STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION

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September 2, 2020

In the Matter of Xcel Energy's Compliance with Annual Safety, Reliability, and Service Quality Metrics for 2019

Docket No. E002/M-20-406

REPLY COMMENTS OF FRESH ENERGY

Fresh Energy submits these Reply Comments in response to the Commission's August 18, 2020 *Amended Second Notice of Extended Comment Period* ("*Notice*") regarding locational reliability, equity, and service quality metrics for future reporting by Xcel Energy ("Xcel" or "the Company"). Below we address the questions posed by Commission staff in the Notice and recommendations made by other parties in *Initial Comments*.

1. **Please provide feedback on the staff proposal for locational reliability reporting (Attachment A).**
    a. **Whether the listed reporting requirements will allow for the development of a locational reliability metric**
    b. **Whether any additional information is needed**
    c. **How the information can best be presented to stakeholders and the public**

Fresh Energy appreciates staff's work developing this proposal for locational reliability reporting and believes this is a strong starting point for developing metrics that will improve Xcel's, the Commission's, and stakeholders' ability to identify reliability disparities and potential ameliorative actions.

Additional Information

Fresh Energy agrees with ELPC-VS that "a simplified 'scoring' system that benchmarks reliability on any particular feeder to the Company's systemwide reliability performance"[1] could be helpful for the public to understand how a feeder's performance compares with the system as a whole. For example, an aggregated score of the quartile of SAIDI, SAIFI, and CAIDI performance (normalized and with major event days) for each feeder, as compared to all feeders in Xcel Minnesota territory, could help users identify their area's relative reliability. Developing a refined scoring system may take additional time and stakeholder engagement, so Fresh Energy recommends that the Commission ask Xcel and stakeholders to continue

[1] ELPC-VS *Comments* filed August 19, 2020 in Docket E002/M-20-406 at p. 5

discussions about potential scoring methods and present a proposal for Commission consideration during the review of Xcel's 2020 Annual Electric Service Quality Report.

Similarly, we agree that a comparison of locational reliability performance over time will be key for helping Xcel, stakeholders and the public understand locational reliability trends,[2] identify problem areas, and evaluate the impact of interventions to improve location-specific reliability. Xcel currently includes the previous ten years of SAIDI, SAIFI, and CAIDI in annual reliability reports,[3] which provides a view of reliability trends by work center. We recommend that Xcel move toward a similar reporting for locational reliability over time. Fresh Energy recommends that Xcel move toward a five-year view of feeder level reliability, starting with a two-year view in the 2021 report and adding one year of data until achieving a five-year view in the 2024 report.

Presentation

The timing and method of presentation of this data is critical for ensuring its usefulness. Fresh Energy recommends that data provided under Parts 1 and 2 be provided in both PDF and live Excel spreadsheet format (with formulas intact). Fresh Energy supports Part 3 of the staff proposal for "a publicly available online map showing reliability by feeder that allows interested individuals to zoom in to a neighborhood level." We strongly recommend that the Commission set specific requirements for this map to ensure it provides value[4] and offer the following recommendations for map and data presentation.

The equity and locational reliability map should:

- Be updated regularly (at least annually) as part of the Service Quality Report;
- Not require creation of an account to view;
- Have layers for different data sets, including reliability performance and economic/ demographic data (see response to question 3 below), which viewers can select and de-select;
- Show lines for feeder locations, and indicate substation locations;
- Enable popup boxes that show viewers key equity and locational reliability data for any specific point on the map; and
- Enable the "attribute table" function to allow viewers to see and download underlying data for a specific view window.

As Xcel rolls out Advanced Metering Infrastructure (AMI), more detailed customer-level data will become available that can inform more granular locational reliability reporting. This can be valuable, for example, by enabling the reporting to identify small pockets of poor performance on an otherwise well-performing feeder. Fresh Energy recommends that the

[2] ELPC-VS *Comments* filed August 19, 2020 in Docket E002/M-20-406 at p. 5

[3] Xcel, *2019 Annual Service Quality Report* filed April 2, 2020 in Docket E002/M-20-406 at p. 9

[4] Fresh Energy has been closely following Xcel's development of a similar mapping tool as part of the Hosting Capacity Analysis. Over time, the HCA map has undergone several significant improvements at the Commission's direction. Fresh Energy's mapping recommendations above are based on lessons learned from the HCA proceeding and recent Commission direction in its July 31, 2020 *Order Accepting Report and Setting Further Requirements* in Docket E002/M-19-865.

Commission revisit the locational reliability reporting requirements in 2022 when Xcel will be mid-way through AMI implementation.

2. What are the appropriate pieces of data to collect to gauge locational customer service quality?

Fresh Energy supports the recommendations by Environmental Law and Policy Center and Vote Solar (ELPC-VS) to include the following data under Section 2 of the proposed reporting requirements, which would provide information on locational customer service quality:

- Involuntary disconnections (absolute number and as a percentage of customers)
- Customer accounts participating in energy assistance programs (absolute number and as a percentage of customers)
- Customer accounts participating in utility energy efficiency programs (absolute number and as a percentage of customers)

These data are readily accessible to Xcel and will provide insight into the geographic distribution of key electricity service and equity indicators.

3. What are the appropriate pieces of information to overlay with reliability and customer service quality data to gauge equity?

As noted by ELPC-VS and Suburban Rate Authority (SRA), presenting locational reliability and service quality information for more granular geographic areas is important for identifying potential variation among customers on a single feeder or in a single zip code. Fresh Energy agrees with ELPC-VS that Xcel should "provide locational reliability and service quality data by feeder AND census tract or zip code and provide that data as a downloadable .csv file."[5] Fresh Energy encourages Xcel to use census tract or ZIP +4 code to the greatest extent possible, since this will enable a better overlay with economic and demographic data sets. Accordingly, Fresh Energy recommends that Xcel include in the locational reliability web map:

- A layer showing median income by census tract and/or ZIP +4 code
- A layer showing percentage of race/ethnicity populations by census tract
- A layer showing percentage of households at or under the federal poverty level by census tract
- A layer showing housing characteristics (e.g., renter-occupied, age of housing units, etc.) by census tract

All of these data are publicly available from the 2010 Census Bureau and American Community Survey 5-year estimates data sets. The Commission could also consider existing geographic equity indicator sets, such as the Minneapolis Green Zone criteria,[6] to identify and establish other measures to overlay with reliability and customer service quality data as appropriate.

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[5] ELPC-VS *Comments* filed August 19, 2020 in Docket E002/M-20-406 at p. 6

[6] Minneapolis Population Characteristics and Environmental Indicators Map, *available at* http://www2.minneapolismn.gov/sustainability/policies/WCMSP-187876

Summary of Recommendations:

Fresh Energy recommends the Commission adopt the staff proposal for locational reliability reporting (Attachment A) with the following modifications, shown in red.

Modify Part 2 to read:

2. Xcel shall provide the following information as a downloadable .csv file, by feeder and census tract or zip code, for the calendar year:
    a. Reliability reporting region where the feeder is located
    b. The substation the feeder is on, with its full name
    c. The city or area in which the feeder is primarily located
    d. *The number of customers on the feeder, including the proportion of residential to commercial and industrial*
    e. *Whether the feeder is overhead or underground*
    f. SAIDI, SAIFI, and CAIDI, normalized (IEEE 1366 Standard) and with Major Event Days
        i. Compare current year SAIDI, SAIFI, and CAIDI to prior-year data starting in 2021, adding one year of prior reporting history until reaching a 5-year comparison in 2024.
    g. Number of outages, total customer outages, and total customer-minutes-out for the following situations:
        i. All levels, All Causes included
        ii. Bulk Power supply - All causes, distribution, substation, transmission substation, and transmission line levels
        iii. All levels, no "planned' cause, includes bulk power supply
        iv. All levels, "planned" cause only, includes bulk power supply
    h. Involuntary disconnections (absolute number and as a percentage of customers)
    i. Customer counts participating in energy assistance programs (absolute number and as a percentage of customers)
    j. Customer accounts participating in utility energy efficiency programs (absolute number and as a percentage of customers)

Modify Part 3 to read:

3. A publicly available online map showing reliability by feeder that allows interested individuals to zoom in to a neighborhood level, and if possible, the ability to have pop-ups that indicate reliability values, except to the extent that publicly disclosing this data would violate specific data privacy requirements or pose a significant security risk to Xcel's system or its customers. If Xcel withholds any information on this basis, Xcel shall provide the Commission with a full description and specific basis for withholding the information, including any Trade Secret claims. This map shall:
    a. Be updated at least annually as part of the Service Quality Report;
    b. Not require creation of an account to view or access;
    c. Have layers for different data sets, including reliability performance and economic/ demographic data which viewers can select and de-select;
    d. Show lines for feeder locations, and indicate substation locations;

e. Enable popup boxes that show viewers key equity and locational reliability data for any specific point on the map; and
f. Enable the "attribute table" function to allow viewers to see and download underlying data for a specific view window.

Fresh Energy also recommends that the Commission direct Xcel and stakeholders to continue discussions about a potential simplified locational reliability scoring method and present a proposal for Commission consideration during the review of Xcel's 2020 Annual Electric Service Quality Report.

We appreciate the opportunity to comment on this matter and thank the Commission for its consideration.

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