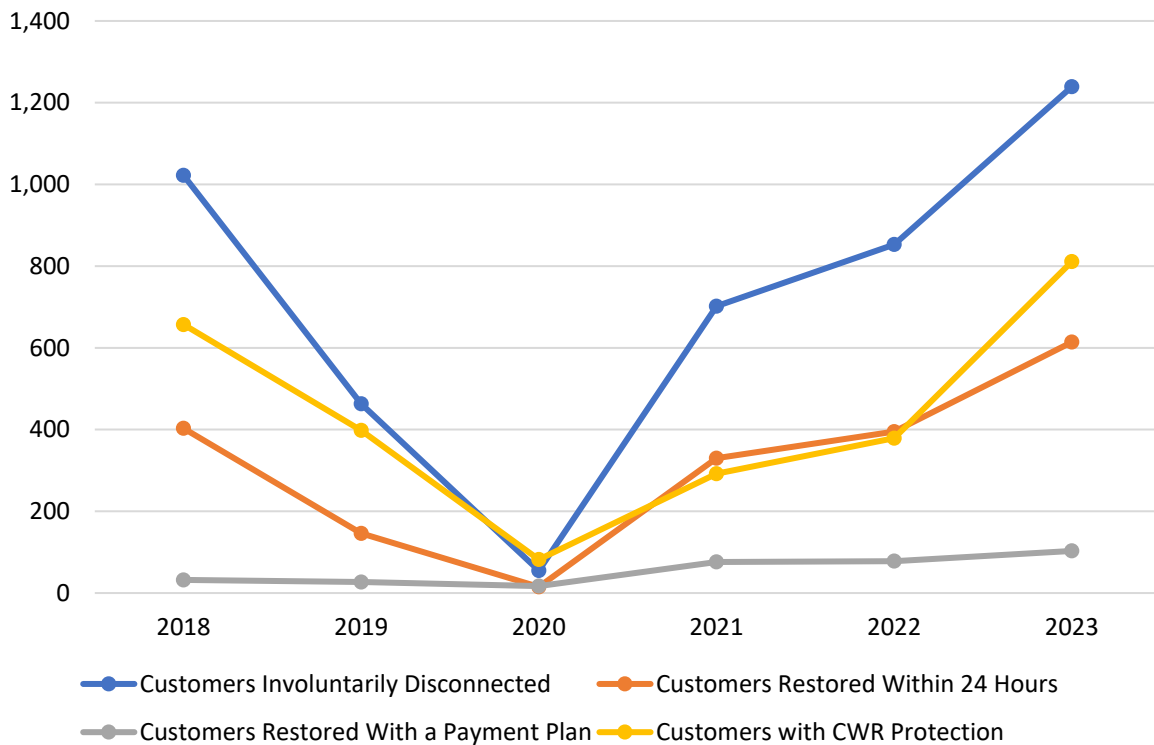
In 2023, OTP sent 57,690 disconnection notices. 53,194 (92%) were sent to residential customers. The number of disconnection notices sent in 2023 have returned to the level of notices sent pre-pandemic.

Figure 8: Disconnection Notices Sent by OTP (2018-2023)⁶⁷



103 residential customers and one small commercial customer was restored to service by entering into a payment plan in 2023, which was an increase since 2022.

⁶⁷ 24-30 (OTP) DOC comments, June 14, 2023, Table 9, p. 17.

Figure 9: OTP Customers Involuntarily Disconnected (2018-2023)⁶⁸

911 OTP customers sought that CWR protection, and 811 customers were granted CWR protection (89%). OTP said that customers chose an alternative payment arrangement or obtained payment assistance.⁶⁹

In 2023, OTP involuntarily disconnected 1,239 residential customers. This is the highest number of disconnections since 2014 (1,413).

The Department requested that the Commission require Otter Tail Power to report annual totals by customer class on the number of customers whose service was disconnected involuntarily and the number of customers whose service was restored within 24 hours in future SRSQ reports.

OTP's Uplift Program

On March 18, 2022, OTP filed a petition with the Commission proposing a low-income affordability program. In the Commission's August 8, 2022 Order, OTP's Uplift Program was approved.⁷⁰

OTP's Uplift Program is also mandated by Minn. Stat. § 216B.16, Subd. 15. Customers that have

⁶⁸ Docket No. E-017/M-23-76 (MP) DOC comments, June 14, 2023, Table 10, p. 18.

⁶⁹ 24-30 (OTP) report, April 1, 2024, p. 50.

⁷⁰ 22-133 Commission Order, August 8, 2022.

been approved for the Uplift Program receive credit based on their kWh usage at their service location for the 12 months prior to application approval.

Table 8: OTP's Uplift Program Monthly Bill Credits Based on Annual Usage⁷¹

Annual Usage	Monthly Credit
Equal to or greater than 12,000 kWh annually	\$40
7,500 – 12,000 kWh annually	\$25
Less than 7,500 kWh annually	\$15

Order Point 3 of the Commission's August 8, 2022 Order requires OTP to file an annual report beginning 90 days after the first completed program year, including information like participant counts, average bills and bill credits, disconnection, and reconnection information. Below are some facts about the Uplift program in 2023:⁷²

- The Uplift Program had 1,315 active customers as of September 30, 2023.
- Otter Tail has seen a steady increase in Uplift Program applications.
- Participants in the Uplift Program have demonstrated a 50 percent decrease in late payments.

Table 9: Metrics to be Monitored in OTP's 2023 Report re: Involuntary Disconnections

<i>Metrics from the 2022 Report to be Monitored</i>	<i>Results from the 2023 Report</i>
<i>OTP said that 379 customers were granted CWR status out of 444 requests, explaining that the remaining 65 had chosen other payment plans. Staff would like more information about all of OTP's payment plan options.</i>	In its 2023 SRSQ report, OTP did not report on its other payment arrangement options for customers. Staff asks for OTP to share how customer service representatives create payment arrangements, including any other standard payment arrangements it offers to customers outside of the CWR payment plans, in its 2024 SRSQ report.
<i>Less than 10% of OTP's restorations were done through a payment arrangement with the customer, which is a decrease from 2021.</i>	In 2023, less than 8% of OTP's restorations after a shutoff were done by entering into a payment plan. This is a further decrease from 2022. Staff will continue to monitor whether OTP is offering more payment plans in its 2024 SRSQ report.
<i>OTP reported on the activities of its Uplift Program 90 days after its first full year.</i>	The Uplift Program has had an increase in applications, and participants have decreased their late payments. Staff will continue to look for more benefits of the program in the 2024 SRSQ report.

⁷¹ MP Rate Book 13.07, Electric Rate Schedule, Uplift Program Rider, p. 3 of 3.
(https://www.otpco.com/media/owsjl03d/mn_1307.pdf)

⁷² 23-530 OTP Uplift Program Annual Update, December 29, 2023.

D. 7826.1600 Service Extension Request Response Times

Table 10: Reporting Required by MN Rule 7826.1600

Utility	Requests to locations <u>NOT</u> previously served and time until ready for service (#)	Requests to locations previously served and time until ready for service (#)
Xcel	✓	✓
MP	✓	✓
OTP	✓	✓

The Department acknowledged that OTP, MP, and Xcel fulfilled the requirements of Minnesota Rules 7826.1600.⁷³

Xcel

Previously Served Locations

In 2023, Xcel served 211,630 customers at locations that were previously served with requests handled on the next business day.⁷⁴

Locations Not Previously Served

In 2023, Xcel extended new service to 8,256 residential customers and 925 commercial customers. On average, it took 23.2 days to connect a new residential service and 18.8 days to connect a new commercial service. Xcel explained that long lead times for electrical materials has contributed to the increase in service extension timelines.⁷⁵

⁷³ 24-27 (Xcel) DOC comments, June 14, 2024, p. 14; 24-29 (MP) DOC comments, June 14, 2024, p. 20; 24-30 (OTP) DOC comments, June 14, 2024, p. 18.

⁷⁴ 24-27 (Xcel) report, April 1, 2024, p. 10.

⁷⁵ 24-27 (Xcel) report, April 1, 2024, pp. 9-10.

Figure 10: Xcel’s Residential Service Extensions

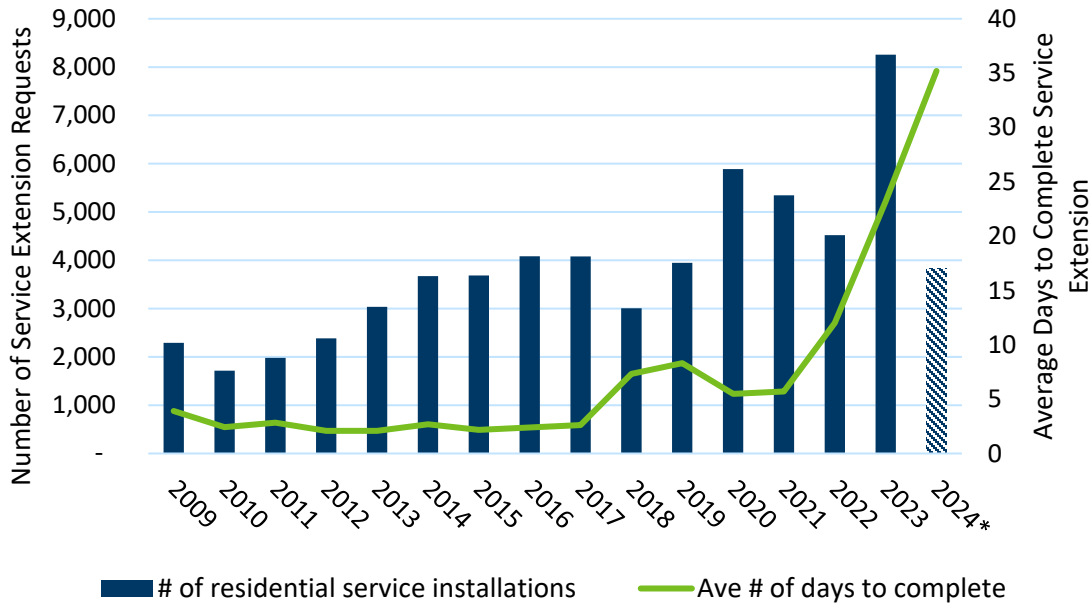
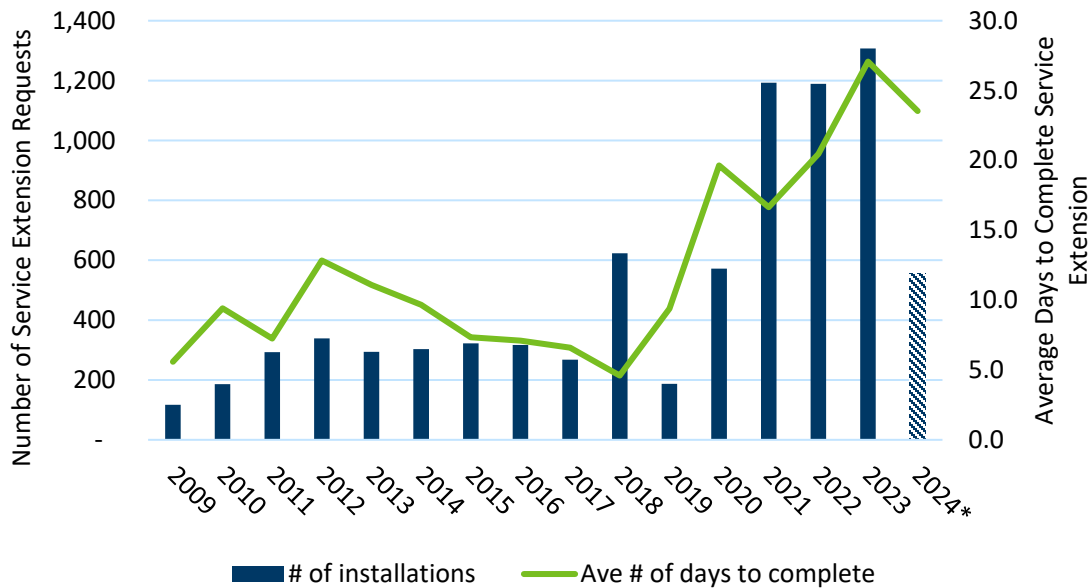


Figure 11: Xcel’s Commercial Service Extensions



*through July 2024

Table 11: Metric to be Monitored in Xcel’s 2023 Report re: Service Extension Requests

Metric from the 2022 Report to be Monitored	Result from the 2023 Report
<i>Xcel is experiencing delays in service extensions due to supply chain constraints.</i>	In its 2023 SRSQ report, Xcel continues to say that long lead times for electrical materials

<p><i>Staff will be monitoring Xcel's supply chain constraints and how that affects higher service extension response times for both residential and commercial customers.</i></p>	<p>has contributed to the increase in service extension timelines. In the 2024 SRSQ report, Staff will monitor whether lead times for materials shorten, and therefore, whether service extension timelines reduce.</p>
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MP

Previously Served Locations

In 2023, MP served 402 residential customers at locations that were previously served; five of those locations did not meet the goal date. Of the five, four were due to the customer not being ready for service.⁷⁶ There were 26 commercial customers who requested service at a location that was previously served.

Locations Not Previously Served

In 2023, MP extended new service to 590 residential customers and 150 commercial customers.⁷⁷ 80% of new service extensions met the service dates requested by the customer. Of the 20% of service extensions that were not met in a timely manner, the following reasons were given:

- Customer’s contractor or electricians not ready due to an increased workload for contractors/electricians or material shortages on the customer side for job completion (9.21%)
- Customer not ready due to needing to hire an electric, construction delays, etc. (4.87%)
- Customer late notification beyond the 21-day planned schedule (1.97%)
- MP unable to meet the date due to unplanned work, needing planned power outages, resources, and not being able to meet the date desired by the customer (1.97%)⁷⁸

Table 12: MP Service Extension Times for Locations Not Previously Served (2019-2023)⁷⁹

Customer Class	Year	Requests (#)	On date requested
Residential	2019	787	43%
	2020	929	54%
	2021	1050	81%
	2022	816	78%
	2023	590	83%

⁷⁶ 24-29 (MP) report, April 1, pp. 84-85.

⁷⁷ 24-29 (MP) report, April 1, 2024, p. 80.

⁷⁸ 24-29 (MP) report, April 1, 2024, p. 82.

⁷⁹ 24-29 (MP) DOC comments, June 14, 2024, Table 10, p. 20. Results rounded up to the nearest whole percent.

Commercial	2019	723	25%
	2020	711	54%
	2021	382	79%
	2022	116	63%
	2023	150	71%

OTP*Previously Served Locations*

OTP extended service to 1,272 residences that had been previously served. 1,126 of those installations were completed within 0-2 days (89%). 119 of the total 135 small commercial installations were also completed within 0-2 days (88%).⁸⁰

Locations Not Previously Served

In 2023, OTP extended service to 295 residential locations that it had not previously served, which is a 28% decrease since 2022. Of those, the majority installed service within 3-10 days.

Table 13: Installation Days for Customers Not Previously Served (2023)⁸¹

Installation Timelines	Residential (#)	Small Commercial (#)
0-2 days	96	55
3-10 days	109	29
11-20 days	35	8
21+ days	55	18
Total	295	110

Fewer OTP customers were asking for new service installations, but the number of days needed to complete service to locations went up.

Table 14: OTP New Service Extensions (2019-2023)⁸²

Year	Residential and Commercial Requests (#)	1-10 days later
2019	261	56%
2020	536	65%
2021	462	51%
2022	530	21%
2023	421	37%

⁸⁰ 24-29 (MP) report, April 1, 2024, Table 32, p. 56.

⁸¹ 24-30 (OTP) report, April 1, 2024, pp. 52-53.

⁸² 24-30 (OTP) Department comments, June 14, 2024, p. 18.

Table 15: Metric to be Monitored in OTP's 2023 Report re: Service Extension Requests

<i>Metric from the 2022 Report to be Monitored</i>	Result from the 2023 Report
<i>Across 2019-2021, 30% of OTP's service extensions were completed between 1-10 days. It lowered to 10% in 2022.</i>	Table 14 demonstrates that OTP completed more new service requests within 1-10 days as compared to 2022, but 2023's metric is still not as high as 2019-2021.

E. 7826.1700 Call Center Response Times

Minnesota Rules set a utility performance standard in which annually, 80% of calls made during business hours must be answered within 20 seconds. Calls made regarding service interruptions may be "answered" by connecting the customer to a recording that provides specified information. For calls to the business office using an automated call processing-system, like interactive voice response (IVR), the 20 second countdown clock begins when the customer has selected a menu option to speak to a live operator or representative.⁸³

Table 16: Reporting Required by MN Rule 7826.1200

Utility	Calls to business office, month-by-month breakdown (#)	Calls regarding service interruptions, month-by-month breakdown (#)	Total calls offered to agents and answered within 20 seconds (#)
Xcel	✓	✓	✓
MP	✓	✓	✓
OTP	✓	✓	✓

The Department acknowledged that Xcel, MP, and OTP fulfilled the requirements of Minnesota Rules 7826.1200.⁸⁴

Xcel

In 2023, an average of 83.4% of calls were answered within 20 seconds. Xcel utilizes the following call types to answer customers:

- Residential call center representatives
- Business Solutions Center (BSC)
- Credit and Personal Account Representatives (PAR)
- Interactive Voice Response (IVR)

⁸³ Minn. Rules 7826.1200 Call Center Response Time, Subparts 1 and 2.

(<https://www.revisor.mn.gov/rules/7826.1200/>)

⁸⁴ 24-27 (Xcel) DOC comments, June 14, 2023, p. 15; 24-29 (MP) DOC comments, June 14, 2023, p. 21; 24-30 DOC, June 14, 2023, p. 18.

Table 17: Xcel Customer Calls Answered in 20 Seconds or Less by Method⁸⁵

Method	Calls Answered in 20 Seconds or Less
Residential call center representatives	57%
BSC	61%
Credit Department	79%
PAR Department	45%
IVR	100%
Average	83%

Xcel assumes all IVR calls are completed within 20 seconds. Calls answered by agents are answered less quickly. For calls answered by customer service agents, 61.8% were answered within 20 seconds or less. Staff notes that over the last four years, calls answered by agents fall 42 percentage points behind the 20 second standard on average.

In Staff's opinion, speaking with a live agent is the most useful to a customer, especially when setting up a payment plan, because the agent is able to be more flexible when setting payment arrangement as compared to IVR and give more information about additional resources that the customer could utilize.

Table 18: Xcel Calls Answered within 20 Seconds by Agents (2020-2023)⁸⁶

Year	Answered within 20 Seconds (%)
2020	59%
2021	51%
2022	59%
2023	62%

PUC IR No. 1

The PUC issued IR No. 1 to Xcel asking in which state its customer service teams are located and whether they are trained on Minnesota Statutes, Rules, policies, and procedures.⁸⁷ Xcel responded that its CSRs are located in Minnesota, Wisconsin, and Texas. All new CSRs participate in an eight-week training course, which consists of a combination of lectures, role play, independent learning, and job shadowing. The course covers information on state-specific information. CSRs also have access to a knowledge tool that they can use as a reference resource.⁸⁸

⁸⁵ 24-27 (Xcel) Department comments, June 14, 2024, Table 8, p. 15. *Percentages rounded to the nearest whole number.*

⁸⁶ 23-27 (Xcel) report, April 1, 2024, Attachment F, p. 2 of 2. *Percentages rounded to the nearest whole number.*

⁸⁷ 24-27 (Xcel) PUC IR No. 1, April 26, 2024.

⁸⁸ 24-27 (Xcel) PUC IR No. 1 response, May 17, 2024.

PUC IR No. 2

PUC IR No. 2 asked about Xcel’s customer service protocols, standards, and practices in place surrounding high call volumes and outage events.⁸⁹ Xcel responded that its Workforce Management Department monitors call volume 24/7. Electric outage and gas emergency calls are considered top priority. If the Company is experiencing high call volume due to an outage event, an on-call rotation is utilized, and all call center trained employees are instructed to stop other work and assist customers.⁹⁰

MP

In 2023, MP met the 20 second standard in MN Rules 7829.1200. 80% of its calls were answered during business hours within 20 seconds. At the time of this filing, MP’s response time is approximately 85% in 2024.⁹¹

This is a vast improvement over the last two years: 45% in 2022 and 50% in 2021.

Table 19: Call Center Response Times by Month (2023)⁹²

Month	Calls that were Answered within 20 Seconds (%)
<i>January</i>	78%
<i>February</i>	88%
<i>March</i>	79%
<i>April</i>	70%
<i>May</i>	69%
<i>June</i>	79%
<i>July</i>	77%
<i>August</i>	87%
<i>September</i>	85%
<i>October</i>	79%
<i>November</i>	87%
<i>December</i>	89%

MP explains that during April and May, two experienced full-time Call Center representatives advanced to other positions at the Company. While the positions were being filled, less experienced representatives were handing calls. Also, May typically has a higher call volume being that it is the end of CWR season, the beginning of MP’s summer collection process, and there are increased calls for starting and stopping service as college students are moving.

⁸⁹ 24-27 (Xcel) PUC IR No. 2, April 26, 2024.

⁹⁰ 24-27 (Xcel) PUC IR No. 2 response, May 17, 2024.

⁹¹ 24-29 (MP) report, April 1, 2024, p. 88.

⁹² 23-29 (MP) report, April 1, 2024, p. 87.

The majority of calls were about billing inquiries, followed by start/stop service requests.⁹³

Table 20: Metric to be Monitored in MP's 2023 Report re: Call Center Response Times

<i>Metric from the 2022 Report to be Monitored</i>	Result from the 2023 Report
<i>MP's call response time (45%) was far below the performance target in Minn. Rule (80%).</i>	MP met the 80% standard in 2023, which is a vast improvement over the Company's 2022 results.

OTP

OTP's call center response time in 2023 was approximately 77%, falling short of the 80% target. This is a drop from 2022's response time of 89%. OTP explains that it experienced turnover in the customer service representative role, hiring nine new CSRs. Therefore, the number of calls taken is lower, and the time taken per call is higher.⁹⁴

The Department says that January was the lowest performance month (63%), and November was the highest performance month (92%).⁹⁵

F. 7826.1800 Emergency Medical Account Status (EMS)

Table 21: Reporting Required by MN Rule 7826.1800

Utility	Customers requesting EMS (#)	Customers granted EMS (#)	EMS denials and explanation (#)
Xcel	✓	✓	✓
MP	✓	✓	✓
OTP	✓	✓	✓

The Department acknowledged Xcel, MP, and OTP's fulfillment of the requirements of Minnesota Rules, part 7826.1800.⁹⁶

Xcel

As of January 2024, 2,614 households had requested EMS status. 2,193 were certified; 421 were denied. Approximately 16% of Xcel's customers that requested EMS status were not granted it.⁹⁷

In 2023, as compared to the previous four years, more Xcel customers requested EMS status, but less were granted it. Despite the denials, the Department said that the number of

⁹³ 24-29 (MP) report, April 1, 2024, p. 89.

⁹⁴ 24-30 (OTP) report, April 1, 2024, p. 60.

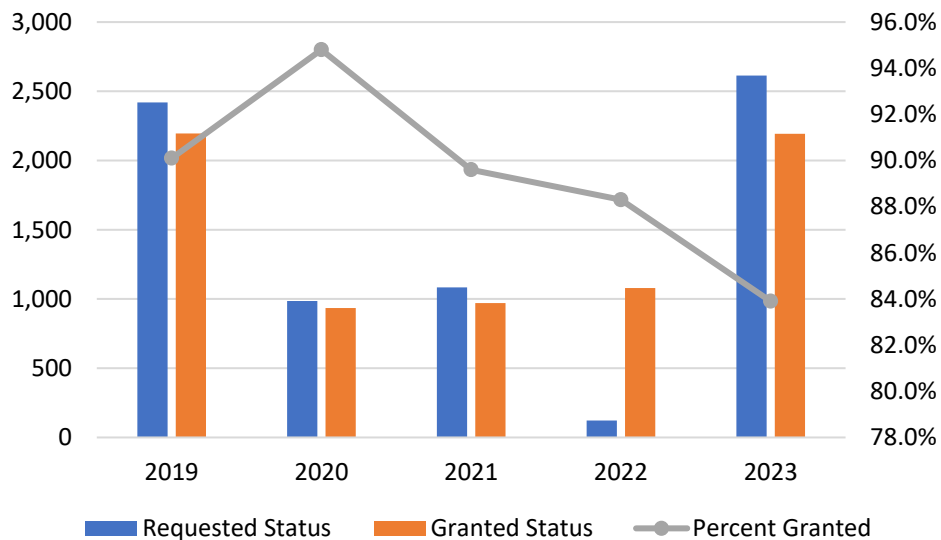
⁹⁵ 24-30 (OTP) Department comments, June 14, 2024, p. 19.

⁹⁶ 24-27 (Xcel) Department comments, June 14, 2024, p. 17; 24-29 (MP) Department comments, June 14, 2024, p. 21; 24-30 (OTP) Department comments, June 14, 2024, p. 20.

⁹⁷ 24-27 (Xcel) Department comments, June 14, 2024, p. 16.

customers requesting status and the number approved were both 100% higher than the same figures in 2022.

Figure 12: EMS Status Requested vs. Granted (2019-2023)⁹⁸



Xcel sent 1.2 million outreach items in 2023 about its affordability offerings, including MAP.⁹⁹ Xcel has also contacted the Minnesota Medical Association to educate medical professionals on Xcel’s EMS and MAP.

Table 22: Metric to be Monitored in Xcel’s 2023 Report re: EMS

<i>Metric from the 2022 Report to be Monitored</i>	<i>Result from the 2023 Report</i>
<i>In 2022, 10% of Xcel’s EMS applicants were denied. Staff was interested in why these customers were denied and what Xcel is doing about it, i.e., whether Xcel reaches back out to customers who did not return the form and encourage them to do so.</i>	Xcel was ordered to make changes to its EMS in Docket 22-233, as described in the next section.

1. Docket 22-233 – Xcel’s Emergency Medical Account Procedures

The Commission’s Order in Docket No. 22-233 required Xcel to revise its Emergency Medical Account procedures.¹⁰⁰ Xcel filed a compliance report on April 20, 2023 stating that it had:

- Revised the Medically Necessary Equipment & Emergency Certification Form to include nurse practitioners and physician assistants among the medical personnel who can

⁹⁸ 24-27 (Xcel) Department comments, June 14, 2024, Table 9, p. 16.

⁹⁹ 24-27 (Xcel) report, April 1, 2024, p. 13.

¹⁰⁰ 22-233 Commission ORDER APPROVING PETITION AS MODIFIED AND REQUIRING FILINGS, March 22, 2023, Order Points 4 and 5.

provide written certification;

- Removed the Medical Verification check boxes from the form and replaced them with broad language that recognizes that cognitive impairments may qualify as a medical emergency;
- Added an email address to the form to allow qualified medical professionals to email a completed and scanned form to the PAR team;
- Provided 30 calendar days for a customer to obtain written certification;
- Met with stakeholders to present information about EMS;
- Added information about EMS to its annual bill insert; and
- Sends additional information about its EMS to all customers once each year.¹⁰¹

The Department stated that Xcel complied with the reporting requirements in Commission Order (**Decision Option 8**).¹⁰²

Currently, Xcel’s website doesn’t allow a “direct submit” button for the form as required by Order Point 5(h). In reply comments, Xcel stated that it would add the direct submit option by Q4 2024. Implementing a “direct submit” option is a one-time cost of approximately \$50,000 for the Company. The Department had no additional comments on the estimated cost of adding a “direct submit” button.¹⁰³

After the Joint Commenters provided an example of an Xcel customer with a medical issue who was disconnected and then hospitalized, Xcel added two additional protections. The new process is as follows:

1. After directly submitting the form on Xcel’s website, it will be sent to the PAR team.
2. A PAR representative will contact the customer directly to help finalize the medical form and resolve any open information that would leave the application in “incomplete” status, which halts benefits.

Xcel stated that “the new process provides a more customer service focused experience, especially for those who are unable to drive or have disabilities that may hinder their ability to complete the process under its current steps.”¹⁰⁴

MP

In 2023, 98 customers requested emergency medical account status. None of them were denied. With renewals, there were 182 customers in total with EMS. Of these, 51 were

¹⁰¹ 22-233 compliance report, April 20, 2023, pp. 2-3.

¹⁰² 24-27 (Xcel) Department comments, June 14, 2024, p. 2.

¹⁰³ 24-27 (Xcel) Department supplemental comments, October 14, 2024, p. 2.

¹⁰⁴ 24-27 (Xcel) Xcel reply comments, June 24, 2024, p. 11.

removed. The reasons for removal were “non-renewal, customer request, deceased customer, or closed account.”¹⁰⁵

After a customer identifies that they have a medical need, they are advised to have their physician or medical supply company send a letter via mail or fax to the Company within 30 days. To Staff’s knowledge, MP is the only company that will accept a letter from a medical supply company.

When a renewal is required, the customer service team calls the customer directly 30 days before the deadline.

OTP

OTP had ten requests for EMS during 2023 and granted it to all. This is an increase from six customers with EMS in 2022.¹⁰⁶

OTP has an EMS visibility plan, which consists of a bill insert in August, a brochure in its New Customer Packets, language on its website, as well as customer service representatives educating customers on this protection.¹⁰⁷

G. 7826.1900 Customer Deposits

Table 23: Reporting Required by MN Rule 7826.1800

Utility	Customers required to make a deposit as a condition of receiving service (#)
Xcel	✓
MP	✓
OTP	✓

The Department acknowledged OTP, MP, and Xcel’s fulfillment of the requirements of Minnesota Rules, part 7826.1900.¹⁰⁸

Xcel

In 2023, Xcel requested 409 deposits as a condition of service from residential customers that had filed for bankruptcy. The deposits were requested after Xcel received a notification from bankruptcy court or from the customer.¹⁰⁹

¹⁰⁵ 24-29 (MP) report, April 1, 2024, p. 92.

¹⁰⁶ 24-30 (OTP) Department comments, June 14, 2024, p. 20.

¹⁰⁷ 24-30 (OTP) report, April 1, 2024, p. 62.

¹⁰⁸ 24-27 (Xcel) Department comments, June 14, 2024, p. 17; 24-29 (MP) Department comments, June 14, 2024, p. 22; 24-30 (OTP) Department comments, June 14, 2024, p. 20.

¹⁰⁹ 24-27 (Xcel) report, April 1, 2024, p. 13.

The Department says that the number of deposits in 2023 was 73% higher than 2022.¹¹⁰

Table 24: Metric to be Monitored in Xcel’s 2023 Report re: Customer Deposits

Metric from the 2022 Report to be Monitored	Result from the 2023 Report
<i>Commission Order did not allow service deposits through April 2022. Xcel is only collecting deposits for customers declaring bankruptcy. Staff will monitor if the number of deposits rises in 2023 when Xcel can collect through the whole year and if Xcel will be requiring deposits for customers not in bankruptcy proceedings.</i>	The number of customer deposits collected increased from 237 in 2022 to 409 in 2023. Staff will continue to monitor this metric to find if the number of customer deposits collected increases again in 2024.

MP

MP did not require any customers to make a deposit in 2023. The Company stopped the process in 2014. MP says that deposits “may be reconsidered in the future or as part of a specific electric service agreement provision for a commercial or industrial customer.”¹¹¹

OTP

No customers were required to make a deposit in 2023. OTP stopped collecting deposits in 2020 as part of the COVID-19 disconnection moratorium. The Company will continue assessing the need to collect deposits and will reinstate the process, if necessary.¹¹²

H. 7826.2000 Customer Complaints

The annual service quality report must include a detailed report on complaints by customer class and calendar month, including at least the following information:

Table 25: Reporting Required by MN Rule 7826.2000

Utility	Complaints received (#)	Complaints alleging billing errors, inaccurate metering, wrongful disconnection, high bills, inadequate service, service-extension or restoration intervals, and any other issue involved in ≥5% of complaints (# & %)	Method and timing of resolution	Complaints forwarded to the Utility by the CAO for further action (#)
Xcel	✓	✓	✓	✓
MP	✓	✓	✓	✓
OTP	✓	✓	✓	✓

¹¹⁰ 24-27 (Xcel) Department comments, June 14, 2024, p. 17.

¹¹¹ 24-29 (MP) report, April 1, 2024, p. 93.

¹¹² 24-30 (OTP) report, April 1, 2024, p. 63.

The Department acknowledged Xcel, MP, and OTP’s fulfillment of the requirements of Minnesota Rules, part 7826.2000.¹¹³ In its analysis, the Department wrote that complaints are “an important category for service quality, perhaps the most important.”¹¹⁴

In the 2020 SRSQ Order, the Department and electric IOUs, along with Commission Staff and CAO, were charged with revising the categories for reporting complaint data, starting with the 2023 SRSQ report.¹¹⁵ The four categories that were decided upon are below:

Table 26: Complaint Categories¹¹⁶

Complaint Categories	Examples
Inadequate Service – Field/Operations	<i>Field work delays</i> <i>Property damage related to unnecessary work/maintenance</i> <i>Scheduling delays/cancellations, etc.</i>
Inadequate Service – Customer Service	<i>Responsiveness</i> <i>Misapplied payments</i> <i>Unsatisfactory employee experience</i>
Inadequate Service – Programs and Services	<i>Missing rebates</i> <i>Energy Audit issues</i> <i>EV issues</i>
Inadequate Service – Cold Weather Rule Protection	<i>Resetting CWR payment plan</i> <i>Payment amounts</i>

Below is a table showing how many complaints were made each year, how many were resolved immediately, and the top two most common complaints:

Table 27: Customer Complaints

Utility	Year	Total Complaints	Resolved Within 1 Day (%)	Most Common Complaint
Xcel	2019	756	14%	Inadequate Service
	2020	430	14%	Inadequate Service
	2021	484	11%	Inadequate Service
	2022	634	9%	Inadequate Service
	2023	759	N/A	Billing Error
MP	2019	525	60%	High Bill
	2020	545	52%	High Bill
	2021	513	30%	High Bill

¹¹³ 24-27 (Xcel) Department comments, June 14, 2024, p. 19; 24-29 (MP) Department comments, June 14, 2024, p. 23; 24-30 (OTP) Department comments, June 14, 2024, p. 21.

¹¹⁴ 24-27 (Xcel) Department comments, June 14, 2024, p. 18.

¹¹⁵ 20-406 Commission ORDER ACCEPTING REPORTS, REQUIRING ADDITIONAL FILINGS, AND ESTABLISHING WORKSHOP, December 18, 2020, Order Point 16, p. 9.

¹¹⁶ 24-29 (MP) report, April 1, 2024, pp. 98-99.

	2022	346	14%	High Bill
	2023	161	16%	High Bill
OTP	2019	28	54%	High Bills
	2020	30	80%	High Bills
	2021	113	94%	Alleged Billing Errors
	2022	109	82%	High Bills
	2023	85	80%	Alleged Billing Errors

Xcel

For more details on Xcel's 2023 complaints, consult the 02-2034/12-383 briefing papers filed on September 11, 2024 and the summary of the 2023 Quality of Service Plan (QSP) proceeding on pp. 38-39 of these briefing papers.

CAO handled 759 complaints from Xcel's customers in 2023. The Company's call center received 33,732 complaints. Both of these measures were more than in 2022. 26.4% of residential customers' complaints were resolved within 10 days.

The two complaint categories that increased the most in 2023 were wrongful disconnect and billing error.¹¹⁷ The below table is a selected summary of customer complaints from the Department. It displays the percentage of complaints under the three most common codes:

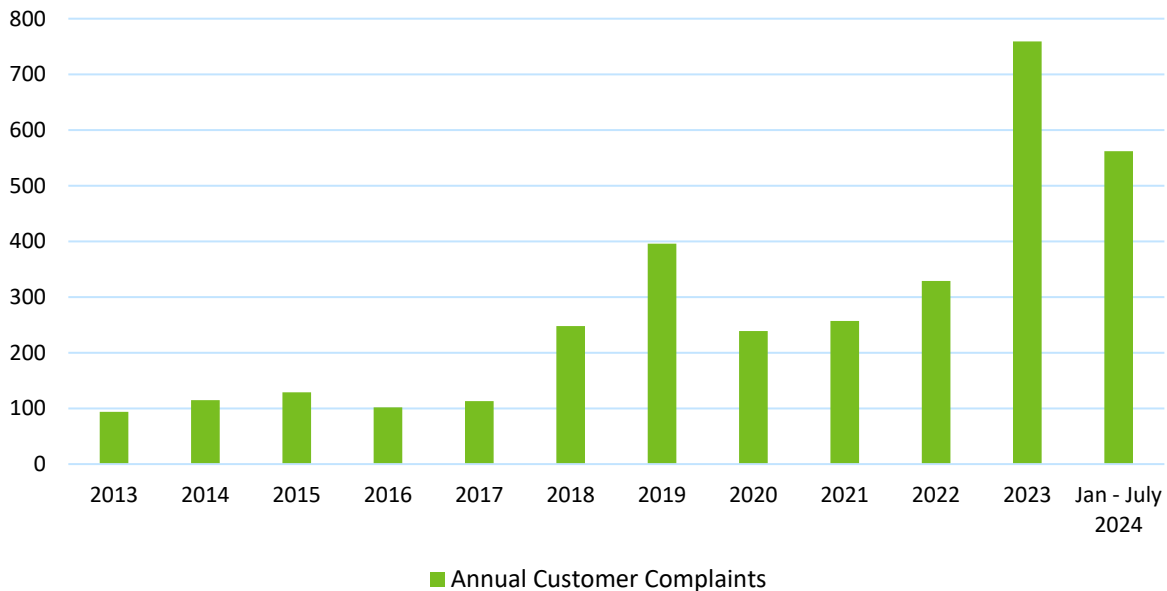
Table 28: Summary of Customer Complaints (2019-2023)¹¹⁸

Year	Number of Complaints	Inadequate Service	Wrongful Disconnect	Billing Error
2019	756	60%	17%	11%
2020	430	57%	4%	16%
2021	484	57%	7%	17%
2022	635	52%	5%	23%
2023	759	32%	22%	34%

The figure below shows the dramatic spike in complaints filed with CAO in 2023 versus the last decade:

¹¹⁷ 24-27 (Xcel) Department comments, June 14, 2024, pp. 18-19.

¹¹⁸ 24-27 (Xcel) Department comments, June 14, 2024, Table 11, p. 19.

Figure 13: Complaints Filed with CAO as Reported by Xcel (2013 – January-July 2024)

Staff asked CAO to run a report of its logged complaints from Xcel customers in 2023 to compare against Xcel’s reported number of complaints. CAO reported that it received 793 complaints in 2023. 793 is the number Xcel and CAO agreed upon per the monthly utility report that CAO sends each month. This is a difference of 34 complaints between Xcel’s 2023 QSP report and CAO’s report. CAO surmised that Xcel may have subtracted complaints that the Company argued were inquiries instead. When this happens, CAO cites Xcel’s QSP tariff:

This metric measures the number of Customer Complaints submitted by the Commission’s Consumer Affairs Office. ... Customer complaints will be recorded and reported with no exclusions.¹¹⁹

In 2023, the discrepancy also surrounded CAO’s long standing policy of classifying an Inquiry based on whether the customer had approached the utility first to give Xcel an opportunity to resolve the issue before it becomes a complaint. CAO has informed all utilities that this is their policy.

CAO’s Consumer Complaint Mediators code each complaint per the customer’s overall issue. Cases that CAO coded as a complaint under “CWR Appeal” may not be counted by the Company as a complaint.¹²⁰ CAO believes that CWR appeals are complaints, because the utility

¹¹⁹ [Xcel Energy Minnesota Electric Rate Book, Section No. 6, 3rd Revised Sheet No. 7.7.](#)

¹²⁰ [Minn. Stat. § 216B.096, subd. 8 Disputes; customer appeals.](#)

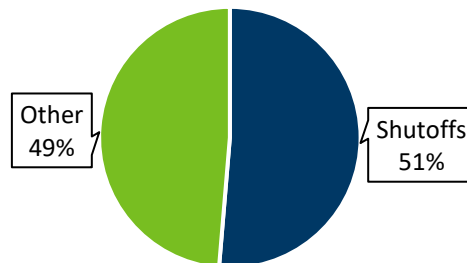
(a) A utility must provide the customer and any designated third party with a commission-approved written notice of the right to appeal:

- (1) a utility determination that the customer's household income is more than 50 percent of state median household income; or
- (2) when the utility and customer are unable to agree on the establishment or modification of a payment agreement.

failed to resolve the issue with the customer.

CAO ran a report from its database of all complaints and inquiries from Xcel customers in 2023. In total, CAO has 828 records. 425 of those are coded as “Disconnection/Reconnection,” “Payment Arrangement/Plan,” or “CWR Appeal.” All three codes relate to service shutoffs and reconnection.

Figure 14: Complaint and Inquiry Codes as Reported by CAO (2023)¹²¹



In Figure 13, Staff included projected data from CAO’s complaint records for Xcel’s 2024 QSP report. For the figure, Staff kept the performance standard threshold steady at ≤ 380 complaints, even though there will likely be a slight increase. CAO reports that between January 1 and July 30, 2024, 562 complaints have already been filed. With five months left in the year, it is likely that the number of complaints filed in 2024 will exceed the number of complaints filed in 2023 and will more than double the QSP complaint performance standard.

DER Complaints

Xcel is also required to report its initial customer contact response time to DER and/or interconnection inquiries, complaints, or disputes through its call center, email, or otherwise in its SRSQ reports.¹²² Xcel has tracked emails to its solar program team, as well as initial phone contact with a customer or developer who submitted a complaint through a PAR group. The solar team’s two email addresses receive an estimated 500 email inquiries each week. Xcel receives 500 email inquiries per week from solar installers, developers, and customers.

Table 29: DER Initial Response Tracking Summary (2023)¹²³

<i>Number of total email messages in dataset</i>	44,787
<i>Number of initial external inquiries received</i>	11,093
<i>Average response duration in business days</i>	2.3 days
<i>Number of PAR customer complaints</i>	21
<i>Average PAR response duration in business days</i>	8 days

Based on a workgroup convened by Commission Staff with CAO and Xcel per Commission

¹²¹ As reported by CAO’s complaint tracking system.

¹²² 22-162 November 9, 2023 Commission Order, Order Point 7.

¹²³ 23-27 (Xcel) report, April 1, 2024, Table 6a, p. 20.

Order, DER complaints have been broken down into three subcategories.¹²⁴

1. Billing
2. Interconnection
3. Other¹²⁵

In 2023, Xcel received 21 total DER complaints. A breakdown is below:

Table 30: Xcel DER Complaint Count Summary (2022-2023)¹²⁶

Complaint Categories	2022 Complaint Count	2023 Complaint Count
Billing <i>Complaints related to the solar bill presentation, not a Rule or tariff</i> <i>Customer disputes solar credit</i>	18	3
Interconnection <i>Customer states delay in meter set for billing</i> <i>Customer states construction for solar account is delayed</i> <i>Installer files complaint instead of customer</i>	18	9
Other <i>PUC inquiry</i> <i>Customer does not understand the installation of solar system</i> <i>Unable to classify the complaint in a specific category</i>	14	9
Total Complaints	50	21

In 2023, Xcel received less than half of the DER complaints it received in 2022.

AMI Complaints

Xcel customers received nine complaints related to AMI opt-outs. None of them were related to disconnections or credit-related activity.¹²⁷

2023 QSP Report

Xcel's Under Performance Payment tariff requires the Company to file a QSP report annually on May 1st.¹²⁸ The report contains performance standards that Xcel must meet, one of which is whether the number of complaints submitted to CAO by Xcel's customers exceeds 0.2059 complaints per 1,000 customers. If Xcel exceeds the standard, Xcel has incurred a \$1 million penalty. 50% of the penalty will be applied to customer bills, and the other 50% will be added to the Company's distribution fund.

¹²⁴ 21-237 Commission Order, December 2, 2021, Order Point 6, p. 2.

¹²⁵ 24-27 (Xcel) Xcel report, April 1, 2024, pp. 16-17.

¹²⁶ 24-27 (Xcel) Xcel report, April 1, 2024, Table 5, p. 17.

¹²⁷ 23-27 (Xcel) report, April 1, 2024, p. 25.

¹²⁸ [Xcel Energy Minnesota Electric Rate Book, Section No. 6, 3rd Revised Sheet No. 7.5 – 7.11.](#)

In 2023, the complaint threshold was ≤ 380 complaints. Xcel exceeded the complaint threshold with a total of 759 complaints. In its QSP report, Xcel proposed that the distribution portion of the under performance payment to waive reconnection fees for customers as long as the funds last.¹²⁹ In response to Fresh Energy's recommendation to use the \$500,000 for payment plans to assist very low-income customers enter into payment plans, Xcel proposed three direct credit options in its reply comments.¹³⁰ At its September 19, 2024, the Commission moved to apply a \$500 direct credit to customers, in order of oldest outstanding balance first, that:

- Are unable to participate in Xcel's proposed pilot program in Docket No. E-002/M-24-27;
- Have a past due balance greater than \$5,000;
- Have not otherwise received energy assistance;
- Have made a payment within the last 90 days; and
- Live within specified low-income census block groups starting with the census blocks with the lowest income.¹³¹

MP

Complaints to MP

In 2023, MP received 161 complaints from its customers.¹³² 91% of those complaints came from the Company's residential customers. 16% of complaints to the Company were solved in the first day.

High bills have consistently been the top complaint historically. In 2023, 82% of the complaints were about high bills. This is the highest it has been in the last five years. The Company's interim rates went into effect on January 1, 2024, and therefore, MP anticipates a higher number of complaints in 2024.¹³³ The second highest complaint category for residential customers is Service Restoration.

CAO Complaints

25 complaints came to MP from CAO in 2023, which is less than the 32 complaints in 2022.¹³⁴

¹²⁹ 02-2034 & 12-383 Xcel 2023 QSP Report, May 1, 2024, p. 5.

¹³⁰ 02-2034 & 12-383 Xcel reply comments, June 24, 2024, pp. 4-5.

¹³¹ 02-2034 & 12-383 Commission ORDER ON DISTRIBUTION OF UNDERPERFORMANCE PENALTY, October 9, 2024, Order Point 1, p. 5.

¹³² 24-29 (MP) Department comments, June 14, 2024, 2024, Table 12, p. 23.

¹³³ 24-29 (MP) Department comments, June 14, 2024, 2024, p. 23.

¹³⁴ 24-29 (MP) Department comments, June 14, 2024, 2024, p. 23.

Table 31: Metric to be Monitored in MP's 2023 Report re: Customer Complaints

Metric from the 2022 Report to be Monitored	Result from the 2023 Report
<i>MP's customer complaint metrics in 2022 were all the highest or lowest they have in the last six years. Staff will monitor all customer complaint metrics in 2023's SRSQ report, but in particular, will focus on whether complaints will continue to be low and billing errors will continue to be high.</i>	Staff is unable to make an accurate comparison between the complaint categories in 2022 and 2023 due to the reorganization of the categories using the Inadequate Service categories.

OTP*Complaints to OTP*

OTP received 85 complaints from its customers in 2023. This is a decrease from 109 complaints in 2022. The majority of the complaints (46%) are coded as "Inadequate Service – Field/Operations."¹³⁵ 95% of the complaints were resolved upon initial inquiry.¹³⁶

CAO Complaints

CAO forwarded five complaints to OTP in 2023. Four have been resolved. In 2021 and 2022, seven complaints were forwarded from CAO. The remaining complaint was still being worked on at the time of this filing.¹³⁷

I. Website and Other Electronic Communications

Beginning with data for 2020, the Commission ordered utilities to provide greater detail on electronic means of customer communication, beyond utility call centers.¹³⁸ To establish a baseline, utilities were ordered to provide information on electronic utility-customer interactions. More, beginning in April 2023, utilities were ordered "to provide percentage uptime and error rate percentage information in their annual reports for the next three reporting cycles, to build baselines for additional web-based service metrics."¹³⁹

Table 32: Reporting Required by Commission Order re: Website and Electronic Communications

Utility	Website visits (#)	Logins via electronic customer communication platforms (#)	Emails or other electronic communication received, categorized by subject (#)	Uptime and error rate for website, payment services, and outage info (%)
Xcel	✓	✓	✓	✓

¹³⁵ 24-30 (OTP) report, April 1, 2024, Table 37, p. 64.

¹³⁶ 24-30 (OTP) report, April 1, 2024, Table 38, p. 65.

¹³⁷ 24-30 (OTP) report, April 1, 2024, p. 66.

¹³⁸ 20-401, 20-404, and 20-406, Order December 18, 2020, Para. 14.

¹³⁹ 21-230, 21-225, and 21-237 Order, December 2, 2021, Paras. 2-4.

MP	✓	✓	✓	✓
OTP	✓	✓	✓	✓

The Department acknowledged Xcel, MP, and OTP’s fulfillment of the requirements of Commission Orders.¹⁴⁰

Table 33: Yearly Total Electronic Customer Communication (2020-2023)

Utility	Year	My Account/Mobile App	Website	Social Media ¹⁴¹	Emails
Xcel	2020	15,910,472	12,673,590		235,210
	2021	17,818,268	14,351,582		121,679
	2022	14,458,009	10,669,980		83,952
	2023	13,810,662	10,087,594		101,131
MP	2020	339,242	1,314,540	35,111	12,722
	2021	490,667	1,598,725	62,333	16,927
	2022	850,123	1,879,499	17,329	16,320
	2023	822,837	1,667,700	30,091	17,065
OTP	2020	N/A	2,349,795	32,983	2,294
	2021	72,108	2,314,977	37,705	5,701
	2022	44,453	1,370,745	86,036	9,579
	2023	46,330	3,180,363	84,683	1,675

Xcel

Xcel no longer uses email to communicate with customers due to poor customer satisfaction and is instead now using its mobile app and MyAccount website. The above “customer service electronic communications received” section is in regard to LIHEAP and MAP. Xcel’s PAR works with the Community Action Agencies (commonly known as CAP agencies) through a live portal to enroll customers in LIHEAP. The MAP receives applications through email and mail, so Xcel counted each application as communication.¹⁴²

The Department noted that Xcel’s website visits/logins are lower than 2022 and the 3-year

¹⁴⁰ 24-27 (Xcel) Department comments, June 14, 2024, p. 22; 24-29 (MP) Department reply comments, August 6, 2024, p. 2; 24-30 (OTP) Department comments, June 14, 2024, pp. 27-28.

¹⁴¹ Social media could include Facebook, Instagram, LinkedIn, and/or Twitter.

¹⁴² 24-27 (Xcel) report, April 1, 2024, p. 22.

average. Live portal contact in 2023 increased since 2022 but is lower than the 3-year average.¹⁴³

Xcel’s percent uptime for its website, payment services, and outage map are all more than 99%. The average error rate percentage is less than 0.2%.¹⁴⁴

MP

In a recent customer survey, MP found that 40% use the Company’s website, and 31% use the app. 97% of the customer respondents rate their level of satisfaction as “good” or “excellent.”

MP says that decreased website usage since 2022 is likely due to engagement through other channels and less weather and outage events in 2023.¹⁴⁵

The vast majority of email subject matters is fuel assistance. MP received 8,001 emails about fuel assistance in 2023. The next category (Miscellaneous) were 3,045 emails.¹⁴⁶

MP’s percent uptime on MNPower.com, outage reporting, outage map, Speedpay.com online payment service, and MyAccount were all close to 100%, which is consistent with 2022.¹⁴⁷ The average error rate percentage was 0.64%.¹⁴⁸

OTP

OTP’s website views are up significantly from the 2022 report (132%). However, the code to report analytics was broken for the latter half of 2022, so this figure may not be meaningful.

OTP’s percent uptime for its website, payment services, and outage map are more than 99%. The average error rate percentage was 0.13%.¹⁴⁹

Table 34: Metric to be Monitored in OTP’s 2023 Report re: Website and Other Electronic Communications

Metric from the 2022 Report to be Monitored	Result from the 2023 Report
<i>Staff will monitor OTP’s web analytics in 2023, now that they have been corrected.</i>	Web visits appear to have raised, but it is hard to do an analysis compared to 2022. Staff will continue to monitor this metric in the 2024 report.

¹⁴³ 24-27 (Xcel) Department comments, June 14, 2024, p. 22.

¹⁴⁴ 24-27 (Xcel) report, April 1, 2024, p. 21.

¹⁴⁵ 24-29 (MP) report, April 1, 2024, p. 67.

¹⁴⁶ 24-29 (MP) report, April 1, 2024, Figure 17, p. 69.

¹⁴⁷ 24-29 (MP) report, April 1, 2024, p. 70.

¹⁴⁸ 24-29 (MP) MP reply comments, Attachment A, July 22, 2024, p. 2.

¹⁴⁹ 24-30 (OTP) Department comments, June 14, 2024, Table 15, p. 27.

J. Public Facing Summaries

In response to Commission Order, all three utilities are required to display a summary about its service quality on its public website.¹⁵⁰

Xcel

Xcel’s public facing summary is available within two-clicks of its home page.¹⁵¹ Xcel believes that it is more intuitive to have the public facing summary on the page that is within two-clicks of the homepage ([How We Restore Power | Outages & Safety | Xcel Energy](#)), instead of the page that is one-click ([Outages and Safety | Xcel Energy](#)).¹⁵²

The Department recommended that the Commission require Xcel to modify its webpage so that the summary is within one-click of the homepage on the Outages and Safety page.¹⁵³ In its October 18, 2024 comments, Xcel stated that it had made the change to its website.¹⁵⁴

Table 35: Metric to be Monitored in Xcel’s 2023 Report re: Public Facing Summary

Metric from the 2022 Report to be Monitored	Result from the 2023 Report
<i>Staff was unable to find Xcel’s public facing summary on its website. Staff will monitor whether Xcel adds this information to its website in the 2023 SRSQ report.</i>	Xcel has added this information to their website.

MP

MP’s public facing summary is within one-click of the home page.¹⁵⁵

OTP

OTP’s public facing summary is at www.otpc.com/help-center/ and can be found within one-click from the homepage.

K. Xcel’s Customer Satisfaction

Xcel is required to file customer satisfaction metrics in its SRSQ. The Department stated that because the reporting requirements in the Company’s Annual Performance-Based Ratemaking (PBR) docket (17-401) are similar, “the Department inferred that the two reporting

¹⁵⁰ 21-230; 21-225; 21-237 Order, December 2, 2021, Para 7.

¹⁵¹ <https://mn.my.xcelenergy.com/s/outage-safety/restore-power>

¹⁵² 24-27 (Xcel) Xcel reply comments, June 24, 2024, p. 12.

¹⁵³ 24-27 (Xcel) Department supplemental comments, October 14, 2024, p. 3.

¹⁵⁴ 23-27 (Xcel) Xcel supplemental comments, October 18, 2024, p. 1.

¹⁵⁵ <https://minnesotapower.blob.core.windows.net/content/Content/Documents/Company/Transmission>.

requirements listed for the SRSQ have been superseded formally or informally.”¹⁵⁶ The Department stated that if it is incorrect, it will look for Xcel to provide the information in its 2024 SRSQ.

IV. Metrics to be Monitored in the 2024 Reports

Table 36 below displays all of the metrics that Staff will be monitoring in the 2024 SRSQ reports. Note that there are no reporting metrics from MP that Staff will be monitoring.

Table 36: Metrics to the Monitored in the 2023 SRSQ Reports

Metrics	Xcel	OTP
Meter Reading Performance	Xcel’s meters not read for 6-12 months and 12+ months have greatly increased since 2022. Staff will monitor whether meters not read for an extended period of time is a continuing trend.	N/A
Involuntary Disconnections	Xcel’s involuntary disconnections in 2023 and continuing into 2024 are much higher than in the past. <i>Staff will address involuntary disconnections in Vol. 3 of the briefing papers.</i>	In its 2023 SRSQ report, OTP did not report on its other payment arrangement options for customers. Staff asks for OTP to share how customer service representatives create payment arrangements, including any other standard payment arrangements it offers to customers outside of the CWR payment plans, in its 2024 SRSQ report. In 2023, less than 8% of OTP’s restorations after a shutoff were done by entering into a payment plan. This is a further decrease from 2022. Staff will continue to monitor this metric in OTP’s 2024 SRSQ report.
EMS	Xcel will be implementing a “direct submit” button for emergency medical forms. Staff will investigate whether implementing the “direct submit” button will reduce the number of customers denied for EMS.	N/A
Customer Deposits	The number of customer deposits Xcel collected increased from 237 in 2022 to 409 in 2023. Staff will continue to monitor this metric to find if the number	N/A

¹⁵⁶ 24-27 (Xcel) Department comments, June 14, 2024, p. 28.

	of customer deposits collected increase again in 2024.	
Customer Complaints	Xcel is on track to exceed its customer complaint threshold in the QSP again in 2024. Staff will report on the 2024 QSP proceedings in the 2024 SRSQ briefing papers.	N/A
Customer Satisfaction	Xcel is required to file J.D. Power Residential Customer Satisfaction Metrics, but did not include this, instead including identical information from its Annual Performance-Based Ratemaking docket (17-401). Staff will be looking for Xcel to file survey results in the 2024 SRSQ.	N/A

V. Decision Options

II. Decision Options

1. Accept Xcel Energy, Minnesota Power, and Otter Tail Power Company’s 2023 Safety, Reliability, and Service Quality Reports. *(Xcel, MP, OTP, Department)*

Volume 1 Decision Options

Staff note: a supplemental filing is required after the IEEE benchmarking data is posted, as that does not happen until after the April 1 filing deadline. This is consistent with last year’s reports and included in the decision options setting each utility’s benchmarking standards for 2024. Decision Options 2-4 maintain the same IEEE benchmarking comparisons (e.g. second quartile and utility size) for the utilities’ reliability standards.

2. Set Minnesota Power’s 2024 statewide Reliability Standard at the IEEE benchmarking second Quartile for medium utilities. Set Minnesota Power’s work center reliability standards at the IEEE benchmarking second quartile for small utilities. Require Minnesota Power to file a supplement to its 2024 SRSQ report 30 days after IEEE publishes the 2023 benchmarking results, with an explanation for any standards the utility did not meet. *(Minnesota Power, Department)*
3. Set Otter Tail Power’s 2024 statewide Reliability Standard at the IEEE benchmarking second Quartile for medium utilities. Set Otter Tail’s work center reliability standards at the IEEE benchmarking second quartile for medium utilities. Require Otter Tail Power to file a supplement to its 2024 SRSQ report 30 days after IEEE publishes the 2023 benchmarking results, with an explanation for any standards the utility did not meet. *(Otter Tail Power, Department)*

4. Set Xcel Energy's 2024 statewide Reliability Standard at the IEEE benchmarking second Quartile for large utilities. Set Xcel Energy's Southeast and Northwest work center reliability standards at the IEEE benchmarking second quartile for medium utilities. Set Xcel's Metro East and Metro West work center reliability center standards at the IEEE benchmarking second quartile for large utilities. Require Xcel Energy to file a supplement to its 2024 SRSQ report 30 days after IEEE publishes the 2024 benchmarking results, with an explanation for any standards the utility did not meet. (*Xcel, Department*)
5. Direct Minnesota Power and Otter Tail Power to include a discussion on alternative approaches to reliability standard setting in their 2024 SRSQ Reports. (Department)
 - a. Direct Minnesota Power and Otter Tail Power to include a discussion on the IEEE reporting sample size and data exclusion challenges from this year. (Staff)
 - b. Direct Minnesota Power and Otter Tail power to include a discussion of using the EIA 861 data to benchmark utility reliability performance. (Staff)
6. Direct Otter Tail Power to include in its 2024 SRSQ report performance data for 2024 from both its Interruption Monitoring System (IMS) and their Outage Management System (OMS), if available. (Department)
7. Direct MP to include a discussion on the impact of its new OMS on reporting metrics and a comparison of data from its existing OMS system and its new OMS data, as available, in its 2024 SRSQ Report. (*Department*)

Volume 2 Decision Options

8. Accept Xcel Energy's compliance report on metrics regarding its Emergency Medical Account as ordered in Docket No. E-002/M-22-233. (*Xcel, Department*)

Volume 3 Decision Options

Disparities in Service Quality

Disconnection Variance

9. Grant Xcel Energy's request for a temporary extension of the variance to Minn. Rule 7820.2500 regarding AMI disconnection as approved in the Commission's March 22, 2023 Order in Docket No. E-002/M-22-233. (*Xcel, Department, ECC/CUB*)
 - a. Extend the variance until the Commission issues a decision on the variance request as presented in the 2024 SRSQ report.
 - b. Apply the extended variance retroactively starting from the expiration of the previous variance on April 22, 2024.
10. Deny Xcel Energy's request to extend its variance and perform remote disconnections. (*GECs*)

11. As a condition of extending the remote disconnection variance, eliminate voicemail messages as a permissible form of final contact before remote disconnection for Xcel Energy. (*GECs, Fresh Energy*)
12. Increase the existing threshold of final contact for disconnection to require Xcel Energy to use two methods of electronic communication, including either text message or email in addition to voicemail. (*Xcel, Department, ECC/CUB*)

Disconnection Moratorium

13. Require Xcel Energy to halt all disconnections until Xcel has implemented a plan to address disparities and has specifically demonstrated that remote disconnection does not increase the disparities. (*GECs, Sierra Club, OAG*)
14. Require Xcel Energy to halt all disconnections for customers in very low-income census block groups with high concentrations of POC until Xcel has implemented a plan to address disparities and has specifically demonstrated that remote disconnection does not increase the disparities. (*Fresh Energy, alternative to service territory disconnection*)
15. Require Xcel Energy to work with interested stakeholders to evaluate the impact of a moratorium on the Automatic Bill Credit Pilot. (*Department*)
16. Require Xcel Energy to work with interested stakeholders to evaluate the financial effects of a moratorium on disconnections over a two-year period. (*Department*)

Outreach

17. Approve Xcel Energy's proposal to identify customers throughout its service territory that have not received LIHEAP assistance and are carrying past due balances, and approve the Company's proposal to perform targeted outreach to the identified customers. (*Xcel, Department*)
18. Require Xcel Energy to perform additional outreach throughout its service territory with the goal of increasing participation in affordability programs that reduce bad debt. (*Staff interpretation of Edina, Xcel, GECs*)

Policy Transparency

19. Require Xcel to publish its disconnection and payment agreement policies and practices on its website. Subject to technical feasibility, Xcel shall make the edits discussed in ECC/CUB's September 12, 2024 comments to its payment agreement webpage. (*Xcel, Department, ECC/CUB*)
20. Require Xcel to make a filing in the instant docket and Docket E,G-999/PR-24-02 detailing its current disconnection policies and practices, and require Xcel to submit

additional filings in Docket E,G-999/PRYR-02 when there are changes to those policies and practices within 20 days of the Order. *(Xcel, Department, ECC/CUB)*

Additional Strategies

21. Approve Xcel Energy's proposal to restore power for involuntarily disconnected customers with AMI during the duration of a heat advisory or excessive heat warning issued by the National Weather Service. *(Xcel, Department, CUB/ECC, GECs)*
22. Require Xcel Energy to restore power for involuntarily disconnected customers with AMI when AQI alerts of 151 or higher have been issued. *(GECs)*
23. Require Xcel Energy to reduce its down payment requirements and modify its disconnection and payment agreement practices to include consideration of individual household financial circumstances. *(Xcel, CUB/ECC, Fresh Energy)*
24. Prohibit Xcel Energy from sending disconnection notices until a customer's balance reaches \$180 past due. *(Xcel, Department, CUB/ECC, GECs)*
25. Prohibit Xcel Energy from disconnecting customers with a past due balance below \$300. *(Xcel, Department, CUB/ECC, GECs)*
26. Require Xcel Energy to wait at least 10 days after sending a disconnection notice before disconnecting a customer. *(Xcel, Department, CUB/ECC)*
27. Require Xcel to evaluate implementing the following policies and to file the evaluation by [insert date] in [insert docket]. *(Staff interpretation of GECs, Xcel)*
 - a. Restoring power to involuntarily disconnected customers with AMI when AQI alerts of 151 or high have been issued.
 - b. Setting the reconnection fee at \$0. The evaluation shall include an estimate of the costs of waiving reconnection fees and how the Company would propose to recover those costs. *(Staff interpretation of GECs and Xcel)*
 - c. Elimination of interest payments on late bill payment fees or donation of those fees to low-income customer assistance programs, similar to the approach used by Xcel in Colorado. *(GECs)*
 - d. A proposal to increase the number of customers receiving pre-weatherization, weatherization, and energy efficiency improvements, including deep retrofits to create greater energy savings, in areas within the Company's service territory with high concentrations of people of color being disconnected. The proposal should include year over year targets designed to increase the number of people receiving energy efficiency measures. *(Fresh Energy)*
 - e. A more robust hot-weather rule to prevent disconnections in months with the highest cooling energy burden. *(Staff interpretation of GECs)*
 - f. Creating an off-season LIHEAP program to help income-qualified residents clear their arrears by self-attesting to their income level. *(Xcel)*

m Staff Briefing Papers for Docket Nos. E-002/M-24-27 (Xcel); E-015/M-24-29 (MP); and E-017/M-24-30 (OTP)

28. Require Xcel to verify that it manages disconnections due to a landlord's failure to pay consistent with the requirements in Minn. R. 7820.1400. *(GECs)*
29. Require Xcel Energy to inform affected personnel of racial disparities in electric service. Require Xcel to file a compliance report with its annual SRSQ filing on which employees received the training and what information was provided. *(Fresh Energy)*
30. Allow Xcel to track increased bad debt from any adopted proposals and request an adjustment to its revenue requirement in its next rate case. *(Xcel, ECC/CUB)*
31. Where not otherwise noted, require Xcel to file any necessary revised tariff changes within 30 days of the Commission's Order. *(Staff)*

Reliability

32. Require Xcel Energy to file an enhanced vegetation management plan for areas disparately impacted by long duration outages. *(Xcel, City of Minneapolis)*
 - a. Require Xcel to file the proposal with its IDP due November 1, 2025. *(Staff)*
33. Require Xcel to file an enhanced vegetation management plan with a cost-benefit analysis with its IDP due November 1, 2025. In its filing, Xcel shall explain its analysis of the following to determine whether insufficient vegetation management was a causal factor in the identified disparities: *(OAG)*
 - a. Whether it found a correlation of CELI-12 problem areas with the location of infected trees using the Company's data combined with Department of Agriculture data.
 - b. Whether the areas identified CELI-12 disparities correlate to higher levels of tree canopy than other areas.
 - c. Whether vegetation outages caused the larger number of outages in the identified clusters of CELI-12 outages.
34. Require Xcel Energy to file a proposal to develop a targeted undergrounding plan for portions of North Minneapolis, South Minneapolis, and the area surrounding downtown St. Paul. *(Xcel, City of Minneapolis)*
 - a. Require Xcel to file the proposal with its IDP due November 1, 2025. *(Staff)*
35. Require Xcel to file revised and specific cost estimates tailored to Xcel's service territory of the cost per mile for targeted undergrounding in areas disparately impacted by long duration outages. *(OAG)*
 - a. Require Xcel to file the updated estimates with its IDP due November 1, 2025. *(Staff)*
36. Deny Xcel Energy's proposal to develop a targeted undergrounding plan for portions of North Minneapolis, South Minneapolis, and the area surrounding downtown St. Paul. *(DOC)*

37. Require Xcel to perform additional analysis as outlined in Decision Options XXX prior to developing a proposal for targeted undergrounding or enhanced vegetation management. *(Staff interpretation of DOC)*

Operational Changes

38. Require Xcel to propose potential operational changes in its outage-response efforts that would ensure more equitable distribution of repair efforts with its IDP due November 1, 2025. *(OAG)*
39. Require Xcel Energy to establish a rapid response team that will service outages in communities that are disparately impacted by long duration outages. *(Fresh Energy)*

ISQ Map

The Commission may choose DO xxx. It may also choose DO xxx; DO xxx OR xxx; DO xxx OR xxx; and some, all, or none of DO xxx and its subparts.

40. Require Xcel Energy to update its Interactive Service Quality Map to include two additional years of data. *(DOC)*
41. Require Xcel Energy to add the following data to its Interactive Service Quality Map by Census Block Group by April 1, 2025. *(Xcel, Edina, Fresh Energy, GEC)*
- a. Municipal Boundaries
 - b. Premise counts by census block group
 - c. Percentage of underground electric assets.
 - d. Percent of electric premises disconnected for 24 hours or more.
 - e. Average age of arrears for disconnected premises.
 - f. Per premise energy costs.
42. Require Xcel Energy to add to its Interactive Service Quality Map the average age of homes by Census Block Group by April 1, 2025. *(Xcel)*
- OR**
43. Require Xcel Energy to add to its Interactive Service Quality Map the average age of infrastructure in years by Census Block Group by April 1, 2025. *(Fresh Energy, GEC)*
44. Require Xcel Energy to add to its Interactive Service Quality Map total dollars past due of premises and total dollars past due of disconnected premises by April 1, 2025. *(GEC)*
- OR**
45. Require Xcel Energy to add to its Interactive Service Quality Map the average amount of arrears for disconnected premises by April 1, 2025. *(Xcel)*
46. Require Xcel Energy to add the following data to its Interactive Service Quality Map by Census Block Group by April 1, 2025.
- a. Capital investment and O&M (dollars). *(Fresh Energy, GEC)*

- b. Average outage duration (minutes). (*Fresh Energy, GEC, Edina*)
- c. Number of premises in each census group block group served by voltage of secondary distribution circuit and whether such circuits are (1) radial or networked, and (2) overhead or underground. (*GEC*)
- d. Extreme heat indicators such as extreme heat days, daily average temperature in summer months, or average surface temperatures. (*Fresh Energy, Edina*)
- e. Average hosting capacity available to premises. (*GEC*)
- f. Number of premises (1) disconnected once, twice, or three or more times and (2) reconnected once, twice, or three or more times. (*GEC*)
- g. Percent of electric premises receiving a disconnection notice. (*GEC*)
- h. Total dollars received from LIHEAP. (*GEC*)
- i. Number of disconnected premises that were enrolled in Energy Assistance Programs. (*GEC*)

Future Analyses, Reporting, and Processes

- 47. Require Xcel Energy to monitor and report on progress toward eliminating the racial disparities among customers who are involuntarily disconnected in future SRSQ reports. (*City of Minneapolis*)
- 48. Require Xcel Energy to monitor and report on disparities identified between income level and participation in low-income programs in future SRSQ reports. (*City of Minneapolis*)
- 49. Require Xcel Energy to report on discrepancies between the number of customers that have applied for and been enrolled in its medical protection programs in future SRSQ reports. (*CUB/ECC*)
- 50. Require Xcel Energy to file a cost-benefit analysis of combining the annual affordability reports and the SRSQ report in its April 1, 2025 SRSQ report in future SRSQ reports. (*DOC*)
- 51. Delegate authority to the Executive Secretary to work with Xcel and stakeholders to develop a proposal for what affordability and associated service quality data is reported in SRSQ report and what data continues to be reported in other dockets. The goal of the process is to develop a comprehensive list of existing affordability data reporting requirements and to identify which, if any, pieces of information are missing and should be included in future SRSQ reports. (*Staff*)

Future Analysis

- 52. Require Xcel Energy to conduct a study similar to the TCR Service Quality and Demographics Analysis on a three-year cycle with the next report due on April 1, 2027 with its SRSQ Report. (*Staff interpretation of Xcel, Department*)
 - a. Require Xcel to use five years of data for future analyses. (*Department*)

53. Require Xcel Energy to conduct a study similar to the TCR Service Quality and Demographics Analysis on an annual basis with the next report due on April 1, 2025 with its SRSQ Report. *(Staff interpretation of GEC)*
54. Require Xcel Energy to develop its data collected on causes of CELI-12 outages to inform which causes predominantly affect CBGs currently showing increased CELI-12. Require Xcel Energy to then analyze whether the primary causes emerging in CBGs with increased CELI-12 are caused by overhead assets. *(Xcel)*
 - a. Require Xcel to provide an analysis of distribution equipment vintages in the affected CELI-12 communities and analyze whether upgrading this equipment would be cost effective. *(OAG, Department, Xcel)*
55. Require Xcel Energy to 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. *(Xcel)*
56. Require Xcel Energy to hire an independent third-party evaluator with expertise in evaluating racial disparities to conduct a one-year study that will evaluate Xcel's practices and policies related to capital investment planning, outage restoration practices, and shutoff practices to better understand the causes of these discrepancies in shutoff rates and service reliability. Require Xcel Energy to engage interested stakeholders to participate and collaborate with the independent third-party evaluator. *(Fresh Energy)*
57. Delegate authority to the Executive Secretary to open a new docket focused on disparities identified in the TRC and Pradhan/Chan studies and Xcel Energy's efforts to reduce them. *(Staff interpretation of GEC and Fresh Energy)*