

June 3, 2025

Will Seuffert
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

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

Dear Mr. Seuffert:

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

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

The Report was filed by Xcel Energy (Xcel) was filed by on April 1, 2025.

The Department recommends approval with modifications and compliance filing requirements and 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

Minnesota Rules chapter 7826 and Commission Orders set standards and reporting requirements for Minnesota regulated utilities annual Safety, Reliability, and Service Quality (SRSQ) Reports. At the November 7, 2024, agenda meeting, the Commission heard the 2023 Annual SRSQ reports. The January 13, 2025 Order set additional reporting requirements for the utilities in their 2024 Annual SRSQ reports.¹ In addition to other reporting requirements, Xcel was required to make two proposals for utilizing its Advanced Metering Infrastructure (AMI) system's remote reconnection capabilities to restore power for involuntarily disconnected residential customers during summer weather events.² Xcel submitted a proposal for remote reconnection during extreme heat events and high air quality alerts in its April 1, 2025 SRSQ report.³

This docket also raises important questions about how Xcel's customers are realizing the benefits of its investments in advanced metering infrastructure (AMI), including the ability to disconnect and reconnect customers remotely when health and safety is at risk. At issue herein is Xcel's ability for remote reconnection of involuntarily disconnected customers during extreme heat events and poor air quality alerts, as well as the suspension of disconnections during the same events.⁴

II. PROCEDURAL BACKGROUND

July 26, 2024

The Commission posted a notice of comment period regarding actions it should take in relation to Xcel's Interactive Service Quality Map and Equity Analysis in Docket E002/M-24-25.⁵

¹ *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").

² 2023 SRSQ Order at Order Points 24 and 32.

³ *In the Matter of Northern States Power Company's Annual Report on Safety, Reliability, and Service Quality for 2024; and Petition for Approval of Electric Reliability Standards for 2025*, Part 3 of 3: Order Compliance, Xcel Energy, April 1, 2025, Docket No. E002/M-25-27, (eDockets) [20254-217138-05](#), (hereinafter "Part 3: Order Compliance") at 94-101.

⁴ *In the Matter of Northern States Power d/b/a Xcel Energy – Electric's 2024 Annual Safety, Reliability, and Service Quality Report*, Notice of Comment Period, April 7, 2025, Docket No. E002/M-25-27, (eDockets) [20254-217296-01](#) (hereinafter, 2025 Notice).

⁵ *In the Matter of Xcel Energy's Interactive Service Quality Map and Equity Analysis*, Notice of Comment Period, July 26, 2024, Docket No. E002/M-24-27, (eDockets) [20247-208994-01](#).

August 27, 2024	Comments were filed by multiple intervenors, ⁶ the Office of the Attorney General Residential Utilities Division (OAG-RUD) and the Department of Commerce, Division of Energy Resources.
September 12, 2024	Reply comments filed. The Department requested a supplemental comment period.
September 13, 2024	The Commission posted a notice of comment period for supplemental comments.
September 23, 2024	The Company and the Department submitted supplemental comments.
October 14, 2024	The Company and the Department submitted supplemental reply comments.
January 13, 2025	Commission issued Order “Accepting Reports and Setting Additional Requirements” which required Xcel to propose a plan to restore power to involuntarily disconnected customers with AMI during a heat advisory, an excessive heat warning, high air quality index alerts have been issued. ⁷
April 7, 2025	The Commission issued the present Notice in Docket No. E002/M-25-27 following the filing of Xcel’s 2024 SRSQ report. ⁸

III. DEPARTMENT ANALYSIS

A. REMOTE RECONNECTIONS DURING EXTREME HEAT

The Department finds that Xcel has structured its proposal regarding extreme heat reconnections as ordered by the Commission in its 2023 SRSQ Order at Order Point 24:

Xcel must propose a plan, in its 2024 safety, reliability, and service quality report due April 1, 2025, to restore power for involuntarily disconnected customers with AMI during a heat advisory or excessive heat warning, issued by the National Weather Service and to inform the Commission’s consumer affairs office and customers of its plans to restore power for

⁶ The list included: 1) Citizens Utilities Board (CUB); 2) Energy Cents Coalition (ECC); 3) Fresh Energy; 4) Cooperative Energy Futures; 4) Environmental Law and Policy Center; 5) Sierra Club; 6) Vote Solar; 7) City of Minneapolis; 8) City of Edina and 9) Sierra Club North Star Chapter.

⁷ *In the Matter of Xcel Energy’s 2023 Annual Safety, Reliability and Service Quality Report, Order Accepting Report and Setting Additional Requirements*, January 13, 2025, Docket No. E-002/M-24-27, (eDockets) [20251-213880-01](#) at order points 24 and 32 (hereinafter “2023 SRSQ Order”).

⁸ 2025 Notice.

involuntarily disconnected customers with AMI during extreme heat events.⁹

In compliance with Minn. Stat. § 216B.0975, Xcel already suspends disconnection of residential services of affected residents when an excessive heat watch, heat advisory, or excessive heat warning is issued by the National Weather Service (NWS).¹⁰ As such, the Department concludes that Xcel's plan to reconnect customers using the same alert system provided by the NWS is a reasonable expansion of Xcel's services and is in compliance with the Commission's 2023 SRSQ Order. The Department recommends the Commission approve Xcel's plan to reconnect customers with AMI during a heat advisory or excessive heat warning issued by the NWS and to inform the Commission's consumer affairs office and customers of its plans to restore power for involuntarily disconnected customers with AMI during extreme heat events.

*B. REMOTE RECONNECTIONS DURING POOR AIR QUALITY EVENTS
SUSPENDING DISCONNECTIONS DURING POOR AIR QUALITY EVENTS*

B.1. Reasonable threshold

The Department did not offer a recommendation for a reasonably "high" AQI threshold at which Xcel should initiate remote reconnections and suspend disconnections in its initial comments. However, after discussions with parties in the docket, and additional internal analysis, the Department concludes that an AQI of 151 is a reasonable threshold to qualify as "high" as ordered in the Commission's 2023 SRSQ Order:

Xcel must propose a plan, as part of its with its 2024 safety, reliability, and service quality report due on April 1, 2025, to restore power for involuntarily disconnected customers with AMI when high air quality index alerts have been issued.¹¹

The Department was initially concerned that the threshold of 151 AQI would be too high to capture Xcel's most vulnerable, as one step lower is an alert from 101 to 150 on the index entitled "Unhealthy for Sensitive Groups."¹² The Citizens Utility Board of Minnesota ("CUB") and Energy CENTS Coalition ("ECC") have cited in comments in Docket No. E002/M-24-27, that customers that are particularly susceptible to poor air quality, most likely due to a medical condition or their dependence on medical equipment, can apply for additional service protections using Xcel's "Medically Necessary Equipment & Emergency Certification Form."¹³ With this additional level of protection for particularly vulnerable

⁹ 2023 SRSQ Order, at order point 24.

¹⁰ Part 3 of 3: Order Compliance, at 94-95.

¹¹ 2023 SRSQ Order, at order point 32.

¹² AirNow. Air Quality Index (AQI) Basics, Retrieved from: [AQI Basics | AirNow.gov](https://www.airnow.gov/aqi/aqi-basics/)

¹³ *In the Matter of Northern States Power Company d/b/a Xcel Energy's 2023 Annual Safety, Reliability, and Service Quality Report*, Initial Comments of the Joint Commenters, June 14, 2024, Docket No. E002/M-24-27, (eDockets) [20246-207715-01](#), at 3. AND *In the Matter of Northern States Power Company d/b/a Xcel Energy's 2023 Annual Safety, Reliability, and Service*

customers, the Department is more comfortable recommending a threshold for the Company to initiate its proposed protections.

Furthermore, the Department concurs with CUB, the Legal Services Advocacy Project (“LSAP”), and the ECC, and the Office of the Attorney General – Residential Utilities Division (OAG) in disagreement with Xcel’s proposal to implement one AQI threshold for suspending disconnections and another, higher still, AQI threshold for reconnections in the event of particularly poor air quality.¹⁴ If the Company utilizes a higher threshold for initiating remote reconnections, the Department is concerned that the health and safety of not only Xcel’s most vulnerable customers, but at an AQI of over 201 (“Very Unhealthy” AQI alert category), as Xcel proposes,¹⁵ even an average customer may be at risk for severe health consequences.

However, the Department continues to hold its recommendation from initial comments that Xcel should coordinate with agencies such as the Minnesota Department of Health (“MDH”) and the Minnesota Pollution Control Agency (“MPCA”) toward further record development.¹⁶ Given the severity of potential consequences of poor air quality and extreme heat on Xcel’s most vulnerable customers, it is critical to set an appropriate threshold and to ensure proper communication statewide in a time of evolving climate and health data. The MDH letter filed in the present docket states that:

“...establishing a single threshold AQI value for initiating electrical power reconnections and suspending disconnections in cases of non-payment during the summer months may be inadequate for protecting public health, particularly in the case of wildfire smoke. Research is emerging to indicate that wildfire smoke may be as much as 10 times more toxic than air pollution from fossil fuel combustion,¹⁷ and many states are considering reevaluating AQI thresholds used to indicate dangerous conditions, especially for outdoor workers.^{18”}¹⁹

Furthermore, MDH reiterates that although poor air quality and extreme heat carry negative consequences for everyone, several populations are more susceptible to harm than the general

Quality Report, Reply Comments of the Joint Commenters, June 24, 2024, Docket No. E002/M-24-27, (eDockets) [20246-207903-02](#) at 6

¹⁴ *In the Matter of Northern States Power Company d/b/a Xcel Energy’s Electric 2024 Annual Safety, Reliability, and Service Quality Report*, Initial Comments of CUB, LSAP, and ECC, May 9, 2025, Docket No. E002/M-25-27, (eDockets) [20255-218760-01](#). AND *In the Matter of Northern States Power Company d/b/a Xcel Energy’s Electric 2024 Annual Safety, Reliability, and Service Quality Report*, Initial Comments of OAG, May 9, 2025, Docket No. E002/M-25-27

¹⁵ Part 3 of 3: Order Compliance at 97.

¹⁶ *In the Matter of Northern State Power Company d/b/a Xcel Energy – Electric’s 2024 Annual Safety, Reliability, and Service Quality Report*, Department Initial Comments, May 9, 2025, Docket No. E002/M-25-27, (eDockets) [20255-218769-01](#), at 7.

¹⁷ <https://news.stanford.edu/stories/2025/01/assessing-wildfire-health-risks>

¹⁸ <https://insideclimatenews.org/news/19052025/california-wildfire-air-pollution-farmworker-safety/>

¹⁹ *In the Matter of Northern States Power Company d/b/a Xcel Energy’s Electric 2024 Annual Safety, Reliability, and Service Quality Report*, Minnesota Department of Health Letter, May 30, 2025, Docket No. E002/M-25-27, (eDockets) [20255-219361-01](#) (hereinafter “MDH Letter”) at 4.

population.²⁰ The MDH notes harm to those with health concerns, as discussed elsewhere in the record (such as those over age 65, people who are pregnant, people with disabilities and/or preexisting conditions), but also calls particular importance to recognizing the harms of poor air quality and extreme heat on both historically marginalized communities due to systemic racism as well as communities that may also experience income disparities:

“It is also critically important to recognize that communities that have been historically marginalized due to systemic racism and health inequities have been and continue to be disproportionately impacted by cumulative exposure to pollution and other environmental hazards.²¹ These communities may also experience income disparities making them more vulnerable to the cost burdens of electric power, and thus, more likely to benefit from policies initiating electrical power reconnections and suspending disconnections during extreme heat and poor air quality events.”²²

Overall, the Department continues to recommend additional record development toward a permanent AQI threshold at which to initiate reconnections and suspend disconnections. The Department concludes that initiating reconnections and suspending disconnections in instances of poor air quality are crucial tools to ensuring health and safety of Xcel’s customers and understands the need to move quickly on implementing these tools. As such, the Department recommends the Commission require Xcel to both suspend disconnections and initiate reconnections for involuntarily disconnected customers when air quality exceeds an AQI of 150. The Department also recommends that the Commission require Xcel to consult with MPCA, MDH, the Department and parties to the docket to (1) establish common terminology and definitions regarding poor air quality and extreme heat, (2) establish appropriate thresholds related to poor air quality, extreme heat; and revise its proposals based on those determinations. The Department also recommends the Commission require Xcel to inform the Commission’s Consumer Affairs Office and customers of its plans to suspend disconnections and to restore power for involuntarily disconnected customers with AMI during poor air quality events.

The Department intends for its recommendations to set an AQI threshold for initiating reconnections and suspending disconnections in the interim while additional coordination and data collection is occurring among agencies and stakeholders. As a result of the coordination, the Company could later propose revised thresholds for air quality and extreme heat to be evaluated by the PUC and stakeholders.

In its letter, the MDH “commits to partner with the MPCA, PUC, and industry, to establish terminology and definitions regarding extreme heat and poor air quality, and appropriate thresholds for initiating electrical power reconnections and suspending disconnections.”²³

²⁰ *Ibid.*

²¹ <https://www.pca.state.mn.us/air-water-land-climate/the-air-we-breathe-report>

²² MDH Letter, at 4

²³ MDH Letter, at 3.

C. START DATE FOR BOTH PROPOSALS

As discussed in the Department's initial comments²⁴ and the comments of other parties, such as CUB, LSAP and ECC, and the OAG,²⁵ Xcel's proposed implementation timeline is unreasonable. The Department supports the discussion in the comments of CUB, LSAP and ECC that implementation by May 1, 2026, would be a much more reasonable timeframe given that excessive heat and poor air quality events are most prevalent in the warmest months of the year.²⁶

The Department recommends that the Commission require Xcel to implement its excessive heat and air quality protections, including initiating reconnections and suspending disconnections, by May 1, 2026, at the latest.

D. OTHER ISSUES

D.1. Communication and Outreach Plan

The Department supports the comments of CUB, LSAP and ECC regarding the importance of a communication and outreach plan to notify customers of Xcel's extreme heat and air quality protections. As discussed above, the Department believes Xcel's "Medically Necessary Equipment & Emergency Certification Form" is a vital, parallel tool to the proposed excessive heat and air quality protections. The Department recommends the Commission require Xcel to submit a compliance filing within 60 days of the publication of the Order in this docket detailing its communication and outreach strategies for informing customers of extreme heat and air quality protections including the availability and protections of its "Medically Necessary Equipment & Emergency Certification Form."

Furthermore, the Department supports the compliance filing recommendation of the OAG given the unsubstantiated nature of Xcel's preliminary cost estimates. The Department recommends the Commission require Xcel to make a compliance filing within 30-days of the Commission's order, with more developed and supported cost estimates, to include the items included in the OAG's initial comments.²⁷

D.2. Reporting

The Department supports the recommendation of CUB, LSAP and ECC regarding the need for reporting on Xcel's extreme heat and air quality protections.

The Department recommends the Commission Require Xcel to include in future annual SRSQ reports (1) the number of extreme heat and air quality events called; (2) the number of customers eligible for extreme heat and air quality protections during each event; and (3) the number of customers whose

²⁴ Department Initial Comments, at 5.

²⁵ Initial Comments of the OAG, at 10-12.

²⁶ Initial Comments of CUB, LSAP, and ECC, at 6-7.

²⁷ Initial Comments of the OAG, at 17-19 (section III.C.)

disconnections were suspended or who were ultimately reconnected during each event. Such information will be provided both in aggregate and by county and be incorporated into the Company's service quality map to the extent feasible.²⁸

IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of Xcel's proposal 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. REMOTE RECONNECTIONS DURING EXTREME HEAT

The Department recommends the Commission approve Xcel's plan to reconnect customers with AMI during a heat advisory or excessive heat warning issued by the NWS and to inform the Commission's Consumer Affairs Office and customers of its plans to restore power for involuntarily disconnected customers with AMI during extreme heat events.

B. REMOTE RECONNECTIONS DURING POOR AIR QUALITY EVENTS SUSPENDING DISCONNECTIONS DURING POOR AIR QUALITY EVENTS

B.1. The Department recommends the Commission require Xcel to both suspend disconnections and initiate reconnections for involuntarily disconnected customers when air quality exceeds an AQI of 150.

B.1. The Department also recommends that the Commission require Xcel to consult with MPCA, MDH, the Department and parties to the docket to (1) establish common terminology and definitions regarding poor air quality and extreme heat, (2) establish appropriate thresholds related to poor air quality, extreme heat; and revise its proposals based on those determinations.

B.1. The Department also recommends the Commission require Xcel to inform the Commission's Consumer Affairs Office and customers of its plans to suspend disconnections and to restore power for involuntarily disconnected customers with AMI during poor air quality events.

C. START DATE FOR BOTH PROPOSALS

The Department recommends that the Commission require Xcel to implement its excessive heat and air quality protections, including initiating reconnections and suspending disconnections, by May 1, 2026, at the latest.

D. OTHER ISSUES

D.1. The Department recommends the Commission require Xcel to submit a compliance filing within 60 days of the publication of the Order in this docket detailing its communication and outreach strategies

²⁸ Initial Comments of CUB, LSAP, and ECC, at 8.

for informing customers of extreme heat and air quality protections including the availability and protections of its “Medically Necessary Equipment & Emergency Certification Form.”

D.1. The Department recommends the Commission require Xcel to make a compliance filing within 30-days of the Commission’s order, with more developed and supported cost estimates, to include the items included in the OAG’s initial comments.²⁹

D.2. The Department recommends the Commission Require Xcel to include in future annual SRSQ reports (1) the number of extreme heat and air quality events called; (2) the number of customers eligible for extreme heat and air quality protections during each event; and (3) the number of customers whose disconnections were suspended or who were ultimately reconnected during each event. Such information will be provided both in aggregate and by county and be incorporated into the Company’s service quality map to the extent feasible.³⁰

²⁹ Initial Comments of the OAG, at 17-19 (section III.C.)

³⁰ Initial Comments of CUB, LSAP, and ECC, at 8.

CERTIFICATE OF SERVICE

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

Minnesota Department of Commerce
Comments

Docket No. E002/M-25-27

Dated this 3rd day of **June 2025**

/s/Sharon Ferguson

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