

December 15, 2025

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

RE: Supplemental Comments of the Minnesota Department of Commerce  
Docket No. E002/M-25-27

Dear Ms. Bergman,

Attached are the supplemental comments of the Minnesota Department of Commerce (Department) in the following matter:

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

The Report was filed by Xcel Energy (Xcel or the Company) on April 1, 2025. The Minnesota Department of Commerce (Department) filed its initial comments on July 15, 2025, and requested additional information from Xcel. Xcel filed its reply comments on August 8, 2025. The Department filed supplemental comments in response to the additional information provided by Xcel in reply comments on November 6, 2025. On November 19, 2025 Xcel filed its Supplemental Addendum responding to the International Electric and Electronic Engineers (IEEE) Distribution Reliability Working Group (DRWG) 2024 reliability benchmarking results.

The Department recommends approval of the Company's 2024 Service Reliability Report and continues to support its recommendations to approve the Company's Annual Safety and Service Quality Reports. The Department also provides an analysis of Xcel's proposed alternative method for calculating the Company's annual reliability goals in its Annual Service Reliability Report is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB  
Assistant Commissioner of Regulatory Analysis

JK, RW/ad  
Attachment

**Before the Minnesota Public Utilities Commission****Comments of the Minnesota Department of Commerce**

Docket No. E002/M-25-27

**I. INTRODUCTION**

On April 1, 2025, Northern States Power Company d/b/a Xcel Energy (Xcel or the Company) filed its 2024 Annual Safety, Reliability and Service Quality Standards Report (2024 SRSQ Report or Annual Report) in Docket No. E002/M-25-27 in compliance with the Public Utilities Commission (Commission) orders and the requirements of Minnesota Rules Chapter 7826.<sup>1</sup> The information in the Annual SRSQ Report provides an overview of the utility's operational performance for the previous year. It is also the filing in which the Commission determines an electric utility's reliability goals for the following year.

In initial comments, the Department requested additional information from Xcel to be provided in the Company's reply comments.<sup>2</sup> Xcel provided the requested information in reply comments.<sup>3</sup> The Department responded in supplemental comments and recommended the Commission accept Xcel's 2024 Safety Report and 2024 Service Quality Report. In those supplemental comments, the Department withheld its final recommendation on the Company's 2024 Reliability and Service Quality Standards Report, pending its review of Xcel's compliance filing containing the International Electric and Electronic Engineers (IEEE) Distribution Reliability Working Group (DRWG) 2024 benchmarking results.<sup>4</sup>

On November 7, Xcel filed supplemental comments detailing an alternative method to calculate medium and large utility second quartile benchmarks (Alternate Method) as IEEE had not yet provided its member utilities with all the statistical detail necessary for the Company to benchmark its 2024 actuals to IEEE's 2024 results.<sup>5</sup>

Also on November 7, The IEEE DRWG provided its members, including Xcel, the 2024 reliability results by utility size metrics.<sup>6</sup>

---

<sup>1</sup> *In the Matter of Northern States Power Company d/b/a Xcel Energy—Electric's 2024 Annual Safety, Reliability, and Service Quality Report*, Xcel Energy, SRSQ Report (all parts), April 1, 2025, Docket No. E002/M-25-27, (eDockets) [20254-217138-01](#), [20254-217138-03](#), and [20254-217138-05](#) (hereinafter "2024 Xcel SRSQ").

<sup>2</sup> Department, Comments, July 15, 2025, Docket No. E002/M-25-27, (eDockets) [20257-221024-01](#) (hereinafter "2024 Xcel SRSQ Department Comments") at 83.

<sup>3</sup> Xcel, Reply Comments, August 8 2025, (eDockets) [20258-221894-01](#) (hereinafter "2024 Xcel SRSQ Reply Comments").

<sup>4</sup> Department, Supplemental Comments, November 6, 2025, Docket No. E002/M-25-27, (eDockets) [202511-224709-01](#) (hereinafter "2024 Xcel SRSQ Department Supplemental Comments"), at 3.

<sup>5</sup> Xcel, Compliance - Supplement, November 7, 2025, Docket No. E002/M-25-27, (eDockets) [202511-224729-01](#) (hereinafter "2024 Xcel SRSQ Xcel Supplement"), at 1-2.

<sup>6</sup> Xcel, Supplemental Addendum, Compliance, November 19, 2025, Docket No. E002/M-25-27, (eDockets) [202511-225082-01](#) (hereinafter "2024 Xcel SRSQ Supplemental - Addendum"), at 1-2.

On November 19, Xcel filed a Supplemental Addendum in compliance with the Commission’s Order Points 6 and 7, in its Order Accepting Reports and Setting Additional Requirements dated January 13, 2025 in the Company’s 2024 SRSQ docket.<sup>7, 8</sup>

The present comments compare the Company’s 2024 reliability results with the appropriate IEEE 2024 benchmarks. In addition, the Department reviews the Company’s alternative method for determining its annual reliability standards discussed in Xcel’s November 7 filing.

The Department also notes that during its review of the Department’s July 15 comments in September 2025, Commission Staff expressed concerns regarding some inputs into the call center metric. The Department closely reviewed the information Commission staff identified and acknowledged that Department staff had made errors in transferring certain information into the spreadsheet used in the analysis. The Department apologizes for this oversight and has included corrected tables as well as a discussion of the effects of those corrections on Xcel’s call center metrics for 2022, 2023, and 2024 in these comments.<sup>9</sup>

## II. PROCEDURAL BACKGROUND

April 1, 2025	Xcel filed its 2024 SRSQ Report. <sup>10</sup>
April 7, 2025	Xcel filed an erratum that included updated Tables 28 and 29. <sup>11</sup>
April 7, 2025	The Commission filed a notice of comment period on Phase 1 of Xcel’s Safety, Reliability, and Service Quality Report Proceedings. The scope of the Notice was Xcel’s remote reconnection proposals during extreme heat events and poor air quality alerts required by the Commission’s January 13, 2025, Order in Docket No. E-002/M-24-27. <sup>12</sup>
April 30, 2025	The Commission issued a notice of comment period for the review of Xcel’s SRSQ Report. <sup>13</sup> The present comments address this notice of comment.

---

<sup>7</sup> *Ibid.*

<sup>8</sup> *In the Matter of Xcel Energy’s 2023 Annual Safety, Reliability, and Service Quality Report, Order Accepting Reports and Setting Additional Requirements*, January 13, 2025, Docket No. E002/M-24-27, (eDockets) [20251-213880-01](#) (hereinafter “2023 SRSQ Order”).

<sup>9</sup> See Attachment DOC-1-SCA.

<sup>10</sup> 2024 Xcel SRSQ.

<sup>11</sup> Xcel Energy, Errata Letter, April 7, 2025, Docket No. E002/M-25-27, (eDockets) [20254-217326-01](#).

<sup>12</sup> *In the Matter of Northern States Power Company d/b/a Xcel Energy—Electric’s 2024 Annual Safety, Reliability, and Service Quality Report, Notice of Comment Period on Phase 1 of Xcel Energy’s 2024 Safety, Reliability, and Service Quality Report Proceedings*, April 7, 2025, Docket No. E002/M-25-27, (eDockets) [20254-217296-01](#).

<sup>13</sup> *In the Matter of Northern States Power Company d/b/a Xcel Energy—Electric’s 2024 Annual Safety, Reliability, and Service Quality Report, Notice of Comment Period on 2024 Electric Safety, Reliability, and Service Quality Reports*, April 30, 2025, Docket No. E002/M-25-27, (eDockets) [20254-218387-01](#), (hereinafter “Commission Notice”).

July 11, 2025	The Environmental Law and Policy Center, and the Building Owners and Managers Association of Greater Minneapolis filed initial comments on the present matter.
July 15, 2025	The Department filed its initial comments in the present matter. <sup>14</sup>
August 8, 2025	Xcel Energy filed reply comments on the present matter. <sup>15</sup>
November 6, 2025	The Department filed supplemental comments. <sup>16</sup>
November 7, 2025	Xcel Energy filed its Alternate Method in the present docket. <sup>17</sup>
November 19, 2025	Xcel filed its Supplemental Addendum in to present docket comparing its reliability performance to the results of the IEEE report. <sup>18</sup>

Topic(s) open for comment:

- Should the Commission accept the Electric Utilities' 2024 Annual Safety, Reliability, and Service Quality (SRSQ) Reports?

### III. DEPARTMENT ANALYSIS

#### A. *COMPARISON OF XCEL'S 2024 RELIABILITY METRICS AND 2024 IEEE DRWG BENCHMARKING RESULTS*

On November 19, 2025, Xcel made a supplemental filing addendum in compliance with the Commission's Order Points 6 and 7 of in its January 15, 2025, Order in Docket No. E002/M-23-73. The Commission required the Company to submit a supplemental filing 30 days after the Institute for Electrical and Electronic Engineers (IEEE) published its 2024 reliability benchmarking results.

The submission of the 2024 IEEE Reliability Benchmarking information allows the Commission to compare Xcel's actual 2024 performance against the IEEE information.

Xcel noted in the November 19 filing that it exceeded four of the twelve work-center level, and one of the three state-wide IEEE benchmarks the Commission identified in its January 15<sup>th</sup> Order. The reliability goals the Company failed to meet were:

---

<sup>14</sup> 2024 Xcel SRSQ Department Comments.

<sup>15</sup> 2024 Xcel SRSQ Reply Comments.

<sup>16</sup> 2024 Xcel SRSQ Department Supplemental Comments.

<sup>17</sup> 2024 Xcel SRSQ Xcel Supplement.

<sup>18</sup> 2024 Xcel SRSQ Supplemental – Addendum.

- System Average Interruption Frequency Index (SAIFI) for the Company-wide Minnesota metric and Xcel’s Metro East and Metro West work centers.
- Customer Average Interruption Duration Index (CAIDI) for Xcel’s Northwest and Southeast work centers.

Table 1 summarizes Xcel’s results for 2024 compared to the appropriate IEED 2024 benchmarks.

**Table 1 – Xcel 2024 Reliability Performance vs. Commission-designated IEEE Benchmark**

Work Center	Metric	IEEE Benchmark	Xcel Performance	Met Benchmark?
Metro-East	SAIDI	120	115.5	Yes
	SAIFI	1.01	1.08	No
	CAIDI	118	107.15	Yes
Metro-West	SAIDI	120	101.37	Yes
	SAIFI	1.01	1.14	No
	CAIDI	118	88.58	Yes
Northwest	SAIDI	150	122.44	Yes
	SAIFI	1.15	0.92	Yes
	CAIDI	128	132.86	No
Southeast	SAIDI	150	121.49	Yes
	SAIFI	1.15	0.92	Yes
	CAIDI	128	131.52	No
All Minnesota Customers	SAIDI	120	110.04	Yes
	SAIFI	1.01	1.08	No
	CAIDI	118	101.95	Yes

A quick initial review could give the reviewer the perception that Xcel had very poor year in terms of reliability, as it missed one-third of the Commission’s reliability goals for the year.

As the Department noted in its Comments:

Xcel stated that many of the outages in 2024 were attributed to a high level of precipitation during June and then thunderstorms in July. The unusual weather led to many vegetation/weather events which damaged the distribution and transmission systems and were not lightning-related. These vegetation/weather-events, in turn, lead to overhead and underground equipment failures.<sup>19</sup>

<sup>19</sup> 2024 Xcel SRSQ Department Comments, at 14.

Also, in the normalization discussion included in the Department’s Comments, the Department noted that Xcel identified 15 Major Event Days in 2024 across its Minnesota service-territory. That was the highest number of MED’s identified by year in the last six years.<sup>20, 21</sup>

The Department’s interpretation of the Company’s 2024 reliability results is that unusually wet weather in June and thunderstorms in July resulted in a greater than normal surge in the number of outages on the Company’s electric distribution system. That result lead to an increase in the frequency of outages, which is reflected in Xcel’s exceeding the SAIFI IEEE threshold in both its metro cost centers and in its state-wide metric as well.<sup>22</sup>

The Company’s 2024 CAIDI results for its Northwest and Southeast work centers focus on outage duration not frequency, so the rationale developed above for Xcel’s SAIFI results for its Metro-area work does not fit the situation. For example, the Northwest work center had 5 MEDs in 2024 as opposed to 1 MED in 2023, but its annual SAIFI only declined slightly while its annual SAIDI increased significantly. For the Southeast work center, the number of MEDs were identical at 1 for both years. Its SAIFI declined quite a bit in 2024 relative to 2023 while the SAIDI also increased significantly in 2024. The 2024 CAIDI results for both work centers increased, more so for the Northwest than the Southeast work center. Table 2 summarizes this information.

**Table 2 – Xcel 2023 and 2024 Reliability for Northwest and Southwest Work Centers**

Work Center	Metric	2023 Results	2024 Results	Difference
Northwest	SAIDI	95.39	122.44	27.05
	SAIFI	0.9	0.92	0.02
	CAIDI	105.85	132.86	27.01
Southeast	SAIDI	87.28	121.49	34.21
	SAIFI	0.71	0.92	0.21
	CAIDI	122.43	131.52	9.09

Customer density also affects a utility’s CAIDI results. Hence, explaining CAIDI results becomes a more complicated explanation. Put simply, the Department doesn’t have the expertise to develop a rationale for why Xcel exceeded the IEEE CAIDI benchmark for 2024.

The fact that Xcel’s 2024 CAIDI results for the Northwest (132.86 minutes) and Southeast (131.52) work centers were only slightly above the 2024 IEEE goal of 128 minutes does lessen the Department’s

<sup>20</sup> *Ibid*, at 13.

<sup>21</sup> Xcel uses the IEEE 1366 normalization method for storm normalization, which excludes data due to major events such as large storms. To determine which singular events should be excluded from the reliability metrics data, Xcel compares the SAIDI for individual events to the IEEE’s Major Event Threshold. In cases where a storm or other event Xcel experienced has a greater SAIDI than the threshold, the data collected during those events are removed and this time-period is called a Major Event or Major Event Day (MED) and removed from the normalization calculation.

<sup>22</sup> 2024 Xcel SRSQ Department Comments, Table 4., at 13 identifies the highest annual number of MEDs in 2024 since at least 2018 for both those work-centers and the state-wide metric as well.

concern to some extent. The Department will continue to explore the Company's CAIDI results in future filings.

In addition, Xcel requested in the compliance that the Commission approve its proposed 2025 reliability goals. Those goals are identical to the reliability goals the Commission approved in 2024.

The Department recommends the Commission accept the information the Company submitted regarding the IEEE 2024 Reliability Benchmarking analysis and that the Commission adopt Xcel's proposed 2025 reliability goals.

*B. XCEL ALTERNATE METHOD FOR CALCULATING RELIABILITY BENCHMARKS*

Xcel filed its supplemental Alternate Method while awaiting the republishing of the IEEE DRWG's annual benchmarking results by utility size but later, following the republishing of the IEEE report, filed its Supplemental Addendum eliminating its Alternate Method. The Department notes that IEEE initially published Benchmark Year 2025 Results for 2024 Data on an all-respondent basis on August 15, 2025. IEEE later published updated results for the 2024 performance year which included utility-size based results on November 7, 2025.<sup>23</sup> This tiered results publishing is consistent with how IEEE published results for the 2023 performance year, and to the best of the Department's knowledge is the result of the Department or Minnesota electric utilities reaching out to IEEE to request utility-size based results the last two years. It is the Department's understanding that the Company does not intend to utilize its Alternate Method in this case or in the future—the intent was to fill a gap, and meet the Commission's supplemental comment period, while awaiting the IEEE reporting by utility size.

The Department believes this exercise was productive for the Company, as the same reliability performance deficiencies identified by the IEEE benchmarks were also identified utilizing the Company's Alternate Method, although the benchmarks varied slightly. The Department created table below summarizes the comparison between Xcel's reliability performance, Xcel's Alternate Method benchmarks, and the IEEE benchmarks per work center and across all of Xcel's Minnesota customers.

---

<sup>23</sup> *IEEE Distribution Reliability Working Group - Benchmarking*. IEEE (last visited November 13, 2025). Available at: <https://cmte.ieee.org/pes-drwg/benchmarking/>.

**Table 3 – Reliability Performance vs. Commission-designated IEEE Benchmark vs. Xcel Alternate Method**

Work Center	Metric	IEEE Benchmark	Alternate Method Benchmark	Xcel Performance	Met Benchmark?
Metro-East	SAIDI	120	126	115.5	Yes
	SAIFI	1.01	0.98	1.08	No
	CAIDI	118	123	107.15	Yes
Metro-West	SAIDI	120	126	101.37	Yes
	SAIFI	1.01	0.98	1.14	No
	CAIDI	118	123	88.58	Yes
Northwest	SAIDI	150	144	122.44	Yes
	SAIFI	1.15	1.09	0.92	Yes
	CAIDI	128	126	132.86	No
Southeast	SAIDI	150	144	121.49	Yes
	SAIFI	1.15	1.09	0.92	Yes
	CAIDI	128	126	131.52	No
All Minnesota Customers	SAIDI	120	126	110.04	Yes
	SAIFI	1.01	0.98	1.08	No
	CAIDI	118	123	101.95	Yes

In its Supplemental Addendum eliminating its Alternate Method, the Company states:

Given the IEEE benchmarking results for 2024, we will continue to use the applicable benchmarking standards for each work center. We support standards at the second quartile of the IEEE benchmark for large utilities for our Metro East and Metro West work centers, and at the second quartile of the IEEE benchmark for medium utilities for our Northwest and Southeast work centers.<sup>24</sup>

As the Company is not proposing to move forward with its Alternate Method, the Department does not have a recommendation on the method at this time.

**C. CORRECTIONS TO DEPARTMENT COMMENTS REGARDING CALL RESPONSE TIME METRIC TABLES FOR 2023 AND 2024**

Commission staff emailed the Department with questions regarding the IVR call estimates in the call center metric summaries for 2022, 2023 and 2024 on September 16, 2025. Specifically, Commission Staff asked why the number of IVR calls in Xcel’s filing was different from the number of IVR calls in

<sup>24</sup> 2024 Xcel SRSQ Supplemental – Addendum, at 9.

2024 in the Department comments and that the Department’s 2023 comments also contained inconsistent information.<sup>25</sup>

The Department revisited its call center response times calculations for both 2023 and 2024 to determine an explanation for the inconsistency Commission Staff identified. The errors that resulted in the inconsistency were obvious and the Department notified and thanked Commission Staff in an email the following day for identifying the errors and provided an explanation of the effects of the corrections on Xcel’s call center response calculation.

Table 2 identifies the errors in the 2023 and 2024 Department’s comments as well as the corrected figures.

**Table 2 – Summary of Corrections to Interactive-Voice-Response (IVR) Annual Call Volumes for Tables included in Department’s Comments in 2023 and 2024 Xcel Service Reliability and Quality Dockets**

Line No.	Year	2022	2023 - Filed	2023 - Corrected	2024 - Filed	2024 - Corrected
	<b>Category</b>	<b>Calls Offered to Agents</b>	<b>Calls - Agents</b>	<b>Calls - Agents</b>	<b>Calls - Agents</b>	<b>Calls - Agents</b>
1.	Residential	891,062	830,902	830,902	831,994	831,994
2.	BSC	56,525	54,029	54,029	54,019	54,019
3.	Credit	144,695	271,202	271,202	287,075	287,075
4.	PAR	24,715	43,812	43,812	48,930	48,930
5.	Total	1,116,997	1,199,945	1,199,945	1,222,018	1,222,018
	<b>Category</b>	<b>Calls Handled by IVR</b>	<b>Calls - IVR</b>	<b>Calls - IVR</b>	<b>Calls - IVR</b>	<b>Calls - IVR</b>
6.	Non-billing Non-outage	313,304	401,062	401,062	669,088	669,088
7.	Billing	1,264,854	1,244,194	1,244,194	1,362,568	1,362,568
8.	Outage	282,137	<b>266,586</b>	<b>266,586</b>	<b>414,042</b>	<b>199,294</b>
9.	Total	1,546,991	1,510,780	1,510,780	1,776,610	1,561,862
	<b>Category</b>	<b>Outage calls</b>	<b>Outage calls</b>	<b>Outage calls</b>	<b>Outage calls</b>	<b>Outage calls</b>
10.	Agents	168,888	174,110	174,110	214,748	214,748
11.	IVR	282,137	<b>266,856</b>	<b>266,586</b>	<b>199,294</b>	199,294
12.	Total	451,025	440,966	440,696	414,042	414,042
	<b>Xcel</b>	<b>All calls</b>	<b>All calls</b>	<b>All calls</b>	<b>All calls</b>	<b>All calls</b>
13.	Lines 5+8	1,399,134	1,466,531	1,466,531	1,636,060	1,421,312
14.	Lines 5+7+11	2,663,988	2,710,995	2,710,725	2,783,880	2,783,880
	<b>DER</b>	<b>All calls</b>	<b>All calls</b>	<b>All calls</b>	<b>All calls</b>	<b>All calls</b>
15.	Lines 5+6+8+12	3,146,180	3,286,167	3,285,897	3,667,716	3,667,716

Going from left to right in Table 1, the Department reversed the digits for the number of IVR calls in 2023 at lines 8 (266,586) and 11 (266,856) in the 2023- Filed column. The 2023- Corrected column

<sup>25</sup> See Attachment DOC-1-SCA

corrects that error. In 2024, the Department incorrectly included the total number of outage calls handled by IVR at line 12 (414,042) in line 8 – the number of outage calls handled by IVR. The 2024-Corrected column identifies the correct figure of the number of outage calls handled by IVR (199,294) at line 11, which is consistent with the number of outage calls handled by IVR (line 8).

The effects of the correction to the 2023 data resulted in 270 fewer calls for both Xcel and the Department’s number of calls at lines 14 and 15. That difference did not affect the percentage of calls answered within 20 seconds for either entity for 2023. For 2024, the correction did not have any effect on either Xcel or the Department’s total number of calls. So, the change did not affect those results either. Given that the correction did not result in material changes, the Department recommends the Commission accept and incorporate this corrected information in its analysis and decision-making.

#### **IV. DEPARTMENT RECOMMENDATIONS**

Based on analysis of Xcel’s supplemental filings and the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

*A. COMPARISON OF XCEL’S 2024 RELIABILITY METRICS AND 2024 IEEE DRWG BENCHMARKING RESULTS*

The Department recommends the Commission accept the information the Company submitted regarding the IEEE 2024 Reliability Benchmarking analysis and that the Commission adopt Xcel’s proposed 2025 reliability goals.

*B. CORRECTIONS TO DEPARTMENT COMMENTS REGARDING CALL RESPONSE TIME METRIC TABLES FOR 2023 AND 2024*

The Department recommends the Commission accept and incorporate this corrected information in its analysis and decision-making.

## Attachments

**From:** [Nikitas, Sophie \(She/Her/Hers\) \(PUC\)](#)  
**To:** [Kundert, John \(COMM\)](#)  
**Cc:** [Wiedewitsch, Rachel \(She/Her/Hers\) \(COMM\)](#)  
**Subject:** RE: Quick clarification on 25-27 initial comments SRSQ data  
**Date:** Tuesday, November 25, 2025 1:32:37 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)

---

Sounds good, thanks!

**Sophie Nikitas**

Rates Analyst | Economic Analysis Unit

Pronouns: She/Her

**Minnesota Public Utilities Commission**

121 7th Place E, Suite 350

Saint Paul, MN 55101-2147

E: [sophie.nikitas@state.mn.us](mailto:sophie.nikitas@state.mn.us)

P: 651-539-1062

[mn.gov/puc](http://mn.gov/puc)

---

**From:** Kundert, John (COMM) <[john.kundert@state.mn.us](mailto:john.kundert@state.mn.us)>  
**Sent:** Tuesday, November 25, 2025 12:48 PM  
**To:** Nikitas, Sophie (She/Her/Hers) (PUC) <[sophie.nikitas@state.mn.us](mailto:sophie.nikitas@state.mn.us)>  
**Cc:** Wiedewitsch, Rachel (She/Her/Hers) (COMM) <[Rachel.Wiedewitsch@state.mn.us](mailto:Rachel.Wiedewitsch@state.mn.us)>  
**Subject:** RE: Quick clarification on 25-27 initial comments SRSQ data

Hi Sophie –

I don't think I included that correction in our November 6<sup>th</sup> comments.. But thanks to this email, I will be include the correction in our supplemental comments on December 15<sup>th</sup>.

Thanks for the reminder.

John Kundert

Financial Analyst

651-539-1740

[mn.gov/commerce](http://mn.gov/commerce)

Minnesota Department of Commerce

85 7th Place East, Suite 280 | Saint Paul, MN 55101



**CONFIDENTIALITY NOTICE:** This message is intended only for the use of the individual(s) named above. Information in this e-mail or any attachment may be confidential or otherwise protected from disclosure by state or federal law. Any unauthorized use, dissemination, or copying of this message is prohibited. If you are not the intended recipient, please refrain from reading this e-mail or any attachments and notify the sender immediately. Please destroy all copies of this communication.

---

**From:** Nikitas, Sophie (She/Her/Hers) (PUC) <[sophie.nikitas@state.mn.us](mailto:sophie.nikitas@state.mn.us)>  
**Sent:** Tuesday, November 25, 2025 11:20 AM  
**To:** Kundert, John (COMM) <[john.kundert@state.mn.us](mailto:john.kundert@state.mn.us)>  
**Subject:** RE: Quick clarification on 25-27 initial comments SRSQ data

Hi John, did these corrections make it into comments you've already filed, or will they be in the next round? Please let me know if I missed it!

**Sophie Nikitas**

Rates Analyst | Economic Analysis Unit

[Pronouns:](#) She/Her

**Minnesota Public Utilities Commission**

121 7th Place E, Suite 350

Saint Paul, MN 55101-2147

E: [sophie.nikitas@state.mn.us](mailto:sophie.nikitas@state.mn.us)

P: 651-539-1062

[mn.gov/puc](http://mn.gov/puc)

---

**From:** Kundert, John (COMM) <[john.kundert@state.mn.us](mailto:john.kundert@state.mn.us)>  
**Sent:** Wednesday, September 17, 2025 2:19 PM  
**To:** Nikitas, Sophie (She/Her/Hers) (PUC) <[sophie.nikitas@state.mn.us](mailto:sophie.nikitas@state.mn.us)>; Wiedewitsch, Rachel (She/Her/Hers) (COMM) <[Rachel.Wiedewitsch@state.mn.us](mailto:Rachel.Wiedewitsch@state.mn.us)>  
**Cc:** McShane, Sally Anne (PUC) <[sally.anne.mcshane@state.mn.us](mailto:sally.anne.mcshane@state.mn.us)>; Campbell, Nancy (COMM) <[nancy.campbell@state.mn.us](mailto:nancy.campbell@state.mn.us)>  
**Subject:** RE: Quick clarification on 25-27 initial comments SRSQ data

Hi Sophie –

Thanks for bearing with me yesterday. That was one tough day.

As for your question, I think you have identified two errors in the Department's

comments in dockets 23-73 and 24-27. Taking a closer look at the Department’s spreadsheet and the source data from Xcel it looks like I included the wrong number in the table – the 24-27 comments. It should have been 199,294 as you correctly identified, not 414,042. In addition, the Total amount on Line 9 under Calls-IVR should be 1,561,862. Fortunately, line total on line 8 of the Table doesn’t contribute to the Department’s calculation of the total number of calls, so the amount on line 15 wasn’t affected. See Revised Table 8 – 2024 below.

**Revised - Table 8**

<b>2024</b>				
<b>Line No.</b>	<b>Category</b>	<b>Calls - Agents</b>	<b>Answered.&lt; 20 Sec.</b>	<b>%</b>
1.	Residential	831,994	351,301	42.22%
2.	BSC	54,019	28,251	52.30%
3.	Credit	287,075	112,434	39.17%
4.	PAR	48,930	28,983	59.23%
5.	Total	1,222,018	520,969	42.63%
		<b>Calls - IVR</b>	<b>Answered.&lt; 20 Sec.</b>	<b>%</b>
6.	Nonbilling Nonoutage	669,088	669,088	100.00%
7.	Billing	1,362,568	1,362,568	100.00%
8.	Outage	199,294	199,294	100.00%
9.	Total	1,561,862	1,561,862	100.00%
		<b>Outage calls</b>	<b>Answered.&lt; 20 Sec.</b>	<b>%</b>
10.	Agents	214,748	91,551	42.63%
11.	IVR	199,294	199,294	100.00%
12.	Total	414,042	290,845	70.25%
	<b>Xcel</b>	<b>All calls</b>	<b>Answered.&lt; 20 Sec.</b>	<b>%</b>

13.	Line 5 + Line 8	1,421,312	720,263	50.68%
14.	Line 5 + Line 7 + Line 11	2,783,880	2,082,831	74.82%
	<b>Department</b>	<b>All calls</b>	<b>Answered.&lt; 20 Sec.</b>	<b>%</b>
15.	Line 5 + Line 6 + Line 8 + Line 12	3,667,716	2,843,470	77.53%

I also made a mistake in the same table in the 2023 SRSQ, although not the same one as in 2024. In 2023 it appears I fat-fingered the IVR outage calls on line 11. The correct number of outage calls handled by IVR was 266,586, not 255,586. That error did affect the Departments estimate of the total number of all calls. The correct figure is 3,285,897, not 3,274,897. See the Corrected 2023 table below.

2023				
Line No.	Category	Calls - Agents	Answered within 20	%
1.	Residential	830,902	473,517	56.99%
2.	BSC	54,029	33,139	61.34%
3.	Credit	271,202	214,766	79.19%
4.	PAR	43,812	19,700	44.96%
5.	Total	1,199,945	741,122	61.76%
		<b>Calls - IVR</b>	<b>Answered within 20</b>	<b>%</b>
6.	Nonbilling/Nonoutage	401,062	401,062	100.00%
7.	Billing	1,244,194	1,244,194	100.00%
8.	Outage	266,586	266,586	100.00%
9.	Total	1,510,780	1,510,780	100.00%
		<b>Outage calls</b>	<b>Answered within 20</b>	<b>%</b>
10.	Agents	174,110	107,536	61.76%
11.	IVR	266,856	266,856	100.00%
12.	Total	440,966	374,392	84.90%
	<b>Xcel</b>	<b>All calls</b>	<b>Answered within 20</b>	<b>%</b>
13.	Line 5 + Line 8 Line 5 + Line 7 +	1,466,531	1,007,978	68.73%

14.	Line 11	2,710,995	2,251,902	83.07%
	<b>Department</b>	<b>All calls</b>	<b>Answered within 20</b>	<b>percent</b>
15.	Line 5 + Line 6 + Line 8 + Line 12	3,286,167	2,760,770	84.01%

Thanks for checking with me on this question and identifying the error. We will correct it in our supplemental comments and make sure it doesn't happen next year.

John Kundert

Financial Analyst

651-539-1740

[mn.gov/commerce](http://mn.gov/commerce)

Minnesota Department of Commerce

85 7th Place East, Suite 280 | Saint Paul, MN 55101



**CONFIDENTIALITY NOTICE:** This message is intended only for the use of the individual(s) named above. Information in this e-mail or any attachment may be confidential or otherwise protected from disclosure by state or federal law. Any unauthorized use, dissemination, or copying of this message is prohibited. If you are not the intended recipient, please refrain from reading this e-mail or any attachments and notify the sender immediately. Please destroy all copies of this communication.

---

**From:** Nikitas, Sophie (She/Her/Hers) (PUC) <[sophie.nikitas@state.mn.us](mailto:sophie.nikitas@state.mn.us)>

**Sent:** Tuesday, September 16, 2025 11:04 AM

**To:** Kundert, John (COMM) <[john.kundert@state.mn.us](mailto:john.kundert@state.mn.us)>; Wiedewitsch, Rachel (She/Her/Hers) (COMM) <[Rachel.Wiedewitsch@state.mn.us](mailto:Rachel.Wiedewitsch@state.mn.us)>

**Cc:** McShane, Sally Anne (PUC) <[sally.anne.mcshane@state.mn.us](mailto:sally.anne.mcshane@state.mn.us)>

**Subject:** Quick clarification on 25-27 initial comments SRSQ data

Hi folks,

We're working on briefing papers for 25-27 and I had a quick clarification about your data on Call Center Response Times (page 40).

I noticed that the totals for IVR outage calls seem to be different in different sections. Could you explain why that is? The 199k number is what I see in Xcel's attachment F.

Line No.	Category	Calls - Agents	Answered.< 20 Sec.	%
1.	Residential	831,994	351,301	42.22%
2.	BSC	54,019	28,251	52.30%
3.	Credit	287,075	112,434	39.17%
4.	PAR	48,930	28,983	59.23%
5.	Total	1,222,018	520,969	42.63%
		<b>Calls - IVR</b>	<b>Answered.&lt; 20 Sec.</b>	<b>%</b>
6.	Nonbilling Nonoutage	669,088	669,088	100.00%
7.	Billing	1,362,568	1,362,568	100.00%
8.	Outage	414,042	414,042	100.00%
9.	Total	1,776,610	1,776,610	100.00%
		<b>Outage calls</b>	<b>Answered.&lt; 20 Sec.</b>	<b>%</b>
10.	Agents	214,748	91,551	42.63%
11.	IVR	199,294	199,294	100.00%
12.	Total	414,042	290,845	70.25%
	<b>Xcel</b>	<b>All calls</b>	<b>Answered.&lt; 20 Sec.</b>	<b>%</b>
13.	Line 5 + Line 8	1,636,060	720,263	44.02%
14.	Line 5 + Line 7 + Line 11	2,783,880	2,297,579	82.53%
	<b>Department</b>	<b>All calls</b>	<b>Answered.&lt; 20 Sec.</b>	<b>%</b>
15.	Line 5 + Line 6 + Line 8 + Line 12	3,667,716	2,843,470	77.53%

I also see there is a difference in last year's filing:

**Table 8 – Call Center Response Summary for 2023**

2023				
Line No.	Category	Calls - Agents	Answered within 20	%
1.	Residential	830,902	473,517	56.99%
2.	BSC	54,029	33,139	61.34%
3.	Credit	271,202	214,766	79.19%
4.	PAR	43,812	19,700	44.96%
5.	Total	1,199,945	741,122	61.76%
		<b>Calls - IVR</b>	<b>Answered within 20</b>	<b>%</b>
6.	Nonbilling/Nonoutage	401,062	401,062	100.00%
7.	Billing	1,244,194	1,244,194	100.00%
8.	Outage	266,586	266,586	100.00%
9.	Total	1,510,780	1,510,780	100.00%
		<b>Outage calls</b>	<b>Answered within 20</b>	<b>%</b>
10.	Agents	174,110	107,536	61.76%
11.	IVR	255,586	255,586	100.00%
12.	Total	429,696	363,122	84.51%
	<b>Xcel</b>	<b>All calls</b>	<b>Answered within 20</b>	<b>%</b>
13.	Line 5 + Line 8	1,466,531	996,708	67.96%
14.	Line 5 + Line 7 + Line 11	2,699,725	2,251,902	83.41%
	<b>Department</b>	<b>All calls</b>	<b>Answered within 20</b>	<b>percent</b>
15.	Line 5 + Line 6 + Line 8 + Line 12	3,274,897	2,749,500	83.96%

This is my first year working on this docket, so feel free to share any context I may have missed from previous years!

Best,

Sophie

**Sophie Nikitas**

Rates Analyst | Economic Analysis Unit

[Pronouns](#): She/Her

**Minnesota Public Utilities Commission**

121 7th Place E, Suite 350

Saint Paul, MN 55101-2147

E: [sophie.nikitas@state.mn.us](mailto:sophie.nikitas@state.mn.us)

P: 651-539-1062

[mn.gov/puc](http://mn.gov/puc)

## **CERTIFICATE OF SERVICE**

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

**Minnesota Department of Commerce  
Supplemental Comments**

**Docket No. E002/M-25-27**

Dated this 15<sup>th</sup> day of **December 2025**

**/s/Sharon Ferguson**

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Marisa	Bayer	mbayer@edinamn.gov	City of Edina		4801 W 50th St Edina MN, 55424 United States	Electronic Service		No	Official 25-27
2	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-27
3	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	Official 25-27
4	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-27
5	Olivia	Carroll	oliviac@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St W1360 St. Paul MN, 55101 United States	Electronic Service		No	Official 25-27
6	Gabriel	Chan	gabechan@umn.edu			130 Hubert H. Humphrey Center 301 19th Ave S Minneapolis MN, 55455 United States	Electronic Service		No	Official 25-27
7	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	Official 25-27
8	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-27
9	Riley	Conlin	riley.conlin@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall, 401 8th Floor Minneapolis MN, 55401 United States	Electronic Service		No	Official 25-27
10	Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 St. Paul MN, 55101 United States	Electronic Service		No	Official 25-27
11	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	Official 25-27
12	Christopher	Droske	christopher.droske@minneapolismn.gov	Northern States Power Company dba Xcel Energy-Elec		661 5th Ave N Minneapolis MN, 55405 United States	Electronic Service		No	Official 25-27
13	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-	Electronic Service		No	Official 25-27

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Reliance Minneapolis MN, 55406 United States				
14	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101- 2198 United States	Electronic Service		No	Official 25-27
15	Shubha	Harris	shubha.m.harris@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401 - FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	Official 25-27
16	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	Official 25-27
17	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	Official 25-27
18	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	Official 25-27
19	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
20	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
21	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	Official 25-27
22	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
23	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	Official 25-27
24	Annie	Levenson Falk	annief@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	Official 25-27
25	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	Official 25-27

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
26	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	Official 25-27
27	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	Official 25-27
28	Tony	Mendoza	tony.mendoza@sierraclub.org	Sierra Club Environmental Law Program		2101 Webster St. 13th Floor Oakland CA, 94612 United States	Electronic Service		No	Official 25-27
29	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	Official 25-27
30	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	Official 25-27
31	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
32	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	Official 25-27
33	Scott	Neal	sneal@edinamn.gov	City of Edina		4801 W 50th St Edina MN, 55424 United States	Electronic Service		No	Official 25-27
34	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
35	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	Official 25-27
36	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	Official 25-27
37	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	Official 25-27
38	George	Shardlow	george@energycents.org	Energy CENTS Coalition		823 E. 7th Street Saint Paul MN, 55106 United States	Electronic Service		No	Official 25-27

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
39	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	Official 25-27
40	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
41	Lauren	Steinhaeuser	lauren.steinhaeuser@xcelenergy.com	Northern States Power Company dba Xcel Energy		414 Nicollet Mall, 401-08 Minneapolis MN, 55401 United States	Electronic Service		No	Official 25-27
42	Carla	Vita	carla.vita@state.mn.us	MN DEED		Great Northern Building 12th Floor 180 East Fifth Street St. Paul MN, 55101 United States	Electronic Service		No	Official 25-27
43	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
44	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	Official 25-27
45	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27