

August 15, 2025

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

RE: Reply Comments of the Minnesota Department of Commerce  
Docket No. E, G-002/M-12-383 and E, G-002/CI-02-2034

Dear Mr. Bull:

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

*In the Matter of an Investigation and Audit of Service Quality Reporting –  
Fraudwise Report*

*In the Matter of the Petition of Northern States Power Co. d/b/a Xcel  
Energy for Approval of Amendments to its Natural Gas and Electric Service  
Quality Tariffs Originally Established in Docket No. E, G-002/CI-02-2034*

The Petition was filed by Xcel Energy (Xcel or the Company) on May 15, 2025.

The Department recommends the Commission accept Xcel Energy's 2024 Annual QSP report with modifications. The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

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

KB/RW/YZ/ar  
Attachment

## Before the Minnesota Public Utilities Commission

### Comments of the Minnesota Department of Commerce

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Docket Nos. E, G002/M-12-383 and E, G002/CI-02-2034

#### I. INTRODUCTION

The Department filed its initial comments on this matter on July 22, 2025, to address many of the notice topics and cited the need for additional information from Xcel before completing its review of Xcel's filing. On July 14, 2025, the Department issued Information Requests (IR) to Xcel to acquire a detailed explanation of the Company's Live Chat function operations and additional data on the complaint coefficient to further analyze Xcel's proposed update to the customer complaints standard. These comments respond to the two outstanding notice topics where the Department positions were pending responses to the Department's IRs:

- Should the Commission approve Xcel Energy's proposal to use 50% of the Customer Complaint underperformance penalty for bill credits to past due customers?
- Should the Commission approve Xcel Energy's proposal to update the customer complaints standard to less than or equal to 0.649 complaints per 1000 customers?

The Department also provides a response to the following notice topic:

- Should the Commission require an inflation adjustment to the underperformance penalty per the Commission's October 9, 2024, Order?

#### II. PROCEDURAL BACKGROUND

August 12, 2013	The Public Utilities Commission (Commission) issues an Order approving a customer complaint performance threshold of $\leq 0.2059$ per 1,000 customers. <sup>1</sup>
February 18, 2021	The Commission issues an Order under which Xcel pays an underperformance penalty due to exceeding the threshold for customer complaints. <sup>2</sup>

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<sup>1</sup> *In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Amendments to its Natural Gas and Electric Service-Quality Tariffs, In the Matter of an Investigation and Audits of Northern States Power Company's Service-Quality Reporting*, Commission, Order Approving Amendments to Service-Quality Tariff, August 12, 2013, Docket No. E,G-002/CI-02-2034, (eDockets) [20138-90198-02](#), (hereinafter "August 12, 2013 Order").

<sup>2</sup> *In the Matter of an Investigation and Audits of Northern States Power Company's Service-Quality Reporting, In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Amendments to its Natural Gas and Electric Service-Quality Tariffs*, Commission, Order Accepting Filing and Denying Request to Exclude Complaints, February 18, 2021, Docket No. E,G-002/CI-02-2034, (eDockets) [20212-173621-02](#).

October 9, 2024	The Commission issues an Order requiring Xcel to pay an underperformance penalty for exceeding the threshold for customer complaints. The Commission directs parties to discuss redistribution of underperformance payments on customer bills and adjustment of the penalty for inflation in the 2024 QSP [...] <sup>3</sup>
May 15, 2025	Xcel files the 2024 QSP annual report with a proposed disbursement plan and tariff modifications. The Company reports exceeding the established thresholds for customer complaint levels and telephone response time. <sup>4</sup>
June 6, 2025	The Commission posts a notice of comment period for the annual report. <sup>5</sup>
July 14, 2025	The Department issued Information Requests to Xcel.
July 22, 2025	The Department filed initial comments in E, G002/M-12-383 and E, G002/CI-02-2034.

### III. DEPARTMENT ANALYSIS

#### A. 50% OF PENALTY FOR LIVE CHAT FUNCTION

The Department responds to the following notice topic:

*Should the Commission approve Xcel Energy's proposal to use 50% of the Telephone Response Time underperformance penalty for deployment of its Live Chat function?*

##### A.1 Live Chat Function

In Xcel's 2024 Annual Report Xcel proposes to use 50 percent of the Telephone Response Time underperformance penalty for deployment of its Live Chat function.<sup>6</sup> In response to the Department's IR 12 about current costs of the pilot, Xcel stated that the deployment of the Live Chat with 31 agents to handle chat contacts for July-December 2025 is estimated to cost an additional \$861,000 (or \$143,500

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<sup>3</sup> *In the Matter of an Investigation and Audits of Northern States Power Company's Service-Quality Reporting, In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Amendments to its Natural Gas and Electric Service-Quality Tariffs*, Commission, Order Accepting Filing and Denying Request to Exclude Complaints, Commission, Order on Distribution of Underperformance Penalty, October 9, 2024, Docket No. E, G-002/CI-02-2034, (eDockets) [202410-210844-02](#) (hereinafter "October 9, 2024 Order").

<sup>4</sup> *2024 Annual Report Quality of Service Plan (QSP) Tariff*, Xcel Energy, Initial Filing, May 15, 2025, Docket No. E, G-002/CI-02-2034, (eDockets) [20255-218968-01](#), (hereinafter "2024 QSP Report").

<sup>5</sup> *In the Matter of an Investigation and Audit of Service Quality Reporting – Fraudwise Report, In the Matter of the Petition of Northern States Power Co. d/b/a Xcel Energy for Approval of Amendments to its Natural Gas and Electric Service Quality Tariffs*, Notice of Comment Period, June 6, 2025 Docket No. E, G-002/CI-02-2034, (eDockets) [20256-219663-01](#).

<sup>6</sup> 2024 QSP Report at 10.

per month).<sup>7</sup> Furthermore, in response to the Department's IR 24 about future costs, Xcel indicated that the ongoing costs for Live Chat functionality on a monthly basis would fluctuate. Xcel stated that the current cost per chat interaction is \$6.27 or \$32,600 monthly.<sup>8</sup> Based on this estimate, the Department's understanding is that the ongoing cost of the Live Chat's functionality per year is \$391,200.

Given these uncertainties, the Department remains concerned about the potential impact of costs to ratepayers in future years. While the underperformance penalty represents a one-time funding source, the Live Chat function introduces a recurring and potentially increasing cost.

Additionally, the Department finds that Xcel has not demonstrated that the Live Chat function improves customer service efficiency at this time. On average it takes approximately twice as long to handle a customer request via Live Chat compared to a phone call. The pilot launch in April 2025 showed an average handle time (AHT) of 683 seconds while the average phone call AHT average was 315 seconds. In June 2025, the average dropped to 643 seconds, reflecting a nearly 6 percent improvement.<sup>9</sup> However, the Department remains uncertain about the Live Chat function's impact on customer wait times, given the limited amount of data. Alternatively, as suggested by the Office of Attorney General – Residential Utilities Division (OAG-RUD), Xcel could either return the \$500,000 to ratepayers as contemplated by the QSP tariff or discuss a more targeted proposal with stakeholders.<sup>10</sup>

**The Department recommends that the Commission deny Xcel's request to use 50% of the Telephone Response Time underperformance penalty for deployment of its Live Chat function.**

#### *A.2. Reporting of Telephone Response Times*

The Department shares the concerns raised by Citizen Utility Board of Minnesota (CUB) in its initial comments regarding the reporting of telephone response times. The Department agrees with CUB's assessment that inclusion of calls answered by Interactive Voice Response (IVR) software weakens the intent 80/20 standard due to the average zero second answer speed by the software.<sup>11</sup> Further, as discussed by CUB, Xcel does not report, in either its QSP Report or in its Annual SRSQ Report, the average response time if the call is not answered in 20 seconds.<sup>12</sup> The Department concludes that reporting of the average response time if the call is not answered within 20 seconds would provide additional transparency into Xcel's call center practices.

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<sup>7</sup> Xcel response to Department IR 12 at 1.

<sup>8</sup> Xcel response to Department IR 24 at 1.

<sup>9</sup> Xcel response to Department IR 24 at 2.

<sup>10</sup> *In the Matter of an Investigation and Audits of Northern States Power Company's Service-Quality Reporting, In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Amendments to its Natural Gas and Electric Service-Quality Tariffs*, Office of Attorney General, Initial Comments, July 22, 2025, Docket No. E, G-002/CI-02-2034, (eDockets) [20257-221293-02](#) at 10.

<sup>11</sup> *In the Matter of an Investigation and Audits of Northern States Power Company's Service-Quality Reporting, In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Amendments to its Natural Gas and Electric Service-Quality Tariffs*, Citizens Utility Board of Minnesota, Initial Comments, July 22, 2025, Docket No. E, G-002/CI-02-2034, (eDockets) [20257-221295-02](#) at 7 (hereinafter "CUB Initial Comments").

<sup>12</sup> *Ibid.*

**The Department recommends the Commission require Xcel to report in its QSP Annual Report and its Annual SRSQ Report, the average telephone response time if a call to the Company's call center or its business office is not answered within 20 seconds.**

**B. CUSTOMER COMPLAINTS STANDARD**

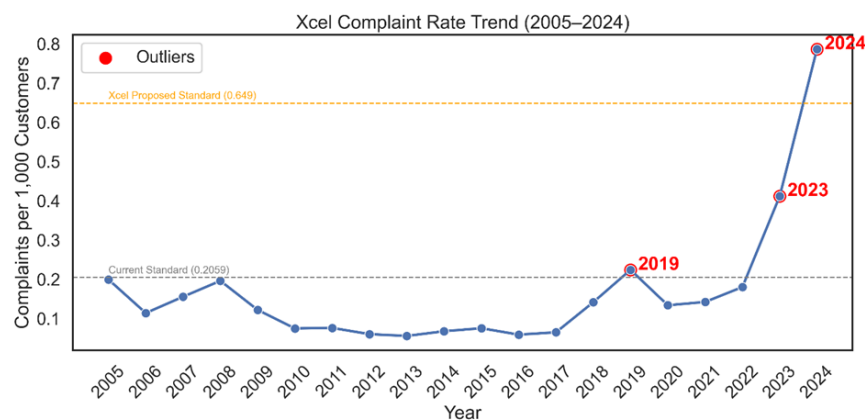
The Department responds to the following notice topic:

*Should the Commission approve Xcel Energy's proposal to update the customer complaints standard to less than or equal to 0.649 complaints per 1000 customers?*

**B.1 Calculation of the Standard**

In its 2024 QSP annual report, Xcel Energy argued that the existing customer complaint performance standard of 0.2059 complaints per 1,000 customers no longer reflects the complexity of its operations.<sup>13</sup> The Company cites instances in 2019, 2023, and 2024 when complaint levels surpassed the threshold as justification for updating the standard, which was originally developed using data from 2005 through 2011. However, a review of the full historical trend from 2005 through 2024 shows that complaint rates remained consistently below the current standard through 2022. As shown in the figure below, the complaint rate rises sharply in 2023 and again in 2024, reaching 0.41 and 0.79 complaints per 1,000 customers, respectively. These values represent a distinct break from the preceding trend. The increase is not gradual or persistent over time but rather reflects a sudden deviation from nearly two decades of consistent performance. Moreover, Xcel's proposed new standard of 0.649 complaints per 1,000 customers lies well above nearly all historical data points in the trend line and aligns closely with the two highest outliers. The Department is concerned that the Company's proposal would normalize exceptional years rather than reflect typical performance.

Figure 1: Xcel Complaint Rate Trend<sup>14</sup>

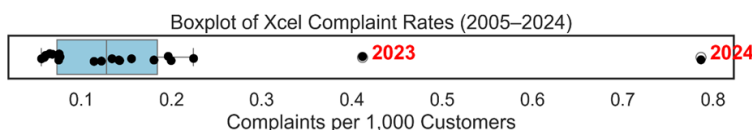


<sup>13</sup> 2024 QSP Report at 2.

<sup>14</sup> Xcel response to Department IR 25 at Attachment A at 2.

A boxplot of the same dataset provides further evidence that 2023 and 2024 are outliers. A boxplot summarizes the distribution of data by showing the interquartile range, which spans from the 25th percentile to the 75th percentile, and the median. Any points beyond this range are plotted individually and considered statistical outliers. As shown in the figure below, all years prior to 2023 fall within a narrow and predictable range, while the values for 2023 and 2024 lie well beyond the whiskers. Although Xcel has proposed a new threshold of 0.649 complaints per 1,000 customers using data from 2018 through 2024, this proposed standard is heavily influenced by the same extreme values in 2023 and 2024. The Department notes that including 2023 and 2024 in the recalculation artificially inflates the standard and diminishes its effectiveness as a performance benchmark.

Figure 2: Boxplot of Xcel Complaint Rates



**The Department recommends that the Commission deny Xcel Energy’s proposal to update the customer complaints standard to less than or equal to 0.649 complaints per 1000 customers.**

#### *B.2. Tiered Penalty Structure*

To better align performance incentives with customer service outcomes, the Department recommends replacing the current flat penalty structure with a tiered framework that reflects the severity of Xcel’s annual complaint rate relative to the existing standard of 0.2059 complaints per 1,000 customers. Under the existing Quality of Service Plan, Xcel incurs a base penalty of \$1,000,000 if it exceeds the complaint threshold at any point in the year. This structure does not differentiate between minor and major violations and provides no incentive for the Company to improve its performance once the threshold is crossed. The proposed framework introduces three penalty tiers, each tied to specific levels of noncompliance. Tier 1 applies if Xcel’s annual complaint rate exceeds the current standard and results in the base penalty alone. Tier 2 applies if the complaint rate exceeds the standard by 50 percent, from 0.3089 and up to a maximum of 0.4118, and results in a penalty equal to 1.5 times the base amount. Tier 3 applies if the complaint rate exceeds the standard by 100 percent or more and results in a penalty equal to double the base amount. The base penalty is subject to change if the Commission approves an inflation adjustment. This structure ensures that penalties scale with the severity of performance shortfalls and encourages the Company to maintain a consistent focus on service quality.

Table 1: Department Proposed Tiered Penalty Structure

Tier	Annual Complaint Rate Relative to Standard (0.2059)	Penalty Trigger Complaint Rate	Total Penalty
Tier 1	Exceeds standard	0.2059	Base Penalty
Tier 2	Exceeds standard by 50%	0.3089	Base Penalty * 150%
Tier 3	Exceeds standard by 100%	0.4118	Base Penalty * 200%

**The Department recommends that the Commission adopt the proposed 3-tier penalty structure subject to any base penalty adjustments.**

*C. INFLATION ADJUSTMENT*

The Department responds to the following notice topic:

*Should the Commission require an inflation adjustment to the underperformance penalty per the Commission’s October 9, 2024, Order?*

The Department reviewed the comments from other parties and supports CUB’s recommendation to adjust the underperformance penalty for inflation.

As CUB notes, the \$1,000,000 penalty approved in 2013 is equivalent to \$1,383,397 in 2025 dollars, which reflects an increase of over 38 percent. This upward trend is expected to continue, with inflation estimates for 2025 and 2026 at approximately 2.9 and 3.2 percent, respectively.<sup>15</sup>

In its August 12, 2013, *Order Approving Amendments to Service-Quality Tariff*, the Commission approved Xcel’s proposed revisions to its underperformance penalty; the penalty was ratcheted down because Xcel met its benchmarks consistently for the past seven years.<sup>16</sup> Therefore, if the Company is no longer consistently meeting its benchmarks, the Department finds it reasonable for the Commission to revise the penalty amount. The Department concludes it is reasonable to require an inflation adjustment to the underperformance penalty.

**The Department recommends that the Commission require an inflation adjustment to the underperformance penalty per the Commission’s October 9, 2024, Order.**

<sup>15</sup> CUB Initial Comments at 9.

<sup>16</sup> August 12, 2013 Order at 4.

#### D. CCO EXPENSES

In Xcel's ongoing rate case, Xcel Witness Lindgren states that the Company's Customer Care Organization's (CCO) O&M expenses have been decreasing since 2021.<sup>17</sup> Xcel states that the total 2025 CCO test year O&M expense of \$27.3 million decreases by 15% of the spending level observed in 2021.<sup>18</sup> Lindgren attributes the decrease to renegotiations of vendor contracts for meter reading activities in addition to anticipated savings due to AML.<sup>19</sup> Lindgren states additional decreases are forecasted for 2026.<sup>20</sup> Lindgren states that customer satisfaction, as measured by the Company's Voice of the Customer (VOC) Transaction Survey, remains high, but has slightly decreased in 2023 and again in 2024 as shown in Xcel Table 2 below.<sup>21</sup> Lindgren ties the decrease in customer satisfaction to longer call response times and the need to address large, extended storm outages.<sup>22</sup>

**Table 2**  
**Voice of the Customer Transaction Survey – Minnesota Electric**

	2021	2022 Q1-Q2	2022 Q3-Q4	2023	2024 Jan- Aug
Overall Satisfaction with Transaction	82%	83%	79%	76%	71%
IVR Overall Satisfaction with Transaction	82%	80%	77%	78%	68%

*Source: Lindgren Direct Testimony at 12.*

As shown in the Department's Figure 1 in section III.B.1. above, the customer complaints reported by Xcel in the instant docket have trended upward from 2021 to 2024—the same years Xcel witness Lindgren reports the decrease in CCO O&M expenses. The Department is concerned by the correlation in the decrease in CCO O&M expenses and the increased number of customer complaints.

#### 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.

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<sup>17</sup> *In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in Minnesota*, Xcel Energy, November 1, 2024, Direct Testimony and Schedules of Nora C. Lindgren, Docket Nos. E002/GR-24-320, E002/GS-24-321, (eDockets) [202411-211516-04](#), (hereinafter "Lindgren Direct Testimony") at 10

<sup>18</sup> Lindgren Direct Testimony, at 10.

<sup>19</sup> *Ibid.*

<sup>20</sup> *Ibid.*

<sup>21</sup> Xcel Table 2, Lindgren Direct Testimony at 12.

<sup>22</sup> Lindgren Testimony, at 12.



*A. 50% OF PENALTY FOR LIVE CHAT FUNCTION*

- A.1. The Department recommends that the Commission deny Xcel's request to use 50% of the Telephone Response Time underperformance penalty for deployment of its Live Chat function.
- A.2. The Department recommends the Commission require Xcel to report in its QSP Annual Report and its Annual SRSQ Report, the average telephone response time if a call to the Company's call center or its business office is not answered within 20 seconds.

*B. CUSTOMER COMPLAINT STANDARD*

- B.1. The Department recommends that the Commission deny Xcel Energy's proposal to update the customer complaints standard to less than or equal to 0.649 complaints per 1000 customers.
- B.2. The Department recommends that the Commission adopt the proposed 3-tier penalty structure subject to any base penalty adjustments.

*C. INFLATION ADJUSTMENT*

- The Department recommends that the Commission require an inflation adjustment to the underperformance penalty per the Commission's October 9, 2024, Order.

## Attachments

- ☐ Not-Public Document – Not For Public Disclosure  
☐ Public Document – Not-Public Data Has Been Excised  
☒ Public Document

Xcel Energy Information Request No. 12  
Docket Nos.: E,G002/CI-02-2034 and E,G002/M-12-383  
Response To: Minnesota Department of Commerce  
Requestor: John Kundert  
Date Received: May 22, 2025

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Question:

Topic: Live Chat implementation

Reference(s): Docket No: E,G002/M-12-383 - QSP 2024 Annual Compliance Filing, filed May 15, 2025 , page 5

1. Please provide all information regarding program costs (capital and expense) and the current timeline for implementation of the Live Chat function.
2. Provide support for the statement:
  - a. “Time underperformance payment to accelerate deployment of the Live Chat function, should allow the Company to restore performance on this metric”.

Response:

1. Page 9-10 of the filing details the Company’s proposal for 50 percent of the Telephone Response Time underperformance payment and includes an estimate of \$950,000 for the operating and maintenance costs to train agents and expand the small pilot described in our QSP annual report into full deployment for the last six months of 2025. As of May 27, the Company is two months into implementation of the pilot, and customer satisfaction results continue the positive trend observed right after it began. Customer Care’s labor expenses associated with training agents to prepare for the live agent chat pilot as well as staffing agents for the three months of the pilot are approximately \$91,000. Deployment with 31 agents to handle chat contacts for July-December 2025 is estimated to cost an additional \$861,000. None of the estimated costs outlined in this response are considered capital.
2. The impact to inbound telephone calls (and hence the Telephone Response Time metric) via the addition of a live agent chat option will not be available until the pilot progresses for several more weeks, but is assumed to be an overall reduction because a portion of customers who would otherwise call will choose the convenience of chat. An anticipated benefit of this shift in customer contact channels will be improvements in employee satisfaction and agent retention from

2024 levels due to lower call volumes for agents to manage. The associated impacts will be shorter, more effective calls, as well as reductions in hiring replacement agents as staffing supply more appropriately matches call demand. The Company anticipates successfully deploying the live agent chat option will enable customers to choose a contact method that is convenient to them and will allow the Company to address recent staffing and recruiting shortfalls and restore the telephone response time performance metric to pre-2024 levels.

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Preparer: Jason Perreira  
Title: Sr. Mgr., Analytics and Work Force Management  
Department: Customer Care Analytics and Work Force  
Telephone: 651-639-4502  
Date: June 2, 2025

- ☐ Not-Public Document – Not For Public Disclosure  
☐ Public Document – Not-Public Data Has Been Excised  
☒ Public Document

Xcel Energy Information Request No. 24  
Docket No.: E,G002/M-12-383  
Response To: Minnesota Department of Commerce  
Requestor: Rachel Wiedewitsch, Krystal Binversie  
Date Received: July 14, 2025

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Question:

Topic: 2024 QSP Report

Reference(s): Live Chat Function, page 10

1. After full deployment of the Live Chat function estimated to cost \$950,000, what are the ongoing costs of the functionality per year?
2. Xcel states that initial results of its piloted Live Chat function “indicate that it does take longer to complete requests through this channel due the typing required by both customers and agents; however, agents are currently able to complete two chats simultaneously.”
  - a. On average, how much longer does it take to complete a request using the live chat function when compared to completing a request over the phone?
    - i. Please provide the average amount of time it takes to complete a request when the request is received by phone compared to the average amount of time it takes to complete a request when the request is received via the Live Chat function.
    - ii. How has the average time to complete a request received via the Live Chat function improved, worsened, or remained the same over the length of the pilot?

Response:

1. Considering the current volume of Live Chat interactions over the first four months of implementation, the Company estimates that ongoing costs for maintaining Live Chat on a monthly basis would fluctuate. Currently the cost per chat interaction is \$6.27 or \$32,600 Monthly.
2.
  - a. On average it takes approximately twice as long to handle a customer request via Live Chat compared to a phone call. However, this comparison does not fully capture the operational efficiency of the Live Chat channel. While Live Chat interactions require more time due to typing back-and-forth exchanges, especially for complex or compounding customer requests, agents are able to manage two chats simultaneously, effectively doubling their productivity per unit of time. This parallel handling capability

offsets the longer individual handle times.

Live Chat offers a scalable and flexible channel that enhances customer experience and agent efficiency. The ability to handle multiple chats concurrently means that agents can assist customers in aggregate. Additionally, Live Chat helps divert volume from the phone channel, which furthers the goal of reliably reaching the Company's Quality of Service Plan (QSP) tariff Telephone Response Time (TRT) metric to the standard of 80 percent of calls answered in under 20 seconds. Overall, this Live Chat offers customers a convenient, desirable, and accessible alternative to getting inquiries resolved without the need for a traditional phone call.

i. In June 2025, the Average Handle Time (AHT) for Live Chat was 643 seconds while the average phone call AHT average was 315 seconds. The AHT for Live Chat and for Phone interactions are not equal in weight for the reasoning explained above in answer 2.

ii. Since the pilot's launch in April 2025 through the end of June 2025, the Live Chat Average Handle Time (AHT) improved by about 6 percent when comparing 683 seconds in April to 643 seconds in June. This improvement reflects ongoing refinements to Live Chat functionality as well as increased agent proficiency with the platform.

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Preparer:	Randy Cantu
Title:	Sr Dir, Contact Center Operations
Department:	Contact Center Amarillo
Telephone:	806-354-6454
Date:	July 24, 2025

- ☐ Not-Public Document – Not For Public Disclosure  
☐ Public Document – Not-Public Data Has Been Excised  
☒ Public Document

Xcel Energy	Information Request No.	25
Docket No.:	E,G002/M-12-383	
Response To:	Minnesota Department of Commerce	
Requestor:	Rachel Wiedewitsch, Krystal Binversie	
Date Received:	July 14, 2025	

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Question:

Topic: 2024 QSP Report

Reference(s): Department Information Request No. 16

Xcel provided Attachment A to its response to Department Information Request No. 16.

1. Please provide the same information contained within Attachment A for the years of 2005 to 2024.
2. Please provide the response as a excel spreadsheet with formulas intact. If the spreadsheet links to other relevant spreadsheets, provide those spreadsheets as well, with all formulas intact.

Response:

Please see Attachment A.

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Preparer:	Matthew Morse
Title:	Principal Rate Analyst
Department:	NSPM Regulatory
Telephone:	612-216-8167
Date:	July 24, 2025

NSPM Response to DOC-16, Support of Table 5

Method 1 based on complaint coefficient

Year	2018	2019	2020	2021	2022	2023	2024
Complaints	248	396	239	257	329	759	1,468
Customers	1,749,610	1,765,009	1,782,616	1,803,740	1,823,345	1,843,237	1,865,879
Complaint Coefficient	0.1417	0.2244	0.1341	0.1425	0.1804	0.4118	0.7868

	AVG	STDDEV S	AVG+1.5STD DEV S	Complaint threshold
2018-2024	0.2888	0.2401	0.649	1,211
2020-2024	0.3311	0.2790	0.750	1,399
2022-2024	0.4597	0.3060	0.919	1,714

Method 2 based on complaint count

Year	2018	2019	2020	2021	2022	2023	2024
Complaints	248	396	239	257	329	759	1,468
Customers							1,865,879

	Average # of complaints	+1.5 STDDEV.S	Complaint threshold	Corresponding complaints per 1000 customers
2018-2024	528	679	1,207	0.647
2020-2024	610	786	1,397	0.749
2022-2024	852	863	1,715	0.919

The Company acknowledges using two different methods to calculate figures in Table 5, which yields a small difference between the two methods.



NSPM Response to OAG-25

Year	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Complaints	316	183	253	321	201	124	127	101	94	115	129	102	113	248	396	239	257	329	759	1,468
Customers	1,582,960	1,601,614	1,623,858	1,634,948	1,644,645	1,653,793	1,663,129	1,670,919	1,681,229	1,693,811	1,707,542	1,721,129	1,734,936	1,749,610	1,765,009	1,782,616	1,803,740	1,823,345	1,843,237	1,865,879
Complaint Coefficient	0.1996	0.1143	0.1558	0.1963	0.1222	0.0750	0.0764	0.0604	0.0559	0.0679	0.0755	0.0593	0.0651	0.1417	0.2244	0.1341	0.1425	0.1804	0.4118	0.7868

**Minnesota Public Utilities Commission**  
**Consumer Affairs Office**  
**121-7th Place East**  
**St. Paul, MN 55101-2147**

**XCEL ENERGY TARIFF SERVICE QUALITY PLAN**  
**SUMMARY OF CUSTOMER COMPLAINTS**

For the period of January 01, 2025 to July 10, 2025

Filed in accordance with Docket No. E, G002/CI-02-2034 & E, G002/M-12-383

**Name of Utility:** Northern States Power Company, a Minnesota Corporation

**Address:** 3115 Centre Pointe Drive, Roseville, MN 55113

**Prepared by:** Robert Duenes, Customer Advocate Analyst, Customer Care (806) 513-1493

	1	2	3	4	5	6	7	Total	Standard
Customer Complaints to PUC									
Billing & Credit	72	23	46	29	135	81	35	421	
Customer Service	3	5	10	5	7	4	0	34	
Meter Reading	1	2	0	0	0	0	0	3	
Reliability-Duration	1	0	0	0	1	0	0	2	
Reliability-Frequency	1	0	0	0	3	7	7	18	
Trouble Orders	0	0	0	0	2	0	0	2	
Other	20	18	23	14	25	29	10	139	
Monthly	98	48	79	48	173	121	52	619	
YTD	98	146	225	273	446	567	619		NA

## **CERTIFICATE OF SERVICE**

I, Nicole Westling, 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 Nos. E, G-002/M-12-383; E, G-002/CI-02-2034**

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

**/s/Nicole Westling**

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar		721 W 26th st Suite 211 Minneapolis MN, 55405 United States	Electronic Service		No	12-383Official
2	Laura	Beaton	beaton@smwlaw.com	Shute, Mihaly & Weinberger LLP		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	12-383Official
3	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	12-383Official
4	Olivia	Carroll	oliviac@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St W1360 St. Paul MN, 55101 United States	Electronic Service		No	12-383Official
5	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	12-383Official
6	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	12-383Official
7	Allen	Gleckner	agleckner@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	12-383Official
8	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	12-383Official
9	Craig	Johnson	cjohnson@lmc.org	League of Minnesota Cities		145 University Ave. W. Saint Paul MN, 55103-2044 United States	Electronic Service		No	12-383Official
10	Cliff	Kaehler	cliff.kaehler@novelenergy.biz	Novel Energy Solutions LLC		4710 Blaylock Way Inver Grove Heights MN, 55076 United States	Electronic Service		No	12-383Official

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11	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	12-383Official
12	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	12-383Official
13	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	12-383Official
14	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	12-383Official
15	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	12-383Official
16	George	Shardlow	george@energycents.org	Energy CENTS Coalition		823 E. 7th Street Saint Paul MN, 55106 United States	Electronic Service		No	12-383Official
17	Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	12-383Official
18	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	12-383Official

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1	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	2-2034
2	Olivia	Carroll	oliviac@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St W1360 St. Paul MN, 55101 United States	Electronic Service		No	2-2034
3	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	2-2034
4	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		Yes	2-2034
5	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	2-2034
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7	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	2-2034
8	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	2-2034
9	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	2-2034
10	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	2-2034
11	Rebecca S.	Winegarden	beckwine@msn.com	Unknown		10555 Union Terrace Ln N Maple Grove MN, 55369-2622	Electronic Service		No	2-2034

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