

Staff Briefing Papers: Volume 2: Service Quality and Reporting

Meeting Date	Thursday, November 5, 2020	Agenda Item **5
Company	Northern States Power Company d/b/a Xcel Energy, Minnesota Power, and Otter Tail Power Company.	
Docket No.	E002/M-20-406 In the Matter of Xcel Energy's 2019 Annual Service Quality Performance Report and Proposed Reliability Measures E017/M-20-401 In the Matter of Otter Tail Power Company's 2019 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI, and CAIDI Reliability Standards for 2019 E015/M-20-404 In the Matter of Minnesota Power's 2019 Safety, Reliability and Service Quality Standards Report	
Issues	<ol style="list-style-type: none">1. Should the Commission accept the portion of the utilities' annual Safety, Reliability, and Service Quality reports for 2019 related to customer service quality?2. What action should the Commission take on utilities' proposed public facing summary of the annual reports?3. Should the Commission take any other action on the annual reports?	
Staff	Tera Dornfeld tera.dornfeld@state.mn.us	(651) 201-2206

Relevant Documents	Date
<i>Xcel Energy (20-406)</i>	
Initial Filing – 2019 Annual Safety, Reliability, and Service Quality Report	April 1, 2020
Notice of Comment Period for 2019 Service Quality & Reliability	April 20, 2020
Department of Commerce – Comments	August 19, 2020
Suburban Rate Authority- Reply Comments	September 2, 2020
Xcel Energy – Reply Comments	September 2, 2020
PUC Information Request	September 16, 2020
Xcel Energy ERRATA to 2019 Annual Service Quality Report and Petition	September 18, 2020
Xcel Energy- Information Requests 001 & 002	September 30, 2020
Department of Commerce –Response to Reply Comments	October 6, 2020
<i>Otter Tail Power (20-401)</i>	
Initial Filing – 2019 Annual Safety, Reliability, and Service Quality Report	April 1, 2020
Department of Commerce – Comments	August 12, 2020
PUC Information Request	September 16, 2020
Otter Tail Power Response to Information Request	September 23, 2020
<i>Minnesota Power (20-404)</i>	
Initial Filing – 2019 Annual Safety, Reliability, and Service Quality Report	April 1, 2020
Department of Commerce – Comments	August 12, 2020
Minnesota Power – Comments	August 12, 2020
PUC Information Request	September 16, 2020

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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.

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Statement of the Issues

Should the Commission accept the portion of the utilities’ annual Safety, Reliability, and Service Quality reports for 2019 related to customer service quality?

What action should the Commission take on utilities’ proposed public facing summary of the annual reports?

Should the Commission take any other action on the annual reports?

I. Introduction

Minnesota’s Investor Owned Utilities (IOUs) submit Safety, Reliability, and Service Quality (SQR) Reports annually. Since 2018, Commission staff has split the reports into three sections. The Safety and Reliability portion will be summarized in **Volume 1** of briefing papers; **Volume 2**, this current document will focus on the Service Quality and Reporting metrics as laid out in [Minnesota Rules, Chapter 7826, Electric Utility Standards](#), with specific attention to the reporting requirements enumerated in 7826.1400 to 7826.2000. **Volume 3** will focus on Xcel Energy’s proposed Locational Reliability, Service Quality, and Equity Metrics and associated comments.

Staff has provided a single set of decision options and recommendations for Volume One, Two, and Three of the briefing papers, the decision options are replicated in all documents.

II. Reporting Standards

Minnesota Rules 7826 requires a variety of reporting by the utilities. This briefing paper will address the service quality, which includes: disconnection and involuntary disconnections,

extension service requests, call center response times, customers who have requested medical account status, and customer complaints. Volume Two will also discuss each IOU's public facing summary of annual reports

- 7826.1400 REPORTING METER-READING PERFORMANCE.
- 7826.1500 REPORTING INVOLUNTARY DISCONNECTIONS.
- 7826.1600 REPORTING SERVICE EXTENSION REQUEST RESPONSE TIMES.
- 7826.1700 REPORTING CALL CENTER RESPONSE TIMES.
- 7826.1800 REPORTING EMERGENCY MEDICAL ACCOUNT STATUS.
- 7826.1900 REPORTING CUSTOMER DEPOSITS.
- 7826.2000 REPORTING CUSTOMER COMPLAINTS.

A. Meter Reading Performance (7826.1400)

The annual service quality report must include a detailed report on the utility's meter-reading performance, including, for each customer class and for each calendar month:

- A. the number and percentage of customer meters read by utility personnel;
- B. the number and percentage of customer meters self-read by customers;
- C. the number and percentage of customer meters that have not been read by utility personnel for periods of six to 12 months and for periods of longer than 12 months, and an explanation as to why they have not been read; and
- D. data on monthly meter-reading staffing levels, by work center or geographical area.

1. Xcel Energy

Xcel Energy filed amended metered reading data for 2019; the Company read an average of 1,786,508 meters per month (99.85% of total meters installed) while customers read an average of 7.1 meters per month.¹ A total of 2,702 meters were not read for a period of 6-12 months for all customer classes². A total of 1,548 meters were not read for a period >12 months for all customer classes³. The Department stated that Xcel Energy attained required meter reading averages by month⁴. The Department also stated the current staffing levels and noted they are similar to 2018. Finally, the Department found that Xcel Energy has fulfilled rule 7826.1400.

2. Minnesota Power

Minnesota Power provided the required information in Attachment A. The Department summarized, "Minnesota Power reported that it read 98.95% of residential meters, 98.63% of commercial meters, 99.83% of industrial meters, 99.94% of municipal pumping meters and 99.96% of lighting meters. MP reported that it had a total of 47 customers who had not had

¹ Xcel Energy ERRATA to 2019 Annual Service Quality Report and Petition PDF p3 (September 18, 2020).

² *Ibid.* PDF p4-6

³ *Ibid.* PDF p7-9

⁴ Department for Xcel Energy p26 (August 19, 2020)

their meter read for between six and twelve months, and no customers who went beyond twelve months without having their meter read.⁵ Staff notes that MP has supplied all required reporting information.

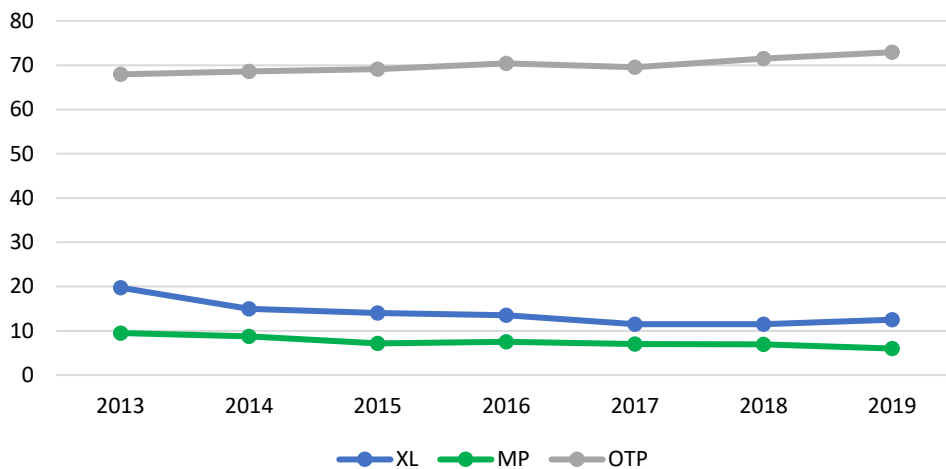
In previous years' briefings, Staff had tracked Minnesota Power's (MP) metering network. Presently, the network is comprised of about 60.13% Advanced Metering Infrastructure (AMI) Solid State, 38.18% Automatic Meter Reading (AMR) Mechanical Hybrid, and 1.54% AMR Solid State⁶. As stated in the Company's 2018 Annual Report, at a rate of 6-8% annually, MP will have AMI fully implemented in their service territory by the end of 2025.⁷

3. Otter Tail Power

The Department stated that Otter Tail Power read at least 97 percent of all meters each month during 2019. Two meters were not read for a period of 6-12 months in 2019; no meters were not read for a period of greater than 12 months. In addition, Otter Tail used a third party to read the Company's meters in 72 cities within their Minnesota service territory (note, a third party was used to read meters in 47 cities in 2018). The Department stated that Otter Tail Power has fulfilled the terms of rule 7826.1400 and in fact, "The Department notes that OTP has improved its meter-reading performance over the years measured."⁸

4. Comparison Among Utilities

Meter Reading Staff



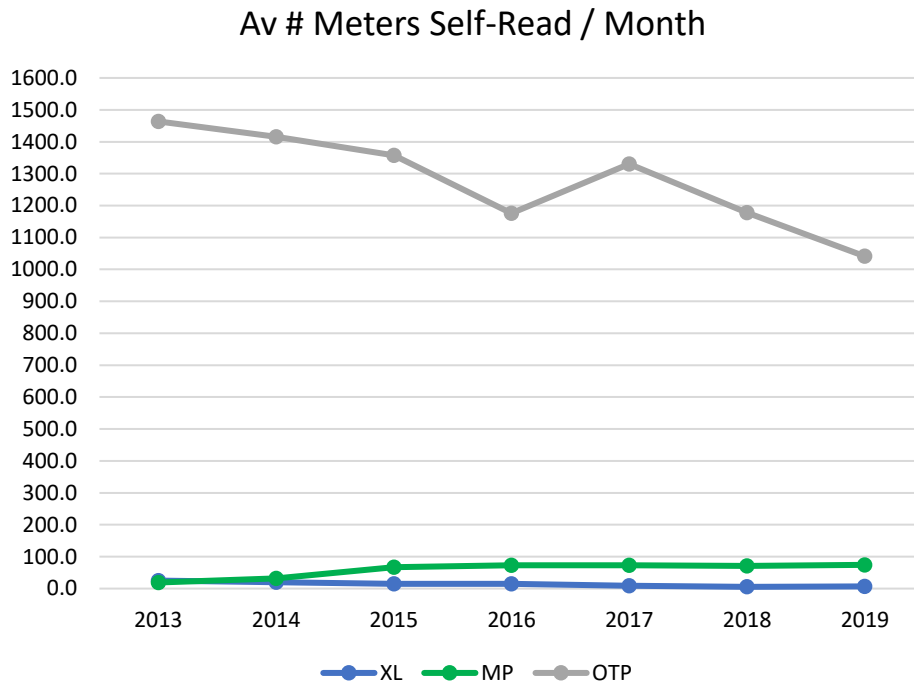
⁵ Department for Minnesota Power p11 (August 12, 2020).

⁶ Minnesota Power 2019 Annual Safety, Reliability and Service Quality Report at Appendix A, p 20 (April 1, 2020).

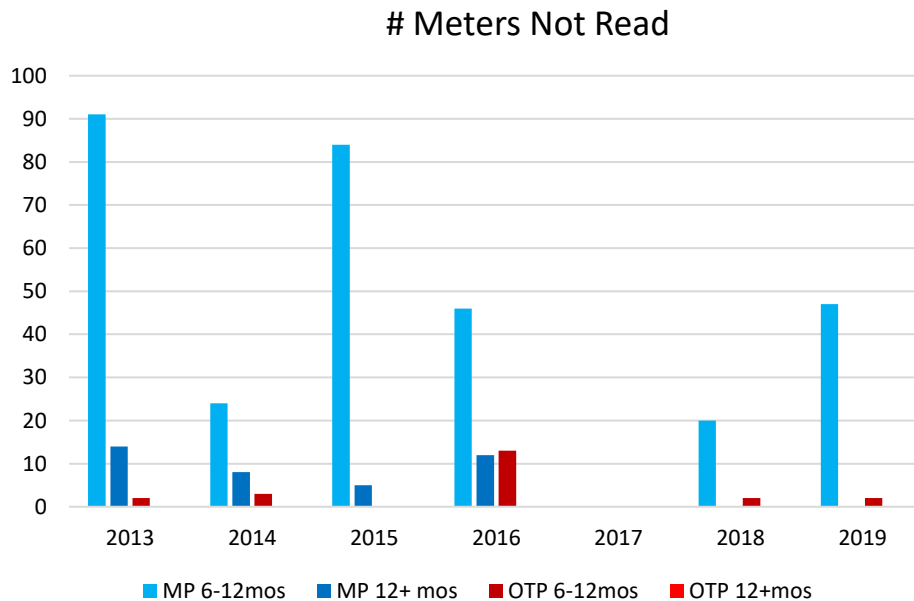
⁷ Minnesota Power 2018 Annual Safety, Reliability and Service Quality Report at Appendix A, p 14 (April 12, 2019).

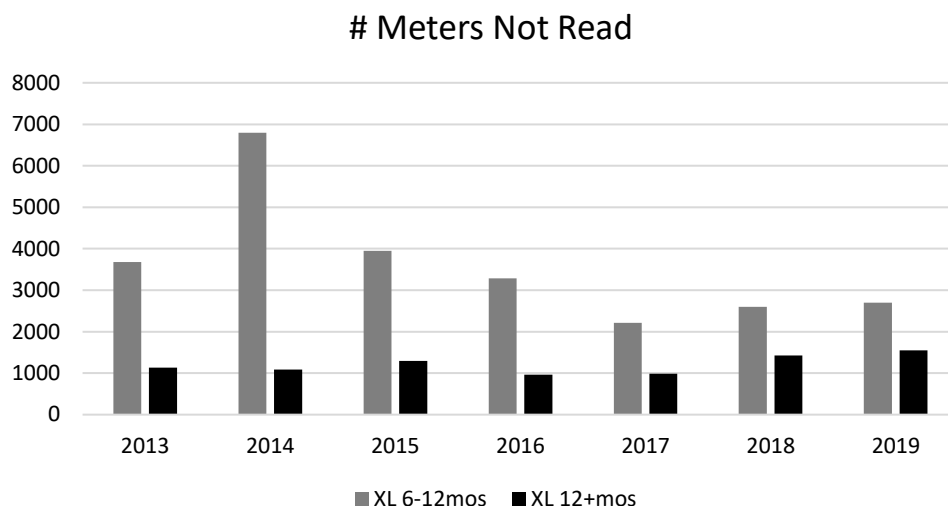
⁸ Department for Otter Tail Power p18 (August 12, 2020); Minnesota cities include: Amiret, Argyle, Audubon, Battle Lake, Bejou, Beltrami, Bemidji, Brooks, Boyd, Burr, Campbell, Canby, Clearbrook, Climax, Clitherall, Crookston, Dalton, Dent, Deer Creek, Detroit Lakes, Doran, Dumont, Eldred, Erskine, Fergus Falls, Fertile, Fisher, Frazee, Foxhome, Gently, Green Valley, Gonvick, Gully, Hallock, Henning, Kent, Lockhart, Mahnomen, Marshall (rural), McIntosh, Milroy, Minneota, Nashua, New York Mills, Oklee, Oslo, Ottertail, Pelican Rapids, Perham, Plummer, Porter, Red Lake Falls, Richville, Rothsay, Saint Hilaire, Shevlin, Solway, St. Leo, Taunton, Tenney, Tintah, Trail, Twin Valley, Ulen, Underwood, Vergas, Vining, Waubun, Wendell, Wheaton, Wilton, and Winger.

Meter reading staff has been consistent for all utilities since 2013. However, note the large difference in staffing when Otter Tail staff is compared to Minnesota Power and Xcel.



The average number of meters that are self-read by customers per month are consistent across years for Xcel and Minnesota Power. In contrast, note both the decline as well as the relatively high number of self-reads for Otter Tail Power. Number of self-reads for OTP is confusing considering the Company’s relatively large meter reading staff but is perhaps necessary given OTP’s large service territory. See below (# Meters Not Read), however, as these data do not appear alarming or increasing.





To both provide a customer touch point, by reading meters in person, as well as ensuring that meters are read, Staff prepared a summary of meters not read for time periods of 6-12 months and longer than 12 months (Staff awaits 2017 MP data). Xcel reported the largest number of meters not read, perhaps owing to a larger customer base and therefore, is shown on a separate graph.

B. Involuntary Disconnections (7826.1500)

The annual service quality report must include a detailed report on involuntary disconnections of service, including, for each customer class and each calendar month:

- A. the number of customers who received disconnection notices;
- B. the number of customers who sought cold weather rule protection under Minnesota Statutes, sections 216B.096 and 216B.097, and the number who were granted cold weather rule protection;
- C. the total number of customers whose service was disconnected involuntarily and the number of these customers restored to service within 24 hours; and
- D. the number of disconnected customers restored to service by entering into a payment plan.

1. Xcel Energy

The Company noted that disconnection data is comprehensive of gas *and* electric customers as approximately 94% of Xcel’s Minnesota customers are electric or combined gas and electric customers.⁹ For customers who receive gas and electric service, a disconnect would be due to the total amount of regulated charges overdue.¹⁰ The Company’s customer service system does not have the functionality to sort the data or track disconnects due to electric non-payment.¹¹

⁹ Specifically, Minn. R. 7820.2400: Notice shall be sent to the address where service is rendered **and** to the address where the bill is sent if different from the address where service is rendered.

¹⁰ Xcel Energy 2019 Annual Safety, Reliability and Service Quality Report PDF page 48 (April 1, 2020).

¹¹ *Id.*

Also, concerning the requirement under [Minn. R. 7820.2400](#), Xcel sends duplicate notices to multiple addresses for each disconnected customer; this practice impacts their reported numbers.¹² To this extent, reported numbers do include duplicates and does not separately count unique customer circumstances.¹³

Staff notes Xcel's fulfillment of reporting requirements. 492,009 disconnection notices were sent (in total for the year) to residential customers; of these customers 16,693 were disconnected. Of disconnections, 6318 were restored in 24 hours and 4250 by payment plans. 80,713 customers requested CWR; 100% were granted¹⁴.

In terms of its 2019 Annual Report, the Department asked, "that Xcel provide some additional information as to the significant increase in the number of customers entering payment plans in 2019 in its Reply Comments."¹⁵

Xcel replied by stating,

"We engaged key stakeholders to create short- and long-term plans to enhance the customer experience and to provide a more supportive payment plan negotiations process. We redesigned Call Center employee training to emphasize and clarify considerations for extenuating circumstances in setting payment plans. We also created a new resource tool for Call Center employees, which helps them to have consistent and compassionate conversations with customers. As a result of this initiative, our Call Center employees were able to negotiate significantly more mutually agreed upon payment arrangements to help customers restore service and manage their Xcel Energy bills."¹⁶

2. Minnesota Power

The Department provided a table (2015-2019) of reported metrics and also summarized, "In 2019, MP sent 16,049 disconnection notices to residential customers, 1,051 notices to commercial customers, and 28 notices to industrial customers. A total of 4,232 residential customers sought and received Cold Weather Rule (CWR) protection. MP involuntarily disconnected a total of 2,138 residential customer, 112 commercial and one industrial customer. A total of 1,056 residential customers, or 49.4%, were restored within 24 hours. In addition, a total of 1,357 residential customers had service restored upon entering a payment plan."¹⁷ Therefore, MP reported all information required under 7826.1500¹⁸.

3. Otter Tail Power

The Department noted, "OTP reported that 56,257 disconnection notices were sent to residential, small commercial and large commercial customers in 2019, 51,024 being for residential customers. This number is down from 2018, however is still higher than the

¹² *Id.*

¹³ *Id.*

¹⁴ Xcel Energy 2019 Annual Safety, Reliability and Service Quality Report PDF p 69 (April 1, 2020).

¹⁵ Department Comments for Xcel Energy p28 (August 19, 2020).

¹⁶ Xcel Energy Reply Comments p6-7 (September 2, 2020)

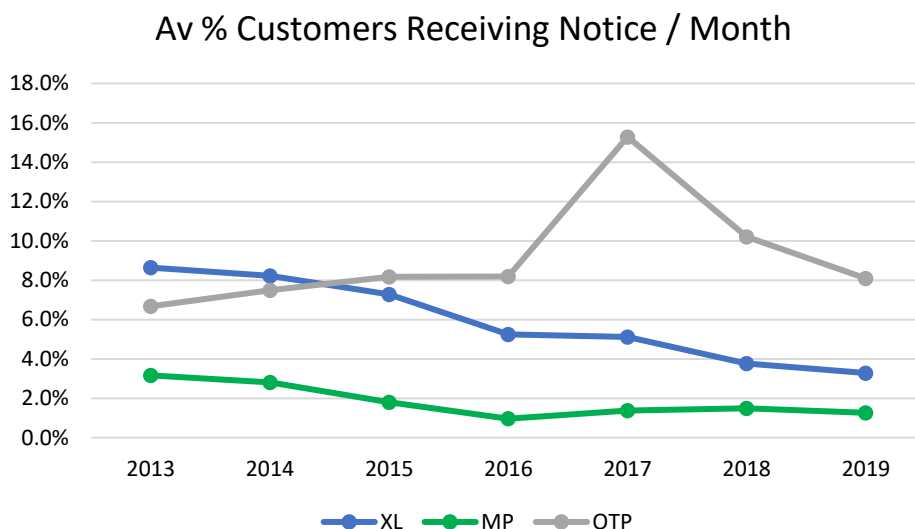
¹⁷ Department Comments for Minnesota Power p12 (August 12, 2020).

¹⁸ MP 2019 Annual Safety, Reliability and Service Quality Report Appendix A, PDF p26-29 (April 1, 2020).

Company’s previous numbers. The Company notes that disconnections were suspended from February 4 through March 11 due to the time needed for the new Customer Information System (CIS) to be implemented so as to allow for future disconnection notices from the new system.”¹⁹ The Department noted Otter Tail’s fulfillment of reporting requirements.

Staff also notes Otter Tail Power’s fulfillment of reporting requirements. 51,024 disconnection notices were sent (in total for the year) to residential customers; of these customers 463 were disconnected. Of disconnections, 146 were restored in 24 hours and 27 by payment plans. 441 customers requested CWR; of those 398 were granted²⁰.

4. Comparison Among Utilities

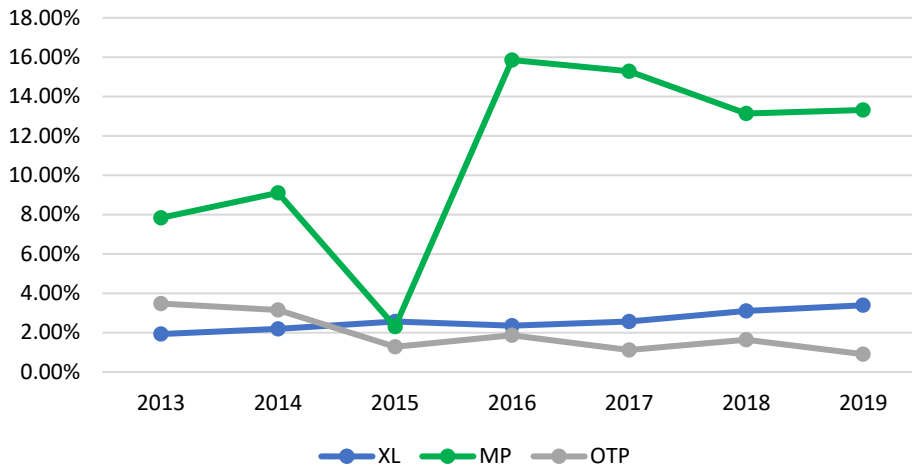


Examining the percent of customers receiving disconnection notices may give insight as to the degree to which customers are having trouble paying their bills. Staff had been monitoring the large increase of notices sent by OTP in 2017. Staff sees a decrease in the number of notices sent but still, as a percent of total customers, OTP sends more notices than MP or Xcel.

¹⁹ Department Comments for Otter Tail Power PDF page 20 (August 12, 2020).

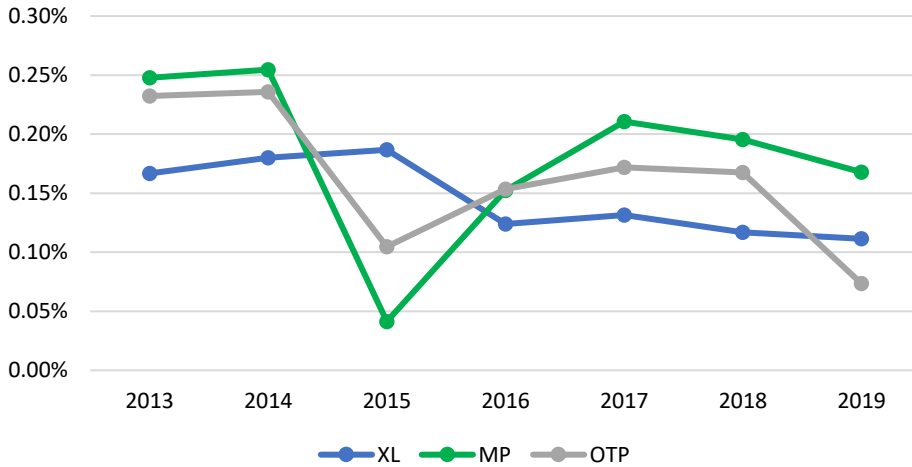
²⁰ OTP 2019 Annual Safety, Reliability and Service Quality Report PDF p51-53 (April 1, 2020).

% Customers sent notice AND disconnected



A two-fold benefit comes from examining the ratio of disconnection notices to actual disconnections: a look at the willingness of utilities to work with customers as well as the overall financial well-being (and health) of customers. Related to both benefits, disconnections show, in part, the effectiveness of Energy Assistance programs.

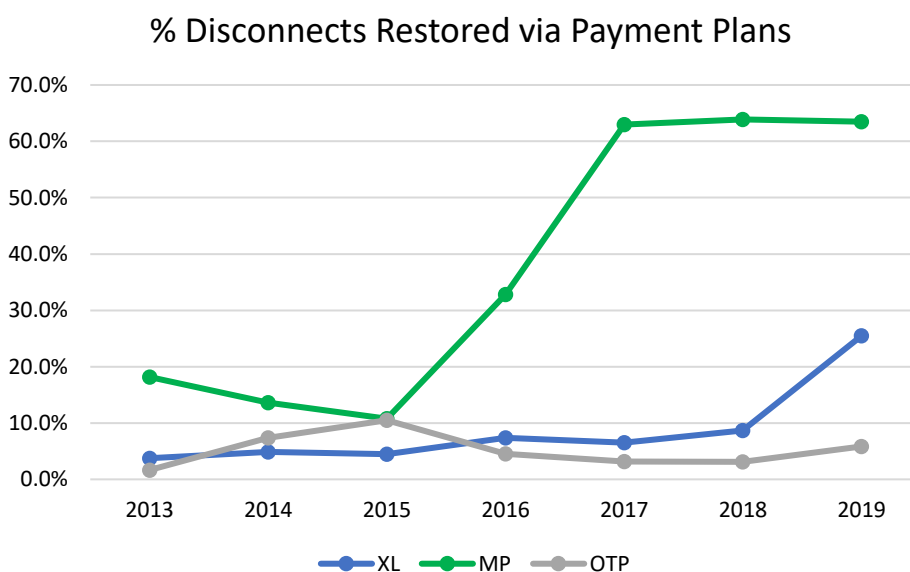
%Residential Customers Disconnected / Month



Staff found it helpful to view disconnections as a percent of total customers. The above figure shows the monthly average for percent of total customers who are involuntarily disconnected. Though the percent appears small (and similar for each IOU), large numbers of people are disconnected each month. See the table below for 2019 data.

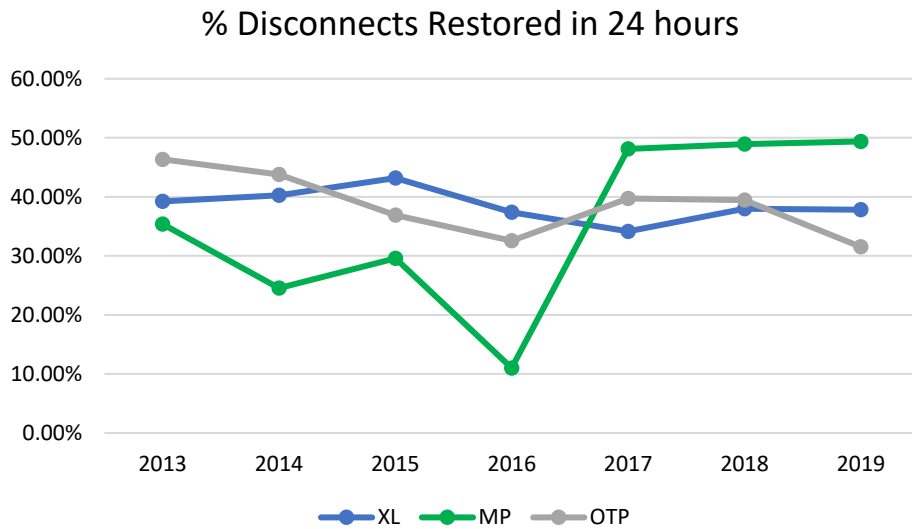
IOU	Total Residential Customers	# Customers Disconnected (monthly average)
Xcel Energy	1,249,142	1391.1
Minnesota Power	106,257	178.2
Otter Tail Power	52,534	38.6

Not every customer remains disconnected. The following two figures show customers that are returned to service within 24 hours as well via payment plans.

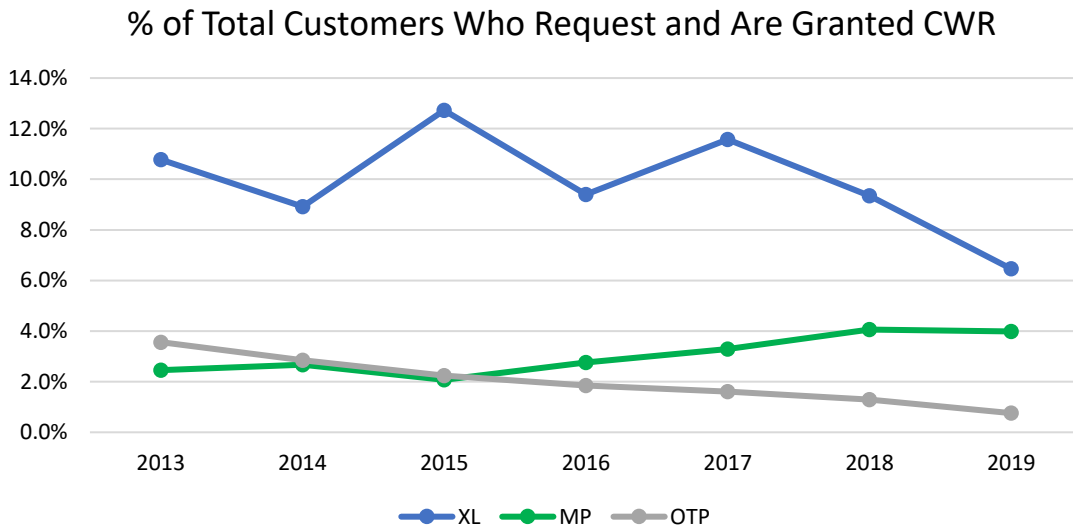


Use of payment plans is thought to demonstrate utilities’ responsiveness to disconnected customers. Note the large percent (63%) of MP customers in 2017 restored via payment plans, a percent that has since been maintained. Moreover, note the 2019 uptick in payment plans for Xcel’s customers (explained above and in Xcel’s Reply Comments²¹). Both IOUs’ payment plan increases underscore the importance of sharing effective practices, like filings in docket 20-375 (the Commission’s COVID docket related to disconnections). To this extent, the percent of disconnected customers taking advantage of plans may prompt the Commission to order additional customer outreach.

²¹ Xcel Energy Reply Comments filed 2 September 2020 pages 6-7



Payment plans show an investment in the customer, allowing them to pay bills over a longer time period. Conversely, the percent of disconnects restored within 24 hours shows the number of customers immediately able to find the resources to get current on their bill. The figure shows a decrease in 24-hour restoration for OTP but stability for Xcel and MP.



CWR protection was granted to 100% of customers requesting protection by Xcel Energy and Minnesota Power; 90% of requests were granted by Otter Tail Power. Despite high approval of requests, viewing the number of customers enrolled in the protection as a percent of total customers gives perspective on the extent to which customers take advantage of protection.

C. Service Extension Request Response Times (7826.1600)

Under this rule, utilities are required to report on service extension request response times, including, for each customer class and each calendar month:

- A. The number of customers requesting service to a location not previously served by the utility and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service.
- B. The number of customers requesting service to a location previously served by the utility, but not served at the time of the request, and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service

1. Xcel Energy

Compared to previous years, Xcel received a similar number of requests for service to locations previously served and like previous years, those requests were handled on the next business day²². The Company received 500 more requests (compared to 2018) in locations not previously served and the time to complete requests nearly doubled. The Department picked up on this increased service time noting, "Response times for residential and commercial customers in 2019 were significantly higher than data from 2009 - 2017. However, Xcel indicated that the 2019 Report reflected service extension request times as tracked by its new Systems, Applications, Processes (SAP) work management system. During the second year of implementation the Company discovered it needed to provide further refinements and support to the groups that track this work. That the process is ongoing. The Department acknowledges Xcel's fulfillment of the requirements of Minnesota Rules, part 7826.1600."²³

2. Minnesota Power

Since 2013, MP has connected most not-previously-served locations on the day requested. However, in 2019 this was not the case; MP had realized even distribution among connections made on the day requested, in 1-10 days, and in 10+ days from the date requested²⁴. Staff awaits data for locations previously served.

The Department reported that, "MP met the requested in-service date for residential installations 44.4% of the time, and its commercial installations 33.9% of the time. Of the 3 industrial installations, MP reported that all but one fell into the 1-20 days overdue category. MP stated that the primary reason for not meeting an in-service date in 2019 was failure to update dates (61.8%), the customer not being ready (17.7%) and weather (8.8%)."²⁵

3. Otter Tail Power

In 2019, OTP saw the lowest number of requests for service to areas NOT previously served since 2013. Since 2013, most requests have been fulfilled on the date requested. However, in 2019 only 65 requests were completed on the date requested while 145 took 1-10 days longer than requested and 51 took >10 days over the service date requested. For locations previously served, OTP saw almost 7,900 requests (compared to ~2,000 requests/ year since 2013). Between 2013 and 2018, OTP had fulfilled most service requests on the date requested;

²² Xcel Energy 2019 Annual Safety, Reliability and Service Quality Report PDF p71-72 (April 1, 2020).

²³ Department Comments for Xcel Energy p28 (August 19, 2020).

²⁴ MP 2019 Annual Safety, Reliability and Service Quality Report, Appendix A, PDF p30-34 (April 1, 2020).

²⁵ Department Comments for Minnesota Power p12 (August 12, 2020).

however, in 2019 while over 5600 requests were completed on the date requested, over 2200 requests took 1-10 days over the service date requested (see table below).

Year	Requests to Locations Previously Served	Connected on date requested	Connected 1-10 days late	Connected 11+ days late
2013	2,192	2178	13	1
2014	2,166	2159	6	1
2015	2,004	1999	4	1
2016	1,993	1977	16	0
2017	1,873	1863	8	2
2018	1878	1861	16	1
2019	7898	5652	2239	7

The Department stated, "OTP reported a significant increase in the number of extension requests made in 2019 compared to previous years; however, response times for 2019 appear to be relatively consistent with past years. The Department acknowledges that OTP has fulfilled the requirements of Minnesota Rules, part 7826.1600.²⁶"

Staff notes a large increase in service delays. OTP explained this as a function of their reporting system which, starts counting customer service time at the moment of initial inquiry,

“When we converted to our new CIS system, we also implemented a process to address adding new locations fitting the capabilities of the new system. In this process, we have our customers call us to create an account. During this discussion with the customer, as a part of the process, the system creates a service order to our field personnel to have the power connected when the customer is ready for service. In 2019 we realized the need to refine this process. By creating service orders at the time customers create their accounts, service orders will sit in an open status until the customer is ready for service to be connected, which might be months later.²⁷”

D. Call Center Response Times (7826.1700 and 7826.1200)

On an annual basis, utilities shall answer 80% of calls made to the business office during regular business hours within 20 seconds. "Answer" means that an operator or representative is ready to render assistance or accept the information to handle the call. Acknowledging that the customer is waiting on the line and will be served in turn is not an answer. If the utility uses an automated call-processing system, the 20-second period begins when the customer has selected a menu option to speak to a live operator or representative. Utilities using automatic call-processing systems must provide that option, and they must not delay connecting the caller to a live operator or representative for purposes of playing promotional announcements.

²⁶ Department Comments for Otter Tail Power p20 (August 12, 2020).

²⁷ Otter Tail Power 2019 Annual Safety, Reliability and Service Quality Report p54 (April 1, 2020).

On an annual basis, utilities shall answer 80% of calls directed to the telephone number for reporting service interruptions within 20 seconds. "Answer" may mean connecting the caller to a recording providing, to the extent practicable, at least the following information:

- A. the number of customers affected by the interruption;
- B. the cause of the interruption;
- C. the location of the interruption; and
- D. the utility's best estimate of when service will be restored, by geographical area.

1. Xcel Energy

The DOC noted that, "Xcel provided monthly call volume and response time information. In 2019, an average of 80.5 percent of calls to the Company were answered within 20 seconds. The Company assumes that all calls handled by its Interactive Voice Response (IVR) system are answered within 20 seconds. For calls handled by Xcel's Agents, an average of 76.8 percent were answered within 20 seconds in 2019²⁸."

Understanding Xcel's call center response time was believed to warrant some follow up as the order filed in docket 17-553 allowed Xcel Energy to modify (decrease) its non-emergency call center hours of operation. Xcel was required to submit two years of compliance review for service provided in 2018 and 2019.

With respect to the 17-553 order and another, requiring reporting of credit calls²⁹, the Department noted that, "The Company explained that it included credit calls in its annual call center response time calculation and that the results of that calculation were consistent with the requirements in the Commission's rules. In addition, Xcel stated that it has not received any complaints about its changes to its hours of operation for non-emergency calls in 2018 and 2019³⁰."

The DOC did raise an issue with Xcel's 2019 report, "In our comments in Xcel's 2019 Gas Service Quality Report (Docket No. G002/M-20-460) we noted that the average speed of answer for agent-only calls had increased from 22 seconds in 2018 to 27 seconds in 2019. The Department asked that Xcel explain that increase in its Reply Comments in that proceeding. We would ask that Xcel Electric provide that same information in this proceeding in its Reply Comments.³¹"

Xcel responded to the DOC by explaining that three months contributed to the increase in average call center response time³²:

1. April- related to CWR. Credit agents received 30% more calls than previous daily record. However, Xcel noted, "In our experience, it is not prudent to hire and train contract staff for this relatively short peak that takes place once annually.³³"

²⁸ Department Comments for Xcel Energy p29 (August 17, 2020) based on calculations made by the Department from data provided in Table 16, p59 of the Report.

²⁹ The Commission's November 3, 2004 Order in Docket No. E002/M-04-511, at Order Point 6.

³⁰ Department Comments for Xcel Energy p32 (August 19, 2020).

³¹ *Ibid.* p29

³² Xcel Energy Reply Comments p8 (September 2, 2020)

³³ *Ibid.*

2. September- an unplanned Customer Resource System outage (of which the Commission was informed). Outage restricted customer use of self-serve transactions as well as IVR platform. Therefore, more calls were sent directly to Call Center agents.
3. October- high call volume from late September rolled over into October.

In its Reply Comments, the Department voiced dissatisfaction with Xcel’s response,

“The Department recognizes and appreciates the Company’s efforts addressing the annual spike in credit-related calls prompted by the expiration of the CWR. The Company’s CRS four-day unplanned outage is concerning, however. Xcel’s Minnesota customers deserve a better level of service than the one provided in September and October 2019. The Department recommends that the Commission require Xcel to provide additional information in its 2020 Annual Service Quality Report that discusses the Company’s efforts to improve the reliability of its Customer Resource System³⁴.”

Staff is concerned that the percent of calls answered by agents was less than the required 80% of calls answered within 20 seconds (see table below). Staff requested Xcel explain choosing to report Service Level Data (implying calls answered by IVR were included in calculations) as opposed to calls answered only by agents³⁵. The Company explained why calls might be sent to various call center groups (e.g. residential, small business, credit calls for customers with past due balances, IVR, and PAR for low-income services) and that, “Although the reporting on call center response times has evolved organically over time and new lines have been added to Attachment K, we have used this same approach for reporting for more than 15 years, since Rules 7826.1200 and 7826.1700 became effective. ³⁶”

Year	Data supplied by Xcel for compliance		Calls offered to and answered by Agents within 20 seconds
	Residential, BSC, Credit, PAR, IVR handled outage calls	Residential, BSC, Credit, PAR, all IVR handled calls	
2019	80.5% in 20 sec. or less	90.8% in 20 sec. or less	76.8%

Table. All service level calls offered to agents, which in addition to Residential, BSC, Credit and PAR, includes all IVR handled calls.

Xcel Energy also used its Reply Comments to provide information on the impacts of COVID-19 to its Call Center. In March, the Company transitioned Call Center employees to work-from-home without impact on performance or customers. Commission-initiated customer protections decreased call volume March-May 2020. The Company saw little staff attrition. June and July call volume returned to historic averages; coupled with longer call handling times and increased staff attrition, Xcel is taking steps to hire more staff³⁷.

2. Minnesota Power

³⁴ Department’s Response Comments to Xcel Energy p5 (October 6, 2020).

³⁵ Information Request to Xcel Energy (September 16, 2020).

³⁶ Xcel Energy response to Information Request (September 30, 2020).

³⁷ *Ibid.* p8-9

The Company's call center is open 7:00am to 5:30pm Monday – Friday. "Minnesota Power answered 84 percent of calls in 2019 during business hours within 20 seconds, exceeding the annual goal of 80 percent, as defined in Minn. Rule 7826.1200. Minnesota Power met or exceeded the 80 percent goal threshold 10 out of 12 months of the year [threshold was not met in April (79%) and May (61%)].³⁸ More, Minnesota Power broke down calls into 20 subject matter categories.

3. Otter Tail Power

The Company reported calls to its call center received between 8am and 5pm. In 2019, the call center experienced a decrease in calls answered within 20 seconds compared to previous years. This decrease may be explained by considering that the Company changed to a new Customer Information System (CIS) and lost call center employees, both during the onset of Cold Weather Rule (a time of high call volume). However, showing evidence of improved call center service, the percent of calls answered within 20 seconds increased from October to December.

Perhaps also a function of the challenges mentioned above, the number of abandoned calls increased in 2019. Otter Tail Power is the only utility to report both total calls and calls offered (Xcel reports only calls offered while MP reports only total calls). For OTP, subtracting calls offered from total calls results in the number of abandoned calls. Staff requested OTP define abandoned calls, explain why abandoned calls were not included in calculations of calls answered within 20 seconds, and share any information as to why calls may be abandoned³⁹. The Company replied that abandoned calls are those ended by the caller or dropped before they are answered- in all circumstances, the caller is electing to end the call⁴⁰. OTP customers abandoned an average of 0.7% to 2.5% of total calls per year for the years 2013 - 2019. In their response to Staff's information request, OTP updated their call center response times and, owing to the challenges identified above, acknowledge that their average percent of calls responded to within 20 seconds did not meet the 80% threshold but performance improved as 2019 progressed.

4. Reporting Additional Customer Contact Points

Via the same information requests, with an additional request to MP⁴¹, all utilities were asked to discuss reporting the number of customer contacts received through platforms beyond the call center; this included but was not limited to emails received, website visits, and use of online "Apps." Utilities were also asked the feasibility of reporting email response time and categorizing the subject matter of customer emails. All utilities reported monthly and yearly totals for the following additional customer contact platforms:

³⁸ Minnesota Power 2019 Annual Safety, Reliability and Service Quality Report p35 (April 1, 2020).

³⁹ Information Request to Otter Tail Power (September 16, 2020).

⁴⁰ Otter Tail Power response to Information Request (September 23, 2020).

⁴¹ Information Request to Minnesota Power (September 16, 2020).

	Email	Website	Facebook	My Account	Mobile App	Add'l Social Media
Xcel	X	X	X	X	X	Twitter
MP	X	X	X		X	
OTP	X	X	X			Twitter; LinkedIn

Xcel Energy stated that they can report social media platform analytics: page visits, likes, and tags. They can track unique users and page visits to their website. The Company can record unique customer logins to their My Account. Xcel could track subject categories and response times to residential email but not response times to social media contacts or emails sent to Business Solutions Center or customer account representatives.

Minnesota Power stated that they could provide email response time but only for emails to their Customer Service email address, not to individual customers nor for responses to My Account inquiries. MP notes ability to report email by subject category (subjectively determined by each Call Center agent).

Otter Tail Power does not currently have a Company App. OTP receives emails via Contact Us and Self-Service (though they also have several other email addresses). OTP can manually sort Contact Us emails (as these are sent to their CIS) by subject category; they are determining feasibility to automate the process. They cannot track email response time.

E. Emergency Medical Account Status (7826.1800)

Each utility must report the number of customers who sought emergency medical account status provided under Minnesota Statutes [216B.098](#), subd 5 and must also include the number of applicants who were granted or denied status, as well as the reason(s) for denial.

1. Xcel Energy

In 2019 a total of 2420 requests were received for EMS; of these, 224 requests were denied. Xcel stated, “The reasons for denial of emergency medical account status include customers not returning the form to the Company and the doctor refusing to certify the customer needing medical/life support.⁴²” “The Department acknowledges that Xcel has fulfilled the requirements of Minnesota Rules, part 7826.1800.⁴³”

2. Minnesota Power

MP reported 234 customers requested emergency medical account status, of which 17 were denied. Denial was primarily the result of insufficient documentation.

3. Otter Tail Power

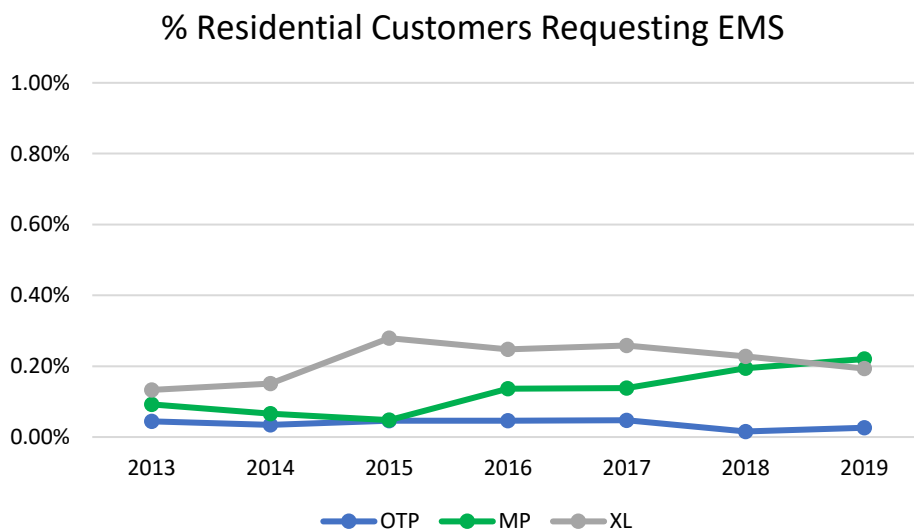
The Department shared, “OTP reported that 14 Minnesota customers requested emergency medical account status in 2019, all of whom were granted that status. The Department

⁴² Xcel Energy Initial Filing PDF p75 (April 1, 2020)

⁴³ Department Comments for Xcel Energy at page 29 (August 19, 2020).

acknowledges OTP’s fulfillment of the requirements of Minnesota Rules, part 7826.1800 (p21).⁴⁴”

4. Comparison Among Utilities



Though the IOUs grant a high percentage of EMS requests, the percent of total customers protected by EMS is relatively small.

F. Customer Deposits (7826.1900)

The annual service quality report must include the number of customers who were required to make a deposit as a condition of receiving service.

1. Xcel Energy

Xcel Energy reported that, “During 2019, we requested a total of 486 deposits as a condition of service for our residential customers that had filed for bankruptcy. We request these deposits upon notification from the bankruptcy court and/or the customer of their bankruptcy petition.⁴⁵” The Department acknowledged Xcel’s fulfillment of the requirements of Minnesota Rules, part 7826.1900.⁴⁶

2. Minnesota Power

MP reported that they refunded all deposits in 2014, but may reconsider collection of deposits in the future.⁴⁷

3. Otter Tail Power

Otter Tail reported that, “652 customers were required to make a deposit as a condition of receiving service during 2019. The number of deposit requests decreased by 33 when

⁴⁴ Department Comments for Otter Tail Power at page 21 (August 12, 2020).

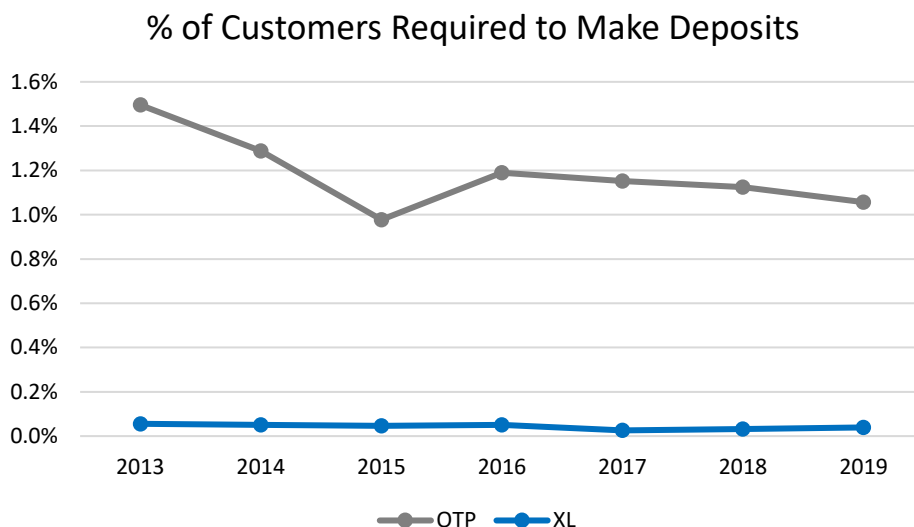
⁴⁵ Xcel Energy 2019 Annual Safety, Reliability and Service Quality Report p54 (April 1, 2020).

⁴⁶ Department Comments for Xcel Energy p30 (August 19, 2020)

⁴⁷ MP 2019 Annual Safety, Reliability and Service Quality Report, Appendix A, PDF p40 (April 1, 2020).

compared to 2018.⁴⁸ “The Department notes that the previous upward trend appears to be stabilizing in recent years. The Department acknowledges OTP’s fulfillment of the requirements of Minnesota Rules, part 7826.1900.⁴⁹”

4. Comparison Between Utilities



The above figure shows the percent of total customers required to make a deposit. Note the higher percent required by OTP compared to Xcel.

G. Customer Complaints (7826.2000)

Utilities must provide a detailed report on complaints by customer class and calendar month that include the following information:

- A. The number of complaints received.
- B. The number and percentage of complaints alleging billing errors, inaccurate metering, wrongful disconnection, high bills, inadequate service, and the number involving service extension intervals, service-restoration intervals, and any other identifiable subject matter involved in five percent or more of customer complaints.
- C. The number and percentage of complaints resolved upon initial inquiry, within ten days, and longer than ten days.
- D. The number and percentage of all complaints resolved by taking any of the following actions:
 - (1) Taking the action the customer requested;
 - (2) Taking an action the customer and the utility agree is an acceptable compromise.

⁴⁸ Otter Tail Power 2019 Annual Safety, Reliability and Service Quality Report PDF p64 (April 1, 2020).

⁴⁹ Department Comments for Otter Tail Power Company p21 (August 12, 2020).

(3) Providing the customer with information that demonstrates that the situation complained of is not reasonably within the control of the utility.

(4) Refusing to take the action the customer requested.

E. The number of complaints forwarded to the utility by the commission's Consumer Affairs Office for further investigation and action.

1. Xcel Energy

"The Department acknowledges Xcel's fulfillment of the requirements of Minnesota Rules, part 7826.2000.⁵⁰"

The Commission Ordered⁵¹ Xcel to explain how customer complaints are received beyond the call center (e.g. electronic means like email). The Company gave an overview of these channels: email, mobile app, and social media. More, the Company also outlined internal "touchpoints" where customers can raise complaints, like to Community Relations Managers⁵². Staff follows up with this topic in the Staff Analysis section.

The Company was also required⁵³ to explain complaints recorded as situations not within the Utility's control. The company gave examples of some of these situations: "situations involving equipment operating as designed, equipment not owned by Xcel Energy, Cold Weather Rule and Tariffs being followed, disconnection notices sent, and customer's service disconnected in compliance with Commission Rules⁵⁴" as well as property sales and/or landlord and tenant disagreements. These scenarios fell into the complaint categories: inadequate service (59.7% of total residential and commercial complaints); billing errors (11.1% of total); wrongful disconnection (17.3% of total)⁵⁵.

2. Minnesota Power

The Department presented a table of historic complaint totals as well as reported the time to resolve complaints and number of complaints forwarded by the CAO. The Department did not indicate any issues with MP's 2019 data.

3. Otter Tail Power

"The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules, part 7826.2000" and notes that 68% of complaints are in "other" category.⁵⁶

⁵⁰ Department Comments for Xcel Energy p31 (August 19, 2020).

⁵¹ The Commission's May 14, 2019 Order in Docket No. E-002/M-18- 239, at Order Point 3

⁵² Xcel Energy 2019 Annual Safety, Reliability and Service Quality Report p56-57 (April 1, 2020).

⁵³ The Commission's May 14, 2019 Order in Docket No. E-002/M-18-239, at Order Point 4

⁵⁴ Xcel Energy 2019 Annual Safety, Reliability and Service Quality Report p57 (April 1, 2020).

⁵⁵ *Ibid.* PDF p159

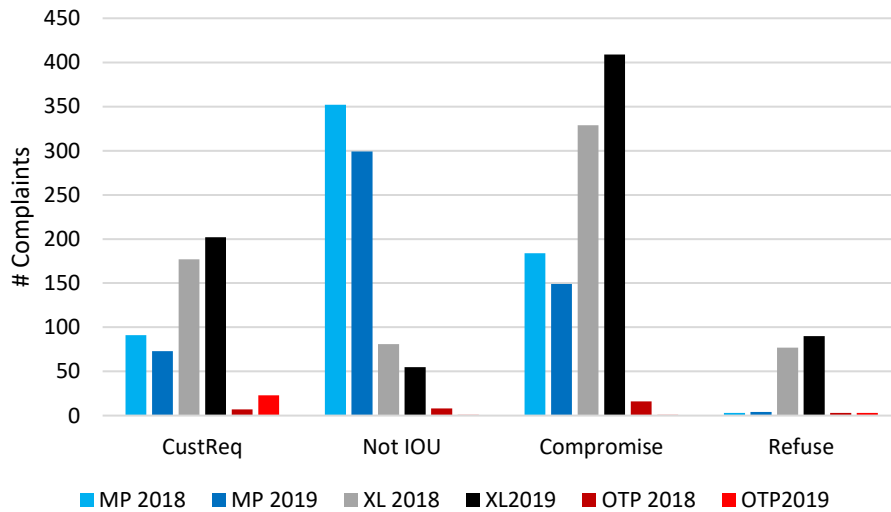
⁵⁶ Department Comments for Otter Tail Power p23 (August 12, 2020).

4. Comparison Among Utilities

	Complaints 2018	Total Customers 2018	Complaints 2019	Total Customers 2019
MP	630	146,690	525	147,297
XL	664	1,295,068	756	1,306,030
OTP	34	60,901	28	61,704

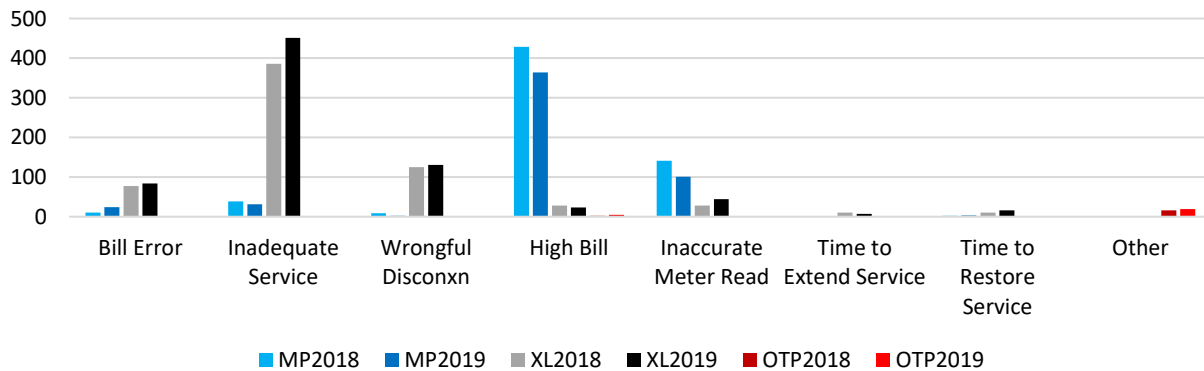
Note similarities in number of complaints received between MP and Xcel, despite a difference of nearly a degree of magnitude in total number of customers.

Complaint Resolution



If complaint resolution is one way that utilities can demonstrate willingness to work with customers, note the differences among utilities regarding how complaints are handled (Take the Action the Customer Requested, Demonstrate the Complaint is Not within the Scope of the IOU, Compromise, and Refuse to Take Action).

Complaints Received, by Type, Across Utilities



Note that 67.9% of total complaints to OTP are registered as “other;” “other” complaints are, “such things as rebate timing, planned outages and third-party meter readers.⁵⁷” Also note the number of complaints registered as “Inadequate Service” by Xcel Energy (about 40% of total complaints). The Company explained that these complaints, “included issues around the cold weather program, payment agreements, past due notices, our personal account representatives (PAR) (who handle our low income programs, emergency medical status, and energy assistance) and service issues.⁵⁸” Complaints filed under this heading appear to impact the Company’s most vulnerable customers and may warrant further investigation.

H. Public Facing Summary

Following the filing of 2018 Service Quality and Reliability reports, the Commission ordered Xcel, MP, and OTP to, “consult with Commission staff to draft a brief summary of their annual service-quality and reliability metrics that is digestible and useable for general audiences and file it as an attachment to their next annual report due April 1, 2020⁵⁹.” In Staff’s comment period notice, comments were directed towards this public facing summary specifically, if information was “digestible for members of the general public,” the need for additional information, and potential methods for distribution⁶⁰. The same project was initiated for the gas service quality reports at the Commission’s February 28, 2019 meeting. Each investor owned electric utility submitted their version of the required public facing summary (see below).

PUBLIC REPORT	Xcel	MN Power	Ottertail Power
Reliability	5	5	5
Service Quality	1	2	4
Promote : Help	6:0	7:2	7:1

Each electric IOU submitted their version of the required public facing summary. data refer to the number of paragraphs in the summary related to each topic. The last row shows the ratio of promoting utility performance versus customer assistance.

The Department commented that the public facing documents had provided the required information (OTP and MP) and additionally, that information was digestible for public audiences (Xcel)⁶¹. Only MP responded to the Department stating that their summary content was sufficient but that they were open to input on distribution methods (though noting a prioritization of immediate concerns like outages) as well as making the report more digestible for the public (noting they would follow up in their Rely Comments but failing to do so)⁶².

The Department’s Reply Comments and Response to Reply Comments to Xcel did not discuss the public facing summary. More, no other stakeholders commenting in the present docket gave feedback on the utilities’ public facing summary reports: Fresh Energy (no feedback);

⁵⁷ Otter Tail Power 2019 Annual Safety, Reliability, and Service Quality Report PDF p65 (April 1, 2020).

⁵⁸ Xcel Energy 2019 Annual Safety, Reliability, and Service Quality Report p57 (April 1, 2020).

⁵⁹ Order in the Matter of Annual Report on Safety, Reliability, and Service Quality for 2018 (January 28, 2020).

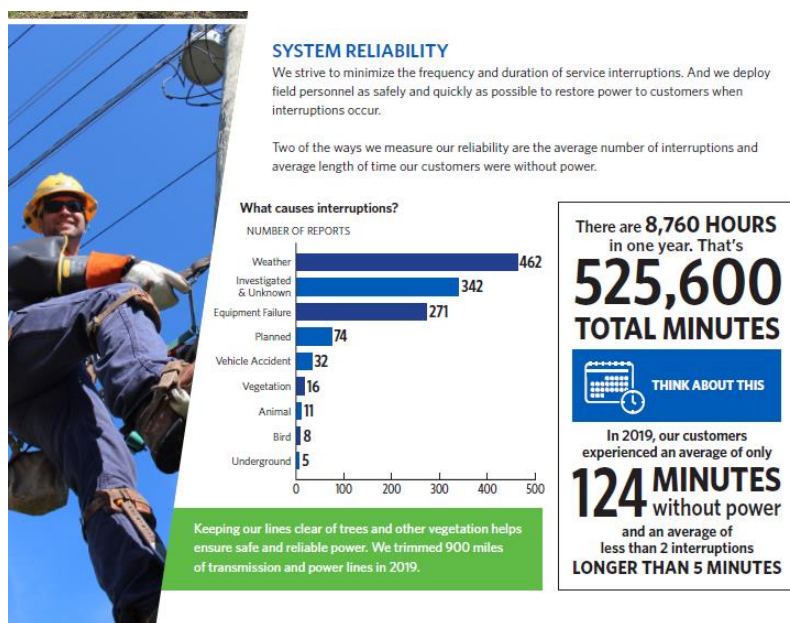
⁶⁰ Notice of Comment Period for 2019 Service Quality & Reliability reports (April 20, 2020).

⁶¹ Department Comments for OTP (p28; August 12, 2020); MP (p14; August 12, 2020); Xcel (p7; August 19, 2020).

⁶² MP Comments p2 (August 12, 2020).

ELPC/VS (none); SRA (none); City of Mpls (none). Most comments, instead, were focused on Xcel’s compiling and presentation of equity in locational reliability and customer service.⁶³

To this extent, comments did not suggest additional content or plans for distribution. Staff believes the potential for the public facing reports is underrealized if they are left in their current state. The reports are presented without a clear distribution plan, do not present numbers in context (e.g. related to total customers), and lack actionable steps, like how customers can seek help.



A snapshot of a portion of Otter Tail Power’s 2019 Public Facing Summary Report.

CONCLUSION

"The Department recommends that the Commission accept OTP’s Annual Report as the Company has provided the required information.⁶⁴"

"The Department recommends that the Commission accept Minnesota Power’s 2019 Service Quality Report, and maintain the 2019 performance goals in 2020.⁶⁵"

⁶³ The Commission’s April 20, 2020 Notice & Staff Proposal in Attachment A

⁶⁴ Department Comments for Otter Tail Power p27 (August 12, 2020).

⁶⁵ Department Comments for Minnesota Power p13 (August 12, 2020).

RULE	STATUS for Xcel Energy
7826.1400	Fulfilled
7826.1500	“The Department asks that Xcel provide some additional information as to the significant increase in the number of customers entering payment plans in 2019 in its Reply Comments (p28).”
7826.1600	Fulfilled
7826.1700	“In our comments in Xcel’s 2019 Gas Service Quality Report (Docket No. G002/M-20-460) we noted that the average speed of answer for agent-only calls had increased from 22 seconds in 2018 to 27 seconds in 2019. The Department asked that Xcel explain that increase in its Reply Comments in that proceeding. We would ask that Xcel Electric provide that same information in this proceeding in its Reply Comments (p29).”
7826.1800	Fulfilled
7826.1900	Fulfilled
7826.2000	Fulfilled

In its comments (above table), the Department required further information from Xcel Energy⁶⁶. Replies have been included in this brief. On October 6, then Department concluded that Xcel had met all reporting requirements and recommended the Commission accept Xcel’s 2019 SQ report but asked, “that the Company discuss its efforts to improve the reliability of its Customer Resource System in its 2020 Annual Service Quality Report⁶⁷.”

III. Staff Analysis

a. Utility Performance

Utility reporting fulfilled service quality requirements apart from portions of Xcel Energy’s Call Center data and payment plan enrollment. The Company provided clarification on both accounts. The Commission can accept the 2019 Service Quality and Reliability reports in **decision option 1**.

With respect to Call Center data, Xcel was requested to provide clarification related to the increase in the average speed of answer for agent-only calls. The Company provided this response. However, the Department found that response to call center response time to be unsatisfactory.

More, Staff requested additional explanation of call center practices related to use of IVR in the calculation of response time. Rule 7826.1200 states that the call center response time reported should only reflect agent answered calls, “*If the utility uses an automated call-processing system, the 20-second period begins when the customer has selected a menu option to speak to a live operator or representative.*” Staff is concerned because the automatic answer provided by IVR may artificially inflate the percent of calls answered within 20 seconds because IVR would

⁶⁶ Department Comments for Xcel Energy p25-31 (August 19, 2020).

⁶⁷ Department Response to Reply Comments for Xcel Energy p9 (October 6, 2020).

answer calls right away and is “a tool that provides quick and easy transactions for customers without having to speak to a customer service representative⁶⁸.” Xcel does include IVR in the times they report in their annual report. However, Xcel’s response did not provide clarity. The Company’s response indicates that they are doing things as they have always done. The Commission may request Xcel provide additional information about their call center reporting (e.g. to report only those calls answered by agents and to gauge compliance with rule 7826.1200 &.1700 based on those data OR verify that response time begins counting for IVR-answered only after a customer has elected to speak to an agent) and about their call center response time in **decision option 15**.

Though utilities have *reported* the required information, some service quality rules do not scrutinize utility performance. Thus, in the following text Staff analyzes performance trends for rules where no service goal has been set. The Commission may choose to investigate some of these trends. Pathways to investigate these some of these trends are presented in additional decision options.

.1400 REPORTING METER-READING PERFORMANCE NONE

.1500 REPORTING INVOLUNTARY DISCONNECTIONS

Despite high approval of Cold Weather Rule requests, Staff found it useful to visualize how many customers take advantage of this protection. Considering the relatively small percent of customers who are enrolled in CWR (less than 8% for each of the IOUs in 2019), the Commission may wish to monitor this percentage and ascertain its meaning. The CWR protection by itself does not provide financial assistance, just temporary relief from disconnection. The low percentage could indicate that people are receiving financial assistance and do not need the protection of the CWR, or it could mean that some customers are not aware of the protection. Elsewhere in this docket (Emergency Medical Status in Rule 7826.1800), utilities are developing customer outreach plans. Staff does not believe formal action needs to be taken, but it would be informative for the Commission to continue to monitor CWR enrollment and revisit the measure next year, if needed.

.1600 REPORTING SERVICE EXTENSION REQUEST RESPONSE TIMES NONE

.1700 REPORTING CALL CENTER RESPONSE TIMES

Existing reporting metrics for call centers require utilities to report call volume and call answer speed. However, with the advent of self-service and interactive communication platforms (like social media and email), Staff reiterates the perspective that the rules are not keeping up with technology⁶⁹. As a first step towards reporting additional metrics, Staff sent information requests to all three utilities to understand the feasibility of reporting additional data.

Especially critical is the reporting on these additional customer touchpoints by Xcel Energy. The Company’s reduction of call center hours (docket 17-553) was predicated on a stated preference among customers for digital communication over a telephone call. In its request to

⁶⁸ Xcel Energy response to Information Request (September 30, 2020).

⁶⁹ Staff Brief for 2019 Annual Service Quality & Reliability report dockets p39 (December 12, 2019).

modify hours, Xcel acknowledged that the Commission would retain its “transparent oversight” regarding Call Center performance⁷⁰.

Utilities appeared receptive to Staff’s request. All three IOUs reported the ability to collect data on visits to their website and social media platforms as well as emails received. Xcel and MP (not OTP) could provide response time to emails sent to select email addresses and all three IOUs could categorize those emails by subject matter.

Existence of these data demonstrates that customers are connecting with their utility through platforms beyond the call center. Therefore, to acknowledge the multiple ways customers are choosing to interact with their utility, Staff suggests that monitoring additional means of communication. Based on initial data supplied, Staff suggests reporting:

- Yearly total number of website visits;
- Yearly total number of emails received;
- Categorization of email subject, including categories for emails related to assistance programs and disconnections.

Doing so would allow the Commission to track the ways that customers specifically reach out to their utilities for assistance. In next year’s service docket or in subsequent years, the Commission may also wish to examine the text used to respond to customers seeking assistance. In this way, utilities could share best practices and allow participants to comment on how customers are being messaged about assistance programs, perhaps providing insight as to how messaging might be increasingly effective.

Staff foresees analyzing these additional data alongside call center metrics under rule 7826.1700. **Decision option 16** will allow the Commission to require utilities to report on additional metrics in the 2020 service quality & reliability docket. Staff can analyze data to identify any trends that may prompt a change in utility practice.

.1800 REPORTING EMERGENCY MEDICAL ACCOUNT STATUS

The Commission ordered that, “*Utilities shall engage in a dialogue with Commission Staff and stakeholders on emergency-medical-account-status protection as outlined in Minn. Stat. § 216B.098, subd. 5, and reported under Minn. R. 7826.1800.*”⁷¹ This order reflected Staff conversations with social service representatives, many of whom were unaware of the existence of EMS protections⁷². All three electric IOUs and the Energy CENTS Coalition are developing outreach programs targeting hospital personnel and medical equipment vendors⁷³. The small percent of total customers requesting EMS as well as the medical implications of the COVID-19 pandemic may support such outreach and further, may warrant Commission efforts to promote the sharing of effective outreach strategies. The Commission may gain more information about these outreach efforts with **decision option 17**.

⁷⁰ Xcel Initial Filing Customer Communication Preferences p18 (July 14, 2017).

⁷¹ Commission Order pertaining to dockets 18-239, 247, and 250 (May 14, 2019)

⁷² As reported in Staff Briefing paper for docket 18-250 page 18 (filed 10 April 2019)

⁷³ For example, as reported in MP 2019 Annual Safety, Reliability and Service Quality Report p39 (April 1, 2020).

Staff acknowledges that additional information about EMS (reasons for approval and denial as well as outreach) has been ordered to be reported in docket 20-375⁷⁴. However, docket 20-375 is meant to discuss temporary relief for COVID-19, rather than serve as a repository for information into perpetuity. Staff would recommend the Commission consider the reporting of EMS data in service quality dockets, so to allow analysis of long-term trends. The Commission can redirect discussion of EMS outreach as well as the additional reporting on approvals and denials to the SQ docket with **decision option 17**. Alternatively, the Commission may wish to take no action on additional EMS reporting in the present docket and instead, leave that information in docket 20-375 to maintain a single record related to pandemic protections.

.1900 REPORTING CUSTOMER DEPOSITS

OTP requires deposits from a higher percent of their customers, compared to Xcel. Developing a deeper understanding of deposits is of interest to Staff, however, perhaps not as pressing presently, as the practice of requiring deposits has been suspended. Therefore, Staff wishes to note that in future SQR reporting or via a new docket, the Commission may wish to inquire about the ratio of average deposit size to customer bills. More, a spatial analysis may be of interest, showing location of deposits with an overlay of average income by census block. This would illustrate any patterns in deposits by location and as a portion of customer income.

.2000 REPORTING CUSTOMER COMPLAINTS

In subsequent service quality reporting, the Commission may choose to require Otter Tail Power to regularly break apart “other” into defined categories that include third-part meter readers. This is because the number of cities served by OTP whose meters are read by a third party is increasing. Additionally, complaints filed under Xcel’s “Inadequate Service” heading appear to impact the Company’s most vulnerable customers and may warrant further investigation. Further unpacking complaints can be accomplished with **decision option 18**.

Public Facing Summary

Staff suggest modification of the existing reports. In terms of reliability, Staff suggests utilities should report only Customers Experiencing Multiple and Lengthy Interruptions (CEMI and CELI) and when doing so, should situate those statistics in context so that they are relevant to a public audience. Staff believes Otter Tail Power has presented reliability metrics in a way that will be comprehensible for the public (see snapshot of OTP’s public facing summary). Both Xcel and Minnesota Power should put data into context in a similar manner as was done by OTP. Additionally, Xcel should explain the causes of interruptions (like OTP and MP).

As shown in the Public Facing Summary Contents table above, each utility placed a disproportionate focus on reliability. To augment the service quality portion of the public facing reports, Staff believes it would be important to include information on disconnections. The disconnection information would be followed by the assistance programs offered by utilities including percent of customers enrolled in cold weather rule protections, emergency medical accounts status, and payment plans as well as information on how to enroll for any customers who may need assistance.

⁷⁴ Commission Order in docket 20-375 (August 13, 2020).

With respect to distribution, the SRA mentions that utilities should prioritize communication (especially of outages) in Energy Poverty areas⁷⁵. Perhaps these criteria could apply to all public communication messages. Also, Staff suggests that links to public facing materials could be placed on the utilities' and Commission's websites. Addressing issues with related to the IOUs' public facing summary reports can be done with **decision option 19**.

⁷⁵ SRA Reply Comments p 8 (September 2, 2020).

IV. Decision Options (Combined from Vol 1 – Vol 3)

1. Accept Xcel Energy’s, Otter Tail Power’s, and Minnesota Power’s annual Safety, Service Quality, and Reliability reports for 2019. (*Department, OTP, MP, Xcel*)

Volume 1 (Reliability)

2. Require the utilities to make a compliance filing, within 30 days of the order, with data as follows: (*Staff*)
 - a. Xcel Energy: causes of sustained customer outages, by service center for 2019, as a spreadsheet, (.xlsx).
 - b. Minnesota Power:
 - i. interruptions to the bulk power system for 2019
 - ii. causes of sustained customer outages, by service center for 2019, as a spreadsheet, (.xlsx);
 - iii. The highest number of interruptions experienced by any one customer (or feeder, if customer level is not available).
 - iv. The longest experienced interruption by any one customer (or feeder, if customer level is not available).
3. Require Xcel Energy to continue quarterly status reports on efforts to improve reliability in the Southeast Work Center. (*Staff*)
4. Grant a variance to MN Rule 7826.0500 Subpart 1.G. for Minnesota Power, Otter Tail Power, and Xcel Energy. Require utilities to file a summary table that includes the information contained in the reports, similar to Attachment G in Xcel’s filing.
5. Require utilities to provide the reliability (SAIDI, SAIFI, CAIDI, MAIFI, normalized/non-normalized) for feeders with grid modernization investments such as Advanced Metering Infrastructure (AMI) or Fault Location Isolation and Service Restoration (FLISR), to the historic 5-year average reliability for the same feeders before grid modernization investments.

Minnesota Power

6. Set Minnesota Power’s 2020 Reliability Standard at the IEEE benchmarking 2nd Quartile for medium utilities. Require a supplemental filing to Minnesota Power’s 2020 SQSR report 30 days after IEEE publishes the 2020 benchmarking results, with an explanation for any standards the utility did not meet. (*Staff*)
7. Set Minnesota Power’s Reliability Standards for 2020 at the levels described below. (*MP*)

	SAIDI	SAIFI	CAIDI
IEEE Benchmarking Average	124.8	1.12	109.80

8. Set Minnesota Power’s Reliability Standards for 2020 at the 2016 levels. *(Department)*

	SAIDI	SAIFI	CAIDI
2016 Standard	98.19	1.02	96.26

Otter Tail Power

9. Set Otter Tail Power’s 2020 statewide Reliability Standard at the IEEE benchmarking 2nd Quartile for medium utilities. Require a supplemental filing to Otter Tail Power’s 2020 SQSR report 30 days after IEEE publishes the 2020 benchmarking results, with an explanation for any standards the utility did not meet. *(Staff)*

10. Set Otter Tail Power’s Reliability Standards for 2020 at the following levels. *(OTP)*

	SAIDI	SAIFI	CAIDI
All MN Customers	94.00	1.00	94.00

11. Set Otter Tail Power’s Reliability Standards for 2020 at the following levels. *(Department)*

Work Center	SAIDI	SAIFI	CAIDI
Bemidji	70.64	1.26	56.06
Crookston	69.33	1.19	58.26
Fergus Falls	55.97	1.11	60.33
Milbank	75.49	1.82	41.48
Morris	55.78	1.01	55.23
Wahpeton	57.24	1.13	50.65

Xcel Energy

12. Set Xcel Energy’s 2020 statewide Reliability Standard at the IEEE benchmarking 2nd Quartile for large utilities. Require a supplemental filing to Minnesota Power’s 2020 SQSR report 30 days after IEEE publishes the 2020 benchmarking results, with an explanation for any standards the utility did not meet. *(Staff)*

13. Set Xcel Energy’s Reliability Standards for 2020 at the following levels. *(Xcel)*

	SAIDI	SAIFI	CAIDI
Statewide	109	0.99	111

14. Set Xcel Energy’s Reliability Standards for 2020 at the following levels. (*Department*)

Work Center	SAIDI	SAIFI	CAIDI
Metro East	89.78	0.84	103.94
Metro West	79.37	0.79	100.37
Northwest	85.86	0.75	113.01
Southeast	94.82	0.76	122.04

Volume 2 (Service Quality)

- 15. Require Xcel Energy further clarify call center data in their 2020 SQSR Reports. Specifically, discuss the Company’s efforts to improve the reliability of its Customer Resource System⁷⁶ (*DOC*) and explain why IVR is included in reporting for calls answered within 20 sec threshold. (*Staff*)
- 16. Direct utilities to report the following in their service quality reports due April 1, 2021:
 - a. Yearly total number of website visits;
 - b. Yearly total number of emails received;
 - c. Categorization of email subject, including categories for emails related to assistance programs and disconnections as part of reporting under rule 7826.1700. (*Staff*)
- 17. Require a compliance filing within 30 days from the date of the Order from each utility in which engagement plans related to Emergency Medical Account status are explained. (*Staff*)
- 18. Direct utilities, after consultation with Department and Commission staff, to file revised categories for reporting complaint data. Delegate authority to the executive secretary to approve additional report categories, with the goals of having them in place by the April 1, 2021 report filing. (*Staff*)
- 19. Delegate authority to the Executive Secretary to approve Xcel’s, MP’s, and OTP’s public facing summaries. As part of this approval, Staff may communicate with utilities and stakeholders to refine the language and content in the summaries. (*Staff*)

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- 20. Xcel shall file the information listed in the revised Attachment A with its Safety, Service Quality, and Reliability report due April 1, 2021. (*Staff*)
- 21. Delegate authority to the executive secretary to convene one or more technical workshops to further develop the record, and to issue notices as appropriate. (*Staff, Department, Xcel*)
- 22. Adopt Fresh Energy’s recommendations as outlined in Attachment B (*Fresh Energy*)
- 23. Take some other action

⁷⁶ Department’s Response Comments to Xcel Energy p5 (October 6, 2020).