Direct Testimony and Schedules
Christopher C. Cardenas

Before the Minnesota Public Utilities Commission
State of Minnesota

In the Matter of the Application of Northern States Power Company
for Authority to Increase Rates for Electric Service in Minnesota

Docket No. E002/GR-19-564
Exhibit___(CCC-1)

Customer Care and Bad Debt Expense

November 1, 2019

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Schedules

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND OCCUPATION.

A. My name is Christopher C. Cardenas. I am Vice President of Customer Care for Xcel Energy Services Inc. (XES), which provides services to Northern States Power Company (NSPM or the Company).

Q. PLEASE SUMMARIZE YOUR QUALIFICATIONS AND EXPERIENCE.

A. I have more than 20 years of experience in the areas of customer service and finance for energy utilities, cable and telecommunication companies. I joined XES in January 2019, previously serving as Vice President of Customer Services for PPL Electric Utilities in Pennsylvania. In my current position, I am responsible for the overall business performance of the Customer Care organization. Prior to this, I held various customer service and financial leadership roles with Time Warner Cable, Comcast Cable, U.S. Cellular and Sprint Nextel. I have also held various positions in corporate strategy, customer service operations and business development. My resume is provided as Exhibit___(CCC-1), Schedule 1.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A. My testimony provides an overview of the Customer Care organization and its 2020-2022 Operation and Maintenance (O&M) expense levels. I share ways we measure customer satisfaction for work Customer Care performs. I also present and discuss the Company's commodity and non-commodity bad debt expense, and the actions we have taken to minimize and manage it to the benefit of customers. Finally, I discuss impacts that Advanced Grid Infrastructure and Security (AGIS), and specifically Advanced Metering

Infrastructure (AMI), will have on Customer Care costs, functions, and processes, as well as changes that are needed to facilitate the transition to AMI for customers.

Q. PLEASE SUMMARIZE YOUR TESTIMONY.

A. The Customer Care organization has achieved strong customer satisfaction results, controlled its O&M expenses, and outperformed other utilities in managing bad debt expense. The 2020 test year O&M expense I propose for the Customer Care organization is $33.2 million for the State of Minnesota Electric Jurisdiction. This level of O&M expense continues Customer Care's trend of relatively flat levels of O&M expense since 2016, while continuing to achieve strong results in the Company's service quality measures and high levels of satisfaction with the service we provide our customers.

The 2020 test year bad debt ratio we propose is 0.35 percent, which results in a 2020 test year commodity bad debt expense of $11.3 million, and approximately $80,000 for non-commodity bad debt expense for the State of Minnesota Electric Jurisdiction. In addition to bad debt performance comparing favorably to other utilities, this bad debt ratio is consistent with performance since 2016.

The AGIS initiative is a comprehensive plan that will advance the Company's electric distribution system, provide customers with more choices, and enhance the way the Company serves its customers. Implementation of advanced metering technology and the communications network will enable the availability of detailed and timely data, system automation, and communications enhancements that will impact and provide benefits for our

customers and the Customer Care organization. As I will describe below, the process changes enabled by advanced grid implementation will help reduce Customer Care O&M expenses in meter reading, and potentially other areas.

Q. HOW IS YOUR TESTIMONY ORGANIZED?

A. I present the remainder of my testimony in the following sections:

- *Customer Care Organization.* I discuss my organization in terms of the business functions it provides to the Company and its customers. I also discuss the improvements we have made to various aspects of our service and the research we have done to understand our customers and to measure their satisfaction with the service we provide. In addition, I summarize the Company's service quality results. In this section, I also present the overall Customer Care O&M budget and the budgets by business function.
- *Commodity Bad Debt Expense.* This is the bad debt expense associated with the provision of energy services. I discuss the test year expense and proposed bad debt ratios, as well as how we determine our bad debt ratios and manage our bad debt expense.
- *Non-Commodity Bad Debt Expense.* This is bad debt expense associated with all types of retail customer billing, other than the provision of energy services. I discuss the Company's test year levels of expense, the various components of non-commodity bad debt expense, and what the various business functions do to manage non-commodity bad debt expense.
- *The AGIS Initiative.* I discuss Customer Care's responsibilities with respect to implementation of the Company's proposed AGIS initiative, including meter reading and billing, as well as direct customer contacts

that will support and facilitate AGIS implementation. I also discuss the impacts and benefits of AGIS from the Customer Care perspective, the framework for customer opt-out provisions, and how advanced grid capabilities will enable new products and services for our customers. I also discuss potential impacts to Customer Care operational and customer service metrics, and how the Company plans to track and report progress metrics as AGIS is implemented.

II. CUSTOMER CARE ORGANIZATION

A. Overview

Q. PLEASE SUMMARIZE THIS SECTION OF YOUR TESTIMONY.

A. In this section, I discuss the structure of the Customer Care organization and describe the various functions involved in providing service to the Xcel Energy organization, including NSPM and the other Operating Companies and their customers. I also present the Company's test year O&M expense, and discuss how we have managed to keep O&M expenses relatively flat since 2012 while introducing new customer programs and options and maintaining high levels of customer satisfaction relative to the work Customer Care performs.

Q. PLEASE DISCUSS THE FUNCTIONS OF THE CUSTOMER CARE ORGANIZATION AND HOW THEY RELATE TO THE COMPANY'S OVERALL BUSINESS GOALS.

A. The Customer Care organization performs essential functions that help the Company effectively provide its customers energy products and services and high levels of customer service. We ensure energy use is measured and billed accurately, collect and process customer payments, and assist our customers

with questions, concerns or requests about their energy services. We understand customer needs and expectations are evolving in the energy marketplace. We strive to meet those changing needs through improved communication, consultation and information, and automated functionality intended to improve our customers' experience. Our organization is critical to the Company's vision of becoming more customer-focused, and we will be instrumental as we support our customers through advanced grid modernization and help them realize the many benefits it holds for them.

Q. PLEASE PROVIDE AN OVERVIEW OF THE CUSTOMER CARE ORGANIZATION AND HOW THE ORGANIZATION SUPPORTS THESE COMPANY EFFORTS.

A. The Customer Care organization provides service to approximately 1.5 million gas and electric customers, 2.1 million electric only customers, and 550,000 gas only customers served by Xcel Energy across its service territory in eight states. We support customers starting when they initiate their energy service, as we collect ongoing meter readings and issue bills, through posting their payments to their accounts. We are available to customers via phone, web, mobile, email, and various social media. We consider customer survey data and other feedback and use it to assess our performance and opportunities for improvement. Below is a brief description of the various business functions that comprise the Customer Care organization:

- *Billing Services.* Responsible for the production and delivery of billing statements, researching billing and payment inquiries and resolving customer billing and payment issues, billing quality assurance, and receiving and posting all customer payments.
- *Contact Center.* Responsible for interacting with our customers through our customer contact centers, mailed and electronic correspondence,

social media and online inquires to answer their questions, resolve their concerns, and fulfill their requests.

- *Credit and Collections.* Responsible for accounts receivable management, minimizing customer receivable write-offs, and operation of credit contact centers.
- *Customer Operations.* Responsible for staff training, quality assurance, process efficiencies, contact center operational management and reporting, resolving customer complaints, communications within the organization, customer policy, low-income programs, planning, and budget oversight.
- *Meter Reading, Field Collections and Revenue Assurance.* Responsible for reading customer meters, performing field disconnection and collection activities, and investigating energy theft and revenue loss situations.

Q. DO YOU USE ONLINE OR TECHNOLOGY TOOLS TO INTERACT WITH CUSTOMERS?

A. Yes. Our Interactive Voice Response (IVR) automated phone system is an important tool customers use to conduct quick and easy transactions without the need to speak with a customer service representative. We actively manage this tool, making enhancements to ensure customers experience highly satisfying and efficient transactions. Our customers use the IVR system extensively and are very satisfied with it, as shown in Table 2. In addition, we support our customers with inquiries and requests submitted through our web site, with a notable increase in the number of customer interactions requesting moving-related changes being submitted online over the last several years. We also receive emails from customers, as well as respond to comments or requests through social media. Customers also interact with the Company

through our web site, including MyAccount online account management, as well as through our mobile application.[1]

Q. WHAT PAYMENT METHOD OPTIONS DO CUSTOMERS HAVE TO PAY THEIR UTILITY BILLS?

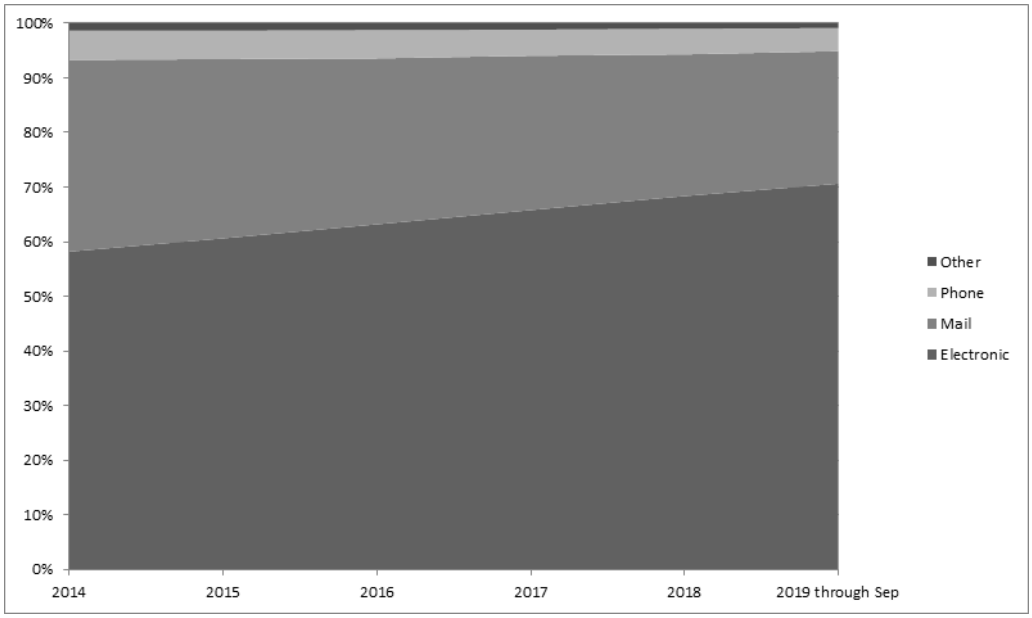
A. We currently offer several payment alternatives to our customers, which we group into four payment channels: Mail, Phone, Electronic, and Other. Customers can pay their bills by phone and either complete the payment using our IVR system, or by talking to a customer service representative. They may also use a credit or debit card to make a payment through our credit card vendor. Customers can also use the Company's online MyAccount portal to pay their bill electronically, use our mobile application, or they can pay their bill at designated pay stations.[2] Business customers have an additional option to pay their bills through Electronic Funds Transfer.

As shown in Figure 1 below, an increasing percentage of customers are submitting their payments through electronic payment options. In addition to being more convenient for a significant number of customers, this shift creates efficiencies for the Company as the use of any electronic channel helps reduce overall billing costs.

[1] Information on the mobile application can be found at: https://www.xcelenergy.com/mobile_app
[2] Information on designated pay stations can be found at: https://www.xcelenergy.com/billing_and_payment

Figure 1

Customer Payments by Channel[3]



Q. ARE THERE ANY NEW PAYMENT OPTIONS THE COMPANY WANTS TO OFFER THAT CAN BE ENABLED THROUGH ADVANCED GRID MODERNIZATION EFFORTS?

A. Yes. The Company would like to offer a pre-payment option in the future enabled by our proposed investments in advanced grid technology. In section V, I discuss how AGIS enables a pre-payment and the potential benefits of providing this option for our customers.

Q. ARE YOU SEEING ANY OTHER AREAS OF EVOLVING CUSTOMER EXPECTATIONS IN ADDITION TO BILLING AND PAYMENT?

A. Just as customers expect choices when it comes to billing and payment options, they also seek choices for how they interact with the Company. They

[3] The Electronic payment channel includes payments through My Account, CheckFree, auto payments, and electronic funds/wire transfers. The Other payment channel includes payments through pay stations, credit/debit cards through a contracted vendor, energy assistance payments, and payments from collection activities.

appreciate receiving notifications and status updates to keep them informed of matters impacting their service, such as during outages. They increasingly interact with us using digital channels, and look to their utility provider to use technology to help them improve their quality of life, save money, and maintain their safety.

As outlined in Company witness Mr. Michael Gersack's testimony, the needs and preferences of customers continue to evolve in the digital age. To better understand our customers' perspectives, we conducted focus groups and surveys about their preferences, considerations and thoughts around the benefits and value of advanced grid investment.

Customers are interested in safety and energy savings, as well as certain features of their electric service that would be enabled by the advanced grid. These include more detailed and timely information about their energy use, improved reliability and outage restoration, and the ability to remotely control their energy usage. Mr. Gersack discusses the Company's customer survey and research efforts and results in detail in his testimony. The Company believes its advanced grid investment will help meet our customers' growing expectations. Later in my testimony, I discuss Customer Care-related impacts primarily related to AMI technology.

B. Test Year O&M Budget – Overall Customer Care

Q. HOW DOES THE CUSTOMER CARE ORGANIZATION DEVELOP ITS PLANS AND BUDGETS?

A. We assess the needs of the Customer Care organization and the various Operating Companies we support, and plan and budget at the business

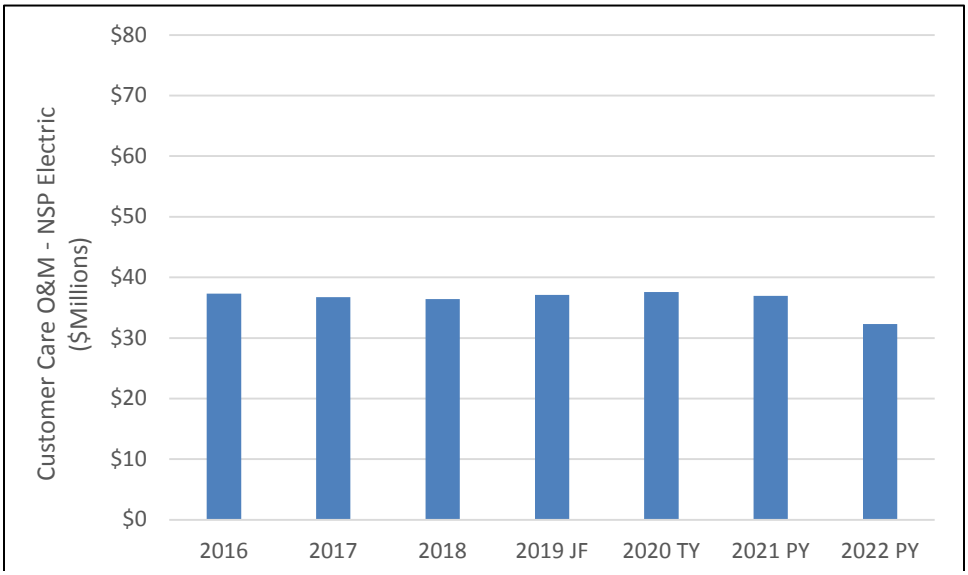
function level. This is necessary given the variety of services provided by the different business functions that make up the Customer Care organization. Unless otherwise noted, this discussion relates to Customer Care O&M at the NSPM Electric level.[4]

Q. PLEASE PROVIDE AN OVERVIEW OF THE CUSTOMER CARE O&M BUDGET.

A. Figure 2 below summarizes overall Customer Care O&M expense since 2016. Please see Exhibit___(CCC-1), Schedule 2 for additional details regarding Customer Care O&M expense levels.

Figure 2

Customer Care O&M Trend – NSPM Electric



Overall, the Customer Care 2020 test year O&M budget is relatively flat compared to the O&M expense levels for the past four years. The total 2020

[4] Company witness Ms. Melissa L. Schmidt explains how the Company allocates and assigns Xcel Energy Service Company costs to NSPM. Company witness Mr. Benjamin C. Halama explains the utility and jurisdictional allocation process that assigns NSPM operating company costs to the State of Minnesota Electric Jurisdiction.

Customer Care test year O&M expense of $37.6 million is within 1 percent of the spending level in 2016, with slight variation in between those years.

Q. HOW HAS CUSTOMER CARE BEEN ABLE TO KEEP ITS O&M BUDGET RELATIVELY FLAT OVER SUCH A LONG PERIOD OF TIME?

A. We have largely been able to achieve favorable results by automating work processes and focusing on operational performance improvements and efficiencies. Increasing customer use of electronic billing and payment methods and digital interaction channels also play a role in managing costs. Going forward, cost renegotiations with our current meter reading vendor, as well as AMI deployment, would reduce meter reading costs substantially.

Q. HAVE YOU COMPARED THE COMPANY'S HISTORICAL O&M EXPENSE TO OTHER COMPANIES FOR CUSTOMER CARE-RELATED EXPENSES?

A. Yes. The Federal Energy Regulatory Commission (FERC) account electric cost data from the S&P Global Intelligence Platform compares Customer Care-related expenses for more than 100 regulated energy companies representing gas and electric utilities. While combination gas and electric utilities, like NSPM, are in this universe, we have compared only electric costs. The total population, on average, consisted of 105 companies annually from 2008 through 2018.

Q. HOW DOES NSPM'S HISTORICAL O&M EXPENSE COMPARE TO OTHER COMPANIES FOR CUSTOMER CARE-RELATED EXPENSES?

A. Overall, NSPM continues to compare favorably when looking at mean performance in total costs captured in FERC accounts 901 through 905, which include the majority of costs managed by Customer Care,

Exhibit___(CCC-1), Schedule 8. Table 1 below shows total Customer Accounts Expense, including bad debt expense, per retail customer for FERC accounts 901 through 905. NSPM Total Company shows declining and lower cost per retail customer than the Competitor Group (mean) during the last five years of reported data.

Table 1
Customer Accounts Expense per Retail Customer
Comparison (901-905)

	2014	2015	2016	2017	2018
NSPM Total Company	$40.6	$38.4	$38.5	$37.8	$37.7
Competitor Group (mean)	$51.4	$51.8	$50.6	$48.2	$49.1

Source: S&P Global Intelligence Platform

Q. GIVEN THE RELATIVELY FLAT O&M OVER THE PAST SEVERAL YEARS, HAVE YOU SEEN A NEGATIVE IMPACT TO CUSTOMERS?

A. No. The Company's Voice of the Customer Transaction Survey (VOC) is the most direct measure of customer satisfaction with the services provided by the Customer Care organization. As seen in Table 2 below, VOC transaction results remain high.

Beginning with data reported for 2017, the Company implemented a new customer experience platform through vendor MaritzCX to assess satisfaction for various channels, including agent and IVR experiences. The Company's partnership with the new vendor eliminates a manual agent call transfer process, objectively manages the survey sampling process, and works to ensure a statistically representative sample. Results are loaded daily to

interactive reporting dashboards for easier access. These enhancements facilitate more frequent results and more in-depth understanding.

The former vendor transaction study also used a different scale than the new vendor for agent results. The former vendor used a 0-10 scale for the agent survey results, while the new vendor survey uses a 1-10 scale, both with a top three box range (8-10). The IVR survey scale remains a 1-5 scale with a top two box range (4-5); however, the IVR survey method changed to an automated phone survey instead of a live phone survey, to match the method of customer interaction. The agent survey remains a live phone survey. Finally, IVR and agent survey results are now reported separately, instead of being combined into one score based on transaction channel volume. Because of these changes, data reported starting with 2017 has been, and will continue to be, somewhat different than data reported for prior years, as reflected in Table 2 below. We believe that this new survey and methodology will allow the Company to track customer satisfaction even more accurately than in the past.

Table 2

Voice of the Customer Transaction Survey – Minnesota Electric

(Percentage of Customers Providing a Positive Rating)[5]

	2014	**2015**	**2016**	**2017**	**2018**
Overall Satisfaction with Transaction (IVR and Agent 2014-2016; Agent Only 2017 – 2018)	83%	86%	83%	84%	84%
IVR Overall Satisfaction with Transaction	85%	88%	83%	82%	81%

[5] Positive rating equates to a score of 8, 9 or 10 on a 0-10 scale (2014 – 2016) or 8, 9 or 10 on a 1-10 scale (2017 – 2018) for Agent/IVR or Agent Only satisfaction, or a score of 4 or 5 on a 1-5 scale for IVR satisfaction.

I provide more information regarding customer satisfaction in Exhibit___(CCC-1), Schedule 3. While customer satisfaction remains high relative to the work Customer Care performs, there is room for improvement in other areas, such as the Company's digital platform for customer information, which is discussed further in the Direct Testimony of Company witness Mr. David C. Harkness.

Q. ARE THERE OTHER INDICATORS THAT SHOW YOU ARE MEETING CUSTOMER EXPECTATIONS?

A. Yes. In addition to achieving high customer satisfaction levels over this period, the Company has consistently met the service quality performance measures contained in its Minnesota Service Quality Plan tariff. These include Customer Care measures, such as the time to answer customer calls, customer complaints and billing and meter reading performance metrics.

Q. WHAT ARE CUSTOMER CARE'S O&M EXPENSE LEVELS FOR THE 2020 THROUGH 2022 PLAN YEARS?

A. The Company requests a NSPM Electric O&M expense level for Customer Care of $37.6 million for the 2020 test year, $37.0 million for 2021 and $32.3 million for 2022. I note that these amounts incorporate anticipated O&M reductions associated with the proposed AMI deployment plan. Deployment delays or disapproval of AMI deployment may impact these Customer Care O&M expense levels. I discuss the key drivers of Customer Care's O&M expenses from 2020 through 2022 below.

Q. PLEASE SUMMARIZE KEY FACTORS IMPACTING CUSTOMER CARE EXPENSE LEVELS FROM 2020 THROUGH 2022.

A. Customer Care expects an overall O&M reduction from 2020 through 2022 primarily associated with anticipated reductions in meter reading expenses. Part of this reduction results from successful contract negotiations with the Company's meter reading services vendor, Landis+Gyr (Cellnet). The negotiations eliminated a contract cost escalation factor associated with economic indicators starting in January 2019. It also enables reductions in meter reading services costs as AMI deployment occurs starting in 2022, partially offset by the elimination of credits for meters Cellnet cannot read according to its contractual schedule. These negotiated contract changes extend for the life of the remaining contract. Additional O&M reductions are associated with the anticipated AMI deployment timeline. If the Commission does not approve AMI deployment or the timeline changes, expense reductions associated with the deployment will be eliminated or shift, and meter reading costs could increase. I discuss the year-to-year O&M impacts and expense drivers in more detail below.

Q. PLEASE EXPLAIN THE PURPOSE AND IMPACT OF THE KEY COST DRIVERS OF CUSTOMER CARE'S 2020 O&M EXPENSES FROM 2019 LEVELS.

A. From 2019 to 2020, we anticipate an increase of approximately $475,000. Labor costs increase by approximately $212,000, with most business areas incorporating a three-percent annual performance-based wage increase. In Outside Services, we anticipate an increase of approximately $300,000 associated with meter growth additions, collection agency fees, and bill image and processing costs, partially offset by approximately $90,000 in AMI-related savings.

Q. PLEASE EXPLAIN THE PURPOSE AND IMPACT OF THE KEY COST DRIVERS ON CUSTOMER CARE'S 2021 O&M EXPENSES FROM 2020 LEVELS.

A. From 2020 to 2021, we anticipate a decrease of approximately $640,000 in Customer Care O&M expenses. This includes AMI deployment savings of about $691,000, partially offset by annual wage increases of about $261,000 and a slight increase in outside services of $29,000. We anticipate reductions for postage costs of $239,000 associated with increases in customer adoption of electronic billing and payment methods.

Q. PLEASE EXPLAIN THE PURPOSE AND IMPACT OF THE KEY COST DRIVERS OF CUSTOMER CARE'S 2022 O&M EXPENSES FROM 2021 LEVELS.

A. From 2021 to 2022, we anticipate the Customer Care O&M budget will decrease by about $4.6 million. This is primarily driven by increased anticipated cost reductions in Meter Reading; including a $2.3 million increased reduction based on the deployment of AMI meters, and a $3.3 million reduction expected due to Cellnet contract renegotiation. These reductions are partially offset by elimination of Cellnet credits totaling $1.1 million in 2022. Reductions also are expected to continue in postage of approximately $151,000, offset by labor increases of $171,000.

C. O&M Budgets by Business Function

Q. PLEASE SUMMARIZE CUSTOMER CARE O&M EXPENSE BY BUSINESS FUNCTION.

A. Table 3 below provides an overall view of Customer Care O&M expense levels since 2016. Please see Exhibit___(CCC-1), Schedule 2 for additional details regarding Customer Care O&M expense. As I discussed above, overall Customer Care O&M levels have remained relatively flat over a significant period of time. I discuss below some of the variations that have occurred in

the various functional areas of Customer Care for the 2016 to 2022 period. I discuss the drivers of Customer Care's 2020 through 2022 plan year expense levels in Section II.B above.

Table 3
Customer Care O&M by Business Area –
NSPM Electric ($ millions)

	Historic Actuals			July 2019 Forecast	2020 Test Year	Plan Years		Percent Change 2016 - 2022
	2016	2017	2018			2021	2022	
Billing Services	$8.2	$7.7	$7.4	$7.8	$8.2	$7.96	$7.7	-6.2%
Contact Center	$4.6	$4.3	$4.0	$4.0	$4.0	$3.98	$4.0	-13.4%
Credit and Collections	$2.4	$2.4	$2.3	$2.1	$2.2	$2.27	$2.3	-3.7%
Vice President & Customer Operations	$1.7	$1.7	$1.6	$1.7	$1.7	$1.78	$1.8	5.7%
Meter Reading and Field Collections	$20.3	$20.7	$21.2	$21.5	$21.39	$21.0	$16.5	-19.0%
Total Customer Care O&M	*$37.3*	*$36.8*	*$36.4*	*$37.1*	*$37.59*	*$37.0*	*$32.3*	*-13.3%*

Due to rounding, there may be differences between the sum of the individual category amounts and total amounts.

1. Billing Services

Q. PLEASE DESCRIBE THE CHANGE IN BILLING SERVICES O&M.

A. From 2016 through 2022, the Billing Services O&M budget decreases by 6.2 percent. We are able to achieve this reduction through increased customer adoption of electronic billing and payment channels helping to offset postal

rate increases; billing work automation; and other process improvements and efficiencies.

2. Customer Contact Center

Q. PLEASE DESCRIBE THE CHANGE IN CUSTOMER CONTACT CENTER O&M.

A. The Customer Contact Center O&M budget decreases by 13.4 percent from 2016 to 2022. This is primarily due to increased customer use of automated interaction channels, including the IVR system, which has helped to lower labor costs through reduced staffing needs. While Contact Center entry-level wage rates have increased, given more competitive labor markets, we have seen agent-handled call volume decline over time. We are focusing on resolving customers' needs efficiently on the first call. We recognize that calls coming into our contact centers are more complex, as simpler transactions are increasingly completed through automated means.

Tables 4 and 5 below illustrate Minnesota customers' increased use of the IVR system, as well as total Minnesota call volume trends. Call volume has generally been declining over time, as customers continue to increase their use of digital interaction channels, including the IVR. There is always some variability from year to year, with weather primarily influencing the volume of both power outage and billing-related calls.

Table 4

Minnesota Customer IVR Utilization Rate – State of Minnesota

	2014	2015	2016	2017	2018	2019 YTD (through September)
Percent of Calls Handled in the IVR	55%	58%	58%	58%	61%	60%

Table 5

Customer Call Volume – State of Minnesota

	2014	2015	2016	2017	2018	2019 YTD (through September)
Total Offered Calls (Agent and IVR)	3,974,475	3,940,849	3,970,416	3,439,419	3,372,034	2,563,781
Average Monthly Call Volume	331,206	328,404	330,868	286,618	281,003	284,865

3. Credit and Collections

Q. PLEASE DISCUSS CREDIT AND COLLECTIONS O&M.

A. The Credit and Collections O&M budget decreases by 3.7 percent from 2016 to 2022. This decline is primarily due to increased use of more cost-effective and efficient customer outreach methods, such as email and calls, for proactive outbound credit campaigns to the Company's past-due customers. These campaigns integrate with our IVR system to facilitate more automated customer payments. IVR functionality has also been expanded to enable disconnected customers to set up reconnection of their service through the IVR and to establish payment arrangements. Analytics have also helped to further target cost-effective customer outreach efforts.

4. Vice President and Customer Operations

Q. PLEASE DISCUSS THE VICE PRESIDENT AND CUSTOMER OPERATIONS O&M.

A. The Vice President and Customer Operations O&M budget is projected to increase by 5.7 percent from 2016 to 2022, which is a $98,000 increase over five years. The main cost drivers are performance-based wage increases ($59,000) and increased automated customer notifications ($45,000), which are used to keep customers informed of outage status and provide billing and payment reminders.

5. Meter Reading and Field Collections

Q. WHAT IS THE COMPANY'S CURRENT METER READING PROCESS?

A. The Company currently uses Automated Meter Reading (AMR) technology, which it implemented beginning in the mid-1990s. Meter readings are collected and provided to the Company via a proprietary network by Cellnet, our current meter reading services vendor. Informational meter readings are generally provided daily and billing quality readings are provided once per billing cycle, with the billing quality readings used to generate the monthly customer bill. In addition to providing the meter readings, Cellnet owns and maintains the communication network and software used to transmit the readings. Cellnet also owns and maintains electric meter communication modules, which refers to the radio interface that is installed as part of the electric meter. The Company's payments to Cellnet for these services are reflected as O&M expense in our budgets.

Q. PLEASE DISCUSS THE METER READING AND FIELD COLLECTIONS O&M.

A. The Meter Reading and Field Collections O&M budget is projected to decline by 19 percent from 2016 to 2022. Through recent negotiations with Cellnet,

the Company successfully removed an annual cost escalation factor tied to economic indicators. This is reflected in relatively flat O&M budgets starting in 2019 and 2020. The elimination of this cost escalation factor will continue through the remaining life of the contract. This will be a significant benefit in managing meter reading O&M cost during the next several years. Contract negotiations also resulted in lower meter reading services fees starting in 2022 that continue for the life of the remaining contract. Additional budget reductions in this business area in 2021 and 2022 are dependent upon deployment of AMI meters. In Section V, I discuss the expiration of the Cellnet contract; the Company's planned deployment of AMI meters, and the resulting impacts to meter reading costs.

III. COMMODITY BAD DEBT EXPENSE

A. Introduction

Q. WHAT IS COMMODITY BAD DEBT EXPENSE?

A. Commodity bad debt expense is billed commodity revenue for electric and natural gas service that is considered uncollectible from customers. Commodity revenue refers to the revenue billed to the Company's customers for the cost of utility service, including fuel charges and all regulated charges to customers, such as riders. This definition represents virtually all of the Company's billed retail customer revenue. It does not include comparatively minor ancillary charges such as damage claims, which are considered "non-commodity" revenue, discussed in Section IV of my testimony.

Q. PLEASE SUMMARIZE THE COMPANY'S PROPOSED TEST YEAR COMMODITY BAD DEBT EXPENSE.

A. For the 2020 test year, we propose a 0.35 percent of revenue ratio. On a State of Minnesota Electric Jurisdiction level, this represents commodity bad debt expense of $11.3 million. I discuss the bad debt expense budget and forecast process in Part B, the methodology we use to determine our bad debt ratios and proposed bad debt expense levels and trending in Part C, and the allocation methodology for commodity bad debt expense between electric and gas operations in Part D.

Q. HOW DO THE 2020-2022 PROPOSED BAD DEBT EXPENSE LEVELS COMPARE TO PREVIOUS LEVELS?

A. The 2020 through 2022 bad debt expense levels continue to be relatively stable following a significant decline from 2008, when the Company's bad debt expense ratio was at 0.65 percent.

B. Bad Debt Expense Budget and Forecast Process

Q. HOW DOES THE COMPANY BUDGET AND FORECAST COMMODITY BAD DEBT EXPENSE?

A. In general, we recognize commodity bad debt expense through a combination of: (1) estimating an amount of accounts receivable reserve (or provision) associated with outstanding receivables that will be unrecoverable; and, (2) writing-off uncollectible accounts not previously reflected in this reserve. From the combination of these amounts, we derive a weighted average ratio of bad debt to overall billed commodity revenue. To determine forecasted bad debt expense, as is necessary for budgeting purposes and for a rate case,

the Company applies this bad debt ratio to forecasted commodity revenues and allocates it between its electric and natural gas operations.

Q. WHY IS IT REASONABLE TO ESTIMATE BAD DEBT EXPENSE BASED UPON A RATIO OF BAD DEBT EXPENSE TO COMMODITY REVENUE?

A. Using a ratio of billed commodity revenue is reasonable because there is a direct relationship between billed commodity revenue and bad debt expense. In particular, as billed commodity revenue increases and decreases, bad debt proportionately increases and decreases. This practice is commonly used by industry groups, as verified by the Edison Electric Institute (EEI), and this trend is also supported by historical data.

Q. WHAT FACTORS IMPACT COMMODITY BAD DEBT EXPENSE?

A. All else being equal, commodity bad debt expense varies directly with billed commodity revenues. Other factors affecting bad debt expense include changes in credit policy, external considerations such as the economy, low income energy assistance programs, levels of business bankruptcies, as well as the efficiency of the Company's supporting processes and operations.

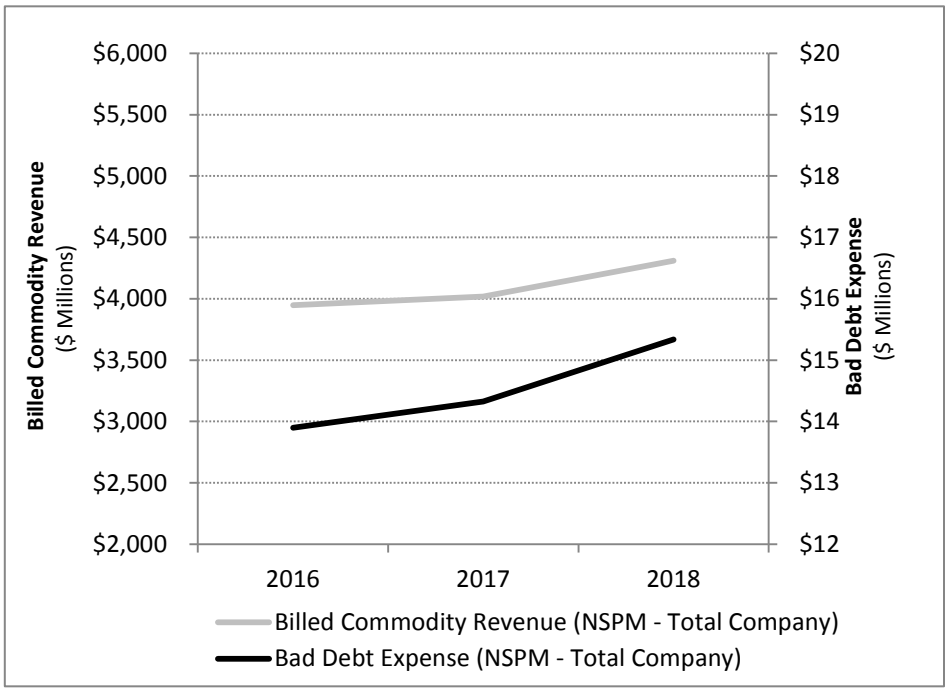
Q. CAN YOU ILLUSTRATE THE CORRELATION BETWEEN BILLED COMMODITY REVENUES AND THE RESERVE FOR BAD DEBT?

A. Yes. Figure 3 below illustrates the historical correlation between billed commodity revenues and the change in bad debt reserve.

Figure 3

Billed Commodity Revenues and

Bad Debt Expense NSPM Total Company



Q. DOES THE FUEL FORECAST IMPACT COMMODITY BAD DEBT EXPENSE?

A. Yes. The revenue forecast is a primary input to the bad debt expense forecast, and the fuel cost forecast is used in developing the revenue forecast. Therefore, the relationship of fuel cost increases and decreases are directly correlated to changes in revenues, and ultimately bad debt expense budgets and forecasts. Once the revenue forecast is complete, the bad debt expense model uses that forecast as an input so that the bad debt expense forecast directly reflects forecasted changes in revenue.

Q. HOW DO YOU CALCULATE THE ACCOUNTS RECEIVABLE RESERVE PORTION OF BAD DEBT EXPENSE?

A. We calculate the reserve by applying provisioning factors to various aging categories of outstanding arrears for both active and inactive customers. A provisioning factor is the percentage of the accounts receivable estimated to eventually prove uncollectible. In general, as arrears age, and as they move with our customers from active to inactive status, we apply a higher provisioning factor to reflect the declining likelihood that we will collect the full outstanding balance. These reserve amounts are updated monthly and are combined with net write-offs to become the total bad debt expense for the period.

Q. HOW DOES THE COMPANY KNOW THAT ITS PROVISIONING FACTORS ARE REASONABLE?

A. The provisioning factors we apply to outstanding arrears are developed from annual reserve studies in which we analyze historical customer payment behavior data and consider contributing factors such as the sales forecast and underlying fuel forecast, any changes in credit policy, and external considerations such as the economy. Our most recent reserve study was completed in June 2019. Due to a new credit loss accounting standard that will become effective for the Company in 2020, we are reviewing our reserve study model to determine what changes may be needed for compliance. We plan to modify our provision model to start reserving for unbilled revenue, which would be reserved at the lowest provision rate used for billed revenue that is not past due.

Q. IS THE IMPACT OF LOW-INCOME PROGRAMS REFLECTED IN THE COMPANY'S 2021 THROUGH 2022 PLAN YEAR BAD DEBT EXPENSE?

A. Generally, yes. Low-income programs (*i.e.* Low Income Home Energy Assistance Program (LIHEAP), our Electric Low Income Discount Rider, and/or our Gas Affordability Program) help low-income customers pay amounts due for energy services, thereby reducing outstanding receivables. To the extent the remaining balance of these customer accounts are later written off per current Company policy (Exhibit___(CCC-1), Schedule 4, is the Company's Write-Off Policy), low-income payment programs help reduce the amount of the write-off, and thus bad debt expense. We work closely with our customers and agencies to try to maximize customers' participation in energy assistance funding and programs. While we believe state funding appears relatively consistent for the plan years, federal funding is reviewed annually and subject to change. Table 6, below, shows historical customer participation in LIHEAP and other energy assistance programs from 2016 through 2018.

Table 6
LIHEAP and Energy Assistance Program
Historical Participation
($ millions)

Year	NSPM LIHEAP Households	NSPM Program Participants	NSPM Discount and PowerON Disbursements	NSPM Medical Program Disbursements	Total Energy Assistance (LIHEAP, County Assistance, Fuel Funds, other)	Total*
2016	58,810	52,944	$11.4	N/A	$29.0	$40.3
2017	55,377	52,834	$11.5	N/A	$25.3	$36.9
2018	55,223	53,843	$10.3	$1.3	$30.1	$40.5

Note: The LIHEAP households, Company program participation and Total Energy Assistance columns are following the program year of October 1 to September 30. Discount and PowerON Disbursements are January to December. The first year of disbursements for the MN Xcel Energy Medical Program was 2018.

Q. WHAT DOES THE COMPANY DO TO MANAGE BAD DEBT EXPENSE, PARTICULARLY WHEN REVENUES ARE INCREASING?

A. We continue to use a combination of approaches to manage bad debt expense, including:

- Proactively contacting delinquent residential customers through targeted contacts, including emails and outbound calls;
- Close monitoring of commercial accounts and industry trends, and work to keep these customers as current as possible to minimize potential bankruptcy impacts;
- Focused management of collection agency practices to help improve collections from customers whose debt had previously been written off;
- Developing advanced analytical methods to ensure the most efficient and effective credit activities are utilized; and
- Strong support of energy assistance programs that help the Company's most at-risk customers.

We continually monitor our level of bad debt expense and the factors that influence it, and take action to respond through process or other changes. I discuss specific activities that Customer Care has implemented in an effort to manage bad debt expense in conjunction with my discussion of our bad debt expense trend in Part C below.

C. Test Year Bad Debt Calculation

1. Bad Debt Ratios and Trend

Q. HOW WAS THE 2020 BAD DEBT RATIO CALCULATED?

A. The 2020 bad debt ratio was calculated by averaging bad debt expense as a percent of revenue for the 24-month period ended June 30, 2018.

Exhibit___(CCC-1), Schedule 5 includes a detailed calculation of the bad debt ratio.

Q. HOW DID YOU DERIVE THE 2021 THROUGH 2022 BAD DEBT RATIOS?

A. The bad debt ratios for 2021 through 2022 were calculated using the same methodology as 2020.

Q. IS THE COMMODITY BAD DEBT RATIO OF 0.35 THE COMPANY PROPOSES FOR THE 2020 TEST YEAR AND 2021 THROUGH 2022 REASONABLE?

A. Yes. As shown in Table 7 below, our bad debt ratio has remained relatively stable since 2016. Also, the 0.35 ratio we propose for 2020 - 2022 closely aligns with our 2016 - 2018 actual bad debt expense ratios. Our commodity bad debt ratio forecast for 2019 is lower due to one-time refunds posted to customer accounts in 2019 associated with the Tax Cut and Jobs Act (TCJA). Minnesota electric customers received TCJA refunds totaling $144 million in May 2019. These one-time refunds will not occur in future years. Commodity bad debt ratios for NSPM are forecasted based on the total company, including electric and natural gas commodities.

Table 7

Commodity Bad Debt Ratio – NSPM Total Company

Actuals			July Forecast	Test Year	Plan Years	
2016	**2017**	**2018**	**2019**	**2020**	**2021**	**2022**
0.35%	0.36%	0.36%	0.32%	0.35%	0.35%	0.35%

Note: The 2019 forecast is lower because it includes the impact of one-time TCJA customer refunds.

2. Bad Debt Expense and Trend

Q. WHAT IS THE PROPOSED 2020 COMMODITY BAD DEBT EXPENSE?

A. We propose a commodity bad debt expense of $14.7 million for NSPM Total Company, which translates to a 2020 test year commodity bad debt expense of $11.3 million for the State of Minnesota Electric Jurisdiction. We provide detailed calculations supporting the 2020 test year commodity bad debt expense as Exhibit___(CCC-1), Schedule 6.

Q. WHAT IS THE PROPOSED 2021 THROUGH 2022 COMMODITY BAD DEBT EXPENSE?

A. We propose a 2021 commodity bad debt expense of $15.1 million for NSPM Total Company, which translates to a 2021 plan year commodity bad debt expense of $11.6 million for the State of Minnesota Electric Jurisdiction. For 2022, we propose NSPM Total Company commodity bad debt expense of $15.4 million, which translates to a 2022 plan year commodity bad debt expense of $11.9 million for the State of Minnesota Electric Jurisdiction. We provide detailed calculations supporting the 2021 through 2022 plan years commodity bad debt expense as Schedule 6.

Q. HOW WAS THE PER-YEAR BAD DEBT EXPENSE CALCULATED?

A. We calculate the commodity bad debt expense level by applying the bad debt ratio for each year to each year's total Company forecasted commodity revenues. We then allocate the proposed bad debt expense to the State of Minnesota Electric Jurisdiction through an allocation process that I discuss in Section III.E of my testimony.

Q. HOW DO 2020 THROUGH 2022 BAD DEBT EXPENSE LEVELS COMPARE TO HISTORICAL BAD DEBT EXPENSE LEVELS?

A. Table 8 below presents the trend of the Company's commodity bad debt expense since 2016. Commodity bad debt expense is expected to increase slightly from 2020 through 2022 due to increasing revenue. Bad debt as a percent of revenue is expected to stay flat at 0.35 percent from 2020 through 2022. This is consistent with 2016 and slightly lower than 2017 and 2018. As stated earlier in my testimony, bad debt as a percent of revenue is forecast at 0.32 percent for 2019, which is lower than historical trending and future forecasts due to the one-time impact of TCJA customer refunds this year.

Table 8
Commodity Bad Debt Expense Trend –
State of Minnesota Electric
($ millions)

Actuals			July Forecast	Test Year	Plan Years	
2016	**2017**	**2018**	**2019**	**2020**	**2021**	**2022**
$10.46	$10.69	$11.50	$10.24	$11.26	$11.57	$11.85

Q. PLEASE DISCUSS THE TREND IN THE COMPANY'S COMMODITY BAD DEBT EXPENSE.

A. Table 8 above shows the Company's bad debt expense has generally increased since 2016. The primary reason is the increase of approximately $519 million in NSPM Total Company billed commodity revenue from 2016 (approximately $4.0 billion) to 2022 (approximately $4.5 billion) as reflected in Schedule 6.

Q. HOW DOES THE COMPANY'S TOTAL BAD DEBT EXPENSE COMPARE TO OTHER UTILITIES?

A. The Company's bad debt expense compares favorably to other utilities as reflected in FERC account 904 expenses.[6] For the 2014-2018 period, which is the most current information available, the combination of the Company's total commodity and non-commodity bad debt expense has consistently been below the mean expense level of other utilities. We provide a summary of this expense level comparison in Table 9 below.

Table 9

Customer Records and Uncollectible Expense per Retail Customer Comparison

	2014	2015	2016	2017	2018
NSPM Total Company	$9.97	$8.33	$8.61	$8.87	$9.28
Competitor Group (mean)	$13.92	$13.68	$13.52	$10.53	$12.38

Source: S&P Global Intelligence Platform

D. Allocation Methodology

Q. HOW DOES THE COMPANY ALLOCATE COMMODITY BAD DEBT EXPENSE BETWEEN ELECTRIC AND NATURAL GAS OPERATIONS?

A. We allocate bad debt expense to our natural gas and electric operations consistent with the process by which debt is written off. Total bad debt expense is assigned at a total Operating Company level, because customer payments and write-offs are recorded to the customer's overall account – not separately for electric and gas service. Therefore, because we have combined

[6] FERC account 904 is "charged with amounts sufficient to provide for losses from uncollectible utility revenues."

electric and gas customers who pay for utility service on an integrated basis, the bad debt expense is also integrated at a customer account level.

To differentiate bad debt expense between gas and electric service, we use an allocation to reasonably approximate the proportions of electric and gas utilities' bad debt expense. After applying the bad debt ratio to total NSPM commodity revenue, the resulting amount is allocated to the Minnesota jurisdiction and between the electric and gas utilities by using a rolling four-year total of revenues to utility and jurisdiction. The allocator in the 2020 test year is developed based on the four previous calendar years' actual operating revenues from the corporate income statement, which we update every April.

Using this methodology, the amount of bad debt expense allocated to the State of Minnesota Electric Jurisdiction utility operations for 2020 in this case is 76.8 percent of the total bad debt expense for the Company. Essentially, this reflects the fact that Minnesota electric commodity revenues equaled 76.8 percent of NSPM commodity revenues during the January 2015 through December 2018 period.

Q. DID YOU USE THE SAME ALLOCATION PERCENTAGE FOR THE 2021 THROUGH 2022 PLAN YEARS?

A. Yes. The 2021 through 2022 plan years use the same allocation percentage as the 2020 test year.

Q. HAS THE COMPANY USED THIS ALLOCATION METHODOLOGY IN ITS PREVIOUS RATE CASES?

A. Yes. This is the same methodology used in all recent rate cases, including the 2016 rate case (Docket No. E002/GR-15-826) and the Company's most recent natural gas rate case (Docket No. G002/GR-09-1153).

IV. NON-COMMODITY BAD DEBT EXPENSE

Q. WHAT IS NON-COMMODITY BAD DEBT EXPENSE?

A. Non-commodity bad debt expense is billed revenue that is considered uncollectible for everything other than electric and natural gas service. The non-commodity bad debt budget categories align with functional business areas and include the following:

- *Customer Care*: Miscellaneous charges such as returned check and connection-related fees;
- *Distribution Operations*: Contributions In Aid Of Construction; charges for requests made by customers for non-standard equipment or set-up; claims against third parties that damage the Company's electric and gas facilities.

Q. WHAT IS THE 2020 TEST YEAR AMOUNT FOR NON-COMMODITY BAD DEBT?

A. The 2020 test year non-commodity bad debt expense for the State of Minnesota Electric Jurisdiction is $230,000. Detailed calculations supporting the test year non-commodity bad debt expense are provided in Exhibit___(CCC-1), Schedule 7.

Q. WHAT ARE THE 2021 THROUGH 2022 PLAN YEAR AMOUNTS FOR NON-COMMODITY BAD DEBT EXPENSE?

A. The 2021 through 2022 plan year non-commodity bad debt for the State of Minnesota Electric Jurisdiction is $230,000 each year. I provide the details as Schedule 7 to my testimony.

Q. HOW DO THESE AMOUNTS COMPARE TO PAST YEARS?

A. Table 10 below provides actual non-commodity bad debt expense amounts for the 2016-2018 period, the 2019 forecast, the 2020 test year, and the 2021 through 2022 plan year amounts.

Table 10
Non-Commodity Bad Debt Expense Trend
State of Minnesota Electric Jurisdiction
($ millions)

Actuals			July Forecast	Test Year Proposed	Plan Years Proposed	
2016	**2017**	**2018**	**2019**	**2020**	**2021**	**2022**
$0.69	$0.76	$0.51	$0.27	$0.23	$0.23	$0.23

Q. WHAT ARE THE AMOUNTS FOR THE INDIVIDUAL BUSINESS AREAS?

A. I provide the details as Schedule 7 to my testimony, and summarize the amounts in Table 11 below:

Table 11

Non-Commodity Bad Debt Expense by Business Area

State of Minnesota Electric Jurisdiction

($ millions)

	Actual Expense			July Forecast	Test Year	Plan Years	
	2016	**2017**	**2018**	**2019**	**2020**	**2021**	**2022**
Customer Care	$0.09	$0.08	$0.08	$0.07	$0.08	$0.08	$0.08
Distribution Operations	$0.60	$0.68	$0.44	$0.19	$0.15	$0.15	$0.15
Total	*$0.69*	*$0.76*	*$0.51*	*$0.27*	*$0.23*	*$0.23*	*$0.23*

Q. HOW DID THE COMPANY DEVELOP THE 2020 THROUGH 2022 NON-COMMODITY BAD DEBT EXPENSE LEVELS?

A. Each of the functions identified above assesses its current reserve in light of expected test year activities, such as expected billing amounts and Company credit policies, and then budgets accordingly.

V. THE ADVANCED GRID INFRASTRUCTURE AND SECURITY INITIATIVE

Q. WHAT INFORMATION DO YOU PROVIDE IN THIS SECTION OF YOUR TESTIMONY?

A. In this section, I discuss Customer Care's responsibilities with respect to implementation of the Company's proposed Advanced Grid Infrastructure and Security (AGIS) initiative. Specifically, Customer Care is responsible for meter reading and billing, as well as direct customer contacts that will support and facilitate AGIS implementation. I discuss the impacts and benefits of

AGIS from the Customer Care perspective. I provide details on how the Customer Care team will manage customer questions and concerns as the AGIS initiative is being deployed, the framework of a customer opt-out option, and how advanced grid capabilities will enable new products and services for our customers. I also discuss impacts to Customer Care operational and customer service metrics, and how the Company plans to track and report progress metrics as AGIS is implemented.

Q. HOW IS THE COMPANY PRESENTING ITS OVERALL SUPPORT FOR THE AGIS INITIATIVE?

A. In addition to my testimony, a discussion of the overall AGIS initiative and customer experience is provided in the Direct Testimony of Mr. Gersack. The budget for AGIS implementation is primarily split between the Distribution Operations and Business Systems areas of the Company, as those areas are responsible for implementing the technologies and systems for the AGIS initiative. Company witnesses Ms. Kelly A. Bloch and Mr. David C. Harkness provide testimony for those business areas, respectively. Mr. Gersack provides support for program management costs and the overall AGIS customer experience. A summary of AGIS cost and benefits analyses are addressed in the Direct Testimony of Company witness Dr. Ravikrishna Duggirala.

Q. HOW IS THIS SECTION OF YOUR TESTIMONY ORGANIZED?

A. I first describe the AGIS initiative and Customer Care's role with respect to implementation. This includes an overview of the impacts, benefits and opportunities associated with AGIS from the Customer Care perspective.

I then discuss our current meter reading technology, what will change with installation of advanced meters, and how that affects meter reading operations.

Next, I discuss how Customer Care will provide support for AGIS during the advanced meter installation phase. While Mr. Gersack describes our overall customer education plan, I discuss how Customer Care will work in conjunction with Customer Communications to ensure customers are informed about the new meters and capabilities, and that we answer all questions as they arise. This includes plans for the Company's contact center as well as the meter installation vendor as it relates to direct contact with our customers. I also discuss the opt-out framework we have developed for customers who choose to decline advanced meter installation.

I then discuss impacts to billing operations and the minimal changes necessary to enable AMI billing. I also discuss how AGIS implementation will enable new capabilities, products and services, and the benefits related to Customer Care and certain other business areas that intersect. I detail which capabilities will be available to customers upon installation of the advanced meters, and which will be enabled through new products or services that will require separate Commission approval. For example, these future filings may address a pre-pay option for customers, use of remote reconnection and disconnection capabilities, or full residential time of use rates. We recognize that these new products and services will require additional filings with the Commission and may involve a stakeholder engagement processes to inform development, but they are important to understand in assessing the potential benefits of AGIS.

I also provide details related to the quantifiable benefits of AGIS implementation that are related to Customer Care. I describe these benefits here to support their inclusion in the Cost Benefit Analysis (CBA) as discussed by Dr. Duggirala.

Finally, I discuss tracking and reporting of Customer Care's operational and quality of service metrics. For those metrics that we expect will be impacted by AGIS implementation, I discuss how the Company plans to track and report these metrics as AGIS is implemented. I also discuss future filings with the Commission and separate proceedings that may be necessary to ensure stakeholder review and input relative to the Company's service quality reporting.

A. AGIS Overview

Q. WHAT IS AGIS?

A. The AGIS initiative is a comprehensive plan that will advance the Company's electric distribution system, provide customers with more choices, and enhance the way the Company serves its customers. AGIS provides the foundation for an interactive, intelligent, and efficient grid system that will be even more reliable and better prepared to meet the energy demands of the future.

Q. TO PROVIDE A FRAMEWORK FOR THE REMAINDER OF YOUR TESTIMONY, PLEASE IDENTIFY THE CORE COMPONENTS OF AGIS THAT WILL IMPACT THE CUSTOMER CARE ORGANIZATION.

A. As outlined in Mr. Gersack's testimony, and discussed in detail in the testimonies of Ms. Bloch and Mr. Harkness, the core components of AGIS

that will impact Customer Care are the Advanced Metering Infrastructure (AMI) and the Field Area Network (FAN).

- *AMI* is an integrated system of advanced meters, communication networks, and data processing and management systems that enables secure two-way communication between the Company's business and operational data systems and customer meters. AMI enables timely monitoring and communication between the meter and Advanced Distribution Management System (ADMS) about, among other things, energy usage and outages, and is a necessary first step to better customer data, enhanced customer service, and the addition of applications and options for future energy management and optionality.

- *The FAN* is the communications network that will enable communications between the existing communications infrastructure for the distribution system and the new advanced grid components.

These two components work in conjunction with the foundational ADMS that the Company is currently implementing.

Q. WHAT IS THE OVERALL IMPLEMENTATION SCHEDULE FOR AGIS?

A. As outlined by Mr. Gersack, the Company already has begun limited deployment of AMI and the FAN to support the Company's residential Time of Use (TOU) pilot scheduled to launch in April 2020. To ensure communications are in place for AMI functionality, the FAN deployment precedes AMI by approximately three to six months. Beyond the TOU pilot phase, our present AMI plan for Minnesota is to begin full AMI deployment

in 2021 and to conclude in 2024, in anticipation of the end of the support for AMR meters and the end of our present service agreement. Ms. Bloch and Mr. Harkness describe the implementation plan in more detail.

Q. HOW WILL THESE COMPONENTS IMPACT THE CUSTOMER CARE ORGANIZATION?

A. The availability of detailed and timely data, system automation, and communications enhancements, will impact and provide benefits for our customers and the Customer Care organization. As discussed in detail in Mr. Harkness' testimony, work of the Business Systems organization will include integration of AMI with "back office applications," meaning the software applications that support the Company's customer service needs, billing, payment remittance, service order management, outage management, meter reading, and asset inventory lifecycle management applications to utilize the customer data, outage data, and other information supplied by the advanced distribution grid. This will enable changes to current business practices, and positively transform the nature of interactions with our customers.

Further, as I will describe below, the process changes enabled by advanced grid implementation will help reduce Customer Care O&M expenses in meter reading, and potentially other areas.

Q. ARE THERE SPECIFIC COSTS FOR AGIS IMPLEMENTATION IN THE CUSTOMER CARE BUDGET IN THIS CASE?

A. No. The overall budget to implement AGIS is split between the Distribution Operations and Business Systems budgets, which are presented and supported in the testimonies of Ms. Bloch and Mr. Harkness. However, O&M cost

reductions attributed to reduced meter reading costs as a result of AGIS implementation are reflected in Customer Care's MYRP O&M budget in this case. I discuss this O&M cost reduction further in the next section.

Q. ARE THERE OTHER QUANTIFIABLE BENEFITS OF AGIS IMPLEMENTATION RELATED TO THE CUSTOMER CARE ORGANIZATION?

A. Yes. As it relates to the Customer Care organization, AMI technology enables cost reductions primarily due to remote connection and disconnection capabilities and improved data and analytics. Specifically, the Company anticipates benefits related to reductions in energy theft, consumption at inactive premises, and uncollectible/bad debt. I address these quantifiable benefits in Section F below, and Dr. Duggirala discusses how these benefits are reflected in the CBA.

Q. ARE THESE COST REDUCTIONS INCLUDED IN CUSTOMER CARE'S MYRP BUDGETS IN THIS CASE?

A. No. Unlike the meter reading O&M expense reduction, these benefits are not anticipated during the term of the multi-year rate plan. In addition, realization of these benefits may require future filings and Commission approvals.

B. Meters and Meter Reading

1. Current Meter Technology and Service Agreement

Q. PLEASE DESCRIBE THE COMPANY'S CURRENT METER TECHNOLOGY AND METER READING SERVICE AGREEMENT.

A. As discussed above, the Company currently uses AMR technology. Meter readings are collected and provided to the Company via a proprietary network by Cellnet. In addition to providing the meter readings, Cellnet owns and

maintains the communication network and software used to transmit the readings. Cellnet also owns and maintains meter communication modules which refers to the radio interface that is installed as part of the electric meter. The Company's payments to Cellnet for these services are reflected as O&M expense in our budgets.

The Cellnet AMR system in service in Minnesota is nearing end of life. Cellnet has informed the Company that it will stop manufacturing the AMR meter reading modules and components compatible with the current system in 2022, so there will be no support for ongoing maintenance after that time. Further, our current contract with Cellnet for meter reading services ends at the end of 2025, with an option to extend it through 2026 at increased cost.

Given these circumstances, the Company must plan an electric metering solution for the years 2022 and beyond. Ms. Bloch and Mr. Harkness discuss the Company's approach to this process, our consideration of alternatives, and the additional customer and system benefits enabled by advanced metering technology. Below I describe how the AMI and FAN solutions affect customers through our Customer Care organization.

2. AMI and Meter Reading Cost Reductions

Q. PLEASE DESCRIBE, AT A HIGH LEVEL, THE AMI TECHNOLOGY THE COMPANY IS PROPOSING TO IMPLEMENT.

A. AMI is a system of advanced meters, communication networks, and data processing and management systems that enables secure two-way communication between Xcel Energy's business and operational data systems and customer meters. AMI enables timely monitoring and communication

about, among other things, energy usage and outages, and is a necessary first step to better customer data, enhanced customer service, and the addition of applications and options for future energy management and optionality.

Q. PLEASE DISCUSS THE CURRENT CELLNET CONTRACT IN LIGHT OF THE PLANNED TRANSITION TO AMI.

A. The current Cellnet contract requires the Company to pay for meter reading services for a minimum of two million (total electric and gas) meters through December 31, 2021. The Company currently has 2.4 million Cellnet meters in service. Beginning in 2022, the Company can reduce meter reading costs when it transitions below two million Cellnet meters as a result of our anticipated AMI deployment schedule. Customer Care's meter reading O&M expenses would decline over time as AMI electric meters are deployed in Minnesota. These reductions are incorporated into our O&M budget in this case.

Q. HOW WILL METER READING CHANGE AFTER AMI DEPLOYMENT?

A. AMI technology will provide for automated meter reading via the Company-owned FAN communications network. There may be instances when a meter is not read by the AMI system, primarily due to network communication issues or meter issues. In these cases, the meter will be manually read, which is the same as we do today when the Cellnet system is unable to communicate with a specific meter. In addition, there may be customers who opt-out of AMI meter installation, which will require that the Company manually read meters for these customers. In the following section, I discuss the Company's plans for allowing customers to opt out of an AMI meter if they choose.

Q. WHAT ARE THE FORECASTED METER READING O&M COST REDUCTIONS ASSOCIATED WITH AMI DEPLOYMENT?

A. The forecasted O&M cost reductions associated with AMI deployment that are reflected in Customer Care's 2020 through 2022 budgets are represented in a separate line item "reduction" based on our forecasted deployment timeline. O&M budget reductions would generally grow over time as meters are deployed, reaching almost $8.9 million in annual savings by 2024. These cost savings are shown in Table 12 below.

Table 12

Anticipated Customer Care O&M Savings in Meter Reading Costs

From AMI Electric Meter Deployment

State of Minnesota Electric

Year	Customer Care O&M Savings	Annual AMI Meter Deployment	Cumulative AMI Meter Deployment
2019	$4,000	8,916	8,916
2020	$95,000	8,584	17,500
2021	$786,000	121,800	139,300
2022	$3,097,000	630,000	769,300
2023	$8,231,000	590,000	1,359,300
2024	$8,875,000	40,000	1,399,300

These reductions are reflected in Customer Care's O&M budget forecasts for 2020-2022 in this case. In Section F, I discuss how the Cost-Benefit analysis presented by Dr. Duggirala incorporates this reduction over the term addressed by the CBA.

C. AMI Installation

1. Customer Care Support for AMI Installation

Q. WHAT ARE CUSTOMER CARE'S PLANS TO SUPPORT AMI INSTALLATION BEGINNING IN 2021?

A. Customer Care is working closely with Customer Communications to support all phases of the Customer Communications and Education Plan (Communications Plan) discussed in Mr. Gersack's direct testimony. This Communications Plan is designed to inform customers before, during, and after AMI deployment regarding what they can expect and how they can use and benefit from AMI.

Q. HOW WILL YOU PREPARE CUSTOMER CARE EMPLOYEES TO PROVIDE SUPPORT TO CUSTOMERS REGARDING THE AMI DEPLOYMENT?

A. Training for Customer Care employees is an important step to enhance customer understanding and satisfaction, as well as reduce customer complaints. In anticipation of AMI deployment in Colorado, we have already developed and started to deliver training to Customer Care employees regarding AMI technology, the benefits for customers, and how it will impact their work. This training will help prepare our employees for Minnesota AMI meter deployment, as well as for deployments in other states, such as Colorado.

Training has been and will continue to be developed and delivered based on an employee's role in the organization, what they need to know to do their job, and when they need to know it. The Company has utilized training experts from inside and outside the organization to create the training developed so far. Training development and delivery is an existing function

and competency within the Company today. Customer Care employees receive training throughout the year to perform their jobs well and learn about changes impacting their work to best serve customers. AMI-related training development and delivery will continue as new knowledge needs to be shared over time.

All Customer Care employees will take general AMI program overview training to become familiar with the technology, benefits and general program plan. After that, training will be tailored to an employee's role. For example, a contact center agent would take training regarding the Minnesota TOU pilot, how a customer can opt out of the TOU pilot, and how to handle an AMI-related customer inquiry. Some of the training is universal and applies to AMI implementation in any state. Other training will be targeted to a particular state's deployment and offerings. The training is delivered and assigned through an online Learning Management System (LMS) for efficient delivery and tracking to insure completion within appropriate timeframes.

Q. WHAT EFFORTS WILL THE COMPANY UNDERTAKE TO HELP MITIGATE ANY INCONVENIENCE TO CUSTOMERS DURING AMI DEPLOYMENT?

A. The Communications Plan noted earlier uses an integrated, expansive, and multi-channel approach to reach as many customers a possible. The plan is designed to build awareness of advanced grid capabilities, proactively educate customers about the AMI installation process, and keep customers informed at every stage leading up to installation and during installation. Customer Care is working closely with Customer Communications to provide the necessary information and answer questions when customers contact our call centers. In addition, as I discuss in the next section, we are developing plans with

respect to our meter installation vendor as they will also have direct contact with our customers.

Q. WHAT ARE CUSTOMER CARE'S PLANS TO TRACK CUSTOMER FEEDBACK RELATED TO AMI INSTALLATION?

A. I discuss our plans for tracking customer feedback in our service quality reporting in Section G below, along with our plans for tracking call center activity related to AMI installation.

2. Meter Installation Vendor Support

Q. HOW DOES CUSTOMER CARE PLAN TO WORK WITH THE METER INSTALLATION VENDOR DURING AMI DEPLOYMENT?

A. The Company is committed to working with our meter installation vendor during AMI implementation to ensure our customers receive excellent service. We recognize that due to the volume of meter installations and the number of customers affected during the AMI deployment phases, the impact goes well beyond that of any other projects we would engage in during the normal course of providing service to our customers. As such, the Company and the meter installation vendor will work together to provide coordinated support and address all customer inquiries and any issues that may arise.

Q. PLEASE DISCUSS AT A HIGH LEVEL THE METER INSTALLATION VENDOR SELECTED BY THE COMPANY.

A. The Company selected Itron as the AMI meter vendor to provide the meters, installation, and project management. Ms. Bloch discusses the Itron selection for AMI meters in her testimony. Itron has extensive experience providing direct customer support during AMI meter deployments. They have worked

on projects for several utilities, including Consumers Energy (1.8 million electric and 600,000 gas meter AMI deployment) and British Columbia Hydro (1.8 million electric meter AMI deployment currently in progress). They will also begin work for Nova Scotia Power (500,000 electric meter AMI deployment) in October 2019.

Q. PLEASE DISCUSS HOW THE COMPANY AND METER VENDOR WILL COORDINATE CUSTOMER SERVICE EFFORTS.

A. Itron is committed to working with the Company to address and resolve all customer inquiries related to the new meters throughout deployment. This will involve any communications received via telephone, email, letter, social media, PUC complaint, or other communication channel.

The meter installation vendor will be a key point of contact for the Company's customers during the meter installation process and will have a dedicated call center phone number for Xcel Energy's customers. The various communications and materials we plan to provide to customers prior to and during the installation will include specific directions to ensure our customers have the right contact information so any questions or issues will be resolved as quickly as possible. Our plan is to direct customers to call the vendor with any questions related to installation. However, if the vendor receives calls that should instead be directed to the Company, the vendor will also have the ability to warm transfer calls to the Company. (Warm transfer means the vendor representative would remain on the line to ensure the call is answered and the customer is successfully connected with a live Company agent.) Similarly, the Company will have the ability to warm transfer calls to the meter installation vendor as needed.

3. Opt-Out Provisions

Q. PLEASE DESCRIBE THE OPT-OUT PROVISIONS FOR CUSTOMERS ELECTING TO DECLINE INSTALLATION OF ADVANCED METER TECHNOLOGY.

A. The Company can provide the greatest benefits for all our customers by deploying advanced meters throughout our entire service territory. We also recognize the importance of providing our customers with the opportunity to decline the installation of an advanced meter, or have an advanced meter removed at any time, and discuss how we intend to provide clear information regarding this option.

We intend to provide the option for eligible customers to decline installation of an AMI meter. However, we believe these customers should also pay the cost of doing so in light of standard cost-causation principles. For a customer choosing a non-transmitting meter, the Company would need to manually probe the meter to obtain data for billing and energy use analysis, instead of having an AMI meter transmit meter readings electronically. The full set of data, including interval readings, would still be available to customers and could be used to bill advanced rates, such as time of use. This data would be available on a monthly basis after the readings were manually obtained, but it would not be transmitted at the time the interval readings occurred. This results in incrementally higher metering costs for the customer who opts out of an advanced meter.

Q. HOW DOES OPTING OUT OF AN AMI METER RESULT IN INCREMENTAL COSTS?

A. Primarily, the incremental costs associated with opting out of an AMI meter are due to the need for manual meter readings. This includes the cost to obtain manual meter readings in the field to bill consumption. There would

also be incremental cost for field visits to remove a meter that does not communicate meter readings electronically and install an AMI meter for the next customer at that premise, or install a meter that does not communicate meter readings electronically after the initial meter deployment has occurred. We do not believe an additional charge associated with initial meter installation would be required if a customer made this choice prior to or at the time of initial meter deployment.

Q. PLEASE OUTLINE THE PROCESS FOR REQUESTING COMMISSION APPROVAL OF OPT-OUT PROVISIONS.

A. We plan to submit a separate filing with the Commission with our detailed opt-out proposal in 2020. Initial deployment of advanced meters is anticipated to begin in 2021. The timing of our filing will allow enough time for the proceeding to include stakeholder input and final Commission approval so that we can incorporate the necessary information when we begin pre-deployment communications with our customers. Our proposal will include the necessary tariff sheets reflecting the incremental costs and service provisions for customers who decline installation of AMI meters or choose to have the AMI meter removed at any time, as well as any associated rule variances.

D. Billing

Q. HOW WILL AMI IMPLEMENTATION AFFECT CUSTOMER BILLS?

A. AMI billing itself will result in one minor change to the customer bill, which will require a variance from Minn. R 7820.3500 on billing content. Minn. R 7820.3500 (A) requires that a customer's bill include "the present and last preceding meter readings." Customer bills currently include this information,

with usage for the billing period determined as the difference between these two meter readings. In contrast, interval billing using AMI technology does not use this method of subtraction to calculate usage; instead, it individually measures consumption at predictable intervals (for example, every 15 minutes) and calculates the total amount to be billed for a given period without reference to the prior billing period. As such, with no other billing format changes, AMI bills will show 0 for the "previous reading," and the "current reading" will show the total energy usage for the billing period.

I note that the Company already bills many larger commercial customers using interval meter readings today, so our billing employees are familiar with this type of billing.

Although the necessary bill format change is limited as described above, with AMI, customers will be provided additional granular information and energy usage data on the MyAccount web portal. For customers opting into potential new services enabled by AMI technology, information may also be provided via other digital channels, which is discussed further in Mr. Gersack's testimony

Q. IS THE COMPANY REQUESTING THIS RULE VARIANCE AS PART OF THIS RATE CASE FILING?

A. No. We plan to submit a separate filing with the Commission requesting approval of the necessary rule variance in 2020. Initial deployment of advanced meters is anticipated to begin in late 2021. The timing of our filing will allow enough time for Commission review and approval prior to commencement of AMI installation.

Q. IS THE COMPANY ALSO CONSIDERING BILL FORMAT CHANGES?

A. Yes. As part of the coordinated customer experience efforts planned in 2020, a team will be re-evaluating the bill format in light of AMI deployment and considering other best practices. As a result, the Company may wish to propose additional bill format changes prior to AMI installation. We may submit a filing encompassing all proposed changes, not only the limited format change that may be required to implement AMI billing itself.

Q. HOW WILL AMI IMPLEMENTATION AFFECT CUSTOMER CARE'S BILLING OPERATIONS?

A. Billing Operations will perform the same work it does today, which is to address exceptions identified by the customer meter data and billing systems because they fall outside of established parameters and require intervention. The volume of meter data and billing exceptions that need to be handled by Billing Operations is expected to increase given the large number of meter exchanges that will occur during meter deployment.

Q. PLEASE DESCRIBE THE ADDITIONAL WORK ANTICIPATED WITH THE METER EXCHANGES.

A. Although the change to the actual customer bill is limited as described above, a typical meter exchange bill can be complex due to the meter being exchanged in the middle of a billing cycle and the manual entry of information. A sample bill showing a typical meter exchange bill is provided as Exhibit___(CCC)-1), Schedule 9.

Q. WHY DO METER EXCHANGE EXCEPTIONS GENERALLY OCCUR?

A. Meter exchange exceptions occur for several reasons, including a final reading that is incorrectly entered from a removed meter, an error in the date noted for the meter exchange, or a meter exchange that occurs during the normal billing window for a premise. An exception requiring intervention is typically flagged using pre-determined system parameters. Once flagged, it is routed to a work queue for review by Billing Operations. This typically happens before a bill is issued to a customer. Rarely, a bill may be issued containing an error. When the Company is notified by a customer of an error, a bill may need to be cancelled and re-issued.

Q. WILL AMI HAVE ANY IMPACT ON CUSTOMER CARE'S METER READING OR BILLING METRICS THAT ARE REPORTED UNDER THE SERVICE QUALITY RULES?

A. As with any comprehensive deployment of meter equipment and systems, the Company expects there may be an impact to meter reading or billing statistics initially during the installation phase, but not over the longer term. As I discuss further in Section G below, we will track and report these statistics using the established service quality reporting process. Any impacts specifically related to AGIS will be addressed in our separate service quality proceedings.

E. Customer Care Benefits

Q. PLEASE PROVIDE A BRIEF OVERVIEW OF AMI IMPLEMENTATION FROM A CUSTOMER CARE PERSPECTIVE AND THE IMPACTS AND BENEFITS TO THE CUSTOMER CARE ORGANIZATION.

A. Initial deployment of advanced meters is anticipated to begin in late 2021. This initial deployment will be heavily focused on "getting the basics right."

For Customer Care, the basics include things like accurate, on-time customer billing, and ensuring we provide meaningful information and resolve any issues for customers about the installation process for new AMI meters.

Building on the basics, Mr. Gersack discusses in more detail how we intend to deploy new products and services, or improve existing services for our customers. We will take a judicious approach to deploying new products and services, focusing on areas where the cost-benefit is the highest, or where the satisfaction value is highest for our customers. Some of these new services impacting Customer Care may include a pre-pay billing option and remote connection and disconnection.

To enable the customer benefits or cost-savings these services would provide, we will need to make separate filings for Commission approval. In the following section I provide information on the quantifiable benefits that these services or AMI implementation, in general, are expected to provide.

Q. HOW WILL THE COMPANY PURSUE THE ADDITIONAL REGULATORY AND TARIFF CHANGES THAT WILL BE NEEDED TO ENABLE THE TRANSITION TO AMI METER TECHNOLOGY?

A. The Company plans to make a separate filing in 2020 to request approval of the rule variance that will be needed to transition to AMI meters.

In addition, to leverage the operational functionality the technology enables, we would also make separate filings for approval of any new products or services that may follow in the future. We recognize there are stakeholders who will have interest in these matters and how any changes affect customers.

We believe it is important to engage in a process to solicit stakeholder perspectives, discuss options, consider implications, and seek consensus; and intend to do so as we contemplate future services.

Q. WHAT ARE THE BENEFITS ASSOCIATED WITH REMOTE CONNECTION AND DISCONNECTION CAPABILITIES ENABLED BY AMI TECHNOLOGY?

A. The ability to remotely connect or disconnect service, when paired with customer protections, provides both cost and convenience benefits. When a customer wants to start service at a single-phase premise today, a field visit is necessary. This involves a fee for the customer and requires someone to be present at the location to meet a Company representative. With remote connection capability, a customer would not need to be present and a lower fee could be possible.

Another scenario where remote capabilities could be beneficial for a customer involves seasonal disconnections, where a customer may want electric service disconnected for a lengthy period of time because a home is unused. Instead of incurring the cost for two field visits to disconnect and reconnect service, a customer could schedule a remote disconnection and reconnection aligned with their occupancy needs. This would save customers money through reduced fees and energy usage and would be more convenient for them.

There would also be benefits when changes in tenants occur. AMI remote disconnection will enable the Company to disconnect electric service between tenants if there was no landlord agreement in place. Today, it is typically cost prohibitive to disconnect the account given the expense to send employees into the field. This is considered part of the line loss factor and can result in

electricity being consumed with no responsible party to bill. While this benefit does not reside in Customer Care's O&M budget, Customer Care could positively reduce this loss by changing current business practices through AMI remote disconnection functionality. Remote disconnection and reconnection can also help reduce the cost of an unoccupied retail location for a building owner who has a vacant property that is between tenants as well.

Q. WHAT REGULATORY APPROVALS WOULD BE NEEDED TO IMPLEMENT REMOTE DISCONNECTION AND RECONNECTION OF SERVICE?

A. Use of remote connection/disconnection capabilities of AMI would require a variance from Minn. R 7820.2500, which requires a field visit prior to disconnection of service. This would be to enable the benefits described above related to start, stop, and transfer of service, shut-off between tenants, and seasonal disconnect/reconnect.

Q. DOES THE COMPANY PLAN TO MAKE A FILING TO ENABLE THE BENEFITS OF REMOTE CONNECTION/DISCONNECTION CAPABILITIES?

A. Yes. The Company anticipates submitting this filing in the future, and will include in such a filing a discussion of customer protections and benefits at that time. As I discuss further below, the AMI CBA assumes a level of cost reduction for remote connect/disconnect capabilities beginning in 2023. The Company would make a filing requesting Commission approvals necessary to enable these capabilities, allowing for stakeholder input into proposed changes and service provisions.

Q. ARE THERE OVERALL ADDITIONAL BENEFITS ASSOCIATED WITH REMOTE CONNECTION AND DISCONNECTION CAPABILITIES USED IN CONNECTION WITH NON-PAYMENT?

A. Yes. I note that for customers experiencing payment issues, the Company works to engage with them through proactive contacts, encourages them to seek energy assistance, and tries to establish a payment plan that works with their budget and personal situation. However, in cases where disconnection for non-payment is appropriate, the Company incurs significant costs to disconnect service. These costs are ultimately borne by a combination of the affected customers and the customer base as a whole. In addition, remote reconnection of service would reduce the cost of reconnecting service and enable faster service restoration for disconnected customers. Customer and employee safety would be enhanced as well.

While the Company believes it will be important to consider the use of remote disconnection and reconnection for customer non-payment, we recognize that any proposed changes would need to be addressed in a separate proceeding before the Commission. Implementing remote disconnection through AMI for non-paying accounts would require approval of a variance to Minn. R 7820.2500, as described above, as well as changes to our collection practices. The Company would engage with stakeholders during the development of any processes and procedures the Company would ultimately propose for Commission approval that would leverage these capabilities of the advanced grid.

Q. ARE THERE OTHER CAPABILITIES ENABLED BY AMI THAT PROVIDE ADDITIONAL CUSTOMER CARE BENEFITS?

A. Yes. Improved data and analytics enabled by AMI technology will also help reduce energy theft through better detection and prevention capability, which can provide an overall cost benefit for all of our customers. Today, customers who have been disconnected and try to reconnect their service illegally typically do so by removing the meter, removing the "boots" placed on the meter contacts, and then replacing the meter. This is an extremely unsafe and illegal practice. When AMI technology is in place, remotely disconnecting service will involve opening a disconnection switch on the meter to disconnect power to the customer. However, the meter still has power and can communicate over the network. If a customer removes the meter from the socket to bypass it, the Company would receive a notification flag over the network to indicate meter tampering. This will improve detection of instances where customers illegally bypass our meter to receive electricity without paying for it. These situations require time-intensive identification to detect today, but they can be detected automatically through AMI technology. For safety reasons, however, these situations will still require a physical visit to remedy.

Q. HOW DO ADVANCED GRID CAPABILITIES ENABLE THE PRE-PAYMENT OPTION YOU MENTIONED EARLIER IN YOUR TESTIMONY?

A. The advanced grid enables the Company to offer a pre-payment option due to the frequent energy usage measurements provided by AMI metering, and the ability to remotely disconnect and reconnect service.

Q. WHAT ARE THE BENEFITS OF OFFERING CUSTOMERS A PRE-PAY OPTION?

A. The main direct benefits for customers are fewer missed payments and no late payment fees, helping customers save money on their energy bills, and giving them greater control. Utility companies benefit from fewer missed payments, reduced costs for disconnections due to non-payment, and generally reduced costs and financial risk, which ultimately also benefit our customers. Several other utilities offer this option to customers, including Salt River Project, Alabama Power, APS, and Consumers Energy.

Q. DOES THE COMPANY ANTICIPATE OFFERING THIS PAYMENT OPTION TO CUSTOMERS?

A. Yes. The Company would like to offer a pre-payment option in the future enabled by our proposed investments in advanced grid technology and plans to include a detailed proposal in a future regulatory filing.

F. Quantifiable Benefits

Q. WHAT INFORMATION DO YOU PROVIDE IN THIS SECTION?

A. In this section, I discuss the quantifiable benefits of AGIS implementation that are related to Customer Care. I describe these benefits here to support their inclusion in the CBA as discussed by Dr. Duggirala. These benefits include:

- Reduction in meter reading costs;
- Reduction in the amount of energy theft;
- Reduced consumption at inactive premises; and
- Reduced uncollectible/bad debt.

Although the reduction in energy theft and reduced consumption at inactive premises would not impact Customer Care's O&M budget, these benefits are

related to Customer Care operations and processes so are discussed in my testimony. The bad debt O&M expense reduction would impact Customer Care's O&M budget, but is not included in our budget in this case because these benefits are assumed to begin after the multi-year rate plan period. Additionally, to enable the necessary capabilities to realize the reduction in the amount of energy theft and bad debt expense, the Company would need to submit separate filings with the Commission.

Q. HOW DID THE COMPANY QUANTIFY THE REDUCTION IN METER READING EXPENSES?

A. First, I note that the reduction in meter reading O&M expense is reflected in the Customer Care O&M rate case budget forecast. This is due to AMI implementation that will begin during the multi-year rate plan.

Q. ARE THESE O&M REDUCTIONS REFLECTED IN THE AMI CBA?

A. Yes, but not as a separate line item. The CBA presented by Dr. Duggirala essentially looks at AMI costs and benefits compared to a reference case scenario, which is an AMR drive-by basic alternative. In other words, by implementing AMI, the Company will avoid costs associated with the alternative of replacing the current AMR Cellnet meter reading services with another service or potential drive-by meter reading option. This is a fixed benefit value calculated at the time the CBA analysis was done. The amount represents an avoided cost of a potential AMR basic alternative, besides AMI investment, since the current Cellnet system requires replacement in any case, as I discussed earlier. In this way, the meter reading O&M cost reduction is reflected in the CBA, not as cost reduction or "benefit" of AMI itself, but rather, as it is incorporated into the cost of the AMR alternative.

The avoided O&M meter reading expense was calculated by comparing the projected costs to replace the Cellnet system with a drive-by AMR solution. These reductions are included in the AMI cost benefit analysis as shown in Exhibit___(CCC-1), Schedule 10.

Q. HOW DID THE COMPANY QUANTIFY THE REDUCTION IN ENERGY THEFT?

A. As described above, the improved data and analytics enabled by AMI technology will help reduce meter tampering and energy theft through better detection and prevention capability, which can provide an overall benefit for all of our customers. To differentiate these instances more quickly from dead and malfunctioning meters, the Company will use an analytics software that enables frequent recording of energy consumption and detect anomalous patterns of energy resulting from theft and tampering. The Company will proceed to change the meter or make field adjustments and bring the situation to a normal condition, and will then bill and charge to customers the appropriate unbilled estimates.

To quantify these benefits, the Company estimated the reduction in the amount unbilled energy. We based this estimate on average sales for the five-year period 2014-2018. Industry organizations, such as EEI, estimate between 1 percent and 2 percent of revenue is lost to tampering and theft. Because there is no way to actually track this amount, the Company used 1 percent to provide a conservative estimate of lost revenue due to tampering and theft. Using the estimated amount of lost revenue, the Company's benefit calculation provides a conservative estimate of 0.1 percent (residential) and 0.15 percent (small C&I) reduction in unbilled energy. In other words, the Company anticipates the estimated lost revenue amount will decrease by these

percentages. As a comparison, the Company also looked at Ameren Illinois' business case for AMI implementation. Our estimate is consistent with Ameren's energy theft reduction estimate.

As noted above, this benefit does not result in a reduction to the Customer Care budget, but rather an overall reduction to costs for energy that would not be offset by revenue. These reductions are included in the AMI cost benefit analysis as shown in Schedule 10.

Q. HOW DID THE COMPANY QUANTIFY THE REDUCTION IN CONSUMPTION ON INACTIVE METERS?

A. This benefit is related to electric consumption during a gap between two separate user accounts and the process to disconnect and connect service between tenants or owners. With the remote connect/disconnect capability; the Company will reduce usage on inactive meters.

To quantify these benefits, the Company calculated the average cost of consumption on inactive meters between the years 2014 through 2018, and estimates a 20 percent benefit. We believe this is a conservative benefit estimate.

As a comparison, the Company also looked at Ameren's business case for AMI implementation, which included a 56 percent reduction in consumption on inactive meters. Xcel Energy took a conservative approach for this benefit estimate due to Minnesota's Cold Weather Rule and the assumption that the Company will continue with its current practice, choosing not to disconnect residential heat-affected premises in the winter. With Minnesota's cold

weather disconnection rules in effect between October 15 and April 15 (six months of the year), we believe a conservative benefit estimate would be half of Ameren's estimated benefit. This assumption is based, in part, on the difference between Illinois and Minnesota winter disconnection rules. The Illinois winter disconnection rule applies only if a customer is an electric heat customer and electricity is the customer's primary heat source. Additionally, the period it is in effect is shorter in duration than Minnesota's and does not apply to premises that do not have a responsible party. Even though not entirely comparable, our comparison with Ameren's estimate is informative. Further, our benefit estimate also assumes the Company would not use remote disconnection when there is a gap between tenants of less than three days. For these reasons, we believe our 20 percent benefit estimate is conservative.

As noted above, this benefit does not result in a reduction to the Customer Care budget, but rather an overall reduction to costs for energy that would not be offset by revenue. These reductions are included in the AMI cost benefit analysis as shown in Schedule 10.

Q. HOW DID THE COMPANY QUANTIFY THE POTENTIAL REDUCTION IN COMMODITY BAD DEBT EXPENSE?

A. Due to the manual nature of the existing disconnect for non-payment process, the Company is not able to complete all the physical disconnections for non-payment orders issued in a given year. As described above, the Company plans to propose the use of the AMI remote disconnect capabilities in the future as approved by the Commission, with input from stakeholders. This would result in a reduction in commodity bad debt expense.

To quantify these benefits, the Company calculated the average commodity bad debt expense between the years 2014 through 2018, and estimates that an 8 percent reduction in residential customer commodity bad-debt expense could be realized. This estimate is consistent with data provided to the Federal Energy Regulatory Commission in other utilities' pre- and post-AMI deployment reporting. We looked at eight utilities comparable to Xcel Energy and calculated the average commodity bad debt expense reduction, comparing their post-AMI deployment reports to pre-AMI deployment reports. Our estimate is consistent with the average. I also note that the remote disconnect capability may also reduce non-commodity bad debt expense, but non-commodity bad debt makes up only a small portion of Customer Care's bad debt expense. Regardless, we have not assumed any benefit associated with non-commodity bad debt expense in the CBA.

As described above, with the necessary regulatory approvals, these benefits would be reflected in Customer Care's O&M budgets in the future as a reduction in bad debt expense. These reductions are included in the AMI cost benefit analysis as shown in Schedule 10.

G. Metrics and Reporting

Q. WHAT INFORMATION DO YOU PROVIDE IN THIS SECTION?

A. In this section I discuss the tracking and reporting of Customer Care's operational and quality of service metrics. For those metrics that we expect will be impacted by AGIS implementation, I discuss how the Company plans to track and report these metrics as AGIS is implemented. I also discuss our future service quality filings with the Commission, as we believe those

proceedings provide the appropriate venue to ensure stakeholder input relative to the Company's service quality reporting.

Q. HOW DOES THE COMPANY CURRENTLY REPORT SERVICE QUALITY METRICS?

A. Like other utilities, the Company reports service quality metrics under Minn. R 7826, Electric Utility Standards, on safety, reliability, and service quality. The Company also has a Quality of Service Plan (QSP)[7] that includes additional metrics, specifies thresholds, and includes penalties for performance not meeting the thresholds. Our service quality tariff was established and has evolved over many years in proceedings before the Commission, and is the result of extensive stakeholder input and agreements. Given the process to establish those metrics and baseline performance thresholds, we propose to address any changes in a separate proceeding to allow for full stakeholder review and input on any changes that may be necessary.

Q. HOW DOES THE COMPANY EXPECT AMI DEPLOYMENT AND AMI FUNCTIONALITY WILL IMPACT THE CUSTOMER CARE SERVICE QUALITY METRICS?

A. We believe several metrics related to Customer Care in the Company's QSP may be impacted and should be reviewed and re-evaluated in light of an AMI deployment. The QSP metrics that could be impacted both during and after AMI rollout include: customer complaints; billing accuracy and timeliness; and telephone response time. Ms. Bloch discusses potential impacts to QSP metrics related to Distribution Operations in her testimony.

[7] See the Company's Minnesota Electric Rate Book, Section 6, General Rules and Regulations, Subsection 1.9, Service Quality.

Q. HOW COULD THE LEVEL OF CUSTOMER COMPLAINTS, AS MEASURED BY THE CUSTOMER COMPLAINT QSP METRIC, BE IMPACTED BY AMI DEPLOYMENT AND ENABLING AMI FUNCTIONALITY?

A. The Company will carefully plan and seeks to deliver a seamless and easy experience for customers as they receive their new electric meter and understand and use the information and insights it will provide. However, we recognize that some customer dissatisfaction, resulting in increased customer complaints, could occur as we visit 1.4 million customer premises to exchange electric meters. This meter deployment is not business as usual.

Q. DESCRIBE HOW THE CUSTOMER COMPLAINT QSP METRIC IS CALCULATED AND HOW IT WORKS TODAY.

A. Currently, the Company has a limit on the number of complaints per customer that can be filed with the Commission in a year. Exceeding the complaint limit of 0.2059 complaints per 1,000 customers carries a $1 million fine annually. The number of customers in this metric is measured by the total number of natural gas and electric meters reported annually to the Commission.

The complaint limit is based on historical performance, reflects past business practices, and does not consider fault. Every complaint filed by a customer counts against the Company's annual limit, regardless of whether the Company adhered to rules, tariffs, and reasonable business practices, or whether the complaint otherwise has any merit.

Q. HOW DOES THE COMPANY EXPECT AMI IMPLEMENTATION MAY IMPACT THE NUMBER OF CUSTOMER COMPLAINTS?

A. While the Company has not exceeded the complaint limit since the QSP has been in place, we believe this significant initiative to convert to AMI meters warrants consideration of how complaints will be counted against a QSP limit both during and after deployment. The Company has created complaint-type codes related to AMI that could be used for tracking AMI-related complaints during deployment. This could be used to monitor and exclude these complaints from the QSP limit during meter deployment. In addition, complaint levels could be impacted beyond meter deployment, especially concerning potential changes to collections practices if such changes are approved by the Commission through a later filing.

Q. HOW COULD BILLING ACCURACY AND TIMELINESS METRICS, AS MEASURED BY THE INVOICE ACCURACY AND INVOICE ADJUSTMENT TIMELINESS QSP METRICS, BE IMPACTED BY AMI DEPLOYMENT?

A. The large volume of meter exchanges that will occur during a mass meter deployment will generate billing exception work requiring manual intervention as described earlier. Exception work is normal and occurs during the course of business today. However, the volume of meter exchanges that will occur during AMI deployment and the time required to process the resulting exceptions could impact both the invoice accuracy and invoice adjustment timeliness metrics.

The Company believes that invoice accuracy and invoice adjustment timeliness could be impacted during deployment, but should not be impacted following that timeframe. The Company believes an exclusion to the QSP

penalty for these two metrics may be appropriate during the deployment window. The Company could still report performance during the deployment for trending and transparency. The Company will closely monitor Billing Operations work during meter deployment and will determine whether staffing increases may be warranted.

Q. HOW COULD TELEPHONE RESPONSE TIME, AS MEASURED BY THE TELEPHONE RESPONSE TIME QSP METRIC, BE IMPACTED BY AMI DEPLOYMENT?

A. The telephone response time QSP metric measures the percent of calls into the Company's contact centers or business office that are answered within 20 seconds during a year.

While customers will be advised to contact the meter deployment vendor regarding meter deployment issues, we recognize that some customers will contact the Company's customer service number instead. This could increase call volume and impact telephone response time during meter deployment, which could adversely impact the telephone response time metric. It is also reasonable to assume that customers may have questions regarding their new meter, its functionality and how to use it, as well as any new rates that may impact them.

While there may be impacts to telephone response time during and after deployment, the level of that impact is not known at this time. Customer education is being carefully planned to inform customers about their new meter and its benefits to help answer questions at the time they are most likely to have them. A digital experience, including a customer portal, will be deployed for customers to use and interact with their enhanced usage data and

insights as well. Mr. Gersack discusses the customer education plan and customer portal functionality.

The Company will monitor call center volume and performance and will make every effort to maintain the prompt telephone response time our customers receive from us today, which may require staffing increases not included in O&M budgets today. The Company proposes to address call center response time in our service quality report, to the extent this QSP metric may be impacted as we move through the AMI deployment process and actual deployment impacts become better known.

H. AGIS Customer Care Summary

Q. PLEASE SUMMARIZE YOUR TESTIMONY AS IT RELATES TO CUSTOMER CARE'S RESPONSIBILITIES WITH RESPECT TO IMPLEMENTATION OF THE AGIS INITIATIVE.

A. Implementation of the AGIS initiative, and specifically advanced metering technology and the communications network, will enable the availability of detailed and timely data, system automation, and communications enhancements that will impact and provide benefits for our customers and the Customer Care organization. The process changes enabled by advanced grid implementation will help reduce Customer Care O&M expenses in meter reading, and potentially other areas. Customer Care has plans in place with respect to customer service, meter reading, and billing during AMI deployment and beyond as future advanced grid capabilities are enabled.

Q. PLEASE SUMMARIZE THE COMPANY'S PLANS WITH RESPECT TO FUTURE FILINGS NECESSARY FOR AMI IMPLEMENTATION, AS WELL AS THOSE TO ADDRESS FUTURE CAPABILITIES AND IMPACTS OF AGIS.

A. The Company intends to submit the following future filings requesting necessary Commission approvals and eliciting stakeholder input:

- Opt-out provisions – requesting approval of the processes, cost structure, and tariffs necessary to allow customers to opt out of AMI meter installation (2020);
- AMI billing – requesting approval of a rule variance and any tariff changes necessary to enable AMI interval billing (2020);
- Future filing to enable remote connect/disconnect capabilities;
- Future filing to request approval of a pre-pay option for customers; and
- Future service quality reporting under Minnesota Rules (beginning April 1, 2022) and the Company's QSP (beginning May 1, 2022) to address any impacts to service quality metrics as a result of AGIS implementation.

VI. CONCLUSION

Q. PLEASE SUMMARIZE YOUR TESTIMONY.

A. The Customer Care organization continues to achieve strong customer satisfaction results and effectively manage its O&M expense levels. It continues to perform favorably to other electric utilities in managing bad debt expense and the cost to perform overall Customer Care functions. Therefore, the Customer Care organization's overall O&M expenses, including commodity and non-commodity bad debt expense, are reasonable and should be approved. Finally, Customer Care is preparing to realize the benefits of

AMI deployment through reduced O&M costs for meter reading and improved service offerings to customers.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes, it does.

Résumé

Christopher C. Cardenas
Vice President, Customer Care
Xcel Energy
1800 Larimer Street, Suite 1500, Denver, Colorado

Current Responsibilities (2019 - Present)

Provides leadership and direction for the Company's customer care functions, including meter reading, field collection, billing, credit and collection, customer contact centers, and related business support functions.

Previous Positions

PPL Electric Utilities
2014 - 2018 Vice President, Customer Services

Time Warner Cable
2012 – 2014 Vice President, Customer Service Operations

Comcast Cable
2011 – 2012 Director, Customer Service

U.S. Cellular
2007 – 2010 Director, Customer Service Operations

Sprint
2001 – 2007 Senior Manager, Business Customer Support

Education

Bachelor's Degree, Business Administration in Finance, Texas Lutheran University; Master's Degree, Business Administration (Finance emphasis), Webster University

Business / Industry Activities

Chair, Customer Service Committee for Association of Edison Illuminating Companies (AEIC); Advisory Board, J.D. Power (Electric Utility Industry); Advisory Board, CS Week; Advisory Board, Utility Analytics Institute

Customer Care O&M Expense Levels
($s)

Total NSP Electric	Historic Actuals						
Cost Element	2016 Actuals	2017 Actual	2018 Actual	2019 July Forecast	2020 Test Year	2021 Plan Year	2022 Plan Year
Labor	12,497,638	11,826,822	11,215,202	11,474,408	11,686,272	11,947,574	12,119,029
AMI Saving				(4,369)	(94,650)	(785,622)	(3,096,719)
Contract Labor	106,838	65,191	39,784	76,312	53,680	53,680	53,680
Outside Services	20,546,425	20,884,143	21,298,276	21,588,673	21,888,291	21,917,672	18,475,447
Employee Expenses	368,247	367,719	331,113	331,843	386,842	386,842	359,157
O&M Credits	(1,161,082)	(1,058,737)	(978,953)	(1,035,645)	(1,132,772)	(1,132,772)	
Postage	4,471,415	4,072,063	3,872,032	4,188,896	4,457,085	4,217,998	4,066,988
Net Other*	464,303	603,899	627,601	491,443	342,455	341,318	340,347
Grand Total	37,293,784	36,761,100	36,405,055	37,111,561	37,587,202	36,946,690	32,317,929

* All other accounts with less than $250,000 annually average for the years listed above

Total MN Electric Jurisdiction	Historic Actuals						
Cost Element	2016 Actuals	2017 Actual	2018 Actual	2019 July Forecast	2020 Plan Year	2021 Plan Year	2022 Plan Year
Labor	10,731,394	10,144,577	9,587,334	9,813,000	9,996,313	10,228,641	10,373,224
AMI Saving				(4,369)	(94,650)	(785,622)	(3,096,719)
Contract Labor	63,339	27,705	7,230	26,671	12,542	12,542	12,542
Outside Services	18,821,657	19,120,689	19,353,926	19,632,144	19,899,265	19,916,131	15,750,495
Employee Expenses	289,411	318,345	282,714	282,949	330,935	330,935	306,786
O&M Credits	(1,161,082)	(1,058,737)	(978,953)	(1,035,645)	(1,132,772)	(1,132,772)	
Postage	3,899,981	3,551,779	3,377,470	3,653,597	3,887,110	3,678,552	3,546,824
Net Other*	404,174	519,783	528,286	428,276	287,919	286,927	286,080
Grand Total	33,048,873	32,624,141	32,158,008	32,796,623	33,186,662	32,535,334	27,179,232

Customer Care O&M Expense Levels
($s)

		Total NSP Electric							Total MN Electric Jurisdiction						
Sum of YE Amt		Historic Actuals							Historic Actuals						
Director	Cost Element	2016 Actuals	2017 Actual	2018 Actual	2019 July Forecast	2020 Test Year	2021 Plan Year	2022 Plan Year	2016 Actuals	2017 Actual	2018 Actual	2019 July Forecast	2020 Test Year	2021 Plan Year	2022 Plan Year
Billing Services	Labor	2,084,349	2,049,009	1,999,450	1,936,328	2,008,167	2,059,971	2,065,482	1,818,205	1,787,377	1,744,146	1,689,084	1,751,750	1,796,939	1,801,746
	Contract Labor	9,314	7,697	8,288	30,375	12,152	12,152	12,152	8,124	6,714	7,230	26,497	10,600	10,600	10,600
	Outside Services	1,614,968	1,520,703	1,427,939	1,564,967	1,655,007	1,590,542	1,503,140	1,408,757	1,326,529	1,245,610	1,365,141	1,443,684	1,387,451	1,311,208
	Employee Expenses	21,105	25,909	21,479	21,077	19,171	19,171	19,171	18,410	22,601	18,736	18,386	16,723	16,723	16,723
	Postage	4,460,793	4,061,999	3,863,721	4,181,868	4,449,846	4,210,759	4,059,749	3,891,207	3,543,334	3,370,374	3,647,898	3,881,658	3,673,100	3,541,372
	Net Other*	50,795	62,313	34,846	41,929	71,754	71,144	70,126	44,309	54,357	30,397	36,575	62,592	62,059	61,172
Billing Services Total		8,241,323	7,727,630	7,355,724	7,776,544	8,216,096	7,963,738	7,729,820	7,189,013	6,740,912	6,416,493	6,783,581	7,167,008	6,946,872	6,742,822
Contact Center	Labor	4,413,717	4,187,099	3,868,993	3,952,824	3,935,366	3,879,920	3,875,761	3,850,142	3,652,461	3,374,973	3,448,100	3,432,871	3,384,505	3,380,877
	Outside Services	68,919	27,761	32,885	28,491	27,801	27,801	27,801	60,119	24,216	28,686	24,853	24,251	24,251	24,251
	Employee Expenses	46,263	55,220	55,698	49,448	50,029	50,029	50,029	40,355	48,169	48,586	43,134	43,641	43,641	43,641
	Postage	4,311	3,216	3,654	3,707	3,841	3,841	3,841	3,761	2,806	3,187	3,234	3,350	3,350	3,350
	Net Other*	54,985	42,003	16,914	5,515	15,645	15,118	15,164	47,964	36,640	14,754	4,811	13,648	13,187	13,227
Contact Center Total		4,588,194	4,315,300	3,978,144	4,039,985	4,032,682	3,976,708	3,972,595	4,002,341	3,764,292	3,470,186	3,524,132	3,517,761	3,468,934	3,465,347
Credit & Collections	Labor	1,685,456	1,606,373	1,518,807	1,542,816	1,571,628	1,631,724	1,678,331	1,470,245	1,401,260	1,324,875	1,345,818	1,370,951	1,423,374	1,464,030
	Outside Services	623,476	655,494	664,291	511,549	566,111	566,111	566,111	543,866	571,796	579,470	446,231	493,826	493,826	493,826
	Employee Expenses	33,336	43,930	47,678	44,085	42,840	42,840	42,840	29,079	38,320	41,590	38,456	37,370	37,370	37,370
	Postage	4,081	4,866	2,504	1,262	1,336	1,336	1,336	3,560	4,244	2,185	1,101	1,166	1,166	1,165
	Net Other*	61,181	62,569	38,738	41,467	29,768	29,768	29,768	53,369	54,580	33,791	36,172	25,967	25,967	25,967
Credit & Collections Total		2,407,530	2,373,232	2,272,018	2,141,178	2,211,683	2,271,780	2,318,387	2,100,120	2,070,201	1,981,911	1,867,777	1,929,280	1,981,703	2,022,359
Meter Reading	Labor	2,818,344	2,532,964	2,443,654	2,624,205	2,707,932	2,869,076	2,945,109	2,288,020	2,037,424	1,935,799	2,092,853	2,164,391	2,309,349	2,370,695
	AMI Saving				(4,369)	(94,650)	(785,622)	(3,096,719)				(4,369)	(94,650)	(785,622)	(3,096,719)
	Contract Labor	97,525	57,396	31,495	45,738	41,130	41,130	41,130	55,214	20,906	-	-	1,594	1,594	1,594
	Outside Services	18,146,006	18,567,081	19,035,730	19,336,850	19,503,219	19,596,243	16,240,587	16,727,740	17,099,485	17,380,278	17,667,849	17,818,735	17,891,118	13,800,997
	Employee Expenses	233,247	207,700	171,328	172,031	224,342	224,341	196,656	171,635	178,759	143,331	143,544	189,184	189,184	165,034
	Postage	1,876	1,827	2,081	1,520	1,706	1,706	1,706	1,144	1,259	1,662	894	626	626	626
	O&M Credits	(1,161,082)	(1,058,737)	(978,953)	(1,035,645)	(1,132,772)	(1,132,772)		(1,161,082)	(1,058,737)	(978,953)	(1,035,645)	(1,132,772)	(1,132,772)	
	Net Other*	192,848	342,907	467,245	326,985	142,341	142,342	142,342	167,380	292,116	388,405	284,818	113,357	113,358	113,358
Meter Reading Total		20,328,764	20,651,138	21,172,580	21,467,315	21,393,247	20,956,443	16,470,812	18,250,051	18,571,212	18,870,522	19,149,944	19,060,465	18,586,834	13,355,585
VP & Customer Care Operations	Labor	1,495,773	1,451,376	1,384,298	1,418,234	1,463,179	1,506,885	1,554,346	1,304,782	1,266,055	1,207,541	1,237,144	1,276,350	1,314,475	1,355,876
	Contract Labor		98	-	199	399	399	399		85	-	174	348	348	348
	Outside Services	93,057	113,105	137,431	146,817	136,153	136,974	137,808	81,175	98,663	119,883	128,070	118,768	119,484	120,212
	Employee Expenses	34,296	34,959	34,930	45,202	50,461	50,462	50,462	29,931	30,495	30,470	39,430	44,018	44,018	44,018
	Postage	354	156	72	540	356	356	356	309	136	63	471	310	310	310
	Net Other*	104,495	94,106	69,859	75,546	82,947	82,946	82,946	91,152	82,090	60,939	65,900	72,355	72,355	72,355
VP & Customer Care Operations Total		1,727,974	1,693,800	1,626,590	1,686,538	1,733,494	1,778,021	1,826,316	1,507,348	1,477,524	1,418,896	1,471,189	1,512,149	1,550,991	1,593,119
Grand Total		37,293,784	36,761,100	36,405,055	37,111,561	37,587,202	36,946,690	32,317,929	33,048,873	32,624,141	32,158,008	32,796,623	33,186,662	32,535,334	27,179,232

* All accounts included in the "Net Other" category from Page 1

Measuring the Voice of our Customers with J.D. Power Satisfaction

Xcel Energy participates in the J.D. Power residential study to capture the voice of our customers across a broad spectrum of satisfaction categories.

J.D. Power is an independent global research firm that provides services to several industries, including the energy industry. As it pertains to the energy industry, J.D. Power performs ongoing benchmarking studies that assess how utilities have performed compared to one another in several customer service-related categories.

The Company does not retain J.D. Power to perform its surveys; rather, J.D. Power performs the surveys and makes the results available annually via subscription. The Company subscribes to the J.D. Power survey because the Company finds value in understanding the issues that are important to customers nationally and regionally, as well as how its customers rate its service performance compared to other utilities.

The J.D. Power study uses a ratings scale of 1 to 10, where 10 represents very satisfied and 1 represents very dissatisfied. J.D. Power uses an index to combine customer scores to create a single overall satisfaction score, which is on a 1,000 point scale.

J.D. Power has identified through ongoing analysis the top drivers of customer satisfaction. Utilities use this information to understand and prioritize activities to improve satisfaction. J.D. Power results are shared with business areas so they have timely information from which to make any necessary changes to better serve customers.

The table below summarizes our performance over the past five years in these areas. It also includes some examples of what J.D. Power collects regarding each of these categories.

J.D. Power Utility Residential Study Results: Xcel Energy Midwest Index score on 1,000 point scale as calculated by J.D. Power

Factor	2014	2015	2016	2017	2018
Price (i.e., total monthly cost, fairness, options, easy to understand, help in managing usage)	574	596	625	663	664
Power Quality & Reliability (i.e., quality power, avoiding outages, reliable during extreme weather, prompt restoration, outage communications)	717	718	743	781	780
Billing & Payment (i.e., usefulness of info, ease of understanding bill, amount of time to pay, offering variety of bill pay options)	726	728	749	781	779
Corporate Citizenship (i.e., community involvement, environmental stewardship, energy efficiency focused, develops future energy plans)	604	622	636	653	674
Communications (i.e., keeping costs low, energy efficiency messaging, safety, communicating changes, messages that get attention)	605	629	647	668	681
Customer Service (i.e., phone ease of use, rep clarity, promptness, courteousness, knowledge, sincerity, timeliness, online appearance, clarity, ease, timeliness)	728	737	762	788	792

JD Power reports satisfaction performance based on region by utility. Therefore, NSP-Minnesota and NSP-Wisconsin are combined into "Xcel Energy Midwest" by JD Power. To be consistent with all data in this section, we are reporting Xcel Energy Midwest performance.

As mentioned, the J.D. Power study measures customer satisfaction with utilities nationally, which includes over 130 utilities as of 2018. The table below provides a five-year history over our overall satisfaction index score and how that compares to the average score in our region as well as our quartile performance in the Midwest.

J.D. Power Utility Residential Customer Satisfaction Study
Regional Benchmarks

J.D. Power Study	Indicators	2014	2015	2016	2017	2018
Residential Electricity Customers	Xcel Energy Midwest Large Segment Quartile Achievement	2	2	1	1	2
	Xcel Energy Midwest Customer Satisfaction Index Score	658	670	692	723	727
	Midwest Large Segment - Average Index Score	644	661	678	717	726

Northern States Power Write-Off Policy

Once an account is finaled and has aged **139** working days past the final bill due date, the following events take place:

- Debtors with a balance of $1,000 or less go directly to write-off in Daily Processing in the Customer Resource System (CRS).

- Accounts with a balance of over $1,000 need to be worked manually.
  - A '*Pending Write-offs'* report is created for all debtors that are ready to be written off but have not been written off by CRS. This report is reviewed by Revenue Assurance to search for an active account for the same debtor to transfer the past due amount to, and/or to collect money if possible. If they are unable to find a current account for the same debtor, the past due amount is manually written-off. (Refer to *Write-off Requests, Manual Approval Procedures* for process steps.)

- For debt meeting the criteria above for manual processing (**139** working days past the final bill due date over $1,000) items will be processed for up to 30 days from the Pending Write-Off report with one of the following actions taking place by day 30 of the item being in the queue:

  1) Transfer balance to new using account
  2) Collection of debt
  3) Write off

- Enforcement of the 30-day processing will be managed with a report to identify and track all accounts aged later than the **139** date and ensure any uncollectible account is written off by the cutoff date, unless there is evidence of collectibility to the contrary (collections incoming or a legitimate promise to pay in place). Changes will be minimized as much as possible, and any changes will require the approval of the Vice President of Customer Care.

2020 Test Year Commodity Bad Debt Expense Calculation
Average 24 months of July 16-June 18 actual Bad Debt % of Revenue

Year	Month	Commodity Bad Debt Expense	Billed Commodity Revenue	Bad Debt % of Revenue
2016	July	$1,320,311.96	$347,998,735.25	
2016	August	$1,522,909.11	$404,159,759.77	
2016	September	$1,137,127.10	$347,652,055.37	
2016	October	$1,294,335.79	$303,959,352.92	
2016	November	$1,275,570.32	$278,410,464.18	
2016	December	$1,537,014.41	$328,563,718.16	
2017	January	$1,669,444.21	$411,893,504.83	
2017	February	$972,002.44	$329,669,290.00	
2017	March	$990,315.05	$354,491,955.36	
2017	April	$226,044.53	$281,767,073.00	
2017	May	$728,063.64	$296,300,558.50	
2017	June	$1,750,254.20	$331,769,752.00	
2017	July	$1,493,746.70	$359,513,184.67	
2017	August	$1,353,654.21	$378,323,265.45	
2017	September	$1,071,506.97	$320,282,407.14	
2017	October	$1,110,612.95	$327,236,077.12	
2017	November	$1,086,345.47	$295,649,513.49	
2017	December	$1,871,402.20	$331,337,071.67	
2018	January	$1,691,919.85	$433,089,038.07	
2018	February	$1,388,287.35	$359,968,986.23	
2018	March	$1,168,074.73	$376,092,206.15	
2018	April	$2,855.31	$314,829,742.87	
2018	May	$694,449.78	$305,525,169.39	
2018	June	$1,309,578.12	$344,226,177.71	
Total		$28,665,826.40	$8,162,709,059.30	
Average		$1,194,409.43	$340,112,877.47	0.35%

Northern States Power Company
Commodity Bad Debt Expense Calculation
Fiscal Years 2020, 2021, and 2022
$1000s

Docket No. E002/GR-19-564
Exhibit___(CCC-1), Schedule 6

NSP MN Electric Retail Revenue	NSP MNCo Electric Retail Rev 2020	NSP MNCo Electric Retail Rev 2021	NSP MNCo Electric Retail Rev 2022
Billed Revenues			
Residential	$1,307,676	$1,349,402	$1,378,093
Residential w/space heat	$81,881	$86,310	$88,872
Commercial & Industrial - Small	$1,585,848	$1,647,285	$1,687,310
Commercial & Industrial - Large	$741,165	$770,996	$792,380
Total NSP MNCo Electric Billed Revenues	$3,716,569	$3,853,993	$3,946,655
Public Street & Highway Light (PS&HL)	$27,839	$28,763	$29,394
Other Sales to Public Authorities (OSPA)	$9,909	$10,304	$10,556
Interdepartmental	$728	$762	$786
Total NSP MNCo Electric Retail Revenues	$3,755,045	$3,893,821	$3,987,392

NSP MN Gas Retail Revenue	NSP MNCo Gas Retail Rev 2020	NSP MNCo Gas Retail Rev 2021	NSP MNCo Gas Retail Rev 2022
Billed Revenues			
Residential	$277,973	$285,420	$291,569
Small Commercial & Industrial	$60,601	$61,231	$64,818
Large Commercial & Industrial	$106,221	$110,678	$113,229
Interruptible	$45,500	$48,308	$49,914
Total NSP MNCo Gas Billed Revenues	$490,295	$505,636	$519,530
Generation	$227	$227	$218
Interdepartmental	$48	$50	$50
Transport Firm	$3,794	$6,465	$7,485
Total NSP MNCo Gas Retail Revenues	$494,364	$512,378	$527,283

Billed Revenues			
Total NSP MNCo Electric Billed Revenues	$3,716,569	$3,853,993	$3,946,655
Total NSP MNCo Gas Billed Revenues	$490,295	$505,636	$519,530
Total NSP MNCo Electric and Gas Billed Revenues	$4,206,864	$4,359,629	$4,466,185
Commodity Bad Debt Calculation			
NSP MNCo Electric and Gas Billed Revenue	$4,206,864	$4,359,629	$4,466,185
Commodity Bad Debt Ratio	0.35%	0.35%	0.35%
NSP MNCo Commodity Bad Debt	**$14,669**	**$15,070**	**$15,439**

Commodity Bad Debt Allocation to Jurisdiction

	48-month historic retail revenue average	2020 Commodity Bad Debt Expense	2021 Commodity Bad Debt Expense	2021 Commodity Bad Debt Expense
MN Electric	76.8%	$11,259	$11,568	$11,850
ND Electric	5.1%	$753	$774	$793
SD Electric	5.2%	$760	$781	$800
MN Gas	11.4%	$1,673	$1,719	$1,761
ND Gas	1.5%	$223	$229	$234
Total	100.0%	$14,669	$15,070	$15,439

Commodity Only Bad Debt Expense

Actual Bad Debt Gross Write-offs	2016 Actual	2017 Actual	2018 Actual	2019 YE July Forecast	2020 Test year	2021 Plan year	2022 Plan year
Total Company NSP MN (MN, ND & SD)	$ 18,836,639	$ 16,744,412	$ 17,040,397				
Total Company NSP MN Electric (MN, ND & SD)	$ 16,014,966	$ 14,310,607	$ 14,651,519				
MN Jurisdiction Electric (MN only)	$ 14,183,608	$ 12,501,377	$ 12,780,038				

Gross Recoveries of Bad Debt & Other	2016 Actual	2017 Actual	2018 Actual	2019 YE July Forecast	2020 Test year	2021 Plan year	2022 Plan year
Total Company NSP MN (MN, ND & SD)	$ (4,158,267)	$ (3,753,537)	$ (3,811,319)				
Total Company NSP MN Electric (MN, ND & SD)	$ (3,535,371)	$ (3,207,960)	$ (3,277,013)				
MN Jurisdiction Electric (MN only)	$ (3,131,091)	$ (2,802,391)	$ (2,858,431)				

Reserve for Bad Debt	2016 Actual	2017 Actual	2018 Actual	2019 YE July Forecast	2020 Test year	2021 Plan year	2022 Plan year
Total Company NSP MN (MN, ND & SD)	$ (780,798)	$ 1,332,518	$ 2,110,341				
Total Company NSP MN Electric (MN, ND & SD)	$ (663,836)	$ 1,138,836	$ 1,814,494				
MN Jurisdiction Electric (MN only)	**$ (587,925)**	**$ 994,858**	**$ 1,582,723**				

Total Bad Debt Expense	2016 Actual	2017 Actual	2018 Actual	2019 YE July Forecast	2020 Test year	2021 Plan year	2022 Plan year
Total Company NSP MN (MN, ND & SD)	$ 13,897,574	$ 14,323,393	$ 15,339,419	$ 13,341,991	$ 14,668,506	$ 15,070,380	$ 15,438,721
Total Company NSP MN Electric (MN, ND & SD)	$ 11,815,758	$ 12,241,484	$ 13,188,999	$ 11,593,435	$ 12,807,645	$ 13,158,536	$ 13,480,149
MN Jurisdiction Electric (MN only)	$ 10,464,592	$ 10,693,844	$ 11,504,330	$ 10,240,863	$ 11,259,050	$ 11,567,515	$ 11,850,241

Billed Commodity Revenue	2016 Actual	2017 Actual	2018 Actual	2019 YE July Forecast	2020 Test year	2021 Plan year	2022 Plan year
Total Company NSP MN (MN, ND & SD)	$ 3,946,773,059	$ 4,018,233,653	$ 4,309,029,202	$ 4,184,357,068	$ 4,206,863,920	$ 4,359,629,356	$ 4,466,184,730

Bad Debt Expense / Commodity Revenue	2016 Actual	2017 Actual	2018 Actual	2019 YE July Forecast	2020 Test year	2021 Plan year	2022 Plan year
Total Company NSP MN (MN, ND & SD)	0.35%	0.36%	0.36%	**0.32%**	**0.35%**	**0.35%**	**0.35%**

NSP MN Commodity Bad Debt Jurisdictional Allocators	2016 Actual	2017 Actual	2018 Actual	2019 YE July Forecast	2020 Test year	2021 Plan year	2022 Plan year
North Dakota Electric	**5.1%**	**5.5%**	**5.5%**	**5.1%**	**5.1%**	**5.1%**	**5.1%**
North Dakota Gas	**1.7%**	**1.6%**	**1.5%**	**1.5%**	**1.5%**	**1.5%**	**1.5%**
Minnesota Electric	**75.3%**	**74.7%**	**75.0%**	**76.8%**	**76.8%**	**76.8%**	**76.8%**
Minnesota Gas	**13.0%**	**12.9%**	**12.5%**	**11.4%**	**11.4%**	**11.4%**	**11.4%**
South Dakota Electric	**4.9%**	**5.4%**	**5.5%**	**5.2%**	**5.2%**	**5.2%**	**5.2%**
Total	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**

Non-Commodity Non-Energy Bad Debt Information
(Amounts in $'s)

	2016 Actual		2017 Actual		2018 Actual		2019 July Forecast		2020 Test Year		2021 Plan Year		2022 Plan Year	
	Total Electric Col 1	Mn Jurisdiction Col 2	Total Electric Col 1	Mn Jurisdiction Col 2	Total Electric Col 1	Mn Jurisdiction Col 2	Total Electric Col 3	Mn Jurisdiction Col 4	Total Electric Col 3	Mn Jurisdiction Col 4	Total Electric Col 3	Mn Jurisdiction Col 4	Total Electric Col 6	Mn Jurisdiction Col 7
Customer Care Non-Commodity (1)	97,793	85,697	94,378	82,350	88,628	77,326	84,676	74,641	95,167	83,889	95,167	83,889	95,167	83,889
Distribution Operations (2)	602,032	602,032	676,078	676,078	440,831	435,710	189,453	193,123	149,900	149,900	149,900	149,900	149,900	149,900
Transmission Filed Operations (3)	(1,000)	(882)	-	-	-	-	-	-	-	-	-	-	-	-
Corporate Giving (4)	78	78	6	6	-	-	-	-	-	-	-	-	-	-
	698,903	686,925	770,463	758,435	529,458	513,036	274,128	267,764	245,067	233,789	245,067	233,789	245,067	233,789

(1) Miscellaneous charges such as returned check and connection-related fees

(2) Distribution Contributions In Aid Of Construction, and charges for requests made by customers for non-standard equipment or set-up; claims against third parties that damage the Company's electric and gas facilities

(3) Adjustment for MN Dept of Transportation Bad Debt Provisio

(4) Minnesota city requested facilities surcharg

(904)
Uncollectible Accounts per Retail Customer

	Mean	NSPM
2008	$ 14.50	$ 13.95
2009	$ 13.66	$ 10.52
2010	$ 12.98	$ 8.49
2011	$ 12.24	$ 9.04
2012	$ 11.44	$ 6.33
2013	$ 12.36	$ 7.96
2014	$ 13.35	$ 9.97
2015	$ 12.90	$ 8.33
2016	$ 12.70	$ 8.61
2017	$ 10.11	$ 8.87
2018	$ 11.74	$ 9.28

(901-905 less 904)
Customer Care Accts Exp per Retail Customer

	Mean	NSPM
2008	$ 38.33	$ 34.11
2009	$ 38.62	$ 34.09
2010	$ 39.08	$ 34.58
2011	$ 39.34	$ 33.29
2012	$ 38.26	$ 31.82
2013	$ 37.75	$ 31.02
2014	$ 38.06	$ 30.64
2015	$ 38.86	$ 30.06
2016	$ 37.92	$ 29.90
2017	$ 38.07	$ 28.91
2018	$ 37.35	$ 28.45

(902)
Meter Reading Exp per Retail Customer

	Mean	NSPM
2008	$ 8.16	$ 15.15
2009	$ 8.36	$ 14.90
2010	$ 8.14	$ 15.41
2011	$ 7.93	$ 14.18
2012	$ 7.37	$ 12.95
2013	$ 6.83	$ 12.96
2014	$ 6.51	$ 13.00
2015	$ 6.66	$ 13.23
2016	$ 6.35	$ 13.42
2017	$ 6.11	$ 13.48
2018	$ 5.84	$ 14.36

(903)
Customer Records & Collection Exp per Retail Customer

	Mean	NSPM
2008	$ 26.98	$ 18.68
2009	$ 27.05	$ 18.94
2010	$ 28.12	$ 19.00
2011	$ 28.26	$ 18.97
2012	$ 27.80	$ 18.73
2013	$ 27.68	$ 17.93
2014	$ 28.31	$ 17.54
2015	$ 28.95	$ 16.75
2016	$ 28.57	$ 16.39
2017	$ 28.74	$ 15.35
2018	$ 28.69	$ 14.04

(901 - 905)
Total Customer Accounts Expense per Retail Customer

	Mean	NSPM
2008	$ 52.82	$ 48.06
2009	$ 52.39	$ 44.61
2010	$ 52.22	$ 43.07
2011	$ 51.57	$ 42.33
2012	$ 49.70	$ 38.15
2013	$ 50.11	$ 38.98
2014	$ 51.41	$ 40.61
2015	$ 51.76	$ 38.39
2016	$ 50.62	$ 38.50
2017	$ 48.18	$ 37.78
2018	$ 49.08	$ 37.73

Xcel Energy	Company Name	(904) Uncollectible Accounts per Retail Customer	(901-905 less 904) Customer Care Accts Exp per Retail Customer	(902) Meter Reading Exp per Retail Customer	(903) Customer Records & Collection Exp per Retail Customer	(901-905) Total Customer Accounts Expense per Retail Customer	Customer Accounts Supervision ($000)	Customer Accounts Meter Reading ($000)	Customer Accts Customer Records & Collection ($000)	Customer Accounts Uncollectible Accounts ($000)	Customer Accounts: Miscellaneous ($000)	Total Customer Accounts Expense ($000)	Customer Svc & Info: Supervision ($000)	Customer Svc & Info: Customer Assist ($000)	Customer Svc & Info: Info & Instructional ($000)	Customer Service & Info: Misc ($000)	Total Customer Svc & Informational Expense ($000)	Total Retail Electric Customers, Total (actual)
	Kansas City Power & Light Company	0.00	30.99	8.07	21.99	30.99	468	4,110	11,198	0	5	15,780	1	3,522	1,035	28	4,586	509,272
	Kingsport Power Company	0.00	38.84	4.37	31.37	38.84	145	205	1,473	0	0	1,824	33	37	54	0	124	46,961
	Public Service Company of Oklahoma	0.07	43.96	9.67	32.94	44.03	745	5,085	17,318	36	-36	23,149	962	3,587	409	2	4,960	525,801
	Kentucky Power Company	0.21	41.83	5.66	33.86	42.04	401	994	5,948	37	4	7,385	223	1,182	211	54	1,670	175,646
	Indiana Michigan Power Company	0.78	35.80	5.75	27.00	36.58	1,632	3,352	15,735	457	143	21,318	1,135	1,500	559	7	3,201	582,769
	MDU Resources Group, Inc.	1.68	30.02	7.54	16.98	31.70	341	913	2,057	204	325	3,840	51	137	35	3	226	121,124
	ALLETE (Minnesota Power)	2.13	39.36	4.01	35.34	41.48	0	568	5,001	301	0	5,871	0	9,160	0	128	9,288	141,530
	Cheyenne Light, Fuel and Power Company	2.80	20.50	6.15	11.12	23.30	63	244	441	111	64	924	257	197	4	0	457	39,663
	San Diego Gas & Electric Co.	3.37	36.06	8.17	27.83	39.43	80	11,141	37,925	4,590	3	53,738	146	158,519	68	1,633	160,367	1,362,846
	Oklahoma Gas and Electric Company	3.84	32.96	11.07	20.51	36.80	577	8,487	15,729	2,944	481	28,218	216	6,061	1,376	498	8,151	766,886
	Black Hills Colorado Electric Utility Company, LP	3.96	11.50	4.29	6.04	15.46	72	401	565	371	38	1,447	35	124	7	1	166	93,581
	Louisville Gas and Electric Company	4.51	19.13	5.08	11.54	23.65	668	2,035	4,626	1,809	337	9,475	135	1,090	115	1,329	2,669	400,699
	Monongahela Power Company	5.16	23.72	7.69	13.17	28.88		2,932	5,020	1,967	0	11,009	0	1,147	9	241	1,397	381,193
	Arizona Public Service Company	5.38	63.22	10.63	50.23	68.60	2,171	11,710	55,349	5,924	435	75,589	688	8,911	1,240	1,803	12,642	1,101,905
	Avista Corporation	5.47	29.64	6.56	21.26	35.11	491	2,313	7,491	1,928	147	12,370	0	16,553	113	145	16,811	352,352
	Southern California Edison Co.	5.90	36.77	8.92	21.44	42.67	14,169	43,362	104,189	28,681	16,993	207,394	41,908	417,978	28,666	42,516	531,068	4,860,625
	Jersey Central Power & Light Company	6.02	29.39	11.51	17.48	35.41	69	12,546	19,051	6,561	365	38,592	853	89,208	44	8,177	98,281	1,089,980
	Duke Energy Carolinas, LLC	6.20	23.19	2.64	18.82	29.39	1,321	6,247	44,487	14,664	2,783	69,502	0	4,348	0	15,831	20,179	2,364,417
	Carolina Power & Light Company	6.58	24.64	4.08	17.66	31.21	1,038	5,905	25,568	9,517	3,148	45,175	469	6,556	1,770	2,206	11,001	1,447,424
	Northwestern Wisconsin Electric Company	6.66	39.73	16.72	22.63	46.39	5	221	299	88	0	613	0	0	21	223	244	13,214
	Florida Power & Light Company	7.03	26.10	5.56	19.61	33.13	4,199	25,096	88,426	31,700	0	149,421	14,664	73,778	5,746	8,306	102,495	4,509,739
	Kansas Gas and Electric Company	7.07	26.17	7.40	16.09	33.24	802	2,317	5,036	2,212	39	10,406	348	1,687	72	2	2,109	313,060
	Westar Energy (KPL)	7.20	26.88	6.90	17.14	34.08	1,027	2,518	6,252	2,626	9	12,431	473	1,766	202	3	2,443	364,752
	Potomac Edison Company	7.26	19.68	6.36	10.48	26.94	1,366	3,054	5,031	3,484	0	12,935	0	1,560	12	743	2,314	480,214
	Kentucky Utilities Company	7.31	34.58	7.01	23.33	41.89	1,940	3,761	12,516	3,920	335	22,472	252	2,726	69	1,871	4,918	536,441
	South Carolina Electric & Gas Co.	7.36	65.10	8.51	51.94	72.46	1,363	5,503	33,579	4,757	1,644	46,845	687	3,393	24	46	4,150	646,519
	Tucson Electric Power Company	7.42	40.82	8.00	32.82	48.24	0	3,189	13,082	2,957	0	19,228	0	2,870	730	14	3,614	398,574
	KCP&L Greater Missouri Operations Company	7.48	30.26	9.88	18.45	37.74	777	3,989	7,452	3,021	2	15,241	161	217	179	28	585	403,879
	Appalachian Power Company	7.56	38.11	5.58	30.52	45.66	1,923	5,345	29,231	7,238	2	43,740	928	2,482	768	1	4,178	957,875
	Idaho Power Co.	7.60	36.88	11.87	24.30	44.48	342	5,753	11,774	3,682	0	21,551	299	27,675	0	860	28,834	484,535
	Wisconsin Power and Light Company	7.65	23.55	11.95	11.05	31.20	222	5,426	5,015	3,473	25	14,160	49	34,355	189	119	34,712	453,880
	Entergy Texas, Inc.	7.74	38.39	9.31	28.22	46.13	304	3,695	11,202	3,073	34	18,309	340	4,624	249	1,634	6,847	396,885
	Florida Power Corporation	8.27	22.21	1.72	17.89	30.47	2,447	2,814	29,316	13,549	1,818	49,943	20	63,649	7,682	143	71,494	1,638,911
	El Paso Electric Company	8.37	31.33	6.18	23.02	39.70	236	2,230	8,312	3,022	535	14,334	0	369	103	0	472	361,034
	Rockland Electric Company	8.44	65.95	11.31	34.35	74.39	3	818	2,484	610	1,464	5,379	153	7,601	0	76	7,829	72,310
	Public Service Company of New Mexico	8.45	23.20	2.28	19.55	31.65	674	1,128	9,683	4,186	7	15,678	16	1,497	562	40	2,115	495,284
	Ohio Edison Company	8.79	29.38	8.85	19.91	38.16	61	9,211	20,714	9,142	580	39,708	0	21	0	4,777	4,798	1,040,518
	Virginia Electric and Power Company	8.84	18.83	4.53	13.82	27.67	1,127	10,820	32,985	21,100	0	66,032	0	9,384	4,672	0	14,055	2,386,208
	Gulf Power Company	8.97	41.98	5.87	32.27	50.95	374	2,522	13,854	3,850	1,272	21,873	3,067	20,862	1,539	247	25,715	429,302
	Cleveland Electric Illuminating Company	9.39	27.41	7.44	19.21	36.80	49	5,620	14,516	7,100	531	27,816	0	16	0	3,486	3,502	755,807
	Indianapolis Power & Light Company	9.44	31.76	12.18	17.70	41.20	721	5,705	8,285	4,420	158	19,289	0	1,621	61	19	1,701	468,203
	Entergy Louisiana, LLC	9.57	44.67	8.67	34.88	54.24	633	5,722	23,016	6,314	101	35,786	532	462	1,016	1,731	3,741	659,772
	Black Hills Power, Inc.	9.66	31.30	8.49	12.89	40.96	25	560	850	637	629	2,701	125	761	7	87	981	65,936
	Pike County Light & Power Company	9.69	65.70	7.76	39.64	75.40	0	36	184	45	85	350	0	0	21	21	42	4,642
	Entergy Arkansas, Inc.	9.85	47.48	9.44	37.00	57.33	614	6,505	25,489	6,785	102	39,496	499	2,314	317	1,830	4,960	688,970
	Pacific Gas and Electric Company	9.93	41.16	9.65	31.48	51.09	0	50,958	166,180	52,428	148	269,714	0	729,450	0	0	729,450	5,278,736
	Union Electric Company	9.98	35.94	14.62	19.62	45.92	1,723	17,483	23,469	11,942	308	54,926	45	2,998	5,212	2,470	10,725	1,196,119
	Portland General Electric Company	10.17	62.78	7.23	50.35	72.94	0	5,867	40,848	8,248	4,217	59,180	0	6,884	2,596	0	9,480	811,315
	Northern Indiana Public Service Co.	10.18	30.16	6.36	20.01	40.34	1,570	2,902	9,130	4,647	159	18,407	0	0	8	498	506	456,302
	Tampa Electric Company	10.23	35.31	5.31	21.34	45.54	5,777	3,543	14,241	6,828	0	30,388	0	16,991	892	0	17,884	667,266
	Upper Peninsula Power Company	10.38	55.20	15.13	36.49	65.58	35	784	1,891	538	151	3,399	1	362	37	16	417	51,826
X	Public Service Company of Colorado	10.62	19.85	3.93	15.74	30.46	229	5,339	21,373	14,419	11	41,370	0	35,017	1,289	0	36,306	1,358,033
	Pennsylvania Electric Company	10.82	30.81	12.43	17.98	41.63	36	7,322	10,592	6,372	195	24,518	939	22,019	7	4,293	27,258	589,017
	Alabama Power Company	11.35	63.39	10.91	44.06	74.74	12,084	15,656	63,243	16,290	0	107,273	5,495	26,772	2,568	7	34,841	1,435,370
	Unitil Energy Systems, Inc.	11.35	34.63	2.08	32.52	45.98	2	158	2,470	862	0	3,492	2	1,600	4	0	1,606	75,948
	Southern Indiana Gas and Electric Company, Inc.	11.36	33.68	9.25	21.75	45.04	255	1,353	3,183	1,662	138	6,591	0	136	38	474	648	146,339
	Public Service Company of New Hampshire	11.49	36.63	11.16	25.37	48.12	0	5,501	12,502	5,661	51	23,715	0	17,572	85	30	17,687	492,823
	Consumers Energy Company	11.49	24.89	6.15	15.78	36.38	4,922	11,092	28,476	20,733	409	65,632	241	30,695	177	0	31,113	1,804,232
	Wisconsin Public Service Corporation	11.56	25.58	-0.03	18.83	37.14	1,235	-15	8,166	5,011	1,705	16,101	975	17,961	848	380	20,164	433,574
X	Southwestern Public Service Company	11.86	34.40	11.23	22.96	46.26	78	4,492	9,185	4,746	5	18,506	0	11,643	424	0	12,067	400,025
	Mississippi Power Company	12.02	73.65	10.95	47.03	85.67	1,331	2,037	8,746	2,235	1,582	15,931	1,197	4,405	365	377	6,344	185,949
	Empire District Electric Company	12.16	41.05	10.48	25.72	53.21	540	1,757	4,311	2,039	273	8,920	328	862	152	7	1,349	167,643
	Wheeling Power Co	12.17	35.44	9.39	24.53	47.61	63	388	1,014	503	0	1,968	57	154	51	0	262	41,334
	Interstate Power and Light Company	12.42	25.64	12.07	13.00	38.06	270	6,358	6,845	6,541	30	20,045	60	31,375	236	478	32,148	526,600
	Hawaiian Electric Company, Inc.	12.50	41.43	9.20	27.70	53.92	1,333	2,707	8,152	3,678	0	15,871	0	0	480	31,488	31,968	294,327
X	Northern States Power Company - WI	12.97	28.87	11.68	15.53	41.84	48	3,031	4,032	3,366	383	10,860	0	8,878	221	0	9,098	259,571
	Georgia Power Company	13.30	55.28	12.72	37.80	68.58	10,338	29,846	88,719	31,219	824	160,945	0	41,323	858	2,719	44,899	2,346,766
	UNS Electric, Inc.	13.35	46.91	10.13	33.50	60.25	255	912	3,015	1,201	39	5,422	0	546	192	31	769	89,987
	Toledo Edison Company	13.36	30.55	7.68	22.10	43.91	27	2,402	6,909	4,176	213	13,727	0	9	0	3,124	3,132	312,642
	Cleco Power LLC	13.87	49.15	12.60	29.76	63.02	1,624	3,471	8,200	3,821	247	17,363	0	3,159	300	1,315	4,773	275,524
X	Northern States Power Company - MN	13.95	34.11	15.15	18.68	48.06	256	20,380	25,131	18,758	112	64,638	0	59,685	1,293	0	60,978	1,344,989
	Orange and Rockland Utilities, Inc.	14.46	50.96	12.58	38.08	65.42	1	2,798	8,466	3,214	66	14,545	0	0	593	11,079	11,673	222,340
	Superior Water, Light and Power Company	14.66	21.71	6.51	13.90	36.37	5	95	203	214	14	531	0	156	8	365	528	14,601
	Entergy Mississippi, Inc.	14.86	53.06	9.03	42.78	67.92	473	3,916	18,554	6,444	70	29,457	262	1,571	349	1,496	3,678	433,720
	Entergy Gulf States Louisiana, L.L.C.	15.06	45.71	9.19	35.46	60.77	342	3,440	13,274	5,637	58	22,752	390	384	823	956	2,553	374,390
	Atlantic City Electric Company	15.10	76.38	7.35	68.59	91.49	0	4,008	37,384	8,231	238	49,861	20,948	1,058	102	-112	21,996	545,011
	Central Vermont Public Service Corporation	15.41	31.31	17.20	10.26	46.73	520	2,729	1,628	2,446	93	7,415	111	1,113	32	0	1,255	158,691
	West Penn Power Company	15.75	19.05	6.47	9.74	34.80	2,027	4,618	6,947	11,235	0	24,826	0	3,885	40	360	4,284	713,401
	Madison Gas and Electric Company	16.18	36.20	2.61	32.43	52.38	0	364	4,522	2,256	162	7,304	22	7,482	699	544	8,657	139,449
	Metropolitan Edison Company	16.24	30.53	11.72	18.49	46.77	43	6,415	10,122	8,893	136	25,610	748	16,188	7	5,388	22,330	547,557
	Public Service Electric and Gas Company	16.26	79.26	8.57	27.92	95.52	0	18,076	58,917	34,307	90,241	201,541	0	130,038	0	563	130,602	2,110,003
	NSTAR Electric Company	16.68	33.82	4.63	25.80	50.50	2,242	5,289	29,503	19,066	1,634	57,735	0	56,760	324	4,828	61,912	1,143,366
	Central Hudson Gas & Electric Corporation	18.07	41.80	9.54	23.51	59.87	0	2,750	6,778	5,208	2,521	17,257	0	13,106	288	1,146	14,540	288,257
	Entergy New Orleans, Inc.	18.19	53.26	9.31	43.16	71.45	89	1,282	5,945	2,506	19	9,841	242	154	193	388	976	137,733
	Commonwealth Edison Company	18.54	40.19	8.94	31.10	58.72	569	34,019	118,396	70,572	0	223,557	0	32,930	4,754	0	37,684	3,806,862
	Duke Energy Kentucky, Inc.	19.04	31.01	7.33	23.92	50.05	14	987	3,222	2,565	-46	6,742	0	162	1	837	1,001	134,703
	PPL Electric Utilities Corporation	19.76	24.38	1.55	21.70	44.14	471	2,154	30,221	27,517	1,100	61,463	0	13,423	6,355	214	19,991	1,392,441
	Nevada Power Company	19.84	31.95	5.51	25.00	51.79	1,193	4,547	20,643	16,384	0	42,766	1,087	7,264	2	0	8,353	825,721
	Consolidated Edison Company of New York, Inc.	19.99	46.15	9.23	34.96	66.14	6,040	30,093	114,033	65,210	344	215,721	0	0	239	13,667	13,906	3,261,502
	Duke Energy Indiana, Inc.	20.56	32.37	9.41	23.16	52.93	83	7,306	17,987	15,968	-233	41,111	0	1,142	15	5,812	6,969	776,647
	Hawaii Electric Light Company, Inc.	21.49	45.63	10.27	33.32	67.12	161	815	2,645	1,706	0	5,328	0	0	156	2,880	3,036	79,386
	Potomac Electric Power Company	23.48	68.68	1.69	66.99	92.16	0	1,289	51,050	17,897	0	70,236	0	748	733	-6	1,476	762,093
	Baltimore Gas and Electric Company	25.67	32.22	4.45	23.37	57.89	1,289	5,467	28,731	31,555	4,116	71,158	0	1,253	1,272	2,154	4,679	1,229,181
	Delmarva Power & Light Company	27.96	81.68	16.10	65.59	109.64	0	7,996	32,575	13,886	0	54,457	0	1,009	297	-8	1,299	496,682
	Columbus Southern Power Company	34.10	41.20	6.47	32.98	75.30	1,291	4,833	24,640	25,479	16	56,259	1,018	1,485	661	20	3,185	747,099
	Ohio Power Company	37.89	39.61	7.79	29.71	77.50	1,483	5,541	21,137	26,954	20	55,134	1,529	2,642	658	0	4,830	711,447
	DTE Electric Company	40.46	35.45	6.42	27.00	75.90	3,135	13,801	58,058	86,998	1,233	163,225	1,376	59,477	0	428	61,281	2,150,421
	Western Massachusetts Electric Company	41.66	32.78	3.28	27.37	74.44	19	674	5,623	8,559	419	15,295	0	11,642	289	2	11,933	205,463
	Connecticut Light and Power Company	42.50	31.82	2.33	27.67	74.32	131	2,809	33,308	51,168	2,060	89,476	0	135,603	788	6	136,397	1,203,921
	Fitchburg Gas and Electric Light Company	44.06	48.12	2.08	45.83	92.18	5	59	1,301	1,251	0	2,617	6	899	0	0	904	28,390

Northern States Power Company

FERC 904 Comparison
2008_Sept13

Xcel Energy

Company Name	(904) Uncollectible Accounts per Retail Customer	(901-905 less 904) Customer Care Accts Exp per Retail Customer	(902) Meter Reading Exp per Retail Customer	(903) Customer Records & Collection Exp per Retail Customer	(901-905) Total Customer Accounts Expense per Retail Customer	Customer Accounts Supervision ($000)	Customer Accounts Meter Reading ($000)	Customer Accts Customer Records & Collection ($000)	Customer Accounts Uncollectible Accounts ($000)	Customer Accounts: Miscellaneous ($000)	Total Customer Accounts Expense ($000)	Customer Svc & Info: Supervision ($000)	Customer Svc & Info: Customer Asist ($000)	Customer Svc & Info: Info & Instructional ($000)	Customer Service & Info: Misc ($000)	Total Customer Svc & Informational Expense ($000)	Total Retail Electric Customers, Total (actual)
Duke Energy Ohio, Inc.	48.29	33.82	8.43	25.66	82.11	73	5,796	17,655	33,220	-256	56,488	0	895	4	3,972	4,872	687,930
Wisconsin Electric Power Company	58.92	25.32	7.07	17.77	84.25	433	7,856	19,761	65,510	105	93,666	416	50,033	1,597	90	52,136	1,111,797
United Illuminating Company	67.69	60.53	17.12	43.39	128.22	5	5,556	14,079	21,964	0	41,604	58	32,228	0	0	32,286	324,476
PECO Energy Company	87.11	64.50	9.49	34.25	151.62	0	14,866	53,674	136,530	32,550	237,619	0	9,269	1,585	487	11,342	1,567,250
NSPM	**13.95**	**34.11**	**15.15**	**18.68**	**48.06**												

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Xcel Energy	Company Name	(904) Uncollectible Accounts per Retail Customer	(901-905 less 904) Customer Care Accts Exp per Retail Customer	(902) Meter Reading Exp per Retail Customer	(903) Customer Records & Collection Exp per Retail Customer	(901-905) Total Customer Accounts Expense per Retail Customer	Cust Accts-Meter Reading Exp ($000)	Cust Accts-Cust Rec & Coll Exp ($000)	Cust Accts-Uncollectible Accts ($000)	Cust Accts-Cust Acct Exp ($000)	Cust Service-Cust Assistance Exp ($000)	Cust Service-Cust Serv/Info Exp ($000)	Sales-Sales Exp ($000)	Ult Consumer Electric Customers
	Kansas City Power & Light Company	0.00	34.40	8.00	23.84	34.40	4,081	12,163	0	17,555	7,333	8,504	975	510,296
	Kingsport Power Company	0.00	37.21	3.30	31.00	37.21	155	1,458	0	1,750	39	136	0	47,027
	Kentucky Power Company	0.05	39.33	4.08	32.97	39.38	714	5,770	9	6,892	1,392	1,848	0	174,994
	CenterPoint Energy Houston Electric, LLC	0.26	15.24	4.97	10.25	15.50	10,476	21,632	551	32,697	26,587	28,689	0	2,109,703
	Southwestern Electric Power Company	0.35	48.23	8.55	37.63	48.58	4,037	17,777	165	22,948	1,877	6,923	0	472,380
	Public Service Company of Oklahoma	0.67	39.93	8.27	30.27	40.59	4,377	16,022	352	21,483	4,981	6,957	65	529,267
	Texas-New Mexico Power Company	1.04	16.90	7.25	8.18	17.94	1,658	1,871	238	4,102	17	195	21	228,594
	MDU Resources Group, Inc.	1.93	28.36	7.27	16.31	30.29	888	1,992	236	3,700	216	334	273	122,134
	San Diego Gas & Electric Co.	2.30	39.60	7.52	31.81	41.90	10,313	43,598	3,148	57,424	151,618	153,406	0	1,370,621
	Cheyenne Light, Fuel and Power Company	2.83	21.00	5.98	11.99	23.82	239	479	113	952	258	566	0	39,961
	NorthWestern Energy Division	3.30	23.67	5.09	18.39	26.97	2,011	7,263	1,305	10,650	4,372	5,832	213	394,869
	Oklahoma Gas and Electric Company	3.90	29.47	10.72	17.57	33.37	8,300	13,599	3,019	25,823	8,484	11,227	4,793	773,897
	Appalachian Power Company	4.61	36.00	4.52	29.57	40.61	4,342	28,381	4,429	38,982	2,375	4,291	1	959,814
	ALLETE (Minnesota Power)	5.02	38.57	3.70	34.86	43.59	532	5,014	722	6,269	10,223	10,370	264	143,813
	Public Service Company of New Mexico	5.12	18.14	4.52	12.55	23.26	2,238	6,215	2,534	11,514	1,354	1,507	6,041	495,043
	Jersey Central Power & Light Company	5.67	24.46	9.59	14.43	30.13	10,490	15,781	6,197	32,957	96,840	104,875	0	1,093,885
	Tucson Electric Power Company	5.84	41.60	8.23	33.38	47.44	3,300	13,388	2,342	19,030	7,184	8,564	0	401,107
	Southern California Edison Co.	5.90	36.75	8.95	22.03	42.65	43,626	107,371	28,751	207,919	416,881	489,391	14,702	4,874,858
	Cleco Power LLC	6.06		12.84	31.19	56.34	3,561	8,651	1,682	15,627	2,875	4,838	3,406	277,375
	UNS Electric, Inc.	6.24	43.76	10.53	29.80	50.00	949	2,685	562	4,505	1,650	2,080	0	90,100
	Union Electric Company	6.49	35.84	14.89	19.13	42.33	17,689	22,714	7,707	50,275	4,553	12,378	532	1,187,613
	Rockland Electric Company	6.54	74.16	11.39	33.90	80.70	824	2,453	473	5,839	8,243	8,485	8	72,358
	Louisville Gas and Electric Company	6.64	22.17	5.51	13.59	28.81	2,152	5,313	2,597	11,261	7,758	9,894	41	390,825
	Otter Tail Power Company	6.70	79.56	37.41	38.83	86.26	4,836	5,020	866	11,150	4,266	5,199	925	129,267
	Florida Power & Light Company	6.73	26.46	5.76	19.69	33.19	25,928	88,589	30,275	149,320	72,062	102,721	8,949	4,499,079
	Duke Energy Carolinas, LLC	7.08	27.65	2.49	24.61	34.73	5,919	58,492	16,823	82,546	941	20,523	599	2,376,853
	Wheeling Power Co	7.08	34.01	8.44	23.99	41.09	348	989	292	1,694	156	270	0	41,225
	Kentucky Utilities Company	7.18	39.65	7.36	27.58	46.82	3,980	14,908	3,879	25,312	11,302	14,343	60	540,618
	Northwestern Wisconsin Electric Co.	7.40	39.72	17.37	21.90	47.12	230	290	98	624	0	243	5	13,243
	Avista Corporation	7.71	32.89	7.39	23.22	40.60	2,624	8,244	2,736	14,416	25,449	25,664	929	355,078
X	PSCo	7.80	19.46	4.05	15.25	27.26	5,539	20,875	10,684	37,330	92,680	93,964	606	1,369,220
	Consumers Energy Company	7.97	26.46	6.15	17.81	34.44	10,993	31,834	14,252	61,549	51,925	52,326	84	1,787,254
	El Paso Electric Company	8.09	31.94	5.89	23.57	40.03	2,162	8,652	2,971	14,693	879	879	0	367,031
	Westar Energy (KPL)	8.23	29.00	7.36	18.50	37.23	2,706	6,801	3,026	13,691	1,313	1,880	1	367,696
	Wisconsin Power and Light Company	8.37	22.88	11.74	10.29	31.25	5,352	4,690	3,815	14,243	30,985	31,145	0	455,794
	Black Hills Colorado Electric Utility Company, LP	8.39	24.70	8.15	13.89	33.09	762	1,299	785	3,095	261	355	10	93,527
	Monongahela Power Company	8.43	23.21	8.66	12.48	31.64	3,323	4,787	3,234	12,139	1,282	1,387	2	383,621
	South Carolina Electric & Gas Co.	8.45	65.29	6.98	52.93	73.74	4,562	34,574	5,518	48,164	3,122	3,886	1,882	653,181
X	SPS	8.68	31.32	11.04	20.14	40.00	4,530	8,266	3,562	16,417	11,589	12,108	663	410,400
	Carolina Power & Light Company	8.71	23.97	3.94	17.28	32.67	5,761	25,264	12,727	47,764	17,106	20,238	3,647	1,461,874
	Gulf Power Company	8.76	40.85	5.99	31.12	49.61	2,567	13,327	3,753	21,243	25,632	29,773	878	428,204
	Arizona Public Service Company	9.07	57.93	9.76	45.83	67.01	10,824	50,815	10,062	74,296	22,922	25,457	8,563	1,108,781
	Indianapolis Power & Light Company	9.26	32.06	12.23	17.74	41.32	5,722	8,297	4,330	19,323	1,298	1,340	0	467,683
	Kansas Gas and Electric Company	9.30	26.34	7.87	15.32	35.64	2,487	4,841	2,937	11,258	1,246	1,712	1	315,910
	West Penn Power Company	9.73	18.90	6.91	9.88	28.63	4,937	7,063	6,954	20,470	8,307	10,018	16	714,966
	Entergy Louisiana, LLC	9.88	44.77	8.87	34.84	54.65	5,877	23,083	6,543	36,203	449	2,926	3,252	662,499
	Interstate Power and Light Company	10.02	27.34	13.82	12.69	37.36	7,269	6,674	5,270	19,651	36,674	36,866	4	526,023
	KCP&L Greater Missouri Operations Company	10.18	38.53	12.28	23.60	48.71	3,832	7,362	3,176	15,199	605	1,389	483	312,010
	Northern Indiana Public Service Co.	10.41	31.09	6.79	20.47	41.50	3,094	9,325	4,745	18,910	0	486	1,965	455,645
X	NSPM	10.52	34.09	14.90	18.94	44.61	20,371	25,889	14,379	60,986	60,023	61,586	164	1,367,070
	Pacific Gas and Electric Company	10.68	35.77	8.44	27.31	46.45	44,102	142,677	55,796	242,671	692,450	692,487	5,541	5,224,255
	Idaho Power Co.	10.79	38.65	11.06	26.83	49.45	5,399	13,096	5,269	24,139	40,755	41,870	0	488,175
	Unitil Energy Systems, Inc.	10.86	31.86	2.25	29.61	42.72	171	2,253	826	3,250	1,628	1,631	0	76,085
	Sierra Pacific Power Company	10.99	37.61	6.55	27.88	48.60	2,400	10,216	4,028	17,812	3,968	4,747	434	366,486
	Tampa Electric Company	11.32	33.49	4.72	21.46	44.81	3,147	14,306	7,548	29,876	32,272	33,018	1,123	666,747
	Portland General Electric Company	11.36	58.23	4.50	48.18	69.59	3,668	39,308	9,268	56,778	6,952	9,311	0	815,869
	Florida Power Corporation	11.41	22.22	1.58	18.23	33.64	2,574	29,711	18,606	54,833	71,189	76,889	1,253	1,630,172
	Madison Gas and Electric Company	11.68	36.22	2.70	32.51	47.90	378	4,553	1,636	6,709	7,360	8,563	186	140,054
	Entergy Texas, Inc.	11.94	38.14	9.35	27.94	50.09	3,750	11,201	4,789	20,083	9,662	11,780	1,058	400,948
	Cleveland Electric Illuminating Company	12.33	21.42	6.00	14.70	33.76	4,522	11,079	9,297	25,447	18	3,231	955	753,865
	Georgia Power Company	12.35	51.52	13.80	36.06	63.87	32,481	84,911	29,088	150,384	31,618	33,717	35,980	2,354,531
	Pennsylvania Electric Company	12.40	24.49	9.84	14.06	36.89	5,797	8,286	7,306	21,734	27,603	31,765	12	589,201
	Empire District Electric Company	12.43	44.32	10.13	29.67	56.75	1,702	4,985	2,089	9,534	860	1,324	353	167,999
	Mississippi Power Company	12.51	73.77	11.56	49.90	86.27	2,149	9,277	2,325	16,040	4,016	5,640	4,730	185,924
X	NSPW	12.52	29.86	12.22	16.00	42.38	3,189	4,177	3,267	11,062	9,396	9,719	191	261,029
	Upper Peninsula Power Company	12.86	63.49	14.00	45.79	76.35	726	2,375	667	3,960	499	542	0	51,869
	Ohio Edison Company	13.02	23.44	7.34	15.51	36.45	7,614	16,095	13,511	37,838	27	4,449	1,349	1,037,998
	Alabama Power Company	13.12	57.80	8.81	41.90	70.92	12,649	60,154	18,835	101,814	24,577	30,150	11,004	1,435,611
	Potomac Edison Company	13.49	19.24	6.69	10.07	32.73	3,235	4,870	6,523	15,824	3,925	4,223	9	483,411
	Wisconsin Public Service Corp	13.93	27.80	0.61	21.04	41.73	266	9,166	6,069	18,179	16,104	18,004	0	435,630
	Entergy Mississippi, Inc.	14.26	50.23	8.64	40.56	64.48	3,759	17,647	6,203	28,058	1,547	3,552	947	435,133
	Southern Indiana Gas and Electric Company, Inc.	14.46	35.20	10.35	21.60	49.66	1,511	3,153	2,111	7,248	97	875	1,364	145,945
	Atlantic City Electric Company	16.02	78.45	8.28	70.11	94.46	4,521	38,295	8,748	51,598	1,944	23,368	1,259	546,236
	Duke Energy Indiana, Inc.	16.29	39.51	11.78	27.67	55.80	9,142	21,477	12,647	43,310	37	6,180	47	776,145
	Orange and Rockland Utilities, Inc.	16.94	51.08	12.86	37.81	68.02	2,873	8,445	3,784	15,191	0	18,905	50	223,336
	Duke Energy Kentucky, Inc.	17.13	37.61	8.89	28.66	54.74	1,198	3,864	2,310	7,380	4	862	10	134,819
	Metropolitan Edison Company	17.51	25.05	9.84	14.82	42.57	5,412	8,148	9,630	23,405	22,050	26,278	11	549,818
	Superior Water, Light and Power Company	17.93	21.75	5.66	14.73	39.68	83	216	263	582	132	842	0	14,666
	Pike County Light & Power Company	18.07	83.89	8.82	47.32	101.96	41	220	84	474	0	30	0	4,649
	Central Vermont Public Service Corporation	18.42	37.67	17.22	16.47	56.08	2,738	2,620	2,929	8,919	1,536	1,709	0	159,030
	Virginia Electric and Power Company	18.59	18.90	4.20	14.19	37.49	10,104	34,105	44,673	90,104	761	2,038	0	2,403,558

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Company Name	(904) Uncollectible Accounts per Retail Customer	(901-905 less 904) Customer Care Accts Exp per Retail Customer	(902) Meter Reading Exp per Retail Customer	(903) Customer Records & Collection Exp per Retail Customer	(901-905) Total Customer Accounts Expense per Retail Customer	Cust Accts-Meter Reading Exp ($000)	Cust Accts-Cust Rec & Coll Exp ($000)	Cust Accts-Uncollectible Accts ($000)	Cust Accts-Cust Acct Exp ($000)	Cust Service-Cust Assistance Exp ($000)	Cust Service-Cust Serv/Info Exp ($000)	Sales-Sales Exp ($000)	Ult Consumer Electric Customers
NSTAR Electric Company	19.09	31.43	3.88	24.23	50.52	4,467	27,889	21,976	58,153	70,087	74,848	2,295	1,151,066
Entergy Gulf States Louisiana, L.L.C.	19.54	45.36	8.88	35.45	64.90	3,356	13,398	7,385	24,528	401	2,126	2,531	377,960
Central Hudson Gas & Electric Corp	20.16	44.67	9.57	26.50	64.83	2,699	7,474	5,686	18,287	22,959	24,039	304	282,069
Wisconsin Electric Power Company	20.35	24.55	6.28	17.84	44.90	7,000	19,897	22,699	50,090	49,935	51,828	0	1,115,500
Public Service Company of New Hampshire	20.45	38.61	11.55	26.82	59.06	5,696	13,226	10,084	29,127	17,936	18,128	302	493,187
PPL Electric Utilities Corporation	20.82	24.03	1.44	21.34	44.85	2,013	29,834	29,094	62,688	21,237	27,017	2,472	1,397,730
Nevada Power Company	20.94	33.64	5.66	26.68	54.58	4,681	22,059	17,312	45,121	13,473	14,465	141	826,685
Entergy Arkansas, Inc.	20.98	47.56	9.50	37.10	68.54	6,560	25,616	14,485	47,325	6,851	9,152	1,509	690,500
Commonwealth Edison Company	22.29	42.25	8.37	33.71	64.54	31,725	127,848	84,531	244,746	64,756	69,782	0	3,792,295
Entergy New Orleans, Inc.	22.58	48.10	7.48	39.68	70.68	1,099	5,827	3,316	10,380	162	1,019	624	146,857
Consolidated Edison Company of New York, Inc.	23.23	47.17	9.59	35.48	70.39	31,426	116,296	76,130	230,741	0	21,623	14,067	3,277,855
Duke Energy Ohio, Inc.	23.95	38.68	8.45	30.18	62.63	5,774	20,628	16,372	42,814	24	4,102	71	683,606
Toledo Edison Company	24.90	25.09	7.05	17.06	49.99	2,191	5,301	7,737	15,532	9	1,339	169	310,725
Delmarva Power & Light Company	25.70	81.66	16.54	65.12	107.37	8,237	32,435	12,801	53,473	1,163	1,679	652	498,046
Public Service Electric and Gas Company	26.10	88.26	8.06	28.04	114.36	17,193	59,789	55,651	243,836	147,129	147,708	2,410	2,132,180
Ohio Power Company	26.30	37.63	6.93	28.69	63.93	4,923	20,377	18,679	45,401	1,455	3,908	26	710,161
Hawaii Electric Light Company, Inc.	28.62	47.88	10.69	35.28	76.50	852	2,811	2,280	6,095	0	2,471	111	79,678
Columbus Southern Power Company	28.62	39.32	5.63	32.03	67.94	4,220	23,996	21,443	50,899	293	2,514	10	749,192
Baltimore Gas and Electric Company	28.70	30.90	4.42	22.57	59.61	5,457	27,867	35,437	73,592	1,105	5,287	0	1,234,644
Potomac Electric Power Company	29.52	67.96	8.36	59.61	97.48	6,434	45,896	22,729	75,059	662	1,188	58	769,966
PECO Energy Company	34.83	64.36	9.66	34.59	99.18	15,119	54,108	54,484	155,165	8,912	12,525	1,010	1,564,433
Detroit Edison Company	36.45	36.15	5.93	26.47	72.60	12,645	56,470	77,755	154,861	66,628	72,673	1,344	2,133,001
Western Massachusetts Electric Company	39.50	37.22	4.19	31.21	76.72	855	6,374	8,066	15,668	10,923	11,235	4	204,220
Fitchburg Gas and Electric Light Company	42.25	43.73	1.26	42.29	85.98	36	1,204	1,203	2,448	1,281	1,287	242	28,472
Connecticut Light and Power Company	49.07	40.31	2.57	31.90	89.38	3,089	38,399	59,071	107,589	114,125	114,662	86	1,203,701
United Illuminating Company	65.65	60.49	17.50	42.97	126.14	5,685	13,961	21,327	40,979	31,902	31,956	0	324,865
NSPM	**10.52**	**34.09**	**14.90**	**18.94**	**44.61**								
Competitor Group - Mean	**13.66**	**38.62**	**8.36**	**27.05**	**52.39**								

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Xcel Energy	Company Name	(904) Uncollectible Accounts per Retail Customer	(901-905 less 904) Customer Care Accts Exp per Retail Customer	(902) Meter Reading Exp per Retail Customer	(903) Customer Records & Collection Exp per Retail Customer	(901-905) Total Customer Accounts Expense per Retail Customer	Cust Accts-Meter Reading Exp ($000)	Cust Accts-Cust Rec & Coll Exp ($000)	Cust Accts-Uncollectible Accts ($000)	Cust Accts-Cust Acct Exp ($000)	Cust Service-Cust Assistance Exp ($000)	Cust Service-Cust Serv/Info Exp ($000)	Sales-Sales Exp ($000)	Ult Consumer Electric Customers
	Kansas City Power & Light Company	0.00	36.37	7.85	24.26	36.37	4,018	12,409	0	18,606	9,575	11,995	678	511,581
	Kentucky Power Company	0.06	37.22	3.82	31.30	37.27	667	5,465	10	6,507	2,304	2,794	0	174,579
	CenterPoint Energy Houston Electric, LLC	0.10	15.82	4.29	11.51	15.92	9,142	24,547	208	33,939	30,056	32,225	0	2,132,480
	Southwestern Electric Power Company	0.56	44.83	8.08	34.61	45.40	3,927	16,824	273	22,070	2,821	8,713	0	486,161
	Public Service Company of Oklahoma	1.29	37.00	6.58	29.16	38.28	3,499	15,507	684	20,361	13,270	15,985	34	531,849
	MDU Resources Group, Inc.	2.22	25.19	6.83	15.17	27.41	844	1,875	274	3,387	285	370	138	123,569
	Entergy Texas, Inc.	2.32	34.62	9.20	24.68	36.94	3,743	10,045	945	15,036	8,477	10,956	1,218	407,005
	San Diego Gas & Electric Co.	3.02	39.96	6.17	33.65	42.98	8,507	46,385	4,163	59,250	127,425	128,639	0	1,378,468
	Florida Power & Light Company	3.30	26.41	6.99	18.51	29.71	31,581	83,651	14,919	134,299	100,282	133,958	9,514	4,520,327
	Northern Indiana Public Service Co.	3.31	34.56	8.39	22.20	37.87	3,834	10,143	1,512	17,298	0	529	1,248	456,826
	Arizona Public Service Company	3.37		10.01	43.57	59.48	11,166	48,594	3,756	66,343	46,951	51,166	9,225	1,115,309
	Oklahoma Gas and Electric Company	3.44	30.42	7.84	21.56	33.86	6,119	16,817	2,686	26,418	16,203	19,873	2,222	780,181
	NorthWestern Energy Division	3.49	22.64	5.08	17.42	26.13	2,022	6,929	1,388	10,395	4,526	6,100	211	397,760
	ALLETE (Minnesota Power)	3.65	41.09	4.37	36.72	44.74	636	5,347	532	6,516	10,959	11,081	352	145,632
	Interstate Power and Light Company	3.74	25.62	14.55	10.53	29.36	7,659	5,542	1,969	15,455	47,911	48,086	2	526,414
	Ohio Edison Company	3.94	20.83	7.12	13.16	24.77	7,385	13,643	4,084	25,684	15	4,809	1,810	1,036,981
	Avista Corporation	4.70	31.57	7.68	21.87	36.27	2,739	7,799	1,675	12,936	27,971	29,015	197	356,682
	Central Vermont Public Service Corporation	4.96	35.32	16.29	15.82	40.28	2,596	2,521	790	6,418	1,490	1,753	0	159,338
	Public Service Company of New Mexico	5.18	20.87	6.43	13.89	26.05	3,228	6,971	2,600	13,073	1,331	1,343	4,998	501,787
	Black Hills Power, Inc.	5.33	52.77	11.63	32.31	58.10	788	2,188	361	3,935	1,008	1,321	1	67,727
	Cleco Power LLC	5.34	51.51	13.19	32.11	56.85	3,682	8,965	1,492	15,874	5,117	7,184	3,820	279,208
	Southern California Edison Co.	5.51	37.95	8.00	23.15	43.46	39,194	113,423	27,022	212,979	503,138	596,000	13,804	4,900,326
	Jersey Central Power & Light Company	5.65	23.08	8.97	13.62	28.73	9,844	14,942	6,194	31,515	100,285	108,486	0	1,097,078
	Sierra Pacific Power Company	5.77	38.58	7.23	28.24	44.35	2,655	10,371	2,117	16,284	3,704	4,441	490	367,205
	Tucson Electric Power Company	6.18	41.13	8.13	33.01	47.31	3,269	13,279	2,487	19,034	9,394	10,779	0	402,325
	Entergy Louisiana, LLC	6.28	40.59	8.76	30.96	46.87	5,840	20,650	4,186	31,260	814	3,855	3,373	666,957
	Otter Tail Power Company	6.40	84.48	39.36	41.67	90.88	5,087	5,386	827	11,745	6,194	7,062	1,044	129,240
	Cheyenne Light, Fuel and Power Company	6.74	27.59	4.53	18.06	34.33	183	729	272	1,386	284	688	0	40,374
	Appalachian Power Company	6.88	34.42	4.53	28.35	41.30	4,351	27,250	6,615	39,701	1,969	3,807	0	961,229
	Wheeling Power Co	6.98	34.63	7.00	25.59	41.61	288	1,053	287	1,712	109	223	0	41,146
	Duke Energy Carolinas, LLC	7.03	34.37	2.15	31.86	41.40	5,146	76,092	16,784	98,886	1,003	26,232	1,140	2,388,580
	Carolina Power & Light Company	7.11	22.52	3.79	16.08	29.63	5,449	23,141	10,225	42,630	39,346	41,927	1,365	1,438,889
	Wisconsin Power and Light Company	7.49	17.83	7.66	9.61	25.32	3,497	4,387	3,420	11,556	35,144	35,301	0	456,421
	UNS Electric, Inc.	7.78	43.42	10.78	29.77	51.20	979	2,703	706	4,649	1,937	2,159	0	90,802
	Entergy Arkansas, Inc.	7.84	44.01	9.34	33.85	51.85	6,482	23,493	5,444	35,991	9,641	12,252	1,738	694,112
	Portland General Electric Company	7.91	51.04	-0.65	46.57	58.95	-536	38,201	6,492	48,355	8,220	10,573	0	820,266
	Mississippi Power Company	7.98	76.26	11.81	50.06	84.24	2,190	9,283	1,479	15,621	4,172	6,000	4,508	185,433
	Indianapolis Power & Light Company	8.10	34.09	12.25	20.48	42.19	5,736	9,587	3,793	19,752	1,687	1,788	0	468,161
	Kingsport Power Company	8.29	38.49	4.32	30.88	46.78	204	1,457	391	2,207	33	124	0	47,183
X	NSPM	8.49	34.58	15.41	19.00	43.07	21,007	25,908	11,575	58,722	78,347	80,375	93	1,363,421
	Pacific Gas and Electric Company	8.51	33.63	7.16	26.45	42.15	37,333	137,892	44,382	219,693	685,132	686,933	8,649	5,212,596
	South Carolina Electric & Gas Co.	8.73	66.43	5.12	55.72	75.16	3,371	36,714	5,754	49,529	2,821	3,595	1,632	658,951
	Florida Power Corporation	9.02	20.77	1.78	16.83	29.80	2,915	27,622	14,806	48,889	89,479	94,709	1,333	1,640,814
	Gulf Power Company	9.09	41.43	6.14	31.48	50.51	2,641	13,539	3,907	21,721	17,912	21,288	1,061	430,028
	Entergy Gulf States Louisiana, L.L.C.	9.11	39.76	8.60	30.19	48.86	3,277	11,498	3,468	18,608	454	2,524	2,687	380,832
	Entergy Mississippi, Inc.	9.23	45.94	8.70	36.35	55.16	3,809	15,910	4,039	24,146	1,353	3,648	1,087	437,716
	Central Hudson Gas & Electric Corp	9.39	48.20	9.48	34.18	57.59	2,635	9,501	2,609	16,009	26,626	27,223	352	277,980
	Toledo Edison Company	9.40	22.59	6.68	15.24	31.99	2,070	4,724	2,913	9,914	6	1,524	232	309,900
	Idaho Power Co.	9.45	35.51	8.21	26.47	44.97	4,027	12,989	4,639	22,066	51,960	53,208	0	490,705
X	NSPW	9.60	29.53	11.58	16.36	39.12	3,015	4,262	2,499	10,190	10,543	10,970	161	260,448
	Potomac Edison Company	9.64	21.99	7.87	11.00	31.63	3,342	4,672	4,092	13,430	6,809	6,975	1	424,654
	Upper Peninsula Power Company	9.82	60.17	14.43	44.03	69.99	748	2,283	509	3,629	300	414	0	51,851
	Alabama Power Company	9.89	56.83	4.70	45.23	66.73	6,756	64,956	14,211	95,834	32,421	37,962	10,849	1,436,229
	Entergy New Orleans, Inc.	10.00	44.09	7.05	36.25	54.09	1,085	5,582	1,539	8,328	3,307	4,346	721	153,967
	Westar Energy (KPL)	10.03	27.35	7.94	16.65	37.38	2,926	6,136	3,697	13,779	1,256	1,933	1	368,608
X	PSCo	10.04	20.01	4.03	15.88	30.05	5,509	21,696	13,713	41,055	111,164	113,002	497	1,366,148
	Wisconsin Public Service Corp	10.09	27.50	0.99	22.44	37.59	434	9,824	4,415	16,455	28,986	29,904	0	437,757
X	SPS	10.13	35.65	11.48	24.07	45.79	4,516	9,470	3,986	18,013	14,302	15,259	578	393,420
	Pennsylvania Electric Company	10.15	22.47	9.34	12.51	32.62	5,511	7,379	5,989	19,243	34,105	38,588	10	589,852
	Union Electric Company	10.28	29.15	8.43	18.99	39.43	10,037	22,611	12,242	46,955	4,763	11,331	259	1,190,872
	Rockland Electric Company	10.44	57.25	12.18	36.58	67.69	882	2,650	756	4,903	9,182	9,478	1	72,437
	Northwestern Wisconsin Electric Co.	10.46	39.73	17.08	22.27	50.18	227	296	139	667	0	267	5	13,291
	KCP&L Greater Missouri Operations Company	10.82	42.79	13.34	26.16	53.62	4,169	8,175	3,382	16,753	281	1,607	389	312,464
	Monongahela Power Company	11.02	25.51	9.85	13.18	36.54	3,799	5,080	4,249	14,085	906	963	0	385,504
	Unitil Energy Systems, Inc.	11.03	33.10	1.38	31.72	44.14	105	2,415	840	3,360	3,474	3,478	0	76,124
	Ameren Illinois Company	11.10	34.25	12.50	21.55	45.35	14,973	25,814	13,300	54,323	34,207	37,096	10	1,197,805
	Louisville Gas and Electric Company	11.30	22.00	5.13	13.56	33.30	2,029	5,367	4,475	13,184	9,691	10,182	30	395,868
	Virginia Electric and Power Company	11.39	18.12	3.65	14.03	29.51	8,842	33,998	27,597	71,492	19,218	19,522	0	2,422,970
	Kansas Gas and Electric Company	11.67	26.83	7.68	16.42	38.50	2,437	5,212	3,703	12,217	1,228	1,727	1	317,329
	West Penn Power Company	11.89	23.39	8.16	12.69	35.28	5,846	9,088	8,515	25,267	10,662	13,079	0	716,108
	Commonwealth Edison Company	12.57	42.85	8.03	34.62	55.42	30,543	131,635	47,808	210,714	101,192	105,919	0	3,801,999
	Orange and Rockland Utilities, Inc.	12.60	55.30	13.73	40.57	67.90	3,074	9,083	2,822	15,203	0	22,958	112	223,908
	El Paso Electric Company	12.91	39.53	7.10	28.94	52.44	2,649	10,800	4,817	19,569	456	456	0	373,155
	Madison Gas and Electric Company	12.96	36.62	2.84	32.74	49.57	400	4,607	1,823	6,975	7,234	8,562	168	140,700
	Kentucky Utilities Company	12.98	40.66	8.29	26.77	53.64	4,513	14,572	7,067	29,195	11,522	12,281	42	544,285
	Consumers Energy Company	12.99	26.35	6.84	17.08	39.34	12,230	30,554	23,229	70,360	63,131	63,443	75	1,788,635
	Tampa Electric Company	13.87	32.66	3.83	20.75	46.54	2,570	13,921	9,310	31,227	42,889	43,799	1,110	670,991
	Nevada Power Company	15.48	35.12	6.07	27.79	50.59	5,037	23,065	12,846	41,996	19,663	20,640	162	830,059
	Georgia Power Company	15.68	52.68	12.23	38.22	68.36	28,854	90,183	37,004	161,324	36,015	39,058	44,211	2,359,765
	Cleveland Electric Illuminating Company	16.22	18.81	5.60	12.49	35.03	4,214	9,395	12,203	26,352	9	3,594	1,088	752,207

FERC 904 Comparison
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Xcel Energy

Company Name	(904) Uncollectible Accounts per Retail Customer	(901-905 less 904) Customer Care Accts Exp per Retail Customer	(902) Meter Reading Exp per Retail Customer	(903) Customer Records & Collection Exp per Retail Customer	(901-905) Total Customer Accounts Expense per Retail Customer	Cust Accts-Meter Reading Exp ($000)	Cust Accts-Cust Rec & Coll Exp ($000)	Cust Accts-Uncollectible Accts ($000)	Cust Accts-Cust Acct Exp ($000)	Cust Service-Cust Assistance Exp ($000)	Cust Service-Cust Serv/Info Exp ($000)	Sales-Sales Exp ($000)	Ult Consumer Electric Customers
Southern Indiana Gas and Electric Company, Inc.	16.94	33.53	10.09	20.00	50.48	1,476	2,925	2,478	7,382	85	614	2,286	146,240
Superior Water, Light and Power Company	16.98	23.67	5.87	16.44	40.65	86	241	249	596	120	830	0	14,662
Empire District Electric Company	17.13	48.41	10.23	33.70	65.54	1,725	5,682	2,888	11,050	1,122	1,598	369	168,593
Metropolitan Edison Company	17.27	23.43	10.10	12.96	40.70	5,575	7,152	9,531	22,460	30,882	35,160	11	551,776
Public Service Company of New Hampshire	17.83	42.55	10.55	31.86	60.39	5,241	15,824	8,858	29,995	15,517	15,649	353	496,717
Duke Energy Indiana, Inc.	18.08	44.98	12.44	32.53	63.06	9,728	25,430	14,138	49,301	37	9,875	173	781,819
Consolidated Edison Company of New York, Inc.	19.92	48.29	9.53	36.53	68.22	31,539	120,833	65,910	225,667	0	25,574	12,461	3,308,063
Duke Energy Kentucky, Inc.	20.42	46.59	7.31	39.26	67.01	989	5,309	2,761	9,060	4	255	81	135,213
NSTAR Electric Company	20.44	30.78	3.42	24.06	51.22	3,956	27,838	23,645	59,259	106,249	110,131	2,405	1,156,908
PPL Electric Utilities Corporation	21.61	28.73	1.52	25.89	50.34	2,136	36,293	30,284	70,553	76,407	84,025	2,524	1,401,657
Duke Energy Ohio, Inc.	22.12	52.05	8.17	43.87	74.17	5,594	30,032	15,142	50,773	1,025	8,734	350	684,529
Delmarva Power & Light Company	22.16	82.35	14.84	67.50	104.51	7,415	33,731	11,072	52,220	1,999	2,611	725	499,689
Public Service Electric and Gas Company	22.41	89.46	7.94	31.62	111.87	17,100	68,136	48,284	241,062	163,281	163,957	1,977	2,154,826
Pike County Light & Power Company	22.79	65.15	9.46	47.95	87.94	44	223	106	409	0	36	2	4,651
Baltimore Gas and Electric Company	23.15	34.54	4.73	25.97	57.69	5,852	32,125	28,631	71,353	1,221	5,718	0	1,236,939
Atlantic City Electric Company	23.88	78.42	8.29	70.11	102.30	4,540	38,379	13,072	56,000	1,856	25,219	1,392	547,400
Detroit Edison Company	27.34	41.08	6.27	26.10	68.42	13,286	55,326	57,955	145,028	69,124	77,550	1,109	2,119,747
PECO Energy Company	33.39	65.82	10.04	34.84	99.21	15,728	54,586	52,325	155,454	59,336	64,356	872	1,566,872
Potomac Electric Power Company	33.58	73.01	7.85	65.16	106.60	6,146	51,028	26,299	83,473	1,443	1,465	2	783,069
Ohio Power Company	40.46	36.40	6.40	27.95	76.85	4,542	19,827	28,695	54,509	28,773	32,135	220	709,272
Connecticut Light and Power Company	41.08	44.87	2.39	38.79	85.95	2,883	46,840	49,602	103,782	115,305	115,912	59	1,207,437
Wisconsin Electric Power Company	41.12	24.93	7.07	17.39	66.05	7,911	19,449	46,002	73,889	57,509	59,183	233	1,118,695
Fitchburg Gas and Electric Light Company	43.69	46.23	1.39	44.66	89.91	40	1,283	1,255	2,583	2,136	2,142	358	28,728
Columbus Southern Power Company	45.63	38.14	4.92	31.56	83.77	3,685	23,650	34,193	62,767	26,680	29,746	204	749,275
Western Massachusetts Electric Company	51.58	46.19	3.45	35.49	97.77	711	7,304	10,617	20,123	15,931	16,465	7	205,818
United Illuminating Company	56.28	57.11	17.54	39.55	113.39	5,698	12,845	18,279	36,826	34,923	34,959	0	324,781
NSPM	**8.49**	**34.58**	**15.41**	**19.00**	**43.07**								

Xcel Energy	Company Name	(904) Uncollectible Accounts per Retail Customer	(901-905 less 904) Customer Care Accts Exp per Retail Customer	(902) Meter Reading Exp per Retail Customer	(903) Customer Records & Collection Exp per Retail Customer	(901-905) Total Customer Accounts Expense per Retail Customer	Cust Accts-Meter Reading Exp ($000)	Cust Accts-Cust Rec & Coll Exp ($000)	Cust Accts-Uncollectible Accts ($000)	Cust Accts-Cust Acct Exp ($000)	Cust Service-Cust Assistance Exp ($000)	Cust Service-Cust Serv/Info Exp ($000)	Sales-Sales Exp ($000)	Ult Consumer Electric Customers
	Kingsport Power Company	-6.51	40.98	3.56	34.43	34.47	169	1,633	-309	1,635	31	59	0	47,436
	Public Service Company of Oklahoma	-0.30	39.61	6.83	31.74	39.31	3,638	16,899	-160	20,930	21,197	23,053	28	532,395
	Kansas City Power & Light Company	0.00	36.43	7.95	24.26	36.43	4,072	12,425	0	18,655	11,907	14,911	527	512,082
	Kentucky Power Company	0.08	40.49	3.99	34.13	40.57	692	5,926	14	7,044	2,995	3,537	0	173,641
	Indiana Michigan Power Company	0.27	35.14	5.17	27.15	35.41	3,011	15,821	157	20,638	14,686	15,813	122	582,822
	CenterPoint Energy Houston Electric, LLC	0.55	13.17	2.23	10.92	13.73	4,834	23,647	1,196	29,719	32,639	33,545	0	2,165,283
	Southwestern Electric Power Company	0.56	46.15	8.19	36.05	46.71	4,270	18,802	292	24,366	4,543	10,338	0	521,601
	Northern Indiana Public Service Co.	0.78	38.10	8.59	25.55	38.87	3,924	11,677	355	17,763	0	581	365	456,937
	Duke Energy Ohio, Inc.	1.09	49.44	7.07	42.37	50.53	4,848	29,061	747	34,659	4,891	15,641	410	685,859
	Florida Power & Light Company	1.58	28.50	7.93	19.69	30.08	36,052	89,511	7,193	136,794	114,081	145,032	14,371	4,547,047
	West Penn Power Company	2.44	28.72	9.00	18.23	31.15	6,457	13,077	1,747	22,346	26,806	31,031	0	717,269
	Cheyenne Light, Fuel and Power Company	2.96	25.90	2.88	13.10	28.86	114	518	117	1,141	227	699	0	39,535
	San Diego Gas & Electric Co.	2.97	38.24	4.40	33.74	41.20	6,094	46,762	4,109	57,098	152,960	154,668	0	1,385,784
	Potomac Edison Company	2.99	21.86	8.44	11.56	24.85	3,282	4,496	1,163	9,662	13,114	13,346	0	388,814
	Otter Tail Power Company	3.14	87.71	41.72	42.41	90.85	5,392	5,481	406	11,743	7,195	8,063	753	129,250
	MDU Resources Group, Inc.	3.18	25.62	6.73	16.26	28.80	847	2,045	400	3,623	302	406	217	125,802
	Tucson Electric Power Company	3.57	38.89	7.53	31.36	42.46	3,037	12,650	1,441	17,127	12,118	13,181	0	403,340
	Tampa Electric Company	3.86	32.89	3.72	21.49	36.75	2,515	14,520	2,609	24,837	42,486	43,479	1,256	675,799
	UNS Electric, Inc.	4.37	39.84	10.21	26.77	44.22	932	2,443	399	4,035	1,891	2,226	0	91,255
	Florida Power Corporation	4.83	20.87	1.90	16.80	25.70	3,121	27,592	7,929	42,196	94,770	100,551	1,517	1,642,146
	ALLETE (Minnesota Power)	4.90	43.98	4.59	39.39	48.88	659	5,660	704	7,023	12,832	12,944	87	143,688
	Black Hills Power, Inc.	4.93	39.94	3.21	23.81	44.87	219	1,623	336	3,059	1,055	1,503	1	68,172
	Sierra Pacific Power Company	5.08	34.80	7.67	23.88	39.88	2,472	7,700	1,639	12,862	17,837	18,346	555	322,492
	Arizona Public Service Company	5.13	44.93	8.06	33.80	50.06	9,024	37,860	5,752	56,084	69,637	73,403	8,829	1,120,236
	Rockland Electric Company	5.16	61.86	12.20	36.23	67.02	884	2,626	374	4,857	10,059	10,230	33	72,473
	NorthWestern Energy Division	5.23	22.73	5.16	17.45	27.97	2,064	6,984	2,094	11,194	4,663	6,237	204	400,281
	Ohio Edison Company	5.35	19.67	7.14	12.11	25.02	7,383	12,526	5,532	25,880	19,709	25,348	1,920	1,034,534
	Cleco Power LLC	5.58	51.54	14.01	31.04	57.12	3,934	8,718	1,568	16,042	4,833	6,978	4,083	280,857
	Monongahela Power Company	6.25	25.50	11.38	12.82	31.75	4,401	4,960	2,418	12,282	1,070	1,184	0	386,819
	Southern California Edison Co.	6.31	39.07	6.37	24.82	45.38	31,366	122,138	31,040	223,330	565,278	676,619	9,628	4,921,228
	Appalachian Power Company	6.33	35.41	4.24	29.80	41.75	4,076	28,641	6,088	40,124	3,169	4,019	0	961,129
	Mississippi Power Company	6.40	78.68	12.00	52.12	85.07	2,230	9,683	1,188	15,804	4,172	6,596	4,240	185,768
	Duke Energy Carolinas, LLC	6.48	37.09	3.43	33.45	43.57	8,220	80,159	15,524	104,406	1,021	35,453	1,519	2,396,555
	Carolina Power & Light Company	7.09	21.92	3.70	15.82	29.01	5,349	22,869	10,239	41,920	43,962	46,612	1,023	1,445,158
	Entergy Texas, Inc.	7.27	34.35	9.64	24.06	41.62	3,969	9,905	2,992	17,135	10,692	13,044	746	411,690
	Indianapolis Power & Light Company	7.32	34.65	12.46	20.25	41.97	5,836	9,482	3,429	19,651	1,970	2,064	0	468,195
	Avista Corporation	7.35	32.53	7.89	22.49	39.87	2,827	8,057	2,632	14,287	28,480	29,533	8	358,303
	Northwestern Wisconsin Electric Co.	7.36	40.99	19.00	21.55	48.35	253	287	98	644	0	266	9	13,319
	Oklahoma Gas and Electric Company	7.41	28.52	5.15	21.21	35.93	4,051	16,686	5,826	28,258	22,326	25,292	4,186	786,522
	Public Service Company of New Mexico	7.41	23.21	7.71	14.52	30.63	3,887	7,317	3,736	15,435	1,149	1,167	5,525	503,963
	Entergy Arkansas, Inc.	7.50	43.64	9.27	33.70	51.14	6,446	23,435	5,217	35,562	9,628	12,179	1,226	695,397
	Gulf Power Company	7.71	42.49	5.11	33.33	50.19	2,208	14,411	3,333	21,704	26,374	30,088	1,149	432,401
	Entergy Louisiana, LLC	7.93	40.73	9.08	30.94	48.66	6,083	20,733	5,312	32,605	992	3,415	3,029	670,126
	Wisconsin Power and Light Company	8.14	15.69	5.41	9.73	23.83	2,476	4,456	3,730	10,916	38,039	38,237	0	458,041
	South Carolina Electric & Gas Co.	8.38	64.86	4.06	54.92	73.24	2,693	36,433	5,560	48,592	3,004	3,848	1,508	663,433
	Cleveland Electric Illuminating Company	8.46	17.54	5.70	11.32	26.00	4,271	8,479	6,336	19,471	5,901	10,121	1,198	748,935
	Entergy Mississippi, Inc.	8.58	46.38	8.87	36.80	54.96	3,887	16,122	3,758	24,081	1,211	3,557	785	438,140
	Black Hills Colorado Electric Utility Company, LP	8.61	24.35	1.49	18.52	32.95	140	1,745	811	3,105	294	593	14	94,227
	Idaho Power Co.	8.65	32.06	4.97	26.23	40.72	2,454	12,944	4,270	20,095	44,035	45,177	0	493,532
	Interstate Power and Light Company	8.90	25.77	14.65	10.58	34.67	7,714	5,573	4,689	18,262	43,038	43,264	0	526,732
X	NSPM	9.04	33.29	14.18	18.97	42.33	19,855	26,551	12,651	59,248	114,642	116,322	55	1,399,830
	Louisville Gas and Electric Company	9.08	22.24	5.45	13.13	31.32	2,147	5,175	3,578	12,341	10,169	10,660	25	394,063
	Alabama Power Company	9.44	54.67	2.80	48.24	64.11	4,015	69,205	13,535	91,960	30,881	32,479	8,989	1,434,487
	Wheeling Power Co	9.51	33.72	7.03	24.65	43.24	289	1,013	391	1,777	364	419	0	41,099
X	SPS	9.69	32.11	13.24	18.78	41.80	4,981	7,064	3,646	15,724	18,006	18,878	655	376,160
X	PSCo	9.94	19.95	4.25	15.63	29.90	5,829	21,455	13,649	41,045	99,914	101,593	539	1,372,892
	Toledo Edison Company	10.17	21.68	6.75	14.40	31.85	2,087	4,451	3,143	9,843	950	2,873	254	309,020
	Westar Energy (KPL)	10.36	28.37	8.46	17.11	38.73	3,122	6,316	3,824	14,294	1,210	2,089	1	369,106
	Entergy New Orleans, Inc.	10.37	45.12	6.91	37.54	55.49	1,102	5,985	1,653	8,847	3,258	4,079	734	159,431
	Madison Gas and Electric Company	10.38	37.82	3.00	33.80	48.20	424	4,780	1,468	6,816	6,967	8,335	184	141,414
	Wisconsin Public Service Corp	10.63	28.68	0.72	21.97	39.31	318	9,654	4,671	17,275	32,700	33,567	0	439,481
	Jersey Central Power & Light Company	10.71	22.04	9.27	12.40	32.75	10,191	13,634	11,772	35,995	109,854	119,589	0	1,099,194
	Pacific Gas and Electric Company	10.79	35.05	6.16	28.85	45.84	32,339	151,439	56,655	240,599	684,749	700,840	6,748	5,248,288
	Kentucky Utilities Company	10.93	41.28	8.94	25.91	52.21	4,836	14,012	5,912	28,236	13,128	13,800	33	540,839
	Ameren Illinois Company	11.89	32.94	12.22	20.41	44.84	14,754	24,635	14,357	54,119	43,884	46,559	7	1,206,980
	Orange and Rockland Utilities, Inc.	12.09	54.74	13.64	40.63	66.83	3,064	9,126	2,715	15,010	0	18,924	58	224,608
X	NSPW	12.17	26.15	6.90	17.59	38.31	1,727	4,400	3,043	9,583	10,265	10,662	78	250,123
	Portland General Electric Company	12.38	54.78	1.54	49.16	67.15	1,267	40,463	10,187	55,279	9,914	12,810	0	823,171
	Unitil Energy Systems, Inc.	13.07	37.25	1.04	36.21	50.32	79	2,760	996	3,835	2,502	2,505	0	76,212
	Union Electric Company	13.19	22.27	6.77	13.91	35.46	8,062	16,561	15,705	42,218	2,587	17,377	234	1,190,478
	Virginia Electric and Power Company	13.31	16.99	3.08	13.46	30.30	7,511	32,813	32,448	73,869	18,079	18,450	0	2,438,226
	Pennsylvania Electric Company	13.38	20.37	8.81	11.20	33.76	5,195	6,604	7,891	19,904	47,156	52,720	24	589,651
	Kansas Gas and Electric Company	13.59	27.68	8.20	16.80	41.27	2,605	5,335	4,316	13,107	1,246	1,900	1	317,580
	Superior Water, Light and Power Company	13.72	27.38	8.53	17.48	41.10	125	256	201	602	114	869	0	14,648
	Public Service Company of New Hampshire	14.12	47.07	11.65	35.26	61.19	5,805	17,565	7,035	30,482	16,242	16,512	343	498,175
	Commonwealth Edison Company	15.00	45.08	9.71	35.16	60.08	37,081	134,264	57,289	229,436	118,548	123,268	0	3,818,690
	KCP&L Greater Missouri Operations Company	15.66	44.59	14.95	26.18	60.25	4,675	8,187	4,898	18,840	1,017	3,164	276	312,684
	Nevada Power Company	15.99	32.25	5.82	25.37	48.23	4,879	21,269	13,406	40,444	57,087	57,972	260	838,482
	Central Vermont Public Service Corporation	16.31	36.07	17.00	15.68	52.38	2,722	2,511	2,611	8,386	1,476	2,038	0	160,105
	Western Massachusetts Electric Company	16.37	55.67	3.29	44.47	72.04	678	9,174	3,376	14,860	19,113	19,761	30	206,279
	El Paso Electric Company	16.40	41.63	8.80	31.66	58.02	3,330	11,985	6,207	21,965	619	830	0	378,547

FERC 904 Comparison
2011_Sept13

Xcel Energy Company Name	(904) Uncollectible Accounts per Retail Customer	(901-905 less 904) Customer Care Accts Exp per Retail Customer	(902) Meter Reading Exp per Retail Customer	(903) Customer Records & Collection Exp per Retail Customer	(901-905) Total Customer Accounts Expense per Retail Customer	Cust Accts-Meter Reading Exp ($000)	Cust Accts-Cust Rec & Coll Exp ($000)	Cust Accts-Uncollectible Accts ($000)	Cust Accts-Cust Acct Exp ($000)	Cust Service-Cust Assistance Exp ($000)	Cust Service-Cust Serv/Info Exp ($000)	Sales-Sales Exp ($000)	Ult Consumer Electric Customers
Southern Indiana Gas and Electric Company, Inc.	16.53	33.05	10.50	19.08	49.58	1,534	2,789	2,416	7,246	98	641	3,885	146,136
NSTAR Electric Company	17.49	31.66	3.19	25.21	49.16	3,715	29,325	20,347	57,175	164,969	168,942	2,465	1,163,076
Duke Energy Indiana, Inc.	17.55	48.91	12.63	36.28	66.46	9,885	28,401	13,740	52,028	50	13,514	323	782,879
Delmarva Power & Light Company	17.90	86.03	15.30	70.74	103.93	7,665	35,439	8,966	52,069	2,500	3,051	429	500,998
Central Hudson Gas & Electric Corp	18.27	48.29	9.51	34.81	66.56	2,608	9,543	5,009	18,248	36,747	37,803	348	274,152
Empire District Electric Company	18.65	39.75	10.69	25.02	58.39	1,777	4,159	3,099	9,705	1,332	1,831	329	166,207
Duke Energy Kentucky, Inc.	18.74	46.87	7.14	39.72	65.60	968	5,385	2,540	8,894	6	1,832	75	135,574
Consumers Energy Company	18.80	27.98	7.31	18.43	46.78	13,075	32,959	33,630	83,684	78,961	79,255	223	1,788,799
Georgia Power Company	19.18	54.78	10.72	40.69	73.96	25,313	96,055	45,267	174,575	57,843	59,416	45,122	2,360,487
Metropolitan Edison Company	20.85	20.99	9.10	11.72	41.84	5,031	6,478	11,522	23,121	46,035	51,285	25	552,631
Pike County Light & Power Company	21.23	68.63	9.65	45.89	89.86	45	214	99	419	0	42	2	4,663
Consolidated Edison Company of New York, Inc.	22.78	47.51	9.78	35.52	70.29	32,573	118,246	75,855	234,023	0	25,894	12,063	3,329,304
PPL Electric Utilities Corporation	23.40	29.20	1.28	26.32	52.60	1,795	36,945	32,846	73,846	106,965	113,834	2,316	1,403,889
Detroit Edison Company	23.97	45.31	6.26	26.75	69.27	13,277	56,722	50,815	146,875	52,658	61,965	1,581	2,120,262
Atlantic City Electric Company	24.07	82.45	8.47	73.99	106.52	4,638	40,527	13,183	58,347	2,051	31,840	2	547,762
Baltimore Gas and Electric Company	25.71	36.30	4.47	27.68	62.02	5,538	34,334	31,894	76,919	1,330	4,160	0	1,240,291
Potomac Electric Power Company	26.30	84.69	8.07	76.62	111.00	6,352	60,313	20,705	87,370	2,964	3,943	5	787,137
Upper Peninsula Power Company	28.26	53.66	14.70	34.89	81.92	763	1,811	1,467	4,252	240	267	0	51,903
Connecticut Light and Power Company	30.09	53.35	2.29	44.79	83.44	2,778	54,294	36,482	101,155	105,446	105,993	141	1,212,276
Public Service Electric and Gas Company	33.24	78.72	7.65	31.64	111.96	16,497	68,250	71,695	241,509	144,713	145,303	1,075	2,157,075
PECO Energy Company	36.28	68.35	9.66	36.68	104.64	15,209	57,732	57,107	164,693	61,055	65,657	1,271	1,573,976
Fitchburg Gas and Electric Light Company	38.54	49.91	1.56	48.35	88.45	45	1,395	1,112	2,552	3,273	3,273	499	28,851
Wisconsin Electric Power Company	40.34	26.00	7.30	18.15	66.34	8,183	20,346	45,222	74,368	56,996	58,126	743	1,120,964
Ohio Power Company	57.24	38.79	5.15	31.94	96.03	7,519	46,628	83,564	140,199	89,082	95,988	552	1,459,875
United Illuminating Company	62.35	56.23	17.79	38.44	118.58	5,759	12,443	20,185	38,389	32,474	32,512	0	323,738
NSPM	**9.04**	**33.29**	**14.18**	**18.97**	**42.33**								

FERC 904 Comparison
2012_Sept13

Xcel Energy	Company Name	(904) Uncollectible Accounts per Retail Customer	(901-905 less 904) Customer Care Accts Exp per Retail Customer	(902) Meter Reading Exp per Retail Customer	(903) Customer Records & Collection Exp per Retail Customer	(901-905) Total Customer Accounts Expense per Retail Customer	Cust Accts-Meter Reading Exp ($000)	Cust Accts-Cust Rec & Coll Exp ($000)	Cust Accts-Uncollectible Accts ($000)	Cust Accts-Cust Acct Exp ($000)	Cust Service-Cust Assistance Exp ($000)	Cust Service-Cust Serv/Info Exp ($000)	Sales-Sales Exp ($000)	Ult Consumer Electric Customers
	Kingsport Power Company	0.00	32.91	2.90	27.06	32.91	137	1,277	0	1,553	40	59	0	47,183
	Kansas City Power & Light Company	0.00	36.64	7.78	24.65	36.64	3,988	12,639	0	18,789	11,905	11,576	497	512,820
	Southwestern Electric Power Company	0.21	43.73	7.49	34.91	43.94	3,919	18,268	111	22,994	7,796	12,379	0	523,279
	CenterPoint Energy Houston Electric, LLC	0.53	13.30	1.16	12.12	13.84	2,561	26,666	1,174	30,430	35,780	36,693	0	2,199,375
	Indiana Michigan Power Company	0.55	30.88	3.96	25.04	31.43	2,310	14,605	321	18,333	19,877	20,798	224	583,336
	Kentucky Power Company	0.89	35.15	2.62	30.86	36.04	453	5,332	153	6,226	2,592	2,997	0	172,757
	Public Service Company of Oklahoma	0.91	36.99	6.48	29.76	37.90	3,468	15,918	487	20,276	18,491	20,225	85	534,948
	Wisconsin Electric Power Company	1.13	25.28	7.06	17.73	26.41	7,938	19,927	1,272	29,677	-23,502	-22,531	835	1,123,784
	Florida Power & Light Company	2.09	29.38	7.72	20.71	31.47	35,312	94,761	9,561	144,003	108,647	135,728	9,286	4,576,443
	Cheyenne Light, Fuel and Power Company	2.20	25.36	0.72	14.83	27.56	29	594	88	1,104	134	601	1	40,062
	San Diego Gas & Electric Co.	2.77	38.24	3.10	35.05	41.01	4,314	48,807	3,854	57,106	156,782	159,183	0	1,392,424
	Cleco Power LLC	2.98	50.73	13.28	31.32	53.71	3,753	8,850	841	15,177	3,396	5,181	4,226	282,595
	Sierra Pacific Power Company	3.24	32.03	6.91	22.61	35.27	2,243	7,336	1,052	11,444	26,303	26,834	579	324,453
	Tampa Electric Company	3.39	30.96	2.73	21.21	34.36	1,865	14,515	2,321	23,507	46,335	46,829	1,299	684,236
	Northern Indiana Public Service Co.	3.51	39.67	10.58	25.11	43.18	4,838	11,487	1,604	19,753	0	547	891	457,486
	Louisville Gas and Electric Company	3.60	23.07	5.55	14.17	26.67	2,182	5,576	1,416	10,493	11,053	11,879	1	393,438
	Black Hills Power, Inc.	3.73	33.66	0.50	22.05	37.38	34	1,509	255	2,559	1,247	1,556	5	68,450
	Carolina Power & Light Company	4.18	21.69	3.78	15.36	25.87	5,504	22,374	6,089	37,689	38,022	41,265	1,538	1,456,809
	Entergy Louisiana, LLC	4.24	40.32	8.55	31.11	44.56	5,763	20,960	2,854	30,023	856	3,212	2,672	673,831
	NorthWestern Energy Division	4.26	22.62	5.50	17.00	26.88	2,216	6,853	1,716	10,837	4,657	6,227	297	403,193
	Oklahoma Gas and Electric Company	4.27	30.41	6.15	21.49	34.68	4,886	17,069	3,391	27,549	19,185	24,618	5,817	794,320
	Tucson Electric Power Company	4.61	39.72	6.50	33.22	44.33	2,632	13,460	1,869	17,962	12,254	12,590	0	405,153
	Otter Tail Power Company	4.62	91.91	43.19	45.23	96.52	5,594	5,858	598	12,502	6,669	7,818	541	129,523
	ALLETE (Minnesota Power)	4.67	35.31	4.12	31.20	39.98	590	4,465	668	5,722	10,722	10,722	195	143,130
	Arizona Public Service Company	4.67	41.99	5.87	33.54	46.66	6,645	37,977	5,290	52,836	74,898	77,167	9,459	1,132,296
	Duke Energy Carolinas, LLC	4.93	32.42	3.53	28.74	37.36	8,504	69,282	11,894	90,059	1,061	34,215	1,416	2,410,646
	KCP&L Greater Missouri Operations Company	5.23	43.00	12.87	26.07	48.23	4,033	8,170	1,639	15,114	2,338	1,470	262	313,345
	UNS Electric, Inc.	5.65	42.17	10.13	28.78	47.82	930	2,643	519	4,391	5,576	5,761	0	91,821
	Florida Power Corporation	5.87	21.61	2.13	17.26	27.48	3,506	28,470	9,681	45,339	84,668	90,590	2,167	1,649,823
	Avista Corporation	5.91	33.02	8.06	22.72	38.92	2,906	8,191	2,130	14,034	24,468	25,756	8	360,553
	Gulf Power Company	6.01	42.79	3.60	35.29	48.80	1,565	15,332	2,611	21,201	34,961	37,818	993	434,440
	Central Vermont Public Service Corporation	6.21	27.89	12.54	13.05	34.11	2,018	2,100	1,000	5,489	1,628	2,143	0	160,942
	Alabama Power Company	6.30	55.37	1.65	50.68	61.68	2,371	73,001	9,080	88,847	32,787	34,380	9,501	1,440,488
X	NSPM	6.33	31.82	12.95	18.73	38.15	18,227	26,359	8,912	53,695	102,679	104,461	68	1,407,496
	Rockland Electric Company	6.42	64.59	7.18	42.64	71.02	521	3,093	466	5,152	11,370	11,484	1	72,546
	Public Service Company of New Mexico	6.69	23.58	8.06	15.07	30.27	4,076	7,621	3,384	15,307	1,090	1,095	5,890	505,649
	Indianapolis Power & Light Company	6.71	34.67	11.85	20.76	41.37	5,579	9,778	3,160	19,486	2,019	2,100	0	470,961
	Entergy Texas, Inc.	6.88	34.63	10.42	23.45	41.51	4,339	9,765	2,866	17,283	9,228	11,679	645	416,343
	Southern California Edison Co.	6.98	34.98	4.38	23.88	41.96	21,650	118,002	34,494	207,315	551,126	713,835	19,859	4,941,110
	Westar Energy (KPL)	7.07	28.27	8.09	17.84	35.35	3,006	6,626	2,627	13,128	1,160	1,905	1	371,402
	Entergy Mississippi, Inc.	7.38	46.89	9.03	37.19	54.27	3,971	16,360	3,247	23,873	942	3,229	897	439,875
	Potomac Edison Company	7.47	18.93	6.44	12.07	26.40	2,507	4,696	2,909	10,276	8,972	9,144	1	389,184
X	SPS	7.76	31.94	13.81	18.04	39.70	5,224	6,826	2,938	15,023	15,324	16,225	730	378,398
X	PSCo	7.96	19.52	3.77	15.66	27.49	5,199	21,624	10,995	37,952	107,935	109,828	629	1,380,646
	El Paso Electric Company	8.05	42.19	8.30	33.14	50.24	3,182	12,714	3,087	19,271	33	203	0	383,588
	Portland General Electric Company	8.09	54.80	1.10	47.99	62.90	912	39,708	6,698	52,044	9,949	12,207	0	827,467
	Entergy New Orleans, Inc.	8.10	42.64	6.19	35.84	50.74	1,015	5,873	1,328	8,314	1,696	2,619	659	163,854
	Wisconsin Power and Light Company	8.21	14.27	4.33	9.39	22.48	1,990	4,315	3,774	10,332	37,790	37,911	0	459,614
	Union Electric Company	8.54	19.40	7.11	10.79	27.94	8,492	12,885	10,198	33,352	3,769	22,682	342	1,193,671
	Ohio Edison Company	8.55	19.55	7.00	12.28	28.10	7,221	12,673	8,821	28,991	15,560	21,784	1,775	1,031,761
	South Carolina Electric & Gas Co.	8.59	61.58	3.42	52.77	70.18	2,284	35,286	5,747	46,930	4,582	5,380	1,536	668,719
	Northwestern Wisconsin Electric Co.	8.69	42.04	18.28	23.45	50.73	244	313	116	677	0	310	4	13,345
	Kentucky Utilities Company	8.72	43.84	9.24	28.50	52.56	4,978	15,345	4,695	28,303	13,560	14,622	2	538,461
	Interstate Power and Light Company	8.72	26.02	14.58	10.91	34.74	7,687	5,753	4,601	18,320	46,468	46,605	0	527,348
	Georgia Power Company	8.85	51.04	7.41	40.84	59.89	17,567	96,822	20,995	142,003	66,216	67,714	43,588	2,370,982
	Orange and Rockland Utilities, Inc.	8.96	56.79	8.12	48.28	65.75	1,829	10,877	2,019	14,812	8,906	20,594	19	225,279
	Wisconsin Public Service Corp	9.05	26.24	0.75	20.96	35.29	330	9,254	3,995	15,581	21,416	22,358	14	441,571
	Idaho Power Co.	9.06	30.12	2.77	26.47	39.18	1,380	13,189	4,513	19,523	33,737	35,123	0	498,282
	Superior Water, Light and Power Company	9.08	26.97	9.83	14.47	36.05	144	212	133	528	77	822	0	14,646
	Entergy Arkansas, Inc.	9.13	44.32	9.26	34.34	53.45	6,457	23,945	6,362	37,264	24,791	27,324	1,070	697,194
	Unitil Energy Systems, Inc.	9.58	36.16	1.33	34.83	45.74	102	2,670	734	3,506	2,673	2,678	0	76,651
	Madison Gas and Electric Company	9.59	38.84	3.27	34.48	48.43	466	4,908	1,365	6,894	7,887	9,264	207	142,342
	Jersey Central Power & Light Company	9.66	22.56	9.30	12.78	32.23	10,234	14,062	10,630	35,453	123,958	133,121	0	1,100,165
	Ameren Illinois Company	9.73	32.75	12.88	19.56	42.48	15,636	23,734	11,805	51,549	56,272	58,102	14	1,213,560
X	NSPW	10.40	26.64	7.49	17.39	37.04	1,879	4,363	2,609	9,292	12,045	12,386	71	250,838
	Pacific Gas and Electric Company	10.78	36.61	5.56	30.95	47.39	29,490	164,194	57,159	251,348	672,418	677,534	14,398	5,304,357
	Kansas Gas and Electric Company	10.94	28.15	8.49	17.37	39.09	2,707	5,536	3,487	12,457	1,240	1,893	0	318,678
	Commonwealth Edison Company	11.05	48.87	11.80	36.87	59.92	45,170	141,155	42,320	229,435	162,153	164,751	0	3,828,849
	Cleveland Electric Illuminating Company	11.13	17.64	5.77	11.53	28.77	4,304	8,590	8,292	21,442	20,839	25,392	1,049	745,328
	Virginia Electric and Power Company	11.43	18.80	2.99	15.37	30.23	7,351	37,740	28,070	74,240	24,441	24,755	0	2,455,492
	Southern Indiana Gas and Electric Company, Inc.	11.86	33.11	10.30	19.35	44.97	1,507	2,832	1,735	6,580	80	608	9,238	146,320
	Black Hills Colorado Electric Utility Company, LP	11.88	22.90	2.19	16.30	34.78	206	1,532	1,117	3,270	307	632	3	94,008
	Duke Energy Kentucky, Inc.	11.90	40.86	7.00	33.85	52.76	955	4,617	1,623	7,195	14	1,672	46	136,377
	Toledo Edison Company	11.97	23.09	7.63	15.14	35.06	2,350	4,666	3,689	10,804	6,333	8,277	247	308,147
	Duke Energy Indiana, Inc.	12.00	43.75	12.28	31.47	55.75	9,674	24,788	9,450	43,912	85	14,288	247	787,622
	Public Service Company of New Hampshire	12.91	47.09	11.96	34.57	60.00	5,983	17,287	6,457	30,002	18,974	19,053	211	500,048
	Consumers Energy Company	13.94	28.91	7.27	19.20	42.85	12,998	34,347	24,934	76,633	84,419	84,687	222	1,788,525
	Monongahela Power Company	14.72	22.87	8.82	13.62	37.59	3,413	5,268	5,695	14,543	570	989	7	386,908
	Central Hudson Gas & Electric Corp	15.03	51.64	8.67	39.19	66.66	2,268	10,251	3,931	17,438	31,513	32,628	327	261,585
	Pennsylvania Electric Company	15.54	20.29	8.22	11.61	35.83	4,843	6,842	9,160	21,124	47,062	52,361	15	589,505
	West Penn Power Company	15.71	17.58	4.76	11.67	33.29	3,410	8,365	11,265	23,866	24,856	25,712	40	716,955

FERC 904 Comparison
2012_Sept13

Xcel Energy Company Name	(904) Uncollectible Accounts per Retail Customer	(901-905 less 904) Customer Care Accts Exp per Retail Customer	(902) Meter Reading Exp per Retail Customer	(903) Customer Records & Collection Exp per Retail Customer	(901-905) Total Customer Accounts Expense per Retail Customer	Cust Accts-Meter Reading Exp ($000)	Cust Accts-Cust Rec & Coll Exp ($000)	Cust Accts-Uncollectible Accts ($000)	Cust Accts-Cust Acct Exp ($000)	Cust Service-Cust Assistance Exp ($000)	Cust Service-Cust Serv/Info Exp ($000)	Sales-Sales Exp ($000)	Ult Consumer Electric Customers
Potomac Electric Power Company	15.84	87.89	7.36	80.53	103.74	5,829	63,758	12,544	82,131	4,378	5,092	24	791,715
Empire District Electric Company	15.99	39.07	10.88	24.30	55.05	1,819	4,062	2,672	9,202	1,362	1,857	325	167,151
Appalachian Power Company	16.46	33.23	4.09	28.17	49.69	3,929	27,044	15,804	47,711	4,992	5,704	0	960,176
Nevada Power Company	17.00	31.22	3.34	26.66	48.22	2,833	22,649	14,441	40,961	114,173	114,966	250	849,435
Delmarva Power & Light Company	17.55	94.88	19.16	75.72	112.43	9,619	38,009	8,809	56,437	3,123	3,410	323	501,965
Detroit Edison Company	19.91	49.18	5.80	29.16	69.08	12,331	61,945	42,285	146,751	64,816	72,931	3,393	2,124,244
Atlantic City Electric Company	21.51	85.79	8.77	77.02	107.30	4,794	42,114	11,764	58,671	2,943	37,028	2	546,795
Connecticut Light and Power Company	21.96	53.99	2.82	45.02	75.95	3,421	54,714	26,684	92,300	114,294	114,499	181	1,215,257
Consolidated Edison Company of New York, Inc.	22.76	48.30	9.03	36.32	71.06	30,186	121,466	76,109	237,661	0	147,165	12,519	3,344,679
PPL Electric Utilities Corporation	22.86	28.91	1.14	25.81	51.77	1,597	36,316	32,161	72,840	103,215	110,168	2,150	1,407,031
Metropolitan Edison Company	23.20	20.87	8.31	12.09	44.07	4,599	6,693	12,841	24,388	45,880	51,152	14	553,405
Baltimore Gas and Electric Company	24.55	41.69	4.56	33.76	66.24	5,660	41,894	30,470	82,207	1,659	5,815	0	1,240,986
Wheeling Power Co	25.56	31.84	6.28	23.69	57.40	259	977	1,054	2,367	616	652	0	41,237
Western Massachusetts Electric Company	25.78	55.49	3.91	40.81	81.27	809	8,439	5,331	16,804	26,005	26,473	30	206,763
PECO Energy Company	34.72	65.92	10.08	33.93	100.64	15,909	53,544	54,789	158,825	68,184	71,139	545	1,578,200
Public Service Electric and Gas Company	37.93	84.67	7.85	31.01	122.60	16,998	67,123	82,092	265,371	161,822	162,478	1,665	2,164,583
Fitchburg Gas and Electric Light Company	47.71	47.99	1.35	46.68	95.71	39	1,348	1,378	2,764	3,521	3,521	549	28,880
NSTAR Electric Company	48.76	31.77	3.11	25.66	80.53	3,635	29,980	56,967	94,079	189,602	193,740	2,897	1,168,298
Ohio Power Company	59.84	41.36	5.37	30.71	101.21	7,836	44,845	87,397	147,804	85,852	90,060	1,603	1,460,393
United Illuminating Company	70.56	53.00	17.48	35.52	123.56	5,626	11,433	22,713	39,773	24,444	24,476	0	321,888
NSPM	**6.33**	**31.82**	**12.95**	**18.73**	**38.15**								

FERC 904 Comparison
2013_Apr14

Xcel Energy	Company Name	(904) Uncollectible Accounts per Retail Customer	(901-905 less 904) Customer Care Accts Exp per Retail Customer	(902) Meter Reading Exp per Retail Customer	(903) Customer Records & Collection Exp per Retail Customer	(901-905) Total Customer Accounts Expense per Retail Customer	Cust Accts-Meter Reading Exp ($000)	Cust Accts-Cust Rec & Coll Exp ($000)	Cust Accts-Uncollectible Accts ($000)	Cust Accts-Cust Acct Exp ($000)	Cust Service-Cust Assistance Exp ($000)	Cust Service-Cust Serv/Info Exp ($000)	Sales-Sales Exp ($000)	Ult Consumer Electric Customers
	Southwestern Electric Power Company	-1.06	42.14	7.95	32.83	41.08	4,175	17,250	-557	21,582	10,643	15,772	85	525,417
	Kentucky Power Company	-0.32	33.63	2.81	29.04	33.31	484	4,999	-55	5,734	3,367	3,691	31	172,138
	Indiana Michigan Power Company	-0.31	27.17	2.03	23.25	26.86	1,191	13,611	-182	15,722	30,440	31,205	99	585,386
	Kansas City Power & Light Company	0.00	37.32	8.39	25.01	37.32	4,320	12,874	0	19,211	11,208	13,659	423	514,805
	KCP&L Greater Missouri Operations Company	0.00	39.08	11.99	23.78	39.08	3,775	7,490	0	12,307	12,178	14,906	224	314,907
	Kingsport Power Company	0.02	31.65	2.71	26.19	31.67	128	1,238	1	1,497	37	53	7	47,265
	CenterPoint Energy Houston Electric, LLC	0.10	13.34	0.78	12.55	13.44	1,755	28,155	229	30,163	39,366	40,320	0	2,243,818
	Public Service Company of Oklahoma	0.18	34.40	6.25	27.36	34.57	3,361	14,719	95	18,603	20,449	21,640	115	538,053
	Florida Power & Light Company	1.90	27.23	6.34	20.12	29.13	29,312	93,111	8,773	134,779	108,634	137,369	4,799	4,626,927
	Rockland Electric Company	2.17	66.17	2.92	46.92	68.35	212	3,410	158	4,967	0	10,556	2	72,675
	San Diego Gas & Electric Co.	2.54	35.90	2.60	33.20	38.43	3,641	46,470	3,549	53,797	146,172	148,373	0	1,399,745
	Oklahoma Gas and Electric Company	3.31	24.35	2.84	19.96	27.66	2,278	16,022	2,660	22,210	25,677	31,269	6,107	802,834
	UNS Electric, Inc.	3.35	43.52	8.87	31.29	46.87	821	2,896	310	4,338	4,038	4,222	0	92,547
	Tucson Electric Power Company	4.09	40.39	6.11	34.27	44.47	2,504	14,035	1,674	18,213	15,109	15,663	0	409,529
	ALLETE (Minnesota Power)	4.28	36.00	4.60	31.40	40.28	665	4,540	619	5,824	13,459	13,459	217	144,573
	Arizona Public Service Company	4.29	41.55	4.06	35.06	45.84	4,657	40,234	4,923	52,597	75,820	77,723	9,332	1,147,462
	Cleco Power LLC	4.34	35.17	2.71	26.05	39.51	771	7,402	1,233	11,227	3,834	5,919	4,529	284,182
	Gulf Power Company	4.34	44.31	2.80	37.27	48.65	1,226	16,311	1,900	21,295	33,100	35,993	1,186	437,696
	Appalachian Power Company	4.78	32.29	4.16	27.19	37.08	3,993	26,084	4,589	35,569	6,329	6,965	155	959,302
	Kentucky Utilities Company	5.00	44.82	9.19	28.98	49.82	4,973	15,677	2,705	26,949	18,497	19,563	42	540,882
	Duke Energy Florida, Inc.	5.13	22.80	1.98	18.79	27.94	3,324	31,614	8,630	46,992	88,100	94,825	1,937	1,682,182
	MDU Resources Group, Inc.	5.26	24.05	4.09	18.16	29.31	544	2,417	700	3,900	92	255	139	133,062
	El Paso Electric Company	5.36	39.57	6.63	32.17	44.93	2,596	12,603	2,098	17,602	6	200	0	391,774
	Entergy Texas, Inc.	5.43	36.62	12.93	22.97	42.06	5,446	9,671	2,288	17,710	8,566	12,601	337	421,105
	Duke Energy Carolinas, LLC	5.53	27.09	2.86	24.04	32.62	6,937	58,379	13,439	79,219	994	28,943	1,427	2,428,441
	Northern Indiana Public Service Company	5.63	40.40	10.03	26.79	46.03	4,600	12,289	2,584	21,117	0	576	923	458,743
	Public Service Company of New Mexico	5.64	24.44	8.75	15.52	30.08	4,446	7,889	2,864	15,288	951	961	5,299	508,248
	Otter Tail Power Company	5.85	97.41	46.61	47.25	103.26	6,059	6,142	760	13,422	6,929	8,132	623	129,988
	Sierra Pacific Power Company	5.95	35.08	5.50	27.38	41.03	1,799	8,963	1,947	13,429	18,177	18,622	562	327,320
	Cheyenne Light, Fuel and Power Company	6.09	21.20	0.10	14.41	27.29	4	580	245	1,098	216	773	8	40,241
	Duke Energy Progress, Inc.	6.14	23.89	3.70	17.34	30.04	5,441	25,491	9,032	44,157	46,012	51,420	1,800	1,470,039
	Entergy Louisiana, LLC	6.52	40.51	8.20	31.79	47.03	5,544	21,505	4,413	31,816	883	3,353	2,147	676,476
	Black Hills Power, Inc.	6.58	34.63	0.25	24.94	41.21	17	1,725	455	2,850	1,094	1,338	39	69,156
	Avista Corporation	6.98	34.82	8.84	24.36	41.80	3,210	8,851	2,535	15,187	20,642	21,884	7	363,312
	Alabama Power Company	7.14	55.23	2.17	50.30	62.36	3,140	72,667	10,312	90,103	33,397	34,907	9,154	1,444,803
	Southern California Edison Company	7.25	31.23	3.67	21.44	38.48	18,209	106,467	36,008	191,060	504,509	598,329	14,170	4,965,241
	Portland General Electric Company	7.57	51.03	1.06	43.90	58.60	886	36,571	6,306	48,824	11,336	13,288	0	833,129
	Georgia Power Company	7.69	48.87	5.41	40.87	56.56	12,922	97,592	18,362	135,041	71,788	72,749	43,330	2,387,727
	Wisconsin Power and Light Company	7.93	11.85	4.13	7.19	19.78	1,907	3,321	3,661	9,135	21,529	21,643	0	461,836
X	NSPM	7.96	31.02	12.96	17.93	38.98	18,378	25,417	11,279	55,250	83,478	84,666	18	1,417,543
	Wisconsin Public Service Corporation	8.05	26.77	0.66	21.12	34.83	293	9,372	3,573	15,454	24,738	25,538	2	443,744
	Ohio Edison Company	8.14	17.20	6.09	10.84	25.34	6,291	11,199	8,402	26,166	17,855	24,190	1,046	1,032,776
	Potomac Edison Company	8.15	26.15	12.79	13.11	34.29	5,005	5,131	3,189	13,425	13,966	14,287	0	391,473
	Entergy Mississippi, Inc.	8.15	46.86	8.86	37.38	55.01	3,910	16,487	3,594	24,263	767	4,036	422	441,078
	Pacific Gas and Electric Company	8.39	38.10	4.83	33.02	46.48	25,852	176,786	44,903	248,874	610,178	616,738	13,922	5,354,262
	Ameren Illinois Company	8.51	32.62	13.35	18.97	41.13	16,318	23,191	10,404	50,285	59,564	61,910	2	1,222,570
	Commonwealth Edison Company	8.62	51.17	13.14	37.84	59.80	50,477	145,375	33,132	229,749	184,924	187,943	0	3,842,198
X	PSCo	8.83	18.61	3.33	15.16	27.44	4,639	21,109	12,292	38,200	124,466	125,572	641	1,392,244
	Duke Energy Ohio, Inc.	8.94	34.63	4.97	29.66	43.57	3,440	20,523	6,185	30,150	36	7,122	318	691,985
	Jersey Central Power & Light Company	9.04	24.35	10.97	12.95	33.39	12,038	14,204	9,921	36,629	122,421	132,126	0	1,096,950
	South Carolina Electric & Gas Co.	9.15	59.99	2.61	51.74	69.14	1,765	34,972	6,186	46,737	6,992	7,698	1,625	675,948
	Orange and Rockland Utilities, Inc.	9.16	55.16	3.25	51.63	64.32	737	11,691	2,074	14,564	24,091	27,905	9	226,446
	Westar Energy (KPL)	9.35	28.74	8.27	18.01	38.10	3,085	6,720	3,490	14,214	1,346	1,851	0	373,094
	Duke Energy Kentucky, Inc.	9.69	37.68	6.61	31.07	47.37	906	4,260	1,328	6,495	29	1,506	51	137,115
	Entergy Arkansas, Inc.	9.74	45.27	9.59	35.10	55.01	6,703	24,536	6,811	38,461	39,280	41,853	595	699,107
X	SPS	9.75	30.60	12.96	17.53	40.35	4,953	6,700	3,726	15,423	14,998	15,588	189	382,223
	Black Hills Colorado Electric Utility Company, LP	9.88	25.13	2.14	19.54	35.01	201	1,840	930	3,296	225	431	29	94,143
	Kansas Gas and Electric Company	9.91	29.54	8.25	18.94	39.44	2,640	6,060	3,169	12,619	1,297	1,827	0	319,937
	Southern Indiana Gas and Electric Company, Inc.	10.14	33.67	10.29	19.64	43.81	1,509	2,882	1,487	6,427	99	619	13,259	146,713
	Madison Gas and Electric Company	10.15	39.03	3.30	34.84	49.18	473	4,995	1,455	7,051	7,147	8,458	223	143,360
	Duquesne Light Company	10.32	24.08	5.05	15.18	34.40	2,984	8,959	6,093	20,307	29,038	29,038	0	590,346
	Duke Energy Indiana, Inc.	10.38	39.26	9.74	29.51	49.64	7,725	23,397	8,231	39,353	56	11,036	270	792,756
	Cleveland Electric Illuminating Company	10.43	14.82	5.12	9.46	25.25	3,812	7,043	7,771	18,809	12,751	17,273	331	744,879
	Idaho Power Co.	11.50	31.78	2.94	27.86	43.28	1,484	14,060	5,805	21,841	42,691	44,062	0	504,653
	Monongahela Power Company	12.27	26.75	11.12	14.81	39.03	4,301	5,731	4,749	15,100	1,181	3,520	0	386,898
	Unitil Energy Systems, Inc.	12.44	36.33	1.33	34.99	48.77	103	2,700	960	3,763	2,896	2,901	0	77,163
	Union Electric Company	12.76	19.55	7.16	10.58	32.31	8,567	12,668	15,273	38,686	37,827	57,800	447	1,197,295
X	NSPW	12.87	26.71	7.35	16.93	39.58	1,860	4,284	3,257	10,015	10,281	10,571	82	253,021
	Public Service Company of New Hampshire	13.18	44.66	12.44	31.72	57.84	6,236	15,906	6,608	29,001	18,750	18,751	42	501,416
	Virginia Electric and Power Company	13.61	20.61	3.03	17.03	34.23	7,496	42,179	33,708	84,749	24,462	24,653	0	2,476,191
	West Penn Power Company	13.62	24.39	11.76	12.45	38.01	8,445	8,936	9,779	27,287	20,120	21,121	0	717,894
	Toledo Edison Company	13.89	20.50	7.01	13.15	34.40	2,157	4,047	4,277	10,589	6,134	8,034	4	307,863
	Entergy New Orleans, Inc.	15.88	41.00	5.73	34.71	56.88	958	5,803	2,655	9,508	125	1,938	530	167,163
	Interstate Power and Light Company	16.22	24.79	14.96	9.29	41.01	7,910	4,912	8,580	21,688	39,691	39,823	0	528,847
	Nevada Power Company	17.09	32.64	2.02	29.33	49.73	1,732	25,198	14,680	42,720	67,915	68,921	218	859,012
	Delmarva Power & Light Company	17.53	88.18	16.87	71.31	105.71	8,510	35,978	8,842	53,329	2,733	3,159	428	504,496
	Empire District Electric Company	17.66	42.24	10.82	27.02	59.90	1,819	4,541	2,968	10,067	1,675	2,209	349	168,054
	Consumers Energy Company	18.21	27.98	7.18	18.05	46.18	12,856	32,312	32,592	82,676	82,600	82,970	72	1,790,148
	Potomac Electric Power Company	18.95	85.12	6.33	78.80	104.07	5,030	62,664	15,069	82,763	627	1,990	3	795,251
	Superior Water, Light and Power Company	19.44	28.16	9.62	14.87	47.60	141	218	285	698	253	1,049	0	14,664
	Atlantic City Electric Company	19.80	81.60	8.85	72.76	101.41	4,811	39,575	10,771	55,157	2,732	36,230	0	543,918

FERC 904 Comparison
2013_Apr14

Xcel Energy	Company Name	(904) Uncollectible Accounts per Retail Customer	(901-905 less 904) Customer Care Accts Exp per Retail Customer	(902) Meter Reading Exp per Retail Customer	(903) Customer Records & Collection Exp per Retail Customer	(901-905) Total Customer Accounts Expense per Retail Customer	Cust Accts-Meter Reading Exp ($000)	Cust Accts-Cust Rec & Coll Exp ($000)	Cust Accts-Uncollectible Accts ($000)	Cust Accts-Cust Acct Exp ($000)	Cust Service-Cust Assistance Exp ($000)	Cust Service-Cust Serv/Info Exp ($000)	Sales-Sales Exp ($000)	Ult Consumer Electric Customers
	Pennsylvania Electric Company	19.80	18.84	7.05	11.25	38.64	4,154	6,628	11,673	22,777	39,193	44,947	14	589,402
	Mississippi Power Company	20.14	75.55	12.51	48.66	95.69	2,332	9,071	3,755	17,838	4,254	5,798	4,175	186,406
	Consolidated Edison Company of New York, Inc.	20.27	47.54	9.37	35.81	67.80	31,427	120,138	67,983	227,454	0	288,861	9,641	3,354,613
	NSTAR Electric Company	20.68	30.01	3.16	24.30	50.68	3,705	28,504	24,252	59,449	195,795	200,433	3,102	1,172,940
	Western Massachusetts Electric Company	21.84	57.61	4.96	39.78	79.45	1,026	8,230	4,518	16,437	38,750	39,424	17	206,891
	PPL Electric Utilities Corporation	22.97	30.13	0.97	27.30	53.10	1,364	38,505	32,394	74,898	79,238	81,586	2,533	1,410,556
	Connecticut Light and Power Company	23.69	55.18	3.54	38.98	78.86	4,311	47,459	28,838	96,010	109,070	109,185	115	1,217,399
	DTE Electric Company	24.74	49.28	4.93	29.85	74.02	10,511	63,709	52,799	157,975	60,539	69,017	1,801	2,134,161
	Wisconsin Electric Power Company	24.97	23.43	5.34	17.60	48.40	6,016	19,829	28,141	54,545	50,142	51,157	845	1,126,869
	Metropolitan Edison Company	25.84	19.17	7.45	11.28	45.01	4,131	6,257	14,333	24,965	36,521	41,900	14	554,596
	Baltimore Gas and Electric Company	27.77	33.75	5.81	24.39	61.52	7,229	30,338	34,541	76,518	164	4,355	0	1,243,697
	Public Service Electric and Gas Company	29.52	100.49	7.77	33.16	130.01	17,038	72,748	64,764	285,256	225,057	225,491	743	2,194,066
	PECO Energy Company	36.45	60.74	7.80	35.80	97.19	12,347	56,638	57,673	153,767	58,892	60,870	899	1,582,153
	Fitchburg Gas and Electric Light Company	50.69	48.93	1.17	47.73	99.62	34	1,387	1,473	2,895	3,924	3,924	619	29,060
	United Illuminating Company	62.15	53.10	17.45	35.65	115.25	5,582	11,403	19,877	36,862	22,968	22,980	0	319,845
	Ohio Power Company	124.46	36.70	5.56	27.67	161.16	8,120	40,426	181,835	235,451	85,547	91,566	1,913	1,460,980
	NSPM	**7.96**	**31.02**	**12.96**	**17.93**	**38.98**								

FERC 904 Comparison
2014, May15

Xcel Energy	Company Name	(904) Uncollectible Accounts per Retail Customer	(901-905 less 904) Customer Care Accts Exp per Retail Customer	(902) Meter Reading Exp per Retail Customer	(903) Customer Records & Collection Exp per Retail Customer	(901-905) Total Customer Accounts Expense per Retail Customer	Cust Accts-Meter Reading Exp ($000)	Cust Accts-Cust Rec & Coll Exp ($000)	Cust Accts-Uncollectible Accts ($000)	Cust Accts-Cust Acct Exp ($000)	Ult Consumer Electric Customers
	Duke Energy Progress, Inc.	-2.16	25.78	3.21	21.86	23.62	4,773	32,489	-3,213	35,099	1,486,287
	Public Service Company of Oklahoma	-0.46	36.65	6.90	29.00	36.20	3,731	15,693	-248	19,586	541,107
	Duke Energy Florida, Inc.	-0.12	26.62	2.42	23.36	26.50	4,115	39,690	-208	45,018	1,699,077
	Kentucky Power Company	-0.06	36.33	3.51	30.99	36.26	601	5,299	-11	6,201	171,011
	Kansas City Power & Light Company	0.00	36.72	7.88	25.65	36.72	4,088	13,313	0	19,055	518,974
	KCP&L Greater Missouri Operations Company	0.00	38.28	12.21	24.99	38.28	3,867	7,912	0	12,119	316,583
	Duke Energy Carolinas, LLC	0.02	25.28	2.08	22.89	25.29	5,108	56,135	39	62,022	2,452,127
	Kingsport Power Company	0.04	31.53	3.09	26.98	31.57	146	1,275	2	1,492	47,253
	Indiana Michigan Power Company	0.11	27.29	1.94	23.45	27.40	1,134	13,736	67	16,054	585,877
	CenterPoint Energy Houston Electric, LLC	0.72	12.42	0.72	11.68	13.14	1,662	26,795	1,649	30,132	2,293,166
	Southwestern Electric Power Company	0.86	42.02	7.37	33.21	42.87	3,888	17,510	452	22,604	527,237
	Rockland Electric Company	1.53	59.23	9.88	49.14	60.75	719	3,576	111	4,421	72,769
	Florida Power & Light Company	2.05	23.10	3.91	18.32	25.15	18,418	86,265	9,644	118,415	4,708,818
	Oklahoma Gas and Electric Company	2.95	23.00	0.31	20.60	25.95	252	16,709	2,395	21,054	811,190
	Mississippi Power Company	2.96	83.65	12.36	53.00	86.62	2,306	9,887	553	16,158	186,545
	San Diego Gas & Electric Co.	3.00	28.19	2.31	25.64	31.19	3,256	36,095	4,223	43,897	1,407,604
	Arizona Public Service Company	3.39	41.79	2.65	36.89	45.18	3,087	42,902	3,942	52,544	1,163,079
	Tucson Electric Power Company	4.43	37.93	4.55	33.37	42.36	1,888	13,841	1,838	17,568	414,748
	Southern California Edison Company	4.83	30.62	2.64	20.31	35.45	13,199	101,402	24,117	177,028	4,993,449
	ALLETE (Minnesota Power)	5.12	33.50	3.36	30.14	38.61	487	4,371	742	5,600	145,033
	MDU Resources Group, Inc.	5.67	24.39	3.67	19.02	30.05	502	2,601	775	4,111	136,785
	Otter Tail Power Company	5.83	96.65	45.57	47.41	102.49	5,939	6,179	760	13,358	130,340
	Cheyenne Light, Fuel and Power Company	5.96	20.58	0.00	14.74	26.54	0	601	243	1,082	40,761
	Black Hills Power, Inc.	5.97	40.58	0.16	29.87	46.55	11	2,086	417	3,251	69,843
	NorthWestern Corporation	6.07	24.53	6.06	18.36	30.60	2,517	7,624	2,521	12,706	415,232
	Public Service Company of New Mexico	6.41	23.65	8.48	14.23	30.06	4,337	7,276	3,275	15,368	511,235
	Tampa Electric Company	6.41	34.95	2.88	24.37	41.36	2,036	17,211	4,527	29,204	706,160
	Pacific Gas and Electric Company	6.44	34.05	2.75	30.73	40.49	14,706	164,049	34,359	216,187	5,339,259
	Sierra Pacific Power Company	6.70	25.33	3.34	20.33	32.03	1,104	6,724	2,215	10,592	330,708
	Jersey Central Power & Light Company	6.90	23.66	10.30	12.96	30.56	11,340	14,260	7,595	33,640	1,100,630
	El Paso Electric Company	6.94	42.77	6.63	34.91	49.71	2,631	13,861	2,755	19,737	397,014
	Cleco Power LLC	6.98	31.04	0.08	25.21	38.02	22	7,199	1,994	10,857	285,523
	Avista Corporation	7.49	32.10	7.75	22.94	39.60	2,845	8,422	2,752	14,540	367,195
	Madison Gas and Electric Company	7.78	39.70	1.97	36.86	47.48	285	5,332	1,125	6,868	144,646
	Ameren Illinois Company	7.95	32.88	13.32	19.32	40.83	16,292	23,626	9,730	49,945	1,223,176
	Portland General Electric Company	8.20	53.43	0.88	46.83	61.63	740	39,382	6,899	51,831	840,993
	Southern Indiana Gas and Electric Company, Inc.	8.26	31.70	8.70	18.96	39.95	1,281	2,790	1,215	5,880	147,171
	Ohio Edison Company	8.27	18.19	6.78	11.09	26.47	7,019	11,483	8,565	27,397	1,035,096
	Northern Indiana Public Service Company	8.28	35.96	7.65	25.16	44.24	3,517	11,569	3,808	20,345	459,863
X	PSCo	8.48	18.13	3.21	14.83	26.61	4,510	20,846	11,924	37,413	1,406,090
	Duke Energy Kentucky, Inc.	8.65	39.54	4.57	34.01	48.20	630	4,689	1,193	6,645	137,869
	Duke Energy Ohio, Inc.	8.84	29.70	3.99	25.17	38.54	2,776	17,522	6,155	26,830	696,157
	Alabama Power Company	9.11	59.86	2.34	53.60	68.98	3,394	77,772	13,225	100,081	1,450,921
	Wisconsin Power and Light Company	9.15	13.35	4.45	8.28	22.50	2,066	3,843	4,247	10,442	464,047
	UNS Electric, Inc.	9.25	41.25	6.98	30.94	50.50	652	2,890	864	4,717	93,411
	Appalachian Power Company	9.35	33.33	4.81	27.64	42.68	4,612	26,477	8,962	40,890	958,029
	Wisconsin Public Service Corporation	9.48	25.94	-0.15	19.21	35.42	-69	8,560	4,225	15,788	445,682
	Entergy New Orleans, Inc.	9.51	40.13	6.21	33.21	49.64	1,054	5,641	1,615	8,432	169,855
	Entergy Texas, Inc.	9.68	32.72	10.34	21.66	42.41	4,400	9,216	4,121	18,046	425,554
	Cleveland Electric Illuminating Company	9.69	15.65	5.61	9.68	25.34	4,176	7,207	7,215	18,862	744,410
	Western Massachusetts Electric Company	9.71	53.56	5.25	38.83	63.26	1,092	8,071	2,018	13,151	207,877
	Gulf Power Company	9.73	47.74	2.43	40.41	57.47	1,075	17,874	4,304	25,421	442,369
	Louisville Gas and Electric Company	9.74	22.71	5.98	13.95	32.45	2,379	5,552	3,877	12,916	398,042
	Duke Energy Indiana, Inc.	9.86	40.59	8.89	31.45	50.44	7,091	25,086	7,861	40,233	797,580
	Indianapolis Power & Light Company	9.89	34.88	10.90	21.17	44.78	5,207	10,119	4,729	21,399	477,921
X	NSPM	9.97	30.64	13.00	17.54	40.61	18,586	25,068	14,244	58,047	1,429,379
	Entergy Arkansas, Inc.	9.97	42.63	9.50	32.43	52.60	6,662	22,735	6,992	36,880	701,092
	Entergy Louisiana, LLC	10.01	40.26	8.43	31.13	50.27	5,729	21,150	6,801	34,157	679,462
	Georgia Power Company	10.02	54.10	5.72	44.56	64.12	13,776	107,385	24,141	154,531	2,410,042
	South Carolina Electric & Gas Co.	10.24	61.04	2.36	53.20	71.28	1,616	36,424	7,010	48,801	684,671
X	SPS	10.34	30.38	13.09	17.19	40.72	5,038	6,617	3,979	15,673	384,883
	Entergy Mississippi, Inc.	10.86	44.05	8.88	34.58	54.91	3,925	15,290	4,800	24,275	442,111
	Potomac Edison Company	10.87	20.45	8.30	11.94	31.33	3,276	4,712	4,292	12,364	394,680
	Black Hills Colorado Electric Utility Company, LP	11.31	31.58	1.69	26.67	42.89	160	2,522	1,070	4,056	94,568

FERC 904 Comparison
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Xcel Energy	Company Name	(904) Uncollectible Accounts per Retail Customer	(901-905 less 904) Customer Care Accts Exp per Retail Customer	(902) Meter Reading Exp per Retail Customer	(903) Customer Records & Collection Exp per Retail Customer	(901-905) Total Customer Accounts Expense per Retail Customer	Cust Accts-Meter Reading Exp ($000)	Cust Accts-Cust Rec & Coll Exp ($000)	Cust Accts-Uncollectible Accts ($000)	Cust Accts-Cust Acct Exp ($000)	Ult Consumer Electric Customers
	Commonwealth Edison Company	11.68	53.54	14.19	39.12	65.22	54,818	151,178	45,131	252,022	3,864,059
	Westar Energy (KPL)	11.81	25.52	6.94	15.89	37.32	2,600	5,950	4,421	13,976	374,472
	Unitil Energy Systems, Inc.	11.95	38.35	1.21	37.13	50.30	94	2,875	925	3,895	77,438
	Union Electric Company	11.96	21.20	8.63	10.88	33.16	10,361	13,059	14,347	39,791	1,200,003
	Duquesne Light Company	12.12	28.66	5.99	17.28	40.78	3,541	10,219	7,166	24,116	591,422
	Toledo Edison Company	12.34	20.57	6.83	13.38	32.92	2,103	4,119	3,800	10,133	307,853
	Idaho Power Co.	13.12	36.79	3.32	32.48	49.90	1,699	16,630	6,716	25,549	511,957
	Public Service Company of New Hampshire	13.52	50.77	12.90	37.60	64.30	6,502	18,951	6,815	32,405	504,000
	Monongahela Power Company	13.79	26.12	12.42	13.05	39.91	4,824	5,072	5,357	15,506	388,542
	Kentucky Utilities Company	14.76	46.69	9.26	30.80	61.46	5,019	16,703	8,005	33,323	542,227
X	NSPW	15.05	25.81	6.37	17.03	40.86	1,620	4,328	3,824	10,384	254,118
	Interstate Power and Light Company	15.16	27.65	17.61	9.47	42.81	9,324	5,013	8,026	22,665	529,418
	Kansas Gas and Electric Company	15.22	33.74	8.29	22.84	48.96	2,666	7,344	4,892	15,741	321,501
	Wheeling Power Company	15.69	29.08	4.43	21.65	44.77	183	894	648	1,849	41,296
	Orange and Rockland Utilities, Inc.	15.80	65.52	11.13	54.03	81.32	2,525	12,254	3,583	18,444	226,808
	NSTAR Electric Company	16.13	27.44	5.33	20.08	43.57	6,288	23,686	19,029	51,405	1,179,867
	Nevada Power Company	17.15	28.66	1.88	25.30	45.81	1,642	22,110	14,986	40,032	873,963
	Empire District Electric Company	17.16	40.81	11.23	25.44	57.97	1,892	4,288	2,892	9,770	168,545
	Pennsylvania Electric Company	17.79	19.77	7.81	11.56	37.56	4,594	6,804	10,469	22,106	588,587
	Consumers Energy Company	18.07	28.99	7.26	18.71	47.06	13,000	33,511	32,364	84,296	1,791,366
	Central Hudson Gas & Electric Corporation	18.80	60.81	9.34	47.60	79.61	2,310	11,772	4,651	19,691	247,333
	Virginia Electric and Power Company	19.74	21.79	2.52	18.60	41.53	6,295	46,522	49,357	103,838	2,500,543
	West Penn Power Company	19.77	26.79	9.45	17.15	46.56	6,805	12,350	14,233	33,517	719,944
	Potomac Electric Power Company	20.53	91.38	5.71	85.67	111.90	4,597	68,952	16,521	90,071	804,892
	Consolidated Edison Company of New York, Inc.	22.33	47.72	8.94	36.19	70.05	30,100	121,879	75,219	235,949	3,368,083
	Atlantic City Electric Company	22.39	88.05	9.09	78.96	110.45	4,956	43,056	12,211	60,224	545,281
	Delmarva Power & Light Company	22.64	90.94	9.96	80.99	113.58	5,057	41,135	11,497	57,688	507,922
	DTE Electric Company	23.09	50.44	4.17	29.01	73.53	8,937	62,190	49,512	157,639	2,143,851
	PPL Electric Utilities Corporation	23.87	31.95	1.64	27.86	55.82	2,326	39,398	33,755	78,943	1,414,297
	Wisconsin Electric Power Company	25.11	22.06	4.25	17.19	47.17	4,806	19,440	28,386	53,327	1,130,631
	Metropolitan Edison Company	26.57	19.69	7.82	11.48	46.26	4,352	6,390	14,788	25,745	556,577
	Public Service Electric and Gas Company	28.52	112.70	7.64	31.92	141.22	16,825	70,254	62,774	310,842	2,201,077
	Superior Water, Light and Power Company	28.90	28.70	9.20	16.15	57.60	135	237	424	845	14,671
	PECO Energy Company	30.82	54.38	4.55	36.40	85.20	7,234	57,894	49,018	135,516	1,590,478
	Baltimore Gas and Electric Company	37.25	32.24	3.27	27.53	69.49	4,080	34,378	46,513	86,771	1,248,747
	Connecticut Light and Power Company	38.78	52.61	3.56	35.26	91.39	4,358	43,144	47,461	111,840	1,223,743
	Fitchburg Gas and Electric Light Company	54.75	51.24	1.20	50.04	105.99	35	1,456	1,593	3,084	29,098
	United Illuminating Company	84.97	57.63	12.79	39.04	142.60	4,033	12,308	26,787	44,955	315,256
	Ohio Power Company	130.48	33.28	5.33	26.93	163.76	7,804	39,423	191,010	239,732	1,463,881
	NSPM	**9.97**	**30.64**	**13.00**	**17.54**	**40.61**					

Company Name	(904) Uncollectible Accounts per Retail Customer	(901-905 less 904) Customer Care Accts Exp per Retail Customer	(902) Meter Reading Exp per Retail Customer	(903) Customer Records & Collection Exp per Retail Customer	(901-905) Total Customer Accounts Expense per Retail Customer	Cust Accts-Meter Reading Exp ($000)	Cust Accts-Cust Rec & Coll Exp ($000)	Cust Accts-Uncollectible Accts ($000)	Cust Accts-Cust Acct Exp ($000)	Ult Consumer Electric Customers
NSTAR Electric Company	-11.29	36.47	9.15	25.40	25.19	10,864	30,155	-13,402	29,900	1,187,198
Indiana Michigan Power Company	-0.39	26.58	1.40	23.22	26.19	825	13,637	-227	15,383	587,252
Kingsport Power Company	0.00	30.57	2.87	25.68	30.57	136	1,215	0	1,446	47,309
Kansas City Power & Light Company	0.00	38.62	8.71	25.46	38.62	4,574	13,364	0	20,274	524,988
KCP&L Greater Missouri Operations Company	0.00	38.70	11.96	24.58	38.70	3,805	7,821	0	12,314	318,151
CenterPoint Energy Houston Electric, LLC	0.06	15.08	0.64	14.43	15.13	1,508	33,843	129	35,480	2,344,532
Southwestern Electric Power Company	0.75	39.66	6.19	32.16	40.42	3,280	17,039	399	21,413	529,805
Public Service Company of Oklahoma	0.97	34.16	5.59	27.86	35.14	3,039	15,161	530	19,118	544,110
Florida Power & Light Company	1.13	22.03	3.21	17.63	23.16	15,333	84,194	5,381	110,574	4,775,370
Madison Gas and Electric Company	1.44	34.90	1.91	32.12	36.34	282	4,745	213	5,369	147,726
Kentucky Power Company	1.47	34.59	3.18	29.89	36.06	540	5,082	250	6,131	170,020
UNS Electric, Inc.	1.51	40.72	5.47	31.63	42.23	515	2,980	142	3,978	94,203
Cheyenne Light, Fuel and Power Company	1.80	21.54	0.05	17.51	23.34	2	721	74	961	41,177
Tampa Electric Company	2.32	34.16	3.18	24.78	36.47	2,284	17,811	1,667	26,215	718,712
Oklahoma Gas and Electric Company	2.88	21.72	0.28	19.20	24.60	232	15,749	2,360	20,171	820,059
Mississippi Power Company	2.96	83.65	12.36	53.00	86.62	2,306	9,887	553	16,158	186,545
NorthWestern Corporation	3.38	24.24	5.72	18.41	27.62	2,407	7,742	1,420	11,615	420,572
San Diego Gas & Electric Co.	3.43	28.65	1.72	26.76	32.08	2,441	37,915	4,861	45,453	1,416,660
Arizona Public Service Company	3.46	41.09	1.85	37.38	44.55	2,173	44,012	4,073	52,455	1,177,494
Sierra Pacific Power Company	4.24	24.11	3.03	19.67	28.35	1,014	6,575	1,417	9,477	334,279
Black Hills Power, Inc.	4.48	41.44	0.09	30.13	45.92	6	2,125	316	3,239	70,535
Gulf Power Company	4.56	50.47	2.35	43.16	55.03	1,051	19,318	2,041	24,629	447,557
El Paso Electric Company	4.66	42.91	6.40	35.12	47.57	2,578	14,138	1,877	19,148	402,518
Tucson Electric Power Company	4.67	38.18	2.88	35.29	42.84	1,203	14,722	1,946	17,871	417,141
Southern California Edison Company	4.76	30.93	2.20	21.40	35.69	11,021	107,448	23,894	179,164	5,019,896
ALLETE (Minnesota Power)	5.10	32.64	2.59	30.06	37.74	376	4,359	739	5,473	145,033
Louisville Gas and Electric Company	5.39	23.65	5.96	14.66	29.05	2,393	5,886	2,165	11,659	401,371
Rockland Electric Company	5.49	60.92	12.03	46.93	66.41	877	3,420	400	4,839	72,871
Duke Energy Kentucky, Inc.	5.50	42.11	6.71	33.66	47.61	930	4,665	763	6,599	138,605
Duke Energy Ohio, Inc.	5.64	36.06	1.91	33.16	41.70	1,338	23,252	3,957	29,239	701,129
Duke Energy Florida	5.84	27.71	2.00	25.07	33.55	3,445	43,166	10,055	57,771	1,721,848
Entergy Louisiana, LLC	5.89	29.47	6.16	22.84	35.36	4,197	15,561	4,012	24,090	681,195
Otter Tail Power Company	5.96	91.81	43.43	44.53	97.77	5,682	5,826	780	12,791	130,822
Appalachian Power Company	6.20	33.19	4.56	27.70	39.38	4,361	26,496	5,927	37,672	956,606
Duke Energy Carolinas	6.33	26.48	1.63	24.54	32.81	4,045	60,959	15,714	81,499	2,484,059
Idaho Power Co.	6.38	34.27	3.54	29.79	40.64	1,843	15,508	3,320	21,157	520,546
PSCo	6.42	16.97	3.15	13.75	23.38	4,483	19,571	9,134	33,293	1,423,787
Pacific Gas and Electric Company	6.49	34.63	2.16	32.09	41.13	11,698	173,828	35,171	222,794	5,417,160
Public Service Company of New Mexico	6.49	22.55	8.83	13.66	29.05	4,548	7,036	3,344	14,956	514,899
Portland General Electric Company	6.50	57.96	0.89	51.07	64.46	753	43,337	5,518	54,700	848,524
MDU Resources Group, Inc.	6.54	22.94	3.16	18.08	29.48	445	2,543	920	4,147	140,690
Georgia Power Company	6.91	56.56	5.80	46.54	63.47	14,151	113,522	16,862	154,823	2,439,237
Entergy Texas, Inc.	7.18	32.50	10.18	21.70	39.69	4,403	9,384	3,105	17,159	432,372
Alabama Power Company	7.78	58.94	2.21	52.92	66.72	3,221	77,188	11,344	97,311	1,458,602
Wisconsin Power and Light Company	7.81	15.42	4.41	10.31	23.23	2,056	4,802	3,636	10,818	465,746
Avista Corporation	8.14	33.45	8.25	23.54	41.59	3,083	8,796	3,041	15,539	373,614
South Carolina Electric & Gas Co.	8.20	60.87	2.55	52.57	69.07	1,773	36,529	5,698	47,994	694,834
Jersey Central Power & Light Company	8.30	25.99	11.41	13.53	34.29	12,627	14,971	9,177	37,931	1,106,242
Duke Energy Progress	8.31	26.83	2.62	23.59	35.13	3,944	35,536	12,517	52,930	1,506,535
NSPM	8.33	30.06	13.23	16.75	38.39	19,076	24,151	12,005	55,350	1,441,799
Northern Indiana Public Service Company	8.64	32.83	5.56	24.40	41.48	2,566	11,260	3,989	19,140	461,443
Indianapolis Power & Light Company	8.75	35.53	12.53	19.87	44.28	6,045	9,584	4,221	21,360	482,365
Kentucky Utilities Company	8.81	48.36	9.20	31.99	57.18	5,007	17,412	4,798	31,121	544,307

Company Name	(904) Uncollectible Accounts per Retail Customer	(901-905 less 904) Customer Care Accts Exp per Retail Customer	(902) Meter Reading Exp per Retail Customer	(903) Customer Records & Collection Exp per Retail Customer	(901-905) Total Customer Accounts Expense per Retail Customer	Cust Accts-Meter Reading Exp ($000)	Cust Accts-Cust Rec & Coll Exp ($000)	Cust Accts-Uncollectible Accts ($000)	Cust Accts-Cust Acct Exp ($000)	Ult Consumer Electric Customers
Baltimore Gas and Electric Company	9.15	35.43	2.01	31.98	44.58	2,527	40,226	11,508	56,076	1,257,765
Duke Energy Indiana	9.75	41.24	9.37	31.53	50.99	7,535	25,363	7,841	41,014	804,322
Entergy New Orleans, Inc.	9.77	35.89	6.86	28.44	45.66	1,240	5,139	1,766	8,252	180,726
Commonwealth Edison Company	9.95	53.80	14.27	39.28	63.74	55,624	153,073	38,762	248,386	3,896,654
Ohio Edison Company	9.96	22.05	8.34	12.64	32.00	8,652	13,113	10,328	33,195	1,037,216
Entergy Mississippi, Inc.	9.96	43.13	9.07	33.51	53.09	4,027	14,885	4,425	23,580	444,170
Union Electric Company	10.02	32.26	18.65	12.11	42.29	22,440	14,576	12,065	50,894	1,203,538
Entergy Arkansas, Inc.	10.04	40.86	9.22	30.95	50.90	6,495	21,795	7,069	35,843	704,178
Ameren Illinois Company	10.10	34.15	12.48	21.49	44.26	15,248	26,265	12,347	54,084	1,221,988
Westar Energy (KPL)	10.19	31.90	7.99	20.70	42.09	3,005	7,788	3,835	15,837	376,242
Potomac Edison Company	10.27	24.11	11.08	12.57	34.38	4,417	5,011	4,094	13,703	398,597
Black Hills Colorado Electric Utility Company, LP	10.42	31.50	1.44	27.24	41.91	137	2,583	988	3,975	94,835
Cleco Power LLC	10.42	32.26	0.01	26.80	42.67	4	7,680	2,986	12,231	286,610
Wisconsin Public Service Corporation	10.51	26.65	0.15	19.05	37.16	67	8,528	4,707	16,639	447,732
Empire District Electric Company	10.58	40.34	11.44	24.98	50.93	1,938	4,231	1,792	8,624	169,342
Orange and Rockland Utilities, Inc.	10.60	65.16	13.53	51.11	75.76	3,085	11,652	2,417	17,271	227,965
Southern Indiana Gas and Electric Company, Inc.	10.79	31.10	9.74	17.16	41.88	1,440	2,536	1,594	6,189	147,771
Unitil Energy Systems, Inc.	10.82	36.68	1.26	35.42	47.49	98	2,757	842	3,697	77,844
Interstate Power and Light Company	10.91	27.81	17.28	9.92	38.72	8,868	5,089	5,597	19,872	513,227
SPS	12.00	28.43	12.01	16.35	40.43	4,653	6,333	4,649	15,664	387,429
Virginia Electric and Power Company	12.66	22.89	3.03	19.22	35.55	7,651	48,545	31,961	89,770	2,525,459
NSPW	12.81	25.75	7.12	16.25	38.56	1,815	4,144	3,268	9,835	255,036
Wheeling Power Company	12.99	27.53	4.18	21.40	40.53	173	886	538	1,678	41,403
Cleveland Electric Illuminating Company	13.05	19.18	6.83	11.34	32.23	5,089	8,452	9,731	24,034	745,641
Kansas Gas and Electric Company	13.40	29.80	6.96	19.85	43.20	2,250	6,415	4,330	13,961	323,148
Consumers Energy Company	15.07	28.53	6.80	18.89	43.59	12,205	33,920	27,048	78,263	1,795,336
Consolidated Edison Company of New York, Inc.	16.49	47.30	8.96	35.44	63.79	30,456	120,409	56,021	216,744	3,397,758
Nevada Power Company	16.78	28.02	1.63	24.83	44.80	1,451	22,052	14,901	39,787	888,023
West Penn Power Company	17.32	20.97	9.05	11.61	38.28	6,534	8,382	12,498	27,631	721,791
PECO Energy Company	17.51	47.82	0.51	37.46	65.33	811	59,986	28,035	104,607	1,601,219
Public Service Company of New Hampshire	18.24	49.67	11.43	38.10	67.90	5,760	19,205	9,193	34,226	504,030
Toledo Edison Company	18.66	24.59	7.39	15.91	43.25	2,276	4,902	5,749	13,327	308,151
Superior Water, Light and Power Company	20.81	34.62	11.09	19.31	55.43	163	284	306	815	14,704
Duquesne Light Company	22.06	31.77	6.03	18.93	53.83	3,539	11,121	12,957	31,620	587,359
Monongahela Power Company	22.61	31.89	17.60	13.93	54.50	6,852	5,422	8,803	21,219	389,370
Central Hudson Gas & Electric Corporation	22.96	58.31	8.95	45.30	81.28	2,218	11,222	5,689	20,136	247,746
Potomac Electric Power Company	24.27	116.94	5.54	111.40	141.22	4,531	91,065	19,841	115,437	817,447
DTE Electric Company	24.49	50.77	3.48	28.47	75.26	7,497	61,356	52,780	162,184	2,154,874
Pennsylvania Electric Company	26.59	22.18	8.40	12.44	48.77	4,935	7,307	15,627	28,658	587,614
Wisconsin Electric Power Company	26.90	20.82	4.15	16.08	47.72	4,714	18,270	30,574	54,234	1,136,446
PPL Electric Utilities Corporation	27.48	33.53	1.92	28.46	61.01	2,727	40,368	38,981	86,548	1,418,528
Public Service Electric and Gas Company	29.25	101.85	7.70	32.49	131.10	17,055	72,001	64,820	290,553	2,216,274
Metropolitan Edison Company	31.85	22.51	9.38	12.19	54.36	5,244	6,816	17,817	30,405	559,325
Delmarva Power & Light Company	32.43	112.71	10.69	102.02	145.14	5,473	52,209	16,596	74,278	511,765
Atlantic City Electric Company	33.40	114.93	10.32	104.61	148.33	5,635	57,094	18,229	80,958	545,783
Connecticut Light and Power Company	34.37	46.71	3.28	31.95	81.08	4,036	39,305	42,288	99,752	1,230,280
Western Massachusetts Electric Company	39.80	47.84	5.09	32.98	87.63	1,062	6,880	8,301	18,279	208,590
Fitchburg Gas and Electric Light Company	72.02	51.86	1.27	50.59	123.88	37	1,478	2,104	3,619	29,214
United Illuminating Company	86.55	56.46	16.44	28.61	143.00	5,462	9,506	28,753	47,509	332,221
Ohio Power Company	122.98	33.87	4.99	27.83	156.84	7,308	40,749	180,047	229,629	1,464,068
NSPM	**8.33**	**30.06**	**13.23**	**16.75**	**38.39**					
Competitor Group - Mean	**12.90**	**38.86**	**6.66**	**28.95**	**51.76**					

Company Name	(904) Uncollectible Accounts per Retail Customer	(901-905 less 904) Customer Care Accts Exp per Retail Customer	(902) Meter Reading Exp per Retail Customer	(903) Customer Records & Collection Exp per Retail Customer	(901-905) Total Customer Accounts Expense per Retail Customer	Cust Accts-Meter Reading Exp ($000)	Cust Accts-Cust Rec & Coll Exp ($000)	Cust Accts-Uncollectible Accts ($000)	Cust Accts-Cust Acct Exp ($000)	Ult Consumer Electric Customers
Duke Energy Indiana	-2.30	36.11	8.95	26.87	33.81	7,275	21,847	-1,868	27,491	812,986
Kentucky Power Company	-0.78	34.58	2.29	30.96	33.80	387	5,228	-132	5,707	168,848
Baltimore Gas and Electric Company	-0.29	30.42	1.28	27.60	30.13	1,630	35,026	-362	38,239	1,268,995
Public Service Company of Oklahoma	-0.24	28.83	1.38	26.62	28.58	754	14,566	-133	15,640	547,142
Kansas City Power & Light Company	0.00	37.61	9.21	25.61	37.61	4,894	13,617	0	19,997	531,630
KCP&L Greater Missouri Operations Company	0.00	38.51	11.63	25.10	38.51	3,728	8,046	0	12,344	320,536
Indiana Michigan Power Company	0.03	26.12	1.42	22.68	26.14	835	13,361	15	15,399	589,041
CenterPoint Energy Houston Electric, LLC	0.05	14.26	0.58	13.68	14.31	1,388	32,810	111	34,309	2,397,549
Kingsport Power Company	0.11	31.23	2.93	26.24	31.33	139	1,246	5	1,488	47,489
Southwestern Electric Power Company	0.42	38.06	4.22	32.29	38.48	2,244	17,182	223	20,475	532,075
Florida Power & Light Company	0.65	20.72	2.47	16.73	21.37	11,951	80,989	3,155	103,438	4,840,266
NorthWestern Corporation	1.72	23.24	5.68	17.44	24.96	2,417	7,424	734	10,627	425,741
Duke Energy Ohio, Inc.	1.95	30.62	1.18	28.88	32.56	832	20,414	1,375	23,016	706,793
Duke Energy Kentucky, Inc.	2.26	42.15	6.04	34.36	44.41	845	4,811	317	6,218	140,014
Cheyenne Light, Fuel and Power Company	2.45	18.83	0.07	17.56	21.28	3	730	102	885	41,582
Oklahoma Gas and Electric Company	3.02	23.45	0.71	19.82	26.47	586	16,453	2,508	21,973	830,057
San Diego Gas & Electric Co.	3.12	27.83	1.61	26.05	30.95	2,300	37,124	4,449	44,111	1,425,132
Southern California Edison Company	3.36	29.46	1.92	20.21	32.82	9,710	102,028	16,966	165,721	5,049,192
Arizona Public Service Company	3.37	42.09	2.09	38.18	45.46	2,498	45,568	4,025	54,257	1,193,511
Tampa Electric Company	3.77	42.79	3.17	32.86	46.56	2,316	24,007	2,756	34,013	730,503
Madison Gas and Electric Company	4.04	37.50	1.84	34.81	41.54	277	5,238	608	6,252	150,491
UNS Electric, Inc.	4.05	38.75	4.63	30.72	42.80	440	2,920	385	4,069	95,067
Louisville Gas and Electric Company	4.35	25.16	5.88	16.47	29.51	2,380	6,665	1,760	11,945	404,744
Sierra Pacific Power Company	4.37	23.17	2.10	19.38	27.55	710	6,553	1,479	9,315	338,153
Duke Energy Progress	4.57	26.81	2.93	23.27	31.38	4,468	35,515	6,972	47,900	1,526,422
Duke Energy Florida	4.76	29.44	1.86	26.80	34.19	3,234	46,723	8,289	59,606	1,743,136
Duke Energy Carolinas	4.98	28.16	1.52	26.30	33.15	3,841	66,250	12,554	83,506	2,519,317
Entergy Mississippi, Inc.	5.17	41.90	9.47	31.80	47.06	4,229	14,204	2,308	21,021	446,654
Wheeling Power Company	5.19	29.03	3.49	23.31	34.21	144	962	214	1,412	41,269
Black Hills Power, Inc.	5.49	37.24	0.10	23.61	42.73	7	1,678	390	3,037	71,081
Public Service Company of New Mexico	5.54	23.02	9.34	13.92	28.56	4,844	7,220	2,871	14,810	518,639
Georgia Power Company	5.86	56.70	5.87	47.08	62.57	14,494	116,225	14,476	154,466	2,468,872
El Paso Electric Company	5.94	40.21	6.18	32.78	46.15	2,524	13,389	2,426	18,853	408,504
Portland General Electric Company	5.99	59.67	0.78	52.38	65.67	674	45,013	5,152	56,434	859,396
Gulf Power Company	6.50	49.42	1.96	43.01	55.92	887	19,488	2,946	25,341	453,136
ALLETE (Minnesota Power)	6.55	33.29	2.22	31.07	39.84	324	4,524	954	5,802	145,622
Entergy Louisiana, LLC	6.58	36.54	9.13	26.68	43.12	9,772	28,549	7,047	46,151	1,070,249
Wisconsin Power and Light Company	6.65	15.40	3.36	11.39	22.05	1,566	5,308	3,097	10,275	466,052
Alabama Power Company	6.80	57.84	2.08	51.79	64.64	3,050	76,073	9,986	94,943	1,468,744
Mississippi Power Company	6.84	82.57	11.79	52.09	89.41	2,211	9,769	1,283	16,769	187,553
Tucson Electric Power Company	6.86	39.99	2.53	37.45	46.85	1,064	15,724	2,879	19,668	419,845
Appalachian Power Company	6.90	32.61	4.45	27.11	39.51	4,254	25,941	6,605	37,801	956,718
PSCo	6.99	17.19	3.26	13.86	24.18	4,695	19,981	10,076	34,860	1,441,982
Otter Tail Power Company	7.08	87.90	43.72	39.82	94.98	5,743	5,230	930	12,476	131,354
MDU Resources Group, Inc.	7.13	27.13	3.36	21.88	34.26	480	3,127	1,019	4,897	142,948
Entergy Texas, Inc.	7.18	30.65	10.01	19.89	37.84	4,401	8,741	3,158	16,632	439,570
Northern Indiana Public Service Company	7.23	29.93	3.29	24.11	37.16	1,526	11,189	3,354	17,248	464,146
Pacific Gas and Electric Company	7.28	31.83	1.33	28.23	39.11	7,204	153,269	39,527	212,307	5,428,390
Idaho Power Co.	7.45	31.89	3.11	27.61	39.34	1,649	14,632	3,947	20,845	529,901
Kentucky Utilities Company	7.74	50.08	9.86	33.69	57.82	5,392	18,432	4,233	31,630	547,069
Jersey Central Power & Light Company	7.77	25.33	11.39	13.05	33.10	12,685	14,530	8,650	36,853	1,113,459
Virginia Electric and Power Company	8.07	23.52	3.53	19.31	31.58	8,992	49,248	20,568	80,534	2,550,018
Empire District Electric Company	8.21	39.07	11.66	23.02	47.28	1,988	3,925	1,400	8,062	170,529

Company Name	(904) Uncollectible Accounts per Retail Customer	(901-905 less 904) Customer Care Accts Exp per Retail Customer	(902) Meter Reading Exp per Retail Customer	(903) Customer Records & Collection Exp per Retail Customer	(901-905) Total Customer Accounts Expense per Retail Customer	Cust Accts-Meter Reading Exp ($000)	Cust Accts-Cust Rec & Coll Exp ($000)	Cust Accts-Uncollectible Accts ($000)	Cust Accts-Cust Acct Exp ($000)	Ult Consumer Electric Customers
Union Electric Company	8.37	32.38	18.73	12.19	40.74	22,642	14,734	10,118	49,258	1,208,934
Rockland Electric Company	8.37	63.98	12.53	50.00	72.35	916	3,656	612	5,290	73,116
Indianapolis Power & Light Company	8.40	34.28	11.68	19.31	42.67	5,684	9,403	4,087	20,773	486,827
Consumers Energy Company	8.40	29.92	7.93	18.86	38.31	14,313	34,036	15,155	69,143	1,804,630
South Carolina Electric & Gas Co.	8.41	59.44	2.69	50.55	67.84	1,896	35,636	5,927	47,831	705,025
Avista Corporation	8.46	36.13	8.85	25.72	44.60	3,315	9,634	3,170	16,702	374,507
NSPM	8.61	29.90	13.42	16.39	38.50	19,521	23,842	12,515	55,996	1,454,285
Entergy Arkansas, Inc.	8.61	39.80	11.30	27.85	48.41	7,988	19,690	6,084	34,220	706,879
Black Hills Colorado Electric Utility Company, LP	8.83	29.56	1.24	23.90	38.40	118	2,283	844	3,668	95,530
Monongahela Power Company	8.92	33.51	18.74	13.91	42.43	7,306	5,423	3,477	16,539	389,759
Unitil Energy Systems, Inc.	9.78	35.84	1.25	34.59	45.62	98	2,712	767	3,577	78,402
Southern Indiana Gas and Electric Company, Inc.	9.88	29.93	9.14	16.53	39.80	1,357	2,454	1,466	5,908	148,429
Orange and Rockland Utilities, Inc.	10.22	68.24	14.02	53.87	78.46	3,219	12,365	2,346	18,010	229,533
Consolidated Edison Company of New York, Inc.	11.04	47.69	9.19	35.15	58.73	31,424	120,212	37,773	200,873	3,420,121
Potomac Edison Company	11.26	23.33	10.20	12.18	34.59	4,104	4,901	4,529	13,916	402,327
Commonwealth Edison Company	11.28	50.25	12.14	37.84	61.53	48,012	149,635	44,595	243,296	3,953,907
Ohio Edison Company	11.50	21.33	8.62	11.73	32.83	8,972	12,216	11,974	34,184	1,041,123
Wisconsin Public Service Corporation	11.91	24.82	-0.37	18.17	36.72	-167	8,174	5,356	16,520	449,877
NSPW	12.04	24.35	7.17	15.01	36.39	1,839	3,851	3,088	9,336	256,540
Ameren Illinois Company	12.11	33.60	11.09	22.33	45.71	13,582	27,341	14,830	55,984	1,224,649
Central Hudson Gas & Electric Corporation	12.31	54.78	8.00	42.98	67.09	2,090	11,236	3,219	17,538	261,411
Cleveland Electric Illuminating Company	13.82	18.97	7.36	10.66	32.79	5,501	7,971	10,331	24,518	747,748
Westar Energy (KPL)	14.14	33.15	8.37	20.70	47.29	3,161	7,817	5,339	17,854	377,560
Public Service Company of New Hampshire	14.91	43.46	5.69	37.68	58.37	2,892	19,142	7,572	29,651	507,998
SPS	15.56	35.91	11.58	24.25	51.47	4,511	9,444	6,059	20,045	389,483
Superior Water, Light and Power Company	16.65	39.69	9.79	25.90	56.34	144	381	245	829	14,713
West Penn Power Company	17.52	19.65	8.41	10.61	37.17	6,080	7,674	12,674	26,887	723,352
Toledo Edison Company	17.55	24.49	8.41	14.92	42.03	2,600	4,612	5,423	12,991	309,060
Nevada Power Company	17.66	27.61	1.29	24.55	45.27	1,165	22,175	15,952	40,887	903,198
PECO Energy Company	18.84	44.44	0.39	40.06	63.28	637	64,622	30,393	102,080	1,613,041
Cleco Power LLC	19.14	33.62	0.02	26.12	52.76	6	7,522	5,512	15,195	288,013
Kansas Gas and Electric Company	19.40	28.54	4.83	19.82	47.94	1,575	6,459	6,324	15,625	325,932
Duquesne Light Company	19.58	28.61	5.91	16.82	48.19	3,477	9,891	11,511	28,334	587,954
Public Service Electric and Gas Company	22.50	80.04	7.60	34.03	102.54	16,929	75,789	50,105	228,368	2,227,065
DTE Electric Company	22.52	47.59	2.18	28.55	70.11	4,730	61,939	48,849	152,087	2,169,416
Entergy New Orleans, Inc.	23.04	33.31	6.76	26.03	56.35	1,341	5,165	4,571	11,180	198,416
PPL Electric Utilities Corporation	24.09	33.66	1.95	27.72	57.74	2,783	39,550	34,368	82,383	1,426,676
Interstate Power and Light Company	24.09	27.73	16.41	10.70	51.82	8,012	5,224	11,764	25,303	488,259
Pennsylvania Electric Company	24.85	21.18	8.17	12.13	46.03	4,797	7,124	14,593	27,031	587,251
NSTAR Electric Company	26.39	38.38	7.64	28.90	64.76	9,150	34,605	31,597	77,547	1,197,387
Metropolitan Edison Company	26.40	22.27	9.58	11.89	48.66	5,390	6,692	14,858	27,391	562,850
Wisconsin Electric Power Company	26.81	19.02	2.46	16.22	45.83	2,810	18,537	30,643	52,387	1,142,983
Potomac Electric Power Company	31.88	98.00	4.74	93.25	129.88	4,022	79,095	27,041	110,158	848,171
Delmarva Power & Light Company	37.66	105.32	10.60	94.72	142.98	5,479	48,942	19,457	73,878	516,709
Connecticut Light and Power Company	38.79	46.52	3.15	31.08	85.31	3,896	38,491	48,041	105,644	1,238,337
Western Massachusetts Electric Company	39.49	49.48	4.28	36.78	88.96	898	7,722	8,290	18,677	209,939
United Illuminating Company	51.98	54.78	16.71	26.97	106.76	5,553	8,965	17,276	35,484	332,381
Atlantic City Electric Company	52.45	109.90	10.01	99.89	162.35	5,488	54,784	28,765	89,038	548,442
Fitchburg Gas and Electric Light Company	55.20	49.18	0.99	48.19	104.38	29	1,416	1,622	3,067	29,382
Ohio Power Company	137.32	32.80	4.69	26.95	170.11	6,882	39,561	201,544	249,681	1,467,725
NSPM	**8.61**	**29.90**	**13.42**	**16.39**	**38.50**					
Competitor Group - Mean	**12.70**	**37.92**	**6.35**	**28.57**	**50.62**					

Company Name	(904) Uncollectible Accounts per Retail Customer	(901-905 less 904) Customer Care Accts Exp per Retail Customer	(902) Meter Reading Exp per Retail Customer	(903) Customer Records & Collection Exp per Retail Customer	(901-905) Total Customer Accounts Expense per Retail Customer	Cust Accts-Meter Reading Exp ($000)	Cust Accts-Cust Rec & Coll Exp ($000)	Cust Accts-Uncollectible Accts ($000)	Cust Accts-Cust Acct Exp ($000)	Ult Consumer Electric Customers
Duke Energy Kentucky, Inc.	-0.25	38.78	6.39	30.45	38.52	903	4,302	-36	5,442	141,273
Public Service Company of Oklahoma	-0.13	27.26	0.52	25.86	27.13	288	14,225	-72	14,920	550,022
Kansas City Power & Light Company	0.00	38.06	8.86	26.76	38.06	4,778	14,437	0	20,531	539,408
KCP&L Greater Missouri Operations Company	0.00	38.18	12.33	24.71	38.18	3,987	7,992	0	12,350	323,470
CenterPoint Energy Houston Electric, LLC	0.02	13.20	0.60	12.60	13.23	1,471	30,823	61	32,355	2,446,080
Duke Energy Indiana	0.06	35.62	9.96	25.50	35.68	8,161	20,899	51	29,240	819,569
Kentucky Power Company	0.22	35.10	2.33	31.74	35.32	390	5,319	37	5,920	167,599
Indiana Michigan Power Company	0.28	25.10	1.46	21.61	25.38	867	12,793	166	15,024	591,984
Southwestern Electric Power Company	0.84	36.47	3.74	31.22	37.31	2,002	16,689	450	19,948	534,632
Florida Power & Light Company	1.17	18.77	1.82	15.74	19.94	8,945	77,165	5,742	97,736	4,901,871
Northern Indiana Public Service Company	2.52	30.52	2.86	25.03	33.05	1,336	11,680	1,177	15,422	466,688
Southern California Edison Company	2.58	27.35	1.63	19.12	29.93	8,264	96,967	13,098	151,786	5,071,773
Duke Energy Ohio, Inc.	2.59	27.70	1.04	26.16	30.29	744	18,633	1,843	21,576	712,328
Sierra Pacific Power Company	2.93	23.51	1.79	19.01	26.44	611	6,505	1,003	9,047	342,107
UNS Electric, Inc.	3.06	39.63	3.00	32.64	42.69	288	3,137	294	4,103	96,122
Oklahoma Gas and Electric Company	3.20	24.58	0.13	20.94	27.79	108	17,556	2,684	23,292	838,252
Kingsport Power Company	3.28	29.41	2.53	25.02	32.69	121	1,197	157	1,564	47,840
San Diego Gas & Electric Co.	3.50	28.84	1.37	26.87	32.33	1,968	38,531	5,017	46,369	1,434,024
Madison Gas and Electric Company	3.73	48.34	2.16	46.29	52.07	330	7,064	569	7,946	152,601
Cheyenne Light, Fuel and Power Company	4.05	14.95	0.02	13.97	18.99	1	587	170	798	42,012
Duke Energy Florida	4.13	28.38	1.83	25.77	32.51	3,247	45,750	7,332	57,717	1,775,327
Duke Energy Progress	4.20	26.15	3.49	21.93	30.36	5,400	33,942	6,504	46,977	1,547,496
Georgia Power Company	4.50	50.32	5.42	42.16	54.82	13,553	105,469	11,250	137,123	2,501,473
Tampa Electric Company	4.60	47.87	2.47	37.04	52.47	1,836	27,584	3,422	39,073	744,691
Duke Energy Carolinas	4.60	28.32	1.43	26.60	32.92	3,651	68,063	11,759	84,236	2,558,843
Entergy Mississippi, Inc.	4.65	43.39	9.60	33.13	48.04	4,311	14,879	2,087	21,572	449,068
NorthWestern Corporation	4.90	25.48	5.88	19.50	30.38	2,535	8,407	2,111	13,096	431,099
Louisville Gas and Electric Company	4.93	26.15	5.90	17.24	31.09	2,410	7,045	2,017	12,706	408,738
Alabama Power Company	4.95	55.93	1.91	50.12	60.88	2,816	73,933	7,301	89,807	1,475,042
Public Service Company of New Mexico	5.01	24.04	9.31	15.21	29.05	4,861	7,939	2,615	15,166	521,984
Delmarva Power & Light Company	5.14	99.77	3.69	96.08	104.90	1,922	50,023	2,674	54,619	520,657
Arizona Public Service Company	5.63	42.98	1.92	38.84	48.61	2,333	47,181	6,836	59,041	1,214,627
Otter Tail Power Company	5.69	92.24	45.33	42.31	97.93	5,977	5,579	750	12,912	131,852
Tucson Electric Power Company	5.96	42.74	2.18	40.56	48.70	922	17,142	2,518	20,583	422,650
Jersey Central Power & Light Company	6.01	25.28	11.81	12.54	31.29	13,248	14,071	6,746	35,110	1,122,087
ALLETE (Minnesota Power)	6.12	38.78	3.68	35.10	44.91	539	5,137	896	6,572	146,353
Gulf Power Company	6.23	51.11	1.87	41.93	57.34	860	19,249	2,859	26,321	459,049
Portland General Electric Company	6.27	60.94	0.61	53.62	67.21	533	46,665	5,457	58,493	870,333
Potomac Edison Company	6.35	23.14	10.41	11.78	29.49	4,237	4,797	2,587	12,009	407,172
Union Electric Company	6.84	31.77	18.58	11.57	38.60	22,595	14,065	8,311	46,931	1,215,790
PSCo	7.05	16.36	3.04	13.26	23.41	4,432	19,348	10,281	34,160	1,459,152
MDU Resources Group, Inc.	7.10	24.79	3.56	18.99	31.90	509	2,713	1,015	4,558	142,901
Avista Corporation	7.26	35.46	8.41	25.76	42.72	3,187	9,762	2,752	16,191	379,027
Mississippi Power Company	7.32	76.47	11.68	46.98	83.79	2,191	8,813	1,374	15,719	187,594
Entergy Texas, Inc.	7.39	34.88	11.14	22.87	42.27	4,976	10,219	3,301	18,884	446,771
El Paso Electric Company	7.57	39.19	6.06	32.34	46.76	2,519	13,439	3,146	19,432	415,602
Kentucky Utilities Company	7.67	51.63	9.30	35.43	59.30	5,120	19,508	4,226	32,654	550,636
Pacific Gas and Electric Company	7.69	31.72	1.13	28.48	39.41	6,184	156,058	42,122	215,958	5,479,889
Black Hills Power, Inc.	8.03	33.72	0.29	22.09	41.75	21	1,590	578	3,005	71,977
Wisconsin Public Service Corporation	8.14	23.87	-0.25	16.15	32.01	-109	7,142	3,601	14,157	442,246
Baltimore Gas and Electric Company	8.19	33.40	1.55	30.16	41.58	1,983	38,634	10,490	53,272	1,281,044
Potomac Electric Power Company	8.27	95.32	1.31	94.01	103.59	1,132	81,120	7,139	89,392	862,921
Entergy Arkansas, Inc.	8.30	42.78	12.44	29.70	51.09	8,821	21,054	5,887	36,215	708,863

Company Name	(904) Uncollectible Accounts per Retail Customer	(901-905 less 904) Customer Care Accts Exp per Retail Customer	(902) Meter Reading Exp per Retail Customer	(903) Customer Records & Collection Exp per Retail Customer	(901-905) Total Customer Accounts Expense per Retail Customer	Cust Accts-Meter Reading Exp ($000)	Cust Accts-Cust Rec & Coll Exp ($000)	Cust Accts-Uncollectible Accts ($000)	Cust Accts-Cust Acct Exp ($000)	Ult Consumer Electric Customers
Unitil Energy Systems, Inc.	8.38	34.93	0.90	34.02	43.32	71	2,678	660	3,410	78,722
Rockland Electric Company	8.43	65.95	11.93	50.94	74.37	875	3,736	618	5,455	73,345
Virginia Electric and Power Company	8.43	23.06	3.64	18.81	31.49	9,362	48,436	21,712	81,089	2,574,679
Appalachian Power Company	8.81	32.84	4.63	27.17	41.65	4,421	25,973	8,417	39,807	955,861
Consumers Energy Company	8.86	24.73	4.88	16.62	33.59	8,865	30,183	16,093	61,010	1,816,438
NSPM	8.87	28.91	13.48	15.35	37.78	19,774	22,506	13,012	55,401	1,466,398
Wheeling Power Company	9.17	30.41	4.88	24.55	39.59	202	1,017	380	1,640	41,427
Cleco Power LLC	9.22	36.18	0.00	28.89	45.40	0	8,383	2,677	13,176	290,212
South Carolina Electric & Gas Co.	9.23	55.78	2.58	47.91	65.01	1,846	34,284	6,602	46,520	715,592
Duquesne Light Company	9.45	35.15	7.68	15.29	44.60	4,563	9,084	5,616	26,499	594,106
Central Hudson Gas & Electric Corporation	9.55	60.36	8.41	47.97	69.91	2,167	12,368	2,461	18,023	257,812
Empire District Electric Company	9.69	38.93	11.90	21.89	48.62	2,044	3,762	1,665	8,354	171,835
Orange and Rockland Utilities, Inc.	9.69	69.28	13.34	55.69	78.97	3,082	12,869	2,239	18,248	231,065
Entergy New Orleans, Inc.	9.79	39.32	6.88	31.76	49.11	1,377	6,356	1,959	9,829	200,137
Commonwealth Edison Company	9.80	47.69	9.77	37.65	57.48	38,987	150,278	39,102	229,443	3,991,358
Entergy Louisiana, LLC	9.97	38.16	9.59	27.77	48.13	10,338	29,946	10,757	51,910	1,078,545
Ameren Illinois Company	9.99	32.79	9.70	22.94	42.77	11,839	28,011	12,193	52,232	1,221,130
Black Hills Colorado Electric Utility Company, LP	10.29	29.95	1.14	23.80	40.24	110	2,288	989	3,868	96,119
Idaho Power Co.	10.62	30.94	2.86	26.33	41.56	1,545	14,206	5,733	22,428	539,590
Ohio Edison Company	11.21	21.17	8.76	11.26	32.38	9,167	11,788	11,736	33,895	1,046,760
Atlantic City Electric Company	11.44	105.27	10.01	95.26	116.71	5,518	52,521	6,309	64,348	551,332
Indianapolis Power & Light Company	11.62	32.93	9.93	20.37	44.55	4,880	10,007	5,708	21,889	491,347
Monongahela Power Company	11.73	34.37	19.86	13.60	46.10	7,760	5,315	4,585	18,017	390,806
Consolidated Edison Company of New York, Inc.	12.04	49.41	9.44	36.11	61.45	32,545	124,451	41,505	211,764	3,446,102
SPS	12.78	34.38	11.18	22.89	47.16	4,357	8,922	4,982	18,382	389,811
Southern Indiana Gas and Electric Company, Inc.	12.98	31.09	9.09	17.15	44.07	1,321	2,491	1,885	6,402	145,277
PPL Electric Utilities Corporation	13.09	35.32	1.81	30.04	48.41	2,588	42,929	18,700	69,181	1,429,090
NSPW	13.18	24.33	7.32	14.27	37.50	1,886	3,677	3,395	9,663	257,668
Public Service Company of New Hampshire	13.51	42.62	4.79	37.76	56.13	2,461	19,383	6,936	28,814	513,304
Westar Energy (KPL)	13.75	31.17	6.26	20.14	44.92	2,374	7,638	5,217	17,040	379,328
Wisconsin Power and Light Company	13.98	16.38	4.35	11.50	30.36	2,041	5,401	6,565	14,257	469,631
Cleveland Electric Illuminating Company	14.20	19.01	7.72	10.25	33.21	5,794	7,692	10,658	24,926	750,660
Kansas Gas and Electric Company	15.36	27.45	3.57	19.26	42.81	1,168	6,300	5,024	14,004	327,143
PECO Energy Company	15.56	44.80	0.33	42.08	60.37	544	68,456	25,317	98,209	1,626,898
Ohio Power Company	16.40	31.91	4.55	26.23	48.31	6,704	38,632	24,156	71,152	1,472,768
Nevada Power Company	16.79	28.20	1.29	24.26	44.99	1,185	22,286	15,419	41,320	918,452
Toledo Edison Company	17.04	24.06	8.31	14.61	41.10	2,579	4,534	5,288	12,753	310,305
West Penn Power Company	18.52	17.69	7.54	9.42	36.21	5,464	6,823	13,420	26,239	724,589
Superior Water, Light and Power Company	20.23	36.73	8.19	24.69	56.96	121	365	299	842	14,782
Interstate Power and Light Company	20.79	31.92	19.10	12.27	52.71	9,350	6,009	10,179	25,805	489,605
Public Service Electric and Gas Company	21.49	85.47	7.68	32.78	106.95	17,242	73,540	48,215	239,979	2,243,761
Pennsylvania Electric Company	21.61	18.93	6.45	11.59	40.53	3,787	6,805	12,682	23,792	586,984
DTE Electric Company	23.31	54.78	1.55	34.81	78.09	3,391	75,945	50,861	170,387	2,181,941
NSTAR Electric Company	23.44	39.62	5.26	32.67	63.06	6,346	39,431	28,290	76,121	1,207,094
Metropolitan Edison Company	24.23	20.12	7.87	11.43	44.34	4,461	6,476	13,730	25,130	566,695
Connecticut Light and Power Company	26.42	47.81	2.85	32.38	74.23	3,545	40,313	32,893	92,420	1,245,042
Wisconsin Electric Power Company	27.39	18.61	2.70	15.50	46.00	3,030	17,407	30,756	51,647	1,122,771
Western Massachusetts Electric Company	43.97	51.48	3.47	36.63	95.44	731	7,727	9,274	20,132	210,928
Fitchburg Gas and Electric Light Company	46.68	48.16	1.05	47.11	94.84	31	1,396	1,383	2,810	29,630
United Illuminating Company	58.40	54.85	17.00	26.18	113.25	5,669	8,731	19,478	37,772	333,518
NSPM	**8.87**	**28.91**	**13.48**	**15.35**	**37.78**					
Competitor Group - Mean	**10.11**	**38.07**	**6.11**	**28.74**	**48.18**					

Company Name	(904) Uncollectible Accounts per Retail Customer	(901-905 less 904) Customer Care Accts Exp per Retail Customer	(902) Meter Reading Exp per Retail Customer	(903) Customer Records & Collection Exp per Retail Customer	(901-905) Total Customer Accounts Expense per Retail Customer	Cust Accts-Meter Reading Exp ($000)	Cust Accts-Cust Rec & Coll Exp ($000)	Cust Accts-Uncollectible Accts ($000)	Cust Accts-Cust Acct Exp ($000)	Ult Consumer Electric Customers
Kingsport Power Company	-3.08	30.31	2.91	25.69	27.23	140	1,234	-148	1,308	48,032
Southwestern Electric Power Company	-0.70	38.86	4.37	33.03	38.16	2,343	17,712	-375	20,466	536,255
Duke Energy Kentucky, Inc.	-0.05	35.13	3.75	29.47	35.08	534	4,196	-7	4,995	142,393
Kansas City Power & Light Company	0.00	40.77	8.81	29.89	40.77	4,831	16,393	0	22,357	548,398
KCP&L Greater Missouri Operations Company	0.00	40.09	11.16	28.34	40.09	3,646	9,255	0	13,096	326,627
CenterPoint Energy Houston Electric, LLC	0.03	13.18	0.60	12.58	13.21	1,495	31,250	65	32,809	2,484,085
Indiana Michigan Power Company	0.09	26.33	1.67	22.50	26.42	995	13,394	56	15,725	595,192
Duke Energy Ohio, Inc.	0.22	30.87	0.96	29.29	31.09	687	21,030	158	22,327	718,099
Duke Energy Indiana	0.30	35.98	7.86	27.96	36.28	6,523	23,214	249	30,124	830,270
Kentucky Power Company	0.45	33.65	2.90	29.91	34.11	483	4,983	75	5,682	166,603
Public Service Company of Oklahoma	0.78	28.52	0.59	26.72	29.30	325	14,815	435	16,248	554,499
Florida Power & Light Company	1.56	16.48	1.55	13.94	18.05	7,693	69,159	7,748	89,531	4,961,313
Cleco Power LLC	2.74	34.58	0.01	27.54	37.32	2	8,006	797	10,851	290,740
UNS Electric, Inc.	3.11	39.47	1.67	34.15	42.58	159	3,260	297	4,065	95,475
Rockland Electric Company	3.28	67.49	10.31	51.57	70.76	758	3,792	241	5,203	73,526
Sierra Pacific Power Company	3.49	21.54	1.93	18.00	25.03	670	6,249	1,211	8,690	347,196
Southern California Edison Company	3.96	23.70	0.63	19.57	27.66	3,234	100,052	20,234	141,394	5,111,876
Oklahoma Gas and Electric Company	4.01	24.76	0.01	20.82	28.77	9	17,602	3,394	24,329	845,498
Cheyenne Light, Fuel and Power Company	4.41	14.05	0.33	12.89	18.45	14	547	187	783	42,428
San Diego Gas & Electric Co.	4.49	33.64	1.06	32.76	38.13	1,527	47,308	6,487	55,070	1,444,266
Georgia Power Company	4.70	45.37	3.87	38.79	50.08	9,829	98,402	11,923	127,025	2,536,685
Pacific Gas and Electric Company	4.90	32.07	1.05	29.87	36.97	5,761	163,432	26,821	202,279	5,471,777
Madison Gas and Electric Company	5.04	41.59	2.05	38.71	46.63	317	5,980	779	7,204	154,488
Duke Energy Florida	5.22	29.12	1.93	26.53	34.33	3,484	47,799	9,399	61,855	1,801,551
Avista Corporation	5.31	26.57	5.79	19.88	31.87	2,229	7,653	2,043	12,270	384,976
NorthWestern Corporation	5.78	25.62	6.00	19.52	31.40	2,619	8,520	2,524	13,706	436,535
ALLETE (Minnesota Power)	5.83	35.31	3.73	31.58	41.13	547	4,634	855	6,036	146,741
Potomac Edison Company	5.88	23.32	10.88	11.56	29.20	4,478	4,760	2,420	12,020	411,623
Tucson Electric Power Company	5.92	44.47	1.83	42.64	50.40	779	18,123	2,518	21,421	425,044
Northern Indiana Public Service Company	5.95	27.39	2.86	22.15	33.34	1,346	10,407	2,798	15,669	469,914
Idaho Power Co.	6.07	30.57	3.25	25.30	36.64	1,791	13,951	3,350	20,208	551,455
Jersey Central Power & Light Company	6.28	26.30	12.27	13.07	32.58	13,880	14,784	7,104	36,859	1,131,190
Public Service Company of New Mexico	6.34	24.82	9.83	15.46	31.16	5,172	8,139	3,338	16,403	526,345
Duke Energy Progress	6.37	29.33	3.52	25.06	35.70	5,526	39,373	10,009	56,084	1,571,011
Duke Energy Carolinas	6.41	26.92	0.95	25.83	33.33	2,455	67,078	16,638	86,529	2,596,447
El Paso Electric Company	6.69	40.42	5.92	33.91	47.12	2,498	14,320	2,827	19,896	422,281
Tampa Electric Company	6.75	46.08	2.10	35.56	52.82	1,586	26,891	5,101	39,947	756,253
Mississippi Power Company	6.80	78.84	11.20	51.23	85.64	2,106	9,632	1,279	16,100	188,000
Union Electric Company	6.97	36.81	18.32	16.84	43.78	22,422	20,606	8,529	53,570	1,223,736
Black Hills Power, Inc.	7.12	25.72	0.15	20.79	32.84	11	1,507	516	2,380	72,476
Alabama Power Company	7.18	54.21	1.69	48.42	61.40	2,503	71,684	10,636	90,894	1,480,475
Entergy Louisiana, LLC	7.30	39.16	9.77	28.49	46.46	10,586	30,866	7,912	50,347	1,083,560
Baltimore Gas and Electric Company	7.34	32.91	1.28	30.01	40.25	1,648	38,490	9,418	51,624	1,282,599
Louisville Gas and Electric Company	7.58	26.74	6.40	17.19	34.31	2,634	7,076	3,119	14,127	411,711
PSCo	7.94	15.06	3.43	11.59	23.00	5,070	17,136	11,746	34,024	1,478,991
Entergy Texas, Inc.	8.32	36.68	11.15	24.55	45.00	5,050	11,120	3,768	20,385	453,043
South Carolina Electric & Gas Co.	8.58	54.87	2.27	46.40	63.45	1,652	33,721	6,237	46,110	726,679
Otter Tail Power Company	8.59	90.81	46.53	39.92	99.39	6,149	5,275	1,135	13,135	132,150
Gulf Power Company	8.71	41.17	1.83	36.04	49.89	852	16,747	4,049	23,182	464,682
Virginia Electric and Power Company	8.74	23.41	3.89	18.49	32.14	10,120	48,098	22,728	83,609	2,601,179
Appalachian Power Company	8.76	33.32	4.87	27.84	42.08	4,650	26,601	8,375	40,211	955,578
Arizona Public Service Company	8.80	43.15	1.57	38.25	51.95	1,938	47,257	10,870	64,185	1,235,451
Consumers Energy Company	8.82	26.06	3.33	18.82	34.89	6,090	34,372	16,113	63,710	1,826,166

Company Name	(904) Uncollectible Accounts per Retail Customer	(901-905 less 904) Customer Care Accts Exp per Retail Customer	(902) Meter Reading Exp per Retail Customer	(903) Customer Records & Collection Exp per Retail Customer	(901-905) Total Customer Accounts Expense per Retail Customer	Cust Accts-Meter Reading Exp ($000)	Cust Accts-Cust Rec & Coll Exp ($000)	Cust Accts-Uncollectible Accts ($000)	Cust Accts-Cust Acct Exp ($000)	Ult Consumer Electric Customers
Delmarva Power & Light Company	8.89	91.65	2.63	89.02	100.54	1,380	46,768	4,672	52,821	525,355
Entergy Mississippi, Inc.	8.93	45.17	9.55	34.80	54.10	4,296	15,662	4,017	24,346	450,060
Wisconsin Public Service Corporation	9.03	16.35	1.20	11.31	25.38	534	5,028	4,013	11,283	444,647
NSPM	9.28	28.45	14.36	14.04	37.73	21,230	20,761	13,718	55,787	1,478,542
Ameren Illinois Company	9.33	31.45	9.62	21.69	40.78	11,744	26,474	11,391	49,777	1,220,681
Kentucky Utilities Company	9.38	53.47	9.90	36.21	62.85	5,474	20,022	5,186	34,751	552,923
Entergy Arkansas, Inc.	9.70	43.94	12.70	30.42	53.65	9,041	21,658	6,908	38,194	711,938
MDU Resources Group, Inc.	9.98	22.76	3.50	17.00	32.74	500	2,431	1,427	4,682	143,022
Ohio Edison Company	10.66	21.40	8.58	11.76	32.06	9,009	12,345	11,195	33,671	1,050,129
Wheeling Power Company	10.96	30.84	6.20	24.45	41.80	258	1,017	456	1,739	41,599
Commonwealth Edison Company	10.98	45.19	8.41	36.62	56.17	33,811	147,299	44,156	225,914	4,021,991
Black Hills Colorado Electric Utility Company, LP	11.12	26.13	0.70	23.92	37.24	68	2,313	1,075	3,602	96,716
SPS	11.29	30.53	11.98	17.70	41.83	4,694	6,932	4,424	16,384	391,714
Westar Energy (KPL)	11.54	28.23	3.62	20.72	39.77	1,385	7,916	4,408	15,194	382,092
Southern Indiana Gas and Electric Company, Inc.	11.59	29.23	8.53	16.31	40.82	1,248	2,386	1,695	5,972	146,305
Indianapolis Power & Light Company	11.98	29.82	7.84	19.80	41.81	3,906	9,863	5,969	20,827	498,193
Potomac Electric Power Company	12.06	90.06	1.13	88.93	102.12	990	77,889	10,563	89,442	875,876
Public Service Company of New Hampshire	12.74	42.47	4.60	37.71	55.21	2,378	19,507	6,590	28,564	517,349
Kansas Gas and Electric Company	12.85	26.16	2.25	20.27	39.01	743	6,691	4,243	12,878	330,082
Consolidated Edison Company of New York, Inc.	13.21	50.41	9.28	36.34	63.63	32,334	126,553	46,022	221,600	3,482,662
Monongahela Power Company	13.35	35.41	20.81	13.69	48.75	8,156	5,366	5,230	19,105	391,872
NSPW	13.42	23.73	7.65	13.32	37.15	1,984	3,456	3,481	9,637	259,379
Central Hudson Gas & Electric Corporation	13.98	62.39	8.31	50.25	76.37	2,197	13,284	3,695	20,191	264,382
Superior Water, Light and Power Company	14.01	35.63	6.67	25.86	49.64	99	384	208	737	14,847
Duquesne Light Company	14.24	32.55	6.90	13.23	46.79	4,125	7,905	8,509	27,955	597,498
Empire District Electric Company	14.48	40.40	11.98	22.64	54.87	2,073	3,918	2,505	9,495	173,041
Wisconsin Power and Light Company	14.70	15.53	4.13	11.39	30.22	1,956	5,397	6,961	14,315	473,646
Portland General Electric Company	14.92	64.78	0.43	56.90	79.70	377	50,173	13,160	70,279	881,766
Orange and Rockland Utilities, Inc.	15.34	69.65	11.51	57.87	84.99	2,679	13,468	3,571	19,779	232,715
Nevada Power Company	15.68	27.72	1.67	24.41	43.41	1,561	22,813	14,655	40,564	934,534
Unitil Energy Systems, Inc.	16.06	42.87	0.74	42.13	58.93	58	3,313	1,263	4,634	78,634
Cleveland Electric Illuminating Company	16.79	20.02	8.22	10.68	36.80	6,184	8,031	12,623	27,674	751,980
Entergy New Orleans, Inc.	17.72	39.49	6.87	31.75	57.21	1,393	6,434	3,591	11,593	202,634
Toledo Edison Company	17.74	23.93	8.29	14.38	41.67	2,577	4,471	5,516	12,957	310,979
West Penn Power Company	18.46	16.89	6.44	9.68	35.35	4,674	7,030	13,408	25,671	726,159
PECO Energy Company	19.15	43.50	0.33	40.54	62.66	547	66,505	31,419	102,772	1,640,278
PPL Electric Utilities Corporation	20.02	34.44	1.64	29.11	54.46	2,357	41,937	28,846	78,460	1,440,560
Atlantic City Electric Company	21.09	104.02	10.05	93.97	125.11	5,576	52,142	11,704	69,421	554,881
NSTAR Electric Company	22.73	41.82	4.93	34.73	64.55	7,039	49,579	32,442	92,147	1,427,545
Metropolitan Edison Company	23.29	17.95	5.30	11.78	41.25	3,023	6,716	13,277	23,511	569,982
Public Service Electric and Gas Company	24.27	78.06	7.46	32.14	102.33	16,900	72,847	55,025	231,967	2,266,833
Pennsylvania Electric Company	24.54	16.68	3.75	11.97	41.22	2,200	7,026	14,401	24,189	586,891
Wisconsin Electric Power Company	26.85	18.16	2.14	15.39	45.01	2,415	17,393	30,350	50,882	1,130,435
Interstate Power and Light Company	27.17	31.48	19.36	12.13	58.66	9,490	5,945	13,322	28,757	490,245
Connecticut Light and Power Company	36.21	46.50	2.91	32.96	82.71	3,635	41,231	45,300	103,471	1,251,053
DTE Electric Company	38.65	53.79	1.10	34.27	92.44	2,412	75,283	84,899	203,044	2,196,473
Fitchburg Gas and Electric Light Company	64.82	57.29	0.84	56.45	122.11	25	1,688	1,938	3,651	29,900
Ohio Power Company	67.98	31.24	4.29	25.84	99.23	6,363	38,350	100,906	147,283	1,484,322
United Illuminating Company	77.76	56.25	15.74	31.05	134.01	5,287	10,432	26,126	45,023	335,965
NSPM	**9.28**	**28.45**	**14.36**	**14.04**	**37.73**					
Competitor Group - Mean	**11.74**	**37.35**	**5.84**	**28.69**	**49.08**					

Xcel Energy®
RESPONSIBLE BY NATURE®

NORTHERN STATES POWER COMPANY

SERVICE ADDRESS	ACCOUNT NUMBER		DUE DATE
CUSTOMER NAME STREET ADDRESS CITY ST ZIP CODE	51-1234567-8		08/06/2019
	STATEMENT NUMBER	STATEMENT DATE	AMOUNT DUE
	666666666	07/10/2019	$57.81

YOUR MONTHLY ELECTRICITY USAGE

DAILY AVERAGES	Last Year	This Year
Temperature	76° F	73° F
Electricity kWh	0.0	16.8
Electricity Cost	$0.39	$2.57

QUESTIONS ABOUT YOUR BILL?

See our website: xcelenergy.com
Email us at: Customerservice@xcelenergy.com

Call Mon - Fri 7 a.m.-7 p.m. or Sat 9 a.m.-5 p.m.

Please Call: 1-800-895-4999
Hearing Impaired: 1-800-895-4949
Español: 1-800-687-8778

Or write us at: XCEL ENERGY
PO BOX 8
EAU CLAIRE WI 54702-0008

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SUMMARY OF CURRENT CHARGES (detailed charges begin on page 2)

Electricity Service	06/14/19 - 07/09/19	421 kWh	$64.36
Current Charges			**$64.36**

ACCOUNT BALANCE *(Balance de su cuenta)*

Previous Balance	As of 06/14		$563.95
Payment Received	Check 06/26		-$563.95 **CR**
	Check 06/18		-$6.55 **CR**
Balance Forward			**-$6.55 CR**
Current Charges			$64.36
Amount Due *(Cantidad a pagar)*			**$57.81**

028400 1/2

INFORMATION ABOUT YOUR BILL

Thank you for your payment.

Call *before* you move

If you're moving, remember to contact us in advance so we can stop your natural gas and electricity billing at your current address and start service, if needed, at your new one. Save yourself money and ensure a smooth transition to your new place. Please call or submit your changes at xcelenergy.com up to 45 days in advance.

RETURN BOTTOM PORTION WITH YOUR PAYMENT • **PLEASE DO NOT USE STAPLES, TAPE OR PAPER CLIPS**

Xcel Energy®

ACCOUNT NUMBER	DUE DATE	AMOUNT DUE	AMOUNT ENCLOSED
51-1234567-8	08/06/2019	$57.81	

Please see the back of this bill for more information regarding the late payment charge. Pay on or before the date due to avoid assessment of a late payment charge. Make your check payable to XCEL ENERGY

AUGUST						
S	M	T	W	T	F	S
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31

11

------ manifest line ---------

CUSTOMER NAME
STREET ADDRESS
CITY ST ZIP CODE

XCEL ENERGY
P.O. BOX 9477
MPLS MN 55484-9477

31 00000006436000000005781

Xcel Energy®

SERVICE ADDRESS	ACCOUNT NUMBER		DUE DATE
CUSTOMER NAME STREET ADDRESS CITY ST ZIP CODE	51-1234567-8		08/06/2019
	STATEMENT NUMBER	STATEMENT DATE	AMOUNT DUE
	666666666	07/10/2019	$57.81

SERVICE ADDRESS: STREET ADDRESS CITY ST ZIP CODE
NEXT READ DATE: 08/09/19

ELECTRICITY SERVICE DETAILS

PREMISES NUMBER: 300000000
INVOICE NUMBER: 0777777777

METER READING INFORMATION

METER 66666666 Read Dates: 06/14/19 - 06/14/19 (0 Days)

DESCRIPTION	CURRENT READING	PREVIOUS READING	USAGE
Total Energy	26175 Actual	26175 Estimate	0 kWh

METER READING INFORMATION

METER 999999999 Read Dates: 06/14/19 - 07/09/19 (25 Days)

DESCRIPTION	CURRENT READING	PREVIOUS READING	USAGE
Total Energy	421 Actual	0 Actual	421 kWh

ELECTRICITY CHARGES — RATE: Residential Service

DESCRIPTION	USAGE UNITS	RATE	CHARGE
Basic Service Chg			$6.67
Energy Charge Summer	421 kWh	$0.103010	$43.37
Fuel Cost Charge	421 kWh	$0.026318	$11.08
Decoupling Adj	421 kWh	- $0.001625	- $0.68 **CR**
Res Savers Switch AC			- $8.18 **CR**
Affordability Chrg			$0.81
Resource Adjustment			$3.02
Subtotal			**$56.09**
City Fees			$3.75
Transit Improvement Tax		0.50%	$0.30
County Tax		0.15%	$0.10
State Tax		6.875%	$4.12
Total			**$64.36**

INFORMATION ABOUT YOUR BILL

For an average residential customer, 51% of your bill refers to power plant costs, 11% to high voltage line costs and 38% to the cost of local wires connected to your home.

XCEL ENERGY

	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	TOTAL	NPV
Total Meters Replaced	*10,131*	*7,368*	*121,800*	*630,000*	*590,000*	*40,700*	*13,755*	*13,890*	*14,027*	*14,164*	*14,304*	*14,444*	*14,586*	*14,729*	*14,874*	*15,020*	*15,168*	***1,558,960***	
O&M ITEMS																			
Avoided O&M Meter Reading Costs																			
Drive-by Meter Reading Cost - O&M	2,155	86,393	1,085,789	2,460,063	3,740,671	3,587,859	4,153,792	4,287,938	4,426,475	4,562,493	4,702,691	4,847,197	4,996,143	5,149,667	5,307,907	5,471,011	5,639,126	**64,507,370**	**33,455,306**
TOTAL - Reduction in Meter Reading Costs	***2,155***	***86,393***	***1,085,789***	***2,460,063***	***3,740,671***	***3,587,859***	***4,153,792***	***4,287,938***	***4,426,475***	***4,562,493***	***4,702,691***	***4,847,197***	***4,996,143***	***5,149,667***	***5,307,907***	***5,471,011***	***5,639,126***	***64,507,370***	***33,455,306***
TOTAL O&M BENEFITS	**2,155**	**86,393**	**1,085,789**	**2,460,063**	**3,740,671**	**3,587,859**	**4,153,792**	**4,287,938**	**4,426,475**	**4,562,493**	**4,702,691**	**4,847,197**	**4,996,143**	**5,149,667**	**5,307,907**	**5,471,011**	**5,639,126**	64,507,370	33,455,306
OTHER BENEFITS																			
Cost reductions																			
Reduced Consumption on Inactive Meters	0	0	0	0	350,052	714,596	1,458,776	1,488,973	1,519,795	1,551,255	1,583,366	1,616,141	1,649,595	1,683,742	1,718,595	1,754,170	1,790,482	**18,879,538**	**9,235,364**
Reduced Uncollectible / Bad Debt Expense	0	0	0	0	259,816	538,078	1,114,360	1,153,920	1,194,884	1,237,303	1,281,227	1,326,711	1,373,809	1,422,579	1,473,081	1,525,375	1,579,526	**15,480,670**	**7,493,278**
Theft / Tamper Detection & Reduction	0	0	0	0	847,310	1,729,700	3,531,009	3,604,101	3,678,706	3,754,855	3,832,580	3,911,915	3,992,891	4,075,544	4,159,908	4,246,018	4,333,911	**45,698,446**	**22,354,455**
TOTAL - Cost Reductions	0	0	0	0	1,457,178	2,982,374	6,104,146	6,246,994	6,393,385	6,543,412	6,697,173	6,854,766	7,016,295	7,181,865	7,351,584	7,525,563	7,703,918	***80,058,654***	***39,083,097***
TOTAL OTHER BENEFITS	**0**	**0**	**0**	**0**	**1,457,178**	**2,982,374**	**6,104,146**	**6,246,994**	**6,393,385**	**6,543,412**	**6,697,173**	**6,854,766**	**7,016,295**	**7,181,865**	**7,351,584**	**7,525,563**	**7,703,918**	80,058,654	39,083,097
GRAND TOTAL BENEFITS	**2,155**	**86,393**	**1,085,789**	**2,460,063**	**5,197,849**	**6,570,233**	**10,257,938**	**10,534,932**	**10,819,860**	**11,105,905**	**11,399,864**	**11,701,963**	**12,012,439**	**12,331,532**	**12,659,491**	**12,996,574**	**13,343,044**	144,566,024	72,538,404