


## Staff Briefing Papers

Meeting Date	April 18, 2019	Agenda Item **6
Company	Northern States Power Company d/b/a Xcel Energy Minnesota Power Otter Tail Power Company	
Docket No.	<b>E015/M-18-250 In the Matter of Minnesota Power's 2017 Annual Service and Reporting Standards</b> <b>E017/M-18-247 In the Matter of Otter Tail Power Company's 2017 Annual Service and Reporting Standards</b> <b>E002/M-18-239 In the Matter of Xcel Energy's 2017 Electric Annual Service and Reporting Standards</b>	
Issues	Should the Commission accept Minnesota Power's, Otter Tail Power's, and Xcel Energy's Service and Reporting Metrics for 2017?  Should the Commission approve Minnesota Power's Reconnect Pilot Program?	
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 <b>Relevant Documents</b>	<b>Date</b>
<b>Xcel Energy (18-239)</b>	
Initial Filing – 2017 Annual Safety, Reliability, and Service Quality Report	March 30, 2018
Xcel Energy – Other, Corrected Attachment F	July 27, 2018
Department of Commerce – Comments	August 29, 2018

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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.

 <b>Relevant Documents</b>	<b>Date</b>
Xcel Energy – Reply Comments	September 10, 2018
<b>Otter Tail Power (18-247)</b>	
Initial Filing – 2017 Annual Safety, Reliability, and Service Quality Report	April 2, 2018
Department of Commerce – Comments	June 1, 2018
Otter Tail Power – Reply Comments	June 11, 2018
<b>Minnesota Power (18-250)</b>	
Initial Filing – Safety, Reliability, and Service Quality Standards Report and Appendix A	April 2, 2018
Energy Cents Coalition – Comments	July 30, 2018
Department of Commerce – Comments	August 1, 2018
Office of Attorney General – Comments	August 15, 2018
Legal Services Advocacy Project – Comments	August 16, 2018
Minnesota Power – Reply Comments and Attachments A - F	August 20, 2018
Citizens Utility Board and Minnesota Citizens Federation Northeast – Comments	August 20, 2018
Department of Commerce – Response to Reply Comments	September 10, 2018
Office of Attorney General – Response to Reply Comments	September 10, 2018
Energy Cents Coalition – Reply Comments	September 10, 2018
Minnesota Power – Letter - Scope of Work	January 14, 2019

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### I. Statement of the Issues

Should the Commission accept Minnesota Power’s, Otter Tail Power’s, and Xcel Energy’s Service and Reporting Metrics for 2017?

Should the Commission approve Minnesota Power’s Reconnect Pilot Program?

### II. Background

Minnesota’s Investor Owned Utilities (IOUs) submit Safety, Reliability, and Service Quality (SQR) Reports annually. For 2018, Commission staff split the reports into two sections that will be considered at two agenda meetings. The Safety and Reliability portion was before the Commission on the January 31, 2019 and now we 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.

Minnesota Rules 7826 requires a variety of reporting by the utilities. This set of briefing papers 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.

### III. Reporting Standards (Utility Service Quality Reports and Party Comments)

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.

Because staff is taking a renewed look at these service quality rules, staff has also included an explanation of the purpose of the rule, from the Commission's original 2002 SONAR (Statement of Need and Reasonableness). While staff is not suggesting that the Commission undergo a rulemaking, the Commission may wish to interpret its rules or look at service quality data differently than when it initially promulgated its rules 17 years ago.

#### A. Meter Reading Performance (7826.1400)

Text of Rule:

*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.*

PURPOSE OF RULE: These rules were issued in 2002, 17 years ago. At the time of this rulemaking, meters were likely to be read manually, making this an important metric to ensure adequate levels of meter reading and ensure accuracy of customer bills. Today, advances in metering technology likely make compliance with this rule easier. As listed in the Commission's SONAR (Statement of Need and Reasonableness) for these rules:

[These reporting requirements] give the Commission the information necessary to begin an analysis of any meter-reading deficiencies...because [they] track self-reading, a tool that both customers and utilities find convenient, but which can result in misreadings and difficult true ups...and how many customers have not had their meters professionally read for six to twelve months and why this is so. These are the cases most likely to cause hardship to consumers and losses to utilities. [Finally,] monitoring staffing levels is one tool among many that the Commission needs at its disposal to fulfill [its] legislative directive.

The Department found all three electric utilities to be in compliance with the Commission's meter reading frequency standard.<sup>1</sup>

### Xcel Energy

In addition to Attachment F with the initial report, Xcel filed a corrected version of Attachment F on July 27, 2018 and together these include the required information to fulfill this rule requirement.

There were 974 meters that went unread for twelve months or longer. Xcel reported these by customer class and the correlating cause, which may be found in the corrected Attachment F, pages 5 to 7.

Xcel's staffing levels for meter reading was supplied on page 18 of their report and included full time equivalent, no temporary staff, with a monthly average of 13.5 employees.

The Department provided historical data in their review of Xcel's meter data after noting that "[a]n annual average of 96.71 percent of customer meters were read by utility personnel and 0.0005 percent were read by the customer in 2017."<sup>2</sup> The Department affirmed that Xcel met the rule requirements in all months of 2017 and "that, in general, Xcel has continued to reduce the total number of meters not read for longer than 12 months."<sup>3</sup> The following tables supplied by the Department summarize the number of meters not read by utility personnel for six to 12 months and for 12 months or longer.

**Table 6: Meters Not Read for 6-12 Months<sup>20</sup>**

Year	Residential	Commercial	Industrial	Other	Total
2009	3,021	2,330	467	288	6,106
2010	3,506	1,076	338	100	5,020
2011	2,346	967	244	183	3,740
2012	3,967	1,232	248	106	5,553
2013	2,600	822	177	79	3,678
2014	5,237	1,178	260	123	6,798
2015	2,508	942	387	113	3,950
2016	2,268	772	167	75	3,282
2017	1,938	1,118	306	50	3,412

<sup>1</sup> Minn. Rules 7826.0900, subpart 1: *Meter reading performance standard. Utilities shall attempt to read all meters on a monthly basis unless otherwise authorized by the commission. Utilities are assumed to be in compliance with this standard if they read at least 90 percent of all meters during the months of April through November and at least 80 percent of all meters during the months of December through March. Utilities shall contact any customer whose bill has been estimated for two consecutive months and attempt to schedule a meter reading.*

<sup>2</sup> [Department Comments on Xcel Energy](#) at 20 (August 29, 2018).

<sup>3</sup> *Id.* at 21.

**Table 7: Meters Not Read for Longer than 12 Months<sup>21</sup>**

Year	Residential	Commercial	Industrial	Other	Total
2007	2,970	1,409	415	302	5,096
2008	3,604	1,776	440	263	6,083
2009	3,170	974	291	248	4,683
2010	1,149	366	263	71	1,849
2011	637	403	181	94	1,315
2012	661	450	112	89	1,312
2013	602	335	131	64	1,132
2014	620	304	92	68	1,084
2015	764	310	134	90	1,298
2016	551	240	109	63	963
2017	531	260	135	48	974

### Minnesota Power

Minnesota Power's (MP) metering network is comprised of about 55% Automatic Meter Reading (AMR) and 44% Advanced Metering Infrastructure (AMI) – with an additional six to eight percent deployed annually. The AMI has been integrated since 2011 with an Outage Management System (OMS), which provides real-time communication to service centers from the AMI system when power outages arise and when power has been restored. MP provided a breakdown of their meter equipment infrastructure in Table 4 of Appendix A, page 18 of their filing.

MP stated their personnel read, on average, the following meters:

Customer Class	Percentage Read
Residential Meters	98.63%
Commercial Meters	99.3%
Industrial, Municipal Pumping, and Lighting Meters	100%

Residential customer reads averaged at just .04% with MP receiving an average of 92.58% of the reads. Meanwhile, Commercial customer reads comprise .01% of their system with MP receiving 95.57% of those reads. Graphs are again provided on pages 21 to 22 of Appendix A. MP provided data regarding meter reads that exceeded six or more months where a total of seven meters were not accessible, six of which were resolved within seven months. Please see the table below supplied by MP and found on page 23 of Appendix A.

Finally, MP noted they currently have seven full time collectors and a temporary full time collector from April 17 to October 14.

The Department stated that “MP was successful in ensuring that each meter was read at least once” in 2017 and the information reflected that the standard has been met before it provided and table summarizing unread meters of 12 months and 12 months or more.<sup>4</sup>

The Department also noted that MP had met the threshold for Minnesota Rules, part 7826.0900, subp. 1 that requires utilities to read 90% of all meters April to November and 80% between December to March.

### **Otter Tail Power Company**

Otter Tail provided tables summarizing their meter reading performance for each customer class on pages 32-34 of their filing. Otter Tail’s system-wide totals for 2017 possessed a meter reading average of 96.4% for all meters and 1.5% for self-read.

No such events existed where an Otter Tail employee did not read a meter for a period of six months or greater. As can be seen in their table on page 35, Service Representatives Staffing levels at each customer service center were reported throughout the year with the average of 70 staff. In addition, Otter Tail noted they use a third party to read the Company’s meters in forty-seven cities within their Minnesota service territory.

The Department acknowledged the utility’s fulfillment with the requirements of this rule. While looking at historical data, the Department observed that Otter Tail Power has improved their system-wide meter reading performance over the years measured. Please see the table below furnished by the Department on page 19 of their comments.

	<b>Percent Read by OTP</b>	<b>Percent Read by Customer</b>	<b>Percent Not Read</b>
2005	92.2%	2.8%	5.0%
2006	92.9%	2.5%	4.6%
2007	93.4%	2.8%	3.9%
2008	93.8%	2.7%	3.5%
2009	94.1%	2.4%	3.5%
2010	94.4%	2.6%	3.0%
2011	95.1%	2.6%	2.3%
2012	95.9%	2.1%	2.0%
2013	95.8%	1.9%	2.3%
2014	95.9%	1.8%	2.4%
2015	95.9%	1.7%	2.4%
2016	96.4%	1.5%	2.2%
2017	96.4%	1.5%	2.2%

Finally, the Department confirmed that Otter Tail Power is in compliance with Minn. Rules, part 7826.0900, subp. 1. that requires utilities to read 90% of all meters April to November and 80%

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<sup>4</sup> [Department Comments on Minnesota Power](#) at 11-12 (August 1, 2018).

between December to March. “The information reported reflects that 94% of all meters each month during 2017.”<sup>5</sup>

**Table 5: Meters Not Read**

	Company Read		Customer Read	
	12 months	+12 months	12 months	+12 months
2008	1	8	0	0
2009	1	32	0	1
2010	0	0	0	1
2011	0	3	1	3
2012	7	3	1	3
2013	2	14	0	1
2014	4	8	0	0
2015	2	5	0	0
2016	6	12	1	0
2017	0	0	0	0

## B. Involuntary Disconnections (7826.1500)

Text of Rule:

*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.*

PURPOSE OF RULE: The Commission’s SONAR thoroughly articulated the purpose of these reporting requirements:

Filing requirement A is necessary and reasonable because it gives the Commission basic data about disconnection practices. The filing requirement focuses on how many customers receive disconnection notices, as opposed to how many customers are actually disconnected. This will permit the Commission to track how many customers with significant arrearages are able to avoid disconnection, providing some indication of a utility’s willingness to work with customers facing economic adversity. And it will provide the kind of baseline data on overall levels of consumer welfare that the Legislature often requests of the Commission.

<sup>5</sup> [Department Comments on Otter Tail Power Company](#) at 19 (June 1, 2018).



Filing requirement B is necessary and reasonable because it will permit the Commission to monitor utilities' administration of, and customers' use of, the Cold Weather Rule [ ]. The Cold Weather Rule is a central feature of Minnesota energy policy; the Commission has a duty to track its administration [ ].

Filing requirement C is necessary....to obtain accurate information on how many customers are disconnected throughout the course of the year by each utility. This information will enable the Commission to better evaluate the effects of current disconnection procedures and the effectiveness of current energy assistance programs.

Filing requirement D is necessary and reasonable because it provides key information on a utility's responsiveness to the needs of disconnected customers, as reflected in its success in reaching mutually agreeable payment arrangements. Unusually low numbers in this category could alert the Commission to a need for investigation or intervention.

### **Xcel Energy**

In Attachment G on page 1, Xcel reported data in table format that included the required metrics: customer disconnections, customers who sought cold weather rule protection and utility granting of protection, customer restoration to power within 24 hours, customer restoration to power with a payment plan, and medical account requests with the Company's correlating denials.

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. For customers who receive gas and electric service, a disconnect would be due to the total amount of regulated charges overdue. The Company's customer service system does not have the functionality to sort the data or track disconnects due to electric-only non-payment.

Another note made by Xcel concerning the requirement under Minn. R. 7820.2400 where the utility must send duplicate notices to multiple addresses for each disconnected customer did have an impact on their reported numbers. Numbers reflected include duplicates and does not separately count unique customer circumstances.

Based on the information reported, in 2017, there were:

- 826,147 disconnection notices sent to commercial (78,738) and residential (747,409) customers;
- 140,943 residential customers seeking cold weather rule protection and all were granted;
- 6,678 commercial (114) and residential (6,564) customers restored to service within 24 hours;
- 1,254 commercial (3) and residential (1,251) customers restored to service after a condition of payment;

The Department acknowledged Xcel’s fulfillment of the requirements of the rule and provided a table comparing historical residential involuntary disconnection and cold weather rule data.

**Table 8: Residential Customer Involuntary Disconnection Information<sup>22</sup>**

Year	Customers Receiving Disconnect Notice	Customers Seeking CWR Protection	Customers Granted CWR Protection	% Granted	Customers Disconnected Involuntarily	Customers Restored within 24 Hours	Customers Restored by Entering Payment Plan
2003	516,982	19,745	19,199	97%	27,004	6,303	1,350
2004	562,455	27,128	26,736	99%	28,172	5,912	1,240
2005	459,824	42,099	40,549	96%	18,846	3,596	309
2006	603,679	21,537	20,234	94%	22,684	10,498	479
2007	895,152	16,848	15,746	93%	27,427	9,578	827
2008	1,175,953	86,092	86,092	100%	28,863	11,449	727
2009	1,186,057	140,862	140,862	100%	29,612	11,214	1,253
2010	1,218,073	173,440	173,440	100%	29,592	12,121	1,265
2011	1,282,576	188,091	188,271	100%	27,120	11,273	1,446
2012	1,207,842	279,713	279,713	100%	27,132	11,010	1,047
2013	1,217,049	126,477	126,477	100%	23,493	9,221	882
2014	1,166,978	105,561	105,561	100%	25,532	10,283	1,250
2015	1,042,775	151,956	151,956	100%	26,756	11,556	1,201
2016	870,665	130,052	130,052	100%	20,574	7,698	1,512
2017	747,409	140,943	140,943	100%	19,212	6,564	1,251

### Minnesota Power

As summarized in Table 6 of MP’s report, there were 18,686 disconnection notices given in 2017 or about 13% of their customers. As is the case with other utilities, some accounts received multiple notices over the year. MP noted that about 14% or less of residential accounts received notices, 5% for commercial, and 4% of industrial accounts.

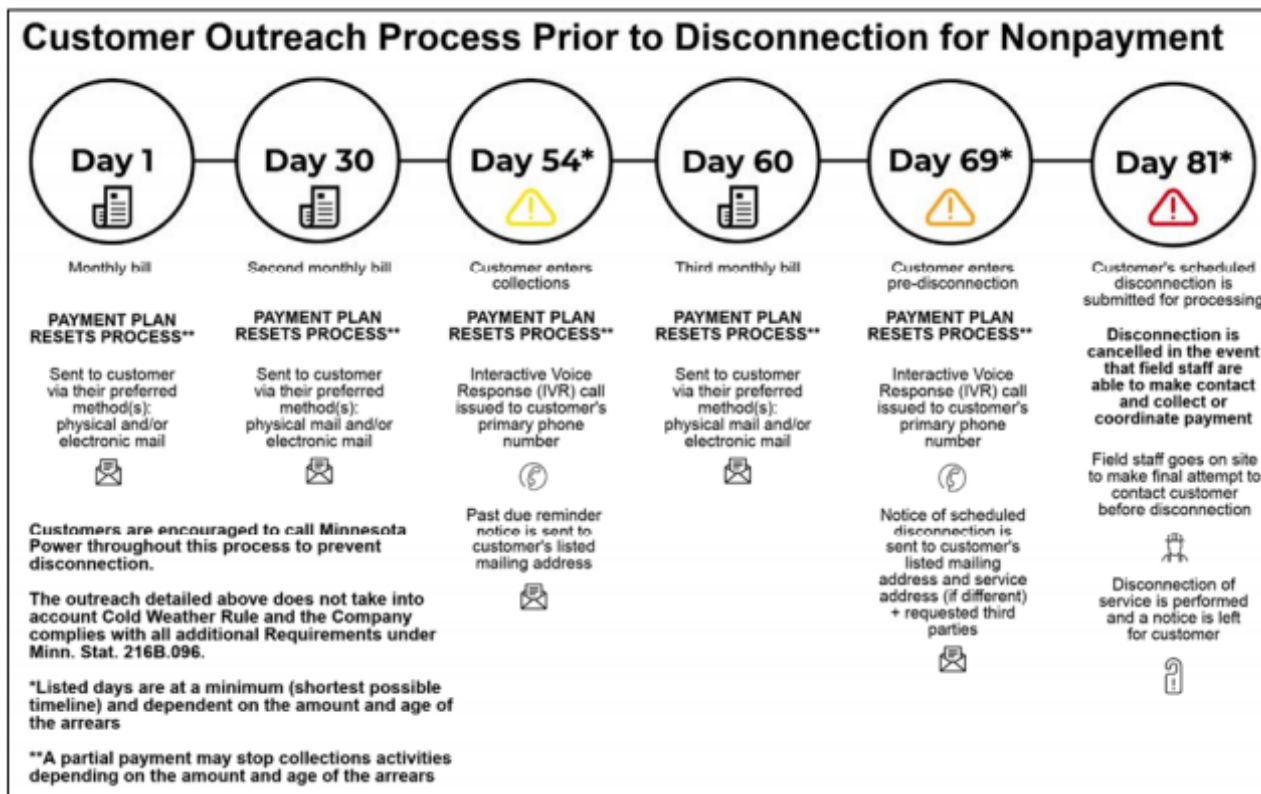
All customers seeking Cold Weather Rule protection in 2017 – 3,745 – were granted. The monthly breakdown is available in MP’s Table 7 on page 26 of Appendix A. MP stated that with the exception of income verification, they strongly adhere to the governing statute and work with customers to acceptable payment amounts that fit within their constraints.

About 2% of those customers who received disconnection notices were disconnected and nearly half were restored to service within 24 hours. MP has in place disconnection procedures that align with both disconnection rules and Cold Weather Rule. The utility “works with customers to identify payment option that are attainable while also working to keep account balances as current as possible and out of collections.”<sup>6</sup>

<sup>6</sup> [Minnesota Power Annual Safety, Reliability and Service Quality Report, Appendix A](#) at 28 (April 2, 2018).

Due to comments received by Energy Cents and other parties raising concerns about MP’s disconnection practices, MP also included in their reply comments the Company’s outreach process prior to disconnection for nonpayment. Please see the graphic below.

MP’s involuntary disconnection and power restoration totals for 2017 are 2,776 involuntary disconnections and nearly half (47%, 1,309) were restored within 24 hours.



The Department acknowledged MP’s fulfillment of the rule and provided tables summarizing the historical disconnection data since 2008, as well as another table with historical payment plan reconnections.

**Table 6: Residential Customer Involuntary Disconnection Information**

	Received Disconnect Notice	Sought CWR Protection	% Granted	Disconnected Involuntarily	Restored within 24 Hours	Restored by Entering Payment Plan
2008	33,889	1,746	100%	3,293	1,774	204
2009	33,129	1,429	100%	3,229	1,723	311
2010	35,526	1,698	100%	2,853	1,481	297
2011	37,647	3,465	99%	3,009	1,804	331
2012	37,837	3,227	99.8%	3,518	1,828	569
2013	40,451	2,617	99.8%	3,171	1,122	576
2014	35,796	2,852	100%	3,257	799	443
2015	22,537	2,173	100%	520	154	56
2016	12,191	2,916	100%	1,933	213	634
2017	17,454	3,475	100%	2,668	1,284	1,680

**Table 12: Use of Payment Plans to Restore Service to Disconnected Customers**

Year	Customers Disconnected	Customers Restored by Entering Payment Plan	Percentage of Customers Restored by Entering Payment Plan
2003	2010	120	6.0
2004	2042	41	2.0
2005	2279	64	2.8
2006	2315	83	3.6
2007	3038	171	5.6
2008	3293	204	6.2
2009	3229	311	9.6
2010	2853	297	10.4
2011	3009	331	11.0
2012	3518	569	16.2
2013	3171	576	18.2
2014	3257	443	13.6
2015	520	56	10.8
2016	1933	634	32.8
2017	2668	1680	63.0

As can be seen above and noted by the Department, there is an improvement in payment plan offerings, but an apparent inconsistency in data collection. “These data discrepancies were partially due to the dates recorded, partially due to one customer moving out and another moving in at the same location, and appear to largely be due to the new practice of including customers entering payment plans in Cold Weather Rule (CWR) months.”<sup>7</sup> Staff notes that these inconsistencies and other concerns are being addressed through the third party review discussed later in the briefing papers.

<sup>7</sup> [Department Comments on Minnesota Power](#) at 20 (August 1, 2018).

### Otter Tail Power Company

Involuntary disconnection notices sent among all customer classes in 2017 totaled 53,571, about a 1% increase from 2016. Otter Tail supplied a corrected table breaking down this information by customer class and month within their reply comments on page 2.

There were 817 customers who sought cold weather rule protection and all were granted. Otter Tail Power provided a monthly break down on page 36 of their filing.

The Department acknowledged Otter Tail's fulfillment of the requirements of this rule, but requested further details to address why the utility initially reported a much higher number of residential disconnection notices. When comparing the report to historical data, the amount was nearly double than 2016 figures. Otter Tail realized they mistakenly reported system-wide data and not Minnesota-only and furnished a corrected report.

	Received Disconnect Notice	Sought CWR Protection	Granted CWR Protection	% Granted	Disconnected Involuntarily	Restored within 24 Hours	Restored by Entering Payment Plan
2004	31,043	302	260	86%	679	201	22
2005	33,274	302	260	86%	1,008	351	22
2006	37,980	388	291	75%	873	295	54
2007	39,022	671	573	85%	1,293	416	61
2008	41,764	1,062	970	91%	973	289	28
2009	36,976	1,139	1,139	100%	1,069	432	40
2010	38,119	1,837	1,837	100%	1,122	428	44
2011	38,723	2,118	2,118	100%	1,168	506	38
2012	39,912	2,139	2,137	99.9%	745	558	29
2013	39,913	1,788	1,776	99.3%	745	644	23
2014	44,894	1,430	1,424	99.6%	794	619	104
2015	49,185	1,130	1,125	99.56%	629	232	69
2016	49,368	932	928	99.57%	924	301	42
2017	<del>92,812</del>	817	814	99.63%	1,044	415	33

53,571
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Note: Staff correction with information supplied by Otter Tail Power in reply comments.

### C. Service Extension Request Response Times (7826.1600)

Text of Rule:

*The annual service quality report must include a 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*

PURPOSE OF RULE: As indicated in the Commission’s SONAR, this reporting requirement permits the Commission to monitor service extension request times, one of the service quality standards required by Minn. Stat. §216B.029.

### **Xcel Energy**

As indicated in Attachment H, there were:

- 4,347 service installations requested among commercial and residential customers at locations not previously served in 2017,
- the average in-service date being 2.61 days for residential and 6.6 days for commercial.

Additionally, Xcel stated that 305,792 customers requested service at a location previously served by the Company in 2017. For locations that have been previously served, Xcel is able to “handle these requests on the next business day” as it “generally involves setting a meter and connecting the service.”<sup>8</sup>

The Department acknowledged Xcel’s fulfillment of the requirements of this rule and stated that “response times for residential and commercial customers in 2017 were relatively consistent with data from 2009 - 2016.”<sup>9</sup>

### **Minnesota Power**

In 2017, MP reported there were 779 commercial service extension requests to a location not previously served with a large majority being on schedule and 965 residential requests, also generally on schedule with only a few (16) 10-21 days overdue. Three industrial service requests were also reported and were completed in 10-20 days overdue. Minnesota Power has a grand total of 1,747 new location service requests for the year.

MP explained the three top reasons for delays among customer areas were: dates not updated for project (38% - 205 customers), MP delay due to workload (30% - 161 customers), the customer not read for work to be performed (15% - 84 customers). For more information, please review their pie chart on page 33 of Appendix A of its filing. For service extensions at previously served locations, but not served at the time of the request, MP provided four charts, found on pages 34-37 of Appendix A.

The Department stated that MP had an 18 percent increase since 2015 in requests for service to a location not previously served, while “[n]ew installations are above the average of 1,116

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<sup>8</sup> [Xcel Energy Annual Safety, Reliability and Service Quality Report](#) at 19 (March 30, 2018).

<sup>9</sup> [Department Comments on Xcel Energy](#) at 24 (August 29, 2018).

for the 5-year period between 2012 and 2016.”<sup>10</sup> Nearly 77% were connected by the date requested. For those that were not, the most common reason was “dates not updated for project,” “Minnesota Power delay due to work load,” and “customer not ready.”

**Table 7: New Service Extension Requests: Combined Residential, Commercial, and Industrial**

	Total Number of Installations	Request Date Met	% Request Date Met
2010	712	484	68.0%
2011	603	420	69.7%
2012	653	476	72.9%
2013	794	614	77.3%
2014	857	618	72.1%
2015	1,800	1,070	59.4%
2016	1,476	835	56.6%
2017	1,747	1,338	76.6%

“For locations that previously had service, MP reported a 72 percent increase in the total number of service requests from 2016 to 2017, as well as a 5 percent decline in the percentage of service extensions met by the request date.”<sup>11</sup>

**Table 8: Previously Served Customer Service Extension Requests: Combined Residential, Commercial, and Industrial**

	Total Number of Installations	Request Date Met	% Request Date Met
2010	2,329	2,057	88.3%
2011	2,453	2,198	89.6%
2012	2,526	2,389	94.6%
2013	2,305	2,097	91.0%
2014	2,375	2,216	93.3%
2015	1,671	1,396	83.5%
2016	2,652	2,463	92.9%
2017	4,563	4,032	88.4%

The Department acknowledged Minnesota Power’s fulfillment of the rule.

### **Otter Tail Power Company**

There were 556 customers – divided among residential, small commercial, and large commercial customer classes, but predominately residential and small commercial – requesting service to a location not previously served by Otter Tail and in-date service included in Table 20

<sup>10</sup> [Department Comments on Minnesota Power](#) at 14 (August 1, 2018).

<sup>11</sup> *Id.*

of their filing on pages 39-40. This same table also includes data regarding the number of customers – 1,873 – requesting service to a location previously served by the utility.

The Department acknowledged that Otter Tail Power has fulfilled the requirements of this rule. The Department looked at the data for any significant trends in overall service request response times and determined that “response times for 2017 appear to be relatively consistent with past years.”<sup>12</sup>

#### **D. Call Center Response Times (7826.1700 and 7826.1200)**

Text of the Rule:

##### *Calls to Business Office*

*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.*

##### *Calls Regarding Service Interruptions*

*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.*

#### **Xcel Energy**

Pursuant to the Commission’s November 3, 2004 Order in Docket No. E002/M-04-511, Xcel included credit calls with their call center response times. Xcel also provided a comparison of all service level calls offered to agents, which included all IVR (interactive voice response) handled calls in addition to Residential, Business Solutions Center Calls (BSC), and Personal Account Representatives (PAR).

Xcel noted their centers are staffed 24 hours a day, 7 days a week, with their IVR used in the same manner across this time period, therefore those were their “business hours” and how they reported performance. Xcel highlighted that:

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<sup>12</sup> [Department Comments on Otter Tail Power Company](#) at 21 (June 1, 2018).



- 80.6% of all their outage calls were answered in 20 seconds or less; and
- 90.1% of all calls received were answered in 20 seconds or less.

Pursuant to the Commission's November 2, 2017 Order in Docket No. E002/M-17-553, Xcel provided an update regarding changes to their non-emergency call center hours that became effective January 1, 2018 and are Monday through Friday, 7:00 a.m. to 7:00 p.m. and Saturdays from 9:00 a.m. to 5:00 p.m. The Company reported they have not encountered any issues (technical or other) given this change.

Xcel provided a summary of their call volume on page 20 of their filing:

Overall call volumes remained steady from last year, with a five percent increase in IVR utilization which Xcel attributed to the change in their general business hours. Total Minnesota call volume during the January 1 through March 15, 2018 period was approximately 600,000 and after-hours callers who were presented a recorded message comprise of approximately 335 per weekday and 630 per weekend. Of these callers, 22 percent returned to the main menu; 63 percent hung up; 15 percent completed, and selected to end the call. Of the weekday callers that did not utilize the IVR, approximately 19 percent called the Company back the same business day; 27 percent called back the next business day. Approximately 29 percent of weekend callers called back the next business day. The remaining customers are choosing to self-serve through other channels, including utilization of our IVR system – thus the noted increase.

The Department calculated that in 2017, “an average of 89.38 percent of calls to the Company were answered within 20 seconds” and calls handled by Xcel's Agents had an average of 76.44 percent answered within 20 seconds.”<sup>13</sup>

The Department acknowledged that Xcel fulfilled the requirements of both rules and complied with the ordering paragraph 1 in the Commission's November 2, 2017 Order in Docket No. E002/M-17-553.

### **Minnesota Power**

MP does not have a line dedicated to service interruptions. Instead, all calls, no matter the subject matter, are routed through the Company's Interactive Voice Response (IVR) unit where customers select from a menu of options, one being to speak directly with a call center representative. Calls related to service interruptions are handled immediately through MP's automated trouble-order system while other calls are managed manually by call center representatives. MP uses IVR data to report their service interruption calls, but cannot provide response times on an individual contact type as the IVR is unable to track those. Call center representatives track calls by type of contact. Given this, MP stated that their “response time

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<sup>13</sup> [Department Comments on Xcel Energy](#) at 24 (August 29, 2018).

percentage is shown as an aggregate of all calls received through the IVR and the Call Center, and the calls are not broken out by type of call because Minnesota Power is currently unable to separate response time by contact type.”<sup>14</sup> With 82% of calls being answered within 20 seconds, MP exceeded the established goal as depicted in Figures 15 and 16 on pages 41-42 of Appendix A.

Due to response time performance in 2016, MP carried out several administrative changes to improve response time rates for 2017:

- hired two call center representatives,
- created a new position focusing on quality assurance, created a new program focusing on direct coaching of call center representatives,
- increased staffing levels for the last two hours of the day, and
- “adjusted storm call-out practices so there are more representatives on the phone faster at the onset of outages.”

MP monitored response times throughout the year “to inform staffing and workforce planning decisions.”

MP highlighted that they now have “multiple customer touchpoints” including direct phone calls, their online self-service tool unveiled this year, emails, IVR, etc., so it is important that “we assess the effectiveness of all modes of communication on an ongoing basis as we as the metrics on which we base our decision making.”<sup>15</sup> The Company stated, and staff agrees, that there will be additional and varied ways of interaction and responding to customers, and the same is true for customers to reach out to the utility for complaints or questions. With this Rule targeting call center response metrics being over 15 years old, MP suggests that utilities, stakeholders, and regulators familiarize themselves with industry changes and what customer service targets will be helpful in the future. “As more self-service options become available to customers, the types of calls that the Call Center receives will likely become predominantly more complex and time-consuming that will put pressure on the response time metrics established so long ago.”<sup>16</sup>

In their comments, the Department shared the Company’s response to an email:

The Company stated that it received 145,688 calls during business hours (7:00 am to 5:30 pm) and 14,206 calls after business hours (5:30 pm to 7:00 am) to the Company’s Interactive Voice Response (IVR) unit and, on an annual average, 82.4 percent of all calls received during business hours were answered within 20 seconds and 65.9 percent of calls received after business hours were answered within 20 seconds.

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<sup>14</sup> [Minnesota Power Annual Safety, Reliability and Service Quality Report, Appendix A](#) at 40 (April 2, 2018).

<sup>15</sup> *Id.*

<sup>16</sup> *Id.*

The Department acknowledged Minnesota Power's fulfillment of both rules.

### **Otter Tail Power Company**

Otter Tail Power supplied both a table and graph depicting their call center response times of their nine call centers that fielded nearly 55,000 calls from Minnesota and North and South Dakota.

The utility noted that in the spring of 2017 they went live with a new automated telecommunications system in which customers select the state they are calling from and the service they are calling about. Calls remain answered in the order they are received. The auto attendant will improve accuracy of Otter Tail's call center response time reporting.

With the 96.2% of calls answered within 20 seconds in 2017, the Department concluded that OTP is in compliance with Minnesota Rules, part 7826.1200.

## **E. Emergency Medical Account Status (7826.1800)**

Text of Rule:

*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.*

PURPOSE OF RULE: Minn. Stat. §216B.098 subd. 5 requires a utility to reconnect, or continue service to, a customer's residence where a medical emergency exists or where medical equipment requiring electricity necessary to sustain life is in use. The utility must receive written certification in order for the residential customer to receive this protection. Minn. Rule 7826.1800 requires reporting because, as the Commission's SONAR stated, "it is reasonable to include utilities' implementation of the emergency medical account program as one of the markers of service quality measured annually."

*Initial staff comment:* staff has met with a small number of social service agencies who have indicated they were unaware of this protection. In one conversation, staff for the Department of Human Services stated that they often work with patients with medical issues and could help facilitate getting eligible residents certified for this protection if they understood the protection more.

### **Xcel Energy**

Xcel provided data related to customers seeking medical account status in Attachment G of its filing. Based on the information reported:

- 3,150 customers requested medical account status in 2017;
- 2,388 granted

- 762 denied – denials were based on customer not returning required form or doctor refused to certify as Medical/Life Support.

In compliance with the Commission’s February 9, 2018 Order point 3H in Docket Nos. E002/M-16-281 and E002/M-17-249, Xcel also provided a summary of participants in their Medical Affordability Program, which was approved by the Commission on January 10, 2018 in Docket No. E002/M-17-629. Xcel provided the total enrollment as of March 15th:

- New applications received since program implementation 512
- Minus non-qualifying applications (105)
- Minus incomplete / pending applications (150)
- Total active, newly enrolled participants 257
- Participants transferred from PowerOn 643
- Total Med Affordability participants 900

According to the compliance filing submitted in Docket No. E002/M-10-854 on November 30, 2018, it was reported that participation levels reached 1,472 households by the end of September 2018.<sup>17</sup> Funding levels permitted the Company to not only enroll customers at the 50 percent SMI level, but also 58 customers at the 60 percent SMI level.

The Department calculated that about 75.8 percent of customers were granted medical account status and provided a table summarizing historical data.<sup>18</sup>

**Table 9: Residential Customers Requesting Emergency Medical Account Status**

Year	Requested Medical Acct. Status	Granted Medical Acct. Status	Percent Granted
2008	1,847	1,460	79.0%
2009	1,783	1,292	72.5%
2010	1,762	1,162	65.9%
2011	1,572	716	45.5%
2012	1,508	679	45.0%
2013	1,562	832	53.3%
2014	1,780	1,012	56.9%
2015	3,333	2,557	76.7%
2016	3,427	2,713	79.2%
2017	3,150	2,388	75.8%

In observing the increase of medical account applicants since 2015, the Department referenced Reply Comments in Xcel’s last service quality report filed on September 9, 2017 in Docket No.

<sup>17</sup> *In the Matter of 2018 ANNUAL REPORT ELECTRIC LOW INCOME ENERGY DISCOUNT PROGRAM*, Docket No. E002/M-10-854, [Compliance Filing](#) at 8-9 and Attachment C at 22.

<sup>18</sup> [Department Comments on Xcel Energy](#) at 24 (August 29, 2018).

E002/M-17-249 where “the Company stated that it expects the higher numbers to be the new normal as the customer base continues to age.”<sup>19</sup>

Finally, the Department acknowledged Xcel’s fulfillment of this rule.

### **Minnesota Power**

MP reported that 146 customers applied for emergency medical account status with 142 being granted after customers provided the required signed physician documentation.

MP supplied the reasons for the denial of the four applications:

1. November 9, 2017: Minnesota Power received incomplete sleep study results originating from 2016. Customer representatives attempted to contact the customer to discuss the need to obtain complete documentation.
2. After many attempts to call the customer, representatives left a voicemail and noted interactions in the customer’s account. The customer did not response to the communications.
3. October 17, 2017: Minnesota Power received a Minnesota Energy Resources form from a customer indicating critical gas equipment. Customer representatives called and spoke to the customer and advised our standard to add the Emergency Medical Status flag. After further communication, the customer did not send the appropriate documentation.
4. October 9, 2017: Minnesota Power received a letter indicating that the customer was suffering from acute bronchitis temporarily and was on an oral antibiotic. Per Company policy, this was not deemed a medical emergency.
5. August 7, 2017: Minnesota Power received incomplete sleep study results originating from 2015. Representatives attempted to contact the customer to discuss the situation and received no answer. The interactions were noted on the customer account. The customer did not responded to the communications.
6. Following a brief summary of the medical account status reported by MP, the Department acknowledged MP’s fulfillment of the requirements of the rule.

### **Otter Tail Power Company**

The utility reported 24 customers requesting relief with the emergency medical status and all were granted. The Department acknowledged OTP’s fulfillment of the requirements of Minnesota Rules, part 7826.1800.

## **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.

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<sup>19</sup> [Department Comments on Xcel Energy](#) at 25 (August 29, 2018).

### Xcel Energy

Xcel requested a total of 314 deposits as a condition of service for their residential customers that had filed for bankruptcy; the utility requests these deposits upon notification from the bankruptcy court and/or the customer of their bankruptcy petition.

The Department provided historical data in Table 10 of their comments before acknowledging Xcel's fulfillment of this rule.<sup>20</sup>

**Table 10: Customer Deposits Required**

Year	Number of Deposits
2003	884
2004	704
2005	1,181
2006	587
2007	821
2008	805
2009	798
2010	657
2011	655
2012	622
2013	652
2014	606
2015	561
2016	362
2017	314

### Minnesota Power

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

The Department acknowledged that, although MP did not collect deposits in 2017, they had fulfilled the rule and provided a table of historical data.

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<sup>20</sup> [Department Comments on Xcel Energy](#) at 26 (August 29, 2018).

**Table 9: MP's Required Deposits**

Year	Residential	Commercial	Total
2006	153	1	154
2007	5	0	5
2008	74	1	75
2009	161	21	182
2010	190	24	214
2011	222	10	232
2012	315	1	316
2013	326	11	337
2014	-	-	-
2015	0	0	0
2016	0	0	0
2017	0	0	0

**Otter Tail Power Company**

Otter Tail reported that 698 customers were required to make a deposit as a condition of receiving service during 2017, which is 17 fewer customer accounts when compared to 2016 numbers.

The Department acknowledged OTP's fulfillment of the rule and provided a table looking back at the previous nine years and noted the upward trend of customers served appears to be stabilizing.

	Number of Deposits Required	Total Customers Served
2004	315	57,585
2005	417	58,516
2006	395	58,841
2007	509	59,171
2008	700	59,364
2009	869	59,421
2010	635	59,425
2011	807	59,486
2012	847	59,615
2013	895	59,849
2014	783	61,169
2015	597	60,232
2016	715	61,226
2017	698	61,568 <sup>12</sup>

## G. Customer Complaints (7826.2000)

Text of Rule:

*The annual service quality report must include a detailed report on complaints by customer class and calendar month, including at least 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.*
  - (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.*

PURPOSE OF RULE: The rule requiring the reporting of customer complaints is obvious: to track whether there could be a pattern or practice at a particular utility that needs to be monitored. In the Commission's SONAR, the Commission noted that arriving at a definition of "customer complaint" was "one of the most difficult issues in this rulemaking, because all available options seemed to be either over-inclusive or under-inclusive." The Commission ultimately chose a more expansive definition but limited complaints to communications with a utility's call center. Informally, at recent planning meetings summarizing DG calls to the Commission, Commissioners have offered feedback which may help utilities and stakeholders think about further refinements to reporting customer complaints. Staff will further describe these options in staff analysis.

### **Xcel Energy**

The sixteen-page Attachment J in Xcel's Annual Report included complaints handled by either the utility's three call center(s) or the Company's Customer Advocate Group.

A total of 572 complaints were recorded by Customer Advocates with 21 commercial and 550 residential; 114 of them were categorized as "not under utility action."

This year, Xcel included an additional complaint type noted by the column titled "High Bill", which includes complaint calls related to decoupling issues. The main sources of complaints



were Internal, Commission, and the Office of Attorney General (OAG) and chief complaint types were Inadequate Service (residential and commercial) and Wrongful Disconnection (residential), followed by Billing Error (residential and commercial).

Xcel reported the percentage of complaints that were resolved within the timelines expressed in the rule – initial, within ten days, and more than ten days. The majority of complaints across all customer classes were resolved within ten days or less. The utility had 113 complaints forwarded to them from the Commission’s Consumer Affairs Office, where all but five were residential.

Lastly, Xcel included monthly reports in Attachment J that summarizes the calls received through the Company’s call centers, how calls were handled, the type of concern that was shared, and from which customer base (commercial, residential, industrial). Not all are included in these papers, but January’s ‘Customer Complaint Report’ is the last item as an example. Please see pages 5 to 16 of Attachment J (PDF pages 79-90) for the remaining months.

The Department calculated “that 18 percent of complaints in 2017 handled by Xcel’s Customer Advocate Group were resolved upon inquiry” and “27.10 percent of these complaints were resolved by taking the action the customer requested.”<sup>21</sup> The most frequent complaint category that Advocates fielded was “inadequate service.”

It was noted by the Department that Xcel also received 665,739 complaints in its Call Centers throughout 2017 with approximately 96 percent being resolved by taking the action the customer requested. In 2017, the highest complaint category for all customers that the Call Centers experienced was “billing errors.” Table 11 below contains a limited summary of Xcel’s customer complaint history provided in the Department’s comments.

**Table 11: Selected Summary of Customer Complaints<sup>32</sup>**

Year	Number of Complaints	Inadequate Service	Wrongful Disconnect	Billing Error	Resolved Upon Initial Inquiry	Took Action Customer Requested
2010	693	44.90%	21.90%	18.20%	17.00%	29.10%
2011	627	49.10%	17.20%	16.70%	13.20%	28.20%
2012	613	53.50%	19.70%	17.30%	18.60%	27.41%
2013	745	55.80%	15.60%	13.80%	18.90%	38.26%
2014	770	53.20%	19.70%	14.80%	16.80%	51.30%
2015	789	52.50%	23.40%	13.30%	14.30%	29.50%
2016	547	52.10%	19.00%	14.60%	16.30%	32.70%
2017	572	53.50%	24.50%	10.50%	18.00%	27.10%

<sup>21</sup> [Department Comments on Xcel Energy](#) at 24 (August 29, 2018).

The Department acknowledged Xcel's fulfillment of the requirements of the rule.

Finally, the Department recommended that the Commission require Xcel to provide refreshed information responsive to the Commission's February 9, 2018 Order in Docket Nos. E002/M-16-281 and E002/M-17-249 regarding data on the number of applicants and participants in the Company's Medical Affordability Program. Xcel agreed with the Department's recommendation to include this in future annual reports.

### **Minnesota Power**

MP reported the number of complaints received and noted that any customer classes other than residential or commercial are handled individually and not recorded in their Customer Information System. A total of 697 complaints were received in 2017, with 56 commercial and 641 residential.

At 59%, high billing was the leading commercial customer complaint, followed by incorrect metering at 29%. Likewise, the largest residential complaint was also high billing comprising of 79% of complaints, also followed by incorrect metering at 11%.

Complaints were managed as reported in their bar graph on page 49. A large majority of residential (69%) and commercial (57%) complaints were resolved in the same day.

MP provided context on which actions provided solutions to customer complaints and summarized them in pie graphs on pages 50-51. For residential complaints, a majority (53%) were in the category of 'No Control' where the utility has no control over the issue. For commercial complaints, 62% were resolved through compromise.

Finally, MP reported that 14 complaints from the Commission's Consumer Affairs Office (CAO) were forward to them for further investigation and action in 2017.

Table 10 in the Department's comments shows the historical number of complaints received by the Company over the last ten years.

**Table 10: Summary Complaint Totals**

Year	Commercial	Residential	Industrial	Total
2008	96	1,582	0	1,678
2009	137	1,534	0	1,671
2010	141	1,585	0	1,726
2011	76	1,178	0	1,254
2012	81	780	0	861
2013	63	663	0	726
2014	64	1,045	0	1,109
2015	27	540	0	567
2016	46	388	0	434
2017	56	641	0	697

The number of complaints forwarded to the Company by the Commission’s Consumer Affairs Office in 2017 was slightly higher than the previous years’ average of 11.9. The Department’s Table 11 shows the number of complaints forwarded to the Company by the Commission’s Consumer Affairs Office (CAO) over the past ten years.

**Table 11: Complaints Forwarded by the CAO**

Year	# of Complaints
2008	10
2009	4
2010	15
2011	10
2012	9
2013	11
2014	13
2015	13
2016	22
2017	14

Finally, the Department acknowledged MP’s fulfillment of the rule.

### **Otter Tail Power Company**

In 2017, the utility received 33 complaints spanning across seven complaint types, which were summarized in Table 22 on page 43 of their filing. 36 percent of those complaints were considered out of OTP’s control. Otter Tail received two customer complaints that were forwarded from the Commission’s Consumer Affairs Office, both of which were resolved. The “other” type in the table below were complaints that included such as things as rebate timing, planned outages, and third party meter readers – topics that may not fit within the complaint sections of their new Customer Information System.

Although their table from page 43 indicates differently, Otter Tail reported that nearly all (30) of the complaints were resolved on initial inquiry, with 3 needing more than ten days.

Other than noting that 20 of the 33 complaints from 2017 were listed in the “other” category - approximately 59% of the total number of complaints – the Department acknowledged OTP’s fulfillment of the rule requirements and provided a table with complaint data from the previous 12 years.

	Number of Complaints	High Bills	Billing Error	Service Restoration	Resolved Upon Initial Inquiry	Took Action Customer Requested
2005	286	49%	7%	2%	41%	66%
2006	175	39%	7%	2%	54%	49%
2007	220	27%	29%	5%	66%	46%
2008	325	52%	18%	2%	60%	34%
2009	185	29%	14%	5%	78%	36%
2010	91	26%	11%	11%	78%	25%
2011	110	19%	9%	10%	73%	30%
2012	61	7%	11%	7%	72%	32%
2013	133	9%	17%	5%	92%	21%
2014	98	12%	11%	4%	83%	31%
2015	86	22%	22%	0%	77%	23%
2016	28	0%	14%	0%	93%	54%
2017	33	6%	16%	0%	91%	24%

#### IV. Other Party Comments

##### Minnesota Power Process and Policies

The Citizens Utility Board of Minnesota (CUB) and the Minnesota Citizens Federation Northeast, Energy CENTS Coalition, Legal Services Advocacy Project, and the Office of Attorney General – Residential Utilities and Antitrust Division provided comments in Minnesota Power’s 2018 annual report docket. The groups had concerns specific to MP’s policies on disconnection, reconnection, payments, as well as Cold Weather Rule implementation. Please see the parties’ comments for more details on their concerns.

On January 14, 2019, MP filed a finalized “scope of work for a compliance review and assessment of MP’s payment agreements, disconnection, reconnection, and Cold Weather Rule and related service practices for residential customers.”<sup>22</sup> An independent third party will gather and assess information and data for years 2015 through 2018 focusing on MP’s treatment of past due customers, service disconnections and reconnections, and reporting requirements. A report will be furnished describing the work that was undertaken, information obtained, and analysis, findings and discussion and will be e-filed in the docket. The following concentration areas were determined by the parties:

<sup>22</sup> [Minnesota Power Letter – Scope of Work](#) at 14 (January 1, 2019).

- The accuracy of MP's data and its publicly filed reports, where required, regarding disconnections, reconnections, payment agreements numbers, and both CWR and non-CWR data for residential customers;
- MP's policies and procedures in CWR and non-CWR months with respect to payment agreements, service disconnection, reconnections, and whether those policies and procedures comport with the relevant statutory and rule requirements;
- MP's performance with respect to payment agreements, disconnection, and reconnection in CWR and non-CWR months and, to the extent possible, whether MP's policies, practices and procedures are otherwise reasonable and effective in reducing disconnections and encouraging reconnections; and
- Potential policy, process or reporting improvements identified during the course of the review and assessment.

## V. Minnesota Power's Reconnect Pilot

As MP summarized, the Reconnect Pilot utilizes advanced metering infrastructure (AMI) with remote technology that makes it possible to reconnect customers in a timelier manner.<sup>23</sup> Under this pilot, residential customers with a smart meter that is also equipped with remote technology will be given the option to be reconnected remotely while a customer service representative initiates a reconnection and stays on the line with the customer to walk them through the process and affirm the reconnection.<sup>24</sup> This process will save both personnel and truck equipment from being sent to the location for reconnection, delivering a monetary savings and, potentially, boosting the safety of MP's staff in addition to leveraging new technology.<sup>25</sup> This Reconnect Pilot could mean an improvement and difference between reconnection in minutes versus days in some instances.

Currently, MP's standard reconnection fee is \$20 during normal business hours, but customers who need reconnection outside of normal business hours after 4:30 PM, before 8:00 AM and on Saturdays, Sundays, and legal holidays<sup>26</sup> would have a fee of \$100. This pilot provides a discounted reconnection fee of \$20 any day or time for customers who have a smart meter as noted in MP's table.<sup>27</sup>

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<sup>23</sup> [Minnesota Power 2017 Annual Safety, Reliability and Service Quality Report](#) at 34 (April 2, 2018).

<sup>24</sup> *Id.*

<sup>25</sup> *Id.* at 34-36.

<sup>26</sup> MP mentioned the legal holidays it observes as: New Year's Day, Independence Day, Memorial Day, Labor Day, Thanksgiving Day, and Christmas Day.

<sup>27</sup> [Minnesota Power 2017 Annual Safety, Reliability and Service Quality Report](#) at 34 (April 2, 2018).

Time	Reconnection Fee
8:00 am – 4:30 pm M-F	\$20
After 4:30 pm, before 8:00 am, Saturdays, Sundays, and legal holidays <sup>13</sup>	\$100
Any time (Reconnect Pilot proposal) <sup>14</sup>	\$20

*3: Reconnection Fee Timeframes*

While Commission approval is not needed for the use of AMI in the field as long as Minnesota Power complies with disconnection rules and statutes, Commission approval is needed to offer the proposed reduced reconnection fee as “it entails a change to the electric service regulations of Minnesota Power and represents a cost difference that would only be available on a limited basis to a subset of customers with this meter capability.”<sup>28</sup>

The prioritized group for this pilot would be customers with frequent disconnections (four or more over a five year period), those with difficult access, a hazardous location, and/or threats to utility personnel such as a dog or other unsafe conditions.<sup>29</sup> Customers will have the option to follow standard processes in lieu of the discounted reconnection fee if they wish.<sup>30</sup>

Finally, please look to [Attachment F](#) of MP’s reply comments for the tariff sheet, which outlines the reconnection costs, eligibility and selection criteria, opt-out provisions, and disconnection and reconnection procedures.

#### **Department of Commerce comments on Reconnect Pilot**

The Department recommended rejecting the pilot program as not enough cost data was provided to assess the program.

The Department noted that the proposal was brought forward by MP in their last rate case (Docket No. E015/GR-16-664) where the Commission took no action. “In its initial proposal, Minnesota Power stated that approximately 200 residential customers with advanced metering infrastructure who have been disconnected for nonpayment in the past could be identified and given metering configuration that would enable remote reconnections, which could occur after normal business hours or on weekends or holidays, for \$20.00 per reconnection.”<sup>31</sup>

<sup>28</sup> [Minnesota Power 2017 Annual Safety, Reliability and Service Quality Report](#) at 37 (April 2, 2018).

<sup>29</sup> *Id.* at 36 (April 2, 2018).

<sup>30</sup> [Reply Comments by Minnesota Power](#) at 15 (August 20, 2018).

<sup>31</sup> [Department Comments on Minnesota Power](#) at 18 (August 1, 2018).

It was recommended by the Department that the Company “provide compliance filings detailing the amount of money saved from this program” and MP was agreeable, suggesting that this information could be included in the annual service quality reports.<sup>32</sup>

At that juncture, the Department was not opposed to the proposal. The Administrative Law Judge found the proposal to be “just and reasonable” and recommended implementation.<sup>33</sup> While acknowledging and attempting to address concerns brought forward by Energy CENTS, the Department continued to support the Company’s proposed Reconnect Pilot and “agrees that the lowered cost to both customers and the Company, the increase in safety and reduced wear and tear of equipment, and the prospect of timelier reconnections are important benefits that could eventually be expanded to more customers.”<sup>34</sup>

The Department inquired about the costs associated with reconnection and asked MP to submit a cost study detailing the costs of the four available reconnections: remote during business hours, remote during non-business hours, in-person during business hours, and in person during non-business hours. The Company responded with the following figures:

Regular Business Hours: \$40-\$55/hour of Labor and Vehicle Costs

After-Business Hours: \$109-\$154/2 hours of Labor and Vehicle Costs

**Table 1. MP’s Estimated 2014 Labor and Vehicle Costs to Reconnect Customers In-Person, Business Hours, Non-Business Hours, and Total**

Labor and Vehicle Cost to Reconnect Customers in Person During Business Hours (2014)	Labor and Vehicle Cost to Reconnect Customers in Person During After-Business Hours (2014)	Total Labor and Vehicle Cost to Reconnect Customers (2014)
\$9,000-\$12,375	\$1,308-\$1,848	\$10,308-\$14,223

**Table 2. MP’s Estimated 2014 Fees Charged to Customers for In-Person Reconnections, Business Hours, Non-Business Hours, and Total**

Fees Charged to Customers Reconnected In-Person During Business Hours	Fees Charged to Customers Reconnected In-Person During Non-Business Hours	Total Fees Charged to Customers
\$4,500	\$1,200	\$5,700

<sup>32</sup> *Id.*

<sup>33</sup> *Id.* at 19.

<sup>34</sup> [Department Comments on Minnesota Power](#) at 19 (August 1, 2018).

The Company used 2014 data to compute the labor and vehicle costs according to the 237 reconnections that occurred that year (225 regular business hours and 12 after business hours) and compared those to the fees collected, which is \$20 for in-person during business hours and \$100 for in-person after business hours. The Department summarized this data in their reply comments on page 5:

MP noted that these figures did not include overhead or lost productivity or inefficiencies due to the interruption.<sup>35</sup> The Department again requested details pertaining to the costs of connecting remotely both during and after business hours “to assess whether the proposed fees of the Reconnect Pilot would be reasonable. Without this information, it is unclear whether the Reconnect Pilot actually produces cost savings.”<sup>36</sup>

It was calculated by the Department that “both business-hour and non-business hour costs would be reduced if remote meters are installed; yet the Company has yet to demonstrate the cost savings.”<sup>37</sup> Therefore, the Department was not able to verify that the reconnection cost savings associated with the proposed pilot are properly reflected in the pilot’s reconnect fee.<sup>38</sup>

The Department concluded that “while the Reconnect Program logically sounds more cost effective than the current reconnection practices, the Company has not adequately demonstrated it to be so.”<sup>39</sup> Therefore, the Department recommended “that the Commission deny the Company’s proposed Reconnect Program, unless the Company submits an adequate cost study detailing the marginal cost of serving each type of customer circumstance and demonstrates how this program would result in a reduction of net reconnection costs captured in the Company’s next rate case.”<sup>40</sup>

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<sup>35</sup> [Reply Comments by Minnesota Power](#) at 16 (August 20, 2018).

<sup>36</sup> [Department Response to Reply Comments on Minnesota Power](#) at 6 (September 10, 2018).

<sup>37</sup> *Id.*

<sup>38</sup> The Department agreed with MP’s statement that not all costs affiliated with reconnections are actually recovered from the customers who cause such costs. ... “the remaining unrecovered costs are embedded in base rates that are charged to all customers. In theory, the Department stated, the Company should report net reconnection costs (reconnection costs less reconnection fee revenue) as costs eligible for recovery through base rates; this approach ensures that no double recovery takes place. . If the Reconnect Pilot does in fact produce cost savings, then a greater percentage of reconnection costs will be recovered by the cost causers via reconnection fees.”

<sup>39</sup> [Department Response to Reply Comments on Minnesota Power](#) at 7 (September 10, 2018).

<sup>40</sup> *Id.*



**Table 4. 2014 Percentage of In-Person Reconnection Costs Recovered by Company Reconnection Fees, Business Hours, Non-Business Hours, Total**

Percentage of Business Hour Costs Recovered	Percentage of Non-Business Hour Costs Recovered	Percentage of Total Costs Recovered
36%-50%	65%-92%	40-55%

However, should the Commission wish to approve the Reconnect Pilot, the Department initially made the recommendation that MP should submit “annual compliance filings detailing the costs, and cost savings realized from the Pilot, both from the Company’s and the customers’ perspectives ... reports may include figures such as how many customers were chosen for the pilot, whether anyone asked to stop participating, and the number and nature of any complaints. The Department does not object to MP submitting these compliance filings in the annual service quality reports.”<sup>41</sup>

### Energy CENTS Coalition

Energy CENTS Coalition (ECC) recommends rejecting the pilot.

While MP stated that the pilot was filed at the request of the Commission in its last rate case (Docket No. E-015/GR-16-664), Energy CENTS disagreed and stated “the ‘guidance’ the Commission provided in the rate case was to reject the Administrative Law Judge’s finding that the Reconnect Pilot was just and reasonable.”<sup>42</sup> The language from the [March 12, 2018 Order](#) was provided (found on page 81):

The Administrative Law Judge concluded that the Company’s proposal is just and reasonable, dismissing the concerns of Energy CENTS. He reasoned that *remote disconnection of service is not an issue raised by the Company as part of its pilot* and is therefore not under consideration. He also reasoned that because reconnection is initiated via a phone call by the customer to the Company, there is no safety issue. He further reasoned that once customers who are disconnected “get their finances in order sufficient to resume electric service, the pilot benefits them directly by ensuring” reconnection at the same low price that applies during regular business hours.

The Commission is not persuaded by the Administrative Law Judge’s reasoning and will not adopt his recommendation. He insufficiently addressed the concerns of Energy CENTS, and as a result, his reasoning is not persuasive (emphasis added).

<sup>41</sup> [Department Comments on Minnesota Power](#) at 23 (August 1, 2018).

<sup>42</sup> [Comments by Energy CENTS Coalition](#) at 14 (July 30, 2018).

Energy CENTS' is concerned regarding disconnection practices as in order for the program to be effective (remote reconnection), a remote disconnection signal must be made in some instances and it is unclear how such signal conforms with the disconnection requirements and payment procedures found in Minnesota rules and statutes.<sup>43</sup>

Additionally, it "does nothing to address the more fundamental problems of the number and duration of service disconnections."<sup>44</sup> During the rate case, MP stated that "[i]t is difficult to say whether the Reconnect Pilot will increase the number of customers restored to service within 24 hours because ... it is still the customer's responsibility to make the appropriate payments to timely restore service."<sup>45</sup>

ECC also felt there is potential for discriminatory treatment as the targeted populations for the program are low income, urban customers. Shared by ECC but identified by MP in their 2016 rate case:

216 customers that have "frequent disconnections," roughly 150 of which are included in the proposed pilot. For the purposes of this pilot, frequent disconnection refers to a customer that has four or more total disconnections. Of the 216 customers that meet the "frequent disconnections" criteria, 39 have been on the CARE rate and 138 are renters.<sup>46</sup>

No cost estimates or cost-benefit analysis were provided for parties to review. ECC highlighted that there is a 28% cost increase to add the remote technology on an AMI meter required for the pilot.<sup>47</sup>

Energy CENTS emphasized the contradictory justification provided for the pilot. During the rate case, MP said their inability to restore more customers within 24 hours of disconnection is due to safety concerns. Under current practices, the company must confirm a customer is at the premises before reconnecting, which requires the customer to be in contact with the utility.<sup>48</sup> Compared to what was described in the pilot, MP stated that remote reconnection is a safer way to reconnect and a customer service representative would be on the phone and walk them through the reconnection.<sup>49</sup>

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<sup>43</sup> [Comments by Energy CENTS Coalition](#) at 15 (July 30, 2018).

<sup>44</sup> [Comments by Energy CENTS Coalition](#) at 16 (July 30, 2018).

<sup>45</sup> [Comments by Energy CENTS Coalition](#) at 16 (July 30, 2018).

<sup>46</sup> [Comments by Energy CENTS Coalition](#) at 16 (July 30, 2018).

<sup>47</sup> [Comments by Energy CENTS Coalition](#) at 16 (July 30, 2018).

<sup>48</sup> [Comments by Energy CENTS Coalition](#) at 16-17 (July 30, 2018).

<sup>49</sup> [Comments by Energy CENTS Coalition](#) at 17 (July 30, 2018).

Finally, it is believed by ECC that MP is using low-income customers to experiment new technology and save customer service-related costs.<sup>50</sup>

### **Legal Services Advocacy Project (LSAP)**

The Legal Services Advocacy Project (LSAP) recommended the Commission reject the pilot program.

Foremost among LSAP's concerns is that the pilot is incompatible with Minn. R. 7820.250 as there is a requirement that utility personnel make a personal visit to the address where the service is rendered and have personal contact with the customer at the address.<sup>51</sup>

Further, LSAP stated the “[i]t is impossible for a disconnection accomplished remotely can comport with these requirements” as “the utility representative [who makes the personal visit] shall at all times be capable of receiving payment, if nonpayment is the cause of the disconnection of service, or the representative shall be able to certify that the cause of disconnection has been remedied by the customer.”<sup>52</sup>

### **Citizens Utility Board of Minnesota (CUB) and the Minnesota Citizens Federation Northeast (the Citizens Federation)** <sup>53</sup>

CUB and the Citizens Federation recommend that MP's proposed Reconnect Pilot be denied. The groups “support MP's exploration of cost-saving opportunities through new technologies,” but “the concerns raised by ECC should be addressed before approving any measures that could affect customer disconnections and “no pilot program should be approved without an estimation of its net costs.”

## **VI. Staff Analysis**

Apart from MP's third party review discussed above, there were few issues found in the service quality reports for 2018. Staff raises a few issues below for the Commission's consideration.

### **A Changing Environment and Consumer Preferences**

Recent technology has changed and improved customer interaction through the use of automated call processing systems and more modern customer interaction tools, such as communication through social media, mobile apps, emails, text/SMS, customer dashboards/portals, and online chat support, among others. As the communication environment has changed, so too has customer preferences and expectations. Many utilities are meeting consumer demand through the above-mentioned technology-enabled self-services

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<sup>50</sup> [Comments by Energy CENTS Coalition](#) at 18 (July 30, 2018).

<sup>51</sup> [Comments by Legal Services Advocacy Project](#) at 6 (August 16, 2018).

<sup>52</sup> [Comments by Legal Services Advocacy Project](#) at 6 (August 16, 2018).

<sup>53</sup> [Comments by Citizens Utility Board of Minnesota \(CUB\) and the Minnesota Citizens Federation Northeast \(the Citizens Federation\)](#) at 2 (August 20, 2018).

that are often available 24/7. These modern tools are not currently reported to or reviewed by the Commission as the reporting rules predate these innovations.

Electric utilities are providing more customer support than what is captured in the standards found in Minn Rules 7826 and given the Commission's goal to ensure safe and reliable electric service, it would make sense that the Commission would be aware of these activities, perhaps at a broad level. An instance that demonstrates utilities providing real-time support to their customers is the use of text messaging for incident management, dispatching field personnel to their home, or severe weather alerts. Staff is not suggesting these be reported, but only highlighting the great change in communication and utility to customer interaction with this *one* tool.

To consider what information the Commission does receive, the Commission will have a student intern in the summer of 2019 to review information that is gathered through these annual reports. The intern will be looking at customer service and disconnection data filed in the electric service quality reports and considering ways the data could be more useful and its relevancy in today's environment of online communication (i.e. email, text, chat/messaging, etc.). An instance where this data could provide value is with energy assistance providers, who may not be aware of the data and could find it useful in targeting their resources to certain areas or use it as a way to measure their programmatic impact.

If utilities have suggestions on the intern project, staff is open to hearing them.

### **New Resource: Summary Reports**

These annual reports hold a wealth of information that many customers, stakeholders, and organizations would appreciate access to; however, the current reporting format, while publicly accessible, is not for the general public. To illustrate:

- Xcel's electric service quality report (with attachments) is 856 pages;
- MP's electric service quality report is 173 pages;
- OTP's electric service quality report is 61 pages.

A member of the public, city council person or other elected official asking on behalf of a constituent, or social service agency would have trouble finding some basic data in these reports. The length of these reports is not the utility's fault; they are simply reporting the volume and level of detail that regulatory agencies require them to.

Staff suggests that utilities consider the creation of a one to three page summary of their service quality and customer service metrics in a digestible format for the public. This resource has the opportunity to provide good company imaging while it bridges gaps that quickly educate and connect consumers with their utility and, at the same time, provide a public benchmark. It can be a resource that many organizations use and share, including our Consumers Affairs Office. Staff notes that the Commission recently initiated this same project for the gas service quality reports at its February 28, 2019 meeting.

Additionally, consumer and stakeholder access to this information outside of the annual reports is of interest to the Commission. Staff also wishes to begin the discussion on future opportunities where utilities could provide their metrics to their customer base and interested stakeholders. For example, in some states, utilities are required to post their annual data on their webpage with access from the main page.<sup>54</sup>

If the Commission agrees, staff suggests that the Commission request utilities to file these one to three page public summaries with their service quality filings after the content and format has been determined either through a Commission-led process or through utility proposals. This concept is listed as **decision option 3. D.**

### **Tracking and Reporting of Customer Complaints**

While staff is not suggesting a rulemaking, it may be advisable to have a dialogue about the reporting of customer complaints and the definition of a customer complaint. As listed previously, at planning meetings when Commissioners have asked for summaries of DG calls, they have specifically asked to separate out complaints from inquiries, and have generally taken the approach that a “complaint” is only related to a customer call where a problem is identified *and within the utility’s power to solve*. In the 15+ years since the Commission adopted these rules, a number of third parties (efficiency providers, solar installers, and other vendors) have entered the electricity space and may play a part in an issue that results in a customer call to their electric utility. Each utility provided statistics on the percentage of complaints that were received but not within the utilities’ control. Staff suggests utilities examine this issue and report back in a short narrative format in their April 1, 2020 filings. This is listed as **decision option 3. E.**

It may also be useful for utilities to have a dialogue about the portion of the Commission’s customer complaint rule that limits the definition of “complaint” to communications with a utility’s call center. Utilities may receive communications by e-mail, by contact forms on their website, or other electronic communications that are intended to be complaints. Staff suggests utilities examine this issue and report back in a short narrative format in their April 1, 2020 filings. This is listed as **decision option 3. F.**

### **Medical Emergency Account Status**

Minn. Stat. §216B.098 subd. 5 requires a utility to provide continued service (or reconnected service) to a customer’s residence where there is a medical emergency or where medical equipment requiring electricity necessary to sustain life is in use. Under the Commission’s

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<sup>54</sup> For example, Hawaiian Electric Companies (HECO) has their SQSR data available within their ‘Key Performance Metrics’ and ‘Service Reliability’ and ‘Customer Service’. The utility also provides historical data. Please visit here: <https://www.hawaiianelectric.com/about-us/key-performance-metrics/service-reliability> and <https://www.hawaiianelectric.com/about-us/key-performance-metrics/customer-service>.

service quality rules, utilities are required to report data in their service quality reports on this protection.

Staff agrees with the Department that utilities complied with Minn. Rule 7826.1800 in reporting this data. However, it may be useful to examine whether eligible Minnesotans are aware of this protection in the first place. As referenced previously, staff has heard from social service personnel that they are not aware of this protection despite working with populations that have medical equipment in their homes necessary to sustain life. Additionally, staff and others are aware of Minnesota's unprecedented aging demographic, which, with an older population, could increase the need for such medical protections. As reported by the Minnesota State Demographer Center, "Right now, Minnesota is on the cusp of an era in which its older adult population (ages 65+) will surge to a figure that is several orders of magnitude larger than what our state experienced just half a century ago."<sup>55</sup> Staff suggests that this may be a project for the Commission's intern this summer or could be part of a dialogue with utilities and staff on the best way to perform outreach on this important consumer protection. Staff has not included a specific reporting requirement since a report on the outcome of the dialogue could potentially be issued by the Commission's intern, by staff, or by the utilities. This is listed as **decision option 5**.

#### **Future Staff Reviews of Service Quality Reports**

As listed in the beginning of these briefing papers, staff is taking a renewed look at these rules and the data provided in these service quality reports given the age of the Commission's rules and the changes in the electric industry. Staff anticipates continuing to review and raise observations about the rules and resulting reports. Staff's general approach behind reviewing these reports will be:

- Is the data reported in these reports still relevant?
- Is there data in these reports that would be more relevant or useful if reported in a different way? Is there data in these reports that should be discontinued?
- Are there other stakeholders that would find this data useful?
- Are there ways to have utilities report data more consistently?
- Is the data in these reports comparable among utilities?

#### **MP Reconnect Pilot**

Several concerns were brought forward by the parties and addressed by MP:

- Concerns regarding the use of remote disconnection in relation to the pilot program. Parties seemed to have confusion over the process and MP stated that no matter which technology is used to disconnect service, MP will follow the requirements of the disconnection rules.

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<sup>55</sup> Minnesota State Demographer Center, Demographic Considerations for Long-Range & Strategic Planning: [https://mn.gov/admin/assets/demographic-considerations-planning-for-mn-leaders-msdc-march2016\\_tcm36-219453.pdf](https://mn.gov/admin/assets/demographic-considerations-planning-for-mn-leaders-msdc-march2016_tcm36-219453.pdf) and Minnesota's Aging Statistics found at: <https://mn.gov/admin/demography/data-by-topic/aging/>.

This includes a physical visit by utility personnel and all the notices and activities required up to that juncture including assistance with payment plans to avoid disconnection.<sup>56</sup>

- In targeting low-income program participants, MP stated that no discriminatory efforts were made and the utility used objective criteria without details related to income data or LIHEAP status. For more information on the selection process, please see page 15 of MP's reply comments.
- MP underscored that this offering is completely optional and customers will have the option to follow the standard processes in lieu of the discounted remote reconnection if they so wish.

Staff is supportive of the concept of the pilot – saving consumers money and time, especially those with frequent disconnections, while streamlining the reconnection process. However, as highlighted by the Department, the Company did not provide cost savings data. Staff suggests MP could in a compliance filing provide the specific cost savings data (the cost of remote connection) and work with the Department until they are in agreement.

[DECISION OPTIONS ON NEXT PAGE]

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<sup>56</sup> [Reply Comments by Minnesota Power](#) at 14 (August 20, 2018).

## VII. Decision Options

1. Accept the 2018 Service Quality Reports from Minnesota Power, Otter Tail Power, and/or Xcel Energy. (*Department, Minnesota Power, Otter Tail Power, Xcel*)
  - a. Review the forthcoming report for Minnesota Power's disconnection and CWR data and take action, if any is needed, at that time.
2. Reject the 2018 Service Quality Reports from Minnesota Power, Otter Tail Power, and/or Xcel Energy.
  - a. Review the forthcoming report for Minnesota Power's disconnection and CWR data and take action, if any is needed, at that time.
3. Future Reporting
  - a. Request Xcel to provide refreshed information responsive to the Commission's February 9, 2018 Order in Docket Nos. E002/M-16-281 and E002/M-17-249 in future annual service quality reports. (*Department, Xcel*)
  - b. Request Minnesota Power to file a final report or documentation from its work with the Commission's Consumer Affairs Office in identifying and addressing challenges within the CARE (Customer Affordability for Residential Electricity) program in future annual service quality reports. (*Department*)
  - c. Require MP to file the percentage of remote-capable customers who receive LIHEAP in future annual service quality reports. (*Department*)
  - d. Direct utilities to consult with staff to draft a brief page summary of their annual service quality and reliability metrics that is digestible and usable for general audiences. (*Staff*)
  - e. Direct utilities to further break down the percentage of complaints that were received but not within the utilities' control (i.e. those related to efficiency providers, solar installers, or other vendors/matters) and include a short summary in their electric service quality reports due April 1, 2020. (*Staff*)
  - f. Direct utilities to examine the definition of customer complaint as described in these briefing papers and provide a short summary of their



observations and conclusions in their electric service quality reports due April 1, 2020. *(Staff)*

4. Minnesota Power's Reconnect Pilot Program
  - a. Approve the Reconnect Pilot Program *(Minnesota Power)*
  - b. (If approved) Require MP to submit annual compliance filings detailing the costs, and cost savings realized from the Pilot, both from the Company's and the customers' perspectives in future service quality reports. *(Department)*
  - c. Reject the Reconnect Pilot Program *(Energy Cents Coalition, Legal Services Project, CUB and the Citizens Federation, and Department)*
  - d. Take No Action on the Reconnect Pilot Program
5. Direct utilities to engage in a dialogue with Commission staff and stakeholders on the Emergency Medical Account Status protection as outlined in Minn. Stat. §216B.098 subd. 5 and reported in Minn. Rule 7826.1800. *(Staff)*