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July 1, 2020

William Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101

RE: Docket Nos. CI-02-2034/M-12-383 In the Matter of the Request for Commission Finding Regarding the Customer Complaint Performance Service Quality Plan

Dear Mr. Seuffert:

The City of Minneapolis ("Minneapolis") thanks the Commission for the opportunity to provide comments regarding Xcel Energy's ("Xcel" or "the Company") request to omit 129 customer complaints filed with the Commission's Consumer Affairs Office in 2019 from consideration as part of the Company's Quality of Service Plan ("QSP") evaluation.

The City of Minneapolis understands that nearly two dozen of the customer complaints that Xcel petitioned be excluded originated with Minneapolis residents who completed solar interconnection applications. A customer's decision to invest in solar supports Minneapolis clean energy goals, including the 100% renewable electricity goal by 2030¹ and the 10% local generation goal by 2025². We rely on our exclusive electric utility, Xcel Energy, to assist our community in achieving these goals as we cannot do so alone.

Topic(s) Open for Comment:

• Should the Commission grant Xcel Energy's request that 129 individual interconnection application complaints from one solar installer not be considered "customer complaints", and not be included in the customer complaints metric in the Company's Quality of Service Plan (QSP) tariff, as requested by Xcel?

No, the Commission should not grant Xcel's request to exclude 129 individual interconnection application complaints. Minneapolis cites two resources for the Commission's consideration.

1. Per the Commission's website, "the Public Utilities Commission's Consumer Affairs Office (CAO) helps resolve disputes between customers and utility companies."³

http://www2.minneapolismn.gov/www/groups/public/@citycoordinator/documents/webcontent/wcms1p-113598.pdf

¹ Resolution adopting 100% renewable electricity community-wide by 2030.

https://lims.minneapolismn.gov/Download/RCA/4338/100%20renewables%20resolution%20final.pdf

² Minneapolis Climate Action Plan. June 28, 2013.

³ MN Public Utilities Commission "File a complaint" page. https://mn.gov/puc/consumers/help/complaint/ Accessed June 20, 2020.

2. The Regulatory Assistance Project (RAP) defines Service Quality Index as:

Service Quality Index: SQI

A service quality index is a mechanism established by the regulator to measure the quality of electricity service, including such factors as the frequency and duration of outages, the time required to respond to a customer inquiry, the number of regulatory complaints received, and the response time to safety-related calls. The regulator may impose a financial penalty on utilities not meeting defined goals, or may tie a portion of the allowed return to service performance.4 (emphasis added)

Neither resource suggests that complaints from customers who are solar applicants be treated differently than other customer complaints. The MN Department of Commerce (Department) coordinated with Commission staff about how customers with interconnection issues could be assisted, and the agreed upon process included Department staff referring customers with solar interconnection complaints to the CAO for support with resolving issues.⁵

Minneapolis emphasizes that all utility customers (including someone authorized to act on behalf of the customer with the customer's permission) must have access to impartial support when experiencing problems with any aspect of their service that they are unable to resolve by working directly with the utility. Minneapolis qualifies this statement with two criteria:

- 1) The customer was aware that their contracted solar installer was filing a complaint on their behalf and supported this action
- 2) CAO accepted the complaint as filed, or if CAO had requests to clarify the legitimacy of a complaint, the complainant was responsive to these requests.

The CAO plays a critical role as the state's most accessible resource for customers needing assistance with utility issues and helps balance the fact that customers cannot choose an alternative electricity provider if they are dissatisfied. The primary leverage a customer has with their utility is having access to the state's approved customer complaint process. Therefore, legitimate complaints must not be dismissed when determining eligibility for a financial incentive or penalty.

 Should complaints from solar installers be tracked, not as "customer complaints" for QSP purposes, but instead, in a separate tracking mechanism?

It is important to treat all customers fairly. A separate tracking mechanism would remove the utility's incentive to work expediently to resolve interconnection issues, and this would lead to discriminatory treatment of customers interested in solar.

The timelines and milestones established through the MN DIP stakeholder process provide clear performance requirements for both the utility and the interconnecting customer.⁶ These guidelines in combination with the CAO complaint process are important to fairly address the disparity between the customer's position and that of the monopoly utility service provider.

⁴ Lazar, J. (2016). Electricity Regulation in the US: A Guide. Second Edition. Montpelier, VT: The Regulatory Assistance Project. p. 197. Retrieved from http://www.raponline.org/knowledge-center/electricityregulation-in-the-us-a-guide-2.

⁵ Circa 2016 through interagency leadership and staff level collaboration.

⁶ Docket 16-521. Order Establishing Updated Interconnection Process and Standard Interconnection Agreement. Aug. 13, 2018.

• How should the definition of "customer" in Xcel's QSP tariff be interpreted?

Xcel's QSP Tariff includes the following definition of customer:

an electric or a natural gas customer that receives a bill for utility service from the Company or a representative of that customer. A representative includes an individual designated with Power of Attorney for the Customer, an attorney retained to represent the Customer, or an individual authorized by the Customer to act on his/her account.⁷

Minneapolis believes that customers applying to interconnect solar to the distribution grid are included in this definition and should be granted fair, non-discriminatory treatment.

• Are there other issues or concerns related to this matter?

In researching the issue of customer complaints about solar interconnection, City of Minneapolis reviewed the 2019 Annual Solar*Rewards report filed by Xcel on June 1, 2020.8 The compliance report includes attachment C that contains data on certain key milestones related to interconnection timelines for compliance with the Department's reporting requirements.

Unfortunately, valuable data is missing from Xcel's Solar*Rewards compliance filing for the 286 withdrawn solar projects in 2019. Specifically, **if an applicant withdrew**, **Xcel excludes dates for the Company's critical review milestones**, **such as "Date deemed complete"**, **"Date initial review complete"**, **"Date supplemental review complete"**, etc. Therefore, the otherwise thorough reporting for completed interconnection projects makes it difficult to evaluate whether the utility's review process was consistently timely and whether delays may have contributed to some customers' decisions to withdraw. A sample of the table from the report is included below for reference and a link provided in footnote 8.

PUBLIC DOCUMENT – TRADE SECRET DATA EXCISED PROTECTED DATA HIGHLIGHTED Docket No. E002/M-13-1015 2019 Solar*Rewards Annual Report Attachment C: 8 of 20

Docket E999/F Distributed En										y 1, 2019 - December Xcel Energy	Temporary Annual Reporting (Rate Regulated Utilities Only)																	
Distributed	Energy Res	ources	- 1													1					10							
Eg: S01-17, S- 02-17, W-01- 17 Do net lectude customer oxines or		Ex, Solar, Wind, Battery	If OHP, enter X	if storage is only charged by a DER generator (ex solar), mark "X	Active Application, Interconnected, Withdrawn, Decommissioned	City where facility is located	Zip Code where facility is located	Substation where facility is interconnected	Feeder where facility is interconnected	Residential, Commercial, Industrial, Littity, Community Solar Garden	Eg: S*Rewards, MSM, SolarSense. If none, order N/A	System cost before incontives or tax credits, N/A if not provided							in Progress, Pass, Fail		in Progress, Pass, Fail, n/a		in Progress, Pass, Fall, n/a		in Progress, Completed, n/a			Simplified, Fast Track, Study
DER Identifier	DER Capacity kW AC	DER Type	OP	Storage	DER Status	City	Zip Cade	Substation	Feeder	Customer Type	Incentive Program	Total Installed Cost without Incentives	Submitted	Year Interconnected	Year Decommissioned (if applicable)	Date of Application Submittal	Date Application Deamed Complete	Completed	Initial Review Disposition	Date Supplemental Review Completed	Supplemental Review Disposition	Date System Impact Study Completed	System Impact Study Disposition	Date Facilities Study Completed	Facilities Study Disposition	Date Interconnection Agreement Signed	Date Permission to Operate Granted	n Interconnection Process Track
CID3835281	9.84	Solar	- 0		Interconnected	Eden Prairie				Residential	Solar*Rewards		2019	2019	N/A	8/26/2019	8/26/2019	9/17/2019	pass		0/2		0/2		_	9/26/2019	11/9/2019	Simple
QID3835294	11.39	Setar	-	_	Active Application Interconnected	HASTINGS			-	Residential	Solar*Rewards		2019 2019	N/A 2019	N/A	Not Submitted 7/19/2019		8/17/2019	62	10/25/2019	0/2		0/2	_	_	**********		Simple
OID3835542 OID3835552	6.96 7.62	Solar Solar		_	Interconnected	Saint Paul SHOKEVIEW				Residential Residential	Solar*Rewards Solar*Rewards		2019	2019	N/A N/A	7/24/2019	7/19/2019 7/24/2019	8/5/2019	pass	10/25/2019	pass n/a		0/2	_	_	11/18/2019 9/23/2019	11/26/2019	Simple Simple
0103835557	6.00	Selar	- 6		Intermanented	New Brighton				Residential	Solar*Rewards		2019	2019	N/A	7/24/2019	7/24/2019	7/30/2019	Date		6/2	_	0/2	_	-	9/9/2019	10/4/2019	Smale
CID3835562		Solar	- 3		Withdrawn	LAKEVILLE				Residential	Solar*Rewards		2019	N/A	N/A	Withdrawn	1,000				0/2		0/2					1/2
0103835563	7.62	Sclar			Interconnected	Dundas				Residential	Solar*Rewards		2019	2019	N/A	8/11/2019	8/13/2019	8/25/2019	pass		11/2		n/a			8/28/2019	10/9/2019	Smgle
CID3835566	7.62	Solar	- 83		Interconnected	Lakeville				Residential	Solar*Rewards	0	2019	2019	N/A	8/14/2019	8/14/2019	8/21/2019	pass	ä	0/2		n/a			10/4/2019	10/25/2019	Simple
O(D3835568 O(D3835602	6.00 3.48	Solar Solar	- 3		interconnected interconnected	Rosemount Roseville				Residential Residential	Solar*Rewards Solar*Rewards		2019	2019	N/A N/A	8/20/2019 10/16/2019	8/20/2019 10/16/2019	9/3/2019	5255 0255	2	nja nja		n/a n/a	_	-	9/5/2019	11/5/2019	Simple
OD3835615	7.83	Solar	- //	_	interconnected	Arrandale			_	Residential	Solar*Rewards		2019	2020	N/A N/A	10/16/2019	10/36/2019	11/15/2019	nass		0/3		0/2			12/9/2019	12/31/2019	Single
CID3835626	6.96	Solar			Active Application	Atturbase			HUG321	Residential	Solar*Rewards		2019	N/A	N/A	10/2/2019	10/2/2019	10/31/2019	tail	12/29/2019	Dass		104		_	12/3/2019	12/31/2019	Smale
OD3835647	2.61	Selar	- 9		Active Application				500,056	Recidental	Solar*Rewards		2019	N/A	N/A	9/9/2019	9/9/2019	10/8/2019	0255	14/49/4949	200		0/2					Single
0103835652		Solar	- 81		Active Application	Hector				Residential	Solar*Rewards		2019	N/A	N/A	Not Submitted			1		n/a		0/2					
0103835653	11.39	Solar			Withdrawn	Hector				Residential	Solar*Rewards	1	2019	N/A	N/A	Withdrawn				V	1/2		0/2					Single
0103835666	7.62	Solar	- 8		Interconnected	Arten Hils				Residential	Solar*Rewards		2019	2019	N/A	9/3/2019	9/3/2019	9/17/2019	pass	1	0/2		n/a			9/30/2019	12/4/2019	Smale
CID3835667	-	Solar	- 8		Active Application	Arden Hills				Residential	Solar*Rewards		2019	N/A	N/A	Not Submitted				6	0/2		0/2					
CID3835669 CID3835687	11.39	Solar	- 6		Withdrawn Withdrawn	Hector Hector				Business	Solar*Rewards		2019	N/A N/A	N/A N/A	Withdrawn		_	_	8	0/2		n/a n/a				8	Simple
CID1835693	3.75	Setar	- 6	_	Interconnected	Shoreview		_	_	Residential	Solar*Rewards		2019	2019	N/A	9/16/2019	9/16/2019	9/20/2019	pass	ě.	0/3		0/2			9/26/2019	11/18/2019	Simple
0103835702	5.22	Solar			Interconnected	Mankato				Residential	Solar*Rewards		2019	2019	N/A	7/16/2019	7/16/2019	7/22/2019	0255	9	1/2		0/2			9/12/2019	9/27/2019	Smale
OID3835707	11.39	Solar	- 8		Interconnected	MINNEAPOLIS				Residential	Solar*Rewards		2019	2019	N/A	8/26/2019	8/25/2019	8/29/2019	0965	8	6/8		0/2			9/16/2019	10/23/2019	Smale
CID3835714	7.62	Solar	- 2		Interconnected	Plymouth				Residential	Solar*Rewards	0	2019	2019	N/A	7/8/2019	7/8/2019	7/22/2009	22560	0	0/2		0/2			9/5/2019	9/24/2019	Simple
CID3835873	9.28	Solar			interconnected	Plymouth				Residential	Solar*Rewards		2019	2019	N/A	9/5/2019	9/5/2019	9/24/2015		1	0/2		0/2			10/2/2019	11/20/2019	Single
CID3R35874	3.75	Solar	-	_	Interconnected	St Paul				Residential	Solar*Rewards		2019	2019	N/A	7/1/2019	7/1/2019	7/22/2019	pass		1/4		n/a			8/26/2019	9/24/2019	Single
OID3835882 OID3835884	7.62 A.35	Selar Selar	- 8	_	Interconnected	Stilwater				Residential	Solar*Rewards		2019	2019	N/A N/A	6/20/2019 8/12/2019	8/12/2019	7/20/2019	pass		n/a		0/2	_	-	8/15/2019	12/20/2019	Simple
0103836006	15.23	Solar	-	_	Active Application	Shoreview			WA7081	Residential Residential	Solar*Rewards Solar*Rewards		2019	N/A	N/A	7/19/2019	7/19/2019	8/1//2019	pass fail	9/4/2019	n/a pass		0/2	_	In progress	9/5/2019	14/3/2019	Simple
OID3836007	4.35	Solar	- 20		WithGrawn	Minneapolis			MATERIAL STREET	Residential	Solar*Rewards		2019	N/A	N/A	7/8/2019	7/8/2019	7/22/2019	pass	0) 4(2027	0/2		6/9		in progress	14/1/10/20		Simple
CID3836009	12.00	Solar			Interconnected	Woodbury				Residential	Solar*Rewards		2019	2019	N/A	9/11/2019	9/11/2019	9/11/2019	086		1/4		0/2			9/26/2019	11/7/2019	Smale
CID3836020	4.80	Sclar	9		Active Application	MINNEAPOUS				Residential	Solar*Rewards		2019	N/A	N/A	Not Submitted			1 22		11/3		0/2					Simple
0101836012	6.00	Solar			Interconnected	ST PAUL				Residential	Solar*Rewards	10	2019	2019	N/A	8/23/2019	8/23/2019	9/6/2019	pass	9	n/a		0/2			9/26/2019	30/14/2019	Simple
0103836013	5.00	Selar	- 0		Interconnected	St. Paul				Residential	Solar*Rewards		2019	2019	N/A	8/20/2019	8/20/2019	9/18/2019	pass	3	0/2		0/2		_	9/30/2019	11/15/2019	Simple
OID3836016 OID3836018	9.99	Solar Solar	-		Interconnected	Minneapolis St. Louis Park				Residential Residential	Solar*Rewards Solar*Rewards		2019	2019	N/A N/A	8/27/2019 9/20/2019	8/27/2019 9/20/2019	9/16/2019	pass		n/a n/a		0/2			9/30/2019	11/1/2019	Simple
CID3836019	7.62	Solar	- 6		Intermanerad	Woodbury				Residential	Solar*Rewards		2019	2019	N/A	8/9/2019	8/9/2019	8/23/2019	pass	5	0/2	_	0/2		-	8/28/2019	9/25/2019	Single
CID3836020	6.09	Solar			interconnected	Mound				Residential	Solar*Rewards		2019	2019	N/A	7/19/2019	7/19/2019	7/24/2019	Date		6/2		0/2			8/26/2019	9/25/2019	Single
0103836021	11.39	Solar	- 5		Interconnected	Maglewood				Residential	Solar*Rewards	ě.	2019	2019	N/A	9/9/2019	9/9/2019	10/7/2019	pass	8	0/2		0/2			10/3/2019	17/4/2019	Simple
0103836022	6.00	Solar			Interconnected	St. Paul				Residential	Solar*Rewards		2019	2019	N/A	9/17/2019	9/17/2019	10/17/2019	pass		1/3		0/2			11/20/2019	12/5/2019	Simple
Q103836023	7.62	Solar	- 3		Active Application				NOF051	Residential	Solar*Rewards		2019	N/A	N/A	9/5/2019	9/6/2019	10/8/2019	bi	12/3/2019	pass		-	1/9/2020	Complete			Single
CID3836024	5.22	Solar			Withdrawn	MARINE SAINT CROIX				Residential	Solar*Rewards		2019	N/A	N/A	Withdraws					a/a		n/a					Simple
CID1836100	5.00	Solar			Interconnected	White Bear Lake				Residential	Solar*Rewards		2019	2019	N/A	8/13/2019	8/13/2019	8/21/2019	pass		0/4		0/4			9/5/2019	10/21/2019	Simple
CID3836114	5.22	Solar	- 8		Interconnected	Saint Paul				Residential	Solar*Rewards		2019	2020	N/A	8/2/2019	8/7/2019	12/5/2019	pass		11/3		n/a			10/7/2019		Single
0103836125	10.44	Solar	-		Active Application	WOODBURY				Residential	Solar*Rewards		2019	N/A	N/A	Not Submitted	a ma Day c	4007000	-		1/2		0/2			44000000	11 0000000	Single
CID3836139 CID3840338	5.00	Solar Solar	- 8	_	Interconnected Withdrawn	MINNEAPOLIS MOUNDS VEW				Residential Residential	Solar*Rewards Solar*Rewards		2019	2019 N/A	N/A N/A	9/18/2019 Withdrawn	9/18/2019	10/17/2019	pass		n/a		n/a n/a			10/23/2019	11/22/2019	Simple n/a
CID3840429	3.84	Solar	- 3		Withdrawn	MOUNDS VEW				Residential	Solar*Rewards		2019	N/A	N/A	Withdrawn	1	_	1		0/2		0/2			1	1	Smale
CID1840580	4.32	Solar			Withdrawn	MINNEAPOLIS				Residential	Solar*Rewards	6	2019	N/A	N/A	8/2/2019	8/2/2019	9/11/2019	2150	8	0/4		0/2				18	Simple
OID3840587	4.06	Solar	- 8		Active Application	St. Cloud				Residential	Solar*Rewards		2019	N/A	N/A	Not Submitted		1	1		0/2		n/a				1	Simple

⁷ QSP Tariff, Xcel Energy Rate Book, Section 6, Sheet 7.2.

⁸ Xcel Annual Solar*Rewards Compliance Report. Jun 1, 2020.

Finally, we stand by the customer's right to have a favorable interconnection experience as envisioned by the MN DIP process, and we want solar developers who perform work in the city to be able to count on a predictable streamlined process. The CAO complaint process and the QSP evaluation process are important consumer protection tools.

The City of Minneapolis appreciates the opportunity offer input on this important topic that impacts the equitable treatment of Xcel's customers. Thank you for your consideration.

Sincerely,

Mr. Kim W. Havey, LEED AP, AICP

Division of Sustainability

K.W. Havg

STATE OF MINNESOTA)
) ss.	CERTIFICATE OF SERVICE
COUNTY OF HENNEPIN)

I, Kim W. Havey, of the City of Minneapolis, County of Hennepin, State of Minnesota, affirm that on the first day of July 2020, I served a copy of the following via e-mail and/or via U.S. Mail:

Comments of the City of Minneapolis regarding Docket Nos. 12-383

at the last known mailing addresses and email addresses of said entities/individuals on the attached Service List. If by U.S. Mail, I placed said document in postage prepaid envelope and placed same in the U.S. Post Office in Minneapolis, Minnesota for delivery by the United States Postal Service.

K.W. Havg

Kim W. Havey

Electronic Service Members (Docket 12-383)

Electronic del vice Members (Docket 12-303)										
Last Name	First Name	Email	Company Name	Delivery Method	View Trad e Secr et					
Commerce Attorneys	Generic Notice	commerce.attorneys@ag.state. mn.us	Office of the Attorney General-DOC	Electronic Service	Yes					
Ferguson	Sharon	sharon.ferguson@state.mn.us	Department of Commerce	Electronic Service	No					
Johnson	Craig	cjohnson@Imc.org	League of Minnesota Cities	Electronic Service	No					
Moratzka	Andrew	andrew.moratzka@stoel.com	Stoel Rives LLP	Electronic Service	No					
Residential Utilities Division	Generic Notice	residential.utilities@ag.state.mn .us	Office of the Attorney General-RUD	Electronic Service	Yes					
Savelkoul	Richard	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	Electronic Service	No					
Seuffert	Will	Will.Seuffert@state.mn.us	Public Utilities Commission	Electronic Service	Yes					
Strommen	James M	jstrommen@kennedy- graven.com	Kennedy & Graven, Chartered	Electronic Service	No					
Sweet	Lynnette	Regulatory.records@xcelenerg y.com	Xcel Energy	Electronic Service	No					

Electronic Service Members (Docket 02-2034)

Last Name	First Name	Email	Company Name	Delivery Method	View Trad e Secr et
Anderson	Christopher	canderson@allete.com	Minnesota Power	Electronic Service	No
Commerce Attorneys	Generic Notice	commerce.attorneys@ag.state. mn.us	Office of the Attorney General-DOC	Electronic Service	Yes
Ferguson	Sharon	sharon.ferguson@state.mn.us	Department of Commerce	Electronic Service	Yes
Medhaug	Susan	Susan.medhaug@state.mn.us	Department of Commerce	Electronic Service	No
Residential Utilities Division	Generic Notice	residential.utilities@ag.state.mn .us	Office of the Attorney General-RUD	Electronic Service	Yes
Seuffert	Will	Will.Seuffert@state.mn.us	Public Utilities Commission	Electronic Service	Yes
Strommen	James M	jstrommen@kennedy- graven.com	Kennedy & Graven, Chartered	Electronic Service	No
Sweet	Lynnette	Regulatory.records@xcelenerg y.com	Xcel Energy	Electronic Service	No
Winegarden	Rebecca S.	beckwine@msn.com	Unknown	Electronic Service	No