414 Nicollet Mall
Minneapolis, Minnesota 55401

September 2, 2020

—Via Electronic Filing—

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: REPLY COMMENTS
2019 ANNUAL SERVICE QUALITY REPORT
DOCKET NO. E002/M-20-406

Dear Mr. Seuffert:

Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy, submits the enclosed Reply Comments according to the schedule established in the Minnesota Public Utilities Commission's August 18, 2020 Amended Second Notice of Extended Comment Period in the above-referenced docket.

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service list. Please contact me at 612-330-6935 or gail.baranko@xcelenergy.com, or Pamela Gibbs at pamela.k.gibbs@xcelenergy.com or 612-330-2889 if you have any questions regarding this filing.

Sincerely,

/s/

GAIL A. BARANKO
REGULATORY MANAGER

Enclosures
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Joseph K. Sullivan	Vice Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF XCEL ENERGY'S COMPLIANCE WITH ANNUAL SAFETY, RELIABILITY, AND SERVICE QUALITY METRICS FOR 2019	DOCKET NO. E002/M-20-406
	REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits these Reply Comments according to the schedule established in the Minnesota Public Utilities Commission's August 18, 2020 Amended Second Notice of Extended Comment Period and in response to the comments submitted by other parties.

We appreciate the Department of Commerce's (Department) thorough review of our 2019 Annual Report on Safety, Reliability and Service Quality (2019 Service Quality Report). In this Reply, we first respond to the Department's recommendations and questions in the order they were presented in the Department's comments. Several other parties commented on the Staff's proposal for locational reliability, service quality, and equity metrics (Attachment A to the Commission's April 20, 2020 Notice) – the remainder of these Reply Comments address the comments provided by the City of Minneapolis, the Suburban Rate Authority (SRA), and the Environmental Law & Policy Center and Vote Solar (ELPC/VS).

REPLY COMMENTS

I. RESPONSE TO THE DEPARTMENT

A. Payments for Qualifying Property Damage Claims

The Department noted that the amount of payments for qualified property damage claims in 2019 increased significantly to $1,203,379 and that it appears that three unusually large payments caused this increase. The Department requested the following regarding these three claims:

> *"The Department requests that Xcel address this issue in Reply Comments by identifying the following:*
>
> • *the circumstances surrounding these claims,*
> • *whether Xcel has taken any action to prevent a reoccurrence of such circumstances,*
> • *whether the Company expects to pay out larger claims with more frequency in future years, and*
> • *any other information the Company believes is relevant."*

Attachment A to the 2019 Service Quality Report lists payments made in 2019 by Xcel Energy for qualifying property damage claims. There are two payments that are significantly higher than our typical reimbursements, and these two claims make up the vast majority of payments made in 2019, which total $1,203,379.

First, on October 28, 2015, an equipment operator was working on a demolition project in Brooklyn Park, Minnesota. He claimed that an electric transformer cabinet nearby, owned by NSPM, was unlocked and that the door was banging open in the wind. He attempted to shut the door and, in doing so, claimed he was blown back from the transformer by an arc flash. He consequently sued NSPM. Liability was disputed, and the parties reached a confidential settlement agreement at mediation.

Second, on August 5, 2016, a telecommunications worker was performing work on an overhead utility pole owned by NSPM, which, in addition to holding NSPM electrical facilities, also held telecommunication lines. During the course of his work, the telecommunications employee received electrical contact injuries. The cause of his accident was disputed, and the parties agreed to a confidential settlement of the claims during mediation.

The next highest payment for a qualifying claim in 2019 was only slightly higher than our typical reimbursement amount for property damage claims. This payment was related to a leaking plumbing supply line that had been an issue in March 2014, as well as in March 2015 and February 2017. NSPM disputed liability, and the parties ultimately agreed to a confidential settlement during mediation in 2019.

The safety of the public and our employees is a top priority for us. As a company, each year we send out safety messaging to educate our customers and the public about electric safety. We also send safety messaging to specific industries that may be at risk of contact in our electric facilities, such as excavation companies, roofing and siding companies, tree workers, and so forth. We use the following communication channels for safety messaging: broadcast TV, streaming TV (i.e. Hulu), terrestrial radio (AM/FM), streaming audio (i.e. Pandora), digital video, digital display (banner ads), paid social media, paid search, and bill onsert safety messages. The Company website also has a section dedicated to public safety: https://www.xcelenergy.com/community/public_safety.

It is important to note that, with respect to the payments identified by the Department as paid out in 2019, the two large claims originated from two different prior years – 2015 and 2016 – and do not reflect a recent trend in 2019. It often takes years to resolve claims of this nature. Unfortunately, electric contact events happen every year despite our efforts to educate the public about the dangers of getting too close to electric facilities. While we cannot say with certainty whether settlement payouts will increase or decrease from 2019 levels in the future; at this point, we do not believe there is an upward trend.

Additionally, we note that the way we report payments for property damage claims was changed beginning with the 2018 Service Quality Report. For 2017 and prior years, we reported data on the claims received during the reporting year and any payments made for these claims during the reporting year. Beginning with the 2018 Service Quality Report, we now report more comprehensive data on all payments made on the reporting year regardless of the year the claim was originated, or the incident happened. As a result, the number and amount of payments reported is likely higher because they also include events that happened and were reported in prior years.

B. Southeast Work Center – Hiring of New Employees

The Department requested:

> *"The Department also requests that Xcel provide an update in its Reply Comments on its progress in hiring new employees for the Southeast Work Center."*

The Company has committed to provide the Commission quarterly updates on reliability and staffing in the Southeast Work Center up until the Commission meets on the Company's 2019 Annual Service Quality Report. In our second quarterly update filed on August 3, 2020, we included the following update on hiring new employees for the Southeast Work Center:

> "In our February 27, 2020 filing, we noted that the Company has engaged in an effort to hire additional field and maintenance personnel in the Southeast Work Center and expected five additional employees to be hired by late spring of 2020. Currently, we have 53 line workers in the Southeast region. Due to COVID-19 there have been delays in the hiring process this past quarter. That said, the Company is now moving forward with the process to recruit several line workers and job offers to two linemen candidates."

The Company did hire two linemen in the Southeast Work Center area based on the job offers referenced above. However, we also lost two employees due to attrition, so the current number of line workers in the Southeast region remains 53. At this time, we are actively recruiting for four additional line worker positions in the Southeast region.

C. Proposed 2020 Reliability Standards

The Department requested:

> *"We ask that Xcel explain in its Reply Comments why the 2020 reliability goals for the following metrics and work centers changed relative to the 2019 goals:*
> - *Metro East SAIDI goal increased from 89.78 to 89.95 minutes;*
> - *Metro East CAIDI goal increased from 103.94 to 106.91 minutes;*
> - *Metro West CAIDI goal increased from 100.37 to 100.55 minutes;*
> - *Northwest SAIDI goal increased from 85.86 to 87.11 minutes;*
> - *Northwest CAIDI goal increased from 113.01 to 115.72 minutes.*

Under Minnesota Rule 7826.0600, each utility shall propose and the Commission ultimately approve "reliability performance standards in the form of proposed

numerical values for the SAIDI, SAIFI, and CAIDI for each of its work centers." As established in the Commission's April 8, 2004 Order in Docket No. E002/M-03-520,[1] the reliability performance standards that the Company has proposed for SAIDI and SAIFI generally are based on the average of the five years of historical annual results for each metric by Work Center. The CAIDI standards are calculated from the proposed SAIDI and SAIFI standards using the mathematical relationship between the indices: CAIDI = SAIDI/SAIFI. The IEEE 1366 standard used to calculate Work Center Major Event Day exclusions also uses a 5-year rolling window of data.

The annual reliability standards typically fluctuate up and down each year based on the most recent 5-year historical data. Each year, past annual values fall off the 5-year average calculation and new annual values are added to the calculation. The only exception to this traditional calculation has been when the Commission has frozen one or more Work Center reliability standards, as is the case with the Company's Southeast Work Center. The Commission has kept the Company's Southeast SAIDI and SAIFI standards at the 2017 levels and the CAIDI standard at the 2018 level.[2]

Using the above-described historical method of setting reliability standards, the 2020 standards the Company proposed in the 2019 annual filing are the direct product of the 5-year average calculations. As the 5-year average is refreshed every year with the most recent year of performance added and the oldest year eliminated, there will be natural fluctuations in the thresholds from year to year.

D. MAIFI Historical Performance

The Department requested:

> *"The Department asks the Company to explain why the MAIFI results for the Northwest and Southwest Work Centers have shown so little improvement over the past decade."*

Reported MAIFI (Momentary Average Interruption Frequency Index) is based on available data. Currently, MAIFI information can only be captured from switching devices attached to the communications network (e.g., substation equipment). MAIFI information that is collected from the sprawling low customer density Northwest and

[1] ORDER ACCEPTING REVISED SERVICE QUALITY PERFORMANCE REPORT AND APPROVING REVISED SERVICE QUALITY GOALS FOR 2003, May 8, 2004, *In the Matter of Xcel Energy Proposed Reliability Performance Standards for 2003*.

[2] Docket No. E002/M-18-239, ORDER ACCEPTING REPORT, SETTING 2018 RELIABILITY STANDARDS, AND SETTING FUTURE REPORTING REQUIREMENTS, March 19, 2019; Docket No. E002/M-19-261, ORDER ACCEPTING REPORTS, ESTABLISHING RELIABILITY STANDARDS, AND REQUIRING ADDITIONAL FILINGS, January 28, 2020.

Southeast service areas are heavily impacted by transmission level interruptions. Unlike the metro areas, significant pieces of the transmission system in Northwest and Southeast areas are served by radial lines and intermediate circuit taps similar to the distribution system and are more susceptible to momentary interruptions. The Company has listed several transmission projects in the Relief and Recovery proposal for the Northwest and Southeast areas that are expected to improve reliability, including reducing momentary interruptions. The Company is also investigating installation of automatic switching devices on the 69kV radial transmission system to isolate issues to a smaller group of customers. This work on the transmission system is expected to reduce the number of customers experiencing a longer interruption while increasing the number of customers experiencing momentary interruptions. The Company will continue to investigate opportunities to improve the reliability in the Northwest and Southeast areas including reducing the number of momentary interruptions.

At this time, the true value of MAIFI experienced by customers is unknown. The ability to capture true MAIFI information for use as a tool for customer service improvement will come with the future deployment of Advanced Metering Infrastructure (AMI); we expect the implementation of AMI will be complete in 2024.

E. Residential Customer Involuntary Disconnections – Payment Plans

The Department requested:

> *"The Department asks that Xcel provide some additional information as to the significant increase in the number of [residential] customers entering payment plans in 2019 in its Reply Comments."*

In late 2018 and early 2019, our Customer Care business area focused on improving the existing payment plan negotiations process, based on concerns identified internally and also raised by the Commission's Consumer Affairs Office (CAO). We engaged key stakeholders to create short- and long-term plans to enhance the customer experience and to provide a more supportive payment plan negotiations process. We redesigned Call Center employee training to emphasize and clarify considerations for extenuating circumstances in setting payment plans. We also created a new resource tool for Call Center employees, which helps them to have consistent and compassionate conversations with customers. This tool guides employees through discussions where they may need to clarify and address extenuating circumstances, which customers may often find difficult to talk about.

As a result of this initiative, our Call Center employees were able to negotiate significantly more mutually agreed upon payment arrangements to help customers restore service and manage their Xcel Energy bills. This change is directly related to the significant increase in the number of residential customers entering payment plans in 2019.

F. Call Center Response Times

The Department requested:

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

The increase in average Call Center response time in 2019 was due to performance in three months – April, September, and October 2019 – as is demonstrated in Table 1 below. Therefore, in the 2019 Gas Service Quality Report proceeding (Docket No. G002/M-20-460), the Department requested that "the Company discuss in reply comments the reason(s) for the longer wait times in April, September and October 2019."

Table 1: Average Monthly Call Center Response Times, 2018 and 2019 (in seconds)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec	YE
2018	18	19	21	***38***	23	25	31	31	***13***	***14***	9	16	22
2019	22	20	20	***43***	15	22	27	21	***38***	***54***	10	17	27

The longer Call Center response times in April 2019 were related to the cold weather rule (CWR) protection, which ends on April 15 each year. Our credit agents received a record number of residential calls on Monday, April 15 – a total of 10,377 credit calls, which is approximately 30 percent higher than the prior daily record. We have recorded the next highest number of residential credit calls per day on April 16, 2018 (7,024 calls) and on April 17, 2017 (6,845 calls). The residential credit call activity remained high in 2019 on other days of the CWR moratorium week as well; for example, we received 5,151 credit calls on April 12; 4,459 credit calls on April 16; and

3,581 credit calls on April 17. In general, the average number of daily calls on the CWR moratorium week were 650 calls per day higher in 2019 than in 2018.

We anticipate this CWR-related peak and adjust Call Center staff workload and schedules accordingly; however, even with these efforts the response times were longer because of the very high volume of calls. In our experience, it is not prudent to hire and train contract staff for this relatively short peak that takes place once annually. We also note that our credit agent staffing in April 2019 was down five percent from April 2018, while our overall credit agent call load was up four percent from April 2018.

The longer Call Center response times in September and October 2019 were due to a large unplanned customer resource system (CRS) outage that occurred over four days, from the afternoon of September 26th to the evening of September 30th. At that time, we also informed the Commission of this event. This system outage impacted our customers' ability to conduct self-serve transactions on our website and interactive voice response (IVR) platforms, resulting in much higher call volume to our Call Center agents, who were offered approximately 96,000 calls during this 100-hour event. The increase in calls required significant staff augmentation, and approximately 70 agents provided nearly 900 additional hours of support. The higher than normal call volume also rolled over into early October.

The system outage also impacted Call Center agents' ability to process customer transactions. Because agents who answered customer calls had limited ability to process transactions instantaneously, they had to use various forms for transactions such as payments, moving requests, and systems-issued call backs. In total, over 19,000 forms were submitted for processing, creating additional work that diverted agent resources from answering incoming calls as timely as usual.

We are using these Reply Comments also as an opportunity to provide an update how COVID-19 pandemic has impacted our Call Center operations. During January and February 2020, our Call Center's phone response performance trended above goal. In March 2020, we faced the extraordinary task of transferring several hundred phone agents from in-office Company premises to working from home. Over a few weeks, we were able to transition all call agents to working from home – essentially without any impacts on performance or customers. The Commission initiated additional customer protections that prohibited many credit-related processes because of COVID-19. As a result, our Call Center received a lower overall call volume in March-May 2020. During this time, the Call Center also experienced very low staff attrition rates.

However, moving into June and continuing also in July, the Call Center began to receive higher call volumes, more in line with historical averages. At the same time, we started to experience longer call handling times as well as higher staff attrition rates. These factors have an impact on our Call Center response times; we are taking steps to hire additional agents and are actively investigating all possible factors that could be contributing to increased handle time. As the investigation remains ongoing there is not a definitive source of increased handle time that has been identified however all available actions are being taken to address potential technology concerns, and increased complexity of customer calls related to the pandemic.

G. Minor Clarification for Table 12 in the Department's Comments

We note a minor clarification regarding Table 12 and footnote 33 on the Department's Comments. We stated in our 2019 Annual Service Quality Report that the data in our prior annual reports for Table 12 (years 2008-2018) regarding customers seeking and granted CWR protection was reported at the NSPM level, including data for North Dakota and South Dakota. We provided revised Tables 12 and 13 that listed only Minnesota data for CWR protection. The Department's footnote number 33 for Table 12 therefore applies only to 2019 CWR data, not any other 2019 data components listed in the table.

H. Using IEEE Benchmarking Data for Setting Reliability Standards

The Department recommended the following:

> *"While the Department intends to provide further recommendations after reviewing the information in Xcel's Reply Comments, for now the Department recommends that the Commission:*
>
> - *reject Xcel's proposed transition from a rolling five year average to set reliability standards to benchmarking to the IEEE Reliability Working Group.*
> - *require Xcel to provide the historical company-specific information and the IEEE benchmarking analysis.*
> - *require Xcel to develop a comparative analysis using IEEE benchmarking information on an annual basis.*
> - *set Xcel's IEEE reliability goals as being in the first quartile."*

In its January 28, 2020 Order in Docket No. E002/M-19-261, the Commission required utilities to "discuss transitioning from a five-year rolling average method of proposing SAIDI, SAIFI, and CAIDI standards, to standards that are similar to the second quartile rank of similarly sized investor-owned utilities under either the IEEE benchmarking study or using United States Energy Information Administration (EIA)

reliability data." We based our proposal to use the second quartile IEEE benchmarking results on this Commission direction. Additionally, achieving the second quartile performance requires better than average reliability and is therefore an appropriate reliability goal. Performance in the second quartile or above provides a higher-than-average level of service quality and reliability. The point between the second and third quartiles marks the average reliability.

The Company is willing to develop a comparative analysis using IEEE benchmarking information and to provide this analysis annually in a supplemental filing to the Annual Service Quality Report. However, the IEEE Distribution Reliability Working Group (IEEE DRWG) does not set a date for releasing the annual benchmarking survey results. Historically, the survey results are presented at the Summer IEEE DRWG meeting held in conjunction with the IEEE Power and Energy Society General Meeting. The reliability survey results are then later posted to the public IEEE DRWG website. The Department's recommendation for a comparative performance summary within 20 days of the release of the IEEE DRWG survey results is too short of a time period, given the unscheduled release timing for the survey results and the unknown availability of utility staff at the time of the release. The Company believes that it would be reasonable to allow at least 30 days from posting on the IEEE DRWG website for submission of the comparative performance summary after the release of the survey. As a point of information, the 2020 Summer meeting of the IEEE DRWG was held on July 28, 2020. As of August 24, 2020, the 2019 performance year survey results were not yet posted on the IEEE DRWG website.

I. Variance from Minn. R. 7826.0500, Subpart 1.G

The Department recommended the following:

> *"Approve rule variance to Minn. R. 7826.0500, Subpart 1.G if needed to require, instead, that Xcel provide a report discussing any operational changes the utility made, is considering or intends to make in the future to prevent the kinds of interruptions the utility experienced in the past year and any lessons learned on restoring service more quickly in the future. At the same time, Xcel should maintain on an ongoing basis copies of all individual reports provided to the Commission's Consumer Affairs Office."*

Minn. R. 7826.0500, Subpart 1.G requires the Company to provide "a copy of each report filed under part 7826.0700." In compliance with Minn. R. 7826.0700 Subpart 1, Xcel Energy regularly sends the Commission's Consumer Affair Office (CAO) notification of sustained outages occurring at the feeder level or above, which includes reporting outages that are not necessarily large enough or long enough to meet the

definition of a major service interruption under Minn. R. 7826.0200, subp. 7. "Major Service Interruption" is defined under Minn. R. 7826.0200, subp. 7 as an interruption of service at the feeder level or above and affecting 500 or more customers for one or more hours. The Company will continue to retain copies of all individual reports of major service interruptions sent to the CAO throughout the year.

Regarding, the Department's recommendation to provide information on operational changes to prevent interruptions like those experienced in the past year and lessons learned on service restoration, we note that our Annual Report, labeled this year as Attachment D, provided similar information in response to the following Commission Orders:

- Docket No. E002/M-14-131, December 12, 2014 Order, Order Point 3: required the Company "to augment its next filing to include a description of the policies, procedures and actions that it has implemented, and plans to implement, to assure reliability, including information on how it is demonstrating pro-active management of the system as a whole, increased reliability, and active contingency planning.

- Docket No. E002/M-18-239, March 19, 2019 Order, Order Point 3.I: required the Company to include more discussion of leading causes of outages and mitigation strategies.

Attachment D describes the Company's reliability management program which looks at outage causes and trends to identify opportunities to improve reliability through programs, progress on key initiatives and improvements to existing work practices. Rather than creating a new Annual Report requirement, we propose supplementing this section with information on the leading causes of outages in the reporting year and any lessons learned.

II. LOCATIONAL RELIABILITY AND SERVICE QUALITY AND OTHER EQUITY INFORMATION

A. Introduction

The Company attempted to balance many competing internal concerns and external requests in developing the sample maps we provided in our August 17, 2020 Comments. Our goal was to:

- Offer information in a meaningful format and in a manner not presently provided;

- Be cognizant of what the average customer could quickly understand and interact with;
- Provide the appropriate range of data to allow perspective;
- Consider the need to protect grid security and customer privacy and confidentiality; and
- Be responsive to stakeholder requests for providing locational data that could be layered with additional data components (e.g., as expressed in Docket No. E002/CI-17-401).[3]

We believe the SAIDI and CEMI maps we developed on locational reliability and the CAO complaints map on service quality meet all of these goals. We also offered some potential alternatives, understanding that the sample maps may not meet all customer or stakeholder needs. For example, we offered to explore maps with actual metric values available in pop-ups as well as maps showing data on a more granular level than a zip code, such as 1,000 meters x 1,000 meters. As suggested in several comments, we are also ready to provide the same data points that we used to create the maps in a downloadable .csv file or other similar format to allow the parties to create their own maps. This will be information at the zip code level.

We are open to presenting reliability and service quality information in a variety of visual formats, but believe these sample maps are easy to understand, enable easy comparisons between geographic areas, and meet the intent of illustrating equity in reliability and service quality. We also presented the same reliability data in bubble charts as a way to demonstrate population density in each zip code. At this time, we propose that the maps and any other reported data on locational or other equity is used for informational purposes only.

We made a purposeful decision not to illustrate data in a feeder format. Presenting information at the feeder level raises significant and complex security, privacy, and confidentiality issues for both the grid and our customers. These issues have been discussed at length in relation to our Hosting Capacity Analysis (HCA), most recently submitted in Docket No. E002/M-19-685. We also do not believe feeder-level data is important to our typical customers: they do not usually know or care which feeder they are on, but rather associate with an area or neighborhood. Additionally, we chose to provide the data in the maps at the census zip code level as this allows layering other data components from the U.S. Census, such as median income.

[3] Investigation on performance-based rates (PBR) for the Company, *In the Matter of a Commission Investigation to Identify Performance Metrics, and Potentially, Incentives for Xcel Energy's Electric Utility Operation.*

The demographic census data is updated more frequently at the census zip code level,[4] but is available at a more granular level only every ten years when the decennial U.S. Census is conducted. We assumed that our stakeholders would prefer more timely data, which supports using census zip codes. Additionally, we found that roughly a quarter of the zip codes we serve have fewer than 200 customers or 40 households. With the low customer data counts, reliability performance can become skewed with changes in customer counts from year to year. Therefore, we excluded data for these zip codes in the SAIDI and CEMI maps and bubble charts. Displaying data at any further granularity would only exacerbate this issue.

We also chose to display the five-year average of historical data (2015-2019) in the reliability maps. If the reliability information is provided at the zip code level (or even more granular level) for one year only, any year-to-year variations due to weather or other one-off issues will have significant impacts and make the data appear inappropriately concerning. This approach also aligns with how the reliability standards are set based on a 5-year rolling average. We also propose to update the maps annually; again, due to seasonality variations, providing data more frequently is not useful.

SRA views communication with customers as a large component of service quality, and in its comments emphasized the importance of prompt and accurate communication regarding outages and other reliability issues. The Company presently provides communication about outages through several channels, but we are willing to explore additional communication methods with our customers in areas that experience low reliability. Enhanced communications could also include information on how we identify problem areas, analyze and design solutions, and implement improvements. This process to increase reliability takes time, and therefore customers will not experience immediate improvements in reliability. We could also explain some basic concepts, for example, although the Company strives for excellent reliability in every location, the reliability for overhead customers will generally lag underground customers and urban customers will generally have higher reliability than rural customers.

We are also interested in examining many recommendations made by the City of Minneapolis. For example, we have the capability to report and map data at the zip code level on customer disconnections and repeated outages. With regard to suggestions made by ELPC/VS, we are willing to explore how to provide additional information on poor performing feeders in a format that is useful but does not compromise customer privacy or grid security. We also have the capability to report

[4] In the U.S. Census Bureau American Community Survey.

and map at the zip code level customer participation in energy assistance and energy efficiency programs, but not at the feeder level. Providing customer data at a feeder-level on involuntary disconnections or participation in energy assistance and energy efficiency programs would raise significant customer privacy and confidentiality issues.

The parties have proposed a variety of ideas on how to report information on locational and other equity in reliability and service quality. We believe there is need for additional dialogue and next steps in order to narrow down these proposals to a clearly-defined set of data or maps that together provide a meaningful perspective, are easy to understand, do not duplicate information, and can be produced with a reasonable effort. We see the types of maps we prepared as a good starting point to do this. The maps we developed would also provide an opportunity to gain actual experience and feedback from customers and other users. Based on the feedback, all stakeholders could assess how often the maps are used by customers, what improvements could be made for presentation, if additional information is needed, and similar.

B. Response to the Parties' Comments

We respond below to some of the recommendations made in other parties' comments, but this is not a comprehensive review of all suggestions.

The City of Minneapolis proposed reporting data on involuntary disconnections by zip code/census tract under customer service quality as well as data on neighborhoods experiencing repeated outages by zip code/census tract under service reliability. We agree this information would be meaningful to customers and we have the capability to provide the data in a map or tabular format. Our sample CEMI map included information on zip code areas that had experienced six or more outages in any calendar year. We are happy to discuss further how to present disconnections and CEMI or other outage data in maps. We note, however, that we can display data at the zip code or census tract level, but do not have information on neighborhood boundaries. Providing any data at a more granular neighborhood level would also present similar concerns as discussed above regarding feeder-level data.

The City of Minneapolis also suggested reporting data on the number of community critical services that lost grid power by type and location, along with the number of times that each of these services lost power. We are willing to work with the City and other interested parties to address reliability information and concerns for critical services customers. Additional discussions and development are needed, for example,

to define and identify community critical services and to determine what data is available.

SRA's comments highlighted the importance of prompt and accurate communication regarding outages and other reliability issues. SRA views utility communications and customer experience as part of service quality and seeks additional dialogue and possible additional reporting on customer communications during outage and emergency conditions. The Company is willing to explore with SRA and other stakeholders ways to enhance communications with customers on their reliability issues. For example, for areas that experience low reliability and more frequent outages we could consider additional messaging, such as sending informational letters on what the Company has done or will do to address reliability concerns. However, we do not currently track the communication method, timeliness, or penetration level of customer contacts during outages or emergencies by zip code.

As already described above, the Company can report outage frequency and duration data by zip code or census track, but has concerns providing data for smaller areas or by feeder. We do not believe it is meaningful to attempt to compare the actual outage restoration time to the average restoration time, as proposed by SRA, since the restoration time is highly dependent on the type of issue that is being fixed, and this root cause cannot be analyzed or compared on maps or spreadsheets.

SRA also proposed separate reliability metrics for overhead and underground facilities. The Company recognizes that the age and type of the distribution facilities (overhead vs. underground construction) impact reliability; however, we cannot envision how a separate reliability metric for each type of line construction could be illustrated so that it provides value to the public, especially considering the resources needed to create such metrics and presentations.

We have already addressed several issues raised by ELPC/VS above, including providing data at the feeder-level, reporting involuntary disconnections, updating maps annually, and making data available in a csv. file.

ELPC/VS also requested that the Company report, by feeder, customer accounts participating in energy assistance and energy efficiency programs. Providing this information by feeder would raise significant customer privacy and confidentiality concerns. We also do not have the information readily available at the feeder level. However, we have the capability to report and map at the zip code level customer participation in energy assistance and energy efficiency programs

Additionally, ELPC/VS proposed that the Company provide information on the impact of grid modernization efforts on a feeder, comparing reliability measures before and after the installation of Advanced Metering Infrastructure (AMI) or Fault Location, Isolation, and Service Restoration (FLISR). We are willing to report this information at the time we have installed a substantial quantity of AMI and FLISR devices to allow locational analysis, but we again propose against displaying this information at a feeder-level in any maps.

The Company completes a robust analysis on our poor-performing feeders but has in the past provided only a high-level summary on select feeders. We are willing to explore how to report more detailed information on the poor-performing feeders in a format that does not compromise customer privacy or grid security; however, we do not find it appropriate to provide a scoring system that would benchmark all feeders to the system performance, as proposed by ELPC/VS. Although this work is completed annually today to identify our poor-performing feeders, this analysis is complex and varies as issues are resolved or raised. We are concerned that the scoring system would simplify a complex issue and be misunderstood.

ELPC/VS also requested that the reliability and service quality map display a comparison to previous period data. We believe this is unnecessary as the historic information becomes available when we annually provide the data used in the maps.

CONCLUSION

We appreciate the opportunity to provide this additional information and clarifications as a response to the Department's Comments and request that the Commission accept our 2019 Service Quality Report. The Company is looking forward to further dialogue regarding meaningful ways to comply and present information on equity in electric reliability and customer service. The maps we developed would provide an opportunity to gain actual experience and feedback from customers and other users. Based on the feedback, all stakeholders could assess how often the maps are used by customers and if any modifications are necessary.

Dated: September 2, 2020

Northern States Power Company

CERTIFICATE OF SERVICE

I, Paget Pengelly, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota; or

xx by electronic filing.

MPUC Docket No: E002/M-20-406

Dated this 2nd day of September 2020.

/s/

_____

Paget Pengelly
Regulatory Administrator

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